

Appendix A Detailed Responses to Submissions

1.1 Agency Submissions

The Applicant's response to the received agency submissions are outlined in **Table 1** below.

Table 1 Agency Submissions

Item	Issue Raised	Responses
City of Sydney		
COS-1	Thank you for the opportunity to comment on the amended Blackwattle Bay State significant rezoning and voluntary planning agreement. We note that the proposal by Infrastructure NSW (INSW) seeks to amend the recently made planning controls for NSW Government owned land at Blackwattle Bay to remove a 43% non-residential floor space minimum requirement.	Noted.
COS-2	The City supports the NSW Government's commitment to deliver additional housing stock on its surplus land as outlined below. This support however is conditional on implementing the following recommendations:	The support is noted. Responses to the following recommendations are provided below.
COS-3	Recommendation 1: Sydney LEP 2012 and the Blackwattle Bay Design Guidelines (the Design Guidelines) be amended to require a future Concept Development Application to be submitted and publicly exhibited to resolve a number of existing outstanding issues related to residential and public amenity and issues created by the proposed amendment, including:	<p>Section 4.23 of the EP&A Act prevents an environmental planning instrument (such as the Sydney LEP) from requiring the making of a Concept Development Application (Concept DA). Accordingly, any new provision within the Sydney LEP or Design Guidelines requiring a Concept DA would be inconsistent with the EP&A Act and have no effect. However, Section 4.23 of the EP&A Act does note that an LEP can require that a Development Control Plan is to be prepared for certain land, and that a Concept Application satisfies this requirement. Given the Blackwattle Bay Design Guidelines acts as a DCP, it is considered that a Concept DA is not necessary in this instance (though it is open to a future applicant to make such an application if they so elect).</p> <p>We also note that Clause 7.20 of the Sydney LEP specifically excludes the Blackwattle Bay site from a requirement to prepare a site-specific DCP or Concept DA.</p>

The site-specific provisions under the Sydney LEP and the application of the Blackwattle Bay Design Guidelines already establish an appropriate planning framework to allow the preparation of detailed Development Applications. The requirement for the preparation and approval of a Concept Development Application should not be mandated within legislation and a Concept DA should be subject to any future applicant's decision.

All development within the Blackwattle Bay Precinct with an estimated development cost (EDC) of more than \$10 million is State Significant Development under Schedule 2, Section 2 of *State Environmental Planning Policy (Planning Systems) 2021*. Pursuant to Section 2.10 of the Planning Systems SEPP, a requirement of an environmental planning instrument for a site-specific DCP does not apply to State Significant Development. Accordingly, a provision of the nature suggested by Council would not significantly effect development within the Blackwattle Bay Precinct.

Additionally, the existing Blackwattle Bay Design Guidelines are designed to guide development on the site in the same manner as a DCP. The Design Guidelines address the issues raised by Council throughout their submission, and it is noted that further detailed assessment of all issues affecting development will be undertaken during future DAs.

Notwithstanding the above, future applicants may wish to pursue a Concept DA once development is proposed at Area 17, however, this process should not be mandated. The process for future development is stepped out at **Table 3** of the Submissions Report.

COS-4

- apartment building envelopes and layouts that do not protect future residents from the harmful effects of noise from the western distributor and concrete batching plant while providing adequate natural ventilation to habitable rooms

Section 8.3 of the Design Guidelines sets out the requirements for managing and assessing noise as part of future Development Applications. A Precinct Noise Management Plan will be prepared by INSW prior to the lodgement of the first DA for residential or commercial uses. It will include any expected noise sources, the role as a mixed-use precinct, amenity noise goals, requirements of a Noise Impact Assessment and maps. Any future development will be required to prepare a Noise and Vibration Impact Assessment, that will be required to consider the Precinct Noise Management Plan, and justify any variations. There are a range of engineering solutions to manage noise and vibration impacts which can be managed during the detailed design phase.

		<p>Additionally, there will be locations within the existing building envelopes that will be not suitable for apartments due to existing environmental and amenity impacts, and therefore non-residential floorspace will be required in these locations. The proposed amendments are not seeking to require that all buildings be entirely residential.</p>
COS-5	<ul style="list-style-type: none"> insufficient natural cross ventilation in the first eight levels of residential buildings due to their large floor plates 	<p>There are currently no buildings designed in Area 17 for the City to assess in relation to natural ventilation. Assessment of natural ventilation will be undertaken at the time that a DA is submitted.</p> <p>The Design Guidelines include references to natural cross ventilation throughout Section 8 of the Design Guidelines, including for the consideration of the Apartment Design Guide (ADG) and ingenuity in design that addresses ventilation. Architectural design is required to have regard to natural ventilation at the DA stage in accordance with the requirements of the Housing SEPP and ADG.</p> <p>As identified in the Blackwattle Bay SSP and this SAPP, there are likely to be parts of the building envelopes where the amenity and environmental constraints restrict residential development (e.g. Western Distributor interface), and therefore commercial or other non-residential uses will likely be required to occupy these spaces. The existing planning provisions of the Act, Housing SEPP and Sydney LEP will continue to require non-residential uses in such locations, such that future buildings within the Blackwattle Bay Precinct will not be wholly residential.</p>
COS-6	<ul style="list-style-type: none"> unsafe and uncomfortable wind on footpaths and in public open spaces 	<p>There are currently no buildings designed in Area 17 for the City to be assessing in relation to wind impacts. An assessment of wind impacts will be undertaken at the time that a DA is submitted.</p> <p>A wind assessment was undertaken as part of the original State Significant Precinct rezoning process, which informed section 8.4 of the Design Guidelines. This section refers to wind and identifies that a quantitative wind effects report is to be submitted with any DA for the development of all new buildings. Therefore, there are numerous controls in place that will ensure the wind environment is considered.</p> <p>However, there are currently no building designs for the City to assess and therefore assessment of wind will be undertaken at the time that a DA is submitted.</p>

COS-7	<ul style="list-style-type: none"> unsafe intersections at Pyrmont Bridge Road and Banks Street for all users 	Section 5 of the Design Guidelines addresses transport, movement and parking. This matter is outside the scope of the amendments being considered by DPHI.
COS-8	Design Guidelines objectives and criteria are to be prepared in collaboration with the City, DPHI and the NSW Government Architect.	The Design Guidelines were approved as part of the extensive Blackwattle Bay SSP planning process and provide adequate guidance on the objectives and criteria of future development. The changes proposed to the Design Guidelines as part of this amendment are minor and do not substantially change the nature or content of the original Design Guidelines.
COS-9	Recommendation 2: The affordable housing contribution be increased from 7.5% of all floor space to a minimum of 12.9% of all floor space and the NSW Government to commit to the affordable housing being delivered on site.	There is no increase in the amount of floorspace being delivered as a result of the amendments, and therefore, the affordable housing contribution will remain consistent as previously approved, being 7.5% of the total floorspace provided as part of the development.
COS-10	Recommendation 3: The Pyrmont Bridge Road Cycleway Extension and the Bank and Miller Street Intersection Works be brought forward in the delivery program to service the new community.	This matter relates to the VPA which was exhibited between 12 December 2024 and 31 January 2025 (SVAP2024-33). This is not part of this application and these issues have been responded to separately.
COS-11	Recommendation 4: The NSW Government recommit to the return of Wentworth Park as public open space and to not extend the Greyhound Breeders, Owners and Trainers Association's lease beyond 2027.	Noted. This is outside the scope of the changes being proposed by INSW in respect of Area 17 at Blackwattle Bay.
COS-12	Recommendation 5: The Design Guidelines are to retain references to compliance with the City's Sydney Streets Design Code, public space plans and the requirement for a Flood Risk and Impact Assessment.	Noted. The exhibited SAPP proposed to remove matters related to street furniture and the Floor Risk and Impact Assessment in the Blackwattle Bay Design Guidelines. The amendments to the Design Guidelines will ensure that the public domain is generally consistent with the Sydney Streets Design Code with flexibility for Placemaking NSW and allow for future development to refer to the Flood Risk and Impact Study that has been prepared by INSW. Refer to COS-65 and COS-66.
COS-13	Recommendation 6: School Infrastructure NSW be required to prepare and publish publicly a public-school demand, supply access and opportunity study to 2041 for the Ultimo, Pyrmont, Glebe and Bays West areas.	Noted. This is outside the scope of the changes being proposed by INSW.
COS-14	Recommendation 7: The NSW Government is to continue improving bus, light rail and ferry services, and create an integrated network that can leverage off Pyrmont Metro in 2032.	Noted. This is outside the scope of the changes being proposed by INSW.
Land Use Mix		

COS-15	For Blackwattle Bay to function as a stand-alone office precinct, INSW's own economic, and employment advice was that a critical mass of office floor space was required. This critical mass was not achieved in the planning controls finalised by Department of Planning, Housing and Infrastructure in December 2022.	The support is noted. The SAPP does not propose to alter the approved building envelopes and therefore, the studies completed under the Blackwattle Bay State Significant Precinct (SSP) Study continue to be applicable.
COS-16	A shift to provide more housing at Blackwattle Bay aligns with the City's Ultimo Pyrmont Planning Proposal that seeks to:	Future development will be required to consider the planning frameworks currently in place regarding amenity and infrastructure. Future development will be required to consider the ADG, Sydney LEP, Sydney DCP (as so far as it applies) and any strategic plans. Likewise, any future developments proposed after the completion of buildings within Area 17 will be required to consider amenity and other impacts on the buildings within Area 17. Infrastructure works have been outlined in the exhibited Infrastructure and Contributions Review (dated June 2021, Attachment 22 of the exhibited SSD Rezoning documents). Additionally, a Social Infrastructure Assessment Addendum was prepared for the SAPP (dated March 2024, Appendix D of the exhibited SAPP) and concludes that the planned provision of social infrastructure is generally expected to meet the demand for the incoming residential and worker populations. The VPA provides over \$150 million of infrastructure with 3% local contributions applying at a DA stage.
COS-17	<ul style="list-style-type: none"> incentivise a critical mass of business floor space close to Pyrmont Metro Station to promote public transport use by workers and customers, support a self-sustaining workplace precinct in a diversity of building typologies while also continuing to support the growth and clustering of creative media businesses 	
COS-18	<ul style="list-style-type: none"> plan for a middle ring of mixed-use developments with strong public transport accessibility to provide homes for people and good access to local shops and services for existing and future residents, and 	
COS-19	<ul style="list-style-type: none"> provide an outer ring of residential development, comprised of housing options ranging from higher density to small lot dwellings, located slightly further from public transport but still within walking distance of light rail, bus routes or the Pyrmont metro station 	
COS-20	The City therefore supports INSW's proposal to deliver additional housing on the government owned site, however, additional amendments are required to the planning framework to protect the health and amenity of future residents, that overshadowing to neighbouring residential properties is minimised and that the proposed growing population is supported by appropriate infrastructure provision, in particular open space provision.	
Gross Floor Area		
COS-21	Residential gross floor area requires a greater building volume than commercial gross floor area. This is because unmeasured areas like terraces, services and circulation are greater in residential buildings than commercial buildings.	The building envelopes are not proposed to be altered and there are no proposed changes to the overall floorspace that can be achieved. Detailed bulk and massing matters will be addressed as part of future DAs.
COS-22	Removing the minimum proportion of commercial floor area, without adjusting the total permissible floor space, will result in an increase in the building massing and volume compared to the reference scheme. To avoid this, the total permissible floor space should be reduced to reflect the lesser efficiency of residential floor area.	The explanatory note on Page 92 of the Design Guidelines identifies that due to the maximum building envelopes on the sites and the environmental and amenity impacts, a new development may not fully occupy the maximum building envelope. Ultimately future development will only be able to provide floor space where it is achievable and does not impact the surrounding amenity or environment.

COS-23	<p>Clause 6.67(2) of Sydney LEP 2012 currently exempts the development at Blackwattle Bay from the requirement to prepare a Development Control Plan (or Concept Development Application). This is reasonable where a detailed Development Control Plan (or Design Guide) is in place that provides well considered planning controls that address the constraints presented on site. In absence of a revised reference scheme, floor area and Design Guidelines, Sydney LEP 2012 and the Design Guidelines should be amended to require a future Concept Development Application to resolve a number of existing outstanding issues related to residential and public amenity (see below).</p>	<p>The Design Guidelines are in place for Blackwattle Bay and will continue to apply. There is no requirement to revise the Design Guidelines as the SAPP only seeks to remove the minimum percentage of commercial floor space provided. The existing building envelopes will still apply and detailed assessment outlined within the Design Guidelines will still need to be undertaken as part of the future detailed DAs.</p> <p>With regard to the comments relating to the need for Concept DA, this should not be mandated and should be determined by future applicants. The Design Guidelines give effect to the objectives identified in the EP&A Act (Section 3.42), and can sufficiently guide future development, without the need for a development control plan.</p>
Residential and Public Amenity		
COS-24	<p>The reference scheme that informed the approved Design Guidelines failed to meet the following residential and public amenity standards:</p>	<p>This relates to the prior Blackwattle SSP process which was completed by DPHI. It is not necessary to revisit assessment issues that arose during the previously completed Blackwattle Bay SSP assessment process as these do not relate to this amendment. The building envelopes are not proposed to be amended as part of this rezoning application.</p>
COS-25	<ul style="list-style-type: none"> apartment building envelopes and layouts do not protect future residents from the harmful effects of noise from the western distributor and concrete batching plant while providing adequate natural ventilation to habitable rooms 	<p>Further detail and testing will be required as part of every future detailed DA or SSDA. Refer to Section 8.1 and Section 8.3 of the Design Guidelines.</p>
COS-26	<ul style="list-style-type: none"> insufficient natural cross ventilation in the first eight levels of residential buildings due to their large floor plates 	<p>Further detail and testing will be required as part of every future detailed DA or SSDA. Refer to Section 8 of the Design Guidelines.</p>
COS-27	<ul style="list-style-type: none"> prevention of unsafe and uncomfortable wind on footpaths and in public open spaces 	<p>Further detail and testing will be required as part of every future detailed DA or SSDA. Refer to Section 8.4 of the Design Guidelines.</p>
COS-28	<ul style="list-style-type: none"> safe intersections at Pyrmont Bridge Road and Banks Street for all users 	<p>Further detail and testing will be required as part of every future detailed DA or SSDA. Refer to Section 5 of the Design Guidelines.</p>
COS-29	<ul style="list-style-type: none"> overshadowing of the foreshore reserve, and 	<p>Further detail and testing will be required as part of every future detailed DA or SSDA. Refer to Section 8.1 of the Design Guidelines.</p> <p>It is also noted that the building envelopes are not proposed to be amended as part of this SAPP process, and therefore no new overshadowing is being considered at this point in time.</p>

COS-30	<ul style="list-style-type: none"> minimising overshadowing of neighbouring residential properties. 	<p>Further detail and testing will be required as part of every future detailed DA or SSDA. Refer to Section 8.1 of the Design Guidelines.</p> <p>It is also noted that the building envelopes are not proposed to be amended as part of this SAPP process, and therefore no new overshadowing is being considered at this point in time.</p>
COS-31	The additional bulk from a higher proportion of residential floor space, resulting from this proposed amendment, further exacerbates these issues.	There are no proposed changes to the building envelopes and the SAPP will not result in residential floorspace causing additional bulk. Further detail will be provided in future DAs or SSDAs.
COS-32	The City's alternative reference scheme demonstrated that the previously recommended mix could be accommodated with better amenity than the previous INSW reference scheme, with more floor area.	The City's alternative reference scheme demonstrates that an alternative scheme is possible. This same process will also be facilitated and achieved through the required competitive design processes and stage 2 DAs that are required to be completed in the next stage.
COS-33	The City is therefore confident that a scheme can be developed that provides more residential floor space and good amenity for future residents and the public, but that scheme would have a different street and open space layout and different building forms than that illustrated in the approved Design Guidelines.	There are existing building envelopes in place for Area 17 and no change is proposed to these envelopes as part of this SAPP process. It is not necessary to revisit assessment issues that arose during the previously completed Blackwattle Bay SSP assessment process as these do not relate to this amendment.
COS-34	If the amended rezoning proceeds without amending the Design Guidelines, the Design Guidelines will become a significant impediment to the project progressing at development application stage.	<p>The Design Guidelines are intended to provide guidance on the design outcomes of any future detailed DAs.</p> <p>As a result, the Submissions Report proposes a change to clause 6.68(2)(a) of the LEP so that future development is required to have 'considered' the Design Guidelines rather than being required to be 'consistent with'. See Section 3 of the Submissions Report.</p>
COS-35	Sydney LEP 2012 and the Design Guidelines must be amended to require a future Concept Development Application to be submitted and publicly exhibited to resolve the outstanding issues. The development controls relating to specific street layouts and building forms should be replaced with a series of objectives and criteria (e.g. references to the NSW Apartment Design Guide, Sydney Streets Code etc) which the future Concept Development Application must demonstrate consistency.	It is not proposed to amend the building envelopes and there are no further amendments to the Design Guidelines proposed. The preparation of the Design Guidelines relates to the prior Blackwattle SSP process which was completed by DPHI. It is not necessary to revisit assessment issues that arose during the previously completed Blackwattle Bay SSP assessment process as these do not relate to this amendment.
COS-36	The Design Guideline's objectives and criteria must be prepared in collaboration with the City, DPHI and the NSW Government Architect.	
Affordable and Diverse Housing		

COS-37	The redevelopment of Blackwattle Bay is a key opportunity to deliver significant affordable housing outcomes in the City of Sydney local area.	Noted. Future development will be required to deliver an affordable housing contribution of 7.5% of the total floorspace.
COS-38	The City welcomed the introduction of an affordable housing contribution requirement with the 2022 rezoning, however we remain concerned that the current 7.5% requirement is exceptionally low on a NSW Government owned site, given the housing crisis and the need for social and affordable housing. It falls far short of the expectation set out in the City's City Plan 2036: Local Strategic Planning Statement that 25% of floor space on NSW Government sites should be provided as affordable housing and/or social housing in perpetuity. This was the contribution requirement advocated in the City's submission to the Department about the proposed rezoning in 2022.	There is no increase in the overall amount of floorspace being delivered, therefore, the affordable housing contribution will remain consistent with 7.5% of the total floorspace, as per clause 6.70 of the Sydney LEP. Council's Affordable Housing Program still applies to the site as the rate that is used to calculate the affordable housing contribution payment is based on the 7.5% requirement. If changes to Council's Affordable Housing Program are gazetted, all future developments on the site will be required to comply with the amendments.
COS-39	The current contribution requirement, that is understood to be generally based on what can be contributed by the development for affordable housing while maintaining development feasibility, should be increased. The increase is justified given the proposed amendment will enable additional residential development on the site.	
COS-40	<i>Calculating the increase</i> A recent study undertaken in support of a proposal to amend the City of Sydney Affordable Housing Program, found that on privately owned sites, a 20% affordable housing contribution requirement on new residential floor space would not impact on development viability. The research is available here: https://city.sydney/ahc24 .	
COS-41	The proposed amendment seeks to remove the non-residential restriction on about 55,595 square metres of floor space. Given the findings of the City's study and noting a 7.5% contribution requirement applies to this floor space under the current controls, a further 12.5% of new residential floor space created by the proposed amendment (about 6,949 square metres) should be required.	There is no increase in the overall amount of floorspace being delivered, therefore, the affordable housing contribution will remain consistent with 7.5% of the total floorspace, as per clause 6.70 of the Sydney LEP.
COS-42	Under current planning controls the contribution requirement of 7.5% of all floor space on the site is expected to deliver about 9,697 square metres of affordable housing. Should a further 6,949 square metres be required to be delivered (about 16,650 square metres in total), the current Sydney LEP 2012 contribution requirement, that applies to all floor space delivered on the site, will need to increase from 7.5% to 12.9%. This will deliver about 210 affordable dwellings at 80 square metres each. <i>Note the total contribution requirement on the "new" residential floor space will be 20%, including the existing contribution requirement of 7.5% of floor space, plus an additional 12.5% contribution requirement on new residential floor space. The 20% affordable housing contribution requirement is informed by the City's study that has demonstrated the contribution requirement is feasible.</i>	The removal of non-residential mix does not result in only residential floor space being delivered at Area 17. The applicability of a further 12.5% contribution on new residential floor space assumes that the entire development will be residential which is not the case, given the constraints relating to amenity and environmental impact. Additionally, there are only proposed changes to the land use mix, not the floorspace. Clause 7.13 of the Sydney LEP outlines that the affordable housing levy contribution for affordable housing for City of Sydney is generally 3% of the total floor area of the development that is intended to be used for residential purposes. Therefore, the provision of 7.5% of the total floor area of the building (Clause 6.70 of the Sydney LEP), regardless of land usage, is already significantly greater than 3%.

It is noted that Council's Affordable Housing Program relevant contribution rates will still apply to the site. If changes to Council's Affordable Housing Program are gazetted, all future developments on the site will be required to comply with the amendments, meaning they will be required to pay a higher contribution rate.

COS-43	The NSW Government should commit to the affordable housing being delivered onsite to a minimum and 12.9%, if not 25% of all floor space.	There is no intention of increasing the amount of affordable housing required to be paid on the site. There is no increase in the overall amount of floorspace being delivered, therefore, the affordable housing contribution will remain consistent with 7.5% of the total floorspace, as per clause 6.70 of the Sydney LEP.
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Local Infrastructure Contributions

COS-44	The Explanation of Intended Effect states that no changes are proposed to the infrastructure contribution arrangements that were established in the 2022 rezoning of the Precinct. This included a commitment for future development to pay local infrastructure contributions to the City of Sydney Council, to be put towards the provision of public amenities or public services.	These matters relate to the VPA which was exhibited between 12 December 2024 and 31 January 2025 (SVPA2024-33). This is not part of this application, and these issues have been responded to separately.
COS-45	Both the 2022 Finalisation report and the current Explanation of Intended Effect are ambiguous in relation to whether the costs of providing specific infrastructure on the Government owned land are to be offset against local contributions (the effect of which would be to reduce local contributions received by the City). It is the City's understanding that this is not the intention. It is understood that the intention is for contributions not to be payable on these infrastructure items themselves, with the cost of their delivery being borne by the developer but not being included in development costs for contribution purposes. Contributions would be payable on other development in the Precinct.	
COS-46	The City is satisfied that the draft Voluntary Planning Agreement (draft VPA) addresses this ambiguity in Schedule 5. Local infrastructure contributions are described as monetary contributions towards the provision of local infrastructure payable in relation to each "Relevant Development". The draft VPA defines "Relevant Development" as <i>"a part of the Development in the Development Area for which Development Consent is granted or a Complying Development Certificate is issued for residential or commercial purposes or uses, excluding any such Development Consent or Complying Development Certificate for any part of the Works Contribution"</i> . This definition ensures that local contributions will be payable for residential and commercial development on the site, but not for the infrastructure specified in the "Works Contribution" table in Schedule 6 of the draft VPA.	

COS-47	The City supports the draft VPA's arrangements for local infrastructure contributions to be payable at 3% of the development cost in the event that the City does not have a s7.12 contributions plan in force. The City notes that in these instances, a developer is to submit a Quantity Surveyor's cost estimate to the Minister, who is then to notify the developer in writing of the accepted cost estimate. Notification of the accepted cost estimate including the monetary amount of contribution payable, should also be provided to the City, so that the City can update its records and know the contributions amount it should expect to receive.
COS-48	The City notes that work is still progressing on a s7.12 plan to facilitate local infrastructure contributions, with the Draft Ultimo Pyrmont Local Infrastructure Contributions Plan 2023 having been on public exhibition in October - November 2024.
COS-49	The draft VPA contains timing provisions for Works Contributions (Schedule 6 Item 1) and Land Contributions (Schedule 7 Item 1) linked to the issue an Occupation Certificate which is an appropriate trigger. However, the Occupation Certificate is described as one that will result in a threshold amount or percentage of the total GFA. The City notes that the use of this threshold formula may be cumbersome to administer and difficult to enforce where multiple buildings are under construction concurrently.
COS-50	<i>Essential active transport connections</i> It is noted that the VPA delays the delivery of essential works contributions within Schedule 6 - Development Contribution (Works Contribution), that enhance or complete essential active transport connections for the precinct. It is recommended to bring several key items forward to provide for the new community.
COS-51	<ul style="list-style-type: none"> Item 6 - Pyrmont Bridge Road Cycleway Extension Works Contribution. Reason: To provide safety and connectivity for cyclists from within the precinct and the wider region to access the City's cycle network
COS-52	<ul style="list-style-type: none"> Item 10 - Bank and Miller Street Intersection Works Contribution. Reason: To provide safety and connectivity for cyclists and pedestrians from within the precinct exiting Park Street, and the wider region to access the City's cycle network. The vehicular egress for the Hymix plant can be reconfigured during development to facilitate continuous access.
COS-53	If not possible to bring the following forward for delivery with the first OC, the following items should have their design and consultation with the City of Sydney and other relevant stakeholders completed before the issue of the first Occupation Certificate for Development within the Development Area, to ensure consistency with other elements delivered within the precinct.

COS-54	<ul style="list-style-type: none"> Item 1 - Bank Street Cycleway Works Contribution. Reason: To ensure that traffic committee approval is provided for lane closures in Bank Street and any further conflicts arising from the precinct development are identified and addressed. 	
Open Space Infrastructure		
COS-55	Wentworth Park sits in the middle of one of the most densely populated neighbourhoods in Australia. It is already a highly utilised area of public open space:	Noted. Matters raised in regard to open space infrastructure provision are beyond the scope of this SAPP.
COS-56	<ul style="list-style-type: none"> Monday to Thursday the City's sporting fields at Wentworth Park are fully booked between 3pm and 10pm, with additional unmet demand for an additional 4 fields 	
COS-57	<ul style="list-style-type: none"> Weekends are generally booked out between 8.00am-5.00pm 	
COS-58	<ul style="list-style-type: none"> the City's fields are used in excess of 40 hours per week, not including casual use, and 	
COS-59	<ul style="list-style-type: none"> in summer 4,000 OzTag players utilise the City's fields, including 1,500 women. 	
COS-60	The City's Local Housing Strategy aims to provide an additional 56,000 dwellings between 2016 and 2036, with over 30,000 dwellings built or in the pipeline, including in areas around Wentworth Park such as Blackwattle Bay.	
COS-61	The City welcomed the former Government's commitment to return Wentworth Park under the Pyrmont Peninsula Place Strategy. It is critical that this parkland is returned to support the additional residential and commercial uses planned in the area.	
COS-62	The City has already conducted early consultation and begun a new masterplan for parkland use of this prime inner-city land, and we have included an allowance for embellishment works for the parkland in our Draft Ultimo Pyrmont Local Infrastructure Contributions Plan 2023.	
COS-63	As part of the City's consultation, we heard the community overwhelmingly supports removing the greyhound racing track to create more public parkland. The early engagement also told us the community wants a well designed park to connect to nature, exercise and play, and one that supports social activity and a place that is easy to move through, which the greyhound track entirely prevents. This demand will only become stronger with population growth resulting from redevelopment of Blackwattle Bay, Bays West and Pyrmont.	
COS-64	The NSW Government must recommit to the return of Wentworth Park as public open space and to not extend the Greyhound Breeders, Owners and Trainers Association's lease beyond 2027. To not do so would potentially jeopardise the delivery of much needed housing in Ultimo, Pyrmont and the Bays.	

Design Guidelines Amendments

COS-65	It is noted that on page 36 of the edited guidelines that the following sentence is removed: Street furniture is to be consistent with the Sydney Streets Design Code and relevant Council public space plans. If ownership or maintenance of the public areas and associated structure are to be ever to be taken over by the City, then these areas and structures must comply with the City's Codes and plans. This includes Smartpoles and park lighting. It is also important that new streets, linked to our surrounding network of streets do read consistently, and they should have the same furniture as the City for this reason.	As per the amended Design Guidelines, Section 3.5.2(3) notes that the public domain and street furniture should have consideration for the Sydney Streets Design Code. This will ensure that public domain is generally consistent with the Sydney Streets Design Code, however, will enable flexibility in the delivery of the streetscape.
COS-66	On page 49 of the edited guidelines, we note Item 1 has been removed. We note also other retained text refers to the deleted Item 1. Item 1 is critical to be retained. This document refers to lands that are critical floodplain overland flow paths for upstream development. By deleting this text, the development is not adequately considering the impacts of flooding to upstream properties and the safety of the public surrounding the development. All developments are required to complete these studies in such situations, and it would not be appropriate for a NSW Government Agency to not follow its own NSW Flood Prone Land Policy.	As per the amended Design Guidelines, Section 4.6 relates to flooding. A Flood Study has been prepared by INSW and it has been reviewed twice and endorsed by Conservation Programs, Heritage and Regulation. The Flood Study has also been provided to DPHI. Future development applications should be prepared in accordance with the Flood Study prepared.

School Infrastructure

COS-67	The City's Ultimo, Pyrmont and Glebe communities have consistently, over a number of years, highlighted their concerns around public school capacity and access in the area. These concerns have only intensified with the NSW Government's publication of place strategies for Bays West and Ultimo Pyrmont which outline significant population increases to 2041, but no provision or plan for augmented or additional public school infrastructure.	Noted. This matter is beyond the scope of this SAPP.
COS-68	School Infrastructure NSW must be required to prepare and publish publicly a public-school demand, supply access and opportunity study to 2041 for the Ultimo, Pyrmont, Glebe and Bays West areas.	

Public Transport Infrastructure

COS-69	The City supports the Ultimo and Pyrmont communities' request for additional and augmented public transport services in the area. There is and will be growing demand for additional light rail, bus and ferry services, that run more frequently and stop more often, such as the F10 ferry stop at Pirrama Park. The City acknowledges that in the long-term, Pyrmont Metro will offer greatly improved connections with the city centre and other places on the Metro. However, there is still a need to provide additional and augmented services, including on the L1 light rail noting the operator's investigations into ways to achieve this. Additional services will support the NSW Government's redevelopments at Blackwattle Bay and the new fish markets, as well increase mobility	Noted. This matter is beyond the scope of this SAPP.
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for an existing community in an area where walkability is impacted by steep topography and busy State roads. Connections to places such as Broadway Shopping Centre are important.

Department of Climate Change, Energy, the Environment and Water (Conservation Programs, Heritage and Regulation (CPHR) Group)

CPHR-1	CPHR has reviewed Explanation of Intended Effect (December 2024), Amendment to Area 17 Land Use Mix (Ethos Urban, 19 June 2024), Proposed Design Guidelines (provisionally dated 2024), and Flood Risk and Impact Assessment (FIRA) (Mott MacDonald, October 2023) and provides detailed flood advice at Attachment A. In summary, CPHR recommends that the following be considered:	Noted. Responses to the recommendations are provided below.
CPHR-2	<ul style="list-style-type: none"> Local Planning Direction 4.1 Flooding 	
CPHR-3	<ul style="list-style-type: none"> the change in flood risk 	
CPHR-4	<ul style="list-style-type: none"> emergency management issues 	
CPHR-5	<ul style="list-style-type: none"> the design guidelines are updated with further amendments. 	
CPHR-6	CPHR notes that the NSW State Emergency Service (SES) was not consulted on the State Significant Precinct rezoning for the Sydney Fish Market site, that was approved in December 2022. The consideration of emergency management issues is therefore a key consideration at this stage.	Noted.

Background

CPHR-7	CPHR considered the NSW Flood Risk Management Manual (the manual) and supporting guides, and the Local Planning Direction for flooding in preparation of the comments below.	Noted.
CPHR-8	CPHR notes that the NSW SES were not consulted on the State Significant Precinct rezoning for the Sydney Fish Market site, that was approved in December 2022. The consideration of emergency management issues is therefore a key consideration at this stage.	Noted. Future development will be required to consider emergency management throughout the required development application process.

Flood Risk Management – Summary

CPHR-9	The site is currently zoned MU1 Mixed Use. Non-residential uses are currently required to be at least 43% of the total floor area. The proposal seeks to remove this requirement for non-residential uses to enable the delivery of additional dwellings. This would significantly increase the intensity of residential development on flood prone land. Residential development presents a higher flood risk profile than commercial	Flood impacts were considered during the rezoning undertaken in 2022, and a precinct-wide Flood Study has subsequently been completed and endorsed by the (former) Environment and Heritage Group. The proposed amendment does not trigger re-assessment of these issues.
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development. It is noted that sensitive uses were previously precluded from the precinct.

Local Planning Direction

CPHR-10	Acknowledging that state-led rezoning is not obliged to do so, CPHR recommends that consistency with the Local Planning Direction 4.1 for Flooding (Local Planning Direction) is considered. CPHR recommends that reporting should refer to the Local Planning Direction and address how the proposal satisfies its provisions. In particular, the consent authority should be satisfied that the objectives are met. Further details are provided in the following sections. In summary, CPHR recommends the proposal should:	Flood impacts were considered during the rezoning undertaken in 2022, and a precinct-wide Flood Study has subsequently been completed and endorsed by the (former) Environment and Heritage Group. The proposed amendment does not trigger re-assessment of these issues. Additionally, the Flood Study and Flood Risk and Impact Assessment have been provided to DPHI. Future development will be required to consider flood risk and flood emergency management, including evacuation.
CPHR-11	1. Meet the objectives of the Local Planning Direction, including:	
CPHR-12	(a) ensure consistency with the <i>NSW Government's Flood Prone Land Policy</i> and the principles of the <i>Floodplain Development Manual 2005</i> *. * Noting that although the <i>Floodplain Development Manual 2005</i> has been replaced by the <i>Flood Risk Management Manual 2023</i> , there is consistency between the 2005 and the 2023 manuals and that their intent and principles fundamentally remain the same.	
CPHR-13	(b) ensure that the provisions of an LEP that apply to flood prone land are commensurate with flood behaviour and includes consideration of the potential flood impacts both on and off the subject land.	
CPHR-14	2. Demonstrate consistency with the Local Planning Direction clauses, particularly clause 3.	
CPHR-15	Reporting should refer to clause 3 and address how the proposal satisfies its provisions.	

Flood Risk

CPHR-16	In consideration of the increased flood risk associated with residential development, CPHR recommends the following should be considered as mitigation measures:	Noted.
CPHR-17	<ul style="list-style-type: none"> Commercial or non-sensitive community uses on the ground floor where there is significant flooding. This may include buildings with flooding of greater than H1 hazard in the Probable Maximum Flood (PMF), of which there are three. In particular, the southernmost building fronting Pyrmont Bridge Road (Building 05B) is subject to H4 hazard in the PMF. 	There are no proposed amendments to the building envelopes, nor has any built form design been undertaken at this stage. Future development will be required to consider flood risk and flood emergency management and appropriate mitigation measures will be in place to mitigate the flood risk at the site in relation to the design of the buildings.
CPHR-18	<ul style="list-style-type: none"> Raising residential floor levels above the PMF level due to the short warning time available and therefore potential evacuation difficulties. 	

Therefore, the flood impacts considered during the rezoning undertaken in 2022, and the precinct-wide Flood Study completed and endorsed by the (former) Environment and Heritage Group remain relevant and no further assessment is considered required this stage.

Emergency Management

CPHR-19	CPHR recommends that the proposal should consider the Flood Risk Management Guideline EM01 Support for Emergency Management Planning and the Shelter-in-Place guideline for flash flooding. The NSW SES should be consulted. The decision-making process per Figures 20 and 21 of Guideline EM01 should be considered.	There are no proposed amendments to the building envelopes, nor has any built form design been undertaken at this stage.
CPHR-20	CPHR does not recommend basement car parks where shelter in place is proposed.	<p>Future development will be required to consider flood risk and flood emergency management and appropriate mitigation measures will be in place to mitigate the flood risk at the site.</p> <p>Therefore, the flood impacts considered during the rezoning undertaken in 2022, and the precinct-wide Flood Study completed and endorsed by the (former) Environment and Heritage Group remain relevant and no further assessment is considered required this stage.</p>

Design Guidelines

CPHR-21	CPHR recommends that amendments are made to the proposed Design Guidelines, provisionally dated 2024. CPHR notes that the recommended Flood Planning Level (FPL) for the precinct includes an allowance for climate change on top of the 1% Annual Exceedance Probability flood level plus freeboard per Section 5.2 of the FIRA. It may be beneficial to define the FPL in Section 4.6 of the Design Guidelines or refer to Section 5.2 of the FIRA. The following amendments are recommended:	There are no proposed amendments to the building envelopes, nor has any built form design been undertaken at this stage.
CPHR-22	<ul style="list-style-type: none"> 4.6.1a: Replace “required in 1 above” with “by Mott Macdonald dated October 2023”. 	Future development will be required to consider flood risk and flood emergency management and appropriate mitigation measures will be in place to mitigate the flood risk at the site. Additionally, any future development will be required to address and assess the relevant flood planning level through the development application process.
CPHR-23	<ul style="list-style-type: none"> 4.6.1d: Refer to 1b. 	
CPHR-24	<ul style="list-style-type: none"> Insert new point after 4.6.1d: Where a shelter in place strategy is required, floor levels for residential development are to be located above the PMF level, as well as the FPL. 	Therefore, the flood impacts considered during the rezoning undertaken in 2022, and the precinct-wide Flood Study completed and endorsed by the (former) Environment and Heritage Group remain relevant and no further assessment is considered required this stage.
CPHR-25	<ul style="list-style-type: none"> 4.6.1e: Replace “the 1% AEP flood level + 0.5 m” with “the FPL”. 	
CPHR-26	<ul style="list-style-type: none"> 4.6.3: Insert after “NSW Flood Risk Management Manual 2023” “and supporting guidelines”. 	
CPHR-27	<ul style="list-style-type: none"> 4.6.3: Replace “flood study” with “Flood Impact and Risk Assessment”. 	

CPHR-28	<ul style="list-style-type: none"> 4.6.3c: Replace “required in 1 above” with “by Mott Macdonald dated October 2023”. 	
CPHR-29	<p>CPHR further recommends that the active street frontages on Figure 36 are reconsidered considering the proposed changes and flood behaviour. It is recommended that the loading dock entry for Building 05B is located away from deeper floodwater and instead at the east of the building. While it is not unreasonable to locate back of house facilities along the Pyrmont Bridge Road frontage, floor levels here should not be at street level or below due the flood depths. Rather, entries should be to the east (off Park Lane), with an impermeable frontage to Pyrmont Bridge Road.</p>	<p>Flood impacts were considered during the rezoning undertaken in 2022, and a precinct-wide Flood Study has subsequently been completed and endorsed by the (former) Environment and Heritage Group. The proposed amendment does not trigger re-assessment of these issues.</p> <p>There are no proposed amendments to the building envelopes, nor has any design of built form been undertaken or is proposed at this stage.</p> <p>Future development will be required to consider flood risk and flood emergency management and appropriate mitigation measures will be in place to mitigate the flood risk at the site.</p>
Transport for NSW		
TfNSW-1	Transport for NSW (TfNSW) appreciates the opportunity to provide comments on the above State assessed Rezoning Proposal (the proposal) which was on public exhibition between 12 December 2024 and 30 January 2025.	Noted.
TfNSW-2	The proposal seeks to remove the requirement for Area 17 to have a minimum 43% non-residential use by deleting clause 6.68(2)(c)(v) of the <i>Sydney Local Environmental Plan 2012</i> . There are no other changes proposed to building height, gross floor area, land zones, built form, maps or other planning controls approved as part of the rezoning of the precinct in December 2022.	Noted.
TfNSW-3	The proposal assumes a land use mix of 70% residential use and 30% non-residential use within Area 17, compared to 57% residential use and 43% non-residential respectively under the current controls. The proposed planning controls are anticipated to enable the delivery of approximately 320 additional dwellings in Area 17 in the precinct, increasing the number of new dwellings to 1,523 within the wider precinct, but reducing the overall jobs population by up to 1,372 people.	Noted.
TfNSW-4	TfNSW supports the intent of the proposal to increase housing supply in the precinct, and notes that it would have negligible traffic impact on the surrounding road network.	The support is noted.
TfNSW-5	TfNSW notes that Blackwattle Bay Precinct (Infrastructure NSW) State Voluntary Planning Agreement (VPA) was also exhibited with the rezoning proposal. Transport has been working with INSW who are progressing some of the items such as the Bank St Park, land swap and over water foreshore boardwalk. Transport will continue to work with INSW to enable delivery of the transport items in the State VPA.	Noted. The VPA does not form part of this scope.

TfNSW-6	Detailed comments are provided in Attachment A for the Department of Planning, Housing and Infrastructure's consideration.	Noted. Addressed in TfNSW-7 and TfNSW-8.
TfNSW-7	<p>The report does not assess the implications on public transport with the revised number of dwellings and reduced jobs population. Statement on page 3 is too broad "multi-modal transport network which prioritises walking and cycling for shorter trips and metro, light rail and bus for longer trips will support the aspirational sustainable mode share target."</p> <p>Traffic and Transport Assessment, prepared by AECOM dated 5 June 2024, page 3</p>	<p>Future developments will be required to address public transport and sustainable transport. Transport Impact Assessments prepared for future DAs will be required to address transport connections. The proposed development will have access to the Pyrmont Metro Station which is expected to complete construction in December 2028.</p> <p>However, the scope of this SAPP is related to land use mix and does not address the transport connections to and from Area 17.</p>
TfNSW-8	<p>The report could reassess and prioritise the identified walking, cycling, public transport, and parking initiatives/action from the earlier Blackwattle Bay TMAP and confirm what items are critical to supporting the potential increase in dwellings and promote sustainable transport trips instead of private vehicle use.</p> <p>Specifically, the links in and out of the precinct to the Pyrmont Metro Station and other public transport services (light rail) should be considered a high priority and ensure residents living in Blackwattle Bay have access to a high-quality and grade separated active transport network.</p> <p>Traffic and Transport Assessment, prepared by AECOM dated 5 June 2024, General</p>	Public transport connections and parking initiatives will be considered during the detailed DAs of future development. This includes through Traffic Impact Assessments and the preparation and implementation of sustainable transport in Green Travel Plans.
Sydney Water		
SW-1	Thank you for notifying Sydney Water of the Blackwattle Bay Area 17 (Sydney Fish Market site) planning proposal which seeks the removal of clause 6.68(2)(c)(v) in the Sydney Local Environmental Plan 2012 which requires a minimum amount of non-residential floor area to be included in future development of Area 17 in the Blackwattle Bay Precinct. This proposal will facilitate the delivery of approximately 320 additional dwellings in the Precinct.	Noted.
SW-2	The Blackwattle Bay State Significant Precinct was rezoned in December 2022. The SSP will deliver approximately 97,500m ² of residential GFA allowing for approximately 1,200 apartments, and approximately 100,000m ² of commercial and retail GFA allowing for approximately 5,600 new jobs.	Noted.
SW-3	The Area 17 proposal will increase the dwellings to be delivered within the SSP to approximately 1,500 dwellings and decrease the jobs delivered to approximately 4,200 jobs.	Noted.
SW-4	We have reviewed the application based on the information supplied and provide the following comments for your information to assist in understanding the servicing needs of the proposed development.	Noted.

Water Servicing		
SW-5	The development is located within Pyrmont Gravity Water Supply Zone.	Noted.
SW-6	Based on the estimated flow requirements, the current system does not have capacity to service the development and will require network amplifications and extensions.	Noted. Future DAs will be required to address this and perform the required network amplifications and extensions.
SW-7	Detailed requirements will be provided at the Section 73 application stage.	Noted. Future DAs will be subject to detailed requirements at the Section 73 application stage.
Wastewater servicing		
SW-8	The development is located within the Bondi wastewater system.	Noted.
SW-9	Based on the estimated flow requirements, the network has capacity to service the proposed development.	Noted.
SW-10	Amplifications, adjustments, deviations and/or minor extensions may be required.	Noted. This matter will be considered during future DAs.
SW-11	Detailed requirements will be provided at the Section 73 application stage.	Noted. Future DAs will be subject to detailed requirements at the Section 73 application stage.
Trade wastewater requirement		
SW-12	If this proposed development is anticipated to generate trade wastewater, the developer must submit an application requesting permission to discharge trade wastewater to Sydney Water's wastewater system. Applicant must wait for approval and issue of a permit before any business activities can commence.	Noted. This matter will be considered during future DAs.
SW-13	The permit application can be made on Sydney Water's web page through Sydney Water Tap In. http://www.sydneywater.com.au/tapin/index.htm	Noted.
Protection of Assets		
SW-14	This letter constitutes high-level initial advice only. Further advice from Sydney Water may be offered during the exhibition, the feasibility or, Section 73 stages with regards to the protection of our existing and proposed assets/easements and any requirements pertaining to building over or adjacent to Sydney Water assets. These aspects will be investigated as we receive more detail, and specific protection requirements, objections or amendments will be documented as they progress.	Noted.
Next Steps		

SW-15	Infrastructure NSW should complete and return the enclosed Growth Data Form including the revised 1,500 dwelling staging plans to the Sydney Water Growth Analytics team via the email address below. The Growth Data Form should be updated promptly with Sydney Water in case of changes.	Noted. The Growth Data Form has been completed and returned to Sydney Water by INSW.
SW-16	It is recommended that the developer either registers an Anticipated Section 73 case with Sydney Water in tandem with their Development Application or registers minor extension cases, to give more time to address the network amplifications and extension requirements pre-DA approval.	Noted. This matter will be considered during future DAs.
SW-17	The development servicing advice provided is not formal approval of our servicing requirements and is based on the best available information at the time of referral (e.g. planning proposal). It is important to note that this information can evolve over time in tandem with the progression of other development projects in the catchment, changes within the local systems and receiving works. This is particularly important in systems with limited capacity. Furthermore, Sydney Water does not reserve or hold capacity for proposed developments, regardless of whether the area has been rezoned or not. To ensure accuracy and alignment with current conditions, it is best to approach Sydney Water for an updated capacity assessment particularly if a referral response letter is more than 12 months old.	Noted. This matter will be considered during future DAs.

1.2 Organisations and Public Submissions

The Applicant's response to the received organisation and public submissions are outlined in **Table 2** below.

Table 2 Organisation and Public Submissions

Item	Issue Raised	Responses
City West Housing		
CWH-1	The rezoning proposal seeks to amend a clause in the Sydney Local Environmental Plan 2012 that requires a minimum amount of non-residential floor space to be included in any future development, thereby creating a planning framework that supports the delivery of an additional ~320 new homes.	Noted.
CWH-2	City West Housing, an affordable housing provider, is the owner and operator of significant landholdings in the area. Our Head Office is also currently located close by in Saunders Street Pyrmont. We have been delivering affordable rental housing in Pyrmont for 30 years, contributing to diverse communities and the productivity of the City by ensuring that low income households can live and work locally.	Noted.
CWH-3	City West Housing welcomes the proposed change to the land use controls on the Sydney fish market site, and the opportunity for the NSW Government through its preferred delivery partner, to deliver more residential housing.	The support is noted.
CWH-4	City West Housing notes that (in 2016) 24% of households living in Pyrmont were earners in the top income bracket and that it is envisaged that the majority of households who may choose to live in this precinct will be upper middle income earners.	Noted.
CWH-5	With the demand for affordable housing in the inner city in well located homes close to transport and amenities growing exponentially, it will be important to retain the requirement for this development to contribute to affordable rental housing in the City of Sydney.	There is no increase in the overall amount of floorspace being delivered, therefore, the affordable housing contribution will remain consistent with 7.5% of the total floorspace, as per clause 6.70 of the Sydney LEP. This contribution will be provided by either dedication of completed dwellings or a monetary contribution paid to Council.
CWH-6	The Government has committed to exploring delivery of affordable residential housing in addition to market housing, either through a cash contribution or dedication of completed apartments equal to 7.5% of total floor space in the precinct.	It is noted that Council's Affordable Housing Program still applies to the site in addition to the 7.5% required to be delivered on site. If changes to Council's Affordable Housing Program are gazetted, all future developments on the site will be required to pay further contributions and rates proposed under the program.
CWH-7	City West Housing understands that delivering a component of affordable housing on site may be attractive to Government. The community housing sector's experience however is that without careful design, ideally through the provision of a separate	Noted. The Applicant has not determined if the housing contribution will be made in dedication of dwellings or a monetary contribution. Detailed design of the affordable housing provision will be at a later date.

building (or stratum) for affordable housing, the impact of strata fees on the operating costs of non profit housing providers who are subsidising rents for apartments in mixed tenure complexes can be prohibitive.

CWH-8	City West Housing would encourage the NSW Government to provide any contribution to affordable housing through a cash contribution for use in the Local Government Area. Providing cash is also likely to have a multiplier effect, allowing more affordable housing to be delivered by one of the City of Sydney's Recommended (Community Housing) Providers than the alternative.	Noted. The housing contribution will be made in dedication of dwellings or a monetary contribution. Detailed design of the affordable housing provision will be at a later date.
CWH-9	As the owner and operator of a number of affordable apartment buildings in the vicinity, including an apartment building on Wattle Street across the road from the existing fish markets site, City West Housing also looks forward to more detailed consultation in due course to understand how this development may impact our existing residents as this project progresses.	Noted.

Public Submissions		Response
Concerns for Community Amenity		
P1	<ul style="list-style-type: none"> Concern that the inclusion of homes on the site of Blackwattle Bay will negatively impact the amenity of the community. 	Residential uses have always been intended to be provided at Area 17. The SAPP only proposes to alter the land use mix of residential and non-residential floor space provided at the site. The Design Guidelines and further detailed design required for DAs will ensure that amenity impacts are minimised and that overall the site improves amenity for surrounding residences and buildings.
P2	<ul style="list-style-type: none"> Concern that quality of life will be worsened due to overcrowding impacts created by the new development relating to access to social infrastructure and open spaces. 	<p>Public infrastructure works will be carried out and delivered to ensure that housing provided at Area 17 (and the broader Blackwattle Bay precinct) is supported accordingly, and that existing housing will continue to be able to readily access community and public infrastructure.</p> <p>There are a variety of public open spaces, cultural and creative spaces and community spaces approved as part of the Blackwattle Bay SSP rezoning and proposed Voluntary Planning Agreement. The change in land use mix as part of this SAPP has a negligible impact on the demand for social infrastructure compared to the SSP rezoning. The Addendum Social Infrastructure Report (dated March 2024, Appendix D of the exhibited SAPP) concludes that the planned provision of social infrastructure is generally expected to meet the demand for the incoming residential and worker populations.</p>
Traffic and Transport		
P3	<ul style="list-style-type: none"> Concern over worsened traffic flow on roads adjacent to the Blackwattle Bay Precinct. 	The Traffic Study Addendum (dated 5 June 2024, Appendix E of the exhibited SAPP) was prepared by AECOM and assessed the impact of the proposed land

	<ul style="list-style-type: none"> Traffic congestion relating to only one or two roads out of the area. 	<p>use amendments on traffic and parking. The assessment found that the proposed amendments to land use mix will generate less inbound traffic trips generated as compared to the previous approved controls, an overall 14% decrease and could result in marginal improvements in intersection performances. There is an overall 2% increase during outbound traffic in the AM peak as a result of the proposed land use amendment. The Traffic Study Addendum considers the overall AM peak traffic impacts to be negligible additional traffic impacts on the road network in comparison to the initial Traffic Study. Additionally, residents and workers will have access to the Pymont Metro Station and Metro Services with construction expected to finish in December 2028.</p> <p>The SAPP does not propose to alter any traffic, transport or parking related matters and is beyond the scope of this SAPP.</p>
P4	<ul style="list-style-type: none"> Public transport is already crowded and will be unable to service the proposed population. 	
P5	<ul style="list-style-type: none"> Suggestion that a network of pedestrian tunnels bypassing road corridors including Bank Street and Bridge Road. 	<p>Noted. This matter is not relevant to the scope of this amendment. There are no changes to the Blackwattle Bay pedestrian access and this will be considered at the detailed DA stage. Detail on pedestrian infrastructure is provided at Section 5.3 of the Design Guidelines. The SAPP does not propose to alter any traffic, transport or parking related matters and is beyond the scope of this SAPP.</p>
P6	<ul style="list-style-type: none"> Private vehicles should not be able to pass through the Blackwattle Bay redevelopment site. 	<p>As detailed in the Blackwattle Bay Design Guidelines, private vehicles will be required to enter the site to access parking provided in basements of future development. Basement entry locations will be determined during detailed design during future DAs. Private vehicles will not be allowed on any through-site links (other than maintenance or emergency vehicles). The SAPP does not propose to alter any traffic, transport or parking related matters and is beyond the scope of this SAPP.</p>
P7	<ul style="list-style-type: none"> Parking is inadequate in the area. 	
Bulk and Scale - Height		
P8	<ul style="list-style-type: none"> Building height should be limited as they are too high and will overshadow other sites. Extra height or width would be welcomed, provided it was safe and the space at ground or similar level remained for non-residential uses 	<p>There are no proposed changes to the approved building envelopes on the site and therefore the maximum building heights are already defined.</p>
Housing		
P9	<ul style="list-style-type: none"> There is no need for more housing beyond the current land use mix. 	<p>Since the finalisation of the Blackwattle Bay SSP rezoning, the demand for commercial floorspace has decreased. Sydney is currently experiencing a housing crisis with a critical shortage of housing supply, especially for affordable housing and housing close to jobs, transport and services. The SAPP aims to have the floorspace mix between residential and non-residential floorspace at Blackwattle Bay be guided by environmental and amenity constraints.</p>

Solar access		
P10	<ul style="list-style-type: none"> New apartment towers will block sunlight to surrounding buildings. Concern that reduced solar access will increase the likelihood of mould growth and contributes to poor physical and mental health. 	There are no proposed changes to the approved building envelopes on the site, which has already been approved. Amenity matters relating to solar access and overshadowing are addressed within the Design Guidelines and will be assessed as part of future detailed DAs.
Precinct Boundaries		
P11	<ul style="list-style-type: none"> Belief that the Blackwattle Bay Precinct boundary should be extended to include the Glebe Island Bridge. The design and reconstruction of the Glebe Island Bridge abutments could allow for basement and three levels above. 	This matter is not relevant to the scope of this amendment. There are no changes to the Blackwattle Bay boundaries envisaged at this stage.
Strategic Planning		
P12	<ul style="list-style-type: none"> Belief that the Pyrmont Peninsular Place Strategy (PPPS) is outdated, with new developments having requirements for non-residential purposes which are not commensurate with a current oversupply of non-residential premises and housing shortage. The proposed rezoning is an ad hoc adjustment to the PPPS being outdated. Suggestion that all planning proposals within the PPPS boundaries should be deferred until a review of the PPPS is conducted. Specific commentary on 1-27 Murray Street that it should not have height restrictions lifted from 7 storeys to 21 storeys subsequently changing its zoning to non-residential. Belief that the justification for amending Area 17 of the Blackwattle Bay Precinct should be applied to the 1-27 Murray Street site to retain its zoning of Mixed Use. 	<p>The PPPS was prepared and finalised prior to the finalisation of the Blackwattle Bay SSP. The CoS Council is currently undergoing assessment of the PPPS through the Ultimo Pyrmont Planning Proposal.</p> <p>The PPPS and subsequent Planning Proposals are not relevant to this SAPP. Further and separate consultation and assessment are being undertaken by Council to address these matters.</p>
Support for the Project		
P13	<ul style="list-style-type: none"> Delivering increased local housing supply in close proximity to infrastructure, public transport, open spaces and jobs. Strategically aligns with local, state and federal initiatives to grow local centres and deliver more housing for the community. Expectation that traffic modelling and road intersection upgrades for smoother traffic flow will be conducted to cater for the population growth. Expectation that upgrades to lightings, road safety, urban streetscapes, technology and, cater for more café outlets will be delivered to improve quality and lifestyle improvements in the CoS LGA. 	The support for the SAPP is noted.