

Andrew Pickles

PYRMONT
NSW 2009
AUSTRALIA

18 August 2020

Project Leader
Pyrmont Peninsula Place Strategy
Department of Planning, Industry and Environment
Locked Bag 5022,
Parramatta NSW 2124

Dear Sir/Madam

Re: Pyrmont Peninsula Place Strategy

1. I refer to the exhibited Pyrmont Peninsula Place Strategy, which I have read in detail, including the supporting material. I make the following submissions.

Height and scale of buildings in Darling Island and Blackwattle Precincts

2. My greatest concern is the heights nominated for new buildings in the Darling Island and Blackwattle Precincts.
3. The Key Sites Framework proposes heights of RL 180 for The Star, RL 170 for Harbourside and RL 120-156 at Blackwattle Bay. Yet, I have searched throughout the Urban Design Analysis or Strategic Framework to find any justification for any particular heights on these sites. I have found nothing. Neither is there anything in the Urban Design Analysis which shows the urban form derived from the nominated heights. This is a major deficiency.
4. The site-specific controls for the nominated key sites appear to have already been determined without any reference to any urban design study or analysis.
5. The highest the supporting reports rise to justify such heights is a comment on page 26 of the Urban Design Strategic Framework Part B which states that in order to reinforce the peninsula character, heights should step down to the water and to protect the amenity of historic streets and places in the central spine, heights should step down to Harris Street and to open spaces. This comment does not actually support the heights nominated for Blackwattle Bay and it is doubtful, without some demonstration of height and modelled shadow planes, that this would support the heights suggested for the southern end of The Star either.
6. I should add that the use of RL's without an indicator of storeys is confusing to most people and does not aid understanding. Understanding would also be assisted with a visual representation (in 3-dimensional form) of the proposed envelopes.



7. Certainly, the RL 60 nominated for the northern part of The Star is more respectful than the appalling previous 66-storey proposal by The Star, which was refused by the IPC. However, I do not see anything in the Urban Design Project Analysis that supports RL 180 on the southern part of that site. Such a tower, which I take to be approximately 50 storeys, would tower over the public spaces at Union Square and the heritage conservation area on Harris Street. It is difficult to see how a building of that height could fulfil the stated objective of maintaining the sun access plane without knowing the expected location of such a tower. I also surmise it would involve the demolition of the existing Astral tower to achieve such an outcome. In any event, it would be completely out of scale with the heritage buildings in Union Square and Harris Street and would dominate the backdrop of these important and characterful locations.
8. It is also questionable how the proposed southern tower at The Star could fulfil the intended Darling Island precinct plan, which calls for a "creativity, economic innovation and enterprise hub". I do not regard gambling as innovative or creative. Allowing The Star to get bigger as a hub for gambling and entertainment achieves none of the stated aims for the precinct. By all means identify the location as one for tourist and entertainment, but it should not be cast as being creative or innovative. The controls should also more explicitly state that residential development above The Star is not supported for achieving the aims of the precinct plan.
9. The height selected for Harbourside is no more than retrofitting the Mirvac proposal into the proposed planning controls. The tower on that site should be lower than the ICC Sofitel in order to transition heights down to the Pyrmont Bridge and Maritime Museum.
10. The heights selected for Blackwattle Bay also seem to do no more than justify the Infrastructure NSW proposals recently exhibited, without any urban design study to justify it. Again, this is reverse engineering rather than proper planning. While clearly the Fish Market site can accommodate some significant floor space, respecting the existing block forms of the central Pyrmont spine and Wentworth Park areas would appear to be more appropriate than towers reaching RL 156.

Metro proposals

11. The anticipated growth in population and floor space is necessarily dependent on a metro station. I support a metro station, but the proposed additional floor space should only be permitted if commitments are made to build one. The plan should make it clear that the anticipated growth proposed is contingent upon delivery of the metro station.
12. The metro station must also be sensitively located and ideally connect to other modes of transport. For this reason, in my opinion the metro investigation area is shown too broadly. There is a lack of co-ordination between transport planning and strategic planning. This strategic planning document should do more to inform the location of a metro station. Yet, the imprecision with which the station location is identified suggests that this is something that will ultimately be determined by transport bureaucrats alone without reference to the planning strategy. It would be preferable to more carefully specify the location for a metro now, in the context of this strategic planning document.



13. Union Square is clearly not an appropriate location for a station as its heritage character must be protected. There are some sites south of The Star bounded by Pyrmont Street, Union St and Pyrmont Bridge Road that might be suitable. However, the potential for value capture from these sites is more limited and it is not co-located with a light rail stop. This makes a metro station near the Blackwattle Bay re-development the most appropriate location both for connectivity and value capture above the station.

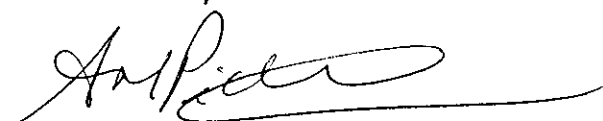
Bus rationalisation

14. Somewhat buried in the Structure Plan is a proposal to rationalise bus stops on Harris Street. This may be a supportable aim. However, the execution appears to be misguided. The Structure Plan suggests, for example, that the bus stops on Harris Street would be rationalised seemingly to place the inbound and outbound stops for the John St stop to the south of the intersection. The idea of rationalising may be good in principle, though the consequence is that the stop will be further from the John St light rail, meaning less integration and poorer intermodal connectivity, which is contrary to the stated aim of the Structure Plan.

Conclusion

15. Broadly speaking the strategy has much to recommend it and I support many of the elements. But my greatest concern, reflected in the comments above, is that the plan is attempting to 'shoe-horn' existing proposals (such as Mirvac's Harbourside and Infrastructure NSW's Blackwattle Bay) into the framework rather than proper strategic planning. The lack of justification in urban design terms for the proposed heights is a major concern.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Pickles', with a long horizontal flourish extending to the right.

Andrew Pickles