

2 September 2020

The Hon. Rob Stokes MP
Minister for Planning and Public Places
GPO Box 5341
Sydney NSW 2001

Dear Minister

Draft Pyrmont Peninsula Place Strategy

The draft Pyrmont Peninsula Place Strategy threatens to destroy the very social vibrancy and diversity that currently make Pyrmont one of the most attractive places to live, work and visit. The focus of the draft strategy is development, with overdevelopment on key sites and redevelopment of some existing neighbourhoods sanctioned and nothing to guarantee needed social infrastructure is delivered.

The draft strategy must be amended to protect communities and the qualities that make Pyrmont great so that it remains a thriving region into the future.

Social Infrastructure

The people of Pyrmont have created an inclusive, connected and supportive community and building on these values should be at the forefront of any new planning framework; but the draft strategy includes little about people or planning for engaged communities. There is no provision for public places where people could congregate to foster relationships. Social infrastructure like cultural centres, libraries, sport and recreation facilities, green open space, schools, childcare centres and medical facilities are not part of the “five big moves” and there is only a minor mention of improving community facilities in the ten key directions. The economic strategy and opportunities for sub-precinct public benefits do not include social infrastructure.

The draft strategy also fails to assess how existing facilities will accommodate the proposed increased number of residents, repeating the mistakes of the past where high density residential living was introduced without services.

The Pyrmont Peninsula Place Strategy must plan for connected communities by providing new social infrastructure and public space to meet both the needs of existing and planned populations.

Social and Affordable Housing

The draft strategy proposes replacing the Pyrmont affordable housing scheme to match other parts of Sydney. There is no explanation of what this means or how it will affect the housing mix. The Pyrmont-Ultimo scheme has delivered hundreds of social housing homes resulting in a vibrant housing mix; any change should guarantee an increase in the proportion of both social and affordable housing in the Peninsula.

There is strong and growing evidence that major redevelopment projects must deliver at least 15 per cent social housing to address the current housing crisis that has resulted in more than 60,000 tenancies on the social housing waiting list. The economic crisis caused by the COVID-19 pandemic will likely see this list grow. Pyrmont is close to jobs, services and transport, and has a supportive community making it an ideal location for social housing.

The inner city needs lower income earners like nurses, childcare workers and supermarket staff but they struggle to find appropriate accommodation that they can afford. Any inner city redevelopment should also provide a good mix of affordable homes for low income earners not eligible for social housing including key workers.



The Pyrmont Peninsula Place Strategy must include a strong social housing target of at least 15 per cent of all new housing and provide new affordable housing including for key workers.

Pyrmont's social housing communities are close-knit, supportive and cohesive and must be retained. Models like those proposed in Waterloo where social housing properties are demolished to make way for towers that accommodate a modest number of additional social housing homes along with other forms of housing would destroy Pyrmont's character.

I share widespread alarm that the draft strategy recommends a similar model, stating that the Pirrama sub-precinct – which is where most social housing in Pyrmont is located – is to be “transformed” into a mixed residential neighbourhood with 190 new residents and 350 new jobs. It proposes redeveloping small lots and older buildings including social housing to “increase affordable housing”. It is not clear if there would be additional social housing with the broad “affordable housing” term used to describe new housing opportunities.

Relocating social housing tenants would create poor welfare outcomes from disruption and uncertainty. Even if they are guaranteed a place to return to, it will be a different home, in a significantly changed neighbourhood. Such an unsympathetic, inhumane and short-sighted planning approach will not result in a harmonious, diverse and thriving precinct.

The Pyrmont Peninsula Place Strategy must rule out any redevelopment of existing social housing.

The current Sydney Fish Market site provides an opportunity to increase low cost housing in this precinct in conjunction with other redevelopment on government owned land. The government should act as a model developer and lead by example by providing additional low cost housing on this site.

Opportunities for additional low cost housing outside the Pirrama sub-precinct must be included in the Pyrmont Peninsula Place Strategy.

Key Development Sites

I share the widely held view that the aim of reviewing Pyrmont's planning framework is to justify overdevelopment proposed by developers that has been, or would otherwise be, refused. The draft strategy blindly accepts dramatic increases in bulk and scale at The Star Casino and the Harbourside sites, without any urban design study or analysis, and in spite of planning principle breaches or widespread community opposition. The strategic plan should show how planning experts determined that planning rules should change and bulk and scale should increase. The proposals threaten to erode amenity on the peninsula, removing sunlight from homes and the public domain and creating wind tunnels.

A tower on The Star Casino site was rejected by the Independent Planning Commission following community and council objections on the grounds that the proposal is out of character with Pyrmont and would overshadow and create wind and view impacts across the peninsula. While it represents a reduction in height from The Star's proposal, no strategic planning reason or community need is given to explain the value of residential and hotel accommodation or why high-rise development can now be permitted on the site. One of the two towers proposed would have a height of RL 180. Like previous proposals, this tall tower would dominate and overshadow the public domain at Union Square and Harris Street, and erode amenity in adjacent homes. Previously identified problems have not been resolved.

There is widespread opposition against the proposed Harbourside redevelopment at Tumbalong Park because the tower and podium would act as a barrier between Pyrmont and Darling Harbour, and would overshadow homes and the waterfront. The proposal is yet to be determined with inadequate modifications being proposed to attempt to address concerns. The draft strategy ignores this process and without justification states that a building of RL 170 on the site is

appropriate. This proposed high rise would breach longstanding planning principles that require heights to taper down as buildings get closer to the water – indeed it fails to comply with the draft strategy's own statement in Part B on these principles.

The strategy must not be used as a rubber stamp for ad hoc development proposals and any increases to bulk and scale must be established through clear planning analysis.

I am concerned that the draft plan has used "RL" values to demonstrate building heights at key development sites. The vast majority of people do not understand what heights these values represent and therefore cannot make meaningful comments on the proposal. Furthermore, no shadow diagrams or wind assessments have been provided making it impossible for people to understand the true impacts of the proposed high-rise. I have been contacted by a number of Pyrmont residents who are frustrated by the lack of clear information.

The public must be given an opportunity to comment on building heights represented in storeys with shadow diagrams and wind assessments.

Sydney Fish Market Site

The draft strategy adopts Infrastructure NSW's plan for massive overdevelopment on the existing Sydney Fish Market site with no analysis demonstrating how bulk and scale was determined. Proposed heights are completely out of scale with the rest of Pyrmont. Proposed towers up to RL 156 would soar above the Anzac Bridge pylons and block the harbour from the rest of Pyrmont, committing a serious planning blunder equivalent to the construction of the Cahill Expressway that has blocked the harbour from the city for six decades and has remained a challenge too difficult to fix.

The significant development proposed would create overshadowing and wind impacts across Pyrmont and the harbour; the waterfront would become an unpleasant place to linger. In addition, noise and air pollution from the Western Distributor would compromise residential amenity in homes planned for the site.

There appears to be no consideration of how the COVID-19 pandemic will change future demand for office space despite projections that working from home trends will persist after the pandemic. Google and Atlassian have already indicated that flexible work from home arrangements will continue. Proposed office towers need to be reassessed in consultation with potential commercial tenants to ensure plans deliver their accommodation needs rather than the government's wish to squeeze as much development on the land as possible.

There is also no consideration of how the massive number of new residents and workers to the region would increase demand for facilities, services and social infrastructure.

The City of Sydney council argues that a lower build would be more appropriate on the site with the harbour dedicated to new open recreation space. At least 30 per cent of this waterfront land should be dedicated public open space, with lower scale development such as office campus format permitted on remaining land. More work is needed to get the development balance right on Blackwattle Bay.

Bulk and scale at Blackwattle Bay must be reduced with harbour land freed up for public open space.

Open Space

I strongly welcome the return of the greyhound racing track to Wentworth Park. It has been a travesty that greyhound racing, which has no public value but profits from animal cruelty and problem gambling has been able to alienate green open space from the community. The move will help address the shortfall of public grasslands in the peninsula, however the additional proposed development would require significant additional public open space.

Blackwattle Bay presents a once in a generation opportunity to return harbour land to the community for public use and create a world-class open space attraction. If done right, such a park would ensure Pyrmont can reach its potential as a place to invest in. By contrast, the approach in the strategy largely would build over and privatise the land around the harbour where the Sydney Fish Market is currently located with only a small perimeter dedicated for a harbour walkway.

The strategy should protect the harbour from development and create a wide buffer zone around the waterfront covering at least 30 per cent of the Sydney Fish Market site for a new public open harbour recreation park.

There is strong support for formalising public boating facilities at Bank Street, which although have been part of past long term visions, have been put at risk by development proposals such as the plan to turn the area into a backend charter boat facility.

Sub-Precinct Development

While the community has been told repeatedly that development will be focussed on four key sites, significant development is also proposed in the sub-precincts of Wentworth Park, Pirrama and Pyrmont Village. The Wentworth Park sub-precinct is proposed to house 1,115 more people and 1,200 more jobs; the Pirrama sub-precinct 190 new residents and 350 new jobs; and the Pyrmont Village sub-precinct 135 more people and 1,380 more jobs.

Wentworth Park development will happen through new building heights on Wattle Street along the edge of Wentworth Park. Although the draft strategy asserts that park sun would be protected, taller buildings on the edge of the park would impact on amenity including by interrupting views of the city and sky, and increasing winds.

Alarminglly the strategy proposes redeveloping small lots and older buildings in the Pirrama sub-precinct to increase its density, treating this region as an empty redevelopment site. The uproot of residents from their homes to squeeze more built form onto the site is poorly justified and will cause significant impacts on people's lives and wellbeing, while destroying a harmonious neighbourhood.

Development in the Pyrmont Village sub-region would focus on the Harris Street area. Increases in height along this road could significantly undermine the fine-grain village feel of Pyrmont and its heritage values. It appears that development along Harris Street could include new homes and/or offices on the Powerhouse Museum's land, undermining community campaigns to protect the land solely for cultural and open space purposes. The draft strategy should recognise the value of the Powerhouse Museum and propose restoration works to ensure it is a world-class cultural venue into the future.

Pyrmont should not be treated as an empty in-fill site. Further sub-precinct development, especially where there are established residential communities, must be excluded from the strategy.

Continuous Walkway Linking the City

One of the biggest concerns for Pyrmont residents is the lack of direct access between Pyrmont and the central business district. The detours required by pedestrians trying to access the adjacent city as well as Darling Harbour stymie Pyrmont's economic potential.

Despite repeated calls during the Darling Harbour redevelopment, and promises from project developers, direct access from Pyrmont was not delivered in the final project. Big Move 5 refers to linking Pyrmont with Darling Harbour but there is little else on the matter.

A high-level planning strategy for the region should make improving pedestrian links with the city a priority, including in the key directions. The most appropriate pedestrian route would be to restore the Fig Street walkway.

The Pyrmont Peninsula Place Strategy must seek to restore the Fig Street walkway to ensure direct pedestrian access between Pyrmont and the central business district.

Multi-User Hubs

While there are wider purposes for the proposed “multi-utility hubs”, I strongly oppose inclusion of car parking, particularly for new residential development. Standalone car parking is a second-rate and wasteful purpose for built development and completely inappropriate in an already densely populated region that is close to jobs and services. It would risk further adding to already high traffic congestion.

Car parking must be removed from multi-utility hubs.

Metro

I strongly support the introduction of a metro station in Pyrmont. The peninsula is currently crippled by serious traffic gridlock and congested bus and light rail services, particularly from fast-moving through-traffic. New transport options are urgently needed, especially if more residents and workers are brought into the area.

Development proposed in the draft strategy must be conditional on a new metro service to the region.

The location of the station must be established in consultation with the local community as part of the strategy to meet the needs of residents and workers without creating new impacts. Any new station must not alienate the limited public open space or include over-station development that has not been considered as part of this strategy process.

Pyrmont is not an extension of the central business district but a flourishing inner city village in its own right that must be protected. I ask you to act as custodian of this thriving region and its supportive communities by ensuring the final Pyrmont Peninsula Place Strategy does not permit overdevelopment or the loss of existing social housing, has a strong social and affordable housing mix, and creates new public spaces, facilities and services including a world-class harbour park.

Yours sincerely

A handwritten signature in dark ink, appearing to be 'AG', with a long horizontal stroke extending to the right.

Alex Greenwich
Member for Sydney