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1.0 Introduction

This submission has been prepared by Ethos Urban on behalf of Poulos Bros Seafoods (Poulos Bros). Poulos Bros have operated at 21-29 Bank Street, Pyrmont since 1985. They are a shareholder in Sydney Fish Market Pty Ltd and as such, the synergies between the Bank Street site and the Fish Markets for the group are considerable.

This document responds directly to the draft Pyrmont Peninsula Place Strategy (**The Place Strategy**) released for consultation by the NSW Department of Planning, Infrastructure and Environment (**DPIE**).

Poulos Bros welcomes the release of the release of the Place Strategy and looks forward to working closely with DPIE and Infrastructure NSW on the Sub-Precinct Master Plans / State Significant Precinct plan that will provide the critical detail and subsequent planning framework.

Poulos Bros recognise that planning for the Place Strategy is running concurrently with detailed planning for the Market District undertaken by Infrastructure NSW and emphasise that the direction of the Place Strategy should inform detailed design of the market district. It appears that the current Place Strategy does not take a 'top down' approach to the Bays Market District, but has been informed by the INSW works to date.

To inform the next steps by DPIE, we make the following points for consideration in the finalisation of the Place Strategy:

- **A waterfront promenade:** Big Move 1 in the draft Pyrmont Peninsula Place Strategy (2020) focuses on delivering a "world-class harbour foreshore walk". As the most western lot in Blackwattle Bay, achieving a continuous waterfront promenade will require access to the Poulos Bros site otherwise the vision cannot be achieved. The position of Poulos Bros has always been clear, the proposed development outcomes for the site must enable the disposal of the site and the relocation of the Poulos Bros operations to a suitable location.
- **FSR equity:** The initial unwritten principle in the draft Pyrmont Peninsula Place Strategy (2020) was the equity of floor space ratio (FSR). The draft Strategy has not established a principle-based approach to 'FSR equity' and the current position clearly benefits the Government site. FSR controls should be a result of a principles, design led process to allocate heights, densities and land uses that respond, on merit, to each site's unique attributes.
- **Building Heights:** The relationship of development and the Anzac Bridge pylons has never been established as a principle to guide the redevelopment in the Precinct, however is being applied by INSW in its precinct planning which has subsequently informed the Place Strategy built forms. For example, the building heights established at Jacksons Landing, immediately north of the Poulos Bros site does not accord with this principle. The established principle of protecting Glebe Foreshore solar access should drive building height. We are of the opinion that 35+ storeys at these sites is supportable – particularly considering the proposed building heights of the government controlled lands at the existing Fish Markets site.
- **Commercial floor space:** The draft Strategy (2020) intends to increase the supply of commercial buildings across Pyrmont, identifying that an additional 600,000-800,000 sqm of floorspace will be required across the peninsula by 2041. The Framework for Key Sites identifies the prioritisation of the delivery of employment floorspace as a special consideration for Blackwattle Bay. Overall, there seems to be a lack of justification for the quantum of proposed commercial floorspace, particularly as it relates to the Poulos Bros site which is the furthest from public transport and key activity nodes. In addition to this, the current response to the COVID pandemic is for workplace flexibility and as such, there is no surety in the commercial market going forward.
- **Infrastructure contributions plan:** There needs to be an infrastructure contributions plan or framework to aid in the funding of critical infrastructure such as the Metro West and other key transport initiatives.
- **A new Metro station:** Formalise TfNSW's position for Sydney Metro West's future presence within Pyrmont, mindful of TfNSW's plans for improved multimodal transport connectivity to the precinct, including light rail, ferries, buses, and active transport with a specific focus on the role of a future Metro West project and station in Pyrmont. The draft Strategy provides the opportunity to consider and pursue wider reforms in terms of public transport and accessibility for the peninsula.

- **Tower clusters:** The tower cluster analysis prepared by Hassell (2020) does not include the Poulos Bros site, however, identifies an opportunity for a new tower cluster on the northern boundary of Bank Street, immediately opposite the subject site. The justification of this is challenged as both sides of Bank Street uphold equal strategic value and currently face the same accessibility challenges, yet the Poulos Bros site benefits from greater amenity from the harbour foreshore location.
- **A strategic opportunity lost:** In addition to being part of the study area forming the draft Pyrmont Peninsula Place Strategy, the Poulos Bros site forms part of the Blackwattle Bay precinct which is currently under consideration for greater renewal and redevelopment by Infrastructure NSW. There needs to be consistency with the strategic direction in planning for the Blackwattle Bay precinct and Pyrmont Peninsula. The draft Pyrmont Peninsula Place Strategy should also consider the site in its broader context, as planning for the Blackwattle Bay precinct will likely consider high rise redevelopment of lands at Glebe Island and Bays West. Building Heights should not be scaled down to the west and should consider 35+ storeys for the Blackwattle Bay precinct. Furthermore, the Place Strategy should set the context for the INSW Bays Market Precinct, and not the other way around.

Finally, Poulos Bros. are a shareholder in Sydney Fish Market Pty Ltd and as such, the synergies between the Bank Street site and the Fish Markets are considerable. Therefore, the viability of any redevelopment of the site must consider the significant sunk cost – and opportunity costs of additional transportation and operation costs of relocating their operations away from this Precinct.

At present, the redevelopment metrics for Poulos Bros do not 'stack up'.

2.0 Poulos Bros and the site

Poulos Bros own the site at 21-28 Bank Street, Pyrmont. The site context and comprised lots is illustrated in **Figure 1** below.

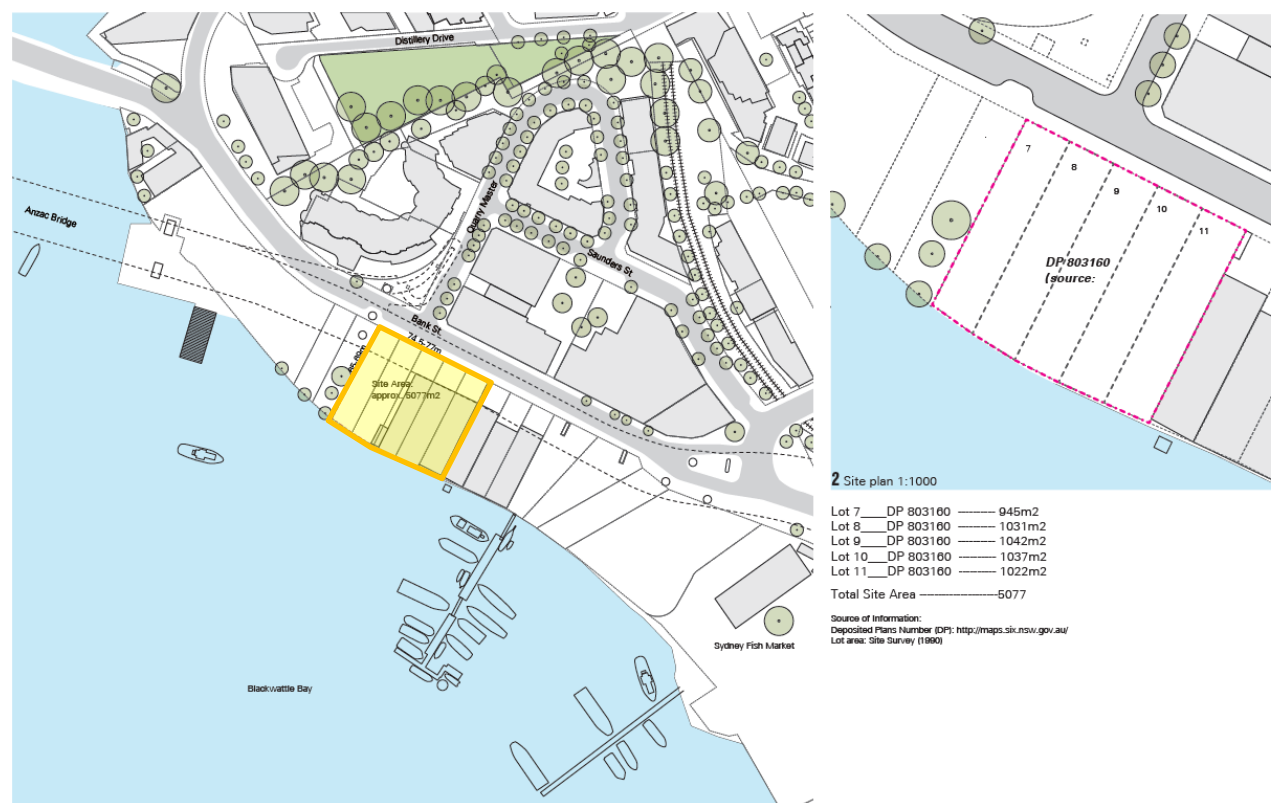


Figure 1 Site context

Source: Ethos Urban

- Poulos Bros. Group is a family owned and operated business established in 1967. Their operations have been primarily based at the Bank Street site when it was purchased in 1985 prior to the construction of the Anzac Bridge. The Poulos Bros Group business includes:
 - Headquarters and distribution centre at the Bank Street site;
 - Two wholesale operations in the Sydney Fish Market; and
 - A processing and distribution centre in Brisbane and Melbourne.
- The business is among the largest independent wholesaler of fish in Australia, operating a fleet of 30 vehicles with around 150 vehicle movements daily. It is a major contributor to the local economy, supplying to restaurants, hotels and the casino in Sydney's CBD and employs over 100 people on site.
- Poulos Bros operate at the Bank Street site as they rely on access to the harbour foreshore and the surrounding arterial road network to distribute supplies.
- The site presents an opportunity for urban renewal in response to the strategic direction for new housing and jobs within a '30-minute city' as established by the GSC and DPIE. Further, this site holds high strategic value; positioned adjacent to Blackwattle Bay and the future open space proposed in the Plan – being the last private landholding on the western part of the land that forms the Bays Market District.

3.0 The Broad Vision and Strategic Directions

The draft Pyrmont Peninsula Place Strategy (2020) establishes a clear vision for Pyrmont Peninsula:

In 2041, the Pyrmont Peninsula will be an innovative, creative and cultural precinct and an engine room of the Eastern Harbour CBD. It will connect to the Innovation Corridor and other innovation and job precincts via Sydney Metro and complement the Sydney CBD.

The 10 Directions that have been identified to guide growth to 2041, with the intent of addressing matters of strategic economic, social and environmental significance in the Pyrmont Peninsula are all supported. These are supplemented by 5 Big Moves that are seen as broader and more strategic in their delivery that are again supported at a high level.

It is evident however that many of the established 10 Directions to guide growth in Pyrmont Peninsula broadly cascade from the delivery of a new Metro station – one of the 5 Big Moves. Strategic opportunities derived from the 10 Directions are established at a finer grain, with the draft Pyrmont Peninsula Place Strategy (2020) identifying sub-precincts. The Poulos Bros site is located in the Blackwattle Bay sub-precinct.

In response to the strategic directions established by DPIE, Poulos Bros raise the following concerns.

3.1 Big Move #1 and Strategic directions for a harbour foreshore walk

Under Big Move 1, DPIE focuses on achieving “a world class harbour foreshore walk”. As the most western lot in the Blackwattle Bay area immediately adjacent the future open space, achieving a continuous harbour foreshore walk will require access to the Poulos Bros site, otherwise the vision cannot be achieved.

Urban renewal of the Poulos Bros site, including the delivery of a harbour foreshore walk, will increase visual and physical links to the wider Bays precinct and Sydney Harbour, enhancing connections to nearby residential locations, widening access to the labour catchment and a strategic opportunity for the Innovation Corridor. It will also create immense tourism benefits for the NSW Government and the local economy.

As shown in **Figure 2**, should redevelopment of the Poulos Bros site not occur, any hope of a continuous and connected harbour foreshore walk will be lost. If a feasible outcome is not reached, Poulos Bros will continue to operate at the site and a harbour foreshore walk cannot be delivered.

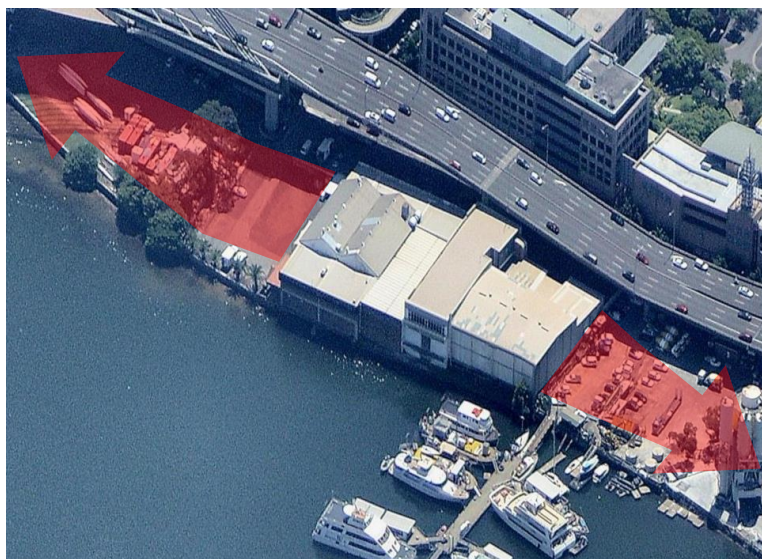


Figure 2 The Poulos Bros site harbour interface

Source: Nearmap

Further, Poulos Bros understand that INSW are investigating a floating pontoon as an alternative to a foreshore walkway link. This is clearly an indication of Government’s tacit recognition of the questionable viability of the Poulos Bros site.

3.2 Strategic directions for commercial floorspace

Poulos Bros raise concern regarding the context of job growth established in the vision and 10 Directions for Pyrmont Peninsula. The draft Strategy intends to increase the supply of commercial buildings across Pyrmont, identifying that an additional 600,000-800,000 sqm of floorspace will be required across the peninsula by 2041.

This is in the context of over 1,000,000sqm of additional commercial floor space as anticipated in the Central Sydney Planning Scheme.

Poulos Bros acknowledge that an integration of land use activity is critical to the success of Pyrmont. With this, it is also recognised that job growth is critical to Pyrmont, however Poulos Bros emphasis that place-based nuances regarding the location of new jobs, need to be carefully considered.

The Poulos Bros site is clearly not suited to a high proportion of non-residential floorspace.

For example, due to the site's distance from existing and planned transport infrastructure, any commercial land uses will likely generate capacity impacts on the local road network as will generate greater traffic than a residential use. The Poulos Bros site and the immediate surrounds are relatively isolated and disconnected from activity nodes and public transport. Future growth at this part of Blackwattle Bay will need to address connectivity and access constraints before significant volume of commercial floorspace aspirations are applied.

Further, allocating a quantum of floorspace aspiration needs to consider market dynamics in terms of the location of the Poulos Bros site within the context of city fringe centres. Future commercial floorspace at Blackwattle Bay will compete with more desirable city fringe locations. For instance, there is already a well-established media and innovation cluster on the eastern fringe of Pyrmont, with strong public transport and pedestrian access to the CBD. Another contributing factor to market dynamics is the need to secure pre-commitment in order to deliver large commercial floorplates and in this current market and the shift in the way people work, it will take some time to generate demand. Particularly if rental values and occupancy rates in Sydney CBD start to decline, this will have flow on impacts to the Blackwattle Bay market.

Finally, in the current circumstances of the COVID pandemic – there is no certainty as to the long term commercial market. This submission seeks a reduction in the non-residential floor space requirements of the plan.

4.0 Structure Plan

Shown in **Figure 3** below, the draft Structure Plan sets out the spatial interpretation of the vision and 10 Directions. The draft Structure Plan establishes a framework of the Peninsula with movement and open space networks linking neighbourhoods and places, whilst setting the context for the future sub-precinct master planning.



Figure 3 Pyrmont Peninsula Structure Plan

Source: NSW Department of Planning, Industry and Environment

The draft Structure Plan “sets the foundations to take the Peninsula to the next level as a jobs hub, while ensuring key placemaking and public benefit outcomes are secured with growth and change”. DPIE indicate that this is intended to be achieved through the delivery of:

- A diverse, connected, restorative public domain;
- An integrated movement network;
- Ridgetop village character and community;
- Significant renewal sites at parks and harbour edge.

Poulos Bros broadly support the draft Structure Plan, particularly DPIE’s outlined focus on “significant renewal sites at parks and harbour edge”. Though, Poulos Bros note that this focus is not reflected in HASELL document showing location opportunities for ‘tower clusters’. This is further discussed in the Framework for Key Sites below.

5.0 Framework for Key Sites

The Framework for Key Sites identifies the Star, Harbourside Shopping Centre, UTS Ultimo/Haymarket and Blackwattle Bay as Key Sites. These sites have been selected by DPIE under the assumption they will experience the greatest growth and change over the next 20 years.

The identified Blackwattle Bay Key Site includes the Poulos Bros site. DPIE note the principles of transparency, equity and probity have formed the basis for developing the Framework for Key Sites.

The draft framework outlines the following opportunities for additional public benefits for Blackwattle Bay Key Site:

- deliver 'low-line' beneath the Anzac Bridge pylons and the Western Distributor overpass
- a ribbon of activated, public open and recreational space, including formalised recreational boat facilities for Dragon Boats delivery of cultural and/or entertainment floorspace for recreation, meetings, events and new attractions.

The Poulos Site can deliver public benefit to the precinct through the potential of incorporating the Dragon Boat facility into any development, therefore freeing up much valued public open space. This has been discussed with INSW.

The following special considerations are identified for Blackwattle Bay, including:

- Sun access plane not breached, diversity of building heights with upper ranges limited to RL120-RL 156
- Prioritisation of the delivery of employment floorspace.

Importantly, the site is not affected by any heritage or character overlays and, as such, is relatively unencumbered to deliver greater GFA.

Poulos Bros do not agree with the special considerations, and are of the opinion that they, therefore, will encumber the ability for these sites to deliver the desired public benefit. These matters are discussed below.

5.1 Response 1: Building Heights based on Anzac Bridge pylons

It is clear that DPIE are moving away from increasing density at the northern end of Blackwattle Bay, where Poulos Bros site is located.

Poulos Bros suggest this further testing is needed as the heritage significance of these pylons and the implications for protecting the visual amenity is not backed up by evidence in the urban design technical reports.

There is inequality across Pyrmont peninsula with government lands identified as key catalysts of growth. This has been seen at Barangaroo whereby height was no obstacle to growth at the harbour foreshore. The NSW Government's view on respecting the heritage pylons of the Anzac Bridge is a position that has not been applied on development sites within the immediate vicinity, including Jacksons Landing.

Previous plans and strategies for Pyrmont and Blackwattle Bay have not specified the importance of height responding to the heritage pylons of Anzac Bridge (40 storeys). The focus on height disregards the economic role of the precinct and the employment floorspace that could be contributed within the context of Global Sydney.

Considering the building heights proposed for the government-controlled Fish Markets site, as well as existing heights of waterfront precincts such as Darling Harbour, Barangaroo, Circular Quay and Cockle Bay, we are of the opinion that additional height at the Poulos site is acceptable.

5.2 Response 2: Tower clusters

The Urban Design technical report undertaken by Hassell (July 2020) has informed DPIE's position on opportunities for tower clusters the draft Pyrmont Peninsula Place Strategy (2020). **Figure 4** illustrates that the Poulos Bros site has been identified as a site capable of change and this aligns with the vision for Blackwattle Bay as a media hub, tourist destination and new mixed use quarter as outlined in the Structure Plan.

Given the draft Strategy (2020) intends to deliver high rates of growth across Pyrmont Peninsula by 2041, there is clear opportunity for the Poulos Bros site, as recognised as a site capable of change, to accommodate some of this demand given the high strategic value and foreshore amenity.

However, the capability to accommodate change has not translated to the opportunity areas for taller building clusters (Figure 4). The taller building cluster excludes the Poulos Bros site, including land immediately opposite, on the northern boundary of Bank Street. There is no technical evidence that supports this direction. The northern part of Bank Street upholds the same level of strategic value and is exposed to the same accessibility constraints as the Poulos Bros site. This land is also within the vicinity of the Anzac Bridge pylons and therefore should be treated equally in terms of respect for heritage.

It is evident that this is not the case and therefore Poulos Bros question why their site has been excluded from the tower cluster when DPIE have recognised the site is capable of change.

Poulos Bros note that the harbour foreshore walk has been included in the tower cluster opportunity map. Again, if a feasible outcome is not reached, Poulos Bros will continue to operate at the site and a harbour foreshore walk cannot be delivered. Further, the under-bridge activation sought in the plan, as well as the activation of the foreshore will not be delivered if adequate GFA is not allowed at the site.

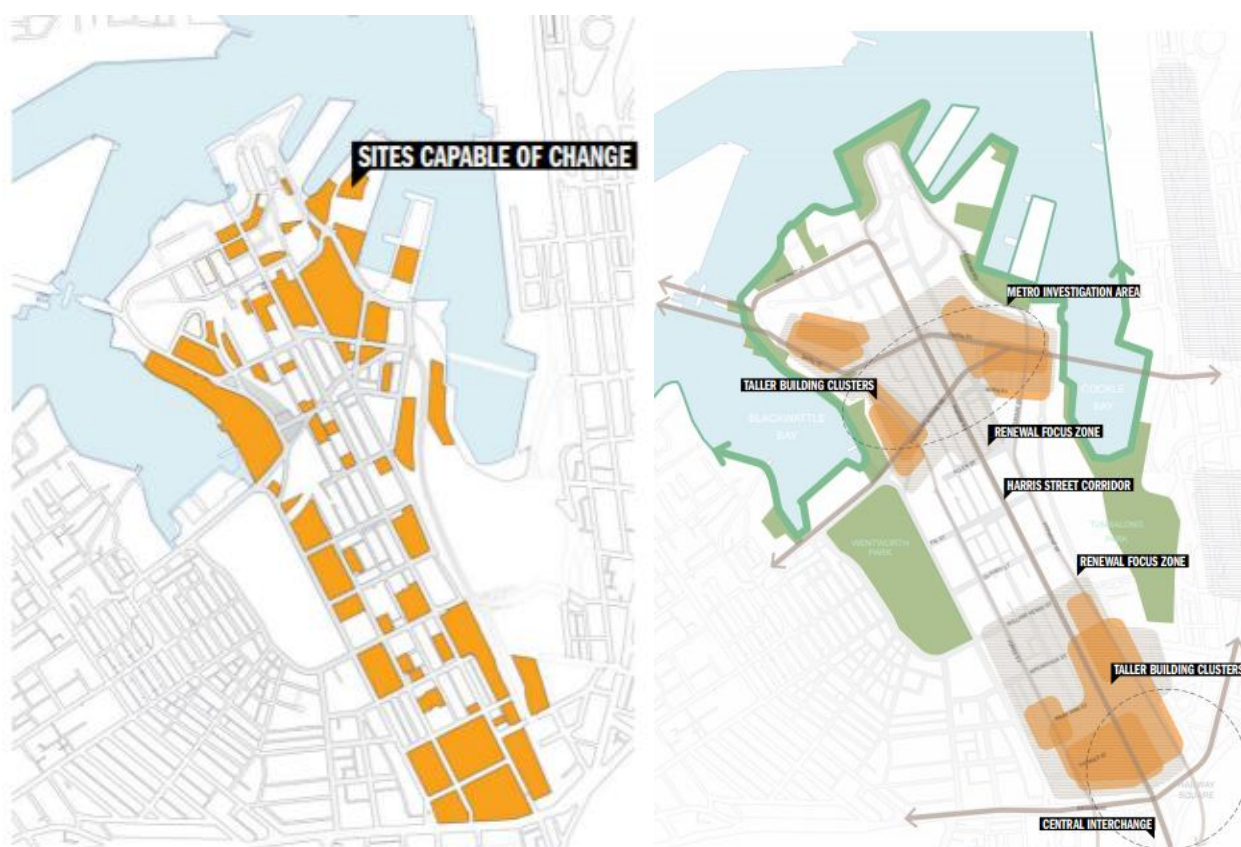


Figure 4 Sites capable of change & Taller Building clusters

Source: Hassell, July 2020

5.3 Response 3: Principle of “stepping down of building heights”

The Framework for Key sites proposes building heights with upper ranges limited to RL120-RL156 for Blackwattle Bay Key Site. It is believed the basis of this has been informed by the height strategy developed by Hassell in the urban design analysis (July 2020). The height strategy has applied a “stepping down” approach (see Figure 5) which considers the following attributes:

- Reinforcing the special historic character of the peninsula
- Protecting the amenity of key spaces and streets
- Recognising that many sites across the peninsula are unlikely to undergo renewal.

It is believed the approach of the height strategy takes a stepping down of building heights from the topographic high points within the peninsula to the harbour edge to protect the character. The analysis notes this is a key differentiator of the place and an attractor of workers and residents. However, it is unclear how the “stepping down” approach to building heights outweighs opportunity to deliver new homes and create jobs, whilst celebrating and protecting the amenity.

The height strategy notes solar access planes have been applied to new buildings to protect sunlight into the peninsula’s parks, plazas and main streets, however capacity testing has not been tested.

Overshadowing analysis undertaken demonstrates no overshadowing of the Glebe Harbour Foreshore for buildings of over 35+ storeys without solar impact implications. Given this, Poulos Bros extend the question of how basis for building heights has been determined.

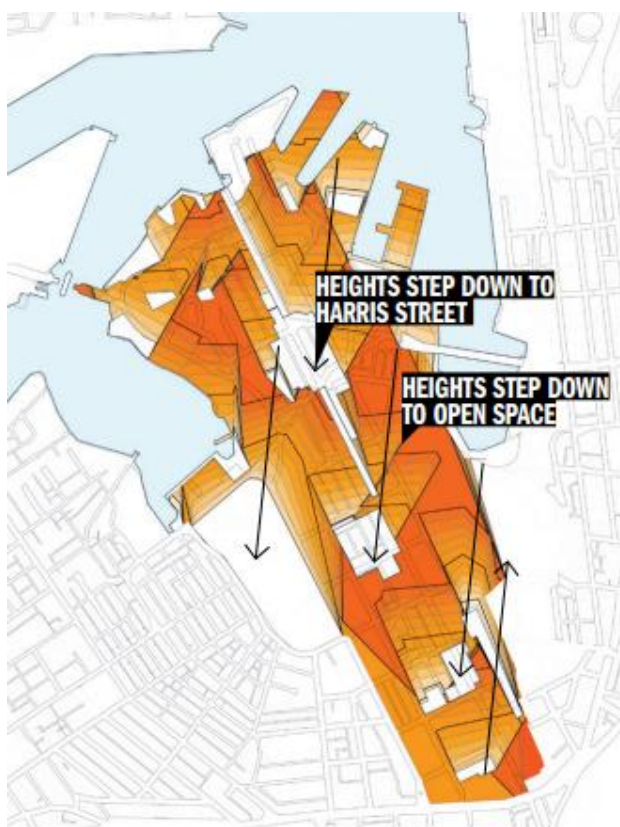


Figure 5 Height Strategy

Source: Hassell, July 2020

Poulos Bros site has the potential to deliver densities greater than what has been proposed in the draft Pyrmont Peninsula Place Strategy (2020).

Considering the height profile of the buildings beyond the site, being Barangaroo and the Crown Tower, a building of minimum 35+ storeys at Poulos Bros site would:

- Achieve better context with the building heights on the Government land and the future renewal of areas west of the site;
- Provide suitable development feasibility to enable Poulos Bros relocation;
- Activate the foreshore and adjacent park and activate the (lesser) non-residential uses such as commercial and retail activities within and surrounding the site;
- Be in context with other tower sites across the peninsula, as well as other waterfront sites from Circular Quay, Barangaroo, Cockle Bay and Darling Harbour.
- Allow additional social and affordable housing that could be delivered in the scheme;
- Result in a far lesser car park generation than the three options presented by INSW in terms of land use mix.

Achieving this growth is consistent with recent urban renewal precincts within the vicinity of Blackwattle Bay as illustrated in **Figure 6** and **Figure 7** below.

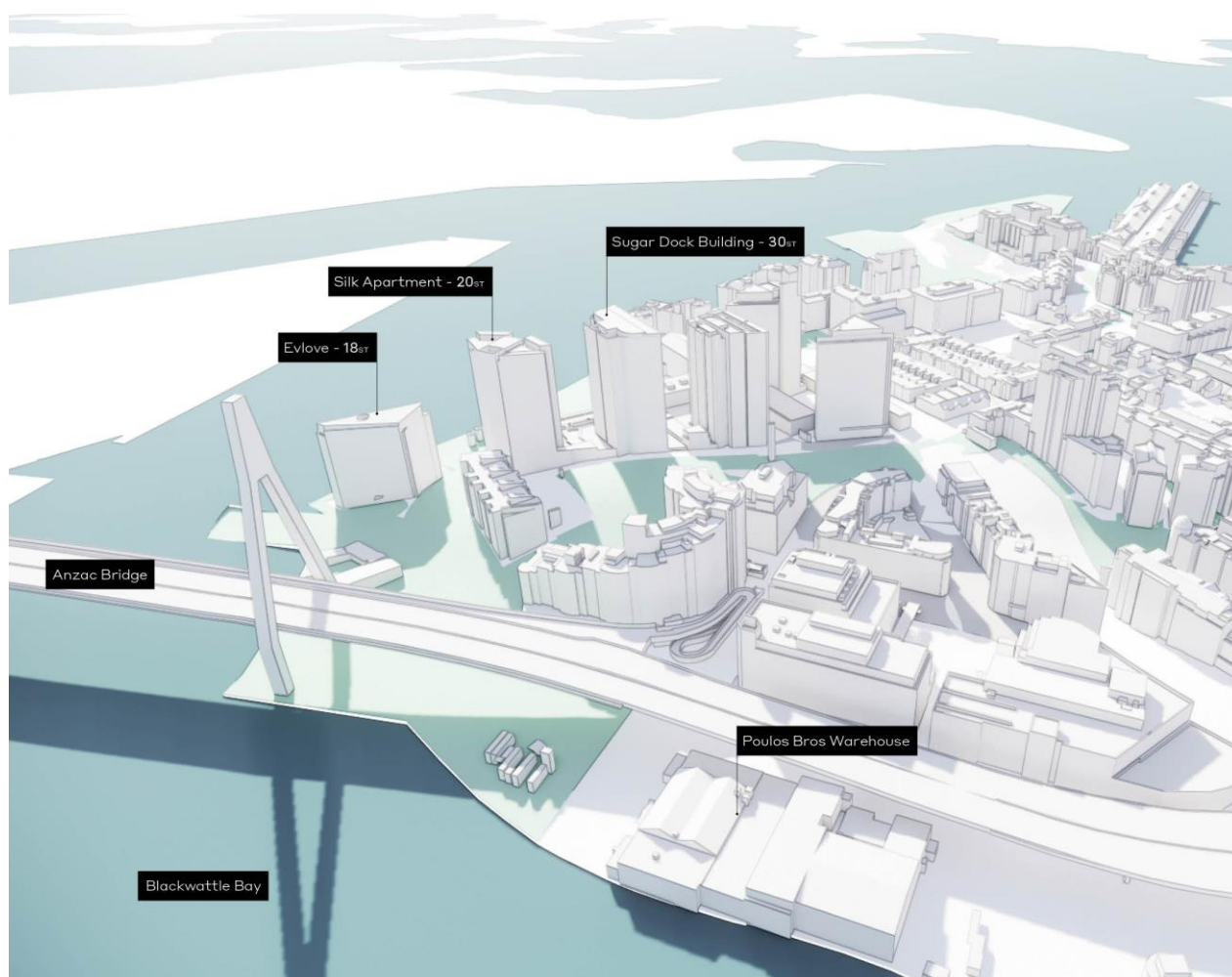


Figure 6 Jacksons Landing height reference

Source: Ethos Urban

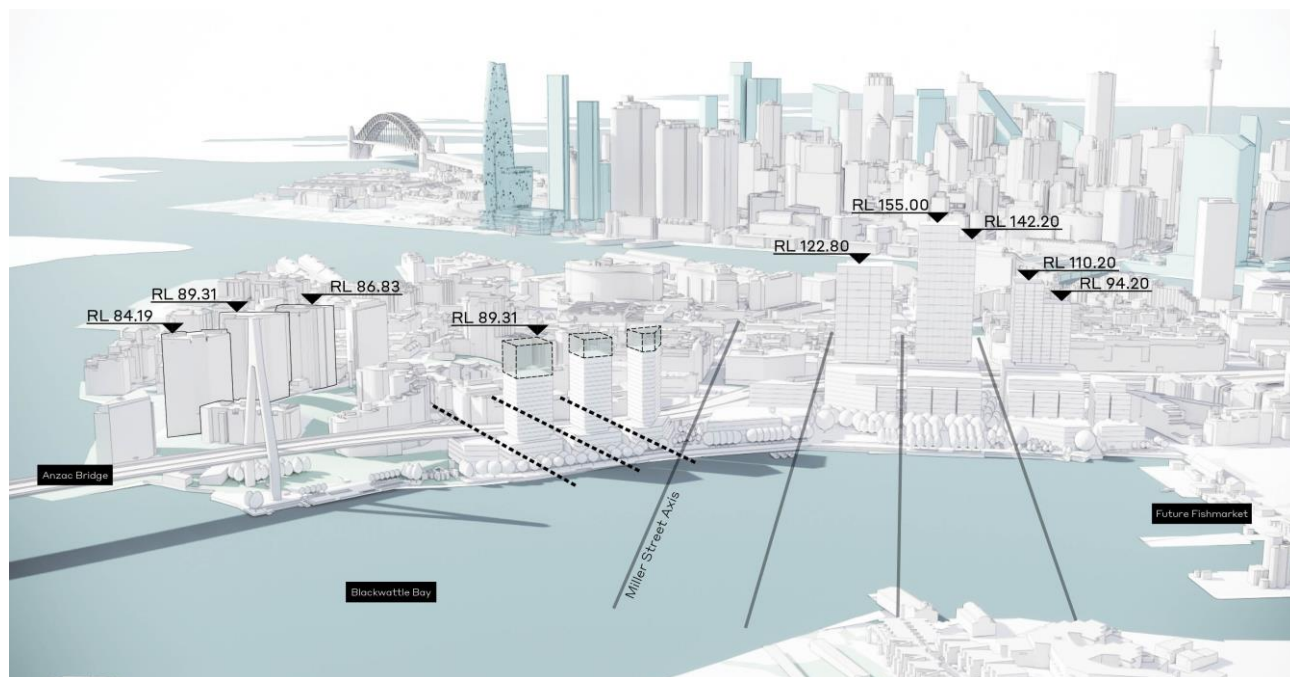


Figure 7 Jacksons Landing height reference

Source: Ethos Urban

5.4 Response 4: Equity of FSR

Poulos Bros raise the inequality of FSR approach put forward by INSW in their detailed master planning that has subsequently informed the draft Strategy. The initial unwritten principle was the equity of floor space ratio (FSR). Given the size of the government site, the principle put forward for FSR is illogical and does not follow sound planning and design-based principles.

FSR controls should be a result of a first principles, design led process to allocate heights, densities and land uses that respond, on merit, to each site's unique attributes. It is not a considered approach to lead from an 'FSR equity' principle to guide good development.

The FSR for the Poulos Bros site is meagre when compared to those adjacent and near the site as part of Global Sydney. This is emphasised within the context of the current form and heights of buildings on the Pyrmont peninsula. Poulos Bros support a range of options for height and form (and resultant FSR) across the new precinct, based on principles that have been established by the review and or adjusted by our approach.

Poulos Bros note that the allocation of FSR principles needs to consider the distribution of non-residential floorspace. The draft Pyrmont Peninsula Place Strategy (2020) is not supported by viability studies demonstrating support for non-residential floorspace in a location that is isolated from public transport and main office floorspace on the eastern boundary of the precinct.

Our feasibility testing shows that non-residential floorspace on the site is unviable and will therefore inhibit the funding of infrastructure and rejuvenation of the waterfront promenade.

In terms of car parking and traffic, considering the location of the site it would be expected that residential uses would have far less car parking demand and traffic generation than commercial uses of the yields put forward by INSW. We believe the decision to install this quantum of commercial floorspace without any immediate public transport accessibility is questionable and will require greater levels of car parking to make up for this poor public transport accessibility. This will result in poor urban outcomes, namely:

- Higher traffic generation and impact on the pedestrian environment sought in the design principles.
- Exacerbation of the current traffic issues facing the site – resulting in a further perverse impact on the viability of the commercial floorspace.
- Basement car parking will be highly costly considering the location of the site, and likely be required to be delivered above ground (sleaved) which is troublesome when needing to deliver large amounts of car parking.

We are of the opinion that the preferred land use should reflect the broad trend of the area and suggest residential with ground floor activation and some minor and ancillary non-residential spaces that have inherent flexibility to allow commercial uses over time.

6.0 Conclusion

Poulos Bros welcomes the opportunity to work with DPIE on the refinement of the Pyrmont Place Strategy and look forward to ongoing dialogue on the subsequent detailed master planning and planning control implementation.

We acknowledge that the purpose of the strategy is to develop a vision and plan which will while protect the area's unique heritage, liveability and long-term sustainability, however balance must be struck to allow the Peninsula's continuing evolution that maximises its economic and social potential. In this regard, the amendments sought in this proposal speak to the overarching driver for the Peninsula to become the attractor for global investment.

The Greater Sydney Region Plan identifies the Western Harbour Precinct and Pyrmont Peninsula as an emerging innovation corridor and a western a gateway to the global Sydney CBD. With some inherent flexibility, the aspirations for high job numbers and homes within the 30-minute city catchment can and will be delivered at this strategically important Key Site.

We welcome the opportunity to provide further information to the Department as it finalises the Strategy and look forward to a continued dialogue.