

Submission to Pyrmont Peninsula Place Strategy



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Executive summary

As part of their independent Planning Framework Review of the Pyrmont Peninsula in September 2019, the Greater Sydney Commission (GSC) found the following:

- Finding 1:** More comprehensive and detailed planning at the local level is required to deliver the Innovation Corridor vision for the Pyrmont Peninsula
- Finding 2:** The current planning framework promotes a project-based approach over a place-based approach to planning outcomes
- Finding 3:** There is no coordinated spatial plan to guide assessment of competing project priorities to deliver place-making outcomes
- Finding 9:** A number of major projects, on the edge of the Peninsula, are being planned but are disconnected from each other, and
- Finding 10:** The economic potential of the Peninsula is not supported by a coordinated economic strategy.

- The GSC's Review found, that for the Pyrmont Peninsula planning framework to be 'fit for purpose' to deliver the vision of the Greater Sydney Region Plan and Eastern City District Plan, a place-based approach that implements plans holistically must be adopted.
- The City generally supports the intent of a place-based, people-focused review of the planning potential for the Peninsula. This is the approach taken to all our planning.
- The City generally supports the Region and District plans, supported by the City's Local Strategic Planning Statement – City Plan 2036, which speak to the importance of getting the planning right for the Innovation Corridor associated with Central Sydney.
- The Region and District plans support the delivery of high-quality place-based outcomes that integrate site-specific planning proposals with precinct-wide place and public domain outcomes through place-based planning.
- The GSC Review states that this method of planning provides a better understanding of a place. By taking a place-based approach and improving the coordination of significant projects, this will contribute to better place-based outcomes, particularly in linking public domain and connecting the major precincts, including Blackwattle Bay.
- The draft Pyrmont Peninsula Place Strategy and supporting documents propose to be a first step in a planning review for the Peninsula. The City generally supports the high level 10 Directions, the Five Big Moves and the approach of sub-precincts provided this is led by the City of Sydney. We acknowledge the need for greater community involvement, careful tested development modelling, clarity and commitment.
- The City supports the prerequisites a metro station and the need for matching green space (suggested through the return of Wentworth Park as green open space at the end of the current lease term) and a unified planning framework for the Peninsula.
- The City does not support the continuation of State Significant Developments (SSDs) as a result of the Strategy. All sites should be transitioned into the Sydney LEP. Consistent with the ten Directions, there must be an action for a unified planning framework. A unified planning framework will bring the inclusion of all State Significant sites into the Sydney LEP; if not, this Strategy will be another planning intervention like so many others before it.

- The lead in developing sub-precinct controls must be undertaken by the City of Sydney in accordance with the strategy's directions and big moves based on the State committing to a metro station(s). This is essential for additional floor space capacity over and above the capacity that already exists, to be contemplated.
- For an Infrastructure Delivery Plan's development and supporting document finalisation, the Department of Planning, Industry and Environment (DPIE) and the City of Sydney must establish the direct ongoing involvement of residents and businesses. This is to ensure the final Place Strategy better aligns with the Infrastructure, Liveability, Productivity, Sustainability, Governance and Implementation priorities of the community and the Eastern City District Plan and the City Plan 2036.
- Failure to address the above points places at risk the NSW Government's Innovation Corridor vision for the Pyrmont Peninsula and the economic potential, unique character and amenity of this land at the heart of the Harbour CBD.

Key issues

Productivity

The draft Place Strategy needs to more explicitly align with Planning Priority E7.

The City's qualified support of the draft Pyrmont Peninsula Place Strategy (PPPS) is predicated on the metro station as part of Sydney Metro West. This is necessary for any additional floor space growth associated future work space, visitor accommodation, affordable enterprise space, high technology industrial, retail, community, cultural and entertainment uses.

This is consistent with Planning Priority E7 of the District Plan which is to:

- prioritise public transport projects to the Harbour CBD to improve business-to-business connections and support the 30-minute city, and
- strengthen the international competitiveness of the Harbour CBD and grow its vibrancy by:
 - further growing an internationally competitive commercial sector to support an innovation economy
 - providing residential development without compromising commercial development
 - providing a wide range of cultural, entertainment, arts and leisure activities
 - providing a diverse and vibrant night-time economy, in a way that responds to potential negative impacts, and
- review planning controls to facilitate economic activity to deliver on job targets.

Draft sub-precinct place priorities are too open, particularly for Blackwattle Bay, meaning significant residential floor space is likely and the Wentworth Park sub-precinct (rather than the parkland) should include a priority to ensure a genuine mix of business and residential uses. The planning framework will need to explicitly prioritise future knowledge uses to strengthen existing innovation clusters if the vision is to be achieved.

Effects of Covid-19

It is yet to be seen what the lasting effects of the health pandemic will be on knowledge-based workspace and productivity. Technology has recently demonstrated that distributed working and remote working can be effective for a time. However, flexible working is only effective for project teams if they have an anchor workspace which delivers something that remote working cannot.

The future environment for business innovation will evolve and is likely to entail a wide variety of collaborative space including lab spaces, co-working spaces, knowledge sharing spaces such as

auditoria, seminar and workshop spaces. The sophistication of work places directed towards innovation will include more than traditional commercial office space has to offer. Yet, the ongoing social impacts of community transmission may affect the demand and attribution of new work space.

A recent survey by the Department of Planning, Industry and Environment has shown that 46 per cent of people spent more time in public spaces than before Covid-19 restrictions. While the draft PPPS may have been prepared without the full knowledge of the impact of Covid-19, the final version of the Place Strategy must consider the increased demand for public open space in addition to what will be a proportionate increase in demand from residents, workers and visitors to the area.

Key sites and sub-precinct master plans

The draft Place Strategy provides little detail on how the 'opportunities for additional public benefits' and 'special considerations' for 'key sites' were derived. Key sites appear to refer to State Significant Development sites. The subject matter relates to new maximum heights at Blackwattle Bay, the Star and Harbourside and how 'public benefits' like the provision of active street frontages, which are a standard requirement of any redevelopment, will be mapped out and secured.

It is inappropriate to draw conclusions on building height and public benefits when sub-precinct master planning and Infrastructure Delivery Plan discussions have not commenced. It reads as a confirmation of existing project-based approaches to planning, critiqued by the GSC.

The City does not support the new maximum heights envisaged for The Star and Blackwattle Bay, nor their continued treatment as State Significant Development under a different planning framework. Towers in these locations are completely out of context with the established character of the surrounding area and will result in significant impacts and precedents on surrounding development and amenity. The draft Place Strategy must not be used to justify such towers on State government-owned sites which are clearly inconsistent with the ten Directions.

Directions for 'key sites', including heights and public benefits, should be made at the completion of the sub-precinct master planning process, informed by the final Infrastructure Delivery Plan. Both the sub-precinct master plans and the Infrastructure Delivery Plan should be exhibited as drafts before being finalised to inform future planning proposals and planning controls.

The City supports the extension of solar protection planes to establish heights but is concerned that extending heights to aviation limits beyond those planes in these locations, does not consider or complement the character and heritage of Pyrmont as described in the vision. The public benefits to be delivered by State-owned 'key sites' must be genuine. Active frontages and improved servicing are already expected outcomes from good planning and not additional public benefits. Contributions to affordable housing, work and cultural space should be explicit policy positions and required to be made in all cases.

Any future sub-precinct master planning should consider the cumulative impacts of industrial activities at Glebe Island on residents of the Pyrmont peninsula. The City urges DPIE to liaise with the Port Authority of NSW and the NSW Environment Protection Authority during this process to ensure that noise pollution is carefully managed in the context of existing approvals and envisaged growth.

Implementation

The City requests that planning and development assessment for all sites identified within the draft Place Strategy are unified into the Sydney LEP with determination by the Central Sydney Planning Committee (CSPC). The legacy isolation of these areas and sites from the City's planning framework results in disconnected planning processes and outcomes for the City's residents, workers and visitors, and which the draft PPPS has failed so far to address.

The CSPC was set up by the State Government as a collaborative decision-making body with a majority of state nominated representatives. It currently includes the Deputy Secretary of Place, Design and Public Spaces (DPIE) and the NSW Government Architect. The draft Place Strategy presents a generational opportunity to unify planning through the Sydney LEP.

A place strategy provides a framework for planning proposals to ensure consistency. It is recommended that sub-precinct master plans be implemented through planning proposals consistent with the draft Guideline to amend the City's LEP and determined by the Central Sydney Planning Committee. Staging and integration of sites or sub-precincts should be based on priority according to the vision, infrastructure, employment potential and opportunities. In addition, a Ministerial Direction could better manage out-of-sequence proposals.

Outdated NSW planning instruments such as Darling Harbour Development Plan No 1 and SREP 26 - City West should be incorporated into the Sydney LEP as a unification action of the Place Strategy.

Necessary Infrastructure

The City will likely have a role in delivering and maintaining a large proportion of the required infrastructure in the Place Strategy area. The City and the community should be intimately involved in the Infrastructure Delivery Plan development.

A working group for Infrastructure Delivery Plan prioritisation and development and a governance framework for coordinated infrastructure delivery, between the State Government, the City of Sydney, infrastructure providers, land developers and the community could be established.

A Place-Based Infrastructure Compact could be considered for the Peninsula to bring state agencies and budgets along with project timing. This will enable infrastructure projects to be prioritised and committed to through NSW Budget, NSW State Government agency and City asset management strategies and capital works programs. This will provide more certainty to the community that as the city grows, infrastructure is provided in the right place at the right time.

A priority should be the refurbishment/restoration of the Glebe Island Bridge, which is a pair with the Pyrmont Bridge in Darling Harbour. It represents 'key infrastructure' vital for active (and potential public transport) links across the bay. This heritage listed bridge should be immediately refurbished/restored before it is allowed by TfNSW to deteriorate anymore. It will become a vital link in the realisation of the harbour promenade, connecting the peninsula and Harbour CBD upriver to the west.

Damaging Infrastructure

Pyrmont suffers scarring by the prominent Western Distributor, effectively dividing the peninsular in two and Harris Street in half. Cities around the world are healing these scars from the 1960s and 70s and repairing the cityscape. TfNSW, DPIE and the City of Sydney should undertake a joint study to investigate reducing or eliminating ramps and roadways, and a more holistic study which considers the feasibility of undergrounding of the route as far as possible.

Recommendations:

The Five Big Moves

Recommendation 1:

A station as part of Sydney Metro West must be constructed in Pyrmont by 2028, including public domain renewal and entrance locations required to support development uplift and should be committed to prior to significant changes to the planning framework.

Recommendation 2:

The refurbishment and upgrade of the Glebe Island Bridge as an active transport (and potential public transport) link should be committed to as an extension of the identified foreshore walk.

Recommendation 3:

The Place Strategy should include clear positive requirements and incentives for cultural and creative floor space.

Recommendation 4:

The Place Strategy should include measurable sustainability and canopy targets as per the Pyrmont Peninsula Sustainability Framework Scoping Report (see Recommendation 31).

Recommendation 5:

The return of Wentworth Park to community use as public green open space is essential to enable additional development capacity. A public demonstration of this commitment should include accounting for the cost of removal of the structures, cost of reinstatement of the park, and a public commitment not to renew the current lease.

The Structure Plan

Recommendation 6:

The Structure Plan should be developed through the next stage of sub-precinct planning with more clarity in both the key and the plan itself as to its implication for individual land owners and the peninsula.

The seven sub-precincts

Recommendation 7:

The City should lead the development of the sub-precinct master plans. Draft sub-precinct master plans should be publicly exhibited prior to being finalised. Sub-precinct master plans should:

- be stronger in their reference to Planning Priority E7 of the Eastern City District Plan to permit limited residential development without compromising commercial development
- protect public views, including the eastern Martin Place view corridor
- in relation to building heights, be based on the principles outlined in Recommendation 19.
- each development site being subject to review and testing prior

The Key Sites

Recommendation 8:

The ten Directions include unification and simplification of the planning framework. State Significant Site and 'key sites' should become part of Sydney LEP.

Recommendation 9:

Infrastructure NSW (the proponent) must align progress and outcomes of the master plan for Blackwattle Bay with the finalisation of the Pyrmont Peninsula Place Strategy and sub-precinct planning.

Infrastructure

Recommendation 10:

The community and the City should be involved in the next stage of Infrastructure Delivery Plan development.

Recommendation 11:

The Place Strategy and the Infrastructure Delivery Plan could be supported by a Ministerial Direction requiring any growth to be aligned with infrastructure delivery.

Recommendation 12:

Use a Contributions Plan and a Place-Based Infrastructure Compact for the peninsula that addresses the final Place Strategy and the Infrastructure Delivery Plan.

Community, cultural facilities, open space and recreation facilities

Recommendation 13:

The Pyrmont Peninsula Social Infrastructure Assessment should be updated noting the detailed comments on community, cultural facilities, open space and recreation facilities in this submission and community submissions.

Recommendation 14:

That Infrastructure Delivery Plan be developed based on the final Pyrmont Peninsula Social Infrastructure Assessment in collaboration with the City.

Transport interventions

Recommendation 15:

The Pyrmont Peninsula Place-Based Transport Strategy should be updated noting the detailed comments on the transport initiatives in this submission and the early refurbishment/restoration of the Glebe Island Bridge.

Recommendation 16:

That Infrastructure Delivery Plan be developed based on the final Pyrmont Peninsula Place-Based Transport Strategy.

Mechanisms for implementation

Recommendation 17:

The Infrastructure Delivery Plan must include the establishment of a governance framework for coordinated infrastructure delivery between the State government, the City of Sydney, infrastructure providers, land developers and the community.

Recommendation 18:

A greater understanding of utility and civil costs for development, particularly at Blackwattle Bay, will be required to inform Infrastructure Delivery Plan.

Liveability

Recommendation 19:

The Peninsula Amenity Character and Amenity Based Height Strategy that informs the sub-precinct master planning should be developed by the City of Sydney on the following principles:

- maximum heights should be located close to ridgelines with building heights stepping down to the three harbour edges
- heights should knit in (transition) to existing established height context that is unlikely to change
- manage wind effects at edges of the Peninsula by appropriate massing rather than screens or awnings
- promote daylight into streets
- maintain human scale in streets
- promote private view sharing but guarantee protection of important and defined public views
- protect areas of significant heritage or urban quality, such as Heritage Conservation Areas, Union Square and the length of Harris Street where heights may be reduced to match heritage items or patterns of form in the street
- protect sunlight to important parks and public open spaces by limiting height of development in their vicinity

Recommendation 20:

The Peninsula Character and Amenity Based Height Strategy must be worked through in detail the City as lead and incorporated into the sub-precinct master planning.

Recommendation 21:

That Place Strategy adopt an amended Pyrmont Peninsula Review of Affordable Housing Policy, including the adoption of affordable housing targets for government and non-government owned sites.

Recommendation 22:

Existing social housing within the Peninsula should be retained and increased. Existing social housing sites on the peninsula should not be redeveloped. If any sites are redeveloped, the number and quality of social housing dwellings should significantly increase in line with the City's target, and appropriate infrastructure and services provided to support tenants.

Recommendation 23:

Aboriginal and Torres Strait Islander consultation, culture and values must inform the final Place Strategy and sub-precinct masterplans. The consultation will need to take into account the NSW Government Architect's Designing with Country discussion paper, with Indigenous Cultural and Intellectual Property rights are respected.

Recommendation 24:

Gender inclusive design should be a consideration in development of the final Place Strategy aligning with the NSW Greater Sydney Commission's Women's Safety Charter.

Productivity

Recommendation 25:

The Economic Development Strategy and Place Strategy should include employment, industry mix and productivity targets for the Peninsula based on target industries. It should also take into account the after effects of the Covid health pandemic and changing space requirements and work practices that may evolve.

Recommendation 26:

The Economic Development Strategy should target industries around building typology, precinct or floor space requirements and inform future planning. Campus floor plates are superior to point towers on local character and work place grounds.

Recommendation 27:

A retail strategy should be developed to provide adequate and diversity of offering to suit the new 24-hour economy. A mix of suitable retail spaces including the opportunity to showcase for innovation, co-working and demonstration labs need to be considered as part of the mix.

Recommendation 28:

The Economic Development Strategy should be expanded to address advanced, clean and hi-tech manufacturing as a key industry and its role in the Innovation Corridor ecosystem.

Recommendation 29:

The Economic Development Strategy and the Place Strategy should include clear aspirational affordable enterprise floor space targets.

Recommendation 30:

The next stage of the Place Strategy should explore more innovative ways to plan for a target of more affordable work/ enterprise space including a system based on SEPP 70 – Affordable Housing.

Recommendation 31:

Ensure the delivery of space for economic uses and the Premier's vision that Pyrmont is 'open for business' by amending relevant sub-precinct priorities to match action 24 (b) of the Eastern City District Plan.

Sustainability

Recommendation 32:

The Place Strategy should commit to four pillars and performance criteria outlined in the Pyrmont Peninsula Sustainability Framework Scoping Report by incorporating them as targets in the Place Strategy to ensure that development by 2041 the Peninsula will:

- produce net-zero greenhouse gas emissions
- generate 25 megawatts of power via local solar photovoltaics on high-performance buildings
- store 100 megawatt hours of power in local battery storage in high-performance buildings
- have accommodated no or low new private parking in residential developments

- generate 10 megalitres of recycled water through high-performance buildings for irrigation and non-potable uses
- accommodate 2 hectares of distributed new active public space through the strategic removal of resident on-street parking
- accommodate 25% canopy cover across the Peninsula delivered through green streets

Governance and implementation

Recommendation 33:

Draft sub-precinct master planning and the Infrastructure Delivery Plan must be exhibited with sufficient time for public comments before they are finalised.

Introduction

The draft Pyrmont Peninsula Place Strategy is predicated on the delivery of a new metro station in Pyrmont as part of the Sydney Metro West project. If the decision of Government is to not to proceed with Pyrmont metro, then the City of Sydney reserves the right to fundamentally change this submission.

The draft Strategy envisages that over the next 20 years, from 2021 until 2041, the Peninsula's residential population will increase by a maximum of 8,500 residents and the daily worker population will increase to a maximum of 23,000 workers.

To reiterate, this kind of growth is not possible without a commitment from the NSW Government to construct a metro station as part of Sydney Metro West in Pyrmont by 2028.

The majority of this growth is focused in four identified sub-precincts of Ultimo, Blackwattle Bay, Tumbalong Park and Darling Island (see Figure 1), largely confined to four State Significant 'Key Sites' at UTS, the current Sydney Fish Market, Harbourside Shopping Centre and around Star Casino.

The draft Place Strategy aims to set out a planned and logical set of directions, planning responses, infrastructure and governance opportunities to guide the next wave of investment in the Peninsula so as to harness public benefits while enabling investor certainty.

It communicates this through the following elements:

- 10 Directions
- Five Big Moves
- A Structure Plan
- Seven sub-precincts, and
- Four Key Sites.

Future land use plans and development proposals, both strategic and statutory, is anticipated to respond to the final Place Strategy. Getting the Place Strategy right is of the upmost importance as it will be the document to which all future proposals within the peninsula will be measured.

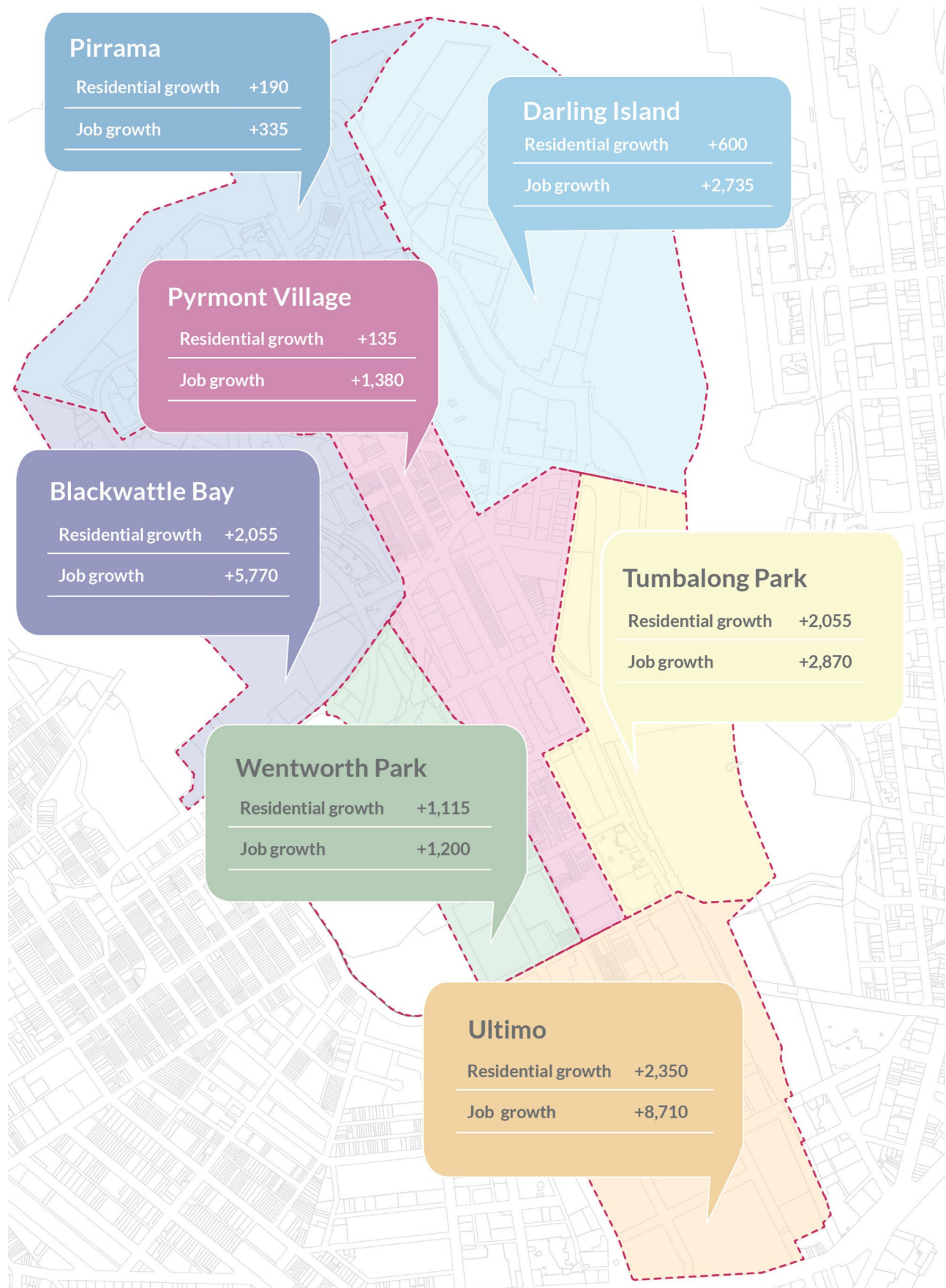
The City has already provided feedback on the 10 Directions, so that will not be the focus of this submission. The focus will be on the remaining elements of the draft Place Strategy at a high level, then a focus on how the future development of the Place Strategy should better align with the Infrastructure, Liveability, Productivity, Sustainability, Governance and Implementation priorities of the Eastern City District Plan and the City's Local Strategic Planning Statement, City Plan 2036.

The next steps in the development of the Place Strategy are understood to involve the development of sub-precinct masterplans, an Infrastructure Delivery Plan, potentially a state significant planning treatment for the 'Key Sites', a program of local planning amendments as well as refinement of the Place Strategy itself.

The City does not agree with the ongoing special treatment of State Significant Sites and requests that all land be unified into the Sydney LEP and the setting of development standards consistent with an amended strategy be undertaken by the City.

Figure 1. Forecast residential and jobs growth by sub-precinct

Reproduced from Pyrmont Peninsula Demographics Profile, Figure 15



The Five Big Moves

The City generally supports the Five Big Moves. However, overall, not enough commitment or detail is provided. Six of the ten actions associated with the Five Big Moves are 'investigate' actions and whilst it is acknowledged that additional certainty around the actions will come as the Place Strategy is developed, the community should be provided certainty now as to the public benefits being committed to, aligned with the growth being outlined.

This issue is further emphasised as the draft Place Strategy suggests that for so-called 'Key Sites' to progress in the future, they will need to contribute to the realisation of a Big Move.

Big Move 1 - Build and link a world class foreshore

The restoration/refurbishment and upgrade of the Glebe Island Bridge as an active transport (and public transport) link should be committed to as an extension to the identified foreshore walk with a nominal dimension of 30 metres also committed to for all new sections of the foreshore walk.

Big Move 2 - Enhance the opportunity to provide a vibrant 24-hour cultural and entertainment destination, with small bars, performance spaces, museums and other entertainment

'Key sites' like Blackwattle Bay, Powerhouse/MAAS, the Star, Harbourside and UTS provide clear opportunities for the Place Strategy to incentivise the requirement for cultural, performance, rehearsal and creative spaces. The Place Strategy should include an ambitious target for cultural and creative floor space growth and extend beyond entertainment and performance uses to space for cultural production, rehearsal and making.

Big Move 3 - Realise the benefits of a new Metro station by making Pyrmont a destination, rather than the point where journeys start

The commitment here to "Build a Sydney Metro station in the Pyrmont Peninsula as an anchor for new development and connectivity" is welcomed. The commitment should extend to the public domain renewal and entrance locations that will be required around any station which will be critical to support associated uplift.

Big Move 4 - Create a low carbon and high-performance precinct, maintaining the shift to a place where people walk and use public transport to connect to other places

This Big Move is very limited in its application with only a commitment to investigate the delivery of multi-utility hubs. The Big Move should be extended to commit that by 2041 the Peninsula will:

- produce net-zero greenhouse gas emissions
- generate 25 megawatts of power via local solar photovoltaics on though high-performance buildings
- store 100 megawatt hours of power in local battery storage in high-performance buildings
- have accommodated no new private parking in new residential developments
- generate 10 megalitres of recycled water through high-performance buildings for irrigation and non-potable uses
- accommodate 2 hectares of distributed new active public space through the strategic removal of resident on-street parking
- accommodate 25% canopy cover across the Peninsula delivered through green streets and removal of the Western Distributor.

Big Move 5 - More, better and activated public spaces across the Peninsula

The return of Wentworth Park to the community as public open space must be funded and committed to by government.

Wentworth Park is currently disconnected by the Wentworth Park Greyhound Race Track. The City strongly supports return of the track area to the public when the lease to the Greyhound Breeders Owners and Trainers Association expires in 2027.

The Structure Plan

Similar to the Big Moves, more detail is required. The Structure Plan should be developed through the next stage of sub-precinct development with more clarity in both the key and the plan itself as to its implication for individual land owners and the Peninsula.

The seven sub-precincts

The Peninsula is broken up into a number of sub-precincts with each supported by place priorities.

The place priorities provide the clearest direction as to the Department of Planning, Industry and Environment's intentions for each precinct. The place priorities will inform the next stage of sub-precinct master plan development and future proposals across the Peninsula which should be undertaken by the City.

The sub-precinct master plans will provide the necessary detail to inform updates to planning controls in areas where growth is expected under the Place Strategy.

The City should lead the development of the sub-precinct master plans over the coming months. Any suggested height and floorspace changes must be reviewed and tested prior to being recommended in draft form. The following is provided as general feedback on the place priorities that should be revisited.

- The place priorities should be stronger in their reference to Planning Priority E7 of the Eastern City District Plan. Whilst an employment focus is taken, permitting 'limited residential development without compromising the sub-precinct's tourism, entertainment and commercial functions' is not the same as permitting limited 'residential development without compromising commercial development' as stated in the District Plan.

For Blackwattle Bay in particular, ensuring 'any residential development does not compromise the quality and attractiveness of Blackwattle Bay as a place for commercial or entertainment uses' is an inadequate measure and inconsistent with Planning Priority E7.

- The protection of public views to and from the water is supported and should be further investigated as part of the master plan process so as to inform updates to planning changes.

It is not clear from the Urban Design Strategic Framework if the Martin Place view corridor proposed under the Central Sydney Planning Strategy has been addressed. It should be included in the planning priorities.

- Planning priorities related to building height transition should refer to protecting solar access to public parks and places, as well as wind and daylight conditions in streets. Parks and places to be provided solar protection must be workshopped to determine their physical extent of their protection and time of year and day.

State Significant 'Key Sites'

The draft Place Strategy identifies four sub-precincts (Ultimo, Blackwattle Bay, Darling Island and Tumbalong Park) expected to experience the greatest growth and change over the next 20 years.

Within these four sub-precincts the draft Place Strategy identifies four 'Key Sites' that are considered to have the potential to deliver strategic change in the peninsula combined with broader public benefits, such as connecting and activating the public domain or contributing to the delivery

of a Big Move under the draft Place Strategy. The four 'Key Sites' are Blackwattle Bay, The Star Casino, Harbourside Shopping Centre and UTS.

The draft Place Strategy outlines an intention to set out a clear approach to enable the integration of landowner and proponent aspirations with the peninsula-wide vision, 10 Directions, Big Moves and sub-precinct place priorities. The City requests that the 'Key Sites' in question should not be treated as state significant. The City reiterates its continued request for all planning within the Peninsula to be unified in the Sydney LEP. Certainly, when 'Key Sites' are considered post exhibition, the City would seek to retain plan making and consent authority powers for these and any other sites.

Given the size and scale of the Blackwattle Bay site the following detailed comments are provided:

Blackwattle Bay

- Infrastructure NSW must change and align the land use and the built form outcomes of the master plan scenario for Blackwattle Bay with the finalisation of the Pyrmont Peninsula Place Strategy and sub-precinct master plan.
- Blackwattle Bay should be a diverse mix of work space to accommodate jobs in strategically important knowledge-based industries to build on and expand existing and future industry clusters. This could be supplemented with residential, retail, cultural, and visitor uses in a supporting capacity.
- Sub-precinct master planning should consider the following when establishing maximum building heights and form:
 - The established character of the place.
 - The site has significant exposure to strong westerly winds. The impacts of wind on the comfort and amenity of the streets, parks and plaza should be a determining factor in buildings height and form across the site with wind standards to accommodate sitting.
 - Building heights should seek to limit overshadowing of the Glebe foreshore at all times. The foreshore walk is heavily used all year round before 9am.
 - Air pollution and noise from the ANZAC Bridge approach (caused by traffic type, volume and speed).
 - Incentivising buildings suited to the needs and preferences of the target businesses and occupants for the commercial buildings.
 - No additional overshadowing of Wentworth Park or external areas at the Fish Markets between 9am and 3pm.
- For the foreshore walk:
 - The width of the walk must be welcoming and be wide enough for pedestrians, visitors, workers and residents who will make use of the foreshore access including tree planting for shade, rest spots, seating and picnicking locations. Any plan must cater for the expected very large numbers of people in 2050 who will be using the walk.
 - The walk must be able to safely accommodate pedestrians and recreational cyclists whilst being accessible to all users. An implication that recreational cyclists will be banned from the walk would be unworkable and is not supported.
 - The placement of outdoor dining and similar encroachments on the walk must not constrain its overall capacity and safety.
 - Consideration be given to any impacts that future predicted sea level rise will have on the accessibility of the walk, noting the NSW Sea Level Rise Policy Statement (DECCW, 2009) sets Sea Level Rise planning benchmarks of 0.4m by 2050 and 0.9m by 2100 (relative to 1990 mean sea levels).

Infrastructure

The draft Place Strategy identifies the growth potential of the Pyrmont Peninsula and explores scenarios for its long-term future. It is upfront about the range of infrastructure and services needed to support the additional worker, visitor and residential populations.

Figures 1, 2 and 3 list the minimum community, cultural, open space, recreation and transport infrastructure required to support the Peninsula's appropriate redevelopment by 2041.

It is understood that these lists are based on initial benchmarking alone and that the exhibition process will draw out community views around demand for new and improved infrastructure. Government agencies, including the City, will also provide feedback on infrastructure assets, planned upgrades or opportunities not captured by the draft Place Strategy.

Community and government agency feedback on infrastructure should be incorporated into the next stage of Infrastructure Delivery Plan development. This should be done in a transparent way, so community and government can appreciate how minimum community infrastructure requirements have been refined.

It is understood that the next stage of Infrastructure Delivery Plan development includes refining the minimum community infrastructure lists, estimating costs, determining delivery timeframes, responsibilities and a pathway for implementation. The final Infrastructure Delivery Plan will:

- assist infrastructure agencies and the community in understanding the 'infrastructure task' needed to support the creation of great places in the Place Strategy area
- set out what infrastructure is needed, what infrastructure will be delivered, who will deliver the infrastructure, and what mechanisms will be used to deliver the infrastructure
- identify the potential for individual developments to incorporate infrastructure needed by residents, workers and visitors in the Place Strategy study area
- assign priorities and develop an indicative staging schedule for delivery of the infrastructure
- provide a 'road map' that will assist agencies to collaboratively plan, prioritise, program and deliver infrastructure in the Place Strategy study area in an orderly and timely manner.

The City should be actively involved throughout the next stage of Infrastructure Delivery Plan development, with views expressed in this submission considered a starting point for a conversation around the minimum community infrastructure required, infrastructure priorities, delivery timeframes, responsibilities and mechanisms for implementation.

The final Place Strategy and the Infrastructure Delivery Plan could be accompanied by a Ministerial Direction requiring any growth to be aligned with infrastructure delivery and form part of a Place-based Infrastructure Compact for the Peninsula. This will enable infrastructure projects to be committed to through NSW Budget, NSW State Government agency and City asset management strategies and capital works programs. This will provide certainty to the community that as the city grows infrastructure is provided in the right place at the right time.

Figure 2. Required community and cultural facilities by 2041

Reproduced and adapted from Social Infrastructure Assessment, Table 30

Community infrastructure required	Location	Responsibility
400sqm community venue hire	Blackwattle Bay	Developer
Communal rooms for community activities as part of future residential development	Future major renewal site	Developer
Up to 3,000sqm of new library floor space through either a new library facility or Wi-Fi ready lounge /foyer space in commercial buildings	Blackwattle Bay/Pyrmont	State/Local
Encourage work-based childcare as part of any future large commercial development	Blackwattle Bay/Ultimo	Private sector
Affordable and quality medical centre	Blackwattle Bay	State
Ground level cultural spaces for participation/exhibition as part of new private development	All	State/Local/private
Refurbish and enhance public access to existing auditoriums/lecture theatres within the Powerhouse Museum to allow local performances and theatre rehearsals	Ultimo/Powerhouse	State
Creative live/work spaces within new residential development	All	Developer
New production and rehearsal space to support local production or creative and performing arts	Powerhouse/MAAS/Fish markets warehouses	State/private

Community and cultural facilities

The Social Infrastructure Assessment, July 2020, prepared by Cred Consulting provides a solid foundation for the development of the Infrastructure Delivery Plan. In developing the Infrastructure Delivery Plan, the working group should note the following:

- The City supports further investigation into innovative and partnership approaches to the delivery of required local and regional community and cultural infrastructure e.g. around partnership funding and finance models. This is integral to the future viability of community and cultural infrastructure.
- Community and cultural infrastructure that supports temporal and transient populations are not necessarily captured within future population projections. These cohorts should be considered in further detail as they will impact on the types of infrastructure needed to support the wider community. For instance, shift workers and the type of childcare provision they require.

- There needs to be more work done to understand the opportunities and constraints of existing facilities and prioritisation of investment into existing facilities as part of Infrastructure Delivery Plan development, not just the creation of new spaces.
- The Assessment refers to a community arts facility like Pine Street Creative Arts centre which is run by the City. A more sustainable management model that would address current needs is East Sydney Community Arts Centre which co-locates creative studios, community participation and flexible rehearsal/performance spaces.
- The Assessment clearly articulates the need for local cultural infrastructure that facilitates community participation and more importantly provides access to affordable and managed creative spaces, small scale performance/rehearsal and cultural production facilities. Any opportunities to meet this identified demand at the MAAS are strongly supported by the City. The Powerhouse Museum is strategically positioned to benefit from and contribute to the precinct with adaptive reuse of its increasingly rare industrial heritage buildings for creative spaces and cultural production facilities for the small to medium sector.
- Investment to increase capacity for cultural production studios within or close to cultural tourism destinations such as the Fish markets site would be very appropriate to increase cultural and economic exchange for local creatives and visitors alike. Artists can diversify their income streams with opportunities to host community classes and workshops, showcase their work, share skills and resources through open studios and maker spaces.
- Accessibility should not just focus on the physical accessibility of spaces but the affordability of services too. For instance, the City supports assertions relating to needs of aging population and health service requirements. However, any future health provision within local area needs to ensure it is accessible and affordable (bulk billed).
- The City does not support the delivery of a new community venue for hire at Blackwattle Bay. Given its geographical setting, poor physical connections to surrounding communities and the number of venues for hire in the surrounding areas, this would not be the optimum type of social infrastructure that could be provided. Investment to increase capacity and use at existing facilities would be more appropriate.

Figure 3. Required open space and recreation facilities by 2041

Reproduced and adapted from Social Infrastructure Assessment, Table 30

Community infrastructure required	Location	Responsibility
<p>New district park at Bank Street Blackwattle Bay of at least 2ha including the following:</p> <ul style="list-style-type: none"> - 4 multi-purpose courts - regional inclusive play space (including water play) - public boating facilities [launch points and storage (e.g. shared kayaks/canoes)] - formalisation of dragon boat storage 	Blackwattle Bay	State
Active transport loop that wraps around the Peninsula inclusive of a connected foreshore walk	All	State/Local
Restoration/refurbishment of Glebe Island Bridge to serve as a linear park and walking/cycling link	Blackwattle Bay	State
Closure of Jones Street between Broadway and Mary Ann Street and creation of a new linear park	Ultimo	State/Local

Community infrastructure required	Location	Responsibility
Mary Ann Street park upgrade to support students and residents. Upgrade to include seating, tables and Wi-Fi to facilitate group outdoor study and play equipment suitable for both adults and children	Ultimo	Local
Integration of youth spaces along Ultimo portion of active transport loop. This includes seating, tables and Wi-Fi to facilitate group outdoor study and play equipment suitable for both adults and children	Ultimo/ Tumbalong Park	Local/State
Expansion of intersection area at end of current Goods Line (beginning of Powerhouse) potential inclusion of half court/multi-purpose court	Ultimo	Local/State
Transform the retained areas under Western Distributor between Pyrmont Bridge Road and Allen Street for community uses including potential skate area	Blackwattle Bay/Ultimo/ Pyrmont	State/Local
New urban park/plaza connecting Allen Street/convention centre light rail/access to waterfront past convention centre and ICC hotel, both increasing % of open space in the area and enhancing links between Ultimo and Darling Harbour	Tumbalong Park	Developer
Expand Carmichael park by disconnecting Quarry Master Drive, potential additional expansion through renewal of adjoining apartment buildings and dedication of open space	Pirrama	Developer
Address significant need for increased play opportunities through incorporation of playful elements (e.g. climbing elements, sensory games, playful public art, pavement treatment to encourage jumping etc.) along the active transport loop of Jones, Banks, Bowman, Pirrama, Murray, Pyrmont Streets and the Goods Line	All	Developer/State/Local
Incorporate at least 1 new outdoor fitness station along active transport loop to support workers	Darling Island/Black wattle Bay	Developer/State/Local
At least 2 x public indoor courts provided as part of future development to support workers	Darling Island	Developer
At least 4 x public outdoor courts to support students and young people living in Ultimo	Ultimo	Developer/UTS
The return of Wentworth Park greyhound track land as newly activated, publicly accessible open space as part of a larger and enhanced parkland once their terms expire	Wentworth Park	Local/State
New synthetic field at Wentworth Park to support increased capacity and use for both informal and formal sport	Wentworth Park	Local

Community infrastructure required	Location	Responsibility
Harbour pool at Blackwattle Bay (can be temporary during Summer Use)	Blackwattle Bay	State/Local

Open space and recreation facilities

The Place Strategy outlines a range of public domain opportunities which are consistent with City policies, such as an increased planting and canopy cover, improved pedestrian amenity and permeability, upgraded public open spaces, improved access to public transport and active transport networks, including temporary Covid-19 measures. Such improvements are supported in principle and are considered essential to support the increased development intensity anticipated. Many are basic requirements that should be delivered as part of any redevelopment.

Public benefit opportunities suggested in the Place Strategy and supported by the City include:

- Removal of greyhound track and expansion of Wentworth Park as public green open space, to include active recreation and sports field. The Place Strategy currently proposes to 'investigate' this move, where it should be a requirement. Funding mechanism across the Strategy in terms of demolition of structures, remediation, master planning and park upgrade capital works need investigation and planning.
- New metro station, entrances and surrounding public domain renewal. This is critical to support development uplift and requires government commitment prior to uplift.
- Completion of the foreshore walk. The City is currently working on implementing a harbour walk, a 9-kilometre walk extending from the Australian National Museum in Darling Harbour to Woolloomooloo Bay. Developed with Aboriginal curator Emily McDaniel and in partnership with the Place Management NSW and representatives from Sydney's Aboriginal and Torres Strait Islander communities, the walk will have a Sydney Aboriginal name and icon that embodies the significance of the harbour and foreshore. The Harbour Walk will inspire the public to experience the harbour foreshore in a way that is not currently available through a series of projects to include public artworks, wayfinding and interpretive signage that tell the stories of Sydney's Aboriginal people. The ambition to create a continuous 'World Class Foreshore Walk' as part of the structure plan is supported, and the City would welcome opportunities to extend the Harbour Walk to Pyrmont Peninsula. The foreshore should have high pedestrian amenity and be comfortable for dwelling and recreation with good sun access and protected from any adverse wind impacts of proposed taller building clusters.
- Enclosing/building over the existing light rail cuttings to create new public space and improve pedestrian connections.

Some of the opportunities in the Place Strategy are described in great detail and perhaps are overly prescriptive and limiting for a strategic document such as this. An example is the requirement of many of the local parks to include sensory gardens and specific climbing/play equipment. The upgrade of parks should occur through a process of community consultation and analysis of needs/opportunities prior to commencing any design proposal. The community should then be given the opportunity to view and comment on proposed schemes, as per usual City practice.

Any proposal for public domain upgrade needs to address existing City plans and policies, in particular the City South/Chinatown Public Domain Plan. This plan relates to the southern end of the study area and identifies the following opportunities which should be reflected in upgrade proposals:

- Hay Street provides a key connection from the Central/Chinatown to the Pyrmont Peninsula via the Goods Line to MacArthur Street. Any redevelopment of the Powerhouse site should include a publicly accessible continuation of this connection.
- There is currently very little footpath on Mary Ann Street. Considerations should be given to improving the interface between the Powerhouse, the Goods Line and the Dr Chau Chak Wing Building.

Figure 4. Transport interventions by 2041

Reproduced and adapted from Infrastructure Delivery Opportunities Study, Table B1

Community infrastructure required	Location	Responsibility
Reallocate road space on Wattle St south of Fig St	Ultimo/Wentworth Park	State
Contra-flow bus lane northbound on Harris St and Regent St (Thomas St and Lee St)	Ultimo	State
Removal of the Pyrmont Street ramp to Western Distributor	Tumbalong Park	State
Convert local streets around UTS and TAFE Ultimo to shared zones between Wattle and Harris St and Broadway and Mary Ann St	Ultimo	Local
Closure of Jones St between Thomas St and Broadway to create open space	Ultimo	Local
New signalised pedestrian crossing on Harris St between Thomas St and Broadway	Ultimo	Local
A bus route to the Parramatta Rd corridor through Glebe and Forrest Lodge along Bridge Rd and Pyrmont Bridge Rd	Blackwattle Bay/ Pyrmont/Darling Island	State
A new intermediate transit corridor connecting the Bays precinct to Redfern and ATP through Pyrmont via Harris St	Pirrama/Pyrmont/Ultimo	State
Rationalisation and relocation of bus stops along Harris St to improve bus travel time reliability	Pirrama/Pyrmont/Ultimo	State
Increase light rail frequency along Inner West light rail during peak period to increase peak capacity during weekdays and frequencies during weekends and public holidays	Wentworth Park/Blackwattle Bay/Pirrama/ Darling Island/Tumbalong Park	State
New ferry wharf at Cadi Bay to provide all-weather shelter for ferry passengers	Pirrama	State
Extend Goods Line south through existing tunnel to Central Station and further to Redfern Station	Ultimo	State

Community infrastructure required	Location	Responsibility
Extend Goods Line north to Pyrmont St and Murray St to connect with existing Union Square cycleway; this would require integration into key sites including Powerhouse and Novotel sites	Tumbalong Park/Pyrmont	State
Extend Jones St cycleway north to Pyrmont Bridge Rd	Blackwattle Bay	Local/State
Active transport crossing of Pyrmont Bridge Rd to provide connection to Jones St		
Extend Union St cycleway along Miller St, Bank St and connecting with Glebe Island Bridge as a separated off-road path	Pyrmont/Blackwattle Bay	Local/State
New commuter cycleway through Blackwattle Bay connecting Bridge Rd (around Wattle St) to Miller St	Pyrmont/Blackwattle Bay	Local/State
Extend foreshore active transport link through Blackwattle Bay and Sydney Fish Market redevelopment to complete recreational foreshore link to Wentworth Park	Blackwattle Bay/Wentworth Park	Local/State
Underground active transport link to Sydney Fish Market from existing Fish Market light rail stop	Blackwattle Bay	State
Glebe Island Bridge link to provide active transport and public transport connection from Pyrmont to The Bays precinct	Pirrama	State
Localised widening of footpaths along key streets including Harris St, Wattle St and Pyrmont St	Pyrmont/Wentworth Park/Ultimo	Local/State
Pursue shared parking across different land uses with a view to re-purposing this space over time as parking demand decreases	All	Local/State
Parking pricing with efficient prices that include lower rates during off-peak periods and higher rates during peak times and locations. This includes the potential for variable pricing during congested times	All	Local/State
Transportation management associations for new developments to establish member-controlled organisations that provide transport and parking management services	All	Local/State/developer
Alternative freight arrangements for consolidating last mile delivery into centres such as logistic hubs	All	Local/State
More car-sharing and ride-sharing	All	Local
Prepare for autonomous vehicles through flexible planning controls that can accommodate reduced or	All-	Local/State

Community infrastructure required	Location	Responsibility
modified parking better suited to serving private vehicle travel demand through mobility as a service instead of personal ownership		
New Sydney Metro West station at Pyrmont, located in the northern part of the Peninsula	Pyrmont/Darling Island/Blackwattle Bay	State

Transport interventions

- An active transport link to the Sydney Fish Markets from the existing fish markets light rail stop, should be at-grade, not underground. A good quality at-grade crossing is more appropriate in this location.
- Wattle, Harris and Regent streets should be investigated for two-way operation. This ensure a better place outcome as it increases accessibility and reduces traffic-speed.
- The Transport Strategy should include an initiative to reduce or eliminate the Western Distributor. Closure and modification of all the ramp and access to and from the Western Distributor should be included in the transport interventions list, including but not limited to removal of the Pyrmont Street ramp, the Allen Street off ramp, the Harris Street off-ramp from Western Distributor at Fig Street, and the right turn from Western Distributor (west) to Pyrmont Bridge Road (south). The removal of these ramp connections will play a major role in reducing through traffic in Pyrmont and enabling street space to be returned to people and place. One specific example would be the boost that would be given by closing the Allen Street ramp. This would remove the severance of Bulwara Road and the western edge of the Peninsula.
- Reconfiguration of road capacity to reduce traffic capacity and provide more capacity for other travel modes should be committed to on Pyrmont Bridge Road (reduction in travel lanes between Wattle Street and Darling Drive) and Pyrmont Street (reduction in travel lanes between William Henry Street and Murray Street).
- Variable parking pricing is discussed in the Transport Strategy with a higher price at “congested periods”. The focus is on off-peak rates. This should include people peak periods not just traffic peak periods. Seeing if pricing can discourage use during lunch time or early evening periods and other times when more people are walking on the streets.
- The Transport Strategy recommends lower parking rates to cover new development, however this does not form part of the transport interventions, which it should.
- All future modelling should be in line with Future Transport directions to ensure the modelling is used to validate initiatives rather than dictating what the model believes the traffic capacity needs to be and providing for it. Vision and validate rather than predict and provide.
- Some streets in the area are considered as B-Doubled routes for regional freight transport. The Transport Strategy should consider this aspect and count its impact.
- The Transport Strategy talks about local freight and alternative freight arrangements as an initiative. This initiative is key to unlocking the road space reallocation results. The wording of this initiative should be stronger than just investigate to ensure it happens. The Place Strategy should focus on reducing freight traffic through the Peninsula.
- The Transport Strategy includes a number of detailed cycling initiatives consistent with existing City and State cycle planning. The walking initiatives are much less clear and conclusive. An initiative such as investigating maximum distances between pedestrian crossing points could be considered to give the strategy a stronger focus, or an initiative on road space reallocation

targets. This should include an investigation of pedestrian connections across Darling Harbour with existing connections along the Western Distributor from Fig Street being poor.

Mechanisms for implementation

Growth beyond City Plan 2036

The Place Strategy represents additional growth beyond the capacity in City Plan 2036. As such, the infrastructure needs of this project have not been planned through the City's contribution and capital works plans and the City does not have the resources to fund this growth.

Development contributions alone will not be capable of fully funding infrastructure demand. It is unreasonable that these infrastructure needs be imposed on existing communities or the City.

Innovative funding and delivery mechanisms, including partnership approaches and the delivery of infrastructure on 'Key Sites' will be required. As a principle, developments initiated by the Place Strategy will be responsible for delivering the additional infrastructure required to support the community within their projects.

Infrastructure Delivery Plan development and collaboration

As the City will be responsible for delivering and maintaining a large proportion of the required infrastructure in the Place Strategy area, the City should be heavily involved in the next stage of Infrastructure Delivery Plan development. This should include:

- the testing of both planning system and other mechanisms to match infrastructure items and categories so that a sustainable funding mix can be applied to provide and maintain infrastructure over its life cycle
- prioritisation of infrastructure and allocation of funding based on likely timing of key site development and then forecast development throughout other parts of the Peninsula to ensure delivery
- scenario testing to assess income that could potentially be generated under different funding approaches, for example, section 7.11, section 7.12 developer contributions, and
- detailed analysis of potential value uplift on each development site to assess the potential for development to deliver infrastructure and other place outcomes, either on-site or through a broader incentive floor space contributions scheme or other mechanism.

The City agrees that effective planning, funding and delivery of the infrastructure required to support the Place Strategy can only occur with effective governance and decision-making. This will require the establishment of a working group and effective governance framework for coordinated infrastructure delivery between the State government, the City of Sydney and others.

Utilities and other civil infrastructure works

The Pyrmont Peninsula Utilities Infrastructure Assessment is noted. The assessment addresses water, sewer, electricity, gas and telecommunications infrastructure supply and demand and generally notes that augmentations or additional infrastructure will be required to support growth.

A greater understanding of these and other civil costs for accommodating growth, particularly at Blackwattle Bay, are required to appropriately inform Infrastructure Delivery Plan development.

Liveability

Reinforcing Peninsula scale and character

The Urban Design Strategic Framework, July 2020, prepared by Hassell states:

“The unique character of the Peninsula is best appreciated from the harbour, where there is a layering of water, landform and landscape, industrial waterfront, heritage structures and newer mixed-use buildings. A stepping down of building heights from the topographic high points within the peninsula to the harbour edge protects this layered character, which is a key differentiator of the place and an attractor of workers and residents alike.”

This statement is a narrow interpretation of the Peninsula’s harbour setting and may seek to justify additional height is achieved at the Blackwattle Bay and Tumblong Park sub-precincts.

The Pyrmont Peninsula is predominantly a single ridge promontory with three significant harbour edges. Central Sydney as a comparison is a dual ridge promontory with two harbour edges and a park edge. Central Sydney also has a much longer history of development, redevelopment and accommodating tall buildings.

To appropriately reinforce the Peninsula’s true scale and character, sub-precinct master planning for the Peninsula should be based on the following principles:

- heights should be located close to ridgelines with building heights stepping down to the three harbour edges
- heights should knit in with existing established height context that is unlikely to change
- manage wind effects at edges of the Peninsula
- promote daylight into streets
- maintain human scale in streets
- promote private view sharing but guarantee protection of important public views
- protect areas of significant heritage or urban quality, such as Heritage Conservation Areas, Union Square and the length of Harris Street where heights may be reduced to match heritage items or patterns of form in the street
- protect sunlight to important parks and public open spaces by limiting height of development
- observe limits set by Civil Aviation Authority.

Protecting amenity of streets and spaces

The Urban Design Strategic Framework states:

“The Peninsula has a strong urban identity, with a network of characterful streets and spaces. As the population grows, the accessibility and amenity of these places becomes even more important. Solar access planes are applied to new buildings to protect sunlight into the peninsula’s parks, plazas and main streets - an extension of the approach used by the City of Sydney within Central Sydney.”

The City supports this statement, but insufficient detail has been provided as to what parks and places are being protected, their physical extent and their time of day. Depending on the park or place, the extent of its protection should include surrounding streets and its protection should include early morning, midday or late afternoon, depending on its use. The Peninsula Character Height Strategy and Amenity Based Height Strategy must be worked through in detail by the City and incorporated into the sub-precinct master planning.

Affordable Housing

The City supports the recommendations of the Review of Affordable Housing Policy, June 2020, prepared by Atlas Urban Economics including the following consideration which should be addressed when developing an affordable housing policy for the Peninsula:

1. Rationalisation of the Revised City West Program with the City of Sydney Affordable Housing Review

The Revised City West Program should be rationalised with the City of Sydney's Affordable Housing Review under the new affordable housing program which covers the entire Sydney LGA. This presents an opportunity to review and update the existing contribution rates applicable in the Peninsula to align with current market dynamics.

This may streamline administration of affordable housing contributions which are currently received and distributed by the Department of Planning, Industry and Environment.

2. Adoption of the incentive-based mechanism recommended in the City of Sydney Affordable Housing Review

The incentive-based mechanism outlined in the City of Sydney Affordable Housing Review requires a contribution of 12% of additional residential floor space for planning proposals across the peninsula and would support affordable housing outcomes across the Peninsula.

3. Adoption of an affordable housing target for government owned sites (other than LAHC sites)

An affordable housing target for any redevelopment of government owned-sites across the peninsula for residential and/or mixed-use purposes should be adopted. The 25% target (in addition to any social housing) proposed in the City's Local Housing Strategy could be tested against various agency-owned sites in the peninsula to identify viability thresholds.

4. New affordable housing target

A new target for affordable housing should be adopted following adoption of any new affordable housing policies and actions in the peninsula.

5. Investigate opportunities within the Peninsula in conjunction with sub-precinct master planning.

Review and test opportunities (generally and site-specifically) for affordable and social housing in the peninsula as sub-precinct master planning is undertaken to uncover areas for focus.

Social Housing

The City supports the retention of existing social housing within the Peninsula. Where additional sites are redeveloped, the number and quality of social housing dwellings should increase, and appropriate infrastructure and services provided to support residents.

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Designing with Country

The Pyrmont Peninsula Place Strategy Indigenous Cultural Heritage Report, July 2020, prepared by Kelleher Nightingale Consulting, provides good initial archaeological and desktop analysis of the areas potential archaeological, cultural and heritage significance. At this stage, it lacks qualitative assessment and direct consultation with the Aboriginal and Torres Strait Islander community.

The Report acknowledges this and sets out actions for the next stage of and Place Strategy development, including:

- a comprehensive process of Aboriginal and Torres Strait Islander community consultation
- a full cultural assessment
- the addition of any areas of cultural sensitivity identified through further assessment to the heritage sensitivity mapping, and
- the development and refinement of key recommendations resulting from further consultation and assessment.

Whilst it is the City's strong preference that this qualitative work was completed to inform the draft Place Strategy, it is acknowledge that Covid-19 restrictions and the tight timeline for the project have made this difficult. Because the draft Place Strategy was not informed by Aboriginal and Torres Strait Islander consultation, it is critical that future consultation adds real value to the Place Strategy. It should not be an exercise in attaching Aboriginal and Torres Strait Islander culture and values to a pre-determined Place Strategy.

Aboriginal and Torres Strait Islander consultation should shape the Place Strategy with tangible outcomes beyond place naming and public art projects. Other outcomes might be affordable housing or affordable employment and creative space for Aboriginal and Torres Strait Islander communities, cultural heritage listings, protection of public views to water and integration with the City's Eora Journey and Harbour Walk project.

Public art

Public art is mentioned as a public benefit opportunity in many of the sub-precincts. The City has a strategic approach to public art, and generally does not accept ad-hoc contributions to our public art collection – in part due to the ongoing cost of maintaining the works. A curatorial approach to public art is implemented by the City where public domain strategic thinking assists in identifying opportunities and artists to be involved in city shaping. The City would like to see how the Eora Journey could be integrated into this precinct but note this would need to be done under the leadership of the City and its community advisory panel.

Gender inclusive design

There is an opportunity for gender inclusive design to be considered aligning with the NSW Greater Sydney Commission's Women's Safety Charter. This would ensure increased participation by women and children in the design process as well as in the final built form. This would go beyond just a youth precinct, ensuring an inclusive and safe place for all.

Productivity

Connecting the Peninsula

The Pyrmont Peninsula Economic Development Strategy, July 2020, published by NSW Treasury suggests that by 2041 an additional 800,000 square metres of employment floor space or 23,000 additional jobs could be accommodated within the Pyrmont Peninsula by 2041. This demand should be reviewed in light of the Covid health pandemic and resulting changes to work places needs and practices.

This growth represents a 50 per cent increase against current levels, or around 11,000 more jobs compared to a no metro scenario.

This growth, if it were to eventuate, is estimated to contribute an additional \$4.9 billion per annum to the NSW economy and result in an increase in productivity by 7 per cent due to the growth in jobs in knowledge intensive industries.

The potential of this growth is not possible without a commitment from the NSW Government that a metro station will be constructed as part of Sydney Metro West in Pyrmont by 2028. The NSW Government's vision for an enhanced Innovation Corridor will not be achieved without at least a metro station in Pyrmont as part of Sydney Metro West. Pyrmont is currently one of Australia's most densely populated suburbs – this alone demands a metro station.

A station at Pyrmont as part of Sydney Metro West could be a catalyst for economic and employment growth in the area. Connecting Greater Parramatta to many parts of the Harbour CBD would maximise the economic and employment growth benefits for the Central River City. Providing additional public transport access to the city would allow the City's highly educated, knowledge-intensive labour market access to jobs in Greater Parramatta.

The indirect benefits of locating a station in Pyrmont are also substantial. It would create off-peak and contra-peak patronage, by increasing public transport access to visitor destinations like the Sydney Fish Markets, the Maritime Museum, the Sydney Convention and Exhibition Centre, the Lyric Theatre, the Powerhouse Museum and the Star City Casino. It would provide relief to overcrowded Town Hall station for peak events at Darling Harbour. It would relieve congestion, including from tour coaches, allowing opportunities to transition movement corridors like Harris Street to better places for walking, cycling, working, visiting and investing.

The economic vision

The City generally supports the economic vision for the area outlined in the Economic Development Strategy:

- to continue to play a strong role in the NSW Government's Innovation Corridor, driving innovation through digital advertising technology and new media to complement the planned Tech Central precinct
- create an environment to foster the connection and collaboration of major institutions with industry (including start-ups and small business) to increase productivity through research and innovation, and
- enhance its role as an attractive waterfront tourism and entertainment district supporting the global attractiveness of the Sydney Harbour with a 24-hour economy.

The City also supports the economic success factors for the Precinct:

- **availability (and cost) of commercial floor space:** supply of office and other floor space to accommodate growth in population and employment into the future

- **connectivity:** access to the area (particularly through mass public transport), ability to move around the precinct (e.g. walking, cycling), and connectivity with the Innovation Corridor and other key precincts and employment hubs in NSW, and
- **maintaining character and attraction:** continuing to attract anchor tenants in key industries (including adtech, tourism and entertainment, and education) and small businesses, despite the increasing rents and physical barriers to growth. Additionally, enhanced amenity and entertainment opportunities are key to attracting business, residents and tourists.

Realising the ‘open for business’ vision

The suggested approach for a broad zoning in the planning framework indicates that employment uses will not be prioritised, and as a result, other uses could potentially dominate and reduce opportunities for innovation to meet the proposed future employment targets. This would see history repeating as the SREP 26 planning framework was unable to prioritise employment uses and the vision for a truly mixed working and residential precinct fell short of the employment targets. To avoid this situation and potential lost agglomeration benefits, the strategy and planning framework must clearly prioritise employment uses in a mixed-use environment through explicit directions and planning mechanisms such as differential floor space controls. Further the sub-precinct place priorities, such as number 4 for the Blackwattle Bay sub-precincts, must be redrafted to match the Greater Sydney Commission’s District Plan action to allow ‘residential development without compromising commercial development’.

Building and precincts for target industries

The Economic Development Strategy has limitations and provides no obvious direction on the types buildings, precincts or space requirements for target industries. It suggests a gross employment floor space demand of 800,000 square metres pre-Covid (see Figure 4 for breakdown by industry) but then doesn’t provide guidance on demand should be shaped or realised to accommodate target industries. This is drawn out in both the draft Place Strategy and the Urban Design Framework which outline a growth opportunity from an urban design perspective (Character Height Strategy, Amenity Based Height Strategy and Sites capable of change) but draw no connections with the Economic Development Strategy in terms of shaping how floor space demand should be accommodated.

It is acknowledged that this work will be completed as part of the next stage in Place Strategy development, with the Urban Design Strategic Framework noting that “sub-precincts and larger sites need to be further investigated to determine potential to contribute to the quantum, type and location of floor space targets outlined in the Economic Development Strategy”, however the lack of guidance in the Economic Development Strategy will mean a lack of evidence base.

The Economic Development Strategy should be supplemented by consultation with target businesses and be developed based on the Economic Development Strategy and the economic vision, but also with a mind to aspirational targets around employment growth and industry mix.

Then, as outlined in the Brooklyn Tech Triangle case study presented by the Economic Development Strategy, planning and other incentives can be implemented to encourage development of additional commercial and industrial floor space for target industries due to lack of future supply pipeline.

For example:

- **media and information technology:** the economic vision has a focus on growing the digital advertising technology and new media cluster, however Figure 4 shows that media and information technology only make up 11% of forecast floor space growth.

The Economic Development Strategy states “the presence of media and media-related activities is part of what makes the Peninsula unique. In economic development terms, this is a ‘cluster’ or specialisation on which there is an opportunity to build due to comparative

advantage. Capitalising on the unique character and function of Pyrmont by selectively investing in spaces and supporting infrastructure that will make the area attractive and affordable for these types of businesses will help to ensure the area's continued growth and role in the Innovation Corridor."

The Economic Development Strategy is not specific however in how this industry can be supported to grow; how anchor companies (Google, ABC, Channel 10 etc) can be retained in the area; or what motivated the departure of other key companies (Seven Network and the expected departure of Nine).

- **tourism and entertainment:** a relevant retail strategy should be considered to provide adequate and diversity of offering to suit the new 24 hour economy. A mix of suitable retail spaces including the opportunity to showcase for innovation, co-working or demonstration labs need to be considered as part of the retail mix.
- **industrial:** makes up 11% of forecast floor space growth. On face value this is a product of the forecast which looks at growth in the past and carries it forward. However, as a result of the Covid-19 crisis, weaknesses in our economy are apparent due to our reliance on global supply chains. The Economic Development Strategy should consider addressing advanced, clean and hi-tech manufacturing and its role in the Innovation Corridor ecosystem. Blackwattle Bay and marginal sites adjacent to elevated roadways provide an opportunity to accommodate clean manufacturing that diversifies and makes our economy more resilient.
- **small business:** the Economic Development Strategy highlights the important role the Peninsula plays in accommodating small to medium businesses in a fringe CBD setting. 90 per cent of all businesses in the Peninsula have less than 20 employees. The Economic Development Strategy states "as a fringe offering to the Sydney CBD, the Peninsula has managed to attract and retain small and medium businesses. It is home to 1,700 businesses that produce over \$15 billion per annum in revenue". Small and medium businesses therefore and their building typology, precinct and floor space requirements, should be a key driver in terms of next stage Place Strategy development.

The Economic Development Strategy does state that:

"stakeholders consulted in the development of the Place Strategy highlighted the importance of Pyrmont's amenity in maintaining its attractiveness to enterprise, in particular preserving the mixed-use character of the precinct. For the economic vision to be realised, economic development and accompanying changes to urban character and built form will need to occur in a way that maintains or strengthens Pyrmont's attractiveness", and

"Notably, the majority of the buildings in Pyrmont are five to seven storeys high with floor plates ranging from 2,000 sqm to 5,000 sqm in flexible, campus style configurations"

This suggests that small and medium businesses locate in the Peninsula due to its existing character, amenity and large floor plate campus style building typology. It is the areas point of difference to the CBD that makes it attractive.

In absence of a strategy to deliver building and precinct for target industries, what Figure 4 illustrates is that the high growth floor space industries in Figure 4; 'Other knowledge services' at 18% of forecast growth, and, 'Professional, scientific and technical services' at 16% of forecast growth, have the potential to change the industry mix of the Peninsula and potentially its look and feel, contrary to the economic vision and economic success factors.

Affordable enterprise space

The Economic Development Strategy highlights the importance of considering actions to enable ongoing availability of affordable space for small business, startups and creative industries. It outlines some potential mechanisms that could assist in achieving the strategic vision:

- tax incentives

- grants or Government subsidised rents, and
- planning mechanisms such as Voluntary Planning Agreements, used to provide subsidised commercial floor space to target industries.

Consideration of this issue is essential as highlighted by East London Tech City case study in the Pyrmont Peninsula Place Strategy Project Analysis where government's aim to attract investment and relocation of anchor tenants was successful, but commercial rents doubled, and many smaller innovative companies moved out of the area in order for their businesses to afford rents.

The Economic Development Strategy and the Place Strategy would be strengthened by adopting aspirational affordable enterprise floor space targets for the Peninsula.

The next stage of Place Strategy development should explore more innovative ways to plan for affordable enterprise space. The mechanisms outlined by the Economic Development Strategy are limited in their ability to address the issue and raise significant ongoing operational cost issues for government. State Environmental Planning Policy No 70 – Affordable Housing provides one successful framework on which an affordable enterprise space program could be based.

Figure 5. Floor space forecast by industry to 2041

Reproduced and adapted from Economic Development Strategy, Table 1

Industry	Additional floor space required
Tourism and entertainment	224,000 square metres
– retail trade	
– accommodation	
– food services	
– arts and recreation services	
Other knowledge services	144 square metres
– administrative and support services	
– public administration and safety	
– financial and insurance services	
– rental, hiring and real estate services	
Professional, scientific and technical services	128,000 square metres
Education and training	120,000 square metres
Industrial and other services	88,000 square metres
– manufacturing	
– wholesale trade	
– transport, postal and warehousing	
Media	56,000 square metres
– publishing (except internet and music publishing)	
– motion picture and sound recording activities	
– broadcasting (except internet)	
– internet publishing and broadcasting	
Information technology	32,000 square metres
– telecommunications services	

Industry	Additional floor space required
– internet service providers, web search portals and data processing services	
Healthcare and Social Assistance	8,000 square metres
TOTAL	800,000 square metres

Sustainability

The Pyrmont Peninsula Sustainability Framework Scoping Report, July 2020, prepared by Kinesis provides a solid foundation for the development of a clearly demarcated planning framework that will deliver a low-carbon and highly environmentally efficient precinct as required by the Eastern City District Plan.

The draft Place Strategy however lacks any commitment to the four pillars and performance criteria outlined in the Report meaning there is a very real risk that none of the Reports initiatives will be realised as the Peninsula grows.

The Place Strategy must commit to the following to ensure their delivery in any future planning framework or development proposal, including an overall commitment for the Peninsula to produce net-zero greenhouse gas emissions by 2041.

Multi-utility hubs as precinct infrastructure

They provide flexibility to adapt as demand changes over time e.g. less cars and need for more EV charging. They have the ability to incorporate solutions to other environmental issues e.g. precinct hubs for waste management, recycled water, loading and servicing, energy (batteries and solar) even as experimental urban farms.

However, for these hubs to succeed there will need to be significant further work done to identify the space requirements, suitable technologies, operational and governance arrangements, and of course the investment model and financial structure to make these a reality. The City has concerns that, despite the environmental benefits of these hubs, they may simply become car parking stations. The City strongly objects to any standalone car parking stations in the precinct.

Land should be identified that is marginal in its suitability for uses and not suitable for residential. These are ideal sites for the multi-use hubs, making use of unproductive and unvalued land. This should include under and adjacent to elevated roadways if they are not undergrounded.

Green streets and active spaces

Key active streets are to be reconfigured to facilitate increased green space and canopy to create cooler environments, including increased permeable and soft landscaping, drought-proof water supply, increased canopy cover and facade greening along these streets, delivering the following by 2041:

- 25% canopy cover across the Peninsula
- 2 hectares of distributed new active public space
- 10 hectares of green facades delivered across the ground and lower facades, and
- a reduction of local heat island for pedestrians and cyclists through shade and transpiration.

High performance buildings

Working with multi-utility hubs and green streets, development is to be both high performance and resilient, ready for disruption and ready to make use of solar, batteries, recycled water, electric vehicles, ready to transition parking to new mobility futures.

For residential development this means achieving:

- minimum BASIX Energy 60 for single dwellings
- minimum BASIX Energy 50 for apartments 2-3 storeys

- minimum BASIX Energy 45 for apartments 4-5 storeys
- minimum BASIX Energy 40 for apartments 6-12 storeys
- minimum BASIX Energy 35 for apartments 13-19 storeys
- minimum BASIX Energy 30 for apartments 20+ storeys
- BASIX Water 50 (with recycled water).
- zero on on-site parking for private vehicles.

For non-residential developments this means achieving:

- Commercial office: 6 Star NABERS, or Certified Green Star Design & As Built rating with 5.5 Energy Points
- Shopping Centres: 6 Star NABERS +30%, or Certified Green Star Design & As Built rating with 13 Energy Points
- Hotels: 4.0 Star NABERS +10%, or Certified Green Star Design & As Built rating.

Offsetting to deliver net-zero outcomes

To achieve net-zero greenhouse gas emissions by 2041 some offsetting will be required. The City supports this concept, however significant further work would need to be done to develop a mechanism to achieve this. Requiring occupants of existing buildings to purchase offsets for their carbon emissions would require a regulatory change and an enforcement program.

Governance and implementation

The draft Place Strategy outlines considerations for what it calls a unified and contemporary system of planning controls that is fair, transparent, easy to use and easy to administer.

The City does not support this and requests all sites transition into the Sydney LEP.

Consideration 1: Set a state significant planning framework for Key Sites identified in the Place Strategy

The draft Place Strategy identifies key sites as anchor points for major development to achieve the ambition of the Strategy. Meeting these ambitions will necessitate changes in terms of land use zones and building height and density. The proposed state significant planning framework will:

- Identify key sites as State significant precincts or State significant development under relevant State Environmental Planning Policies
- Provide a permissive, responsive zoning framework that permits a broad range of uses and responds to the needs of the Pyrmont Peninsula, identified in the draft Economic Development Strategy
- Specifies maximum gross floor area and building height controls that must be met in preparing master plans, planning proposals or development applications
- Set a framework for the assessment of public benefit on key sites, potentially using the outcomes of the Productivity Commissioner's review of infrastructure contributions to pilot new or innovative infrastructure funding mechanisms

The City does not agree with this and requests these sites transition into the Sydney LEP.

It is noted that for the Ultimo sub-precinct the City's Central Sydney Planning Strategy applies. The City will work with the Department of Planning, Industry and Environment to ensure the finalised Place Strategy reflects directions of the Central Sydney Planning Strategy.

Consideration 2: Set a consistent planning regime for the Pyrmont Peninsula that responds to the appropriate planning authority and reduces complexity

The draft Place Strategy details that sub-precinct master plans will be prepared for public exhibition by the end of 2020 and outline the detailed planning, design and development requirements to implement the Place Strategy.

The draft Place Strategy outlines that the implementation of the sub-precinct master plans will require changes to land use zones, building height and density, and the introduction of provisions to ensure community infrastructure is delivered, through an amendment to the relevant planning instrument.

This aspect should be undertaken by the City of Sydney.

The draft Strategy indicates that this may happen over a longer period and that it may be the City's responsibility to implement through:

- a Ministerial Direction under Section 9.1 of the *Environmental Planning and Assessment Act 1979*, to ensure all future rezonings are generally consistent with the Place Strategy and sub-precinct master plans, and/or
- an amended Sydney LEP, or relevant instrument/s, to change planning controls across the Peninsula, in a staged manner (for example, over priority master plan areas or key sites)

Consideration 3: Explore the review of State planning instruments where layering of development controls is unnecessarily complex and can be better managed by the City of Sydney

This is strongly supported by the City of Sydney.

The draft Place Strategy acknowledges that much of the confusion relating to various planning instruments applying to the Peninsula relates to State policies made at various times, such as the *Darling Harbour Development Plan No. 1* or the *Sydney Regional Environmental Plan No. 26*.

The City agrees and requests that as part of finalising the Place Strategy, the Department of Planning, Industry and Environment consider the return planning controls in the peninsula and surround back to the City of Sydney and allow them to be integrated into a single instrument.

