

9 September 2020

Mr Jim Betts
Secretary
Department of Planning Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Via email: Pymont.peninsula@planning.nsw.gov.au

Dear Mr Betts,

RE: SUBMISSION TO THE DRAFT PYRMONT PENINSULA PLACE STRATEGY

This submission has been prepared by TOGA in response to the exhibition of the Draft Pymont Peninsula Place Strategy dated July 2020 (the draft Strategy), and focuses on a significant 1.47ha landholding under our ownership at 28-48 Wattle Street and 50-54 Wattle Street, Pymont (also known as 39 Jones Street and 45 Jones Street, Pymont respectively). For simplicity, the land will be referred to herein by its Wattle Street addresses only.

We commend the Department of Planning, Industry and Environment (DPIE) releasing the draft Strategy in accordance with the timeframe initially proposed and welcome the opportunity to provide further feedback on the final Strategy. Having clear language in the final Strategy is key to providing both a unified framework unencumbered by ambiguous controls, as well as clarity and certainty for landowners and Council on future redevelopment.

1.0 Executive Summary

We are seeking to transform 28-54 Wattle Street, Pymont into a knowledge-intensive business cluster for health, education, innovation, technology, and creative industries that will significantly contribute to the delivery of the Place Strategy.

To enable this vision, we request DPIE to:

- reflect TOGA's plans as part of the Wentworth Park sub-precinct Masterplan;
- specifically note that additional floors can be added above heritage buildings as part of a redevelopment;
- adopt a base FSR of 4.4:1 with the ability to increase to 4.8:1 under a design excellence scheme for our site; and
- adopt the RL height standards as requested in this submission.

Further, in order to facilitate the orderly redevelopment of the site and delivery of DPIE's draft Strategy, we would request that DPIE prioritise the completion of the sub-precinct masterplans and include relevant planning controls requested above relating to bulk/massing, RL height limits, and FSR. This will remove ambiguity with interpretation and provide greater certainty on planning proposals and development application submissions as well as future redevelopment.

2.0 The Site

The site is bound by Jones Street to the east, Quarry Street to the south, Wattle Street to the west and Fig Street to the north. It is one of the largest pieces of land under single ownership on the peninsula, with an area of 14,724sqm. It is situated in the Wentworth Park Sub-Precinct of the draft Strategy. A light rail station is within a 5-minute walk, and it is only a 10-minute walk to Town Hall with the edge of the CBD situated just 600m to the east. It is also 700m south of the Sydney Metro investigation area surrounding Union Square.

Existing Development

The site contains the former "Winchcombe Carson" woolstore at 28-48 Wattle Street and the former "ESGM & Co" woolstore at 50-54 Wattle Street. The buildings form part of a group of woolstores along Wattle Street which have heritage value as evidence of wool handling and storage in the late nineteenth century and the first half of the twentieth century. Due to the unique topography of the site, with a steep drop off from Jones Street, the buildings present a one to three storey frontage to Jones Street and a five to seven storey frontage to Wattle Street.

Surrounding Development

The surrounding area is characterised by a mix of commercial, residential, and recreational uses. To the north of the site is a substantial development site currently consisting of an old Council depot. The Wentworth Park light rail station adjoins the old Council depot site to the north. To the east is a row of terrace dwellings within a heritage conservation area, opposite 28-48 Wattle Street, and a three-storey residential flat building opposite 50-54 Wattle Street. To the south of the site is the newly constructed Ultimo Public School which has a height of one storey fronting Jones Street and three storeys fronting Wattle Street. West of the site is Wentworth Park.

An aerial image of the site and current lot boundaries is shown at Figure 1.



Figure 1 Site Context

Source: Nearmap & Ethos Urban

3.0 Draft Pyrmont Peninsula Place Strategy

It is important to reiterate that the draft Strategy is intended to be a document that provides a clear framework for future development that gives confidence to landowners to proceed with proposed plans in the near future.

In general, we support the draft Strategy and the vision outlined in the Wentworth Park Sub-Precinct in which our landholding is situated, and the sub-precinct's priority to focus change along the Wattle-Jones Street corridor. We strongly support the sub-precinct priority for the adaptive re-use of the old woolstores, and we would welcome the conversion of Wattle Street into a two-way traffic boulevard to and from Broadway.

While the Wentworth Park Sub-Precinct section of the strategy does make mention of the elevation difference between Jones and Wattle Streets and outlines a transitional building height approach to massing, it remains ambiguous whether additional floors above the heritage buildings will be permissible. Additionally, the Wentworth Park Sub-Precinct Priority List is silent on the likely intervention works required to adapt this style of building. It has been demonstrated with other large-footprint woolstore conversions that a moderate degree of intervention is required to provide adequate natural light for an effective adaptation of the lower floors in the centre of the building. Without such intervention the floor space will not receive any natural light and cannot be considered a suitable and effective adaptation, leaving it useful only for industrial/storage-type uses.

Response to draft Strategy

As the draft Strategy stands, the rules remain unclear and it does not deliver certainty for investment, contrary to direction four of the Ten Directions (Direction 4: Unified Planning Framework – *clearer rules delivering greater certainty and investment*).

We request the Wentworth Park Sub-Precinct Priority 3 be expanded to specifically denote the ability to add additional floors above the existing floors of the heritage buildings, subject to heritage review and consent, and to allow appropriately considered intervention to the existing fabric (including the roof). Furthermore, we request the suggested re-use opportunities as described in the Wentworth Park Sub-Precinct priorities also specifically include commercial as a potential use, with the success of the current conversion of the woolstore at 45 Jones Street to office being testament to an inherent demand for office space in the area.

Finally, we request that new height controls across the site using RLs are adopted, with a clear capacity to deliver additional floors above the existing building. This will enable the site to realise its potential to provide the essential attributes to attract the types of anchor businesses that would spur the desired growth in the area. By using RLs to determine height, the need for interpretation will be eliminated, thus providing clear controls for landowners and authorities.

We believe that, subject to an appropriate design excellence scheme, an FSR of 4.8:1 is an appropriate density for the site, that will satisfy environmental conditions and stimulate activity in the area along with further jobs.

4.0 TOGA's Vision

At almost 15,000sqm the site represents one of the most substantial landholdings in single ownership within the draft Strategy area.

We acknowledge the site's potential to help the Place Strategy and Wentworth Park Sub-Precinct achieve its goals by:

- Aspiring to create an active knowledge intensive business cluster with a mix of commercial and retail uses, utilising strong place making to attract and engage with surrounding community (Wentworth Park Sub-Precinct Priority 2)
- Revitalising the ground plane and creating through-site links between Jones Street and Wattle Street, thereby creating a desirable connection from the peninsula to Wentworth Park (Wentworth Park Sub-Precinct Priority 2)

- Respecting the current and future plan for public open space at Wentworth Park by not causing additional overshadowing in the proposed redevelopment envelope (Wentworth Park Sub-Precinct Priority 3)
- Restoring Heritage and embracing the history and character of the site for all to appreciate (Wentworth Park Sub-Precinct Priority 6)
- Upgrading the surrounding streetscape by improving footpaths and connectivity in and around the Pyrmont Peninsula, and to and from the CBD (Wentworth Park Sub-Precinct Priority 5, 7, 8, 9, and 10).

Our vision remains closely aligned to the draft Strategy, and has positioned this site as one to drive economic growth by creating the space to house upwards of 7,000 workers, facilitate the creation of new jobs and provide support to universities, creative, and technology uses. We also note that a number of tertiary education institutions have expressed interest in the proposed redevelopment of our site and buildings.

Prior to the commencement of the Greater Sydney Commission's (GSC) Pyrmont Review, we were in the early stages of developing our own vision to transform the site into a knowledge-intensive business cluster that would be attractive to health, education, innovation, technology and creative industries aligned with the GSC, DPIE and the City of Sydney's strategic vision for the Innovation Corridor.

We have undertaken numerous studies to date including testing appropriate massing, investigating heritage issues and formulating appropriate responses, and structural investigations. With the knowledge gained from these studies, we have a strong grasp on the capacity for re-purposing the old woolstore to suit the growing needs of the Pyrmont Peninsula. A preliminary Heritage Impact Statement prepared by Urbis Heritage provides in principle support for the redevelopment of the site.

The aforementioned Heritage Impact Study, compliant 4.4:1 FSR option, and larger 4.8:1 FSR options were previously provided to DPIE in our submission on the initial 'Ten Directions'. These studies demonstrate how the site may be sensitively repurposed in accordance with the objectives of the draft Strategy. This results in a development across the two sites which delivers a combined GFA of up to 71,000sqm, with floor plates ranging between 745sqm and 4,800sqm that would be capable of accommodating a wide range of employment uses. Importantly, solar analysis was undertaken on the proposed massing to ensure no additional overshadowing to Wentworth Park.

Our site's potential to accommodate large floorplates, its location on the city fringe and its potential for pedestrian pathways to create a connection to the core of the City from the Inner West, place it in a unique position to deliver a substantial commercial development for over 7,000 workers, encourage and support collaboration with universities, and complement the redevelopment of the new Sydney Fish Markets and the public open space of Wentworth Park – all of which is aligned with the directions and objectives of both the broad draft Pyrmont Peninsula Place Strategy and its Wentworth Park Sub-Precinct Priorities.

Importantly, this can be achieved while celebrating the distinct heritage characteristics of the site. It is considered that its laneways and connections could also be revitalised to create a lively destination, adding a unique dimension to the precinct to attract workers and residents both day and night. The proposal generates opportunities for conservation, restoration, and interpretation of significant building fabric, and the proposal provides for an unprecedented level of access to the former Winchcombe Carson woolstore by the public. By creating a destination adjacent to Wentworth Park, the site will play an important part in activating the park's use as public open space by drawing foot traffic south from the Fish Markets Redevelopment/Blackwattle Bay Sub-Precinct, and west from Tumbalong Park and Pyrmont Village.

We would again welcome the opportunity to work collaboratively with DPIE and the City of Sydney in preparing and resolving the Wentworth Park Sub-Precinct masterplan.

Should you require any further information in relation to the matters raised in this submission, please do not hesitate to contact me on the details provided below.

Yours Sincerely,
TOGA Group of Companies



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