

**Subject: Draft Pyrmont Peninsula Place Strategy July 2020****– Department of Planning, Industry and Environment**

*Preamble:* Bays Community Coalition comprises community representatives from suburbs surrounding the Bays - Annandale, Balmain, Glebe, Pyrmont, Rozelle, White Bay and Ultimo. This group enjoys over 20 years of local knowledge, diverse expertise and experience.

**General comments follow on the draft Pyrmont Peninsula Place Strategy:**

1. Page 4 – Executive Summary states “The Pyrmont Peninsula has always been a place of work and innovation.....This draft Place Strategy is positioning Pyrmont to be an attractor for global investment, .....a place at the cutting edge of the future...” etc.

From a community perspective this draft Place Strategy is heavily weighted in a jobs, commercial and business context, and lacks empathy for what the foundation of any great precinct is built on, that is people, housing, community and lifestyle. The community aspires for the development of Pyrmont to be planned in such a way that people, social infrastructure and community services come first.

2. Page 4 – the draft Place Strategy’s Executive Summary reads “key directions for Pyrmont are:

1. Jobs and industries of the future
2. Development that complements or enhances the area”

whereas for the on-line community and stakeholder’s survey, i.e. the [Pyrmont Peninsula Place Strategy Phase 1 Engagement Report - June 2020](#) stated “key directions for Pyrmont are:

1. Development that complements or enhances the area
2. Jobs and industries of the future”

Comment: the changing of these first two key directions from being community focused to “jobs and industries” focus immediately tells the story as to what this Place Strategy is about, i.e. new jobs and industry leads (is priority) and community follows. This message about new jobs and economics is repeated ad nauseam throughout this draft whereas people, residents and community appear to be secondary. If we want to ensure the Pyrmont Place Strategy leads to a fantastic result for residents as well as commercial interest, then people, residents and community must come first.

3. Page 5 – Strategy’s Executive Summary states “the draft Place Strategy aims higher – its sets out the Five Big Moves that articulate the ambition for the Pyrmont Peninsula to fully embrace its potential:

1. World class foreshore
2. 24 hour cultural and entertainment destination
3. New Metro Station
4. Low carbon and high performance precinct
5. Activated public spaces

The draft Place Strategy also identifies key sites, where development will drive new jobs while providing impetus for the “Big Moves”.....

Again, the draft Place Strategy and its “Big Moves” are primarily focused on jobs, business and commerce, and not on a more balanced focus embracing residents. For the Strategy to be a great success and an attractor to both residence and commerce, then the focus needs to be more inclusive of people, community and lifestyle underpinned with social infrastructure and community services as a top priority “Big Move” and “Key Direction”.

4. Page 9 and Page 44 – the Strategy incorporates the Glebe Island Bridge in the defined “Pyrmont Peninsula” zone but does not show it as being a “Heritage Conservation Area” or included as part of the foreshore walk. The Glebe Island Bridge is listed on the NSW State Heritage Register (completed in 1903 and demonstrates one of the earliest electrical powered bridges in Australia) and needs to be included in the Place Strategy as a “Heritage Conservation Area”, and a commitment needs to be made that this Bridge will be refurbished as a key low level, easily accessible pedestrian and cycle connection.
5. Page 18 – Strategy’s Section 03 Context states **“The economic strategy describes the area’s current economic character , analyses the drivers of growth and change, and forecasts future demand for new jobs and floor space assuming a Sydney Metro Station is delivered in Pyrmont in the next decade leading to the following forecasts:**
  - **Strong growth in jobs: an increase of 20,000 – 23,000 jobs to 2041**
  - **A local economy that is approximately 60% larger by 2041...**
  - **An increase in productivity.....**
  - **Greater supply of commercial buildings: an additional 600,000 – 800,000 square metres of floor space.....**
  - **Increase retail and residential development....**
  - **An industry mix geared towards knowledge industries.....”**

The draft Place Strategy provides specific detail re: forecasts for jobs, economy, commercial floor space, etc. to 2041 but provides NO summarised forecast of additional houses and apartments, and supplementary residents. Without this critical forecast information the Strategy lacks substance and it would be impossible for the Government to commence a robust and meaningful development based on this current draft strategy.

With no forecast for proposed houses / apartments and increase in population the Strategy is missing a key piece of the development planning puzzle.

The draft Place Strategy’s Section 03 Context needs to include a forecast of the number of houses and apartments that are planned to be built and the approximate number of residents that these houses / apartments will accommodate. Without this information the Strategy cannot adequately plan for the social infrastructure and community services required to complement this development.

Infrastructure and services to include:

- aged care facilities
- community centres
- libraries
- community gardens
- men sheds
- child care facilities
- domestic violence / women refuge centres
- social and affordable housing
- pre-schools
- primary and secondary schools
- recreation facilities

Given the Draft Place Strategy forecasts an increase of 20,000 - 23,000 jobs to 2041 but has no forecast for residential growth, it is not possible for the Government to develop a relevant Traffic Management Plan for the proposed expansion of the Peninsula over the coming years.

6. This section compares the **Draft Pyrmont Peninsula Place Strategy's Responses (July 2020)** with the **"Next Steps" / "What will you see from us next"** as stated in the **Pyrmont Peninsula Place Strategy Phase 1 Engagement Report - June 2020 – Department of Planning, Industry and Environment (\*)**.

(\*) This Engagement Report was the outcome of an **"Online Survey - 217 responses, 67% residential, 8% work here and 1% businesses, as well as 33 Stakeholder submissions from: Community & Interest Groups, Businesses & Land Owners, Peak Bodies & Industry Associations, Government & Others)"** which **"allowed community members to provide feedback on a range of issues between 28 March 2020 and 24 April 2020. Key stakeholders also provided individual submissions - a total of 34 submissions were received."**

For the Government's proposed 10 key Directions (defined in the draft Strategy and Engagement Report), a comparison is made of the Engagement Report's **"Next Steps"** with the Place Strategy's **"Responses"** and comments follow:

<p>Report's 5.0 Next Steps</p> <p>5.1 Review of the 10 Directions</p> <p><b>Direction 3. Centres for residents, workers and visitors</b></p> <p><b>What will you see from us next?</b></p> <p>A social infrastructure analysis based on demographic forecasts that will explore needs now and into the future</p> <ul style="list-style-type: none"> <li>• Analysis of the capacity of existing infrastructure critical to support evolving places</li> <li>• Identification of areas, services or infrastructure requiring provision or enhancements to deliver new lively and attractive centres for everyone to enjoy</li> </ul>
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**Page 30 - Place Strategy Response:**

**Direction 3. Centres for residents, workers and visitors**

- **Harris St rejuvenation**
- **Existing centres at the northern end of Harris St are reinforced and enhanced**
- **New centres of activity created at the southern end of Harris St**
- **Renewal sites (within the Blackwattle Bay, Darling Island and Tumbalong Park precincts) deliver new public spaces, shops and services to create smaller nodes of activity**

**Comment – the Draft Place Strategy Response does not reflect the "Next Steps" from the Phase 1 Engagement Report. The Pyrmont community, like all healthy and sustainable communities, wants to see a strategy that clearly explains the specific social infrastructure and services planned for the Peninsula development, such as:**

- aged care facilities
- community centres
- libraries
- community gardens and men sheds
- child care facilities
- domestic violence / women refuge centres
- social and affordable housing
- pre-schools
- primary and secondary schools
- recreation facilities

#### Report's 5.0 Next Steps

##### 5.1 Review of the 10 Directions

#### **Direction 7. Making It Easier to Move Around**

What will you see from us next?

Place-based transport approach for the Peninsula

- A preferred overall transport scenario and refined movement and place typology for streets in the Peninsula
- Travel demand management plan and sustainable parking strategy
- Identify and prioritise transport initiatives to support the strategy

#### **Page 34 - Place Strategy Response:**

#### **Direction 7. Making It Easier to Move Around**

- **Foreshore walk**
- **Active transport corridor along Pyrmont and Jones Streets**
- **Ridge to Harbour walking links**
- **Investigate a new street based public transport link along Harris St**
- **Safe and legible interchange between bus, light rail and ferry as well as possible Metro Station**

**Comment – the Draft Place Strategy Response does not reflect the “Next Steps” from the Phase 1 Engagement Report. Since at least 2013, the Pyrmont community has asked Urban Growth (now redundant) and the Department of Planning for a Pyrmont Transport Master Plan.**

**The Blackwattle Bay / Pyrmont / Peninsula zone is currently a transport nightmare and what the community wants is for this problem to be resolved prior to further commercial and residential development taking place. We see what has happened around the Moore Park, Waterloo / Alexandria / Green Square suburbs due to horrible traffic congestion and we don't want this to be repeated in the already vehicle grid locked Blackwattle Bay / Pyrmont precinct. Traffic is a major problem for the Peninsula and a Metro Station will be helpful but not a solution. We need transport / traffic to be a priority “stand alone” section in the Place Strategy!**

#### Report's 5.0 Next Steps

##### 5.1 Review of the 10 Directions

#### **Direction 9. Great homes that can suit the needs of more people**

What will you see from us next?

The viability of affordable housing contributions in the area

- Potential affordable housing contribution rates
- Implementation, staging and prioritisation of the delivery of affordable housing in the area

#### **Page 36 - Place Strategy Response:**

#### **Direction 9. Great homes that can suit the needs of more people**

- **Housing growth is focussed primarily in residential areas, across the ridgeline village and along the western side of .....Blackwattle Bay...**
- **Housing is expected to be incremental under the planning system and in smaller developments of lower scale, and compatible with the historic nature of the areas**
- **Affordability to ensure a mix of people can live on the Peninsula including social, affordable rental and market housing**

**Comment – the Draft Place Strategy Response does not reflect the “Next Steps” from the Phase 1 Engagement Report.**

**Firstly, housing growth is focussed along the Eastern side of Blackwattle Bay not the Western side.**

Secondly, the planned construction of 45 storey commercial / residential buildings along the Eastern side of Blackwattle Bay accommodating 1045 to 1700 homes and 4000 to 7000 jobs (NSW Government “Revitalising Blackwattle Bay” – Three Scenarios) does not reflect the Place Strategy Response “Housing is expected to be incremental under the planning system and in smaller developments of lower scale, and compatible with the historic nature of the areas”. There appears to be a massive disconnect as to what is being said and what is being planned!

Thirdly, for a healthy, vibrant and sustainable community it is imperative that planned residential development for the Pyrmont Peninsula commits to a minimum of 10% Affordable Housing as well as at least 5% Social Housing. We need to stop playing with rubbery numbers (i.e. Greater Sydney Commission’s 5% to 10%) and consider how a great city really functions (now more obvious during the Covid pandemic and the redefining of essential services) and commit to at least 10% Affordable and at least 5% Social Housing for all new residential development proposed for the Pyrmont Peninsula.

Question: How is this rule being applied to current development in the City of Sydney and is it being audited to see whether what is being asked of developers is being applied and achieved?

7. Page 39 - Section Big Move 1 – A world-class harbour foreshore walk. This section includes a plan view of the Pyrmont Peninsula’s waterways, Existing links and Final Links for the Foreshore walk and shows the Glebe Island Bridge but makes no mention of any future plans for this Bridge.

For this harbour foreshore walk to be “world class” the Glebe Island Bridge needs to be refurbished, reinstated and included in this walk. Imagine what a resounding success this historic / heritage designated bridge walk would be by enabling pedestrian and cycling low level access from the CBD and Blackwattle Bay to Glebe Island, White Bay, Balmain, East Balmain and Rozelle, as well as other surrounding communities. This Bridge needs to be part of this Strategy.



**Glebe Island Bridge - An Active People Movement Corridor**

Image courtesy of [Glebeislandbridge.com](http://Glebeislandbridge.com)



8. Page 46 - Section 08 Structure Plan states **“The Structure Plan sets the foundations to take the Peninsula to the next level as a jobs hub, while ensuring key placemaking and public benefit outcomes are secured with growth and change. It is focussed on delivery of:**

- 1. A diverse, connected, restorative public domain**
- 2. An integrated movement network**
- 3. Ridgetop village character and community**
- 4. Significant renewal sites at parks and harbour edge”**

Comments on these deliveries:

Comment 1. A “restorative public domain” is a stretch of the imagination given the Peninsula is already one of the most densely populated precincts in Australia.

Given the proposed Strategy and one of the 4 “key sites”, i.e. Blackwattle Bay being projected by the Government as having:

- residents - 1700 homes providing possible accommodation for 4000 (+) people
- workers – estimated 7000 jobs
- visitors – present 2.5M per year and predicted to double to 5.0M per year by 2030

And the Strategy forecasting for the Peninsula by 2041, an increase of 20,000 – 23,000 jobs and an additional 600,000 – 800,000 square metres of commercial floor space, how can this be “restorative”?

Comment 2. “An integrated movement network” - given the Peninsula is currently one of the most vehicle gridlocked precincts in Australia a Metro Station will help but not fix this problem.

Any transport plan for the Pyrmont Peninsula cannot be written in isolation, given:

- current traffic impasse from the Western Distributor / Bank St / Pyrmont Bridge Road approach to Anzac Bridge, peak times already at a standstill
- Pyrmont’s strategic location in relation to other adjacent major developments that are either under construction or planned for the near future, such as:
  - Department of Roads and Transport - Rozelle Interchange
  - Port Authority of NSW - Materials Handling and Concrete Batching Plant at Glebe Island – planned to move approximately 360 concrete trucks from this facility, daily, i.e. 720 truck movements

In UrbanGrowth’s The Bays Precinct Sydney - Transformation Plan (October 2015) Section 8.3 Transport and Getting Around states *“We don’t have the solution yet but transport solutions are being investigated as part of the NSW Government’s Bay Precinct Comprehensive Transport and Mobility Plan. This will develop an integrated package of public transport, walking, cycling and road network improvements to serve The Bays Precinct Destinations as well as port functions.”*

Since publication of UrbanGrowth’s Transformation Plan in 2015, Pyrmont Peninsula community groups have repeatedly asked for the Government’s Transport and Mobility Plan and since 2015 no Plan has been forthcoming.

As they have done for jobs and commercial buildings (See Section 03 Economic Context Page 18) the Government needs to forecast vehicle (cars, taxis, trucks, buses, tourist buses, etc) movement so that a realistic and relevant Transport and Mobility Plan can be tabled prior to agreeing on any Pyrmont Peninsula Place Strategy.

Comment 3. “Ridgetop village character and community” – this statement contradicts the Place Strategy given the Strategy (Page 79) is proposing at least one commercial / residential tower (Star Casino) built to RL 180, i.e. approximately 65 storey building. Also, it is proposing to approve construction at the Blackwattle Bay site, buildings accommodating 45 to 52 storeys, i.e. Obstacle Limitation Survey height (\*)! Any new buildings should relate to the existing neighbouring areas.

Also, what other skyscrapers are planned for the Peninsula that we don’t know about?

(\*) Stated in the NSW Government’s Revitalising Blackwattle Bay Paper “RL 156 is Obstacle Limitation Survey (OLS) height for aircraft movement. Height above the OLS is subject to federal authority approval. Referred to as the OLS it is approx. 45 storeys.”

How can aircraft movement building heights reflect a “Ridgetop village character and community”?

9. Pages 48 to 66 – Section 09 Sub Precincts – seven sub-precincts have been identified in the draft Place Strategy, and people and jobs for these sub-precincts have been defined as:

Draft Place Strategy - July 2020		
Sub-Precincts	More People	More Jobs
Darling Island	600	2735
Tumbalong Park	2055	2870
Ultimo	2350	8700
Wentworth Park	1115	1200
Blackwattle Bay (*)	2055	5770

Table 1

In comparison, the NSW Government’s Revitalising Blackwattle Bay Paper of June 2020 (Table 2) summarises three scenarios with projected home and job numbers for Blackwattle Bay.

Revitalising Blackwattle Bay Paper - Three Scenarios - June 2020						
Sub-Precinct	Scenario 1		Scenario 2		Scenario 3	
	More Homes	More Jobs	More Homes	More Jobs	More Homes	More Jobs
Blackwattle Bay	1700	4000	1160	5000	1045	7000

Table 2 (\*)

Why don’t the Strategy’s numbers reflect the numbers tabled in the June 2020 Revitalising Blackwattle Bay Paper, as seen in Table 2? These rubbery figures create doubt as to the integrity of the Draft Place Strategy.

10. Page 66 Blackwattle Bay At a Glance – again, why don’t the people and job numbers in the Draft Place Strategy of July 2020 reflect the numbers stated in the Revitalising Blackwattle Bay Paper of June 2020?

The section headed; **Opportunities and challenges for the future**, states:

- “Revitalisation can address the barrier of private land ownership to bring better connections to the foreshore, a new urban quarter for jobs and some homes.”

Comment – how can it be said that the proposed 1045 to 1700 more homes is “some homes”?

- Residential development is can be planned for in a way that does not compromise the objective of providing new space for jobs”

Comment – apart from poor grammar, why does “new space for jobs” take precedence over the planned massive residential development along the Eastern side of the Bay? It appears that this Place Strategy is more economic and job focussed rather than residence and community focused, why?

Also, the Place Strategy says “Blackwattle Bay will transform from industrial and infrastructure to a place attracting business and employees, visitors and tourists.....”.

Comment - again, why is the Place Strategy focused on commerce and jobs rather than what the Government’s plans are for Blackwattle Bay, i.e. Fish Market, some commercial combined with expansive residential development?

#### 11. Page 67 Blackwattle Bay place priorities – says:

Point 1 “Redevelop Blackwattle Bay into a new urban quarter based around jobs, visitors and entertainment”

Comment – why is this Place Strategy’s priority focused on “jobs, visitors and entertainment” and not on residence and community?

Point 2 “Provide commercial space for contemporary jobs and businesses to support the Innovation Corridor”

Comment – why is this Place Strategy’s priority focused on “jobs and business” and not on residence and community?

Point 3 “Investigate the establishment of new entertainment, events and cultural space”

Comment – why is this Place Strategy’s priority focused on “entertainment, events and cultural space” when the proposed priority for the Bay is the Fish Market, some commercial and majority residential. The CBD’s Circular Quay and Pyrmont’s Star Casino and Darling Harbour are hubs for entertainment, events and cultural space, so why does the Bay have to replicate the Quay, the Casino and Darling Harbour areas as the Bay’s focus is predominately the Fish Market and residential with some commercial?

The Place Strategy appears to negate the objectives of the Greater Sydney Commission by creating 3 cities. From reading this draft Strategy it is apparent that the Commission’s 3<sup>rd</sup> city is being squeezed into the Pyrmont Peninsula, why?

Point 4 “Ensure any residential development does not compromise the quality and attractiveness of Blackwattle Bay as a place for commercial or entertainment uses...”

Comment – again, why does the Place Strategy favour “commercial or entertainment uses” when the proposed priority for the Bay is the Fish Market and residential with some commercial?

#### 12. Page 78 – Framework Key Sites - Sub-precinct additional public benefit opportunities – Special Conditions states:

**Blackwattle Bay – building heights with upper ranges limited to RL 120 – RL 156**

Comment - stated in the NSW Government’s Revitalising Blackwattle Bay Paper “RL 156 is Obstacle Limitation Survey (OLS) height for aircraft movement. Height above the OLS is subject to federal authority approval. Referred to as the OLS it is approx. 45 storeys.”



The RL for the Anzac Bridge's Pylon is RL 120, i.e. 38 storeys and the tallest buildings in the proposed Bay residential development have an RL 156, i.e. 45 storeys, why are the proposed Bay's commercial / residential buildings so out of keeping with the scale and proportions of its surrounding landscape and structures?

Strategy's Section 9 - Great homes that suit the needs of more people quotes "Great community vibe, mix residential and commercial use with focus and emphasis on heritage. Low to medium density living means you get to know your neighbours."

Comment – why is the NSW Government quoting the intrinsic values of "Low to medium density living means you get to know your neighbours" yet completely ignoring these values when planning for high rise development in their draft Pyrmont Peninsula Place Strategy?

## SUMMARY

1. The draft Place Strategy lacks substance and is flawed as its general context and focus is jobs and commercial, not residence and communities.

The context and focus of this Place Strategy should be more balanced and include what residents / communities really want to see when planning for the Pyrmont Peninsula's future growth. What they want to see is what social infrastructure and community services are being planned for and included in the Place Strategy. This infrastructure and services to include:

- aged care facilities
  - community centres
  - libraries
  - community gardens
  - men sheds
  - child care facilities
  - domestic violence / women refuge centres
  - social and affordable housing
  - pre-schools
  - primary and secondary schools
  - recreation facilities
2. The draft Place Strategy needs to include a forecast of the number of houses / apartments that are planned to be built and the approximate number of residents that these houses / apartments will accommodate. Without this information, social infrastructure and community services cannot be properly planned.
  3. The draft Place Strategy needs to include a forecast of the number of houses / apartments / residents. Without this information meaningful Traffic / Transport Master Plans cannot be developed.
  4. The refurbishment of the Glebe Island Bridge needs to be incorporated in the draft Place Strategy.

5. **A commitment needs to be made in the draft Strategy that Affordable Housing is at least 10% and Social Housing needs to be at least 5%.**
6. **All new buildings should relate to the existing scale of neighbouring areas and not be standalone and insensitive edifices.**

Bays Community Coalition – Convenor, Damien Hawcroft

For, and on behalf of the following organisations :

Pymont Community Coalition  
Jean Stuart – Convenor  
Damien Hawcroft – Co Convenor

Balmain/ Rozelle Residents' Association  
Kath Hacking – Convenor

Pymont Action Inc  
Elizabeth Elenius – Convenor

Friends of White Bay  
Michele Hacking – Secretary

Annandale Residents' Group  
Maire Sheehan -