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Project Leader
Pyrmont Peninsula Place Strategy
Department of Planning, Industry and Environment
Locked Bag 5022, Parramatta NSW 2124

Dear Sir / Madam,

SUBMISSION TO DRAFT PYRMONT PENINSULA PLACE STRATEGY

EXECUTIVE SUMMARY

This submission has been prepared by Urbis Pty Ltd (**Urbis**) on behalf of our client, Celestino, in response to the public exhibition of the draft Pyrmont Peninsula Place Strategy (**PPPS**). Celestino is the owner of land at 31-35 Bank Street Pyrmont, located on the north-western side of Blackwattle Bay.

An executive summary of this submission to the draft PPPS is provided below:

- Celestino encourages NSW Department of Planning, Industry, and Environment (**DPIE**) to reinforce the catalytic role of Blackwattle Bay in the economic growth and transformation of this key site into a new urban quarter and to maintain the emphasis on renewal, job creation, and economic activity of the precinct over the next 20 years.
- The successful realisation of redevelopment of the peninsula and the delivery of significant public benefits (including the waterfront promenade) is contingent on economically feasible proponent-led development proposals commensurate with an appropriate planning framework, particularly in relation to land use mix, urban design controls, and built form parameters (density, building height, floorplates, setbacks etc).
- We ask that DPIE acknowledge the tangible economic and community benefits of establishing an uninterrupted waterfront promenade along the Blackwattle Bay foreshore is reliant upon site-specific proponent-led developments.
- We recommend that the PPPS Structure Plan acknowledges the suitability and capacity of land to the south of Bank Street to achieve high density development commensurate with taller buildings, where it is supported by robust urban design analysis and can deliver acceptable amenity and design excellence outcomes.
- Celestino is committed to early delivery and activation the site including the foreshore link; however, this is contingent on an appropriate planning framework that supports economically feasible and commercially viable development.

OVERVIEW

Celestino's landholding at 31-35 Bank Street Pyrmont comprises Lots 20, 21 and 22 in DP811844 (herein referred to as **the site**). Their site is a significant landholding, positioned on the southern foreshore of the Pyrmont peninsula towards the north-western end of Blackwattle Bay.

Celestino welcomes the opportunity to provide feedback on the publicly exhibited draft PPPS and congratulates DPIE, NSW Treasury, and City of Sydney (**Council**) on reaching a significant milestone towards delivering a 20-year vision for Pyrmont as an innovative, creative, and cultural precinct and an engine room for the Eastern Harbour CBD.

The draft PPPS establishes an intent for a clear, logical set of directions and infrastructure and governance opportunities to guide future investment and transformation in Pyrmont while celebrating the peninsula's rich heritage and charm. The place-based approach to addressing complex, interwoven planning, design, and development issues is commendable. In particular, Celestino strongly supports Blackwattle Bay as a Key Site and as a place for significant transformation to become a new urban quarter and tourism destination given that it is the only undeveloped brown field opportunity on the peninsula coupled with its iconic high amenity location.

In preparing a submission to the recent public exhibition of the *Revitalising Blackwattle Bay* consultation brochure, Celestino developed a concept design proposal for a high-quality mixed-use tower for 31-35 Bank Street as a base case for development of the site. The overarching vision is to deliver a vibrant waterfront promenade, ground plane retail and commercial activation land uses at podium levels, and high-amenity residential accommodation at the upper levels.

The successful realisation of this vision and the delivery of significant public benefits (including the waterfront promenade) is contingent on economically feasible proponent-led development proposals commensurate with an appropriate planning framework, particularly in relation to land use mix, urban design controls, and built form parameters (density, building height, floorplates, setbacks etc). In this regard we commend the PPPS for identifying maximum building heights of 156m for the Blackwattle Bay sub precinct. This type of height will be vital to unlocking development of the three private land holdings including the site.

The concept proposal for Celestino's site is aligned and consistent with the overarching vision for Blackwattle Bay embedded in the draft PPPS and is underpinned by the following key principles:

- Contributing to an activated ground plane;
- Increasing employment close to Central Sydney through innovation and education land uses;
- Delivering a continuous waterfront promenade and completing the missing link to the 15 km Sydney Harbour Foreshore Walk from Woolloomooloo to Rozelle;
- Introducing a new through site link, connecting Pyrmont Peninsula to the waterfront; and
- Creating new homes that contribute to a vibrant and safe twenty-four-hour place.

Celestino has reviewed the draft PPPS and the accompanying documentation and generally endorses its overarching vision and the 10 Directions, 5 Big Moves, and new place-based planning framework.

The implementation of this new planning framework will be critical in realising the 20-year vision for Pyrmont and as such this submission includes comments and recommendations intended to assist DPIE with the finalisation of the PPPS. In particular and relevant to the site, Celestino emphasises that the financial viability of planning controls applicable to the private land holdings in the Blackwattle

Bay sub precinct will be essential to unlocking this area for development. If development is not financially viable the sites will not be able to be developed nor any of the public benefits delivered, including the foreshore walk.

Celestino looks forward to opportunities to discuss how their landholding can contribute towards the delivery and success of the future growth of the Pymont peninsula and Blackwattle Bay.

This submission comprises the following sections:

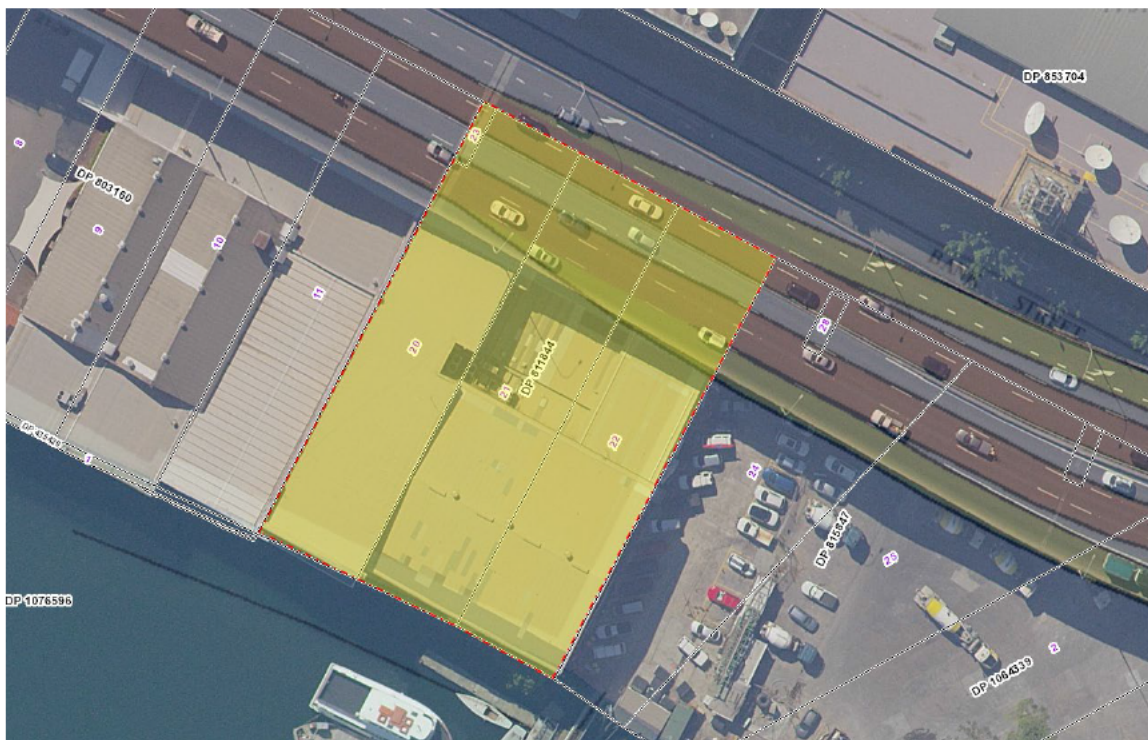
- **Section 1** – Brief description of the Celestino landholding;
- **Section 2** – Overview of the concept design for the site at 31-35 Bank Street Pymont;
- **Section 3** – Summary of Celestino's submission to the *Revitalising Blackwattle Bay* document;
- **Section 4** – Review and recommendations to the draft PPPS; and
- **Section 5** – Conclusion.

1. THE SITE

Celestino owns a significant landholding at 31-35 Bank Street, Pyrmont (refer **Figure 1**).

The legal property description of the site comprises (Lot 20, 21, and 22 in DP811844). The site has an area of 2,971 sqm, and frontages of 46 metres to Bank Street and Blackwattle Bay.

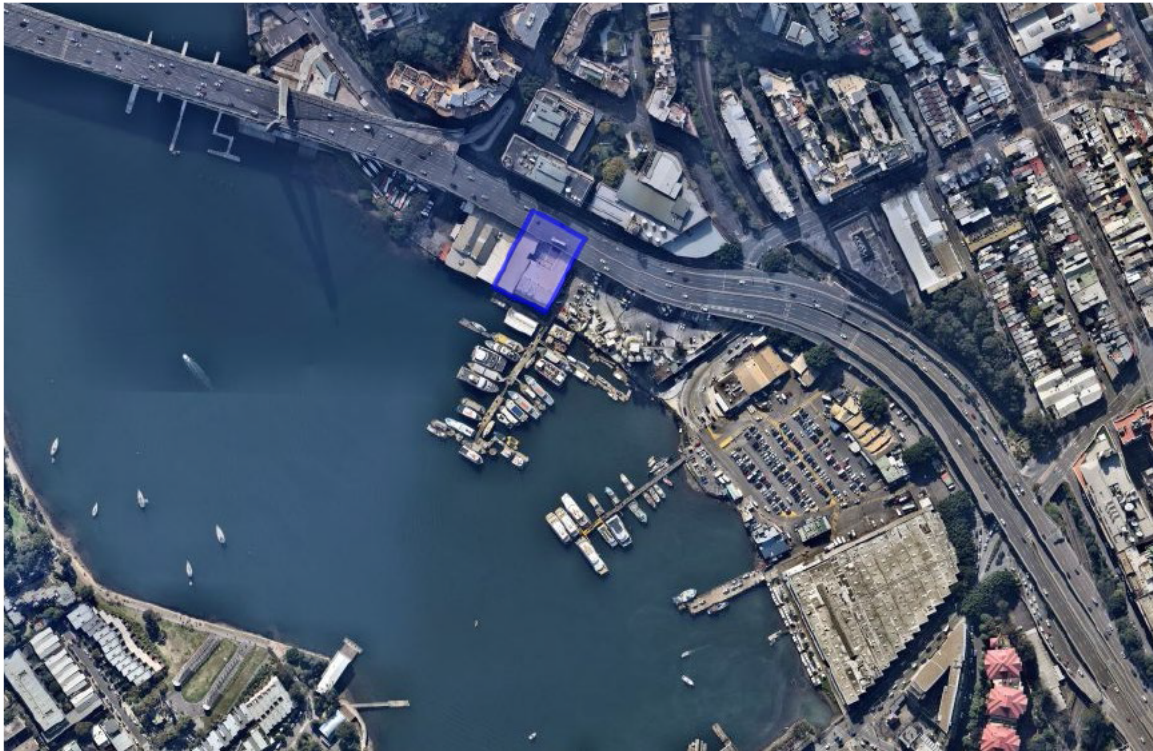
Figure 1 Site Location



Source: SixMaps

The site occupies a prominent location on the southern foreshore of the Pyrmont Peninsula at the western end of Blackwattle Bay (see **Figure 2**). The site is one of three private land holdings in the Blackwattle Bay precinct, with adjoining private land comprising the Poulos site to the west and the Hymix site to the east.

Figure 2 Surrounding Context



Source: NearMaps

2. CONCEPT PROPOSAL

Celestino and its architectural and urban planning team has completed a visioning exercise for future development opportunities and strategic planning positioning for its landholding at 31-35 Bank Street.

This submission takes the opportunity to signal to DPIE Celestino's vision to deliver a high-quality mixed-use tower comprising an activated /retail commercial podium and high-amenity residential accommodation. Redevelopment of this strategically positioned site at the head of Blackwattle Bay will make a significant contribution to a world class waterfront along the western fringe of the peninsula.

The concept design will deliver the following land use outcomes:

- Activated ground plane with retail and commercial uses (shops, cafés, restaurants etc) at street level fronting the waterfront promenade and through site link;
- Innovation, technology, and education land uses at podium level (associated with a new Sydney Science Park Satellite Innovation Hub);
- High quality leisure amenities with world class harbour views at upper podium levels;
- Residential apartments at upper levels (and above the level of the Anzac Bridge overpass); and
- Basement car parking.

3. SUBMISSION TO REVITALISING BLACKWATTLE BAY

The NSW Government is preparing a dynamic long-term planning framework to guide future growth of Blackwattle Bay. In May 2020, Infrastructure NSW (INSW) published a brochure entitled *Revitalising Blackwattle Bay* for public consultation. The brochure sought to facilitate community engagement on the future urban renewal of Blackwattle Bay and three potential development scenarios.

In June 2020 Celestino prepared a detailed submission to the public exhibition of the *Revitalising Blackwattle Bay* brochure. This introduced the concept proposal and demonstrated its alignment and ability to achieve key urban design and planning principles established for Blackwattle Bay, namely:

- As one of the three private landowners, contributing to a continuous waterfront promenade and the missing link to the 15 km Sydney Harbour Foreshore Walk from Woolloomooloo to Rozelle;
- Creating publicly accessible open space connections in the form of a new through-site pedestrian and cyclist way, linking the neighbourhood of the Pyrmont Peninsula to the waterfront;
- Creating new homes that support a vibrant and safe 24 hour place;
- Contributing new employment opportunities close to the CBD in an innovation precinct with the establishment of a Sydney Science Park Satellite Innovation Hub; and
- Creating an authentic place, building on the site's historical significance and local character, and activating the public domain.

4. DRAFT PPPS SUBMISSION AND RECOMMENDATIONS

Celestino has reviewed the exhibited draft PPPS and supporting material and identified the following matters and recommendations to inform the finalisation of the Pyrmont Peninsula Place Strategy.

4.1. CONSISTENCY WITH DIRECTIONS

The draft PPPS identifies 10 Directions that focus on matters of strategic, economic, social, and environmental significance to guide future growth of the Pyrmont peninsula to 2041. These Directions and the accompanying Structure Plan establish how growth and change could occur.

Celestino's concept proposal is capable of achieving and contributing to these Directions, outlined below.

Table 1 - Consistency with Draft PPPS Directions

Direction	Concept Proposal
<i>Direction 1 Jobs and industries of the future</i>	<ul style="list-style-type: none"> ▪ The Sydney Science Park Satellite Innovation Hub and commercial spaces in the upper floors of the large floor plate podium are spaces focused directly on activating start-ups, innovation jobs, and collaboration. ▪ Provides ground floor retail and hospitality jobs.

Direction	Concept Proposal
<i>Direction 2 Development that complements or enhances that area</i>	<ul style="list-style-type: none"> Promotes significant transformation of Blackwattle Bay by redeveloping existing 1970s warehouse buildings into modern and active employment, residential and public spaces including opening the foreshore to public access.
<i>Direction 3 Centres for residents, workers and visitors</i>	<ul style="list-style-type: none"> Introduces new public spaces, shops, and services to create smaller nodes of activity within Blackwattle Bay.
<i>Direction 4 A unified planning framework</i>	<ul style="list-style-type: none"> Delivers substantial urban renewal in alignment with the new statutory planning framework.
<i>Direction 5 A tapestry of greener public spaces and experiences</i>	<ul style="list-style-type: none"> One of only three private properties needing to be redeveloped to create a contiguous harbour foreshore parkland that provides for regional recreational and cultural uses and spaces for the local community.
<i>Direction 6 Creativity, culture and heritage</i>	<ul style="list-style-type: none"> Returns the foreshore to public access playing an essential role in delivering the Sydney Harbour foreshore walk as a continuous water-edge experience, connecting people to an understanding of place and of care for Country.
<i>Direction 7 Making it easier to move around</i>	<ul style="list-style-type: none"> Creates new and enhanced pedestrian connectivity between the foreshore and Pyrmont Village.
<i>Direction 8 Building now for a sustainable future</i>	<ul style="list-style-type: none"> Incorporates measures to support social and ecological resilience (including flood and sea level rise mitigation). Provides a new building designed to high environmental standards, net-zero water and energy targets and providing for flexibility and future adaptation.
<i>Direction 9 Great homes that can suit the needs of more people</i>	<ul style="list-style-type: none"> Deliver housing growth along the western side of the peninsula within the Blackwattle Bay sub-precinct being an area of high amenity including waterfront views and access, future ferry access, future metro station access and existing light rail station all in close proximity. The new housing provision can deliver diversity to suit different household sizes, configurations, and needs.

Direction	Concept Proposal
	<ul style="list-style-type: none"> ▪ Design can respond to ever changing working and living environments such as working from home arrangements experienced under COVID-19. ▪ Adopts sustainability measures to reduce environmental impacts and improve health and social outcomes.
<i>Direction 10 A collaborative voice</i>	<ul style="list-style-type: none"> ▪ Work with two tiers of government (local and state) and adjoining private landowners to deliver on important community outcomes such as the foreshore walk, pedestrian connectivity, and aesthetically attractive design outcomes.

4.2. CONSISTENCY WITH BIG MOVES

The PPPS vision is underpinned by five Big Moves that seek to unlock the future potential for renewal and transformation of the peninsula over the next 20 years. The Department is applauded for its recognition of these place-shaping aspirations that will contribute to the future success of Pyrmont.

Celestino's commitment to the realisation and success of the Big Moves is highlighted as follows.

Table 2 Alignment with Big Moves

Big Move	Celestino Commitments
<i>A world-class harbour foreshore walk</i>	<p>Celestino acknowledges the essential role the site will play in the delivery of the harbour foreshore link. Celestino's concept proposal incorporates a substantial waterfront setback to accommodate the promenade and pedestrian and cyclist movements and stimulate waterfront-facing outdoor dining opportunities associated with retail/restaurant/café uses.</p> <p>As detailed in Section 4.5 of this submission, the successful delivery of the foreshore walk on the private landholdings is contingent on a suitable planning framework, that delivers on economically sustainable and feasible outcomes in relation to land use and development parameters (density, height, floorplates, setbacks etc).</p> <p>Celestino acknowledges that DPIE may be investigating a floating boardwalk around the boundary of the private landowner sites and is supportive of the concept. A floating boardwalk will further increase the ability for the site to deliver great open and urban spaces.</p>
<i>A vibrant 24-hour cultural and entertainment destination</i>	<p>The concept proposal incorporates an activated ground plane that will contribute a range of retail and commercial offerings (restaurants, cafés, bars etc) and that will attract residents, workers, and visitors and contribute to a vibrant 24-hour economy within walking distance.</p> <p>Essential to the activation of a 24-hour economy will be local residents living within the area which the concept proposal will go some way to accommodating on the upper floors.</p>
<i>Connect to Metro</i>	<p>The provision of a new Metro station is a critical piece of infrastructure that will facilitate economic growth and transform Pyrmont into an innovative, creative, and cultural precinct and an engine room of the Eastern Harbour CBD. Celestino's site would provide substantial and positive benefits to a new Metro station insofar as it would attract significant economic growth and investment in Blackwattle Bay and heighten the profile of the precinct as an emerging commercial, entertainment, and residential destination.</p>

Big Move	Celestino Commitments
<i>Low-carbon, high-performance precinct</i>	The location of Celestino's site is ideally suited to facilitating a low-carbon high-performance sustainability development and encouraging high rates of walking and cycling, low rates of car use, and enhanced public transport connections, including the proposed new Sydney Metro station, new ferry terminal, and existing light rail station all in close proximity.
<i>More, better and activated public space</i>	The street levels and ground plane around Celestino's site beneath the Western Distributor overpass has the potential to contribute to a range of active uses that make a positive contribution to the public domain. Unlocking the foreshore for public use will be a key outcome.

4.3. BLACKWATTLE BAY KEY SITE - LAND USE MIX

The draft PPPS identifies Blackwattle Bay as one of four 'key sites' in Pyrmont where future growth will accelerate job creation and economic activity and provide the impetus for the 'Big Moves' to integrate the peninsula with the wider Sydney Harbour foreshore. The Blackwattle Bay sub precinct is earmarked as a new urban quarter and place of metropolitan significance, contributing new jobs, homes, creativity, and learning, in conjunction with new open spaces and pedestrian connections.

Maximum building heights up to RL156m have been indicated for the Blackwattle Bay sub precinct which is appropriate given this is the only undeveloped brown field development area on the peninsula and accordingly is capable of delivering the greatest change and benefits.

DPIE is commended for embracing a bold yet sensible approach to growth in the peninsula, identifying key sites such as Blackwattle Bay for future growth and urban renewal. These sub-precincts present significant opportunities to harness new investment and associated public benefit connections.

Celestino endorses Blackwattle Bay as a key site earmarked for urban renewal and transformation and supports strategic priorities and place-making principles identified for the sub-precinct, including:

- Transformation from industrial and infrastructure to a place attracting businesses and employees, new permanent residents, visitors, and tourists along the connected waterfront.
- Urban design analysis guidance that precincts such as Blackwattle Bay have best capacity for growth and change over the next 20 years, whilst protecting local character and public spaces.
- Future provision of a new Metro station to catalyse the transformation of the precinct into a new urban quarter and tourist destination and as a place of renewal and metropolitan significance.
- Redevelopment and economic growth to focus on job creation and supporting the cultural and entertainment offerings of the waterfront through a public promenade and event and function uses. However, this must not be to the exclusion of creating new waterfront living opportunities which play an important role in the activation of the area and the financial feasibility of delivering not only the developments themselves, but the public benefits expected to be delivered by proponents.
- Release of significant parcels of land in conjunction with privately-owned sites (such as Celestino's site) to accommodate a large portion of the peninsula's anticipated growth forecast.

- Significant public domain improvements along the Blackwattle Bay foreshore to create a key linkage between the new Sydney Fish Market to the Western Harbour, Walsh Bay, and beyond.

Celestino takes this opportunity to underline the consistency of its concept design proposal with these strategic priorities and place-making principles for Blackwattle Bay, as summarised below:

- The proposal represents a significant opportunity to unlock a private landholding and integrate commercial and residential uses within a high quality and high amenity architectural design.
- Mixed use redevelopment will contribute to the evolution of Blackwattle Bay as an emerging urban quarter focused on employment, innovation, and visitor activities within a 24-hour environment.
- The proposal can make an essential contribution to the creation of a world class waterfront, completing the missing link Sydney Harbour foreshore walk from Woolloomooloo to Rozelle.
- The ground plane retail and podium level commercial uses will promote economic activation and viability and contribute towards meeting the forecast growth of 5,770 jobs in Blackwattle Bay.
- The site is within an indicative zone identified for economic innovation. The proposal includes a Sydney Science Park Satellite Innovation Hub in podium levels that will drive start-ups, innovation jobs, and collaboration and contribute to the peninsula's participation in a global economy.
- The innovation hub will form part of a truly unique collaborative and connected economic and employment corridor between Pyrmont and other evolving innovation districts within the city.
- The concept design does not overshadow existing and future open space, including Wentworth Park, the western foreshore, or any new open space created in major development sites.
- The proposed landscaped through-site link on the eastern boundary of the site will activate the waterfront promenade and encourage pedestrian connectivity to and from Pyrmont.
- The residential apartments will be high amenity and complement the attractiveness and quality of Blackwattle Bay as a place for commercial or entertainment uses.

Recommendations

Celestino encourages DPIE to reinforce the catalytic role of Blackwattle Bay in the economic growth and transformation of this key site into a new urban quarter and maintain the emphasis on renewal, job creation, and economic activity of the precinct over the next 20 years.

The successful realisation of the future vision for Blackwattle Bay and delivery of significant public benefits (including the waterfront promenade) is contingent on the implementation of an appropriate planning framework. DPIE is strongly encouraged to adopt an appropriate land use planning and built form controls for Blackwattle Bay (in relation to land use mix, density, building height, and floorplate sizes) to ensure that future development opportunities are economically feasible and sustainable.

We strongly recommend for the PPPS to facilitate future planning and development controls that encourage investment, commercial viability, and futureproof flexibility. The size and location of the site and adjacent two privately owned sites do not provide sufficient floor plates to accommodate a modern commercial building. It is essential that these sites be zoned to allow residential uses on all floors above the podium and that the residential tower floor plate sizes are practical being no less than 1000 sqm in GFA per floor wherever possible.

Other areas in Blackwattle Bay, namely the government land, are more suited to commercial / employment land uses with greater scope for larger commercial floorplates in proximity to the new Metro station and attractiveness to a greater range of tenants in an innovation precinct.

4.4. RESIDENTIAL LAND USES

The draft PPPS forecasts the growth of 2,055 people in Blackwattle Bay by 2041. This position is supported by Celestino who recognise that key sites such as Blackwattle Bay are best placed to accommodate future population growth through mixed use and high-density housing options with good access to public transport and to existing and future employment opportunities, infrastructure, and services. Blackwattle Bay is an ideal location for new housing supply, diversity, choice, and quality.

A key strategic policy position of the draft PPPS is targeting housing growth primarily along the western fringe of the peninsula, including the Blackwattle Bay sub-precinct. Celestino endorses this position to an extent, however the draft PPPS noticeably falls short on recognising the potential for private landholdings within key sites to meet the housing demands of the projected population growth.

The strategic planning framework embedded in the PPPS should be strengthened to acknowledge that the identified private landholdings in the north-western portion of Blackwattle Bay (including Celestino's site) are well placed to meeting future housing growth in the peninsula. By virtue of their size, configuration, and single-ownership, these landholdings are capable of making a substantial contribution to delivering new housing and accommodating the forecast population growth.

It is anticipated that the underlying demand for new dwellings in key sites such as Blackwattle Bay will be strong over the next twenty years and beyond. **The PPPS should afford greater recognition that precincts such as Blackwattle Bay are best placed to accommodate population growth given access to public transport and employment opportunities, infrastructure, and services. Substantial single-owner landholdings, such as Celestino's site, are ideally suited to delivering high quality residential offerings.**

4.5. SYDNEY HARBOUR FORESHORE WALK

As one of the key peninsula-wide directions and a Big Move, the draft PPPS signals the creation of a world class Sydney Harbour foreshore walk incorporating uninterrupted pedestrian access and linkage between Walsh Bay and the new Sydney Fish Market. **The foreshore walk will create a unique and enviable public open space and walking and cycling connections for tourists and visitors and new recreation opportunities for residents.** The two final links required to complete the foreshore promenade are located between Jones Bay Wharf and Darling Island in the Darling Island sub-precinct and a new promenade as part of the revitalisation of Blackwattle Bay (see Figure 3).

Figure 3 Sydney Harbour Foreshore Final Links



Source: Draft PPPS

Sustainable Sydney 2030 was adopted by the City of Sydney in 2007 as a program for the sustainable development of the city to 2030 and beyond. Sustainable Sydney 2030 is a set of goals to help make Sydney green, global and connected. Sustainable Sydney 2030 includes a plan for a Liveable Green Network made up of streets and lanes with pedestrian priority. Ten green corridors were proposed across the City linking the villages and hubs to provide safe and attractive paths.

The “Connected City” was an aspiration of large City economies dependent on the mobility of people, products and ideas. Jan Gehl’s Public Spaces, Public Life Sydney Study of the City Centre made a series of recommendations to transform the City Centre into a hub for pedestrians and cyclists.

The **Sydney Harbour Foreshore Walk** is an idea contained within the **Sustainable Sydney 2030**, and dates back to before the *Sydney Harbour Catchment Regional Environmental Plan 2005* and Sydney Harbour Foreshores Area DCP brought together policies related to the management of Sydney Harbour and its foreshores and tributaries.

The Sydney Harbour Foreshore Walk aims to provide Sydneysiders and visitors with a continuous 15 kilometre foreshore walk from Glebe to Rushcutters Bay connecting many of the City’s cultural attractions and destinations such as the Fish Markets and the Circular Quay weekend markets. The walk will link with the City Centre, the Cultural Ribbon and Eora Journey Indigenous cultural interpretation walk of City landmarks, from Mrs Macquarie’s Chair to Redfern.

The idea of a waterfront promenade was expressed as one the Bays Precinct's Destinations from Pyrmont to the CBD that will restore visual and physical links to Sydney Harbour. Publicly available documentation explained this waterfront promenade was full of activity night and day with people enjoying a mix of 'pop-ups' or events alongside permanent restaurants, small bars, cafés, garden areas or on the waterways. The Bays Waterfront Promenade was expressed as an essential connector within The Bays Precinct and should be planned as a new must-see destination for visitors to Sydney; a waterfront playground to bring communities together.

The key features of the Bays Waterfront Promenade were:

- 5.5 kilometres of continuous public foreshore access;
- Staging public access to previously excluded areas;
- Starting with Stage 1, linking Blackwattle Bay to Pyrmont, as part of the Bays Market District;
- Providing benefits for existing and future businesses exposed to new pedestrian trade;
- Reconnecting Balmain to Pyrmont by working towards the adaptive re-use of Glebe Island Bridge;
- Increasing visual and physical links to Sydney Harbour and The Bays Precinct; and
- Providing a mix of green shorelines and living sea walls.

It is clear that completing the foreshore walk is one of the most important public outcomes that will be delivered in Sydney over the coming 20 years. Currently the site and adjacent two privately owned landholdings are actively used by their owners for industrial purposes with aging, but substantial buildings, plant and equipment located on these properties. To unlock these properties for redevelopment including turning over foreshore land for public access it is fundamental that there be a financial imperative for the landowners to do so.

It goes without saying that if new planning controls do not allow sufficient height, sufficient floor plates, appropriate land uses on relevant levels, and overall FSR, owners will be placed in a position where they have no reason to change the status quo. Smart planning is required to facilitate redevelopment of the site and adjoining land and fill in the missing link in the Sydney Harbour Foreshore Walk.

Celestino embraces the tangible economic and community benefits of establishing an uninterrupted waterfront promenade along the foreshore to create a new global destination for Greater Sydney and is supportive of the key strategic priority to secure the final links of the foreshore walk. The realisation of this foreshore pedestrian linkage at Blackwattle Way will activate the western fringe of the Pyrmont peninsula and create high amenity open space and waterfront access for recreational, commercial, and cultural uses.

Celestino's concept design proposal can make a significant contribution to the final link through Blackwattle Bay and the delivery of a Big Move. The proposal incorporates a 10 metre setback from the waterfront (mean high watermark) to accommodate the promenade and pedestrian and cyclist movements and stimulate waterfront-facing outdoor dining opportunities associated with ground plane retail/restaurant uses.

The draft PPPS acknowledges that the creation of the waterfront promenade represents a significant placemaking outcome that can only be secured through collaborative partnerships between the NSW Government, the City of Sydney, businesses, the community, and private landowners. **As one of the three sites under private land ownership within Blackwattle Bay, Celestino acknowledges the potential contribution of the site to the delivery of the Harbour foreshore link. Subject to a supportive framework Celestino is committed to early delivery of the site and the promenade.**

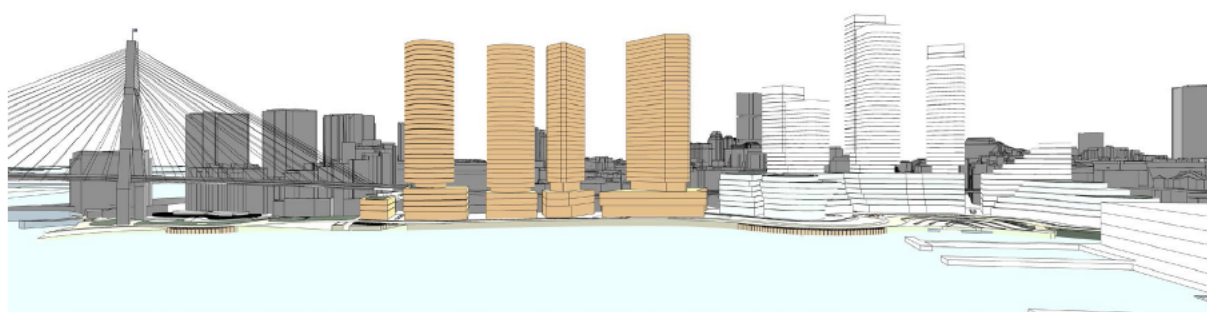
Figure 4 and **Figure 5** illustrates the Revitalising Blackwattle Bay vision with redevelopment of the private landholdings, including the 31-35 Banks Street site, and achievement of a continuous Sydney Harbour Foreshore Walk through Blackwattle Bay, one of the Big Moves in the PPPS.

Figure 4 Plan of Revitalising Blackwattle Bay Vision “Balanced Scenario” with redevelopment of private landholdings



Source: *Revitalising Blackwattle Bay*, INSW

Figure 5 Indicative 3D perspective of Revitalising Blackwattle Bay Vision “Balanced Scenario” with redevelopment of private landholdings



Source: *Revitalising Blackwattle Bay*

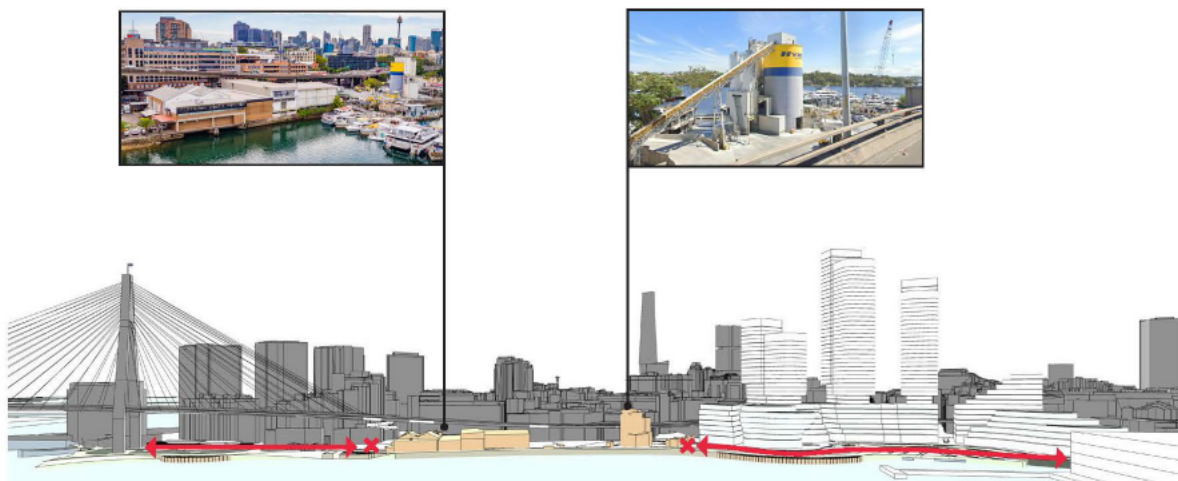
Figure 6 and Figure 7 illustrates the Revitalising Blackwattle Bay vision by INSW (“Balanced” scenario) with existing development retained on the private landholdings and without the final link for the continuous Sydney Harbour Foreshore Walk through Blackwattle Bay.

Figure 6 Revitalising Blackwattle Bay Vision “Balanced Scenario” without redevelopment of private landholdings



Source: Bates Smart

Figure 7 Indicative 3D perspective of Revitalising Blackwattle Bay Vision “Balanced Scenario” without redevelopment of private landholdings



Source: Bates Smart

Recommendations

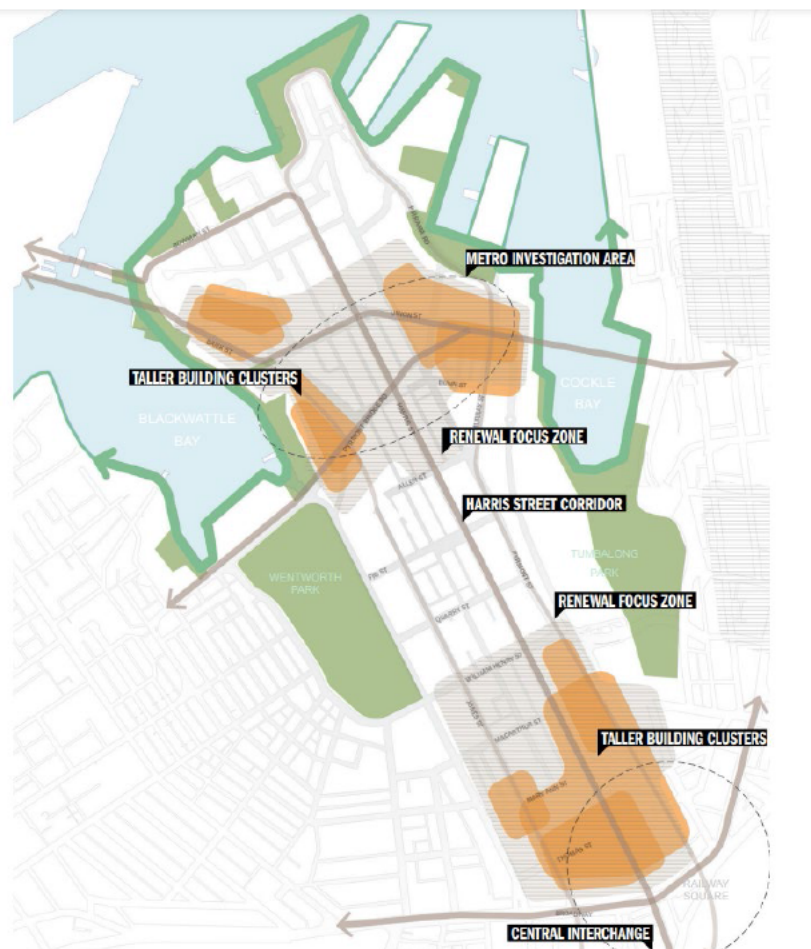
It is requested that DPIE foster a collaborative approach with private landowners in order to unlock foreshore land and ensure the successful delivery of the missing link to the Sydney Harbour waterfront promenade.

We ask that DPIE acknowledge that the tangible economic and community benefits of an uninterrupted waterfront promenade along the Blackwattle Bay foreshore is reliant upon site-specific proponent-led developments. Future redevelopment of private landholdings and the unlocking of key locations along the foreshore will be contingent on economically feasible proposals, commensurate with a suitable planning framework in relation to land use and urban design controls and built form parameters (density, building height, floorplates, setbacks etc).

4.6. TALL BUILDING CLUSTER

The Structure Plan contained in the draft PPPS Strategic Framework identifies indicative renewal zones and tall building clusters within Pyrmont (extract shown at Figure 8).

Figure 8 - Draft PPPS Indicative Renewal Zones and Taller Building Clusters



Source: Draft PPPS Strategic Framework

The Structure Plan contained in the draft PPPS Strategic Framework identifies an indicative taller building cluster in the north-west portion of the peninsula, generally bound by Bank Street, Miller Street, and Quarry Master Drive. Any additional height in this location must not impact on the development potential of the private landholdings south of Banks Street, including the Celestino's site. The nomination of tall buildings in this location must adhere to sun access plane requirements and provide diversity of building heights, as has been suggested in the draft PPPS.

The indicative taller building cluster fails to acknowledge that the private landholdings (including the site) were identified in the consultation document Revitalising Blackwattle Bay as a location for tall buildings. It is noteworthy that all three scenarios, "Housing", "Jobs" and "Balance", identified tall buildings for the private landholdings.

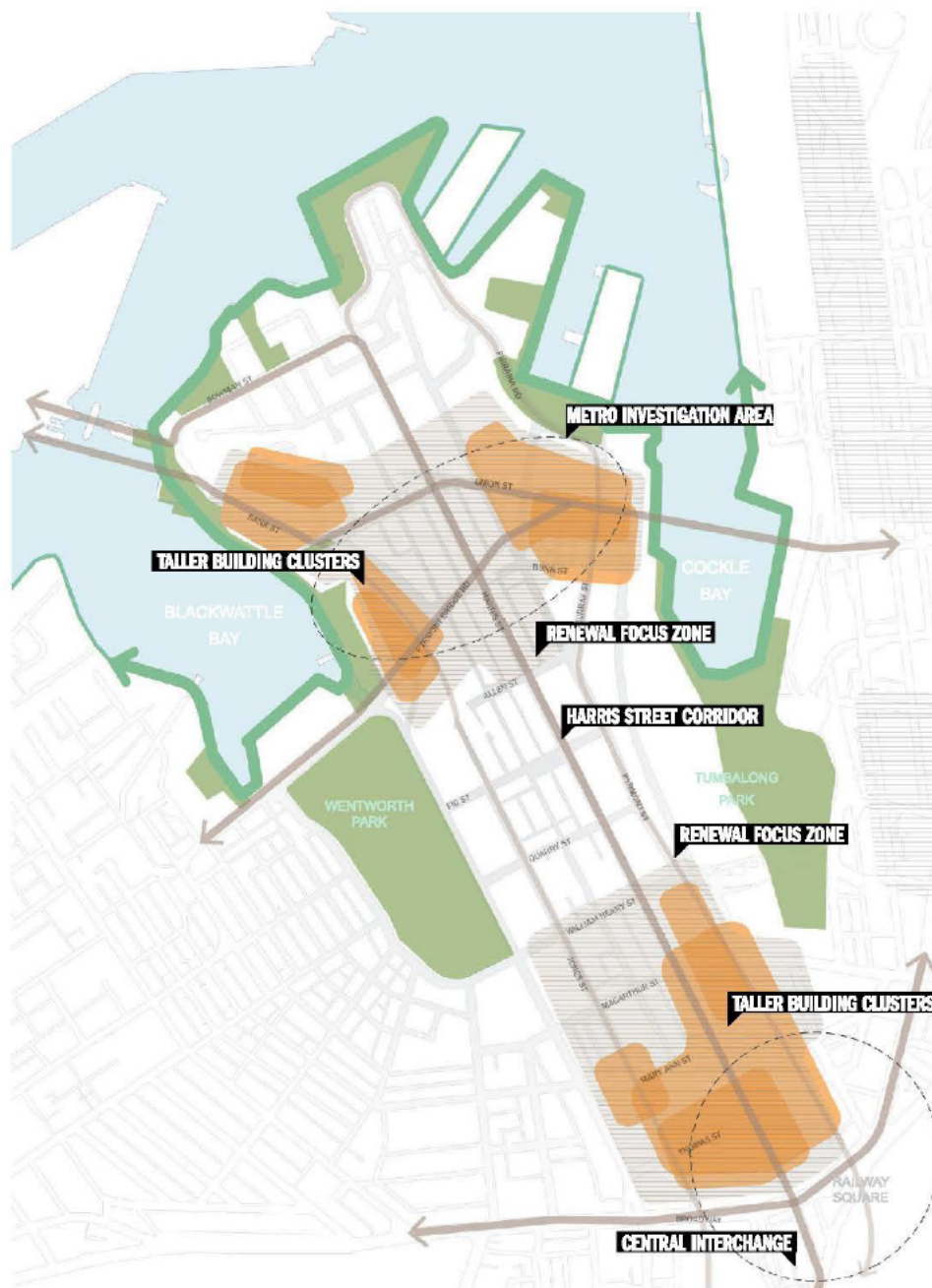
The extension of this indicative tall building cluster to land on the southern side of Bank Street (including Celestino's site) represents a consistent and logical approach to the future growth of the peninsula that envisages significant transformation and urban renewal on key sites, such as Blackwattle Bay. The future growth of Blackwattle Bay will accelerate job creation and economic activity and provided the impetus for the 'Big Moves' to integrate the peninsula with the wider Sydney Harbour foreshore.

The precinct is earmarked as a new urban quarter and place of metropolitan significance, contributing new jobs, homes, creativity, and learning, in conjunction with new open spaces and pedestrian connections. These ambitions should be reflected in the indicative areas for tall building clusters.

Blackwattle Bay presents a clear opportunity for high density development, including taller buildings, in order to harness new investment and delivery public benefit. We recommend that the PPPS Structure Plan acknowledges the suitability and capacity of land to the south of Bank Street to achieve high density development commensurate with taller buildings, where it is supported by robust urban design analysis and can deliver acceptable amenity and design excellence outcomes.

It is requested that Figure 9 replace the Indicative Renewal Zones and Taller Building Clusters in the Draft PPPS.

Figure 9 Requested revision to Indicative Renewal Zones and Taller Building Clusters



Source: Bates Smart

4.7. METRO STATION

The 20-year vision for Pyrmont as embedded into the draft PPPS is contingent on the provision of a new Metro station as part of the Sydney Metro West line linking the Sydney CBD with Parramatta via Sydney Olympic Park. The provision of a new Metro station is declared as a 'Big Move' to unlock the potential of Pyrmont and enhance its attraction as a complementary economic space to the Sydney CBD, linking opportunities for new economy jobs and arts, entertainment, and cultural activities.

The draft PPPS Structure Plan presents an indicative investigation area for the potential location of a new Metro station, generally extending between Blackwattle Bay and Pyrmont foreshore (as below).

Figure 10 Metro Investigation Area



Source: Draft PPPS

Recommendations

The provision of a new Metro station in Pyrmont is a critical piece of infrastructure that will facilitate future economic growth and enable the realisation of the 20-year vision to transform the peninsula into an innovative, creative, and cultural precinct and an engine room of the Eastern Harbour CBD.

Celestino registers its strong preference for the new station to be delivered in Pyrmont.

4.8. PUBLIC BENEFIT OPPORTUNITIES

A key tenet of the draft PPPS is to harness public benefit opportunities from the new investment and economic transformation of the peninsula. Taking into account the physical constraints of significant parts of Pyrmont, the draft PPPS identifies the sub-precincts and key sites (such as Blackwattle Bay) as having the greatest capacity to catalyse economic growth and unlock public benefit opportunities.

The peninsula-wide additional public benefit opportunities towards which key sites can contribute are:

- to deliver in whole, or in part, one or more Big Moves;
- to bring forward the delivery of critical unfunded, or precinct scale, infrastructure beyond the growth infrastructure requirements necessary to support the scheme;
- to connect and activate the public domain through new active transport connections through large sites, reinstate views to the harbour and deliver superior street and place activation; and
- to provide opportunities for affordable workspace for creative industries, cultural.

The draft PPPS sets out the additional public benefit opportunities for Blackwattle Bay as follows.

Opportunities for additional public benefits	Special considerations
<ul style="list-style-type: none"> ▪ deliver the Miller Street project to connect to the Light Rail station. ▪ deliver the 'low-line' beneath the Anzac Bridge pylons and Western Distributor overpass, including a ribbon of activated, public open and recreational space, including formalised recreational boat facilities for Dragon Boats. ▪ delivery of cultural and/or entertainment floorspace for recreation, meetings, events, and new attractions. 	<ul style="list-style-type: none"> ▪ Sun access plane not breached, diversity of building heights with upper ranges limited to RL120 – RL 156 (Obstacle Limitation Survey). ▪ Prioritisation of the delivery of employment floorspace.

Recommendations

Celestino acknowledges and supports the draft PPPS principles of public benefit delivery, being:

- **Transparency** – being clear and consistent on how key sites can deliver public benefits.
- **Equity** – any additional private gain must be appropriately balanced against the public benefit and be secured in the long term (i.e. in perpetuity).
- **Probity** – the process is clear, transparent, and accountable to the Place Strategy, which identifies the Big Moves and additional public benefit from a place-based approach.

The redevelopment of the site has the potential to contribute the following public benefit outcomes to the peninsula over and above the necessary infrastructure required to support growth:

- Contribute to securing the final links of the Sydney Harbour foreshore link (a Big Move); and
- Enhance connectivity to Blackwattle Bay and activate the public domain through shared spaces that encourage outdoor dining and contribute to a vibrant 24-hour destination (a Big Move).

Notwithstanding, it must be acknowledged that the delivery of public benefit outcomes such as the Big Moves listed above are conditional on proponent-led proposals on private landholdings. For instance, redevelopment of Celestino's site to secure the final links of the foreshore link and contribute to the activation of the public domain and a vibrant 24-hour destination is contingent on an appropriate planning framework that facilitates economically feasible and commercially viable development.

We support an approach whereby the DPIE foster collaboration to achieve the benefits of strategically located private landholdings and enabling public benefits opportunities. The PPPS should embed a collaborative approach between DPIE, the City of Sydney, and private landowners to establish the framework and principles for coordinating and aligning site-specific proponent-led developments with the delivery of additional public benefits.

Celestino supports the commitment to investigate and pilot new and innovative funding mechanisms to secure additional public benefits, such as a local contribution regime and direct negotiations with private landowners. Furthermore, Celestino advocates for a clear and transparent mechanism for identifying the public benefits to which developers must contribute in order to provide clarity and certainty to investment decisions.

Celestino recommends that the PPPS should include the principles of development uplift incentives associated with public benefit opportunities. Such incentives could include the award of additional gross floor area and/or building height to development which integrates additional public benefit of exceptional value or outcome and are aligned to the Big Moves of the PPPS.

4.9. FUTURE PLANNING FRAMEWORK

Celestino make the following comments and recommendations for the future planning framework:

- **Support a consistent and unified planning framework** for the Pyrmont Peninsula that provides a clear planning approval pathway for all development and clarifies the relevant planning authority that reflects the State significance of Pyrmont revitalisation, in order to reduce complexity and provide certainty.
- The exhibition materials suggest the sub-precinct master plans will be prepared and placed on public exhibition by the end of 2020 and will outline the detailed planning, design, and development requirements to implement the Place Strategy. **In order to maintain momentum in the planning process it is essential for the public exhibition milestone of sub-precinct master plans and draft planning controls is achieved.**
- **Support for clarification of maximum GFA and building height controls** that must be met in preparing master plans, planning proposals, or development applications.
- **Support for development in Key Sites to be administrated under the State Significant Planning Framework** with development proposals for construction assessed as either a State Significant Precinct or State Significant Development, with the Minister for planning as the consent authority.
- **Zoning and permissibility, development standards and controls must be based on an evidence based economic development strategy, where the controls (land use mix, height of building, FSR, setbacks, floorplate size etc) enable economically sustainable and feasible development.**
- **Support for the principles of development uplift incentives associated with public benefit opportunities.** Such incentives should include the award of additional gross floor area and/or building height to development which integrates additional public benefit of exceptional value or outcome and are aligned to the Big Moves of the PPPS.

5. CONCLUSION

Celestino is supportive of the strategic planning policy direction embedded in the draft PPPS and looks forward to the successful realisation of the 20-year vision to transform the Pyrmont Peninsula, incorporating the recommendations contained in this submission, that meets the aspirations of the business, industry, visitors, local and future residents.

Celestino is planning significant investment on its site at 31-35 Bank Street and recognise the value of contributing to a clearly articulated vision and strategic planning framework in collaboration DPIE, other government agencies, and adjacent private landowners.

Celestino is committed to an ongoing collaborative process in the preparation and implementation of the PPPS and future planning controls for Blackwattle Bay. Celestino is committed to early delivery and activation the site including the foreshore link. However, this is contingent on an appropriate planning framework that facilitates economically feasible and commercially viable development

We acknowledge the effort to prepare such a detailed and significant place-making plan and thank DPIE for the opportunity to respond the exhibition of this Strategy. Celestino would welcome the opportunity contribute and collaborate further to its preparation and finalisation.

If you have any questions, please do not hesitate to contact Murray Donaldson on (02) 8233 9953.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Murray Donaldson", with a stylized flourish at the end.

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