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### **Draft Pyrmont Peninsula Place Strategy**

In response to the invitation for public comment, the National Trust of Australia (NSW) is pleased to provide this submission on the Draft Pyrmont Peninsula Place Strategy (Draft PPPS).

#### **The Trust believes a place strategy for Pyrmont Peninsula should:**

- **conserve and respect the heritage and character of the Pyrmont area**
- **promote new development that enhances and does not overwhelm or detract from the heritage character of the Pyrmont Peninsula**
- **optimise solar access to the public open spaces and the waterfront**

The Trust commend the excellent supporting document *Pyrmont Place Strategy – Non-Indigenous Cultural Heritage Study* prepared by GML Heritage. The Trust supports the Masterplan Principles recommended in this document.

The Trust support the government's ambition to return the whole of Wentworth Park to public use, in particular for public open space, when the Greyhound Racing NSW lease ends in 2027. We also support the recent government decision to retain the Powerhouse Museum at Ultimo and we agree with the PPPS (p.10) that the Museum can grow "as a key cultural asset and anchor for the education and creative industries in the area" as part of the Innovation Corridor.

#### **Glebe Island Bridge**

The Trust notes that the number 1 item in the "Five Big Moves" outlined in the Pyrmont Peninsula Place Strategy is to "Build and link a world class foreshore". The Trust supports the restoration and reactivation of the historic Glebe Island Bridge as an active transport link, and a vital component of any effort to "link a world class foreshore". This bridge, completed in 1903 and listed on the State Heritage Register, should form a key part of any works to improve the amenity of the Pyrmont peninsula. Both Pyrmont and Glebe Island Bridges were electrically operated and could swing in 44 seconds, much faster than contemporary bridges in the world.<sup>1</sup>

Today, Pyrmont Bridge serves as a strategic link to the CBD despite initial attempts to demolish the structure as part of the Darling Harbour redevelopment in the late 1980s. Similarly, its twin possesses equal value as a strategic transport link from Glebe Island to the city. The Glebe Island Bridge's role as one of the five bridges route to the north west will once again become critical with the urban renewal of the Bays Precinct.

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<sup>1</sup> Glebe Island Bridge, State Heritage Register Listing, <https://www.heritage.nsw.gov.au/search-for-heritage/search-for-nsw-heritage/>



### **“Place Making” and the existing character of the Pyrmont Precinct**

Place-making as it is more universally applied, and in particular in the US and the UK, refers to a bottom-up process that emphasizes collaboration and community participation to improve the liveability of towns and cities. The desired outcome being great places for people to live, work and play. Its broader objectives are on delivering “place character”, community participation and economic revitalisation.<sup>2</sup>

The Draft PPPS (p.27) endorses a place making approach:

*“By adopting a place-making approach, we describe the future character of each sub-precinct and potential actions or interventions to achieve this future character. This will include recognising the value public spaces, character and connectivity contribute to economic development.”<sup>3</sup>*

As stated in the announcement for the formation of the Placemaking NSW Advisory Committee on 16 July 2020, the NSW Government’s application of ‘place-making’ is primarily driven by economic development:

*“This is an exciting opportunity to bring together the best private sector expertise with the foremost experts in the Department to set a strategic vision that delivers places that drive growth and investment opportunities, and delight the people who inhabit them right across NSW.”<sup>4</sup>*

In an article that appeared in the September 2015 edition of the *New Planner: the journal of the NSW planning profession* the Hon Rob Stokes MP described placemaking:

*“With community-based participation at its core, an effective placemaking process capitalises on a local community’s assets and potential. This results in public spaces being created that contribute to people’s health, happiness and wellbeing.”<sup>5</sup>*

#### **At its core, placemaking seeks to build on existing character, meaning and identity – something that**

**Pyrmont can offer in abundance.** The Urban Design Analysis supporting the Draft PPPS describes a process of assessment ascertaining where and how, growth and change could occur, while protecting heritage and open space, and giving consideration to connectivity, and sunlight for existing and new and open spaces, existing residents and the harbour foreshore. These findings were then analysed against demand identified in the draft EDS under each scenario to assess whether the type and quantum of floorspace can be accommodated.

The vision for the draft PPPS (p.25) includes:

*“A variety of building typologies will deliver high quality design, from a range of taller buildings complementing the character and heritage of the area to smaller-scale urban warehouses and innovatively re-used heritage buildings.”*

A building of 45-51 storeys does not complement the Pyrmont Peninsula heritage character, or the overall low to medium rise character across the peninsula (with noted recent intrusions and exceptions at Jacksons Landing and Darling Harbour).

It is unclear in the Draft PPPS how the heights proposed at the key sites relate to community participation and existing character. As described by Steve Driscoll in the PPPS webinar, the framework of the key sites allowed the DPIE to align the proposals and the aspirations of the key sites with the place-based strategy. It is unclear from where the aspirations for the key sites are derived. According to the Phase 1 Engagement Report (June 2020) the 10 Directions were already established prior to community consultation.

The Trust notes that the feedback from the *Engagement Report* noted that “jobs and industries in the future” were ranked as the least important PPPS direction, while “development that complements and enhances the area” and “greener spaces” were the most important.

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<sup>2</sup> Legge, Kylie. “The evolution of placemaking – what’s next?”, *New Planner: The journal of the NSW planning profession*, Issue 104, September 2015, p.4. (<https://www.planning.org.au/documents/item/6981>)

<sup>3</sup> Draft Pyrmont Peninsula Place Strategy, 2020, p.27

<sup>4</sup> Stokes, R. (Ministerial Media release) “New focus on placemaking in NSW”, 16.07.2020 <https://www.planning.nsw.gov.au/News/2020/New-focus-on-placemaking-in-NSW>

<sup>5</sup> Stokes, R., “Planning for places in the harbour city”, *New Planner: The journal of the NSW planning profession*, Issue 104, September 2015, p.9 <https://www.planning.org.au/documents/item/6981>



No.	PPPS Direction	Ranked as “very important”
1	Jobs and industries of the future	27%
2	Development that complements or enhances that area	64%
3	Centres for residents, workers and visitors	37%
4	A unified planning framework	43%
5	A tapestry of greener public spaces and experiences	64%
6	Creativity, culture and heritage	41%
7	Making it easier to move around	57%
8	Building now for a sustainable future	31%
9	Great homes that can suit the needs of more people	37%
10	A collaborative voice	32%

Table 1: Summary of feedback as outlined in Engagement Report

### **Floorspace**

The draft PPPS presumes that the only way to deliver the required future floorspace is through high rise clusters in the key sites and select sub-precincts. The EDS while mentioning commercial feasibility in its table of contents does not actually go into detail or the necessity for a specific height or building type to provide the economic feasibility and desired profit to stimulate new development. Other building typologies that transition in scale and better relate to the mass, scale and form of existing heritage and character buildings may be able to deliver on the future floorspace. In this scenario, new floorspace is not required in clusters but could be spread across the precincts. The economic and commercial feasibility of alternatives with a better urban design outcome should be investigated.

### **Building Heights**

An analysis of the feedback made on the 10 Directions as outlined in the Engagement Report shows a key focus on building on the existing character of the area. As the Engagement Report states:

*“Respondents’ key concerns centred on large developments, particularly those involving high-rise buildings and high density living.”<sup>6</sup>*

The ten recommendations to Government listed in the economic strategy to support the growth of the Pyrmont Peninsula are commendable and are achievable in a way that is in sympathy with the existing scale and character of the area. There are a number of ways to achieve the above outcomes, while still delivering an “innovative, creative and cultural precinct”.

The *Pyrmont Peninsula Economic Development Strategy* provides estimates for the future demand of residential and commercial floor space up to 2041, and therefore, the justification for increased building height on the Pyrmont Peninsula.

The Trust recommend that:

- heritage should be the basis for creating a future vision and a great place of villages on the Pyrmont Peninsula
- there should be no increase in height of the buildings on the waterfront
- planning and development on the Peninsula should be managed and assessed by the City of Sydney

<sup>6</sup> Pyrmont Peninsula Place Strategy, Phase 1 Engagement Report, June 2020, p.13 <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Pyrmont-Peninsula-early-engagement-report-2020-06-29.pdf?la=en>



The Urban Design Analysis did not show any building height assessment, shadow diagrams, impacts on key view corridors and interface responses with character areas of only one to five storeys. These were all issues that were raised in the assessment of the Star Casino Tower proposal in 2019 by Department of Planning staff.

While the Urban Design Analysis does mention an indicative height strategy has been developed, it does not provide detail of how this strategy applies to the key sites and their recommended heights, other than to state:

*The indicative height strategy has been developed to allow for new buildings while:*

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

It also states that solar access planes will be 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.

**The assessment and information provided in the draft PPPS and the supporting Urban Design Analysis is not sufficient to allow an assessment of the appropriateness of the proposed heights at the key sites.** As such, the Trust makes the following objections based on the information provided:

1. The Star Casino towers - RL 180m (51 storeys) and RL 60m (16 storeys)

The revised RL of 180 as opposed to the height in the rejected SSD for the Star Casino Tower of RL 237 is an improvement, however, many of the issues raised by the City of Sydney, officers of DPIE who assessed the SSD, and the IPC remain:

- the height and scale is excessive and inappropriate to the surrounding environment
- the proposed tower would appear incongruous and incompatible with its surrounding built form context
- the Tower will affect the established character of Pyrmont and wider views and vistas from a large number of public vantage points.

The IPC noted in its refusal:

*"The Commission finds that the height, bulk, and scale of the Application do not represent good design in the context of the surrounding built environment and results in unacceptable visual impacts....the Application...will result in unacceptable built form, including a tower of height which is overly obtrusive and that will result in unreasonable and unacceptable impacts with respect to view loss, visual impact, and overshadowing."*<sup>7</sup>

The precedents and heights set at Darling Harbour and Barangaroo do not justify changing the development standards to permit a development that will have such a damaging impact on the historic landscape and setting of the Pyrmont Peninsula.

2. Blackwattle Bay (RL 120-156m)

The proposed heights between 19 and 45 storeys will not achieve the objective of "stepping down building heights from the topographic high points within the peninsula to the harbor edge".<sup>8</sup> Buildings of this height and in this narrow space will visually dominate Blackwattle Bay, crowd the Anzac Bridge (whose pylons are 120m tall), obstruct views and vistas to and from the Pyrmont Peninsula, and create a wall of

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<sup>7</sup> NSW Independent Planning Commission (2019) *Statement of Reasons for Decision: Star Casino Redevelopment – MP 08\_0098 (MOD 13)*, p.66 [https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2019/07/star-casino-site-mp-08-0098-mod-13/determination/191120\\_sor\\_star-casino\\_-final.pdf](https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2019/07/star-casino-site-mp-08-0098-mod-13/determination/191120_sor_star-casino_-final.pdf)

<sup>8</sup> Hassell (2020) *Pyrmont Peninsula Place Strategy: Strategic Framework Part B*, p.26.



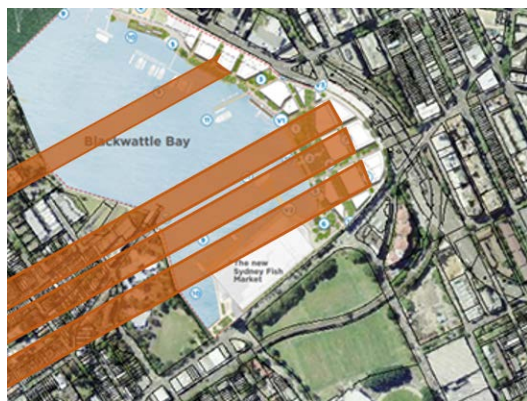


buildings that will alter the perception of the urban morphology and the remnant historic cultural landscape.

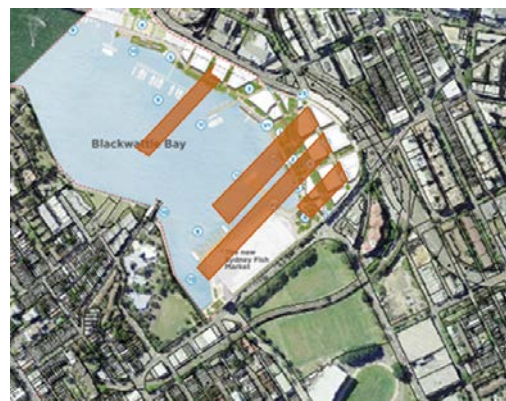
The estimate of the impact of shadows from four of the potential towers is shown in Fig 1. Moving north to south the height of towers are 19 storeys, 33 storeys, 45 storeys and 10 storeys based on indicative building heights in the Blackwattle Bay precinct scenarios for option “3. Jobs”.<sup>9</sup> The estimate of shadow lengths shows that at 7am the bay will be in shadow. By 9am the foreshore of Blackwattle Bay is still in shadow and the 45 storey building is casting a significant shadow over the new Fish Market site. From 22 September to 22 March the higher towers will cast shadow on the Blackwattle Bay foreshore area.

Shown below are estimates of shadow length for 22 June 2021 based upon indicative building heights in the Blackwattle Bay precinct scenarios.

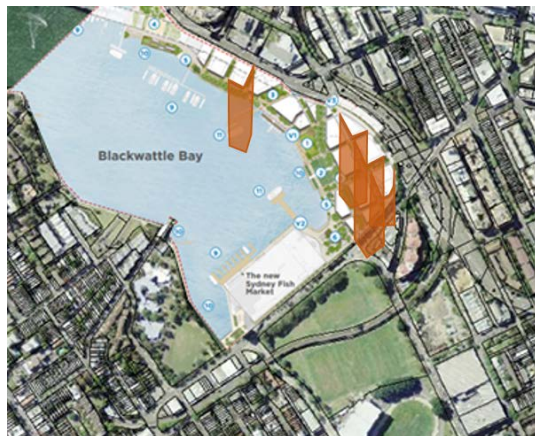
Mornings are a key time for water sports on Blackwattle Bay, harbourside walks, and visits to the fish markets. Having towers that throw these areas into shadow is bad urban design and will reflect poorly on the significant investment in the new fish market whose roof and harbourside platforms are designed specifically to engage with the sunlight of the bay.



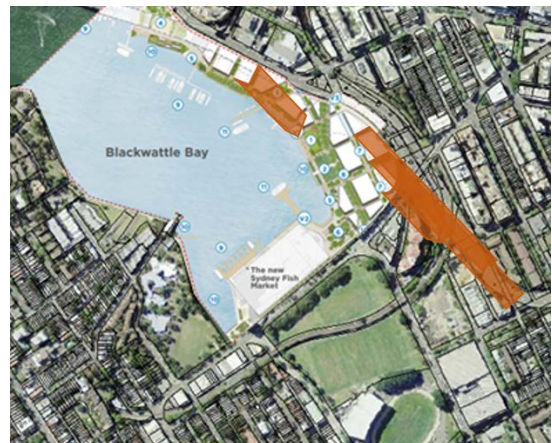
7.15 am



9am



12pm



3pm

<sup>9</sup> Infrastructure NSW (2020) *Blackwattle Bay Revitalisation: Precinct options*, p. 18 [http://www.infrastructure.nsw.gov.au/media/2527/bays001-blackwattle-bay-consultation-a4-brochure-may2020\\_fa2\\_lr.pdf](http://www.infrastructure.nsw.gov.au/media/2527/bays001-blackwattle-bay-consultation-a4-brochure-may2020_fa2_lr.pdf)



### 3. Harbourside Shopping Centre – RL 170

The Harbourside Shopping Centre redevelopment originally proposed a tower with RL 166.35. Following the public exhibition and consideration of the submissions to the SSD, the applicant revised the height of the tower to RL 153.75.

The Supplementary Architectural Design Report supporting the Harbourside SSD application states that the “reduction in the height will minimise overshadowing impacts to the public domain as well as better relate to the height of the ICC Hotel.”

It is therefore incompatible with this concurrent Major Projects assessment that the Draft PPPS would recommend a height of RL 170 - even higher than a development deemed as unsuitable and inappropriate. The desire to squeeze in more commercial and residential floor space as deemed in demand by the supporting Pyrmont Peninsula Economic Development Strategy is given greater weight than a comprehensive State Government development assessment process that considers not only the benefits of a proposal to the owners and the economy but also the impact on the environment and the community. A more robust and balanced assessment of the proposed heights on key sites is essential, to good planning and to fairness.

### Metro Station

Underpinning the assumptions for job and residential growth on the peninsula is the provision of a new Metro station. The ellipse on the Structure Plan provides an indicative location for the new station. Its location centres on Harris Street and Union Square. In this area are places of local heritage significance including heritage items and the Pyrmont Heritage Conservation Area. The Pyrmont Village sub-precinct is described in the Draft PPPS (p.29) as “a historic ridgeline village of fine grain shopfronts and terrace houses”. The location, form, scale and construction of the Metro station should not impact on the heritage values of Pyrmont Village. Locally significant heritage items have already been lost through the construction of Metro stations, such as 7 Elizabeth Street, Sydney or are at risk, like Kia Ora at 62-64 Macquarie Street, Parramatta. The protection and conservation of the unique and significant heritage of Harris Street and the surrounding area should be a primary consideration in locating the new Metro station.

### Aboriginal Consultation

The Trust is very concerned and disappointed in the apparent lack of consultation with the local Aboriginal community in the preparation of the *PPPS Indigenous Cultural Heritage Report* prepared by Kelleher Nightingale Consulting Pty Ltd which states (p.ii):

*“Due to Covid-19 restrictions on face-to-face consultation and the increased risk of coronavirus to vulnerable members of the Aboriginal community, no Aboriginal community consultation has been undertaken for the project to date. Only preliminary desktop assessment and field inspection investigations have been undertaken.”*

DPIE’s *Community Participation Plan* (2019) states (p.10):

*“The Department actively seeks community views and tailor engagement programs to capture harder - to-reach audience including the young, people living with disabilities, the elderly, those living in rural areas, Aboriginal and Torres Strait Islanders and culturally and linguistically diverse people”.<sup>10</sup>*

We are all adapting to doing business and engaging with the community in new and innovative ways during the challenges of Covid-19 and social distancing. To not engage is unacceptable.

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<sup>10</sup> Department of Planning, Industry and Environment (2019) *Community Participation Plan*, p.10 [https://shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com/master-test/fapub\\_pdf/Community+Participation+Plan/DPIE+CPP.pdf](https://shared-drupal-s3fs.s3-ap-southeast-2.amazonaws.com/master-test/fapub_pdf/Community+Participation+Plan/DPIE+CPP.pdf)



## **Conclusion**

In summary, the Trust would like to see a future Pyrmont Peninsula that includes:

- A restored and operational Glebe Island Bridge, providing an important active transport link between Pyrmont and Rozelle, and continued boat access to Blackwattle and Rozelle Bays
- Wentworth Park returned to public land and made available as public open space
- The height of proposed development standards significantly reduced at Blackwattle Bay in order to achieve the following objectives:
  - visual primacy of the Anzac Bridge
  - not diminish the landmark quality of the new Sydney Fish Markets
  - retain key views to and from the Pyrmont Peninsula

The next stage in the consultation for the Pyrmont Place Strategy is the exhibition of the draft masterplans for the precincts. The Trust looks forward to the issues raised in this submission being addressed.

Kind regards,

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Director Conservation