

14 September 2020

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

Dear Steve,

Draft Pymont Peninsula Place Strategy | University of Technology Sydney Submission

This submission is made by the University of Technology Sydney (UTS) in relation to the Draft Pymont Peninsula Place Strategy (Draft PPPS). As a major stakeholder within the Pymont Peninsula, UTS thanks the Department of Planning, Industry and Environment for the opportunity to comment on this key strategic plan.

UTS strongly supports the NSW Government's decision to review the planning framework for Pymont and commends the Department's significant work undertaken to date in formulating the Draft PPPS. A spotlight and focus on this precinct which is of strategic importance to Sydney remaining globally competitive is critical, with the education sector being a key building block.

The focus on setting the right strategy, direction and outcomes is considered crucial and provides the community, key stakeholders and industry with clarity and confidence that will assure Pymont's next evolution will be as successful as its last.

Context

As positively acknowledged within the Draft PPPS, UTS has commenced preliminary master planning for its Ultimo Haymarket Precinct, which with the effective completion of its Broadway Precinct, will provide for the future growth demands of the university within its City Campus over the next 10 – 20 years. Our Ultimo Haymarket Precinct includes two key masterplan sites comprising Building 13 to 15 sites located on the corner of Harris Street and Mary-Anne Street Ultimo which includes UTS Building 15, a vacant carpark site and an adjoining shop with residence above, and the Building 5 site within Haymarket located to the east of the Goods Line which includes existing UTS Buildings 5A to 5D.

Over the next couple of years, we propose to undertake detailed master planning for these two key sites which are currently divided by the UTS Business School and the Goods Line but form one collective UTS precinct, centered around innovation in technology and creative industries.



Figure 1 – Key Masterplan Sites within UTS Ultimo Haymarket Precinct

UTS is currently undertaking a process to explore opportunities for a development or invest partner to collaborate with in terms of the redevelopment of Site 5 and Sites 13-15. The Draft PPPS and the future sub-precinct master plans are critical documents in terms of understanding the opportunities for UTS to collaborate with a development partner and will play a key role in determining UTS' plans for redeveloping the sites.

The following sections outline UTS' key comments on the exhibited Draft PPPS and associated documents. Also included at **Attachment A** are additional and more detailed comments.

Holistic Planning Approach for UTS

The Study Area in which the Place Strategy was intended to be based includes the land occupied by Darling Drive up to the boundary of Site 5 but excluded Site 5. However, the Draft PPPS includes Site 5 in various sections and maps including the draft Structure Plan. It is clear that there is a heavy reliance on Site 5 in terms of realising the vision and strategic directions for the Pyrmont Peninsula. UTS supports a simpler consolidated planning regime for the masterplanning and redevelopment of both sites within its Ultimo Haymarket Precinct. There would be difficulty in potentially redeveloping Site 5 in conjunction with over Darling Drive development and connections to the Goods Line should they be subject to different planning controls and potentially consent authorities.

UTS' strong preference is for a singular and unified planning regime to apply to **all** of UTS' landholdings within the Ultimo Haymarket Precinct. In our submission to the City of Sydney Council on its Draft Central Sydney Planning Framework, we identified that the proposed plans that are intended to apply to Site 5 do not support educational land uses, which have very different functional and spatial requirements compared with more typical commercial uses of the more traditional CBD core (which is more of the key focus of Council's plans). Furthermore, residential accommodation (which includes student housing) is not permitted under the Tower Cluster planning pathway but is a key use being considered by UTS Site 5 including the proposed development of an Indigenous Residential College on Site 5A.

Accordingly, UTS may not have the opportunity to utilise the proposed Tower Cluster planning pathway given the specific development parameters for university uses within podium floors being unable to meet the base case requirements outlined in the Draft DCP for such a pathway, and further given the restriction on student housing to support university uses.

There is the real potential for disjointed planning outcomes arising from not having all of UTS' landholdings under the one planning regime, which could undermine the success of the Innovation Corridor.

Recommendation No. 1

All of UTS' landholdings be included within the Draft PPPS and the sub-precinct master plan being prepared for Ultimo also to include Site 5.

Site 5 is included within the planning regime for the Pyrmont Peninsula which is to prevail to the extent of any inconsistency over the Central Sydney Planning Framework.

Key Sites

The inclusion of UTS as one of the 4 key sites recognising the work already commenced by UTS for its next phase of campus growth and its crucial role as an anchor institution and facilitator of collaboration and innovation with industry, is strongly supported. UTS more than any of the other key sites has the greatest potential to positively contribute towards the Innovation Corridor.

UTS seeks clarity on whether the UTS key site only covers Ultimo (Site 13 – 15) or also Haymarket (Site 5) as both sites are shown in the draft Structure Plan and referenced the various supporting report. UTS is planning its Ultimo Haymarket Precinct as one consolidated precinct which is important for the creation of new connections and a coordinated sense of place for its whole precinct.

The key sites map on page 78 of the Draft PPPS incorrectly maps the UTS Ultimo Haymarket key site as being located within the UTS Broadway Precinct. Delivery of the Broadway Precinct Masterplan was completed last year, with the exception of the podium extension to Building 1 which has not yet commenced. The UTS Ultimo Haymarket Precinct includes Building 5, Building 8 and Sites 13 to 15, which are all located north of Ultimo Road between Quay Street to the east and Harris Street to the west. UTS has no short to medium term plans to further develop its Broadway Precinct other than contributing to the design and construction of public domain within Jones Street in conjunction with the City of Sydney. The redevelopment of the Ultimo Haymarket Precinct will need to precede the demolition of Building 4 within the Broadway Precinct due to the challenges and costs associated with decanting Building 4 science labs and the newly completed Science Research Facility which would need to be rebuilt in a new location prior to demolition. Accordingly, further progress of the Bon Marche and Science Concept Plan between Broadway and Thomas Street is now a long term plan for UTS with staged redevelopment of its Ultimo Haymarket sites as short to medium term.

It is noted that the concept of facilitating development of the key sites is founded on offsetting the development uplift with provision of additional public benefits. This approach needs to be carefully considered for land uses and types of development that are central to the success of the Innovation Corridor, e.g. IT, media, tech commercial development, university development, student housing, etc which should be supported/incentivised and not unduly burdened with contributions, affordable housing, public benefits etc.

Furthermore, both UTS sites are currently underdeveloped in accordance with current planning controls and the City of Sydney's Draft Central Sydney Planning Strategy identifies Site 5 as potentially capable of accommodating a 50% uplift on current LEP controls without the need for a Planning Proposal (PP). The City recently exhibited draft changes to its development contribution framework as part of the Central Sydney Planning Framework, however this does not yet take into account the case for exemptions from some contributions where a public benefit may be provided in accordance with Circular D6. UTS is open to considering the provision of uses that have additional public benefits such as publicly accessible open space and courts provided these are in lieu of payment of contributions, with costs associated with such infrastructure offset against any development contributions that may otherwise be payable.

UTS Site 13 to 15 on the corner of Mary Ann Street and Harris Street is a focus of current masterplanning and is recognised as a high priority site for UTS. UTS plans to integrate the heritage listed Building 15 into a new podium across the three sites with a tower above, by embracing sustainability and mid-century heritage within a contemporary educational building focused on creative industries, innovation and design excellence. A heritage consultant has been engaged to assist the architectural team to develop the masterplan for this site. The relationship of UTS's new building to the adjoining Frank Gehry designed UTS Business School is particularly important in preparing a new masterplan for this site.

The creation of new public open space along Omnibus Lane adjoining Site 13 to 15 and improving activation to surrounding streets is currently being considered in UTS masterplanning. The Draft Structure Plan shows open space through the centre of UTS Key Site 13 to 15. It is not possible to create a park through this site and create a podium for educational uses with a tower above it, particularly given the above podium setbacks required to minimise overshadowing impacts to the neighboring residential property. Additional public domain is proposed to be created along Omnibus Lane and a new east west mid-block connection from Harris Street to Omnibus Lane is also being explored as part of the future building.

UTS advises the Department that the location of open space and development footprints for Site 5 as shown on the draft Structure Plan differ from UTS's current masterplanning. The detailed concept planning for the first phase of Site 5 redevelopment at the southern end to accommodate the UTS Indigenous Residential College (IRC) and an adjoining building includes a pedestrian walkway separating the new development from existing UTS Building 5B. Future open space is proposed to be located adjacent to this walkway. UTS would be happy to share its current initial concept planning for Site 5 with DPIE particularly in relation to the IRC and open space location. UTS additionally notes the suggestion within the exhibited documents for four open courts to be provided on its site for shared community and university uses. Given site planning issues associated with balancing podium educational uses, rooftop university open space and sustainability initiatives and additionally providing public passive open space, UTS request discussion with DPIE on this suggested infrastructure provision. Given site planning constraints it may be possible for some of the courts to be indoor rather than outdoor courts and/or for the courts to be provided above the bus parking area.

Recommendation No. 2

The UTS Key Site is expanded and/or clarified to cover both Ultimo and Haymarket UTS sites.

That the Key Sites map is corrected to show the referenced Ultimo Haymarket key site as being located in the Ultimo Haymarket Precinct rather than the Broadway Precinct where it is currently depicted.

That the mid-site open space on UTS Sites 13 to 15 be removed and replaced with new local open space shown along Omnibus Lane.

That DPIE engage directly with UTS on the location and provision of open space on Site 5 as identified within the draft Structure Plan and the Infrastructure Report.

That further certainty is provided in relation to offsetting development contributions that may be payable where works that have a material public benefit are provided by UTS. This includes but is not limited to provision of publicly accessible open space, recreation facilities and infrastructure used for public purposes.

Multi-Utility Hubs

The idea and principle of taking a more integrated and holistic approach to sustainability is sound and supported.

It is noted that one of the four (4) multi-utility hubs proposed for Pyrmont covers UTS' landholdings (Site 5). UTS has some concerns over such a facility being located on its land but is open to consideration of accommodating some of the sustainability initiatives of the proposed multi-utility hubs subject to:

- the space requirements for the hub not impacting on the space needs of the university for teaching and learning purposes, particularly at ground and podium levels, and
- the space requirements for the hub not impacting on UTS being able to provide for and meet its own sustainability initiatives and goals including but not limited to solar panels and rooftop open space, and
- being able to accommodate uses within a one level basement given the water table and flood related constraints associated with Site 5, alongside other UTS basement space needs, and
- a better understanding of who will fund the utility hub and through what mechanism without additional financial impost on the university.

UTS does not support the creation of precinct parking on its sites as it is in direct conflict with university uses required for podium floors, would impact the ability to create new active ground floor and engagement spaces particularly in terms of improved relationships with street frontages and future green streets, and based on site conditions that preclude the construction of more than one basement being financially viable associated with groundwater and flood constraints.

Furthermore, development of sites for education purposes often utilise basement space for teaching purposes or to accommodate plant to free up rooftop space for sustainability initiatives such as rooftop gardens and solar panels and limit the provision of car parking. It is suggested that a better located alternative site that is still located close to light rail and yet more proximate to development sites within Ultimo and Pyrmont for residential and employment uses would be the Harwood Powerhouse Museum Site.

Recommendation No. 3

Delete reference and expectation for the multi-utility hub on UTS sites to include precinct parking.

Engage directly with UTS on the multi-utility hub proposal to enable a more detailed consideration of the potential feasibility to accommodate some of the initiatives on Site 5 and how it might impact on current UTS masterplanning for its sites.

Provide further clarity on the funding model for the utility hubs especially in the case for land uses and development that should be supported and incentivised (e.g. education).

Darling Drive

UTS support the identified opportunity within the draft Structure Plan to develop over and utilise land on Darling Drive. UTS recognise the importance of the open bus parking area along Darling Drive to support the nearby Darling Harbour tourism and entertainment uses, however acknowledges this use prevents an active street frontage from our site along most of the Darling Drive frontage and the opportunity to create an effective and engaged connection with The Goods Line. The bus parking area effectively renders Darling Drive a service road. The Draft Structure Plan's suggestion to develop over and utilise some land above Darling Drive for other uses is supported whether that be:

- for open space to improve connections to and/or extend the Goods Line, or
- to accommodate some of the functions of a potential multi utility hub, or
- provide land for the suggested recreation facilities, or
- to facilitate buildings above to allow opportunities for more effective site planning on the remainder of the site taking into account future uses and a proposed sun access plane to the Goods Line.

UTS is supportive of improving east-west pedestrian connectivity between the UTS sites and surrounding sites within the precinct, potentially via a new landscaped land bridge link from the Goods Line to the Building 5 site across Darling Drive. It is acknowledged this opportunity is reflected within the Draft PPPS as shown on the Draft Structure Plan and accordingly UTS would be willing to discuss opportunities to include such land within future master planning should the landowner be agreeable and a funding mechanism made available for delivery of such works.

Jones Street Closure

UTS strongly supports the need to balance growth with supporting additional amenity, such as open space. In this regard, UTS supports the PPPS priority for Ultimo that includes closure of Jones street between Broadway and Mary Ann Street for a linear park.

UTS has long see the strategic benefit not only for its students but the broader Pyrmont Peninsula of converting Jones Street into a new green open space spine.

UTS is actively pursuing the closure of Jones Street and creation of a new area of public open space with the City of Sydney Council. It is noted that the Infrastructure Delivery Study prepared by GLN identifies the City of Sydney Council as the body responsible for investigating the closure of Jones Street. UTS is prepared to fund the design and delivery of a new public domain within Jones Street between Broadway and Thomas Street. The PPPS raises the question of whether UTS would need to proceed with leasing Jones Street for the purpose of developing a new linear park or whether the closure of Jones Street is to be considered as a responsibility of the Council under the PPPS requiring UTS to fund the design and construction only.



Figure 2 – Jones Street Closure

Implementation

UTS acknowledge the focus of the NSW Government in establishing the strategic direction for Pyrmont and provides its support to continuing this momentum into implementation. During this most uncertain time the community, stakeholders and industry need clear direction and confidence around timing and approach for implementation.

Once again, UTS thanks the Department for the opportunity to comment on the Draft PPPS and looks forward to further discussion and collaboration as the PPPS is finalised and the next phase of sub-precinct planning commences.

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'K. Krason', with a long, horizontal, wavy line extending to the right.

Kara Krason
Head of Campus Planning and Design
Program Management Office UTS

Attachment A – UTS Detailed comments

Document	Section/Page No.	Comment
Draft PPPS	<ul style="list-style-type: none"> Page 9 Figure: List of key attractions, businesses and heritage 	<ul style="list-style-type: none"> Recommend UTS Ultimo-Haymarket is added to map. Suggest Item 13 is relabelled correctly as UTS Broadway.
	<ul style="list-style-type: none"> Page 16 Section: A new wave of investment 	<ul style="list-style-type: none"> Recommend reference to next phase of master planning for UTS is expanded to include the following "...in its Ultimo-Haymarket Precinct" as they are linked and considered as one by the University.
	<ul style="list-style-type: none"> Page 36 Section: A diversity of housing types, tenure and price points. 	<ul style="list-style-type: none"> Recommend that student housing is also recognised, as it is elsewhere in the PPPS.
	<ul style="list-style-type: none"> Page 45 Figure: structure plan 	<ul style="list-style-type: none"> UTS support the potential opportunity to incorporating the existing bus parking along Darling Drive as part of the redevelopment of Site 5. The area of open space identified for part of Site 13-15 is not supported and it is recommended that it is removed from the map. UTS' plans for this site is reliant on its full redevelopment potential. Clarification required as to whether open space opportunities identified include both at the ground as well as above ground. This is particularly in relation to the central east-west area of open space identified for Site 5.
	<ul style="list-style-type: none"> Page 46 + throughout Sub-precincts 	<ul style="list-style-type: none"> Recommend that reference to the Ultimo Sub-precinct is expanded to include Haymarket, i.e. the Ultimo-Haymarket sub-precinct.
	<ul style="list-style-type: none"> Page 54 Tumbalong Park, third paragraph 	<ul style="list-style-type: none"> Reference is made to Site 5 in terms of future tower cluster. It is recommended that this is deleted. Discussion in terms of Site 5 should be limited to the Ultimo-Haymarket Sub-precinct.
	<ul style="list-style-type: none"> Page 59 Ultimo place priorities: 19 	<ul style="list-style-type: none"> Recommend deletion of integrated parking from multi-hub aspiration. Above ground parking is strongly opposed by UTS, given its conflict with university uses required for podium floors.
	<ul style="list-style-type: none"> Page 77 Framework for key sites 	<ul style="list-style-type: none"> Reference to UTS expanding into Ultimo should be expanded to also reference Haymarket.

Document	Section/Page No.	Comment
	<ul style="list-style-type: none">• Page 78• Figure: Key Sites	<ul style="list-style-type: none">• Recommend that the symbol for UTS is moved further north and closer to Site 13 – 15 and Site 5.• Further clarity and certainty on development heights is recommended for UTS “Special Considerations”.