

**From:** [no-reply@planning.nsw.gov.au](mailto:ppps-response---angela-wu-12-september-2020.pdf) on behalf of [Planning Portal - Department of Planning and Environment](#)  
**To:** [DPE PS ePlanning Exhibitions Mailbox](#)  
**Cc:** [REDACTED]  
**Subject:** Pyrmont Peninsula Place Strategy  
**Date:** Sunday, 13 September 2020 3:30:59 AM  
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Submitted on Sun, 13/09/2020 - 03:29

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am making a personal submission

**Name**

**First name**

Angela

**Last name**

Wu

**Council name**

{Empty}

**Council email**

{Empty}

**I would like my submission to remain confidential**

No

**Info**

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Pyrmont

**Submission file**

[ppps-response---angela-wu-12-september-2020.pdf](#)

**Submission**

Thank you for the opportunity to submit my response to the Draft PPPS. My submission is attached.

**I agree to the above statement**

Yes

{Empty}

## Draft Pyrmont Peninsula Place Strategy

Angela Wu Submission 12 September 2020

Dear NSW Department of Planning, Industry and Environment ("DPIE"),

My name is Angela Wu and I am an existing home owner within Pyrmont. I would like to thank you for the opportunity to submit my response to the recently posted Draft Pyrmont Peninsula Place Strategy July 2020 ("PPPS").

Within my submission I will be drawing reference to the following documents and webinars:

- Pyrmont Peninsula Place Strategy Phase 1 Engagement Report June 2020 ("Engagement Report")
- Blackwattle Bay Precinct Plan ("BBP Plan")
- Blackwattle Bay Precinct Response submission dated 30-05-20 and submitted to the Infrastructure of NSW ("BBP Submission") (attached in Appendix B)
- Blackwattle Bay Webinar attendance dated May 26 2020 ("Webinar 1")
- PPPS Webinar attendance dated August 19 2020 ("Webinar 2")

Due to the scale of the PPPS proposal and time pressures, my submission will be focused on addressing the proposed tower structures with specific attention towards Direction 2 - Development that complements or enhances that area ("Direction 2"). This is due to the fact that this has been heralded as the most controversial component of the PPPS by the wider community and is likely to impact the community the most compared to other directions.

My submission is structured to address five findings from my review of the PPPS. Each finding is supplemented with my recommendations and ideas on how these findings can be addressed in future version(s) of the PPPS. I hope that my submission can be constructive and useful to the forming of the final strategy for Pyrmont.

Please feel free to reach out to me directly should you have any questions regarding my submission.

I thank DPIE once again for the opportunity to present my opinion on the PPPS.

Kind Regards,  
Angela Wu

*Note: For avoidance of doubt in how to read this document:*

- *Relevant quotations and extracts supporting my findings are italicised and highlighted in grey boxes.*
- *Recommendations are highlighted in blue boxes.*

## Finding 1: Misalignment of strategy with community engagement findings

*"Comments celebrated the area's medium-density development and human scale; the heritage terraces were seen as local icons. Participants did not want to see more dense development in the area."*

A key concern of the PPPS is the misalignment of findings from the Engagement Report with proposals. As with any community consultation, the purpose of the Engagement Report is to be a tool to guide the outcomes and priorities of the PPPS and implementation of its 10 Directions. However, through thorough analysis I am of the opinion that the solutions proposed in the PPPS are in contradiction with the results presented in the Engagement Report. This opinion is reiterated by the community in following extract from the Engagement Report: *"There were concerns that the results of the consultation process are not always respected in the area, to the detriment of the community's quality of life."*

The Engagement Report has consistently highlighted the importance of Direction 2. *"Density and development that complements the area"* has been identified as the *most* frequently raised issue by the community. As such, it can be presumed that Direction 2 should take utmost priority as a guidance factor when designing built form. The community has been abundantly clear with its rejection of high-rise buildings, tower structures, large developments or similar proposals which has remained a controversial subject for years. Nonetheless, the PPPS has demonstrated a blatant refusal to acknowledge the most important issue via its proposal of various tower structures with heights ranging from RL60 - RL180 throughout the generally medium height morphology of the peninsula.

In the context of the below quote extracts, tower structures are by nature a direct contradiction to: human scale, medium-density, village feel and heritage terraces.

*"Respondents praised the area's village feel, particularly its low density, its mixed-use precincts and its housing diversity."*

*"Respondents' key concerns centred on large developments, particularly those involving high-rise buildings and high density living"*

*"Definitely no more high rise development."*

### Recommendation 1 - Align with community engagement findings

It is recommended that the PPPS align its proposals to findings from the Engagement Report - even if it proves to be a challenge for how the strategy for Pyrmont can be implemented. In this instance, there is a clear direction for:

- No high rise developments, let alone skyscraper style built form; and
- No high density living.

Alignment of community engagement and design is required to achieve a coherent solution for master plans of this scale. Ignored community engagement will inevitably lead to a fractured Pyrmont community of the future and likely higher development costs from project delays.

## Finding 2: Sensible and innovative approach to growth and density

*"Embracing a sensible approach to growth will see more change, including taller buildings in Blackwattle Bay, Ultimo and the southern part of Darling Island and parts of Tumbalong Park..."*

### A sensible approach

The PPPS has often tried to justify the proposed incongruous tower forms as a solution to achieving "good growth" for the future of Sydney. For various reasons, a proposal for tower buildings in Pyrmont can not be considered a "sensible" approach,

considering its inherent insensitivity to the existing context of Pyrmont. Whilst it is recognised that Pyrmont has a real opportunity for growth, the community is convinced that unfortunately it has been used as an ingenuine excuse for passing through private developers' profit strategies. A sensible approach to growth should be achieved via a density policy with strategic linkages to demographic and economic growth, employment creation and productivity.

Urban planning experts around the world have suggested mid-rise for the best quality of correspondence between the human scale and the development of density of the city.

### A call for innovation design solutions

There is no doubt that tower structures are a quick and easy solution to achieving density. However this is not considered good design and certainly does not represent Pyrmont to be a place of innovation and technology as the PPPS has outlined in its vision. The PPPS should embody the innovation described and therefore encourage innovative design solutions in the strategies and building forms proposed. Higher densities do not always have to necessitate tall buildings, particularly where a well-considered, design-led approach is taken. Considering Pyrmont has been cited as "Australia's most densely populated suburb", a careful and innovative approach to increasing density is fundamental to the successful future of Pyrmont.

#### **Recommendation 2 - Innovative solutions to density**

It is recommended that the design team explore alternative and more innovative approaches to achieving density without introducing incompatible tower buildings. Pyrmont should be striving to become a model for excellent urban planning rather than another example of failed urban sprawl.

It is also recommended that the design team reflect some of the 'Urban Innovations' published by Sidewalk Labs (subsidiary of Google) for some inspiration on what the PPPS could implement for

Pyrmont. This level of innovation and design calibre is synonymous with the PPPS's vision for Pyrmont representing a place for innovation.

Urban innovations include strategies for:

- Mobility
- Public Real
- Buildings and Housing
- Sustainability; and
- Digital Innovation

A copy of this document can be found here:

[https://storage.googleapis.com/sidewalk-toronto-ca/wp-content/uploads/2019/06/23135715/MIDP\\_Volume2.pdf](https://storage.googleapis.com/sidewalk-toronto-ca/wp-content/uploads/2019/06/23135715/MIDP_Volume2.pdf)

### Planning our urban future for the impact of COVID-19

Understandably the draft PPPS has not been allowed sufficient time to respond to the abrupt changes the Covid-19 pandemic has imposed on the globe. However, in light of sensible growth, it is expected that future versions of the PPPS should consider shifts in the built environment and urban planning. As history has demonstrated, pandemics have always triggered evolution in architecture and city planning. By way of example, the spanish flu, tuberculosis, typhoid and polio prompted urban planning, waste management, single-use zoning and emphasised sterility in the 20th century.

It is apparent that Covid-19 will - and is already having - a similarly profound impact on the built environment of today. In a similar fashion, the notion of "normal" urban life is being disrupted by the current pandemic. Telecommuting has been embraced to adapt to this sudden change. The reality is that there is likely going to be a steep decline in demand for large office real estate. With many global organisations maintaining work-from-home policies for the foreseeable future in response, the PPPS must remain flexible in reflecting this 'new normal'. It is anticipated that the future of the office space will more likely pivot away from large open plan to 'micro-offices' spread across cities and countries. ('Goodbye, Open Office. Hello,

'Dynamic Workplace', Christopher Mims, WSJ, 12 September 2020)

Google being a main tenant in Pyrmont has led the way in allowing employees to work-from-home and already we have witnessed a mass exodus from both San Francisco and New York. Other large hi-tech companies such as Facebook, Uber and Twitter have largely followed suit and have even extended the concept of work-from-home to 'forever'. *"Slater Gordon Solicitors have announced that they will be vacating their London office in September 2020 and that remote working will become the norm for all of their two thousand staff. According to LSH 88% of office workers believe that they could work at least two days a week at home without impacting on their work and mental wellbeing."* (CEBM, The University of Oxford, July 6 2020)

In essence, the requirement of large centralised offices in or near the CBD is quickly becoming outdated and challenged. The PPPS must not be inflexible in its commitment to develop office buildings to suit an expired and conventional model of corporate working. The pandemic has served as an optimum opportunity for large cities around the world, such as the City of Sydney, to improve urban planning and resolve issues inherent to over-populated and dense cities e.g. commuters fatigue, poor work-life-balance, worsening traffic, affordable housing, urban sprawl and aging infrastructure.

### **Recommendation 3 - Learning from a pandemic and embracing opportunity to evolve**

It is also recommended that the future PPPS carefully consider the impacts of Covid-19 on the built environment and urban planning rather than push forward with strategies appropriate for the 'pre-covid' world. With the potential for people spending more time at home for telecommuting and relying on outdoor and green spaces more, my initial recommendations are as follows:

- Further maximise green space and foreshore access, perhaps even

considering these as potential co-working or collaboration spaces;

- Prioritise designing multi-purpose open spaces to enable social distancing but also enable community interaction. Although this seems paradoxical, this pandemic has taught us the importance of open public space e.g. plazas, promenades and parks in lieu of roads, office buildings and parking structures.
- Ensure solar access to existing residents in the Pyrmont area is maintained and protected as people are more likely to work from their homes;
- Prioritise quality telecommunications infrastructure;
- Reconsider the need for large office real estate and consider 'micro offices' designed for co-working spaces combined with open air amenity spaces.

The pandemic has provided us with an opportunity to address long overdue urban planning issues. I hope the PPPS will embrace this to ensure a sustainable and future proof masterplan is delivered - this aligns with the direction of "Building now for a sustainable future".

## **Finding 3: Compromising existing residents**

As per the Engagement Report, the general consensus of the community is that the proposed tower developments will be introduced *"to the detriment of the community's quality of life."*

The following factors are only some examples of how the proposed high-rise towers will compromise the quality of living of existing Pyrmont residents:

- Overshadowing and access to natural light
- Visual quality and disruption of views
- Impact on the biosphere and health
- Worsened traffic conditions
- Strain on existing infrastructure

However, aside from brief mentions of a supposed sun study being conducted, none of these factors have been addressed to date despite probing by the community during webinars.

There is a question as to how stakeholder interests are being prioritised when it comes to the topic of these tower developments. There is a particular concern that the interests of private developers and politics are taking priority over those of local residents. This concern is justified by the PPPS's misalignment with community engagement findings as described in Point 1 above. This understanding is further reinforced by Geoff Gerring's response to this question from the **BBP webinar** who justified the height of the towers by suggesting it was a *"once in [a hundred year's] opportunity to develop on the waterfront"*.

Local residents are the stakeholder group which will be the most severely affected by any proposals which come to fruition. Therefore, any proposal should be assessed for social and health impacts to existing local residents as a priority.

#### Recommendation 4 - Reprioritise the existing community of Pyrmont

Recommendations to mitigate impact on existing residents include consideration of the following as a minimum:

1. Overshadowing of proposed building form should not only consider existing green spaces but also the homes of neighbouring residents. Built form should not violate the rights of solar access by existing residents. Access to natural light is detrimental to the health of people and studies have shown that lack of natural light has a direct correlation to sick building syndrome. A comprehensive sun study must be conducted for impact to all surrounding residences and the PPPS should strive to maximise solar access rather than achieve the bare minimum standards.

2. Rights of existing residents to visual quality shall not be diminished by replacing views of the water with those of the back of tower buildings. Built forms must add value or complement existing visual quality.
3. Comprehensive studies on existing infrastructure should be conducted in collaboration with relevant bodies (such as Transport for NSW) to determine the impact of increased density on Pyrmont and the key transport nodes / roads. Mitigation factors, including improved infrastructure, should be integral to future iterations of the PPPS. Infrastructure to be reviewed includes but is not limited to:
  - a. Healthcare
  - b. Schools
  - c. Roads and Transport
  - d. Public Space
4. Prioritising stakeholders:

Order of draft PPPS priority stakeholders	Recommended order of PPPS priority stakeholders
<ol style="list-style-type: none"> <li>1. Government</li> <li>2. Private Developers</li> <li>3. New Residents</li> <li>4. General Public</li> <li>5. Local Residents</li> </ol>	<ol style="list-style-type: none"> <li>1. Local Residents</li> <li>2. General Public</li> <li>3. Government</li> <li>4. New Residents</li> <li>5. Private Developers</li> </ol>

## Finding 4: Out of context developments

*"Pyrmont contains some of Sydney's most precious heritage..."*

### Preserving Pyrmont

As already highlighted in the Blackwattle Submission, and echoing the opinion of fellow existing residents, the proposed tower and skyscraper forms are grossly out of context with the "urban village" nature of Pyrmont of the past and today. The Engagement Report reveals that "respondents praised the area's village feel" and the



sense of intimate community that Pyrmont embodies. This unique nature of Pyrmont must be preserved and not be threatened by the imposition of skyscrapers which are clearly only appropriate for the CBD.

Pyrmont morphology is primarily low-rise to medium scale ranging between 5 to 16 stories. Intertwined with the fabric of these medium scale apartment buildings are single storey heritage terrace houses to provide the density required. Therefore, there should be no surprise that there is an outcry from existing residents of Pyrmont in opposition of towers and skyscrapers ranging from 45 to 70 storeys. This equates to an abhorrent 300-500% increase in height from surrounding building form. The PPPS's suggested RL heights set out in "Framework for Key Sites" (page 79) are completely unjustified and unacceptable.

The PPPS often references the intention to protect select heritage conservation areas which primarily consist of low-rise, small scale homes. However, the PPPS is seemingly failing to address the undisputed visual impact of starkly juxtaposed tower structures which will overbear these heritage elements. It is essential that new buildings and developments strive to harmonise with historic ones.

### Unclear methodology for derivation of heights

Clarity was sought from both Infrastructure NSW and DPIE on the methodology for how these height planes were derived. In both instances, vague responses were provided and referenced heights guided by the CBD skyline and aviation limits. In the case of Blackwattle Bay, the height of the Anzac Bridge pylons was also referenced, however the 45 storeys proposed for the towers also surpasses these iconic structures (which have a height equivalent of 40 storeys). The collective responses only highlighted the lack of consideration for the immediate site and precinct of Pyrmont. To this date the community is yet to hear a convincing argument for how the heights proposed are appropriate to their sites.

In Webinar 1, David Haseler had commenced the presentation by suggesting the Plan will serve as "an extension to Pyrmont". This statement seems to be contradictory to the resulting proposed design which does not mirror or even gesture to the immediately adjacent architectural fabric dictated by existing buildings. It seems the "extension" to Pyrmont is merely geographical with the design demonstrating very little intention to be part of Pyrmont - rather, an extension of the CBD.

### A call for Contextual Design

All built forms proposed should be designed incorporating the values of the wider context of Pyrmont in both a physical (e.g. its site and adjacent built form) and socio-cultural sense (e.g. the history of Pyrmont and its previous uses). New building forms proposed must blend with the existing massing of Pyrmont and should certainly not be setting unprecedented heights and metaphorically 'stick out like a sore thumb'.

Should a tower in Moscow look like one in Dubai? Similarly, should a tower in Pyrmont look like one in Sydney CBD? Design showing such lacking consideration for its immediate surroundings is in essence failed design.

*"A community will benefit from a designer who understands the primacy of urban design in shaping urban housing projects. The scale, mass, and character of the surrounding context must be accounted for—and, ideally, enhanced—with the addition of new buildings" (Patrick Winters, AIA, Designing Density in Today's Urban Environments 09.09.16)*

### Recommendation 5 - Podium buildings as solution

It is recommended that proposed built form be reviewed to prioritise harmonising with the existing architecture and morphology of Pyrmont. The maximum height of buildings should be generated from references in the immediate site and not the CBD as this would be inappropriate.

The recommendation is that all new built forms should take on a podium style (low to mid rise of maximum 16 stories) which would provide the following benefits:

1. More efficient ratio of cost of construction vs density achievable;
2. Maximised cost economic efficiency - podiums are cheaper to construct at a \$/Rentable Space metric compared to towers which have a higher loss factor;
3. More relatable at a human-scale to mitigate socio-ecological issues which arise from towers;
4. Provides the opportunity to explore the use of more sustainable and innovative construction materials e.g. mass timber construction. (see examples in Appendix C). Mass timber construction has become iconic in representing low carbon developments (aligning with Big Move 4).
5. Less impactful on surrounding existing residential buildings in terms of solar access and quality of views;
6. More harmonised with Pyrmont's existing morphology; and
7. Likely to be less tension between the larger community's interests and the developer's project..

## Finding 5: Misalignment of design principles and proposed built form

The following guiding principles have been reiterated throughout both the PPPS and the BBP Plan:

- Enhance foreshore access;
- Protect heritage; and
- Complementing and enhancing the area.

These are all principles which are fundamental to the successful growth of Pyrmont without compromising its identity. However, it is disappointing that there is a blaring disconnect between these words on paper and the design team's translation into built form. In many instances,

responses by the project team in webinars have been contradictory and reiterated this disconnection.

### Enhance foreshore access

The design team has claimed that "built form is stepped down to the water" to enhance the foreshore. Whilst this would be the most sensible concept to implement, the tower structures proposed for both Blackwattle (RL120-156) and Darling Harbor (RL170) are both skyscraper developments on the water's edge and contradict this statement. In fact, the tower structures dramatically step up from existing buildings adjacent to these sites by approximately 60-100m. To justify the form of these towers via a "step down" where peak height is dictated by the towers itself is invalid. In order to protect the amenity of the water for the public it is essential to make the foreshore not only physically accessible but relatable at a human scale. The only way to achieve this is via open public space and building form that's relatable by pedestrians at street level.

### Complementing and enhancing the area

This is a principle that the community has heralded as being one of the most important factors. The Engagement Report communicates the following statistics for Direction 2 (Development that complements or enhances that area):

- Very Important - 63% of participants
- Important or Very Important - 83% of participants

Despite acknowledging this, the PPPS makes conflicting statements such as: *"a range of taller buildings complementing the character and heritage of the area..."*. Simply put, skyscraper buildings will physically never complement Pyrmont which is a history rich area that is primarily low to medium rise.

I refer to the precedent set by the Independent Planning Commission on the recently determined Star Casino Redevelopment MP 08\_0098 (MOD 13) Project. The proposed towers in the PPPS should be considered within the same len - they do not exercise good design and amenity of the built environment. In a similar argument, the towers



proposed will result in unacceptable built form, including tower(s) of a height which are overly obtrusive and will result in unreasonable and unacceptable impacts with respect to view loss, visual impact, and overshadowing.

#### **Recommendation 6 - Design to the principles**

It is recommended that proposed built form be reviewed to reflect this concept of stepping down built form to the water. Heights of buildings should follow a natural fall in the height plane dictated by existing morphology as illustrated in Appendix A diagram A. The benefits of this includes:

1. Maximising the enjoyment of the water by more residents, as opposed to limiting visual benefits to only be enjoyed by future residents of the towers.
2. Mitigation of overshadowing surrounding buildings and maximizing solar access to more residences.
3. Low-medium rise buildings are more relatable at human scale. This is particularly important from a socioecological standpoint.
4. "More, better and activated public spaces" on the foreshore through maximum solar access to pedestrian paths and proposed public spaces. Overshadowing by skyscraper buildings will create pockets of unused, dead spaces.
5. Better harmonisation of proposed built forms with the existing architectural fabric of Pyrmont and its heritage buildings.

With respect to my submission, a summary of key points to address are as follows:

1. Remove tower structures and replace with built form sensitive to Pyrmont's existing morphology and architecture.
2. Implement innovative design solutions to achieve growth in a sustainable and health conscious manner that does not involve tower structures. Consideration to be made for urban innovation ideas presented by Sidewalk Labs (as referenced).
3. Review the maximum RL levels and heights proposed by the PPPS and revise to an appropriate height - methodology for derivation to be communicated to stakeholders. For avoidance of doubt, an appropriate height for built form should consider the following as a minimum: existing planning instruments and its original intent, impact of proposed built form on existing residences and spaces, heritage sensitivity, and environmental impacts.
4. The final PPPS should be designed with a reprioritization of key stakeholders in mind.
5. Introduce and prioritize strategy on how key areas for improvement (as defined by the Engagement Report) will be resolved as part of the final PPPS.

## **Conclusion**

This concludes my submission for the Draft Pyrmont Peninsula Place Strategy dated July 2020. Thank you for your time in reviewing this document and I look forward to future versions of the PPPS which I hope and expect will address the concerns and findings by the Pyrmont community.

## Appendix A

Supporting diagrams as referenced within this submission

### Diagram A - Height Plane Diagram

This diagram was submitted as part of my BBP submission to demonstrate the disruption to the natural fall of the built form height planes that the Blackwattle Bay towers will bring. A similar concept can be applied to the Darling Harbourside tower proposals. The yellow plane roughly represents the idea of 'stepping down' to the water of Blackwattle Bay.

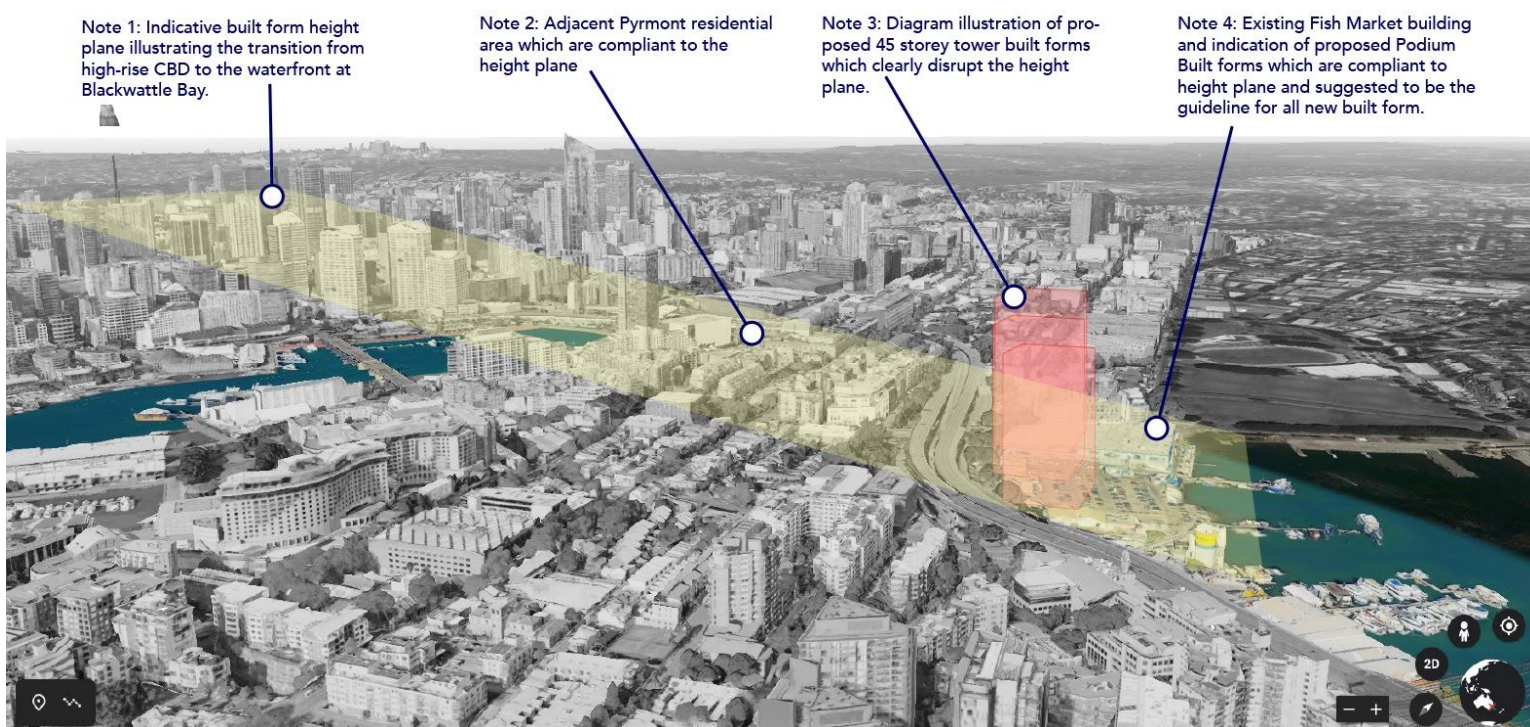
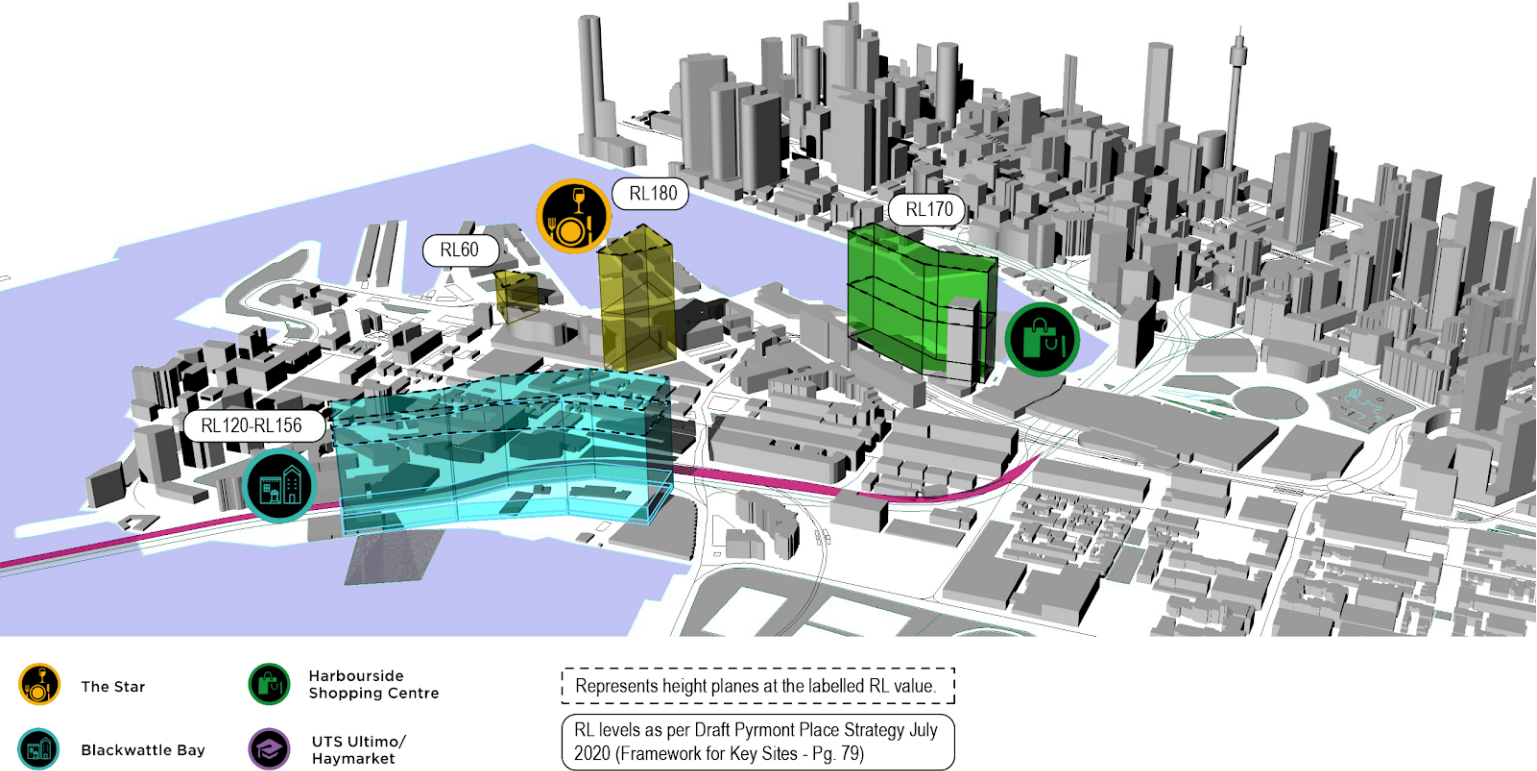


Diagram B - Developments that do not complement or enhance the area of Pyrmont.

This diagram reflects a model of the proposed built form tower heights currently indicated by the PPPS and its impact on Pyrmont. The incongruous nature of these tower proposals are made more obvious in this diagram and clearly do not represent the principle of ‘development that complements or enhances that area’. The diagram clearly demonstrates that the heights proposed for these towee forms are more synonymous with the CBD in the background than the low-mid rise morphology of Pyrmont.



## Appendix B

Blackwattle Bay Precinct Response submission dated 30-05-20 and submitted to the Infrastructure of NSW ("BBP Submission")

## **RE: COMMUNITY ENGAGEMENT - BLACKWATTLE BAY PRECINCT PLANNING**

Dear Infrastructure NSW,

My name is Angela Wu and I am an existing home owner within Pyrmont. I have felt compelled to submit my opinion on the Blackwattle Bay Precinct Plan ("the Plan") via email as I believe the online community and stakeholder survey does not enable for many community members to express their opinions accurately. For clarity, the survey is biased as response options are narrow and forces the respondent to express preference for at least one of the three proposals presented. As far as I understand, there is no option to select none of the proposals.

All proposals include 45 storey high-rise tower built forms which are unsuitable to the precinct for various reasons. Through consultation with various stakeholders of the Pyrmont area, I can confirm my opinion of this is shared by many. I have drafted this response letter after thorough review of the brochure titled 'Revitalising Blackwattle Bay' outlining the Plan, as well as attendance of the community webinar dated 26 May 2020 ("the Webinar").

### **Suitability of Tower Built Forms**

The reasons to support my statement that high-rise built forms are not suitable for the precinct are set-out as follows:

#### **1. How was the maximum height of the tower built forms derived?**

Neither the Plan or the Webinar has been able to clearly justify how the maximum height of 45 storeys has been derived.

- a. As presented on page 8 of the brochure and the Webinar, it has been recognised that Pyrmont Morphology is primarily low rise to medium scale ranging between 5 to 16 stories. When directed the question of how the maximum height of the towers was figured, David Haseler referred to the CBD skyline and Darling Harbour as reference points rather than the immediately impacted and adjacent area of Pyrmont. As clearly demonstrated on page 8 of the brochure, the maximum height of the towers even exceeds the majority of referenced projects which primarily fall within the 30-35 storey range.
  - i. How and why the CBD and Darling Harbour are appropriate reference points for dictating the built form in Blackwattle Bay?
  - ii. Why should the design of the Plan not address its immediate surroundings as a priority?
- b. David Haseler had commenced the presentation by suggesting the Plan will serve as "an extension to Pyrmont". This statement seems to be contradictory to the resulting proposed design which does not mirror or even gesture to the immediately adjacent architectural fabric dictated by existing buildings. It seems the "extension" to Pyrmont is merely geographical with the design demonstrating very little intention to be part of Pyrmont - rather, an extension of the CBD.

- c. 45 storey towers are not relatable at a human scale from the waterfront nor from the direction of Pyrmont and certainly do not fit the context of a heritage sensitive suburb such as Pyrmont. This point is perhaps reinforced in the artist's impressions of each scenario contained within the brochure. It is unlikely a coincidence that tower renders are faded to draw attention to the podium built forms which are far more appropriate to the context.
- d. It has been identified that the Anzac Bridge Pylons is 40 storeys and holds significance in Australian architectural history as the first cable stayed bridge. All existing built form falls below this to not take away from its significance. Why does the design team feel it's appropriate to have towers in all 3 proposals exceed this height?
- e. It was presented at the Webinar for all 3 proposals that "North Western End towers relate to existing developments". This begs for me to question why the other towers are not subject to the same guidelines?
- f. The sun study presented at the Webinar referenced consideration for Glebe Park and existing residential areas to the south. Please can you clarify why residential areas towards Pyrmont were not considered as part of this study? I believe a proper sun study should consider all surrounding residential buildings, not only a selection. Lack of consideration to all surrounding residential buildings will erode the enjoyment of Blackwattle Bay by existing residents via obstruction of natural light, and replacement of vistas to the water with views to the back end of 3 or more context insensitive towers.
- g. Please refer to **Attachment A** for a diagram supporting how the tower built forms are unsuitable.

## 2. Why are the tower built forms necessary?

Neither the Plan nor the Webinar has been able to clearly justify why the tower developments are necessary to enable the success of the Plan.

- a. I refer to Geoff Gerring's response to this question from the webinar who suggested that this was a "once in [a hundred years] opportunity to develop on the waterfront". My personal interpretation of this response is that the development of Blackwattle Bay has been considered as an opportunity for developers to commercially benefit - with or without consideration of the existing residents surrounding the precinct. I do not feel that this is an appropriate response.
- b. The Plan refers to support of "affordable housing" being considered for 5 to 10% of dedicated new floor space. Can you please justify why the remaining 900-1000+ apartment developments will be necessary to Pyrmont which has often been referenced as "the most densely populated suburb in Sydney"?
- c. The Podium Scale built forms appear to be far more appropriate to the context whilst helping achieve the key principles set out by the Plan. The podium built forms defined as 4 to 6 storeys (21m) and recognised as "desire human-scale



height” provides for a more sensitive transition from the CBD to mid-rise Pyrmont down to the newly activated water’s edge.

### **3. Does the Plan take into account precedent rulings by the Independent Planning Commission?**

I refer to the precedent set by the Independent Planning Commission on the recently determined Star Casino Redevelopment MP 08\_0098 (MOD 13) Project. The proposed design for the Plan across all 3 scenarios can be considered in a similar fashion and do not exercise good design and amenity of the built environment. In a similar argument, I strongly believe that the towers proposed will result in unacceptable built form, including tower(s) of a height which are overly obtrusive and will result in unreasonable and unacceptable impacts with respect to view loss, visual impact, and overshadowing.

### **Impacts to Traffic**

The Plan is currently lacking consideration of impacts on existing and future traffic conditions in the general area. As confirmed in the Webinar, traffic modelling has not been conducted to date.

Pyrmont is located at a primary connection node with highways to: the CBD, North Sydney, Western suburbs, South Sydney and Easter suburbs. Whilst this makes it seemingly convenient for residents, Sydney’s population growth has inevitably led to notoriously bad traffic at peak hours (pre-Covid 19). The existing infrastructure is already proving insufficient. To provide a personal example, a short drive down Harris Street to turn onto Bridge Road (roughly 500m) anytime after 4pm on a weekday, has often taken up to 40 minutes as commuters battle to get onto the Anzac Bridge. The Harris Street & Bridge Road junction is only one example out of many that Pyrmont locals currently suffer.

The Plan should not proceed without the following as a minimum:

- a comprehensive traffic study,
- proposals to mitigate any risk of worsening existing conditions by introducing additional influx of people to the area, and
- proposals to improve existing infrastructure to relieve traffic conditions.

### **Recommendation Summary**

The elements of the Plan detailed above should be reviewed for good design principles and improved sensitivity to the context of the site. The main outcomes I am seeking for a revised Plan are summarised as follows:

1. No out of context high-rise tower structures.
2. Conduct a proper sun study to ensure built form design considers all surrounding residential buildings.
3. Keep new built forms to the maximum height of the proposed podiums heights (4 to 6 storeys or 21m).
4. Conduct a comprehensive traffic model to inform design of the Plan.

5. Propose mitigation strategies from the results of the traffic model to be implemented into the new Plan design.
6. Propose strategies to improve existing infrastructure surrounding the precinct to aid with traffic management.

Finally, I would like to thank Infrastructure NSW for the opportunity to provide feedback via community engagement. Pyrmont is home to many residents passionate about protecting the neighbourhood that is loved. I am keen to see our comments and concerns addressed in iterations of the Plan and design. Many of us are excited to see the new precinct come to fruition and support a lot of the principals that the Plan embodies. However, there are reservations whether these principles are being translated into the design in the best way possible to serve both existing residents and new tenants.

Kind Regards,

Angela Wu

## Appendix C - Examples of ideas that could be integrated in the PPPS

### Extracts from Sidewalk Labs

The design team is encouraged to review the [Urban Innovations presented by Sidewalk Labs](https://storage.googleapis.com/sidewalk-toronto-ca/wp-content/uploads/2019/06/23135715/MIDP_Volume2.pdf) for the City of Toronto for inspiration on future versions of the PPPS. The document can be accessed at:

[https://storage.googleapis.com/sidewalk-toronto-ca/wp-content/uploads/2019/06/23135715/MIDP\\_Volume2.pdf](https://storage.googleapis.com/sidewalk-toronto-ca/wp-content/uploads/2019/06/23135715/MIDP_Volume2.pdf)

### Diagram A

Example of mass-timber podium with traversable green space accessible by the public. This would be more appropriate for built form by the water in proposed development areas of the PPPS. (Image courtesy of Google Sidewalk Labs, rendering by Michael Green Architecture)



### Diagram B

Illustration of a well designed low-mid rise development that could be implemented in lieu of tower structures.

Things to note include:

- Human scale built form
- A blend between built form and public spaces
- Accessible water line that is not overshadowed by towers

(Image courtesy of Google Sidewalk Labs)

