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PYRMONT NSW 2009

20 October, 2020

Mr Steve Driscoll,
Pymont Peninsula Place Strategy,
Department of Planning Industry & Environment,
Locked Bag 5022,
PARRAMATTA NSW 2124

Dear Steve,

I apologise for the delay in sending you our comments on some of the submissions made by other entities on the draft Pymont Peninsula Place Strategy but hope you will take them into account when finalizing the Strategy.

The draft Strategy identifies 4 Key sites in which towers on podiums will be permitted (irrespective of the aspirations captured in many of the 10 Directions). Draft Direction 2 – Jobs and Industries of the Future (supported as most important by 40% of respondents to the survey) has been swapped with the former Direction 1 – Development that complements or enhances the area (supported as most important by 63% of respondents) and it appears that this has been taken by some respondents to the draft PPPS as enabling towers all over the Peninsula.

Our comments on some of these proposals is as follows:

The Star – We note that The Star is making a case for the almost doubling of the Northern Tower proposed in the draft PPPS on the basis that the Ritz-Carlton needs more space to render it an economic proposition as a 6-star hotel. Whilst we remain fundamentally opposed to both towers as proposed in the draft Strategy, we ask why there is a need for the Northern Tower at all. It is our view that it should be possible for the Ritz-Carlton to accommodate its high roller visitors in upper floors of a substantially lower building located on the Southern side of Union Street. At a lower height guests could still command spectacular views of the CBD and the harbour, and the Ritz-Carlton could still incorporate all the luxury fittings appropriate to a 6-star hotel. And with no tower near the foreshore, solar access would be maintained to both public spaces and private residences.

We do support The Star's advocacy for the entry to the Pymont Metro Station to be located in the Southern site which would also be appropriate for provision of a 24/7 street-level police station.

Manly Fast Ferry – We strongly support the proposals for provision of ferry services to serve the Pymont Peninsula as outlined in this submission. In particular, we support such services linking the Peninsula to Blackwattle Bay, White Bay and Circular Quay. We would, however, recommend a ferry stop at the wharf at Pirrama Park, rather than that off Cadi Park, as it is more centrally located. We also support the location of back-of-house facilities in Blackwattle Bay, adjacent the current Poulos Bros site which is proposed to continue to be zoned for Commercial use. The location of this facility should be such



that it does not inhibit the operations of the passive boating communities, currently located in the Bank Street Public Recreation Area.

Dexus, 100 Harris Street – This building is situated in the heart of Pyrmont Village and is an exemplar of excellence in the conversion of a heritage building showcasing “the older built form and the sub-precinct’s layers of history” (PPPS p 74). This submission proposes to increase its height (presumably by building over the existing structure), contrary to the priorities for the sub-precinct (“ensure new development complements to low-medium rise built form, heritage items and conservation areas, and the special qualities of Harris St” (p75). We note the comment (p74) that “higher densities are not likely to complement the character and sense of place of the Pyrmont Village”, with which we concur.

Emag Apartments, 32-34 Bunn Street – This site appears to sit within the Tumbalong Park sub-precinct. Whilst Darling Harbour has been redeveloped in a rules-free planning environment, enabling construction of buildings which have walled off this area from Pyrmont and Ultimo, development in the area West of Darling Drive has been undertaken within the provisions of the Sydney LEP, DCP and other planning instruments such that the character of new developments “complements and enhances” the former wool stores and warehouses which have been converted to residential and commercial uses. Emag proposes to redevelop the site currently occupied by a 9-storey residential building with 87 strata titled apartments held in its ownership, by constructing a 30-storey residential tower on top of a 5-storey commercial podium. Such a development would overwhelm and overshadow neighbouring residential apartment buildings and would severely compromise the current character of the adjoining sub-precinct.

E Pty Ltd, David Khedoori, 12 Pyrmont Street – Not to be outdone by Emag, the owner of 12 Pyrmont Street proposes buildings reaching to heights of RL 162m rivalling those on the key sites of Harbourside and The Star, thus demonstrating if you open the floodgates to towers, inevitably much of the Peninsula would be infested with them, thus destroying the character of existing low-medium rise built form, heritage items and conservation areas.

Visionland, 26-32 Pyrmont Bridge Road – In contrast to the foregoing, Visionland appear to be proposing a relatively modest 9-storey redevelopment of its site, not far from the site of the proposed 51-storey Star tower. The building, located within the Pyrmont Village sub-precinct, does not appear to have heritage attributes, but is opposite the heritage fire station and nearby warehouse, but, sensitively designed, possibly with street set-backs, could be envisaged as complementary with existing built forms. It should be noted that the City of Sydney has recently rejected a proposed 10-storey redevelopment of a site at 13 Union Street. Pyrmont Action supported the development application as complementary with existing buildings.

Citi 88, 86-92 Harris Street – We are alarmed that the landowners of this site, having gained approval for a commercial development which complemented the building heights along this stretch of Harris St, in the heart of the Pyrmont Village sub-precinct, is now proposing a substantially higher building which would be totally out of character with current built forms in the sub-precinct. If permitted it would block light and sun from



existing apartment buildings, and may even overshadow Union Square and the backyards of the Georgian terraces lining the square. Privacy of residences in Pyrmont Street would also be compromised. We note that the developer has held private conversations with Clare Swan and yourself “where the specific opportunities of the site were discussed”. Noting that community representatives have provided comments on and input to the approved DA, and attended Land & Environment Court site meetings which have resulted in minimizing adverse environmental impacts, we are dismayed that we have not been consulted by DPIE on this proposed amendment. We strongly oppose any change to the existing statutory planning control to enable development of greater height and density in this sub-precinct.

In conclusion, we strongly oppose the introduction of high towers to the Pyrmont Peninsula. The current mix of low to medium height residential and commercial buildings, together with re-purposing of heritage buildings of character and charm, is appropriate for the Peninsula. We reject the notion of Pyrmont and Ultimo as extensions of the CBD. The narrow streets are totally unsuitable for tall towers which have turned the CBD into a dark and uninviting place, with tunnels for roads, and lifeless streetscapes. We envisage the Peninsula having a form which is intermediate between the high rise CBD and the low-rise Glebe Peninsula.

The identification of disparate Key Sites as suitable for high-rise towers has generated the precedents long desired by the development lobby. Higher density can be achieved without towers. Just look at densely populated London and Paris which have retained their charm and liveliness, further enhanced by the many large parks scattered throughout, and pedestrianized laneways accommodating cafes, restaurants, and quirky retail outlets. The people of London and Paris place a high value on retention of their cities' character and history, and they attract the rest of the world to their doors. We urge the Department to resist the urge to permit boring and unimaginative towers which can be found in any lifeless, modern city around the world, and to ensure that the very form and character which has attracted many thousands to live and work in the Peninsula, is enhanced, not trashed.

Yours sincerely,

Elizabeth Elenius
Convenor

