

25 September 2020

Mr Jim Betts
Department of Planning, Industry and Environment,
Locked Bag 5022,
Parramatta
NSW 2124
pymont.peninsula@planning.nsw.gov.au

Dear Mr Betts,

Submission to the Draft Pymont Peninsula Place Strategy

GPT - 48 Pirrama Road, Pymont

We write as the long term leaseholders of 48 Pirrama Road, Pymont (the site) also known as Workplace 6. GPT welcome the release of the Place Strategy and the opportunity to engage with the Department of Planning, Industry and Environment as they finalise the strategic planning direction for the Pymont Peninsula.

The development of a Place Strategy for Pymont represents an ideal opportunity to facilitate the ongoing renewal the area.

In summary, GPT:

- Supports the overarching intent of the Place Strategy to position the Peninsula as a global attractor that builds on its existing characteristics and locational attributes.
- Supports the identification of 48 Pirrama Road as a site that is 'capable of change' with the capacity to contribute to significant growth; however, note that this is not reflected in the Structure Plan which excludes the site from the 'indicative renewal zone and tall building cluster'. It is recommended that the Structure Plan's 'indicative renewal zone and tall building cluster' map is revised to incorporate 48 Pirrama Road and the next iteration of the Place Strategy provides further clarity regarding the meaning of 'capable of change'.
- Would appreciate the opportunity to work collaboratively with the Department as part of the master planning process to determine the appropriate development parameters for 48 Pirrama Road and would like to meet to discuss GPT's aspirations for the site.

1.0 The Site and its Context

The site is located at 48 Pirrama Road (Lot 1012 DP 1145894) on the Pymont Peninsula, to the west of Darling Harbour. It is a large landholding of approximately 5,174 sqm located immediately north of the Star casino. The site is bounded by Trouton Place and Metcalfe Park to the north, Pirrama Road and the casino to the south and west, and Pymont Bay to the east. It is located within the City of Sydney LGA and is a short walk to the casino light rail station and an easy walk across Pymont Bridge to the CBD. The site currently accommodates a six-storey commercial building known as 'Workplace 6'. An aerial image of the site and the surrounding area is provided at **Figure 1**.



Figure 1 Site Aerial

Source: Nearmap and Ethos Urban

2.0 The Vision, the Strategic Directions, and the Five Big Moves

The Place Strategy (2020) establishes a clear vision for Pyrmont Peninsula:

In 2041, the Pyrmont Peninsula will be an innovative, creative and cultural precinct and an engine room of the Eastern Harbour CBD. It will connect to the Innovation Corridor and other innovation and job precincts via Sydney Metro and complement the Sydney CBD.

GPT broadly support the vision for Pyrmont Peninsula established by the Department, however, recognise that implementing the vision will require time and significant investment, as well as some flexibility in its implementation to deliver. The 10 Directions that have been identified to guide growth to 2041, with the intent of addressing matters of strategic economic, social, and environmental significance in the Pyrmont Peninsula are all supported. These are supplemented by 5 Big Moves that are broader and more strategic in their delivery that are again supported at a high level. In short, 48 Pirrama Road has the potential to make a significant contribution to the achievement of the strategic directions for the following reasons:

- It is a large site under single ownership in the heart of the Darling Island sub-precinct and can deliver major employment floor space capacity, shops and services in a high amenity harbour side location. The site is immediately adjacent to the casino which is identified as a key site and an area suitable for taller buildings. 48 Pirrama Road has locational attributes similar to the casino site and is a site suitable for taller buildings subject to detailed investigation.
- The existing building is an exemplar sustainable office development and has been awarded a 6 star Green Star rating for design and a 5 star NABERS energy rating. GPT have demonstrated ability to deliver leading edge sustainable and adaptive buildings across many parts of Sydney and Australia.

- The site is connected. It is close to the existing light rail service and proximate to the metro investigation area. It is a sustainable location for additional floor space.
- The site is located within an area with a high-quality public domain. Future growth can leverage, activate, and contribute to the existing high-quality public domain.

3.0 The Structure Plan

Shown in **Figure 2** below, the draft Structure Plan sets out the spatial interpretation of the vision and 10 Directions. The draft Structure Plan establishes a framework for the Peninsula with movement and open space networks linking neighbourhoods and places, while setting the context for the future sub-precinct master planning.



Figure 2 Pyrmont Peninsula Structure Plan
Source: NSW Department of Planning, Industry and Environment

The draft Structure Plan “sets the foundations to take the Peninsula to the next level as a jobs hub, while ensuring key placemaking and public benefit outcomes are secured with growth and change”. The Department indicate that this is intended to be achieved through the delivery of:

- A diverse, connected, restorative public domain;
- An integrated movement network;
- Ridgetop village character and community;
- Significant renewal sites at parks and harbour edge.

GPT broadly support the draft Structure Plan, particularly the Department’s focus on “significant renewal sites at parks and harbour edges”. As recognised above, the Structure Plan also identifies 48 Pirrama Road as a site ‘capable of change’. GPT supports this designation being given more weight and recognition in the revised Place Strategy and request the site’s location is included in the areas for ‘renewal zones’ and ‘tower clusters’ – where it is currently excluded (refer **Figure 3**). As outlined under **Section 2.0** above, there are strong reasons why the site should be included in the renewal zones and tower clusters areas.

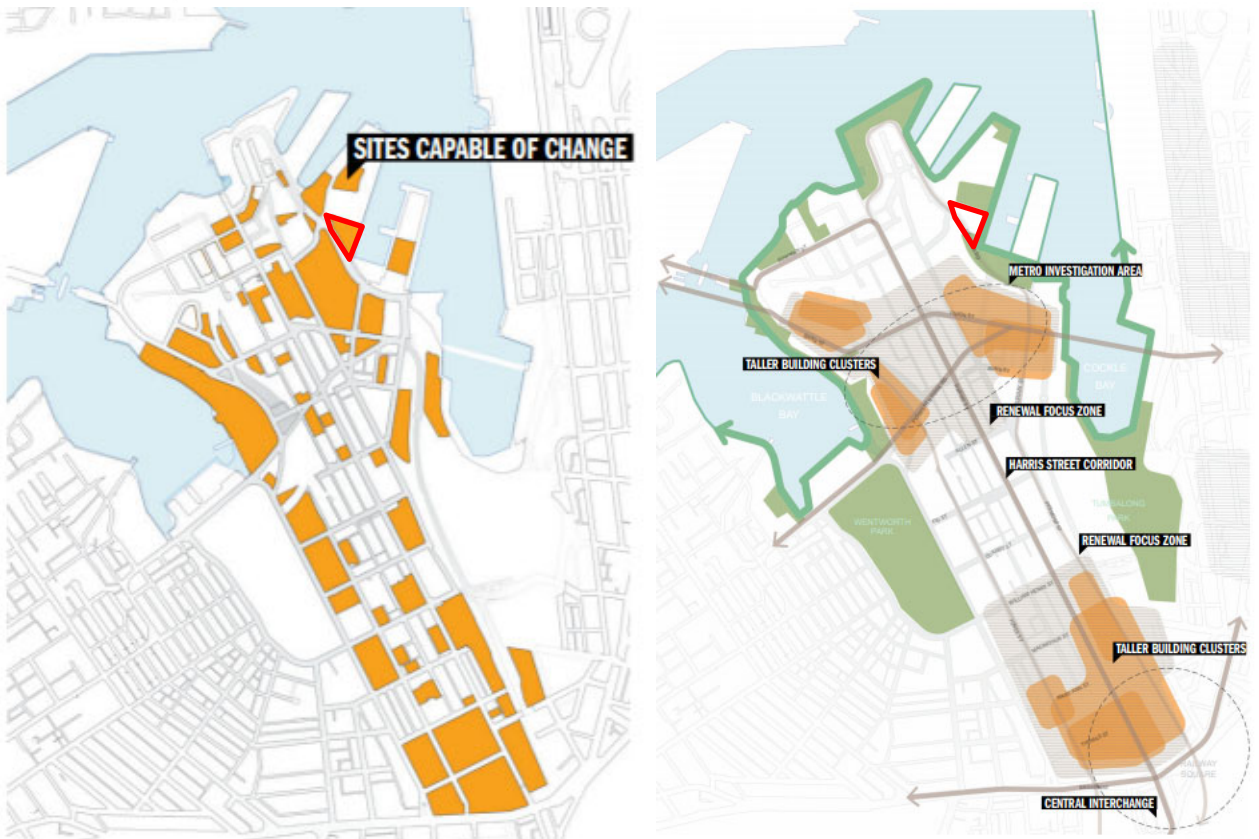


Figure 3 Sites capable of change & Taller Building clusters (approx. site location shown red)
 Source: Hassell, July 2020

3.1 Peninsula Character Height Strategy

The urban design analysis undertaken identifies an indicative height strategy that seeks to “reinforce the special historic character of the peninsula” through the stepping down of building heights from the peninsula to the harbour edge to protect this layered character and proposes to implement the following key strategy:

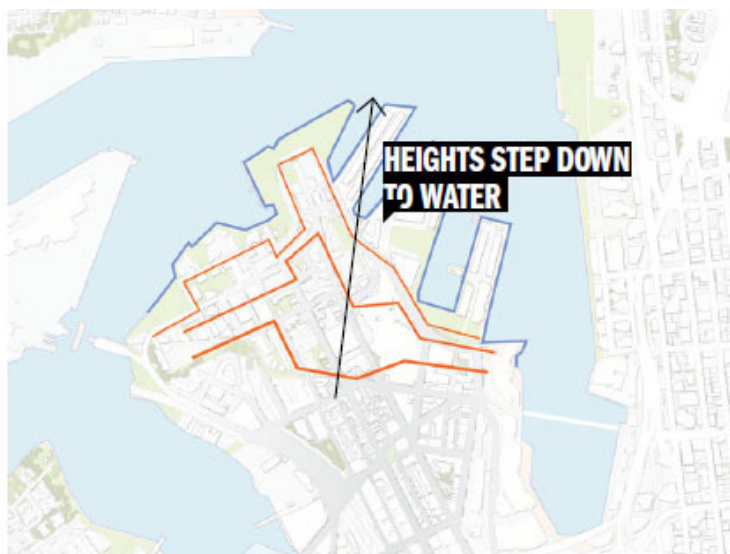


Figure 4 Pyrmont Peninsula Structure Plan Height Strategy
 Source: HASSELL, 2020

It is acknowledged that the stepping principle supports planning for unique places, however, this principle applied together with the sun access plane principle is counter to the overarching vision of an *“innovative, creative and cultural precinct and an engine room of the Eastern Harbour CBD”*. The application of these two principles in their current form would prevent 48 Pirrama Road from making any significant contribution toward the economic revitalisation of the area in the future and is contrary to the objective to accommodate large scale commercial floor space in the Darling Island sub-precinct.

We request that the Department reconsiders the specific application of this design principle in relation to the Workplace 6 site.

4.0 Darling Island Place Priorities

The Darling Island Place Priorities provide finer grain objectives for the future direction of the sub-precinct. GPT are generally supportive of the Darling Island place priorities and believe the focus on enhancing the safety, connectivity, walkability of the public domain will have a significant and positive impact on area.

GPT welcome the opportunity to be involved in a collaborative process with the Department to establish new planning controls for 48 Pirrama Road. Site specific design analysis that builds on the principles and initial work undertaken by the Department is necessary to determine the appropriate design parameters for the site. Future analysis will inform the master planning process and will contemplate and test the place priorities regarding matters such as view protection, building height transitions and public domain amenity. GPT seek to meet with the Department on this matter and determine how best their commercial and public domain aspirations could be included in the sub precinct master-planning process.

5.0 Implementation

The objective of simplifying the planning framework for the Pyrmont Peninsula is welcomed. In this regard, the Department is encouraged to also lead the process of any future amendments to planning controls required to implement the masterplan for the precinct. It is considered appropriate for the Department to continue the masterplan work through to the rezoning phase to ensure the continuity and delivery of the desired masterplan outcomes.

6.0 Next Steps and Conclusion

GPT welcomes the opportunity to work with the Department on the development of the Place Strategy and look forward to ongoing dialogue on the subsequent detailed master planning and planning control implementation.

We acknowledge that the purpose of the Place Strategy is to develop a vision and plan which seeks to balance the area’s unique heritage, liveability and long-term sustainability with the Peninsula’s continuing evolution that maximises its economic and social potential. In this regard, the recommendations in this submission speak to the overarching driver for the Peninsula to become an attractor for investment and how GPT’s site can best contribute to those goals. GPT recommends that:

- The Structure Plan’s ‘indicative renewal zone and tall building cluster’ map is revised to incorporate 48 Pirrama Road, and the next iteration of the Place Strategy provides further clarity regarding the meaning of ‘capable of change’.
- That the Department reconsiders the specific application of the design principle of stepping height down to the Harbour in this location bearing in mind the potential significant height in the adjacent zones. The built form objectives could also appropriately respond to principles of solar access to key areas of public space.

- The Department is encouraged to lead the process of any future amendments to planning controls required to implement the masterplan for the precinct. It is considered appropriate for the Department to continue the masterplan work through to the rezoning phase to ensure the continuity and delivery of the desired masterplan outcomes.

The Greater Sydney Region Plan identifies the Western Harbour Precinct and Pyrmont Peninsula as an emerging innovation corridor and a western gateway to the global Sydney CBD. With some inherent flexibility, the aspirations for high job numbers can and be delivered at this strategically important site.

GPT welcome the opportunity to provide further information to the Department as it finalises the Strategy and look forward to a continued dialogue. GPT would seek to meet with the Department on this matter and determine how best their commercial and public domain aspirations could be included in the sub precinct master-planning process.

Should you require any further information in relation to the matters raised in this submission, please do not hesitate to contact me on the details provided below.

Yours sincerely,

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Greg Mannes
Project Director