

From: [Robert Gavagna](#)
To: [DPE CSE Pymont Peninsula Mailbox](#)
Subject: Pymont Peninsula Place Strategy
Date: Monday, 31 January 2022 3:16:02 PM
Attachments: [RG Blackwattle Bay SSP sub V2.pdf](#)
[Pymont Peninsula Place Strategy Blackwattle Bay.msg](#)
[PPPS - Union Square v2.pdf](#)

For the kind attention of Mr. Steve Driscoll,
Team Leader
Infrastructure NSW

In response to your request for final submissions regarding the Pymont Peninsula Place Strategy,

I have taken the liberty of attaching my earlier submission regarding Blackwattle Bay planning proposals.

I have also, by way of separate attachment, added a few additional thoughts for your possible consideration.

And separately, on the matter of our Pymont Village itself, I attach a proposal that had been carefully thought through by Mr. Bob Huntsman

(now deceased). Bob correctly identified Union Square as the heart of our Pymont village. It's clear better use could be made of this 'town square'.

His sketch provides the basis of how best this goal might be achieved.

Kind Regards,
Robert Gavagna
Pymont

Mr. Steve Driscoll,
Team Leader,
Infrastructure NSW

RE: THE BLACKWATTLE BAY STATE SIGNIFICANT PRECINCT STUDY

By way of introduction, I am an active member of the local Pymont community. I helped form and later chair the Pymont Bendigo Community Bank and have served as a representative for Pymont on the Blackwattle Cove Coalition Committee and in both series of Bays Precinct community forums. I have no financial interest in any element of the proposed plan, other than as a resident of Pymont.

In this context I offer my submission for your consideration.

I believe the plan concept for this waterfront redevelopment is imaginative and exciting. The plan seeks to revitalise three old, tired, and industrial looking sections of Bank Street; the Bridge Road foreshore now in government hands, the adjacent government property presently leased by Sydney Fish Market Pty Ltd (SFM), and three private freehold landowners (PLO).

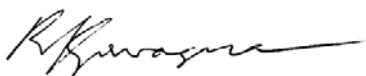
However, there are important obstacles to be overcome if the plan is to achieve a desirable and equitable outcome. My principal objections are to the plan's exaggerated level of development, be it size of buildings or consequential residential intensity. The huge structures proposed, do not sit at all well with the surrounding terrain nor with the local building environment of the Pymont Peninsula.

Most of all I object to the plan's gross unfairness towards our local residents.

The following pages cover the more obvious points of contention whilst touching on the covert pressure exerted by developer and private vested interests. These points include:

1. Location
2. Population Density
3. Traffic and Access
4. View Obstructions
5. Private Land Holders (PLO)
6. Incoming Resident Needs
7. Repeal / Replacement of Existing Planning Legislation

Despite my disagreement with the plan as detailed in the points attached, there are some aspects that are worthy of applauding not the least being the incorporation of a continuous foreshore promenade around Blackwattle Bay. I touch on these in my concluding remarks.



Yours Sincerely,
Robert Gavagna

AREAS OF CONCERN WITHIN THE BLACKWATTLE BAY SSP STUDY PLAN

In making this submission, I wish to draw your attention to the following items that need further consideration and community engagement.

1. LOCATION

The location of the INSW redevelopment plan for crown land, presently occupied by Sydney Fish Market Pty Ltd (SFM) plus privately owned land on Bank Street, is at the western flank of Pyrmont Peninsula along the foreshore of Blackwattle Bay. This follows the earlier related plan for relocation and construction of a new SFM building on adjacent government foreshore land. Both the new SFM building and the major portion of proposed new residential development will open onto a peak hour heavily congested Bridge Road. The associated problems of this location will be explored within section 3. Traffic and Access.

An alternative community worked plan would have relocated Bridge Road to ease traffic and convert that part of Wentworth Park to a waterfront park.

From the outset it should be noted that relocation of the SFM building from land - to land and water - together with its actual construction, will cost our state government \$750,000,000 (earlier under estimated to be \$250,000,000).

Despite the huge cost to tax payers, it will certainly be of great benefit to the SFM Company and all its share and stake holders and of course to our NSW seafood industry.

However, an alternative approach would have been for state government to call tenders for both related government and privately owned components of the Blackwattle Bay redevelopment. In this way, the cost to state government could have been **zero**! All costs and gains would have rested with the successful redevelopment tenderer.

More consideration by government/DPI&E planning would have averted such a huge loss to NSW taxpayers.

2. POPULATION DENSITY

Apart from location challenges, a major local community concern with the proposed plan is its impact on population density.

Pyrmont Peninsula is already recognised as having one of the densest populations of any Suburban precinct in Australia (presently 15,000 residents). The INSW proposed plan calls for an addition of 1550 apartments, with an estimated influx of 2800 new residents (an increase of around 19% of our population)! By contrast, neighbouring Jackson's Landing occupies almost twice the land area as that taken up by the present SFM site + nearby private land holdings, yet has only 1400 dwellings; twice the area with less dwellings (and not only apartments)!

This INSW new resident number is included in the overarching DPI&E plan for the whole of the Pyrmont Peninsula, to receive an additional 8500 residents once all its current plan proposals are approved and developed (more than doubling our population)!

It seems our planners seek to emulate building densities in such land scarce locations as Hong Kong and Tokyo. However we are not land scarce – not unless there is to be approval for over development of our precious Harbour foreshore. I believe the Department's plan is overly ambitious in its proposed residential density. After all, visitors come here to see our points of difference, not our points of similarity.

Other adverse impacts of such a significant population increase will be considered elsewhere in this submission (especially road traffic and needs of incoming residents).

Counter proposal:

Reduce the height and girth of residential towers and numbers of new residents.

3. **TRAFFIC and ACCESS**

The proposed plan fails to adequately consider the key matters of access and adverse impact on local traffic

Traffic

This is where the first element of the total plan - the proposed SFM building – affects the second element of the plan; redevelopment of Pyrmont Peninsula's western foreshore.

The existing SFM car park has a capacity of 417 car spaces (and 26 truck/trailer spaces). The plan's own figures appear to disclose that 75% of car park spaces are vacated after 15 minutes. Thus, were the car park to be full, this would mean a conservative hourly **minimum** of 300 car movements outbound, **plus** a corresponding hourly minimum of 300 movements inbound. In short, on a busy 8 hour day, this would represent around 5000 car entries/exits impacting on already busy Bridge Road traffic!

Additionally, as the bulk of the proposed cluster of very tall apartment buildings is to be located on the site of the present SFM building - and many of its residents would have cars – this would add even more daily car ingresses/egresses to/from Bridge Road traffic and its notorious traffic pinch points: Wentworth Park Road, Wattle Street, Bank Street and Harris Street.

Access

Your plan's forecast is for a rise in SFM visitor numbers from the present 3,000,000 per annum to 6,000,000 within a few years. Your assumption that visitors will arrive primarily by public transport is based on a very doubtful premise. Despite the additional SFM 'captive' market to be generated by 1550 new apartments, please consider the following limitations:

Your own figures reveal the new SFM building will have absolutely no more car park spaces (417) than exist at the present SFM location. Neither will there be more light rail stations than presently exist. The new Metro station (years away) will be quite a walk from the new SFM and you are leaving a ferry option to the private sector. Of course you could provide additional bus services. But do all these various forms of public transport easily connect with visitor residences, especially those in more distant suburbs?

The fact is that most SFM visitors are there to buy seafood! Some do visit for a meal (and this proportion will surely increase), some visit to enjoy the atmosphere, but the majority are there to buy seafood. After all, this is its primary purpose and why other regional shopping centres have very large car parks.

Imagine carrying your seafood esky home in the light rail, the metro, the ferry or the bus!

Counter proposals:

Reduce the height & number of apartments. The highest should be 26 – 30 storeys at most, in keeping with the highest of neighbouring Pyrmont residential buildings.

Consider providing additional and practical underground car parking.

4. **VIEW OBSTRUCTIONS**

We are all attracted by views of beauty, be they features of nature, history or landmarks. This sense of admiration is inherent in our human nature.

Blackwattle Bay is a tranquil and beautiful cove within Sydney Harbour. Both opposite shores of Blackwattle Bay look down on or across its glimmering waters. The end of our

peninsula is connected to Glebe Island and beyond by the striking Anzac Bridge. Surely the aim should be to enable as many of us as possible to easily see and enjoy these beautiful views. Why then should Planning seek to restrict views of water, bridge and the eventual SFM building and deny a large portion of these existing views to local residents?

As I understand it, the first tenet of good planning for a hill site (such as Pyrmont Peninsula) is to have perimeter shore line buildings rise to a level lower than the height of the next higher located building, and so on up to the highest point of the hill. After all, this concept is in line with common sense. Where then is the equity in having new foreshore buildings stealing the views and values of existing buildings? In fact, this is contrary to existing legislation (City West and Sydney Harbour catchment SREP sections 25 and 26).

Your own photo montage images convey the grotesque shock of disproportionately large buildings, completely out of line with existing building surrounds. To suggest the shore line of Pyrmont peninsula should be regarded as part of the Sydney CBD is ridiculous. How can it be justified to propose that buildings of similar height and girth as those in our central CBD, should be built right beside the waters of suburban Blackwattle Bay? A look across the narrow Bay to the Glebe suburban shoreline will show what an outlandish contrast these proposed buildings would create!

Major residential building cluster *assuming 3.47 metres per storey.

Let us look closer at these proposed huge residential towers.

The major cluster is to be positioned on the present SFM site. The three tallest buildings will range in height from 32 to 45 stories*. We know that such intensely developed residential clusters result in view and sun blocking as well as wind tunnelling. Surely we have also learned that such residential clusters can pose a serious danger for virus spreading!

We know too that over shadowing is a problem for surrounding buildings and their residents. Yet this particular problem does not seem to have been adequately addressed.

Minor residential cluster

The minor cluster of tall buildings is to be along Bank Street. The plan is for five tall buildings of varying girth. Four of these are to be in line, directly alongside the approach to Anzac Bridge. Their heights are either from 19 – 26 storeys or more. One could **add** four storeys to each building according to how one reads the explanatory notes. All five buildings would sit at a privileged 'ringside' location between the Bridge approach and Bay waters. It would be almost impossible to see over these buildings in order to glimpse Blackwattle Bay waters or the iconic new SFM building, as the breadth of Blackwattle Bay is simply too narrow. Additionally, some of these proposed buildings have very broad floor plates. This girth creates difficulty in securing 'in between building' views of Blackwattle Bay waters.

The same view obstructing impact will also affect all Anzac Bridge users!

Imagine having such view impediments of the Sydney Harbour Bridge!

Where is the sense in minimising contra views between Anzac Bridge and the SFM building?

Why would local residents agree to what is effectively a theft of their views and property values? Where is the equity in this plan?

Counter proposals:

Reduce the height of proposed large residential buildings, especially those alongside Anzac Bridge approach. All five should be no more than a maximum of 12-15 stories high. Reduce floor plates for most of these buildings. This will facilitate 'in between building' views

5. PRIVATE LAND HOLDERS (PLO)

There are three privately owned properties along Bank Street, and the proposed plan is for these three properties to be re-zoned to accommodate five tall buildings on wide footprints. Once rezoned, the PLOs will be rewarded with a windfall worth hundreds of millions of dollars in addition to the returns emanating from the five proposed residential buildings.

Poulos Bros Seafoods Pty Limited.

Poulos is said to be the largest shareholder within Sydney Fish Market Pty Ltd.

They have an office, warehouse and related facilities on long held Bank Street freehold land.

Celestino/ Baiada Poultry Pty Ltd.

This company is a significant real estate developer and poultry wholesaler.

Not many years ago, it acquired the Bank Street property (with warehouse, related facilities and offices) from former SFM shareholder Bidvest P/L (now Bidfood).

Hanson Australia Holdings Proprietary Limited.

Hansons /Hymix are subsidiaries of German company Heidelberg Cement.

This company is a long-term owner of Bank Street property. It seems its stated aspiration is to retain a compressed concrete batching plant on site with twin tall residential towers above.

It's understandable these private landowners seek to take full advantage of proposed changes in re-zoning. But this benefit should be balanced against the equally legitimate demands of existing residents and property owners, who stand to lose a great deal of their existing views and possibly even their property values.

A windfall loss doesn't balance a windfall gain.

Counter proposal:

Use the words taken from your plan:

....."see to development potential being distributed fairly & impartially".

6. INCOMING RESIDENT NEEDS

With such a proposed sudden increase in the population of Pyrmont peninsula, it's clear this will generate a need to boost inevitably inadequate facilities:

Parks

More open area will be needed for recreational use by resident adults and children.

Schools

The increase in population will create need for additional local school facilities.

Counter proposal:

I Support the plan to open Wentworth Park as a complete park; remove walls around present greyhound track and centre sports field. Remove ancillary buildings.

Seek to expand school facilities at Ultimo primary school and Glebe secondary campus.

7. BBSSSP PROPOSAL TO REPEAL / REPLACE EXISTING PLANNING LEGISLATION

Whatever happened to the Liberal State government undertaking to return planning powers to the people! Great rhetoric, but now we are heading in exactly the opposite direction.

Consider the following present protective legislation:

Sydney Regional Environmental Plan

SREPP Section 25 Foreshore and waterways scenic quality

The matters to be taken into consideration in relation to the maintenance, protection and enhancement of the scenic quality of foreshores and waterways are as follows:

- (a) The scale, form, design and siting of any building should be based on an analysis of:
 - (i) The land on which it is to be erected, and
 - (ii) The adjoining land, and
 - (iii) The likely future character of the locality.
- (b) Development should maintain, protect and enhance the unique visual qualities of Sydney Harbour and its islands, foreshores and tributaries.
- (c) The cumulative impact of water-based development should not detract from the character and adjoining foreshores.

SREPP Section 26 Maintenance, protection and enhancement of views

The matters to be taken into consideration in relation to the maintenance, protection and enhancement of views are as follows:

- (a) Development should maintain, protect and enhance views (including night views) to and from Sydney Harbour,
- (b) Development should minimise any adverse impacts on views and vistas to and from public places, landmarks and heritage items,
- (c) The cumulative impact of development on views should be minimised.

But now it seems the Department's aim is to repeal existing legislation so as to permit creation of such excessively large and view diminishing buildings along the Pyrmont Peninsula flank of Blackwattle Bay. In short, the Department seems to indicate it does not want to be restricted by the existing relevant master plan.

More concerning is a third proposal which seeks to confine major development proposals (>\$10 million) to control of a single Planning Secretary; a planning Tsar if you will. This might facilitate speedy process for significant developments, but at what cost? As efficient as quasi dictatorship is made out to be, just look at the opportunity for influence by vested interests. This is why we presently enjoy the benefits of argument and counter argument; the very corner stone of democracy. It may be less 'efficient' and more time consuming but it is considerably more likely to result in a fairer and more just outcome. Please refer back to above Section 1. Location.

Moreover, should the Department succeed in repealing existing protective legislation, the added concern for our residents would be their vulnerability to possible applications of equally excessive planning conditions elsewhere on the Pyrmont Peninsula!

Counter proposal:

Government to deny such legislation change requests. Seek to achieve meaningful compromise on both sides of the planning arguments.

Finally, aside from legislative matters, my own personal lament is that our grand new SFM building will occupy too much space over Blackwattle Bay waters. Add to this all other view obstructions detailed earlier, and our future views of Bay waters will be restricted indeed.

CONCLUSION

On a positive note!

In conclusion, despite my above areas of disagreement with the plan, there are some aspects that are worthy of applauding and these include the following favourable aspects:

Incorporation of a continuous foreshore promenade around Blackwattle Bay

The proposed completion of a foreshore pathway sufficiently wide to allow easy passage for both pedestrians and cyclists around Blackwattle Bay and complete the long awaited connection between Rozelle Bay and Sydney's Botanical gardens.

Commitment to inclusion of open space

This is crucial for the health and social interaction of visitors, local residents and workers. Such open space provides people with a relished relief from masonry and glass.

Due and appropriate acknowledgement of our First Nation's People

An open air gathering place near the site of the proposed SFM building will enable conduct of Aboriginal celebrations and facilitate community familiarisation with Aboriginal culture.

Provision for affordable housing

You have made provision for a percentage of proposed apartments to be available as affordable housing. Notwithstanding, the actual percentage will be contentious.

Thank you for the opportunity to provide you with this my submission on what is a very large and complex plan for the long overdue redevelopment of Blackwattle Bay.

Robert Gavagna

Pymont Peninsula Place Strategy

Blackwattle Bay

For the kind attention of Mr. Steve Driscoll,
Team Leader

Infrastructure NSW

Dear Mr. Driscoll,

From the outset, I have to say that anyone living on the western side of Pymont Peninsula would have their Blackwattle Bay and western views (and property values), very seriously compromised by the most audacious of the plans being considered.

Moreover, anyone who lives elsewhere on the Peninsula would see the possibility of such draconian law changes in planning, wreaking a similar possible effect on their futures.

I have managed to read through as many of the provided planning pages as was realistic.

Aside from the Sydney Fish Market building itself, the community's main points of concern are to do with what are clearly exaggerated over developments planned by the appointed developer, for the crown foreshore land on which the present SFM building & car park sit and the unjustifiably large and intense rezoning plans for the three private land owner properties (PLO) along Bank Street.

The principal developer Multiplex has been freed of the cost to relocate and construct the massive new SFM building.

As is plainly obvious, the cost of building over water is huge; originally estimated to be \$250,000,000 and already revised to be \$750,000,000!

But this huge task is being taken on by our state government (or more precisely, by its tax payers).

This allows the appointed developer to focus on extracting the best possible return it can achieve through development of this crown foreshore land.

Let's then look at the Private Land Owners (PLO).

These are the three entities that own property on the Blackwattle Bay water side of Bank Street: This trio stands to make a huge windfall profit from the proposed rezoning of their existing Bank Street properties.

I have no problem with this principle.

However, it is the exaggerated degree of rezoning/development with which I do find a problem, especially when Pymont and its residents stand to suffer.

Hymix Concrete is part of Hanson Australia Holdings P/L, which is in turn a subsidiary of the German company Heidelberg Cement.

I read the draft proposal lodged by their appointed proponent 'Ethos Urban', (13 September 2020), for twin residential towers to sit atop a 15 metre high podium.

This podium to contain a compressed concrete batching plant!

The matter of height limitation for these twin residential towers was contentious as was the possibility of an adverse impact on the much touted and awaited waterfront promenade.

Poulos Bros Seafoods Pty Limited. This company is said to be the largest shareholder within Sydney Fish Markets P/L (thought to be a 25% holding).

Its apparent rezoning is for two x 26/30 storey buildings for their property. Presently, this company has only a warehouse and offices on their Bank Street site.

Baiada Celestino. This organisation came into the picture not that long ago. It is a huge chicken wholesaling company

(Lilydale and Steggles) which also operates in the field of property development. It purchased only the land held by the company then known as Bidvest (the second largest shareholder within the SFM). That property also has a warehouse and offices. Its apparent rezoning would facilitate two x 26/30 storey buildings! Altogether this avenue of proposed tall buildings would absolutely dominate the outlook over Blackwattle Bay. Additionally, as the buildings are based on large floor plates, this means very limited through view to Blackwattle Bay. Effectively, the six buildings would serve as Bay view blockers for local residents and for Anzac Bridge users. If such an exaggerated development should ever proceed, it might be worth an equal exaggeration for the state government to consider imposition of a 'value capture' tax. At least, in this way, all vested interests would share their rezoning windfall gains with the community and government to help NSW taxpayers pay for construction of the new SFM building!

Friends of the Pyrmont Community Centre: Union Square

Three years ago we proposed to reconfigure and reanimate Union Square. As the PPP Strategy does not take the opportunity to make Union Square more accessible and usable by the public, we restate our ideas.

Union Square is the community's natural outdoor venue. It comes into its own on ANZAC Day and for Christmas Carols when seats, awnings and a sound system are provided by local bodies. Due to its present configuration, however,

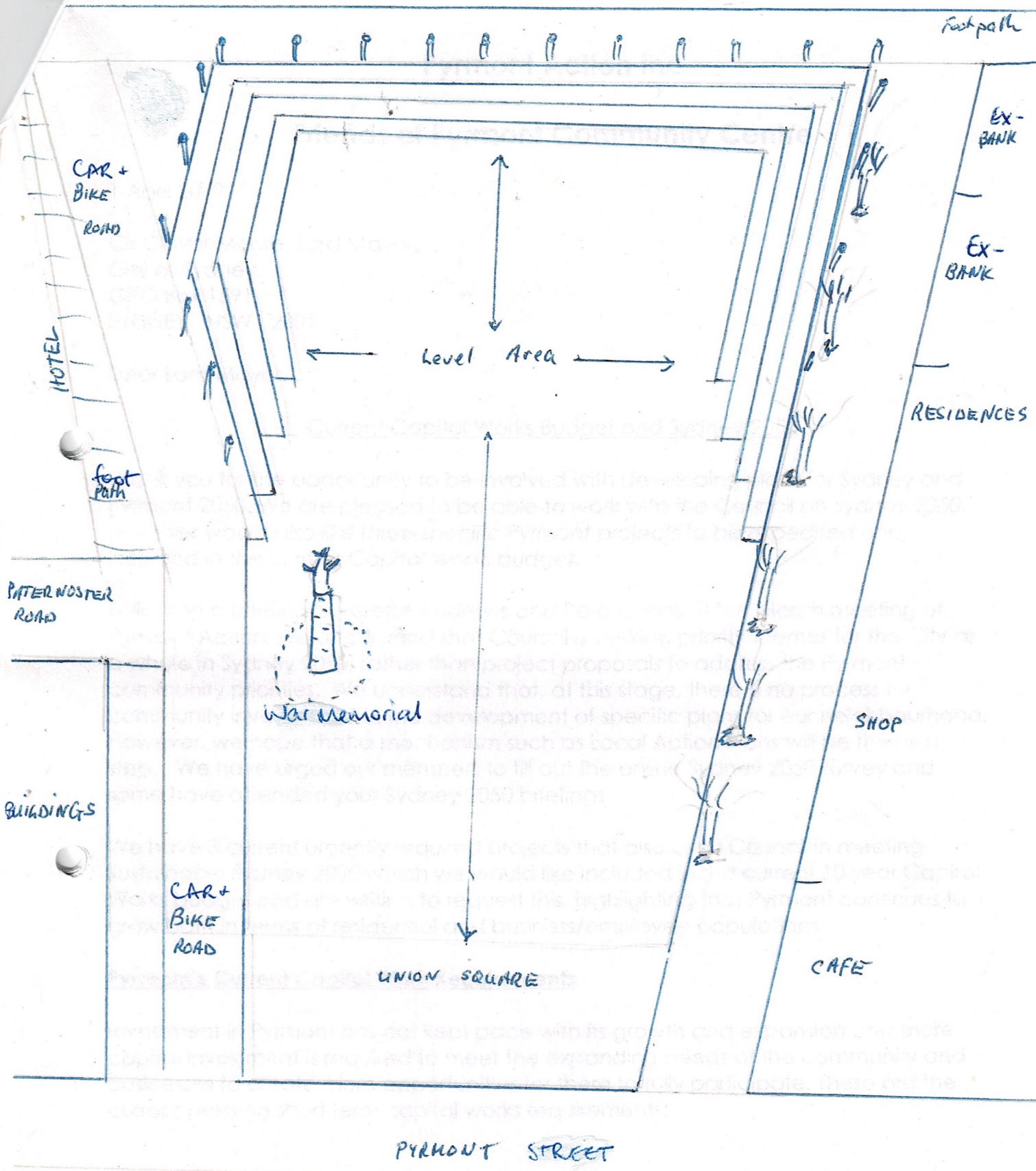
- it does not lend itself to other community or commercial occasions;
- there are many steps from top to bottom, not well marked, and many people have tripped or fallen on them;
- level spaces are few and narrow;
- the largest level space is occupied by the war memorial.

These concerns can be addressed, so that Union Square can be used by the community for concerts and other events, and by businesses for regular markets and pop-up events.

The main obstacle is the central position of the War Memorial. It was moved here from its original site in 1998, when this part of Union Street and Pyrmont Bridge were closed to vehicles. It would not be difficult to move it again, to the narrow end of Union Square. The Memorial would command the view from Harris Street to Pyrmont Street, allowing the wider part of the square to become a venue for concerts, plays, pop-up markets etc. The social and commercial benefits would greatly outweigh the cost of the work.

MILLER STREET

HARRIS STREET



- || posts
- || trees

Notes
Remove steps from centre
Trees obscuring statue
Absorb path next to Bike lane
Move column from trees