



Department of Planning and Environment

Our ref: DOC22/74529

Amy van den Nieuwenhof
Senior Planning Officer
Planning Group
Department of Planning and Environment
4 Parramatta Square
Parramatta NSW 2150

Dear Ms van den Nieuwenhof

Subject: EES comments on the draft Pyrmont Peninsula sub-precinct master plans and draft planning controls

I refer to the exhibition of the draft Pyrmont Peninsula sub-precinct master plans and draft planning controls (the draft masterplan). Environment, Energy and Science Group (EES) considers that the amendments in the draft sub-precinct master plans and draft planning controls have merit and the potential to improve environmental, sustainability and planning outcomes.

However, some aspects of the draft sub-precinct master plans and draft planning controls would benefit from additional review and incorporation of more contemporary data sets, in particular as they relate to climate data, and further detailed consideration of potential flooding impacts associated with increasing the land use intensity.

Detailed comments from EES can be found at **Attachment A**.

Should you have any queries regarding this matter, please contact David Way, Senior Conservation Officer on 8275 1324 or David.Way@planning.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink that reads 'S. Harrison'.

03/02/22

Susan Harrison
Senior Team Leader Planning
Greater Sydney Branch
Biodiversity and Conservation

Attachment 1 – EES Comments on the draft Pyrmont Peninsula sub-precinct master plans and draft planning controls

Biodiversity and urban canopy

EES is supportive of the intent of the sub-plan to protect and increase the urban canopy. EES is also supportive of the intention to support other features which would potentially provide benefits in retaining or improving urban biodiversity in the Pyrmont Peninsula, such as green wall and green roof features. EES considers that given the current low level of urban canopy in the peninsula an ambitious target for urban canopy replacement and expansion will provide the best outcomes.

EES considers that there would be additional benefit for this aim to include a preference for native, preferable local, canopy species, as appropriate and feasible, to be used, as set out in the planting list provided in the Pyrmont Peninsula Place Strategy - Biodiversity Study.

However, species will differ in their vulnerability to climate change. EES recommends utilisation of the Climate Ready Revegetation Guide to inform decision making around species selection and planting design. The guide provides instruction on how to use climate change projections to determine the suitability of species and provenance selection.

In amending the planning controls for the identified sites EES considers that it would be important to ensure that likely indirect impacts, such as indirect impacts to areas of retained green space are considered, in particular native bushland, receiving waters and the downstream stormwater systems.

Flooding and waterways

EES notes that a detailed, technical review of the potential flood affectation of the land and the impact of this flooding on the proposal has not been prepared as part of this exhibition.

EES considers that Council and the Department of Planning and Environment should ensure that an adequate review and consideration of flood impacts and potential changes to flood affectation and behaviour as a result of the proposed intensification of land use on the Pyrmont Peninsula is completed. The findings of this review should be incorporated into the Pyrmont Peninsula sub-precinct master plans and planning controls.

Further, the local planning direction 4.3 will need to be considered in detail for any relevant sites, noting that provisions to increase intensity may require justification.

Climate change and resilience

In general, EES views that the consideration and application of the impact of climate change and associated sustainability factors set out in the draft master plan needs refinement and further development. EES recommends that the draft masterplan refer to the most recent NARClIM data and regional climate change snapshots and using these resources in land use planning.

EES notes that the impacts of climate change on environmental and heritage values has not been considered. Additionally, the impacts of climate change to built infrastructure are not adequately considered.

EES recommends improvements for adaptation and resilience are needed, including:

- a framework for a more systematic response to climate change - understand impacts, conduct risk assessments, and implement adaptation actions

- planning for sea level rise impacts by imposing minimum habitable ground floor levels and public open space standards to mitigate coastal inundation
- planning for urban heat impacts by imposing minimum thermal safety performance standards for buildings and minimum shade and amenity requirements for public open space standards to mitigate health impacts from heatwaves

The EIE is not consistent with climate change adaptation objectives of the Eastern City District Plan. <https://www.greater.sydney/eastern-city-district-plan/sustainability/resilient-city/adapting-impacts-of-urban-and-natural>

- establishing consistency with *Eastern City District Plan* - Planning Priority E20 Adapting to the impacts of urban and natural hazards and climate change, in particular:
 - Objective 36 People and places adapt to climate change and future shocks and stresses
 - Objective 37 Exposure to natural and urban hazards is reduced
 - Objective 38 Heatwaves and extreme heat are managed
- establishing consistency with the Strategic planning for natural hazards in NSW Natural Hazards package and supporting documents.

EES notes that The Pyrmont Peninsula is proposed to be a Low Carbon High Performance Precinct, with emissions reduction towards net zero emissions a key priority for this place. It is unclear what 'Low Carbon High performance' means and what is expected of developers.

EES recommends that a net zero emissions objective use stronger language and be more up to date. It may be also be worthwhile creating more definition in the City of Sydney's proposed planning controls. It is also assumed that each sub-precinct may require its own strategy to achieve low emissions and this may require more refinement.

The Pyrmont Design Guideline

Overall EES recommends including objectives that ensure development account for climate change impacts. This should include:

- including objectives that ensure development account for sea level rise impacts by imposing minimum habitable ground floor levels and public open space standards to mitigate coastal inundation
- including objectives that ensure development account for urban heat impacts by imposing minimum thermal safety performance standards for buildings and minimum shade and amenity requirements for public open space standards to mitigate health impacts from heatwaves
- addressing urban heat through building design at precinct scale that considers climate change and future climatic conditions to ensure that buildings and public spaces are designed to protect occupants in the event of heatwaves and extreme heat events
- referring directly to urban heat risks and increasing heatwaves to be treated through green infrastructure and explanation of how green infrastructure and water sensitive urban design (WSUD) can mitigate the impacts.

EES suggests reviewing recent reporting from Resilience NSW on the need for planning reform in NSW: "*Develop precinct based or commercial centre approaches to integration including design, land use activity, response capability, heat island effect and provision of cool places across all agencies*" - Heatwave and building codes in New South Wales: issues and prospects

EES recommends the consideration of additional 'public benefits' under a climate change scenario. These public benefits should include:

- the benefits of green infrastructure for urban heat
- energy efficiency benefits for resilience of buildings and thermal safety.

EES also recommends that all buildings be 'EV-ready' - i.e. have the electrical infrastructure in place to accommodate 100% EV charging at all parking bays. A requirement for accommodation of EV vehicles would help support transition and the Net Zero Roadmap.

EES supports the importance placed on sustainability as part of the key considerations for the draft masterplan. EES also supports the inclusion of other benchmarks / planning controls included that will enhance sustainability including application of principles of biophilia, and a Waste and Recycling management plan.

However, EES recommends that that some of these considerations could be expanded. EES recognises that some of these aspects *may exceed City of Sydney standards but are planned to be incorporated into the proposed [Design and Place SEPP](#) (currently on public exhibition) which is planned to come into effect from end of 2022.*

EES recommends that reference to Green Star buildings rating should also specify a 'credit achievement' be attained for the energy credit.

New non-residential buildings must target to achieve net zero emissions in operation. If this cannot be achieved, developments must procure renewable energy certificates to offset their residual operational emissions for a minimum 5-year period.

EES considers that these sustainability goals and targets could be further supported by requiring the development and implementation of:

- an Integrated Water Management Plan outlining the approach to water sensitive urban design and minimising use of potable water / maximising reuse on site and enhancing permeability
- an Electric Vehicle precinct charging plan (applying to public domain charging facilities including fast chargers).

Pymont Urban Design Report

There is no evidence of these plans being based on any established climate change scenario. EES recommends that a climate change assessment is prepared to establish risks of climate change to existing and future built environment and occupants.

End of Submission