

From: [Planning Portal - Department of Planning and Environment](#)
To: [DPE PS ePlanning Exhibitions Mailbox](#)
Cc: [DPE Rezoning Pathways Mailbox](#)
Subject: Webform submission from: Sydney Fish Market site in Blackwattle Bay Precinct
Date: Friday, 13 December 2024 2:07:27 PM
Attachments: [glebe-island-bridge-rebuild-proposal_dec2024_high-street-active-corridor-possible-light-rail-extension-to-bays-west.pdf](#)

Submitted on Fri, 13/12/2024 - 14:06

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Nathan

Last name

English

I would like my name and personal contact details to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Balmain 2041

Please provide your view on the project

I am just providing comments

Submission file

[glebe-island-bridge-rebuild-proposal_dec2024_high-street-active-corridor-possible-light-rail-extension-to-bays-west.pdf](#) (683.05 KB)

Submission

Dear DPIE and Infrastructure NSW (the proponents),

Thank you for allowing me to make this submission, I have to two things I wish to comment on...

First, I would like to encourage that the Blackwattle Bay Precinct's perimeter to be extended to include the Glebe Island Bridge - on the proviso this leads to its turning

mechanism being restored to full working order, as an important heritage item. The two embankments either side could be removed and redeveloped as a shop-top high street on stilts, to improve the flow of water in and out of both Blackwattle Bay and Rozelle Bay. This will improve the long-term water quality of the two bays and promote greater pedestrian interest in the Glebe Island Bridge itself.

The design and reconstruction of the two Glebe Island Bridge abutments (east and west of the swing mechanism) could allow for a basement level (ie. deliveries and parking) and three levels above (on either side of the old road corridor) between Monument Lookout on Glebe Island and Bank Street in Pyrmont. The road corridor itself would be reserved for active transport only - and at most, an electric bus corridor or two light rail tracks (if one day, public transport requires them).

The beauty of this adaptation concept for such an important heritage item, is that the new proposed shop fronts (built at street level) and the two levels of real estate above them, could help fund the refurbishment of the heritage-listed swing mechanism. The existing abutments are of little value by comparison, so demolishing them and replacing them with a newly built, multi-functional structure that also provides a new walkable high street in the middle of the Bays Precinct to connect east and west, will produce a wonderful piece of extended placemaking and finally achieve the re-opening of a much missed at-grade crossing of The Bays for pedestrians and cyclists travelling from Balmain to the City and vice versa. This will only add to the appeal of the new Blackwattle Bay precinct too. I encourage Infrastructure NSW to consider the merits of this proposal and advocate to the NSW Government that the site of the old Glebe Island Bridge be taken off Transport for NSW (who have done nothing with it since its closure in the way of actual Transport provision), so it can be incorporated and redeveloped as part of the Blackwattle Bay precinct - sooner rather than later.

Please reference also, the attached concept document for what I'm proposing. If it can't be seen (for any reason), please email me. This concept plan is an 'indicative only' suggestion for how a redeveloped Glebe Island Bridge might work. Humbly, while I do have qualifications as a city planner, I am no architect - so I offer the concept document only because pictures tell a thousand words. I know very well that a quality architect can come up with a much smarter design - perhaps based on the concept I'm trying to promote, this is my intention...

A second concept I would promote, is to seriously deter private motor vehicles from passing through the middle of your future Blackwattle Bay Redevelopment site, other than public transport (ie. electric buses), taxis and delivery or emergency vehicles. Private vehicles should not be encouraged at all - and parking should be widely discouraged.

Instead, given the quality sandstone bedrock that surrounds the subject area (which can be harvested and sold, btw), I believe a major win for the Blackwattle Bay precinct, its employees, residents and indeed those living in Pyrmont would be if the proponents were to ask permission from the NSW Government to create far more direct subterranean passageways from the middle of the new precinct itself straight under Bank Street (where at surface it is its most noisy and ugly for pedestrians). This would allow people to access the existing Fishmarket light rail platforms at grade. I would then also encourage another short tunnel from the same light rail platforms eastward into the future Pyrmont Metro platforms. These two very short pedestrian tunnels, carved out of sandstone (remembering the Bank Street one could be very easily done as a cut and cover job) would guarantee very high pedestrian movements back and forth between all three areas - even during times of inclement weather.

The fact is, the roads adjacent to the subject area will remain a nightmare for all time, given the fly-ons to the Anzac Bridge nearby, the Fishmarket itself and the Pyrmont-Ultimo employment hub. However, pedestrian tunnels all linking at grade, which are nicely lit, air-conditioned and spacious will promote a far greater sense of public safety and encourage the use of public transport in and out of Blackwattle Bay, should you bypass Bank Street and Bridge Road as the otherwise expected at surface corridors for pedestrians.

I thank the proponents of this Blackwattle Bay Precinct for their consideration of my two suggestions. Please don't hesitate to contact me with any questions via email - I do wish you every success and hope my submission has helped.

Regards,

Nathan English, MPlan

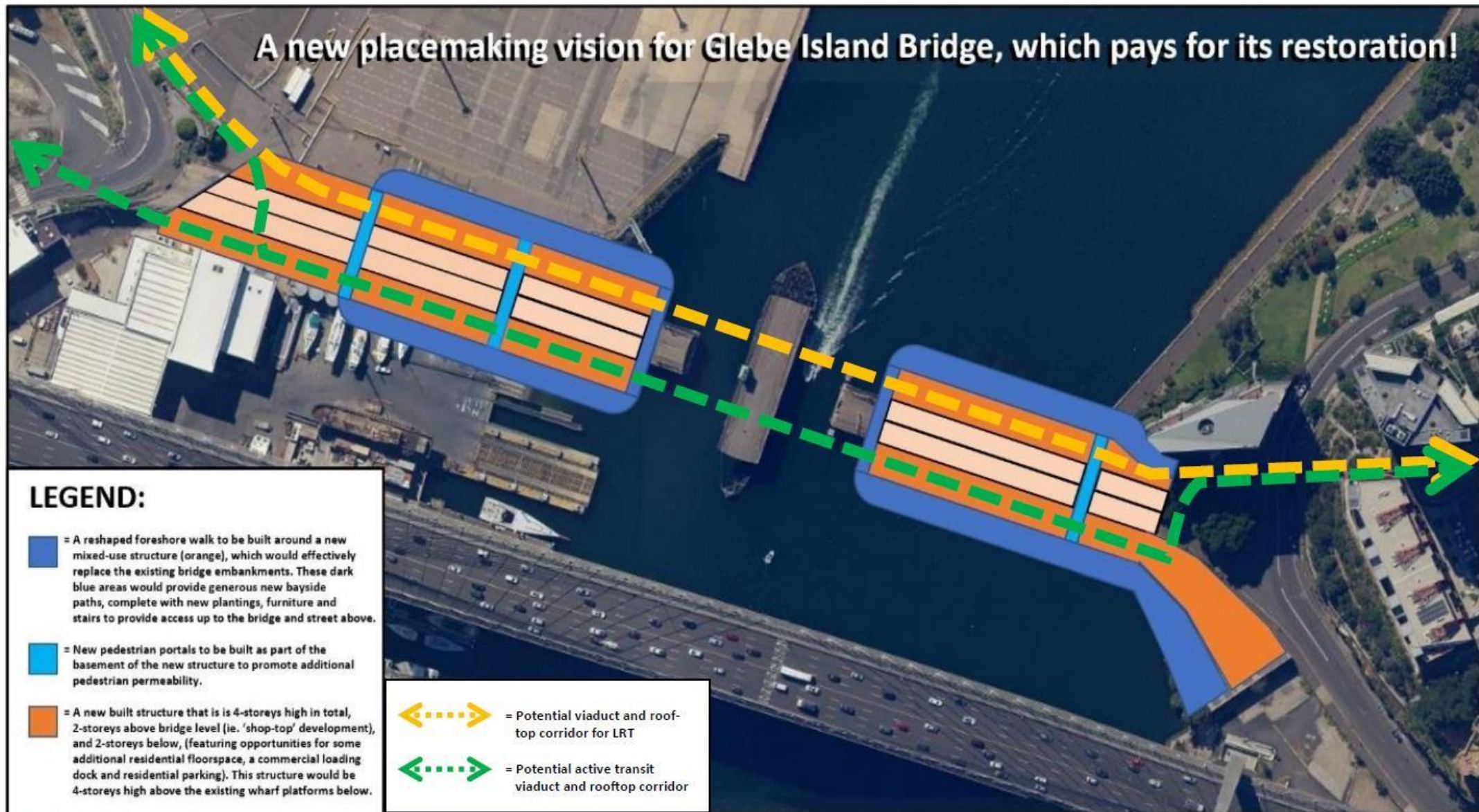
Resident of Balmain
Father of two and cyclist.

[REDACTED]

I agree to the above statement

Yes

A new placemaking vision for Glebe Island Bridge, which pays for its restoration!



ABOVE: Graphic shows how we might save the decaying Glebe Island Bridge by re-developing and adapting its tired, old embankments into a new Victorian-styled 'high street' that reconnects Pyrmont with Bays West. This would serve as a placemaking exercise that can also pay for the complete heritage restoration of the bridge itself, including its important mechanical function.

A cross-section of proposed reconstructed Glebe Island Bridge embankments, creating new mid-Bays 'high street' – Version 1

N
(north)

Overall width of the proposed re-built structure which would approach the existing swivel bridge = Approximately 38m

16.5m-wide carriageway approaching the 17m-wide swivel bridge

Grassed transit corridor

Cycleway

Two storeys of residential above shopfronts, overlooking The Bays

Potential outdoor dining area looking over The Bays

Street-level shopfront or restaurant

Two storeys of residential above shopfronts, overlooking The Bays

Potential outdoor dining area looking over The Bays

Street-level shopfront or restaurant

Existing wharf level and potential boardwalk around structure

LG level and basement store for street-level shops

Subterranean void for built below street level to provide residential car parking and delivery of goods. This would be designed to service street-front shops and the residents above, with entry points from the surrounding wharves nearby at grade.

LG level and basement store for street-level shops

Existing wharf level and potential boardwalk around structure

New base stilts allowing greater tidal flows beneath the rebuilt GIB abutments

New base stilts allowing greater tidal flows beneath the rebuilt GIB abutments

From: [Planning Portal - Department of Planning and Environment](#)
To: [DPE PS ePlanning Exhibitions Mailbox](#)
Cc: [DPE Rezoning Pathways Mailbox](#)
Subject: Webform submission from: Sydney Fish Market site in Blackwattle Bay Precinct
Date: Saturday, 14 December 2024 6:08:51 AM

Submitted on Sat, 14/12/2024 - 06:08

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Troy

Last name

Thornton

I would like my name and personal contact details to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Glenmore Park / 2745

Please provide your view on the project

I am just providing comments

Submission

This rezoning proposal speaks nothing of the original intent of the Blackwattle Bay precinct and a desire to incorporate more housing in NSW but speaks everything of corruption between governments, politicians and developers.

There is no need for the inclusion of homes on the site of Blackwattle Bay beyond the greed of developers. I'm afraid the pendulum has now swung and the forces that be swinging the pendulum are already in motion. The amenity of the community at large will now lose out as a result of this proposal.

I agree to the above statement

Yes



Dear State Rezoning and State Significant Development Approving Authority,

Thank you for an opportunity to comment.

As a long time City of Sydney's ratespayer, voter and local resident for many years, in the context of the existing 'Sydney Fish Market site (known as Area 17) in the Blackwattle Bay Precinct', I strongly support it's proposed development to deliver more than 300 new homes and contribute to local housing supply in close proximity to infrastructure, public transport, open spaces and jobs, and strategically aligns with local, state and federal initiatives to grow local centres and deliver more housing for the community.

I understand the proposed development would reasonably conduct professional traffic modeling (e.g. SIDRA, et al.) and traffic studies and upgrade relevant road intersections for smoother traffic flow, catering for the proposed population growth.

I also understand the proposed development would reasonably upgrade lightings, road safety, urban streetscapes, technology and, cater for more cafe outlets, contributing to quality and lifestyle improvements within City of Sydney LGA.

From: [Planning Portal - Department of Planning and Environment](#)
To: [DPE PS ePlanning Exhibitions Mailbox](#)
Cc: [DPE Rezoning Pathways Mailbox](#)
Subject: Webform submission from: Sydney Fish Market site in Blackwattle Bay Precinct
Date: Friday, 20 December 2024 11:06:11 AM

Submitted on Fri, 20/12/2024 - 11:05

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my name and personal contact details to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

2009

Please provide your view on the project

I object to it

Submission

Hi,

[REDACTED].

I strongly object to rezoning proposal which will increase the number of apartments to be built on the old fish market site. The reason for my objection is due to:

- Overcrowding - Pyrmont is already one of the most densely populated area in Sydney. This destroys the quality of life when there will be so many people cramped into a small area.
- Blocking of sunlight as the tall skyscrapers will block sunlight to surrounding building. This will result in a damp gloomy apartment and potentially mold. The lack of sunlight also contributes to poor human health and depression.

- Traffic jam as there will be a lot of cars with only one or two roads out of the area.

I urge the government to consider the current residents wellbeing and reject this proposal to increase the number of apartments. Please also limit building height as development should be moderate and reasonable so everyone can live a comfortable family life in this area without overcrowding, lack of sunlight and daily traffic congestion.

I agree to the above statement

Yes

[REDACTED]

I attempted to upload the attached file on the online submissions portal in respect of the rezoning proposal: Area 17 Blackwattle Bay. I received a message "Upload proceeding" after quite a long time, which does not make sense as the file is relatively small.

Hopefully sending this file through this email will qualify as a submission. Please confirm that it has been received and will be considered.

[REDACTED]



[REDACTED]

Rezoning Proposal: Area 17 Blackwattle Bay
Ref No SVPA 2024- 33

Currently Area 17 of Blackwattle Bay is to include 43% of the gross floor area for non-residential purposes. The rezoning proposal seeks to delete this requirement.

In brief, the underlying reasons for Infrastructure NSW seeking the rezoning proposal is that there is currently an **oversupply of non-residential premises and a housing shortage**; and these were not sufficiently taken into account when the 43% restriction was promulgated. These reasons are entirely valid and have wider implications.

The Department of Planning, Housing & Infrastructure should take the following actions

- 1. Instigate an urgent review of the Pyrmont Peninsular Place Strategy (PPPS)**
- 2. Instruct the City of Sydney Council to defer consideration of its planning proposals for Pyrmont/Ultimo**
- 3. Ensure that the granting of the rezoning of Area 17 is conditional on the zoning of 1-27 Murray Street, Pyrmont being Mixed Use in all circumstances.**

The above points are expanded on, below.

Oversupply of non-residential premises and housing shortage.

The material from Infrastructure NSW includes a considerable amount of evidence about oversupply of non-residential premises and housing shortage

“However, as a result of the COVID-19 pandemic and its implications on patterns of work, demand for employment floor space has declined consistently, with a noticeable increase in vacancy rates within existing stock.....Short, medium and longer-term employment growth is well catered for in existing stock within the current vacancy rates and in future supply within the CBD, Central Precinct.....” (19 June 2022 report by Ethos Urban “Blackwattle Bay State Significant Precinct Amendment to Area 17 Land Use Mix”)

“In conjunction with these changing employment trends, there is an increased pressure on the delivery of new housing in Sydney.....the NSW Government has identified housing supply as a key priority” (Ethos Urban report)

“The share of residential land uses in Area 17 is proposed to be increased from the approved rezoning in response to Government’s priority to increase housing supply and feedback from industry’s concern about the land use mix and the viability of commercial land uses in a post-COVID environment.” (20 March 2024 report by SGS “Blackwattle Bay Land Use Assessment”)

“The overall [commercial] vacancy rate increased to 11.52 per cent as of July 2023, which is the highest vacancy rate since 2005....” (SGS report)

“For the Eastern Harbour City, in which Blackwattle Bay is located, residential vacancy declined to a low of 1.8 per cent in 2023.....” (SGS report).

Urgent review of the PPPS

“It is noted that the [Pyrmont Place Peninsular] Strategy was finalised in 2020 before the extent and

nature of the impact of COVID-19 on employment, ways of working and demand for office floor space were understood.” (SGS report)

It should also be noted that the PPPS was finalised before recent huge migrant influxes which have had a significant effect on the housing shortage.

The proposed rezoning is an ad hoc adjustment to the PPPS being outdated. (Similarly there is a DA for the Fig St/Wattle St development to reduce non-residential floor space and increase residential.) It is far preferable to review the PPPS to bring it up to date for the realities of 2025, rather than having a number of individual adjustments. Zoning changes as an outcome of the PPPS review can then be done on a holistic basis rather than piecemeal.

Defer consideration of the Council’s planning proposals.

In accordance with the requirements of the NSW Government, the Council of the City of Sydney has put forward proposals for rezoning parts of Pyrmont and Ultimo. As stated in the SGS report about this process “During consultation, many comment were received regarding the viability of commercial floor space in a changed environment for business post-COVID with greater flexible working, and that there was too much focus on the supply of commercial floor space in light of the housing supply shortage.”

The Council planning proposals were devised (as instructed) to meet the PPPS targets. As these targets are out of date, the Council planning proposals must be deferred until a review of PPPS is carried out.

Retention of Mixed Use zoning for 1-27 Murray Street

As part of its planning proposals (to comply with the outdated PPPS) Sydney Council has proposed rezoning for 1-27 Murray Street Pyrmont. The current zoning is Mixed Use. Under the Council’s proposals, the height restrictions for 1-27 Murray Street are altered from 7 storeys to 21 storeys; provided that if the height of the building is increased, then the zoning for the entire building changes to non-residential. For the very same reasons that the amendment to Area 17 is put forward (over-supply of non-residential premises; housing shortage) 1-27 Murray Street should retain its zoning of Mixed Use. Moreover. 1-27 Murray Street has a higher claim to retaining Mixed Use, rather than being incentivised to become non-residential, as compared to the amendment of Area 17 to have its non-residential guaranteed proportion removed; the owners and residents at 1-27 Murray Street are overwhelmingly in favour of the retention of Mixed Use zoning , in the event of redevelopment, so as to receive adequate compensation for the loss of their homes and so that there is some possibility of returning to the site where they currently live. There are no owners/residents in Area 17 where lives will be disrupted by zoning changes.



From: [Planning Portal - Department of Planning and Environment](#)
To: [DPE PS ePlanning Exhibitions Mailbox](#)
Cc: [DPE Rezoning Pathways Mailbox](#)
Subject: Webform submission from: Sydney Fish Market site in Blackwattle Bay Precinct
Date: Wednesday, 29 January 2025 10:21:09 AM

Submitted on Wed, 29/01/2025 - 10:20

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

David

Last name

Zaoui

I would like my name and personal contact details to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Pymont

Please provide your view on the project

I object to it

Submission

I oppose the additional 320 dwelling rezoning which will further wall the Blackwattle Bay from Pymont and to instead increase the green public areas in the precinct, reduce the heights of Blackwattle Bay area of buildings and allow for a secondary school and traffic on Bank Street for extra housing.

I agree to the above statement

Yes

From: [Planning Portal - Department of Planning and Environment](#)
To: [DPE PS ePlanning Exhibitions Mailbox](#)
Cc: [DPE Rezoning Pathways Mailbox](#)
Subject: Webform submission from: Sydney Fish Market site in Blackwattle Bay Precinct
Date: Wednesday, 29 January 2025 2:34:52 PM

Submitted on Wed, 29/01/2025 - 14:34

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Organisation name

Hands off Glebe

Name

First name

Denis

Last name

Doherty

I would like my name and personal contact details to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

GLEBE

Please provide your view on the project

I object to it

Submission

Hands Off Glebe Inc.

[incorporating The Glebe Grapevine]

[REDACTED]

www.glebegrapevine.org

Department of Planning Housing & Infrastructure
rezoningpathways@dpi.nsw.gov.au

Response to
Blackwattle Bay State Significant Precinct
Amendment to Area 17 Land Use Mix
Introduction

Hands off Glebe is an advocate for public housing firstly, if we must we reluctantly live with some social housing believing this is privatization which we know never works, we also recognize that there is need for essential worker housing.

Objection

1. Housing

We have already had some hand in composing the following letter to Premier Minns in a widely distributed letter to Glebe, Ultimo, and Pyrmont:

OPEN LETTER TO THE PREMIER OF NSW

a)

Dear Premier,

The site of the old Fish Market in Pyrmont is about to be sold to developers without any provision for public and essential worker housing or necessary amenities.

We, the people of NSW, urge the NSW Government to include public and essential worker housing, along with schools and other necessary amenities, in the Blackwattle Bay development. This large publicly owned site is a unique opportunity to address Sydney's housing crisis, support essential workers, and prioritize community needs over private interests.

b) There is only one mention of public housing in the above document and then it is an oblique reference to a document prepared by the City of Sydney but there no indication that the Government will set aside some space for public housing. There is room for the Government to put aside space for public housing there is even a public policy document where the present Government has promised that 30% of Government land will be set aside for public housing.

c) The document states that public, social, build to rent and affordable housing is to be EXCLUDED from this development.

2. Height of buildings

Some of the buildings are still to be 141 metres which is over 40 storeys high. This height is unacceptable for residential towers.

3. Environmental

There does not appear to be green energy production through windmills or solar.

The waste generated from this site does not have modern provisions for disposal and using the material to enhance nutrition of soil in parks and gardens.

4. Sport facilities

The frequent use of Wentworth park for sports facilities as a source for local developments to fulfill open space requirements of construction means the space per person to exercise is very limited in the City of Sydney LGA. There are no plans to redevelop Wentworth Park to extend it over the dog track and make it a bigger recreation area.

There is mention of courts which I do not know as courts for what? Basketball, netball, or tennis or handball.

5. Infrastructure schools and hospitals

Primary Schools presently are full in Forest Lodge, Glebe, and Pyrmont while the small Catholic Primary School is insufficient to withstand a big influx of new students. High Schools are at breaking point too. Infrastructure in Education is not sufficiently covered.

Hospitals, mainly RPAH are overrun at the moment with ramping, 10-12 hour waits in Emergency. There is insufficient thought gone into the health infrastructure in evidence.

I agree to the above statement

Yes



FRIENDS OF ULTIMO
[REDACTED]

To
Department of Planning, Housing & Infrastructure
<https://pp.planningportal.nsw.gov.au/ppr/under-exhibition/sydney-fish-market-site-blackwattle-bay-precinct>

30 January, 2024

SUBMISSION
Sydney Fish Market site in Blackwattle Bay Precinct
Rezoning of Area 17

Friends of Ultimo (FoU) is a community action group, founded 13 years ago, which aims to address local Ultimo issues. We communicate with our 300 members through regular emails. Our Facebook page <https://www.facebook.com/ultimofriends> has around 200 followers and that number is growing steadily

INSW's Rezoning Proposal would remove a clause in the Sydney LEP 2012 that requires a minimum amount of non-residential floor area to be included in future development of Area 17 in the Blackwattle Bay Precinct. <https://pp.planningportal.nsw.gov.au/ppr/under-exhibition/sydney-fish-market-site-blackwattle-bay-precinct>

We welcome the Rezoning Proposal which aims at providing more dwelling and less office space in Area 17 (Old Fish Market and carpark site) although we still strongly believe the Blackwattle bay Precinct Project is a "massive, Barangaroo style, over-development" as stated in our submission of 18 August 2021.

Despite some minor improvements introduced by INSW in July 2022 in their "Response to Submissions" and the welcome current proposed rezoning of Area 17 we still **OBJECT** the project for the following reasons –

- The buildings are still too dense and too high (up to 37m) and would overshadow the foreshore promenade and block the views of the Bay from existing Pyrmont/Jackson Landing residential buildings.

This is inconsistent with the following PPPS provisions:

- *Direction 2 (page 25): that "Development (should) complement or enhance that area."*
- *Blackwattle Bay sub-precinct priority 6 (page 67): to "Establish controls to ensure development protects sunlight to existing and future open space"*

- The buildings are clustered along the Western Distributor exposing future residents to traffic noise and fumes.

This is inconsistent with PPPS Direction 9 (page 33): "Great homes that can suit the needs of more people."

- Public space remains inadequate for the anticipated population and badly located. Specifically the Bank Street Park is located under the Anzac Bridge.

This is inconsistent with PPPS:

- *Direction 5 (page 29) "A tapestry of greener public spaces and experiences"*
- *Big Move 5 (page 40): "More, better and activated public space"*

- There are no plans for –
 - Education, transport, health or community facilities, to support existing and new residents.
 - Public and Affordable Housing -- or accommodation for first responders, e.g. police or health workers - rather a proposed high developer levy on residential developments which is likely to inhibit provision of such housing!


Our area needs little more commercial development as a large percentage of that existing is currently vacant.

We are not opposed to development which improves the social and physical amenity of the Peninsula, but object to this plan based on outdated targets that will do little or nothing to increase Public and Affordable Housing for those currently struggling.

All it will achieve are more empty investment properties for the wealthy, a large part of them ending up as short-term rentals and empty office and retail space.

Our Pymont Action/Friends of Ultimo joint petition <https://www.change.org/p/pause-the-nsw-government-s-densification-plans-for-pymont-and-ultimo> asking the NSW Government to "Pause its densification plans for Pymont and Ultimo" is reaching 850 signatures and growing.

Yours sincerely,

Two handwritten signatures in blue ink. The first signature is 'PaJ' and the second is 'Jean-Pierre Alexandre'.

Patricia JOHNSON & Jean-Pierre ALEXANDRE
Co-Convenors

Friends of Ultimo
 FriendsofUltimo@ultimofriends

From: [Planning Portal - Department of Planning and Environment](#)
To: [DPE PS ePlanning Exhibitions Mailbox](#)
Cc: [DPE Rezoning Pathways Mailbox](#)
Subject: Webform submission from: Sydney Fish Market site in Blackwattle Bay Precinct
Date: Wednesday, 29 January 2025 10:31:27 PM

Submitted on Wed, 29/01/2025 - 22:31

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Angus

Last name

Fraser

I would like my name and personal contact details to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Pymont 2009

Please provide your view on the project

I object to it

Submission

I object to the proposed amendment to exempt Area 17 from the requirement to have non-residential floor area.

Reasons include:

- 1) The area has a number of residents (current & proposed) who would benefit from further commercial or community space such as a community plaza or shops.
- 2) Where Area 17 is located, between the nearest light rail stop and several different locations (fish markets, Pirrama Park, and the proposed new parks) it will detract from use and linkage of those spaces.
- 3) The submission refers to the nearby CBD for work and shopping options, however nearby opportunities should not disallow from development in this space.
- 4) If this space can serve as a physical link between nearby spaces, it will add to a longer line of access from the light rail through to Blackwattle Bay School and the park

connected, linking the community. Turning this space over to residential purposes will work against this, and

5) Further and nearby competition for commercial or public spaces near the fish market will complement the area, making the precinct more attractive as a whole.

I do support further residencies being built. Any extra height or width allowed to the development would be welcomed, provided it was safe and the space at ground or similar level remained for non-residential use.

Regards,
Angus Fraser

I agree to the above statement

Yes

From: [Planning Portal - Department of Planning and Environment](#)
To: [DPE PS ePlanning Exhibitions Mailbox](#)
Cc: [DPE Rezoning Pathways Mailbox](#)
Subject: Webform submission from: Sydney Fish Market site in Blackwattle Bay Precinct
Date: Thursday, 30 January 2025 9:57:00 AM

Submitted on Thu, 30/01/2025 - 09:56

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Robert

Last name

Gavagna

I would like my name and personal contact details to remain confidential

No

Info

Email

[REDACTED]

Suburb/Town & Postcode

Pymont 2009

Please provide your view on the project

I object to it

Submission

My objection is not to the project itself. Rather, it is to the additional proposal very recently lodged by Planning NSW.

Whereas the original proposal was for 1500 residents and in taller towers, this was amended to 1200 residents in lower towers. This amendment was achieved as a result of the evidence based submission by City of Sydney.

The tower height lowering would contribute to more access to sunlight for residents, Sydney Fish Market (SFM) visitors, workers and plant life.

It would also provide contra views between those attending the SFM and those residing or working on The Pymont peninsula.

This reversion to 1500 residents cancels those benefits for a far greater number of people than 300 residents!

A far more important problem for you to solve is the key issue of parking. The new parking facilities are simply & totally inadequate,

I agree to the above statement

Yes

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Subject: Rezoning Proposal: Area Blackwattle Bay. [Ref.no:](#) SVPA 2024-33

Department of Planning, Housing and Infrastructure
Rezoning Proposal: Area of Blackwattle Bay
Ref: no SVPA 2024-33
To whom it may concern

I have deep concern with the current proposals that are being put forward to change the present landscape around the area.
High rise buildings totally destroy the pleasant ambience of 'village/suburban' atmospheres. Bringing in increasing traffic, noise, dust and fumes etc. + the massive disruptions created by traffic and building noise during their construction.
Tall buildings block views and cast formidable shadowing over existing residences. There is never enough parking provided within the complex for residents and their visitors and around that particular area, parking is already minimal/almost non existent.

Our current public transport does not operate in a reliable form, that the public can depend on, making it extra difficult/impossible to manoeuvre them (the public) to and from their workplaces, schools, appointments and shopping etc.

It is all very well for the 'powers that be' to sit at a desk and rezone an area and draw/add in a few tall buildings.
There must be an enormous amount of thought, research, talk to current residents and planning before anything like this could even begin AND I don't feel this has occurred at all, otherwise you would not even consider this latest plan.

Sincerely

[REDACTED]

12 February 2025

Our Ref: X082589
File No: 2025/043060

[REDACTED]
[REDACTED]
Planning, Land Use Strategy and Infrastructure

By email: rezoningpathways@dpie.nsw.gov.au
planningagreements@planning.nsw.gov.au

[REDACTED]
Blackwattle Bay, land use amendment and voluntary planning agreement

Thank you for the opportunity to comment on the amended Blackwattle Bay State significant rezoning and voluntary planning agreement. We note that the proposal by Infrastructure NSW (INSW) seeks to amend the recently made planning controls for NSW Government owned land at Blackwattle Bay to remove a 43% non-residential floor space minimum requirement.

The City supports the NSW Government's commitment to deliver additional housing stock on its surplus land as outlined below. This support however is conditional on implementing the following recommendations:

Recommendation 1: Sydney LEP 2012 and the Blackwattle Bay Design Guidelines (the Design Guidelines) be amended to require a future Concept Development Application to be submitted and publicly exhibited to resolve a number of existing outstanding issues related to residential and public amenity and issues created by the proposed amendment, including:

- apartment building envelopes and layouts that do not protect future residents from the harmful effects of noise from the western distributor and concrete batching plant while providing adequate natural ventilation to habitable rooms
- insufficient natural cross ventilation in the first eight levels of residential buildings due to their large floor plates
- unsafe and uncomfortable wind on footpaths and in public open spaces
- unsafe intersections at Pyrmont Bridge Road and Banks Street for all users
- overshadowing of the foreshore reserve, and
- overshadowing of neighbouring residential properties.

Design Guidelines objectives and criteria are to be prepared in collaboration with the City, DPHI and the NSW Government Architect.

Recommendation 2: The affordable housing contribution be increased from 7.5% of all floor space to a minimum of 12.9% of all floor space and the NSW Government to commit to the affordable housing being delivered on site.

Recommendation 3: The Pyrmont Bridge Road Cycleway Extension and the Bank and Miller Street Intersection Works be brought forward in the delivery program to service the new community.

Recommendation 4: The NSW Government recommit to the return of Wentworth Park as public open space and to not extend the Greyhound Breeders, Owners and Trainers Association's lease beyond 2027.

Recommendation 5: The Design Guidelines are to retain references to compliance with the City's Sydney Streets Design Code, public space plans and the requirement for a Flood Risk and Impact Assessment.

Recommendation 6: School Infrastructure NSW be required to prepare and publish publicly a public-school demand, supply access and opportunity study to 2041 for the Ultimo, Pyrmont, Glebe and Bays West areas.

Recommendation 7: The NSW Government is to continue improving bus, light rail and ferry services, and create an integrated network that can leverage off Pyrmont Metro in 2032.

Land use mix

For Blackwattle Bay to function as a stand-alone office precinct, INSW's own economic, and employment advice was that a critical mass of office floor space was required. This critical mass was not achieved in the planning controls finalised by Department of Planning, Housing and Infrastructure in December 2022.

A shift to provide more housing at Blackwattle Bay aligns with the City's Ultimo Pyrmont Planning Proposal that seeks to:

- incentivise a critical mass of business floor space close to Pyrmont Metro Station to promote public transport use by workers and customers, support a self-sustaining workplace precinct in a diversity of building typologies while also continuing to support the growth and clustering of creative media businesses
- plan for a middle ring of mixed-use developments with strong public transport accessibility to provide homes for people and good access to local shops and services for existing and future residents, and
- provide an outer ring of residential development, comprised of housing options ranging from higher density to small lot dwellings, located slightly further from public transport but still within walking distance of light rail, bus routes or the Pyrmont metro station.

The City therefore supports INSW's proposal to deliver additional housing on the government owned site, however, additional amendments are required to the planning framework to protect the health and amenity of future residents, that overshadowing to neighbouring residential properties is minimised and that the proposed growing population is supported by appropriate infrastructure provision, in particular open space provision.

Gross floor area

Residential gross floor area requires a greater building volume than commercial gross floor area. This is because unmeasured areas like terraces, services and circulation are greater in residential buildings than commercial buildings.

Removing the minimum proportion of commercial floor area, without adjusting the total permissible floor space, will result in an increase in the building massing and volume compared to the reference scheme. To avoid this, the total permissible floor space should be reduced to reflect the lesser efficiency of residential floor area.

Clause 6.67(2) of Sydney LEP 2012 currently exempts the development at Blackwattle Bay from the requirement to prepare a Development Control Plan (or Concept Development Application). This is reasonable where a detailed Development Control Plan (or Design Guide) is in place that provides well considered planning controls that address the constraints presented on site. In absence of a revised reference scheme, floor area and Design Guidelines, Sydney LEP 2012 and the Design Guidelines should be amended to require a future Concept Development Application to resolve a number of existing outstanding issues related to residential and public amenity (see below).

Residential and public amenity

The reference scheme that informed the approved Design Guidelines failed to meet the following residential and public amenity standards:

- apartment building envelopes and layouts do not protect future residents from the harmful effects of noise from the western distributor and concrete batching plant while providing adequate natural ventilation to habitable rooms
- insufficient natural cross ventilation in the first eight levels of residential buildings due to their large floor plates
- prevention of unsafe and uncomfortable wind on footpaths and in public open spaces
- safe intersections at Pyrmont Bridge Road and Banks Street for all users
- overshadowing of the foreshore reserve, and
- minimising overshadowing of neighbouring residential properties.

The additional bulk from a higher proportion of residential floor space, resulting from this proposed amendment, further exacerbates these issues.

[The City's alternative reference scheme](#) demonstrated that the previously recommended mix could be accommodated with better amenity than the previous INSW reference scheme, with more floor area.

The City is therefore confident that a scheme can be developed that provides more residential floor space and good amenity for future residents and the public, but that scheme would have a different street and open space layout and different building forms than that illustrated in the approved Design Guidelines.

If the amended rezoning proceeds without amending the Design Guidelines, the Design Guidelines will become a significant impediment to the project progressing at development application stage.

Sydney LEP 2012 and the Design Guidelines must be amended to require a future Concept Development Application to be submitted and publicly exhibited to resolve the outstanding issues. The development controls relating to specific street layouts and building forms should be replaced with a series of objectives and criteria (e.g. references to the NSW Apartment Design Guide, Sydney Streets Code etc) which the future Concept Development Application must demonstrate consistency.

The Design Guideline's objectives and criteria must be prepared in collaboration with the City, DPHI and the NSW Government Architect.

Affordable and diverse housing

The redevelopment of Blackwattle Bay is a key opportunity to deliver significant affordable housing outcomes in the City of Sydney local area.

The City welcomed the introduction of an affordable housing contribution requirement with the 2022 rezoning, however we remain concerned that the current 7.5% requirement is exceptionally low on a NSW Government owned site, given the housing crisis and the need for social and affordable housing. It falls far short of the expectation set out in the City's City Plan 2036: Local Strategic Planning Statement that 25% of floor space on NSW Government sites should be provided as affordable housing and/or social housing in perpetuity. This was the contribution requirement advocated in the City's submission to the Department about the proposed rezoning in 2022.

The current contribution requirement, that is understood to be generally based on what can be contributed by the development for affordable housing while maintaining development feasibility, should be increased. The increase is justified given the proposed amendment will enable additional residential development on the site.

Calculating the increase

A recent study undertaken in support of a proposal to amend the City of Sydney Affordable Housing Program, found that on privately owned sites, a 20% affordable housing contribution requirement on new residential floor space would not impact on development viability. The research is available here: <https://city.sydney/ahc24>.

The proposed amendment seeks to remove the non-residential restriction on about 55,595 square metres of floor space. Given the findings of the City's study and noting a 7.5% contribution requirement applies to this floor space under the current controls, a further 12.5% of new residential floor space created by the proposed amendment (about 6,949 square metres) should be required.¹

Under current planning controls the contribution requirement of 7.5% of all floor space on the site is expected to deliver about 9,697 square metres of affordable housing. Should a further 6,949 square metres be required to be delivered (about 16,650 square metres in total), the current Sydney LEP 2012 contribution requirement, that applies to all floor space delivered on the site, will need to increase from 7.5% to 12.9%. This will deliver about 210 affordable dwellings at 80 square metres each.

The NSW Government should commit to the affordable housing being delivered onsite to a minimum and 12.9%, if not 25% of all floor space.

¹ Note the total contribution requirement on the "new" residential floor space will be 20%, including the existing contribution requirement of 7.5% of floor space, plus an additional 12.5% contribution requirement on *new residential* floor space. The 20% affordable housing contribution requirement is informed by the City's study that has demonstrated the contribution requirement is feasible.

Local infrastructure contributions

The Explanation of Intended Effect states that no changes are proposed to the infrastructure contribution arrangements that were established in the 2022 rezoning of the Precinct. This included a commitment for future development to pay local infrastructure contributions to the City of Sydney Council, to be put towards the provision of public amenities or public services.

Both the 2022 Finalisation report and the current Explanation of Intended Effect are ambiguous in relation to whether the costs of providing specific infrastructure on the Government owned land are to be offset against local contributions (the effect of which would be to reduce local contributions received by the City). It is the City's understanding that this is not the intention. It is understood that the intention is for contributions not to be payable on these infrastructure items themselves, with the cost of their delivery being borne by the developer but not being included in development costs for contribution purposes. Contributions would be payable on other development in the Precinct.

The City is satisfied that the draft Voluntary Planning Agreement (draft VPA) addresses this ambiguity in Schedule 5. Local infrastructure contributions are described as monetary contributions towards the provision of local infrastructure payable in relation to each "Relevant Development". The draft VPA defines "Relevant Development" as *"a part of the Development in the Development Area for which Development Consent is granted or a Complying Development Certificate is issued for residential or commercial purposes or uses, excluding any such Development Consent or Complying Development Certificate for any part of the Works Contribution"*. This definition ensures that local contributions will be payable for residential and commercial development on the site, but not for the infrastructure specified in the "Works Contribution" table in Schedule 6 of the draft VPA.

The City supports the draft VPA's arrangements for local infrastructure contributions to be payable at 3% of the development cost in the event that the City does not have a s7.12 contributions plan in force. The City notes that in these instances, a developer is to submit a Quantity Surveyor's cost estimate to the Minister, who is then to notify the developer in writing of the accepted cost estimate. Notification of the accepted cost estimate including the monetary amount of contribution payable, should also be provided to the City, so that the City can update its records and know the contributions amount it should expect to receive.

The City notes that work is still progressing on a s7.12 plan to facilitate local infrastructure contributions, with the [Draft Ultimo Pyrmont Local Infrastructure Contributions Plan 2023](#) having been on public exhibition in October - November 2024.

The draft VPA contains timing provisions for Works Contributions (Schedule 6 Item 1) and Land Contributions (Schedule 7 Item 1) linked to the issue an Occupation Certificate which is an appropriate trigger. However, the Occupation Certificate is described as one that will result in a threshold amount or percentage of the total GFA. The City notes that the use of this threshold formula may be cumbersome to administer and difficult to enforce where multiple buildings are under construction concurrently.

Essential active transport connections

It is noted that the VPA delays the delivery of essential works contributions within Schedule 6 - Development Contribution (Works Contribution), that enhance or complete essential active transport connections for the precinct. It is recommended to bring several key items forward to provide for the new community.

- Item 6 - Pyrmont Bridge Road Cycleway Extension Works Contribution. Reason: To provide safety and connectivity for cyclists from within the precinct and the wider region to access the City's cycle network
- Item 10 - Bank and Miller Street Intersection Works Contribution. Reason: To provide safety and connectivity for cyclists and pedestrians from within the precinct exiting Park Street, and the wider region to access the City's cycle network. The vehicular egress for the Hymix plant can be reconfigured during development to facilitate continuous access.

If not possible to bring the following forward for delivery with the first OC, the following items should have their design and consultation with the City of Sydney and other relevant stakeholders completed before the issue of the first Occupation Certificate for Development within the Development Area, to ensure consistency with other elements delivered within the precinct.

- Item 1 - Bank Street Cycleway Works Contribution. Reason: To ensure that traffic committee approval is provided for lane closures in Bank Street and any further conflicts arising from the precinct development are identified and addressed.

Open space infrastructure

Wentworth Park sits in the middle of one of the most densely populated neighbourhoods in Australia. It is already a highly utilised area of public open space:

- Monday to Thursday the City's sporting fields at Wentworth Park are fully booked between 3pm and 10pm, with additional unmet demand for an additional 4 fields
- Weekends are generally booked out between 8.00am-5.00pm
- the City's fields are used in excess of 40 hours per week, not including casual use, and
- in summer 4,000 OzTag players utilise the City's fields, including 1,500 women.

The City's Local Housing Strategy aims to provide an additional 56,000 dwellings between 2016 and 2036, with over 30,000 dwellings built or in the pipeline, including in areas around Wentworth Park such as Blackwattle Bay.

The City welcomed the former Government's commitment to return Wentworth Park under the Pyrmont Peninsula Place Strategy. It is critical that this parkland is returned to support the additional residential and commercial uses planned in the area.

The City has already conducted early consultation and begun a new masterplan for parkland use of this prime inner-city land, and we have included an allowance for embellishment works for the parkland in our Draft Ultimo Pyrmont Local Infrastructure Contributions Plan 2023.

As part of the City's consultation, we heard the community overwhelmingly supports removing the greyhound racing track to create more public parkland. The early

engagement also told us the community wants a well designed park to connect to nature, exercise and play, and one that supports social activity and a place that is easy to move through, which the greyhound track entirely prevents. This demand will only become stronger with population growth resulting from redevelopment of Blackwattle Bay, Bays West and Pyrmont.

The NSW Government must recommit to the return of Wentworth Park as public open space and to not extend the Greyhound Breeders, Owners and Trainers Association's lease beyond 2027. To not do so would potentially jeopardise the delivery of much needed housing in Ultimo, Pyrmont and the Bays.

Design Guidelines amendments

It is noted that on page 36 of the edited guidelines that the following sentence is removed: Street furniture is to be consistent with the Sydney Streets Design Code and relevant Council public space plans. If ownership or maintenance of the public areas and associated structure are to be ever to be taken over by the City, then these areas and structures must comply with the City's Codes and plans. This includes Smartpoles and park lighting. It is also important that new streets, linked to our surrounding network of streets do read consistently, and they should have the same furniture as the City for this reason.

On page 49 of the edited guidelines, we note Item 1 has been removed. We note also other retained text refers to the deleted Item 1. Item 1 is critical to be retained. This document refers to lands that are critical floodplain overland flow paths for upstream development. By deleting this text, the development is not adequately considering the impacts of flooding to upstream properties and the safety of the public surrounding the development. All developments are required to complete these studies in such situations, and it would not be appropriate for a NSW Government Agency to not follow its own NSW Flood Prone Land Policy.

School infrastructure

The City's Ultimo, Pyrmont and Glebe communities have consistently, over a number of years, highlighted their concerns around public school capacity and access in the area. These concerns have only intensified with the NSW Government's publication of place strategies for Bays West and Ultimo Pyrmont which outline significant population increases to 2041, but no provision or plan for augmented or additional public school infrastructure.

School Infrastructure NSW must be required to prepare and publish publicly a public-school demand, supply access and opportunity study to 2041 for the Ultimo, Pyrmont, Glebe and Bays West areas.

Public transport infrastructure

The City supports the Ultimo and Pyrmont communities' request for additional and augmented public transport services in the area. There is and will be growing demand for additional light rail, bus and ferry services, that run more frequently and stop more often, such as the F10 ferry stop at Pirrama Park. The City acknowledges that in the long-term, Pyrmont Metro will offer greatly improved connections with the city centre and other places on the Metro. However, there is still a need to provide additional and augmented services, including on the L1 light rail noting the operator's investigations into ways to achieve this. Additional services will support the NSW Government's redevelopments at Blackwattle Bay and the new fish markets, as well increase mobility for an existing community in an area where walkability is impacted by steep topography

and busy State roads. Connections to places such as Broadway Shopping Centre are important.

Should you wish to speak with a Council officer about the above, please contact [REDACTED]
[REDACTED]

Yours sincerely,

A handwritten signature in black ink, appearing to be 'GJahn', written in a cursive style.

Graham Jahn AM LFRAIA Hon FPIA
Chief Planner / Executive Director
City Planning | Development | Transport