



9 December 2025

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Anna Nowland  
Principal Planning Officer  
Department of Planning, Housing and Infrastructure

via Major Projects Planning Portal

Dear Anna,

**SSD-53386706 Mod 2 – Bank Street Park – Advice on Modification**

Thank you for your correspondence dated 25 November 2025 inviting the City of Sydney (the City) to comment on the above referenced State Significant Development application. The City has reviewed the application and **objects** to the changes in the proposed modification as outlined below.

**Not substantially the same development**

The proposed modifications descopes and changes significant elements of the originally approved park and should not be considered substantially the same development. The overall design quality and access to the expected level of amenities have been significantly changed, while temporary facilities are proposed to now be made permanent.

**Deletion of Community, Marina, Kiosk and Amenities Building**

The City objects to the deletion of the approved community and amenities building and relocation of these core functions to inferior locations and buildings.

The Blackwattle Bay Design Guidelines require the inclusion of a minimum of 400sqm of community GFA within the Precinct and is specifically identified to be located in Bank Street Park (1-3 Bank Street) or Building 1. There is no assurance that building 1 is able to accommodate well designed and well located community facilities, or the mechanism in which INSW are able to secure this delivery.

The approved community facilities within Bank Street account for 114sqm of the required community facilities floor space and is ideally located within a harbourside park location. The location of some of the community floor space within the park would also support a diverse offering of community facilities supporting the existing and incoming community.

The application infers that community uses can be accommodated at the recently upgraded Pyrmont Community Centre. The City strenuously objects to the reliance on council owned and funded facilities to support the State government's future development of Blackwattle Bay, particularly noting community facilities were an

identified need in the rezoning and the provision of which onsite is required by the accompanying guidelines.

The retention of the existing amenities building is a poor outcome for the park. The facilities were originally constructed as a temporary measure to accommodate the relocation of Dragon Boating activities to Bank Street and is poorer quality than the approved amenities would be.

Additionally, this also results in the removal of a significant areas of landscaping located outside the shadow of Anzac Bridge that would have supported significant canopy tree planting. The City has made a number of submissions in the past advocating for additional tree canopy on site, particularly acknowledging the impact caused by Anzac bridge overhead, and objects any further diminishment of the approved tree canopy.

The retention of this building also takes away from the sense of openness, creating sight lines and inviting people into the park from the Bank Street shared path. This has also been reflected in the submitted security review which identifies a greater likelihood for break and enters or malicious damage. Overall, the review identifies that the proposed changes have a negative impact on the usership of the park and opportunities for passive and natural surveillance in comparison the originally approved building uses and layout.

The retention of marina facilities within a public park has been a point on contention for the community. Whilst the City acknowledges the role these facilities have in providing public and commercial access to the harbour, the approved building better allowed for the retention of these facilities with the smallest impact on the park by providing a small and well-integrated office area.

Instead, the proposed modification seeks to retain the existing temporary construction marina facilities, albeit in a relocated area, and takes up more space and is poorly integrated into the layout and design of the park. The space around the building is disjointed from the park whereas the approved building is a focal point and allows people to move around and through the building and enjoy the surrounding park areas, paths and landscaping.

### **Deletion of the Foreshore Boardwalk**

The proposed deletion of the approved boardwalk between the eastern Anzac Bridge Pylon and the northern end of the park near Glebe Island Bridge is also objected to. The deletion of the boardwalk is inconsistent with the broader objectives for Sydney Harbour and development within foreshore areas which seeks to maximise public access to the foreshore.

The approved boardwalk would contribute a small by valuable section of the broader foreshore access walkway and contributes to the ongoing efforts to connect the CBD to Parramatta along the foreshore.

The approved boardwalk also allows for a future more direct connection to Glebe Island Bridge and around to the existing foreshore path north of the Bowman Street properties towards Pirrama Park to the north east. The Blackwattle Bay Sub-Precinct Structure Plan (refer to figure below) clearly indicates the proposed future connectivity directly along the foreshore.



**Extract of Figure 4.8.4 of the Pyrmont Peninsula Place Strategy**

The application infers that the approved alignment makes for an awkward terminus at the northern end adjoining Glebe Island Bridge and obfuscates any notion that this would be resolved through the refurbishment of the bridge. This is easily resolved in the interim through wayfinding signage and is an acceptable temporary outcome given the overwhelmingly positive contribution securing each additional section of boardwalk makes to the broader foreshore connectivity.

Should you wish to speak with a Council officer about the above, please contact Michael Stephens, Senior Planner, on 9265 9040 or at [mjstephens@cityofsydney.nsw.gov.au](mailto:mjstephens@cityofsydney.nsw.gov.au)

Yours sincerely,

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