

Sian Holmes
Department Planning, Housing and Environment
Major Projects Portal

State Environmental Planning Policy (Transport and Infrastructure) 2021
State Significant Development Application - SSD-96974214
60 Union St, Pyrmont

22 October 2025

Dear Sian Holmes,

Thank you for your referral dated 22/10/2025 to Sydney Metro requesting input into the Department of Planning, Housing and Infrastructure Secretary's Environmental Assessment Requirements (SEARs) for the proposal including details of any key issues and assessment requirements, in accordance with section 2.99 of the *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&ISEPP).

Transport for NSW (TfNSW) has delegated its rail authority functions in relation to the Sydney Metro West rail corridor to Sydney Metro. Therefore, Sydney Metro is the relevant rail authority for the Metro West rail corridor for the purpose of the T&ISEPP.

Concurrence of Sydney Metro is not required

Sydney Metro understands that the development the subject of the DA is State Significant Development (SSD) being construction of an addition above the existing building, resulting in a mixed-use building up to a height of approximately RL 118 – RL 130 (approximately 33 storeys including ground and roof level).

As this is a SSD application, the provisions of section 2.99 of the T&ISEPP do not apply.

Section 4.13(2A) of the *Environmental Planning and Assessment Act 1979* excludes concurrence or consultation requirements from applying to development applications for SSD, unless an environmental planning instrument requires concurrence or consultation to SSD. As section 2.99 of the T&ISEPP does not require concurrence to be provided in the context of a development application for SSD, concurrence is not required for the DA.

Notwithstanding this, in order to ensure the appropriate management and mitigation of the proposed

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development's impacts on the Sydney Metro - West rail corridor, Sydney Metro has reviewed the SSD documents that were uploaded onto the Major Projects Portal on 20/10/2025, including having regard to the matters outlined in the T&ISEPP.

Based on this review, Sydney Metro requests:

- Consideration of the State Environmental Planning Policy (Transport and Infrastructure) 2021
- A report demonstrating compliance with the Sydney Metro Underground Corridor Protection Technical Guidelines (<https://www.sydneymetro.info/media/document/48426>).

Sydney Metro thanks the Department of Planning, Housing and Infrastructure for its assistance.

Please contact Peter Bourke Senior Manager Corridor Protection or Lauren Saunders Corridor Protection Coordinator via email sydneymetrocorridorprotection@transport.nsw.gov.au should you have any further enquiries on this matter.

Sincerely,



Peter Gerard Bourke
Senior Manager
Corridor Protection
SSD-96974214 – 60 Union St, Pyrmont

13 November 2025



ATT: Sian Holmes
Planning Officer
Department of Planning and Environment

24-28 Campbell St
Sydney NSW 2000
All mail to
GPO Box 4009
Sydney NSW 2001
T +61 2 13 13 65
ausgrid.com.au

Dear Sian,

In reference to Union Street, Pyrmont Mixed Use and Rezoning (SSD-96974214).

Ausgrid would like to thank you for seeking input and feedback regarding the advice for SEAR's.

Ausgrid recommends the addition of the following to the SEARS under Utilities:

In consultation with relevant agencies prepare a services and utilities impact assessment which:

- assesses the capacity of existing services and utilities and identify any upgrades required to facilitate the development.
- assesses the impact of the proposal on existing utility infrastructure and service provider assets and describes how any potential impacts would be managed.

Please do not hesitate to contact me for further information.

Regards,

A handwritten signature in black ink, appearing to read "Jim Danks".

Jim Danks - Project Officer - Asset Protection
jdanks@ausgrid.com.au
0457 803 587

17 November 2025

TfNSW Reference: SYD25-01337/01

DPHI Reference: SSD-96974214



Ms Kiersten Fishburn
Secretary
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Attention: Sian Holmes

**SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS
PROPOSED MIXED USE DEVELOPMENT
60 UNION STREET, PYRMONT**

Dear Ms Fishburn,

Thank you for referring the request for Secretary's Environmental Assessment Requirements (**SEARs**) for the abovementioned State Significant Development Application (**SSDA**) to Transport for NSW (**TfNSW**) for review and comment.

TfNSW has reviewed the Scoping Report and provides assessment requirements and comments in **TAB A** for the consideration of the Department of Planning, Housing and Infrastructure (**DPHI**).

Should you have any further inquiries in relation to this matter, please contact Jim Tsirimiagos, Land Use Planner, via email at development.sydney@transport.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Aleks Tancevski".

Aleks Tancevski
Senior Manager Land Use Assessment Eastern
Transport Planning Branch
Planning, Integration and Passenger

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TAB A TfNSW Assessment Requirements and Comments

1. Transport Impact Assessment (TIA): A TIA shall be prepared in accordance with the *Guide to Transport Impact Assessment* (GTIA). GTIA replaces the Guide to Traffic Generating Developments and can be found at this [link](#). The TIA will enable TfNSW to understand the impacts the development may have on the state classified road network that it manages, as well as the impacts from local road connections with the state classified road network as a consequence of increased vehicular, bus and pedestrian/active transport movements. The TIA must include, but not be limited to, the following:
 - a) Details of all traffic types and volumes likely to be generated during construction and operation. Traffic flows are to be shown diagrammatically to a level of detail sufficient for easy interpretation.
 - b) An assessment of the predicted impacts of development traffic on road safety and the capacity of the road network, including consideration of cumulative impacts of nearby approved developments at key intersections, using SIDRA or similar traffic model.
 - c) Identification of any necessary road network infrastructure upgrades (e.g. signage, pedestrian facilities, intersection upgrades, etc.) that are required to mitigate the development impact on the classified road network, in terms of safety and efficiency for both vehicles and pedestrians. Any proposed intersection upgrades should consider the broader growth planned for the Pyrmont Precinct. Any required/proposed road network infrastructure upgrades/mitigation measures should be developed in consultation with TfNSW.
 - d) A review of the crash data along the identified transport route/s and key nearby intersections for the most recent 5-year reporting period and an assessment of the safety implications of the proposed development and required mitigation measures.
 - e) Plans demonstrating how all vehicles likely to be generated during construction and operation and awaiting loading, unloading, or servicing can be accommodated on the site to avoid queuing in the street network.
 - f) Details of the site access and pedestrian network and parking provision associated with the proposed development, in accordance with the relevant Australian Standards and Council's Development Control Plan (DCP).
 - g) Details of travel demand management measures to minimise the development impact on general traffic and bus operations, including details of a location-specific sustainable travel plan (Green Travel Plan and/or specific Workplace Travel Plan) and the provision of facilities to increase the non-car mode share for travel to and from the site.
 - h) Details of the adequacy of existing public transport or any future public transport infrastructure within the vicinity of the site, pedestrian and bicycle networks and associated infrastructure to meet the likely future demand for the proposed development.
 - i) Measures to integrate the development with the existing/future public transport network.
 - j) A preliminary Construction Transport Management Plan (CTMP) should be prepared as a part of the TIA showing how the proposal will mitigate cumulative construction impacts.
2. Sydney Light Rail: It is noted that the proposed works include construction of a mixed-use development adjacent to the Sydney Light Rail corridor and Pyrmont Bay Light Rail Station. It is advised that the Sydney Light Rail infrastructure and operation needs to be protected during the construction and operation of the proposed development.

It is requested that the following needs to be included as part of the SEARs:

- a) Consider any requirements of the Transport and Infrastructure SEPP in relation to the proposed development adjacent to the Sydney light rail infrastructure.
3. Sydney Metro: Sydney Metro requests that the SEARs also consider the following items given the site's interface with the Sydney Metro station precinct:
 - a) **Solar and visual impact analysis** - The scoping report notes that the Environmental Impact Statement (EIS) will include detailed overshadowing and solar access analysis to assess impacts to neighbouring properties, including shadows generated by the maximum planning envelopes proposed in the City of Sydney's planning proposal to understand cumulative impacts. It is requested that the SEARs include specific consideration of solar and visual impacts to the Sydney Metro site and approved concept.
 - b) **Public domain and interchange outcomes and ongoing consultation** - the scoping report notes that a Public Space Plan will be provided as part of the EIS. It is requested that the SEARs note consultation required with Sydney Metro to ensure alignment on public domain outcomes for Union Street and the wider interchange area, including responding to the Pyrmont Peninsula Design Guidelines, Sydney Metro's Station and Precinct Design Guidelines and City of Sydney's ongoing strategic planning work. Sydney Metro also requests the SEARs to note Sydney Metro/TfNSW as a relevant agency for consultation to enable early feedback given the site's interface with the Metro station precinct.
 - c) **Construction traffic management** - Construction for the proposal is anticipated to occur between 2028-2030, which will coincide with the construction program for the Pyrmont Metro Station CSSI works. We request that the SEARs require the proponent to prepare a CTMP in consultation/agreement with Sydney Metro and TfNSW prior to any construction activities commencing.

4. Planning Proposal: TfNSW notes that this SSDA is subject to a concurrent Planning Proposal to amend the planning controls applying to the site to enable the intended mixed-use outcome and associated uplift in height and floor space ratio. Details of the proposed LEP amendments to facilitate this development should be provided as part of the Planning Proposal documentation and early consultation with TfNSW is encouraged in the process.
5. Active street frontages: It is noted that active street frontages are required along Union Street within the Sydney Development Control Plan 2012. Further details should be provided within the Planning Proposal and SSDA.
6. Noise and Vibration: The future development may be sensitive to noise and vibration impacts. Accordingly, a Noise and Vibration Impact Assessment should be provided with the EIS.

12 November 2025

Our Ref: 2025/684276
File No: R/2025/20

Sian Holmes
Planning Officer
Department of Planning, Housing and Infrastructure

via Major Projects Planning Portal

Dear Sian

SSD- 60 Union Street, Pyrmont – Advice on Request for SEARs

Thank you for your correspondence dated 20 October 2025 inviting the City of Sydney (the City) to comment on the above referenced State Significant Development application.

The application seeks a State Significant Development application and concurrent rezoning for the Site at 60 Union Street, Pyrmont.

The City has reviewed the scoping report and attended a Planning Focus Meeting with the Department and the Proponent. The following advice is provided for your consideration in the preparation of the project specific SEARs.

Concurrent rezoning

1. Zoning

In its determination to refuse EOI 272580 as an SSD for 86-92 Harris Street, Pyrmont, the Housing Delivery Authority (HDA), specifically the DPHI Secretary noted that “This is part of the commercial zoning in the area and any transition from commercial to residential in this location needs broader strategic context and work”.

The City agrees with this conclusion.

The subject site, 60 Union Street has the same E2 Commercial Centre zoning. The conclusions of the HDA therefore should also apply in this instance.

Note: It is the City’s position that an individual landowner is incapable of procuring an independent and unbiased broader strategic review of the need to retain the E2 Commercial Centre zoning for this site, and E2 Commercial Centre zoned sites more broadly. This is the strategic role of the City of Sydney.

Notwithstanding, DPHI have limited the City’s ability to comment on the proposal to that of providing advice on the required SEARs. As such, in line with the Secretary’s conclusions on 86-92 Harris Street, the proponent must be required to procure the preparation of a Strategic Review of the Harbour CBD Strategic Centre Employment

Lands comprising the SP5 Metropolitan Centre and E2 Commercial Centre, in line with DPHI's [Employment Land Strategy Guideline](#).

Any review must be prepared in collaboration with the City of Sydney and DPHI's employment lands team, by an agreed suitably qualified consultant. Given the nature of who is procuring the work, as developer, DPHI must also commit to a City led peer review of the work prior to its publication.

Strategic Reviews are regularly procured by councils. Examples include the City's [Southern Enterprise Area Strategic Review](#) and the work that underpinned the [Pymont Peninsula Economic Development Strategy](#). Strategic Reviews have never been undertaken on behalf of individual landowners in the Sydney LGA.

At a minimum the Strategic Review must address:

- Local Planning Direction 1.15 – Implementation of the Pymont Peninsula Place Strategy, in particular:
 - the requirement to facilitate development consistent with the Pymont Peninsula Place Strategy
 - the requirement to facilitate development consistent with the Pymont Peninsula Economic Strategy
 - the requirement to align the planning framework with Planning Priority E7 Growing a Stronger and More Competitive Harbour CBD, of the Eastern City District Plan

It must include:

- **Strategic context and Literature review** - The consultant should gain an understanding of relevant strategic planning documents and previous studies relating to the study area and surrounds. The literature review should detail relevant work and studies undertaken to date and outline key findings and conclusions that will influence planning decisions for each sub-area. The final report, in detailing the literature review, should include as a minimum:
 - Identification and discussion of the relevant State and local planning policies impacting on the Study Area
 - General overview of international and national employment land use trends and how they are observed to be impacting on the Study Area
 - Overview of the strategies employed by other councils in the District to manage employment lands
 - Discussion on current built form and land use character of existing employment land (including their zoning history and land use trends over time); and
 - Discussion of any other key information emerging as part of the literature review.
- **Economic profiling and growth drivers** - The consultant will prepare an economic profile that provides an analysis and narrative of how the Study Area's economy has changed and will continue to evolve over time, including:

- The current economic role and character, including how each sub-area's unique social and built form characteristics and economic function has changed and will change over time and their role and contribution in meeting the productivity targets in the Metropolitan, District and LGA context.
- The productivity contribution of the Harbour CBD in terms of economic output and financial revenue by industry as compared to the Greater Sydney, Sydney LGA, and other capital city centres of economic activity. This should include a breakdown of existing businesses and their activity, jobs, and floor space by industry, GVA contribution, and location quotient.
- Current floor space use and capacity and how it has changed over time, as well as existing and historical vacancy rates (2012, 2017, 2022, current) to determine current demand for commercial and enterprise space and existing supply in the area. This should build on the latest census data and the results of the City's Floor space and Employment Survey and Capacity Study.

The consultant will need to provide an analysis of long-term industry and cluster needs and growth and the key drivers influencing future demand, including:

- Undertaking interviews with existing and potential future land owners and commercial/business tenants to identify market trends and key employment and productivity drivers, attractors and barriers that will influence future demand for employment space including factors that influence locational choice to 2041.
- Conducting a literature review of key City of Sydney studies and documents as per above and providing commentary on their key findings and how the findings from interviews detailed above compare with the consultant's own understanding of factors likely to influence future demand to 2041.
- Identifying key drivers by employment/industry sector influencing demand to understand the factors that drive locational choice for industries and clusters. This should include building typologies, preferred use mix (within buildings and locality), rental price points, and support infrastructure and services required by each industry/business sector.
- Identifying key development drivers and emerging trends for enterprise uses and industry clusters in each sub-area, including planning controls (available FSR / heights), infrastructure improvements, the emergence of industry sector clusters and their interrelationships with other industry sectors, and relationship with Harbour CBD, international trade gateways and other strategic centres in the Eastern Economic Corridor and West Metro Alignment. This should also include key factors that influence industrial and urban service and other enterprise space supply in the short, medium, and long term.
- Identifying threats and challenges to growing economically productive uses in each sub-area. This should include consideration of challenges that may

affect employment space supply and demand (including visitor accommodation), as well as threats that may erode the area's ability to accommodate evolving businesses and clusters.

- Detailing the role of each sub-area in accommodating future demand for employment uses based on forecasted worker, visitor, and surrounding residential growth. This should include consideration of future demand for specific retail and other non-residential uses, including both existing and uses other than what is planned now.
- Detail how strategic uses, including commercial, late-night, entertainment, affordable housing and creative uses can best take advantage of transport infrastructure and the area's existing enterprise character. This should also include consideration of potential changes to permissible uses to further encourage such strategic employment uses
- Detailing each sub-area's role in meeting the economic and employment lands/floor space needs in the Harbour CBD, the Eastern Economic Corridor and the West Metro Alignment
- **Land Use Scenarios and future context** - The consultant will develop scenarios based on the findings from above. These scenarios should include projections and recommendations on the long term demand for employment land in the Study Area. As part of this deliverables, the consultant should:
 - Describe the economic composition of the area and how it will change over time with reference to floor space requirements, built form preference, job type, industry, business size, worker profiles (age, sex, and place of residence), etc.
 - Forecast long term employment growth by industry type for the investigation area, and detail the evidence and assumptions used to inform those projections. Provide forecasts at 5-year intervals to 2041.
 - Determine the total amount of economic and employment floor space required by industry type to meet forecast long-term growth and describe where that floor space is best located given the learnings of the review. Provide forecasts at 5-year intervals to 2041. The forecast needs to consider several industry and employment sectors not only encompassed by the existing permissible land uses but also uses not catered for in Harbour CBD and/or other centres.
 - Detail the methodology used for making the above forecasts and describe any limitations.
 - Consider the impact of a range of transport scenarios to be determined with the successful consultant.

The consultant will provide recommendations to inform planning decisions for the Study Area. As part of this deliverables, the consultant should:

- Identify likely building typology and floor plate requirements of existing and future tenants, with reference to the short, medium and long term industry and cluster growth forecast for each sub-area.
- Identify local and state infrastructure needs (above and beyond current planned infrastructure investments) to support the short, medium and long term growth for each sub-area.
- Detail how the recommendations for each sub-area best achieve Local Planning Direction 1.15
- Any rezoning should be tested against updated employment and ridership forecasts to ensure Metro West's business case remains valid.

State Significant Development

2. Retention of existing building

The development proposes to retain much of the existing building and all the existing basement structure, and as such uses this to justify not delivering planned public open spaces within the Harwood Street view corridor.

The EIS must demonstrate that the proposed reuse of the existing building justifies the retention of the existing building footprint. Detailed information is to be submitted to enable the consent authority to understand the extent of building fabric proposed to be retained and the associated benefit this would have from an environmentally sensitive design perspective. This should be supported by structural engineering advice and consultant advice to identify the likely required upgrade works and their impact, particularly towards feasibility.

Failure to demonstrate that the proposal is an effective reuse would undermine use of the retention of the existing building footprint as justification inability to deliver the planned public open space.

3. Public Open Space

As outlined above the current proposal does not deliver the planned public open space within the Harwood Street corridor and instead intends to provide a smaller area of open space south of the primary commercial building form. It is understood this is intended to remain privately owned publicly accessible open space. The application is to address the intended ownership, public access and maintenance arrangements.

The application should demonstrate what the likely impact to the planned public open space within the Harwood Street view corridor would look like, including the likely future form following redevelopment of the adjoining sites in accordance with the City's planning.

A detailed view impact assessment through the Harwood Street view corridor is to be provided. This must demonstrate the view impact both in comparison to the existing site circumstances and the planned outcome under the City's draft controls.

The EIS should identify and analyse the planned public domain upgrades within Union Street and Edward Street surrounding Pyrmont Metro but should be careful to delineate the limited public benefits provided by the proposal itself.

4. Neighbourhood Connectivity

The proposed development must demonstrate how connectivity between Pymont Metro and places like the Pymont Light Rail station or Pirrama Road and the adjoining area to the north is enhanced. The City's Ultimo Pymont Urban Design Study demonstrates how this can be achieved along both Edward Street and the Harwood Street corridor, in both an interim and final arrangement. The EIS must demonstrate how equitable and dignified access is achieved and connectivity is enhanced.

5. Solar Access

The EIS must provide a comprehensive analysis demonstrating the solar access achieved to public open spaces, particularly streetscapes. A 2-hour minimum threshold (in mid-winter) should be adopted to ensure sufficient solar access is provided to support tree growth within streets.

The EIS must demonstrate that the cumulative overshadowing impacts comply with Objective 3B of the ADG. The City affirms that the ADG requires that where existing apartments do not achieve the required hours of solar access, then the additional overshadowing must not reduce the existing hours of solar access by more than 20% (in time) rather than by 20% of the number of the apartments within an adjoining building.

6. Wind

The EIS must demonstrate how the development and surrounding public domain will achieve the wind safety and comfort criteria established in Section 3.2.7 of the Sydney Development Control Plan 2012. A wind assessment (based on wind tunnel testing) identifying the impact of the proposal on surrounding wind conditions, including at street level, publicly accessible places and useable rooftop spaces is to be provided. Any mitigation measures required to ameliorate wind impacts are to be detailed.

7. Landscaping

The proposed development should explore opportunities to provide meaningful landscaping including deep soil planting to support tree canopy noting the City's Urban Design Study allowed the delivery of 15% deep soil. The EIS must address the City's Urban Forest Strategy.

8. Transport

Provide a Transport Impact Assessment (TIA) in accordance with the processes and methodology recommended in the Guide to Transport Impact Assessment (GITA) published by TfNSW. The TIA should use the 'Benchmarking' method of estimating trip generation as described in Section 5.5.3 of the Guide to Transport Impact Assessment whereby estimates of traffic generation use surveys of similar nearby sites rather than standard rates.

In addition, the following should be requested:

- If the construction of the development would cause interruptions to regular pedestrian and transport routes (including public transport, active transport or general traffic), a preliminary Construction Traffic (or Transport) Management Plan (CTMP) should be prepared as part of the TIA to mitigate any such impacts.

- A justification of car parking arrangements (provision and design) in accordance with the objectives and provisions set out in City of Sydney LEP and DCP. New or modified vehicle access driveways should be a maximum of 6m wide in accordance with the City of Sydney Technical Specifications (Part C).
- A justification of site servicing arrangements (provision and design) in accordance with the objectives and provisions set out in City of Sydney DCP. Surveys of loading demands generated by any uses proposed to be retained on site should be completed to support the proposed number of loading dock bays. Loading Dock must provide access for a 10.6m long City of Sydney Waste Collection Vehicle to fulfil Residential waste collection.
- Details of bicycle parking arrangements (provision and design), including end of trip facilities, for staff, residents and visitors in accordance with Sydney DCP and located on site in secure, convenient, accessible areas.
- Proposals to improve walking and cycling.

9. Waste Management

The EIS must detail that waste management facilities including waste infrastructure, waste storage areas, waste truck access and loading facilities comply with Council's requirements for waste management facilities in accordance with the SDCP 2012 and the City's Guidelines for Waste Management in New Developments (2018).

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

Yours sincerely,



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