

9 April 2024

Mr Peter Regan
Chair Executive
Sydney Metro
Level 43, 680 George Street,
Sydney NSW 2000

Dear Mr Regan

Pymont Over Station Development

The Pymont Over Station Development is the logical extension of the Sydney CBD around to the Pymont peninsula.

Urban Taskforce welcomes the Pymont OSD with its mixed-use podium and high-rise residential tower. With more similar developments, Pymont may well achieve the housing, employment and economic metrics projected by the Pymont Peninsula Economic Development Strategy and Place Strategy.

From these documents, comes the future vision of Pymont peninsular as a sophisticated and connected urban district just two minutes rail journey from Hunter Street. This is a once-in-a-generation opportunity to respond to the requirements of a rapidly urbanising Sydney and provide additional housing and commercial space to drive much-needed economic growth.

Don't "under-cook" height

The Pymont Peninsula Economic Development Strategy and Place Strategy as well as the former GSC's District Plan for Eastern Sydney, have clearly established the strategic merit for Pymont Peninsula as a high-rise area.

The SSD approval of the Harbourside development, a 43 story tower rising to RL 169.35, should stand as the precedent for height and density in the area.

The Harbourside building should drive the narrative of what is now needed for a rapidly urbanising water-bound western CBD. With limited developable sites available in Pymont, due to geography, heritage curtilages and potential impact of overshadowing, every effort to maximise potential residential opportunities should be taken. Where they do exist, and with due consideration given to the challenges posed by the National housing accord targets, these must be maximised.

The investment of public funds into Metro infrastructure is a sign of the weight placed on the revitalisation of Pymont by the NSW Government as a supplier of housing and employment. It also speaks to the peninsula's readiness for incentivising high-rise opportunities.

It is surprising that even as a SSD high-rise tower, the Pymont Over Station Development has been limited to a RL 120 ceiling. This is markedly lower than that of the Harbourside development. As it stands, the height limits are under-cooked.

Urban design typically avoids placing the highest structures directly on the waterfront. Further to this, the RL 120 ceiling is from water level, meaning high-rises developments building further up Pymont's geography will start at an RL of 20, allowing substantially less height for GFA. The RL 120 height ceiling appears an arbitrary limit that does not relate to the characteristics and merit of any future development.

There is a danger that, despite massive government transport investment, the height allowance will stifle the potential for the area as the worthy extension of the CBD.

Recommendation 1: that planning remove the RL 120 ceiling and use the Harbourside development as a precedent for the height limits for this proposal.

Solar Access and Over Shadowing

Pymont Over Station Development has been configured to preserve solar access and minimise overshadowing of residential dwellings, public domain and open spaces.

However, the Sydney Metro Pymont Over Station Development Newsletter states that no additional overshadowing impacts are proposed to Elizabeth Healey Reserve from the building. It appears that over-shadowing considerations have been seen as a priori constraints. They should not be.

Pymont peninsular is complex. This complexity arises from its history, typography, proximity to the CBD of Sydney and the surrounding bays of Sydney Harbour. This complexity also presents challenges and juxtapositions when considering opportunities for renewal, particularly when that renewal involves changes to land use.

The fact is, this peninsular has been deemed to be appropriate for high density, high development renewal, consistent with the expansion of Sydney CBD. The philosophy which drove the height approved for the Harbourside development should apply to this site too. While the 20-year vision in the 'Pymont Peninsula Economic Development Strategy' and 'Place Strategy' will necessarily cause some over-shadowing while it is being implemented, the view must be to the future.

Recommendation 2: Solar access overshadowing limitations should not be assumed a priori for all residential dwellings, public domain and open spaces. The longer term goals for Pymont must drive decisions on landmark developments like the Pymont OSD.

Balance Live, Work and Play

Pyrmont has a history of providing industry whilst being a place for entertainment. With the further development of the Peninsula, it is important to respond to urban dynamics and maintain the balance of residential buildings, employment, retail and entertainment. This can only be achieved with a change to the mix of land uses or additional height. In light of the above, Urban Taskforce suggests the latter.

Residential opportunities on this site could be maximised with additional height.

Recommendation 3: Maximising residential opportunities on this OSD site should be realised with additional height. This would set an important precedent for the development of other sites on the peninsular.



Image retrieved from: Dom Perrottet, 31 July 2020

<https://www.domperrottet.com.au/news/pyrmont-perfectly-poised-for-vibrant-future/>

Conclusion

Urban Taskforce members welcome the decision of the government to stimulate the revitalisation of the Pyrmont Peninsular with the public investment committed towards the new Metro station.

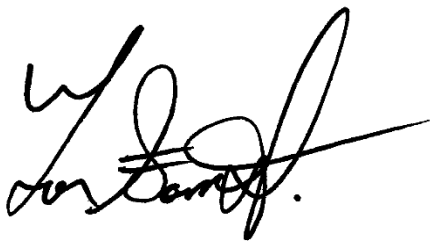
The Over Station Development must give effect to this opportunity. The documents, as exhibited, appear to talk down the vision for Pymont as an extension of Sydney's CBD. Instead they give undue weight to concerns for local amenity for existing residents in dwellings that reflect their existing form without considering the potential for change as foreshadowed in numerous strategic plans for this precinct.

It is vital that this development set a precedent for developments that follow. This will ensure a substantial contribution to housing and employment are available to match the potential of the transport infrastructure, proximity to the CBD and desirability of the area.

Pymont only has one chance in this generation to adequately address its future, and this is that chance.

Should any Committee member wish to discuss matters relating to this submission, please contact Head of Policy, Planning and Research, Mr Stephen Fenn on 9238 3969 or via email stephen@urbantaskforce.com.au

Sincerely

A handwritten signature in black ink, appearing to read 'Tom Forrest', with a long horizontal flourish extending to the right.

Tom Forrest
Chief Executive Officer