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31 October, 2020

The Team Leader,  
Key Sites Assessments, Planning and Assessment,  
Department of Planning, Industry and Environment,  
Locked Bag 5022,  
PARRAMATTA NSW 2124

Dear Team Leader,

Amended Concept Proposal and Stage 1 Early Works - Harbourside Shopping Centre  
Redevelopment (SSD-7874)

Pymont Action Inc., in its submission (1/2/17) on the original Concept Proposal, opposed this proposal on the following grounds:

- It represents the privatization of a site designated in 1988 to operate as a Festival Market as part of a Darling Harbour gifted to the people;
- The proposal should be evaluated on cumulative impact grounds not in isolation of what may evolve in the development of future planning strategies in Pymont/Ultimo, and rejected on the grounds that it sets a building envelope precedent,
- The scale of the project
- Traffic and transport impacts
- Pedestrian/cyclist access
- Need for a retail strategy which activates ground level frontages and addresses the needs of the local communities, and provision of social infrastructure, including additional Affordable Housing (public), childcare, health, sporting and aged care, possibly through developer levies
- Heritage impact on the Pymont Bridge

Since 2017, a number of actions have been taken by the NSW Government which can influence the outcome of the assessment of this proposal:

- The Cockle Bay concept plans for its redevelopment have been approved
- The proposal for a 61-storey hotel/residential tower on the site of The Star was rejected, noting that its excessive height was partly justified by citing the heights of the ICC Hotel and the proposed height of the initial Harbourside redevelopment concept plans;
- As a consequence, the GSC was instructed by the Premier to undertake a rushed review of planning in the Pymont/Ultimo Peninsula;
- The equally rushed draft Pymont Peninsula Place Strategy was put on public exhibition by the Department of Planning, public submissions received, with the finalized PPPS and associated sub-precinct Master Plans to be announced at the beginning of November.



We note that further adjustments have been made to the proposal, in response to the 61 submissions to the earlier Response to Submissions concept proposal received in April, 2020, primarily from members of the public (8 from organisations including Pyrmont Action Inc). The overwhelming majority of these opposed the proposed development, yet this strong and persistent opposition from individuals and community groups who care about their neighbourhood, and who object to the alienation of our public land continues to be ignored. Yet we feel obliged to, once again, address the inconsequential changes proposed, as follows:

Reduction in height of a small portion of the northern podium to create a 1,500sqm public open space - Whilst this reduction in height of the podium will slightly improve the view impacts on the residents in the adjoining 50 Murray Street, there will continue to be impacts on views of lower apartments.

Provision of "Guardian Square" - The amount of space to be made available to the public is ridiculously small, with much of it taken up by concrete walls and paths, all with hard geometric configuration so alienating to what's left of the natural form of the harbour. We ask why a more natural landscape cannot be created, with more trees, and fewer structures. We also wonder why the much larger expanses of green roofs are not part of the public domain. We note that this Square (which is a triangle) will be publicly accessible 24/7. This will likely generate even more noise and anti-social behaviour than is experienced already by residents of 50 Murray Street. At least currently, Harbourside provides a buffer from such disturbances.

Increase in height of the residential tower to offset loss of area in the podium - We are well aware of the identification of Harbourside as a Key Site in the draft PPPS and have strongly opposed such excessive height in all such sites in our submission to DPIE. It is cynical in the extreme to "offer" 1,500 sq m of public park, then seek to offset this by an increase in height of the tower to that proposed in the draft PPPS. And, once again, the proponent has cynically claimed "consistency of this excessive tower height with the existing and future context" by citing building heights in Barangaroo, the CBD and the Haymarket, totally ignoring the local context of buildings in Pyrmont and Ultimo. This tower will cast its shadow on a large area of residential development, but this latest RtS only talks about its impact on the CBD and Darling Harbour. It's as though Pyrmont and Ultimo don't exist!

Public Benefit - The only public benefit we can identify appears to be the proposed Guardian Square. Whilst we note the claim that this latest concept proposal provides 8,200 sqm of public open space, when you dig deeper you discover that in addition to the paltry 1,500sqm Guardian Square, the rest of the total open space is made up of steps and stairs, concrete pathways linking spaces and the claimed widening of the boulevard. However, when one turns to p21 of the latest RtS you find that whilst there might be a net increase in the total area of the boulevard, the area of the current public plaza outside Harbourside has been reduced by around 50%. This plaza is a gathering place. The proposed boulevard is just a pathway of around 20m width in its entirety, as the proposed podium encroaches ever closer to the water.



Despite the Premier's wish to extend westwards the building form of the CBD, with its dark narrow canyons of streets and mediocre to poor, and architecturally derivative buildings thrusting phallicly ever higher into the sky, Pyrmont has been Master Planned to support building forms which are intermediate in height sitting comfortably between the CBD and Glebe. The Peninsula continues to grow, with new commercial and residential developments recently completed, or nearing completion. These most recent buildings meet Direction 2 of the draft PPPS in that they "complement and enhance the area" and "sit comfortably with terrace housing, smaller shops and heritage areas".

In 2017, we rejected the proposed development outright. Since that time, we outlined in our April, 2020 submission, a compromise development we would be prepared to accept in which the structure:

- is reduced in height and scale to complement the scale and character of the built environment of Pyrmont;
- Does not compromise existing views
- Does not overshadow properties in SW and W Pyrmont, nor the waters of Cockle Bay
- Does not generate adverse visual impacts from Pyrmont and Sydney Harbour
- Avoids setting a height principle for future developments in Pyrmont, including any developments at The Star Casino and Blackwattle Bay
- Includes 4 levels of publicly managed Affordable Housing
- Does not include commercial space
- Is supported by provision of adequate public transport
- Includes provision of social infrastructure, including public courts and an indoor cinema

Our position on this latest offering from the Harbourside redevelopment proponent has not changed. It has only hardened. The NSW Government is playing the public for fools with its sham commitment to tick-a-box "consultation". It is no such thing. It's a farce, yet we, the volunteer public who care about our city and our Place, are forced to play this rotten game. If we don't, it is likely that even more excessive development will be forced upon us. This is the third submission we have poured our hearts and souls into despite knowing that our voices will not be heard. We remain to be convinced that the voice of the people really matters. Surprise us!

Yours sincerely,

Elizabeth Elenius, Convenor

Cc Hon Rob Stokes, Minister for Planning and Public Spaces; Cllr Clover Moore, Lord Mayor; Alex Greenwich, Member for Sydney

