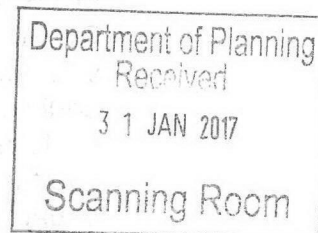


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Elizabeth Elenius, Convenor
9C/2 Bowman Street
PYRMONT NSW 2009
Tel: 9571 9727; 0409 552 117
Email: eelenius@bigpond.net.au
www.pyrmontaction.org.au

1 February, 2017

Ms Michele Nettlefold,
Department of Planning & Environment,
Level 22, 320 Pitt Street,
SYDNEY NSW 200



Dear Ms Nettlefold,

Concept Proposal – Cockle Bay Wharf Redevelopment

In formulating this submission, Pyrmont Action notes the following:

Planning Context – The Darling Harbour Development Plan No 1 (DHDP) is the principal planning instrument applying to the site. This instrument defines the type of development that may occur – almost anything goes. In addition, “there are no maximum building heights or Gross Floor Area (GFA) restrictions imposed by the DHDP, and no other detailed controls or provisions that guide or restrict the form of development on the Site.” Therefore, the Department (or PAC) can chose to evaluate the proposal on good planning and environmental impact grounds, or on economic impact grounds, in particular on the investment decisions taken by the developer and on the income to be generated for the NSW Government. The “anything goes” principle can apply equally to the developer and to the Department (PAC). Pyrmont Action expects the Department to evaluate this proposal on planning and environmental impacts and public good outcomes. Siting a building of this height and magnitude so close to the harbor and to the heritage Pyrmont Bridge is inherently bad planning.

Recommendation: The Cockle Bay Wharf redevelopment proposal must be determined on planning and environmental impact grounds, and public good outcomes, not extraneous profit motives of the developer and government.

Integrated Planning – Whilst the proposed development is on the CBD side of Cockle Bay, it will still impinge on the amenity of Pyrmont and Ultimo, already hugely blighted by the construction of blank-walled edifices associated with the ICC development. Darling Drive has been reduced to two lanes, resulting in traffic jams associated with events at ICC. In addition to the proposed Cockle Bay Wharf redevelopment we are now faced with a 50-storey retail/residential redevelopment on the Harbourside



site, a 50-storey hotel/residential complex associated with The Star, the Ribbon development, and the Bays Precinct Urban Renewal project – all of which will have a significant cumulative impact on the amenity of Pyrmont and Ultimo residents through traffic congestion, overshadowing, view loss, loss of views to and from the heritage Pyrmont Bridge as well as additional pressure on social infrastructure (schools, childcare, health facilities, sporting facilities, etc. etc.) WestConnex, which directs traffic into the city and elsewhere via the Anzac Bridge will also have a dramatic impact on traffic and parking in Pyrmont/Ultimo and the CBD. We note the position of the Greater Sydney Commission's District Commissioner – Central District (letter to PA dated 22 December, 2016): "I agree with you that a coordinated approach to planning and working with relevant stakeholders are necessary...". Yet neither the GSC, nor the City of Sydney have jurisdiction over Sites of State Significance such as the Cockle Bay Wharf site and this Concept Proposal, and the others listed, will all be assessed in isolation of each other in a no-rules context. This proposal MUST not be assessed as an isolated development, but within an integrated plan for the whole of the Darling Harbour, CBD and adjacent suburbs.

Recommendation: Consideration of this proposal should be deferred pending the development of an integrated plan for future development affecting Darling Harbour, the adjacent CBD and Pyrmont and Ultimo. Such planning should be overseen by the Greater Sydney Commission and conducted in close consultation with the local community, as well as relevant local and state government agencies responsible for traffic, transport, childcare, health, education, sporting and community facilities.

Rationale for the Proposal – We note the rationales for this Concept:

- The existing building is not well integrated with the City
- The Western Distributor acts as a barrier
- Critical pedestrian links can be improved
- Darling Park Crescent Garden is not well utilized
- The existing building is outdated

and agree with most of them. But low impact measures to address these issues have not been considered at all by the developer, resulting in a proposed building envelope impinging on the foreshore, towering over the heritage Pyrmont Bridge and throwing shadows as far afield as Pyrmont.



Recommendation: Reduce the building bulk to a scale compatible with adjoining commercial and residential buildings and situate both the commercial tower and retail podium away from the Pyrmont Bridge and the waterfront; reduce the height of the podium level to that of the existing development;

Pyrmont Action Inc representatives have met with agents of the developer on one occasion (4 November, 2016). We provided verbal comment which was summarized by Newgate Engaged and which is included in the EIA. On the limited information presented, we proposed a number of measures to mitigate against loss of amenity, to improve access between Pyrmont/Ultimo and the CBD and replacement of public facilities such as the all purpose courts, removed from Darling Harbour a number of years ago when the SEGA Centre was constructed. Now that the Concept Proposal has been released, we make the following comments:

Scale of Project – The building envelope of the commercial tower, as presented, is of considerable bulk and sits on an equally bulky podium which looms over both the Pyrmont Bridge, and the waterfront. Whilst the designers have indicated that “the main consideration for the height limit is the projection of mid-winter solar access to Tumbalong Park from 12 – 2pm, they have completely disregarded the overshadowing of the building on both the Cockle Bay waters and the buildings on the Western side of Darling Harbour. Its bulk will also block views and light from residential buildings to the East.

Recommendation: Reduce the building envelope of both the tower and the podium to reduce overshadowing and visual impact on the Pyrmont Bridge, Cockle Bay, the waterfront, and buildings in the CBD and Pyrmont.

Building Placement – Whilst we agree with the Design Principles (p32, EIA), we fail to see how the Concept Proposal as outlined “enhances the waterfront”. It makes no planning sense to tuck the parkland and open space away behind the proposed building, with Darling Park to the north, and city high rise buildings to the east, blocking sunlight for much of the day and for much of the year. The public open space should be at the front of the development, with the building component stepping up from the waterfront behind it. One of the reasons that the existing park is not well patronized is that no one knows it’s there and the same situation will prevail with a park set behind this huge development. A slender and lower tower, or a tapering tower such as The Shard in London, would not



now redirecting all developer contributions collected from ongoing developments in Pyrmont and Ultimo to other parts of the City, primarily Green Square. The Cockle Bay Wharf development should incorporate facilities such as childcare, and a community centre, noting that there is no such facility in the central CBD. As popular sporting facilities were removed from Darling Harbour some years ago, and not replaced as promised, incorporation of an indoor facility, similar to the King George V Centre at The Rocks, is essential

Recommendation: The developers of the Cockle Bay Wharf redevelopment, and other developers to consult with local community groups to ensure that developer contributions (either cash or in kind) are allocated to social infrastructure projects that address unmet inner city community needs.

In summary:

- *The Cockle Bay Wharf redevelopment proposal must be determined on planning and environmental impact grounds, and public good outcomes, not extraneous profit motives of the developer and government.*
- *Consideration of this proposal should be deferred pending the development of an integrated plan for future development affecting Darling Harbour, the adjacent CBD and Pyrmont and Ultimo. Such planning should be overseen by the Greater Sydney Commission and conducted in close consultation with the local community, as well as relevant state and local government agencies responsible for traffic, transport, childcare, health, education, sporting and community facilities.*
- *Reduce the building bulk to a scale compatible with adjoining commercial and residential buildings and situate both the commercial tower and retail podium away from the Pyrmont Bridge and the waterfront; reduce the height of the podium level to that of the existing development;*
- *Reduce the building envelope of both the tower and the podium to reduce overshadowing and visual impact on the Pyrmont Bridge, Cockle Bay, the waterfront, and buildings in Pyrmont.*
- *The proposed building envelope and placement should be rejected on the grounds that the podium is too high, too close to the waterfront and Pyrmont Bridge, and the tower obscures light and views of nearby residents, overshadows residential buildings in Pyrmont and the waters of Cockle Bay; the public parkland should be on the waterfront, with the buildings behind, and well away from the Pyrmont Bridge.*
- *As part of our proposed integrated plan for Pyrmont/Ultimo, extend the Harris/Fig Street walkway to provide direct pedestrian/cycle access to the*



CBD; and install a lift to the Western Distributor walkway. Ensure clear wayfinding signage out of Darling Harbour, and within it

- *Conduct up-to-date traffic impact studies for all major intersections associated with Darling Harbour developments, including in Pymont and Ultimo as part of the integrated planning for the peninsula and the Western CBD*
- *Explore options for improving the public transport options to serve Pymont/Ultimo/Darling Harbour, as part of the proposed integrated plan for Pymont/Ultimo and the CBD.*
- *The developers of the Cockle Bay Wharf redevelopment, and other developers to consult with local community groups to ensure that developer contributions (either cash or in kind) are allocated to social infrastructure projects that address unmet inner city community needs.*

Pymont Action opposes this Concept Proposal in its current form. We reject the bulk, height and placement of the commercial tower component and podium on planning and environmental impact grounds.

Yours sincerely,



Elizabeth Elenius, Convenor

cc the Hon Rob Stokes, Minister for Planning and Environment, Alex Greenwich MP, Clr Clover Moore, Maria Atkinson AM, GSC

