

4 December, 2017

Mr Chris King,
Department of Planning & Environment,
Level 22, 320 Pitt Street,
SYDNEY NSW 200

Dear Mr King,

Amended Concept Proposal – Cockle Bay Wharf Redevelopment

We have examined the amended Concept Plan, again noting that 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 within the DHDP Plan No 1. Given the location of this podium and tower at the Eastern end of the Pyrmont Bridge, we have strong concerns that approval of the amended scale of the building envelope will be used to justify similar height and scale of buildings now proposed on the Western side of the Pyrmont Bridge (Harbourside redevelopment and residential/hotel tower at The Star).

We repeat our concerns addressed in our earlier submission on the first concept plan:

Scale of Project – We recommended the reduction of the building envelope of both the tower and the podium and note that the tower has been reduced in bulk and by 40m in height in the amended plan. We also note that there is likely to be some overshadowing of the foreshore area between 9am and 11am, and of the Crescent Garden, with the likelihood of some shadowing impact on the future Town Hall Square. The perspectives provided still depict a tower significantly higher than adjacent buildings. The shadow diagrams are so poorly drafted that it is almost impossible to ascertain the impacts on facilities such as the children's playground, and on the water, including on winter mornings but there appears to be shadowing of the water between 9am and 11am. *We recommend a further reduction in the scale of the development with a height of no more than 35 storeys.*

Building Placement – The amended plans have responded to concerns about the proximity of the tower to the end of the Pyrmont Bridge but the podium is still too close to the bridge. We note provision of additional



public open space next to the bridge, which is welcomed. However, the front edge of the podium is still far too close to the water's edge. We note that, in anticipation of the Harbourside redevelopment proceeding, Property NSW has commenced installation of a boardwalk structure over the water, thus reducing this precious area of harbour. *We recommend a further setback of the podium to no less than 24m to ensure that there is no prospect of further encroachments by Property NSW over the water.*

Access – It appears that the developer is of the view that everyone in Pyrmont only accesses the CBD via the Pyrmont Bridge or Darling Harbour. We continue to urge the reinstatement of a direct link from Harris/Fig Street to the CBD (removed when the extra bus lane was added to the Western Distributor) and the installation of a lift to provide disabled access on to the Western Distributor walkway using developer contributions. *We recommend provision of additional direct pedestrian access to the CBD from Pyrmont.*

Traffic and Transport – The EIA still relies on traffic surveys conducted in 2016 well before the ICC facilities began operating, which take no account of the Darling Walk developments, nor the future impact of the Ribbon development (noting that IMAX was operating at the time of the surveys). We again comment on the ever-increasing number of delays around the intersection of the W Distributor and King Street during evening peaks. Taxi drivers have commented that they hate having to drive patrons anywhere near Barangaroo. The report makes no reference to the impact of additional traffic generated by WestConnex which will channel (unspecified) additional traffic on to the W Distributor which will result in further impacts in and around all exits, including those close to Cockle Bay. Furthermore, there could be impacts even as far away as Harris Street, Pyrmont which has been identified as the second most congested road in Australia. *We continue to recommend that the Dept of Planning insist that the proponent conduct up-to-date traffic impact studies for all major intersections associated with Darling Harbour developments, including in Pyrmont and Ultimo as part of the integrated planning for the peninsula and the Western CBD.*

We continue to be bemused at the statement that “the site is well located to existing and future public transport services in the area”. Whilst the Light Rail system, when expanded, may provide some improvements to public transport in the Darling Harbour area, at present, the bus transport system where it exists at all, is extremely limited, and unreliable as traffic congestion brings buses to a complete standstill for long periods. The



existing ferry service to and from Circular Quay runs at 30 minute intervals, but not late at night. It should also be noted that whilst there is a ferry service which runs from Circular Quay, stopping at Barangaroo and Pyrmont Bay, on the return journey, it goes directly to Balmain East from Pyrmont Bay, missing Barangaroo altogether. We have been seeking a new ferry service for the Bays Precinct, so far unsuccessfully. To state that Wynyard is “within close walking distance” to Cockle Bay is simply ridiculous. *We recommend that (a) further traffic studies be undertaken to take account of new and proposed developments in the Darling Harbour area; (b) that new and improved public transport services be implemented to serve Pyrmont/Ultimo/Darling Harbour, as part of an integrated plan for Pyrmont/Ultimo and the CBD, both involving meaningful consultation with community and business representatives.*

Community Benefit –There is no reference in the EIA to provision of social infrastructure to support the development’s new workers, and the existing CBD and nearby Pyrmont community. In Appendix A it is stated that social infrastructure “may” be provided as part of a future detailed DA. Much is made of the provision of landscaped open space, but the images depict a series of hard-surfaced terraces, with trees along the narrow walkway in front of the podium near the water’s edge. We note the popularity of the Barangaroo headland which provides an attractive, green and natural environment, providing shade and habitat through use of native plants and trees. We recommend early and genuine consultation with the residential, worker and visitor population who live, work and play in the vicinity of Darling Harbour (including the Pyrmont/Ultimo and Haymarket communities) to ensure that this open space meets their needs. In our earlier submission we made reference to the need for childcare and sporting facilities, and, possibly a community Centre as these are largely absent in the centre of the city. It should be noted that popular sporting facilities were removed from Darling Harbour some years ago, and not replaced as promised. A public indoor sporting facility, similar to the King George V Centre at The Rocks, should be incorporated into the development. *Recommendation: The developers of the Cockle Bay Wharf redevelopment should consult with local community groups to ensure that the project is of community benefit in more ways than just provision of open space. Developer contributions (either cash or in kind) should be allocated to social infrastructure projects that address unmet inner city community needs.*

In summary the Cockle Bay Wharf redevelopment must:



- *Reduce the building envelope to a scale compatible with adjoining commercial and residential buildings and ensure that it does not overshadow public spaces; situate the retail podium further away from the Pyrmont Bridge and at least 24m from the waterfront; reduce the height of the podium level to that of the existing development;*
- *Improve direct access linking Pyrmont/Ultimo with the CBD by extending the Harris/Fig Street walkway to provide direct pedestrian/cycle access to the CBD; and install a lift to the Western Distributor walkway which should be retained.*
- *Conduct up-to-date traffic impact studies for all major intersections associated with Darling Harbour developments, including in Pyrmont 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 Pyrmont/Ultimo/Darling Harbour, as part of the proposed integrated plan for Pyrmont/Ultimo and the CBD.*
- *The developers of the Cockle Bay Wharf redevelopment consult with local community groups to ensure that the project delivers social and sporting infrastructure projects that address unmet CBD and inner-city community needs.*

Pyrmont Action still has concerns with this amended Concept Proposal. We reject the bulk, height and placement of the commercial tower component and podium on planning and environmental impact grounds. Above all, we again stress the need for this, and other proposed major developments in the vicinity of Darling Harbour and Pyrmont/Ultimo to take into account the cumulative impacts of all proposals on the drawing board, including WestConnex, Harbourside and The Star residential/hotel tower.

Yours sincerely,

Elizabeth Elenius, Convenor

cc the Hon Anthony Roberts, Minister for Planning, Alex Greenwich MP, Clr
Clover Moore, Maria Atkinson AM, GSC

