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13 November, 2019

Mr Rodger Roppolo,
Department of Planning, Industry and Environment,
GPO Box 39,
SYDNEY NSW 2001

Dear Mr Roppolo,

SSD-8925 – New Sydney Fish Markets – Main Works Development Application

We have made separately a submission on the Concept DA and Early Works and are at a loss to understand why the Main Works DA is being considered concurrently with the Concept DA. Surely the Main Works DA should be developed in response to submissions on the Concept DA and the examination thereof by the Department of Planning?

We note (EIS p93) that part of the site is within an area on which development consent cannot be granted unless there is a Master Plan for the land and the consent authority (ie the Minister for Planning) has taken the Master Plan into consideration. Currently, there is no Master Plan for this site and the Concept Plan (SSD-8924), which the EIS claims can satisfy this obligation (EIS p94-95) has been submitted concurrently with this DA. We are of the view that whilst the Concept Plan once approved can feed into the development of the Master Plan for Blackwattle Bay, consideration of this DA should be postponed until that Master Plan has been approved.

Recommendation 1: Consideration of the DA for Stage 2 Works should not be undertaken until the Blackwattle Bay Master Plan has been approved.

This delay is essential in order to be able to determine the cumulative impacts associated with the redevelopment of the current SFM site and other sites in Bank Street.

This submission identifies many of the issues raised in our response to the Concept DA, but will also endeavor to identify issues not raised therein.

General – Pyrmont Action Inc has long supported the redevelopment of the Sydney Fish Markets and do not oppose the proposal for the new Sydney Fish



Markets (SFM) at the head of Blackwattle Bay. However, our support for this DA is conditional upon issues identified below being addressed prior to construction.

We have sought opinion both from our membership, our community group network, and from our friends and neighbours. Whilst the design of the facility and its surrounding public domain has been welcomed, there are continuing strong concerns about a number of impacts which have not been addressed in either SSD-8924 or the concurrent Major Works DA SSD-8925. These are:

- Traffic and parking impacts
- Lack of conveniently located public transport
- Permanent curtailing of rowing route
- Unknown cumulative impacts

Traffic and Parking Impacts – We note the inclusion of a new set of traffic lights at the Pyrmont Bridge Road/Wentworth Park Road intersection. Currently, traffic in the morning peak hours banks up back as far as Booth Street, Forest Lodge and it can be anticipated that this will be exacerbated by the installation of another set of lights close to those controlling access to Blackwattle Bay High School Campus. We appreciate that these lights will enable cars driving from the East to turn right into the SFM parking area, but there is no information provided on how vehicles travelling West and wishing to drop off visitors will be able to access the drop-off zone. Presumably, they will be permitted to do a U-turn into this zone at the same time as other vehicles are entering the carpark (Concept DA EIS p35).

Recommendation 2: Ensure traffic lights at Wentworth Park Road indicate the ability of drivers to make a U-turn if travelling from the East along Pyrmont Bridge Road.

At present, Pyrmont suffers from ongoing congestion, both at peak hours and at busy weekend periods, at major intersections along Pyrmont Bridge Road, including Wattle Street, Bank Street and Harris Street. Given that currently private vehicles account for 45 – 50% of all journeys (Concept DA EIS p121) and that visits to the new SFM is anticipated to double in 10 years (Concept DA EIS p122), it is hard to take seriously the prediction that “car usage... by staff and visitors travelling to the new SFM will decline compared to current levels”. Even if there is nearby public transport, many visitors will continue to drive their cars to the SFM, as it is extremely inconvenient to carry large food containers on public transport, especially if travelling long distances requiring several changes of transport modes.



In addition, we are still unaware of the scale and nature of the development that will take place on the current SFM site, and, thus, the increased traffic that will be generated, noting that the road under the Western Distributor narrows to one lane each way between the lights in Bank Street at the Anzac Bridge off-ramp and the current entry to the SFM.

Recommendation 3: The proponent to consult community representatives, together with representatives of RMS and the Department of Transport, and the consultants preparing the Blackwattle Bay Master Plan, to consider improvements to the road system in the vicinity of the proposed new SFM prior to any work commencing on the site.

Given that the number of parking spaces remains the same as on the current site, and that it anticipates that demand will exceed provision by ~80 spaces at weekends and peak periods such as Easter and Christmas, it will be necessary to erect large electronic noticeboards indicating the number of spaces available in the carpark. They will need to be seen by drivers travelling both East and West along Pyrmont Bridge Road, and to the North along Wentworth Park Road.

Recommendation 4: Install electronic noticeboards to advise drivers of the availability of parking within the SFM carpark.

We note measures outlined to achieve a reduction in demand for car spaces, including reduction of staff parking by 50%, and charging market rates for both staff and visitors (Concept DA EIS p36). We also note the recommendation that visitors can use "off-street car parks in close proximity to accommodate overflow parking demands" (Concept DA EIS p123). We are unaware of any such "off-street car parks" in close proximity to the proposed new SFM. The nearest such car parks are in the grounds of the Wentworth Park Greyhound Racing precinct but spaces are limited. The only other such carparks are those associated with the Darling Harbour precinct, and they are (a) about 1km from the site; and (b) are heavily used at weekends and during the holiday periods, so are of limited use as an alternative to on-site parking. In our submission to the Call for Great Ideas, we proposed negotiating commercial carparking on the City of Sydney Fig/Wattle Street depot site, but unfortunately the proponent for the new SFM did not pursue our idea and this site has now been sold for mixed use development. The developer has submitted their concept plans to Council but it may not be too late to negotiate such a commercial carpark to take the overflow.

Recommendation 5: Proponent to investigate provision of a commercial carpark on the Fig/Wattle Street Council depot site and/or within the Blackwattle Bay Master Plan area.



The other proposal to ameliorate demand for parking spaces is the provision of the drop-off zone “to allow visitors and shoppers to be collected out front”. The majority of such visitors are currently conveyed to the SFM by tour bus operators who go on to park (generally without paying) on both sides of Bank Street, and elsewhere in Pyrmont, in the lunch-time peak. It can be anticipated that they will continue to take up parking spaces which could be used by other patrons wishing to access the new SFM. Smaller buses often have trailers attached so take up at least 2 car spaces. Larger buses take up 3 spaces. With the entrance to the SFM located at the W end of the development, it is likely that overflow and bus parking will also migrate into the largely narrow streets of Glebe. A possible site for off-street tour bus parking could be in the space above the Fish Markets light rail station; alternatively, there is room on land owned by RMS entered off Pyrmont Bridge Road close to the light rail corridor. RMS currently has a temporary office located on part of this site.

Recommendation 6: The proponent to negotiate provision of off-street dedicated tour bus parking within the Blackwattle Bay MP precinct.

It is foreshadowed (Concept DA EIS p121) that 4 disabled parking spaces will be provided, yet in the EIS for the Main Works Development Application (EIS p39) it is stated that 6 such spaces will be provided. That is a very small percentage of the total of 417 on-site spaces proposed.

Recommendation 7: A minimum of 10 disabled on-site parking spaces should be provided.

Public Transport – There is little evidence presented in the EIS to support the claim that there will be a decline in car usage despite a doubling of all journeys. The factors which will achieve this unbelievable foreshadowed reduction include (as yet unannounced) improvements to public transport serving the area (Concept DA EIS p122). Pyrmont Action has long sought a new bus service running from Pyrmont to the Broadway Shopping Centre via Harris Street, and returning via Glebe Point Road and Pyrmont Bridge Road to Pyrmont. The latest letter from the Minister for Transport (dated 14/10/2019) states that the Government has no plans to initiate such a service. We therefore support the recommendation in the Concept DA EIS (p126) that Infrastructure NSW “work with Transport NSW to investigate providing improved bus services to support access to the Sydney Fish Markets and wider Blackwattle Bay”. Consideration should be given to the initiation of an On-Demand bus service, with wheelchair access, to serve this route. Any discussions initiated by Infrastructure NSW should include local community representatives from Pyrmont, Ultimo and Glebe.



Recommendation 8: Approval of both the Concept Development and Stage 2 Works DA should be conditional upon provision of a new bus service to serve Pyrmont, Ultimo and Glebe passengers, stopping at Broadway and the new SFM.

The letter also refers to introduction of a new, on demand ferry service with a stop at the current SFM and note that it is attracting increasing levels of patronage. We also note that a Bays Precinct service is foreshadowed in *Sydney's Ferries Future* (May 2013). We strongly support such services and, again, ask that community representatives from suburbs around the Bays Precinct be consulted as to the route of a future Bays Precinct service.

Recommendation 9: A condition of approval for both the Concept Development and Stage 2 Works DA should be community engagement in the planning for the route of the proposed future Bays Precinct ferry service.

The EIS (pp 13, 47, 91) claims that the new SFM is served by three light rail stops "all within a short walk". These short walks range, in fact, from 250m to 500m which would not be too onerous if one wasn't carrying bags, or wasn't disabled and/or elderly. There are numerous references to the proposed West Metro railway line, with the announced stop proposed for the Bays Precinct (Concept DA EIS p126). There are also vague references to a possible Metro station in Pyrmont. The Minister's letter also refers to the "strategic option" for a station at Pyrmont which is under investigation. Given that Google withdrew from its proposal to develop the White Bay Power Station "destination" because of lack of public transport and appropriate road access, it is difficult not to conclude that the Bays Precinct station will be in that vicinity which is a long distance from the new SFM. Until the Government confirms a Pyrmont station, it should not be mentioned as a transport option for visitors to this site. We strongly support a station in Pyrmont, which would help take cars off roads in the vicinity of the new SFM, especially the infamous Pyrmont interchange, and would serve current and future residents, workers and visitors to other venues in Pyrmont and nearby, eg Darling Harbour.

Recommendation 10: Approval of both the Concept Development application and Stage 2 Works DA should be conditional upon a decision to include a Pyrmont station for the proposed West Metro, location to be determined in consultation with local community representatives.

Passive Boating – We are concerned to note that the development will require a permanent shortening of the rowing route at the head of Blackwattle Bay to maintain a minimum distance of 45-50m between the route and the proposed



wharf structures (Concept DA EIS p130). Elsewhere (Concept DA EIS p54) it is stated that representatives of the rowing groups have expressed their concern and that all parties are to consider solutions and meet to resolve the issue. It should be acknowledged that Glebe Rowing Club has been operating in the bay since 1879.

If the rowing route is shortened, rowers will be unable to train in a competitive environment, and regattas such as one held in Blackwattle Bay several years ago, will not be able to be accommodated in the future as the route will not be of an appropriate length for competitions.

Recommendation 11: The wharf configuration should be revised to ensure that the operations of the rowing clubs are not curtailed.

Cumulative Impacts – Whilst we are not opposed to the relocation of the Sydney Fish Markets to the head of Blackwattle Bay, we are concerned that the EIS does not address the permanent cumulative impact of the development and the future development of the current SFM site. The only reference we could find in the Concept DA EIS (p131) refers to the possible cumulative impacts of “two or more projects ...carried out concurrently and in close proximity to each other”. This reference was made in the context of the proposed developments on Glebe Island and we agree that they are “at a sufficient distance” that cumulative impacts would not occur during construction or on-going operational activities”, as the Glebe Island activities will involve additional traffic on James Craig Road, Anzac Bridge and the Crescent, whereas the roads in the vicinity of the new SFM are primarily Pyrmont Bridge Road and Wattle Street.

However, whilst the new SFM construction will occur prior to the redevelopment of its current site, once both are completed and operational, there will inevitably be additional traffic congestion, noting that visitation to the SFM is predicted to double over 10 years (Concept DA EIS p122). It is concerning that the Government is proceeding with the SFM development in the absence of anything other than vague (and often conflicting) statements from the Premier, the Greater Sydney Commission, and Infrastructure NSW and its Master Plan consultants.

Most members of the Pyrmont community view with alarm the statements in the Review of Environmental Factors for the proposed 61-storey Ritz-Carlton hotel/apartment development, that it represents an “exemplar” for the revitalization of Pyrmont and that Pyrmont is to become “the Gateway to Sydney CBD” (The Premier). It is imperative that before the SFM development is given the green light by the Minister for Planning, the scale and nature of the developments to take place in the Blackwattle Bay Master Planning precinct be



clarified, given that the only clues to that future development are contained in the Study Requirement for Bays Market District (2017 p4) which refers to

- Provision of community facilities and services
- Business uses “to link with the existing digital economy hub in Ultimo and Pyrmont and the proposed innovation district at the former White Bay Power Station”
- If residential development is proposed the planners should “ensure a range of housing choices”

The precinct is also destined to be a popular destination as the waterfront is opened up to pedestrians, cyclists and users of the proposed “improved passive and active recreational opportunities” referred to in the Study Requirement document.

Recommendation 12: The cumulative impacts associated with the scale and zoning of the Blackwattle Bay Master Plan precinct must be determined before a final decision is made on the proposed new SFM.

Landscaping – We have examined the Proposal Design Report and found a list of species to be used in the landscaping of the public domain, including the Urban Park and the Local Plaza (Proposal Design Report pp 207-208). We note that whilst natives predominate, the list includes some exotic species. We strongly recommend that all planting should be native species, preferably local species which are both attractive and provide habitat for local animals and birds. It should be noted that volunteers from Pyrmont Ultimo Landcare Inc have expanded the extent of the original wildlife corridor established in the nearby Quarry Master Drive precinct in Pyrmont, including on land within the Wentworth Park Light Rail station corridor which is identified as a project supported by the City of Sydney in its Urban Ecology Strategic Action Plan. The White Bay Community Native Nursery in Annandale has compiled a list of local native plant species to which the landscape consultants can refer.

Recommendation 13: Local native plant species should be used in landscaping the Urban Park and Local Plaza, to provide habitat for native birds and animals.

We strongly support the biofiltration of stormwater for use in the public domain (EIS p31), but, in this era of global warming and extended periods of drought, urge increasing water storage capacity to take account of the impacts of climate change. It is noted that the storage tank provided for nearby Waterfront Park in Pyrmont has insufficient capacity to maintain water supply for the plants and lawn during prolonged dry periods.



Recommendation 14: Ensure that stormwater storage capacity is sufficient to keep plants alive during prolonged periods of drought.

Public Access – We note the measures proposed to enhance public access and spaces (EIS p43) in particular the provision of “logical, clear and direct connections into the surrounding public transport network”. Given that the current nearest bus services (389 and 501) are some distance away in Harris Street and the Minister for Transport has rejected our calls for a bus service to serve the Sydney Fish Markets, it is important to provide clear signage at current bus stops at the corner of Harris Street and Pyrmont Bridge Road, to direct visitors to the new SFM. At present, local residents and workers and bus drivers have to steer bewildered visitors to the facility, in the absence of such signs. It is also important to provide signs from the new SFM to other key tourist destinations eg The Star Casino, Maritime Museum and Darling Harbour, as well as to public transport stops.

Recommendation 15: Provide clear directional signage from key public transport stops to the new SFM, and from the new SFM to key tourist destinations in Pyrmont and Darling Harbour.

There is much to commend in this Concept DA including

- the opening of view corridors to the East and West of the building
- the provision of enhanced public spaces including the Waterfront Promenade, the Urban Park and the Local Plaza
- the proposed ESD measures proposed to achieve a 5-star rating and a 30% reduction target in greenhouse gas emissions (EIS p171)

However, before we can fully endorse the proposal, we would expect actions to be taken to address our concerns.

Yours sincerely,

Elizabeth Elenius, Convenor



Summary of Recommendations

Recommendation 1: Consideration of the DA for Stage 2 Works should not be undertaken until the Blackwattle Bay Master Plan has been approved.

Recommendation 2: Ensure traffic lights at Wentworth Park Road indicate the ability of drivers to make a U-turn if travelling from the East along Pyrmont Bridge Road.

Recommendation 3: The proponent to consult community representatives, together with representatives of RMS and the Department of Transport, and the consultants preparing the Blackwattle Bay Master Plan, to consider improvements to the road system in the vicinity of the proposed new SFM prior to any work commencing on the site.

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