

23 November, 2021

David Glasgow,  
Planning and Assessment,  
Department of Planning, Industry and Environment,  
Locked Bag 5022,  
PARRAMATTA NSW 2124

Dear Mr Glasgow,

Cockle Bay Park Redevelopment – SSD-9978934

Pyrmont Action Inc. has participated in a number of community consultations, the most recent on 25 August, 2021, and made submissions on the initial and Amended Concept Proposals (1 February, 2017 and 4 December, 2017); and on the Response to Submissions – Cockle Bay Wharf (SSD 7684) on 30 July, 2018. We note that the proposal outlined in this SSD Application has been required to comply with Concept Approvals determined by the Independent Planning Commission (IPC) on 13 May, 2019. We comment, as follows:

1. **Bulk and Height** – As these parameters have been set by the IPC, and the proposal conforms to them, all we can do is repeat our concerns about the impacts - view loss, overshadowing and the towers' domination of its waterfront location - noting that its height has, as foreshadowed, been cited as a precedent for extending height limits on developments proposed for the Pyrmont Peninsula, including the Harbourside redevelopment. As an SSD in Darling Harbour, there are no rules governing what is built, but it is hard to accept that the built form is "human scale designed for the City" when viewing Fig 23 (EIS p35) in which the structures tower over the buildings behind them.
2. **Podium** – The EIS (p67) states that "the project will maintain the existing pedestrian thoroughfare along the harbour" but it is unclear whether that means the foreshore walkway will be the same width as currently. We strongly recommend that the current width of the foreshore pedestrian thoroughfare be retained.

We generally approve of the design of the podium, and its proposed uses which will provide improved public access and stimulate activation of both the waterfront and the open walkways and generous public domain.

3. **Visual Impact and Loss of Views** – We note that residents of the Astoria residential building will lose views to the harbour and experience a negative visual impact when the towers are completed, although not quite as severe when compared with the Stage 1 Concept design. We also note that the visual impact of the towers from the Western side of the bay is not considered in the EIS. The buildings will block views to parts of the CBD from 50 Murray Street, Pyrmont and will have a significant visual impact on its residents.



4. **Overshadowing and Reflectivity** – The EIS does not appear to evaluate overshadowing of either the bay itself or buildings on the Western side of the bay. Fig 82 (p93) only depicts shadowing in the vicinity of Tumbalong Park. Other areas investigated are Sydney Square, Future Town Hall Square and the Cockle Bay Waterfront promenade. We have asked for shadow diagrams for areas to the W of the proposed development, without success. In the absence of such data, we can only surmise that there will be overshadowing of both the water and residential buildings to the W in the mornings but are unable to establish its severity. This will be matched by similar overshadowing of the water and the Cockle Bay precinct in the afternoons by the proposed Harbourside redevelopment, possibly leaving the harbour free of shadow in midday. We ask that the proponents be asked to provide detailed shadow diagrams for the Western side of the bay in order that DPIE, and the general public, can ascertain the full impact of overshadowing on areas to the West of the Cockle Bay Precinct.

In discussing the impact of reflectivity, the EIS only looked at Union Street and Darling Street from street level, and from the driver's perspective. The study confirmed that there would be an impact but postulated that drivers and pedestrians could make adjustments accordingly. There was no consideration of the impact of glare from the facades of the building on residents living opposite requiring the drawing of curtains or blinds in the late afternoons. We ask that the impact of glare from the Cockle Bay tower facades be examined from various levels of buildings above street level and the results be made public. These impacts should be taken into account by DPIE assessors.

5. **Traffic, Transport and Parking** – We note no parking will be provided within the development, in line with current City of Sydney policies which are designed to deter vehicles from entering the City. We do not agree with the statements in the EIS (p31) that there are good transport options for the site, with rail connections being located up to 1.2kms away, including those currently on the drawing board for the Metro. Ferry wharves are also located between 400m and 700 metres away with limited bus services approximately 5 minutes' walk away in Druiitt Street. The plan relies on people being able to walk or cycle to the site, but little account appears to be given to access for those with mobility problems.

We have long sought the establishment of a separate cycle lane on the Pyrmont Bridge, noting that few cyclists appear to follow the speed limit and that a number of serious accidents have occurred involving cyclists and pedestrians. We recommend that, as more large-scale developments are proposed for Darling Harbour, the Government agency responsible for the bridge be required to install a dedicated cycle lane on Pyrmont Bridge to improve pedestrian safety, including for those who will access Cockle Bay Park when completed.

6. **Pedestrian Linkages** – We applaud the provision of pedestrian pathways to and through the park (Fig 64). Walking to, through and around the current Cockle Bay precinct is extremely difficult. We welcome the pedestrian linkages to Druiitt



Street, Sussex Street, Market Street and the Pymont Bridge, as well as the main public park link, noting that these linkages will generally be free from use by cyclists thus improving pedestrian safety.

7. **Wayfinding** – Darling Harbour remains notoriously difficult to navigate, with few signs directing visitors to key destinations beyond the precinct, including key streets, public transport stops, tourist destinations eg the Sydney Fish Markets, QVB, Pymont, Ultimo, Glebe. It is vital that a wayfinding and signage strategy be developed in partnership with those who live and work in adjacent precincts to ensure that key destinations both within the Cockle Bay Park precinct, and beyond are identified and clearly signposted.
8. **Public Parks** – We support the establishment of two publicly accessible parks over the Western Distributor, including the reconstruction of Crescent Garden. We regret the loss of 95 existing trees and recommend that they be replaced with at least 95 new trees capable of providing shade and habitat. We recommend that the use of hard surfaces eg concrete be kept to a minimum, that natural grass, not artificial turf be used and that local native species of trees, shrubs, grasses and climbers be planted in preference to exotic species. We support the use of Crescent Garden for events, provided that such use does not detract from the amenity of residents in nearby Astoria Towers, noting that there is to be 24/7 access to these parks. Amplified music should not be permitted after 10pm as loud noise will bounce off the surrounding hard wall surfaces.
9. **Security** – In our last consultation, we were advised that the owners of Cockle Bay Park would own all public spaces within the site and that private security would be provided to ensure public areas are regularly patrolled to curb anti-social behaviour. We recommend the installation of CCTV directed to public areas in order to monitor these spaces, and to provide quick action by Security staff, if required; also ensure good levels of lighting in public spaces.
10. **Sustainability** – We note and commend the measures to be taken to achieve and exceed a 5.5 star energy rating, including the buildings' all-electric operation (no use of gas) with the installation of solar panels to generate renewable power offsets. Whilst there will be no on-site parking for vehicles, we recommend the installation of one 24/7 publicly accessible fast EV charging station to serve not only visiting vehicles, but vehicles used by those who live and work in and near the precinct. We also recommend installation of sensors within the buildings which can turn off electric lighting when people are not present. We support the measures outlined for the harvesting, storage and recycling of rainwater to supplement tower cooling demands and for use in the parks and gardens. Maximum use of green walls in the podium areas is also supported.
11. **Construction** – Pymont Action has been represented on Community Consultative Committees established to ensure construction issues can be discussed, and solutions sought. We ask that a CCC be established and representatives invited from those who may be impacted in Pymont and the CBD.





We appreciate the opportunity to comment on this project and ask that our recommendations be taken into account in the assessment of this DA.

Yours sincerely,

Elizabeth Elenius, Convenor

