

**City of Sydney**

ABN 22 636 550 790

GPO Box 1591 Sydney NSW 2001 Australia

Town Hall House 456 Kent Street Sydney NSW 2000 Australia

Phone +61 2 9265 9333 Fax +61 2 9265 9222 TTY +61 2 9265 9276

council@cityofsydney.nsw.gov.au www.cityofsydney.nsw.gov.au



29 October 2010

Our Ref: R/2010/99/1

Your Ref: MP10\_0060

Director, Government Land and Social Projects  
Department of Planning  
GPO Box 39  
Sydney NSW 2001

Attention: Amy Ravitz-Williams

Dear Amy

**Sydney Fish Markets 56-60 Pyrmont Bridge Road, Pyrmont**

I refer to your request for comments on the current Part 3A Major Project application for the redevelopment of the Sydney Fish Markets (SFM) site.

The City generally supports a redevelopment of the site that will improve its appearance, improve pedestrian access and 'way finding' and the site's integration with the surrounding public domain. It is noted that the City is disappointed that the current application does not include any proposals to upgrade or redevelop the auction hall building within the south east corner of the site. This hall presents as a blank wall to a large section of street frontage within Pyrmont Bridge Road and detracts from the public domain. The City encourages the operators of the Fish Markets to incorporate the redevelopment of the auction hall as part of an endorsed master plan for the site.

In conjunction with the above matters, a number of issues have been identified, that primarily pertain to building design, integration with the public domain and 'way finding'. Many of these issues were raised at the Director General Requirements stage but are still outstanding. Detailed conditions will not be provided until these issues are resolved as they are likely to require design amendments. These issues are detailed below:

**Urban Design**

Views / Orientation

- The design and layout of the redevelopment appears to focus primarily on the views and outlook towards Blackwattle Bay to the west. Little attention has been given to integrating the site with the public domain or development to the east of the site.
- The height and footprint of the new building will impact upon views looking west from intersection of Pyrmont Bridge Road and Bank Street and from Bulwarra Street. The views from the Pyrmont peninsula across to Blackwattle Cove and

*city of villages*

Glebe Point will also be affected and replaced with a carpark and concrete ramping. This is inconsistent with the master plan objectives of maintaining existing prominent views.

### Building Design

- The eastern elevation of the new main building will present a plain blank wall to the site's main public frontage along Jones Street. This will add little to activating street frontage which is presently unappealing and inhospitable.
- It is recommended that this elevation to the street be redesigned to better activate the Street or at the least incorporate glazing or architectural features or detailing to increase the visibility of internal activity or better design of the building from the street.
- Existing trees on the eastern elevation are well established and form part of the streetscape and should be retained where possible (this is discussed further in the public domain comments). At the very least substantial landscaping and new trees should be provided to screen the vehicle ramps and rooftop car parking, particularly as the car parking will be exposed from the elevated freeway.

### Access and Facilities for Persons with Disabilities

- Details about compliance with access requirements for publicly accessible areas and facilities for people with a disability in accordance with the Building Code of Australia and the City of Sydney Access Policy 2007.

### **Traffic and Bicycle Parking / Movements**

#### Cycleway integration and facilities

- The application appears to include upgrades to cycleway and pedestrian routes around the site but does not adequately address conflicts between vehicles and pedestrian / cyclists at the Bank and Miller Street crossing. The proposal does not adequately address the master plan objectives in this regard.
- All installations of new cycleways require approval of the City's cycleway design team and referral to the Sydney Traffic Committee.
- Consideration should be given to the designated routes shown within the City of Sydney Cycle Strategy and Action Plan 2007 – 2017 and the provision of sufficient width for a separated pedestrian and cycle route along the southern and eastern perimeter of the site in order to provide safe access.
- Consideration is to be given to how the links can be upgraded to improve the pedestrian and cycle experience accessing the site and routes through the site moving east to west and links with the surrounding public domain.
- The levels of cycle parking proposed as part of the development is lower than the requirements set out in the NSW Planning Guidelines to Walking and Cycling. The Guidelines require between 146 and 287 spaces, the proposal only includes 122 spaces.
- There is no mention of any end trip facilities for staff cycling to the site. The guidelines recommend that for approximately 460 staff 1 locker per 3 bicycle

racks should be provided and a total of 8 showers (4 male and 4 female) and 2 changing rooms (1 male and 1 female).

### Traffic Impacts

- Jones Street is a City owned road adjacent to the SFM site on its northern boundary. The application relies on a yet to be confirmed time limited lease with The City. The arrangements being proposed have the effect of making the public road private with the installation of toll gates. This arrangement can not be supported until the lease is confirmed.
- Similar concerns are raised with the proposed roundabout which is to be constructed half on The City's land and half on the SFM site.
- If the road is to remain public, concern is raised with the proposed arrangement of semitrailers serving the site reversing into the loading docks from the public road. This is not something that would be supported.
- Any proposed changes to the traffic or parking arrangements will need approval of the City and referral to the Sydney Traffic Committee. Transport NSW should also be consulted in light of potential bus operations through this intersection and in the vicinity of the site.
- It is unclear from the submitted information if the car park has potential for use as all day commuter car parking. This should be discouraged with an appropriately structured charging system.

### Construction Traffic Management Plan (CTMP)

- It is recommended that the CTMP be revised to include an Internal Access Management Plan and a Construction Pedestrian Management Plan. The final plan will require approval from the City's Construction Regulations Unit.
- Any changes to the signalling will need approval from the RTA.

### **Public Domain**

#### Tree Removal

- A large number of trees are proposed to be removed along the site boundary adjacent to the Western Distributor. Therefore, Building A should be setback a minimum of three (3) metres to allow for replacement tree planting to replace the loss of tree coverage. Palms would be suitable.

<b>Trees for Retention</b>			
<b>Tree No:</b>	<b>Botanical Name</b>	<b>Dimension (metres)</b>	<b>Setback Required (metres)</b>
9, 10, 11, 12, 13	<i>Ficus microcarpa</i> var. <i>hillii</i> (Hill's Weeping Fig)	10 x 12m	4.2m
23	<i>Ficus microcarpa</i> var. <i>hillii</i> (Hill's Weeping	14 x 25m	10.2m

	Fig)		
24, 25	<i>Ficus microcarpa</i> var. <i>hillii</i> (Hill's Weeping Fig)	7 x 7m	2.5m
26, 27	<i>Eucalyptus saligna</i> (Sydney Blue Gum)	14 x 13m	8.4m
28, 29, 30	<i>Phoenix canariensis</i> (Canary Is. Date Palm)	8 x 7m	2.5m
31, 32, 33	<i>Phoenix canariensis</i> (Canary Is. Date Palm)	4 x 7m	2.5m

- Trees numbered 9, 10, 11, 12 and 13 (using the numbering provided in the Arborist Report) are proposed for retention. The City supports their retention and the trees must be protected during all stages of development on site. Tree protection measures should be prepared by a qualified arborist and submitted to the City for approval.
- Six palm trees numbered 28, 29, 30, 31, 32 and 33 were transplanted to site approximately 15 years ago and are proposed for transplanting as part of the development. The palms should be considered for relocation within the site, possibly along the Bank Street frontage to replace the large number of trees being removed and to help soften the building frontage.
- Tree numbered 23 is proposed for removal, however, it is recommended that it be retained. It is a mature and healthy tree which already provides screening of the site from the Western Distributor. It is noted the applicant's Arborist identifies this tree as the best specimen on site and therefore the design should be modified to allow its retention. A minimum setback is required of 3 metres. The plans must be amended to provide these setbacks.
- Trees numbered 24 and 25 are both recommended by the Arborist as being suitable for transplanting and this should be considered as part of the development.
- Trees numbered 26 and 27 are proposed for removal; however, it is recommended that these trees be retained. The two trees are large and healthy trees providing significant amenity to the site. A minimum setback of 8 metres is required to adequately protect the trees. The plans must be amended to provide these setbacks and any ground treatments within Tree Protection Zone should be above existing grade.

Trees for Removal			
Tree No:	Botanical Name	Dimension (metres)	Health / Condition
16, 17, 18	<i>Ficus microcarpa</i> var. <i>hillii</i> (Hill's Weeping Fig)	10 x 12m	Poor
19, 20, 21	<i>Ficus microcarpa</i> var. <i>hillii</i> (Hill's Weeping Fig)	14 x 20m	Fair

- Trees numbered 15, 16, 18 and 19 are in poor condition. Recent pruning which appears to have been completed without consent has resulted in significant modification of tree canopy structure.
- Tree numbered 17 is structurally unsound and should be removed regardless of the development.

- Tree numbered 20 and 21 are in fair condition however large woody structural roots are exposed above the existing asphalt footpath and therefore it is unlikely the trees will be safely retained considering the scale of the proposed works.

#### Tree Management Plan

- To ensure all trees identified for retention are safely retained and protected a Tree Management Plan must be prepared by a qualified Consultant Arborist, who holds the Diploma in Horticulture (Arboriculture), Level 5 under the Australian Qualification
- Framework; to ensure the necessary tree protection measures are implemented during all stages of development. Please note, all issues regarding trees must be addressed and resolved prior to the commencement of works. The Tree Management Plan must be submitted to the City for approval to ensure all trees recommended for retention are protected in accordance with AS 4970 Protection of Trees on Development Sites.
- The Tree Management Plan should include the following;
  - Review the architectural and landscape drawings and assess the potential impact of the proposed development on existing trees to be retained, including assessment of any proposed incursions to the canopy and/or root zone – including as part of the construction methodology;
  - Recommend modifications to the design or construction methods where appropriate to minimise adverse impact on trees considered worthy of preservation including recommended setbacks or other measures to avoid adverse impact.
  - Prepare a plan showing the trees to be removed and retained together with their respective identification number based on the site survey. Trees to be removed shall be indicated with a bold dashed line.
  - A plan of management for transplantation must be included regarding existing palms numbered 28 – 33 and fig trees numbered 24.
  - Information on the Arborist's involvement during the works is also required.
- Final detailed conditions will be provided once amended plans are submitted.

#### Ownership of Public Domain Works

- There are several areas of uncertainty concerning works to the private and public domain. It is unclear who will be the end owner responsible for the proposed new streets, parking areas on private land, parks and the harbour side public precinct.
- If the City is to take ownership of any of these areas then the City standards for design and construction must be adhered to. Delineation of site boundaries to define public domain and private land will be required.

- Arrangements and responsibility for maintenance of these increased areas of landscaping must be discussed further with the City before the proposal can be endorsed. It is likely that the City will likely require that these areas are maintained by the development as part of any future lease arrangement.

#### Landscaping works

- Further consideration should be given to the size, layout, species and irrigation requirements in the soft landscaping areas shown along Jones and Bank Streets.
- The introduction of soft landscaping throughout the site including shade trees to soften the large areas of 'hardscape' adjacent to the Pedestrian Arrival Forecourt, Waterfront Promenade and pedestrian paved areas is required.
- Consideration should be given to the provision of a shaded secure children's play or recreation area adjacent to the Main Lawn or Urban Plaza area.

#### Public access along the foreshore

- The 6m wide timber boardwalk and 3.5m wide paved promenade is generally acceptable, although it is noted that at the southern end it is proposed to be used for shared circulation and greater consideration should be given to resolving conflicts between cyclists and pedestrians crossings at key access points.
- If the public foreshore area is to be dedicated to the City, then City standards for design must be adhered to.
- Information as to maintenance, dedication of land, register of easement on title or other arrangements will need to be submitted to The City for approval.

#### Waterfront and Public Safety

- Details will need to be provided about waterfront safety measures: stair access to the water's edge, buoys and similar.
- Details on lighting to publicly accessible areas in accordance with Australian and City of Sydney Standards are to be submitted.

#### Links to the Surrounding Public Domain

- The submitted drawings show public domain changes to the boundaries on the eastern, northern and western sides of the development. No information is provided about upgrades to the public domain along Pyrmont Bridge Road on the southern boundary and no detailed information is provided regarding pedestrian crossings.
- Details about changes to the surrounding street network to enable pedestrian and cycle access to the site, including details on the extent of work proposed outside the boundary of the site and changes to the traffic signals to Pyrmont Bridge Road and Bank Street (2 locations) are to be submitted. Evidence of consultation with the RTA on proposed changes to the signals should be submitted.

- Details about how public domain works will be resolved to prevent conflict between vehicles and pedestrians / cyclists entering and leaving the site should be submitted.
- A public domain plan will be required detailing the proposed integration and links with the surrounding area, including links to Wentworth Park, the light rail stop on Bank Street, Jacksons Landing development and the greater Pyrmont suburb.
- The public domain and publicly accessible areas are to be upgraded in accordance with the City of Sydney's Public Domain Manual, Sydney Streets Design Code, and Sydney Streets Lighting Policy. Details of compliance with the City's policies are to be included.

### ***Impact upon Potential Non- Indigenous and Indigenous Archaeology***

To effectively manage any impacts on non indigenous and aboriginal archaeological potential of the area in accordance with the NSW Heritage Act 1977 and National Parks and Wildlife Act 1974, respectively, the following is recommended:

- A program of archaeological investigation should be undertaken and an excavation director appointed to manage the program.
- A Research Design and Management Strategy report needs to be written to guide this investigation. This report needs to draw on a range of Heritage Council guidelines.
- Testing of areas of impact within the study area should be carried out to determine the nature and depth of archaeological remains and to assist the development of an archaeological management strategy.
- Based on the archaeological integrity of the remains, a program of archaeological salvage and recording will be required. Recording and salvage would include sampling sections of the site, such as:
  - Recording any evidence of 19th-century maritime infrastructure, stores and reclamation including features such as drains and culverts, jetties piers sea walls and piling and evidence of early industrial buildings particularly those associated with early industry including the timber industry, shipwrights workshops, sandstone quarrying, ironworks, oil works and the cooperage.
  - The nature of the area's reclamation fills should be investigated throughout the study area.
  - Evidence for the early topography and natural landform and how this was modified through time.
  - Subsurface archaeological deposits containing Aboriginal artefact scatters and/or middens may be located within the portion near the original shoreline.
- The archaeological sampling and recording needs to be undertaken according to Heritage Branch, Department of Planning guidelines and best practice archaeological methodologies. The program of Aboriginal sub-surface testing should be undertaken in partnership with the Metropolitan Local Aboriginal Land Council.

- If any Aboriginal “objects” (as defined under the *National Parks and Wildlife Act 1974*) are located during the course of the testing program, the Metropolitan Local Aboriginal Land Council should apply for a Care Agreement with the Department of Environment, Climate Change and Water to enable them to keep the objects.
- A repository for any artefacts recovered should be kept on site.
- An interpretation plan is to be developed for the site, and the results of the archaeological program, with all its types of evidence, needs to be incorporated into the interpretation plan. The archaeologists need to have a central role in the development of ideas and themes and interpretative concepts. Interpretation of the Aboriginal history of the site should be included in the redevelopment proposals.

### ***Contamination***

- The Remediation Action Plan (RAP) prepared by Environmental Investigation Services dated August 2010 states that the site can be made suitable provided the management measures outlined in the RAP are implemented. However the RAP has not been peer reviewed by a NSW EPA accredited site auditor and does not include a statement issued by that auditor certifying that the RAP is practical and the site will be suitable after remediation for the proposed use.
- Therefore, the proposal in its current form cannot be supported until a statement by a NSW EPA accredited site auditor certifying that the RAP is practical and that the site will be suitable after being remediated in accordance with the requirements of the RAP is supplied to the City for further comment and found to be satisfactory as required by SEPP55.

### ***Tavern and food premises***

- Limited details have been provided for the fitout and use of the proposed tavern (licensed premises) and other food premises. It is recommended that each tenancy be subject to a separate development application and that a consistent operation and signage strategy be formed to guide applications.

If you would like to speak to a Council officer, please contact **Jai Reid** on 9265 9677 or email [jreid@cityofsydney.nsw.gov.au](mailto:jreid@cityofsydney.nsw.gov.au)

Yours sincerely,



Graham Jahn LFRAIA Hon AIA Hon FPIA Hon FNZIA  
**Director City Planning and Regulatory Services**