

11 November 2019

Planning and Assessment
Department of Planning, Industry and Environment
GPO Box 39,
Sydney NSW 2001

Attention: Director – Key Sites Assessment

RE: SSD-8924-The new Sydney Fish Markets Concept and Stage 1
SSD-8925-The new Sydney Fish Markets Stage 2

Dear Sir/Madam

We write to object to both of the above development applications for the new Sydney Fish Markets (SFM) on the following grounds:

- **The proposed developments bulk and scale is uncharacteristic of the Glebe locality and surrounding residential development.**

The scale of the proposed development is significant within the context of the locality. At 195m long by 95m wide with a height of 21-23m or 7-8 storeys high, nearly double the footprint of the existing SFM there is no other comparable development in the vicinity of the site. The nearest comparable structure would be the ICC more than 0.5 kilometres away in Darling Harbour.

This scale of development is obviously completely out of character with surrounding development, particularly in the Glebe area that is predominantly fine grained 2-3 storey residential.

The EIS identifies the height of the fig trees along the edge of the park and the existing concrete batching plant as informing the height of the proposed development. The comparison is hardly valid as the proposed development has a footprint many times greater in area than the batching plant structures and the fig trees are a diaphanous, not a glass curtain wall, concrete and steel structure.

The EIS acknowledges that the proposal is larger than most other buildings in the area. The justification that the scale of the proposed development is reduced by the transparency and modulation of the facades is specious. Glass is not completely transparent, largely dependent on internal and external light conditions.

On southern elevations glass tends to reflect light rather than be transparent so there would be a lack of transparency along the Bridge Road frontage where there is a fairly consistent glass curtain wall façade around 16.5m or over 5 storeys high.

Whilst much is made of it's architectural merits, the wave form roof is at some 18,500 sq.m of continuous envelope a significant visual element in it's own right and is uncharacteristic of the roof forms evident in the locality. Looming over the building beneath the roof has a relatively deep fascia that contributes to the bulk of the development rather than reducing it. This once again would be particularly evident at street level along Bridge Road.

- **The site location is unsuitable to the scale of the proposed development.**

The scale of the proposed development will require building over some 18,000 sq.m of the waters of Blackwattle Bay, more than doubling the size of the existing developed area of the site.

This is inconsistent with the Harbour SREP and notably *Reclamation works* are prohibited under the Harbour SREP. The proposed reclamation required to increase the site area will have a significant impact on the marine ecology and visual qualities of Blackwattle Bay and degrade the natural asset of Sydney Harbour foreshore.

Building over the harbour will disturb existing toxic sediments including Arsenic, Mercury, Lead, Copper, Cadmium, Nickel and Zinc as well as petroleum hydrocarbons, organophosphate pesticides, herbicides and asbestos which are all present in high levels with the resulting detrimental impact on marine life within Blackwattle Bay and potential health impacts on local residents and the students at the adjacent high school.

- **The proposed development will contribute to significant additional overshadowing of Wentworth Park.**

At 3pm on 21 June the proposed development will contribute to overshadowing around 30% of the park between Bridge Road and the railway viaduct. By 3.30pm this will increase to nearly 50% and by 4pm nearly 70%.

Low angle winter afternoon sunlight currently penetrates through and under the fig trees providing filtered sun light rather than the uniform overshadowing resulting from the proposed development.

The area of increased overshadowing contains a football pitch used extensively over the winter months for recreational sport. The additional overshadowing will impact on the players, spectators and the maintenance of the pitch.

- **The proposal fails to maintain or enhance the visual connection or provide a physical connection between Wentworth Park and Blackwattle Bay.**

The proposal is not consistent with one of the key objectives of the planning policies relevant to the site, to create, retain and enhance views and links between Wentworth Park and the foreshores of Blackwattle Bay.

The visual connection between the park and the bay will be lost.

Vistas from the bay to the avenue of fig trees along Bridge Road would be screened behind a 21-23m high view barrier running the entire length of the park, as will any potential visual connection from the park to the harbour.

The EIS claims that the proposal will open up new "view corridors" for the park at the western and eastern ends. Arguably these are existing view corridors and relate more to the Wentworth Park Road and Wattle Street intersections with Bridge Road rather than the park itself as the EIS views and vistas analysis clearly illustrates. The proposed development places greater significance on providing view corridors for traffic intersections over those from the park.

There is no solution offered to provide for a better physical connection between the park and the harbour foreshore other than an additional pedestrian road crossing at the Wentworth Park Road intersection. In this respect the proposal would have benefited from an elevated pedestrian promenade over Bridge Road.

- **The proposal fails to provide a continuous level promenade along the harbour foreshore for pedestrians, cyclists and people with disabilities.**

Pedestrians wishing to continue along the waters edge can only do so via a series of stepped walkways leading onto an elevated terrace lined with retail outlets. There is no choice to this path other than along Bridge Road.

Pedestrians are forced into a retail area particularly at its northwestern end. Here access is pinched into a terrace area some 10m wide which appears to be largely devoted to outdoor seating serving the adjacent retail areas.

The promenade area would effectively operate similar to a shopping centre food court, not a harbor foreshore public space.

It is assumed cyclists are required to use Bridge Road and similarly, in contravention of the Disability Discrimination Act, those people with disabilities have to go in search of lifts or again are forced along Bridge Road. This is not providing equitable access on the same terms as people without a disability.

- **The proposal will have a negative impact on parking availability and traffic congestion within the residential areas of Glebe.**

The proposal asserts that any overflow demand for on street parking will be nullified by management plans. Those plans cannot guarantee that people driving to the SFM will not park in the surrounding residential streets. There will be a significant motivation to do so as the SFM will be in much closer proximity to the Glebe residential area.

Traffic modeling confirms there will be at least 400 additional vehicles utilising Bridge Road to enter the proposed development during the week day peak period of 5pm to 7pm. This is a 100% increase on current levels and will inevitably result in an unacceptable increase of traffic congestion within Glebe.

Yours faithfully

Kirsten Smith

A handwritten signature in black ink, appearing to read 'Kirsten Smith', written in a cursive style.