

I wish to raise the following concerns in response to the exhibition of the SSDA for the new Sydney Fish Markets – Concept Proposal and Stage 1 Works and “Stage 2”. I’m deeply disappointed in the process and the lack of transparency about what is being planned and the assessment of likely impacts.

Process

I’m concerned that the process for identifying the location, size of the fish markets and its integration with the rest of the city is occurring in an uncoordinated manner, with superficial consideration being given to key concerns.

When the NSW Government initially indicated that a new Fish Markets was to be considered it was to be as an integral part of a comprehensive vision for the entire Bay’s Precinct. Urban Growth previously stated that “The Bays Market District masterplan will cover 9.2ha of land, including: government and privately-owned land along Bank Street in Pyrmont, the current Sydney Fish Market site, integration with the new Sydney Fish Market, the first stage of the Bays Waterfront Promenade, connections to Wentworth Park and water uses in Blackwattle Bay. We expect to have the final masterplan for the Bays Market District in late 2017 to early 2018”. This masterplan was never released and this approach, to provide transparent comprehensive consideration of the issues and to develop a shared vision for this area appears to have been abandoned. This is not best practice as premature development of the Fishmarket creates the risk that future issues (such as traffic congestion along Bridge Road) will not be able to be addressed.

The decision to advertise both the Concept Proposal and Stage 1 Works and Stage 2 at the same time, especially given the absence of a Masterplan for the area, is also not desirable. Asking for comment on the “Concept Proposal” at the same time as seeking comment on a detailed “Stage 2” appears disingenuous as there seems little likelihood that comments on the “Concept” will inform the development of “Stage 2”. It is also confusing and overwhelming for the general public as both applications contain a great deal of detailed information, all of which must be reviewed in order to prepare reasoned feedback. There is a risk that the general community may not understand that a submission on the “Concept Proposal” may not be counted as a submission on the detailed “Stage 2”. This could allow the government to claim that “only x responses to the Stage 2 proposal were negative”. Given the confusion created by the way that that proposals have been advertised simultaneously this would not be accurate. It is recommended that a submission for either part be counted as commentary on both proposals.

The proposed development is substantially larger than the current markets and by moving the markets onto the water it creates the likelihood than an even bigger development will occur on the current Fishmarket site. Approval of the Concept Proposal and Stage 1 and Stage 2 works is therefore premature given the absence of an approved Masterplan for this section of the Bay’s Precinct which would consider the impact of both developments in the wider context.

Access and Movement

The traffic report states “The road network impacts arising from the development of the wider area, including the redevelopment of the existing fish market site, will be detailed in a separate study as part of the rezoning application for the Blackwattle Bay district.” This is not a comprehensive way of assessing the impacts of this development and other developments in the Bays Market District. Effective strategic planning requires an understanding of the cumulative impacts of the development of the area before approvals are granted, not after.

The traffic study also states that “Improved public transport to the site, particularly with the advent of a station at the Bays Precinct as part of Sydney Metro West and improved bus services to support Blackwattle Bay” will assist in mitigating the impact of increasing the size of the development substantially without providing additional parking.

Given the proposed Bays Precinct Metro Station is approximately 3km away and currently requires pedestrians to cross the Anzac Bridge, it would take between 45 minutes and an hour to walk to the station. It takes approximately 30 minutes to walk from Town Hall station to the Fish Markets so this new metro station will provide little benefit. It is also worth remembering that at its core the Fish Markets is a place to buy fresh fish and having bought this raw fish few people want to walk long distances in the hot sun!

A new Metro station at Pyrmont would improve access to the markets but this station and its location has not been confirmed and so it would be premature to assume additional transport capacity to this location in the absence of announced and funded transport improvements.

An improved bus service along Bridge Road, linking Camperdown with Pyrmont, would be highly desirable but again the route and frequency of an “improved bus service” are not quantified in the proposal, but only implied.

Also of concern is that the Traffic Report states “It should be noted however that the current masterplan for Blackwattle Bay envisages largely residential uses (with low rates of on-site car parking) close to public transport and employment areas. Therefore the volume of traffic generated by future development will be modest and potentially lower than that currently generated by the existing operations”. This fails to recognise that the “existing operations” are being replaced by a much larger development to the south with insufficient parking. It is also similar to the approach taken for Barangaroo and yet subsequent approvals have increased the amount of parking provided for the development (responding to market demand) and few would argue that traffic impacts at Barangaroo are a great success.

The traffic report also states that “On-site parking for staff and visitors will be charged at market rates in line with those at other nearby commercial car parks. Reducing the number of staff (both Sydney Fish Market and tenant staff) parking on site by approximately 50% would provide sufficient capacity within the on-site car park to accommodate demand on weekdays and weekends” and would “change the travel demand profile compared to that of the existing site”. The report also indicates that “Increases in the overall retail floor space will result in higher overall visitation numbers, however these will be more distributed across the day (particularly in the evening)”. What the report fails to address is the possibility that charging market rates at the Fishmarket will encourage visitors and staff to park in surrounding streets, especially on weekends and evenings, as the current local 2-hour limit only operates Mon-Fri and stops at 6pm. The report doesn’t seem to recognise that those accessing the retail and dining (which generates longer trips) are more likely to seek cheaper options in surrounding streets than the current situation, where 15min parking, which is long enough to buy fish, is free.

On a positive note, setting back from Bridge Road to accommodate the active travel for commuters from the Inner West into the CBD is commended, although the quality and safety of cyclists and pedestrians will be critical and it is unclear if loading and tourist bus access will compromise the safety and amenity along this key connecting route.

Built Form

Built Form and Design Analysis states that “the height of significant trees in Wentworth Park informed the height of the proposed building envelope with the roof edge seeking to relate to the tree line and not exceed the height of the existing cement batch plant (28.7 metres high) as a reference datum. This also reduces the visual and shadowing impacts on Wentworth Park”. The plans state the existing Morton Bay Fig Trees have an RL of 25.48. This defies logic. While there are a couple of taller eucalypts in this area the existing Morton Bay Fig Trees do not look to be taller than about 12-15m not 25m in height. If this is truly an error, it would mean the impact of the proposed development is substantially greater than is stated in the submission.

Built Form and Design Analysis in the Concept Design Report states “The built forms to the west of Wentworth Park (Glebe) are made up of small lots with majority of terrace houses at 1 to 2 storeys high with some more recent multi-storey apartment developments. The built form to the east of Wentworth Park (Ultimo and Pyrmont) consist of buildings with larger footprints, mainly in the 3 to 12 storey height range. The proposed development will consist of 3 levels above ground”. While describing the proposed development as “3 storeys” is technically correct, with a wharf level of between RL3.3 to RL4.3 this makes the building 15 to 24m high, which is similar in scale to a 7 storey residential building, not a 3 storey building. Additionally, using the existing tower element on a cement works (which is being demolished) and an industrial use, to justify the roof height of a very large building is tenuous especially as it ignores the smaller residential scale developments that will remain in the local area.

Built Form and Design Analysis also states “Although the view will be dominated by the built form of the market, it will be of a more open and activated nature than the monolithic structures currently dominating the view. It is anticipated that a moderate visual impact will occur due to the loss of views to Wentworth Park. However, as the current view is dominated by the cement works, the addition of the built form of the market will not greatly alter the dominance of built form in the current view.” This is disputed. Given the height, length and lack of transparency of the proposed development, especially along Bridge Road and along the waterfront, the proposed development will be a much more monolithic and dominant built form.

Creating a successful built form in this area is very challenging as the site has public domain on all four sides. The proposed scheme “turns it back” to Bridge Road and focuses the activation towards the water on a very elevated “upper ground floor” that is 5.5m above street level. This podium approach not only creates an inactivated and unsafe ground level along Bridge Road and alongside the water’s edge it also discourages and blocks access along the foreshore. This is unacceptable particularly as it creates a break in the continuous foreshore access and creates a podium level that is difficult for the disabled and those with prams. Relocating the Fish Markets auction house to the first floor and bringing the activation of retail and food and beverage back to the ground level, with a closer and more intimate relationship to the water, would create a more accessible, transparent and activated street level environment.

If this is not possible to move the market operations to the upper level it will be essential that public access is provided on grade along the entire foreshore and, for the safety and amity of the entire area the ground floor facing Bridge Road must have retail uses (such as coffee shops, sushi bars etc) that activate the street and encourage activity and interactions. The current design locates a gas meter enclosure, three plant rooms, assorted lobby’s, an exhibition space and windows into an auction floor that is not in use for most of the day and this does not create an “ground level active frontage” as claimed in the EIS.

The new retail and food and drink premises are proposed to be 12,100sqm. This is in addition to 11,000sqm of Fish Markets. To put this in context Barangaroo South is approximately 16,000sqm of retail, cafes, bars. This would mean the proposed retail is only 25% smaller than that at Barangaroo South. The current Fish Markets are only approximately 6,500sqm, so there is a proposed 355% increase on existing area.

I'm also concerned about noise impacts of the proposed development. The current Fish Markets close at 4pm and has limited outdoor dining. The proposed development is intended to operate from 7am - 10pm Sundays to Thursdays and 7pm to 12am (midnight) Fridays and Saturdays and have extensive outdoor dining areas. Restricted licences that are monitored for impact on the surrounding area and do not allow outdoor music will be critical for all outdoor spaces.

Landscape

The existing Morton Bay Fig Trees are an important feature of this part of Sydney. It will be critical with any development that the health of these trees is not compromised. When Barangaroo was being planned there were large and significant Fig trees along Hickson Road but the impact of the dust and construction of the development killed all the trees in this area. It would be incredibly sad if this impact also occurred along Bridge Road.

Conclusion

I support the retention of the Fish Markets in this part of Sydney and understand the need to move the Fish Markets to a new location to allow the existing markets to continue operating during redevelopment. I hope that the NSW State Government will take the time to ensure that this facility, and the entire Bays Market District, contributes to the creation of a great place that is connected and integrated into the surrounding area and doesn't create a blight on the surrounding area with increased traffic, unacceptable noise impacts and an unsafe and disconnected waterfront and streetscape area.