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Department of Planning, Industry and Environment
Blackwattle Bay redevelopment submission
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National Trust submission: Blackwattle Bay State Significant Precinct Study

Thank you for the opportunity to provide comment on the Blackwattle Bay State Significant Precinct Study. The National Trust of Australia (NSW) has several specific concerns regarding the study, particularly in the context that this study purports to “help shape the future of Blackwattle Bay.”

The Trust supports continued public access to the foreshore, open green space, community uses and the redevelopment of Blackwattle Bay in a manner that is consistent with community values. However, the current proposal represents a mass overdevelopment of the area, falls short of community expectations and fails to respond to the existing human-scale character of Pyrmont and Glebe.

We have reviewed the extensive documentation and believe that there are a number of key elements to the proposal that need to be either addressed or seriously reconsidered. These include:

- Inadequate assessment of heritage impacts;
- Misleading visual impact assessments;
- The height and envelope of buildings;
- Significant overshadowing of Blackwattle Bay and other public areas; and
- Poor place-making and public domain outcomes generally.

The National Trust supports the redevelopment of this significant part of our harbourside, however, the current proposal yet again represents an over-emphasis on developer yield at the expense of public benefit. This letter sets out our concerns in more detail.

Inadequate heritage impact assessments

The *Blackwattle Bay State Significant Planning Study's* Masterplanning Principles makes no reference to the existing heritage and character of the area, despite there being detailed earlier heritage studies of the area. One such study, the *Pyrmont Peninsula Place Strategy's Heritage Study* (GML Heritage, 2020) recommended that new development on Pyrmont Peninsula should not dominate or compete with the horizontal landform of the peninsula and that it should be respectful and consistent with the character of the area in terms of its scale, form, rhythm and materiality.

The Heritage Impact Statement by City Plan Heritage P/L for the SSP proposal fails to adequately assess the cumulative impact of the development on the Pyrmont peninsula's overall heritage value, it fails to assess the impact on nearby heritage conservation areas and it does not address the impact of the tower height on the landmark values of the ANZAC Bridge.



In relation to the Heritage Impact Statement, the Trust supports the identification of the buildings at 1-3 Bank Street as a potential heritage item. The Trust is well aware of the history and significance of this site and, particularly in view of the evolution of the fishing industry in Sydney Harbour, its increasing significance and rarity as a survivor from the mid-twentieth century operation of the fishing industry, with important links to the defence of Sydney during WW2.

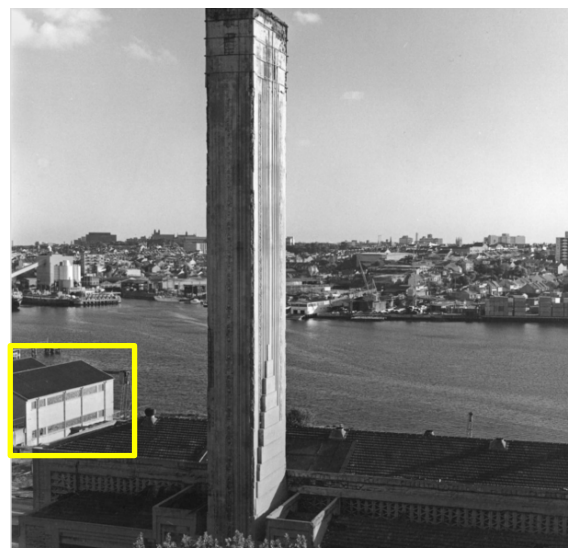
The Trust is aware of two other potential heritage items along the Blackwattle Bay foreshore that were not identified in the Precinct Study. In the context of the nature and size of the proposed development, these are notable omissions: the former Pyrmont Ash Handling Depot, and the tunnel systems associated with the Shell Oil Company.

The Trust does not suggest that either of these items is of State significance but they are certainly of some Local significance however, and the omission of these sites in the survey and assessment of the Blackwattle Bay area is of concern, particularly given that a plan showing the tunnel is reproduced twice in the report (Figures 28 and 39) but not explored further.

Pyrmont Ash Handling Depot



Former Pyrmont Ash Handling Depot (Source: SixMaps)

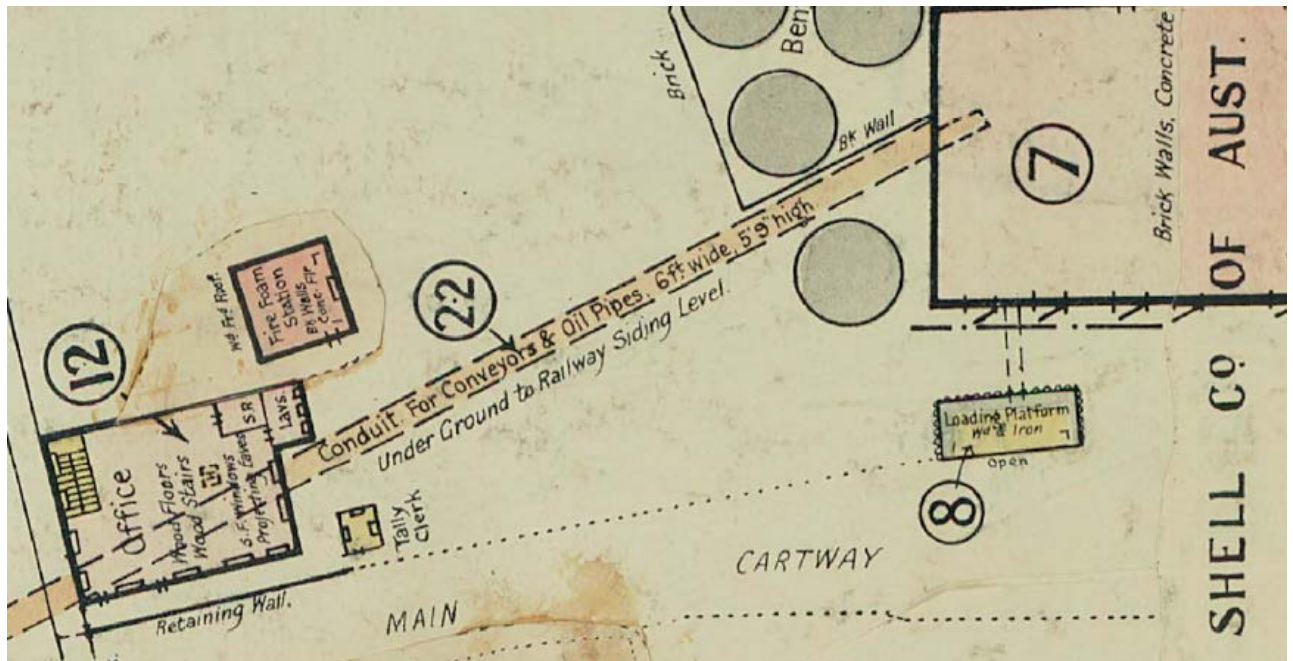


Pyrmont Ash collection Point (City of Sydney Archives)

The double-gabled shed at 21-29 Bank Street was established in its present form in the 1950s as the 'Ash Depot' for Pyrmont Power Station. The gable roofs cover a pair of inlets (docks) in which ash barges were loaded, to be towed out to sea for dumping. The 'covered' barge loading facility represents an attempt by the operators to contain the dust generated by loading and it operated in this form until the closure of the Power Station in the 1970s. The practice of dumping ash (and other waste material) at sea was common throughout the twentieth century and, although this would no longer be an acceptable practice, it has historical relevance to the history and evolution of power generation and waste management in Australia. The Trust have not inspected these buildings recently, but given they were designed specifically for boats to pull in to their docks, they would be a logical solution to the storage of the popular dragon boats in Blackwattle Bay.

Historic Tunnel

The present Fish Markets site was, in the early twentieth century, a depot for the Shell Oil Company where oil products imported from overseas were landed and distributed. In this era, bulk oil tankers were unknown and oil products were typically imported in drums and tins. A tunnel was built running under Bank Street from the Oil Depot to a siding adjacent to the Goods Railway Line (approximately where the present Fish Markets Light Rail Stop is located) to allow the easy transfer of drums and tins to the railway line, for ultimate distribution around NSW. The present state of this tunnel is unknown but it was intact in the 1990s. The northern portal is understood to have been closed as part of the conversion of the Goods Line to the Light Rail but no other information is currently available.



Detail of Plans of Sydney (Fire Underwriters), 1917-1939: Block 203, clearly showing the tunnel (City of Sydney Archives)

The Visual Impact Assessment does not clearly represent the impact of the proposed development.

The National Trust have very serious concerns with the images for this major proposed development that have been included in the Visual Impact Assessment. The images, as presented, do not allow the general community to understand the true impact of the proposal that is being put forward.

Visual Impact Assessments should be objective, independent assessments of proposed developments. As very few people have been trained to “translate” building plans or to decipher detailed technical studies (such as the 49 technical studies and addendums on exhibition for this proposal), an accurate computer-generated image is a critical tool that should clearly show the extent of a development and its impact. In this context, the use of a light transparent blue to portray the proposed buildings in the visual landscape unreasonably softens their impact, in a way that is unsettling and, arguably, deceiving.

The views presented of the proposal as seen from Wentworth Park, in particular, shows the proposed towers to be almost totally invisible, while other views show the clouds in the sky shining directly through the proposed towers, and even the city skyline with Centrepont Tower clearly visible where a tower would in fact block this view. This misrepresentation of one of the most significant components of this proposal – that is, the excessive height of the proposed towers – is of great concern.

The data in Visual Impact report is also not clearly presented. For instance, it states that “*the majority of the visual impacts fall within the negligible to moderate scale (eleven viewpoints), with nine viewpoints registering a moderate/high to high rating.*” However, this simple statement collates the data by grouping three datasets (low, moderate-low, and moderate) against only two datasets (moderate-high, high).









If visual impacts are to be selectively grouped, the groups should present a realistic representation of the findings. In the Trust review of the report, for example:

- Nine important viewpoints have moderate-high or high impact;
- Three important viewpoints have moderate impact; and
- Six important viewpoints have moderate-low or low impact.

When grouped in this way, a different picture emerges than that presented in the report.

The National Trust call for a complete revision of this key document so that it accurately shows the impact of this proposal.



Visual Impact Assessment views as presented, with totally transparent towers	The same illustration, given a 'solid' dimension by the National Trust to show actual impact
	
	
	
	



Excessive building heights and envelopes

The proposal to allow twelve building envelopes, each of up to 45 storeys high (approx. 156m) along the waterfront will create a wall of development, blocking the harbour from the rest of Pyrmont. This is higher than the Anzac Bridge, as well as any other building west of Pyrmont Bridge at Darling Harbour. Earlier community surveys indicated 92% of people surveyed supported the need for design excellence requirements to ensure that any new built form in the area should reflect the waterfront nature and traditional low rise character of the Glebe and Pyrmont areas¹.

Buildings of this height, especially within this narrow space, will visually dominate Blackwattle Bay, crowd the Anzac Bridge (whose pylons are only 120m tall), obstruct views and vistas to and from the Pyrmont and Glebe Peninsulas and create a wall of buildings that will alter the perception of the urban morphology and the remnant historic cultural landscape. These towers will also impact a key approach to the city from Anzac Bridge, with all views to the west showcasing the spires and skylines of Glebe, Annandale and Sydney University totally obscured.

The three “options” presented all contain buildings of excessive height, and are not options at all. These heights are not supported by large portions of the community, as is reflected in earlier consultation reports and submissions made for the Pyrmont Peninsula Place Strategy and the Blackwattle Bay Master planning project.

The Trust feel that the height of the towers must be drastically reduced, and that the deck of the motorway would be the logical starting point for one such option. The towers as presented bear no relationship to the historically established urban patterns of Pyrmont and Glebe, and will have significant negative impacts on any new urban spaces proposed as part of this proposal.

Significant overshadowing of public spaces

The height and mass of the proposed towers will cast shadows along almost the entire proposed public domain, including the public waterfront promenade and even the new, outstanding, Sydney Fish Market. The built form, as proposed, will likely result in poor wind conditions also. This combination of shady, windy streets not only inhibits any future tree growth, but will also mean that Blackwattle Bay will be an unattractive place for people to dwell – an unbelievable outcome for a world-class harbour city gifted with such natural beauty as Sydney.

The Urban Design Statement (p.21) describes “a ribbon of parks and open spaces with distinct characters” that are “linked by the waterfront promenade and street network, providing places for active and passive recreation, gatherings, performances, kid’s play and relaxation and supporting an ecological renewal of the precinct.”

Yet sunlight to the parks is less than is required by the City of Sydney, and indeed the new “public open spaces”, when compared to the shadow diagram will be in permanent shade, particularly in the morning and at lunchtime when they should be gaining the most patronage. Mornings are a key time for water sports on Blackwattle Bay, harbourside walks and visits to the fish markets. Having towers that throw these areas into shadow will also impact the new Fish Market, whose roof and harbourside platforms are designed specifically to engage with the sunlight of the bay.

This is a poor approach to place-based planning and is not what our iconic harbour and Pyrmont deserve. Good urban design must aim to restrict any tower buildings to locations on the Peninsula that do not compromise solar access to public spaces, in particular places for public recreation and the foreshore.

¹Elton Consulting. 2017. *Masterplanning the Bays Market District - Draft masterplan principles Consultation Report*, prepared for UrbanGrowth NSW, p.12.



There is only one way to reduce such significant overshadowing, and that is to reduce building height and bulk. When the shadow diagram (left) and the public open spaces diagram (right) are considered together, it is clearly shown that between 9am and midday all public areas will be in shade.

The effect on the marine environment

The National Trust is limited in its ability to provide expert comment in this regard but we are concerned about the potential environmental impact of such excessive shadowing on the health of the Bay itself. The Study does not assess the potential overshadowing impacts on the marine environment, especially in terms of concurrent aspirations and works to reinstate Harbour waters to a more healthy level.

The NSW Marine Estate notes that seagrass beds are a key estuarine habitat which provides food and shelter for many marine animals. Seagrasses are marine plants that require sunlight to live and grow, and even single jetties and pontoons can pose a threat to the health of seagrass beds, as they reduce the amount of sunlight reaching the seagrass.² The Trust notes that seagrasses are not currently present in the Bay but we also note that the *Urban and Marine Ecology Constraints and Opportunities* report by Eco Logical for this development states (p.44): “species known to occur nearby in Sydney Harbour, but not found in Blackwattle Bay, could colonise the bay if habitat conditions are suitable, and connectivity of neighbouring habitats support migration”.

The Trust’s concerns extend to other fish and invertebrates whose preference is for a sun-lit marine environment. There is a risk that shading will therefore favour the colonisation of non-native species in these areas (Dafforn et. al. 2012).³ The requirement for increased sunlight penetration to improve the marine environment at the shoreline was a key feature of the redevelopment of Elliot Bay as part of the currently-underway Seattle waterfront wharf redevelopment and similar standards should be applied in this case.

The Eco Logical report notes (p.7) that the existing aquatic habitat and biodiversity of Blackwattle Bay “are comparable, if not slightly poorer condition, than nearby bays within Sydney Harbour (Rozelle, White and Johnstons Bay, Gore and Iron Cove).” This must not be a justification for not aiming to improve the water quality and marine biodiversity of Blackwattle Bay. Indeed, the October 2018, *Duba, Budu, Barra: Ten Steps to a Living River – the Parramatta River Masterplan* produced by the Parramatta River Catchment Group outlines the sort of approach that needs to be taken – and the opportunities that exist – for Blackwattle Bay. As that document states: “If we continue to manage the river and its catchment in the way we do, water quality and river health is predicted to worsen as the city grows. If we improve our management, water quality and river health will continue to improve, and the river will be swimmable again.”

The *Risk-based Framework for Considering Waterway Health Outcomes in Strategic Land-use Planning Decisions* document, prepared by the Office of Environment and Heritage and the Environment Protection Authority, is not referenced as one of the State planning documents against which this proposal is assessed.

² <https://www.marine.nsw.gov.au/strategy-implementation/delivering-healthy-coastal-habitats-with-sustainable-use-and-development/reviewing-jetty-designs>

³³ <https://www.fishhabitatnetwork.com.au/fish-friendly-marinas-wharves-and-pontoons-and-boardwalks-fish-friendly-marine-infrastructure>



A foreshore walk that is not world class

In addition to being in almost permanent shade, the 10m wide “promenade” that is proposed for this site is not world class at all, particularly when this is adjacent to a tall building elevation. To seriously suggest that a 3m wide zone is suitable for two-way “medium recreational cycling, walking and jogging” is bordering on the ridiculous. The Trust would agree with the City of Sydney and maintain that for a truly world-class foreshore walk this zone needs to be of much greater width. This foreshore needs to be generous and of good quality.

The development does not respond to the existing character and scale of the area.

At its core, placemaking seeks to build on existing character, meaning and identity – something that Pyrmont and adjacent Glebe offer in abundance. A building of 45-51 storeys does not complement the Pyrmont Peninsula heritage character, nor respond to the overall low-to-medium-rise character across the peninsula and nearby Glebe (with noted recent intrusions and exceptions at Jacksons Landing and Darling Harbour).

Pyrmont Peninsula’s major commercial, entertainment, residential and retail buildings sit comfortably with terrace housing, smaller shops and heritage areas. They benefit from the area’s proximity to the CBD but also from the character and charm of surrounding buildings and public domain. From an industrial slum, Pyrmont has grown to be an attractive place to live, not the least because it retains a human scale in its built environment. Future development should support that character, rather than dominate it.

Conclusion

It is an unfortunate, yet accurate, assessment of Australia’s development over the last two hundred years, that many planning and development outcomes have been driven by attention to economic outcomes, usually for a select few, at the expense of the evolutionary growth of the communities in which they are located. The recent developments at Barangaroo, with its continually reduced public domain elements yet increased building footprints, is a prime example.

The pollution of Sydney Harbour’s water and sediments, the loss of flora and fauna species and the unchecked clearance of trees for development are all circumstances of our own making. Recent discussions about making the Parramatta River swimmable again offer the hope that is needed – the ability to see that here in Sydney we have something truly remarkable in the form of our harbour, and that its future could be something truly special.

Sun and water – these are perhaps Sydney’s greatest assets.

If the current Blackwattle Bay State Significant Precinct Study is the best that Infrastructure NSW can propose and promote for an area as special as this, then the National Trust have a genuine reason to be concerned for the future of our harbour city.

The Trust considers that there is much work yet to be done to achieve an acceptable result for Blackwattle Bay.

Yours sincerely,

David Burdon
Conservation Director
Director, Conservation