

8 September 2022

Department of Planning, Infrastructure and Environment
Locked Bag 5022
Parramatta NSW 2124

By via website: <https://pp.planningportal.nsw.gov.au/bays-west-stage-1>

Re: National Trust objection to the proposed Bays West Stage 1 Rezoning Proposal - White Bay Power Station (and Metro) sub-precinct.

The National Trust of Australia (NSW) [the Trust] is the state's peak body for the identification, conservation and protection of built, cultural and natural heritage.

The Trust has made earlier submissions on the *Draft Bays West Place Strategy* (May 2021) and the *Draft Bays West Masterplan* (May 2022). In reviewing the *Bays West Stage 1 Rezoning Proposal - White Bay Power Station (and Metro) sub-precinct*, we do hold some frustration at the proposed planning framework's non-response to early submissions and to heritage concerns. This rezoning proposal:

- Is not consistent with the Bays West Place Strategy (2021) or the White Bay Conservation Management Plan;
- Does not meet the intent of the exhibited Urban Design Framework to "Respect the site's iconic heritage structures";
- Reduces the landmark status of the White Bay Power Station;
- Presents a significant missed opportunity for an iconic site.

The National Trust of Australia (NSW) has long advocated for the protection and adaptive reuse of White Bay Power Station and its surrounds – indeed, White Bay was listed on the National Trust Register in 1994. The Trust celebrates the repair, conservation and opening of the site for public enjoyment. However, as a key stakeholder representing our members' interests, we have continued concern at the impact of the proposals on the landmark and visual significance of White Bay Power Station. This letter sets out our concern in more detail.

The extent of the rezoning

The documents on exhibition set out the proposed planning controls for the White Bay Power Station (and Metro) Sub Precinct. Although the future renewal of the remaining areas of the Bays West Precinct (including Rozelle Bay, Glebe Island, and White Bay) will be subject to separate staged master planning and rezoning, the Trust understands that any master planning and rezoning of the remaining land within the Bays West Precinct will need to consider and respond appropriately to the final controls and land use zones that apply to Bays West Stage 1 (as detailed in the Explanation of Intended Effects).

Accordingly, these planning controls have far-reaching consequences – indeed, we are concerned that the name of this rezoning (White Bay Power Station and Metro Sub-Precinct) is publicly misleading and contend that it has not been made publicly clear that this sub-precinct's planning controls will apply to all of the other sub precincts.

The Trust strongly recommends that the exhibited planning controls only apply to this sub-precinct and that planning controls for other sub precincts will require their own consultation and exhibition.



The revised Masterplan and rezoning controls

The Trust understand that revisions have been made to the Stage 1 Master Plan following its earlier exhibition, and this has also informed the new planning controls proposed to be implemented in the State Environmental Planning Policy (Precincts—Eastern Harbour City) 2021. These SEPP amendments will also refer to the proposed draft Design Guide that will also facilitate future design outcomes for the precinct.

In essence, the proposed rezoning of the White Bay Power Station and Metro sub-precinct will enable the delivery of:

- 71,000m² commercial floor space and 4,700m² retail floor space.
- 23,900m² residential floor space (250 homes).
- 41,650sqm of new public open and green space.
- District multi-purpose community floor space including a community centre, library hub and cultural uses.
- Revitalisation and protection of heritage listed White Bay Power Station.
- Improved public and active transport including cycle ways.



Artists impression of proposed sub-precinct redevelopment

Reiteration of earlier feedback

White Bay Power Station's visual significance is well known and uncontested. The Statement of Cultural Significance in the Conservation Management Plan (CMP) for White Bay Power Station notes (National Trust emphasis in bold) that:

*White Bay Power Station is of exceptional aesthetic and social significance to Sydney residents as **a prominent and widely recognised harbourside industrial landmark**, signalling the entry point to the Balmain peninsula from the south and east, and is **highly visible** from major approach roads, streets and surrounding areas. The form and arrangement of the buildings, and in particular the two chimney stacks, are visible from many parts of the inner west and are a constant reference point.*



White Bay Power Station is of exceptional social significance for both local residents and former employees as an important landmark, one of few surviving industrial structures that were once the signature of this locality. It is a potent symbol of the area's industrial origins and working traditions which have influenced domestic and community life, and is associated with a 'working class' character.

Despite this well-known and uncontested visual significance, the Trust has had continued concern with the Bays West proposal's impact on this significance. As stated in our submission (6 May 2021) on the draft Bays West Place Strategy:

The Strategy should ensure that key views to and from the Power Station are identified and protected to ensure that this building can be a key historic focal point.

The Trust are concerned that the Draft Strategy does not adequately address significant viewlines to, from and within the precinct. White Bay Power Station should always remain a prominent feature of the area and should not be dominated by other larger structures.

Further, feedback offered in our comments on the exhibition of the draft Masterplan noted that:

The Trust has deep concern that significant views to White Bay Power Station and ANZAC Bridge will be obscured by the proposed tall buildings, and that the Plan is inconsistent with the CMP and the Bays West Strategic Framework (2021).

The Plan should ensure that key views to and from the Power Station, as identified in the endorsed CMP, are protected to ensure that this building can be a key historic focal point. The Trust are concerned that the Plan allows for substantial obscuring of significant viewlines to, from and within the precinct. White Bay Power Station should always remain a prominent feature of the area and should not be dominated by other larger structures.

The Trust continues to hold these concerns and does not support the proposed rezoning height allowances and their impact on these significant views. As reiterated on p.27 and 36 of the Revised Masterplan, the Bays West Place Strategy was very clear when it noted that new built form must:

- Respect the site's iconic heritage structures and working harbour experiences in four-dimensions, by considering the shifting vistas from actual movement networks such as views towards the White Bay Power Station. These include views from travelling along the Anzac Bridge, or to the Harbour Bridge from within the Sub-precinct.
- Protect district and local views and vistas, maintaining prominence and significance of the WBPS, the silos and Glebe Island Bridge as key heritage landmark structures.
- Provide appropriate urban block scale to maximise permeability especially in proximity to open space and waterfront zones.
- For any new buildings adjoining or in the vicinity of the WBPS, respect the scale, presence and curtilage of the White Bay Power Station and the Conservation Management Plan.

The National Trust is at a loss to understand how a proposal so inconsistent with these stated objectives and which is not supported by its own Heritage Impact Statement continues to be put forward as an acceptable solution.

Map of Heritage Places

The Map of Heritage places proposed in the documentation indicates a heritage boundary that is not consistent with the State Heritage Register boundary of the site and significantly reduces White Bay's heritage curtilage. The National Trust does not support this reduced curtilage and firmly advocate that the listed SHR boundary should continue to be reflected in planning control heritage maps for the site.



Proposed curtilage as indicated in the rezoning proposal heritage map



State Heritage Register gazetted curtilage



Rezoning proposal increases building heights and further impacts significant views

As stated in the Statement of Heritage Impact for the rezoning proposal:

In relation to building form and height, the proposed height limit for the over station box for Sydney Metro West is set at relative level of forty metres (RL40) and relative level of twenty-four metres (RL24) south of the metro box.

This is an increase from maximum relative level of twenty-two metres (RL22.2) and scaling down to a relative level of eighteen metres (RL18) close to the Power Station detailed in the Bays West Urban Design Framework (page 91).

The over station development is a substantial increase in height to the Bays West Place Strategy and will have moderate heritage impact on viewsheds from the south and east and will have moderate heritage impact on viewsheds from the south and east.

The Trust is at a loss to understand how the building heights proposed in the planning controls have increased from earlier exhibited proposals, despite multiple submissions and guidelines stating that significant view lines must be retained and respected, and despite the Consultation Summary stating:

- *Further detail was requested in the draft planning controls to ensure that heritage is appropriately considered (p.8)*
- *Concerns were raised regarding the scale of the development and building heights (p.6); and*
- *The feedback noted that changes to the size, height and scale of development can help to protect the character of the precinct and its heritage values, and also improve both physical and visual connectivity across and beyond the Precinct. (p.8).*

Overall, the Consultation Summary Report was underwhelming and entirely inadequate. For a project that received 911 submissions, a response report of 11 pages (which included only 4 pages of actual response) is alarmingly tokenistic. Submissions are not publically available and the document did not even report on how many of the 911 submissions, if any, actually supported the proposal.

Proposed heights are inconsistent with the Bays West Strategy (2021) and the White Bay Power Station Conservation Management Plan

The exhibited Statement of Heritage Impact notes that the proposed heights will have unacceptable impact on the power station's views and setting, commenting:

The White Bay Power Station is a significant landmark in the area and to local communities, marking the border between the industrial waterfront areas to its east and the suburbs to its west and north.

These landmarks form the character of the place and are visible from many areas around the bays for a long time and should not be inappropriately diminished or scaled down. Views can be framed with taller buildings in the vicinity, but major axis views should be retained.

The Statement of Heritage Impact notes that views to the Power Station from the Anzac Bridge will be partially blocked by the Sydney Metro West over-station development. The over-station development will be set at relative level forty metres and will block the northern half Boiler House east elevation and completely block the east elevation of the Coal Handling Shed from Anzac Bridge approach.

Importantly, it also shows that:

The extent of blocking is more than desired under the Bays West Strategy and the Conservation Management Plan policy 1.2.5 which states:

Policy 1.2.5 Lower level structures between the Anzac Bridge (western approaches) and the White Bay Power Station could be constructed as long as they do not substantially obscure the major view of the east front of the power station. The full height of the glass curtain wall to the 1958 boiler house should be visible from the western approaches to the Bridge



The CMP policy envisages future developments to be low level structures so that views to the Power Station are “substantially unobscured” as the major view from the east. Yet, the proposed view and height of buildings essentially show approximately one-third of the curtain wall as obscured by the new structures.

With particular reference to the important views of the Power Station from Anzac Bridge, the Heritage Impact Statement is very clear (p.80) that the extent of blocking is more than desired under the Bays West Strategy and the Conservation Management Policies.

The Bays West Urban Design Framework was very clear in its restrictions that:

- *Reading of 2 no. chimneys on skyline must be maintained, uncrowded by new buildings.*
- *Reading of all existing building elements highlighted must be maintained.*

The following illustrations show the intent of these restrictions compared with what is being proposed:



Viewshed from Anzac Bridge as defined in the Heritage Impact Statement (p.80) showing that the view of the existing built elements and the chimneys in particular must be retained. The report notes that “The over-station development will block the northern half Boiler House east elevation and completely block the east elevation of the Coal Handling Shed from Anzac Bridge approach”

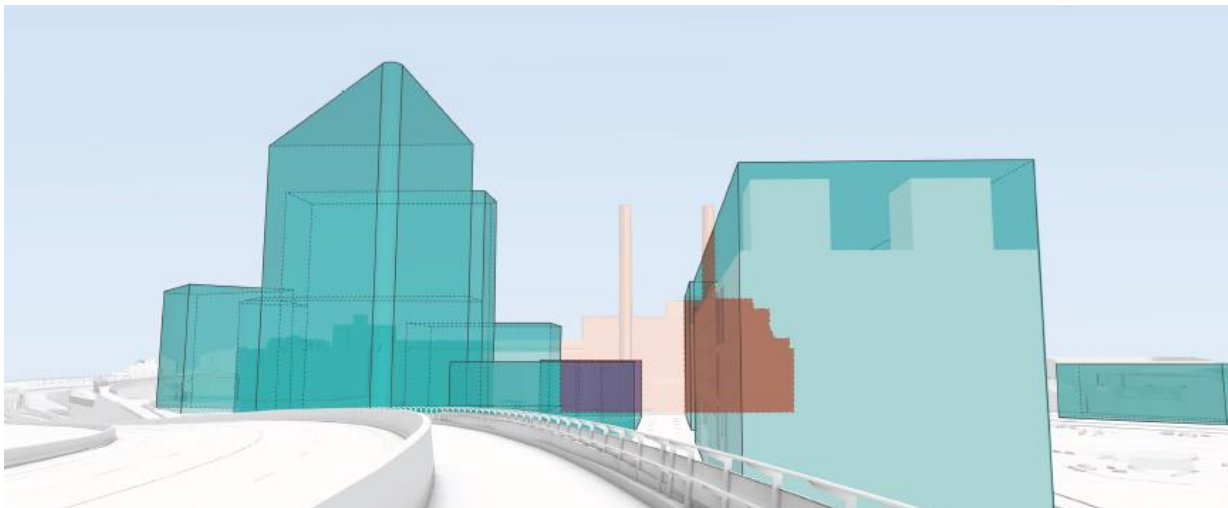


Image from Revised Masterplan (p.122) showing how the Power Station and its distinctive chimneys are almost completely obscured by the proposed development. The “landmark” status of the Power Station has been lost.

Statement of Heritage Impact Recommendations

It should be noted that the National Trust does support the following values that are expressed in the revised Masterplan:



- The White Bay Power Station must be conserved and repurposed as the focal point of the precinct. Reuse must be consistent with its Cultural Significance, as set out in the Statement of Significance and consistent with Conservation Policy detailed in the Conservation Management Plan. New uses inside the power station should be compatible, inspired and respond to the existing spaces.
- Development must retain and respect the visibility and prominence of the power station as a harbour-side landmark and industrial landmark to the local community.
- The unique industrial and maritime history should be integrated and interpreted which will underpin the future use and the character.
- The reuse of the White Bay Power Station should have a public benefit and public access strategy underpinning the core reuse.

The National Trust also supports these additional recommendations that stem from the Statement of Heritage Impact:

- The southern penstock should be heritage listed to ensure it has statutory protection as a heritage item.
- Open spaces detailed in the Master Plan are protected as part of the legislative framework.
- Below ground structures are to be identified, assessed and preferably retained. This particularly applies to the water coolant canal which runs continuous from White Bay to Rozelle Bay passing through the Turbine Hall. It should be noted that this canal is active and in part services the White Bay Power Station with stormwater runoff. Any blockage of this canal has the potential to cause stagnant water issues as well as cause unintentional physical damage to White Bay Power Station.
- Archaeological potential to be assessed and integrated with the implementation of the Master Plan.
- The Heritage Interpretation Strategy prepared as part of the Draft Master Plan is to be implemented.
- New buildings, structures or landscape modifications are to be implemented in accordance with the Master Plan and will need to be individually assessed with a Heritage Impact Statement.

However, like the Statement of Heritage Impact, the Trust believes that the “Heritage guidelines and controls expressed in the Master Plan, Design Guide and other related documents, not least the Conservation Management Plan, are viewed as minimal requirements and not maximum goals.”

Summary

In summary, the proposed planning controls as exhibited as part of the rezoning package is not supported by the National Trust. They are not consistent with the Bays West Place Strategy (2021) or the White Bay Conservation Management Plan; indeed, they do not meet the intent of the exhibited Urban Design Framework and Revised Masterplan to “**Respect the site’s iconic heritage structures**”.

The Statement of Heritage Impact notes:

The White Bay Power Station is a significant landmark in the area and to local communities, marking the border between the industrial waterfront areas to its east and the suburbs to its west and north.

These landmarks form the character of the place and are visible from many areas around the bays for a long time and should not be inappropriately diminished or scaled down.

Last year, the NSW Government released the Bays West Place Strategy. At its core, this document was about understanding what made this place special. It noted the rich history of the site, its strategic position, and the endless opportunities for renewal.

As the then Minister for Planning and Public Spaces, Rob Stokes, said in the foreword to that document, “*For me, the towering, rusted, disused power station could be the centrepiece of this new harbourside precinct; one that will draw new business and entertainment and cultural opportunities.*”



The impact, as detailed in the Statement of Heritage Impact, is not an acceptable outcome for this highly significant, visual Sydney landmark. For decades, since listing the White Bay Power Station on our Register in 1994, the National Trust has shared this same ambition for this important component of our city – for it to be the centrepiece of a fantastic new precinct. But for this vision to be realised, the centrepiece needs to remain front and centre.

Yours sincerely,

Jane Alexander
Advocacy Manager