

26 August 2022

Geoff Gerring
Director of Development - Blackwattle Bay
Infrastructure NSW
Level 27, 201 Kent St
Sydney NSW 2000

By web: <https://www.planningportal.nsw.gov.au/blackwattlebay>

Dear Mr Gerring,

Re: National Trust objection to the revised Blackwattle Bay State Significant Precinct proposal

Thank you for the opportunity to provide feedback into the revised Blackwattle Bay State Significant Precinct (SSP) proposal. As you are aware, the Trust made a detailed submission¹ on the initial Blackwattle Bay SSD and we acknowledge that some small improvements have been made by Infrastructure NSW (INSW) to their scheme in response to submissions, including:

- Reductions in the height of buildings by between 4 metres and 21.5 metres;
- Reduction in density by 15%, with approximately 34,500 square metres less GFA across the precinct.

We hold concern over other “improvements”, especially, as an example, the widened foreshore promenade (over-water boardwalk). The revised plan claims to respond to the huge public demand for a wider promenade to link waterfront walkways in Glebe and Pyrmont. However, the revision now proposes to increase the width of the promenade by building the increased width over the water. While this will increase the promenade’s width, it will also increase the development’s shadowing effect on marine faunal environments. A better solution would be to reduce the setback/footprint/GFA of the commercial buildings to allow the necessary space for a larger promenade, rather than ‘robbing Peter to pay Paul’ by transferring the proposal’s impact onto the fragile marine environment. Further, the initial proposal did 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. It is unfortunate that the revised scheme also fails to assess the impact of both the tower’s shadows and the boardwalk’s shadows.

The National Trust support the redevelopment of this significant part of our harbourside, however, both the previous and revised proposal yet again represents an over-emphasis on developer yield at the expense of public benefit. On the whole, the revised scheme fails to adequately and meaningfully respond to the concerns it has generated by offering a true redesign and reduction of impact.

Despite these small improvements offered in the revised proposal, the Trust firmly maintains the majority of its objections, as raised in our original submission, that a number of key elements to the proposal need to be either addressed or seriously reconsidered. These include:

- That the proposal falls immensely short of community expectations;
- That the proposal contains an inadequate assessment of heritage impacts;

¹ Concerning, we note our submission, although referred to in the Response to Submissions report, is not included online in the public submissions and is thus not available publicly.



- That the proposal contains misleading visual impact assessments;
- The height and envelope of buildings represents a mass overdevelopment of the area that fails to respond to the existing low scale and character of Pyrmont and Glebe, and will create significant overshadowing of Blackwattle Bay and other public areas; and
- That the proposal represents poor place-making and public domain outcomes generally.

In particular, the response to Submissions Addendum offered by the project's heritage consultants does not address its earlier failure to adequately assess the cumulative impact of the development on the Pyrmont peninsula's overall heritage value or its impact on nearby heritage conservation areas. The heritage addendum's insistence that these impacts will be assessed at later stages of the development are counterintuitive – in order to properly inform the overall design, massing, scale and impact of the proposal, a thorough understanding of the heritage significance of the area and impact of the proposal on this significance is required at this stage of the proposal.

We continue to question the objectivity of the Visual Impact Assessment and have serious concerns with the images for this major proposed development that have been included in the initial Visual Impact Assessment and its current revision. The images, as presented, do not allow the general community to understand the true impact of the proposal that is being put forward. As stated in our original submission, 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 revised visual impact's switch from transparent buildings to opaque buildings, is arguably still misleading (as illustrated in the images below).



Previous photomontage based on model dated 22/12/2020. Refer to LCVA Report dated 20/05/2021 for Existing View.



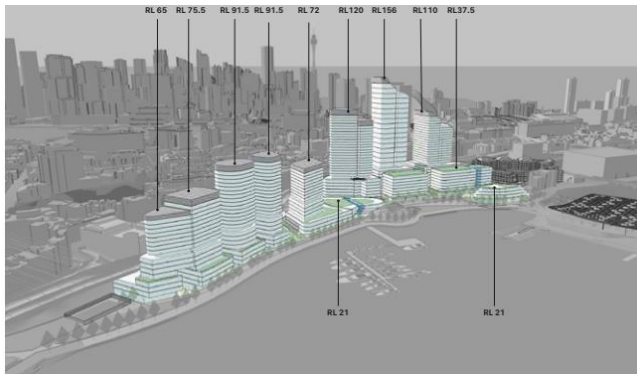
Previous photomontage based on model dated 22/12/2020. Refer to LCVA Report dated 20/05/2021 for Existing View.



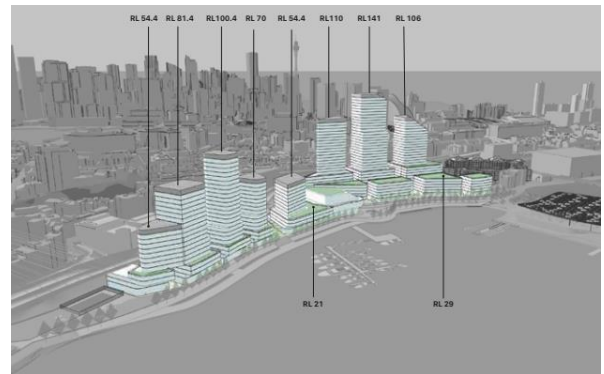
We appreciate that the revised building heights have been lowered for some of the proposed towers, we do note that they have also been increased for others. We maintain that buildings of this height, especially within this narrow space, will visually dominate Blackwattle Bay, crowd the Anzac Bridge (whose 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.



Previous scheme



Revised Scheme

In summary, the Trust still considers that there is much work yet to be done to achieve an acceptable result for Blackwattle Bay.

Yours sincerely,

Jane Alexander
Advocacy Manager