



PRESERVING OUR HERITAGE

PO Box 85, HUNTERS HILL, NSW 2110
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Minister Paul Scully
Department of Planning, Housing & Infrastructure
Parramatta, NSW 2124

21 February 2024

Dear Minister

Re: Central Barangaroo Concept Plan Modification 9 revised proposal

The Hunters Hill Trust is a community organisation formed in 1968, arising from threats to heritage across our local government area. We maintain a large and active membership due to concern for ongoing planning decisions which incrementally change the character of our suburbs and urban settings. Trust members apply our best efforts to protecting not only the built environment but also the natural landscape that invariably provides the context for so much of our sense of place – the bushland, parks, tree canopy, sandstone and gardens which enhance the heritage that we value and aim to preserve.

The Trust was integral to the saving of Kelly's Bush from residential development in Hunters Hill, now widely valued regenerated native bushland and recognised globally as the first Green Ban. Jack Munday, the Union Green Bans and an engaged community went on to enable vital heritage and public space protection across Sydney in the 1970s.

Most particularly, they were successful in The Rocks, where plans by the State Government and developers were threatening to destroy the unique character of Sydney's Old Town. Preserving this historic precinct has provided an exceptional gift to residents of our city and state, as well as for visitors and overseas tourists alike.

The Trust wrote a submission in August 2022 to strongly object to the proposals lodged by Infrastructure NSW and outlined in the Central Barangaroo Concept Plan Modification 9. We take this further opportunity to reiterate our view that approving the level of development proposed will detract disastrously from established heritage values and amenity, not only for the immediate experience of place but also for the historic views both to and from significant landmarks of The Rocks, Millers Point and Observatory Hill, universally enjoyed as a commonly held 'public good' and now, it seems, at risk. These sight lines are rightly considered to belong to all who live or visit here. It is unimaginable that they might disappear forever.

Approving this further bulk, density and disruption would be indefensible. The revised proposed Modification is not consistent with the originally approved Concept Plan or with the Statement of Commitments issued for the Barangaroo Development. Neither is it consistent with the Sydney Harbour Regional Environment Plan requirements for the protection of public views, or with policies in the Sydney Harbour Bridge Conservation Management Plan relevant to the protection of iconic views.

We make the following points to the above objections:

- The developer of Central Barangaroo seeks to double the size of the approved Concept Plan (from 45,000 to 104,000 m²), despite offering a negligible improvement in public benefit. It takes much from the community and delivers little in return.
- The heritage sightlines from public open spaces to the opposing foreshore from Observatory Hill and the State Heritage listed Millers Point and Dawes Point precinct are lost under the new proposal.
- The modified proposal reduces the size of Hickson Park and reduces the amount of community space from 28,000 to 2,800 m². This loss of crucial public land is clearly unacceptable.
- The new proposal seeks to build 150 luxury apartments and a new hotel on Sydney Harbour foreshore, an area previously allocated to be the 'civic and cultural heart' of Barangaroo.
- It still blocks the historical views from Balmain and Pyrmont to the heritage listed Millers Point and Dawes Point precinct.

In addition to previous substantive grounds for objection to the last Modification 9 proposal in 2022, there are a number of other significant points of concern:

The developers have doubled-down on the argument that the views below a 35 metre height (higher than the roof line of the Langham Hotel) west of the site (all of High Street, Kent Street, parts of Observatory Hill) were lost when Modification 2 did not approve the development block controls back in 2008 – completely at odds with the Conditions of Consent that these views must be retained.

The applicant has ignored requests to represent the original Concept Plan in visual assessments – despite requests from the Government Architect – suggesting such analysis would be “meaningless”.

The application has changed from a mixed-use retail, office and residential proposal to a primarily (up to 75%) residential development which fails to deliver against the key principle of being the “civic and cultural heart” of Barangaroo and will also fail to fully capitalise on the amenity of the metro station.

The important pedestrian links between neighbouring Millers Point and Central Barangaroo (characterized by the Sydney Steps in previous proposals) do not form part of the proposal.

A cornerstone planning principle for the Barangaroo precinct has been ignored – that heights gradually reduce as the development moves north towards the Headland Park.

The “approved concept plan” promulgated by Aqualand and Infrastructure NSW is based on legal technicalities and not on the established planning principles and original block development controls for Barangaroo (modulated building heights respecting the High Street sandstone wall cutting and terraces above).

The Department of Planning and the Government Architect have not declared what the “approved concept plan” as a base line is exactly.

In conclusion, we urge the government to reject this revised Modification proposal. Our city's heritage and the broader public interest and amenity are being ignored in favour of private gain. Loss of precious adjacent parkland as well as the expanded Hickson Park along the foreshore, granted by the Independent Planning Commission, is highly detrimental to the enjoyment and values of the precinct and represents a further unjustifiable alienation of community land.

In our view, if the public realm and the heritage significance of Millers Point and Observatory Hill are not considered as being worthy of respect and permanently preserved for future generations, this would ensure a sad legacy for the current NSW government. We urge you to reject these revised proposals.

Yours sincerely

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

Karyn Raisin
President
Hunters Hill Trust
www.huntershilltrust.org.au