

7 August, 2018

Department of Planning and Environment
Attn: Director – Key Site Assessments
GPO Box 39
SYDNEY NSW 2001

SSD 7684 COCKLE BAY WHARF REDEVELOPMENT (CONCEPT PROPOSAL)

Dear Director,

On 13 April, 2017, the National Trust of Australia (NSW) lodged its strong objections to the Concept Proposal for the redevelopment of Cockle Bay Wharf.

The National Trust's view was that the proposed Cockle Bay tower development would certainly have a (major) visual impact on the setting of Pyrmont Bridge.

The National Trust had long recognized the importance of the foreshores of Sydney Harbour, its associated waterways and Parramatta River. The **Sydney Harbour Landscape Conservation Area** was listed on the National Trust Register in September, 1982 and the **Middle Harbour and Parramatta and Lane Cove Rivers Landscape Conservation Areas** were listed on the National Trust Register in January, 1983. All these listings urged the maintenance of strict controls to protect the scenic and cultural values and natural beauty of the foreshores.

As early as 1828 steps were taken to protect waterway foreshores. In Governor Darling's tenure, an August 21, 1828 Government Notice from the Colonial Secretary's Office stated that -

"The Government will further reserve to itself all land within one hundred feet of high water mark, on the sea coast, creeks, harbours and inlets."

Sydney Harbour is world renowned for its bushland headlands and foreshore parks and its international reputation is intimately associated with its scenic harbour vistas. However, massive tower development originally confined to the centre of the Central Business District is now being sited on the foreshores. Such development is impacting negatively on one of the world's greatest harbours.

The National Trust confirmed and reiterated its policy of 34 years when the Board of the National Trust on 29 March, 2017 adopted its *"Policy on the Conservation of the Heritage Values of the Foreshores of Sydney Harbour, its associated waterways and the Parramatta River"*.

The Policy stated: -

1. The National Trust strongly reiterates the Trust's policy of some 34 years regarding the implementation and enforcement by the Government and its agencies of strict regulatory controls including set-backs from high water mark and building heights, to protect the scenic, cultural and conservation values of the foreshores of Sydney Harbour, its waterways and tributaries and the Parramatta River.
2. High rise development is not to be sited on the foreshores and, where development is proposed, it is to be of lower scale nearer the water's edge and taking into account the



local topography, stepping up from the waterways.

3. Generous and easily public accessed foreshore reserves and parks are to established, not just limited public access and narrow walkways.
4. There is to be no major overshadowing of foreshore parks and waterways from new development proposed on or near the foreshore.

The Trust rejected the exhibited Concept Plan and called for new proposals in keeping with the principles outlined above.

On 14 December, 2017 the National Trust lodged another objection to the Concept Plan for the Redevelopment of Cockle Bay Wharf reiterating the concerns outlined above and noting the importance of the Cockle Bay Archaeology Precinct.

In terms of the current SSD 7684 Cockle Bay Wharf redevelopment (Concept Proposal) the National Trust makes the following comments.

Section 7.6 Built Form of the Revised Environmental Impact Statement appears to be an attempted justification of increased height in the area at the waterside where the National Trust has always maintained that heights should be minimal.

The Statement notes that “the centre of Darling Harbour has previously accommodated low-scale development to create a ‘valley floor’ feel.” This is an alternative way of expressing the concept of buildings ‘stepping down to the water’s edge’ and is the principle that the National Trust espouses.

The Statement then goes on to argue – “It is noted that recent development consents in the area (notably the Ribbon development, adjacent to the Site, the SICEEP precinct and Barangaroo) indicates that this Valley Floor principle has evolved to accommodate changes in the local built form that include taller buildings.”

This is an extraordinary euphemism. The reality is that the ‘Valley Floor’ principle has been broken and ignored on repeated occasions leading to inappropriate and insensitive development near the water’s edge. This is not ‘evolution’, it is simply bad planning and development building heights way beyond those always intended by the planning system. This is more a mutation than an evolution.

And these mistakes should not become the justification for even more of the same, in this case, very tall buildings on the water’s edge.

A 183 metre tall tower is not appropriate for this location and no reasonable person could regard a building of this height as “an important gateway and marker for entry to the CBD,” as the Environmental Impact Statement attempts to argue.

The Statement then notes that the Darling Harbour Development Plan does not provide controls for building height, floor space ratio or setbacks within Darling Harbour.

When has a Development Plan not controlled building heights, floor space ratios and setbacks, particularly for an area as significant and sensitive as Darling Harbour?

Again, this is another complete failure of the planning system – a totally ineffective and superfluous Development Plan.



For many years, dating back to the early 1990s and the Wolli Creek redevelopment, the National Trust has seen the argument put forward for 'landmark' buildings, code for over-tall buildings which impact severely on their surrounding environment. These buildings certainly do leave their mark, but not in a positive way.

This project is justified with the argument that charrette consultations and Design Review Panels have shaped and mitigated the development's impacts.

The Wolli Creek development was also based on charrettes and a development resulted that belittled and rendered insignificant the John Verge designed 1836 Tempe House and its landscaping including 'Mount Olympus' destroyed by the aforementioned 'landmark' building'. A building which in reality is a very 'ordinary' and lacklustre compared with the State Heritage Register listed landscape that it destroyed. This building was the wrong size and scale and in the wrong location.

The same can be said for Cockle Bay Wharf where the broader Darling Harbour will be degraded by this over-development.

Yours sincerely,

Graham Quint
Director, Conservation