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8 May 2013

The Director-General
NSW Department of Planning and Infrastructure
GPO Box 39
Sydney NSW 2001

Dear Sir

SSD 5752

Sydney International Convention, Exhibition and Entertainment Precinct Redevelopment

I am writing on behalf of Australia ICOMOS to object to the exhibited proposal for redevelopment of the Sydney International Convention, Exhibition and Entertainment Precinct at Darling Harbour.

Australia ICOMOS is Australia's leading non-government professional organisation for cultural heritage. It is the national committee of the International Council on Monuments and Sites, a world-wide non-governmental professional organisation primarily concerned with all aspects of the conservation of cultural heritage. Internationally, ICOMOS is closely related to UNESCO, and acts as UNESCO's principal advisor on cultural matters related to world heritage.

In Australia, we have a nation-wide membership of over 600 practitioners from a wide range of disciplines, working in all facets of the understanding and protection of Australia's cultural heritage. Australia ICOMOS has been particularly active in the development and promotion of the philosophy and standards of practice for cultural heritage conservation. The Burra Charter (Australia ICOMOS Charter for Places of Cultural Significance) has become the Australian national standard for heritage conservation, and has also been the inspiration for a number of similar documents in other countries.

It is Australia ICOMOS policy to comment on development proposals where matters of policy and conservation principle are involved. In this case, it is the opinion of Australia ICOMOS that there has been a demonstrable failure of proper process in relation to cultural heritage.

Australia ICOMOS notes that the Darling Harbour precinct was redeveloped by the NSW Government in the 1980s and at the time was described as a Bicentennial gift to the people of NSW. The development was undertaken by leading Australian architects and designers, and several of its built and landscape components won numerous design awards both in Australia and overseas. We also note that, because these components were completed relatively recently, they have not yet been afforded statutory heritage protection, despite being listed by non-statutory bodies including the Australian Institute of Architects and the National Trust of Australia (NSW).

Australia ICOMOS has studied the Heritage Impact Statement and other documents on the Department's website that relate to the proposed redevelopment, in particular the Heritage Council's letter attached to the Director-General's requirements. This letter recommends that "a detailed Heritage Impact Statement should be undertaken which documents and assesses the heritage significance of the site and its associated landscape, and any impacts the development may have on this significance. This assessment should specifically include an assessment of the landscape features of the precinct and the current Exhibition Centre."

In the light of this recommendation, Australia ICOMOS is very concerned that the Heritage Impact Statement provided by the proponent does not attempt to deal with any of these issues. Although the Statement contains reference to the 1980s redevelopment, it includes no detailed assessment of the place as a whole, nor of any of the components of the Bicentennial work except for three statutory listed items:

the Carousel (listed on the State Heritage Register), the Chinese Garden of Friendship (listed on the S170 Register of the Sydney Harbour Foreshore Authority) and the Robert Woodward Water Feature (being considered for listing on the State Heritage Register). Apart from these, the only items assessed in any detail are statutory-listed items in the vicinity of the proposed development (outside the boundary of the redevelopment site but within the Darling Harbour area). There is no detailed assessment of heritage significance or impact for any of the items on non-statutory lists, including the Exhibition Centre, nor any acknowledgement of those listings.

The Burra Charter states (Article 6.2) that the policy for managing a place must be based on an understanding of its cultural significance. In the opinion of Australia ICOMOS, the Heritage Impact Statement, in confining itself to consideration only of individual items on statutory heritage lists, does not present an adequate understanding of the cultural significance either of the place as a whole or of its components and, by ignoring non-statutory lists, neglects important and readily available evidence of that significance. Australia ICOMOS consequently concludes that the Heritage Impact Statement provided by the proponents is deeply flawed and fails to acknowledge the real significance of the place and therefore the real heritage impact of the proposal.

Australia ICOMOS considers that the proper process for the redevelopment of Darling Harbour, in accordance with the Burra Charter, would be to identify the significance of the place as a whole and the contribution of all of its components (whether listed or not) to that significance. There is no evidence that any such process has been undertaken, either in the Heritage Impact Statement or elsewhere. There is, however, considerable evidence available that the place has cultural significance for the people of NSW, and that the proposal, in demolishing or seriously altering many of its significant components, will have an adverse impact on that significance.

Australia ICOMOS therefore submits that the proposal in its present form should not be approved, and that, before any amended proposal is considered, a comprehensive heritage review of the whole of the precinct should be undertaken to inform the design and allow a true assessment of its heritage impact.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Elizabeth Vines', is positioned above the typed name.

Elizabeth Vines OAM
President, Australia ICOMOS