



Australian  
Institute of  
Architects

SSD 5752-2012,  
Sydney International  
Convention,  
Exhibition and  
Entertainment  
Precinct  
Redevelopment

**Submission to Department of  
Planning & Infrastructure**

**10 May 2013**

## **SUBMISSION BY**

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## **PURPOSE**

This submission is made by the NSW Chapter of the Australian Institute of Architects (the Institute) to the Department of Planning & Infrastructure in response to the Sydney International Convention, Exhibition and Entertainment Centre Precinct - Mixed use Development in the Southern Haymarket Precinct Concept Proposal SSD 5752-2012.

At the time of the submission the office bearers of the NSW Chapter are:  
\*Joe Agius (President), \*Matthew Pullinger (Immediate Past-President), Nigel Bell, Shaun Carter, Emili Fox, \*David Holm, \*Esterban Insausti, Chris Jenkins, Stuart Landrigan, Louise Nettleton, Andrew Nimmo, Peter Sarlos, Howard Smith, David Springett.

The Office Manager of the NSW Chapter is Roslyn Irons. This paper was prepared by Murray Brown, Policy Advisor, and the Chapter Built Environment Committee, for Chapter Council.

\*Joe Agius and David Holm are Directors with Cox Richardson Architects & Planners. They were not involved in the preparation or approval of this submission.

\*Matthew Pullinger is a Managing Principal with Hassell. He was not involved in the preparation or approval of this submission.

\*Esterban Insausti is an architect with Lend Lease Design. He was not involved in the preparation or approval of this submission.

## **INFORMATION**

### ***Who is making this submission?***

- The Australian Institute of Architects (the Institute) is an independent voluntary subscription-based member organization with approximately 10,153 members who are bound by a Code of Conduct and Disciplinary Procedures.
- The Institute, incorporated in 1929, is one of the 96 member associations of the International Union of Architects (UIA) and is represented on the International Practice Commission.
- The Institute's New South Wales Chapter has 2,959 members, of which 1,700 are registrable architect members – representing 56% of all registered architects in NSW.

### ***Where does the Institute rank as a professional association?***

- At 10,153 members, the RAIA represents the largest group of non-engineer design professionals in Australia.
- Other related organisations by membership size include: The Design Institute of Australia (DIA) - 1,500 members; the Building Designers Association of Australia (BDAA) - 2,200 members; the Australian Institute of Landscape Architects (AILA) 1,000 members; and the Australian Academy of Design (AAD) - 150 members.



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## **EXECUTIVE SUMMARY**

The NSW Government's Sydney International Convention, Exhibition and Entertainment Precinct (SICEEP) project is being undertaken through a process that is inappropriate for the planning and development of public land.

Lend Lease is a reputable organisation that should not have been put in the position of both planning and developing this large 20 hectare public precinct. The NSW Government should be the custodian of the public interest in any development affecting public land. City development benefits from the input of multiple players, not one large corporation, no matter how prestigious.

The engagement of the private sector is a necessary step in the evolution of our cities - but private organisations must inevitably balance the cost-benefit equation in their own interests and those of their shareholders. The Government needs to fulfil its responsibility as an informed client and advocate for the public interest by defining the broad scope of the project, the layout and character of the public domain and the parcels of land to be offered to the private sector - rather than leaving these critical steps to a development tender.

# **SSD 5752-2012, SYDNEY INTERNATIONAL CONVENTION, EXHIBITION AND ENTERTAINMENT PRECINCT REDEVELOPMENT**

## **SUBMISSION BY AUSTRALIAN INSTITUTE OF ARCHITECTS NSW CHAPTER**

### **INTRODUCTION**

The NSW Government's Sydney International Convention, Exhibition and Entertainment Precinct (SICEEP) project is being undertaken through a process that is inappropriate for the planning and development of public land.

The Institute considers that the process should have involved the following steps:

1. Developing a master plan based on an analysis of the needs of the tourism and convention industries, the social and economic needs of the neighbourhood and potential or improved links between the precinct and the CBD and neighbouring precincts (this process will be led by government with contributions from private sector consultants)

The master plan would:

- define the public domain, allowing no ambiguity between private and public space;
  - establish goals and benchmarks to balance economic, equity and environmental benefits; and
  - identify the number and type of projects to be contracted out to the private sector.
2. Producing detailed costings tested by community and professional feedback and advice
  3. Creating a public authority to:
    - manage the project, particularly the tendering process, from beginning to end (as is the case with Battery Park City, Docklands and Barangaroo);
    - supervise design quality and public domain improvements; and
    - maintain a broad spread of private sector involvement throughout the life of the project through a multiplicity of projects of various sizes.
  4. Managing an expressions of interest process offering separate and staged projects through PPP arrangements to the private sector.

By contrast the NSW Government has launched the project by:

- offering the complete planning and development process to the market with no preliminary master planning and no community and independent professional input;

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- issuing a license to one private sector organisation to undertake this work;
- removing oversight of the project from the public sector organisation previously responsible for the precinct - the Sydney Harbour Foreshore Authority.

Lend Lease is a reputable organisation that should not have been put in the position of both planning and developing this large 20 hectare public precinct. The NSW Government should be the custodian of the public interest in any development affecting public land. City development benefits from the input of multiple players, not one large corporation, no matter how prestigious.

The SICEEP project continues a disturbing recent trend in city development - the awarding of contracts to single developers for large precincts such as Jacksons Landing (11.7 hectares) and Barangaroo South (7.5 hectares). While acknowledging that the developer commissions components of these sites from a range of architects, the Institute contends that city development is better served by a multiplicity of players in the development industry.

The engagement of the private sector is a necessary step in the evolution of our cities - but private organisations must inevitably balance the cost-benefit equation in their own interests and those of their shareholders. The Government needs to fulfil its responsibility as an informed client and advocate for the public interest by defining the broad scope of the project, the layout and character of the public domain and the parcels of land to be offered to the private sector - rather than leaving these critical steps to a development tender.

### **WHAT IS THE PROBLEM?**

The Institute is sceptical of the rationale for this project. What is the problem that needs to be solved? If the existing facilities 'have limitations in their ability to service the contemporary exhibition and convention industry', why is the demolish/rebuild strategy considered the only way of rectifying the situation?

We also consider that the scope of the project is unnecessarily limited. This is an opportunity to re-consider the whole of the precinct, from the National Maritime Museum in the west to King Street Wharf in the east, at least from a planning perspective. A thorough analysis of the larger precinct would have enabled long-term strategies to be developed that could be implemented over a 20-30 year period.

The proposal has all the characteristics of a knee-jerk 'quick fix' reaction to convention industry concerns rather than a calm, rational analysis of the long-term future use and development of this major public precinct. A more thoughtful and measured approach to the perceived problem could have yielded analysis to inform a much better solution than the one that is proposed - and at less cost and within the same time-frame.



## **THE RE-DEVELOPMENT OF DARLING HARBOUR**

The Institute welcomes the proposal to re-develop Darling Harbour as an opportunity for the refurbishment, renewal and revitalisation of this important urban precinct.

Alterations are needed so that the key spaces in the existing buildings are able to meet 21st century requirements and increased use. The Institute supports the enhancement of the precinct to achieve the expansion and re-configuring of its facilities and improvements in the relationships between the major buildings.

There is an opportunity to re-think the function and design of the Harbourside Shopping Centre, which could provide much better support for the major facilities to its south - the Convention and Exhibition Centres.

The Institute welcomes the proposal to remove the monorail, a poorly functioning piece of infrastructure whose novelty value has well and truly passed its use-by date. This will enable attention to be paid to improving access to the precinct, particularly from Darling Drive.

The popularity and use of Tumbalong Park could be greatly enhanced by better integrating Darling Harbour with the CBD and with Pyrmont/Ultimo. This would provide social and economic benefits to all these precincts, recognising the significant increase in their residential populations since the completion of the existing Darling Harbour facilities in 1988.

## **THE DEMOLITION/REBUILD PROPOSAL**

In 2012 the Institute's NSW Chapter adopted a new policy: *Valuing Award-Winning Buildings in the Long Term*. The policy proposes a number of actions to achieve the long-term recognition and protection of buildings that have won the Chapter's highest honour, the Sulman Medal, including listings on local environmental plans and the State Heritage Register.

The policy aims at the long-term survival of these highly regarded buildings and encourages adaptations and additions that respect the integrity of their original designs.

In view of this policy, the Institute strongly advocates the retention of the Sulman Medal-winning Exhibition Centre in any re-development of Darling Harbour. We also recommend the retention of the other major buildings in the precinct and the key features of Tumbalong Park.

Demolition/rebuild is both an inappropriate and out-dated strategy in this instance. Retaining the essential structures in Darling Harbour makes sense from a sustainability perspective; the embodied energy in their building materials has a potential life well in excess of their 25 years. The development application for the proposal is highly deficient in this regard; while acknowledging that 'it is in the Consortium's interest to re-use the existing infrastructure as far as possible' no analysis is provided that enables a comparison of the costs of retention/adaptation and demolition/replacement.

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Adaptive reuse and refurbishment will enable the continuing use of parts of the buildings and the staging of the construction process throughout the whole of the re-development period. It also enables creative design responses that will enhance the qualities of the existing buildings while upgrading them to meet current and potential convention and exhibition requirements.

The public has not been advised why demolition is necessary; no cost-benefit analysis of demolition vs. adaptation has been made available.

In addition, the Institute argues that, where public land is concerned, a financial cost-benefit analysis is only one component of a broader analysis of the competing benefits of demolition vs. adaptation from social, cultural and urban planning perspectives. This analysis is the responsibility of Government.

The SICEEP proposal for the Darling Harbour precinct is radical, even revolutionary. At Barangaroo the Government is managing the renewal of a site where the previous maritime uses have been abandoned; in the case of Darling Harbour, however, the proposal is to replace 25 year old buildings with new buildings that will serve the same purposes on similar footprints.

### **THE PLANNING PROCESS**

Darling Harbour is a large precinct on public land that includes public parkland. There needs to be a publicly accountable process for managing the re-development of the area that includes a central role for the government in master planning, particularly in maintaining and enhancing the public domain.

As was the case in Barangaroo the Government has transferred its responsibility to undertake the planning for this public precinct to the private sector through the PPP process.

The Institute recognises that the private sector will be involved in large-scale projects of this nature. But its participation should be invited only after rigorous preparatory work by government.

The role of government must be to first determine the future public benefit that can be derived from the site. It must set urban design guidelines to underpin the configuration of the site (and particularly the public domain) and undertake due diligence studies of heritage, contamination, transport, pedestrian connections and similar broad-scale planning issues and should prepare a master plan factoring in this advice alongside the needs of the tourism and convention industries.

The Institute notes the urban design and public realm guidelines produced by Infrastructure NSW to guide the planning process for the SICEEP project. But this document is limited to laudable but limited generic advice to the private sector. It has not been used to guide a precinct master plan prepared by government.

The community should have a voice in plans to develop public land. A public domain plan should also clearly differentiate the public and private realms.

Public space is a signifier of democracy. It is vital that the government retains stewardship of the community's places. It should show leadership in a sustainable future for Sydney.

As was the case with the Barangaroo South project the Institute does not take issue with the quality of the professional teams involved in the proposed re-development; what we question is the brief to which they are responding and the out-dated and wasteful demolish/rebuild strategy underlying the whole proposal.

The appointment of a steering committee and design review panel to advise on the project is welcome, but not sufficient to allay the Institute's concern that the planning process is fundamentally flawed. Governments should not abdicate their responsibility to properly plan the development of public land.

## **THE DEVELOPMENT APPLICATION**

As was the case with Barangaroo South, there is a plethora of documentation supporting the application - but nowhere is there a short straight-forward document that pulls all the key arguments together to enable an interested member of the public to reach an informed decision on the application.

The application therefore fails to meet the most basic requirement for adequate public consultation - it does not clearly explain what is proposed and why. Even though there is a separate Concept Proposal entry on the Department website listing State significant applications the application is a form document that presents only the most basic identity of the project. No argument is presented for the efficacy of the project.

## **COMMENTS ON SPECIFIC COMPONENTS**

### Built Form and Public Realm Report

The history of the site mentions the Sulman Medal won by the Sydney Exhibition Centre (p 14) but this does not trigger any analysis of the building's significance in the report or the heritage impact statement.

Existing Infrastructure (p 27) is instructive. It acknowledges the Sulman Medal won by the Exhibition Centre and awards won by the fountain designer, architect Robert Woodward. It claims: 'given the procurement method, it is in the Consortium's interest to re-use the existing infrastructure as far as possible...' but no analysis is provided that enables a comparison of the costs of retention/adaptation and demolition/replacement. This is a major deficiency in the report.

The overall precinct strategy (pp 28-35) re-states the qualities of the current facilities and existing connections between the precinct and the rest of the city. There is no

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attempt to separate the present from the future or to present an analysis clearly stating the benefits of the proposed enhancements over existing arrangements.

The excision of the Harbourside building from the precinct analysis is a fundamental weakness, as it is arguably the least successful of the existing facilities. It also forces awkward design solutions for the hotel to the north of the new convention building. There is no acknowledgment of the reason for this excision - the current ownership of the building. It also results in a reduction of public space in the Waterfront precinct. The traffic overpasses are similarly ignored, despite their impact on the amenity and extent of the public domain in the precinct.

The claims in Design of the Public Realm (p 33) are excessive, considering the proposed 15% increase in the total public realm. This section should have included analysis and consideration of the relationships between the proposed precinct and the public realm of the Darling Quarter in graphic form, particularly the 30m wide public street introduced between the two buildings in that development. It is not enough to declare connectivity between the precinct and the rest of the city; it must be demonstrated in graphic form. The exclusion of neighbouring precincts from the report drawings is a major flaw that weakens its arguments claiming greater connectivity with them.

The statement '...the design proposal will ensure that a distinctively Sydney experience is provided for all who visit the precinct...' implies that the precinct does not currently provide such an experience. Yet one of the most successful features of the Sydney Exhibition Centre is the nautical character of its masts, reflecting the precinct's nautical past.

If the vision for the SICEEP project is 'to provide an acknowledged convention, exhibition and entertainment facility of international quality for the people of NSW' (p 34) the report does not prosecute the case for entirely new buildings as opposed to the extension and modification of the existing facilities on the site. 'A compelling destination for an international audience' (p 34) could arguably be more successfully achieved by the enhancement of existing internationally recognised buildings rather than their replacement.

Invoking the example of Barcelona's La Rambla in describing the Boulevard (p 36) is spurious and overstated. The Barcelona street borders the fine grain density of the Barri Gòtic and links Port Vell to the Eixample district. The Boulevard, by contrast, links UTS to the southern edge of Darling Harbour and borders monumental buildings on one side and the park on the other. It is in no way an urban street comparable with La Rambla.

The report comfortably embraces the 'redesigned and expanded' Tumbalong Green Park (p 37) but fails to embrace a similar concept for the treatment of the existing built facilities in the precinct.

While opportunity to 'improve the quality of Darling Drive' (p 41) is welcome, street planting by itself will not solve the present problem. The street has the character of a

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large scale functional back lane - between the rear of the convention and exhibition facilities on one side and a multi-storey car park on the other. The problems of street address require a more fundamental re-thinking of its function in relation to the precinct as a whole.

The acknowledgment of the international excellence of the Woodward Tidal Cascade fountain (p 50) is welcome; it is regrettable that this respect for the precinct's existing features (together with Tumbalong Park and the Chinese Garden) is not carried through consistently to embrace the existing buildings as well.

The engagement of Leon Paroissien as the project's art consultant (p 52) is also welcome, and promises the commissioning of dynamic contemporary public art for the precinct.

#### Heritage Impact Statement

The statement does not observe the basic procedural requirements proposed in the Heritage Branch publication Statements of Heritage Impact, the primary guideline for the preparation of such documents. It does not properly analyse each element of this large precinct and specifically avoids analysing the arguments for demolition.

The document claims to follow the methodology of Kerr's The Conservation Plan and the Australia ICOMOS Burra Charter, yet it fails to analyse the heritage significance of the three key buildings in the precinct.

The statement takes the narrow view of the definition of heritage items, i.e. those that are listed on statutory registers. It does not capture non-statutory listings by organisations such as the Institute and the National Trust, yet these lists are the basis for many of the statutory listings. The statement is therefore not an accurate analysis of heritage impacts in the wider sense.

The statement has some major omissions - there is no mention of the listings of the Convention and Exhibition Centres on the Australian Institute of Architects NSW Chapter's Register of Significant Architecture, nor is the Register listing mentioned in the analysis of the Woodward water feature. The Exhibition Centre's engineering and tourism industry awards are also omitted.

Similarly, while the NSW Chapter's Civic Design Merit Award for the water feature is cited, no mention is made of the Sulman Medal won by the Sydney Exhibition Centre, yet this is the Chapter's highest accolade.

While noting the Heritage Council's agreement to recommend the listing of the Darling Harbour Water Feature on the State Heritage Register it fails to mention that an application for the listing of the Sydney Exhibition Centre was being considered at the time the SOHI was prepared - February 2013.

Page 3 of the statement uncritically quotes the SICEEP mantra:

'The existing convention, exhibition and entertainment centre facilities at Darling Harbour were constructed in the 1980s and have provided an excellent service for Sydney and NSW.

The facilities however have limitations in their ability to service the contemporary exhibition and convention industry which has led to a loss in events being held in Sydney.'

This is inadequate as part of an independent analysis that is meant to provide objective advice to the consent authority. The demolition is a proposal made by the commissioning client. It should be the subject of rigorous analysis.

While acknowledging in the short history (Page 21) that the Darling Harbour re-development of the 1980s was comparable with the rehabilitation of inner city precincts around the world at that time this is not treated as sufficient reason to examine the significance of the precinct's built elements in their present day context.

While neglecting to consider the heritage significance of the Exhibition, Convention and Entertainment Centres the SOHI quotes statements of significance for heritage items in the adjoining precincts.

The statement fails to list the references consulted in its preparation, which should have included *Sydney Architecture* (Graham Jahn), *Australian Architecture Since 1960* (Jennifer Taylor) and the international publications *Twentieth Century Architecture: a visual history* (Dennis Sharp) and *A History of Architecture* (Sir Bannister Fletcher) and numerous journal articles, all of which acknowledge the significance of the Cox building.

#### Stakeholder and Community Engagement Report

The report's Executive Summary includes the following statement:

'The prevailing character of the area is intrinsically connected to its maritime environment and more recently its industrial heritage; with an identity that has been influenced over time by layers of commerce, trade and entertainment.

The planned regeneration of the Darling Harbour as an events and entertainment precinct over the last twenty five years has been a catalyst to its gradual transformation into a hub for education, innovation, media and creative industries, a trend that is gaining momentum'.

This makes a persuasive argument for the very strategy the Institute is proposing - maintaining and expanding the existing facilities as a link between the precinct's past and future.