

8 December 2017

Director Key Sites Assessments, Planning Services
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Director,

Art Gallery of New South Wales Expansion – Sydney Modern – State Significant Development (SSD) 14_6471

National Trust representatives have received a number of briefings at the Art Gallery of NSW by the Sydney Modern Project Team, its consultants and architects and thanks the Art Gallery of NSW for this opportunity. There have been a number of improvements as the plans have progressed and some of the Trust's criticisms appear to have been taken on board.

However, the Trust firmly holds the view that the updated Conservation Management Plan for the Royal Botanic Gardens & Domain should have been made publicly available before any Development Application was lodged. This CMP would then have informed the Development Application and associated documentation such as a Heritage Impact Statement and Environmental Impact Statement. This view was put to the Art Gallery of NSW on several occasions but the Development Application was lodged without an accompanying Conservation Management Plan. In the Trust's view, this is an extraordinary and inappropriate situation.

It is essential that there be a Conservation Management Plan for the Art Gallery Site indicating its relationship, to and in, its context and setting, which includes the Domain and the Royal Botanic Gardens. This "first step in the process" is fundamental as a Conservation Management Plan provides parameters to guide initial decision-making on:

- (1) are there any areas which may be, on further investigation, be appropriate for development;
- (2) what form and scale might such development take;
- (3) what are the likely impacts of such development; and
- (4) how the impacts are to be managed.

The Royal Botanic Gardens, the Domain and the Art Gallery need to be considered as a single entity, with each part being an essential piece in the mosaic of the historic precinct bounded by Macquarie Street, the Opera House, the Harbour, Government House, Woolloomooloo Finger Wharf, the Register General's Department, the Cathedral, the Museum and Hyde Park. This is a Precinct that ought to be declared under the State Environmental Planning Policy (State Significant Precincts) 2005 given that sites such as the Opera House and Barrangaroo are on this Planning Policy.

The Trust also holds the long standing view that there should be no further net loss of open space in the Royal Botanic Gardens / Domain for the construction of new development.

The Heritage Impact Statement prepared by GML Heritage summarises the main impact on the Royal Botanic Gardens and the Domain: -



“The main adverse heritage impacts relating to the Royal Botanic Gardens and the Domain relate to the construction of the proposed Sydney Modern Buildings over a landscaped area of the site....”

The Royal Botanic Gardens and Domain Landscape Conservation Area was listed on the National Trust Register in May, 1976 recognising it as the second oldest botanic gardens in the southern hemisphere (1816) and for containing many important structures and memorials from early Colonial times when it formed part of the Governor's (Phillip's) Domain. The listing noted that the Gardens layout was exceptionally important.

The Art Gallery of New South Wales was listed on the National Trust Register in April, 1979 as forming a substantial cultural landmark in Sydney and for its strongly classical facade of rich detail that has continued the building tradition in the former Governor's Domain of eclectic masonry structures set in park-like settings. The Royal Botanic Gardens and Domain was listed on the State Heritage Register in April 1999. The NSW Art Gallery has not yet been listed on the State Heritage Register and the National Trust has raised this omission with the Art Gallery of NSW and State Government at the highest levels.

The proposed development involves loss of public open space even though the brief for the most recent Management Plan required that there should be no net loss of open space with any new development. There appears to be no clear strategy for mitigating this loss of public open green space. The Trust opposes any loss of public open space.

At the very least the Royal Botanic Gardens Trust needs appropriate and significant contribution for the loss of so much open space and the NSW Government needs to make a public commitment on this as soon as possible.

Comparisons with the National Gallery of Victoria, in terms of floor space, are not necessarily valid as the National Gallery of Victoria is spread over two sites. This raises the question of a new Sydney Modern beyond the Domain / Royal Botanic Gardens or the alternative development of the site to the south-east of the present buildings. It should be noted that Melbourne's equivalent public open spaces to Sydney's Domain have not suffered development pressures. New major building developments should be sited in the Sydney CBD or at a site where vital green space is not compromised.

The Trust continues to urge the investigation of alternate sites for the Sydney Modern proposal such as the 'void' beneath the Barangaroo Headland.

The Trust considers there are major problems with the proposed development in the Domain. These include: -

- The present proposal would result in a significant reduction in the area of “open space” and have major impacts on the presentation and setting of the historic building, especially the ability to see and appreciate the building in the round. The ‘shelter’ structure is intrusive and bears no relationship to the existing Gallery in its form and alignment. It appears to be unnecessarily large and would ‘compete’ strongly with the historic building particularly in the manner in which it impacts on the northern elevation.
- The building on the Land Bridge (Entrance Plaza) and the adjoining building to the north opposite Woolloomooloo Gate (Entrance Pavilion) have a setback of respectively 5.75m and 9.95m from Mrs Macquaries Road. The Entrance Pavilion has a height of between 7m and 8m above the road. These buildings are too close to the road, and by being too far forward, impact on the view cone from the north. The white colour and the large reflective glass windows are too stark for the garden environment. Most importantly the proposal confuses the significant entry experience to the existing building. These buildings should be further set back behind the line of the front façade of the historic Art Gallery building.



- The footprint for the proposal is massive. The “site area” is more than double the existing Art Gallery of New South Wales footprint.

The National Trust recognises that a Sydney Modern proposal would extend the number of cultural assets for Sydney and increases visitation and revenue generation for the NSW Art Gallery. The Trust strongly supports such a cultural and social objective but believes that the proposal should not be sited in the Domain.

The re-use of the former oil depot for functions associated with the NSW Art Gallery is supported by the Trust. However, the current proposal is intrusive, involving the removal of many of the original historic piers. Any redevelopment of this facility should retain all original fabric intact.

The National Trust is concerned that the NSW Government has made no commitment to increase recurrent funding for the AGNSW. Without such a commitment, the proposed expansion could only be sustained by shifting the focus still further towards corporate functions and away from care for the collection and the program.

A commitment of \$244 million in public money towards construction costs appears to have been made without considering the broader cultural needs of the people of the State of NSW. Many cultural institutions remain starved of funds. New South Wales still lacks a dedicated museum of Aboriginal history.

Parramatta remains the only major city in Australia without a public gallery – It would be better for an Art Gallery of NSW satellite to be built in Parramatta and the Powerhouse Museum maintained at its historic and most suitable location in Ultimo.

Yours sincerely

Graham Quint
Director Advocacy