

9 May, 2013

Mr Sam Haddad
Director General
NSW Planning & Infrastructure
GPO Box 39
Sydney NSW 2001

Attention: Mr Matthew Rosel

SSD 5752, Sydney International Convention, Exhibition and Entertainment Precinct - Redevelopment of convention centre, exhibition centre, entertainment facilities and associated public domain works and Mixed use Development in the Southern Haymarket Precinct (Concept Proposal)

Dear Mr Haddad,

The National Trust of Australia (NSW) expresses its strong opposition to the redevelopment proposal for the Sydney Convention Centre, Sydney Exhibition Centre, entertainment facilities and associated public domain works at Darling Harbour.

It is extraordinary that Sydney's Darling Harbour Precinct built to commemorate the 1988 Australian Bicentennial would be under threat of major demolition for redevelopment.

The Darling Harbour site is significant for its archaeological potential, important for the information it may reveal about industrial and technological advances over almost a two hundred year period. This area was where beginnings of industry, the development of technologies and significant transportation facilities in Australia occurred. Part of the area includes Chinatown and thus has cultural significance for the Chinese community whose association with the area extends to c1870s. It is a large site with a diverse history stretching back to pre European settlement. It includes Cockle Bay which was named for the large middens and thus may have indigenous archaeological significance.

IMPACT ON ARCHAEOLOGY AND DGRs

The NSW Heritage Branch in its letter of 21 December, 2012 to the Department of Planning & Infrastructure stated: -

"... it is considered that the following should be included in the amended Director General's Assessment Requirements.

- 1. The Applicant must undertake a highly detailed archaeological assessment which includes a consideration of Aboriginal, non-Aboriginal and Maritime heritage. This archaeological assessment should consider the proposal below ground impacts on any potential archaeology and in addition, consider what archaeological works have already been undertaken on this site which may provide information to aid in this assessment. The assessment should include overlay maps and assessments of significance for the potential archaeological resource utilising appropriate Heritage Council Guidelines such as "Assessing the Significance of Archaeological Sites and Relics". It should also contain mitigation strategies to manage this potential archaeological resource which may include **redesign to avoid significant archaeological testing or salvage during project works.** (National Trust bolding emphasis)*
- 2. A detailed Heritage Impact Assessment 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. It should also include a consideration of wider*

heritage impacts in the area surrounding the site. This assessment should also include detailed mitigation measures to offset the impacts this project may have on the precincts heritage values.

3. *The Heritage Impact Statement should also have regard to any impacts on places, items or relics of significance to Aboriginal people. Where it is likely that the project will impact on Aboriginal heritage, adequate community consultation should take place regarding the assessment of significance, likely impacts and management/mitigation measures.*
4. *The Applicant must ensure that an outline of the on-site heritage interpretation plan is undertaken as part of the EIS.*
5. *The interpretation should include all aspects of the sites history and heritage and the Plan should identify avenues for appropriate and innovative public understanding and appreciation of this heritage as part of the completed development.”*

Your Director-General's Requirements stated: -

“Heritage

- *Address the impacts of the proposal on heritage significance of the site and the adjacent area including any built and landscape heritage items including places, items or relics of significance to Aboriginal people; and*
- *Address opportunities for heritage interpretation within the public domain.”*

Consequently, the Trust was deeply concerned that the Archaeological Assessment and Impact Statement for the development indicates that the proposed redevelopment involves “additional piling” which “is likely to impact on the dismantled pieces of the 1874 Iron Wharf, the 1865 and 1876 stone seawalls and associated reclamation.”

A response from Lend Lease to media enquiries on this issue indicated that Lend Lease would “manage the impact on Archaeological items during construction”. Whereas Lend Lease should have given assurances that it would avoid impacts on archaeology through redesign to avoid significant archaeological testing or salvage during project works.

Earlier construction was clearly able to overcome major obstacles in the design process with the 1999 Ken Woolley Link Building constructed around and physically and acoustically isolated from the supporting piers of the overhead expressway.

THE SIGNIFICANCE OF THE DARLING HARBOUR PRECINCT – THREE WORKS OF MAJOR AUSTRALIAN ARCHITECTS

The significance of the Darling Harbour redevelopment was the transformation of the derelict 54 hectare industrial harbour front site into an inner city entertainment area - a new **“place for people.”** NSW Premier Neville Wran's vision for Darling Harbour was part of his wider philosophy of making Sydney accessible to ordinary people, enhancing the culture and general quality of life in New South Wales.

Darling Harbour on the western edge of the Sydney CBD was the centerpiece of the NSW Government's program for the 1988 Bicentenary celebrations. Darling Harbour is one of Sydney's greatest urban renewal projects since European settlement.

The significance of the Sydney Exhibition and Convention Centre complex is primarily derived from its continued use as the principal NSW venue for events, exhibitions and conference attracting and enjoyed by a large audience of Sydney residents has been the venue for many major exhibitions including the Skills Olympics 1988, and visitors from Australia and the world. More significantly, the Sydney Exhibition and Convention Centre complex was the backdrop for the official opening of Darling Harbour by Her Majesty Queen Elizabeth in May 1988. Since then it First State 1988, the Sydney Bicentennial Fair and many lifestyle exhibitions. The Sydney Convention and Exhibition Centre at Darling Harbour was a venue of the Sydney 2000 Olympic Games and a key meeting venue of APEC Australia 2007.

The **Sydney Exhibition Centre** was the first major exhibition centre to be built in New South Wales since the

Garden Palace of 1879. The Garden Palace was destroyed in a fire in 1882, leaving Sydney without an international standard exhibition facility for over a century.

The **Sydney Exhibition Centre** opened in January 1988 as part of the Australian Bicentennial celebrations, is of National heritage significance as an excellent example of a Late Twentieth Century Structuralist public building. It is an important work in the career of the prominent Australian architect Philip Cox AO, who continues to play a significant role in Australia's cultural history. The Sydney Exhibition Center is critically acclaimed nationally and internationally as a significant example of Twentieth Century architecture, demonstrating a high level of creativity in its concept and of integrity in its execution. In 1989, it was awarded the Sir John Sulman Medal RAIA (NSW Chapter) by a peer Institute committee chaired by Harry Seidler. In the same year it was a finalist for the Sir Zelman Cowan Award. Philip Cox received the Australian Institute of Architects' Gold Medal in 1984 & in 1988 he was awarded the Order of Australia for services to architecture.

Sydney Convention Centre (Bayside) on the Waterfront Promenade, Darling Harbour, dating from 1988, is a high quality example of a major public building designed by a leading Australian architect in the Late Twentieth Century Late Modern style and is acknowledged as an aesthetically distinctive and robust design. Now known as the Bayside Wing, the Centre was designed for the 1988 Bicentennial by John Andrews AO of John Andrews International who received Australia's most prestigious architectural award, the Australian Institute of Architect's Gold Medal in 1980. Sydney Convention Centre is of aesthetic significance through its association with architect John Andrews AO who was the first Australian architect to achieve major success internationally and this building is regarded as the best surviving example of his work in Sydney. *The Sydney Convention Centre is home to a unique collection of paintings.* The majority were commissioned or purchased by the former Darling Harbour Authority as art representative of Australian painting at the time of the Australian Bicentenary in 1988. Many artists who were commissioned for the 1988 collection accepted only a token fee for their work in recognition that their work would become integral to the Darling Harbour project and a gift to the community. The collection has a strong Sydney emphasis through the number of artists who were recognised at that point in time as having a particular affinity with Sydney. In addition, where paintings were commissioned, the artists were requested to respond in some way to Sydney, its harbour and its maritime atmosphere. There have been some additions to the collection since 1988.

"Parkside" **Sydney Exhibition and Convention Centre "Link" Building** at Darling Harbour has high aesthetic significance with its ballroom foyer and its long, cantilevered glass façade emerging from the cavernous depths of the expressway void and appearing to float above the lawns and paving. The "Link" Building has high design and technological significance in its response to an extraordinarily challenging site, with its frameless, sloping and angled cantilevered ballroom foyer glass façade forming a bold counterpoint to the massive concrete monoliths above and the freeway concrete columns incorporated into the new building but hidden from view within stone-clad walls.

As the last of the major Darling Harbour Development constructions, this building has historic significance as the final component of the original Bicentennial development and through its use for the 2000 Sydney Olympics. Now known as the Parkside, the "Link" Building was designed for the 2000 Sydney Olympics by Ken Woolley AM of Anchor/Mortlock/Woolley who received Australia's most prestigious architectural award, the Australian Institute of Architects' Gold Medal in 1993.

The three buildings which comprise the Sydney Exhibition and Convention Centre are among the finest works of three of Australia's most distinguished architects, recognised world-wide. It is telling that their works overseas have been properly recognised, respected and conserved whereas in their own country, they are regarded as expendable.

There is also the question of the sheer waste from a basic conservation viewpoint of pulling down these major works and re-building after such a relatively short period.

There appears little doubt that modifications to the existing buildings, in consultation with their architects would produce an acceptable result in terms of the project's objectives. Surprisingly the development produces relatively little increase in exhibition and convention space and capacity and in the case of the Entertainment Centre results in a considerably smaller facility than the often sellout capacity of the existing building.

THE HERITAGE SIGNIFICANCE OF THE EXHIBITION AND CONVENTION CENTRE BUILDINGS

The Director General's Requirements to "address the impacts of the proposal on heritage significance of the site and the adjacent area including any built and landscape heritage items..." has been addressed far too narrowly in the Statement of Heritage Impact.

The Statement of Heritage Impact ignores and does not include the non-statutory listings by the Institute of Architects' Register of Significant Architecture in New South Wales and the National Trust Register.

The Woodward (Spiral) Fountain is referenced in terms of a decision by the State Heritage Register Listings Committee to recommend its listing on the State Heritage Register.

However, the Trust understands that the 10 April Meeting of the State Heritage Register Listings Committee recommended the Sydney Exhibition Centre for Listing on the State Heritage Register.

The following places have been listed on the National Trust Register: -

- The Sydney Exhibition Centre, (Philip Cox Richardson Taylor and Partners Pty. Ltd, 1987)
- The Sydney Convention Centre (John Andrews, 1987)
- The South Complex 'Link' Building (Ancher, Mortlock, Woolley, 1999)
- The Woodward 'Spiral' Fountain (Robert Woodward, 1987)
- The Chinese Garden of Friendship (1987)
- Darling Harbour Non-Indigenous Archaeology (1815 – 1899)
- The Carousel (c1893)
- Tumbalong Park & Landscaping (1987) (draft listing)

Copies of these listings are attached.

The Trust urges that the heritage significance of all of these items be properly recognised and that the impacts of the proposed development on those heritage values fully assessed as required in the Director-General's Requirements.

The Trust also notes that the Australian Working Party for documentation and conservation of buildings, sites and neighbourhoods of the modern movement (DOCOMOMO) has nominated "**DARLING HARBOUR – A Place for People**" **Darling Harbour, Sydney, Australia**" to the International Council on Monuments and Sites (ICOMOS) International Scientific Committee on Twentieth Century Heritage (ISC20C) for an International Scientific Committee on Twentieth Century Heritage (ISC20C) Heritage Alert.

A copy of the Heritage Alert nomination letter and the ICOMOS Heritage Alert Template is attached.

HARBOURSIDE SHOPPING CENTRE

But a key issue which has not been addressed in the development proposal is why the **Harbourside Shopping Centre** was not included in the SICEEP scheme. The Harbourside Festival Marketplace on the west side of

Cockle Bay was designed and constructed to provide a place for entertainment and shopping. It contains over 24 bars, restaurants, food outlets and retail outlets. Modelled on the festival markets of Baltimore, the Harbourside marketplace was decorated with distinctly Australian artworks of more than 30 of Australia's artists, muralists, designers and craftspeople. It is an undistinguished building based on a Baltimore design.

The incorporation of the Harbourside Shopping Centre in the SICEEP scheme would have provided the necessary flexibility which would have allowed for a redevelopment and facility expansion which may not have required the extensive demolitions proposed.

THE CHINESE GARDEN OF FRIENDSHIP

Although not within the SICEEP scheme boundary, the Chinese Garden of Friendship directly adjoins the development and the planned landscaping redesign of the courtyard at the entrance to the Garden and Tumbalong Park.

As a key tourist attraction and a garden recognised worldwide as one of the few authentic Chinese Gardens beyond the Chinese Mainland it would have been expected that consultation with the Chinese Community who conceived and guided the Garden's construction would have been undertaken and particularly the Feng-Shui principles in relation to the proposed development and landscaping.

The Trust's own consultation with the Chinese Community indicates that this appears not to have been considered. This is a remarkable oversight given the importance of the Garden to the Chinese community, tourism and investment funding from China. There are needs for large open public spaces for gatherings and events. The proposal to landscape this area appears to be ill conceived and would restrict the area's use by the public as intended in the original design at the time of the Bicentenary.

1855 DARLING HARBOUR GOODS LINE

The Ultimo Rail Corridor was constructed from 1853 through to 1911 and is part of the Railway Square to Powerhouse line. This line is one of the oldest active extant railway tracks. The rail link is free from development, it is used for the light rail through Pyrmont from north of Hay Street. Archaeologically the site holds potential for evidence of the remains of 1897 buildings and the remains of a brick lined water tank.

The Darling Harbour goods line was part of the first railway opened in New South Wales in 1855, the current corridor corresponding with that purchased from the Harris family in 1853 for this purpose. It therefore has a high degree of significance as a place. Future development should respect the definition of the space, allowing for its interpretation as a former railway corridor.

The Trust is concerned that the Exhibition Centre loading dock will extend over a part of the Railway Corridor. The Rail Corridor should not be affected by this development and there should be no alienation of the rail corridor.

CONCLUSIONS

It is apparent that, in the case of the Sydney Entertainment Centre, the new facility decreases the seating capacity for a vital facility that is regularly fully booked. For the other facilities there are reasonable alternatives for extension and adaptation rather than the demolish and rebuild approach being suggested.

Importantly, the Harbourside Shopping Centre should be included in the development precinct as this site would allow greater flexibility in the development design obviating a perceived need to demolish so much of the historic 1988 Bicentennial Development.

The Heritage Significance of the Precinct, its buildings, landscaping and archaeology would be severely impacted by the proposed development and its associated demolitions. Demolition of the Sydney Exhibition and Convention Centres would be a poor planning decision and would send a clear signal that the modern works of some of our greatest, world-recognised architects are not valued in their own country. The Trust believes that there will be impacts on the Chinese Garden of Friendship and that the Chinese Community has not been properly consulted.

It is also apparent that the general public are mostly unaware of the proposed changes to Tumbalong Park and its landscaping and that this work is both unnecessary and damaging to a well-loved public facility. Darling Harbour was developed in 1988 as a "Place for the People" and the current proposal does not respect this concept nor the values that the community now place on the area.

From a heritage recognition and conservation viewpoint this development proposal is disrespectful and destructive and the development concept appears to be ill-considered and unimaginative given the alternatives available.

Yours sincerely,



Graham Quint
Conservation Manager