

19 August 2015

Mr Anuj Saraogi
Project Manager
Major Projects Assessments
NSW Planning & Environment
22-33 Bridge Street
SYDNEY NSW 2000

Dear Mr Saraogi,

**State Significant Development Application – Crown Sydney Hotel Resort (SSD 6957),
51a Hickson Road, Barangaroo**

Thank you for the invitation to the National Trust to comment on this development proposal and for providing the Trust with the Architectural Design Statement and Environmental Impact Statement for the Crown Sydney Hotel Resort at 51a Hickson Road, Barangaroo.

The National Trust lodges its objection to this development proposal for the reasons outlined below.

Modification 8 will have a dramatic negative impact on the heritage significance of Millers Point, the Observatory and Observatory Hill. The floor space on this land which was owned by the public has increased by some 80% and the height has been increased with no discernible improved public benefit. There is no justification for this increased floor space or increased height.

In its June 2010 "Barangaroo – The National Trust Alternative Concepts" submission to the NSW Government the Trust set out a number of design principles for Barangaroo, following a comprehensive examination of the heritage attributes of the area: -

- Primacy be given to the maritime, ecological, recreational and aesthetic functions of the harbour;
- Privatisation of the harbour be prohibited;
- The form and function of the headland acknowledge the rich archaeological and maritime history of the area while maximizing open space;
- Public and private domains be physically delineated to clearly demarcate boundaries with a view to protecting the community's right of way to the harbour;
- Public land be permanently dedicated and reserved to protect it from subsequent development proposals; and
- The NSW Government increase transparency and accountability associated with the Barangaroo development.

It is only with the last design principle that some headway can be recognized and the Trust acknowledges and thanks NSW Planning & Environment for supplying the full documentation on this development proposal to the Trust and for seeking our comments.



The Trust's main objections to the earlier hotel proposal in Sydney Harbour were in response to the attempted "privatization" of the Harbour. The current proposal is actually worse than the earlier proposal (the ninety metre pier jutting into Darling Harbour).

At 275 metres in height it is 116 metres taller than the earlier hotel proposal, an increase in height of 73%. It is closer to historic Millers Point and abuts the line that was drawn in the 1970s to demarcate The Rocks and Millers Point from skyscraper development.

Even worse, it appears to be the tallest building at Barangaroo, closest to Millers Point where building height was meant to gradually reduce/scale down. This is a standard heritage protection procedure where the interface between commercial development and Historic Conservation Areas has buildings of lower height to achieve a gradual transition.

Despite its State Heritage and almost certainly National Heritage Significance, in this instance, this key urban design and heritage conservation principle has been abandoned. The 2010 Barangaroo Concept Plan clearly indicated this original intention for buildings to step down in height progressing northwards with Building Block C3 at 209 metres, then Building Block 4B at 175 metres and finally Building Block 4C (the northernmost) at 160 metres.

This proposed new development is wholly sited within the area originally proposed in the 2007 Barangaroo Consolidated Concept Plan as the Foreshore Promenade – "The Concept Plan provides the missing link to the 14 kilometre foreshore promenade that reaches from ANZAC Bridge in the west to Woolloomooloo in the east of the site. The street and park edges enshrine the western foreshore of the city as inalienable public land."

Not only does the proposed hotel/resort usurp the designated public open space on the harbour foreshore but it relegates the parkland to the area behind the building and it totally blocks views northward along the South Promenade and partly blocks view northwards from the southern section of Lime Street.

The Barangaroo planning process has been an extraordinary cascade of modifications each increasing building heights and floor space ratios and decreasing public open space. The current Hotel Resort Proposal, while being more of the same, is contemptuous of the principles of orderly planning, heritage conservation and "inalienable" public open land.

The 2007 Concept Plan set aside approximately 11 hectares of new public open space / public domain. The Concept Plan provided that 50% of the site was to be publicly accessible open space, generally a mix of grass and treed parklands with a range of footpaths and viewpoints. This is in addition to the streets and public spaces in the mixed use development zone.

The Barangaroo Delivery Authority's website makes the following statement on its public space commitment at Barangaroo -

"50% of the entire 22 hectare precinct is dedicated to public space. Barangaroo includes a six-hectare headland park located at the northern end of the precinct where it meets Millers Point. A further three hectares of public space on the Central Barangaroo waterfront will provide areas"

This leaves two hectares of open space unaccounted for. This point was raised by Sydney City Council in its submission on the Modification Request for the Barangaroo Concept Plan (MP06_0162 MOD 8): -

"The modification includes an increased width for Globe Street and the introduction of a new vehicular road to service the casino/hotel tower. These new roads are included in the calculation for public open spaces but effectively represent a reduction in the amount of usable public open space. Roads and laneways are not to be counted as public open space, nor the former hotel wharf which is proposed to have a building of undetermined use erected on it. If



they are included, the amount of public open space is clearly less than the committed 50% of the site – a cardinal objective of the overall development from the beginning.”

Sydney City Council consequently recommended –

A true calculation of usable public open space (not including vehicular roads or the wharf) should be provided to make clear the reduction of open space that accompanies MOD 8.

The 2007 Concept Plan proposed a total of 338,800 square metres of gross floor area.

The latest of the series of modifications to the Concept Plan now proposes 605,911 square metres of gross floor area, an increase of 79%. Little wonder that the 50% (11 hectares) of public open space appears to have diminished. The Meredith Sussex and Shelley Penn *Barangaroo Review* in August 2011 noted that “500,000 square metres or more of floor space would be acceptable at Barangaroo but only if accompanied by additional public benefits.” We now appear to be witnessing a proposal for more than 600,000 square metres of floor space with the planned hotel sited on public open space and the promised eleven hectares of public open space in grave doubt.

With final stages of planning for Central Barangaroo (and further modifications to the Concept Plan likely to occur), even the future of the proposed three hectares of open space on the Central Barangaroo waterfront is not guaranteed.

The proposed development is described as a “landmark”, an “iconic design”, a “sculptural form”, a “habitable piece of artwork”, a “striking image against the sky” and “as the tower rises the petals twist, maximizing the façade exposed to the primary vista of the Harbour Bridge and the Opera House”.

All of this could be acceptable were the building not a private hotel/casino development directly adjoining the Harbour on land originally designated as public open space. Buildings located in these very special locations should be public buildings (like the Sydney Opera House) or should at least provide public viewing areas on their upper floors, not private “Super Villa” and “Sky Villa” luxury apartments.

Of the tower’s proposed 70 storeys, the public will never have access above floor 22 of the “standard hotel”; beyond that are the VIP gaming and luxury apartments. The Trust must question why an essentially private residential tower is being considered in such a location?

The Trust also reiterates the concerns expressed in its 1 May 2015 submission on the Modification Request for the Barangaroo Concept Plan (MP06_0162 MOD 8):-

- The views to the south-west from Observatory Hill Park will, in the Trust’s view, be significantly adversely affected by the development which will be facilitated by the Concept Plan modification. Figure 42 in the Statement of Heritage Impact does not even indicate the full height of the proposed hotel tower.
- The Statement of Heritage Impact does not give a “statement of heritage impact” of the tower development on the views south-west from Observatory Hill Park but merely indicates that the trees and topography of Observatory Hill Park will assist in lessening impacts of the Concept Plan on the views. Whether that lessening of the impacts be by 1% or 2% or 50%, is not assessed.
- The National Trust shares the concerns expressed by the Sydney Observatory regarding the impacts of the proposed new buildings on their highly active astronomy program which attracts over 180,000 visitors annually. The view of several important night sky objects will be obstructed by the proposed new buildings at certain times of the year:
 - The Southern Cross
 - The Pointers



- The Jewel Box Cluster (open star cluster)
- Centauri (globular star cluster)
- The Sydney Observatory Sky View Impact Assessment does not attempt to rebut these impacts but tries to argue that there is more sky left to view and that on rainy nights there is no viewing possible anyway.
- The National Trust has already made its views known to the Department about the seemingly endless modifications that keep flowing with developments such as Barangaroo, each increasing the development density and height and which confirm the inherent defects in the current planning system.
- Rather than gradually stepping down in height as it approaches historic Millers Point, the new Barangaroo Concept Plan Modification seeks to achieve the opposite and grows from 180 metres at the southern end to 275 metres at the northern end. This is put forward with meaningless arguments such as "bookending" or creating a "landmark".
- True landmarks such as the Sydney Opera House, or hotels such as the Savoy in London or Raffles in Singapore, achieve this status through their excellence in design and illustrious history. Height per se is not the yardstick.

Since making its May, 2015 submission the National Trust has been notified that the Barangaroo Delivery Authority has been granted approval to demolish the last landmark remnant of Darling Harbour's maritime history, the Harbour Berthing Control Tower at Millers Point.

This is despite the Heritage Council of New South Wales accepting the National Trust's nomination for State Heritage Register Listing of the Tower and the Heritage Council's recommendation to the Minister for Heritage that it be listed.

On the one hand the Barangaroo Delivery Authority is determined to demolish what remains of Millers Point's maritime history which could have been used by the public to enjoy magnificent views of their harbour while facilitating a massive new tower in a totally inappropriate location intended for the exclusive use of a small minority.

The French writer Guy de Maupassant reportedly ate lunch in the Eiffel Tower's restaurant every day because it was the one place in Paris where the tower was not visible. While this landmark has evolved to become a symbol of Paris now visited by 250 million people, the Crown Sydney Hotel Resort's high visibility from so many parts of Sydney will not achieve a similar legacy because of its inherent exclusivity.

Sydney deserves better than this. The Barangaroo Delivery Authority needs to seriously rethink its role and the proponent of this development should consider re-siting the Crown Sydney Hotel Resort to land zoned for urban development north of Globe Street and East of Lime Street, or a position in the traditional Sydney Central Business District, away from the Harbour-side designated as public open space.

Yours sincerely

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Chief Executive Officer

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Director, Advocacy