

14 February 2017

Mr Ben Lusher
Director - Key Site Assessments Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Lusher,

The National Trust of Australia (NSW) lodges its strong objections to the Staged Development Application (Concept Proposal) for a new retail shopping centre, residential apartment tower and public domain improvements (Redevelopment of the Harbourside Shopping Centre).

It is disingenuous that the "Overview of the Project" in the Architectural Design Report never mentions the proposed height of the new building on this site but rather states a maximum total Gross Floor Area (GFA) of 87,000 sq. metres, a concept and figure that would be meaningless to the general public. Considerable searching through the documentation reveals a proposed tower of 166 metres in height directly beside the western end of Pyrmont Bridge.

The Heritage Impact Statement concludes: -

"It is concluded that whilst the proposed redevelopment of the site will have a visual impact on the immediate setting of the Pyrmont Bridge and its surrounds, it is not dissimilar to the setting which already exists on the opposite, eastern side of the bridge – where the bridge surrounded by office towers- is still readily understood and appreciated within its setting."

This is a masterful understatement. The proposed development will certainly have a (major) visual impact on the setting of Pyrmont Bridge. The dominance of office towers on the eastern side of the bridge is given as a precedent. The conclusion seems to suggest that the office towers somehow enhance its setting (*the bridge is still readily understood and appreciated within its setting.*)

In reality, the bridge and Darling Harbour itself is being trivialised by the enormity of the tower development on the harbour foreshores, in the same way that the Meriton Tower in Parramatta now makes the adjoining Parramatta River appear to be a narrow canal.

The Harbourside proposal has a glass bridge taking out some of the Bridge stone balustrade and the Cockle Bay tower is replacing a pedestrian bridge with a ramp that covers much of the eastern side of Pyrmont Bridge.

The National Trust has long recognized the importance of the foreshores of Sydney Harbour, its associated waterways and Parramatta River. The Sydney Harbour Landscape Conservation Area was listed on the National Trust Register in September, 1982 and the Middle Harbour and Parramatta and Lane Cove Rivers Landscape Conservation Areas were listed on the National Trust Register in January, 1983. All these listings urged the maintenance of strict controls to protect the scenic and cultural values and natural beauty of the foreshores.



As early as 1828 steps were taken to protect waterway foreshores. In Governor Darling's tenure, an August 21, 1828 Government Notice from the Colonial Secretary's Office stated that *"The Government will further reserve to itself all land within one hundred feet of high water mark, on the sea coast, creeks, harbours and inlets."*¹

Sydney Harbour is world renowned for its bushland headlands and foreshore parks and its international reputation is intimately associated with its scenic harbour vistas. However, massive tower development originally confined to the centre of the Central Business District is now being sited on the foreshores. Such development is impacting negatively on one of the world's greatest harbours and inexorably limiting and degrading public access to waterways and their foreshores.

The National Trust reiterates its policy of 34 years calling for the implementation and maintenance of strict controls by appropriate authorities to protect the scenic, cultural and conservation values of the foreshores of Sydney Harbour, its associated waterways and the Parramatta River.

High rise development should not be sited on the foreshores and, where development is proposed, it should of lower scale nearer the water's edge and only stepping higher further from the waterways.

There should be generous foreshore parks established, not just limited public access and narrow walkways and there should be no major overshadowing of foreshore parks and waterways from new development proposed on or near the foreshore.

The Trust rejects the exhibited Concept Plan and calls for new proposals in keeping with the principles outlined above.

Yours sincerely,

Graham Quint
Director - Advocacy