

Director, Key Sites Assessments,  
Planning and Assessments,  
Department of Planning, Industry and Environment

***SSD 7874 – Amended Concept proposal for the Harbourside Shopping Centre redevelopment***

This submission outlines our **objections** to the proposal. They are discussed below.

The response to our original submission of 25 January 2017 was not very satisfactory; it seems only to have evoked formulaic recitals of vague concepts rather than effective rethinking of the proposal. The amendments that have been made to its prior version are minor as are their claimed merits.

The tower element of the proposal remains an inappropriate response to the locality. We appreciate its commercial attraction, but we dissent strongly from its placement on the foreshore, having regard to its lack of maritime purpose. Harbour foreshore land is limited in availability, and ought properly to be utilised only for public purposes that clearly relate to the Harbour. The tower component of the proposal does not envisage such a pattern of use.

We accept that those who undertake work related to the Harbour may properly be accommodated near it; indeed that was the underlying principle governing much of the initial development at The Rocks. But the use by such workers of the workers' housing there has long been superseded by occupants concerned to capture the scenic amenity of the foreshore, and by commercial enterprises serving them and others in a variety of activities well removed from the practical household requirements of working families.

The tower concept in the present proposal does not offer economically accessible housing for workers. It will still have a deleterious effect on the whole of the Darling Harbour visual and recreational environment, and a similarly adverse impact on the Pyrmont Bridge, while making no discernible positive contribution to maritime activity on and around the Harbour.

The land is the property of the public, but the genuinely public space provision in the proposal remains minor in comparison with the space allocated for private commercial purposes and up-market residential occupancy. Apart from some retail and café-type establishments having their primary direct relevance to occupants of the tower – and perhaps to passers-by - it does not appear that the commercial activity envisaged is directly relevant to the non-local users of the public space to any significant degree.

Overall, the proposal provides 10 times more space for commercial and retail activities than it provides for the waterfront public domain. The residential floor space component of 357 dwellings comprises a maximum of 43% of the overall development. Those proportions bring into sharp focus the question of why the NSW Government retains ownership of the

land at all; at present it appears to be viewed mainly as a source of revenue, not as a public asset having any special/unique environmental and heritage qualities in relation to its Harbour-side location.

With the Australian Government currently undertaking reviews of its own legislative arrangements for Sydney Harbour Federation Trust lands about the Harbour as well as its land acquisition and its environmental protection and biodiversity conservation legislation, it is singularly unfortunate that the NSW planning framework cited in the proposal is so obviously biased towards raising the density of ordinary urban development on and around the foreshores of this unique National asset.

The 20-metre promenade is not a real concession to the public; rather, it is needed to provide access by municipal and other service vehicles to the various office/retail/residential activities bordering it. In that respect, it merely echoes the normal 2-lane road/footpath reservation that would be appropriate in an urban commercial zone.

We do not think the proposal should be approved.

Hylde Rolfe, Secretary

(Home: 41 Cove Street Watsons Bay 2030; E: [hylde@bigpond.com](mailto:hylde@bigpond.com); T: 02 9337 5058)

17 April 2020