

28 April, 2020

Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Contact Planner – David Glasgow

Dear Mr Glasgow,

Harbourside Shopping Centre Redevelopment SSD-7874

In a submission dated 14 February, 2017, the National Trust of Australia (NSW) lodged strong objections to the then Staged Development Application (Concept Proposal) for a new retail shopping centre, residential apartment tower and public domain improvements (Redevelopment of the Harbourside Shopping Centre).

The original proposal was for a tower of 166 metres in height, directly beside the western end of Pyrmont Bridge.

The development originally proposed would certainly have had a major visual impact on the setting of Pyrmont Bridge. The Bridge and Darling Harbour itself would have been 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 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, on August 21 1828, a 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."*

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 impacts negatively on one of the world's greatest harbours, inexorably limiting and degrading public access to waterways and their foreshores.

The National Trust reiterates its policy of 37 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 be 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 new proposal includes the demolition of the existing centre, to be replaced with a new shopping centre and a 153-metre tower containing 357 apartments. In the original concept proposal, the tower was located to the north, close to the bridge. In the amended proposal, the tower has been moved further away from the bridge, increasing the setback from 50 metres to 135 metres. The height of the tower has been reduced by 12.6 metres, from 166.3 metres to 153.75 metres.

With the proposal now on exhibition, the Trust welcomes the moving of the tower southwards away from Pymont Bridge and the reduction in height of the proposed tower, although the reduction in height is minor. The Trust also welcomes the increased setback from 50 metres to 135 metres.

It is difficult to determine how the new proposal interfaces with Pymont Bridge and the Trust urges that all possible efforts should be made to reduce the impacts of that interface, both in terms of height and bulk of the new development. The new interface with the Bridge should be as sympathetic as possible with the heritage and scenic values of the Pymont Bridge.

Open space at Darling Harbour is a very precious and apparently diminishing resource. The impacts of the COVID-19 pandemic and its physical distancing requirements have made people so much more aware of the importance of open space. With an additional 357 apartments in the proposed new tower there will be even more need for maintaining the open space that currently survives at Darling Harbour.

The proposed new podium appears to reduce the width of the existing promenade and increase overshadowing, compounding the impacts of the overshadowing from the new tower proposal particularly in the colder months of the year.

The National Trust has just commented on the "Ten Initial Directions for the Pymont Peninsula Place Strategy" and questions how this development proposal will impact on adjoining historic Pymont.

The Trust urges that these comments be taken into careful consideration during the assessment process for this development proposal, to ensure that Darling Harbour's diminishing open space, solar access and general amenity are not degraded. The final design and construction of this proposal needs to seriously and genuinely deal with these concerns if the current attractive, scenic, maritime heritage and open space values of the Harbour are to be retained and protected from further adverse impacts.

Yours sincerely,

Graham Quint
Director, Conservation