

8 August 2022

The Hon. Anthony Roberts MP
Minister for Planning
GPO Box 5341
SYDNEY NSW 2001

Dear Minister

Central Barangaroo – Modification 9

Central Barangaroo provides unprecedented opportunity to create a world-class cultural and civic precinct that celebrates our iconic harbour and its heritage surrounds and sympathetically integrates South Barangaroo with the Headland Park. A design that is sensitive to its location and that puts public outcomes at the forefront could deliver a unique attraction that is enjoyed by visitors near and far while contributing to the city's beauty and vitality.

But modification 9 is nothing more than a final attempt to squeeze excess development onto the site for short term private profit at the utter detriment of the harbour, public open space, the heritage values at Millers Point and Observatory Hill, iconic views from across the city and Barangaroo itself.

Modification 9 is a second-rate proposal that should be outright rejected.

Bulk and Scale

Gross floor area across the three blocks at Central Barangaroo would swell by 116,189 square metres plus an additional 28,166 square metres below ground, tripling the amount of built form on the site. Heights will increase, overshadowing public open space, creating new wind impacts and severing longstanding connections between the harbour and heritage areas like Observatory Hill Park and Millers Point. New block configurations encroach development onto public open space at Hickson Park and Harbour Park.

Particularly destructive is the proposal for a tower of around 20 storeys high at block 7 above the planned metro station. The tower is poorly placed, adjacent to Nawi Cove, the Headland Park and the harbour promenade. It is starkly out of context with its environment and adjacent development making it an eyesore that would dominate views across the public domain. Its location breaches good planning principles that require building heights to taper down as development gets closer to the water. There is no urban design justification other than to squeeze more real estate profit out of this iconic harbour location.

There is significant and unacceptable development creep outside of the Central Barangaroo boundary. Building overhangs of up to three metres are proposed around the boundary of the site, and community uses which have long been touted as the purpose of the Central Barangaroo redevelopment, have been relocated out of Central Barangaroo to the Headland Park cutaway. There is also significant and unacceptable development encroachment into public open space with built form reducing the boundary of Hickson Park, Barangaroo Avenue relocating to Harbour Park land, and underground development for retail extending below recreational zoned land.

Increased bulk and scale must be rejected.



I refer below to the significant and unacceptable impacts caused by the excess bulk and scale proposed.

Overshadowing

The block 7 tower will cast morning shadows over Harbour Park, Wugul Walk and Nawi Cove. This is a disgrace. The waterfront and adjacent public open space are crucial public provisions that must be protected and celebrated at all times of the day. It is an assault on the vision of creating a global harbour attraction to claim that sun is not needed in the morning. It is already bad enough that the Crown tower shadows much of the South Barangaroo promenade; reducing solar access along the Central Barangaroo promenade adds to significant cumulative impacts on the harbour.

Additional massing under Modification 9 across the proposal would see Hickson Park lose significant solar access in the morning and afternoon including during the winter solstice, when it is needed most. As a result, less than half the park would receive sunlight at midday during the winter solstice. I remind assessors that the response to community opposition to building the Crown tower on land promised for a public harbour park was that the new Hickson Park would have better solar access. The response to submissions to Modification 8 promised that future development would preserve direct sunlight at Hickson Park *throughout the day*. This is a disgraceful betrayal of public trust.

Fort St Public School, Australia's oldest public school and the KU Lance, Australia's oldest childcare centre and a not-for-profit, will be overshadowed. Sunlight is vital to children's learning and development and it is outrageous that latest plans neglect the needs of local children.

Hickson Park

As discussed above, shadow impacts on Hickson Park will erode the park's amenity and betray commitments to preclude any further overshadowing of the park in the future. In addition, shockingly, modification 9 proposes to reduce the park's boundary to make way for bigger and bulkier development at Central Barangaroo. Claims that the new boundary reflects that prior to modification 8 purposely ignore the history which resulted in new land added to Hickson Park under modification 8 to compensate for the insensitive placement of the Crown tower on the public foreshore.

Harbour Park

Harbour Park is the most important feature of the Central Barangaroo development, being crucial to creating an attractive new precinct. But modification 9 would see Barangaroo Avenue encroach onto the recreational park because block 7's built form would encroach onto the roadway. It does not matter that Barangaroo Avenue is set to be pedestrianised, it should not be built over the iconic Harbour Park.

View Loss

Modification 9 fails to honour the longstanding commitment that Central Barangaroo would preserve views from Observatory Hill to the horizon and the harbour. Sydney Observatory Hill Park currently has almost 270 degrees of uninterrupted views of Sydney Harbour. These views have heritage significance dating back to when the park was used to signal incoming ships so that their arrival could be prepared for. Modification 9 would destroy these consistent water views, degrading the park's important heritage values. Other parks across the region would also lose water views.

Observatory Hill is not only heritage listed in Australia, it is included on the UNESCO portal for astronomical heritage. Poor placement of the Crown tower has already blocked views of important constellations from August to October and so-called “marginal” reductions in sky views add to the cumulative erosion of Observatory Hill. Furthermore, the claim that view losses limited to below 10 degrees above the horizon are only “marginal” is false. Many important astronomical views occur at angles below 10 degrees including setting views of the sun, moon, planets and comets. The tower would destroy these views forever.

Outdoor viewing locations at Observatory Hill Park and the Stargazer Lawn currently attract educational seminars associated with the observatory throughout the year, including events held by the Sydney City Skywatchers. These astronomical events where participants bring their own telescopes, binoculars or use their naked eye provide vital science and technology education roles – roles which the proponent has shown a worrying lack of respect for.

The block 7 tower would eliminate iconic views of the Sydney Harbour Bridge and Observatory Hill from Darling Harbour and the Pyrmont Peninsula, including from iconic public parks. Darling Harbour is a major tourist attraction and along with Pyrmont, is a destination for tourist accommodation. Obliterating views in this region to the bridge would erode their place as tourist destinations. This represents a devastating outcome for Sydney for no public gain.

Views of the city from Wulugul Walk will be dominated by the block 7 tower, replacing an intricate city skyline with a crude building mass, eroding the park’s attraction.

Homes on High Street and Kent Street would lose water views and homes at the Highgate, The Georgia and 189 Kent Street would have important Sydney Harbour views interrupted. Views are important to the wellbeing of apartment and terrace residents, who live with no private open space. A view can connect someone inside an apartment with the outside world and create a sense of space. There is no public gain from destroying the views in these homes.

Millers Point Integration

Millers Point is a state heritage-listed precinct, which includes the Millers Point Conservation Area and the Millers Point and Dawes Point Village Precinct. It has historic links to the Barangaroo land and the harbour that are preserved through continuous views. But under the proposed changes, views to the harbour would be severed across Millers Point.

The Secretary’s Environmental Assessment Requirements requires the environmental impact assessment to show the impact on views in Millers Point but little assessment is provided. Instead it is claimed that the views have already been lost under the approved concept plan. This is disingenuous because there were no development applications and the approved concept plan stated that applications would seek to maintain views across the site to and from the harbour. It is unacceptable for the proponent to now try to evade its responsibilities to preserve these heritage views.

Not only does Modification 9 fail to preserve visual links between heritage Millers Point and the harbour, it fails to integrate Central Barangaroo with Millers Point precinct. Increased heights and bulk of development adjacent to Millers Point would create a wall effect that blocks Millers Point from the land and the harbour.

The massing along Hickson Road has swelled to such an extent that the sky would be almost completely obscured on the street and in adjacent homes. Views from Millers Point to Darling Harbour would be obliterated.

Barangaroo development should treat Millers Point as an asset. I support the National Trust of Australia (New South Wales) proposals for retention of the “V” shape of development of High Street when viewed from the water, where heights gradually decrease to the north.

Wind

The supporting documentation fails to make it clear how wind impacts differ between the approved and proposed plans, or which wind impacts will be mitigated. What is clear is that there will be new wind impacts that will make the public domain uncomfortable; this is not acceptable for a world-class urban renewal project on the harbour.

The interaction between the casino tower, the residential towers of Barangaroo South and block 5 will create a wind tunnel at Hickson Park, eroding its amenity and attractiveness.

Poor Justification for Overdevelopment

Lack of public transport was never the reason that Central Barangaroo development was restricted; it was restricted to protect the headland park, the foreshore promenade and the heritage views at Millers Point and Observatory Hill, and to create a sympathetic transition between South Barangaroo and the Headland Park. These outcomes must be preserved with or without a metro service.

The new metro service has been introduced to meet the transport needs of the region generated from massive development already constructed and approved, and adjacent activities including at Walsh Bay and Millers Point where existing public transport services are poor. It is a pity that it is being used as an excuse to overdevelop what was to be the cultural heart of Barangaroo for private residential and commercial purposes. The metro should instead be used to support bringing visitors to the cultural and civic attractions at Central Barangaroo and to the iconic harbour foreshore.

Bizarrely environmental impact assessment documentation claims that the tower over the metro station is good planning because it will provide “an urban marker building highlighting the location of the Barangaroo station” and that it will be an “exclamation mark” for the metro. These attempts to justify overdevelopment are simply absurd and have no planning or design merit whatsoever.

The environmental impact statement declares that modification 9 seeks to deliver a built form and massing outcome consistent with the existing and emerging developments along the western foreshore and CBD edge, including Barangaroo South. Central Barangaroo’s bulk and scale was never meant to be consistent with central business district massing, indeed such an outcome would be disastrous to the precinct’s amenity and purpose. Its design aimed to create a sympathetic transition between the massing of Barangaroo South and the Headland Park.

Affordable Housing Lost Opportunity

Sydney and New South Wales is experiencing an affordable housing crisis with low income earners especially affected. Key workers that ensure the city can function are being priced out and finding jobs closer to where they live.

The inner city urgently needs new social and affordable housing and as a publicly owned site, Central Barangaroo provides an opportunity to deliver. But despite proposing a massive tower dedicated to residential development that will erode local amenity and values, it will only contribute a measly 0.1 percent of each home sold to affordable housing.

Housing affordability should be a high priority for Central Barangaroo development and should deliver around 15 percent of new homes for social and affordable housing.

Access

I share community concern that the traffic and transport impacts have been underestimated. The increase to retail space is akin to introducing an entire Broadway Shopping Centre on the site but only minor increases to traffic are predicted. There is further concern that proposals to pedestrianise Barangaroo Avenue and remove all on-street parking at Central Barangaroo could exacerbate traffic and parking congestion problems that already exist in this geographically constricted area, particularly during events like Vivid and when cruise ships are docked.

The proposed Sydney steps between Central Barangaroo and Millers Point are narrow and likely inadequate, and there is no disability access. It is unclear if bridge access to High Street will be possible given previous conditions of consent that required 50 percent of built form at block 7 to be at the level of High Street to facilitate the bridge have been abandoned.

Central Barangaroo: Cultural Heart Demoted

The community was promised that Central Barangaroo would be the cultural heart of Barangaroo, delivering a new cultural and civic hub that connects the commercial and residential Barangaroo South precinct with the Headland Park, and integrates with the adjacent Millers Point Conservation area. But modification 9's focus on squeezing more commercial and residential development on the site would relegate the cultural vision to a mere token component.

Community space has been relocated to the cutaway at the Headland Park and only 800 square metres of the 144,355 total square-metre increase in gross floor area will be for community purposes. Modification 9 would result in less than half a percent of the total gross floor area in Central Barangaroo dedicated for community uses.

Central Barangaroo must remain true to its cultural, community and civic purpose instead of seeking short term private profit from commercial and residential sales.

Exhibition Period

The proposal is complex and the environmental impact statement involves a large number of detailed and lengthy reports that are of a technical nature. Community members have reported that they need more time to assess the reports to understand the proposal in full. Given the public importance of the site to the wider New South Wales community owing to its location on Sydney's harbour and adjacent to the state heritage items of Observatory Hill and Millers Point, it is vital that the wider community is given adequate time to assess documents and make submissions. I thank the department for providing an extension until 22 August for some and ask that this be extended to the wider community.

Could you please extend the submission period until 22 August for all?

Modification 9 would result in massive overdevelopment at the expense of the harbour, public open space, heritage Millers Point and Observatory Hill, cultural and civic purposes and the longstanding vision of a world-class redevelopment. There is no justification for creating such a poor legacy for future generations on our iconic harbour other than to provide short term private profit for a few.

I urge you to reject this cynical attempt to privatise the values of Central Barangaroo and refuse modification 9.

I ask that you provide a copy of this letter to the department as a submission to the planning application.

Yours sincerely

A handwritten signature in black ink, appearing to be 'AG', written in a cursive style.

Alex Greenwich
Member for Sydney