

1 May 2015

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

Dear Mr Lusher,

Thank you for your letter of 18 March, 2015 seeking comment from the National Trust in regard to the Exhibition of Modification Request for the Barangaroo Concept Plan (MP06_0162 MOD 8) and proposed State Environmental Planning Policy Amendment (Barangaroo) 2015.

Firstly, the Trust notes that the Heritage Map (Sheet HER 001) currently includes only one Heritage Item – The Dalgety's Bond Store Group. In fact there are six Heritage Items that are sited within the Subject Land: -

1. The Sydney Harbour Maritime Control Tower – originally listed on NSW Ports Section 170 Heritage Register – Nominated for listing on the State Heritage Register and recommended by the Heritage Council for listing on the State Heritage Register.
2. Dalgety's Bond Store Group
3. Sewage Pumping Station No 14 (surface structure relocated, subsurface structure buried) (State Heritage Register Listed)
4. 19th Century Sandstone Sea Wall.
5. Moore's Wharf & Stores Building, Town's Place & Dalgety Road
6. Western edge of the State Heritage Register listed Millers Point & Dawes Point Village Precinct.

The Statement of Heritage Impact prepared by TKD architects states "there are no listed heritage items on the development site." This is clearly incorrect.

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.

The Trust would be pleased to discuss with the Department a Concept Plan Modification which would achieve much greater community benefits through better protecting the unique heritage of Millers Point, East Darling Harbour and Sydney Harbour.

Yours sincerely

Graham Quint
Director - Advocacy