

20th February 2024

The Director General
NSW Department of Planning and Environment
4 Parramatta Square, 12 Darcy Street
Parramatta NSW 2150

**Barangaroo Central – MP06_0162 / Modification 9 to Concept Plan
Letter of Objection**

We write to object in the strongest possible terms to the latest Modification 9 amendments to the Concept Plan for Central Barangaroo (Blocks 5,6 and 7).

1.0 Planning Pathway

Modification 9 continues the distortion of the planning process for this site of unparalleled importance. Since the original Concept Plan in 2007, the discredited Part 3A planning pathway has been used to make numerous 'modifications'. In effect these have subverted the form and intent of the original approved Concept Plan (Hill Thalys contributed to the design drawings and physical controls in that Plan). As with Modifications 1-8, this is not a Modification but a substantial reworking of the site that undermines the public qualities of the original approval.

Modification 9 should be a new application, subject to a full assessment process. Indeed, this application seems to be 'innovating' by proposing a modification to a rejected or withdrawn modification.

2.0 Incorrect Project Description

The Planning Portal deceptively reports on this new Modification in relation to the rejected and withdrawn 2022 Modification 9 Application. The numerics – GFA, Height etc, are referred to as reductions, but they are reductions related to a plan that never received planning approval and has no statutory status. Instead DPIE should be reporting on the increases relative to the original 2007 approved Concept Plan, as it purports to be a Modification application.

The statements in their current form give the public a misleading basis on which to understand the impacts of this application.

3.0 Public Space

There is no Public Space, capable of being dedicated to the City of Sydney and operating as part of a coordinated and cohesive public network, identified on the Modification 9 plans.

This is one of the many anti-public aspects of the proposal, and reason enough for its rejection. Private development, without any demonstrated public benefit, should not occupy prime waterfront land in the City. For the avoidance of doubt, 'shopping' is not a public benefit.

3.1 Barangaroo Avenue

Barangaroo Avenue, the element of the original Concept Plan approval that provides continuity to the urban form and connections to the wider city, is proposed to be trivialised into little more than a private driveway or drop off in Modification 9. This would diminish the city's western edge street – the complement to Macquarie Street on the east. The proposal is a distinctly anti-urban configuration that is inappropriate and does not fulfill the critically important public role of this site to frame Sydney's public interface with the harbour. Significant long term impacts result from such a diminished benchmark of the role, and resilience of streets at their inception. Seeing the role of this street as a service role for private vehicles lacks public vision. This proposal lends this critical public space all of the distinction, scale and gravitas of a shopping centre loading bay.

The proposal continues, and increases, the now well demonstrated risks of facilitating co-option and privatisation of the public park edge. This process has been seen at places like Wentworth Point and Breakfast Point and should not be allowed to be repeated at the critical western edge of the city.

3.2 Proposed East West 'Plazas'

The pair of proposed East West oriented spaces, dubbed 'plazas' are formed with a tightly constrained separation between buildings. As a consequence they would have limited vistas to the harbour and park, would be overshadowed and dominated by the bulk of the flanking building. As with the miniaturised 'service roads' in Barangaroo South, they structure only a commercial marketing opportunity, in dereliction of their wider duty as part of the city structure and public space. It is my opinion that these are the most substandard 'streets' proposed in the city centre since the mid C19th.

Furthermore, the layout of these plazas and the transverse laneway are dictated by the footprints and floor plates of the private development parcels, rather than tied into an idea of the broader city structure. They are residual to development needs, rather than framed for public purpose. The relation of the South Plaza to Agar Street is not specifically defined – desirably it would be wider than Agar Street to open the public view to the harbour from Millers Point.

The plazas lack any deep soil for the long-term planting of trees, as they have 3 levels of basement beneath. The basement should be substantially reduced and deep soil provided under genuine public spaces. This precinct is justified on the basis that it has access to a Metro station. Parking rates should be drastically cut, to reflect its privileged access to public transport.

Modification 9 is world's worst practice - all the purported public spaces designated as 'plazas' – aren't such spaces really just an outdoor shopping mall?

3.3 Hickson Park

Hickson Park has been consistently diminished through Modifications 1 to 8 – moving from the foreshore position it occupied in the Concept Plan approval to become inset and isolated. It has poor edge definition and in urban terms reads as the resultant geometric afterthought of the planning of the residential towers. Additionally, it is burdened with four storeys of private car parking beneath it, in defiance of all contemporary best practice in public space and sustainability terms, which seeks holistic and genuine landscape outcomes.

Modification 9 proposes to diminish further the amenity of this 'park' (sic) forecourt space by imposing additional overshadowing. The shadow diagrams in the submission materials omit the shadow impact of the Barangaroo casino. It is heavily overshadowed in mid-winter.

The cumulative impacts of Modifications 1 to 8 have succeeded in making this 'public space' a parody of the original Concept Plan. Modification 9 continues this erosion of its public sensibility, amenity and utility.

3.4 Metro Entrance

The relationship to the Barangaroo Metro Station lacks presence or integration. It would be better as a stand-alone structure on the Hickson Road frontage, set independently north of this development.

3.5 Community Space

The Community space is an insult to the existing and future community. It is entombed, with no presence to a genuine public frontage. Instead it has a minimal presence on the narrower North Plaza, where one descends into the depths of the bloated basements and car park.

The proposed Community space totals just 2 700m² (Cutaway void 18 000m²) out of gross total floor area across Barangaroo. This equates to public buildings being at most 0.025% of total floor space at Barangaroo. This level of provision is below any international standard and is a poor outcome on 22 hectares of foreshore public land adjoining the city centre.

Again the contrast with the original site planning could not be more stark: it presented a freestanding and distinctive public community building, addressing public space on all sides and adding to the complex Millers Point skyline.

3.6 Pedestrian Bridge from High Street

Some plans appear to show a narrow curving bridge from the low point in High Street, where historically there was a bridge across to the associated wharves. It seems to disappear into the building, perhaps dropping by an internal stair within a shopping area. Circulation and movement through the site is not clearly demonstrated – nor the times of day that said movement will be available to the public.

A direct pedestrian bridge should extend from this low point in High Street over Hickson Road to land in public space. It should have clear wayfinding and an unimpeded vista to public parkland and the harbour waters beyond. It must be open 24/7.

4.0 Blocked views between Sydney Harbour and Observatory Hill

Modification 1 to 8 has succeeded in diminishing the city's relationship to its harbour through the massing of the gross commercial and now residential towers on the site that prioritise their view capture, rather than the maintenance of visual links from the city to the harbour. This has been to the direct commercial benefit of the Barangaroo precinct's private developers, and the expense of the greater city.

Modification 9 extends this principle of prioritising the private interest over the needs of the city. The proposal to increase the height of Blocks 5, 6 and 7 severs the relationship between the harbour and Observatory Hill – a historically, and culturally significant relationship that is proposing to be broken for the sake of additional floor space. The removal of the "Trojan Horse" of the 20 storey tower has in no way satisfied the critical retention of the memorable silhouette of Observatory Hill as seen from the harbour.

The aptly-named Observatory Hill has, since European occupation and no doubt long before, provided an unrivalled panorama of Sydney Harbour and now the city. This reciprocal relationship would be severely and irreparably damaged, were this proposal to be approved. The long view along the axis of White Bay will be completely blocked, the closer views to Darling Harbour obliterated, while the views to the Observatory from the west would be largely lost, appropriated by a mass of buildings filling their inflated envelope.

Further it would inevitably act as an undesirable precedent that risks allowing other buildings to further intrude on, and diminish, Observatory Hill's relationship to the harbour.

5.0 Urban Design

The Urban Design Report is lengthy but inadequate. The 'urban design' fails to set out its critical role in the framing of the extension and connection with the city, as there is effectively no public space to give orientation, connection and scale in Barangaroo Central. The urban design proposal is one that focuses on the needs of commercial development form proposing a monolithic singular development – rather than an urban framework, within which differentiated and articulated development is situated.

Currently building forms present as monotonous masses, of uniform height. Rather than having closed and internalised courtyards, all the building envelopes should be reconfigured to be East-West aligned blocks to allow outlook and breezes to High Street and Millers Point behind. The street wall to Hickson Road is massive and undifferentiated. It should be lowered to be no higher than the levels of the High Street escarpment opposite.

Like Barangaroo South, Barangaroo Central is prioritising its commercial and residential benefit as a controlled and singular enclave – formally homogenous, inward-focused and corporate. The lack of authentic form, scale and typological diversity renders this form of development disposable when too soon obsolete.

6.0 Basements and Car Parking

The developable parts of Barangaroo are all on reclaimed land full of fill – areas that were once water. The extent of excavation should be drastically reduced.

There can be little credible justification for the nebulous retail in Basements 1 and 2. They risk attracting shoppers in cars to this most isolated corner of the city.

The car park in Basement 3 is excessive. The extent of the excavation and the car parking numbers should be radically reduced.

7.0 Housing

The proposal seeks to build 150 luxury apartments and a new hotel on Sydney Harbour foreshore previously allocated to be the 'civic and cultural heart' of Barangaroo.

The housing proposed are huge apartments for the super wealthy. As seen at East Circular Quay and Barangaroo, these provide little urban life – such residents being targeted here so often own multiple properties – they tend to be rarely present, and in any case typically have low occupancy.

Sydney is in the grip of a housing crisis. There is no attempt to address housing diversity in terms of type or tenure. There is no plan for public housing – no plan for affordable housing. This is publicly held and owned land. The opportunity cost of poor choices made in this place resonate for decades to come.

8.0 Planning and the Public Interest

The developer of Central Barangaroo seeks to double the size of the approved concept plan (from 45,000 to 104,000 m²), despite offering a negligible improvement in public benefit.

Barangaroo Central remains against the public interest – a commercially inward-focused enclave appropriating the foreshore of Sydney Harbour. It diminishes its relationship to the broader city and to isolate the extraordinary qualities of the site for its own benefit. It treats historic vistas and long-standing cultural relationships with contempt. It has no network of genuine public spaces.

It is wholly conceived of in terms of development self-interest, undermining and deforming existing planning principles to maximise commercial gain. It irretrievably devalues the nationally-important heritage context of Millers Point and Observatory Hill.

Barangaroo's planning, Modification 9 continues the legacy of undermining the aims of the 2005 Sydney Harbour Regional Environmental Plan;

Clause 2 Aims of Plan


(2) For the purpose of enabling these aims to be achieved in relation to the

Foreshores and Waterways Area, this plan adopts the following principles:

- (a) Sydney Harbour is to be recognised as a public resource, owned by the public, to be protected for the public good,*
- (b) the public good has precedence over the private good whenever and whatever change is proposed for Sydney Harbour or its foreshores,*

For the above reasons, Modification 9 should be rejected.

Yours faithfully,



Philip Thalys LFRAIA

Director Hill Thalys Architecture + Urban Projects Pty Ltd

B Sc Arch, B Arch, USyd, CEA Arch Urb (Paris)

Professor of Practice in Architecture UNSW

