

David Glasgow  
Planner  
Department of Planning, Industry and Environment  
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By email: david.glasgow@planning.nsw.gov.au

Dear Mr Glasgow

**Notification of Modification Application - Barangaroo Concept Plan Approval (MP 06\_0162 MOD 9)**

Thank you for your referral dated 12 July 2022 inviting comments from the Heritage Council of NSW on the above Major Project Modification proposal.

The proposed development involves an increase in the total permissible gross floor area (GFA) within Barangaroo from 602,354 sqm to 708,041 sqm and the following changes to Central Barangaroo (Blocks 5, 6 and 7):

- (1) increase the maximum GFA from 47,688 sqm to 144,355 sqm (including 116,189 sqm of above ground GFA and 28,166 sqm of below ground GFA)*
- (2) increase the minimum community uses GFA from 2,000 sqm to 2,800 sqm*
- (3) allocate up to 18,000 sqm of GFA for The Cutaway within Barangaroo Reserve (previously unallocated)*
- (4) increase the area of Block 5 by relocating the boundary to the south and reducing the size of Hickson Park*
- (5) modify the road network, including the removal of vehicular traffic from Barangaroo Avenue north of Barton Street adjacent to Blocks 5 and 6 with controlled service vehicle access only, and converting Barton Street to a permanent street connecting Barangaroo Avenue with Hickson Road, servicing the wider Barangaroo precinct*
- (6) modify the approved building envelopes of Blocks 5, 6 and 7 including additional height, block alignments, additional GFA and flexible allocation of GFA across the blocks*
- (7) introduce Design Guidelines for Central Barangaroo to guide future detailed proposals*
- (8) amend the State Significant Precincts SEPP to support the proposed modifications to Central Barangaroo.*

The proposed Major Projects proposal affects a number of the State Heritage Register (SHR) item in its vicinity including Millers Point and Dawes Point Village Precinct, Sydney Observatory, Dalgety Bond Store, Munn's Slipway, Sewage Pumping Station, several other properties individually listed on SHR as well as on Sydney LEP including Palisade Fence & High Steps and Fort Street School.

Millers Point Conservation Area is an intact residential and maritime precinct of outstanding State and national significance. It contains buildings and civic spaces dating from the 1830s and is an important example of nineteenth and early twentieth century adaptation of the landscape. The precinct has changed little since the 1930s.

The Observatory is a fine and rare example of a purpose-built observatory structure and is of exceptional significance for its dominant location in the City of Sydney. The siting, with its harbour and city views and vistas framed by mature Moreton Bay fig trees of the surrounding park, make it one of the most pleasant and spectacular locations in Sydney.

In addition to the setting, and views and vistas to and from Millers Point area and other heritage items, sky views from the Observatory telescopes as well as views to the Time Ball tower (which continues to drop time ball every day for last 160 years) are also of significance.

The following reports were considered in our assessment:

- *Environmental Assessment Report titled Central Barangaroo Concept Plan MP06\_0162 Modification 9* by Urbis dated December 2021, including its appendices.

In response to your referral and public submission process, Heritage Council of NSW in its meeting dated 11 August 22 resolved to:

1. **Thank** the National Trust, Langham Hotel and Millers Point Residents Association for their presentations to the Council
2. **Note** the importance of Observatory Hill to Aboriginal people pre settlement, to the early colonists of Sydney for time setting and astronomy, and to modern Sydney through both Observatory Hill and Millers Point as one of the most significant heritage precincts in the City.
3. **Note** that the proposal is likely to adversely affect one of the most significant heritage precincts in the country with (possibly) the highest concentration of listed items - Millers Point contains in excess of 100 State and 60 locally listed items. The peninsula provides a rare opportunity to understand and appreciate such a large and intact collection of very significant heritage items. The proposal directly and irreversibly compromises this.
4. **Note** that the State Heritage listed Millers Point and Dawes Point Precinct is a rare maritime harbourside precinct with vistas and glimpses of the harbour along its streets and over rooftops. An important aspect of its significance is the historic maritime connections between Millers Point and the waterfront. Its rows of terrace houses, which were specifically constructed for its dockside workers, its laneways and streets have retained the ability to demonstrate that way of life through a physical and visual connection to the harbour. The impact of the height, bulk and scale of the proposal on the significance of the precinct is unacceptable.
5. **Note** that Millers Point & Dawes Point Village Precinct is of state significance for its landmark qualities as a terraced sandstone peninsula, its most prominent landmark being the Sydney Observatory. The height of the proposed Tower Building exceeds the height of the domes of the Sydney Observatory and will have an unacceptable impact on views to the Observatory and its setting from the west and south-west. The tower may negatively impact panoramic views to the Observatory and its setting

*from key viewing points to the east and north-east and these have not been adequately assessed.*

6. **Note** that the proposed envelopes depart significantly from the pre-existing approved envelopes, concept plan and the design and development principles for Barangaroo, and the Government's commitment to those controls, and prioritises private benefits over important State significant public heritage spaces.
7. **Advise the Department of Planning of its strong objections to the proposed increase in building volumes and heights on the heritage values of Millers point and Observatory Hill and in particular, the sight lines and panoramas to and from those precincts.**

If you have any questions regarding the above advice, please contact Rajat Chaudhary, Senior Assessments Officer, at Heritage NSW on 02 9873 8521 or [Rajat.Chaudhary@environment.nsw.gov.au](mailto:Rajat.Chaudhary@environment.nsw.gov.au).

Yours sincerely

*Rajeev Maini*

Rajeev Maini  
Manager, Assessments South  
Heritage NSW  
Department of Planning & Environment  
**As Delegate of the Heritage Council of NSW**  
19 August 2022