



20/08/2025

Attn: Heritage NSW

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AUSTRALIAN INSTITUTE OF LANDSCAPE ARCHITECTS (AILA)
SUBMISSION

RUSHCUTTERS BAY PARK AND YARRANABBE PARK (SHR NO. 02041)

TITLE: RUSHCUTTERS BAY PARK AND YARRANABBE PARK (SHR NO. 02041), PROPOSED
RUSHCUTTERS BAY PARK YOUTH RECREATION AREA

ADDRESS: WARATAH STREET, RUSHCUTTERS BAY NSW 2011

LOCAL GOVERNMENT AREA: WOOLLAHRA MUNICIPAL COUNCIL

SUBMISSIONS CLOSING DATE: 5.00 PM 20 AUGUST 2025

PREFACE

The Australian Institute of Landscape Architects (AILA) is the peak national body for Landscape Architecture. AILA champions quality design for public open spaces, stronger communities, and greater environmental stewardship. We provide our members with training, recognition, and a community of practice, to share knowledge, ideas and action. With our members, we anticipate and develop a leading position on issues of concern in landscape architecture. Alongside government and allied professions, we work to improve the design and planning of the natural and built environment.

In operation since 1966, AILA represents over 3,500 landscape architects and promotes excellence in planning, design and management for life outdoors. Committed to designing and creating better spaces in Australia, landscape architects have the skills and expertise to improve the nation's liveability through a unique approach to planning issues via innovative integrated solutions. In doing so, landscape architects contribute towards better environmental, social and economic outcomes for all Australians.

The work of landscape architects is recognised for creating liveable cities and sustainable design outcomes for everyone, our members help shape many projects across Australia, creating the vibrant community spaces for all.



We believe that AILA, through its advocacy, will significantly contribute to a better-informed urban development decision-making process, the enhancement of our urban greenspaces, and long-term community wellbeing.

STATEMENT

The Australian Institute of Landscape Architects (AILA) OPPOSES the proposed Rushcutters Bay Park Youth Recreation Area.

BACKGROUND

AILA has reviewed the documentation, on public exhibition, of the Youth Recreation Area proposal NSW State Heritage listed **Rushcutters Bay Park and Yarranabbe Park (SHR no. 02041)**.

The objection is founded on the detrimental impacts the proposed facility (proposal) would have on the state listed parkland particularly on its recognised cultural values identified in the heritage item's Statement of Significance (SoS) and its heritage guideline document, Conservation Management Strategy 2021 (CMS).

Description of the proposal as per the s60 application form: Rushcutters Bay Park Youth Recreation area is a junior facility that includes a basketball space, scooter and skate elements, shelter, seating and landscaping.

The Australian Institute of Landscape Architects (AILA NSW) supported the listing of the parks as State Heritage in 2019. At that time, AILA wrote,

- *The listing Rushcutters Bay Park and Yarranabbe Park will ensure that thorough reviews be conducted prior to any developments, and that qualified, experienced professional heritage consultants and landscape architects be engaged in the review process.*

Values in the SoS (shown in italics) which are likely to be impacted by the proposal include:

SoS VALUES – VIEWS and TREES

- *This broad expanse of open foreshore land, punctuated with rows of huge Moreton Bay figs form a magnificent southern boundary to this bay-side common, located beside the most densely populated area of Sydney, a place of respite from city life, and an opportunity to enjoy sweeping views of inner Sydney Harbour.*

Comment:

Rushcutters Bay Park's sweeping views are illustrated in the CMS **Figure 2.99 Grading of significance—views**. The ranked 'exceptional' view looking north from the park's southern edge would be severely impacted as well as 'high' views (within the park).



Even a partial loss of this exceptional view which demonstrates the connection of the landscape to the waterway is considered unacceptable. Exceptionally ranked trees will also be impacted by the proposal.

In the CMS **Table 2.1 Significance Gradings and Justification**, the exceptional ranking of fabric which includes views, recognises this grading as any *Rare or outstanding element directly contributing to an item's local and/or state significance*. The proposal directly threatens exceptionally ranked elements and therefore the SHR values of the item

RECOMMENDATION

1. Exceptional fabric, tangible and intangible, of the Rushcutters Bay Park and Yarranabbe Park (SHR no. 02041) to be conserved intact. Impacts on significant views and unnecessary tree works to be avoided.

SoS VALUES – GROUNDS AND LAYOUT

- Both parks are exceptional and *"reflect the influence of James Jones, Overseer for the Domains who laid out Victoria Park then Wentworth Park, incorporating sports ovals, greens and paths with lines or avenues of trees into the design, which was innovative and reflected practice in England and France in the 1870s. Rushcutters Bay Park was designed by engineer Frederick Augustus (F.A.) Franklin, who also designed Sydney's Centennial Park. Both parks retain their structure and layout..."*

Comment:

The parkland grounds and layout are ranked exceptional in the CMS in **Figure 2.94 Gradings of significance of Rushcutters Bay Park—soft landscape elements** and **Figure 2.95 Gradings of significance of Rushcutters Bay Park—hard landscape elements**.

These diagrams substantiate that these historic grounds and layout, directly contribute to the significance of the park. The location of the proposal therefore should be elsewhere.

There is a comment in the Heritage Impact Statement (HIS) stating the location for the proposed facility 'is currently underutilised by the public'. Categorising the area as 'unbuilt' or 'underused' is not accepted as an approach to understanding the significant contribution cultural landscapes as green open space makes to wellbeing and mental health for all members of our urban communities. This reason for facility location should not be accepted.

The proposed facility is also considered over-scaled and visually and culturally intrusive, it will alienate a large lawn which is currently also used for exercise classes, picnics, and ball games by all age groups.



RECOMMENDATION

2. The exceptional ranking of the grounds and layout to be conserved intact. Introduced intrusive elements which dilute an understanding of the parkland values to be avoided.

SoS VALUES – ABORIGINAL CULTURAL HERITAGE

- *Rushcutters Bay Park and Yarranabbe Park have research potential to inform our knowledge over Aboriginal-settler contact and possible conflict in the early colonial period and 19th century cultural interactions in inner Sydney, shifting camps and settlement, interactions with colonists and increasing suburbanisation. Both have research potential on early and ongoing Aboriginal resistance to colonialization, lobbying for equal rights and for better living conditions.*

Comment:

The place has identified Aboriginal cultural heritage values. The proposed facility would be in the area illustrated in the CMS **Figure 2.93** as an area of *Aboriginal cultural heritage sensitivity* at the southern end of Rushcutters Bay Park. The proposal would severely impact the legibility of First Nation values across the landscape and connection to the waterway. Because a CMS is not generally informed by community engagement, the voices of First Nations people connected to the place are not heard in the guideline document.

The Government Architect NSW *Connecting with Country Framework* (CwCF) on page 32 asks 'If people and their needs are at the 'centre' of design considerations, the landscape and nature are reduced to second-order priorities. If design and planning processes consider natural systems that include people, animals, resources and plants equally – similar to an Aboriginal world view – this could make a significant contribution to a more sustainable future.'

Opportunities for engagement with the Aboriginal community and a 'Country-focused design' (CwCF) for the significant places would ensure better built outcomes for the place and consider it beyond its park boundaries. The Heritage Impact Statement recommends consultation with Aboriginal communities as a way to mitigate the impacts of the proposed facility.

RECOMMENDATION

3. Consider a more environmentally sustainable future for the parks by seeking significant and meaningful contribution through First Nations engagement.

LANDSCAPE HERITAGE ASSESSMENT

AILA recommends that for heritage listed places, suitably qualified Registered Landscape Architects with qualifications, experience and training in Heritage Conservation be engaged to assess proposed developments.



4. AILA objects to the proposal as the siting of a skate park in this park as it poses unacceptable impacts on green infrastructure of State heritage significance.

CONCLUSION

GREEN NECKLACE

The AILA Landscape Heritage study, and its nominations initiated the Green Necklace vision achieved by the recent heritage listings of *Yurulbin Park and Foreshore* and *Balls Head Reserve*, together with the earlier listed *Badangi*, *The Berry Bay Precinct (Carradah Park)*, *Ballast Point Park*.

Rushcutters Bay Park and Yarranabbe Park (SHR no. 02041) as significant green open space within the Sydney Harbour catchment could be referred to as part of the broader 'green necklace' of the harbour. In essence, this approach aligns with the vision of the study which was to conserve Sydney Harbour and its foreshores – a necklace or series of parks, government institutions and Crown lands, fragments of green open space and surviving bushland around the Harbour foreshore, all recognised as a valued cultural landscape within the harbour and Sydney region.

GREEN GATEWAY

In addition to unacceptable possible impacts on SHR significant grounds, layout, existing fig trees and views, the proposal will alienate a large lawn which is currently also used by all age groups.

Whilst AILA supports providing more play facilities for youth, this is a most inappropriate and insensitive proposal planned for one of the loveliest 'green gateways' to the eastern suburbs and is not supported.

Sincerely yours,

Natalie McEvoy

AILA NSW President

SUBMISSION TEAM: Christine Hay

REFERENCES

FORESHORE SCENIC PROTECTION AREAS IN SYDNEY HARBOUR FORESHORE STUDY 1967

AILA LETTER OF SUPPORT, LISTING ON THE STATE HERITAGE REGISTER : RUSHCUTTERS BAY AND YARRANABBBE PARK, 20.11.2019