



Australian Institute of  
Landscape Architects

25 May 2025

To  
Placemaking NSW  
PO Box N408,  
Grosvenor Place NSW 1220

#### SUBMISSION

#### **WALAMA – BALLAST POINT PARK MANAGEMENT PLAN**

#### LINK TO REVIEWED MATERIAL

<https://www.darlingharbour.com/getmedia/7dc24662-d13f-458c-991f-67d1801890d2/ballast-point-park-management-plan-2025-public-exhibition.pdf>

#### PREFACE

The Australian Institute of Landscape Architects (AILA) is the peak national body for Landscape Architecture. AILA leads a dynamic and respected profession creating great places to support healthy communities and a sustainable planet.

This is a state-led submission by AILA's NSW Chapter. With over 3000 members, AILA NSW advocates to government to present leading positions on issues that concern landscape architecture. We work to improve the design, planning and management of the natural and built environment.

#### POSITION/ISSUE

AILA expresses concern regarding the proposed Draft Ballast Point Park Management Plan, specifically the need for a Conservation Management Plan (CMP) to be developed before the management plan, to respect the park's NSW State Heritage Listing status and its international landscape architecture significance.

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#### RECOMMENDATIONS - (REFER ATTACHMENT A - AILA DISCUSSION PAPER FOR FULL DETAILS)

AILA makes the following recommendations to:

1. Update the management plan to reflect relevant State legislative protections following the gazetted heritage listing of Ballast Point Park.

2. Develop a Conservation Management Plan prior to the management plan, created by qualified and experienced Landscape Architects.
  3. Engage in consultation with the original designers (McGregor Coxall) and AILA as nominators of the SHR Listing.
  4. Include qualified Landscape Architects in the management planning team.
  5. Incorporate guidance for consultation with McGregor Coxall in drafting any proposed changes.
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## PURPOSE

1. Ensure the conservation and integrity of Ballast Point Park, respecting its State Heritage significance.
  2. Guide appropriate management planning and prevent degradation of the park's acclaimed design.
  3. Advocate for the involvement of professional Landscape Architects in management planning processes.
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## BACKGROUND

Ballast Point Park, located on Wangal Country, is an internationally acclaimed landscape architecture project designed by McGregor Coxall. The park is recognised on the NSW State Heritage Register and demonstrates significant post-industrial landscape architecture innovation.

Despite its gazetted heritage status as of 31 March 2025, the Draft Management Plan has not been updated to reflect legislative protections. Current management proposals risk compromising the park's original design intent and heritage integrity without appropriate consultation and conservation planning.

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## ATTACHMENTS

Attachment A – AILA DISCUSSION PAPER – WALAMA BALLAST POINT PARK CONSERVATION REQUIREMENTS

Sincerely yours,



David Moir

AILA NSW President

## SUBMISSION TEAM

'This submission has been prepared by the AILA NSW Advocacy Committee AILA NSW Landscape Heritage Group.

## ATTACHMENT A

### BACKGROUND

- Ballast Point Park, on Wangal Country, is an international award winning park, recognised by its listing on the NSW State Heritage Register. Its setting is of world heritage significance. Its 21<sup>st</sup> century designers include Anton James Design, CAB Consulting, Context, Deuce Design, and McGregor Coxall.
- *the Minister for Heritage has, on the recommendation of the Heritage Council of NSW, directed the listing of Ballast Point Park on the State Heritage Register (SHR). The listing.. was published on 4 April 2025 in NSW Government Gazette No. 134. (Min. Heritage, The Hon. Penelope Sharpe)*
- Formal State Heritage listing of Ballast Point Park is the result of the AILA Landscape Heritage nominations, lodged in 2018, as part of the AILA Landscape Heritage Study nominating 10 places: <https://aila.org.au/common/Uploaded%20files/AILA/Resource%20library/Landscape%20Heritage%20Report%20Volume%201-2.pdf>
- The Statement of Significance from the listing of Ballast Point Park states, about the design of the park:
  - it is an acclaimed park designed by the prominent landscape architects McGregor Coxall. It demonstrates the key characteristics of post-industrial landscapes, notably the retention and celebration of former industrial features, including the remains of Caltex oil tanks and the archaeological relics of the marine villa, Menevia.
  - Ballast Point Park was at the forefront of sustainable urban design in the early 21st century, reusing materials from the Caltex operations and implementing sustainable water and energy apparatus.
  - The creative and technical achievement of Ballast Point Park has been recognised by several national and international awards, and recognition by the Australian Institute of Landscape Architects as one of the most 'transformative' parks in Australia.
- The current park management desires changes to the park design, for maintenance reasons.
  - **Priority 1.2 intends to** “Protect and Enhance the parks cultural heritage values states (e) Develop and implement a Conservation Management Plan to support the preservation and protection of physical and intangible heritage values and consider the Park’s potential state heritage significance”
  - **Priority 1.3 intends to** “Improve the Park’s natural landscape qualities and relationship to the water and headlands of Sydney Harbour (a) sensitively plan upgrades and improvements to enhance cultural heritage and landscape character” and improve connection to Country views, shade and seating.

- **Section 2** investigates ways of improving biodiversity.
- **Section 3** looks at access for all.
- **Section 4** looks at net zero targets, digital accessibility and governance.
- “I believe Ballast Point is one of the best examples of design-based planning...” – Survey participant

## DISCUSSION

- While the heritage listing of the place is mentioned as ‘proposed’ at the time of writing the Plan, the document is yet to be updated to include its gazettal on 31 March 2025 and relevant State legislative protections and triggers which initiate its statutory processes.
- The mention of its State Heritage status cited from the Local Environmental Plan is not up to date.
- Engagement with Aboriginal community and local community is supported. However, the significance of the Park extends beyond the local, as noted in the Landscape Performance Series Case Study Investigation supported by US based Landscape Architecture Foundation and evaluated by Landscape Architect and academic Simon Kilbane 8 years ago, noting its popularity has grown since then;
  - “in addition to attracting many local users, the use of the park as a backdrop for magazine photo shoots and weddings is indicative that it does hold some broader appeal as a cultural contribution to the city as a whole.”
- The 'Green Necklace' is a central theme of the document. It is the basis of Objective 1 'Preserve and interpret cultural heritage values.' Its explanation on page 5 however requires strengthening. A landscape heritage framework, this term formed the vision of the 2018 AILA NSW Landscape Heritage Conservation Project. It refers to the connected, shared and overlapping natural and cultural histories and values between headlands and associated reserves of the harbour as one cultural landscape. Included in the projects "Green Necklace' listing nominations (Figure 1), were; Walama - Ballast Point Park (6), Badangi (2&3) , Balls Head Reserve (4), Yurulbin Park and Foreshores (7), and Berrys Bay Precinct - Carradah Park (5).

*Figure 1 AILA Report p 37 overlay of drawing 'Sydney Harbour municipal parks and National Park context'  
by Craig Burton & SixMaps 6 = Ballast Point Park*

- The design and configuration of the park are fundamental to the significance of Ballast Point Park as proven by the Statement of Significance.
- Little information is provided in the management plan about the history, evolution, design intent or cultural heritage impact of the acclaimed Masterplan and Concept designs as a whole, or the Landscape Architects working with community to design them.
- The Institute considers an early study, by the emerging profession of Landscape Architecture, to be of great importance to conservation of foreshore and the green necklace idea in Sydney Harbour. Mapping and analysis done at the Investigation and Development Branch of The State Planning Authority in 1967, under Chair, Nigel Ashton, formed the basis of recommendations to the Minister for Local Government for Sydney Harbour public recreational land and foreshore walks,

*“with the object of ensuring that outstanding visual and recreational assets afforded by the harbour are protected and enhanced”.*

This shared history is fundamental to the Statement of Significance and thus to the missing step, the Conservation Management Plan that guides future planning, including management and interpretation plans.

- While the AILA Landscape Heritage Report is mentioned in footnotes, it deserves more recognition and synthesis to inform the Plan. The nomination has been publicised since June 2018.
- It is not clear if any of the Landscape Architects, including McGregor Coxall, have been consulted as part of the process of drafting the Management Plan. They are mentioned only once, in the acknowledgements.
- AILA is concerned management changes, if not made in consultation with the designers of the park, may diminishes the design's integrity, a contributing factor to the Statement of State Heritage Significance.
- As a statutory listed site, a Conservation Management Plan (CMP) must be prepared ahead of the management plan. The CMP will address the total significance of the site, particularly identifying the configuration of the McGregor Coxall design and its components for protection. Together with diagrams, policies and recommendations, the CMP as a management tool will respect the shared history and take a wholistic cultural landscape approach to conserving its integrity long term

In terms of governance (4.3) and landscape performance monitoring (c), the existing Internationally supported Landscape Architectural research projects: Case Study Investigations, in partnership with Landscape Architecture Foundation (Kilbane, 2017) and Landscape Foundation Australia (ongoing) are not cited.

## RECOMMENDATIONS

1. Update the document to include relevant State legislative protections and triggers which initiate its statutory processes
2. It is essential that a Conservation Management Plan be developed by qualified and experienced Landscape Architects with heritage conservation training, before any decisions about change to the park are made. This will accurately evaluate the current significance and guide future management planning, including stakeholder/ community consultation.
3. In drafting and approving any Conservation Management Plan for the now State Heritage listed landscape of Ballast Point Park, consultation with the living designers of the park, Phil Coxall and others at McGregor Coxall and the nominators of the SHR Listing, The Australian Institute of Landscape Architects is necessary.
4. As the Park is a multiple, International award winning Landscape Architecture project of State Heritage Significance, the Management Planning team must include suitably qualified Landscape Architects.
5. The Management Plan must include guidance about consultation with the designers of the park, McGregor Coxall, in drafting and approving any changes that may impact the design.

The Australian Institute of Landscape Architects commends the ongoing care of Ballast Point Park. We welcome further discussion on how best to support Connection with Country, respect landscape heritage, enhance access for all, enrich biodiversity and improve governance in landscape planning. Thank you for the opportunity to comment prior to finalisation of the Plans.

## REFERENCES

Hromek, D. (2019). The (Re)Indigenisation of Space: Weaving narratives of resistance to embed Nura [Country] in design. (Doctoral thesis). University of Technology Sydney, Retrieved from <https://opus.lib.uts.edu.au/handle/10453/137126>

SYDNEY HARBOUR FORESHORE STUDY 1967, NSW DPIE ELIBRARY  
<https://nswdpe.intersearch.com.au/nswdpejspui/handle/1/7783>

AILA Landscape Heritage Report 2018. Vols 1& 2 prepared by Christine Hay, Colleen Morris and James Quoyle supported by Heritage NSW  
<https://www.aila.org.au/Web/Web/Education/Resource-Library.aspx>  
<https://aila.org.au/common/Uploaded files/ AILA/Resource library/Landscape Heritage Report Volume 1-2.pdf>

AILA Ballast Point Park Nomination – Colleen Morris 2018  
<https://www.aila.org.au/common/Uploaded%20files/ AILA/Resource%20library/Ballast%20Point%20Park%20nomination.docx>

Kilbane, Simon, Andrew Toland, and Kane Pham. “Ballast Point Park.” *Landscape Performance Series*. Landscape Architecture Foundation, 2017. <https://doi.org/10.31353/cs1220>

McGregor Coxall: Ballast Point Park  
[Landzine: Ballast Point Park](#)  
[YouTube Video: Ballast Point Park Tour](#)

[Ballast Point State Heritage listing](#)

Ministerial notification provided to AILA in accordance with section 37(1)(a) of *the Heritage Act 1977 (NSW)*

link to DRAFT Management Plan under consideration:  
<https://www.darlingharbour.com/editorials/ballast-point-park>

<https://www.darlingharbour.com/getmedia/7dc24662-d13f-458c-991f-67d1801890d2/ballast-point-park-management-plan-2025-public-exhibition.pdf>