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Dear Sir/Madam,

RE: MP10_0048 - Headland Park and Northern Cove - Main Works

Attached please find the National Trust's review and commentary on the Heritage Impact Assessment report for the Main Works Development Application currently on exhibition by the Department of Planning. The National Trust contends that the Development Application cannot be approved, on the basis that this document is inadequate and inaccurate. Specific instances of these problems are set out in the attached notes.

These comments should be considered in conjunction with the Trusts submission in relation to the Headland Park - Early Works Development Application, in which the heritage significance of certain items is elaborated in more detail.

Yours faithfully

Graham Quint
Advocacy Manager
10/12/10

Barangaroo Headland Park - Main Works Application - Heritage Impact Statement – Final; October 2010 by Conybeare Morrison Pty Ltd

The following detailed comments are made in relation to the content of this report.

Detailed Commentary:

Section 2.0: In general, this section is characterised by simplistic and inaccurate historical information, as demonstrated below by select examples.

In general, this section appears to have been written to support one particular perspective, rather than an analysis of historical events to determine what were the significant historical events and trends. It contains misstatements of fact, exaggerations and unnecessary commentary on historical events, all of which degrade the quality of this work. Examples include:

The layout of the early colony was influenced by the military preference for a standard grid, but varied by the topography and wilfulness of inhabitants during periods of weaker government. (Page 4)

Comment: this statement is historically simplistic, if not inaccurate: that the “the military preference for a standard grid” and “the wilfulness of inhabitants...” were the two primary factors driving the early settlement patterns around Sydney Cove is both superficial and ignores the world history of human settlement over thousands of years..... Any examination of the historical plans would also indicate that, whatever ‘formality’ Governor Macquarie brought to the streets of Sydney, he had little effect in the area around Millers Point, as the roads and paths on the Point were little changed by his governorship.

Cockle Bay developed into the early colony’s main trading port. Warehouses and industry related to processing traded goods clustered around the bay in response (Page 4).

Comment: This is not true – it was the section of the port that catered primarily to domestic trade, not international (hence, not the “main” trading port). Sydney Cove, Walsh Bay and Millers Point were the areas for international shipping in the 19th century, partly for historical reasons and partly owing to the deep-water wharfage. It is the equivalent of suggesting that Bankstown is the main airport gateway to Sydney, because it has a higher traffic level.

A consistent development of finger wharves developed 1900–1910 to increase the efficiency of trade with large steamships and minimise the potential for disease carried by vermin. (Page 8)

Comment: Whilst the wharfage design did include some rat-proofing measures, the primary method of vermin control was the construction of a rat-proof seawall against the shoreline, necessitating the removal of existing structures. This wall remains as a potential heritage item.

Further efficiency was gained by 1910 with the construction of steel bridges between Millers Point and the Rocks over Hickson Road, but the distinction of an isolated knoll on Millers Point was lost. (Page 8).

Comment: This distinction never existed prior to the construction of Hickson Road, in 1910.)

Approximately half of sandstone knoll of Millers Point was removed to make the large flat dock of East Darling Harbour. Warehouses, many terrace houses and several streets were removed in this process. (Page 11)

Comment: An exaggeration – at Millers Point, a section of remnant sandstone slope on the west and north side of the present Clyne Reserve was removed and all of the existing excavated land was brought down to the same waterfront level. Most of Millers Point had already been cut and filled and built upon for the creation of the Dalgety Wharf complex, a fact amply illustrated in Figure 2.13 and Figure 2.14. The terrace housing on the western and southern sides of Merriman Street were removed – but only a small section of Munn Street was removed. The reclaimed waterfronts to the south of Millers Point were created from fill brought from elsewhere.

The increased efficiency of containerisation reduced the demand for waterside workers, and many of them left Millers Point. By 1982 there was deemed to be little need for the former Maritime Services Board to retain a portfolio of housing, and so all of its non-maritime buildings were handed over to the Department of Housing. (Page 11)

Comment: This ignores that, in 1982, the MSB was in the process of reorganisation and division into new smaller authorities and its property portfolio was part of that rationalisation. Further, it was a result of the 1901 land resumptions that the MSB (the successor to the Sydney Harbour Trust) acquired its residential portfolio. Hence, it became a convenient arrangement for the SHT/MSB to use the housing for its own workforce, rather than as the product of any strategic intent.

The statements here also ignore the growth of the Port of Botany as a result of government policy and in response to the fact that containerisation had led to increasing conflict between larger trucks and small residential streets, such that a government decision was taken to remove container shipping from Sydney Harbour.

Infrastructure expanded at other ports in Botany Bay and Port Kembla in this period, and the limits of the Millers Point docks for operations and expansion became clear. Sydney Harbour was moving away from being a working harbour. (Page 12)

Comment: Again, this is simplistic in its approach – the limits of Sydney Harbour had been realised in the 1960s and a program of transfer of operations to Port Botany and Port Kembla was going on from that time – the ‘working’ harbour moved away from Sydney, not vice versa.

Hickson Road came to be known as the ‘Hungry Mile’ during the 1930s Depression when decreased trade provided fewer jobs for the multitude of wharf works who would walk along this stretch seeking short-term work. Millers Point became more separate from the city by the time the Sydney Harbour Bridge was completed in 1932 during the Depression.

Comment: An analysis worthy of a primary school excursion. In the European tradition, wharf labourers (stevedores) had been employed as day-labourers for decades, if not centuries and this system, often referred to as the “bull labour pick-up”, has its own place in the history of industrial relations. The Depression merely accentuated the problems with the system, with the ranks of unemployed from around the country swelling the daily queues at the wharf gates.

Section 3.0 - this section is characterised by the inadequate scope of the analysis, as demonstrated below by select examples.

The heritage analysis deals only with those structures and works which are already identified as heritage items and makes no attempt to determine if these items adequately reflect the full range of heritage values of Millers Point. It is obvious that there are other (unidentified) heritage items in this area which are not assessed in this report.

On the designated Headland Park site, the remaining structures which are still in use or are heritage items include:

- the MWS&DB Sewage Pumping Station (SPS 0014)

- the relocated Moore's Wharf (Port Safety Facility) at the north-east corner of the site;
- the sandstone seawall at the north-west corner of the wharf platform;
- the Port Operations and Communication Centre (or Harbour Control Tower);
- Munn Reserve;
- Dalgety's Bond Store.

Comment: These are the heritage items which are currently identified in statutory planning instruments. There are grounds to believe that there remains a large section of the 1904 Concrete seawall along the northern side of Millers Point. This seawall, in engineering and historical terms, is of considerably more significance than the (identified) sandstone seawall and at no stage in the heritage impact assessment has there been any consideration of this potential heritage item. The proposed removal of this seawall is potentially a serious adverse impact.

There is also no attempt to assess the heritage significance of the Millers Point wharfage itself, created between 1900 and 1908 for the Messageries Maritimes, the French-government-owned shipping company and Dalgety and Co, the export and import agent which has played a significant role in the history of Australian agriculture. It is also possible that, upon examination, the sandstone cliffs of Millers Point would have historical and social significance.

The lack of any recognition of these items leads to the conclusion that the heritage impact assessment is deficient and does not accurately describe the heritage impact of the proposed development.

Further, in the discussion of individual elements, inaccuracies and misstatements are perpetuated, as demonstrated below:

3.2 Sandstone Sea Wall

A 120m long retaining wall of sandstone blocks protects the north-western edge of the East Darling Harbour roll-on, roll-off dock. It was built in 1913 from locally quarried stone at a time when the Sydney Harbour Trust was working to design and install a uniform system of wharves to accommodate the larger cargo ships trading with Sydney than had been the case in the nineteenth century. Moore's Wharf at the north end of Millers Point was incorporated into the major new wharf, 1A and 1B, which was created for Dalgety and finished in 1913.

This latter statement is incorrect – note Figure 2.13 states clearly that the area around Moore's Wharf was designated for Messageries Maritimes (Walsh Bay Berth 13) and 1A and 1B were on the western side of Millers Point.

Prior to 1913, the outline of the Point was a natural headland.

This latter statement is incorrect. Review of Figures 2.09, 2.10 and 2.12 demonstrate that the shoreline had been constantly modified, reclaimed and altered over the previous half century.

The construction of the new sandstone seawall squared off the western edge of Millers Point. The final reshaping of the shoreline south of the sandstone wall and across the north face of Millers Point occurred in the 1960s.

These statements are misleading in that, while some further work did occur at Millers Point in the 1960s/70s, it was relatively inconsequential in altering the shorelines around Millers Point – most work in this era occurred further south along the foreshores of Darling Harbour.

Section 7.0 - this section is characterised by the inadequate and inaccurate assessments of Heritage Impacts, as demonstrated below by select examples:

7.2.2 Shoreline and Seawall

The reconstruction of the 1836 shoreline to make the Barangaroo Headland Park is primarily motivated to improve the natural heritage of its site rather than improving the cultural heritage on its site. Nonetheless, there would be some positive impact on cultural heritage by reconstructing the 1836 shoreline. It would become easier for the public to understand the mid-to-late nineteenth-century maritime trading development of Millers Point when the shoreline of the former timber wharves is in place. The slope of the headland falling towards Darling Harbour could demonstrate why Sydney Cove was developed earlier as a port.

This statement is utter nonsense. Construction of a shoreline that clearly has no relationship to the original but is a product of a 'modern' imagination is not conservation of cultural heritage. Given the proposed design of the Headland Park, there will be no relevant "slope of the headland" to demonstrate this – and it is not established, and it is highly arguable, that "Sydney Cove was developed earlier as a port" because of the slope of the headland at Millers Point.

7.2.3 Sewage Pumping Station 14

The relocation of SPS 14 further east to a site near the foreshore at a similar height above sea level where it would be used as a public toilet is the best relocation option available from a heritage point of view. The function is appropriate for the building, considering its scale and function as a sewage pumping station. This work also provides an opportunity for the reconstruction of missing elements. SPS 14 would be diminutive in scale adjacent to Moore's Wharf Building. Being on the edge of the reconstructed headland, SPS 14 would interrupt the proposed reconstructed naturalism of the headland park. The relocation of the Federation brick and sandstone superstructure is the preferred option to mitigate the decommissioning. It would be relocated approximately 70m further east, in reasonable proximity to its original location. It would be relocated as a whole building, which is the preferred method of relocating it. The building would be adapted as public toilets adjacent to a foreshore path where it is likely to be highly visible and most used. The building is a suitable size and configuration for this new use. The metal roller shutter is not original and could be replaced or removed. The original position of the Pumping Station should be interpreted within the surface of the new Headland Park.

This section provides no assessment of the heritage impact, merely stating that this is the 'best relocation option' available to "mitigate the decommissioning". While there may be scope for adaptation and reuse of SPS 14 as a toilet facility, relocation is a very poor outcome from a heritage perspective and is driven only by the proposal to create an imaginary "naturalism". The assessment of heritage impact should acknowledge that this work represents a major loss of heritage significance. It is preferable that the design of any proposed parkland should allow for the retention in situ of SPS 14.

7.2.4 Merriman Street Cliff

The proposed space between the sandstone bedrock cliff/cutting along the western edge of Merriman Street would retain evidence of the dramatic excavation for port works up to the 1960s. The space between the new headland park and Merriman Street would also signify the extent of landscape reinstatement in the Headland Park, without covering up the sandstone cutting. The exposure of the sandstone cutting can be read as a 'fissure' across the landscape, ensuring legibility between periods of cultural development over two centuries. This treatment would have a positive heritage impact by the subtle retention of industrial

evidence while recreating the headland. The exposure of the sandstone wall is also consistent with Millers Point and the Rocks because the cliff is characteristic of Millers Point and reflects the nature of its development.

This is the most egregious example of sophistry in the assessment of heritage impact. The cliff will be entirely concealed to all viewpoints except that from directly above (or from within the underground car park) and to suggest that the remnant narrow 'fissure' represents the "*subtle retention of industrial evidence*" is just ridiculous.

7.2.9 Harbour Control Tower

No works are proposed to the tower. The reconstructed headland over the former East Darling Harbour dock would change the setting of the tower by removing the dock that led to the construction of the tower. The tower is however, a very tall structure that can be interpreted clearly with a small amount of information. Considering the relative late arrival of the tower in the Millers Point maritime port context, the natural heritage advantages of reconstructing the headland, and the ease of interpreting the tower, the change to the setting of the tower would have a minor adverse heritage impact on the tower.

Despite statements to the contrary, early plans for the Headland Park indicate that it will bear no similarity with the original Millers Point headland and there is clearly no "*natural heritage advantages*" in the park's design (an assertion which is made but isn't proven anywhere) – it will be, and is intended to be, a man-made recreation area. Consequently, the basis of this assessment is flawed. It is also disputed strongly that the proposed park would only have a "minor adverse impact". The impact of the obliteration of the tower's maritime industrial context would be a notable adverse impact.