

19 June, 2014

Mr Cameron Sargeant
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Dept Planning & Infrastructure
GPO Box 39
SYDNEY NSW 2001

Attention: Sara Roach
Via email: sara.roach@planning.nsw.gov.au

Dear Mr Sargeant

Re: Environmental Assessment – Modification of Approval re Harbour Control Tower, Barangaroo Headland Park & Northern Cove (MP10_0048 MOD 4)

The National Trust of Australia (NSW) lodges its objection to the proposed demolition of the Harbour Control Tower (HCT) at Millers Point. The Trust believes that the HCT is an important historic structure which has a positive aesthetic impact upon the character of Sydney Harbour and is an important relic of the use of Sydney Harbour for shipping.

The Trust has reviewed the documentation provided in relation to the proposed demolition of the Tower and, in particular, registers its objection to the content and conclusions in the Statement of Heritage Impact (SOHI) prepared by Margaret Rintoul & Associates.

The Statement of Heritage Impact is seriously deficient and the assertions upon which its conclusions rely are unsupportable. A number of particular issues are outlined below.

Section 4.3.1 “Individual Significance of the Port Operations and Communications Centre” of the report states that:

“The Harbour Control Tower has been transferred from the Sydney Ports s170 register and no longer functions in its designed role which results in both of the themes listed above becoming redundant.”

Section 4.3.2 “Criteria for assessing cultural heritage” of the report states that:

The Harbour Control Tower is no longer owned by Sydney Ports and has been transferred from their s170 Heritage Inventory to the Barangaroo Delivery Authority. The Tower no longer functions as a communications tower nor does it facilitate shipping movements in Sydney Harbour. The tower functioned in this role from 1992 to 2010 until transfer to the Port of Botany Operations Centre. The radar has been transferred to the top of Blues Point Tower which relays information to the Port of Botany Operations Centre. Both of the above criteria are therefore no longer relevant to the Harbour Control Tower.

Both of these statements are assertions without merit and are rejected by the Trust.

In the first section quoted above, change-of-ownership and potential change-of-use do not nullify the importance of the historic role of the HCT and its significance in the history of port operations in Sydney Harbour. If this were the case, for example, the Old Parliament House in Canberra, which is no longer used for its original purpose and whose ownership, like the HCT, has been transferred to another Government authority, would also have no heritage value.

The second section quoted above is equally wrong in regard to the historic significance of the HCT being removed by its change-of-use. With second criterion, the suggestion that its qualities as a: “prominent landmark and part of the skyline of Sydney Harbour” and a “significant element of the



maritime landscape” are removed by its change of ownership and use demonstrates a complete lack of logic.

Section 7.0 is the core of the “Assessment of Heritage Impact”. Section 7.2 states:

“Heritage Setting; The Harbour Control Tower is not a harmonious presence within Millers Point. Its demolition and removal will enhance the existing State Significant heritage character of Millers Point”

The heritage character of Millers Point is defined in the Statement of Significance for the State-significant Millers Point Conservation Area:

“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 history and situation of the Harbour Control Tower is as a maritime-related structure located on the wharf/ port areas of Millers Point and it is part of the history of the adaptation of Millers Point for these uses. These uses are central to the heritage significance of Millers Point. The judgement regarding “harmonious” appears to be an aesthetic yearning for an idealised “heritage” landscape, a concept which is contrary to the fundamental nature of heritage in the environment.

Scale; The HCT dominates not only its immediate small scale streetscapes but the entire of Millers Point due to its extreme height. Its demolition and removal will restore a harmonious sense of scale to the Millers Point village.

This statement is simply risible. On this basis, Millers Point would also benefit from the demolition and removal of the Sydney Harbour Bridge and the Botanic Gardens would benefit from the demolition and removal of the Opera House.

Materials; The materials of the HCT are concrete, stainless steel and glass which increases its visual dominance within a heritage area. Its removal will enhance and restore the visual predominance of the heritage landform and historic buildings of Millers Point.

This statement appears to ignore the fact that the HCT is proposed to be removed to establish a so-called “naturalistic” urban park, which will itself be entirely incompatible with the *“heritage landform and historic buildings of Millers Point*. The current design of the proposed Headland Park is as a European style urban parkland, utilising a few indigenous plantings and landscaping materials as stylistic features. This parkland will be in stark contrast to the *“heritage landform and historic buildings of Millers Point”*. It also ignores that *“concrete, stainless steel and glass”* already form the visual context for Millers Point. The entire city of Sydney rises behind the area from most viewing vantage points.

Throughout the SOHI, claims are made that demolition of the HCT would restore a *“harmonious sense of scale”* to Millers Point. Again, this is a baseless claim, as similar claims could be made in relation to the removal of the Sydney Harbour Bridge and virtually every multi-storey office tower in the CBD, particularly those towards the northern end. The claim also ignores that the buildings proposed as part of the Barangaroo area will also be massive in relation to the *“intimate small-scale vistas of the early streetscapes and housing of Millers Point”* and that the proposed hotel/casino building, whatever its final form, has been touted as a building of excessive scale so as to form a new landmark structure on Sydney’s skyline.

The creation of a waterfront of multi-storey buildings along the eastern side of Darling Harbour, joining those already on the western side of Darling Harbour and both sides of Sydney Cove will form an overall harbourfront visual character of massive modern buildings. This will itself impact upon the Millers Point area, leaving it as an island of (relatively) small-scale buildings surrounded by a



vertically-orientated city skyline. The role of the HCT in this view-scape is presently relatively minor and will become even more so in the future under current planning proposals.

There are many more assertions within the SOHI to which serious objection can be made, for example, that the HCT was only operational from 1992. The HCT was in operation from 1974, controlling shipping movements in Sydney Harbour, and 1992 was the year in which it took over other operations that had previously been decentralised. The constant, and erroneous, suggestion that the first eighteen years of operations are irrelevant appears to be based upon the misconception expressed in Section 4.4, that the HCT wasn't operational until 1992, which is simply incorrect.

Overall, the Trust's position is that the SOHI is inadequate and cannot be relied upon as a basis for any decision which might adversely affect the future of the HCT.

The National Trust notes that, in the NSW Ports Heritage and Conservation Register (Section 170), the HCT was rated as being of State significance. This accords with the Trust's view that the HCT should be entered on the NSW State Heritage Register, particularly now that it is no longer in use for its original purpose.

The National Trust supports the retention of the Harbour Control Tower and considers that it should be conserved and potentially adapted to a new purpose compatible with its heritage significance.

The National Trust would be pleased to discuss this submission further, should it be required. Please contact Graham Quint on 9258 0179 in this regard.

Yours sincerely

Graham Quint
Director - Advocacy