

14 December 2017

Department of Planning and Environment  
Attn: Director – Key Site Assessments  
GPO Box 39  
SYDNEY NSW 2001

Concept Proposal – Redevelopment of Cockle Bay Wharf

Dear Director,

On 14 February, 2017, the National Trust of Australia (NSW) lodged its strong objections to the Staged Development Application (Concept Proposal) for a new retail shopping centre, residential apartment tower and public domain improvements (Redevelopment of the Harbourside Shopping Centre).

The objections in that submission would apply equally if not in greater measure to the Concept Proposal for the redevelopment of Cockle Bay Wharf.

In commenting on the proposed Harbourside Tower, the Trust noted:

*In reality, the bridge and Darling Harbour itself is being trivialised by the enormity of the tower development on the harbour foreshores, in the same way that the Meriton Tower in Parramatta now makes the adjoining Parramatta River appear to be a narrow canal.*

The Harbourside Tower was proposed with a height of 166 metres (a figure not easily found in the documentation). The Cockle Bay Wharf Tower is proposed to be a much taller 235 metres.

Buildings of this height at either end of Pyrmont Bridge trivialise the historic bridge and the Bay and are in total contradiction to the original good planning principles of “stepping down to the waterfront”.

The Gross Floor Area (GFA) for the Cockle Bay proposal is 85,000 sq metres, only marginally smaller than the Harbourside GFA of 87,000 sq. metres.

As with the proposed Harbourside tower, the proposed Cockle Bay tower development will certainly have a (major) visual impact on the setting of Pyrmont Bridge.

The National Trust has long recognized the importance of the foreshores of Sydney Harbour, its associated waterways and Parramatta River. The **Sydney Harbour Landscape Conservation Area** was listed on the National Trust Register in September, 1982 and the **Middle Harbour and Parramatta and Lane Cove Rivers Landscape Conservation Areas** were listed on the National Trust Register in January, 1983. All these listings urged the maintenance of strict controls to protect the scenic and cultural values and natural beauty of the foreshores.

As early as 1828 steps were taken to protect waterway foreshores. In Governor Darling's tenure, an August 21, 1828 Government Notice from the Colonial Secretary's Office stated that -

*“The Government will further reserve to itself all land within one hundred feet of high water mark, on the sea coast, creeks, harbours and inlets.”*



Sydney Harbour is world renowned for its bushland headlands and foreshore parks and its international reputation is intimately associated with its scenic harbour vistas. However, massive tower development originally confined to the centre of the Central Business District is now being sited on the foreshores. Such development is impacting negatively on one of the world's greatest harbours.

The National Trust confirmed and reiterated its policy of 34 years when the Board of the National Trust on 29 March, 2017 adopted its *"Policy on the Conservation of the Heritage Values of the Foreshores of Sydney Harbour, its associated waterways and the Parramatta River"*.

The Policy stated: -

1. The National Trust strongly reiterates the Trust's policy of some 34 years regarding the implementation and enforcement by the Government and its agencies of strict regulatory controls including set-backs from high water mark and building heights, to protect the scenic, cultural and conservation values of the foreshores of Sydney Harbour, its waterways and tributaries and the Parramatta River.
2. High rise development is not to be sited on the foreshores and, where development is proposed, it is to be of lower scale nearer the water's edge and taking into account the local topography, stepping up from the waterways.
3. Generous and easily public accessed foreshore reserves and parks are to be established, not just limited public access and narrow walkways.
4. There is to be no major overshadowing of foreshore parks and waterways from new development proposed on or near the foreshore.

As this project is being assessed as State Significant Development approved under Part 4, Division 4.1 of the Environmental Planning & Assessment Act, the relic provisions of the Heritage Act would not apply,

The National Trust finds this "switching off" of the Heritage Act in this way as totally unacceptable.

The Historical Archaeological Assessment prepared by GML Heritage concludes that *"beneath the eastern half of the Cockle Bay Wharf building there is considered to be a high potential for archaeological structures and deposits associated with the maritime development of the site from the 1830s onwards. If present, these archaeological remains would be of local significance, although if well preserved and extensive, the earlier remains, in particular the 1840s-1850s seawall, could be of state significance."*

In April 2013 the ***"Darling Harbour Non Indigenous Archaeology"*** was listed on the National Trust Register.

The Listing Report set out the history of the Cockle Bay Archaeology Precinct which forms an important component of the Darling Harbour Non Indigenous Archaeology –

### **Cockle Bay Archaeology Precinct**

The first mention of what later was to be known as Darling Harbour is found as early as 1788, under the name of Long Cove when it was suggested that Government House should overlook its waters from the ridge where Saint Andrews Cathedral stands today. Although subsequently



land grants were made around its foreshores these were for residences rather than for trade or manufacturing. The rocky shores were still covered with scrub and shell fish, a staple diet of the aboriginal people, giving rise to the alternative name of Cockle Bay.

By 1791-2 Officers quarters and a magazine were built near where Erskine Street now lies. In the early 1800s a military bathing house was constructed which stood until 1863. This site now lies beneath the roadway and may have substantial remains. The peninsula where the bathing house was built became known as 'Soldiers Point' which was marked on maps until at least the 1850s.

In the early days of the infant colony there was little trade with the outside world; American ships traded items in short supply in Sydney, and British ships brought convicts and a few supplies before sailing away in ballast as there was little to export. By 1807 activity had increased with Sydney becoming a regular port of call for shipping between Europe, China, and India and it was also a refitting port for the many American and British whalers in the Southern Oceans. British ships were concentrated around Sydney Cove with the foreign ships in Neutral Bay. Farm Cove was reserved for the Domain thus debarring its deepwater anchorage from shipping. This left only Cockle Bay to accommodate the overflow of shipping from Sydney Cove.

At this time the head of Cockle Bay was still tidal mudflats extending nearly as far as the line of the intersection of George and Barlow Streets. The brickfields were established by about 1791 at the head of Cockle Bay on the site of Central Railway Station today . By 1822, signs began appearing of the commercial development to come, Market wharf appears on the 'plan of the Town and Suburbs of Sydney' of 1822 where produce from Parramatta was carted up over the hill to the markets Macquarie established in 1813.

Two wharves were built to receive produce from Parramatta and Windsor, and a new steam driven mill, together with its own deep water wharf, established to cope with the increased supply of wheat from those regions. This mill, founded by John Dickson in 1815, was located on the south east shore of Cockle Bay where its mill pond was serviced by the streams flowing down from Surry Hills. By the 1830s Thomas Barker who had established another steam mill nearby, subdivided the area around his factory and developed other land nearby.

The name Cockle Bay was changed to Darling Harbour in 1826, and as the level of commerce through it grew, its importance became established.

The 1840s saw new wharves built to handle the increased coastal trade, wheat came to the wharves from Van Diemens land together with the farm produce from the Illawarra region and fresh vegetables and fruit from the farms of Lane Cove and around Parramatta. All imported goods were loaded on bullock carts and pulled up the steep slopes from the wharves; the age of railways lay just ahead for Australia, although another new technology had arrived in Sydney with the completion of the gasworks on the shores of Darling Harbour bringing lighting to streets and wharves.

In the next decade the first move towards improved communications with the interior commenced with the construction of the railways. The first railway to Darling Harbour was constructed by 1855 from the new rail terminal at Redfern. The early 1850s were a period when the discovery of gold dispersed the population and forced prices up. However, when stability returned the growth of the city led to the reclamation of part of the mudflats at the head of Darling Harbour. The reclamation of the head of the harbour was carried out with the spoil from the Sydney railway yard excavation which was used to fill both the mill pond and the area beyond . By the end of the decade a private company had constructed a toll bridge to link the city with its north western suburbs. The bridge finished in 1857, was of timber with an opening span.



In 1864 the Harbours and Rivers Branch of the Public Works Department fronted this reclaimed land with a stone dyke completed in 1865. Permission was also granted for a number of private wharves to be constructed along the eastern shore of Darling Harbour. By 1869 it was clear that produce from the central west and south western districts would no longer be brought to Sydney by road, and the amount of wool would greatly increase. With baled wool being loaded at Bathurst and Goulburn it could be exported by direct transshipment from rail trucks at Darling Harbour. Accordingly the Government provided additional rail sidings and a new iron wharf. This was completed in 1874 to meet the needs of larger steam ships for deep water. Apart from recession towards the end of the 1870s the trade and importance of Darling Harbour grew.

In 1881 there was a move to extend a railway line along the eastern side of Darling Harbour and from there via a tunnel to Circular Quay. This was backed by those who exported their wool through warehouses at Sydney Cove to Clipper Ships moored at Circular Quay. The plan would have hastened the city's commercial development and provided direct rail communication with the wharves much more cheaply than could have been done by the proposals to extend a goods railway to Circular Quay. The plan was abandoned in the depression of the 1890s, and the goods yards at Darling Harbour were steadily improved. The absence of goods railway to Circular Quay and the ferry traffic to the northern suburbs saw cargo vessels diverting to Darling Harbour, and Circular Quay receiving passenger vessels.

The 1890s saw the development of hydraulic power which was used to operate cranes and wool presses more efficiently. The hydraulic pumping station was built on the western shores of Darling Harbour to provide the power for these operations. The new Pyrmont Bridge was opened in 1902, with a swing span of world class operated electrically.

With new area reclaimed and the demolition of substandard properties, the opportunity was taken to relocate the city markets close to the railway facilities, which were constructed before World War 1. Vegetable production was mainly a Chinese enterprise and there had been a Chinatown of sorts along Darling Harbour since the 1870s. After the war larger goods facilities were constructed and the last reclamation used the fill from the construction of the city underground railway.

Factories and marine chandlers, transport companies and market warehouses, wool stores and other enterprises were all operating at Darling Harbour, but many closed during the depression in the 1930s. Finally the direct link between rail and shipping facilities grew less important with the development of container terminals and road transport, and the closure of the railway yard became inevitable. Early in 1984 the New South Wales Government announced its intention to develop the area for tourism, education, recreation, entertainment, cultural and commercial activities. The area was developed with these aims in mind as a present to the people to celebrate the bicentennial in 1988.

The Listing Report's Statement of Significance sets out the importance of the Cockle Bay Archaeology Precinct –

### **Cockle Bay Archaeology Precinct**

The site at the east side of Darling Harbour, west of Sussex Street and north of Pier Street (Cockle Bay Precinct) is historically significant for the development of industry, technology, and transportation in Australia with industrial development of Darling Harbour beginning in 1813 with the erection of the first steam engine in Australia. This heralded the industrial revolution and Darling Harbour was also the site where refrigeration was developed in Australia. The site has social significance for the development of industry and the adoption of technologies in the area which benefited the wider community in a range of areas including public health. Part of the site includes Chinatown which has cultural significance for the Chinese community whose association



with the area stretches back to c1870. The site has significant research potential as an archaeological resource which can inform about early industrial, technological and transportation developments in Australia. The archaeological resource of the area is classified as rare. The site has the potential to reveal information not available from any other source or archaeological site. Most of the above ground features have been demolished. 2008-2009, archaeological excavations at Darling Walk indicate that a significant archaeological resource is extant. Cockle Bay was named for the large middens and thus has indigenous archaeological significance.

The Trust rejects this development proposal and calls for new proposals in keeping with the principles outlined above.

Yours sincerely,

Graham Quint  
Director - Advocacy