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

Dear Sara,

**RE: City's submission to Barangaroo Headland Park Section 75W
Modification, Demolition of former Sydney Ports Harbour Control Tower**

I write in relation to Modification 4 to the Barangaroo Headland Park Project Approval proposing to demolish the existing tower formerly used as the Harbour Control Tower by Sydney Ports Corporation.

The Harbour Control Tower ("the Tower") makes a significant positive contribution to the character and significance of the locality and should be retained.

The proposed demolition of the Tower will dramatically alter the physical, cultural and historic landscape and the understanding of Millers Point as it evolved throughout the twentieth century. The removal of the Tower will erode part of the significant and intrinsic character of the Millers Point area and further erode physical evidence of the former wharves and port facilities.

The City does not agree that the Tower is obsolete and incompatible with the existing and future locality. The strong heritage and cultural significance of the tower is detailed below:

- The Tower is a key remnant of the historical layering of the area;
- The Tower is a part of a series of installations around Sydney Harbour that represent the long processes of establishing visual control and guidance over maritime in Sydney Harbour;
- The Tower contributes to the living cultural and historical landscape and is a clear connection with visual, functional and historical interfaces;
- The Tower has aesthetic significance as part of the skyline of Sydney Harbour. At 87m above sea level the Tower is a powerful landmark that demarks the entrance to Darling Harbour and provides important visual links between Millers Point and other parts of the harbour and the City;
- The Tower is evidence of former functional practices and processes occurring in Sydney Harbour over several decades – the spread of maritime

industries for shipping, fishing and tourism and natural limitations within the Harbour for low-rise observation. The Tower is a significant element of the maritime landscape of Sydney Harbour and contributes to the overall understanding of the harbour as a maritime port. The tower represents the final culminating stages of port development¹;

- The Tower is a monumental engineering structure, which when juxtaposed against smaller scale Victorian terrace development contributes to the dramatic layer of historic events throughout the area; and
- The Tower is rare in Australia, and possibly rare at an international level. A comparative analysis included as part of the *East Darling Harbour Concept Plan Heritage Impact Statement* with other port control structures in other Australian port cities such as Melbourne and Newcastle, provides evidence that the Sydney Port Control Tower has a level of aesthetic refinement superior to its counterparts.

Further, the National Trust recognises the significance of the control tower in its *Industrial Heritage Site Listing Report* as follows: *'The Harbour Control Tower is significant as a part of a collection of navigation marks, light towers and light stations which are relics of the long history of control and management of maritime operations in the Port of Sydney and, as the most prominent expression of this history, the Tower symbolises two hundred years of commercial shipping in Sydney Harbour. The Tower is a local landmark and forms part of a notable group of landmark structures in the vicinity of Sydney Cove, including the Harbour Bridge, the Opera House, Blues Point Tower and the Hammerhead Crane.'*

The City supports the retention of the structure, with or without an alternative use. The structure need not be profitable, particularly as a significant heritage and landmark structure owned by a public authority. Periodical maintenance to retain the structure as it is today would ensure that the historical association and value is maintained.

However, the Tower has existing services and amenities for potential longer term reuse. The reinforced concrete shaft of the tower is 4.9 metres in diameter with an internal lift, stairs and service risers, and is topped by a three storey stainless steel and glass observation area containing toilets and lockers. The City would support the re-use of the Tower and opening to the public as an artwork, landmark or observatory.

¹ The engineering endeavours in Millers Point started with the construction of windmills, Fort Phillip and the establishment of quarries in the 1800 -1830s, the Argyle Cut commencing in the 1840s, the terracing of Observatory Hill in the 1860s and the establishment phase of maritime industries in the period 1850-1890s. The latter included deep water wharf construction such as Central and Parbury's that presented 'problems never before encountered in the city'. Endeavours proceeded into the twentieth century with the construction of the Dalgety Wharf and the Walsh Bay Wharves, the Pottinger Street realignment, Hickson Road and associated Munn Street rock face and Hickson Road overbridges by the Harbour Trust in the early 1900s. The construction of the Sydney Harbour Bridge in the 1930s was followed by later by the Cahill Expressway circuit in the 1950s and conversion of the finger wharves of Darling Harbour by the Ports Authority in 1973, that included the cutting of the sheer cliff face and the construction of the control tower on the western side of Merriman Street. Both the Merriman Street rockface and the Ports Facility Control Tower represent the final stages of these engineering challenges and, as the last remnants of the ports facilities at Millers Point, they provide an important opportunity for direct interpretation of the port era that had a defining influence on the development of Millers Point.

The area immediately surrounding the base of the Tower should be landscaped and trafficable so that visitors can get close to the base. The curved section of carved rockface around the tower could remain fully exposed, maintaining the lower entry to the tower. This would conserve physical evidence of the level to which the headland was excavated to form the ports facilities.

The BDA's proposal for the creation of an 'oculus' circular opening letting light into the future cultural facility and sandstone cutting below is an inadequate interpretation of the Tower's heritage. The Tower should be retained in its entirety as an historical landmark to complement the cultural facility below. It's adaptive re-use as an artwork or observatory would enhance the setting of the Headland Park and the cultural facility and establish a unique public viewing opportunity and attraction.

If the Agency is minded to approve the request to demolish the Tower, the detailed design of this opening requires further refinement as follows:

- Interpretation of the Tower should be included on the concrete wall upstand in addition to the new paths around the site. The introduction of interpretation on the wall would achieve greater visual impact;
- The proposal for a wall 1100mm-1320mm high surrounding the void opening has safety implications in the event that a visitor climbs the wall and is unable to get out of the void; and
- The skylights shown on the drawings are inconsistently located and this should be clarified in the documentation.

The City opposes the demolition of the Tower and supports its conservation in situ and re-use as a public artwork or observatory Tower.

Should you wish to speak with a Council officer about the City's submission, please contact Russell Hand, Senior Planner, on 9265 9333 or at rhand@cityofsydney.nsw.gov.au.

Yours sincerely,



Graham Jahn AM
Director
 City Planning | Development | Transport