2 March 2017

The Hon Dr David Kemp AC  
Chair, Australian Heritage Council  
GPO Box 787  
Canberra ACT 2601

By email: heritage@environment.gov.au

Dear Dr Kemp,

Nomination of the Governor’s Domain and Civic Precinct in Sydney to the National Heritage List

Australia ICOMOS (AICOMOS) supports the nomination of Sydney’s Governor’s Domain and Civic Precinct to the National Heritage List in accordance with the Environment Protection and Biodiversity Conservation Act 1999. AICOMOS. Australia ICOMOS congratulates the Department of Environment and Energy on their work and commitment to completing the nomination for this most important Australian cultural landscape.

That said, we feel that, while the analysis against criteria is adequate, many of the statements in the nomination’s Fact Sheet could be strengthened. The nomination may also benefit from additional peer review by heritage professionals with knowledge and expertise in the subject area and themes, including those with expertise in archaeology and in cultural landscapes.

There are a number of specific bodies of relevant research that may not have been consulted for the nomination. Australia ICOMOS would be happy to provide a list if requested.

A number of more detailed comments from our members follow this letter and we hope these are of assistance.

Australia ICOMOS appreciates the opportunity to comment on this important nomination to the National Heritage List. Please contact Australia ICOMOS if you require further information.

Yours faithfully

Ian Travers  
President, Australia ICOMOS
Nomination of the Governor’s Domain & Civic Precinct, Sydney to the National Heritage List

Selected comments from Australia ICOMOS members, February 2017

Historical and Associational Values

- Include key Aboriginal ceremonial sites such as the Bora Bora ground in the RBG.
- Governor Phillip’s interaction with Aboriginal people is important as he was the nominated colonial protector and arbitrator.
- There should be mention of Bennelong’s daughter Dilibong and his wife Barangaroo, who were buried within the Domain, the grounds of First Government House.
- The Nomination suggests that the establishment of colonial government places and institutions in Sydney set the pattern for the development of the centres of other major Australian cities. The precinct does not represent ‘town planning’ as we know it today – which is a late Victorian/ Edwardian concept but is ‘colonial town planning’ with buildings sited by military engineers to separate the convict population from the Governor and Military and for reasons of health (hospitals and barracks on the ridges). In Sydney the typical colonial military planning and the grander urban plans of the Governor were diluted by the necessities of survival in an alien geophysical environment.
- ‘Between 1788 and 1823, New South Wales was ruled by the Governor, with instructions from Britain and no representation by the colonial population — displaying ‘all the attributes of a military autocracy’ (CHCAP. 2003)’. Alan Frost in his 2011 book discusses the establishment of the legal doctrine which was a whole new approach due to the nature of the colony. It was not a military law but one established to provide for military and non-military members of British society.
- That convict transportation and penal settlement was the basis for settlement is surely key to the significance of this location.
- There is no mention of the role of convicts in building many structures - the penal labour force and use of enforced labour, or of the role of Hyde Park Barracks in providing accommodation for major increased numbers of convicts form 1815.
- The exchange of scientific and cultural ideas in the precinct could be further developed, as could details of exchanges with Aboriginal people. For example visits to the early colony by other Nations; and to perform scientific research.
- It should be recognized that the RBG is one of the earliest botanic gardens in the world and has importance to natural history in Australia.
- The importance of the plantings in the RBG/Domain was not just for recreation and enjoyment but part of the process of identifying plants that would be economically useful. The first plantings of certain Colonial species such as Norfolk Island pines are believed to be in the RBG. It was not just a pleasure garden for the Governor. This aspect of the place dates from well before the Herbarium.
- The beginning of the RBG coincided with Elizabeth Macquarie’s birthday, 13 June 1816, and this was also the day that Mrs Macquarie’s Road was opened, designed by Elizabeth. She was also involved with Macquarie Place and provided an initial design for the Obelisk, although it was ultimately redesigned by Greenway.
Throughout the nomination there is ambiguity about the national (Australian) history (as opposed to heritage) of the precinct. The NSW colony reported directly to the Colonial Office and historically was more isolated from other Australian colonies than the nomination suggests.

The listing does not include landscape feature names of historical associational value e.g. Bennelong Point.

Some of the historical resources used are not standard history references for colonial Sydney. For example, Alan Frost’s 2011 books on Botany Bay and the First Fleet should be the main references for details of the First Fleet and settlement at Botany Bay.

The El Nino event is not confirmed – scientific analysis suggests it is likely but it is currently not confirmed. Gergis, Karoly and Allan (2009) state that ‘Although the 1788–1791 period experienced a marked La Niña to El Niño fluctuation according to palaeoclimatic data, the cool and warm intervals in Sydney over this period cannot be conclusively linked to El Niño–Southern Oscillation (ENSO) conditions’.

The Nomination states ‘...it was the men and women of the Cadi that they first encountered as they came ashore and established the camp’ – The British did not encounter any Aboriginal people until Phillip kidnapped Bennelong and Colebee and it was still later before friendly relations developed.

The nomination states that: ‘Marriage effectively freed a woman convict from her servitude to the state; whatever her sentence, she exchanged the authority of the governor for the authority of her husband’. Karskens’ research in The Rocks disputes this statement about the lives of convict women and it is contentious and not meaningful. Many convict women had a number of husbands, they were in high demand and few of them fitted easily into the model suggested by this statement.

There is scope for a further theme (or a separate nomination?) for trade networks, mercantile and private developments such as Moore’s Steps and the surviving 1840s town houses on the western side of Macquarie Street, the woolstores, Customs House and development of Circular Quay.

**Aesthetic and Technical Values**

- There could be further analysis of the National significance of architectural and technical values (Criterion (d)) such as the extent to which the design of many government buildings reflected colonial aspirations and the organisation of public services.

- The precinct contains rare surviving examples of building types that were developed for use throughout the British colonies. For example, the Rum Hospital is one of the earliest surviving examples of this type in the world, not just Australia. The other examples are in the Caribbean.

- The nomination talks loosely about architectural style. The buildings by the Royal Engineers were designed to combat the extremes of climate and disease found in hotter climates. It is the evolution of the type that is of importance. Many of the buildings on Macquarie Street were walled compounds, characteristic of buildings planned by the Royal Engineers.

- More could be made of the significance of the institutional buildings associated with the governing of NSW, including buildings that replaced the residences that were grouped around FGH in Bridge Street.
There is no reference to the writings of Joy Hughes and James Broadbent on Greenway (Broadbent & Hughes 1992, 1997) No mention is made of the work of the series of Colonial and Government Architects that survives in this precinct: such as Lewis, Blacket, Dawson, Barnet, Vernon and others into the twentieth century.

There could be a comparative analysis that places the Precinct elements within the context of the British colonial network. Hong Kong for example retains an 1840s official residence designed by the Royal Engineers.

Consideration should be given to the aesthetics of the streetscapes with their harmony of styles, stone textures and legibility of historic forms, combined with the picturesque charm of St. James Church spire. The journey northwards along Macquarie Street, with its sea vistas, and the contribution of the garden textures in the Civic Precinct would be worthy of consideration for national significance.

Archaeological Value

The nomination states that ‘Archaeological relics of these mills may remain within the Royal Botanic Garden’. This should perhaps cite the results of the archaeological report that relates to Palmer’s Mill, which is online (http://www.caseyandlowe.com.au/sitecon.htm) or other papers published following this work by Casey 2007, 2010. Also Dr Casey’s PhD sheds considerable light on this area generally and on early uses of the site.

The nomination contains no statement about the values of the archaeological landscape and its expression of British imperialism.

Consideration should be given to the archaeological value of the remaining early standing buildings, including the Rum Hospital; the 1817-1821 building of the Government Stables (Conservatorium); and Hyde Park Barracks (1817-1819).

There is no mention of the surviving archaeology of the Conservatorium site or its archaeological collections or displays.