



Our ref: DOC20/853943

Mr David Glasgow  
Department of Planning, Industry and Environment  
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By email: david.glasgow@planning.nsw.gov.au

Dear Mr Glasgow

**Response to Submission comments for Harbourside Shopping Centre Redevelopment (SSD 7874)**

Thank you for your referral dated 16 October 2020 inviting further comments from the Heritage Council of NSW on the above State Significant Development (SSD) Response to Submissions (RTS) for amended concept proposal.

HNSW provided comment on an earlier version of the RTS in a letter dated 29 April 2020 (incorrectly signed as 29 February 2020). HNSW understands from the planning documents that the concept proposal has been further revised since the previous RTS. The following documents have been reviewed from the second RTS documents:

- *Response to Submissions and Further Amended Concept Proposal Redevelopment of Harbourside Shopping Centre Darling Harbour prepared by Ethos Urban dated 12 October 2020*
- *Response to Submissions Heritage Impact Statement Harbour Redevelopment prepared by Curio Projects dated 2 October 2020*
- *Response to Agency Submissions Harbour Shopping Centre Redevelopment prepared by Ethos Urban dated 12 October 2020*
- *Virtual Ideas, Harbourside Private View Photomontage and 3D report, dated September 2020*

The concept proposal has been further amended from the EIS and previous RTS stage and now seeks approval for the following with respect to heritage impacts:

- Reduction in height in the northern part of the building podium from RL 25m to RL 17.6m and part RL 13.75m
- Provision of new public open space "Guardian Square" above the reduced northern podium which includes views to Pyrmont bridge.
- Increase in height of the residential tower from RL 153.76m to RL 166.95m aligning with the Draft Pyrmont Place Strategy. This equates to an adjustment in the Gross Floor Area.
- The overall footprint of the basement was reduced, but an additional basement level is proposed to increase it to 4 levels (i.e. to an RL -13.2m).

The project site is immediately adjacent to the State Heritage Register item Pyrmont Bridge (SHR No. 1618) and encompasses a part of the early Sydney Harbour foreshore. The foreshore contains potential for maritime and historical archaeological deposits and relics of local and State significance.

The further reduction in height of the northern podium and introduction of the new public open space level is supported as it provides a further set back and separation from the Pyrmont Bridge. The increased physical set back from Pyrmont Bridge is an improvement when compared to the first two submissions considered. This is based on review of Concept Proposal Indicative plans and 3D renders when viewed looking west across Darling Harbour, and photomontages developed for 50 Murray Street, Pyrmont. However, the view line from 50 Murray Street across Darling Harbour (which provides a visual setting for the Pyrmont Bridge) is impacted by the current height of the northern podium block. HNSW notes that the documents identify the current building envelope may be refined during detailed design and recommends a design which aims to retain the visual link of Pyrmont Bridge and Darling Harbour would be preferred as it provides context to the SHR item, and should be addressed by the SSDA stage 2 detailed design. This would be consistent with previous conditions recommended for detailed design to be sympathetic to the SHR listed values of Pyrmont Bridge.

The previous commentary on Maritime archaeology provided on 29 April 2020 remains unchanged. The project still not addressed the advice that a maritime archaeological assessment is required to inform the concept approval. HNSW notes the adoption of previously recommended conditions.

The project has noted the benefit in testing to inform detailed design and agrees that it would be appropriate to undertake testing to inform the Stage 2 detailed design for the project and its approval. HNSW reiterates the previous advice that there is a need to clarify the Aboriginal archaeological potential at the site and the need for these combined studies to guide the final design to best manage significant finds during the project.

Noting the archaeological potential for State significant maritime and historical archaeological resources in Darling Harbour, HNSW reiterates the need for the Concept approval to include a condition of consent with clear guidance on how to manage state significant archaeological fabric during the SSDA.

**HNSW recommends the above comments and conditions for consideration by DPIE in determining this SSD Concept Proposal. Amended conditions recommended by the RTS referred in October 2020 are identified in underlined below below.**

**1. Final Harbourside Redevelopment Detailed Design to be sympathetic to the SHR listed values of the Pyrmont Bridge:**

The proponent shall work on the final design detailed of the proposed Tower and its associated elements (including the northern podium), to be sympathetic in its aspect and final form (including colours and materiality) to the Pyrmont Bridge. This shall act to further reduce the visual impact of the new development to the item. The detailed design for the north podium should aim to retain the visual link of Pyrmont Bridge in its context within Darling Harbour when viewed from the west. The final design shall resolve and improve the interface between the Pyrmont Bridge and the new Harbourside shopping complex, including sensitively managing the relationship between the new development and the extant bridge approach, based on the SHR listed heritage values.

**2. Heritage Interpretation Strategy:**

A Heritage Interpretation strategy shall be prepared by the Proponent for the redevelopment and submitted within 6 months of the approval of the SSDA. The HIS

shall include an outline of public domain artworks, interior as well as exterior design elements/features and approaches to interpret the site's history. The Strategy shall include details of on-site secure storage for relics recovered during the project, public display of archaeological objects, active incorporation of archaeological and historical information, images and stories on the site's history and evolution shall be provided in Stage 2 works. These shall include appropriate use of multi-media, digital resources, landscape works, and materials (e.g., railway tracks).

**3. Management of State Significant Archaeological Resources (Historical, Maritime and Aboriginal):**

The project shall ensure that archaeological testing is used to inform the Stage 2 SSDA detailed design. The project shall use this information to minimize impacts to State significant archaeological resources (historical, maritime and Aboriginal) within the project area. Subsequent development application/s must demonstrate how the design has been informed by the results of the archaeological testing. The results of the archaeological testing must be documented in a report which outlines opportunities for conservation *in situ* (as a preference), development and interpretation.

**4. Maritime Archaeological Assessment:**

The proponent shall engage a suitably qualified and experienced maritime archaeologist, with understanding of the effects of dredging and reclamation processes on former submerged maritime infrastructure sites, to prepare a maritime archaeological assessment for the project within 6 months of the approval of the SSDA. The Assessment shall be used to inform the testing and detailed design of the Stage 2 SSDA. This should include the following:

- a) Remote sensing and/or diver surveys of the seabed under any piled areas that currently form waterfront or paved areas of the proposed development.
- b) Any geotechnical and borelog information should be considered in this assessment and the maritime assessment should be used to better inform the testing program.

HNSW reiterates that archaeological testing should be undertaken by the Proponent ahead of detailed design being confirmed for Stage 2 of the SSDA. This program may be undertaken under *Heritage Act 1977* approvals or through investigations to inform the EIS under s.4.41(3) of the *Environmental Assessment and Planning Act 1979*. Reassessment of the impacts to these heritage values should take place in line with this letter and with previous comments supplied for the EIS in February 2016.

If you have any questions regarding the above advice, please contact Felicity Barry, Senior Historical Archaeologist at Heritage NSW on (02) 9995 6914 or [Felicity.Barry@environment.nsw.gov.au](mailto:Felicity.Barry@environment.nsw.gov.au).

Yours sincerely



4 November 2020

**Dr Siobhan Lavelle, OAM**

Senior Team Leader, Specialist Services

Heritage NSW

Department of Premier and Cabinet

**As Delegate of the Heritage Council of NSW**