



Mr David Glasgow
A/Team Leader
Key Sites Assessments
Department of Planning and Environment
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By email: Matthew.rosel@planning.nsw.gov.au

Dear Mr Glasgow

Amended submission to Notice of Exhibition: Response to Submissions for amended concept proposal for the redevelopment of the Cockle Bay Wharf (SSD 7684)

I refer to your letter received on 11 July 2018 notifying the Heritage Council of NSW of the public exhibition of, and inviting comments on, the Response to Submissions (RtS) for the above State Significant Development (SSD). This letter replaces the previous correspondence issued by the Heritage Division under delegated authority, dated 8 August 2018.

Several documents exhibited with the RtS reviewed to provide this assessment, including:

- *Response to Submissions - Wheat Road, Sydney - Cockle Bay Wharf Redevelopment (SSD 16_7684)*, prepared by Ethos Urban, dated 5 July 2018;
- Letter report entitled '*Re: Amended Concept Proposal for Cockle Bay Wharf (SSD 7684), 17-27 Wheat Road, Sydney – Heritage Response*', prepared by Weir Phillips Heritage, dated 26 April 2018; and
- Letter report entitled '*RE: Response to Heritage Council letter dated 17 December 2017 – Maritime Archaeology*', prepared by Cosmos Archaeology, dated 19 April 2018.

Archaeology

It is noted that the amended SSD site adjoins State Heritage Register item Pyrmont Bridge (SHR 01618) and is situated over a section of the early Sydney Harbour foreshore. Previous archaeological investigations at nearby Barangaroo found that the area was intensively used for harbour-side docking, wharves etc. Therefore, it is highly likely that archaeological evidence of shipping-related activities and other industrial activities remain within parts of the subject site, under the later layers of fill. These remains have been assessed as likely to be of both potential state and local heritage significance.

The Response to Submissions was reviewed in relation to maritime archaeology and most of the concerns have been satisfactorily addressed in the letter '*RE: Response to the Heritage Council letter dated 17 December 2017 – Maritime Archaeology*' by Cosmos Archaeology. Since previous Heritage Council comments were provided in December 2017 *South Steyne* has been permanently moved from Cockle Bay and there is no opportunity for it to return in the future. Accordingly, the proposed redevelopment of Cockle Bay Wharf will not have an impact on the *South Steyne*.

However, the Division disagrees with the argument in this response letter concerning the significance of the South Steyne which states:

*“the heritage significance of the S.S. South Steyne is in no way directly related to its current position at Harbourside Wharf **or any other future locations. As a movable Heritage Item, its significance would not be impacted by a change in location or a change of the surrounding environment and landscape**”.*

The statement that the significance of this item is in no way directly related to its current position at Harbourside Wharf or any other future locations is at odds with the significance values identified in the State Heritage Register (SHR) listing. As outlined in Criteria d) [Social significance] “It epitomised the Manly ferry as part of Sydney's image and its popular urban culture; it remains, like the Harbour Bridge, a powerful piece of Sydney imagery”. As identified in the SHR listing, the *South Steyne* is very much tied to Sydney Harbour and its location is a significant component of the listing.

It is recommended the supporting letter prepared by Cosmos Archaeology dated 17 December 2017 is amended to acknowledge both the movement of the *South Steyne* from Cockle Bay, and therefore outside the purview of this SSD assessment, and to remove the reference to “any other locations” and the remainder of the sentence as identified in bold in the above statement.

The previous conditions recommended in previous correspondence for the EIS for this project dated 7 December 2017 for managing impacts to Maritime Archaeology and historical archaeology remain of value and are reproduced below.

Built Heritage

The 14 February 2016 submission by the Heritage Division provided the following three comments:

1. *The proposed new level 02 direct pedestrian bridge connection from the shopping centre podium outdoor space to Pyrmont Bridge shall be deleted to avoid visual and physical impacts on Pyrmont Bridge.*
2. *All projecting building elements above the Pyrmont Bridge deck level should be further set back from the Bridge to further open views to and from the Bridge and minimise visual impact of new buildings on the Bridge.*
3. *Details of the proposed Interpretation Strategy, public domain artworks, and interior as well as exterior design features to incorporate on-site secure storage, or where appropriate, 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).*

We note that point 2 has been addressed by moving the proposed concept envelope of the tower away from the bridge. It is unclear if point 1 has been addressed, however we acknowledge that point 3 will be addressed in the detail design phase.

We also note that the RtS included a response to the City of Sydney Council submission relating to heritage impacts to the Corn Exchange (SHR 01619); further to this we note that the Shelbourne Hotel, which is listed on a State agency s170 heritage register, may also be impacted.

Both the Corn Exchange and the Shelbourne Hotel buildings present early elevations to both Sussex and Market Streets and make important contributions to the streetscape and scale in relation to other Victorian warehouse buildings along Sussex Street. The proposed elevated pedestrian deck bridge to connect Market Street to The Pyrmont Bridge will adversely impact the historic streetscape, views, and the aesthetic values of these items. Whilst the heritage report prepared by Weir Phillips Heritage addresses the visual impacts of the pedestrian bridge to the Corn Exchange building and indicates these are acceptable, it does not address the impacts to the Shelbourne Hotel. We disagree with this assessment and recommend that the location of the proposed bridge should be modified to minimise the visual impacts on these items.

Recommended Conditions of Consent

Maritime Archaeology

1. Any proposed demolition and excavation works should be monitored by a suitably qualified and experienced maritime archaeologist who has an understanding of the effects of dredging and reclamation processes on former submerged maritime infrastructure sites.
2. All the proposed archaeological maritime heritage works need to be undertaken by a suitably qualified and experienced maritime archaeologist.
3. There should be clear inclusion of what will be done if unexpected sites are discovered during the demolition process and how they will be recovered and or excavated, the observation techniques to be employed, and if in situ preservation and interpretation can be undertaken.

Historical Archaeology

4. An archaeological consultant shall be nominated for the works. The consultant shall have appropriate qualifications and experience commensurate with the scope of the Major Project works. The name and experience of this consultant shall be submitted to the Heritage Division, Office of Environment and Heritage for approval prior to commencement of works.
5. All construction contractors, subcontractors and personnel are to be inducted and informed by the nominated archaeological consultant prior to commencing work on site as to their obligations and requirements in relation to historical archaeological sites and 'relics' in accordance with guidelines issued by the Heritage Council of NSW.
6. The applicant must retain all state significant archaeological resources *in situ* and unharmed. Archaeological test excavation should occur in the first instance to guide redesign to avoid harm to these resources.
7. All affected historical archaeological 'relics' and/or deposits of local heritage significance are to be subject to professional archaeological excavation and/or recording before construction works commence which will impact those 'relics'. A Research Design including an Archaeological Excavation Methodology must be prepared in accordance with Heritage Council guidelines. Those documents shall be prepared for the approval of the Department of Planning & Environment upon receipt of advice from the Heritage Division of the Office of Environment & Heritage.
8. At the completion of all archaeological works on site, a copy of the final excavation report(s) shall be prepared and lodged with the Heritage Council of NSW, the City of Sydney and the Department of Planning and Environment.
9. The information within the final excavation report shall be required to include the following:
 - a. An executive summary of the archaeological programme;
 - b. Due credit to the client paying for the excavation, on the title page;
 - c. An accurate site location and site plan (with scale and north arrow);
 - d. Historical research, references, and bibliography;
 - e. Detailed information on the excavation including the aim, the context for the excavation, procedures, treatment of artefacts (cleaning, conserving, sorting,

- cataloguing, labelling, scale photographs and/or drawings, location of repository) and analysis of the information retrieved;
- f. Nominated repository for the items;
 - g. Detailed response to research questions (at minimum those stated in the Department of Planning & Infrastructure approved Research Design);
 - h. Conclusions from the archaeological programme. This information must include a reassessment of the site's heritage significance, statement(s) on how archaeological investigations at this site have contributed to the community's understanding of the Site and other Comparative Site Types and recommendations for the future management of the site;
 - i. Details of how information about the excavations have been publicly disseminated (for example, include copies of press releases, public brochures and information signs produced to explain the archaeological significance of the sites).
10. A suitable repository for all historical archaeological artefacts recovered from the archaeological investigation shall be identified by the applicant with the provision of the final excavation report. This location and facility must address the long term storage and conservation needs of these artefacts. Artefacts shall be appropriately catalogued to enable review by researchers in future.
11. The results of the archaeological fieldwork should be used to inform an Interpretation Plan to guide the future incorporation of the findings from the works in communicating the significance of the site to future visitors. This Plan shall include the results of any historical and maritime archaeological investigations undertaken at the site and whether any remains are retained *in situ*. The Interpretation Plan should be prepared in accordance with the Guidelines issued by the Heritage Council of NSW. The Interpretation Plan should be prepared for the approval of the Department of Planning & Environment upon receipt of advice from the Heritage Division of the Office of Environment & Heritage.

Built Heritage

12. The proposed location of the new pedestrian bridge to connect Market Street to the podium and Pyrmont Bridge should be reviewed to avoid visual impacts to the Corn Exchange building and to the Shelbourne Hotel.

The Greater Western Sydney Region Team of the Office of Environment and Heritage may provide separate comment on Aboriginal cultural heritage.

If you have any questions regarding the above matter please contact Mariana Martin, Heritage Assessment Officer at the Heritage Division, Office of the Environment and Heritage by telephone on 02 9873 8527 or email at mariana.martin@environment.nsw.gov.au.

Yours sincerely



STEVEN MEREDITH
Regional Manager, South
Heritage Division
Office of Environment & Heritage
As Delegate of the Heritage Council of NSW
9 August 2018