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Your Ref: D/2016/1529, SSD 8111

Mr Bill Mackay
Manager – Planning Assessments
City of Sydney
456 Kent Street
SYDNEY NSW 2000

Attention: Chris Ashworth <CAshworth@cityofsydney.nsw.gov.au>

Dear Mr Mackay

RE: State Significant Development Application (SSD) seeking Stage 2 consent for a mixed use hotel at 1 Alfred Street, Sydney (SSD 8111).

I refer to your letter received on 30 November 2016 inviting comments on the above State Significant Development application at 1 Alfred Street, Sydney.

The previously approved Stage 1 concept SSD application (SSD 7101 and D/2015/1049) sought the demolition of Gold Fields House, Fairfax House and the Rugby Club buildings, and proposed building envelopes for two residential towers set above a retail podium building. An SSD modification (SSD 7101 and D/2015/1049/A) was subsequently approved to increase the height of Tower A by 9 metres to accommodate two additional floors and increased floor heights. In November 2016 a further modification was lodged (SSD 7101 and D/2015/1049/B) to adjust the building envelope of Tower B to reflect the geometry of the winning design.

The application involves the Stage 2 detailed design of the project. It largely proposes the same works as described in the Stage 1 concept design, however varies from the Stage 1 design in the following, minor ways:

- Refinement of the basement, ground plane, podium and tower elements in terms of detailed siting, design and materiality;
- A detailed landscape design for the ground plane of the Study Area; and
- Refinement of the demolition and construction management plans.

It is understood that a separate application has concurrently been lodged for demolition of the existing structures on the site. A subsequent application will be lodged for the detailed design of Tower A.

Built Heritage

The Heritage Council's previous comments noted the proposed redevelopment provides a substantial visual and physical separation from surrounding above ground State Heritage Register (SHR) listed items and would therefore not have adverse heritage impacts on those SHR items. The refinements proposed in this application do not represent a substantial departure from the approved Stage 1 SSD concept scheme, and would not result in any greater degree of impact to heritage items in the vicinity.

It is however noted the SHR curtilage of the Tank Stream extends beneath the subject site and that the development has the potential to physically impact on the viability of the structure. The 'Wanda Sydney: Tank Stream Report' prepared by Arup provides a design methodology to minimise potential disturbance to the Tank Stream. This involves retaining the eastern retaining walls of Gold Fields House and Fairfax House as part of the basement structure, and providing a

temporary retention system around the perimeter of the planned basements. The report concludes that despite excavation occurring within the three metre curtilage from all surfaces of the Tank Stream, the work would not result in any structural impact. Notwithstanding, the report recommends that works be suitably monitored to ensure that no structural impacts to the Tank Stream occur throughout the duration of works.

Interpretation

The Interpretation Strategy recommends interpretation in the ground plane public areas between Tower A and Tower B, in the forecourt areas fronting Alfred Street/ Herald Square, and in lobby and publicly accessible foyer areas to allow access to the widest possible audience. However, Interpretation has not been included in the detailed architectural and landscape plans prepared as part of this application. Further refinements to the current public domain and landscape plans and the Interpretation Strategy are therefore required to incorporate interpretative media and/or the on-site display or archaeological material, if discovered.

Archaeology

The Conditions of Consent for the Stage 2 SSD Development Application (DA) (Tower B) (D/205/1049) requires that:

A detailed historical archaeological assessment in the area of the subject site outside the footprint of Gold Fields House should be prepared. If the assessment confirms that relics are likely to be impacted, an archaeological research design and Section 140 Excavation Permit will be required prior to completion of the Stage 2 approval process.

A 'Historical Archaeological Assessment (HAA) and Research Design and Methodology' (RD&M), prepared by Urbis, dated 27 October 2016, was prepared to satisfy this condition.

The assessment of archaeological potential and degree of disturbance indicates that the Study Area was subject to an intensive degree of development from 1910 onwards. As such, archaeological potential is limited to below the current footprint of Fairfax House, the Rugby Club and Rugby Place. The extent of disturbance associated with the construction of Fairfax House is not well documented, however there is potential for lower levels of deposit to be present.

At Rugby Place particularly, the HAA considered that archaeological evidence within this area and relating to the phase of occupation from 1788-1860s, would have potential to be of State significance due to its potential to yield information about the colonisation and very early development of Sydney. The assessment concludes that whilst it is the preference to retain State significant relics *in situ*, this is not considered to be an appropriate option at the Study Area due to the approved building design. The Heritage Division considers that state significant relics should be kept in situ if the opportunity to amend the building design is possible.

The management strategy includes bulk excavation across the entirety of the Study Area to a depth of RL-18100. The HAA has indicated that the appropriate mitigation is an open area archaeological investigation and recording of the area of archaeological potential as well as the preparation of an appropriate interpretation strategy. The proposed mitigation measures include recovery of all significant artefacts and excavation records for long-term storage and/or incorporation into interpretative displays.

The HAA also notes that while the Tank Stream was not located within the Study Area it is located to the immediate east, with its three metre curtilage extending into the Study Area. The risk of ground vibration and ground settlements that may impact on the Tank Stream drainage structure will be mitigated prior to demolition works. This will be done by the construction of a temporary retention system around the perimeter of the planned basements. To further mitigate impacts on the Tank Stream, vibration monitoring is proposed throughout the construction work. Additionally, various vibration and surface monitoring procedures will be implemented during the proposed construction works.

The HAA has outlined that as the demolition and construction management plans for the redevelopment of the site are subject to Stage 2 DA approval, and may be subject to change following the DA submission. As a result the outlined excavation methodology may also be subject to change. It is noted that any changes to the proposed methodology will be discussed with the NSW Heritage Division prior to commencement of the archaeological program.

On this basis it is considered that the HAA is an appropriate document to guide the archaeology on the site. To ensure this, the following conditions are recommended:

- All excavation within the SHR curtilage of the Tank Stream must be undertaken in accordance with the methodology proposed in 'Wanda Sydney: Tank Stream Report' prepared by Arup, 30 September 2016. Works must be suitably monitored by a structural engineer to ensure that no structural impacts to the Tank Stream occur throughout the duration of works.
- The Interpretation Strategy should be updated to incorporate information from the archaeological excavation, and the archaeological resource and appropriate uses of any material from the archaeological excavation must be included in any subsequent Interpretation Plan.
- The Interpretation Plan must be prepared by an interpretive specialist in consultation with relevant designers, architects, landscape architects, engineers, archaeologists, historians, public art and other consultants and stakeholders, and include content development and detailed briefs and locations for specific interpretation media.
- The public domain and landscape plans should be further developed to incorporate the recommendations of the final Interpretation Plan and ensure effective integration into the overall design response to the site and public domain.
- The proposed Stage 2 DA works involving excavation within the Study Area must be undertaken in accordance with the excavation methodology outlined in 'Historical Archaeological Assessment and Research Design and Methodology', prepared by Urbis, dated 27 October 2016.
- The name of a suitably qualified and experienced excavation director who meets the Heritage Council Excavation Director criteria for salvage excavation for a site of this significance must be forwarded to the Heritage Division, Office of Environment & Heritage for endorsement before the archaeological program begins.
- Any future changes to the demolition or the building design which impact any heritage or archaeology on site should be referred to the Heritage Division for comment.

If you have any questions regarding the above advice, please feel free to contact Nina Pollock, Senior Heritage Assessment Officer, Heritage Division, Office of Environment and Heritage, at nina.pollock@environment.nsw.gov.au or 9873 8520.

Yours sincerely



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Heritage Division
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As Delegate of the NSW Heritage Council
31/01/2016