

Mr Brendon Roberts
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Department of Planning & Environment
23-33 Bridge Street
SYDNEY NSW 2000

Attention: Ms Michele Nettlefold

By email: michele.nettlefold@planning.nsw.gov.au

Dear Mr Roberts

Extension to Exhibition of Stage 1 Concept Proposal for the redevelopment of Harbourside Shopping Centre, Darling Harbour West, Sydney (SSD 7874)

Reference is made to your letter received on 16 December 2016 requesting comment and recommended consent conditions from the Heritage Council of NSW for the above proposal.

The proposed site includes and adjoins State Heritage Register item Pyrmont Bridge (SHR No. 1618). It is also over a section of early Sydney Harbour foreshore. That foreshore, as seen by archaeological investigations nearby at Barangaroo, had intensive harbour-side docking, wharves etc. It is likely that archaeological evidence (layout, footings and relics) of elaborate shipping-related activities remain on parts of the subject site under layers of later fill. Specific comments and recommended conditions of consent are provided below for maritime archaeology and historical archaeology.

Historical Archaeology

The Statement of Heritage Impact (SOHI) prepared by Curio Projects, predicts nil-low potential for archaeological remains of Phase 1 (1788-1874) to survive on site and ranks such remains as of local or State significance. The SOHI predicts moderate potential for 1844-78 occupation and commercial/industrial use archaeology to survive on site, including slipways, jetties, yards etc., noting that reclamation may have capped and thus preserved remains below ground. Such remains are ranked as of local significance. Phase 2 (1874-1960s) era remains of the Atlas Engineering works are predicted to have moderate archaeological potential to survive. Remains of reclamation works (fill, sea walls) in Phase 2 are predicted to be of high potential to survive. The Harbourside Shopping Centre, Darling Harbour Historical Archaeological Assessment (the HAA) prepared by Curio Projects, indicates that the Darling Harbour Goods Line and Goods Yard remains, including structural remains, manufacturing areas, slipways, rubbish pits and deeper subsurface features have a moderate potential to survive. The HAA indicates that should remains associated with the Darling Harbour Goods Line and Goods Yard be located, it would be unlikely that they would meet the threshold of local significance and considered relics. It is understood that whilst these remains may be classified as 'works' as they relate to rail infrastructure, such works may hold State heritage significance as the Darling Harbour Goods Line remains NSW's largest railway yard complex serving major industries at its principal port.

It is noted that the two proposed levels of basement subsurface car parking require excavation to 3.6m below existing ground surface is likely to entirely remove the surviving historical archaeological resource within the basement footprint. This is not considered best-practice given some may be of State significance.

The SOHI notes that the demolition of the existing Harbourside Shopping Centre and the construction of subsurface foundations for the proposed redevelopment would likely result in a range of large scale and localised impacts to the identified historical archaeological resource within the subject site. However, major excavation will be limited along the southern portion of the site to minimise disturbance or impact to the s.170 listed Water Cooling System and Manifold related to the former Pymont Power Station, with the exception for footings and other necessary services.

The SOHI notes that the statement of archaeological impact will continue to be refined and updated for Stage 2 development involving information relating to detailed geotechnical data, service plans and detailed design.

The following conditions of consent are recommended for historical archaeology:

1. 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 of the Office of Environment & Heritage for approval prior to commencement of works.
2. 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.
3. The Applicant must retain all state significant archaeological items *in situ* and minimise all impacts from the project to these state significant archaeological items.
4. All affected historical archaeological 'relics' and/or deposits of Local 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 Heritage Division of the Office of Environment & Heritage.
5. 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.
6. 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 Heritage Division of the Office of Environment & Heritage 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 this 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).
7. 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.
 8. 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. 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 Heritage Division of the Office of Environment & Heritage.

Maritime Archaeology

The potential richness of archaeological resources in waterfront areas such as in the present proposal has been proven with regard to the nearby Barangaroo SSD site. Given recent reports from the *Cockle Bay Marine Structures Renewal Project*, it is clear that this site has archaeological potential, including for State significant remains of pre-1844 shoreline zone use and 1844-1880s industrial/commercial and domestic uses of the site.

There are likely to be the remains of multiple layers of water-front occupation, both under reclamation and under water. Previous excavations in waterfront areas on this side of Darling Harbour (extending all the way north to Barangaroo) uncovered extensive and highly significant remains of maritime infrastructure and other historical sites. It is unclear from the report whether the current waterfront areas are piled or solid reclamation grounds.

There is potential for former seawalls, wharves, piers and jetties and also possible ship or boat wrecks (and associated relics) in these areas. There is a likelihood of State significant sites and relics being discovered in this area, and archaeological investigations to determine if archaeological remains of former structures still exist in this area should to be undertaken prior to any demolition/excavation works taking place.

It is noted under the Secretary General's Requirements (p.237) that the Statement of Heritage Impact *'identifies and addresses the impacts of the proposal on any archaeology protected under the NSW Heritage Act 1977'*. The Statement of Heritage Impact does not appear to have comprehensively assessed the potential for new archaeological sites or relics in the subject

site which are likely to be protected under the *Heritage Act 1977* (particularly if they are of State heritage significance).

Given that wharf and other maritime infrastructure sites were located within the proposed development footprint, any excavation should anticipate the possibility of maritime infrastructure sites and associated relics well below current reclamation surface levels and possibly as deep as the former seabed, the following consent conditions are recommended:

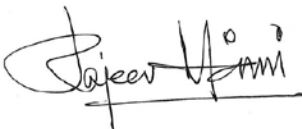
9. The *Statement of Heritage Impact, Aboriginal Heritage Due Diligence Assessment and Mitigation Measures* should be revised to include:

- a. Specific assessment of any potential remains of former bridges which may predate the Pyrmont Bridge structure or punt crossing sites (noting photographs of the original 1874 Pyrmont Bridge in Patricia Hale's Historical Assessment, p.10, Figure 8 and Curio Projects' Historical Archaeological Assessment, p.14, Figure 9).
- b. Specific assessment of any potential submerged Aboriginal sites or relics in current and formerly submerged sections of the site.
- c. Remote sensing and/or diver surveys of the seabed under any piled areas that currently form waterfront or paved areas of the proposed development.
- d. Procedures for the treatment of any newly-discovered archaeological sites prior to the commencement of any works at the site, specifically how they would be:
 - investigated;
 - recorded;
 - conserved (including long term conservation and storage of relics and archival lodgement of the results of recording and investigations);
 - interpreted (i.e., how any 'finds' will be securely stored on site, meaningfully displayed and/or integrated into site interpretive displays, works, signs, video or other electronic images, public art, public domain elements, events, etc.);
 - long term conservation of relics and archival lodgement of the results.
- e. Analysis of additional site information including geotechnical data, when available, and service plans should be undertaken to refine the understanding of the site's archaeological potential and level of significance;
- f. An archaeological research design should be prepared once proposed impacts on potential archaeological resources are finalised. This shall include a comparative analysis of similar archaeological sites in the vicinity.
- g. Any impacts to archaeological relics of local or State significance associated with the development should be managed in accordance with current NSW Heritage Division guidelines, to ensure best practice is adhered to.
- h. Demolition works and any proposed excavation works should be monitored by a suitably qualified and experienced maritime archaeologist.
- i. All these works should be undertaken 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.
- j. An unexpected finds protocol should be prepared for the site, giving clear indications of what will be done if unexpected finds are discovered during demolition and construction and how they will be recorded and or excavated, the conservation techniques to be employed and if *in situ* preservation and interpretation can be undertaken.
- k. Should unexpected finds such as Aboriginal stone artefacts or shell middens be located during development, work should cease in the immediate vicinity of the find and the project archaeologist must be notified, in accordance with the unexpected finds protocol.

- I. Specific assessment of the visual impact of the proposed works on the identified heritage values of SHR-listed sites (e.g., the SHR listed Pyrmont Bridge) and the removal of the SS *South Steyne* from the area. If there is no visual impact on these items, this should be specifically stated.
10. 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.
11. 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.
12. 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).

If you have any questions regarding the above matter, please contact Stuart Read, Assessment Officer at the Heritage Division, Office of Environment and Heritage on telephone (02) 9873 8554 or by email: stuart.read@environment.nsw.gov.au.

Yours sincerely



Rajeev Maini
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Heritage Division
Office of Environment & Heritage
As Delegate of the Heritage Council of NSW
14 February 2016