



Our File: EF14/5520
Our ref: DOC20/262983

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 Submissions for Harbourside Shopping Centre Redevelopment SSD 7874

Thank you for your referral dated 1 April 2020 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal.

The RTS was supported by two main documents which discuss heritage impacts including:

- *Response to Submission: Heritage Impact Statement: Harbourside Redevelopment*, prepared by Curio Projects dated 12 February 2020;
- *Response to Submissions and Amended Concept Proposal redevelopment of Harbour Shopping Centre Darling Harbour*, prepared by Ethos Urban dated 24 March 2020

Heritage NSW notes that the 2020 HIS prepared by Curio has responded to Heritage Council comments supplied on 14 February 2016 at the EIS stage.

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

- An amended location for the proposed tower from the north of the site to its centre to increase the set back from the SHR listed Pyrmont Bridge. The Tower will be reduced in height from 166.35RL to 153.75RL.
- The Tower podium at its northern extent will be reduced from 30.5RL to 25RL. There will be an increased building footprint to accommodate these changes. Removal of the pedestrian bridge link across Darling Drive, obsolete Monorail infrastructure and associated tree removal.
- Adjustment to the public domain concept proposal with a network of open space areas and links to re-integrate the site into the wider urban context;
- Three levels of car parking are now proposed (not two).

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 amended proposal will reduce the visual and physical impacts to the Pyrmont Bridge and Heritage NSW (HNSW) supports the amended approach. HNSW also notes that since 2016, the SS South Steyne has since been removed from Darling Harbour and no visual impact will result from the current development at this stage.

This site, as with other parts of the former foreshore of Darling Harbour has archaeological potential for intensive harbour use. This includes for State significant remains of pre-1844 shoreline zone use and 1844-1880s industrial/commercial and domestic uses of the site, remains which may survive under reclamation works and underwater. 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.

Evidence of this nature has previously been identified on both sides of Darling Harbour, including surviving original foreshore which was again revealed in 2018 by the Sydney Metro project at Barangaroo. To resolve this, additional assessment is recommended now as conditions of the concept approval.

HNSW notes that the Sydney Metro discovery has implications for the subject site's archaeological potential and the proposed redevelopment, where new basements and associated excavation are proposed without adequate maritime and revised historical archaeological assessment. The RtS submission argues these elements will be 'managed' at the Stage 2 phase when the detailed design of the project will be known.

Where the RTS has not re-assessed the archaeological potential and its heritage values for the concept approval, it has also not considered how the project would manage the presence/discovery of State significant archaeological fabric (above and below water). This will likely include early seawalls. HNSW recommends that there is a 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.

As comment for this project, Heritage NSW recommends the DPIE should require the Proponent to undertake archaeological early physical archaeological investigation (through testing) to inform the Stage 2 detailed design for the project and its approval. This could be undertaken following concept approval or to inform the EIS assessment documents. This would also clarify the Aboriginal archaeological potential. The results of this investigation should be used to guide the final design of the project and best manage significant finds during the project.

HNSW recommends the above comments and conditions for consideration by DPIE in determining this SSD Concept Proposal:

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, 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 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, who has an 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.

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.

Yours sincerely



29 February 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