

Mr Thomas Watt  
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## **Draft Pyrmont Peninsula Sub-Precinct Master Plans**

Dear Mr Watt

Thank you for the opportunity to provide advice on the draft Master Plans for seven Sub-Precincts under the Pyrmont Peninsula Place Strategy (Place Strategy), which will provide high level guidance on how the Sub-Precincts could be developed over the next twenty years. We apologise for the lateness of this submission.

We note that Heritage NSW made two submissions on the Place Strategy in September 2020, one on Aboriginal Cultural Heritage (Attachment 1), the other on non-Aboriginal heritage (Attachment 2). In August 2021, we also provided advice on the Blackwattle Bay State Significant Precinct (Attachment 3).

We have reviewed the draft Master Plans and supporting studies, including the draft planning controls for two of the key sites – The Star and the University of Technology Sydney (UTS), and provide general advice on the main objectives and future character of the peninsula, as it relates to State Heritage Register (SHR) items in the seven Sub-Precincts.

As ‘Pyrmont and Glebe Railway Tunnels’ (SHR 01225) and ‘Pyrmont Bridge’ (SHR 01618) fall across several precincts they have been addressed under their own separate headings below.

### **SHR Listed ‘Pyrmont and Glebe Railway Tunnels’**

The SHR listed ‘Pyrmont and Glebe Railway Tunnels’ traverse five of the seven Sub-Precincts of the Pyrmont Peninsula.

Due to their geographic spread across the peninsula and their significance to the heritage of the area, care should be taken to avoid impacts to the tunnels as they retain a high degree of structural integrity and are important relics of the inner-city freight system.

Any future works in the vicinity of the structures should be accompanied by a heritage impact statement, outlining protective measures to ensure that historic fabric is not damaged or removed.

### **SHR Listed ‘Pyrmont Bridge’**

The draft Master Plan includes the expansion of the pedestrian plaza between Pyrmont and the Sydney CBD across Pyrmont Bridge. It also suggests the rerouting of Darling Drive under Pyrmont Bridge to Murray Street, and reallocation of road space to increase public open space at the western edge of Pyrmont Bridge.

While we support plans to improve the pedestrian experience, particularly at this critical gateway to the Pymont Peninsula, we recommend that care is taken to avoid impact to the historic fabric and structural integrity of Pymont Bridge.

The Master Plan for The Star proposes a 6-star hotel to be developed at the northern end of the existing casino site – the ‘North Tower’, with a proposed maximum height of RL110 (105 metres). A second tower is proposed at 37-69 Union Street – the ‘Union Street Tower’. This second tower will also be the site of ‘Metro Site East’ – one of two proposed entries to the Pymont Metro Station.

This proposed tower at Union Street will be highly visible from the SHR listed ‘Pymont Bridge’. We recommend that development proposals analyse significant public views, many of which have been identified in the Urban Design Report and supported by a Visual Impact Assessment. Particular attention is drawn to the views along Union Street in both directions to Pymont Bridge and Union Square.

### **Pymont Village Sub-Precinct**

Pymont Village is the heart of the wider peninsula and plays a critical role in the cohesion of the surrounding neighbourhoods. Maybanke Park and Elizabeth Healy Reserve are identified as special character areas with the potential for urban renewal, expanded pedestrian plaza and connectivity to the future metro station.

SHR listed items in Pymont Village include:

- ‘Pymont Post Office’ (SHR 01440), also identified as a Commonwealth Heritage Place, and
- part of ‘Pymont and Glebe Railway Tunnels’.

‘Metro Site West’, one of two proposed entries to the Pymont Metro Station, is in the Pymont Village Sub-Precinct. It will include a station building, but no additional development. A maximum height limit of RL 37.75 (22 metres) is proposed.

Future development proposals should be carefully formulated to avoid impacts on significant views and setting of the SHR item. We recommend that new buildings in the precinct respond to the existing scale and character of heritage items in the vicinity.

### **Pirrama Sub-Precinct**

This industrial headland precinct includes a range of mid to high rise development, with an active foreshore connected by parks and promenades.

The Pirrama Sub-Precinct includes the following SHR listed items:

- ‘Old Pymont Cottages’ (SHR 01986)
- part of ‘Pymont and Glebe Railway Tunnels’, and
- part of ‘Glebe Island Bridge’ (SHR 01914).

Two main character areas are identified in the draft Master Plan - these include Bowman Street and John Street Square. The draft Master Plan proposes the expansion of John Street Square, along Harris Street, to improve pedestrian access throughout the Sub-Precinct.

The proposed expansion areas are close to the SHR listed cottages, as such care should be taken to avoid impacts, both physical and visual, to these cottages.

The draft Master Plan identified opportunities for repurposing the Glebe Island Bridge to link the Pymont Peninsula with Bays West. The bridge holds historical significance at a State level for being one of only two swing-span bridges in Australia, with associations to the reputable bridge designer, Percy Allan. The Heritage Council of NSW has actively supported conversations with Government about the retention, conservation, and adaptive reuse of this significant asset which is rare nationally. Any proposal to ‘repurpose’ the bridge should avoid adverse impacts on the identified SHR listed values of the item and involve the close engagement of the Heritage Council and Heritage NSW.

While we support the vision for improved connectivity between Bays West and the peninsula, care should be taken to protect the historic fabric and structural integrity of the bridge, and views from it and to it. Future investigations should explore various concept designs to ensure the best possible heritage outcome, and urgent attention to its current structural condition, including all in-water components.

### **Darling Island Sub-Precinct**

The Darling Island Sub-Precinct includes two special character areas, being Pyrmont Bay Park and Union Street. The draft Master Plan highlights opportunities to create better waterfront connection by upgrading existing footpaths, enhancing green spaces, upgrades to wharf and ferry terminals, as well as the creation of a civic spine along Union Street with access to the future metro station.

The Darling Island Sub-Precinct includes the following SHR listed items:

- 'Royal Edward Victualling Yard' (REVY) (SHR 01855)
- part of 'Pyrmont Bridge', and
- part of 'Pyrmont and Glebe Railway Tunnels'.

### **Tumbalong Park Sub-Precinct**

Tumbalong Park is a harbourside precinct used primarily for events and recreational purposes. It includes several heritage items with links to Sydney's maritime history.

The Tumbalong Park Sub-Precinct includes the following SHR listed items:

- 'Darling Harbour Woodward Water Feature' (SHR 01933)
- 'The Carousel' (SHR 01620), and
- part of 'Pyrmont Bridge'.

State heritage listed items like Bridge and 'The Carousel' are important visual landmarks in the precinct. Future development proposals for the area should not encroach upon these items nor obstruct significant views. Future development should retain the significant view corridors identified in the Urban Design Report.

### **Wentworth Park Sub-Precinct**

Wentworth Park is a parkside community characterised by historic warehouses and terraces.

The Wentworth Park Sub-Precinct includes the following SHR listed items:

- 'Sewage Pumping Station 1' (SHR 01336)
- 'Glebe Railway Viaduct' (SHR 01034), and
- part of 'Pyrmont and Glebe Railway Tunnels'.

Jones Street has been identified as a special character area and a key peninsula connector that spans both the northern and southern end of the Pyrmont Peninsula. We support the activation of this area through new public amenities, play spaces and art installations. The proposed adaptive reuse of local heritage items such as the Old Wool Stores would benefit the community and enhance the prominence of these heritage items.

The draft Master Plans for the Sub-Precinct are a substantial distance to the east of the Glebe Railway Viaduct, as such we do not consider that they will have an impact on this SHR item.

### **Ultimo Sub-Precinct**

Located at the edge of Central Station, the Ultimo Sub-Precinct is a centre for creativity and learning. Three special character areas have been identified through the Master Planning process. These include the Powerhouse, Goods Line North and Goods Line South.

The Ultimo Sub-Precinct includes the following SHR listed items:

- 'Ultimo Post Office' (SHR 00502)
- 'Ultimo Road Railway Underbridge' (SHR 01062), and
- 'Ultimo Power House' (Powerhouse Museum) (SHR 02045).

UTS is identified as one of the four key sites in the peninsula. It went through a separate Master Planning process involving multiple sessions with the State Design Review Panel. Heritage NSW supports the proposal for a 250-bed Indigenous Residential College on Harris Street in Ultimo. A height limit of RL68 (65 metres) is proposed for this development. There are no SHR listed items close to the site.

### **Blackwattle Bay Sub-Precinct**

This Sub-Precinct includes three special character areas, Carmichael Park, Bank Street and Pyrmont Bridge Road.

The Blackwattle Bay Sub-Precinct includes the following SHR listed items:

- part of the 'Pyrmont and Glebe Railway Tunnels'.

As we have provided advice on this Sub-Precinct in relation to the State Significant Precinct proposal (at Attachment 3), we draw the Department's attention to the advice provided in that response.

### **Aboriginal Cultural Heritage**

In our previous Aboriginal Cultural Heritage advice on the Place Strategy (see Attachment 1), we noted several recommendations, including that a full Aboriginal Cultural Heritage Assessment Report (ACHAR) be prepared in accordance with Heritage NSW guidelines to identify Aboriginal cultural heritage values that exist across the Peninsula, and that consultation with Aboriginal people must be undertaken and documented. It appears that some of these recommendations still need to be actioned.

Our previous Aboriginal Cultural Heritage advice on the Place Strategy is provided below at Attachment 1.

### **Heritage Impact**

We recommend that future development proposals near to SHR items should be informed by a Statement of Heritage Impact (SOHI), prepared in accordance with Heritage NSW guidelines:

- Statements of Heritage Impact – <https://heritage.nsw.gov.au/assets/Uploads/a-z-publications/s-u/Statements-of-Heritage-Impact.pdf>

The SOHI should address the impacts of such proposals on the heritage significance of the SHR items and include the following:

- Identification of all heritage items (state and local) within and in the vicinity of the development site including built heritage, landscapes and archaeology, their detailed mapping, and assessment why the items are of heritage significance;
- compliance with relevant Conservation Management Plans;
- the potential impacts of the proposal on heritage items including visual impacts such as impact on views and setting;
- proposed measures to mitigate the impact on the heritage significance or cultural heritage values of the items; and
- justification for any proposed changes to the heritage fabric or landscape elements and why more sympathetic solutions are not viable, including any options analysis.

## Historical Archaeology

Given the rich and diverse history of the area, there is potential for archaeological resources in many parts of the Pyrmont Peninsula. Any development which may involve excavation may require an Historical Archaeological Assessment under the *Heritage Act 1977*.

If required, a Historical Archaeological Assessment should be also prepared to inform the Research Framework and Archaeological Management Plan identified in the Heritage Study. This should be prepared by a suitably qualified historical archaeologist in accordance with Heritage NSW guidelines:

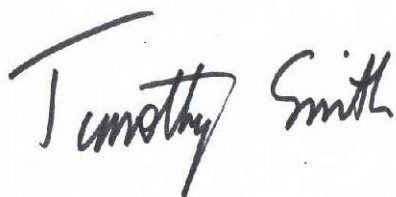
- Archaeological Assessments (1996) – [heritage.nsw.gov.au/assets/Uploads/files/archaeological-assessments-guidelines.pdf](https://heritage.nsw.gov.au/assets/Uploads/files/archaeological-assessments-guidelines.pdf)
- Assessing Significance for Historical Archaeological Sites and Relics (2009) – [heritage.nsw.gov.au/assets/Uploads/a-z-publications/a-c/Assessing-Significance-A-Historical-Archaeological-Sites-and-Relics.pdf](https://heritage.nsw.gov.au/assets/Uploads/a-z-publications/a-c/Assessing-Significance-A-Historical-Archaeological-Sites-and-Relics.pdf)

## Heritage Interpretation

Opportunities for interpretation of the heritage buildings and structures associated with the working harbour history should be explored as part of future development proposals.

If you have any questions on this matter please contact Stela Razzaque, Senior Planning Officer, Heritage Assessments at Heritage NSW by email at [stela.razzaque@environment.nsw.gov.au](mailto:stela.razzaque@environment.nsw.gov.au) or by phone on 02 8229 2905.

Yours sincerely

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style with a large, sweeping initial 'T'.

**Tim Smith OAM**  
**Director, Heritage Assessments**  
**Heritage NSW**

As delegate of the Heritage Council of NSW and for Heritage NSW

1 April 2022



Our ref: DOC20/695702-3

Mr Lee Mulvey  
Project Director, Pyrmont Peninsula Place Strategy  
Place, Design and Public Space  
Department of Planning, Industry and Environment  
[lee.mulvey@planning.nsw.gov.au](mailto:lee.mulvey@planning.nsw.gov.au)

## Pyrmont Peninsula Place Strategy

Dear Mr Mulvey

Thank you for the opportunity to comment on the draft *Pyrmont Peninsula Place Strategy* (draft Strategy).

We have reviewed the draft Strategy and *Indigenous Cultural Heritage Report* and provide the following comments in relation to Aboriginal cultural heritage matters.

### Aboriginal Cultural Heritage

The *Indigenous Cultural Heritage Report* dated July 2020, and prepared by Kelleher Nightingale Consulting Pty Ltd, provides a good basis to inform the Strategy on how best to incorporate Aboriginal cultural heritage values into future planning for the Peninsula. We support the findings of the report while also noting that further detailed Aboriginal cultural heritage assessment will be required for any future development proposed.

### Next steps for Aboriginal Cultural Heritage Assessment

We support the key recommendations and next steps outlined on page 45 of the *Indigenous Cultural Heritage Report* including:

- The need to prepare a full Aboriginal Cultural Heritage Assessment Report (ACHAR) to identify and describe the Aboriginal cultural heritage values that exist across the Peninsula. This may include the need for surface survey and test excavation. The identification of cultural heritage values needs to be conducted in accordance with the [Code of Practice for Archaeological Investigation in NSW](#) (OEH 2010), and be guided by the [Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales](#) (DECCW 2011) and consultation with Aboriginal Cultural Heritage Regulation staff of Heritage NSW.
- Consultation with Aboriginal people must be undertaken and documented in accordance with the [Aboriginal Cultural Heritage Consultation Requirements for Proponents](#) (DECCW 2010). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land needs to be documented in the ACHAR.
- Any impacts on Aboriginal cultural heritage values need to be assessed and documented in the ACHAR. The ACHAR needs to demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the ACHAR must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must also be documented and notified to Heritage NSW.

- The development of an Aboriginal Heritage Interpretation Strategy to acknowledge and celebrate the Peninsula's Aboriginal cultural heritage values.

If you have any questions, please do not hesitate to contact me by phone on 02 6229 7089 or via email at [jackie.taylor@environment.nsw.gov.au](mailto:jackie.taylor@environment.nsw.gov.au).

Yours sincerely



**Jackie Taylor**  
**Senior Team Leader, Aboriginal Heritage Regulation – South**  
**Heritage NSW**

14 September 2020



Our ref: DOC20/681416

Mr Lee Mulvey  
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Place, Design and Public Space  
Department of Planning, Industry and Environment  
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### **Draft Pyrmont Peninsula Place Strategy**

Dear Mr Mulvey

Thank you for the opportunity to provide comment on the draft Pyrmont Peninsula Place Strategy (draft Strategy) prepared by the Department of Planning, Industry and Environment (the Department).

We have reviewed the draft Strategy and the supporting Non-Indigenous Cultural Heritage Study (Heritage Study) prepared by GML Heritage and provide the following advice for your consideration.

#### **State Heritage**

As well as 141 Local heritage items, three Heritage Conservation Areas and 15 s170 Register items, our records show that the Pyrmont Peninsula also contains the following items identified on the State Heritage Register (SHR):

- the Commonwealth Heritage Place and State Heritage Register item 'Pyrmont Post Office' (SHR 01440), and
- a further 13 State Heritage Register items:
  - 'Old Pyrmont Cottages' (SHR 01986)
  - 'Royal Edward Victualling Yard' (SHR 01855)
  - 'Darling Harbour Woodward Water Feature' (SHR 01933)
  - 'South Steyne (S.S)' (SHR 00755)
  - 'The Carousel' (SHR 01620)
  - 'Sewage Pumping Station 1' (SHR 01336)
  - 'Ultimo Post Office' (SHR 00502)
  - 'Ultimo Road Railway Underbridge' (SHR 01062)
  - 'Glebe and Wentworth Park Railway Viaducts' (SHR 01034)
  - part of 'Pyrmont and Glebe Railway Tunnels' (SHR 01225)
  - part of 'Pyrmont Bridge' (SHR 01618), and
  - part of 'Glebe Island Bridge' (SHR 01914), and
  - the recently listed 'Ultimo Power House' (Powerhouse Museum) (SHR 02045).

It is noted that the Heritage Study identified only ten SHR items, as opposed to the 14 identified above. The Heritage Study and draft Strategy should be updated to reflect this information.

Care must be taken to avoid impacts on the SHR items identified above, and consideration needs to be given as to how to mitigate any impacts where they are unavoidable. Heritage NSW can provide specific information and more detailed advice on the State Heritage Register items if required.



## Historical Archaeology

A Historical Archaeological Assessment should be also prepared to inform the Research Framework and Archaeological Management Plan identified in the Heritage Study. This should be prepared by a suitably qualified historical archaeologist in accordance with Heritage NSW guidelines:

- Archaeological Assessments (1996) – [heritage.nsw.gov.au/assets/Uploads/files/archaeological-assessments-guidelines.pdf](https://heritage.nsw.gov.au/assets/Uploads/files/archaeological-assessments-guidelines.pdf)
- Assessing Significance for Historical Archaeological Sites and Relics (2009) – [heritage.nsw.gov.au/assets/Uploads/a-z-publications/a-c/Assessing-Significance-A-Historical-Archaeological-Sites-and-Relics.pdf](https://heritage.nsw.gov.au/assets/Uploads/a-z-publications/a-c/Assessing-Significance-A-Historical-Archaeological-Sites-and-Relics.pdf)

## Heritage Initiatives

Heritage NSW supports many of the heritage initiatives and actions which the Department has identified in the draft Strategy, including:

- an interpretive connection between Pyrmont and Glebe Island Bridges
- enhancement, adaptive reuse and improved access to heritage buildings, and reinstating views to and from the harbour and to protected heritage items
- encouraging the acknowledgement and celebration of Aboriginal heritage and culture and the working harbour history in new development and across the Peninsula
- making better use of the land beneath the Western Distributor for a range of uses, including showcasing art, history and heritage
- preserving the heritage character and form of Pyrmont Village and sensitively adapting heritage buildings, and rejuvenating Harris Street as the heritage spine of the precinct, and
- installation of heritage interpretive elements.

## Heritage Guidance

Heritage NSW has several publications which may be of assistance in addressing the heritage objectives of the draft Strategy. These publications are available online at [heritage.nsw.gov.au/search-for-heritage/publications-and-resources/](https://heritage.nsw.gov.au/search-for-heritage/publications-and-resources/).

## Aboriginal Cultural Heritage

Heritage NSW's Aboriginal Cultural Heritage Regulation team will provide separate advice in relation to Aboriginal heritage considerations under the *National Parks and Wildlife Act 1974*.

If you have any questions regarding this matter please contact James Sellwood, Senior Heritage Programs Officer, Heritage Programs at Heritage NSW, Department of Premier and Cabinet by phone on 02 9274 6354 or via email at [james.sellwood@environment.nsw.gov.au](mailto:james.sellwood@environment.nsw.gov.au).

Yours sincerely



**Rochelle Johnston**  
**Manager, Heritage Programs**  
**Heritage NSW**

As delegate of the Heritage Council of NSW  
14 September 2020



Our ref: DOC21/551185

Mr David McNamara  
Director, City of Sydney, Eastern Harbour City  
Greater Sydney, Place and Infrastructure  
Department of Planning, Industry and Environment  
[eastern.harbourcity@planning.nsw.gov.au](mailto:eastern.harbourcity@planning.nsw.gov.au)

Attention: Ms Palitja Woodruff,  
[palitja.woodruff@planning.nsw.gov.au](mailto:palitja.woodruff@planning.nsw.gov.au)

### **State Significant Precinct – Blackwattle Bay**

Dear Mr McNamara

Thank you for the opportunity to comment on the Blackwattle Bay State Significant Precinct Study (the Precinct Study) prepared by Infrastructure NSW.

Heritage NSW (as part of the former Office of Environment and Heritage) provided both Aboriginal cultural heritage and non-Aboriginal heritage study requirements for what was then known as the Bays Market District in 2017, including:

- a heritage assessment that investigates the history, physical evidence and significance of features within the study area, to identify and conserve local or greater heritage features
- a Maritime Archaeological and Heritage Assessment (desktop and possible underwater survey) that assesses the significance of buried or submerged maritime heritage sites
- an Aboriginal cultural heritage study to identify and describe Aboriginal cultural heritage values across the whole area that will be affected by the development and document these in the study, and that consultation with Aboriginal people must be undertaken and documented, and
- provide an interpretation plan having particular regard to the precinct's relationship with nearby heritage items in accordance with *Interpreting Heritage Places and Items Guidelines*.

We note that the above requested studies and other associated studies have been prepared in support of the Precinct Study. We have reviewed these documents and make the following comments:

#### **Aboriginal cultural heritage considerations under the *National Parks and Wildlife Act 1974***

We have reviewed the Heritage Interpretation Strategy as well as the following Aboriginal cultural heritage documents prepared to inform the Precinct Study:

- Aboriginal Cultural Heritage Assessment Report
- Connecting with Country Framework for Tjerruing Blackwattle Bay, and
- Aboriginal Cultural Advice and Community Engagement Findings Report.

We consider that the overall approach identified in these documents is acceptable, and if followed will have a positive Aboriginal cultural heritage outcome. We provide the following comments in relation to Aboriginal cultural heritage considerations under the *National Parks and Wildlife Act 1974*:

- the upfront acknowledgement, preliminary statement of intent and integration of Aboriginal cultural heritage considerations throughout the supporting studies represent a strong holistic approach and which should be continued in future stages of planning and delivery
- if realised, the Aboriginal cultural heritage initiatives identified in the Heritage Interpretation Strategy will have strong and positive heritage, cultural and community outcomes
- the Aboriginal Cultural Heritage Assessment Report provided appears to be compliant with the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*
- the identified early and ongoing respectful consultation and engagement with Aboriginal stakeholders, is positive and should continue
- we note the constraints on visibility and access within the study area detailed in the limited on-site survey. We also note the lack of archaeological investigations previously undertaken within the study area and the immediate surrounds, and
- future development should consider minimal disturbance activities for those areas identified as having moderate Aboriginal archaeological potential. If this is not possible then further investigation and consultation with Aboriginal stakeholders would be required.

### **State and local heritage considerations under the *Heritage Act 1977***

#### **As delegate of the Heritage Council**

We have reviewed the following heritage documents prepared to inform the Precinct Study:

- European Heritage Assessment and Impact Statement, and
- Heritage Interpretation Strategy/Plan.

We provide the following comments in relation to State and local non-Aboriginal heritage matters under the *Heritage Act 1977*:

- there are no items of State heritage significance within the study area, however there is a local heritage item 'Escarpment face from former quarry "Saunders' Quarry"', listed as item I1199 under *Sydney Local Environmental Plan 2012* (LEP)
- the Assessment and Impact Statement identified that the 'Wharf-front warehouse' at 1-3 Bank Street, Pyrmont had potential heritage significance, and should be considered for adaptive reuse, but did not indicate the level of significance of this potential item. Further assessment should be undertaken to determine the significance of the building and inform potential listing and management measures
- the Interpretation Strategy/Plan identified several initiatives which are considered to have a positive heritage outcome, including:
  - an archive of material associated with Sydney Fish Market, former coal loader, office/weighbridge building and the subject site in general
  - ensuring salvaged materials and elements of the former coal loader are incorporated into the public domain and art works within the promenade landscape in a meaningful and interactive manner in consultation with the heritage consultant, and
  - interpretive media panels to be prepared in consultation with a heritage specialist.

### **Archaeological considerations under the *Heritage Act 1977***

#### **As delegate of the Heritage Council**

We have reviewed the Maritime Archaeological Assessment and consider that the assessment represents a measured investigation of the maritime archaeological potential of Blackwattle Bay. We note the following advice in relation to archaeological considerations under the *Heritage Act 1977*:

- the likely presence/absence of archaeological sites and relics in Blackwattle Bay appears to have been adequately assessed
- key areas of archaeological sensitivity have been identified, particularly around the western, eastern and southern portions of the Bay close to the foreshore and under adjacent landfill

- clarification is needed of the use of the term 'jetty' within the document, as:
  - the colloquial local term 'jetty' implies a piled timber or concrete structure, whereas the official term 'jetty' means a solid structure through which water cannot flow (i.e. stone or concrete structure), and
  - this has implications for the types of expected archaeological structural components, likelihood of preservation, and possible locations of relics on these sites (i.e. jetties would not normally have associated relics deposits under the structural components of the jetty itself but on top of it)
- we note that the presence of slimline features on a map do not necessarily only indicate a 'lightweight' structure (i.e. timber piers), they could also indicate narrow stone jetties which were quite robust in nature
- we also note that there is potential that the swampy area in the southern regions of the now reclaimed sections of Blackwattle Bay were once used for local boatbuilding/repairs and maintenance for very shallow drafted craft
- overall, we consider that the recommendations of the Maritime Archaeological Assessment are adequate and acceptable.

We have also reviewed the European Heritage Assessment and Impact Statement and the Heritage Interpretation Strategy/Plan in relation to historical archaeology, and note the following:

- the European Heritage Assessment and Impact Statement has identified that there is potential for archaeological resources associated with 'early industrial activities' along the foreshore near the former Sydney Fish Market site. However, the document has not assessed the significance of these remains, and it is unclear if they meet the threshold to be considered 'relics' requiring management under the *Heritage Act 1977*.
- We recommend that an historical archaeological assessment is prepared to establish the potential and significance of these remains and appropriate management measures. This should be undertaken to inform final designs prior to the commencement of development in the precinct. This will avoid significant time and cost delays.

If you have any questions please contact James Sellwood, Senior Heritage Programs Officer, Strategic Relationships and Planning at Heritage NSW by phone on 02 9274 6354 or by email at [james.sellwood@environment.nsw.gov.au](mailto:james.sellwood@environment.nsw.gov.au).

Yours sincerely



**Rochelle Johnston**  
**Manager, Heritage Act Programs**  
**Heritage NSW**  
**As delegate of the Heritage Council of NSW**  
**and**  
**For Heritage NSW**

27 August 2021