



Heritage Council

of New South Wales

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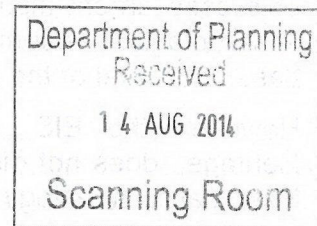
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File No: EF14/24121
Job ID: DOC14/127429
Your Ref: SSD 6371

Ms Amy Watson
Team Leader – Key Sites & Social Projects
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2014

ATTN: SIMON TRUONG



Dear Ms Watson

RE: Heritage Council comments on Environmental Impact Statement for Mixed Use Development for Student Accommodation and a Residential Flat Building, 175-177 Cleveland Street, Redfern (SSD 6371).

I refer to your letter of the 7th of July, 2014, requesting any comments that the Heritage Council may have on the above proposal including advice on recommended conditions of consent.

It is noted that the Proponent forwarded hard copies of the above Environmental Impact Statement (EIS) by Sutherland & Associates Planning to the Heritage Council under separate cover.

The Heritage Council notes that it has previously provided comment regarding appropriate Director General's Requirements (DGRs) for this project in February 2014.

The issued DGRs for this project in regards to heritage states that the EIS should:

- Assess the heritage significance of the site and any impacts the development may have upon this significance.
- Non-Aboriginal heritage items within the areas affected by the proposal should be identified. A statement of significance and an assessment of the impact of the proposal on the heritage significance of these items should be undertaken. Any policies/measures to conserve their heritage significance should be identified. This assessment should be undertaken in accordance with the guidelines in the NSW Heritage Manual.
- This proposal should identify whether the site has any significance to Aboriginal cultural heritage and archaeology and identify appropriate measures to preserve that significance. The proposal should have regard to any impacts on places, items or relics of significance to Aboriginal People. Where it is likely the project will impact on the Aboriginal heritage, adequate community consultation should take place regarding the assessment of significance, likely impacts and management/mitigation measures.

Accordingly, after a review of the EIS and its relevant Appendix (Appendix U 'Archaeological Report' by AHMS) the following is noted:

1. Appendix U (a Baseline Historical Archaeological Assessment by AHMS) identifies a significant potential historical archaeological resource present at the subject site relating to the former Royal Standard Hotel and other unidentified buildings present on site from the 1880s.

These archaeological remains may consist of the cellar of the Hotel, structural features, cess pits, yard deposits and refuse pits (page 33-34). The potential archaeological features have been identified as having local significance (page 35).

This assessment also states that the proposed works would impact any potential archaeological resources at the site due to the excavation required for the basement level of the proposed development.

2. However, the EIS, specifically within Section 9.7 'European and Aboriginal Heritage', does not discuss or outline the results of the AHMS report in relation to historical archaeology.
3. No mitigation strategies are presented in the EIS to ensure that this archaeology is appropriately archaeologically excavated and recorded as part of the development works.
4. Based on the above, the Heritage Council concludes that the EIS does not meet the DGRs for the project, specifically DGR number 2 in relation to European and Aboriginal Heritage.

The DGR requires that the policies/measures to conserve the heritage significance of identified heritage items should be identified. This has not taken place.

- The Heritage Council recommends that because the main EIS report does not contain any information on the historical archaeological resources present at the site, it should be amended and readvertised. This is to allow the public the opportunity to comment on all the impacts the project may have on the heritage of Redfern, with all of the information contained in the one report.

5. In addition, Appendix U consists of a Baseline Archaeological Assessment which is not in accordance with Heritage Council Guidelines (this is stated on page 7 ...*'the report does not conform to the... Heritage NSW Heritage Manual in full'*).

As such, the Baseline Archaeological Assessment does not confirm with DGR No. 2 which requires that the assessment should be undertaken in accordance with the guidelines in the NSW Heritage Manual.

- The Heritage Council recommends that as part of the amendment process for the EIS, a full Archaeological Assessment is undertaken for the site which includes mitigation measures in the form of an archaeological programme to ensure that any archaeology is appropriately managed prior to its destruction as part of the development works.

6. However, should the Proponent and the Department of Planning and Environment choose not to amend the EIS and not readvertise it, the Heritage Council requests the following Standard Archaeological Conditions (conditions 1-14 below) be included in the Project approval to ensure that the destruction of the archaeological resource at the site is managed and mitigated.

Heritage Council Historical Archaeological Conditions for SSD 6371:

01. The Proponent must ensure that a full historical archaeological assessment which contains mitigation measures in the form of an archaeological programme is undertaken by a suitably qualified and experienced historical archaeologist prior to any demolition works commencing on site.
02. The historical archaeological mitigation program must be undertaken by a suitably qualified and experienced historical archaeologist who meets the Heritage Council's Excavation Director Criteria for salvage excavation of locally significant sites after demolition but prior to site excavation.
03. The details of the nominated excavation director must be forwarded to the Heritage Council (or its Delegate) for approval prior to commencement of any archaeological programme on site.
04. The Applicant must ensure that the approved Excavation Director is present at the site supervising all archaeological fieldwork activity likely to expose significant relics.
05. The Applicant must ensure that the approved Excavation Director takes adequate steps to record in detail relics, structures and features discovered on the site during the archaeological works in accordance with current best practice. This work must be undertaken in accordance with relevant Heritage Council guidelines.
06. The Applicant must ensure that the nominated Excavation Director briefs all personnel involved in the project about the requirements of the NSW 'Heritage Act 1977' in relation to the proposed archaeological program. This briefing should be undertaken prior to the commencement of on-site excavation works.
07. The Applicant must ensure that the nominated Excavation Director and the excavation team is given adequate resources to allow full and detailed recording to be undertaken to the satisfaction of the Heritage Council.
08. The Applicant must ensure that the site under archaeological investigation is made secure and that the unexcavated artefacts, structures and features are not subject to deterioration, damage, destruction or theft during fieldwork.
09. The Applicant is responsible for the safe-keeping of all relics recovered from the site.
10. The Applicant must ensure that the approved Primary Excavation Director or an appropriate specialist, cleans, stabilises, labels, analyses, catalogues and stores any artefacts recovered from the site in a way that allows them to be retrieved according to both type and provenance.
11. The Applicant must ensure that a summary of the results of the field work, up to 500 words in length, prepared by the approved Primary Excavation Director is submitted to the Heritage Council of NSW within one (1) month of completion of archaeological field work.
12. The Applicant must ensure that a final excavation report is written by the approved Primary Excavation Director to publication standard, within one (1) year of the completion of the field based archaeological activity.
13. The Applicant must ensure that one (1) electronic copy of the final excavation report is submitted on CD to the Heritage Council of NSW together with two (2) printed copies of the final excavation report. The Applicant must also ensure that further copies are lodged with the local library and/or another appropriate local repository in the area in which the site is located. It is also required that all digital resources (including reports, context and artefact data, scanned field notes, other datasets and documentation) should be lodged with a sustainable, online and open-access repository.

14. The Applicant must ensure that the information presented in a final excavation report includes 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) and including geo-reference data;
- 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 Council 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; recommendations for the future management of the site and how much of the site remains undisturbed;
- i/. Details of how this information about this excavation has been publicly disseminated (for example, provide details about Public Open Days and include copies of press releases, public brochures and information signs produced to explain the archaeological significance of the site).

If you have any questions regarding the above advice, please feel free to contact Katrina Stankowski at Katrina.Stankowski@environment.nsw.gov.au.

Yours sincerely



Rochelle Johnston
Manager, Conservation
Heritage Division
Office of Environment & Heritage

As Delegate of the NSW Heritage Council

13/8/14