



Our Ref: DOC17/526431

Mr Andrew Beattie
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Dear Mr Andrew Beattie

RE: Redevelopment of UNSW Cliffbrook Campus, Coogee – Response to Submissions (SSD 8126)

Thank you for your invitation dated 24 October 2017 to comment on the Response to Submissions (RtS) Report for State Significant Development SSD 8126 for the Redevelopment of UNSW Cliffbrook Campus, Beech Street, Coogee. Cliffbrook is listed on the State Heritage Register – SHR No 00609.

The RtS Report, prepared by URBIS, dated 17 October 2017, including Appendix F, *Response to heritage issues* prepared by Weir Phillips Heritage dated 20 September 2017, has been reviewed. The RtS incorporates amendments to the design to address the issues raised in community and stakeholder submissions received during the public exhibition of the Environmental Impact Statement (EIS) for SSD 8126.

Some of the amendments as noted in Section 4 of the RtS relate to reduction in bulk and changes to design layout to mitigate visual impacts of the development on the state heritage listed values of Cliffbrook. These amendments are supported.

Amended plans for works to Cliffbrook and the Garage as noted in Appendix F are considered to have no major additional impacts on the overall heritage significance of the site. No objection is raised on the amended proposal.

For the Built Heritage matters, the recommended conditions of consent provided under delegation of the Heritage Council of NSW to the Department of Planning & Environment on 9 August 2017 remain unchanged.

It is noted that the RtS included the following as Appendix J:

- *Redevelopment of The UNSW Cliffbrook Campus 45-51 Beach Street, Coogee, NSW, State Significant Development Submission (SDD 8126) Revision A, Historical (non-Indigenous) Archaeology: Test Excavation Report, prepared by MDCA for the UNSW (Facilities Management) & the NSW Department of Planning & Environment, High Resolution Advance Copy - Thursday 22 June 2017.*

The above report documents the findings from the archaeological testing programme:

The test trenching program demonstrated that the site was significantly modified to accommodate the construction of the extant Cliffbrook mansion and its setting (as well as the AAEC buildings constructed later). East and west of Cliffbrook, TT's 2 and 4 demonstrate that post-demolition of the gatehouse-stables complex, the landscape was significantly built up to accommodate the roadworks and landscaping around the mansion. This appears to have involved the compaction of demolition and construction deposits and the introduction of fill units in some locations. (p. 83).

The report recommends historical archaeological monitoring of future works that involve extensive excavation as detailed in Recommendations 2 and 3, including: the underground carpark approach ramp, the VRF/VRV mechanical plant in the extreme northwest corner of the site (where any excavations for footings and/or associated inground services are greater than 250 mm below existing ground level), the new electrical substation, pathways and ramp in the location of the former gatehouse (where any excavations for footings and/or associated inground services are greater than 900 mm below existing ground level) (p. 85). The report has also recommended use of an Unexpected Finds Protocol (p. 85).

Given the findings from the historical archaeological testing, the above recommendations are supported and it is considered that the following additional Conditions should be placed on the Project if it is approved:

- Before excavation that may disturb archaeological 'relics', the Proponent must nominate a suitably qualified Excavation Director who complies with the *Heritage Council of NSW's Criteria for Assessment of Excavation Directors* (July 2011) to oversee and advise on matters associated with historic archaeology and advise the Department and OEH. Where archaeological monitoring of excavation is required, the Excavation Director must be present to oversee the excavation and advise on archaeological issues. The Excavation Director must be given the authority to advise on the duration and extent of oversight required to ensure that archaeological 'relics' are recorded to an adequate standard.
- A final archaeological report must be submitted to the Heritage Council of NSW within one year of the completion of archaeological excavation on the project.
- The Proponent must ensure that if substantial intact archaeological deposits and/or State significant relics not identified in the Archaeological Assessment prepared for the project are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified in accordance with s.146 of the *Heritage Act 1977*. Additional assessment and approval from DPE may be required prior to works continuing in the affected area(s) based on the nature of the discovery.

If you have any questions regarding the above advice, please contact Shikha Jhaldiyal, Heritage Officer at the Heritage Division, Office of Environment and Heritage via email Shikha.jhaldiyal@environment.nsw.gov.au or by telephone: on 02 9873 8545.

Yours sincerely



Rochelle Johnston
Manager, Conservation
Heritage Division
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As Delegate of the Heritage Council of NSW
7 November 2017