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Via email: [Aditi.Coomar@planning.nsw.gov.au](mailto:Aditi.Coomar@planning.nsw.gov.au)

Dear Mr Gibson

**RE: Exhibition of Modification - Sydney Football Stadium Redevelopment, 40 – 44 Driver Avenue, Moore Park (SSD 9249-MOD-2)**

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I refer to your letter dated 28 May 2019 inviting comments from the Heritage Council of NSW and advice on recommended conditions for the modified State Significant Development application for the Sydney Football Stadium Redevelopment at 40 – 44 Driver Avenue, Moore Park. We understand the following modifications are proposed:

- Amend the scope of the Stage 1 demolition works to include removal of the ground slabs of the existing buildings, removal of part of the existing piles of the former stadium and associated stormwater diversion drainage works.

A review of the amended documentation associated with the Modified Environmental Impact Statement (EIS) has been undertaken, in particular:

- Appendix F: Addendum Archaeological Impact Statement, prepared by Curio Projects, dated May 2019.

Based upon this review, as delegate of the Heritage Council of NSW, I provide the following comments:

Although the Sydney Football Stadium building is not individually listed on any statutory heritage register, the subject site includes the State Heritage Register (SHR) listed item, the *Busby's Bore* located between Centennial Park to College Street, Sydney (SHR No 00568). The site is also located within the boundaries of the Sydney Cricket Ground HCA (Sydney LEP 2012), and is adjacent to the *Sydney Cricket Ground - Members Stand and Lady Members Stand* (SHR No 00353), at Driver Avenue. It is in the vicinity of *Centennial Park, Moore Park, Queens Park* (SHR No 01384) and other state and local heritage items and Heritage Conservation Areas (HCAs).

Additionally, the site is listed by the National Trust for its social significance and architectural values.

**Built Heritage**

It is noted no addendum Heritage Impact Statement (HIS) was provided. The EIS modification document prepared by Ethos Urban, dated 21 May 2019, states that the development is substantially the same as that originally proposed and the modifications

would result in no additional adverse impacts on built heritage that cannot be appropriately managed and mitigated.

In a letter dated 16 July 2018, the Heritage Division provided comments recommending additional information be requested. Following review of the proposed modifications, these comments remain unchanged. Please see attached letter for Heritage Division comments relating to built heritage.

### **Historical Archaeology**

As noted in the EIS due to the extensive modifications for the current stadium the study area retains a low potential for archaeological remains associated with the former Engineers/Military Depot and the Sydney Sports Ground. It also notes that Busby's Bore is known to be present within the study site, including shafts 9, 10 and 11 and intervening shaft 4, however the exact locations of only shafts 9 and 10 have been able to be confirmed.

An Addendum Archaeological Assessment has been prepared by Curio Projects to assess the changes to archaeological impacts from the modification. The assessment indicates that generally the works are located in areas without historical archaeological potential. Unexpected finds are considered sufficient for these areas. One area, a small section of the trenching required for the diversion of the stormwater main is located within an area of Low to Moderate archaeological potential. For this area archaeological monitoring is recommended. Overall, this assessment is considered to be appropriate.

#### *Recommended Conditions relevant to historical archaeology:*

To ensure that any future development of the site appropriately assesses and manages archaeological impacts the following is recommended:

- All recommendations of the report entitled 'Archaeological Assessment for Sydney Football Stadium, Stage 1 Concept Design' prepared by Curio Projects, dated 5 June 2018 should be implemented by the proponent.
- All recommendations of the report entitled 'Addendum Archaeological Impact Assessment Sydney Football Stadium Redevelopment Stage 1 SSDA 4.55 Modification, prepared by Curio Projects, dated May 2019, should be implemented by the proponent.

#### *Recommended Historical Archaeological Advice for future stages of this project.*

*Busby's Bore* is an item of Engineering Significance at a State Level recognised by its listing on the State Heritage Register. To ensure the next stage of the project does not harm *Busby's Bore* the following advice is reiterated to the DPE to provide to the applicant for the next stage planning of detailed design:

- *Busby's Bore* should be subject to additional investigation to confirm its precise locations within the site. This is essential to informing the detailed design stage to ensure this State Heritage Register item is protected and should occur as soon as possible.
- *Busby's Bore* should be avoided by the project to ensure the significance of this item is retained. All measures should be considered to avoid this item from direct or indirect impacts, including obtaining the advice of a structural engineer.
- An additional archaeological assessment or an amendment of the current archaeological assessment should be completed for all subsequent stages of the project, to assess the impacts of development on the archaeological information at the site.
- An appropriate archaeological research design and excavation methodology should be prepared by a suitably qualified Excavation Director for review by the Heritage Council of

NSW or its delegate for any works which will impact archaeological information or *Busby's Bore*.

If you have any questions regarding the above advice, please contact Caitlin Stevens, Senior Heritage Assessment Officer, Heritage Division, Office of Environment and Heritage, at email [Caitlin.Stevens@environment.nsw.gov.au](mailto:Caitlin.Stevens@environment.nsw.gov.au) or on telephone: 9895 6582.

Yours sincerely



**Steven Meredith**

Regional Manager, Southern Region  
Heritage Division, Office of Environment and Heritage

**As Delegate of the Heritage Council of NSW**

25 June 2019