



Our Ref: DOC18/384279

Ms Karen Harragon
Director
Social and Other Infrastructure Assessments
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

By email: Aditi.Coomar@planning.nsw.gov.au

Dear Ms Harragon

RE: Notice of Exhibition – Sydney Football Stadium Redevelopment, 40 – 44 Driver Avenue, Moore Park (SSD 9835)

I refer to your letter dated 17 June 2019 inviting comments from the Heritage Council of NSW and advice on recommended conditions for the above State Significant Development application for the Sydney Football Stadium Redevelopment at 40 – 44 Driver Avenue, Moore Park.

It is noted that a staged approach to the planning applications is proposed which includes:

- Stage 1 – Concept proposal for the stadium envelope and supporting retail and functional uses as well as development consent for the carrying out of early works, including demolition of the existing facility and associated structures.
- Stage 2 – Detailed design, construction and operation of the stadium and supporting business, retail and functional uses.

The current application relates to the Stage 2: Design, Construction and Operation.

The below comments are based on the Planning Secretary's Environmental Assessment Requirements for SSD 9835 (issued 10 April 2019) and on the review of the following documents accompanying the Environmental Impact Statement (EIS) prepared by Ethos Urban.

- Appendix B1: Architectural Design Statement Report, prepared by Cox Architecture, dated 12 June 2019.
- Appendix B2: Architectural Drawings, prepared by Cox Architecture.
- Appendix DD: Heritage Interpretation Strategy, prepared by Curio Projects, dated 31 May 2019.
- Appendix T: Heritage Impact Statement and Archaeology Research, prepared by Curio Projects, dated 31 May 2019.
- Appendix W: Visual and View Assessment, prepared by Ethos Urban, dated 31 May 2019.

Visual Impacts

Engineering Heritage

Busby's bore is the key SHR listed item that runs underneath the subject area. The exact location of this engineering heritage item of State significance was sought as part of the

Stage 1 SSD comments. Clear guidance on what would be required to guide the Stage 2 investigations, including to understand the exact location of the bore in relation to the proposed SFS works was recommended.

Table 1.3 (CP-HER2) of the supporting SOHI identifies the need for further investigative works for the Bore's location. This is outlined in a series of mitigation measures attached to the conditions of consent for SSD 9249 - Stage 1 of the Sydney Football Stadium (SFS) which allowed concept approval, early-works and demolition of the SFS redevelopment.

The SOHI goes on to identify in Table 2.3 under (Compliance with Busby's Bore Draft CMP Policies) that the location of Busby's Bore has been inconclusive in identifying in confirming the alignment of Busby's bore within the subject site. However, the table goes on to state:

'it is believed that the development will have no impact to the heritage items due to the depth of the bore in comparison to the development impacts – which will not [extend] to the depth of the bore), and mitigation measures have been introduced to monitor this both structurally (e.g. vibration sensors installed within Shaft 10), as well as archaeologically (Targeted monitoring of construction works in the vicinity of the bore)'.

Further advice in this document has provided greater clarity on the above statements, identifying the investigation in 2019 in an area of a potential additional shaft removed over 10 tonnes of 20th century building rubble and was unable to reach to top of the bore. The result of this investigation indicates the horizontal bore is located at a depth of 12m below the existing ground level. On this basis, the Assessment has advised Busby's Bore will not be directly impacted by the SSD stage 2 development as the excavation required for this work will be less than 12m. To ensure this a condition is recommended to DPE to require excavation below 12m is not approved, unless further evidence to confirm the location and depth of the Bore is provided to clarify this impact and its avoidance.

Two of the bore shafts have been identified (Shafts 9 and 10) which are located in the north-east of the subject site. It is proposed to protect these known shafts during the works. A level of monitoring is proposed in the vicinity of the bore to ensure its protection during these excavation works.

Historical Archaeology

Historical Archaeological investigation is proposed in areas where archaeological potential for relics of Local significance which require management coincides with bulk-excavation. Other activities will involve adding fill to the site, which is likely to protect these deposits and piling which has been identified as being in so limited an area that prior or concurrent archaeological investigation is unlikely to provide meaningful results and is not recommended. These areas of management are shown in Figure 7.20 of the *'Heritage Impact Statement and Archaeology Research Design and Excavation Methodology' prepared by curio projects dated May 2019*.

Recommendations

To manage the potential adverse impacts to built heritage and archaeological relics within the study area, the following conditions are recommended:

1. The historical archaeological investigation (monitoring and salvage) for the Sydney Football stadium Stage 2 works shall be undertaken in accordance with the report entitled *'Heritage Impact Statement and Archaeology Research Design and Excavation Methodology'* prepared by curio projects dated May 2019'.
2. The archaeological program shall be directed by a suitably qualified and experienced historical archaeologist who can fulfil the requirements of the Heritage Council of NSW Excavation Director criteria at a state level of monitoring and testing to identify

and protect Busby's Bore. This person shall be responsible for managing the historical archaeological works under this SSD approval.

3. At the completion of the archaeological program, the Proponent shall ensure a final excavation report (including all site records and detailed artefact analysis) is prepared and submitted to the Department of Planning, Industry and Environment, the Heritage Council of NSW and the City of Sydney local studies library. This will ensure the results of the archaeological program are clearly explained to the public and accessible. The Proponent shall identify where the location of archaeological relics recovered from the archaeological program will be retained and conserved in perpetuity in this final report.
4. Nothing in this approval allows the removal of, or damage to, Busby's Bore.
5. Ongoing vibration monitoring is required during the SSD excavation works within Shafts 9 and 10. Vibrations should be limited to a maximum peak particle velocity of 5 mm/s.
6. An Interpretation Plan for the SFS shall be prepared in consultation with a nominated heritage consultant and must include the results of investigation into Busby's Bore & its shafts and the results of the historical and Aboriginal archaeological investigations undertaken for this SSD project. This Plan should be a comprehensive document that proposes specific methods to understand, interpret and present the significance of the SCG and surrounding heritage items.
7. This Interpretation plan must be implemented prior to occupation certificate being issued.

Separate from the historical archaeological values, the site is identified as likely to retain both cultural and archaeological values for Aboriginal people. This should be appropriately investigated and addressed according to referral to the Department of Planning, Industry and Environment administering the National Parks and Wildlife Act 1974.

If you have any questions regarding the above advice, please contact Caitlin Stevens, Senior Heritage Assessment Officer, Heritage, Community Engagement, Department of Premier and Cabinet, at email Caitlin.Stevens@environment.nsw.gov.au or on telephone: 9895 6582.

Yours sincerely



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Heritage Community Engagement,
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As Delegate of the Heritage Council of NSW
23 July 2019