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By email: Ferdinando.Macri@dpie.nsw.gov.au

Dear Mr Macri

SSD modification no. 7 application to Sydney Football Stadium Precinct Village and Car Park, SSD 9835

Thank you for your referral dated 26 October 2021 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal.

The proposed development involves a Precinct Village and Car Park to replace an open carpark area. The proposed modification involves a 1500 space multilevel carpark below ground level, egress point onto Moore Park Road and one 2-lane access point on Driver Avenue as well as other changes associated to parking. The proposal includes a 1500sqm café/retain/restaurants single storey pavilion (6m high), customer service office and ticket window, four tennis courts, children's playground as well as vertical transport and utilities.

State Heritage Register (SHR) listed items potentially impacted by the proposal are Busby's Bore (SHR no. 00568) located within the affected area, Centennial Park immediately adjacent and Sydney Cricket Ground- Members Stand and Lady Members Stand. A number of other locally listed and nationally listed heritage items are also located within or in vicinity of the affected area.

The following reports were considered in our assessment:

- *Section 4.55(2) Modification Application SSD 9835: Precinct Village and Car Park Sydney Football Stadium, 40-44 Driver Avenue, Moore Park* (Ethos Urban, 2021)
- *Sydney Football Stadium New Precinct Village and Car Park – MP1 Car Park: Heritage Impact Assessment* (Artefact Heritage, 2021)
- *Proposed drawings by Cox dated 10 September 2021*

As delegate of the Heritage Council of NSW, I provide the following comments:

- *Busby's Bore*

- The *Heritage Impact Statement* (HIS) does not explicitly discuss the SHR listing for Busby's Bore (SHR #00568). This may have some bearing on the assessment of the heritage item in the context of the proposal, particularly where the application states it is not within the site. Figure 6 of the SOHI (p. 7) shows that the Bore runs underneath the study area, yet the discussion in the HIS, from analysis of historic plans and figures against the site presumes the Bore extends outside and to the north of the site. Heritage NSW (HNSW) notes that this should be clearly established in the HIS, not reliant on documentation that has not been ground-truthed.

- Busby's Bore is a listed item on the Sydney Water s170 Heritage Register (#4571074). HNSW therefore recommends that advice on the heritage asset and the proposed modification is sought from Sydney Water.
- The HIS recommends that a Construction Heritage Management Plan (CHMP) be prepared, which should include: an updated version of the Methodology Statement-Working Near Busby's Bore; specific measures adopted to avoid direct and vibrational impacts to the spur and shafts of Busby's Bore; an archaeological methodology involving the monitoring of works within the vicinity of Busby's Bore and its shafts, as well as an Unexpected Finds Protocol for management of heritage identified outside of archaeological supervision; and heritage induction protocols. HNSW supports these recommendations.
- It is observed that a Construction Noise and Vibration Management Plan (CNVMP) has been approved for the development. The HIS recommends that a CNVMP be prepared which includes "...details of management measures to protect the archaeological heritage items including Busby's Bore in accordance with the requirements of the Methodology Statement- Working Near Busby's Bore..." (p. v, 5, 58). It is further noted that the *Section 4.55(2) Modification Application* report states that the approved Methodology Statement "...will be updated prior to commencement of works to ensure that vibration intensive works in the vicinity of Busby's Bore continue to be undertaken in a manner that minimises any risk of structural damage" (p. 40). HNSW supports this approach.
- HNSW recommends that the vibration monitoring assessment of Busby's Bore considers:
 - Physical access shafts/points to the Bore should be confirmed, which could be used to place the vibration monitor(s). For example, the HIS refers to Shafts 9–13 within the vicinity of the site and notes that Sydney Water plans indicate that two shafts are located on the spur beneath the site etc (p. 21–22).
 - If a new structure(s) is to be built directly over Busby's Bore or within its curtilage, then further design/engineering details depicting how these works and the carpark basement would interact with Busby's Bore, any Bore shaft(s) and the heritage curtilage would be beneficial, in order to demonstrate any (potential) heritage impacts on the item.
- The HIS assesses that (the fabric of) Busby's Bore would not be impacted by the proposal and that "if the spur or shafts are unexpectedly found to be within the study area redesign would be required" (p. v, 59). It is unclear to HNSW how feasible redesign is considered for the development at this stage. The HIS further states that "detailed construction and excavation plans are not yet to hand" (p. 47). This is a circumstance that could result in unanticipated impacts to Busby's Bore and/or the heritage curtilage.

- Recommendation to DPIE

Given that the potential impacts to Busby's Bore have not been fully assessed to date, HNSW does not support the modification at this time. HNSW may provide additional advice or recommend conditions once this information is received.

- Historical archaeology

- The HIS has identified four historical land use phases at the site, Phase 1: 1811– The Sydney Common; Phase 2: 1827– Busby's Bore; Phase 3: 1849-1890– Victoria Barracks Rifle range; and Phase 4: 1899-1986– Sydney Sports Ground (Sections 4.0, 6.2).

- The HIS assesses that the highest potential for archaeological survival on site is Busby's Bore and associated evidence (Phase 2), such as vertical access shafts and mining activity etc (Sections 6.2, 6.5). This HIS discusses that there is a low likelihood for other surviving archaeological evidence, particularly given the bulk excavations carried out on site during the demolition of the Sydney Sports Ground in 1986 (i.e. Section 7.2.1). HNSW considers the assessment of archaeological potential as reasonable.
- The Significance of Busby's Bore has been confirmed through its State Heritage Register listing under the *Heritage Act 1977*. It is not in question.
- The HIS recommends that excavation works within the vicinity of Busby's Bore and its shafts be subject to archaeological monitoring "...by an appropriately qualified archaeologist under the supervision of an accredited excavation director" (p. v, 5, 58). HNSW supports this approach and recommends that it is stipulated that any works within the curtilage of Busby's Bore are subject to archaeological management. Further, any archaeological program on site should be underpinned by an Archaeological Research Design and Excavation Methodology (ARDEM).
- The assessment of archaeological impact will require updating once the development construction works are finalised.

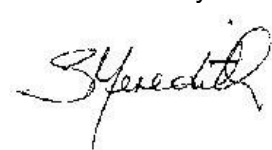
- *Built heritage*

- It is noted that there will be some visual impact on the adjacent SHR items which is considered acceptable.

As the site contains several local heritage items, and other local items are in the vicinity, advice should be sought from the relevant local council.

If you have any questions regarding the above advice, please contact Rajat Chaudhary, Senior Heritage Assessment Officer at Heritage NSW on 9873 8521 or rajat.chaudhary@environment.nsw.gov.au.

Yours sincerely



Steven Meredith
 Director
 Heritage Programs
 Heritage NSW
 Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
 23 November 2021