



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 9249)

I refer to your letter dated 12 June 2018 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 1 Concept Proposal and the concurrent Stage 1 works.

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

- Appendix L: Heritage Impact Assessment, prepared by Curio Projects, dated June 2018.
- Appendix M: Archaeological Assessment, prepared by Curio Projects, dated June 2018.

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

The Heritage Division notes that the Sydney Football Stadium is ranked as having high significance in the *Sydney Cricket and Sports Ground – Conservation Management Plan – Draft (SCG CMP)*, prepared in 2013 by Godden Mackay Logan. It is further noted that although the Heritage Impact Statement (HIS) references the CMP in its assessment, a copy of the document has not been provided with the SSD submission. The HIS states that the CMP bases the site's heritage values on its historical significance as '*...a venue for significant sporting matches, concerts and events over the years; for its historic associations with the architectural firm Philip Cox and Partners; for its aesthetic significance as a technologically advanced design and creative landmark in Sydney; and for its social significance as a large sporting venue...*' The draft CMP includes policies for the retention and conservation of the high heritage significance of the Sydney Football Stadium and recommends that an SECP (Specific Elements Conservation Policy) be prepared for the stadium to guide any future management and adaptive works.

The HIS contests the above assessment contained in the draft CMP and states that the significance of the existing Sydney Football Stadium primarily relates to '*...its continuity of use and its intangible heritage value which relates to the long-term use of the site for sporting activities dating back to the late 1800s, and its visual dominance and significance within as a stadium within the Moore Park Road Streetscape and as part of the wider SCG site*', and not the stadium building itself. The HIS concludes that the proposed development would have a neutral impact on the heritage values of the site and surrounds. The statement is, however, not supported by any comparative analysis of similar types of stadium developments in Sydney and NSW or a comparative study of body of works by Philip Cox and Partners. The HIS lacks a comprehensive assessment of the heritage significance of the Sydney Football Stadium and the level of heritage impact posed by its demolition.

Given the above noted inconsistencies in the assessments provided in the draft CMP and the HIS and the insufficient heritage assessment provided in the HIS, it is considered that further information should be sought. It is recommended that the Department of Planning and Environment (the Department) seeks the following information from the applicant prior to determining the application:

- A detailed comparative analysis of similar types of stadium developments in Sydney and NSW and a comparative study of the body of works by Phillip Cox and Partners to further evaluate the significance of the Sydney Football Stadium building at State and Local levels. The additional assessment should be prepared by an appropriately qualified specialist on Modernist Architecture.
- Amended HIS and proposal to address the findings of the above noted comparative analysis and assessment.

A copy of the draft CMP should also be sought given the considerable referencing the HIS makes to this report.

It is also noted that the Concept Proposal is for an enlarged footprint and envelope than the existing building, which has the potential to adversely impact on significant historic view lines from, to, and within the Sydney Cricket and Sports Ground (including the *Sydney Cricket Ground - Members Stand and Lady Members Stand* – SHR No 00353) and other state listed items in the vicinity (including *Centennial Park, Moore Park, Queens Park* – SHR No 01384).

As the subject site is part of the Sydney Cricket Ground HCA (Sydney LEP 2012) and is located in the vicinity of numerous local heritage items, early collaboration with local councils is recommended on mitigating impacts to these items and on urban design, visual amenities and landscape treatment associated with the project.

Historical Archaeology

The Archaeological Assessment Report prepared by Curio Projects indicates that 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.

The report notes that for the Stage 1 development, demolition of the current site is to ground level only and this will not impact archaeological information or Busby's Bore, but that impact may occur at later stages through the Stage 2 detailed design and construction of the new stadium including a basement. With regards to archaeological matters, this assessment is considered an appropriate level of assessment for Stage 1.

Recommended Conditions for Stage 1 relevant to historical archaeology:

As noted above, archaeological information is not anticipated to be impacted during Stage 1 as demolition is to ground level only, however the following recommendations are made to ensure that any future development of the site appropriately assesses and manages archaeological impacts:

- 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.

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 also provided 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 Shikha Jhaldiyal, Senior Heritage Assessment Officer, Heritage Division, Office of Environment and Heritage, at email shikha.jhaldiyal@environment.nsw.gov.au or on telephone: 9873 8545.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rajeev Maini', with a horizontal line drawn underneath.

Rajeev Maini

A/ Regional Manager, Southern Region

Heritage Division

Office of Environment and Heritage

As Delegate of the Heritage Council of NSW

16 July 2018