



File No: SF18/90954
Ref No: DOC18/779389

Mr Cameron Sargent
Team Leader, Key Sites Assessments
Department of Planning & Environment
23-33 Bridge Street
SYDNEY NSW 2000

Sent by e-mail to: Ellen Mannix <Ellen.Mannix@planning.nsw.gov.au>

Dear Mr Sargent

Request for comment EIS Exhibition for 80-88 Regent Street, REDFERN, NSW (SSD 9275)

Reference is made to your correspondence received on 15 October 2018 requesting comment on the Environmental Impact Statement from the Heritage Council of NSW (the Heritage Council) for the above proposal.

The proposed State Significant Development (SSD) site does not contain and State Heritage Register listed items. There are some locally listed heritage items in the vicinity, although not in the subject site.

The subject site was subject to an earlier SSD 7080 application and approval including a historical archaeological assessment and Statement of Heritage Impact. The Heritage Division provided SEARS and review of the supporting EIS for that application. An updated archaeological assessment has been provided for this application as follows:

- 80-88 Regent Street Redfern, Historical Archaeological Assessment, prepared by Urbis, dated 10 August 2018.

The archaeological assessment identified the subject land was not subject to development until the late 1860s, with the construction of five terraces. These were replaced by five terraces on the site in 1904 which are still extant today. While the assessment considered there was a low to moderate potential for archaeological material associated with the 1860s terraces on the site, this material would be unlikely to have sufficient research potential to meet the threshold for local or State heritage significance. The assessment considered that the disturbance on the site, the late occupation of the area and the likelihood that artefacts would not be in cesspits or underfloor deposits due to sewer collection and construction methods combined to render the site unable to provide sufficient research potential to warrant detailed archaeological investigation. It recommended unexpected finds procedures be put in place for the project.

The archaeological assessment is considered to provide an appropriate understanding of the site, which is not considered to have potential to contain archaeological relics of local or State heritage significance.

However, the unexpected finds procedure was not considered to be of sufficient detail for the site. As noted in the archaeological assessment, some archaeological material is expected, however it is not expected to meet the threshold for heritage significance. Any unexpected finds procedure should indicate exactly what is considered to warrant an 'unexpected find' in the context of the historical archaeological assessment – for example a relic of State or local significance. This could then be used to clearly guide excavation and development teams during the works.

Based on the review of the archaeological assessment the following recommendations are made for the condition of consent for the project:

1. The current Stop Work procedure should be revised to express what is likely to be present on the site (expected finds) and conversely what would actually be an unexpected find. This should also include where substantially intact archaeological deposits which, based on the existing assessment, are not anticipated within the subject land.
2. If any archaeological relics are identified through the Stop Work Procedure during construction, all work shall immediately cease in the immediate area and a suitably qualified and experienced historical archaeologist should assess the find to determine its significance. This should result in a written assessment of the nature and significance of any relics and how it is proposed to manage them within the development activity. This information shall be submitted for the approval of the Secretary, Department of Planning and Environment and the delegate of the Heritage Council of NSW.

Reason: While there is minimal potential for archaeological relics as demonstrated by the archaeological assessment, stop work procedures ensure that unexpected archaeological relics are managed appropriately. This is a requirement of s146 of the Heritage Act 1977.

If you have any questions regarding the above matter, please contact Rebecca Newell, Archaeologist at the Heritage Division, Office of Environment and Heritage on telephone (02) 9876 8632 or by e-mail: Rebecca.Newell@environment.nsw.gov.au.

Yours sincerely



31 October 2018

Dr Siobhan Lavelle, OAM
Senior Team Leader, Specialist Services
Heritage Division
Office of Environment & Heritage

As Delegate of the Heritage Council of NSW