



Our ref: DOC20/931022-8
Your ref: SSD-10382

Mr Rodger Roppolo
Senior Planning Officer
Key Sites Assessments
Department of Planning, Industry and Environment
email: rodger.roppolo@planning.nsw.gov.au

Advice provided via the Major Project Portal

Dear Mr Roppolo

Notice of Exhibition – 90-102 Regent Street, Redfern – Student Accommodation (SSD 10382) (City of Sydney)

Thank you for your referral dated 10 November 2020 inviting comments from Heritage NSW on the exhibited Environmental Impact Statement (EIS) for the above State Significant Development (SSD) proposal. We note the development involves demolition of existing structures on site and the construction of an 18-storey building with the ground floor comprising retail, communal spaces, offices, and above units comprising student housing.

Heritage NSW has reviewed the following documents as part of our assessment:

- *Environmental Impact Statement – Wee Hur Student Housing, 90-102 Regent Street, Redfern*, prepared by Urbis, dated 4 November 2020
- *Appendix C - 90-102 Regent Street Redfern – Aboriginal cultural heritage assessment report (ACHAR)*, prepared by Artefact Heritage, dated October 2020
- *Appendix D - 90- 102 Regent Street Redfern –Statement of Heritage Impact (SOHI)*, prepared by Artefact Heritage, dated October 2020.

We provide the following comments in relation to Aboriginal cultural heritage regulation matters.

Aboriginal cultural heritage regulation review of EIS, ACHAR and SOHI

The Aboriginal Cultural Heritage Assessment Report (ACHAR) identifies the entire development to be of low archaeological potential to contain Aboriginal cultural heritage. No Aboriginal objects or sites were identified during the assessment. We note no areas of ground surface visibility were present within the study area with an effective survey coverage of 0%. The ACHAR identifies this is due to the area already being impacted by existing residential development. While no test excavations have been undertaken to confirm any subsurface potential, the ACHAR reports that the results of geotechnical investigations and a review of historical records have confirmed the study area has been subject to moderate - high levels of subsurface disturbance.

The ACHAR provides four recommendations:

- No further archaeological investigation is recommended.
- The proposed development should continue to investigate methods to incorporate Aboriginal cultural heritage values into the proposed design.
- If suspected human remains are located during any stage of the proposed works, work must stop immediately, and the NSW Police notified. An Archaeologist or Physical

Anthropologist should be contacted in the first instance where there is uncertainty whether the remains are human.

- An unexpected finds procedure must be in place throughout the proposed works, with procedures in place for notification of a heritage consultant, Heritage NSW, Metropolitan Local Aboriginal Land Council and the Registered Aboriginal Parties where unexpected finds are identified.

We note the mitigation measures for Aboriginal cultural heritage outlined in Table 18 in section 8 of the EIS (page 96) only reference an unexpected finds procedure to be in place throughout the proposed works. We do note the EIS and SOHI contain a mitigation measure requiring an Archaeological Research Design and Methodology to be prepared prior to the commencement of works. An archaeological testing program is then to be completed if any non-Aboriginal archaeology is found.

Aboriginal cultural heritage regulation advice

While the proposed development appears to have low potential to impact on Aboriginal cultural heritage, we support the need for appropriate mitigation and management measures to be adopted to accommodate unexpected finds during the site preparation and construction process.

We also provide the following recommendations:

- The preparation of any non-Aboriginal archaeological research design and methodology is to include consideration of Aboriginal cultural heritage values to address whether the project area does have potential for Aboriginal objects
- We support the preparation of an Unexpected Finds Protocol for Aboriginal objects as part of any Construction Environmental Management Plan for the site during all development works
- We support ongoing consultation with the Aboriginal community as part of construction works and design and recommend a Heritage Interpretation Strategy be prepared that incorporates Aboriginal history and cultural heritage.

If you have any questions regarding the above advice please contact me on (02) 6229 7089 or via email at jackie.taylor@environment.nsw.gov.au.

Yours sincerely



Jackie Taylor

**Senior Team Leader, Aboriginal Cultural Heritage Regulation - South
Heritage NSW**

14 December 2020