



Our ref: DOC20/956163-12
Your ref: SSD-10384

Ms Emily Dickson
Principal Planning Officer
Key Sites Assessments
Department of Planning, Industry and Environment
email: emily.dickson@planning.nsw.gov.au

Advice provided via the Major Project Portal

Dear Ms Dickson

Notice of Exhibition – Sirius building, 2-60 Cumberland Street, The Rocks (SSD 10384)

Thank you for your referral dated 19 November 2020 inviting comments from Heritage NSW on the above State Significant Development proposal. We note the proposed development is for the adaptive reuse of the existing Sirius building, including alterations and additions, along with upgrades to existing public infrastructure known as the Public Domain Works.

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

- Environmental Impact Statement – *Restoration and refurbishment of the Sirius site State Significant Development Application – SSD 10384, 2-60 Cumberland Street, The Rocks* (EIS), prepared by Architectus, dated 30 October 2020
- Appendix Q - *Aboriginal cultural heritage assessment: Sirius Site, 2-60 Cumberland Street, The Rocks* (ACHAR), prepared by Urbis, dated 26 October 2020

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

Aboriginal cultural heritage regulation review of EIS and ACHAR

The Aboriginal Cultural Heritage Assessment Report (ACHAR) identifies the subject area to have nil to extremely low archaeological potential, including in the area of proposed Public Domain Works. No Aboriginal objects or sites were identified during the assessment. While no test excavations have been undertaken to confirm any subsurface potential, the ACHAR describes the subject area as having experienced extremely high levels of disturbance as a result of continuous development and redevelopment since the late 19th century, with the current building extending below natural sandstone bedrock level.

While the ACHAR records no Aboriginal cultural values were identified by the Registered Aboriginal Parties (RAPs) specific for the subject area, we note two RAPs did highlight significance of the local area.

The ACHAR provides four recommendations:

- Implementation of an Archaeological Chance Find Procedure.
- Implementation of a Human Remains Procedure.
- Ongoing consultation with the RAPs for the project.
- Development of an Aboriginal Cultural Heritage Interpretation Strategy in consultation with the RAPs.

We note the mitigation measures for Aboriginal cultural heritage outlined in Table 12 in section 9.1 of the EIS (page 134) reference the recommendations in the ACHAR prepared by Urbis. The EIS also notes that additional mitigation measures may arise through the course of approval processes.

Aboriginal cultural heritage regulation advice

While the proposed development appears to have low potential to impact on Aboriginal cultural heritage, we note that there is a more recent recording of an Aboriginal site to the south of the footprint. AHIMS 45-6-3762 consists of two stone artefacts located during historical archaeological excavations in a disturbed European context within underfloor features.

As such, we support the recommendations outlined within the ACHAR requiring the preparation and implementation of an Archaeological Chance Find Procedure. This needs to form part of the Construction Environmental Management Plan for the site and be undertaken in consultation with the RAPs. We also support the development of an Aboriginal Cultural Heritage Interpretation Strategy in consultation with the RAPs.

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
17 December 2020