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By email: [Emily.Dickson@planning.nsw.gov.au](mailto:Emily.Dickson@planning.nsw.gov.au)

Dear Ms Dickson

### **Notice of Exhibition: UTS Blackfriars Precinct Research Building – Stage 2 (SSD – 9571)**

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I am writing in reference to the above State Significant Development application for the proposed UTS Blackfriars Precinct Research Building currently undergoing a Public Authority Consultation.

The Blackfriars Precinct **is not** listed as an item on the State Heritage Register but is listed as an item of local significance on the Sydney Local Environment Plan, 2012. Although several items of local significance, there are no items of state significance located in the vicinity. It is noted that the site is known to be of archaeological interest and may contain state significant archaeological heritage.

The proposal includes the following:

- Demolition of two later addition buildings to the northern section of the site and construction of a new industry hub comprising two basement levels with 5 storeys above ground;
- Construction of a screen wall around a new substation building;
- Dismantling of a modern terrace addition along the northern elevation of the 1883 Boy's school building to provide vehicular access to the new substation building;
- Repair, reconstruction and conservation works to the 1883 sandstone and cast-iron palisade boundary fence around the site;
- New landscaping including paving, seating and bicycle parking area; and
- Implementation of public art works and an interpretation strategy.

We have reviewed the following documentation in order to prepare this letter:

- Architectural Drawings prepared by Tonkin Zulaikha & Greer Architects;
- Architectural Design Report prepared by Tonkin Zulaikha & Greer Architects, dated 02 August 2018;
- Heritage Drawings prepared by Paul Davies Pty Ltd, dated 20 August 2018;
- Heritage Impact Statement prepared by Paul Davies Pty Ltd, dated July 2019;
- Heritage Impact Supplement prepared by Paul Davies Pty Ltd, dated 14 June 2018;
- Archaeological Test Excavation Report prepared by AMAC Archaeological, dated August 2019; and
- Landscape Drawings prepared by Tonkin Zulaikha & Greer Architects, dated July 2019.

Our review of the documentation indicates that the subject property and proposed works would not have an impact upon any items of built heritage, listed under the *Heritage Act 1977*.

We note that the Blackfriars Precinct is a known archaeological site and the documents provided included an Archaeological Testing report. That report indicated that the testing program could not be fully completed due to the depths of the fill in parts of the site and unexpected groundwater. Nevertheless, the testing did encounter evidence potentially related to the Brisbane Distillery which operated at the site from 1824 to 1852, then being extended and operated as a Mill until 1878. This comprised a wall footing and a paved surface. Remains from this era are of State significance, especially if they survive intact and interpretable.

The proposed development includes a two-level basement and all archaeology within the basement footprints would be removed. The development also requires contiguous boundary piles which would also remove any archaeology in their path.

Consent Condition B.9 on SSD 6746 required that the archaeological testing be used to inform the basement design, and that the testing must confirm what archaeology survives at the site. The submitted report has not met this condition as it advises a full testing program was not completed. The report also provides limited evidence of attempts to re-design the basement. It notes that other parts of the Concept Approval constrained the above ground building envelope and that the Blackfriars project would not be viable without the two-level basement. The report has also not met the other requirements of the condition as it does not outline opportunities for conservation in situ (as a preference), development and interpretation. The testing report concludes in Section 9.2:

*This study assessed that the site retains relics that range from potential local significance to potential State significance and has understood that the proposed development would impact those relics (Section 7.2). This study has concluded that those impacts could be mitigated by full archaeological salvage excavation, under an appropriate Research Design and Methodology, to record those relics for posterity, for research, for public interpretation and for future heritage planning in the Chippendale area.*

In effect, the archaeological report recommends no conservation in-situ. It recommends full archaeological salvage excavations (removal of all archaeology from the site). It is also noted that the EIS (p.29) has misquoted the actual findings from the archaeological report in the compliance with SSD 6746 conditions in Table 6.

If the Department agrees that this is appropriate, then Heritage NSW notes that additional Conditions would be required to manage an archaeological program going forward. Appropriate conditions would need to be similar to the following:

1. The Applicant must prepare an updated Archaeological Research Design and Archaeological Excavation Methodology to guide any future archaeological salvage excavations at the site. That ARD and Methodology should be approved by the Heritage Council of NSW.
2. Any archaeological excavations at the site must be directed by a suitable qualified and experienced Excavation Director who fulfils the Heritage Council's Excavation Director Criteria for the excavation of State significant archaeological sites.
3. A final Excavation report must be prepared within 6 months of the completion of archaeological salvage works on site. It must include details of any artefacts recovered, where they are located and details of their ongoing conservation and protection in perpetuity by the land owner. Copies must be provided to the Department, the Heritage Council and to a Local Studies Collection. Any additional investigations, monitoring or

other works can be included in an addendum to the main report if needed and must be submitted within 6 months of the end of the archaeological program.

4. An Interpretation Plan must be provided by the Applicant to the Heritage Council for review and comment. This must be finalised with Interpretation installed on site prior to the occupation of any new buildings. This plan must include details of the archaeological excavation of the site, with relevant artefacts, images or other elements incorporated into the completed development.

If you have any questions regarding the above advice please contact Mariyam Nizam, Senior Heritage Assessments Officer, at the Heritage NSW, Community Engagement, Department of Premier and Cabinet, on 9873 8521 or [Mariyam.Nizam@environment.nsw.gov.au](mailto:Mariyam.Nizam@environment.nsw.gov.au).

Yours sincerely

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

**Rajeev Maini**  
Senior Team Leader  
Regional Heritage Assessments South  
Heritage NSW, Department of Premier and Cabinet  
**As Delegate of the Heritage Council of NSW**  
6 December 2019