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Mr Simon Truong
Senior Planning Officer
Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Truong

RE: Heritage Council comments on Response to Submissions report by Sutherland Planning & Associates for Mixed Use Development at 175-177 Cleveland Street, Redfern

I refer to your email of 9 October 2014 inviting the Heritage Council of NSW (the Heritage Council) to provide any comments on the above report.

I refer to Section 5.1 of the Response to Submissions report by Sutherland Planning and Associates dated October 2014 which outlines the issues previously raised by Heritage Council's submission and the response. The response report indicates that the proponent has now undertaken a full archaeological assessment for the site which outlines a methodology to monitor, and if necessary salvage any archaeology present within the impact zone.

A review of the archaeological assessment report, *175-177 Cleveland Street, Redfern: Historical Archaeological Impact Assessment* by AHMS Archaeological & Heritage Management Solutions (October 2014), has found that it does not meet the standards which would normally be required for this type and scale of project. The main deficiencies of the report are the lack of detail in relation the methodologies for the historical archaeological mitigation and salvage programs, especially the standard and level of recording and reporting.

For your information I have attached an abridged copy of the Heritage Council's Standard Archaeological Conditions (Attachment A), should you wish to incorporate some or all of them into any recommended conditions of approval for the project to ensure that the archaeology is managed appropriately.

If you have any questions regarding the above advice, please feel free to contact Katrina Stankowski, Senior Team Leader, Archaeology at the Heritage Division, Office of Environment and Heritage, at Katrina.Stankowski@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rochelle Johnston', written in a cursive style.

Rochelle Johnston
Manager Conservation
Heritage Division
Office of Environment and Heritage

As Delegate of the Heritage Council of NSW

06 November 2014

Attachment A

Abridged Standard Heritage Council Archaeological Permit Conditions

1. The Proponent must ensure that a full historical archaeological assessment which contains mitigation measures in the form of an archaeological programme is undertaken by a suitably qualified and experienced historical archaeologist prior to any demolition works commencing on site.
2. The historical archaeological mitigation program must be undertaken by a suitably qualified and experienced historical archaeologist who meets the Heritage Council's Excavation Director Criteria for salvage excavation of locally significant sites after demolition but prior to site excavation.
3. The details of the nominated excavation director must be forwarded to the Heritage Council (or its Delegate) for approval prior to commencement of any archaeological programme on site.
4. The Applicant must ensure that the approved Excavation Director is present at the site supervising all archaeological fieldwork activity likely to expose significant relics.
5. The Applicant must ensure that the approved Excavation Director takes adequate steps to record in detail relics, structures and features discovered on the site during the archaeological works in accordance with current best practice. This work must be undertaken in accordance with relevant Heritage Council guidelines.
6. The Applicant must ensure that the nominated Excavation Director briefs all personnel involved in the project about the requirements of the NSW 'Heritage Act 1977' in relation to the proposed archaeological program. This briefing should be undertaken prior to the commencement of on-site excavation works.
7. The Applicant must ensure that the nominated Excavation Director and the excavation team is given adequate resources to allow full and detailed recording to be undertaken to the satisfaction of the Heritage Council.
8. The Applicant must ensure that the site under archaeological investigation is made secure and that the unexcavated artefacts, structures and features are not subject to deterioration, damage, destruction or theft during fieldwork.
9. The Applicant is responsible for the safe-keeping of all relics recovered from the site.
10. The Applicant must ensure that the approved Primary Excavation Director or an appropriate specialist, cleans, stabilises, labels, analyses, catalogues and stores any artefacts recovered from the site in a way that allows them to be retrieved according to both type and provenance.
11. The Applicant must ensure that a summary of the results of the field work, up to 500 words in length, prepared by the approved Primary Excavation Director is submitted to the Heritage Council of NSW within one (1) month of completion of archaeological field work.
12. The Applicant must ensure that a final excavation report is written by the approved Primary Excavation Director to publication standard, within one (1) year of the completion of the field based archaeological activity.

13. The Applicant must ensure that one (1) electronic copy of the final excavation report is submitted on CD to the Heritage Council of NSW together with two (2) printed copies of the final excavation report. The Applicant must also ensure that further copies are lodged with the local library and/or another appropriate local repository in the area in which the site is located. It is also required that all digital resources (including reports, context and artefact data, scanned field notes, other datasets and documentation) should be lodged with a sustainable, online and open-access repository.
14. The Applicant must ensure that the information presented in a final excavation report includes the following:
 - a) An executive summary of the archaeological programme;
 - b) Due credit to the client paying for the excavation, on the title page;
 - c) An accurate site location and site plan (with scale and north arrow) and including geo-reference data;
 - d) Historical research, references, and bibliography;
 - e) Detailed information on the excavation including the aim, the context for the excavation, procedures, treatment of artefacts (cleaning, conserving, sorting, cataloguing, labelling, scale photographs and/or drawings, location of repository) and analysis of the information retrieved;
 - f) Nominated repository for the items;
 - g) Detailed response to research questions (at minimum those stated in the Heritage Council approved Research Design);
 - h) Conclusions from the archaeological programme. This information must include a reassessment of the site's heritage significance; statement(s) on how archaeological investigations at this site have contributed to the community's understanding of the site; recommendations for the future management of the site and how much of the site remains undisturbed;
 - i) Details of how this information about this excavation has been publicly disseminated (for example, provide details about Public Open Days and include copies of press releases, public brochures and information signs produced to explain the archaeological significance of the site).