



Our ref: DOC22/78860

Mr Balazs Hansel
Director
Urbis
Angel Place, Level 8, 123 Pitt Street
SYDNEY NSW 2000

By email: bhansel@urbis.com.au

Dear Mr Hansel

Post Approval Submission for Comment for Atlassian Central (SSD 10405)

Thank you for your referral dated 20 January 2022 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD), to address condition E44 of the SSD/SSI consent.

The relevant SSD/SSI condition is:

- E44: *Prior to the commencement of archaeological test excavation, the Archaeological Research Design and Excavation Methodology prepared by Urbis for test excavation (ARD) shall be revised to guide the early works testing program. The ARD must be prepared in consultation with the Heritage Council of NSW (or its delegate) and submitted to and approved by the Planning Secretary. The ARD shall address Heritage NSW comments provided in response to the RtS dated 20 July 2021 including revision of test areas to investigate and understand the archaeological potential of key significant phases anticipated (including the Benevolent Asylum).*

The following documents were reviewed and comments are provided as Delegate of the Heritage Council of NSW:

- *Former Inwards Parcels Office Historical Archaeological Assessment and Research Design*, prepared by AMBS Ecology & Heritage, dated November 2021.

I provide the following comments:

- Heritage NSW concurs with the findings of AMBS that the subject site is likely to retain some historical archaeological potential of State heritage significance.
- Heritage NSW notes that the research questions as posed in section 7.1 (p. 61) of the supporting report are generally broad, and agrees with the consultant's own statement that these research questions would need to be expanded to better capture the archaeology of the subject site based on the results of the test excavations (p. 61). This will need to be reflected in the test excavation report to be submitted and approved by the Planning Secretary in consultation with the Heritage Council of NSW per Condition 45 of the SSD consent.
- The test excavation methodology as detailed in section 7.2.4 is acceptable and therefore endorsed, however Heritage NSW notes that a notification under s.146 of the *Heritage Act 1977* per Condition E46 has not been reflected in that methodology. In accordance with condition E46, a notification to the Heritage Council under s.146 of the *Heritage Act 1977* will be required in case that archaeological deposits and

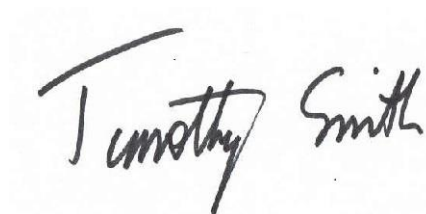
substantially intact evidence of State significance be uncovered during the archaeological testing.

- The number of proposed test trenches is sufficient and responds to the predicted archaeological potential.
- Apart from the methodology for testing, the supporting report also contains a methodology for “open area stratigraphic excavation...to salvage all archaeological remains within a defined area” (section 7.2.1, p. 62; section 7.2.5, p. 67). Heritage NSW notes that this methodology should not be understood as fulfilling Condition E47 of the SSD consent, which clearly states that: *Where State significant archaeological salvage is required, and prior to the commencement of archaeological salvage excavation, the Archaeological Research Design prepared by AMBS Ecology and Heritage dated September 2020 shall be amended to refine the salvage program based on the testing results. This document shall be prepared in consultation with the Heritage Council of NSW (or its delegate) and submitted to and approved by the Planning Secretary.* Therefore, the supporting report per the current submission will need to be modified and a site-specific methodology for archaeological salvage of State significant relics submitted, once the results of the archaeological testing are available (i.e. Conditions E45 and E46 fulfilled). Heritage NSW emphasises that per Condition E47 as quoted above, the site-specific salvage methodology for State significant relics is to be prepared with reference to these testing results.
- Overall, the supporting document above is sufficiently detailed to address condition E44 of the development consent.

If you have any questions regarding the above advice, please contact Dr Dragomir Garbov, Senior Assessments Officer, Major Projects at Heritage NSW, on 02 9995 6066 or dragomir.garbov@environment.nsw.gov.au.

Thank you for forwarding the report for our review.

Yours sincerely

A handwritten signature in black ink that reads "Timothy Smith". The signature is written in a cursive style with a large, sweeping initial 'T'.

Tim Smith OAM
Director Assessments
Heritage NSW
Department of Premier and Cabinet
As Delegate of the Heritage Council of NSW
11 February 2022