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Mr Ben Lusher Director Key Site Assessments Department of Planning & Environment GPO Box 39 SYDNEY NSW 2001

Attention: Mr Ben Lusher and Amy Watson email: amy.watson@planning.nsw.gov.au

Dear Mr Lusher

RE: Heritage Council Response to Submissions on Modification to the Concept Plan and Project Approval for a development at the former Rachel Forster Hospital (MP 07\_0029 MOD 1 and MP 09 0068 MOD 1)

Thank you for the opportunity to comment on the Response to Submissions (RtS) for MP 07\_0029 MOD 1 and MP 09\_0068 MOD 1 for modification to the Concept Plan and Project Approval for a development at the former Rachel Forster Hospital, Redfern, dated 14 November 2017.

The following supporting documents have been reviewed:

- Response to Submissions Report, prepared by Daniel McNamara: Planning Solutions (dmps), dated October 2017
- Heritage Impact Statement (HIS) prepared by Weir Phillips heritage, dated 23 June 2017;
- Structural Report, prepared by Australian Consulting Engineers Pty ltd, dated 1 June 2017;
- Former Rachel Forster Hospital Site, Pitt Street, Redfern, Revised Historical Archaeological Assessment, prepared by Extent, dated June 2017;
- Structural Letter regarding the colonnade support frame, prepared by Australian Consulting Engineers Pty ltd, dated 13 June 2017; and
- Letter regarding storage and condition of dismantled columns, prepared by Weir Phillips Heritage, dated 15 November 2017.

It is noted that there is additional information provided relating to the significant colonnade to the front façade, demolished without approval, including: a supporting letter from a structural engineer and a recommendation that the works to properly store the dismantled columns of the colonnade should be done in accordance with the specification outlined by the letter from the heritage consultant noted above.

A condition should be included for any approval to require the columns and associated elements of the colonnade to be managed in accordance with the specification outlined in the *Letter regarding storage and condition of dismantled columns*, prepared by Weir Phillips Heritage, dated 15 November 2017.

It is noted that a **revised** Historical Archaeological Assessment (HAA), prepared by Extent Heritage Pty Ltd dated June 2017, has been submitted in response to Heritage Council's recommendations dated 7 March 2017. This document has been reviewed and the following comments provided:

The assessment has indicated that the site retains archaeological potential along the eastern section of the project area, with evidence of structural remains, including brick footings and deposits. The proposal involves deep excavation extending into portions of the eastern margins of the site. Whilst the degree of archaeological potential has not been established in the HAA, it is noted that the eastern portion of the site has potential to retain undisturbed evidence of archaeological resources relating to the mid-19th to 20th century residential use of the site, including post holes, underfloor deposits, rubbish pits, cesspits and yard soils, with potential for archaeological resources related to 'Redfern Lodge', as well as associated outbuildings, paddocks and yard areas assessed as being of local significance. Geotechnical investigations indicate that the southern boundary of the subject site has potential to contain archaeological evidence up to 1m below the current ground surface. The HAA indicates that if archaeological resources survive within this area, they would most likely be associated with dwellings, yard deposits and outbuildings associated with mid-19th and 20th century residential development. It is recommended that the archaeological research design and methodology clarify the degree of potential within the eastern and southern portion of the project area to assist in determining the level of impact of the proposed works on surviving archaeological resources.

The HAA recommends that proposed excavation activities of more than 300mm depth within the eastern and southern portions of the site would involve archaeological monitoring to mitigate impacts to potential archaeological resources. The Unexpected Finds Procedure would be implemented during excavation elsewhere on the site. An archaeological salvage program is proposed, with consideration to interpretative opportunities following results of the archaeological investigations on the subject site.

It is recommended that the conditions of consent include a condition stating that all archaeological excavations are conducted in accordance with an archaeological research design and methodology in accordance with Heritage Council's best practice publications including 'Assessing Historical Archaeological Sites and Relics' 2009 and 'Archaeological Assessments' 1996, and submitted to the Heritage Council or its delegate for review and that all excavations are completed by an Excavation Director suitably qualified according to the Heritage Council Criteria for the Assessment of Excavation Directors.

If you have any questions regarding the above advice, please feel free to contact James Quoyle, Heritage Officer, Heritage Division, Office of Environment and Heritage, at email: <a href="mailto:james.quoyle@environment.nsw.gov.au">james.quoyle@environment.nsw.gov.au</a> or on telephone: 9873 8612.

Yours sincerely

Rajeev Maini

**Senior Team Leader** 

South Assessments, Heritage Division Office of Environment and Heritage

As Delegate of the Heritage Council of NSW

29 January 2018