



File: SF21/8135
Our ref: DO21/149224

Mr Joshua Madden
Senior Heritage Consultant
RPS Australia East Pty Ltd (RPS)

By email: Josh.Madden@rpsgroup.com.au

Dear Mr Madden,

SSD 10389 - Post Approval Comment on Conditions B23 and B34: Archaeological Research Design and Excavation Methodology and Nominated Excavation Director.

Thank you for your referral dated 2 March 2021 and 12 March 2021, accepted as a complete application on 3 March 2021, inviting comments from the Heritage Council of NSW on a submission lodged to satisfy conditions B23 and B24 of the State Significant Development (SSD) consent.

The submission is supported by:

- *'Liverpool Health and Academic Precinct – Main Works Archaeological Research Design and Excavation Methodology' prepared by RPS Group dated 19 January 2021. (ARD&EM)*
- *An email providing Excavation Director Criteria responses for Mr Joshua Madden and Ms Wendy Thorp dated 12 March 2021.*

As delegate of the Heritage Council of NSW, I provide the following comments against the two referred Consent Conditions:

Condition B23:

The ARD&EM for the project nominates two excavation directors as follows: Mr Joshua Madden (Primary Excavation Director) and Ms Wendy Thorp (Secondary Excavation Director). Condition B23 requires only one suitably qualified and experienced historical archaeologist to be nominated to manage a historical archaeological program.

Submissions were received from both nominated Excavation Directors under the Heritage Council of NSW's *Excavation Director Criteria 2019*. Mr Madden's response has demonstrated his ability against the criteria to manage relics of a comparative resource of local significance for testing and monitoring. Although only one Excavation Director is required by the DPIE conditions of consent, HNSW has also reviewed Ms Thorp's submission to the Excavation Director Criteria 2019. Ms Thorp's response has demonstrated that she has considerable archaeological experience and would satisfy the requirements for managing the proposed site. However, given the large volume of work Ms Thorp has conducted, HNSW notes that several final excavation reports remain outstanding according to our records.

Condition B24:

The ARD&EM has revisited the assessment of the site's archaeological potential and assessed the site against the Heritage Council significance criteria against relevant Guidelines. The site's significance now considers all phases of its occupation. It has also assessed there is limited archaeological potential due to analysis of site impacts over time. However, a three staged

archaeological program is proposed to investigate and manage the potential archaeological resource of significance (relics).

The three phased approach to archaeological investigation of the site's resources will start with testing (Phase 1), moving to salvage (Phase 2) and monitoring (Phase 3). Movement to salvage would only take place if the testing identifies archaeological resources of significance to manage. The areas identified for testing have the highest potential for archaeological relics to survive.

The research questions proposed consider all phases of site occupation. However, HNSW notes that a testing program requires questions that are more basic than those which may be warranted for salvage. If more detailed remains are discovered during testing which would warrant salvage, the research questions may require revision to include additional targeted research questions focused on the phase of occupation being salvaged. This in turn should be updated in the inform the final excavation reporting and in any site interpretation proposed.

Heritage NSW is satisfied that the ARDEM provided is satisfactory to ensure that the archaeological program has appropriate methods, questions and strategies in place to guide the archaeological investigation, recording and final reporting for this site.

If you have any questions regarding the above advice, please contact Felicity Barry, Senior Historical Archaeologist at Heritage NSW on (02) 9995 6914 or Felicity.Barry@environment.nsw.gov.au.

Yours sincerely,



16 March 2021

Dr Siobhan Lavelle, OAM

Senior Team Leader, Specialist Services

Heritage NSW

Department of Premier and Cabinet

As Delegate of the Heritage Council of NSW