



Karen Harragon  
Director, Social and Other Infrastructure Assessments  
Department of Planning & Environment  
320 Pitt Street  
SYDNEY NSW 2000

Attention Aditi Coomar, via email: [aditi.coomar@planning.nsw.gov.au](mailto:aditi.coomar@planning.nsw.gov.au)

Dear Ms Harragon

**NOTICE OF EXHIBITION FOR THE REDEVELOPMENT OF LORETO SCHOOL (SSD 7919),  
NO. 85 CARABELLA STREET, KIRRIBILLI**

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Thank you for the invitation to the Heritage Council of NSW to provide comments on the Environmental Impact Statement (EIS) for the redevelopment of Loreto School at 85 Carabella St, Kirribilli.

The following reports have been reviewed:

- Loreto Kirribilli Masterplan and Stage 1 Works Heritage Impact Assessment Statement Report prepared for Loreto Kirribilli by GML Heritage, July 2017.

Loreto School is not listed on the State Heritage Register (SHR) nor is it in the immediate vicinity of any SHR items. Consequently, no specific comments are offered for built or landscape heritage.

Concerning archaeology, the abovementioned HIAS report by GML Heritage included assessment of the historical archaeology of the Loreto Kirribilli site in Section 5.0. Three major phases of historical development were identified and assessed for their likelihood to have created surviving archaeological remains. Some early occupation was low intensity and unlikely to have left any substantial traces, other later developments of the school campus are also likely to have removed archaeology in parts of the site due to extensive excavations and terracing. Archaeological Potential is summarised in Table 5.1 of the report. There are some areas of the site where potential archaeological remains from nineteenth century properties would be of local significance. Those remains are associated with the Milson family, wealthy landowners and are of significance to locally. Archaeological remains, in particular artefacts from features such as wells, cesspits and rubbish pits, may provide evidence regarding the historical development of the local area.

Assessment of the impact of the proposed development on the Archaeology is provided in Section 8.0 of the report, assessed by individual Precincts within the Loreto site. In the Western Precinct, there is potential for archaeological remains of local significance beneath existing landscaped areas and courtyards situated between the later twentieth-century buildings, as well as beneath the B-Block building (the 1860s Tremayne property, and the 1850s Hermitage property). The Northern and Eastern Precincts have low potential for archaeology and impacts to significant archaeology is unlikely from works in these precincts. In the Southern Precinct remains may be encountered that relate to the 1850s Coreena property and the (extant) 1850s Elamang property (possible truncated footings of the stables, wells, rubbish dumps etc., which may be present directly below the modern ground surface).

Mitigation measures recommended in the GML report include archaeological monitoring and archaeological testing and archaeological salvage where remains are encountered and would be removed by the development. These strategies and areas are set out in Table 8.1. This is supported by the Heritage Division.

The following archaeological Conditions are recommended to be included in any approval of the proposal:

1. **Before excavation that may disturb archaeological 'relics', the Proponent must nominate a suitably qualified Excavation Director who complies with the *Heritage Council of NSW's Criteria for Assessment of Excavation Directors* (July 2011) to oversee and advise on matters associated with historic archaeology and advise the Department and OEH. The Excavation Director must be present to oversee the excavation and advise on archaeological issues. The Excavation Director must be given the authority to advise on the duration and extent of oversight required to ensure that archaeological 'relics' are recorded to an adequate standard.**
2. **Before excavation Research Design and Excavation Methodology is also to be prepared to guide any proposed excavations. This is to be provided to the Department and to the Heritage Council of NSW to confirm adequacy of the proposed methods.**
3. **A final archaeological report must be submitted to the Heritage Council of NSW within one year of the completion of archaeological excavation on the project.**
4. **The Proponent must ensure that if substantial intact archaeological deposits and/or State significant relics not identified in the Archaeological Assessment prepared for the project are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified in accordance with s.146 of the *Heritage Act 1977*. Additional assessment and approval from DPE may be required prior to works continuing in the affected area(s) based on the nature of the discovery.**

If you have any questions regarding the above matter, please contact Ed Beebe, Senior Heritage Assessment Officer at the Heritage Division, Office of Environment and Heritage on 02 9585 6045 or [ed.beebe@environment.nsw.gov.au](mailto:ed.beebe@environment.nsw.gov.au).

Yours sincerely



21 November 2017

**Dr Thomas Richards**  
Senior Team Leader, State Heritage Assessments  
Heritage Division  
Office of Environment & Heritage

**As Delegate of the Heritage Council of NSW**