

Level 6, 10 Valentine Avenue Telephone: 61 2 9873 8500 Parramatta NSW 2150 Locked Bag 5020 Parramatta NSW 2124

Facsimile: 61 2 9873 8599 heritagemailbox@environment.nsw.gov.au www.heritage.nsw.gov.au

> Our ref no: DOC19/536013 Your ref no: SSD 8996

Mr Andrew Beattie Team Leader, School Infrastructure Assessments Department of Planning and Environment GPO Box 39 SYDNEY NSW 2001

By email: Andrew.Beattie@planning.nsw.gov.au; Jason.Maslen@planning.nsw.gov.au

Dear Mr Beattie

## **RE:** Notice of Exhibition – Loreto Normanhurst concept proposal for the new campus wide masterplan and Stage 1 Works at 91-93 Pennant Hills Road, Normanhurst, NSW (SSD 8996)

I refer to your letter dated 24 June 2019 inviting comments from the Heritage Council of NSW and advice on recommended conditions, if approved, for the above State Significant Development application for Loreta Normanhurst (Concept Proposal and Stage 1 Works). The proposed development involves:

- Concept proposal:
  - Building envelopes for education and ancillary uses;
  - Increased student capacity:
  - Open space and landscape design;
  - New pedestrian and circulation arrangements;
  - o Associated works (tree removal, demolition, alterations to existing buildings/structures; site remediation and car parking).
- Stage 1 works
  - o (construction of 3-6 storey boarding house with underground carparking and loading dock);
  - o Demolition to maintenance building and the Loreta Community House and works to make good
  - Landscaping, pedestrian spaces and new loading dock
  - Associated works (tree removal, site remediation and utilities infrastructure).

The site does not include any items listed on State Heritage Register (SHR) but is locally listed in the Hornsby Local Environmental Plan 2013 as Loretto Convent Group – grounds gates and cemetery (Item 607) and A60 'Loretto Convent Group, Grounds, Gates and Cemetery'.

The following documents have been reviewed for the assessment:

- Environment Impact Statement Loreto Normanhurst 91-93 Pennant Hills Road, • Normanhurst, Concept Plan and Detailed Stage 1 Works State Significant Development (8996) prepared by Ethos Urban dated 18 June 2019
- Loreto Normanhurst Historical Archaeological Assessment Masterplan prepared by Ecological Australia for Allen Jack & Cottier on behalf of Loreto Normanhurst dated 17 January 2019;
- Loreto Normanhurst Historical Archaeological Assessment – Stage 1 Works prepared by Ecological Australia for Allen Jack & Cottier on behalf of Loreto Normanhurst dated 9 January 2019;

 Conservation Management Plan Loreto Normanhurst No. 91-93 Pennant Hills Road, Normanhurst, prepared by Perumal Murphy Alessi dated July 2008. This CMP is separated into two parts).

The application has recognised the Loreto site is of local significance for a number of elements of the convent school, including the cemetery, which is National Trust listed. The application was supported by a Conservation Management Plan, which is appropriate to identify significant fabric and guide its ongoing management and conservation. The CMP provides clear guidance on the need to retain and conserve the cemetery as part of the significance of the place.

The supporting documents have confirmed the site's earliest historical occupation phase is focused on the Loreto school from 1896, which limits the potential for archaeological deposits linked to the use of the buildings. Later redevelopment of the site is likely to have removed physical evidence from the school's occupation and development except for the cemetery which dates from 1899.

The Concept proposal identifies the introduction of Building Envelope 10 into the site which includes a Bush chapel and other associated elements linked to environmental aspects of the site. The cemetery is not in the immediate vicinity of the chapel (Refer to Figure 13 from the EIS) and will be separated by bushland. However, this aspect of the proposal (i.e. visual impacts) is not discussed in the EIS or archaeological assessments supporting the project. It would be appropriate for the future detailed design of the Chapel in the landscape to address the question of any potential visual impacts to the Cemetery. Advice is provided in this letter to the Applicant below. The proposed Stage 1 works are not located near the cemetery and are otherwise unlikely to disturb archaeological relics. Ecological Australia has recommended site protection mechanisms for this stage of site work under the SSD, if approved.

Recommended condition:

1. Nothing in this approval allows the removal of, or damage to, the Loreto Normanhurst Cemetery.

Advice for the future design of building Envelope 10 (the Chapel): The chapel should be appropriately placed in the landscape to reduce any visual impact to the cemetery. This may be achieved in materials, scale and positioning of the future building design.

If you have any questions regarding the above matter please contact Felicity Barry, Senior Historical Archaeologist, at Heritage, Department of Premier and Cabinet on 9995 6914 or at Felicity.Barry@environment.nsw.gov.au.

Yours sincerely

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23 July 2019

Dr Siobhan Lavelle OAM Senior Team Leader – Specialist Services Heritage, Community Engagement, Department of Premier and Cabinet As Delegate of the NSW Heritage Council