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Mr David Gibson
Team Leader
Social Infrastructure Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

By email: Leanne Grove [leanne.grove@planning.nsw.gov.au]

Dear Mr David Gibson

RE: SHORE SCHOOL PHYSICAL EDUCATION CENTRE (SSD 7507) – NOTICE OF EXHIBITION

Thank you for the invitation to the Heritage Council of NSW (Heritage Council) to comment on and provide recommended conditions of approval for the proposed SSD project at the Shore School Physical Education Centre located at Blue, William and Hunter Crescent, North Sydney. I am responding as the delegate of the Heritage Council.

The proposed Physical Education Centre includes the construction of a new Aquatic Centre and Multipurpose Sports Complex, additional classrooms, carpark extension and new landscaping. The proposal involves demolition of existing sports facilities at the school, and three residential flat buildings on Hunter Crescent.

A review of the documentation associated with the Environmental Impact Statement (EIS) has been undertaken, in particular the Heritage Assessment and Impact Statement (HAIS) dated June 2016 prepared by GML Heritage Pty Ltd.

Based upon this review, the following comments and recommended conditions are provided:

Built and Landscape Heritage:

It is noted that Shore School is not currently listed on the State Heritage Register and the Heritage Council does not have a statutory role in the planning process for built heritage matters related to the site. It is, however, listed as a heritage item of local heritage significance in the North Sydney LEP 2013. Heritage items in the vicinity, as listed in the HIS, are also of local significance. The site does however retain historical archaeological potential and this would normally require approval by the Heritage Council of NSW.

Historical Archaeological impacts:

The subject site was first historically occupied in the 1830s and this has continued since that time, however it is relevant to note that most of this occupation is situated within the greater Shores School site and is not within the immediate subject land. The Assessment provided by GML Heritage concluded there is potential for historical archaeological resources and relics dating from c.1850s onwards, which have been assessed as retaining local heritage significance. These deposits are likely to be associated with occupation associated with land subdivision activities of William Miller and within the subject land relate to later occupation which post-dates 1860. Most of the structures which date to this time are retained as extant structures in the School premises, e.g. the Barry and Hodges Boarding houses. Evidence of occupation at and post subdivision including mid 1850s, 1860s and post 1880s occupation may also be present within the areas of proposed impact, although it appears likely this will include either ephemeral evidence is more likely to survive archaeologically or later occupation evidence which may not retain archaeological

research potential. Some of this later occupation evidence may not satisfy the threshold for local heritage significance.

The HAIS prepared by GML Heritage is inconsistent in its assessment of archaeological significance, archaeological potential and conclusions regarding archaeological mitigation. However the conclusions that historical archaeological relics of local heritage significance are supported broadly by the Heritage Division. Avoidance of impacts to locally significant historical archaeological resources where possible in the design of the new structure is preferred in the first instance. However where that is not possible it is recommended that a suitable program of archaeological excavation and recording be undertaken prior to excavation preceding construction would be suitable to mitigate the loss of this locally significant information.

Based on the above, the following conditions to reduce the heritage impacts for this application:

Built and Landscape Heritage:

1. The Applicant should engage in early collaboration with North Sydney Council on mitigating impacts to the subject site and local heritage items in the vicinity, as well as built design, visual amenities and landscape treatment associated with the project.
2. The Applicant must consider better integration of sympathetic built and landscape design outcomes around areas of heritage significance. More sympathetic and less intrusive designs are to be explored for proposed new structures that better consider urban design and heritage outcomes.
3. The Applicant must undertake heritage interpretation across areas of works where heritage has been removed or impacted to assist the public in understanding the heritage impacted by this project.

Historical Archaeology:

4. An archaeological consultant shall be nominated for the works. The consultants shall have appropriate qualifications and experience commensurate with the scope of the Major Project works. The name and experience of these consultants shall be submitted to the Director-General for approval prior to commencement of works.
5. Prior to commencement of any ground disturbance works on site, an historical archaeological research design (HARD) and excavation methodology shall be prepared and submitted for approval of the Secretary of the Those documents should be prepared for the approval of the Director-General, Department of Planning & Infrastructure upon receipt of advice from the Heritage Division of the Office of Environment & Heritage. The HARD shall be prepared by a suitably qualified and experienced excavation director who fulfils the Heritage Council's Excavation Director Criteria for the excavation of locally significant archaeological sites.
6. The archaeological program of mitigation for impact to locally significance relics as assessed should be undertaken on site prior to and/or in conjunction with the proposed ground disturbance works in accordance with the approved historical archaeological research design and this activity should be undertaken by the nominated archaeological consultant.
7. After any archaeological works have been undertaken, a final excavation report(s) shall be prepared and lodged with the Heritage Council of NSW, the City of Sydney and the Department of Planning & Infrastructure. The proponent shall also be required to nominate a repository for the relics salvaged from any historical archaeological excavations.

8. The results of the archaeological fieldwork, the history of the site and other should be used to inform an Interpretation Plan to guide the future incorporation of the findings from the works in communicating the significance of the site to future visitors. The Interpretation Plan should be prepared in accordance with the Guidelines issued by the Heritage Council of NSW. The Interpretation Plan should be prepared for the approval of the Director- General, Department of Planning & Infrastructure upon receipt of advice from the Heritage Division of the Office of Environment & Heritage.

If you have any questions regarding the above matter please contact Ms Shikha Jhaldiyal, Heritage Officer, at the Heritage Division, Office of Environment and Heritage, on 9873 8545 or at shikha.jhaldiyal@environment.nsw.gov.au.

Yours sincerely



Katrina Stankowski
Senior Team Leader, Archaeology
Heritage Division
Office of Environment & Heritage
As Delegate of the NSW Heritage Council
30 August 2016