

David Way
Planner
Department of Planning Industry & Environment
GPO BOX 404, PARRAMATTA NSW 2124

By email: david.way@planning.nsw.gov.au

Dear Mr Way

Notice of Exhibition of application for New Liverpool Primary School (SSD-10391)

Thank you for your referral dated 30 June 2021 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal.

The proposed development involves:

- construction of a new primary school building and associated facilities
- landscaping and open space improvements
- removal of a dead tree
- school signage.

The following reports were considered in our assessment:

- *New Liverpool Primary School: Archaeological Assessment, Research Design and Excavation Methodology* (Comber Consultants, 2021)
- *New Liverpool Primary School: Environmental Impact Statement* (Ethos Urban, 2021).

As delegate of the Heritage Council of NSW, I provide the following comments on the *Archaeological Assessment*:

- The *Assessment* has been prepared by Comber Consultants in accordance with the issued SEARs and *Environmental Impact Statement* (EIS) requirements.
- The archaeological resource, associated with the three phases of site occupation identified, has been assessed as of low to medium (moderate) potential. Heritage NSW considers the assessment of archaeological potential suitable.
- The site is assessed as having potential for archaeology of local significance, which may contribute to understanding of the historical development of Liverpool. Heritage NSW concurs with the significance assessment.
- A combined archaeological program is proposed, involving monitoring of ground clearance and recording in areas of archaeological potential, and testing and salvage excavations targeting evidence of former occupation on site. Heritage NSW considers the archaeological program appropriate for managing the impact of the proposed development. It is noted that underfloor deposits, wells and cesspits would be recorded within grids and excavated in spits. It is suggested that the optimal approach to excavating and recording any historical archaeology is stratigraphically and per context. This method minimises the disruption of stratigraphic relationships, thereby simplifying analysis by avoiding the need to (potentially) equate the same archaeological contexts at the

interpretation stage. It is also recommended that all archaeological features encountered on site are subject to survey levels, reduced to Australian Height Datum (AHD).

- The two research questions provided to underpin the archaeological program focus on the presence/absence of evidence. The other research questions, to be addressed by historical research, may not (all) be adequately supported by the archaeology of the site. No comparative research questions are included, for example with other sites in Sydney that evidence the development of early nineteenth town allotments etc.
- Heritage NSW observes that an Excavation Director does not appear to have been nominated to manage the archaeological program. It is noted that, as an SSD project, the approval of an Excavation Director will be the responsibility of the Department, not the Heritage Council of NSW.

If you have any questions regarding the above advice, please contact Dr Hana Lewis, Senior Historical Archaeology Officer, at Heritage NSW on 9585 6323 or Hana.Lewis@environment.nsw.gov.au.

Yours sincerely

S Lavelle

5 July 2021

Dr Siobhan Lavelle OAM
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As Delegate of the Heritage Council of NSW