

Ms Megan Fu
Senior Planning Officer
Department of Planning, Infrastructure
& Environment, PARRAMATTA.
via email: megan.fu@planning.nsw.gov.au

Dear Ms Fu,

Notice of Exhibition of application for Liverpool Hospital Redevelopment, Elizabeth Street and Goulburn Street, Liverpool– SSD-10389

Thank you for your referral dated 25 May 2020 inviting comments from the Heritage Council of NSW on the *Environmental Impact Statement* (EIS) prepared for the above State Significant Development (SSD) proposal.

The proposed development involves the construction and operation of a new Integrated Services Building and refurbishment of existing buildings at Liverpool Hospital, including new basement facilities, utilities services, construction of new access roads and landscaping.

The following report was considered in our assessment:

- *Liverpool Health and Academic Precinct- Integrated Services Building and Refurbishment of the Clinical Services Building: Statement of Heritage Impact* (RPS, 2020).

As delegate of the Heritage Council of NSW, I provide the following comments on the archaeological heritage content of the report:

- *Assessments of archaeological potential and archaeological impact.*

The report references archaeological investigations undertaken in 1993 (Higginbotham) and 2009 (AHMS) that both uncovered historical phases of site occupation, with remains such as footings associated with the 1820s Moore Hall, a box drain, a ditch, postholes, deposits and post-1865 artefacts. Heritage NSW observes that both investigations were sampling programs involving test trenches, rather than larger-scale open area excavations, which is of note given the scope of archaeological evidence encountered during the works. Taking this evidence into consideration, the report assesses the archaeological potential of the site as low to moderate in Section 5.1 and low to nil in Sections 7.2.6 and 8.1, with high potential for historical drain/s to survive intact in localised, less disturbed areas of the site without basements. It is noted in the report that the sandstone capped box drain uncovered in the 2009 excavations is not depicted on Liverpool town plans. However, it is not made clear why other un/anticipated archaeological evidence may not survive *in situ*, as well as the drain/s, within less disturbed site areas.

Heritage NSW does not concur with the assessment of archaeological potential and observations of impact. It is reasoned that a diverse archaeological resource, dating to various historical phases and including unanticipated remains, has previously been discovered on site. Further, as mentioned in the report, it is noted that areas without basements on the site may be (reasonably) undisturbed and, it is argued, may therefore contain a range of archaeological evidence.

- *Assessment of archaeological significance.*

The significance assessment presented in the report (Section 6.6) only addresses potential 19th century drains on site, which are assessed as of Local significance for their association with the early town of Liverpool. In Sections 7.2.6 and 8.1, drains are considered to have the potential to be of Local or State significance, dependent upon the evidence and intactness. The significance assessment therefore appears unresolved. A significance assessment for the historical archaeological resource of the entire site (as a whole) has not been included.

Heritage NSW considers that the site significance assessment should have been expanded and refined. It is noted, for example, that the *Archaeological Assessment, "Moore Hall" site* (Wendy Thorp, 1993) concludes Moore Hall, which is located on the site, is of high cultural significance.

- *Archaeological recommendations.*

In Section 8.2, Recommendation 3 proposes that if any drains are encountered during the development, all works should cease in the area and an archaeologist be contacted to record the archaeology. Heritage NSW notes that this recommendation does not mention relics or any other archaeological evidence. Recommendation 4 proposes an Unexpected Finds Protocol, under Section 146 of the *Heritage Act 1977*. It is a statutory obligation for any person/s who believe they have discovered or located a relic to notify the Heritage Council. As such, Recommendation 4 is a mandatory lawful requirement in any circumstance. Primarily due to the historical occupation uncovered during previous archaeological investigations on site, Heritage NSW considers that the current recommendations are too limited in scope for necessary management of the potential quantum and character of archaeology on site.

Given the above, Heritage NSW considers that the report in its current form does not assess or support appropriate management of the potential archaeological resource on site. It is recommended that, at a minimum, an archaeological monitoring program (supervised by a suitably qualified historical archaeologist) is a more appropriate management strategy for the site. The archaeological program would need to be supported by an Archaeological Research Design (ARD), that includes an archaeological site assessment and an excavation methodology to guide the proposed works, produced by a suitably qualified historical archaeologist, who meets the Excavation Director Criteria of the Heritage Council of NSW.

If you have any questions regarding the above advice, please contact Dr Hana Lewis, Senior Historical Archaeologist, Specialist Services at Heritage NSW on (02) 9895 6521 or hana.lewis@environment.nsw.gov.au.

Yours sincerely



17 June 2020

Dr Siobhan Lavelle, OAM

Senior Team Leader, Specialist Services

Heritage NSW, Department of Premier and Cabinet

As Delegate of the Heritage Council of NSW