



Our ref no: DOC19/740889
Your ref no: SSD 10339

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

By email: David.Gibson@planning.nsw.gov.au; Megan.Fu@planning.nsw.gov.au

Dear Mr Gibson

RE: Notice of Exhibition – SSD Additional to approved Acute Services Building for Health Research Use (SSD 10339 at Prince of Wales Hospital Campus (Part Lots 4-11 DP 13995 and Part Lot 1 DP 870720, Hospital Road, Randwick (Randwick LGA))

I refer to your letter dated 23 August 2019 inviting comments from the Heritage Council of NSW and advice on recommended conditions for the above State Significant Development application for the Additional to the Acute Services Building at the Prince of Wales Hospital. The proposed development involves:

- Construction of a 10-storey addition to the eastern elevation of the approved Acute Services Building (ASB) with a gross floor area of c5000m² for use by UNSW,
- Modification to the ASB,
- Lowering of Hospital Road, and
- Landscaping works.

While the site does not include any items listed on State Heritage Register (SHR), the Prince of Wales Complex (Avoca Street, Randwick) has been nominated for listing under s31(2) of the Heritage Act 1977 as a potential item of State significance. *Heritage Act 1977* approval under s139 to manage disturbance of relics was sought and approval for early works related to the ASB under application 2018/s140/035. The current application has included assessment in the following documents which were reviewed for the SSD referral:

- *Appendix M: Heritage Impact Statement SSD 10339 Randwick Campus Redevelopment – Integrated Acute Services Building Addition prepared by Advisian Pty Ltd dated 10 July 2019;*
- *Appendix N: Randwick Campus Redevelopment Historical Archaeological Assessment and Statement of Heritage Impact prepared by Casey and Lowe dated July 2019*
- *EIS SSD 10339 Prince of Wales Hospital – Addition to Approved Acute Services building prepared by Advisian Pty Ltd for Health Infrastructure NSW dated 20 August 2019.*

In reviewing the application, the following comments have been prepared relevant to potential affect to an item nominated for SHR listing (which remains under assessment) and to historical archaeology:

The SEARS provided clear advice on the presence of a nomination under assessment for the Prince of Wales Complex on Avoca Street, Randwick. This item includes the Main block

(Edmund Blacket Building and courtyard), the Catherine Hayes Hospital and Superintendent's Residence (I388 in the LEP). The SOHI is silent on the items located off Avoca street linked to the Catherine Hayes and Superintendent's Residence (relevant to the SHR nomination). Given the proximity of the proposed addition which is located at the very western extent of the Hospital site, and the presence of existing buildings between the new structure and the nominated buildings, it is unlikely the addition would visually affect the nominated item any more than the existing buildings already do.

The EIS has considered the previous historical occupation which is documented for the study area and its likelihood to retain archaeological relics requiring management. The site is close to the former Randwick Destitute Children's Asylum, Cemetery and other associated buildings. However, none of these structures or associated out-buildings are known to exist within the study area. The Assessment prepared by Casey and Lowe has identified the presence of a series of WWII air raid slit trenches were established in the site. It is argued that these may contain backfilled material which could have research potential for artefacts linked to the Asylum (1857), associated Receiving House (1878) and Military Hospital (1912/1918) phases.

There is no evidence to explain how backfilled material from the earlier phases would be likely to be present in the slit trenches which would have been backfilled following the end of WWII. There is also no link in the proposed research design to explain how the archaeological investigation of the slit trenches would provide evidence of this nature and how this would provide new information not currently available from other (historical documentary and oral) sources.

The Archaeological Assessment prepared by Casey and Lowe has not demonstrated there are archaeological 'relics' with research potential within the meaning of the *Heritage Act 1977* and the Heritage Council's current guidelines. An archaeological program is not recommended for this SSDA and no conditions of consent are included with this letter. The project can be adequately managed through an unexpected finds procedure within the remit of a Construction Environmental Management Plan (CEMP).

If you have any questions regarding the above matter please contact Felicity Barry, Senior Historical Archaeologist at Heritage, Department of Premier and Cabinet on (02) 9995 6914 or at Felicity.Barry@environment.nsw.gov.au

Yours sincerely



30 September 2019

Dr Siobhan Lavelle OAM
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Heritage, Community Engagement,
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As Delegate of the NSW Heritage Council