



Illawarra International Health Precinct
 Dr. B. R. Gooley
 La Vie Developments Pty Ltd
 PO Box 323
 KINGSGROVE NSW 2208

15 August 2009

Dear Dr. Gooley,

Thank you for forwarding comments from the Department of Environment, Climate Change and Water NSW, dated the 10 August 2009. This correspondence specifically identified concerns regarding the Impacts on Aboriginal Cultural Heritage Values.

Following internal review processes, the Biosis Research report has been revised and re-issued to address the concerns raised by DECCW. Please forward the revised report to DoP and DECCW. I can be contacted directly if further clarification is required.

Issues have addressed as outlined below:

DECCW Comments	Biosis Research Response / Action
<p>Consultation with the Aboriginal Community</p> <p>The DECCW notes that the Illawarra Local Aboriginal Land Council was the only stakeholder group invited to participate in the archaeological survey, assessment and consultation process on the basis of advice from DECCW. Evidence of this advice should be appended to the Biosis report as well as an explanation as to why no further efforts were made to identify and/or consult with other Aboriginal stakeholders in the area.</p> <p>It remains unclear as to whether the likely impact of the proposed development on the study area has been adequately explained to Aboriginal stakeholders. The Standard of Cultural Significance states that 'the importance of preserving the remnant natural environment within the</p>	<p>No specific advice in writing was received from DECCW in regards to consultation. Notifications sent to DECCW have received no written response.</p> <p>Advice from DECCW (Wollongong) to proponents has been to involve Land Council only.</p> <p>The Illawarra Local Aboriginal Land Council is considered to be the primary knowledge holders for the Study Area.</p> <p>The proponent has identified the value in determining the cultural values of the study area and has subsequently undertaken additional consultation. This is outlined in Section 1.3 of the Biosis Research report. A consultation log and consultation correspondence can be found in Appendix 1 and 2 of the report.</p> <p>One additional Aboriginal groups responded to Notifications or Local Print Media Advertisements – this group were consulted and completed a site assessment of the study area. No Written comments have been received.</p> <p>Clarification from the ILALC and Kullila has also been sought on the specific Cultural Values within the Study Area.</p> <p>The 'Concept Plan' booklet provided by La Vie Developments was provided to Sharralyn Robinson, Illawarra Local Aboriginal Land Council and Maria Maher from Kullila.</p> <p>The proposed impacts were also discussed at length with Roy Stewart on-site during the field survey. Biosis Research and the</p>

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<p>Study area was also stressed by each of the groups', however according to the Biosis report provided, there is no remnant natural environment and only one stakeholder group was consulted.</p> <p>The Biosis report states that no further archaeological work is required, however, also recommends that a representative of the Illawarra Local Aboriginal Land Council be present on site during the initial scraping of the topsoil. The DECCW notes that this recommendation could be interpreted as contradictory. If there is no likelihood of cultural material being present, there should be no need to monitor earth disturbance works on the subject site. If indeed there is a likelihood that cultural material remains on the subject site, then a programme of testing should take place to identify the nature and extent of the sub-surface deposits.</p>	<p>ILALC both agreed that no further investigation would be required – however, the ILALC requested that they monitoring stripping of the top of the rise.</p> <p>The comment regarding the importance of preserving the natural environment is part of our template and should have been removed and the appropriate comments, if any, added to this section. This is an oversight.</p> <p>The specific recommendation regarding monitoring has been removed as this is not a Biosis Research recommendation. Rather, a note has been added that the proponent should consider all requests make by registered stakeholders – as the ILALC written comments states their request for monitoring on the property.</p> <p>The rise on the property was identified as being of low archaeological sensitivity based on previous site prediction modeling, however, coupled with ground disturbances (now identified clearly on Figure 4), it was deemed that additional investigations would not yield significant archaeological information.</p> <p>There is a lack of detail regarding this in the Biosis Research report has been revised and added.</p> <p>Additional discussions with the ILALC will also be undertaken to ensure that they fully understand the proposed development impacts. If they have additional comments or recommendations these will be added to the Biosis Research report.</p>
<p>Survey Methods</p> <p>An explanation is required about the reasons for using a targeted survey methodology rather than a comprehensive survey of the study area. Furthermore, detail should be provided as to why the survey transects were used and how this may have affected the survey results.</p>	<p>A comprehensive survey of mostly steep slope paddock with thick grass cover was not considered the appropriate method of archaeological survey at the time. Areas of exposure were encountered across the top of the hill, along the fence lines, beneath the power lines and around the stock yards. Most of this is a result of horse movement.</p> <p>The steep, grassed slopes of the rise were not considered to be of high archaeological potential – based primarily on previous archaeological modeling throughout this area (AMBS 2006). Excavations were undertaken on Mullet Creek on the adjacent property, at the bottom edge of the rise – on alluvial terraces.</p> <p>Only 3-4 paper barks trees remain on the property – none of which contained cultural scarring.</p> <p>The property is relatively small and once on the top of the rise all areas of GSV or potential could be clearly identified and targeted.</p> <p>The rise situated within the Study Area was identified as an area of 'low archaeological sensitivity' as this is consistent with the predictive modeling for the area.</p>
<p>Survey Effectiveness</p> <p>Landscape elements that contribute to survey effectiveness, such as ground surface visibility and disturbance in the subject area have not been mapped.</p>	<p>GSV was generally low across much of the property. Where GSV was high – no cultural material was identified – including large exposed sections within the area of 'low archaeological sensitivity'.</p>

<p>Whilst an explanation of these landscape elements has been provided, these elements have not been discussed in relation to the effectiveness of survey. Detailed descriptions of the disturbances to the study area should be included, as well as a description of how these disturbances may have impacted on potential subsurface deposits. On the basis of the information provided, it would appear that there is limited sub-surface disturbance and where it does occur as a result of infrastructure development, it is likely to be localized rather than extensive sub-surface disturbances.</p> <p>According to Figure 4 of the Biosis report, as area of archaeological sensitivity has been identified, however no mitigation measure have been proposed for this area, with previous land-use and infrastructure development sighted as a justification. The DECCW notes that his statement may be interpreted as contradictory. As no detailed descriptions of the disturbances to the study area have been provided, it remains unclear as to how land-use and infrastructure development have affected archaeological sensitivity in the area.</p>	<p>Considering the nature of the slope across most of the small study area, the survey effectiveness is considered adequate.</p> <p>Further detail regarding the GSV and areas of exposure and disturbance across the Study Area will be identified on mapping and within the Results section of the Biosis Research report.</p> <p>Areas of disturbance and exposure will be indicated on Figure 3. The descriptions of disturbances within the Biosis Research report are poor and limited – these will be revised and elaborated.</p>
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If you have any further queries regarding the assessment, please don't hesitate to contact me in the Wollongong office on 4229 5222.

Kind Regards,



Melanie Thomson
Wollongong Resource Group Manager