

Emily Dickson  
Department of Planning, Industry and Environment  
Principal Planning Officer  
4 Parramatta Square, 12 Darcy Street,  
PARRAMATTA NSW 2150

By email: [Emily.Dickson@planning.nsw.gov.au](mailto:Emily.Dickson@planning.nsw.gov.au)

Dear Ms Dickson

**Request for Secretary's Environmental Assessment Requirements (SEARS) for Eastern Creek retail outlet centre (SSD 10457)**

Thank you for your referral dated 4 May 2020 inviting SEARS input from the Heritage Council of NSW on the above State Significant Development (SSD) proposal. It is noted that draft heritage SEARs have already been drafted:

1. *Heritage*  
*Where relevant, a Heritage Impact Statement should be prepared and an assessment of the impact on heritage significance of any heritage item/s and/or conservation areas should be undertaken in accordance with the guidelines in the NSW Heritage Manual.*
2. *Archaeological Impacts*  
*If relevant, an archaeological study is to be carried out on site to identify any European and/or Aboriginal archaeological impacts associated with the proposal.*

The proposed SSD site is in the vicinity of State Heritage Register Archaeological items, The Rooty Hill (SHR no. 01756), Government Depot Site former) (SHR no. 00345), and Bungaribee Homestead Complex - Archaeological Site (SHR no. 01428).

While it may be argued by the Proponent that visual impacts are unlikely to an archaeological site, Heritage NSW notes that the context of an archaeological site directly contributes to its understanding in the landscape.

For example, Bungaribee's positioning in the landscape has a continuing and clear visual relationship with the Blue Mountains to the west. The re-development of the Bungaribee Homestead complex Archaeological site by Landcom aimed to reduce heights in proximity to the site to retain this important view corridor. HNSW recommends that the height of the current proposal in relation to Bungaribee, particularly the key view corridor is analysed with advice on its management in the EIS documents.

Heritage NSW understands that this application is for a concept approval for the staged development of the Eastern Creek Retail Outlet Centre. As such, it is appropriate for the SEARS and the EIS to include appropriate detailed analysis to understand the full impact of the concept development on neighboring State significant heritage values. The information requested in the Heritage SEARs is also included to clarify whether the site may retain State significant historical archaeological values associated with the neighbouring SHR sites, which would require a modified detailed design to retain, rather than remove, these elements.

It is therefore recommended that the draft heritage SEARs are revised as outlined below:

Heritage and archaeology

- a) A Statement of Heritage Impact (SOHI) prepared by a suitably qualified heritage consultant in accordance with the guidelines in the NSW Heritage Manual. The SOHI is to address the impacts of the proposal on the heritage significance and the listed values of the site, and adjacent areas and is to identify the following:
- all heritage items (state and local) within the vicinity of the site including built heritage, landscapes and archaeology, detailed mapping of these items, and assessment of why the items and site(s) are of heritage significance;
  - compliance with the relevant Conservation Management Plan;
  - the impacts of the proposal on heritage item(s) including visual impacts, significant site lines and viewsheds from and to the sites, required BCA and DDA works, any modified services;
  - including analysis of appropriate height limitations to protect view corridors to the Blue Mountains from the surrounding SHR sites, which have values linked to their significant views;
  - the attempts to avoid and/or mitigate the impact on the heritage significance or cultural heritage values of the site and the surrounding heritage items; and
- b) An historical archaeological assessment should be prepared by a suitably qualified and experienced Historical archaeologist in accordance with the guidelines *Archaeological Assessment* (1996) and *Assessing Significance for Historical Archaeological Sites and Relics* (2009). This assessment should identify what relics, if any, are likely to be present, with analysis to address potential in the study area which may be associated with the former Rooty Hill Depot and stock farm (both SHR listed). The Assessment shall assess their significance, potential resource, and consider the impacts from the proposal on this potential archaeological resource. Where impact is likely to occur, the assessment shall include recommendations to manage the significance. Test excavation may be necessary and appropriate to inform the EIS for the concept proposal. The Assessment and EIS shall address what impact are anticipated to the resource and what options and commitments may be possible at detailed design stage to avoid in whole or part the archaeological resource including archaeological mitigation if appropriate.

As the site contains a local heritage item, and other local items are in the vicinity, advice should be sought from the relevant local council.

If you have any questions regarding the above advice, please contact Tim Olliver, Senior Heritage Assessment Officer at Heritage NSW on (02) 4927 3203 or [Timothy.Olliver@environment.nsw.gov.au](mailto:Timothy.Olliver@environment.nsw.gov.au).

Yours sincerely



13/05/2020

**Katrina Stankowski**

Senior Team Leader, North Assessments

Heritage NSW

Department of Premier and Cabinet

**As Delegate of the Heritage Council of NSW**