

Suzannah Byers
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By email: suzannah.byers@dpie.nsw.gov.au

Dear Ms Byers

**HERITAGE NSW – ABORIGINAL CULTURAL HERITAGE ASSESSMENTS
STATE SIGNIFICANT DEVELOPMENT (SSD)
EXHIBITION OF ENVIRONMENTAL IMPACT STATEMENT**

Proposal: GQ Parramatta
SSD application no: SSD-35609161, received 1 August 2022

Thank you for referring the Environmental Impact Statement (EIS) for the above State Significant Development (SSD) to Heritage NSW for comment. We understand this SSD relates to the proposed redevelopment of 12 Hassall Street, Parramatta (the project). It is proposed to demolish existing buildings on the site and construct a 61-storey mixed use commercial and residential tower with basement parking.

In preparing the below advice, we have reviewed the following documents that were available on the Department of Planning and Environment Major Projects Portal:

- SEARs for SSD-35609161, issued 28 January 2022.
- Environmental Impact Statement: Built-To-Rent Housing – 12 Hassall Street Parramatta, prepared by Think Planners, dated 12 July 2022.
- 12 Hassall Street, Parramatta: Aboriginal Archaeological Assessment, Version C.2022, prepared by Comber Consultants, dated 22 April 2022.

We have also reviewed the following document, which was provided to Heritage NSW by the heritage consultant for the project on 15 August 2022:

- 12 Hassall Street, Parramatta: Aboriginal Cultural Heritage Assessment Report, C.2022, prepared by Comber Consultants, dated 12 July 2022.

Review of EIS and associated reports

We note that the SEARs require an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with the relevant guidelines, identifying, describing and assessing any impacts for any Aboriginal cultural heritage (ACH) values on the site.

The ACHAR provided identifies that the subject land has the potential to contain subsurface Aboriginal archaeological deposits. It has further been assessed that such deposits are highly likely to contain contact archaeology, and possibly evidence of occupation during the period of the “Native Conferences.” As such, there is potential for highly significant ACH to be present.

We note that no archaeological test excavations have been conducted, which means that the ACH values on the site have not been identified. Further, the impacts on any ACH values through the proposed development have not been assessed. We therefore consider that the ACHAR in its current form does not adequately address the SEARs.

We acknowledge the constraints to testing currently posed by the site, which is occupied by buildings and paved surfaces that have not yet been demolished. We also understand that the proposed development will maximise all space within the development envelope and includes a basement, so it will not be possible to avoid impact.

We therefore agree with the ACHAR recommendation that test and [potentially] salvage excavation should be undertaken. However, please note that our usual requirement is that any test excavations are completed upfront at the EIS stage in order to inform the proposed development and the preparation of appropriate management and mitigation measures, commensurate with the assessed significance of any ACH present.

The ACHAR includes a proposed Aboriginal archaeological excavation methodology, which we consider to be appropriate for the site. It is proposed to commence excavations once the existing buildings have been demolished, the slab has been removed (while monitored), and some historical archaeological investigations have been undertaken.

The methodology comprises two stages. The first involves dispersed 1m x 1m test pits excavated on a grid across the site. The second involves excavation expansion based on the identification of one or more specific triggers within the initial test pits. The proposed methodology is standard for Parramatta and should enable direct comparison with the results of other Aboriginal archaeological excavations conducted in the local area. The methodology should also ensure the maximum amount of archaeological information is gained from the site, providing some mitigation of harm through conservation by record of the ACH present.

We support the proposal to use information gained from the archaeological excavations to inform any heritage interpretation or cultural design elements that are to be incorporated into the proposed development.

We note that consultation for the ACHAR has been undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. The draft ACHAR and proposed excavation methodology were provided to all registered Aboriginal parties (RAPs) for review. Several RAPs have indicated support for the proposal and methodology, and no objections from any RAPs have been recorded.

Advice on EIS

- We support the proposed Aboriginal archaeological excavation methodology as presented in the ACHAR.
- We recommend that the Aboriginal archaeological excavation report includes the following information, in accordance with current Heritage NSW requirements for reporting on test and salvage excavations in Parramatta:
 - Detail of the results of any analysis of Aboriginal objects;
 - Analysis of the geomorphological context and site formation processes in relation to the results of the excavation and analysis of Aboriginal objects;
 - Analysis of the local and regional context in relation to the results of the excavation and analysis of Aboriginal objects. Attempts should be made to obtain and incorporate the reports, or summaries of results, of Aboriginal archaeological excavations recently undertaken at sites in Parramatta;
 - A predictive model and avenues for future research and desirable conservation outcomes for the region based on the results of the excavations and other work that has been completed in the region;
 - Detail of the results of the analysis of Aboriginal objects and samples taken in relation to the research questions formulated prior to the excavation;
 - Discussion of the presence or absence of contact archaeology. This should include a discussion of how the evidence presents in the archaeological record

and how future research designs may be formulated to capture this evidence. If no archaeological evidence of contact is uncovered, consideration of the reasons for this should be presented;

- All relevant excavation records included as appendices, including a plan of the location of all trenches excavated;
 - Description of any ongoing consultation with, or involvement of, representatives of the RAPs in relation to this project;
 - If any Aboriginal objects were moved to a temporary storage location, a description of the nature and types of Aboriginal objects which are now at that location;
 - Detail of the long-term management arrangements for any Aboriginal objects; and
 - A statement confirming that all Aboriginal Site Impact Recording Forms have been completed and submitted to the AHIMS Registrar.
- We support the recommendation for an Aboriginal heritage induction to be provided to all employees and contractors engaged on the project. We consider that any Aboriginal cultural heritage awareness inductions would benefit from the involvement of Aboriginal community representatives.
 - Protocols for the discovery of human remains and unexpected Aboriginal objects should be included as part of any Construction Environmental Management Plan prepared for the development works.
 - Any heritage interpretation strategy and plan should be developed in consultation with the registered Aboriginal parties.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. You may wish to seek separate advice from Heritage NSW in relation to matters under the *Heritage Act 1977*.

If you have any questions regarding the above advice, please contact Sam Gibbins at Heritage NSW on 9895 6586 or via email at samantha.gibbins@environment.nsw.gov.au.

Yours sincerely



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Heritage NSW
Department of Planning and Environment
22 August 2022