



Our ref: DOC22/986565
Your ref: SSI-10035

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Dear Mr. Ng

**Advice on Environmental Impact Assessment (EIS) - State Significant Infrastructure (SSI) -
Parramatta Light Rail Stage 2 (SSI-10035) (City of Parramatta)**

Thank you for your referral uploaded to the Major Projects Portal on 9 November 2022, seeking advice on the above State Significance Infrastructure (SSI) proposal, with respect to Aboriginal cultural heritage. In preparing this advice Heritage NSW has reviewed the following documents:

- **Chapter 11** - *Aboriginal Heritage, Parramatta Light Rail Stage 2, Environmental Impact Assessment (EIS) - Transport for NSW.*
- **Technical Paper 4** - *Preliminary Aboriginal Cultural Heritage Assessment Report, Parramatta Light Rail Stage 2, Transport for NSW - RPS - 28 October 2022.*

Heritage NSW advised Transport for NSW (12 May 2022), and subsequently the consistency review of the EIS (16 September 2022), that the Preliminary Aboriginal Cultural Heritage Assessment Report (ACHAR) does not include adequate information on impacts to Aboriginal cultural heritage values, archaeological sites/areas of potential archaeological deposit (PAD), and the community consultation process is incomplete. As referenced in the Preliminary ACHAR, there are significant gaps in the information that is required to complete the ACHAR, including:

- Cultural values assessment (to be completed in consultation with the registered Aboriginal parties).
- Results of the archaeological testing program excavations conducted within areas of archaeological potential.
- Significance assessment for sites/areas of archaeological potential within the study area.
- Evaluation of actual and likely harm to Aboriginal objects from the project.
- Provision of detailed and specific management and mitigation recommendations (including any associated methodologies for implementation).

As acknowledged in the preliminary ACHAR, the finalisation of the ACHAR is contingent on the completion of archaeological test excavations, which Heritage NSW understands are currently being completed.

To satisfy the SEARs for the project Heritage NSW requires that a finalised ACHAR must be submitted, informed by the completion of the cultural values assessment, archaeological test



excavation program, assessment of significance, evaluation of actual and likely harm, and the provision of final detailed management and mitigation recommendations (including methodologies for implementation of salvage programs, as required). The final ACHAR must incorporate the outcomes of consultation with the registered Aboriginal parties, including documenting and addressing any comments received on the draft ACHAR.

Opportunities to improve the ACHAR

Heritage NSW has reviewed the Preliminary ACHAR and noted some additional opportunities for the ACHAR to be clarified to better inform the proposal.

- The project description and impact assessment sections do not provide any detailed information on the depth of proposed subsurface impacts. Within the portion of the project site boundary located with the Parramatta Sand Body, understanding the likely depth of subsurface impacts is critical to better understanding the likelihood of harm to potentially highly significant deposits associated with the sand body.
- The SEARs referenced in Table 1.1 do not directly correlate with the SEARs as issued. This should be addressed in the final ACHAR.
- The project site boundary should be added to Figures 7.1-7.5 to clearly show the relationship between the survey units, study area and project site boundary.
- It is understood that access was not available during the survey to the area comprising private properties adjacent to Wharf Road, which is shown in Figure 7.7 as an area of archaeological sensitivity. While it is understood that further investigations in this area are contingent on confirmation of project impacts within the residential area, mitigation and management recommendations should be provided for the area to be implemented should impacts be required.
- It is understood that the survey targeted areas considered to have archaeological sensitivity. However, no clear reasoning is provided regarding the archaeological potential of the non-surveyed areas (including explanation of factors that influence this level of potential) and the likelihood of harm from the proposed works in the non-surveyed areas. This needs to be completed to demonstrate that these areas have been adequately considered.
- Section 9 references potential impacts to AHIMS 45-6-2978 in the form of 'social impacts' due to the proximity of the works to the predicted location of the Parramatta Native Institute. This is not mentioned elsewhere in text. The term 'social impacts' needs to be explained and, if this constitutes a project impact, should be discussed with reference to associated mitigation and management measures.
- Section 10 identifies that test excavation will not be conducted where the project site interacts with sites AHIMS 45-6-2977 and 45-6-4015 as it is within the active road corridor, noting that test excavations would result in significant disruptions. While Heritage NSW would prefer that test excavations are completed to inform the ACHAR, it is understood that this is not practical at this location. It is noted that the ACHAR includes a review of outcomes of subsurface investigations in the surrounding area and provides a reasonable characterisation of archaeological expectations should project intersect the Parramatta Sand Body. On this basis, Heritage NSW recommends that the final ACHAR include a detailed methodology for test excavations and subsequent



salvage excavations at this location (if required), including the proposed management strategies, should contact period objects/relics be identified during works.

- Section 10 indicates that, where test excavation indicates that a site is disturbed with no archaeological values, no salvage will be required. This statement does not include any consideration of cultural value and should be revisited in finalising the ACHAR.

Commentary on Archaeological Test Excavation Methodology

Heritage NSW notes that comments regarding the archaeological test excavation methodology were provided in our previous advice dated 16 September 2022 (DOC22/827698-1). These comments have not been repeated, however, it is expected that these have been taken into consideration in the current test excavation program.

If you have any questions regarding the above advice, please contact Nicola Roche, Senior Assessments Officer at Heritage NSW, on 9228 6424 or nicola.roche@environment.nsw.gov.au

Yours sincerely

Nicole Davis

Manager Assessments

Heritage NSW

Department of Planning and Environment

(As Delegate under *National Parks and Wildlife Act 1974*)

24 November 2022