

Our ref: DOC24/629325

Sally Munk

Principal Planning Officer

Department of Planning, Housing and Infrastructure

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Letter uploaded to the Major Projects Planning Portal

Advice on Environmental Impact Statement – State Significant Development

Proposal: Waste Management Facility, Botany

Major Project reference: SSD-62855708

Received: 2 August 2024

Dear Sally

Thank you for your referral seeking advice on the above State Significant Development proposal. In preparing this advice Heritage NSW has reviewed the following documents:

- Relevant sections of the Environmental Impact Assessment: Coombes Property Group & KLF Group – Waste Management Facility, Botany – prepared by EME Advisory, dated July 2024.
- Appendix P: Aboriginal Cultural Heritage Assessment Report – C&D Facility, 2-4 Hale Street, Botany – prepared by Artefact Heritage, dated April 2024.

The Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared with reference to the relevant guidelines as required by the Secretary's Environmental Assessment Requirements. Based on the outcomes of the ACHAR a Potential Archaeological Deposit (PAD) has been identified across the entirety of the Subject Area, consisting of buried natural sands as identified by geotechnical investigations. As '2-4 Hale Street PAD 01' has unknown significance and has the potential to be partially directly impacted by the construction of the facility, particularly during the proposed underground storage tank remediation works, the ACHAR states that further archaeological investigation is required. Due to the presence of the extant structures and hardstand, however, it is not possible to undertake archaeological excavation at this stage, and it is therefore recommended that such investigations be undertaken under an Aboriginal cultural heritage management plan. Heritage NSW provisionally supports the proposed Mitigation Measures and Recommendations (Sections 7 and 8 of the ACHAR), however, the following updates and/or clarifications as outlined below are required.

- Please confirm that '2-4 Hale Street PAD 01' has been registered on the Aboriginal Heritage Information Management System based on the results of this assessment.
- To evaluate whether the proposed investigation program is adequate to mitigate the predicted impacts of the project, Heritage NSW require that the detailed Archaeological Research Design and Excavation Methodology (with detailed plans showing proposed excavation locations) be provided as a component of the ACHAR. As a minimum, this would need to include the methodology for test excavations, specification of the triggers for when test excavations would be undertaken, proposed triggers for where salvage excavation would be required, and a proposed approach should subsurface deposits be of a level of significance that necessitates a conservation outcome. This methodology must be developed in consultation with Registered Aboriginal Parties.

If you have any questions regarding these comments, please contact Marika Low, Senior Assessments Officer, at Heritage NSW on 9873 8500 or heritagemailbox@environment.nsw.gov.au.

Yours sincerely

Nicole Davis

Nicole Davis
Manager Assessments
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
3 September 2024