

Our ref: HMS ID 7874

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Letter uploaded to the Major Projects Planning Portal

Advice on Environmental Impact Statement – State Significant Development

Proposal: Burrah Park

Major Project reference: SSD-70316465

Received: 12 November 2024

Dear David,

Thank you for your referral seeking advice on the above State Significant Development proposal. Heritage NSW understands the project involves development of Burrah Park, comprising Stage 1 including construction of three warehouses and associated works, and concept plan for future development.

In preparing this advice, Heritage NSW has reviewed the following documents:

- Relevant sections of the Environmental Impact Statement - prepared by Urbis, dated 1 November 2024
- Appendix Z: Aboriginal Cultural Heritage Assessment Report Burrah Park Industrial Development 1953-2109 Elizabeth Drive, Badgerys Creek, Volume 1 of 2- prepared by Baker Archaeology, dated 26 September 2024
- Appendix YY: Aboriginal Cultural Heritage Assessment Report Burrah Park Industrial Development 1953-2109 Elizabeth Drive, Badgerys Creek, Volume 2 of 2- prepared by Baker Archaeology, dated 26 September 2024

Following the review of the above documents, Heritage requests additional information to inform its advice to the Department on whether the Aboriginal Cultural Heritage Assessment Report (ACHAR) adequately addresses the Secretary's Environmental Assessment Requirements (SEARs) for the project, including the associated recommendations for the management of Aboriginal cultural heritage. We have included detailed advice in relation to recommended revisions of the ACHAR in

Attachment A. Heritage NSW may have additional comments and queries following the response to those items in Attachment A.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact Jules McLachlan, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Corey O'Driscoll

Corey O'Driscoll
A/Practice Lead
Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
12 December 2024

Attachment A - Detailed Aboriginal cultural heritage advice

Presentation

1. It is noted that many of the figures provided in the ACHAR and the Archaeological Assessment Report (AAR) are not legible. Please ensure all figures, maps and images are clearly presented. Following revision of the mapping, Heritage NSW may have additional comments on the test excavation results and proposed management and mitigation measures on these sites identified during testing.

AHIMS

2. Please update the ACHAR and AAR to include the Aboriginal Heritage Information Management System (AHIMS) Site ID for each registered Aboriginal site.

Consultation

3. Please provide all consultation documentation from Stage 1 to Stage 4 as per the *Aboriginal cultural heritage consultation requirements for proponents 2010*, including both outgoing and incoming emails and/or postal notifications for each stage. Please ensure that earlier phases of the consultation (i.e., 2020 consultation) is included.
4. Under Heritage NSW's policy and guidelines, breaks in consultation of over six months may not constitute continuous consultation. In future, please ensure consultation is maintained at 6 monthly intervals with all Registered Aboriginal Parties.

Archaeological Assessment

5. The ACHAR includes the sampling strategy and methodology utilised for the 2021 test excavation program. Please include the sampling strategy and methodology implemented for the 2023 test excavation program.
6. Please include a detailed discussion on the Aboriginal waterhole, including additional photos and its significance in relation to artefact densities associated with AHIMS 45-5-5642 (CCE SW).
7. Section 2.2.3 of the ACHAR notes that test excavation along Oaky and Cosgroves creeks did not identify alluvial stratigraphy typically associated with the South Creek soil landscape. Please include a detailed discussion on the soil profiles encountered during the test excavation program, including comment on their integrity and implication for the archaeological resource. This should be supplemented by reference to scaled images.

Impact Assessment

8. Please include an impact assessment table summarising the proposed impact for each AHIMS site as per the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010)*.
9. Please provide a map showing the AHIMS site extents in relation to the proposed works footprint.

Management and Mitigation Measures

10. Noting that a full salvage excavation methodology will be developed for the Aboriginal Heritage Management Plan, please provide some information on the proposed salvage

excavations including mapping showing indicative salvage locations, estimated excavation area, and details of the methods that will be implemented. Further, please include provisions for avoidance and/or conservation of these sites proposed for salvage excavation if greater than expected density and/or rare archaeological materials are identified that may increase the significance of the site.

11. Please provide further explication on the attempts to minimise and/or avoid impacts to the three sites identified for the subsurface salvage excavations.