

Our ref: HMS ID 10132

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Advice on Environmental Impact Statement – State Significant Development

Proposal: UNSW G25 Education Building

Major Project reference: SSD-74670005

Received: 22 April 2025

Dear Megan,

Thank you for your referral seeking advice on the above State Significant Development proposal. It is understood that the applicant is seeking approval for the construction and operation of a teaching and learning facility at the G25 site including demolition of the existing at-grade car park, construction of a multi-storey building with basement and associated landscaping, parking and public domain works.

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

- Relevant sections of the Environmental Impact Statement: UNSW G25 Education Building – prepared by Ethos Urban Pty Ltd, dated 6 March 2025
- Appendix Z: Aboriginal Cultural Heritage Assessment - G25 Education Building UNSW Kensington Campus Kensington NSW – prepared by Urbis Ltd, dated 11 December 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 (SEARs). The ACHAR outlines that while there are no known Aboriginal objects sites within the Subject Area, a review of the geotechnical assessment indicates the presence of natural sands of 0.2 to 1.1m thick below fill at depth of about 1.0 to 1.6 m. Based on the environmental and archaeological review, the Aboriginal archaeological potential of the Subject Area is therefore assessed to be high across most of the Subject Area where intact natural sandy soils have been identified, but very low in the highly disturbed area on the western boundary. The proposed works require ground disturbance to depths exceeding the known depth of the surface fill layer and will be undertaken in areas where

residual natural soils are known to occur. The proposed works therefore are assessed as having the potential to cause direct harm to Aboriginal objects should they be present within the natural sandy profiles.

The ACHAR recommends that additional archaeological investigation in the form of test excavations be completed to investigate the nature, spatial and stratigraphical extent, condition, integrity and significance of Aboriginal archaeological resources. To avoid unnecessary harm to Aboriginal objects and disruption of UNSW operations, however, the ACHAR recommends that the test excavations be completed post-approval but prior to construction. An Archaeological Research Design and Excavation Methodology is provided in Section 7 of the report. Heritage NSW agrees with the management recommendations and mitigation measures (Sections 8 and 9 of the ACHAR). Heritage NSW recommends that Planning provide the following comments to the Proponent which may be addressed when developing the draft Aboriginal Cultural Heritage Management Plan (ACHMP), if approved:

1. As per Section 89A of the *National Parks and Wildlife Act 1974*, please ensure that all sites, including untested areas of Potential Archaeological Deposit (PAD), have been registered with the Aboriginal Heritage Information Management System (AHIMS).
2. When incorporating the Research Design and Excavation Methodology provided in Section 7 into any future ACHMP, please address the following:
 - a. Heritage NSW recommends updating the research questions in Section 7.2 to include a question relating to chronology/age of any Aboriginal archaeological deposits where encountered.
 - b. We note that the presence of sand within the fill layers may present challenges to identifying the transition between fill and natural profiles. To address this, please amend the methodology in Section 7.3.2.3 (Stage 1 Archaeological Monitoring) to provide clarification on whether any removed fill will be sieved and provide an explanation for how it will be determined that natural soils have been identified (e.g. will a geomorphologist be involved? Are there specific criteria/characteristics that can assist with the identification of natural soils).
 - c. Please provide justification for the initial use of mechanical excavation to test the natural deposits following removal of the concrete slab and imported fill (i.e. Section 7.3.2.4 - Stage 2 Mechanical Excavation). Where natural soils are encountered, Heritage NSW recommends that sediments be excavated manually using hand tools consistent with Requirement 16a(3) of the *Code of Practice For Archaeological Investigation of Aboriginal Objects in NSW*.
 - d. Please amend dot point 6 in Section 7.3.2.1 (Stage 2 Mechanical Excavation) and dot point 3 in Section 7.3.2.5 (Stage 3 Manual Excavation) to include the following additional triggers for cessation of testing: "where the depth of proposed impacts has been reached" and "where sufficient information has been gathered to allow characterisation of the Aboriginal objects present and/or it is determined that controlled salvage excavation is warranted".
 - e. Please amend dot point number 7 in Section 7.3.2.1 (Stage 2 Mechanical Excavation) and dot point number 3 in Section 7.3.2.5 (Stage 3 Manual Excavation) to include consideration of the use of manual methods where test excavation is required below safe depths to confirm the presence/absence of cultural material and/or explore the extent/depth of the cultural deposits. Potential methods could include stepping/shoring, the use of 50cm x 50cm shovel

pits within the proposed 2mx1m test trenches or auguring (where appropriate to identify the depth of midden deposits). Where an alternative approach is required, this should be discussed and agreed to with Heritage NSW.

- f. Please update the methodology to include a requirement to collect material suitable for dating where Aboriginal objects and/or stratified archaeological deposits are encountered. This should include provisions for collection OSL samples in the absence material suitable for radiocarbon dating methods.
- g. Please update the methodology to include provisions for submitting site card update / Aboriginal site impact recording forms (ASIRF) to AHIMS following the completion of the sub-surface investigations.

On the basis that the above comments will be addressed when developing the draft ACHMP should the project be approved, Heritage NSW has provided recommendations in relation to Draft Conditions of Consent, as included in **Attachment A**. Heritage NSW has no further comments on the proposal at this time.

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

Yours sincerely,

Alison Lamond

Alison Lamond
A/Strategic Manager
Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*

20 May 2025

Attachment A - Recommended Draft conditions for Aboriginal Cultural Heritage

Below are our recommended draft conditions for the protection of Aboriginal Heritage and the implementation of an Aboriginal Cultural Heritage Management Plan (ACHMP).

Aboriginal Heritage

3. All reasonable steps must be taken so as not to harm, modify or otherwise impact Aboriginal objects except as authorised by this approval.
4. The Registered Aboriginal Parties (RAPs) must be kept informed about the SSD. The RAPs must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of the SSD.

Aboriginal Cultural Heritage Management Plan

5. Prior to carrying out any development, the Applicant must prepare an ACHMP for the development to the satisfaction of the Secretary. This plan must:
 - a. be prepared by a suitably qualified and experienced person;
 - b. be prepared in consultation with the RAPs and reviewed by Heritage NSW;
 - c. include a description of the measures (and associated methodologies) that would be implemented for:
 - i. Undertaking further investigations in the form of Aboriginal archaeological test excavations within the approved project area;
 - ii. a strategy for the short-term and long-term management of any Aboriginal objects salvaged under approval;
 - iii. include updated mapping of all areas that have been and will be subject to mitigation measures such as sub-surface investigations;
 - iv. ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions;
 - v. ongoing consultation with RAPs during the implementation of the ACHMP;
 - vi. preparing Aboriginal Site Impact Recording Form/s (ASIRFs) for all Aboriginal heritage sites following construction activities with ASIRFs to be submitted to the Aboriginal Heritage Information Management System (AHIMS) registrar.
 - d. Include provisions for updating the ACHMP to include a salvage excavation methodology should sub-surface investigations reveal Aboriginal cultural material that warrants salvage.
 - e. include a contingency plan and reporting procedure including:
 - i. an Unexpected Heritage Finds and Human Remains Procedure prepared in relation to Aboriginal cultural heritage, with these measures to be prepared in accordance with the guidelines and standards specified by Heritage NSW, be implemented for the duration of the project and to include the requirement to register any newly identified Aboriginal objects or sites in the AHIMS database.

- f. include provision for the preparation of an Aboriginal Cultural Heritage Salvage Report(s) where additional salvage works have been completed. The Aboriginal Cultural Heritage Salvage Report(s), must:
 - i. be prepared by a suitable qualified expert;
 - ii. be prepared in accordance with the *Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW*, 2011 and the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, 2010;
 - iii. document the additional consultation undertaken with RAPs in relation to the ACHMP activities.
 - iv. document the results of the additional sub-surface investigations and/or salvage (with artefact analysis, updated significance assessment and identification of a final repository for finds); and
 - v. include evidence that Aboriginal Site Impact Recording Form/s (ASIRFs) have been submitted to the Aboriginal Heritage Information Management System (AHIMS) registrar as soon as practicable for each Aboriginal site that has been subject to salvage
 - vi. be provided to the RAPs who must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, and the relevant Local Aboriginal Land Council, and the RAPs within 24 months of the completion of the Aboriginal archaeological salvage works.
- g. include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.

Following the Planning Secretary's approval, the Applicant must implement the ACHMP.