

Our ref: HMS ID 11270

Stephen Dobbs
Team Leader Assessments
Department of Planning, Housing and Infrastructure
stephen.dobbs@dpie.nsw.gov.au

Letter uploaded to the Major Projects Planning Portal

Advice on Environmental Impact Statement – State Significant Development

Proposal: Senior Housing - IRT Woonona Redevelopment

Major Project reference: SSD-73910208

Received: 29 July 2025

Dear Stephen,

Thank you for your referral seeking advice on the above State Significant Development proposal. Heritage NSW understands that the development proposal relates to the demolition of selected existing buildings, construction of five new residential buildings, the adaptive reuse of locally listed heritage items, and associated auxiliary infrastructure.

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

- Relevant sections Environmental Impact Statement - prepared by MMJ Town Planning & Advisory, dated 10 July 2025
- Appendix C: Aboriginal Cultural Heritage Assessment Report - prepared by Austral Archaeology, dated 24 April 2025

Following the review of the above documents, Heritage NSW 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 for the project, including the associated recommendations for the management of Aboriginal cultural heritage. Additional information is required in relation to the following matters:

1. We request that additional documentation of the consultation process be provided. The applicant needs to provide evidence that consultation was kept continuous as the last consultation recorded in the ACHAR is dated September 2024. Heritage NSW requires that consultation with Registered

Aboriginal Parties (RAPs) is continuous. Under our policy and guidelines, breaks in consultation of over six months may not constitute continuous consultation.

2. Heritage NSW notes that the Aboriginal Heritage Information Management System (AHIMS) search is greater than 12 months old at the time of submission. Heritage NSW generally requires, as per Requirement 1b of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010), that AHIMS searches are less than 12 months old. Please provide an updated AHIMS search.
3. The culturally modified tree (AHIMS #52-2-4988) is currently located outside of the project area and the ACHAR states it will be avoided, though this may change as the development progresses. Please ensure that if the modified tree is marked for conservation, this is a clearer commitment in the Environmental Impact Statement (EIS) and ACHAR.
4. As per Requirement 23 of *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010) the recording of the site must be consistent with Aboriginal scarred trees in New South Wales, a field manual (DEC and Andrew Long 2005). As such, please ensure that a sketch of the tree and scar that includes the location and shape of scar, location of features (e.g., tool marks), and overall condition of the tree and scar are included in the site recording form.
5. Please include mapping that outlines the area of moderate archaeological potential to be avoided.
6. Section 2.6 of the ACHAR requires updating to finalise the dates of consultation.

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

Yours sincerely,

Alison Lamond

Alison Lamond
A/Manager
Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
22 August 2025