

Our ref: HMS ID 11433

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Letter uploaded to the Major Projects Planning Portal

Advice on Environmental Impact Statement – State Significant Development

Proposal: Mixed-use development with in-fill affordable housing 2-6 Pilgrim Ave and 11-13 Albert Rd Strathfield

Major Project reference: SSD-80432461

Received: 8 August 2025

Dear Edwina,

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 *Environmental Impact Statement Mixed-Use Development with In-Fill Affordable Housing 2-6 Pilgrim Avenue and 11-13 Albert Road, Strathfield* (EIS) - prepared by Ethos Urban, dated 12 June 2025.
- *Aboriginal Cultural Heritage Assessment: 11 – 13 Albert Rd & 2 – 6 Pilgrim Ave Strathfield* (ACHA) - prepared by AMAC, dated 28 March 2025.

The ACHA completed to inform the EIS did not identify any Aboriginal objects or areas of archaeological potential within the study area. Heritage NSW broadly agrees with the conclusions of the assessment and its proposed mitigation measures, however, recommends that the Department requests the following information from the proponent to demonstrate that the assessment complies with the relevant guidelines relating to Aboriginal cultural heritage:

1. Evidence demonstrating that all Aboriginal stakeholders identified by relevant statutory agencies were invited to register for consultation on the project.
2. Evidence demonstrating that all Registered Aboriginal Parties were provided with a copy of the project information and methodology documents, and a copy of the Draft ACHA for their review. This evidence can comprise copies of dated email records with all relevant email addressed shown and/or delivery or read receipts of correspondence.

Provided these matters can be addressed we have included recommended draft conditions of approval 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 James Cole, 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*

2 September 2025

Attachment A - Recommended draft conditions for Aboriginal cultural heritage

Below are our recommended draft conditions for the protection of Aboriginal heritage.

Aboriginal Heritage

1. All reasonable steps must be taken to avoid harm, modification, or other impact to Aboriginal objects except as authorised by this approval.
2. The Registered Aboriginal Parties must be kept informed about the State Significant Development (SSD). The Registered Aboriginal Parties must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of the SSD.
3. Prior to carrying out any development, the Applicant must ensure Aboriginal heritage management procedures are prepared for the development and included in the Project's Construction Environmental Management Plan (CEMP). The Aboriginal heritage management procedures must:
 - a. be prepared by suitably qualified and experienced persons.
 - b. be prepared in consultation with Registered Aboriginal Parties and be reviewed by Heritage NSW.
 - c. include a description of the measures that would be implemented for:
 - i. ongoing consultation with Registered Aboriginal Parties, including consultation regarding changes to the management of Aboriginal cultural heritage.
 - ii. a contingency plan and reporting procedure for the management of Unexpected Heritage Finds and Human Remains that is prepared by suitably qualified and experienced heritage specialist in relation to Aboriginal cultural heritage, in consultation with the Registered Aboriginal Parties and in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010). The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of construction.
 - iii. ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions.