

Our ref: HMS ID 12087

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Letter uploaded to the Major Projects Planning Portal

Advice on Environmental Impact Statement – State Significant Development

Proposal: Berrima Hotel/Berrima Correctional Centre

Major Project reference: SSD-66876472

Received: 13 October 2025

Dear Fadi,

Thank you for your referral seeking advice on the above State Significant Development (SSD) proposal. The proposal is for the adaptive reuse of the Berrima Goal, located at 2-4 Argyle Street Berrima.

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

- Relevant sections of Environmental Impact Statement: Adaptive Reuse of the former Berrima Goal - prepared by Sutherland & Associates Planning, dated September 2025
- Appendix 31: Aboriginal Cultural Heritage Assessment Report Berrima Goal Part 1 and Part 2 - prepared by Austral Archaeology, dated 12 March 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 (SEARs) for the project, including the associated recommendations for the management of Aboriginal cultural heritage. Additional information is required in relation to the matters outlined 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 Sarah McGuinness, 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*

3 November 2025

Attachment A – Detailed Aboriginal Cultural Heritage Advice

Aboriginal Community Consultation

1. Heritage NSW notes that the last recorded consultation with the Registered Aboriginal Parties (RAPs) was in February 2025. Heritage NSW requires that consultation with Registered Aboriginal Parties (RAPs) is continuous and under our guidelines, breaks in consultation of over six months may not constitute continuous consultation. Please ensure that future consultation is kept continuous throughout the assessment of the application.

Aboriginal Cultural Heritage

2. Please provide an updated Aboriginal Heritage Information Management System (AHIMS) search. AHIMS searches are only valid for a period of 12 months.
3. We note that the initial assessment of the project area included identification of areas of archaeological sensitivity, with archaeological test excavation proposed (Stage 2 Methodology Reference 24039). This approach was supported by the RAPs and would be supported by Heritage NSW as an appropriate mitigation measure.

We further note that the assessment of archaeological potential was amended by the time of finalisation of the ACHAR to be of low archaeological potential across the entire project area. The reason for this change is not justified in the ACHAR. We note that this change was also questioned by RAP Duncan Falk Consultancy.

As such, the ACHAR should be updated to include:

- a. Discussion and detailed justification of the changed assessment of archaeological potential.
- b. Further justification to the assessment of the project area as extensively disturbed. Heritage NSW note that areas outside of deep construction associated with the goal footings may retain intact soils.
- c. Analysis of any geotechnical or soil analysis undertaken within the project area. This analysis should be used to inform the updated assessment of disturbance and archaeological potential.

If geotechnical studies have not been undertaken, Heritage NSW recommend that these are prepared to inform the EIS and the ACHAR.

4. Where adequate justification cannot be provided, Heritage NSW will require test excavations undertaken to characterise and define the nature of the soils, identify where intact soil profile/s remain, and define the extent and types of disturbance present. If test excavations cannot occur owing to the potential for contact archaeology, a methodology for excavations must be prepared for review and endorsement by Heritage NSW for test excavations to occur prior to any project approval.
5. Please update the ACHAR to include discussion for the potential for contact archaeology within the project area.
6. Please update the ACHAR to include discussion for the potential for historic Aboriginal burials within the project area associated with the early phases of gaol use.