

Mr Tom Kennedy
Director

INFRASTRUCTURE NSW
L15, 167 Macquarie Street

Sydney New South Wales 2000

04/07/2019

Dear Mr Kennedy

Modification 2 Removal of ground slabs and existing piles (SSD-9249-Mod-2)
Request for Additional Information

I refer to Assessment for the Modification 2 Removal of ground slabs and existing piles (SSD-9249-Mod-2). After careful consideration, the Department is requesting that you provide the additional information as detailed in **Attachment 1**.

You are requested to provide the information, or notification that the information will not be provided, to the Department by Thursday 01 August 2019. If you are unable to provide the requested information within this timeframe, you are requested to provide, and commit to, a timeframe detailing the provision of this information.

If you have any questions, please contact Aditi Coomar, who can be contacted on 02 8217 2097 or at aditi.coomar@planning.nsw.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'KH', with a long horizontal flourish extending to the right.

Karen Harragon
Director, Social And Infrastructure Assessments
Social And Infrastructure Assessments

Enclosed: Attachment 1

ATTACHMENT 1

Consistency of documents

- The modification application includes an Addendum Archaeological Impact Statement (AAIS). The AAIS states that the methodology, recommendations and management measures relating to Aboriginal archaeology and cultural heritage are consistent with those prepared for the Aboriginal Cultural Heritage Assessment Report (ACHAR) supporting the Sydney Football Stadium Redevelopment Stage 2 application (SSD-9835), which is currently on exhibition.
- However, the recommendations in the AAIS are not fully consistent with the exhibited ACHAR. The following information is required to confirm that a consistent approach is undertaken in all stages of the development:
 - The unexpected finds protocol in the AAIS should comprise the removal of displaced Aboriginal objects within historical archaeological deposits (similar to the ACHAR).
 - The AAIS proposes monitoring during the trenching for the stormwater diversion. However, it should include the removal of historic fill, including removal of objects found (if any) and then testing of the area to be trenched, in case of natural soil profiles being present. Depending on the findings of the testing, significant features should be explored (to the full extent of the feature) or salvage expansion should be undertaken. The methodology should be amended and resubmitted to reflect these requirements and be consistent with the ACHAR.

Absence of testing

- The AAIS does not provide clear reasons to justify why testing and salvage have not been undertaken on the site in accordance with best practise methodology. Detailed justification prepared by a suitably qualified specialist must be submitted in this regard, including detailed provisions to explore alternate options addressing the constraints and salvage (i.e. expansion to allow safer access to great depths), must be provided.

Test excavation depth

- Testing and salvage excavation are only proposed to extend to the development impact zone (i.e. ground disturbance). However, if the excavation does not extend to down to a culturally sterile layer, objects could be present and impacted by the development through compaction. Consequently, the excavation must be extended to the culturally sterile soils. Evidence shall be provided by a suitably qualified person as to the extent that the culturally sterile layer has been determined as likely to be occurring.

Test Excavation Methodology

- The AAIS proposes mechanical excavation at targeted locations, to test the potential for presence of Aboriginal archaeological material within the natural soil profile. It states that if sensitive Aboriginal features are identified with test trenches then hand excavation would commence. The test units are proposed to be 3 metres (m) x 2m and the spits at 200 millimetres (mm).
- This is not considered to be a satisfactory approach or best practise approach and the following requirements are to be complied with as part of the test excavation methodology:
 - Except for removing historic fill, machinery should not be used for conducting test excavation.
 - *The Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (the Code) states that the maximum continuous surface area for test units must be no greater than 3 square meters. The Code also states at each test unit, the first spit must be 50mm. Based on evidence from the first spit, 100mm spits maybe implemented thereafter. The proposed test units and splits for this project must comply with the requirements of the Code.
 - All materials excavated from the test excavation units and the expansion units must be sieved using a wire-mesh sieve with a 5mm aperture.
 - The AAIS must include details of the spit that are proposed to be used for excavating the sensitive archaeological features.
 - The AAIS must include the details of the number of archaeological artefacts (referred to as high in the report) that would trigger salvage excavation.
- The AAIS shall be resubmitted with the updated methodology detailing the above.

Post excavation report

- It is proposed that testing would occur in an area where the natural soil profile has been identified and the area is to be impacted by development works. Alternatively testing would occur in a future development impact zone where test excavation is possible. In this regard, the post excavation report is required to document:
 - where the development works are going to occur
 - the basis on which the natural soil profile was identified in these areas
 - on what basis was testing not undertaken if this is the decision and what other options were explored to test.
- The AAIS should be resubmitted including the required updated details that are to be provided in a post excavation report as detailed above.

Salvage Excavation

- The AAIS states that where expansion units fail to yield a significant Aboriginal archaeological deposit (i.e. artefact density of less than 2 artefacts per square metre or the absence of any other usual or significant archaeological feature), excavation would cease. You are requested to clarify the above statement by indicating whether this relates to each subsequent spit in an expansion unit.
- The AAIS must confirm that a sensitive archaeological feature would be explored to its full extent, not to the extent of the development impact zone only. Notwithstanding whether partial or full impact is expected, the feature must be fully recorded.
- The AAIS must also confirm that significant feature excavation or a salvage excavation within a test unit would be undertaken to the depth of the culturally sterile soil.
- The AAIS should be resubmitted including the required updated details in relation to Salvage Excavation.
