

**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

3 September 2020

Department of Planning, Industry and Environment
4 Parramatta Square, 12 Darcy Street
NSW 2124

Att: Mr Patrick Copas

To whom it may concern,

74 EDINBURGH ROAD, MARRICKVILLE - SSDA 10468 - ABORIGINAL CULTURAL HERITAGE ASSESSMENT

Urbis was been engaged by Woolworths Group Limited (the Proponent) to prepare an Aboriginal Objects Due Diligence Assessment (ADD) for Lot 202 in DP 1133999 and Lot 101 in DP 1237269 at 74 Edinburgh Road, Marrickville, NSW. The ADD was produced based on the Aboriginal and non-Aboriginal cultural heritage requirements provided below in the Planning Secretary's Environmental Assessment Requirements (SEARs) (SSD - 10468) issued on 30 June 2020.

- *Identification and assessment of potential impacts on Aboriginal cultural heritage values, including a description of any measures to avoid, mitigate and/or manage any impacts. Justification for reliance on any previous Aboriginal Cultural Heritage Assessment Report or other heritage assessment for the site must be provided*
- *An assessment of potential impacts on State and local heritage items in the surrounding area.*

The ADD was prepared to investigate whether the proposed development will have the potential to harm Aboriginal objects and/or places that may exist within the subject area and inform the proposed development of any Aboriginal archaeological and heritage constraints. The assessment was prepared in accordance to the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW, 2010) ('Due Diligence Code'), and included the following:

- Comprehensive background research of the Aboriginal Heritage Information Management System (AHIMS) register.
- Searches of statutory and non-statutory heritage listings.
- Analysis of previously conducted archaeological assessments in the vicinity of the subject area.
- Landscape analysis.
- Analysis of historical land use and impact on the subject area.

The ADD concluded the following:

- There are no Aboriginal sites/objects/places registered within the subject area.



- The subject area is located within 200m of a natural tributary of the Cooks River, suggesting a moderate to high potential for Aboriginal objects.
- The nearest registered Aboriginal site to the subject area is AHIMS ID# 45-6-2654 is a Potential Archaeological Deposit (PAD) located approximately 900m to the south-west adjacent to the same ephemeral waterway as the subject area.
- The subject area has been the subject of moderate to high ground disturbance by historical land use.
- The subject area is in the Birrong Soil Landscape, a soil landscape of considerable depth. The depth of which may limit the impacts of historical ground disturbance to the upper soil profile.
- Due to the depth of the soil landscape and proximity to water, it is considered that the subject area has moderate to high archaeological potential.

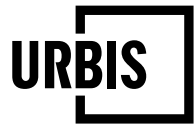
Urbis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the recommendations of the ADD undertaken by Urbis (2020) and in response to the Aboriginal Cultural Heritage Requirements provided in Attachment A – EES Environmental Assessment Requirements – Woolworths Distribution Centre, 74 Edinburgh Road, Marrickville - SSD 10468 (18 June 2020) and reproduced below.

1. *Identify and describe the Aboriginal cultural heritage values that exist across the whole area that would be affected by the development and document these in an Aboriginal Cultural Heritage Assessment Report (ACHAR). This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH 2010), and guided by the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011).*
2. *Consultation with Aboriginal people must be undertaken and documented in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW). The significance of cultural heritage values for Aboriginal people who have a cultural association with the land must be documented in the ACHAR.*
3. *Impacts on Aboriginal cultural heritage values are to be assessed and documented in the ACHAR. The ACHAR must demonstrate attempts to avoid impact upon cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the ACHAR must outline measures proposed to mitigate impacts. Any objects recorded as part of the assessment must be documented and notified to OEH.*

Note that due diligence is not an appropriate assessment, an ACHAR is required.

The ACHA is being undertaken in accordance with the following guidelines:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (Department of Environment, Climate Change and Water (DECCW, 2010) (the Consultation Guidelines).*
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (Office of Environment and Heritage 2011) (the Assessment Guidelines).*
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010).*



- *The Australia ICOMOS Charter for Places of Cultural Significance, The Burra Charter, 2013 (Burra Charter).*

The ACHA is currently within Stage 1 of the Aboriginal community consultation, with the public notice scheduled for publication in the 9th September edition of the Koori Mail.

It is anticipated that the final ACHA report will be completed in December 2020.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Andrew Crisp". The signature is written in a cursive style and is underlined.

Andrew Crisp
Senior Consultant
+61 2 8233 7642
acrisp@urbis.com.au