



Our ref: DOC21/601368

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Advice provided via the Major Projects Portal

Dear Mr Copas

Advice on Aboriginal Cultural Heritage Assessment Report (ACHAR) for SSD–10468, Warehouse and Customer Fulfillment Centre, Marrickville

Thank you for referring the ACHAR for the above State Significant Development (SSD) to Heritage NSW for comment. We understand this SSD relates to the proposed Warehouse and Customer Fulfillment Centre at Lot 202 in DP 1133999, Lot 3 in DP 318232 and Lot 3 in DP 180969, commonly known as 74 Edinburgh Road, Marrickville, New South Wales.

Review of Aboriginal Cultural Heritage Assessment 74 Edinburgh Road, Marrickville 12 February 2021

The ACHAR 'concluded that there is moderate to high potential for subsurface Aboriginal objects and archaeological resources within the underlying soil landscape and recommends additional investigation in the form of archaeological excavation. This excavation is to establish the presence/absence and extent of subsurface archaeological resources that may be present within the subject area (Page 66).' Heritage NSW support this assessment and conclusion.

The ACHAR in addition outlines indicative actions for areas that have moderate to high potential which include the following (Page 46):

- **High:** Detailed archaeological investigation including but not limited to survey, test excavation and potentially (depending on density and/or significance of archaeological deposit) salvage excavation.
- **Moderate:** Detailed archaeological investigation including but not limited to survey, test excavation and potentially (depending on density and/or significance of archaeological deposit) salvage excavation.

The ACHAR does not propose when or how this archaeological testing and salvage is to be conducted and predominately recommends monitoring. Heritage advise that monitoring is not a sufficient assessment. Please note that it is understood that archaeological testing and salvage cannot be conducted until after the removal of the existing infrastructure and slab.

Aboriginal cultural heritage regulation advice

Heritage NSW notes that recommendations for Aboriginal cultural heritage are outlined in section 9 of the ACHAR (pages 68 – 69).

Whilst monitoring is supported during the removal of fill, it is recommended that an Aboriginal cultural heritage research design and excavation methodology, including a staged testing and salvage program, be developed for those areas with intact deposits.

An Aboriginal cultural heritage research design and excavation methodology needs to be formulated that includes at least the following:

- Aboriginal cultural heritage research questions
- The proposed staging and timing of excavations in relation to the development phases
- A staged testing and excavation methodology for those areas of moderate and moderate to high archaeological potential
- Detailed triggers for expansion of test pits to salvage excavation
- A methodology for the excavation of features such as, but not limited to, hearths, knapping floors and middens
- Artefact analysis methodology
- Identified stop points where additional consultation with registered Aboriginal parties and Heritage NSW may be required if significant Aboriginal objects are identified
- Sampling and dating methodology
- Short term and long term care and control of any Aboriginal objects
- Reporting requirements

Furthermore, the Aboriginal cultural heritage research design and excavation methodology must be formulated in consultation with the registered Aboriginal parties for the project.

Please note: the above comments relate only to Aboriginal cultural heritage regulation matters. You may wish to seek separate advice from Heritage NSW in relation to matters under the *Heritage Act 1977*.

If you have any questions regarding the above advice please contact Kym McNamara, Archaeologist, Aboriginal Cultural Heritage Regulation – South, at Heritage NSW on (02) 6229 7028 or via email at kym.mcnamara@environment.nsw.gov.au.

Yours sincerely



Jackie Taylor
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Heritage NSW
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