



Our ref: DOC22/334379-2  
Your ref: MP09\_0161-PA-19

Ms Megan Fu  
Principal Planning Officer  
Department of Planning and Environment  
Email: [megan.fu@planning.nsw.gov.au](mailto:megan.fu@planning.nsw.gov.au)

Advice provided via the Major Projects Portal

Dear Ms Fu

**Aboriginal Cultural Heritage Advice – Environmental Impact Assessment  
SSD-13619238, Greenwich Hospital Redevelopment, 95-115 River Road, Greenwich  
Lots 3 and 4 in DP584287**

Thank you for referring the Environmental Impact Assessment (EIS) for the above State Significant Development (SSD) to Heritage NSW for comment. We understand this SSD relates to the Greenwich Hospital Redevelopment in the Lane Cove Local Government Area. The proposal includes demolition works, construction of an eleven-storey replacement hospital and five new six-storey facilities along with the adaptive reuse of Pallister House.

In preparing this advice we have reviewed the:

- Environmental Impact Assessment (EIS) prepared by Ethos Urban, dated 26 August 2022
- Construction Management Plan (CMP) prepared by Roberts Co (NSW) Pty Ltd dated 9 June 2022
- Updated Aboriginal Archaeological Impact Assessment and Consultation prepared by Cultural Heritage Connections, dated May 2022
- Heritage Interpretation Strategy prepared by Build Environmental Heritage Group, dated May 2022.

**We have considered how the Aboriginal cultural heritage SEARs have been addressed**

The Secretary's Environmental Assessment Requirements (SEARs) that were issued on 24 February 2021 require the applicant to:

- Demonstrate that the recommendations of the Aboriginal Cultural Heritage Assessment Report approved under SSD-8699 have been addressed in the proposed development.
- Provide an Aboriginal Cultural Heritage Management Plan (ACMP) that has been prepared in consultation with the registered Aboriginal parties (RAPs).

SSD-8699 is the Concept Plan Approval for the project. The SEARs for SSD-8699 were issued on 14 September 2017 and required the applicant to:

- Where relevant, address Aboriginal Cultural Heritage in accordance with the *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011) and *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

An Aboriginal Cultural Heritage Assessment Report (ACHAR) was subsequently prepared by Cultural Heritage Connections, dated December 2018. The ACHAR documented Aboriginal community consultation and an archaeological assessment in accordance with the listed guidelines and the 2017 SEARs for the Concept Plan (SSD-8699).

In our review of the 2022 updated Aboriginal Archaeological Impact Assessment, we have considered how the 2021 SEARs for SSD-13619238 have been addressed, which focus on how the recommendations of the 2018 ACHAR have been implemented.

#### **The recommendations of the 2018 ACHAR have been partly addressed**

The updated Aboriginal Archaeological Impact Assessment and Consultation (Cultural Heritage Connections 2022) partially addresses the recommendations of the 2018 ACHAR in that:

- An updated Aboriginal community consultation process has been conducted, as the previous consultation had lapsed. Broadly, the feedback from the Registered Aboriginal Parties emphasised the cultural importance of the area and generally supported the proposed assessment approach.

#### **There are some matters that have not yet been addressed**

- Archaeological test excavation in the identified area of moderate archaeological potential, as recommended in the updated assessment (Cultural Heritage Connections 2022) has not yet been conducted.
  - This area broadly corresponds with the proposed Stage 5 development area. It is unclear how design refinements recommended in the ACHAR (2018) have been implemented to minimise harm to this area.
  - There is a risk that without conducting the test excavations to date that there may be impacts to unidentified Aboriginal cultural heritage values that are not currently able to be assessed.
- The Aboriginal Cultural Heritage Management Plan has not yet been prepared. The updated assessment (Cultural Heritage Connections 2022), p.43) notes that the Aboriginal Cultural Heritage Management Plan (ACHMP) is being prepared and will include information from the test excavations where appropriate.

#### **Heritage NSW Aboriginal cultural heritage recommendations**

We recommend that:

- A map overlay showing the identified area of moderate archaeological potential with the proposed works footprint be prepared to inform ongoing management.
- Archaeological test excavation be conducted at an early stage to inform the final design, particularly of Stage 5. We recommend that test excavation is conducted pre-approval wherever possible.
- The ACHMP is prepared in consultation with Heritage NSW and the RAPs and in consideration of the results of the test excavations.
- The CMP include procedures for managing the identified area of moderate archaeological potential.

- Once finalised, the measures outlined in the ACHMP need to be integrated with the CMP and other construction management procedures to avoid the risk of unintended harm to any identified Aboriginal cultural heritage values should this SSD application be approved.
- The results of the test excavations and ACHMP recommendations be incorporated into the Heritage Interpretation Strategy as appropriate.

Please note: the above comments relate only to Aboriginal cultural heritage regulation matters. Heritage NSW may provide separate comments in relation to environmental heritage and matters under the *Heritage Act 1977*.

If you have any questions regarding the above advice please contact Rose O'Sullivan, Senior Assessments Officer, at Heritage NSW on (02) 224 4177 or via email at [rose.osullivan@environment.nsw.gov.au](mailto:rose.osullivan@environment.nsw.gov.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'N91 Davis'.

Nicole Davis

Manager Assessments

Heritage NSW

Department of Planning and Environment

(As Delegate under *National Parks and Wildlife Act 1974*)

Date: 21 October 2022