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Joelle Khnouf
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Dear Joelle,

DORAN DRIVE PRECINCT, 2 MANDALA PARADE, CASTLE HILL – SSD-15882721 - RESPONSE TO SEARS

Urbis has been engaged by Deicorp Projects Showground Pty Ltd (Deicorp) to prepare a Heritage and Archaeological Impact Statement (HAIS) and Preliminary Aboriginal Due Diligence (ADD) letter for a State Significant Development (SSD-15882721) at the Doran Drive Precinct, 2 Mandala Road, Castle Hill NSW (herein referred to as the subject site).

BACKGROUND

The proposed development consists of the construction of a 20-storey mixed-use development, comprising retail, commercial and community space, 431 residential units and a public plaza.

The proposed development follows the recent approval of the Concept SSDA for the Hills Showground Station Precinct on 29 January 2021. As part of this previous SSDA an Aboriginal and Non-Aboriginal Heritage Assessment was prepared along with a Heritage Interpretation Strategy by GML for the whole of the precinct. The reports prepared as part of the existing SEARs utilised relevant information from these previous reports.

The Planning Secretary's Environmental Assessment Requirements (SEARs) for the SSDA were issued on 30 March 2021. Condition 13 requires the preparation of heritage management documents, as listed below:

13. Heritage

Include a Heritage Impact Statement, prepared in accordance with relevant guidelines, assessing the impact of the proposal on the heritage significance of the site and surrounding area, including heritage items, conservation areas and archaeology, and includes measures to reduce or mitigate any unavoidable impacts.

Include an Aboriginal Cultural Heritage Assessment Report in accordance with relevant guidelines, identifying, describing and assessing any impacts for any Aboriginal cultural heritage values on the site, including archaeology.

METHODOLOGY

As per the SEARs requirements, a Heritage and Archaeological Impact Statement (HAIS) and Preliminary Aboriginal Due Diligence (ADD) letter have been prepared to accompany the SSDA.

These have been prepared in accordance with the NSW Heritage Division guidelines:

- 'Assessing Heritage Significance' (NSW Heritage Office 2001)
- 'Statements of Heritage Impact' (NSW Heritage Manual 1996)
- 'Assessing Significance for Historical Archaeological Sites and 'Relics' (NSW Office of Environment and Heritage (OEH) (2009).
- 'Historical Archaeology Code of Practice' (Heritage Council of NSW 2006).

It should be noted that the preliminary ADD is intended to summarise and verify the outcomes of GML's 2019 assessment in respect of the Aboriginal archaeological potential of the subject area. As such, it does not comply with the steps as outlined in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW, 2010) ('Due Diligence Code').

SUMMARY FINDINGS

The findings of the HAIS and Preliminary ADD letter are summarised below.

Heritage and Archaeological Impact Statement (HAIS)

In respect of the subject SSDA, the HAIS determined that there would be:

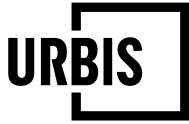
- no impact on local heritage item 'House' (item no. I68) on the grounds that it would have no impact on its physical and visual curtilage or historical heritage values;
- a minor but acceptable impact on local heritage item 'House' (item no. I69). The proposed residential towers would be visible from I69, however, as the cottage dwelling is located uphill and setback from Showground Road, this would reduce impacts to its setting and views. The proposal would have no impact on the item's physical curtilage or historical heritage values;
- a minor but acceptable impact on the former Hills Showground. While it is recognised that the proposal would alter the setting and visual curtilage of the former Castle Hill Showground, this impact is reduced in light of the considered podium design and reinvigoration of the area which it would afford. The proposal would generate opportunities for communication and public awareness of the Showground and its historical value within the Castle Hill area; and
- nil-low potential to impact significant historical archaeological resources.

For the reasons stated above, the proposed works are recommended for approval from a heritage perspective having regard to the proposed recommendations below.

Recommendation 1 – Heritage Interpretation

GML's Heritage Interpretation Strategy should be incorporated into the design. Interpretation should be developed throughout detailed design and construction phases in conjunction with the project architect and other specialists as required.

Recommendation 2 – Unexpected Finds Procedure



Should historical archaeological resources be uncovered while undertaking works at the subject site, all activities must stop and Heritage NSW be immediately notified. An appropriately qualified archaeologist should also be consulted for the purpose of implementing best practice protection and conservation measures while the relevant approvals are obtained.

Preliminary Aboriginal Due Diligence Letter

In respect of the subject SSDA, the Preliminary ADD letter established that the subject area has nil to low potential for Aboriginal archaeological sites and/ or places.

In addition to the above, the following recommendations are made:

Recommendation 1 – Aboriginal Cultural Heritage Induction

It is recommended that periodic Aboriginal cultural heritage inductions be provided during excavation works, as prepared by Urbis. The induction material should include an overview of the types of sites and artefacts most relevant to the site (i.e. stone tools and concentrations of shells that could be middens) and the requirements of an 'archaeological chance find procedure' (refer below). This should be prepared for the project and included in any site management plans.

Recommendation 2 - Archaeological Chance Find Procedure

In concurrent of the recommendations of the Heritage and Archaeological Impact Statement (Urbis 2021), in the event that any Aboriginal objects are uncovered during site works, all activities must stop and Heritage NSW be immediately notified. An appropriately qualified archaeologist should be consulted for the purpose of implementing best practice protection and management measures while the relevant approvals are obtained.

Recommendation 3 – Human Remains

In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

- All works within the vicinity of the find immediately stop.
- Site supervisor or other nominated manager must notify the NSW Police and the Aboriginal Cultural Heritage Regulation Branch of the Department of Premier and Cabinet.
- The find must be assessed by the NSW Police, and may include the assistance of a qualified forensic anthropologist.
- Management recommendations are to be formulated and applied in consultation with the Police, The Aboriginal Cultural Heritage Regulation Branch of the Department of Premier and Cabinet and site representatives.
- Works are not to recommence until the find has been appropriately managed.

If any further information is required, please do not hesitate to contact the undersigned.

Yours sincerely,



A handwritten signature in black ink, appearing to read "AR", with a long, sweeping horizontal stroke extending to the right.

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