



Our ref: DOC22/735668

Ms. Megan Fu
Principle Planning Officer
Department of Planning and Environment
megan.fu@planning.nsw.gov.au

Dear Megan,

Heritage NSW – Aboriginal Cultural Heritage (ACH) - Environmental Impact Statement (EIS) – Ryde Hospital Redevelopment Concept & Stage 1 (SSD-36778089) (City of Ryde)

Heritage NSW has reviewed the Appendix R - Aboriginal Cultural Heritage Assessment Report, Ryde Hospital Redevelopment (Concept and Stage 1), Health Infrastructure NSW Urbis, 22 July 2022 with respect to Aboriginal cultural heritage, and make the following comments and recommendations.

The Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared for the entirety of the Ryde Hospital Campus comprising Lots 10 and 11 in DP1183279, however, the SSD relates to the concept plan for proposed redevelopment within a concept building envelope and Stage 1 early works, which will involve impacts in the northern section of the landholding only.

Heritage NSW notes that consultation undertaken as a component of the ACHAR substantially complies with Clause 60 of the *National Parks and Wildlife Regulation 2019* with *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (2010). It is recognised that one Registered Aboriginal Party identified that they did not review or provide input on the draft ACHAR but that they would be prepared to share cultural information under a contract arrangement with non-disclosure provisions. The ACHAR includes a statement that these concerns were raised with the proponent however no outcomes were documented. Heritage NSW should be advised of the outcomes any such discussions.

The ACHAR identifies that there are no registered Aboriginal sites or Aboriginal places located within the subject area. The northern portion of the subject area (incorporating the concept proposal and Stage 1 early works area) was assessed as having nil to low archaeological potential. The southern portion of the subject area variably had low or moderate archaeological potential and is not included within the concept proposal and Stage 1 early works area.

Based on the information presented in the ACHAR, Heritage NSW is satisfied that the above assessments are accurate and that there is a low likelihood of harm to Aboriginal objects or places within the concept plan and Stage 1 early works area. Given this outcome, there is insufficient grounds for the recommendation provided in the ACHAR that an archaeologist be present to monitor the proposed demolition of buildings and bulk earthworks under Stage 1. Heritage NSW does not support this recommendation.

The ACHAR refers to the preparation of an Archaeological Monitoring Methodology and Management Strategy. Given the above and for consistency, Heritage NSW recommends that the applicant prepare an Aboriginal Cultural Heritage Management Plan (ACHMP) for the development. The ACHMP must:



- a) Be prepared in consultation with Heritage NSW and Registered Aboriginal Parties
- b) Be submitted for approval prior to the commencement of Stage 1 early works
- c) Include the following:
 - A description of the mechanisms for ongoing consultation with Registered Aboriginal Parties regarding the management of Aboriginal cultural heritage within the approved development area
 - A description of the strategies for management of unexpected Aboriginal objects (if identified)
 - A description of the strategies for management of human skeletal remains (if identified)
 - A strategy for the storage of any Aboriginal objects (if identified), including both short-term and long-term strategies.

If you have any questions regarding these comments, please contact Nicola Roche, Senior Assessments Officer, at Heritage NSW nicola.roche@environment.nsw.gov.au

Kind Regards

Nicole Davis

Manager Assessments

Heritage NSW

Department of Planning and Environment

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

Date: 7 September 2022