



Office of
Environment
& Heritage

Our reference: DOC15/218430
Contact: Marnie Stewart, 9995 6868

Mr Ben Eveleigh
Key Site Assessments
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Eveleigh

I refer to your letter received by the Office of Environment and Heritage (OEH) on 10 June 2015 requesting comments on the Environmental Impact Statement (EIS) for the Sumatran Tiger Adventure, Taronga Zoo, during the public exhibition (SSD 6864).

OEH provides the following comments in regard to Aboriginal cultural heritage.

Aboriginal cultural heritage

OEH is currently assessing an Application for an Aboriginal Heritage Impact Permit (AHIP) under section 90 of the *National Parks and Wildlife Act, 1974* for AHIMS site #45-6-1959, which immediately adjoins the area subject to the SSD application. The AHIP concerns proposed conservation and remediation works to AHIMS site #45-6-1959 by seeking to remove several trees which are causing harm to this site. These trees are located on a sandstone wall to which the AHIMS site #45-6-1959, a rock shelter with art, is attached. The applicant (Taronga Conservation Society Australia) has argued that the removal of these trees is necessary prior to the commencement of the SSD activities. OEH has been in discussion with the applicant about the AHIP application.

OEH has reviewed several relevant components supporting the EIS. OEH understands that the SSD activities which may cause harm to the AHIMS site include the removal of former animal shelters located immediately above the rock wall, to which the rock shelter is attached. It is proposed that the SSD will resolve outstanding stormwater and ground water management which will reduce the water movement over and through the rock shelter, thus reducing harm to the artwork and shelter by excess water activity. The SSD has also considered the movement of machinery and construction activities including demolition of existing structures as well as excavation. The management of loads in relation to the rock wall have also been incorporated into the SSD. In particular, this last component of SSD work will be monitored through vibration assessment. There are also proposed management works within the Construction Environmental Management Plan (CEMP). These elements are appropriate to ensure the ongoing protection and conservation of this significant Aboriginal cultural heritage site. OEH further notes that this site is the only currently known Aboriginal site within Taronga Zoo, although several others exist in land surrounding it.

The Aboriginal cultural heritage assessment report (ACHAR) which was provided in support of the SSD application has also been reviewed by OEH. The ACHAR has identified that once existing/former animal shelters and paths above site #45-6-1959 are removed this will stop water being directed over the edge of the rock face and into the Aboriginal site. This should assist in reducing water seepage through the rock and into the artwork, which has been steadily deteriorating since its first recording in 1990. However, OEH notes that the stormwater and wastewater plans supplied with the EIS do not appear to show how water will be captured and redirected to avoid this site. There is no discussion in the EIS as to whether additional water management other than removal of existing structures and paths is necessary and if so what is proposed. This is an important element which OEH recommends be resolved with the applicant prior to determining the application. Without this clarity, AHIMS site #45-6-1959 may continue to deteriorate from persistent water movement within the sandstone wall. This activity is likely to make the current deterioration worse and result in future collapse of the shelter and loss of its remaining artwork.

OEH understands that the application has addressed requirements of Aboriginal community consultation and the identification of areas of significant Aboriginal cultural heritage values in accordance with the SEARs. Considering the above advice, OEH recommends that DPE seek advice from the applicant as to whether additional water re-direction is necessary and required to address this existing issue and ensure the future protection of AHIMS site #45-6-1959. In the event that additional water re-direction is required, OEH recommends that these details should be clearly incorporated into the plans and EIS documentation and provided to DPE prior to determination of the SSD application. OEH advises that provided DPE is satisfied that the applicant has addressed the matter of water re-direction in relation to AHIMS site #45-6-1959, further referral to OEH on this matter is not required.

If you have any queries regarding this matter please contact Marnie Stewart, Senior Operations Officer, on 9995 6868.

Yours sincerely

S. Harrison 26/06/15

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