

7 June 2019

Oliver He  
Project Manager  
**TSA Management**  
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Dear Oliver,

Further to our recent telephone discussion, I have reviewed the information you provided regarding ongoing management of Aboriginal heritage at the Greenwich Hospital site.

As you are aware, I completed an Aboriginal Cultural Heritage Assessment (ACHA) including an Archaeological Technical Report (ATR) for the proposed redevelopment located at 97 – 115 River Road, Greenwich, NSW. The assessments concluded that there was low potential for most of the subject land to contain Aboriginal objects. One area in the east of the project site was found to contain intact rock overhangs and was assessed as having moderate potential to contain Aboriginal objects. The area of moderate potential is shown in Figure 8 of the ATR.

You provided by email a recommendation supplied by OEHL that “A comprehensive Aboriginal Heritage Management Plan (AHMP) be developed and approved by the Secretary prior to any ground disturbing works commencing.” Subsurface testing was also recommended in the area of archaeological potential to inform the AHMP.

I concur that this would be an effective way to manage heritage values on the site. In order for a subsurface testing programme to be designed, information about the impacts of the proposed works would be required. It is not usually best archaeological practice to conduct test excavation in areas that are not going to be subject to impact. Rather, in these cases any archaeological material can be conserved as a preferred outcome. In light of this, I would suggest that the AHMP be prepared once the full design and extent of development is known. The completed assessment provides information, as discussed above, that can assist in designing the project to minimise impact to Aboriginal heritage values and areas of archaeological potential.

No ground surface disturbing works should be undertaken in the area of moderate potential prior to assessment and preparation of an AHMP. If the area of moderate potential is not to be subject to impact, an appropriate management document should still be prepared to consider protection during significant ground surface disturbing works in the remainder of the site and any indirect impacts from the adjacent development.

Minor surface disturbing works outside the area of archaeological potential have a low likelihood of impact to Aboriginal objects. Additionally, certain activities including “sub-surface geophysical surveys that involve downhole logging” are listed as low impact activity in the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales. Low impact activities do not require a due diligence inspection.

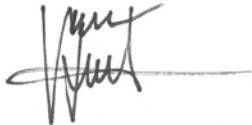


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In the absence of known sites and in light of the assessment of low archaeological potential, geotechnical testing in the western portion of the site as indicated in your email of 6 May 2019 does not require any additional archaeological assessment and is highly unlikely to impact any Aboriginal object. If unexpected Aboriginal objects do occur there is a protocol within the assessment report that should be followed.

I trust this information will assist the progress of the project. Please do not hesitate to contact me on 0410 030 986 or via email: [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au), if you have any questions or concerns or would like to discuss any aspect of this letter further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Vanessa Hardy', with a long horizontal line extending to the right.

Vanessa Hardy

Director & Archaeologist