

# Chapter 9

## Aboriginal heritage



## 9 Aboriginal heritage

This chapter provides an assessment of the potential impact on Aboriginal heritage and areas of Aboriginal archaeological potential as a result of this proposal, and identifies mitigation measures to minimise these impacts. This chapter draws on information provided in Technical Paper 4 (Aboriginal cultural heritage assessment report).

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### 9.1 Overview

Consultation carried out to support the Aboriginal cultural heritage assessment report (ACHAR) for the major civil construction work between Westmead and The Bays (Stage 1 of the planning approval process) has been continued for this proposal. A total of 62 stakeholders registered their interest in the Sydney Metro West project. Aboriginal community consultation has continued to be conducted for the proposal in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010*.

Consultation has shown the study areas are part of a wider cultural landscape of high cultural significance to many of the Registered Aboriginal Parties (RAPs) despite the construction sites for the proposal being within heavily modified urban landscapes which have been significantly altered. No known Aboriginal archaeological sites would be impacted by the proposed work at the Pyrmont Station construction sites.

Portions of the Hunter Street Station (Sydney CBD) western construction site have been identified to demonstrate low Aboriginal archaeological potential. It is unlikely that the proposal will impact Aboriginal objects or sites at this location, although if intact remnant deposit associated with the Tank Stream were located Aboriginal objects may be present and impacted. These items may still have broader cultural significance.

No other areas of Aboriginal archaeological potential were identified across the other construction sites. There is no potential for impacts to Aboriginal objects or sites from the proposal for the remainder of the construction sites.

Proposed works would be unlikely to result in sufficient ground movement to disturb potential sub-surface Aboriginal sites.

The background context provided in this report indicates that the survivability of archaeological contexts at the proposal construction sites is considered very low and no Aboriginal testing or salvage excavation is proposed. However, should unexpected Aboriginal objects be identified, further archaeological management may be required.

### 9.2 Legislative and policy context

The Secretary's Environmental Assessment Requirements relating to Aboriginal heritage, and where these requirements are addressed in this Environmental Impact Statement, are outlined in Appendix A.

#### 9.2.1 Commonwealth

The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*, *Environment Protection and Biodiversity Conservation Act 1999*, the *Australian Heritage Council Act 2003* and the *Native Title Act 1993* provide protection for Australia's Aboriginal heritage, including:

- A National Heritage List of places of national heritage significance
- A Commonwealth Heritage List of heritage places owned or managed by the Commonwealth
- The Australian Heritage Council, an independent expert body to advise the Minister on the listing and protection of heritage places
- Management of the non-statutory Register of the National Estate.

#### 9.2.2 New South Wales

The main statutory protection of Aboriginal heritage is provided by the *National Parks and Wildlife Act 1974*. The following guidelines are relevant to the assessment of Aboriginal heritage:

- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010* (Department of Environment, Climate Change and Water, 2010b)

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage, 2011)
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Department of Environment, Climate Change and Water, 2010a)
- *The Burra Charter 2013*.

Assessment of Aboriginal heritage impacts has been carried out in accordance with the above guidelines in accordance with the Secretary's Environmental Assessment Requirements.

Other relevant legislation and plans include:

- *Aboriginal Land Rights Act 1983*
- *Native Title (New South Wales) Act 1994*
- Leichhardt Local Environmental Plan 2013
- Sydney Local Environmental Plan 2012
- *NSW Skeletal Remains: Guidelines for Management of Human Remains* (Heritage Office, 1998).

### 9.3 Assessment methodology

The Aboriginal heritage assessment comprised:

- Desktop analysis of the landscape context, local and regional character of Aboriginal land-use, and the development of a predictive model for Aboriginal site distribution
- Desktop assessment of sites registered by the Aboriginal Heritage Information Management System (AHIMS) undertaken on 26 April 2021, review of Local Environmental Plans and examination of Aboriginal cultural heritage and excavation reporting
- Archaeological surveys of the proposal construction sites carried out on 14 May 2021
- An additional site survey at Pyrmont Station and Hunter Street Station (Sydney CBD) construction sites was carried out in conjunction with a representative from the Metropolitan Local Aboriginal Land Council on 16 July 2021
- Assessment of cultural heritage significance values of Aboriginal sites in and near the study areas
- An assessment of impacts to the Aboriginal heritage significance values of any Aboriginal sites
- Consultation with Registered Aboriginal Parties
- Identification of mitigation measures to minimise adverse impacts to the heritage significance of Aboriginal sites, including archaeological investigation.

Direct impacts may occur from activities which disturb the ground surface including site preparation activities, and the installation of services and infrastructure and may result in damage, partial destruction or full destruction. Indirect impacts may affect sites or features or cultural heritage significance and include visual impacts and impacts from vibration, settlement or increased access or erosion.

Further details on the Aboriginal heritage assessment methodology are provided in Technical Paper 4 (Aboriginal cultural heritage assessment report).

#### 9.3.1 Study area

The study area for the Aboriginal heritage assessment includes:

- The area above the tunnel alignment from the proposed tunnelling work at The Bays tunnel launch and support site at the western end to the turnback in the east
- The five proposed construction sites – The Bays tunnel launch and support site, two Pyrmont Station construction sites and two Hunter Street (Sydney CBD) construction sites.

AHIMS listed Aboriginal sites which are located above the proposed tunnel alignment would be located within existing soils and ground-level sandstone outcroppings, and the horizontal tunnel excavation through sandstone bedrock would not directly impact any Aboriginal sites. Desktop assessment only has been conducted for any AHIMS registered Aboriginal sites that are located above the proposed tunnel alignment. No site inspection of sites above the tunnel alignment has been carried out. This desktop assessment includes potential vibration and settlement impacts to registered Aboriginal archaeological sites above the alignment of the proposed tunnelling work are included in this assessment.

### 9.3.2 Significance assessment

An assessment of the cultural heritage significance of items and places was carried out in order to form the basis of their management. The significance assessment was carried out in line with *The Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage, 2011) in accordance with the Burra Charter, and included the following criteria:

- **Social values** – Refers to the spiritual, traditional, historical or contemporary associations and attachments the place or area has for Aboriginal people
- **Historic values** – Refers to the associations of a place with a historically important person, event, phase or activity in an Aboriginal community
- **Scientific values** – Refers to the importance of a landscape, area, place or object because of its rarity, representativeness and the extent to which it may contribute to further understanding and information
- **Aesthetic values** – Refers to the sensory, scenic, architectural and creative aspects of the place.

Definitions of these terms are included in Technical Paper 4 (Aboriginal cultural heritage assessment report).

### 9.3.3 Consultation

Aboriginal community consultation has continued to be carried out in accordance with the requirements of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (Department of Environment, Climate Change and Water, 2010). A consultation log was maintained which details all correspondence with Registered Aboriginal Parties for the Sydney Metro West project, including for Stage 1 of the planning approval process and this proposal.

A copy of the assessment methodology for this proposal was distributed to Aboriginal stakeholders on 17 June 2021 with a 28 day period for review and comment. Seven Aboriginal stakeholder groups provided comments to the proposed investigation methodology, the details of which are provided in Table 6 of Technical Paper 4 (Aboriginal cultural heritage assessment report).

Site inspections at the Pyrmont Station and Hunter Street Station (Sydney CBD) construction sites were conducted on 16 July 2021 with a representative of the Metropolitan Local Aboriginal Land Council. The aim of the survey was to identify any non-archaeological Aboriginal values associated with the study areas. The site survey was a pedestrian survey conducted across the Pyrmont Station and Hunter Street Station (Sydney CBD) construction sites. The survey was not conducted across areas with no direct impact, such as the tunnel alignment. The results of this survey have informed Section 9.5, Section 9.8.1 and Section 9.9.1.

A copy of the Draft Aboriginal cultural heritage assessment report was distributed to Aboriginal stakeholders on 30 July 2021 with a 28 day period for review and comment. Three Aboriginal stakeholders provided comments to inform the assessment, particularly in relation to non-archaeological Aboriginal values. Information received relating to non-archaeological Aboriginal values has informed Section 9.5, Section 9.8.1 and Section 9.9.1. The details of comments received are further provided in Table 7 of Technical Paper 4 (Aboriginal cultural heritage assessment report).

As described in Chapter 4 (Stakeholder and community engagement), consultation was undertaken with the Sydney Metro Heritage Working Group, which includes representatives from the Department of Premier and Cabinet (Heritage NSW) and the Department of Planning, Industry and Environment to present an overview of this proposal, and an update on Sydney Metro West progress and planning pathways.

The significance of the cultural landscape and Aboriginal heritage cultural values, and any stakeholder feedback, will be further considered during the development of this proposal.

## 9.4 Avoidance and minimisation of impacts

The potential for Aboriginal archaeology impacts was considered throughout the design development process. This included:

- Avoiding direct impacts to previously recorded Aboriginal sites where possible
- Developing a tunnel alignment that avoids potential impacts to Aboriginal archaeological remains through excavation depths below potential archaeological resources.

## 9.5 Potential tunnelling impacts

### Existing environment

The proposal would be located in an area with substantial history of use of the land by Aboriginal people, as well as contact between Europeans and Aboriginal people in the early colony of Sydney. The identified cultural connection with the landscape, including the freshwater resources, marine resource area of Sydney Harbour, and the sandstone nature of the land within the construction sites, is recognised as part of a wider landscape representing strong cultural connection for Aboriginal people and indicates high social and historic significance.

Regarding Aboriginal cultural value, three Aboriginal stakeholders noted a strong cultural connection to the area. Particular emphasis was placed on the proximity to Sydney Harbour, as both the location of ceremonial activities and as a resource gathering place. Initiation ceremonial sites and cockle shell deposits were associated with the Sydney Harbour foreshore. The Harbour foreshore would have continued to be a gathering place for Aboriginal people until after 1788 due to its importance as a ceremonial site, highlighted by the Aboriginal stakeholders. Sacred women's sites were noted to often be associated with freshwater resources.

One Aboriginal stakeholder noted that landscapes and landforms hold specific cultural connection to Aboriginal people due to the values of respect and belonging to the Country. Several Aboriginal stakeholders noted that, with the rapid urbanisation of Sydney, many sites and significant landform features are being lost and, with that, the original sites which were associated with these stories.

AHIMS listed Aboriginal sites which have been identified as located above the proposed tunnel alignment are shown in Figure 9-1.

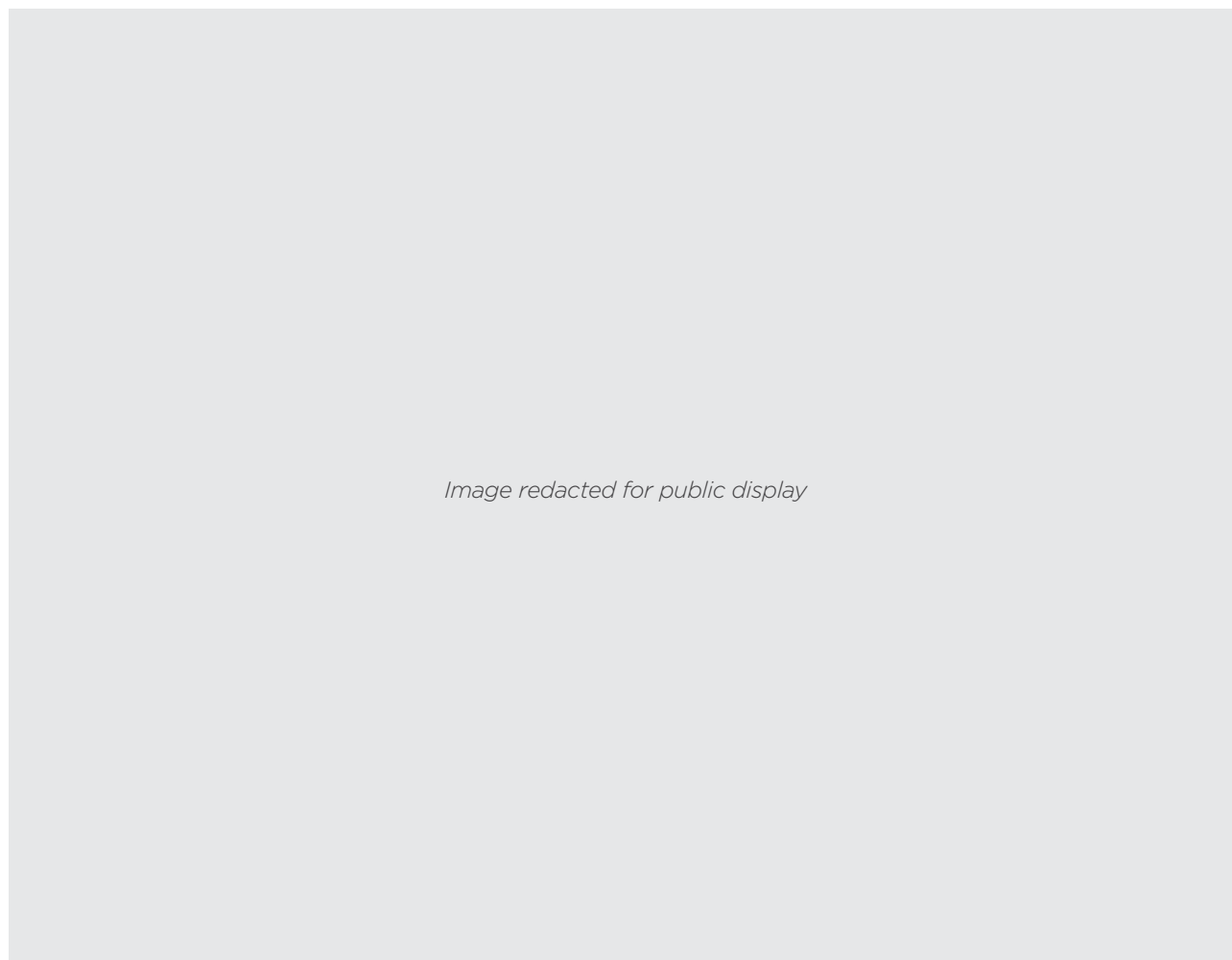


Figure 9-1 AHIMS listed Aboriginal sites located above the proposed tunnel alignment

## Potential impacts

A desktop assessment was completed for all AHIMS sites above the tunnel alignment (refer to Table 9-1). This assessment was limited to the potential for indirect impact associated with possible vibration impacts due to the overall depth of tunnelling.

Table 9-1 Summary of registered AHIMS sites along the tunnel alignment

Site/ AHIMS ID	Site type	Location	Status	Potential impact
<b>The Bays Precinct PAD 02 (AHIMS ID 45-6-3338)</b>	Potential Archaeological Deposit (PAD)	Directly above tunnel alignment	Valid	The tunnel alignment would be located about 45 metres below the AHIMS registered site. It is predicted that the proposal has the potential to result in negligible settlement impacts.
<b>Jackson's Landing PAD (AHIMS ID 45-6-2960)</b>	Rockshelter with PAD	Directly above tunnel alignment	Valid	The tunnel alignment would be located about 45 metres below the AHIMS registered site. It is predicted that the proposal has the potential to result in negligible settlement impacts.
<b>Wynyard Walk PAD (AHIMS ID 45-6-3116)</b>	PAD	Directly above tunnel alignment	Destroyed	The tunnel alignment would be located about 40 metres below the site. In addition, the site is registered as destroyed, and there would be no impacts to this site.
<b>RBG PAD 1 (AHIMS ID 45-6-3324)</b>	PAD	Directly above tunnel alignment	Valid	The tunnel alignment would be located about 50 metres below the AHIMS registered site. It is predicted that the proposal has the potential to result negligible settlement impacts. This would not likely result in damage to, or significant stratigraphic displacement of, any Aboriginal objects and potential impacts would be negligible.

## 9.6 Potential power supply route impacts

### Existing environment

No AHIMS sites were identified along the alignment of the Pyrmont Station power supply route. Trenching work associated with the power supply route would be within the existing road corridors of Pyrmont Bridge Road and Harris Street. Trenches are expected to be between one and two metres deep. As a result, it is likely that if any intact archaeological deposits remain below the road surface, they would be impacted by the trenching work.

### Potential impacts

Previous construction of kerbs and guttering is likely to have removed much of the soil surface. In addition, the power supply route would not be located near indicators of sub-surface Aboriginal archaeological remains, such as watercourses or shelters in the rock face of the local sandstone. As a result, the power supply route is not considered to have potential to impact on an Aboriginal archaeological site.

## 9.7 The Bays tunnel launch and support site

### 9.7.1 Existing environment

The *Sydney Metro West Environmental Impact Statement – Westmead to The Bays and Sydney CBD* (Sydney Metro, 2020a) assessed the impacts of The Bays Station construction site to:

- Carry out the excavation of The Bays Station
- Launch and support two tunnel boring machines for the drive west to the Sydney Olympic Park metro station construction site.

The Bays Station construction site is being established under the Sydney Metro West Concept and Stage 1 planning approval.

The Bays tunnel launch and support site in this proposal would be located within a part of The Bays Station construction site. The impacts of the proposed use of The Bays tunnel launch and support site are assessed below. There is one Potential Archaeological Deposit (PAD) located directly adjacent to The Bays Station construction site, which was identified during the site investigation carried out for Stage 1 of the planning approval process for Sydney Metro West and registered on AHIMS. A review of registered AHIMS sites conducted on 26 April 2021 did not identify any other AHIMS registered sites within 200 metres of The Bays tunnel launch and support site. No site survey was conducted for this proposal, given the establishment of The Bays Station construction site.

### 9.7.2 Potential impacts

This Environmental Impact Statement only assesses the proposed use of the eastern and southern part of The Bays Station construction site to launch and support two tunnel boring machines for the drive east to the proposed Hunter Street Station (Sydney CBD) construction sites. The use of The Bays tunnel launch and support site is not anticipated to result in any impacts on Aboriginal heritage. Any unexpected finds would be managed in accordance with the Sydney Metro Unexpected Finds Procedure.

## 9.8 Pyrmont Station construction site

### 9.8.1 Existing environment

The closest known freshwater sources to the Pyrmont Station construction sites would have been the upper reaches of Cockle Creek and Blackwattle Creek or freshwater springs such as Tinkers well.

The Pyrmont Station western construction site would be located within the broad ridgeline which runs south-east to north-west along the Pyrmont Peninsula. At the closest point, the Pyrmont Station construction sites would be located approximately 150 metres east of the former foreshore of Blackwattle Bay. Due to the existing buildings on site, including the original basement excavation for car parking, the northern portion of this construction site has no remnant natural soils conserved and no Aboriginal archaeological potential is predicted at this location. The southern portion of the site has been developed several times since European settlement, including the construction of a series of Terrace houses across the site between 1883 and 1915. The southern building currently extant across the site was identified as beginning in the later 1940s resulting in the complete demolition of the earlier terrace structures. The construction of earlier terrace houses on the former sandy soils of the lower slope of a local ridgeline in Pyrmont would likely have removed much of the former soil surface, with deeper soils likely disturbed from construction and use of the historical properties.

The eastern construction site would be located within a slope landform which transitioned the foreshore towards the broad ridgeline which runs south-east to north-west along the Pyrmont Peninsula. The north-western portion of the site contains ground which is not likely to have been removed during the building's original basement excavation. However, historic terrace housing would have required some landscape modification due to the moderate ground slope.

There are no AHIMS registered sites within 200 metres of the Pyrmont Station construction sites. The closest registered AHIMS site to the construction site is approximately 270 metres west of the western construction site within the former foreshore of Blackwattle Bay.

### Aboriginal sites recorded during investigations

No areas of surface visibility were observed during field investigations.

### 9.8.2 Potential impacts

No known Aboriginal sites would be impacted by the proposed work at the Pyrmont Station construction sites.

The likelihood of intact artefacts bearing archaeological deposits is considered to be nil due to the landscape context and largely modified nature of the Pyrmont Station construction sites and surrounding area. The scientific significance of the construction sites is low. There are not expected to be any potential impacts to Aboriginal objects.



## 9.9 Hunter Street Station (Sydney CBD) construction site

### 9.9.1 Existing environment

The Hunter Street Station (Sydney CBD) western construction site would be located across a very gentle slope rising west along Hunter Street and sloping down along George Street. The entire construction site has had previous extensive ground surface modification. Extensive subsurface excavation is evident with retail premises and basement level car parks located beneath the construction site. The western construction site would encompass the original alignment of the Tank Stream, which served as the Sydney CBD's main watercourse for both Aboriginal communities pre-European contact and the fledgling Sydney colony. The portion of the Tank Stream within the western construction site, however, was replaced with a modern concrete and steel drain in the second half of the twentieth century, as described in Chapter 8 (Non-Aboriginal heritage).

One Aboriginal stakeholder noted that Elizabeth Street, east of the study area, was used as a track through the landscape for Aboriginal people both before 1788 and immediately after contact. The freshwater resources along this track (partly within the wider Tank Stream catchment) were highlighted as important resources for Aboriginal people. The area of the early Sydney colony, encompassing the study areas, was noted to have connection with the figures of Bennelong and Barangaroo. Barangaroo in particular was noted due to the presence of the Tank Stream in close proximity to the study area and the connection of freshwater with women's sites.

The Hunter Street Station (Sydney CBD) eastern construction site would be located across a gentle to moderate slope rising to the east. It would be located across a built environment which currently comprises three office blocks located along Hunter Street, and a temporary acoustic shed within the northern portion of the construction site. All existing buildings within the Hunter Street Station (Sydney CBD) eastern construction site are known to possess deep basements which encompass the entirety of their building footprints. All former soil deposits are expected to have been removed. In the absence of any residual soil deposits there are no predicted areas of Aboriginal archaeological potential within the Hunter Street Station (Sydney CBD) eastern construction site.

AHIMS site 45-6-2796 is registered at the Hunter Street Station (Sydney CBD) western construction site. AHIMS site card information indicates that the location data displayed on the AHIMS register has been inaccurately recorded. AHIMS site 45-6-2796 is considered to be located outside of the Hunter Street Station (Sydney CBD) western construction site. One Aboriginal stone artefact was identified during historical archaeological excavation carried out on the site. This stone artefact was recovered from a redeposited soil layer within the historical archaeological contexts of that site.

#### Aboriginal sites recorded during investigations

No areas of surface visibility were observed during field investigations.

### 9.9.2 Potential impacts

The likelihood of intact artefact-bearing archaeological deposits is considered to be low for the Hunter Street Station (Sydney CBD) western construction site. Any Aboriginal objects that might be located within the majority of the Hunter Street Station (Sydney CBD) western construction site are likely to be within a disturbed context and would therefore be considered to be of low archaeological significance. However, if buried landforms associated with the Tank Stream were located in the Hunter Street Station (Sydney CBD) western construction site, they would have a high research potential and high significance as Aboriginal objects may be present and would be rare in the context of the urban landscape of the former Tank Stream valley.

Due to the landscape context and largely modified nature of the Hunter Street Station (Sydney CBD) eastern construction site and surrounding area, the likelihood of intact artefact bearing archaeological deposits is considered to be nil. The Hunter Street Station (Sydney CBD) eastern construction site is considered to be of low scientific significance.

## 9.10 Cumulative impacts

Potential cumulative impacts were considered for assessment based on the likely interactions of the proposal with other projects that met the adopted screening criteria. The approach to assessment and the other projects considered are described further in Appendix G (Cumulative impacts assessment methodology).

Registered Aboriginal stakeholders noted that the history of urbanisation of Sydney has and continues to result in the modification of the natural landform and, with this, a cumulative loss of associated Aboriginal heritage sites.

Given the limited impacts of the proposal to Aboriginal cultural heritage, no cumulative Aboriginal heritage impacts are identified at The Bays tunnel launch and support site, Pyrmont Station construction sites or along the tunnel alignment. As there is a low potential for encountering subsurface Aboriginal objects at the Hunter Street Station (Sydney CBD) western construction site, further assessment of sensitive areas and possible Aboriginal archaeological excavation of areas may be carried out at Hunter Street Station (Sydney CBD) western construction site to minimise potential cumulative impacts.

## 9.11 Mitigation and management measures

Sydney Metro is piloting the Connect with Country Framework with the Office of Government Architect. Sydney Metro recognises knowledge holders consider the proposal would have an impact on Aboriginal Country. The aim of this pilot is to recognise Aboriginal values into the planning, assessment and development process.

The Construction Environmental Management Framework (Appendix C) describes the approach to environmental management, monitoring and reporting during construction. Specifically, it lists the requirements to be addressed by the construction contractor in developing the Construction Environmental Management Plans, sub-plans, and other supporting documentation for each specific environmental aspect. This includes standard mitigation measures, including the preparation of a Heritage Management Plan.

The environmental management approach for the project is detailed in Chapter 23 (Synthesis of the Environmental Impact Statement). Under these broad frameworks and as outlined within the Concept assessment, a series of performance outcomes have been developed to define the minimum environmental standards that would be achieved during construction of the proposal (see Section 9.11.2), and mitigation measures that would be implemented during construction to manage potential identified impacts (see Section 9.11.4).

The environmental management approach for this proposal has also considered the relevant Conditions of Approval for the Sydney Metro West Concept, to ensure that this proposal would be carried out in accordance with these conditions.

### 9.11.1 Concept Conditions of Approval

The Conditions of Approval for the Sydney Metro West Concept were received on 11 March 2021. The Concept Conditions of Approval that relate to Aboriginal heritage are presented in Table 9-2, along with consideration of their relevance to this proposal.

Table 9-2 Concept Conditions of Approval - Aboriginal heritage

Reference	Condition	Relevance to this proposal
C-B4	The relevant future stage application relating to the design of stations must include a Heritage Interpretation Strategy, prepared in consultation with Heritage NSW, which outlines how key Aboriginal and non-Aboriginal heritage values and stories of Heritage items will be interpreted in the project design, including station and precinct urban design. The Heritage Interpretation Strategy must include procedures for how to include results of archaeological findings (historical and Aboriginal archaeological results) when they become available.	Not relevant – This proposal does not include station design. The Heritage Interpretation Strategy will be prepared as part of the future planning applications for Sydney Metro West. However, any archaeological results as a result of unexpected finds during construction of this proposal would be considered in implementation of the Heritage Interpretation Strategy.

Reference	Condition	Relevance to this proposal
C-B5	The Heritage Interpretation Strategy must be prepared in accordance with the NSW Heritage Manual, the NSW Heritage Office's Interpreting Heritage Places and Items: Guidelines (August 2005), and the NSW Heritage Council's Heritage Interpretation Policy.	Not relevant – This proposal does not include station design. The Heritage Interpretation Strategy will be prepared as part of the future planning applications for Sydney Metro West.
C-B6	The Heritage Interpretation Strategy must include, but not be limited to: <ul style="list-style-type: none"> <li>a. A discussion of key interpretive themes, stories and messages proposed to interpret the history and significance of archaeological excavation, the affected Heritage items and sections of heritage conservation areas (if applicable);</li> <li>b. Options for the re-purposing of archaeological finds (results and artefacts), heritage features or listed items salvaged or protected during construction stages of the CSSI, and how they will be integrated into the final project design;</li> <li>c. Aboriginal cultural and heritage values of the project area including the results of any archaeological investigations undertaken (or any interim results of any archaeological investigations that have commenced but have yet to be completed) and key socio-cultural values identified in the Aboriginal Cultural Heritage Assessment Report referred to in Condition C-A1 of this schedule, and those of any future stages of the CSSI;</li> <li>d. Details of the audience, potential devices to be employed in interpretation, possible locations for interpretation and how this will be incorporated into design;</li> <li>e. Engagement with the Relevant Council(s) and regard for any relevant council heritage interpretation guidelines; and</li> <li>f. With respect to the Parramatta construction site and (a) above, any discussion must include how the heritage interpretation of the CSSI relates to the heritage interpretations of other projects in Parramatta, including State Significant Development projects and other SSI projects.</li> </ul>	Not relevant – This proposal does not include station design. The Heritage Interpretation Strategy will be prepared as part of the future planning applications for Sydney Metro West.

### 9.11.2 Performance outcomes

Construction performance outcomes were developed for the proposal as part of the Concept assessment. Performance outcomes for the proposal identify measurable, performance-based standards for environmental management. Identified performance outcomes in relation to Aboriginal heritage for construction of the proposal include:

- Impacts on areas of moderate or higher archaeological potential and significance are avoided or minimised, where feasible and reasonable
- Accidental impacts to heritage items are avoided.

Chapter 23 (Synthesis of the Environmental Impact Statement) describes how the proposal addresses these performance outcomes. Due to the landscape context and largely modified nature of the construction sites and surrounding area, the likelihood of intact artefact bearing archaeological deposits is considered to be low. If unexpected Aboriginal objects are identified during construction work, the unexpected finds procedure or appropriate archaeological management approach would be implemented.

### 9.11.3 Archaeological management

To assist with implementation of any potential archaeological excavation and unexpected finds, the Pyrmont Station and Hunter Street Station (Sydney CBD) construction sites have been categorised into method areas based on archaeological potential (refer to Table 9-3), consistent with the methodology applied in *Sydney Metro West Environmental Impact Statement – Westmead to The Bays and Sydney CBD* (Sydney Metro, 2020a). Each method area has a specific trigger that, if met, would require a specific archaeological management approach. Further information regarding the method areas and approach to potential archaeological test excavation is provided in Chapter 12 of Technical Paper 4 (Aboriginal Cultural Heritage Assessment Report).

Table 9-3 Archaeological management approach for each construction site

Construction site	Method Area	Trigger	Archaeological management approach
<b>Pyrmont Station western construction site</b>	Method area 1	Aboriginal object(s) identified as an unexpected find	Unexpected finds procedure
<b>Pyrmont Station eastern construction site</b>	Method area 1	Aboriginal object(s) identified as an unexpected find	Unexpected finds procedure
<b>Hunter Street Station (Sydney CBD) western construction site</b>	Method area 2	<ul style="list-style-type: none"> <li>Aboriginal object(s) identified as an unexpected find or</li> <li>Intact remnant soil profiles associated with the Gymea soil body or the Tank Stream sedimentary soils</li> </ul>	Assessment by the Aboriginal archaeological Excavation Director, resulting in management that may include: <ul style="list-style-type: none"> <li>Site and stage specific Archaeological Method Statements</li> <li>Test/ salvage excavation required if intact natural soil profiles are located during work</li> <li>Unexpected finds procedure (in areas where no excavations are triggered)</li> </ul>
<b>Hunter Street Station (Sydney CBD) eastern construction site</b>	Method area 1	Aboriginal object(s) identified as an unexpected find	Unexpected finds procedure

### 9.11.4 Mitigation measures

The mitigations measures that would be implemented to address potential Aboriginal heritage impacts are described in Table 9-4.

Table 9-4 Mitigation measures – Aboriginal heritage

Reference	Impact	Mitigation measure	Applicable location(s)
<b>AH1</b>	Consultation	Aboriginal stakeholder consultation for this proposal should continue based on initial consultation originally commenced on major construction work between Westmead and The Bays (Stage 1 of the planning approval process for Sydney Metro West) in accordance with the <i>NSW Office of Environment and Heritage's Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> . Additional consultation with knowledge holders about the project would be undertaken where possible.	All
<b>AH2</b>	Unexpected finds	If suspected human skeletal remains are uncovered at any time during the proposed work, procedures outlined in the Sydney Metro Exhumation Management Plan, the Sydney Metro Unexpected Heritage Finds Procedure and Heritage Management Plan would be implemented.	All
<b>AH3</b>	Unexpected finds	If unexpected Aboriginal objects are identified during construction work, the Sydney Metro Unexpected Finds Procedure would be implemented.	All

Reference	Impact	Mitigation measure	Applicable location(s)
AH4	Cultural values	In recognition of potential impacts to the Aboriginal cultural values of the project area, the line-wide Heritage Interpretation Strategy for Sydney Metro West would address Aboriginal cultural values and be prepared in consultation with the local Aboriginal community, knowledge holders and with reference to the Connecting with Country framework.	All
AH5	Intact deposits or Aboriginal objects in Method Area 2	As the Hunter Street Station (Sydney CBD) western construction site has been assessed as having the potential for intact deposits, a stage specific Archaeological Method Statement would be prepared prior to work commencing. The Archaeological Method Statement would adhere to the archaeological management measures for Method Area 2 as outlined in Technical Paper 4 (Aboriginal Cultural Heritage Assessment Report).	Hunter Street Station (Sydney CBD) western construction site

#### 9.11.5 Interactions between mitigation measures

There are no mitigation measures in other chapters that are directly relevant to the management of Aboriginal heritage impacts.

There are no mitigation measures identified in the assessment of other environmental aspects that are likely to affect the assessment of Aboriginal heritage impacts.

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