



Office of Environment & Heritage

DOC19/349603
SSD 8699

Ms Karen Harragon
A/Executive Director Priority Projects
NSW Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Ms Harragon

Redevelopment of Greenwich Hospital (SSD 8699) - Aboriginal cultural heritage

I refer to your email of 15 April 2019 received by the Office of Environment and Heritage (OEH) requesting comments on the Aboriginal cultural heritage assessment for the redevelopment of Greenwich Hospital at 97-115 River Road, Greenwich.

OEH has reviewed the Aboriginal Cultural Heritage Assessment Report (ACHAR) and accompanying Archaeological Technical Report by Cultural Heritage Connections (CHC 2018) and provides comments in the Attachment.

In summary, OEH advises that further assessment, including subsurface archaeological testing, should be completed in the area of archaeological potential mapped along the eastern side of the project area at an early stage of the project and prior to any ground disturbing impacts. Early assessment is recommended to ensure that impacts to Aboriginal cultural heritage are known and appropriate management strategies can be developed. This area was identified as having potential due to the presence of rock overhangs and has been recorded as less disturbed compared to the remainder of the project area. CHC has determined that the remainder of the project area is located at the top of a high gradient slope and is therefore unlikely to preserve intact archaeological deposits. The construction of the existing hospital and Pallister house and grounds would have also caused disturbance to any archaeological deposit located in these areas.

OEH recommends that a comprehensive Aboriginal Heritage Management Plan (AHMP) be developed and approved by the Secretary prior to any ground disturbing works commencing. This AHMP should include management and mitigation strategies for any identified Aboriginal objects. OEH recommends that subsurface test excavation in the area of archaeological potential is completed prior to the development of the AHMP and informs any necessary management and mitigation strategies.

If you have any queries regarding this matter, please contact Marnie Stewart on 9995 6868 or marnie.stewart@environment.nsw.gov.au

Your sincerely

S. Harrison 23/04/19

SUSAN HARRISON
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Office of Environment and Heritage comments – Redevelopment of Greenwich Hospital (SSD 8699)

Archaeological potential of the study area

No Aboriginal objects have been recorded in the study area, however, the potential for objects to be present has been noted, particularly in the eastern portion of the project area. The potential for archaeological deposit in rock overhangs that were not able to be accessed during the survey has specifically been recorded. The visibility at the time of the survey was also noted to be low. OEH supports the CHC recommendations to complete additional survey of the project area if access to areas of rock overhangs is improved. An AHMP could guide this process.

Archaeological testing is recommended prior to any ground disturbing impacts

OEH advises that further assessment, including subsurface archaeological testing, should be completed in the area of archaeological potential along the eastern side of the project area at an early stage of the project and prior to any ground disturbing impacts.

It is important to undertake archaeological testing at an early stage of the project to determine if harm to Aboriginal objects is likely to occur. It is recommended that any testing is undertaken prior to the development of an AHMP. The results of the testing could inform the management and mitigation strategies outlined in the AHMP. Only those areas of potential that are proposed to be subject to harm should be tested.

An AHMP should be developed

OEH does not support the current unexpected finds procedure provided in the ACHAR. Instead, a comprehensive AHMP should be developed, in consultation with the registered Aboriginal parties, (RAPs) to guide management and mitigation measures. The unexpected finds procedure in the ACHAR also recommends completing excavation if *in situ* deposit are identified during works. OEH recommends that testing of any areas of identified deposit should be completed prior to salvage excavation to inform of the nature and significance of the deposit.

OEH recommends that the AHMP include, but not be limited to, the following provisions:

- a) Is prepared by a suitably qualified and experienced person whose appointment has been endorsed by the Secretary;
- b) Is prepared in consultation with registered Aboriginal parties;
- c) Includes a description of the measures that would be implemented for:
 - minimising ground disturbance within the project area during construction and any ground disturbing works;
 - minimising and managing impacts to Aboriginal objects identified in the project area including:
 - developing a program for ongoing monitoring if Aboriginal objects will be indirectly harmed;
 - undertaking salvage where impacts cannot be avoided (if required and following the results of archaeological testing); and
 - a strategy for the long-term management of any Aboriginal objects recovered from any salvage works;
 - a contingency plan and reporting procedure if:
 - previously unidentified Aboriginal objects are found; or
 - Aboriginal skeletal material is discovered;
 - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that suitable records are kept of these inductions; and

- ongoing consultation with registered Aboriginal parties during the implementation of the plan;
- d) a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.

Suggested edits to the consultation sections of the ACHAR

The consultation section of the ACHAR includes incorrect or contradicting information and should be revised.

The ACHAR states that 17 RAPs registered an interest in the project, however only 15 groups have been listed in the ACHAR. It also appears the Deerubbin Local Aboriginal Land Council (LALC) was advised of the RAPs for the project, rather than Metropolitan LALC which is the relevant LALC for this site (refer to pg. 21 of the ACHAR). These matters should be clarified.

A submission from Corroboree Aboriginal Corporation, included in Appendix 2 of the ACHAR, indicates that they would prefer if their submission and their details are not passed on to OEH or the LALC. The submission should be redacted in future versions of the report. This group is also not listed as a RAP in the ACHAR. It should be clarified if all required consultation documentation was provided to this group.