

16 December 2019

Department of Planning, Industry and Environment
Environment, Energy and Science – Greater Sydney Branch
PO Box 644
Parramatta NSW 2124

Attention: Marnie Stewart (A/Senior Team Leader Planning)

**Re: EES comments on Aboriginal Cultural Heritage Assessment Report
for Light Horse Interchange Business Hub – SSD-9667**

Dear Marnie,

We understand that an Environmental Impact Statement (EIS) was recently submitted to the Department of Planning and Environment (DPE) regarding the redevelopment of the Light Horse Interchange Business Hub (SSD-9667). As part of this process, the Environment, Energy and Science (EES) – Greater Sydney Branch of the Department of Planning, Industry and Environment (DPIE) has provided comments in relation to the management of Aboriginal heritage. Whilst DPIE are generally supportive of our proposed approach, including ongoing consultation and the preparation of an Aboriginal Cultural Heritage Management Plan, the absence of archaeological test excavations to inform the development was noted as a key constraint.

Since its completion in March 2019, the ACHAR has progressed significantly to address DPIE's concerns; notably with regards to archaeological test excavation of the study area in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010). The finalised ACHAR is appended to this document, and briefly summarised below.

Specifically, the excavations demonstrated the presence of two source-bordering alluvial terraces along Eskdale and Eastern Creek, within which discrete ~100m² patches formed key locales of Aboriginal visitation and occupation over the last 4,000 years (Figure 1 and Figure 2). The nature of the cultural assemblage suggests intense but short-lived occupation, with a focus on the exploitation of locally available stone resources for artefact and tool production. Certain raw lithic material improvement strategies, in the form of heat treatment, were also employed on site and both sites are considered of high archaeological significance.

In contrast, the remainder of the study area is dominated by a low-density distribution of cultural material (<10 artefacts) in the form of small artefact scatter sites and isolated artefacts (several of which have been previously registered on the AHIMS database), and ultimately reflects an ephemeral or transient use of the wider area in the past. Such sites have limited research

potential (typically restricted to only the technological attributes of the artefact assemblage), limited stratigraphic integrity, and are representative of other sites in the south western Cumberland Plain; and as such are considered of low archaeological significance.

A review of the proposed development design indicates that considerable impacts would occur to the Eskdale Creek alluvial terrace landform and the low-density background scatter present within the site. A management strategy and recommendations to address these impacts has been provided, which includes archaeological salvage of up to 100m² of the Eskdale Creek alluvial terrace deposit, in the vicinity of TP151. To provide the post-approval framework for the management of the archaeological and cultural resource of the study area, an Aboriginal Cultural Heritage Management Plan (ACHMP) is recommended, to be prepared in consultation with the proponent, Registered Aboriginal Parties and DPIE.

We further note that proponents of State Significant Development (SSD) projects are not required to seek Aboriginal Heritage Impact Permits, and that the management of the Aboriginal cultural heritage resource should be guided by an ACHMP, and in accordance with the Minister's Conditions of Approval for the project.

We note DPIE's recommendations regarding the curation and long-term management of the Aboriginal objects recovered within the project area. Ultimately, the long-term curation of Aboriginal objects would depend on the nature and significance of the assemblage recovered (including any salvage excavations), and would be developed as part of the proposed ACHMP, in consultation with the RAPs.

If you wish to discuss further, I can be contacted on (02) 9555 4000 or LBarry@extent.com.au.

Yours Sincerely,



Laressa Barry
Senior Heritage Advisor | Extent Heritage

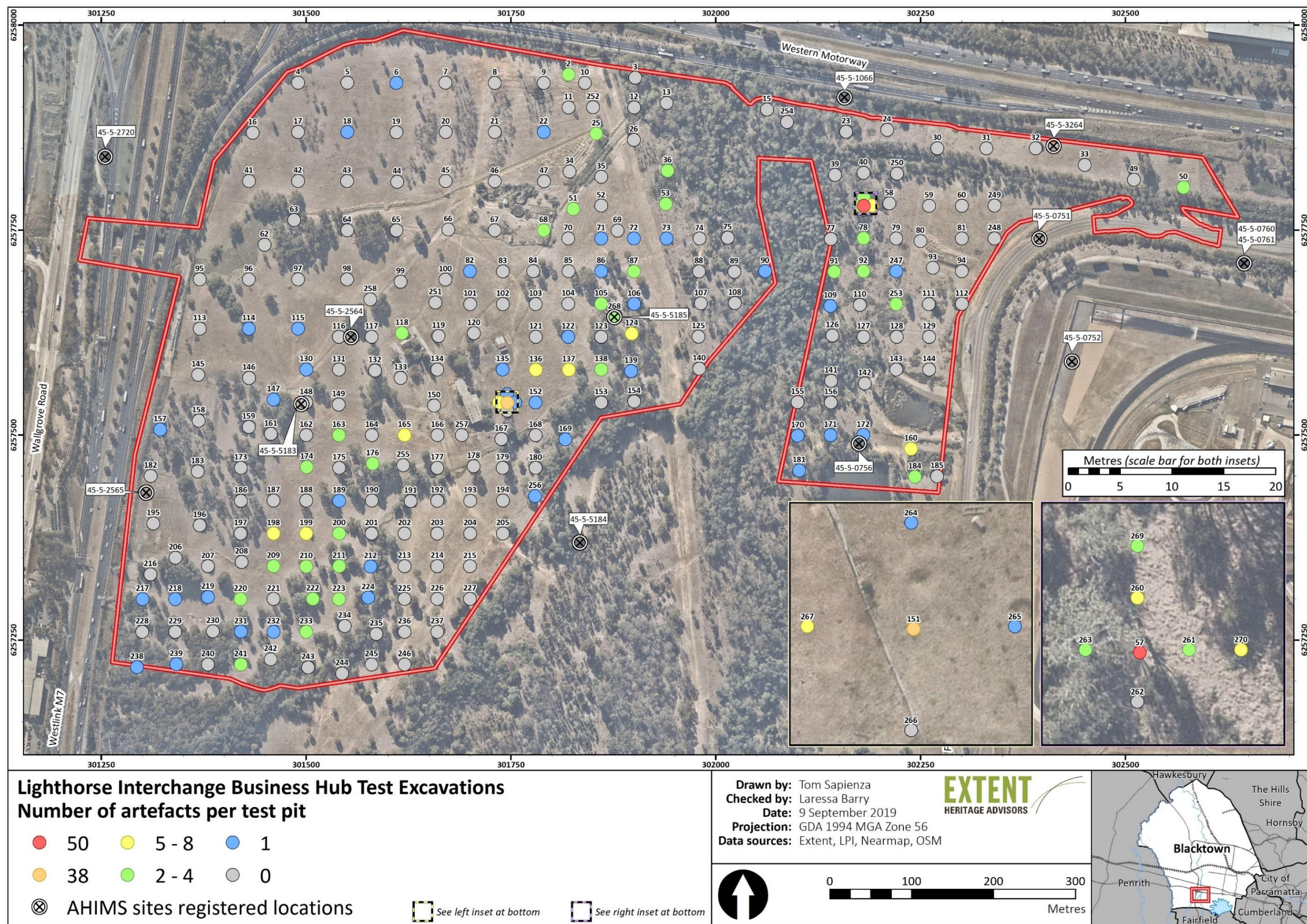


Figure 1. Summary of the cultural assemblage (number of artefacts) recovered from the test excavation program, as well as locations of previously registered AHIMS sites.

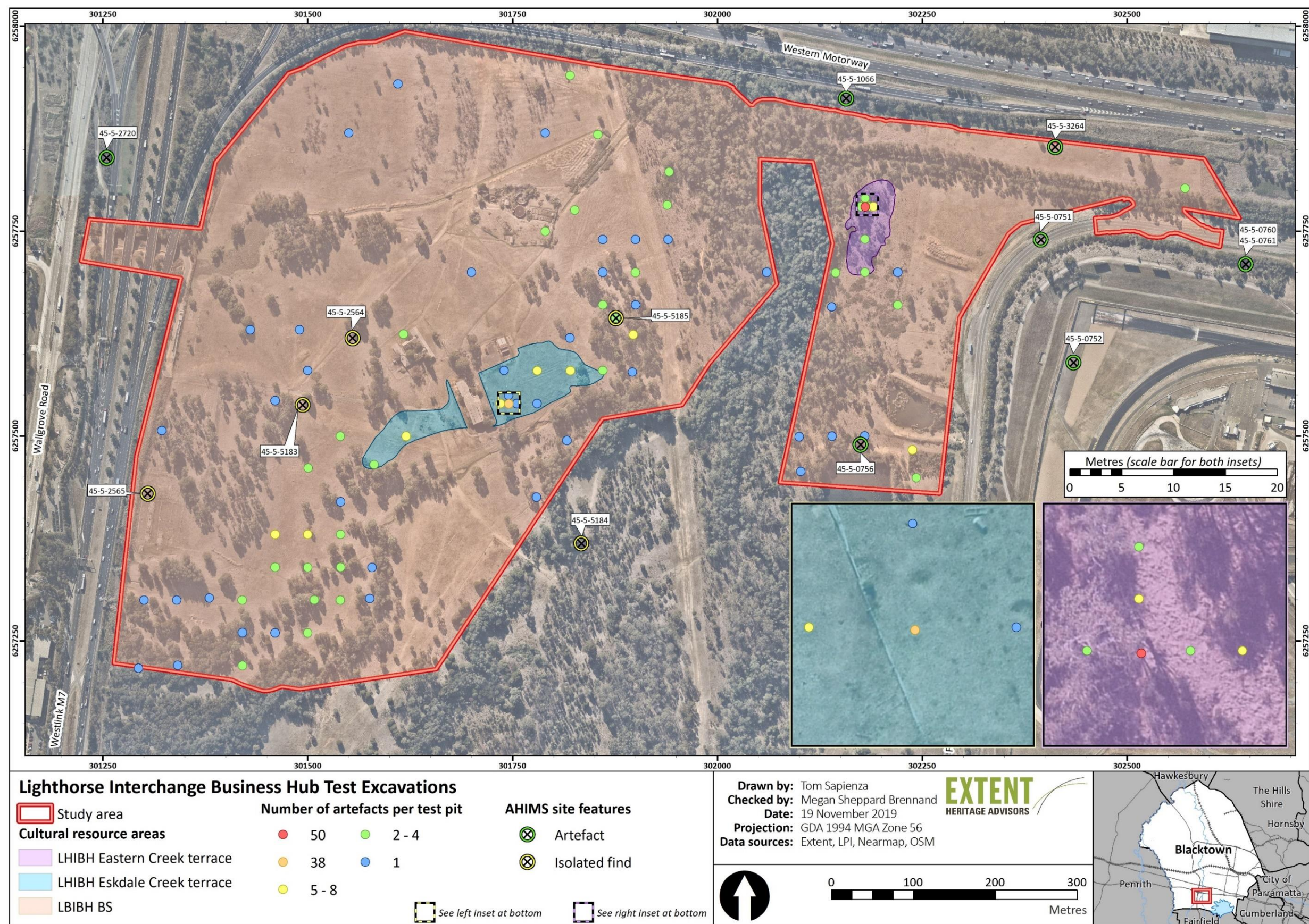


Figure 2. Summary of Aboriginal archaeological material recovered during excavation. Note, two elevated terrace landforms 'Eskdale Creek terrace' and 'Eastern Creek terrace' were identified (respectively, blue and purple shading), within which discrete ~100m² patches of high density material (inset, around TP151 and TP57) were recovered, and formed foci of Aboriginal occupation.