



DOC19/917937
SSI 9364

Ms Naomi Moss
Senior Planner
Transport Assessments
Department of Planning, Industry and Environment
GPO Box 39
SYDNEY NSW 2000

Dear Ms ~~Moss~~, *Naomi*

Re: Request for advice on M12 Motorway (SSI 9364)

I refer to the 21 November 2019 Environment, Energy and Science (EES) Group advice on the Environmental Impact Statement for the above proposal.

The EES Group has now reviewed the Aboriginal Cultural Heritage Assessment Report (ACHAR) and provides the following advice.

Consultation with the Aboriginal community is considered adequate

EES Group notes the documented responses from the registered Aboriginal parties (RAPs) is supportive of the project and the methods used in the ACHAR. A number of key themes were raised by several of the RAPs that highlight the cultural values for parts of the project area including cultural statements about stone artefacts (objects) revealed during the field survey and notably, artefacts discovered during the test excavations.

The cultural values assessment describes intangible cultural themes identified by the RAPs which they wish to translate into interpretive cultural products to raise awareness of Aboriginal cultural heritage to a wider audience particularly, for visitors alighting from airport destinations. EES Group supports this enterprise.

The RAPs have also documented requests for skill training opportunities to better understand artefact analysis. EES Group supports the inclusion of training opportunities that empower Aboriginal people with additional skill sets.

The assessment of Aboriginal Cultural Heritage values is considered adequate

The ACHAR, supported by a test archaeological excavation, Aboriginal consultation and literature review, has adequately identified the direct and potential threats to sites within the project footprint. EES notes the number of Aboriginal sites at direct threat and the descriptive characteristics of each, further noting that a number of sites will not be harmed including three areas identified as culturally significant by the RAPs.

EES accepts the assessment undertaken particularly the application of the methods used, the inclusiveness of Aboriginal view points, and the scientific and cultural interpretation of assessment findings. EES notes that the scale of construction works will have significant impacts to cultural heritage values.

The proposed mitigation and avoidance measures are considered justified and adequate

EES notes the proposed salvage excavations that form part of the ACHAR recommendations to mitigate harm, including the recommended salvage of high numbers of stone artefacts for analysis. The ACHAR also argues for opportunities to date archaeological material during excavation and documents the RAPs request for residue analysis and research of the artefacts sourced from red silcrete which are reported to have cultural meaning. The combination of cultural and scientific objectives for a lithic analysis carries a creditable argument and EES supports the research proposal.

EES accepts the proposed mitigation measures are proportionate to the degree of cultural and scientific harm by the project to significant Aboriginal cultural heritage values and these mitigation measures should be required as conditions of consent.

Should you have any queries regarding this advice, please contact Richard Bonner, Senior Conservation Planning Officer on 9995 6917 or richard.bonner@environment.nsw.gov.au

Yours sincerely

Handwritten signature of S. Harrison and the date 12/12/19.

Susan Harrison

Senior Team Leader Planning

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Climate Change and Sustainability