



Our ref: DOC20/696728

Mr Bruce Zhang
Senior Environmental Assessment Officer
Industry Assessments
Department of Planning, Industry and Environment

By email: bruce.zhang@environment.nsw.gov.au

Dear Bruce

Advice regarding Amendments to Environmental Impact Statement – State Significant Development – Kariong Sand and Soil Supplies Facility – Central Coast LGA (SSD – 8660)

I refer to your email dated 26 August 2020, seeking comment from Heritage NSW (HNSW) on amendments made to the Environmental Impact Statement (EIS) prepared by Jackson Environment and Planning 2020, for the proposed Kariong Sand and Soil Supplies Facility (SSD 8660), located at 90 Gindurra Road, Somesby (Lot 4 DP 227279), Central Coast Local Government Area.

The Office of Environment and Heritage (OEH) previously provided comments on this proposal on 5 April 2019 (DOC19/76562-11), at which time it was advised that the EIS did not adequately address the SEARs issued for the project, by failing to provide an adequate level of assessment of the Aboriginal cultural heritage values of the project area.

As the office now responsible for the regulation of Aboriginal cultural heritage, Heritage NSW (HNSW) of the Department of Premier and Cabinet (DPC) have reviewed the additional information supplied including the EIS (Jackson Environment and Planning 2020); and the Aboriginal Cultural Heritage Assessment Report (ACHAR) and Archaeological Report (AR), prepared by Biosis (dated 9 July 2020), and have determined that the new information sufficiently address the issues raised in the previous comments. HNSW make the following additional recommendations.

An Aboriginal Cultural Heritage Management Plan (ACHMP) should be prepared in consultation with the Registered Aboriginal Parties (RAPs) and HNSW, to ensure any potential or newly identified Aboriginal sites located within the project area are appropriately managed and mitigated as required. The ACHMP must include procedures for implementing the recommendation to fence the boundary of Lot 4 DP 227279 (ACHAR 2020: 29-30) to minimise potential impacts to the Aboriginal cultural heritage values identified in proximity to the project area. HNSW recommends that an ACHMP be prepared and approved as a Condition of Consent, prior to any ground surface disturbance works being undertaken.

HNSW has reviewed the results of the field survey undertaken with the RAPs and noted the results were inconclusive as the effective coverage in the southern half of the project area was 0% due to heavy vegetation. The AR argues that the low-lying ground in the southern half of

the project area precludes Aboriginal occupation in this part of the project area (AR 2020:33) and the likelihood of Aboriginal objects in this area is low. The extensive archaeological record and the significant Aboriginal cultural values of the immediate area and broader Somersby locality do not support this assumption. HNSW is of the view that the identification of potential Aboriginal sites being present in this part of the project area was prevented due to a lack of visibility. HNSW recommends that survey of the southern half of the project area should occur following surface removal of vegetation. Procedures for vegetation removal must be prepared and included in the ACHMP.

Any Aboriginal sites or objects identified during the survey must be managed in accordance with the protocols for newly identified sites in the ACHMP. An unexpected finds protocol should be prepared and included in the ACHMP to manage and mitigate impacts to any potential or newly identified Aboriginal sites following vegetation removal for survey and development-related ground disturbing works.

If you have any questions regarding the above advice, please contact Rebecca Yit, Archaeologist at Heritage NSW, on 4927 3244 or rebecca.yit@environment.nsw.gov.au

Yours sincerely



Dr Samantha Higgs
Senior Team Leader
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Date: 24 September 2020