



Our ref: DOC20/872025
Your ref: SSD-10290

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Advice provided via the Major Project Portal

Dear Mr Gotsis

Notice of Exhibition – Redevelopment of Bankstown North Public School, 322 Hume Highway, Bankstown (SSD 10290)

Thank you for your referral dated 23 October 2020 inviting comment from Heritage NSW on the Notice of Exhibition for Redevelopment of Bankstown North Public School, 322 Hume Highway, Bankstown. We note the redevelopment of the Bankstown North Public School involves the removal of aged facilities and the construction of new school facilities and site service upgrades.

Heritage NSW has reviewed the following documents as part of our assessment:

- *Environmental Impact Statement*, prepared by DFP Planning, dated 30 September 2020
- Appendix 1 – SEARs reference Table, prepared by DFP Planning, dated September 2020
- Appendix 2 – Mitigation Measures, prepared by DFP Planning, dated September 2020
- Appendix 22 – *Aboriginal cultural heritage assessment report* (ACHAR), prepared by Unearthed Archaeology & Heritage, dated May 2020
- Appendix 23 – *Aboriginal Archaeological Assessment*, prepared by Unearthed Archaeology & Heritage, dated March 2019
- Appendix 30 – *Preliminary Construction Management Plan*, prepared by RPS Group, dated 22 April 2020

We provide the following comments in relation to Aboriginal cultural heritage regulation matters.

Aboriginal cultural heritage regulation review of EIS and ACHAR

The 2019 Aboriginal Archaeological Assessment and 2020 ACHAR outline that as the Bankstown North Public School is situated on Wianamatta Shales and located approximately 900m from the Cooks River it is predicted that the proposed works will not impact on Aboriginal objects. While it is stated that entire study area was inspected on foot, ground visibility during the site inspection was nil due to the presence of grass and concrete surfaces. No test excavations have been undertaken to confirm any subsurface potential.

We note the survey for the Aboriginal Archaeological Assessment was undertaken in November 2018 prior to the commencement of consultation with the Aboriginal community. Consultation was undertaken as a requirement of the SEARs issued in 2019. A copy of the Draft Cultural Heritage Assessment Report was subsequently provided to Registered Aboriginal Parties for review and comment.

The ACHAR provided four recommendations:

1. Aboriginal consultation should continue throughout the duration of the project;
2. Consultation should be undertaken with Gandangara Local Aboriginal Land Council in respect of including Aboriginal history and cultural heritage into the proposed Heritage Interpretation Plan for the school;
3. No further archaeological investigation is required, however, Gandangara Local Aboriginal Land Council have stated that they would like a site officer on site to monitor any ground disturbance;
4. An Aboriginal Heritage Impact Permit (AHIP) is not required for any works at Bankstown North Public School.

The mitigation measures outlined in Appendix 2 of the Environmental Impact Statement (EIS) include stop work provisions if Aboriginal objects are located during works. The measures include a statement that Gandangara Local Aboriginal Land Council would like a site officer on site to monitor any ground disturbance. However, there is no follow up information regarding whether this request will be considered or how monitoring would occur and when.

We note the Preliminary Construction Management Plan does not contain any provisions for Aboriginal cultural heritage matters to be considered as part of construction activities.

Aboriginal cultural heritage regulation advice

While the proposed development appears to have low potential to impact on Aboriginal cultural heritage, we provide the following recommendations:

- An Unexpected Finds Protocol for Aboriginal objects needs to be prepared as part of the Construction Management Plan (CMP) for the site and be implemented during all development works.
- The EIS needs to give further consideration as to the Gandangara Local Aboriginal Land Council request for a site officer to be on site to monitor any ground disturbance.
- We support ongoing consultation with the Aboriginal community as part of construction activities and recommend a Heritage Interpretation Plan be prepared that incorporates Aboriginal history and cultural heritage. Heritage NSW also recommends that the Aboriginal Participation in Construction Policy (APIC) is considered for this development.

If you have any questions regarding the above advice please contact me on (02) 6229 7089 or via email at jackie.taylor@environment.nsw.gov.au.

Yours sincerely



Jackie Taylor
Senior Team Leader, Aboriginal Cultural Heritage Regulation - South
Heritage NSW
20 November 2020