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Senders ref: SSD-10394

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By email: [ingrid.berzins@planning.nsw.gov.au](mailto:ingrid.berzins@planning.nsw.gov.au)

Response submitted via the NSW Government Major Projects Portal

Dear Ms Berzins

### **Notice of Exhibition - St John of God Richmond Hospital Redevelopment (SSD-10394)**

Thank you for referring the Environmental Impact Statement (EIS) for the above State Significance Development (SSD) to Heritage NSW for comment on 15 January 2021. We understand this SSD relates to the redevelopment of existing health facilities located at Lot 11 DP 1134453 including construction of upgraded and expanded facilities, partial demolition of existing buildings, retention of Belmont House and integrated open space and landscaping.

In preparing the following advice we have reviewed the following documents:

- SEARs for SSD-10394, issued 5 December 2019
- Aboriginal Cultural Heritage Assessment Report (ACHAR) - prepared by Biosis Pty Ltd (Biosis), dated 7 September 2020
- Environmental Impact Statement St John of God Richmond Hospital (EIS) - prepared by Mecon NSW Pty Ltd, dated 1 December 2020.

### **Aboriginal cultural heritage regulation review of EIS and ACHAR**

Heritage NSW has reviewed the EIS and ACHAR and notes that no Aboriginal objects, areas of potential archaeological deposit (PAD) or Aboriginal Places were identified within the development and construction footprint of the study area. Areas of moderate and high Aboriginal archaeological sensitivity were identified outside of the development and construction footprint within the study area. Additionally, the Richmond Hill Memorial Gardens is located outside of the development and construction footprint within the study area. This item has been identified to have Aboriginal cultural significance values by the ACHAR.

An archaeological survey of the study area was completed on 16 January 2020. A representative for the Richmond Hill Memorial Gardens was invited but unable to attend. Areas of archaeological sensitivity ranging from high to low were identified across the study area based on the results of the archaeological survey and background research.

It is understood that the development and construction footprint was constrained to areas of low archaeological sensitivity based on these results as shown in Figure 36 of the EIS (page 82). Biosis recommended that no further archaeological investigation was required for the development and construction footprint. Biosis also recommended that archaeological test excavation would be required if harm was proposed in the future to areas of high or moderate archaeological sensitivity.

It is understood that Aboriginal consultation for the project has been undertaken in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010). The results of the archaeological survey and Aboriginal consultation were used to formulate the management recommendations. The Registered Aboriginal Parties for the project supported the recommendations included in the ACHAR.

### **Aboriginal cultural heritage regulation advice for EIS**

Heritage NSW supports the mitigation measures and recommendations outlined by Biosis in Section 6 (pages 23-24) and Section 7 (pages 25-26) of the ACHAR (12 November 2020). We note these measures are listed in section 6.5 of the EIS (page 83).

We recommend the EIS and any Construction Environmental Management Plan prepared for the project incorporate an Aboriginal Heritage Management Plan (AHMP) to minimise and avoid potential harm to the Richmond Hill Memorial Garden and areas of Aboriginal archaeological sensitivity adjacent to the development and construction footprint. It is also recommended that an Aboriginal cultural heritage awareness induction is provided to all contractors and staff involved in the construction phase of the project.

Please note: the above comments relate only to Aboriginal cultural heritage regulation matters. You may wish to seek separate advice from Heritage NSW in relation to the State Heritage Register listed sites and matters under the *Heritage Act 1977*.

If you have any questions regarding the above advice, please contact Claire Rayner, Archaeologist at Heritage NSW, on 8289 6709 or [claire.rayner@environment.nsw.gov.au](mailto:claire.rayner@environment.nsw.gov.au).

Yours sincerely



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**Heritage NSW**

Date: 16 February 2021