



Rebecca Sommer
Principal Planning Officer
Infrastructure Assessments
Department of Planning, Industry & Environment
By email: Rebecca.Sommer@planning.nsw.gov.au

Your reference: SSD-10465
Our reference: DOC21/260461

Dear Rebecca,

**Advice on EIS and recommended conditions – State Significant Development –
Mosman High School Upgrade (SSD-10465)**

Thank you for your referral uploaded to the Major Projects Portal on 6 March 2021 seeking advice on the response to submission for the above state significance development (SSD) proposal.

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

- Environmental Impact Statement: State Significant Development Application (SSD10465) – prepared by Architectus Australia Pty Ltd, dated March 2021
- Appendix A: SEARs for SSD-10465, issued 18 June 2020
- Appendix J: Heritage Impact Statement for SSDA Submission – prepared by Purcell, dated March 2021
- Appendix K: Aboriginal Cultural Heritage Assessment Report (ACHAR) – prepared by Austral Archaeology Pty Ltd (Austral), dated March 2021
- Appendix L: Aboriginal Archaeological Report (AAR) – prepared by Austral, dated March 2021
- Appendix M: Historical Archaeological Assessment and Archaeological Research Design - prepared by Austral, dated March 2021
- Appendix R: Mosman High School Geotechnical Investigation Report – prepared by Coffey Services Australia Pty Ltd, dated March 2021

The ACHAR provided is incomplete and does not comply with the project SEARs. A complete and finalised ACHAR is required to inform the project approval. A preliminary review of the current ACHAR has identified the below recommendations:

- The current ACHAR states that the “*Further comments are expected on the completion of Stage 4 of the Consultation Requirements*” (Section 5.2.4), indicating that the consultation of the Registered Aboriginal Parties (RAPs) has not been completed. As per Section 11.3 of the project SEARs, Heritage NSW requires a complete and finalised consultation process.
- Any comments received from the RAPs must be collated and incorporated into Section 3 the report (as per *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2010*, DECCW) as well as the cultural significance assessment, impact assessment, and management and mitigation measures.
- Appendices C-F are missing from the current ACHAR. Both Appendices E and F are noted in the ACHAR but not included
- There is a need to consider the potential to uncover intact soil profiles during the Historical Archaeological excavations which may contain Aboriginal Heritage and



contact archaeology. While it is noted in the ACHAR (Sections 2.2 and 4.30 that artefact bearing horizons are generally constrained to the top 300 mm, there is potential for remnant soil profiles within the development area. Variable levels of fill (200-900 mm) were identified in the Geotechnical Report (Appendix R of the EIS) with residual soil identified below. A methodology is required that outlines that process that will be undertaken if Aboriginal Objects are identified during the Historical Archaeological excavations.

If you have any further questions in relation to this matter, please contact Corey O'Driscoll, Archaeologist, at Aboriginal Cultural Heritage Regulation North on 6229 7079 and corey.odriscoll@environment.nsw.gov.au.

Yours sincerely

Dr Samantha Higgs
Senior Team Leader
Aboriginal Cultural Heritage Regulation – North
Heritage NSW

Date: 27 April 2021