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Advice uploaded via the Major Project Portal

Dear Ms Berzins

**Advice for Griffith Base Hospital Redevelopment (SSD-9838218) Environmental Impact Statement – Aboriginal cultural heritage**

Thank you for the referral dated 28 April 2021 inviting comments from Heritage NSW on the exhibited Griffith Base Hospital Redevelopment Environmental Impact Statement (EIS) for this State Significant Development (SSD).

We understand the proposal comprises:

- Demolition of Building 25.
- Construction of a new four storey Clinical Services Building.
- Demolition of remaining buildings vacated after commission of the new hospital, including the existing medical services block.
- Site works including roads, car parking and landscaping.
- Signage.

Heritage NSW provided input into the Secretary's Environmental Assessment Requirements for the SSD proposal on 23 October 2020 (refer to DOC20/837850-4).

The following reports were considered in our assessment:

- *EIS Griffith Base Hospital Redevelopment*. Urbis, April 2021.
- *Griffith Base Hospital Aboriginal Cultural Heritage Assessment Report (ACHAR) SSDA Works*. Comber Consultants, January 2021.

In regard to the Aboriginal cultural heritage assessment prepared in response to the SEARs issued we provide the following comments:

- It is noted that Comber Consultants undertook archaeological test excavations under the [Code of Practice for Archaeological Investigation of Aboriginal objects in NSW](#) (DECCW 2010) at Griffith Base Hospital in May 2020. Five Potential Archaeological Deposits (PADs 1-5) were subject to test excavation. Aboriginal objects in the form of stone artefacts were identified in all 5 PADs. The objects were registered on the Aboriginal Heritage Information Management System (AHIMS) as site 49-2-0180. The Aboriginal cultural heritage values are described in the Aboriginal cultural heritage assessment Report (ACHAR).
- Only one test pit was excavated in PAD 5, which is described as being located in the SSD area, due to the number of underground services located in this area. From PAD 5 one stone artefact was identified. The test pit contained modern building materials such as nails and brick and evidence of bioturbation from tree and grass roots (Comber Consultants 2021:31). As a result of the test excavation, salvage excavation was

recommended in only PADs 1 and 2. No salvage excavation was recommended in PADs 3-5 due to low density of artefacts present and in some areas evidence of historic disturbance of natural soil profiles.

- The ACHAR does not contain a map showing the SSD boundary to support the statement that only PAD 5 is within the SSD boundary (2021:19).
- Consultation was undertaken in accordance with the '[Aboriginal Cultural Heritage Consultation Requirements for Proponents](#)' (DECCW 2010). The results of consultation are documented in the ACHAR (Comber Consultants, 2021).
- Heritage NSW received an Aboriginal Heritage Impact Permit (AHIP) application for harm to Aboriginal objects from the early works program of the Griffith Base Hospital Redevelopment. Supporting the AHIP application was a Review of Environmental Factors (REF) for the early works program determined under Part 5 of the *Environmental Planning and Assessment Act 1979*.
- AHIP 4667 was issued under s90 of the *National Parks and Wildlife Act 1974* to Health Administration Corporation for salvage excavations and harm to certain Aboriginal objects through the proposed works over part of Lot 2 DP 1043580, being part of the Griffith Base Hospital site. The AHIP was issued on the 12 November 2020 for a period of 10 years.
- Salvage excavations under the AHIP were completed by Comber Consultants in December 2020.
- Site 49-2-0180 is now listed as destroyed in AHIMS following impacts under AHIP 4667.
- Care Agreement 4683 was issued to Griffith Local Aboriginal Land Council (Griffith LALC) on 25 March 2021 for the Aboriginal objects recovered from the test and salvage excavations of site 49-2-0180 to be transferred to Griffith LALC.
- The ACHAR recommends no further archaeological assessment, test excavation, salvage excavation or monitoring within the SSD project area, as sufficient information was gained in the testing excavation program (Comber Consultants, 2021).
- The ACHAR recommends an interpretation strategy and plan be developed for the archaeology and Aboriginal history of the Griffith Base Hospital site (Comber Consultants, 2021). Heritage NSW supports this recommendation, noting it could contribute to addressing the SEARs "demonstrate that Aboriginal themed artwork, place naming, planting and other cultural features has been incorporated into the design of the proposed development" (EIS Appendix B SEARs:7).
- The ACHAR recommends if Aboriginal objects are uncovered during the redevelopment, that works should cease in the vicinity and further advice sought from the consultant.
- In response to this and as standard for SSD projects, we recommend that a Heritage Management Plan be developed. The purpose would be to describe how any unexpected finds would be managed and for the Applicant to clarify the SSD boundary, which will then inform approval and management processes.

In response to historic heritage and matters under the *Heritage Act 1977*, please contact the Heritage NSW mailbox at [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au).

#### Recommended conditions for Aboriginal cultural heritage

Should the proposal be approved, we provide the following recommended conditions:

1. The Applicant is to prepare an Interpretation Strategy and Plan to guide the interpretation of the Aboriginal cultural heritage, archaeology and Aboriginal history of

the Griffith Base Hospital site. The strategy and plan would be prepared in consultation with Aboriginal Stakeholders.

2. Prior to the commencement of construction, the Applicant is to prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:
  - (a) Be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary;
  - (b) Be prepared in consultation with Heritage NSW and the Registered Aboriginal Parties;
  - (c) Include a map showing the SSD boundary, AHIP 4667 boundary and the extent of site 49-2-0180. The purpose of the map will be to inform the approval pathway (SSD or AHIP) and management options, if Aboriginal objects are uncovered during works.
  - (d) Include a description of the measures that would be implemented for:
    - a contingency plan and reporting procedure if:
      - previously unidentified heritage items are found; or
      - Aboriginal skeletal material is discovered;
    - ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions; and
    - ongoing consultation with the Registered Aboriginal Parties during the implementation of the plan;
  - (e) include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.

Following the Secretary's approval, the Applicant must implement the Heritage Management Plan.

If you have any questions regarding the above advice, please contact Lyndon Patterson, Archaeologist, Aboriginal Cultural Heritage Regulation – South at Heritage NSW on 02 6022 0619 or [Lyndon.Patterson@environment.nsw.gov.au](mailto:Lyndon.Patterson@environment.nsw.gov.au).

Yours sincerely



**Jackie Taylor**  
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**Heritage NSW**  
25 May 2021