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Department of Planning, Industry & Environment  
By email: [Navdeep.singhshergill@planning.nsw.gov.au](mailto:Navdeep.singhshergill@planning.nsw.gov.au)

Your reference: SSD-8873789  
Our reference: EF21/6995

Dear Navdeep,

**Advice on EIS and recommended conditions – State Significant Development – New Epping South Primary School (Concept and Stage 1) – SSD 8873789**

Thank you for your referral uploaded to the Major Projects Portal on 26 May 2021 seeking advice on the EIS 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 (SSD-8873789) – prepared by DFP Planning Pty Limited, dated May 2021
- Appendix 1: SEARs for SSD-8873789, issued 14 September 2020
- Appendix 10: Aboriginal Cultural Heritage Assessment Report (ACHAR), New Public School in Epping, 86 Chelmsford Ave, Epping – prepared by Comber Consultants, dated March 2021

Further detail is required in the ACHAR for it to comply with the SEARs for Heritage NSW to make an informed determination that the EIS has suitability addressed Aboriginal Cultural Heritage. A review of the current ACHAR has identified the below recommendations:

1) Test Excavations

- a) The test excavations did not conform to the Methodology supplied to the RAPs and Heritage NSW on the 4<sup>th</sup> December.
- b) The ACHAR and Archaeological Assessment Report (AAR) do not contain information the reasoning for the test pit locations other than they were placed near geotechnical trenching. Requirement 16a of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010) and Test Excavation Methodology both state that the test excavation units be placed in a systematic grid, this did not occur; and
- c) The information provided in the ACHAR does not make it clear if, following the current test excavation, whether PAD 1 of AHIMS site #45-6-3868 is still considered a PAD or whether further test excavations for required.

2) Assessment of Significance

- a) While the Assessment of Significance presented in Section 7 of the ACHAR is sufficient for this project. Heritage NSW recommends for future assessments that Comber Consultants ensure greater explication of the significance assessment by integrating the background information, consultation of RAPs, and archaeological findings as the current Assessment of Significance provides only a basic assessment; and

3) Salvage Excavations

- a) The ACHAR and AAR must contain a detailed salvage methodology and details on artefact attribute recording; and



- b) The salvage methodology should include information on whether an Archaeologist and RAPs will be monitoring the removal of asphalt and buildings

Further to the additional information required in the ACHAR, Heritage NSW provides the below recommended conditions:

- 1) The ACHAR states that an Aboriginal Object (grindstone) was removed from site for analysis. As per Requirement 18a of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010), an Aboriginal Object should only be removed during test excavation if they are located on/in a test unit. Any other Aboriginal Objects removed without prior consent from Heritage NSW would be considered to be in breach of the NPW Act 1974. Prior to any further works, an application for Care Agreement must be submitted to Heritage NSW for the Object to be transferred into the care of the Local Aboriginal Land Council and/or other Registered Aboriginal Party until another long-term storage option can be secured.
- 2) an Unexpected Heritage Finds and Human Remains Procedure must be prepared to manage unexpected Aboriginal Cultural Heritage finds (heritage items and values) in accordance with any guidelines and standards prepared by Heritage NSW

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](mailto:corey.odriscoll@environment.nsw.gov.au).

Yours sincerely

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**Aboriginal Cultural Heritage Regulation – North**  
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**Date:** 18 June 2021