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By email: lucinda.craig@dpie.nsw.gov.au

Dear Ms Craig

Notice of Exhibition of application for Taronga Reptile and Amphibian Conservation Centre (SSD-17483577)

Thank you for your referral dated 3rd August 2021 inviting comments from the Heritage Council of NSW on the above State Significant Development (SSD) proposal.

The proposed development involves the construction of a new animal exhibit, called the Reptile and Amphibian Conservation Centre (RACC). The works would include: site establishment works such as demolition of existing structures; construction of staff facilities, animal exhibit areas and amenities including toilets; new and upgraded supporting infrastructure and walkways; augmentation and extension of existing electrical, mechanical, hydraulic, stormwater and dry fire systems; and landscaping works (including removal of 50 trees and relocation of six highly significant trees).

The following documents were considered in our assessment:

- *Historical Archaeological Assessment: Reptile & Amphibian Conservation Centre, Taronga Zoo Bradleys Head Road Mosman, NSW* (Urbis, 2021)
- *Taronga Zoo Reptile and Amphibian Conservation Centre: Environmental Impact Statement* (Urbis, 2021).

As delegate of the Heritage Council of NSW, I provide the following comments on the *Historical Archaeological Assessment*:

- The *Assessment* has been prepared in response to the SEARS, which requires the EIS to include a Heritage Impact Statement.
- The historical archaeological potential of the site has been assessed as follows:
 - nil–low potential for evidence associated with early European occupation of the Mosman area (1788–1911), such as rubbish pits, discard items, post holes etc.;
 - low potential for evidence associated with the earliest phase of Taronga Zoo under the directorship of La Souef (1912–1940), such as foundations of the former Platypus/Coypu enclosure (1939) and a stepped path;
 - low–moderate potential for evidence associated with development of the Zoo under Strahan’s Directorship (1967–1986), such as the former Penguin Pond (c. 1970s) and Seal Show facility (c. 1978).

Heritage NSW considers the assessment of potential as reasonable.

- The significance of the potential archaeological resource has been assessed as follows:
 - evidence of early European occupation would be of State significance as it could reveal information about settlement of the Mosman area unavailable in historical sources;
 - evidence of the earliest phase of Taronga Zoo would have local significance for its association with the establishment of the Zoo;

- early adaptations and extant features of the Zoo may have local significance for demonstrating “evolving zoological philosophy and practice” and the development of the Zoo (Section 6.3);
- evidence of the former Seal Show facility and Penguin Pond do not reach the threshold for local significance as they are recent and well-documented.

Heritage NSW considers that the assessment likely overstates the significance of the site in terms of archaeological values. The archaeological research potential of the site, in relation to the parameters of the proposed development, is limited as the history/development of the Zoo is strongly documented and there is a low likelihood of discovering evidence of early European activity.

- The impact assessment concludes that subsurface disturbance would occur within the development footprint of the RACC, and that some (minor) impacts may also occur in other areas subject to demolition and landscaping works, including the aviaries. Heritage NSW concurs with the impact assessment.
- An archaeological monitoring program is recommended for proposed works within the south-western area of site and for the interior of the extant aviary walls, with a Chance Finds Procedure to be implemented for the remaining site areas. Heritage NSW supports such archaeological approaches.
- The only examples given of the potential archaeological resource of the site that are likely to be considered relics as defined under the *Heritage Act 1977* relate to the early European occupation phase (1788–1911).
- The definition of a relic provided in Section 2.2.1 (pages 15–16) has been superseded, however the *Assessment* refers to the current definition elsewhere in Table 1.

Heritage NSW suggests that an Unexpected Finds condition could be included to manage historical archaeology at the site, as ‘relics’ have statutory protection under section 146 of the *Heritage Act 1977* and their discovery requires the Heritage Council of NSW to be notified.

As the site contains local heritage items, advice should be sought from the relevant local council.

If you have any questions regarding the above advice, please contact Dr Hana Lewis, Senior Historical Archaeology Officer, at Heritage NSW on (02) 9585 6323 or hana.lewis@environment.nsw.gov.au.

Yours sincerely

S Lavelle

17 August 2021

Dr Siobhan Lavelle OAM

Senior Team Leader, Specialist Services

Heritage NSW

Department of Premier & Cabinet

As Delegate of the Heritage Council of NSW