



Lucinda Craig
Planning Officer,
Industry Key Sites
Department of Planning, Industry and Environment
Email: lucinda.craig@planning.nsw.gov.au

Our ref: DOC21/633022-8
Your ref: SSD-17483577

Advice provided via the Major Projects Portal

Dear Ms Craig,

Advice on EIS and recommended conditions – State Significant Development – Taronga Reptile and Amphibian Conservation Centre, Mosman LGA (SSD-17483577)

Thank you for your referral uploaded to the Major Projects Portal on 30 July 2021 seeking advice on the Environmental Impact Statement (EIS) report and recommended conditions for the above state significant development (SSD) proposal.

Heritage NSW has reviewed the following documents as part of our assessment:

- *Taronga Zoo Reptile and Amphibian Conservation Centre: Environmental Impact Statement*, prepared by Urbis, dated July 2021;
- Appendix A – SEARs reference table, prepared by Urbis;
- Appendix K – *Aboriginal cultural heritage assessment report (ACHAR)*, prepared by Urbis, dated 19 August 2021; and
- Appendix H2 – Connecting with Country Statement, dated 28 June 2021 and prepared by Taronga Conservation Society Australia;

We provide the following comments in relation to Aboriginal cultural heritage regulation matters.

Aboriginal cultural heritage regulation review of EIS and ACHAR

The Aboriginal Cultural Heritage Assessment Report (ACHAR) states that there are no previously recorded Aboriginal sites within the subject area, and reported that no Aboriginal objects or sites were identified as a result of the archaeological assessment.

No test excavations have been undertaken to confirm subsurface potential, the ACHAR describes the subject area as having experienced high to extreme levels of disturbance as a result of bulk excavation of the site, vegetation clearance, and construction and demolition of Zoo facilities. Urbis identified low to medium archaeological potential within areas zoned 4, and nil archaeological potential in areas zoned 5. Areas zoned 4 and 5 have previously been excavated down to bedrock or culturally sterile soil profiles.

A single area of sandy deposit of unknown depth with potential to contain archaeological deposit was identified beneath a sandstone boulder in the study area. It was assessed that the boulder is not *in situ* as it contains vertical drill holes and may have been broken off and pushed or rolled downhill from north of the study area. Until the boulder is moved, Urbis cannot assess the depth of the sandy deposit and requirement for test excavations. Recommendation 1 of the ACHAR is for the removal of the boulder to be archaeologically monitored and assessment of the sandy deposit undertaken. A test excavation program will be undertaken if extensive

deposit is identified as a result of the assessment. We note that this sequence of events was proposed by one of the Registered Aboriginal Parties (RAPs), and we support this recommendation given the very large size of the boulder and inability to assess the situation until it has been moved.

We note that Urbis has adequately responded to RAP comments received during the consultation process to date, that no objections to the project have been received, and that several of the RAPs support the ACHAR and recommendations. We also note that RAP responses have been incorporated into the Connecting with Country Framework, which has resulted in the decision to re-use the sandstone boulder in the landscape design reflecting that what is on Country should stay on Country.

Aboriginal cultural heritage regulation advice

While the proposed development appears to have low potential to impact on Aboriginal cultural heritage, we note there is potential for Aboriginal objects to be identified beneath the sandstone boulder in the study area. As such, we support the recommendation outlined within the ACHAR requiring test excavations if potential for intact soils is identified once the boulder is moved.

We also provide the following recommendations:

- Any Aboriginal cultural heritage inductions would benefit from the involvement of Aboriginal community representatives.
- The Chance Finds protocol for Aboriginal objects needs to be included as part of any Construction Environmental Management Plan (CMP) prepared for the development works.

If you have any further questions in relation to this matter, please contact Sarah Robertson on 6299 7088 or via email at sarah.robertson@environment.nsw.gov.au.

Yours sincerely



Dr Samantha Higgs
Senior Team Leader, Aboriginal Cultural Heritage Regulation - North
Heritage NSW
2 September 2021