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Our ref no: DOC19/672185 Your ref no: SSD 9667

Mr William Hodgkinson Senior Environmental Assessment Officer **Industry Assessments** Infrastructure, Planning & Environment GPO Box 39 SYDNEY NSW 2001

Email: william.hodgkinson@planning.nsw.gov.au

Dear Mr Hodgkinson,

## SSD 9667 - Light Horse Interchange Business Hub Eastern Creek - Blacktown LGA -EIS – request for advice

I refer to an email dated 17 August 2019 from Planning, Industry & Environment requesting Heritage Council advice on the above project (SSD 9667). The SSDA seeks consent for the concept development of an industrial business hub and the first stage of works (including demolition, earthworks and infrastructure) on land adjacent to the Light Horse Interchange. The business hub development forms part of the self-funded model for the Western Sydney Parklands Trust (WSPT)as they are occupied on a leasehold basis providing ongoing income for the WSPT.

The following documents have been reviewed:

- ENVIRONMENTAL IMPACT STATEMENT LIGHT HORSE INTERCHANGE BUSINESS HUB, EASTERN CREEK SSD 9667 Prepared for Western Sydney Parklands Trust, July 2019, Urbis Pty Ltd
- Light Horse Interchange Business Hub, Eastern Creek NSW (SSD 9667) Preliminary Non-Aboriginal Heritage Assessment, Prepared for Western Sydney Parklands Trust, Extent Heritage Pty Ltd, March 2019.

The SEARs for the Project were issued on 7 November 2018. The Heritage requirement was for an Aboriginal Cultural Heritage Assessment Report prepared in consultation with Aboriginal people and in accordance with (former) OEH Guidelines. The Heritage Council had previously advised by letter dated 16 October 2018 that no specific non-Aboriginal heritage SEARs were recommended.

The above reports indicate that historic research, checking of heritage schedules and prior reports and field inspection were undertaken to assess the impacts of the proposal on potential heritage items and more particularly, historical archaeology in the area of the business hub development.

The Extent Heritage Assessment notes the site is not listed as an item of State or local heritage significance. The site was formerly occupied by the Wallgrove Army Camp and Wallgrove Migrant Hostel, however, none of the remaining buildings and structures are

considered to have any heritage significance. The buildings, former sewage treatment plant and other remnant foundations have some potential for interpretation of the history and development of the study area and locality.

The assessment for historical archaeological potential also indicates there is little to no potential for evidence across the study are. Most of the original complex has been removed and the concrete foundations have been archivally recorded. The likelihood of artefacts is low and research potential would be limited. Based on the low level of historical evidence for occupation during the 19th and early 20th century and low level of research value of remaining archaeological deposits, the study area was assessed as having little or no archaeological significance.

As none of the potential historical elements, sites or relics were assessed to be of heritage significance, the Extent report has recommended that any on site works proceed using an Unexpected Finds Procedure. This is considered appropriate.

The Extent report notes that if significant 'relics' were to be found, notification would be required under s146 of the NSW Heritage Act, 1977. That is correct and if such items were found additional assessment or investigations might be appropriate. The Extent report then incorrectly states that a Permit under S141 of the Heritage Act may be required. That is not the case because s4.41 of the EPA Act specifically suspends the operation of that part of the Heritage Act meaning permits do not need to obtained.

The Extent report has recommended that an Interpretation be prepared. This recommendation is supported.

The Extent report has also recommended that a qualified archaeologist should inspect processes such as removal of building slabs, excavations of the ground surface and general clearing of levelling works. This recommendation is not supported as archaeological involvement is not considered necessary for a site with former 20<sup>th</sup> century occupation that has been assessed as having little or no archaeological significance.

For any further enquiries please contact me either by telephone: 02 9873 8546 or email: siobhan.lavelle@environment.nsw.gov.au

Thank you for referring this matter for comment.

Yours sincerely

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11 September 2019

DR SIOBHAN LAVELLE OAM

Senior Team Leader, Specialist Services Heritage, Community Engagement Department of Premier and Cabinet

As Delegate of the NSW Heritage Council