19 November 2018

Matt Inch  
Associate Director  
Johnstaff on behalf of Health Infrastructure  
Level 5, 9 Castlereagh Street  
Sydney, NSW, 2000

Dear Matt,

**RE: Exhibition of Concord Repatriation General Hospital redevelopment (Concept and Stage 1) SSD 9036 – Response to Aboriginal and historic heritage comments**

Our Ref: Matter 26790

I refer to your email dated 24 October 2018 and comments regarding both Aboriginal and historic heritage received from the Office of Environment and Heritage (OEH) and the City of Canada Bay Council (CBC) following the exhibition of the Concord Repatriation Hospital redevelopment (Concept and Stage 1) SSD 9036. The following letter provides Biosis' advice to Johnstaff regarding these comments and is intended to inform Johnstaff's response to OEH and the CBC.

I note the comments from OEH (DOC18/67965) regarding Aboriginal cultural heritage, in particular, reference to the Aboriginal due diligence assessment (ADDA) undertaken by Biosis (August 2018) at the request of Johnstaff on behalf of Health Infrastructure:

*Further assessment of Aboriginal cultural heritage is recommended in the form of an Aboriginal Cultural Heritage Assessment report (ACHA), with formal Aboriginal community consultation and a staged program of archaeological test excavations, to inform the development and satisfy the project SEARs.*

In response to this comment, I can advise the following:

- An ACHA, including an archaeological investigation and community consultation with registered Aboriginal parties (RAPs) has been undertaken in line with the *Guide to investigation, assessing and reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011), and the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010). This report is currently being finalised.
- During consultation for the ACHA, RAPs advised that there were no known Aboriginal cultural heritage sites, materials or items within the proposed works footprint. The RAPs further advised that the Aboriginal archaeological potential of the area was low.
- The archaeological investigation and the results of geotechnical testing provided both within the ADDA and the forthcoming ACHA have determined that the hospital is situated on an area of fill and historically disturbed terrain up to several metres in depth.
- Following these investigations, Biosis' assessment of archaeological potential within the proposed works footprint is low, and a program of test excavations is not required.

I further note the comments from the Heritage Branch of OEH (DOC18/662800) regarding historic heritage at the site:

*Biosis Pty Ltd  
Sydney Resource Group*
The award-winning [Stephenson and Turner] buildings on the subject site are not proposed to be demolished as part of the proposal, however the proposed building envelop[e] is in close vicinity [to the proposed works]... It is recommended that the building envelop[e], and detail[ed] design of the proposed development allows for the current levels of lighting and ventilation to the Stephenson and Turner buildings to be retained.

Regarding these comments, I can advise the following:

- The Historical heritage assessment (HHA) and Statement of Heritage Impact (SoHI) prepared by Biosis did not specifically assess the Stephenson and Turner buildings as these were outside of the scope of works provided and no impacts were proposed on these buildings.
- However, Biosis agrees with the OEH's recommendations and both the HHA and SoHI will be updated to incorporate these comments.

I also note the following comments from the CBC, contained within the spreadsheet attached to your email of 24 October 2018:

- The proposal will have an adverse impact on the heritage values of Concord Hospital as it will result in the loss of buildings, spaces and landscape features that were part of the original hospital. The proposal will also adversely affect the setting of the original hospital buildings, in particular the main building, the multi-ward block.
- The Statement of Heritage Impact (dated 21 June 2018, prepared by Biosis) submitted with the proposal recommends archival recording as a mitigation measure in relation to some of these buildings. This is supported, however, buildings in addition to those noted in the Statement of Heritage Impact, should also be archivally recorded as these buildings are also historic buildings, although altered. Buildings and features of the site which should have an archival recording prepared prior to demolition are set out below:-
  - Buildings numbered 10, 11, 14, 15, 16, 17, 18, 19, 63, 64, 65, 67, 72 and 73 on the plan shown in Plate 19 "Existing Buildings at Concord Repatriation Hospital 2015", page 56 in the Statement of Heritage Impact.
  - The tennis courts, including photos of their setting.
- The archival record must include original plans at 1: 100 scale (or similar) as well as plans of the current buildings. A hard copy of the archival record for each building is to be provided to Canada Bay Council (for Council's Local Studies Library). The archival records are to include an electronic copy of the document on a good quality memory stick (for Council's electronic database.)

I am able to advise the following in relation to these comments:

- The impacts of the project upon heritage values and their mitigation have been addressed in detail in the HHA completed by Biosis in June 2018.
- Biosis has undertaken archival recording of buildings numbered 60, 61, 62, 63, 64 and 69. Buildings 65, 67, 72 and 73 still require recording at a date to be advised by Johnstaff.
- Archival recording of the tennis courts, including their setting, was completed on 20 June 2018. These will be included in the archival recording report. The HHA also discusses the significance and impacts of the proposal upon the tennis courts.
• Biosis has been advised that Johnstaff on behalf of Health Infrastructure intends to have buildings numbered 10, 11, 14, 15, 16, 17, 18 and 19 archivally recorded prior to their demolition in late 2021.

• Biosis has received plans for buildings 63 and 64 from Johnstaff. These will comprise part of the archival recording report.

• I note that Johnstaff intends to request original floorplans for the buildings requiring archival recording/already archivally recorded from Health Infrastructure. If these are located, I request that these be forwarded to Biosis for inclusion in the archival report.

• Both electronic and hard copies of the archival report will be lodged with the CBC and the Canada Bay Public Library upon completion.

Please do not hesitate to contact me if you have any enquiries or require any further clarification or advice.

Yours sincerely

Dr Amanda Markham
Senior Archaeologist