



artefact

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Dear Suzan,

**RE: Addendum to Riverwood Estate Renewal – Heritage Submissions Response to address the Revised RTS Stage 1**

NSW Land and Housing Corporation (LAHC) is seeking to renew the Riverwood Estate to increase housing supply, facilitate the redevelopment of ageing social housing stock and provide fit for purpose social and private housing within an integrated community.

In June 2022, LAHC engaged Artefact Heritage (Artefact) to develop a Connecting with Country (CwC) Framework and Heritage Interpretation Strategy (HIS) to explore the Aboriginal and non-Aboriginal cultural heritage of the site and surrounding area and subsequently inform the design and development of the project.

The Riverwood Rezoning Proposal was placed on Public Exhibition from 12 August 2022 to 25 September 2022. A Statement of Heritage Impact (SoHI) and Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared by Artefact Heritage in 2022 were included in the exhibition documents. Numerous public and agency submissions were received and reviewed.

In March 2023, Artefact Heritage prepared a memo report to provide a formal response to submissions pertaining to Aboriginal and non-Aboriginal cultural heritage. This memo has been updated to reflect the Revised RTS Stage 1 study area.

## Overview

Several government agencies provided submissions relating to heritage from the Riverwood Rezoning Proposal exhibition documentation, including:

- Aboriginal Affairs NSW
- Aboriginal Housing Office
- Heritage NSW
- Georges River Council
- Department of Planning and Environment.

Submissions included a range of heritage themes, ranging from key issues relating to Aboriginal cultural heritage and Aboriginal communities living in the Riverwood area, the significance of nearby Salt Pan Creek, historical and Aboriginal archaeological constraints, planning considerations and

heritage interpretation. This memo serves as a response to the heritage related submissions only. Each of those submissions and relevant comments are addressed below. It is noted that the public submissions did not raise any Aboriginal or non-Aboriginal heritage issues.

## Heritage responses

### Aboriginal Affairs NSW

The following table below includes relevant comments from Aboriginal Affairs NSW, and responses from Artefact Heritage.

Agency Comment	Artefact Response
<p><i>Early engagement with Gandangara LALC, Metro LALC and other Aboriginal community based groups for the area.</i></p>	<p>Ongoing community and key stakeholder consultation has been undertaken since the project was identified for renewal in 2016, including prior to and following submission of the exhibited scheme in 2022.</p> <p>The ACHAR (Artefact, 2022) explored the Aboriginal cultural values of the place and associated archaeological potential, and included consultation with 11 Registered Aboriginal Parties and the Metro LALC. The ACHAR included draft development controls to protect Aboriginal cultural values and areas of archaeological potential, along with recommendations for ongoing consultation and management processes for an area of potential archaeological deposit located within the Riverwood Estate.</p> <p>The CwC Framework (Artefact, 2022) builds on the findings of the ACHAR and explores the cultural values of the place to be imbedded in the design and development of the project. This has included consultation with key stakeholders and knowledge holders including the Metro LALC, Canterbury Bankstown's Aboriginal Reference Group and Dr Shayne Williams of the Burruga Foundation (descendant of prominent Aboriginal activist Joe Anderson, who was closely connected with Salt Pan Creek). As part of the Connecting with Country process, a Walk on Country was held with key members of the design team, along with subsequent workshop sessions to identify and explore the key cultural heritage values of Salt Pan Creek and wider Riverwood area. Important stories and cultural values identified in the Connecting with Country process were translated into guiding design principles that will inform the design and development of the project. Note: the project area is not within the boundaries covered by Gandangara LALC.</p> <p>An Addendum CwC report was prepared in September 2023 to address the revised RTS Stage 1 study area. The Addendum CwC report includes consultation findings, statements of commitment, principles for action and key design principles as applicable for the new study area.</p>

*Incorporate within the broader master plan ‘always was, always will be Aboriginal land, cultural aspects, are there stories that could be shared.*

The CwC Framework (Artefact, 2022), which explores the cultural values and stories of the Riverwood area and Salt Pan Creek, included consultation that explicitly identified ‘always was, always will be Aboriginal land’ as a being a key principle. ‘Always was, always will be Aboriginal land’ will continue to form a key guiding design principle This principle has been included in the design controls/DCP for the design and delivery of the project.

‘Always was, always will be Aboriginal land’ is included as a key design principle in the Addendum CwC report prepared by Artefact in September 2023 for the revised RTS Stage 1 study area.

*Given Salt Pan creek is at the back I am assuming cultural practice relating to the waterway. Not so much now due to pollution is my guess. But this should be investigated.*

The cultural connections and values of Salt Pan Creek are explored and explained in the CwC Framework (Artefact, 2022) prepared in collaboration with knowledge holders. The creek itself is outside the project area, but the Framework highlights opportunities to strengthen the connection between the Riverwood Estate and Salt Pan Creek (including interpretation), and consideration of the environmental impacts of development on the mangrove environment along Salt Pan Creek - which has been highlighted by local knowledge holders as being important. Knowledge holders noted that while the water is polluted, a significant mangrove environment remains.

The revised RTS Stage 1 study area is located at the north eastern edge of the original Riverwood Estate Renewal boundary, approximately 835 metres to the east of Salt Pan Creek, although the important connection of the site with Salt Pan Creek is maintained as a key design principle and consideration for the project team in the Addendum CwC report.

## Aboriginal Housing Office

The following table below includes relevant comments from the Aboriginal Housing Office, and responses from Artefact Heritage.

Agency Comment	Artefact Response
<p><i>Recommend the same planning, infrastructure support considerations and community engagement approach, is used where possible with the same Aboriginal Consultants engaged in the Waterloo development, to understand and plan appropriate Aboriginal community engagement across all planned Greater Sydney developments impacting communities in the coming years.</i></p>	<p>Artefact Heritage was engaged by LAHC to prepare a CwC Framework (Artefact, 2022). This report explores the Aboriginal cultural values and stories of the Riverwood area and Salt Pan Creek, and translated these stories into principles that are intended to inform the design and development of the project in a way that respects and celebrates the Aboriginal cultural values of the place and connections to Country. As part of the CwC Framework (Artefact 2022), consultation was undertaken with key local knowledge holders including Metro LALC, City of Canterbury Bankstown's Aboriginal Reference Group and the Burruga Foundation.</p> <p>The Addendum CwC report for the RTS Stage 1 study area builds on the findings from this consultation.</p>

*Recommend that recognition and appropriate engagement takes place around places of cultural significance impacted by the development.*

Artefact Heritage prepared an ACHAR (Artefact, 2022) that explored the Aboriginal cultural values of the place and associated archaeological potential. The ACHAR identified a potential archaeological deposit (PAD), that has been listed on the AHIMS. No development is currently proposed or anticipated in the future within this area of archaeological potential, and as such it is considered there will be no impacts. In the event that development is proposed within this area, archaeological test excavations and associated consultation processes would be carried out to minimise, manage and mitigate any impact. The CwC Framework (Artefact 2022) builds on the findings of the ACHAR and involved further consultation with local knowledge holders and stakeholders to ensure the project respects, retains and celebrates the Aboriginal cultural heritage significance of the Riverwood area and Salt Pan Creek.

The Addendum CwC report for the RTS Stage 1 study area includes the key findings and cultural values from the consultation undertaken for the wider Riverwood Estate Renewal project.

*Recommend that Indigenous procurement considerations and economic development opportunities are maximised to benefit Indigenous communities and organisations, beyond property management by ACHPs and Aboriginal employment, business capability and business development opportunities are maximised.*

Consultation carried out in the CwC Framework (Artefact, 2022) has highlighted the importance of the project in providing ongoing benefits to the Aboriginal community. Local knowledge holders/stakeholders have nominated local businesses and organisations that can be integrated in the lifecycle of the project and also the future management of the Riverwood Estate. This information is contained in the CwC Framework.

The Addendum CwC report nominates the Aboriginal owned and managed businesses and organisations identified in the CwC Framework (Artefact 2022).

## Heritage NSW

The following table below includes relevant comments from Heritage NSW, and responses from Artefact Heritage.

Agency Comment	Artefact Response
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### Aboriginal cultural heritage (ACHAR)

*Area of potential archaeological deposit (PAD, AHIMS site number 45-6-3358): archaeological test excavation is conducted within any parts of the PAD proposed for impacts. Test excavation needs to occur at an early stage of project planning.*

At this stage there is no development proposed within the PAD that was identified in the ACHAR (Artefact, 2022). The revised RTS Stage 1 is located approximately 400 metres to the east of the PAD.

*Aboriginal community consultation process is maintained. Project updates should be provided to the Registered Aboriginal Parties (RAPs) at least every 6 months. Archaeological test excavations and any future AHIP application need to be able to demonstrate a continuous consultation process.*

Artefact Heritage were engaged by LAHC to prepare a CwC Framework (Artefact, 2022) which explores the cultural values and stories of the place to be embedded into the design and development of the project. This Framework was prepared in consultation with key local knowledge holders of the Riverwood area and Salt Pan Creek, including the Metro LALC, City of Canterbury Bankstown's Aboriginal Reference Group and Dr Shayne Williams of the Burruga Foundation (descendant of Joe Anderson).

The Addendum CwC report for the revised RTS Stage 1 builds on and includes the consultation findings, cultural values and key design principles for the new study area.

It is noted that Registered Aboriginal Parties (RAPs) involved with the ACHAR (Artefact, 2022) have been offered a briefing session facilitated by Urbis during the public exhibition period, although there were no participants that elected to attend a briefing session.

### Historical archaeology (SoHI)

*The SoHI recommended that a precinct wide Archaeological Research Design (ARD) be prepared, setting out the methodology for an archaeological excavation program focusing on significant areas. This is considered an appropriate approach and should inform final designs prior to the commencement of development.*

Further archaeological investigations will be carried out through preparation of an Archaeological Research Design (ARD) at a subsequent project phase (i.e. Concept Design or DA phase), and will be covered by relevant planning framework for the site including the updated DCP. Artefact Heritage note HNSW noted this was an appropriate approach, while requesting that correct legislation is referred to in the controls.

This approach for historical archaeological management and preparation of an ARD would be similarly adhered to for the revised RTS Stage 1 project.

### Georges River Council

The following table below includes relevant comments from Georges River Council, and responses from Artefact Heritage.

Agency Comment	Artefact Response
<p>3. As part of the previous advice, it was recommended that further archaeological investigations be undertaken together with a heritage interpretation strategy to inform the future redevelopment of the site. This is reiterated in the recommendations of the HIS.</p>	<p>Further archaeological assessment will be developed as part of the ongoing development of the project.</p> <p>Aboriginal archaeological testing would occur in the event that impacts are proposed for the potential archaeological deposit (PAD) that was identified in the ACHAR (Artefact, 2022) in Kentucky Road Reserve. The revised RTS Stage 1 study area does not affect or impact the PAD in Kentucky Road Reserve, being located approximately 400 metres to the east.</p> <p>An Archaeological Research Design (ARD) would be prepared at a subsequent project phase (i.e. Concept Design or DA phase) in relation to historical archaeology.</p>

4. A draft DCP has been developed for the precinct. It is noted that the draft DCP includes a dedicated section to European heritage (section 6.1) and Aboriginal Heritage (section 6.2). However, these two chapters are considered generic and merely quote the recommendations of both the HIS and AHAR respectively. It is considered appropriate at this juncture, that the further archaeological assessment and Heritage Interpretation Strategy are developed now, specifically to inform the principal elements of the DCP. In particular, the DCP ought to include controls and elements that incorporate and encourage heritage interpretation of the site /precinct at the early redevelopment phase rather than just leaving it to future individual Development Applications or SSD application/s for development of the precinct. The purpose of the DCP is to 'set the tone' for guiding future development and to achieve a desired future character within the precinct and incorporating elements and controls relating to interpretation of the site. The DCP will also address archaeological sensitivity and ensure these aspects are enshrined in the redevelopment of the site as well as achieving a unified and ratified approach to heritage interpretation, rather than a more 'ad-hoc' approach.

Artefact Heritage has advised on the preparation of the updated DCP to ensure the cultural heritage values of the place (as identified in the SoHI, ACHAR, HIS and CwC Framework – all prepared by Artefact Heritage in 2022), are integrated into the design and planning of the project.

A Heritage Interpretation Strategy to support the master plan project has been developed (Artefact, 2022), which identifies key cultural heritage themes in the Riverwood area and appropriate interpretive media to convey these stories in the ongoing development of the project. A CwC Framework (Artefact, 2022) has also been developed that explores the Aboriginal cultural values of the area and includes recommendations that aim to embed these values in the design and lifecycle of the project. This work was carried out in consultation with local knowledge holders from key stakeholder groups including the Metro LALC, City of Canterbury Bankstown Aboriginal Reference Group and Burruga Foundation.

The findings of the HIS and CwC Framework have been built upon and included in the Addendum HIS and CwC reports for the revised RTS Stage 1 project.

Artefact Heritage has advised on the updated DCP, which will include provisions around archaeological sensitivity. It is noted further archaeological assessment will be developed as part of the RTS Stage 1 project (see above response).



*It is recommended that the Heritage Interpretation Strategy and further archaeological investigations be prepared and the recommendations and outcomes of these respective studies inform and refine the DCP, in particular, Sections 6.1 and 6.2.*

A HIS (Artefact 2022) and a CwC Framework (Artefact, 2022) have been prepared to support the master plan project, the recommendations of which have informed the DCP and design, development and future of the Riverwood Estate renewal project. The findings and recommendations have been included and adapted in the Addendum HIS and CwC reports for the revised RTS Stage 1 project.

Further archaeological investigations will be carried out through preparation of an Archaeological Research Design (ARD) at subsequent project stages (i.e. Concepts Design or DA phase), and will be covered by relevant planning framework for the site including the new DCP. It is noted that HNSW stated this was an appropriate approach (see above comment from HNSW).

Comments 4.1 (a to l) relate to the Statement of Heritage Impact, including the scope of the updated report, site analysis and built heritage assessment.

The Statement of Heritage Impact (Artefact, 2022) aimed to assess the cultural significance of the study area. Detailed site investigation and analysis of existing post-1940s infrastructure was outside the approved project scope. In relation to preparation of a detailed site history, the Statement of Heritage Impact included a recommendation that the social history of the Herne Bay and Riverwood Estates be prepared by a qualified community historian.

## NSW Department of Planning and Environment

The following table below includes relevant comments from the NSW Department of Planning and Environment, and responses from Artefact Heritage.

Agency Comment	Artefact Response
<p><i>Currently, there is not sufficient information to determine whether the proposal is consistent with the Direction as the heritage significance of the site to Aboriginal culture and people is not fully known.</i></p>	<p>The proposal and supporting documentation has been prepared in accordance with the study requirements prepared by the Department of Planning and Environment. The ACHAR (Artefact, 2022) investigated the Aboriginal cultural values of the site and associated archaeological potential. Additional exploration of the Aboriginal cultural values and significance of the site was undertaken in the CwC Framework (Artefact, 2022) that was prepared in consultation with key local knowledge holders (including Metro LALC, City of Canterbury Bankstown's Aboriginal Reference Group and the Burruga Foundation).</p> <p>These findings and recommendations are included in the Addendum CwC report for the revised RTS Stage 1 project.</p>
<p><i>Final DCP controls may require updating to ensure that cultural heritage values are integrated into the place design.</i></p>	<p>Artefact Heritage have worked with Architectus to review the DCP controls to ensure the cultural heritage values of the place (as identified in the CwC Framework process and associated consultation and also the HIS) can be integrated into the design and planning of the project including through to detailed design and delivery.</p>

*The Place Strategy may also require updating to incorporate relevant information from the additional heritage studies. It is not clear how the information provided by these additional studies would be incorporated into the design and at what stage of the planning process.*

Artefact Heritage understand the cultural heritage values of the place (as identified in the CwC Framework process and associated consultation and also the HIS) are to be integrated into the updated Place Strategy to ensure these values inform the design and planning of the project.

The findings of these reports have been reflected in Addendum CwC and HIS reports prepared for the revised RTS Stage 1 project.

### Merits Based Assessment

In addition to the above, the Department of Planning and Environment prepared an assessment based on merits, which distilled the submissions received from exhibition and identified key issues. The following table below includes relevant comments from the NSW Department of Planning and Environment in the merits based assessment.

Agency Comment	Artefact Response
<p><i>It is recommended that LAHC establish a Connecting with Country framework for the proposed and undertake consultation with First Nations People. Consultation with Heritage NSW and the LALC is also recommended.</i></p>	<p>LAHC engaged Artefact Heritage to prepare a CwC Framework (Artefact, 2022) which explores the Aboriginal cultural values and stories of the Riverwood area and Salt Pan Creek.</p> <p>As part of the CwC Framework (Artefact, 2022), consultation was undertaken with key local knowledge holders including Metro LALC, City of Canterbury Bankstown's Aboriginal Reference Group and the Dr Shayne Williams of the Burruga Foundation (a descendant of Joe Anderson). This consultation process included a Walk on Country, project workshop sessions, and provision of the draft report to stakeholders for comment and feedback. It is noted key members of the project team, including LAHC and designers from Architectus, participated in the Connecting with Country consultation.</p> <p>The investigations and consultation resulted in the preparation of statements of commitment and key design principles, both of which will ensure that the cultural values of the place are embedded in the design and development of the project. The consultation findings, cultural values, statements of commitment and key design principles have been included in the Addendum CwC report for the revised RTS Stage 1.</p>



*Following establishment of the Connecting with Country framework and completion of the consultation an amendment to the Master Plan may be required.*

Artefact Heritage worked collaboratively with Architectus to integrate the findings of the Connecting with Country Framework into the heritage section of the updated DCP. The updated DCP reflects the findings from the HIS (Artefact, 2022).

It is noted the CwC Framework included Statements of Commitment and General Design Principles that are intended to influence the development of the Master Plan and subsequent DAs. These elements have been included in the Addendum CwC report for the revised RTS Stage 1 study area.

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*Planning controls in the draft Riverwood Estate SSP Development Control Plan (DCP)/or Design Guide and the Place Strategy may also require updating to ensure that cultural heritage values are integrated into the place design and future development of the site.*

Artefact Heritage have worked collaboratively with Architectus to translate the findings of the Connecting with Country Framework into the heritage section of the updated DCP. The updated DCP also reflects the findings from the HIS that was also prepared by Artefact Heritage.

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## Conclusion

This letter has included responses to all relevant agency submissions relating to heritage. I hope this information is all you require. Please do not hesitate to contact me if you have any questions.

Kind regards,



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