

Pymble Ladies' College Secondary Innovation Precinct (SIP) and Campus Commons Aboriginal Cultural Heritage Assessment Report Memo

Project: 240450: Pymble Ladies' College Secondary Innovation Precinct	Date: 19 September 2025
From: Sammuel Sammut – Heritage Consultant, Artefact Heritage and Environment	To: Greg Hastie – Project Direct Masterplanning and Capital Works, Pymble Ladies' College

Introduction

Artefact Heritage and Environment (Artefact) has been commissioned by Pymble Ladies' College (the College) to prepare an Aboriginal Cultural Heritage Assessment Report (ACHAR) and accompanying Archaeological Technical Report (ATR) to inform the ACHAR, in accordance with the technical requirements of the Secretary's Environmental Assessment Requirements (SEARs) and in support of the preparation of an Environmental Impact Statement (EIS) and State Significant Development Application (SSDA) (SSD-79146716) to the Department of Planning, Housing and Infrastructure (DPHI).

The draft ACHAR was prepared and distributed to Aboriginal stakeholders who had registered for the project on 29 January 2025, in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (Department of Environment, Climate Change & Water 2010) for a period of 28 days. Following this review period, the College informed Artefact that design plans for the project had changed, and a different boundary for the works was now being used.

This cover letter has been prepared to preface the ACHAR as part of the SSDA and must be submitted alongside that report. Its purpose is to explain the differences between the previous and current project boundaries (with the previous project boundary being referred to as 'the study area' in the ACHAR and ATR) and determine whether this will result in any impacts to Aboriginal cultural heritage that were not identified in the ACHAR, and whether any additional mitigation or management measures are required.

EIS advice received from Department of Climate Change, Energy, Environment and Water state the following:

1. *The response from Ku-ring-gai Council in Stage 1 of consultation identified the Aboriginal Heritage Office as an organisation which should be contacted. Please confirm whether the Aboriginal Heritage Office was contacted. If not, the organisation should be contacted with an invitation to register for consultation on the project.*

An invitation to register for the project and a copy of the ACHAR with cover letter and ACHAR methodology was sent to the Aboriginal Heritage Office on 20 August 2025 with response requested by close of Business 17 September 2025. No response was received. A record of the

correspondence has been included in Appendix B Consultation Records included with the submission of the ACHAR.

2. *It is noted that the study area for the proposed works has been altered since the ACHAR was finalised. Please provide an update to all Registered Aboriginal Parties (RAPs) which includes the Pymbles Ladies' College Secondary Innovation Precinct (SIP) and Campus Commons Aboriginal Cultural Heritage Assessment Report Memo, dated 11 March 2025, to ensure that RAPs are kept up to date on the status of the project.*

The ACHAR with cover letter and updated project boundaries was sent to the 7 Registered Aboriginal Parties by email on 21 August 2025 requesting feedback by close of business 18 September 2025. An audit of Artefacts consultation records have indicated that Metropolitan Local Aboriginal Land Council did not register for the project and therefore were not provided with the updated ACHAR. The consultation log and Appendix B Consultation Records were updated accordingly. A summary of the comments received by Artefact are presented in the table below.

Person / RAP group	Comment	Response
 Murra Bidgee Mullangari Aboriginal Corporation	Endorses ACHAR and its recommendations	Noted in this cover letter and consultation records
 Muragadi Heritage Indigenous Corporation	Agrees with ACHAR and its recommendations	Noted in this cover letter and consultation records
 Kamilaroi-Yankuntjatjara Working Group	Agrees with and supports recommendations. Recommends considering planting native plants in the landscaping.	Noted in this cover letter and consultation records

Assessment

A comparison of the originally assessed project boundary and the current project boundary (the development site) is provided below in Figure 1.

As shown in Figure 1, the difference between the previous and current boundaries is minor. The areas incorporated into the current boundary were assessed during the archaeological survey conducted as part of the ATR for this project. No Aboriginal objects or potential for Aboriginal objects were identified in these areas, and these areas were found to contain existing structures or roadways with no natural ground surfaces present. Additionally, no cultural heritage sites were identified during the background research or Aboriginal stakeholder consultation components of the ACHAR. As such, the current project boundary will not result in any impacts to Aboriginal cultural heritage, which is consistent with the findings of the ACHAR.

Conclusion

As the current project boundary is largely similar to the previous project boundary and no Aboriginal objects or cultural heritage values were identified, works within the current project boundary would not result in any impacts to Aboriginal cultural heritage. Consequently, the findings of the ACHAR are upheld, and no additional mitigation or management measures are proposed for the works.

Figure 1: Comparison of previous and current project boundaries



Pymble Ladies' College Secondary Innovation Precinct

Aboriginal Cultural Heritage
Assessment Report

LGA: Ku-ring-gai Council

Report to Pymble Ladies' College

March 2025



Artefact Heritage and Environment

ABN 73 144 973 526

Suite 56, Jones Bay Wharf

26-32 Pirrama Road

Pymont NSW 2009

Australia

+61 2 9518 8411

office@artefact.net.au

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EXECUTIVE SUMMARY

Pymble Ladies' College (the proponent) is completing the last building in their masterplan of works, the Secondary Innovation Precinct, which ties the campus together.

The proponent intends to apply for approval for the works as a State Significant Development. While the Secretary's Environmental Assessment Requirements for the project have not been issued, it is anticipated that they will require the assessment of the impact of the proposed works on Aboriginal cultural heritage. As such, the proponent has engaged Artefact Heritage and Environment to prepare an Aboriginal Cultural Heritage Assessment Report to assess the impact of the proposed works on Aboriginal cultural heritage, and to recommend appropriate management and mitigation measures where required.

This assessment is informed by an Archaeological Technical Report prepared ahead of the present report, which will also be submitted as part of the State Significant Development application process. The technical report is contained in the Appendices (Appendix A – Technical report).

Based on a combination of archaeological and cultural heritage value assessment, this report found the following:

- No registered Aboriginal sites were identified within the study area
- No Aboriginal objects or sites were identified during the archaeological survey and the study area demonstrated significant levels of disturbance
- It is unlikely that Aboriginal objects will be present within the study area due to the significant levels of disturbance caused by the development of the Pymble Ladies' College campus across the twentieth century
- No specific cultural heritage values have been identified for the study area through background research

Based on the above conclusions, the following recommendations are made:

- No mitigation measures are necessary due to the absence of Aboriginal objects, sites and cultural heritage values for the study area, and the lack of potential for Aboriginal objects to be present.
- An unexpected finds policy outlining the protocols to be followed in the event that unexpected Aboriginal objects are encountered during the works must be prepared and presented to project personnel during site inductions.

CONTENTS

1.0	Introduction.....	1
1.1	Project brief	1
1.2	Description of the study area.....	1
1.3	Aims and objectives.....	1
1.4	Statutory framework	3
2.0	Summary of Consultation	4
2.1	Stage 1	4
2.1.1	Agency letters	4
2.1.2	Advertisement	4
2.1.3	Registration of Aboriginal parties.....	4
2.2	Stage 2 and Stage 3.....	5
2.3	Stage 4	6
3.0	Summary and analysis of background information	7
3.1	Archaeological background	7
3.2	AHIMS search	8
3.3	Environmental background.....	11
3.3.1	Soils and geology	11
3.3.2	Hydrology and landforms.....	11
3.3.3	Historic land disturbance	11
3.4	Predictive model	15
4.0	Summary of field investigations.....	16
5.0	Cultural heritage values	19
5.1	Methodology	19
5.1.1	Cultural landscape	19
5.1.2	Types of values.....	19
5.2	Identified Aboriginal cultural heritage values.....	20
5.3	Aboriginal cultural values within the study area	20
6.0	Significance assessment	21
6.1	Significance assessment criteria	21
6.1.1	Historic value	21
6.1.2	Aesthetic value.....	22
6.1.3	Socio/cultural value.....	22
6.1.4	Scientific value	22
6.2	Statement of significance	22
7.0	Impact assessment.....	23
7.1	Proposed works	23

7.2	Aboriginal heritage impact.....	23
7.3	Ecological Sustainable Development principles.....	1
7.3.1	The integration principle	1
7.3.2	The precautionary principle	1
7.3.3	The principle of intergenerational equity.....	1
7.4	Cumulative impacts	1
8.0	Management and mitigation measures	2
8.1	Guiding principles	2
8.2	Management measures.....	2
8.3	Changes to the project area	2
9.0	Conclusion	3
9.1	Summary of findings.....	3
9.2	Recommendations.....	3
10.0	References	4
	Appendix A – Technical report.....	A
	Appendix B – Consultation records.....	B

FIGURES

Figure 1: Study area	2
Figure 2: Extensive AHIMS search results	9
Figure 3: Detailed AHIMS search results	10
Figure 4: 1930 aerial photograph	12
Figure 5: 1971 aerial photograph	13
Figure 6: 2004 aerial photograph	14
Figure 7: Evidence of widespread development and difference in ground levels	17
Figure 8: Partial overview of study area, view to the northeast. Buildings to be demolished.	17
Figure 9: Evidence of surface and subsurface impacts	17
Figure 10: Partial overview of study area, view to the northwest. Buildings to be demolished.....	17
Figure 11: Mixed soils with low visibility	17
Figure 12: Non natural vegetation with low exposure and visibility	17
Figure 13: Gully at northwest edge of site. Not shown on ariel maps of the site	18
Figure 14: Cement pipe showing further evidence of deep subsurface impacts	18
Figure 15: Land modifications of steep slope, including soil disturbance with plastic pipe and ground leveling for road	18
Figure 16: Further evidence of extensive development with a west view. Building to be demolished. 18	
Figure 17: Proposed works in relation to study area	24
Figure 18: Innovation Precinct south elevation plan	1
Figure 19: Secondary Innovation Precinct north-south section plan.....	2

TABLES

Table 1: List of registered stakeholders	4
Table 2: Summary of Aboriginal stakeholder comments on the Assessment Methodology	5
Table 3: Summary of Aboriginal stakeholder comments on the draft ACHAR	6
Table 4: Previous archaeological assessments	7
Table 5: Effective survey coverage	18
Table 6: Landform survey coverage	18
Table 7: Cultural heritage values identified for the study area and surroundings	20
Table 8: Significance assessment	22

NOTE ON LANGUAGE IN QUOTES

A number of quotes used in this report come from documents written in the nineteenth and twentieth centuries by European observers. They have been included because they provide information on the lives of Aboriginal people in the region, though the language used and views expressed by these writers can be offensive and distressing.

GLOSSARY OF TECHNICAL TERMS

Aboriginal cultural heritage: The material (objects) and intangible (mythological places, dreaming stories etc) traditions and practices associated with past and present-day Aboriginal communities.

Aboriginal object: Any deposit, object or material evidence (not being a handicraft made for sale), including Aboriginal remains, relating to the Aboriginal habitation of NSW.

AHIMS: Acronym for 'Aboriginal heritage information management system'. AHIMS is a register that contains information about NSW Aboriginal heritage, and it is maintained by DECCW.

Archaeology: The scientific study of human history, with focus on material remains and ethnographic evidence.

Artefact: An item of cultural material created by humans.

Easting: This is a measurement used to determine location. The easting is the x-coordinate and relates to the vertical lines on a map, which divide east to west. It increases in size when moving

Exposure: The level of ground exposure is based on the whether the landform is eroding, aggrading or stable.

Northing: This is a measurement used to determine location. The northing is the y-coordinate and relates to the horizontal lines on a map, which divide north to south. It increases in size when moving further north.

Potential Archaeological Deposit (PAD): A PAD is a location that is considered to have a potential for subsurface Aboriginal objects. This is determined from a visual inspection of the site, background research of the area and the landform's cultural importance.

Sandstone: Is a sedimentary rock formed from sand-sized grains.

Survey: In archaeological terms, this refers to walking over a surface while studying the location of artefacts and landmarks. These are then recorded and photographed.

Visibility: Refers to the degree to which the surface of the ground can be observed. This may be influenced by natural processes such as wind erosion or the character of the native vegetation, and by land use practices, such as ploughing or grading. It is generally expressed in terms of the percentage of the ground surface visible for an observer on foot.

1.0 INTRODUCTION

1.1 Project brief

Pymble Ladies' College (the proponent) is completing the last building in their masterplan of works, the Secondary Innovation Precinct, which ties the campus together.

The proponent intends to apply for approval for the works as a State Significant Development (SSD). While the Secretary's Environmental Assessment Requirements (SEARs) for the project have not been issued, it is anticipated that they will require the assessment of the impact of the proposed works on Aboriginal cultural heritage. As such, the proponent has engaged Artefact Heritage and Environment (Artefact) to prepare an Aboriginal Cultural Heritage Assessment Report (ACHAR) to assess the impact of the proposed works on Aboriginal cultural heritage, and to recommend appropriate management and mitigation measures where required.

This ACHAR is informed by an Archaeological Technical Report (ATR) prepared ahead of the present report, which will also be submitted as part of the SSD application process. The ATR is contained in the Appendices (Appendix A – Technical report).

1.2 Description of the study area

The development site (Figure 1) is located within the grounds of Pymble Ladies' College (Lots 11-16 DP7131). The development site, which is hereafter referred to as study area, is bounded by a vegetated area to the north, the Pymble Ladies' College Athletic Field to the east, the Pymble Ladies' College grounds to the south, and Avon Road to the west, and measures approximately 4,048 m² in size. It is situated within the Ku-ring-gai Local Government Area (LGA) and within the boundaries of the Metropolitan Local Aboriginal Land Council (LALC).

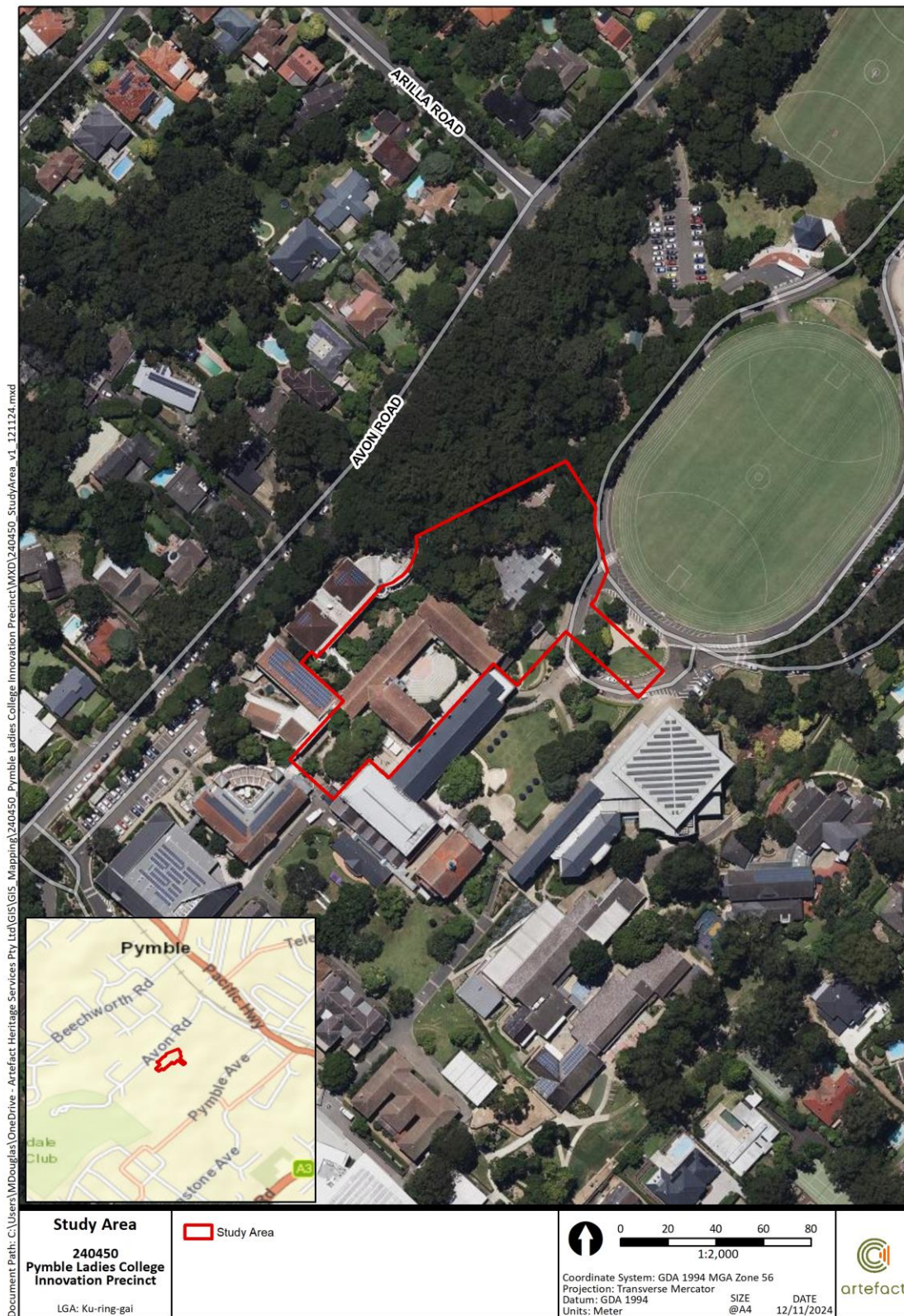
1.3 Aims and objectives

This ACHAR aims to identify and assess the Aboriginal heritage values of the study area and consult with Aboriginal stakeholders in this process and present the results of the archaeological investigation undertaken in the ATR. This report will be included in the Environmental Impact Statement (EIS) used to inform the SSD application for the project, satisfying the requirements of the anticipated SEARs.

The objectives of this report are to:

- Identify any Aboriginal cultural values in and around the study area.
- Assess these cultural values, as related to the study area, through consultation with Aboriginal stakeholders.
- Assess the impacts the proposed construction might have on Aboriginal cultural heritage and the potential archaeological resources within the study area.
- Document the process and outcomes of Aboriginal stakeholders consultation.
- Provide a plain English summary of the results of the ATR to registered Aboriginal Parties (RAPs)

Figure 1: Study area



1.4 Statutory framework

This ACHAR has been prepared to address the requirements of the anticipated SEARs, and the following guidelines

- *Code of Practice for Archaeological Investigations of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change & Water 2010b); hereafter the Code of Practice.
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011); hereafter the Guide.
- *Aboriginal cultural heritage consultation requirements for proponents 2010* (Department of Environment, Climate Change & Water 2010a); hereafter the Consultation Requirements.

The full legislative context for this assessment can be found in the ATR prepared alongside this report, which is contained within the Appendices (Appendix A – Technical report).

2.0 SUMMARY OF CONSULTATION

Consultation for this project has been undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010b). A summary of the Consultation for the project has been provided below. The full consultation records for the project are included in Appendix B – Consultation records.

2.1 Stage 1

2.1.1 Agency letters

In accordance with Section 4.1.2 of the Consultation Requirements, Artefact Heritage corresponded with the following organisations by email on 20 November 2024 requesting the details of Aboriginal people who may hold cultural knowledge relevant to determining the Aboriginal significance of Aboriginal objects and/or places within the local area:

- Heritage NSW
- Native Title Service Corporation (NTSCorp)
- National Native Title Tribunal
- Office of the Registrar, Aboriginal Land Rights Act 1983
- Ku-ring-gai Council
- Metropolitan Local Aboriginal Land Council
- Greater Sydney Local Land Services

The due date for responses was 4 December 2024.

2.1.2 Advertisement

In accordance with Step 4.1.3 of the Consultation Requirements, an advertisement was placed online in the Daily Telegraph online for publication on 6 December 2024. The publication invited the participation of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places within the local area, requesting their response by 20 December 2024.

2.1.3 Registration of Aboriginal parties

In accordance with Section 4.1.3 of the Consultation Requirements, invitations to register an interest in the project were sent by email and mail to all those people identified through contacting the agencies on 5 December 2024 with a response requested by 20 December 2024.

As a result of the interest letters and advertisement, six individuals/organisations initially responded, with one individual registering their interest on 7 January 2025. The stakeholders who registered their interest in the project are listed below in Table 1.

Table 1: List of registered stakeholders

Organisation	Contact
Didge Ngunawal Clan	

Organisation	Contact
Muragadi Heritage Indigenous Corporation	[REDACTED]
Murra Bidgee Mullangari Aboriginal Corporation	[REDACTED]
[REDACTED] Cultural Services	[REDACTED]
Butucarbin Aboriginal Corporation	[REDACTED]
Kamilaroi-Yankuntjatjara Working Group	[REDACTED]
A1 Indigenous Services	[REDACTED]

2.2 Stage 2 and Stage 3

Stage 2 of the consultation process is to provide RAPs with information about the scope of the proposed project and the proposed cultural heritage assessment process. Stage 3 consultation facilitates a process whereby RAPs can contribute to culturally appropriate information gathering and the research methodology, provide information that will enable to cultural significance of Aboriginal objects and/or places within the project area to be determined, and have input into the development of any cultural heritage management options

A copy of the proposed assessment methodology was sent to the RAPs as well as Metropolitan LALC by email on 23 December 2024, requesting feedback by 28 January 2025. The draft assessment methodology presented information about the project and invited feedback on the cultural significance of the area. The individual who registered late was sent the ACHAR methodology on 8 January, but due to their late registration and project deadlines, their response was still requested by 28 January 2025. A summary of the comments received by Artefact is presented in Table 2.

Table 2. Summary of Aboriginal stakeholder comments on the Assessment Methodology

Person / RAP group	Comment	Response
[REDACTED] – Didge Ngunawal Clan	DNC is happy with the methodology that has been provided	Noted in this report and the consultation records
[REDACTED] Cultural Services	I have reviewed the information provided regarding the Pymble Ladies' College Secondary Innovation Precinct project and the proposed Aboriginal Cultural Heritage Assessment Methodology. I am pleased to inform you that I fully support the methodology outlined.	Noted in this report and in the consultation records
[REDACTED] – A1 Indigenous Services	I have reviewed the document and fully support the Methodology.	Noted in this report and in the consultation records

2.3 Stage 4

A copy of the draft ACHAR was sent to the RAPs by email on 29 January 2025, requesting feedback by 26 February 2025. A summary of received by Artefact is provided in Table 3.

Table 3. Summary of Aboriginal stakeholder comments on the draft ACHAR

Person/ RAP group	Comment	Response
Kamilaroi-Yankuntjatjara Working Group	Agreed with findings and supports report. Recommended connecting with Country as part of the proposed development.	Noted in this report and in the consultation records. Connecting with Country approach already being developed for the project.
██████████ – Murra Bidgee Mullangari Aboriginal Corporation	Endorses ACHAR and its recommendations.	Noted in this report and in the consultation records

3.0 SUMMARY AND ANALYSIS OF BACKGROUND INFORMATION

3.1 Archaeological background

Several archaeological assessments have been carried out in the region around the study area, and these are summarised below in Table 4. These studies have demonstrated that Northern Sydney region was extensively occupied by Aboriginal groups, but that land use was more concentrated in areas close to watercourses, and that Aboriginal archaeological evidence is often absent in more developed areas of this region.

Table 4: Previous archaeological assessments

Report	Summary
AMBS, 2013. <i>Wahroonga Adventist School: Aboriginal Cultural Heritage Impact Assessment</i>. Report prepared for Stanton Dahl Architects.	• 3.6km northwest of the study area • Identified that the majority of Aboriginal sites in the region are engravings or grinding grooves due to the natural abundance of sandstone • Low density artefact scatters in the region were associated with creek lines • Determined that the investigated site possessed no Aboriginal archaeological potential due to historical disturbances
Artefact, 2013. <i>Due Diligence Aboriginal heritage assessment for power pole replacements and vegetations management at Kimberley Street, East Killara</i>. Report prepared for Ausgrid.	• 4km east of the study area • Region around the site contained high potential for engravings and grinding grooves • While numerous sandstone surfaces and overhangs were identified during site inspection, no Aboriginal archaeological evidence was identified • No Aboriginal archaeological potential was identified
Artefact, 2014. <i>Aboriginal due diligence heritage assessment for proposed 19 lot subdivision at 59 Miowera Road, Turramurra</i>. Report prepared for NewQuest Projects.	• 4.1km north of the study area • Investigated a site with numerous sandstone outcrops and overhangs and previously undisturbed areas • No evidence of Aboriginal land use was identified, nor was it considered that any was present within the site • Shallow natural soils, an inhospitable slope landform and localised historical disturbance resulted in the determination that the site possessed low archaeological potential
Artefact, 2021. <i>Grey House Precinct, Pymble Ladies' College: Aboriginal Cultural Heritage Assessment Report</i>. Report prepared for Pymble Ladies' College.	• 120m south of the study area • Determined that the Pymble Ladies' College campus has been subject to significant levels of ground disturbance and landscape modification across the twentieth century • Concluded that the site possessed nil-low potential for Aboriginal objects and no cultural heritage values were identified

3.2 AHIMS search

NOTE: The location of Aboriginal sites is considered culturally sensitive information. It is advised that this information, including the AHIMS data appearing on mapping below must be removed from this report if it is to enter the public domain.

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) was undertaken on 22 November 2024 (Client Service ID: 953179) to determine the location of Aboriginal sites in relation to the current study area. The search area was defined as the study area and the region surrounding it to inform the characterisation of the local archaeological context. The AHIMS search parameters were as follows:

GDA, Zone 56	
Buffer	
Number of sites	103

There are no AHIMS registered site located within the study area. The closest registered AHIMS site to the study area is approximately 140m north of the study area at its closest point (Figure 2 and Figure 3). The AHIMS data demonstrates that identified Aboriginal sites are generally located in proximity to watercourses in this region and that there are fewer sites located in more developed areas.

AHIMS ID 45-6-2937

The extensive AHIMS search identified that one Aboriginal site was located approximately 140m northwest of the study area at its closest point. However, examination of the site card has identified that this rock shelter (identified as an Art site) is approximately 10km to the south of the study area and is actually located in Tarban Creek Reserve, Gladesville. The site has been incorrectly plotted within the AHIMS database and is therefore not relevant to the present study.

Figure 2: Extensive AHIMS search results

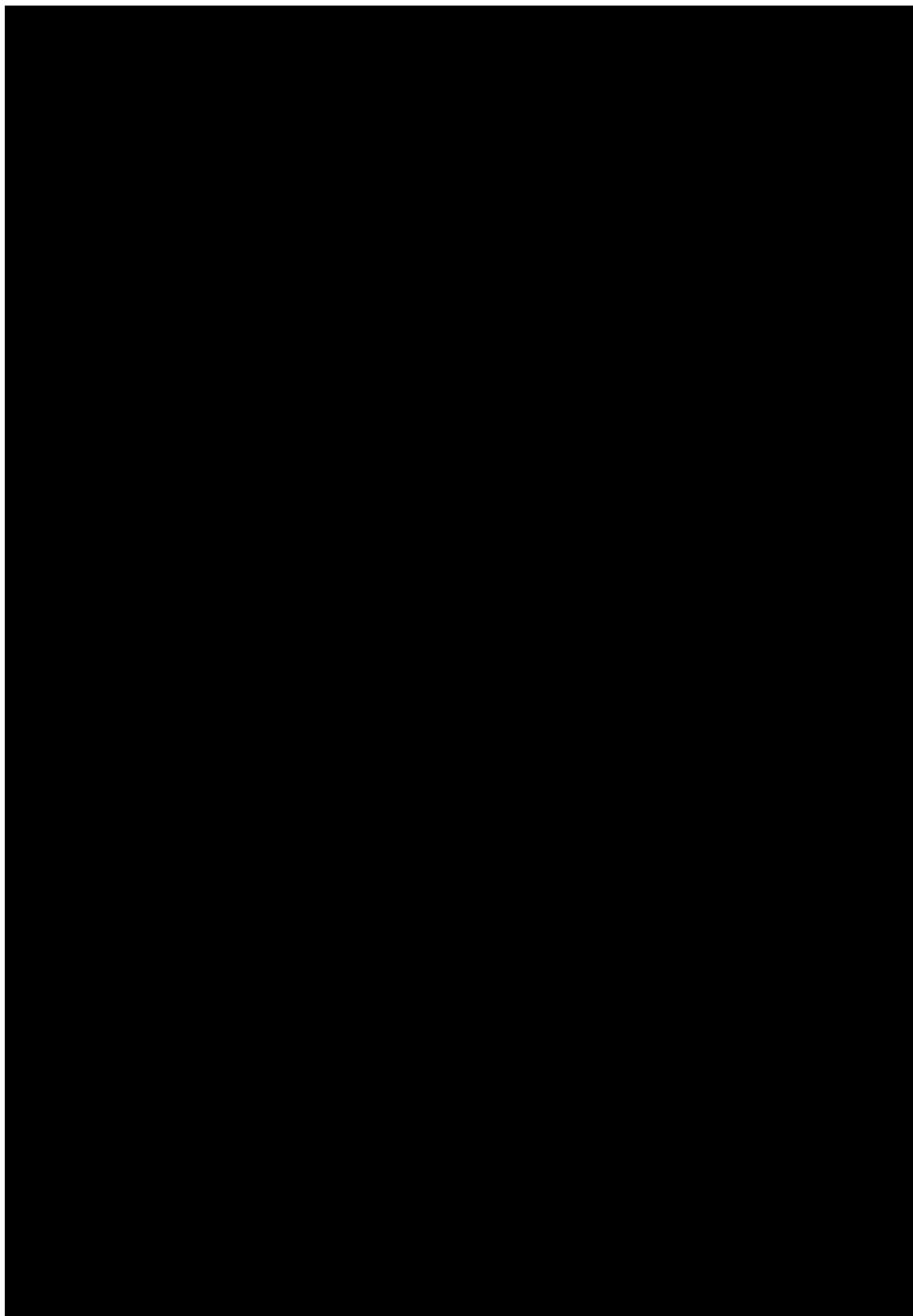
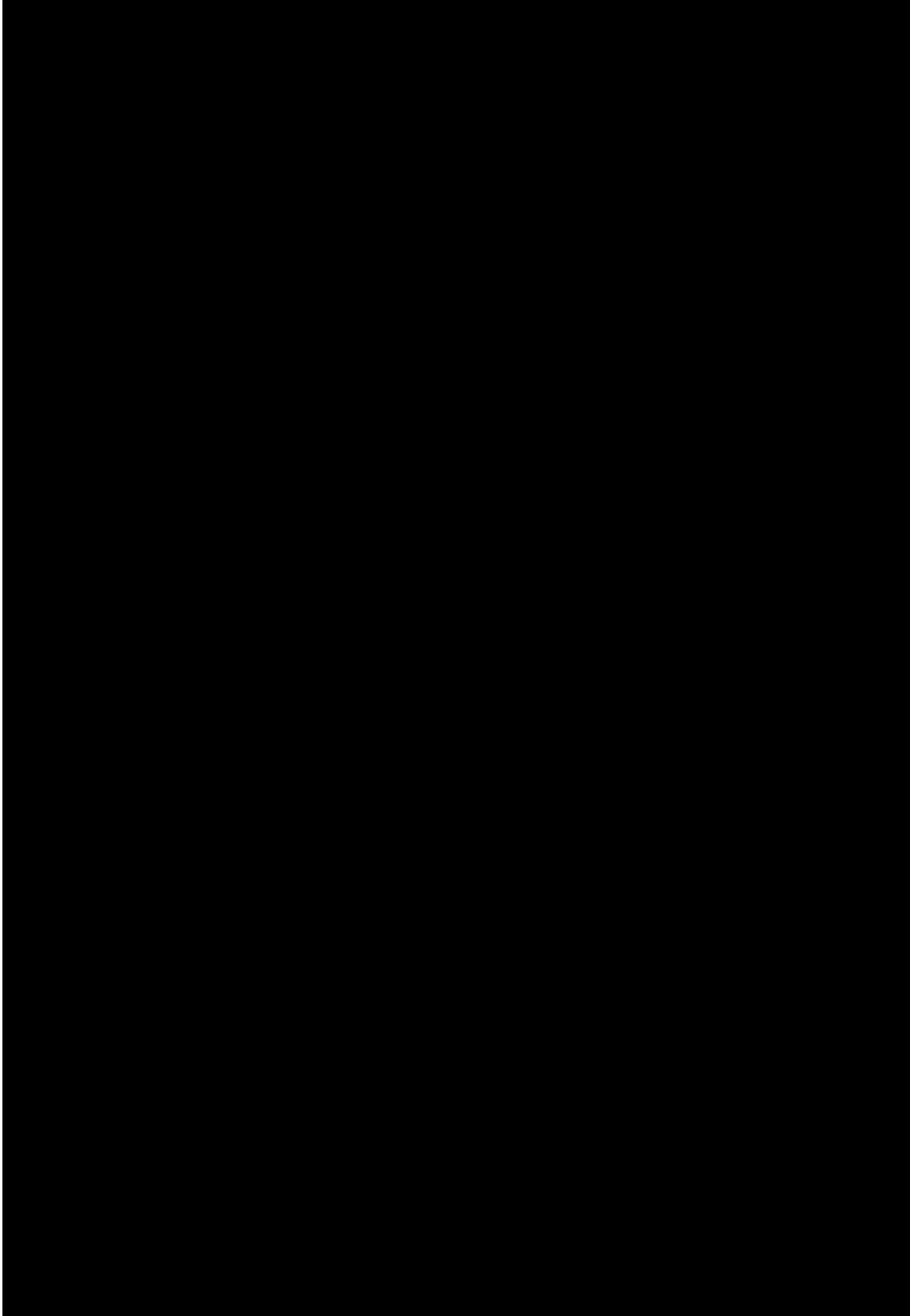


Figure 3: Detailed AHIMS search results



3.3 Environmental background

3.3.1 Soils and geology

The study area is situated within the Glenorie soil landscape (eSpade 2015). Given that Glenorie soils are typically shallow and prone to erosion from ground disturbance, the potential for archaeological deposits to be present below ground surfaces in areas where development has occurred is low (eSpade 2015). Additionally, due to the acidic nature of these soils, organic materials are unlikely to have been preserved, meaning that any present Aboriginal objects would most likely be restricted to stone artefacts.

The Glenorie landscape does not typically contain the raw material utilised by Aboriginal groups for stone toolmaking and manufacturing processes. Additionally, stone outcrops and scarps are relatively infrequent within this soil landscape, reducing the potential for shelter or quarrying sites to be present. Additionally, the land surrounding the study area contains a greater number of rocky outcrops and benches, particularly of sandstone, which are more suitable as engraving/grinding sites and shelters, and this is reflected in the distribution of AHIMS sites discussed earlier in this report.

3.3.2 Hydrology and landforms

The natural topography of the study area and the region surrounding it consists of low, rolling to steep hills. However, much of the land within and surrounding the study area has been modified by historical developments in the region resulting in some artificial terraces throughout the landscape. The undulating terrain has resulted in numerous drainage lines that support both ephemeral and permanent watercourses. The closest such watercourse, a likely ephemeral first order stream, is approximately 170m north of the study area at its closest point. Another ephemeral watercourse, Blackbutt Creek (a second order stream) is located approximately 400m south of the study area. Given that both watercourses are ephemeral, they are unlikely to have served as a reliable source of freshwater or aquatic resources for Aboriginal groups within the region.

3.3.3 Historic land disturbance

Pymble Ladies' College was opened on this site in 1916 as the Presbyterian Ladies' College, Sydney with an initial student body of 60 pupils (Pymble Ladies' College, n.d.). By 1930, several buildings had been constructed on the College site and significant portions of land had been cleared, although the study area remained clear of development (Figure 4). Over the following decades, the College's student body and footprint increased dramatically in size and the Robert Vickers Building, the Dorothy Knox Building, and a concrete amphitheatre were present within the study area by 1971 (Figure 5). The late-twentieth century saw the continued development of the campus and the College's name change to Pymble Ladies' College. By 2004, the Isabel McKinney Harrison Centre was also constructed within the study area (Figure 6). The development of Pymble Ladies' College and the buildings constructed within the study area are likely to have caused significant ground disturbance to the study area, significantly minimising the potential for Aboriginal objects to be present.

Figure 4: 1930 aerial photograph

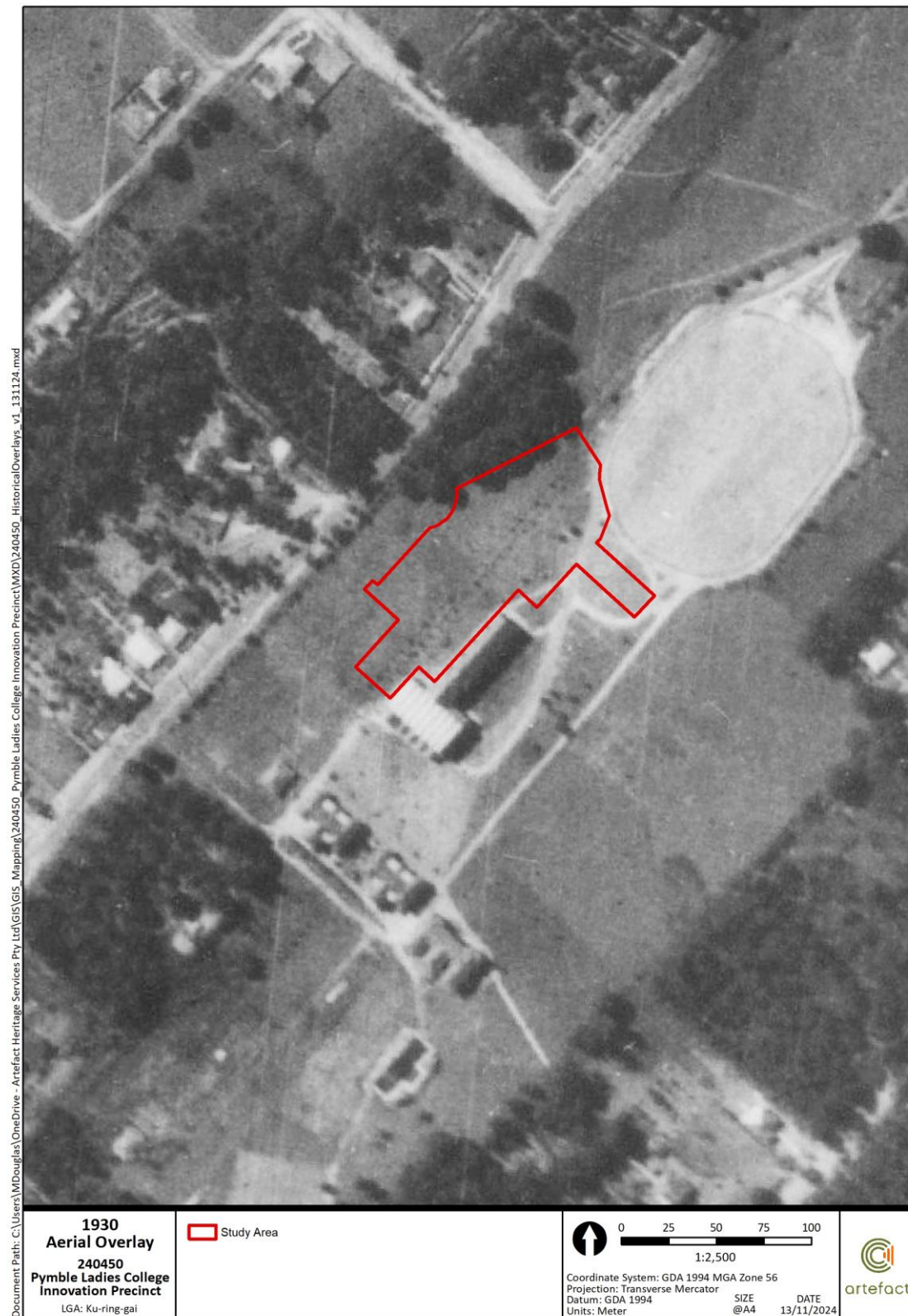


Figure 5: 1971 aerial photograph



Figure 6: 2004 aerial photograph



3.4 Predictive model

The ATR prepared to inform this assessment contained a predictive model that comprised a series of statements regarding the nature and distribution of Aboriginal land use that is expected in the study area. Based on a synthesis of information from the results of desktop research, landscape context and previous archaeological assessment inside and surrounding the study area, the following predictive statements are made:

- Developments to the Pymble Ladies' College campus are likely to have significantly altered ground surfaces and soil profiles within the study area.
- Art and grinding sites are amongst the most frequent Aboriginal sites observed in this region of Sydney due to the abundance of sandstone outcroppings in this area. However, based on the significant amounts of development within the study area and its situation within the Glenorie soil landscape (which is not conducive to the presence of rock outcrops generally), there are unlikely to be any of these sites within the study area. However, any natural sandstone surfaces within the study area should still be inspected for the presence of rock engravings and grinding grooves.
- Given the significant levels of development that have occurred within the study area and the shallow erodible character of its natural soil profile, there is nil-low potential for Aboriginal objects to be present within the study area on or beneath ground surfaces.
- The study area was extensively cleared prior to the 1930s, meaning that there is nil potential for culturally modified trees to be present.
- Areas which have the potential to contain subsurface archaeological deposits (PAD) are unlikely to be present in the study area due to generally thin soil profiles and the site's history of ground disturbance.

4.0 SUMMARY OF FIELD INVESTIGATIONS

An archaeological survey of the study area was completed on 3 December 2024. In attendance were Samuel Sammut (Heritage Consultant), Jonny Love (Heritage Consultant) and Neve Penklis (Graduate Heritage Consultant), all of Artefact Heritage. A pedestrian survey of the study area was completed in accordance with the Code of Practice and a photographic record was kept.

The study area was compromised of several large school buildings and multiple flower beds with introduced vegetation (Figure 7). These structures cut into a steep slope which was cleared and levelled for construction. Furthermore, the study area demonstrated additional land modification as the majority of the school grounds were surfaced with concrete and brick walkways, roads and staircases (Figure 8-Figure 10). The study area also demonstrated a considerable amount of subsurface disturbance across the whole site. Evidence of subsurface services were present across the entire study area including numerous drainage grates cut into the concrete and brick surfaces, in addition to, exposed plastic and concrete pipes, particularly in the western portion of the study area. Across the surveyed area, the soil was largely mixed and often contained gravel or other stones (Figure 11 and Figure 12), suggesting significant amounts of soils had been imported.

Along the northwest boundary of the study area a steep slope graded downwards into a gully that contained an ephemeral water source, which was situated approximately 10m beyond the study area (Figure 13-Figure 16). The presence of this slope and gully were unexpected and are much more prominent in reality than they appeared on the available mapping. While the presence of a watercourse in proximity to the study area generally suggests Aboriginal archaeological sensitivity, prior archaeological investigations in the Sydney area suggest that archaeological contexts are unlikely to occur in association with this watercourse due to its minor and ephemeral nature. Additionally, the slope leading down to the study was located on a steep gradient.

No Aboriginal objects or sites were identified during the survey, nor were there any areas of archaeological potential. The background research found it was unlikely that the study area would have served as an area of focused Aboriginal land-use, or that evidence of occupation would have been retained due to significant levels of historic disturbance and landscape modification. The survey confirmed that there is limited potential for Aboriginal objects or sites to be present.

Figure 7: Evidence of widespread development and difference in ground levels



Figure 8: Partial overview of study area, view to the northeast. Buildings to be demolished.



Figure 9: Evidence of surface and subsurface impacts

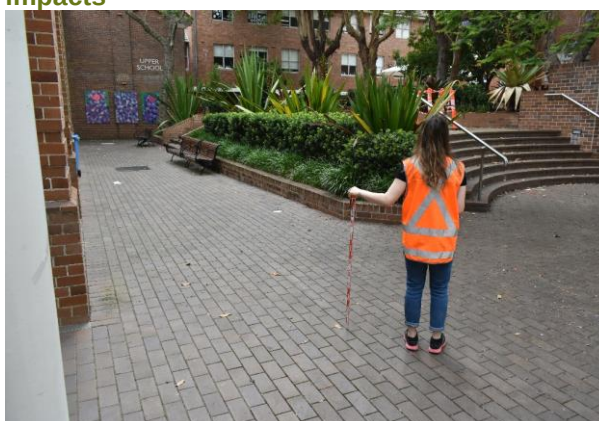


Figure 10: Partial overview of study area, view to the northwest. Buildings to be demolished



Figure 11: Mixed soils with low visibility



Figure 12: Non natural vegetation with low exposure and visibility



Figure 13: Gully at northwest edge of site. Not shown on ariel maps of the site



Figure 14: Cement pipe showing further evidence of deep subsurface impacts



Figure 15: Land modifications of steep slope, including soil disturbance with plastic pipe and ground leveling for road



Figure 16: Further evidence of extensive development with a west view. Building to be demolished



Effective survey coverage is outlined in Table 5, and landform survey coverage is outlined in Table 6. Visibility and exposure were overall poor (approximately 3% and <1% respectively). In accordance with the requirements contained in the Code of Practice, visibility and exposure levels within the study area have been rounded to zero due to the observed level being <5%.

Table 5: Effective survey coverage

Survey Unit	Landform	Survey unit area (m ²)	Visibility (%)	Exposure (%)	Effective Survey Coverage (m ²)	Effective Coverage (%)
1	Disturbed terrain	9,309	0	0	0	0

Table 6: Landform survey coverage

Landform	Landform area (m ²)	Area effectively surveyed (m ²)	% of landform effectively surveyed	Number of sites
Disturbed terrain	9,309	0	0	0

5.0 CULTURAL HERITAGE VALUES

5.1 Methodology

The cultural assessment in this report includes information collected through desktop assessment, archaeological survey and Aboriginal community consultation undertaken in accordance with the Consultation Requirements. This information was collected by Sammuel Sammut (Heritage Consultant, Artefact Heritage).

5.1.1 Cultural landscape

The World Heritage Convention of United Nations Educational, Scientific and Cultural Organisation (UNESCO) defines a cultural landscape as one which has 'powerful religious, artistic or cultural associations of the natural element rather than material cultural evidence, which may be insignificant or even absent' (UNESCO 1991). The relationship between Aboriginal Australians and the land is conceived in spiritual terms rather than primarily in material terms (Andrews et al 2006). Aboriginal cultural knowledge has been defined as:

Accumulated knowledge which encompasses spiritual relationships, relationships with the natural environment and the sustainable use of natural resources, and relationships between people, which are reflected in language, narratives, social organisation, values, beliefs and cultural laws and custom (Andrews et al 2006).

Aboriginal cultural knowledge was traditionally bequeathed through oral traditions from generation to generation. Within all Aboriginal communities there was a time of dislocation and upheaval associated with the arrival of colonial settlers. This widespread disruption resulted in much of the detailed knowledge and understanding of many of the elements of the cultural landscape being lost from the Aboriginal community, nonetheless many Aboriginal people maintain a strong connection to the land of their ancestors and collectively possess a wealth of knowledge passed down through the generations.

5.1.2 Types of values

Aboriginal people hold significant knowledge about traditional use of land before and after contact. The landscape which encompasses the study area has cultural value of importance to the Aboriginal community. The Aboriginal community collectively holds values and knowledge that relate to:

- Traditional values: these are passed down by family and community as part of ancient tradition.
- Historical values: these are passed down by family and community and relate to the eras since colonisation; these may include information gained from historical source documents.
- Contemporary values: these are values of modern importance and relevance for Aboriginal stakeholder groups.

There is often no clear separation between these values, and they collectively co-exist with equal importance in forming the value that Aboriginal people place on landscape, cultural heritage, intangible heritage, and particular landforms or parts of the landscape.

5.2 Identified Aboriginal cultural heritage values

Table 7 provides a summary of the Aboriginal cultural heritage values associated with the study area.

Table 7: Cultural heritage values identified for the study area and surroundings

Cultural heritage value	Description	Source
Aboriginal occupation	Aboriginal people have lived in the local areas for thousands of years and hold a deep connection to the land	Background research
Pathways	The Pymble Ladies' College campus may have formed part of a pathway used by Aboriginal groups travelling southwards from Bobbin Head	Ku-ring-gai Council, 2018; Thorne, 1968;
European contact	Records by Robert Pymble, owner of the Pymble estate in the nineteenth century, described Aboriginal people camping on a hill above his orchard and bringing him fresh fish and oysters	Halstead, 1982; History of Aboriginal Sydney, 2013; Ku-ring-gai Council, 2018

5.3 Aboriginal cultural values within the study area

Background research has demonstrated that Aboriginal people have occupied the region around the study area for tens of thousands of years, while many Aboriginal people believe that they have been living on country since 'time immemorial'. While the broader region is significant to Aboriginal people through their connection to the land, no specific cultural values have been associated with the study area. Additionally, it is unlikely that Aboriginal objects that may hold cultural significance will be present in the study area due to previous historical disturbance.

No cultural heritage values for the study area or its surrounds were identified by RAPs as part of the consultation process.

6.0 SIGNIFICANCE ASSESSMENT

A significance assessment of the scientific, social, historic and aesthetic values of the study area is included below.

6.1 Significance assessment criteria

An assessment of the cultural heritage significance of an item or place is required in order to form the basis of its management. The Guide (OEH 2011: 10) provides guidelines, in accordance with the Burra Charter (Australia ICOMOS 2013) for significance assessment with assessments being required to consider the following criteria:

- Social values – does the area have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons
- Historic values – is the area important to the cultural or natural history of the local area and/or region and/or state
- Scientific values - does the area have the potential to yield information that will contribute to an understanding of the cultural and natural history of the local area and/or region and/or state
- Aesthetic values – is the area important in demonstrating aesthetic characteristics in the local area and/or region and/or state.

Scientific values should be considered in light of the following criteria:

- Research potential - does the evidence suggest any potential to contribute to an understanding of the area and/or region and/or state's natural and cultural history?
- Representativeness - how much variability (outside and/or inside the subject area) exists, what is already conserved, how much connectivity is there?
- Rarity - is the subject area important in demonstrating a distinctive way of life, custom, process, land-use, function or design no longer practised? Is it in danger of being lost or of exceptional interest?
- Education potential - does the subject area contain teaching sites or sites that might have teaching potential?

It is important to note that heritage significance is a dynamic value.

6.1.1 Historic value

Historic values refer to the association of place with aspects of Aboriginal history. Historic values are not necessarily reflected in physical objects, but may be intangible and relate to memories, stories or experiences.

No specific historic values have been identified within the study area, and it is assessed as being unlikely that any are present. Additionally, no specific historic values were identified by RAPs as part of the consultation process.

6.1.2 Aesthetic value

Aesthetic values refer to the sensory, scenic, architectural, and creative aspects of the place. These values may be related to the landscape and are often closely associated with socio/cultural values.

No specific aesthetic values have been identified within the study area and it is assessed as being unlikely that any are present. Additionally, no specific aesthetic values were identified by RAPs as part of the consultation process.

6.1.3 Socio/cultural value

Socio/cultural heritage values should be addressed by Aboriginal people who have a connection to, or interest in, the area.

No specific socio/cultural values have been identified within the study area as a result of the background research and consultation to date. Additionally, no specific socio/cultural values were identified by RAPs as part of the consultation process.

6.1.4 Scientific value

No Aboriginal objects or sites were identified within the study area, and due to the significant levels of disturbance that have occurred across the campus, it is unlikely that any would be present. Therefore, based on the evidence presented in the ATR prepared as part of this ACHAR the study area possesses nil scientific value.

6.2 Statement of significance

The study area has been disturbed by the development of the Pymble Ladies' College campus, and no Aboriginal sites or potential for Aboriginal objects have been identified within the study area. Due to this, the study area has no Aboriginal cultural heritage significance (Table 8).

Table 8: Significance assessment

Site name (AHIMS ID)	Research potential	Representativeness	Rarity	Education potential	Overall significance assessment
No AHIMS sites	None	None	None	None	None

7.0 IMPACT ASSESSMENT

7.1 Proposed works

The proposed development includes the demolition of existing structures located within the study area, landscaping to facilitate the development of the site, the construction of a campus green area and multi-storey structure, as well as the installation of gardens and vegetated areas, and services necessary for the operation of the new structure. Plans for the proposed development are contained below in Figure 17-Figure 19.

7.2 Aboriginal heritage impact

As there are no Aboriginal objects or sites within the study area, the proposed works would have no impact on tangible Aboriginal heritage.

Figure 17: Proposed works in relation to study area

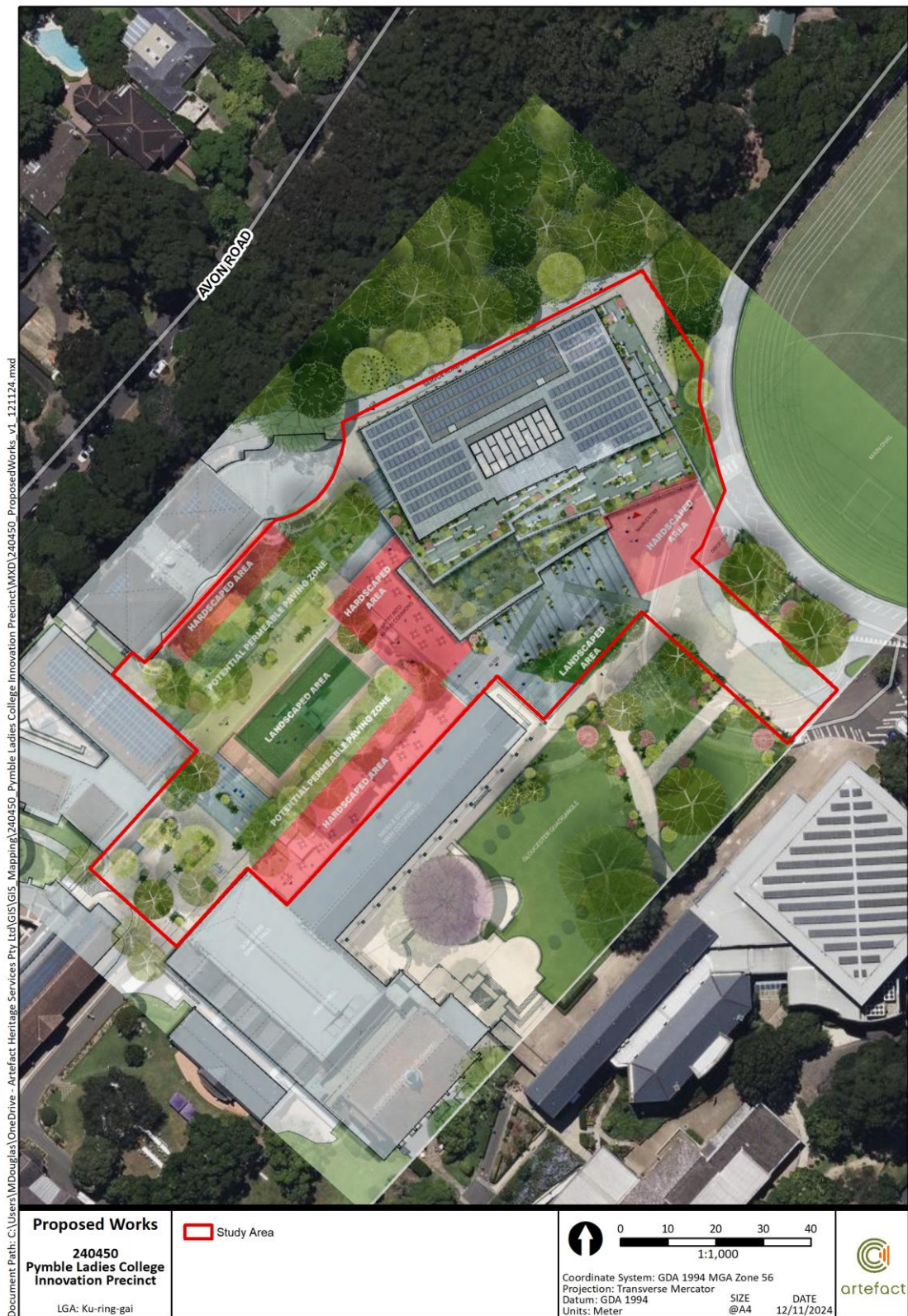
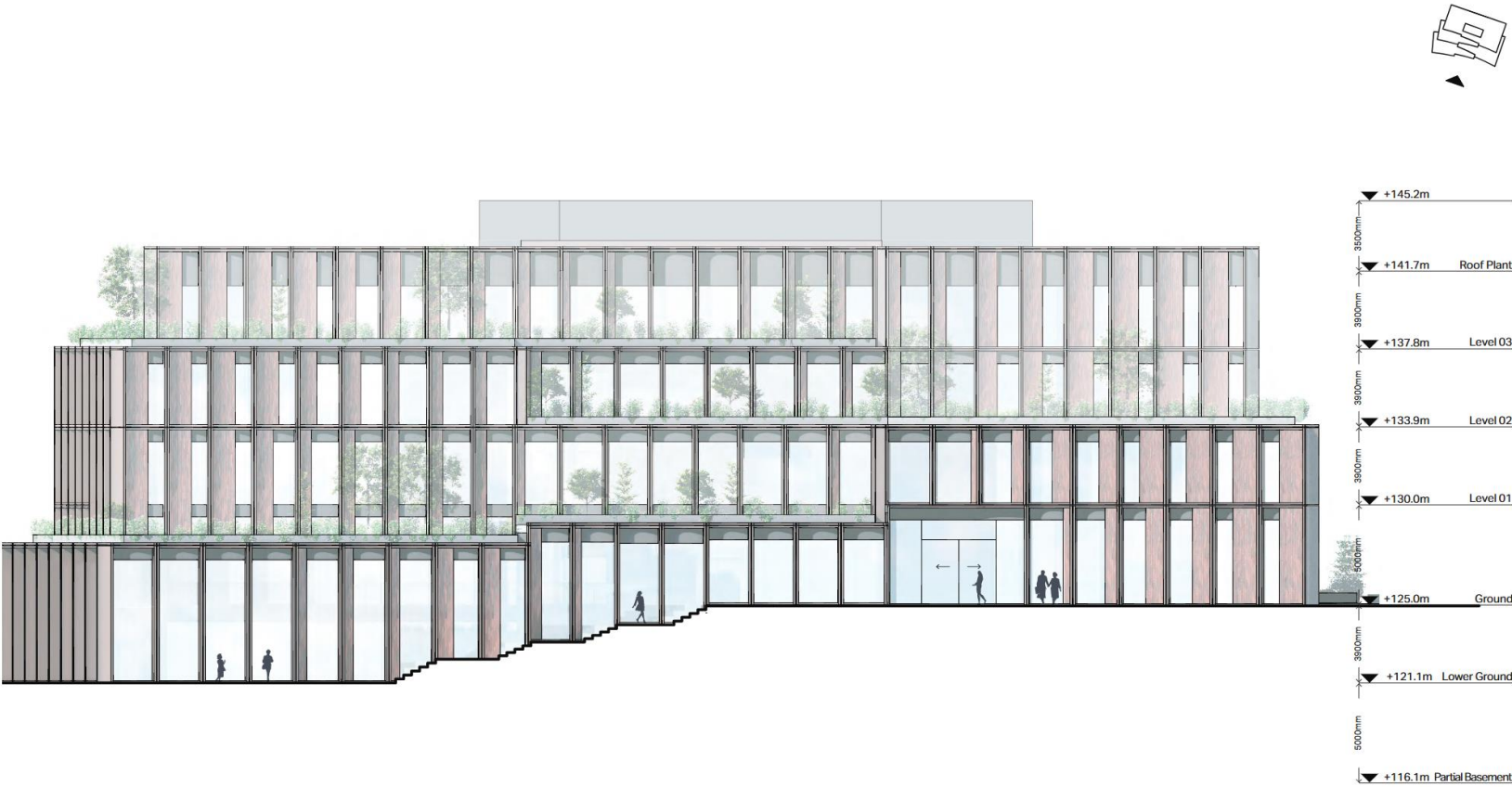


Figure 18: Innovation Precinct south elevation plan



South Elevation 1:200

0 1 5 10m

Figure 19: Secondary Innovation Precinct north-south section plan



NS Section 1:200

0 1 5 10m

7.3 Ecological Sustainable Development principles

The Guide (OEH 2011) specifies that Ecological Sustainable Development (ESD) principles must be considered when assessing harm and recommending mitigation measures in relation to Aboriginal objects.

The following relevant ESD principles are outlined in Section 3A of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*:

- Decision-making processes should effectively integrate both long term and short term economic, environmental, social and equitable considerations (the 'integration principle')
- If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation (the 'precautionary principle')
- The present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations (the 'principle of intergenerational equity').

7.3.1 The integration principle

Decision making processes should effectively integrate both long term and short term economic, environmental, social and equitable considerations (the 'integration principle'). The preparation of this ACHAR demonstrates regard for the integration principle by considering Aboriginal heritage values and impacts to these from the proposal during the planning phase. The nature of the proposal is in itself one that contributes to the long term economic and social needs of current and future residents of the area.

7.3.2 The precautionary principle

If there are threats of serious or irreversible environmental damage, lack of full scientific confidence should not be used as a reason for postponing measures to prevent environmental degradation (the 'precautionary principle'). This ACHAR has been prepared to the Code of Practice therefore has met the industry standards for scientific confidence and has determined that there are no Aboriginal sites or potential for Aboriginal objects within the study area.

7.3.3 The principle of intergenerational equity

The proposed works would adhere, as close as possible, to the principle of intergenerational equity by collating scientific and cultural information on former Aboriginal occupation of the study area through the previous investigations and this ACHAR. The ATR prepared an assessment of the study area and synthesised the regional character of Aboriginal objects and sites for posterity and future generations.

7.4 Cumulative impacts

A cumulative impact is an impact on Aboriginal cultural heritage resulting from the incremental impact of the action/s of a development when added to other past, present and reasonably foreseeable future actions. As the study area has been impacted by previous development, no further cumulative impacts are possible.

8.0 MANAGEMENT AND MITIGATION MEASURES

8.1 Guiding principles

The overall guiding principle for cultural heritage management is that where possible Aboriginal sites should be conserved.

Where unavoidable impacts occur then measures to mitigate and manage impacts are proposed. Mitigation measures primarily concern preserving the heritage values of sites beyond the physical existence of the site. The most common methods involve detailed recording of Aboriginal objects, archaeological test and salvage excavations, artefact analysis and, where appropriate, reburial of Aboriginal objects in a location determined by the RAPs.

Mitigation measures vary depending on the assessment of archaeological significance of a particular Aboriginal site and are based on its research potential, rarity, representatives and educational value. In general, the significance of a site would influence the choice of preferred conservation outcomes and appropriate mitigation measures, usually on the following basis:

- Low archaeological significance – conservation where possible. SSD Conditions of Approval would be required to impact the site before work can commence
- Moderate archaeological significance – conservation where possible. If conservation was not practicable, further archaeological investigation would be required such as salvage excavations or surface collection in accordance with the SSD Conditions of Approval.
- High archaeological significance – conservation as a priority. Where all other practical alternatives have been discounted mitigation measures such as comprehensive salvage excavations in accordance with the SSD Conditions of Approval would be required.

This report has determined that Aboriginal objects are unlikely to be present within the study area. As such, no mitigation measures are proposed. Any unexpected Aboriginal objects encountered during the development would be managed under an unexpected finds policy.

8.2 Management measures

As no Aboriginal objects or areas of archaeological potential have been identified within the study area, it is unlikely that Aboriginal objects are at risk of being harmed. Therefore, no mitigation measures are proposed to offset the consequence of harm to Aboriginal objects.

Unexpected finds must be managed through an unexpected finds policy. An unexpected finds policy would outline the protocols necessary in the event that any unexpected Aboriginal objects, sites or archaeological deposits are identified during the works. This policy should be presented to project personnel as part of site inductions for the project.

8.3 Changes to the project area

Advice provided within this ACHAR is based upon the most recent information provided by the proponent at the time of writing. Any changes made to the project should be assessed by an archaeologist in consultation with the RAPs. Any changes that may impact on Aboriginal sites not assessed as part of the project may warrant further investigation and result in changes to the recommended management and mitigation measures.

9.0 CONCLUSION

9.1 Summary of findings

This report has identified the following:

- No AHIMS sites were identified within the study area
- No Aboriginal objects or sites were identified during the archaeological survey and the study area demonstrated significant levels of disturbance
- It is unlikely that Aboriginal objects will be present within the study area due to the significant levels of disturbance caused by the development of the Pymble Ladies' College campus across the twentieth century
- No specific cultural heritage values have been identified for the study area through background research

9.2 Recommendations

Based on the above conclusions, the following recommendations are made:

- No mitigation measures are necessary due to the absence of Aboriginal objects, sites and cultural heritage values for the study area, and the lack of potential for Aboriginal objects to be present.
- An unexpected finds policy outlining the protocols to be followed in the event that unexpected Aboriginal objects are encountered during the works must be prepared and presented to project personnel during site inductions.

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APPENDIX A – TECHNICAL REPORT

Redacted from public display

APPENDIX B – CONSULTATION RECORDS

Redacted from public display



artefact

Artefact Heritage and Environment

ABN 73 144 973 526

Suite 56, Jones Bay Wharf

26-32 Pirrama Road

Pymont NSW 2009 Australia

+61 2 9518 8411

office@artefact.net.au

www.artefact.net.au