

Unearthed

Archaeology & Heritage

3rd August 2018

Department of Planning and Environment and Office of Environment and Heritage
c/o: Ms Jacqueline Parker
Director
Urbis
By email: jparker@urbis.com.au

To Whom It May Concern

Aboriginal Cultural Heritage Assessment Report: Cranbrook School, Bellevue Hill

The Secretary's Environmental Assessment Requirements for the proposed Cranbrook School redevelopment dated 10th November 2017 does not make specific reference to Aboriginal cultural heritage. However, Susan Harrison of the Office of Environment and Heritage (OEH) provided a response to the "Notice of Exhibition of Cranbrook School Redevelopment – SSD 8812" dated 31st May 2018. In that response, OEH provides the following recommendations:

OEH considers that the scope of the excavation works is significant, extending far beyond the oval's original fill area and given there are two known Aboriginal sites within 1km of the site (EIS reference section 6.11.2). OEH recommends that an Aboriginal Cultural Heritage assessment report should be undertaken to support this development.

OEH also considers that there is likely to be significant cultural heritage values and Aboriginal peoples associations with this site given its proximity to Sydney Harbour which need to be explored in consultation with the Aboriginal community.

In this regard, OEH recommends the EIS identify and describe the Aboriginal cultural heritage values that exist across the whole area that will be affected by the development. This may include the need for surface survey and test excavation. The identification of cultural heritage values must be conducted in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (OEH 2010), and guided by the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (DECCW 2011) and consultation with OEH regional branch officers. OEH also recommends consultation is undertaken in accordance with Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW) and documented in the Aboriginal Cultural Heritage Assessment Report.

As such, Unearthed Archaeology & Heritage were engaged by Cranbrook School on 30th July 2018 to undertake the following with regards to proposed works at Cranbrook School:

- An Aboriginal Archaeological Assessment in accordance with the Office of Environment & Heritage (OEH)'s *Code of Practice for the Investigation of Aboriginal Objects in NSW*,
- Consultation in accordance with OEH's *Aboriginal cultural heritage consultation requirements for proponents 2010*; and
- Preparation of an Aboriginal Cultural Heritage Assessment Report (ACHAR) in accordance with OEH's *Aboriginal cultural heritage consultation requirements for proponents 2010* and *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*.

The background research for the Aboriginal archaeological assessment to understand the potential archaeological deposits and subsequent disturbance that may have impacted upon those potential archaeological deposits, has commenced. The archaeological assessment includes background research into the study area, a site inspection and preparation of a report which contains a significance assessment of the potential Aboriginal archaeological deposit within the study area, an assessment of the impacts of the proposed redevelopment, mitigation measures and management recommendations.

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Once the archaeological assessment has been completed and an understanding of the potential archaeological deposits has been gained, consultation in accordance with OEH's *Aboriginal cultural heritage consultation requirements for proponents 2010* will be undertaken and the ACHAR prepared. Then it is likely that test excavations in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (OEH 2010) will be required.

The consultation requirements provide strict statutory timeframes and therefore can take between 4 and 6 months to complete. As such, Urbis and Cranbrook School are seeking a deferral of the requirement to produce an ACHAR, which identifies and describes the Aboriginal cultural heritage values across the study area, as a condition to be complied with prior to issue of a Construction Certificate, so that the SSDA can be issued.

To that end, Urbis and Cranbrook School have requested that I write to you to indicate that Unearthed Archaeology & Heritage have been engaged to undertake the archaeological assessment, consultation and preparation of the ACHAR and that these works have commenced and will be ongoing .

Yours sincerely



Tory Stening

Director/Archaeologist/Project Manager