
CULTURAL RESOURCE ASSESSMENT, PLANNING AND MANAGEMENT

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Dear Adrian

RE: AMENDED PART 3A APPLICATION FOR DETENTION BASIN 6, FORMER HOXTON PARK AIRPORT

It is understood Mirvac propose to submit an amended Part 3A application for the Detention Basin 6. The Detention Basin formed part of the MDCA [Mary Dallas Consulting Archaeologists] Aboriginal archaeological assessment report of the Part 3A lands in the former Hoxton Park Airport Site currently being developed by Mirvac. The full reference of the report is as follows:

Mary Dallas Consulting Archaeologists February 2010. *Aboriginal Archaeological Assessment and Management Plan. Proposed Industrial/Commercial Development, Former Hoxton Park Airport Site, Hoxton Park, NSW.* Report to Mirvac Group.

The report contained an Aboriginal archaeological assessment of the potential impacts of future industrial/commercial subdivision and development of the site, as indicated in **Figure 4** of that report [MDCA 2010: 15]. The development proposal assessed in the report included the construction of bulk warehouse facilities as well as the construction of a road/bridge link to the development area across Hinchinbrook Creek from Cowpasture Road and the construction of a Detention Basin in the western portion of the land adjoining the M7. The proposal was to be assessed as a 'major project' under Part 3A of the Environmental Planning & Assessment Act 1979 (as amended).

The current application will also be assessed under the Part 3A process, therefore the MDCA February 2010 report remains valid. Detailed design plans for the Detention Basin have now been developed which represent a minor alteration in the configuration of the Basin. Specifically, the Basin has expanded approximately 40m to the east [reducing a future residential subdivision, along its south western boundary] and contracted in the south [see **Figure A** below]. The proposed spillway will discharge into an existing tailout cut through to Hinchinbrook Creek. The area added to the Detention Basin along its eastern side has been assessed as part of a separate Aboriginal Cultural Heritage Assessment. The full reference of that report is:

Mary Dallas Consulting Archaeologists April 2010. *Aboriginal archaeological assessment and Management Plan Proposed Residential Development in the North of the Former Hoxton Park Airport Site, Hoxton Park, NSW.* Report to HPAL Freehold Pty Limited

The MDCA April report identified no Aboriginal cultural heritage items within the area which is now part of the expanded Detention Basin. The added area contains remnants of the former airstrip and a drainage channel. It is noted that the existing tailout is located within HP PAD 1,



an extensive area to the east of the Airport along relatively undisturbed portions of Hinchinbrook Creek. The assessment included Aboriginal community consultation and their participation in the development of the Archaeological Management Plan.



Figure A. (amended from Figure 2 of the MDCA 2010 report). The original report study area (yellow outline), showing the current detention Basin configuration (shaded red : note expansion to east of original survey area and tailout). The green outlined area represents relatively undisturbed lands defined as HP PAD 1 along Hinchinbrook Creek within the former airport site but east of the main wholly disturbed runway area.



The MDCA February 2010 report considered the potential Aboriginal heritage sensitivity of the then proposed Detention Basin, the commercial and industrial subdivision and the Hinchinbrook Creek corridor. The study undertook required Aboriginal community consultation, conducted archaeological field survey of the area of proposed impact (including the involvement of the local Aboriginal community), assessed the likely Aboriginal heritage potential of the area, prepared an Aboriginal Archaeological Management Plan to guide future works within the area and submitted this as part of the final report which was endorsed by Registered Aboriginal Stakeholder groups. That study found there was a Aboriginal artefact scatter [DECCW AHIMS Site # 45-5-0786 (HP1)] located beside a channelised portion of a creek which courses under the former Airstrip and, via an excavated channel on the eastern side of the Airstrip joins Hinchinbrook Creek.

The site had been located over twenty years ago and has been re-inspected several times to date. Two of the archaeologists who re-inspected the site in 1996 noted "extensive" bulldozed scrapes across the northern flanks of the creek [Brayshaw and Rich [1996: 31]. These excavations are visible on the 1947 and to a lesser extent on the 1978 aerial photographs presented in the MDCA February 2010 report. Given its low to negligible scientific potential an appropriate management strategy would be to collect the artefacts at this location. The strategy to monitor the excavation works associated with the Detention Basin and collect and record any artefacts identified prior to and during the excavation works was endorsed by the registered Aboriginal stakeholder groups.

In addition the study identified the HP PAD 1 along the Hinchinbrook Creek corridor and noted the presence of a number of existing tailouts. The area [creek corridor] which is traversed by the existing tailout associated with the overflow from the proposed spillway was assessed in the MDCA April report. The corridor of Hinchinbrook Creek is assessed having archaeological potential [PAD] and will require further archaeological investigation if the tailout were to be widened or deepened as part of the Detention Basin works. Recommendations for the management of the creek corridor including any works associated with the existing tailouts were presented in the February report.

Given that the current Basin configuration is different to that assessed in the original survey additional Aboriginal community consultation was undertaken.

Each of the Aboriginal stakeholder organisations, the Gandangara Local Aboriginal Land Council (GLALC), Darug Tribal Aboriginal Corporation (DTAC), the Darug Custodians Aboriginal Corporation (DCAC) and the Darug Aboriginal Cultural Heritage Assessments (DACHA)¹ were consulted on the new configuration and offered the opportunity to revisit the site and inspect the new route. All groups felt further field survey was not warranted as the earlier recommendations and Archaeological Management Plan still applied. All groups asked that they be kept informed and included in the monitoring program associated with the Basin excavations.

The Detention Basin is being assessed under Part 3A as a separate proposal. The MDCA February 2010 report covers the Aboriginal heritage issues relating to the proposal and can be submitted in full with this letter in support of the separate proposal.

This letter therefore highlights the relevant portions of the MDCA February 2010 report which relate to the current Detention Basin 6 proposal as a ready reference for reviewing the report in the context of this separate proposal.

Planning Context – this remains unchanged from that outlined in **Section 1.4** of the report.

¹ The following individuals were contacted: Caroli-anne Flanagan of the GLALC; Gordon Morton of DACHA; Leanne Watson of the DCAC; and, Sandra Lee of the DTAC.

Aboriginal Community Consultation – Aboriginal community consultation was undertaken for the report according to current DECCW Part 3A Assessment Guidelines² as outlined in **Section 1.5** of the report. Specifically this included public notification and direct consultation as per those guidelines and the identification of Registered Aboriginal Stakeholder groups for the project. Registered Aboriginal Stakeholders were involved in the archaeological survey of the current road/bridge proposal area. Letters of endorsement from the Registered Aboriginal Stakeholders for the Aboriginal Archaeological Management Plan in the report (which includes specific and separate management for the Detention Basin area) is included as **Appendix 2** to the report. Further consultation with Registered Aboriginal Stakeholders on the re-configuration has been noted above and endorsed a second time.

Environmental, Historical and Archaeological Context – this is outlined in **Sections 2 & 3** of the report and remains valid and unchanged since the time of writing.

Archaeological Field Survey and Assessment – this is described in **Section 4** of the report. It is noted that the area of the road/bridge proposal was examined and described separately in that report as 'Survey Unit 2' (see **Section 4.2, Figure 15-17 and Section 4.3.2 pages 42ff** of the report). The assessment of the Aboriginal archaeological sensitivity of this area is documented in **Section 5.2.2**. It is noted that historical aerial photography and survey observations clearly show the area to comprise disturbed and disrupted surfaces and sub-surfaces.

Aboriginal Archaeological Management Plan – the Aboriginal Archaeological Management Plan contained in the report was formulated to provide best practice heritage management for the known and potential Aboriginal archaeological remains within the examined area. Given the prior identification of a low density scatter of artefacts [DECCW AHIMS Site 45-5-0786, specific management actions were devised for the specific area of the Detention Basin. Given the archaeological potential of the HP PAD 1 within the Creek corridor and east of the Airport eastern boundary fence specific management actions were recommended for any proposed impacts. These are as follows (unchanged from **Section 5.5** of the report):

- Mirvac Group afford the Registered Aboriginal Stakeholder groups, the GLALC, DTAC, DCAC and DACHA the opportunity to monitor earth works in the vicinity of **Site # 45-5-0786** and the proposed detention basin as per **Figure 25** and make a collection of any cultural items as may be unearthed. These actions should be undertaken in conjunction with initial earthworks and the Aboriginal stakeholder groups should be given adequate notice of when these are likely to commence.
- Mirvac Group undertake subsurface archaeological investigation in the form of test excavation of any portions of **HPA PAD 1**, proposed for impact, including the proposed M7-Cowpastures Road link road/bridge corridor and any possible future drainage works within the area of **HPA PAD 1**. These test excavations should precede any physical development works to the east of the current airstrip boundary fence. Dependent on the results of these test excavations, documented Aboriginal archaeological remains may be determined to require partial or total preservation or further partial or total salvage excavation.
- Any bushland regeneration or weed reduction program as may be proposed in the current Vegetation Management Plan [VMP] and which cover the Hinchinbrook Creek corridor would need to take into account registered Aboriginal sites and areas of archaeological potential, as outlined in **Figure 25**.

² Department of Environment and Conservation 2005. *DRAFT Guidelines For Aboriginal Cultural Heritage Impact Assessment and Community Consultation*.



- All proposed archaeological works, namely artefact collection, proposed monitoring of certain earthworks and archaeological test excavation and artefact archival storage, should be conducted according to the 'Strategy for Proposed Archaeological Investigations'. Contained in **Appendix 1** of this report and be undertaken in partnership with the Registered Aboriginal Stakeholder groups.
- MDCA submit a Statement of Commitments to the Mirvac Group reflecting the recommended Aboriginal heritage management actions specified in this Aboriginal Archaeological Management Plan [see below].
- Registered Aboriginal Stakeholder groups to supply formal written comments on the Aboriginal Archaeological Management Plan for submission to Department of Planning with the final Aboriginal Archaeological Assessment Report for the project [see Appendix 2].
- AHIMS Records of any impacted registered sites are to be updated and submitted the DECCW AHIMS Registrar. These records will note what the Registered Aboriginal Stakeholder groups agreed to with respect to long term storage of any collected artefacts.

Statement of Commitments – Aboriginal Heritage

The Mirvac Group will manage the Aboriginal Heritage on the Part 3A lands of the former Hoxton Park Airport site according to best archaeological practice and in consultation with a fully qualified archaeologist and the Registered Aboriginal Stakeholders, the GLALC, DTAC, DCAC and DACHA. The Aboriginal Archaeological Management Plan described in the current MDCA February 2010 report [Section 5.5], will form the basis of the heritage management.



Figure B. Proposed management of Aboriginal sites and area of archaeological potential within the Hoxton Part airport site. The area relating to the current Detention Basin proposal is outlined in white. Management relating to HPA PAD1 (the green shaded area) is as attached in Appendix 1 of the MDCA 2010 report.

(note: Figure B amended from Figure 25 of the MDCA 2010 report).



Summary and Conclusions

MDCA has evaluated the current Detention Basin 6 proposal as a part of a broader study of the former Hoxton Park airport site as detailed in the MDCA February 2010 report. As discussed above, the Aboriginal heritage management of the components of Detention Basin 6 remain unchanged from that assessed in the MDCA February 2010 report.

The recommended management of the DECCW Site #45-5-0786 and the HP PAD 1 is contained within an **Aboriginal Archaeological Management Plan** in the report, the relevant sections of which are reproduced above. The Management Plan has been endorsed by the Aboriginal community stakeholder groups involved in the assessment (letters of support are contained within **Appendix 2** of the MDCA February 2010 report). Additional consultation on the re-configuration was also undertaken.

Provided that:

- no future revisions to the location of the proposed Detention Basin 6 proposal corridor are made; and
- the recommended management actions in the report, including artefact collection at Site # 45-6-786 and archaeological test excavation within HP PAD 1, are undertaken ahead of proposed impacts under the methodology outlined in Appendix 1 of the report (as appended also to this letter)

MDCA do not consider that there is any requirement for the preparation of a revised or separate archaeological assessment in relation to the current Detention Basin proposal, nor is any further documentation required beyond the current letter and the original report.

Therefore if read in conjunction with the report, this letter contains sufficient information to appropriately manage the Aboriginal heritage potential of the current Detention Basin 6 proposal, and for the assessment of those impacts for planning purposes.

If you require any clarification or further information, please do not hesitate to contact us.

Yours sincerely,

Mary Dallas
Principal Heritage Consultant
MDCA
11.10.10