

30 August 2023

Nick Turner
Principal
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Dear Nick

Aboriginal due diligence advice: The Huntley Avondale, New South Wales

Our Ref: Matter: 39762

Biosis Pty Ltd (Biosis) has been commissioned by Turner Studio to provide preliminary Aboriginal and historical heritage advice to inform an application for Secretary's Environmental Assessment Requirements (SEARs) under Part 4 of the *Environmental Planning and Assessment Act 1979* for The Huntley, Avondale New South Wales (Lot 101 DP1247603, Lot 1 DP120957, Lot 1 DP415430, Lot 1 DP655151 and Lot 1 DP386238 (NSW) (the study area) (Figure 1 and Figure 2). The purpose of this advice is to assist in determining the level of assessment that will be required as part of the preparation of an Environmental Impact Assessment (EIA) for the project.

In order to prepare this advice, Biosis has undertaken the following tasks:

- Database searches of the: Aboriginal Heritage Information Management System (AHIMS) database, NSW State Heritage Register (SHR) and NSW Heritage Database, Commonwealth Heritage List (CHL) and Register of National Estate (RNE).
- Review of Schedule 5 of the *Wollongong Local Environmental Plan 2009* (LEP).
- Review of previous assessments and publications.

AHIMS

An extensive search of the AHIMS database was conducted on 28 August 2023 (Client service ID: 813699). The search identified 117 Aboriginal sites within a 3.5 kilometre search area, centred on the proposed study area (Table 1). None of these registered sites are located within the study area (Figure 3). The mapping coordinates recorded for these sites were checked for consistency with their descriptions and location on maps from Aboriginal heritage reports where available. These descriptions and maps were relied upon where notable discrepancies occurred.

Table 1 AHIMS Sites within the vicinity of the study area

Site type	Occurrences	Frequency (%)
Artefact	85	62.96
PAD	29	21.48
Art (Pigmented or Engraved)	11	8.15
Grinding groove	5	3.71
Stone arrangement	3	2.22
Aboriginal ceremony and dreaming	1	0.74
Modified tree	1	0.74
Total	135	100

A simple analysis of the Aboriginal cultural heritage sites registered within 3.5 kilometres of the study area indicates that the dominant site type is artefact, representing 62.96 % (n=85), followed by Potential Archaeological Deposit (PAD) at 21.48% (n=29), and art at 8.15% (n=11). Grinding groove represented 3.71% (n=5) and stone arrangement represented 2.22% (n=3). Both Aboriginal ceremony and dreaming and modified tree had the lowest site type frequency, representing 0.74% each (n=1 each).

A review of the reports held by AHIMS identified several archaeological studies have been undertaken within the locality of the study area. These include:

- Australian Museum Business Services (AMBS) (2006) *Aboriginal Heritage Management Plan: West Dapto Release Area Volume 1 and 2***. AMBS completed a heritage assessment and testing program of the wider West Dapto area, approximately 1 kilometre east of the study area. The survey inspected all landform present, identifying a total of 24 sites located along creek lines, alluvial flats, hillslopes and spur crests. Three stages of subsurface testing were completed, geomorphic testing, archaeological landform testing and town centre testing. It was identified that all landforms contained potential artefact bearing deposits. Testing of archaeological deposits identified 425 artefacts, recovered from creek catchments within hillslopes, alluvial flats, streams, and spur crest landforms. Further investigation of areas considered to have high archaeological value was recommended, in addition to salvaging sites that will be impacted by development.
- Biosis (2007) *Huntley Eco Park, Aboriginal Archaeological Assessment, NSW***. Biosis completed an archaeological assessment of this site in 2007, which includes the current study area. A survey of the site identified extensive disturbance from its historical use as a quarry. Artefact sites were identified within the eastern portion of the site (located outside of the current study area boundary) on a raised landform adjacent to water confluences. Several areas of moderate archaeological potential were also identified, with four areas of moderate archaeological potential located within the current study area boundary (Figure 4). Further investigation in areas of moderate archaeological potential was recommended. In addition to this, Allan Carriage of the Wadi Wadi Coomaditchie Aboriginal Corporation identified a potential birthing place associated with a cluster of marked fig trees, also located within the current study area. It was recommended that consultation with women from the traditional Aboriginal owners groups of the area should be completed to confirm the cultural significance of the area prior to development.
- AMBS (2010) *Preliminary Aboriginal and Historic Heritage Assessment: West Dapto Urban Release Area, NSW***. AMBS completed an Aboriginal and historic heritage assessment for the West Dapto Urban Release Area, which included the study area. This comprised of a desktop assessment. Archaeological sensitivity mapping was completed based on landforms and their association with previously recorded

sites. No archaeological potential was identified within the study area, however this was not ground truth by an archaeological survey.

- **Niche (2011) Planning proposal for the Former Huntley Colliery Site and Adjacent Lands, Avondale Road, Avondale, NSW. Aboriginal Cultural Heritage Assessment Report (ACHA).** Niche completed an ACHA following Biosis Huntley Eco Park assessment (2007), located immediately east of the study area. This assessment excluded the land located within the current study area boundary. Test excavations were completed within areas of moderate archaeological potential and a range of landforms within the site, but were located outside of the current study area boundary. Six new archaeological sites were identified. The following observations were also made based on landform testing: Hill top areas, parts of flats subject to agricultural use and the area around the existing house have low sensitivity, river flats are sensitive on higher terraces, the ridge to the south east of the mine is sensitive in open depression landforms and the flat at the foot slope base of Avondale 1 is sensitive. It was determined that development within areas of moderate sensitivity and recorded sites will require an Aboriginal Heritage Impact Permit (AHIP).
- **GML Heritage (2017) West Dapto 2 Release Area Aboriginal Cultural Heritage Assessment Report.** GML completed a heritage assessment and testing for the West Dapto 2 release area between Bong Bong Road and Cleveland Road, located approximately 1.5 kilometres north east of the study area. Areas of archaeological potential and Aboriginal sites were identified within walking routes along ridgelines down from the escarpment, upper slope landforms with views and level areas adjacent to water courses. Test excavations identified 348 artefacts, with the highest densities identified predominantly in flat and crest landforms. Artefacts were also identified on slope landforms, however contained lower artefact density. Geophysical testing was undertaken which identified that creek flat landforms held high archaeological potential, raised flats had moderate archaeological potential and hilltops and lower slopes had low archaeological potential.
- **Biosis (2020) Cleveland Road Upgrades Aboriginal Cultural Heritage Assessment.** Biosis completed a heritage assessment including test excavations at Cleveland Road, located approximately 1.2 kilometres east of the study area. A previously recorded low density artefact scatter and two areas of PAD were investigated, and six additional areas of PAD were identified during the field investigation. These areas of PAD were identified within alluvial terraces and hill slopes located within close proximity to a third order creek line. Test excavations within these areas of PAD did not identify any Aboriginal sites or objects. This was determined to be due to prior disturbances along the road corridor removing archaeological deposits.

Previous assessments located within and in the vicinity of the study area have identified that local landforms hold archaeological sensitivity. Biosis' (2007) assessment identified four areas of archaeological potential to be present within the study area (Figure 4). Niche (2011) conducted testing within areas of potential located to the east of the study area and identified a number of sites to be present. Archaeological testing has not been completed within the current study area. Based on the findings of Niche (2011), it is likely that unrecorded sites are present within the study area.

Wollongong LEP and other register searches

A search of Schedule 5 of the Wollongong LEP indicates that the study area encompasses the following listings:

- Former Huntley Colliery, Lot 101 DP1247603, Avondale Road, Avondale NSW 2530 (Archaeological item, no. 7102). This item is located within the study area and is locally significant.

- Illawarra Escarpment Landscape Area. Heritage Conservation Area identified under Schedule 5 of the LEP that traverses the western portion of the study area. The conservation area has been identified as being locally significant.

The Former Huntley Colliery (Archaeological item no, 7102) is considered to be significant as:

"...it shows evidence of the key historical theme of mining from 1946 to 1989 in the evolution of land use and character in the Illawarra region. The Huntley Colliery is also significant for its association with the supply of coal to the local domestic market in early days and later to the Tallawarra Power Station for the supply of power to NSW from 1955-1989 and the Electricity Commission of NSW. A major investigation into the high incidence of lymphoma cancer at this site led to a major investigation and the establishment of a register to assist in tracking the incidence of all cancers among Southern District coal miners." (State Heritage Inventory 2023)

A search of the NSW State Archives, NSW State Library, Wollongong local studies collection and NSW Heritage Division Library indicates that the heritage fabric and potential archaeological resource associated with the Huntley Colliery has not been comprehensively assessed. There are numerous records relating to the operation of the colliery that would benefit from review.

The Illawarra Escarpment Landscape Area is considered to be significant as:

"An 'Inspirational cultural landscape' of supreme importance. Values encompass scenic, ecological, historic and indigenous cultural, social (including tourist and recreational), visual, and natural history.

The combined effect of a narrow coastal plain, rugged uplift sheer walls, rich forest and pasture lands give a most dramatic landscape of considerable grandeur which exceeds any other coastal plain and mountain landscape on the NSW coast.

There are many vantage points to experience the extensive views and vistas into and out from. Many smaller areas within the escarpment are of specific scientific, historic and scenic importance. The escarpment is located adjacent to one of the most heavily industrialised and confined areas on Australia's eastern coast (NT 1974). It is the single most important landscape feature of the Illawarra and is integral part of the wider landscape including above the escarpment and the coastal plain." (Department of Planning and Environment 2023)

A search of the NHL indicates that the study area contains the following listing:

- Sydney Cultural Crescent Rock Art

The Sydney Cultural Crescent Rock Art is an area currently under assessment, listed on the Australian Heritage Councils Finalised Priority Assessment List for the NHL for 2022-21. It is described as:

"Sydney Cultural Rock Art site is one of the best and most comprehensive representation of rock art in Australia." (Australian Heritage Council 2021)

It is included for priority assessment:

"Based on the information considered by the Australian Heritage Council, the place may meet one or more of the National Heritage criteria. This place may have outstanding heritage value to the nation due the place's significant density of rock art over area of approximately 2 million hectares of eastern NSW. Rock art is described by Indigenous elders as their history books, with the largest sites being

libraries and provides a tangible record of the Aboriginal peoples' traditions, presence, cultural practices and knowledge systems.” (Australian Heritage Council 2021)

The assessment completion date is 30 June 2025.

Searches of the SHR, CHL, and RNE indicate that the study area is not listed on any of these databases. Figure 5 identifies the location of heritage items in relation to the study area.

Further investigations

Further assessment as part of the EIA is warranted based upon the known heritage values within the study area. As such, the following assessments would be required:

- ACHA to support the EIA. The ACHA must be prepared in accordance with *the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011). This includes an Archaeological Report prepared in accordance with the *Code of practice for archaeological investigation of Aboriginal objects in NSW* (DECCW 2010a) and consultation with Aboriginal community in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010b).
- Historical Heritage Assessment and Statement of Heritage Impact (SoHI) to support the EIA. The SoHI must be prepared in accordance with the NSW Heritage Manual and associated guidelines (Heritage Office & DUAP 1996). This assessment must investigate and assess the potential impacts from the development upon heritage values within the study area, in particular those associated with the Former Huntley Colliery and Illawarra Escarpment Landscape Area.

Please contact me if you have any enquiries.

Yours sincerely



Madeleine Lucas
Heritage Consultant

References

AMBS 2010. *Preliminary Aboriginal and Historic Heritage Assessment: West Dapto Urban Release Area, NSW*, Report for PB+MWH.

Australian Heritage Council 2021. *Finalised Priority Assessment List for the National Heritage List for 2020-21*, chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.dcceew.gov.au/sites/default/files/env/pages/8ac00639-6069-454e-a191-e6b8a3eed9a2/files/fpal-nhl-2020-21.pdf.

Australian Museum Business Services 2006. *Aboriginal heritage management plan: West Dapto Release Area volume 1*, An unpublished report to Wollongong City Council.

Biosis 2007. *Huntley Eco Park, Aboriginal Archaeological Assessment, New South Wales*, Report prepared for TCG Planning. Authors: Burke, S, Cekalovic, H, Biosis Research Pty Ltd, Sydney, NSW. Project no. s4453.

Biosis 2020. *Cleveland Road North Precinct: Aboriginal Cultural Heritage Assessment. Report for Newquest Property*,.

DECCW 2010a. *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*, Department of Environment and Climate Change, Sydney NSW.

DECCW 2010b. *Aboriginal Cultural Heritage Consultation Requirements for Proponents*, New South Wales Government Department of Environment and Climate Change, Sydney NSW.

Department of Planning and Environment 2023. *Illawarra Escarpment State Conservation Area Plan of Management*, <https://www.environment.nsw.gov.au/research-and-publications/publications-search/illawarra-escarpment-state-conservation-area-plan-of-management>.

GML Heritage 2017. *West Dapto 2 Release Area: Aboriginal Cultural Heritage Assessment Report*, Report prepared for Stockland Developments Pty Ltd.

Heritage Office & DUAP 1996. *NSW Heritage Manual*, Department of Urban Affairs and Planning, Sydney.

Niche 2011. *Planning proposal for the Former Huntley Colliery Site and Adjacent Lands, Avondale Road, Avondale NSW. Aboriginal Cultural Heritage Assessment Report*, Prepared for TCG Planning for HTT Huntely Heritage Pty Ltd.

OEH 2011. 'Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW', Office of Environment and Heritage, Department of Premier and Cabinet, Sydney NSW.

State Heritage Inventory 2023. *Huntley Colliery, State Heritage Inventory - Heritage NSW*, <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=5062584>.

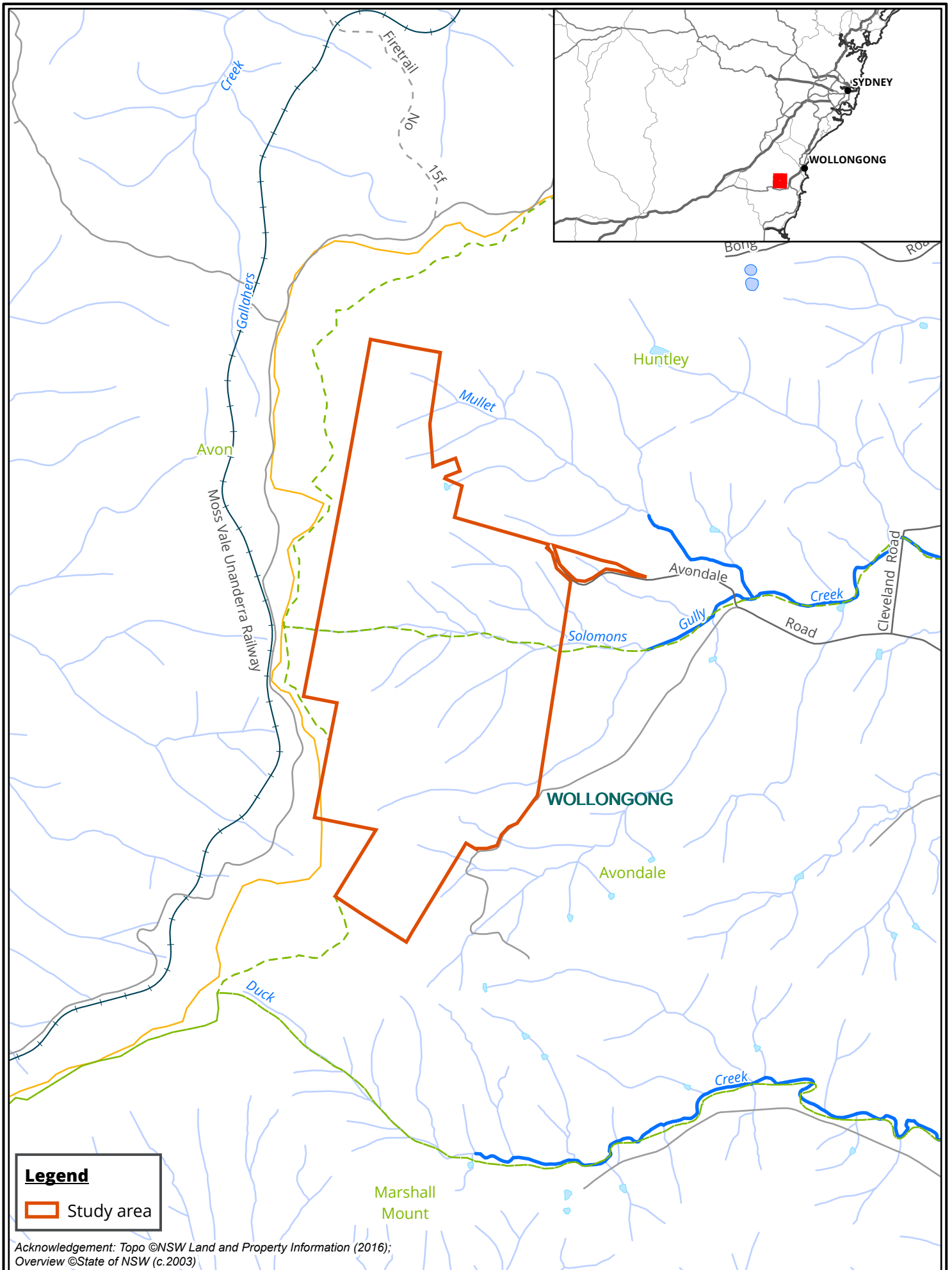
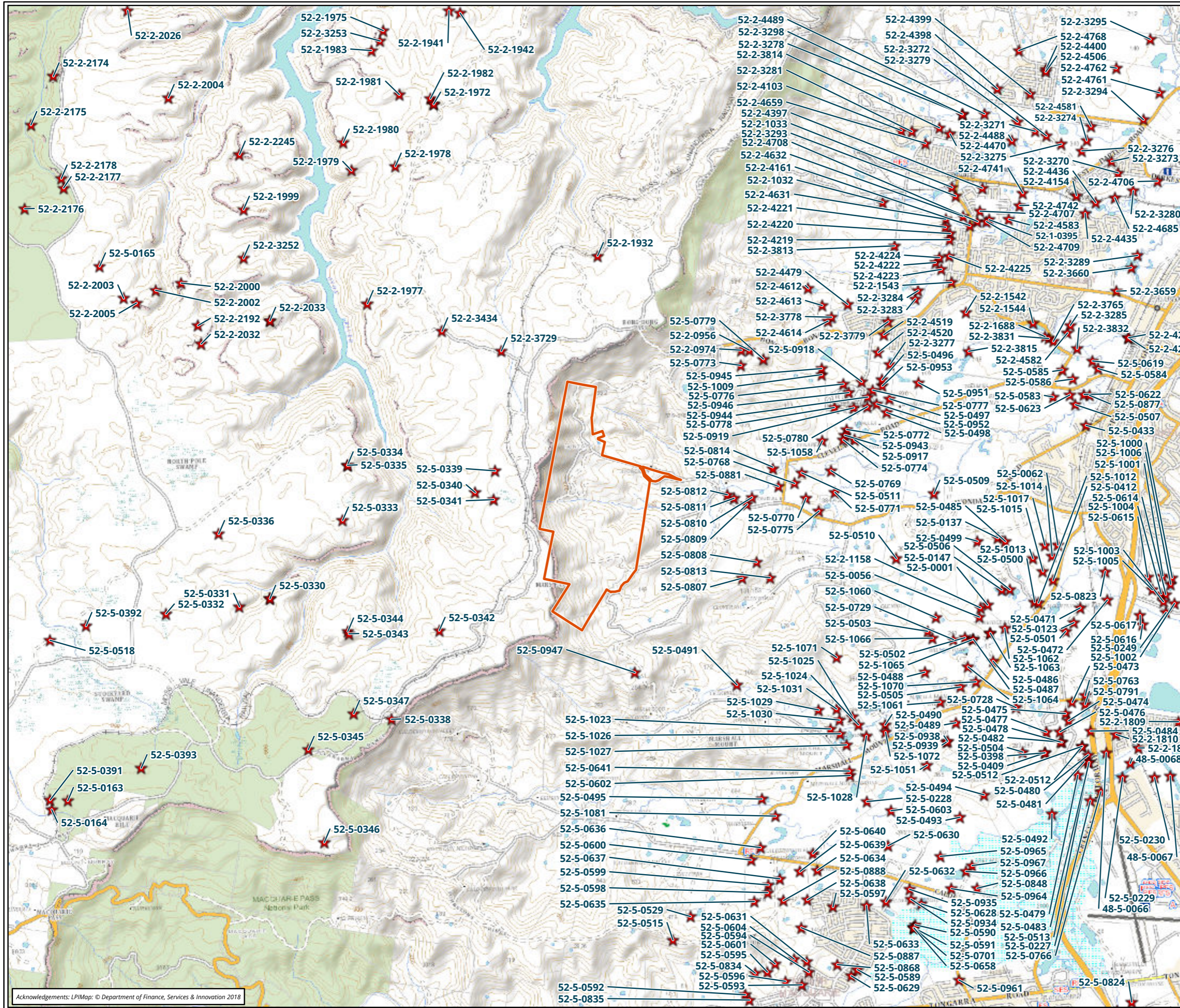
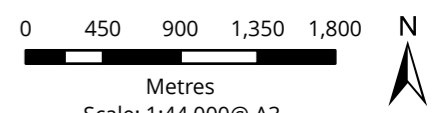


Figure 1 Location of the study area



- Legend**
- Study area
 - ★ AHIMS

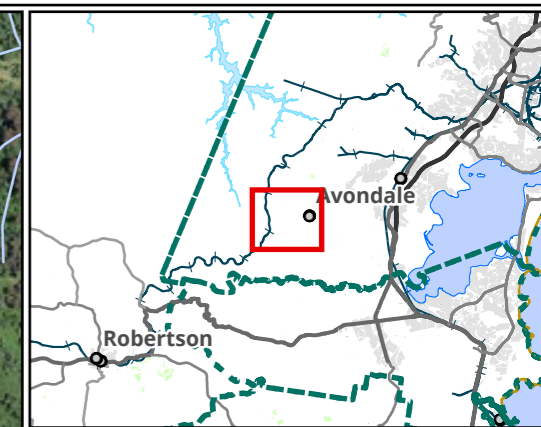
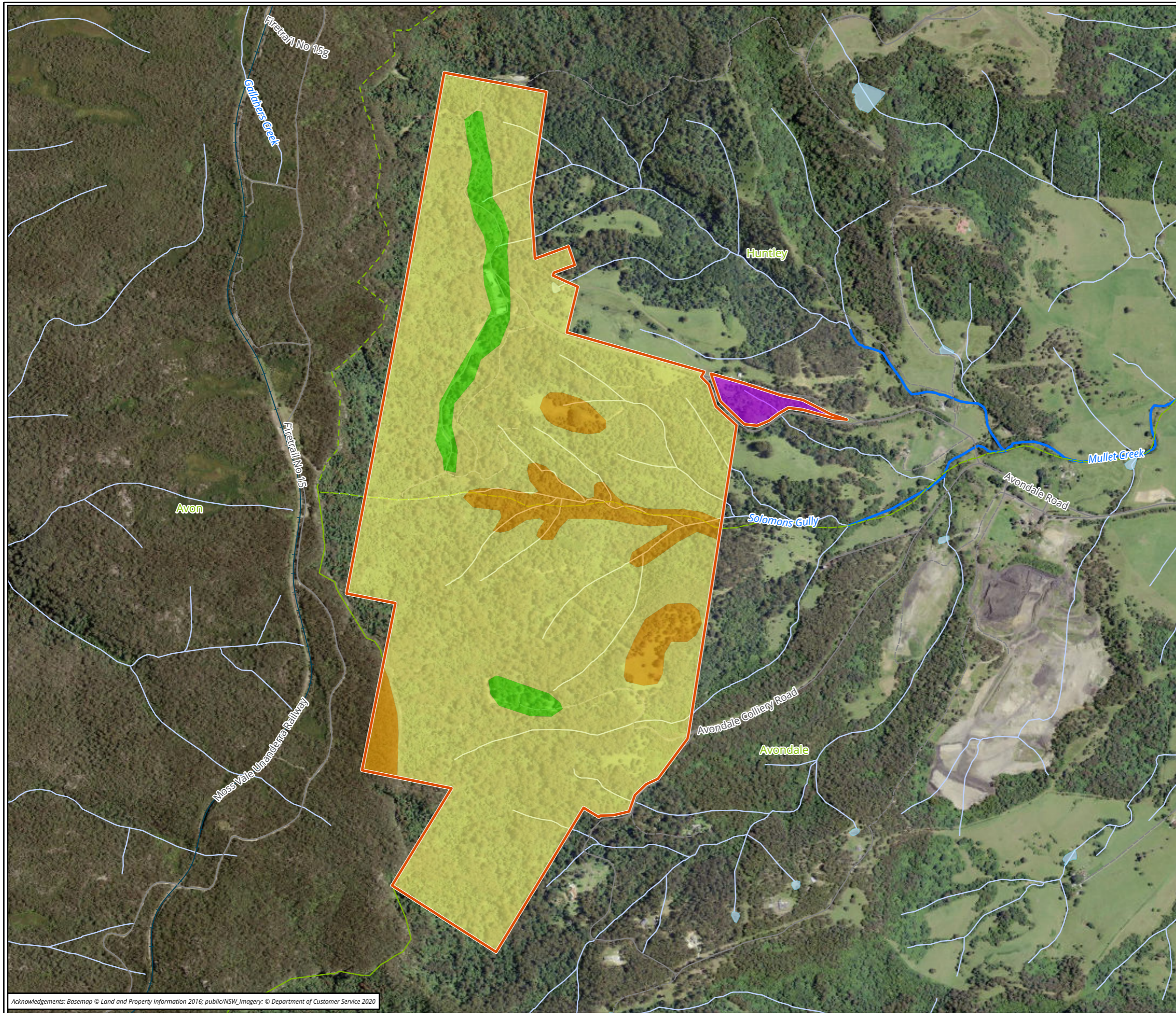
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Figure 3 AHIMS within the vicinity of the study area



Scale: 1:44,000@ A3
 Coordinate System:
 GDA 1994 MGA Zone 56

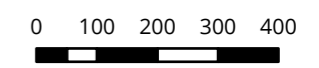


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- Legend**
- Study area
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 - Moderate
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 - No potential
 - Unsurveyed

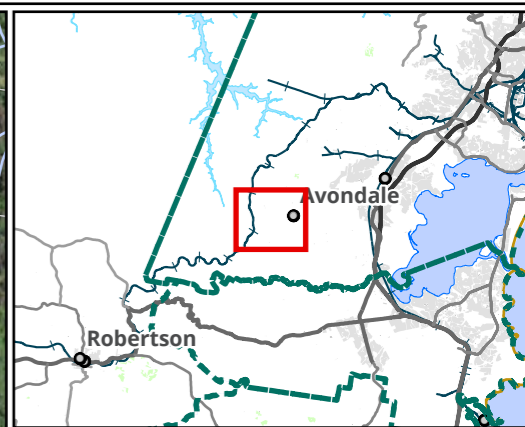
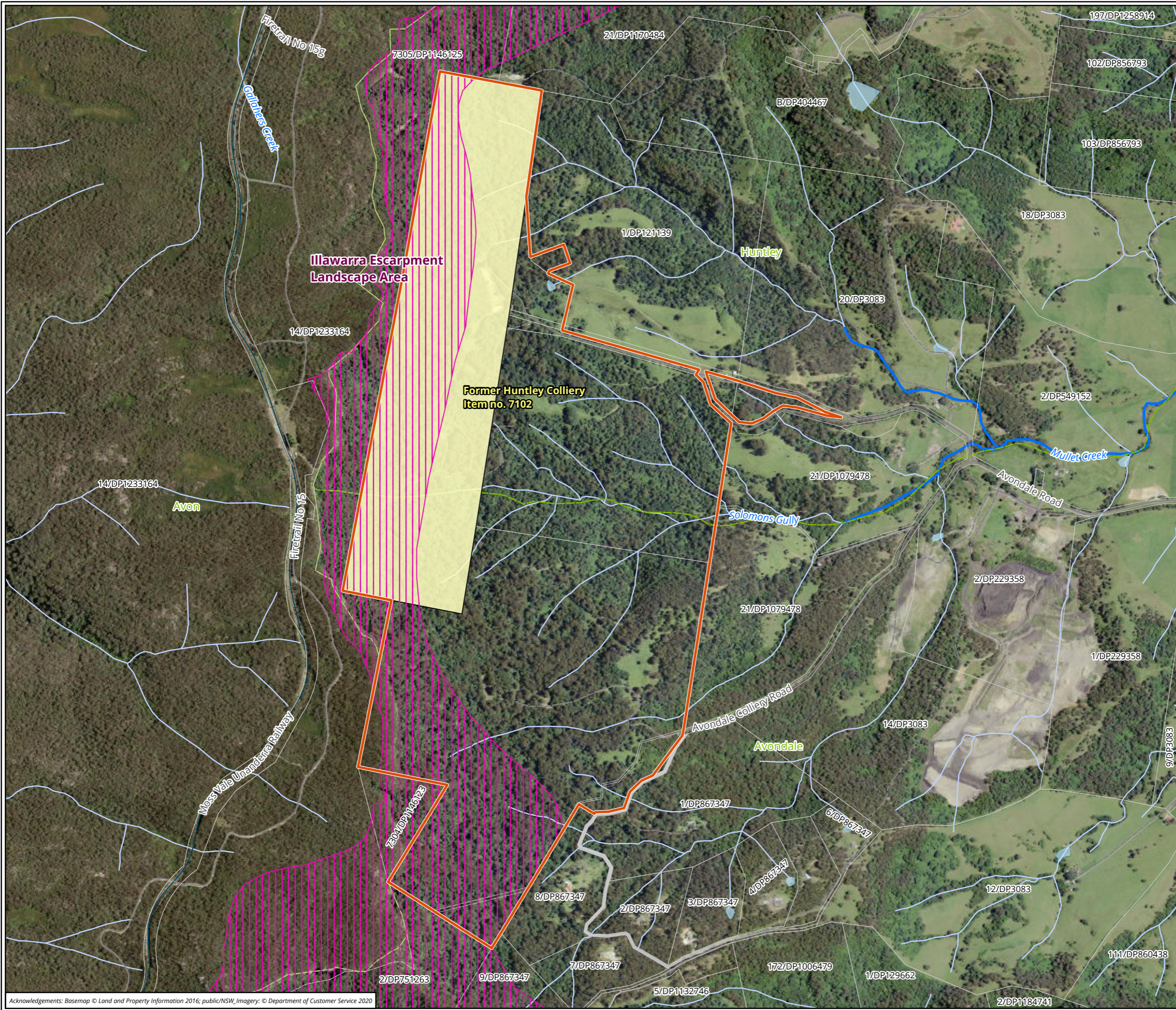
Figure 4 Archaeological potential within the study area



Metres
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 GDA 1994 MGA Zone 56

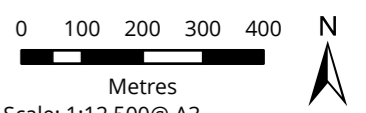


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- Legend**
- Study area
 - Lot
- Local Environmental Plan**
- Landscape Conservation Area - Illawarra Escarpment Landscape Area
 - Archaeological item - Former Huntley Colliery - Item no. 7102

Figure 5 Heritage items in the vicinity of the study area



Scale: 1:12,500@ A3
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