

A stylized topographic map with green contour lines is positioned on the left side of the page, extending from the top to the bottom. The lines represent elevation and are more densely packed in some areas, indicating steeper slopes.

## St Luke's Grammar School, Dee Why - Aboriginal Cultural Heritage Assessment

---

**The Anglican Schools Corporation**

---

## DOCUMENT TRACKING

<b>Project Name</b>	St Luke's Grammar School, Dee Why - Aboriginal Cultural Heritage Assessment
<b>Project Number</b>	19SYD-13213
<b>Project Manager</b>	Rebecca Ben-Haim
<b>Prepared by</b>	Daniel Claggett
<b>Reviewed by</b>	Karyn McLeod
<b>Approved by</b>	David Bonjer
<b>Status</b>	<b>Final</b>
<b>Version Number</b>	<b>3</b>
<b>Last saved on</b>	<b>4 March 2020</b>

This report should be cited as 'Eco Logical Australia 2020. *St Luke's Grammar School, Dee Why - Aboriginal Cultural Heritage Assessment*. Prepared for Midson Group Pty Ltd.'

## ACKNOWLEDGEMENTS

This document has been prepared by Eco Logical Australia Pty Ltd with support from Midson Group Pty Ltd

### Disclaimer

*This document may only be used for the purpose for which it was commissioned and in accordance with the contract between Eco Logical Australia Pty Ltd and Midson Group Pty Ltd. The scope of services was defined in consultation with Midson Group Pty Ltd, by time and budgetary constraints imposed by the client, and the availability of reports and other data on the subject area. Changes to available information, legislation and schedules are made on an ongoing basis and readers should obtain up to date information. Eco Logical Australia Pty Ltd accepts no liability or responsibility whatsoever for or in respect of any use of or reliance upon this report and its supporting material by any third party. Information provided is not intended to be a substitute for site specific assessment or legal advice in relation to any matter. Unauthorised use of this report in any form is prohibited.*

Template 2.8.1

# Contents

<b>1. Introduction .....</b>	<b>1</b>
1.1 Background.....	1
1.2 Location of the proposed works .....	1
1.3 Purpose and aims .....	1
1.4 Authorship .....	2
1.5 Statutory Control and Development Context .....	6
1.5.1 National Parks and Wildlife Act 1974 (NSW) .....	6
1.5.2 Heritage Act 1977 (NSW) .....	7
1.5.3 Environmental Planning and Assessment Act 1979 (NSW).....	8
<b>2. Basis for Cultural Heritage Management .....</b>	<b>9</b>
<b>3. Description of the Area .....</b>	<b>10</b>
3.1 Soil types, geology and landforms .....	10
3.2 Landform Elements.....	11
3.3 Ethnohistoric Context .....	15
3.3.1 Regional History.....	15
3.3.2 Local History .....	15
<b>4. Consultation.....</b>	<b>18</b>
4.1 Stage 1 – Notification of project proposal and registration of interest .....	18
4.1.1 Placement of advertisement in local newspaper.....	18
4.1.2 Written request for information about Aboriginal organisations .....	18
4.1.3 Letters to Aboriginal organisations.....	18
4.2 Stage 2 and Stage 3 - Presentation of information about the proposed project and gathering information about cultural significance .....	19
4.2.1 Project information and methodology .....	19
4.2.2 Archaeological Survey .....	19
4.3 Stage 4 – Review of draft cultural heritage report.....	19
<b>5. Summary and Analysis of Background Information.....</b>	<b>20</b>
5.1 AHIMS sites.....	20
5.1.1 Previous archaeological studies – Regional .....	22
5.1.2 Previous archaeological studies - Local.....	22
5.2 Summary.....	25
5.3 Field Survey.....	25
5.3.1 Summary of field survey .....	25
<b>6. Cultural Heritage Values and Statement of Significance .....</b>	<b>28</b>

6.1 Description of cultural heritage values .....	28
Social or cultural value .....	28
Historic value .....	28
Scientific (archaeological) value .....	28
Aesthetic value .....	28
Spiritual value .....	29
6.2 Aboriginal Cultural Values Assessment .....	29
6.2.1 Social significance .....	29
6.2.2 Aesthetic significance .....	29
6.2.3 Historic significance .....	29
6.2.4 Scientific significance .....	29
Research Potential: .....	29
Representativeness: .....	29
Rarity: .....	29
Educational Potential: .....	30
6.2.5 Spiritual significance .....	30
6.3 Statement of significance .....	30
<b>7. Development Proposal Activity .....</b>	<b>31</b>
7.1 Overview .....	31
7.2 Consideration of Ecologically Sustainable Development .....	31
7.2.1 Principles of ESD .....	31
7.3 Cumulative Impact Assessment .....	32
7.3.1 Effect on the proportion of this Type of Aboriginal Site in the Area .....	32
<b>8. Avoiding and or Mitigating Harm .....</b>	<b>33</b>
<b>9. Management Recommendations .....</b>	<b>34</b>
<b>10. References .....</b>	<b>35</b>
<b>Appendix A Consultation Log .....</b>	<b>37</b>
<b>Consultation Stage 1 Detail .....</b>	<b>42</b>
Responses from organisations contacted in section 4.1.2 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents' (DECCW 2010) .....	45
Advertisement published in the Manly Daily on 10 July 2019 .....	50
Letters sent to Aboriginal people listed as having an interest in the Northern Beaches LGA as identified through section 4.1.2 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents' (DECCW 2010) and responses .....	51
RAP responses to the Aboriginal stakeholder consultation invitation .....	54
<b>Consultation Stage 2 and 3 Detail .....</b>	<b>57</b>
Responses to project background and methodology sent to RAPs .....	57
RAP comments on draft ACHA .....	58

<b>Appendix B AHIMS Search Results .....</b>	<b>59</b>
--	-----------

## List of Figures

Figure 1: The study area .....	3
Figure 2: Ground floor plan of the proposed school expansion (Source: Tonkin Zulaikha Greer Architects) .....	4
Figure 3: Section mapping of the proposed school expansion (Source: Tonkin Zulaikha Greer Architects) .....	5
Figure 4: Reproduced from the <i>Australian Soil and Land Survey Field Handbook</i> (CSIRO 2009). Examples of profiles across terrain divided into morphological types of landform element. Note that the boundary between crest and slope elements is at the end of the curvature of the crest. Each slope element is treated as if it were straight. ....	12
Figure 5: Reproduction from the <i>Australian Soil and Land Survey Field Handbook</i> (CSIRO 2009). A landform pattern of rolling low hills mapped into morphological types of landform element. Note that the crests and depressions in this case are mainly narrower than the recommended site size. ....	13
Figure 6: Landforms within the study area .....	14
Figure 7: The site of St Luke's Grammar School in 1943. No development has taken place at this time	16
Figure 8: Soil landscapes and hydrology .....	17
Figure 9: AHIMS sites within 3.5 km of the study area .....	21
Figure 10: Carparking facilities occupying a large portion of 224 Headland Road, facing south.....	26
Figure 11: Warehouses located in 224 Headland Road, facing southeast.....	26
Figure 12: Driveway that leads to Headland Road, facing southeast .....	26
Figure 13: Remnant vegetation located along the driveway at 224 Headland Road, facing southeast..	26
Figure 14: Carparking located along the frontage of the Wormald Building, 800 Pittwater Road.....	26
Figure 15: The entrance to the Wormald Building, facing east .....	26
Figure 16: A portion of the Stony Range Flora Reserve adjacent the eastern border of 800 Pittwater Road, facing southeast .....	27

## List of Tables

Table 1: Geology and landforms of the study area .....	10
Table 2: Registered Aboriginal Parties .....	19
Table 3: RAP responses to the draft methodology .....	19
Table 4: Frequencies of site types and contexts .....	20
Table 5: Heritage studies conducted within the Northern Beaches area .....	23
Table 6: Survey coverage .....	27
Table 7: Landform summary - sampled area .....	27
Table 8: Frequencies of site types and contexts .....	32

## Abbreviations

Abbreviation	Description
ACHA	Aboriginal Cultural Heritage Assessment
AHIP	Aboriginal Heritage Impact Permit
AHIMS	Aboriginal Heritage Information Management System
ARD	Archaeological Research Design
ATR	Archaeological Technical Report
DCP	Development Control Plan
DECCW	(Former) Department of Environment Climate Change and Water
DPIE	NSW Department of Planning, Industry and Environment
ELA	Eco Logical Australia Pty Ltd
LEP	Local Environmental Plan
OEH	(Former) NSW Office of Environment and Heritage
PAD	Potential Archaeological Deposit
SHI	State Heritage Inventory
SHR	State Heritage Register

## Executive Summary

Eco Logical Australia (ELA) was commissioned by Midson Group Pty Ltd, on behalf of the Anglican School's Corporation to prepare an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development planning approval for the proposed redevelopment of existing buildings and expansion / construction of new campus buildings for St Luke's Grammar School, located in Dee Why, NSW.

The proposed development consists of the construction of a new senior school campus and sports centre for St Luke's Grammar School. These works have been proposed to existing campus buildings along 800 Pittwater Road and 224 Headland Road. No works are proposed to the existing school campus at 210 Headland Road, however it will be included as part of the Development Application (DA).

Aboriginal community consultation was undertaken for the project following the *Aboriginal cultural heritage consultation requirements for proponents 2010*. The consultation registration process resulted in the registration of six (6) different Registered Aboriginal Parties (RAPs) for the project.

An archaeological survey of the study area was undertaken on 15 August 2019 by ELA Archaeologist Daniel Claggett and Selina Timothy, Heritage Site Officer with the Metropolitan Local Aboriginal Land Council. Site survey identified both properties as having been heavily disturbed through sandstone cutting, the construction of an underground carpark within 800 Pittwater Road and the construction of surface carparking and buildings across both properties.

The ACHA has identified that zero Aboriginal heritage sites will be harmed by the proposed development. There is nil archaeological potential across the entirety of the study area and no archaeological mitigation measures are required.

This report satisfies the SEARs requirement for an ACHA report to be prepared.

### **Recommendation 1 – No further assessment required, works may proceed with caution**

No further archaeological assessment is warranted for the study area, although general measures will need to be undertaken. These general measures include:

- Aboriginal objects are protected under the NPW Act regardless if they are registered on AHIMS or not. If suspected Aboriginal objects, such as stone artefacts are located during future works, works must cease in the affected area and an archaeologist called in to assess the finds.
- If the finds are found to be Aboriginal objects, the DPIE must be notified under section 89A of the NPW Act. Appropriate management and avoidance or approval under a section 90 AHIP should then be sought if Aboriginal objects are to be moved or harmed.
- In the extremely unlikely event that human remains are found, works should immediately cease and the NSW Police should be contacted. If the remains are suspected to be Aboriginal, the DPIE may also be contacted at this time to assist in determining appropriate management.

## **Recommendation 2 – Submit ACHA/ATR to AHIMS**

- In accordance with Chapter 3 of the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011) the ACHA should be submitted for registration on the AHIMS register and sent to all Registered Aboriginal Parties within three months of completion.



# 1. Introduction

## 1.1 Background

Eco Logical Australia (ELA) was commissioned by Midson Group Pty Ltd, on behalf of the Anglican School's Corporation to prepare an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development (SSD) planning approval for the proposed redevelopment of existing buildings and expansion / construction of new campus buildings for St Luke's Grammar School, located in Dee Why, NSW (Figure 1).

The proposed development consists of the construction of a new senior school campus and sports centre for St Luke's Grammar School. These works have been proposed to existing campus buildings along 800 Pittwater Road and 224 Headland Road. No works are proposed to the existing school campus at 210 Headland Road, however it will be included as part of the SSD.

Plans of the proposed works have been provided by the Proponent (Figure 2, Figure 3).

## 1.2 Location of the proposed works

The existing campus for St Luke's Grammar School is located at 210 Headland Road (Lot 2112 DP752038 and Lot 100 DP1251179). The proposed works will expand the school campus partially into 224 Headland Road (SP45082 and SP18941) and will encompass the entirety of 800 Pittwater Road (Lot 6 and 7 DP523299). The total area of the existing and proposed school campus is approximately 3 ha. The school campus is located in Dee Why, within the Northern Beaches Local Government Area (LGA), Parish of Manly Cove, County of Cumberland.

## 1.3 Purpose and aims

According to the Department of Planning, Industry and Environment (DPIE) the investigation and assessment of Aboriginal cultural heritage is undertaken to explore the harm of a proposed activity on Aboriginal objects and declared Aboriginal places and to clearly set out which impacts are avoidable, and which are not.

Harm to significant Aboriginal objects and declared Aboriginal places should always be avoided wherever possible. Where such harm cannot be avoided, proposals that reduce the extent and severity of this harm should be developed. An ACHA is also required to consult with Aboriginal people who hold cultural knowledge that will help to determine the cultural significance of Aboriginal objects and/or places in a proposed project area.

This ACHA has been carried out in accordance with the guidelines outlined in *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011). This ACHA presents the results of the assessment and recommendations for actions to be taken before, during and after an activity to manage and protect Aboriginal objects and declared Aboriginal places identified by the investigation and assessment.

## 1.4 Authorship

This ACHA has been prepared by Daniel Claggett, ELA Archaeologist, with review by Karyn McLeod, ELA Principal Heritage Consultant.

Daniel Claggett has an MA (Maritime Archaeology) from Flinders University of South Australia. Karyn McLeod has a Bachelor of Arts (Honours) in Archaeology from the University of Sydney and an MA in Cultural Heritage from Deakin University.

All site photographs were taken by the Author unless otherwise referenced.

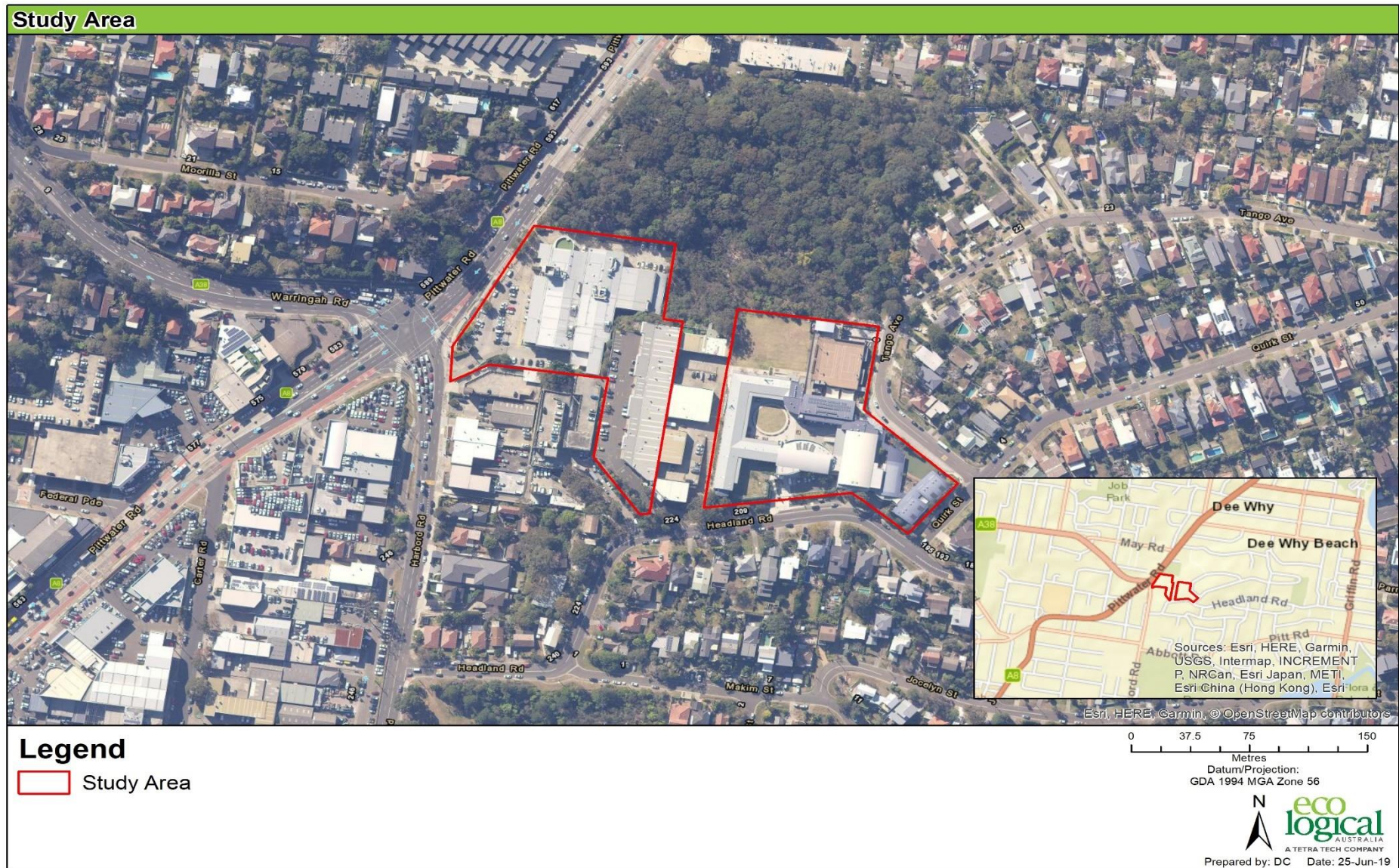


Figure 1: The study area



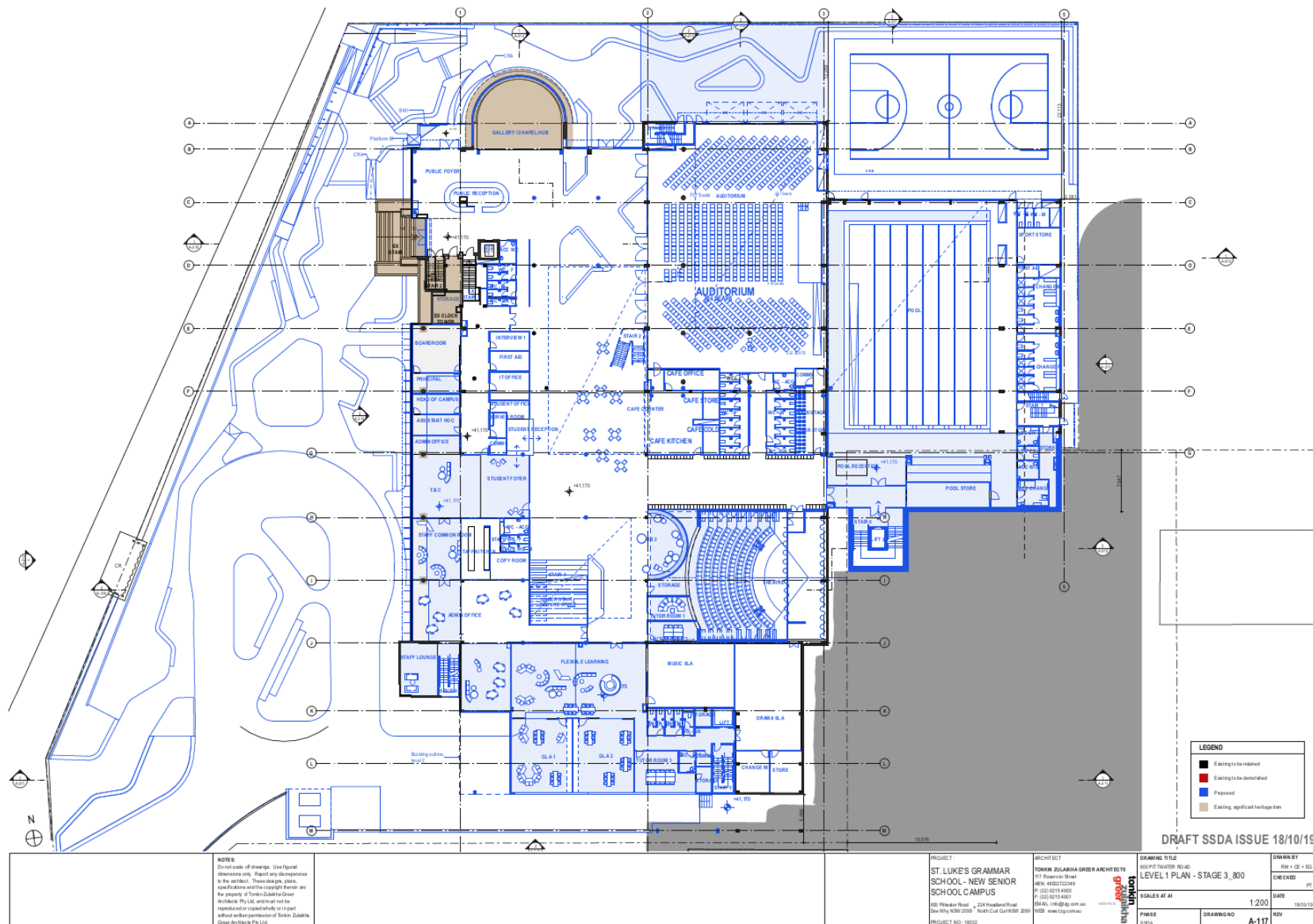


Figure 2: Ground floor plan of the proposed school expansion (Source: Tonkin Zulaikha Greer Architects)

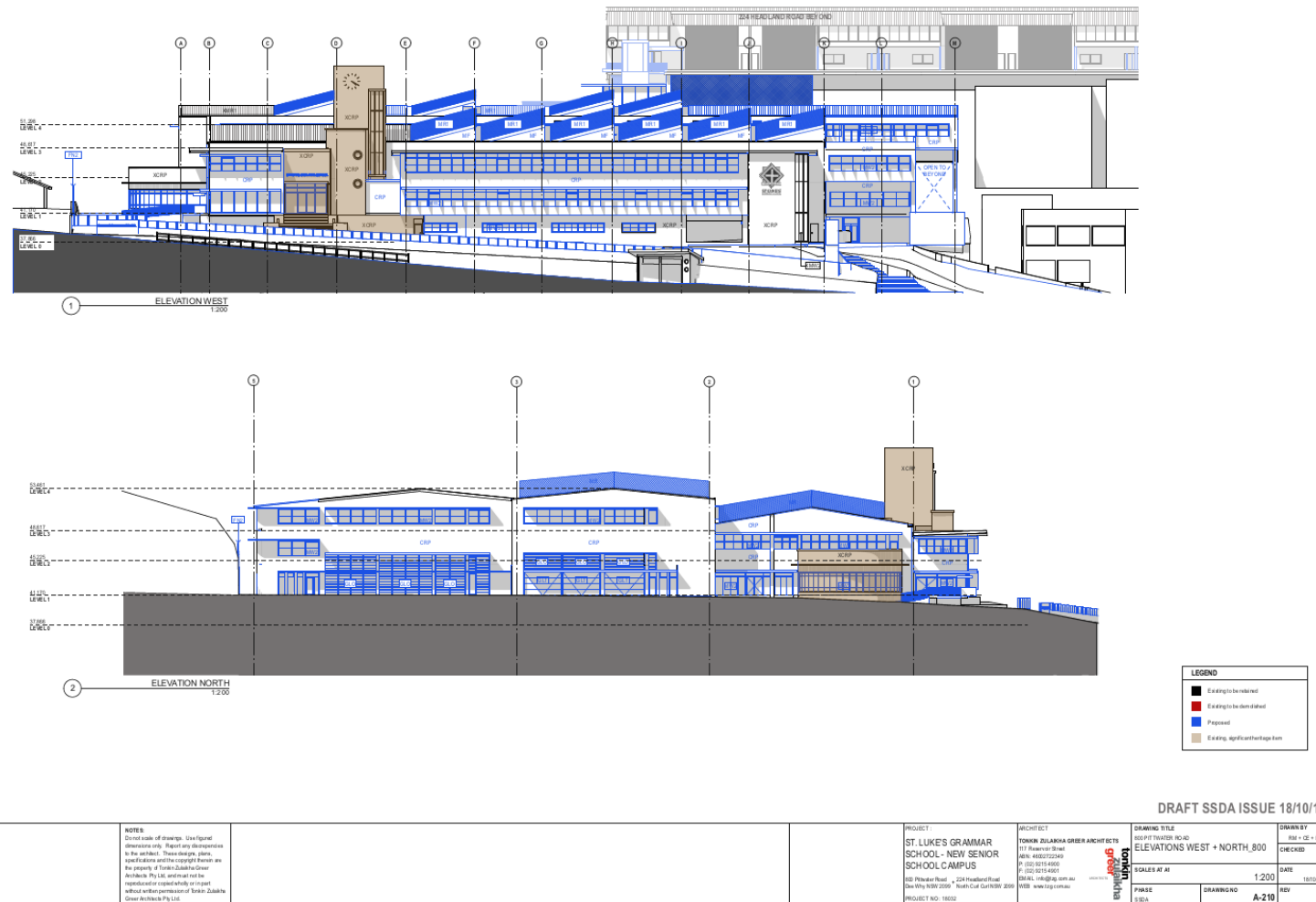


Figure 3: Section mapping of the proposed school expansion (Source: Tonkin Zulaikha Greer Architects)

## 1.5 Statutory Control and Development Context

### 1.5.1 National Parks and Wildlife Act 1974 (NSW)

Aboriginal cultural heritage in NSW is afforded protection under the provisions of the *National Parks and Wildlife Act 1974* (NSW) [NPW Act]. The NPW Act is administered by the DPIE (formerly the Office of Environment and Heritage) which has responsibilities under the legislation for the proper care, preservation and protection of 'Aboriginal objects' and 'Aboriginal places'.

Under the provisions of the NPW Act, all Aboriginal objects are protected irrespective of their level of significance or issues of land tenure. Aboriginal objects are defined by the NPW Act as any deposit, object or material evidence (that is not a handicraft made for sale) relating to Aboriginal habitation of NSW, before or during the occupation of that area by persons of non-Aboriginal extraction (and includes Aboriginal remains). Aboriginal objects are limited to physical evidence and may be referred to as 'Aboriginal sites', 'relics' or 'cultural material'. Aboriginal objects can include scarred trees, artefact scatters, middens, rock art and engravings, as well as post-contact sites and activities such as fringe camps and stockyards. The DPIE must be notified on the discovery of Aboriginal objects under section 89A of the NPW Act.

Part 6 of the NPW Act provides specific protection for Aboriginal objects and places by making it an offence to destroy, deface, damage, or move them from the land. The *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010c) as adopted by the National Parks and Wildlife Regulation 2009 (NPW Regulation) made under the NPW Act, provides guidance to individuals and organisations to exercise due diligence when carrying out activities that may harm Aboriginal objects. This Code also determines whether proponents should apply for consent in the form of an AHIP under section 90 of the Act. This code of practice can be used for all activities across all environments. The NPW Act provides that a person who exercises due diligence in determining that their actions will not harm Aboriginal objects has a defence against prosecution for the strict liability offence if they later unknowingly harm an object without an Aboriginal Heritage Impact Permit (AHIP). However, if an Aboriginal object is encountered in the course of an activity work must cease and an application should be made for an AHIP.

The *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a) assists in establishing the requirements for undertaking test excavation as a part of archaeological investigation without an AHIP or establishing the requirements that must be followed when carrying out archaeological investigation in NSW where an application for an AHIP is likely to be made.

The DPIE recommends that the requirements of this Code also be followed where a proponent may be uncertain about whether or not their proposed activity may have the potential to harm Aboriginal objects or declared Aboriginal places.

#### *AHIMS database*

The Aboriginal Heritage Information Management System (AHIMS) is a statutory register managed by the DPIE under section 90Q of the NPW Act. The AHIMS manages information on known Aboriginal sites, including objects as defined under the NPW Act.

### 1.5.2 Heritage Act 1977 (NSW)

The *Heritage Act 1977* (NSW) is a statutory tool designed to conserve the environmental heritage of NSW and is used to regulate development impacts on the state's heritage places, buildings, works, relics, moveable objects or precincts that are important to the people of NSW. These include items of Aboriginal and non-Aboriginal heritage significance. Where these items have particular importance to the state of NSW, they are listed on the State Heritage Register (SHR).

Identified heritage items may be protected by means of either Interim Heritage Orders (IHO) or by listing on the SHR. Proposals to alter, damage, move or destroy places, buildings, works, relics; moveable objects or precincts protected by an IHO or listed on the SHR require an approval under Section 60 of the Act.

Archaeological features and deposits are afforded statutory protection by the 'relics provision' section 139 of the Act (as amended in 1999). Under this section it is illegal to disturb or excavate any land knowing or suspecting that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed. In such cases, an excavation permit under section 140 is required. Note that no formal listing is required for archaeological relics; they are automatically protected if they are of local or state significance.

#### *Heritage registers*

The State Heritage Inventory is a database of heritage items in New South Wales which includes:

- declared Aboriginal Places;
- items listed on the State Heritage Register (SHR)
- listed Interim Heritage Orders (IHO)
- items on State Government Agency Heritage Registers (S170), and,
- items listed of local heritage significance on a local council's Local Environmental Plan (LEP).

The SHR is the statutory register under Part 3A of the *Heritage Act 1977* (NSW). If a particular site does not appear on either the SHR or SHI this does not mean that the site does not have heritage significance as many sites within NSW have not been assessed to determine their heritage significance. Sites that appear on either the SHR or SHI have a defined level of statutory protection.

Key Aboriginal sites, including post contact sites, can be protected by inclusion on the SHR. The Heritage Council nominates sites for consideration by the Minister for Environment and Heritage.

Searches of the Australian Heritage Database, the State Heritage Register (SHR) and Warringah Local Environmental Plan (LEP) 2011 utilising the term "Dee Why, NSW" was conducted on 03 July 2019 in order to determine if any places of archaeological significance are located within the study area.

The search identified that one of the subject lots (Lot 6 DP 523299) is listed as a heritage item on the Warringah LEP 2011 as the Former Wormald Building (front entrance/canteen). Additionally, three lots adjacent the subject area (Lot 7 DP 523299, Lot 368 & 369, DP 752038) and a portion of one of the subject lots (Lot 2112 DP 752038) are located within the curtilage of the Stony Range Flora Reserve, another locally-listed heritage item. The proposed works will not be impacting within the flora area.

The ACHA focusses solely on the Aboriginal heritage potential and cultural values of the study area. It is outside of the scope of this report to address the historical heritage items located within the study area.

### 1.5.3 Environmental Planning and Assessment Act 1979 (NSW)

The *Environmental Planning and Assessment Act 1979* (NSW) [EP&A Act] requires that consideration is given to environmental impacts as part of the land use planning process. In NSW, environmental impacts are interpreted as including cultural heritage impact. Proposed activities and development are considered under different parts of the EP&A Act, including:

- Major projects (State Significant Development under Part 4.1 and State Significant Infrastructure under Part 5.1), requiring the approval of the Minister for Planning.
- Minor or routine developments, requiring local council consent, are usually undertaken under Part 4. In limited circumstances, projects may require the Minister's consent.
- Part 5 activities which do not require development consent. These are often infrastructure projects approved by local councils or the State agency undertaking the project.

This project will be assessed as a Major project (State Significant Development) under Part 4.1 of the EP&A Act.

The EP&A Act also controls the making of environmental planning instruments (EPIs) such as Local Environmental Plans (LEPs) and State Environmental Planning Policies (SEPPs). LEPs commonly identify and have provisions for the protection of local heritage items and heritage conservation areas.

Local Environmental Plans (LEPs) are prepared by local councils to guide planning and management decisions in the Local Government Areas (LGAs) and establish the requirements for the use and development of land. The study area falls within the Northern Beaches Council LGA and under the Warringah LEP 2011. This document contains provisions to conserve and protect cultural heritage resources, with specific reference to Aboriginal cultural heritage and historical heritage.



## 2. Basis for Cultural Heritage Management

*Places of cultural significance enrich people's lives, often providing a deep and inspirational sense of connection to community and landscape, to the past, and to lived experiences ... they are irreplaceable and precious (Australia ICOMOS Burra Charter 2013:1).*

Traditionally, heritage and archaeological assessments have focused on the significance of the tangible elements of cultural heritage (Brown 2008). Items such as structures and archaeological artefacts have been considered predominantly in terms of their scientific/research potential and representativeness (New South Wales Heritage Office 2015:20-24). By focusing on the scientific qualities of heritage, many of the intangible qualities of heritage were not considered. This is especially crucial when participating in the management and protection of Aboriginal cultural heritage. By nature, Aboriginal cultural heritage is multi-faceted: it consists not only of tangible structures and objects of value for scientific investigations, but also of a deeply complex array of intangible expressions, such as stories, memories, and traditions. Many of the rights and interests of Aboriginal communities in their own heritage is formed on the basis of this intangibility. It stems from their spirituality, customary law, original ownership, and continuing custodianship (Australian Heritage Commission 2002:5). These intangible expressions often share a strong link with the landscape. Byrne *et al.* (2003:3) describe this connection in the form of a map, where individuals:

*Carry around in [their] heads a map of the landscape which has all these places and their meanings detailed on it. When we walk through our landscapes the sight of a place will often trigger the memories and the feelings [that] go with them ... it is the landscape talking to us.*

Crucially, those who are not connected to the landscape in question will not be able to discern these intangible meanings embedded in the landscape; they can only come to recognise the significance by consulting with local knowledge holders (Byrne *et al.* 2003:3). And, even so, they may vary between individuals, reflecting unique experiences.

By recognising the rights and interests of Aboriginal knowledge holders and community members in their cultural heritage, all parties involved in the identification, conservation, and management of this cultural heritage must acknowledge that Aboriginal people (Australian Heritage Commission 2002:6):

- Are the primary source of information on the value of their heritage and how this is best conserved;
- Must have an active role in any heritage planning processes;
- Must have input into primary decision-making in relation to their heritage so that they can continue to fulfil their obligations towards this heritage; and
- Must control the intellectual property and other information relating specifically to their heritage, as this may be an integral aspect of its heritage value.

As such, cultural heritage sites and objects are fundamental elements of Aboriginal peoples' identities, connections, and belonging to their communities. The careful protection and management of this heritage is essential for the preservation of connection between past, present, and future.

### 3. Description of the Area

#### 3.1 Soil types, geology and landforms

The project area is located within the Pittwater sub-bioregion on the Hornsby Plateau. In general, the Hornsby Plateau is comprised of low rolling and steep hills, with moderately inclined slopes of 10-15 degrees, and is the dominant landform element of the region. The underlying geology of the project area comprises of Hawkesbury Sandstone (Benson 1992; Tozer 2003) (Table 1).

**Table 1: Geology and landforms of the study area**

Geology		Characteristic landforms	Typical soils	Vegetation
Triassic Sandstone	Hawkesbury with thin ridge capping of Ashfield Shale.	Hornsby plateau of quartz sandstone with occasional shale caps. Small beach, dune and lagoon barrier systems. Steep coastal cliffs and rock platforms.	Deep yellow earths or rocky outcrop on plateau tops. Uniform and texture contrast soils on sandstones and shale slopes. Loamy sands in alluvium along creeks, clean quartz sands with moderate shell content on beaches and frontal dunes. Organic sands and muds in estuaries.	Shale caps support tall forest of Sydney blue gum and blackbutt or turpentine and grey ironbark. Sandstone plateau; Sydney peppermint, smooth-barked apple, scribbly gum, red bloodwood, yellow bloodwood, with diverse shrubs and patches of heath. Blackbutt, turpentine, coachwood and water gum in deep sheltered gullies. Spotted gum, Deane's gum, bangalow palm, and forest oak on Narrabeen sandstone lower slopes. Banksia, tea-tree heath on dunes. Bangalay, swamp mahogany, cabbage tree palm, swamp oak, common reed and cumbungi in fresh swamps. Mangrove and saltmarsh communities in quiet estuary
	Narrabeen sandstones exposed in valleys and along the coast.			
	Quaternary coastal sands.			

The study area is surrounded by several soil landscapes; however, it is situated entirely within the Gynea soil landscape. The Gynea soil landscape is underlain by Hawkesbury Sandstone, a medium to coarse-grained quartz sandstone with minor shale and laminite lenses. Typically, the top soil consists of a loose, coarse sandy loam with an apedal single grained structure and porous sandy fabric. The pH varies from strongly acidic to moderately acidic. Subsurface soils consist of earthy, yellowish brown clay/sand. The pH of subsurface soils varies from strongly to slightly acidic in composition. Peds which appear in this layer are weakly developed, porous and either smooth or rough faced. Soil layers closer to the bedrock become more pedal and made up of ironstone fragments, but charcoal fragments are absent, and roots are rare (Bannerman SM and Hazelton PA, 1990).

There are no drainage lines within 500 m of the study area. The closest creek line is a first-order section of Greendale Creek, located 640 m to the southwest. The proposed works are located approximately 800 m southeast of Curl Curl Lagoon and 1.6 km from the shoreline (Figure 8).

### 3.2 Landform Elements

Landform elements fall into morphological types as sketched in Figure 4 and Figure 5. The ten types defined in the Australian Soil and Land Survey Field Handbook (CSIRO 2009) are:

- Crest (C);
- Hillock (H);
- Ridge (Ridge);
- Simple slope (S);
- Upper slope (U);
- Mid-slope (M);
- Lower slope (L);
- Flat (F);
- Open depression (vale) (V); and
- Closed depression (D).

Crests and depressions form the highest and lowest parts of the terrain. They are defined (CSIRO 2009) as follows:

**Crest:** Landform element that stands above all, or almost all, points in the adjacent terrain. It is characteristically smoothly convex upwards in downslope profile or in contour, or both. The margin of a crest element should be drawn at the limit of observed curvature.

**Depression:** Landform element that stands below all, or almost all, points in the adjacent terrain. A closed depression stands below all such points; an open depression extends at the same elevation, or lower, beyond the locality where it is observed. Many depressions are concave upwards and their margins should be drawn at the limit of observed curvature.

Landform elements that are slopes are treated as if each element is straight, and meets another slope element at a slope break. Four morphological types are distinguished on their position in a toposequence relative to crests, flats (defined below) and depressions:

**Simple slope:** Slope element adjacent below a crest or flat and adjacent above a flat or depression.

**Upper slope:** Slope element adjacent below a crest or flat but not adjacent above a flat or depression.

**Mid-slope:** Slope element not adjacent below a crest or flat and not adjacent above a flat or depression.

**Lower slope:** Slope element not adjacent below a crest or flat but adjacent above a flat or depression.

Flats are defined (CSIRO 2009) as follows:

**Flat:** planar landform element that is neither a crest nor a depression and is level or very gently inclined (<3% tangent approximately).

Several types of landform feature have crests and adjoining slopes that are so small that a 20 m radius site would usually include both. Two compound morphological types are distinguished by the relative length of the crest:

**Hillock:** Compound landform element comprising a narrow crest and short adjoining slopes, the crest length being less than the width of the landform element.

**Ridge:** compound landform element comprising a narrow crest and short adjoining slopes, the crest length being greater than the width of the landform element.

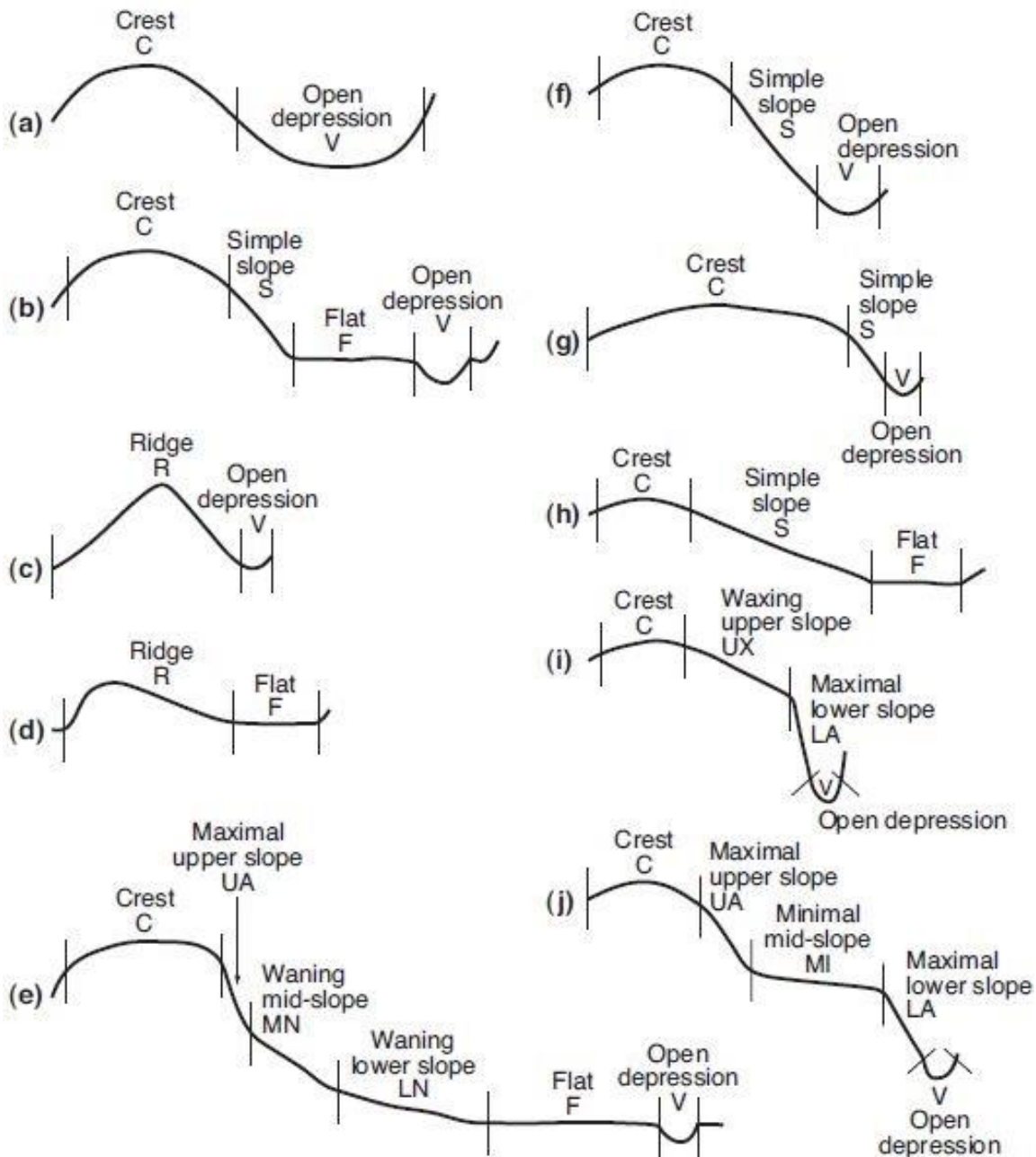


Figure 4: Reproduced from the *Australian Soil and Land Survey Field Handbook* (CSIRO 2009). Examples of profiles across terrain divided into morphological types of landform element. Note that the boundary between crest and slope elements is at the end of the curvature of the crest. Each slope element is treated as if it were straight.

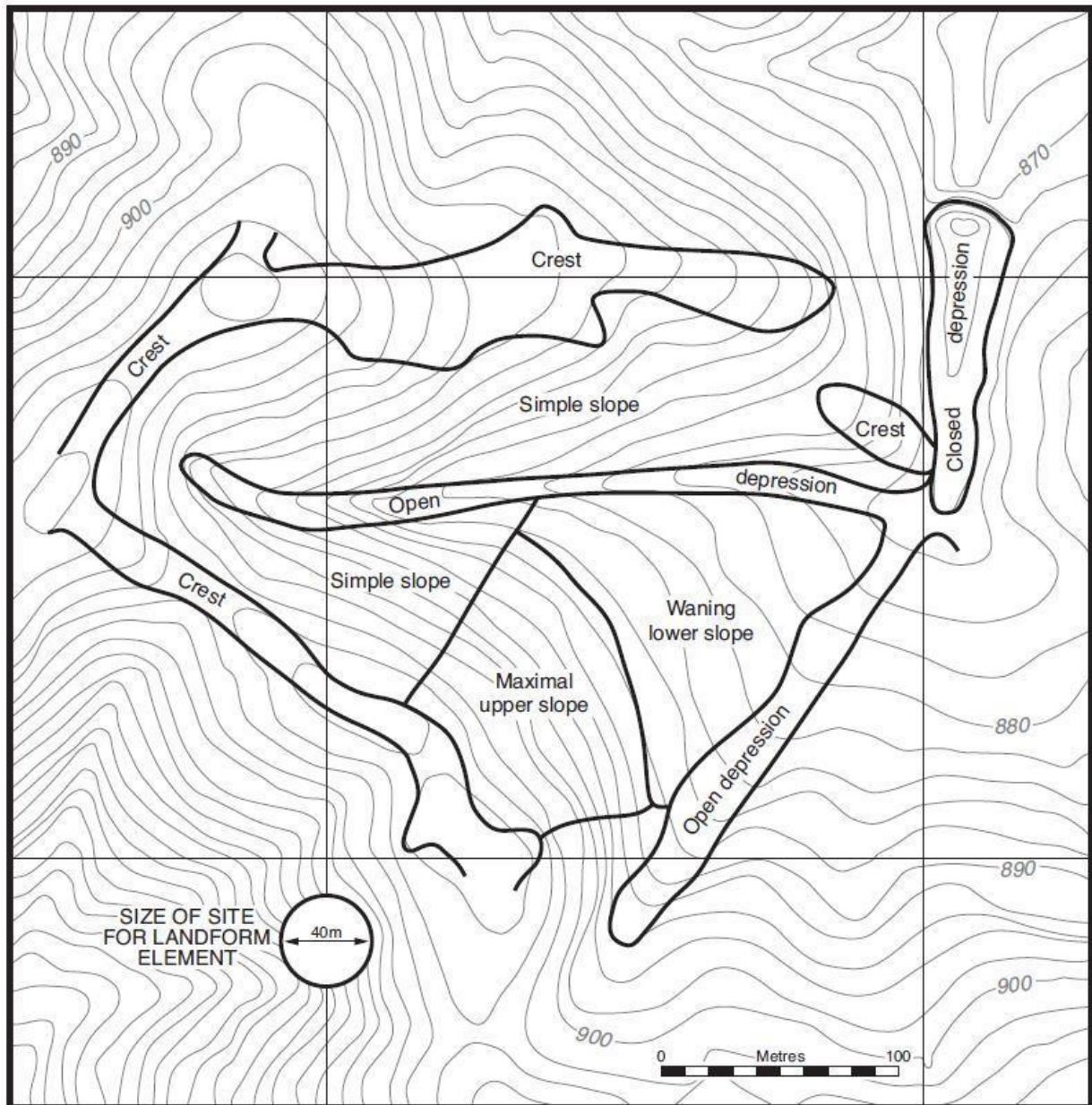


Figure 5: Reproduction from the *Australian Soil and Land Survey Field Handbook* (CSIRO 2009). A landform pattern of rolling low hills mapped into morphological types of landform element. Note that the crests and depressions in this case are mainly narrower than the recommended site size.

Aerial imagery of the study area dated to 1943 (Figure 7) suggests that the landforms within the study area have been heavily modified. 1943 imagery shows a sandstone platform and a steeply elevated landscape which has been levelled to allow the construction of modern buildings. Existing contour data of the subject area shows the western portion of the study area that makes up 800 Pittwater Road consists of a waning lower slope landform, while the remainder of the study area is made up of a simple slope that reaches a crest to the east of the study area (Figure 6).





Figure 6: Landforms within the study area

### 3.3 Ethnohistoric Context

#### 3.3.1 Regional History

Aboriginal occupation of the Sydney basin is likely to have extended from 20 000 years, although dates as high as 40 000 have been claimed for sites associated with the Nepean River (Stockton and Holland 1974; Nanson et al 1987; Stockton 1993). The study area is located within the traditional lands of the Cammerigal and Wullumedegal peoples of the Kuring-gai tribe.

The change in sea level has undulated between the lowest level, 30 000 and 18 000 years ago (between 110 m and 130 m below the current level) and the highest, 11 500 and 7 000 years ago (approximately 1-2 m above the current water level). Due to the change in water level it is likely that the earliest sites along the Pleistocene shoreline have since been inundated by the rising sea level.

The archaeological record shows that throughout the Sydney region Aboriginal sites are distributed across a range of environmental zones and physiographic units, but particular landscape features are more likely to contain certain types of site. For example, midden material is more likely to be identified in association with river and lakes or the coast in areas where shellfish are available (AMBS 2012:14).

There were early accounts by First Fleet diarists that indicated that frequent movements occurred between Port Jackson to the south of study area and Broken Bay to the north by Aboriginal people. Established tracks were noted, and items which were exchanged with people in Port Jackson were observed in Broken Bay to the north by March 1788 (Attenbrow 2010:54).

The occupation of the coastal regions appeared to be year-round, with population depending on the season. Surgeon White recorded on a trip along the coast in August 1788 seeing “all along the shore we met the natives, who seem to have no fixed residence or abode, but, indiscriminately, whenever they meet with a hut, or, what is more common, a convenient excavation or hole in the rocks, take possession of it for a time”(White 1790 [1962:157]).

The population of Aboriginal people around Sydney was depleted by disease and land appropriation soon after the arrival of European settlers and within a few decades traditional Aboriginal lifestyle patterns in the Sydney area were virtually destroyed.

#### 3.3.2 Local History

The suburb of Dee Why is located within the Northern Beaches Local Government Area (LGA). The locality of Dee Why was named by James Meehan as he surveyed the area in 1815 and noted his location in his field book as ‘Dy Beach’ (he was in fact standing on Freshwater Beach at the time). Meehan used the term ‘Dy’ to cover a large geographic area which extended from Freshwater Beach to Dee Why Lagoon. It is unknown what ‘Dy’ was referring to, theories suggest that it may be part of the Aboriginal name for the area, or a mis-transcription of ‘*deewae*’ which was the sound of small water birds living in the wetlands. The transcription of ‘DY’ was lengthened to ‘Deewhy’ and then separated to ‘Dee Why’ as it is today (Dictionary of Sydney).

Stony Range Reserve was formerly a stone quarry. The current reserve was constructed between 1951-1975 by volunteers. All vegetation postdates the 1950s (SHI Listing).



## St Luke's Grammar

The current St Luke's Grammar School was opened in February 1993 as the amalgamation of three Sydney Anglican Schools Corporation schools on the Northern Beaches, including the Roseby Preparatory School (1961 – 1992; the location of the current study area), Peninsula Grammar School (1983 – 1992) and St Luke's Anglican School for Girls (1965 – 1992).



**Figure 7: The site of St Luke's Grammar School in 1943. No development has taken place at this time**



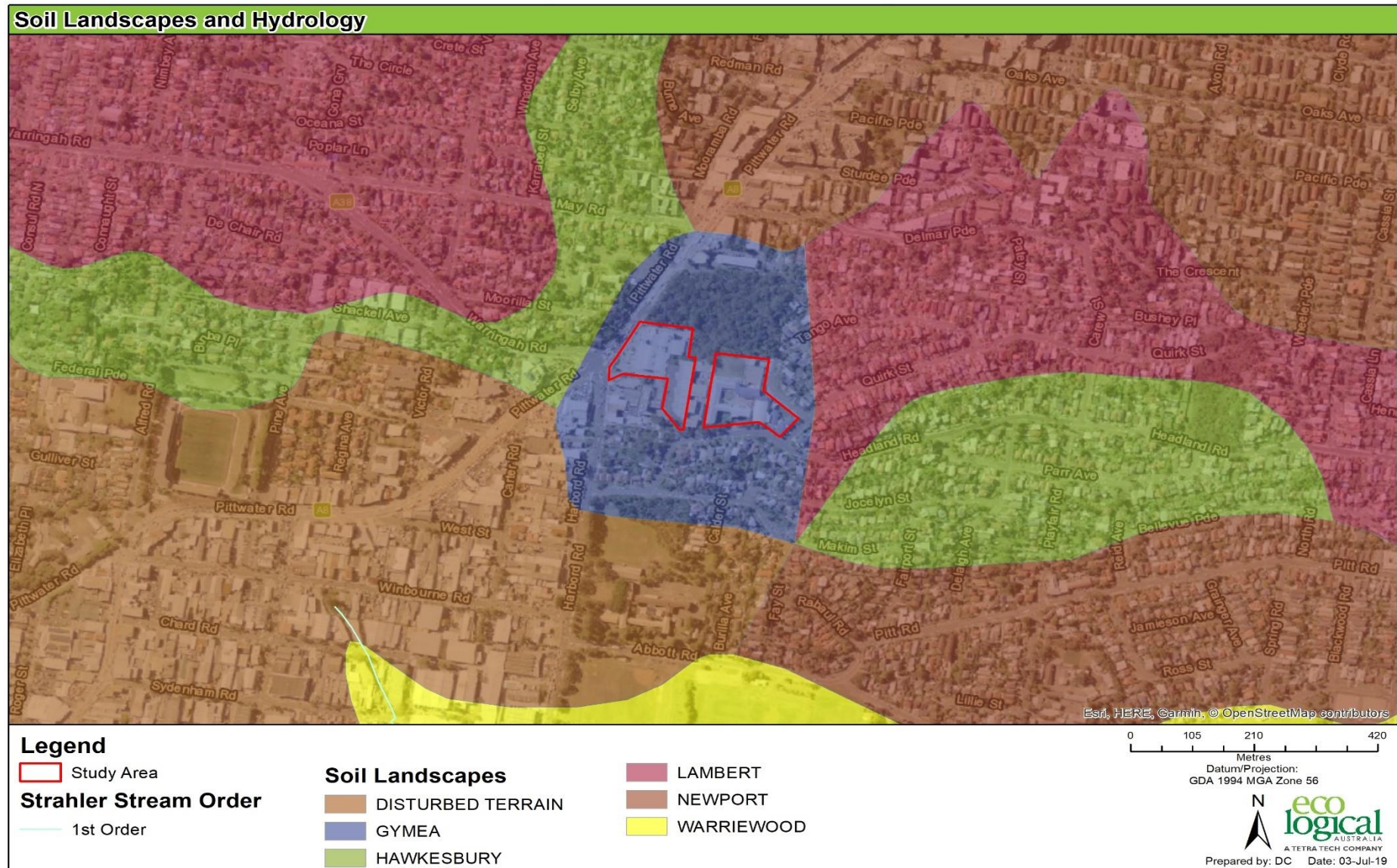


Figure 8: Soil landscapes and hydrology

## 4. Consultation

As part of the Aboriginal cultural heritage assessment (ACHA) for the proposed works, Aboriginal consultation has been undertaken and is ongoing following the *Aboriginal Cultural Heritage Consultation Requirements for Proponents'* (DECCW 2010b) guidelines.

Consultation with registered Aboriginal parties for this Aboriginal cultural heritage assessment has been conducted in line with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents'* (DECCW 2010b). This has ensured that Aboriginal stakeholders have been able to register and therefore be fully engaged on all aspects relating to cultural heritage for this project.

The consultation requirements follow four clear consultation stages. The following chapter outlines the process ELA used to fully consult with Aboriginal people on this development proposal.

### 4.1 Stage 1 – Notification of project proposal and registration of interest

#### 4.1.1 Placement of advertisement in local newspaper

An advertisement was placed in the Manly Daily on 10 July 2019 by ELA, inviting interested Aboriginal stakeholders to register to be consulted in relation to the proposed works (**Appendix A**).

#### 4.1.2 Written request for information about Aboriginal organisations

ELA on behalf of the proponent undertook a registration process for Aboriginal people with knowledge of the area. ELA wrote to the following organisations (as per *4.1.2 Aboriginal Cultural Heritage Consultation Requirements for Proponents' guidelines* (DECCW 2010b) on 25 June 2019, in order to identify Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects:

- The relevant DPIE regional office (Regional Operations Group, Metropolitan Department of Planning and Environment)
- The Metropolitan Local Aboriginal Land Council
- The Registrar, Aboriginal Land Rights Act 1983
- The National Native Title Tribunal
- Native Title Services Corporation Limited (NTSCORP Limited)
- The Northern Beaches Council
- The Greater Sydney Catchment Management Authority.

Details of the letters and organisational responses are included in **Appendix A**.

#### 4.1.3 Letters to Aboriginal organisations

As per 4.1.3 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents' guidelines* (DECCW 2010b), ELA wrote to the Aboriginal organisations identified through the above process on 02 July 2019, inviting them to register an interest in the project. The registration closing date was set as 24 July 2019.

Section 4.1.4 of the DECCW's *Aboriginal cultural heritage consultation requirements for proponents 2010* only requires a minimum of 14 days for Aboriginal stakeholders to register their interest to be consulted for an ACHA. However, it has always and will continue to be ELA's policy to register all individuals/groups regardless of the mandatory closing date of registration.

Details of the letters, advertisement and responses are included in **Appendix A**.

Registrants became the Registered Aboriginal Parties (RAPs) for the project. Table 2 below details the RAPs for the project.

**Table 2: Registered Aboriginal Parties**

Organisation	Contact Name
Amanda Hickey Cultural Services	Amanda Hickey
Barking Owl Aboriginal Corporation	Jody Kulakowski
Darug Land Observations	Jamie Workman
A1 Archaeological Services	Carolyn Hickey
Widescope Indigenous Services	Steven Hickey
Metropolitan LALC	Selina Timothy

## 4.2 Stage 2 and Stage 3 - Presentation of information about the proposed project and gathering information about cultural significance

### 4.2.1 Project information and methodology

A document describing the project and methodology for identifying Aboriginal cultural heritage values within the study area was sent to the RAPs for the project on 15 August 2019, with a deadline for review set for 12 September 2019. One (1) response was received during the 28-day review period Table 3.

**Table 3: RAP responses to the draft methodology**

Organisation	Contact Name	Response
Darug Land Observations	Jamie Workman	Supports the methodology

### 4.2.2 Archaeological Survey

Site survey of each property proposed for the campus expansion was undertaken by ELA Archaeologist Daniel Claggett and Selina Timothy, Heritage Site Officer with Metropolitan LALC, on 15 August 2019.

**Section 5.3** of the ACHA describes in full detail the findings and results of the site survey.

## 4.3 Stage 4 – Review of draft cultural heritage report

No responses were received from the RAPs for this project during the 28-day ACHA review period.

## 5. Summary and Analysis of Background Information

### 5.1 AHIMS sites

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) database was undertaken by ELA on the 10 December 2018 using the following search parameters:

Datum: GDA 94 Zone 56

Eastings: 339952 - 3421952

Northings: 6262250 - 6264250

Six (6) registered Aboriginal sites and zero Aboriginal places were identified to be within 2 km of the study area during the AHIMS search (**Appendix B**). The distribution of recorded Aboriginal sites surrounding the study area is shown in Figure 9. The frequencies of site types and contexts recorded within the AHIMS database search area are listed in Table 4:

**Table 4: Frequencies of site types and contexts**

Site Features	Number	%
Art (Pigment or Engraved)	2	33.3%
Midden	1	16.6%
Midden; Artefact	1	16.7%
Potential Archaeological Deposit (PAD)	2	33.4%
<b>Total</b>	<b>6</b>	<b>100%</b>

Zero (0) AHIMS sites identified during this search are within or adjacent to the study areas.





Figure 9: AHIMS sites within 3.5 km of the study area

### 5.1.1 Previous archaeological studies – Regional

The greater Sydney region contains several thousand recorded Aboriginal sites (AHIMS), with new sites being recorded constantly as a result of archaeological investigations associated with the environmental approvals process for new development, as well as academic studies. There is limited understanding of Aboriginal activity and land-use patterns in the Sydney region prior to European settlement, due to the early displacement and disruption of Aboriginal people from their traditional land. Early European accounts of Aboriginal groups in the Cumberland Plain suggests that the new settlers did not initially believe Aboriginal people lived inland, but were confined to the coast, taking advantage of the abundant marine resources available (Artefact Heritage 2017). Early archaeological investigations within Sydney concentrated largely upon the foreshore, due to the extensive disturbance carried out by the development of the city. The findings of these early archaeological investigations do suggest a heavy reliance on marine resources by Aboriginal groups living in the Sydney area, with numerous shell midden sites identified across the foreshore of Sydney CBD (Attenbrow 1991; Attenbrow 1992; Lampert and Truscott 1984).

Overall, the survivability of Aboriginal archaeological deposits on sites throughout the Sydney region depends on the nature and extent on development that has taken place. For example, the excavation of basements or car parks substantially lowers the survivability potential of archaeological deposits, due to the deep excavation necessary. In contrast, some phases of construction can act to preserve natural soil profiles intact. An archaeological salvage excavation report by Baker (2004) along William Street, Woolloomooloo demonstrated that sandstone footings from an early phase of construction in the area had served to protect the underlying Aboriginal archaeological deposit during subsequent phases of construction above. Despite the high-density development of the Sydney region, there are a range of variables to consider when determining the survivability of artefact deposits in a given area.

### 5.1.2 Previous archaeological studies - Local

Numerous archaeological investigations within the broader area have been undertaken, but they mostly involved the identification of rock engraving, rock art and midden sites as these are the most visible remnants of Aboriginal occupation in the landscape. Aboriginal rock art sites have been identified since the nineteenth century (Campbell 1899). In 1974 Anne Ross and the Sydney University Prehistory Group undertook a series of surveys to identify rock art and midden sites associated with Deep Creek, which is north of the current study area. In 1987 Brayshaw and Macdonald undertook a survey of the coast (excluding beaches) between Palm Beach and Queenscliff as a preliminary assessment for a coastal walkway constructed for the Bicentenary in 1988. They identified five new midden sites associated with headlands identified during the survey.

Table 5 below provides a brief summary of archaeological studies undertaken within the Northern Beaches area.



**Table 5: Heritage studies conducted within the Northern Beaches area**

Title	Summary
Haglund, L. (1991) Archaeological Investigations at Cromer, NSW: Test Excavations of Two Shelters in Lot 2, Maybrook Ave	<p>Haglund was commissioned by Craig and Rhodes Consultants Pty Ltd to undertake test excavations at two rock shelters identified at the western end of Maybrook Avenue, Cromer, approximately 4 km northwest of the current study area.</p> <p>The largest rock shelter (AHIMS 45-6-1493) was north-facing and comprised of an area approximately 25 m wide and 2.3 m deep. It had been previously assessed several times (Haglund 1983, 1987; Dallas 1987). Modern anthropogenic disturbance – comprising of rubbish, graffiti, and drug paraphernalia – had been noted during these previous assessments. The smaller shelter was only 5.5 m wide and 2 m deep, and comparatively undisturbed.</p> <p>Three test pits were excavated in AHIMS 45-6-1493. A total of 479 lithics were identified, mostly consisting of flake fragments and flaked pieces. The artefactual assemblage was dominated by quartz (96.5%). One test pit was excavated in the smaller rock shelter. No artefactual materials were identified.</p> <p>Haglund determined that, whilst AHIMS 45-6-1493 certainly contained evidence of Aboriginal occupation, the low density of artefacts and lack of archaeological potential across the remainder of the site indicated that occupation was transitory and occasional.</p>
Comber Consulting (2010) Aboriginal Cultural Heritage Assessment: 132 Rose Avenue, Wheeler Heights	<p>Comber Consulting was commissioned by WEM Property Ventures Pty Ltd to undertake an Aboriginal archaeological assessment for a proposed subdivision and development in Wheeler Heights, approximately 3.6 km north of the current study area.</p> <p>The site comprised of an existing house allotment. The allotment had been extensively disturbed through the removal of vast amounts of stone in order to level the site and the subsequent construction of the dwelling and outbuildings. Comber Consulting determined that there was no suitable sandstone outcrops for rock shelters, no evidence of rock engravings, no trees of a suitable age to display evidence of cultural modification, and no areas suitable for subsurface archaeological deposits.</p>
Oliver Brown Consulting Archaeology (2011) 28 Rodborough Road, Frenchs Forest: Due Diligence Aboriginal Heritage Impact Assessment	<p>Oliver Brown Consulting Archaeology (OBCA) was commissioned by Platino Properties to undertake an Aboriginal due diligence assessment for a known Aboriginal rock engraving located in Frenchs Forest, approximately 3.2 km west of the current study area.</p> <p>Byrne (1986) assessed the site for several rock engravings anecdotally reported to exist on the site. Although several of the engravings reported to be present could not be located, the depictions of a kangaroo and a fish were identified. Whilst the kangaroo was noted to be in good condition, the fish was observed to be faint and it was determined that the latter animal was not suitable for preservation. A 'consent to destroy' was issued for the fish engraving.</p> <p>OBCA revisited the site in order to determine the condition of the kangaroo engraving and whether the fish was still present. The kangaroo was located beneath the floating floor of the present development; OBCA presumed that the floor had been sited in order to preserve the engraving, although did note that the tail had likely been damaged by the installation of a fence. The fish engraving could not be relocated, but OBCA suggested that it may also be present beneath the floating floor, albeit covered by debris.</p>

Title	Summary
Australian Museum Business Services (2012) Northern Beaches Health Services, Frenchs Forest: Aboriginal Heritage Impact Assessment	<p>AMBS was commissioned by SMEC Australia Pty Ltd to prepare an Aboriginal Heritage Impact Assessment for the proposed Northern Beaches Hospital, located in Frenchs Forest NSW, approximately 4.5 km from the current study area.</p> <p>The Northern Beaches Hospital Development site consisted of two areas in Frenchs Forest. The Bantry Bay Road area is bound by Wakehurst Parkway, Warringah Road and Frenchs Forest Road West. The second area is southeast of the Bantry Bay Road area, on Aquatic Drive east of the block on the corner of Madison Way and west of the Cerebral Palsy building. As part of this assessment, Aboriginal community consultation was undertaken by AMBS and a survey of the study area by AMBS archaeologists included Aboriginal community representatives.</p> <p>Site survey identified a major portion of the study area as having been highly disturbed and containing almost no intact topsoil, indicating low potential for intact or substantial Aboriginal stone artefact deposits. However, sandstone outcrops were identified in the north east section of the Bantry Bay Road area that had potential to possess art / engravings underneath dense vegetation obscuring it. AMBS recommended that any impact within this area would require pre-construction vegetation removal and inspection by an archaeologist to confirm whether or not engravings are present.</p>
Eco Logical Australia (2018) Historical and Aboriginal Heritage Assessment – Dee Why Lagoon Pedestrian Bridge, Dee Why NSW	<p>ELA was engaged by the Northern Beaches Council to undertake an Aboriginal and Historical Heritage Assessment for a proposed footbridge across the mouth of Dee Why Lagoon, located approximately 2.3 km northeast of the current study area.</p> <p>No Aboriginal sites or objects were located during the site inspection. No scarred trees were identified during the field survey. All the vegetation was low scrub and grasses, which would not have been used for cultural modification. The study area was located within an active erosion zone, with widespread natural disturbance and modification of the area over time. 1943 aerial imagery of the site demonstrated that the current vegetation in the area had been planted in order to combat the loss of beach sand across the width of the beach. As a result of the desktop and visual inspection, it was determined that Aboriginal sites were unlikely to have been retained within the study area due to the active sand movement at the lagoon mouth, and that therefore no further Aboriginal heritage assessments were required.</p>
Eco Logical Australia (2018) Aboriginal Heritage Due Diligence Assessment – 53 Little Willandra Road, Oxford Falls NSW	<p>ELA was engaged by LMY Management and Investments to undertake an Aboriginal Heritage Due Diligence Assessment for the proposed redevelopment of a property at 53 Little Willandra Road, Oxford Falls NSW, located approximately 2.5 km northwest of the current study area.</p> <p>Site survey of the study area found it to be undisturbed, consisting of wetland vegetation, large eucalypts, and a complex of sandstone ledges and outcrops.</p> <p>Surface visibility was low to nil due to heavy vegetation across the property, however an inspection of the sandstone ledges and outcrops on the steep slope within the western portion of the study area, resulted in the identification of a previously unregistered rock shelter site containing a Potential Archaeological Deposit (PAD). The rock shelter site was identified as being 50 m away from the proposed development and not expected to be impacted by the proposed development. The rest of the study area was assessed as having low archaeological potential and no further assessment was recommended.</p>



## 5.2 Summary

Based on the results of previous studies within the local area, the presence of Aboriginal sites within the Northern Beaches LGA is determined by both sensitive landscape features (major waterways and sandstone outcroppings) and the level of past ground disturbance present in the current study area. Dee Why has been subjected to extensive disturbance associated with the early development of the Sydney region, reducing the potential for Aboriginal sites to have survived. However, areas nearby major waterways or within sandstone outcroppings still have the potential to possess Aboriginal sites and artefacts.

## 5.3 Field Survey

Site survey of each study area was undertaken by ELA Archaeologist Daniel Claggett and Selina Timothy, Heritage Site Officer with Metropolitan LALC, on 15 August 2019. A separate report by Metropolitan LALC is attached below (**Appendix C**).

The field survey employed the following methods:

- A pedestrian survey method was employed. The team used a meander technique throughout the survey, due to most the survey being conducted in the built-up areas. Areas of higher ground surface visibility and exposures were closely inspected.
- The methodology for recording any identified Aboriginal sites and / or PADs within the project area were recorded using a GPS and photographed, details were recorded using standardised recording forms based on the Code of Practice requirements.
- Any new Aboriginal sites would require the completion of an Aboriginal heritage site recording form (AHIMS Site Card) as mandatory under s89A of the NPW Act.
- Notes were taken on identified landforms, areas of archaeological sensitivity, vegetation coverage, land use and disturbance activities which formed the basis of the field notes for the survey.
- Any cultural information, information about Aboriginal resources or comments made by the Aboriginal representative involved in the field survey on the management of cultural values of the project area was noted and recorded.

### 5.3.1 Summary of field survey

The site identified heavy disturbance due to urban development in both properties. The original sandstone outcrop has been cut and levelled extensively to allow for the construction of buildings, roads and other infrastructure in the area. Although a flora reserve is located adjacent the two properties, the vegetation dates post 1960s as the site was formerly a quarry. All mature-growth vegetation has been cleared from the study area, with only small pockets of regrowth vegetation remaining. The 1943 aerial image clearly demonstrates that the study area was devoid of vegetation at that time.

The portion of the study area located along 224 Headland Road (SP45082; Survey Unit 1) is located on top of cut and modified sandstone and has been entirely developed by the construction of a carpark (Figure 10) and warehouses (Figure 11). A steeply descending driveway leads out to Headland Road (Figure 12). The only vegetation located in this area is located along the driveway, which contains small portion of regrowth vegetation (Figure 13).



Figure 10: Carparking facilities occupying a large portion of 224 Headland Road, facing south



Figure 11: Warehouses located in 224 Headland Road, facing southeast



Figure 12: Driveway that leads to Headland Road, facing southeast



Figure 13: Remnant vegetation located along the driveway at 224 Headland Road, facing southeast



Figure 14: Carparking located along the frontage of the Wormald Building, 800 Pittwater Road



Figure 15: The entrance to the Wormald Building, facing east



**Figure 16: A portion of the Stony Range Flora Reserve adjacent the eastern border of 800 Pittwater Road, facing southeast**

The portion of the study area located along 800 Pittwater Road (Lot 6 DP523299; Survey Unit 2) also consists of a heavily disturbed landscape. A large, underground carpark extends across a large portion of the lot and the remainder of the lot has been developed over by carpark (Figure 14) and the heritage-listed Wormald Building (Figure 15). Although a floral reserve containing native bushland is located directly adjacent this property (Figure 16), no Aboriginal sites have been identified in this area and the proposed works will not impact upon the conservation area. Site survey identified low to nil archaeological potential across the whole study area. All survey has been completed in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010).

**Table 6: Survey coverage**

Survey Unit (SU)	Landform	Survey Area (m <sup>2</sup> )	Unit (SUA)	Visibility (V) %	Exposure (E) %	Effective coverage area (ECA)	Effective coverage %
1	Artificially Terraced Flats	5,245		0	0	0	0
2	Artificially Terraced Flats	10,300		0	0	0	0

**Table 7: Landform summary - sampled area**

Landform	Landform Area	Area effectively surveyed	% of landform effectively surveyed	Number of sites	Number of artefacts or features
Artificially Terraced Flats	15,545 m <sup>2</sup>	0	0	0	0

## 6. Cultural Heritage Values and Statement of Significance

The *Australia ICOMOS Burra Charter 1999* provides guidance for the assessment, conservation and management of places of cultural significance. Cultural significance is defined in the Burra Charter as ‘a concept which helps in estimating the value of places’. The places that are likely to be of significance are those which help an understanding of the past or enrich the present, and which will be of value to future generations” (ICOMOS Burra Charter 1988:12). The Burra Charter provides a definition of cultural significance as “aesthetic, historic, scientific, social or spiritual value for past, present or future generations”. Aboriginal cultural heritage sites can be assessed through the application of these five principle values.

- Social or cultural value (assessed only by Aboriginal people);
- Historical value;
- Scientific/archaeological value (assessed mostly by archaeologists/heritage consultants);
- Aesthetic value;
- Spiritual value.

This section presents an assessment of Aboriginal cultural heritage values based on these principles.

### 6.1 Description of cultural heritage values

The review of background information and information gained through consultation with Aboriginal people should provide insight into past events. These include how the landscape was used and why the identified Aboriginal objects are in this location, along with contemporary uses of the land. The following descriptions of cultural heritage values are drawn from the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011).

**Social or cultural value** refers to the spiritual, traditional, historical or contemporary associations and attachments the place or area has for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them.

**Historic value** refers to the associations of a place with a historically important person, event, phase or activity in an Aboriginal community. Historic places do not always have physical evidence of their historical importance (such as structures, planted vegetation or landscape modifications). They may have ‘shared’ historic values with other (non-Aboriginal) communities and include places of post-contact Aboriginal history.

**Scientific (archaeological) value** refers to the importance of a landscape, area, place or object because of its rarity, representativeness and the extent to which it may contribute to further understanding and information (Australian ICOMOS 1988).

**Aesthetic value** refers to the sensory, scenic, architectural and creative aspects of the place. It is often closely linked with the social values. It may consider form, scale, colour, texture and material of the fabric or landscape, and the smell and sounds associated with the place and its use (Australian ICOMOS 1988).



**Spiritual value** is a more recent inclusion in the Burra Charter, dating from 1999. Australia ICOMOS has not defined this value.

## 6.2 Aboriginal Cultural Values Assessment

### 6.2.1 Social significance

Aboriginal cultural values can only be determined through consultation with the Aboriginal community. All Aboriginal sites are considered to have cultural significance to the Aboriginal community as they provide physical evidence of past Aboriginal use and occupation of the area. Aboriginal cultural significance may include social, spiritual, historic and archaeological values, and is determined by the Aboriginal community.

The study area does not meet this criterion.

### 6.2.2 Aesthetic significance

As noted above aesthetic significance is often closely linked to social and cultural significance. Generally aesthetic significance is considered to mean the visual beauty of a place. Examples of archaeological sites that may have high aesthetic values include rock art sites or sites located in visually pleasing environments (NSW NPWS 1997: 11).

The study area does not meet this criterion.

### 6.2.3 Historic significance

The study area does not meet this criterion.

### 6.2.4 Scientific significance

As with cultural, historic, and aesthetic significance; scientific significance can be difficult to establish. Certain criteria must therefore be addressed in order to assess the scientific significance of archaeological sites. Scientific significance contains four subsets; research potential, representativeness, rarity and educational potential. These are outlined below.

**Research Potential:** is the ability of a site to contribute to our understanding of Aboriginal occupation locally and on a regional scale. The potential for the site to build a chronology, the level of disturbance within a site, and the relationship between the site and other sites in the archaeological landscape are factors which are considered when determining the research potential of a site.

The study area does not meet this criterion.

**Representativeness:** is defined as the level of how well or how accurately something reflects upon a sample. The objective of this criterion is to determine if the class of site being assessed should be conserved in order to ensure that a representative sample of the archaeological record be retained. The conservation objective which underwrites the 'representativeness' criteria is that such a sample should be conserved (NSW NPWS 1997: 7-9).

The study area does not meet this criterion.

**Rarity:** This criterion is similar to that of representativeness, it is defined as something rare, unusual, or uncommon. If a site is uncommon or rare it will fulfil the criterion of representativeness. The criterion

of rarity may be assessed at a range of levels including local, regional, state, national and global (NSW NPWS 1997: 10).

The study area does not meet this criterion.

**Educational Potential:** This criterion relates to the ability of the cultural heritage item or place to inform and/or educate people about one or other aspects of the past. It incorporates notions of intactness, relevance, interpretative value and accessibility. Where archaeologists or others carrying out cultural heritage assessments are promoting/advocating the educational value of a cultural heritage item or place it is imperative that public input and support for this value is achieved and sought. Without public input and support the educative value of the items/places is likely to not ever be fully realised (NSW NPWS 1997: 10).

The study area does not meet this criterion.

#### 6.2.5 Spiritual significance

The study area does not meet this criterion.

### 6.3 Statement of significance

The study area contained zero Aboriginal archaeological sites as defined under the *National Parks and Wildlife Act 1974*.

Site inspection revealed a high degree of disturbance across both properties proposed to be included in the St Luke's Grammar expansion. 224 Headland Road (SP45082) is situated upon a cut sandstone outcropping that has been almost entirely developed, with the exception of a small portion of regrowth vegetation in the southwest of the lot. 800 Pittwater Road (Lot 6 DP523299) contains an underground carpark across a large portion of the property, while the remainder of the property has been covered by carparks and the heritage-listed Wormald Building. Although both lots are located adjacent a flora reserve, there have been no Aboriginal heritage values identified within this reserve as it is a former quarry and there will be no impacts to the reserve as a result of the proposed campus expansion. There is nil archaeological potential across the entirety of the study area and there is no requirement for further archaeological assessment.

## 7. Development Proposal Activity

### 7.1 Overview

Midson Group on behalf of St Luke's Grammar School seeks to expand St Lukes by constructing a new senior school campus and sports centre for St Luke's Grammar School along 800 Pittwater Road and partially within 224 Headland Road, Dee Why NSW. Activities associated with the proposed works include landscape modifications and the construction of campus buildings and infrastructure.

It has been assessed that the proposed development will not impact any Aboriginal heritage sites.

### 7.2 Consideration of Ecologically Sustainable Development

#### 7.2.1 Principles of ESD

Ecological Sustainable Development (ESD) is defined by the Australian Government as 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased' (Australian Government, Department of the Environment and Energy website).

ESD is contained in both Commonwealth (EPBC Act 1999) and NSW statutes. Section 6 (2) of the *Protection of the Environment Administration Act 1991* (NSW) lists the principals of ESD as:

- a. the precautionary principle—namely, that 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.

In the application of the precautionary principle, public and private decisions should be guided by:

- i careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and
- ii an assessment of the risk-weighted consequences of various options,
- b. inter-generational equity—namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,
- c. conservation of biological diversity and ecological integrity—namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,
- d. improved valuation, pricing and incentive mechanisms—namely, that environmental factors should be included in the valuation of assets and services, such as:
  - i polluter pays—that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,
  - ii the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,

- iii environmental goals, having been established, should be pursued in the most cost-effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.

### 7.3 Cumulative Impact Assessment

Cumulative impact of any development on Aboriginal sites assesses the extent of the proposed impact on the site and how this will affect both the proportion of this type of Aboriginal site in the area and the impact this destruction will have on Aboriginal cultural heritage values generally in the area. For example, if an artefact scatter is destroyed in the course of a proposed development, how many site artefact scatters are likely to remain in that area and how will the destruction of that site affect the overall archaeological evidence remaining in that area. If a site type that was once common in an area becomes rare, the loss of that site (and site type) will affect our ability to understand past Aboriginal land uses, will result in an incomplete archaeological record and will negatively affect intergenerational equity.

#### 7.3.1 Effect on the proportion of this Type of Aboriginal Site in the Area

One method of calculating the proportion of this site type remaining in the area is to use the results of an AHIMS search.

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) covering a 2-kilometre square area around the study area was undertaken by ELA on 4 July 2019 using the following search parameters: Datum: GDA 94 Zone 56, Eastings: 339952 – 3421952, Northings: 6262250 – 6264250.

Six (6) registered Aboriginal sites and zero Aboriginal places were identified to be within 2 km of the study area during the AHIMS search (**Appendix B**). The distribution of recorded Aboriginal sites surrounding the study area is shown in Figure 9. The frequencies of site types and contexts recorded within the AHIMS database search area are listed in Table 8:

**Table 8: Frequencies of site types and contexts**

Site Features	Number	%
Art (Pigment or Engraved)	2	33.3%
Midden	1	16.6%
Midden; Artefact	1	16.7%
Potential Archaeological Deposit (PAD)	2	33.4%
<b>Total</b>	<b>6</b>	<b>100%</b>

Zero (0) registered AHIMS sites will be impacted and there will be no cumulative impact on Aboriginal heritage in the area by the proposed development.



## 8. Avoiding and or Mitigating Harm

The ACHA has identified that zero Aboriginal heritage sites will be harmed by the proposed development. No archaeological mitigation measures are required.

## 9. Management Recommendations

Based on the findings of this Aboriginal Cultural Heritage Assessment (ACHA) and the archaeological investigation, the following is recommended:

### **Recommendation 1 – No further assessment warranted, works may proceed with caution**

No further archaeological assessment is warranted for the study area. Although general measures will need to be undertaken. These general measures include:

- Aboriginal objects are protected under the NP&W Act regardless if they are registered on AHIMS or not. If suspected Aboriginal objects, such as stone artefacts are located during future works, works must cease in the affected area and an archaeologist called in to assess the finds.
- If the finds are found to be Aboriginal objects, the DPIE must be notified under section 89A of the NPW Act. Appropriate management and avoidance or approval under a section 90 AHIP should then be sought if Aboriginal objects are to be moved or harmed.
- In the extremely unlikely event that human remains are found, works should immediately cease, and the NSW Police should be contacted. If the remains are suspected to be Aboriginal, the DPIE may also be contacted at this time to assist in determining appropriate management

### **Recommendation 2 – Submit ACHA/ATR to AHIMS**

- In accordance with Chapter 3 of the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011) the ACHA should be submitted for registration on the AHIMS register and sent to all Registered Aboriginal Parties within three months of completion.

## 10. References

- Attenbrow, V., 2010. *Sydney's Aboriginal Past: Investigating the archaeological and historical records*. Sydney: University of NSW Press.
- Australian Museum Business Services, 2012. *Northern Beaches Health Services, Frenchs Forest: Aboriginal Heritage Impact Assessment*. Prepared for SMEC Australia.
- Australian Heritage Commission, 2002. *Ask First: A Guide to Respecting Indigenous Heritage Places and Values*.
- Bannerman SM and Hazelton PA, 1990, *Soil Landscapes of the Penrith 1:100,000 Sheet map and report*. Soil Conservation Service of NSW, Sydney.
- Besold, J. 2013. *Language Recovery of the New South Wales South Coast Aboriginal Languages*. Unpublished PhD Thesis, Australian National University.
- Boot, P. G. 2002. *Didthul, Bhundoo, Gulaga, and Wadbilliga: An Archaeological Study of the Aboriginals of the New South Wales South Coast Hinterland*. Unpublished PhD Thesis, Australian National University.
- Brown, S. 2008. 'Mute or mutable? Archaeological significance, research, and cultural heritage management in Australia'. *Australian Archaeology*, 67:19-30.
- Byrne, D., Brayshaw, H. and Ireland, T. 2003. *Social Significance: A Discussion Paper*. Hurstville, Australia: New South Wales National Parks and Wildlife Service.
- Comber Consulting, 2010. *Aboriginal Cultural Heritage Assessment: 132 Rose Avenue, Wheeler Heights*. Prepared for WEM Property Ventures.
- Department of Environment, Climate Change and Water (DECCW), 2010a. Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW, Hurstville, NSW.
- Department of Environment, Climate Change and Water (DECCW), 2010b. Aboriginal cultural heritage consultation requirements for proponents 2010. Hurstville, NSW.
- Department of Environment, Climate Change and Water (DECCW), 2010c. Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW, Hurstville, NSW.
- Department of Environment, Climate Change and Water NSW, 2010, Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales.
- Eco Logical Australia, 2018. *Aboriginal Heritage Due Diligence Assessment – 53 Little Willandra Road, Oxford Falls NSW*. Prepared for LMY Management and Investments.
- Eco Logical Australia, 2018. *Historical and Aboriginal Heritage Assessment – Dee Why Lagoon Pedestrian Bridge, Dee Why NSW*. Prepared for Northern Beaches Council.

Haglund, L., 1991. *Archaeological Investigations at Cromer, NSW: Test Excavations of Two Shelters in Lot 2, Maybrook Ave.* Prepared for Craig and Rhodes Consultants.

Office of Environment and Heritage. 2011a. Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW.

Oliver Brown Consulting Archaeology, 2011. *28 Rodborough Road, Frenchs Forest: Due Diligence Aboriginal Heritage Impact Assessment.* Prepared for Platino Properties.

White, B and McDonald, J 2010 Lithic artefact distribution in the Rouse Hill Development Area, Cumberland Plain, New South Wales. *Australian Archaeology* No 70, p29-38.

## Appendix A Consultation Log

Date	Action	Organization
25/06/2019	ELA wrote to DPIE requesting contact information on any Aboriginal People with an interest in the proposed project/ Holding cultural knowledge of the project area	Department of Planning, Industry and Environment (DPIE)
25/06/2019	ELA wrote to Metropolitan LALC (CEO) requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area. We also invited them to register their interest in the project.	Metropolitan LALC
25/06/2019	ELA wrote to ORALRA requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area.	Officer of the Registrar of Aboriginal Land Right Act (ORALRA)
25/06/2019	ELA wrote to NTS Corp requesting contact information on any Aboriginal People with an interest in the proposed project/ holding cultural knowledge of the project area.	Native Title Service Corporation (NTS Corp)
25/06/2019	ELA wrote to NNTT requesting contact information on any Aboriginal People with an interest in the proposed project/ holding cultural knowledge of the project area.	National Native Title Tribunal (NNTT)
25/06/2019	ELA wrote to Northern Beaches Council requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area.	Northern Beaches Council
25/06/2019	ELA wrote to the Greater Sydney Local Land Services (LLS) requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area.	Greater Sydney Local Land Services
10/07/2019	ELA published a notice of Aboriginal stakeholder consultation for the project in the North Shore Manly Daily newspaper	Manly Daily newspaper ad ran on 10/07/2019
01/07/2019	Notice of Stakeholder consultation invitations	Stakeholder list provided by DPIE



Date	Action	Organization
15/08/2019	ELA sent out a draft methodology to all parties	All RAPs
27/09/2019	ELA sent out draft Aboriginal cultural heritage report	All RAPs

## Organisational responses

Date	Action	Organisation
01/07/2019	Provided a list of Aboriginal People with a potential interest in the project.	DPIE
26/06/2019	<p>Thank you for your search request received on 25 June 2019 in relation to the above area, please find your results below. Please note: Records held by the National Native Title Tribunal as at 26 June 2019 indicate that the identified parcels Lot 6 DP523299, SP45082, and Lot 100 DP1251179 appear to be freehold, and freehold tenure extinguishes native title.</p> <p>The National Native Title Tribunal does not hold data sets for freehold tenure; consequently, we cannot conduct searches over freehold. For confirmation of freehold data, please contact the NSW Land and Property Information office or seek independent legal advice.</p>	National Native Title Tribunal
	No response	Metropolitan LALC
28/06/2019	<p>We refer to your letter dated 25 June 2019 ("Letter") regarding an Aboriginal Cultural Heritage Assessment for the proposed development at St Luke's Grammar School, Dee Why, NSW as indicated on the map attached to the Letter. Under Section 170 of the Aboriginal Land Rights Act 1983 the Office of the Registrar is required to maintain the Register of Aboriginal Owners (RAO). A search of the RAO has shown that there are not currently any Registered Aboriginal Owners in the project area. We note you will be contacting the Metropolitan Local Aboriginal Land Council on 02 8394 9666 as they may be able to assist you in identifying Aboriginal stakeholders who wish to participate.</p>	Officer of the Registrar of Aboriginal Land Right Act (ORALRA)
	No response	Native Title Service Corporation (NTS Corp)
15/07/2019	<p>In reference to your email of the 25 June 2019 requesting information on Aboriginal stakeholder information held by Council I provide the following advice. When Council collects and registers personal information it does so on a specific basis or purpose. Unfortunately, Council is unable to directly provide this information to third parties due to privacy concerns. However, I can forward your letter directly to the stakeholder group for their information and request they contact you directly to register their interest in the project. If you require further information, please contact me on 99701164.</p>	Northern Beaches Council
	No response	Greater Sydney Local Land Services

## Invitations to Aboriginal stakeholders

Date	Contact organisation	Contact Person	Action
02/07/2019	A1 Archaeological Services	Carolyn Hickey	Sent out invitations to RAPS as per OEH list
02/07/2019	Amanda Hickey Cultural Services	Amanda Hickey	Sent out invitations to RAPS as per OEH list
02/07/2019	Aragung Aboriginal Cultural Heritage Site Assessments	Jamie Eastwood	Sent out invitations to RAPS as per OEH list
02/07/2019	B.H. Heritage Consultants	Ralph & Nola Hampton	Sent out invitations to RAPS as per OEH list
02/07/2019	Barking Owl Aboriginal Corporation	Jody Kulakowski	Sent out invitations to RAPS as per OEH list
02/07/2019	Biamanga	Seli Storer	Sent out invitations to RAPS as per OEH list
02/07/2019	Bilinga	Simalene Carriage	Sent out invitations to RAPS as per OEH list
02/07/2019	Bilinga Cultural Heritage Technical Services	Robert Brown	Sent out invitations to RAPS as per OEH list
02/07/2019	Butucarbin Aboriginal Corporation	Jennifer Beale	Sent out invitations to RAPS as per OEH list
02/07/2019	Callendulla	Corey Smith	Sent out invitations to RAPS as per OEH list
02/07/2019	Darug Boorooberongal Elders Aboriginal Corp	Gordon Workman	Sent out invitations to RAPS as per OEH list
02/07/2019	Darug Land Observations	Jamie & Anna Workman	Sent out invitations to RAPS as per OEH list
02/07/2019	Dharug	Andrew Bond	Sent out invitations to RAPS as per OEH list
02/07/2019	Didge Ngunawal Clan	Lillylea Carroll Paul Boyd	Sent out invitations to RAPS as per OEH list
02/07/2019	DJMD Consultancy	Darren Duncan	Sent out invitations to RAPS as per OEH list
02/07/2019	Ginninderra Aboriginal Corporation	Steven Johnson and Krystle Carroll	Sent out invitations to RAPS as per OEH list
02/07/2019	Goobah Developments	Basil Smith	Sent out invitations to RAPS as per OEH list
02/07/2019	Goodradigbee Cultural & Heritage Aboriginal Corp	Caine Carroll	Sent out invitations to RAPS as per OEH list
02/07/2019	Gulaga	Wendy Smith	Sent out invitations to RAPS as per OEH list
02/07/2019	Gunyyu	Kylie Ann Bell	Sent out invitations to RAPS as per OEH list

Date	Contact organisation	Contact Person	Action
02/07/2019	Gunyuu Cultural Heritage Technical Services	Darlene Hoskins- McKenzie	Sent out invitations to RAPS as per OEH list
02/07/2019	Jerringong	Joanne Anne Stewart	Sent out invitations to RAPS as per OEH list
02/07/2019	Metropolitan LALC	Selina Timothy	Sent out invitations to RAPS as per OEH list
02/07/2019	Munyunga	Kaya Dawn Bell	Sent out invitations to RAPS as per OEH list
02/07/2019	Munyunga Cultural Heritage Technical Services	Suzannah McKenzie	Sent out invitations to RAPS as per OEH list
02/07/2019	Murramarang	Roxanne Smith	Sent out invitations to RAPS as per OEH list
02/07/2019	Murrumbul	Mark Henry	Sent out invitations to RAPS as per OEH list
02/07/2019	Murrumbul Cultural Heritage Technical Services	Levi McKenzie- Kirkbright	Sent out invitations to RAPS as per OEH list
02/07/2019	Nerrigundah	Newton Carriage	Sent out invitations to RAPS as per OEH list
02/07/2019	Ngambaa Cultural Connections	Kaarina Slater	Sent out invitations to RAPS as per OEH list
02/07/2019	Nundagurri	Newton Carriage	Sent out invitations to RAPS as per OEH list
02/07/2019	Pemulwuy CHTS	Pemulwuy Johnson	Sent out invitations to RAPS as per OEH list
02/07/2019	Thauaira	Shane Carriage	Sent out invitations to RAPS as per OEH list
02/07/2019	Thoorga Nura	John Carriage	Sent out invitations to RAPS as per OEH list
02/07/2019	Tocomwall	Scott Franks	Sent out invitations to RAPS as per OEH list
02/07/2019	Wailwan Aboriginal Group	Philip Boney	Sent out invitations to RAPS as per OEH list
02/07/2019	Walbunja	Hika Te Kowhai	Sent out invitations to RAPS as per OEH list
02/07/2019	Walgalu	Ronald Stewart	Sent out invitations to RAPS as per OEH list
02/07/2019	Wingikara	Hayley Bell	Sent out invitations to RAPS as per OEH list
02/07/2019	Wingikara Cultural Heritage Technical Services	Wandai Kirkbright	Sent out invitations to RAPS as per OEH list
02/07/2019	Yerramurra	Robert Parson	Sent out invitations to RAPS as per OEH list

Date	Contact organisation	Contact Person	Action
02/07/2019	Badu	Karia Lea Bond	Sent out invitations to RAPS as per OEH list
02/07/2019	Darug Aboriginal Cultural Heritage Assessments	Celestine Everingham, Gordon Morton	Sent out invitations to RAPS as per OEH list
02/07/2019	Eric Keidge	Eric Keidge	Sent out invitations to RAPS as per OEH list
02/07/2019	Minnamunnung	Aaron Broad	Sent out invitations to RAPS as per OEH list
02/07/2019	Mura Indigenous Corporation	Phillip Carroll	Sent out invitations to RAPS as per OEH list
02/07/2019	Wullung	Lee-Roy James Boota	Sent out invitations to RAPS as per OEH list

Registered Aboriginal Party	Contact Name	Date of Registration
Darug Land Observations	Jamie & Anna Workman	02-07-19
Amanda Hickey Cultural Services	Amanda Hickey	02-07-19
Barking Owl Aboriginal Corporation	Jody Kulakowski	02-07-19
A1 Archaeological Services	Carolyn Hickey	14-07-19
Widescope	Steven Hickey	04-07-19
Metropolitan LALC	Selina Timothy	15-08-19 (verbal)

### Responses to draft methodology

Registered Party	Aboriginal	Contact Name	Date Responded	Response
Darug Land Observations		Jamie Workman	05-09-19	Darug Land Observations Pty Ltd has reviewed the project information and assessment methodology, and supports the methodology for the proposed redevelopment of existing buildings and expansion/construction of new campus buildings for St Luke's Grammar School, of Lot 6 DP 523299 and SP 45082, located at 800 Pittwater Road and 224 Headland Road, in Dee Why.

### Responses to draft ACHA

Registered Aboriginal Party	Contact Name	Date Responded	Response
-----------------------------	--------------	----------------	----------

No responses were received during the Draft ACHA review period.

## Consultation Stage 1 Detail



Level 3 101 Sussex Street Sydney NSW 2000  
t: (02) 9529 3800

25 June 2019

Office of Environment and Heritage  
Greater Sydney Region  
Regional Operations  
PO Box 644 Parramatta NSW 2124  
gs.ach@environment.nsw.gov.au

Attention: Susan Harrison

**RE: Aboriginal Cultural Heritage Assessment – St Luke's Grammar School, Dee Why, NSW**

Eco Logical Australia (ELA) has been engaged by Midson Group Pty Ltd to conduct an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development planning approval for the proposed expansion of St Luke's Grammar School, located in Dee Why, NSW (**Figure 1**). The proposed works will consist of the construction of a new senior school campus and sports centre. Please refer to the bottom of this letter for client contact details.

In accordance with the SEARs, the proposed works require an ACHA in support of future approvals. Consultation will be undertaken in line with the Office of Environment and Heritage (OEH) *Aboriginal cultural heritage consultation requirements for proponents 2010*. In accordance with the SEARs, proponents must provide the opportunity for Aboriginal people who hold cultural knowledge relevant to the proposed project area to be involved in the assessment process.

As per Section 4.1.2 of the OEH *Aboriginal cultural heritage consultation requirements for proponents (2010)* we would appreciate if you would provide us with a contact list of Aboriginal people registered with your organisation who may hold cultural knowledge relevant to the project area identified above. The project area falls within the Metropolitan Local Aboriginal Land Council (LALC) and Northern Beaches Council area. ELA will be contacting Metropolitan LALC directly as part of this consultation.

It would be appreciated if you could provide information on any Aboriginal people or organisations who we should invite to register for consultation. If you have any further questions in relation to the upcoming Aboriginal consultation process I can be contacted on 02 9259 3772. Please forward your response to Daniel Claggett, Level 3, 101 Sussex Street, Sydney NSW 2000 or email [daniel.claggett@ecoaus.com.au](mailto:daniel.claggett@ecoaus.com.au). I thank you for your attention in this matter.



Regards,



Daniel Claggett  
Archaeologist

**Client Contact Details**  
**Toby James**

---

**Midson Group Pty Ltd**  
Suite 7, 33 Alexandra Street  
Hunters Hill, NSW  
2110  
P: 02 9868 6923  
E: [tjames@midsongroup.com.au](mailto:tjames@midsongroup.com.au)



**Figure 1: Location of the Proposed Works**

## Responses from organisations contacted in section 4.1.2 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents' (DECCW 2010)



15 July 2019

Daniel Claggett  
Archaeologist  
Eco Logical, Australia  
PO Box Q1082 Queen Victoria Building NSW 1230

Our Ref: 2019/393269

Dear Daniel,

### **Request for Aboriginal Stakeholder Groups – St Lukes School, Dee Why NSW**

In reference to your email of the 25 June 2019 requesting information on Aboriginal stakeholder information held by Council I provide the following advice.

When Council collects and registers personal information it does so on a specific basis or purpose. Unfortunately Council is unable to directly provide this information to third parties due privacy concerns. However I can forward your letter directly to the stakeholder group for their information and request they contact you directly to register their interest in the project.

If you require further information please contact me on 99701164.

Yours sincerely

A handwritten signature in green ink, appearing to read "Anne-Maree".

Anne-Maree Newbery

Manager Strategic and Place Planning

PO Box 82 Manly NSW 1655  
t 1300 434 434 f 02 9976 1400  
council@northernbeaches.nsw.gov.au  
ABN 57 284 295 198

**Dee Why Office:**  
725 Pittwater Road  
Dee Why NSW 2099

**Mona Vale Office:**  
1 Park Street  
Mona Vale NSW 2103

**Manly Office:**  
1 Belgrave Street  
Manly NSW 2095

**Avalon Office:**  
59A Old Barrenjoey Road  
Avalon Beach NSW 2107




Wed 03-Jul-19 9:01 AM

Margaret Bottrell <margaret.bottrell@lls.nsw.gov.au>

Aboriginal Cultural Heritage Assessment – St Luke's Grammar School, Dee Why, NSW

To:  Claggett, Daniel

 If there are problems with how this message is displayed, click here to view it in a web browser.

Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

To Daniel Claggett,

**RE: Aboriginal Cultural Heritage Assessment – St Luke's Grammar School, Dee Why, NSW**

Thank you for your letter dated 25 June 2019, requesting assistance with identifying Aboriginal stakeholder groups or persons who may have an interest in your project area.

Greater Sydney Local Land Services (GS LLS) acknowledges that Local Land Services have been listed in *Section 4.1.2 (g)* of the *Aboriginal cultural heritage consultation requirements for proponents 2010*, under *Part 6, National Parks and Wildlife Act 1974* as a source of information to obtain the "names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places".

GS LLS is a partner with many Aboriginal communities in the region on many natural resource management (NRM) projects. However, GS LLS is not the primary source for contacting or managing contact lists for Aboriginal communities or persons that may inform or provide comment on planning issues. GS LLS considers cultural heritage issues that relate to land-use planning in general and only considers culture and heritage issues in the context of NRM.

We strongly recommend that you make contact with the Office of Environment and Heritage (OEH), Cultural Heritage Division, for all-inclusive contact lists of persons and organisations that may assist with your investigation.

**Note:** Hawkesbury Nepean Catchment Management Authority (HNCMA) no longer exists. All work previously carried out by HNCMA is now delivered by Greater Sydney Local Land Services (GS LLS).

Regards,

--  
**Margaret Bottrell** Senior Strategic Land Services Officer  
(Aboriginal Communities)

Greater Sydney Local Land Service

Level 4, 2-6 Station Street Penrith

PO Box 4515 Penrith Westfields NSW 2750

T: 02 47242111

E: [margaret.bottrell@lls.nsw.gov.au](mailto:margaret.bottrell@lls.nsw.gov.au)

W: <http://www.lls.nsw.gov.au>

GS Wed 26-Jun-19 6:09 PM  
Geospatial Search Requests <GeospatialSearch@NNTT.gov.au>  
RE: SR6000 - Request for Aboriginal Stakeholder Groups - St Lukes Grammar School, Dee Why NSW - SR6000  
To: Claggett, Daniel

UNCLASSIFIED

**Native title search** – NSW Parcels – Lot 6 DP523299, SP45082, Lot 100 DP1251179 and Lot 2112 DP752038  
**Your ref:** 13213 - **Our ref:** SR6000

Dear Daniel Claggett,

Thank you for your search request received on 25 June 2019 in relation to the above area, please find your results below.

**Please note:** Records held by the National Native Title Tribunal as at 26 June 2019 indicate that the identified parcels Lot 6 DP523299, SP45082, and Lot 100 DP1251179 appear to be freehold, and freehold tenure extinguishes native title. The National Native Title Tribunal does not hold data sets for freehold tenure; consequently, we **cannot** conduct searches over freehold. For confirmation of freehold data, please contact the NSW Land and Property Information office or seek independent legal advice.

**Search Results**

The results provided are based on the information you supplied and are derived from a search of the following Tribunal databases:

- Schedule of Native Title Determination Applications
- Register of Native Title Claims
- Native Title Determinations
- Register of Indigenous Land Use Agreements
- Notified Indigenous Land Use Agreements

For more information about the Tribunal's registers or to search the registers yourself and obtain copies of relevant register extracts, please visit our [website](#).

Parcel ID	Feature Area SqKm	NNTT file number	Name	Category	Percent Selected Feature
2112/D752038	0.0107	<a href="#">No overlap</a>			0.00%

Parcel ID
100/D1251179
6/D523299
SP45082

**Please note:** There may be a delay between a native title determination application being lodged in the Federal Court and its transfer to the Tribunal. As a result, some native title determination applications recently filed with the Federal Court may not appear on the Tribunal's databases.

The search results are based on analysis against external boundaries of applications only. Native title applications commonly contain exclusions clauses which remove areas from within the external boundary. To determine whether the areas described are in fact subject to claim, you need to refer to the "Area covered by claim" section of the relevant Register Extract or Schedule Extract and any maps attached.

**Search results and the existence of native title**

Please note that the enclosed information from the Register of Native Title Claims and/or the Schedule of Applications is **not** confirmation of the existence of native title in this area. This cannot be confirmed until the Federal Court makes a determination that native title does or does not exist in relation to the area. Such determinations are registered on the National Native Title Register.

**The Tribunal accepts no liability for reliance placed on enclosed information**

The enclosed information has been provided in good faith. Use of this information is at your sole risk. The National Native Title Tribunal makes no representation, either express or implied, as to the accuracy or suitability of the information enclosed for any particular purpose and accepts no liability for use of the information or reliance placed on it.

If you have any further queries, please do not hesitate to contact us on the free call number 1800 640 501.





**Office of  
Environment  
& Heritage**

Our reference: SF19/544591

Daniel Claggett  
Archaeologist  
Eco Logical Australia  
Level 3, 101 Sussex Street  
Sydney NSW 2000.

Dear Daniel,

Thank you for your letter dated 25<sup>th</sup> June 2019 to the Office of Environment and Heritage (OEH) regarding obtaining a list of the Aboriginal stakeholders that may have an interest in the proposed development for the St Lukes Grammar School, Dee Why NSW.

Please find attached the list of Aboriginal stakeholders known to OEH that may have an interest in the project.

As the Department of Planning and Environment is the approval authority for this project, the consultation process should be in accordance with the relevant guidelines as stipulated by the Department of Planning and Environment.

If you wish to discuss any of the above matter further please email [gs.ach@environment.nsw.gov.au](mailto:gs.ach@environment.nsw.gov.au).

Yours sincerely

*S. Harrison 27/06/19*

**Susan Harrison**  
**Senior Team Leader Planning**  
**Greater Sydney Branch**  
**Communities and Greater Sydney Division**

PO Box 644 Parramatta NSW 2124  
Level 2, 10 Valentine Avenue Parramatta NSW 2150  
Tel: (02) 9995 5477  
ABN 30 841 387 271  
[www.environment.nsw.gov.au](http://www.environment.nsw.gov.au)



28 June 2019

By email: Daniel.Claggett@ecoaus.com.au

Daniel Claggett  
Archaeologist  
Eco Logical Australia Pty Ltd  
Level 3, 101 Sussex Street  
SYDNEY NSW 2000

Dear Daniel,

**Request - Search for Registered Aboriginal Owners**

We refer to your letter dated 25 June 2019 ("Letter") regarding an Aboriginal Cultural Heritage Assessment for the proposed development at St Luke's Grammar School, Dee Why, NSW as indicated on the map attached to the Letter.

Under Section 170 of the *Aboriginal Land Rights Act 1983* the Office of the Registrar is required to maintain the Register of Aboriginal Owners (RAO). A search of the RAO has shown that there are not currently any Registered Aboriginal Owners in the project area.

We note you will be contacting the Metropolitan Local Aboriginal Land Council on 02 8394 9666 as they may be able to assist you in identifying Aboriginal stakeholders who wish to participate.

Yours sincerely

**Elizabeth Loane**  
**Project Officer, Aboriginal Owners**  
Office of the Registrar, ALRA

Address: Level 3, 2 – 10 Wentworth Street, PARRAMATTA NSW 2150  
Post: P.O Box 5068, PARRAMATTA NSW 2124  
Phone: 02 8633 1266

Advertisement published in the Manly Daily on 10 July 2019

## Notices

### General Notices

#### **Notice of Aboriginal Stakeholder Consultation**

Eco Logical Australia (ELA) has been engaged by Midson Group Pty Ltd to conduct an Aboriginal Cultural Heritage Assessment (ACHA) to support a Development Application for a proposed expansion to St Luke's Grammar School, Dee Why NSW. This notice is an invitation for interested Aboriginal organisations or people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project to register an interest in a process of community consultation with the proposed applicant regarding the proposed activity.

Interested Aboriginal organisations are invited to register their interest to be consulted in writing to:

Daniel Claggett, Eco Logical Australia, Level 3, 101 Sussex Street, Sydney NSW 2000 E: [daniel.claggett@ecoaus.com.au](mailto:daniel.claggett@ecoaus.com.au) P: 02 9259 3772

Expressions of interest should include current contact details. Closing date for registration is 24 July 2019.

Please note Aboriginal people who register an interest will have their details forwarded to the OEH and Local Aboriginal Land Council (LALC) unless they specify that they do not want their details released.

Please note that under OEH guidelines registration for consultation does not guarantee employment.

Client contact details: Toby James, Midson Group, Suite 7, 33 Alexandra Street, Hunters Hill NSW 2110 P: 02 9868 6923.

---

## Letters sent to Aboriginal people listed as having an interest in the Northern Beaches LGA as identified through section 4.1.2 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents' (DECCW 2010) and responses



Level 3 101 Sussex Street Sydney NSW 2000  
t: (02) 9529 3800

02 July 2019

To Whom It May Concern,

### **Aboriginal Cultural Heritage Assessment – St Luke's Grammar School, Dee Why NSW – Notice of Aboriginal Stakeholder Consultation**

Eco Logical Australia (ELA) has been engaged by Midson Group Pty Ltd to conduct an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development planning approval for the proposed expansion of St Luke's Grammar School, located in Dee Why, NSW (**Figure 1**). The proposed works will consist of the construction of a new senior school campus and sports centre. Please refer to the bottom of this letter for client contact details.

In accordance with the SEARs, the proposed works require an ACHA in support of future approvals. Consultation will be undertaken in line with the Office of Environment and Heritage (OEH) guidelines for *Aboriginal cultural heritage consultation requirements for proponents 2010*. Proponents must provide the opportunity for Aboriginal people who hold cultural knowledge relevant to the proposed project area to be involved in the assessment process.

This letter is an invitation for Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal objects and places in the area of the proposed project to register an interest in a process of community consultation with Midson Group. Your contact details have been provided to ELA by the Office of Environment and Heritage (OEH) as a person / or group who may have a cultural interest in the proposed project. Please note that fieldwork is not expected to be undertaken as part of this ACHA.

The purpose of the community consultation with Aboriginal people is to assist the proponent in understanding the cultural significance of the project area and to determine the likelihood of Aboriginal sites or objects being present within the project area.

Interested Aboriginal organisations or people having cultural knowledge relating to this area are invited to register their interest to be consulted in writing to: Daniel Claggett, Eco Logical Australia, Level 3, 101 Sussex Street, Sydney NSW 2000 – email [daniel.claggett@ecoaus.com.au](mailto:daniel.claggett@ecoaus.com.au) - telephone: 02 9259 3772 by: **Wednesday 24 July 2019.**

Please note under the consultation requirements your details will be forwarded to the OEH and the Local Aboriginal Land Council (LALC) upon receipt of your registration of interest. If you do not wish to have your details forwarded on to the LALC please notify ELA when registering your interest in the proposed project. In addition, also note that under OEH guidelines registration for consultation does not guarantee employment.

Regards,



Daniel Claggett  
Archaeologist

**Client Contact Details**  
**Toby James**

---

**Midson Group Pty Ltd**

Suite 7, 33 Alexandra Street

Hunters Hill, NSW

2110

P: 02 9868 6923

E: [tjames@midsongroup.com.au](mailto:tjames@midsongroup.com.au)





**Figure 1: Location of the proposed works**

## RAP responses to the Aboriginal stakeholder consultation invitation

Thu 04-Jul-19 7:36 PM  
WIDESCOPE . <widescope.group@live.com>  
Aboriginal Stakeholder Consultation - St Luke's Grammar School, Dee Why NSW

To: Claggett, Daniel

**CAUTION:** This email originated from an external sender. Verify the source before opening links or attachments.

Hi,

Please register my interest in the Aboriginal Cultural heritage assessment for St Luke's Grammar School, Dee Why NSW

I am a recognised indigenous cultural knowledge holder. I hold knowledge relevant in determining the significance of Aboriginal objects and places. I hold a cultural connection to the project area and surrounding areas

My preferred Method of contact is Via Email:  
Or Mob 0425230693  
Admin 0425232056

My level of involvement:  
I would like to attend Community Consultation meetings and to be considered for field survey works. Thank you I look forward to assisting with the Aboriginal Cultural Heritage part of the project

Regards  
Steven Hickey

Sun 14-Jul-19 11:59 AM  
Caza X <cazadirect@live.com>  
Re: Notice of Aboriginal Stakeholder Consultation - St Luke's Grammar School, Dee Why NSW

To: Claggett, Daniel

If there are problems with how this message is displayed, click here to view it in a web browser.

**CAUTION:** This email originated from an external sender.

**A1**

**Indigenous Services**  
Contact: Carolyn  
M: 0411650057  
E: [Cazadirect@live.com](mailto:Cazadirect@live.com)  
A: 10 Marie Pitt Place, Glenmore Park, NSW 2745  
ABN: 20 616 970 327

Hi,  
A1 would like to register for consultation, and any future field work.  
Thank you  
Carolyn Hickey

Tue 02-Jul-19 6:49 PM  
AH Amanda Hickey <Amandahickey@live.com.au>  
Luke's Grammar School in Dee Why, NSW

To: Claggett, Daniel

If there are problems with how this message is displayed, click here to view it in a web browser.

**CAUTION:** This email originated from an external sender.

Hi Daniel

Thank you for your email  
AHCS would like to register an interest in the consultation process and any upcoming field works for Luke's Grammar School in Dee Why, NSW

AHCS holds cultural knowledge towards determining indigenous artefacts and cultural knowledge towards the land.

Thank you for your time and look forward to hearing from you soon

Have a great day  
Amanda AHCS

Get [Outlook for Android](#)



**Barking Owl Aboriginal Corporation**

**ICN: 8822 ABN: 88241973761**

**2-65/69 Wehlow St MT DRUITT NSW 2770**

**[barkingowlcorp@gmail.com](mailto:barkingowlcorp@gmail.com)**

---

**2 July 2019**

Dear Daniel,

**RE: ST LUKES GRAMMAR SCHOOL DEE WHY ABORIGINAL CULTURAL HERITAGE ASSESSMENT**

We would like to register interest for full consultation and involvement in the study area.

**Registering Aboriginal Party:** Barking Owl Aboriginal Corporation  
**Contact Person:** Jody Kulakowski  
**Phone:** 0426 242 015  
**Email:** [barkingowlcorp@gmail.com](mailto:barkingowlcorp@gmail.com) (preferred contact method)

Cultural connection - The area is an important part of our culture due to previous generations living in and around the area, we maintain a special connection and responsibility as current generations whom continue to reside nearby and share in stories of our history relating to the location.

We are able to provide fit and hardworking site officers to assist with work that may involve physical labour with current white cards and all PPE equipment.

We can provide copies of relevant certificates of currency for business insurances on request.

Members put forward have experience in a variety of community consultation projects.

Please feel free to contact by email [barkingowlcorp@gmail.com](mailto:barkingowlcorp@gmail.com) if you require any further information.

Kind regards  
Jody Kulakowski  
BOAC



**DARUG LAND  
OBSERVATIONS PTY LTD  
ABN 27 602 765 453**

---

EMAIL: [DARUGLANDOBSERVATIONS@GMAIL.COM](mailto:DARUGLANDOBSERVATIONS@GMAIL.COM)  
PO BOX 173 ULLADULLA NSW 2539  
MOBILE: 0413 687 279

1<sup>st</sup> July, 2019

Daniel Claggett  
Eco Logical Australia  
Level 3, 101 Sussex Street  
SYDNEY NSW 2000

**Notification and Registration of ALL Aboriginal Interests**

RE: PROPOSED EXPANSION OF ST LUKE'S GRAMMAR SCHOOL,  
DEE WHY  
Aboriginal Cultural Heritage Assessment

Dear Daniel,

Please be advised that Darug Land Observations Pty Ltd is seeking to be involved in any and all consultation meetings and fieldwork.

This office specialises in Aboriginal and community consultations, and has a membership that comprises of Traditional owners from the area in question. Those retain strong story, song lines, oral history and continued contact.

We would also like to state that we do not accept or support any person or organisation that are NOT from the DARUG Nation that comments regarding the said area.

Please also be advised that this Aboriginal organisation does not do volunteer work or attend unpaid meetings. I hope that you advise your client of this so that, 'This Group', will not be discriminated against and refused paid fieldwork. DLO's rate is \$440 half day (less than 4 hours) and \$880 per day (flat rate), including GST.

All correspondence should be emailed to: [daruglandobservations@gmail.com](mailto:daruglandobservations@gmail.com) and any further consultation during this project can be directed to Anna O'Hara on mobile 0413 687 279.

Yours sincerely,

Jamie Workman  
Darug Land Observations Pty Ltd

The Late Uncle Gordon Workman  
Darug Elder

## Consultation Stage 2 and 3 Detail

### Responses to project background and methodology sent to RAPs



**DARUG LAND  
OBSERVATIONS PTY LTD  
ABN 27 602 765 453**

---

**EMAIL: DARUGLANDOBSERVATIONS@GMAIL.COM  
PO BOX 173 ULLADULLA NSW 2539  
MOBILE: 0413 687 279**

5<sup>th</sup> September 2019

Daniel Claggett  
Eco Logical Australia Pty Ltd  
Level 3, 101 Sussex Street  
SYDNEY NSW 2000

Email: Daniel.Claggett@ecoaus.com.au

Dear Daniel,

**RE: ST LUKES GRAMMAR SCHOOL, DEE WHY**

Aboriginal Cultural Heritage Assessment: Project Information & Methodology

Darug Land Observations Pty Ltd has reviewed the project information and assessment methodology, and supports the methodology for the proposed redevelopment of existing buildings and expansion/construction of new campus buildings for St Luke's Grammar School, of Lot 6 DP 523299 and SP 45082, located at 800 Pittwater Road and 224 Headland Road, in Dee Why.

Thank you and look forward to working with you again, in the near future.

Yours sincerely,

Jamie Workman  
Darug Land Observations Pty Ltd

The Late Uncle Gordon Workman  
Darug Elder



## RAP comments on draft ACHA

No responses were received from the RAPs for this project during the 28-day ACHA review period.

## Appendix B AHIMS Search Results



Office of  
Environment  
& Heritage

### AHIMS Web Services (AWS) Search Result

Purchase Order/Reference : 13213

Client Service ID : 432430

Eco Logical Australia Pty Ltd - Sydney

PO Box 12 668 Old Princes Hwy  
Sutherland New South Wales 1499

Attention: Daniel Claggett

Email: daniel.claggett@ecoaus.com.au

Date: 04 July 2019

Dear Sir or Madam:

**AHIMS Web Service search for the following area at Datum :GDA, Zone : 56, Eastings : 339952 - 341952, Northings : 6262250 - 6264250 with a Buffer of 0 meters, conducted by Daniel Claggett on 04 July 2019.**

The context area of your search is shown in the map below. Please note that the map does not accurately display the exact boundaries of the search as defined in the paragraph above. The map is to be used for general reference purposes only.



A search of the Office of the Environment and Heritage AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

<b>6</b>	<b>Aboriginal sites are recorded in or near the above location.</b>
<b>0</b>	<b>Aboriginal places have been declared in or near the above location. *</b>



Office of  
Environment  
& Heritage

## AHIMS Web Services (AWS)

### Extensive search - Site list report

Your Ref/PO Number : 13213

Client Service ID : 432430

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
45-6-0727	Dee Why;	AGD	56	341507	6263089	Open site	Valid	Art (Pigment or Engraved) : -	Rock Engraving	
	<b>Contact</b>	<b>Recorders</b>	ASRSYS							
45-6-0018	Dee Why	AGD	56	341244	6263385	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	
	<b>Contact</b>	<b>Recorders</b>	Charles.D Power							
45-6-2791	Studee Parade Shelter	GDA	56	341304	6263565	Closed site	Valid	Potential Archaeological Deposit (PAD) : 1		
	<b>Contact</b>	<b>Recorders</b>	Mr.Phil Hunt,Mr.Paul Irish							
45-6-2793	Sturdee Parade Shelter	AGD	56	341200	6263375	Closed site	Valid	Potential Archaeological Deposit (PAD) : -		
	<b>Contact</b>	<b>Recorders</b>	Mr.Paul Irish							
45-6-3140	Delmar Parade Engraving WARR191	GDA	56	341250	6263460	Open site	Valid	Art (Pigment or Engraved) : -		
	<b>Contact</b>	<b>Recorders</b>	Mr.Phil Hunt							
45-6-3229	Derribong Shelter 1 WARR188	GDA	56	341670	6263435	Open site	Valid	Shell : 1		
	<b>Contact</b>	<b>Recorders</b>	Mr.Phil Hunt,Aboriginal Heritage Office							

Report generated by AHIMS Web Service on 04/07/2019 for Daniel Claggett for the following area at Datum :GDA, Zone : 56, Eastings : 339952 - 341952, Northings : 6262250 - 6264250 with a Buffer of 0 meters. Additional Info : Aboriginal Cultural Heritage Assessment. Number of Aboriginal sites and Aboriginal objects found is 6

This information is not guaranteed to be free from error omission. Office of Environment and Heritage (NSW) and its employees disclaim liability for any act done or omission made on the information and consequences of such acts or omission.

