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URBIS

ABORIGINAL CULTURAL HERITAGE ASSESSMENT

Former Inwards Parcels Office

Prepared for

VERTICAL FIRST PTY LTD

23 September 2020

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Project Code	P0020770
Report Number	D005

Urbis acknowledges the important contribution that Aboriginal and Torres Strait Islander people make in creating a strong and vibrant Australian society.

We acknowledge in each of our offices the Traditional Owners on whose land we stand.

I

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EXECUTIVE SUMMARY

Urbis Pty Ltd (Urbis) was commissioned by Atlassian Pty Ltd (the proponent) to produce an Aboriginal Cultural Heritage Assessment Report (ACHAR) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) for the State Significant Development (SSD 10405) for a commercial and hotel development above the Former Inwards Parcel Shed at 8 – 10 Lee Street, Haymarket. This ACHA will accompany an Environmental Impact Statement (EIS). This ACHA was prepared in accordance with the following guidelines:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Department of Environment, Climate Change and Water (DECCW), 2010) (the Consultation Guidelines).
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage 2011) (the Assessment Guidelines).
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010).
- *The Australia ICOMOS Charter for Places of Cultural Significance, The Burra Charter, 2013* (Burra Charter).

The Site is known as 8-10 Lee Street, Haymarket. It is an irregular shaped allotment. The allotment has a small street frontage to Lee Street, however this frontage is limited to the width of the access handle.

The Site comprises multiple parcels of land which exist at various strata. All the lots are in the freehold ownership of Transport for NSW, with different leasing arrangements:

- **Lot 116 in DP 1078271:** YHA is currently the long-term leaseholder of the Site which covers the areas shown in blue below.
- **Lot 117 in DP 1078271:** This is currently in the ownership of TNSW and the applicant is seeking the transfer of the leasehold on this land to provide for an optimised basement and servicing outcome for the Site.
- **Lot 118 in DP 1078271:** This is currently in the ownership of TNSW and the applicant is seeking the transfer of the leasehold for part of the air-rights above part of this allotment to allow for an optimised building envelope for the project. The proposal also uses a part of Lot 118 in DP 1078271 within Ambulance Avenue for Day 1 vehicle access and services.
- **Lot 13 in DP 1062447:** This is currently in the ownership of TNSW but TOGA (who hold the lease for the Adina Hotel) have a long-term lease of this space in the lower ground area.

The Site has an area of approximately 3,485m² when measured at the Upper Ground Level.

The ACHAR conducted for the subject area concluded that:

- There are no Aboriginal sites registered within the subject area.
- Disturbance resulting from European occupation reduces the potential for intact soil profiles to remain within urban sites. In shallow soils profiles, this is likely to lower archaeological potential.
- Intact natural soils may be encountered in highly developed areas, below European fill. Where intact natural soils are encountered further assessment may be required to assess the archaeological potential.
- Dominant site types within the region include artefact scatters and Potential Archaeological Deposit (PAD) sites.
- Despite the high level of disturbance within the subject area there remains the potential for sand deposits associated with the Tuggerah Soil Landscape as well as a potential paleo channel to be located within the subject area. These features increase the potential for archaeological deposits (artefacts, middens, burials) to remain within the subject area below the current structures.
- Feedback gathered during the Consultation process identified the following: “*Despite the destructive impact of the first contact Gadigal culture survived. So, all of this area around Former Inwards Parcel Office is highly significant to Aboriginal People of the past and present.*” – Phil Khan (KYWG)

- The supplementary geotechnical investigation conducted by Douglas Partners (2020) concluded that across the subject area there is present 2-8m of fill material (which includes sand) over a discontinuous lens of loose to very loose sand alluvium up to 2m thick. These results confirm the assumptions made by Urbis in this assessment that Tuggerah Sands may occur within the subject area below the modern development. These sands contain moderate archaeological potential for subsurface artefact deposits and require further detailed investigation in the form of test excavation. Test excavation will mitigate the associated risk of impacting potential archaeological deposits.

Based on the conclusions of this assessment the proposed activity can proceed under the following recommendations:

Recommendation 1 – Archaeological Test Excavation

An Archaeological Research Design (ARD) and Methodology should be prepared for the sub-surface investigation of the identified landscape features and their potential for retaining Aboriginal objects and archaeological resources. The purpose of the archaeological test excavation is to confirm the presence or absence and if present, the potential extent of Aboriginal objects and archaeological resources within the subject area.

The archaeological test excavation must be undertaken according to the developed ARD and with the participation of the nominated Aboriginal RAPs and appropriately qualified archaeologists. The ARD must be developed in line with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010) (the Code of Practice). The ARD should be prepared in conjunction with the research design for the Non-Indigenous archaeological test excavation.

NOTE: The timing of the recommended test excavations is yet to be determined by the proponent. If the test excavations are to occur prior to the approval of SSD-10405 than they must be undertaken following an approved Aboriginal Heritage Impact Permit (AHIP) and in conjunction with an approved Section 60 required for associated historical archaeological investigations.

The results of the test excavations must be incorporated into the ACHAR or addendum document and supplied to the project RAPs for comment in accordance with *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Department of Environment, Climate Change and Water (DECCW), 2010) (the Consultation Guidelines). This will result in an additional 28 day review period.

Recommendation 2 – Aboriginal Cultural Heritage Induction

It is recommended that induction materials be prepared for inclusion in site inductions for any contractors working at the subject area. The induction material should include an overview of the types of sites to be aware of (i.e. artefact scatters or concentrations of shells that could be middens), obligations under the NPW Act, and the requirements of an archaeological finds' procedure (refer below). This should be prepared for the project and included in any site management plans.

The induction material may be paper based, included in any hard copy site management documents; or electronic, such as "PowerPoint" for any face to face site inductions.

Recommendation 3 – Archaeological Chance Find Procedure

Should any archaeological deposits be uncovered during any site works, a procedure must be implemented. The following steps must be carried out:

1. All works stop in the vicinity of the find. The find must not be moved 'out of the way' without assessment.
2. Site supervisor, or another nominated site representative must contact either the project archaeologist (if relevant) or DPIE to contact a suitably qualified archaeologist.
3. The nominated archaeologist examines the find, provides a preliminary assessment of significance, records the item and decides on appropriate management, in conjunction with the RAPs for the project. Such management may require further consultation with DPIE, preparation of a research design and archaeological investigation/salvage methodology and preparation of AHIMS Site Card.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required, and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies. Any such documentation should be appended to this ACHAR and revised accordingly.

6. Works in the vicinity of the find can only recommence upon relevant approvals from DPIE.

Recommendation 4 – Human Remains Procedure

In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

1. All works within the vicinity of the find immediately stop.
2. Site supervisor or other nominated manager must notify the NSW Police and DPIE.
3. The find must be assessed by the NSW Police, and may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the Police, DPIE and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

Recommendation 5 – RAP consultation

A copy of the final ACHA must be provided to all Project RAPs. Ongoing consultation with RAPs should occur as the project progresses, to ensure ongoing communication about the project and key milestones, and to ensure the consultation process does not lapse, particularly with regard to consultation should the CFP be enacted.

1. INTRODUCTION

1.1. PROJECT DESCRIPTION

The proposed SSDA will facilitate the development of a new mixed-use development comprising ‘*tourist and visitor accommodation*’ (in the form of a ‘backpackers’) and commercial office space within the tower form. Retail, lobby and food and drink premises at the Lower Ground level and Upper Ground level.

Atlassian Central at 8-10 Lee Street will be the new gateway development at Central Station which will anchor the new Technology Precinct proposed by the NSW Government. The new building will be purpose-built to accommodate the Atlassian Headquarters, a new TNSW Pedestrian Link Zone, and the new Railway Square YHA backpacker’s accommodation, in addition to commercial floorspace to support Tech Start-ups.

The new development is to be built over the existing heritage former Inwards Parcels Shed (the Parcels Shed) located on the western boundary of Central Station with the Adina hotel to the west. The works includes a 38-storey mixed-use tower with basement loading dock facilities and EOT facilities accessed off Lee Street, 2 storey lobby utilising the Parcels Shed building, lower ground and upper ground retail, YHA hostel and commercial tower with staff amenities to the mid-level and roof top areas and a pedestrian Link Zone works for TNSW.

The building design has been conceived to support the delivery of a site plan designed to connect with future developments to both the south and east and integrate with a cohesive public realm for the broader Sydney community in accordance with NSW government strategic planning.

The tower design is a demonstration project for Atlassian, representing their commitment to environmental sustainability and contemporary workplace settings through tower form and construction systems along with a set of emblematic outdoor workplaces stacked in the tower form.

The existing Parcels Shed will be adaptively re-used in accordance with best practice heritage process and form the upper level of a 2-storey entry volume that connects visually with the 2 level Link Zone. Over the roof of the Parcels Shed, a new privately owned but publicly accessible ‘elevated park’ will be created as the first part of a new upper level public realm that may extend to connect to a future Central Station concourse or future Over Station Development.

The proposed mixed use tower directly adjoins a live rail environment to the east and public domain to the north, west and south. These works will consider these rail environments and have been designed to ensure that all TNSW external development standards are achieved. This ensures there is no impact to the operation or safety of these TNSW assets.

Interfaces from the overall site and especially the State works Link Zone have been designed in consultation with the adjoining stakeholders. These stakeholders include TNSW to the north and south, Toga and the Adina Hotel operator to the west and the Dexs Fraser’s site to the south. Connections via the Link Zone, through the basements, and off the proposed new Link Zone dive ramp will be designed to enable existing and future developments to function in both the day 1 scenario and end state when all developers have completed their works.

The overall project aspiration is to create a world class tech precinct with effective pedestrian links through the Atlassian site to the Central Station western forecourt to Central Walk west and adjoining stakeholder’s sites.

1.2. DESCRIPTION OF SITE

The Site is known as 8-10 Lee Street, Haymarket. It is an irregular shaped allotment. The allotment has a small street frontage to Lee Street, however this frontage is limited to the width of the access handle.

The Site comprises multiple parcels of land which exist at various strata. All the lots are in the freehold ownership of Transport for NSW, with different leasing arrangements:

- **Lot 116 in DP 1078271:** YHA is currently the long-term leaseholder of the Site which covers the areas shown in blue below.
- **Lot 117 in DP 1078271:** This is currently in the ownership of TNSW and the applicant is seeking the transfer of the leasehold on this land to provide for an optimised basement and servicing outcome for the Site.

- **Lot 118 in DP 1078271:** This is currently in the ownership of TNSW and the applicant is seeking the transfer of the leasehold for part of the air-rights above part of this allotment to allow for an optimised building envelope for the project. The proposal also uses a part of Lot 118 in DP 1078271 within Ambulance Avenue for Day 1 vehicle access and services.
- **Lot 13 in DP 1062447:** This is currently in the ownership of TNSW but TOGA (who hold the lease for the Adina Hotel) have a long-term lease of this space in the lower ground area.

The Site has an area of approximately 3,485m² when measured at the Upper Ground Level.

1.3. SITE AND SURROUNDING CONTEXT

The Site is directly adjacent to the Western Wing Extension of Central Station, and forms part of the 'Western Gateway Sub-precinct' of the Central Railway Station lands. It is situated between the existing CountryLink and Intercity railway platforms to the east and the Adina Hotel (former Parcel Post Office) to the west.

Existing vehicle access to the Site is via Lee Street, however the Lee Street frontage of the Site is only the width of the access handle.

Current improvements on the Site include the Parcels Shed, which operated in association with the former Parcels Post Office (now the Adina Hotel). The Site is currently used as the Railway Square YHA. The Site also includes the western entryway to the Devonshire Street Pedestrian, which runs east-west through Central Station under the existing railway lines.

The Site is situated in one of the most well-connected locations in Sydney. It is directly adjacent to Central Station Railway which provides rail connections across metropolitan Sydney, as well as regional and interstate connections and a direct rail link to Sydney Airport. The Site is also within close proximity to several educational institutes and is a city fringe location which provides access to key support services.

Central Railway Station is currently undergoing rapid transformation to allow for integration of rail, metro and light rail transport infrastructure. This will elevate the role of Central Station not only for transport but also enhance opportunities for urban renewal and revitalisation of the surrounding precinct. This is one of the key drivers for the identification of the Central SSP and the Western Gateway Sub-precinct to accommodate a new innovation and technology precinct.

The proximity of the Western Gateway Sub-precinct to the city, while still being located outside the core Sydney CBD, provides opportunity for it to evolve to attract technology and innovation companies. It has access to all required services while being sufficiently separate to the CBD to establish a distinct technology industry ecosystem. Its CBD fringe location will provide affordable commercial rents which will support Startups and entrepreneurs which are a key component of an innovation precinct.

1.4. STATUTORY CONTROLS

Management of Aboriginal objects is under the statutory control of the *National Parks and Wildlife Act 1974* (NPW Act) further regulation of the process is outlined in the *National Parks and Wildlife Regulations 2009* (NPW Reg). This ACHA has been carried out in accordance to Part 6 of the NPW Act and Part 8A of the NPW Reg. The ACHAR was prepared the statutory guidelines under the NPW Act including:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Department of Environment, Climate Change and Water (DECCW), 2010) (the Consultation Guidelines).
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage 2011) (the Assessment Guidelines).
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010).
- *The Australia ICOMOS Charter for Places of Cultural Significance, The Burra Charter, 2013* (Burra Charter).

The ACHA is required to inform the Environmental Impact Statement (EIS) which will be submitted to support a State Significance Development Application (SSDA). The ACHA is to be carried out in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). The ACHA will also address the relevant requirements of the Department of Planning's Secretary's Environmental Assessment Requirements (SEARs).

1.4.1. Response to SEARs

The ACHAR is guided by the SEARs for SSD 10405. Table 1 identifies the relevant SEARs and the corresponding sections of this ACHAR.

Table 1 – SEARs and relevant report sections

SEARs Item – 12. Aboriginal Cultural Heritage	Report Section
Identify and describe Aboriginal cultural heritage values that exist across the whole area that will be affected by the development and document these in an Aboriginal Cultural Heritage Assessment Report (ACHAR).	Section 5.
Ensure consultation has taken place with Aboriginal people and is documented in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW)	Section 3.
Assess impacts on Aboriginal cultural heritage values and document them in the ACHAR. This must demonstrate attempts to avoid impacts, identify any conservation outcomes and measures to mitigate impacts.	Section 6 & 7.

1.4.2. City of Sydney Local Environment Plan 2012

As legislated by the Environmental Planning and Assessment Act 1979 (EP & A Act), each LGA is legally obliged to produce a Local Environment Plan (LEP). Within each LEP, Schedule 5 provides relevant information on locally listed heritage items, identifying items and areas of local heritage significance, and outlining consent requirements.

A search of the City of Sydney LEP 2012 was undertaken on 20th February 2020. The subject area is listed on the City of Sydney LEP, included in item #I824. This is listed on the LEP as ‘*Central Railway Station Group including buildings, station yard, viaducts and building interiors*’. The subject area is also adjacent to item #I855, which is identified as ‘*Former Parcels Post Office including retaining wall, early lamp post and building interior*’.

1.4.3. City of Sydney Development Control Plan 2012

As legislated by the EP & A Act, each LGA is legally obliged to produce a Development Control Plan (DCP). Not all LGAs provide information regarding Aboriginal cultural heritage and specific development controls to protect Aboriginal cultural heritage.

The City of Sydney DCP 2012 does not have a specific Aboriginal cultural heritage section. Controls relating to Aboriginal cultural heritage are mentioned in General Provisions – Section 3.9 Heritage. This section identifies the following objective:

Ensure that heritage significance is considered for heritage items, development within heritage conservation areas, and development affecting archaeological sites and places of Aboriginal heritage significance.

Controls relating to Aboriginal cultural heritage from the City of Sydney DCP 2012 and the correlating section of this report are outlined in Table 2 below.

Table 2 – City of Sydney DCP 2012 Aboriginal cultural heritage controls

Section	Text	Response
General Provisions, Section 3.9.3 – Archaeological Assessments.	(3) An archaeological assessment is to be submitted as part of the Statement of Environmental Effects for development applications affecting an archaeological site or a place of Aboriginal heritage significance, or	This report is prepared to identify any Aboriginal cultural materials or areas of

Section	Text	Response
	potential archaeological site that is likely to have heritage significance.	significance for the subject area.
General Provisions, Section 3.9.3 – Archaeological Assessments.	(4) An archaeological assessment is to include: (a) an assessment of the archaeological potential of the archaeological site or place of Aboriginal heritage significance.	This report is prepared to identify any Aboriginal cultural materials or areas of significance for the subject area.
General Provisions, Section 3.9.3 – Archaeological Assessments.	(c) the probable impact of the proposed development on the heritage significance of the archaeological site or place of Aboriginal heritage significance.	An impact assessment is included in Section 6.
General Provisions, Section 3.9.3 – Archaeological Assessments.	(e) a management strategy to conserve the heritage significance of the archaeological site or place of Aboriginal heritage significance	Management considerations are included in Section 7 and 8.

1.5. OBJECTIVES

The objectives of this ACHAR are to:

- Investigate the presence, or absence, of Aboriginal objects and/or places within and in close proximity to the subject area, and whether those objects and/or places would be impacted by the proposed development.
- Investigate the presence, or absence, of any landscape features that may have the potential to contain Aboriginal objects and/or sites and whether those objects and/or sites would be impacted by the proposed development.
- Document the nature, extent and significance of any Aboriginal objects and/or place and sites that may located within the subject area.
- Document consultation with the Registered Aboriginal Parties (RAPs) with the aim to identify any spiritual, traditional, historical or contemporary associations or attachments to the subject area and any Aboriginal objects and/or places that might be identified within the subject area.
- Provide management strategies for any identified Aboriginal objects and/or places or cultural heritage values.
- Provide recommendations for the implementation of the identified management strategies.
- Prepare a final Aboriginal Cultural Heritage Assessment Report (ACHAR) to be included in the Environmental Impact statement (EIS) for the proposed adaptive redevelopment.

1.6. AUTHORSHIP

This ACHAR has been prepared by Meggan Walker, Urbis Consultant Archaeologist, and Andrew Crisp, Urbis Senior Archaeologist, with review and quality control undertaken by Balazs Hansel, Urbis Associate Director Archaeology.

Meggan Walker has a Bachelor of Arts (Honours – First Class in Archaeology) from the University of Sydney. Andrew has a Bachelor of Arts (Honours – First Class in Archaeology) from the University of Sydney. Balazs Hansel has a Masters (History) from the University of Szeged in addition to Masters (Archaeology and Museum Studies) from the University of Szeged.



GDA 1994 MGA Zone 56

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Project No: P0020770

Project Manager: Balazs Hansel



Subject Area

REGIONAL LOCATION
Former Inwards Parcels Office
Prepared on Behalf of Atlassian Pty Ltd

Figure 1 – Regional Location



GDA 1994 MGA Zone 56

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Project No: P0020770

Project Manager: Balazs Hansel

■ Subject Area
 — Contours
 ■ Hydrology

LOCATION OF THE SUBJECT AREA
 Former Inwards Parcels Office
 Prepared on Behalf of Atlassian Pty Ltd

Figure 2 – Location of the Subject Area (The Site)

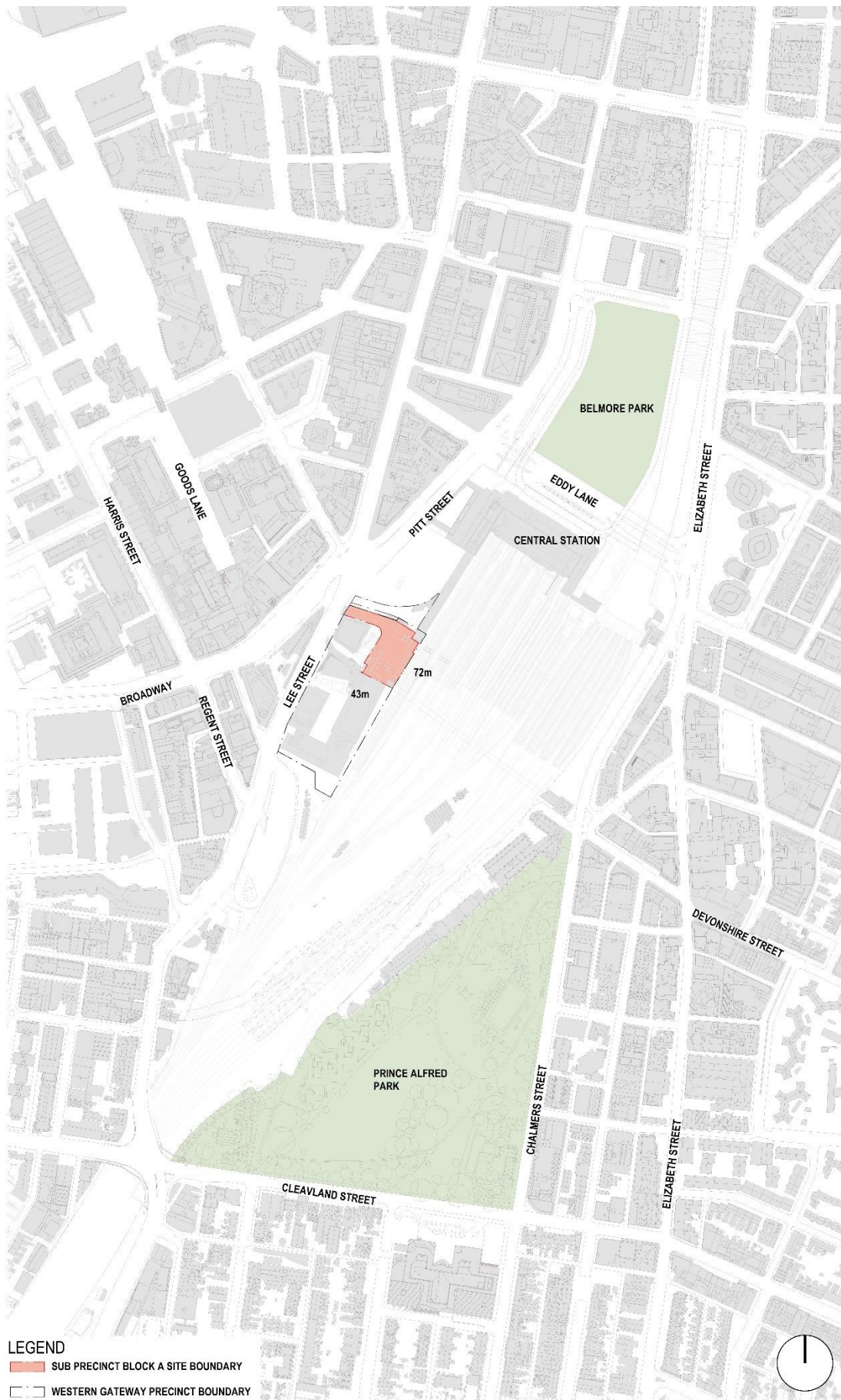


Figure 3 – Subject Area (The Site) location and dimensions

Source: BVN / SHoP

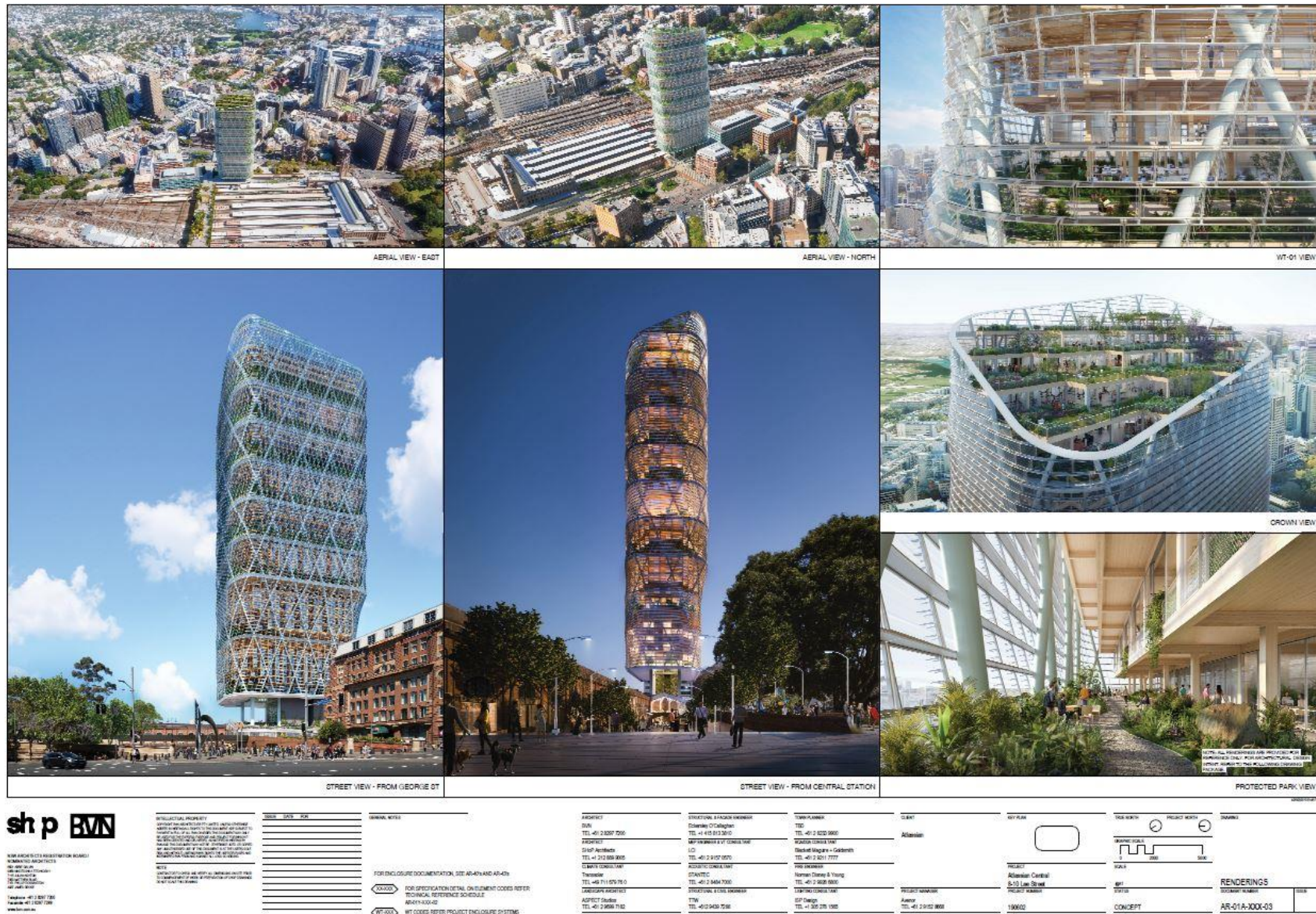


Figure 4 – Proposed Development (Source: BVN Architecture)

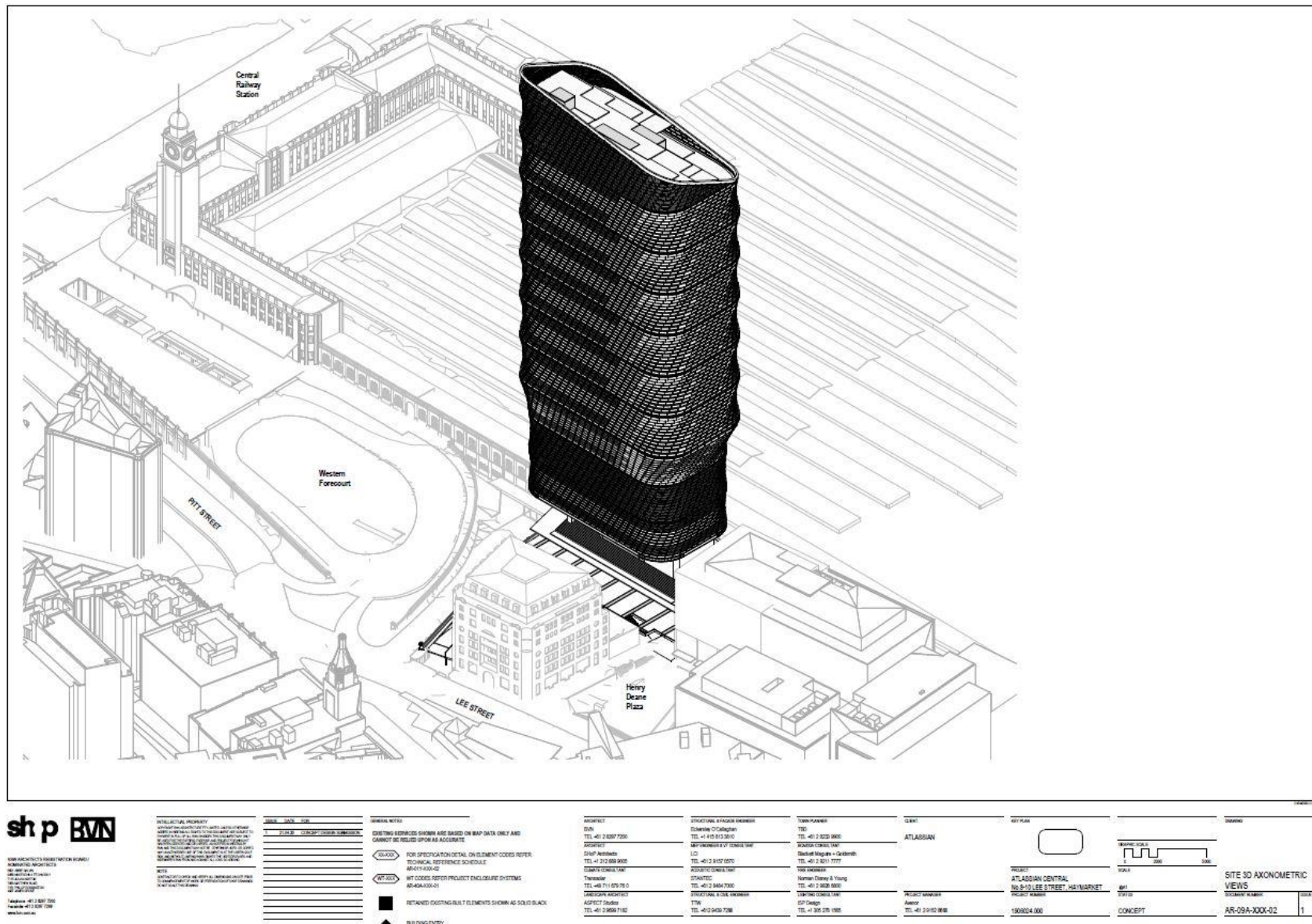


Figure 5 – Proposed Development (Source: BVN Architecture)

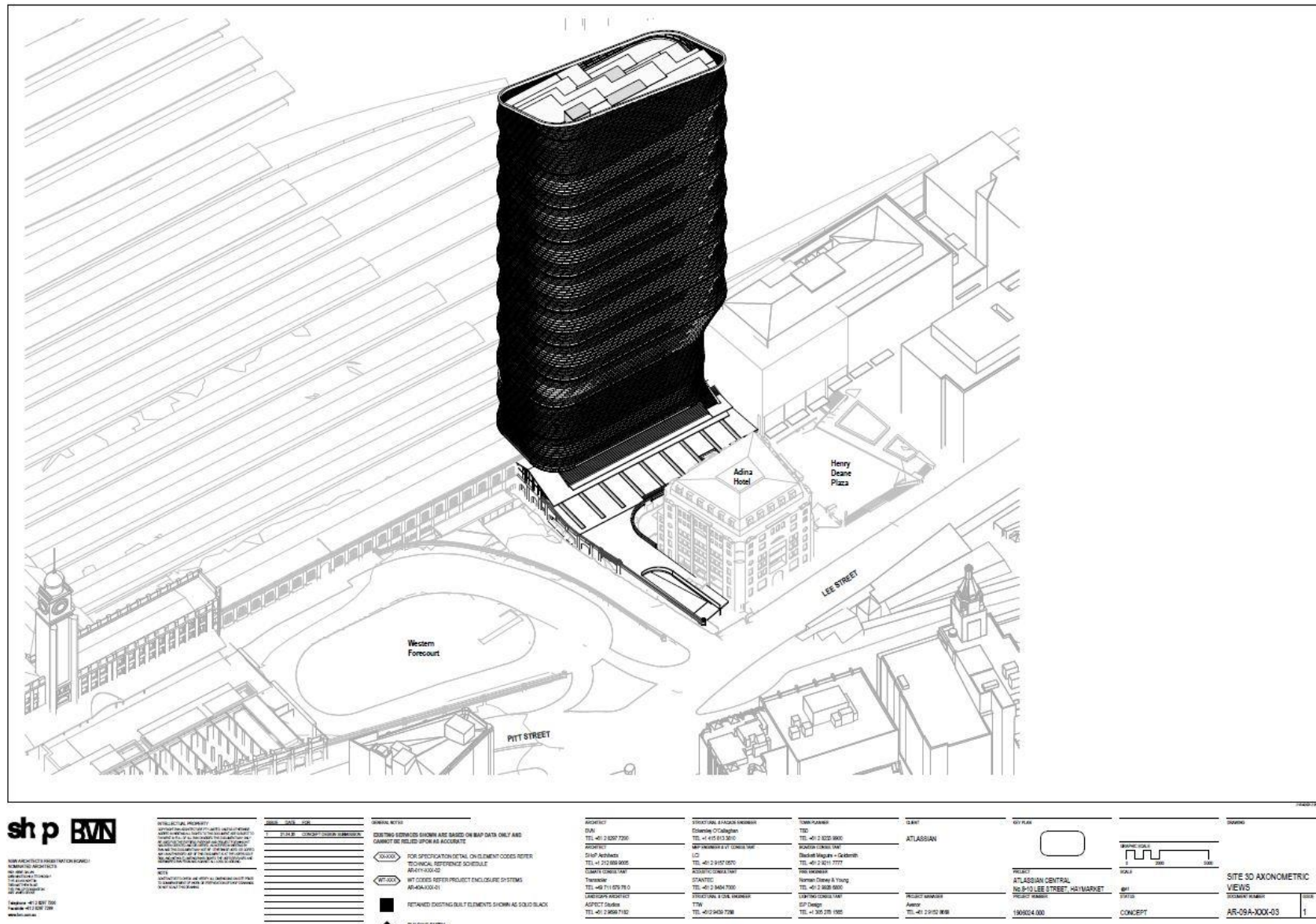


Figure 6 – Proposed Development (Source: BVN Architecture)

2. ARCHAEOLOGICAL CONTEXT

2.1. LOCATION

The study area is located within Lot 116 DP1078271, Lot 117 DP1078271, Lot 118 DP1078271 and Lot 13 DP1062447 at 8-10 Lee Street, Sydney within Railway Square. The subject area is within the City of Sydney Council LGA. The subject area is within the Western Gateway Sub-precinct of the Central Precinct State Significant Precinct (Central SSP), which was designated in July 2019.

The subject area covers approximately 3700m² and is bound by Ambulance Avenue to the north, Lee Street to the west, Henry Deane Plaza to the south and Central Station CountryLink platforms to the east. The subject area is currently owned by Transport for NSW and is occupied by YHA Australia Ltd. The upper level of the Former Inwards Parcels Office is occupied by the Sydney Central YHA while the lower level contains workshops associated with CountryLink services, waste disposal and amenities.

2.2. ABORIGINAL ARCHAEOLOGICAL BACKGROUND

This section comprises the summary of the archaeological background research for Aboriginal cultural heritage resources. This includes the search of the Aboriginal Heritage Information Management System (AHIMS), previous archaeological investigations pertinent to the subject area and landscape analysis.

2.2.1. Aboriginal Heritage Information Management System

The AHIMS database comprises previously registered Aboriginal archaeological objects and cultural heritage places in NSW and it is managed by the Department of Planning, Industry and Environment (DPIE) under Section 90Q of the *National Parks and Wildlife Act 1974* (NPW Act).

The Extensive search of the AHIMS was carried out on the 17th February 2020 (Client Service ID: 484505) for an area of approximately 4km by 4km.

Altogether 78 Aboriginal objects and no Aboriginal places were identified within the Extensive AHIMS search area. The search found no registered Aboriginal objects within or adjacent to the subject area.

Aboriginal objects are the official terminology in AHIMS for Aboriginal archaeological sites. From this point in the assessment forward the terms of 'Aboriginal sites', 'AHIMS sites' or 'sites' will be used to describe the nature and spatial distribution of archaeological resources in relation to the subject area.

Of the 78 sites identified, five were subsequently noted to be 'not a site' on their site cards and have been excluded from the analysis.

The search results are discussed in Table 3 and included as Appendix A.

Table 3 – AHIMS search results (Client Service ID: 484505)

Site Type	Context	Number	Percentage
Potential Archaeological Deposits (PAD)	Open	23	31.5%
Midden	Open	11	15.1%
Artefact Scatter	Open	7	9.6%
Isolated Find	Open	4	5.5%
Rock Engraving	Open	4	5.5%
Artefact Scatter with PAD	Open	3	4.1%
Shelter with Midden	Closed	3	4.1%
hearth	Open	2	2.7%
Modified Tree	Open	2	2.7%

Site Type	Context	Number	Percentage
Aboriginal Gathering (Tent Embassy)	Open	1	1.4%
Artefact Scatter	Open	1	1.4%
Artefact Scatter with Non-Human bone	Open	1	1.4%
Burial and Historic place	Open	1	1.4%
Grinding Groove	Open	1	1.4%
Midden with Artefact	Open	1	1.4%
Midden with Artefact and ceramic	Open	1	1.4%
Midden with Artefact and PAD	Open	1	1.4%
Midden with Contact site	Open	1	1.4%
Shelter with Art	Closed	1	1.4%
Shelter with Art and Artefact	Closed	1	1.4%
Shelter with midden and art	Closed	1	1.4%
Shelter with PAD	Closed	1	1.4%
Water Hole	Open	1	1.4%
Total	N/A	73	100

The closest registered sites to the subject area are listed below:

- AHIMS ID#45-6-3654 is an artefact scatter identified during the Central Station Metro works. The artefacts associated with this scatter were identified in intact Botany sands in the Tuggerah Soil Landscape, below platforms 13-15 approximately 140m east of the subject area. The site card provides scarce information as the excavations were still ongoing at time of submission. However due to the works undertaken on site for the metro project, which have involved bulk excavation of the sands to cultural sterility, this site has likely been destroyed.
- AHIMS ID#45-6-2987 is an isolated find that was recovered from spoil removed from a post hole during an historical archaeological excavation at a construction site approximately 230m north west of the subject area. The artefact is a medial fragment of a large flake with retouch on all four edges. The site card identified that the artefact was believed to be redeposited in the 19th century or later during construction works, and that they intended to obtain an AHIP. The site was destroyed under AHIP 3506.

The types of sites identified reflect the landscape and environment of the search area. Generally open sites dominated the search results. Open sites comprised 90% (n=66) of site types identified, with closed sites comprising 10% (n=7).

Spatially, Aboriginal sites registered within the search area tend to be located around the coastline or in areas of high development. This is further reflected in the types of sites present. Site including PADs comprised 38% (n=28) of search results. PADs occur where there are intact natural soil profiles with the potential to retain archaeological materials. PADs are often registered in highly developed urban regions where any natural soil is encountered, owing to the high disturbance which occurred prior to the development of legislation protecting Aboriginal sites. The high percentage of registered PADs within the search area attests to the influence of disturbance and the potential that intact natural soils present in areas of high disturbance.

Sites with artefacts comprised 27% (n=20) of the search results. It is important to acknowledge that a number of these sites are high in density sites (including AHIMS ID#45-6-3245 and AHIMS ID#45-6-3246). Artefacts generally attest to use, habitation and occupation of areas by Aboriginal people prior or post settlement.

Middens in both open and closed contexts, with or without associated materials, comprised 26% (n=19) of identified site types. Due to the nature of these sites, being comprised primarily of shell material or edible marine/estuarine species, they occur along coastlines or drainage lines.

The Hawkesbury sandstone which dominates The Rocks and Sydney coastal areas also impacts the type of sites present, with shelter and art/engraving sites depending on outcrops of sandstone. Sites reliant on sandstone comprised 16% (n=12) of site types identified within the search.



GDA 1994 MGA Zone 56

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Project No: P0020770
Project Manager: Balazs Hansel

Registered AHIMS Sites

Former Inwards Parcels Office
Prepared on Behalf of Atlassian Pty Ltd

- | | | | | |
|---|--|--|--|--|
| Subject Area | ● Aboriginal Gathering (Tent Embassy) | ● Isolated Find | ● Not a site | ● Shelter with Art |
| — Contours | ● Artefact Scatter | ● Midden | ● PAD | ● Shelter with PAD |
| — Hydrology | ● Artefact Scatter with PAD | ● Midden with Artefact and PAD | ● Rock Engraving | ● Shell Midden |
| - - - Ephemeral | ● Burial and Historic place | ● NOT A SITE | | |

Figure 9 – Registered AHIMS sites in the vicinity of the Subject Area

2.2.2. Regional Archaeological Context

Previous archaeological assessments across the Cumberland Plain and of significance to this assessment, the Sydney Central Business District, provide important data on Aboriginal archaeological site distribution and typology. An understanding of the archaeological landscape within the subject area can be developed from this analysis.

Aboriginal occupation in the Sydney region encompasses at least 20,000 years with dates of 13,000 before present (BP) at Shaws Creek in the Blue Mountain foothills; 11,000 BP for Mangrove Creek and Loggers Shelter and c. 20,000 BP at Burrill Lake on the NSW South Coast (Attenbrow 2002). The majority of sites in the Sydney region have been dated to within the last 3,000 to 5,000 years, with many researchers proposing that occupation intensity increased during this period. This apparent intensity of occupation may have been influenced by rising sea levels. By about 6,500 BP, seas had risen to their present levels. Radiocarbon dating of charcoal samples from sand sheet contexts in proximity to the Cooks River have indicated occupation to the late Pleistocene (McDonald 2005). Older occupation sites along the now submerged coastline would have been flooded, with subsequent occupation concentrating and utilising resources along the current coastlines and changing ecological systems in the hinterland and the Cumberland Plain (Attenbrow 2002).

These sites provide evidence that Aboriginal people were occupying this portion of Sydney prior to the arrival of the First Fleet in 1788. They also demonstrate this evidence continues to exist in some urban sites which contain remnant portions of the original soil profile. Based on these results, it is possible that similar evidence of Aboriginal occupation will also be present within original and/or intact topsoils throughout Sydney's Central Business District.

2.2.3. Local Archaeological Context

The subject area has been assessed by one previous Aboriginal archaeological assessment. This is discussed below.

The immediate and wider surroundings of the subject area have experienced various investigations. Brief summary and analysis of these reports are provided in Table 4 below.

Artefact Heritage, 2018. Former Inwards Parcel Shed, Central Station. Aboriginal Heritage Due Diligence and Non-Aboriginal (Historic) Archaeological Assessment

In 2018, Artefact Heritage was engaged by Atlasian to prepare an archaeological assessment and Aboriginal heritage due diligence assessment for the current subject area (the Former Inwards Parcels Office). This assessment determined that the subject area had been subject to significant ground disturbance post-European settlement.

The Artefact assessment (2018) maintained that while the subject area was originally located within the 'sand hills' on the outskirts of the early colony, the expansion of the colony and establishment of the Benevolent Asylum had resulted in widespread landscape modification across the area. The third Central Station involved deep ground excavation for the construction of the Inwards Parcels Office basement and tunnels. Artefact argued that this ground disturbance would likely have removed any intact original soil surfaces within the study area. Artefact (2018) argued that this was supported by excavations conducted in 2009 by Casey & Lowe approximately 25 metres to the north of the subject area which identified that European demolition layers overlaid sterile deposits of natural Botany sands.

Artefact surmised that due to the high level of disturbance, apparent depth of impacts associated with the Inwards Parcels Office and the third Central Station and the location of the subject area on the western edge of the Botany sand sheet, it is unlikely that earlier sand deposits would be located beneath current structures within the subject area. Artefact concluded that the subject area contained nil archaeological potential for Aboriginal cultural materials and recommended an unexpected finds policy be implemented.

Table 4 – Summary of previous Aboriginal archaeological assessments in the Sydney Central Business District

Report	Summary	Analysis	Key learnings
1985, R. J. Lampert. Marty Bond Store.	Archaeological excavation report for midden site, AHIMS ID#45-6-0519. This midden was located below the Marty Bond Store, beneath part of the rubble floor. Flaked stone was identified in a lens of dark brown, compact sand. Ceramic pieces were also identified within the midden on level 6, suggesting that Aboriginal use of the midden continued into the historic period. This excavation resulted in the identification of 392 stone artefacts within the midden.	<ul style="list-style-type: none"> Early example of archaeological investigation revealing an extensive Aboriginal archaeological resource within the context of a moderate-highly disturbed urban area. 	<ul style="list-style-type: none"> It is considered unlikely that middens will occur within the subject area on the basis of the landscape features present.
1990, V. Attenbrow. Port Jackson Stage 1.	<p>Attenbrow provided a method for the distinguishing between midden and middens with stone artefacts – where shell is the dominant material, sites were recorded as middens. Where stone artefacts outnumbered visible shell, the site was recorded as having archaeological deposit.</p> <p>In general, Attenbrow established an in-depth system for the recording of Aboriginal sites, in particular middens and artefact scatters, and processes for distinguishing the number of sites. This assessment established an early standard for the detailed archaeological recording of Aboriginal sites in the Sydney basin context.</p> <p>Attenbrow's assessment resulted in the correct recording of 369 sites with midden or deposit within the Port Jackson Catchment. 126 of these are open middens, 203 are middens in rock shelters, 6 are open middens with small shelters, 27 are deposits in shelters and 7 are open deposits.</p>	<ul style="list-style-type: none"> Provided a clear and detailed analysis of the Port Jackson Catchment Area and Aboriginal archaeological sites within. Established criteria for the recording of Aboriginal sites, differentiating between archaeological sites and natural deposits and delineating sites from one another (i.e.: midden materials separated by a naturally occurring drainage line are identified as two separate middens) 	<ul style="list-style-type: none"> It is considered unlikely that middens will occur within the subject area on the basis of the landscape features present.

Report	Summary	Analysis	Key learnings
Attenbrow, 1990. The Port Jackson Archaeological Project: Preliminary Report on Stage 2.	Stage 2 of the Port Jackson Archaeological Project involved the excavation of a selection of sites across the study area. Test excavation was undertaken at two rock shelters with middens – AHIMS ID# 45-6-0560 and AHIMS ID# 45-6-1045. Materials excavated from the deposit at AHIMS ID# 45-6-0560 included shell, stone artefacts, animal bones and human skeletal material. Materials excavated from AHIMS ID# 45-6-1045 included primarily shell with one stone artefact and modern refuse including rusted metals.	<ul style="list-style-type: none"> • Example of test excavation within rock shelters and middens within the Sydney Basin. • Potential example of contact site as a result of European material found within an Aboriginal archaeological context. 	<ul style="list-style-type: none"> • Based on the Port Jackson Archaeological Project it can be extrapolated that there is potential for contact archaeological sites to occur within the Sydney CBD and by extraction the current subject area.
Godden Mackay Heritage Consultants, 1997. Angel Place Final Excavation Report.	Salvage excavation report for the excavation of AHIMS ID#45-5-2581, an open camp site identified adjacent to the central Sydney Tank Stream. This was undertaken through a consent to destroy permit. The salvage excavation identified fifty-four flaked stone artefacts within the area. GML identified that the site was the first to be located in the Tank Stream easement, however they concluded that this was due to the high amount of disturbance post-settlement in this area of Sydney and, further, that the distribution of artefacts recovered suggests a contiguous distribution of lithics on the banks of the tank stream, from continuous or repetitive periods of occupation.	<ul style="list-style-type: none"> • Disturbed urban environment located in close proximity to major water source. • Results suggesting that disturbance may not necessarily entirely remove the potential for Aboriginal objects to be recovered from what would have been originally a high potential landform but may impact density. 	<ul style="list-style-type: none"> • Despite the level of historical disturbance within the current subject area previous studies such as GMHC 1997 show that archaeological potential still remains within developed urban areas.
Dominic Steele Consulting Archaeology, 2002. Salvage Excavation Potential Aboriginal Site, 589-593	<p>Salvage excavation report for a potential midden site, AHIMS ID# 45-6-2637. This site was identified during historic archaeological excavations for a range of 19th century terraces that documented the early European occupation of 'Brickfield Hill'.</p> <p>The potential site was described as a thin band of shell that was present below European deposits. No associated Aboriginal archaeological features were found with the shell</p>	<ul style="list-style-type: none"> • Provides methodology for determining origin of midden sites. • Concluded lack of Aboriginal objects suggests non-Aboriginal origin for shell deposit. 	<ul style="list-style-type: none"> • It is considered unlikely that middens will occur within the subject area on the basis of the landscape features present.

Report	Summary	Analysis	Key learnings
George Street, Sydney.	and it was determined that the shells related to the European use of the site, with the shells representing mortar practices.		
Dominic Steele Consulting Archaeology, 2002. Aboriginal Archaeological Assessment Report, the KENS Site	<p>Aboriginal archaeological assessment report evaluating the likelihood for Aboriginal archaeological deposits to be present within Kent, Erskine, Napoleon and Sussex Streets (KENS site), where heavy development had taken place post-settlement.</p> <p>The development included 19th century terraces, hotels, garages, and a multi-storey carpark, as well as vacant lots and a section of the Western Distributor. The assessment concluded that the area would likely have been utilised by Aboriginal people prior to European occupation, however, European occupation may limit the potential for intact Aboriginal materials to be located on the surface. DSCA suggested that below imported fill associated with this occupation and development, subsurface evidence of Aboriginal utilisation of the area may occur.</p>	<ul style="list-style-type: none"> • Similar highly developed urban environment to the current subject area. • Suggests that while disturbance may impact the likelihood for Aboriginal archaeological materials to survive on the surface <i>in situ</i> deposits may remain below imported fill in areas where soil has not been completely removed. 	<ul style="list-style-type: none"> • Aboriginal archaeological deposits may still remain within the subject area despite level of historical disturbance.
Dominic Steele Consulting Archaeology, 2006. Aboriginal Archaeological Excavation Report, The KENS Site.	Archaeological Assessment for KENS sites discussed above, involving excavation. These excavations were primarily focused at identifying European archaeological materials. A subsurface stone artefact assemblage was recovered during excavation despite high levels of disturbance associated with post-settlement development including 19 th century terraces, hotels, garages, and a multi-storey carpark, as well as vacant lots and a section of the Western Distributor. The lithics were identified in an area to the north east below the basement floor level in an area of remnant natural soil. The stratigraphic record of the site identified that natural soil profiles were truncated and rapidly buried in the subject site in the early days of development.	<ul style="list-style-type: none"> • Similar highly developed urban environment to the current subject area. • Supports the suggestion that disturbance does impact potential, but that remnant natural soil in highly disturbed environments retains archaeological potential. 	<ul style="list-style-type: none"> • Aboriginal archaeological deposits may still remain within the subject area despite level of historical disturbance.

Report	Summary	Analysis	Key learnings
Biosis, 2012. The Quay Project, Haymarket: Aboriginal Cultural Heritage Assessment Final Report	<p>Aboriginal Cultural Heritage Assessment resulting from the identification of intact natural soil during historical archaeological salvage excavations.</p> <p>Biosis concluded that significant and extensive modification of the landscape since the late 18th Century would likely have removed all traces of Aboriginal occupation through the removal of the soil profile. During historic excavations, remnant deposits of natural soil were encountered triggering the need for further Aboriginal archaeological assessment. No artefacts were identified within the remnant soils during test excavation.</p> <p>During historical salvage excavation of a European post hole, a single lithic artefact was identified. This was clearly in a disturbed context and did not change the conclusion that the archaeological potential of the site was considered to be low with the artefact determined to be of low significance.</p>	<ul style="list-style-type: none"> • In close proximity to the current subject area. • Intact natural soil may remain even in urban, highly developed areas. • Aboriginal objects may occur in areas of high disturbance, however, this disturbance will likely impact on the associated significance. • The presence of natural soils does not necessarily indicate the presence of Aboriginal objects, however, it does identify a need for further investigation. 	<ul style="list-style-type: none"> • Aboriginal archaeological deposits may still remain within the subject area despite level of historical disturbance.
Biosis, 2012. 445-473 Wattle St, Ultimo: Proposed Student Accommodation Development, Aboriginal Cultural Heritage Assessment Report.	<p>Aboriginal Cultural Heritage Assessment in relation to the potential for Aboriginal objects or areas of sensitivity in Ultimo.</p> <p>Disturbance across the subject site included single-storey brick commercial buildings as well as concreting and asphaltting, all of which reduced ground surface visibility during the field survey.</p> <p>Biosis argued that, despite the development on the site, it was likely that deep portions of alluvial soils would be retained across the area beneath European fill and that these soils, at a depth of approximately 7m, would have moderate-high archaeological potential due to the other landscape features present (namely the proximity of Blackwattle Creek).</p>	<ul style="list-style-type: none"> • In proximity to the subject area. • Similar urban environment to the subject area. • Suggests artefact bearing soils may still be present at great depth despite the presence of development and imported fill. 	<ul style="list-style-type: none"> • Aboriginal archaeological deposits may still remain within the subject area despite level of historical disturbance.

Report	Summary	Analysis	Key learnings
2014, GML. George Street.	<p>Report for Aboriginal test excavation undertaken on an area of identified PAD at 200 George Street. This assessment was triggered by the identification of natural soils during historical archaeological investigations. No Aboriginal objects or sites were identified during test excavation. This is attributed to the pre-colonisation landscape and environmental conditions being unsuitable for Aboriginal occupation in this area.</p>	<ul style="list-style-type: none"> • Intact natural soil may remain even in urban, highly developed areas. • The presence of natural soils does not necessarily indicate the presence of Aboriginal objects, however, it does identify a need for further investigation. • Landscape and environmental factors play a decisive role in determinations of archaeological potential. 	<ul style="list-style-type: none"> • Intact natural soil may remain within the subject area.
2006, GML. <i>Randwick Racecourse Conservation Management Plan.</i>	<p>The Randwick Racecourse CMP analysed the significance of the Randwick Racecourse lands, and the constraints and opportunities going forward.</p> <p>Regarding Aboriginal archaeological potential, GML identified the landscape as restrictive for Aboriginal settlement, due to the swamps. They acknowledge it is likely that the area was utilised for resource gathering. The CMP identifies the majority of the racecourse as having low Aboriginal archaeological sensitivity, excluding the southeast sandhills which were assessed as having high Aboriginal archaeological sensitivity.</p> <p>The CMP acknowledged that the original landscape of the Randwick region was inaccessible, with few roads or tracks (GML, 2006 pg. 12). However, this is based off European utilisation of the land, where roads and tracks were necessary. Local Aboriginal groups were likely familiar with the terrain and not as reliant on the existence of tracks and paths to make their way through the region. Furthermore, the</p>	<ul style="list-style-type: none"> • The sandhills that once occurred across the eastern suburbs would have been utilised by Aboriginal communities for resource gathering. • Preliminary conclusions made by the Randwick Racecourse CMP stated that the remnant eastern sandhills within the racecourse subject area presented high archaeological potential 	<ul style="list-style-type: none"> • The Tuggerah Soil Landscape within the subject area presents moderate archaeological potential.

Report	Summary	Analysis	Key learnings
	<p>CMP argued that the swampland nature of the Randwick Racecourse area would have likely made it uninhabitable, while neglecting the fact that the abundant resources would have positioned the area as a favourable location for camps on the banks of the swamps.</p> <p>More recent archaeological research in the immediate vicinity of Randwick Racecourse has resulted in the identification of high-density artefact scatters (see GML, 2015).</p>		
2015, GML. <i>CBD and South East Light Rail. Aboriginal Cultural Heritage Assessment and Aboriginal Technical Report</i>	<p>Aboriginal cultural heritage and archaeological assessment for the CBD and South East Light Rail. The assessment determined the whole Moore Park precinct to contain a high level of Aboriginal archaeological potential for dispersed, low frequency sites, given the existence of sand dune systems.</p> <p>As a consequence of non-focused long-term low-density Aboriginal occupation of the entire dune system, moderate historic period impacts and limited archaeological investigations in the surrounding area, no specific Aboriginal archaeological patterning can be determined for the Randwick precinct. However, deeper intact soil profiles may have potential for Aboriginal archaeological evidence to be present, such as stone objects and/or hearths. Organic remains such as middens or burials may be present, if environmental conditions permit—for example, if pH is close to neutral, if there are very desiccated conditions or, conversely, if there are low fluvial but anaerobic and waterlogged conditions.</p> <p>As a result of the GML assessment the whole Randwick precinct is assumed to have some level of Aboriginal archaeological potential.</p>	<ul style="list-style-type: none"> Where present, sites in the extensive sand dunes can be anticipated to be small in extent but high in level of integrity and condition Sand dunes have archaeological potential owing to Aboriginal utilisation over the past 10,000 years with remnant evidence including hearths and stone artefact sites. Identified sites may be of high significance both culturally and scientifically, representing Aboriginal adaptation of European materials 	<ul style="list-style-type: none"> The Tuggerah Soil Landscape within the subject area presents moderate archaeological potential.

Report	Summary	Analysis	Key learnings
<p>2016 – ongoing, GML. RSY 1 Archaeological Technical Report. Unpublished and currently unavailable.</p> <p>and</p> <p>2017, GML. <i>4-18 Doncaster Avenue, Kensington, Aboriginal Cultural Heritage Assessment Report</i></p>	<p>The following information has been sourced from the GML website, a phone conversation with Tim Owen (Principal Archaeologist, GML, 27 August 2019) and the <i>4-18 Doncaster Avenue, Kensington Aboriginal Cultural Heritage Assessment Report</i> (GML 2017).</p> <p>GML undertook an Aboriginal Cultural Heritage Assessment for 4-18 Doncaster Avenue, approximately 3.15 km southeast of the current subject area. This study resulted in the identification of one site, Doncaster Avenue PAD (AHIMS #45-6-3245). The Doncaster Avenue investigation was undertaken after the archaeological investigation of the stone artefact site RSY1 (AHIMS #45-6-3246) located partially within and to the southeast of the Doncaster Avenue subject area. Recommendation for salvage excavation under AHIP #C0003723 was made, which had provisions for the protection of artefacts associated with RSY1 and includes a dedicated no harm area around this site.</p> <p>GML is currently in the process of finalising the Archaeological Technical Report regarding the test/salvage excavation of site RSY 1 (AHIMS #45-6-3246).</p> <p>Urbis' current understanding of the Aboriginal archaeological excavations at RSY 1 is that they were conducted as part of the development for the Sydney Light Rail Project. Initial test excavations found that the southern half of the development area was highly disturbed; being composed of deeply stratified deposits made from locally derived fill materials, but which had been historically displaced. However, the northern half of the development area, beneath a unit of historical fill, was found to be composed of intact sand dune profiles with a partially truncated surface horizon. The surface horizon was characteristically dark as a result of the presence of</p>	<ul style="list-style-type: none"> Identified the high archaeological potential of sand dune complexes to contain archaeological material of significant age at depth. In discussing the Randwick Racecourse in general, this report identifies the high potential for archaeological evidence to survive deep in sand dune contexts and be of significant age. They also acknowledge that sand bodies contain potential to contain burials, generally between 0.5-2m in depth in proximity to bays and harbours. A detailed geomorphological understanding and investigation of sand dune landforms is required to determine the presence of remnant dune topsoil and/or archaeological deposits 	<ul style="list-style-type: none"> A detailed geomorphological investigation within the subject area may allow the detection of remnant dune topsoil and/or archaeological deposits. The Tuggerah Soil Landscape within the subject area presents moderate archaeological potential.

Report	Summary	Analysis	Key learnings
	<p>decomposed organic materials. RSY 1 was identified within the truncated but intact dune surface horizon.</p> <p>The depth of the stratified deposit at RSY 1 exceeding 4 m in portions of the site. When the depth of the deposit was combined with the fragility of the sand substrate it was determined by GML that standard archaeological methods were untenable due to safety concerns (section collapse etc). It was stated by GML that 'the fragility of the substrate would have benefitted from a single-stage excavation approach' (GML 2017 p.17).</p> <p>GML developed a geomorphological model of the RSY 1 site based on the field investigation and with reference to available geological literature. The model stated that:</p> <p>'Aeolian sands had accreted through the Pleistocene and into the Holocene forming longitudinal dunes with local topographic peaks and troughs. After cessation of aeolian accretion sometime in the Holocene, Aboriginal objects became concentrated at the surface of the dune landform. During subsequent development of the area by British colonists the dune topography was levelled by displacement of dune peaks into the troughs. Some pre-European ground surfaces would therefore have been preserved by this procedure including some lower dune peaks' (GML 2017 p.17-18).</p> <p>The boundary of RSY 1 was characterised by GML through extensive geomorphological/archaeological work and extrapolated into the Doncaster Avenue study area. RSY 1 is characterised as a discrete deposit, which does not spread across the wider landscape. As such, any further Aboriginal objects, that may have been identified within the Doncaster</p>		

Report	Summary	Analysis	Key learnings
	<p>PAD, were likely to be representative of separate deposition events to that which resulted in the formation of RSY 1.</p> <p>At RSY 1 Aboriginal objects were identified in an ancient sandy topsoil that represented the ground-surface after the aeolian accretion processes had stopped yet prior to European landscape modification. As the intact soil profile was so characteristic a strategy of borehole investigation was able to trace the profile across the Doncaster Avenue subject area. A methodology of mechanical removal of fill followed by 1 m² test pits was utilised to sample the upper dune layers. No further Aboriginal objects were identified through the subsequent test excavations.</p>		
Casey and Lowe, 2009, <i>Results of Archaeological Testing, Western Forecourt, Central Station</i>	<p>A report on historical archaeological test excavations conducted in the Western Forecourt Garden of Central Station, approximately 50-125m northwest of the subject area.</p> <p>Excavation in the southernmost trench found a layer of demolition material below the garden topsoil layer to a depth of 250-500 mm. The demolition material was assessed as being the remains of the Benevolent Asylum.</p> <p>Underlying the demolition layer was a natural sand layer of soft, pale grey bleached sand, reflecting the nineteenth-century description of the area as the "Sandhills".</p>	<ul style="list-style-type: none"> Sand forms the natural subsoil in close proximity to the subject area and has been identified at depth below demolition rubble/historical disturbance. This is consistent with the conclusion that the Tuggerah Soil Landscape extends to within the current subject area. 	<ul style="list-style-type: none"> Aboriginal archaeological deposits may still remain within the subject area despite level of historical disturbance.

2.2.4. Predictive Model

The *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* requires that an appropriate predictive model be used when undertaking an ACHA. A predictive model is used to estimate the nature and distribution of evidence of Aboriginal land use in a subject area. The results produced by a predictive model can be used to identify potential archaeological deposits (PADs).

A predictive model should consider variables that may influence the location, distribution and density of sites, features or artefacts within a subject area. Variables typically relate to the environment and topography, such as soils, landscape features, slope, landform and cultural resources. The following predictions for the subject area have been formulated on the basis of previous assessments, regional models and the AHIMS data provided in Section 2.2.1.

There are several site types which are known to occur within New South Wales. These site types and their likelihood to occur within the subject area are evaluated in Table 6 below.

The general process archaeologists employ to determine the likelihood of any particular site type (artefact scatter, shelter, midden etc) to occur within a given subject area requires the synthesises of information for general distribution of archaeological sites within the wider area including:

- Detailed analysis of previous archaeological investigations within the same Region,
- Presence or absence of landscape features that present potential for archaeological resources (human occupation, use) such as raised terraces adjacent to permeant water,
- Analysis of the geology and soil landscape within the subject area which allows for a determination to be made of the type of raw material that would have been available for artefact production (silcrete, tuff, quartz etc) and the potential for the accumulation of archaeological resource within the subject area,
- Investigation of and determination of the level of disturbance/historical land use within the subject area which may impact on or remove entirely any potential archaeological material.

The combination of these would give us an indication of various levels of possibility of finding archaeological resource within a given area. Please refer to Table 5 below for an example of the indicative process of determining the likelihood of a given site occurring within a subject area.

Table 5 – Indicative process of determining the likelihood of a given site occurring within a subject area

Likelihood	Indicative subject area context	Indicative action
High	Low level of disturbance, presence of one or more archaeologically sensitive landforms (raised terrace adjacent to permanent water, sand dunes, rock shelter etc), presence of archaeologically sensitive soil landscape (Tuggerah, Blacktown, South Creek etc), presence of previously recorded archaeological site(s) and/or identification of previously unrecorded archaeological site(s) within the subject area	Detailed archaeological investigation including but not limited to survey, test excavation and potentially (depending on density and/or significance of archaeological deposit) salvage excavation.
Moderate	Moderate level of disturbance, presence of one or more archaeologically sensitive landforms (raised terrace adjacent to permanent water, sand dunes, rock shelter etc), presence of archaeologically sensitive soil landscape (Tuggerah, Blacktown, South Creek etc), presence of previously recorded archaeological site(s) and/or identification of previously unrecorded archaeological site(s) within the subject area	Detailed archaeological investigation including but not limited to survey, test excavation and potentially (depending on density and/or significance of archaeological deposit) salvage excavation.

Likelihood	Indicative subject area context	Indicative action
Low	High level of disturbance, presence of one archaeologically sensitive landforms (raised terrace adjacent to permanent water, sand dunes, rock shelter etc), presence of archaeologically sensitive soil landscape (Tuggerah, Blacktown, South Creek etc).	Employ chance finds procedure and works can continue without further archaeological investigation.
Nil	Complete disturbance, complete removal of natural soil landscape, zero archaeologically sensitive landform, geological or soil features. Zero previously recorded archaeological sites.	Employ chance finds procedure and works can continue without further archaeological investigation.

Table 6 – Predictive Model

Site Type	Description	Likelihood	Justification
Artefact Scatters	Artefact scatters represent past Aboriginal subsistence and stone knapping activities and include archaeological remains such as stone artefacts and hearths. This site type usually appears as surface scatters of stone artefacts in areas where vegetation is limited, and ground surface visibility increases. Such scatters of artefacts are also often exposed by erosion, agricultural events such as ploughing, and the creation of informal, unsealed vehicle access tracks and walking paths. These types of sites are often located on dry, relatively flat land along or adjacent to rivers and creeks. Camp sites containing surface or subsurface deposit from repeated or continued occupation are more likely to occur on elevated ground near the most permanent, reliable water sources. Flat, open areas associated with creeks and their resource-rich surrounds would have offered ideal camping areas to the Aboriginal inhabitants of the local area.	Moderate	<ul style="list-style-type: none"> • High level of disturbance may impact on the integrity any archaeological material present. • The potential for Tuggerah Sands to occur within the subject area increases the potential for artefact deposits to occur, despite disturbance.
Isolated Finds	<p>Isolated finds represent artefactual material in singular, one off occurrences. Isolated finds are generally indicative of stone tool production, although can also include contact sites.</p> <p>Isolated finds may represent a single item discard event or be the result of limited stone knapping activity. The presence of such isolated artefacts may indicate the presence of a more extensive, in situ buried archaeological deposit, or a larger deposit obscured by low ground visibility. Isolated artefacts are likely to be located on landforms associated with past Aboriginal activities, such as ridgelines that would have provided ease of movement through the area, and level areas with access to water, particularly creeks and rivers.</p>	Moderate	<ul style="list-style-type: none"> • High level of disturbance may impact on the integrity any archaeological material present. • The potential for Tuggerah Sands to occur within the subject area increases the potential for artefact deposits to occur, despite disturbance.
PAD	Potential Archaeological Deposits (or PADs) are areas where there is no surface expression of stone artefacts, but due to a landscape feature there is a strong likelihood that the area will contain buried deposits of stone artefacts. Landscape features which may feature in PADs include proximity to waterways, particularly terraces and flats near 3rd order streams and above; ridge lines, ridge tops and sand dune systems.	Moderate	<ul style="list-style-type: none"> • High level of disturbance may impact on the integrity any archaeological material present. • The potential for Tuggerah Sands to occur within the subject area increases the potential for artefact deposits to occur, despite disturbance.

Site Type	Description	Likelihood	Justification
Scarred Trees	Tree bark was utilised by Aboriginal people for various purposes, including the construction of shelters (huts), canoes, paddles, shields, baskets and bowls, fishing lines, cloaks, torches and bedding, as well as being beaten into fibre for string bags or ornaments (sources cited in Attenbrow 2002: 113). The removal of bark exposes the heart wood of the tree, resulting in a scar. Trees may also have been scarred in order to gain access to food resources (e.g. cutting toe-holds so as to climb the tree and catch possums or birds), or to mark locations such as tribal territories. Such scars, when they occur, are typically described as scarred trees. These sites most often occur in areas with mature, remnant native vegetation. The locations of scarred trees often reflect an absence of historical clearance of vegetation rather than the actual pattern of scarred trees. Carved trees are different from scarred trees, and the carved designs may indicate totemic affiliation (Attenbrow 2002: 204); they may also have been carved for ceremonial purposes or as grave markers.	Nil	<ul style="list-style-type: none"> Absence of vegetation of a suitable age to bear cultural modification.
Axe Grinding Grooves	Grinding grooves are the physical evidence of tool making or food processing activities undertaken by Aboriginal people. The manual rubbing of stones against other stones creates grooves in the rock; these are usually found on flat areas of abrasive rock such as sandstone. They may be associated with creek beds, or water sources such as rock pools in creek beds and on platforms, as water enables wet-grinding to occur.	Nil	<ul style="list-style-type: none"> Absence of sandstone outcrops which were exposed prior to settlement.
Bora/Ceremonial	Aboriginal ceremonial sites are locations that have spiritual or ceremonial values to Aboriginal people. Aboriginal ceremonial sites may comprise natural landforms and, in some cases, will also have archaeological material. Bora grounds are a ceremonial site type, usually consisting of a cleared area around one or more raised earth circles, and often comprised of two circles of different sizes, connected by a pathway, and accompanied by ground drawings or mouldings of people, animals or deities, and geometrically carved designs on the surrounding trees.	Nil	<ul style="list-style-type: none"> High level of disturbance will have removed any ceremonial mounds.
Burial	Aboriginal burial of the dead often took place relatively close to camp site locations. This is due to the fact that most people tended to die in or close to camp (unless killed in warfare or hunting accidents), and it is difficult to move a body long distance.	Low	<ul style="list-style-type: none"> High level of disturbance likely to have removed any potential, however, the potential presence of Tuggerah Sands

Site Type	Description	Likelihood	Justification
	Soft, sandy soils on, or close to, rivers and creeks allowed for easier movement of earth for burial; and burials may also occur within rock shelters or middens. Aboriginal burial sites may be marked by stone cairns, carved trees or a natural landmark. Burial sites may also be identified through historic records or oral histories.		within the subject area does not completely remove all potential.
Contact site	These types of sites are most likely to occur in locations of Aboriginal and settler interaction, such as on the edge of pastoral properties or towns. Artefacts located at such sites may involve the use of introduced materials such as glass or ceramics by Aboriginal people or be sites of Aboriginal occupation in the historical period.	Low - Moderate	<ul style="list-style-type: none"> • High level of disturbance may impact on the integrity any archaeological material present. • The potential for Tuggerah Sands to occur within the subject area increases the potential for deposits to occur, despite disturbance. • The Benevolent Asylum within the subject area presents potential for contact sites.
Midden	Midden sites are indicative of Aboriginal habitation, subsistence and resource extraction. Midden sites are expressed through the occurrence of shell deposits of edible shell species often associated with dark, ashy soil and charcoal. Middens often occur in shelters, or in eroded or collapsed sand dunes. Middens occur along the coast or in proximity to waterways, where edible resources were extracted. Midden may represent a single meal or an accumulation over a long period of time involving many different activities. They are also often associated with other artefact types.	Low	<ul style="list-style-type: none"> • The potential for Tuggerah Sands to occur within the subject area increases the potential for midden deposits to occur, despite disturbance.
Art	Art sites can occur in the form of rock engravings or pigment on sandstone outcrops or within shelters (discussed below). An engraving is some form of image which has been pecked or carved into a rock surface. Engravings typically vary in size and nature, with small abstract geometric forms as well as anthropomorphic figures and animals also depicted (DECCW, 2010c). In the Sydney region engravings tend to be located on the tops of Hawkesbury Sandstone ridges where vistas occur. Pigment art is the result of the application of material to a stone to leave a distinct impression. Pigment types include ochre, charcoal and pipeclay. Pigment art within the Sydney region is usually located in areas associated with habitation and sustenance.	Nil	<ul style="list-style-type: none"> • Absence of sandstone outcrops which were exposed prior to settlement.

Site Type	Description	Likelihood	Justification
Shelters	Shelter sites are places of Aboriginal habitation. They take the form of rock overhangs which provided shelter and safety to Aboriginal people. Suitable overhangs must be large and wide enough to have accommodated people with low flooding risk. Due to the nature of these sites, with generic rock overhangs common particularly in areas with an abundance of sandstone, their use by Aboriginal people is generally confirmed through the correlation of other site types including middens, art, PAD and/or artefactual deposits.	Nil	<ul style="list-style-type: none"> Absence of sandstone outcrops which were exposed prior to settlement.

2.2.5. Summary of Previous Archaeological Investigations

The conclusions from the summary of the AHIMS results, previous reports and predictive modelling are the following:

- There are no Aboriginal sites registered within the subject area.
- Disturbance resulting from European occupation reduces the potential for intact soil profiles to remain within urban sites. In shallow soils profiles, this is likely to lower archaeological potential.
- Intact natural soils may be encountered in highly developed areas, below European fill. Where intact natural soils are encountered further assessment may be required to assess the archaeological potential. While intact natural soils may be present within urban environments, they may not necessarily contain Aboriginal archaeological objects as landscape factors play a decisive role in Aboriginal utilisation of the land prior to European occupation.
- Dominant site types within the region include artefact scatters and Potential Archaeological Deposit (PAD) sites.
- Despite the high level of disturbance within the subject area there remains the potential for Tuggerah Sands as well as a potential paleo channel to be located within the subject area. These features increase the potential for archaeological deposits (artefacts, middens, burials) to remain within the subject area below the current structures.

2.3. GEOLOGY AND SOILS

The subject area sits within the Sydney Basin bioregion and the only soil landscape mapped to occur within the subject area is the Blacktown (bt) Soil Landscape (see Figure 10). The geology associated with the Blacktown Soil Landscape includes Hawkesbury Sandstone bedrock, Ashfield shale and Quaternary sediments.

The Blacktown Soil Landscape is described as residing upon gently undulating rises on Wianamatta Group shales and Hawkesbury shale. Soils are described as shallow to moderately deep (<100 cm) Red and Brown Podzolic Soils (Dr3.21, Dr3.11, Db2.11) on crests, upper slopes and well-drained areas; deep (150-300 cm) Yellow Podzolic Soils and Soloths (Dy2.11, Dy3.11) on lower slopes and in areas of poor drainage.

The subject area is located to the west of the mapped Tuggerah Soil Landscape. The Tuggerah soil landscape is a dune system that exists within the Botany Lowlands and the coastline of the north eastern suburbs of Sydney. Soils are described as deep (>200 cm) podzols (Uc2.31, Uc2.32, Uc2.34) on dunes and podzols/humus podzol intergrades (Uc2.23, Uc2.21, Uc2.3, Uc4.33) on swales. Dominant soil materials include as loose speckled grey-brown loamy sand, bleached loose sand, grey-brown mottled sand, black soft sandy organic pan, brown soft sandy iron pan and yellow massive sand.

Prior to European settlement, the environment of the subject area was that of a fringe sand dune system. As identified in Section 2.2.3 above, excavations approximately 50m to the north of the subject area have revealed an underlying natural sand layer from a depth of around 250-500 mm, it is therefore to reasonably assume that the soil landscape within the subject area is likely to be that of the Tuggerah rather than Blacktown.

The Tuggerah Soil Landscape has the potential for Aboriginal objects both in surface and subsurface context. The spatial and stratigraphical integrity of natural soils is relevant to the potential for archaeological materials to be present. Within the subject area, disturbance levels are high resulting from the construction of the third Central Station and the Inwards Parcel Shed. Given the surface level disturbance within the subject area, it is unlikely that surface materials will be identified, but subsurface archaeological potential remains.

2.4. VEGETATION AND RESOURCES

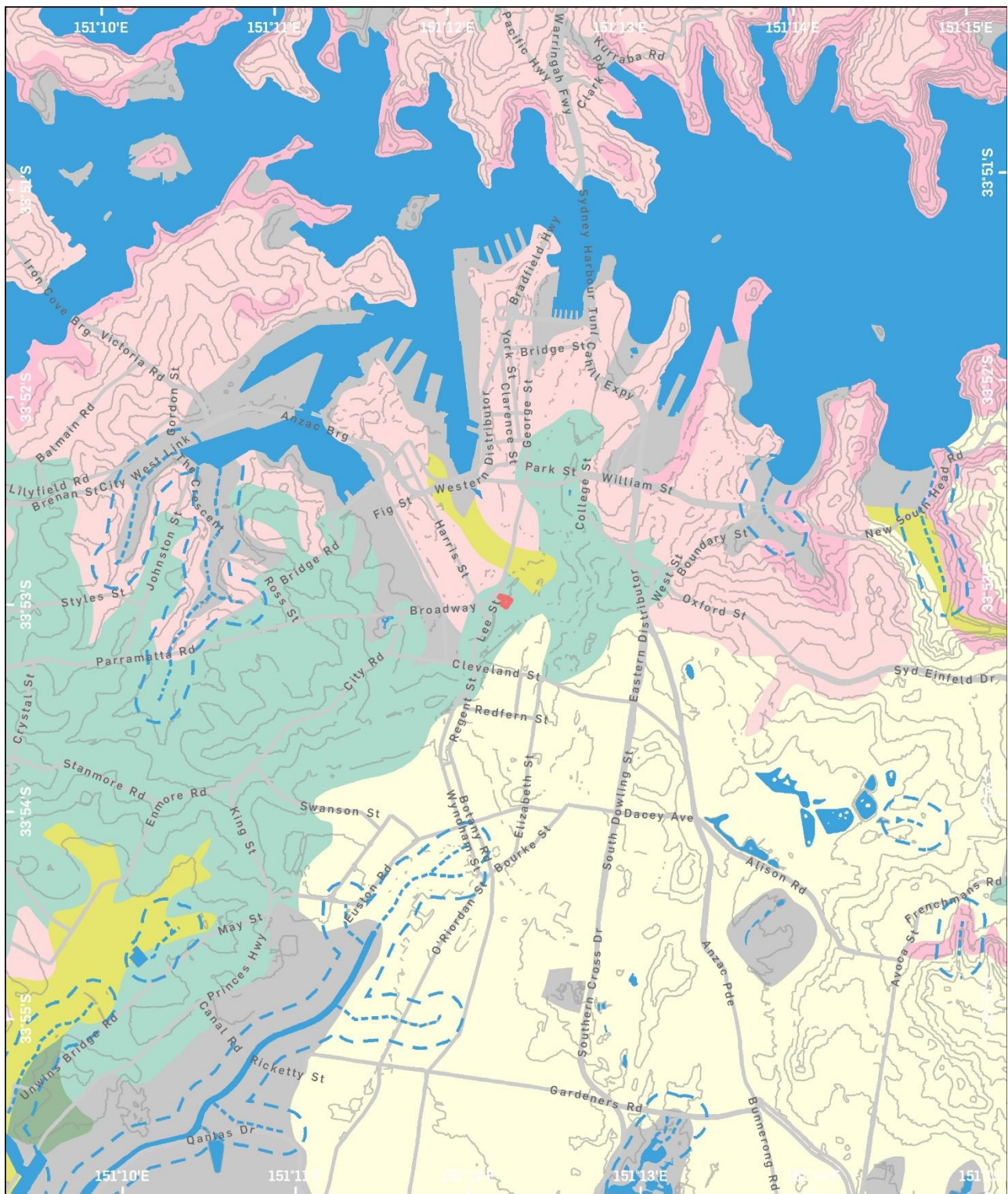
There is no remnant natural vegetation present within the subject area at present day.

At the time of settlement, the subject area would likely have been covered in native vegetation consistent with the sand dune environment, including heath and low scrubs.

Resources would include a variety of floral and faunal species which would have been utilised for medicinal, ceremonial and subsistence purposes.

2.5. HYDROLOGY

The landscape surrounding the subject area has been heavily modified since European occupation commenced and as such there are no observable or documented waterways within proximity to the subject area (Figure 10).



GDA 1994 MGA Zone 56

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Project No: P0020770

Project Manager: Balazs Hansel

- | | | | | |
|-----------------------|-----------------|--------------------------|-----------------------|--------------------|
| Subject Area | Aeolian (AEnh) | Alluvial (ALdc) | Erosional (ERgy/ERla) | Residual (RElh) |
| Hydrology | Aeolian (AEnp) | Colluvial (COha) | Erosional (ERla) | Transferral (TRof) |
| Hydrology 200m Buffer | Aeolian (AEtg) | Disturbed Terrain (DTxx) | Residual (REbt) | Water |
| Contours | Alluvial (ALbg) | Erosional (ERgy) | Residual (REho) | |

Figure 10 – Soil Landscapes and Hydrology

2.6. LANDFORM

2.6.1. Assessment framework

There are varying morphological types of Landform elements (see Figure 11 and Figure 12). The Australian Soil and Land Survey Field Handbook (CSIRO, 2009) identifies ten types. These types are as follows:

Table 7 – Landform Definitions

Type	Definition
Crest (C)	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.
Hillock (H)	Compound landform element comprising a narrow crest and short adjoining slopes, the crest length being less than the width of the landform element.
Ridge (R)	compound landform element comprising a narrow crest and short adjoining slopes, the crest length being greater than the width of the landform element.
Simple Slope (S)	Slope element adjacent below a crest or flat and adjacent above a flat or depression.
Upper Slope (U)	Slope element adjacent below a crest or flat but not adjacent above a flat or depression.
Mid Slope (M)	Slope element not adjacent below a crest or flat and not adjacent above a flat or depression.
Lower Slope (L)	Slope element not adjacent below a crest or flat but adjacent above a flat or depression.
Flat (F)	planar landform element that is neither a crest nor a depression and is level or very gently inclined (<3% tangent approximately).
Open Depression (vale) (V)	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.
Closed Depression (D)	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.

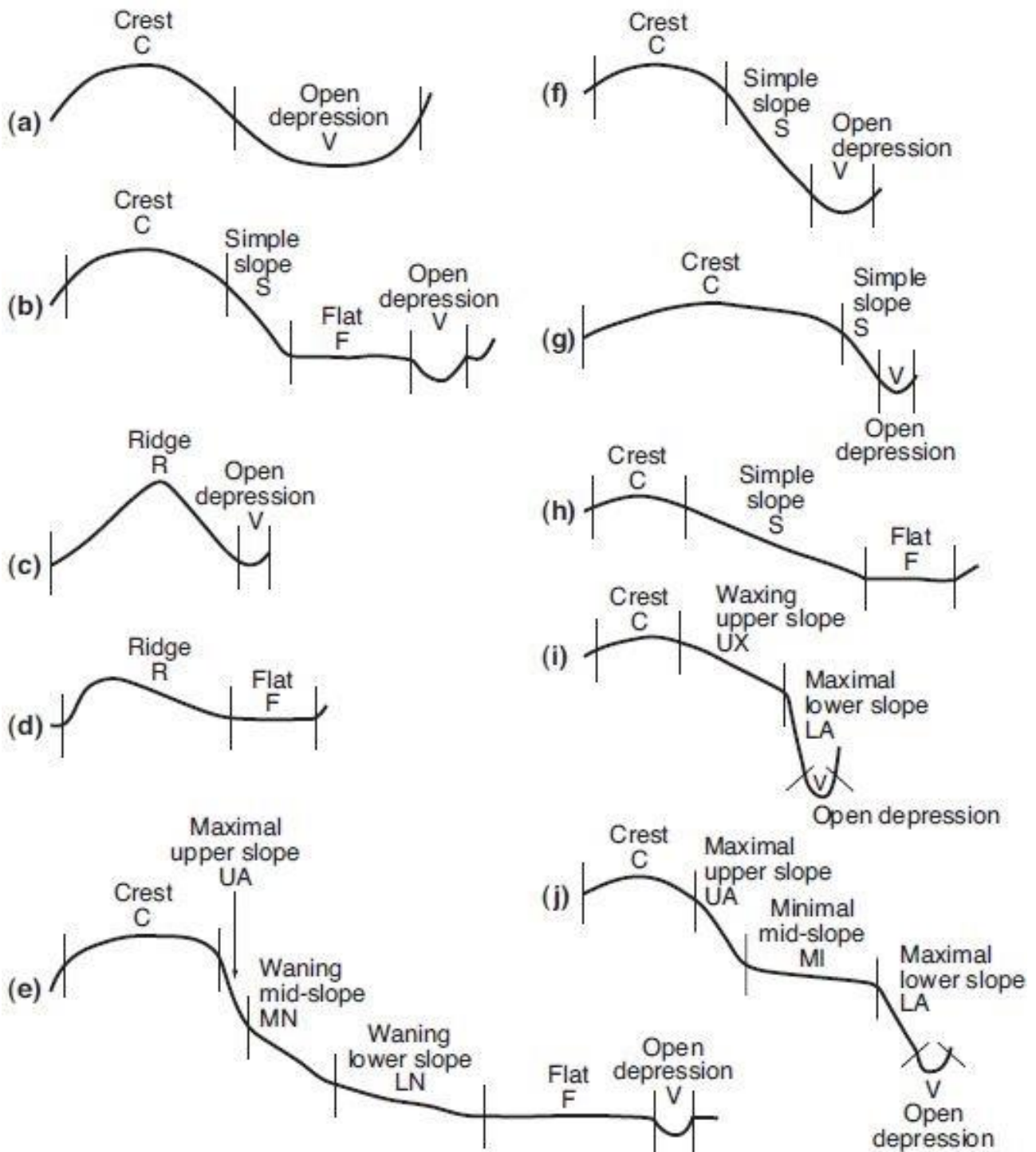


Figure 11 – Landform types

Source: CSIRO, 2009

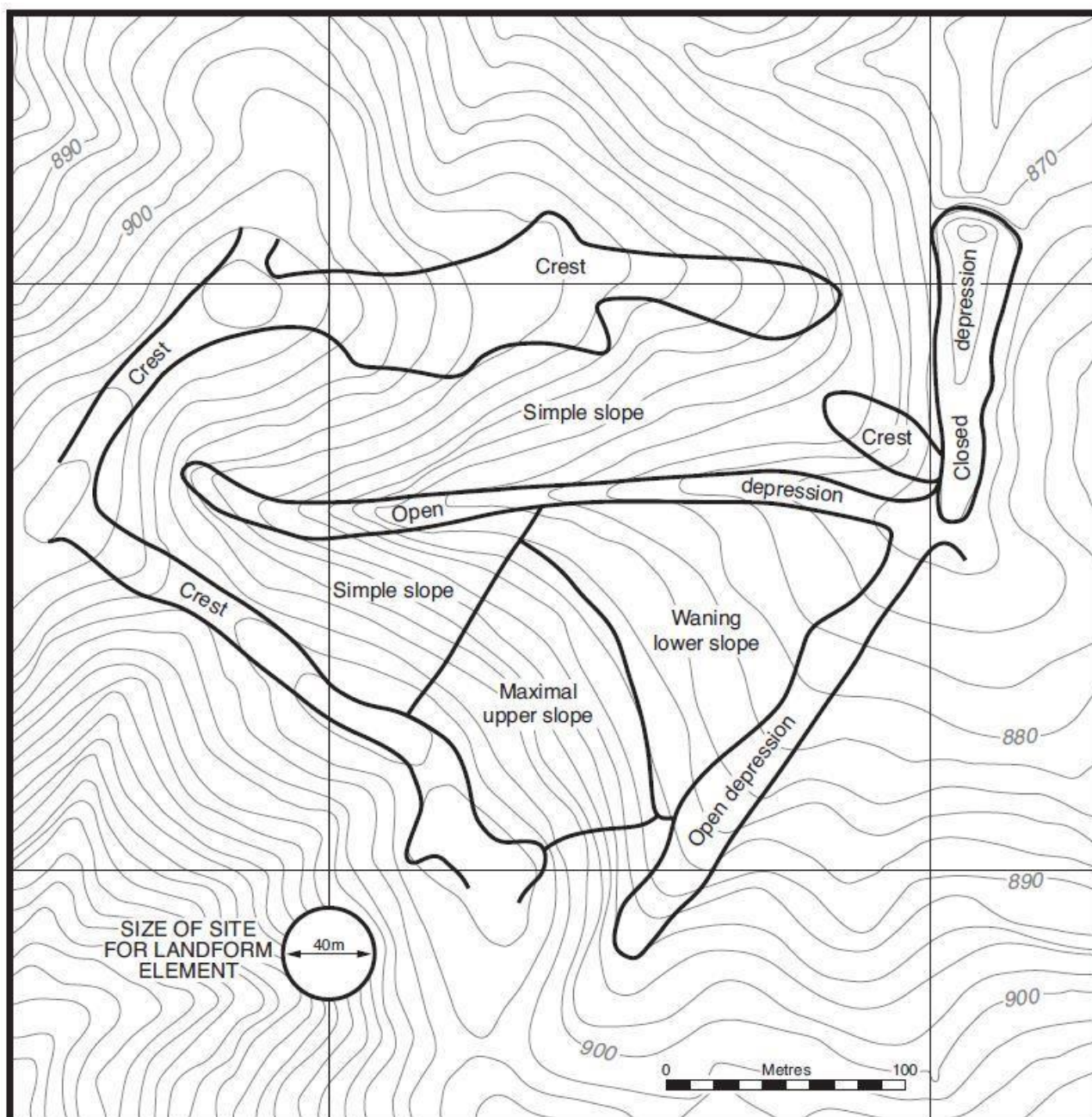


Figure 12 – Landform Patterns.
Source: CSIRO, 2009

2.6.2. Landform assessment of the subject area

The landform within the subject area is heavily modified resulting from post-settlement activity including the Benevolent Asylum and multiple phases of Central Railway Station. The original landform would have been a slight north-westerly slope with localised rises. The subject area is currently relatively flat, with some areas below street level and a slope to the north.

2.7. GEOTECHNICAL ANALYSIS

Arcadis 2018. Geotechnical Desktop Study and Risk Assessment – Tech Central Development, Lee Street, Sydney

Preliminary geotechnical analysis was undertaken in the subject area by Arcadis in 2018. Arcadis provided a Geotechnical Desktop Study, discussing anticipated ground conditions and recommendations.

This assessment identified that the subject area is in close proximity to the geological boundaries of Quaternary Alluvial sediments, which are approximately 200m to the north. Following a review of previous assessments in proximity, Arcadis identified the following discrete geological units, which can be anticipated to occur across the subject area (Table 8):

Table 8 – Anticipated subsurface conditions

Unit	Description	Anticipated location
Fill	Sands and clay associated with historical construction activities	North western end to approximately 2m depth. South eastern end to 10m.
Sands	Source identified as likely being alluvial deposit/paleochannel	South eastern end to 10m, part of an historic paleochannel deposit that is 100m wide.
Residual	Clayey sands/sandy clays derived from the weathering of underlying rock, generally of high plasticity and stiff-very stiff consistency.	North western end to approximately 2m depth. South eastern end to 10m.
Ashfield Shale	Fine grained shale & laminate rock, black to dark grey colour	North western end from 2-3m.
Hawkesbury sandstone	Medium to coarse grained quartz sandstone with minor shale and laminate lenses.	North western end encountered at 3m. South eastern end encountered at 10m.

Arcadis (2018) identified the following risks for the subject area from a geotechnical perspective:

- Building foundations.
- Retention of Parcels Office external structure during bulk excavations.
- Impact on adjacent structures during excavation works, including ground movement.
- Drainage, including the risk of encountering groundwater table within excavation faces.
- Exposure to contaminants/Acid Sulphate Soils during excavation.

Overall, the geotechnical analysis identified that fill is likely to occur across the whole of the subject area to varying depths. In the north-western portion of the subject area, it is likely to overlay Ashfield shale and Hawkesbury sandstone, reducing the likelihood for archaeological materials due to the removal of the natural soil profile. In the south-eastern portion of the subject area, natural sands which form part of an historic paleochannel deposit may be encountered below fill layers, to a depth of approximately 10m where they will overlay Hawkesbury Sandstone.

Arcadis recommended further geotechnical analysis in the form of boreholes and in-situ testing/sampling of soils (Arcadis, 2018). To date the recommended further geotechnical investigation has not been undertaken within the subject area.

Douglas Partners 2020. Report on Supplementary Geotechnical Investigation. Proposed Commercial Development 8-10 Lee Street, Haymarket. Prepared for Vertical First Pty Ltd. Project 86767.00. June 2020.

The Douglas Partners report (2020) presents the results of a supplementary geotechnical investigation undertaken for a proposed commercial development at 8-10 Lee Street, Haymarket. The investigation was commissioned in an email by Avenor Pty Ltd (Avenor) on behalf of Vertical First Pty Ltd (Vertical).

It is understood that the proposed development at the site is to be sub-divided into a 'Developer Works zone' and a 'State Works – Link Zone'. The Developer Works are proposed to include excavation for a two-level basement on the western side of Central Station (i.e. to an elevation of RL5.0 m) followed by construction of a multi-storey commercial tower, whereas the State Works to the west of the tower include a two-level basement to a similar elevation, with a north-south connection to proposed future, adjoining basements.

The supplementary geotechnical investigation was carried out to provide additional information on the subsurface profile and groundwater levels for the assessment of excavation conditions, and to provide information for the design of the basement excavation, shoring systems and foundations. The supplementary geotechnical investigation (completed in conjunction with a supplementary environmental investigation) included drilling boreholes, installation of standpipes with data loggers, and laboratory testing of selected soil and rock samples.

Previous investigations were completed on the eastern part of the site by Douglas Partners Pty Ltd (DP), in conjunction with a preliminary site investigation for contamination. The information obtained from the site investigations was presented in two reports:

- DP Report 86767.00.R.001.Rev0, dated 26 August 2019 (Geotechnical report): and
- DP Report 86767.01.R.001.DftB, dated 29 August 2019 (Environmental report).

These previous investigations included six rock cored boreholes to at least 4 m below the lowest basement floor level (i.e. Boreholes BH1, BH2, BH3, BH5, BH8 and BH9) and three boreholes drilled within the soil to depths of 1.3 m - 2.4 m below the existing lower ground floor level (i.e. Boreholes BH4, BH6 and BH7). Standpipe piezometers were installed in Boreholes BH1, BH5 and BH8, with the installed pipes screened within either alluvial sand (i.e. BH1) or within the underlying very low to high strength rock. Borehole logs and core photographs from the previous investigation are reproduced within Appendix E of this report.

The field work for the supplementary geotechnical investigation (DP 2020) was completed in conjunction with a detailed site investigation for contamination (DSI). The site works were carried out over a five-day period in April 2020 (i.e. 7-8 April, and 14-16 April), and five days in May 2020 (i.e. 16-20 May). The supplementary geotechnical and environmental investigation work included the drilling of a total of 24 boreholes at the locations shown in Figure 13.

Of significance the Douglas and Partners site investigations for the supplementary investigation (2020) *"encountered alluvial and residual soils, and sandstone bedrock consistent with the Mittagong Formation and Hawkesbury Sandstone"* (DP 2020, p.4).

Table 9 – Subsurface conditions encountered in the supplementary boreholes

Material	Description
Concrete	Single or multiple concrete slabs, with or without a brick pavement, asphalt layer, or surface ballast layer (0.15-6.3 m thick); over
Fill	Gravel, sand or clay fill to depths ranging between 4.7 m and 6.3 m on the eastern side of the YHA, or 0.0-2.2 m depth within the access corridor and Gate Gourmet (i.e. the Lower Ground Floor level).
Alluvial Sand	Loose to medium dense, alluvial sand, 0.4-1.2 m thick (Boreholes BH111, BH112A and BH112B only); over
Residual Silty Clay	Soft to hard, residual silty clay, with some ironstone gravel (0.75-2.2 m thick, absent in Borehole BH102, BH105, BH107A); over

Material	Description
Residual Sandy Clay	Very stiff to hard, residual sandy clay (0.2-0.6 m thick, present in Borehole BH102, BH107A, BH107B, BH112A and BH112); over
Sandstone (fine to medium)	Very low to low strength, fine to medium grained sandstone with some medium or high strength, iron-cemented bands (0.65-1.8 m thick: absent in Borehole BH109B). Numerous clay seams were encountered; over
Sandstone (medium)	Medium or high strength, medium grained sandstone

Source: Douglas Partners 2020, p.7

The fine to medium grained sandstone is interpreted to be part of the Mittagong Formation, and the underlying medium grained sandstone is interpreted to be Hawkesbury Sandstone.

Boreholes drilled to investigate the footings of the brick retaining wall along Ambulance Avenue (i.e. Boreholes W1 and W2) encountered stiff to very stiff, silty clay residual soil beneath the concrete footings, whereas the boreholes drilled beneath the concrete underpins along the western site boundary (i.e. from within the Adina Hotel basement: Boreholes W3 and W4) encountered medium to high strength fine grained sandstone with seams of clay and very low strength sandstone.

The interpreted geotechnical models for the site are:

- Eastern part of the site (i.e. below the eastern part of the YHA building, from Upper Ground Floor level: Refer to Drawing 2):
 - soft to firm or very loose to medium dense fill materials (clay or sand: up to 8 m thick, below the current ground surface), over
 - a discontinuous lens of very loose sand alluvium (up to 2.0 m thick), over
 - soft to hard silty clay or sandy clay residual soil (up to about 2.5 m thick), overlying
 - fine to medium grained sandstone, very low strength with high strength iron-cemented bands (0.5-1.8 m thick), and then overlying
 - medium to high strength, medium grained sandstone;
- Central and Western parts of the site (i.e. below the western section of the YHA building and the existing asphalt-surfaced open-air ramp: refer to Drawings 3 and 5):
 - stiff or loose to dense fill materials (clay and sand: up to 2.2 m thick, decreasing in a westerly direction), over
 - a discontinuous lens of very loose to medium dense sand alluvium (up to 1.3 m thick: apparent dip to the south), over
 - very stiff to hard sandy or silty clay residual soil (up to 2.2 m thick), overlying
 - fine to medium grained sandstone (very low strength, with high strength bands: about 2 m thick), and then overlying
 - medium to high strength, medium grained sandstone;

The supplementary geotechnical investigation conducted by Douglas Partners (2020) concluded that across the subject area there is present 2-8m of fill material (which includes sand) over a discontinuous lens of loose to very loose sand alluvium up to 2m thick. These results confirm the assumptions made by Urbis in this assessment that Tuggerah Sands may occur within the subject area below the modern development. These sands contain moderate archaeological potential for subsurface artefact deposits and require further detailed investigation in the form of test excavation. Test excavation will mitigate the associated risk of impacting potential archaeological deposits.

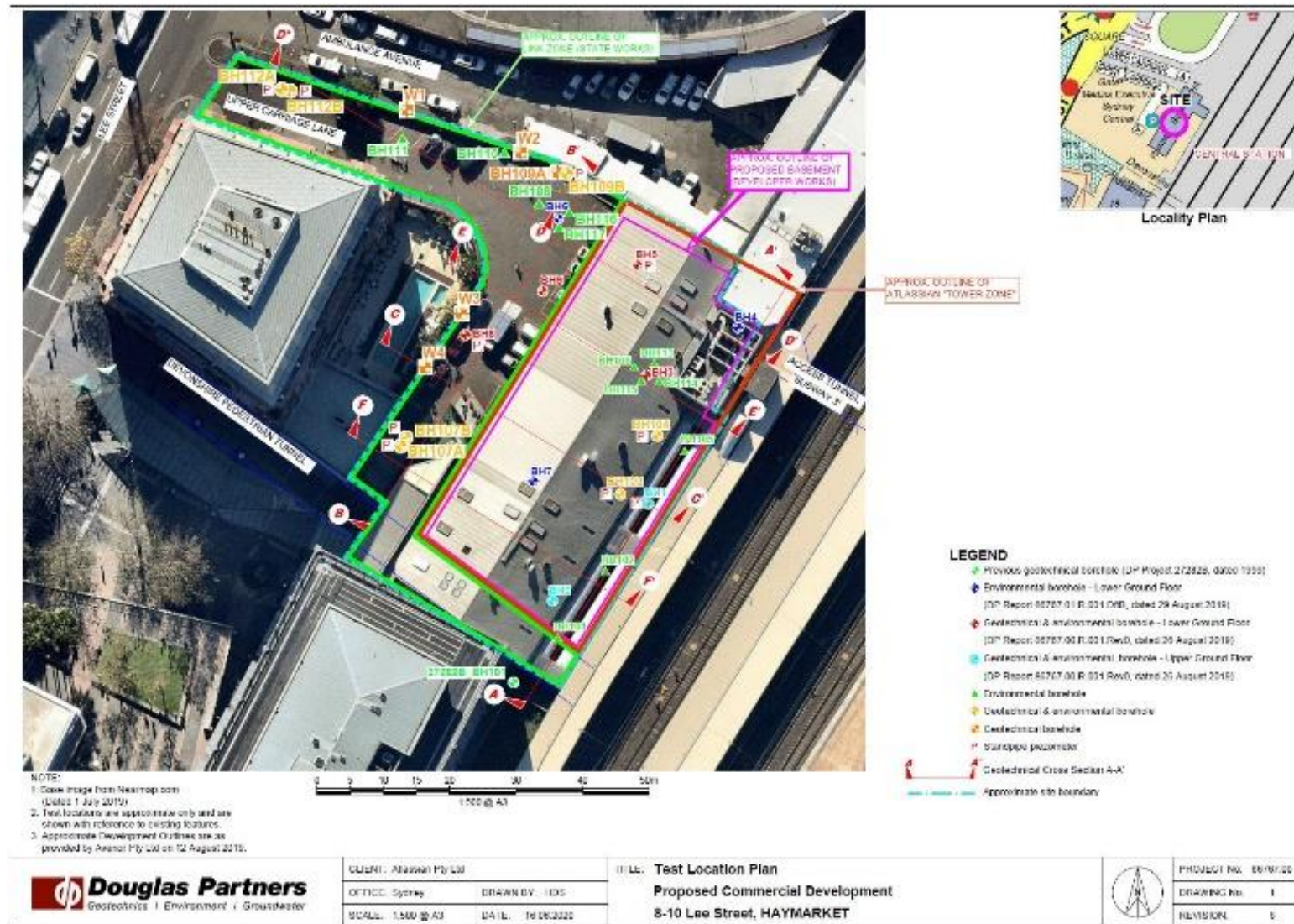


Figure 13 – Geotechnical investigation location plan

Source: Douglas Partners

2.8. PAST ABORIGINAL LAND USE

Aboriginal people have inhabited the Sydney Basin region since at least 30,735+ BP, with some evidence of potential occupation as early as 40,000 years ago (JMCHM 2005a). Due to the absence of written records, it is difficult to infer what life was like prior to the arrival of European settlers. Much of our understanding of Aboriginal life pre-colonisation is informed by the histories documented in the late 18th and early 19th century by European observers. These histories provide an inherently biased interpretation of Aboriginal life both from the perspective of the observer but also through the act of observation. The social functions, activities and rituals recorded by Europeans may have been impacted by the Observer Effect, also known as the Hawthorne Effect. The Observer/Hawthorne Effect essentially states that individuals will modify their behaviour in response to their awareness of being observed. With this in mind, by comparing/contrasting these early observations with archaeological evidence one can establish a general understanding of the customs, social structure, languages, beliefs and general of the Aboriginal inhabitants of the Sydney Basin (Attenbrow 2010).

The Aboriginal population around Sydney at time of first contact has been estimated at between 2000 to 3000 people, with the greater Sydney region estimated at somewhere between 4000 and 8000. The social structure of Aboriginal groups has been documented with the division of tribes commonly being into two moieties within which intermarriage is common (Howitt, 1996). Clan descent is usually patrilineal. Marriages were not restricted to monogamous relationships, with polyamory common. An observation from Collins acknowledges both the occurrence of polyamory and the intermarriage between different groups. Collins describes Bennelong, of the Wanegal Clan, as married to both a woman of Kameraigal descent and a woman of Gweagal descent simultaneously (Collins, 1975).

Given the early contact with Aboriginal tribes in the Sydney region, more is known about these groups than those which inhabited regional areas. In the Sydney region, the land was occupied by the clans of the Eora tribe. The meaning of 'Eora' is unknown, but their land is documented to extend from the Hawkesbury River plateau margins in the north to Botany Bay and the Georges River in the south. There is some controversy regarding the linguistic origins of the Eora People. Some argue that the Eora People were a part of the Darug language group (Kohen, 1993). Others suggest the Eora People formed a distinct and separate language group (Hughes, 1987). The various clans of the Eora people include the Kameraigal, Wanegal, Borogegal and Gadigal. The Gadigal, also known as Cadigal, were believed to occupy the south side of Port Jackson, from South Head to Long Cove (now Darling Harbour) (Tindale, 1974; Turbett, 1989). This area incorporates the Eastern Suburbs, CBD and some of the Inner West.

Prior to European colonisation and development, the lands of the Gadigal people were abundant in resources. The Kangaroo Grounds (around present-day Summer Hill) were on the western border of their land, a border shared with the Wanegal. This was a hunting ground abundant with macropods, which could be used not only for food but also for their hides (Ashfield & District Historical Society, 1996). To the east, north and south of the Gadigal lands is the coastline. Not only were the rivers and streams which provided freshwater critical to Aboriginal groups, but the edible resources of these watercourses were of high importance. The diet of the Gadigal people comprised primarily of fish, shellfish and other aquatic animals. They also sourced roots and foraged for food within the Lachlan Swamplands, now Centennial Park (Tench, 1789). The importance of aquatic resources is attested to in the archaeological record, with middens providing evidence of dietary practices located along the coast and waterways.

The archaeological record also provides evidence for the exploitation of stone materials to create tools and weapons, with high density artefact scatters located across the region. At Bondi Beach, situated in the former sandhills now covered by Campbell Parade, with the centre near what is now the North Bondi Surf Life Saving Club, a large artefact scatter was registered on AHIMS in 1990. This was located in the 1900s following a series of gales which exposed thousands of stone flakes and other tools, with local knowledge suggesting the whole of the back of the beach was covered in stone artefacts accumulated over thousands of years (AHIMS site card #45-6-2169). The distinctive 'backed' points collected from this extensive scatter have since become the type-name for this artefact type, which is located across sites throughout south-eastern Australia – the Bondi Point.

The Bondi Point is the second phase in the Eastern Regional Sequence, an early typology of stone technology from Eastern New South Wales. The first phase is identified as the Capertian Phase, the second is the Bondaian phase and the third is the Eloueran Phase. These phases were identified by McCarthy from excavations at Lapstone Creek and Capertee. McCarthy identified three distinct types of artefact distinguished by age, with Bondi Points (giving the name for Bondaian) restricted to the lower levels, and Elouera increasing in the upper levels (McCarthy, 1940a; 1940b). Subsequent excavations within the Sydney Basin confirmed the sequence but also identified regional variations. These variations were condensed to

include the Capertian and then Early, Middle and Late Bondaian, with Late Bondaian equivalent to Eloueran (Attenbrow, 2002).

There is abundant evidence throughout the Sydney area of contact between the local Gadigal people and European settlers. This evidence exists in the form of contact sites, with material remains including knapped ceramic and glass, European materials in middens, and rock engravings depicting European arrival. A contact period Aboriginal archaeological deposit was recently located during the CSELR works, within the Randwick Racecourse Stabling Yards. This deposit included flint artefacts, with scientific analysis demonstrating that this flint was sourced from the banks of the River Thames in London and transported to Sydney as ships ballast. This archaeological assemblage sheds light on the dynamic relationship between Europeans and Aboriginal groups, the differential assignment of value to material culture (flint ballast and bottle glass) and the spatial distribution of Aboriginal communities during the early years of colonisation (GML, in prep). There is also evidence for ceramic located within Aboriginal middens, for example in excavations undertaken in 1985 at Millers Point (in close proximity to the current subject area) where four sherds of blue and white transfer ware were located within a midden (Lampert, 1985).

As European settlement focused on the foreshores of Port Jackson, Aboriginal groups were pushed out of their traditional camping grounds around Sydney Cove and the domain, and further west. Prince Alfred Park, known at the time as Cleveland Paddocks and in close proximity to the subject area, became an Aboriginal camp site for Gadigal people on the fringes of the settlement of Sydney. This remained so until the mid-19th century when the railway disrupted the camp in 1855. The park became utilised as the showground for the Agricultural Society, pushing Aboriginal people even further out of their own lands (City of Sydney, 2013). It is likely the environment surrounding present-day central station at the time, with sand dunes covered in heath, low scrub, creeks and wetlands, would have not only supported a variety of fauna, but also been an appealing environment for Aboriginal people to camp or hunt within. The modification of this environment through the converting of the present stream to a brick drain and the substantial development within the area not only removed the appeal of the area for Aboriginal occupation, but furthermore likely removes any potential archaeological remains of Aboriginal occupation across the site (GML, 2019).

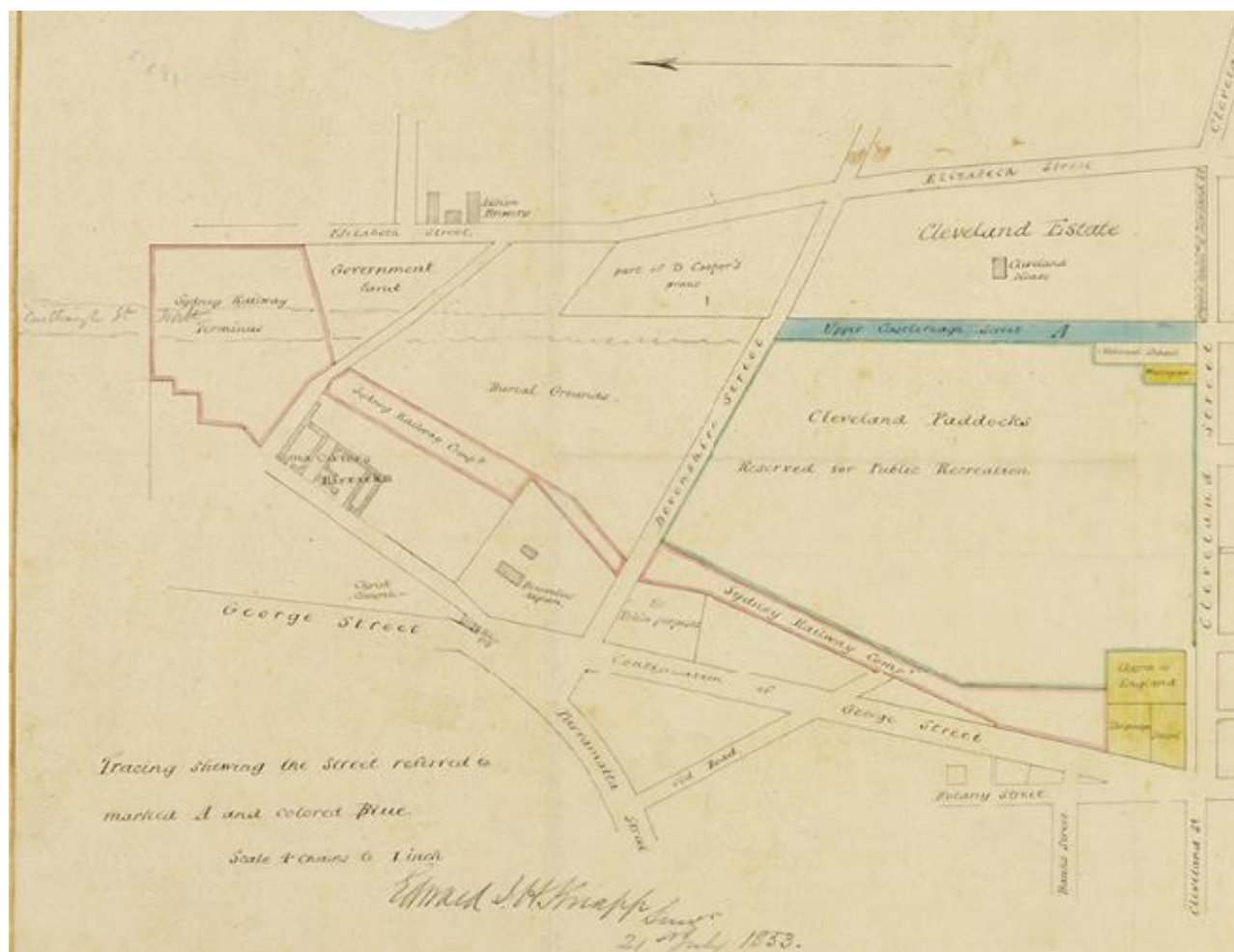


Figure 14 – Edward Knapp, *Tracing showing Proposed continuation of Castlereagh Street and widening of Cleveland Street, Sydney 1853*. Cleveland Paddocks indicated in green.

Source: State Library of NSW

In general the impacts of colonisation were devastating for all Aboriginal people, but particularly for those groups living around the coast and Sydney Cove. With colonisation, Aboriginal people were forced away from their lands and the resources they relied upon. Settlement around the coast drove faunal resources further inland, reducing the traditional hunting grounds of local Aboriginal groups (Evidence, 1835). Further to this, diseases including smallpox and conflicts between local Aboriginals and colonisers decimated their population. Rather than accepting fault for this, some colonisers attributed this population decline to the introduction of alcohol and other vices (Dredge, 1845). In 1789, an epidemic believed to be smallpox and called gal-galla by the local Aboriginal people resulted in great population decrease (Attenbrow, 2002). Early colonial accounts state '*From the great number of dead Natives found in every part of the harbour, it appears that the small pox had made dreadful havoc among them*' (Bradley, 1789 cited in Kelly, 1997 pg. 30). Other historic accounts of the epidemic state that it resulted in the near complete decimation of the Gadigal clan, with only three people reportedly remaining – two of which were Colbee and Nanbaree (Collins, 1798).

Aboriginal people did not cease to exist within the Sydney region following European settlement, despite the devastating impacts it had. Aboriginal people continued to live in the area, adapting to the changes brought by settlement. This led to displacement of Aboriginal people from all over the country. There are stories, for example, of Aboriginal people from the South Coast of New South Wales migrating to La Perouse in search of employment (Kensy, 2008). However, not all of this movement was voluntary. In the early 1880s, George Thornton was appointed by Sir Henry Parkes as the "Protector of Aborigines". Thornton supported the removal of Aboriginal people from traditional lands in urban areas (Goodall, 1996). In 1883, the "Aborigines Protection Board" (APB) was established, replacing Thornton. The Board established reserves, to which Aboriginal people were forcibly removed, segregating Aboriginal people from the rest of the community. More insidious were the Missions, a modified form of reserve which sought to convert Aboriginal people to Christianity (OEH, 2012). The APB were also responsible for the removal of Aboriginal children, resulting in the Stolen Generations. In 1909, the APB was given legislative authority under the "*Aborigines Protection Act*". These missions and reserves were closed between the 1920s-1960s following changing public attitudes.

The fight for Aboriginal recognition was a political one. On 26th January 1938, a "Day of Mourning" protest was held, following campaigns by Aboriginal individuals including Jack Patten, William Cooper and Pearl Gibbs (a Botany Bay local) who fought for civil rights including the right to vote and representation in Parliament. This struggle was long fought, and Aboriginal and Torres Strait Islanders were granted the right to vote Australia wide by 1965. Aboriginal people were recognised in the census and subject to Commonwealth laws following the referendum for Indigenous Rights in 1967. Aboriginal people across Sydney and Australia continue to fight for recognition. In February 2008, then Prime Minister Kevin Rudd delivered an address apologising for the mistreatment of Aboriginal people throughout history and committing to closing the gap, recognising Aboriginal cultures as "*the oldest continuing cultures in human history*" (Rudd, 2008). In contemporary times, respect for Aboriginal people and connection to Country continues to grow. Despite attempts to eradicate Aboriginal people throughout the 19th and 20th centuries, Aboriginal communities continue to thrive across Australia, and Aboriginal individuals and organisations play a vital role in all levels of society.

2.9. HISTORICAL LAND USE

The history of the subject area is briefly addressed below and is further elaborated in the Historical Archaeological Assessment (HAA) produced by AMBS (2020) for the for the SSD (10405).

In the late 18th and early 19th centuries, the subject area lay on the southern outskirts of the colony of Sydney. Other than the brickfields to the immediate north, little development of the area around present-day Central Station occurred until the 1820s. Under Governor Macquarie, the area was developed from around 1820, with the establishment of the Devonshire Street Cemetery and the construction of the Benevolent Asylum and Carters Barracks. The subject area falls within the area of land apportioned to the Benevolent Asylum (Figure 15).

The Benevolent Asylum was built by the Benevolent Society, a charitable organisation that began as The NSW Society for Promoting Christian Knowledge and Benevolence (1813) and later became The Benevolent Society of NSW (1818). Officially opened in 1821, the Benevolent Asylum was a two-storey brick building that measured ninety-seven feet long and twenty-five feet wide and faced Pitt Street. A smaller building was situated behind the main building which housed the kitchen and Superintendent with a separate outhouse. Extensions were made to the Benevolent Asylum in the 1830s and 1850s to increase capacity and provide hospital facilities. A plan from 1855 (Figure 15) shows the southern wing of the main building overlapping with the northern end of the approximate location of the subject area.

Water was reticulated in the area in the 1860s and it had been connected to the sewer by the 1870s. Figure 16 indicates the sewer main cutting through the western section of the approximate location of the subject area. Final alterations to the exterior of the Benevolent Asylum were made in 1874 (compare Figure 17 and Figure 18). A plan from 1888 (Figure 19) shows extensions to the western wing of the main building and an additional iron outbuilding within the approximate location of the subject area.

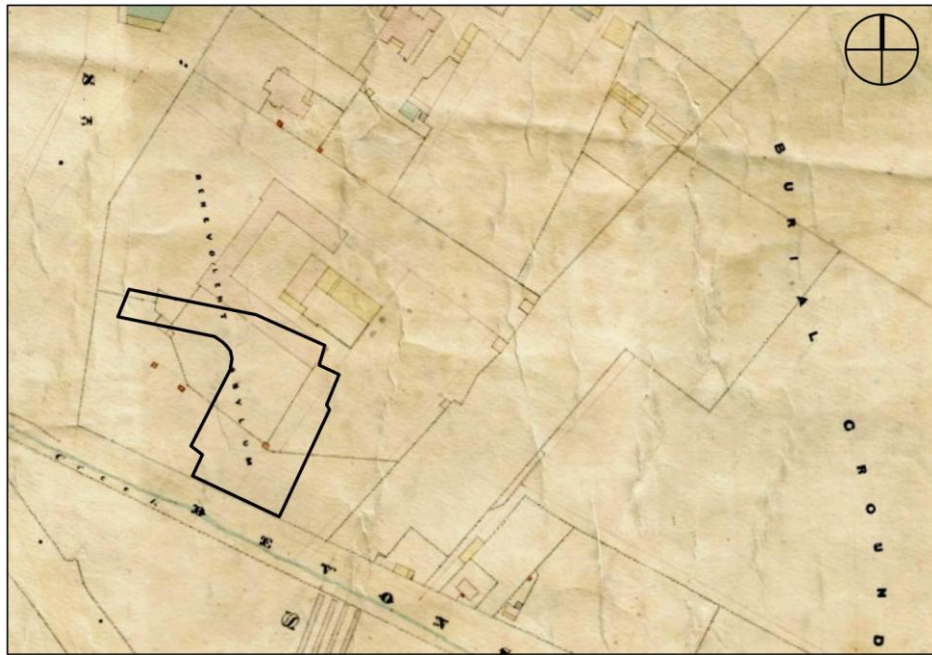


Figure 15 – 1855 Plan with Benevolent Asylum (approximate location of study area overlaid). Reproduced from the AMBS HAA (2020).

Source: City of Sydney Archives, Detail Plans, 1855: Sheet 23, [A-00880168]

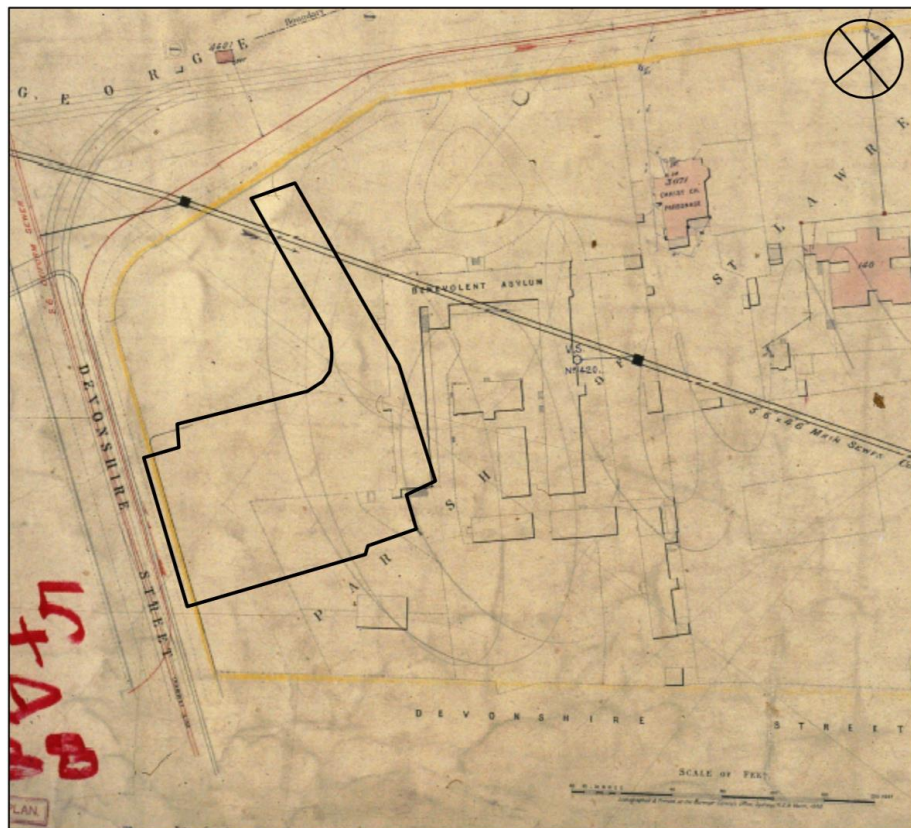


Figure 16 – Detail of Sydney Water Archive Plan, BLKWTL3845, dated March 1888. The main sewer runs north-east to south-west across the Benevolent Asylum and the study area (the approximate location of study area is overlaid). Reproduced from the AMBS HAA (2020).

Source: Sydney Water Archives.



Figure 17 – Benevolent Asylum 1871. Reproduced from the AMBS HAA (2020).
Source: *State Library of NSW*, IE1232164.



Figure 18 – Benevolent Asylum c.1892-1900. Reproduced from the AMBS HAA (2020).
Source: *State Library of NSW*, IE3326895.

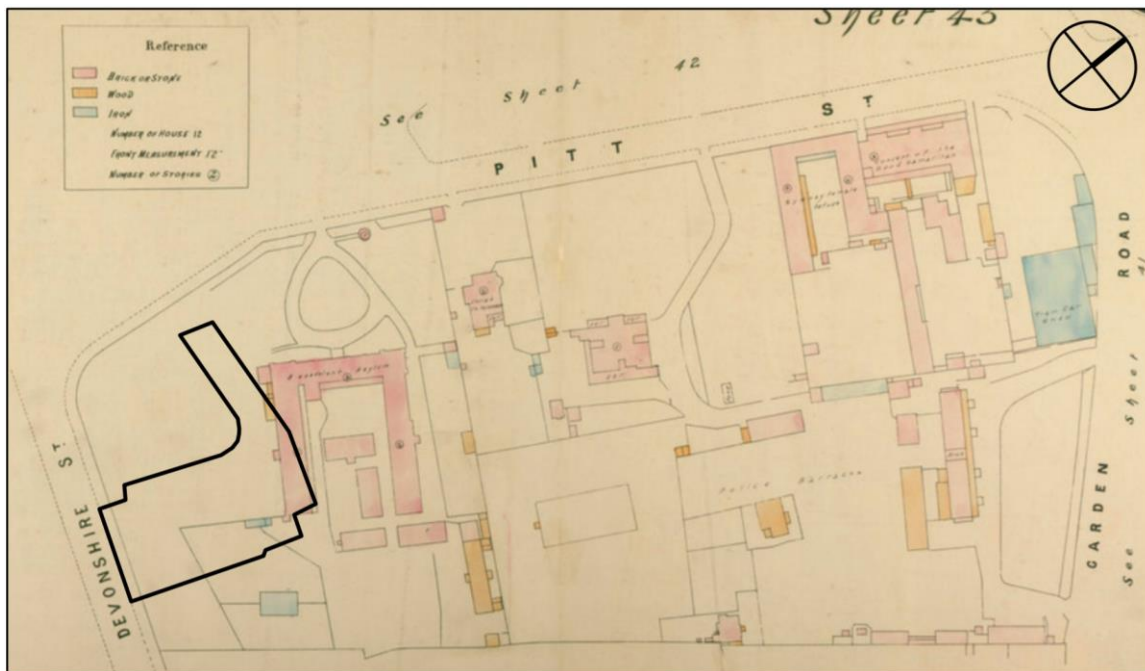


Figure 19 – Rygate & West Plan of Sydney, Sheet 43, dated August 1888, showing the study area (approximate location overlaid). Reproduced from the AMBS HAA (2020).
Source: City of Sydney Archives, [A-00880458] <<https://archives.cityofsydney.nsw.gov.au/nodes/view/1709385>>

Opposite the Benevolent Asylum, on the southern side of Devonshire Street, Sydney's first railway station was opened in 1855 (Figure 20). Redfern Station, as it was called, comprised a single timber platform with several iron buildings. An engine shed, carriage shed and goods shed were added the following year. Most buildings were constructed of wood, with only a few constructed of brick or stone. In response to public pressure for a permanent station, a new railway station was built at the same location in 1871 and opened in 1874. The new station building was a brick construction with two platforms. To meet growing passenger demand, a third platform was added in 1878 and additional carriage sheds, good sheds, workshops, siding and other infrastructure were also constructed. Increasing demand began to put pressure on Sydney station and the number of lines was quadrupled in 1884 to deal with the increased traffic.

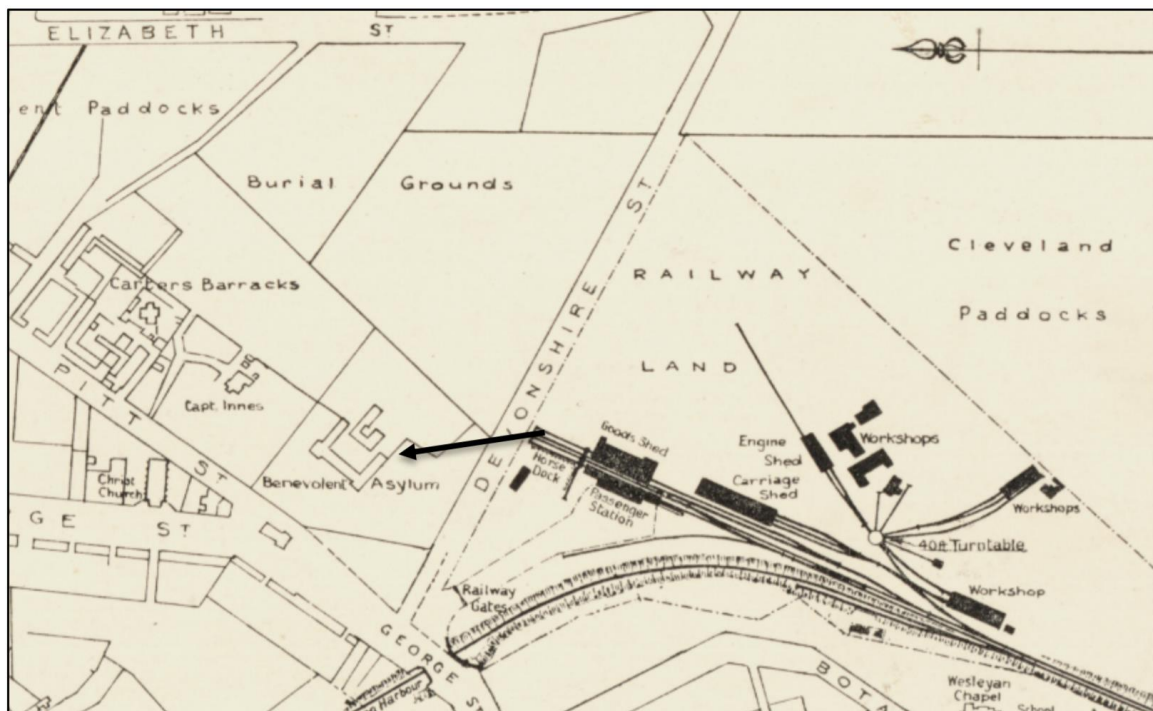


Figure 20 – Sydney Station 1855, study area arrowed. Reproduced from the AMBS HAA (2020).
Source: NSW State Library, IE8790300.

A proposal for a new terminus at the present site of Central Station was submitted by Edward Eddy in 1891, which was adopted in 1900. The land north of Devonshire Street on which Central Station is now located was resumed in 1901. By mid-1902 it was reported that all buildings within this area, including the Benevolent Asylum (Figure 21 and Figure 22), were demolished and the graves from the cemetery reinterred. In preparation for construction of the terminus, significant earthworks were undertaken to make Central Station level with the old station. The eastern (cemetery) side of the block was excavated and levelled and the north-west section (along Lee Street) built up (Figure 23). Construction of the terminus buildings began in 1902 and proceeded in two stages. The first stage was completed by 1906 and the second stage between 1915 and 1921. The Sydney Terminus building was opened in August 1906 and the old station demolished soon after.



Figure 21 – 1901-1902 Benevolent Asylum after demolition, looking towards Pitt Street. Reproduced from the AMBS HAA (2020).

Source: State Library of NSW, IE8952327, Royal Australian Historical Society photonegatives.



Figure 22 – 1901-1902 Benevolent Asylum looking West from Pitt Street South. Reproduced from the AMBS HAA (2020).

Source: State Library of NSW, IE8952327, Royal Australian Historical Society photonegatives.



Figure 23 – Looking back towards Redfern Station, cleared land for Central Station. Reproduced from the AMBS HAA (2020).

Source: State Library of NSW, IE11306447.

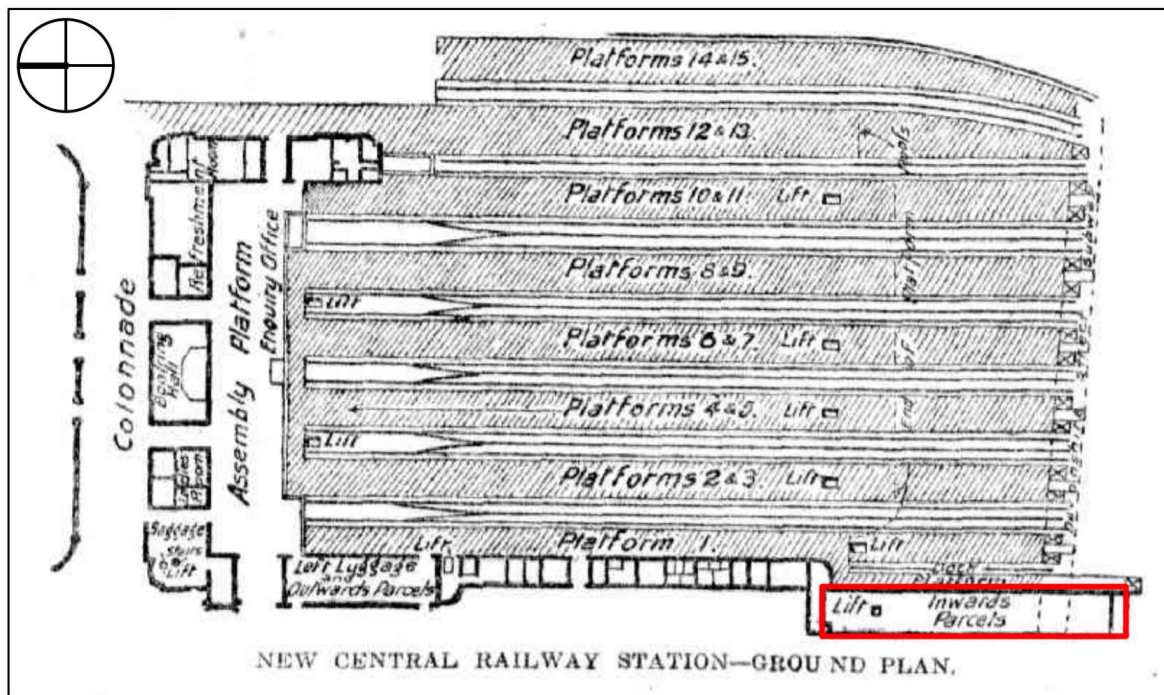


Figure 24 – Diagram of the layout of Central Station at the time of the opening. The Inwards Parcels Shed is depicted at the southern end of the station (boxed in red). Reproduced from the AMBS HAA (2020).

Source: *The Daily Telegraph* (2 August 1906) New Railway Station, p. 4, viewed 19 February 2020, <http://nla.gov.au/nla.news-article237638849>

The Inwards Parcel Shed, located in the eastern section of the subject area, was completed by 1906 during the first stage of construction of Central Station. It was built at platform level at the southern end of Platform 1, on its western side (Figure 24). The shed was constructed of corrugated metal and had a loading dock attached with an adjacent yard on its western side. It was accessed by a ramp from Railway Square, with vehicles exiting into Lee Street via a bridge that spanned the Devonshire Street pedestrian subway (Figure 25 and Figure 26). The Parcels Post Office (Figure 26) was constructed adjacent the subject area and opened in c.1913. The Inwards Parcel Dock, West Carriage Shed and Parcels Dock awning were demolished for the Henry Deane Park Plaza development in 1999-2000. These were located in close proximity to, but outside the current study area. The Inwards Parcels Shed was converted into backpackers' accommodation in c.2000. The works included an exterior dining and lounge area, which occupies the former parcels platform on the western side, and construction of a small swimming pool and interior dining area in a section of the former yard on the eastern side.



Figure 25 – Central Station overlooking Railway Square, prior to 1913. Inwards Parcels Shed is seen to the right. Reproduced from the AMBS HAA (2020).
Source: Weir Phillips Heritage & Planning 2018:15.

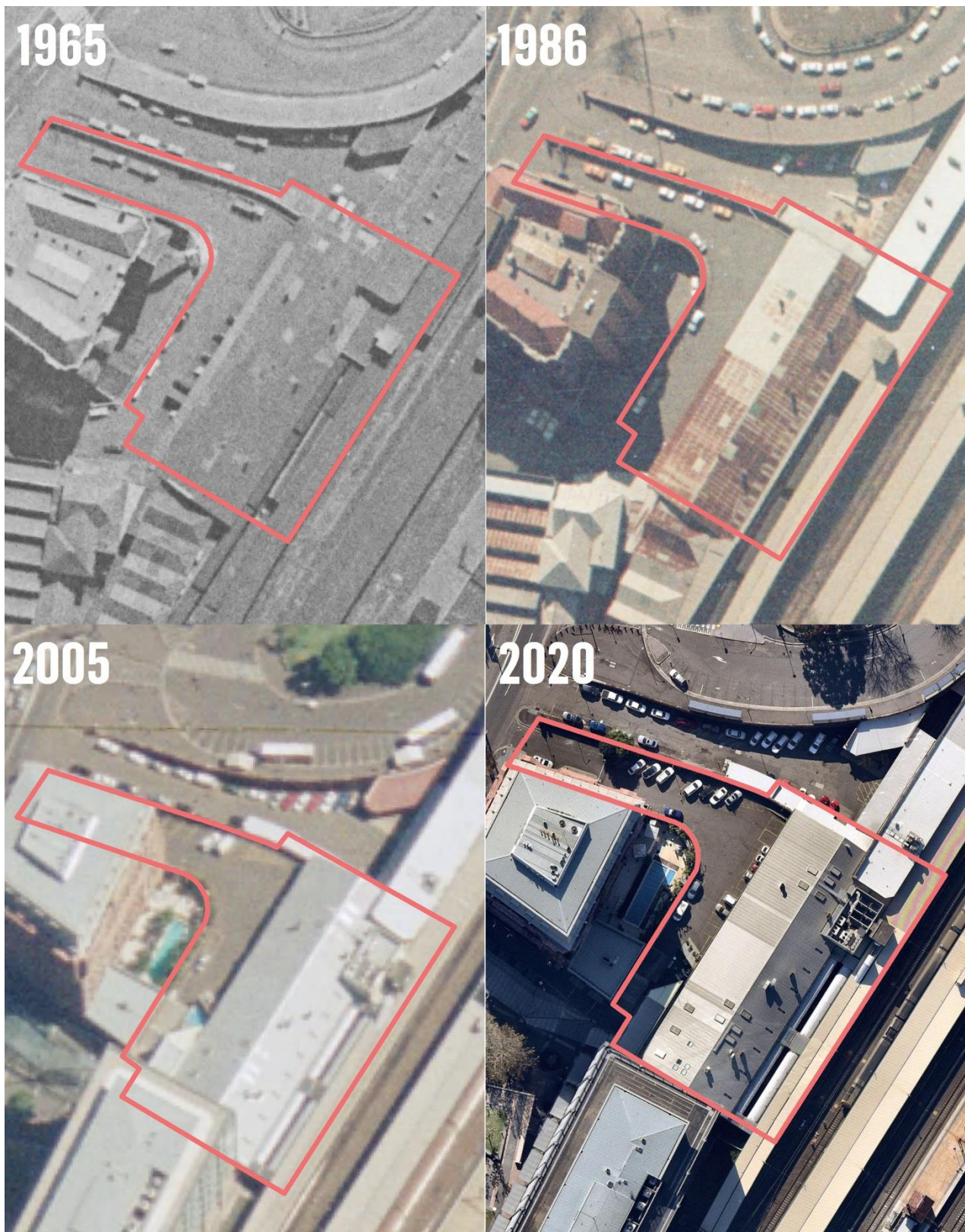


Figure 26 – Central Station looking south. Inwards Parcels Shed and Post Office, 1910s. Reproduced from the AMBS HAA (2020).
Source: Weir Phillips Heritage & Planning 2018:15.

The development of facilities within the subject area has caused substantial levels of ground disturbance. This is demonstrated through the analysis of historic aerials. Historic aerial images from 1965, 1986, 2005 and 2020 were analysed to develop an understanding of disturbance (see Figure 27) and is included in Table 10.

Table 10 – Analysis of historical aerials

Year	Observation
1965	In 1965, the subject area has already been cleared and developed. This is to be expected for this area of Sydney, where development activities took place early on in settlement. In this aerial, the subject area is not entirely dissimilar to its current state. The Inward Parcels Shed, constructed in 1906, is present within the subject area, serving as a clearing warehouse for parcels. The north of the subject area is occupied by the ramp, constructed in 1906, leading from Lee Street to the forecourt of the Inwards Parcel Shed, where parking is seen to take place.
1986	In the 1986 aerial, the subject areas remains unchanged from 1965.
2005	<p>By 2005, the area surrounding the subject area shows evidence of minor modification. Henry Deane Plaza has been developed to the south, with an office building constructed on Lot 12 DP2062447 to the south of the Inwards Parcel Shed. There was also been a pool constructed in the eastern edge of the neighbouring Adina Apartments (Former Parcels Post) building, which appears to stray partially into the western edge of the current subject area. There has also been further development to the east of the subject area at this point, on the platforms of central station.</p> <p>The major change in this period is to the roof of the Inwards Parcel Shed, which is rusted in 1986 but appears to have been modified by 2005 with a new roof in place.</p>
2020	The subject area has not changed between 2005 and the present day.



GDA 1994 MGA Zone 56



50 M

Project No: P0020770

Project Manager: Balazs Hansel

 Subject Area

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HISTORICAL AERIAL PHOTOGRAPHS
Former Inwards Parcels Office
Prepared on behalf Atlassian Pty Ltd

Figure 27 Historical Aerial Imagery

3. CONSULTATION PROCESS

In administering its statutory functions under Part 6 of the NSW National Parks and Wildlife Act 1974, the Department of Planning, Industry and Environment (DPIE) requires that Proponent consult with Aboriginal people about the Aboriginal cultural heritage values (cultural significance) of Aboriginal objects and/or places within any given development area in accordance with Clause 80c of the NSW National Parks and Wildlife Regulation, 2009.

The DPIE maintains that the objective of consultation with Aboriginal communities about the cultural heritage values of Aboriginal objects and places is to ensure that Aboriginal people have the opportunity to improve ACHA outcomes by (DECCW 2010a):

- providing relevant information about the cultural significance and values of Aboriginal objects and/or places.
- influencing the design of the method to assess cultural and scientific significance of Aboriginal objects and/or places.
- actively contributing to the development of cultural heritage management options and recommendations for any Aboriginal objects and/or places within the proposed subject area.
- commenting on draft assessment reports before they are submitted by the Proponent to the DPIE.

Consultation in line with the Consultation Requirements (DECCW 2010) is a formal requirement where a Proponent is aware that their development activity has the potential to harm Aboriginal objects or places. The DPIE also recommends that these requirements be used when the certainty of harm is not yet established but a Proponent has, through some formal development mechanism, been required to undertake a cultural heritage assessment to establish the potential harm their proposal may have on Aboriginal objects and places.

Consultation for this assessment, has been undertaken in accordance with the Consultation Requirements as these meet the fundamental tenants of the 2004 consultation requirements (NSW Department of Environment and Conservation [DEC] 2004), while meeting current industry standards for community consultation.

The Consultation Requirements outline a four-stage consultation process that includes the following:

Stage 1 – Notification of project proposal and registration of interest.

Stage 2 - Presentation of information about the proposed project.

Stage 3 - Gathering information about the cultural significance.

Stage 4 – Review of draft cultural heritage assessment report.

The document also outlines the roles and responsibilities of the DPIE, Registered Aboriginal Parties (RAPs) including Local and State Aboriginal Land Councils, and Proponents throughout the consultation process.

To meet the requirements of consultation it is expected that Proponents will:

- Bring the RAPs, or their nominated representatives, together and be responsible for ensuring appropriate administration and management of the consultation process.
- Consider the cultural perspectives, views, knowledge and advice of the RAPs involved in the consultation process in assessing cultural significance and developing any heritage management outcomes for Aboriginal objects(s) and/or places(s).
- Provide evidence to the DPIE of consultation by including information relevant to the cultural perspectives, views, knowledge and advice provided by the RAPs.
- Accurately record and clearly articulate all consultation findings in the final cultural heritage assessment report.
- Provide copies of the cultural heritage assessment report to the RAPs who have been consulted.

The consultation process undertaken to seek active involvement from relevant Aboriginal representatives for the Project followed the current NSW statutory guideline, namely, the Consultation Requirements. Section 1.3 of the Consultation Requirements describes the guiding principles of the document. The principles have

been derived directly from the principles section of the Australian Heritage Commission's Ask First: A guide to respecting Indigenous heritage places and values (Australian Heritage Commission 2002).

The following outlines the process and results of the consultation conducted during this assessment to ascertain and reflect the Aboriginal cultural heritage values of the subject area. Further information in regard to the Aboriginal community consultation processed is outlined in Appendix C.

3.1. STAGE 1: NOTIFICATION OF PROJECT PROPOSAL AND REGISTRATION OF INTEREST

3.1.1. Government Organisation Contacts

The aim of Stage 1 is to identify, notify and register Aboriginal people who hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places in the subject area.

A search of the Native Title Tribunal was undertaken on 18th February 2020. This search identified the subject area as freehold tenure which extinguishes native title.

To identify Aboriginal people who may be interested in registering as Aboriginal parties for the project, the organisations stipulated in Section 4.1.2 of the Consultation Guidelines were contacted (refer to Table 11).

Table 11 – Contacted Organisations

Organisation	Date notification sent	Date response received
Office of the Registrar, Aboriginal Land Rights Act 1983	21/02/2020	21/02/2020
Department of Planning, Industry and Environment, Greater Sydney Branch, Communities and Greater Sydney Division	21/02/2020	16/03/2020
NTS Corp	21/02/2020	N/A
Metropolitan Local Aboriginal Land Council	21/02/2020	N/A
Local Land Services, Greater Sydney	21/02/2020	N/A
City of Sydney Council	21/02/2020	16/03/2020
National Native Title Tribunal	18/02/2020	19/02/2020

The template for the emails sent to the above-mentioned organisations is at Appendix C. A total of 44 Aboriginal groups and individuals with an interest in the subject area were identified following this stage. These groups were contacted, with further information presented at Section 3.1.2 below.

3.1.2. Registration of Interest

In accordance with Section 4.1.3 of the Consultation Guidelines, letters were sent to the 44 Aboriginal groups and individuals on 11th March 2020, via email or post (depending on the method identified by each group), to notify them of the proposed project. A total of 41 were sent via email, with three sent by registered post. The letters afforded a response time of 14 days, being 25th March 2020 in accordance with the 14-day minimum requirement. The letter template is shown at Appendix C and includes a brief introduction to the project and the project location.

A total of six groups registered interested in the project as a result of this phase within the nominated timeframe. Acknowledgement emails or telephone calls were made by Urbis to respondents, to confirm registration had been received (refer Table 12).

Table 12 – Stage 1 Consultation – Registration of Interest

Organisation/Individual	Contact Person
Metropolitan Local Aboriginal Land Council (MLALC)	Selina Timothy
Didge Ngunawal Clan (DNC)	Lilly Carroll & Paul Boyd
Tocomwall	Scott Franks & Danny Franks
Ginninderra Aboriginal Corporation (GAC)	Steven Johnson & Krystle Carroll
Kamilaroi Yankuntjatjara Working Group (KYWG)	Phil Khan
Clive Freeman	N/A

3.1.3. Newspaper advertisements

In accordance with Section 4.1.3 of the Consultation Guidelines, an advertisement was placed in one local newspaper, the Inner West Times. This advertisement was published in the City Hub paper on the 12th March 2020 providing 14 days to register an interest in accordance with the Consultation Requirements. This public notice was intended to run on the 11th of March 2020, with registration open to 25th of March. The public notice did not run until 12th March 2020, however registrations were kept open until 1st April 2020. One late registration was received in response to the invitation to register, on the 27th of March 2020.

A copy of the advertisement is included at Appendix C.

The list of Registered Aboriginal Parties (RAPs) was provided to DPIE and the Metropolitan Local Aboriginal Land Council on the 9th April 2020 (see Appendix C).

3.2. STAGE 2: PRESENTATION OF INFORMATION ABOUT THE PROPOSED PROJECT

The aim of Stage 2 is to provide registered Aboriginal parties with information about the scope of the proposed project, and the proposed cultural heritage assessment process. A combined Stage 2 and 3 Information Pack which included a brief introduction to the project, the project location, and AHIMS search result to provide understanding of the registered cultural sites in the local area, was sent to registered Aboriginal parties via email on the 9th April 2020. Request for response to the Information Packet was set to 7th May 2020. A reminder email was sent to RAPS on 23rd April 2020.

The Information Pack was prepared as a combination of Stage 2 and 3 of the Consultation Guidelines, and included the following information:

- Project overview, location and purpose.
- Proposed works.
- Brief environmental and historical background.
- Notification of the site inspection.
- Protocol of gathering information on cultural heritage significance.
- Request for comment on methodology and recommendations for site investigation, and request for any cultural information the respondent wished to share.

The letter is included at Appendix C of this report.

Urbis intended to invite RAPs to attend an onsite meeting. However, due to the advent of the Coronavirus worldwide pandemic and the social distancing measures required, this was deemed by Urbis to not be possible. The Stage 2 and 3 document expanded on the Urbis response to the pandemic and included the following:

Given the changing and uncertain nature of COVID-19, Urbis have put in place several measures to support business continuity. With this in mind the archaeological survey methodology will have to be flexible in order to best manage community and departmental expectations with the health and wellbeing of staff.

Urbis proposes the following methodology to undertake an archaeological field survey for the project:

Field survey with one Urbis Archaeologist – Social distancing would be the key factor in this methodology and restricting the survey to a single Urbis archaeologist would ensure this. All data would be provided to the RAPs and along with detailed/extended consultation.

The aim of the survey is to provide an opportunity for the RAP(s) to provide any cultural information they may have for the development area that might inform the future management or protection of Aboriginal cultural heritage. It will also inform any potential excavation of the study area.

Following the implementation of the preferred option above Urbis will provide a short letter document outlining the survey undertaken to date. The letter would include a detailed photographic record of the subject area and discuss the level and type of impacts within the subject area. In addition to this letter we would supply contact details of our archaeologists who could discuss any aspect further. This approach would enable the RAPs to have as detailed an understanding of the subject area as is practicable prior to issuing of the draft ACHA without any associated health risk.

Note: this is a unique document with no stipulated consultation review period. It is recommended that at least 14 days be supplied for RAPs to comment and Urbis to respond.

3.3. STAGE 2 INFORMATION PACKAGE ADDENDUM LETTER: SURVEY

An addendum letter to the Stage 2/3 documentation was supplied to all RAPs on 8th May 2020. The letter presents the preliminary results and recommendations for this assessment, acknowledging that conclusions regarding any potential cultural significance of the subject area cannot be reached until the consultation process is completed. The letter was part of the evolving response to the Covid-19 pandemic Urbis implemented. The wellbeing of all Urbis staff as well as our clients and stakeholders is paramount and informed our methodologies and protocols.

In this context Urbis implemented a conservative social distancing approach in which the typical group survey was determined to not be an appropriate course of action due to the confined nature of the subject area (close internal spaces, basements). As such the site survey was restricted to one project Archaeologist Senior Archaeologist (Andrew Crisp) on the 10th March 2020. The interior spaces of the Former Inwards Parcels Office hindered the utilisation of appropriate social distancing measures and the survey methodology was developed in order to limit the spread of any potential infection as a result of the project.

The RAPs were requested to submit any comments regarding the potential cultural significance of the subject area or any concerns they may have with the proposed works by the 22nd May 2020. This provided an additional minimum two weeks for all RAPs to provide further input. It was reiterated in the addendum letter that following the close of the consultation period for the letter any comments provided would be addressed in the draft ACHAR. The draft ACHAR would subsequently be provided for review and comment.

3.4. STAGE 3: GATHERING INFORMATION ABOUT CULTURAL SIGNIFANCE

Stage 3 is concerned with gathering feedback on a project, proposed methodologies, and obtaining any cultural information that registered Aboriginal parties wish to share. This may include ethno-historical information, or identification of significant sites or places in the local area.

A single response to the Stage 2/3 Information Pack and addendum survey letter was received and is included in Table 13 below.

Table 13 – RAP response to Stage 2/3 documentation

RAP	Response	Urbis Response
Phil Khan of Kamilaroi- Yankuntjatjara Working Group	<p>19th May 2020</p> <p><i>“Thank you for your report, from the beginning of time Aboriginal People were created around Sydney area and lived in harmony with each other, the land they practised the law & their spirituality beliefs with the creator Biami. They had the best life ever then one day they woke up and all if this had been taken away from them, their way of spiritual beliefs, their laws, their freedom of land ownership, they were the Gadigal People of the Eora Nation. They still live around Sydney as places around the harbour remains important & spiritual & culturally used for fishing, hunting and camping grounds before European settlement as the town of Sydney developed into a City Eora Nation were joined by other Aboriginal People from NSW & across Australia.</i></p> <p><i>Despite the destructive impact of the first contact Gadigal culture survived. So all of this area around former inwards Parcel & Office is highly significant to Aboriginal People of the past & present.”</i></p>	<p>Urbis respects the deep connection the Gadigal people hold for Country which extends to the current subject area.</p> <p>Urbis is recommending archaeological investigation within the subject area to facilitate community engagement with their material past and actively participate on its investigation, understanding and protection.</p> <p>Additionally, the client is working in partnership with Cox Inall Ridgeway (CIR) who is a firm dedicated to increasing opportunities for Aboriginal peoples. CIR believe in using a three staged approach to achieving real change in policy, research or program development. Their approach commences with buy-in and ownership and moves through to the creation of new opportunities for Aboriginal peoples and organisations and ends with a role for service provision. CIR’s model of operation focuses on the individual and the notion of self-reliance opposed to dependence.</p> <p>CIR is currently engaged by the client to undertake ‘Designing with Country’ which will engage with the Local Aboriginal Community, including the RAPs involved for this ACHA, to have meaningful input into the design and interpretation of Aboriginal culture throughout the project.</p>

3.5. STAGE 4: REVIEW OF DRAFT CULTURAL HERITAGE ASSESSMENT REPORT

The aim of Stage 4 is to prepare and finalise an ACHAR with input from registered Aboriginal Parties.

This Draft ACHAR will be provided to all groups who registered, and a minimum 28 days is stipulated for receiving submissions. It is noted that the time allowed for comment should reflect the size and complexity of the project. Submissions may be made in writing, or verbally, and are to be included in the final ACHAR. Responses from the Proponent are also required to be included in a final ACHAR in Appendix C.

Following inclusion of comments from the Aboriginal Parties, the final ACHAR is to be provided to the proponent as part of the required EIS.

4. SUMMARY AND ANALYSIS OF BACKGROUND INFORMATION

4.1. SUMMARY OF BACKGROUND INFORMATION AND RESULTS

Below is a succinct summary following on from the Aboriginal consultation process, desktop research (AHIMS results, archaeological and landscape context, development history of the subject area) and predictive modelling:

- There are no Aboriginal sites registered within the subject area.
- Disturbance resulting from European occupation reduces the potential for intact soil profiles to remain within urban sites. In shallow soils profiles, this is likely to lower archaeological potential.
- Intact natural soils may be encountered in highly developed areas, below European fill. Where intact natural soils are encountered further assessment may be required to assess the archaeological potential. While intact natural soils may be present within urban environments, they may not necessarily contain Aboriginal archaeological objects as landscape factors play a decisive role in Aboriginal utilisation of the land prior to European occupation.
- Dominant site types within the region include artefact scatters and Potential Archaeological Deposit (PAD) sites.
- Despite the high level of disturbance within the subject area there remains the potential for Tuggerah Sands as well as a potential paleo channel to be located within the subject area. These features increase the potential for archaeological deposits (artefacts, middens, burials) to remain within the subject area below the current structures.
- *“Despite the destructive impact of the first contact Gadigal culture survived. So, all of this area around Former Inwards Parcel Office is highly significant to Aboriginal People of the past and present.” – Phil Khan (KYWG)*

5. CULTURAL HERITAGE VALUES AND STATEMENT OF SIGNIFICANCE

Section to be finalised at the close of Stage 4 of Consultation.

5.1. METHODS OF ASSESSING HERITAGE SIGNIFICANCE

Heritage significance is assessed by considering each cultural, or archaeological site, against the significance criteria set out in the Assessment Guidelines. In all cases, the assessment of significance detailed below is informed by the Aboriginal community, which is documented in this report. If any culturally sensitive values were identified they would not be specifically included in the report, or made publicly available, but would be documented and lodged with the knowledge holder providing the information.

5.2. ASSESSMENT FRAMEWORK

The Burra Charter (Australia ICOMOS 1999) defines the basic principles and procedure to be observed in the conservation of important places. It provided the primary framework within which decisions about the management of heritage sites should be made. The Burra Charter defines cultural significance as being derived from the values listed below.

5.2.1. Social or Cultural Value

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 values is how people express their connection with a place and the meaning that place has for them.

Places of social or cultural value have associations with contemporary community identity. These places can have associations with tragic or warmly remembered experiences, periods, or events. Communities can experience a sense of loss should a place of social or cultural value be damaged or destroyed.

There is not always a consensus about a place's social or cultural value. When identifying values, it is not necessary to agree with or acknowledge the validity of each other's values, but it is necessary to document the range of values identified.

Social or cultural values can only be identified through consultation with Aboriginal people. This could involve a range of methodologies, such as cultural mapping, oral histories, archival documentation and specific information provided by Aboriginal people specifically for the investigation.

When recording oral history:

- Identify who was interviewed and why.
- Document the time, place and date the interview was conducted.
- Describe the interview arrangements (the number of people present, recording arrangements, information access arrangements).
- Provide a summary of the information provided to the person being interviewed.
- Summarise the information provided by each person interviewed.

More information on conducting oral history projects can be found in OEH's publication Talking history: oral history guidelines.

Occasionally information about social value may not be forthcoming. In these circumstances, document the consultation process but make it clear in the discussions and conclusions about social value that this was the case.

5.2.2. Historic Value

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.

Places of post-contact Aboriginal history have generally been poorly recognised in investigations of Aboriginal heritage. Consequently, the Aboriginal involvement and contribution to important regional historical themes is often missing from accepted historical narratives. This means it is often necessary to collect oral histories along with archival or documentary research to gain a sufficient understanding of historic values.

5.2.3. Scientific (Archaeological) Value

This 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).

Information about scientific values will be gathered through any archaeological investigation undertaken. Archaeological investigations must be carried out according to OEH's Code of practice for archaeological investigation of Aboriginal objects in NSW.

Scientific significance, also referred to as archaeological significance, is determined by assessing an Aboriginal heritage site or area according to archaeological criteria. The assessment of archaeological significance is used to develop appropriate heritage management and impact mitigation strategies.

Criteria for archaeological significance have been developed in accordance with DPIE guidelines, as shown in Table 14 below.

Table 14 – Scientific (Archaeological) Value

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

5.2.4. Aesthetic Value

This refers to 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).

5.3. IDENTIFYING VALUES

The information collected in the background review of the project can be used to help identify these 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 any identified Aboriginal objects are in this location, along with contemporary uses of the land.

Information gaps are not uncommon and should be acknowledged. They may require further investigation to adequately identify the values present across the subject area. It may be helpful to prepare a preliminary values map that identifies, to the extent of information available, the:

- Known places of social, spiritual, cultural value, including natural resources of significance.

- Known historic places.
- Known Aboriginal objects and/or declared Aboriginal places.
- Potential places/areas of social, spiritual, cultural value, including natural resources, historic or archaeological significance.
- Places of potential value that are not fully identified or defined should be included as 'sensitive' areas to target further investigation.

5.4. ASSESSING VALUES AND SIGNIFICANCE

This stage is used to assess and discuss the cultural significance of the values identified during the identification and assessment of cultural significance by consulting Aboriginal people and to prepare a statement of significance. The assessment of values is a discussion of what is significant and why. An assessment of values is more than simply restating the evidence collected during the background review and identification of values stages of the project. Rather, the assessment should lead to a statement of significance that sets out a succinct summary of the salient values that have been identified.

The assessment and justification in the statement of significance must discuss whether any value meets the following criteria (NSW Heritage Office 2001):

- Does the subject area have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons? – social value.
- Is the subject area important to the cultural or natural history of the local area and/or region and/or state? – historic value.
- Does the subject area have potential to yield information that will contribute to an understanding of the cultural or natural history of the local area and/or region and/or state? – scientific (archaeological) value.
- Is the subject area important in demonstrating aesthetic characteristics in the local area and/or region and/or state? – aesthetic value.
- Assessment of each of the criteria (above) should be graded in terms that allow the significance to be described and compared; for example, as high, moderate, or low. In applying these criteria, consideration should be given to:
- Research potential: does the evidence suggest any potential to contribute to an understanding of the area and/or region and/or state's natural and cultural history?
- Representativeness: how much variability (outside and/or inside the subject area) exists, what is already conserved, how much connectivity is there?
- Rarity: is the subject area important in demonstrating a distinctive way of life, custom, process, land-use, function or design no longer practised? Is it in danger of being lost or of exceptional interest?
- Education potential: does the subject area contain teaching sites or sites that might have teaching potential?

Then discuss what is significance and why – this should be summarised into a statement of significance. Thus, the statement of significance is a succinct summary of the salient values drawn from the identification of values.

5.4.1. Assessment of Cultural Heritage Significance and Values

An assessment of cultural heritage significance and values incorporates a range of values which may vary for different individual groups and may relate to both the natural and cultural characteristics of places or sites. Cultural significance and Aboriginal cultural views can only be determined by the Aboriginal community using their own knowledge of the area and any sites present, and their own value system. All Aboriginal heritage evidence tends to have some contemporary significance to Aboriginal people, because it represents an important tangible link to their past and to the landscape.

Consultation with members of the local Aboriginal community (project RAPs) was undertaken to identify the level of spiritual/cultural significance of the subject area and its components. In acknowledgment that the Aboriginal community themselves are in the best position to identify levels of cultural significance, the project

RAPs were invited to provide comment and input into this ACHAR and to the assessment of cultural heritage significance and values presented therein.

Comment was received from Phil Khan of Kamilaroi-Yankuntjatjara Working Group on 19th May 2020

"Thank you for your report, from the beginning of time Aboriginal People were created around Sydney area and lived in harmony with each other, the land they practised the law and their spirituality beliefs with the creator Biambi. They had the best life ever then one day they woke up and all of this had been taken away from them, their way of spiritual beliefs, their laws, their freedom of land ownership, they were the Gadigal People of the Eora Nation. They still live around Sydney as places around the harbour remains important & spiritual and culturally used for fishing, hunting and camping grounds before European settlement as the town of Sydney developed into a City Eora Nation were joined by other Aboriginal People from NSW and across Australia.

Despite the destructive impact of the first contact Gadigal culture survived. So all of this area around Former Inwards Parcels Office is highly significant to Aboriginal People of the past and present."

The utilisation of the subject area for the Benevolent Asylum indicates that there exists potential for contact archaeological deposits associated with this period of use.

Based on the consultation undertaken for this ACHAR it is considered that the subject area represents a moderate to highly culturally significant portion of the wider cultural landscape associated with the Gadigal people.

5.4.2. Assessment of Scientific (Archaeological) Significance

In accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, and in consultation with representatives of the local Aboriginal community, the following assessment of the scientific (archaeological) significance of identified sites within the subject area has been prepared.

This assessment has determined that there Aboriginal objects have been identified in proximity to the subject area as well as within the Tuggerah Soil Landscape. Furthermore, as a result of the geotechnical investigation that indicates the potential presence of a paleochannel within the southern portion of the subject area there is moderate potential for subsurface archaeological material to remain within the subject area. The utilisation of the subject area for the Benevolent Asylum indicates that there exists potential for contact archaeological deposits associated with this period of use.

It is determined by this ACHAR that the subject area contains moderate archaeological potential for subsurface Aboriginal archaeological deposits with moderate to high associated scientific significance.

6. IMPACT ASSESSMENT

The proposal seeks consent for a new Railway Square YHA and head office for Australian enterprise software company, Atlassian. The establishment of the Atlassian head office at Railway Square is to anchor the creation of a new technology and innovation precinct which will attract and retain global talent in this industry.

The final details of the proposal are yet to be confirmed; however, the current design indicates that the maximum height of the building is to be approximately 200m above ground level, and two basement levels will be excavated, with a combined depth of approximately 10m. The construction of the high-rise will require the deconstruction of the Former Inwards Parcels Office; after the excavation of the basement levels, the structure will be reconstructed. A detailed methodology for dismantling and storage of the Parcels Shed has been prepared by the Traditional Restoration Company, to ensure that the building is reconstructed without damage or a loss of original fabric (Weir Phillips Heritage and Planning, 2013: 51). Once the Shed is reconstructed, there will be a 12m separation between the apex of the shed roof and the bulk of the tower above, to mitigate the impact on the identified aesthetic values (Weir Phillips Heritage and Planning, 2013: 51).

The design includes provision of two basement levels beneath the Parcels Office, which will remove any archaeological resources that may be present within the project footprint.

This assessment has established that the current subject area does not contain any previously identified Aboriginal sites.

The geotechnical investigation undertaken to date for the subject area (Arcadis - Geotechnical Desktop Study & Risk Assessment, Tech Central Development, Lee Street, Sydney - 2018) indicates the likelihood of a paleochannel existing within the central and southern portions of the subject area. The geotechnical report states (Arcadis 2018, p,18):

The subsurface ground conditions at the south-east end of the site are expected to comprise fill, sand and residual soils to approximately 10 m depth overlying sandstone bedrock. It is understood the source of sand at the south-east corner is part of a historic paleochannel/ deposit aligned in an east-west direction. The alluvial channel/ deposit is anticipated to be about 100 m wide and likely to spread across the centre and the southern end of the site.

6.1. POTENTIAL HARM

This section identifies the potential impacts to cultural heritage arising from the proposal, including demolition, excavation, and construction phases. Harm can be direct or indirect, defined by the Assessment Guidelines as:

- Direct harm – may occur as the result of any activity which disturbs the ground including, but not limited to, site preparation activities, installation of services and infrastructure, roadworks, excavation, flood mitigation measures.
- Indirect harm – may affect sites or features located immediately beyond or within the area of the proposed activity. Examples include, but are not limited to, increased impact on art in a shelter from increased visitation, destruction from increased erosion and changes in access to wild food resources.

The nature, extent and level of harm (indirect or direct) cannot be identified at this stage due to the lack of sufficient information on the presence or absence of Aboriginal objects and archaeological resources within the subject area. This ACHA has concluded that there is potential for Aboriginal objects in a subsurface context, given the subject area is situated within a sensitive soil landscape (Tuggerah). However, should Aboriginal archaeological resources found within the subject area, the proposed development will have direct impact on those resources and potentially remove the archaeological resource completely.

The level, nature and extent of potential harm cannot be ascertained until the results of detailed geomorphological investigation are provided to Urbis and archaeological excavation is undertaken (either following the approval of the SSDA or prior to an SSDA approval under an approved AHIP). This level of investigation can only be undertaken concurrent with historical archaeological investigations (similarly, either following the approval of the SSDA or prior to an SSDA approval under an approved Section 60).

6.2. LIKELY IMPACTED VALUES

The level of archaeological potential of subsurface Aboriginal objects and archaeological resources that still may exist within the subject area can only be further assessed by archaeological test excavation. Any potential Aboriginal objects and/or sites will occur below the current level of historical disturbance.

These potential Aboriginal objects and/or sites may represent various scale camping events and Aboriginal utilisation of the land in the form of hearth, stone artefacts and shells. Previous archaeological investigations within Eastern Sydney sand dune systems have identified the potential for human burials as well.

6.3. JUSTIFICATION

The principle of inter-generational equity holds that the present generation should make every effort to ensure the health, diversity and productivity of the environment – which includes cultural heritage – is available for the benefit of future generations.

As the ACHA identified that further investigation is needed in the form of subsurface archaeological test excavation, the principles of the ESD can only be partially assessed at this stage and further information will be provided following the archaeological test excavation.

7. AVOIDING AND MINIMISING HARM

The nature, extent and level of harm (indirect or direct) cannot be identified at this stage due to the lack of sufficient information on the presence or absence of Aboriginal objects and archaeological resources within the subject area. The ACHA concluded that there is potential for subsurface Aboriginal objects and archaeological resources within the underlying soil landscape and recommends additional investigation in the form of archaeological test excavations. This test excavation is to establish the presence/absence and extent of subsurface archaeological resources that may be present within the subject area.

The nature and complexity of mitigation measures to avoid and/or minimise harm to any Aboriginal objects and archaeological resources that might be identified will be provided in context of the nature, extent and significance of those resources.

8. CONCLUSIONS

Urbis Pty Ltd (Urbis) was commissioned by Atlassian Pty Ltd (the proponent) to produce an Aboriginal Cultural Heritage Assessment Report (ACHAR) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) for the State Significant Development (SSD 10405). This ACHA will accompany an Environmental Impact Statement (EIS) for the redevelopment of the Former Inwards Parcel Office (YHA Railway Square) This ACHA was prepared in accordance with the following guidelines:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Department of Environment, Climate Change and Water (DECCW), 2010) (the Consultation Guidelines).
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage 2011) (the Assessment Guidelines).
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010).
- *The Australia ICOMOS Charter for Places of Cultural Significance, The Burra Charter, 2013* (Burra Charter).

The study area is located within Lot 116 DP1078271, Lot 117 DP1078271, Lot 118 DP1078271 and Lot 13 DP1062447 at 8-10 Lee Street, Sydney within Railway Square. The subject area is within the City of Sydney Council Local Government Area (LGA). The subject area is within the Western Gateway Sub-precinct of the Central Precinct State Significant Precinct (Central SSP), which was designated in July 2019.

The subject area covers approx. 3700m² and is bound by Ambulance Avenue to the north, Lee Street to the west, Henry Deane Plaza to the south and Central Station CountryLink platforms to the east. The subject area is currently owned by Transport for NSW and is occupied by YHA Australia Ltd. The upper level of the Former Inwards Parcels Office is occupied by the Sydney Central YHA while the lower level contains workshops associated with CountryLink services, waste disposal and amenities.

The development is proposed to accommodate a new Railway Square YHA and head office for Australian enterprise software company, Atlassian. The establishment of the Atlassian head office at Railway Square is to anchor the creation of a new technology and innovation precinct which will attract and retain global talent in this industry (see Figure 4).

The ACHAR conducted for the subject area concluded that:

- There are no Aboriginal sites registered within the subject area.
- Disturbance resulting from European occupation reduces the potential for intact soil profiles to remain within urban sites. In shallow soils profiles, this is likely to lower archaeological potential.
- Intact natural soils may be encountered in highly developed areas, below European fill. Where intact natural soils are encountered further assessment may be required to assess the archaeological potential. While intact natural soils may be present within urban environments, they may not necessarily contain Aboriginal archaeological objects as landscape factors play a decisive role in Aboriginal utilisation of the land prior to European occupation.
- Dominant site types within the region include artefact scatters and Potential Archaeological Deposit (PAD) sites.
- Despite the high level of disturbance within the subject area there remains the potential for sand deposits associated with the Tuggerah Soil Landscape as well as a potential paleo channel to be located within the subject area. These features increase the potential for archaeological deposits (artefacts, middens, burials) to remain within the subject area below the current structures.
- Feedback gathered during the Consultation process identified the following: "*Despite the destructive impact of the first contact Gadigal culture survived. So, all of this area around Former Inwards Parcel Office is highly significant to Aboriginal People of the past and present.*" – Phil Khan (KYWG)
- The supplementary geotechnical investigation conducted by Douglas Partners (2020) concluded that across the subject area there is present 2-8m of fill material (which includes sand) over a discontinuous lens of loose to very loose sand alluvium up to 2m thick. These results confirm the assumptions made by Urbis in this assessment that Tuggerah Sands may occur within the subject area below the modern development. These sands contain moderate archaeological potential for

subsurface artefact deposits and require further detailed investigation in the form of test excavation. Test excavation will mitigate the associated risk of impacting potential archaeological deposits.

9. RECOMMENDATIONS

Based on the conclusions of this assessment the proposed activity can proceed under the following recommendations:

Recommendation 1 – Archaeological Test Excavation

An Archaeological Research Design (ARD) and Methodology should be prepared for the sub-surface investigation of the identified landscape features and their potential for retaining Aboriginal objects and archaeological resources. The purpose of the archaeological test excavation is to confirm the presence or absence and potential extent of Aboriginal objects and archaeological resources within the subject area.

The archaeological test excavation must be undertaken according to the developed ARD and with the participation of the nominated Aboriginal RAPs and appropriately qualified archaeologists. The ARD must be developed in line with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010) (the Code of Practice).

NOTE: The timing of the recommended test excavations is yet to be determined by the proponent. If the test excavations are to occur prior to the approval of SSD-10405 then they must be undertaken following an approved Aboriginal Heritage Impact Permit (AHIP) and in conjunction with an approved Section 60 required for associated historical archaeological investigations.

The results of the test excavations must be incorporated into the ACHAR or addendum document and supplied to the project RAPs for comment in accordance with *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Department of Environment, Climate Change and Water (DECCW), 2010) (the Consultation Guidelines).

Recommendation 2 – Aboriginal Cultural Heritage Induction

It is recommended that induction materials be prepared for inclusion in site inductions for any contractors working at the subject area. The induction material should include an overview of the types of sites to be aware of (i.e. artefact scatters or concentrations of shells that could be middens), obligations under the NPW Act, and the requirements of an archaeological finds' procedure (refer below). This should be prepared for the project and included in any site management plans.

The induction material may be paper based, included in any hard copy site management documents; or electronic, such as "PowerPoint" for any face to face site inductions.

Recommendation 3 – Archaeological Chance Find Procedure

Should any archaeological deposits be uncovered during any site works, a procedure must be implemented. The following steps must be carried out:

1. All works stop in the vicinity of the find. The find must not be moved 'out of the way' without assessment.
2. Site supervisor, or another nominated site representative must contact either the project archaeologist (if relevant) or DPIE to contact a suitably qualified archaeologist.
3. The nominated archaeologist examines the find, provides a preliminary assessment of significance, records the item and decides on appropriate management, in conjunction with the RAPs for the project. Such management may require further consultation with DPIE, preparation of a research design and archaeological investigation/salvage methodology and preparation of AHIMS Site Card.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required, and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies. Any such documentation should be appended to this ACHAR and revised accordingly.
6. Works in the vicinity of the find can only recommence upon relevant approvals from DPIE.

Recommendation 4 – Human Remains Procedure

In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

1. All works within the vicinity of the find immediately stop.
2. Site supervisor or other nominated manager must notify the NSW Police and DPIE.
3. The find must be assessed by the NSW Police, and may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the Police, DPIE and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

Recommendation 5 – RAP consultation

A copy of the final ACHA must be provided to all Project RAPs. Ongoing consultation with RAPs should occur as the project progresses, to ensure ongoing communication about the project and key milestones, and to ensure the consultation process does not lapse, particularly with regard to consultation should the CFP be enacted.

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DISCLAIMER

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In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment.

All surveys, forecasts, projections and recommendations contained in or associated with this report are made in good faith and on the basis of information supplied to Urbis at the date of this report, and upon which Urbis relied. Achievement of the projections and budgets set out in this report will depend, among other things, on the actions of others over which Urbis has no control.

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

APPENDIX A **AHIMS EXTENSIVE SEARCH RESULTS**

Urbis Pty Ltd - 201 Sussex St Sydney
Level 23 Tower 2, 201 Sussex Street Sydney
Sydney New South Wales 2000
Attention: Meggan Walker
Email: mwalker@urbis.com.au

Date: 17 February 2020

Dear Sir or Madam:

AHIMS Web Service search for the following area at Datum :GDA, Zone : 56, Eastings : 329973 - 337973, Northings : 6245269 - 6253269 with a Buffer of 0 meters, conducted by Meggan Walker on 17 February 2020.

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:

78	Aboriginal sites are recorded in or near the above location.
0	Aboriginal places have been declared in or near the above location. *

If your search shows Aboriginal sites or places what should you do?

- You must do an extensive search if AHIMS has shown that there are Aboriginal sites or places recorded in the search area.
- If you are checking AHIMS as a part of your due diligence, refer to the next steps of the Due Diligence Code of practice.
- You can get further information about Aboriginal places by looking at the gazettal notice that declared it. Aboriginal places gazetted after 2001 are available on the [NSW Government Gazette \(http://www.nsw.gov.au/gazette\)](http://www.nsw.gov.au/gazette) website. Gazettal notices published prior to 2001 can be obtained from Office of Environment and Heritage's Aboriginal Heritage Information Unit upon request

Important information about your AHIMS search

- The information derived from the AHIMS search is only to be used for the purpose for which it was requested. It is not to be made available to the public.
- AHIMS records information about Aboriginal sites that have been provided to Office of Environment and Heritage and Aboriginal places that have been declared by the Minister;
- Information recorded on AHIMS may vary in its accuracy and may not be up to date. Location details are recorded as grid references and it is important to note that there may be errors or omissions in these recordings,
- Some parts of New South Wales have not been investigated in detail and there may be fewer records of Aboriginal sites in those areas. These areas may contain Aboriginal sites which are not recorded on AHIMS.
- Aboriginal objects are protected under the National Parks and Wildlife Act 1974 even if they are not recorded as a site on AHIMS.
- This search can form part of your due diligence and remains valid for 12 months.

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Atlassian 4km

Client Service ID : 484505

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
45-6-2597	Wynyard St Midden	AGD	56	333469	6247920	Open site	Valid	Shell : -, Artefact : -	Midden	102494,10276 3,102765
	<u>Contact</u>									
45-6-2382	Goat Island 2	AGD	56	333100	6252480	Closed site	Valid	Artefact : -, Shell : -, Aboriginal Ceremony and Dreaming : -		
	<u>Contact</u>									
45-6-2278	Lilyfield Cave	AGD	56	330310	6250290	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	102201
	<u>Contact</u>									
45-6-2299	First Government House	GDA	56	334612	6251612	Open site	Valid	Burial : -, Aboriginal Ceremony and Dreaming : -, Artefact :-	Burial/s,Historic Place	102494,10276 3,102765
	<u>Contact</u>									
45-6-2651	William St PAD	AGD	56	334800	6250220	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	<u>Contact</u>									
45-6-2647	KENS Site 1	AGD	56	333750	6250785	Open site	Valid	Artefact : -, Potential Archaeological Deposit (PAD) : -		99857,100494, 102494,10276 3,102765
	<u>Contact</u>									
45-6-2676	Johnstons Creek	AGD	56	331100	6249100	Closed site	Valid	Art (Pigment or Engraved) : 2, Artefact : 5		102142,10276 3
	<u>Contact</u>									
45-6-2666	Wattle Street PAD 1	AGD	56	333150	6249450	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	<u>Contact</u>									
45-6-2663	Mountain Street Ultimo	AGD	56	333300	6249400	Open site	Valid	Artefact : -, Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	<u>Contact</u>									
45-6-2680	Broadway Picture Theatre PAD 1	AGD	56	333150	6249000	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102142,10249 4,102763,1027 65
	<u>Contact</u>									

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Atlassian 4km

Client Service ID : 484505

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
45-6-2838	420 George Street PAD	AGD	56	334080	6250670	Open site	Not a Site	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	Contact	Recorders	Doctor.Tim Owen					Permits	2654	
45-6-2960	Jackson Landing Shelter	GDA	56	332442	6250870	Closed site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	Contact	Recorders	Mary Dallas Consulting Archaeologists (MDCA),Mr.Paul Irish					Permits		
45-6-2979	UTS PAD 1 14-28 Ultimo Rd Syd	GDA	56	333650	6249590	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	Contact	Recorders	Dominic Steele Archaeological Consulting,Mr.Dominic Steele					Permits	3458	
45-6-3727	POWH-ASB-HTH	GDA	56	337029	6245641	Open site	Valid	Hearth : -		
	Contact	Recorders	Mary Dallas Consulting Archaeologists (MDCA),Ms.Lucinda O'Connor					Permits		
45-6-3728	UNSW B22 Area of Sensitivity	GDA	56	336715	6245720	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	Ms.Fenella Atkinson,Coast History & Heritage					Permits		
45-6-3729	UNSW Sand Body Area of Sensitivity	GDA	56	336190	6245480	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	Ms.Fenella Atkinson,Coast History & Heritage					Permits	4568	
45-6-3704	Tay Reserve Artefact	GDA	56	335723	6247268	Open site	Valid	Artefact : -		
	Contact	Recorders	Artefact - Cultural Heritage Management ,Mr.Michael Lever					Permits		
45-6-3705	Kent and Erskine St PAD	GDA	56	333876	6251145	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	GML Heritage Pty Ltd + Context - Surry Hills,Ms.Jodi Cameron					Permits		
45-6-3693	Callan Park Scared Tree	GDA	56	330004	6251406	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	Contact	Recorders	GML Heritage Pty Ltd + Context - Surry Hills,Doctor.Tim Owen					Permits		
45-6-3694	Callan Park Waterhole	GDA	56	330060	6251377	Open site	Valid	Water Hole : -		
	Contact	Recorders	GML Heritage Pty Ltd + Context - Surry Hills,Doctor.Tim Owen					Permits		
45-6-3695	Callan Park Grinding Groove (possible)	GDA	56	330080	6251407	Open site	Valid	Grinding Groove : -		
	Contact	Recorders	GML Heritage Pty Ltd + Context - Surry Hills,Doctor.Tim Owen					Permits		
45-6-3696	Callan Park Cultural Tree	GDA	56	330061	6251398	Open site	Valid	Aboriginal Resource and Gathering : -		
	Contact	Recorders	GML Heritage Pty Ltd + Context - Surry Hills,Doctor.Tim Owen					Permits		

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Atlassian 4km

Client Service ID : 484505

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
45-6-3762	Harrington IFS01	GDA	56	334178	6251888	Open site	Valid	Artefact : 1		
	Contact	Recorders						Permits		
45-6-0519	Moores Wharf	AGD	56	333600	6252200	Open site	Valid	Artefact : -	Open Camp Site	808
	Contact	Recorders						Permits		
45-6-2062	Bradleys Beach	AGD	56	337762	6252708	Open site	Valid	Shell : -, Artefact : -	Midden,Open Camp Site	1809,1895,2025
	Contact	Recorders						Permits		
45-6-1268	Balls Head Reserve;	AGD	56	333800	6253060	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
45-6-1900	White Horse Pt.	AGD	56	330800	6252420	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
45-6-1901	Long Nose Point 1.;Birchgrove;9 Numa Street;	AGD	56	332000	6253030	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
45-6-1481	Rozelle Hospital 3	AGD	56	329902	6251129	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
45-6-2208	Bradleys Beach rock shelter	AGD	56	337751	6252663	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	1895,2025
	Contact	Recorders						Permits		
45-6-0647	Centennial Park	AGD	56	336273	6247961	Open site	Valid	Art (Pigment or Engraved) : -	Rock Engraving	
	Contact	Recorders						Permits		
45-6-2495	Prince of Wales Hospital Aboriginal;Hearth;	AGD	56	337040	6245140	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits		
45-6-2580	Junction Lane	AGD	56	335070	6250410	Open site	Valid	Artefact : -	Open Camp Site	102494,102763,102765
	Contact	Recorders						Permits		
45-6-2581	Angel Place	AGD	56	334400	6251100	Open site	Valid	Artefact : -	Open Camp Site	97963,102494,102763,102765
	Contact	Recorders						Permits		
45-6-2168	RSYS midden;	AGD	56	335190	6253050	Open site	Valid	Artefact : -, Shell : -	Midden,Open Camp Site	
	Contact	Recorders						Permits		
45-6-2042	Ashton park	AGD	56	337730	6252728	Open site	Valid	Art (Pigment or Engraved) : -	Rock Engraving	1809,1895,2025
	Contact	Recorders						Permits		
45-6-1939	MSB Tower;	GDA	56	333640	6252227	Open site	Destroyed	Art (Pigment or Engraved) : -	Rock Engraving	102763

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Atlassian 4km

Client Service ID : 484505

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-0751	Shea's Creek Dugong	GDA	56	331839	6245378	Open site	Destroyed	Artefact : -, Aboriginal Resource and Gathering : -, Non-Human Bone and Organic Material :-	Open Camp Site	
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-1615	Bennelong Point	AGD	56	334800	6252100	Open site	Destroyed	Shell : -, Artefact : -	Midden	102763
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-1496	Shea's Creek	AGD	56	331697	6245597	Open site	Not a Site	Shell : -, Artefact : -	Midden	30,591,940
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-1957	Goat Island Cave;	AGD	56	333010	6252710	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-1809	Birchgrove	AGD	56	331380	6252700	Closed site	Valid	Shell : -, Artefact : -, Art (Pigment or Engraved) : -	Midden,Shelter with Art	
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-1853	Lilyvale	AGD	56	333950	6251600	Open site	Valid	Shell : -, Artefact : -	Midden	102763
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-0030	Dawes Point;Dawes Point Park;	GDA	56	334345	6252534	Open site	Destroyed	Art (Pigment or Engraved) : -	Rock Engraving	
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-2652	Ultimo PAD 1	AGD	56	333450	6250000	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>	1598	
45-6-2654	Fraser Park PAD	AGD	56	330100	6245800	Open site	Valid	Potential Archaeological Deposit (PAD) : -		98669,104256, 104257
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>	1639	
45-6-2687	Crown Street PAD 1	AGD	56	334950	6250300	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>	2017	
45-6-2742	171-193 Gloucester Street PAD	AGD	56	333926	6251461	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102763

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Atlassian 4km

Client Service ID : 484505

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
	<u>Contact</u>	<u>Recorders</u>	Jim Wheeler					<u>Permits</u>	2143,2342,2766	
45-6-2745	University of Sydney Law Building PAD	AGD	56	332350	6248740	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102201,10249 4,102763,1027 65
	<u>Contact</u>	<u>Recorders</u>	Doctor.Jo McDonald					<u>Permits</u>	2153,2320,2443	
45-6-2934	Yurong Cave	GDA	56	335595	6251900	Closed site	Valid	Art (Pigment or Engraved) : -		102763
	<u>Contact</u>	<u>Recorders</u>	Michael Guider,Mr.Paul Irish					<u>Permits</u>		
45-6-2935	Yurong 1	GDA	56	335555	6252020	Open site	Valid	Shell : 6		
	<u>Contact</u>	<u>Recorders</u>	Michael Guider,Mr.Paul Irish					<u>Permits</u>		
45-6-3071	445-473 Wattle Street PAD	GDA	56	333285	6249412	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		
	<u>Contact</u>	<u>Recorders</u>	Biosis Pty Ltd - Sydney					<u>Permits</u>		
45-6-3081	200 George Street	GDA	56	334237	6251637	Open site	Not a Site	Potential Archaeological Deposit (PAD) : 1		103114
	<u>Contact</u>	<u>Recorders</u>	Ms.Sally MacLennan					<u>Permits</u>	3577,3934,4239	
45-6-2987	Poultry Market 1	GDA	56	333746	6249575	Open site	Valid	Artefact : 1		102494,10276 3
	<u>Contact</u>	<u>Recorders</u>	Ms.Samantha Higgs,Biosis Pty Ltd - Canberra					<u>Permits</u>	3506	
45-6-3064	445-473 WATTLE ST PAD	GDA	56	333285	6249412	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		102763
	<u>Contact</u>	<u>Recorders</u>	Biosis Pty Ltd - Sydney					<u>Permits</u>		
45-6-3155	Moore Park AS1	GDA	56	335613	6247909	Open site	Valid	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	Artefact - Cultural Heritage Management ,Artefact - Cultural Heritage Management					<u>Permits</u>	4019	
45-6-3502	Loftus PAD 01	GDA	56	334551	6251635	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	Artefact - Cultural Heritage Management ,Artefact - Cultural Heritage Management					<u>Permits</u>	4292	
45-6-3645	SFS-PAD	GDA	56	335846	6248721	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		
	<u>Contact</u>	<u>Recorders</u>	Miss.Sam Cooling,Curio Projects Pty Ltd					<u>Permits</u>		
45-6-3552	Smith Hogan and Spindlers Park Midden	GDA	56	331309	6249791	Open site	Not a Site	Shell : -, Burial : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Mark Simon					<u>Permits</u>		
45-6-3654	CRS AS 01 (Central Railway Station Artefact scatter 01)	GDA	56	334055	6249146	Open site	Valid	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	Artefact - Cultural Heritage Management ,Ms.Jennifer Norfolk					<u>Permits</u>		

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Atlassian 4km

Client Service ID : 484505

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
45-6-3446	71 Macquarie Street PAD	GDA	56	334663	6251783	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	GML Heritage Pty Ltd + Context - Surry Hills,Ms.Jodi Cameron					Permits	4285	
45-6-2629	Broadway 1	AGD	56	333060	6249100	Open site	Valid	Artefact : -		102494,10276 3,102765
	Contact	Recorders	Dominic Steele Archaeological Consulting					Permits	1299	
45-6-2637	George street 1	AGD	56	333860	6249880	Open site	Valid	Artefact : -		98238,102494, 102763,10276 5
	Contact	Recorders	Dominic Steele Archaeological Consulting					Permits	1369	
45-6-0811	Goat Island;Parramatta River;	AGD	56	333150	6252650	Open site	Valid	Artefact : -, Shell : -	Midden,Open Camp Site	
	Contact	Recorders	Elizabeth Rich					Permits		
45-6-2783	PAD Central Royal Botanic Gardens	AGD	56	334900	6251030	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	Contact T Russell	Recorders	Haglund and Associates					Permits	2364	
45-6-2767	Tent Embassy	AGD	56	332680	6248680	Open site	Valid	Aboriginal Resource and Gathering : 1		102494,10276 3,102765
	Contact T Russell	Recorders	Bill Lord					Permits		
45-6-2796	320-328 George St PAD	AGD	56	334100	6251050	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	Contact T Russell	Recorders	Mr.Dominic Steele					Permits	2415	
45-6-2822	USYD: Central	AGD	56	332750	6248550	Open site	Valid	Artefact : -		100302,10249 4,102763,1027 65
	Contact	Recorders	Jo McDonald Cultural Heritage Management see GML					Permits	2554	
45-6-3152	168-190 Day Street, Sydney PAD	GDA	56	333877	6250257	Open site	Not a Site	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	Mr.Josh Symons,Mr.Alex Timms					Permits	3789	
45-6-3116	Wynyard Walk PAD	GDA	56	333931	6251252	Open site	Destroyed	Potential Archaeological Deposit (PAD) : 1		
	Contact	Recorders	GML Heritage Pty Ltd + Context - Surry Hills,GML Heritage Pty Ltd + Context - Surry					Permits	3670	
45-6-3217	Darling Central Midden	GDA	56	333530	6250101	Open site	Valid	Aboriginal Ceremony and Dreaming : 1, Artefact : 1, Shell : 1		

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Atlassian 4km

Client Service ID : 484505

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-3324	RBG PAD 1	GDA	56	334802	6251224	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-3325	RBG PAD 2	GDA	56	335212	6251494	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-3327	RBG PAD 3	GDA	56	334957	6251832	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-3245	Doncaster Ave PAD	GDA	56	336037	6246916	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>	4188	
45-6-3246	RSY 1	GDA	56	336060	6246862	Open site	Valid	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>	4188	
45-6-3338	The Bays Precinct PAD02	GDA	56	332354	6250885	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		
45-6-3339	The Bays Precinct PAD01	GDA	56	332779	6250555	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>						<u>Permits</u>		

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APPENDIX B **GEOTECHNICAL REPORTS**

APPENDIX C **CONSULTATION DOCUMENTS**



Appendix shall be included at completion of Stage 4 of Consultation.

APPENDIX D **CONSULTATION LOG**



Appendix shall be included at completion of Stage 4 of Consultation.

