

# **Greenwich Hospital, Updated Aboriginal Archaeological Impact Assessment and Consultation**

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**Report Prepared for  
HammondCare  
Level 2, 447 Kent St  
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**LGA: Lane Cove**



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## EXECUTIVE SUMMARY

Cultural Heritage Connections Pty Ltd (CHC) was commissioned by HammondCare in May 2018 to undertake an Aboriginal Cultural Heritage Assessment Report (ACHAR) for a proposed redevelopment of Greenwich Hospital. Greenwich Hospital is located at 97 – 115 River Road, Greenwich, NSW. The proposed redevelopment has been designed to increase the service potential and amenity of the site.

The concept design for the project and the ACHAR were assessed and approved under State Significant Development (SSD) 8699. The Development Consent, issued for the concept design phase (SSD-8699) included requirements for updated assessments for subsequent development application phases.

CHC was commissioned by HammondCare in July 2021 to undertake a revised archaeological impact assessment for the detailed design and construction phase of the proposed development being assessed as SSD-136119238.

This revised report includes a consideration of the potential impacts of the detailed design and an update to the consultation previously undertaken. The report has been developed to meet the requirements of the conditions of consent for the concept proposal as well as the following:

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011);
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b); and
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010a).

No Aboriginal objects have been recorded within the project area. No declared Aboriginal Place is located within the project area. The project area has not been subject of any previous Aboriginal Heritage Impact Permit (AHIP). Archaeological assessment found that there is some archaeological potential within a portion of the project impact area.

The recommendations of the previous ACHAR approved under SSD-8699 are included in Section 8.1 and referred to below:

The following recommendations were formulated as a result of this revised assessment:

- 1) The recommendations from the ACHAR (CHC 2018), 2a, 3 & 4 should be incorporated into the ACHMP being prepared for the Greenwich Hospital Site.
- 2) The recommendation from the ACHAR (CHC 2018), 2c should be addressed in the interpretation plan being prepared for the Greenwich Hospital Site.
- 3) Input should be sought from the RAPs regarding the appropriate interpretation of cultural values to be included within the interpretation plan. Where possible, consideration should be given to opportunities for Aboriginal owned organisations or individuals creating content for any interpretive material and providing ongoing maintenance services. For example, art work from local Aboriginal artists or maintenance of bush tucker gardens etc.

- 4) A methodology and research design for sub-surface archaeological testing in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW. Part 6 National Parks and Wildlife Act 1974* has been prepared and is included in . RAPs have 28 days to review the methodology along with this revised report.
- 5) Findings of the testing undertaken under the methodology described in item 4, should be incorporated into the ACHMP and be used to inform the mitigation measures during construction and ongoing management of Aboriginal Cultural Heritage at the Greenwich Hospital site.

## 1.0 INTRODUCTION

Cultural Heritage Connections Pty Ltd (CHC) was commissioned by HammondCare in July 2021 to undertake a revised archaeological impact assessment for the detailed design and construction phase for the redevelopment of Greenwich Hospital, at 97-115 River Road, Greenwich.

CHC previously (2018) prepared an Aboriginal Cultural Heritage Assessment Report (ACHAR), including an Archaeological Technical Report (ATR) for the Greenwich Hospital site during the prior concept design phase. CHC was subsequently engaged to revise the impact assessment in line with previous and current SSD requirements to form part of an EIS for the detailed design and construction phase of the project.

This updated Aboriginal archaeological assessment is submitted to the Department of Planning, Industry and Environment (DPIE) in support of a State Significant Development Application (SSD-13619238) for the redevelopment of Greenwich Hospital into an integrated hospital and seniors living facility on land identified as 97-115 River Road, Greenwich (the site). The extent of the site is shown in Figure 1 and the current site layout in Figure 2.

The Development Consent, issued for the concept design phase (SSD 8699) included the following conditions:

*B13. All future development applications for new built form must demonstrate how the archaeological significance on the Site has been avoided and the impacts the development may have on this significance. This assessment must consider both Aboriginal and non-Aboriginal archaeological impacts.*

In accordance with section 4.39 of the Environmental Planning & Assessment Act 1979 (EP&A Act), the Secretary's Environmental Assessment Requirements (SEARs) for SSD-13619238 were issued on 24 February, 2021. This document has been prepared to respond to the following SEARs:

<b>SEAR</b>	<b>Relevant section of report</b>
<i>Aboriginal Cultural Heritage</i>  Demonstrate that the recommendations of the Aboriginal Cultural Heritage Assessment Report approved under SSD-8699 have been addressed in the proposed development.	<b><i>This entire report addresses Condition B13 of the SSD-8699 approval. Detailed information relating to the ACHAR recommendations is presented in Section 8.1</i></b>

The recommendations of the previous ACHAR approved under SSD-8699 are included in Section 8.1. This report also details the updates undertaken for the Aboriginal community consultation for the project.

The subject proposal is for the detailed design and construction of the facility following its concept approval under SSD-8699. Specifically, SSD-13619238 seeks approval for the following:

- Demolition of the existing hospital building and associated facilities at the site;
- Construction of a new hospital facility and integrated healthcare campus comprising of hospital, residential aged care, seniors housing, overnight respite, across:

- A new main hospital building up to RL 80.0;
- Two new seniors living buildings, Northern building up to RL 56.36, and Southern building up to RL 60.65;
- A new respite care building up to RL 56.9;
- Construction of associated site facilities and services, including pedestrian and vehicular access and basement parking;
- Site landscaping and infrastructure works; and
- Preservation of Pallister House which will continue to host dementia care and administrative functions.

**Figure 1: Project area extent**



## 1.1 PROJECT AREA & PROJECT CONTEXT

Greenwich Hospital is located at 97 – 115 River Road, Greenwich, also known as Lot 3 and Lot 4 DP 584287. The subject site is zoned SP2 Infrastructure (Health Service Facilities) under Lane Cove Local Environmental Plan 2009 (LEP). The site is roughly rectangular in shape and incorporates an area of approximately 3.4 hectares. The site has road frontages to River Road and St Vincent's Road. An internal road network provides vehicular access across the site.

The location of the project area is shown in Figure 1.

Greenwich Hospital has operated from the site since 1966. HammondCare has owned and operated Greenwich Hospital since 2008. Lot 3 DP 584287 contains the existing Greenwich hospital, associated inpatient and outpatient facilities, car parking and service areas. Existing buildings range between 1 and 5 storeys in height and are interconnected through internal corridors and external pathways. The site is serviced by water, sewer, telecommunication and power services.

The site layout of the existing buildings and associated facilities are shown in Figure 2. The L-shape heritage curtilage is legally known as Lot 4 DP 584287 and contains the two-storey late Victorian house known as ‘Pallister’ and grounds. ‘Pallister’ is listed as State Heritage Item (SHR 00574). The components of the curtilage area that contribute to the significance of Pallister House are:

- Pallister the two-storey late Victorian house;
- Tear-drop shaped carriage loop;
- Mature fig tree; and
- Bridle path from the corner of River Road and St Vincent’s Road towards ‘Pallister’.

No demolition, alterations or additions are proposed to Pallister.

The proposed redevelopment of Greenwich Hospital has been designed to increase the service potential and amenity of the site. This project proposal comprises of health, residential care, seniors living and community facilities. The development will comprise of two medium rise seniors living building, a high-rise health, wellness, and residential care building along with a low-rise respite facility. The design of these facilities sensitively responds to the existing heritage precinct and unique natural landscape. Pallister House will continue to serve as a health training and facilities complementing the new buildings with strong visual and physical links to the proposed community and health functions.

The key objectives of the Greenwich Development are as follows:

- To create a new Health and Seniors Living campus which shifts away from the institutional design model, and instead represents a homely environment which is well integrated with the wider community.
- To increase capacity to continue to meet the local need for frail aged residential service.
- To continue and enhance specialised health service offerings such as rehabilitation, palliative and supportive care, pain management, mental health care for older people, community and other vital support services.
- To enhance the natural landscape of the Greenwich site to provide a high-quality, welcoming space for residents, patients and the wider community.
- To enhance heritage precinct landscape and create strong relationships between the site, Pallister House, and the proposed buildings.

Further information about the proposed development and impacts is presented in Section 7.0.

No Aboriginal objects have been previously recorded within the project area boundaries. The 2018 ACHAR found that a portion of the project area has moderate potential to contain Aboriginal objects. Further information relating to the archaeological potential is presented in Section 4.0.

This report has been produced in accordance with the following OEH guidelines:

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011);



- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b); and
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010a).

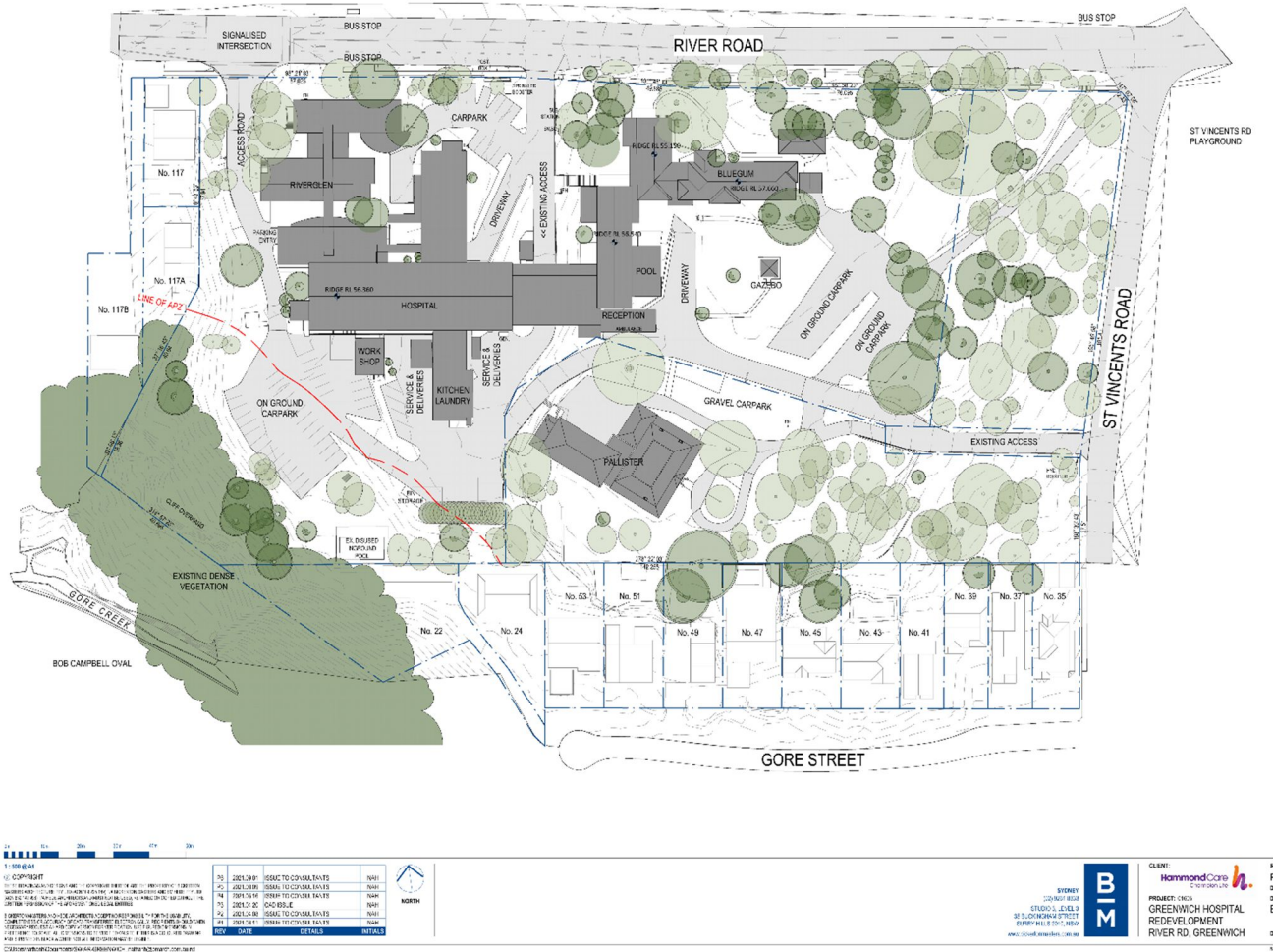
## **1.2 LIMITATIONS AND AUTHORSHIP**

Assessment of non-Aboriginal (historic) archaeological potential has been undertaken separately and is not included in this report. Reporting and analysis for this assessment was undertaken by Vanessa Hardy (BA Hons), archaeologist and Director of Cultural Heritage Connections Pty Ltd. The report has been reviewed by Dr Eleanor Casella, Archaeologist with CHC.

## **1.3 REPORT OUTLINE**

The following section (Section 2.0) provides detail on the legislative context for the project. Section 3.0 of this report provides a summary of the environmental context of the project area. Section 4.0 examines the archaeological background and Section 5.0 presents an update on additional consultation undertaken since the completion of the 2018 ACHAR. Section 6.0 details the current site conditions, while Section 7.0 describes the proposed development and potential impacts to cultural heritage. Section 8.0 provides a discussion and presents recommendations arising from the archaeological assessment.

Figure 2: Existing site layout



## 2.0 LEGISLATIVE CONTEXT

This section outlines the legislative framework protecting archaeological heritage sites in NSW. It does not purport to be legal advice. It presents an interpretation of the implications for the management of archaeological sites within NSW and the study area as understood by the consultant.

As discussed above, the project is being assessed as a State Significant Development. For an SSD where Aboriginal objects will be subject to impact, there is no requirement for an Aboriginal heritage impact permit under section 90 of the *National Parks and Wildlife Act 1974*. Instead, Secretary's Environmental Assessment Requirements (SEARs) are developed to guide the preparation of an Environmental Impact Statement (EIS) for approval by Department of Planning, Industry and Environment (DPIE).

The SEARs are generally intended to produce an assessment to the same standards as non SSD projects. The information below relates to the general legislative requirements for Aboriginal heritage in NSW.

SSD 8699 for the concept design included the following requirement:

- Where relevant, address Aboriginal Cultural Heritage in accordance with the *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011) and *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

As discussed above, the updated SEARs for the current phase include the requirement to:

*Demonstrate that the recommendations of the Aboriginal Cultural Heritage Assessment Report approved under SSD-8699 have been addressed in the proposed development.*

### 2.1.1 Environmental Planning and Assessment Act 1979

The *EP&A Act* requires that environmental impacts are considered in land use planning and decision-making. The definition of 'environmental impacts' includes impacts on the cultural heritage of the project area. The Act sets out specific statutory assessment processes including:

- Part 4: Development that requires consent under consideration of environmental planning instruments.
- Part 5: An assessment process for activities undertaken by public authorities and for developments that do not require a development consent but an approval under another mechanism.

### 2.1.2 National Parks and Wildlife Act 1974 (amended 2010)

The *National Parks and Wildlife Act 1974* (NPW Act) protects Aboriginal objects and Aboriginal places in NSW. It has been amended by the National Parks and Wildlife Regulation 2009 (NPW Regulation). Under the NPW Act, the following are offences unless an exemption or defence is provided for under the Act:

- A person must not knowingly harm or desecrate an Aboriginal object (knowing offence)
- A person must not harm or desecrate an Aboriginal object or Aboriginal place (strict liability offence)

The maximum penalty for the knowing offence is \$550,000 or \$275,000 (depending on whether there are aggravating circumstances) and 1 or 2 years' goal for an individual. For a corporation the maximum penalty for the knowing offence is \$1.1 million. The maximum penalty for the strict liability offence is \$110,000 or \$55,000 (depending on whether there are aggravating circumstances) for an individual or \$220,000 for a corporation.

Harm includes acts or omissions that "destroy, deface or damage" an Aboriginal object or Aboriginal Place, and in relation to an object, move the object from the land on which it has been situated. Harm does not include something that is trivial or negligible.

Section 91 of the Act also obliges any person who discovers an Aboriginal object to report it to Heritage NSW for it to be entered on the AHIMS.

An Aboriginal object is defined as:

"...any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains."

An Aboriginal object is legally protected irrespective of land tenure, the significance of the object and whether or not it has been recorded.

"Aboriginal Places" are places so declared under Section 84 of the Act.

Anyone who exercises due diligence in determining that their actions will not harm Aboriginal objects has a defence against prosecution for the strict liability offence if they later harm an object. Due diligence can be exercised by complying with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010c) (or industry-specific codes of practice) that has been adopted under the National Parks and Wildlife Regulation 2009. The code provides a process to enable a reasonable determination of whether or not Aboriginal objects will be harmed by an activity or whether further investigation or an Aboriginal Heritage Impact Permit (AHIP) are required.

There is also a range of defined exemptions and low impact activities defined in the Regulation for which due diligence is not required. These include undertaking specified farming, land management, maintenance, surveying or environmental rehabilitation works.

*Clause 80B Defence of carrying out certain low impact activities: section 87 (4)*

*(1) It is a defence to a prosecution for an offence under section 86 (2) of the Act, if the defendant establishes that the act or omission concerned:*

*(a) was maintenance work of the following kind on land that has been disturbed:*

*(i) maintenance of existing roads, fire and other trails and tracks,*

Under the amended Act a permit is no longer required to *look for* Aboriginal objects providing the investigation is undertaken in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b). Archaeological test excavations that follow the code do not require an AHIP. If objects are present and harm cannot be avoided it is necessary to apply for an AHIP.

There are also requirements for consultation with Aboriginal people relating to AHIP applications. These are set out in the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010a).

## **3.0 ENVIRONMENTAL CONTEXT**

Analysis of the environmental context is essential for developing accurate models of cultural activity, site distribution patterns and the archaeological potential of any given area. Environmental characteristics influence the types of archaeological sites that occur. An understanding of how the landscape looked and behaved in the past can help us to predict where Aboriginal people may have undertaken various activities and therefore the types of archaeological sites that may be found in the present. In addition, environmental processes influence the preservation of sites. Heavy erosion or acidic soils are likely to destroy or damage certain types of evidence, reducing the likelihood of locating evidence of past occupation. Certain environmental aspects may also have significance for Aboriginal people both in the past and in the present.

The study area is located within the Sydney Basin. Its environmental setting is discussed below.

### **3.1 GEOLOGY & LANDSCAPE**

The study area is within the Harbour Foreshores physiographic region of the Sydney Basin, south of the Hornsby Plateau (Chapman and Murphy 1989). The Sydney Basin is underlain by Triassic sediments, which dip gently from the east and north towards a central lowland situated south-west of Parramatta. As the basin rises to the north it is transacted by the drowned river valleys of the Parramatta and Georges Rivers. The action of these rivers has exposed the underlying Hawkesbury Sandstone and produced the ‘rugged to undulating’ valleys of the Harbour Foreshores physiographic region (Chapman and Murphy 1989).

Stone suitable for tool manufacture occurs across the Sydney Basin. Recorded artefacts have been made from silcrete, chert, ‘indurated mudstone’/‘silicified tuff’, quartz, quartzite and basalt. Many of these materials can be commonly found as cobbles or boulders eroding out of deposits near creek lines.

The project area is located on an upper slope landform near a locally elevated crest. The topography of the site rises towards the centre from the south-eastern and south-western property boundaries, with the south-western part of the site falling steeply away towards Gore Creek.

Availability of water is a critical factor for occupation for Aboriginal people as it not only sustains their families and groups but also attracts flora and fauna that are important food, medicinal and shelter resources. Where permanent water is located through fresh water springs and higher stream order watercourses, for example, third, fourth and fifth order streams and confluences (following Strahler (1952)), larger Aboriginal camp sites or areas of repeated visits/camping are more likely to be identified. The survival of such sites is dependent on the impacts of subsequent land use and erosion.

There are no permanent water sources within the project area. There may have been minor drainage lines, although the extent of development makes these hard to reconstruct. The closest reliable water source is Gore Creek, approximately 60 metres to the southwest. There is a steep drop to the creek at this location where it is approximately 500-600 metres from its confluence with the Lane Cove River. Part of

the creek has been infilled for sporting grounds. Prior to infilling, the creek would have been a wide estuary at this location. It is likely that the proximity of the varied resource zones of freshwater and the nearby tidal section of the Lane Cover River would have been attractive to the past inhabitants.

### **3.2 SOILS**

Soil landscapes are a way of categorising soils that have common soil attributes and landform features. The project area is mapped as partly within the Gymea erosional soil landscape and partly within the Hawkesbury colluvial soil landscape (Chapman, et al. 1989).

The Gymea soil landscape is common along the Harbour foreshores as well as the Lane Cove, Parramatta and Georges Rivers. It is based on a Hawkesbury Sandstone geology. The landscape of this soil type is typically undulating to rolling low hills. Slopes range from 10 to 25% with local relief of 20-80 metres. The sideslopes include varying width sandstone benches (10-100 metres) often forming broken scarps (Chapman and Murphy 1989). In this locality the Gymea landscape sits in the elevated areas/ridges above the Hawkesbury colluvial soil landscape of the waters edges of the Lane Cove and Parramatta Rivers.

Topsoil (A1 horizon) of the Gymea Landscape is a loose, coarse loamy sand to sandy loam, porous with an apedal single grained structure. Its colour can range from brownish-black where high levels of organic matter are present to a bleached dull yellow-orange. Its pH ranges from slightly to strongly acidic. Sandstone and ironstone inclusions are common. Where erosion has occurred underlying clayey sands and sandy clay subsoils can be exposed. Bedrock may also be exposed.

On crests up to 30 centimetres of A Horizon generally overlies bedrock or B Horizon soils. Sideslope soils are discontinuous and rock outcrop may be present. Up to 30 centimetres of A Horizon is commonly present on the inside and outside of benches (Chapman and Murphy 1989).

The Hawkesbury soil landscape is rugged, rolling to very steep hills with local relief of 40-200 metres. Slopes are generally greater than 25% and up to 70% with over 50% rock outcrop at the surface. Valleys are narrow and incised. Dominant soils are a loose coarse quartz sand (sand to sandy loam) occurring as a topsoil and a clayey sand to sandy clay loam B or C horizon in association with sandstone bedrock. Topsoils are typically varied from a dull yellow orange to a brownish black where organic matter is present becoming lighter at depth. Subsoils are often yellowish with gravel, stone and ironstone-plated sandstone fragments common. The soils are shallow (<50cm) and discontinuous. They are susceptible to sheet erosion, particularly after fire (Chapman and Murphy 1989).

Neither soil types are ideal for preserving in situ occupation deposit in open sites. In the local area sites containing artefacts are more commonly located in sandstone rock overhangs (shelters).

### **3.3 FLORA AND FAUNA**

The project area has been cleared since European settlement. On-site vegetation includes a mix of exotic species and remnant vegetation. In the past, the area would

have provided a wide variety of flora and fauna resources for the Aboriginal communities who lived there. The vegetation communities of the greater Sydney area have over 200 species with edible parts (Attenbrow 2002). Many plants were exploited as a minor food resource, for example berries or plant nectars. Wood was used to make canoe poles, weapons, woomeras, boomerangs and was used for firewood. Plant resins were used to fix parts of tools together. Bark was used for huts, carrying vessels, canoes, shields, fishing lines, bedding, blankets and torches, amongst other things (Attenbrow 2002: 113). Fibres were used to make ropes that could then be used in traps and nets for trapping animals, birds and fish. *Casuarina* species were used for bark for canoes, *Xanthorrhoea* were used for spear shafts and the nectar was also eaten (Gunn 1992). Local knowledge of medicine plants was also an important part of Aboriginal culture.

In the study area vicinity, the higher ridgelines would have contained heaths and woodland (dry sclerophyll) including species such as red bloodwood (*Eucalyptus gummifera*), yellow bloodwood (*E. eximia*), scribbly gum (*E. haemastoma*), brown stringybark (*E. capitellata*) and old man banksia (*Banksia serrata*). As well as *Banksia*, understorey shrub species would have included *Grevillia*, *Hakea*, *Acacia*, *Leptospermum* and *Boronia*. In the slopes to the Lane Cove River, taller woodland or open-forest would have occurred with main tree species including Sydney peppermint (*E. piperita*) and smooth-barked apple (*Angophora costata*) (Chapman and Murphy 1989; Benson and Howell 1990). Blue Gum high forest was also known to be present in the shale capped pockets of the local area. The trees of the Blue Gum high forest were highly prized for their timber and were extensively cleared early in the colonial occupation of Sydney (Benson and Howell 1990: 114).

Aboriginal firing of the landscape may have resulted in opening up of grasslands in the valleys and ridge tops, which, in turn, increased the habitat for large macropods. Most Australian land mammals are available all year around as they are not migratory; however, some may be easier to catch at certain times, for example possums are less active in the winter months. Possums are frequently referred to as part of the diet of Aboriginal people in Sydney. It was previously thought that a marked difference would be found between the inland and coastal diet of groups in the Sydney area, due to the coastal availability of fish and shellfish. However, many of the same animal species are found in bone remains excavated at archaeological sites inland and in coastal areas. In general, macropods are common and would have formed an important part of the diet (Attenbrow 2002: 71). Water based plants, birds and animals would also have been exploited in the local area particularly because of the proximity of the harbour.

Overall, the resources available to inhabitants of the study area region could have provided a varied and generally reliable resource to sustain the many economic and social requirements of large Aboriginal groups.



## 4.0 ARCHAEOLOGICAL CONTEXT

For the purposes of determining settlement and site location patterns, archaeologists examine regional and local trends in the distribution of known sites in relation to environment and topography. This information can be used to provide a picture of behaviour in the past as well as indicate how evidence of that past behaviour might be preserved in the archaeological record. Additional information was provided in the previous ACHA report. The following provides an overview of relevant regional and local archaeological evidence.

### 4.1 REGIONAL PREDICTIVE MODELLING

Timing of the Aboriginal occupation of the Sydney region has been subject of ongoing research. An early date (41,700  $\pm$  3000/-2000 BP (years before present)) was taken from artefacts found in gravels of the Cranebrook Terrace on the Nepean River (Stockton and Holland 1974), however there is some disputes over the actual age of the deposits. More recent Pleistocene period dates are considered more reliable.

A site (RTA-G1) excavated by McDonald (2005) within the Parramatta Sand Sheet in the city centre of Parramatta has been dated to 30,735  $\pm$  407 BP. A rock shelter site north of Penrith on the Nepean, known as Shaws Creek K2, is another Pleistocene dated site, dated to 14,700  $\pm$  250 BP (Attenbrow 2010:18). More recently, a salvage excavation at Pitt Town on the banks of the Hawkesbury River has the lowest deposits containing artefacts dated to 15,000 BP (Williams, et al. 2012: 95).

The evidence of site dates demonstrates that Aboriginal people have inhabited the greater Sydney region for many thousands of years. In light of this it is expected that a range of evidence of that past habitation will be present. Much of the archaeological work done in the Sydney Basin has been focused on the Cumberland Lowlands. Less is known about the Harbour Foreshores specifically, although many of the findings will have general applicability. Despite extensive development across Sydney, resulting in the destruction of archaeological evidence, thousands of sites have been recorded.

During the many thousands of years of Aboriginal occupation of the Sydney Basin numerous changes have occurred to climate and resources. Inevitably social alliances, groupings and occupation patterns would have also changed. Due to the differences in resources available for coastal and inland areas, it has been frequently assumed that hinterland and coastal groups had very different lifestyles; in summary, coastal people were 'fishers' and inland people were 'hunters'. This has not always been supported by evidence from archaeological excavations that suggests that coastal people also exploited a wide range of terrestrial resources and hinterland people had a variety of riverine resources available for use.

The most common site types recorded are rock shelters with midden deposit, rock shelters with art, rock art petroglyphs (often referred to as 'rock engravings') and open artefact scatters. These four site types each have a frequency between the 15-20% of recorded sites. Less frequently recorded site types (5-15% frequency) include rock shelters with artefacts, grinding grooves and open middens (Wheeler 2004). Many of these site types are largely dependent on specific environmental factors for their occurrence. For example, in areas where sandstone rock overhangs are present sites are

commonly located within the overhangs and other sites such as middens, where shellfish are processed and discarded, occur along waterways.

In the Cumberland Lowlands to the west, open artefact scatters are by far the most common site type recorded. Open artefact scatters can range from a few discarded stone pieces (resulting from a one-off use of an area) to large sites which may have been visited by a large number of people and/or been repeatedly used over many years. In these larger sites, distinct areas relating to specific activities can sometimes be located, such as knapping floors where individuals would have sat to manufacture stone tools. Sites can also include other habitation remains such as animal bone, shell or fireplaces (known as hearths).

Rock shelter sites are the most common site type in the Harbour Foreshores region (Attenbrow 2002: 49). This is likely to be a combination of the fact that activities were focused within the protection of shelters, but also that these areas are generally better preserved/less developed. It is likely that large well protected shelters with a good aspect were used repeatedly over time. Material is generally better preserved in shelter sites. The relatively shallow soils and higher erosion in sandstone foreshore landscapes would have inhibited the preservation of many open sites. Additionally, many sandstone outcrop areas are in steep terrain that has remained undeveloped. Preserved shelters not only contain artefact sites but also art. Within the sandstone topography, open artefact sites are rarer than on the Cumberland Plain, and most likely to be located close to water. Grinding grooves can occur on flat sandstone surfaces near water. Midden sites occur within and outside of shelters.

## 4.2 LOCAL CONTEXT

The *Port Jackson Archaeological Project* was undertaken in the early to mid 1990s partly because it was recognised that the archaeology of Port Jackson and surrounds was comparatively poorly documented (Attenbrow 1990). This is, to a large extent still the case compared to the extensive amount of work that has been carried out on the adjacent Cumberland Plain. Relatively few excavations have been undertaken in the sandstone geology of Sydney Harbour and its associated rivers. In the Harbour Foreshores region more sites have been recorded on sandstone geology than shale (Irish 2002: 21-22).

Attenbrow notes that the physical evidence of the activities of the Aboriginal inhabitants was recorded by the early non-indigenous settlers. Governor Phillip commented on the observations of rock engravings by exploration parties with the First Fleet and also ordered that the 'burial mounds' along Middle Harbour be investigated (Attenbrow 1990: 1).

The Port Jackson project investigated the distribution of shell middens throughout 8 'sub catchments'. The Greenwich Hospital project area is within the area described as the sub-catchment of the Lane Cove River. It was concluded that 98% of middens are on Hawkesbury sandstone geology. Most of the known sites occur on Council reserves or Crown Lands with only 8% on private or 'non-reserve' land. The highest density of sites was recorded in Middle Harbour. Over half (61%) of the midden sites and 80% of the archaeological deposits were located within rock shelters with over half of all sites occurring within ten metres of the high-water level. It was also acknowledged that some of these patterns might be due to the relative level of development on ridgelines as

opposed to adjacent to the waterfront (Attenbrow 2002). Land tenure also influences the likelihood that sites have been recorded.

A landscape such as the project area would have provided access to a number of different resource zones; making it an attractive location for past occupation. A due diligence assessment was undertaken for the Greenwich Hospital redevelopment by GML Heritage (2018). The assessment identified areas in the south and east of the project area as having some potential to contain Aboriginal objects. This included the area of steep slope in the southwestern corner of the project area and the car park areas in the site's eastern third. These predictions were reviewed as part of the previous ACHAR (CHC 2018) and a new assessment of the archaeological potential was undertaken. The GML report suggests that part of the southwest of the project area, adjacent to Gore Creek retains high archaeological potential. Inspection of this area revealed a steep landform that is highly likely to have been significantly eroded.

The GML predictions of high moderate and low areas of archaeological potential seem to have largely been based on the level of disturbance, specifically prior building construction. The revised predictions of archaeological potential undertaken by CHC are based on ground surface disturbance, but also include a consideration of the likely past use of the landscape and the natural erosion in this type of landscape.

High density open sites outside of middens based on creek lines are relatively uncommon in the local landscape. The most likely location of sites in the locality is within shelters. The original landform steep slope with limited soil preservation is unlikely to have been conducive to preserving open sites, even prior to additional ground surface disturbance due to the site's development.

The site has been developed since the late 1800s and was extensively rebuilt from the 1960s for its current use as a hospital. This development would likely have removed most of any Aboriginal objects that may have previously been present in the area of the building footprint. Additionally, construction is likely to have disturbed adjacent areas as part of demolition and preparation of the site for construction.

Therefore, it has been assessed that for most of the project area there is a low likelihood of Aboriginal objects occurring. One portion of the project area (shown in Figure 3) has some potential for Aboriginal objects within rock overhangs that are currently inaccessible. Visibility is low in this area. The potential for Aboriginal objects to occur is assessed as moderate in the line of rock overhangs. Figure 3 shows the extent of the area of moderate archaeological potential.

The RAPs for the concept design phase, identified the eastern portion of the project area as an area of interest due to the lack of disturbance. No information was received from RAPs at either stage suggesting that they had concerns about sites in the western top of slope above Gore Creek.

The following table (Table 1), provides a description of the best-known site types associated with past Aboriginal occupation in the region as well as an indication of the likelihood of each type occurring in the project area.

**Table 1: Site type definitions**

Site Type	Description
Open Camp Sites/Stone Artefact Scatters/Isolated Finds	<p>Open camp sites represent past Aboriginal subsistence and stone knapping activities and can include archaeological remains such as stone artefacts and hearths. This site type can be revealed as surface scatters of stone artefacts in areas where vegetation is limited and ground surface visibility increases. Such scatters of artefacts can also be exposed by erosion, land use such as ploughing, and the creation of informal, unsealed vehicle access tracks and walking paths.</p> <p>Sites are often located on dry, relatively flat land along or adjacent to a water source. 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.</p> <p>Isolated finds may represent a single item discard event, be the result of limited stone knapping activity, or be an artefact that has been displaced from its original location due to erosion or other disturbance. The presence of such isolated artefacts can also indicate the presence of <i>in situ</i> buried archaeological deposit, or additional artefacts obscured by low ground visibility. Isolated artefacts can be located on all landforms associated with past Aboriginal activities.</p> <p>This site type is the most common on the Cumberland Plain. Open sites are less likely to occur in sandstone geology. Due to the amount of development and erosion in the project area there is a low potential for this site type to occur.</p>
Scarred or Carved Trees	<p>These sites are trees with scars and/or carved patterns which can be attributed to Aboriginal cultural origin. 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. 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.</p> <p>Carved trees contain carved patterns on the tree trunk and are often found in association with ceremonial grounds, burials or cultural sites. Most of the project area has been cleared in the past and there is a low likelihood that scarred trees would be present.</p>
Grinding Grooves	<p>Aboriginal grinding grooves are grooves where Aboriginal people have sharpened or manufactured stone axes and other implements in exposed rock areas (and in some cases, ground seed and grains forming 'bowls'). These sites are most often found in sandstone. This site type can occur where suitable geology is present alongside a water source. Although the project area does contain such geology, there does not appear to be a water source that would have been required for this site type to occur. This suggests that grinding grooves unlikely to occur.</p>
Rock Shelter Sites (closed camp sites)	<p>Rock overhangs in areas of sandstone geology can contain evidence of past Aboriginal occupation. This can include stone artefacts, food refuse such as bone or shell if suitably preserved deposits are present. Shelters also can contain pigment art (see below). The project area contains suitable geology for this site type and there is moderate potential for shelter sites. The shelters</p>

Site Type	Description
	are largely covered by vegetation and landscaped deposit making it difficult to be certain whether sites are present or not.
Art Sites	Petroglyphs (also referred to as Rock Engravings) are art sites where marks have been made in stone by Aboriginal people (for example, spirit figures, animals, implements and footprints). These sites are most commonly found on flat exposed open areas of sandstone. Art within rock shelter is usually painted with ochres and pigments on smooth surfaces on the walls of the shelter. The project area contains rock overhangs, therefore there is some potential for this site type.
Quarries	Aboriginal quarry sites are sources of raw materials, primarily for the manufacture of stone tools, but also for ochre procurement. They are only found where raw materials (stone or ochre) occur within the landscape, and where these have been exploited in the past. Such sites are often associated with stone artefact scatters and stone knapping areas. The project area is unlikely to contain suitable geology for this site type.
Bora/Ceremonial	Aboriginal ceremonial sites have high cultural value to Aboriginal people. They 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 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. These places are more likely to be found below hills or peaks or above low land subject to inundation. These sites are generally determined through community consultation or sometimes via historic recordings. The background review does not indicate that this type of site will be present in the project area.
Natural Mythological (Ritual) sites	These types of sites are usually identified by the local Aboriginal community as locations of cultural significance, and they may not necessarily contain material evidence of Aboriginal associations with the place. These sites are generally determined through community consultation or sometimes via historic recordings. The background review does not indicate that this type of site is present within the project area.
Middens	Middens are the accumulation of debris from fish, crustaceans and other shellfish (shells, fish bones) consumed as part of Aboriginal people's diet. Middens also often contain charcoal, stone artefacts, bone and other types of material used by Aboriginal people. Middens often occur within close proximity to freshwater and saltwater sources which have potential to contain mussels, oysters and other types of edible bivalves. Due to the distance to water, this type of site is unlikely. However it is possible that some midden material could be present within rock shelters.
Burial	Burials can be found in many different archaeological contexts, including shelter deposits and most often where the ground is soft and sandy. Burials can also be found within middens. They can be associated with carved or scarred trees and ceremonial sites. Burials are difficult to detect unless there are visible eroded evidence of a burial or human remains or they have been identified through historic records, or oral histories. The nature of soils and background review do not indicate that this type of site will be present in the project area.

Site Type	Description
Contact / Historical Sites	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. Contact sites are most often determined through historical research and/or community consultation. The background review does not indicate that this type of site is present in the project area.

**Figure 3: Area of moderate archaeological potential (yellow hatch)**



#### 4.2.1 Database Searches

Searches of the NSW State Heritage Register, Inventory and the Australian Heritage database were undertaken. No Aboriginal archaeological sites or places of cultural heritage significance were recorded on these databases. No Aboriginal sites are recorded on the Lane Cove LEP within the project area.

A search of the Heritage NSW AHIMS database was undertaken in October 2021 for an area at Datum: GDA, Zone: 56, Eastings: 331000 - 333000, Northings: 6253000 - 6257000. A total of 84 sites was recorded within this area. None of the sites is within the project area. An updated basic search for the same coordinates was completed in March 2022 with no change to the number of sites present.

There is a mixture of open sites and ‘closed’ sites (within rock shelters), recorded in the vicinity of the project area. By far the most common site type in the locality is midden sites. These occur within and out of rockshelters, most commonly along the harbour and river foreshores. Rockshelter sites are overall more common than open sites. This is consistent with predictive modelling.

**Table 2: Site features from AHIMS results**

Site Feature	Frequency	Percentage
Art (shelter with art)	4	4.8
Art – rock engravings (open site)	5	6.0
Art & artefact (shelter site)	1	1.2
Art, midden & artefact (shelter site)	5	6.0
Artefact & midden (shelter site)	39	46.4
Artefact & midden (open site)	1	1.2
Artefact (shelter site)	1	1.2
Artefacts (Open Camp Site or Isolated Finds)	5	6.0
Midden (open site)	8	9.5
Midden (shelter site)	4	4.8
Potential Archaeological Deposit (PAD open site)	5	6.0
PAD & midden (open site)	1	1.2
‘Habitation structure’ (likely shelter site)	1	1.2
Burial with midden & artefact (open site)	1	1.2
Burial with midden & artefact (shelter site)	2	2.4
Grinding Groove & rock engraving	1	1.2
<b>Total</b>	<b>84</b>	<b>100%</b>

The locations of the registered sites recorded in AHIMS are shown in Figure 4. The location information for sites recorded within the AHIMS is subject to variation in recording methods. Coordinates provided are often indicative rather than exact. The accuracy of locations cannot always be relied on. The author cannot vouch for the accuracy of the information provided by AHIMS or other agencies.

Artefact and stone types identified in artefact sites across the region include flakes, broken flakes, flaked pieces, broken pebbles, micro-blades, cores, backed blades and blades. Raw materials included quartz, silicified wood, tuff, chert, quartzite, volcanic, silcrete, and chalcedony. Stone artefact sites have been located within the study area and the broader project area. Stone materials include silcrete, quartz, and a stone known as either indurated mudstone or silicified tuff.

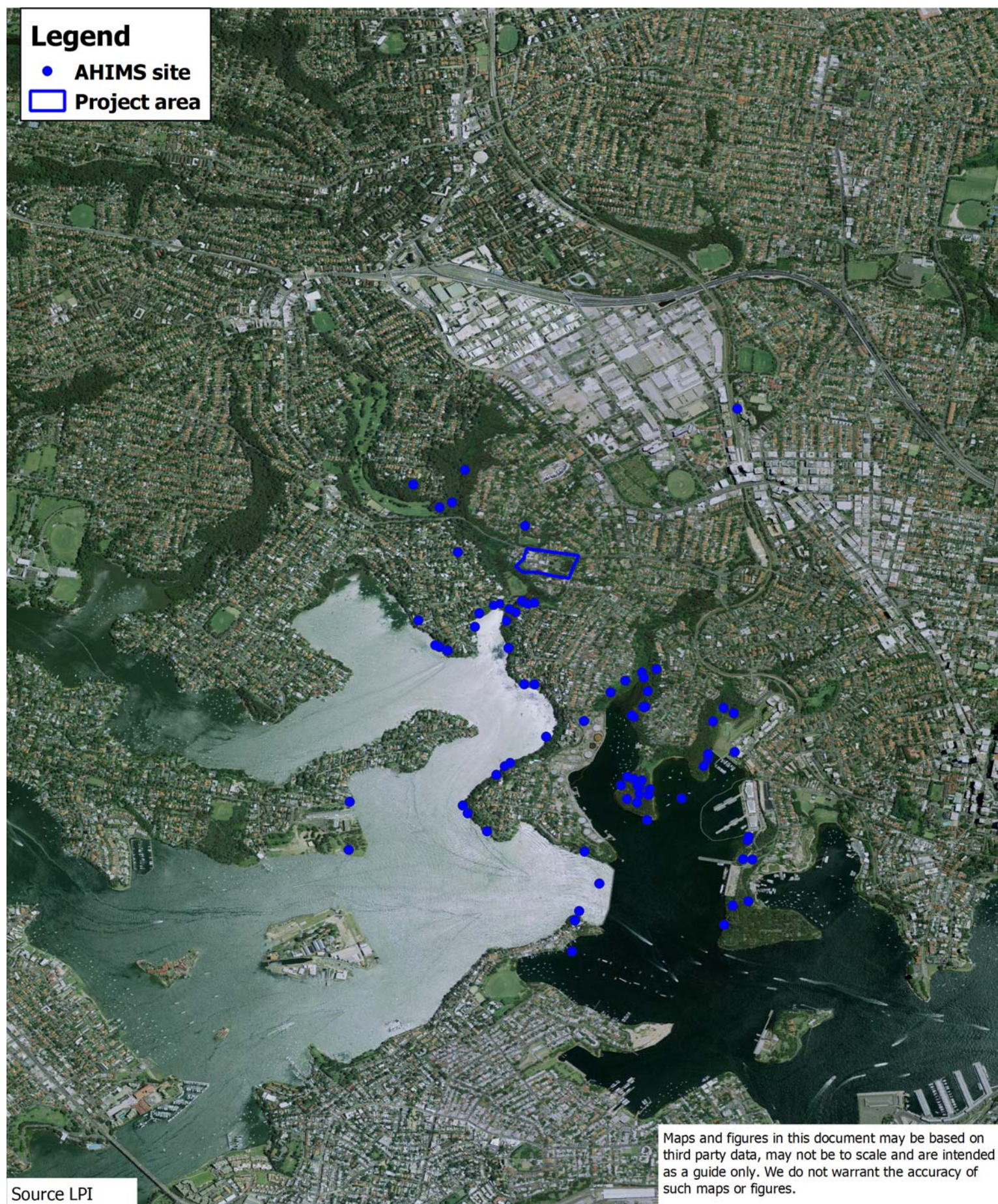
### **4.3 SUMMARY**

The region has been shown to have been a favoured place of occupation for Aboriginal groups in the past. The project area vicinity has abundant resources and would have provided for relatively large groups. Artefact scatters of high density are usually found within 200 metres of significant waterways with the highest significance sites within 100 metres on elevated terraces. Subsurface artefact densities will be lower on upper slopes and crest/ridgelines and higher on lower slopes.

In summary, there would have been relatively large Aboriginal populations utilising the project area and surrounds. The number of sites recorded on AHIMS is a fraction of what once would have been present. The major factor influencing the potential for unrecorded sites to be located will be the level of disturbance in this developed area.

Previous assessment of the project area as part of the concept design phase of the project, has identified the eastern portion of the project area as an area of interest due to the lower level of disturbance. There is a row of sandstone overhangs at the top of the area, which slopes steeply down to St Vincents Road. Ground surface visibility is low and some of the rock overhangs are inaccessible due to vegetation. The area has been assessed as having moderate archaeological potential and is shown in Figure 3.





**Figure 4: AHIMS site locations**



## 5.0 CONSULTATION UPDATE

The previous (2018) ACHAR undertaken for the concept design phase included Aboriginal consultation to comply with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010a).

As more than six months had passed since the last correspondence with the previously identified Registered Aboriginal Parties (RAPs), the decision was made to update the consultation. A summary of the previous consultation is provided below, along with the updated consultation information.

The aims of consultation include, to:

- determine the cultural significance of a project area;
- identify Aboriginal objects of cultural value within a project area; and
- identify places of Aboriginal cultural value (whether or not they are Aboriginal places declared under Section 84 of the NPW Act).

### 5.1 PREVIOUS CONSULTATION FOR CONCEPT DESIGN PHASE

As part of the 2018 assessment a total of 17 RAPs were identified and registered. As part of the update to consultation all of the previous RAPs were contacted and invited to re-register, regardless of whether they were still on the revised lists provided by notified organisations.

#### 5.1.1 Summary of Comments from Previous Assessment

In 2018 all 17 RAPs were provided with project information, project methodology and draft reports for required comment periods. They were also offered the opportunity to attend a site inspection. The following is a summary of the comments received during the earlier phase of assessment. The consultation is documented fully in the previous report (CHC 2018). A summary of the stages of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* and how consultation met these requirements is presented in Appendix 2.

Darug Land Observations provided comment on the project information and draft project methodology stating support of the methodology and also noting that they strongly believe that recovered artefacts should be re-buried on Country (project area).

Tocomwall provided notification that they will not review information if not paid and that they will reject all reports if their services are not paid for.

The following groups provided endorsement of the methodology with no comments or changes:

- Yulay Cultural Services
- Duncan Falk Consultancy
- Didge Ngunawal Clan

Jenny Beale and Jack Gibson from Butucarbin Aboriginal Corporation attended the site inspection. An initial discussion and review of the proposal was undertaken, and hard

copy plans provided. This was followed by a walkover of the project area. Ken McPhail of HammondCare accompanied the RAPs and the archaeologist providing clarification of the proposal plans, where necessary.

The RAPs identified the eastern portion of the project area as an area of interest due to the relatively low level of disturbance and the presence of the sandstone overhang. Suggestions were made to consider an acknowledgement of Aboriginal cultural values within open space. Jenny Beale said she would like to see some of the area preserved. She also wanted to be able to inspect the sandstone shelters/rock overhangs again if the vegetation and landscaping material is cleared from in front of them. A discussion was had about the potential for some interpretive signage and landscaping to include acknowledgement of the prior occupation of Aboriginal people, including ideas such as a bush medicine garden in keeping with the theme of the hospital development.

The draft ACHAR (including ATR) was sent to all RAPs. The only comment received was from Darug Land Observations via email. The comments stated that they support the proposed activities and that if “any artefacts are recovered during the construction stages, we strongly believe that these recovered artefacts should be re-buried on Country”. This was incorporated into the recommendations with a suggestion to consider reburying any artefacts within the project area.

## 5.2 UPDATED CONSULTATION

Detail of how each step of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (requirements) was complied with during updated consultation is presented in Appendix 2 along with a summary of the previous consultation. Copies of relevant correspondence are also included.

### 5.2.1 Registered Aboriginal Parties (RAPs)

Seven RAPs were identified for the ongoing consultation. They are listed in Table 3. Of these, four were previously registered and three are new registrations (A1 Indigenous Services, Darug Custodian Aboriginal Corporation (DCAC) and Kamilaroi Yankuntjatjara Working Group).

**Table 3: Aboriginal parties who registered interest – updated list**

Registered Aboriginal Party
A1 Indigenous Services
DCAC
Kamilaroi Yankuntjatjara Working Group
Didge Ngunawal Clan
MLALC
Yulay Cultural Services
Goobah

## 5.2.2 Summary of Updated Consultation Steps

Letters were sent to the agencies provided in the consultation requirements (or their updated equivalents) on 14/7/21 to notify of the project proposal and revised registration of interest. A closing date of 30 July 2021 was provided to all agencies for a response to this letter.

A notification was placed in the Public Notices section of the North Shore Times, online on Thursday 15 July, 2021 with a closing date for registration of interest included as Friday 30th July 2021.

Letters were sent to all Aboriginal people provided by organisations via email and/or express post on 30 July 2021. Closing date for registrations was, 13 August 2021. Letters were also sent to all 17 previously identified RAPs on the same date (regardless of whether they were on the organisation lists) inviting them to re-register. Three of the previously registered groups re-registered for the ongoing consultation.

An email was sent to the Metropolitan Local Aboriginal Land Council and to Heritage NSW on 24-25 August 2021 with the names of all groups who had consented to have their details provided.

Project information and a draft project methodology was sent to all RAPs on 11 October 2021. Deadline for comment on the information was set for 8 November 2021. In addition to the required information, a copy of the report for the previous ACHA was also provided.

A copy of the draft report and testing methodology was sent to all RAPs via email on 14/1/2022.

## 5.2.3 Comments on Project Methodology/Project Information

Goobah replied to say that they support the project and have no specific comment at this time. A1 Indigenous Services replied stating that the project methodology and information had been reviewed and they support the information outlined in the documents.

Darug Custodian Aboriginal Corporation (DCAC) provided a written response that includes a statement that the project area is significant to the Darug people partly because there are significant known sites in close proximity. The letter also states that:

*Landscapes and landforms are significant to us for the information that they hold and the connection to Darug people. Aboriginal people (Darug) had a complex lifestyle that was based on respect and belonging to the land, all aspects of life and survival did not impact on the land but helped to care for and conserve land and the sustenance that the land provided.*

DCAC expressed support for the recommendations of the ACHAR and generally wish to continue to be involved in the project to provide input on cultural heritage values. They also note that they are familiar with working with all aspects of heritage management including interpretation and education strategies.

Some follow up phone calls were undertaken and additional RAPs provided verbal comment. Didge Ngunawal Clan said they wish to be kept up to date and support the draft methodology. Yulay Cultural Services also verbally gave support for the methodology.

Kamilaroi Yankuntjatjara Working Group responded including the following:

*For tens of thousands of year Aboriginal people have occupied the land and managed the land in a cultural manner and continue to do so by caring for country. We follow the water ways look to the sky for guidance and care for mother earth as she provides for us. The study area is highly significant to us, having access to main water ways and fresh water sources suggest that Aboriginal occupation took place within the area. These water ways are highly important to us and are utilised daily, aquaculture and agricultural practices would have been utilised by the Aboriginal people as the coastal area would have undertaken fishing and in land people would have been hunters, vies verse as trading would also take place.*

They also noted that burial locations are often unknown and need to be considered. Additionally, they suggest that a cultural interpretation plan should be included in the project and would like to be involved in discussions around any such plan. They also recommend that sub-surface investigations be conducted prior to ground disturbing works.

RAPs were provided a copy of the previous assessment report and were aware that sub-surface testing had been recommended. The opportunity to participate in a voluntary site visit was provided to all RAPs. None of the RAPs stated that they wanted to attend a site visit, therefore none was organised. All RAPs were reminded of the offer and some stated they were satisfied to attend site during future testing.

## 5.2.4 Submissions/Comments on Draft Report & Testing Methodology

RAPs were provided with a copy of the draft report and proposed testing methodology on 14/1/2022 with a request to provide comment by 11/2/2022. If written comments were not received a reminder call was placed. All groups were contacted prior to finalising this report. An initial indication was that sub-surface testing would be undertaken shortly after the end of the comment period on the draft report. However, due to logistical issues with a working hospital site permission was sought to undertake testing as a condition of consent. RAPs were informed that testing would be postponed. All groups support the need for sub-surface testing and were satisfied with the approach taken.

Verbal comments were received from the Metropolitan LALC who said they were satisfied with the draft report and wished to remain involved. Similarly, verbal comments were received from Didge Ngunawal Clan who supported the recommendations and A1 Indigenous Services who also supported the report recommendations and wished to be kept informed and involved in any future testing.

Yulay Cultural Services responded in writing to confirm agreement with the methodology for the project and testing and stated they “would like the opportunity to assist with the works when they commence”. Goobah responded in writing to confirm “we support the ACHAR and ATR and wish to be kept up to date with any further developments”.

Kamilaroi Yankuntjatjara Working Group responded in writing reiterating their recommendation that sub-surface testing be undertaken with their involvement. The response included the following comment.

*Thank you for your ACHA for Greenwich Hospital redevelopment. We come from the sky, we were brought here by the creator to care for mother earth and shape her as she provides us with resources and provides life, we follow the water ways that were created by the rainbow serpent. We believe in our dreaming, song line's, spirituality and we have a lore and kinship way of life a sophisticated, civilized life.*

*The study area is close to the Lane Cove River and Berrys Creek two main water ways that have been created by the rainbow serpent and have creation stories behind them and the flora and fauna surrounding them. These water ways are utilised by Aboriginal people as fresh water source and other resources in an abundance. Also utilised for daily activities such as bathing, birthing, ceremonial practices etc.*

*There are dreaming creation stories within the area along with astatic, tangible, and intangible aspects connecting Aboriginal people to the land and the flora and fauna. This must be considered within your report and through interpretation. We are happy to see that there is an interpretation plan being prepared for this project. We highly recommend it to educate the wider community, it is important that an interpretation plan be sort for a hospital project as a wider range of the community comes through hospitals. This can be achieved through native landscaping, healing/ native medicine gardens, edible gardens, Aboriginal art, digital displays, design, water features, sound scape and 3D imagery.*

*When considering interpretation, we must consider the ancient and more modern history of Aboriginal Australia. Incorporating cultural heritage along with colonial history and the fight and achievements of Aboriginal people throughout history till the present time.*

*We would like to agree to your recommendation, and we support your report, we look forward to furthering consultation for this project.*

DCAC provided written comment and noted that there are many significant sites in the local area. Their submissions included the following.

*We support the project information for the Greenwich Hospital redevelopment additional report and testing methodology.*

*The Greenwich area is an area our group has a vast knowledge of, we have worked and lived in for many years, this area is highly significant to the Darug people due to the connection of sites and the continued occupation. Our group has been involved in all previous assessments and works in this area as a traditional owner Darug group for the past 40 plus years.*

*Surrounding this area are many highly significant sites.*

*Aboriginal peoples are the oldest continued culture...the land may have been taken from us for many tens of years and disturbed. However, they still have cultural values, as a culture we have had to adapt to a forever changing landscape, allowance for culture, way of practicing these cultures and even our language is forever changing and adapting.*

▪ *Our Darug land can only be assessed by Darug people, we have our song lines and creation places that only our people can identify, our connection to our nura is part of us and our country.*

- *Our histories are held by our people and places, when we are looking for cultural aspects of an area they are not only seen but felt, our spiritual connections are our culture and heritage that connect us to our old people through the evidence that we see on our site visits.*
- *People from other mobs should be respectful of our country and people if they are not respectful that the Darug are the knowledge holders then they are not cultural, therefore should not be involved on cultural heritage on Darug land.*

*This area is significant to the Darug people due to the evidence of continued occupation, within close proximity to this project site there is a complex of significant sites.*

*Landscapes and landforms are significant to us for the information that they hold and the connection to Darug people. Aboriginal people (Darug) had a complex lifestyle that was based on respect and belonging to the land, all aspects of life and survival did not impact on the land but helped to care for and conserve land and the sustenance that the land provided. As Darug people moved through the land there were no impacts left, although there was evidence of movement and lifestyle, the people moved through areas with knowledge of their areas and followed signs that were left in the landscape. Darug people knew which areas were not to be entered and respected the areas that were sacred.*

*Knowledge of culture, lifestyle and lore have been part of Darug people's lives for thousands of years, this was passed down to the next generations and this started with birth and continued for a lifetime. Darug people spent a lifetime learning and as people grew older they passed through stages of knowledge, elders became elders with the learning of stages of knowledge not by their age, being an elder is part of the kinship system this was a very complicated system based on respect.*

*Darug sites are all connected, our country has a complex of sites that hold our heritage and past history, evidence of the Darug lifestyle and occupation are all across our country, due to the rapid development of Sydney many of our sites have been destroyed, our sites are thousands of years old and within the short period of time that Australia has been developed pre contact our sites have disappeared.*

These written submissions emphasise that the archaeological assessment in this report only tells part of the story. Connection to the whole of landscape and the unique knowledge system of Aboriginal cultures are key to understanding the cultural value of the site. The knowledge of the Aboriginal people of the local area needs to be incorporated into the ongoing management of the cultural values of the site. This can include participation in the archaeological testing, as requested, but should also include opportunities for cultural knowledge to be highlighted, where appropriate in the interpretation and overall design of the site. This information will also be included in the management plan to be produced following the archaeological testing.

### **5.3 SUMMARY**

The consultation process was re-commenced as it had been longer than six months since the previous RAPs had been contacted. In addition to the consultation requirements, all previous RAPs were contact to confirm if they wished to continue to be consulted on the project. In total, seven groups registered for revised consultation.

Of these, four were previously registered (Didge Ngunawal Clan, MLALC, Yulay Cultural Services and Goobah) and three are new registrations (A1 Indigenous Services,

Darug Custodian Aboriginal Corporation (DCAC) and Kamilaroi Yankuntjatjara Working Group).

In general, all seven RAPs were interested in staying involved in the project and wished to be kept informed about the archaeological testing which is now likely to take place as a condition of development consent. Kamilaroi Yankuntjatjara Working Group, DCAC and MLALC all expressed they would like to be involved in ongoing discussion relating to interpretation on the site.

Consultation requirements were fulfilled according to the *Aboriginal Cultural Heritage Consultation Requirements for Proponents*. All RAPs will continue to be involved in the project going forward. No groups raised any objections to the proposed development or the assessment methods, provided consultation is ongoing and sub-surface testing is undertaken prior to ground surface disturbance.



## 6.0 SITE CONDITIONS

The site has been subject to previous inspection and assessment that was fully documented in the ACHAR (CHC 2018). The following is a summary of the site conditions to provide context to the revised assessment of potential impacts. Further inspection in September 2021 during works for a related assessment, showed no significant changes to the site's potential for Aboriginal objects.

### 6.1 LAND USE HISTORY

The history of post-contact development of the project area is detailed in numerous previous assessments including a historic archaeological assessment (GML Heritage 2018) and the Conservation Management Plan (NBRSP 2004). The following is a brief summary of the past history of the site relevant to understanding development impacts that may have reduced the potential for preservation of any Aboriginal objects.

Assessment identified four phases of development at the site:

1. Early land grants and land ownership (1788-1882)
2. Gentlemen's estate, 'Standish' (1883-1937)
3. Girls' school (1937-1946)
4. Pallister Girls' Home and Greenwich Hospital and Pallister (1946- present)

The project area appears to have been undeveloped prior to 1883 when it was purchased by John St Vincent Welch. After initial clearing and landscaping the house now known as 'Pallister' (prior to 1947 it was named 'Standish') was built in 1892. Various other additions were made to the grounds during the time it remained a private residence, including: tennis courts, a swimming pool, driveway/ access road, and various out buildings such as staff quarters and stables/garages. In 1937 the property was purchased by Sydney Church of England Girls' Grammar School. During this time additional sporting facilities were added and a new wing for classrooms in Pallister House was constructed in 1938. There was also a realignment of the previous driveway. It appears that the school only remained on site until 1942 and that it was subsequently used as a Girls' home from 1943. There are no records of major additions during its use as a home. Subdivision occurred between 1960 and 1964, enabling the sale of lots 1-8 fronting Gore Street and the remaining grounds to form two lots. One lot is retained as Pallister and forms its heritage curtilage the other contains the current hospital buildings. Apart from Pallister house most of the elements still on site today date from the period of use as Greenwich Hospital. Construction of the first phase of the hospital buildings began in 1963 when the site was under control of the Home of Peace Hospitals. The main hospital buildings and associated administration and accommodation were built in the 1960s with the hospital being opened in 1966. Additional landscaping and service installation would also have taken place further reducing the potential for Aboriginal objects to be preserved. The most recent edition was constructed in 1997. HammondCare have operated the hospital since 2008. Figure 5 and Figure 6 show the 1943 and present layout of the site respectively.

The extent of ground surface disturbance is a major factor in determining whether physical evidence of past Aboriginal occupation of an area will be present. In general, past activities provide an indication of the level of disturbance and correlate to

archaeological potential. Table 4 provides a key to levels of disturbance and the likely archaeological potential.

**Table 4: Levels of past land disturbance**

Disturbance Level	Types of Past Activities	Examples in Study Area
<b>HIGH</b> Severe soil disturbance little potential for survival of intact archaeological deposits, displaced objects rarely still occur.	Construction of buildings, graded roads (depending on depth of soils), service trenches for sewers etc., dams, high erosion, intensive and/or repeated landscaping or cultivation.	Hospital building footprints and landscaped areas, access roads and services.
<b>MODERATE</b> Some disturbance to soils with some potential for intact archaeological deposits and/or potential for displaced Aboriginal objects.	Clearing or partial clearing, stock activity, light cultivation or ploughing, low erosion.	The eastern portion of Lot 4 DP 584287. This land has been partially cleared and is likely to have been subject to some erosion. However, there is no construction in this area and some potential for intact deposit within rock overhangs.
<b>LOW</b> Partially cleared or grazed, not subject to intensive soil disturbance or erosion therefore retaining potential for intact deposit and objects.	Non-mechanical clearing, stock grazing, either a depositional soil environment or minimal erosion.	Due to erosion it is unlikely that there are areas of low disturbance in the project area.

**Figure 5: 1943 aerial photograph of the project area and surrounds (Source: <https://maps.six.nsw.gov.au/>)**



**Figure 6: Aerial photo of the project area (Source: <https://maps.six.nsw.gov.au/>)**





## 6.2 SITE DESCRIPTION

Within the project area the portion of land within the existing hospital footprint has been significantly disturbed from past construction. The areas adjacent to buildings consist predominantly of manicured lawns and garden plantings. Cut and fill has taken place to create level surfaces. The western approximately three quarters of the site has been subject to disturbance from the construction of hospital buildings, roads, services and landscaping including cut and fill earthworks. There is low to negligible Aboriginal archaeological potential within these developed areas. The perimeter of the site is characterised by remnant vegetation that contributes to the character of the site and provides a visual buffer from surrounding areas.

The project area is sloping in nature and does not include a significant water source. Although Gore Creek is within 100 metres, the project area is elevated above the creek at the top of a steep slope. It is therefore unlikely to have been a favoured camping location.

At the eastern boundary of the site is an area of bushland that does not appear to have been previously developed (with the exception of the access road that cuts through the area from St Vincents Road). There is a row of sandstone overhangs at the top of the area and the area slopes steeply down to St Vincents Road. The overhangs are more pronounced to the south of the access road. Ground surface visibility is low and some of the rock overhangs are inaccessible due to vegetation. None of the overhangs appears to be large (Figure 7). These rock overhangs have some archaeological potential. To the north of the access road much of the face of the slope has been covered with mulch and landscaping fill (Figure 8 & Figure 9). It is not possible to be certain whether there are rock overhangs under this fill. It is possible that there are some small overhangs under the ground cover.

**Figure 7: Vegetated area with rock overhangs south of access road**





**Figure 8: Slope with zero natural ground surface visibility north of access road**



**Figure 9: Slope to the immediate north of the access road with sandstone**





No Aboriginal objects have been recorded during inspections of the area in 2018 or 2021. No culturally modified trees were located in the project area. No landforms of high archaeological sensitivity were noted within the project area. The majority of the project area is highly disturbed. There is some potential for Aboriginal objects within the vegetated bushland at the eastern boundary of the site. In this area of less disturbance, the shallow and erosion prone nature of the soils suggest there is unlikely to be moderate or high density intact archaeological deposit in open areas. If sites were to occur, they would most likely be in the rock overhangs. The area of moderate archaeological potential is shown in Figure 3. Any sites in this area would likely be low density artefact scatters or possibly rock art within the rock overhangs.

## 7.0 IMPACT ASSESSMENT

The following definitions of harm are reproduced from OEH (2011).

### **Direct harm/impact**

Direct harm may occur as the result of any activity which disturbs the ground including, but not limited to, excavation of soils, site preparation activities, installation of services and infrastructure, roadworks, excavating detention ponds and other drainage or flood mitigation measures, and changes in water flows affecting the value of a cultural site.

### **Indirect harm/impact**

Indirect harm may affect sites or features located immediately beyond, or within, the area of the proposed activity. Examples of indirect impacts include, but are not limited to, increased impact on art in a shelter site from increased visitation, vibration impacts to rock shelters from construction equipment, destruction from increased erosion and changes in access to wild food resources. (OEH 2011).

## 7.1 DESCRIPTION OF THE PROPOSED DEVELOPMENT

The proposed redevelopment of Greenwich Hospital has been designed to increase the service potential and amenity of the site. This project proposal comprises of health, residential care, seniors living and community facilities. The site will welcome a mix of residents and patients, catering for a range of needs from retired active seniors through to the vulnerable and frail. The development will comprise of two medium rise seniors living building, a high-rise health, wellness, and residential care building along with a low-rise respite facility. The design of these facilities intends to sensitively respond to the existing heritage precinct and unique natural landscape. Pallister House will continue to serve as a health training facility complementing the new buildings with strong visual and physical links to the proposed community and health functions.

The key objectives of the Greenwich Development are as follows:

- To create a new Health and Seniors Living campus which shifts away from the institutional design model, and instead represents a homely environment which is well integrated with the wider community.
- To increase capacity to continue to meet the local need for frail aged residential service.
- To continue and enhance specialised health service offerings such as rehabilitation, palliative and supportive care, pain management, mental health care for older people, community and other vital support services.
- To enhance the natural landscape of the Greenwich site to provide a high-quality, welcoming space for residents, patients and the wider community.
- To enhance heritage precinct landscape and create strong relationships between the site, Pallister House, and the proposed buildings.
- Construction of a new hospital facility and integrated healthcare campus comprising of hospital, residential aged care, seniors housing, overnight respite, across:
  - A new main hospital building up to RL 80.0;

- Two new seniors living buildings, Northern building up to RL 56.36, and Southern building up to RL 60.65;
- A new 2-3 level respite care building up to RL 56.9;
- Construction of associated site facilities and services, including pedestrian and vehicular access and basement parking;
- Site landscaping and infrastructure works; and
- Preservation of Pallister House which will continue to host dementia care and administrative functions.

Development activities with the potential to disturb the ground surface include:

- The demolition of existing buildings and structures on site (excluding Pallister House which will be retained in its current form)
- Earthworks including excavation, and remediation works;
- Some tree removal and replacement; and
- Other service and landscaping works.

Plans of the existing site configuration and the proposed development are included in Appendix 1.

Demolition and excavation for construction will have an impact on the ground surface. Additional service infrastructure and water management will also require ground disturbance. Indirect impacts could include increased site use from additional residential development, particularly in the eastern, currently undeveloped, portion of the project area.

## **7.2 JUSTIFICATION OF THE OBJECTIVES OF THE PROPOSED ACTIVITY**

The long-term vision for the site involves transforming the Greenwich Hospital from a dated 1960s facility which is no longer fit for purpose into an integrated, contemporary healthcare campus. This will incorporate specialised care services for seniors and people with complex health needs to meet the growing community demand in the Northern Sydney Local Health District (NSLHD). The new Greenwich Health Campus moves away from traditional, siloed models of sub-acute services to better respond to the changing needs of the ageing community, consistent with the NSW State Health Plan – Toward 21 which focuses on delivering integrated and connected health care. This is proposed to be done through HammondCare’s innovative ‘continuum of care’ model involving the expansion and integration of specialised health services, and short, medium and long-term accommodation options.

## **7.3 POTENTIAL HARM TO ABORIGINAL OBJECTS**

The development of the site will include construction of buildings and associated ancillary infrastructure, landscaping and demolition. This will involve cutting and removal of soils as well as soil disturbance. These activities would be likely to disturb or damage any Aboriginal objects that might be present.

Within the portion of land identified as having moderate archaeological potential development impacts have been minimised (see Section 7.4 below).



### 7.3.1 Impacts to Declared Aboriginal Places

No Aboriginal Places have been declared within the project area.

### 7.3.2 Previous AHIPs issued

There have been no previous AHIPs issued for the project area.

## 7.4 IMPACT MITIGATION

No Aboriginal objects have been recorded and the archaeological assessment has concluded that there is a low potential for unrecorded object to occur over much of the project area. Direct impacts on Aboriginal heritage have been minimised by locating the majority of new buildings within previously disturbed areas.

Within the identified area of moderate archaeological potential, development is limited to one building that will employ a structural system to avoid extensive excavation.

Figure 10 shows the area of moderate archaeological potential overlaid on the proposed development layout. The respite building is the only part of the proposed development that will have an impact in this area. The original concept design included multiple low-density buildings within the area assessed as having moderate archaeological potential. The reduction of impact in this area and the revision to avoid construction in the area to the south of the access road to St Vincents Road has lessened potential impacts.

To further reduce the impacts of the proposed respite building the relevant recommendations of the previous ACHAR and the development consent conditions should be implemented. This is discussed further in Section 8.0, but should include, sub-surface archaeological testing within the area of moderate potential, in areas subject to direct impact from the proposed building as well as a document to manage impacts and heritage for the project area during and after construction, and consideration of opportunities for interpretation and education to highlight the past Aboriginal occupation of the area and its cultural values.

**Figure 10: Proposed development - area of moderate archaeological potential hatched**



## 8.0 ONGOING MANAGEMENT

This section provides a summary of how statutory requirements for the project have been addressed and a discussion of the ongoing Aboriginal archaeological and cultural heritage management requirements.

### 8.1 ADDRESSING SSD REQUIREMENTS

The SEARS for SSD application 8699 included:

#### **Key issue 11 - Aboriginal Heritage**

*Where relevant, address Aboriginal Cultural Heritage in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.*

This was undertaken during the full ACHAR process (see CHC 2018). This document provides an update to the ACHAR to include re-commenced Aboriginal consultation for the project and a revised impact assessment in line with the same guidelines and requirements.

The SSD application, including the ACHAR, was reviewed and approved with conditions including the following relevant to Aboriginal heritage:

#### **Condition B13 Revised archaeological impact assessments**

*All future development applications for new built form must demonstrate how the archaeological significance on the Site has been avoided and the impacts the development may have on this significance. This assessment must consider both Aboriginal and non-Aboriginal archaeological impacts.*

This report addresses the Aboriginal heritage component of this requirement. The non-Aboriginal heritage is discussed in a separate report. A discussion about mitigation of impacts is included above in Section 7.0.

#### **Condition B15 ACHMP**

*An Aboriginal Heritage Management Plan, prepared in consultation with Registered Aboriginal Parties and EESG, that has been informed by sub-surface testing as per the recommendations of the ACHAR, must be submitted with future applications for new built form within areas with moderate potential for archaeological resources.*

A separate Aboriginal Cultural Heritage Management Plan (ACHMP) is being prepared as part of the current project phase and will include information from sub surface testing, where appropriate.

#### **ACHAR Recommendations**

Additionally, the SEARs for SSD 136119238 include the requirement to:

*Demonstrate that the recommendations of the Aboriginal Cultural Heritage Assessment Report approved under SSD-8699 have been addressed in the proposed development.*

The recommendations of the ACHAR approved under SSD-8699 are as follows:

- 1) In the parts of the project area assessed as having low archaeological potential and low potential to contain Aboriginal objects, it is recommended that there are no objections to the development on Aboriginal archaeological grounds.
- 2) In the area identified as having moderate archaeological potential (Figure 3) impacts should be minimised.
  - a) If rock overhangs are uncovered / made accessible during landscaping works further archaeological inspection should be undertaken to determine whether Aboriginal objects are present. If necessary, a cultural heritage management plan should be put in place to prevent unforeseen indirect or direct impacts to Aboriginal objects.
  - b) As development consent is being sought for Concept Plan approval, development impacts in the area of moderate archaeological potential can be minimised by design refinements, if required, at the subsequent detailed DA stage. These design refinements could include minor repositioning of building footprints; and/or a pier and beam structural system to avoid extensive excavation. Many trees in the area will be retained and disturbance to ground surface area will be kept to a minimum. In light of this, the likelihood of impact to Aboriginal objects in this area is low. When the development footprint and construction methods are finalised, impacts should be managed via a construction management plan.
  - c) Consideration should be given to interpretation of cultural values to be incorporated in to the open space areas within the development.
- 3) A protocol should be put in place to deal with any unexpected Aboriginal objects that may be located during the course of the project. This should be included in the construction management plan or equivalent documentation. A draft protocol is presented below.
- 4) In the extremely unlikely event that suspected human remains are found the *Coroners Act 2009* requires that all work must cease, the site should be secured and the NSW Police and the NSW Coroner's Office should be notified. If the remains are found to be Aboriginal pre-contact period, Heritage NSW and the Metropolitan LALC should be contacted to assist in determining appropriate management.

#### ***Draft Protocol - Ongoing management to protect Aboriginal Objects***

The following is a suggested procedure to deal with unexpected finds during the life of the project.

- On-site employees or contractors involved in ground surface disturbance should be made aware of the statutory obligations that apply to the discovery of Aboriginal objects prior to the commencement of works.
- If a suspected Aboriginal object is located during construction, works should cease in the vicinity of the find and a fully qualified archaeologist with experience in archaeological excavation and identifying Aboriginal objects and should be called to site to determine the nature of the object.

- If it is confirmed that it is an Aboriginal object and it is in an isolated context (i.e. it is not likely that *in situ* deposit or further items will be present), its location can be recorded and it can be removed and the works continue. The RAPs should be contacted regarding appropriate long-term management of the object.
- If it is confirmed that it is an Aboriginal object and it is suspected that further material or in situ deposit could be present the RAPs should be contacted to determine an appropriate excavation strategy to salvage the in situ objects.
- Consideration should be given to relocating any Aboriginal objects removed from the site back into a secure place within the project area.
- If the item is found to not be an Aboriginal object, works may continue.

Recommendation 1 does not require addressing further. This provided guidance on the parts of the site which, due to prior disturbance, would not be likely to contain Aboriginal objects. The majority of new construction is contained in these areas under the revised design.

Recommendation 2 a & c will be addressed in the ACHMP for the site and the interpretation plan that is also being prepared as part of this phase of the project.

Recommendation 2 b has been addressed in the redesign of the development proposal since the concept design phase. Buildings in the area of moderate archaeological potential have been reduced and only one building is now proposed within this area in the new design. Construction methods for this building will be designed to minimise ground surface impacts. As further mitigation of potential impacts from the building, additional inspection will be undertaken in the area when ground cover is cleared, and detailed construction impacts are understood. Sub-surface testing will also be undertaken in areas where impacts cannot be avoided and sufficient soil depth remains for potential preservation of Aboriginal objects (see revised recommendations below).

Recommendations 3 & 4 and the draft protocol for unexpected finds will be incorporated into the ACHMP being prepared for the site. The ACHMP and interpretation plan will also incorporate any findings from sub-surface testing within the area.

## **8.2 REVISED RECOMMENDATIONS**

On the basis of the findings of the ACHAR (CHC 2018), the revised archaeological impact assessment (this document) and the legislative framework for protecting and assessing Aboriginal archaeological sites in NSW, the following recommendations are provided:

- 1) The recommendations from the ACHAR (CHC 2018), 2a, 3 & 4 (as above) should be incorporated into the ACHMP being prepared for the Greenwich Hospital Site, following archaeological test excavations.
- 2) The recommendation from the ACHAR (CHC 2018), 2c (as above) should be addressed in the interpretation plan being prepared for the Greenwich Hospital Site.

- 3) Input should be sought from the RAPs regarding the appropriate interpretation of cultural values to be included within the interpretation plan. Where possible, consideration should be given to opportunities for Aboriginal owned organisations or individuals creating content for any interpretive material and providing ongoing maintenance services. For example, art work from local Aboriginal artists or maintenance of bush tucker gardens etc.
- 4) A methodology and research design for sub-surface archaeological testing in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW. Part 6 National Parks and Wildlife Act 1974* has been prepared and is included in Appendix 2. RAPs have had 28 days to review the methodology along with this revised report. All the RAPs have endorsed the methodology. The testing should be undertaken prior to ground surface disturbance for construction.
- 5) Findings of the testing undertaken under the methodology described in recommendation 4 above, should be incorporated into the interpretation plan and the ACHMP and be used to inform the mitigation measures during construction and ongoing management of Aboriginal Cultural Heritage at the Greenwich Hospital site.

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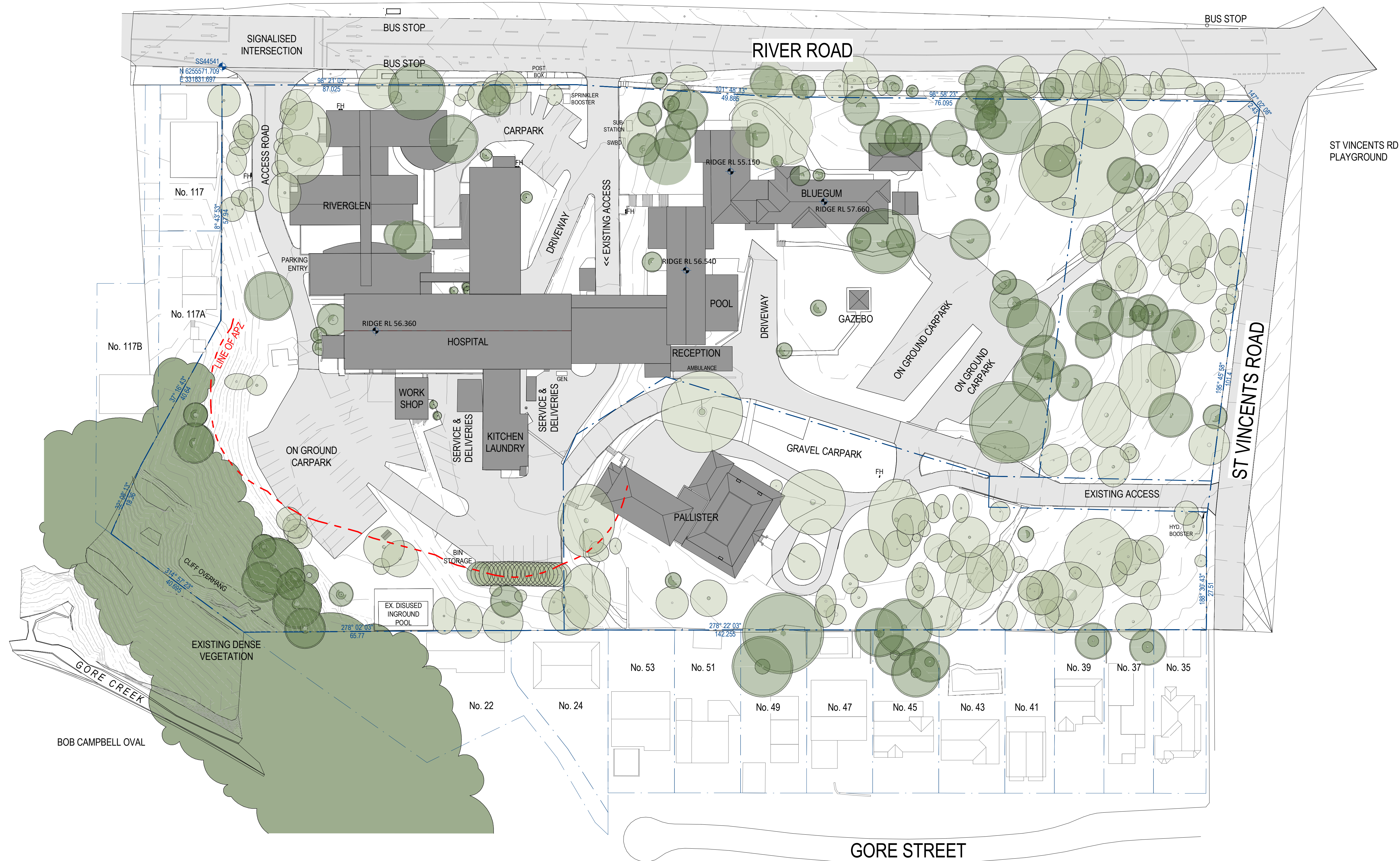
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## **APPENDIX 1: DEVELOPMENT PLANS**



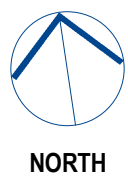


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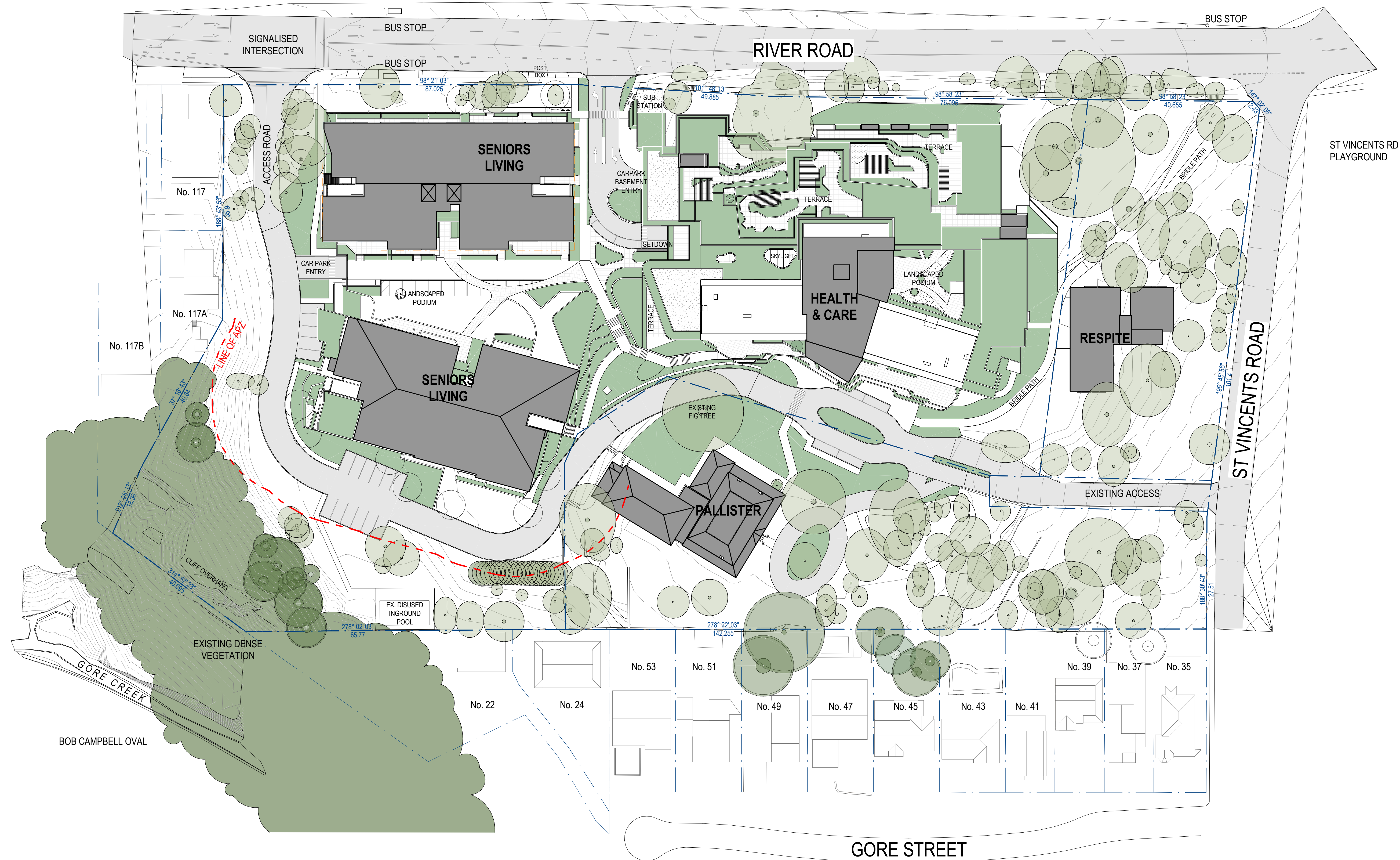
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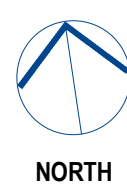
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## **APPENDIX 2: ARCHAEOLOGICAL TESTING METHODOLOGY**

## 1.0 TESTING METHODOLOGY

Testing will be carried out in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010).

### 1.1 TESTING LOCATION STRATEGY

A portion of the project area has been identified as having moderate potential to contain Aboriginal objects (Figure 3). Test pits would be limited to the area of moderate potential that will also be subject to disturbance from construction of the respite building (Figure 10). Once the detailed construction plans are available the extent of impact will be mapped, and a flexible grid developed to position test pits within the impact area.

Localised disturbances will influence the exact location of testing. If grid determined locations are shown to have limited potential for archaeological deposit, the pits will be moved, subject to the limitations of the requirements of the *Code of Practice*. It is assumed that the excavation director and the RAPs will confirm the testing locations on site. A degree of flexibility will be required to ensure the area can be tested.

The portion of the project area with potential to contain sub-surface Aboriginal objects is currently largely covered in vegetation and leaf litter. It is likely that some additional material has been introduced to cover the slope, possibly obscuring parts of the sandstone overhang that is visible to the south.

The testing process will include, where necessary, monitoring the removal of uppermost introduced ground cover to determine the extent, if any, of original soil deposit. Based on this, an assessment will be made to identify areas that have potential archaeological deposit. Areas for testing may be within or outside any sandstone overhang. Results from initial test pits will be used to inform whether further pits are necessary.

### 1.2 TESTING METHODS

The test pits would be excavated according to Requirements 16 and 17 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*.

- Any test excavation point will be separated by at least 5 m.
- Test excavations units will be excavated using hand tools only.
- Test excavations will be excavated in 50 cm x 50 cm units.
- The first excavation unit will be excavated and documented in 5 cm. Based on the evidence of the first excavation unit, 10 cm spits or sediment profile/stratigraphic excavation (whichever is smaller) may then be implemented.
- All material excavated from the test excavation units will be sieved using a 5 mm aperture wire-mesh sieve.
- Test excavation units will be excavated to at least the base of the identified Aboriginal object-bearing units and will continue, where necessary, to confirm the soils below are culturally sterile.

- Photographic and scale-drawn records of the stratigraphy/soil profile, features and location records for informative Aboriginal objects will be made for each single excavation point.
- If unusual densities of artefacts or other significant features or artefact types are located, excavation units may be expanded up to an area not larger than three square metres, using 50cm x 50 cm units.
- Test excavations units will be backfilled as soon as practicable.
- Following test excavation, an Aboriginal Site Impact Recording form will be completed and submitted to the AHIMS Registrar as soon as practicable, for any AHIMS site recorded during the test excavation

### 1.2.1 Notification

Notification will be provided to Heritage NSW at least 14 days before undertaking any test excavations. Notification will include a copy of this methodology once finalised.

## 1.3 ARTEFACTS

All artefacts will be collected, bagged, and labelled with location information. During testing, recovered artefacts may be temporarily stored in a lockable shipping container which will be present on-site for the duration of works. During detailed artefact recording, recovered artefacts will be temporarily stored in a locked storage at 11/165 Allen Street Leichhardt, NSW. If artefacts require additional analysis they may be transported for temporary assessment to a secure location.

### 1.3.1 Stone Artefact Attributes to Be Recorded

The table below lists the attributes to be recorded on each Aboriginal artefact recovered during archaeological investigations and has been separated into general attributes to be recorded on all artefacts, additional attributes to be recorded on flakes, and additional attributes to be recorded on cores.

**Table 1: Artefact attributes to be recorded**

<b>General Attributes (All artefacts)</b>	<b>Additional Attributes (Flakes)</b>	<b>Additional Attributes (Cores)</b>
Artefact Type	Platforms (width, thickness, surface, overhang removal)	Rotated
Raw Material	Termination	Platform Preparation
Artefact Weight (g)	Retouch (Location and Type)	Scar Type
Artefact Measurements (Length, Width, Thickness)	Breakage	Exhausted



Cortex (Amount and Type)		
Heat Affect		

If certain artefacts display attributes requiring specialist analysis, such as use wear or potential for residue analysis, we will consult with RAPs for these specialist analyses to be undertaken at a research institution or by a specialist consultant, prior to finalisation of post excavation reporting.

### 1.3.2 Care & Control

The ultimate care and control of any artefacts following archaeological excavations will be discussed further with the RAPs for the project. The following options are presented as suggestions only.

#### Option 1

Artefacts recovered during testing will be reburied on site. This will include all records and storage requirements as outlined in Requirement 26 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*. An AHIMS site card would be submitted to record the location of the artefacts.

#### Option 2

A care and control agreement is entered into by a RAP organisation or individual for ongoing care of the artefacts.

#### Option 3

It is unlikely that the Australian Museum will accept any artefacts recovered. If no alternative arrangement can be made attempts will be made to lodge artefacts with the Australian Museum as legally required.

## APPENDIX 3: CONSULTATION SUMMARY TABLES

Stage # of the ACHRS	Step #	Description of Step in the ACHRS	How this step of the ACHRS was complied with
<i>1: Notification of project proposal and registration of interest</i>	1a	<p>Proponents must compile a list of Aboriginal people who have an interest in the proposed project area and hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places from reasonable sources of information which include writing to:</p> <ol style="list-style-type: none"> <li>1. The relevant DECCW EPRG regional office (now Heritage NSW);</li> <li>2. The relevant Local Aboriginal Land Council;</li> <li>3. The National Native Title Tribunal;</li> <li>4. Native Title Services Corporation;</li> <li>5. Relevant local council (s); and</li> <li>6. Relevant catchment management authorities (now LLS).</li> </ol>	<p>Letters were sent via email on behalf of the proponent on 14 July 2021, to all of these organisations (or their updated equivalents) requesting their input on the names and contact details of Aboriginal people who may have an interest in the proposed project area and hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places within the locality of the project area.</p> <p>A closing date of 30 July 2021 was provided to all agencies for a response to this letter.</p>
	1b	<p>Proponent prepares a notification via newspaper which must include:</p> <p>The name and contact details of the proponent;</p> <ul style="list-style-type: none"> <li>▪ A brief overview of the proposed project that may be the subject of an application for an AHIP, including the location of the proposed project;</li> <li>▪ A statement that the purpose of community consultation with Aboriginal people is to assist the proposed applicant in preparing an application for an AHIP and to assist the Director General of OEH in his/her consideration and determination of the application;</li> <li>▪ An invitation for Aboriginal people who hold knowledge relevant to determining the cultural significance of Aboriginal object(s) and/or place(s) in</li> </ul>	<p>A notification, which complied with these requirements, was placed in the Public Notices section of the <i>North Shore Times</i>, Thursday 15 July, 2021 with a closing date for registration of interest included as Friday 30<sup>th</sup> July 2021.</p>

Stage # of the ACHRS	Step #	Description of Step in the ACHRS	How this step of the ACHRS was complied with
		the area of the proposed project to register an interest in a process of community consultation with the proposed applicant regarding the proposed activity; and <ul style="list-style-type: none"> <li>A closing date for the registration of interests.</li> </ul>	
	1c	Proponent writes to the Aboriginal people whose names were provided by organisations in Step 1a to notify them of the proposed project and opportunity to be involved in consultation and places notification in the local newspaper.	Letters were sent to all Aboriginal people provided by organisations (unless they had registered interest already) via email and/or express post on 30 July 2021. Closing date for registrations was, 13 August 2021.  Letters were also sent to all 17 previously identified RAPs on the same date.
	1d	Proponent records names of Aboriginal people who have registered an interest in being involved in consultation – the ‘registered Aboriginal parties’	A list of the registered Aboriginal parties, was recorded as detailed in Section 5.0.
	1e	Proponent provides a copy of the notification and record of the registered Aboriginal parties to OEH and relevant LALC within 28 days of the closing date for registering an interest.	An email was sent to the Metropolitan Local Aboriginal Land Council and to Heritage NSW on 24-25 August 2021 with the names of all groups who had consented to have their details provided.
<i>2: Presentation of the information about the proposed project</i>	2a	Proponent presents and/or provides project information to registered Aboriginal parties.	Project information and a draft project methodology was sent to all RAPs on 11 October 2021. It was sent via email to all RAPs. Deadline for comment on the information was set for 8 November 2021.

Stage # of the ACHRS	Step #	Description of Step in the ACHRS	How this step of the ACHRS was complied with
	2b	Proponent may create an opportunity for registered Aboriginal parties to visit the proposed project site.	This was offered. No site visit was requested.
	2c	Proponent records or documents that information on the proposed project has been presented. The record or documentation should include any agreed outcomes and/or contentious issues that may require further discussion (where applicable). Proponent should provide a copy of this record or documentation to registered Aboriginal parties.	Project information and a draft project methodology was sent to all RAPs on 11 October 2021. It was sent via email to all RAPs. Deadline for comment on the information was set for 8 November 2021. No contentious issues were recorded.
<i>3: Gathering information about cultural significance</i>	3a	Proponent presents and/or provides the proposed methodology (s) for the cultural heritage assessment to the registered Aboriginal parties for comment. Registered Aboriginal parties have a minimum of 28 days after the proponent provides the methodology (s) to provide written or oral comment.	Project information and a draft project methodology was sent to all RAPs on 11 October 2021. It was sent via email to all RAPs. Deadline for comment on the information was set for 8 November 2021.
	3b	Proponent considers input provided by registered Aboriginal parties and finalises methodology for implementation. Proponent documents how the input has been considered.	Section 5.2.3 details the comments received.
	3c	Proponent seeks information from registered Aboriginal parties to identify : <ul style="list-style-type: none"> <li>a. Whether there are any Aboriginal objects of cultural value; and</li> <li>b. Whether there are places of cultural value (whether or not they are Aboriginal places declared under Section 84 of the NPW Act).</li> </ul>	No specific objects of cultural value were identified by RAPs. The project area was included in land that has high cultural value for Aboriginal people. Further comments are included in Section 5.0.
	3d	Proponent seeks input from registered Aboriginal parties on	This has been undertaken and will continue as

Stage # of the ACHRS	Step #	Description of Step in the ACHRS	How this step of the ACHRS was complied with
		potential management options	archaeological testing and management planning is undertaken. To date the RAPs support the assessment and management methods proposed.
<i>4: Review of draft cultural heritage assessment report</i>	4a	Proponent prepares draft cultural heritage assessment report and provides it to the registered Aboriginal parties for review and comment.	Provided 14/1/2022
	4b	Registered Aboriginal parties have a minimum of 28 days after the proponent provides the draft report to review and provide written or oral comment.	Closing date for comment 11/2/2020
	4c	Proponent finalises cultural heritage assessment report. The final report is submitted to Heritage NSW for consideration with the proponent's AHIP application.	Report finalised in April 2022 for submission with development application.
	4d	Proponent provides/makes available the final cultural heritage assessment report and AHIP application (if required) to the registered Aboriginal parties, relevant LALCs within 14 days of an AHIP application being made to Heritage NSW (if required).	Report copy provided to RAPs April 2022. As the project falls under SSD no AHIP application is required.

## Previous (2018) Consultation – Summary Table

Stage # of the ACHRS	Step #	Description of Step in the ACHRS	How this step of the ACHRS was complied with
<i>1: Notification of project proposal and registration of interest</i>	1a	Proponents must compile a list of Aboriginal people who have an interest in the proposed project area and hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places from reasonable sources of information which include writing to: <ul style="list-style-type: none"> <li>7. The relevant DECCW EPRG regional office;</li> <li>8. The relevant Local Aboriginal Land Council;</li> <li>9. The National Native Title Tribunal;</li> <li>10. Native Title Services Corporation;</li> <li>11. Relevant local council (s); and</li> <li>12. Relevant catchment management authorities.</li> </ul>	Letters were sent on behalf of the proponent on 22 June 2018, to all of these relevant organisations (via email and/or express post) requesting their input on the names and contact details of Aboriginal people who have an interest in the proposed project area and hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places within the locality of the project area. As catchment management authorities no longer exist a reply was provided by Greater Sydney Local Land Service  A closing date of 12 July 2018 was provided to all agencies for a response to this letter.
	1b	Proponent prepares a notification via newspaper which must include:  The name and contact details of the proponent; <ul style="list-style-type: none"> <li>▪ A brief overview of the proposed project that may be the subject of an application for an AHIP, including the location of the proposed project;</li> <li>▪ A statement that the purpose of community consultation with Aboriginal people is to assist the</li> </ul>	A notification, which complied with these requirements, was placed in the Public Notices section of the <i>North Shore Times</i> , Friday 28 June with closing date for registration of interest included as 14 days from publication (Wednesday 12 July 2018). A copy was included.



Stage # of the ACHRS	Step #	Description of Step in the ACHRS	How this step of the ACHRS was complied with
		<p>proposed applicant in preparing an application for an AHIP and to assist the Director General of OEH in his/her consideration and determination of the application;</p> <ul style="list-style-type: none"> <li>An invitation for Aboriginal people who hold knowledge relevant to determining the cultural significance of Aboriginal object(s) and/or place(s) in the area of the proposed project to register an interest in a process of community consultation with the proposed applicant regarding the proposed activity; and</li> <li>A closing date for the registration of interests.</li> </ul>	
	1c	Proponent writes to the Aboriginal people whose names were provided by organisations in Step 1a to notify them of the proposed project and opportunity to be involved in consultation and places notification in the local newspaper.	Letters were sent to all Aboriginal people provided by organisations (unless they had registered interest already) via email and/or express post on 11 July 2018. Closing date for registrations was, 26 July 2018.
	1d	Proponent records names of Aboriginal people who have registered an interest in being involved in consultation – the ‘registered Aboriginal parties’	Table 3 provides a list of the registered Aboriginal parties, who provided registration of interest for this project.
	1e	Proponent provides a copy of the notification and record of the registered Aboriginal parties to OEH and relevant LALC within 28 days of the closing date for registering an interest.	An email was sent to the Deerubbin Local Aboriginal Land Council and to OEH (via <a href="mailto:gs.ach@environment.nsw.gov.au">gs.ach@environment.nsw.gov.au</a> ) on 5 August 2018 with the names of all groups who had consented to have their details provided.
2: Presentation of the information about the	2a	Proponent presents and/or provides project information to	Project information and a draft project methodology was sent to all RAPs on 31st July

Stage # of the ACHRS	Step #	Description of Step in the ACHRs	How this step of the ACHRS was complied with
<i>proposed project</i>		registered Aboriginal parties.	2018. It was sent via email to all RAPs apart from Darug Aboriginal Cultural Heritage Assessments, who had not provided email addresses. This was sent by express post and followed up by telephone.
	2b	Proponent may create an opportunity for registered Aboriginal parties to visit the proposed project site.	All RAPs were invited to attend a site meeting on 5 September 2018. Two representatives of Butucarbin Aboriginal Corporation attended.
	2c	Proponent records or documents that information on the proposed project has been presented. The record or documentation should include any agreed outcomes and/or contentious issues that may require further discussion (where applicable). Proponent should provide a copy of this record or documentation to registered Aboriginal parties.	No contentious issues were raised this stage during the project information presentation stage or the consultation process for the assessment. As there were no defined impacts or contentious issues, no agreed outcomes were noted.
<i>3: Gathering information about cultural significance</i>	3a	Proponent presents and/or provides the proposed methodology (s) for the cultural heritage assessment to the registered Aboriginal parties for comment. Registered Aboriginal parties have a minimum of 28 days after the proponent provides the methodology (s) to provide written or oral comment.	Project information and a draft project methodology was sent to all RAPs on 31st July 2018. Further information was provided in the report.
	3b	Proponent considers input provided by registered Aboriginal parties and finalises methodology for implementation. Proponent documents how the input has been considered.	Project methodology was finalised without change.
	3c	Proponent seeks information from registered Aboriginal parties to identify :	Along with the presentation of project information, the draft proposed project methodology and the draft report invitations

Stage # of the ACHRS	Step #	Description of Step in the ACHRS	How this step of the ACHRS was complied with
		<p>c. Whether there are any Aboriginal objects of cultural value; and</p> <p>d. Whether there are places of cultural value (whether or not they are Aboriginal places declared under Section 84 of the NPW Act).</p>	<p>were provided to discuss these issues.</p> <p>No advice was received from RAPs that any objects or places of cultural value are present within the project area.</p>
	3d	Proponent seeks input from registered Aboriginal parties on potential management options	No Aboriginal objects were identified and no management of tangible heritage required. No intangible heritage requiring management was identified by RAPs.
<i>4: Review of draft cultural heritage assessment report</i>	4a	Proponent prepares draft cultural heritage assessment report and provides it to the registered Aboriginal parties for review and comment.	Completed and provided to the RAPs.
	4b	Registered Aboriginal parties have a minimum of 28 days after the proponent provides the draft report to review and provide written or oral comment.	Reports sent 29/10/2018 with a closing date for comments of 27/11/2018.
	4c	Proponent finalises cultural heritage assessment report. The final report is submitted to OEH for consideration with the proponent's AHIP application.	Report finalised. No requirement for AHIP or submission to OEH at this stage of the project.
	4d	Proponent provides/makes available the final cultural heritage assessment report and AHIP application (if required) to the registered Aboriginal parties, relevant LALCs within 14 days of an AHIP application being made to OEH (if required).	No AHIP application required. Report will be made available to RAPs.