

2A Gregory Place Harris Park New South Wales

Build to Rent Affordable Housing State Significant
Development (SSD-31179510)



Aboriginal Cultural Heritage Assessment Amendment Report

Report to
2A Gregory Place Pty Ltd

dominic steele consulting archaeology
December 2025

Acknowledgement

We acknowledge the traditional custodians of the Country on which this project is located and we pay our respects to elders past and present.

Document control

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Report summary

This Aboriginal Cultural Heritage Assessment Amendment Report has been prepared in consultation with Aboriginal community groups to inform the proposed development of the 2A Gregory Place site in Harris Park as a build to rent and affordable housing State Significant Development. This report addresses the Planning Secretary Environmental Assessment Requirements (SSD-31179510) that have been issued for the proposal and has been updated in response to changes that have been made to the scheme and comments that have been raised through public comments and the state design review panel and as a result of stakeholder engagement.

Our understanding of Country

Harris Park is located on the backplain of the Parramatta River floodplain and was likely a well-watered and lightly wooded grassland landscape in 1788. We use historical records and landscape analysis and mapping to reconstruct the place in 1788 as likely featuring chain of ponds drainage and swampy meadows formation vegetation.

Archaeological status of the site

The site is located outside of the known occurrence and distribution of the PSB and there are not any previously recorded AHIMS on the site. The site is however situated in a potentially sensitive Aboriginal archaeological landform context on Clay Cliff Creek and beneath the existing factory buildings there is a deep alluvial sedimentary profile that may contain Aboriginal objects.

On this basis, it is possible that evidence for past Aboriginal visitation is present below the 2A Gregory Place site but there is insufficient evidence to predict what may be present or survive given the depth of disturbance to the original ground surfaces that have resulted from modern building.

Colonial land use Impacts to the potential Aboriginal archaeological resources at the site

The open and ‘park like’ appearance of the lightly wooded grassland at Aboriginal Parramatta in 1788 is believed to have been shaped and maintained by Aboriginal people over millennia using fire management). British occupation of Country displaced the traditional owners and colonial land clearance, building, agriculture, and stock grazing led to the loss of swamps and wetlands, native grasses and trees, erosion and loss of soils, and the entrenchment of drainage flows into continuous ‘creek’ channel forms

Historical records for the land in the second half of the nineteenth century are sparse, but the watercourse appears to have continued to retain recognisable ponding form in parts of former Harris Estate until 1850s. Urbanisation from late 1870s led to deterioration of the Clay Cliff Creek environment (flooding and unsanitary conditions). By the early 1890s construction works had begun to manage the land and confine the watercourse into a stormwater drain. The section of the Clay Cliff Creek concrete channel drain that crosses the site was built c.1917.

Archaeological impact of the 1950s factory construction

Bulk excavation and progressive building constructions for the factory from the 1950s have resulted in the lowering of the 1950s ground levels by about 1.5m across the site with deeper excavations below some of the the larger buildings and the construction of the stormwater channel (6m wide and 3m deep) has also had a deep impact. Geotechnical data for the site shows below the factory are thick deposits of uncontrolled fill (1.5m) that are underlain by two units of floodplain deposit that comprise soft to firm silty clay alluvium (5.9m thick) over bedrock.

Predicted archaeological survival at the site

There is a possibility soil and sediments that occur below levels of historical disturbance may contain Aboriginal objects. However, the land use history of the 2A Gregory Place site that comprised continuous agriculture for 150 years followed by industrial building construction has resulted in the destruction of the original chain of ponds drainage and removal of original ground surfaces. Geotechnical data for the site show that most parts of the property have been deeply cut down by the 1950s factory construction and to depths of approximately 1.5m and deeper below the main building of the former factory.

Archaeological constraints

Archaeological test excavation to establish whether Aboriginal objects are present at the site is not practicable or appropriate at this time because the undertaking of subsurface testing of soils and sediments with potential to contain Aboriginal objects will require approval to demolish buildings and remove large amounts of potentially contaminated fills to reach depths required (at least 1.5m) to archaeologically investigate in situ deposits. The archaeological investigation strategy that is developed for the site needs to be first informed by the results of future contamination assessment and requires support from the project RAPs.

Proposed management of the potential Aboriginal archaeological resources at the site

- The project RAPs will be informed of the current planning status of the 2A Gregory Place site and will be provided with a copy of this updated assessment report.
- The findings and recommendations of future contamination assessment and building demolition planning for the 2A Gregory Place site be provided to the project RAPs.
- An archaeological research design and test excavation methodology for the 2A Gregory Place site will be developed in consultation with the projects RAPs that is based on the results of contamination assessment and consideration of demolition planning.

Report contents

1.0 INTRODUCTION 9

1.1 BACKGROUND..... 9

1.2 DEVELOPMENT CONCEPT 9

1.3 OBJECTIVES OF THIS REPORT 12

1.4 STATUTORY HERITAGE CONTEXT AND CONTROLS 12

1.5 ABORIGINAL COMMUNITY ENGAGEMENT AND CONSULTATION 13

1.6 HERITAGE ASSESSMENT AND REPORTING METHODOLOGY 13

1.7 REPORT CONTRIBUTORS 14

2.0 UNDERSTANDING THE COUNTRY 15

2.1 AN ANCIENT RIVER LANDSCAPE AT HARRIS PARK 15

2.2 PARRAMATTA SAND BODY 15

2.3 SEA-LEVEL RISE AND CHANGES TO COUNTRY..... 15

2.4 CHANGES TO COUNTRY AND SHIFTING ECOLOGICAL ZONES AND RESOURCES 16

2.5 EVIDENCE FOR FORMER RIVER AND CREEK ALIGNMENTS 17

 2.5.1 *Parramatta River* 17

 2.5.2 *An old alignment of Clay Cliff Creek*..... 17

2.6 RECONSTRUCTING THE CLAY CLIFF CREEK LANDSCAPE 18

 2.6.1 *Preamble – a persistent misunderstanding of watercourses on the Cumberland Plain* 18

 2.6.2 *What type of watercourse is Clay Cliff Creek?* 18

 2.6.3 *chain of ponds drainage* 19

 2.6.4 *Ponds and waterholes on Clay Cliff Creek*..... 20

 2.6.5 *Clay Cliff Creek as part of a managed Aboriginal landscape* 21

3.0 ABORIGINAL ARCHAEOLOGICAL HERITAGE CONTEXT 22

3.1 PREVIOUS ARCHAEOLOGICAL INVESTIGATIONS IN PARRAMATTA 22

3.2 INTERPRETING THE PSB ARCHAEOLOGICAL RECORD 23

3.3 LOCAL ARCHAEOLOGICAL HERITAGE CONTEXT (AHIMS) 24

3.4 ARCHAEOLOGICAL INVESTIGATIONS ON CLAY CLIFF CREEK 24

 3.4.1 *Robin Thomas Reserve and Harris Street* 24

 3.4.2 *Parramatta skate park*..... 25

 3.4.3 *21 Hassall Street* 26

3.5 ARCHAEOLOGICAL EXPECTATIONS FOR THE 2A GREORY PLACE SITE..... 26

4.0	ABORIGINAL HISTORICAL CONTEXT	28
4.1	BRITISH DISCOVERY OF ABORIGINAL PARRAMATTA	28
4.2	THE COUNTRY AT PARRAMATTA IN 1788	32
4.3	BRITISH SETTLEMENT AT ROSEHILL	34
4.5	JAMES RUSE AND EXPERIMENT FARM	34
4.6	ELIZABETH FARM AND ABORIGINAL CONNECTIONS	36
4.7	ABORIGINAL RESISTANCE ON CLAY CLIFF CREEK	37
4.8	AGRICULTURAL DEVELOPMENT OF THE LAND	37
4.9	ABORIGINAL PEOPLE IN PARRAMATTA DURING THE MACQUARIE PERIOD	37
4.10	ABORIGINAL PEOPLE IN PARRAMATTA IN THE 1820S	38
4.11	HAMBLEDON COTTAGE AND ‘NEALE’S COTTAGE’	38
4.12	EARLY TWENTIETH CENTURY CHANGE TO CLAY CLIFF CREEK.....	39
5.0	EXISTING CONDITIONS.....	41
5.1	BUILDINGS	41
5.2	CONTAMINATION	45
5.3	GEOTECHNICAL INFORMATION	47
5.3.1	<i>Sampling</i>	47
5.3.2	<i>Bore-log data</i>	48
5.3.3	<i>Subsurface profiles</i>	48
5.3.4	<i>Summary of the subsurface profiles at the site</i>	49
6.0	OUR UNDERSTANDINGS IN SUMMARY	50
6.1	CLAY CLIFF CREEK.....	50
6.2	ARCHAEOLOGICAL EXPECTATIONS	51
6.2.1	<i>Aboriginal land use</i>	51
6.2.2	<i>Modern land use impacts on potential archaeological resources</i>	51
7.0	SIGNIFICANCE ASSESSMENT	52
7.1	HERITAGE ASSESSMENT CRITERIA	52
7.2	ASSESSING ABORIGINAL ARCHAEOLOGICAL HERITAGE SIGNIFICANCE.....	53
7.3	ASSESSMENT OF SIGNIFICANCE AGAINST CRITERIA.....	54
7.4	EVALUATION.....	55

8.0	ARCHAEOLOGICAL IMPACT ASSESSMENT	56
8.1	SUBSURFACE IMPACT OF THE DEVELOPMENT	56
8.2	ABORIGINAL ARCHAEOLOGICAL MANAGEMENT CONSTRAINTS	56
8.3	NEXT STEPS IN THE ABORIGINAL HERITAGE MANAGEMENT FOR THE SITE	56
9.0	MANAGEMENT RECOMMENDATIONS	57
9.1	RECOMMENDATIONS.....	57
10.0	REFERENCES	58

Attachments

Attachment A

Planning Secretary’s Environmental Assessment Requirements (SSD-31179510)

Attachment B

Aboriginal community engagement and consultation

Attachment C

statutory heritage context and controls

Attachment D

AHIMS data

1.0 Introduction

1.1 Background

This Aboriginal Cultural Heritage Assessment Amendment Report has been prepared in consultation with Aboriginal community groups to identify and understand the Aboriginal cultural heritage values of the land to inform the proposed redevelopment of the 2A Gregory Place site in Harris Park as a build to rent and affordable housing State Significant Development.

Figure 1.1: The 2A Gregory Place site at Harris Park comprises Lot 2 in DP 807801 and is irregular rectangular in shape and is about 19,480 sqm in size. It is occupied by a former light industrial buildings that range from two to eight storeys (equivalent) in height



This report has been developed to address the Planning Secretary Environmental Assessment Requirements (SSD-31179510) that have been issued for the proposal and has been updated in response to changes to the scheme and comments that have been raised through public comments and the state design review panel and as a result of stakeholder engagement.

1.2 Development concept

The proposal is illustrated by the basement plan and cross sections elevation drawings below.

Figure 1.2: Basement (Tzannes 2025)



Figure 1.3: Cross sections (Tzannes 2025)

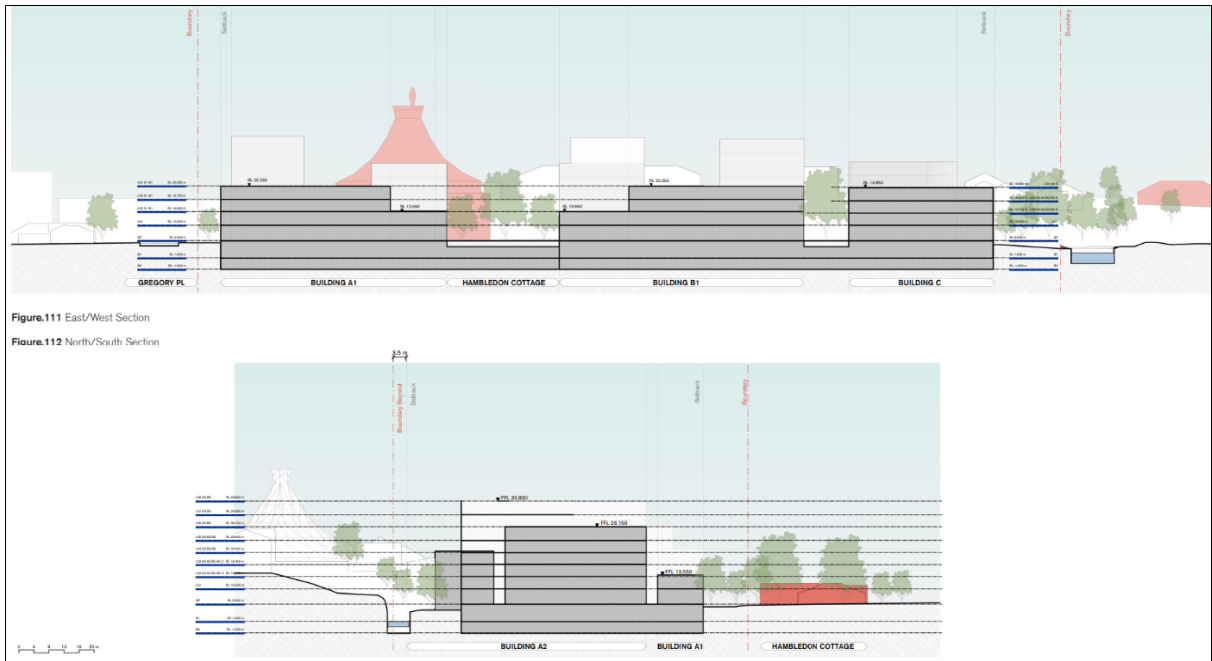


Figure 1.4: Elevations (Tzannes 2025)

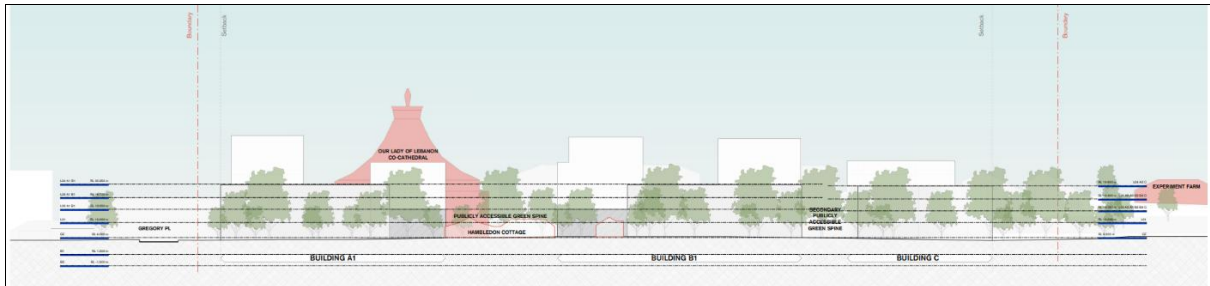


Figure.113 North Elevation - Landscaped Shared Zone

Figure.114 South Elevation - Channel Walk

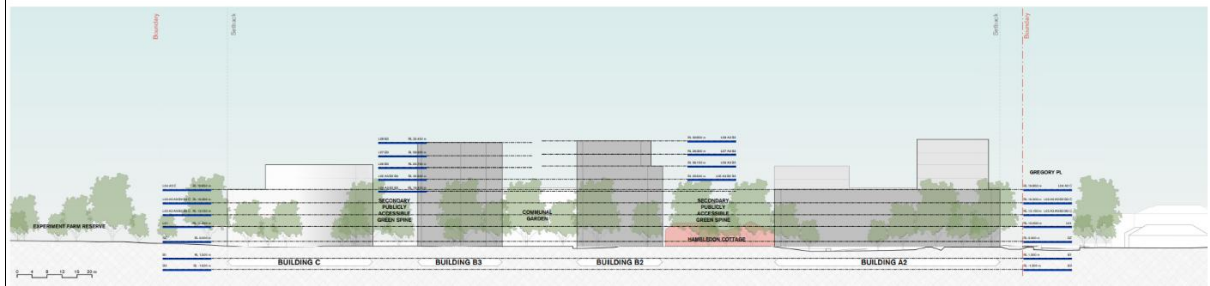


Figure 1.5: Elevations (Tzannes 2025)

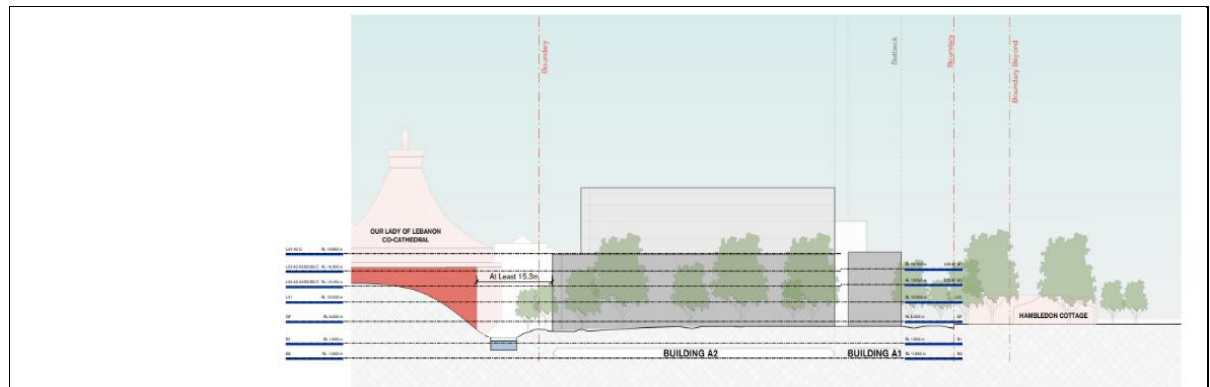
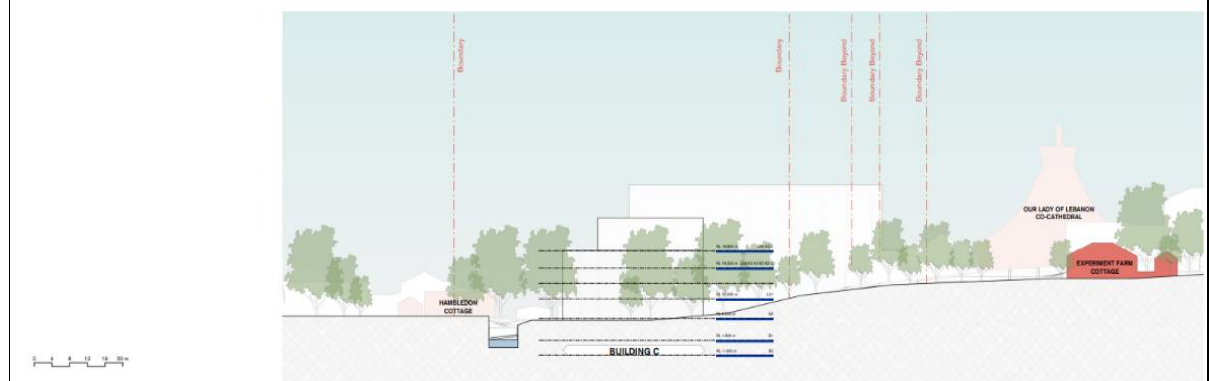


Figure.115 East Elevation - Gregory Place

Figure.116 West Elevation - Experiment Farm



1.3 Objectives of this report

The 2A Gregory Place site is located on the southern edge of the State Heritage Register listed Parramatta Sand Body (PSB) which contains a significant Aboriginal and early colonial archaeological record and is recognised for its combined archaeological, historical and environmental heritage values.

The site is also situated on Clay Cliff Creek which has archaeological evidence of Aboriginal visitation and use dating from the end of the Pleistocene, during the Holocene, and continuing after 1788 as part of Parramatta's complex and culturally significant post-Invasion history and heritage that continues to be important to contemporary First Nations people.

We have sought to understand the Aboriginal heritage values of the Country at Clay Cliff Creek to evaluate the potential for future development of the land to result in harm occurring to Aboriginal objects¹ and to develop measures to avoid and mitigate potential archaeological heritage impacts.

The Aboriginal community consultation that has been completed for this report has been undertaken within a wider cultural context established by the Connecting with Country framework and our landscape and archaeological understandings in particular has been used to inform the project and help embed first Nations principles within the design of the development.

1.4 Statutory heritage context and controls

The Commonwealth, State, and local statutory heritage contexts within which this report has been prepared, and details of the relevant legislation, are appended (Attachment C). Legislation that provides protection for Aboriginal heritage in NSW are the National Parks and Wildlife Act 1974 (as amended) and the National Parks and Wildlife Regulation 2019. The NPW Act protects Aboriginal objects and Places, and the Regulation provides a framework for undertaking activities and exercising due diligence.²

Approved State Significant Developments are exempt from the provisions of the NPW Act. However, issued SEARs for SSD's still require detailed Aboriginal cultural heritage impact assessment and development of appropriate impact avoidance, mitigation, and management measures for proposed development site's with potential Aboriginal archaeological sensitivity.

¹ Aboriginal objects as they are defined by and protected by the *National Parks and Wildlife Act 1974* (NPW Act).

² There are no registered Native Title claims, or Indigenous Land Use Agreements that apply to the site or lands in the immediate vicinity and there are no previously recorded Aboriginal sites (AHIMS) on the land.

1.5 Aboriginal community engagement and consultation

We have developed this report by listening to and talking with about twenty Aboriginal community groups. Key findings of this consultation are tabled below. Full details of the Aboriginal engagement and consultation that have has been undertaken for this report are appended (Attachment B)

Figure 1.6: 2A Gregory Place on-site Aboriginal community consultation meeting



Table 1.1: what we learnt through consultation – key messages

<i>What we talked about</i>	<i>What people told us</i>
Design opportunities	Develop a framework for inclusion of public art in design, landscape with planting to connect back with Country, and embed and tell cultural history and heritage stories within development
Caring for Country	When buildings are constructed, opportunities for ongoing care and maintenance of development by Aboriginal people be explored to facilitate access and care to Country
Cultural heritage & archaeology	There is potential for the proposal to impact on Aboriginal objects and should be test excavated The Aboriginal history and heritage of the land should be acknowledged and respected. There should be opportunities in the new development to tell Aboriginal stories pertinent to the local area, and opportunities for the use of Aboriginal art in storytelling

1.6 heritage assessment and reporting methodology

This report has been prepared according to the following assessment and reporting standards and guidelines:

- Australia ICOMOS. [2013]. The Burra Charter. The Australia ICOMOS Charter for Places of Cultural Significance. Australia ICOMOS Inc.
- NSW Department of Environment, Climate Change & Water. (DECCW) 2010). Aboriginal Cultural Heritage Consultation Requirements for Proponents. Part 6 National Parks and Wildlife Act 1974. DECCW. Sydney.

1.7 Report contributors

Dominic Steele has written this report with the assistance of the project Registered Aboriginal Parties who have helped us understand the cultural heritage values of the place. The landscape and soil maps used here have been prepared by Eric Claxton and Adrian Dreyer has provided site photographs.

2.0 Understanding the Country

2.1 An ancient river landscape at Harris Park

The City of Parramatta is built on an ancient river floodplain of the Parramatta River that is contained within a river valley whose sides and basement are formed on Ashfield Shale over Hawkesbury Sandstone bedrock. Below modern ground levels at Harris Park are Quaternary-period fluvial sediments that infill the lower part of the valley and form the river floodplain. The ages and precise origins of the sediments that infill the valley are linked to past global glacial and inter-glacial cycles, and rises and falls of sea-levels, that resulted from expansion and melt of global ice.³ Surficial Quaternary deposits are inferred to date from the last c.120 000 years and to relate to fluctuating sea-levels during the Late Pleistocene and mid-Holocene to present.⁴

2.2 Parramatta Sand Body

The Parramatta Sand Body (PSB) forms part of the Quaternary-period alluvial sediment sequence (Qpat) that is referred to above.⁵ The PSB is mapped on the SHR to be defined to a more limited extent than the Quaternary mapping of Qpat deposits. The PSB contains a significant Aboriginal archaeological record with some cultural materials dated to around 40,000 Before Present (BP).

2.3 Sea-level rise and changes to Country

There is considerable archaeological evidence from previous investigations of the PSB that show how Aboriginal people were visiting Parramatta during the Last Glacial Maximum (LGM) and how from that time the landscape of Parramatta changed. Some changes to Country were dramatic and included major land transformations resulting from long-term climate change processes and sea-level rises and drops. Around 20,000 years ago, the sea-levels were about 130m lower than present. The offshore coastal shelf was above sea-level and the coastline was located some 8-15km further east than it is today. Parramatta at this time was situated within an inland valley drained by a freshwater stream that ran down through the valley to the east and crossed the future Sydney Harbour and continued out through the rocky headlands before snaking across the now submerged coastal shelf to reach the LGM shoreline.

As global climate conditions changed from the LGM, rising sea-levels that resulted from the melting ice sheets flooded across the terrain of the continental shelf and eventually the sea reached and inundated Port Jackson and the rising water-level progressively moved up and 'drowned' the Proto-Parramatta River valley.

³ The Quaternary (most recent period of the geologic timescale) is subdivided into the Pleistocene (2.5 million years ago to 11,700 years ago) and Holocene (11,700 years ago to present).

⁴ Troedson et al 2015.

⁵ Quaternary mapping published in 2015 shows the PSB forms part of the much larger Quaternary geological formation mapped as Qpat on the updated mapping (Troedson et al 2015).

Sea-levels reached their present elevations around 7,000 years ago but this was not before sea-levels had first exceeded modern levels by between +1-2m. The higher than modern sea-levels also appear to have remained in place for an extended period of time before they oscillated, with often rapid ‘meltwater pulses’, and fell back to present positions about c.2,000 BP. During the intervening 5,000 years there were shorter oscillations that created higher sea levels than experienced today and two are recorded during two intervals beginning around 4,800 BP and 3,000 BP respectively.⁶

Post-glacial sea-level rise will have had a powerful impact on the lives of Aboriginal people living in both coastal areas and within hinterland-inland valleys within reach of the rising water. Researchers speculate that generation after generation of Aboriginal people around the Australian continent are likely to have had to continuously re-negotiate and realign land tenure and share arrangements with neighbours and ultimately make stay and go decisions about ‘*lowland clan estates*’.⁷

2.4 Changes to Country and shifting ecological zones and resources

The precise nature and rate of post-glacial sea-level rise, and when and how quickly the post-glacial rising water progressed upstream from Sydney Harbour to Parramatta is not well understood. It is probable that one ongoing effect that rising (and dropping) sea-levels is likely to have had on the lives of Aboriginal communities living in the valley was the constant shifting of the relative landscape positions of freshwater, estuarine and saltwater ecological zones because these determined the location and availability and distribution of resources people used at various times in the past.

As a result of rising sea-level, Parramatta’s freshwater river valley environments progressively gave way over time to estuarine environments featuring a complexity of sub-tidal, intertidal and supratidal environments with ecosystems ranging from saltwater-freshwater wetlands to savanna grasslands and woodlands. The changes in the landscape position of these environmental zones and development time for new ecological zones to transition from or to replace those effected by rising sea-levels with comparable carrying capacity suggests the position and nature of Aboriginal land use will have continuously changed as environmental conditions changed in the lead up to and following stabilisation of current sea-levels about 2,000 years ago.

⁶ Lewis et al 2012.

⁷ Researchers Nunn and Reid 2016:41.

2.5 Evidence for former river and creek alignments

2.5.1 Parramatta River

The current alignment of Parramatta River is at least 64,000 years old based on dating of PSB sediments and there are two older palaeo-channels of the river identified in the CBD where sandstone bedrock beneath alluvial sediments has been gouged out to a depth below current sea-levels that reflect older alignments of the river.

2.5.2 An old alignment of Clay Cliff Creek

The nature of what Clay Cliff Creek was likely to have comprised in 1788 is reconstructed in follow sections below from multiple lines of evidence. The information that we have drawn upon to reconstruct what the conditions of the place were like before they were changed by colonial occupation and land use indicates Clay Cliff Creek was a chain of ponds watercourse rather than a free-flowing stream with defined banks and creek bed and today the true nature and form of the original landscape and drainage at Gregory Place is not reflected by or recognisable and as a result of its conversion into a concrete channel.

Newspaper articles from 1908 mention ‘interesting finds’ made during works towards where Clay Cliff Creek joins Parramatta River that may describe an older alignment of Clay Cliff Creek within a lower landscape position:

Further interesting discoveries continue to be made by the workmen employed on the Parramatta sewerage works. The other day an interesting memento of barbaric times was unearthed in the shape of a black-fellow's stone tomahawk, which is now in the possession of Mr. E. J. Love. At a depth of 15ft. evidence were found of an old water-worn channel, with stones and pebbles evidently rounded by the action of water. There was also found red soil of a character only found in the neighbourhood at Redbank and near the Industrial School, and which must, at some remote period, have been brought down by water. It is remarkable that similar indications were discovered in connection with the construction of the bridge across the river for the Carlingford line, at a depth of 45 feet, and also 15ft. down in the excavations which are being made at the 'Black Bridge.'

The signs point to the existence of a channel ages ago along the present course of Clay Cliff Creek, or nearly so, which has gradually been buried by accumulating deposits brought down by the water.⁸

A second article reported on excavations to replace the old wooden ‘Black Bridge’ had extended down a considerable depth at the southern side of Parkes Street and digging also revealed ‘*the existence of old swampy ground and the ancient water channel mentioned elsewhere*’.

⁸ Cumberland Argus, 2 May 1908, p.4.

2.6 Reconstructing the Clay Cliff Creek landscape

2.6.1 Preamble – a persistent misunderstanding of watercourses on the Cumberland Plain

Archaeologists use understanding of Country to help predict where Aboriginal people may have used a landscape in the past and where archaeological evidence of this may be located in the present. Water is thought to be an important consideration influencing where people camped; large and/or permanent water supplies may have supported large numbers of people and/or prolonged periods of occupation while smaller and/or ephemeral water supplies may have been able to support only small numbers of people and/or transient occupation.⁹

A stream order and tributary hierarchy (Strahler 1957) derived from the northern hemisphere is commonly used by Sydney archaeologists to predict where archaeological sites may occur on the Cumberland Plain. This method identifies the smallest tributary stream as 1st order, two 1st order streams to join to form a 2nd order streams, two 2nd order streams join to form a 3rd order stream, two 3rd order streams join to form a 4th order stream and so on. In this schema a first order stream is the smallest tributary that feeds larger streams, but it does not normally have consistent water flow. First and second order streams generally form on steep slopes and first order streams are intermittent.

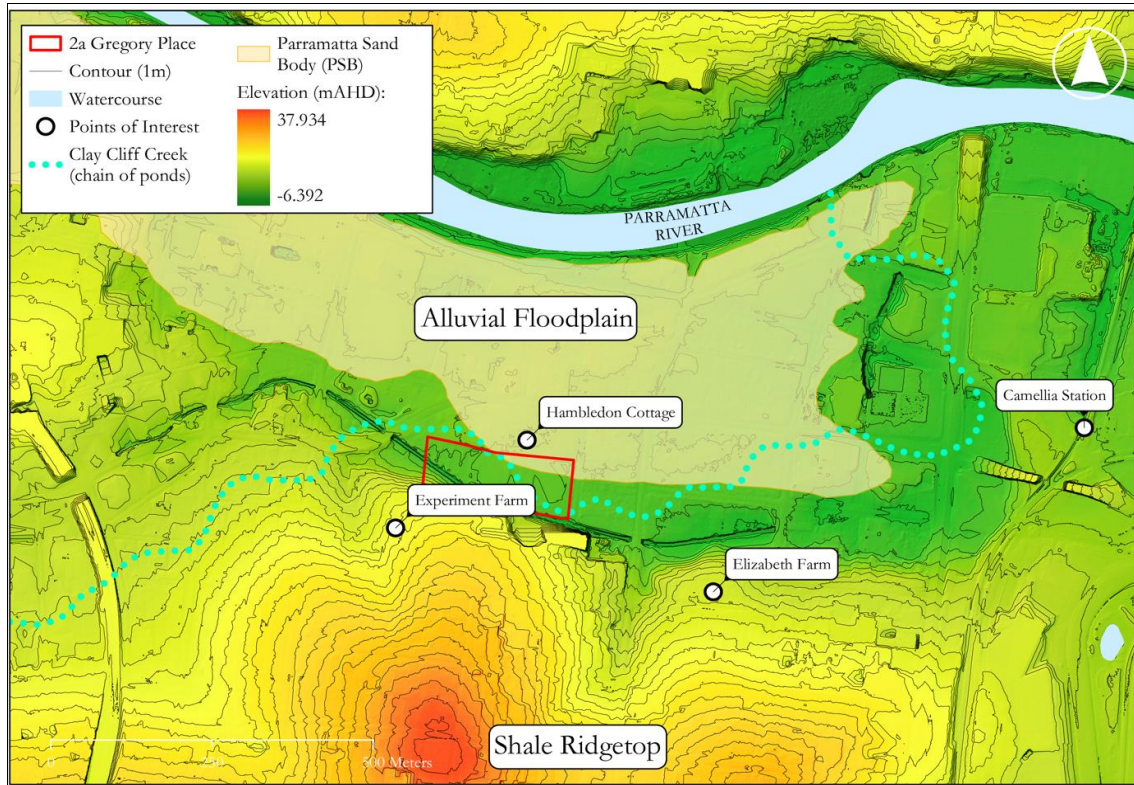
A problem with this approach is that watercourses on the Cumberland Plain were not permanent and free flowing streams with incised channels that were arranged in a hierarchy of tributaries. Watercourses before colonisation were chains of ponds and wetlands that were destroyed by colonial settler land clearing and stock grazing and the drainage patterns were transformed into the linear incised creek line forms that we see today.

2.6.2 What type of watercourse is Clay Cliff Creek?

Clay Cliff Creek is a fresh watercourse that originates in Merrylands and travelling from the west drains elevated shale landforms before crossing to the east across the lower alluvial floodplain of the Parramatta River to empty. We reconstruct the original form of Clay Cliff Creek in 1788 (in the stretch broadly extending from the west of Elizabeth Farm to around Harris Street) was likely to have been discontinuous chains of ponds in low lying terrain along drainage flow alignments rather than the watercourse occurring as a linear and incised creek form with banks and bed and free flowing water.

⁹ White & McDonald (2010:32-34)

Figure 2.1: Familiar historic heritage items and recorded historic Aboriginal site location within a reconstructed landscape at Harris Park comprising chain of ponds and swampy meadows. Colonial agricultural activities at Harris Park in the form of vegetation clearing and grazing led to the loss of wetlands and entrenchment of drainage flows into continuous channels



2.6.3 chain of ponds drainage

The landscape at Harris Park are likely before colonisation to have had drainage patterns in the form of irregularly spaced and ponds separated by preferential flow paths and generally only saw continuously running water during high rainfall events. These landforms are known as swampy meadows formations and represent in-channel forms vegetated with grasses and interspersed with irregularly spaced disconnected ponds.¹⁰ Land clearance and grazing led to the loss of swamps and wetlands, native grasses and trees, and entrenchment of drainage flows into continuous channels.

The former presence of this drainage form across the Cumberland Plain to the west of Parramatta is reflected in the names of a number of western Sydney watercourses such as First Ponds Creek, Second Ponds Creek, Gidley Chain of Ponds, and Killarney Chain of Ponds.

¹⁰ Eyles 1977, Mactaggart et al 2007:Figure 2.19.

Figure 2.2: An example of a swampy meadow (Cookanulla Creek) with disconnected pools, or a chain of ponds¹¹

It was not until the late 1960s that geomorphologists began to recognise that the prevalence of deeply incised creek lines in Australia was the product of settler activity (see review in Bird 1982). Crucial to this discovery was the use of historical sources that documented the observations of early European explorers and settlers and recorded the form of waterways and ponds on early maps. Before settler colonisation, watercourses were discontinuous chains of ponds and wetlands that relied on heavy rain to overflow the ponds and join them into a stream. The ponds drought-proofed the land by keeping water available for plants, animals and people. Settler activity disrupted this by draining the wetlands, clearing vegetation, grazing sheep and cattle and introducing rabbits. These activities caused rain to bite into the watercourses, converting the chains of ponds into continuous streams in incised channels up to 15 metres deep, with water draining quickly away.¹²

2.6.4 Ponds and waterholes on Clay Cliff Creek

It is likely that the landscape between Clay Cliff Creek and the Parramatta River had uneven and low-lying surface topography that featured chain of ponds drainage and swampy meadows formation vegetation and ecologies. Walter Campbell recalled in the 1850s the land at 'Harris' paddock' (around Experiment Farm) was largely cleared of timber but on the 'summit of the hill' there was an open forest of mahogany trees 'which probably were in much the same condition as they were when Parramatta was first discovered'. Campbell also described that meandering through the paddock was Clay Cliff Creek that was 'generally a series of waterholes'.¹³

Insights into the survival of indigenous vegetation in this established agricultural landscape are provided by a first-hand overview of the flora of the district in 1857.¹⁴ Black-butt and Bloodwood and Turpentine trees were abundant near creeks north of Parramatta and Woolly-butt tree (*E. gomphocephala*) grew abundantly on the south side of Parramatta. In one part of 'General Macarthur's bush' the latter tree type was found to be more plentiful than any other species. In the lower parts of the estate, towards Duck River, 'water gum' (*Tristania nereifolia*) grew in abundance. Near Red Bank there were some small turpentines, but the locality did not seem favourable for them (but purple coloured *Mirbelia* grew plentifully). Also noted was one grass (*Anisopogon avenaceus*) that grew at North Rocks but was not common elsewhere and owing to the introduction of foreign grasses was rapidly disappearing.¹⁵

¹¹ Mactaggart et al 2007.

¹² Lawrence and Davies 2018:240-241.

¹³ Cumberland Argus, 8 December 1920:4.

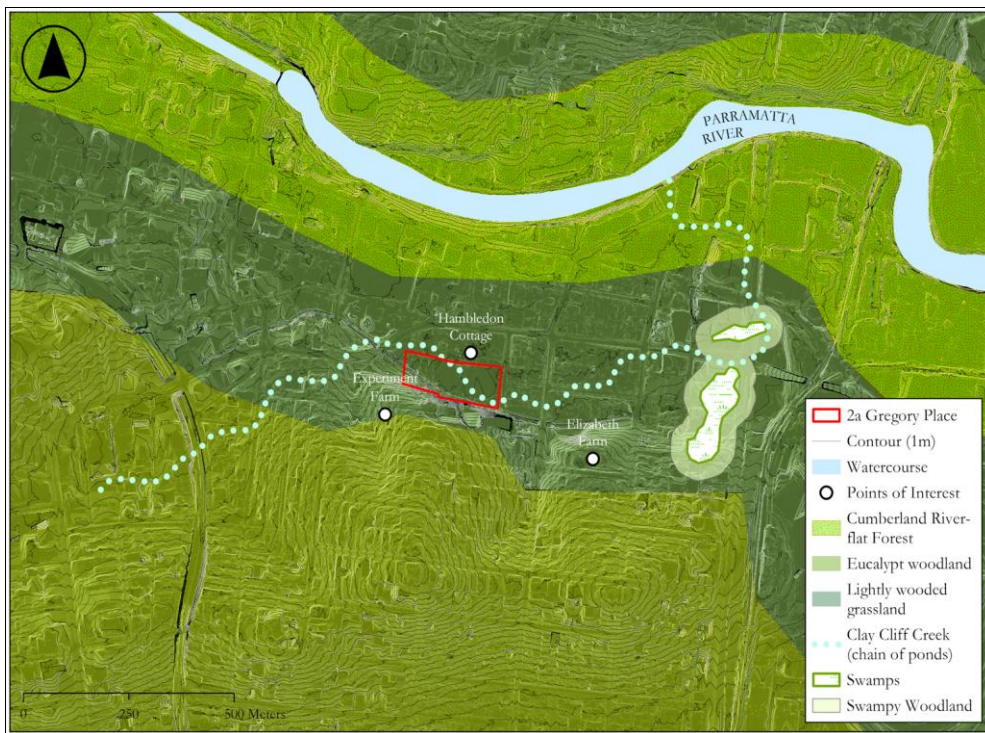
¹⁴ Sydney Morning Herald 1857, 24 December 1857:8.

¹⁵ Sydney Morning Herald 1857, 24 December 1857:8.

2.6.5 Clay Cliff Creek as part of a managed Aboriginal landscape

The appearance of this Country was consistently described by the first British people to see it as resembling a (vast) ‘park’. The open and lightly wooded grassland is believed to have been cared for, shaped and maintained by Aboriginal people over an extended period of time using fire management. Aboriginal people are likely to have burnt the open grassy understorey frequently with low intensity fires to keep it clear and stimulate new growth and create conditions favourable for grazing animals. Fires would be managed by geographical features such as watercourses and previously burnt and pathways resulting in a mosaic of resource locales.

Figure 2.3: Reconstructed landscape features at Harris Park with chain of ponds drainage - rather than an incised and linear creek form – being a central river landscape element of the Parramatta River floodplain in this location



3.0 Aboriginal archaeological heritage context

3.1 Previous archaeological investigations in Parramatta

The Aboriginal archaeological record of Paramatta is based on accumulated knowledge that has been gained from a considerable number of Aboriginal (and historical) archaeological test and salvage investigations along the southern bank of the Parramatta River between Parramatta Park and Robin Thomas Reserve. Many of the investigations have been located on the 'Parramatta Sand Body' (PSB) described as an 'Ancient Aboriginal and Early Colonial Landscape' and listed on the NSW State Heritage Register (SHR Item 01863). The curtilage of this Item (George Street, Hassall Street and Harris Street) contains a section of the Parramatta Sand Body (PSB) and the location was also the site of a military barracks established about 1790. The Statement of Significance for this item includes reference to the PSB:

Archaeological investigation of the sand body has uncovered a substantial archaeological record that has contributed to our understanding of pre-colonial Aboriginal occupation of the Parramatta area and more broadly, the Cumberland Plain. The antiquity of some of this archaeological record and evidence of change over time is significant to Australian archaeology generally. For the local Aboriginal people whose ancestors lived on and used the sand body for many thousands of years before the arrival of non-Aboriginal people, the sand body has special significance. The sand body is a tangible link with their cultural past.

Amongst the first archaeological investigations of the PSB undertaken in the City during the early to mid-2000s was at 109-113 George Street (JMCHM Pty Ltd). Testing (2003) followed by salvage excavation (2005) at RTA-G1 revealed evidence for multiple phases of prehistoric Aboriginal occupation from the Late Pleistocene (c.30,000 BP) to about 3,500 BP with the most recent occupation evidence (last 2-3,000 years) lost from historic land use impacts. The investigations recovered 4,775 artefacts. Most of the assemblage (82%) was knapping debitage and most artefacts (75%) were found in the upper 40cm of deposit. Lower density material (16%) occurred between 40cm and 60cm in depth, while 8% was between 60cm and 80cm depth. Very few stone items were below 80 cm depth. Glossy heat-altered silcrete was concentrated in the top 10cm-20cm of deposit and associated with small, backed artefacts. Silicified tuff in the earlier assemblages at the site was technologically distinct from more recent silcrete Bondaian assemblages. .

Formal artefact types included backed artefacts, three (ground stone) hatchet heads in a discrete cluster, anvils, two serrate retouched tools, an ironstone core, and clusters of manuport stones (possible heat retainers). This evidence demonstrated a range of activities were carried out and represented domestic occupation debris accumulated over a long time period. Radiocarbon dates revealed occupation extended from the late Pleistocene through to the mid-Holocene.

Excavation at CG1 (corner of Charles and George Streets) involved investigation of about 210 sqm of hand excavated deposit and another 250 sqm mechanically screened. Over 6,500 Aboriginal objects were recovered with a density of 24 artefacts per sqm.¹⁶ Excavation revealed living floors containing artefacts and hearth arrangements and assemblage was dominated by silicified tuff and silcrete.

Since about 2005 there have been about forty archaeological investigations on the alluvial terrace but with few exceptions the findings of RTA-G1 and CG1 have not been replicated. Between 2005 and 2019, two additional excavations recovered significant terminal Pleistocene archaeology (21 Hassall Street & O’Connell Street Public School).¹⁷

3.2 Interpreting the PSB archaeological record

The PSB deposits initially formed around 50,000 years ago but with extensive portions reworked between 20,000 and 5,000 years ago. Below are some details and metrics of the alluvial terraces:¹⁸

The sand body is some - 69 ha in size, extending ~2.5km along the river, up to 300m away from the water’s edge, and commonly - ~4-7m above the river surface. On reviewing the current development of the region, we find that nearly 1.9 ha (~29%) of the deposit has been destroyed through urbanisation, including many of the sites reviewed here....

While there is variation across the deposit, the terrace is dominated by medium to coarse sand (250-1000µm) in close proximity to the Parramatta River, indicative of a fluvial deposition from a moderate river flow and increasing fine clays and silts (0.5-55µm) more suggestive of aeolian processes further away from the river. These later deposits probably reflecting reworking of the initial alluvium, and accounting for the substantive distance from the river.

The terrace has been shown to extend to >3m in depth before reaching underlying geological substrate, which consists of Wiannamatta shales (Gale 2020). More commonly, excavations, find the alluvium to be ~1-1.3m thick, before reaching an indurated heavy clay unit, which is visibly comparable with Cenozoic units found elsewhere on the Cumberland Plain (e.g. Londonderry Clay (Gale 2020). Visually, the unit has variable colours but is typically a yellowish to reddish brown homogenous unit, with the upper portion (~40cm) darker and intermixed by later colonial activities; and the lower portion often mixing with the underlying heavy clay strata.

Only a few excavated sites report substantive material culture and only three have contained substantial evidence for deep time occupation; CG1 (AHIMS #45-6-2648), RTA-G1 (AHIMS #45-6-2673) and Hassall Street (AHIMS #45-6-3180) each with several thousand artefacts and average densities of ~32-52m².

¹⁶ JMCHM Pty Ltd 2005a:26.

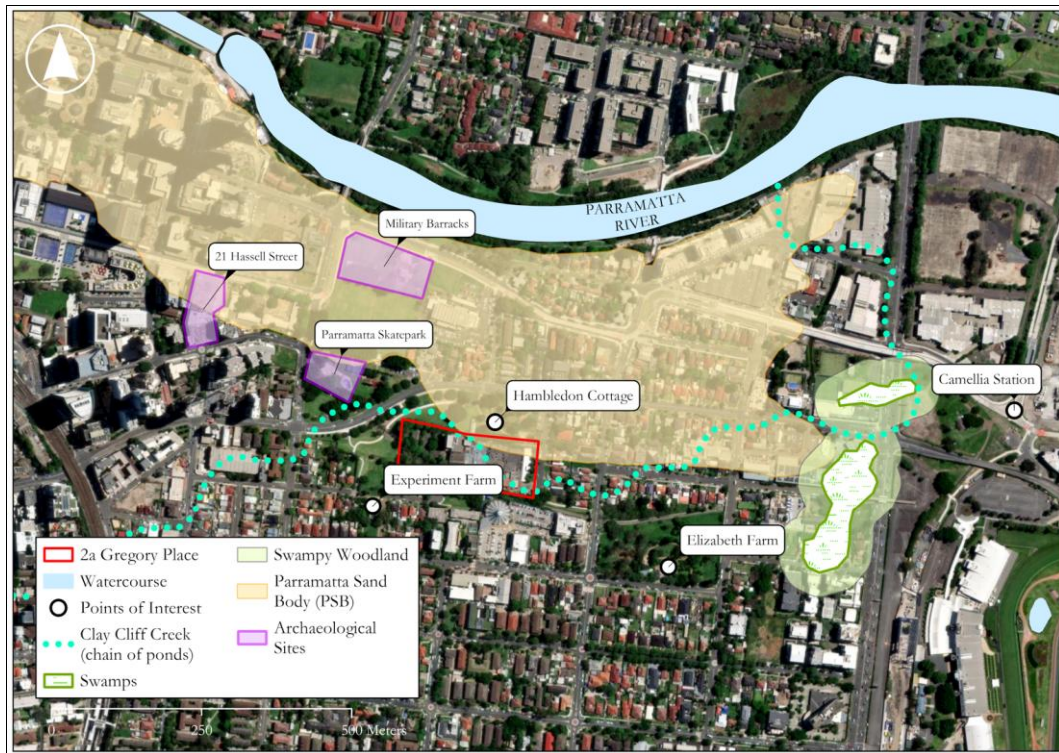
¹⁷ Williams et al 2021:3.

¹⁸ Ibid:3-4.

3.3 Local archaeological heritage context (AHIMS)

There are a number of previously recorded AHIMS sites nearby to 2A Gregory Place. Some of these have been investigated through archaeological excavation. The results of AHIMS searches and review of the findings at these sites are discussed below.

Figure 3.1: Nearest known AHIMS recording to the 2A Gregory Place site (200m AHIMS search)



3.4 Archaeological investigations on Clay Cliff Creek

3.4.1 Robin Thomas Reserve and Harris Street

This site (AHIMS #45-6-3157/#45-6-3158 - Harris Street footpath/Robin Thomas Reserve) was registered on AHIMS as an Aboriginal Resource and Gathering site located on the crest of a low flat PSB terrace. The site listing notes the location would have been an attractive location for Aboriginal people because it had access to two permanent water sources (Parramatta River and Clay Cliff Creek) and their forest, riverine and estuarine food and raw material resources. Test excavations (nine 1m x 1m test squares) in 2013 for services in the footpath of Harris Street and recovered fifty-nine artefacts (mainly of silcrete, chert, quartz, and quartzite) including several pieces of worked glass.¹⁹

¹⁹ Comber Consultants 2014:37.

The site was test excavated in 2017 to investigate the impact of the Parramatta Light Rail construction along the western edge of Robin Thomas Reserve. The testing comprised four test squares (TS7-TS10) aligned along the western edge of the grassed reserve and this revealed intact subsurface deposit in three of the four squares below a variably thick layer of disturbance. Squares TS7, TS9 and TS10 contained deep sand deposits associated with the PSB that extended to a depth of at least 1m. At TS7, this was shallow with compact orange-brown sands encountered between 18-20cm depth. At TS9, red/orange-brown sands were encountered at 35-37cm depth. At TS10 sands were present from 26cm and undisturbed apart from a single brick fragment. A total of nine artefacts were recovered and the majority (n=8) came from TS10 and were recovered from spit 6 (50-60cm depth, n=5) and spit 7 (60-70cm depth, n=3). One further artefact was found at TS7 in spit 5 (40-50cm depth), and all artefacts were from the intact natural sand deposits.²⁰

3.4.2 Parramatta skate park

Archaeological testing at James Ruse Reserve in 2004 to inform plans to enlarge the skate facilities found the influence of the Parramatta River was minor in the formation of the very fine-grained alluvial soils recorded.²¹ The site lies at a slightly lower elevation than the sand levee of the PSB and is likely to have been subject to low-velocity flood that deposited fine grained sediment from the shale hills. Stratigraphy comprised 20cm modified/introduced loam topsoil over brown clayey silt (20-50cm) gradually transitioning into light brown clay with iron manganese staining that developed with depth (to about 850mm). Plastic silty clay was identified below this to a depth of 1.2m.

The investigations reported the soil profiles were not the same as the PSB soils on the higher ground closer to the river. A low-density of Aboriginal artefacts was found (thirteen) and none were in situ. No artefacts were found lower than 0.85m below ground which marked the interface with the impermeable plastic clays. It was evaluated that the low-density distribution of artefacts within disturbed soils was unremarkable in size and nature and comprised mainly items of silcrete 'waste flake' with little research value.

It was proposed the area may have been a swamp oak environment and not a highly favourable campsite for occupation for prolonged periods that would have created substantial archaeological signatures. It was concluded (AHMS Pty Ltd:44) that unlike the PSB archaeological contexts on higher ground closer to the river that attracted repeated Aboriginal visitation and use in the past, the Skate Park was located on an alluvial flood plain of a creek and back of the river with low archaeological research potential.²²

²⁰ Kelleher Nightingale Consulting 2017:47.

²¹ AHMS Pty Ltd 2004.

²² Ibid:29.

3.4.3 21 Hassall Street

Archaeological test and salvation excavation at 21 Hassall Street investigated a levee bank of Clay Cliff Creek (~80cm deep portion of the terrace between 7.7m-8.5m AHD) that has yet to be shown as connected with the broader alluvial terrace of the PSB but which has OSL dates that tell us about the formation of the deposit about 15,000 years ago and terminating around 4,000 years ago.²³ About 30 sqm of deposit was excavated and about 1,730 Aboriginal objects (stone artefacts) were recovered that relate to two major phases of past use (occupation periods). The early occupation was dominated by the use of indurated mudstone/chert/tuff raw materials (IMCT) ranging from 13,000-6,000 BP (centred on 7,000 BP) overprinted by a late Holocene visitation characterised by silcrete artefacts centred on 5,000-2,000 BP.

The lower stone assemblage comprised expedient flakes core tools commonly found in early Holocene and terminal Pleistocene sites. The IMTC raw material types strongly suggest movement between people at the site at Clay Cliff Creek and the Hawkesbury-Nepean River which is the nearest documented source of such materials in the region. The latter river system has been shown as a foci of Aboriginal population during the terminal Pleistocene and aligns with broader picture of past movements across the Sydney Basin.

The site in summary revealed two major phases of past Aboriginal use. The first phase was initial and repeat visitation in the terminal Pleistocene and early Holocene that was characterised by IMCT dominated assemblages and relatively expedient technologies. This was followed by more intense use/occupation of the river corridor in the mid to late Holocene and characterised by silcrete dominated assemblages and a wide variety of tool types and increasingly complex technologies (heat treatment, backed blades, edge ground axes).

3.5 Archaeological expectations for the 2A Greory Place site

The 2A Gregory Place site is located about 350m to the south of the Parramatta River and is situated at the southern edge of the SHR mapped extent PSB. There have been a few archaeological investigations on the river backplain compared with the PSB. Test excavation for the Light Rail in 2017 along the western edge of Robin Thomas Reserve found deep sand deposits associated with the PSB that extended to a depth of at least 1m. The 'bottom' of the PSB however not identified during the investigations and the depth represents the level test excavation was terminated.

Archaeological testing at James Ruse Reserve found thirteen stone artefacts, and in silty clay deposits dissimilar to those generally found on the PSB closer to the river. None of the finds were in situ and none were found lower than 0.85m below ground.

²³ Williams et al 2021.

Salvage excavation at 21 Hassall Street of a ~80cm deep portion of the alluvial terrace (situated adjacent to Clay Cliff Creek and positioned between 7.7m-8.5m AHD) recovered about 1,700 stone artefacts and the lowest cultural materials have been dated to the terminal Pleistocene.

It can be postulated that Clay Cliff Creek was likely to have attracted Aboriginal visitation and use in the past and it is possible that archaeological evidence of this may be present below the 2A Gregory Place site. Potential archaeology may be sparse and relate to short term, infrequent visitation, or there may be more extensive evidence associated with prolonged/repeated and frequent use. However, the early twentieth century ground levels have been excavated down to a depth of about 1.5m for the construction of the factory in the 1950s.

4.0 Aboriginal historical context

4.1 British discovery of Aboriginal Parramatta

Port Jackson was explored and charted by the British soon after landing at Sydney Cove. Captain Hunter and Lieutenant Bradley (HMS Sirius) examined first the eastern end of the harbour (28-29 January) and then followed (3 February) with the coves and inlets to the northwest (Lane Cove). The next day was the first of three explorations made by the British to establish the westward termination of the harbour (and to find agricultural land). The river landscape in the vicinity of the ‘head of the harbour’ was first seen by the British on 4-5 February by an exploration party led by Hunter along with three other officers and a dozen seamen. They were in a six oared boat (along with another small boat) when they reached the tidal flats near to the entrance to today’s Homebush Bay. Bradley described:²⁴

At noon we were far enough to see the termination of the Harbour as far as Navigable for ships, being all Flats above us with narrow passages that we supposed might run a considerable distance but very shoal. The harbour is navigable for ships twelve miles east and west and the branches extend six miles north and south. It is one continuation of harbour formed by snug coves with good depth of water and fresh water in many of these.

Bradley also noted²⁵ *‘there being assembled up here an astonishing number of Natives all Arm’d, Flats on which the boats might ground in this channel and put us much in their Power’*. Hunter describes:

We were a little surprised to find the natives here in greater numbers than we had ever seen them before in any other place.....they appeared very hostile, a great many armed men appeared upon the shore wherever we approached it, and, in a threatening manner, seemed to insist upon our not presuming to land. During the whole time we were near them, they hailed each other through the woods, until their numbers were so much increased, that I did not judge it prudent to attempt making any acquaintance with them.

The second exploration (15 February) reached the ‘Flats’ (Rhodes Point) and landed and explored the Concord area for 2-3 miles where trees were spaced *‘a considerable distance apart & the soil in general good. Grass very long & no underwood’*. Their likely route likely took them midway between Haslam’s Creek and the Parramatta River and possibly ended in the vicinity of Olympic Park. The next entry in Bradley’s journal states:²⁶

At 1pm, returned to Boats & after Dinner went in the smallest boat over the Flats and past a Mangrove Island [Mud island] & followed a Creek [Parramatta River] some distance to the W. ward when it branched away to the NW [Parramatta River] and SW [Duck River] which last we followed 4 Miles as near as we could judge, the lake or drain is very shoal and where we stop’d was entirely filled up with fallen trees from both sides, the water filling fast we had barely time to get down Boats, which we then join’d returned to the Ship.

²⁴ Bradley 1969:76.

²⁵ Ibid:76-77.

²⁶ Ibid: 82-84.

The third exploration party (April 22-27) was to pass through the future site of Rose Hill and to proceed west through Seven Hills and Blacktown to reach two hills with views over the Eastern Creek Valley below and towards the Blue Mountains in the distance. The first hill is believed to be today's Bungarribee Hill and the second hill is believed to have been Rooty Hill. During the trip they came across a few 'mean' Aboriginal huts that were located next to water holes and lagoons on the western outskirts of the future Rosehill township, and they saw fleeting glimpses of Aboriginal social activity in progress at Eastern Creek, but they made no direct contact with local Aboriginal groups in Parramatta or on the way west or on their return. The *Historical Records of NSW* version of Phillip's account of this expedition is:²⁷

I set off the 22nd of April, with six days provisions. We were eleven officers and men, and landed near the head of the harbour... We proceeded westward, finding the country in general as fine as any we ever saw, the trees growing from twenty to forty feet from each other... The country through which we past was mostly level, or only rising in small hills, which gave it a pleasing and picturesque appearance. The fifth day we got to a rising ground... The country round this hill was so beautiful that I called the hill BelleVeue...

John White's journal gives an eye-witness account and provides details of repeated evidence the explorers saw of Aboriginal people's presence and activity on the Country. White describes on 22 April:²⁸

The governor, accompanied by the same party, with the addition of Lieutenant Cresswell of the marines and six privates, landed at the head of the harbour [The landing site was at the confluence of the Parramatta and Duck Rivers], with an intention of penetrating into the country westward, as far as seven days provisions would admit of; every individual carrying his own allowance of bread, beef, rum, and water. The soldiers, beside their own provisions, carried a camp kettle and two tents, with their poles, &c. Thus equipped...we proceeded on our destination. We likewise took with us a small hand hatchet in order to mark the trees as we went on, those marks (called in America blazing) being the only guide to direct us in our return. The country was so rugged as to render it almost impossible to explore by the assistance of the compass.

In this manner we proceeded for a mile or two, through a part well covered with enormous trees, free from underwood. We then reached a thicket of brushwood, which we found so impervious as to oblige us to return nearly to the place from whence we had set out in the morning. Here we encamped, near some stagnant water, for the night, during which it thundered, lightened, and rained.

White describes on 23 April that having got around a wood or thicket which had 'harassed' them the day before they soon fell in with a 'hitherto unperceived branch of Port Jackson harbour' [Parramatta River] where the banks were grassed with tolerably rich, and chest high grass interspersed with a plant that closely resembled indigo. By skirting to the north of the thicket, the party emerged on the Parramatta River bank around two miles from their previous camp site that would be at a point just west of today's Thackeray Street.²⁹ The party then followed the Parramatta River west for a few miles, where the same tall grassland again prevailed, until they came to a fresh-

²⁷ Historical Records of NSW. Volume 1:134-134.

²⁸ White 1788:131ff.

²⁹ McClymont 2004:43.

water stream that emptied into the river. The party camped here overnight. This campsite was on Clay Cliff Creek and probably in the vicinity of River Road West to the west of James Ruse Drive.

On the 24 April the group walked along the southern bank of the Parramatta River where immense trees were spaced at a considerable distance from each other and the land was flat and low but well covered with long grass and shrubs as previously seen. This was in the vicinity of today's Queens Wharf and west towards probably the vicinity of the foot of today's Smith Street where White records here the tide stopped flowing and further progress for boats was stopped by a flat space of large broad stones over which a fresh-water stream ran.

The next day (after having sowed some seeds) the party proceeded west for three or four miles '*where we met with a mean hut belonging to some of the natives but could not perceive the smallest trace of their having been there lately. Close to this hut we saw a kangaroo, which had come to drink at an adjacent pool of stagnated water, but we could not get within shot of it. A little farther on we fell in with three huts, as deserted as the former, and a swamp, not unlike the American rice grounds*'. The party continued for two miles and then camped:

The country about this spot was much clearer of underwood than that which we had passed during the day. The trees around us were immensely large, and the tops of them filled with loraquets and paroquets of exquisite beauty, which chattered to such a degree that we could scarcely hear each other speak. We fired several times at them, but the trees were so very high that we killed but few.

The exploration party likely walked from their overnight camp upstream and turned west along Toongabbie Creek and followed Blacktown Creek west to where it branches and (possibly the site of the 'swamp' and Aboriginal huts) and then proceeded by compass over undulating higher ground roughly along the line of present-day Bungarribee Road. White describes the subsequent journey west to Eastern Creek.

26th April. We still directed our course westward, passed another tree on fire, and others which were hollow and perforated by a small hole at the bottom, in which the natives seemed to have snared some animal. It was certainly done by the natives, as the trees where these holes or perforations were, had many notches cut for the purpose of getting to the top of them.

After this we crossed a watercourse, which shews that at some seasons the rain is very heavy here, notwithstanding that there was, at present, but little water in it. Beyond the chasm we came to a pleasant hill, the top of which was tolerably clear of trees and perfectly free from underwood. His Excellency gave it the name of Belle Veue.

From the top of this hill, we saw a chain of hills or mountains, which appeared to be thirty or forty miles distant, running in a north and south direction. The northernmost being conspicuously higher than any of the rest, the governor called it Richmond Hill; the next, or those in the centre, Lansdown Hills; and those to the southward, which are by much the lowest, Carmarthen Hills. In a valley below Belle Veue, we saw a fire, and by it found some chewed root of a saline taste, which shewed that the natives had recently been there. The country hereabout was pleasant to the eye, well wooded, and covered with long sour grass, growing in tufts. At the bottom of this valley, or flat, we crossed another watercourse and ascended a

hill, where the wood was so very thick as to obstruct our view. Here, finding our provisions to run short, our return was concluded on, though with great reluctance, as it was our wish, and had been our determination, to reach the hills before us if it had been possible.

In our way back, which we easily discovered by the marks made in the trees, we saw a hollow tree on fire, the smoke issuing out of the top part as through a chimney. On coming near, and minutely examining it, we found that it had been set on fire by the natives; for there was some dry grass lighted and put into the hole wherein we had supposed they used to snare or take the animal before alluded to. In the evening, where we pitched our tents we shot two crows and some loraquets, for supper. The night was fine and clear, during which we often heard, as before, a sound like the human voice, and, from its continuance on one spot, we concluded it to proceed from a bird perched on some of the trees near us.

27th April. We now found ourselves obliged to make a forced march back, as our provisions were quite exhausted, a circumstance rather alarming in case of losing our way, which, however, we met with no difficulty in discovering by the marked trees.

Lieutenant Newton Fowell (Sirius) records that on their return:³⁰

He [Phillip] supposed he had been about 40 mile in Land & that it was all the Way like a Park with Trees about 20 yards Distance from each other – the Country in General quite a Plain – the Grass about 3 feet high & paths all the Way that Natives had made – at about the Distance of about 20 Miles from them when Furthest in Land they saw Mountains, the very tops of them can be seen in a clear day from the head of the harbour – Water in Land is in great Plenty – they saw Several Ponds – some of them 200 Yards wide.

Elsewhere around the harbour the British often fell in with Aboriginal paths that formed networks leading along rivers, between woods and through grasslands connecting the Aboriginal geography of the time. Hunter noted *‘these paths rendered our march, not only on account of pointing to us the most easy and accessible parts of the hills and woods, but, in point of direction, the shortest which could be found, if we had even been better acquainted with this tract’*.

Additional observations of Aboriginal Parramatta in early 1788 are recorded by Bradley who describes a further examination of the ‘shale beds’ at Rosehill (12 May 1788):

A party went up the harbour to the lake or creek running to the NW above the flats. We went about 3 Miles up, to a very fine run of water. The country on both sides pleasant and the ground apparently fit for opening, with far less trouble than any in the other parts of the harbour, and the soil good. A little above the part where the fresh water meets the tide is the place supposed would produce slate but had been found on examination not fit for working. Found a great number of cranes and other birds about and above the flats, all very shy.

³⁰ Quoted in Flynn 1995:21.

George Worgan was a surgeon on the Sirius, and described on 14 May:

I have had a most delightful Excursion to Day with Captn Hunter and Lt. Bradley, We went in a Boat about 12 Miles up the Harbour. For 3 or 4 Miles the Harbour forms a narrow arm, which at high Water, has the appearance of a River, the sides of this Arm are formed by gentle Slopes, which are green to the Water's Edge. The Trees are small and grow almost in regular Rows, so that, together with the Evenness of the Land for a considerable Extent, it resembles a Beautiful Park. We landed quite up at the Head of this Branch where a fresh Water River runs into it, but which, at this time was dry in many places. We walked about two Miles up the Country in the Direction of this River; the Ground ran in easy ascents and Descents, the Soil was extremely rich and produced luxuriant Grass.

We now and then, in our Walk, met with Clusters of a very delicate looking Tree, the Trunks of some of Them were 12. 14. 20 Inches round, covered with a green Bark, the leaves of a peculiarly beautiful Verdure and growing like the Fern, but more delicate. Having extended our Excursion as far as we wished, we returned to the Place where we landed and after regaling Ourselves with a cold Kangaroo Pie and a Plum Pudding, a Bottle of Wine &c, all which Comforts we brought from the Ship with Us, We returned on Board.

Worgan provides further details on the park-like appearance of the Country:³¹

In our Excursions inland....we have met with great Extent of Park-like country and Trees of a moderate Size and at a moderate Distance from each other, the Soil, apparently, fitted to produce of any kind of Grain, and clothed with extraordinary luxuriant Grass. It is something singular, that all, of this kind of Trees, and many others, appear to have been partly burnt, the Bark of them being like Charcoal.

Watkin Tench adds details about the nature of water availability and the grass and trees. He noted Phillip's exploration party did not encounter any '*rivulets*' (the term Tench also used to describe the Parramatta River at Rose Hill) but were reliant on water provided by '*standing pools*' which occurred in the valleys and were supposed to be formed by seasonal rainfall. This is likely describing chain-of-ponds drainage. Similar to observations made by others Tench also reported spaced trees with the intermediate space with thick rich grass that did not '*overspread the land in a continued sward*', but grew '*in small-detached tufts, growing every way about three inches apart, the intermediate space being bare*'. This grass grew in every place but the swamps (and (was '*found to agree better with horses and cows than sheep*').³²

4.2 The Country at Parramatta in 1788

The first descriptions of Aboriginal Parramatta and the Country westward to Eastern Creek was undulating terrain with plains and rolling hills that featured open grasslands and widely spaced trees with low-shrub and grass understories free of underwood. The Country was also interspersed with watercourses that occurred as

³¹ Quoted in Gammage 2011:44-45.

³² Tench 2005a.

discontinuous chains of ponds and wetlands, and the appearance of this landscape was consistently described by the British as resembling ‘park-like country’.

These observations suggest the landscapes described were constructed and maintained. Hunter alludes to this when describing the land at the head of the harbour: ‘*there is a very considerable extent of tolerable land, and which may be cultivated without waiting for its being cleared of wood; for the trees stand very wide of each other, and have no underwood: in short, the woods on the spot I am speaking of resemble a deer park, as much as if they had been intended for such a purpose*’.³³

Hunter recognised Aboriginal divisions of the Country between Rosehill and Prospect-Hill. He thought it ‘*remarkable, that although the distance between these two places is only four miles, yet the natives divide it into eight different districts*’.³⁴ Flynn describes in 1790 William Dawes (guided by Bennelong) would an ancient network of pathways in the area to record eight Aboriginal places you would come to in succession after walking so many minutes westward for four miles from Rosehill before reaching Prospect Hill; *Parramatta, Wau-maille, Malgray-matta, Era-worong, Carramatta, Boolbane-matta, Carro-Wotong, and Marrong* (Prospect).³⁵

The higher (Pleistocene) terraces at Parramatta were woodlands dominated by grey box (*Eucalyptus moluccana*) and forest red gum (*Eucalyptus tereticormis*) with an open grass understorey, whilst the lower terraces had paperbarks (*Melaleuca linariifolia*) and/or rough-barked native apple (*Angophora floribunda*) depending on soil drainage.³⁶ Historical documents do not record the presence of she-oaks (casuarinas) such as black she-oak (*Allocasuarina littoralis*), or river-oak (*Casuarina cunninghamiana*) or saltwater tolerant swamp-oak (*C. glauca*).³⁷ The data point to the landscape that was cleared was ‘*a savanna grassland with scatted eucalypts (Eucalyptus sensulato), sclerophyll shrubs (rare) and she-oaks (Allocasuarina/Casuarina spp.) lined local creek lines on the Pleistocene terraces and probably the sides of the river valley upstream of the tidal limit*’.³⁸ The open and lightly wooded grassland is believed to have been shaped and maintained by Aboriginal people over an extended period of time who managed the landscape and its ecological communities through the use of varying intensities were used to create mosaic grassland and woodland ecological communities that contained, attracted different animals, and promoted different plants fire.³⁹

³³ Hunter 2005.

³⁴ Hunter 2005.

³⁵ Flynn 1995:30.

³⁶ Benson & Howell (1990)

³⁷ Macphail & Casey (2008)

³⁸ Macphail & Casey 2008.

³⁹ See Fletcher et al 2020; Gammage 2013; 2014; Hunter 2017; Mooney et al 2012.

4.3 British settlement at Rosehill

In November 1788 surveyors and marines had been to the Crescent in Parramatta Park to mark out the ground for a ‘redoubt’ and convicts were sent who ‘understood the business of cultivation’. It is likely James Ruse was amongst this party. By July 1789, a ‘small redoubt was thrown up, and a captain’s detachment posted in it, to protect the convicts who were employed to cultivate the ground’.⁴⁰ Collins reported ‘some ground had been opened on the other side of the stream of water which ran into the creek.....in which the produce of the ground he (Henry Dodd) was then filling with wheat and barley was to be deposited’⁴¹.

During this period, areas were cleared and cultivated south to today’s Great Western Highway, past Northmead to the north, and to the east the Government Farm stretched as far as present-day Charles Street. The main street at Rose Hill (High Street, later George Street) was laid out on an east-west axis from Government House to the first wharf. This broadly followed a part of a track ‘blazed’ by Phillip’s’ earlier exploration party to assist following explorations journeying from Sydney Cove to find Rose Hill.

Tench (1979:246) described the alignment of the road from starting near the Landing Place to the Governor’s house was a mile long and in many places was ‘carried over gullies of considerable depth, which have been filled up with trunks of trees, covered with earth’. By September 1790 ‘twenty-seven huts were in great forwardness at the end of the month’ (ibid:113), and by November 1790 thirty-two houses were completed.⁴² By the end of 1791 one hundred houses were finished.

4.5 James Ruse and Experiment Farm

James Ruse had a hut built for him and to an acre and a half of ground cleared before he took occupancy of his land grant in November 1789. The Governor promised that if he made a success of his farm, it would be increased in size to thirty acres. A deed of grant issued in March 1791 called the grant ‘Experiment Farm’ and describes it was situated near the ‘barracks ponds’ (Jervis 1935) and is likely to refer to a chain of ponds or lagoons were once a dominant feature of the natural landscape in this part of the early town.

Watkin Tench visited his farm in 1790. Ruse advised although he did not know the precise limits of his land, he had cleared and burnt the fallen timber and cultivated as much land as he could. The northern boundary of Experiment Farm was adjacent to Clay Cliff Creek that drained the low-lying area sited to the east and south-east of the town from around where the railway station is now sited and emptied into Parramatta River near present day James Ruse Drive and where Phillip and his party has camped in April 1788.

⁴⁰ Tench 1979:136.

⁴¹ Collins 1798:46.

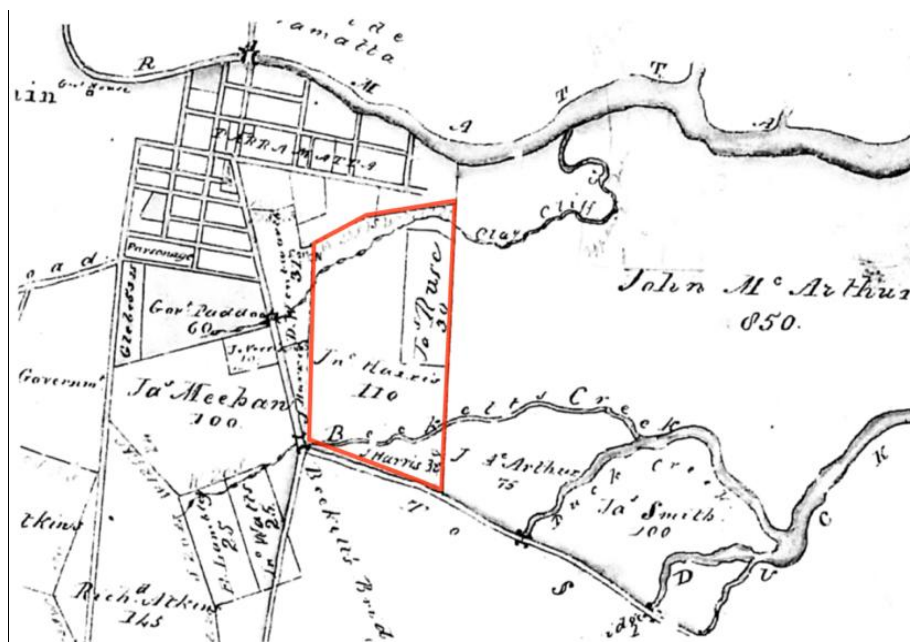
⁴² Tench 1979:195.

By early 1791 Ruse could support himself and family without assistance from the government store. In March 1791 Phillip moved to increase Ruse's land to 30 acres with Clay Cliff Creek playing the central role in the agricultural use of the land. Aside from being a source of fresh water, it was on the alluvial flats of Clay Cliff Creek above the river that Ruse grew crops. However, his self-sufficiency could not be sustained because of drought and the rapid decline in agricultural fertility of the soils on his land ('soil exhaustion'). In October 1793, his land grant (30 acres) was sold to Surgeon John Harris who had arrived in the colony in 1790 as surgeon's mate to the New South Wales Corps and was stationed at Parramatta by May 1791.

The grant of 110 acres made to John Harris in February 1794 was bound on the north by present-day Hassall Street and on the south by Becketts Creek. In addition to Becketts Creek the grant included a section of Clay Cliff Creek. Harris continued to add to his land holding at 'Harris Farm' over the following years and from June 1793 he lived there temporarily.⁴³

Existing Experiment Farm Cottage is believed to have been built in the mid-1830s although a mid-1790s date has also been proposed. In the 1790s Harris' attention was focussed on Harris Farm (and on developing his grant at Ultimo from around 1804) and details of how the land was used is revealed in land and stock returns. In February 1794, 40 acres of the 110 acres were cropped with wheat, 70 acres were about to be planted with maize, there were 120 sheep and 300 goats, and the clays of Clay Cliff Creek were also extracted for brick making.

Figure 4.1: Detail from the map of the parish St John dated around 1835. The extent of John Harris' land by grant and purchase is delineated (Source: Land & Property Information)

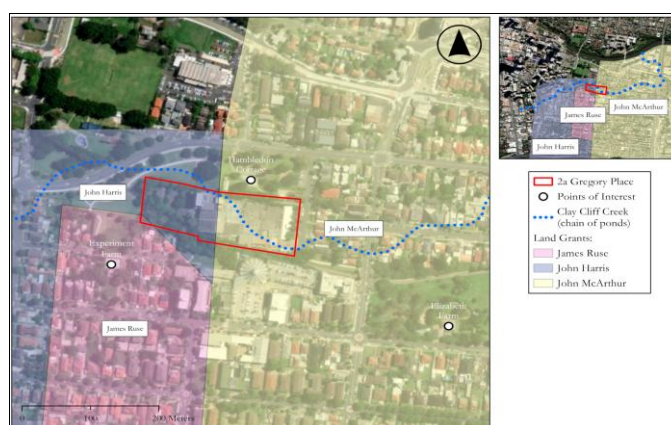


⁴³ Rosen 2009:107.

4.6 Elizabeth Farm and Aboriginal connections

It is likely the land taken in by what was to become Elizabeth Farm contained a diversity of food and resource ecologies and long-used campsites and other social places important to Aboriginal people when Macarthur received his first grant of 100 acres at Rosehill in 1793. The Macarthur landholding encompassed the peninsula of land bound by Parramatta River to the north and Duck River to the south. Today this land slopes down from west to east from a high point (12m AHD) adjacent to Rosehill Railway Station after which the land falls to 7m AHD at Rosehill Racecourse and then drops to about 3m AHD near the confluence of Parramatta and Duck Rivers. This landscape will likely have contained a complex mosaic of savanna grasslands, woodlands and both saltwater and freshwater wetlands. Fabric of the Country also provided the raw materials used for the first Elizabeth Farm buildings including hand-moulded bricks that were made from clay sourced from Clay Cliff Creek and the roof formed with shingles made from swamp oaks. Bricks were made from a pit near Camellia Station and that lime was made from shells that were procured from the *'great kitchen middens found along the riverbanks at the time'* that were processed a little to the east of the clay-pit (site of the Australian Kerosene and Oil Company).⁴⁴

Figure 4.2: Historical British land ownership context of the 2A Gregory Place site



Aboriginal people visited and camped on Elizabeth Farm including Tedbury (Pemulwuy's son) and two young men known as Bill and Harry who were related youths of the same age and inseparable companions.⁴⁵ They became attached to the same girl and Harry (who was of more gentle disposition) was favoured by the girl. Bill (in an evil temper) speared Harry whilst he was asleep. Harry survived, but his people were highly incensed and according to customs, Bill would have to face spears thrown at him from several men in ritual punishment including from Cogy who was from the Cowpastures. Bill was speared by Cogy and died in an Elizabeth Farm outhouse and was buried nearby (location unknown).⁴⁶

⁴⁴ Fowle 1919:7.

⁴⁵ Bennett 2014:68.

⁴⁶ Ibid:68,72 (transcription of William Macarthur's reminiscences [ML MSS A2935]).

4.7 Aboriginal resistance on Clay Cliff Creek

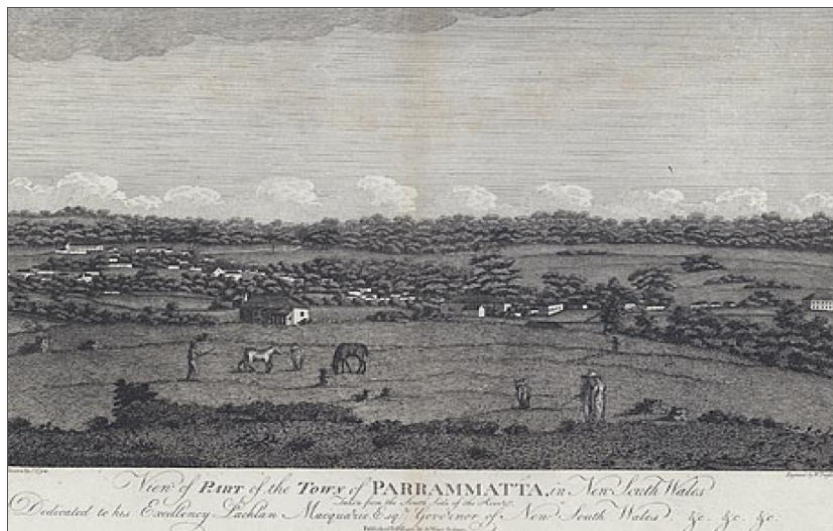
In 1797 a party of Aboriginal men led by Bidjigal warrior Pemulwuy attacked the military barracks (Robin Thomas Reserve) located on the ‘barrack ponds’. Pemulwuy had raided the government farm at Toongabbie and a vigilante group of armed settlers and soldiers had chased about 100 Aboriginal people to the town outskirts. The Aboriginal group massed on the northern side of the river (possibly around the Government farms) and then crossed the river and marched in ranks down High (George) Street to attack the barracks. The fight that followed killed at least five Aboriginal people and possibly as many as fifty. Pemulwuy himself was shot several times and taken to the hospital before escaping wounded and in irons.

Renewed conflicts in 1805 led Governor King to reimpose bans that prohibited Aboriginal people approaching settler dwellings in the ‘out-settlements’. This included Parramatta.

4.8 Agricultural development of the land

Relatively little is known of the physical development of Harris Farm in the nineteenth century. An engraving made around 1812-1814 by Walter Preston is believed to show John Harris' cottage.

Figure 4.3: Preston's view from the south side of the river depicting the rear of Harris' cottage within thirty acres granted to Ruse. Note paucity of tree stumps (and inferred light woodland and wide tree spacing) shown (Source: National Gallery of Australia)



4.9 Aboriginal people in Parramatta during the Macquarie period

The Native Institution at Parramatta officially opened in January 1815. It was located in the middle of town and was intended to operate as a ‘boarding school’ for Aboriginal children. Both sexes would receive religious instruction whilst being taught to read and write. The boys were to be taught manual labour and agriculture methods and the girls how to sew, knit and spin.

The plan was for when the children who had been admitted to the place had matured, they would be paired off, married and settled on farms as couples.⁴⁷ In March, Macquarie reported only two months after the (official) establishment of the Institution that six children had been taken away by their parents.⁴⁸ In April Macquarie ordered the capture of twelve Aboriginal boys and six girls between four and six years of age for the Institute.⁴⁹

At the annual feast in 1818, Macquarie presented gorgets to people including '*Cogie as Chief of the George's River Tribe and to Norwong as Chief of the Botany Tribe and the Order of Merit to Tindall of the Cow Pastures and Pulpin of the Hawkesbury Tribe*'.⁵⁰ Almost 300 Aboriginal people attended the feast in 1819 with some travelling from beyond the Blue Mountains and '*from the North and South who had travelled a distance of upwards of 100 miles*'.⁵¹

4.10 Aboriginal people in Parramatta in the 1820s

In the area between Parramatta and the Blue Mountains, the 1828 census records Aboriginal people were living at Parramatta, Richmond, Mulgoa, Burragorang, Cowpastures, Nepean and McDonald Rivers. The 'Parramatta Tribe' had just under fifty members. Later returns (1834-1843) do not record a Parramatta Tribe but identify groups attending Parramatta for blanket distributions including people from Duck River, Kissing Point, Breakfast Creek, and Eastern and South Creeks.

Governor Darling initiated an annual distribution of blankets and cheap 'slop' clothing to Aboriginal people in 1826. To account for the cost, what are called 'blanket returns' were created. These generally included an Aboriginal individual's English and traditional name, probable age, number of wives, children, tribe, and district of usual resort. The first general distribution of blankets was in 1827. Aboriginal people had a camping place near the junction of Union Street and Dog-Trap-road (Woodville Street) that continued to be used over the years when people travelled to Parramatta to receive blankets and '*those coming from the south chose this spot and those from the west camping near where Camellia Station now stands*'.⁵²

4.11 Hambledon Cottage and 'Neale's Cottage'

Hambledon cottage was constructed in c.1824 for the Macarthur's children's nanny, Penelope Lucas, who lived there from 1827 until 1838 after which ownership transferred to Edward Macarthur. It was initially occupied in 1825 by Thomas Hobbs Scott (first Anglican Archdeacon of NSW) who built a stable and a single storey brick coach house as an addition to Hambledon cottage on its western side.

⁴⁷ Brook 1996:7.

⁴⁸ Historical Records of Australia. VIII:467.

⁴⁹ HRA. IX:858).

⁵⁰ Macquarie Journal, 1 January 1818.

⁵¹ Sydney Gazette, 2 January 1819.

⁵² Fowlie 1919.

George Neale was a wheelwright who worked for the Macarthur family for most of his adult life. In 1831 he and Bridget Neale and their young daughter Elizabeth Mary moved into a small timber cottage that had been built between Hambledon Cottage and Clay Cliff Creek. In c.1854 a replacement brick cottage was built for the Neale family by Edward Macarthur within the immediate vicinity of the Gregory Place site.⁵³

Figure 4.4: A single fronted cottage facing east, enclosed by a semi-circular picket fence, with stables and outbuildings to the south. The well-established garden and coach house of Hambledon is seen to the north across a three railed hardwood fence



4.12 Early twentieth century change to Clay Cliff Creek

George Neale (widower) surrendered his lifetime leasehold in 1882 and the cottage passed through various owners before it was demolished (prior to the construction of the pharmaceutical factory that currently occupies the land). The 1895 Detailed Survey of Parramatta shows a group of buildings in the vicinity of the Gregory Place site and a rectangular stable/sheds structure to the southwest of Hambledon Cottage extended across the boundary of the study area. It appears that Neale's Cottage was demolished sometime before 1943 when the Land was purchased by the Goodyear Tyre and Rubber Co.

⁵³ Historic House Trust, 'On the Hoof', 2006.

Figure 4.5: 2A Gregory Place site shown as vacant land crossed by the stormwater channel of Clay Cliff Creek in 1943



Figure 4.6: The study area in 1961 (Sullivan-ES 2015)



With rapid urbanisation of land from the late 1870s sanitary conditions deteriorated and by 1890 channelling the watercourse was thought necessary.⁵⁴ Only a portion of the concrete channel, between Church and Station Streets was completed in the early 1890s. Tenders for the construction of the extension of the channel east and across Harris were called for in 1894. The project then stopped (lack of funds) in 1895 only to be revived in the late 1890s with completion of the channel to the west of Harris Street by 1900.⁵⁵ Harris Street was the terminus of the channel for several years and there was continued flooding of the old creek course east of Harris Street.⁵⁶

⁵⁴ Cumberland Argus, 21/2/1891.

⁵⁵ Cumberland Argus, 21/11/1900; 17/4/1901).

⁵⁶ Cumberland Argus, 4/7/1914.

5.0 Existing conditions

5.1 Buildings

The former 1950s factory site is located approximately 6.5m to 4.5m above sea-level (AHD)⁵⁷ and comprises a relatively flat concrete or asphalt sealed surface that is also largely covered by a number of main buildings and works areas illustrated below. The main buildings on the site comprise an office/warehouse/factory building that covers about two-thirds of the property, with an asphalt carpark covering the western area and concrete loading dock covering part of the southern area.

An open storm-water channel gently grades from the west from 2.67m to 2.13m RL (and is 6m wide and 3m deep from ground level) that contains the flow of Clay Cliff Creek runs the length of the southern site boundary then cuts through the site in the southwest corner. Clay Cliff Creek drains to the east and eventually empties into the Parramatta River adjacent to James Ruse Drive.

Figure 5.1: Indicative external building space along southern side of site (looking west) showing the boundary it shares with the grounds of Hambleton Cottage (left) and the extent to which the factory construction has lowered the ground here



⁵⁷ Sullivan Environmental Services 2021:13.

Figure 5.2: Indicative external space – southern side of building (looking east). Note to the right the difference in height between the existing (higher) ground on the adjacent Hambleton Cottage grounds and the bitumen surface



Figure 5.3: Building and car park surface at the eastern side of the site



Figure 5.4: Indicative internal spaces (warehouse) in the east and center of the site



Figure 5.5: Indicative internal spaces (manufacturing and offices) in the western part of the site



Figure 5.6: Indicative internal space in the northwestern part of the site (looking east). The channel for Clay Cliff Creek is about 6m to the right (obscured by vegetation)



Figure 5.7: Indicative view of the canal for Clay Cliff Creek (looking east)



5.2 Contamination

An assessment of the presence of soil and groundwater contamination provides recommendations for additional investigations or remediation. Sampling points for this investigation are shown by the site plans drawn from this study reproduced below.⁵⁸

Figure 5.8: Sampling locations (Sullivan Environmental Services 2021)

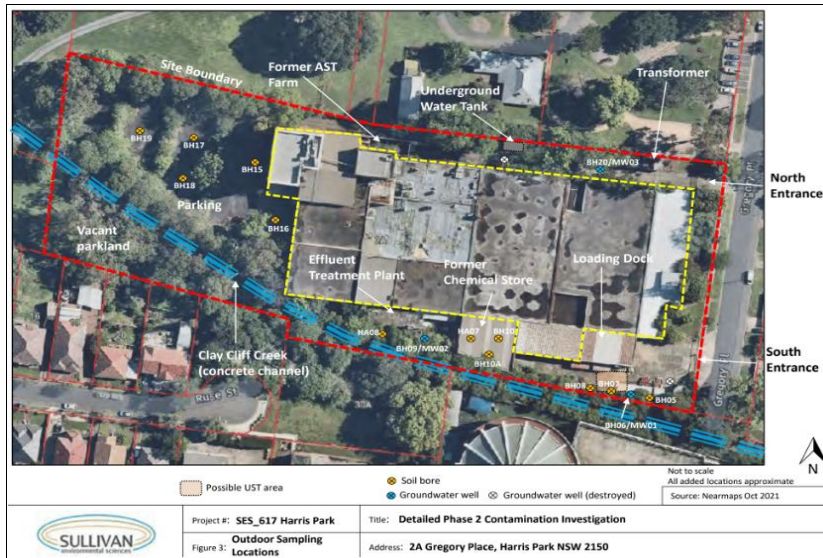
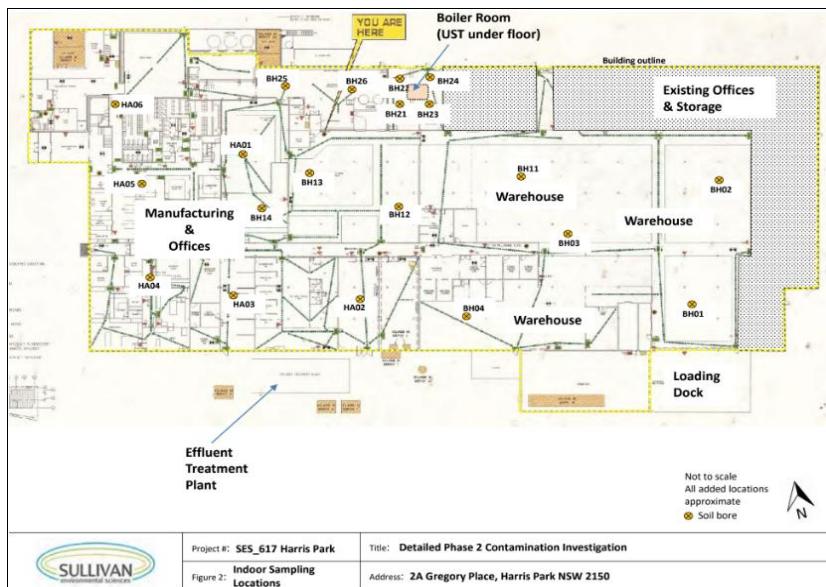


Figure 5.9: Indoor sampling locations



⁵⁸ Sullivan E-S March 2022.

Figure 5.11: Outdoor soil exceedances (Sullivan E-S 2021)

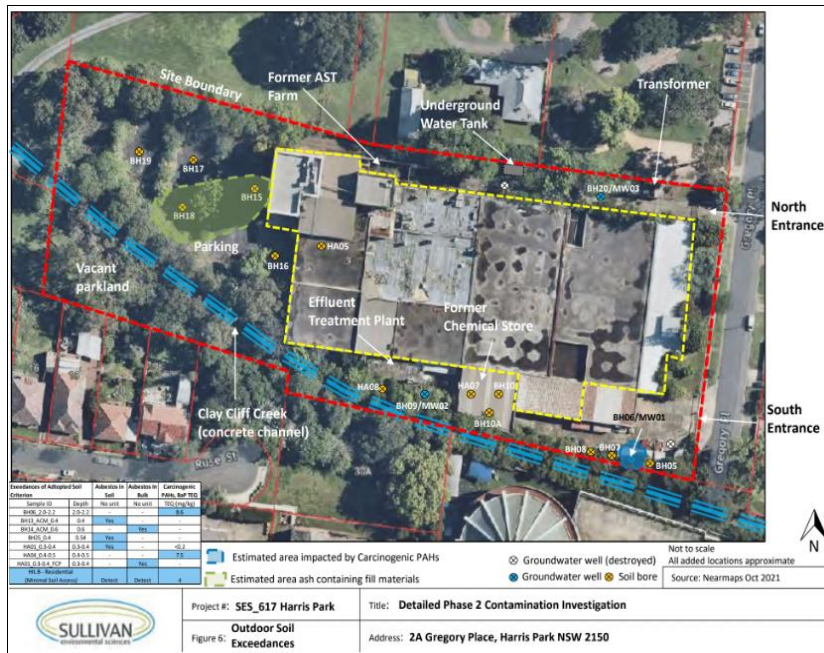
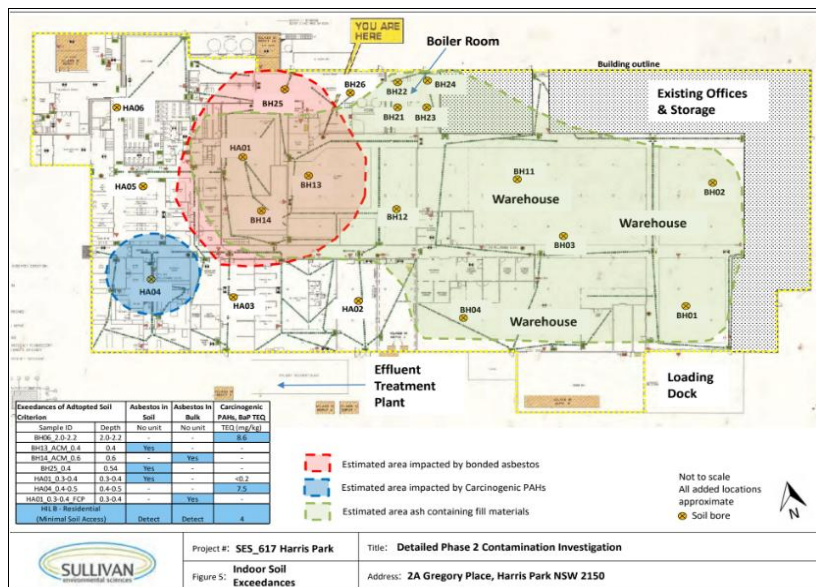


Figure 5.12: Indoor soil exceedances (Sullivan E-S 2021)



Key findings of this study are:

- Asbestos containing fibre cement fragments in fill at BH13, BH14, BH25 and HA01. Sealed under concrete beneath area of main building. Potential risk to future site users by asbestos impacted fill that requires remediation prior to or during site development.

- Gravelly sandy fill soils at HA04 and BH06 have carcinogenic PAHs. Areas sealed under concrete but potential risk that requires remediation prior to or during site development.
- Potential acid generation of soils deeper than 1.5m may not require treatment but shallower soils at boreholes BH05 and BH19 have high values.
- Exact position of suspected UST near loading dock not verified but likely under Boiler Room floor.
- Liquid contained within ETP tank is waste and requires disposal offsite during decommissioning.

The DSI recommends:

- Decommissioning of USTs.
- Remediation of impacted fill materials for bonded asbestos in and around BH13, BH14, BH25 and HA01 and remediation of impacted fill materials for carcinogenic PAHs at HA04 and BH06.
- Further investigation and assessment for a number of locations.

5.3 Geotechnical information

5.3.1 Sampling

Geotechnical investigations have been undertaken at the site. Sampling comprised drilling of five boreholes to a maximum depth of 18.0m and four boreholes drilled to a maximum depth of 7.0m.⁵⁹

Figure 5.13: geotechnical sampling locations (Alliance Geotechnical Pty Ltd 2022)



⁵⁹ Alliance Geotechnical Pty Ltd February 2022.

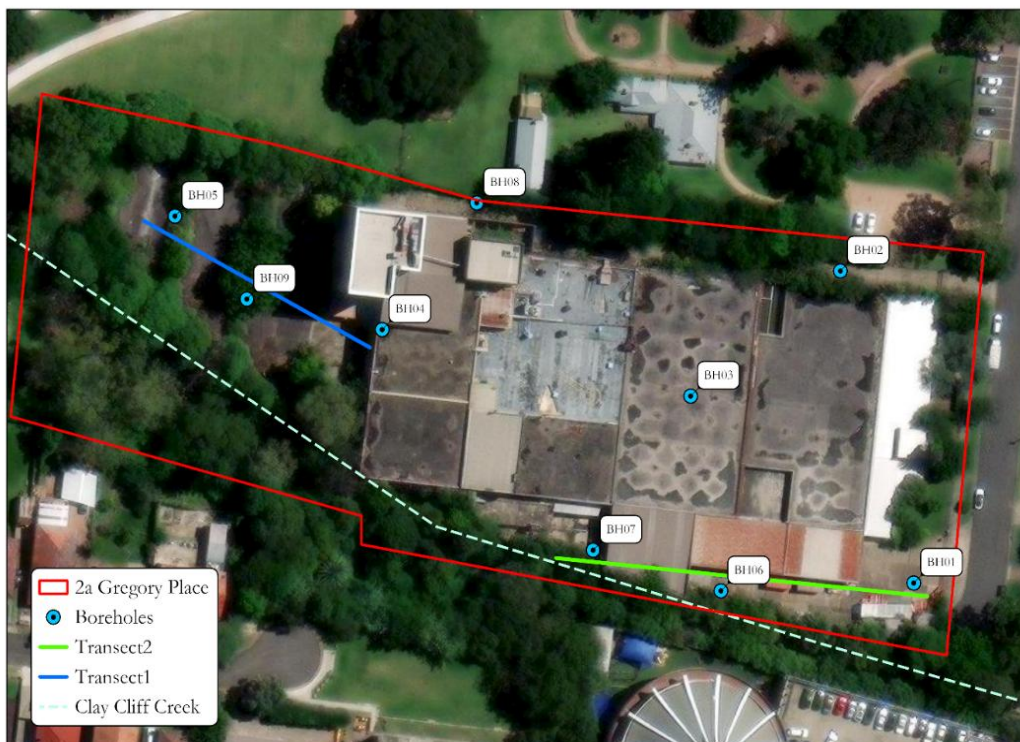
5.3.2 Bore-log data

The bore-logs for the geotechnical investigations show the subsurface profile below the existing concrete and asphalt ground surfaces across the site consists of up to 1.5m thick deposits of uncontrolled fill that is underlain by very soft to firm alluvium silty clay which is up to 5.9m thick.⁶⁰ Stiff to very stiff residual clay, up to 1.5m in thickness, underlies the alluvium clay in areas. The alluvial/residual soil is underlain by extremely weathered, very low strength shale (ranging in thickness from 1.1m to 5.5m), which is underlain by fresh, medium to high strength shale at -6.4mRL and -0.8mRL.

5.3.3 Subsurface profiles

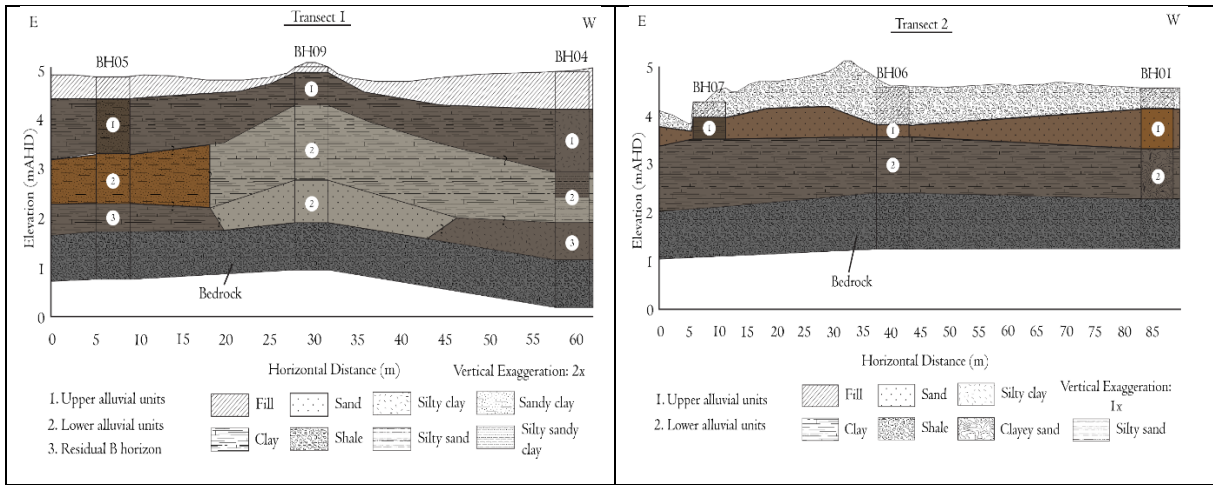
We have used the geotechnical descriptions and data and have redrawn the geotechnical bore-logs to create indicative stratigraphic profile drawings of the sediments that underlie the buildings and hard surfaces across the 2A Gregory Place site by grouping sample points in two transects as illustrated below.

Figure 5.14: Transect lines for redrawn (from geotechnical bore logs) indicative stratigraphic profile diagrams to show the subsurface deposits that are below the 2A Gregory Place site



⁶⁰ Ibid: Table 6 and Appendix C (bore-logs).

figure 5.15: Subsurface deposits that are below the 2A Gregory Place site



5.3.4 Summary of the subsurface profiles at the site

The 2A Gregory Place site has been cut down by around 1.5m from current ground levels and has deposits of fill over in situ alluvial deposits. In the east there is an upper and a lower alluvial unit that is over sandstone bedrock. In the west, this two-unit alluvial sequence is over residual B-horizon clay and then bedrock and in this area there is a sandy unit that appears to truncate these in situ alluvial deposits.

6.0 Our understandings in summary

6.1 Clay Cliff Creek

The table below summarises natural and cultural heritage values that have been identified through research and discussed with the Aboriginal community in the course of developing this report. It is framed around values of Clay Cliff Creek because this watercourse is foundational to the Aboriginal and non-Aboriginal history and heritage of this part of Parramatta.

Table 6.1: Clay Cliff Creek natural and cultural heritage values

Natural values	Aboriginal heritage values	Non-Aboriginal heritage
<p>What is Clay Cliff Creek?</p> <p>Fresh water drainage extending from Merrylands in west and draining east to cross river floodplain to empty in river</p> <p>'How old' is Clay Cliff Creek?</p> <p>Dating of levee formation at one site to about 15,000 BP</p> <p>'Antiquity' of Clay Cliff Creek</p> <p>Newspaper articles about former alignment of Creek and associated former swampy environments</p> <p>Form of Clay Cliff Creek in 1788</p> <p>Discontinuous chains of ponds/wetlands</p> <p>Setting and conditions in 1788</p> <p>Lightly wooded grassland with wide spaced trees and grass, floodplain likely to include swampy meadows</p> <p>Managed Aboriginal landscape</p> <p>Open and lightly wooded grassland believed shaped and maintained by Aboriginal people (fire management).</p> <p>Decline/demise of Clay Cliff Creek</p> <p>Natural values eroded as a direct result of the first farming and grazing in 1788-1789.</p>	<p>Archaeological evidence</p> <p>Excavation at 21 Hassall St recovered 1,700 artefacts related to two periods; occupation from c.13,000-6,000 years ago overprinted by late Holocene visitation (5,000-2,000 BP)</p> <p>Testing at James Ruse Reserve found artefacts in environment considered not favourable campsite compared to higher ground closer to river</p> <p>Aboriginal connections after 1788</p> <p>Military Barracks at 'Barrack Ponds' as conflict/resistance site (Pemulwuy 1797)</p> <p>Interactions with Aboriginal people at Elizabeth Farm. Bill speared by Coggy, died in outhouse and buried nearby</p> <p>Continued Aboriginal camping around 1800 associated with land owned by William Cummins (later becoming part of Macarthur's land holdings)</p> <p>Camping during conferences and blanket distributions (Camellia Station)</p>	<p>First settlers use of resources</p> <p>Landscape colonists 'inherited' likely contained a complex mosaic of grasslands and woodlands, and saltwater & freshwater wetlands,</p> <p>The fabric of the Country provided raw materials needed to feed and house and sustain the British. Elizabeth Farm building includes bricks made from clay sourced from Clay Cliff Creek via a pit near Camellia Station and lime made from shells from middens that were processed east of clay-pit. The roof was also formed with shingles made from swamp oaks</p>

6.2 Archaeological expectations

6.2.1 Aboriginal land use

It is probable that the backplain of Parramatta River was a 'secondary' landscape but it had permanent fresh water (Clay Cliff Creek) and also likely contained valuable resources and was probably frequently used by people for travel and short term stops. One previously excavated and dated site on Clay Cliff Creek (21 Hassall Street) has revealed deep time occupation deposits related to repeat visitation and multiple activities. A second (undated) excavated site (skate park) showed evidence for infrequent use and limited activity.

On this basis, it is possible that evidence for past Aboriginal visitation is present below the 2A Gregory Place site but there is insufficient evidence to predict what may be present or survive given the depth of disturbance to the original ground surfaces that have resulted from modern building.

6.2.2 Modern land use impacts on potential archaeological resources

The former factory is positioned between ~6.5m to 4.5m AHD and the open storm-water channel of Clay Creek defines the southern site boundary and also crosses through the property in the southwest corner. It is likely that the back-plain between Clay Cliff Creek and the Parramatta River originally had uneven and low-lying surface topography that featured chain of ponds drainage. In the 1790s Clay Cliff Creek was described as the 'Barracks Ponds' and was later mapped (1830s) to retain a chain-of ponds form (rather than a continuous incised creek channel), and in the 1850s the watercourse was described to continue to be '*generally a series of waterholes*'

There is a possibility soil and sediments that occur below levels of historical disturbance may contain Aboriginal objects. However, the land use history of the 2A Gregory Place site that comprised continuous agriculture for 150 years followed by industrial building construction has resulted in the destruction of the original chain of ponds drainage and removal of original ground surfaces. Geotechnical data for the site show that most parts of the property have been deeply cut down by the 1950s factory construction and to depths of approximately 1.5m and deeper below the main building of the former factory.

7.0 Significance assessment

7.1 Heritage assessment criteria

Cultural significance is defined by the *Burra Charter* as ‘*aesthetic, historic, scientific or social value for past, present or future generations*’ (Article 1.1). Linking the assessment process with a site's historical or archaeological context is achieved via the use of evaluation criteria which reflect significance categories and representativeness whereby a site, place or item can be evaluated in the context of State or Local historical themes.

Documented and potential historical archaeological sites are routinely evaluated according to these criteria. These criteria do not easily apply to Aboriginal archaeology but are used here to provide a general guide to support the Aboriginal archaeological heritage assessment of the site presented below:

- Criterion (a) – an item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area).
- Criterion (b) – an item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (or the cultural or natural history of the local area).
- Criterion (c) – an item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area).
- Criterion (d) – an item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons.
- Criterion (e) – an item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area).
- Criterion (f) – an item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the cultural or natural history of the local area).
- Criterion (g) – an item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places, or cultural or natural environments.

Different components of a site, place or item may make a different relative contribution to its heritage value. Loss of integrity or poor condition that are factors most commonly caused by development impacts on archaeological sites, may diminish a site or an item's significance. Relative grades that can be used to determine the heritage significance of items (both built and archaeological) include:

- **Exceptional:** Rare or outstanding item of Local or State significance. High degree of intactness. Item can be interpreted relatively easily. Fulfils criteria for Local or State listing.
- **High:** High degree of original fabric. Demonstrates a key element of the item's significance. Alterations do not detract from significance. Fulfils criteria for Local or State listing.

- Moderate: Altered or modified elements. Elements with little heritage value but which contribute to the overall significance of the item. Fulfils criteria for Local or State listing.
- Little: Alterations detract from significance. Difficult to interpret. Does not fulfil criteria for Local or State listing.
- Intrusive: Damaging to the item's heritage significance. Does not fulfil criteria for Local or State listing.

7.2 Assessing Aboriginal archaeological heritage significance

This assessment of significance of the potential Aboriginal archaeological resources contained within the 2A Gregory Place site below follows current OEH guidelines (NPWS 1997:5-11) and uses the additional criteria derived from the Burra Charter. A position that needs to be made clear as part of the assessment process is that not all sites are equally significant and not all heritage sites at a general level will warrant equal consideration and management. Heritage NSW guidelines for the assessment of significance of Aboriginal sites identify two types of significance criteria; *cultural* and *archaeological significance*.

Cultural significance concerns the values of a site or feature to a community group which in this case is the local Aboriginal community. Aboriginal Archaeological sites, objects, and some landscapes are often important for varied reasons or have become important to Aboriginal people over time. This involves people's historical links to Country in general and possible attachments to specific areas as well as an overall concern of many Aboriginal people for the protection of the land and its cultural heritage sites.

Scientific significance in archaeological contexts is usually assessed using criteria that aim to evaluate a given site's contents, state of preservation (integrity), representativeness or rarity, and research potential. A preliminary evaluation of the significance of the potential Aboriginal archaeological resources at the site according to the criteria below is provided using the following as a guide:

- *Archaeological research potential* incorporates values of intactness (whether it has stratigraphic integrity or is disturbed), the association of the site to other sites in the local or regional (or State) context, and sometimes also how the site may fit into a datable chronology if one exists, when considering how the site may contribute to our further understanding of past Aboriginal life. This area of assessment is consistent with *Criterion 'e'* of the *Heritage Branch* guidelines.
- *Representativeness* is a term to convey the idea that most Aboriginal archaeological sites are representative of a particular 'type' or sub-type/class which for example would apply to a rock shelter with art as distinct from an open campsite with stone artefacts. A key issue is what sites should be conserved to ensure a representative sample of the archaeological record is retained for future generations. This general area of assessment is consistent with *Criterion 'a'* of the *Heritage Branch* guidelines.
- *Rarity* can apply to a unique or uncommon archaeological site itself or elements of its component parts (archaeological rare finds or contexts), and can be assessed at a local, regional, State, and national level. This area of assessment is consistent with *Criterion 'a'* of the *Heritage Branch* guidelines.

7.3 Assessment of significance against criteria

Criterion (a) – an item is important in the course or pattern of NSW’s cultural or natural history

The Gregory Place site is located within an ancient river valley landscape whose natural and cultural evolution can be traced back through archaeological and environmental evidence that is contained within and recovered from the State Heritage Register-listed Parramatta Sand Body (PSB) to the Late Pleistocene.

The 2A Gregory Place site is located on the Parramatta River back plain and about 350m to the south of the river and is positioned on the southern edge of the SHR-listed distribution of the PSB.

The land at Rosehill formed part of the traditional territory of the Burramattagal and Wategora people. This Country was first seen and partially explored by the British between early February and April 1788 during explorations led by Governor Phillip to find critically needed agricultural land.

The agricultural settlement of Parramatta led to the rapid displacement of the Aboriginal owners of the Country and the taking of this land and its catastrophic impact on Aboriginal people is important in the course of NSW’s cultural history.

Criterion (b) – an item has strong or special association with the life or works of a person, or group of persons

Parramatta has a well-documented late eighteenth and early nineteenth Aboriginal history and the names and some of the lives of some Aboriginal people during this period are known. However, we know more about the lives of the non-Aboriginal people who built and occupied the surviving early nineteenth century structures (Experiment Farm, Hambledon Cottage, Elizabeth Farm) that are the basis for the traditional narrative (Ruse, Macarthur, Harris) under this criterion.

Criterion (c) – an item is important in demonstrating aesthetic and/or a high degree of creative/technical achievement

The landscape at Harris Park in 1788 is likely to have been culturally shaped by Aboriginal people and the Parramatta River backplain probably supported savannah grassland and had spaced timber but there are no historical images of how the place looked before the factory was built.

Criterion (d) – an item has strong or special association with a particular community or cultural group

Aboriginal community consultation shows we should view the site as representing and forming a part of wider Aboriginal cultural heritage landscape at Parramatta with values important to contemporary Aboriginal communities. These values include the recognition and respect and care for the ongoing health of the now channelled Clay Cliff Creek and the relationship of this watercourse to the Parramatta River, and the site’s potential subsurface archaeological and paleoenvironmental records.

Criterion (e) – an item has potential to yield information

The subsurface alluvial soils and sediments that geotechnical and contamination bore-logs show are present below the footprint of the 2A Gregory Place site may contain Aboriginal objects, archaeological deposits, and environmental evidence.

There is potential for the 2A Gregory Place site to yield information that may contribute to an understanding of the cultural and natural history of Parramatta.

However, the site has been impacted by ground excavations for the building of the factory in the 1950s and this has lowered the original ground levels that are still largely intact in the adjacent Hambleton Cottage grounds. As a result of this land use the upper portions of the original alluvial soil and sediment profile on the site has been truncated (which will have removed any cultural materials this may have contained).

Criterion (f) – an item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history

The subsurface sediment profiles below the 2A Gregory Place site may contain archaeological materials and environmental evidence that is uncommon and may provide information that documents aspects of NSW's cultural and natural history that is not available from any other source.

Criterion (g) – an item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places.

The site may contain natural and cultural (archaeological) deposits that may potentially be of significance under this criterion by their ability to further demonstrate the principal characteristics of a class of NSW's cultural and natural places (i.e. long-term Aboriginal use of the Parramatta River valley).

7.4 Evaluation

The 2A Gregory Place site is located on the backplain of the Parramatta River within a potentially sensitive archaeological landform context on Clay Cliff Creek. Sealed beneath the existing factory buildings there is an alluvial sedimentary profile that may contain Aboriginal objects and archaeological deposit with cultural and scientific significance.

8.0 Archaeological impact assessment

8.1 Subsurface impact of the development

The proposal will require demolition of all existing buildings on the site and bulk excavation for the new buildings. The design level for the top of the excavation is 6.0mRL and the base excavation level is at -2.00mRL. Excavation will impact intact subsurface alluvial silty clays that occur below approximately 1.5m of disturbed fill material.⁶¹ Subsurface deposits below the depths of disturbance associated with the factory may contain Aboriginal objects.

8.2 Aboriginal archaeological management constraints

Archaeological test excavation to establish whether Aboriginal objects are present at the site is not practicable or appropriate at this time because of a combination of constraints that presently exist. There is potential for soils and sediments at the site to be contaminated and asbestos was found present at a number of sampled locations and there is also potential for acid sulphate soils. The contamination study recommends remediation of impacted fill materials for asbestos and carcinogenic PAHs and additional sampling for the offices/laboratory areas and former chemical store.⁶²

There is also a need for approval to demolish buildings and remove large amounts of potentially contaminated fills to reach depths required (at least 1.5m) to archaeologically test in situ deposits that may contain Aboriginal objects. The archaeological investigation strategy that is developed for the site needs to be first informed by the results of future contamination assessment and will require support from the project RAPs.

The site will likely require remediation of impacted fill that is present in locations beneath the factory and this constraint has been discussed with the project RAPs and development of an archaeological investigation strategy and impact mitigation measures will be informed by the findings of future contamination assessment and designed in consultation with the project Aboriginal groups.

8.3 Next steps in the Aboriginal heritage management for the site

The next steps we propose to undertake in the Aboriginal cultural heritage management process for the @A Gregory Place site are to provide the findings of future contamination assessment to the project RAPs when this information is available and invite feedback and develop with them an archaeological investigation methodology for the site that is based on the results of contamination assessment and consideration of demolition planning.

⁶¹ Alliance Geotechnical Pty Ltd February 2022. Table 6 and Appendix C (bore-logs).

⁶² Sullivan Environmental Services. March 2022.

9.0 Management recommendations

9.1 Recommendations

We recommend that the following planning actions be implemented for the management of the potential Aboriginal archaeological resources at the 2A Gregory Place site:

- The project RAPs will be informed of the current planning status of the 2A Gregory Place site and will be provided with a copy of this updated assessment report.
- The findings and recommendations of future contamination assessment and building demolition planning for the 2A Gregory Place site be provided to the project RAPs.
- An archaeological research design and test excavation methodology for the 2A Gregory Place site will be developed in consultation with the projects RAPs that is based on the results of contamination assessment and consideration of demolition planning.

10.0 References

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Attachments

Attachment A

Planning Secretary's Environmental Assessment Requirements (SSD-31179510)

Attachment B

Aboriginal community engagement and consultation

Attachment C

statutory heritage context and controls

Attachment A

Planning Secretary's Environmental Assessment Requirements (SSD-31179510)

Planning Secretary's Environmental Assessment Requirements

Build-to-rent housing



Development details

Application number	SSD-31179510
Project name	Gregory Place Build-to-Rent Concept Development
Description	Concept proposal for an affordable housing and build-to-rent development comprising approximately 483 dwellings within three freestanding four to eight storey buildings
Location	Lot 2 DP 802801 2A Gregory Place, Harris Park
Applicant	PACIFIC PLANNING PTY LIMITED
Date of Issue	28 April 2022

Content and guidance

Any Environmental Impact Statement (EIS) must meet the minimum form and content requirements as prescribed by Part 8 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and the *State Significant Development Guidelines*.

Relevant policies and guidelines can be found at <https://www.planningportal.nsw.gov.au/major-projects/assessment/policies-and-guidelines>.

Some issues, assessment requirements and documentation may not apply to all developments. Applicants should identify and respond to the requirements that are applicable to the proposed development. If an issue is not considered to apply, applicants should provide reasoning as to why

Key issues and documentation

Issue and Assessment Requirements	Documentation
<p>1. Statutory Context</p> <ul style="list-style-type: none"> Address all relevant legislation, environmental planning Instruments (EPIs) (including drafts), plans, policies and guidelines. Identify compliance with applicable development standards and provide a detailed justification for any non-compliances. If the development is only partly State significant development (SSD) declared under Chapter 2 of SEPP (Planning Systems) 2021, provide an explanation of how the remainder of the development is sufficiently related to the component that is SSD. 	<ul style="list-style-type: none"> Address in EIS
<p>2. Capital Investment Value and Employment</p>	<ul style="list-style-type: none"> Cost Summary Report

NSW Department of Planning and Environment | 1

Planning Secretary's Environmental Assessment Requirements

Build-to-rent housing



Issue and Assessment Requirements	Documentation
<ul style="list-style-type: none"> Provide a detailed calculation of the capital investment value (CIV) of the development, prepared by a qualified quantity surveyor. Provide an estimate of the retained and new jobs that would be created during the construction and operational phases of the development, including details of the methodology to determine the figures provided. 	
<p>3. Design Quality</p> <ul style="list-style-type: none"> Demonstrate how the development will achieve: <ul style="list-style-type: none"> design excellence in accordance with any applicable EPI provisions. good design in accordance with the seven objectives for good design in <i>Better Placed</i>. Demonstrate that the development has been reviewed by the State Design Review Panel (SDRP). Recommendations are to be addressed prior to lodgement. Detail the measures to ensure design integrity is maintained in subsequent stages of the planning process (such as post approval and any modifications). 	<ul style="list-style-type: none"> Design Review Summary (where the project has been reviewed by the SDRP)
<p>4. Built Form and Urban Design</p> <ul style="list-style-type: none"> Explain and illustrate the proposed built form, including a detailed site and context analysis to justify the proposed site planning and design approach. Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and responds to the context, site characteristics, streetscape and existing and future character of the locality. Specifically, explain how the proposed building heights are justified given the site context, existing controls and overall design. Demonstrate how the building design will deliver a high-quality development, including consideration of facade design, articulation, activation, roof design, materials, finishes, colours, any signage and integration of services. Assess how the development complies with the relevant accessibility requirements. 	<ul style="list-style-type: none"> Architectural drawings Design Report Survey Plan Building Code of Australia Compliance Report Accessibility Report
<p>5. Environmental Amenity</p> <ul style="list-style-type: none"> Address how good internal and external environmental amenity is achieved, including access to natural daylight and ventilation, pedestrian movement throughout the site, access to landscape and outdoor spaces. Provide details on internal wayfinding, pedestrian access and pathway connections. Assess amenity impacts on the surrounding locality, including lighting impacts, reflectivity, solar access, visual privacy, visual amenity, view loss and view sharing, overshadowing and wind impacts. A high level of 	<ul style="list-style-type: none"> Shadow Diagrams SEPP 65 Verification Statement SEPP 65 Assessment View Analysis

Planning Secretary’s Environmental Assessment Requirements

Build-to-rent housing



Issue and Assessment Requirements	Documentation
<p>environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated.</p> <ul style="list-style-type: none"> Provide a draft/concept solar access analysis of the overshadowing impacts of the development within the site, on surrounding properties and public spaces (during summer and winter solstice and spring and autumn equinox) at hourly intervals between 9am and 3pm, when compared to the existing situation and a compliant development (if relevant). 	
<p>6. Visual Impact</p> <ul style="list-style-type: none"> Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development with respect to existing views from the street, nearby reserves and heritage items. Where the visual analysis has identified potential for significant visual impact, provide a visual impact assessment that addresses the impacts of the development on the existing catchment. 	<ul style="list-style-type: none"> Visual Analysis Visual Impact Assessment
<p>7. Public Space</p> <ul style="list-style-type: none"> Demonstrate how the development maximises the amount, access to and quality of public spaces (including open space, public facilities and streets/plazas within and surrounding the site), reflecting relevant design guidelines and advice from the local council and the Department. Demonstrate how the development: <ul style="list-style-type: none"> ensures that public space is welcoming, attractive and accessible for all. maximises permeability and connectivity. maximises the amenity of public spaces in line with their intended use, such as through adequate facilities, solar access, shade and wind protection. maximises street activation. minimises potential vehicle, bicycle and pedestrian conflicts. Address how Crime Prevention through Environmental Design (CPTED) principles are to be integrated into the development, in accordance with <i>Crime Prevention and the Assessment of Development Applications Guidelines</i>. 	<ul style="list-style-type: none"> Public Space Plan (as part of the Design Report) CPTED Report
<p>8. Trees and Landscaping</p> <ul style="list-style-type: none"> Assess the number, location, condition, and significance of trees to be removed and retained and note any existing canopy coverage to be retained on-site. Provide a concept site-wide landscape plan that details indicative site planting and: <ul style="list-style-type: none"> provides evidence that opportunities to retain significant trees have been explored and/or informs the plan. 	<ul style="list-style-type: none"> Arboricultural Impact Assessment Landscape Plan

Planning Secretary’s Environmental Assessment Requirements

Build-to-rent housing



Issue and Assessment Requirements	Documentation
<ul style="list-style-type: none"> ○ demonstrates how the proposed development would: <ul style="list-style-type: none"> ▪ contribute to long term landscape setting in respect of the site and streetscape. ▪ mitigate the urban heat island effect and ensure appropriate comfort levels on-site. ▪ contribute to an increase in urban tree canopy cover. ▪ maximise opportunities for green infrastructure, consistent with Greener Places. 	
<p>9. Ecologically Sustainable Development (ESD)</p> <ul style="list-style-type: none"> • Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development. • Demonstrate how the development will meet or exceed the relevant industry recognised building sustainability and environmental performance standards. • Demonstrate how the development minimises greenhouse gas emissions (reflecting the Government’s goal of net zero emissions by 2050) and consumption of energy, water (including water sensitive urban design) and material resources. 	<ul style="list-style-type: none"> • Draft/Concept ESD Report
<p>10. Traffic, Transport and Accessibility</p> <ul style="list-style-type: none"> • Provide a transport and accessibility impact assessment, which includes: <ul style="list-style-type: none"> ○ an analysis of the existing transport network, including the road hierarchy and any pedestrian, bicycle or public transport infrastructure, current daily and peak hour vehicle movements, and existing performance levels of nearby intersections. ○ details of the proposed development, including pedestrian and vehicular access arrangements (including swept path analysis of the largest vehicle and height clearances), parking arrangements and rates (including bicycle and end-of-trip facilities), drop-off/pick-up-zone(s) and bus bays (if applicable), and provisions for servicing and loading/unloading. ○ analysis of the impacts of the proposed development (including justification for the methodology used), including predicted modal split, a forecast of additional daily and peak hour multimodal network flows as a result of the development (using industry standard modelling), identification of potential traffic impacts on road capacity, intersection performance and road safety (including pedestrian and cyclist conflict) and any cumulative impact from surrounding approved developments. ○ measures to mitigate any traffic impacts, including details of any new or upgraded infrastructure to achieve acceptable performance and safety, and the timing, viability and mechanisms of delivery (including 	<ul style="list-style-type: none"> • Transport and Accessibility Impact Assessment • Draft Construction Traffic Management Plan • Draft Green Travel Plan or equivalent

Planning Secretary’s Environmental Assessment Requirements



Build-to-rent housing

Issue and Assessment Requirements	Documentation
<p>proposed arrangements with local councils or government agencies) of any infrastructure improvements in accordance with relevant standards.</p> <ul style="list-style-type: none"> ○ proposals to promote sustainable travel choices for employees, residents, guests and visitors, such as connections into existing walking and cycling networks, minimising car parking provision, encouraging car share and public transport, providing adequate bicycle parking and high quality end-of-trip facilities, and implementing a Green Travel Plan. • Provide a draft Construction Traffic Management Plan detailing predicted construction vehicle movements, routes, access and parking arrangements, coordination with other construction occurring in the area, and how impacts on existing traffic, pedestrian and bicycle networks would be managed and mitigated. 	
<p>11. Biodiversity</p> <ul style="list-style-type: none"> • Assess any biodiversity impacts associated with the development in accordance with the <i>Biodiversity Conservation Act 2010</i> and the <i>Biodiversity Assessment Method 2020</i>, including the preparation of a Biodiversity Development Assessment Report (BDAR), unless a waiver is granted, or the site is on biodiversity certified land. • If the development is on biodiversity certified land, provide information to identify the site (using associated mapping) and demonstrate the proposed development is consistent with the relevant biodiversity measure conferred by the biodiversity certification. 	<ul style="list-style-type: none"> • Biodiversity Development Assessment Report or BDAR Waiver
<p>12. Noise and Vibration</p> <ul style="list-style-type: none"> • Provide certification from an acoustic engineer that the development could achieve compliance with the relevant NSW Environment Protection Authority (EPA) guidelines. 	<ul style="list-style-type: none"> • Noise and Vibration Impact certification
<p>13. Ground and Water Conditions</p> <ul style="list-style-type: none"> • Provide an assessment of the potential impacts on soil resources, including related infrastructure and riparian lands on and near the site. • Provide an assessment of the potential impacts on surface and groundwater resources (quality and quantity), including related infrastructure, hydrology, aquatic and groundwater dependent ecosystems, drainage lines, downstream assets and watercourses. • Provide an assessment of salinity and acid sulfate soil impacts. 	<ul style="list-style-type: none"> • Geotechnical Assessment • Surface and Groundwater Impact Assessment • Salinity Management Plan and/or Acid Sulfate Soils Management Plan

Planning Secretary's Environmental Assessment Requirements

Build-to-rent housing



Issue and Assessment Requirements	Documentation
<p>14. Stormwater and Wastewater</p> <ul style="list-style-type: none"> Provide an Integrated Water Management Plan for the development that: <ul style="list-style-type: none"> is prepared in consultation with the local council and any other relevant drainage or water authority. details the proposed drainage design for the site including any on-site treatment, reuse and detention facilities, water quality management measures and the nominated discharge points. demonstrates compliance with the local council or other drainage or water authority requirements and avoids adverse impacts on any downstream properties. Where drainage infrastructure works are required that would be handed over to the local council, or other drainage or water authority, provide full hydraulic details and detailed plans and specification of proposed works that have been prepared in consultation with, and comply with the relevant standards of, the local council or other drainage or water authority. 	<ul style="list-style-type: none"> Integrated Water Management Plan
<p>15. Flooding Risk</p> <ul style="list-style-type: none"> Identify any flood risk on-site having regard to adopted flood studies, the potential effects of climate change, and any relevant provisions of the <i>NSW Floodplain Development Manual</i>. Assess the impacts of the development, including any changes to flood risk on-site or off-site, and detail design solutions and operational procedures to mitigate flood risk where required. 	<ul style="list-style-type: none"> Flood Risk Assessment
<p>16. Contamination and Remediation</p> <ul style="list-style-type: none"> In accordance with Chapter 4 of SEPP (Resilience and Hazards) 2021, assess and quantify any soil and groundwater contamination and demonstrate that the site is suitable (or will be suitable, after remediation) for the development. 	<ul style="list-style-type: none"> Preliminary Site Investigation
<p>17. Waste Management</p> <ul style="list-style-type: none"> Provide the measures to be implemented to manage, reuse, recycle and safely dispose of this waste. Identify appropriate servicing arrangements for the site. If buildings are proposed to be demolished or altered, provide a hazardous materials survey. 	<ul style="list-style-type: none"> Hazardous Material Survey
<p>18. Aboriginal Cultural Heritage</p> <ul style="list-style-type: none"> Provide an Aboriginal Cultural Heritage Assessment Report prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts for any Aboriginal cultural heritage values on the site. 	<ul style="list-style-type: none"> Aboriginal Cultural Heritage Assessment Report

Planning Secretary’s Environmental Assessment Requirements

Build-to-rent housing



Issue and Assessment Requirements	Documentation
<p>19. Environmental Heritage</p> <ul style="list-style-type: none"> • Provide a Statement of Heritage Impact (SOHI) prepared by a suitably qualified heritage consultant in accordance with the guidelines in the NSW Heritage Manual and the following: <ul style="list-style-type: none"> ○ all heritage items (state and local) within the vicinity of the site including built heritage, landscapes and archaeology, detailed mapping of these items, and assessment of why the items and site(s) are of heritage significance; ○ compliance with the relevant Conservation Management Plan; ○ compliance with the advice and recommendations provided by the Heritage Council Approvals Committee (HCAC) at its meeting on 2 March 2021; ○ the Impacts of the proposal on heritage item(s) including a visual impact assessment; ○ the attempts to avoid and/or mitigate the impact on the heritage significance or cultural heritage values of the site and the surrounding heritage items; and ○ justification for any changes impacting on the heritage significance or cultural heritage values of the site and the surrounding heritage items including any options analysis. • If the SOHI identifies impact on potential historical and/or maritime archaeology, an historical and/or maritime archaeological assessment should be prepared by a suitably qualified archaeologist in accordance with the guidelines <i>Archaeological Assessment</i> (1996) and <i>Assessing Significance for Historical Archaeological Sites and Relics</i> (2009). • Archaeological Assessment (if potential impacts to archaeological resources are identified), prepared in accordance with the relevant guidelines, which assesses any impacts and outlines measures to ensure they are minimised and mitigated. 	<ul style="list-style-type: none"> • Statement of Heritage Impact • Archaeological Assessment
<p>20. Social Impact</p> <ul style="list-style-type: none"> • Provide a Social Impact Assessment (SIA) prepared in accordance with the <i>Social Impact Assessment Guidelines for State Significant Projects</i>. Where possible, the SIA should also discuss the following: <ul style="list-style-type: none"> ○ The physical distribution of the affordable dwellings with the market (BTR) dwellings on the site ○ The distribution and type of common areas with consideration to the social locality ○ Common pedestrian connections ○ Short and long term impacts on the surrounding locality 	<ul style="list-style-type: none"> • Social Impact Assessment
<p>21. Infrastructure Requirements and Utilities</p> <ul style="list-style-type: none"> • In consultation with relevant service providers: 	<ul style="list-style-type: none"> • Infrastructure Delivery, Management and Staging Plan

Planning Secretary’s Environmental Assessment Requirements



Build-to-rent housing

Issue and Assessment Requirements	Documentation
<ul style="list-style-type: none"> ○ assess the Impacts of the development on existing utility infrastructure and service provider assets surrounding the site. ○ Identify any infrastructure upgrades required on-site and off-site to facilitate the development and any arrangements to ensure that the upgrades will be implemented on time and be maintained. 	
<p>22. Construction, Operation and Staging</p> <ul style="list-style-type: none"> • If staging is proposed, provide details of how construction and operation would be managed and any impacts mitigated. 	<ul style="list-style-type: none"> • Address in EIS
<p>23. Contributions and Public Benefit</p> <ul style="list-style-type: none"> • Address the requirements of any relevant contribution plan(s), planning agreement or EPI requiring a monetary contribution, dedication of land and/or works-in-kind and include details of any proposal for further material public benefit. • Where the development proposes alternative public benefits or a departure from an existing contributions framework, the local council, the Department and relevant State agencies are to be consulted prior to lodgement and details, including how comments have been addressed, are to be provided. • Demonstrate a contribution to public benefit which is commensurate with the scale of the development. 	<ul style="list-style-type: none"> • Address in EIS
<p>24. Engagement</p> <ul style="list-style-type: none"> • Detail engagement undertaken and demonstrate how it was consistent with the <i>Undertaking Engagement Guidelines for State Significant Projects</i>. Detail how issues raised and feedback provided have been considered and responded to in the project. In particular, applicants must consult with: <ul style="list-style-type: none"> ○ the relevant Department assessment team. ○ any relevant local councils. ○ any relevant agencies (including the Western Parkland City Authority for development within the Western Parkland City). ○ the community. ○ If the development would have required an approval or authorisation under another Act but for the application of s 4.41 of the EP&A Act or requires an approval or authorisation under another Act to be applied consistently by s 4.42 of the EP&A Act, the agency relevant to that approval or authorisation. 	<ul style="list-style-type: none"> • Engagement Report

Attachment B

Aboriginal community engagement and consultation



Our reference: Doc22/323384

Dominic Steele
Dominic Steele Consulting Archaeology
21 Macgregor Street
Croydon NSW

21/04/2022

Dear Dominic,

WRITTEN NOTIFICATION OF PROPOSAL AS REQUIRED UNDER DECCW ABORIGINAL CULTURAL HERITAGE CONSULTATION REQUIREMENTS FOR PROPONENTS 2010

Subject: 2A Gregory Place, Harris Park, NSW.

Thank you for your correspondence dated 23 April 2022 to Heritage NSW (Department of Premier and Cabinet) regarding the above project.

Attached is a list of known Aboriginal parties for the proposed development at Parramatta local Government Area that Heritage NSW considers likely to have an interest in the activity.

Please note this list is not necessarily an exhaustive list of all interested Aboriginal parties.

Receipt of this list does not remove the requirement of a proponent/ consultant to advertise in local print media and contact other bodies seeking interested Aboriginal parties, in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (April 2010).

Under Section 4.1.6. of the Consultation Requirements, you must also provide a copy of the names of each Aboriginal person who registered an interest to the relevant Heritage NSW office and Local Aboriginal Land Council (LALC) within 28 days from the closing date for registering an interest.

Please note that the contact details in the list provided by Heritage NSW may be out of date as it relies on Aboriginal parties advising Heritage NSW when their details need changing. If individuals/companies undertaking consultation are aware that any groups contact details are out of date, or letters are returned unopened, please contact either the relevant stakeholder group (if you know their more current details) and/or Heritage NSW. AHIP applicants should make a note of any group they are unable to contact as part of their consultation record.

Level 6, 10 Valentine Ave Parramatta NSW 2150 ■ Locked Bag 5020 Parramatta NSW 2124
P: 02 9873 8500 ■ E: heritagemailbox@environment.nsw.gov.au

If you have any questions about this advice, please email:
heritagemailbox@environment.nsw.gov.au or contact (02) 9873 8500.

Yours sincerely



Barry Gunther
Aboriginal Heritage Planner
Aboriginal Heritage Regulation Branch – South Heritage NSW

Attachment A: Registered Aboriginal Interests DPC RAP List for the at Parramatta Local Government Area.

LIST OF ABORIGINAL STAKEHOLDERS FOR THE DEPARTMENT of PREMIER and CABINET (DPC) SOUTHERN REGION HELD BY DPC FOR THE PURPOSES OF THE OEH ABORIGINAL CULTURAL HERITAGE CONSULTATION REQUIREMENTS FOR PROPONENTS 2010

These lists are provided to proponents in accordance with section 4.1.2 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (the "Consultation Requirements") which commenced on 12 April 2010.

The consultation process involves getting the views of, and information from, Aboriginal people and reporting on these. It is not to be confused with other field assessment processes involved in preparing a proposal and an application. Consultation does not include the employment of Aboriginal people to assist in field assessment and/or site monitoring. Aboriginal people may provide services to proponents through a contractual arrangement however, this is separate from consultation. The proponent is not obliged to employ those Aboriginal people registered for consultation. Consultation as per these requirements will continue irrespective of potential or actual employment opportunities for Aboriginal people.

A copy of the Consultation Requirements can be found on the OEH website at:
<http://www.environment.nsw.gov.au/resources/cultureheritage/commconsultation/09781ACHconsultreq.pdf>

Under the Consultation Requirements; a proponent is required to provide Aboriginal people who may hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places as relevant to the proposed project area, with an opportunity to be involved in consultation. Section 3.3.1 of the Consultation Requirements states that Aboriginal people who can provide this information are, based on Aboriginal lore and custom, the traditional owners or custodians of the land that is the subject of the proposed project.

The Consultation Requirements also state that:

Traditional owners or custodians with appropriate cultural heritage knowledge to inform decision making who seek to register their interest as an Aboriginal party are those people who:

- *continue to maintain a deep respect for their ancestral belief system, traditional lore and custom*
- *recognise their responsibilities and obligations to protect and conserve their culture and heritage and care for their traditional lands or Country*
- *have the trust of their community, knowledge and understanding of their culture, and permission to speak about it.*

Please note: the placement of an organisation's name on any OEH Aboriginal stakeholder list for the Consultation Requirements does not override a proponent's requirement to also advertise in the local newspaper and to seek from other sources the names of any other Aboriginal people who may hold cultural knowledge as required under clause 60 of the National Parks and Wildlife Regulation 2019.

How to use this list

1. Contact the organisations/individuals who have indicated an interest in the relevant LGA/s and invite them to register an interest in your project

Do not reproduce the attached list in publicly available reports and other documents. Your report should only contain the names of the organisations and individuals who you have invited to register an interest in your project and those who have registered as stakeholders for your project.

Last updated 12 April 2022

Engagement

Following the identification and establishment of the Registered Aboriginal Parties for the project, and prior to convening an on-site meeting with these Aboriginal community groups and individuals, the Proponent provided the Project RAP's with information about the proposed redevelopment. This included concepts for the future built form and communal open-spaces, landscape design and planting character concepts, and an environmental strategy for the site and its interface with Clay Cliff Creek.

Consultation meeting and outcomes

An on-site meeting with the Project RAP's to discuss the redevelopment project and start the dialogue about the Aboriginal cultural heritage values of the place was held on 12 May 2022.

2A Gregory Place project information-sharing meeting – Aboriginal community group attendees and apologies

<u>Organization</u>	<u>Apologies</u>
<u>Deerubbin Local Aboriginal Land Council</u>	
<u>Darug Custodian Aboriginal Corporation</u>	
<u>A1 Indigenous Services</u>	
<u>Amanda Hickey Cultural Services</u>	
<u>Didge Ngunawal Clan</u>	
<u>Corroboree Aboriginal Corporation</u>	
<u>Ginninderra Aboriginal Corporation</u>	
<u>Kamilaroi Yankuntjatjara Working Group</u>	
<u>Murra Bidgee Mullangari Aboriginal Corporation</u>	
<u>Widescope Aboriginal Corporation</u>	
<u>Woka Aboriginal Corporation</u>	
	Muragadi Indigenous Corp

This meeting gave the Proponent an opportunity to meet the community and to present to them the vision for the project and for the project team to overview their respective roles and to invite discussion around design and operational elements of the project.

2A Gregory Place on-site Aboriginal community consultation meeting – May 2022



Following the meeting, the project team compiled the notes summarised below into themes to capture conversations that were held during the discussions. These were provided to each of the Project RAP's following the meeting:

- Housing affordability
- Project governance
- Economic development opportunities
- Design opportunities
- Caring for Country
- Cultural landscape and archaeology

Housing affordability

- Consensus on the importance of providing affordable housing for Aboriginal residents.
- Agreement that housing supply that caters for single man and women, and young families, and older generations on fixed incomes is an important initiative of the proposed redevelopment.
- Commitment sought for Proponent to enable development to provide percentage of affordable housing for Aboriginal people, to continue to work with Deerubbin Local Aboriginal Land Council on issue and consider partnerships with Aboriginal housing providers.

Project governance

- RAP's asked how best to ensure Aboriginal community input occurs across the project life cycle. Proponent confirmed decision making will occur at several points, including determination of housing mix as well as design decisions, use of Aboriginal Language, and cultural interpretation.
- Proponent to establish project task group that includes Aboriginal community representatives with decision-making capacity, and to resource group appropriately with administration support and with remuneration.

Economic development opportunities

- The project life cycle includes concept design, future construction and delivery, and ongoing care and maintenance and the RAP's expressed interest in training and employment opportunities that may be available to Aboriginal enterprises.

Design opportunities

- Develop a framework for inclusion of public art in design, landscape with planting to connect back with Country, and embed and tell cultural history and heritage stories within development.

Caring for Country

- When buildings are constructed, opportunities for ongoing care and maintenance of development by Aboriginal people be explored to facilitate access and care to Country.

Cultural landscape and archaeology

- RAP's noted site covered by buildings with no natural ground exposed, and unresolved contamination issues needed to be addressed.
- RAP's expressed consensus view that there was potential for proposal to impact Aboriginal objects protected by the NPW Act, and site should be test excavated.
- The Aboriginal history and heritage of the land should be acknowledged and respected.
- Aboriginal community request to be shown how the future open space within the development is to be designed and will appear when constructed.
- There should be opportunities in the new development to tell Aboriginal stories pertinent to the local area, and opportunities for the use of Aboriginal art in storytelling.

ACHAR review and outcomes

A draft of this report was provided to each of the Aboriginal community groups and individuals for review and comment prior to finalization. The table below summarizes the key cultural advice and recommendations that have been shared by the Project RAP's and the correspondence that has been received for this report is appended along with a schedule of the Aboriginal community stakeholder consultation that has been completed while preparing this ACHAR.

Aboriginal community advice and recommendations

Aboriginal community group	Aboriginal cultural heritage values and advice
Corroboree Aboriginal Corporation	Corroboree Aboriginal Corporation believe soils under factory may contain Aboriginal artefacts and should be archaeologically tested. Develop with Project Raps test excavation methodology. Integration of Aboriginal recognition and interpretation into future design to acknowledge and respect our heritage.

	<p>Explore opportunities in new development to display Aboriginal art with Aboriginal stories relevant to local area.</p> <p>Corroboree Aboriginal Corporation support ACHAR and its cultural heritage management recommendations.</p>
Darug Custodian Aboriginal Corporation	<p>Darug Custodian Aboriginal Corporation advise many researchers present Aboriginal history from colonial perspective and/or solely from archaeological evidence. These histories lack peoples stories and parts of important events and connections of Darug and other peoples that now call this area home.</p> <p>Parramatta is significant to Darug people because of evidence of continued occupation shown by significant archaeological sites in proximity.</p> <p>Landscapes and landforms are significant to Darug people because they hold information about how Aboriginal people's movement through country.</p> <p>Darug sites are all connected and hold knowledge about or heritage and past history. Many of our sites are thousands of years old but many have also been destroyed by historical land use since colonisation.</p> <p>Parramatta/Harris Park and surrounding areas are significant to Darug people, and by doing testing and salvage archaeological investigation, we get filling of gaps in knowledge about our past.</p> <p>Darug Custodian Aboriginal Corporation agree with the recommendations set out in the ACHAR.</p>
Deerubbin Local Aboriginal Land Council	<p>Deerubbin Local Aboriginal Land Council agrees and supports the ACHAR and recommendations for test excavation following resolution of contamination issues and demolition plans.</p>
Didge Ngunawal Aboriginal Clan	<p>Didge Ngunawal Aboriginal Clan support the ACHAR and for testing below factory with method developed with RAPS.</p>
Ginninderra Aboriginal Corporation	<p>Parramatta area has rich Aboriginal history and many culturally significant places; our history and heritage should be acknowledged and respected. Protection and preservation of cultural heritage of great value to whole community and education and awareness key step towards reconciliation.</p> <p>Ginninderra Aboriginal Corporation support ACHAR and recommendations.</p> <p>Recommend restoration of habitat and planting after development.</p> <p>Acknowledge this is Aboriginal land.</p> <p>Tell stories of the area as a culturally important place and use Aboriginal art and Language in storytelling.</p> <p>Ensure Aboriginal people are involved in the decision making and their input is valued throughout project.</p>
Kamilaroi Yankuntjatjara Working Group	<p>Tangible, intangible, and aesthetic aspects of culture need to be considered when assessing land. By acknowledging Aboriginal stories of land, we continue our connection to country through passing on knowledge.</p> <p>Water ways play big part in cultural history and we have lost many due to European land use. Parramatta River - where fresh water meets salt water, is resource rich environment and nearby swampy wetlands used by Aboriginal peoples for food, medicine, and drinking water.</p> <p>Flora and fauna would have been thriving and Aboriginal people strategically look after land and plants and animals in a way that coexisted with the environment around them.</p> <p>Consider Aboriginal cultural practices to care for country, fire management a well-known tool to manage landscape, create ecosystems. Aboriginal people have knowledge of land and how ecosystems work.</p> <p>Our modern history - has affected Aboriginal people dramatically (and we are thriving despite this). Aboriginal cultural groups come from all over NSW, as Aboriginal people</p>

	<p>were moved due to stolen generation. Stolen generation at Parramatta was first where Aboriginal children away from families and placed in native institute and female factory to be raised like white people of time and is significant to our history of Parramatta.</p> <p>We recommend a cultural interpretation plan for project to educate community and continue passing down knowledge to younger generations achieved by native landscaping, edible gardens, art, digital displays, sound scape, water features.</p> <p>Kamilaroi Yankuntjatjara Working Group support ACHAR and recommendations.</p>
Muragadi Indigenous Heritage Corporation	Muragadi Indigenous Heritage Corporation support ACHAR and recommendations for test excavation method to be developed with community to investigate and identify if Aboriginal objects are present.
Murrabidgee Mallangari Aboriginal Corporation	Murrabidgee Mallangari Aboriginal Corporation support ACHAR and recommendations.
Tocomwall	Tocomwall has taken the position with all projects that they do not support reports or methodologies that have not been involved them in field assessment
Woka Aboriginal Corporation	<p>Woka Aboriginal Corporation recommend following demolition of structures Aboriginal artefacts may be present in underlying soils and archaeological test investigation is recommended to ascertain this.</p> <p>Request for findings of future contamination assessments and demolition planning to be provided to Project RAPs for feedback.</p> <p>Development with Project Raps an archaeological research design and test excavation methodology based on results of contamination assessment.</p> <p>Woka Aboriginal Corporation support ACHAR and approach for testing method to be developed with RAPs.</p>

2A Gregory Place Aboriginal Community Consultation Schedule

Consultation Stage	Notifications, Expressions of interest & Consultation
Stage 1: Notification & Registration of Expressions of Interest	
Public Notice	<p>Public notice in Koori Mail</p> <p>No expressions of interest received from advert</p>
Agency Notifications	<p>Department of Premier and Cabinet (Heritage NSW)</p> <p>Office of the Registrar, Aboriginal Land Rights Act 1983</p> <p>National Native Title Tribunal</p> <p>Native Title Services Corp</p> <p>Parramatta Council Aboriginal Advisory Committee</p> <p>Holroyd City Council Advisory Committee</p>

	<p>Deerubbin Local Aboriginal Land Council</p> <p>Gandangara Local Aboriginal Land Council</p> <p>Metropolitan Local Aboriginal Land Council</p>
<p>Aboriginal Community Notifications (HNSW Stakeholder List)</p> <p><i>Sixty-four Aboriginal groups/individuals on HNSW list notified of project & invited to participate in consultation and preparation of 2A Gregory Place ACHAR</i></p>	<p>Deerubbin Local Aboriginal Land Council</p> <p>Darug Custodian Aboriginal Corporation</p> <p>A1 Indigenous Services</p> <p>Amanda Hickey Cultural Services</p> <p>B N Heritage Consultants</p> <p>Corroboree Aboriginal Corporation</p> <p>Didge Ngunawal Clan</p> <p>Clive Freeman</p> <p>Ginninderra Aboriginal Corporation</p> <p>Gunya Aboriginal Cultural Heritage Services Pty Ltd</p> <p>Kamilaroi Yankuntjatjara Working Group</p> <p>Mundawari</p> <p>Muragadi Heritage Indigenous Corporation</p> <p>Murra Bidgee Mullangari Aboriginal Corporation</p> <p>Thoorga Nura</p> <p>Tocomwall</p> <p>Waawaa Awaab Aboriginal Corporation</p> <p>Woka Aboriginal Corporation</p> <p>Widescope Aboriginal Corporation</p>
<p>Stage 2: Presentation of Project</p> <p>On-site meeting 12 May 2022</p>	<p>Deerubbin Local Aboriginal Land Council</p> <p>Darug Custodian Aboriginal Corporation</p> <p>A1 Indigenous Services</p> <p>Amanda Hickey Cultural Services</p> <p>Corroboree Aboriginal Corporation</p> <p>Didge Ngunawal Clan</p> <p>Ginninderra Aboriginal Corporation</p> <p>Kamilaroi Yankuntjatjara Working Group</p> <p>Murra Bidgee Mullangari Aboriginal Corporation</p> <p>Woka Aboriginal Corporation</p> <p>Widescope Aboriginal Corporation</p> <p>Muragadi Heritage Indigenous Corp (apologies)</p>
<p>Stage 3: Gathering & Sharing Information on Cultural Significance and Management</p>	<p>Distribution of meeting outcomes and draft historical and archaeological research findings</p>
<p>Stage 4: Review of Draft ACHAR and Proposed Management</p> <p>Final Draft ACHAR to RAPs for review and comment</p>	<p>ACHAR reviewed and Aboriginal community group cultural heritage statements attached</p>



**CORROBOREE ABORIGINAL
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ICN 810

CORROBOREE ABORIGINAL CORPORATION PRESERVING CULTURE AND HERITAGE

7 June 2022

Statement: 2A Gregory Place, Harris Park

We submit our recommendations and appreciate that Aboriginal consultation is included in the early stages of this project; at 2A Gregory Place, Harris Park. CAC recommends that upon demolition of the existing infrastructures there be soil testing as the soils under the factories concrete floor could likely hold Aboriginal artefacts, as such CAC would request that the site be excavated for such objects that may be under the existing buildings. We second Dom Steele – Archeologists, recommendations that site will also require remediation of impacted fill materials that have been identified to be present in locations beneath the factory and there is also a need for additional environmental assessment sampling and analysis at a number of locations to guide and enable the development.

We at CAC value the inclusion of being participants in early stages of the process, that is being undertaken with our Aboriginal community involvement, to develop this land. We appreciate our involvement in the Aboriginal Cultural Heritage assessment for this site. We hope to find further acknowledgment of our Ancestors history. We note that due to our experience working in the area, we believe the area to have the high possibility of subsurface profiles within the study area. We feel 2A Gregory Place will contain archaeological materials and environmental evidence that is uncommon and shall provide information to provide aspects of NSW's cultural and natural history. This is significant to display the principal characteristics of a class of NSW's cultural or natural places, or cultural or natural environments. Thereby this site could contain natural and cultural deposits that may potentially be of significance under this criterion by their ability to further demonstrate the principal characteristics of a class of NSW's cultural and natural places (ie. long-term Aboriginal use of the Parramatta River valley). Projects location 2A Gregory Place is on the edge of the PSB which makes this area a potentially sensitive archaeological landform context on Clay Cliff Creek. Sealed beneath the existing factory buildings and hard-surfaces covering the site there is an alluvial sedimentary profile that may contain Aboriginal objects and archaeological deposit with cultural and scientific value. However, the upper parts of the subsurface sedimentary sequence have been widely and in parts deeply disturbed.



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We at Corroboree Aboriginal Corporation believe the subsurface soil profiles within the site have the potential to contain Aboriginal objects; as such would request further investigation and assessment. We know from our many years of working in the area that it has always been the case, in regard to the discovery of Aboriginal objects in this area. We therefore agree with Archeologists Dom Steele that the site has archaeological potential and once demolished we would appreciate being involved in testing..

As we feel certain there are artefacts in this project area there's is a risk that the proposed redevelopment will impact on Aboriginal Cultural Heritage which is protected by the NPW Act, thereby there should be further investigations soil testing, etc.

We hope also that integration of Aboriginal recognition, and interpretation into the future design and we agree with the recommendations.

As Aboriginal stakeholders involved in ACHAR

1. Provide the findings of future contamination assessments and building demolition planning to the Project RAPs and invite feedback.
2. Develop with the Project Raps an archaeological research design and test excavation methodology for the site that is based on the results of contamination assessment and consideration of demolition planning.
3. Use the test excavation method developed with the community and supported by this ACHAR to accompany an application to HNSW for approval to test excavate the 2A Gregory Place site.

We agree with then recommendations

That's the Proponent invite the Project RAPS to assist in the development of an archaeological research design and test excavation methodology for the site based on the result of contamination assessment and consideration of demolition planning.

The Proponent use the test excavation methodology developed with the community and this ACHAR to support an application to HNSW for approval to test excavate the site to establish whether an Aboriginal Heritage Impact Permit (AHIP) is required under the National Parks and Wildlife Act 1974(NPW Act) for the proposal if it is determined that Aboriginal objects are present and likely harmed by the redevelopment.

We concur with all the recommendations by Archeologists Dom Steele regarding further investigations and see no issues with the project moving forward from a Aboriginal Cultural Heritage prospect. .

And further on in the project Aboriginal history and heritage of the project site we hope there to be displayed signage as an acknowledgement and of respect for the First Nations People on the site.



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ICN 810

We the Aboriginal Heritage Consultants, ask that we be part of the implementation of any future open space. We as Aboriginal people appreciate being consulted with our views on the development design and construction plans.

As previously discussed on former projects we hope there will be opportunities in the new development to display Aboriginal Art with the Aboriginal stories relevant to the local area to allow for art in the use of story telling of the First Nations People.

Sincerely

Marilyn Carroll-Johnson

DARUG CUSTODIAN 
ABORIGINAL CORPORATION

DARUG CUSTODIAN
ABORIGINAL
CORPORATION

PO BOX 81 WINDSOR 2756
PHONE: 0245775181 FAX: 0245775098
MOBILE: 0415770163 Leanne Watson
0414962766 Justine Coplin
EMAIL: mulgokiwi@bigpond.com / justinecoplin@optusnet.com.au

Attention: DSCA

Date: 9/06/22

Subject: 2A Gregory Place Harris Park

Dear Dom

Our group is a non- profit organisation that has been active for over forty years in Western Sydney, we are a Darug community group with over three hundred members. The main aim in our constitution is the care of Darug sites, places, wildlife and to promote our culture and provide education on the Darug history.

Our group promotes Darug Culture and works on numerous projects that are culturally based as a proud and diverse group. It has been discussed by our group and with many consultants and researches that our history is generic and is usually from an early colonists perspective or solely based on archaeology and sites. These histories are adequate but they lack the people's stories and parts of important events and connections of the Darug people and also other Aboriginal people that now call this area home and have done so for numerous generations.

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.

The Aboriginal cultural heritage consultation requirements for proponents Section 4.1.8 refers to "Aboriginal organisations representing Aboriginal people who hold cultural knowledge". Recent consultation meetings have revealed that many of these Aboriginal organisations and individuals do not hold cultural knowledge of the Western Sydney area. The increasing involvement of such parties in cultural heritage management means that genuine local Aboriginal organisations are unable to properly care for our cultural heritage.

Many Aboriginal organisations listed in the OEH response letter do not contribute to the Aboriginal community of Western Sydney. Individuals listed in the OEH response letter do not represent the community and while they may be consulted with, should not be employed for their own personal financial benefit.

Our organisation is committed to providing benefits back to our local Aboriginal community through such measures as funding the local Aboriginal juniors' touch football team, painting classes for the local children and donating money to various charities. Employment in cultural heritage activities is source of income that organisations such as ours can use to contribute to beneficial activities and support within the community.

Darug custodian Aboriginal Corporation's site officers have knowledge of Darug land, Darug Culture, Oral histories, landforms, sites, Darug history, wildlife, flora and legislative requirements. We have worked with consultants and developers for many years in Western

Sydney (Darug Land) for conservation, site works, developments and interpretation/education strategie.

Darug Custodian Aboriginal Corporation have received and reviewed the Information supplied

.

Parramatta / Harris Park and surrounding areas are so significant to the Darug People as the area has high cultural value and by doing testing and salvage , we get a broader understand of movement and filling in the gaps of our past.

We hope in the future all development reports and information can be mapped to show how Durag people lived in and around Parramatta.

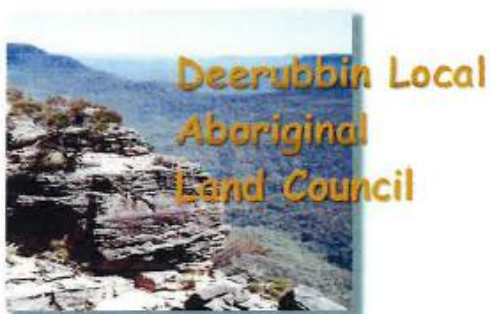
We support the recommendations set out by DSCA.

Please contact us with all further enquiries on the above contacts.

Regards



Justine Coplin



73 A , O'Connell Street
Main Gate, Cnr of Dunlop & New Street
(Former Correctional Centre)
North Parramatta NSW 1750

PO Box 2341, North Parramatta
NSW 1750 AUSTRALIA

ABN: 41 303 129 586
T: (02) 4724 5600
F: (02) 4722 9713
E: reception@deerubbin.org.au
W: <http://www.deerubbin.org.au>

Dominic Steele Consulting Archaeologist
21 MacGregor Street
CROYDON NSW 2132

Ref: 3367

15 June 2022

SUBJECT: PROTECTION OF ABORIGINAL CULTURAL HERITAGE

2a Gregory Place, Harris Park

Lot 2 in DP 807801

'Build to Rent' State Significant Development (SSD-31179510)

Attention: Dominic Steele

Deerubbin Local Aboriginal Land Council site committee has read and viewed the Aboriginal cultural heritage report for 2a Gregory Place, Harris Park. The Land Council agrees and supports recommendations and methodology for the demolition & testing excavations for the above mentioned location.

Yours Sincerely

Steven Randall
Senior Cultural Heritage Officer

6.6.22

REPORT FOR
2A GREGORY PLACE
HARRIS PARK.

 **Djirnganawal Clan**
33 Carlyle Crescent Cambridge Gardens
PAUL BOYD
Tel: 0426823944
Email: djirnganawalclan@yahoo.com.au
ABN: 83857193147

To Whom it may concern,

DNC believes that already has been acknowledged, that a test excavation should go ahead to see what lies beneath toward the sand. (Natural)

For what Dominic Steele has proposed sounds about right. DNC has always agreed to what he puts down on the table, and once again has done the right recommendations for this site @ Harris Park. (2a Gregory Place)

KIND REGARDS
PAUL BOYD & LILLY CARROLL
DIRECTORS DNC
0426823944





June 8th 2022

Dominic Steele
DCSA
21 Macgregor Street
CROYDON
NSW 2132

RE: 2A Gregory Place, Parramatta NSW

Dear Dominic,

Our Ginninderra Aboriginal Corporation members appreciate the opportunity to consult on this project.

The Parramatta area is very rich in Aboriginal history and full of culturally important places. As such we believe that the Aboriginal history and heritage of the land should be acknowledged and respected. We believe that the protection and preservation of as much cultural heritage as possible is of great value to both the Aboriginal and non-Aboriginal community looking towards the future; and education and awareness is key in the step towards reconciliation.

We have reviewed the draft cultural heritage assessment and agree with the recommendations outlined by DSCA.

Further to that, would like to add some recommendations for your consideration as the project continues. Particularly:

- Registered Aboriginal community members be involved in the test excavation.
- Proper clean-up of site throughout and after the development (especially as there are waterways nearby), and restoration of habitat (planting native plants/gardens to help local species).
- Acknowledge this is Aboriginal land (something as simple as an Acknowledgement of Country plaque in the foyer of the new building can make an impact).
- Tell the stories of the area as a culturally important place. There should be opportunities in the new development to tell Aboriginal stories pertinent to the local area, and opportunities for the use of Aboriginal art in story-telling. An example of this is the website set up after Thompson Square in Windsor was excavated for the new bridge. There are signs at the site containing information about the area, the local tribe, and photographs of the artefacts found. Each sign has a QR code that people can scan also making it interactive. I have added the link for your perusal and a couple of photographs to my email. Example: [Welcome to Darug Lands | Thompson Square](#)
- Language use within the new development (use and teaching of language and also signage).
- Ensure Aboriginal people are involved in the decision making and their input valued throughout the project.

We look forward to continued consultation on this project. Please don't hesitate to contact us should you require any further information.

Yours sincerely,

Krystle Carroll-Elliott
Ginninderra Aboriginal Corporation
E: ginninderra.corp@gmail.com

Re: 2a Gregory Place Harris Park

Dear Dom,

Thank you for you ACHA for 2A Gregory Place, Harris Park, NSW. Our people have managed the land and cared for it for tens of thousands of years and continue to do so. we have a deep connection with the land, water, and sky this connection guides us when walking the land, we are one with mother nature.

There are tangible, intangible, and aesthetic aspects that our culture depends on, we must take theses into account when doing an assessment of the land. By acknowledging stories and creation stories of the land we work on today and continuing the connection to country through interpretation and passing on this knowledge. We follow the water ways as a giver of life without them we are not here; over the last two hundred years we have lost many water ways due to the arrival of Europeans.

There are major water ways that play a big part in our cultural history of the land and how it was utilised. For instance, the Parramatta River would be utilised daily, for resources and fresh water source. Aquaculture would have been undertaken and other practices also such as agriculture to help maintain the environment. The study area is close to the Parramatta River this suggest that the area is has potential for Archaeological deposits. The Parramatta River were the fresh water meets the salt water, and area that is a resource rich environment. The study area is also close to a swampy wetland which can be utilised by Aboriginal Peoples for food, medicine, and a fresh water source. The area is also significant due to how long Aboriginal peoples occupied the land; we are connected to it.

The flora and fauna would have been thriving and Aboriginal people utilised their environment to its full potential. Aboriginal people carried out their daily activities in this area, hence why it's so important to us. Aboriginal people have walked this land for tens of thousands of years and continue to do so today. They strategically look after the land, plant flora in a way that coexisted with the environment around them.

We must also consider practices that have taken place by Aboriginal people to care for country, fire management being a well-known tool of Aboriginal people to manage the landscape, creating ecosystems that today we may not see due to climate change and miss management by the Europeans. Aboriginal people have the knowledge of the land and how ecosystems work they recognised this and created landscapes that suited them and provide resource rich environments.

We must also consider burials within the area as Aboriginal people were majorly affected by colonisation and suffered from disposition of our land making it hard to be aware of where burials are today.

Our modern history that we must consider the last two hundred years has affected Aboriginal people dramatically and we are thriving considering the disposition and effects of colonization. Aboriginal

cultural groups come from all over NSW, as Aboriginal people were moved due to the stolen generation, this suggest that there are many cultural groups in this area. We must also consider the stolen generation as Parramatta being the first-place governor Macquarie started taking Aboriginal children away from families, place in the native institute near the town hall. Or the female factory and the children home these are all place that our young people were taken to and raised to be like the white people of the time, this is significant to our history of Parramatta.

The study area is highly significant to our people due to the location being in parramatta a culturally sensitive area. We would like to recommend a cultural interpretation plan for this project to educate the wider community and continuing the passing down of knowledge to our younger generations. This can be achieved through native landscaping, edible gardens, art, digital displays, sound scape, water features, with in your design and much more.

We would like to agree to your recommendation, and we support your report, we look forward to further consultation on this project.

Kind Regards

Kadibulla Khan



MURAGADI HERITAGE INDIGENOUS CORPORATION

47 Cuzco Street, South Coogee NSW 2035

Phone: 0418970389

14th June 2022

Raymond Raad

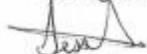
Dominic Steele

Dear Raymond & Dominic,

2a Gregory Place, Harris Park NSW

I have read the archaeological cultural heritage management plan for the above project; I agree with the recommendations made. I have also read and agree with The Proponent to use the test excavation methodology developed with the community and this ACHAR to support an application to HNSW for approval to test excavate the site to establish whether an Aboriginal Heritage Impact Permit (AHIP) is required under the National Parks and Wildlife Act 1974 (NPW Act) for the proposal if it is determined that Aboriginal objects are present and likely harmed by the redevelopment.

Kind regards



Jesse Johnson

EMAIL: muragadi@yahoo.com.au

ABN: 23 532 306 683

MURRABIDGEE MULLANGARI ABORIGINAL CORPORATION



Keeping the Pathways of our Ancestors Alive

7th June 2022

Attention: Raymond Raad

Cc: Dominic Steele

To Raymond & Dominic,

Re: 2a Gregory Place, Harris Park NSW

I have read the project information and recommendations made for the above project; I endorse the recommendations made. As I feel all points have been covered by Dominic Steele consultancy archaeology. If you require further details, please do not hesitate in contacting me.

Kind regards



Darleen Johnson
Administrator/Director

PO Box 3035 Rouse Hill NSW 2155
Mble: 0490051102

Email: murrabidgeemullangari@yahoo.com.au
ABN: 64 296 388 352

Re: 2a Gregory Place Harris Park



Scott Franks <scott@tocomwall.com.au>
To: Dominic Steele

You replied to this message on 4/06/2022 8:35 AM.

Reply Reply All Forward

Fri 3/06/2022 6:43 PM

2A Gregory Place Parramatta - Aboriginal Cultural Heritage Assessment - June 2022.pdf
5 MB

Dominic,

Thank you for reaching out to me. Tocomwall as a Registered party has taken the position with all projects with all firms the following.

Tocomwall does not support any methodologies or reports that Tocomwall's field staff have not been able to or been involved in the field assessment .

Tocomwall has been engaged of 100's of projects in the Sydney basin and worked with all the Raps most of these parts never provided any cultural information on site or even in reports and most do not have an ability to identify Artifacts. It is for these reasons that I cannot support these recommendations for this project.

Regards
Scott Franks

Consultant
Tocomwall Pty Ltd
scott@tocomwall.com.au
0404 171544

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Woka Aboriginal Corporation
145 Camarvon Rd Schofield NSW 2762
0406991221
wokacorp@yahoo.com

Statement: 2A Gregory Place Harris Park

8 June 2022

Attention: Ray Raad

We appreciate our involvement with this project and to provide our recommendations as per Aboriginal Culture Heritage.

It is our thoughts that upon demolition of existing structures and demolition of the concrete floors that Aboriginal artefacts may be present in the underlying soils and as such we would recommend test excavations of these areas to ascertain this. The site require remediation of impacted fill materials that have been identified to be present in locations beneath the factory and there is also a need for additional environmental assessment sampling and analysis at a number of locations to guide and enable the development. We advice that environmental assessment sampling and analysis would be required at a number of locations to provide a guide and further enable the development process.

Subject area and surrounds is well known to contain Aboriginal artefacts as discovered on various cultural heritage projects previously undertaken by numerous Archaeological companies, many of which we have been involved with.

We ask that once demolition is completed to be provided the findings of future contamination assessments and building demolition planning to the Project RAPs and invite our feedback.

Development with the Project Raps an archaeological research design and test excavation methodology for the site that is based on the results of contamination assessment and consideration of demolition planning.

We support Archeologist, Dom Steele and his recommendations, proposal and methods. Using a test excavation method advised by Dom, and reviews by community, and supported by ACHAR to accompany an application to HNSW for approval to test excavations on the project area.

Use the test excavation method advised; with the community and supported by the ACHAR; to accompany an application to HNSW for approval to test excavate the 2A Gregory Place, Harris Park, site.

Advice:

We advise that the Proponent include the RAPS in the development of an archaeological research design and test excavation methodology for the site, based on the result of contamination assessment and consideration of demolition planning.

The Proponent use the test excavation methodology, developed with the community and ACHAR to support an application to HNSW for approval to test excavate the site to establish whether an Aboriginal Heritage Impact Permit (AHIP) is required under the National Parks and Wildlife Act 1974(NPW Act) for the proposal if it is determined that Aboriginal objects are present and likely harmed by the redevelopment.

Regards

Steve Johnson – Director WAC

attachment c

statutory heritage context and controls

Commonwealth legislation

Environment Protection and Biodiversity Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) provides a legal framework for the protection and management of places of national environmental significance. The heritage lists addressed by the EPBC Act include the United Nations Educational, Scientific and Cultural Organization (UNESCO) World Heritage List (WHL), the National Heritage List (NHL), and the Commonwealth Heritage List (CHL).

World Heritage properties in Australia are matters of national environmental significance that are protected and managed under the EPBC Act. The NHL protects places with outstanding value to the nation. The CHL protects items and places owned or managed by Commonwealth agencies. Ministerial approval is required for actions that would have a significant impact on items and places on the WHL, NHL or CHL.

Any action that is likely to have a significant impact on a matter of National Environmental Significance (a controlled action under the Act) may only progress with approval of the Commonwealth Minister under Part 9 of the Act and any action will also require approval if:

- It is undertaken on Commonwealth land and will have or is likely to have a significant impact.
- It is undertaken outside Commonwealth land and will have or is likely to have a significant impact on the environment on Commonwealth land.
- It is undertaken by the Commonwealth and will have or is likely to have a significant impact.

The Act defines 'environment' as natural and cultural environments and includes consideration of Aboriginal and historic cultural heritage sites and items. Under the Act, protected heritage items are listed on the NHL or CHL. There are no Aboriginal sites or items identified within the study area under this Act.

Aboriginal and Torres Strait Islander Heritage Protection Act 1984

The purpose of the Aboriginal and Torres Strait Islander Heritage Protection Act 1984 is to preserve and protect areas and objects in Australia and in Australian waters that are of particular significance to Indigenous people in accordance with their traditions. This Act allows the Environment Minister to make a declaration protecting significant Indigenous areas or objects, including human remains, from 'threat of injury or desecration'. The Minister can also make emergency declarations where there is a serious and immediate threat. There are no specific areas under the remit of this Act within or near the study area.

Native Title Act 1993

This Act recognises and protects native title rights in Australia following the decision of the High Court of Australia in *Mabo & Ors v Queensland (No.2)* (1992) 175 CLR 1 ('Mabo'). It recognises Aboriginal peoples have rights and interests to land and waters arising from traditional laws and customs and establishes principles and mechanisms for preservation of Native Title whereby claimants can negotiate about some proposed developments if they have the right to negotiate if the native title claimant application satisfies registration test conditions.

There is a presumption of native title where a community or group can establish a traditional or customary connection with that area but does not apply to freehold title land or commercial, residential, pastoral, or agricultural leases. Searches of Tribunal's website show no native title, no registered native title claims, or Indigenous Land Use Agreements that apply to the site or lands in the immediate vicinity.⁶³

State legislation and heritage controls

Aboriginal Land Rights Act 1983

The *Aboriginal Land Rights Act 1983* (ALR 1983) establishes the administrative system of Local Aboriginal Land Councils across NSW. The objectives of each Local Aboriginal Land Council are to foster the best interests of all Aboriginal persons within the Council's area and other persons who are members of the Council. Harris Park is located within the administrative boundaries of Deerubbin Local Aboriginal Land Council (DLALC). The functions of the DLALC in relation to culture and heritage are to (a) to take action to protect the culture and heritage of Aboriginal persons in the Council's area, subject to any other law, and (b) to promote awareness in the community of the culture and heritage of Aboriginal persons in the Council's area. A Register of Aboriginal Owners must be maintained by the Registrar Under this Act; Aboriginal people who are '*directly descended from the original Aboriginal inhabitants of the cultural area in which the land is situated*' and who have '*a cultural association with the land that derives from the traditions, observances, customs, beliefs or history*' of the original Aboriginal inhabitants.

National Parks and Wildlife Act 1974

Legislation that provides statutory protection for Aboriginal heritage in NSW are the National Parks and Wildlife Act 1974 (as amended) and the National Parks and Wildlife Regulation 2019. The NPW Act protects Aboriginal objects and Places, and the Regulation provides a framework for undertaking activities and exercising due diligence.

Part 6 of the NPW Act provides protection for Aboriginal objects and places by establishing offences of harm. Harm is defined as destroying, defacing, damaging, or moving an Aboriginal object from the land. Under Section 86 of the NPW Act, it is an offence to knowingly, or cause or permit harm to an Aboriginal object (or Place) without prior written consent from the Director-General. Defences and exemptions to the offence of harm include that harm is carried out under the terms of an approved Aboriginal Heritage Impact Permit (AHIP). Section 87 of the NPW Act provides for defences of harm if due diligence has determined no Aboriginal object would be harmed, compliance with regulations or an approved code of practice was followed, and if it is shown as a low impact act and/or an unintended omission.

Section 5 of the NPW Act defines an Aboriginal object as: 'any deposit, object, or material evidence (not being a handicraft for sale) relating to Indigenous and non-European habitation of the area that comprises New South Wales, being habitation

⁶³ NNTT advise on Cultural Heritage in NSW: *The National Native Title Tribunal has undertaken steps to remove itself from the formal list of sources for information about Indigenous groups in development areas. The existence or otherwise of native title is quite separate to any matters relating to Aboriginal cultural heritage. Information on native title claims, native title determinations, and Indigenous Land Use Agreements is available on the Tribunal's website.*

before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction and includes Aboriginal remains’.

A declared Aboriginal Place (under Section 84 of the NPW Act) that is or was of special significance with respect to Aboriginal culture may or may not contain Aboriginal objects and the protection provided to Aboriginal objects and places applies irrespective of their significance or issues of land tenure.

State Significant Developments and the National Parks and Wildlife Act 1974

State Significant Development’s (SSD’s) that have been granted a development consent are exempt from the provisions of the NPW Act. However, issued SEARs for SSD’s still require detailed Aboriginal cultural heritage impact assessment and development of appropriate impact avoidance, mitigation, and management measures for proposed development site’s with potential Aboriginal archaeological sensitivity.

Environmental Planning and Assessment Act (1979)

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the main act regulating land use planning and development in NSW. The EP&A Act controls the making of environmental planning

attachment d

AHIMS data



AHIMS Web Services (AWS)
Search Result

Your Ref/PO Number : 2a Gregory Pl 50m

Client Service ID : 615741

Dominic Steele Archaeological Consulting

Date: 23 August 2021

21 Macgregor Street
CROYDON New South Wales 2132

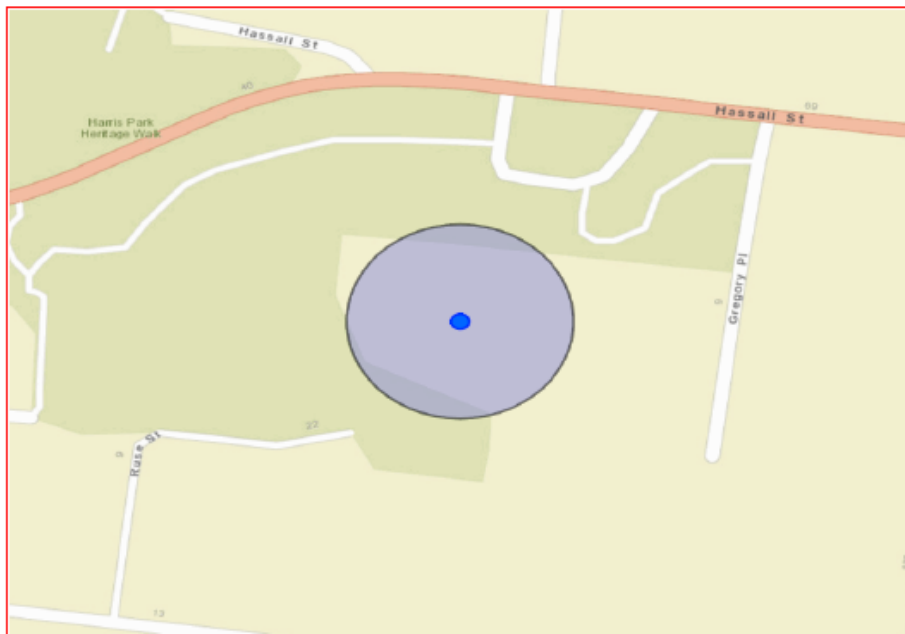
Attention: Dominic Steele

Email: dsca@bigpond.net.au

Dear Sir or Madam:

AHIMS Web Service search for the following area at Address : 2A GREGORY PLACE HARRIS PARK 2150 with a Buffer of 50 meters, conducted by Dominic Steele on 23 August 2021.

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



A search of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

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



AHIMS Web Services (AWS) Search Result

Your Ref/PO Number : 2A Gregory Pl 200m

Client Service ID : 615745

Dominic Steele Archaeological Consulting

Date: 23 August 2021

21 Macgregor Street
CROYDON New South Wales 2132

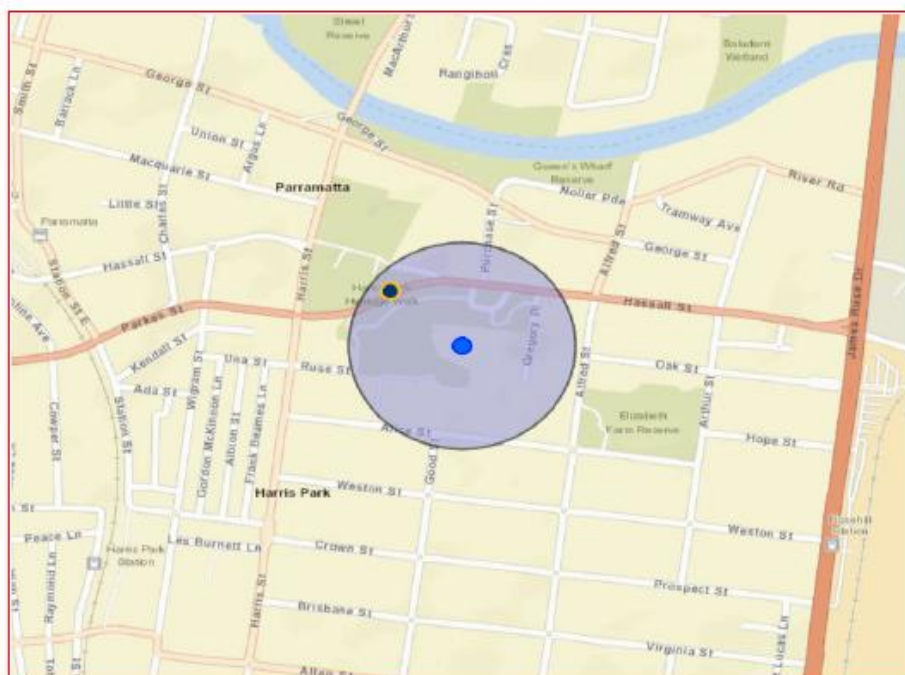
Attention: Dominic Steele

Email: dsca@bigpond.net.au

Dear Sir or Madam:

AHIMS Web Service search for the following area at Address : 2A GREGORY PLACE HARRIS PARK 2150 with a Buffer of 200 meters, conducted by Dominic Steele on 23 August 2021.

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



A search of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

1 Aboriginal sites are recorded in or near the above location.

0 Aboriginal places have been declared in or near the above location. *
--



AHIMS Web Services (AWS) Search Result

Your Ref/PO Number : 2A Gregory Place 1km

Client Service ID : 615752

Dominic Steele Archaeological Consulting

Date: 23 August 2021

21 Macgregor Street
CROYDON New South Wales 2132

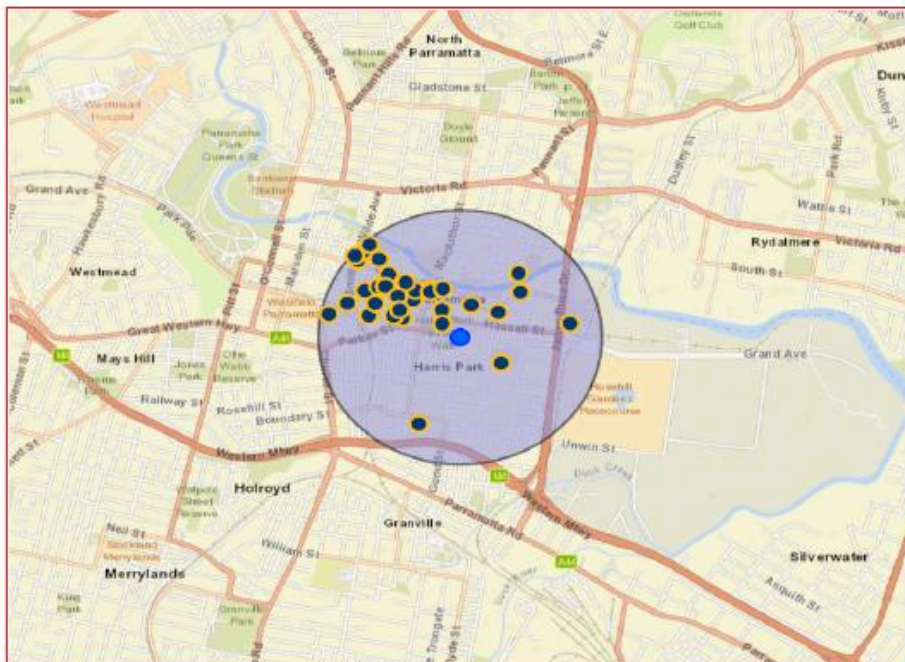
Attention: Dominic Steele

Email: dsca@bigpond.net.au

Dear Sir or Madam:

AHIMS Web Service search for the following area at Address : 2A GREGORY PLACE HARRIS PARK 2150 with a Buffer of 1000 meters, conducted by Dominic Steele on 23 August 2021.


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




A search of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

34 Aboriginal sites are recorded in or near the above location.
--


0 Aboriginal places have been declared in or near the above location. *
--

 AHIMS Web Services (AWS) Extensive search - Site list report										Your Ref/PO Number : 2A Gregory Place Item Client Service ID : 615755	
SHIELD	Site Name	Datum	Zone	Easting	Northing	Context	Site Status **	Site Features	Site Types	Reports	
45-6-2554	Bilbarrah Farmhouse <i>Contact</i>	ACID	56	316420	6255700	Open site	Valid	Archaeol :-	Open Camp Site	102196,10378 2	
45-6-2559	Sydney Turf Club Carpark,STC Carpark <i>Contact</i>	ACID	56	316900	6256020	Open site	Valid	Archaeol :-	Open Camp Site	102142,10219 6	
45-6-2627	HP-1 <i>Contact</i>	ACID	56	315860	6255210	Open site	Valid	Archaeol :-		102196	
45-6-2648	Charlton George 1 <i>Contact</i>	QDA	56	315690	6256470	Open site	Partially Destroyed	Archaeol :-, Potential Archaeological Deposit (PAD) :-		99538,102196	
45-6-2678	SSP1 (formerly Smith Street PAD) <i>Contact</i>	ACID	56	315330	6256150	Open site	Destroyed	Potential Archaeological Deposit (PAD) :-		1433,1682,2176,2240,2353,3,649,35,69,466; 99518,102196, 103782	
45-6-2668	Angyle St <i>Contact</i>	ACID	56	315200	6256060	Open site	Valid	Potential Archaeological Deposit (PAD) :-		102196,10378 2	
45-6-2669	Kendall Street, Harris Park <i>Contact</i>	ACID	56	315525	6256150	Open site	Valid	Potential Archaeological Deposit (PAD) :-		102196,10378 2	
45-6-2673	RTA-G1 <i>Contact</i>	QDA	56	315942	6256510	Open site	Valid	Archaeol :-		100552,10219 6,103782	
45-6-2738	James Ruse Reserve Open Camp 1 <i>Contact</i>	ACID	56	316000	6256000	Open site	Valid	Potential Archaeological Deposit (PAD) :-		102196,10378 2	
45-6-2741	Parramatta Transport Interchange PAD <i>Contact</i>	ACID	56	315450	6256250	Open site	Valid	Potential Archaeological Deposit (PAD) :-		99438,99497,1 02196,103782	
45-6-2863	Camberland Press Site <i>Contact</i>	QDA	56	315913	6256448	Open site	Valid	Archaeol :89		103782	
45-6-2893	95-101 George St (GSF AD) <i>Contact</i>	QDA	56	315720	6256570	Open site	Valid	Potential Archaeological Deposit (PAD) :-, Archaeol :-		101078,10378 2	
										3509	


Report generated by AHIMS Web Service on 23/08/2021 for Donnie Steele for the following area at Address : 2A GREGORY PLACE HARRIS PARK 2150 with a Buffer of 1000 meters. Number of Aboriginal sites and Aboriginal objects found is 34
 This information is not guaranteed to be free from error omission. Heritage NSW and its employees disclaim liability for any omissions or omission made on the information and consequences of such use or omission.

 AHIMS Web Services (AWS) Extensive search - Site list report										Your Ref/PO Number : 2A Gregory Place Item Client Service ID : 615755	
SiteID	Site Name	Datum	Zone	Easting	Northing	Context	Site Status **	Site Features	Site Types	Reports	
45-6-2950	Macquarie St PAD 2	GD A	56	315835	6256410	Open site	Destroyed	Potential Archaeological Deposit (PAD) :-		102144,10378 2	
Contract											
45-6-2976	George St PAD 1	GD A	56	315650	6256690	Open site	Valid	Potential Archaeological Deposit (PAD) :- 1	Permits 3 238,356		
Contract											
45-6-3102	Phillip Street PAD 1	GD A	56	315581	6256801	Open site	Valid	Potential Archaeological Deposit (PAD) :- 1	Permits 3 509,4766,4767		
Contract											
45-6-3068	GSPAD 1 184-188 George Street	GD A	56	315899	6256375	Open site	Destroyed	Potential Archaeological Deposit (PAD) :- 1	Permits 3 755	103962	
Contract											
45-6-3065	PHILLIP ST PAD 1	GD A	56	315500	6256675	Open site	Valid	Potential Archaeological Deposit (PAD) :- 1	Permits 3 584		
Contract											
45-6-3118	Clay Cliff Creek Lane	GD A	56	315801	6256294	Open site	Valid	Archae :- Archaeological Deposit (PAD) :- 1	Permits 102992,10299 7,102998		
Contract											
45-6-3131	River Road West	GD A	56	316650	6256450	Open site	Valid	Potential Archaeological Deposit (PAD) :- Archae :-	Permits 3 788	102338	
Contract											
45-6-3158	Room Thomas Reserve	GD A	56	316100	6256300	Open site	Partially Destroyed	Aboriginal Resource and Gathering :- Potential Archaeological Deposit (PAD) :- Archae :-	Permits 3 734,4657		
Contract											
45-6-3157	Harris & Poopah	GD A	56	316013	6256461	Open site	Valid	Archae :-	Permits 4 439		
Contract											
45-6-3180	21 Hassell Street	GD A	56	315761	6256247	Open site	Partially Destroyed	Potential Archaeological Deposit (PAD) :- 1	Permits 3 906,3975	103758	

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 AHIMS Web Services (AWS) Extensive search - Site list report										Your Ref/PO Number : 2A Gregory Place Item Client Service ID : 615755	
SiteID	SiteName	Datum	Zone	Easting	Northing	Contact	Site Status **	SiteFeatures	SiteTypes	Remarks	
45-6-3312	PLR APT 1	QDA	S6	316105	6256465	Open site	Valid	Artifact :-			
Contact											
		Kelleher Nightingale Consulting Pty Ltd/McCracken Mitchell									
45-6-3313	PLR APT 2	QDA	S6	316905	6256240	Open site	Valid	Artifact :-			
Contact											
		Kelleher Nightingale Consulting Pty Ltd/McCracken Mitchell									
45-6-3214	Wigram & Hassall S AS	QDA	S6	315825	6256231	Open site	Valid	Artifact : 1, Potential Archaeological			
Contact											
		Buxton Heritage Pty Ltd - Pyramont - Individual user M.A. Alear/Hooks									
45-6-3503	32 Smith Street	QDA	S6	315536	6256745	Open site	Partially Destroyed	Potential Archaeological		103 963, 10 396 4, 1039/65	
Contact											
		AMAC Group P/L, M. Benjamin Street									
45-6-3630	Hassall St PAD	QDA	S6	315587	6256244	Open site	Destroyed	Potential Archaeological		4268 4347	
Contact											
		Comber Consultants Pty Limited, Ms. Jillian Comber									
45-6-3495	116 Macquarie St Perannara	QDA	S6	315700	6256475	Open site	Valid	Potential Archaeological		4412 4527 103 792	
Contact											
		Comber Consultants Pty Limited, Comber Consultants Pty Limited, Ms. Alexandra Tarsi									
45-6-3702	Smith St PAD1	QDA	S6	315480	6256713	Open site	Destroyed	Artifact :-, Potential Archaeological		4607 4651	
Contact											
		Comber Consultants Pty Limited, Comber Consultants Pty Limited, Ms. Jillian Comber									
45-6-3837	Baldern Drive PAD	QDA	S6	316635	6256597	Open site	Not a Site	Potential Archaeological		4513 4756	
Contact											
		Comber Consultants Pty Limited, Comber Consultants Pty Limited, Ms. Jillian Comber									
45-6-3801	APBS Stone and Glass Artifacts	QDA	S6	315650	6256471	Open site	Partially Destroyed	Artifact :-, Hearth :-, Archaeological		4657	
Contact											
		Buxton Heritage Pty Ltd - Pyramont - Individual user s/Steve Heritage Pty Ltd - Pyramont									
45-6-3895	PLR Macquarie S PAD	QDA	S6	315787	6256398	Open site	Valid	Potential Archaeological			
Contact											
		GML Heritage Pty Ltd - Surry Hills, GML Heritage Pty Ltd - Surry Hills, Doctor Tim Owen									
45-6-3896	PLR George St PAD	QDA	S6	316497	6256288	Open site	Valid	Potential Archaeological			
Contact											
		GML Heritage Pty Ltd - Surry Hills, Doctor Tim Owen									

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AHIMS Web Services (AWS)
 Extensive search - Site list report

Your Ref/PO Number : 2A Gregory Place Item
 Client Service ID : 615755

SiteID	Site Name	Datum	Zone	Easting	Northing	Context	Site Status **	Site Features	Site Type	Reports
45-6-3897	PLR RTR America and PAD	GDA	56	316017	6256441	Open site	Valid	Archaeol - Potential Archaeological Deposit (PAD) :- Ceramics		
Contact		Records: GML Heritage Pty Ltd - Serry Hilka, Doctor Tim Owen								

**** Site Status**

Valid - The site has been recorded and accepted onto the system as valid

Quarried - The site has been completely impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There is nothing left of the site on the ground but reports should proceed with caution

Partially Quarried - The site has been only partially impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There might be parts or sections of the original site still present on the ground

Not a site - The site has been originally entered and accepted onto AHIMS as a valid site but later further investigations have decided it is NOT an original site. Impact of the type of site does not require permit but Heritage NSW should be notified

Report generated by AHIMS Web Service on 23/08/2021 for Dominic Steele for the following area at Address : 2A GREGORY PLACE HARRIS PARK 2150 with a Buffer of 1000 meters. Number of Aboriginal sites and Aboriginal objects found is 34

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Page 4 of 4

