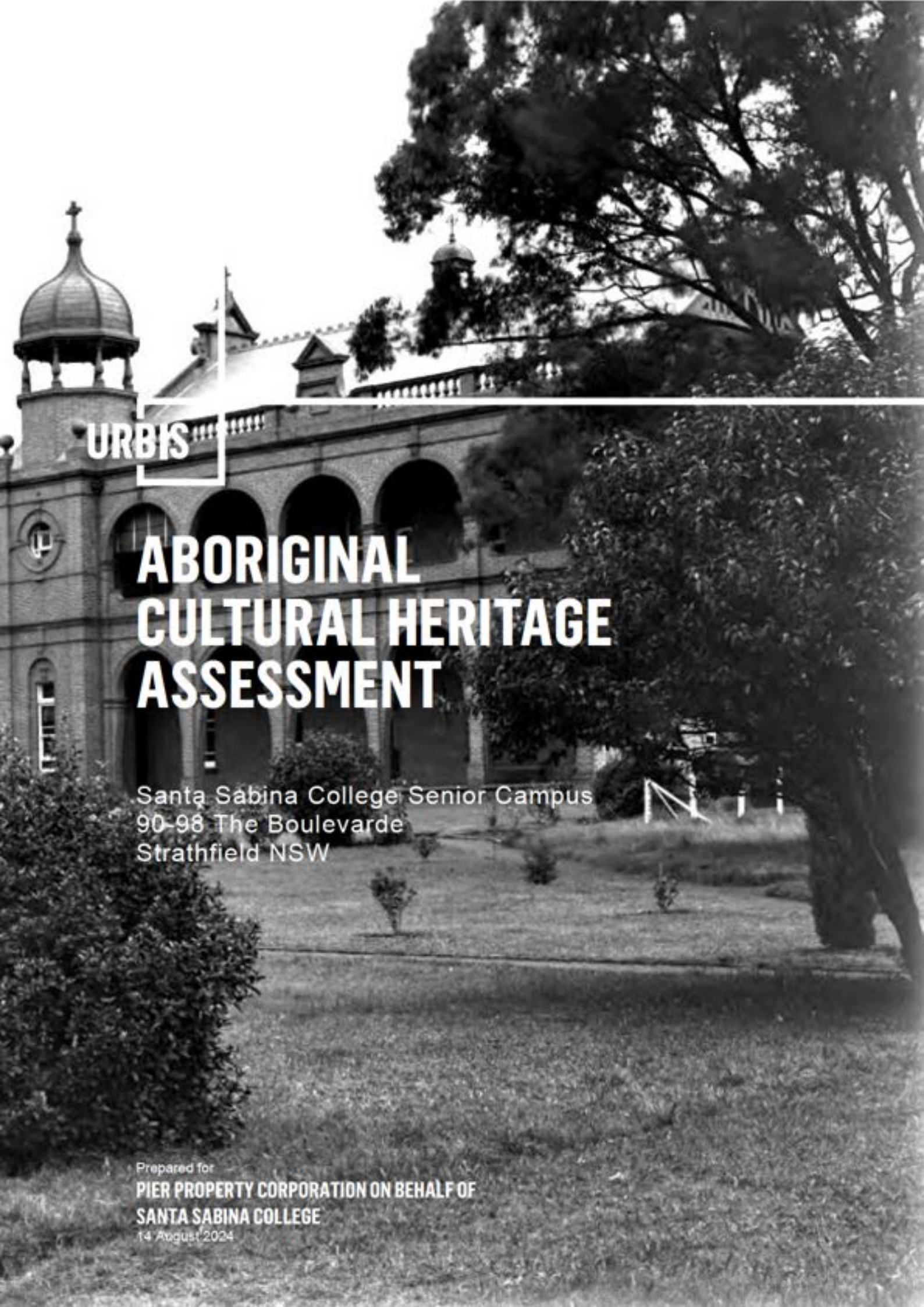


A black and white photograph of the Santa Sabina College Senior Campus. The building is a large, multi-story structure with a series of arches on the ground floor and a prominent dome on the left side. Large trees are visible in the foreground and background, partially obscuring the building. The text 'URBIS' is overlaid on the left side of the image.

URBIS

ABORIGINAL CULTURAL HERITAGE ASSESSMENT

Santa Sabina College Senior Campus
90-98 The Boulevard
Strathfield NSW

Prepared for
**PIER PROPERTY CORPORATION ON BEHALF OF
SANTA SABINA COLLEGE**
14 August 2024

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Report Historuy	Draft issued 03 April 2024
	Final issued 29 May 2024
	Update issued 14/08/2024

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

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

Cover Image: 'Santa Sabina Ladies College, Strathfield, New South Wales', by A.G. Foster (c. 1920)
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GLOSSARY

Term	Definition
Aboriginal ceremony and dreaming site	Previously referred to as mythological sites, these are spiritual/story places where no physical evidence of previous use of the place may occur, e.g. natural unmodified landscape features, ceremonial or spiritual areas, men's/women's sites, dreaming (creation) tracks, marriage places etc. These are Aboriginal site features recordable on AHIMS.
Aboriginal cultural heritage	The tangible (objects) and intangible (dreaming stories, legends and places) cultural practices and traditions associated with past and present-day Aboriginal communities.
Aboriginal object	As defined in the NPW Act, any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.
Aboriginal place	As defined in the NPW Act, any place declared to be an Aboriginal place (under s.84 of the NPW Act) by the Minister administering the NPW Act, by order published in the NSW Government Gazette, because the Minister is of the opinion that the place is or was of special significance with respect to Aboriginal culture. It may or may not contain Aboriginal objects.
Aboriginal resource and gathering sites	Related to everyday activities such as food gathering, hunting, or collection and manufacture of materials and goods for use or trade. These are Aboriginal site features recordable on AHIMS.
AHIMS	Aboriginal Heritage Information Management System. A register of previously reported Aboriginal objects and Aboriginal places in NSW, managed under Section 90 of the NPW Act.
AHIP	Aboriginal Heritage Impact Permit. A permit issued under Section 90, Division 2 of Part 6 of the NPW Act.
Archaeology	The scientific study of material remains of past human life, including artefacts, relics, ruins, buildings and their environment and context.
Art	Art is found in shelters, overhangs and across rock formations. Techniques include painting, drawing, scratching, carving engraving, pitting, conjoining, abrading and the use of a range of binding agents and the use of natural pigments obtained from clays, charcoal and plants. These are Aboriginal site features recordable on AHIMS.
Artefact	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people. These are Aboriginal site features recordable on AHIMS.
Artefact scatter	Multiple artefacts associated with one another in the same context. These are recordable on AHIMS as 'artefacts'.
Burial	A traditional or contemporary (post-contact) burial of an Aboriginal person, which may occur outside designated cemeteries and may not be marked, e.g. in caves, marked by stone cairns, in sand areas, along creek banks etc. These are Aboriginal site features recordable on AHIMS.

Term	Definition
Ceremonial ring	A Raised earth ring associated with ceremony. These are Aboriginal site features recordable on AHIMS.
Cliff	A steep rock face
Code of Practice	<i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> (DECCW 2010b).
Conflict site	Previously referred to as massacre sites where confrontations occurred between Aboriginal and non-Aboriginal people, or between different Aboriginal groups. These are Aboriginal site features recordable on AHIMS.
DECCW	Department of Environment, Climate Change and Water NSW.
Due Diligence Code	<i>Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales</i> (DECCW 2010a)
Dune	As defined in the Due Diligence Code, a sand ridge or sand hill formed by the wind.
Earth mound	A mounded deposit of round to oval shape containing baked clay lumps, ash, charcoal and, usually, black or dark grey sediment. The deposit may be compacted or loose and ashy. Mounds may contain various economic remains such as mussel shell and bone as well as stone artefacts. Occasionally they contain burials. These are Aboriginal site features recordable on AHIMS.
EPA Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
Fish trap	A modified area on watercourses where fish were trapped for short-term storage and gathering. These are Aboriginal site features recordable on AHIMS.
Grinding grooves	A groove in a rock surface resulting from manufacture of stone tools such as ground edge hatchets and spears, or rounded depressions resulting from grinding of seeds and grains. These are Aboriginal site features recordable on AHIMS.
Harm	As defined in the NPW Act, to destroy, deface, damage or move an Aboriginal object or destroy, deface or damage a declared Aboriginal place. Harm may be direct or indirect (e.g. through increased visitation or erosion). Harm does not include something that is trivial or negligible.
Habitation structure	Structures constructed by Aboriginal people for short- or long-term shelter. Temporary structures are commonly preserved away from the coastline and may include historic camps of contemporary significance. Smaller structures may make use of natural materials such as branches, logs and bark sheets or manufactured materials such as corrugated iron to form shelters. Archaeological remains of a former structure such as chimney/fireplace, raised earth building platform, excavated pits, rubble mounds etc. These are Aboriginal site features recordable on AHIMS.
Headland	A narrow piece of coastal land that projects from a coastline into the sea or ocean
Hearth	Aboriginal site feature recordable on AHIMS. Cultural deposit sometimes marked by hearth stones, usually also contains charcoal and may also contain heat treated stone fragments.
Isolated find	A single artefact found in an isolated context. These are recordable on AHIMS as 'artefacts'.

Term	Definition
Modified Trees	Trees which show the marks of modification as a result of cutting of bark from the trunk for use in the production of shields, canoes, boomerangs, burials shrouds, for medicinal purposes, foot holds etc, or alternately intentional carving of the heartwood of the tree to form a permanent marker to indicate ceremonial use/significance of a nearby area, again these carvings may also act as territorial or burial markers. These are Aboriginal site features recordable on AHIMS.
Non-human bone and organic material	Objects which can be found within cultural deposits as components of an Aboriginal site such as fish or mammal bones, ochres, cached objects which may otherwise have broken down such as resin, twine, dilly bags, nets etc. These are Aboriginal site features recordable on AHIMS.
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPW Regulation	<i>National Parks and Wildlife Regulation 2019</i>
Ochre quarry	A source of ochre used for ceremonial occasions, burials, trade and artwork. These are Aboriginal site features recordable on AHIMS.
PAD	A 'potential archaeological deposit'. An area where Aboriginal objects may occur below the ground surface. These are Aboriginal site features recordable on AHIMS.
Ridge	A compound landform element comprising a narrow crest that is longer than its width
Ridge top (or ridgeline)	The crest of a ridge that extends along its highest contours
Shell	An accumulation or deposit of shellfish from beach, estuarine, lacustrine or riverine species resulting from Aboriginal gathering and consumption. Usually found in deposits previously referred to as 'shell middens.' These are Aboriginal site features recordable on AHIMS.
SSDA	State Significant Development Application, under Division 4.7 of the EP&A Act
Stone arrangement	Human produced arrangements of stone usually associated with ceremonial activities, or used as markers for territorial limits or to mark/protect burials. These are Aboriginal site features recordable on AHIMS.
Stone quarry	A source of stone which was quarried and used for the production of stone tools by Aboriginal people. These are Aboriginal site features recordable on AHIMS.
Waterhole	A source of fresh water for Aboriginal groups which may have traditional ceremonial or dreaming significance and/or may also be used to the present day as a rich resource gathering area (e.g. waterbirds, eels, clays, reeds etc). These are Aboriginal site features recordable on AHIMS.
Waters	As defined in the Due Diligence Code, the whole or any part of any river, stream, lake, lagoon, swamp, wetlands, natural watercourse and tidal waters (including the sea), where the boundary of tidal waters is defined as the high-water mark.

EXECUTIVE SUMMARY

Urbis was engaged by Pier Property Corporation on behalf of Santa Sabina College ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of 90-98 The Boulevard, Strathfield, NSW, legally defined as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088 ('the subject site').

The Proponent is proposing the construction of a new sport and aquatic centre within the subject site, including demolition and enabling works. Approval is being sought for the development under a State Significant Development Application (SSD-68054209). The present ACHA report addresses Item 18 of the Planning Secretary's Environmental Assessment Requirements (SEARs) for SSD-68054209 which were issued on 7 March 2024.

The ACHA was undertaken in accordance with the requirements of regs. 60 and 61 of the *National Parks and Wildlife Regulation 2019* (NSW) and the following guidelines:

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

The aim of the ACHA is to investigate whether future development of the development site is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject site and to formulate measures for avoiding or minimising any such impacts.

The ACHA concluded that:

- **Conclusion 1 – Known Aboriginal Objects and Places**

No known Aboriginal objects or Aboriginal places have been identified that are within, or likely to be within, the curtilage of the subject site.

- **Conclusion 2 – Sensitive Landscape Features**

The entire subject site is located within 200 m of at least one former natural creek, which is considered indicative of likely past Aboriginal land use.

- **Conclusion 3 – Ground Disturbance**

Ground disturbance is assessed to be high across the entire subject site in view of evidence of land clearance, grazing, construction of buildings, earthworks (e.g. construction of playing fields and landscaping) and installation of services in shallow topsoil and further in view of geotechnical investigations which indicate an absence of topsoil across a large part of the subject site.

- **Conclusion 4 – Archaeological Potential**

As the subject site has been subjected to a high level of historical ground disturbance and it is unlikely that any intact natural topsoil remains anywhere in the subject site, the archaeological potential of the subject site is assessed to be Very Low.

- **Conclusion 5 – Significance Assessment**

The subject site is assessed as having low Aboriginal cultural heritage significance for its connection to the broader cultural landscape around the subject site and for the long connection Aboriginal people have with the area, noting that there is no evidence of a specific Aboriginal association with the subject site and the high level of ground disturbance in the subject site is likely to have diminished any social and cultural value.

- **Conclusion 6 – Impact Assessment**

As there are no known Aboriginal objects within the subject site and it is unlikely to retain any as yet unknown Aboriginal objects, the proposed physical works are unlikely to cause either direct or indirect harm to Aboriginal objects or negatively impact inter-generational equity.

Based on the above conclusions, Urbis recommends the following:

▪ **Recommendation 1 – Submission of Report**

A copy of this report should be submitted with the Environmental Impact Statement (EIS) in support of SSD-68054209.

▪ **Recommendation 2 – No Further Archaeological Investigation**

As the proposed works are unlikely to cause harm to Aboriginal objects, it is recommended that no further investigation is required for the present development. The proposed development can proceed in line with the Archaeological Unexpected Finds Procedure and Human Remains Procedure outlined below.

▪ **Recommendation 3 – Unexpected Archaeological Finds Procedure**

Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW, preparation of a research design and archaeological investigation/salvage methodology and registration of the find with the Aboriginal Heritage Information Management System (AHIMS).
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject site may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

▪ **Recommendation 4 – Human Remains Procedure**

Should any clearly identifiable human remains, or suspected human remains, be uncovered during any works within the subject site:

1. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW.
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

In the event that bones are uncovered which may be human but cannot be confirmed by onsite staff, a suitably qualified archaeologist or heritage specialist should be contacted in the first instance to determine how to proceed.

1. INTRODUCTION

Urbis was engaged by Pier Property Corporation on behalf of Santa Sabina College ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of 90-98 The Boulevard, Strathfield, NSW, legally defined as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088 ('the subject site') (Figure 1 and Figure 2).

The Proponent is proposing the construction of a new sport and aquatic centre within the subject site, including demolition and enabling works. Approval is being sought for the development under a State Significant Development Application (SSD-68054209). The Planning Secretary's Environmental Assessment Requirements (SEARs) for SSD-68054209 were issued on 7 March 2024. The present ACHA report addresses SEARs Item 18, which is recited in Table 1 below.

Table 1 – SEARs requirements.

Item	Requirement	Documentation
18. Aboriginal Cultural Heritage	Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts to any Aboriginal cultural heritage sites or values associated with the site.	Addressed by the Present ACHA report.

The ACHA was undertaken in accordance with the requirements of regs. 60 and 61 of the *National Parks and Wildlife Regulation 2019* (NSW) and the following guidelines:

- *Applying for an Aboriginal Heritage Impact Permit guide for applicants* (OEH 2011a)
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011b) ('the Assessment Guidelines').
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) ('the Consultation Guidelines')
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) ('the Code of Practice').

The aim of the ACHA is to investigate whether future development of the subject site is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject site and to formulate measures for avoiding or minimising any such impacts.

1.1. SUBJECT SITE

The subject site (also referred to as 'the site') is located at 90-98 The Boulevard, Strathfield, NSW and is legally referred to as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088. The subject site is located approximately 10 km west of the Sydney CBD. It is within the Burwood LGA and within the administrative bounds of the Metropolitan Local Aboriginal Land Council ('Metropolitan LALC').

The area subject to the proposed development ('the development site') is contained within the subject site and is bounded by the blue outline in Figure 4. The development site comprises the land whereby all works that form part of the SSDA are proposed and is confined to two areas of the site (Figure 4). The relevant legal description for the development site is Lot A DP388128, Lot 12 DP1297911 and Lot 2 DP2791.

To the north, the subject site is bounded by Russell Lane and medium density residential apartments. To the east of the subject site is bounded by Wentworth Road. To the south, the subject site is bounded by Jersey Road, Goondie Aged Care and a number of residential dwellings. To the west, the subject site is bounded by the Boulevard.

The subject site presently accommodates the existing Santa Sabina College Senior School and includes a number of existing buildings and facilities to enable the functioning of the school.

1.2. PROPOSED ACTIVITY

The proposed development of the subject site comprises demolition and enabling works as well as the construction of the sport and aquatic centre. Plans of the proposed development are provided in Figure 3.

The proposed development will include the following works:

- Demolition of existing outdoor courts and car park to the north of the existing pool
- Construction of a new sports centre (of 2,852 sqm GFA) building including:
 - Main entrance and foyer area to the southwest
 - 3 x indoor multipurpose sports courts / hall
 - Covered promenade to the south connecting the 1967 Centenary building
 - Stage
 - Lift and stairs from the car park level
 - 2 x sports offices
 - Staff bathrooms
 - Student amenities - bathrooms / changerooms
 - Gym
 - Storage and building services
 - Undercroft car parking
 - Minor landscaping works

1.3. STATUTORY CONTEXT

The protection and management of Aboriginal cultural heritage items, places and archaeological sites within New South Wales is governed by the relevant Commonwealth, State or local government legislation. These are discussed below in relation to the present subject site.

1.3.1. Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (Cth) ('the EPBC Act') provides protection for properties and places listed on the World Heritage List ('WHL'), the National Heritage List ('NHL') and the Commonwealth Heritage List ('CHL').

The WHL is a list of properties around the world considered to be of outstanding value to humanity, the NHL is a list of places of outstanding significance to the nation and the CHL is a list heritage places owned or controlled by the Australian Government. The WHL, NHL and CHL may include properties and places of Aboriginal heritage significance, in addition to places of natural and historical significance.

It is an offence under sections 15A, 15C, 27A and 27C of the EPBC Act to take any action that is likely to have a significant impact of the relevant heritage values of a place listed on the WHL, NHL or CHL. Approval from the Minister is required for controlled actions which will have a significant impact on items and places included on the WHL, NHL or CHL.

Properties and places listed on the WHL, NHL or CHL, are included in the Australian Heritage Database ('AHD'). The AHD also includes places under consideration, or that may have been considered, for any one of these lists. A search of the AHD was undertaken on 8 February 2024. The search identified three historic items within the curtilage of the subject site that are listed on the Register of the National Estate. The search did not identify any Aboriginal heritage properties or places within the curtilage of the subject site that are protected under the EPBC Act.

1.3.2. The National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NSW) ('the NPW Act') protects 'Aboriginal objects' and 'Aboriginal places' in NSW. The NPW Act defines 'Aboriginal objects' and 'Aboriginal places' as follows:

- **Aboriginal object** means any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.
- **Aboriginal place** means any place, which may or may not contain Aboriginal objects, that is declared to be an Aboriginal place under section 84 of the NPW Act because it is or was of special significance with respect to Aboriginal culture.

Under section 86 of the NPW Act, it is an offence to harm or desecrate an Aboriginal object or Aboriginal place. Section 87 of the NPW Act provides the following defences to prosecution under s. 86 of the NPW Act:

- The harm was to a previously unknown Aboriginal object, other than a modified tree, and was caused by a low impact activity as defined in reg. 58 of the NPW Reg.
- The harm was to a previously unknown Aboriginal object and due diligence was exercised by the Proponent to determine whether the activity would harm an Aboriginal object and reasonably determined that no Aboriginal object would be harmed, per section 87(2) of the NPW Act.
- The harm or desecration was authorised by an Aboriginal Heritage Impact Permit ('AHIP'), per section 87(1) of the NPW Act.
- The harm or desecration was authorised by an approved State Significant Development Application, per section 4.41(1)(d) of the *Environmental Planning and Assessment Act 1979* (NSW).

The ACHA was undertaken in support of a State Significant Development Application (SSD-68054209) which seeks approval for the proposed works outlined in Section 1.2.

1.4. AUTHORSHIP

The present report has been prepared by Aaron Olsen (Senior Archaeologist, Urbis) and Ginger-Rose Harrington (Urbis Archaeologist) with review and quality control undertaken by Ali Byrne (Urbis, Associate Director).

Aaron Olsen holds a Diploma of Arts (Archaeology) from the University of Sydney, a Bachelor of Science (Honours - First Class in Chemistry) and PhD (Chemistry) from the University of Newcastle and a Masters (Industrial Property) from the University of Technology Sydney. Ginger-Rose Harrington holds a Bachelor of Ancient History (Archaeology) from Macquarie University. Ali Byrne holds a Bachelor of Arts (Archaeology) from Sydney University.

1.5. LIMITATIONS

The ACHA is limited to consideration of Aboriginal objects and places. Historical heritage properties and places protected under the EPBC Act and historical heritage items and relics protected under the *Heritage Act 1977* (NSW) are not considered.

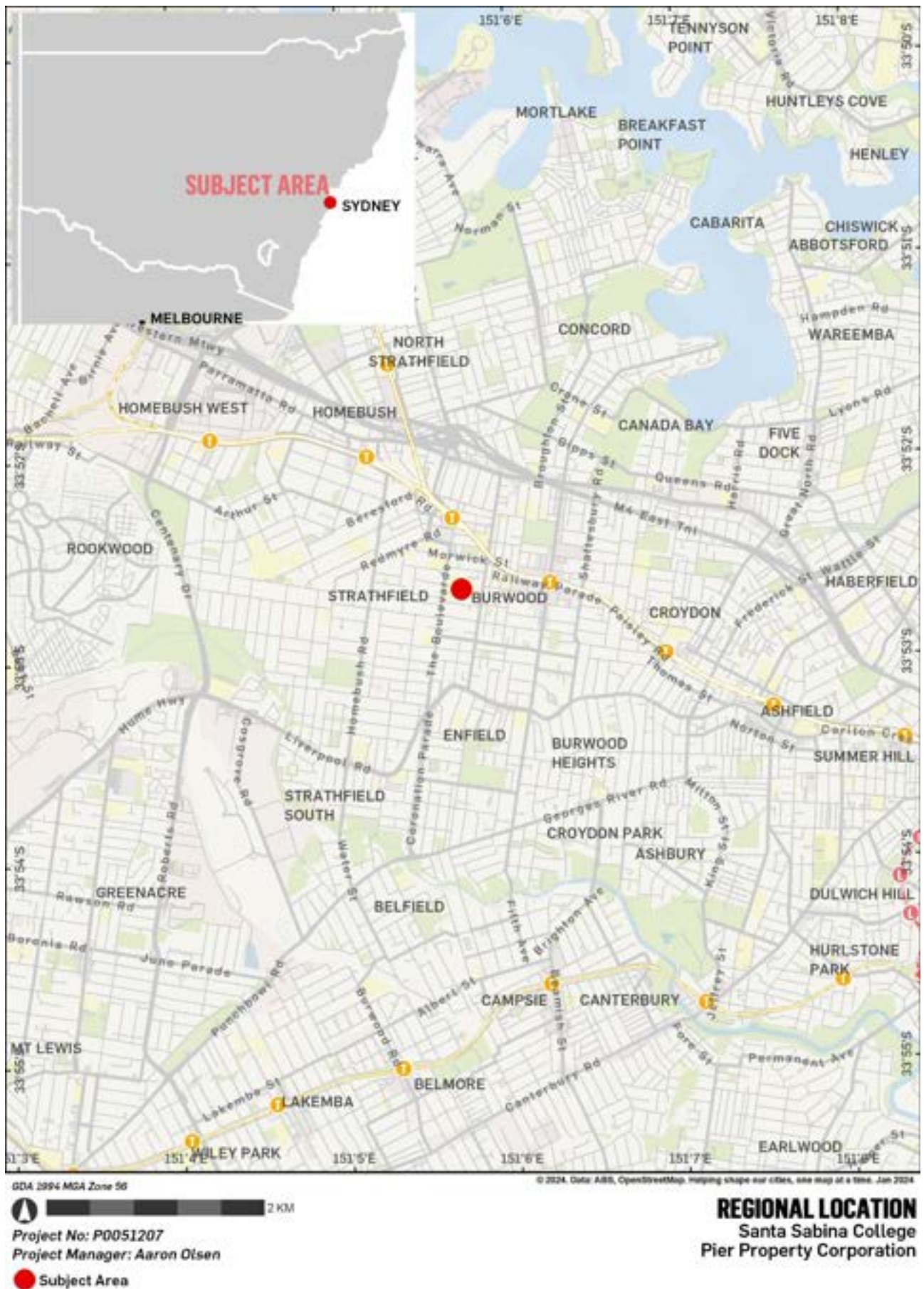


Figure 1 – Regional location of subject site



COA 1994 MGA Zone S6

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Project No: P0051207

Project Manager: Aaron Olsen

■ Subject Area
 ■ Area of Proposed Impact

LOCATION OF THE SUBJECT AREA
 Santa Sabina College
 Pier Property Corporation

Figure 2 – Subject site and areas of proposed impact

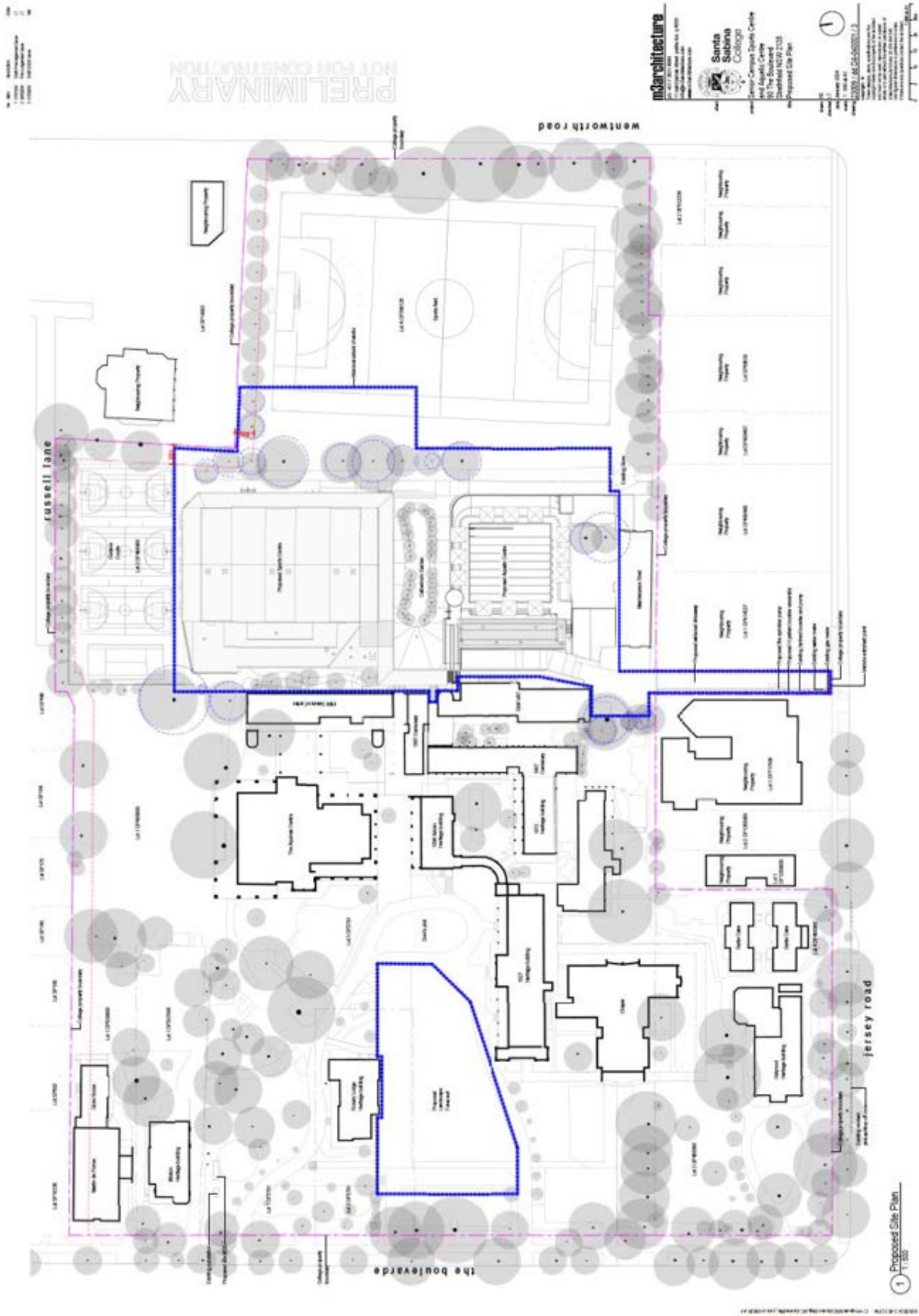


Figure 3 – Proposed development site plan
Source: m3 Architecture

2. ABORIGINAL CONSULTATION

Consultation with the Aboriginal community is required under reg. 60 of the NPW Reg and the Consultation Requirements. The purpose of consultation with Aboriginal people is to understand their views and concerns about the proposed project and to understand the cultural values present in the area that may be harmed. Consultation ensures that Aboriginal people have the opportunity to improve assessment outcomes by providing relevant cultural information, influencing assessment methodology, contributing to the development of cultural heritage management options and reviewing and commenting the draft assessment report.

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

- Stage 1 – Notification of project proposal and registration of interest.
- Stage 2 – Presentation of information about the proposed project.
- Stage 3 – Gathering information about the cultural significance.
- Stage 4 – Review of draft cultural heritage assessment report.

The following section documents the conduct and results of the Aboriginal consultation undertaken as part of the present assessment.

2.1. STAGE 1 – NOTIFICATION AND REGISTRATION

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

2.1.1. Native Title

A search of the National Native Title Tribunal (NNTT) registers and databases was undertaken on 17 January 2024. The search identified no pending Native Title claims or Native Title registrations for the subject site. The NNTT was also contacted by email on 17 January 2024 to request a formal search of the NNTT Register. A reply was received on 18 January 2024 indicating that there are no Native Title matters overlapping with the subject site.

2.1.2. Identification of Cultural Knowledge Holders

To identify Aboriginal people who may be interested in registering as Aboriginal parties for the project, the organisations stipulated in Section 4.1.2 of the Consultation Guidelines were contacted on 19 January 2024 (Table 2). A copy of the email sent to each of the contacted organisations is included in Appendix C. A total of 54 Aboriginal parties with a potential interest in the subject site were identified during this stage.

Table 2 – Contacted organisations

Organisation	Notification Sent	Response Received
Burwood Council	19 January 2024	n/a
Greater Sydney Local Land Services	19 January 2024	n/a
Heritage NSW	19 January 2024	22 January 2024
Metropolitan Local Aboriginal Land Council	19 January 2024	n/a
National Native Title Tribunal	19 January 2024	n/a
NTS Corp	19 January 2024	n/a
Office of the Registrar, Aboriginal Land Rights Act 1983	19 January 2024	29 January 2024

Letters were sent to the 54 identified Aboriginal parties by either email or mail on 24 January 2024 to notify them of the proposed project. The letters included a brief introduction to the project and the project location including a map of the subject site and set a deadline for response of 7 February 2024, providing the required 14 days to register an interest. A copy of the letter is included in Appendix C.

A public notice was also placed in a local newspaper to open registration to the broader Aboriginal community. A search of an online database of local newspapers ('newspapers.com.au') was undertaken to identify local newspapers within the Strathfield area. The search identified two local newspapers, the 'Inner West Weekly' and the 'Burwood Scene'. The latter was subsequently identified as an online blog rather than a newspaper. The 'Inner West Weekly' (aka 'Inner West Courier') is now an online-only news platform as part of the 'Daily Telegraph' masthead. A public notice was therefore placed in the online classified advertisement section of the Daily Telegraph ('<https://www.buysearchsell.com.au/>'), which is linked to the 'Inner West Weekly'. The advertisement was published online on 23 January 2024 and registration was open until 7 February 2024, providing the required 14 days to register an interest. A copy of the advertisement is included in Appendix C.

2.1.3. Registration of Interest

A total of eight Aboriginal parties registered interest in the project as a result of this phase (Table 3). Acknowledgement emails were made by Urbis to all respondents to confirm registration had been received.

A list of the Registered Aboriginal Parties (RAPs) was provided to Heritage NSW and Metropolitan Local Aboriginal Land Council on 16 February 2024 (see Appendix C).

Table 3 – Registered Aboriginal Parties

Registered Party	Contact
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

2.2. STAGE 2 & 3 – PRESENTING AND GATHERING INFORMATION

The aim of Stages 2 and 3 of the community consultation process is to provide RAPs with information about the scope of the proposed project and the proposed ACHA methodology, to gather feedback on the proposed project and proposed methodology and to gather any cultural information that the RAPs wish to share.

Table 5 – RAP attendees at site visit and meeting

RAP	Representative
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Table 6 – RAP comments during site visit and meeting

[illegible]

2.2.3. Connecting with Country Workshop

A separate communication was issued on 13 May 2024 inviting the RAPs to participate in a Connecting with Country Workshop on campus at Santa Sabina College. Two (2) responses to the invitation were received, as outlined in Table 7.

The Connecting with Country workshop was held to inform the landscaping decisions in the area of the current Siena Hall, which is proposed to be demolished. It sought to listen to traditional owners, discuss cultural issues and to workshop preliminary design ideas. Key comments received during the workshop are included in Table 8.

Preliminary landscape designs were provided to the RAPs on 3 July 2024 for internal review and comment. One (1) response was received on 12 August 2024 and has been replicated in Table 9.

Table 7 – RAP attendees at Connecting with Country workshop

RAP	Representative
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

Table 8 – RAP comments during Connecting with Country workshop

RAP	Comment	Urbis Response
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

Table 9 – RAP comments on the proposed landscape designs

RAP	Comments
[REDACTED]	[REDACTED]

2.3. STAGE 4 – REVIEW OF DRAFT ACHA REPORT

The aim of Stage 4 of the community consultation process is to prepare and finalise an ACHA report with input from RAPs.

A draft of the present ACHAR was sent to RAPs via email on 03 April 2024 with comment on the draft ACHAR requested by 01 May 2024, providing 28 days to respond. Three responses were received in relation to the Stage 4 draft ACHA report. The responses are included in Appendix C and addressed in Table 10 below.

Table 10 – RAP responses to the Stage 4 Draft ACHA Report

RAP	Comments	Urbis Response
[REDACTED]	[REDACTED]	[REDACTED]

RAP	Comments	Urbis Response
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

3. DESKTOP ASSESSMENT

The aim of the desktop assessment is to determine whether any known Aboriginal objects are located within the subject and whether the subject site is likely to retain any unknown Aboriginal objects. The findings of the desktop assessment inform the archaeological survey of the subject site and contribute to the determining whether an archaeological test excavation is required.

3.1. ARCHAEOLOGICAL CONTEXT

The archaeological context of the subject site encompasses previous archaeological and ethnohistorical studies that are relevant to determining the nature and distribution of Aboriginal archaeological material within the local region and subject site and local region.

3.1.1. Aboriginal Land Use

Ethnohistorical accounts provide a basis for understanding how Aboriginal people lived prior to the arrival of Europeans and therefore the nature and distribution of archaeological material that is likely to be found in the archaeological record. Such accounts are inherently biased by the cultural norms of the observer and behavioural modifications in response to the awareness of being observed (the so-called 'Hawthorne Effect'). Nevertheless, by comparing and contrasting these observations with archaeological evidence and cultural information from the Aboriginal community, it is possible to establish a general understanding of the lives of Aboriginal people.

The archaeological record provides evidence of the long occupation of Aboriginal people in Australia. Current archaeological record establishes occupation of the Australian mainland by as early as 65,000 years before present (BP) (Clarkson et al. 2017). The oldest date for a site in the Sydney region is at Pitt Town on the Hawkesbury River, approximately 40 km north-west of the present subject site, which is dated to around 36,000 BP (Williams et al. 2014). Older occupation sites along the now submerged coastline would have been flooded around 10,000 years ago, with subsequent occupation concentrating along the current coastlines and rivers (Attenbrow 2010). The archaeological record indicates that Aboriginal people were occupying the region around the subject site well before the arrival of the First Fleet in 1788.

Given the early contact with Aboriginal people in the Sydney region, more is known about these groups than those that inhabited regional areas. The Aboriginal population in the greater Sydney region is estimated to have been between around 4000 and 8000 people at the time of European contact (Attenbrow 2010). The present subject site is located within the traditional lands of the Wangal (also spelt 'Wanegal' or 'Won-gal') people, which extended from Darling Harbour to Parramatta on the southern shores of Port Jackson (Attenbrow 2010:26).

Like Aboriginal people throughout Australia, the Wangal employed stone tools for everyday tasks. Stone artefacts are common in the archaeological record, partly due to their common use, but also because they are resistant to degradation and therefore survive on the ground surface and in subsurface deposits. Flaked artefacts are typically the most common type of stone artefact encountered, in part due to their long and ubiquitous use, but also due to their high discard rate and the large amount of waste produced during manufacture. Ground edged tools are also known to have been utilised by Aboriginal people in the broader region (Tench 1789) and appear in the archaeological record around 4,000 BP (Attenbrow 2010:102). After European contact, Aboriginal people of the Sydney region continued to manufacture tools, sometimes employing new materials such as bottle glass or ceramics (Attenbrow 2010:103-104).

In addition to stone tools, the Wangal are likely to have utilised the resources afforded by the local forests and waterways. Other materials used by the Wangal, such as bone, may survive in the archaeological record under certain conditions.

Based on the above background, it is possible that similar evidence of Aboriginal occupation will also be present within original and/or intact topsoils within the present subject site.

3.1.2. Declared Aboriginal Places

The NSW State Heritage Inventory (SHI) includes all declared Aboriginal places within NSW, in addition to historic heritage items listed on the State Heritage Register (SHR), listed Interim Heritage Orders (IHOs) and items listed on Local Environment Plans (LEPs) and State Environmental Planning Policies (SEPPs).

A search of the SHI was undertaken on 8 February 2024. The search identified three built heritage items within the curtilage of the subject site and conservation area in which the subject site is located. However, the search did not identify any Aboriginal places within the curtilage of the subject site.

3.1.3. Registered Aboriginal Objects

The Aboriginal Heritage Information Management System (AHIMS) is a database of registered Aboriginal sites in NSW. Each registered Aboriginal site includes one or more site 'features', which may be considered an Aboriginal object under the NPW Act. An Aboriginal site may include one or more site features.

The *Guide to completing the AHIMS Site Recording Form* (OEH 2012) lists 20 different features that may be recorded on AHIMS. The most common site features registered in NSW are artefacts, modified trees, art, grinding grooves and shell deposits (see Glossary for definitions). However, the likelihood of any particular site feature being found will vary according to region and environment. Less common site features that are encountered are burials, ceremonial rings, earth mounds, fish traps, habitation structures, hearths, non-human bone and organic material, ochre quarries, stone arrangements and stone quarries (see Glossary for definitions).

Other Aboriginal site features that are recorded on AHIMS but are not necessarily 'Aboriginal objects' within the meaning of that term as it is defined in the NPW Act (i.e. are not a 'deposit, object or material evidence... relating to the Aboriginal habitation of the area') are potential archaeological deposits (PADs), Aboriginal ceremony and dreaming sites, Aboriginal resource and gathering sites, conflict sites and waterholes (see Glossary for definitions). These features are only considered to be 'Aboriginal objects' for the purpose of the NPW Act if accompanied by at least one of the other site types defined above.

The AHIMS database also provides information on the context of registered Aboriginal sites. Sites that are recorded as 'closed' contexts are those that include a cave or rock overhang, while all other sites are recorded as 'open' context.

It should be noted that the AHIMS register does not represent a comprehensive list of all Aboriginal objects or places as it is limited to sites that have been previously identified and registered. Registration is typically the result of previous archaeological investigation, so the number of registered Aboriginal sites in area is dependent on the amount of such research previously undertaken.

A search of the Aboriginal Heritage Information Management System (AHIMS) was carried out on 1 February 2024 (AHIMS Client Service IDs: 860009 and 860010) for an area of approximately 10 km x 10 km centred on the subject site. The Basic and Extensive AHIMS search results are included in Appendix A.

The search was undertaken to determine if:

- There are any registered Aboriginal sites registered within the curtilage of the subject site.
- There are any registered Aboriginal sites near the subject site that might extend into it.
- There is any association of Aboriginal sites certain landscape features within the broader region that may be instructive for determining the likelihood of Aboriginal sites within the subject site.

A total of 58 Aboriginal sites are registered in the search area. Of those registered Aboriginal sites, two are recorded as 'not a site' in the search results, reducing the total number of identified Aboriginal site to 56. The locations of the 56 identified Aboriginal sites are shown in Figure 4.

The search of the AHIMS database did not identify any Aboriginal sites within the curtilage of the subject site.

The nearest Aboriginal site to the present subject site is a low-density artefact scatter (AHIMS # 45-6-3906), which is located approximately 1.5 km to the north-east (Figure 4). It is unlikely that any registered Aboriginal sites in the area would be of sufficient extent to overlap with the present subject site. There is therefore no indication on AHIMS that any registered Aboriginal sites are located within or extend into the subject site.

A summary of all previously registered Aboriginal objects and Aboriginal places within the search area is provided in Table 11. Among the 56 registered Aboriginal sites in the search area, a total of 62 site features were identified of six different types: art, artefact, burial, grinding grooves, potential archaeological deposit (PAD) and shell. Of the sites features that are confirmed Aboriginal objects sites (i.e. excluding PADs), shell and artefact sites were by far the most common, representing 80% of all site features and being found in 89% of all registered sites. Art sites, burials and grinding grooves are represented but are not common in local region.

A relatively large number of registered Aboriginal sites, approximately 32%, are located in a closed context (Table 11). All closed context sites are located along the foreshore of Port Jackson, where outcrops of Hawkesbury sandstone are common. No closed context sites are located in the vicinity of the subject site.

It is clear from Figure 4 that registered Aboriginal sites in the region around the subject site are predominantly associated with major waterways, particularly the shoreline of Port Jackson and the Parramatta River and along the Cooks River, which evidently formed an important part of the lives of local Aboriginal people. These associations are consistent with the general predictive model for NSW, which considers waterways to be indicative of likely past Aboriginal land use (see Section 3.4.1 below).

Table 11 – Summary of registered Aboriginal sites in the AHIMS search area

Site Features	Number			Representation	
	<i>Open Context</i>	<i>Closed Context</i>	<i>Total</i>	<i>% of Total Sites</i>	<i>% of Total Features</i>
Shell	25	13	38	68%	61%
Artefact	11	1	12	21%	19%
PAD	4	1	5	9%	8%
Art	2	3	5	9%	8%
Burial	1	0	1	2%	2%
Grinding Grooves	1	0	1	2%	2%

3.1.4. Previous Archaeological Investigations

Previous Aboriginal archaeological investigations undertaken within or near to the subject site may provide information about known Aboriginal sites that have not previously registered on the AHIMS database. Additionally, Aboriginal archaeological investigations undertaken in the broader region may provide information on the types of archaeological site features that are likely to occur within the subject site.

3.1.4.1. Investigations of the Subject site

No archaeological reports or other relevant investigations relating directly to the present subject site have been identified.

3.1.4.2. Regional Investigations

A number of archaeological investigations have been undertaken in the broader region around the subject site. The most relevant investigations to the present subject site are summarised below.

Navin Officer (2020) undertook an Aboriginal Cultural Heritage Assessment of a new Science and Learning Building at St Patrick's College, Strathfield, approximately 1.7 km west of the present subject site. The assessment included a desktop assessment and archaeological survey of the study area. The desktop assessment identified no known Aboriginal objects or places within the study area or landforms and determined that there was nil–low Aboriginal archaeological potential. The findings of the archaeological survey were consistent with the desktop assessment, with no Aboriginal objects or areas of archaeological potential being found. It further confirmed that the study area had undergone substantial historical ground disturbance that is likely to have removed any Aboriginal archaeological material.

EcoLogical Australia (2019) undertook an Aboriginal Cultural Heritage Assessment of the Meriden School for Girls, Strathfield, approximately 300 north-west of the present subject site. The assessment included desktop assessment and archaeological survey of the study area. The assessment identified heavy disturbance across the study area. On the basis of the desktop assessment and survey the archaeological potential of the study area was assessed to be nil to low.

Of relevance to the present subject site, it is apparent from the above reports that in the context of the local landscape, the impacts associated with the construction and running of a school campus are likely to have a significant negative impact on the retention of Aboriginal archaeological material.

3.1.5. Existing Predictive Models

Predictive models are used to determine the likelihood of Aboriginal archaeological material being located within a particular area. A review of existing predictive models relevant to the region around subject site is relevant for formulating a predictive model for the present assessment.

The *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010c) ('The Due Diligence Code') provides an overarching predictive model for the entirety of NSW. The Due Diligence Code specifies the following 'relevant landscape features' that are considered indicative of likely past Aboriginal land use:

- Areas within 200 m of waters including freshwater and the high tide mark of shorelines.
- Areas located within a sand dune system.
- Areas located on a ridge top, ridge line or headland.
- Areas located within 200 m below or above a cliff face.
- Areas within 20 m of or in a cave, rock shelter, or a cave mouth.

In addition to the statewide predicate model provided in the Due Diligence Code, several specific predictive models have been developed for the region around the present subject site.

- Navin Officer (2020) identified the following factors that are predictive of Aboriginal archaeological potential in the Strathfield area:
 - The potential for identification and survival of archaeological sites will largely be dependent on the degree of past disturbance.
 - Landform and proximity to water are key factors in predicting archaeological site location.

- Subsurface archaeological deposits may occur where natural soil horizons are preserved.
- Closed sites and shell sites (middens) are only likely in areas of Hawkesbury Sandstone adjacent to estuaries.
- Artefact Heritage (2020) produced a model for Parramatta, Cumberland, Canada Bay, Burwood, and Inner West Local Government Areas, which the following predictions:
 - The survivability of Aboriginal objects would be largely dependent on the extent and nature of subsequent phases of historical construction activities.
 - Sub-surface artefact sites tend to consist of lower density isolated occurrences in areas away from major watercourses.
 - More frequent and higher concentrations of sub-surface artefact sites are likely to occur in the vicinity of major watercourses.
 - Shell midden sites are more likely to be identified in close proximity to marine and estuarine areas.
 - Sandstone shelters suitable for archaeological deposit and outcrops suitable for engravings may be preserved in ridge crests and ridge slope landform contexts.

3.2. ENVIRONMENTAL CONTEXT

The environment context of the subject site encompasses the natural landscape and the impacts of historical human activity. These aspects of the environmental context are relevant to predicting the potential for unknown Aboriginal objects occurring within the subject site.

3.2.1. Natural Landscape

The purpose of reviewing the natural landscape of the subject site is twofold. It assists in the prediction of the intensity and nature of Aboriginal land use and deposition of archaeological material in the subject site by considering the landforms and resources that would have played a part in the everyday lives of Aboriginal people. It also assists in the determining the likelihood that those material remains would have survived any natural geomorphological process or historical ground disturbance (discussed in Section 3.2.2 below).

Topography: The subject site is located on a lower slope of broad low ridge (Figure 5).

Soils and Geology: The NSW Soil and Land Information System (SALIS) indicates that the entire subject site is located within the Blacktown soil landscape (Figure 6). The Blacktown soil landscape is characterised by erosional soils on broad rounded crests and ridges with gently inclined slopes. The soil A-horizon typically comprises friable brownish black loam (A1) overlying hard-setting brown clay loam (A2). A-horizon depths are anticipated to be up to 30 cm of A1 overlaying 10-30 cm of A2 on lower slopes. The underlying geology of the Blacktown soil landscape is the Wianamatta group shales. Rock outcrops are not naturally occurring in the Blacktown soil landscape.

Geomorphic Activity: The mode of geomorphic activity in the subject site is erosion. Natural erosional processes, particularly water erosion, have caused displacement of topsoil and other surface material from across the entire subject site, potentially including archaeological material.

Hydrology: The nearest extant natural water to the subject site is Powells Creek, located approximately 516m north of the subject site (Figure 5). However, a plan of Burwood from c. 1890 (Figure 7) shows the subject site located at the confluence of two former natural creek lines, one of which has evidently been modified by this stage, which likely fed into Powells Creek. The entire subject site within 200 m of at least one of these creeks.

Vegetation: Vegetation within the Blacktown Soil Landscape is typified by open-forest and open-woodland (dry sclerophyll forest). The original woodland and open-forest were dominated by *Eucalyptus tereticornis* (forest red gum), *E. crebra* (narrow-leaved ironbark), *E. moluccana* (grey box) and *E. maculata* (spotted gum). Such species could have been subject to cultural modification.

The relevance of the natural landscape for the present assessment is discussed in the application of the predictive model to determining Aboriginal archaeological potential in Section 3.4.2 below.

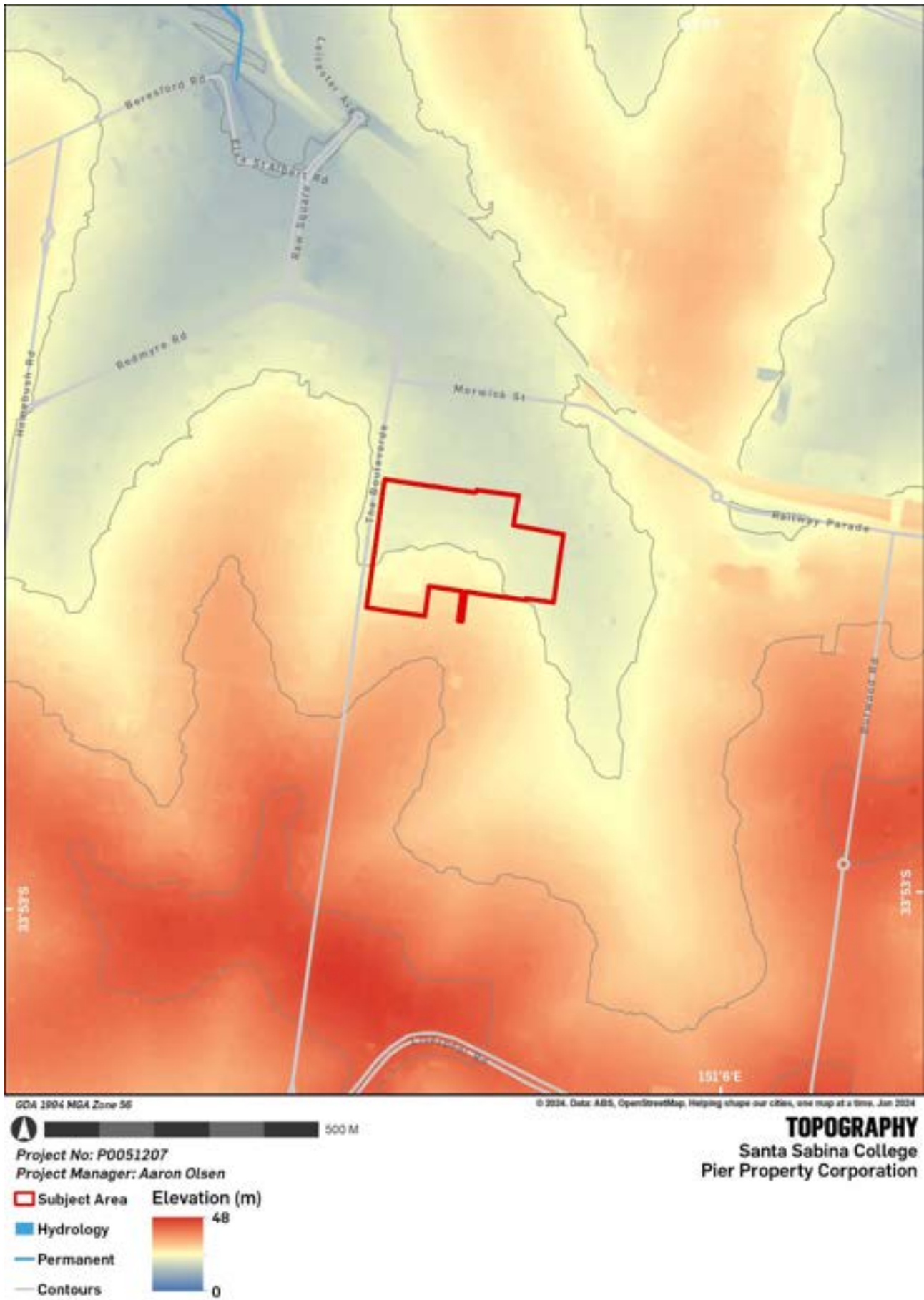


Figure 5 – Topography

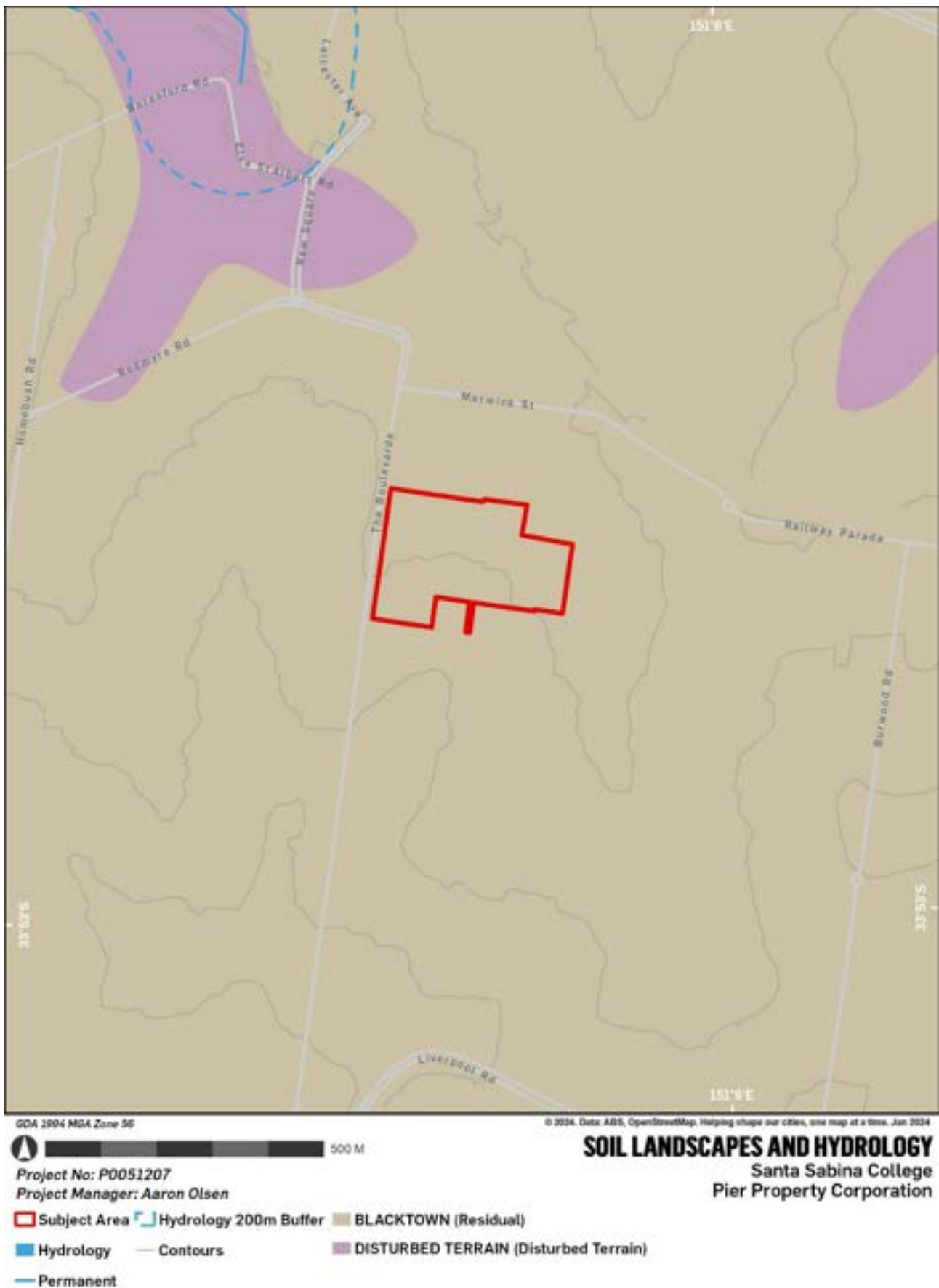


Figure 6 – Soil landscapes and hydrology



Figure 7 – Map of 'Burwood, Parish of Concord' from c. 1890, showing (inset) the subject site (red outline) in relation to location of two former creek lines; the blue shaded area is within 200 m of at least one of the creeks
Source: National Library of Australia, Call No. MAP RaA 40 Plate 13

3.2.2. Historical Ground Disturbance

Disturbance to the natural landscape through human activity (e.g., clearing of vegetation, ploughing and construction of buildings) reduces the likelihood of deposited Aboriginal objects being retained, either through destruction of the Aboriginal objects or their removal. Ground disturbance may affect the natural topsoil (A-horizon), within which subsurface Aboriginal archaeological remains are typically found, and other surface features associated with Aboriginal objects, such as trees, rock platforms and rock overhangs.

For the purpose of the present assessment, historical ground disturbance is rated according to the following scheme:

- **High:** all or most topsoil has been disturbed or removed, with at most only a small part of the lower portion of topsoil possibly remaining intact
- **Moderate:** the upper part of the topsoil has been substantially disturbed or removed, but a substantial amount remains intact
- **Low:** little or no disturbance or removal of topsoil, with all or most topsoil remaining intact

The degree of disturbance is relative to the depth of the natural topsoil. For example, disturbance of the upper 30 cm of a natural soil profile by ploughing may be high if the topsoil only 30 cm deep, but only moderate if the topsoil is 1 m deep.

The land constituting the subject site is located within a 750-acre grant made to Thomas Rowley in 1803 (Land Grant Register, serial 3, page 118), which he named 'Burwood' (Dunlop 2010:15). Rowley was a soldier and farmer who utilised his landholdings for grazing sheep (Dunlop 2010:15; Fletcher 1967). Following Rowley's death, the property was purchased by another sheep grazier, Alexander Riley, in 1812 (Dunlop 2010:16). Following Riley's death in 1833, the entire Burwood Estate was subdivided (Dunlop 2010:26). The present subject site was subdivided in 1835 (Primary Application Numbers 1762 and 7564) and again in 1862 (Primary Application 13769). The property boundaries following subdivision area shown in Figure 8.

Over the course of the 19th century, the properties constituting the subject site changed hands a number of times (Urbis 2024). They were likely used for small scale market gardening or depasturing during this time. By the end of the 19th century, the Strathfield and Burwood areas had become a fashionable area for country villas in the 19th century and the present subject site was no exception, with the construction of Rosary Lodge c. 1870 and Holyrood c. 1890, both fronting The Boulevarde (Urbis 2024). With development of the area as a residential neighbourhood, a portion of the natural waterway through the subject site had been converted to an underground pipeline by the 1890s.

In 1893, the Catholic Church purchased several parcels of land centred on Rosary Lodge, establishing a Dominican convent and school for girls (The Daily Telegraph 1894). The school expanded its holdings to the present extent of the subject site during the 20th century. An aerial photograph of the subject site from 1930 shows that by this time a number of the extant buildings were already present, in addition to a number of other now-demolished buildings (Figure 9). Among the earlier buildings was a building within the footprint of the extant Siena Hall, which was likely an earlier school hall building. Several rectilinear features are also present within the area proposed impact, which are likely either sports fields or gardens.

By 1943, a small outbuilding had been constructed to the west of the location of the extant pool, while further gardens or sports fields were present to the north (Figure 10). By 1982, Siena Hall and the extant pool had been built (Figure 11). A current aerial image shows further landscaping in the area of the pool and Siena Hall (Figure 2).

Ground disturbance is assessed to be **high** across the entire subject site in view of the shallow natural topsoil and evidence of land clearance, grazing, construction of buildings, earthworks (e.g. construction of playing fields and landscaping) and installation of underground services. The assessed ground disturbance for the present subject site is mapped in Figure 12.

A geotechnical investigation was undertaken by Douglas Partners (2024), which consisted of sixteen boreholes and two test pits to the east of the main school buildings in the area of the existing pool (Figure 12). The investigation found a layer of fill (comprising gravelly/silty/clayey sand, silty clay and clay) overlaying residual silty clay in all boreholes and test pits. The fill layer extends to a depth of between 0.4 and 1.7 m. The geotechnical investigation found no evidence of natural topsoil.

The relevance of historical ground disturbance for the present assessment is discussed in the application of the predictive model to determining Aboriginal archaeological potential in Section 3.4.2 below.

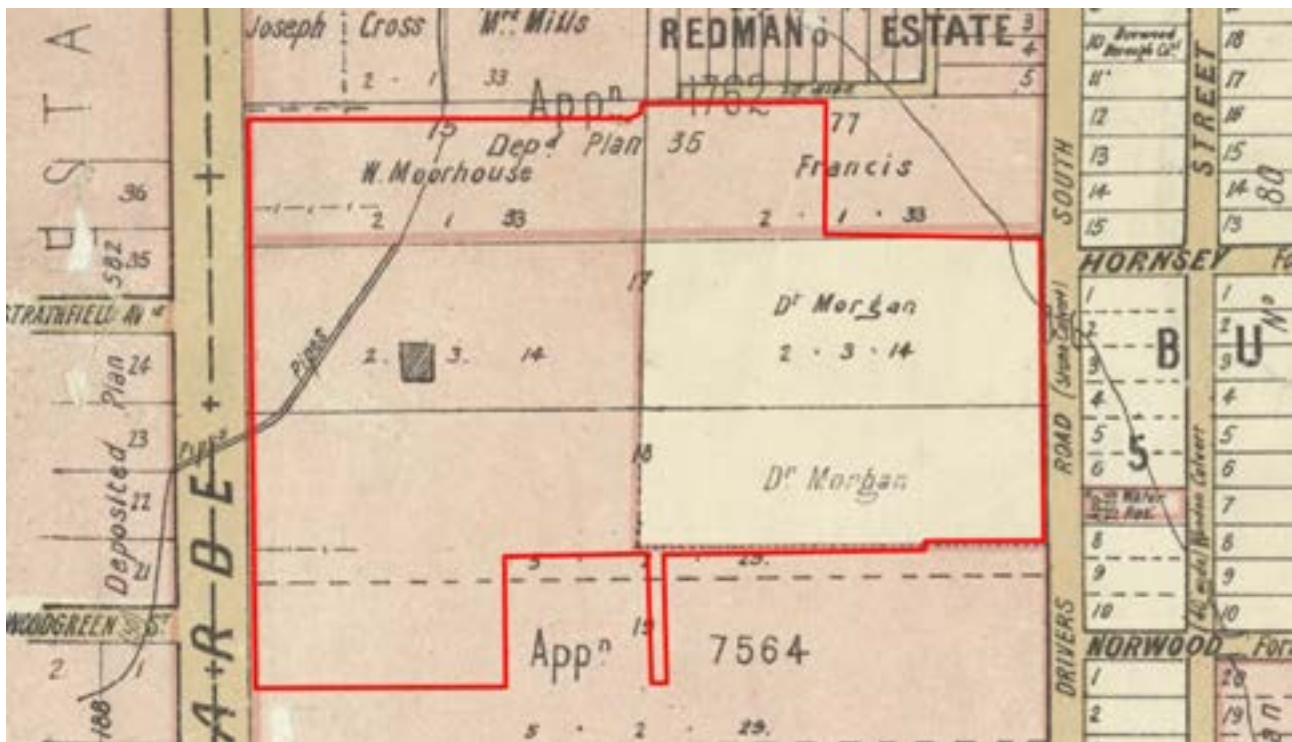


Figure 8 – Detail of 'Map of the municipality of Burwood, parish of Concord, c. 1893, showing location of subject site (red outline)

Source: State Library of NSW, Call No. Z/M4 811.1836/1893/1



Figure 9 – Aerial image of subject site (red outline), 1930, showing areas of proposed impact (yellow outlines) forming the development site

Source: NSW Government, Historical Imagery Viewer



Figure 10 – Aerial image of subject site (red outline), 1943, showing areas of proposed impact (yellow outlines)

Source: NSW Government, Historical Imagery Viewer



Figure 11 – Aerial image of subject site (red outline), 1982, showing areas of proposed impact (yellow outlines)

Source: NSW Government, Historical Imagery Viewer



GOA 2004 MGA Zone S6

© 2024, Data: ABS, OpenStreetMap, Esri/Mapbox, Microsoft, Google, and others, data from a 2024 Jan 2024



Project No: P0051207

Project Manager: Aaron Olsen

■ Subject Area
 ● Borehole
 ● Test Pit
 ■ High Ground Disturbance
 ■ Area of Proposed Impact

GROUND DISTURBANCE

Santa Sabina College
Pier Property Corporation

Figure 12 – Historical ground disturbance

3.3. LOCAL & REGIONAL CHARACTER

The evidence from Sections 3.1 and 3.2 is synthesised below to highlight the main issues and regional character of Aboriginal land use and the material traces that it has produced, in accordance with Requirement 11 of the Code of Practice.

Archaeological evidence indicates that Aboriginal land use in the local area and region is heavily reliant on waterways, particularly Port Jackson, the Parramatta River and Cooks River. Stone tools are likely to have played a significant role in the lives of the local Aboriginal people, with lithic artefacts being strongly represented in the known archaeological record. Lithic artefacts are likely to have been discarded near waterways, with higher densities likely occurring near major waterways where land use was likely more intensive. Other evidence of occupation is also focussed on waterways, such as burials art and grinding grooves, all of which may be associated with the rock overhangs and outcrops of Hawksbury sandstone that occur along major waterways in the region.

3.4. ARCHAEOLOGICAL POTENTIAL

The Aboriginal archaeological potential of an area is the likelihood that it retains material evidence of past Aboriginal land use. The purpose of undertaking an assessment of Aboriginal archaeological potential is to inform the sampling strategy for the subsequent archaeological survey, to determine if an archaeological test excavation is required and, if so, inform the sampling strategy for that excavation.

3.4.1. Predictive Model

A predictive model for the present assessment has been formulated based on existing predictive models (Section 3.1.5) and the local and regional character summarised above (Section 3.3).

Aboriginal archaeological potential is further dependent on erosional transport and historical ground disturbance. Archaeological material is more likely to accumulate in aggraded landforms than eroded landforms, while higher ground disturbance reduces the likelihood of archaeological material surviving. Subsurface archaeological deposits may occur where natural soil A-horizons are preserved.

Synthesising the above predictors, Aboriginal archaeological potential is rated according to the following scheme:

- **Very High:** at least one relevant landscape feature, low ground disturbance and an aggraded landform
- **High:** at least one relevant landscape feature and either: (i) low ground disturbance and an eroded landform; or (ii) moderate ground disturbance and an aggraded landform
- **Moderate:** at least one relevant landscape feature, moderate ground disturbance and an eroded landform
- **Low:** no relevant landscape features and low or moderate ground disturbance
- **Very Low:** high ground disturbance

Expected site features are based on the following associations landscape features:

- High density sub-surface artefact sites are likely to occur in the vicinity of major watercourses, while low density sub-surface artefact sites are more likely in areas away from major watercourses.
- Shell midden sites are more likely to be identified in close proximity to marine and estuarine areas.
- Closed sites and rock engravings (art sites) are only likely in areas of exposed Hawkesbury sandstone.

The predictive model described above is applied in the following section to determine the Aboriginal archaeological potential of the subject site and likely site features.

3.4.2. Assessment of Potential

Based on the predictive model outlined in the preceding section, the archaeological potential of the present subject site is assessed as follows.

The entire subject site is located within 200 m of a natural waterway (Section 3.2.1), which is considered indicative of likely past Aboriginal land use under the predictive model presented in the preceding Section.

Based on known Aboriginal sites in the region, that land use is most likely to be materially manifested as low-density subsurface deposits and surface scatters of discarded stone artefacts.

Ground disturbance across the entire subject site is assessed to be high (Section 3.2.1). Natural erosional processes are likely to have depleted natural topsoils and inhibited accumulation of archaeological material across the subject site. However, subsequent human activity, including land clearance, grazing, construction of buildings, earthworks (e.g. construction of playing fields and landscaping) and installation of services in shallow topsoil. Intact natural topsoils are therefore unlikely to be present anywhere within subject site. A geotechnical assessment to the east of the main school buildings in the area of the existing pool was consistent with the assessment of high disturbance, finding no evidence of natural topsoil.

Synthesising the above factors according to the archaeological rating scheme presented in the preceding section, it is determined that Aboriginal archaeological potential is **Very Low** across the entire subject site. It is highly unlikely that the subject site would retain any Aboriginal objects. The assessed archaeological potential of the subject site is mapped in Figure 13.

The assessment of very low potential is consistent with other properties in the local area that have been subject to similar development and use (EcoLogical 2019; Navin Officer 2020).

3.5. SUMMARY

The desktop assessment of the subject site is summarised as follows:

- No known Aboriginal objects or Aboriginal places have been identified that are within, or likely to be within, the curtilage of the subject site.
- The entire subject site is located within 200 m of at least one former natural creek, which is considered indicative of likely past Aboriginal land use.
- Ground disturbance is assessed to be high across the entire subject site in view of evidence of land clearance, grazing, construction of buildings, earthworks (e.g. construction of playing fields and landscaping) and installation of services in shallow topsoil and further in view of geotechnical investigations which indicate an absence of topsoil across a large part of the subject site.
- In view of the high ground disturbance across the entire subject site, the Aboriginal archaeological potential of the entire subject site is assessed to be **Very Low**.



Figure 13 – Aboriginal archaeological potential

4. VISUAL INSPECTION

A visual inspection of the subject site was undertaken on 19 March 2024 by Ginger-Rose Harrington (Urbis Archaeologist), [REDACTED] and [REDACTED].

The visual inspection was confined to the areas of proposed impact around Siena Hall and in the area of the existing pool and playing courts (Figure 2, Figure 12 and Figure 13). The visual inspection was undertaken to confirm the assessment of archaeological potential within the subject site and to determine if any Aboriginal objects were present as surface expressions.

The visual inspection was undertaken in sunny conditions. Ground Surface Visibility ('GSV') was estimated to be about 10% across the subject site. Visibility was obscured by the presence of buildings, sports facilities, roads, gardens and grass cover (Figure 14 to Figure 17). Visible areas were limited to small areas in garden beds and the base of trees (Figure 18 and Figure 19).

No Aboriginal objects were identified during the visual inspection of the subject site.

Pieces of imported sandstone were observed across the subject site, which were evidently imported for use in landscaping (Figure 20). No cultural markings were identified any of the sandstone pieces. A small piece of ochre was identified amongst imported sandstone in a garden bed to the east of Siena Hall (Figure 21). However, this was clearly in a disturbed context and showed no signs of being worked.

Observations made during the visual inspection were consistent with the desktop assessment of a high level of ground disturbance across the subject site. The presence of buildings, sports fields and structures, roads and landscaping across almost the entire area of proposed impact attest to extensive historical impacts to the natural topsoil. Level changes were also observed in the areas around Siena Hall and the existing pool and multi-purpose courts (Figure 22 and Figure 23), indicative of earthworks having been undertaken. Underground service connections and drainage are visible across the inspected area (Figure 15). Areas of surface sand were observed in the vicinity of the multi-purpose courts to the north of the multi-purpose courts. The bleached colour and consistent texture of the sand is indicative of imported material used as top-dressing for the turf.

The observations made during the visual inspections are consistent with the desktop assessment of high ground disturbance across the entire area of proposed impact.



Figure 14 – View south of landscaping to the east of Siena Hall (building in background is outside area of proposed impact)



Figure 15 – View south of paved roadway, landscaped garden bed and underground service location to the west of Siena Hall



Figure 16 – View east showing pathway between Siena Hall (right) and Rosary Lodge (left)



Figure 17 – View north of bitumen roadway and multi-purpose playing court



Figure 18 – Garden bed with small areas of visible ground surface adjacent Siena Hall



Figure 19 – Small area of visible ground surface at base of tree to the east of multi-purpose courts (north of existing pool)



Figure 20 – Imported sandstone pieces used as garden bed edging to adjacent Siena Hall with no signs of cultural markings



Figure 21 – Unworked piece of ochre located amongst imported sandstone in a garden bed to the east of Siena Hall



Figure 22 – Level change evident between existing pool (left) and multi-purpose courts (right)



Figure 23 – Level change evident between Siena Hall (left) and Rosary Lodge (right)

5. SIGNIFICANCE ASSESSMENT

The following is an assessment and discussion of the cultural significance of the subject site, made in consultation with the RAPs. The assessment follows principles and procedures outlined in the Burra Charter the Assessment Guidelines.

5.1. FRAMEWORK FOR ASSESSMENT

The Burra Charter defines cultural significance as being derived from the following values: social or cultural value, historic value, scientific value and aesthetic value. Aesthetic, historic, scientific and social values are commonly interrelated. All assessments of heritage values occur within a social and historic context. Therefore, all potential heritage values will have a social component.

Heritage significance is assessed by considering each cultural or archaeological site against the significance criteria set out in the Assessment Guidelines. The Assessment Guidelines require that the assessment and justification in a statement of significance includes a discussion of whether any value meets the following criteria:

- Does the subject site have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons? – social value.
- Is the subject site important to the cultural or natural history of the local area and/or region and/or state? – historic value.
- Does the subject site have potential to yield information that will contribute to an understanding of the cultural or natural history of the local area and/or region and/or state? – scientific (archaeological) value.
- Is the subject site important in demonstrating aesthetic characteristics in the local area and/or region and/or state? – aesthetic value.

Assessment of each value should be graded in terms that allow the significance to be described and compared (e.g. high, moderate, or low). In applying these criteria, consideration should be given to:

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

The Aboriginal heritage significance of the subject site is assessed in the following section within the framework outlined above.

5.2. ASSESSMENT OF HERITAGE VALUES

The following assessment of the social or cultural, historic, scientific and aesthetic values of the subject site has been prepared in accordance with the Assessment Guidelines.

In acknowledgment that the Aboriginal community themselves are in the best position to identify heritage values, the assessment is informed by consultation with the Aboriginal community undertaken as part of the ACHA (Section 2 above).

5.2.1. Social or Cultural Value

Social or cultural value encompasses the qualities for which a place has become a focus of spiritual, political, national or other cultural sentiment for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them. Places of social or cultural value have associations with contemporary community identity. These places can have associations with tragic or warmly remembered experiences, periods, or events. Communities can experience a sense of loss should a place of

social or cultural value be damaged or destroyed. Social or cultural values can therefore only be identified through consultation with Aboriginal people.

Comments relevant to the social or cultural value of the subject site were received from two of RAPs during Stages 2 and 3 of the consultation process.

[REDACTED]

[REDACTED]

[REDACTED] made the following comments during the site visit and meeting:

[REDACTED]

[REDACTED]

In view of the above feedback, the subject site is assessed as having social and cultural value to the Aboriginal community for its connection to the broader cultural landscape around the subject site, including cultural pathways and sacred sites, and for the long connection Aboriginal people have with the area.

5.2.2. Historic Value

Historic value encompasses the history of aesthetics, science and society. A place may have historic value because it is associated with a historic figure, event, phase or activity in an Aboriginal community. The significance of a place will be greater where evidence of the association or event survives in situ, or where the settings are substantially intact, than where it has been changed or evidence does not survive. However, some events or associations may be so important that the place retains significance regardless of subsequent treatment. Places may also have 'shared' historic values with other (non-Aboriginal) communities.

No historical associations between Aboriginal people and the subject site have been identified. The subject area is therefore unlikely to have historic value insofar as it relates to Aboriginal cultural heritage.

5.2.3. Scientific (Archaeological) Value

Scientific value relates to the importance of a landscape, area, place or object because of its rarity, representativeness and the extent to which it may contribute to further understanding and information. Information about scientific value will be gathered through any archaeological investigation undertaken.

The subject site is highly unlikely to retain any Aboriginal objects due to a high level of historical ground disturbance. Furthermore, if any Aboriginal objects are present, they are likely to be located within a highly disturbed context. The scientific (archaeological) value of the subject site is therefore assessed to be low.

Should any Aboriginal objects be identified within the subject site, the scientific (archaeological) value of those objects and the subject site should be reassessed.

5.2.4. Aesthetic Value

Aesthetic value of a place relates to the sensory, scenic, architectural and creative aspects of a place. It may include visual aspects, such as form, scale, colour, texture and material of the fabric, and the smells and sounds associated with the place and its use.

It is evident that the subject site is highly disturbed through land clearance, grazing, construction of buildings, earthworks (e.g. construction of playing fields and landscaping) and installation of services in shallow topsoil. The present visual appearance and other sensory aspects of the subject site are unlikely to resemble those of the landscape of the local area as it existed prior to European contact. The subject site is therefore unlikely to have aesthetic value insofar as it relates to Aboriginal cultural heritage.

Individual Aboriginal objects may have aesthetic value in their own right. There are no known Aboriginal objects within the subject site that could be assessed for aesthetic value. In the event that any Aboriginal objects are identified within the subject site during the proposed works, these should be assessed for aesthetic value.

5.3. STATEMENT OF SIGNIFICANCE

The subject site is assessed as having social and cultural significance to Aboriginal people. Based on comments received from RAPs during the consultation process, the subject site evidently has social and cultural value to the Aboriginal community for its connection to the broader cultural landscape around the subject site and for the long connection Aboriginal people have with the area. However, no Aboriginal sites or evidence of a specific cultural association with the subject site itself have been identified. Furthermore, the high level of ground disturbance in the subject site, due to land clearance, grazing, construction of buildings, earthworks (e.g. construction of playing fields and landscaping) and installation of services, is likely to have diminished any social and cultural value. Therefore, although the social and cultural value of the subject site is acknowledged, the Aboriginal heritage significance of the subject site itself is graded as low.

The assessment of significance should be updated in the event that any Aboriginal objects are found within the subject site during the proposed works.

6. IMPACT ASSESSMENT

The following is an assessment of the potential impact of the proposed development on any Aboriginal objects and/or Aboriginal places within the subject site and the possible strategies for avoiding or minimising harm to those Aboriginal objects and/or Aboriginal places.

6.1. FRAMEWORK FOR ASSESSMENT

The potential harm to Aboriginal objects and Aboriginal places that is likely to be caused by a proposed activity is the effect of that activity on the Aboriginal heritage values identified above. According to the NPW Act, 'harm' to an object or place includes any act or omission that:

- Destroys, defaces, or damages the object or place.
- Moves the object from the land on which it had been situated.
- Causes or permits the object or place to be harmed.

Harm does not include something that is trivial or negligible, such as picking up and replacing a small stone artefact, breaking a small Aboriginal object below the surface when you are gardening, crushing a small Aboriginal object when you walk on or off a track, picnicking, camping or other similar recreational activities.

The Assessment Guidelines define harm to Aboriginal objects and Aboriginal places as being either 'direct' or 'indirect':

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

The present assessment of potential harm follows the principles of ecologically sustainable development (ESD), in particular the precautionary principle and the principle of inter-generational equity:

- The **precautionary principle** states that full scientific certainty about the threat of harm should never be used as a reason for not taking measures to prevent harm from occurring.
- The **principle of inter-generational equity** holds that the present generation should make every effort to ensure the health, diversity and productivity of the environment, which includes cultural heritage, is available for the benefit of future generations. If a site type that was once common in an area becomes rare, the loss of that site (and site type) will result in an incomplete archaeological record and will negatively affect intergenerational equity.

Consideration of potential harm to Aboriginal objects and Aboriginal places according to ecologically sustainable development (ESD) principles allows for an understanding of the cumulative impact of the proposed activity and an understanding of how harm can be avoided or minimised, if possible.

6.2. ASSESSMENT OF POTENTIAL HARM

The assessment of potential harm considers harm that may occur to both known Aboriginal objects and as yet unknown Aboriginal objects within the subject site.

The desktop assessment and site inspection identified no known Aboriginal objects within the subject site. Furthermore, due to high a level of disturbance across the entire subject site, it is unlikely that any as yet unknown Aboriginal objects are retained anywhere within the subject site. Therefore, any physical works within the development site or the overall subject site, including those presently proposed (Section 1.2), are unlikely to cause either direct or indirect harm to Aboriginal objects.

6.3. INTER-GENERATIONAL EQUITY

The cumulative impact of any development on Aboriginal sites relates to the extent of the proposed impact on the development site and how this will affect both the proportion of this type of Aboriginal site in the area and the impact this destruction will have on Aboriginal cultural heritage values generally in the area.

As there are now known Aboriginal objects within the subject and there is very low potential for unknown Aboriginal objects to be retained, the proposed works are unlikely to negatively impact inter-generational equity.

6.4. AVOIDANCE & MINIMISATION OF HARM

All practicable measures must be taken to avoid harm (i.e. protect and conserve) any significant Aboriginal objects within the subject site along with their cultural heritage values. The precautionary principle states that full scientific certainty about the threat of harm should never be used as a reason for not taking measures to prevent harm from occurring.

If harm to Aboriginal objects and/or Aboriginal places is unavoidable, management strategies must be considered to minimise the harm. The type of management strategies proposed must be appropriate to the significance of Aboriginal heritage values, Aboriginal objects and/or Aboriginal places. Harm avoidance and minimisation measures must be feasible and within the financial viability of the proposed activity.

As it is unlikely that any Aboriginal archaeological material is retained within the subject site, no further archaeological investigation is recommended for the present subject site. As precautionary measures, it is recommended that unexpected archaeological finds and human remains procedures described below be implemented.

6.4.1. Unexpected Archaeological Finds Procedure

To mitigate harm to any unknown Aboriginal objects within the subject site, it is recommended that the following unexpected archaeological finds procedure should be followed in the unlikely event that any archaeological material, or suspected archaeological material, is uncovered during any works within the subject site:

1. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW, preparation of a research design and archaeological investigation/salvage methodology and registration of the find with the Aboriginal Heritage Information Management System (AHIMS). Any management measures should be decided upon consultation with the RAPs.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject site may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

6.4.2. Human Remains Procedure

To mitigate harm to any unknown Aboriginal burial sites within the subject site, it is recommended that the following human procedure should be followed in the unlikely event that any clearly identifiable human remains, or suspected human remains, are uncovered during any works within the subject site:

1. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW.

3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

In the event that bones are uncovered which may be human but cannot be confirmed by onsite staff, a suitably qualified archaeologist or heritage specialist should be contacted in the first instance to determine how to proceed.

7. CONCLUSIONS & RECOMMENDATIONS

The ACHA concluded that:

- **Conclusion 1 – Known Aboriginal Objects and Places**

No known Aboriginal objects or Aboriginal places have been identified that are within, or likely to be within, the curtilage of the subject site.

- **Conclusion 2 – Sensitive Landscape Features**

The entire subject site is located within 200 m of at least one former natural creek, which is considered indicative of likely past Aboriginal land use.

- **Conclusion 3 – Ground Disturbance**

Ground disturbance is assessed to be high across the entire subject site in view of evidence of land clearance, grazing, construction of buildings, earthworks (e.g. construction of playing fields and landscaping) and installation of services in shallow topsoil and further in view of geotechnical investigations which indicate an absence of topsoil across a large part of the subject site.

- **Conclusion 4 – Archaeological Potential**

As the subject site has been subjected to a high level of historical ground disturbance and it is unlikely that any intact natural topsoil remains anywhere in the subject site, the archaeological potential of the subject site is assessed to be Very Low.

- **Conclusion 5 – Significance Assessment**

The subject site is assessed as having low Aboriginal cultural heritage significance for its connection to the broader cultural landscape around the subject site and for the long connection Aboriginal people have with the area, noting that there is no evidence of a specific Aboriginal association with the subject site and the high level of ground disturbance in the subject site is likely to have diminished any social and cultural value.

Conclusion 6 – Impact Assessment

As there are no known Aboriginal objects within the subject site and it is unlikely to retain any as yet unknown Aboriginal objects, the proposed physical works are unlikely to cause either direct or indirect harm to Aboriginal objects or negatively impact inter-generational equity.

Based on the above conclusions, Urbis recommends the following:

- **Recommendation 1 – Submission of Report**

A copy of this report should be submitted with the Environmental Impact Statement (EIS) in support of SSD-68054209.

- **Recommendation 2 – No Further Archaeological Investigation**

As the proposed works are unlikely to cause harm to Aboriginal objects, it is recommended that no further investigation is required for the present development. The proposed development can proceed in line with the Archaeological Unexpected Finds Procedure and Human Remains Procedure outlined below.

- **Recommendation 3 – Unexpected Archaeological Finds Procedure**

Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.

3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Such management may require further consultation with Heritage NSW, preparation of a research design and archaeological investigation/salvage methodology and registration of the find with the Aboriginal Heritage Information Management System (AHIMS).
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject site may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

▪ **Recommendation 4 – Human Remains Procedure**

Should any clearly identifiable human remains, or suspected human remains, be uncovered during any works within the subject site:

6. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment.
7. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW.
8. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
9. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
10. Works are not to recommence until the find has been appropriately managed.

In the event that bones are uncovered which may be human but cannot be confirmed by onsite staff, a suitably qualified archaeologist or heritage specialist should be contacted in the first instance to determine how to proceed.

8. REFERENCES

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APPENDIX A

**BASIC AND EXTENSIVE AHIMS
SEARCH RESULTS**

APPENDIX B

**REGISTERED ABORIGINAL PARTY
CONSULTATION LOG**

APPENDIX C

REGISTERED ABORIGINAL PARTY CONSULTATION DOCUMENTATION



APPENDIX A

BASIC AND EXTENSIVE AHIMS SEARCH RESULTS



Urbis Pty Ltd - Angel Place L8 123 Pitt Street

Date: 01 February 2024

Level 8 123 Angel Street

Sydney New South Wales 2000

Attention: Owen Barrett

Email: obarrett@urbis.com.au

Dear Sir or Madam:

AHIMS Web Service search for the following area at Datum :GDA, Zone : 56, Eastings : 318824.0 - 328824.0, Northings : 6244782.0 - 6254782.0 with a Buffer of 0 meters, conducted by Owen Barrett on 01 February 2024.

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:

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

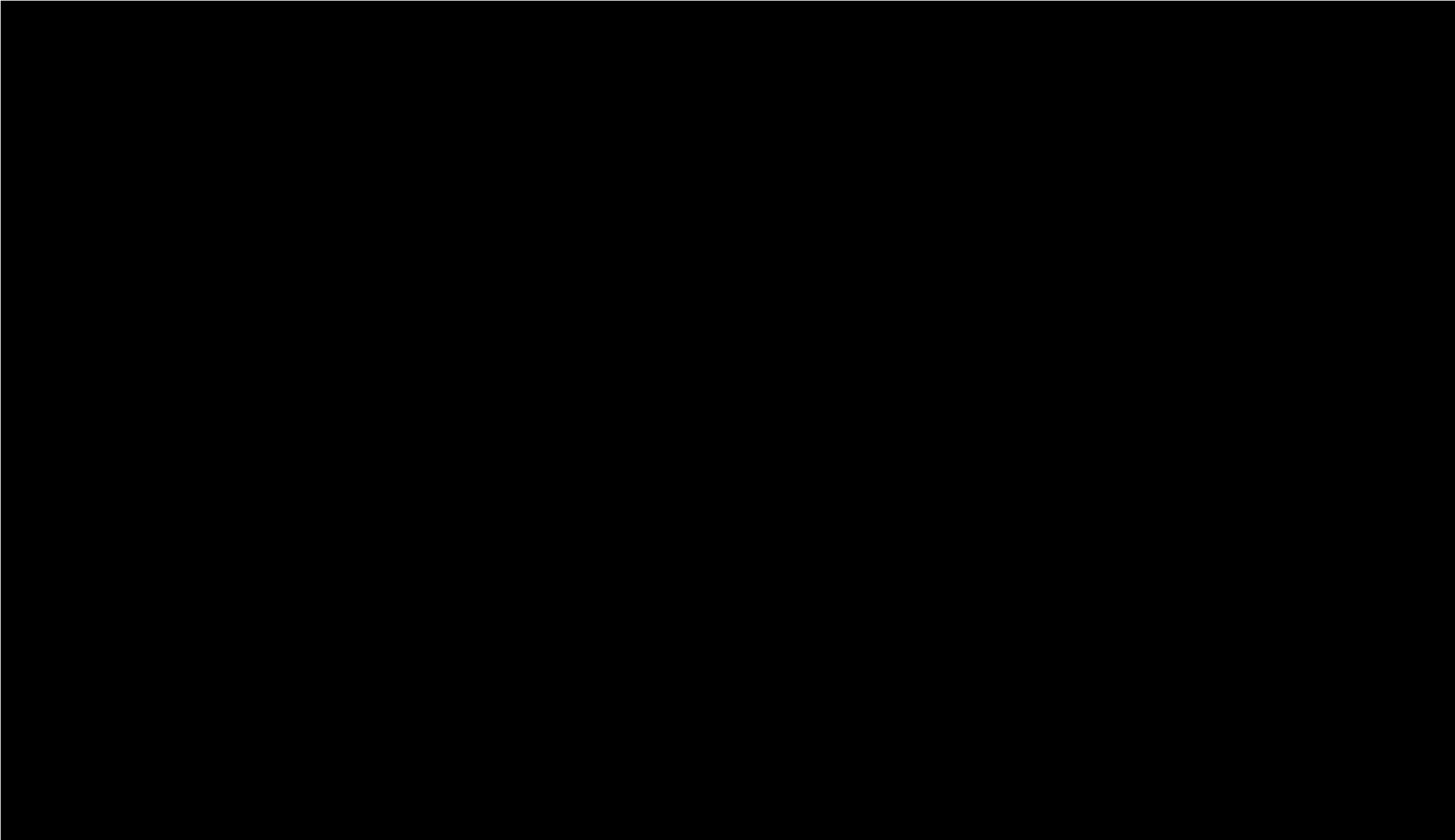


AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Santa Sabina 10x10

Client Service ID : 860010



Report generated by AHIMS Web Service on 01/02/2024 for Owen Barrett for the following area at Datum :GDA, Zone : 56, Eastings : 318824.0 - 328824.0, Northings : 6244782.0 - 6254782.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 58

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





AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Santa Sabina 10x10

Client Service ID : 860010

Report generated by AHIMS Web Service on 01/02/2024 for Owen Barrett for the following area at Datum :GDA, Zone : 56, Eastings : 318824.0 - 328824.0, Northings : 6244782.0 - 6254782.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 58

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Santa Sabina 10x10
Client Service ID : 860010

SitelD	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Santa Sabina 10x10

Client Service ID : 860010

<u>SiteID</u>	<u>SiteName</u>	<u>Datum</u>	<u>Zone</u>	<u>Easting</u>	<u>Northing</u>	<u>Context</u>	<u>Site Status **</u>	<u>SiteFeatures</u>	<u>SiteTypes</u>	<u>Reports</u>
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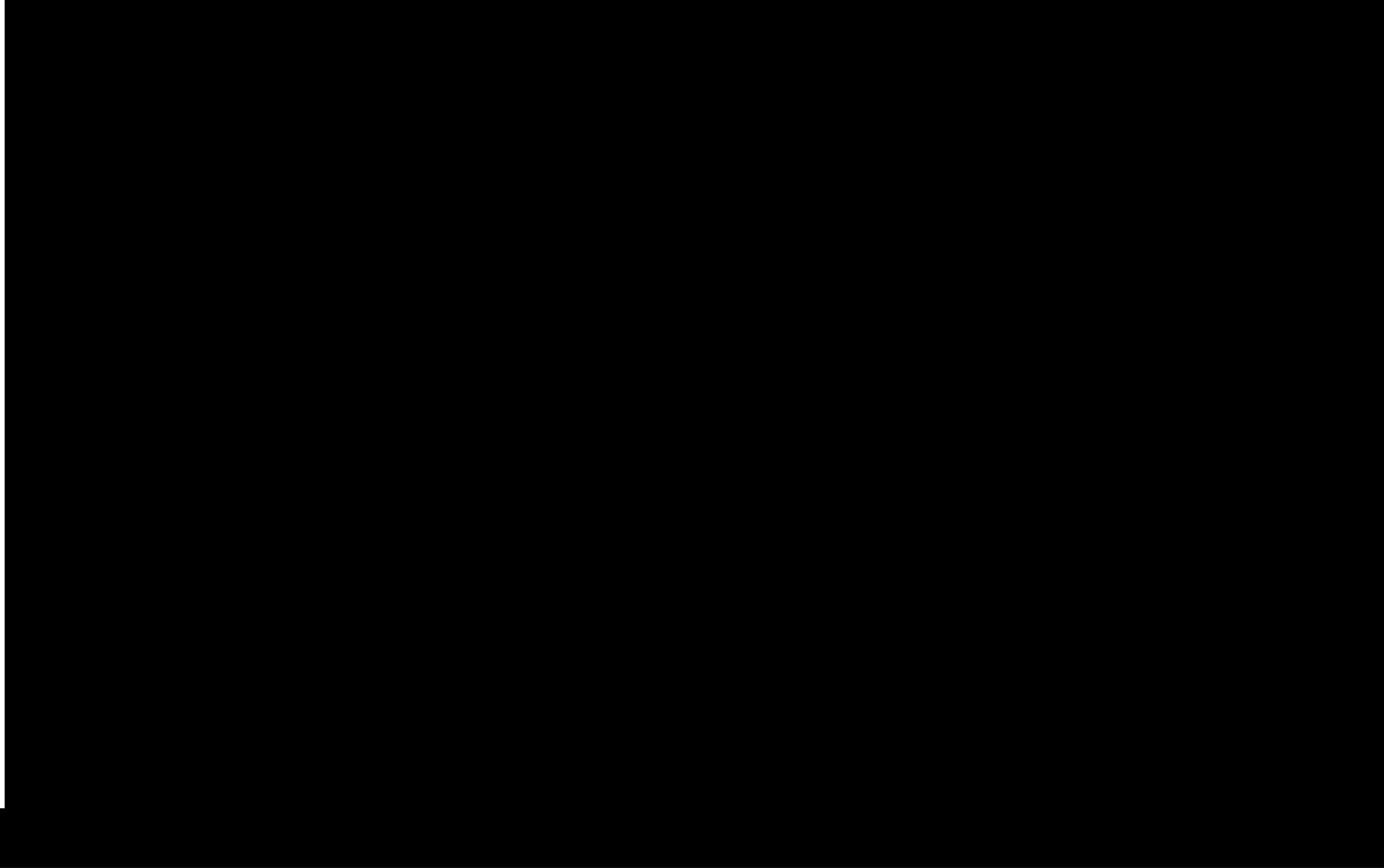
**** Site Status**
Valid - The site has been recorded and accepted onto the system as valid
Destroyed - The site has been completely impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There is nothing left of the site on the ground but proponents should proceed with caution.
Partially Destroyed - 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 after further investigations it was decided it is NOT an aboriginal site. Impact of this type of site does not require permit but Heritage NSW should be notified

Report generated by AHIMS Web Service on 01/02/2024 for Owen Barrett for the following area at Datum :GDA, Zone : 56, Eastings : 318824.0 - 328824.0, Northings : 6244782.0 - 6254782.0
with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 58

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APPENDIX B

REGISTERED ABORIGINAL PARTY CONSULTATION LOG



APPENDIX C

REGISTERED ABORIGINAL PARTY CONSULTATION DOCUMENTATION

From: [Ginger-Rose Harrington](#)
To: [Geospatial Search Requests](#)
Cc: [Aaron Olsen](#)
Subject: NNTT Search Request - Santa Sabina College (Our Ref#P0051207)
Date: Wednesday, 17 January 2024 12:18:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[Santa Sabina NNTT Search Request.pdf](#)

To Whom It May Concern,

Please see the attached native title search for 90-98 The Boulevard, Strathfield in NSW. Legally, this area is described as Lots 1, 2, 3, 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lot 1, 2, 3, 4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088. Overall, the area is located within Burwood Council area.

Many thanks in advance,
Ginger

GINGER-ROSE HARRINGTON
CONSULTANT

D +61 2 8424 5139
E gharrington@urbis.com.au

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COMMUNITIES**



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From: [Geospatial Search Requests](#)
To: [Ginger-Rose Harrington](#)
Cc: [Aaron Olsen](#)
Subject: RE: SR24/69 - NNTT Search Request - Santa Sabina College (Our Ref#P0051207) - SR24/69 [SEC=OFFICIAL]
Date: Thursday, 18 January 2024 11:30:01 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

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OFFICIAL

Your ref: P0051207 **Our ref:** SR24/69

Dear Ginger-Rose Harrington,

Thank you for your search request, please find your results below.

Search Results

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

- Schedule of Native Title Determination Applications
- Register of Native Title Claims
- Native Title Determinations
- Indigenous Land Use Agreements (Registered and notified)

Results for overlapping native title matters in NSW:

Feature ID	Tenure	Cadastral Data As At	Feature Area SqKm	Overlapping Native Title Feature				
				NNTT File Number	Name	Category	Overlap Area SqKm	% Selected Feature
1//DP2791	FREEHOLD	4/05/2023	0.0023	No overlap			-	0.00%
1//DP307088	FREEHOLD	4/05/2023	0.0019	No overlap			-	0.00%
1//DP456966	FREEHOLD	4/05/2023	0.0035	No overlap			-	0.00%
1//DP38889	FREEHOLD	4/05/2023	0.0018	No overlap			-	0.00%
2//DP2791	FREEHOLD	4/05/2023	0.0021	No overlap			-	0.00%
2//DP456966	FREEHOLD	4/05/2023	0.0042	No overlap			-	0.00%
3//DP2791	FREEHOLD	4/05/2023	0.0201	No overlap			-	0.00%
3//DP456966	FREEHOLD	4/05/2023	0.0040	No overlap			-	0.00%
4//DP456966	FREEHOLD	4/05/2023	0.0018	No overlap			-	0.00%
A//DP388128	FREEHOLD	4/05/2023	0.0212	No overlap			-	0.00%

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

Information on native title claims and freehold land can also be found on the Tribunal's website here: [Native title claims and freehold land](#).

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

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

Search results and the existence of native title

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

The Tribunal accepts no liability for reliance placed on enclosed information

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

If you have any further queries, please do not hesitate to contact us via GeospatialSearch@NNTT.gov.au

Regards,

[Geospatial Searches](#)
National Native Title Tribunal | Perth
Email: GeospatialSearch@nntt.gov.au | www.nntt.gov.au

From: Ginger-Rose Harrington <gharrington@urbis.com.au>
Sent: Wednesday, January 17, 2024 9:18 AM
To: Geospatial Search Requests <GeospatialSearch@NNTT.gov.au>
Cc: Aaron Olsen <aolsen@urbis.com.au>
Subject: SR24/69 - NNTT Search Request - Santa Sabina College (Our Ref#P0051207)

Caution: This is an external email. DO NOT click links or open attachments unless you recognise the sender and know the content is safe.

From: [Barry Gunther](#)
To: [Ginger-Rose Harrington](#)
Subject: Heritage NSW Aboriginal stakeholder list for 90-98 The Boulevard, Strathfield.
Date: Monday, 22 January 2024 4:12:40 PM
Attachments: [P0051207_SantaSabinaCollege_Stage1.2_AgencyNotice-D02.pdf](#)
[Heritage NSW Aboriginal stakeholder list for Burwood LGA.docx](#)

CAUTION: This email originated from outside Urbis group. Don't click on links or attachments unless you trust the sender.

Hi Ginger,

Please find attached the Heritage NSW Aboriginal stakeholder list for 90-98 The Boulevard, Strathfield.

regards

[Barry Gunther](#)

Aboriginal Senior Assessment Officer

Heritage NSW

[Department of Climate Change,](#)

[Energy, the Environment and Water](#)

www.environment.nsw.gov.au/topics/heritage

Locked bag 5020

Parramatta NSW 2124

Working days Monday to Friday, 9:00am - 5:00pm

I acknowledge the traditional custodians of the land and pay respects to Elders past and present.

I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment, Energy and Science.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

From: [Ginger-Rose Harrington](#)
To: [Aaron Olsen](#)
Cc: [Sam Richards](#)
Bcc: metrolalc@metrolalc.org.au; gs.service@lts.nsw.gov.au; council@burwood.nsw.gov.au; information@ntscorp.com.au; [OEH HD Heritage Mailbox](#); adminofficer@oralra.nsw.gov.au
Subject: Stage 1.2 Agency Notice - Santa Sabina College - Aboriginal Cultural Heritage Assessment (our ref #P0051207)
Date: Friday, 19 January 2024 3:14:00 PM
Attachments: [P0051207_SantaSabinaCollege_Stage1.2_AgencyNotice-D02.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Good afternoon all,

Urbis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) of 90-98 The Boulevard, Strathfield in Sydney, NSW, legally described as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088. Overall, the site is located within the Burwood Council area and the administrative catchment of the Metropolitan Local Aboriginal Land Council.

As part of the consultation process for the ACHA, we are seeking to compile a list of Aboriginal people and organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area. You have been contacted in accordance with the requirements established in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010). We are aware that some organisations do not provide response to this request.

If you are aware of any Aboriginal persons and/or organisations that may hold an interest in the project, we request that you please provide their details by return email at your earliest convenience and preferably by **7th February 2024**.

For further details, please refer to the formal letter attached.

Kind regards,

GINGER-ROSE HARRINGTON
CONSULTANT

D +61 2 8424 5139
E gharrington@urbis.com.au

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Learn more about our [Reconciliation Action Plan](#).



29 January 2024

By email: gharrington@urbis.com.au

Ginger-Rose Harrington
Consultant
Urbis Pty Ltd
Level 8, 123 Pitt Street
SYDNEY NSW 2000

Dear Ginger-Rose

Aboriginal Cultural Heritage Assessment - Proposed demolition, enabling works and construction of a sport and aquatic Centre at 90-98 The Boulevard (comprising various Lot and DP numbers) Strathfield NSW: request for list of potential Aboriginal stakeholders

We refer to your email and letter to this Office, dated 24 January 2024, requesting contact information for Aboriginal organisations, stakeholders and/or people who may have cultural knowledge relevant to the proposed demolition, enabling works and construction of a sport and aquatic Centre at 90-98 The Boulevard (various Lot and DPs) Strathfield NSW: request for list of potential Aboriginal stakeholders, as part of an Aboriginal Cultural Heritage Assessment (ACHA).

Under Section 170 of the *Aboriginal Land Rights Act 1983* (NSW), the Office of the Registrar is required to maintain the Register of Aboriginal Owners (RAO) for New South Wales. A search of the RAO has shown that there are currently no Registered Aboriginal Owners in the project area.

The proposed development and study area falls within the boundaries of Metropolitan Local Aboriginal Land Council. We suggest you contact Metropolitan Local Aboriginal Land Council (contact details provided below), as they may wish to participate or contribute.

Yours sincerely

Karen Carter

Karen Carter
Project Officer
Office of the Registrar, Aboriginal Land Rights Act 1983

Metropolitan Local Aboriginal Land Council
PO Box 1103
STRAWBERRY HILLS NSW 2012
02 8394 9666

🔍 Search e.g. product, service

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REGISTRATION OF INTEREST - SANTA SABINA COLLEGE, 90-98 THE BOULEVARD, STRATHFIELD ABORIGINAL CULTURAL HERITAGE ASSESSMENT



📅 23/1/2024

Urbis has been commissioned by Pier Property Corporation on behalf of Santa Sabina College (the Proponent) to conduct an Aboriginal Cultural Heritage Assessment (ACHA) of 90-98 The Boulevard, Strathfield in Sydney, NSW, legally described as Lots 1-4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088. The ACHA is being prepared to support a future State Significant Development Application (SSDA), which seeks approval for demolition and enabling works and the construction of a sport and aquatic centre. The proponent can be contacted directly via:

Polly Priday,

Senior Project Manager

Pier Property Corporation

polly@pierproperty.com.au

In accordance with Section 4.1.3 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010) and Clause 80C of the NSW National Parks and Wildlife Regulation 2009, the Proponent is seeking the registration of Aboriginal persons or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) that may be present in the subject area.

The purpose of community consultation with Aboriginal people is to assist the Proponent in the preparation of the ACHA and the assessment of the cultural heritage significance of the subject area.

The purpose of community consultation with Aboriginal people is to assist the Proponent in the preparation of the ACHA and the assessment of the cultural heritage significance of the subject area.

Please register your interest in writing to the contact details provided below by **5.00pm 7th February 2024**.

Ginger-Rose Harrington

Consultant

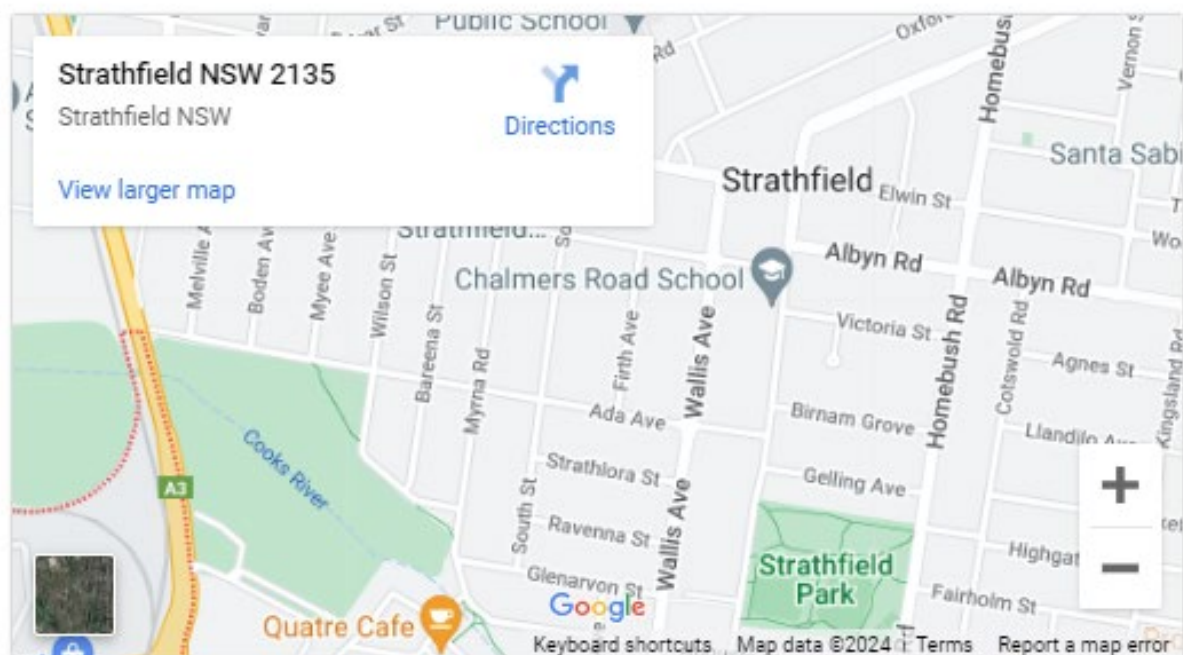
Urbis Pty Ltd

gharrington@urbis.com.au

Level 8, 123 Pitt Street, Sydney, 2000.

Please be advised that the Proponent is required to forward the names of Aboriginal persons and groups who register an interest to Heritage NSW and the Metropolitan Local Aboriginal Land Council, unless the person or group specifies that they do not want their details released.

📍 Strathfield 2135



Ali Byrne

From: Ginger-Rose Harrington
Sent: Thursday, 30 May 2024 9:01 AM
To: Ali Byrne
Subject: FW: Santa Sabina College - Stage 1.3 Invitation - Aboriginal Cultural Heritage Assessment (Our Ref.#P0051207)
Attachments: P0051207_SantaSabinaCollege_Stage1.3_Invitation-D02.pdf

GINGER-ROSE HARRINGTON
CONSULTANT

D +61 2 8424 5139
E gharrington@urbis.com.au

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From: Cultural Heritage 2 <Culturalheritage2@metrolalc.org.au>
Sent: Wednesday, February 7, 2024 4:00 PM
To: Ginger-Rose Harrington <gharrington@urbis.com.au>; Aaron Olsen <aolsen@urbis.com.au>; am.richards@urbis.com.au
Cc: Operations Manager <operations@metrolalc.org.au>; Nathan Moran <nmoran@metrolalc.org.au>
Subject: FW: Santa Sabina College - Stage 1.3 Invitation - Aboriginal Cultural Heritage Assessment (Our Ref.#P0051207)

Some people who received this message don't often get email from culturalheritage2@metrolalc.org.au. [Learn why this is important](#)

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Hi Ginger-Rose,

Metropolitan Local Aboriginal Land Council (MLALC) wish to register our interest as key stakeholders for **Santa Sabina College - Stage 1.3 Invitation - Aboriginal Cultural Heritage Assessment (Our Ref.#P0051207)**.

Should you require further information, please feel free to reach out.

Kind Regards,
Jacqueline.

From: Operations Manager <operations@metrolalc.org.au>
Sent: Wednesday, January 24, 2024 12:47 PM
To: Cultural Heritage 2 <Culturalheritage2@metrolalc.org.au>; Cultural Officer <culturalofficer@metrolalc.org.au>
Cc: Cultural Heritage <culturalheritage@metrolalc.org.au>
Subject: FW: Santa Sabina College - Stage 1.3 Invitation - Aboriginal Cultural Heritage Assessment (Our Ref.#P0051207)

Kind Regards,

Kelly Smith
Operations Manager
0413 913 376



Metropolitan Local Aboriginal Land Council (MLALC)
Level 2, 150-152 Elizabeth St Sydney NSW 2000
PO Box 1103, Strawberry Hills NSW 2012
B: (02) 8394 9666 M: 0413 913 376 W: www.metrolalc.org.au

Always Was * Always Will Be * Aboriginal Land

MLALC acknowledge the Eora Nation as the traditional owners of the area MLALC operates.

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From: Ginger-Rose Harrington <gharrington@urbis.com.au>
Sent: Wednesday, January 24, 2024 12:21 PM
To: Aaron Olsen <aolsen@urbis.com.au>
Cc: Sam Richards <sam.richards@urbis.com.au>
Subject: Santa Sabina College - Stage 1.3 Invitation - Aboriginal Cultural Heritage Assessment (Our Ref.#P0051207)

Good afternoon,

Pier Property Corporation on behalf of Santa Sabina College (the Proponent) has commissioned Urbis to conduct an Aboriginal Cultural Heritage Assessment (ACHA) of 90-98 The Boulevard, Strathfield in Sydney, NSW, legally

described as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088 (the 'subject area').

In accordance with Section 4.1.3 of the *Aboriginal cultural heritage consultation requirements for proponents 2010*, Urbis proposes to invite Aboriginal people and/or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area.

Please find attached the official invitation letter with further information.

If you would like to register your interest in this project, please respond in writing by clearly stating your interest and nominating a contact person by **5pm, 7th February 2024**.

Kind regards,

GINGER-ROSE HARRINGTON
CONSULTANT

D +61 2 8424 5139
E gharrington@urbis.com.au

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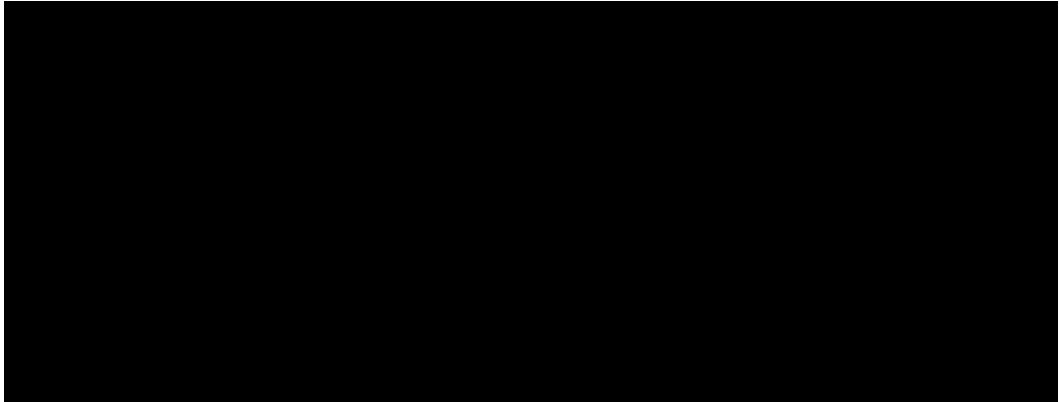
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From: [Ginger-Rose Harrington](#)
To: [Aaron Olsen](#)
Cc: [Sam Richards](#)
Bcc:



Subject:

Date: Wednesday, 24 January 2024 12:20:00 PM

Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[P0051207_SantaSabinaCollege_Stage1.3_Invitation-D02.pdf](#)

Good afternoon,

Pier Property Corporation on behalf of Santa Sabina College (the Proponent) has commissioned Urbis to conduct an Aboriginal Cultural Heritage Assessment (ACHA) of 90-98 The Boulevard, Strathfield in Sydney, NSW, legally described as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088 (the 'subject area').

In accordance with Section 4.1.3 of the *Aboriginal cultural heritage consultation requirements for proponents 2010*, Urbis proposes to invite Aboriginal people and/or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area.

Please find attached the official invitation letter with further information.

If you would like to register your interest in this project, please respond in writing by clearly stating your interest and nominating a contact person by **5pm, 7th February 2024**.

Kind regards,

GINGER-ROSE HARRINGTON
CONSULTANT

D +61 2 8424 5139
E gharrington@urbis.com.au

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**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Ltd
ABN 50 105 256 228

24 January 2024

To whom it may concern,

SANTA SABINA COLLEGE – 90-98 THE BOULEVARDE, STRATHFIELD – ABORIGINAL CULTURAL HERITAGE ASSESSMENT – REGISTRATION OF INTEREST

Please be advised that your contact details have been provided Heritage NSW in accordance with Section 4.1.2 of the *Aboriginal cultural heritage consultation requirements for proponents* (DECCW, 2010) (hereafter referred as the Consultation Requirements) as a potential Aboriginal stakeholder who may have interest in registering to the abovementioned project.

Pier Property Corporation on behalf of Santa Sabina College (the Proponent) has commissioned Urbis to conduct an Aboriginal Cultural Heritage Assessment (ACHA) of 90-98 The Boulevard, Strathfield in Sydney, NSW, legally described as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088 (the 'subject area').

The ACHA is being prepared to support a future State Significant Development Application (SSDA), which seeks approval for demolition and enabling works and the construction of a sport and aquatic centre.

The ACHA is to be carried out in accordance with relevant guidelines under the *National Parks and Wildlife Act 1974* (NPW Act), including the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011). The assessment would detail any potential Aboriginal cultural heritage resources within the subject area and provide recommendations regarding management of those resources. This ACHA will also be used to support an Aboriginal Heritage Impact Permit (AHIP) if deemed necessary.

The Proponent can be contacted via:

Polly Priday,
Senior Project Manager
Pier Property Corporation
polly@pierproperty.com.au

In accordance with the Consultation Requirements and Clause 80C of the *NSW National Parks and Wildlife Regulation 2019*, the Proponent will conduct a community consultation process with registered Aboriginal parties to assist with the preparation of the ACHA.

In accordance with Section 4.1.2 of the Consultation Requirements Urbis proposes to invite Aboriginal people and/or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area.



Should you wish to register your interest in this project, please respond in writing by clearly stating your interest and nominating a contact person by **5.00pm 7th February 2024**. Please send responses to the following:

Ginger-Rose Harrington
Consultant
Urbis Pty Ltd
gharrington@urbis.com.au
Level 8, 123 Pitt Street, Sydney, 2000.

Please be advised that, as per the Consultation Requirements, the Proponent is required to forward the names of Aboriginal persons and groups who register an interest (Registered Aboriginal Parties) to the Metropolitan Local Aboriginal Land Council and Heritage NSW unless the person or group specifies that they do not want their details released.

Please also be advised that in accordance with Section 3.4 of the Consultation Requirements, inclusion in the consultation process does not automatically result in paid site assessment. The decision on who is engaged for delivering particular services is decided by the proponent and will be based on a range of considerations including skills, relevant experience, and providing necessary certificates of currency.

Please do not hesitate to contact us should you have any queries in relation to the provided information.

Kind regards,

A handwritten signature in black ink, appearing to read "Aaron Olsen", with a long, sweeping horizontal line extending to the right.

Aaron Olsen
Senior Consultant
+61 2 8233 9957
aolsen@urbis.com.au

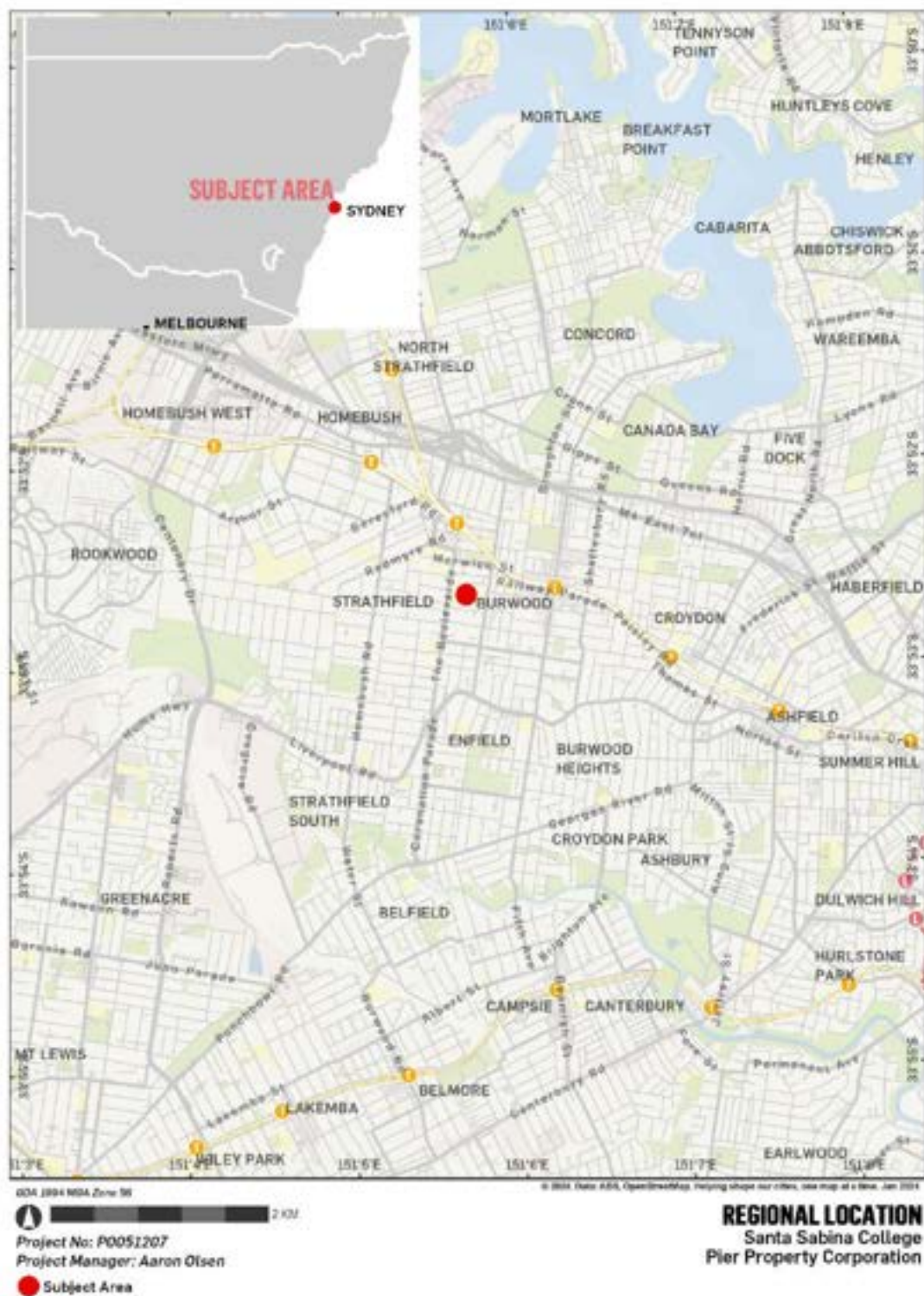
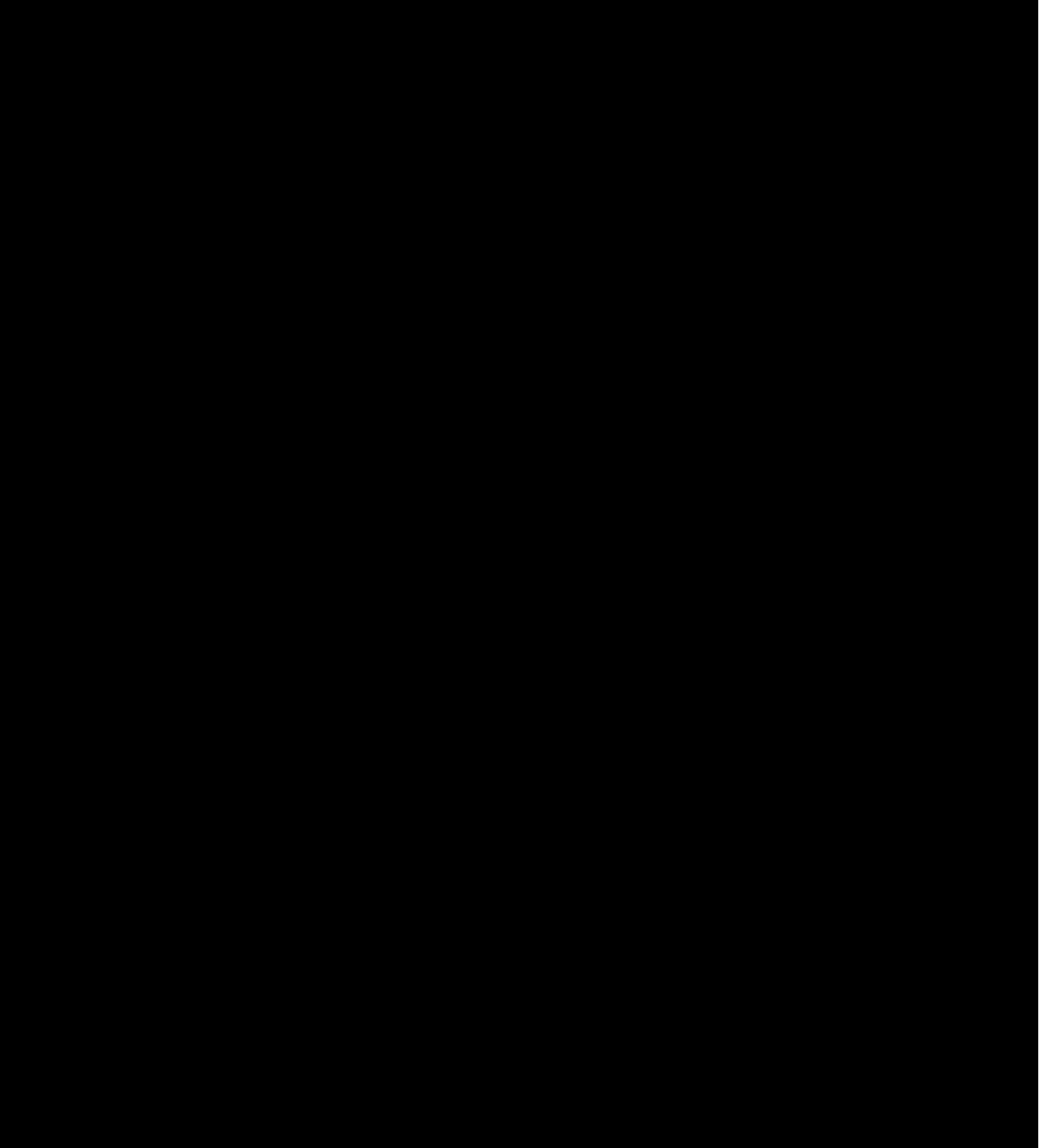


Figure 1 – Regional Location of the Subject Area





As I mentioned on the phone, we are currently at consultation Stage 2/3, which will close on the 13th March. After this date, we will review the submitted responses and issue invitations to undertake a site inspection.

Please find attached our formal invitation to register for consultation (Stage 1.3 letter) and methodological overview (Stage 2/3 letter) for your reference.

If you wish to provide any comments in relation to the attached Stage 2/3 document, please do so by **5:00pm on 13 March 2024** to:

Ginger-Rose Harrington
Consultant
Urbis Ltd
Level 8, 123 Pitt Street, Sydney, 2000
E: gharrington@urbis.com.au

On Wed, Jan 24, 2024 at 12:21 PM Ginger-Rose Harrington <gharrington@urbis.com.au> wrote:

Good afternoon,

Pier Property Corporation on behalf of Santa Sabina College (the Proponent) has commissioned Urbis to conduct an Aboriginal Cultural Heritage Assessment (ACHA) of 90-98 The Boulevard, Strathfield in Sydney, NSW, legally described as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088 (the 'subject area').

In accordance with Section 4.1.3 of the *Aboriginal cultural heritage consultation requirements for proponents 2010*, Urbis proposes to invite Aboriginal people and/or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area.

Please find attached the official invitation letter with further information.

If you would like to register your interest in this project, please respond in writing by clearly stating your interest and nominating a contact person by **5pm, 7th February 2024**.

Kind regards,

----- Forwarded message -----

From: **Ginger-Rose Harrington** <gharrington@urbis.com.au>

Date: Wed, Jan 24, 2024 at 12:21 PM

Subject: Santa Sabina College - Stage 1.3 Invitation - Aboriginal Cultural Heritage Assessment (Our Ref.#P0051207)

To: Aaron Olsen <aolsen@urbis.com.au>

Cc: Sam Richards <sam.richards@urbis.com.au>

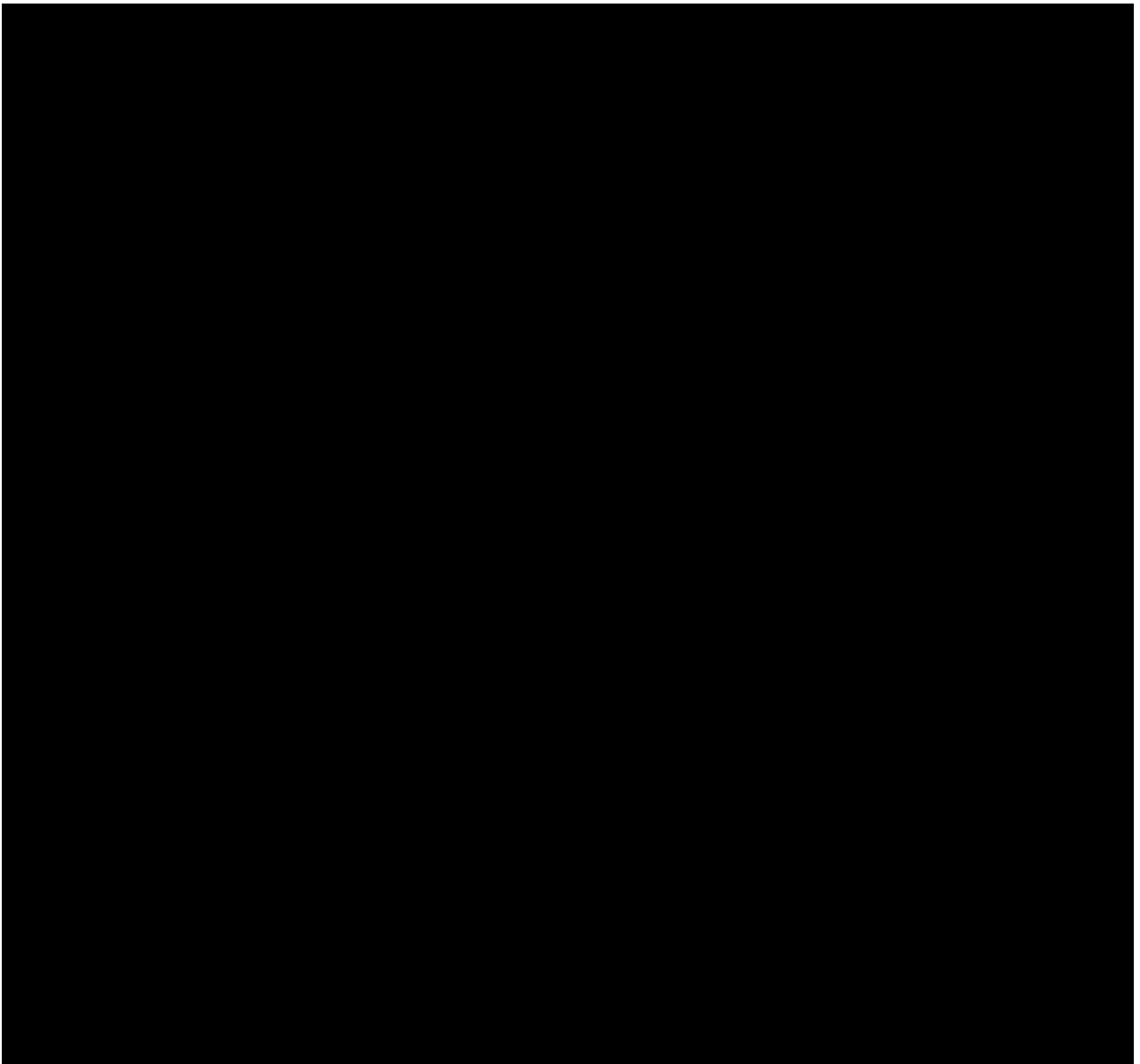
Good afternoon,

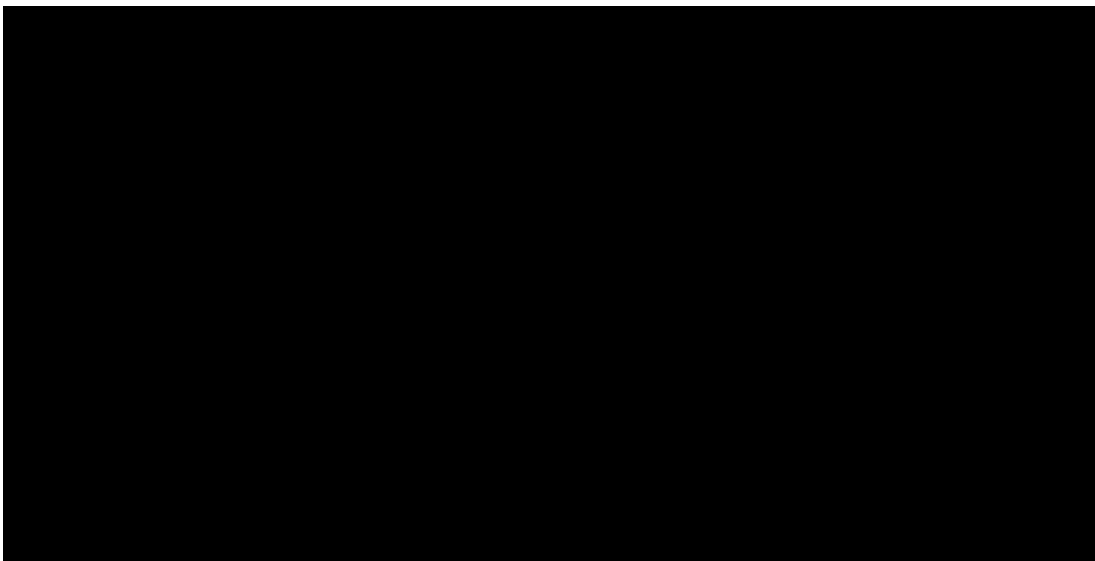
Pier Property Corporation on behalf of Santa Sabina College (the Proponent) has commissioned Urbis to conduct an Aboriginal Cultural Heritage Assessment (ACHA) of 90-98 The Boulevard, Strathfield in Sydney, NSW, legally described as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088 (the 'subject area').

In accordance with Section 4.1.3 of the *Aboriginal cultural heritage consultation requirements for proponents 2010*, Urbis proposes to invite Aboriginal people and/or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area.

Please find attached the official invitation letter with further information.

If you would like to register your interest in this project, please respond in writing by clearly stating your interest and nominating a contact person by **5pm, 7th February 2024**.





From: Ginger-Rose Harrington <gharrington@urbis.com.au>
Sent: Wednesday, January 24, 2024 12:20:57 PM
To: Aaron Olsen <aolsen@urbis.com.au>
Cc: Sam Richards <sam.richards@urbis.com.au>
Subject: Santa Sabina College - Stage 1.3 Invitation - Aboriginal Cultural Heritage Assessment (Our Ref.#P0051207)

Good afternoon,

Pier Property Corporation on behalf of Santa Sabina College (the Proponent) has commissioned Urbis to conduct an Aboriginal Cultural Heritage Assessment (ACHA) of 90-98 The Boulevard, Strathfield in Sydney, NSW, legally described as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088 (the 'subject area').

In accordance with Section 4.1.3 of the *Aboriginal cultural heritage consultation requirements for proponents 2010*, Urbis proposes to invite Aboriginal people and/or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area.

Please find attached the official invitation letter with further information.

If you would like to register your interest in this project, please respond in writing by clearly stating your interest and nominating a contact person by **5pm, 7th February 2024**.

Kind regards,

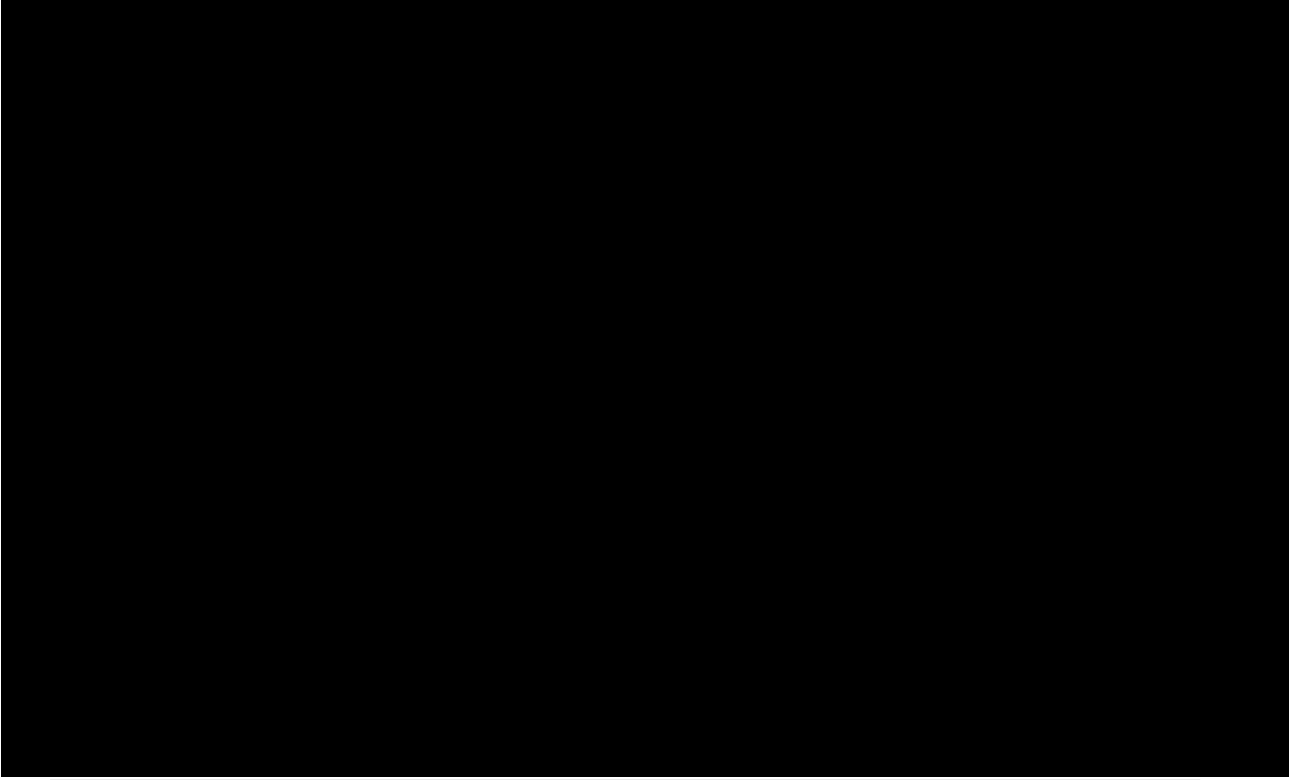
GINGER-ROSE HARRINGTON
CONSULTANT

D +61 2 8424 5139
E gharrington@urbis.com.au

**SHAPING
CITIES AND
COMMUNITIES**



[The following text is a dense, continuous block of text, likely a scan of a document page. It is mostly illegible due to extreme blurring and low contrast. The text appears to be a single paragraph or a series of lines of prose, but the specific words and sentences cannot be transcribed accurately.]



From: Ginger-Rose Harrington <gharrington@urbis.com.au>

Sent: Wednesday, 24 January 2024 12:20 PM

To: Aaron Olsen <aolsen@urbis.com.au>

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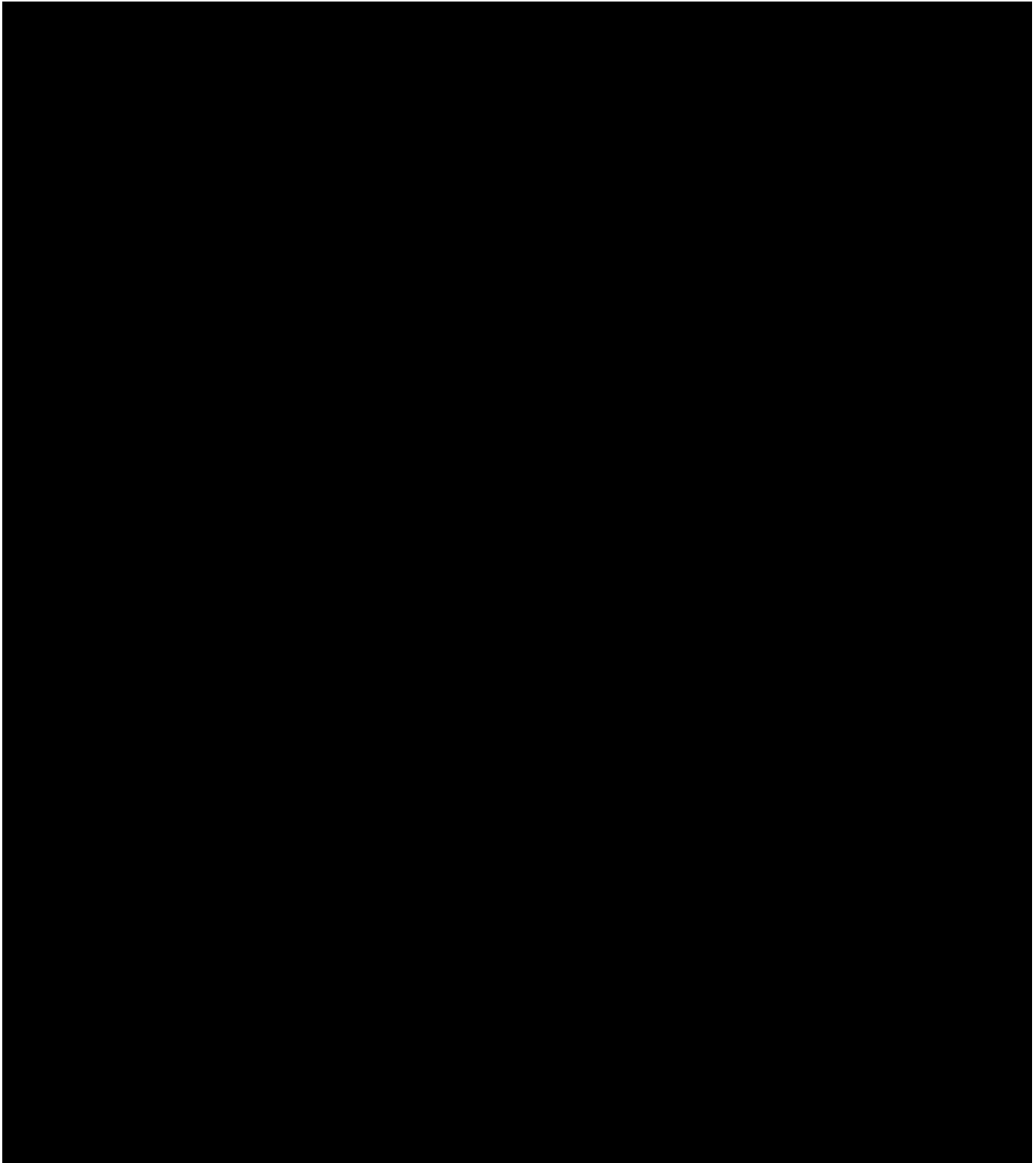
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CONSULTANT

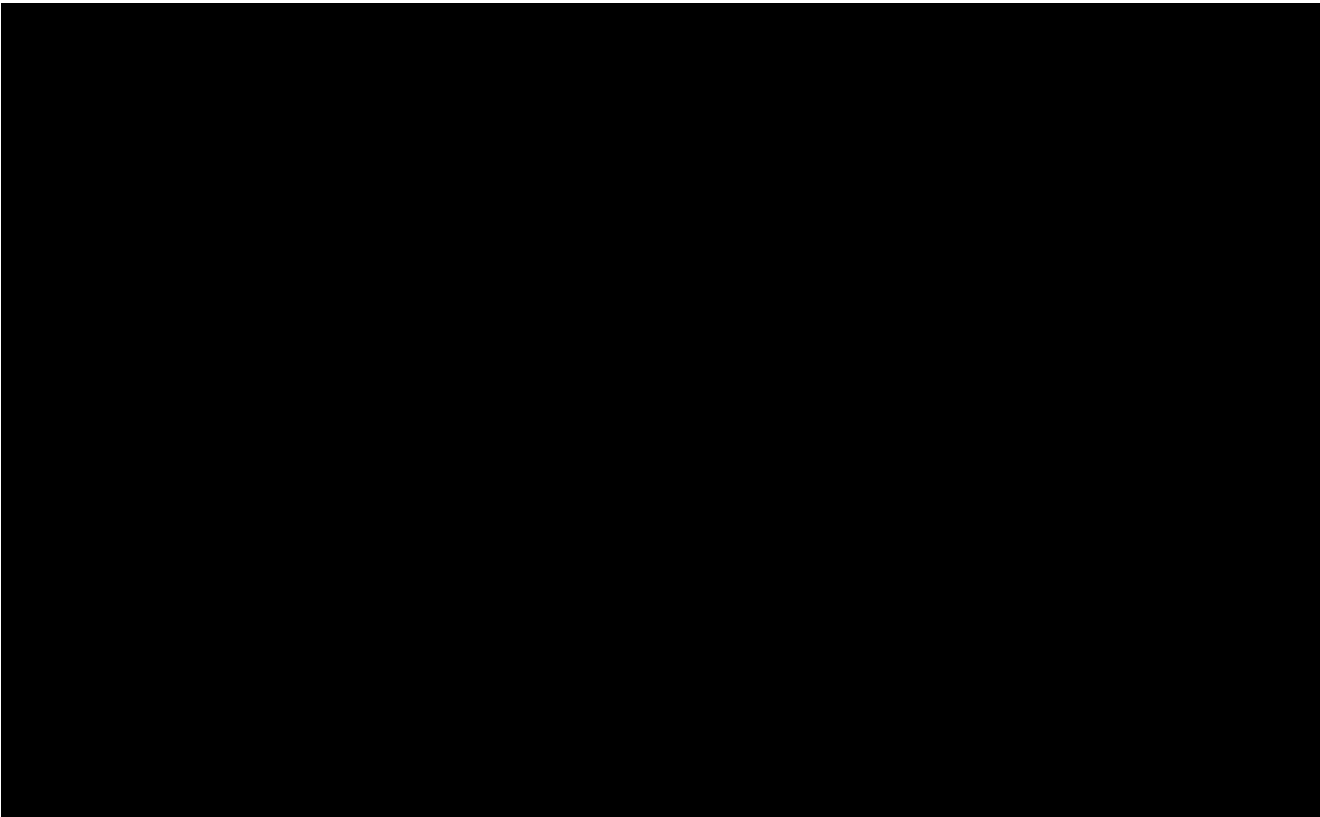
D +61 2 8424 5139

E gharrington@urbis.com.au



I acknowledge the traditional custodians of country and recognise their continuing connection to land, waters, and community on which I am grateful to live, work and visit. I pay my respects to them, their cultures, and traditions. I honor our Elders both past and present and encourage our future generations to strive.

It always was and always will be, Aboriginal land. Our Ancestors live on, within us.



On 24 Jan 2024, at 12:21 pm, Ginger-Rose Harrington
<gharrington@urbis.com.au> wrote:

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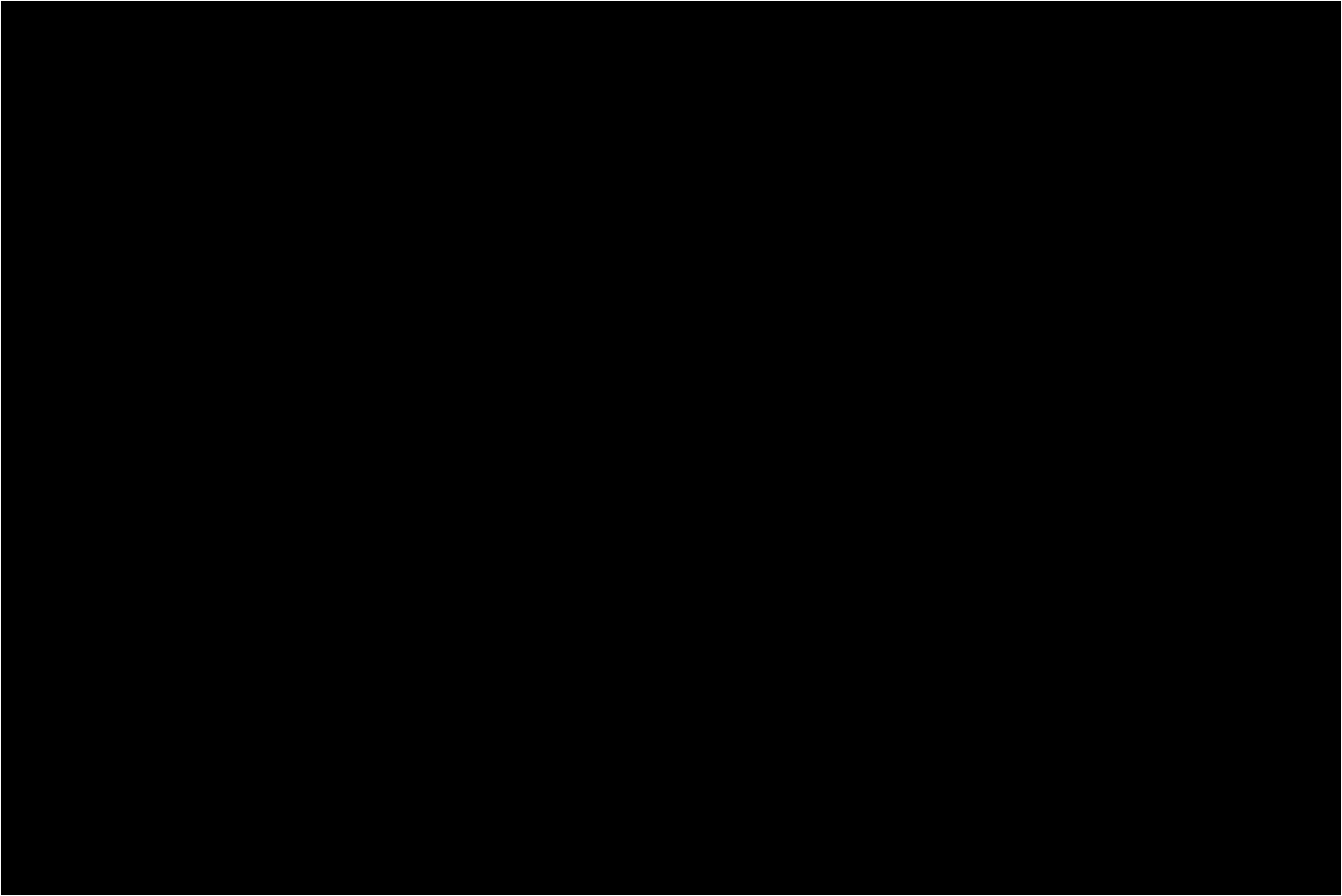
D +61 2 8424 5139
E gharrington@urbis.com.au
<image001.png>

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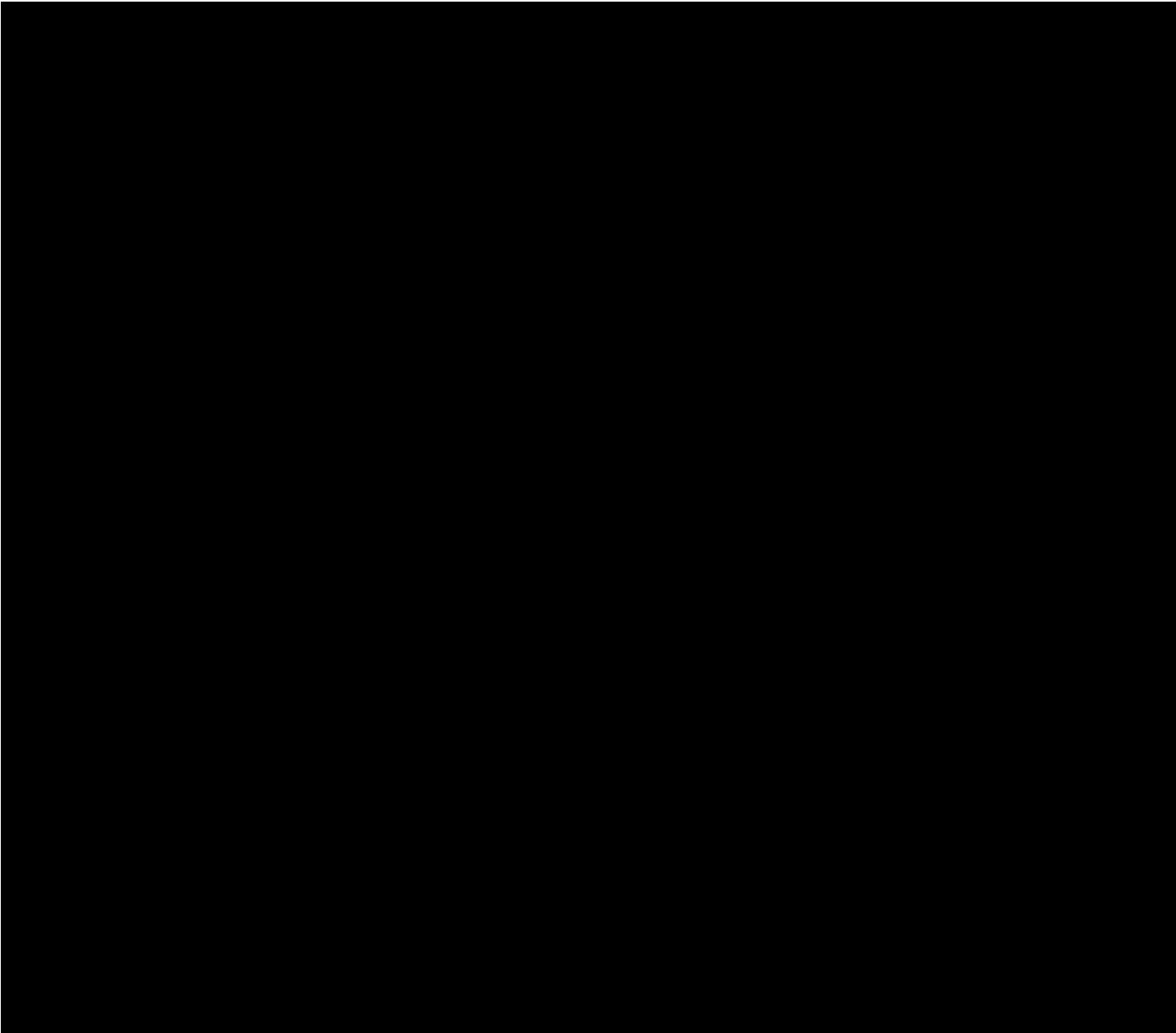
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<image001.png>

[<image002.png>](#)
[<image003.png>](#)



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ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000

URBIS.COM.AU
Urbis Ltd
ABN 50 105 256 228

28 February 2023

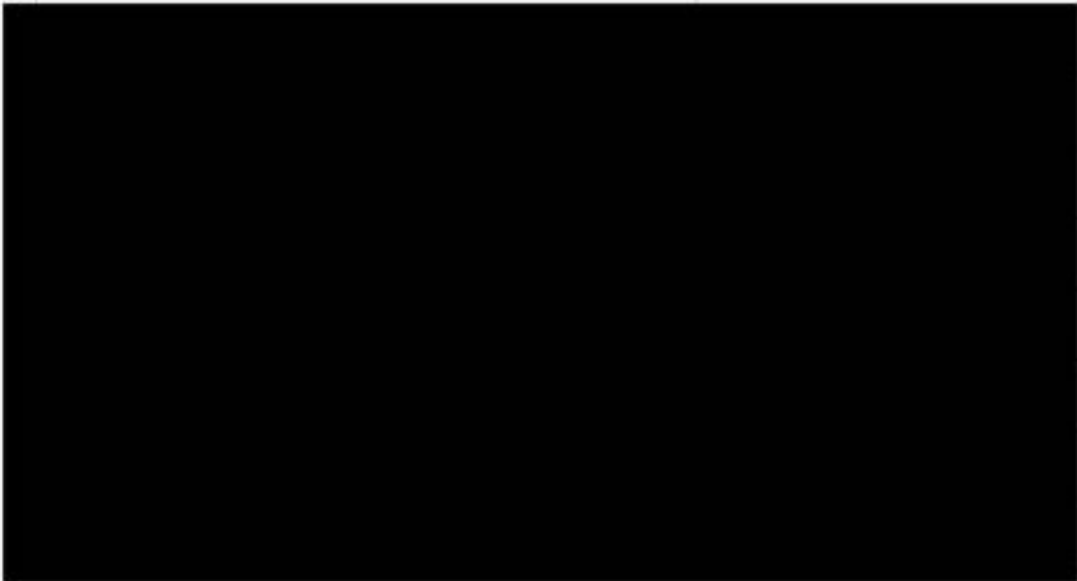
Aboriginal Cultural Heritage Regulation Branch
Heritage NSW
Department of Planning & Environment
By email: heritagemailbox@environment.nsw.gov.au

To whom it may concern,

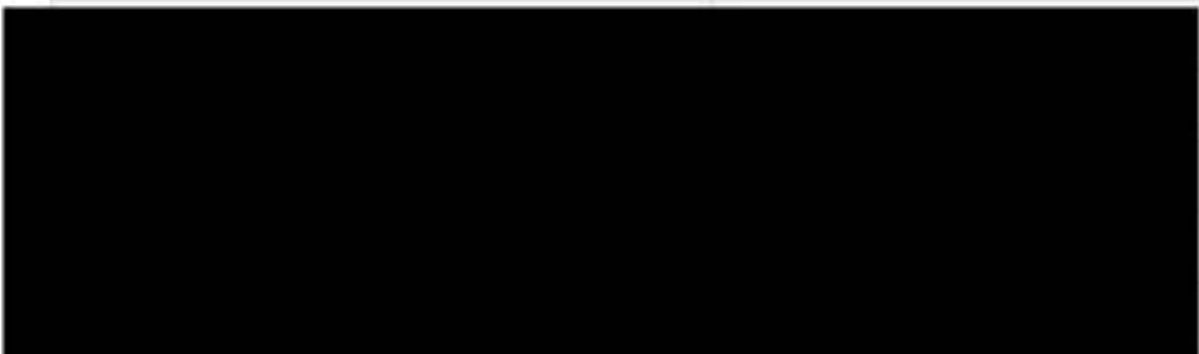
SANTA SABINA COLLEGE – 90-98 THE BOULEVARDE, STRATHFIELD – ABORIGINAL CULTURAL HERITAGE ASSESSMENT – STAGE 1.6 LIST OF REGISTERED ABORIGINAL PARTIES AND NOTIFICATION LETTER

In accordance with Section 4.1.6 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW, 2010) please find below the compiled list of Registered Aboriginal Parties (RAPs) and notification letter under Section 4.1.3 for the abovementioned project (attached to associated email).

Table 1 – List of Registered Aboriginal Parties

Name	Contact
	



Name	Contact
	

Please do not hesitate to contact us should you have any queries in relation to the provided information.

Kind regards,



Aaron Olsen
Senior Consultant
+61 2 8233 9957
aolsen@urbis.com.au



**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

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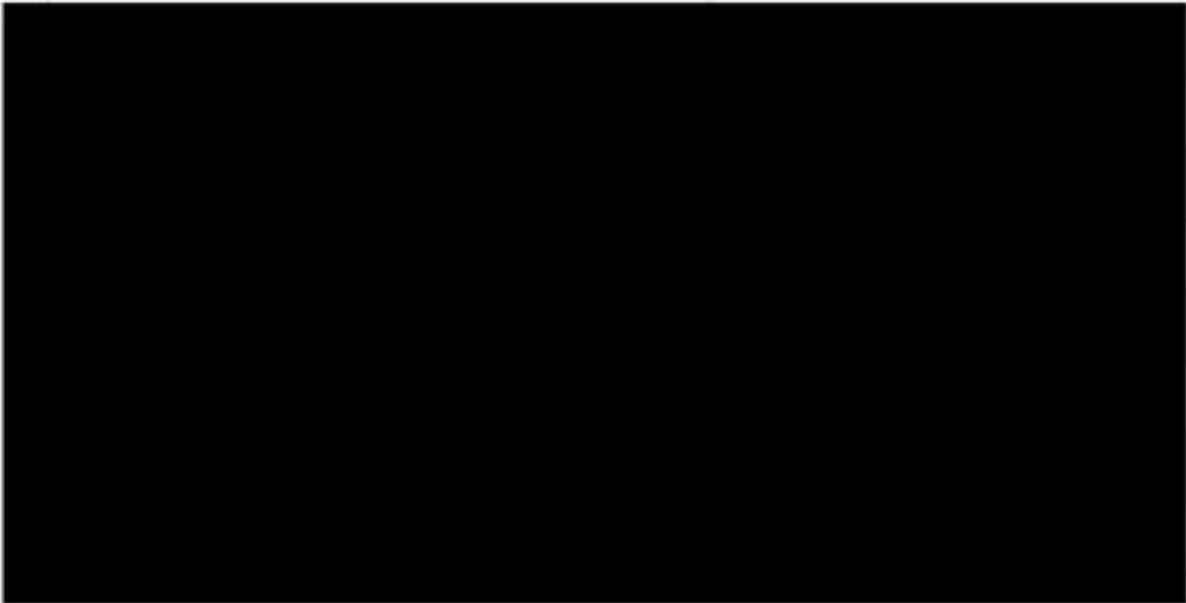
Metropolitan Local Aboriginal Land Council
PO Box 1103
Strawberry Hills, NSW 2016
By email: officeadmin@metrolalc.org.au

To whom it may concern,

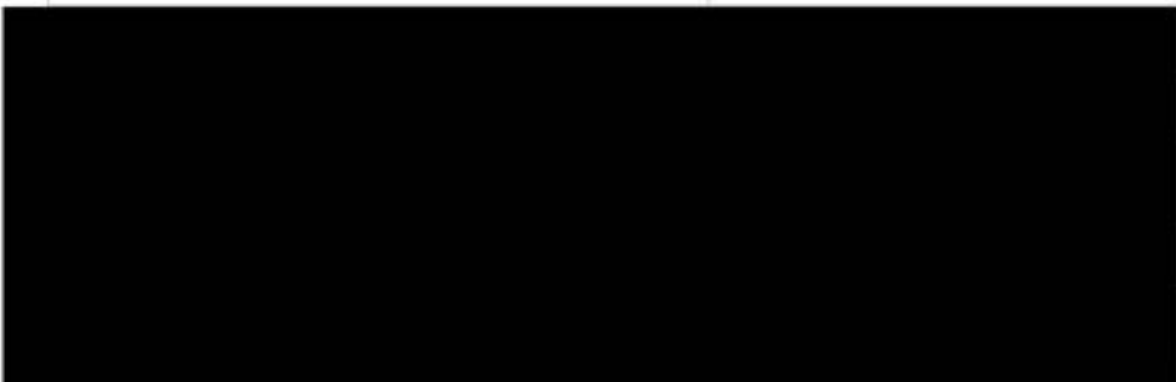
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ABORIGINAL CULTURAL HERITAGE ASSESSMENT – LIST OF REGISTERED
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aolsen@urbis.com.au

From: [Aaron Olsen](#)
Cc: [Ginger-Rose Harrington](#)
Bcc:

Subject: Santa Sabina College - Aboriginal Cultural Heritage Assessment - Project Information and Methodology
Date: Wednesday, 14 February 2024 11:03:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[P0051207_SantaSabina_Stage2-3.pdf](#)

Good afternoon

Thank you for registering your interest in the Aboriginal Cultural Heritage Assessment ('ACHA') of the Santa Sabina College Senior Campus, 90-98 The Boulevard, Strathfield, NSW.

In accordance with Sections 4.2 and 4.3 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010), please find attached a letter which provides information on the project and the methodology proposed to be employed for the ACHA.

You will note that we have included a request for specific information in the form of a questionnaire. We would appreciate your response to that questionnaire as soon as possible.

If you wish to provide any comments in relation to the attached document, please do so by **13 March 2024** to:

Ginger-Rose Harrington
Consultant
Urbis Ltd
Level 8, 123 Pitt Street, Sydney, 2000
E: gharrington@urbis.com.au

Please let us know if you have any questions.

Kind regards

Aaron

AARON OLSEN
SENIOR CONSULTANT

D +61 2 8233 9957
E aolsen@urbis.com.au

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CITIES AND
COMMUNITIES**



ANGEL PLACE, LEVEL 8, 123 PITT STREET
SYDNEY, NSW 2000, AUSTRALIA
GADIGAL COUNTRY
T +61 2 8233 9900

14 February 2024

To whom it may concern,

SANTA SABINA COLLEGE – ABORIGINAL CULTURAL HERITAGE ASSESSMENT – PRESENTING & GATHERING INFORMATION

Thank you for your interest in the Aboriginal Cultural Heritage Assessment (ACHA) of Santa Sabina College, 90-98 The Boulevard, Strathfield in Sydney, NSW, legally described as Lots 1- 4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088 (the 'subject area') (Figure 1 and Figure 2).

Urbis has been commissioned by Pier Property Corporation on behalf of Santa Sabina College ('the Proponent') to undertake the ACHA to support a State Significant Development Application that seeks approval for demolition and enabling works and the construction of a sport and aquatic centre within the subject area.

The Proponent can be contacted via:

Polly Priday
Senior Project Manager
Pier Property Corporation
E: polly@pierproperty.com.au

In accordance with Regulations 60(5)-(6) of the *National Parks and Wildlife Regulation 2019* ('NPW Reg') and Section 4.2 and 4.3 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (Department of Environment, Climate Change and Water NSW) ('the Consultation Requirements') this present communication aims to provide all Registered Aboriginal Parties (RAPs) with the proposed project information and a process to facilitate the following:

- Contribute to culturally appropriate information gathering and the research methodology.
- Provide information that will enable the cultural significance of Aboriginal objects and/or places on the proposed project area to be determined.
- Have input into the development of any cultural heritage management options.

SUBJECT AREA

The subject area is located at 90-98 The Boulevard, Strathfield, NSW and is legally referred to as Lots 1-4 in DP 456966, Lots 1-3 in DP 2791, Lot A in DP 388128, Lots 1-4 in DP 456966, Lot 1 in DP938889 and Lot 1 in DP307088. It is within the Burwood Local Government Area ('Burwood LGA'), and within the administrative bounds of the Metropolitan Local Aboriginal Land Council ('Metropolitan LALC').

To the north, the subject area is bounded by Russell Lane and medium density residential apartments. To the east of the subject area is bounded by Westworth Road. To the south, the subject area is bounded by Jersey Road, Goondie Aged Care and a number of residential dwellings. To the west the subject area is bounded by the Boulevard.

The subject area presently accommodates the existing Santa Sabina College Senior School and includes a number of existing buildings and facilities to enable the functioning of the school.

PROPOSED WORKS

The proposed development of the subject area comprises demolition and enabling works as well as the construction of the sport and aquatic centre, including the following works:

- Demolition of existing outdoor courts and car park to the north of the existing pool
- Construction of a new sports centre (of 2,852 sqm GFA) building including:
 - Main entrance and foyer area to the southwest
 - 3 x indoor multipurpose sports courts / hall
 - Covered promenade to the south connecting the 1967 Centenary building
 - Stage
 - Lift and stairs from the car park level
 - 2 x sports offices
 - Staff bathrooms
 - Student amenities - bathrooms / changerooms
 - Gym
 - Storage and building services
 - Undercroft car parking
 - Minor landscaping works

METHODOLOGY

The proposed impact assessment process for the ACHA, including the input points into the investigation and assessment activities for RAPs, is outlined below, in accordance with Reg. 60(6) of the NPW Reg and Section 4.2.2(b) of the Consultation Requirements.

The ACHA will be conducted in accordance with Part 6 of the *National Parks and Wildlife Act 1974* ('NPW Act') and Part 5 of the NPW Reg. It will further adhere to the following guidelines:

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

The ACHA will follow the general methodology described in Table 1 below.

Table 1 – Aboriginal cultural heritage assessment methodology

Process Method	Description
Desktop assessment	Collection and evaluation of background information, including archaeological and historical resources and environmental conditions, to develop a predictive model for archaeological potential.
Consultation with RAPs	Providing information on the project to RAPs and gathering information about the proposed methodology and the Aboriginal cultural heritage values and significance of the subject area.
Preparation of draft ACHA report	Synthesis of all information collected during the ACHA process to prepare a draft assessment report and provision of the draft report to the Proponent and the RAPs for comments. The report will include an assessment of significance of any Aboriginal objects or Aboriginal cultural heritage values that may exist within the subject area, an impact assessment and provide management and mitigation measures.
Finalisation of ACHA report	Incorporation of all comments from the Proponent and RAPs into ACHA report and finalisation.

Urbis welcomes input and information from the RAPs at any stage throughout the entire process of the ACHA. Consistent with the Consultation Requirements, the formal input points for the consultation are the following:

- During Stage 2 and 3 – Following review of the current communication which presents information about the proposed project and ACHA methodology.
- During Stage 2 and 3 – During or following the site visit and meeting.
- During Stage 4 – Following review of the draft ACHA.

CRITICAL TIMELINES

The critical timelines and milestones for the completion of the ACHA and delivery of reports are presented in Table 2 below, in accordance with Section 4.22 (c) of the Consultation Requirements. Please note the presented timeframes are estimates only and are intended as a guide to allow forward planning of personnel and resources.

Table 2 – Critical timelines

Project Stage	Anticipated Timeframe
Stage 2 and 3: Provision of comments on the provided information and proposed methodology (this document)	Within 28 days of the present document date (i.e. by 13 March 2024)
Site Inspection	Within 1 week of the completion of Stages 2 and 3
Stage 4: Provision of the draft ACHA report (including the proposed management and mitigation measures) to the RAPs	Within 2 weeks of completion of the site inspection
Stage 4: Provision of comments on the draft ACHA report	Within 28 days of delivery of the draft ACHA report to RAPs
Stage 4: Finalisation of the ACHA report including the consideration of all comments and feedback	Within one week of the closing of the comment period for the draft ACHA report

ROLES, FUNCTIONS AND RESPONSIBILITIES

The roles, functions and responsibilities of the proponent and RAPs are defined below, in accordance with Section 4.2.2(d) of the Consultation Requirements.

The roles, functions and responsibilities of the Proponent, Urbis (acting on behalf of the Proponent), RAPs and any other parties involved in the consultation process are those defined in Section 5 of the Consultation Requirements.

Please note that, in accordance with Section 3.4 of the Consultation Requirements, consultation does not include the employment of Aboriginal people to assist in field assessment and/or site monitoring. Furthermore, there is no obligation on the Proponent to employ Aboriginal people registered for consultation. Aboriginal people may provide services to the Proponent through a contractual arrangement separate to the consultation process. Consultation will continue irrespective of potential or actual employment opportunities for Aboriginal people.

GATHERING CULTURAL INFORMATION

Urbis is providing the opportunity for RAPs to identify, raise and discuss their cultural concerns, perspectives and assessment requirements (if any), in accordance with Section 4.2.2(e) of the Consultation Requirements.

Urbis is actively seeking information on the cultural heritage and cultural significance of the subject area. Such information includes the existence of any Aboriginal objects of cultural value to Aboriginal people in or near the subject area (whether declared under s.84 of the NPW Act or not), including places of social, spiritual and cultural value, historic places with cultural significance and potential places/areas of historic, social, spiritual and/or cultural significance.

Please also consider the following when providing information:

- Do you have information on any Aboriginal objects within or near the subject area?
- Do you or somebody you know have information of cultural values, stories in relation to the subject area and if that information can be shared?

If you or your organisation has sensitive or restricted public access information for determining or managing the heritage values of the subject area, it is proposed that the proponent will manage this information (if provided by the Aboriginal community) in accordance with a sensitive cultural information management protocol. It is anticipated that the protocol will include making note of and managing the material in accordance with the following key limitations as advised by Aboriginal people at the time of the information being provided:

- Any restrictions on access of the material.
- Any restrictions on communication of the material (confidentiality).
- Any restrictions on the location/storage of the material.
- Any cultural recommendations on handling the material.
- Any names and contact details of persons authorised within the relevant Aboriginal group to make decisions concerning the Aboriginal material and degree of authorisation.
- Any details of any consent given in accordance with customary law.
- Any access and use by the RAPs of the cultural information.

Please consider the above list when providing your recommendations regarding any culturally sensitive information.

QUESTIONNAIRE

To streamline information gathering during Stage 2 and 3, and to inform the proponent for any field inspection component, Urbis requests the following information from you:

- **Cultural connection:** Please describe the nature of your cultural connection to the country on which the subject area is situated. Please include any relevant cultural knowledge or knowledge of Aboriginal objects or places within the subject area. Have you ever lived in or near the subject area? If you are a Traditional Owner, please state this clearly.



- **Representing your community members:** Please state who you or your organisation represents. Do you or your organisation represent other members of the Aboriginal community? If so, please describe how information is provided to the other members, and how their information and knowledge may be provided back to the proponent and Urbis.
- **Previous experience:** Please list your relevant (for example, in the area of the proposed project) previous experience in providing cultural heritage advice and survey participation.
- **Schedule of Rates:** Please provide your Certificate of Currency including Product and Public Liability Insurance and Worker's Compensation. Please also include a schedule of rates (hourly/half day/day) for fieldwork participation, and include any expenses you may expect to incur, and these will be sought to be reimbursed. *Please note that it is for the discretion for the proponent to decide if they invite RAPs for site works and the consultation process does not guarantee paid employment.*

Please provide your response to the above questions along with any other information you wish to provide to:

Ginger-Rose Harrington
Consultant
Urbis Ltd
Level 8, 123 Pitt Street, Sydney, 2000
E: gharrington@urbis.com.au

Please provide the requested information by **13 March 2024**. Comments received after that date might be excluded from the draft ACHAR.

Kind regards,

A handwritten signature in black ink, appearing to be "A. Olsen", with a long horizontal flourish extending to the right.

Aaron Olsen
Senior Consultant
+61 2 8233 9957
aolsen@urbis.com.au

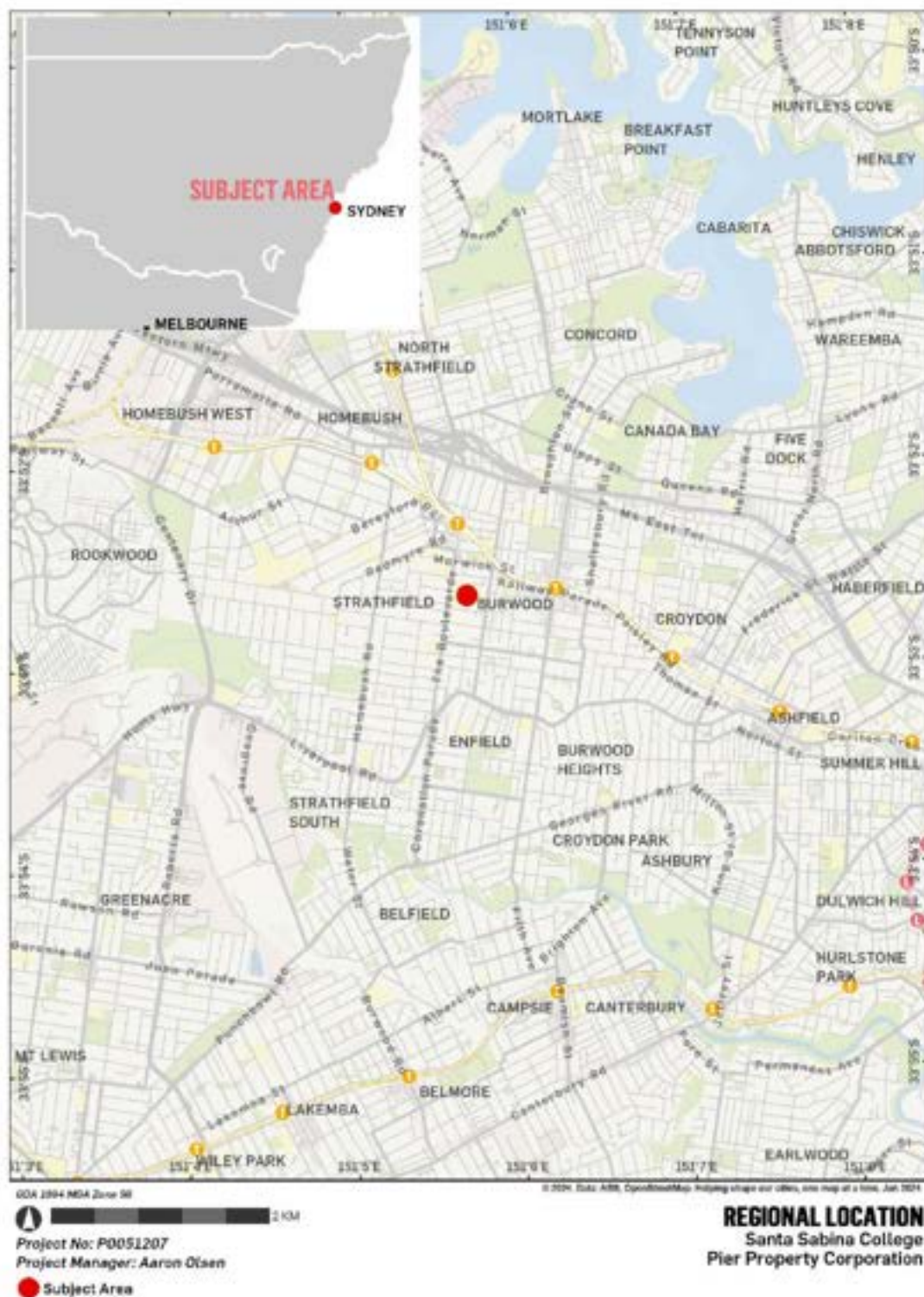


Figure 1 – Regional location of the subject area



Q04 1994 M04 Zone 161
 Project No: P0051207
 Project Manager: Aaron Olsen
 Subject Area — Contours

© 2024, Santa ABS, OpenStreetMap, Mapbox. Helping shape our cities, one map at a time. Jan 2024
LOCATION OF THE SUBJECT AREA
 Santa Sabina College
 Pier Property Corporation

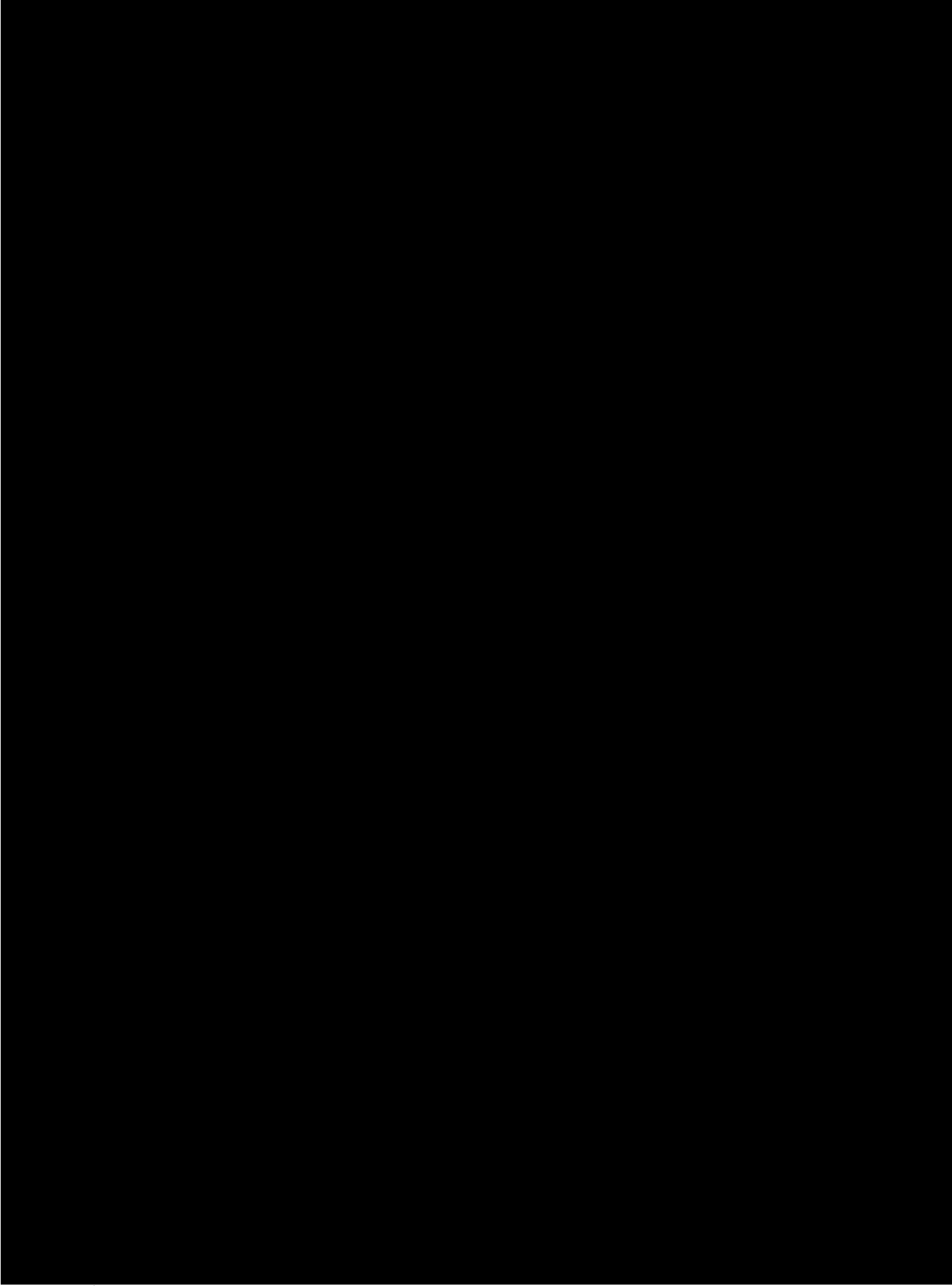
Figure 2 – Subject area

The first part of the paper discusses the importance of the research and the objectives of the study. It then moves on to a literature review, which provides a background on the topic and identifies the gaps in the existing research. The methodology section describes the research design, data collection, and analysis. The results section presents the findings of the study, and the conclusion summarizes the main points and offers suggestions for future research.

The research was conducted in a systematic and rigorous manner, following the principles of good research practice. The data were collected from a representative sample of the population, and the analysis was carried out using appropriate statistical techniques. The results of the study are presented in a clear and concise manner, and the conclusions are based on the evidence gathered.

The study has several strengths, including a well-defined research design, a large and representative sample, and the use of appropriate statistical methods. However, there are also some limitations, such as the cross-sectional nature of the data and the potential for self-report bias. Despite these limitations, the study provides valuable insights into the topic and contributes to the existing knowledge in the field.

In conclusion, the study highlights the importance of the research and the need for further investigation in this area. The findings suggest that there are significant differences between the groups, and these differences may be influenced by various factors. Further research is needed to explore these relationships in more detail and to identify the underlying mechanisms.



From: Aaron Olsen <aolsen@urbis.com.au>

Sent: Wednesday, 14 February 2024 11:03 AM

Cc: Ginger-Rose Harrington <gharrington@urbis.com.au>

Subject: Santa Sabina College - Aboriginal Cultural Heritage Assessment - Project Information

and Methodology

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GADIGAL COUNTRY
T +61 2 8233 9900



Urbis recognises the traditional owners of the land on which we work.
Learn more about our [Reconciliation Action Plan](#).

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Sent from [Mail](#) for Windows

From: Aaron Olsen <aolsen@urbis.com.au>

Sent: Wednesday, February 14, 2024 11:03:38 AM

Cc: Ginger-Rose Harrington <gharrington@urbis.com.au>

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You will note that we have included a request for specific information in the form of a questionnaire. We would appreciate your response to that questionnaire as soon as possible.

If you wish to provide any comments in relation to the attached document, please do so by **13 March 2024** to:

Ginger-Rose Harrington
Consultant
Urbis Ltd
Level 8, 123 Pitt Street, Sydney, 2000
E: gharrington@urbis.com.au

Please let us know if you have any questions.

Kind regards

Aaron

AARON OLSEN
SENIOR CONSULTANT

D +61 2 8233 9957
E aolsen@urbis.com.au

**SHAPING
CITIES AND
COMMUNITIES**



ANGEL PLACE, LEVEL 8, 123 PITT STREET
SYDNEY, NSW 2000, AUSTRALIA
GADIGAL COUNTRY
T +61 2 8233 9900



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[The following text is a dense, continuous block of illegible characters and symbols, likely representing a corrupted or redacted document. It contains no discernible words or structure.]



From: Aaron Olsen <aolsen@urbis.com.au>

Sent: Wednesday, 14 February 2024 11:03 AM

Cc: Ginger-Rose Harrington <gharrington@urbis.com.au>

Subject: Santa Sabina College - Aboriginal Cultural Heritage Assessment - Project Information and Methodology

Good afternoon

Thank you for registering your interest in the Aboriginal Cultural Heritage Assessment ('ACHA') of the Santa Sabina College Senior Campus, 90-98 The Boulevard, Strathfield, NSW.

In accordance with Sections 4.2 and 4.3 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010), please find attached a letter which provides information on the project and the methodology proposed to be employed for the ACHA.

You will note that we have included a request for specific information in the form of a questionnaire. We would appreciate your response to that questionnaire as soon as possible.

If you wish to provide any comments in relation to the attached document, please do so by **13 March 2024** to:

Ginger-Rose Harrington
Consultant
Urbis Ltd
Level 8, 123 Pitt Street, Sydney, 2000
E: gharrington@urbis.com.au

Please let us know if you have any questions.

Kind regards

Aaron

Aaron Olsen

Senior Consultant

D +61 2 8233 9957

E aolsen@urbis.com.au

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From: [Ginger-Rose Harrington](#)
To: [Aaron Olsen](#)
Bcc: [REDACTED]
Subject: 90-98 The Boulevard, Strathfield ACHA - Stage 2/3 Site Inspection Invitation (Our Ref#P0051207)
Date: Tuesday, 12 March 2024 11:30:00 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Good morning,

Thank you for your involvement with the Aboriginal Cultural Heritage Assessment (ACHA) for the proposed development at 90-98 The Boulevard, Strathfield in Sydney, NSW.

Urbis invites you on behalf of Pier Property Corporation to register your interest in attending an on-site meeting and inspection of the subject area. The meeting will provide the opportunity to familiarise yourself with the subject area, to discuss the cultural heritage approach and raise any cultural heritage information or concerns.

The site visit will take place at **2:00pm, Tuesday 19th March 2024**. We expect the site visit will take approximately 1 hour.

The Proponent has agreed to remuneration for one representative from each registered organisation for the site visit. Please note that the Proponent will not cover any additional time required for travel to and from the site.

If you wish to attend the site visit, **please respond** accordingly and provide the following no later than **close of business Friday 15th March 2024**.

1. Name and mobile phone number of the nominated site officer.
2. Insurances (if not already provided).
3. Schedule of rates (if not already provided).

Please provide your registration of interest and associated documentation to:

Ginger-Rose Harrington

E: gharrington@urbis.com.au

Please do not hesitate to contact us should you have any queries in relation to the provided information.

We look forward to hearing from you.

Kind regards

GINGER-ROSE HARRINGTON
CONSULTANT

D +61 2 8424 5139
E gharrington@urbis.com.au

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From: [Aaron Olsen](#)
Cc: [Sam Richards](#)
Bcc:

Subject: Santa Sabina College - Aboriginal Cultural Heritage Assessment - Draft Report
Date: Wednesday, 3 April 2024 2:02:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[01_P0051207_SantaSabina_ACHA_DRAFT_Redacted.pdf](#)

Good afternoon

Thank you again for your interest in the Aboriginal Cultural Heritage Assessment ('ACHA') of the Santa Sabina College Senior Campus at of 90-98 The Boulevard, Strathfield, NSW.

We now provide a draft ACHA report for your review and comment, in accordance with section 4.4 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW).

If you wish to provide any comments for inclusion into the report, please do so by **1 May 2024** to:

Aaron Olsen
Senior Consultant
Urbis Ltd
Level 8, 123 Pitt Street
Sydney NSW 2000
E: aolsen@urbis.com.au

If you have any questions, please do not hesitate to reach out.

Kind regards

AARON OLSEN
SENIOR CONSULTANT

D +61 2 8233 9957
E aolsen@urbis.com.au

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Learn more about our [Reconciliation Action Plan](#).

Sent from [Mail](#) for Windows

From: Aaron Olsen <aolsen@urbis.com.au>

Sent: Wednesday, April 3, 2024 2:10:26 PM

Cc: Sam Richards <sam.richards@urbis.com.au>

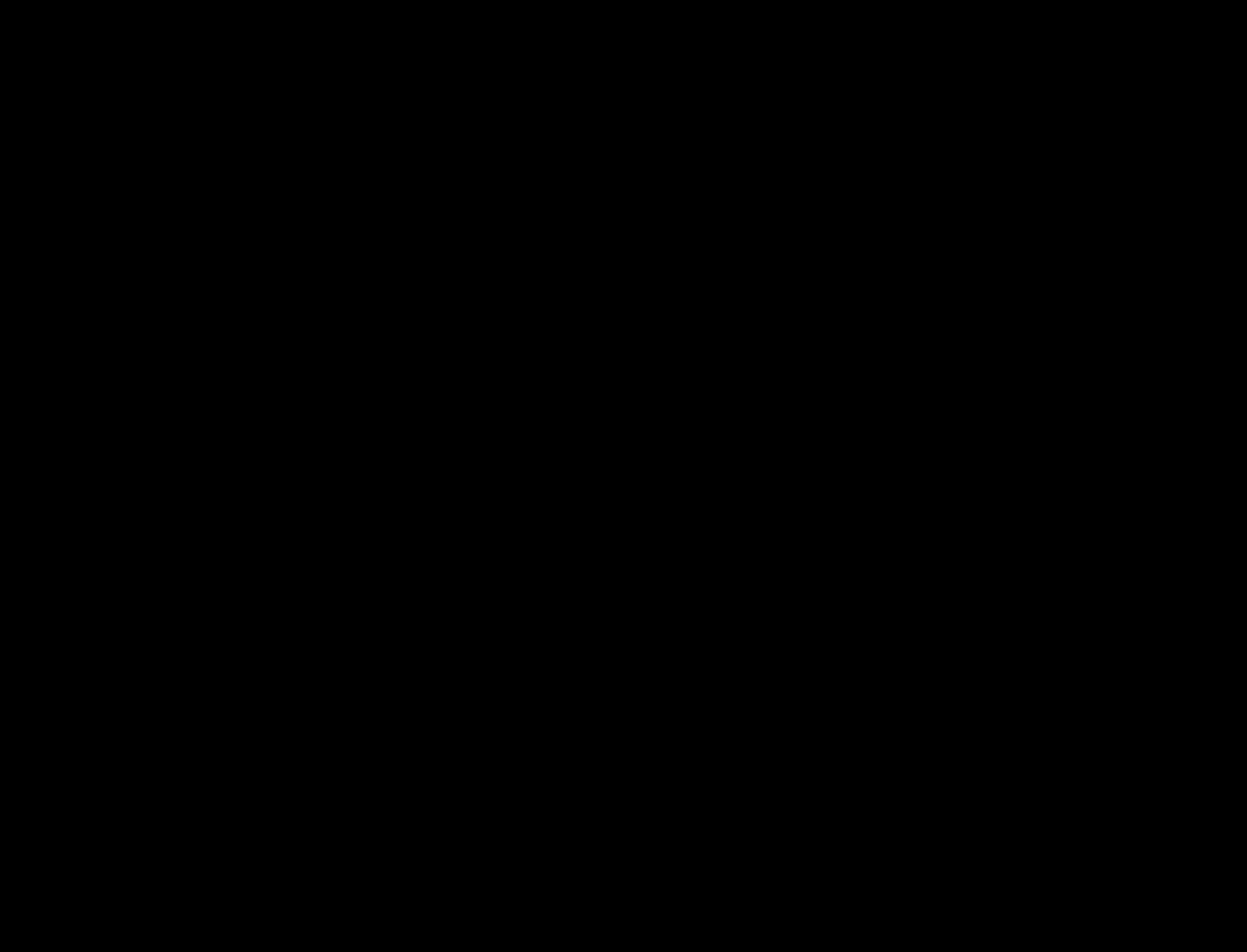
Subject: RE: Santa Sabina College - Aboriginal Cultural Heritage Assessment - Draft Report

Good afternoon

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We now provide a draft ACHA report for your review and comment, in accordance with section 4.4 of the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW).

If you wish to provide any comments for inclusion into the report, please do so by **1 May 2024** to:



From: Aaron Olsen <aolsen@urbis.com.au>

Sent: Wednesday, 3 April 2024 2:10 PM

Cc: Sam Richards <sam.richards@urbis.com.au>

Subject: RE: Santa Sabina College - Aboriginal Cultural Heritage Assessment - Draft Report

Good afternoon

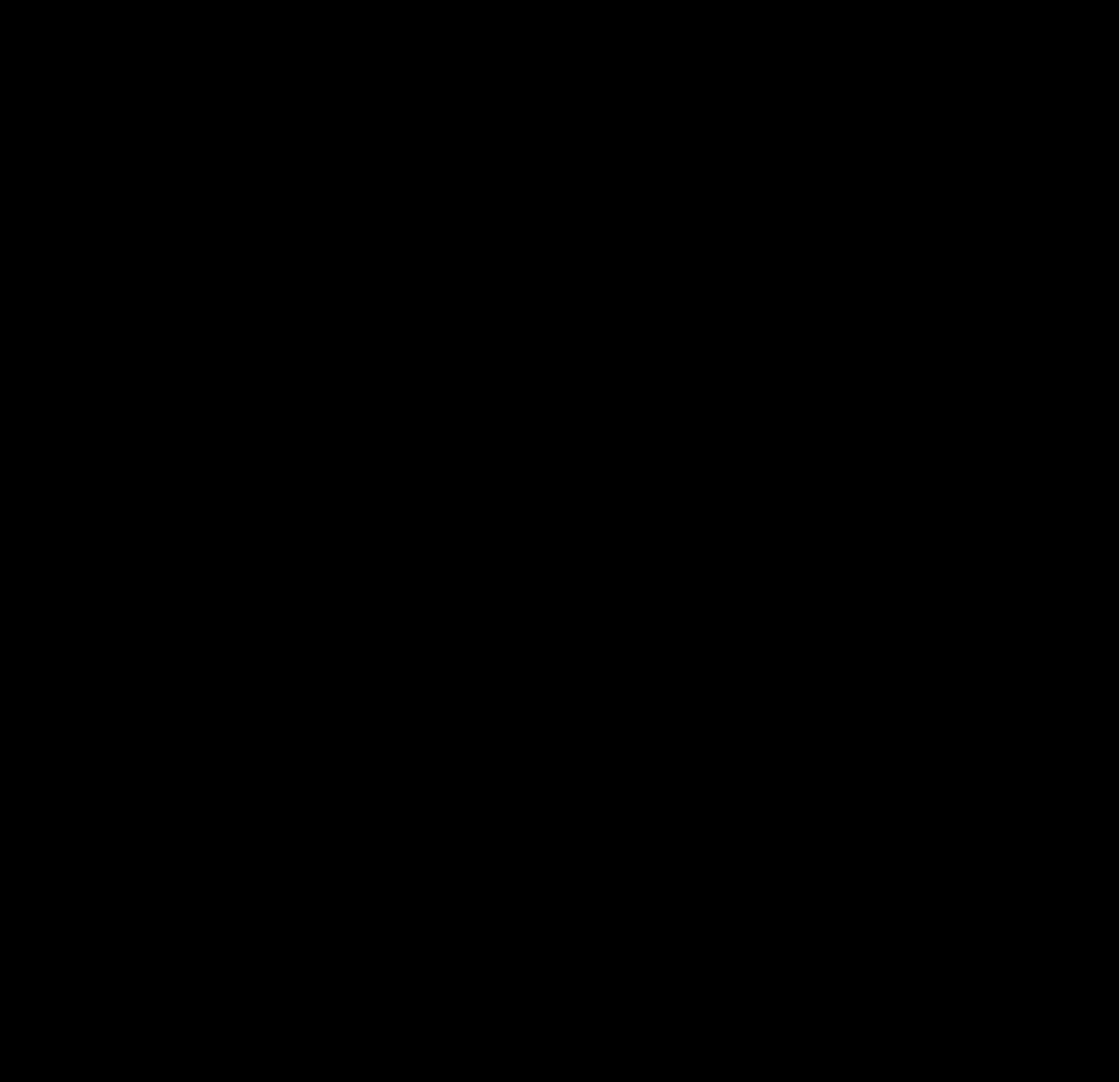
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If you have any questions, please do not hesitate to reach out.



From: Aaron Olsen <aolsen@urbis.com.au>

Sent: Wednesday, 3 April 2024 2:10 PM

Cc: Sam Richards <sam.richards@urbis.com.au>

Subject: RE: Santa Sabina College - Aboriginal Cultural Heritage Assessment - Draft Report

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If you wish to provide any comments for inclusion into the report, please do so by **1 May 2024** to:

