

The logo for URBIS, featuring the word "URBIS" in a bold, white, sans-serif font. The letters are contained within a white square frame that is partially open on the right side. A white horizontal line extends from the right side of the square frame across the top of the page.

**URBIS**

# **ABORIGINAL CULTURAL HERITAGE ASSESSMENT**

G25 Education Building  
UNSW Kensington Campus  
Kensington NSW

Prepared for  
**UNSW**  
11 December 2024

**URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:**

|                    |   |
|--------------------|---|
| Director           | Balazs Hansel, MA Archaeology, MA History, M. ICOMOS          |
| Associate Director | Ali Byrne, BA Archaeology                                     |
| Senior Consultant  | Aaron Olsen, Dip Arts (Archaeology), BSc (Hons), MIP, PhD     |
| Consultant         | Ginger-Rose Harrington, BAnchHist (Archaeology)               |
| Project Number     | P0054776  |
| Report Version     | Draft issued 5 November 2024<br>Final issued 11 December 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.**

**We also acknowledge the Traditional Custodians of the UNSW Kensington Campus, the Bidjigal and Gadigal People.**

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.


© Urbis Ltd  
50 105 256 228

All Rights Reserved. No material may be reproduced without prior permission.

You must read the important disclaimer appearing within the body of this report.

**urbis.com.au**

## CONSULTANT DECLARATION

| PROJECT DETAILS                         |   |
|---|---|
| <b>PROJECT NAME</b>                     |   |
| Application number                      | SSD-74670005  |
| Address of subject land                 | 8 High Street, Kensington, NSW, 2033  |
| Lot / DP                                | Lot 5 DP 1264171  |
| APPLICANT DETAILS                       |   |
| Applicant name                          | University of New South Wales   |
| Applicant address                       | UNSW Estate Management<br>Level 3, Mathews Building F23<br>UNSW Sydney High St<br>Kensington NSW 2052   |
| REPORT DETAILS                          |   |
| Name of report this declaration relates | Aboriginal Cultural Heritage Assessment, G25 Education Building, UNSW Kensington Campus   |
| Report reference no.                    | P0054776  |
| Report date                             | 6 December 2024   |
| Company name (inc. ABN / ACN)           | Urbis Ltd / 50 105 256 228  |
| Author name                             | Balazs Hansel, Ali Byrne, Aaron Olsen, Ginger-Rose Harrington   |
| Author qualifications                   | Balazs Hansel holds MA Archaeology and MA History; Ali Byrne holds BA Archaeology; Aaron Olsen holds Dip Arts (Archaeology), BSc (Hons), MIP, PhD; Ginger-Rose Harrington holds BAnCHist (Archaeology)  |
| Author address                          | Level 8, 123 Pitt Street, Sydney, NSW 2000  |
| DECLARATION BY CONSULTANT               |   |
| Name                                    | Balazs Hansel   |
| Registration no.                        | -   |
| Organisation registered with            | -   |
| Declaration                             | <p>The undersigned declares that this Aboriginal Cultural Heritage Assessment:</p> <ul style="list-style-type: none"> <li>has been prepared in accordance with the following policy, guidelines, or legislative requirements: <ul style="list-style-type: none"> <li><i>Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW</i> (OEH 2011b)</li> <li><i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> (DECCW 2010a)</li> <li><i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> (DECCW 2010b)</li> </ul> </li> <li>contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the Aboriginal Cultural Heritage Assessment relates;</li> <li>does not contain information that is false or misleading;</li> <li>identifies and addresses the relevant Planning Secretary's environmental assessment requirements (SEARs) for the project;</li> <li>identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments to which the Aboriginal Cultural Heritage Assessment relates;</li> <li>contains a consolidated summary of the proposed or necessary mitigation measures</li> </ul> |
| Signature                               |    |
| Date                                    | 11 December 2024  |

# CONTENTS

|  |           |
|--|-----------|
| <b>Glossary</b> .....  | <b>7</b>  |
| <b>Executive Summary</b> .....   | <b>10</b> |
| <b>1. Introduction</b> .....   | <b>12</b> |
| 1.1. Subject Area .....  | 13        |
| 1.2. Proposed Activity .....   | 13        |
| 1.3. Statutory Context .....   | 13        |
| 1.3.1. Environment Protection and Biodiversity Conservation Act 1999 ..... | 13        |
| 1.3.2. The National Parks and Wildlife Act 1974 .....                      | 14        |
| 1.4. Authorship .....  | 14        |
| 1.5. Limitations .....   | 14        |
| <b>2. Aboriginal Consultation</b> .....                                    | <b>17</b> |
| 2.1. Stage 1 – Notification and Registration .....                         | 17        |
| 2.1.1. Native Title .....  | 17        |
| 2.1.2. Identification of Cultural Knowledge Holders .....                  | 17        |
| 2.1.3. Registration of Interest .....                                      | 18        |
| 2.2. Stage 2 & 3 – Presenting and Gathering Information .....              | 18        |
| 2.2.1. Presentation of Project Information and Methodology .....           | 18        |
| 2.2.2. Site Visit and Meeting .....  | 19        |
| 2.3. Stage 4 – Review of Draft ACHA Report .....                           | 19        |
| <b>3. Desktop Assessment</b> .....   | <b>20</b> |
| 3.1. Archaeological Context .....  | 20        |
| 3.1.1. Aboriginal Land Use .....   | 20        |
| 3.1.2. Declared Aboriginal Places .....                                    | 21        |
| 3.1.3. Registered Aboriginal Objects .....                                 | 21        |
| 3.1.3.1. Identified Sites .....  | 22        |
| 3.1.3.2. Site Features .....   | 22        |
| 3.1.4. Previous Archaeological Investigations .....                        | 26        |
| 3.1.4.1. Investigations of the Subject area .....                          | 26        |
| 3.1.4.2. Regional Investigations .....                                     | 26        |
| 3.1.5. Existing Predictive Models .....                                    | 28        |
| 3.2. Environmental Context.....  | 28        |
| 3.2.1. Natural Landscape .....   | 28        |
| 3.2.2. Historical Ground Disturbance .....                                 | 33        |
| 3.3. Local & Regional Character .....                                      | 38        |
| 3.4. Archaeological Potential .....  | 38        |
| 3.4.1. Predictive Model .....  | 38        |
| 3.4.2. Assessment of Potential .....                                       | 38        |
| 3.5. Summary .....   | 39        |
| <b>4. Visual Inspection</b> .....  | <b>41</b> |
| <b>5. Significance Assessment</b> .....                                    | <b>43</b> |
| 5.1. Framework for Assessment .....  | 43        |
| 5.2. Assessment of Heritage Values.....                                    | 43        |
| 5.2.1. Social or Cultural Value .....                                      | 43        |
| 5.2.2. Historic Value .....  | 44        |
| 5.2.3. Scientific (Archaeological) Value .....                             | 44        |
| 5.2.4. Aesthetic Value.....  | 44        |
| 5.3. Statement of Significance .....                                       | 45        |
| <b>6. Impact Assessment</b> .....  | <b>46</b> |
| 6.1. Framework for Assessment .....  | 46        |
| 6.2. Assessment of Potential Harm .....                                    | 46        |
| 6.3. Inter-Generational Equity .....                                       | 47        |

|            |   |           |
|------------|---|-----------|
| 6.4.       | Avoidance & Minimisation of Harm.....                     | 47        |
| <b>7.</b>  | <b>Research Design &amp; Excavation Methodology .....</b> | <b>48</b> |
| 7.1.       | Objectives .....  | 48        |
| 7.2.       | Research Design .....                                     | 48        |
| 7.3.       | Archaeological Methodology.....                           | 49        |
| 7.3.1.     | Excavation Staging.....                                   | 49        |
| 7.3.2.     | Standard Excavation Practices .....                       | 49        |
| 7.3.2.1.   | Sampling.....   | 49        |
| 7.3.2.2.   | Notification .....  | 49        |
| 7.3.2.3.   | Stage 1 Archaeological Monitoring.....                    | 50        |
| 7.3.2.4.   | Stage 2 Mechanical Excavation .....                       | 50        |
| 7.3.2.5.   | Stage 3 Manual Excavation.....                            | 50        |
| 7.3.2.6.   | Sieving.....  | 51        |
| 7.3.2.7.   | Archaeological Recording .....                            | 52        |
| 7.3.2.8.   | Artefact Analysis.....                                    | 52        |
| 7.3.2.9.   | Care and Control .....                                    | 52        |
| 7.3.2.10.  | Reporting .....   | 52        |
| 7.3.2.11.  | Occupational Health and Safety.....                       | 53        |
| 7.3.3.     | Excavation Team.....                                      | 53        |
| 7.4.       | Post-Excavation .....                                     | 54        |
| 7.5.       | Unexpected Finds Procedures .....                         | 54        |
| 7.5.1.     | Unexpected Finds Procedure: Archaeological Material ..... | 54        |
| 7.5.2.     | Unexpected Finds Procedure: Human Remains .....           | 54        |
| <b>8.</b>  | <b>Conclusions &amp; Recommendations.....</b>             | <b>55</b> |
| <b>9.</b>  | <b>Mitigation Measures.....</b>                           | <b>57</b> |
| <b>10.</b> | <b>References .....</b>                                   | <b>59</b> |
|            | <b>Disclaimer.....</b>                                    | <b>61</b> |

|                   |   |
|-------------------|---|
| <b>Appendix A</b> | <b>Plans of Proposed Development</b>                          |
| <b>Appendix B</b> | <b>Basic and Extensive AHIMS Search Results</b>               |
| <b>Appendix C</b> | <b>Registered Aboriginal Party Consultation Log</b>           |
| <b>Appendix D</b> | <b>Registered Aboriginal Party Consultation Documentation</b> |
| <b>Appendix E</b> | <b>Geotechnical Report</b>                                    |

## FIGURES

|  |    |
|--|----|
| Figure 1 – Regional location of subject area .....   | 15 |
| Figure 2 – Subject area boundary .....   | 16 |
| Figure 3 – Locations of registered Aboriginal site in AHIMS search area.....   | 24 |
| Figure 4 – Locations of registered Aboriginal site in proximity to the subject area .....  | 25 |
| Figure 5 – Topography .....  | 30 |
| Figure 6 – Soil landscapes and hydrology.....  | 31 |
| Figure 7 – Detail of “Plan Shewing Present Water Supply and Proposed Improvements, 1869”,<br>indicating the location of the subject area (in red) in relation to the nearby swamp east of Botany Road..... | 32 |
| Figure 8 – Detail of map of the ‘Parish of Alexandria’ from 1900 showing the location of the subject<br>area (red outline) within the Benevolent Asylum reserve (shaded pink) .....                        | 34 |
| Figure 9 – Detail of map of the ‘Parish of Alexandria’ from 1913 showing the location of the subject<br>area (red outline) located within ‘Randwick Park’ (shaded green) .....                             | 34 |
| Figure 10 – Aerial image of subject area (red outline), 1961 .....   | 35 |
| Figure 11 – Aerial image of subject area (red outline), 1971 .....   | 35 |
| Figure 12 – Aerial image of subject area (red outline), 1978 .....   | 36 |

|  |    |
|--|----|
| Figure 13 – Aerial image of subject area (red outline), 2010 ..... | 36 |
| Figure 14 – Historical ground disturbance.....                     | 37 |
| Figure 15 – Aboriginal archaeological potential .....              | 40 |

**TABLES**

|  |    |
|--|----|
| Table 1 – SEARs requirements .....   | 12 |
| Table 2 – Contacted organisations.....   | 17 |
| Table 3 – Registered Aboriginal Parties .....  | 18 |
| Table 4 – RAP attendees at site visit and meeting.....                                 | 19 |
| Table 5 – RAP comments during site visit and meeting.....                              | 19 |
| Table 6 – RAP response to the Stage 4 Draft ACHA Report .....                          | 19 |
| Table 7 – Summary of registered Aboriginal site features in the AHIMS search area..... | 23 |
| Table 8 – Mitigation Measures .....  | 57 |

# 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.   |

| <b>Term</b>          | <b>Definition</b>  |
|----------------------|--|
| 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'.  |

| <b>Term</b>                         | <b>Definition</b>  |
|-------------------------------------|--|
| 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 the University of NSW ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of the UNSW G25 Education Building, UNSW Kensington Campus, 8 High Street, Kensington NSW, legally defined as part Lot 5 in DP1264171 ('the subject area').

The Proponent is seeking approval for redevelopment of the subject area to provide a new multi-storey education building. Approval is being sought for the development under a State Significant Development Application (SSD-74670005), under Division 4.7 of the *Environmental Planning and Assessment Act 1979* (NSW). Industry-Specific Secretary's Environmental Assessment Requirements (SEARs) relevant to Tertiary Institution projects have been issued by the Department of Planning, Housing and Infrastructure (DPHI). The present ACHA has been prepared to meet Item 19 of the SEARs, issued on 15 August 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 subject area is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject area 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 area.

- **Conclusion 2 – Sensitive Landscape Features**

The entire subject area is located within a sand dune system (the Newport soil landscape) and within 200 m of water (part of the now-reclaimed Bird's Gully swamp system on the opposite side of Botany Road), both of which are considered indicative of likely past Aboriginal land use.

- **Conclusion 3 – Historical Ground Disturbance**

As confirmed by a geotechnical investigation (Douglas Partners 2024), historical ground disturbance is assessed to be moderate across most of the subject area (natural A-horizon sands of 0.2 to 1.1 thick below a depth of about 1.0 to 1.6 m), the exception being a portion on the western boundary having been subjected to high ground disturbance (no natural A-horizon).

- **Conclusion 4 – Archaeological Potential**

The Aboriginal archaeological potential of the subject area is assessed to be **High** across most of the subject area where intact natural topsoils have been found, but **Very Low** in the highly disturbed area on the western boundary.

- **Conclusion 5 – Significance Assessment**

The subject area has moderate social and cultural significance to the local Aboriginal community for its proximity to the nearby Bird's Gully swamp and associated camping sites dating to at least the early Holocene.

- **Conclusion 6 – Impact Assessment**

As the proposed ground disturbing works encompass an area of high archaeological potential, the proposed development is likely to cause direct harm to Aboriginal objects.

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-74670005.

### ▪ **Recommendation 2 – Further Archaeological Investigation**

As the proposed works are likely to cause harm to Aboriginal objects, it is recommended that further archaeological investigation be undertaken at the commencement of the proposed works, prior to construction commencing. The further archaeological investigation should comprise a subsurface Aboriginal archaeological excavation program undertaken in accordance with the Archaeological Research Design and Excavation Methodology detailed in Section 7 of this report. The subsurface excavation program should be undertaken with the participation of nominated Aboriginal RAPs and appropriately qualified archaeologists. To avoid unnecessary harm to Aboriginal objects and existing improvements and to avoid unnecessary disruption of UNSW operations, it is recommended that the subsurface excavation be undertaken after approval of SSD-74670005.

A post-excavation report should be prepared after completion of the subsurface excavation program that presents the findings excavation, provides a reassessment of the significance of the subject area and sets out further management recommendations to mitigate harm to any identified Aboriginal objects.

### **Recommendation 3 – Unexpected Finds Protocol: Archaeological Material**

In the event that any archaeological material is uncovered during any site works, the following steps must be carried out:

- (a) All works must halt in the immediate area of the find to prevent any further impacts to the archaeological material.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist and the Registered Aboriginal Parties for the ACHA must be contacted to determine the significance of the objects.
- (d) If determined to be an Aboriginal object, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided to AHIMS.
- (e) Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
- (f) The Applicant must consult with the Aboriginal community representatives, the archaeologist(s) and Heritage NSW to develop and implement management strategies for all Aboriginal objects.
- (g) Works may only recommence in the vicinity of the find with the approval of Heritage NSW.

### **Recommendation 4 – Unexpected Finds Protocol: Human Remains**

In the event that any human remains are uncovered during any site works, the following steps must be carried out:

- (a) All works must cease immediately in that area and the NSW Police and Heritage NSW contacted.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains.
- (d) The Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the human remains.
- (e) Works shall only recommence with the approval of Heritage NSW.

# 1. INTRODUCTION

Urbis was engaged by the University of New South Wales ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of the UNSW G25 Education Building, UNSW Kensington Campus, 8 High Street, Kensington NSW, legally defined as part Lot 5 in DP1264171 ('the subject area'). (Figure 1 and Figure 2).

The Proponent is seeking approval for redevelopment of the subject area to provide a new multi-storey education building, to be known as the 'UNSW G25 Education Building'. Specific details of this building are as follows:

- A 12-storey building and associated rooftop plant/servicing, with approximately 20,000 m<sup>2</sup> of gross floor area (over 12-storeys), plus basement and plant.
- Associated landscaping and public domain works.

Approval is being sought for the development via a State Significant Development Application (SSD-74670005), under Division 4.7 of the *Environmental Planning and Assessment Act 1979* (NSW). SSD-74670005 seeks approval for the construction and operation of the G25 Education Building, which involves the following:

- Site preparation works including demolition of the existing at-grade car park,
- Construction of a new Teaching and Learning Building.

The Proposal will seek to deliver improvements including:

- Providing new learning spaces for university activities to further support the growth and development of the Randwick Health and Education Precinct.
- Delivering an enhanced ground plane connection.
- Providing flexible and adaptable teaching and learning spaces.
- Creating a healthy, green, and welcoming place for students, staff and visitors.
- Creating an experience that is an open, permeable, and connected public realm.
- Creating pedestrian priority and inclusive shared public space.

For a detailed project description refer to the Environmental Impact Statement prepared by Ethos Urban.

The present ACHA has been prepared to meet Item 19 of the Planning Secretary's Environmental Assessment Requirements (SEARs) issued on 15 August 2024, which is presented in Table 1 below.

Table 1 – SEARs requirements

| Item                             | Requirement  | Documentation                       |
|----------------------------------|--|-------------------------------------|
| 19. 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. | Aboriginal Cultural Heritage 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:

- *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 area is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject area and to formulate measures for avoiding or minimising any such impacts.

## 1.1. SUBJECT AREA

The subject area is located within the University of NSW Kensington Campus at 8 High Street, Kensington NSW and is legally defined as part Lot 5 in DP1264171 (Figure 1 and Figure 2). It is located approximately 6 km south-east of the Sydney CBD and is within the City of Randwick Local Government Area ('Randwick LGA') and the administrative boundaries La Perouse Local Aboriginal Land Council ('La Perouse LALC'). It is currently zoned SP2 – Educational Establishment.

The subject area encompasses an area of approximately 5,100 m<sup>2</sup> and fronts Library Walk to the north and Chancellery Walk to the west. It is further bounded by a multistorey car park to the south and the Australian Graduate School of Management building to the east. Existing improvements include on-grade carparking, lighting and landscaping.

## 1.2. PROPOSED ACTIVITY

The proposed redevelopment of the subject area comprises the construction and operation of a teaching and learning facility to be known as the UNSW G25 Education Building.

The proposed works for which approval is sought under SSD-74670005 include:

- Site preparation works including demolition of the existing at-grade car park
- Construction of a new teaching and learning building, including:
  - A 12-storey building and associated rooftop plant/servicing, with approximately 20,000 m<sup>2</sup> of gross floor area (over 12 storeys), plus basement and plant.
  - Associated landscaping and public domain works.

Plans of the proposed development are provided in Appendix A.

## 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 area.

### 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 25 July 2024. The search did not identify any Aboriginal heritage properties or places within the curtilage of the subject area 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).

As noted in Section 1 above, the ACHA was undertaken in support of a State Significant Development Application, which seeks approval for the proposed works outlined in Section 1.2.

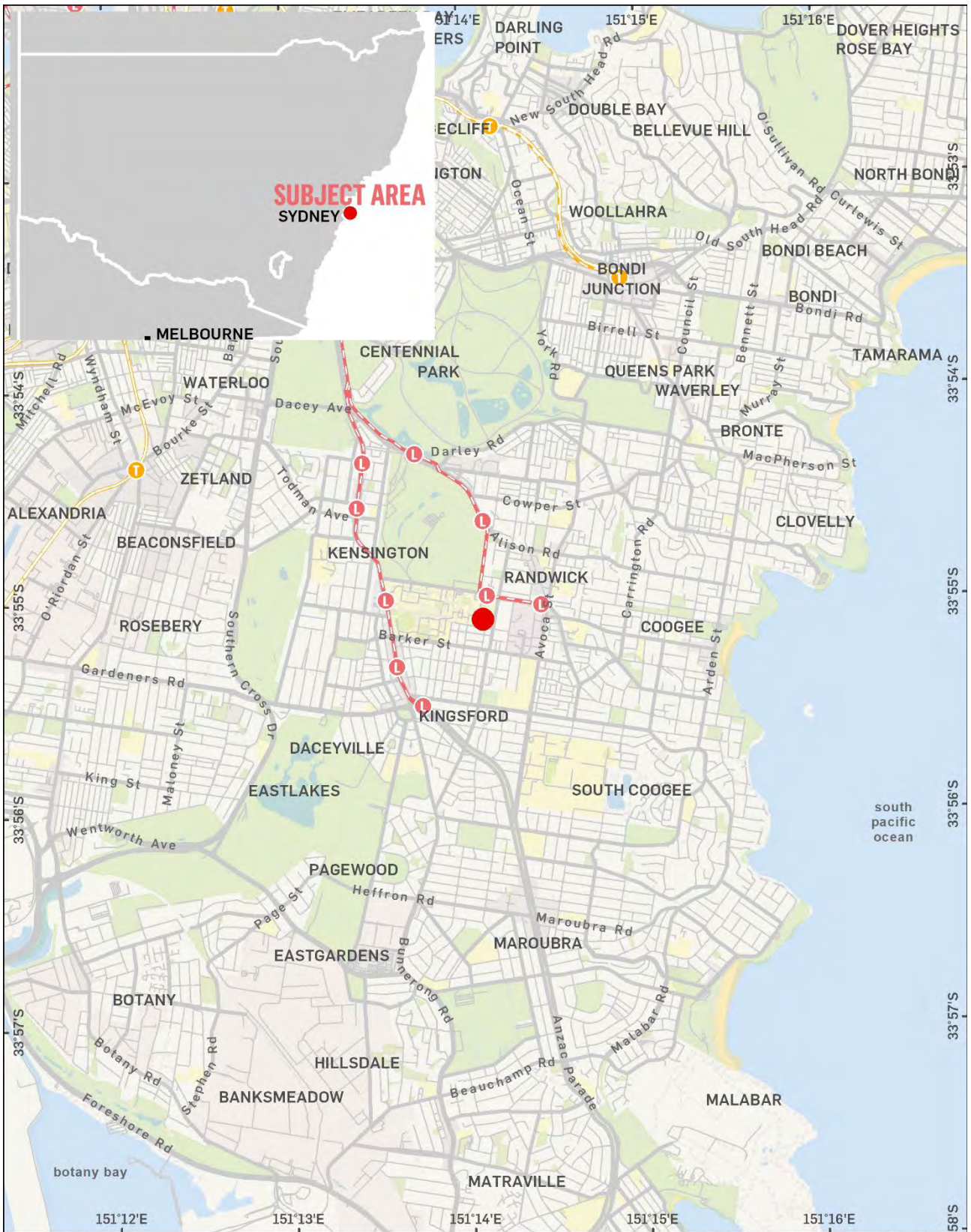
## 1.4. AUTHORSHIP

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

Ginger-Rose Harrington holds a Bachelor of Ancient History (Archaeology) from Macquarie University. Juliet Scholefield holds a Bachelor of Arts (Archaeology) and a Bachelor of Advanced Studies (Design) from the University of Sydney. 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. Ali Byrne holds a Bachelor of Arts (Archaeology) from the University of Sydney. Balazs Hansel holds a Masters (History) and Masters (Archaeology and Museum Studies) from the University of Szeged (Hungary).

## 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.



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap. Helping shape our cities, one map at a time. Jul 2024

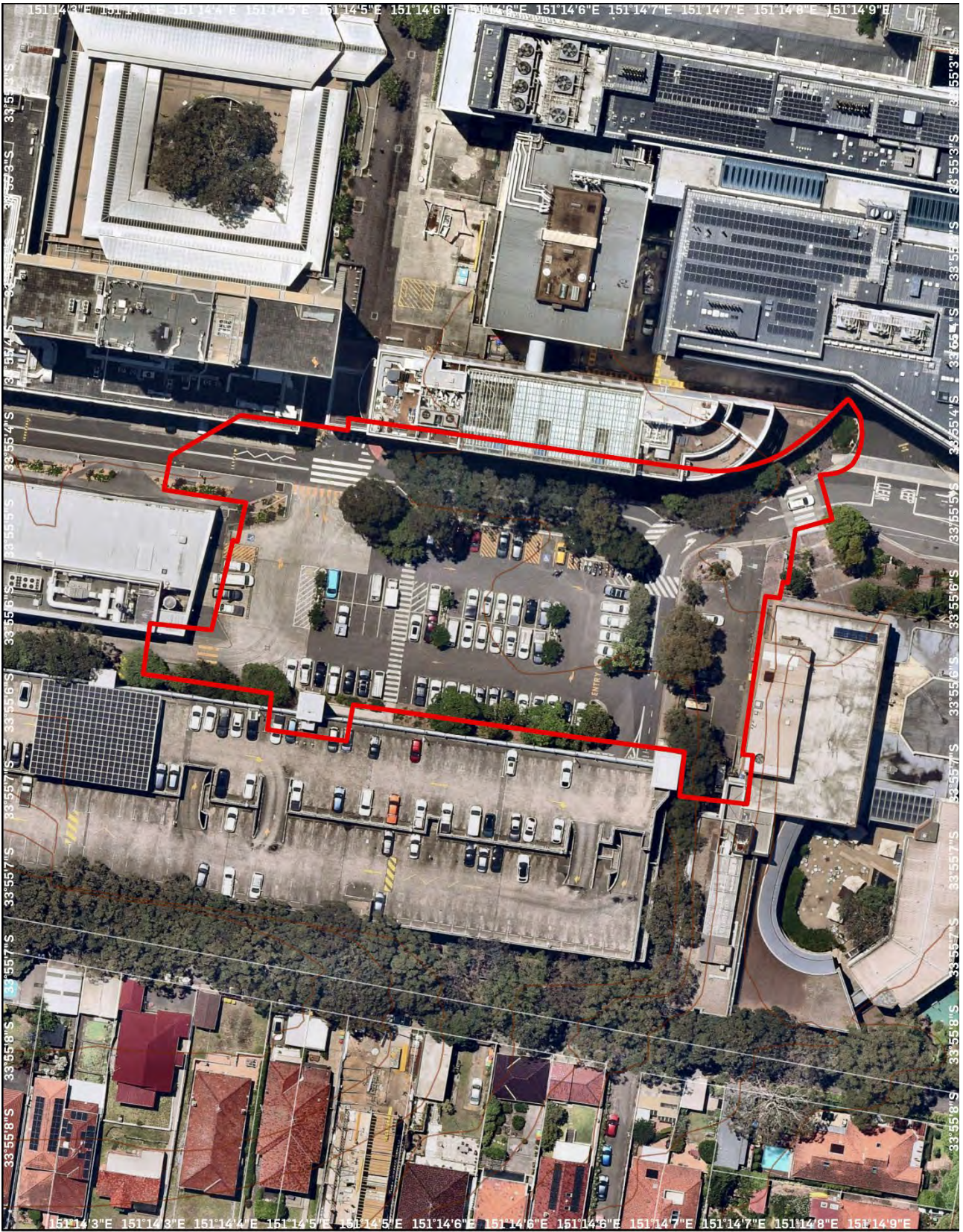


Project No: P0054776  
Project Manager: Aaron Olsen

● Subject Area

**REGIONAL LOCATION**  
UNSW G25 Development  
UNSW

Figure 1 – Regional location of subject area



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap, Nearmap. Helping shape our cities, one map at a time. Nov 2024



Project No: P0054776  
 Project Manager: Aaron Olsen

Subject Area    — Contours

**LOCATION OF THE SUBJECT AREA**  
**UNSW G25 Development**  
**UNSW**

Figure 2 – Subject area boundary

## 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 area.

#### 2.1.1. Native Title

A search of the National Native Title Tribunal (NNTT) registers and databases was undertaken on 25 July 2024. The search identified no pending Native Title claims or Native Title registrations for the subject area. The NNTT was also contacted by email on 25 July 2024 to request a formal search of the NNTT Register. A reply was received on 25 July 2024 indicating that there are no Native Title matters overlapping with the subject area.

#### 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 July 2024 (Table 2). A copy of the email sent to each of the contacted organisations is included in Appendix D. A total of 33 Aboriginal parties with a potential interest in the subject area were identified during this stage.

Table 2 – Contacted organisations

| Organisation   | Notification Sent | Response Received |
|--|-------------------|-------------------|
| Greater Sydney Local Land Services                       | 19 July 2024      | 22 July 2024      |
| Heritage NSW   | 19 July 2024      | 23 July 2024      |
| La Perouse Local Aboriginal Land Council                 | 19 July 2024      | n/a               |
| National Native Title Tribunal                           | 19 July 2024      | 19 July 2024      |
| NTS Corp   | 19 July 2024      | n/a               |
| Office of the Registrar, Aboriginal Land Rights Act 1983 | 19 July 2024      | 24 July 2024      |
| Randwick City Council                                    | 19 July 2024      | 22 July 2024      |

Letters were sent to the 33 identified Aboriginal parties by either email or mail on 1 August 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 area and set a deadline for response of 15 August 2024, providing 14 days to register an interest. A copy of the letter is included in Appendix D.

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 Kensington area. The search did not identify any local newspapers with circulation in Kensington. The public notice was therefore placed in the online classified advertisement section of the Daily Telegraph ('https://www.buysearchsell.com.au'). The advertisement was published online on 2 August 2024 and registration was open until 16 August 2024, providing the required 14 days to register an interest. A copy of the advertisement is included in Appendix C.

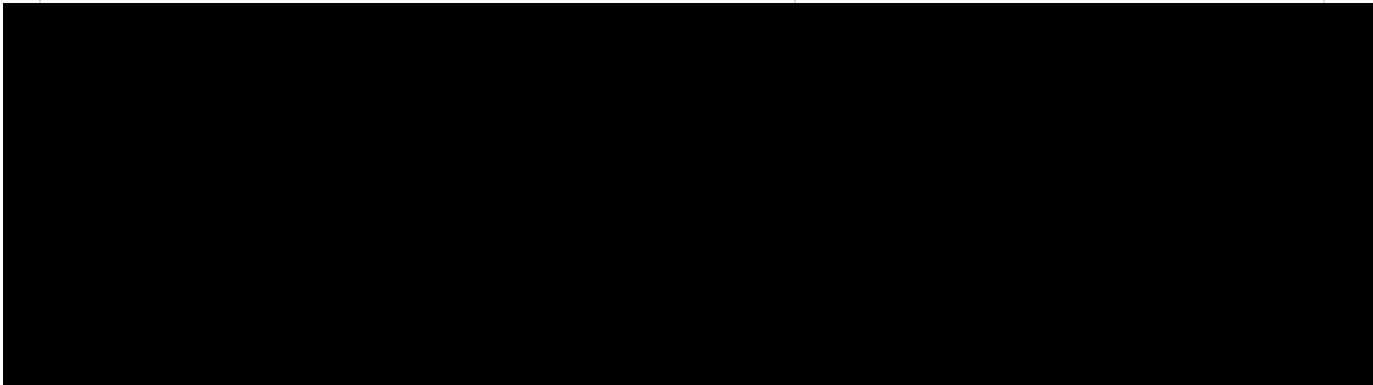
### 2.1.3. Registration of Interest

A total of five (5) Aboriginal parties registered interest in the project as a result of this phase. The La Perouse Local Aboriginal Land Council was registered despite not responding. Six (6) Aboriginal parties were therefore registered for the project (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 La Perouse Local Aboriginal Land Council on 23 August 2024 (see Appendix C).

Table 3 – Registered Aboriginal Parties

| Registered Party | Contact |
|------------------|---------|
|------------------|---------|



## 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.

### 2.2.1. Presentation of Project Information and Methodology

A Stage 2 & 3 information pack was sent to registered Aboriginal parties via email on 22 August 2024. The information pack was prepared as a combination of Stage 2 and 3 of the Consultation Guidelines, and included the following information:

- An outline of the proposal and an overview of the subject area.
- The proposed methodology for the ACHA, including the impact assessment process and input points for RAPs into the investigation and assessment.
- Critical timelines and milestones for the completion of assessment activities and delivery of reports.
- Agreed roles, functions and responsibilities.
- A request for comment on methodology, recommendations for site investigation any cultural information the respondent wished to share.

A response to the Stage 2 & 3 information pack was requested by 19 September 2023, providing 28 days to respond. A copy of the Stage 2 & 3 information pack is included in Appendix C.

No responses were received the RAPs in relation to the Stage 2 & 3 information pack.

## 2.2.2. Site Visit and Meeting

A separate communication was sent on 26 September 2024 to [REDACTED], who were randomly selected from the list of registered parties. The communication invited the RAPs to register for a site visit and meeting to be held on 30 September 2024 as part of Stage 2 & 3 of the consultation process.

The purpose of the site inspection and meeting was to conduct a thorough briefing with the RAPs about the proposed development, to conduct a walkover of the subject area with the RAPs, to discuss the information provided in the Stage 2 & 3 information pack and to discuss potential archaeological mitigation strategies.

The RAPs who attended the site visit and meeting are listed in Table 4 below. Unfortunately, due to a miscommunication, [REDACTED] the wrong location and was not able to participate in the site visit. Relevant comments received from the RAPs during the site visit and meeting are presented and addressed in Table 5 below.

Table 4 – RAP attendees at site visit and meeting

| RAP        | Representative |
|------------|----------------|
| [REDACTED] | [REDACTED]     |

Table 5 – RAP comments during site visit and meeting

| RAP        | Comment    | Urbis Response |
|------------|------------|----------------|
| [REDACTED] | [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 5 November 2024 with comment on the draft ACHAR requested by 3 December 2024, providing 28 days to respond. One response was received in relation to the Stage 4 draft ACHA report. The response is included in Appendix C and addressed in Table 6 below.

Table 6 – RAP response to the Stage 4 Draft ACHA Report

| RAP        | Comments   | Urbis Response |
|------------|------------|----------------|
| [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 area is likely to retain any unknown Aboriginal objects. The findings of the desktop assessment inform the archaeological survey of the subject area and contribute to the determining whether an archaeological test excavation is required.

### 3.1. ARCHAEOLOGICAL CONTEXT

The archaeological context of the subject area 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 area 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 51 km north-west of the present subject area, which is dated to around 36,000 years ago (Williams et al. 2014). The earliest date for an Aboriginal presence in the vicinity of the subject area is around 8,400 years ago at the Prince of Wales Hospital site, approximately 300 m southeast of the subject area (Attenbrow 2010:18; see also Section 3.1.4.2 below).

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). Given the early contact with Aboriginal people in the Sydney region, more is known about these groups than those that inhabited regional areas. Despite this, there is uncertainty about the which local Aboriginal group traditionally resided in the region around the subject area. Both the Gadigal (also known as the "Cadigal") and the Bediagal (also known as the "Bideegal") have been linked to the region immediately north of Botany Bay to Parramatta (Attenbrow 2010:22-27; Kohen 1993), which includes the present subject area. However, it has also been argued that the Bediagal lived northwest of Parramatta and that their presence near Botany Bay, reported by Tench (1793), was due to relocation after a smallpox epidemic (Attenbrow 2010:27). Regardless, the region around the subject area was likely home to generations of both Gadigal and Bediagal people, among many other groups that followed after the arrival of Europeans and displacement from the traditional lands.

The swamps and associated heath lands of the coastal fringes around the subject area provided a dynamic source of essential food resources. Utilised during short periods of habitation, the swamplands provided bountiful resources, including shellfish, plants, roots and figs. Kangaroo, possum, emus and reptiles were also hunted in the local area using double-pronged spears, while fish were caught from the local waterways using hooks and lines made from the silk of the Gorden Orb Weaving spider, dried *Lomandra* leaves and Kangaroo sinew.

As was the case throughout Australia, the local Aboriginal people of the region around the subject area 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 stone 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 local Aboriginal people are likely to have utilised the resources afforded by the local forests and waterways. Ethnographic accounts detail the heavy reliance on small bark huts for shelter

recounting that they were “formed of pieces of bark from several trees put together in the form of an oven with an entrance large enough to hold six to eight people” (Tench 1789). The ephemeral nature and perishable material from which these dwellings were built means that they are unlikely to survive in the archaeological record. By contrast, caves and overhangs provided shelter in coastal areas where Hawkesbury sandstone is exposed, typically near waterways. These shelters provide ideal conditions for preservation of evidence of Aboriginal habitation, including discarded tools and faunal material as well as engraved and pigment art.

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 area.

### 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 25 July 2024. The search did not identify any declared Aboriginal places, or any other heritage items, within the subject area.

### 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’ context 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 26 July 2024 (AHIMS Client Service ID: 913947) for an area of approximately 8 km x 8 km centred on the subject area. The search was undertaken to determine if:

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

The Basic and Extensive AHIMS search results are included in Appendix B. The results of the search are discussed below.

### 3.1.3.1. Identified Sites

A total of 59 Aboriginal sites are registered in the search area. Two of the recorded Aboriginal sites were identified as 'not a site' in the search results and two were identified as a 'reburial', reducing the total number of identified Aboriginal sites to 55. The locations of the 55 identified Aboriginal sites are shown in Figure 3.

The search did not identify any Aboriginal objects or Aboriginal places within the curtilage of the subject area.

The nearest confirmed registered sites to the subject area are located on the opposite side of Botany Road (Figure 4). These sites are described below.

- **AHIMS ID# 45-6-2495:** is a hearth site located [REDACTED]. It is recorded as 'valid' in AHIMS, but the site card indicates that it the hearth was salvaged and is therefore 'destroyed'. The hearth is recorded as being located in an aeolian sand dune associated with coastal swamps and lying 30 cm from the surface of the dune. It comprised sandstone cobbles in a circular arrangement. Although the site card indicates that the 'very little' charcoal was found in association with the heart, radiocarbon dating was able to be performed on a sample, returning a date of around 7,820 before present (BP). Subsequent thermoluminescence dating returned a consistent date of 8,400 BP ( $\pm 800$ ). As noted in Section 3.1.1 above, this is the oldest known inhabitation site in the immediate area.
- **AHIMS ID# 45-6-3727:** is a hearth site located at [REDACTED]. It is recorded as 'valid' in AHIMS, but the site card indicates that it is 'destroyed'. The hearth was exposed during mechanical excavation in the white sand A2-horizon of the eastern Sydney dune profile. The hearth consisted of white and red sandstones, ranging in size from approximately 2 to 15 cm. The fourteen white sandstone pieces were generally larger and at the centre of the hearth while the red sandstones were smaller and scattered around the periphery. Charcoal pieces were also found in association with the sandstone.

Given their distance from the subject area and the small area occupied by hearths, neither site is likely to extend into the present subject area. However, both sites establish that the immediate surrounds of the subject area were used by Aboriginal people for camping, likely as dry ground with easy access to the resources of the swamp to the east of Botany Road.

In addition to the two confirmed Aboriginal sites discussed above, three PADS were identified within 600 m of the subject area: AHIMS ID# 45-6-3342, 45-6-3728 and 45-6-3729. The location and extent of each PAD is shown in Figure 4. None of the PADs overlap with the curtilage of the present subject area.

### 3.1.3.2. Site Features

A summary of the site features spread across the registered Aboriginal sites within the search area is provided in Table 7. Among the 55 registered Aboriginal sites in the search area, a total of 58 site features were identified of six different types: art, artefacts, grinding grooves, hearths, potential archaeological deposits (PADs) and shell.

Of the confirmed sites (i.e. excluding PADs), art and artefacts are the most common. Art is present in 25% of registered sites ( $n = 14$ ) and accounts for 24% of registered site features. The high representation of art sites is consistent with the coastal location of the subject area, where exposures of Hawkesbury sandstone provide a canvas for both engraved and pigment art. Similarly, shell sites ( $n = 4$ ) and grinding grooves ( $n = 1$ ) are also found in association with the coastline.

Artefacts are present in 20% of registered sites ( $n = 11$ ) and account for 19% of registered site features. This finding is consistent with the important role of stone tools in the everyday lives of Aboriginal people discussed in Section 3.1.1 above. Artefact sites are found across the search area, but a concentration is found in association with the nearby Lachland Swamplands. Similarly, the two hearth sites mentioned in the preceding section were found at margins of a swamp. These associations indicate the importance of swamps as sources of food and are consistent with the general predictive model for NSW, which consider natural water (including swamps) to be indicative of likely past Aboriginal land use (see Section 3.1.4. below).

The contexts of the registered Aboriginal sites within the AHIMS search area are also summarised in Table 7 below. Most registered Aboriginal sites in the search area are in an open context, representing 65% ( $n = 36$ ) of all registered sites. All registered sites within the vicinity of the subject area are in an open context, consistent with the absence of rock outcrops in the swampy dune systems in which it is located (see Section 3.2.1 below).

Table 7 – Summary of registered Aboriginal site features in the AHIMS search area

| Site Features                          | Number              |                       |              | Frequency               |                            |
|--|---------------------|-----------------------|--------------|-------------------------|----------------------------|
|  | <i>Open Context</i> | <i>Closed Context</i> | <i>Total</i> | <i>% of Total Sites</i> | <i>% of Total Features</i> |
| Potential Archaeological Deposit (PAD) | 13                  | 13                    | 26           | 47%                     | 45%                        |
| Art                                    | 10                  | 4                     | 14           | 25%                     | 24%                        |
| Artefact                               | 10                  | 1                     | 11           | 20%                     | 19%                        |
| Shell                                  | 1                   | 3                     | 4            | 7%                      | 7%                         |
| Hearth                                 | 2                   | 0                     | 2            | 4%                      | 3%                         |
| Grinding Groove                        | 1                   | 0                     | 1            | 2%                      | 2%                         |

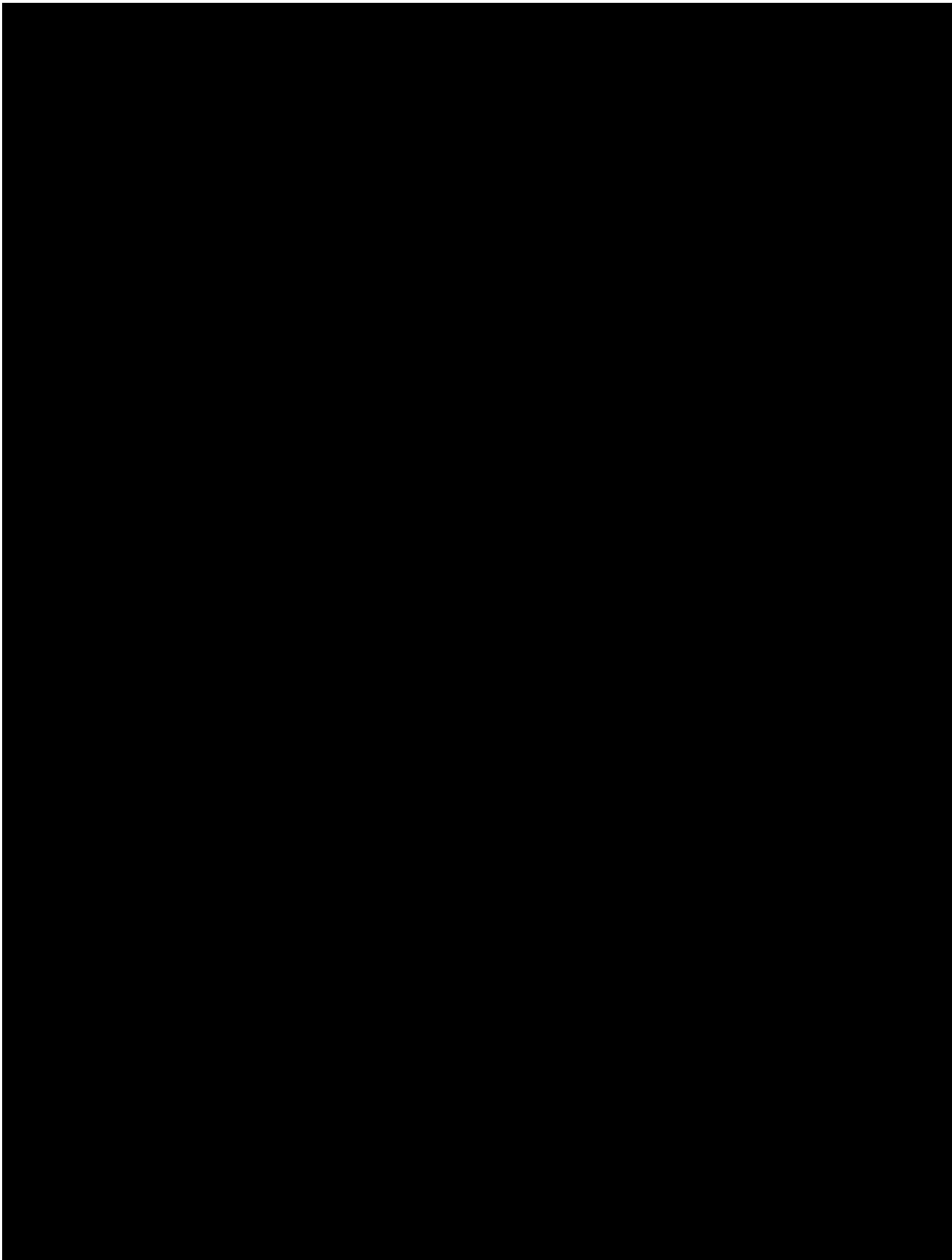


Figure 3 – Locations of registered Aboriginal site in AHIMS search area

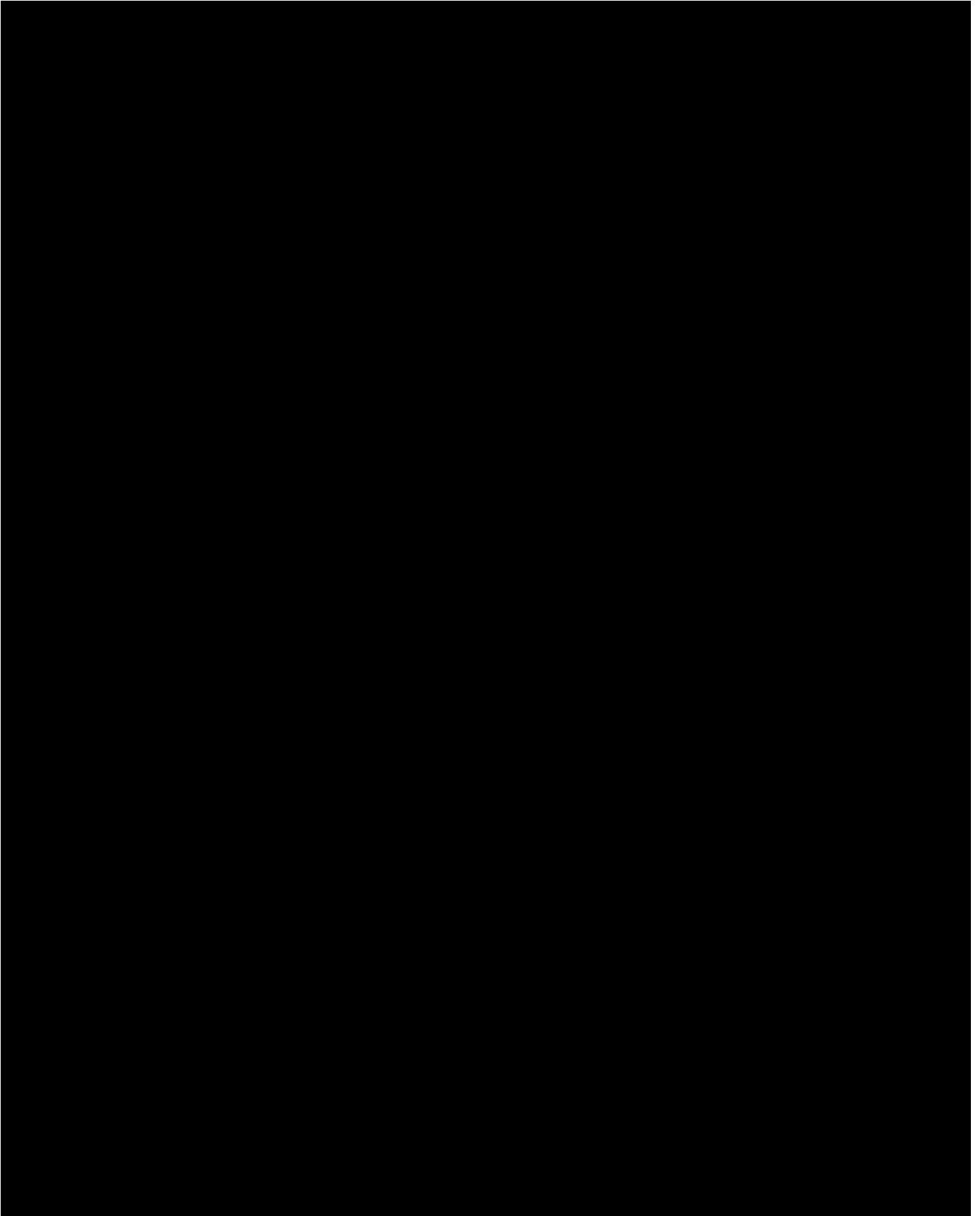


Figure 4 – Locations of registered Aboriginal site in proximity to the subject area

### 3.1.4. Previous Archaeological Investigations

Previous Aboriginal archaeological investigations undertaken within or near to the subject area 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 area.

#### 3.1.4.1. Investigations of the Subject area

No previous archaeological reports relating directly to the subject area have been identified.

#### 3.1.4.2. Regional Investigations

A review of the relevant investigations which have been undertaken within the local area is provided below. This is a non-exhaustive selection.

**Urbis (2023)** undertook an Aboriginal archaeological investigation of the Royal Randwick Racecourse Hotel, Randwick NSW approximately 500m north of the present subject area. The archaeological investigation consisted of a desktop assessment and visual inspection. The desktop assessment did not identify any known Aboriginal objects or Aboriginal places within the subject area. However, the assessment considered the potential for Aboriginal archaeological deposits within intact natural soils in the A2 Horizon at depths exceeding 1.1m-3m. This assessment was supported by earlier geotechnical investigations that confirmed the presence of a heavily truncated sand dune system overlaid by historical fill deposits to a minimum depth of 1.1m-3m. Further, previous excavations within the study area confirmed the existence of a thick, historical fill deposit layer overlying the natural sand body characteristic of the Tuggerah soil profile. The assessment noted two registered Aboriginal sites within the vicinity of the subject area found within similar deposits as the subject area, noting the potential for Aboriginal objects to remain in-situ despite the historic modification of the landscape. The visual inspection observed moderate to high degree of disturbance across the study area, however, did not observe any clear expression of Aboriginal cultural relics during this inspection. This investigation recommended that a staged archaeological excavation program be undertaken to determine the archaeological potential of the subject area.

**Coast (2019)** undertook an archaeological investigation of Building B22 within the University of New South Wales Kensington Campus, approximately 150 m north of the present subject area. The archaeological investigation consisted of a desktop assessment and site survey. The desktop assessment did not identify any known Aboriginal objects within the study area. In formulating an assessment of the likelihood of unknown Aboriginal objects being retained, the results of an earlier geotechnical assessment were considered. That assessment found that the soil profile in the study area comprised a truncated layer of sand (A-horizon) overlaying sandstone to depths of between 1.5 to 3 m. Noting that Aboriginal sites in the broader area had been found in similar deposits, the desktop assessment concluded that there was potential for Aboriginal archaeological resources to be retained as subsurface deposits within the study area. However, noting the highly developed nature of the study area, the survey found no evidence of exposed natural ground or surface expressions of Aboriginal cultural material. The report recommended an archaeological excavation program be undertaken to further investigate the possibility of Aboriginal archaeological remains being retained in the study area as subsurface deposits.

**Urbis (2019)** undertook an Aboriginal archaeological investigation of Randwick Racecourse, Leger Lawn, Randwick NSW approximately 1.3km north of the present subject area. The archaeological investigation consisted of a desktop assessment and visual inspection. The archaeological investigation did not identify any known Aboriginal objects or Aboriginal places within the subject area. A geotechnical investigation of the subject area confirmed the presence of an intact sandy soil profile underlying 1.3m of imported fill throughout the site, with soils extending to a depth of 18m. However, previous historical land use activities including demolition, may have resulted in the disturbance in the level of the water table, which had the potential to impact the integrity of any archaeological remains that may have been retained. Further, noting the archaeological sensitivity of the subject area within a consolidated aeolian sand body, the investigation concluded that the subject area held potential for the retention of Aboriginal objects. It was therefore recommended that archaeological monitoring and a staged excavation program be undertaken to establish the presence or absence of Aboriginal objects within the study area.

**Coast (2018)** undertook an Aboriginal archaeological investigation of Building D14, University of NSW Kensington Campus, approximately 300m west of the present subject area. The archaeological investigation was limited to a brief desktop assessment. The desktop assessment did not identify any known Aboriginal objects or Aboriginal places within the subject area. The investigation identified the eastern portion of the study area as comprising a natural sandy dune layer approximately 3m-15m in thickness, overlaying a layer of

bedrock. Further, the western portion of the study area was found to encompass the swampy flats of the Lachlan Swamp catchment. Due to the archaeological sensitivity of the dune system and the Lachlan swamp catchment, the study area was found to possess archaeological potential within these sections of the site. A program of monitoring was recommended during construction works to ensure the appropriate management of archaeological finds.

**Mary Dallas Consulting (2018)** undertook an Aboriginal Cultural Heritage Assessment of the parcel of land immediately to the east of the present subject area, bounded by Botany Street, High Street, Hospital Street and Magill Street. The archaeological component of the study was limited to a desktop assessment. The desktop assessment did not identify any known Aboriginal objects within the study area. However, the assessment considered it possible that Aboriginal archaeological deposits could remain in partially truncated A2-horizons of the natural Tuggerah soil. Mapping undertaken as part of the desktop assessment located the study area within and on the margins of the Bird's Gully swamp. Consequently, the study area was considered to be of high archaeological sensitivity for its potential to contain subsurface archaeological material associated with utilisation of the swamp. It was therefore recommended that prior to the commencement of demolition or earthworks within the subject land a limited archaeological excavation program be undertaken followed by archaeological monitoring of the removal of all-natural soil profiles. Although not included in the report, subsequent excavation uncovered a hearth, registered as AHIMS ID# 45-6-3727.

**GML (2017)** undertook an Aboriginal archaeological investigation of 4-18 Doncaster Avenue, Kensington NSW, approximately 1.3km northwest of the present subject area. The archaeological investigation consisted of a desktop assessment and visual inspection. The subject area was found to contain one PAD (AHIMS ID#45-6-3245) and one registered Aboriginal object (AHIMS ID# 45-6-3246). The retention of Aboriginal relics within the subject area was found to increase the likelihood of further Aboriginal objects within the vicinity of the registered PAD. Spatial mapping undertaken as part of the desktop assessment indicates the location of the study area as being within the Lachlan Swamp catchment, a region likely subject to intensified Aboriginal land use and of high archaeological sensitivity. Earlier geotechnical investigations indicate that the study area is composed of up to 1m-2m of historical fill deposits at the southern end with sand and silty sand deposits extending to depths of at least 15m across the entire site. Previous archaeological programs within the study area identified the instability of the dune sands within the B-Horizon at a depth of 2m. The investigation concluded that at least 10m of the upper soil profile should be regarded as archaeologically viable. It was therefore recommended that a program of salvage excavation and archaeological monitoring to be undertaken to conserve both the PAD and registered Aboriginal object.

**Mary Dallas Consulting (2012)** undertook an Aboriginal archaeological investigation of the Prince of Wales Hospital, Corner of Avoca Street and High Street, Randwick NSW, approximately 500m east of the present subject area. The archaeological investigation consisted of a desktop assessment and visual inspection of the study area. The archaeological investigation did not identify any known Aboriginal objects or Aboriginal places within the subject area. The assessment identified that although the study area was in proximity to archaeologically sensitive aeolian sand deposits that no deposits were present within the site. Geotechnical investigation found that historical fill deposits of 0.5m or more were likely to be truncated by original fill deposits or directly overlay sandstone bedrock in the absence of original soil deposits. The shallow nature of soil deposits within the subject area contributed to the finding that there was a low likelihood of intact original soils across the A and B Horizon. The investigation concluded that there was low archaeological potential across the entire subject area. No further Aboriginal archaeological investigations were recommended.

**Mary Dallas Consulting (2011)** undertook an Aboriginal archaeological investigation of the 'Newmarket Complex', located approximately 300 m southeast of the present subject area and immediately south of Barker Street, Randwick. The archaeological investigation consisted of a desktop assessment and site survey. Mapping undertaken as part of the desktop assessment located the study area within and on the margins of the Bird's Gully swamp. Owing to the likely importance of this swamp to Aboriginal people, the desktop assessment determined that there was a likelihood that Aboriginal occupation remains would be retained in the least disturbed parts of the study area where the natural A-horizon of the original dune system may remain. Areas of sensitivity were registered as a PAD (AHIMS ID# 45-6-3342). A program of archaeological test excavation and archaeological monitoring were recommended for any future development within the study area.

**AHMS (2010)** undertook an archaeological investigation of the Randwick Racecourse Stables Precinct, approximately 800m northwest of the present subject area. The archaeological investigation was limited to a desktop assessment. The archaeological investigation did not identify any known Aboriginal objects or Aboriginal places within the subject area. The assessment identified an area of high archaeological sensitivity in the northeastern section of the study area, whilst the remainder of the subject site was identified as possessing low archaeological potential. Any archaeological material present would be in the form of sub-

surface deposits associated with open artefact sites and/or evidence associated with the sand dune system. No geotechnical testing was undertaken as part of this investigation. A program of archaeological excavation was recommended for the portion of the site containing high archaeological sensitivity to determine the nature of archaeological potential.

**Mary Dallas Consulting (2008)** undertook an Aboriginal archaeological investigation of the Prince of Wales Hospital Neuroscience Research Precinct, Randwick NSW, approximately 400m southeast of the present subject area. The archaeological investigation consisted of a desktop assessment and visual inspection. The archaeological investigation did not identify any known Aboriginal objects or Aboriginal places within the subject area. The investigation identified that parts of the study area were located within an area of Aboriginal Archaeological Sensitivity, due to its location on a remnant dune system. Geotechnical investigations confirmed areas of sensitivity as the presence of remnant sections of the dune profile in the A2 Horizon overlaying an intact B1 Horizon. The absence of sensitivity was defined by the total truncation of the upper dune profile into the underlying coffee rock. Archaeological evidence was likely to be restricted to stone artefacts and remnants of hearths. A program of archaeological excavation was recommended to be undertaken within the defined area of Archaeological sensitivity.

**Austral & Godden Mackay (1995)** undertook an archaeological excavation at the site of the Destitute Children's Asylum Cemetery, within the Prince of Wales Hospital, Randwick. The study area is located approximately 150 m northeast of the present subject area on the opposite side of Botany Street. The excavation was undertaken to recover all grave goods and human skeletal remains within the area of the cemetery. During mechanical excavation, an Aboriginal hearth was found. Radiocarbon dating of charcoal recovered from a hearth stone and thermoluminescence date from an actual hearth stone provided an estimated date of around 8,000 BP. Analysis of the fats on a hearth stone indicated that the hearth was used to cook aquatic protein, possibly freshwater fish. An absence of associated shell and fishbone was attributed to poor preservation conditions in the acidic dune landscape context. The hearth was registered as AHIMS ID# 45-6-2495.

### 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 area 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.

As previously noted by Coast (2019, p. 37), there is insufficient archaeological data to allow development of a region-specific predictive model for the local area. A review of other investigations in the area found that the general model of the Due Diligence Code outlined above is typically applied.

## 3.2. ENVIRONMENTAL CONTEXT

The environment context of the subject area 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 area.

### 3.2.1. Natural Landscape

The purpose of reviewing the natural landscape of the subject area is twofold. It assists in the prediction of the intensity and nature of Aboriginal land use and deposition of archaeological material in the subject area 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 area is located on a gently sloping, lower side-slope of a north-south aligned ridge (Figure 5).

**Soils and Geology:** The NSW Soil and Land Information System (SALIS) indicates that the subject area is located mostly within the Newport soil landscape, with south-eastern corner being located in the Tuggerah soil landscape (Figure 6). The Newport soil landscape is characterised by shallow aeolian (windblown) sands on gently undulating plains to rolling rises. The soil A-horizon typically comprises up to 20 cm of loose dark brown loamy sand to sandy loam (A1) overlying up to 50 cm of bleached loose sand on lower (A2) on lower side-slopes. The Tuggerah soil landscape is characterised by gently undulating to rolling coastal dune-fields of deep aeolian sands. The soil A-horizon typically comprises around 30 cm of loose, speckled, grey-brown loamy sand (A1) overlying more than 100 cm of bleached loose sand (A2). The underlying geology of both soil landscapes is Hawkesbury Sandstone, outcrops of which may occur.

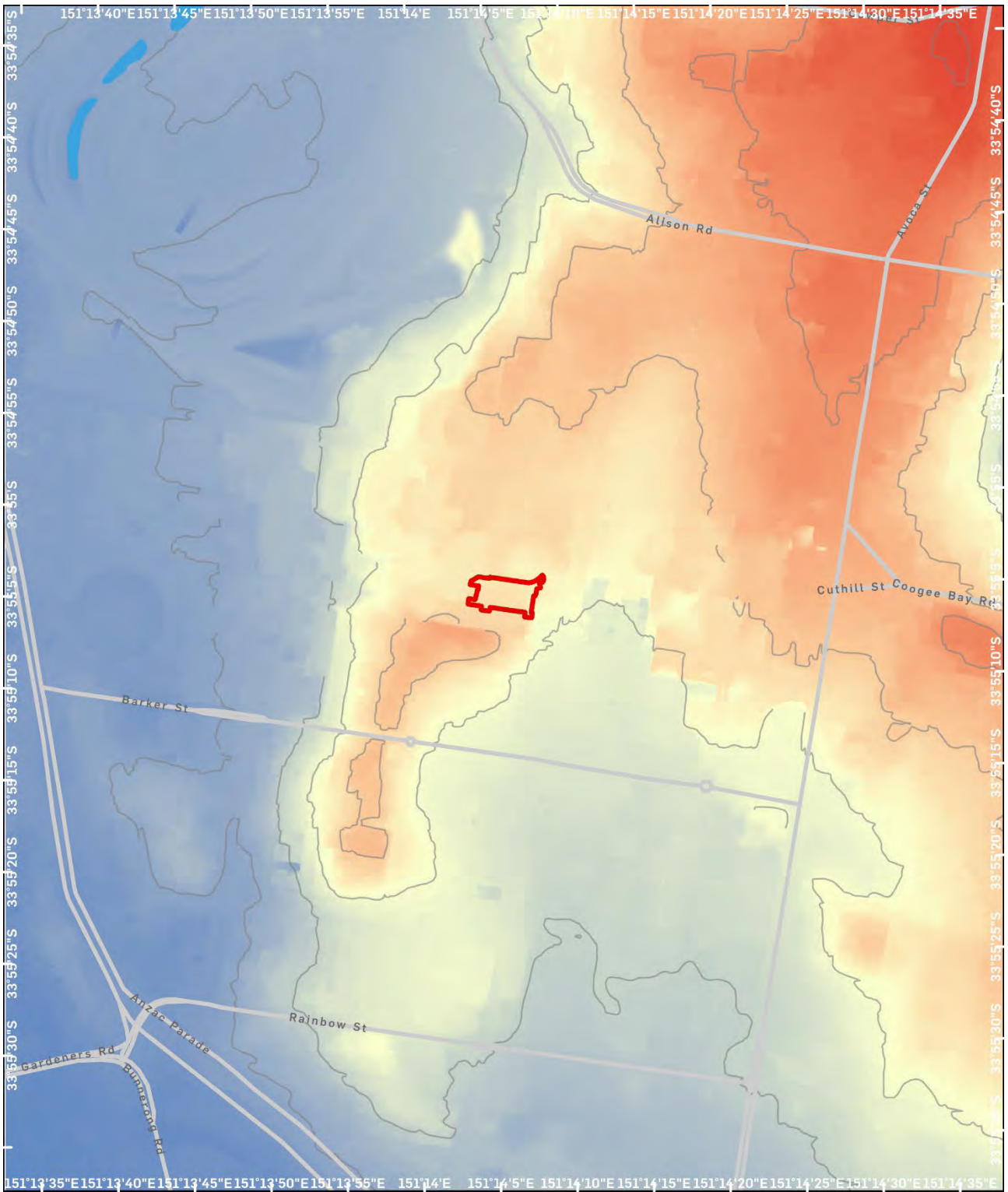
A geotechnical investigation undertaken by Douglas Partners (2024) confirms the presence of natural sand between a layer of fill and sandstone bedrock. Of 14 boreholes tested within the subject area, natural sand was encountered in all but one (BH7). The sand layer commenced at depths of between 1.3 and 2.2 m below the existing ground surface and ranged in thickness from 0.2 to 1.1 m. The findings of the geotechnical investigations are consistent with the location of the subject area in a transitional between the Tuggerah and Newport soil landscapes.

**Geomorphic Activity:** The mode of geomorphic activity in the subject area is aggradation. The Newport and Tuggerah soil landscapes have been formed by the natural deposition of the sands transported by wind. This process promotes accumulation of archaeological material in stratified deposits.

**Vegetation:** The natural vegetation of the Newport soil landscape is typified by low open-woodland, scrub and open heathland, while the Tuggerah soil landscape is characterised by dry sclerophyll tall open-woodland or forest. In both soil landscapes, smooth-barked apple (*Angophora costata*) and old man banksia (*Banksia aemula*) would have dominated, along with Sydney peppermint (*Eucalyptus piperita*) in the Tuggerah soil landscape and coastal banksia (*B. integrifolia*) and red bloodwood (*E. gummifera*) in the Newport soil landscape. Cultural markings may occur on a wide variety of tree species, including those likely to have been present in the Newport and Tuggerah soil landscapes.

**Hydrology:** The subject area was formerly located within a system of swamps extending across much of the coastal area between Centennial Park and Botany Bay, most of which have now been reclaimed. The nearest swamp to the subject area was located on the opposite side of Botany Road, less than 100m from the eastern boundary of the subject area (Figure 7). The former 'Bird's Gully swamp' sat in a depression bounded on the west by the ridge on which the subject area is located.

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.



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap. Helping shape our cities, one map at a time. Nov 2024



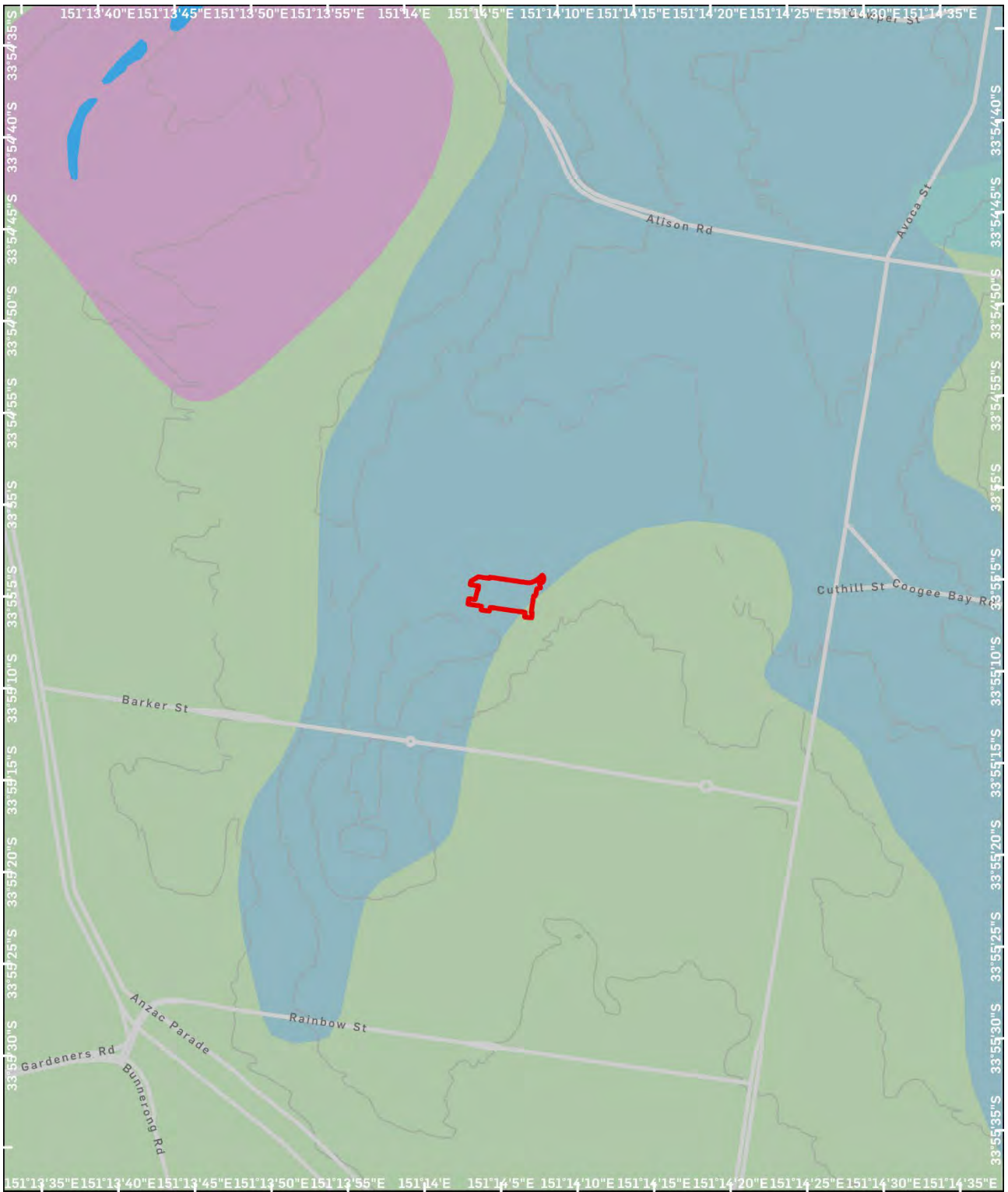
Project No: P0054776

Project Manager: Aaron Olsen

- Subject Area
  - Hydrology
  - Contours
- Elevation (m)**
- High : 81.0956
  - Low : 18.7163

**TOPOGRAPHY**  
UNSW G25 Development  
UNSW

Figure 5 – Topography



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap. Helping shape our cities, one map at a time. Nov 2024



## SOIL LANDSCAPES AND HYDROLOGY

UNSW G25 Development

UNSW

Project No: P0054776

Project Manager: Aaron Olsen

- |   |   |
|---|---|
|  Subject Area          |  DISTURBED TERRAIN (Disturbed Terrain) |
|  Hydrology             |  HAWKESBURY (Colluvial)                |
|  Hydrology 200m Buffer |  NEWPORT (Aeolian)                     |
|  Contours              |  TUGGERAH (Aeolian)                    |

Figure 6 – Soil landscapes and hydrology



Figure 7 – Detail of “Plan Shewing Present Water Supply and Proposed Improvements, 1869”, indicating the location of the subject area (in red) in relation to the nearby swamp east of Botany Road  
Source: *City of Sydney Archives, ID: A-01187732*

### 3.2.2. Historical Ground Disturbance

Disturbance to the natural landscape, either through human activity (e.g., clearing of vegetation, ploughing and construction of buildings) or natural processes (e.g., erosion), 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 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 is only 30 cm deep, but only moderate if the topsoil is 1 m deep.

Likely owing to the landscape of dunes and swamps that characterised the region, the subject area and surrounds were not included any early land grants. The subject area was included in a 47-acre parcel of land dedicated as a reserve for the Benevolent Asylum in 1864 (Figure 8). It appears the Benevolent Asylum made little use of the reserve and, in 1903, it was combined with an existing public park adjoining the northern and western boundaries of the reserve, which was rededicated as 'Randwick Park' (Figure 9).

The University of NSW acquired the subject area in the middle of the 20<sup>th</sup> century as part of its Kensington campus. An aerial image of the subject area from 1961 shows a vacant lot with some low vegetation and exposed sand in places (Figure 11). By 1971, the western portion of the subject area was being used as a carpark (Figure 12). No paving is evident, suggesting sand may have been capped loose material (e.g. soil or gravel). By 1978 the subject area was paved (Figure 13).

The following three decades saw little development of the subject area. However, in 2010, a portion of the subject area on the western boundary was impacted by ground disturbing works associated with the construction of the adjacent Solar Industrial Research Facility (G23) building. It is also apparent that the larger part of the subject area to the east had been landscaped by this time, with lighting also installed.

Based on the above, historical ground disturbing activities within the subject area have included land clearance, installation of hardstand and installation of underground services and earthworks localised along the western boundary. The earthworks are likely to have caused a high level of ground disturbance in the moderately deep (up to about 70 cm) A-horizon soils of the Newport soil landscape. The activities in the remainder of the subject area are likely to have caused a moderate degree of disturbance, removing or disturbing the upper portion of the soil A-horizon but leaving the lower portion intact. The assessed ground disturbance for the present subject area is mapped in Figure 14.

The results of the geotechnical investigation undertaken by Douglas Partners (2024) support the above assessment (Appendix E). Borehole BH7, which is located in the portion of the subject area on the western boundary that is identified as having been impacted by earthworks, found no evidence of natural soils (fill was found directly overlaying bedrock). In all other boreholes, a layer of natural sand of between .0.2 and 1.1 m thick was found between the fill layer and the sandstone bedrock, consistent with the assessment of moderate ground disturbance.

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.

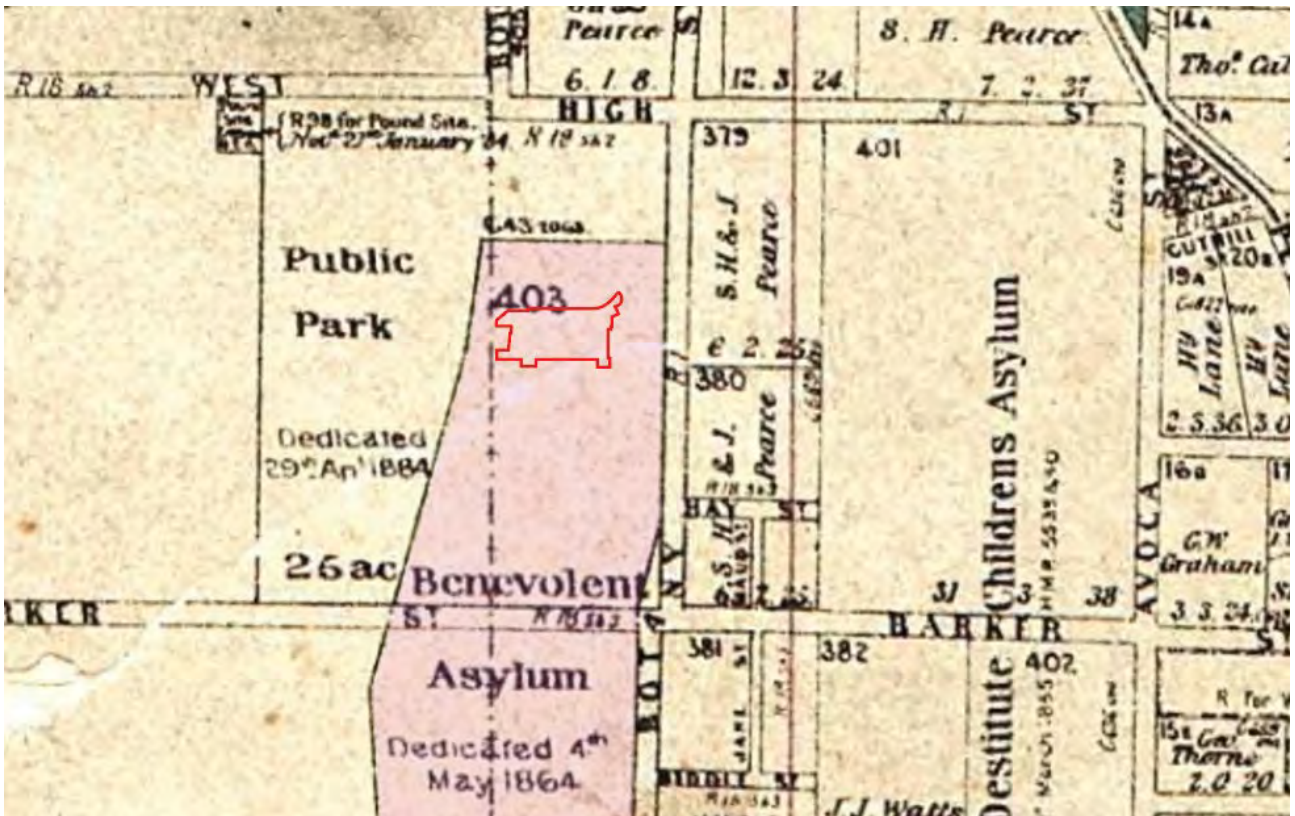


Figure 8 – Detail of map of the ‘Parish of Alexandria’ from 1900 showing the location of the subject area (red outline) within the Benevolent Asylum reserve (shaded pink)  
 Source: NSW Government, Historical Land Records Viewer

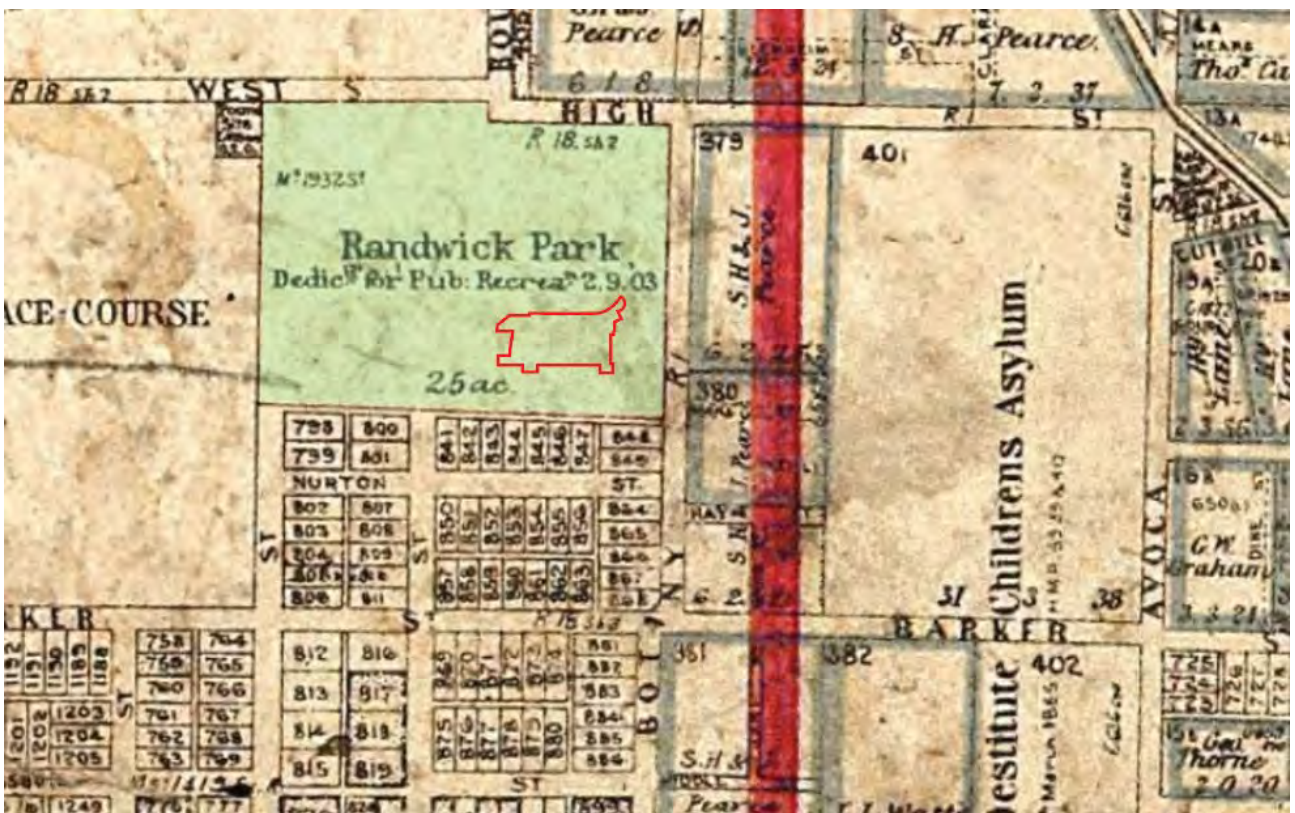


Figure 9 – Detail of map of the ‘Parish of Alexandria’ from 1913 showing the location of the subject area (red outline) located within ‘Randwick Park’ (shaded green)  
 Source: NSW Government, Historical Land Records Viewer

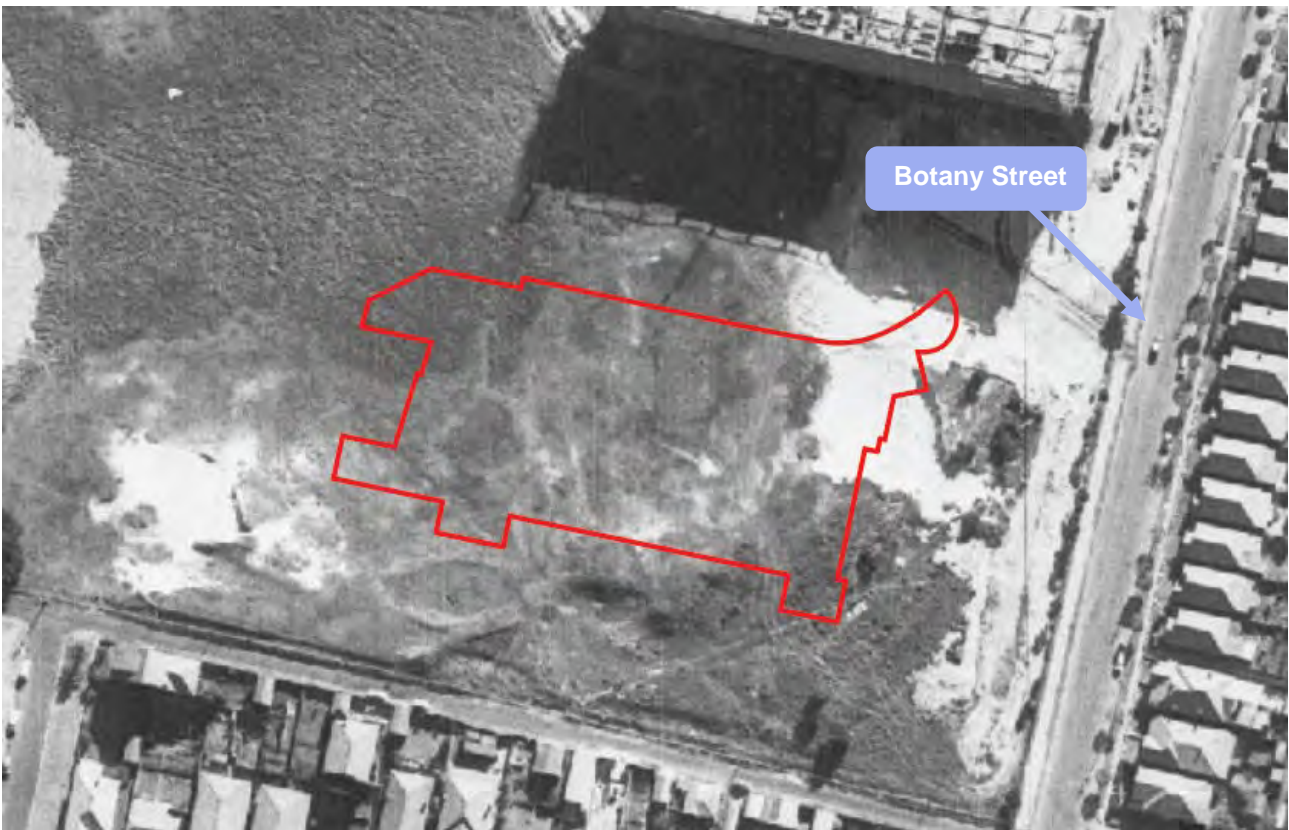


Figure 10 – Aerial image of subject area (red outline), 1961  
Source: NSW Government, Historical Imagery Viewer



Figure 11 – Aerial image of subject area (red outline), 1971  
Source: NSW Government, Historical Imagery Viewer

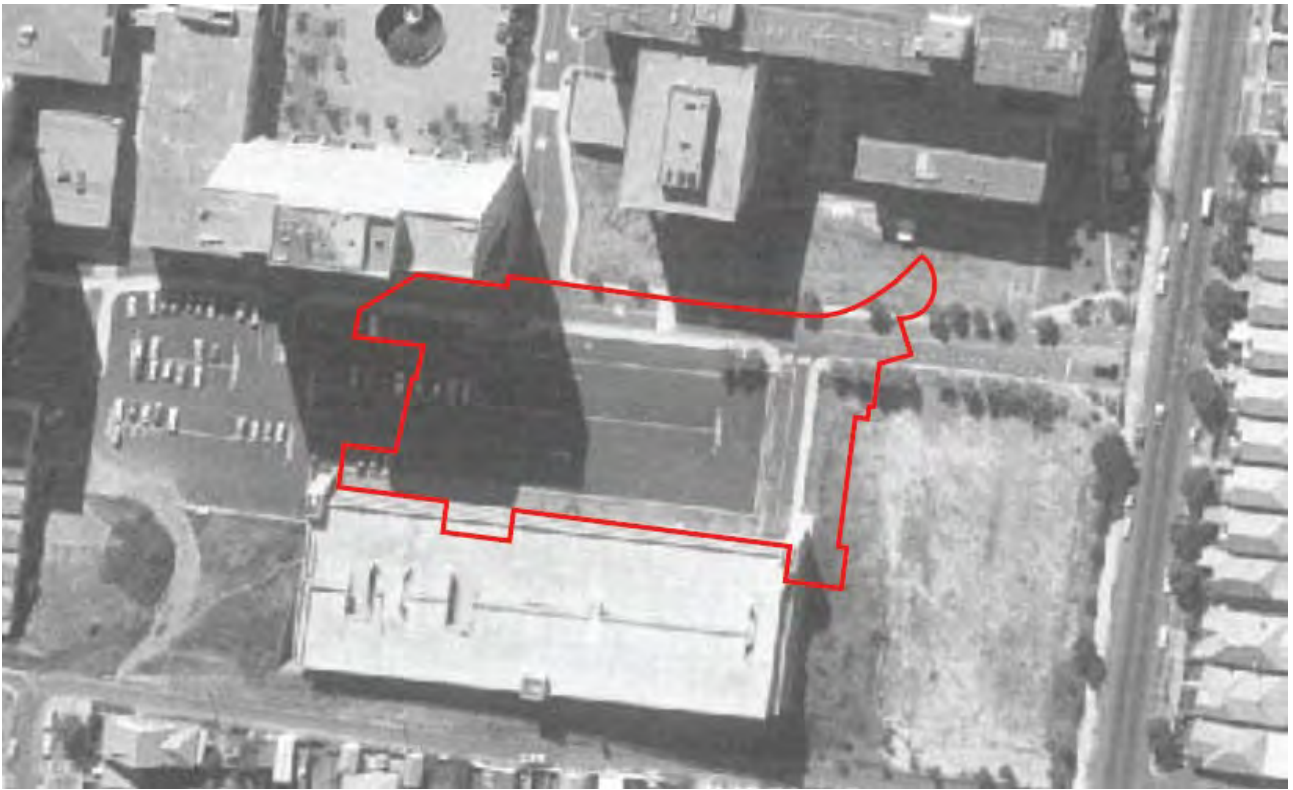
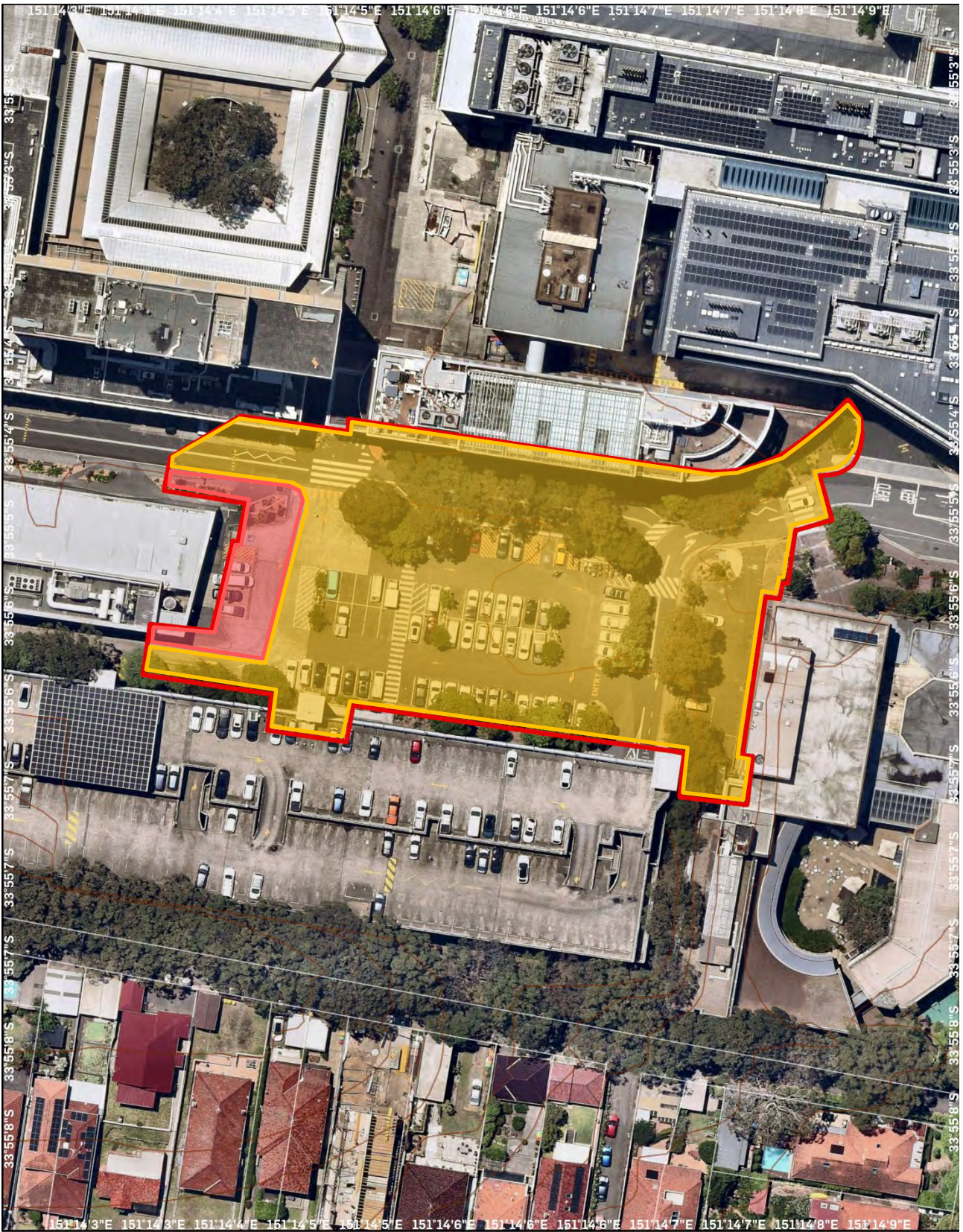


Figure 12 – Aerial image of subject area (red outline), 1978  
Source: NSW Government, Historical Imagery Viewer



Figure 13 – Aerial image of subject area (red outline), 2010  
Source: NSW Government, Historical Imagery Viewer



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap, Nearmap. Helping shape our cities, one map at a time. Nov 2024



# HISTORICAL GROUND DISTURBANCE

UNSW G25 Development  
UNSW

Project No: P0054776  
Project Manager: Aaron Olsen

- Subject Area
- Contours
- Moderate Disturbance
- High Disturbance

Figure 14 – 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 and ethnographic evidence indicates that Aboriginal land use in the local area and region was heavily reliant on water, particularly the resources provided by the swamps that covered much of the lower-lying areas of the coastal dune systems. Evidence of inhabitation, such as discarded artefacts and hearths, are likely to occur in association with these former swamplands. The ocean was also an important provider of resources. Rock exposures that occur near the coastline providing a substrate for art and grinding grooves and aiding the preservation of other deposits and shelter for inhabitation, evidenced by floor deposits of shell and artefacts.

### 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 and the local and regional character summarised above (Section 3.3).

The landscape features are considered relevant for indicating likely past Aboriginal land use in the region are those indicated in The Due Diligence Code.

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.

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:

- Artefacts are expected to be found in association with all sensitive landscape features
- Hearths are expected to be found in association with higher ground at the margins of swamps
- Shell middens are expected to be found in association with water
- Art and grinding grooves are expected to be found in association with rock exposures near water

The predictive model described above is applied in the following section to determine the Aboriginal archaeological potential of the subject area 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 area is assessed as follows.

The entire subject area is located within a sand dune system (the Newport and Tuggerah soil landscapes) and within 200 m of water (part of a now-reclaimed swamp system on the opposite side of Botany Road (Section

3.2.1), both of which are considered indicative of likely past Aboriginal land use under the predictive model presented in the preceding section. Based on known associations between Aboriginal sites and landscape features in the region and the types of Aboriginal site features in the immediate vicinity of the subject area, that land use is most likely to be materially manifested as low-density subsurface deposits of discarded stone artefacts and subsurface hearths.

Natural aggradation through aeolian transport of sand within the subject area is likely to have promoted accumulation of any deposited archaeological material. However, subsequent human activity, including land clearance, construction and demolition of buildings, installation of services and landscaping, would have disturbed or removed at least part of the natural soil A-horizon in which archaeological material is typically found.

Historical ground disturbance across most of the subject area is moderate, where a geotechnical investigation confirms the presence of a natural A-horizon (possibly truncated). A small portion of the subject area on the western boundary has been subjected to a high level of historical ground disturbance due to earthworks in 2010 associated with the construction of the adjacent G23 building.

Synthesising the above factors according to the archaeological rating scheme presented in the preceding section, it is determined that there is **High** potential for Aboriginal archaeological remains to be retained across the majority of the subject area, although in the area of high disturbance on the western boundary there is **Very Low** potential. The assessment of Aboriginal archaeological potential is mapped in Figure 15.

Likely Aboriginal site features to be retained within the subject area are artefacts and hearths based on the location of the subject area in a sand dune system near Bird's Gully swamp.

### 3.5. SUMMARY

The desktop assessment of the subject area 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 area.
- The entire subject area is located within a sand dune system (the Newport and Tuggerah soil landscapes) and within 200 m of water (part of a now-reclaimed swamp system on the opposite side of Botany Road), both of which are considered indicative of likely past Aboriginal land use.
- Natural aggradation through transportation of sands by wind is likely to have promoted retention of archaeological resources within the subject area.
- As confirmed by a geotechnical investigation (Douglas Partners 2024), historical ground disturbance is assessed to be moderate across most of the subject area (natural A-horizon sands of 0.2 to 1.1 thick below a depth of about 1.0 to 1.6 m), the exception being a portion on the western boundary having been subjected to high ground disturbance (no natural A-horizon).
- Applying the predictive model, the Aboriginal archaeological potential of the subject area is assessed to be **High** across most of the subject area, but **Very Low** in the highly disturbed area on the western boundary.



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap, Nearmap. Helping shape our cities, one map at a time. Nov 2024



Project No: P0054776  
 Project Manager: Aaron Olsen

**ARCHAEOLOGICAL POTENTIAL**  
 UNSW G25 Development  
 UNSW

Subject Area  
  Contours  
  High Potential  
  Very Low Potential

Figure 15 – Aboriginal archaeological potential

## 4. VISUAL INSPECTION

A 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 of the subject area was undertaken on 30 September 2024 by Ali Byrne (Urbis Associate Director, Archaeology) and Korri Currell (Kamilaroi Yankuntjatjara Working Group). Also present was Siobhan Hargroves (Development Manager, UNSW).

The visual inspection was undertaken in sunny conditions. Ground Surface Visibility (GSV) was estimated to be 0% across the subject area being covered by hardstand, and vegetation in landscaped garden beds.

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

The visual inspection confirmed historical ground disturbance across the entire subject area. The entirety of the subject area has been impacted by the establishment of the current carpark, in addition to existing underground services. No observable mature native trees were observed on the site. It is evident from inspection that the subject area has been modified by historical activities, with at least the upper portion of the soil A-horizon having been disturbed.

While no Aboriginal objects were identified, the presence of deep sandy soils within the site was discussed with the site team and confirmed that there was likely to be some potential for Aboriginal objects to be present at greater depths (>1m) below the surface. The RAPs in attendance were in agreement with this assessment.



Figure 15 – View west showing the ground level vs car park level, indicating presence of fill to create carpark space

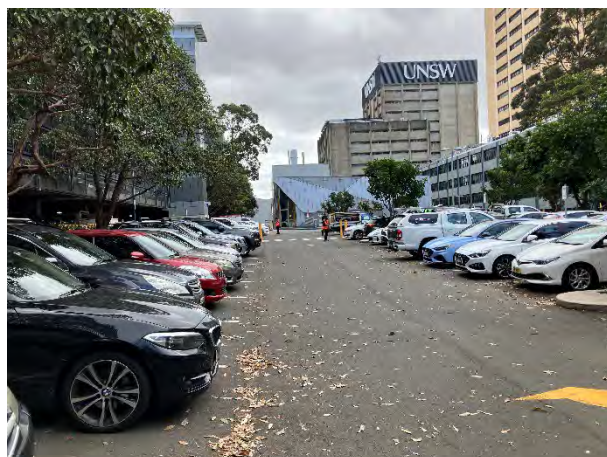


Figure 16 – View west within carpark demonstrating 0% visibility



Figure 17 – Entry to carpark, facing north



Figure 18 – Landscape garden beds along southern boundary of site



Figure 19 – View east / northeast towards Prince of Wales Hospital, from carpark



Figure 20 – Accessible entry to carpark from footpath, and landscaped garden beds

## 5. SIGNIFICANCE ASSESSMENT

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

Assessment of each 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 area) exists, what is already conserved, how much connectivity is there?*
- Rarity: *is the subject area important in demonstrating a distinctive way of life, custom, process, land-use, function or design no longer practised? Is it in danger of being lost or of exceptional interest?*
- Education potential: *does the subject area contain teaching sites or sites that might have teaching potential?*

The Aboriginal heritage significance of the subject area 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 area 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.

No written comments were received in relation to the significance of the subject area during the consultation process. However, La Perouse Local Aboriginal Land Council ('LPLALC') has previously provided comments in relation to the area immediately south of the present subject area (Urbis 2024). Specifically, LPLALC noted that the broader area is significant for its close proximity to former swamplands and as a likely campsite for Aboriginal people before the development of the subject area, noting the discovery of hearths in the adjacent Prince of Wales Hospital grounds. As noted in Sections 3.1.1 and 3.1.3.1, one of those hearths have been dated to around 8,400 BP and is one of the earliest dated sites on Sydney coastal fringe.

In view of the foregoing comments and the proximity of known camping sites, the closest being approximately 175 m to the northeast, it is clear that the subject area does have social and cultural value to the local Aboriginal community as a known camping place dating at least to the early Holocene.

### **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 area 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.

No known Aboriginal objects have been identified within the subject that would likely yield information that contributes to an understanding of the cultural or natural history of the local area or region. However, the majority of the subject area has been assessed as having high potential for retaining as yet unknown Aboriginal objects. As has been demonstrated in nearby sites, Aboriginal objects may be well-preserved for thousands of years. Any deposits relating to the early Holocene (8,000 - 11,700 BP) or Pleistocene (>11,000 BP) would have scientific value owing to the rareness of archaeological resources from these periods.

On the basis that there is high potential for archaeological resources to be retained within the subject area, the subject area is provisionally assessed as having scientific value. Should any Aboriginal objects be identified within the subject area during the proposed works, the scientific (archaeological) value of those objects should be assessed.

### **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 natural form of the subject area has been altered through land clearance, construction of on-grade carparking, installation of services and landscaping. The present visual appearance and other sensory aspects of the subject area are unlikely to resemble those of the landscape of the local area as it existed prior to European contact. The subject area 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 area that could be assessed for aesthetic value. In the event that any Aboriginal objects are identified within the subject area during the proposed works, these should be assessed for aesthetic value.

### **5.3. STATEMENT OF SIGNIFICANCE**

The subject area has moderate social and cultural significance to the local Aboriginal community for its proximity to the nearby Bird's Gully swamp and associated camping sites dating to at least the early Holocene. Owing to the proximity of both the swampland and identified hearth sites to the present subject area, it is likely that surrounding area formed a single cultural landscape characterised by utilisation of swampland resources and nearby camping on higher ground. The assessment of significance is reduced due to the absence of any known Aboriginal sites or evidence of a specific cultural association with the subject area itself and due to historical ground disturbance.

The assessment of significance should be updated in the event that any Aboriginal objects are found within the subject area during further archaeological investigation or 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 area 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 area.

The desktop assessment and site inspection identified no known Aboriginal objects within the subject area. However, the majority of the subject area has been assessed as having high Aboriginal archaeological potential.

The proposed activity includes demolition of the existing at-grade car park, construction of a multi-storey building with basement and associated landscaping, parking and public domain works. The proposed works will cause ground disturbance to depths exceeding the known depth of the surface fill layer and will be undertaken in areas where residual natural soils are known to occur, there is a high likelihood that they will cause 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 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 no known Aboriginal objects within the site, the present impacts to intergenerational equity would be considered nil. However, further archaeological investigation is required in order to determine whether Aboriginal objects are present beneath the surface layer of fill material.

### **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 area 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.

Further archaeological investigation is recommended to be undertaken prior to the proposed works as a harm minimisation strategy. The further archaeological investigation should comprise a subsurface Aboriginal archaeological excavation program undertaken in accordance with the Archaeological Research Design and Excavation Methodology detailed in Section 7 of this report. The subsurface excavation program should be undertaken with the participation of nominated Aboriginal RAPs and appropriately qualified archaeologists. To avoid unnecessary harm to Aboriginal objects and existing improvements and to avoid unnecessary disruption of UNSW operations, it is recommended that the subsurface excavation be undertaken after approval of SSD-74670005.

A post-excavation report should be prepared after completion of the subsurface excavation program that presents the findings excavation, provides a reassessment of the significance of the subject area and sets out further management recommendations to mitigate harm to any identified Aboriginal objects.

# 7. RESEARCH DESIGN & EXCAVATION METHODOLOGY

The Aboriginal archaeological test excavation recommended in Section 6 should be undertaken in accordance with the research design and excavation methodology outlined below.

## 7.1. OBJECTIVES

The objectives of the archaeological test excavation would be to:

- Investigate the nature, spatial and stratigraphical extent, condition and integrity of any Aboriginal archaeological deposits that may be present within the subject area.
- If Aboriginal archaeological deposits are identified, apply relevant research questions to interpret the finds and results in context of local and regional archaeological modelling.
- To provide information for the Registered Aboriginal Parties (RAPs) on any archaeological resources identified by the excavation.
- To provide opportunity for the RAPs to participate in the works and provide feedback and cultural heritage information throughout the process.

## 7.2. RESEARCH DESIGN

The following research design was developed to provide a framework to investigate the nature and origin of the potential archaeological resource within the subject area, based on the findings of this ACHAR.

1. What is the spatial and vertical extent of the deposit?
2. What is the integrity and condition of the deposit? How has the deposit been impacted by historical land use?
3. What are the physical attributes and compositions of the deposit (e.g. stone artefacts, features, remains of the original environment)?
4. What are the characteristics of the stone artefact assemblage? What types of artefacts are present and what specialisation if any can be detected in the assemblage?
5. Does the archaeological deposit have evidence of intra-site patterning or various occupational periods?
6. Should faunal and/or shell material be located, what species present were utilised by Aboriginal people?  
  
Can an inference be made as to a preference for marine or terrestrial resources?  
  
Is there evidence of any change over time in these preferences or species utilised?
7. How does it relate to our understanding of the environment at the time and/or is it consistent with predictive models for the area.
8. Can the archaeological deposit be interpreted in a local context?  
  
Are there similarities or differences with nearby archaeological sites?  
  
Is there evidence of connection to nearby sites in terms of raw material, composition and nature of the assemblage?
9. Can the archaeological deposit be interpreted in the regional context?  
  
Where did the raw materials originate from?  
  
Is there any indication of trade in connection with raw material procurement?  
  
How does the assemblage compare to other archaeological sites within the region?
10. Do the results of the archaeological excavation change the scientific and cultural significance of the site?

11. What is the scientific and cultural value of the assemblage?
12. How do the Aboriginal stakeholders view the cultural value of the deposit and assemblage?

## **7.3. ARCHAEOLOGICAL METHODOLOGY**

The methodology is informed by the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010) ('Code of Practice') and is tailored to the specific environmental conditions of the subject area. In particular, it addresses the challenges of excavating an area where the upper layers comprise contaminated fill exceeding depths of 2 m deep and the underlying sand deposit extending to depths exceeding 3 m.

In the event of any unforeseen circumstances, the methodology may need to be adjusted. All necessary adjustments will be discussed between the Excavation Director, Aboriginal site officer(s) and the Proponent.

### **7.3.1. Excavation Staging**

We propose to undertake the archaeological excavation in four stages:

- Stage 1 – Mechanical removal of existing concrete slab and fill material at the location of the proposed ground disturbing activities within the subject area (refer to Section 7.3.2.3)
- Stage 2 – Archaeological excavation utilising mechanical methods in 10 cm spits. If cultural material is recovered excavation will proceed to stage 3 (refer to Section 7.3.2.4).
- Stage 3 – Hand Excavation utilising standard archaeological excavation methods informed by the Code of Practice. Should archaeological deposits be recovered excavation pits will be expanded to ascertain the extent of the deposit and to salvage the cultural material (refer to Section 7.3.2.5).
- Stage 4 – Further Excavation: In the event that significant archaeological deposits are recovered across a wide area during the excavation program it may be deemed necessary to extend the excavation to further locations. The need to undertake further excavation will be assessed following completion of the initial excavation program.

Additional consultation with Heritage NSW and the RAPs may be necessary to refine and develop the excavation methodology for suitable management of archaeological resources.

### **7.3.2. Standard Excavation Practices**

#### **7.3.2.1. Sampling**

A sampling strategy must be developed to provide a framework for sampling all potential archaeological deposits (PAD) within the subject area that are at risk of harm and to describe the differentiation of the PAD to be test-excavated from the surrounding archaeological landscape (i.e. explain why the PAD is anticipated to be of higher significance than the continuous distribution of archaeological material in which it exists), and

- Test those areas of PAD that have no archaeological exposure or visibility, or
- Test the boundaries of known sites (where appropriate)
- Confirm areas of low potential (where relevant).
- Comply with the methods described in this Code
- Describe how the sampling area relates to the area that is proposed to be impacted by the proposed activity.

The sampling strategy must be documented in the Archaeological Report as set out in Requirement 11. This document (Section 7.3.2.3 to Section 7.3.2.5) outlines the proposed strategy.

#### **7.3.2.2. Notification**

At least 14 days before undertaking any test excavations, Heritage NSW must be notified, in writing, of the following:

- The location of the proposed test excavation and the subject area

- The name and contact details of the legal entity with overall responsibility for the project
- The name and contact details of the person who will be carrying out the test excavations where this is different to the legal entity with overall responsibility for the project
- The proposed date of commencement, and estimated date of completion, of the test excavations
- The location of the temporary storage location for any Aboriginal objects uncovered during the test excavations.
- A copy of the sampling strategy for test excavation must also be provided.

### **7.3.2.3. Stage 1 Archaeological Monitoring**

As part of the demolition programme for the site, archaeological monitoring would be undertaken by the archaeologist and RAPs during the removal of fill levels. Monitoring would be undertaken in accordance with the below.

- All machinery should work backwards from a slab surface in order to avoid damage to any exposed archaeological relics.
- Mechanical excavation should be undertaken by a small tonnage machine, preferably 5-tonnes, with a flat edged (mud) bucket.
- Excavation will be undertaken as shallow scrapes to assist in the identification of fill deposits and natural soils. When natural soils are reached, mechanical excavation will switch to the Stage 2 methodology, below.
- The fill above intended test pit locations will be removed in 4x4m squares due to safety and access requirements should the test pit require benching.
- Where potential historical relics are uncovered, refer to Unexpected Finds Protocol.

### **7.3.2.4. Stage 2 Mechanical Excavation**

Following the removal of the concrete slab and imported fill the excavation will proceed observing the following protocols.

- Urbis archaeologists and RAPs will mark out a series 2 m x 1 m excavation trenches in the areas of proposed ground disturbing activities (Figure 3).
- Mechanical removal of 10 cm layers within 2 m x 1 m excavation trenches.
- Soil will be kept separate for each unit and sieved through 5mm nested mesh sieves. The method of dry or wet sieving will be discussed in line with the on-site environmental requirements and the moisture content of the sand.
- Mechanical excavation will continue with this method until archaeological material is recovered.
- Should archaeological material be recovered mechanical excavation will cease and excavation will proceed with hand tools in accordance with standard archaeological process.
- Excavation of each trench will continue until the water table is breached, bedrock is encountered, or it becomes unsafe to continue.
- If no archaeological material is found at depths at which safety becomes compromised a decision will be made on the next stage of excavation program. This will be subject to discussion with the Excavation Director and RAPs based upon site specific conditions such as safety, intactness of deposit and previous finds in other excavation trenches.

### **7.3.2.5. Stage 3 Manual Excavation**

Should archaeological material be recovered mechanical excavation will cease and excavation will proceed with hand tools in accordance with standard archaeological process. Excavation utilising only hand tools will be carried out in line with the following methodology.

- Hand excavation will be undertaken within the initial 2 m x 1 m trenches as separate 1 m x 1 m excavation pits in arbitrary 10 cm spits or by stratigraphy, whichever is smaller. Pits must be excavated by hand (inclusive of trowels, spades, and other hand tools).
- Should a concentration of greater than 10 Aboriginal objects be recovered, the 1 m x 1 m excavation pits will be further divided into quadrants of 50 cm x 50 cm for greater spatial resolution.
- The excavation of each pit must continue until:
  - 2 spits of culturally sterile natural deposit up to 1.5 metres have been excavated.
  - the water table is breached.
  - bedrock is encountered.
  - unsafe to continue excavating (noting that any excavation beyond 1.5 metres depth, as measured from the cleared natural surface level, must only be undertaken where safe to do so and with appropriate safety measures in place).
- Shoring or adequate benching of pits to ensure safe excavation at depth must be undertaken as necessary. The method of benching will be decided in discussion with a geotechnical engineer to be organised by the proponent and may require hand excavation of additional 1 m x 1 m adjoining pits so not disturb intact cultural deposits.
- If any of the following are identified in a single excavation pit, the excavation must be expanded via manual salvage of adjoining 1 m x 1 m excavation pit:
  - A significant number of artefacts per pit.
  - Instances of formal tools (i.e. backed artefacts, retouched artefacts, scrapers, axes) within a single excavation pit.
  - An intact knapping floor or cultural layers, including charcoal, a heat treatment pit, hearths, or culturally deposited shells.
  - Other features agreed by the Excavations Director and RAPs present onsite as being rare in a local and/or regional context and warranting further investigation and salvage.
  - The expansion of the pit should continue until the full extent of the feature or deposit has been identified, recorded and salvaged.
- All excavated soils will be sieved through 3mm or 5mm sieves on site, as detailed in Section 7.3.2 below.
- Any archaeological material, including stone artefacts, animal bone, shell, charcoal, or other foreign material be found during the excavation or sieving will be bagged and labelled with a unique number based on the relevant square and stratigraphic layer or unit.
- Standard archaeological recording including description of excavation pits and archaeological features and finds, photographic and section or plan drawings will be done where necessary during the excavation. Soil samples will also be taken for further analysis.
- GPS coordinates for each pit will be recorded if deemed necessary.
- The spatial extent of the archaeological excavation will not exceed the proposed impact footprint.
- Archaeological excavations must cease immediately if suspected human remains are encountered at any point during the excavations. The area of these suspected remains should be immediately secured, and the human remains procedure in Section 7.5.2 must be followed.
- An amended version of this methodology may be utilised for Stage 4, if required.

### **7.3.2.6. Sieving**

All material excavated from the test excavation units must be either wet or dry sieved using a 5 mm aperture wire-mesh sieve. A 3 mm mesh should be used if substantial archaeological deposits are uncovered or if the size of artefacts encountered warrants a smaller mesh size.

### 7.3.2.7. Archaeological Recording

The archaeological excavations will be recorded using standard archaeological methods, including:

- Description of all excavation pits, archaeological features, contexts and soil profiles on pro-forma archaeological recording sheets.
- RTK or manual plotting of all excavation pits, in situ artefacts and cultural layers.
- Photographic recording of all units, archaeological features and artefacts found in-situ, with accompanying scale and descriptive signage.
- Photogrammetry recording should be considered for each pit for interpretation of the site geomorphology
- Section and plan drawings of selected excavation pits that show contextual change across the site and any encountered archaeological features.
- Aboriginal objects found will be bagged and tagged with a unique identification number corresponding to the excavation unit, depth/position found and additional details of the circumstances of the find should that be critical.

### 7.3.2.8. Artefact Analysis

Aboriginal objects that are recovered during the excavations may be analysed on-site and/or may be taken off-site for further analysis. Artefacts will be cleaned, measured and attributes recorded according to the relevant standards in line with the Code of Practice and guided by Holdaway and Stern (2004).

### 7.3.2.9. Care and Control

Any Aboriginal objects that are moved during test excavation must be reburied as soon as practicable in a secure temporary storage location in accordance with Requirement 26 pending any agreement reached as to the long-term management of the salvaged Aboriginal objects.

The person carrying out the test excavation is responsible for ensuring that procedures are put in place so that Aboriginal objects that are reburied are not harmed.

The location of the secure temporary storage location must be submitted to AHIMS with a site update record card for the site(s) in question.

All artefacts will be bagged, labelled and packaged according to the Australian Museum Artefact cataloguing standards.

All recovered archaeological material including stone artefacts, animal bone, shell, charcoal, or other foreign material will be bagged either individually or according to the excavation unit, labelled according to the unit and spit/context number. The artefacts then be placed into containers and temporarily retained by Urbis. Artefacts will be made available to ensure that Aboriginal site officers have the opportunity to inspect and share information in relation to the artefacts.

At the end of the archaeological excavation, artefacts will be temporarily retained by Urbis and placed into a lockable, secure place in Urbis' Sydney offices. Consultation with the registered Aboriginal Parties will be carried out in relation to the care and control of the recovered artefacts including the opportunity to carry out the cleaning and analysis of artefacts.

Further consultation with the RAPs is required to determine long term care and control of any Aboriginal objects excavated. Long term deposition of artefacts will be negotiated with the registered Aboriginal parties and a Care and Control Agreement will be drafted. We believe that the archaeological excavation program should be carried out first to understand the size, composition and context of the assemblage to aid the final decision.

Requirement 26 "Stone artefact deposition and storage" in the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* must be complied with.

### 7.3.2.10. Reporting

A Post Excavation Report must be prepared for the test excavation, describing the results from the investigations. The report must:

- Include a short summary of the report with a description of the site location.

- Describe any ongoing consultation with, or involvement of, representatives of RAPs in relation to the excavation.
- Provide a description of the methods of the excavation.
- Provide detailed mapping of the location of each of the excavation pits.
- Provide cross sections and photography of each pit detailing context and stratigraphy/ stratigraphic profile.
- Provide the results of the excavation including detailed soil analysis.
- Detail the count of Aboriginal objects within each excavation pit and each spit including recording those spits with nil Aboriginal objects.
- Include Artefact analysis undertaken and recorded for all recovered artefacts.
- Provide comment on concluding evidence regarding presence or absence of Aboriginal deposits or objects.
- Provide comment on the geomorphology of the site related to the results of the subsurface investigation.
- Aboriginal objects identified during the excavation program will be registered on the AHIMS data base. An Aboriginal Site Impact Recording Form will be submitted for newly impacted AHIMS sites.
- Comment on the effectiveness of any mitigation measures that were implemented
- Provide further recommendations for ongoing management of the archaeological resources
- If any Aboriginal objects were moved to a temporary storage location, a description of the nature and types of Aboriginal objects which are still at that location.
- Provide evidence of consultation undertaken with the RAPs for resolving long-term management of Aboriginal objects recovered
- Reassess the significance of the subject area in light of the results from the excavation program.
- Provide further recommendations for project in relations to the finds and construction.
- The report must be provided to RAPs once complete.
- Following RAP review, Heritage NSW will be provided with the report. Where additional excavation is required, the approach would need to be discussed and approved by Heritage NSW.

#### **7.3.2.11. Occupational Health and Safety**

The archaeological excavations will be carried out according to site-specific OH&S requirements and also in line with Urbis' internal OH&S policies. The excavation team will work under a specifically developed Safe Work Method Statement (SWMS) that will address the following:

- Description and risk assessment of day-to-day activities, including (but not limited to):
- Excavation of contaminated soil, including the presence of asbestos.
- Excavation of pits to specified maximum depth and the use of benching or shoring for stability if necessary.
- Liaise with geotechnical engineer for safe benching and/or shoring for excavation at depth.
- Working in the vicinity of heavy machinery, including mechanical excavators.
- Working in an outdoor environment.
- Recording of site attendance for the excavation team and visitors, including name, position, contact details, date of attendance and hours present.

#### **7.3.3. Excavation Team**

The Aboriginal archaeological test excavations should be undertaken by qualified archaeologists with the assistance of members of one or more of the Registered Aboriginal Parties.

## **7.4. POST-EXCAVATION**

In the event that extensive intact archaeological deposits are identified, salvage excavation may be required. A methodology for the completion of this will be prepared and approved by RAPs and Heritage NSW, prior to being completed.

## **7.5. UNEXPECTED FINDS PROCEDURES**

Where archaeological remains are uncovered or where archaeological investigations outlined in this report do not identify archaeological deposits and construction is advised to proceed, the below procedures must be incorporated into the Construction Environmental Management Plan.

### **7.5.1. Unexpected Finds Procedure: Archaeological Material**

In the event that any archaeological material is uncovered during any site works, the following steps must be carried out:

- (a) All works must halt in the immediate area of the find to prevent any further impacts to the archaeological material.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist and the Registered Aboriginal Parties for the ACHA must be contacted to determine the significance of the objects.
- (d) If determined to be an Aboriginal object, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided to AHIMS.
- (e) Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
- (f) The Applicant must consult with the Aboriginal community representatives, the archaeologist(s) and Heritage NSW to develop and implement management strategies for all Aboriginal objects.
- (g) Works may only recommence in the vicinity of the find with the approval of Heritage NSW.

### **7.5.2. Unexpected Finds Procedure: Human Remains**

In the event that any human remains are uncovered during any site works, the following steps must be carried out:

- (a) All works must cease immediately in that area and the NSW Police and Heritage NSW contacted.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains.
- (d) The Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the human remains.
- (e) Works shall only recommence with the approval of Heritage NSW.

## 8. 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 area.

- **Conclusion 2 – Sensitive Landscape Features**

The entire subject area is located within a sand dune system (the Newport soil landscape) and within 200 m of water (part of the now-reclaimed Bird's Gully swamp system on the opposite side of Botany Road), both of which are considered indicative of likely past Aboriginal land use.

- **Conclusion 3 – Historical Ground Disturbance**

As confirmed by a geotechnical investigation (Douglas Partners 2024), historical ground disturbance is assessed to be moderate across most of the subject area (natural A-horizon sands of 0.2 to 1.1 thick below a depth of about 1.0 to 1.6 m), the exception being a portion on the western boundary having been subjected to high ground disturbance (no natural A-horizon).

- **Conclusion 4 – Archaeological Potential**

The Aboriginal archaeological potential of the subject area is assessed to be **High** across most of the subject area where intact natural topsoils have been found, but **Very Low** in the highly disturbed area on the western boundary.

- **Conclusion 5 – Significance Assessment**

The subject area has moderate social and cultural significance to the local Aboriginal community for its proximity to the nearby Bird's Gully swamp and associated camping sites dating to at least the early Holocene.

- **Conclusion 6 – Impact Assessment**

As the proposed ground disturbing works encompass an area of high archaeological potential, the proposed development is likely to cause direct harm to Aboriginal objects.

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-74670005.

- **Recommendation 2 – Further Archaeological Investigation**

As the proposed works are likely to cause harm to Aboriginal objects, it is recommended that further archaeological investigation be undertaken at the commencement of the proposed works, prior to construction commencing. The further archaeological investigation should comprise a subsurface Aboriginal archaeological excavation program undertaken in accordance with the Archaeological Research Design and Excavation Methodology detailed in Section 7 of this report. The subsurface excavation program should be undertaken with the participation of nominated Aboriginal RAPs and appropriately qualified archaeologists. To avoid unnecessary harm to Aboriginal objects and existing improvements and to avoid unnecessary disruption of UNSW operations, it is recommended that the subsurface excavation be undertaken after approval of SSD-74670005.

A post-excavation report should be prepared after completion of the subsurface excavation program that presents the findings excavation, provides a reassessment of the significance of the subject area and sets out further management recommendations to mitigate harm to any identified Aboriginal objects.

- **Recommendation 3 – Unexpected Finds Protocol: Archaeological Material**

In the event that any archaeological material is uncovered during any site works, the following steps must be carried out:

- (a) All works must halt in the immediate area of the find to prevent any further impacts to the archaeological material.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist and the Registered Aboriginal Parties for the ACHA must be contacted to determine the significance of the objects.
- (d) If determined to be an Aboriginal object, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided to AHIMS.
- (e) Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
- (f) The Applicant must consult with the Aboriginal community representatives, the archaeologist(s) and Heritage NSW to develop and implement management strategies for all Aboriginal objects.
- (g) Works may only recommence in the vicinity of the find with the approval of Heritage NSW.

▪ **Recommendation 4 – Unexpected Finds Protocol: Human Remains**

In the event that any human remains are uncovered during any site works, the following steps must be carried out:

- (a) All works must cease immediately in that area and the NSW Police and Heritage NSW contacted.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains.
- (d) The Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the human remains.
- (e) Works shall only recommence with the approval of Heritage NSW.

## 9. MITIGATION MEASURES

In alignment with the recommendations of the preceding section, the following mitigation measures are proposed.

Table 8 – Mitigation Measures

| Project Stage<br><i>Design (D)</i><br><i>Construction (C)</i><br><i>Operation (O)</i> | Mitigation Measure   | Relevant Section of Report |
|---|--|----------------------------|
| C   | <p>As the proposed works are likely to cause harm to Aboriginal objects, it is recommended that further archaeological investigation prior to commencement of the proposed works. The further archaeological investigation should comprise:</p> <ul style="list-style-type: none"> <li>(a) a subsurface Aboriginal archaeological excavation program undertaken in accordance with the Archaeological Research Design and Excavation Methodology detailed in Section 7 of this report.</li> <li>(b) The subsurface excavation program should be undertaken with the participation of nominated Aboriginal RAPs and appropriately qualified archaeologists.</li> <li>(c) To avoid unnecessary harm to Aboriginal objects and existing improvements and to avoid unnecessary disruption of UNSW operations, it is recommended that the subsurface excavation be undertaken after approval of SSD-74670005.</li> <li>(d) A post-excavation report should be prepared after completion of the subsurface excavation program that presents the findings excavation, provides a reassessment of the significance of the subject area and sets out further management recommendations to mitigate harm to any identified Aboriginal objects.</li> </ul> | Section 7                  |
| C   | <p>In the event that any archaeological material is uncovered during any site works, the following steps must be carried out:</p> <ul style="list-style-type: none"> <li>(a) All works must halt in the immediate area of the find to prevent any further impacts to the archaeological material.</li> <li>(b) The find must not be moved 'out of the way' without assessment.</li> </ul>  | Section 7                  |

| <b>Project Stage</b><br><i>Design (D)</i><br><i>Construction (C)</i><br><i>Operation (O)</i> | <b>Mitigation Measure</b>   | <b>Relevant Section of Report</b> |
|--|---|-----------------------------------|
|  | <ul style="list-style-type: none"> <li>(c) A suitably qualified archaeologist and the Registered Aboriginal Parties for the ACHA must be contacted to determine the significance of the objects.</li> <li>(d) If determined to be an Aboriginal object, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided to AHIMS.</li> <li>(e) Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.</li> <li>(f) The Applicant must consult with the Aboriginal community representatives, the archaeologist(s) and Heritage NSW to develop and implement management strategies for all Aboriginal objects.</li> <li>(g) Works may only recommence in the vicinity of the find with the approval of Heritage NSW.</li> </ul> |                                   |
| <p>C</p>   | <p>In the event that any human remains are uncovered during any site works, the following steps must be carried out:</p> <ul style="list-style-type: none"> <li>(a) All works must cease immediately in that area and the NSW Police and Heritage NSW contacted.</li> <li>(b) The find must not be moved 'out of the way' without assessment.</li> <li>(c) A suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains.</li> <li>(d) The Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the human remains.</li> <li>(e) Works shall only recommence with the approval of Heritage NSW.</li> </ul>   | <p>Section 7</p>                  |

## 10. REFERENCES

- AHMS 2010, *Royal Randwick Racecourse: Proposed Stables Precinct Redevelopment Aboriginal Heritage Impact Assessment*
- Attenbrow, V 2010, *Sydney's Aboriginal Past, 2<sup>nd</sup> Edition*, University of New South Wales Press, Sydney: Australia
- Austral & Godden Mackay 1995, *Archaeological Investigation: Randwick Destitute Children's Asylum Cemetery*
- Australia ICOMOS Incorporated 2013, *The Burra Charter, The Australia ICOMOS Charter for Places of Cultural Significance*
- Botanic Gardens of Sydney 2024, *Gadigal, Sydney*, New South Wales
- Clarkson, C., Jacobs, Z., Marwick, B., Fullagar, R., Wallis, L., Smith, M., Roberts, R.G., Hayes, E., Lowe, K., Carah, X., Florin, S.A., McNeil, J., Cox, D., Arnold, L.J., Hua, Q., Huntley, J., Brand, H.E.A., Manne, T., Fairbairn, A., Shulmeister, J., Lyle, L., Salinas, M., Page, M., Connell, K., Park, G., Norman, K., Murphy, T. and Pardoe, C. 2017, *Human occupation of northern Australia by 65,000 years ago*, *Nature*, vol. 547, pp. 306-310
- Coast 2018, *Aboriginal Cultural Heritage Assessment Progress Statement for Building D14, University of NSW Main Kensington Campus, Kensington NSW*
- Coast 2019, *Aboriginal Cultural Heritage Assessment Report: B22 University of New South Wales, Kensington, Randwick LGA*
- Department of Environment Climate Change and Water (DECCW) 2010a, *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*
- DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*
- DECCW 2010c, *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*
- Douglas Partners 2015, *Report on Supplementary Technical Investigation, Biological Sciences Upgrade, University of New South Wales, Kensington*
- Environmental Planning and Assessment Act 1979* (NSW)
- Environment Protection and Biodiversity Conservation Act 1999* (Cth)
- GML Heritage 2017, *Aboriginal Cultural Heritage Assessment Report: 4-18 Doncaster Avenue, Kensington Heritage Act 1977* (NSW)
- Holdaway and Stern 2004, *A Record in Stone: The Study of Australia's Flaked Stone Artefacts*
- Mary Dallas Consulting 2008, *Prince of Wales Medical Research Institute Project: Proposed Neuroscience Research Precinct Concept Plan and Project Application, Aboriginal Archaeology Preliminary Assessment*
- Mary Dallas Consulting 2011, *Preliminary Aboriginal Archaeological Assessment: Proposed New Acute Services Building for the Prince of Wales Hospital, Randwick, NSW*
- Mary Dallas Consulting 2012, *Preliminary Aboriginal Archaeological Assessment: Prince of Wales Hospital, Randwick NSW*
- Mary Dallas Consulting 2018, *Aboriginal Cultural Heritage Assessment, New Acute Services Buildings for the Prince of Wales Hospital Randwick NSW*
- National Parks and Wildlife Act 1974* (NSW)
- National Parks and Wildlife Regulation 2019* (NSW)
- Office of Environment and Heritage (OEH) 2011a, *Applying for an Aboriginal Heritage Impact Permit guide for applicants*
- OEH 2011b, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*

Philip 1892, *Governor Philip to Lord Sydney: Government House Sydney Cove 1790*, HR NSW, Vol.1, No.2, Government Printer, Sydney, pp.293-301

Randwick City Council 2024, *Indigenous History*, Sydney, New South Wales

Tench, W 1789, "A Narrative of the Expedition to Botany Bay", Sydney University Press

Tench, W 1793, "A Complete Account of the Settlement at Port Jackson", G. Nicol and J. Sewell

Urbis 2019, *Aboriginal Cultural Heritage Assessment Report: Royal Randwick Racecourse, Leger Lawn*

Urbis 2023, *Aboriginal Cultural Heritage Assessment: Hotel SSSA Royal Randwick Racecourse, Randwick, NSW*

Urbis 2024, *Aboriginal Cultural Heritage Assessment, E25 Biolink Redevelopment, UNSW Kensington Campus*

Williams, A.N., Atkinson, F., Lau, M., Toms, P., 2014. A Glacial cryptic refuge in southeast Australia: Human occupation and mobility from 36,000 years ago in the Sydney Basin, New South Wales. *Journal of Quaternary Science*, 29(8): 735-748

# DISCLAIMER

This report is dated 11 December 2024 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd's (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of the University of New South Wales (**Instructing Party**) for the purpose of an Aboriginal Cultural Heritage Assessment (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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

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

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

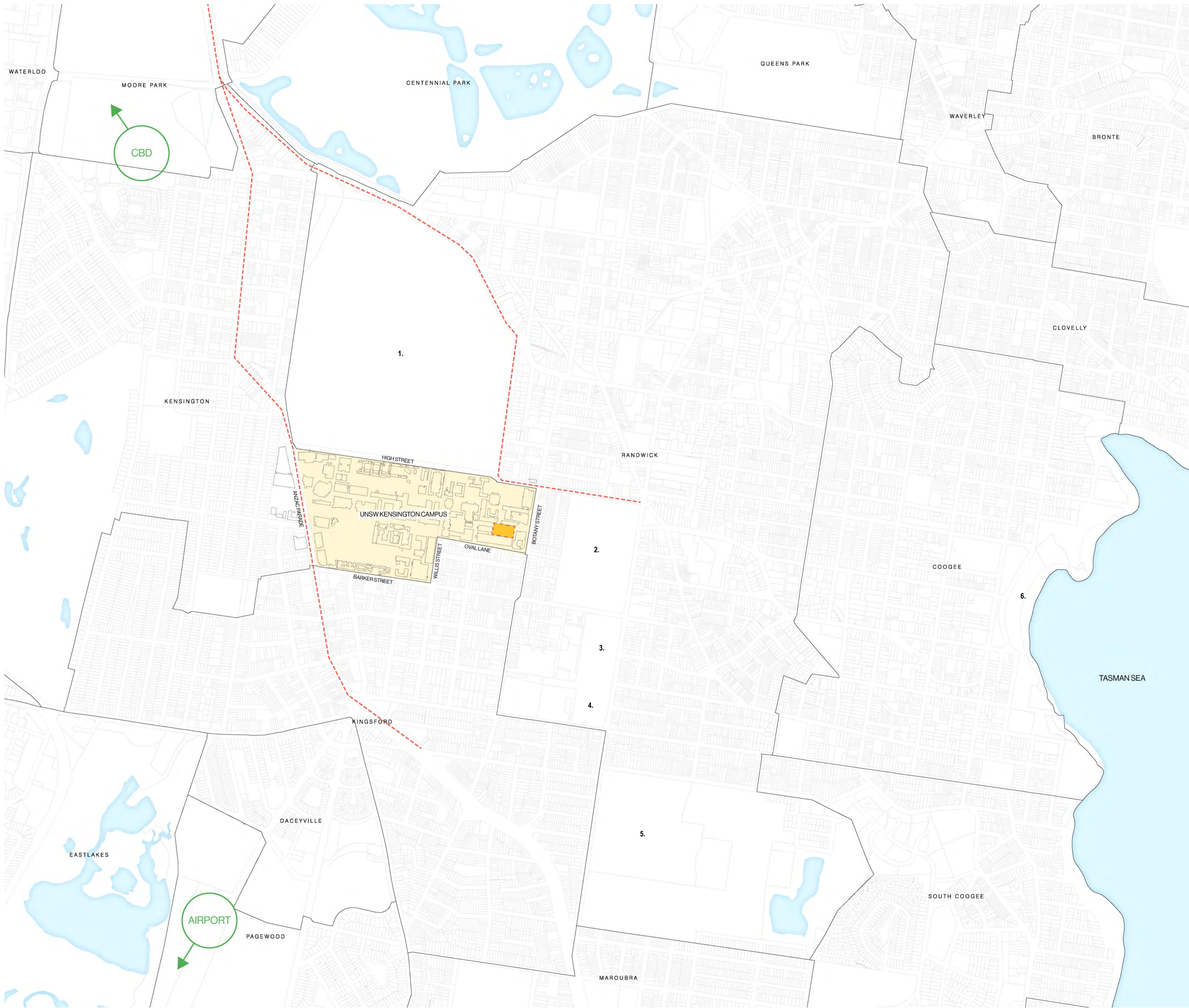
Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

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

**APPENDIX A**

**PLANS OF PROPOSED DEVELOPMENT**





architectus


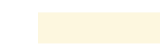

Architectus Australia Pty Ltd is the owner of the copyright subsisting in these drawings, plans, designs and specifications. They must not be used, reproduced or copied, in whole or in part, nor may the information, ideas and concepts therein contained (which are confidential to Architectus Australia Pty Ltd) be disclosed to any person without the prior written consent of that company.

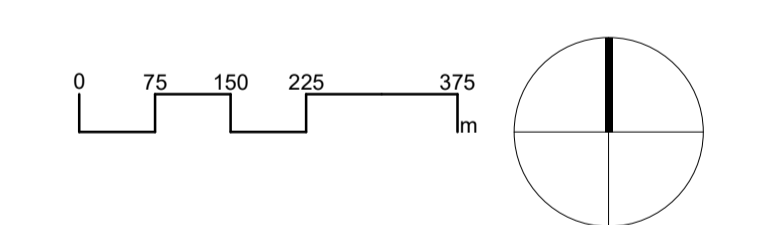
Do not scale drawings. Verify all dimensions on site

| revision | purpose of issue            | checked | date     |
|----------|-----------------------------|---------|----------|
| A.00     | ISSUED FOR TEST OF ADEQUACY | JB      | 27.11.24 |
| A.01     | ISSUED FOR SSDA             | MT      | 20.02.25 |
|          |                             |         |          |
|          |                             |         |          |
|          |                             |         |          |
|          |                             |         |          |
|          |                             |         |          |
|          |                             |         |          |
|          |                             |         |          |
|          |                             |         |          |
|          |                             |         |          |
|          |                             |         |          |
|          |                             |         |          |


- GENERAL NOTES:
- DO NOT SCALE FROM DRAWINGS. USE ONLY FIGURED DIMENSIONS. ALL DIMENSIONS ARE IN MILLIMETRES UNLESS OTHERWISE STATED.
  - REDUCED LEVELS (RL) ARE TO AUSTRALIAN HEIGHT DATUM (AHD). COORDINATES ARE TO MAP GRID AUSTRALIA (MGA).
  - ARCHITECTURAL DOCUMENTATION IS ONLY PERMITTED FOR USE ALIGNING WITH PURPOSE OF COMMISSIONING. UNAUTHORIZED USE OF THE DOCUMENTATION IS PROHIBITED.
  - INTERNAL FIT-OUT SUBJECT TO SEPARATE APPROVAL.
  - LAYOUT AND FITOUT OF EOT & AMENITIES SHOWN INDICATIVELY. SUBJECT TO DESIGN DEVELOPMENT PRIOR TO ISSUE OF DEVELOPMENT CROWN CERTIFICATE.

LEGEND

-  G25 PROPOSED LOCATION
-  UNSW KENSINGTON CAMPUS
-  LIGHT RAIL
- 1. RANDWICK RACE COURSE
- 2. RANDWICK HOSPITALS CAMPUS
- 3. RANDWICK GIRLS HIGH SCHOOL
- 4. RANDWICK BOYS HIGH SCHOOL
- 5. RANDWICK BARRACKS
- 6. COOGEE BEACH



client



**architectus™**

Australian Capital Territory  
 New South Wales  
 South Australia  
 Victoria  
 Western Australia

Gedigal Country  
 Level 17, 25 Martin Place  
 Sydney NSW 2000  
 T (61 2) 8252 8400  
 sydney@architectus.com.au  
 Nominated Architect Ray Brown 6559  
 ABN 90 131 245 684

project  
**UNSW G25 EDUCATION BUILDING**  
 KENSINGTON SYDNEY

drawing  
**CONTEXT AND LOCALITY PLAN**

scale  
 As indicated @A1

drawing no.  
**AG25-ARC-DRW-DA0010**

prepared  
 LC

approved  
 MT

project no.  
 240352.00

revision  
 1

20/02/2025 4:29:01 PM

APPROVAL





















































**APPENDIX B**

**BASIC AND EXTENSIVE AHIMS  
SEARCH RESULTS**

# AHIMS Web Services (AWS) Search Result

Your Ref/PO Number : UNSW G25

Client Service ID : 913947

Urbis Pty Ltd - Angel Place L8 123 Pitt Street

Date: 26 July 2024

Level 8 123 Angel Street  
Sydney New South Wales 2000

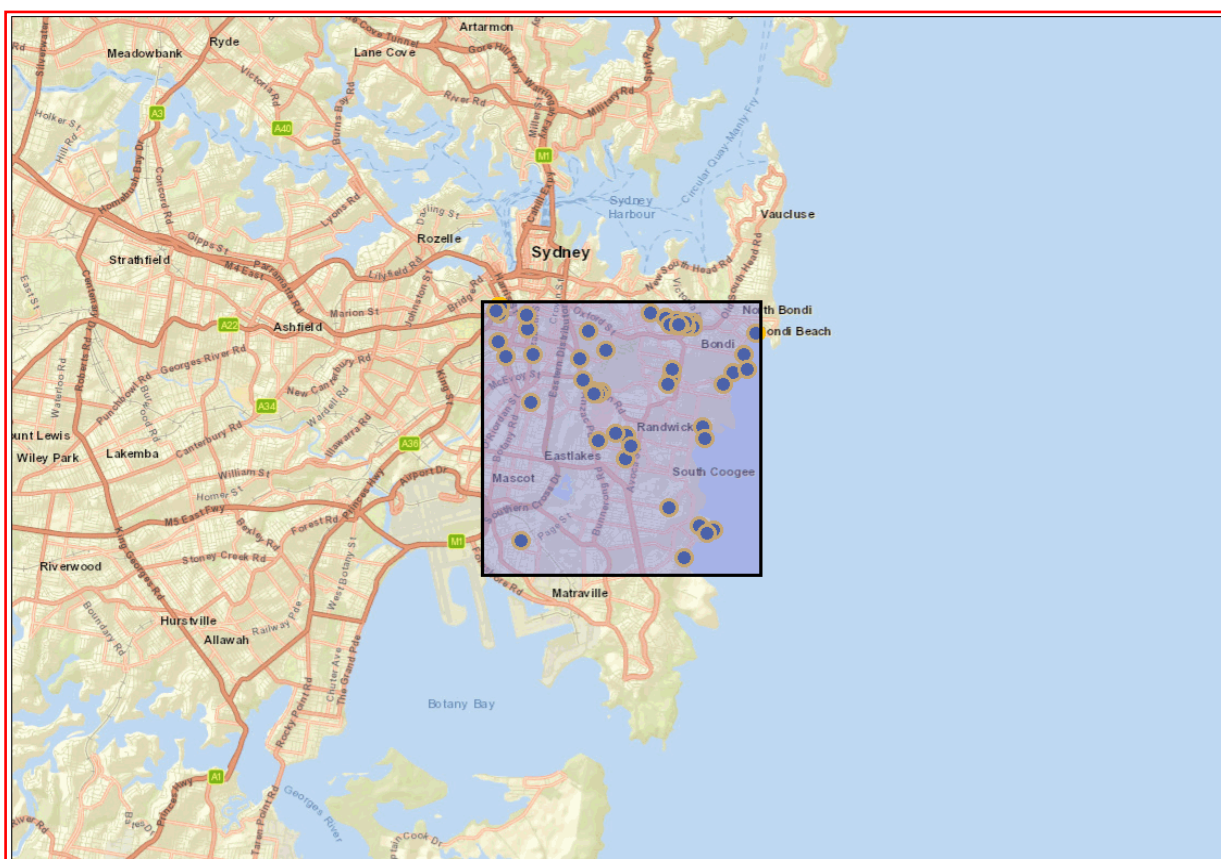
Attention: Juliet Scholefield

Email: jscholefield@urbis.com.au

Dear Sir or Madam:

**AHIMS Web Service search for the following area at Datum :GDA, Zone : 56, Eastings : 332867.4 - 340867.4, Northings : 6241568.0 - 6249568.0 with a Buffer of 0 meters, conducted by Juliet Scholefield on 26 July 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:

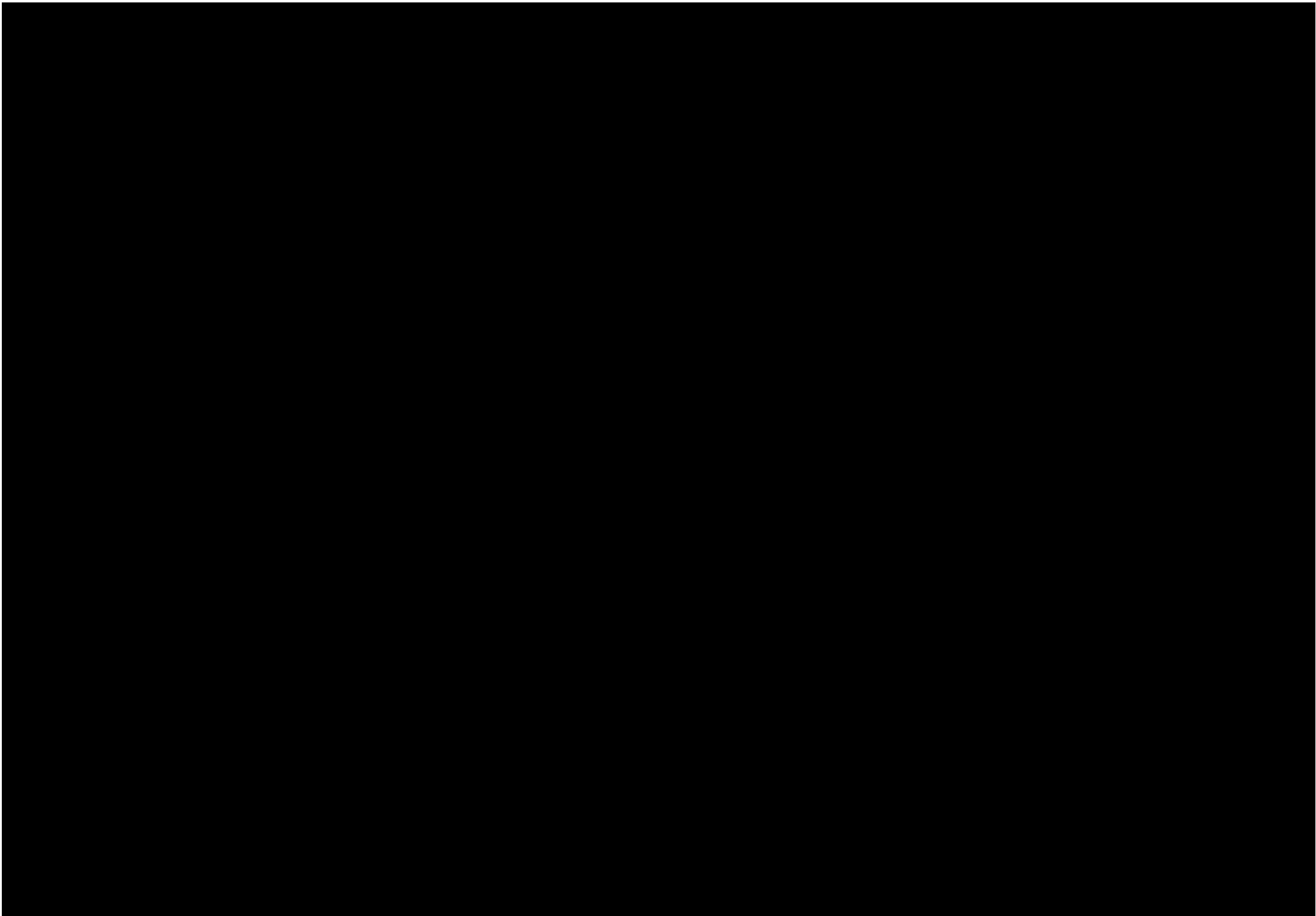
|           |  |
|-----------|--|
| <b>59</b> | <b>Aboriginal sites are recorded in or near the above location.</b>          |
| <b>0</b>  | <b>Aboriginal places have been declared in or near the above location. *</b> |

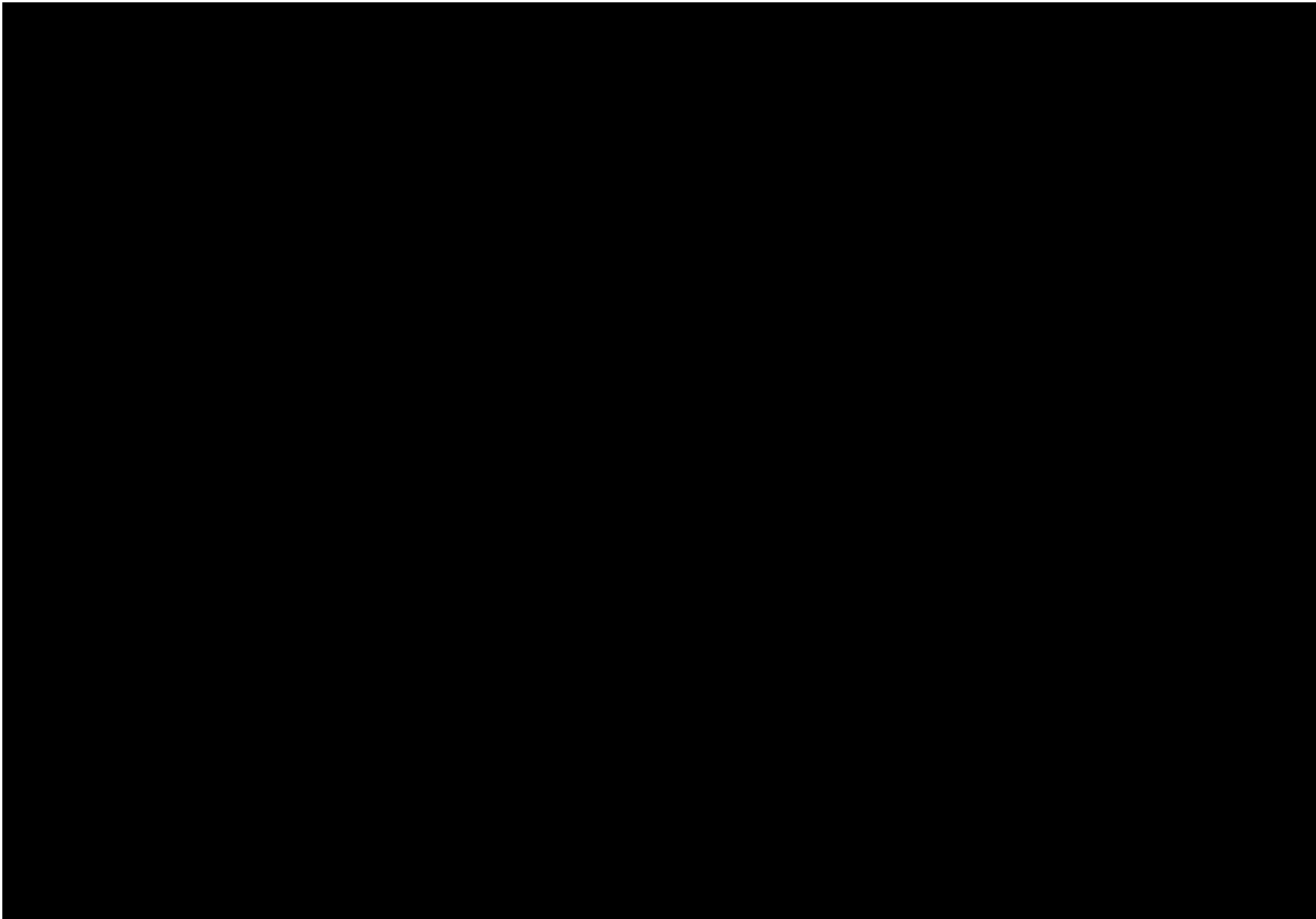
### **If your search shows Aboriginal sites or places what should you do?**

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

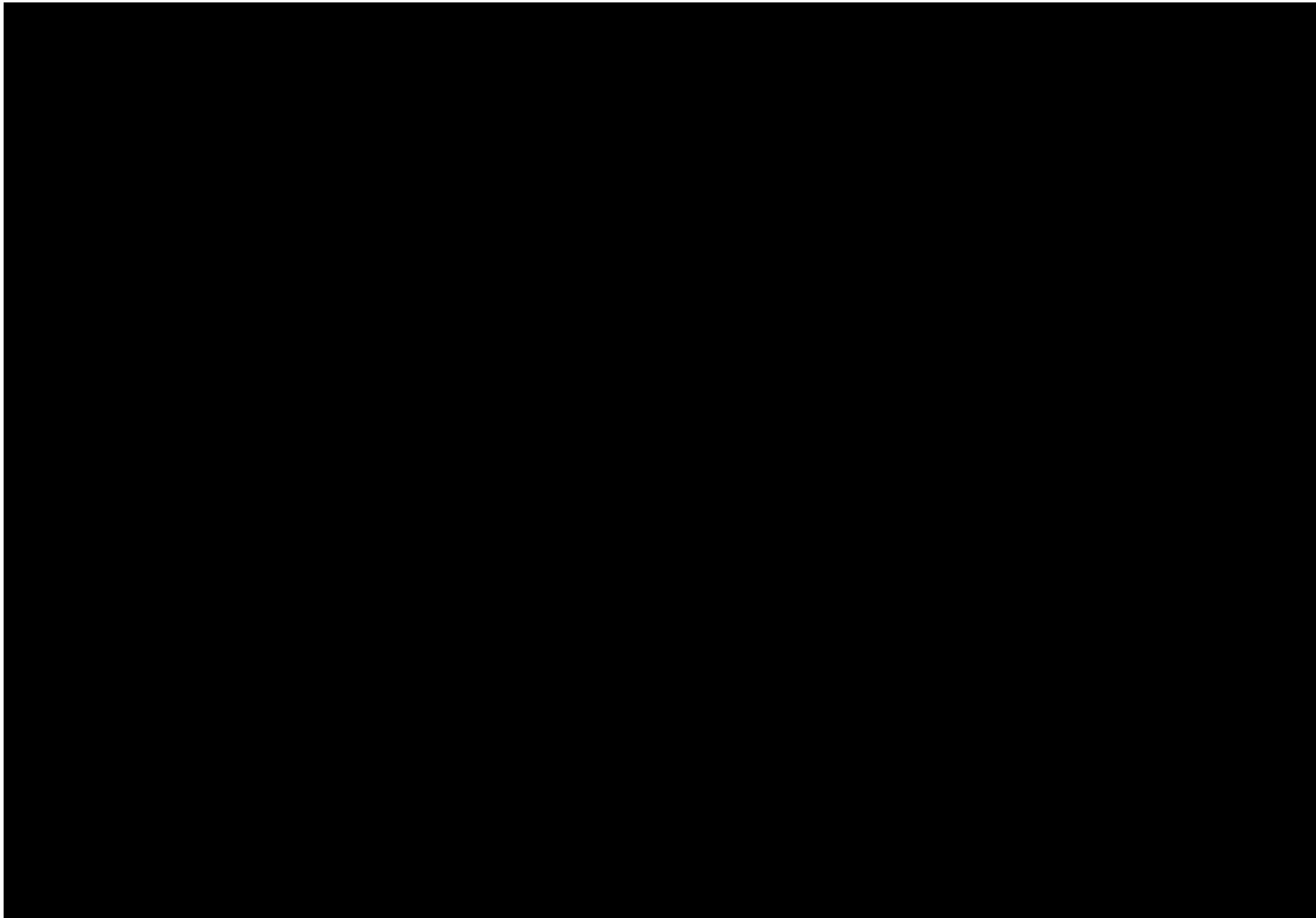
### **Important information about your AHIMS search**

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











**APPENDIX C**

**REGISTERED ABORIGINAL PARTY  
CONSULTATION LOG**



# **APPENDIX D**

# **REGISTERED ABORIGINAL PARTY CONSULTATION DOCUMENTATION**

# **APPENDIX D**

# **REGISTERED ABORIGINAL PARTY CONSULTATION DOCUMENTATION**

**From:** [Natalie Taylor](#)  
**To:** [Geospatial Search Requests](#)  
**Cc:** [Aaron Olsen](#)  
**Subject:** Aboriginal Cultural Heritage Assessment - Randwick - Native Title Search Request  
**Date:** Thursday, 25 July 2024 10:43:00 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[Request for Spatial Search of Tribunal Register.pdf](#)

---

Good morning,

Urbis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) in the eastern precinct of the UNSW Kensington Campus, along Library Walk and Chancellery Walk, Randwick, NSW.

As part of the consultation process for that ACHA, we are seeking to request a spatial search of the National Native Title Tribunal Register. We request that you please provide the results of the search by return email at your earliest convenience.

For further details please refer to the attached form. We look forward to hearing from you.

Kind regards,  
Natalie

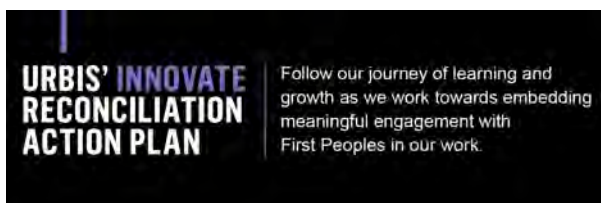
**NATALIE TAYLOR** *she/her/hers*  
ARCHAEOLOGY ASSISTANT

**D** +61 2 8233 9964

**E** [ntaylor@urbis.com.au](mailto:ntaylor@urbis.com.au)

*My working days are Tuesday, Thursday and Friday.*

ANGEL PLACE, LEVEL 8, 123 PITT STREET  
SYDNEY, NSW 2000, AUSTRALIA  
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](#).

This email and any files transmitted are for the intended recipient's use only. It contains information which may be confidential and/or protected by copyright. Any personal information in this email must be handled in accordance with the Privacy Act 1988 (Cth). If you have received this email by mistake, please notify the sender and permanently delete the email. Any confidentiality or copyright is not waived or lost because this email has been sent to you by mistake.



## Request for Spatial Search of Tribunal Registers

### 1: Your details

|                                     |   |             |                        |
|-------------------------------------|---|-------------|------------------------|
| Your name:                          | <i>Natalie Taylor</i>   |             |                        |
| Your company:                       | <i>Urbis Ltd</i>  |             |                        |
| E-mail address:                     | <i>ntaylor@urbis.com.au</i>   | Phone:      | <i>+61 2 8233 9964</i> |
| Your reference:                     | <i>P0054776</i>   | Your state: | <i>New South Wales</i> |
| <input checked="" type="checkbox"/> | <i>I have read and acknowledge the terms and conditions on the next page.</i> |             |                        |

### 2: Areas to be searched

|                              |                        |                        |                            |
|------------------------------|------------------------|------------------------|----------------------------|
| Jurisdiction to be searched: | <i>New South Wales</i> | Tenure to be searched: | <i>Non freehold parcel</i> |
|------------------------------|------------------------|------------------------|----------------------------|

Parcel or tenement identifiers (add up to 20 separate identifiers). **Please see over for parcel identifiers.**

|            |   |            |   |
|------------|---|------------|---|
| Parcel 1:  | <i>Click or tap here to enter text.</i> | Parcel 2:  | <i>Click or tap here to enter text.</i> |
| Parcel 3:  | <i>Click or tap here to enter text.</i> | Parcel 4:  | <i>Click or tap here to enter text.</i> |
| Parcel 5:  | <i>Click or tap here to enter text.</i> | Parcel 6:  | <i>Click or tap here to enter text.</i> |
| Parcel 7:  | <i>Click or tap here to enter text.</i> | Parcel 8:  | <i>Click or tap here to enter text.</i> |
| Parcel 9:  | <i>Click or tap here to enter text.</i> | Parcel 10: | <i>Click or tap here to enter text.</i> |
| Parcel 11: | <i>Click or tap here to enter text.</i> | Parcel 12: | <i>Click or tap here to enter text.</i> |
| Parcel 13: | <i>Click or tap here to enter text.</i> | Parcel 14: | <i>Click or tap here to enter text.</i> |
| Parcel 15: | <i>Click or tap here to enter text.</i> | Parcel 16: | <i>Click or tap here to enter text.</i> |
| Parcel 17: | <i>Click or tap here to enter text.</i> | Parcel 18: | <i>Click or tap here to enter text.</i> |
| Parcel 19: | <i>Click or tap here to enter text.</i> | Parcel 20: | <i>Click or tap here to enter text.</i> |

If your search area is not a parcel or mining or petroleum tenement, you can enter other tenure or administrative regions here (e.g. local government area, townsite or county). Please provide as much detail as you can.

The site is located at located in the eastern precinct of Kensington Campus, along Library Walk and Chancellery Walk, Randwick, NSW. It is legally described as part of Lot 5 DP 1264171. The site is bordered by Library Walk to the north, a carpark and then Oval Lane to the south, Chancellery Walk to the west and further buildings relating to the university to the east.  
LGA: Randwick City Council  
La Perouse LALC

E-mail the completed form to [GeospatialSearch@NNTT.gov.au](mailto:GeospatialSearch@NNTT.gov.au)



**Search Register of Native Title Claims**

**Search National Native Title Register**

**Search Register of Indigenous Land Use Agreements**

**Search Records of Section 31 Agreements**

**Search Applications and Determinations**

**Search Future Act Applications and Determinations**

**Search Register of Native Title Claims**

The Register of Native Title Claims (RNTC) contains information about all claimant applications that have been registered. The Registrar is responsible for maintaining the RNTC.

Further information about the RNTC is available.

Tribunal file no:

Federal Court file no:

Application name:

State or Territory:

Representative A/TSI body area:

Local government area:

Date filed between:  and

Sort by:

No results for current search criteria

**Search Register of Native Title Claims**

**Search National Native Title Register**

**Search Register of Indigenous Land Use Agreements**

**Search Records of Section 31 Agreements**

**Search Applications and Determinations**

**Search Future Act Applications and Determinations**

- [Search Register of Native Title Claims](#)
- [Search National Native Title Register](#)
- [Search Register of Indigenous Land Use Agreements](#)
- [Search Records of Section 31 Agreements](#)
- [Search Applications and Determinations](#)
- [Search Future Act Applications and Determinations](#)

**Search National Native Title Register**

The National Native Title Register (NNTR) is a register established under s. 192 of the N

The NNTR contains determinations of native title made by:

- the High Court of Australia
- the Federal Court of Australia
- or a recognised body such as South Australia's Supreme Court and Environment Resources and Development Court.

Further information about the NNTR is available.

Tribunal file no:

Federal Court file no:

Short name:

Case name:

State or Territory:

Registered Native Title Body Corporate\*:

Representative A/TSI body area:

Local government area:

Determination type:

Legal process:

Determination outcome:

Determination date between:  and

Sort by:

\*Please note: current contact details for the Registered Native Title Body Corporate are available from the Office of the Registrar of Indigenous Corporations [www.oric.gov.au](http://www.oric.gov.au)

Your search returned **1** matches.

| Short name                               | Case name  | Legal process | Determination date | Outcome                     |
|--|--|---------------|--------------------|-----------------------------|
| La Perouse Local Aboriginal Land Council | La Perouse Local Aboriginal Land Council v Attorney General of New South Wales | Unopposed     | 11/07/2019         | Native title does not exist |

Search Register of Native Title Claims

Search National Native Title Register

Search Register of Indigenous Land Use Agreements

Search Records of Section 31 Agreements

Search Applications and Determinations

Search Future Act Applications and Determinations

### Search Native Title Applications, Registration Decisions and Determinations

You can browse or search summary information about all native title applications, registration testing and native title determinations using this search form.

|                                |   |
|--------------------------------|---|
| <b>Search</b>                  | Native Title Applications                     |
| Tribunal file no.              | <input type="text"/>                          |
| Federal Court file no.         | <input type="text"/>                          |
| Application name               | <input type="text"/>                          |
| Application type               | ALL   |
| State or Territory             | New South Wales                               |
| Local government area          | Randwick City Council                         |
| Representative A/TSI body area | ALL   |
| Applicant representative       | <input type="text"/>                          |
| Application status             | ALL   |
| Notification status            | ALL   |
| Date filed between             | <input type="text"/> and <input type="text"/> |
| Sort by                        | Date filed                                    |
| <b>Search</b> >                |   |

Your search returned **6** matches.

| Name  | NNTT file no | Federal Court file no | Date filed | Application status |
|---|--------------|-----------------------|------------|--------------------|
| Southern Metropolitan Cemeteries Land Manager and Attorney General of New South Wales | NN2020/003   | NSD189/2020           | 25/02/2020 | Discontinued       |
| La Perouse Local Aboriginal Land Council  | NN2018/003   | NSD996/2018           | 12/06/2018 | Determined         |
| Eora People   | NC1998/010   | NSD6099/1998          | 01/05/1998 | Dismissed          |
| Dharawal Nation   | NC1997/016   | NSD6068/1998          | 03/07/1997 | Discontinued       |
| Darug Tribal Aboriginal Corporation   | NC1997/008   | NSD6061/1998          | 12/05/1997 | Discontinued       |
| Korewal   | NC1996/010   | NSD6029/1998          | 27/03/1996 | Dismissed          |

## Parcel Identifiers

In most jurisdictions please identify parcels using lot on plan, or lot/section/plan as appropriate. The NNTT is generally not able to identify parcels using land title information. Where possible, the NNTT uses the terminology and formatting of unique identifiers used in each state to uniquely identify a land parcel. More details are below:

1. **Lot on plan.** Use for Western Australia and Queensland.
2. **Lot/Section/Plan.** Use for New South Wales.
3. **LAISKEY.** Use for the Northern Territory. The laiskey is a unique identifier for each parcel comprised of the location code, LTO code (derived from the survey plan) where applicable and the parcel number.
4. **Parcel ID** – Use for South Australia. Concatenation of Parcel Type, Parcel, Plan Type and Plan.
5. **SPI (Standard Parcel Identifier)** – Use for Victoria.

## Terms and Conditions

1. Specify only one jurisdiction (e.g. Queensland) and one type of tenure (e.g. mining tenement) per form. You can add up to 20 separate tenements or parcels per search request. For more than 20 parcels or tenements please submit additional search requests or contact [GeospatialSearch@NNTT.gov.au](mailto:GeospatialSearch@NNTT.gov.au) to discuss your requirements.

Note: if your area of interest cannot be clearly identified from the search form, or is not held in NNTT datasets, we may instead provide search results for a surrounding local government area, or other suitable regional area.

2. Freehold land.

Under the Native Title Act 1993 (Cth), the valid grant of a freehold estate (other than certain types of Aboriginal and Torres Strait Islander land) on or before 23 December 1996 is known as a 'previous exclusive possession act'. This means that native title has been extinguished over the area. Native title claimants are not allowed to include land and waters covered by previous exclusive possession acts in their applications; therefore they would normally exclude freehold areas. A native title application may, however, be made over freehold land on the basis that freehold was invalidly granted, but the chances of this happening are very low.

3. Cultural Heritage in NSW.

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

4. Spatial searches rely on data obtained from the relevant custodian. Whilst efforts are taken to update such datasets on a regular basis, the collection and interpretation of such datasets may be influenced by a number of factors that can impact of the completeness and accuracy of your search results.

## Disclaimer

While the National Native Title Tribunal (NNTT) and the Native Title Registrar (Registrar) have exercised due care in ensuring the accuracy of the information provided, it is provided for general information only and on the understanding that neither the NNTT, the Registrar nor the Commonwealth of Australia is providing professional advice. Appropriate professional advice relevant to your circumstances should be sought rather than relying on the information provided. In addition, you must exercise your own judgment and carefully evaluate the information provided for accuracy, currency, completeness and relevance for the purpose for which it is to be used.

The information provided is often supplied by, or based on, data and information from external sources, therefore the NNTT and Registrar cannot guarantee that the information is accurate or up-to-date.

The NNTT and Registrar expressly disclaim any liability arising from the use of this information.

This information should not be relied upon in relation to any matters associated with cultural heritage.

**From:** [Natalie Taylor](#)  
**To:** [council@randwick.nsw.gov.au](mailto:council@randwick.nsw.gov.au); [aboriginalowners@oralra.nsw.gov.au](mailto:aboriginalowners@oralra.nsw.gov.au); [Enquiries: information@ntscorp.com.au](#); [gs.service@ils.nsw.gov.au](mailto:gs.service@ils.nsw.gov.au); [OEH HD Heritage Mailbox](#); [La Perouse Admin](#)  
**Cc:** [Aaron Olsen](#)  
**Subject:** UNSW G25 Project – Aboriginal Cultural Heritage Assessment – Consultation Stage 1.2 (Our Ref: P0054776)  
**Date:** Friday, 19 July 2024 4:14:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[P0054776\\_UNSWG25\\_1.2\\_Agency\\_Notice\\_Letter.pdf](#)

---

Good afternoon,

Urbis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed site of the new G25 Building located in the eastern precinct of the UNSW Kensington Campus, along Library Walk and Chancellery Walk, Randwick, NSW.

The subject area is located within the Randwick City Council Local Government Area and the La Perouse Local Aboriginal Land Council.

As part of the consultation process for the ACHA, we are seeking to compile a list of Aboriginal parties 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).

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 **2 August 2024**.

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

Kind regards,

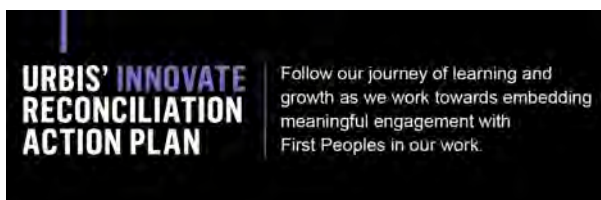
**NATALIE TAYLOR** *she/her/hers*  
ARCHAEOLOGY ASSISTANT

**D** +61 2 8233 9964

**E** [ntaylor@urbis.com.au](mailto:ntaylor@urbis.com.au)

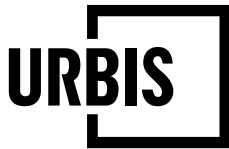
*My working days are Tuesday, Thursday and Friday.*

ANGEL PLACE, LEVEL 8, 123 PITT STREET  
SYDNEY, NSW 2000, AUSTRALIA  
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](#).

This email and any files transmitted are for the intended recipient's use only. It contains information which may be confidential and/or protected by copyright. Any personal information in this email must be handled in accordance with the Privacy Act 1988 (Cth). If you have received this email by mistake, please notify the sender and permanently delete the email. Any confidentiality or copyright is not waived or lost because this email has been sent to you by mistake.



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

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

19 July 2024

To whom it may concern,

## **UNSW G25 PROJECT – ABORIGINAL CULTURAL HERITAGE ASSESSMENT – REQUEST FOR INFORMATION**

Urbis has been commissioned by UNSW ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of the proposed site of the new G25 Building located in the eastern precinct of Kensington Campus, along Library Walk and Chancellery Walk, legally described as part of Lot 5 DP 1264171 ('the subject area').

The subject area is located in the City of Randwick Local Government Area and within the administrative boundaries of the La Perouse Local Aboriginal Land Council.

The ACHA is being prepared to support a State Significant Development Application (SSDA) which will seek approval for the G25 building to meet the future needs of the university.

The Proponent can be contacted via:

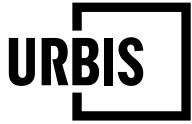
Siobhan Hargroves  
Development Manager  
Estate Management  
L3, Matthews Building  
UNSW  
Sydney NSW 2052  
0402 338 253  
Siobhan.Hargroves@unsw.edu.au

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 may also be used to support an Aboriginal Heritage Impact Permit (AHIP) if necessary.

Urbis therefore seeks to compile a list of Aboriginal parties who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area.

If you are aware of any Aboriginal parties who may hold relevant cultural knowledge, we request that you please provide their details at your earliest convenience and preferably by **2 August 2024** in writing to:

Natalie Taylor  
Archaeology Assistant



Urbis  
Level 8, 123 Pitt Street  
Sydney, NSW, 2000  
E: [ntaylor@urbis.com.au](mailto:ntaylor@urbis.com.au)

The proponent will write to each Aboriginal person or group whose details are provided to notify them of the proposed project and invite them to register an interest in the community consultation process.

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 be "A. Olsen", with a long horizontal stroke extending to the right.

Aaron Olsen  
Senior Consultant  
+61 2 8233 9957  
[aolsen@urbis.com.au](mailto:aolsen@urbis.com.au)

**From:** [Aboriginal Owners](#)  
**To:** [Natalie Taylor](#)  
**Cc:** [Aaron Olsen](#)  
**Subject:** RE: UNSW G25 Project – Aboriginal Cultural Heritage Assessment – Consultation Stage 1.2 (Our Ref: P0054776)  
**Date:** Monday, 22 July 2024 1:03:41 PM  
**Attachments:** [image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[20240722\\_AO\\_Search\\_ACHA\\_Randwick\\_UNSW\\_Urbis\\_Pty\\_Ltd.pdf](#)

---

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

OFFICIAL

Dear Natalie,

Please find attached the response from the Office of the Registrar, ALRA to your letter of 19 July 2024 regarding the proposed site of the new G25 Building located in the eastern precinct of Kensington Campus, Randwick, NSW.

If you have any further questions, please respond by return email.

Kind Regards

### **The Aboriginal Owners team**

Office of the Registrar, Aboriginal Land Rights Act 1983  
**T** (02) 8575 1160 **E** [aboriginalowners@oralra.nsw.gov.au](mailto:aboriginalowners@oralra.nsw.gov.au)  
[www.oralra.nsw.gov.au](http://www.oralra.nsw.gov.au)

PO Box 787  
PARRAMATTA NSW 2124

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



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.

---

OFFICIAL

**From:** Natalie Taylor <[ntaylor@urbis.com.au](mailto:ntaylor@urbis.com.au)>  
**Sent:** Friday, July 19, 2024 4:14 PM  
**To:** [council\\_randwick\(contact\) <council@randwick.nsw.gov.au>](mailto:council_randwick(contact)@council@randwick.nsw.gov.au); [Aboriginal Owners <aboriginalowners@oralra.nsw.gov.au>](mailto:aboriginalowners@oralra.nsw.gov.au); [Enquiries <enquiries@nntt.gov.au>](mailto:enquiries@nntt.gov.au);

information@ntscorp.com.au; gs.service@lls.nsw.gov.au; OEH HD Heritage Mailbox  
<heritagemailbox@environment.nsw.gov.au>; La Perouse Admin  
<Admin@laperouse.org.au>

**Cc:** Aaron Olsen <aolsen@urbis.com.au>

**Subject:** UNSW G25 Project – Aboriginal Cultural Heritage Assessment – Consultation  
Stage 1.2 (Our Ref: P0054776)

[CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.]

Good afternoon,

Urbis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed site of the new G25 Building located in the eastern precinct of the UNSW Kensington Campus, along Library Walk and Chancellery Walk, Randwick, NSW.

The subject area is located within the Randwick City Council Local Government Area and the La Perouse Local Aboriginal Land Council.

As part of the consultation process for the ACHA, we are seeking to compile a list of Aboriginal parties 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).

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 **2 August 2024**.

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

Kind regards,

**NATALIE TAYLOR** *she/her/hers*  
ARCHAEOLOGY ASSISTANT

D +61 2 8233 9964

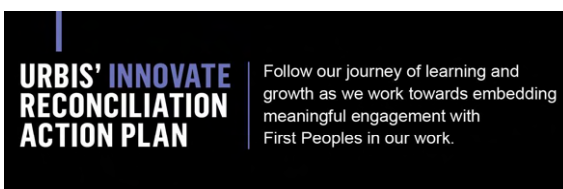
E [ntaylor@urbis.com.au](mailto:ntaylor@urbis.com.au)

*My working days are Tuesday, Thursday and Friday.*

**SHAPING  
CITIES AND  
COMMUNITIES**



ANGEL PLACE, LEVEL 8, 123 PITT STREET  
SYDNEY, NSW 2000, AUSTRALIA  
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](#).

ANGEL PLACE, LEVEL 8, [123 PITT STREET](#)  
[SYDNEY, NSW 2000, AUSTRALIA](#)  
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](#).

This email and any files transmitted are for the intended recipient's use only. It contains information which may be confidential and/or protected by copyright. Any personal information in this email must be handled in accordance with the Privacy Act 1988 (Cth). If you have received this email by mistake, please notify the sender and permanently delete the email. Any confidentiality or copyright is not waived or lost because this email has been sent to you by mistake.

**From:** [Barry Gunther](#)  
**To:** [Natalie Taylor](#)  
**Subject:** Heritage NSW Aboriginal stakeholder list for UNSW Kensington Campus, along Library Walk and Chancellery Walk.  
**Date:** Tuesday, 23 July 2024 10:53:21 AM  
**Attachments:** [Heritage NSW Aboriginal stakeholder list for Randwick LGA.docx](#)  
[P0054776\\_UNSWG25\\_1.2\\_Agency Notice Letter.pdf](#)

---

You don't often get email from [barry.gunther@environment.nsw.gov.au](mailto:barry.gunther@environment.nsw.gov.au). [Learn why this is important](#)

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

Hi Natalie,

Please find attached the Heritage NSW Aboriginal stakeholder list for UNSW Kensington Campus, along Library Walk and Chancellery Walk.

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](http://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

**LIST OF ABORIGINAL STAKEHOLDERS FOR THE DEPARTMENT OF PLANNING AND ENVIRONMENT (DPE) HELD BY DPE FOR THE PURPOSES OF THE OEH  
ABORIGINAL CULTURAL HERITAGE CONSULTATION REQUIREMENTS FOR PROPONENTS 2010**

The purpose of this letter is to assist you as the proposed applicant in undertaking Aboriginal community consultation in accordance with the relevant legislation and guidelines.

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

In accordance with Clause 60 (10) of the National Parks and Wildlife Regulation 2019, where an agreement of the kind listed below specifies or identifies a modified or alternative consultation process for the purposes of Part 6 of the National Parks and Wildlife Act 1974, the applicant is to undertake consultation in accordance with the modified or alternative process. The applicable agreements are:

- a) a registered Indigenous Land Use Agreement under the Native Title Act 1993 of the Commonwealth entered into between an Aboriginal community and the State,
- b) a lease entered into under Part 4A of the Act,
- c) an agreement entered into by the Secretary and a board of management reserved under Part 4A of the Act that has the consent of Aboriginal owner board members for the land concerned,
- d) an agreement entered into between an Aboriginal community and the Department of Planning, Industry and the Environment.

Where you believe your application is wholly or partially located within an area subject to any of the above agreements, please provide further correspondence (including mapping, if required) detailing the applicable agreement and its relationship to the application area to [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au). Heritage NSW will respond with further advice.

Where the above does not apply, please proceed with consultation in accordance with the Clause 60 (1-9) of the National Parks and Wildlife Regulation 2019 and Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (the "Consultation Requirements"). A copy of the Consultation Requirements can be found on the OEH website at: <http://www.environment.nsw.gov.au/resources/cultureheritage/commconsultation/09781ACHconsultreq.pdf>.

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

The Consultation Requirements also state that:

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

- continue to maintain a deep respect for their ancestral belief system, traditional lore and custom

- recognise their responsibilities and obligations to protect and conserve their culture and heritage and care for their traditional lands or Country
- have the trust of their community, knowledge and understanding of their culture, and permission to speak about it.

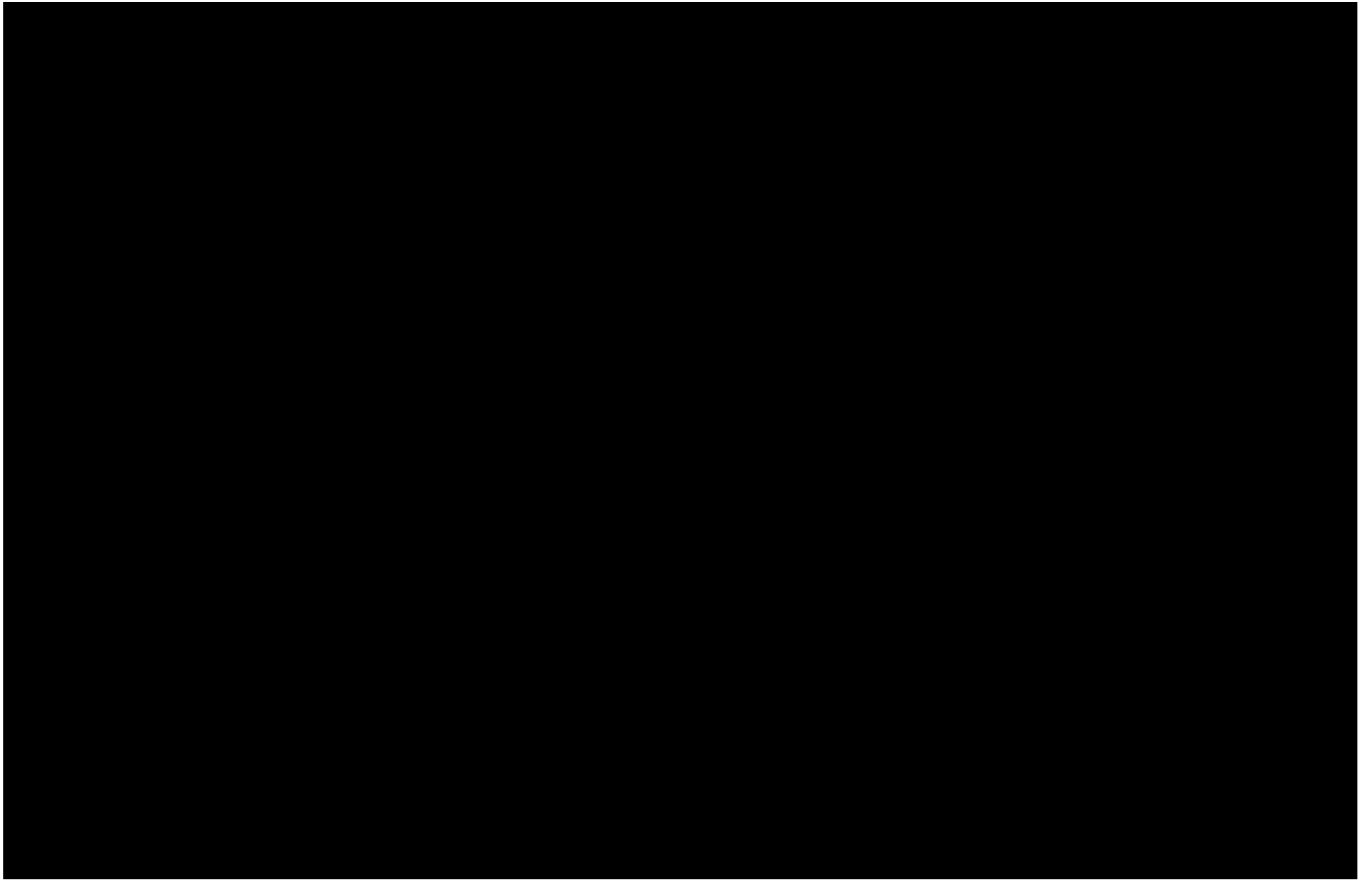
This list is provided to proponents in accordance with Clause 60(2)(a)(i) of the National Parks and Wildlife Regulation 2019 and section 4.1.2 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.

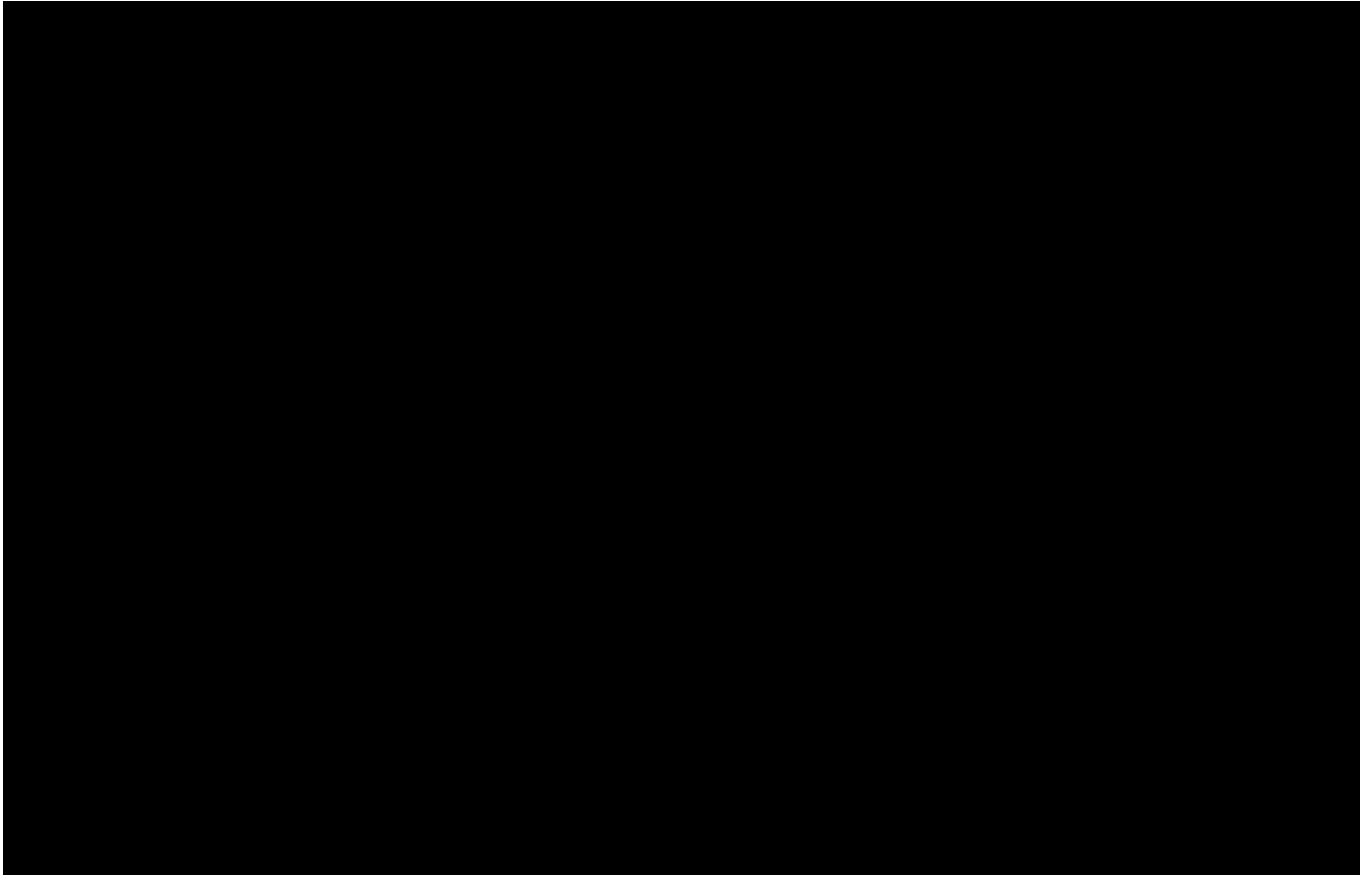
The stakeholders identified on this list may have an interest in the proposed project area and may hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places.

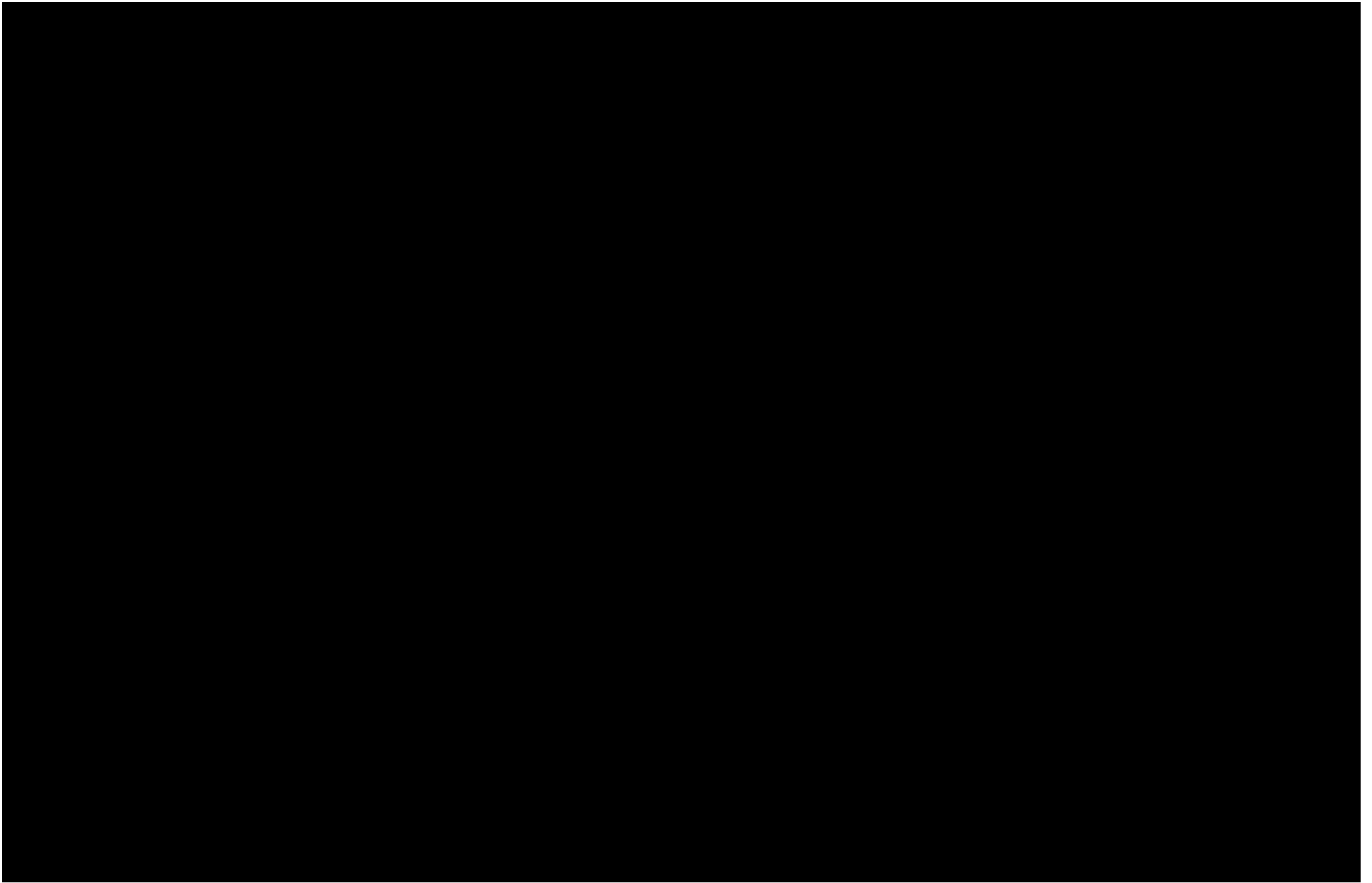
#### **How to use this list**

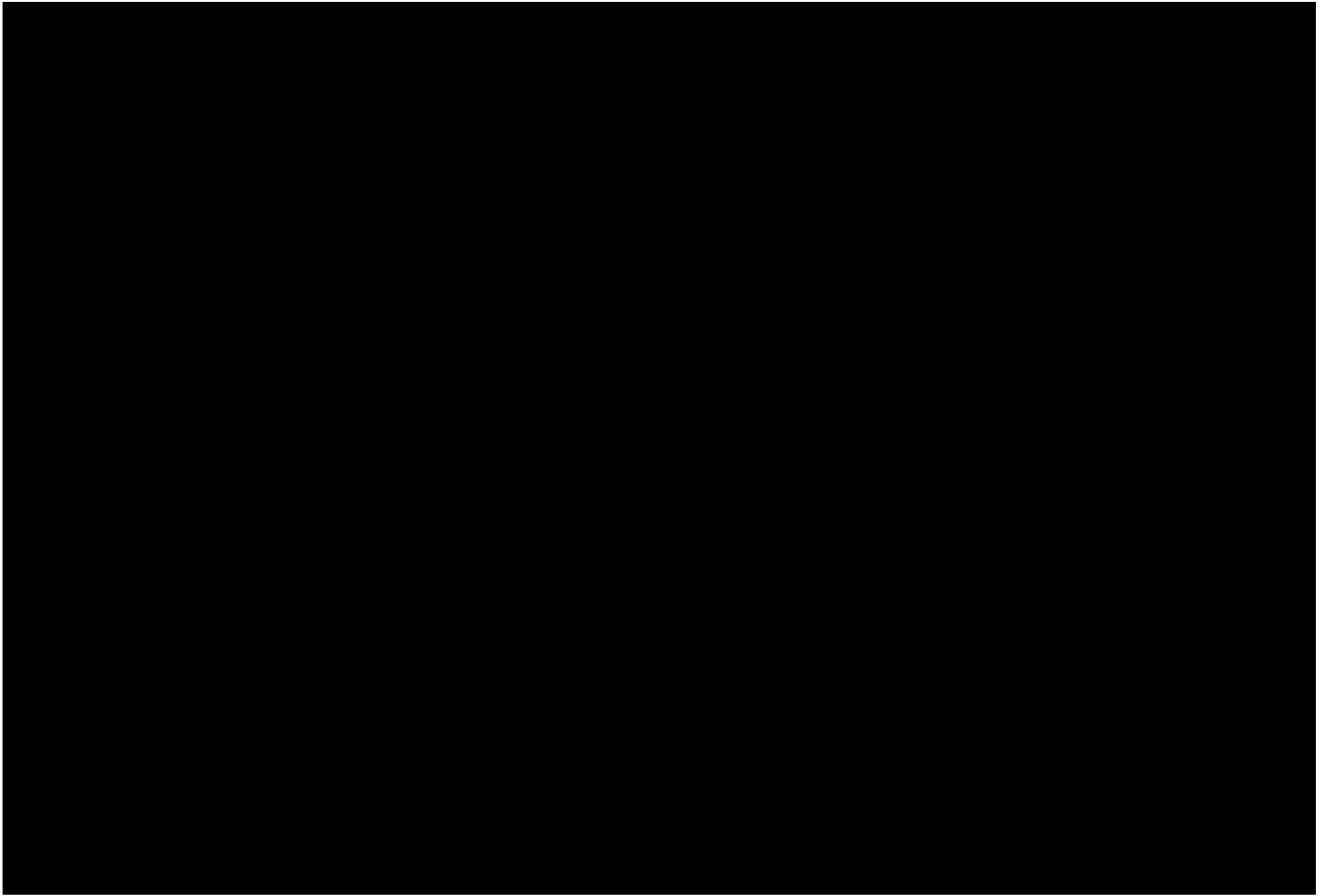
- Contact the organisations/individuals who have indicated an interest in the relevant LGA/s and invite them to register an interest in your project.
- Do not reproduce the attached list in publicly available reports and other documents. Your report should only contain the names of the organisations and individuals who you have invited to register an interest in your project and those who have registered as stakeholders for your project.
- Note that the provision of this Aboriginal stakeholder list does not override a proponent's requirement to also advertise in the local newspaper and to seek from other sources the names of any other Aboriginal people who may hold cultural knowledge as required under clause 60 (2) of the National Parks and Wildlife Regulation 2019.
- Please refer to Clause 60 of the National Parks and Wildlife Regulation 2019 and the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 for further information on the requirements of the consultation process.
- If contact details of stakeholders are found to be incorrect or outdated, please contact [heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au).

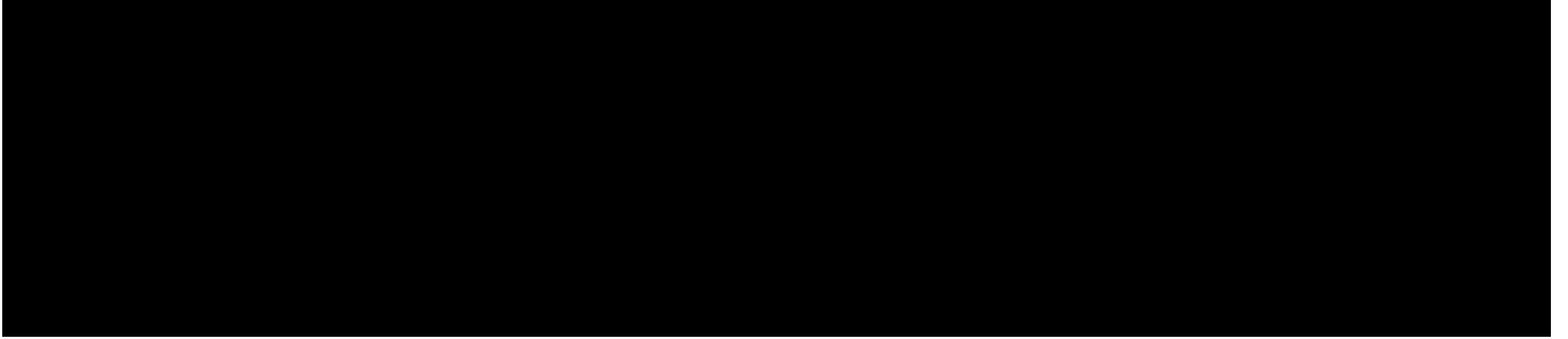
***Last updated July 2024***











**From:** [LLS GS Service Mailbox](#)  
**To:** [Natalie Taylor](#)  
**Subject:** RE: UNSW G25 Project – Aboriginal Cultural Heritage Assessment – Consultation Stage 1.2 (Our Ref: P0054776)  
**Date:** Monday, 22 July 2024 11:11:14 AM  
**Attachments:** [image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)  
[image014.png](#)  
[image015.png](#)  
[image016.png](#)  
[image017.png](#)

---

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

Dear Natalie,

Thank you for your recent letter seeking assistance to identify Aboriginal stakeholder organisations and persons who may hold an interest in Country at the project area designated in your correspondence.

Greater Sydney Local Land Services (GS LLS) acknowledges that Local Land Services (formerly as Catchment Management Authorities) has been listed in Section 4.1.3.(g) of the Aboriginal Cultural Heritage Consultation requirements for proponents 2010, to support Part 6, of the NSW National Parks and Wildlife Act 1974 as a source of information to obtain the 'names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places'.

GS LLS understands and respects the significant role and values that tangible and intangible Aboriginal Cultural Heritage holds for First Nations/Aboriginal people with Country. GS LLS also partners with many First Nations communities on Caring for Country projects that aim to protect and enhance those tangible and intangible values in Country including Aboriginal Cultural Heritage. GS LLS considers Aboriginal Cultural Heritage matters in relation to its role in land management and considers cultural heritage issues in the context of Natural Resource Management.

However, GS LLS feels that it is not a primary source of contact for First Nations (Aboriginal) communities or persons that may inform or provide comment on development or planning issues.

GS LLS strongly recommends you contact Heritage NSW to seek their advice on all-inclusive contact lists of persons and organisations who 'speak for Country' and that may assist with your investigation.

Regards

Customer Service Team

Local Land Services | Greater Sydney  
**Department of Regional NSW**

**Telephone 02 4724 2100**

Level 4, 2-6 Station Street Penrith  
PO Box 4515 WESTFIELD PENRITH

**Office Hours:** 8.30am - 4.30pm

**E:** [gs.service@lls.nsw.gov.au](mailto:gs.service@lls.nsw.gov.au) | **W:** [www.lls.nsw.gov.au](http://www.lls.nsw.gov.au)



## Department of Regional NSW

You can also get in touch with us is through our [online enquiry form](#)

### How would you rate our service today?



Your opinion is valuable and will help us improve our service

Greater Sydney Local Land Services acknowledges we operate in and deliver services throughout Country of First Nations people in the Greater Sydney Region.

We recognise and respect Elders and cultural knowledge holders, past and present, while acknowledging the unique and diverse enduring cultures and histories of all First Nations people.

Always was and always will be Aboriginal land.

---

**From:** Natalie Taylor <ntaylor@urbis.com.au>

**Sent:** Friday, 19 July 2024 4:14 PM

**To:** OLG - Randwick City Council <council@randwick.nsw.gov.au>;  
aboriginalowners@oralra.nsw.gov.au; Enquiries <enquiries@nntt.gov.au>;  
information@ntscorp.com.au; LLS GS Service Mailbox <gs.service@lls.nsw.gov.au>; OEH HD  
Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>; La Perouse Admin  
<Admin@laperouse.org.au>

**Cc:** Aaron Olsen <aolsen@urbis.com.au>

**Subject:** UNSW G25 Project – Aboriginal Cultural Heritage Assessment – Consultation Stage 1.2  
(Our Ref: P0054776)

Good afternoon,

Urbis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed site of the new G25 Building located in the eastern precinct of the UNSW Kensington Campus, along Library Walk and Chancellery Walk, Randwick, NSW.

The subject area is located within the Randwick City Council Local Government Area and the La Perouse Local Aboriginal Land Council.

As part of the consultation process for the ACHA, we are seeking to compile a list of Aboriginal parties 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).

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 **2 August 2024**.

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

Kind regards,

**NATALIE TAYLOR** *she/her/hers*  
ARCHAEOLOGY ASSISTANT

D +61 2 8233 9964

E [ntaylor@urbis.com.au](mailto:ntaylor@urbis.com.au)

*My working days are Tuesday, Thursday and Friday.*

**SHAPING  
CITIES AND  
COMMUNITIES**



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

**URBIS' INNOVATE  
RECONCILIATION  
ACTION PLAN**

Follow our journey of learning and growth as we work towards embedding meaningful engagement with First Peoples in our work.

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

This email and any files transmitted are for the intended recipient's use only. It contains information which may be confidential and/or protected by copyright. Any personal information in this email must be handled in accordance with the Privacy Act 1988 (Cth). If you have received this email by mistake, please notify the sender and permanently delete the email. Any confidentiality or copyright is not waived or lost because this email has been sent to you by mistake.

**From:** [Enquiries](#)  
**To:** [Natalie Taylor](#)  
**Subject:** RE: UNSW G25 Project – Aboriginal Cultural Heritage Assessment – Consultation Stage 1.2 (Our Ref: P0054776) [SEC=OFFICIAL]  
**Date:** Friday, 19 July 2024 4:16:20 PM  
**Attachments:** [image007.png](#)  
[image008.png](#)  
[image009.png](#)  
[image010.png](#)  
[image011.png](#)  
[image012.png](#)  
[image013.png](#)

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

**OFFICIAL**

Good afternoon,

Thank you for your enquiry regarding Register Searches. To enable us to complete the search appropriately and adequately, please forward your request, along with a Geospatial Search Form, to the following email address: [GeospatialSearch@NNTT.gov.au](mailto:GeospatialSearch@NNTT.gov.au)

**A Geospatial Search Form must accompany your request.** Search request forms are available for download from our website

at: [http://www.nntt.gov.au/assistance/Geospatial/Pages/Geospatial\\_Searches.aspx](http://www.nntt.gov.au/assistance/Geospatial/Pages/Geospatial_Searches.aspx)

Further information on searching our Registers is available

at: <http://www.nntt.gov.au/assistance/Pages/Searches-and-providing-Register-information.aspx>

***Please note:***

**Cultural Heritage** - The existence or otherwise of native title is quite separate to any matters relating to Aboriginal cultural heritage. In NSW, the National Native Title Tribunal has undertaken steps to remove itself from the formal list of sources for information about indigenous groups in development areas.

Kind regards,

**Olivia**

**National Native Title Tribunal | Brisbane**

Level 5, Harry Gibbs Commonwealth Law Courts, 119 North Quay, Brisbane QLD 4000

p. (07) 3052 4040 | em. [enquiries@nntt.gov.au](mailto:enquiries@nntt.gov.au)

[www.nntt.gov.au](http://www.nntt.gov.au)



**National  
Native Title  
Tribunal**

*I acknowledge the traditional custodians of the lands where we live, learn and work.*

*A Reconciled Future*

---

**From:** Natalie Taylor <[ntaylor@urbis.com.au](mailto:ntaylor@urbis.com.au)>

**Sent:** Friday, July 19, 2024 4:14 PM

**To:** [council@randwick.nsw.gov.au](mailto:council@randwick.nsw.gov.au); [aboriginalowners@oralra.nsw.gov.au](mailto:aboriginalowners@oralra.nsw.gov.au); Enquiries <[Enquiries@nntt.gov.au](mailto:Enquiries@nntt.gov.au)>; [information@ntscorp.com.au](mailto:information@ntscorp.com.au); [gs.service@lls.nsw.gov.au](mailto:gs.service@lls.nsw.gov.au); OEH HD Heritage Mailbox <[heritagemailbox@environment.nsw.gov.au](mailto:heritagemailbox@environment.nsw.gov.au)>; La Perouse Admin <[Admin@laperouse.org.au](mailto:Admin@laperouse.org.au)>

**Cc:** Aaron Olsen <[aolsen@urbis.com.au](mailto:aolsen@urbis.com.au)>

**Subject:** UNSW G25 Project – Aboriginal Cultural Heritage Assessment – Consultation Stage 1.2 (Our Ref: P0054776)

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

Good afternoon,

Urbis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed site of the new G25 Building located in the eastern precinct of the UNSW Kensington Campus, along Library Walk and Chancellery Walk, Randwick, NSW.

The subject area is located within the Randwick City Council Local Government Area and the La Perouse Local Aboriginal Land Council.

As part of the consultation process for the ACHA, we are seeking to compile a list of Aboriginal parties 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).

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 **2 August 2024**.

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

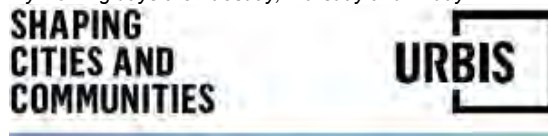
Kind regards,

**NATALIE TAYLOR** she/her/hers  
ARCHAEOLOGY ASSISTANT

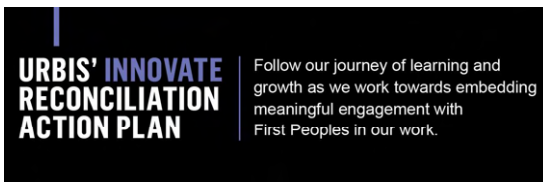
D +61 2 8233 9964

E [ntaylor@urbis.com.au](mailto:ntaylor@urbis.com.au)

*My working days are Tuesday, Thursday and Friday.*



ANGEL PLACE, LEVEL 8, 123 PITT STREET  
SYDNEY, NSW 2000, AUSTRALIA  
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](#).

This email and any files transmitted are for the intended recipient's use only. It contains information which may be confidential and/or protected by copyright. Any personal information in this email must be handled in accordance with the Privacy Act 1988 (Cth). If you have received this email by mistake, please notify the sender and permanently delete the email. Any confidentiality or copyright is not waived or lost because this email has been sent to you by mistake.

Search e.g. product, service

All categories ▾

All Locations

±50km ▾

GO

[← Back to results](#) | [All Classifieds](#) > [Notices](#) > [Public Notices](#)

## UNSW G25 PROJECT ABORIGINAL CULTURAL HERITAGE ASSESSMENT – REGISTRATION OF INTEREST



2/8/2024

Urbis has been commissioned by UNSW (the Proponent) to conduct an Aboriginal Cultural Heritage Assessment (ACHA) of the proposed site of the new G25 Building, located in the eastern precinct of Kensington Campus, along Library Walk and Chancellery Walk, legally described as part of Lot 5 DP 1264171 (the subject area).

The subject area is located in the City of Randwick Local Government Area and within the administrative boundaries of the La Perouse Local Aboriginal Land Council.

The ACHA is being prepared to support a State Significant Development Application (SSDA) which will seek approval for the G25 building to meet the future needs of the university.

The Proponent can be contacted directly via:

Siobhan Hargroves  
Development Manager  
Estate Management  
L3, Matthews Building  
UNSW  
Sydney NSW 2052  
0402 338...  
siobhan.hargroves@unsw.edu.au

The ACHA is to be carried out in accordance with the National Parks and Wildlife Regulation 2019 (NSW) and the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DEECW 2010) and will include consultation with the Aboriginal community.

Urbis is seeking interest from Aboriginal parties who hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area who wish to be included as a Registered Aboriginal Party (RAP) for the ACHA.

Please register your interest in writing to the contact details provided below by **16 August 2024**.

Natalie Taylor  
Archaeology Assistant  
Urbis  
Level 8, 123 Pitt Street  
Sydney, NSW, 2000  
E: ntaylor@urbis.com.au

Please be advised that the Proponent is required to forward the names of all RAPs to the La Perouse Local Aboriginal Land Council and Heritage NSW unless instructed to withhold that information.

Kensington 2033



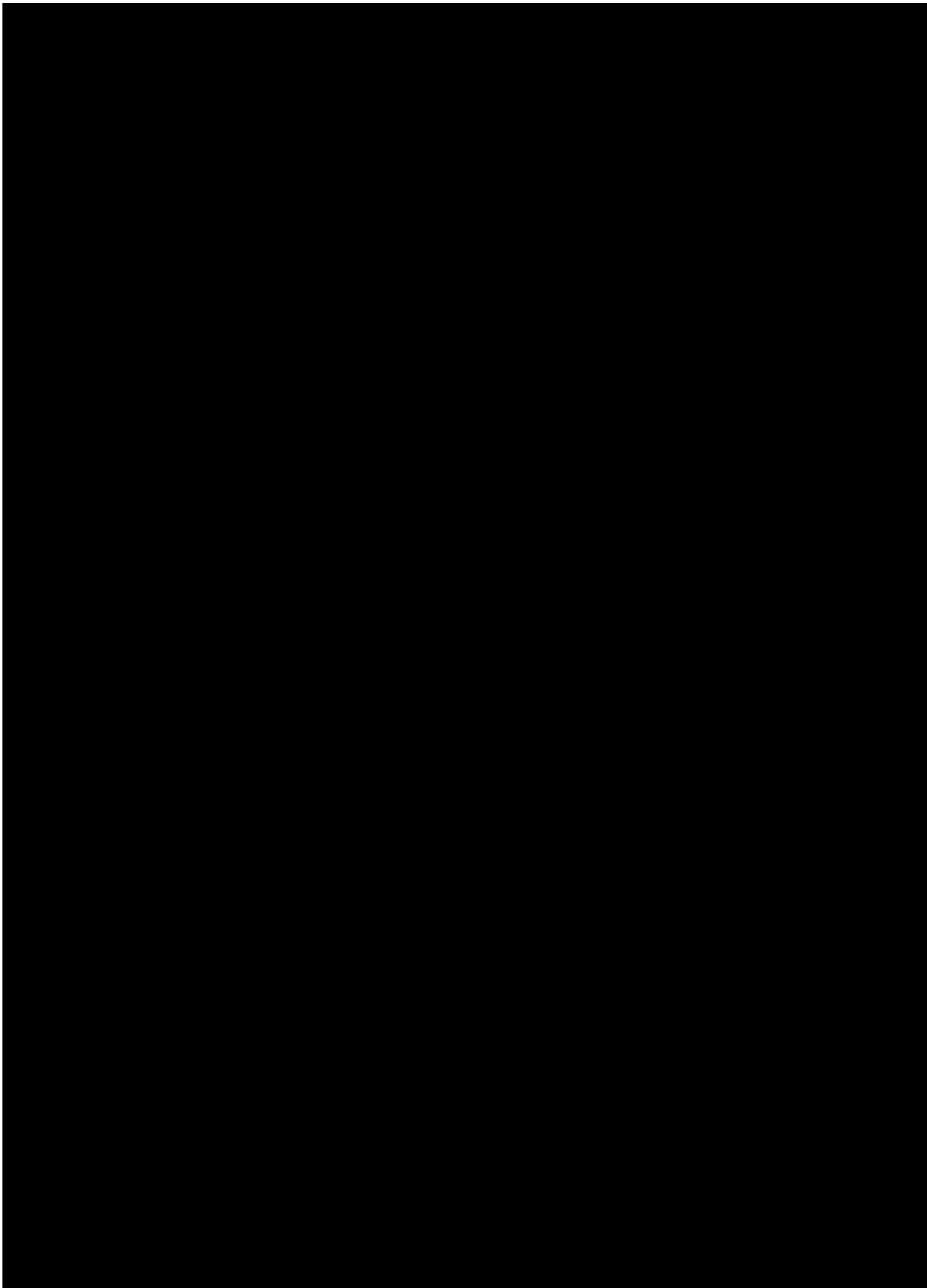
### Enquire Now

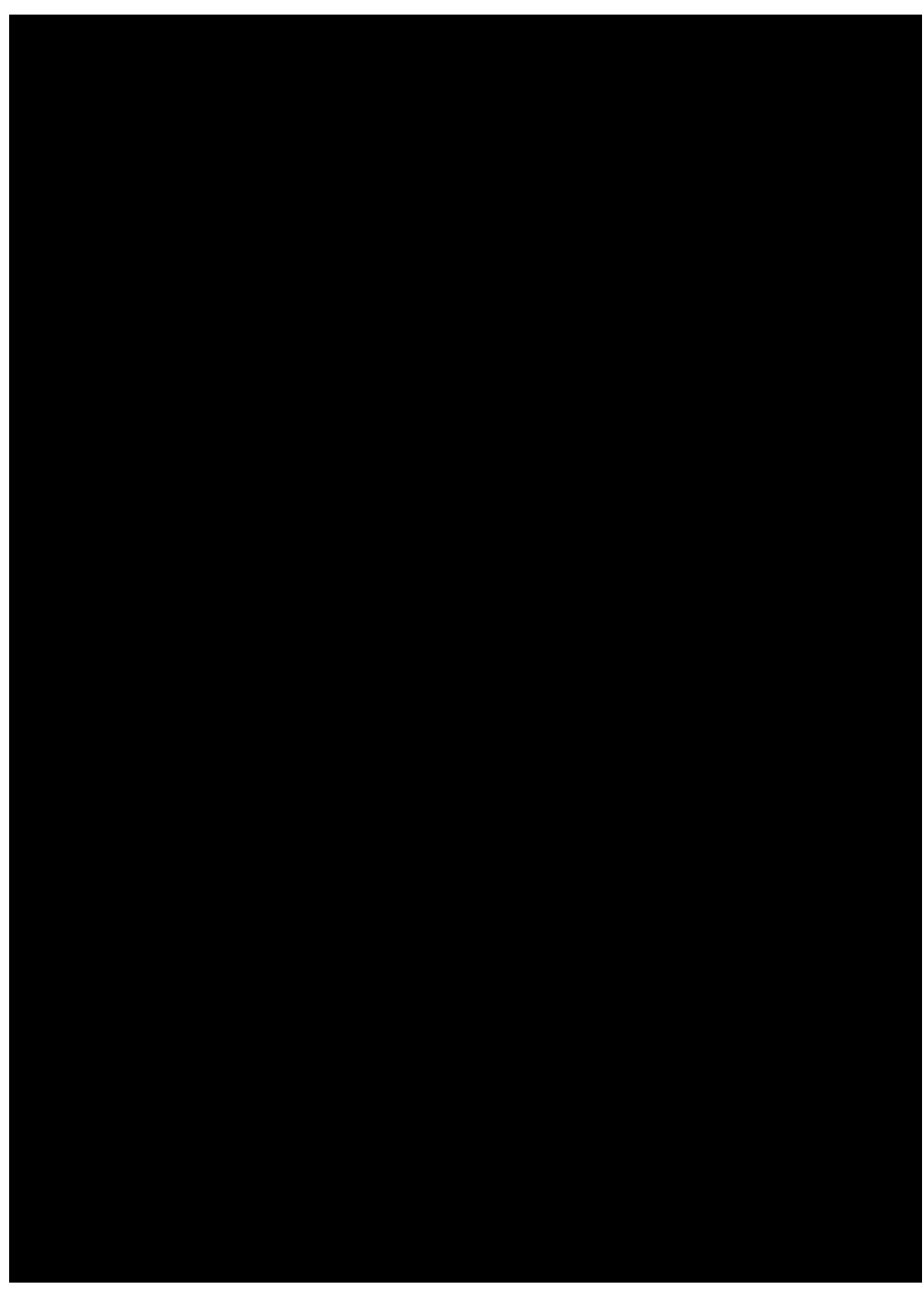
[Send Message](#)

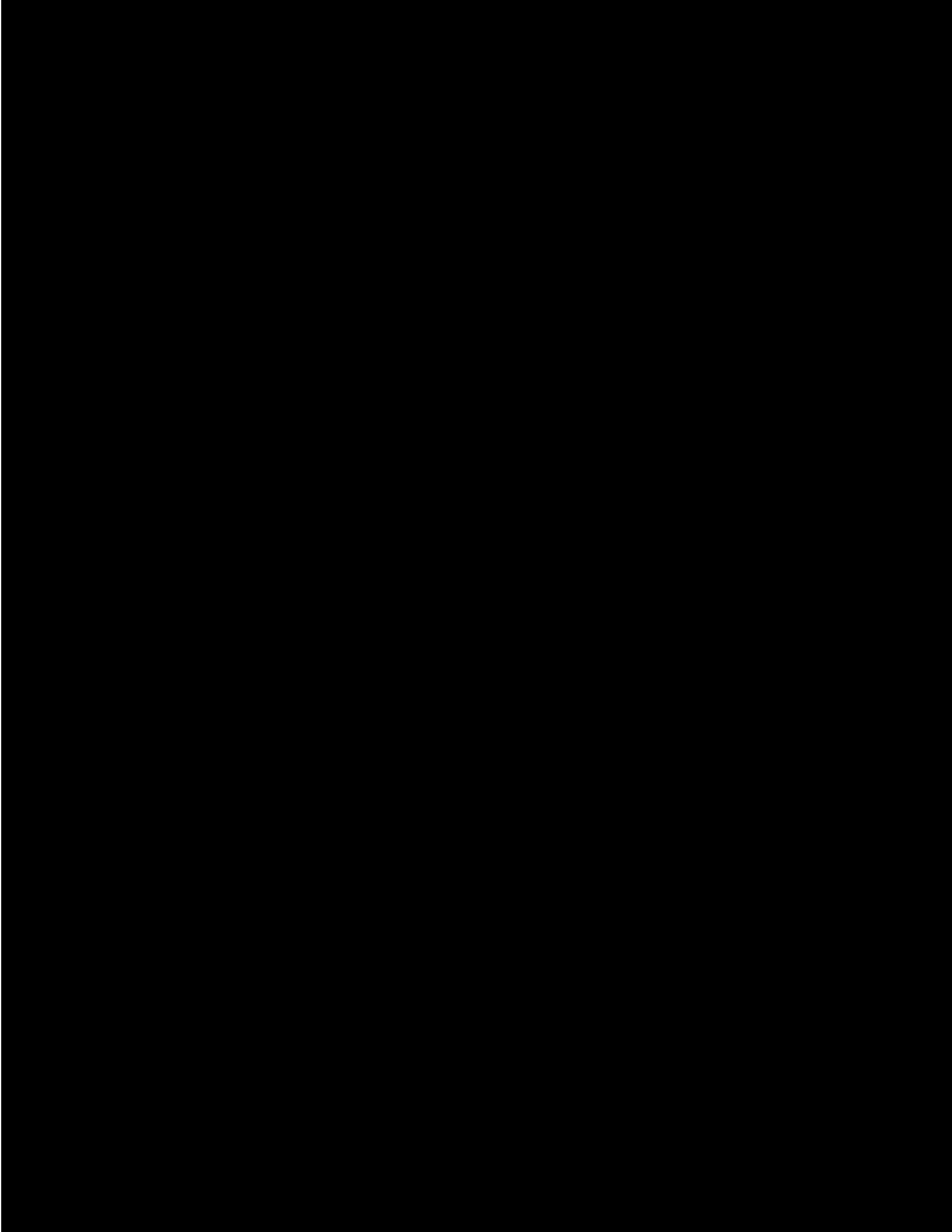
sky news

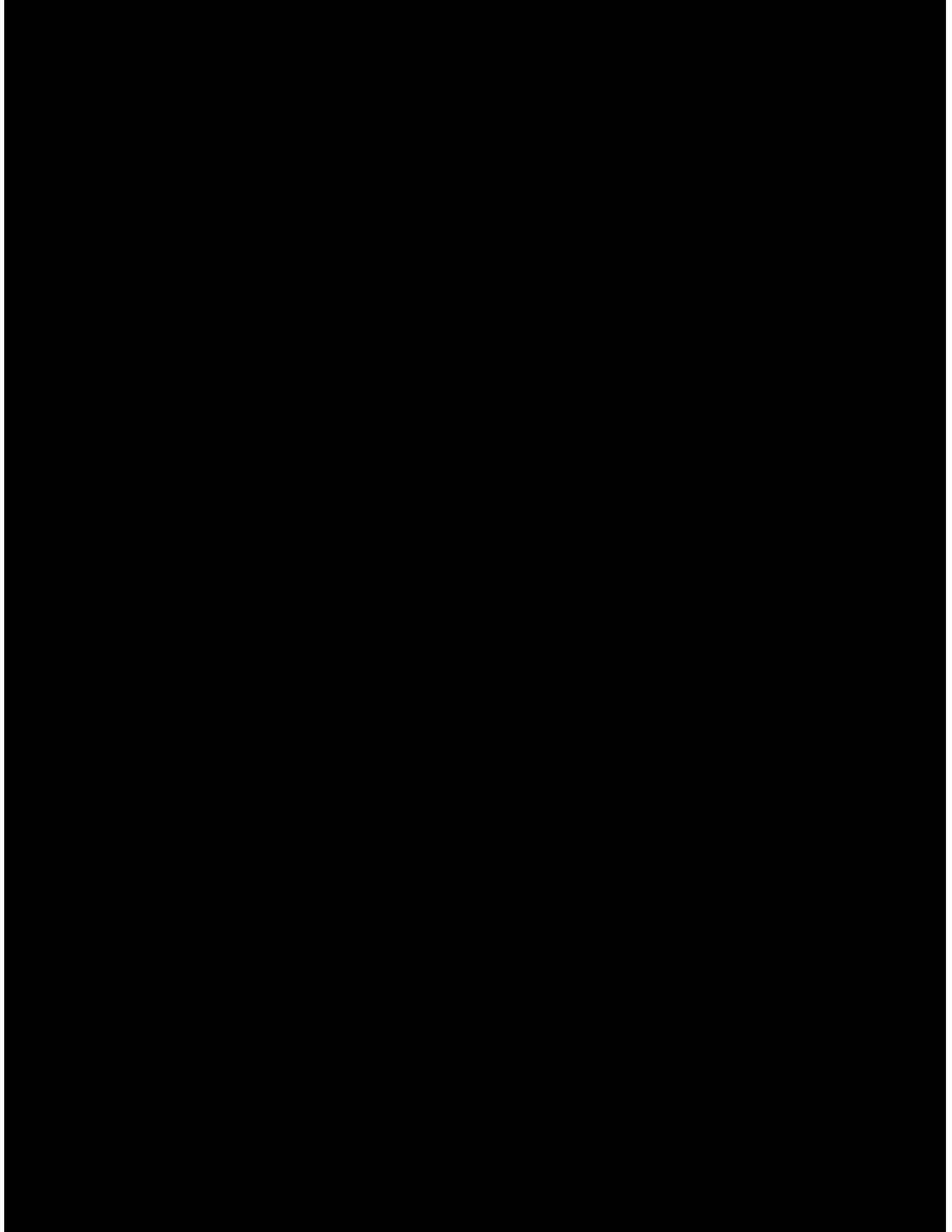
STREAM NOW

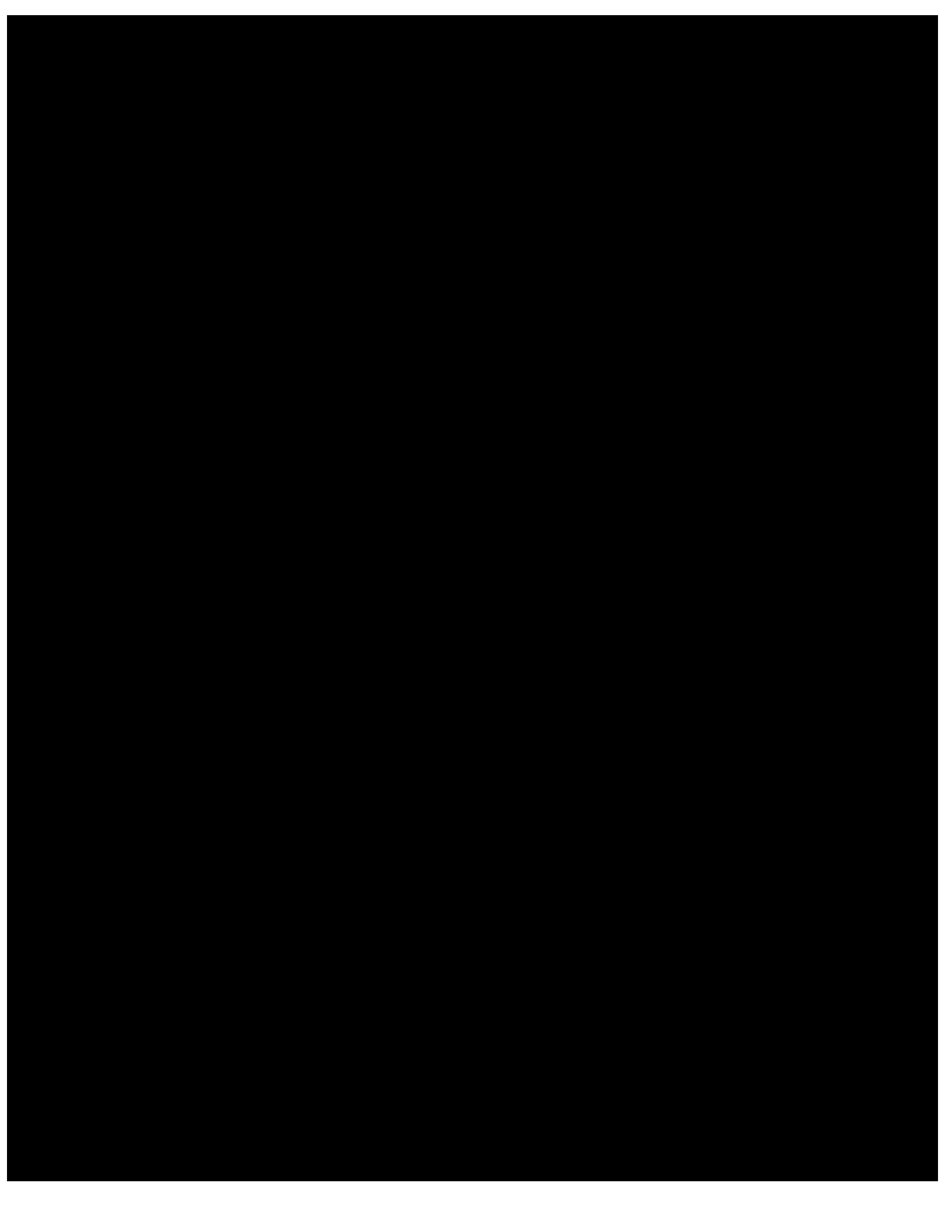
\*T&amp;Cs apply

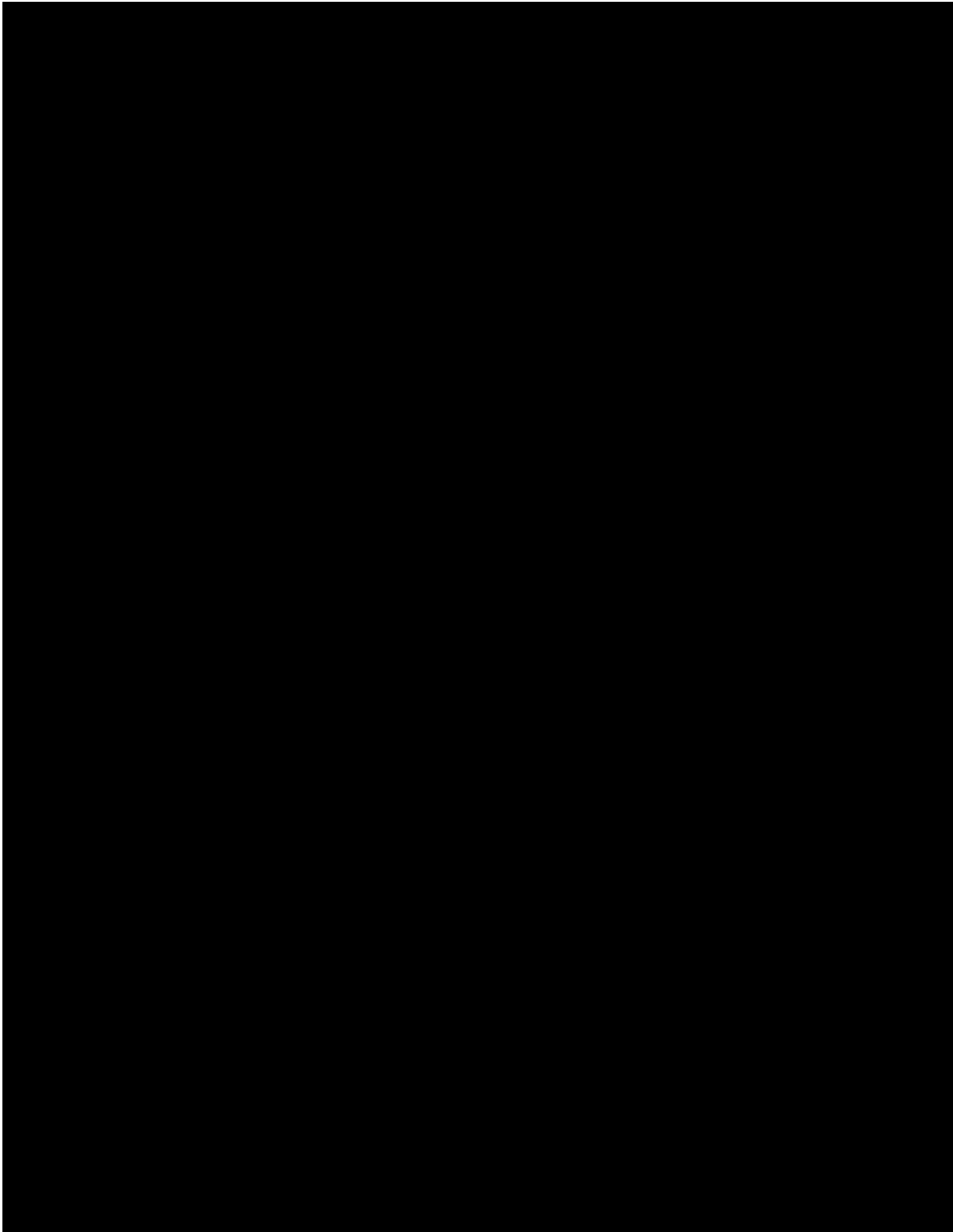


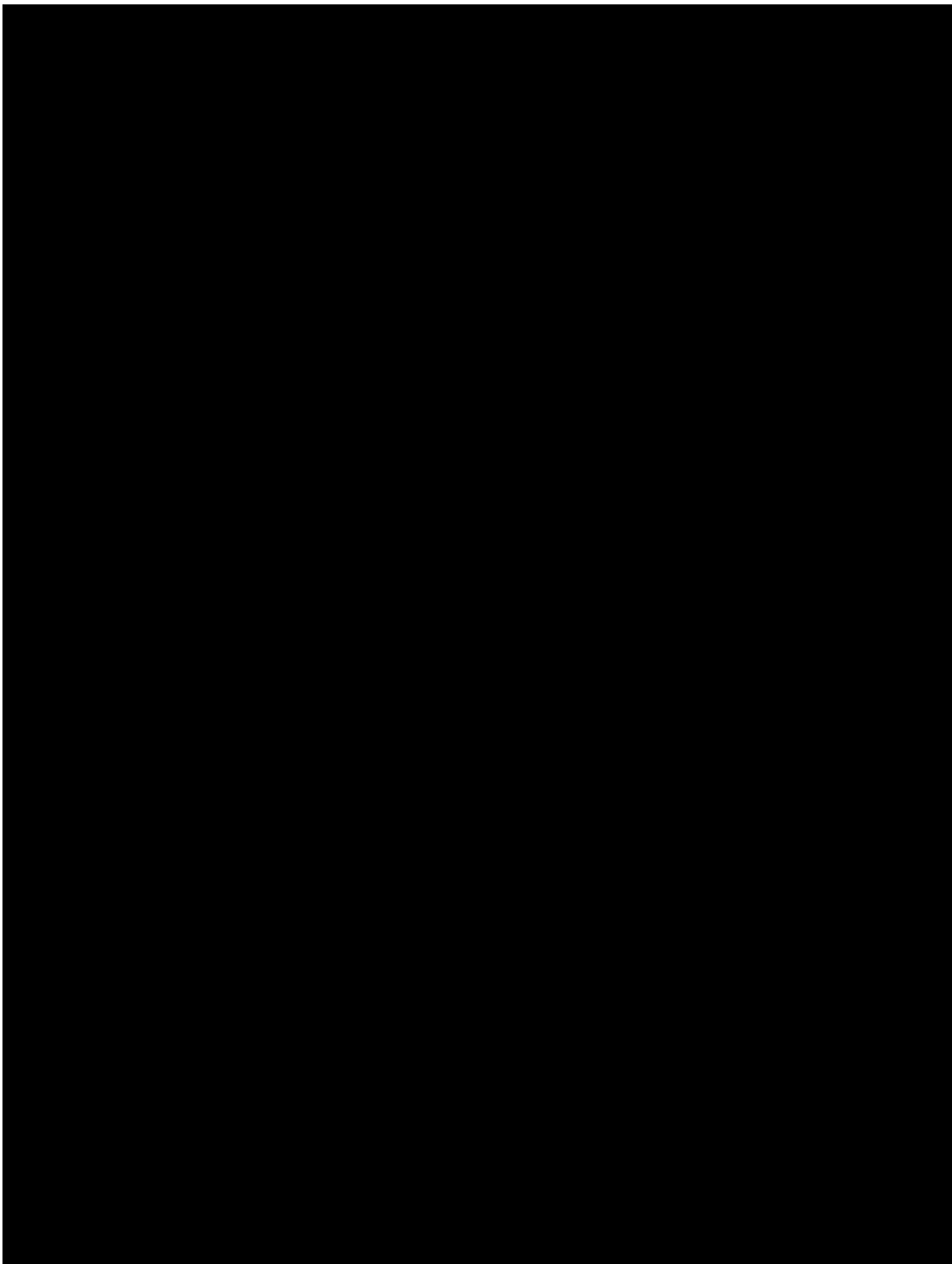












The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry, no matter how small, should be recorded to ensure the integrity of the financial data. This includes not only sales and purchases but also expenses and income. The document provides a detailed list of items that should be tracked, such as inventory levels, supplier payments, and customer orders. It also outlines the procedures for reconciling accounts and identifying discrepancies. The second part of the document focuses on the analysis of the recorded data. It describes various methods for interpreting the information, such as comparing current performance with historical trends and industry benchmarks. The document also discusses the implications of the data for decision-making, highlighting the need for timely and accurate information to support strategic planning. Finally, the document concludes with a summary of the key findings and recommendations for future actions. It stresses the importance of continuous monitoring and reporting to ensure the organization remains on track and achieves its financial goals.





























































The logo for URBIS, featuring the word "URBIS" in a bold, white, sans-serif font. The letters are contained within a white square frame that is open on the right and bottom sides. A white horizontal line extends from the right side of the square frame across the top of the page.

**URBIS**

# **ABORIGINAL CULTURAL HERITAGE ASSESSMENT DRAFT**

G25 Education Building  
UNSW Kensington Campus

Prepared for  
**UNSW**  
[DATE]

**URBIS STAFF RESPONSIBLE FOR THIS REPORT WERE:**

|                    |   |
|--------------------|---|
| Director           | Balazs Hansel, MA Archaeology, MA History, M. ICOMOS      |
| Associate Director | Ali Byrne, BA Archaeology                                 |
| Senior Consultant  | Aaron Olsen, Dip Arts (Archaeology), BSc (Hons), MIP, PhD |
| Consultant         | Ginger-Rose Harrington, BAnCHist (Archaeology)            |
| Project Number     | P0054776  |
| Report Version     | Draft issued to RAPs 5/11/2024                            |
|                    | Final issued [DATE]                                       |

**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.**

**We also acknowledge the Traditional Custodians of the UNSW Kensington Campus, the Bidjigal and Gadigal People.**

All information supplied to Urbis in order to conduct this research has been treated in the strictest confidence. It shall only be used in this context and shall not be made available to third parties without client authorisation. Confidential information has been stored securely and data provided by respondents, as well as their identity, has been treated in the strictest confidence and all assurance given to respondents have been and shall be fulfilled.

© Urbis Ltd  
50 105 256 228

All Rights Reserved. No material may be reproduced without prior permission.

You must read the important disclaimer appearing within the body of this report.

**urbis.com.au**

## CONSULTANT DECLARATION

| PROJECT DETAILS                         |  |
|---|--|
| <b>PROJECT NAME</b>                     |  |
| Application number                      | SSD-74670005   |
| Address of subject land                 | G25  |
| Lot / DP                                | Lot 5 DP 1264171   |
| <b>APPLICANT DETAILS</b>                |  |
| Applicant name                          | University of NSW  |
| Applicant address                       | UNSW Estate Management<br>Level 3, Mathews Building F23<br>UNSW Sydney High St<br>Kensington NSW 2052<br>Australia   |
| <b>REPORT DETAILS</b>                   |  |
| Name of report this declaration relates | Aboriginal Cultural Heritage Assessment, G25 Education Building, UNSW Kensington Campus  |
| Report reference no.                    | P0054776   |
| Report date                             | [DATE]   |
| Company name (inc. ABN / ACN)           | Urbis Ltd / 50 105 256 228   |
| Author name                             |  |
| Author qualifications                   |  |
| Author address                          |  |
| <b>DECLARATION BY CONSULTANT</b>        |  |
| Name                                    |  |
| Registration no.                        |  |
| Organisation registered with            |  |
| Declaration                             | <p>The undersigned declares that this Aboriginal Cultural Heritage Assessment:</p> <ul style="list-style-type: none"><li>• has been prepared in accordance with the following policy, guidelines, or legislative requirements:<ul style="list-style-type: none"><li>- <i>Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW</i> (OEH 2011b)</li><li>- <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> (DECCW 2010a)</li><li>- <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> (DECCW 2010b)</li></ul></li><li>• contains all available information relevant to the environmental assessment of the development, activity or infrastructure to which the Aboriginal Cultural Heritage Assessment relates;</li><li>• does not contain information that is false or misleading;</li><li>• identifies and addresses the relevant Planning Secretary's environmental assessment requirements (SEARs) for the project;</li><li>• identifies and addresses the relevant statutory requirements for the project, including any relevant matters for consideration in environmental planning instruments to which the Aboriginal Cultural Heritage Assessment relates;</li><li>• contains a consolidated summary of the proposed or necessary mitigation measures</li></ul> |
| Signature                               |  |
| Date                                    | [DATE]   |

# CONTENTS

|   |           |
|---|-----------|
| <b>Glossary</b> .....   | <b>7</b>  |
| <b>Executive Summary</b> .....  | <b>10</b> |
| <b>1. Introduction</b> .....  | <b>12</b> |
| 1.1. Subject Area .....   | 13        |
| 1.2. Proposed Activity.....   | 13        |
| 1.3. Statutory Context.....   | 13        |
| 1.3.1. Environment Protection and Biodiversity Conservation Act 1999..... | 13        |
| 1.3.2. The National Parks and Wildlife Act 1974 .....                     | 14        |
| 1.4. Authorship.....  | 14        |
| 1.5. Limitations.....   | 14        |
| <b>2. Aboriginal Consultation</b> .....                                   | <b>17</b> |
| 2.1. Stage 1 – Notification and Registration .....                        | 17        |
| 2.1.1. Native Title .....   | 17        |
| 2.1.2. Identification of Cultural Knowledge Holders .....                 | 17        |
| 2.1.3. Registration of Interest.....                                      | 18        |
| 2.2. Stage 2 & 3 – Presenting and Gathering Information .....             | 18        |
| 2.2.1. Presentation of Project Information and Methodology .....          | 18        |
| 2.2.2. Site Visit and Meeting.....  | 19        |
| 2.3. Stage 4 – Review of Draft ACHA Report.....                           | 19        |
| <b>3. Desktop Assessment</b> .....  | <b>20</b> |
| 3.1. Archaeological Context.....  | 20        |
| 3.1.1. Aboriginal Land Use .....  | 20        |
| 3.1.2. Declared Aboriginal Places.....                                    | 21        |
| 3.1.3. Registered Aboriginal Objects.....                                 | 21        |
| 3.1.3.1. Identified Sites.....  | 22        |
| 3.1.3.2. Site Features.....   | 22        |
| 3.1.4. Previous Archaeological Investigations .....                       | 26        |
| 3.1.4.1. Investigations of the Subject area .....                         | 26        |
| 3.1.4.2. Regional Investigations.....                                     | 26        |
| 3.1.5. Existing Predictive Models .....                                   | 28        |
| 3.2. Environmental Context .....  | 28        |
| 3.2.1. Natural Landscape .....  | 28        |
| 3.2.2. Historical Ground Disturbance .....                                | 33        |
| 3.3. Local & Regional Character.....                                      | 38        |
| 3.4. Archaeological Potential .....                                       | 38        |
| 3.4.1. Predictive Model.....  | 38        |
| 3.4.2. Assessment of Potential .....                                      | 38        |
| 3.5. Summary.....   | 39        |
| <b>4. Visual Inspection</b> .....   | <b>41</b> |
| <b>5. Significance Assessment</b> .....                                   | <b>43</b> |
| 5.1. Framework for Assessment .....                                       | 43        |
| 5.2. Assessment of Heritage Values.....                                   | 43        |
| 5.2.1. Social or Cultural Value .....                                     | 43        |
| 5.2.2. Historic Value .....   | 44        |
| 5.2.3. Scientific (Archaeological) Value.....                             | 44        |
| 5.2.4. Aesthetic Value .....  | 44        |
| 5.3. Statement of Significance.....                                       | 45        |
| <b>6. Impact Assessment</b> .....   | <b>46</b> |

|                    |  |           |
|--------------------|--|-----------|
| 6.1.               | Framework for Assessment .....   | 46        |
| 6.2.               | Assessment of Potential Harm.....  | 46        |
| 6.3.               | Inter-Generational Equity.....   | 47        |
| 6.4.               | Avoidance & Minimisation of Harm .....   | 47        |
| <b>7.</b>          | <b>Research Design &amp; Excavation Methodology.....</b>   | <b>48</b> |
| 7.1.               | Objectives .....   | 48        |
| 7.2.               | Research Design.....   | 48        |
| 7.3.               | Archaeological Methodology.....  | 49        |
| 7.3.1.             | Excavation Staging.....  | 49        |
| 7.3.2.             | Standard Excavation Practices .....  | 49        |
| 7.3.2.1.           | Sampling .....   | 49        |
| 7.3.2.2.           | Notification .....   | 49        |
| 7.3.2.3.           | Archaeological Monitoring.....   | 50        |
| 7.3.2.4.           | Mechanical Excavation .....  | 50        |
| 7.3.2.5.           | Manual Excavation .....  | 50        |
| 7.3.2.6.           | Sieving .....  | 51        |
| 7.3.2.7.           | Archaeological Recording .....   | 52        |
| 7.3.2.8.           | Artefact Analysis.....   | 52        |
| 7.3.2.9.           | Care and Control .....   | 52        |
| 7.3.2.10.          | Reporting .....  | 52        |
| 7.3.2.11.          | Occupational Health and Safety.....  | 53        |
| 7.3.3.             | Excavation Team.....   | 53        |
| 7.4.               | Post-Excavation .....  | 54        |
| 7.5.               | Unexpected Finds Procedures.....   | 54        |
| 7.5.1.             | Unexpected Finds Procedure: Archaeological Material.....   | 54        |
| 7.5.2.             | Unexpected Finds Procedure: Human Remains.....   | 54        |
| <b>8.</b>          | <b>Conclusions &amp; Recommendations.....</b>  | <b>55</b> |
| <b>9.</b>          | <b>Mitigation Measures.....</b>  | <b>57</b> |
| <b>10.</b>         | <b>References .....</b>  | <b>59</b> |
|                    | <b>Disclaimer .....</b>  | <b>61</b> |
| <b>Appendix A</b>  | <b>Plans of Proposed Development</b>   |           |
| <b>Appendix B</b>  | <b>Basic and Extensive AHIMS Search Results</b>  |           |
| <b>Appendix C</b>  | <b>Registered Aboriginal Party Consultation Log</b>  |           |
| <b>Appendix D</b>  | <b>Registered Aboriginal Party Consultation Documentation</b>  |           |
| <b>Appendix E</b>  | <b>Geotechnical Report</b>   |           |
| <br><b>FIGURES</b> |  |           |
| Figure 1 –         | Regional location of subject area.....   | 15        |
| Figure 2 –         | Subject area boundary .....  | 16        |
| Figure 3 –         | Locations of registered Aboriginal site in AHIMS search area .....   | 24        |
| Figure 4 –         | Locations of registered Aboriginal site in proximity to the subject area .....   | 25        |
| Figure 5 –         | Topography.....  | 30        |
| Figure 6 –         | Soil landscapes and hydrology .....  | 31        |
| Figure 7 –         | Detail of “Plan Shewing Present Water Supply and Proposed Improvements, 1869”,<br>indicating the location of the subject area (in red) in relation to the nearby swamp east of Botany Road ..... | 32        |
| Figure 8 –         | Detail of map of the ‘Parish of Alexandria’ from 1900 showing the location of the subject<br>area (red outline) within the Benevolent Asylum reserve (shaded pink).....                          | 34        |
| Figure 9 –         | Detail of map of the ‘Parish of Alexandria’ from 1913 showing the location of the subject<br>area (red outline) located within ‘Randwick Park’ (shaded green) .....                              | 34        |

|  |    |
|--|----|
| Figure 10 – Aerial image of subject area (red outline), 1961 ..... | 35 |
| Figure 11 – Aerial image of subject area (red outline), 1971 ..... | 35 |
| Figure 12 – Aerial image of subject area (red outline), 1978 ..... | 36 |
| Figure 13 – Aerial image of subject area (red outline), 2010 ..... | 36 |
| Figure 14 – Historical ground disturbance .....                    | 37 |
| Figure 15 – Aboriginal archaeological potential .....              | 40 |

## **TABLES**

|   |    |
|---|----|
| Table 1 – SEARs requirements .....  | 12 |
| Table 2 – Contacted organisations .....   | 17 |
| Table 3 – Registered Aboriginal Parties .....   | 18 |
| Table 4 – RAP attendees at site visit and meeting.....                                  | 19 |
| Table 5 – RAP comments during site visit and meeting .....                              | 19 |
| Table 6 – RAP responses to the Stage 4 Draft ACHA Report .....                          | 19 |
| Table 7 – Summary of registered Aboriginal site features in the AHIMS search area ..... | 23 |
| Table 8 – Mitigation Measures .....   | 57 |

DRAFT

# 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 handcraft 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.   |

| <b>Term</b>          | <b>Definition</b>  |
|----------------------|--|
| 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'.  |

| <b>Term</b>                         | <b>Definition</b>  |
|-------------------------------------|--|
| 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 the University of NSW ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of a portion of the UNSW Kensington Campus at 8 High Street,, Kensington, NSW, legally defined as part Lot 5 in DP1264171 ('the subject area').

The Proponent is seeking approval for redevelopment of the subject area to provide a new multi-storey education building. Approval is being sought for the development under a State Significant Development Application (SSD-74670005), under Division 4.7 of the *Environmental Planning and Assessment Act 1979* (NSW). The present ACHA has been prepared to meet Item 19 of the Planning Secretary's Environmental Assessment Requirements (SEARs) issued on 15 August 2014.

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 subject area is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject area 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 area.

- **Conclusion 2 – Sensitive Landscape Features**

The entire subject area is located within a sand dune system (the Newport soil landscape) and within 200 m of water (part of the now-reclaimed Bird's Gully swamp system on the opposite side of Botany Road), both of which are considered indicative of likely past Aboriginal land use.

- **Conclusion 3 – Historical Ground Disturbance**

As confirmed by a geotechnical investigation (Douglas Partners 2024), historical ground disturbance is assessed to be moderate across most of the subject area (natural A-horizon sands of 0.2 to 1.1 thick below a depth of about 1.0 to 1.6 m), the exception being a portion on the western boundary having been subjected to high ground disturbance (no natural A-horizon).

- **Conclusion 4 – Archaeological Potential**

Applying the predictive model, the Aboriginal archaeological potential of the subject area is assessed to be **High** across most of the subject area, but **Very Low** in the highly disturbed area on the western boundary.

- **Conclusion 5 – Significance Assessment**

The subject area has moderate social and cultural significance to the local Aboriginal community for its proximity to the nearby Bird's Gully swamp and associated camping sites dating to at least the early Holocene.

**[TO BE UPDATED IN VIEW OF RAP COMMENTS AFTER STAGE 4]**

- **Conclusion 6 – Impact Assessment**

As the proposed ground disturbing works encompass an area of high archaeological potential, the proposed development is likely to cause direct harm to Aboriginal objects.

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-74670005.

▪ **Recommendation 2 – Further Archaeological Investigation**

As the proposed works are likely to cause harm to Aboriginal objects, it is recommended that further archaeological investigation be undertaken at the commencement of the proposed works, prior to construction commencing. The further archaeological investigation should comprise a subsurface Aboriginal archaeological excavation program undertaken in accordance with the Archaeological Research Design and Excavation Methodology detailed in Section 7 of this report. The subsurface excavation program should be undertaken with the participation of nominated Aboriginal RAPs and appropriately qualified archaeologists. To avoid unnecessary harm to Aboriginal objects and existing improvements and to avoid unnecessary disruption of UNSW operations, it is recommended that the subsurface excavation be undertaken after approval of SSD-74670005.

A post-excavation report should be prepared after completion of the subsurface excavation program that presents the findings excavation, provides a reassessment of the significance of the subject area and sets out further management recommendations to mitigate harm to any identified Aboriginal objects.

▪ **Recommendation 3 – Unexpected Finds Protocol: Archaeological Material**

In the event that any archaeological material is uncovered during any site works, the following steps must be carried out:

- (a) All works must halt in the immediate area of the find to prevent any further impacts to the archaeological material.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist and the Registered Aboriginal Parties for the ACHA must be contacted to determine the significance of the objects.
- (d) If determined to be an Aboriginal object, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided to AHIMS.
- (e) Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
- (f) The Applicant must consult with the Aboriginal community representatives, the archaeologist(s) and Heritage NSW to develop and implement management strategies for all Aboriginal objects.
- (g) Works may only recommence in the vicinity of the find with the approval of Heritage NSW.

▪ **Recommendation 4 – Unexpected Finds Protocol: Human Remains**

In the event that any human remains are uncovered during any site works, the following steps must be carried out:

- (a) All works must cease immediately in that area and the NSW Police and Heritage NSW contacted.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains.
- (d) The Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the human remains.
- (e) Works shall only recommence with the approval of Heritage NSW.

# 1. INTRODUCTION

Urbis was engaged by the University of New South Wales ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of a portion of the UNSW Kensington Campus at 8 High Street, Kensington, , NSW, legally defined as part Lot 5 in DP1264171 ('the subject area') (Figure 1 and Figure 2).

The Proponent is seeking approval for redevelopment of the subject area to provide a new multi-storey education building, to be known as the 'UNSW G25 Education Building'. Specific details of this building are as follows:

- A 12-storey building and associated rooftop plant/servicing, with approximately 25,000 m<sup>2</sup> of gross floor area (over 12-storeys), plus basement and plant.
- Associated landscaping and public domain works.

Approval is being sought for the development via a State Significant Development Application (SSD-74670005), under Division 4.7 of the *Environmental Planning and Assessment Act 1979* (NSW). SSD-74670005 seeks approval for the construction and operation of the G25 Education Building, which involves the following:

- Site preparation works including demolition of the existing at-grade car park,
- Construction of a new Teaching and Learning Building.

The Proposal will seek to deliver improvements including:

- Providing new learning spaces for university activities to further support the growth and development of the Randwick Health and Education Precinct.
- Delivering an enhanced ground plane connection.
- Providing flexible and adaptable teaching and learning spaces.
- Creating a healthy, green, and welcoming place for students, staff and visitors.
- Creating an experience that is an open, permeable, and connected public realm.
- Creating pedestrian priority and inclusive shared public space.

For a detailed project description refer to the Environmental Impact Statement prepared by Ethos Urban.

The present ACHA has been prepared to meet Item 19 of the Planning Secretary's Environmental Assessment Requirements (SEARs) issued on 15 August 2024, which is presented in Table 1 below.

Table 1 – SEARs requirements

| Item                             | Requirement  | Documentation                       |
|----------------------------------|--|-------------------------------------|
| 19. 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. | Aboriginal Cultural Heritage 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:

- *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 area is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject area and to formulate measures for avoiding or minimising any such impacts.

## 1.1. SUBJECT AREA

The subject area is located with the University of NSW Kensington Campus at 356 Anzac Parade, Kensington, NSW and is legally defined as part Lot 5 in DP1264171 (Figure 1 and Figure 2). It is located approximately 6 km south-east of the Sydney CBD and is within the City of Randwick Local Government Area ('Randwick LGA') the administrative boundaries La Perouse Local Aboriginal Land Council ('La Perouse LALC'). It is currently zoned SP2 – Educational Establishment.

The subject area encompasses an area of approximately 5,100 m<sup>2</sup> and fronts Library Walk to the north and Chancellery Walk to the west. It is further bounded by a multistorey car park to the south and the Australian Graduate School of Management building to the east. Existing improvements include on-grade carparking, lighting and landscaping.

## 1.2. PROPOSED ACTIVITY

The proposed redevelopment of the subject area comprises the construction and operation of a teaching and learning facility to be known as the UNSW G25 Education Building.

The proposed works for which approval is sought under SSD-74670005 include:

- Site preparation works including demolition of the existing at-grade car park
- Construction of a new teaching and learning building, including:
  - A 12-storey building and associated rooftop plant/servicing, with approximately 25,000 m<sup>2</sup> of gross floor area (over 12 storeys), plus basement and plant.
  - Associated landscaping and public domain works.

Plans of the proposed development are provided in Appendix A.

## 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 area.

### 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 25 July 2024. The search did not identify any Aboriginal heritage properties or places within the curtilage of the subject area 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).

As noted in Section 1 above, the ACHA was undertaken in support of a State Significant Development Application, which seeks approval for the proposed works outlined in Section 1.2.

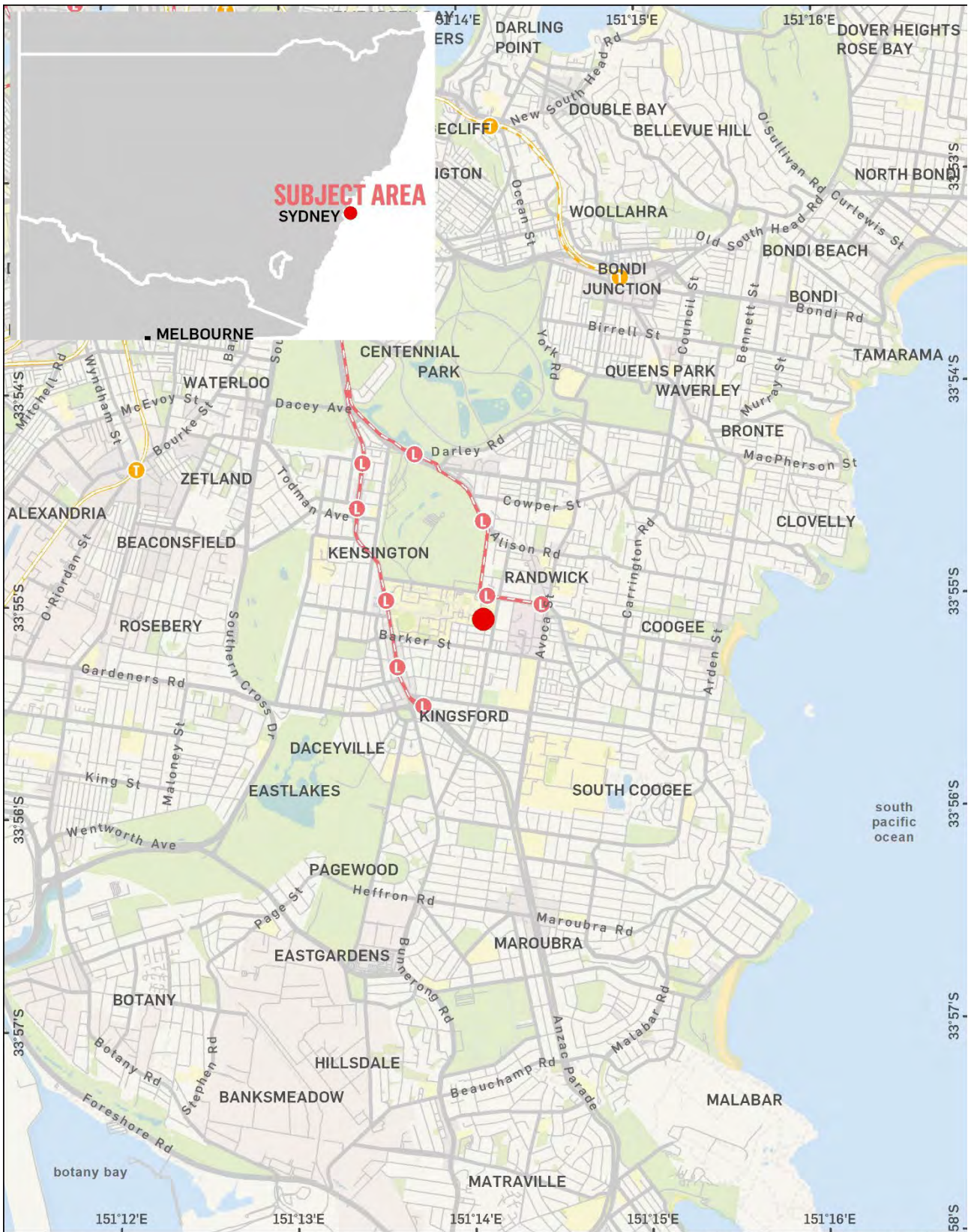
## 1.4. AUTHORSHIP

The present report has been prepared by Juliet Scholefield (Assistant Archaeologist, Urbis) and Aaron Olsen (Senior Archaeologist, Urbis), with review and quality control undertaken by Ali Byrne (Urbis Associated Director, Archaeology) and Balazs Hansel (Urbis Director, Archaeology).

Juliet Scholefield holds a Bachelor of Arts (Archaeology) and a Bachelor of Advanced Studies (Design) from the University of Sydney. 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. Ali Byrne holds a Bachelor of Arts (Archaeology) from the University of Sydney. Balazs Hansel holds a Masters (History) and Masters (Archaeology and Museum Studies) from the University of Szeged (Hungary).

## 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.



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap. Helping shape our cities, one map at a time. Jul 2024



Project No: P0054776  
Project Manager: Aaron Olsen

● Subject Area

**REGIONAL LOCATION**  
UNSW G25 Development  
UNSW

Figure 1 – Regional location of subject area



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap, Nemap. Helping shape our cities, one map at a time. Aug 2024



Project No: P0054776  
 Project Manager: Aaron Olsen

Subject Area    — Contours

**LOCATION OF THE SUBJECT AREA**  
 UNSW G25 Development  
 UNSW

Figure 2 – Subject area boundary

## 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 area.

#### 2.1.1. Native Title

A search of the National Native Title Tribunal (NNTT) registers and databases was undertaken on 25 July 2024. The search identified no pending Native Title claims or Native Title registrations for the subject area. The NNTT was also contacted by email on 25 July 2024 to request a formal search of the NNTT Register. A reply was received on 25 July 2024 indicating that there are no Native Title matters overlapping with the subject area.

#### 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 July 2024 (Table 2). A copy of the email sent to each of the contacted organisations is included in Appendix D. A total of 33 Aboriginal parties with a potential interest in the subject area were identified during this stage.

Table 2 – Contacted organisations

| Organisation   | Notification Sent | Response Received |
|--|-------------------|-------------------|
| Greater Sydney Local Land Services                       | 19 July 2024      | 22 July 2024      |
| Heritage NSW   | 19 July 2024      | 23 July 2024      |
| La Perouse Local Aboriginal Land Council                 | 19 July 2024      | n/a               |
| National Native Title Tribunal                           | 19 July 2024      | 19 July 2024      |
| NTS Corp   | 19 July 2024      | n/a               |
| Office of the Registrar, Aboriginal Land Rights Act 1983 | 19 July 2024      | 24 July 2024      |
| Randwick City Council                                    | 19 July 2024      | 22 July 2024      |

Letters were sent to the 33 identified Aboriginal parties by either email or mail on 1 August 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 area and set a deadline for response of 15 August 2024, providing 14 days to register an interest. A copy of the letter is included in Appendix D.

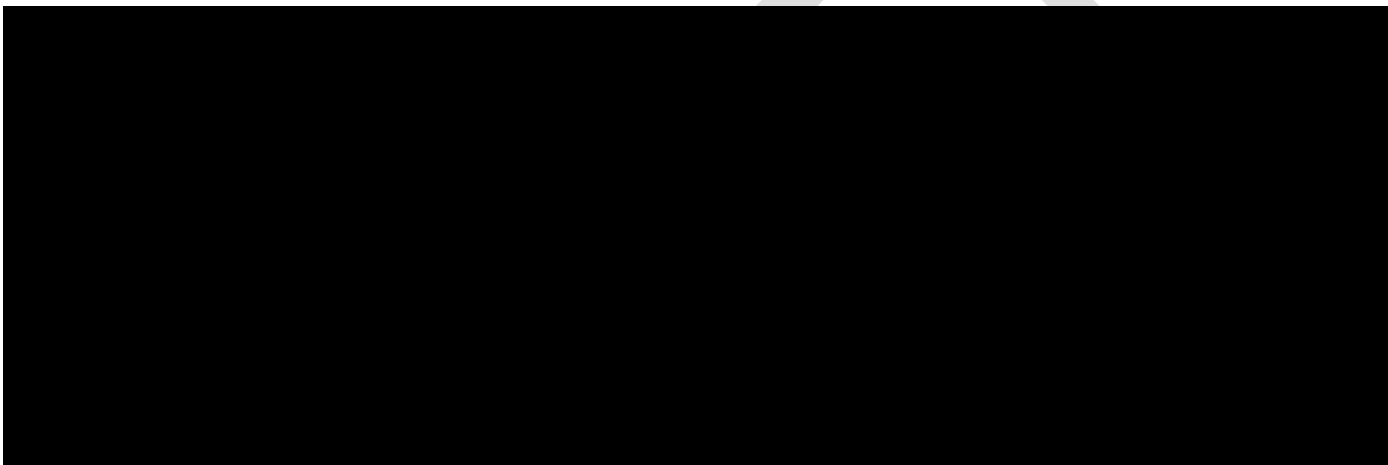
A public notice was also placed in a local newspaper to open registration to the broader Aboriginal community. A search of an online database of local newspapers ('newspapers.com.au') was undertaken to identify local newspapers within the Kensington area. The search did not identify any local newspapers with circulation in Kensington. The public notice was therefore placed in the online classified advertisement section of the Daily Telegraph ('https://www.buysearchsell.com.au'). The advertisement was published online on 2 August 2024 and registration was open until 16 August 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 five (5) Aboriginal parties registered interest in the project as a result of this phase (Table 3). The La Perouse Local Aboriginal Land Council was registered despite not responding. 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 La Perouse Local Aboriginal Land Council on 23 August 2024 (see Appendix C).

Table 3 – Registered Aboriginal Parties



## **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.

### **2.2.1. Presentation of Project Information and Methodology**

A Stage 2 & 3 information pack was sent to registered Aboriginal parties via email on 22 August 2024. The information pack was prepared as a combination of Stage 2 and 3 of the Consultation Guidelines, and included the following information:

- An outline of the proposal and an overview of the subject area.
- The proposed methodology for the ACHA, including the impact assessment process and input points for RAPs into the investigation and assessment.
- Critical timelines and milestones for the completion of assessment activities and delivery of reports.
- Agreed roles, functions and responsibilities.
- A request for comment on methodology, recommendations for site investigation any cultural information the respondent wished to share.

A response to the Stage 2 & 3 information pack was requested by 19 September 2023, providing 28 days to respond. A copy of the Stage 2 & 3 information pack is included in Appendix C.

No responses were received the RAPs in relation to the Stage 2 & 3 information pack.

## 2.2.2. Site Visit and Meeting

A separate communication was sent on 26 September 2024 to [REDACTED], who were randomly selected from the list of registered parties. The communication invited the RAPs to register for a site visit and meeting to be held on 30 September 2024 as part of Stage 2 & 3 of the consultation process.

The purpose of the site inspection and meeting was to conduct a thorough briefing with the RAPs about the proposed development, to conduct a walkover of the subject area with the RAPs, to discuss the information provided in the Stage 2 & 3 information pack and to discuss potential archaeological mitigation strategies.

The RAPs who attended the site visit and meeting are listed in Table 4 below. Unfortunately, due to a miscommunication, [REDACTED] attended the wrong location and was not able to participate in the site visit. Relevant comments received from the RAPs during the site visit and meeting are presented and addressed in Table 5 below.

Table 4 – RAP attendees at site visit and meeting

[REDACTED]

Table 5 – RAP comments during site visit and meeting

[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 [DATE] with comment on the draft ACHAR requested by [DATE], providing 28 days to respond. [##] responses were received in relation to the Stage 4 draft ACHA report. The responses are included in Appendix C and addressed in Table 6 below.

Table 6 – RAP responses to the Stage 4 Draft ACHA Report

| RAP   | Comments | Urbis Response |
|-------|----------|----------------|
| [...] | [...]    | [...]          |

[TO BE COMPLETED AFTER STAGE 4]

## 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 area is likely to retain any unknown Aboriginal objects. The findings of the desktop assessment inform the archaeological survey of the subject area and contribute to the determining whether an archaeological test excavation is required.

### 3.1. ARCHAEOLOGICAL CONTEXT

The archaeological context of the subject area 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 area 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 51 km north-west of the present subject area, which is dated to around 36,000 years ago (Williams et al. 2014). The earliest date for an Aboriginal presence in the vicinity of the subject area is around 8,400 years ago at the Prince of Wales Hospital site, approximately 300 m southeast of the subject area (Attenbrow 2010:18; see also Section 3.1.4.2 below).

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). Given the early contact with Aboriginal people in the Sydney region, more is known about these groups than those that inhabited regional areas. Despite this, there is uncertainty about the which local Aboriginal group traditionally resided in the region around the subject area. Both the Gadigal (also known as the "Cadigal") and the Bidiagal (also known as the "Bideegal") have been linked to the region immediately north of Botany Bay to Parramatta (Attenbrow 2010:22-27; Kohen 1993), which includes the present subject area. However, it has also been argued that the Bidiagal lived northwest of Parramatta and that their presence near Botany Bay, reported by Tench (1793), was due to relocation after a smallpox epidemic (Attenbrow 2010:27). Regardless, the region around the subject area was likely home to generations of both Gadigal and Bidiagal people, among many other groups that followed after the arrival of Europeans and displacement from the traditional lands.

The swamps and associated heath lands of the coastal fringes around the subject area provided a dynamic source of essential food resources. Utilised during short periods of habitation, the swamplands provided bountiful resources, including shellfish, plants, roots and figs. Kangaroo, possum, emus and reptiles were also hunted in the local area using double-pronged spears, while fish were caught from the local waterways using hooks and lines made from the silk of the Gorden Orb Weaving spider, dried *Lomandra* leaves and Kangaroo sinew.

As was the case throughout Australia, the local Aboriginal people of the region around the subject area 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 stone 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 local Aboriginal people are likely to have utilised the resources afforded by the local forests and waterways. Ethnographic accounts detail the heavy reliance on small bark huts for shelter

recounting that they were “formed of pieces of bark from several trees put together in the form of an oven with an entrance large enough to hold six to eight people” (Tench 1789). The ephemeral nature and perishable material from which these dwellings were built means that they are unlikely to survive in the archaeological record. By contrast, caves and overhangs provided shelter in coastal areas where Hawkesbury sandstone is exposed, typically near waterways. These shelters provide ideal conditions for preservation of evidence of Aboriginal habitation, including discarded tools and faunal material as well as engraved and pigment art.

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 area.

### 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 25 July 2024. The search did not identify any declared Aboriginal places, or any other heritage items, within the subject area.

### 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’ context 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 26 July 2024 (AHIMS Client Service ID: 913947) for an area of approximately 8 km x 8 km centred on the subject area. The search was undertaken to determine if:

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

The Basic and Extensive AHIMS search results are included in Appendix B. The results of the search are discussed below.

### 3.1.3.1. Identified Sites

A total of 59 Aboriginal sites are registered in the search area. Two of the recorded Aboriginal sites were identified as 'not a site' in the search results and two were identified as a 'reburial', reducing the total number of identified Aboriginal sites to 55. The locations of the 55 identified Aboriginal sites are shown in Figure 3.

The search did not identify any Aboriginal objects or Aboriginal places within the curtilage of the subject area.

The nearest confirmed registered sites to the subject area are located on the opposite side of Botany Road (Figure 4). These sites are described below.



Given their distance from the subject area and the small area occupied by hearths, neither site is likely to extend into the present subject area. However, both sites establish that the immediate surrounds of the subject area were used by Aboriginal people for camping, likely as dry ground with easy access to the resources of the swamp to the east of Botany Road.

In addition to the two confirmed Aboriginal sites discussed above, three PADS were identified within 600 m of the subject area: AHIMS ID# 45-6-3342, 45-6-3728 and 45-6-3729. The location and extent of each PAD is shown in Figure 4. None of the PADS overlap with the curtilage of the present subject area.

### 3.1.3.2. Site Features

A summary of the site features spread across the registered Aboriginal sites within the search area is provided in Table 7. Among the 55 registered Aboriginal sites in the search area, a total of 58 site features were identified of six different types: art, artefacts, grinding grooves, hearths, potential archaeological deposits (PADs) and shell.

Of the confirmed sites (i.e. excluding PADS), art and artefacts are the most common. Art is present in 25% of registered sites ( $n = 14$ ) and accounts for 24% of registered site features. The high representation of art sites is consistent with the coastal location of the subject area, where exposures of Hawkesbury sandstone provide a canvas for both engraved and pigment art. Similarly, shell sites ( $n = 4$ ) and grinding grooves ( $n = 1$ ) are also found in association with the coastline.

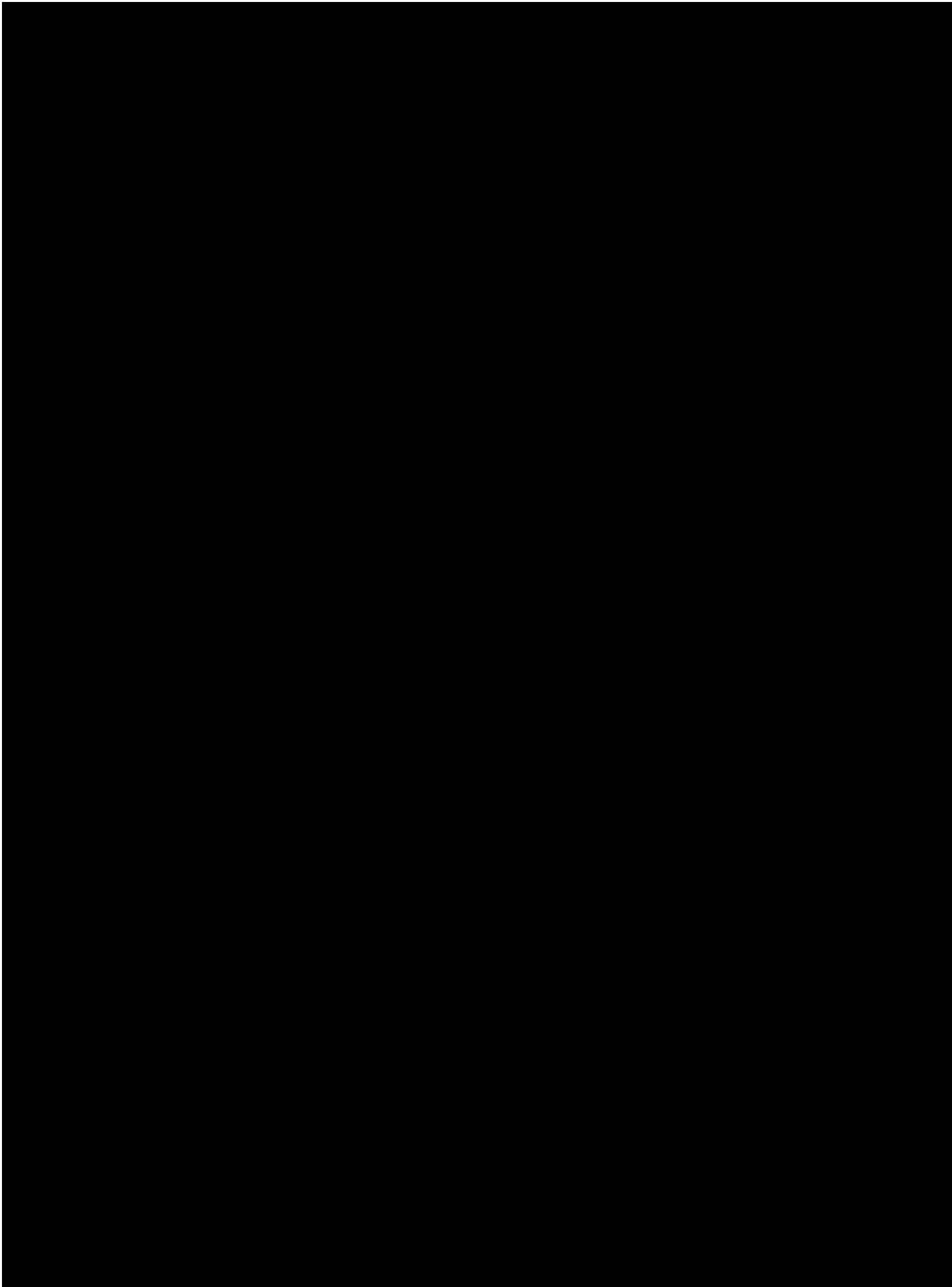
Artefacts are present in 20% of registered sites ( $n = 11$ ) and account for 19% of registered site features. This finding is consistent with the important role of stone tools in the everyday lives of Aboriginal people discussed in Section 3.1.1 above. Artefact sites are found across the search area, but a concentration is found in association with the nearby Lachland Swamplands. Similarly, the two hearth sites mentioned in the preceding section were found at margins of a swamp. These associations indicate the importance of swamps as sources of food and are consistent with the general predictive model for NSW, which consider natural water (including swamps) to be indicative of likely past Aboriginal land use (see Section 3.1.4. below).

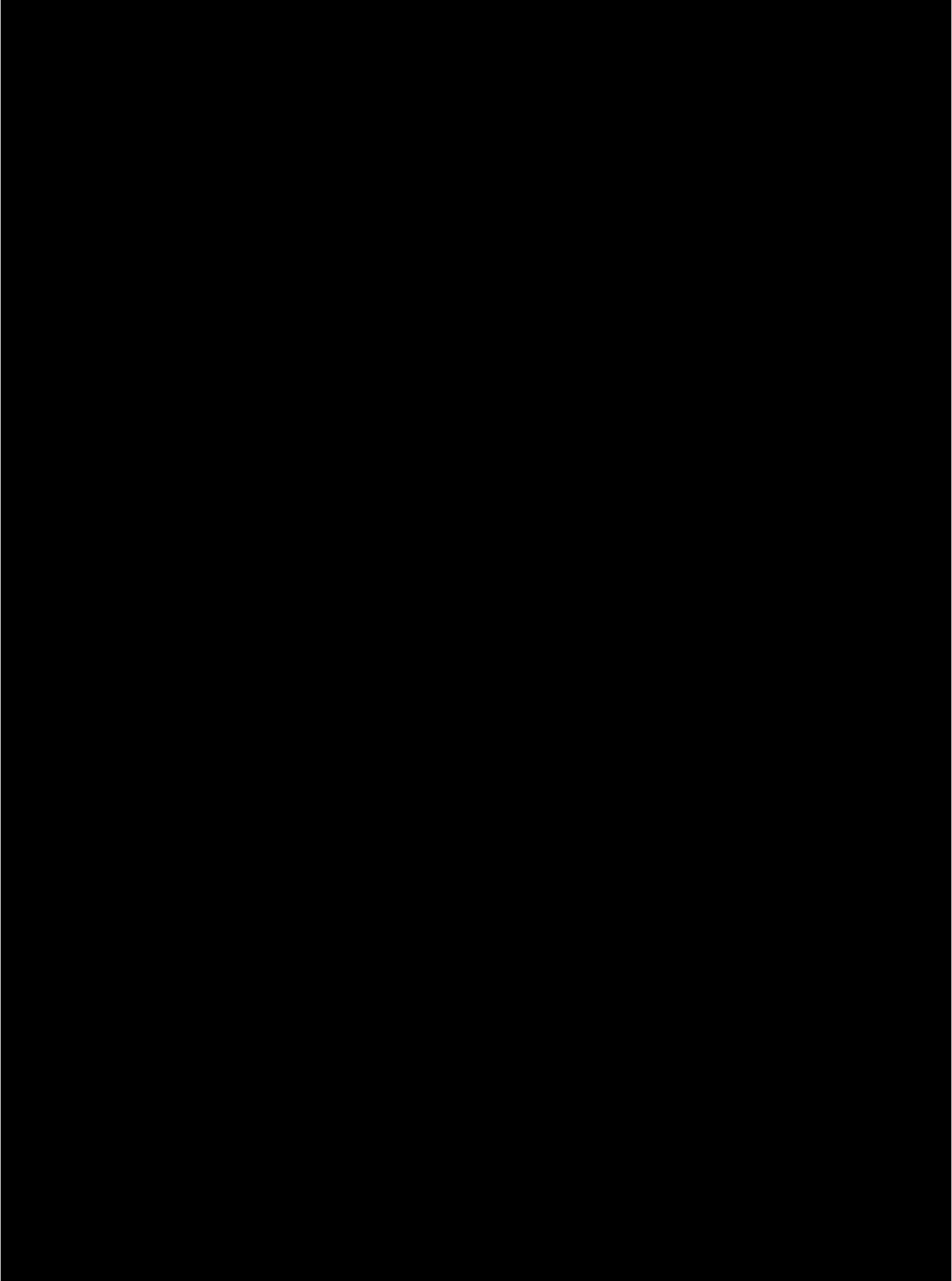
The contexts of the registered Aboriginal sites within the AHIMS search area are also summarised in Table 7 below. Most registered Aboriginal sites in the search area are in an open context, representing 65% ( $n = 36$ ) of all registered sites. All registered sites within the vicinity of the subject area are in an open context, consistent with the absence of rock outcrops in the swampy dune systems in which it is located (see Section 3.2.1 below).

Table 7 – Summary of registered Aboriginal site features in the AHIMS search area

| Site Features                          | Number              |                       |              | Frequency               |                            |
|--|---------------------|-----------------------|--------------|-------------------------|----------------------------|
|  | <i>Open Context</i> | <i>Closed Context</i> | <i>Total</i> | <i>% of Total Sites</i> | <i>% of Total Features</i> |
| Potential Archaeological Deposit (PAD) | 13                  | 13                    | 26           | 47%                     | 45%                        |
| Art                                    | 10                  | 4                     | 14           | 25%                     | 24%                        |
| Artefact                               | 10                  | 1                     | 11           | 20%                     | 19%                        |
| Shell                                  | 1                   | 3                     | 4            | 7%                      | 7%                         |
| Hearth                                 | 2                   | 0                     | 2            | 4%                      | 3%                         |
| Grinding Groove                        | 1                   | 0                     | 1            | 2%                      | 2%                         |

DRAFT





### 3.1.4. Previous Archaeological Investigations

Previous Aboriginal archaeological investigations undertaken within or near to the subject area 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 area.

#### 3.1.4.1. Investigations of the Subject area

No previous archaeological reports relating directly to the subject area have been identified.

#### 3.1.4.2. Regional Investigations

A review of the relevant investigations which have been undertaken within the local area is provided below. This is a non-exhaustive selection.

**Urbis (2023)** undertook an Aboriginal archaeological investigation of the Royal Randwick Racecourse Hotel, Randwick NSW approximately 500m north of the present subject area. The archaeological investigation consisted of a desktop assessment and visual inspection. The desktop assessment did not identify any known Aboriginal objects or Aboriginal places within the subject area. However, the assessment considered the potential for Aboriginal archaeological deposits within intact natural soils in the A2 Horizon at depths exceeding 1.1m-3m. This assessment was supported by earlier geotechnical investigations that confirmed the presence of a heavily truncated sand dune system overlaid by historical fill deposits to a minimum depth of 1.1m-3m. Further, previous excavations within the study area confirmed the existence of a thick, historical fill deposit layer overlying the natural sand body characteristic of the Tuggerah soil profile. The assessment noted two registered Aboriginal sites within the vicinity of the subject area found within similar deposits as the subject area, noting the potential for Aboriginal objects to remain in-situ despite the historic modification of the landscape. The visual inspection observed moderate to high degree of disturbance across the study area, however, did not observe any clear expression of Aboriginal cultural relics during this inspection. This investigation recommended that a staged archaeological excavation program be undertaken to determine the archaeological potential of the subject area.

**Coast (2019)** undertook an archaeological investigation of Building B22 within the University of New South Wales Kensington Campus, approximately 150 m north of the present subject area. The archaeological investigation consisted of a desktop assessment and site survey. The desktop assessment did not identify any known Aboriginal objects within the study area. In formulating an assessment of the likelihood of unknown Aboriginal objects being retained, the results of an earlier geotechnical assessment were considered. That assessment found that the soil profile in the study area comprised a truncated layer of sand (A-horizon) overlaying sandstone to depths of between 1.5 to 3 m. Noting that Aboriginal sites in the broader area had been found in similar deposits, the desktop assessment concluded that there was potential for Aboriginal archaeological resources to be retained as subsurface deposits within the study area. However, noting the highly developed nature of the study area, the survey found no evidence of exposed natural ground or surface expressions of Aboriginal cultural material. The report recommended an archaeological excavation program be undertaken to further investigate the possibility of Aboriginal archaeological remains being retained in the study area as subsurface deposits.

**Urbis (2019)** undertook an Aboriginal archaeological investigation of Randwick Racecourse, Leger Lawn, Randwick NSW approximately 1.3km north of the present subject area. The archaeological investigation consisted of a desktop assessment and visual inspection. The archaeological investigation did not identify any known Aboriginal objects or Aboriginal places within the subject area. A geotechnical investigation of the subject area confirmed the presence of an intact sandy soil profile underlying 1.3m of imported fill throughout the site, with soils extending to a depth of 18m. However, previous historical land use activities including demolition, may have resulted in the disturbance in the level of the water table, which had the potential to impact the integrity of any archaeological remains that may have been retained. Further, noting the archaeological sensitivity of the subject area within a consolidated aeolian sand body, the investigation concluded that the subject area held potential for the retention of Aboriginal objects. It was therefore recommended that archaeological monitoring and a staged excavation program be undertaken to establish the presence or absence of Aboriginal objects within the study area.

**Coast (2018)** undertook an Aboriginal archaeological investigation of Building D14, University of NSW Kensington Campus, approximately 300m west of the present subject area. The archaeological investigation was limited to a brief desktop assessment. The desktop assessment did not identify any known Aboriginal objects or Aboriginal places within the subject area. The investigation identified the eastern portion of the study area as comprising a natural sandy dune layer approximately 3m-15m in thickness, overlaying a layer of

bedrock. Further, the western portion of the study area was found to encompass the swampy flats of the Lachlan Swamp catchment. Due to the archaeological sensitivity of the dune system and the Lachlan swamp catchment, the study area was found to possess archaeological potential within these sections of the site. A program of monitoring was recommended during construction works to ensure the appropriate management of archaeological finds.

**Mary Dallas Consulting (2018)** undertook an Aboriginal Cultural Heritage Assessment of the parcel of land immediately to the east of the present subject area, bounded by Botany Street, High Street, Hospital Street and Magill Street. The archaeological component of the study was limited to a desktop assessment. The desktop assessment did not identify any known Aboriginal objects within the study area. However, the assessment considered it possible that Aboriginal archaeological deposits could remain in partially truncated A2-horizons of the natural Tuggerah soil. Mapping undertaken as part of the desktop assessment located the study area within and on the margins of the Bird's Gully swamp. Consequently, the study area was considered to be of high archaeological sensitivity for its potential to contain subsurface archaeological material associated with utilisation of the swamp. It was therefore recommended that prior to the commencement of demolition or earthworks within the subject land a limited archaeological excavation program be undertaken followed by archaeological monitoring of the removal of all-natural soil profiles. Although not included in the report, subsequent excavation uncovered a hearth, registered as AHIMS ID# 45-6-3727.

**GML (2017)** undertook an Aboriginal archaeological investigation of 4-18 Doncaster Avenue, Kensington NSW, approximately 1.3km northwest of the present subject area. The archaeological investigation consisted of a desktop assessment and visual inspection. The subject area was found to contain one PAD (AHIMS ID#45-6-3245) and one registered Aboriginal object (AHIMS ID# 45-6-3246). The retention of Aboriginal relics within the subject area was found to increase the likelihood of further Aboriginal objects within the vicinity of the registered PAD. Spatial mapping undertaken as part of the desktop assessment indicates the location of the study area as being within the Lachlan Swamp catchment, a region likely subject to intensified Aboriginal land use and of high archaeological sensitivity. Earlier geotechnical investigations indicate that the study area is composed of up to 1m-2m of historical fill deposits at the southern end with sand and silty sand deposits extending to depths of at least 15m across the entire site. Previous archaeological programs within the study area identified the instability of the dune sands within the B-Horizon at a depth of 2m. The investigation concluded that at least 10m of the upper soil profile should be regarded as archaeologically viable. It was therefore recommended that a program of salvage excavation and archaeological monitoring to be undertaken to conserve both the PAD and registered Aboriginal object.

**Mary Dallas Consulting (2012)** undertook an Aboriginal archaeological investigation of the Prince of Wales Hospital, Corner of Avoca Street and High Street, Randwick NSW, approximately 500m east of the present subject area. The archaeological investigation consisted of a desktop assessment and visual inspection of the study area. The archaeological investigation did not identify any known Aboriginal objects or Aboriginal places within the subject area. The assessment identified that although the study area was in proximity to archaeologically sensitive aeolian sand deposits that no deposits were present within the site. Geotechnical investigation found that historical fill deposits of 0.5m or more were likely to be truncated by original fill deposits or directly overlay sandstone bedrock in the absence of original soil deposits. The shallow nature of soil deposits within the subject area contributed to the finding that there was a low likelihood of intact original soils across the A and B Horizon. The investigation concluded that there was low archaeological potential across the entire subject area. No further Aboriginal archaeological investigations were recommended.

**Mary Dallas Consulting (2011)** undertook an Aboriginal archaeological investigation of the 'Newmarket Complex', located approximately 300 m southeast of the present subject area and immediately south of Barker Street, Randwick. The archaeological investigation consisted of a desktop assessment and site survey. Mapping undertaken as part of the desktop assessment located the study area within and on the margins of the Bird's Gully swamp. Owing to the likely importance of this swamp to Aboriginal people, the desktop assessment determined that there was a likelihood that Aboriginal occupation remains would be retained in the least disturbed parts of the study area where the natural A-horizon of the original dune system may remain. Areas of sensitivity were registered as a PAD (AHIMS ID# 45-6-3342). A program of archaeological test excavation and archaeological monitoring were recommended for any future development within the study area.

**AHMS (2010)** undertook an archaeological investigation of the Randwick Racecourse Stables Precinct, approximately 800m northwest of the present subject area. The archaeological investigation was limited to a desktop assessment. The archaeological investigation did not identify any known Aboriginal objects or Aboriginal places within the subject area. The assessment identified an area of high archaeological sensitivity in the northeastern section of the study area, whilst the remainder of the subject site was identified as possessing low archaeological potential. Any archaeological material present would be in the form of sub-

surface deposits associated with open artefact sites and/or evidence associated with the sand dune system. No geotechnical testing was undertaken as part of this investigation. A program of archaeological excavation was recommended for the portion of the site containing high archaeological sensitivity to determine the nature of archaeological potential.

**Mary Dallas Consulting (2008)** undertook an Aboriginal archaeological investigation of the Prince of Wales Hospital Neuroscience Research Precinct, Randwick NSW, approximately 400m southeast of the present subject area. The archaeological investigation consisted of a desktop assessment and visual inspection. The archaeological investigation did not identify any known Aboriginal objects or Aboriginal places within the subject area. The investigation identified that parts of the study area were located within an area of Aboriginal Archaeological Sensitivity, due to its location on a remnant dune system. Geotechnical investigations confirmed areas of sensitivity as the presence of remnant sections of the dune profile in the A2 Horizon overlaying an intact B1 Horizon. The absence of sensitivity was defined by the total truncation of the upper dune profile into the underlying coffee rock. Archaeological evidence was likely to be restricted to stone artefacts and remnants of hearths. A program of archaeological excavation was recommended to be undertaken within the defined area of Archaeological sensitivity.

**Austral & Godden Mackay (1995)** undertook an archaeological excavation at the site of the Destitute Children's Asylum Cemetery, within the Prince of Wales Hospital, Randwick. The study area is located approximately 150 m northeast of the present subject area on the opposite side of Botany Street. The excavation was undertaken to recover all grave goods and human skeletal remains within the area of the cemetery. During mechanical excavation, an Aboriginal hearth was found. Radiocarbon dating of charcoal recovered from a hearth stone and thermoluminescence date from an actual hearth stone provided an estimated date of around 8,000 BP. Analysis of the fats on a hearth stone indicated that the hearth was used to cook aquatic protein, possibly freshwater fish. An absence of associated shell and fishbone was attributed to poor preservation conditions in the acidic dune landscape context. The hearth was registered as AHIMS ID# 45-6-2495.

### 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 area 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.

As previously noted by Coast (2019, p. 37), there is insufficient archaeological data to allow development of a region-specific predictive model for the local area. A review of other investigations in the area found that the general model of the Due Diligence Code outlined above is typically applied.

## 3.2. ENVIRONMENTAL CONTEXT

The environment context of the subject area 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 area.

### 3.2.1. Natural Landscape

The purpose of reviewing the natural landscape of the subject area is twofold. It assists in the prediction of the intensity and nature of Aboriginal land use and deposition of archaeological material in the subject area 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 area is located on a gently sloping, lower side-slope of a north-south aligned ridge (Figure 5).

**Soils and Geology:** The NSW Soil and Land Information System (SALIS) indicates that the subject area is located mostly within the Newport soil landscape, with south-eastern corner being located in the Tuggerah soil landscape (Figure 6). The Newport soil landscape is characterised by shallow aeolian (windblown) sands on gently undulating plains to rolling rises. The soil A-horizon typically comprises up to 20 cm of loose dark brown loamy sand to sandy loam (A1) overlying up to 50 cm of bleached loose sand on lower (A2) on lower side-slopes. The Tuggerah soil landscape is characterised by gently undulating to rolling coastal dune-fields of deep aeolian sands. The soil A-horizon typically comprises around 30 cm of loose, speckled, grey-brown loamy sand (A1) overlying more than 100 cm of bleached loose sand (A2). The underlying geology of both soil landscapes is Hawkesbury Sandstone, outcrops of which may occur.

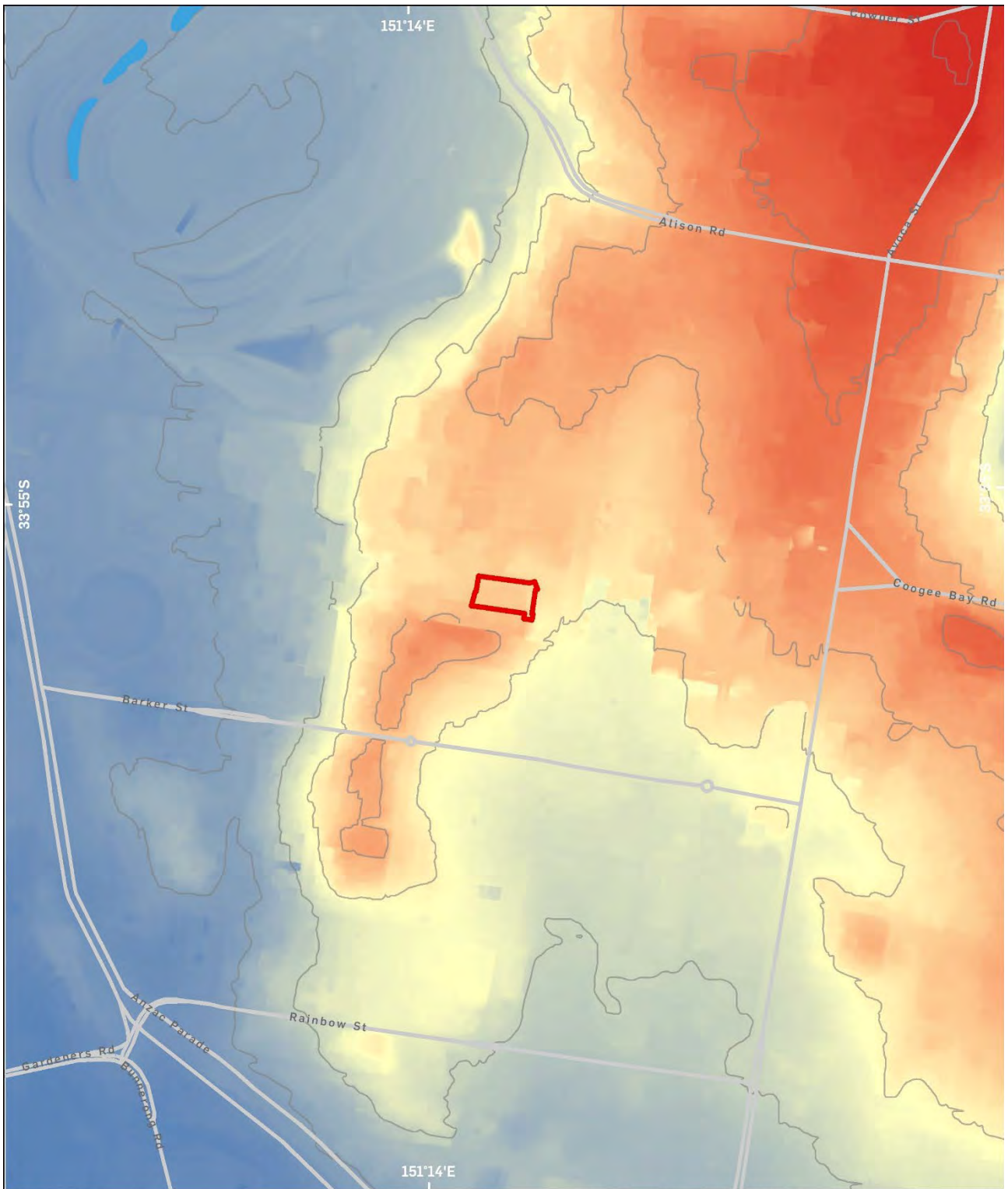
A geotechnical investigation undertaken by Douglas Partners (2024) confirms the presence of natural sand between a layer of fill and sandstone bedrock. Of 14 boreholes tested within the subject area, natural sand was encountered in all but one (BH7). The sand layer commenced at depths of between 1.3 and 2.2 m below the existing ground surface and ranged in thickness from 0.2 to 1.1 m. The findings of the geotechnical investigations are consistent with the location of the subject area in a transitional between the Tuggerah and Newport soil landscapes.

**Geomorphic Activity:** The mode of geomorphic activity in the subject area is aggradation. The Newport and Tuggerah soil landscapes have been formed by the natural deposition of the sands transported by wind. This process promotes accumulation of archaeological material in stratified deposits.

**Vegetation:** The natural vegetation of the Newport soil landscape is typified by low open-woodland, scrub and open heathland, while the Tuggerah soil landscape is characterised by dry sclerophyll tall open-woodland or forest. In both soil landscapes, smooth-barked apple (*Angophora costata*) and old man banksia (*Banksia aemula*) would have dominated, along with Sydney peppermint (*Eucalyptus piperita*) in the Tuggerah soil landscape and coastal banksia (*B. integrifolia*) and red bloodwood (*E. gummifera*) in the Newport soil landscape. Cultural markings may occur on a wide variety of tree species, including those likely to have been present in the Newport and Tuggerah soil landscapes.

**Hydrology:** The subject area was formerly located within a system of swamps extending across much of the coastal area between Centennial Park and Botany Bay, most of which have now been reclaimed. The nearest swamp to the subject area was located on the opposite side of Botany Road, less than 100m from the eastern boundary of the subject area (Figure 7). The former 'Bird's Gully swamp' sat in a depression bounded on the west by the ridge on which the subject area is located.

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.



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap. Helping shape our cities, one map at a time. Aug 2024



Project No: P0054776  
Project Manager: Aaron Olsen

**TOPOGRAPHY**  
UNSW G25 Development  
UNSW

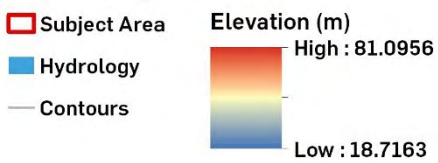
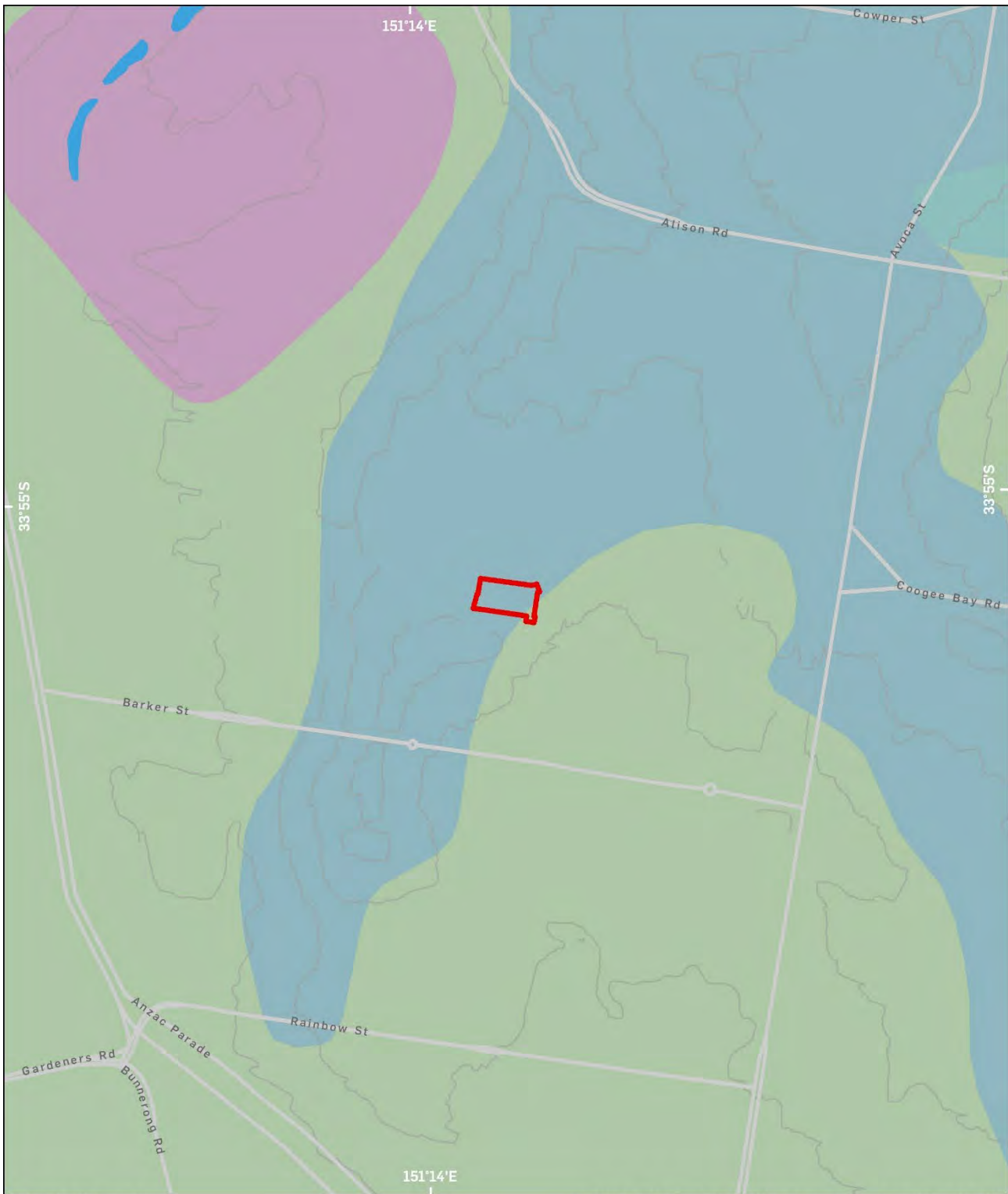


Figure 5 – Topography



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap. Helping shape our cities, one map at a time. Aug 2024



**SOIL LANDSCAPES AND HYDROLOGY**  
UNSW G25 Development  
UNSW

Project No: P0054776

Project Manager: Aaron Olsen

- ▭ Subject Area
- ▭ DISTURBED TERRAIN (Disturbed Terrain)
- ▭ NEWPORT (Aeolian)
- ▭ HAWKESBURY (Colluvial)
- ▭ TUGGERAH (Aeolian)
- ▭ Hydrology
- ▭ Hydrology 200m Buffer
- Contours

Figure 6 – Soil landscapes and hydrology



Figure 7 – Detail of “Plan Shewing Present Water Supply and Proposed Improvements, 1869”, indicating the location of the subject area (in red) in relation to the nearby swamp east of Botany Road  
 Source: *City of Sydney Archives, ID: A-01187732*

### 3.2.2. Historical Ground Disturbance

Disturbance to the natural landscape, either through human activity (e.g., clearing of vegetation, ploughing and construction of buildings) or natural processes (e.g., erosion), 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 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 is only 30 cm deep, but only moderate if the topsoil is 1 m deep.

Likely owing to the landscape of dunes and swamps that characterised the region, the subject area and surrounds were not included any early land grants. The subject area was included in a 47-acre parcel of land dedicated as a reserve for the Benevolent Asylum in 1864 (Figure 8). It appears the Benevolent Asylum made little use of the reserve and, in 1903, it was combined with an existing public park adjoining the northern and western boundaries of the reserve, which was rededicated as 'Randwick Park' (Figure 9).

The University of NSW acquired the subject area in the middle of the 20<sup>th</sup> century as part of its Kensington campus. An aerial image of the subject area from 1961 shows a vacant lot with some low vegetation and exposed sand in places (Figure 11). By 1971, the western portion of the subject area was being used as a carpark (Figure 12). No paving is evident, suggesting sand may have been capped loose material (e.g. soil or gravel). By 1978 the subject area was paved (Figure 13).

The following three decades saw little development of the subject area. However, in 2010, a portion of the subject area on the western boundary was impacted by ground disturbing works associated with the construction of the adjacent Solar Industrial Research Facility (G23) building. It is also apparent that the larger part of the subject area to the east had been landscaped by this time, with lighting also installed.

Based on the above, historical ground disturbing activities within the subject area have included land clearance, installation of hardstand and installation of underground services and earthworks localised along the western boundary. The earthworks are likely to have caused a high level of ground disturbance in the moderately deep (up to about 70 cm) A-horizon soils of the Newport soil landscape. The activities in the remainder of the subject area are likely to have caused a moderate degree of disturbance, removing or disturbing the upper portion of the soil A-horizon but leaving the lower portion intact. The assessed ground disturbance for the present subject area is mapped in Figure 14.

The results of the geotechnical investigation undertaken by Douglas Partners (2024) support the above assessment (Appendix E). Borehole BH7, which is located in the portion of the subject area on the western boundary that is identified as having been impacted by earthworks, found no evidence of natural soils (fill was found directly overlaying bedrock). In all other boreholes, a layer of natural sand of between .0.2 and 1.1 m thick was found between the fill layer and the sandstone bedrock, consistent with the assessment of moderate ground disturbance.

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.

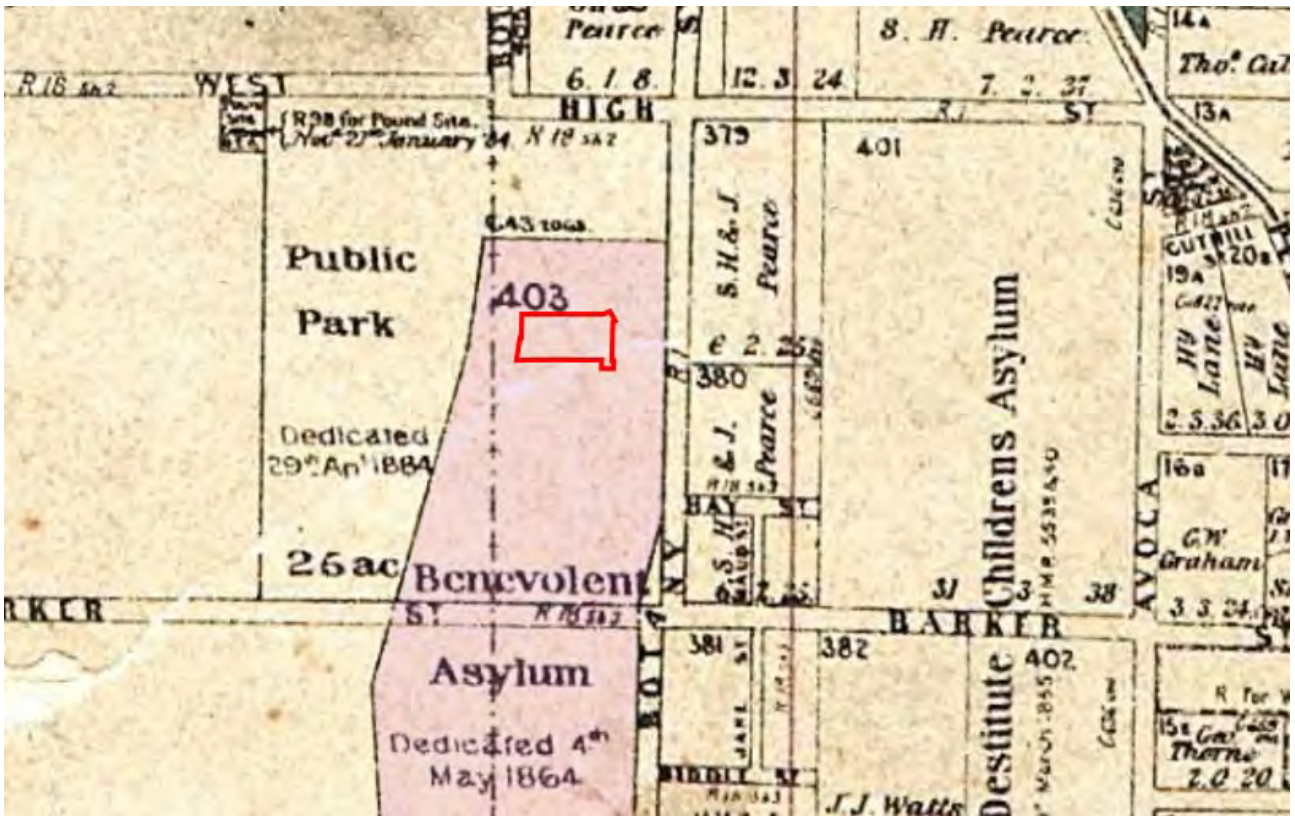


Figure 8 – Detail of map of the ‘Parish of Alexandria’ from 1900 showing the location of the subject area (red outline) within the Benevolent Asylum reserve (shaded pink)  
 Source: NSW Government, Historical Land Records Viewer

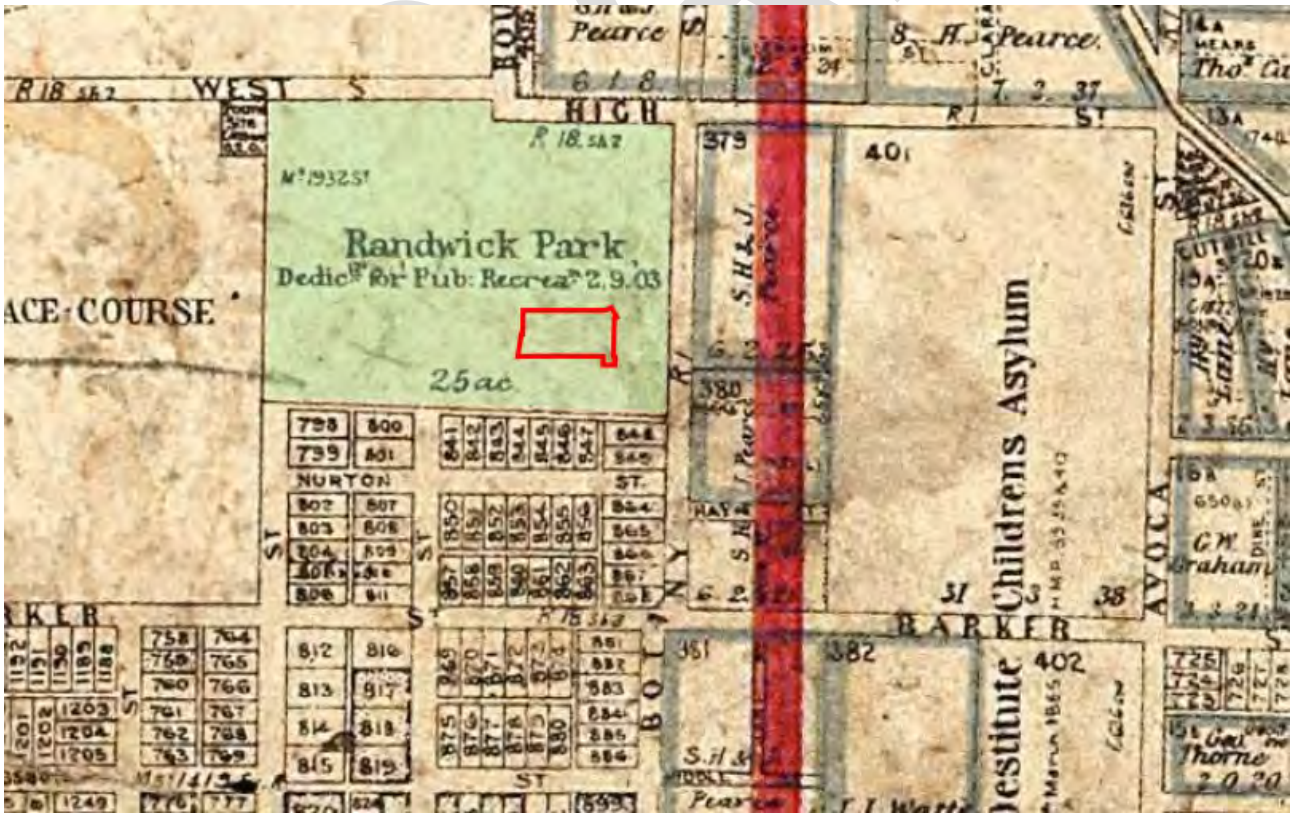


Figure 9 – Detail of map of the ‘Parish of Alexandria’ from 1913 showing the location of the subject area (red outline) located within ‘Randwick Park’ (shaded green)  
 Source: NSW Government, Historical Land Records Viewer

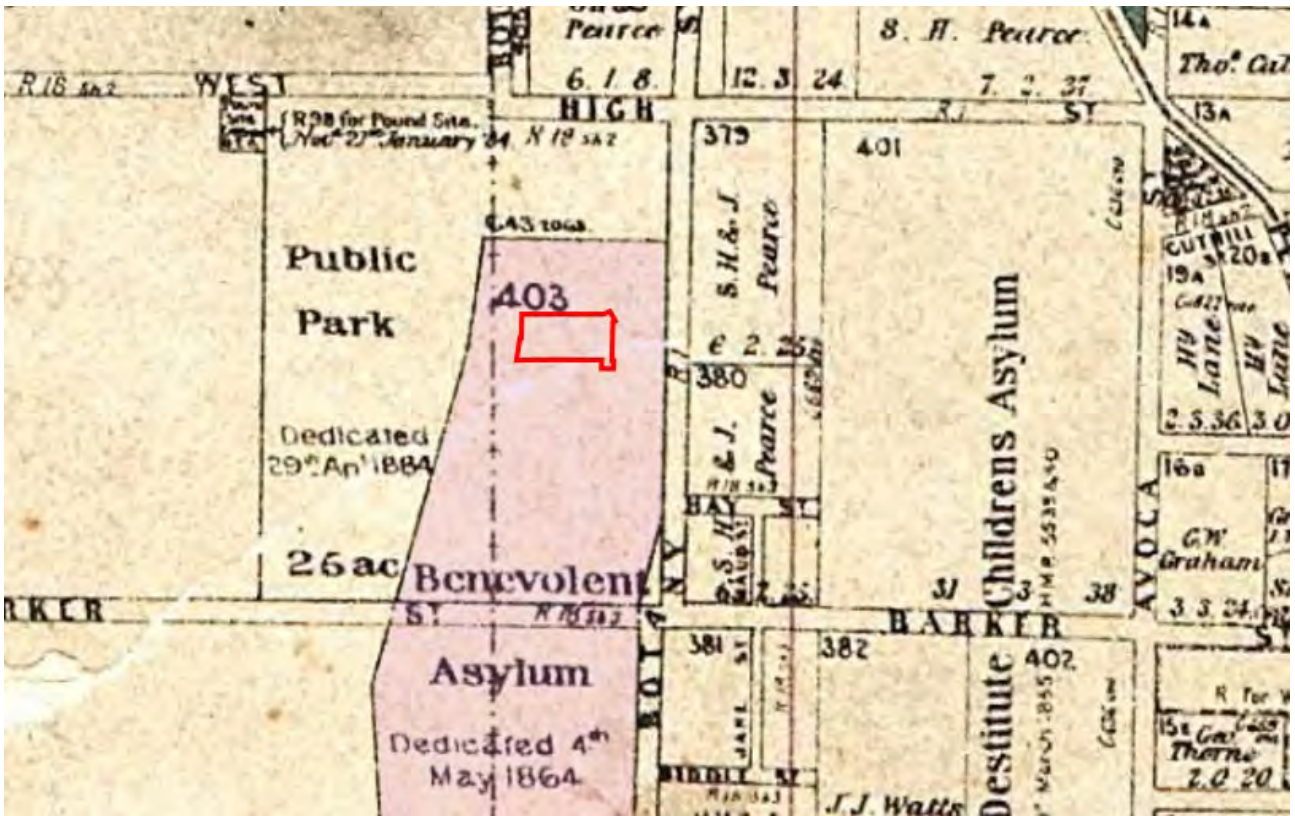


Figure 8 – Detail of map of the ‘Parish of Alexandria’ from 1900 showing the location of the subject area (red outline) within the Benevolent Asylum reserve (shaded pink)  
 Source: NSW Government, Historical Land Records Viewer

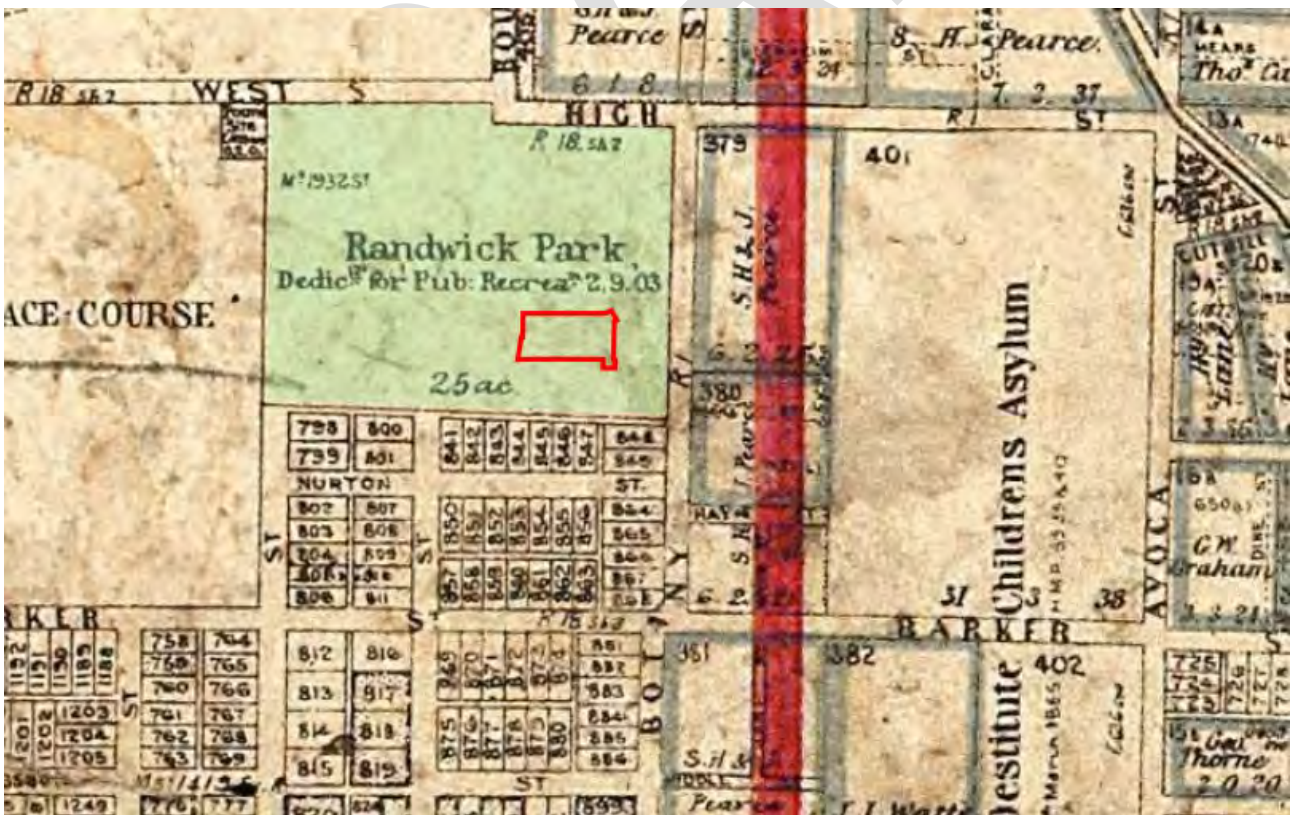


Figure 9 – Detail of map of the ‘Parish of Alexandria’ from 1913 showing the location of the subject area (red outline) located within ‘Randwick Park’ (shaded green)  
 Source: NSW Government, Historical Land Records Viewer



Figure 10 – Aerial image of subject area (red outline), 1961  
Source: NSW Government, Historical Imagery Viewer



Figure 11 – Aerial image of subject area (red outline), 1971  
Source: NSW Government, Historical Imagery Viewer

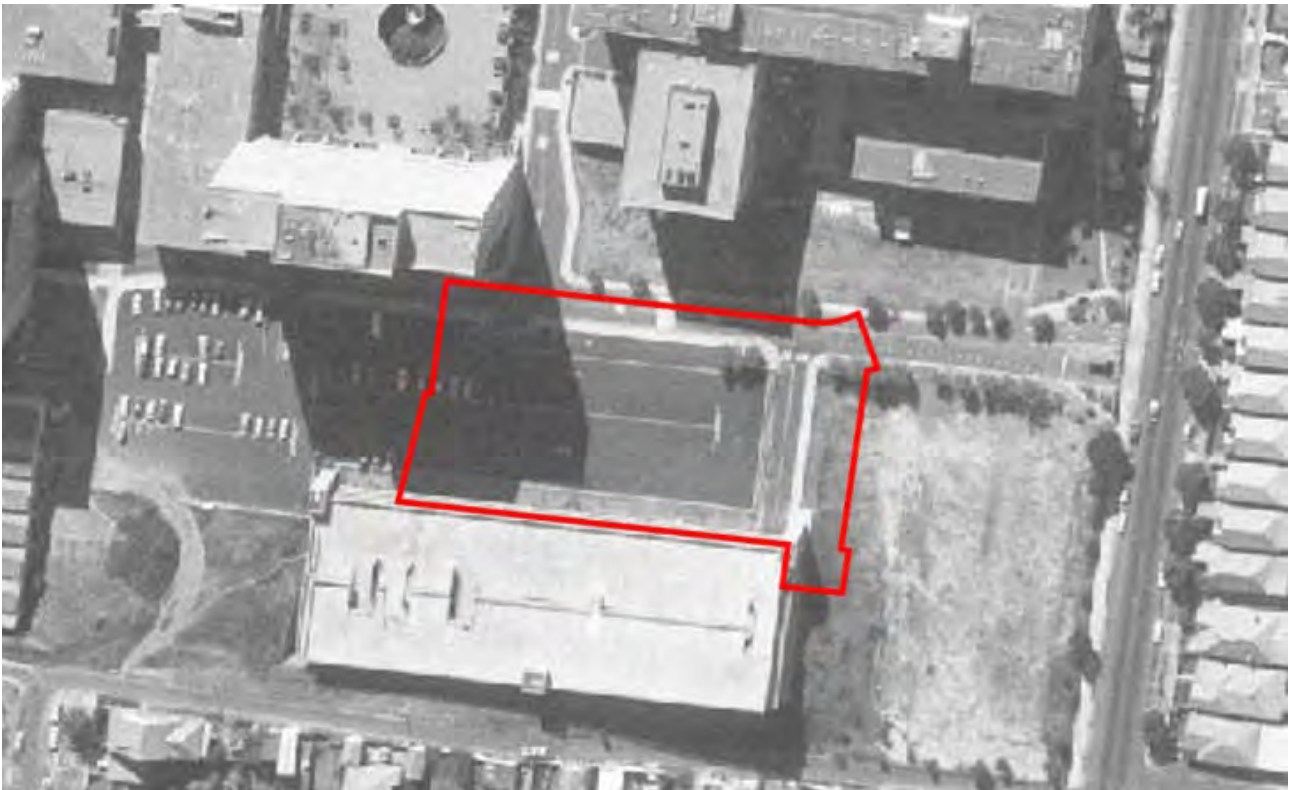


Figure 12 – Aerial image of subject area (red outline), 1978  
Source: NSW Government, Historical Imagery Viewer



Figure 13 – Aerial image of subject area (red outline), 2010  
Source: NSW Government, Historical Imagery Viewer



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap, Nearmap. Helping shape our cities, one map at a time. Aug 2024



Project No: P0054776  
Project Manager: Aaron Olsen

## HISTORICAL GROUND DISTURBANCE

UNSW G25 Development  
UNSW

Subject Area  
  Contours  
  Moderate Disturbance  
  High Disturbance

Figure 14 – Historical ground disturbance



Figure 7 – Detail of “Plan Shewing Present Water Supply and Proposed Improvements, 1869”, indicating the location of the subject area (in red) in relation to the nearby swamp east of Botany Road  
Source: *City of Sydney Archives, ID: A-01187732*

### 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 and ethnographic evidence indicates that Aboriginal land use in the local area and region was heavily reliant on water, particularly the resources provided by the swamps that covered much of the lower-lying areas of the coastal dune systems. Evidence of inhabitation, such as discarded artefacts and hearths, are likely to occur in association with these former swamplands. The ocean was also an important provider of resources. Rock exposures that occur near the coastline providing a substrate for art and grinding grooves and aiding the preservation of other deposits and shelter for inhabitation, evidenced by floor deposits of shell and artefacts.

### 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 and the local and regional character summarised above (Section 3.3).

The landscape features are considered relevant for indicating likely past Aboriginal land use in the region are those indicated in The Due Diligence Code.

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.

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:

- Artefacts are expected to be found in association with all sensitive landscape features
- Hearths are expected to be found in association with higher ground at the margins of swamps
- Shell middens are expected to be found in association with water
- Art and grinding grooves are expected to be found in association with rock exposures near water

The predictive model described above is applied in the following section to determine the Aboriginal archaeological potential of the subject area 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 area is assessed as follows.

The entire subject area is located within a sand dune system (the Newport and Tuggerah soil landscapes) and within 200 m of water (part of a now-reclaimed swamp system on the opposite side of Botany Road (Section

3.2.1), both of which are considered indicative of likely past Aboriginal land use under the predictive model presented in the preceding section. Based on known associations between Aboriginal sites and landscape features in the region and the types of Aboriginal site features in the immediate vicinity of the subject area, that land use is most likely to be materially manifested as low-density subsurface deposits of discarded stone artefacts and subsurface hearths.

Natural aggradation through aeolian transport of sand within the subject area is likely to have promoted accumulation of any deposited archaeological material. However, subsequent human activity, including land clearance, construction and demolition of buildings, installation of services and landscaping, would have disturbed or removed at least part of the natural soil A-horizon in which archaeological material is typically found.

Historical ground disturbance across most of the subject area is moderate, where a geotechnical investigation confirms the presence of a natural A-horizon (possibly truncated). A small portion of the subject area on the western boundary has been subjected to a high level of historical ground disturbance due to earthworks in 2010 associated with the construction of the adjacent G23 building.

Synthesising the above factors according to the archaeological rating scheme presented in the preceding section, it is determined that there is **High** potential for Aboriginal archaeological remains to be retained across the majority of the subject area, although in the area of high disturbance on the western boundary there is **Very Low** potential. The assessment of Aboriginal archaeological potential is mapped in Figure 15.

Likely Aboriginal site features to be retained within the subject area are artefacts and hearths based on the location of the subject area in a sand dune system near Bird's Gully swamp.

### 3.5. SUMMARY

The desktop assessment of the subject area 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 area.
- The entire subject area is located within a sand dune system (the Newport and Tuggerah soil landscapes) and within 200 m of water (part of a now-reclaimed swamp system on the opposite side of Botany Road), both of which are considered indicative of likely past Aboriginal land use.
- Natural aggradation through transportation of sands by wind is likely to have promoted retention of archaeological resources within the subject area.
- As confirmed by a geotechnical investigation (Douglas Partners 2024), historical ground disturbance is assessed to be moderate across most of the subject area (natural A-horizon sands of 0.2 to 1.1 thick below a depth of about 1.0 to 1.6 m), the exception being a portion on the western boundary having been subjected to high ground disturbance (no natural A-horizon).
- Applying the predictive model, the Aboriginal archaeological potential of the subject area is assessed to be **High** across most of the subject area, but **Very Low** in the highly disturbed area on the western boundary.



GDA 1994 MGA Zone 56

© 2024. Data: ABS, OpenStreetMap, Nearmap. Helping shape our cities, one map at a time. Aug 2024



Project No: P0054776  
Project Manager: Aaron Olsen

**ARCHAEOLOGICAL POTENTIAL**  
UNSW G25 Development  
UNSW

Subject Area     Contours     High Potential     Very Low Potential

Figure 15 – Aboriginal archaeological potential

## 4. VISUAL INSPECTION

A 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 of the subject area was undertaken on 30 September 2024 by Ali Byrne (Urbis Associate Director, Archaeology) and Korri Currell (Kamilaroi Yankuntjatjara Working Group). Also present was Siobhan Hargroves (Development Manager, UNSW).

The visual inspection was undertaken in sunny conditions. Ground Surface Visibility (GSV) was estimated to be 0% across the subject area being covered by hardstand, and vegetation in landscaped garden beds.

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

The visual inspection confirmed historical ground disturbance across the entire subject area. The entirety of the subject area has been impacted by the establishment of the current carpark, in addition to existing underground services. No observable mature native trees were observed on the site. It is evident from inspection that the subject area has been modified by historical activities, with at least the upper portion of the soil A-horizon having been disturbed.

While no Aboriginal objects were identified, the presence of deep sandy soils within the site was discussed with the site team and confirmed that there was likely to be some potential for Aboriginal objects to be present at greater depths (>1m) below the surface. The RAPs in attendance were in agreement with this assessment.



Figure 15 – View west showing the ground level vs car park level, indicating presence of fill to create carpark space



Figure 16 – View west within carpark demonstrating 0% visibility



Figure 17 – Entry to carpark, facing north



Figure 18 – Landscape garden beds along southern boundary of site



Figure 19 – View east / northeast towards Prince of Wales Hospital, from carpark



Figure 20 – Accessible entry to carpark from footpath, and landscaped garden beds

DRAFT

## 5. SIGNIFICANCE ASSESSMENT

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

Assessment of each 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 area) exists, what is already conserved, how much connectivity is there?*
- Rarity: *is the subject area important in demonstrating a distinctive way of life, custom, process, land-use, function or design no longer practised? Is it in danger of being lost or of exceptional interest?*
- Education potential: *does the subject area contain teaching sites or sites that might have teaching potential?*

The Aboriginal heritage significance of the subject area 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 area 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.

No written comments were received in relation to the significance of the subject area during Stages 2 and 3 of the consultation process. However, La Perouse Local Aboriginal Land Council ('LPLALC') has previously provided comments in relation to the area immediately south of the present subject area (Urbis 2024). Specifically, LPLALC noted that the broader area is significant for its close proximity to former swamplands and as a likely campsite for Aboriginal people before the development of the subject area, noting the discovery of hearths in the adjacent Prince of Wales Hospital grounds. As noted in Sections 3.1.1 and 3.1.3.1, one of those hearths have been dated to around 8,400 BP and is one of the earliest dated sites on Sydney coastal fringe.

In view of the foregoing comments and the proximity of known camping sites, the closest being approximately 175 m to the northeast, it is clear that the subject area does have social and cultural value to the local Aboriginal community as a known camping place dating at least to the early Holocene.

**[TO BE UPDATED IN VIEW OF RAP COMMENTS AFTER STAGE 4]**

### **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 area 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.

No known Aboriginal objects have been identified within the subject that would likely yield information that contributes to an understanding of the cultural or natural history of the local area or region. However, the majority of the subject area has been assessed as having high potential for retaining as yet unknown Aboriginal objects. As has been demonstrated in nearby sites, Aboriginal objects may be well-preserved for thousands of years. Any deposits relating to the early Holocene (8,000 - 11,700 BP) or Pleistocene (>11,000 BP) would have scientific value owing to the rareness of archaeological resources from these periods.

On the basis that there is high potential for archaeological resources to be retained within the subject area, the subject area is provisionally assessed as having scientific value. Should any Aboriginal objects be identified within the subject area during the proposed works, the scientific (archaeological) value of those objects should be assessed.

### **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 natural form of the subject area has been altered through land clearance, construction of on-grade carparking, installation of services and landscaping. The present visual appearance and other sensory aspects of the subject area are unlikely to resemble those of the landscape of the local area as it existed prior to European contact. The subject area 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 area that could be assessed for aesthetic value. In the event that any Aboriginal objects are identified within the subject area during the proposed works, these should be assessed for aesthetic value.

### 5.3. STATEMENT OF SIGNIFICANCE

The subject area has moderate social and cultural significance to the local Aboriginal community for its proximity to the nearby Bird's Gully swamp and associated camping sites dating to at least the early Holocene. Owing to the proximity of both the swampland and identified hearth sites to the present subject area, it is likely that surrounding area formed a single cultural landscape characterised by utilisation of swampland resources and nearby camping on higher ground. The assessment of significance is reduced due to the absence of any known Aboriginal sites or evidence of a specific cultural association with the subject area itself and due to historical ground disturbance.

The assessment of significance should be updated in the event that any Aboriginal objects are found within the subject area during further archaeological investigation or during the proposed works.

**[TO BE UPDATED IN VIEW OF RAP COMMENTS AFTER STAGE 4]**

DRAFT

## 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 area 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 area.

The desktop assessment and site inspection identified no known Aboriginal objects within the subject area. However, the majority of the subject area has been assessed as having high Aboriginal archaeological potential.

The proposed activity includes demolition of the existing at-grade car park, construction of a multi-storey building with basement and associated landscaping, parking and public domain works. The proposed works will cause ground disturbance to depths exceeding the known depth of the surface fill layer and will be undertaken in areas where residual natural soils are known to occur, there is a high likelihood that they will cause 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 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 no known Aboriginal objects within the site, the present impacts to intergenerational equity would be considered nil. However, further archaeological investigation is required in order to determine whether Aboriginal objects are present beneath the surface layer of fill material.

### **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 area 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.

Further archaeological investigation is recommended to be undertaken prior to the proposed works as a harm minimisation strategy. The further archaeological investigation should comprise a subsurface Aboriginal archaeological excavation program undertaken in accordance with the Archaeological Research Design and Excavation Methodology detailed in Section 7 of this report. The subsurface excavation program should be undertaken with the participation of nominated Aboriginal RAPs and appropriately qualified archaeologists. To avoid unnecessary harm to Aboriginal objects and existing improvements and to avoid unnecessary disruption of UNSW operations, it is recommended that the subsurface excavation be undertaken after approval of SSD-74670005.

A post-excavation report should be prepared after completion of the subsurface excavation program that presents the findings excavation, provides a reassessment of the significance of the subject area and sets out further management recommendations to mitigate harm to any identified Aboriginal objects.

# 7. RESEARCH DESIGN & EXCAVATION METHODOLOGY

The Aboriginal archaeological test excavation recommended in Section 6 should be undertaken in accordance with the research design and excavation methodology outlined below.

## 7.1. OBJECTIVES

The objectives of the archaeological test excavation would be to:

- Investigate the nature, spatial and stratigraphical extent, condition and integrity of any Aboriginal archaeological deposits that may be present within the subject area.
- If Aboriginal archaeological deposits are identified, apply relevant research questions to interpret the finds and results in context of local and regional archaeological modelling.
- To provide information for the Registered Aboriginal Parties (RAPs) on any archaeological resources identified by the excavation.
- To provide opportunity for the RAPs to participate in the works and provide feedback and cultural heritage information throughout the process.

## 7.2. RESEARCH DESIGN

The following research design was developed to provide a framework to investigate the nature and origin of the potential archaeological resource within the subject area, based on the findings of this ACHAR.

1. What is the spatial and vertical extent of the deposit?
2. What is the integrity and condition of the deposit? How has the deposit been impacted by historical land use?
3. What are the physical attributes and compositions of the deposit (e.g. stone artefacts, features, remains of the original environment)?
4. What are the characteristics of the stone artefact assemblage? What types of artefacts are present and what specialisation if any can be detected in the assemblage?
5. Does the archaeological deposit have evidence of intra-site patterning or various occupational periods?
6. Should faunal and/or shell material be located, what species present were utilised by Aboriginal people?
  - Can an inference be made as to a preference for marine or terrestrial resources?
  - Is there evidence of any change over time in these preferences or species utilised?
7. How does it relate to our understanding of the environment at the time and/or is it consistent with predictive models for the area.
8. Can the archaeological deposit be interpreted in a local context?
  - Are there similarities or differences with nearby archaeological sites?
  - Is there evidence of connection to nearby sites in terms of raw material, composition and nature of the assemblage?
9. Can the archaeological deposit be interpreted in the regional context?
  - Where did the raw materials originate from?
  - Is there any indication of trade in connection with raw material procurement?
  - How does the assemblage compare to other archaeological sites within the region?
10. Do the results of the archaeological excavation change the scientific and cultural significance of the site?

11. What is the scientific and cultural value of the assemblage?
12. How do the Aboriginal stakeholders view the cultural value of the deposit and assemblage?

## **7.3. ARCHAEOLOGICAL METHODOLOGY**

The methodology is informed by the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010) ('Code of Practice') and is tailored to the specific environmental conditions of the subject area. In particular, it addresses the challenges of excavating an area where the upper layers comprise contaminated fill exceeding depths of 2 m deep and the underlying sand deposit extending to depths exceeding 3 m.

In the event of any unforeseen circumstances, the methodology may need to be adjusted. All necessary adjustments will be discussed between the Excavation Director, Aboriginal site officer(s) and the Proponent.

### **7.3.1. Excavation Staging**

We propose to undertake the archaeological excavation in four stages:

- Stage 1 – Mechanical removal of existing concrete slab and fill material at the location of the proposed ground disturbing activities within the subject area (refer to Section 7.3.2.3)
- Stage 2 – Archaeological excavation utilising mechanical methods in 10 cm spits. If cultural material is recovered excavation will proceed to stage 3 (refer to Section 7.3.2.4).
- Stage 3 – Hand Excavation utilising standard archaeological excavation methods informed by the Code of Practice. Should archaeological deposits be recovered excavation pits will be expanded to ascertain the extent of the deposit and to salvage the cultural material (refer to Section 7.3.2.5).
- Stage 4 – Further Excavation: In the event that significant archaeological deposits are recovered across a wide area during the excavation program it may be deemed necessary to extend the excavation to further locations. The need to undertake further excavation will be assessed following completion of the initial excavation program.

Additional consultation with Heritage NSW and the RAPs may be necessary to refine and develop the excavation methodology for suitable management of archaeological resources.

### **7.3.2. Standard Excavation Practices**

#### **7.3.2.1. Sampling**

A sampling strategy must be developed to provide a framework for sampling all potential archaeological deposits (PAD) within the subject area that are at risk of harm and to describe the differentiation of the PAD to be test-excavated from the surrounding archaeological landscape (i.e. explain why the PAD is anticipated to be of higher significance than the continuous distribution of archaeological material in which it exists), and

- Test those areas of PAD that have no archaeological exposure or visibility, or
- Test the boundaries of known sites (where appropriate)
- Confirm areas of low potential (where relevant).
- Comply with the methods described in this Code
- Describe how the sampling area relates to the area that is proposed to be impacted by the proposed activity.

The sampling strategy must be documented in the Archaeological Report as set out in Requirement 11. This document (Section 7.3.2.3 to Section 7.3.2.5) outlines the proposed strategy.

#### **7.3.2.2. Notification**

At least 14 days before undertaking any test excavations, Heritage NSW must be notified, in writing, of the following:

- The location of the proposed test excavation and the subject area

- The name and contact details of the legal entity with overall responsibility for the project
- The name and contact details of the person who will be carrying out the test excavations where this is different to the legal entity with overall responsibility for the project
- The proposed date of commencement, and estimated date of completion, of the test excavations
- The location of the temporary storage location for any Aboriginal objects uncovered during the test excavations.

A copy of the sampling strategy for test excavation must also be provided.

### **7.3.2.3. Stage 1 Archaeological Monitoring**

As part of the demolition programme for the site, archaeological monitoring would be undertaken by the archaeologist and RAPs during the removal of fill levels. Monitoring would be undertaken in accordance with the below.

- All machinery should work backwards from a slab surface in order to avoid damage to any exposed archaeological relics.
- Mechanical excavation should be undertaken by a small tonnage machine, preferably 5-tonnes, with a flat edged (mud) bucket.
- Excavation will be undertaken as shallow scrapes to assist in the identification of fill deposits and natural soils. When natural soils are reached, mechanical excavation will switch to the Stage 2 methodology, below.
- The fill above intended test pit locations will be removed in 4x4m squares due to safety and access requirements should the test pit require benching.
- Where potential historical relics are uncovered, refer to Unexpected Finds Protocol.

### **7.3.2.4. Stage 2 Mechanical Excavation**

Following the removal of the concrete slab and imported fill the excavation will proceed observing the following protocols.

- Urbis archaeologists and RAPs will mark out a series 2 m x 1 m excavation trenches in the areas of proposed ground disturbing activities (Figure 3).
- Mechanical removal of 10 cm layers within 2 m x 1 m excavation trenches.
- Soil will be kept separate for each unit and sieved through 5mm nested mesh sieves. The method of dry or wet sieving will be discussed in line with the on-site environmental requirements and the moisture content of the sand.
- Mechanical excavation will continue with this method until archaeological material is recovered.
- Should archaeological material be recovered mechanical excavation will cease and excavation will proceed with hand tools in accordance with standard archaeological process.
- Excavation of each trench will continue until the water table is breached, bedrock is encountered, or it becomes unsafe to continue.
- If no archaeological material is found at depths at which safety becomes compromised a decision will be made on the next stage of excavation program. This will be subject to discussion with the Excavation Director and RAPs based upon site specific conditions such as safety, intactness of deposit and previous finds in other excavation trenches.

### **7.3.2.5. Stage 3 Manual Excavation**

Should archaeological material be recovered mechanical excavation will cease and excavation will proceed with hand tools in accordance with standard archaeological process. Excavation utilising only hand tools will be carried out in line with the following methodology.

- Hand excavation will be undertaken within the initial 2 m x 1 m trenches as separate 1 m x 1 m excavation pits in arbitrary 10 cm spits or by stratigraphy, whichever is smaller. Pits must be excavated by hand (inclusive of trowels, spades, and other hand tools).
- Should a concentration of greater than 10 Aboriginal objects be recovered, the 1 m x 1 m excavation pits will be further divided into quadrants of 50 cm x 50 cm for greater spatial resolution.
- The excavation of each pit must continue until:
  - 2 spits of culturally sterile natural deposit up to 1.5 metres have been excavated.
  - the water table is breached.
  - bedrock is encountered.
  - unsafe to continue excavating (noting that any excavation beyond 1.5 metres depth, as measured from the cleared natural surface level, must only be undertaken where safe to do so and with appropriate safety measures in place).
- Shoring or adequate benching of pits to ensure safe excavation at depth must be undertaken as necessary. The method of benching will be decided in discussion with a geotechnical engineer to be organised by the proponent and may require hand excavation of additional 1 m x 1 m adjoining pits so not disturb intact cultural deposits.
- If any of the following are identified in a single excavation pit, the excavation must be expanded via manual salvage of adjoining 1 m x 1 m excavation pit:
  - A significant number of artefacts per pit.
  - Instances of formal tools (i.e. backed artefacts, retouched artefacts, scrapers, axes) within a single excavation pit.
  - An intact knapping floor or cultural layers, including charcoal, a heat treatment pit, hearths, or culturally deposited shells.
  - Other features agreed by the Excavations Director and RAPs present onsite as being rare in a local and/or regional context and warranting further investigation and salvage.
  - The expansion of the pit should continue until the full extent of the feature or deposit has been identified, recorded and salvaged.
- All excavated soils will be sieved through 3mm or 5mm sieves on site, as detailed in Section 7.3.2 below.
- Any archaeological material, including stone artefacts, animal bone, shell, charcoal, or other foreign material be found during the excavation or sieving will be bagged and labelled with a unique number based on the relevant square and stratigraphic layer or unit.
- Standard archaeological recording including description of excavation pits and archaeological features and finds, photographic and section or plan drawings will be done where necessary during the excavation. Soil samples will also be taken for further analysis.
- GPS coordinates for each pit will be recorded if deemed necessary.
- The spatial extent of the archaeological excavation will not exceed the proposed impact footprint.
- Archaeological excavations must cease immediately if suspected human remains are encountered at any point during the excavations. The area of these suspected remains should be immediately secured, and the human remains procedure in Section 7.5.2 must be followed.

An amended version of this methodology may be utilised for Stage 4, if required.

### **7.3.2.6. Sieving**

All material excavated from the test excavation units must be either wet or dry sieved using a 5 mm aperture wire-mesh sieve. A 3 mm mesh should be used if substantial archaeological deposits are uncovered or if the size of artefacts encountered warrants a smaller mesh size.

### 7.3.2.7. Archaeological Recording

The archaeological excavations will be recorded using standard archaeological methods, including:

- Description of all excavation pits, archaeological features, contexts and soil profiles on pro-forma archaeological recording sheets.
- RTK or manual plotting of all excavation pits, in situ artefacts and cultural layers.
- Photographic recording of all units, archaeological features and artefacts found in-situ, with accompanying scale and descriptive signage.
- Photogrammetry recording should be considered for each pit for interpretation of the site geomorphology
- Section and plan drawings of selected excavation pits that show contextual change across the site and any encountered archaeological features.
- Aboriginal objects found will be bagged and tagged with a unique identification number corresponding to the excavation unit, depth/position found and additional details of the circumstances of the find should that be critical.

### 7.3.2.8. Artefact Analysis

Aboriginal objects that are recovered during the excavations may be analysed on-site and/or may be taken off-site for further analysis. Artefacts will be cleaned, measured and attributes recorded according to the relevant standards in line with the Code of Practice and guided by Holdaway and Stern (2004).

### 7.3.2.9. Care and Control

Any Aboriginal objects that are moved during test excavation must be reburied as soon as practicable in a secure temporary storage location in accordance with Requirement 26 pending any agreement reached as to the long-term management of the salvaged Aboriginal objects.

The person carrying out the test excavation is responsible for ensuring that procedures are put in place so that Aboriginal objects that are reburied are not harmed.

The location of the secure temporary storage location must be submitted to AHIMS with a site update record card for the site(s) in question.

All artefacts will be bagged, labelled and packaged according to the Australian Museum Artefact cataloguing standards.

All recovered archaeological material including stone artefacts, animal bone, shell, charcoal, or other foreign material will be bagged either individually or according to the excavation unit, labelled according to the unit and spit/context number. The artefacts then be placed into containers and temporarily retained by Urbis. Artefacts will be made available to ensure that Aboriginal site officers have the opportunity to inspect and share information in relation to the artefacts.

At the end of the archaeological excavation, artefacts will be temporarily retained by Urbis and placed into a lockable, secure place in Urbis' Sydney offices. Consultation with the registered Aboriginal Parties will be carried out in relation to the care and control of the recovered artefacts including the opportunity to carry out the cleaning and analysis of artefacts.

Further consultation with the RAPs is required to determine long term care and control of any Aboriginal objects excavated. Long term deposition of artefacts will be negotiated with the registered Aboriginal parties and a Care and Control Agreement will be drafted. We believe that the archaeological excavation program should be carried out first to understand the size, composition and context of the assemblage to aid the final decision.

Requirement 26 "Stone artefact deposition and storage" in the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* must be complied with.

### 7.3.2.10. Reporting

A Post Excavation Report must be prepared for the test excavation, describing the results from the investigations. The report must:

- Include a short summary of the report with a description of the site location.

- Describe any ongoing consultation with, or involvement of, representatives of RAPs in relation to the excavation.
- Provide a description of the methods of the excavation.
- Provide detailed mapping of the location of each of the excavation pits.
- Provide cross sections and photography of each pit detailing context and stratigraphy/ stratigraphic profile.
- Provide the results of the excavation including detailed soil analysis.
- Detail the count of Aboriginal objects within each excavation pit and each spit including recording those spits with nil Aboriginal objects.
- Include Artefact analysis undertaken and recorded for all recovered artefacts.
- Provide comment on concluding evidence regarding presence or absence of Aboriginal deposits or objects.
- Provide comment on the geomorphology of the site related to the results of the subsurface investigation.
- Aboriginal objects identified during the excavation program will be registered on the AHIMS data base. An Aboriginal Site Impact Recording Form will be submitted for newly impacted AHIMS sites.
- Comment on the effectiveness of any mitigation measures that were implemented
- Provide further recommendations for ongoing management of the archaeological resources
- If any Aboriginal objects were moved to a temporary storage location, a description of the nature and types of Aboriginal objects which are still at that location.
- Provide evidence of consultation undertaken with the RAPs for resolving long-term management of Aboriginal objects recovered
- Reassess the significance of the subject area in light of the results from the excavation program.
- Provide further recommendations for project in relations to the finds and construction.
- The report must be provided to RAPs once complete.
- Following RAP review, Heritage NSW will be provided with the report. Where additional excavation is required, the approach would need to be discussed and approved by Heritage NSW.

#### **7.3.2.11. Occupational Health and Safety**

The archaeological excavations will be carried out according to site-specific OH&S requirements and also in line with Urbis' internal OH&S policies. The excavation team will work under a specifically developed Safe Work Method Statement (SWMS) that will address the following:

- Description and risk assessment of day-to-day activities, including (but not limited to):
- Excavation of contaminated soil, including the presence of asbestos.
- Excavation of pits to specified maximum depth and the use of benching or shoring for stability if necessary.
- Liaise with geotechnical engineer for safe benching and/or shoring for excavation at depth.
- Working in the vicinity of heavy machinery, including mechanical excavators.
- Working in an outdoor environment.
- Recording of site attendance for the excavation team and visitors, including name, position, contact details, date of attendance and hours present.

#### **7.3.3. Excavation Team**

The Aboriginal archaeological test excavations should be undertaken by qualified archaeologists with the assistance of members of one or more of the Registered Aboriginal Parties.

## **7.4. POST-EXCAVATION**

In the event that extensive intact archaeological deposits are identified, salvage excavation may be required. A methodology for the completion of this will be prepared and approved by RAPs and Heritage NSW, prior to being completed.

## **7.5. UNEXPECTED FINDS PROCEDURES**

Where archaeological remains are uncovered or where archaeological investigations outlined in this report do not identify archaeological deposits and construction is advised to proceed, the below procedures must be incorporated into the Construction Environmental Management Plan.

### **7.5.1. Unexpected Finds Procedure: Archaeological Material**

In the event that any archaeological material is uncovered during any site works, the following steps must be carried out:

- (a) All works must halt in the immediate area of the find to prevent any further impacts to the archaeological material.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist and the Registered Aboriginal Parties for the ACHA must be contacted to determine the significance of the objects.
- (d) If determined to be an Aboriginal object, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided to AHIMS.
- (e) Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
- (f) The Applicant must consult with the Aboriginal community representatives, the archaeologist(s) and Heritage NSW to develop and implement management strategies for all Aboriginal objects.
- (g) Works may only recommence in the vicinity of the find with the approval of Heritage NSW.

### **7.5.2. Unexpected Finds Procedure: Human Remains**

In the event that any human remains are uncovered during any site works, the following steps must be carried out:

- (a) All works must cease immediately in that area and the NSW Police and Heritage NSW contacted.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains.
- (d) The Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the human remains.
- (e) Works shall only recommence with the approval of Heritage NSW.

## 8. 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 area.

- **Conclusion 2 – Sensitive Landscape Features**

The entire subject area is located within a sand dune system (the Newport soil landscape) and within 200 m of water (part of the now-reclaimed Bird's Gully swamp system on the opposite side of Botany Road), both of which are considered indicative of likely past Aboriginal land use.

- **Conclusion 3 – Historical Ground Disturbance**

As confirmed by a geotechnical investigation (Douglas Partners 2024), historical ground disturbance is assessed to be moderate across most of the subject area (natural A-horizon sands of 0.2 to 1.1 thick below a depth of about 1.0 to 1.6 m), the exception being a portion on the western boundary having been subjected to high ground disturbance (no natural A-horizon).

- **Conclusion 4 – Archaeological Potential**

Applying the predictive model, the Aboriginal archaeological potential of the subject area is assessed to be **High** across most of the subject area, but **Very Low** in the highly disturbed area on the western boundary.

- **Conclusion 5 – Significance Assessment**

The subject area has moderate social and cultural significance to the local Aboriginal community for its proximity to the nearby Bird's Gully swamp and associated camping sites dating to at least the early Holocene.

**[TO BE UPDATED IN VIEW OF RAP COMMENTS AFTER STAGE 4]**

- **Conclusion 6 – Impact Assessment**

As the proposed ground disturbing works encompass an area of high archaeological potential, the proposed development is likely to cause direct harm to Aboriginal objects.

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-74670005.

- **Recommendation 2 – Further Archaeological Investigation**

As the proposed works are likely to cause harm to Aboriginal objects, it is recommended that further archaeological investigation be undertaken at the commencement of the proposed works, prior to construction commencing. The further archaeological investigation should comprise a subsurface Aboriginal archaeological excavation program undertaken in accordance with the Archaeological Research Design and Excavation Methodology detailed in Section 7 of this report. The subsurface excavation program should be undertaken with the participation of nominated Aboriginal RAPs and appropriately qualified archaeologists. To avoid unnecessary harm to Aboriginal objects and existing improvements and to avoid unnecessary disruption of UNSW operations, it is recommended that the subsurface excavation be undertaken after approval of SSD-74670005.

A post-excavation report should be prepared after completion of the subsurface excavation program that presents the findings excavation, provides a reassessment of the significance of the subject area and sets out further management recommendations to mitigate harm to any identified Aboriginal objects.

- **Recommendation 3 – Unexpected Finds Protocol: Archaeological Material**

In the event that any archaeological material is uncovered during any site works, the following steps must be carried out:

- (h) All works must halt in the immediate area of the find to prevent any further impacts to the archaeological material.
- (i) The find must not be moved 'out of the way' without assessment.
- (j) A suitably qualified archaeologist and the Registered Aboriginal Parties for the ACHA must be contacted to determine the significance of the objects.
- (k) If determined to be an Aboriginal object, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided to AHIMS.
- (l) Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
- (m) The Applicant must consult with the Aboriginal community representatives, the archaeologist(s) and Heritage NSW to develop and implement management strategies for all Aboriginal objects.
- (n) Works may only recommence in the vicinity of the find with the approval of Heritage NSW.

▪ **Recommendation 4 – Unexpected Finds Protocol: Human Remains**

In the event that any human remains are uncovered during any site works, the following steps must be carried out:

- (a) All works must cease immediately in that area and the NSW Police and Heritage NSW contacted.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains.
- (d) The Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the human remains.
- (e) Works shall only recommence with the approval of Heritage NSW.

## 9. MITIGATION MEASURES

In alignment with the recommendations of the preceding section, the following mitigation measures are proposed.

Table 8 – Mitigation Measures

| Project Stage<br><i>Design (D)</i><br><i>Construction (C)</i><br><i>Operation (O)</i> | Mitigation Measure   | Relevant Section of Report |
|---|--|----------------------------|
| C   | <p>As the proposed works are likely to cause harm to Aboriginal objects, it is recommended that further archaeological investigation prior to commencement of the proposed works. The further archaeological investigation should comprise:</p> <ul style="list-style-type: none"> <li>(a) a subsurface Aboriginal archaeological excavation program undertaken in accordance with the Archaeological Research Design and Excavation Methodology detailed in Section 7 of this report.</li> <li>(b) The subsurface excavation program should be undertaken with the participation of nominated Aboriginal RAPs and appropriately qualified archaeologists.</li> <li>(c) To avoid unnecessary harm to Aboriginal objects and existing improvements and to avoid unnecessary disruption of UNSW operations, it is recommended that the subsurface excavation be undertaken after approval of SSD-74670005.</li> <li>(d) A post-excavation report should be prepared after completion of the subsurface excavation program that presents the findings excavation, provides a reassessment of the significance of the subject area and sets out further management recommendations to mitigate harm to any identified Aboriginal objects.</li> </ul> | Section 7                  |
| C   | <p>In the event that any archaeological material is uncovered during any site works, the following steps must be carried out:</p> <ul style="list-style-type: none"> <li>(a) All works must halt in the immediate area of the find to prevent any further impacts to the archaeological material.</li> <li>(b) The find must not be moved 'out of the way' without assessment.</li> </ul>  | Section 7                  |

| Project Stage<br><i>Design (D)</i><br><i>Construction (C)</i><br><i>Operation (O)</i> | Mitigation Measure  | Relevant Section of Report |
|---|---|----------------------------|
|   | <ul style="list-style-type: none"> <li>(c) A suitably qualified archaeologist and the Registered Aboriginal Parties for the ACHA must be contacted to determine the significance of the objects.</li> <li>(d) If determined to be an Aboriginal object, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided to AHIMS.</li> <li>(e) Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.</li> <li>(f) The Applicant must consult with the Aboriginal community representatives, the archaeologist(s) and Heritage NSW to develop and implement management strategies for all Aboriginal objects.</li> <li>(g) Works may only recommence in the vicinity of the find with the approval of Heritage NSW.</li> </ul> |                            |
| C   | <p>In the event that any human remains are uncovered during any site works, the following steps must be carried out:</p> <ul style="list-style-type: none"> <li>(a) All works must cease immediately in that area and the NSW Police and Heritage NSW contacted.</li> <li>(b) The find must not be moved 'out of the way' without assessment.</li> <li>(c) A suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains.</li> <li>(d) The Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the human remains.</li> <li>(e) Works shall only recommence with the approval of Heritage NSW.</li> </ul>   | Section 7                  |

## 10. REFERENCES

- AHMS 2010, *Royal Randwick Racecourse: Proposed Stables Precinct Redevelopment Aboriginal Heritage Impact Assessment*
- Attenbrow, V 2010, *Sydney's Aboriginal Past, 2<sup>nd</sup> Edition*, University of New South Wales Press, Sydney: Australia
- Austral & Godden Mackay 1995, *Archaeological Investigation: Randwick Destitute Children's Asylum Cemetery*
- Australia ICOMOS Incorporated 2013, *The Burra Charter, The Australia ICOMOS Charter for Places of Cultural Significance*
- Botanic Gardens of Sydney 2024, *Gadigal, Sydney*, New South Wales
- Clarkson, C., Jacobs, Z., Marwick, B., Fullagar, R., Wallis, L., Smith, M., Roberts, R.G., Hayes, E., Lowe, K., Carah, X., Florin, S.A., McNeil, J., Cox, D., Arnold, L.J., Hua, Q., Huntley, J., Brand, H.E.A., Manne, T., Fairbairn, A., Shulmeister, J., Lyle, L., Salinas, M., Page, M., Connell, K., Park, G., Norman, K., Murphy, T. and Pardoe, C. 2017, *Human occupation of northern Australia by 65,000 years ago*, *Nature*, vol. 547, pp. 306-310
- Coast 2018, *Aboriginal Cultural Heritage Assessment Progress Statement for Building D14, University of NSW Main Kensington Campus, Kensington NSW*
- Coast 2019, *Aboriginal Cultural Heritage Assessment Report: B22 University of New South Wales, Kensington, Randwick LGA*
- Department of Environment Climate Change and Water (DECCW) 2010a, *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*
- DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*
- DECCW 2010c, *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*
- Douglas Partners 2015, *Report on Supplementary Technical Investigation, Biological Sciences Upgrade, University of New South Wales, Kensington*
- Environmental Planning and Assessment Act 1979 (NSW)*
- Environment Protection and Biodiversity Conservation Act 1999 (Cth)*
- GML Heritage 2017, *Aboriginal Cultural Heritage Assessment Report: 4-18 Doncaster Avenue, Kensington*
- Heritage Act 1977 (NSW)*
- Holdaway and Stern 2004, *A Record in Stone: The Study of Australia's Flaked Stone Artefacts*
- Mary Dallas Consulting 2008, *Prince of Wales Medical Research Institute Project: Proposed Neuroscience Research Precinct Concept Plan and Project Application, Aboriginal Archaeology Preliminary Assessment*
- Mary Dallas Consulting 2011, *Preliminary Aboriginal Archaeological Assessment: Proposed New Acute Services Building for the Prince of Wales Hospital, Randwick, NSW*
- Mary Dallas Consulting 2012, *Preliminary Aboriginal Archaeological Assessment: Prince of Wales Hospital, Randwick NSW*
- Mary Dallas Consulting 2018, *Aboriginal Cultural Heritage Assessment, New Acute Services Buildings for the Prince of Wales Hospital Randwick NSW*
- National Parks and Wildlife Act 1974 (NSW)*
- National Parks and Wildlife Regulation 2019 (NSW)*
- Office of Environment and Heritage (OEH) 2011a, *Applying for an Aboriginal Heritage Impact Permit guide for applicants*
- OEH 2011b, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*

Philip 1892, *Governor Philip to Lord Sydney: Government House Sydney Cove 1790*, HR NSW, Vol.1, No.2, Government Printer, Sydney, pp.293-301

Randwick City Council 2024, *Indigenous History*, Sydney, New South Wales

Tench, W 1789, "A Narrative of the Expedition to Botany Bay", Sydney University Press

Tench, W 1793, "A Complete Account of the Settlement at Port Jackson", G. Nicol and J. Sewell

Urbis 2019, *Aboriginal Cultural Heritage Assessment Report: Royal Randwick Racecourse, Leger Lawn*

Urbis 2023, *Aboriginal Cultural Heritage Assessment: Hotel SSSA Royal Randwick Racecourse, Randwick, NSW*

Urbis 2024, *Aboriginal Cultural Heritage Assessment, E25 Biolink Redevelopment, UNSW Kensington Campus*

Williams, A.N., Atkinson, F., Lau, M., Toms, P., 2014. A Glacial cryptic refuge in southeast Australia: Human occupation and mobility from 36,000 years ago in the Sydney Basin, New South Wales. *Journal of Quaternary Science*, 29(8): 735-748

DRAFT

# DISCLAIMER

This report is dated 5 November 2024 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of the University of New South Wales (**Instructing Party**) for the purpose of an Aboriginal Cultural Heritage Assessment (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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

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

In preparing this report, Urbis may rely on or refer to documents in a language other than English, which Urbis may arrange to be translated. Urbis is not responsible for the accuracy or completeness of such translations and disclaims any liability for any statement or opinion made in this report being inaccurate or incomplete arising from such translations.

Whilst Urbis has made all reasonable inquiries it believes necessary in preparing this report, it is not responsible for determining the completeness or accuracy of information provided to it. Urbis (including its officers and personnel) is not liable for any errors or omissions, including in information provided by the Instructing Party or another person or upon which Urbis relies, provided that such errors or omissions are not made by Urbis recklessly or in bad faith.

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