



system that characterises most of eastern Sydney.<sup>2</sup> Geotechnical investigations show that the upper 0.5m of these dune deposits consists of fill and mixed sands, and is underlain by an A horizon consisting of pale dune sands. The B horizon (coffee rock) is approximately 2m below the current surface. It is known from elsewhere in the eastern suburbs that these dune deposits can include buried land surfaces which can contain archaeological evidence of past Aboriginal use. No evidence of buried land surfaces was observed during archaeologically monitored geotechnical investigations and significant evidence of historical disturbance suggests that any such surfaces will not have survived within the uppermost 0.5m of deposit. However, the dune deposit is considered to have Aboriginal archaeological sensitivity, as shown in **Figure 6**.

MDCA undertook a field inspection of the subject land in conjunction with the La Perouse Local Aboriginal Land Council in July 2016. The initial field inspection did not locate any Aboriginal stone artefacts, and none of the few mature trees within the subject land were found to contain scars of potential Aboriginal cultural origin. There are no previously recorded Aboriginal sites registered within the subject land. According to the AHIMS Register, a cluster of grinding grooves known as Gordons Bay (AHIMS #45-6-2306) recorded in 1992 are located within the subject land, but the coordinate for this site is incorrect and inconsistent with the site description. It is located 25m south of the subject land in the rock face above Gordons Bay. It will not be impacted by the current proposal.



**Figure 6. Current Aboriginal heritage management procedures in relation to the current development proposal. Green shading indicates extent of dune deposits, while blue shading indicates the likely extent of exposed sandstone.**

<sup>2</sup> Chapman, D. M. Cleary, M. Roy, P.S. Chapman, G & Murphy, C. 1989. *Soil Landscapes of the Sydney 1: 100 000 Sheet* (Soil Conservation Service of NSW, Sydney); Herbert, C. (ed.). 1980. *Geology of the Sydney 1:100,00 Sheet* (Geological Survey of NSW).



### 3. Project Timing and Aboriginal Community Consultation

The current proposal is shortly to be submitted to the Department of Planning & Environment for assessment as a State Significant Development under Section 89D of the *Environmental Planning & Assessment Act 1979*. As required by the *National Parks and Wildlife Regulation 2009*, MDCA has undertaken, on behalf of the proponent, public and direct Aboriginal community notification in relation to the current project. This has resulted in the compilation of a list of Registered Aboriginal Parties ('RAPs').

This document has been sent by post on 13/4/2017 to all RAPs to provide information on the current proposal as well as providing RAPs with an opportunity to comment on the proposed management strategy. In addition, RAPs (individuals and/or members or organisations) are asked to identify whether they are aware of any objects or places of cultural value to Aboriginal people in the subject land, and to provide information on these objects or places. A response time of 28 days has been provided to RAPs for comments relating to this document. Any comments provided to MDCA will be forwarded to the proponent for their consideration.

Due to timing constraints between the issuing of the SEARS for the project and the planned submission of the proposal, an Aboriginal Cultural Heritage Assessment report is currently being prepared for inclusion in an Environmental Impact Assessment to be submitted to the Department of Planning & Environment with the project application.

It is proposed that information and comments received in relation to the current document will be compiled in a draft addendum to that current report, outlining any additional issues identified and making additional or revised recommendations as required. It will also contain copies of relevant correspondence. This draft addendum, and the submitted Aboriginal Cultural Heritage Assessment report ('ACHA Report') will then be distributed to all RAPs for a further 28 day review and comment period. Subsequent to this, a final set of management recommendations will be produced, incorporating and detailing any comments received on the draft addendum and ACHA report from RAPs and will be submitted as part of the assessment documentation for the current proposal to the Department of Planning and Environment. A copy of all final Aboriginal cultural heritage assessment reporting will be made available to all RAPs at this time.

*Please note that if any information provided by RAPs to MDCA is of a culturally sensitive nature, please inform us so that appropriate protocols of access and use can be developed. It will otherwise be assumed that all information provided can be included and discussed in the Aboriginal Cultural Heritage Assessment report.*

In summary, there is presently an opportunity for RAPs to comment in relation to the proposed archaeological investigations, where input and information is sought on:

- Any objects or places of cultural value to Aboriginal people which may be located within the subject land.
- The proposed Aboriginal heritage management strategy in relation to the current proposal.



## 4. Assessment Methodology

The following methodology is proposed to be followed in relation to the management of Aboriginal cultural heritage in relation to the current proposal.

### ***Archaeological Assessment***

Archaeological assessment including background research, field inspection and an assessment of archaeological sensitivity has been conducted in 2016 by MDCA in consultation with the La Perouse Local Aboriginal Land Council, within whose administrative boundaries the subject land is situated.

So far, no Aboriginal archaeological remains have been documented within the subject land, and relatively intact remains could only be present in a band of up to 1.5m of archaeologically sensitive A2 horizon dune sands where it has survived between underlying B horizon coffee rock, and at least 0.5m of overlying fill and mixed sands. The majority of the proposed impacts that could penetrate into these archaeologically sensitive dune deposits are located within the footprint of existing buildings. Given the likely ephemeral and restricted extent of archaeological remains within these dune sands, it is not possible to determine in advance of initial demolition works, whether such archaeological remains exist. While preservation of archaeological remains is desirable, experience has shown that it is not always feasible in deep, loose sandy contexts.

For this reason, the proposed management strategy involves a combination of monitoring and archaeological excavation, with an overarching principle of preservation where possible. If the archaeological investigations uncover any Aboriginal archaeological remains, their extent, nature and significance will be used in conjunction with continued Aboriginal community consultation to determine appropriate management procedures within the scope of these practical parameters.

The proposed management of Aboriginal heritage within the scope of the current proposal will involve a combination of archaeological monitoring and archaeological test and/or salvage excavation where required. It is proposed that the procedures below be compiled in an Aboriginal Heritage Management Plan that will form part of construction documentation for the project as a condition of development consent.

### **Archaeological Monitoring**

The main aim of the archaeological monitoring will be to identify any actual or potential Aboriginal archaeological remains for further archaeological investigation by:

- Identifying surviving original dune/dune interface A horizon sands; and
- Locating any former contact or pre-contact land surfaces within A horizon sands upon which past Aboriginal activity may have been focussed.

The recommended means of archaeological monitoring will depend on the activity being undertaken.

### ***Earthworks more than 0.5m below the current surface***

Any earthworks within the area outlined in green in **Figure 4**, which penetrate more than 0.5m below the current surface will require archaeological monitoring. The monitoring should be undertaken by a suitably qualified archaeologist in consultation with the Registered Aboriginal Parties to the current project. It is expected that this will most likely occur in relation to:

- The demolition of existing buildings and removal of existing subsurface service infrastructure
- The installation of new service infrastructure requiring the excavation of new trenches.



Monitoring relating to building demolition will commence after the removal of above ground structures. If buried dune deposit/land surfaces are located, demolition works are to cease in the immediate area to allow archaeological test excavation/sampling to be undertaken in order to determine whether Aboriginal archaeological remains are present.

#### ***Earthworks less than 0.5m below the current surface***

Where earthworks of less than 0.5m in depth are proposed within the green shaded area in **Figure 4**, these are likely to be restricted to disturbed portions of the dune profile which would not warrant archaeological monitoring. However, as Aboriginal archaeological remains could potentially be present in disturbed contexts in these horizons, and to mitigate against disturbance to natural dune horizons should these be present at less than 0.5m below the surface in some areas, it is proposed that all workers involved in the excavation works onsite undertake an Aboriginal Cultural Heritage Induction as part of overall OH&S induction for the site. The Induction is to be delivered by a suitably qualified archaeologist in consultation with the Registered Aboriginal Parties to the current project. The Induction will detail stop-work procedures in the event that suspected Aboriginal cultural remains or natural dune profiles are uncovered during shallow earthworks. This will trigger an inspection by a suitably qualified archaeologist to determine whether further archaeological investigation is warranted.

#### ***Historical archaeological test excavations***

Test excavations were undertaken in April 2017 within the north-western portion of the subject land, comprising four mechanically excavated trenches to determine the presence/absence extent and significance of the archaeological remains of potential outbuildings associated with the original Cliffbrook Estate. These excavations were restricted in scope to uncovering either historical archaeological remains or exposing the upper surface of natural dune deposits, and did not involve excavation into archaeologically sensitive natural A2 dune deposit.

Where any further historical archaeological investigations are undertaken in conjunction with demolition and/or construction works, these will be directed by MDCA Historical Archaeologist Dan Tuck, who also has extensive experience in the identification of Aboriginal archaeological remains in historical archaeological contexts. The methodology of these excavations will take into consideration the recommended Aboriginal archaeological monitoring and excavations. Should any actual or potential items of Aboriginal heritage significance be exposed during the excavations, works will cease in the affected area and a decision will be made about appropriate management in conjunction with the OEH.

#### ***Landscaping within the eastern portion of the subject lands***

Where vegetation is to be removed or regenerated within the area of exposed sandstone in the easternmost third of the subject land as shown in **Figure 15**, archaeological inspection of any areas of sandstone exposed by these works should be undertaken by a suitably qualified archaeologist in consultation with the Registered Aboriginal Parties to the current project. This will ensure that any axe grinding grooves or other archaeological evidence are recorded and can be appropriately managed.

#### **Excavation Methodology**

The precise methodology for archaeological excavation will depend on the nature of the exposed landform and practical (WH&S) considerations. The aim of the excavation would be to determine, in the first instance by broad scale mechanical testing, whether any surviving original dune A horizon contains Aboriginal archaeological remains, including within buried former land surfaces. If such remains are present, they would be investigated through detailed manual excavation to fully assess the remains and determine appropriate management or conservation requirements. Based on strategies successfully used in previous archaeological excavations within similar contexts, the following methodology is proposed:



- 1. Mechanical trenches:** these will vary in size depending on the extent of exposed sand and practicalities of access e.g. after removal of building debris during demolition. Trenches will be excavated by a mechanical excavator using a batter (toothless) bucket and will be directed by a suitably qualified archaeologist in accordance with relevant WH&S considerations (e.g. metal shoring boxes, stepped trenches as required). Trenches will be excavated in 20cm spits and will be archaeologically monitored. Should a buried land surface with archaeological potential be uncovered, or any Aboriginal archaeological remains be identified, works will cease and further investigations will take place, if appropriate, by manually excavated squares. Otherwise, trenches will be excavated to B horizon coffee rock horizons. Except where clearly introduced, excavated deposits will also be sample sieved through nested 5mm and 2mm mesh sieves on site to determine whether any previously disturbed and dispersed low density archaeological remains may be present. All excavated pits will be fully recorded and backfilled on completion.
- 2. Manual Excavations:** If and when appropriate, a limited number of manual excavation squares (0.5m<sup>2</sup> or 1.0m<sup>2</sup> as appropriate) would be excavated to determine the presence/absence and/or nature of any archaeological remains identified during monitoring or to investigate buried land surfaces with archaeological potential. Excavation would proceed in 5-10cm spits or by context (as appropriate). All excavated material will be sieved onsite through nested 5mm and 2mm mesh sieves. Soil pH samples and where possible samples for radiometric dating will be taken and full recording of sections, plans and features will be made. All excavated pits will be backfilled.

A decision on appropriate management of any Aboriginal archaeological remains that are encountered during the test excavations will be made in consultation with the Registered Aboriginal Parties to the current project and will depend on the nature of the remains, the possibility for preservation and practical considerations such as the potential for damage to archaeological remains in loose sandy deposits once uncovered. It may for example, be appropriate and desirable to archaeologically salvage remains where preservation is not feasible.
- 3. Treatment of Human Remains:** It is considered possible that human remains may be encountered during the archaeological test excavations. If any bone is located which is thought to be human, all works will immediately cease in that area. Specialist physical anthropologist and MDCA associate Emeritus Professor Richard Wright will be called in to determine whether the remains are human, and whether they are likely to be Aboriginal or non-Aboriginal in origin. If they are confirmed as, or likely to be Aboriginal and old, discussions will be held with the La Perouse Local Aboriginal Land Council (who will be represented on site at all times) and the OEH to determine the most appropriate way to manage them. In all other cases, such as potentially recent Aboriginal bone or non-Aboriginal bone, the Police will be notified, as it may be a potential coronial matter.

### **Post-Excavation Analysis**

All Aboriginal cultural remains (apart from human bone) retrieved during the test excavations (e.g. animal bone and shell, stone, bone and shell artefacts) will be recorded and bagged prior to specialist analysis. If obtained, radiocarbon dating samples will be submitted to Waikato Radiocarbon Laboratory in New Zealand for dating.

Analysis of food remains (animal/fish/bird bone and shell) will involve species identification and quantification by weight and number of represented individuals for each excavated unit. This will allow us to describe what foods were eaten and in what relative quantities and possibly some information about how different foods were gathered and prepared and be comparable with a range of other analyses undertaken across the Randwick LGA in recent years. Stone artefacts will be analysed and classified according to established criteria of raw materials, form, reduction sequence and function.



## **Reporting and Artefact Management**

The results of any monitoring and archaeological excavations that are undertaken will be fully documented in an updated Aboriginal Cultural Heritage Assessment report. Any Aboriginal archaeological remains uncovered during the recommended investigations will be recorded on the AHIMS Register.

In the event that archaeological remains are uncovered, some form of onsite interpretation should be developed in consultation with the Registered Aboriginal Parties to the current project, and possibly in conjunction with the results of the historical archaeological investigations which are to take place on the site.

At present, it is not known whether any Aboriginal cultural remains will be retrieved during the proposed archaeological investigations, nor their nature or quantity. Given that this may vary in quantity and nature it is considered most prudent to determine final management (storage) of any Aboriginal archaeological material upon completion of the archaeological excavations and for this to be incorporated into finalised reporting. Archaeological material retrieved during the investigations will be stored temporarily at MDCA office premises.

## ***Aboriginal Cultural Assessment***

The Aboriginal cultural assessment is proposed to contain the following two elements:

1. Consideration of previous research into the Aboriginal cultural and historical associations with the subject land and surrounding areas; and
2. Seeking comment from Registered Aboriginal Parties (individuals and/or members of organisations) about:
  - any other places or objects of cultural value to Aboriginal people which may be relevant to the current proposed archaeological investigations; and
  - the proposed management strategy for Aboriginal heritage in relation to the current proposal.

Information received will be considered prior to the proposed Aboriginal archaeological investigations and will also be included and discussed as an addendum to the Aboriginal Cultural Heritage Assessment report currently being prepared for submission as part of the Environmental Impact Assessment for the current proposal.



## 5. Conclusions

This document has provided project information, an assessment methodology and proposed Aboriginal heritage management strategy in relation to the current proposal. Comment is sought from Registered Aboriginal Parties on the following matters:

- The assessment methodology.
- Any objects or places of cultural value to Aboriginal people which may be located within the area proposed for archaeological monitoring and excavations, or be relevant to those investigations.
- The potential management of artefacts retrieved during the proposed Aboriginal archaeological monitoring and excavations.

As noted above, where requested and appropriate, protocols can be developed for culturally sensitive information provided to MDCA. It is however essential that comments and information, preferably in writing, be received by MDCA no later than **12 May 2017** if they are to be considered prior to the commencement of the Aboriginal archaeological investigations. The proponent would appreciate your response at your earliest convenience.

Please also note as described above, any proposal for engagement in fieldwork is a commercial matter which the proponent will consider separately from the current process of comment and consultation.

If you have any questions or require any additional information, please contact Paul Irish on 0418 450 490.

Yours sincerely,

Paul Irish

Principal Consultant

Mary Dallas Consulting Archaeologists

13 April 2017



## **APPENDIX B**

### **AHIMS Records**





# National Parks and Wildlife Service

Box 1967, Hurstville NSW 2220. Tel: (02) 585 6444  
Standard Site Recording Form Revised 5/88



45-6-2306

1:250,000 map sheet: Sydney NPWS Code 1451

AMG Grid reference 339100 mE 6245850 mN  
 Full reference - please include leading digits  
 250K 250K  
 25K 5/6 25K

Scale of map used for grid reference [ ] 25K, 50K [ ] 100K [ ] 250K  
 Please use largest scale available (preferred)

1:25K, 50K, 100K map name: Bandi

HEAD OFFICE USE ONLY:

NPWS Site no: 45-6-2306

Site types: AGG. - (8)

Accessioned by: J.D. Date: 10-2-92

Data entered by: \_\_\_\_\_ Date: \_\_\_\_\_

Owner/Manager: W.C. HAYES

Address: HON SECRETARY  
 GORDONS BAY AMATEUR FISHING CLUB  
 CT 343 ALISON RD  
 COBBEE 2034

Site name: Gordons Bay Locality/property name: GORDONS BAY

NPWS District: Sydney Region: GORDONS BAY.

Reason for investigation: Apparent Shearwren grooves in rock face.

Portion no:  
Parish:

Photos taken?  
How many attached?

How to get to the site (refer to permanent features. give best approach to site eg. from above, below, along cliff. Ref. at end of  
 (Draw diagram on separate sheet.) Major Street Coogee and walk down pathway  
to Gordons Bay. Site is in newly created small park.  
Site previously covered by Scaevola.

Other sites in locality? Site Types include:  
Are sites in NPWS Register?

Have artefacts been removed from site? No. When? \_\_\_\_\_  
By whom? \_\_\_\_\_ Deposited where? \_\_\_\_\_

Is site important to local Aborigines? No.  
Give contact(s) name(s) + address(es)

Contacted for this recording?  
(Attach additional information separately) If not, why not?

Verbal/written reference sources (including full title of accompanying report)

NPWS Report Catalogue #

Checklist:  
surface visibility,  
damage/disturbance/  
threat to site

Condition of site:

Recommendations for management & protection (attach separate sheet if necessary):

Site recorded by: W.C. Hayes.  
Address/institution:

Date: 1/2/92

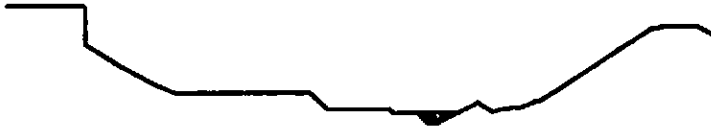


**SITE POSITION & ENVIRONMENT**

OFFICE USE ONLY: NPWS site no: *45-6-2306*

1. Land form a. beach/hill slope/ridge top, etc:  
 d. mark on diagram provided or on your own sketch the position of the site:

- b. site aspect: *on rock face above*  
 c. slope:  
 e. Describe briefly: *half buried cave.*



- f. Local rock type: *Sandstone*      g. Land use/effect:

2. Distance from drinking water: *Close to natural spring - also in previous water course*

3. Resource Zone associated with site (estuarine, riverine, forest etc): *ocean beach.*

4. Vegetation:

5. Edible plants noted:

6. Faunal resources (include shellfish):

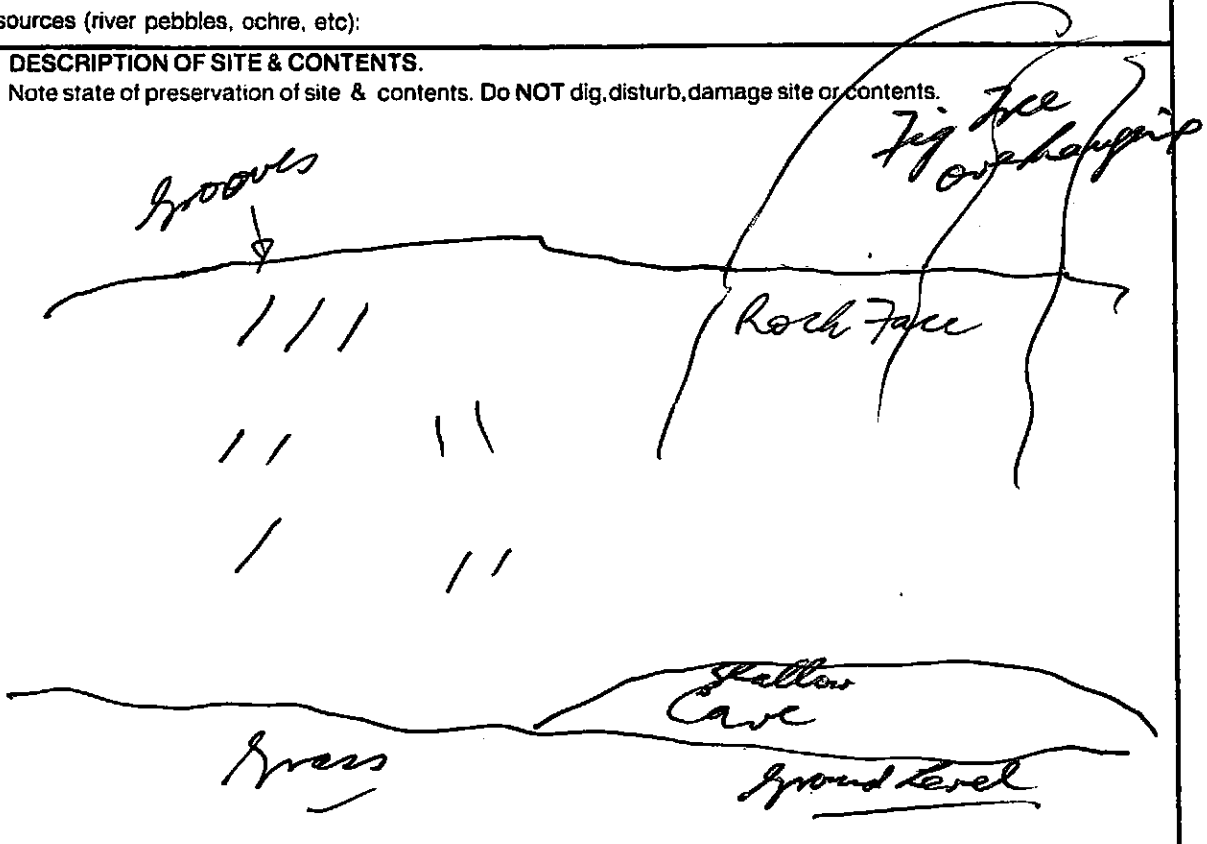
7. Other exploitable resources (river pebbles, ochre, etc):

Site type:

*ACG.*

**DESCRIPTION OF SITE & CONTENTS.**

Note state of preservation of site & contents. Do NOT dig, disturb, damage site or contents.



**CHECKLIST TO HELP:**  
 length, width, depth, height of site, shelter, deposit, structure, element eg. tree scar, grooves in rock.

**DEPOSIT:** colour, texture, estimated depth, stratigraphy, contents-shell, bone, stone, charcoal, density & distribution of these, stone types, artefact types.

**ART:** area of surface decorated, motifs, colours, wet, dry pigment, technique of engraving, no. of figures, sizes, patination.

**BURIALS:** number & condition of bone, position, age, sex, associated artefacts.

**TREES:** number, alive, dead, likely age, scar shape, position, size, patterns, axe marks, regrowth.

**QUARRIES:** rock type, debris, recognisable artefacts, percentage quarried.

**OTHER SITES EG.** structures (fish traps, stone arrangements, bora rings, mia mias), mythological sites, rock holes, engraved groove channels, contact sites (missions massacres cemeteries) as appropriate

*If the person inspecting the site could call at the Fishing Club before 10.30 AM any morning the Club caretaker Mr John Boulton will show him/her the site.*

Attach sketches etc. eg. plan & section of shelter, show relation between site contents, indicate north, show scale.

Attach annotated photos (stereo where useful) showing scale, particularly for art sites.

45-6-2306

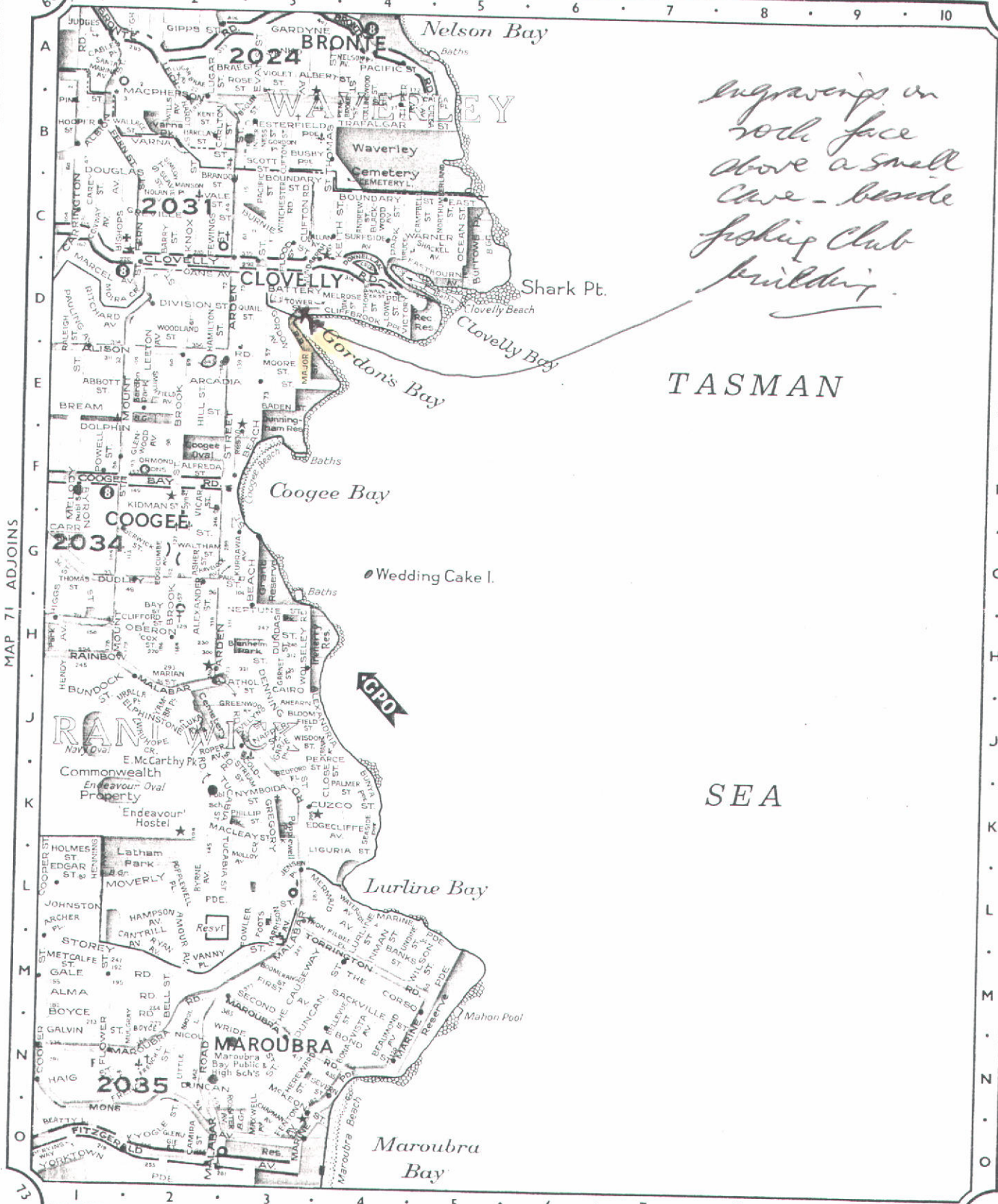
SCALE 1:23,760  
METRES 500 1000  
MILES 1/4 1/2

PUBLIC SCHOOL.....●  
PRIVATE SCHOOL.....○  
POLICE STATION.....□  
POST OFFICE.....+

BOY SCOUTS.....†  
GIRL GUIDES.....‡  
MAP 69 ADJOINS

PUBLIC TELEPHONE.....\*  
HOSPITAL.....+  
COUNCIL OFFICE.....+  
PLACE OF WORSHIP.....†

# MAP 72



*Engravings on  
rock face  
above a small  
cave - beside  
fishing club  
building.*

## TASMAN

## SEA

MAP 72 ADJOINS

MAP 71 ADJOINS

Universal Business Directories (Aust.) Pty Ltd.

MAP 74 ADJOINS

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