

Wollongong Private Hospital Extension

Aboriginal Cultural Heritage
Assessment Report

Report to 360 Property Agency

January 2026



 artefact

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Wollongong Private Hospital Extension
Aboriginal Cultural Heritage Assessment Report (ACHAR)

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EXECUTIVE SUMMARY

Background

360 Property Agency proposes to develop the existing Wollongong Private Hospital located at 360/354 Crown Street, Wollongong. The development is an extension of Wollongong Private Hospital located on Lot 2 DP1212956 at 360 Crown Street, Wollongong. The extension will incorporate numbers 15, 17, 19, 21 and 23 Urunga Parade and numbers 366 and 368 Crown Street, Wollongong. The development will expand the hospital's facilities to include a new Emergency Department, new inpatient facilities including oncology, ICU, OT, birthing courtyard and 3-level Medi Hotel. The development will also provide car parking, a new substation, plant room and proposed dedication of 366 & 368 Crown Street to the Illawarra Aboriginal Medical Services (IAMS).

The property is located within the Wollongong Local Government Area and within the boundary of the Illawarra Local Aboriginal Land Council. A Native Title Claim application (NC2017/003) was submitted on 17 January 2017 by the South Coast People for the area in which the study area is located.

The development proposal was submitted to the NSW Department of Planning, Housing and Infrastructure for consideration as a State Significant Development under part 4.1 of the *Environmental Planning and Assessment Act 1979*. The proposal was awarded status as a State Significant Development (SSD-84096206) on 10th November 2025. The Secretary's Environmental Assessment Requirements (SEARs) require that the Aboriginal Cultural Heritage values of the site be assessed prior to development commencing. Artefact Heritage has been engaged to prepare an Aboriginal cultural heritage assessment report for Wollongong Private Hospital project.

This ACHAR addresses the requirements of the SEARs (SEARs Item 19). The aim of this ACHAR is to identify Aboriginal cultural heritage values within the study area, conduct consultation with Aboriginal stakeholder groups and to assess impacts to Aboriginal heritage that may result from the proposal

Consultation with registered Aboriginal parties has been completed.

Overview of findings

The following results and recommendations are based on consideration of:

- The requirements of Aboriginal heritage guidelines including:
 - *The Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010a) – known as The Code of Practice
 - *Guide to investigating and assessing and reporting on Aboriginal Cultural Heritage in New South Wales* (OEH 2011) – known as ACHAR guidelines.
 - *The Aboriginal Cultural Heritage consultation requirements for proponents 2010* (OEH 2010b)- known as Consultation Guidelines)
- The project SEARs
- The results of the stakeholder consultation

- Extensive search of the AHIMS database
- In depth background research and assessment following and an archaeological site survey.

The assessment found that:

- No sites listed on the Aboriginal Heritage Information Management System (AHIMS) were discovered in the study area
- No previously unrecorded Aboriginal sites or objects were identified within the study area during the site survey.
- After physical examination of the study area and examination of historical aerial photography the study area has been assessed as being disturbed having nil to low potential to retain intact archaeological deposits
- Consultation with Registered Aboriginal Parties (RAPs) did not reveal specific social, cultural aesthetic or historical significance associated with the site.

Recommendations

Based on the results of this assessment and in accordance with Aboriginal heritage guidelines mandated in the SEARs for the proposal, the following recommendations are made:

- As the study area was found to be disturbed and to have a nil-low potential for Aboriginal objects to be located within it, it is recommended that further archaeological assessment is not required.
- As no specific social, cultural aesthetic or historical significance associated with the site was revealed, further consultation is not required unless unexpected objects are found during works, see below.
- If changes are made to the proposal that may result in impacts to areas not assessed by this ACHAR further assessment would be required.
- Unexpected Aboriginal objects remain protected by the *National Parks and Wildlife Act 1974*. If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find and Heritage NSW and Metropolitan LALC must be notified.
- If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity should cease, the site should be secured, and the NSW Police and Heritage NSW should be notified.

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1.0 INTRODUCTION

1.1 Project background

360 Property Agency (the proponent) proposes to develop the existing Wollongong Private Hospital located at 360/354 Crown Street, Wollongong. The development is an extension of Wollongong Private Hospital located on Lot 2 DP1212956 at 360 Crown Street, Wollongong. The extension will incorporate numbers 15, 17, 19, 21 and 23 Urunga Parade and numbers 366 and 368 Crown Street, Wollongong. The development will expand the hospital's facilities to include a new Emergency Department, new inpatient facilities including oncology, ICU, OT, birthing courtyard and 3-level Medi Hotel. The development will also provide car parking, a new substation, plant room and proposed dedication of 366 & 368 Crown Street to the Illawarra Aboriginal Medical Services (IAMS).

The property is located within the Wollongong Local Government Area (LGA) and within the boundary of the Illawarra Local Aboriginal Land Council. A Native Title Claim application (NC2017/003) was submitted on 17 January 2017 by the South Coast People for the area in which the study area is located.

The development proposal was submitted to the NSW Department Planning, Housing and Infrastructure for consideration as a State Significant Development (SSD) under part 4.1 of the *Environmental Planning and Assessment Act 1979*. The proposal was awarded status as a State Significant Development (SSD-84096206) on 10th November 2025. The Secretary's Environmental Assessment Requirements (SEARs) require that the Aboriginal Cultural Heritage values of the site be assessed prior to development commencing. Artefact Heritage has been engaged to prepare an Aboriginal cultural heritage assessment report (ACHAR) for Wollongong Private Hospital project.

This ACHAR will address the requirements of the SEARs (SEARs Item 19). The aim of this ACHAR is to identify Aboriginal cultural heritage values within the study area, conduct consultation with Aboriginal stakeholder groups and to assess impacts to Aboriginal heritage that may result from the proposal.

Consultation with registered Aboriginal parties (RAPs) has been completed.

1.2 Location

The study area (Figure 1) is located between Crown Street and Urunga Parade and covers several properties including: 360-364, 366 and 368 Crown Street; and 15, 17, 19, 21 and 23 Urunga Parade, Wollongong, NSW 2500. The properties cover the following lots:

- Lot A DP343680
- Lot B DP343680
- Lot D DP402234
- Lot 46 Section 1 DP5507
- Lot 47 Section 1 DP5507
- Lot 9 Section 1 DP5507
- Lot Null SP73256
- Lot 2 DP1212956
- Lot 1 DP1212956

Figure 1: Study Area



1.3 Overview of the project

Wollongong Private Hospital is a healthcare facility operated by Ramsay Health Care, one of Australia's leading private hospital operators. The existing hospital currently offers a full range of medical, surgical, and maternity services, including an intensive care unit, nine operating theatres, a cardiac catheter laboratory and a day oncology unit. As demand for health care services continues to expand in the local community, the proposed expansion of the hospital will provide additional operational capacity for the facility to provide general and specialised services.

The SSD Application will seek consent for the expansion of the Wollongong Private Hospital. This application seeks consent for lot consolidation, demolition of five dwellings, excavation, construction of a new twelve (12) storey western wing to the existing hospital, extension of the existing basement levels and an additional three (3) basement levels for parking and a new radiation oncology, and retention of two existing buildings, including the existing heritage item on the site for dedication of these buildings to the Illawarra Aboriginal Medical Service (IAMS) for medical use.

The proposed extension will consist of a new emergency department, satellite imaging, radiation oncology, additional patient units, expanded intensive care unit, operating theatres, recovery and central sterile supply department, meeting-conference spaces, tenancies with waiting rooms and amenities, offices and administration areas, plant and servicing areas. Furthermore, the proposal will provide medical accommodation at the upper levels of the expansion. The proposal will largely retain the form and internal layout of the existing hospital building including an existing radiology, pharmacy, café, kitchen and store, day surgery, oncology, in-patient units, cath lab, tenancy's, administration and plant room.

The proposal will also provide new vehicular access from Urunga Parade with one entry lane and two exit lanes off each street. Existing access from Crown Street will be maintained and lead to the ground level consisting of an ambulance bay, doctors parking and a public emergency drop off area exclusively for the Emergency Department only near the main entry lobby, which is to be retained as existing. The access from Urunga Parade will lead to the basement parking levels with drop off area for hospital patients and visitors and doctors parking and loading dock with turntable.

The proposal will also provide considerable landscaping cross the site and provide opportunities for public artwork.

Notably, the heritage building at No. 366 Crown Street and the existing building at No. 368 Crown Street will both be retained and existing uses as medical tenancy's maintained and leased to IAMS. Specifically, it is understood that the tenancy at No. 366 will be utilised as a birthing centre for expecting mothers of the Indigenous community whilst the tenancy at No. 368 will be utilised as a general medical centre for the Indigenous community, whereby both tenancy's will refer patients to the hospital where necessary. No changes are proposed to the existing buildings; however, landscaping and parking design will be enhanced which will improve upon the existing arrangements and ensure the sites are well-integrated with the hospital development.

The proposed expansion of the facility is illustrated in Figure 2 to Figure 9.

Figure 2. Footprint of proposed plan of basement 6 with current facility indicated in red.

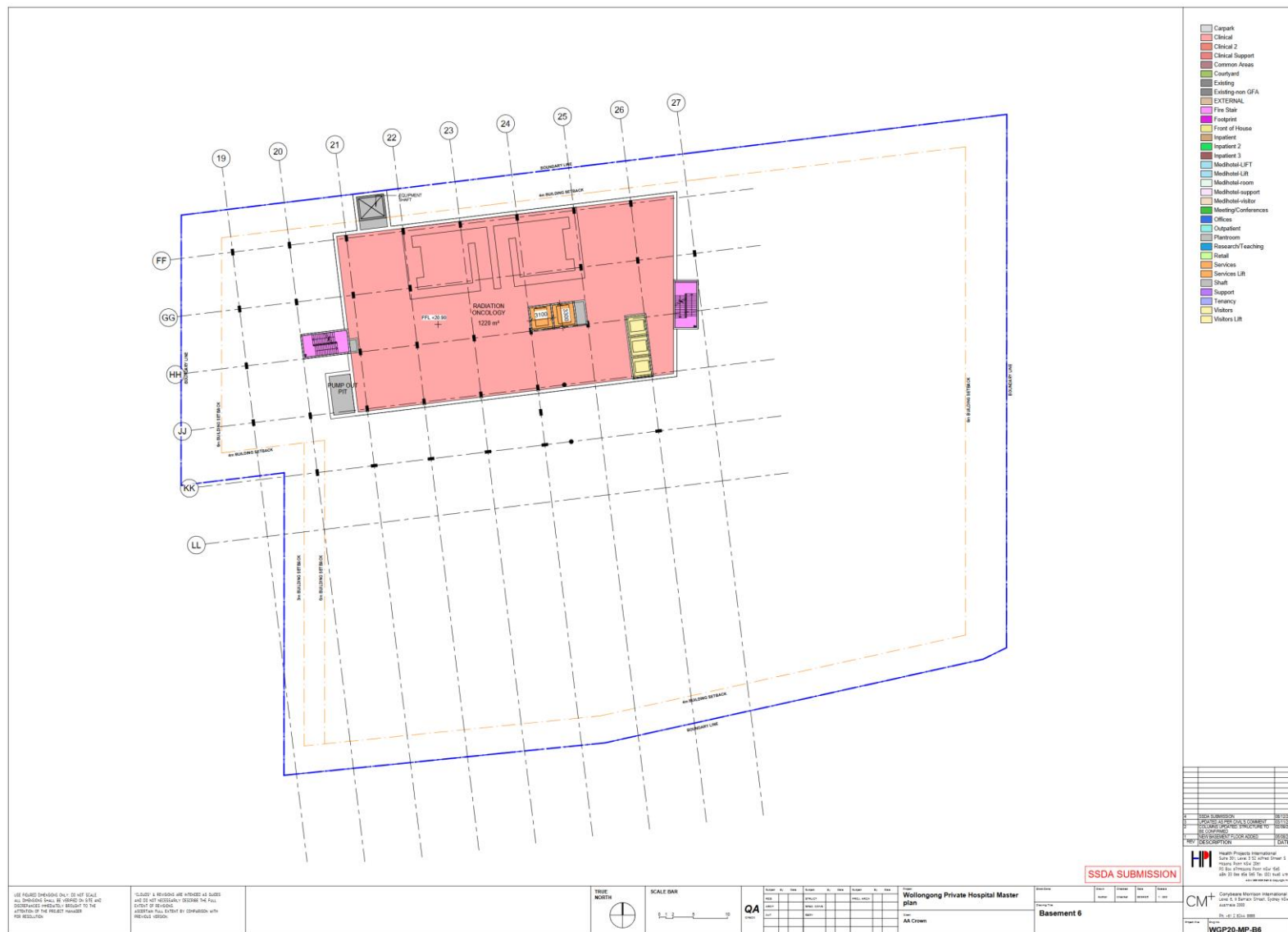


Figure 3. Footprint of proposed plan of basement 3.



Figure 4. Footprint of proposed plan of basement 2.



Figure 5. Footprint of proposed plan of lower ground level.



Figure 6. Footprint of proposed plan of ground level.



Figure 7. Proposed facility north elevation.

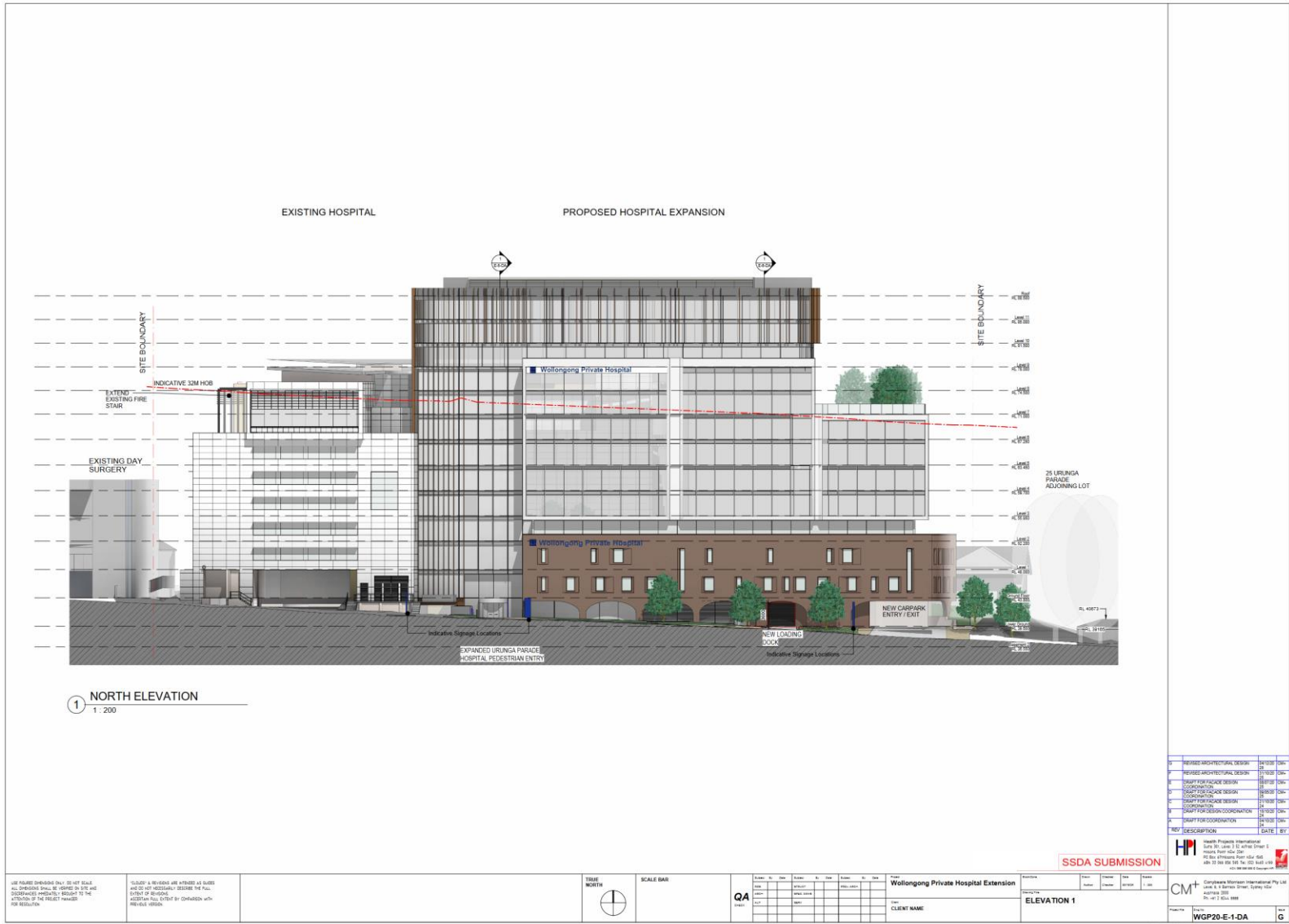


Figure 8. Proposed facility south elevation.

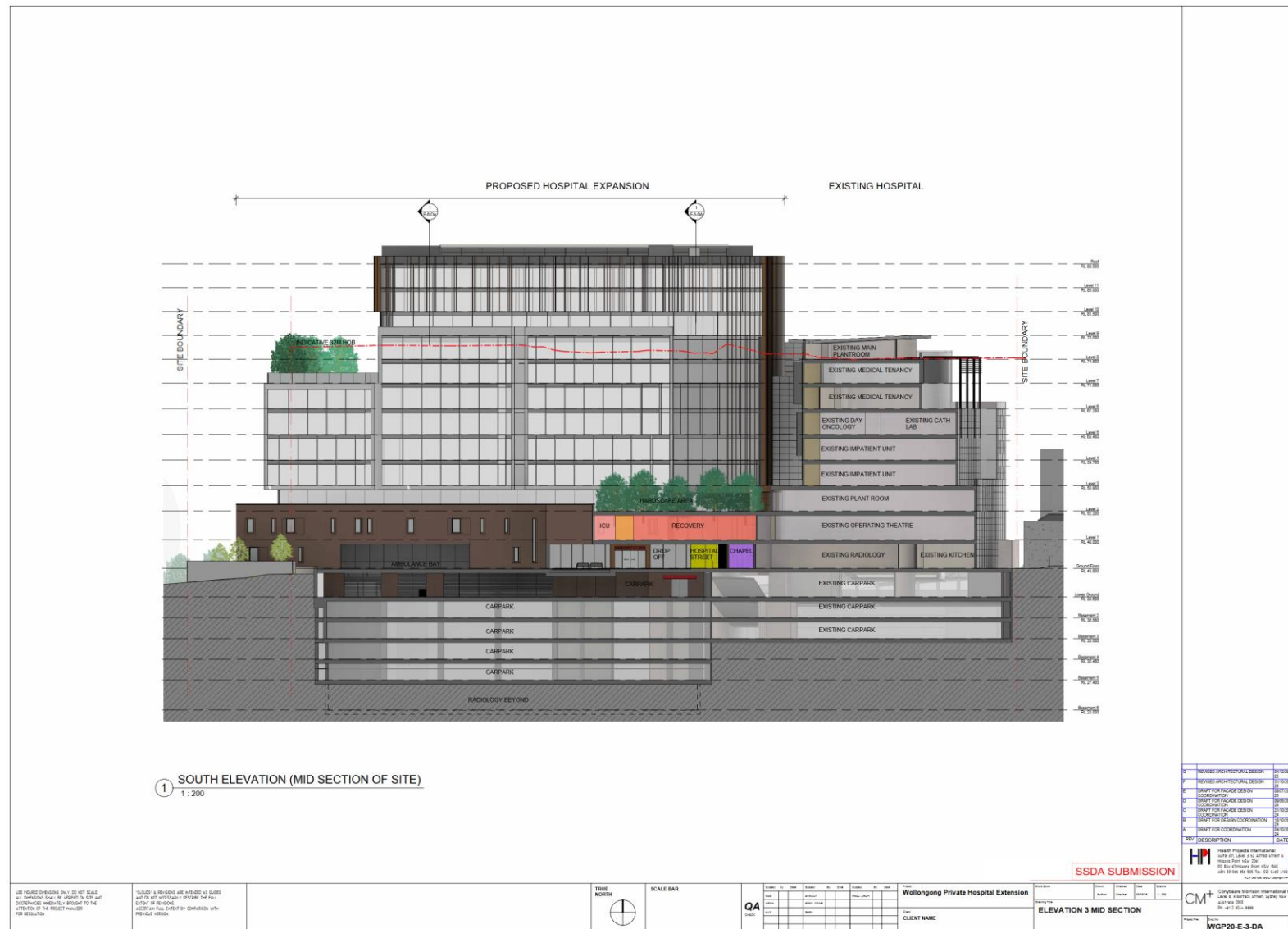
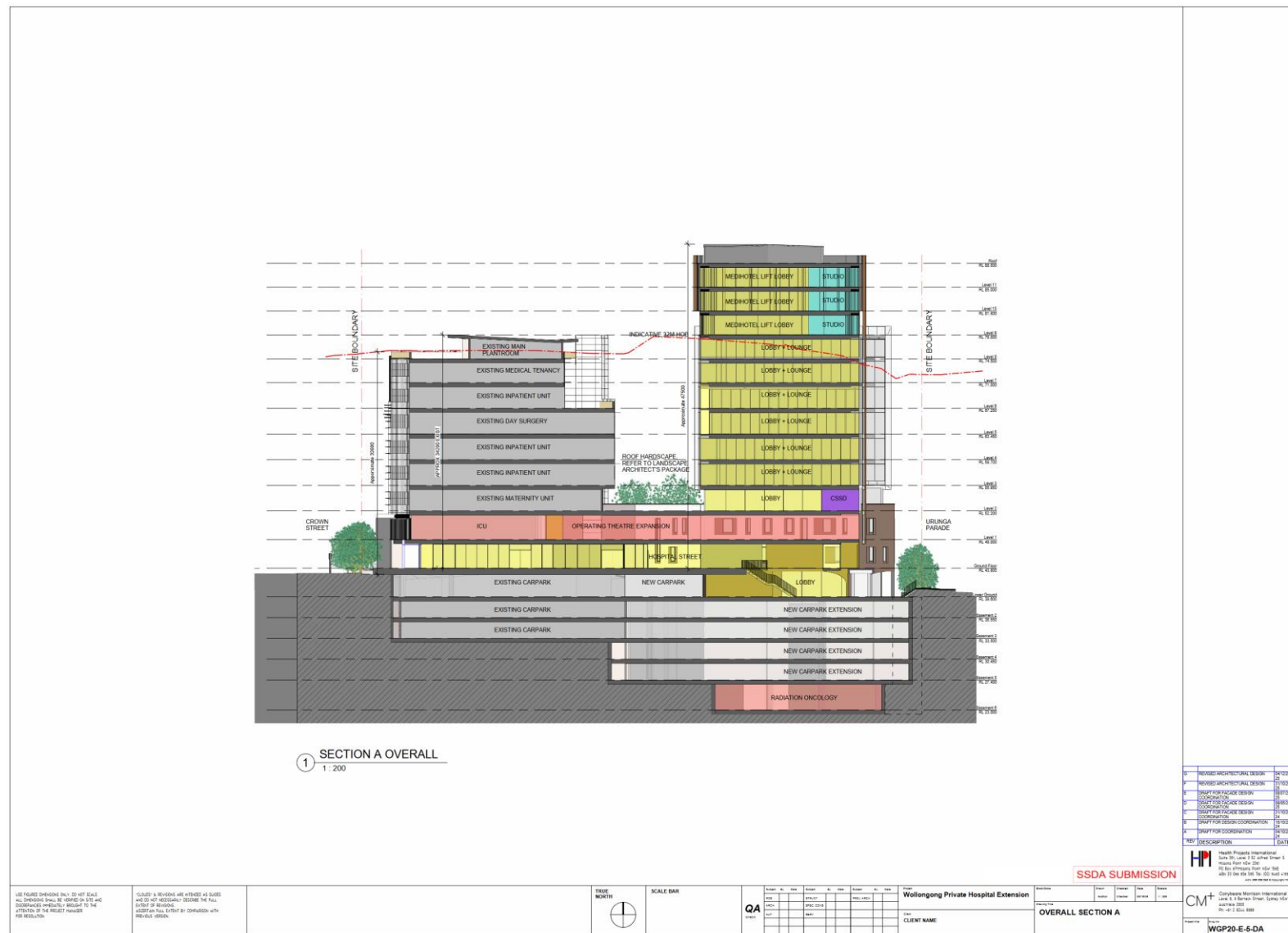


Figure 9. Proposed facility – overall cross section A elevation.



1.4 Purpose and scope of the report

Artefact Heritage has been engaged to prepare an ACHAR to meet the requirements of the SEARs. This report considers the impacts the proposed construction might have on Aboriginal cultural heritage and the potential archaeological resources within the study area. The report includes:

- Assessment of the Aboriginal cultural heritage values of the study area and identification of any specific areas of cultural significance
- Assessment of archaeological potential for the study area
- Aboriginal stakeholder consultation
- Preparation of a methodology for archaeological management including test excavation and salvage where required.

This ACHAR has been undertaken in accordance with the following guidelines:

- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010* (DECCW)
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011)
- *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW).

1.5 Secretary's Environmental Assessment Requirements

State Significant Developments.

The development proposal was submitted to the NSW Department of Planning, Housing and Infrastructure for consideration as a State Significant Development (SSD) under part 4.1 of the *Environmental Planning and Assessment Act 1979*. The proposal was awarded status as a State Significant Development (SSD-84096206) on 10th November 2025. The Secretary's Environmental Assessment Requirements (SEARs) for Hospitals, medical centres and health research facilities demand that the Aboriginal Cultural Heritage values of the site be assessed prior to development commencing.

Table 1, Section 8 outlines the specific requirements in relation to Aboriginal Cultural Heritage, which requires an ACHAR.

Table 1. Secretary's Environmental Requirements

Item	Secretary's Environmental Assessment Requirements	Where addressed in this report
19	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.	This report

1.6 Authorship

This ACHAR has been prepared by Elizabeth Bonshek (Senior Heritage Consultant, Artefact), Michael Lever (Heritage Consultant, Artefact), Alex Gaffikin (Senior Associate, Artefact), Sam Sammut (Senior Heritage Consultant, Artefact) and Neve Penklis (Graduate Heritage Consultant), with review and management provided by Sandra Wallace (Director, Artefact Heritage).

2.0 LEGISLATIVE CONTEXT

2.1 Introduction

There are several pieces of legislation that are relevant to the assessment of Aboriginal cultural heritage for the proposal. This chapter provides a summary of these Acts and the potential implications for the proposal.

2.2 NSW National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NPW Act) provides statutory protection to all Aboriginal places and objects. An Aboriginal Place is declared by the Minister, under Section 84 of the NPW Act in recognition of its special significance with respect to Aboriginal culture. Under Section 86 of the NPW Act objects are places are protected. An Aboriginal object is defined as:

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

The protection provided to Aboriginal objects applies irrespective of the level of their significance or issues of land tenure. However, areas are only gazetted as Aboriginal Places if the Minister is satisfied that sufficient evidence exists to demonstrate that the location was and/or is of special significance to Aboriginal culture.

If it is assessed that sites exist or there is a likelihood of existing within the activity area and maybe impacted by the proposed activity, further archaeological investigations may be required. The SSD requirements state that attempts to avoid damage must be made. Where damage is unavoidable the ACHAR and EIS must outline mitigation measures.

As the project is being assessed as State Significant Development under Part 4 Division 4.7 of the *Environmental Planning & Assessment Act 1979*, permits issued under the NPW Act are not required for works undertaken in accordance with the SSD Conditions of Approval issued by DPIE.

There are no gazetted Aboriginal Places in the study area. All Aboriginal objects, whether recorded or not, are protected under the NPW Act.

2.2.1 National Parks and Wildlife Regulation 2019

Under the authority of the NPW Act, the *National Parks and Wildlife Regulation 2019* provides regulations for Aboriginal heritage assessment and consultation with registered Aboriginal parties.

Part 5 (Division 2) of the National Parks and Wildlife Regulation sets out the requirements of a due diligence assessment process and provides requirements for more detailed assessment and consultation with registered Aboriginal parties for activities that may result in harm to Aboriginal objects. This includes:

- Clause 60 – consultation process to be carried out before application for Aboriginal Heritage Impact Permit (AHIP)
- Clause 61 – application for AHIP to be accompanied by cultural heritage assessment report.

In order to comply with Clause 60 and 61 of the National Parks and Wildlife Regulation 2019, preparation of an ACHAR and consultation with RAPs must be in accordance with the following guidelines:

- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010* (DECCW 2010b)
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011)
- *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010a).

The current assessment has been carried out in accordance with the above guidelines in order to meet the SEARs which refer to them.

2.3 NSW Environmental Planning and Assessment Act 1979

The *Environmental Planning & Assessment Act 1979* (EP&A Act) provides planning controls and requirements for environmental assessment in the development approval process. The EP&A Act consists of three main parts of direct relevance to Aboriginal cultural heritage: Part 3 which governs the preparation of planning instruments; Part 4 which relates to development requiring consent; and Part 5 which relates to activity that does not require consent. The project is subject to assessment and approval by the NSW Minister for Planning and Public Spaces under Part 4 Section Division 4.7 of the EP&A Act, which establishes an assessment and approval regime for SSD. An EIS supported by the current assessment has been prepared to assess the impacts of the proposal, in accordance with SEARs. Section 4.12(8) of the EP&A Act provides that environmental planning instruments (such as local environmental plans and SEPPs) do not, with some exceptions, apply to SSD projects. Notwithstanding, the environmental planning instruments that are relevant to the proposal have been considered for consistency, as described below.

2.3.1 Wollongong Local Environmental Plan (LEP)

Planning decisions within LGAs are guided by Local Environmental Plans (LEPs).

LEPs are prepared by councils in accordance with the EP&A Act to guide planning divisions for LGAs. Each LGA is required to develop and maintain an LEP that includes Aboriginal and historical heritage items listed within its schedule and which are protected under the EP&A Act and the *Heritage Act 1977*.

The study area is subject to the Wollongong Local Environmental Plan 2009 (2010 EPI 76). Section 5.10 states that one of the objects of the plan is to:

(d) to conserve Aboriginal objects and Aboriginal places of heritage significance.

There are two declared Aboriginal Places under the NSW *National Parks and Wildlife Act 1974* in the Wollongong LGA. In 2007 Sandon Point (approximately 15 km north of the study area) was declared

an Aboriginal Place, followed by formal recognition of the Bellambi Point Aboriginal Place in 2012 (approximately 8.5 km north of the study area) (Declared Aboriginal Places Council Heritage document 2019). Although there is one LEP listed item within the study area and one abutting it (Figure 10), neither item is associated with Aboriginal cultural heritage.

However, as the development project has been approved as an SSD, a development application will not be required to be approved by Council.

Figure 10: Heritage listings within and immediately adjacent to the study area



2.4 NSW Aboriginal Land Rights Act 1983

The *Aboriginal Land Rights Act 1983* (ALR Act) established Aboriginal Land Councils (at State and Local levels). These bodies have a statutory obligation under the ALR Act to:

- (a) take action to protect the culture and heritage of Aboriginal persons in the council's area, subject to any other law, and
- (b) promote awareness in the community of the culture and heritage of Aboriginal persons in the council's area.

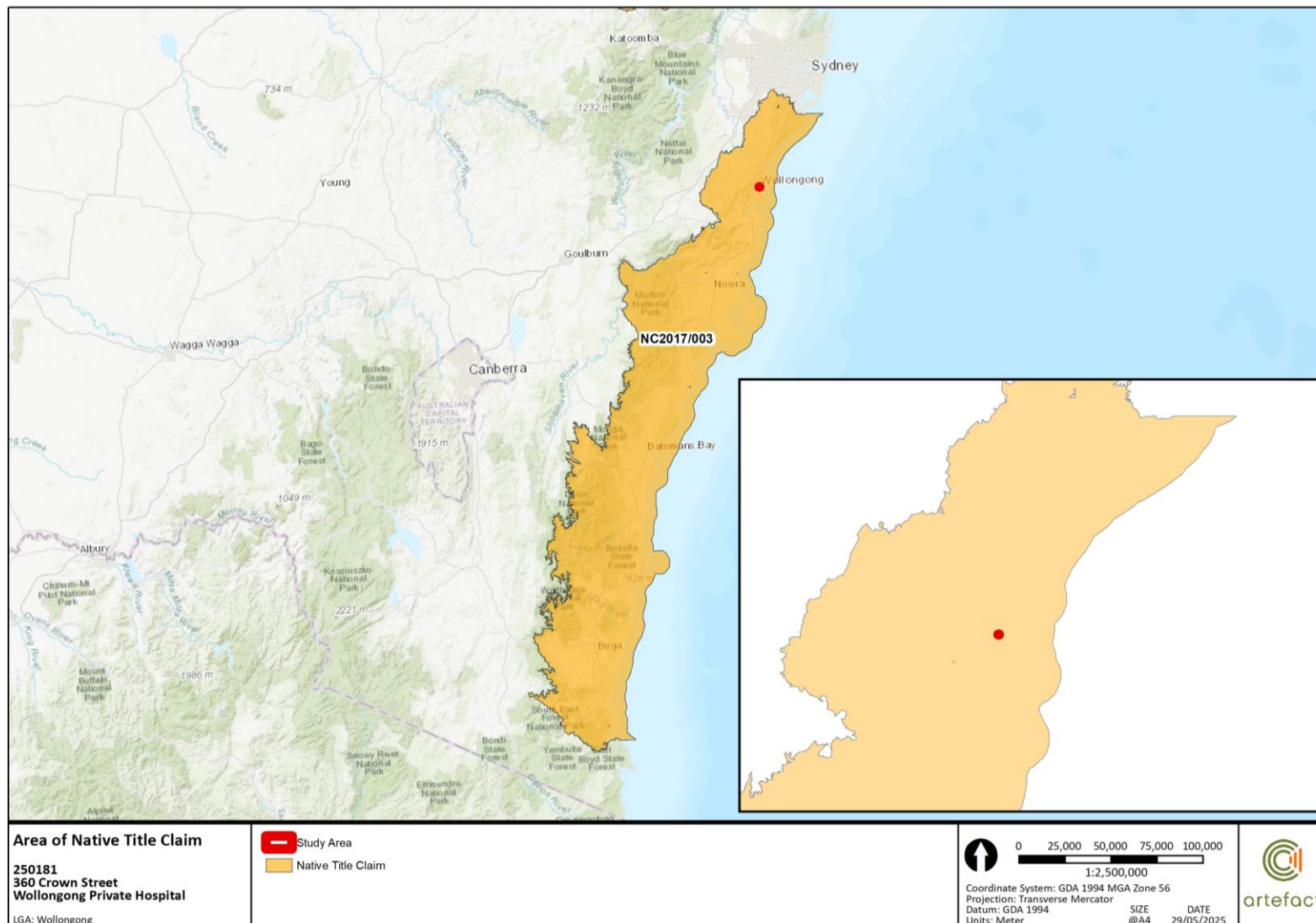
The study area is within the boundary of the Illawarra LALC.

2.5 NSW Native Title Act 1994

The *Native Title Act 1994* was introduced to work in conjunction with the Commonwealth *Native Title Act 1993*. Native Title claims, registers and Indigenous Land Use Agreements are administered under the Act.

A search of the Native Title Register revealed that the South Coast People submitted a Native Title Claim in 2017 (NC2017/003) which covers the area in which the study area sits. The extent of the claim is presented in (Figure 11. Area of Native Title Claim of South Coast People (Source: Wollongong LEP 2009). The existence of this claim requires the proponent to consult with the South Coast People as an integral part of the ACHAR process.

Figure 11. Area of Native Title Claim of South Coast People (Source: Wollongong LEP 2009)



2.6 Commonwealth Environment Protection and Biodiversity Conservation Act 1999

The *Environment and Heritage Legislation Amendment Act (No. 1) 2003* amends the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to include 'national heritage' as a matter of national environmental significance and protects listed places to the fullest extent under the Constitution. It also establishes the National Heritage List and the Commonwealth Heritage List.

The *Australian Heritage Council Act 2003* establishes a new heritage advisory body – the Australian Heritage Council – to the Minister for the Environment and Energy and retains the Register of the National Estate.

The *Australian Heritage Council (Consequential and Transitional Provisions) Act 2003* repeals the *Australian Heritage Commission Act 1975*, amends various Acts as a consequence of this repeal and allows the transition to the current heritage system.

Together the above three Acts provide protection for Australia's natural, Indigenous and non-Indigenous heritage. The new framework includes:

- A new National Heritage List of places of national heritage significance
- A Commonwealth Heritage List of heritage places owned or managed by the Commonwealth
- The creation of the Australian Heritage Council, an independent expert body to advise the Minister on the listing and protection of heritage places
- Continued management of the non-statutory Register of the National Estate.

2.6.1 National Heritage List

The NHL is a list of places with outstanding heritage value to our nation, including places overseas. So important are the heritage values of these places that they are protected under the EPBC Act. This means that a person cannot take an action that has, will have, or is likely to have, a significant impact on the national heritage values of a national heritage place without the approval of the Australian Government Minister for the Environment and Heritage

There are no items listed on the National Heritage List located within the study area for this assessment.

2.6.2 Commonwealth Heritage List

The Commonwealth Heritage List (CHL) is a list of places managed or owned by the Australian Government and not of relevance to this project.

There are no items listed on the Commonwealth Heritage List located within the study area for this assessment.

3.0 SUMMARY OF CONSULTATION

3.1 Aboriginal consultation

Aboriginal community consultation has been conducted in accordance with the Consultation Requirements (DECCW 2010a).

A consultation log has been maintained which details all correspondence with the registered Aboriginal parties for the ACHAR (see Appendix).

3.2 Identification of stakeholders and registration of interest

3.2.1 Consultation Process for the ACHAR (2022)

The SEARs was awarded on 10th November 2025 and the consultation process for this ACHAR commenced in January 2022.

In accordance with Section 4.1.2 of the Consultation Requirements, Artefact Heritage corresponded with the following organisations by email on the 17 January 2022 requesting the details of Aboriginal people who may hold cultural knowledge relevant to determining the Aboriginal significance of Aboriginal objects and/or places within the local area:

- Illawarra Local Aboriginal Land Council
- Wollongong City Council
- Native Title Service Corporation (NTSCorp)
- Heritage NSW
- National Native Title Tribunal
- Office of the Registrar, Aboriginal Land Rights Act 1983.

In addition to this, and in accordance with Step 4.1.3 of the Consultation Requirements, an advertisement was placed in Illawarra Mercury on 22 January 2022-inviting the participation of Aboriginal people who may hold cultural knowledge relevant to determining the Aboriginal significance of Aboriginal objects and/or places within the local area. In accordance with Section 4.1.3 of the Consultation Requirements, on the 7 February 2022 emails or letters were sent to all Aboriginal persons or organisations identified through advertisement or through responses from agencies contacted as part of Section 4.1.2 inviting them to express their interest in registering for the project. In accordance with Section 4.2 the letters provided details about the location and nature of the proposal.

As a result of that process 13 groups or individuals registered their interest (see Table 2). One RAP responded after the due date. A copy of the proposed assessment methodology was sent to registered Aboriginal parties (RAPs) by email on 3 March 2022, requesting comments by 31st March 2022. At the end of this period, one (1) RAP had responded (Table 3).

Heritage New South Wales was informed of the RAP list by email on 8 March 2022.

Table 2. Registered Aboriginal parties for the study area

Organisation/ Individual	Contact Name
South Coast People	
Murra Bidgee Mullangari Aboriginal Corporation	
Woronora Plateau Gundungara Elders Council	
Duncan Falk Consultancy	
Corroboree Aboriginal Corporation	
Woka Aboriginal Corporation	
Muragadi	
Illawarra Local Aboriginal Land Council	
Guunamaa Dreamin Sites and Surveying	
Gunjeewong Cultural Heritage Aboriginal Corporation	
Thoorga Nura	
Warra Bingi Nunda Gurri	
Eora Heritage Group	

A summary list of RAP comments is presented in Table 3.

Table 3. Summary of RAP comments on ACHAR methodology.

Name	Comments
Corroboree Aboriginal Corporation	"We agree with the draft"

On 1 April 2022 the draft ACHAR was emailed to the RAPs for feedback and comment. Feedback on the draft was due 28 days later on 29 April 2022. Table 4 presents the comment of the RAP who responded.

Table 4. Summary of RAP comments on draft ACHAR.

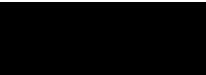
Name	Comments
 Illawarra Local Aboriginal Land Council	“ILALC has read this document. The ACHAR did not identify any Aboriginal objects within the proposed footprint. It concluded that there is 'nil-low' potential for Aboriginal objects to be located within the proposed development footprint. Based on this information (and the supporting background data), ILALC supports the recommendations made within the ACHAR.” Requested that RAP groups be included for notification in the Unexpected Finds section (9.2)

The findings and recommendations of the ACHAR were supported by those RAPs who participated in the consultation process.

3.2.2 Consultation Process for the updated ACHAR (2025)

The scope of works on the original design plan for Wollongong Private Hospital were expanded to include Lot 46 DP5507. Therefore, this updated ACHAR was emailed to the RAPs for feedback and comment. Feedback on the draft was due 28 days later on the 25 December 2025. Table 5 presents the comment of the RAPs who responded.

Table 5: Summary of RAP comments on updated draft ACHAR

Name	Comments
 – South Coast People	“I no longer work for NTSCORP LTD. For any urgent research enquiries please send email to the below: info@ntscorp.com.au”
 - Eora Heritage Group	“my names Leroy butler im from Eora aboriginal heritage group I'm a traditional owner stake holder of this Illawarra region and I would like to register my group for this project an any upcoming projects”

The findings and recommendations of the ACHAR were supported by those RAPs who participated in the consultation process.

4.0 SUMMARY AND ANALYSIS OF BACKGROUND INFORMATION

4.1 AHIMS search

Note: The location of Aboriginal sites is considered culturally sensitive information. It is advised that this information, including the AHIMS data appearing on mapping below must be removed from this report if it is to enter the public domain.

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) was undertaken on 13 May 2025 (Client Service ID: 57036) to determine the location of Aboriginal sites in relation to the current study area. The search area was defined as 10km x 10km in every direction of land surrounding the study area to inform the characterisation of the local archaeological context. The AHIMS search parameters were as follows:



The extensive search identified that there were 41 AHIMS registered sites located within the search area (Figure 12). There were no registered AHIMS sites within the study area (Figure 13). The nearest AHIMS site, AHIMS ID 52-2-4498, is approximately 1.5km east of the study area at its closest point (Figure 13).

The AHIMS database records sites using a list of twenty standard site types, and more than one feature can be used for each site. The search results identified fifteen site features located within the extensive search. The most common site features were 'Artefact', 'Potential Archaeological Deposit (PAD)', and 'Shell, Artefact'. They are defined as follows:

- 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
- Potential Archaeological Deposit (PAD): An area where Aboriginal objects below the ground surface
- 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. Must be found in association with other objects like stone tools, fish bones, charcoal, fireplaces/hearths, and burials. Will vary greatly in size and components

While the AHIMS extensive search identified some sites within residential areas in Wollongong, the majority of sites were identified along the coastline or within remnant bushland, especially within the Escarpment. This suggests that there is greater potential for Aboriginal objects to be present in areas along the coastline where marine resources would have been utilised or within less disturbed areas of bushland where Aboriginal objects would have less likely been destroyed or impacted by residential developments and infrastructure.

Figure 12: AHIMS extensive search results

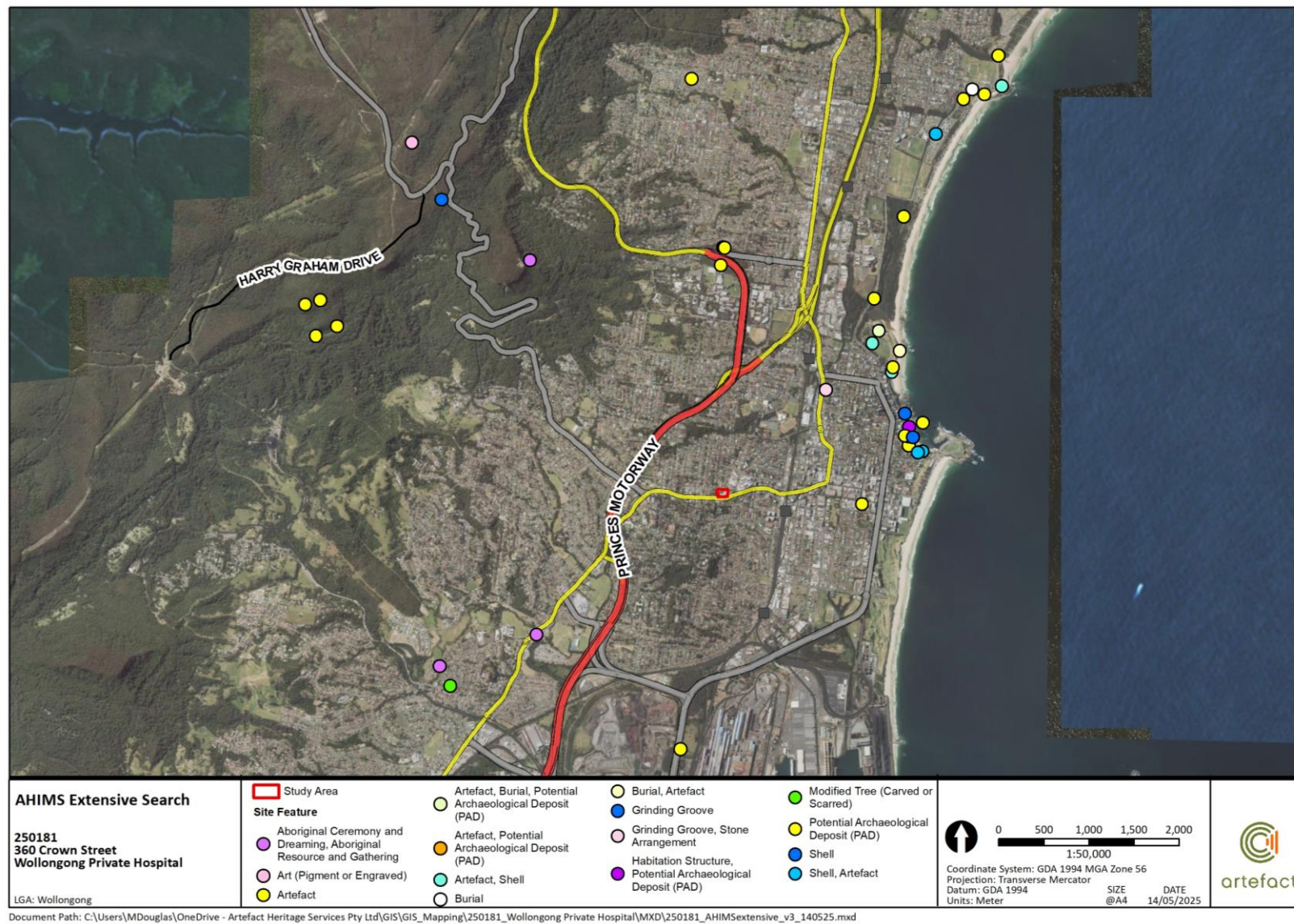
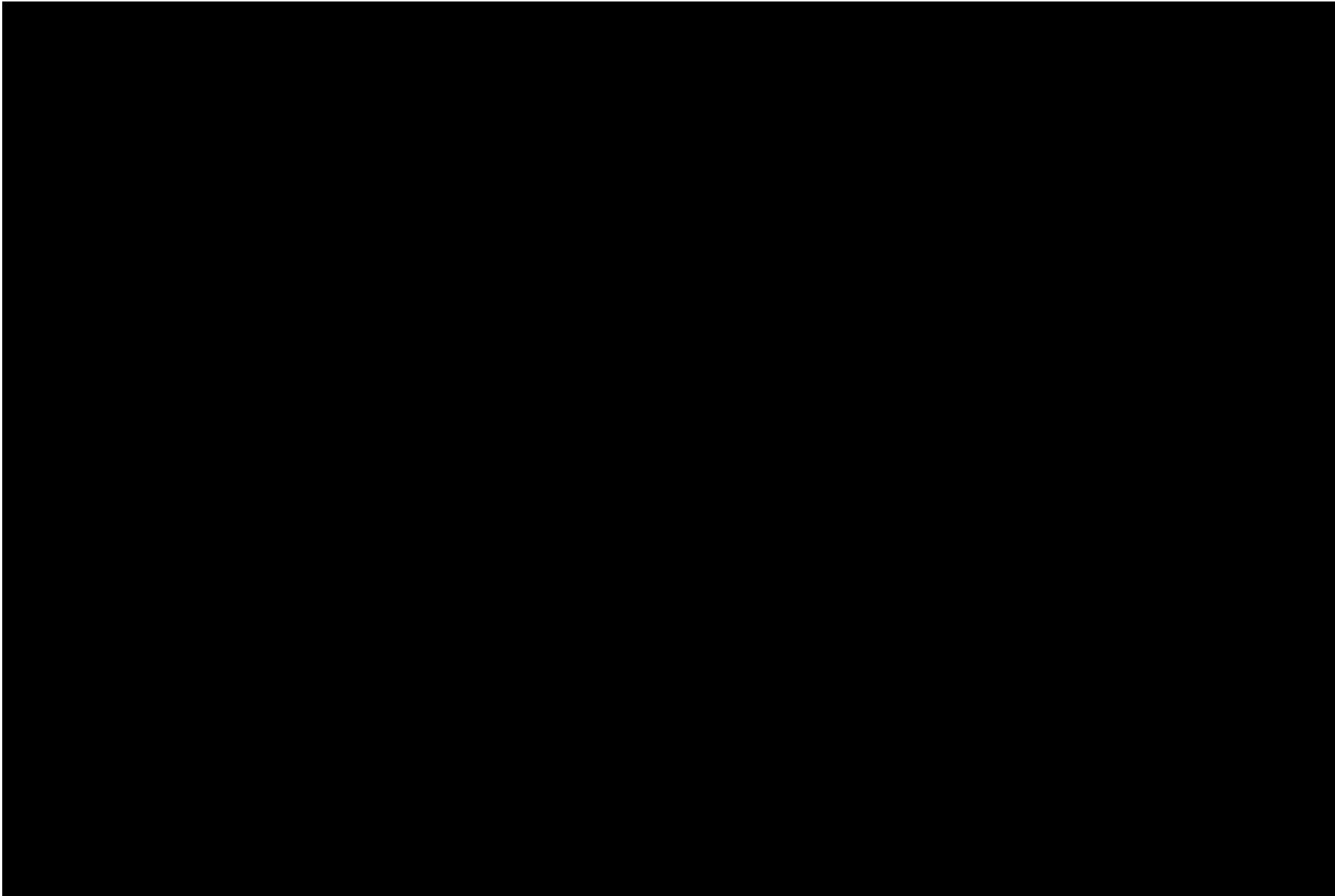


Figure 13: AHIMS detailed search results



4.2 Historical and archaeological background

4.2.1 Historical and ethnographic background

Aboriginal people were highly mobile hunter-gatherers utilising different landform units and resource zones. Different resources may have been available seasonally, necessitating movement or trade across the landscape (Attenbrow 2010: 78). Men traditionally hunted on land and fished with spears or lines from canoes, while women gathered vegetables, shellfish and fished with shell hooks and lines, nets, or spears. Accounts of women diving for lobsters off the entrance to the Shoalhaven River are known, as well as fishing in the local creeks, lagoons and wetlands (Organ and Speechley 2006).

The coastal landscape of Illawarra provided an abundance of natural resources, including a small, sheltered harbour, fresh water and rock shelves. The sea and other water sources provided a diet of fish and shellfish, with Lake Illawarra, Tom Thumb Lagoon and Coomaditchy Lagoon acting as important locations for these resources. Aboriginal people managed the water by engineering the impounding or exit of water from Lake Illawarra to catch fish or protect their settlements from flooding (Kass 2010).

The Illawarra region is the traditional country of the Dharawal speaking Aboriginal people (Wollongong City Libraries, n.d.), notably the Wodi Wodi Aboriginal group (NSW OEH 2006). The Dharawal people occupied large areas of Sydney, ranging from Broken Bay in the north to the Illawarra and Shoalhaven districts in the south, and as far west as Liverpool and Parramatta (Wollongong City Council 2020). The Wodi-Wodi group lived within the southern portion of Dharawal country, concentrated around Lake Illawarra. Known Wodi-Wodi campsites are located at Berkeley and Hooka Creek (Wollongong City Council 2020). Traditional histories tell of the arrival of the first Dharawal people at the mouth of Lake Illawarra in canoes in time immemorial. The Dharawal or Cabbage Tree Palm was brought to the area at this time and was a sacred tree that gave the Dharawal people their name (Figure 14) (NSW OEH 2006). This tree also produced a source of food for the Aboriginal people (Kass 2010).

Archaeological research, including carbon dating of a campsite located at Bass Point to the south of the study area, shows that the Wodi Wodi people lived in the Illawarra Region at least 20,000 years ago. During this period, the coastline of Wollongong would have been located approximately 15-20 kilometres east of its present location as the sea levels were much lower during the glaciation period (Donaldson, M., et al., 2015). When the sea levels stabilised about 6,500 BP, coastal lagoons at Lake Illawarra and Fairy Creek were formed altering the available food sources for the Aboriginal peoples of Illawarra (Kass 2010)

Figure 14. Cabbage Tree Forest, Illawarra Region by Augustus Earle, 1827. Source: National Library of Australia. (Image, painting by Earle, A., 1827. 'Cabbage tree forest, Illawarra, New South Wales.' *National Library of Australia*. Accessed online 17/2/2020 at: <https://nla.gov.au/nla-obj-134499059/view>).



4.2.2 Previous archaeological studies

A number of archaeological investigations have been completed in the vicinity of the study area. These have generally been associated with the development of infrastructure and urban release projects. The following discussion presents a review of the most recent and relevant studies and aims to provide contextual information for the current study.

Aboriginal Heritage Study of Sandon Point (Therin 2003)

In 2003 Therin undertook an Aboriginal Heritage Study of Sandon Point, approximately 13 km north of the study area, which was commissioned by Wollongong City Council. This followed from significant excavations of middens at Sandon Point by Fullager & Head in 1990 (Fullager 1990). The study found that Sandon Point, located on the coastal plain rather than the Illawarra Escarpment, features an environmental context and archaeological record which is dissimilar to Illawarra Escarpment region. The coastal plains of Sandon Point featured extensive middens and Aboriginal burial places. Sandon Point is also culturally significant as an Aboriginal meeting place. In 2007 Sandon Point was gazetted as an Aboriginal Place.

West Dapto Urban Release Area Preliminary Aboriginal Heritage Assessment (Australian Museum Business Services (AMBS) 2010 also see below, Predictive Model).

AMBS undertook a preliminary Aboriginal and historic heritage assessment for the West Dapto Urban Release Area (2010). While examining the West Dapto area, the study assessed the entirety of Wollongong and surrounds of Lake Illawarra which includes the current study area.

In assessing regional trends for Aboriginal archaeology in the Illawarra, AMBS noted that most Aboriginal sites within the region date to within the last 6,000 years, with many shell midden sites dating back to at least 3,000 years (AMBS, 2010).

AMBS documented that the coastal sections of the Illawarra have been subject to more archaeological investigation than hinterland areas and as such shell middens and artefact scatters are the most common sites. Other less common site types included burial, ceremony and dreaming, scarred trees, resource and gathering areas, potential archaeological deposits, rock shelters and habitation structures. Shell middens tend to be located in coastal areas, while artefact scatters occurred across a range of landforms. Based on the regional trends identified by AMBS, it is very likely that shell middens and open camp sites existed at one time along the margins of the former Tom Thumb Lagoon.

Figure 15 shows the distribution of 309 aboriginal sites recorded at the time of AMBS' assessment and shows the concentration of sites south of the Wollongong city area: there is no concentration of sites in the proximity of the study area

Archaeological Report 7 Harbour Street, Wollongong (Amac Group 2013)

Biosis were commissioned by Cardno in 2017 to prepare an Aboriginal Cultural Heritage Due Diligence Assessment for works within Lot 100 DP 1207784 Cordeaux Road, Mount Kembla for proposed subdivision of the property located approximately 9 km west of the study area. The soil landscapes and landforms suggested that erosion and aggradation of the landscape would have significantly lowered the potential for Aboriginal archaeological deposits and cultural material. Much of the site was characterised as a floodplain which would have further removed archaeological deposits. It was determined that the site contained low archaeological potential, and no further assessments were recommended.

Figure 15. The distribution of AHIMS sites in the Wollongong area in 2010 (AMBS 2010: 39).

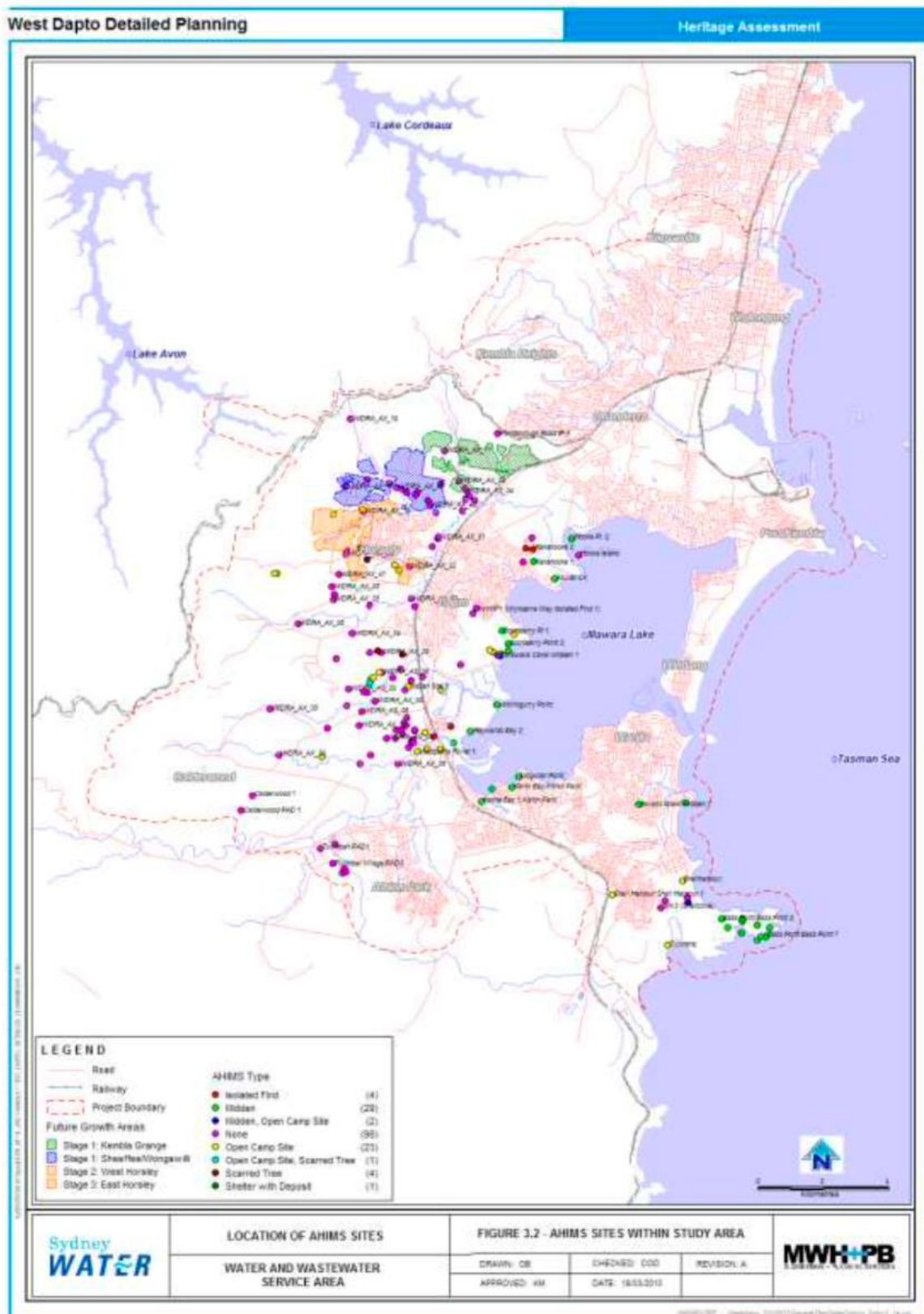


Figure 3.2 Registered AHIMS sites within the study area.

M1 Princes Motorway Climbing Lanes PACHCI Stage 2 Assessment (Artefact Heritage 2016)

Artefact Heritage were commissioned by Roads and Maritime Services (now Transport for New South Wales) for the proposed widening of the Princes Motorway at Mount Ousley, approximately 5km north of the study area. It was determined that much of the study area was heavily modified as a result of the construction of the Princes Highway and associated artificial embankments. Ground surface visibility in the study area was low except for vehicle tracks, eroded areas and outcropping sandstone. No previously recorded Aboriginal sites were located within the area and no areas of archaeological potential were identified. No further assessments were recommended for the proposal.

Aboriginal Cultural Heritage Due Diligence (Biosis 2017a)

Biosis completed an Aboriginal Due Diligence report for the Mount Kembla area approximately 6 km west of the current study area. During that assessment Biosis identified that the entire study area had low archaeological potential due to the entire area being subject to past land clearance for agricultural use, and that a large portion of the study area has been subjected to multiple flooding events. In addition, the steep nature of the landform pattern indicates that the study area would not have been an optimal site of potential occupation for Aboriginal people. The shallow soil landscapes present also indicated that the potential for cultural material and potential archaeological deposits to remain is low indicating that there is a low likelihood for potential archaeological deposits to be present within the study area due to the landforms and soil types.

The area was assessed to have low potential for Aboriginal objects due to the extensive ground disturbance that has occurred and its subjection to flooding.

European Heritage Archaeological Monitoring Report (Biosis 2017b)

An archaeological monitoring assessment was undertaken by Biosis in 2017 at 5 Harbour Street Wollongong approximately 2 km from study area. Although this assessment was focused on European heritage, the location of the works were in the immediate vicinity of the current study area and were consistent with the scope of works proposed for this study. The works involved monitoring the demolition of existing structures for the proposed development of a new dwelling at the property. The removal of the current structure, foundations and footings occurred, indicated that the structure had been built over natural soil profiles. The area had been subject to extensive disturbance from earlier twentieth century development. No Aboriginal artefacts were identified during the works.

Dendrobium Mine Aboriginal Cultural Heritage Assessment (Niche, 2018)

In 2018 Niche were commissioned by Illawarra Coal to prepare an Aboriginal Cultural Heritage Assessment of the Dendrobium Mine – Plan for the Future: Coal for Steelmaking project, which was located approximately 7 km west of the study area. The survey for the project focused on ridge and creek lines which had previously been identified as having archaeological potential in the area, with approximately 7% of the study area surveyed. Six previously unidentified sites were recorded, two of which were sandstone shelter sites with art, and four were grinding grooves within the creek bed. Each of the new recorded sites were assessed as having low significance and overall 49 of the 58 sites were assessed as having low significance. It was recommended that an Aboriginal Heritage Management Plan should be prepared for the project.

Port Kembla Gas Terminal (GHD 2018)

GHD prepared an Aboriginal Heritage Due Diligence assessment for the Port Kembla Gas Terminal in 2018, located approximately 6 km south of the study area. The area consists of a highly disturbed and industrialised landscape. However, the study noted that there is likely to be cultural material present on landscapes where the natural soil survives such as Spring Hill, but may also be present in disturbed contexts. The study identified that cultural material is likely to be present in close

proximity to the margins of the former Tom Thumb Lagoon as it was an important water source. The majority of the study area has been heavily modified, with little to no potential for Aboriginal archaeological deposits to survive.

4.3 Environmental background

4.3.1 Soils and geology

The study area is located within the Gwynneville soil landscape (Figure 16) located in the Wollongong Plain which reaches from Austinmer and Dapto to the lower portion of the Illawarra Escarpment between Coledale and Bong Bong Pass. The underlying geology is the Illawarra Coal Measures consisting of resistant inter bedded quartz lithic sandstone, grey siltstone and claystone, carbonaceous claystone, clay and laminate (eSPADE).

Soils are shallow (50 – 100 cm) Brown Podzolic Soils (Db1.11, Db3.11) and Xanthozems (Gn4.34) on upper slopes, Lithosols (Um1.43, Uc1.23) on simple slopes and shallow (<50 cm) Brown Earths (Uf6.13) on mid-slopes and lower slopes. Soil limitations include extreme erosion hazard, steep slopes, mass movement hazard, and local flooding. Subsoils are reactive and impermeable, with low wet bearing strength clay subsoils (eSPADE).

4.3.2 Landform and hydrology

The characteristic landform of the area is undulating to steep hills (local relief 10 – 70 m, slope gradients 3 - 25%). Landform elements include broad to moderate ridges (250 – 800 m), steeply inclined to moderately inclined foot slopes, and isolated rises on the coastal plain. This landscape is characterised by localised structural benches up to 80 m wide, localised bedrock outcrops and deep colluvial deposits (eSPADE).

The study area is located on the upper slope of a gentle rise which commences at 20m above sea level to the north side reaching 30m at in the vicinity of the study area; and beyond in a southerly directly until it descends again to 20m.

The study area is located approximately 662m south of an unnamed second order watercourse, which flows from Mount Keira to the northwest of the study area to Fairy Creek approximately 1.6m northwest of the study area. The study area is 700m north of another watercourse to the south (Figure 17).

4.3.3 Vegetation

In residential areas the original tall open-forest (wet sclerophyll forest) and open-forest (dry sclerophyll forest) have been extensively cleared. Remaining species include: bangalay, blackbutt, grey ironbark, swamp mahogany, forest red gum, spotted gum (Corrimal only), two-veined hickory and black wattle (eSPADE)

Figure 16. Location of study area in Gwynneville soil landscape

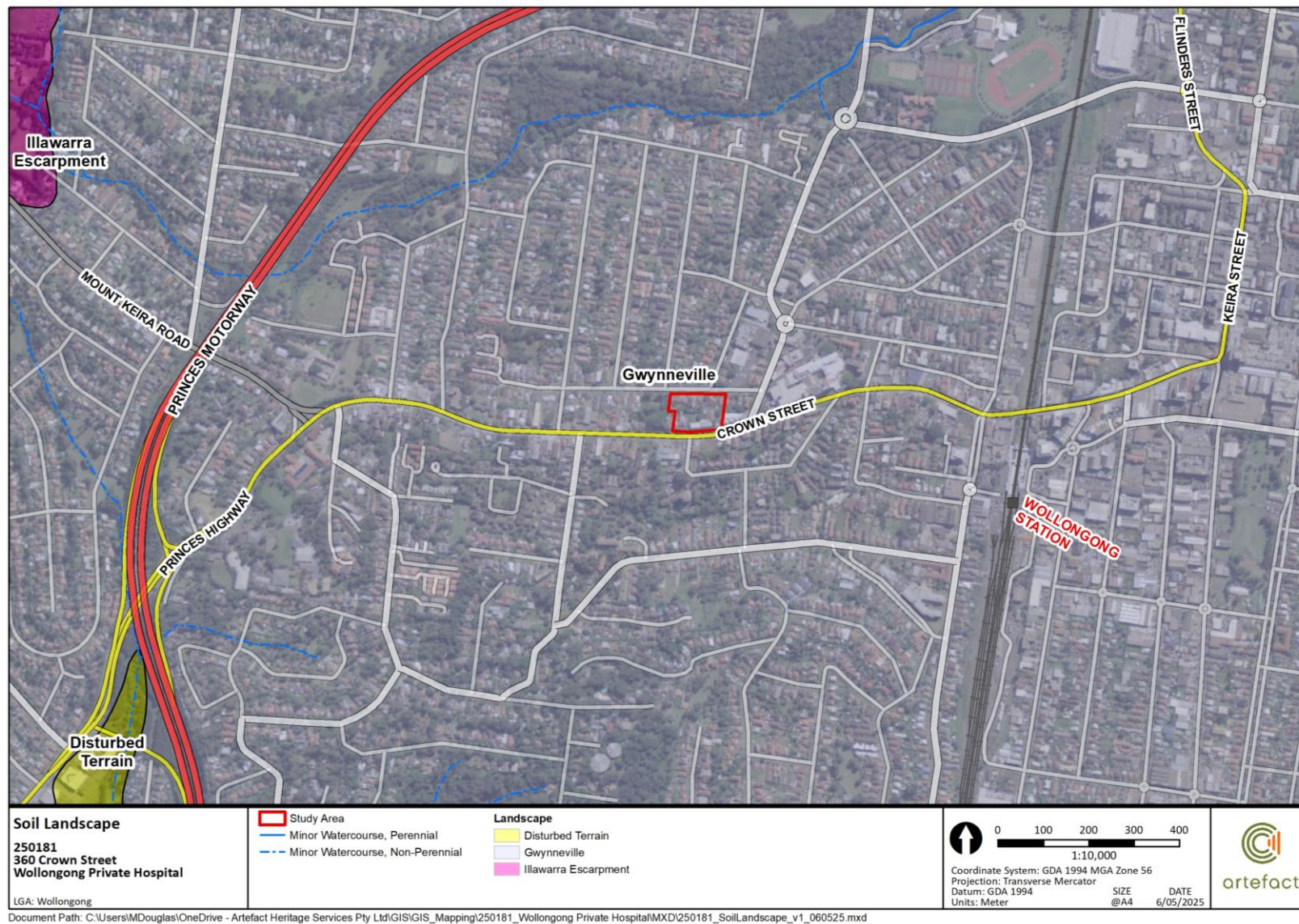
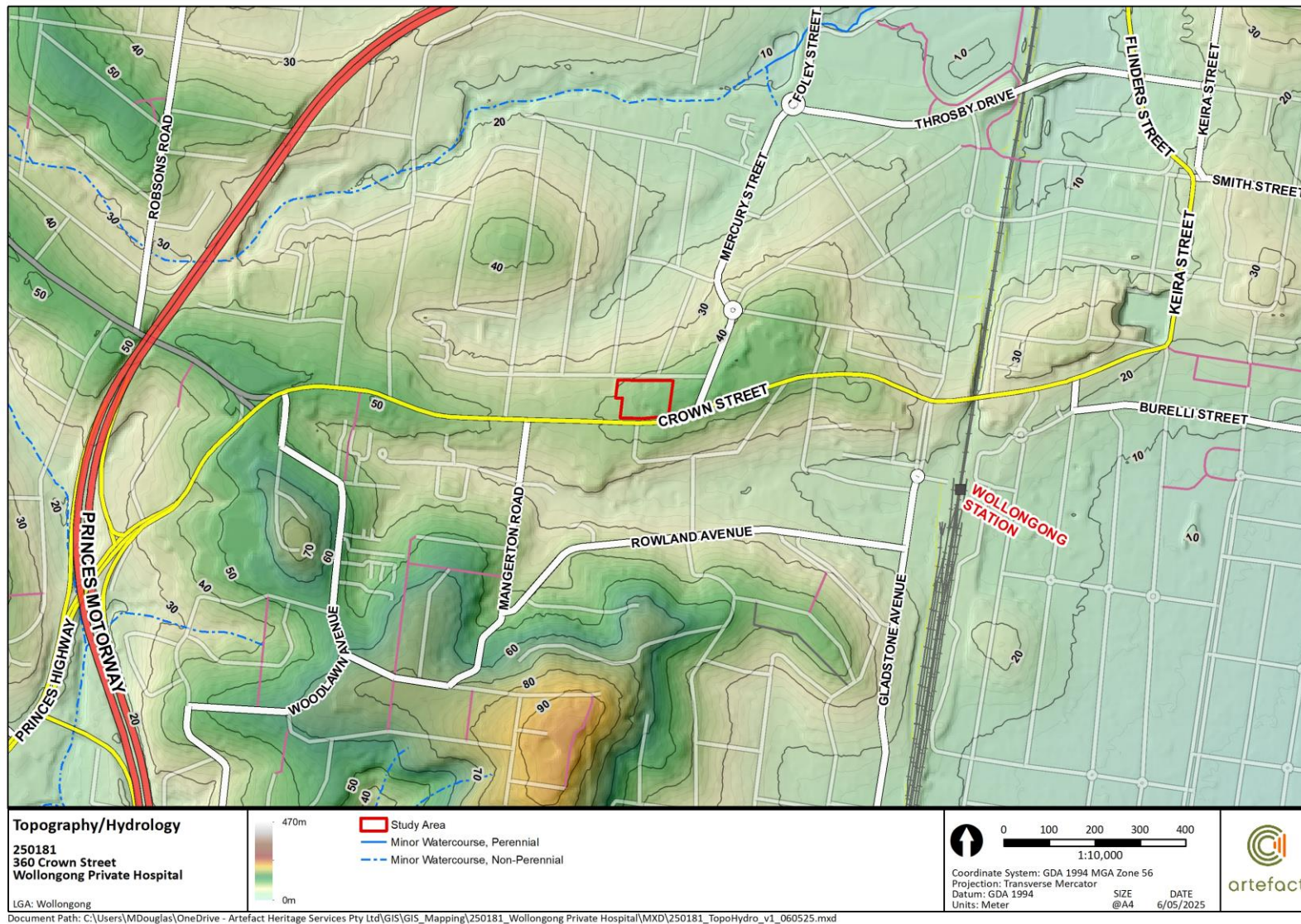


Figure 17. Location of study area to watercourses (source SixMaps)



4.3.4 European history and land use

The Illawarra district was first noted by Lieutenant James Cook in 1770 when he located the headland of Port Kembla, naming it 'Red Point' and another land point 'Hat Hill' (Mount Kembla). While news of Cook's arrival visit may have taken several years to reach the Illawarra region, it is possible that the Wodi Wodi may have known of European arrival prior to the settlement of the First Fleet and subsequent expansion throughout New South Wales.

The first recorded contact between the British and the Aboriginal people in the Illawarra area occurred in 1796 (McDonald 1966), when explorers, Bass and Flinders, sailed on a small boat called the 'Tom Thumb' along the south coast from Sydney and landed on what is known today as the Tom Thumb Lagoon. Here the explorers were observed by the Dharawal people, who watched them struggling to relaunch the vessel for several days. Eventually the Dharawal people took pity on them and offered them fish and water in exchange for potatoes and handkerchiefs, before guiding the boat through to Lake Illawarra to access freshwater (Donaldson et al. 2015).

European settlement in the Wollongong area began with the arrival of Dr. Charles Throsby. In 1815 Aboriginal guides possibly, Cookoogong and Dual or Bundle and Broughton, led Throsby down an ancient Dreaming track from the west, known today as Bulli Pass, to pastoral land where he built the first stockman's shanty and hut in Illawarra, near to what is now the corner of Harbour and Smith Streets (Kass 2010). The location of this settlement was in close proximity to a freshwater lagoon.

By 1816 large allotments of land were awarded to free settlers, and after notice from the Governor, promised allotments were to be surveyed in the area, resulting in 2100 hectares of Dharawal land being taken from the Aboriginal people. Thosby was given a land grant of 300 acres at Wollongong, then known as The Five Islands in 1819. The land was primarily used for grazing and cultivating with the Illawarra grasslands providing fodder for cattle (NSW OEH n.d.).

By 1828 Throsby had the best herd in the colony consisting of 9000 cattle, outnumbering human occupants of the region (Kass 2010). By this time Harbour Street (roughly 2km east of the study area) was a bush track leading to a beach from which small vessels from Sydney discharged their cargoes and picked up goods (McDonald 1966). By 1835 settlement had increased and a courthouse was constructed in the same year, later replaced in 1858 by a new one, where it remains today (Kass 2010).

Tensions between Aboriginal people and white settlers in the area emerged following on from the arrival of whaling and sealing ships to work the South Coast from 1801 and initiated more than 40 years of deadly violence in Dhurga country as alienation of traditional land increased and intensified conflict between the two persisted as part of the Forty Year War (Donaldson 2017). In 1822, Governor Lachlan Macquarie visited Illawarra where a crowd of approximately 100 Aboriginal people met him near the Tom Thumb lagoon (Donaldson 2017).

Work on road construction to access Sydney commenced in 1821 and in 1826 the name Wollongong was used for the first time and a military garrison established. First settlers established residences at Fairy Meadow in 1827, about 3-4 km north of the study area. Industrial development commenced with exploration of coal samples in 1828 alongside grain production and a whaling station was established at Bulli in 1831. A rail link to Sydney was established in 1888 to supplement connections already existing by road and sea. In the 1937 BHP purchased the mine at Mount Keira and introduced mechanical improvements to it, as well as at the mine in Wongawilli (AMBS 2010: 43).

As European exploration and settlement began to expand throughout the South Coast region, Europeans began to travel more regularly between Sydney and the South Coast, resulting in the spread of several introduced diseases, including chicken pox, influenza, measles, whooping cough, scarlet fever and typhoid fever (Donaldson et al. 2015). Within forty years of settlement, approximately two thirds of the Aboriginal population had died from smallpox alone. The birth rate

simultaneously lowered, resulting in the permanent loss of some 'clans' and languages (Donaldson 2015).

Historical imagery of the study area reveals that the site had been largely used for residential housing for some time. By 1951, the study area was within an extensive suburban development, with residential housings and vegetation largely cleared (Figure 18). By 1972 the current residential property layout distinguishable (Figure 19). In the eastern half of the site has been built over including a large building, presumably a hospital facility (where the Wollongong Private Hospital now stands) located on the south side of the study area, which would have required demolition of the pre-existing residential housing and gardens (Figure 20).

Figure 18. Study area in 1951 (NSW Historical Imagery)



Figure 19. Study area in 1972 update text (NSW Historical Imagery)



Figure 20. Study area in 2005 (NSW Historical Imagery)



4.4 Predictive model

AMBS's predictive model (2010: 40-41) found that the following site types were likely to be found in the West Dapto Urban Release area, which included Wollongong city and the study area:

- Artefact scatters and isolated finds (campsites): – these accounted for 36% of sites, most within 200 m of water
- Shell middens – these were likely to be present in the southern portion of the study area adjacent to Lake Illawarra and adjacent to the coastline
- PADs – these were recorded in the area, and there was a moderate-high potential for PADs to be present
- Modified Trees (Scarred or Carved) – there was potential for modified trees to be found where old growth vegetation remains
- Aboriginal Ceremonial Sites – recent recordings of these sites were rare, and there was low potential for additional ceremonial sites to be found
- Burial sites – often identified through oral history and historical records and reported at the time of the survey by Aboriginal representative, Allan Carriage, to be located along Mullet Creek (located approximately 10 km southwest of the study area). There is some potential for Aboriginal burials to be extant along Mullet Creek.

AMBS concluded that historical land use and disturbance has affected the presence of these site types (AMBS 2010: 31-32) within the WDURA, including:

- Mining – which has resulted in high disturbance of land, but its affects has been localised and not extensive. There is low archaeological potential in these areas (i.e. Mount Kembla and Mount Keira).
- Land clearance – the steep to very steep foothills of the southwest, between Avondale and Marshall Mount and the Escarpment) have been partially cleared for cattle grazing and small farm holdings. This has introduced the potential for slope slippage which affects the presence of finds in situ.
- Creek drainage – these alluvial deposits have been destroyed through the development of industrial land on the floodplains, especially between the foothills and Lake Illawarra, and the Mullet, Duck and Marshall Mount/Macquarie River creek systems. Closer to the study area, but at some 10 km removed, are the creek systems draining into Allan's Creek, Tom Thumb Lagoon and port Kembla Harbour.

AMBS stated that for the majority of the WDURA (not listed in the areas above):

Aboriginal sites...will be mostly subsurface and visible only where disturbed or unearthed. Even in areas built on or developed or filled, subsurface archaeological deposits may remain intact. There is a relative paucity of sites known for this unit and it is highly likely undisturbed artefact bearing deposits will be located in this

*unit. Sites that may be found below the alluvium will be of considerable antiquity
(Dallas and Sullivan 1995:19)*

In summary, AMBS divided the WDURA into three levels of archaeological sensitivity, predicated on the distribution of AHIMS sites, archaeological information, topography and aerial imagery. The study area is located within the large expanse marked in yellow - which designates low archaeological sensitivity - at the northern end of the WDURA and which includes the city area (Figure 21).

Figure 21. Area of low archaeological sensitivity (yellow) designated by AMBS (2010: 87) assessment of the WDURA in 2010. Study area is located by arrow

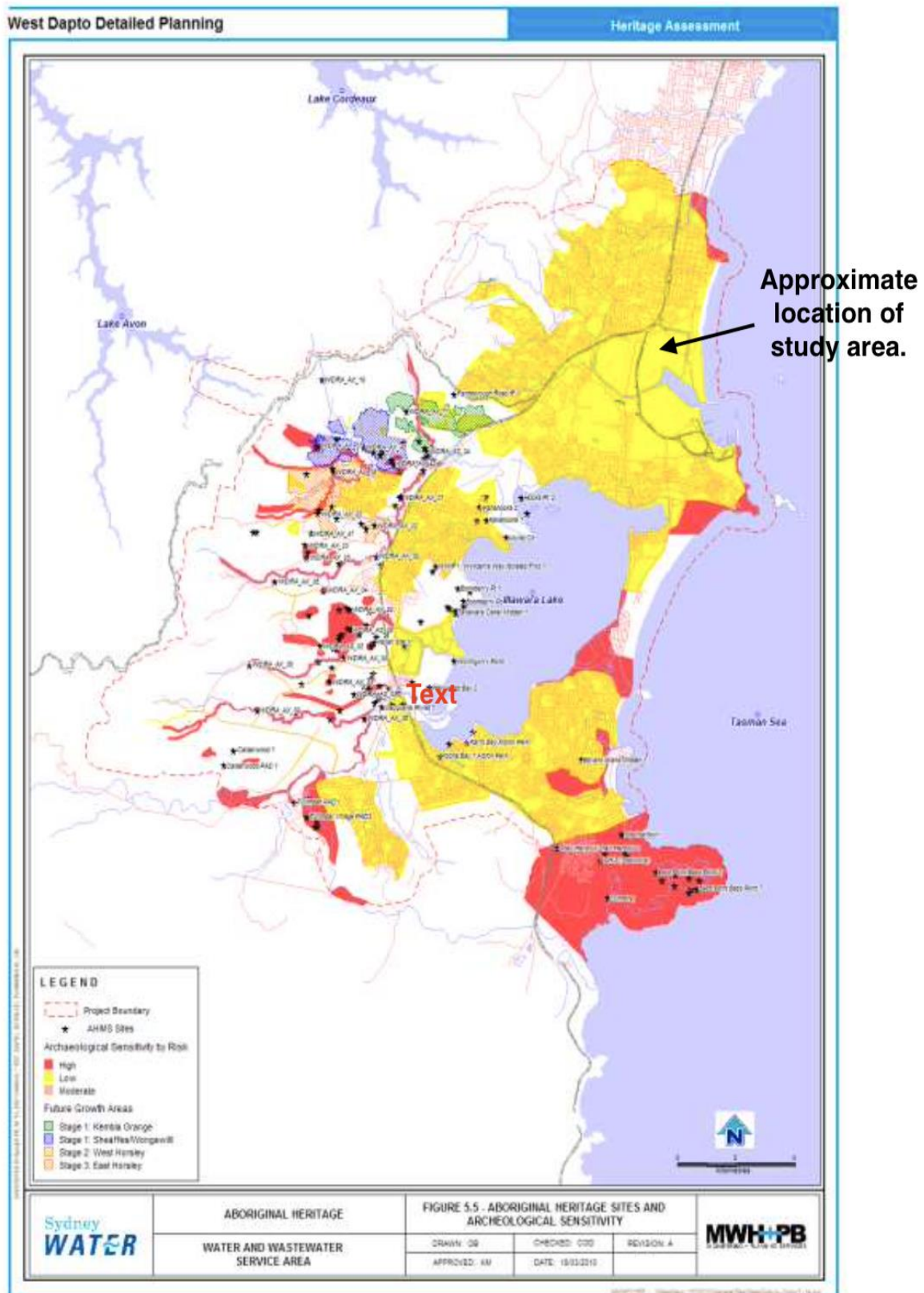


Figure 5.5 Identified Aboriginal heritage sites and areas of archaeological sensitivity in the study area.

5.0 SITE SURVEY METHODOLOGY (2022)

5.1 Aboriginal site definition

An Aboriginal site is generally defined as an Aboriginal object or place. An Aboriginal object refers to any deposit, object or material evidence (not being a handicraft) relating to Aboriginal habitation of the area that comprises New South Wales (DECCW 2010). Aboriginal objects may include stone tools, scarred trees or rock art. Some sites, or Aboriginal places, can also be intangible and although they might not be visible, these places have cultural significance to Aboriginal people.

The Code of Practice states, in regard to the definition of a site and its boundary, that one or more of the following criteria must be used when recording material traces of Aboriginal land use:

- The spatial extent of any visible Aboriginal objects, or direct evidence of their location
- Obvious physical boundaries where present, for example mound site and middens (if visibility is good), a ceremonial ground
- Identification by the Aboriginal community on the basis of cultural information

5.2 Archaeological survey methodology

5.2.1 Site inspection

A site survey was undertaken on foot by Michael Lever (Heritage Consultant, Artefact), Elizabeth Bonshek (Senior Heritage Consultant, Artefact), Tom Butler (Illawarra LALC) and Paul Bell (South Coast People) on Thursday 10 February 2022.

The study area consists of four residential properties (numbers 21, 19, 17 and 15) situated on Urunga Parade; two hospital properties (368 and 366 Crown Street) likely to have been residential before conversion to hospital spaces and the hospital building (at 360 Crown Street). Access to number 19 Urunga Parade was not granted and so is not covered in this survey.

The study area is situated on the upper slope of a hill, with land descending east to west at approximately 5–10% gradient (Figure 22). On Urunga Road, the land rises from the street towards the south (Figure 23) while on Crown Street, the land rises northwards (Figure 24), to form what would have been the ridgeline of the hill. The top of the hill is located further east.

5.2.1.1 Survey Unit 1. Wollongong Private Hospital

The hospital covers approximately half of the study area. It has multiple stories including an underground car park with entrance and exit on Urunga Parade and Crown Street. The eastern boundary abuts the neighbouring property and is not passable to its full extent; the front entrance of the building (Crown Street) is a tiled open area, with raised garden beds, which extend to the perimeter of the boundary (Figure 25). A ground level parking space is located near the pedestrian entrance (Figure 27) from which access to the underground parking areas and an access point from Urunga Parade is visible (Figure 26). Service infrastructure is located around the perimeters, for example the fire hydrant system visible in Figure 28.

There are no areas of natural soil in this part of the study area. The land has been excavated to a considerable depth to accommodate the car park and infrastructure. All areas of vegetation were curated and plants contained within landscaped borders or raised constructed beds.

There was no evidence of original soil, landform or vegetation in the part of the study area. No artefacts were found in this part of the study area.

5.2.1.2 Residential and hospital clinical rooms/office spaces

The clinical services / offices spaces at 368 and 366 Crown Street appeared to be converted residential buildings. The areas surrounding the building at both properties had been converted to car parking space (for example Figure 29 and Figure 30 and Figure 33). These carparks were on levelled surfaces which had cut into the original landform (Figure 34).

Small areas of vegetated areas, including a grass lawn at lawn were landscaped to the boundary on Crown Street and did not contain any original plants (Figure 32). The rear of 368 Crown Street also functioned as a carpark having been cemented over (Figure 33). Landscaped gardens and grassy verges did not reveal original soils and included introduced gravel fill.

The residential properties on Urunga Parade varied in size. Number 17 was an apartment block (Figure 23) and had extensive sealed areas front and back and small grass lawn with unkempt garden beds on three sides; a patch of exposed soil revealed a sandy, gravel mix with leaf debris (Figure 35 and Figure 36).

The back area of number 15 had also been sealed to allow improved access for vehicles and a gravel patch was evident (Figure 37) along with poorly kept weedy garden beds offering poor visibility (Figure 38). The front area had been terraced to provide a flat lawn area, with zero visibility of soil (Figure 39).

Number 21 Urunga Parade was the largest block within the study area. It also had a terraced front garden to control slope, and a second courtyard area cut into the slop at the back. It is possible that the slope in the back, running west to east, and possible entering number 19 (which was not accessible) might represent a natural slope (Figure 40). Rocky outcrops were present at the southern boundary, on the gentle slope. These did not show evidence of engravings or grinding grooves. One area appeared to have been chiselled (Figure 41).

No Aboriginal artefacts were discovered in the properties in Urunga Parade. Visibility ranged from zero in areas of grass lawns and garden beds which were well kept, but also in degraded lawn areas which had died leaf and grass matter on the surface. Exposed areas of ground provided evidence of gravel and imported materials.

Figure 22. View east to west down Urunga Parade, hospital in form ground left residential houses to rear of hospital.



Figure 23. Ascent of driveway (north to south towards Crown Street) at 17 Urunga Parade.



Figure 24. Ascending (south to north) driveway, concreted, at 368 Crown Street.



Figure 25. Front of the hospital on Crown Street, showing tiled area which extends throughout the pedestrian access areas of the building



Figure 26. Ground floor parking to left of image, underground parking access in middle of image, glass doors of pedestrian access to right of image.



Figure 27. Car park on round floor, with view of rear of residential house located on Urunga Street study area to rear of image.



Figure 28. Fire hydrant system located on the boundary of the hospital with property number 366 Crown Street.



Figure 29. Front of 366 Crown Street, with front area converted into a carpark with sealed surface.



Figure 30. Rear of 366 Crown Street, with gravel car park.



Figure 31. 366 Crown Street, verge consisting of grass lawn and gravel. Hospital to right of image.



Figure 32. Landscaped areas at the front of 368 Crown Street.



Figure 33. Rear of 368 Crown Street, with cement carpark on levelled surface.



Figure 34. Illustration of height difference between property, 368 Crown Street to right.



Figure 35. Back area of 17 Urunga Parade, with exposed patches of exposed soil (detail in figure 24) on ground and in garden beds.



Figure 36. Detail of soil at 17 Urunga Parade.



Figure 37. Gravel patch and grass at rear of 15 Urunga Parade.



Figure 38. Garden bed at 15 Urunga Parade, poor visibility of soils

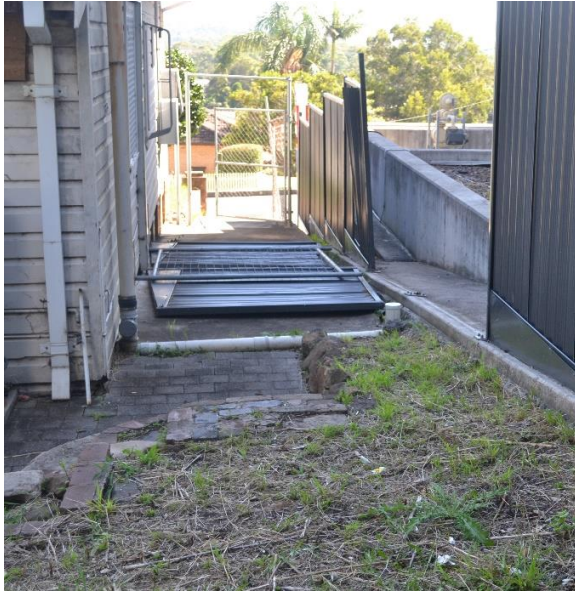


Figure 39. Front of 15 Urunga Parade, with zero visibility of soil and terracing of lawn.



Figure 40. Gentle slope (west to east) at the rear of 21 Urunga Parade, and the modification to the slope at the retaining wall to create a tiled courtyard.



Figure 41. Rocky outcrops were present at adjacent to the property fence at the rear (southern boundary) and located on the gentle slope.



Summary

No artefacts were found within the study area. Overall ground visibility in this area was very low, as the ground was either built upon, surfaced for car parking, or curated through garden beds. The ground at the hospital was highly disturbed due to construction and excavation works including underground parking. The apartment building at number 17 would also have required subsurface excavation.

Stone outcrops, characteristic of the Gwynneville Landscape were present at Number 21 Urunga Road. These outcrops did not show any signs of Aboriginal activity in the form of engravings. It was the view of the Illawarra LALC and South Coast People representatives that these outcrops were not original to the site.

Overall, the land in the study area was considered to be disturbed and to have a nil-low archaeological potential. Property 19 Urunga Road was excluded from the assessment.

5.2.2 Aims of archaeological survey

The aims of the archaeological survey were to:

- Inspect the ground surface of the site
- Record any surface or potential subsurface Aboriginal sites that have not been recorded in AHIMS
- Identify areas of PAD that may be present in areas that have had no or minimal disturbance
- Collect information to ascertain whether further archaeological investigation is required.

Results

Archaeological potential is closely related to levels of ground disturbance in the area. Other factors are also taken into account, such as whether artefacts were located on the surface, and whether the area is within a sensitive landform unit according to the predictive statements for the area. The potential for discovering artefacts lies in landforms which have been subject to a light to moderate disturbance.

In summary, the study area was assessed as having nil-low archaeological potential based on the following:

- No Aboriginal sites are located within the study area
- There are no registered Aboriginal sites in close proximity to the study area. The three sites within 1.5 km of the study area include: artefacts found in previously cleared and excavated land, and were not found in situ (AHIMS ID 52-2-4498); or were possibly found in fill (AHIMS ID 52-2-3618) or documented through oral history (AHIMS ID 52-2-3199 a ceremonial site)
- The study area is located in an area designated by the AMBS (2010) predictive model as holding low archaeological potential being within the northern parts of WDURA which has experienced historical disturbance through clearance and successive construction works.
- The study area has supported residential housing, parts have been rebuilt upon and modified through landscaping, since at least the 1940s. Substantial subsurface excavation on the eastern side of the study area for the construction of the current hospital will have caused extensive damage to original soils. The construction of an apartment building at number 17 Urunga Parade, replacing the original residential housing, would also have required subsurface earthworks.
- The historical images, especially that of 1951, show open areas denuded of original vegetation with residential houses established. Land clearance occurred prior to the 1940s, and the history of the development of Wollongong testifies to land modification projects since the nineteenth century.
- The study area is located on the upper slope of hill and is neither on a ridge line or within 200 m of a watercourse.

5.3 Archaeological survey coverage

The study area was covered in two survey units:

- Survey Unit 1. Wollongong Private Hospital (east)
- Survey Unit 2. Residential and hospital clinical rooms/office spaces (west).

Both units were located on the upper slope of a rise. The total area of the study area is 8623m². However, there was no access to number 19 Urunga Parade.

There was no natural ground surface within Survey Unit 1 as the hospital covers the entire footprint of the eastern part of the study area, and any plantings/vegetation were contained in above ground containers where soils were not original. Ground surface visibility was 0% and exposure was 0%.

Ground surface visibility in Survey Unit 2 was poor, being around 10 to 20% due to the presence of lawn, gardens, driveways and carparks in addition to residential buildings and fill. Exposure was 15%.

Table 7).

Table 6 presents a summary of the level of visibility and exposure at the site to determine the effective coverage of the study area and takes into consideration the effective coverage of the landform.

The effective coverage of the Survey Unit 1. Wollongong Private Hospital (east) was .99%, while the effective coverage of Survey Unit 2. Residential and hospital clinical rooms/office spaces (west) was 1.5%.

The Landform survey coverage is presented in (Table 7).

Table 6. Effective survey coverage

Survey unit	Landform	Survey unit area (sq. m)	Visibility (%)	Exposure (%)	Effective coverage area (sq. m)	Effective coverage (%)
1	Slope-East	4978	0	0	0	0%
2	Slope-West	3645	15	15	142	3.8%

Table 7. Landform survey coverage

Landform	Landform area (sq. m)	Area effectively surveyed (sq. m)	% of landform effectively surveyed	Number of sites identified
1. Slope-East	4978	0	0	0
2. Slope-West	3645	142	3.8	0

6.0 ADDITIONAL SITE SURVEY (2025)

Following an update to the study area in 2025, in which 23 Urunga Parade (Lot 46 DP 5507) was included into the scope of the works, an additional site survey was completed on 28 May 2025 by Samuel Sammut (Senior Heritage Consultant, Artefact Heritage) and Neve Penklis (Graduate Heritage Consultant). A survey of 19 Urunga Parade (Lot A DP 343680), which could not be inspected in 2022 during the original site survey, was also completed. Both residential properties were untenanted and only the outdoor areas of each property were inspected.

23 Urunga Parade (Lot 46 DP 5507)

The survey demonstrated that the property was located on a moderately inclined slope that descended east to west, and which had been modified including flattening and terracing for the construction of the house (Figure 42 to Figure 44). Localised ground disturbance was observed in the property and included: brick footings under the house, multiple underground services, a garage and two sheds (one was covered by thick vegetation) (Figure 45 to Figure 50). However, as the garage and sheds had concrete floors, the ground disturbance was likely shallow and may have not impacted deeper subsurface deposits. The backyard contained introduced fill that consisted of gravels, in which a brown soil was observed underneath (Figure 50 and Figure 51).

No Aboriginal objects or potential for Aboriginal objects were observed during the site survey.

Figure 42: Moderately inclined slope (west to east) (east view)



Figure 43: Moderately inclined slope (west to east) (west view)



Figure 44: 23 Urunga Parade – front of property (south view)



Figure 45: Built surfaces on eastern side of property (south view)



Figure 46: Brick footings underneath house



Figure 47: Multiple underground services in exposed soil within property



Figure 48: Garage with concrete floor in the southeastern corner of property



Figure 49: Rear view of 23 Urunga Parade (north view)



Figure 50: Introduced fill within rear of property (southwest view). Note sheds hidden behind vegetation in the southwest corner



Figure 51: Brown soils underneath gravel fill



19 Urunga Parade (Lot A DP 343680)

This property was situated on the same slope as Lot 46 DP 5507 but was located slightly further up the incline. Similarly, the slope had been flattened and terraced but to a greater extent for the construction of the property (Figure 52). There was evidence of slope cutting within the property as the garage on the western side of the house sat much lower than the eastern side of the house, and

within the rear of the property on the western side, the neighbouring property sat much lower than the study area (Figure 52 to Figure 54). Localised ground disturbance was observed in the property including: a concrete driveway, multiple underground services, a footpath, shed and concrete edging at the rear of the property (Figure 53 to Figure 56). However, these would have likely cause shallow ground disturbance and may have not impacted deeper subsurface deposits. The property had limited visibility at the rear of the property and only a brown topsoil was observed (Figure 57).

No Aboriginal objects or potential for Aboriginal objects were observed during the site survey

Figure 52: 19 Urunga Parade – front of property showing modified, flattened slope (south view)

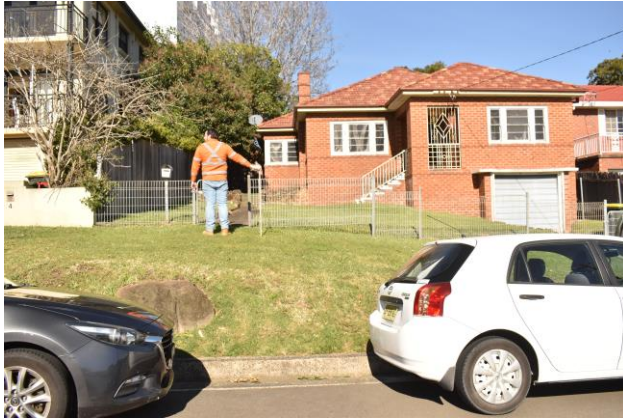


Figure 53: Terracing within front of property (east view)

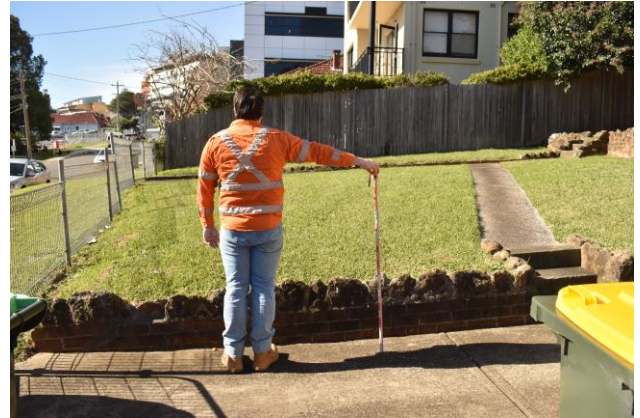


Figure 54: Terracing in back yard showing. Note neighbouring property is much lower



Figure 55: Underground services within front yard of property



Figure 56: 19 Urunga Parade – backyard from rear of house



Figure 57: Limited exposure in the rear of property





7.0 SIGNIFICANCE ASSESSMENT

7.1 Significance assessment methodology

An assessment of the cultural heritage significance of an item or place is required in order to form the basis of its management. *The Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011) provides guidelines for heritage assessment with reference to the *Burra Charter* (Australia ICOMOS 2013). The assessment is made in relation to four values or criteria (Table 8). In relation to each of the criteria, the significance of the subject area should be ranked as high, moderate, or low.

Cultural heritage consists of places or objects, that are of significance to Aboriginal people. Cultural heritage values are the attributes of these places or objects that allow the assessment of levels of cultural significance.

Assessing the cultural significance of a place or object means defining why a place or object is culturally important. It is only when these reasons are defined that measures can be taken to appropriately manage possible impacts on this significance. Assessing cultural significance involves two main steps, identifying the range of values present across the study area and assessing why they are important.

Social/cultural heritage significance should be addressed by the Aboriginal people who have a connection to, or interest in, the site. As part of the consultation process the Aboriginal stakeholders were asked to provide information on the cultural significance of the study area. Information on consultation with Aboriginal stakeholders for the project is provided in Section 3.1.

Table 8. Burra Charter Heritage significance criteria

Criterion	Description
Social	The spiritual, traditional, historical or contemporary associations and attachments the place or area has for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them. Does the subject area have strong or special association with the Aboriginal community for social, cultural or spiritual reasons?
Historic	Historic value refers to the associations of a place with a historically important person, event, phase or activity in an Aboriginal community. Is the subject area important to the cultural or natural history of the local area and/or region and/or state?
Scientific	This refers 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 values will be gathered through any archaeological investigation carried out. 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?

Criterion	Description
Aesthetic	This refers to the sensory, scenic, architectural and creative aspects of the place. It is often linked with the social values. It may consider form, scale, colour, texture and material of the fabric or landscape, and the smell and sounds associated with the place and its use. Is the subject area important in demonstrating aesthetic characteristics in the local area and/or region and/or state?

In addition to the four criteria, Heritage NSW (OEH 2011; 10) requires consideration of the following:

- 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?

7.2 Socio/cultural significance

Socio/cultural heritage values should be addressed by Aboriginal people who have a connection to, or interest in, the area.

No specific socio/cultural values for the study area were identified.

7.3 Historic significance

Historic values refer to the association of place with aspect of Aboriginal history. Historic values are not necessarily reflected in physical objects, but may be intangible and relate to memories, stories, or experiences.

No specific historic values for the study area were identified.

7.4 Scientific significance

Scientific values refer to a site's potential to contribute to our current understanding and information.

As there are no archaeological values in the site, there is no scientific significance.

Table 9. Scientific significance assessment

Site Name (AHIMS ID)	Research potential	Representativeness	Rarity	Education potential	Overall significance assessment
No AHIMS sites	None	None	None	None	None

7.5 Aesthetic significance

Aesthetic values refer to the sensory, scenic, architectural, and creative aspects of the place. These values may be related to the landscape and are often closely associated with social/cultural values. As the subject site is located within a developed agricultural setting, much of the aesthetic significance is lost.

No specific aesthetic values for the study area were identified.

7.6 Statement of significance

The RAPs did not identify any socio/cultural, historical or aesthetic values associated with the study area. There is no archaeological significance associated with the study area.

8.0 AVOIDING AND MINIMISING HARM

8.1 Proposed works

The proposed extension will incorporate a new emergency department, new outdoor spaces, courtyards, café, 3-level Medi Hotel, a new consulting building connecting into the Private Hospital and a proposed dedication of 366 & 368 Crown Street to the Illawarra Aboriginal Medical Services (IAMS).

The proposed works include:

- An expansion of underground parking
- An expansion of facilities on the underground level floor such as:
 - Retail outlets
 - Parking
 - Plant rooms
 - Public amenities
 - Medical equipment (LINAC machine).
- An expansion of facilities on the ground floor such as:
 - Public amenities
 - Emergency department and associated facilities
 - Ambulance bays
 - Main lobby
 - Retail outlets

The proposed expansion of the facility is illustrated in Figure 2 to Figure 9

8.2 Impact assessment methodology

The definition of harm to an object or place under the NPW Act includes any act or omission that 'destroys, defaces or damages the object or place or in relation to an object –moves the object from land on which it had been situated.' Direct harm may occur as a result of activities which disturb the ground surface including site preparation activities, earthworks and ground excavation, and the installation of services and infrastructure.

Indirect harm for Aboriginal heritage refers to impacts that may affect sites or features located immediately beyond or within the area of the proposed works. Indirect harm may include impacts from vibration, increased visitation, or increased erosion, including ancillary project activities (construction and/or operation) that are not located within the study area.

8.3 Aboriginal heritage impact assessment

There were no Aboriginal objects identified in the survey area, and no sites identified in the AHIMS database. Therefore, this report has assessed that there would be no impact on Aboriginal heritage at the study area.

8.4 Ecological Sustainable Development principles

In accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales*¹, the principles of ecologically sustainable development have been considered in preparation of this Aboriginal heritage assessment, including options to avoid impacts to Aboriginal cultural heritage, assessment of unavoidable impacts, identification of mitigation and management measures, and taking account of Aboriginal community views. The principles of ecologically sustainable development are detailed in the NSW *Protection of the Environment Administration Act 1991*. Principles of ecologically sustainable development relevant to the assessment of the project as it relates to Aboriginal cultural heritage are considered below.

8.4.1 The integration principle

Decision making processes should effectively integrate both long term and short term economic, environmental, social and equitable considerations (the 'integration principle'). The preparation of this ACHAR demonstrates regard for the integration principle by considering Aboriginal heritage values and impacts to these from the proposal during its planning phase. The nature of the proposal is in itself one that contributes to the long term economic and social needs of current and future residents of the area.

8.4.2 The precautionary principle

If there are threats of serious or irreversible environmental damage, lack of full scientific confidence should not be used as a reason for postponing measures to prevent environmental degradation (the 'precautionary principle').

As no archaeological sites were identified in the study area, no further archaeological investigation is recommended.

8.4.3 The principle of intergenerational equity

The proposed works would adhere, as close as possible, to the principle of intergenerational equity by collating scientific and cultural information on former Aboriginal occupation of the study area through the previous investigations and this ACHAR.

This report has assessed that no further archaeological investigations through test excavations need be conducted. However, the proposal should implement an unexpected finds policy, see Unexpected Finds below.

¹ Office of Environment and Heritage 2011

8.5 Cumulative impacts

A cumulative impact is an impact on Aboriginal cultural heritage resulting from the incremental impact of the action/s of a development when added to other past, present and reasonably foreseeable future actions. As the proposed works would not impact Aboriginal heritage, no cumulative impacts can occur.

9.0 MANAGEMENT AND MITIGATION MEASURES

9.1 Ongoing consultation with registered Aboriginal parties

Following the Unexpected Finds Policy (UFP) below, consultation with Aboriginal parties would continue as part of the consultation that accompanies the unexpected finds procedures.

9.2 Unexpected finds

A UFP would be implemented in the event of any unexpected finds of Aboriginal sites, objects, or archaeological deposits being identified during construction.

An unexpected archaeological finds policy would involve the following actions:

- Stop work within the affected area, protect the potential archaeological find, and inform environment staff or supervisor
- Contact a suitably qualified archaeologist to assess the potential archaeological find
- If Aboriginal archaeological material is identified, works in the area should cease, and NSW Heritage should be informed. Further archaeological mitigation may be required prior to works recommencing
- If human remains are found:
 - Immediately cease all work at the particular location
 - Notify site manager and project archaeologist
 - Notify NSW Police
 - Notify Heritage NSW on the Environment Line 131555 as soon as practicable and provide details of the remains and their locations
 - Notify the Illawarra LALC, the South Coast People and the Registered Aboriginal Parties who participated in the consultation process for the ACHAR.

10.0 CONCLUSIONS AND RECOMMENDATIONS

The following results and recommendations are based on consideration of:

- The requirements of Aboriginal heritage guidelines including:
 - *The Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010a) – known as The Code of Practice
 - *Guide to investigating and assessing and reporting on Aboriginal Cultural Heritage in New South Wales* (OEH 2011) – known as ACHAR guidelines.
 - *The Aboriginal Cultural Heritage consultation requirements for proponents 2010* (OEH 2010b)- known as Consultation Guidelines)
- The project SEARs
- The results of the stakeholder consultation
- Extensive search of the AHIMS database
- In depth background research and assessment following and an archaeological site survey.

The assessment found that:

- No sites listed on the Aboriginal Heritage Information Management System (AHIMS) were discovered in the study area
- No previously unrecorded Aboriginal sites or objects were identified within the study area during the site inspection.
- After physical examination of the study area and examination of historical aerial photography the study area has been assessed as being disturbed having nil to low potential to retain intact archaeological deposits
- Consultation with Registered Aboriginal Parties (RAPs) did not reveal specific social, cultural aesthetic or historical significance associated within the site.

Recommendations

Based on the results of this assessment and in accordance with Aboriginal heritage guidelines mandated in the SEARs for the proposal, the following recommendations are made:

- As the study area was found to be disturbed and to have a nil-low potential for Aboriginal objects to be located within it, it is recommended that further archaeological assessment is not required.
- As no specific social, cultural aesthetic or historical significance associated with the site was revealed, further consultation is not required unless unexpected objects are found during works.

- If changes are made to the proposal that may result in impacts to areas not assessed by this ACHAR further assessment would be required.
- Unexpected Aboriginal objects remain protected by the *National Parks and Wildlife Act 1974*. If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find/s and Heritage NSW and Illawarra LALC, South Coast People and the Registered Aboriginal Parties participating in the consultation process must be notified.
- If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity should cease, the site should be secured, and NSW Police and Heritage NSW should be notified along with the Illawarra LALC, South Coast People and the Registered Aboriginal Parties who participated in the consultation process for the ACHAR.

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12.0 APPENDIX – CONSULTATION RECORDS



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