



St George Private Hospital Expansion Kogarah

Aboriginal Cultural Heritage Assessment

Final

November 2025



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Final

Prepared by
Umwelt (Australia) Pty Limited

On behalf of
Akalan Projects Pty Ltd

Project Director: Luke Wolfe
Project Manager: Melissa Moritz
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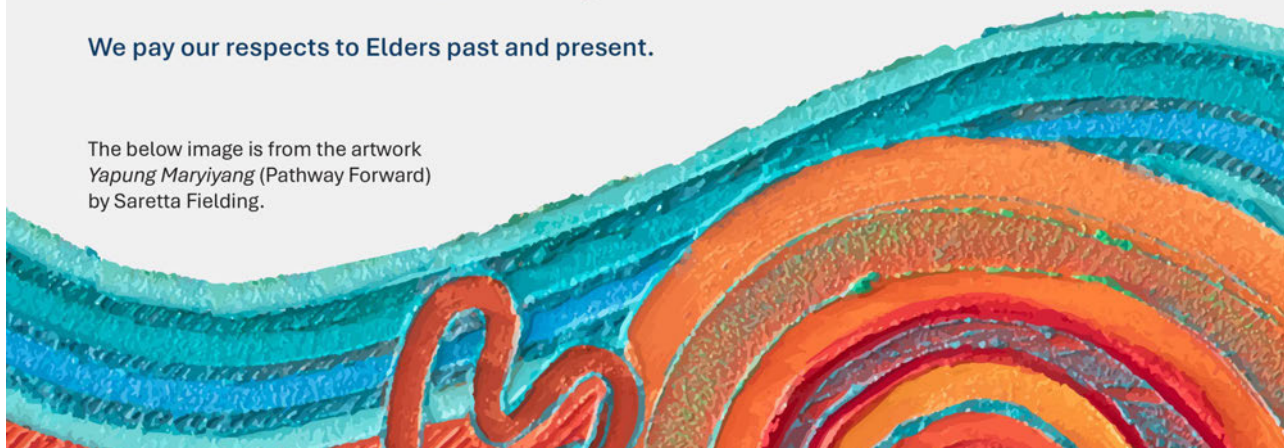
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Acknowledgement of Country

Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky.

We pay our respects to Elders past and present.

The below image is from the artwork *Yapung Maryiyang* (Pathway Forward) by Saretta Fielding.



WARNING: Aboriginal and Torres Strait Peoples are advised that this report contains images and written accounts of Aboriginal people who have died.

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Document Status

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V3	Melissa Moritz	5/11/2025	Melissa Moritz	5/11/2025

Executive Summary

Akalan Projects Pty Ltd (Akalan) propose the redevelopment and upgrade of existing facilities at St George Private Hospital as well as the construction of a new 7-storey clinical tower on Hogben Street (the Project), both located in Kogarah, New South Wales. The Project proposes the expansion of the existing facilities at St George Private Hospital (**Figure 1.2**), including the creation of an emergency department and additional operating theatre facilities within the existing building envelope. Also proposed is the construction of a new 7-storey Clinical Tower positioned opposite St George Private Hospital between South Street and Hogben Street, which will connect with the main hospital campus through a link bridge.

Umwelt was engaged to prepare an Aboriginal Cultural Heritage Assessment (ACHA) as part of the Project's Environmental Impact Statement (EIS) to be prepared by Akalan. The Project is classified as State Significant Development (SSD) (SSD-86969958) and will require development consent under *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP) and Part 4 of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act).

Umwelt's assessment was completed in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (Code of Practice) (DECCW, 2010b) (Code of Practice) and Section 3.1 of the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH [former], 2011). A program of Aboriginal community consultation was undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Consultation Requirements) (DECCW, 2010a).

Field Surveys

Survey of the Project Area identified an entirely modified landscape. Nearly all of the Project Area represents existing infrastructure in the form of buildings or concrete and bitumen roads and pathways. The topography of the Project Area was observed to be flat to gently sloping with gentle undulations being particularly noticeable at the parking lot in the northern-most portion of the Project Area. The parking lot was observed to be at a higher elevation than the adjacent Princes Highway running along the eastern boundary of the Project Area, and was likely the result of excavation works to facilitate a flatter aspect for the road than the building up of the ground surface in the construction of the parking lot.

Vegetation patterns were entirely ornamental plantings, particularly towards the northern boundary of the Project Area. Observed plants included mature native She-oak (*Casuarina cunninghamiana*) and exotic hedges along the northern boundary of the Project Area. Exotic grasses parallel the pedestrian footpaths surrounding the Project Area.

Survey of the Project Area identified no new Aboriginal sites.

Management Recommendations

Aboriginal Cultural Heritage Awareness Induction

All relevant contractors and personnel should also be made aware of their legal responsibilities under the *National Parks and Wildlife Act 1974* (NPW Act) and the need to avoid impacts to Aboriginal objects and/or sites not identified in this ACHA.

Previously Unrecorded Aboriginal Objects and/or Sites

Management strategies relating to the identification of unrecorded Aboriginal archaeological objects and/or sites identified within the Project Area throughout the life of the Project will comprise the following procedure:

- All works would cease immediately in the area to prevent any further impacts to the object(s).
- Notify the appropriate Akalan Environmental Manager and/or Project Manager immediately.
- A qualified heritage consultant would be engaged to determine the nature, extent and scientific significance of the object(s). RAP representatives are to be notified in writing regarding the nature of the find and if required, proposed management actions. RAP representatives will be requested to provide comments within seven (7) days.
- An AHIMS site card would be completed and submitted to Heritage NSW in compliance with Section 89A of the NPW Act. The site cards will be lodged within 21 days and a copy provided to those RAPs who wish to have a copy.
- An Aboriginal Cultural Heritage Management Plan (if required as part of the Conditions of Consent) and any other Project environmental management systems or databases would be updated (as relevant) to address the new Aboriginal site.

Human Skeletal Remains

In the event that potential human skeletal remains are identified throughout the life of the Project (including construction, operations and decommissioning phases), the following standard procedure outlined below will be followed:

- All work in the vicinity of the remains must cease immediately.
- The location must be cordoned off and the appropriate authorities notified (including NSW Police and if considered of possible Aboriginal descent, NSW Heritage).
- Subject to any alternative instruction from the NSW Policy or Heritage NSW, a physical or forensic anthropologist would be commissioned to inspect the remains *in situ* and make a determination of ancestry (Aboriginal or non-Aboriginal) and antiquity (pre-contact, historic or modern).
- Subsequent management actions will be dependent on the findings of the inspection undertaken under Point 3.
- If the remains are identified as modern and human, the area will become a crime scene under the jurisdiction of the NSW Police.
- If the remains are identified as pre-contact or historic Aboriginal, the site will be secured, and Heritage NSW and all RAP representatives notified in writing.
- If the remains are identified as historic (non-Aboriginal), the site is to be secured and the Heritage NSW contacted.
- If the remains are identified as non-human, work can recommence immediately.

RAP Recommendations

- To ensure spiritual wellbeing of the environment, it would be preferable for soils and sediments excavated as part of ground disturbance in the construction of the clinical tower to be reused locally, rather than being permanently removed off-site.
- Local Aboriginal knowledge should be incorporated as design elements as the Project is completed. Examples provided included art sourced from local Aboriginal artists depicting local Aboriginal stories. It is recommended that Akalan reference the *Connecting with Country Framework* (Government Architect NSW, 2023) in the design and operational phases of the Project.

Abbreviations

Abbreviation	Definition
ACHA	Aboriginal Cultural Heritage Assessment
ACHMP	Aboriginal Cultural Heritage Management Plan
Consultation Requirements	<i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i>
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
Akalan	Akalan Projects Pty Ltd
ANM	Australian National Museum
CBD	Central business district
Code of Practice	<i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i>
DP	Deposited plan
DPHI	Department of Planning, Housing and Infrastructure
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
IBRA	Interim Biogeographic Regionalisation of Australia
ILUA	Indigenous Land Use Agreement
LALC	Local Aboriginal Land Council
LEP	Local Environment Plan
LGA	Local government area
LGM	Last glacial maximum
LLS	Local Land Services
NNTT	National Native Title Tribunal
NPW Act	<i>National Parks and Wildlife Act 1974 (NSW)</i>
NPWS	National Parks and Wildlife Service
NSW	New South Wales
NTSCORP Limited	Native Title Services Corporation Limited
Planning Systems SEPP	<i>State Environmental Planning Policy (Planning Systems) 2021</i>
RAPs	Registered Aboriginal Parties
SEARs	Secretary's Environmental Assessment Requirements
SSD	State Significant Development
Umwelt	Umwelt (Australia) Pty Ltd

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Appendix 8	Issuing of Draft Report
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1.0 Introduction

1.1 Introduction

Umwelt was engaged by Akalan Projects Pty Ltd (Akalán) to prepare an Aboriginal Cultural Heritage Assessment (ACHA) relating to the upgrading of existing facilities at St George Private Hospital, as well as the construction of a new Clinical Tower on Hogben Street, Kogarah, New South Wales (NSW) (the Project). Development approval for the Project will be sought as a State Significant Development (SSD) and will require development consent under *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP) and Part 4 of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act), meaning that the need for approvals under the *NSW National Parks and Wildlife Act 1974* (NPW Act) are not applicable (i.e., Section 90A).

The ACHA contained herein details the results of Umwelt's assessment for the Project, which followed the general guidance of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (Code of Practice) and Section 3.1 of the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage [former], 2011) (OEH, 2011). A program of Aboriginal community consultation was undertaken with reference to the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Department of Environment, Climate Change and Water [former], 2010) (Consultation Requirements).

1.2 The Project

The SSDA seeks consent for two (2) components:

- **New Clinical Tower** – The proposed new health services facility (hospital) will be located on land that is bound by three road frontages, being Princes Highway to the east, Hogben Street to the north, and Bank Lane to the west. This site comprises eight adjoining allotments of land, identified as 119–129 Princes Highway, Kogarah, and 2 Hogben Street, Kogarah (**Figure 1.2**).

The proposed clinical tower footprint currently accommodates a hard-stand parking lot, providing approximately 90 car parking spaces and a two-storey commercial premises (subject to separate demolition), which is attached to the existing multi-storey health services facility at 2 South Street, Kogarah.

- **Main Hospital Campus Redevelopment** – The existing hospital is located at 1 South Street, Kogarah which is also known as 1A South Street, Kogarah. St George Private Hospital is currently bound by two road frontages, being South Street to the north and Princes Highway (a classified road) to the east (**Figure 1.2**).

1.3 Project Area

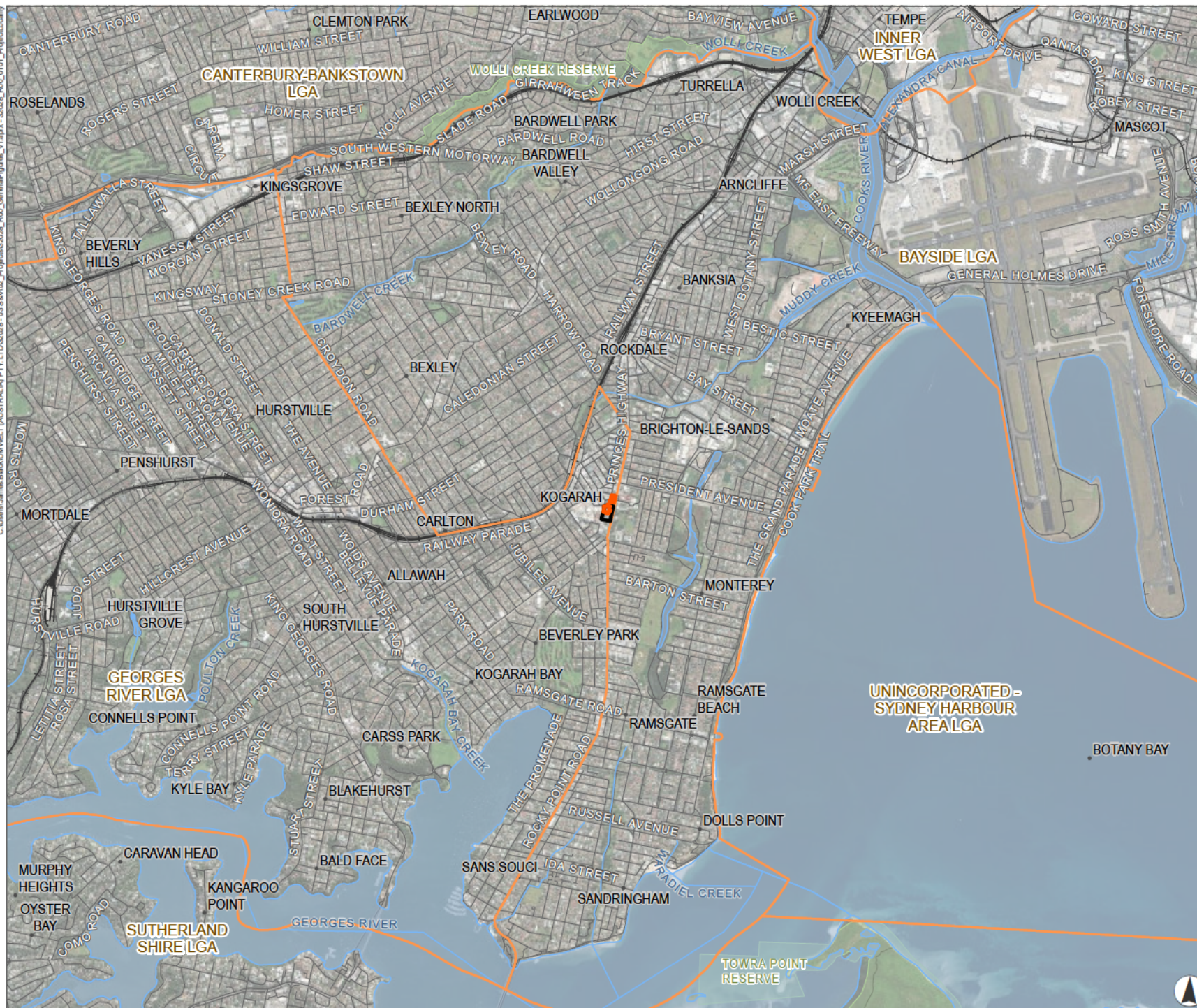
The St George Private Hospital main campus and the proposed clinical tower development area are hereafter collectively referred to as the 'Project Area'. The Project Area is situated within in the Georges River Local Government Area (LGA), and within the Kogarah town centre (**Figure 1.1**).

The clinical tower site is adjoined to the south by an existing multi-storey health services facility, which forms part of the existing St George Private Hospital campus. South Street separates this facility from the main hospital campus, though a connecting sky-bridge provides pedestrian access between the buildings. Further west is the St George Public Hospital, and other surrounding development comprises a mix of commercial premises (typically at ground floor) and medium and high-density residential premises.

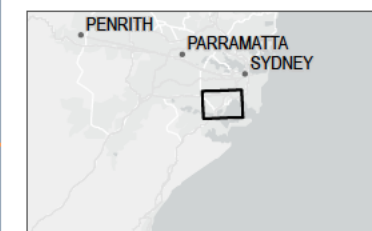
On the opposite (eastern) side of Princes Highway is a mix of educational premises including Moorfield Girls High School, James Cook Boys Technology High School, St George High School, and a TAFE NSW campus. Surrounding development on this side of Princes Highway primarily constitutes low density residential premises.

There is a pedestrian bridge that extends from Hogben Street over the Princes Highway, which provides direct access to the eastern side of the highway.

FIGURE 1.1
Project Locality



- Legend**
- Project Area
 - St George Private Hospital
 - Local Government Area
 - NPWS Reserve
 - Road
 - Railway
 - Watercourse
 - Waterbody



Scale 1:50,000 at A4
GDA2020 MGA Zone 55



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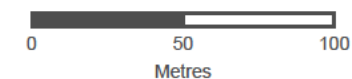
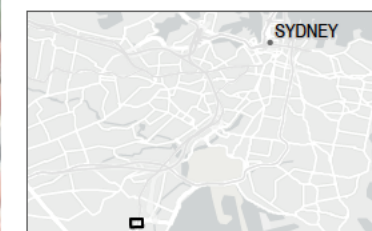
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FIGURE 1.2
Project Area

Legend

-  Project Area
-  St George Private Hospital
-  Local Government Area
-  Road



Scale 1:2,500 at A4
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1.4 Overview of the Proposed Development

In summary, works associated with the **clinical tower** site will comprise:

- Site preparation works and bulk earthworks, including tree clearing.
- Construction of a seven (7) storey health services facility (hospital) equating to a total GFA of 9,952 m².
- Construction of a five (5) level basement carpark including a radiation oncology unit, providing a total of 241 parking spaces.
- Ancillary office, amenities, and loading dock provisions.
- Basement storage and a substation.
- Landscaping works.

In addition, approval for the following is sought for the main hospital campus:

- Construction of an emergency department at the northern end of the existing hospital, to be operated 24 hours a day, seven days a week. Note this will be within the existing building envelope.
- Alterations to the South Street frontage, including surfacing and landscaping to facilitate ambulance bays and access requirements.
- Construction of a BOC Gas Cylinder enclosure.
- Associated internal re-configurations.

1.5 Secretary's Environmental Assessment Requirements

Development approval for the Project will be sought as an SSD (SSD-86969958), requiring development consent under Planning Systems SEPP and Part 4 of the EP&A Act. Industry-standard Secretary's Environmental Assessment Requirements (SEARs) were issued for the Project on 30 June 2025, requiring the compilation of an Environmental Impact Statement (EIS), supported by an ACHA inclusive of a consultation program with Aboriginal stakeholders in accordance with the Code of Practice and Consultation Requirements.

The SEARs relevant to this technical assessment are presented in **Table 1.1**.

Table 1.1 SEARs Relating to SSD-86969958

SEARs	Requirement	Section Addressed
SEARs Item #19 (Aboriginal Heritage)	an ACHA prepared in accordance with the Code of Practice for Archaeological Investigation in NSW (DECCW, 2010), and guided by the Guide to Investigating, Page 5 of 11 <i>Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales</i> (OEH, 2011)	This Document
	identify, describe and assess impacts on the Aboriginal cultural heritage values that exist across the development site	Section 9.0
	provide evidence and details of consultation with Aboriginal people in accordance with the Consultation Requirements	Section 3.0
	include results of a surface survey and any test excavations and an unexpected finds protocol	Section 7.0 Section 10.1.1

1.6 The Proponent

The proponent for this investigation is **Akalan**, a professional project and construction management consultant specialising in building refurbishment, health care facilities and commercial interior fit-outs along the east coast of Australia. Key proponent details are presented in **Table 1.2**.

Table 1.2 Proponent Details

Requirement	Details
Full Name/s	Akalan Projects Pty Ltd
Street Address	Suite 212/68 Alexander St, Crows Nest, NSW, 2065
ABN	15 095 839 071

1.7 Assessment Objectives

The overarching objectives of the Aboriginal cultural heritage assessment detailed in this report are as follows:

- To identify the Aboriginal cultural heritage values of the Project Area using a combination of background research, archaeological survey and Aboriginal community consultation.
- To present the outcomes of Aboriginal community consultation, undertaken during the preparation of this report, and presenting the views of Aboriginal people regarding the likely impact of the Project on their cultural heritage.

1.8 Assessment Approach

The current assessment was undertaken in accordance with the OEH 2011 guidelines, the Code of Practice, and Consultation Requirements, and included the following:

- Searches of the Aboriginal Heritage Information Management System (AHIMS) for all Aboriginal sites within the current Project Area and surrounds.
- Review of the environmental context of the Project Area and environs, with specific consideration to its implications for past Aboriginal land use.
- Review of relevant archaeological and ethnohistoric information for the Project Area and environs.
- To identify, notify and register Aboriginal people who hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places in the Project Area.
- To provide Registered Aboriginal Parties (RAPs) with information about the scope of the proposed works and Aboriginal heritage assessment process.
- To facilitate a process whereby RAPs can:
 - Contribute culturally appropriate information to the proposed assessment methodology
 - Provide information that will enable the cultural significance of Aboriginal objects and/or places within the Project Area to be determined
 - Have input into the development of cultural heritage management options.
- To prepare and finalise an ACHA report with input from RAPs.

1.9 Native Title

The National Native Title Tribunal (NNTT) register contains determinations of native title made by:

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

A search of the NNTT register was undertaken on 29 April 2025. No Native Title claims and no Indigenous Land-Use Agreements (ILUAs) have been registered or notified by the NNTT as being in place over the Project Area.

1.10 Project Team

Brent Koppel (Archaeologist, Umwelt) was the primary author of the current assessment report. Luke Wolfe (Principal Archaeologist, Umwelt) provided technical review of this report.

The fieldwork component of the current assessment was undertaken by Brent Koppel and Carmel Dowling (Social Consultant, Umwelt), in collaboration with RAP stakeholder representatives (refer **Section 7.0**).

Aboriginal community consultation for this assessment was undertaken in accordance with the Consultation Requirements (DECCW, 2010). Full details of the consultation process undertaken are provided in **Section 3.3.1**. Aboriginal organisations and/or individuals consulted as part of this assessment are listed in **Table 1.3**.

Table 1.3 Registered Aboriginal Parties

Organisation / Individual	Primary Contact Person
Metropolitan Local Aboriginal Land Council (LALC)	-
Long Gully Cultural Services	Ethan Trewlynn
Yulay Cultural Services	Arika Jalomaki
Wailwan Aboriginal Group	Phillip Boney
Didge Ngunawal Clan	Lilly Carroll
Gandangara Local Aboriginal Land Council	Daliah Aggrey-Fynn
Yarrawalk Pty Ltd	Scott Franks
Thomas Dahlstrom	Thomas Dahlstrom
A1 Indigenous Services	Carolyn Hickey
Amanda Hickey Cultural Services	Amanda De Zwart
Butucarbin Aboriginal Corporation	Jennifer Beale
Konanggo Aboriginal Cultural Heritage Services	Robert Young
Pamela Young	Aunty Pamela Young
Yurwang Gundana Cultural Heritage Services	Dean Bell

1.11 Report Structure

This report contains 11 sections. This section (**Section 1.0**) has provided background information on the assessment undertaken and provides a description of the Project Area. The remainder of the report is structured as follows:

- **Section 2.0** summarises relevant statutory controls relevant to the Project Area.
- **Section 3.0** documents the Aboriginal community consultation process undertaken for this assessment.
- **Section 4.0** summarises relevant environmental and landscape information for the Project Area and environs.
- **Section 5.0** summarises relevant ethnohistoric information for the Project Area.
- **Section 6.0** summarises relevant archaeological information for the Project Area and environs.
- **Section 7.0** describes the results of the fieldwork program.
- **Section 8.0** provides a significance for all Aboriginal sites within the Project Area.
- **Section 9.0** discusses the proposed activity and its associated impacts.
- **Section 10.0** outlines for the management recommendations for the Project Area.
- **Section 11.0** lists the references cited in-text.

Details of where to locate the report content stipulated in the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* are provided in **Table 1.4**.

Table 1.4 Heritage NSW Requirements Reference Table

Requirement	Refer to
How the requirements for consultation with Aboriginal people have been met (as specified in clause 80C of the National Parks and Wildlife Regulation 2019 (NPW Regulation)).	Section 3.0
A description of the Aboriginal objects and declared Aboriginal places located within the area of the Project.	Section 6.0 Section 7.0
A description of the cultural heritage values, including the significance of the Aboriginal objects and declared Aboriginal places, that exist across the whole area that will be affected by the proposed activity and the significance of these values for the Aboriginal people who have a cultural association with the land.	Section 8.1
The views of those Aboriginal people regarding the likely impact of the Project on their cultural heritage (if any submissions have been received as a part of the consultation requirements, the report must include a copy of each submission and your response).	Section 3.2.3
Actual or likely harm posed to the Aboriginal objects or declared Aboriginal places from the proposed activity, with reference to the cultural heritage values identified.	Section 9.0
Any practical measures that may be taken to protect and conserve those Aboriginal objects or declared Aboriginal places.	Section 10.0
Any practical measures that may be taken to avoid or mitigate any actual or likely harm, alternatives to harm or, if this is not possible, to manage (minimise) harm.	

1.12 Acknowledgements

Umwelt and Akalan would like to thank and acknowledge the assistance of all Aboriginal peoples who participated in the engagement process and fieldwork components of the assessment and contributed their cultural knowledge to aid in the protection and management of their cultural heritage within the Study Area.

In the production of this ACHAR, Umwelt undertook a program of consultation with Aboriginal peoples to ensure their recognition, that their voices were heard, and that their interests, concerns and knowledge were documented, as appropriate. **Both Umwelt and Akalan respectfully acknowledge that any cultural information contained herein remains the property of Aboriginal peoples and is only reproduced in this report with permission.** Where relevant, sensitive cultural information has been omitted from this report by request. Umwelt acknowledge the right of Aboriginal peoples in Australia to give or withhold free, prior, and informed consent (FPIC) for the use of their traditional lands, resources, knowledge, or intellectual property (Lehr, 2014: 4).

The currently accepted model utilised in Australia for the protection of cultural heritage, traditional knowledge and traditional cultural practises, which was adopted for this assessment more broadly, uses the nomenclature ‘Indigenous Cultural and Intellectual Property’ (ICIP), following the *Our Culture: Our Future Report* (Janke *et al*, 1999). The term has a recognised meaning both in Australia and internationally, and has been adopted by Umwelt as an acknowledgement of Aboriginal cultural heritage, traditional knowledge and practises.

Umwelt acknowledges that this report utilises some technical terminology to describe and interpret Aboriginal cultural connections to their respective Country that is often founded within an archaeological framework. All attempts have been made to avoid unnecessary generalisations about the past occupation of the Study Area and environs. Documented resources relating to pre-colonisation Aboriginal peoples are generally scarce, and consequently local newspapers and European accounts provide much of the early documented lives of Aboriginal peoples. As these resources are often written from a Euro-centric perspective, which Umwelt acknowledges rarely reflect the views of Aboriginal peoples today. Where such resources have been referenced, every attempt has been made to provide an objective interpretation of the available literature.

Umwelt also notes that the term ‘Aboriginal’, when used in this report, denotes Aboriginal peoples of Australia and their respective cultures, following the terminology prescribed in Section 4 (1) of the *Aboriginal Land Rights Act* 1983 and Section 5 (1) of the NPW Act. However, in using the term, an attempt has also been made to refrain from being overly generic and as such, the names/terms: ‘Darug and Dharawal’ and ‘Darug- and Dharawal-speaking Peoples’ have also been used, where relevant and/or possible. These names attempt to reflect and acknowledge the diversity of cultures and beliefs of Aboriginal peoples, broadly and within Darug and Eora Country and surrounds.

2.0 Statutory Controls

2.1 State

2.1.1 Environmental Planning and Assessment Act 1979

The NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) requires that consideration be given to environmental impacts as part of the land use planning process in NSW. In NSW, environmental impacts are interpreted as including impacts to Aboriginal and non-Aboriginal (i.e., historic) cultural heritage.

Akalan is seeking development consent under Part 4 of the EP&A Act. Pursuant to Division 5.2, Subdivision 4, section 5.23(1)(d) of the EP&A Act, approval under Part 4 of the NPW Act, or an Aboriginal Heritage Impact Permit (AHIP) is not required for SSD projects. Impacts to Aboriginal heritage values associated with approved SSD projects are typically managed under Aboriginal Cultural Heritage Management Plans (ACHMPs). ACHMPs are statutorily binding once approved by the NSW Department of Planning, Housing and Infrastructure (DPHI). The requirement to undertake Aboriginal heritage assessments is determined in the preparation of the SEARs as specified under Division 5.2, Subdivision 2, Section 5.16 of the EP&A Act.

2.1.2 National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NSW) (NPW Act) is the primary legislation for the protection of Aboriginal cultural heritage in NSW. Heritage NSW is primarily responsible for regulating the management of Aboriginal cultural heritage in New South Wales under the NPW Act. The NPW Act is accompanied by the NPW Regulation and supported by the Code of Practice (DECCW, 2010b), and other codes of practice relating to demonstration of due diligence.

The NPW Act gives the Heritage NSW the responsibility for the proper care, preservation and protection of 'Aboriginal objects' and 'Aboriginal places', defined under the Act as:

- An **Aboriginal object** is any deposit, object or material evidence (that is not a handicraft made for sale) relating to the Aboriginal habitation of NSW, before or during the occupation of that area by persons of non-Aboriginal extraction (and includes Aboriginal remains).
- An **Aboriginal place** is a place declared so by the Minister administering the NPW Act because the place is or was of special significance to Aboriginal culture. It may or may not contain Aboriginal objects.

Under Section 84 of the NPW Act, an Aboriginal Place must be declared by the Minister as a place that, in the opinion of the Minister, is or was of special significance with respect to Aboriginal culture. Part 6 of the NPW Act provides specific protection for Aboriginal objects and places by making it an offence to harm them and includes a 'strict liability offence' for such harm. A 'strict liability offence' does not require someone to know that it is an Aboriginal object or place they are causing harm to in order to be prosecuted. Defences against the 'strict liability offence' in the NPW Act include the carrying out of certain 'Low Impact Activities', prescribed in Clause 80B of the NPW Regulation, and the demonstration of due diligence.

In accordance with Section 86(1) of the NPW Act, it is an offence to harm or desecrate a known Aboriginal object, whilst it is also an offence to harm an Aboriginal object under Section 86(2). Similarly, Section 86(4) states that a person must not harm or desecrate an Aboriginal place.

Harm to an Aboriginal object or place is defined as any act or omission that:

- a. destroys, defaces or damages an object or place, or*
- b. in relation to an object – moves the object from the land on which it had been situated, or*
- c. is specified by the regulations, or*
- d. causes or permits the object or place to be harmed in a manner referred to in paragraph a., b. or c.,*

but does not include any act or omission that:

- a. desecrates the object or place, (noting that desecration constitutes a separate offence to harm), or*
- b. is trivial or negligible, or*
- c. is excluded from this definition by the regulations.*

Section 87(1) of the NPW Act specifies that it is a defence to prosecution under Section 86(1) and Section 86(2) if the harm or desecration of an Aboriginal object was authorised by an AHIP and the activities were carried out in accordance with that AHIP.

Pursuant to Section 4.41 of the EP&A Act however, AHIPs are not required for SSD approved under Division 4.7 of Part 4 of the EP&A Act. Impacts to Aboriginal heritage values associated with approved SSD projects are typically managed under ACHMPs (refer to **Section 2.1.1**).

Section 89A of the NPW Act requires notification of the location of Aboriginal sites within a reasonable time, with penalties for non-notification. Section 89A is binding in all instances.

2.2 Local

2.2.1 Local Environmental Plans

The Georges River Local Environment Plan (LEP) (2021) was established under the provisions of the EP&A Act. This LEP provides guidance for development activities within Georges River LGA. Part 5.1 of the LEP establishes the requirements for development consent in relation to heritage conservation.

The objectives of Part 5.1 include conservation of Aboriginal objects or Aboriginal places of heritage significance. In accordance with these provisions, development consent is required for any activity that will involve:

- Demolishing or moving an Aboriginal object.
- Disturbing or excavating an Aboriginal place of heritage significance.
- Erecting a building on land on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.
- Subdividing land containing an Aboriginal object or Aboriginal place of heritage significance.

A search of Schedule 5 of the Georges River LEP (2021) was undertaken for previously listed Aboriginal heritage items. No listings for any Aboriginal place of heritage significance, object or site are currently listed under the Georges River LEP (2021) locate within the Project Area.

3.0 Aboriginal Party Consultation

Aboriginal community consultation acknowledges the right of Aboriginal peoples to be involved, through direct participation, on matters that directly affect their cultural heritage. Involving Aboriginal people in all facets of the assessment process ensures that they are given adequate opportunity to share information about cultural values, and to actively participate in the development of appropriate management and/or mitigations measures.

Aboriginal community consultation for this assessment was undertaken in with reference to the Consultation Requirements. The results of the consultation process undertaken are detailed below. A consultation log is provided as **Appendix 2**.

3.1 Stage 1 – Notification and Registration

The aim of Stage 1 of the Consultation Requirements is to identify, notify and register Aboriginal stakeholders who hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places in the Project Area.

3.1.1 Consultation with Regulatory Agencies

Section 4.1.2 of the Consultation Requirements stipulates that proponents are responsible for determining the names of Aboriginal stakeholders who may hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places. Proponents are required to compile a list of Aboriginal stakeholders who may have an interest in being consulted for a project by writing to:

- Heritage NSW
- the relevant Local Aboriginal Land Council(s) (LALC)
- the Registrar, NSW *Aboriginal Land Rights Act 1983* for a list of Aboriginal owners
- the National Native Title Tribunal for a list of registered native title claimants, native title holders
- Native Title Services Corporation Limited (NTSCORP Limited)
- the relevant local council(s)
- the relevant catchment management authority (i.e. Local Land Services) for contact details of any established Aboriginal reference group.

In accordance with this requirement, the following agencies were contacted via email on 15 May 2025, requesting information on relevant Aboriginal persons and organisations:

- Heritage NSW
- Metropolitan LALC
- The Office of Registrar Aboriginal Land Rights Act NSW
- the National Native Title Tribunal (NNTT)
- Native Title Services Corporation Limited (NTSCORP Limited)

- Georges River Council
- Greater Sydney Local Land Services (LLS).

Four (4) total responses were received by Umwelt. Heritage NSW returned a list of 67 Aboriginal persons and/or organisations with a registered interest in the Georges River LGA. The NNTT confirmed that all curtilages that comprise the Project Area are freehold tenure. Greater Sydney LLS stated that they are not a primary source of contact for Aboriginal communities or persons that may inform or provide comment on development or planning issues, and that contact should be made with Heritage NSW and the appropriate LALC. The Office of the Registrar, *Aboriginal Land Rights Act* (1983) confirmed that there are currently no Registered Aboriginal Owners in the Project Area.

3.1.2 Public Notification

Section 4.1.3 of the Consultation Requirements requires that, in addition to writing to the Aboriginal individuals and/or organisations identified by the agencies listed in **Section 3.1.1**, the proponent must also place a notice in the local newspaper circulating in the general location of the proposed project. A public notice was placed in the St George and Sutherland Shire Leader on 16 July 2025. No responses were returned. A copy of the advertisement is included in the consultation documentation provided in **Appendix 3**.

3.2 Stage 2 – Project Information and Invitations for Expressions of Interest

Section 4.1.3 of the Consultation Requirements requires that proponents must write to the Aboriginal people whose names were obtained through the regulatory agencies and the relevant LALC(s) to notify them of the proposed project and invite them to register an interest in participating in a process of community consultation.

A letter inviting expressions of interest and containing project summary information was sent to all Aboriginal individuals and/or organisations on 8 July 2025 (**Appendix 3**). A total of 69 Aboriginal individuals and/or organisations were contacted to register an interest in being consulted. The Aboriginal individuals and/or organisations were provided a 14-day period (to 22 July 2025) to respond. By the closing date for expressions of interest, 14 responses were received indicating their interest in registering as RAPs for the Project.

Summary information on RAPs, including registration dates, is provided in **Table 3.1** and copies of registration provided in **Appendix 4**.

Table 3.1 Registered Aboriginal Parties

Organisation	Contact Person	Date of Registration
Metropolitan LALC	-	8/7/2025
Long Gully Cultural Services	Ethan Trewlynn	8/7/2025
Yulay Cultural Services	Arika Jalomaki	8/7/2025
Wailwan Aboriginal Group	Phillip Boney	8/7/2025
Didge Ngunawal Clan	Lilly Carroll	8/7/2025
Gandangara Local Aboriginal Land Council	Daliah Aggrey-Fynn	8/7/2025
Yarrawalk Pty Ltd	Scott Franks	8/7/2025
-	Thomas Dahlstrom	8/7/2025
A1 Indigenous Services	Carolyn Hickey	9/7/25
Amanda Hickey Cultural Services	Amanda De Zwart	20/7/25
Butucarbin Aboriginal Corporation	Jennifer Beale	21/7/25
Konanggo Aboriginal Cultural Heritage Services	Robert Young	21/7/25
-	Aunty Pamela Young	21/7/25
Yurwang Gundana Cultural Heritage Services	Dean Bell	22/7/25

3.2.1 Notification of Registered Aboriginal Parties

Section 4.1.6 of the Consultation Requirements requires that the proponent make a record of the names of each Aboriginal person who registered an interest and provide evidence of that record to Heritage NSW and the relevant LALC(s). Section 4.1.5 of the Consultation Requirements provides the opportunity for Aboriginal persons to withhold their details from being forwarded to these parties.

Notification of RAPs to Heritage NSW and Metropolitan LALC was sent on 11 September 2025 and provided in **Appendix 6**.

3.2.2 Stage 2 – Presentation of Information about the Project

The aim of Stage 2 of the Consultation Requirements is to provide RAPs with information about the scope of the Project and the proposed cultural heritage assessment process. For the current assessment, presentation of information about the Project Area and proposed development was provided to RAPs as part of the draft methodology detailed in **Section 3.3**.

3.2.3 Stage 3 – Gathering Information about Cultural Significance

The aim of Stage 3 of the Consultation Requirements is to facilitate a process allowing RAPs to contribute to culturally appropriate information gathering and the assessment methodology, provide information that will enable the cultural significance of Aboriginal objects and/or places to be determined and have input into the development of any cultural heritage management measures.

For the current assessment, consultation with RAPs regarding the cultural heritage values of the Project Area included:

- A request with the draft assessment methodology for any initial comments regarding the Aboriginal cultural heritage values of the Project Area.
- Discussion of cultural heritage values during fieldwork activities.
- The provision of a draft report to all RAPs for comment prior to finalisation.

3.3 Draft Survey Methodology

Sections 4.3.1 and 4.3.2 of the Consultation Requirements require that the proponent present the proposed methodology for the cultural heritage assessment to all RAPs with the invitation for RAPs to review and provide feedback on this methodology. In accordance with these requirements, on 6 August 2025, all RAPs were sent a draft of Umwelt's proposed methodology, provided in **Appendix 6**. RAPs were given 28 days (to 3 September 2025) to respond to the proposed assessment method but were informed that cultural information could be provided throughout the duration of the assessment.

Two (2) responses were received by Umwelt (**Appendix 7**). Ms Carolyn Hickey (A1 Indigenous Services) agreed with the proposed survey methodology as provided by Umwelt. Mr Ethan Trewlynn (Long Gully Cultural Services) agreed with the proposed survey methodology. Further comments were provided describing the cultural importance of sites across the Sydney region despite the extent of urban and industrial development. Additionally, Mr Trewlynn commented that protocols for the management of Aboriginal objects and/or sites relevant to the Project should be developed and implemented in collaboration with Aboriginal stakeholders.

3.3.1 Archaeological Survey Program

A selection of RAPs were provided with the opportunity to be involved in the pedestrian survey of the Project Area. Notifications for the proposed field assessment were sent by Umwelt via email to RAPs on 19 August 2025. Umwelt emailed and/or phoned RAPs periodically throughout the consultation period in order to determine field representative availability and confirmation of attendance. Five (5) RAPs indicated their participation in the survey program, and of these, three (3) RAPs could not attend. RAP field representatives who participated in the survey program are listed by organisation in **Table 3.2**.

Table 3.2 RAP Representative Participation in Surveys of Project Area 10 September 2025

RAP Organisation	RAP Representative
Long Gully Cultural Services	Ethan Trewlynn
Konanggo Aboriginal Cultural Heritage Services	Robert Young

3.3.2 Consultation During and After Fieldwork

Umwelt discussed various assessment and management options with RAPs during the survey to gauge the suitability of certain measures. In addition, cultural information pertaining to the Project Area was discussed at the conclusion of the surveys. Mr Robert Young (Konanggo Aboriginal Cultural Heritage Services) emphasised value of a healthy ecosystem to the spiritual wellbeing of the people who live within it. Natural vegetation patterns, with particular emphasis on the presence of mature trees, is critical to this. Further, the removal of soils and material from its environment can compromise this spiritual wellbeing. As such, where possible, Mr Young that native plants relevant to the environs of the Project Area be incorporated in the landscaping of the Project. Similarly, the soil and sediment material excavated as part of the construction of the clinical tower should not be taken offsite, and reincorporated into the immediate vicinity where practicable.

Both Mr Young and Mr Trewlynn also recommended that aspects of Aboriginal knowledge and culture be incorporated as design elements as part of the Project, such as art sourced from local artists depicting local traditional knowledge.

3.4 Stage 4 – Draft Report

The aim of Stage 4 of the Consultation Requirements is to prepare and finalise an ACHAR while providing an opportunity for RAPs to provide input and/or feedback. In accordance with Section 4.4.2 of the Consultation Requirements, on 3 October 2025, all RAPs were sent a draft copy of the ACHA report for review and comment (**Appendix 8**). The closing date for comments was 31 October 2025, which provided the minimum 28-day review period.

Responses to the draft ACHA report were received from two (2) RAPs, summarised in **Table 3.3** with copies of written responses attached as **Appendix 9**. Both Konanggo Aboriginal Cultural Heritage Services and A1 Indigenous Services approved of the methodology undertaken as part of the ACHA, and fully supported the information provided in the draft ACHA, and its findings and recommendations. Konanggo Aboriginal Cultural Heritage Services recommended that the proponent might gain further insights through engagement with the Connecting to Country Framework (Government Architects NSW, 2023). Konanggo Aboriginal Cultural Heritage Services further suggested that anthropologist Paul Irish has undertaken considerable work within the region with regards to Aboriginal heritage, and could provide further insights into engaging with the Connecting to Country Framework (Government Architects NSW, 2023).

Table 3.3 RAP Responses to Draft Report

Registered Aboriginal Party	Date of Response	Method of Response	Summary of Response	Umwelt Response to Comment
A1 Indigenous Services	4/10/2025	Email	Fully supportive of the methodology, information, findings and recommendations.	No further comment.
Konanggo Aboriginal Cultural Heritage Services	7/10/2025	Email	- Fully supportive of the methodology, information, findings and recommendations. - Recommended engagement with the Connecting to Country Framework (Government Architects NSW, 2023). - Suggested that Paul Irish might offer further insights.	Umwelt acknowledges that Akalan has undertaken further investigations with Balarinji Indigenous Design and Strategy as a means of engaging with the Connecting with Country Framework (Government Architects NSW, 2023) as a component of the Project.

4.0 Environmental Context

The Project Area falls within the Sydney Basin Bioregion, at the junction of the Sydney Cataract and Pittwater sub-regions following the Interim Biogeographic Regionalisation for Australia (IBRA) classification.

4.1 Physical Setting

The Project Area and surrounding environs is an entirely built environment so only broad topographical patterns can be interpreted as natural. The topography of the Project Area and its environs is gently undulating though predominantly flat, with a gradual rise in elevation trending northwest with an approximate elevation of 29 m above sea level. The Project Area is situated approximately 1.6 km west of Botany Bay. The environs surrounding the Project Area are characterised by landscapes classified by Mitchell (2002), with the Woronora Plateau landscape characterising the Project Area. The Ashfield Plains and Sydney-Newcastle Barrier Beaches landscapes as defined by Mitchell (2002) being documented to the west and east respectively.

4.2 Hydrology

No mapped watercourses have been identified within the Project Area. The nearest permanent water source is Scarborough Ponds, located approximately 700 m to the east of the Project Area within Scarborough Park and the Scarborough Ponds Catchment. This water feature drains the nearby urban environment with vegetation surrounding Scarborough Ponds (EcoLogical, 2022: 25). Muddy Creek, located approximately 1.1 km northeast of the Project Area, flows in an easterly direction to where it discharges into the Cooks River, approximately 3.7 km northeast of the Project Area.

Prior to the establishment of a permanent European presence, the waterways within the environs of the Project Area would have been an integral component of Aboriginal lifeways. Freshwater ecologies would have supported plants and animals targeted as food resources (see **Section 5.1.4**) as well as providing a source of drinking water.

The Project Area and its surrounds comprises a nearly entirely developed landscape featuring commercial and medium- and high-density residential infrastructure. As such, hydrological regimes have been modified from their natural state. The route of extant waterways such as Georges and Cooks Rivers remain largely unmodified, however lower order streams and channels have been replaced by artificial drainage and sewerage networks and canals.

4.3 Geology and Soils

Locally, mapped geologies (Raymond *et al.*, 2012) of the Project Area and surrounding environs have been identified as medium- to coarse-grained quartz sandstone with minor shale and laminate lenses typical of the Hawkesbury Sandstone. Surrounding this are rock units of the Wianamatta Group characterised by sedimentary units including sandstone, siltstone, and shale.

Soils of the Pittwater subregion are characterised by deep yellow earths at higher elevations, contrast texture soils on slopes, and loamy sands in alluvium along waterways (NPWS, 2003: 193). Quartz sands with varying degrees of shell content characterise coastlines (NPWS, 2003).

Mapped soil landscapes identify the Project Area being situated on the aeolian Lucas Heights soil landscape (*lh*), characterised by gently undulating crests and ridges on plateau surfaces of the Mittagong formation comprising alternating beds of shale and fine-grained sandstone (Chapman *et al.*, 2009). The Newport soil landscape (*np*) has been mapped to the east of the Project Area, and comprises well sorted siliceous sands overlying moderately deep buried sands sandstone (Chapman *et al.*, 2009).

4.4 Flora and Fauna

The immediate surrounds of the Project Area have been subject to decades of landscape modification, vegetation clearance, urbanisation, and industrialisation. The current landscape is entirely developed, with historical imagery (see **Section 4.5**) from 1943 revealing no natural vegetation near the Project Area. Kamay Botany Bay National Park, located to the southeast on the southern shoreline of Botany Bay likely represents the most accurate representation of pre-European landscapes of the region. At Kamay Botany Bay National Park, vegetation patterns are characterised by heathlands, with species representation depending on local geology and substrate type. Sandstone heathlands feature Bracelet Honey-myrtle (*Melaleuca armillaris*), Scrub She-oak (*Allocasuarina paludosa*), Heath-leaved Banksia (*Banksia ericifolia*) and Coastal Rosemary (*Westringia fruticosa*) are common (DECCW, 2011: 27). Sand heathlands feature Heath-leaved Banksia (*Banksia ericifolia*), Coast Tea-tree (*Leptospermum laevigatum*), Wallum Banksia (*Banksia aemula*) and Scrub She-oak (*Allocasuarina distyla*), while on the deeper dunes stunted Old Man Banksia (*Banksia serrata*) and Scrub She-oak (*Allocasuarina paludosa*) dominate (DECCW, 2011: 26). Sedges, clumps of forbs, grevilleas, and geebung are common understorey species in both ecologies.

As with vegetation, determining the pre-European occupation faunal landscape of the Project Area and environs is difficult to determine with any certainty due to past land use practices. Clearing of vegetation for grazing as well as the introduction of invasive species and pests such as rabbits and foxes, would have vastly changed faunal patterning through predation and competition as resources changed towards a more urbanised landscape. However, consideration of pre-European vegetation regimes suggests that a range of terrestrial faunal resources would have been present in the area. A diverse array of terrestrial mammals would have been present. A range of species of birds, reptiles, and amphibians would have also been available in open woodland and heathland areas.

Of note would be the marine ecologies of Botany Bay and surrounding coastal areas that would have supported a plethora of fauna. Fish such as Bream (*Acanthopagrus* spp.) and Flathead (*Platycephalidae*) remain readily available from the shoreline. Gastropod species such as *Cabestana spenglerii*, *Nerita* spp., as well as rock oysters (*Saccostrea* spp. and *Ostrea* spp.), are common on rocky and hard substrates. Each of these marine species would likely have been targeted by local Aboriginal groups as part of their subsistence regimes. Additionally, the remains of a Dugong (*Dugong dugon*) featuring marks associated with butchery using stone implements have been recorded approximately 4 km to the west of the Project Area (Etheridge *et al.*, 1896) and dated to 5,520±70 years BP (Haworth *et al.*, 2004) demonstrating the breadth of subsistence practices of local Aboriginal groups.

4.5 Land-use History

4.5.1 Early European Colonialism

Initial occupation of the Botany Bay area by European colonists occurred rapidly following the landing of the First Fleet in 1788. A British settlement was established at Botany Bay in 1788, and acted a colony principally comprised of European convicts (Liston, 2017: 195). The beginnings of European occupation of the Botany area were largely informal, with formal land grants not being awarded until the following century. Land was cleared of vegetation being cleared as public and private farms were established to feed the growing European population (Liston, 2017: 197).

The land-use history of the Project Area and surrounding environs is closely aligned with the industrialisation of the broader region post-European colonisation in the late 18th century. The potential of the broader Botany Bay coastline was immediately identified by then Lieutenant Cook in 1770, whose observations regarding the presence of freshwater earmarked the area as a potential permanent settlement (Conroy, 2017: 7). The area that would become Kogarah specifically, was not viewed as favourably as the tracts of land along the northern coastline due to dense forests and swampy lands preventing easy agriculture (Malliate, 1973: 2). European expansion was made permanent at Botany Bay in 1809 with the first land grants being awarded by Governor Macquarie (Conroy, 2017: 76). Land grants to the neighbouring Municipality of Kogarah followed shortly after, with Captain John Townson and his brother Dr. Robert Townson being awarded 2,250 and 1,605 acres respectively in 1810 (Malliate, 1973: 1). James Chandler was awarded 1,200 acres in 1831 and included an area on which the modern-day Kogarah train station would be built approximately 400 m to the northwest of the Project Area. Dr. Townson established an orchard and built a house, only to sell the property to Simeon Lord, a prominent landowner in the Botany region to the northeast of Kogarah, in 1812 (Malliate, 1973: 1).

4.5.2 19th Century Development and Industrialisation

Rocky Point Road, which would come to be renamed to the Princes Highway adjacent to the Project Area, was first cleared by order of Governor Gipps (St George Historical Society, 1966: 1). This key piece of infrastructure facilitated urban expansion of the Project Area and environs, which continued through the mid- and late 19th century.

Persons who became prominent local landowners established themselves in the area during this time. John B. Carroll purchased 170 acres adjacent to Dr. Robert Townson's land in 1848. Others including William Blake Patrick English, James Derwent, William Maher, West, Justice, J.A. South, Biden, Murphy purchased land and settled between 1853 and 1856, cleared vegetation, and established gardens and orchards (St George Historical Society, 1966: 1). The soils of the broader landscape surrounding Botany Bay proved relatively productive, and attracted market gardeners who purchased lots, and other lots were rented out to market gardeners (Conroy, 2017: 272). Chinese immigrants attracted by the gold rush of the 1850s established communities of market gardens (Morris, 2001). These market gardens flourished through the early 19th century, driven by the gold rush of the 1850s (Larcombe, 1970), providing fruit, vegetables and oysters for Sydney (Healy, 1990: 142).

The early industrialisation of the region began with the damming of the waterways that fed Botany Swamps, and drained into Botany Bay, by Simeon Lord when he purchased his first parcel of land in 1816. This included Cooks River approximately 2 km to the northeast of the Project Area. Lord's decision to not subdivide his 600 acres was driven by a strategy towards Lord maintaining a substantial foothold in the development in the region. The Noxious Industries Act of 1848 relocated industrial activities that produced excessive waste and odours outside of Sydney city. Soon, areas such as Tempe, St Peters, Mascot and Botany were targeted for these noxious industries, principally due to the abundance of freshwater to facilitate their practices. Lord's damming of Cooks River had placed him and his lands as a prime location for these industries to establish themselves, and for Lord to directly profit (Conroy, 2017: 272). Wool washing, candle works, leather tanning, paper making, soap manufacture, boiling down works, glue making, among others, became commonplace (Lawrence, 2001).

The extent of industrialisation in the late 19th century resulted in a shift in the identity of the Botany area. Initially, the region was touted as an idyllic retreat from Sydney city with natural landscapes and fresh air. However, from the 1870s, the aforementioned noxious industries had widespread impacts due to pollution from blood, animal products, and chemicals entering waterways. Cooks River and nearby Sheas Creek were dredged, and ultimately the artificial waterway that would be named Alexandra Canal was constructed in 1894 in an attempt to manage the ongoing contamination, as well as support growing industrialisation in the area (Ringer, 2013).

Kogarah was declared a municipality in 1885 (Healy, 1990: 142).

In 1894, The St George Cottage Hospital was established when land was purchased and buildings constructed amounting to a total cost of £1,860. Within its first year of operation, the St George Cottage Hospital treated 80 patients (Malliate, 1973: 2) (**Figure 4.1**). By the end of the 19th century, the basic framework of Kogarah as a neighbourhood had been established.

4.5.3 The 20th Century

A new industry was introduced into the region in 1921, when land to the west of the Project Area was acquired by the Australian government to construct an airport. Gravel runways were installed in 1933, and by 1949, three (3) runways were active at what was named Sydney Kingsford Smith Airport (Sydney Morning Herald, 1938). Sydney Airport continued to be developed and expanded through the Second World War for civilian and military purposes, and after the war, Cook's River was diverted to its present location to facilitate the construction of additional runways and expanded operational infrastructure (Sydney Airport, 2013: 13).

In 1968, land reclamation activities extended Sydney Airport into Botany Bay to create a new runway large enough to accommodate long-haul jet aircraft, and again extended further into Botany Bay in 1978 to its current length of 3,962 m (Sydney Airport, 2013: 13).

More locally, the St George Hospital was declared a district hospital in 1924, as its facilities expanded as new additions, both in terms of buildings and capability, grew (Ritchie, 1998). The late 19th and early 20th centuries did see the construction of the Moorefield Racecourse located adjacent to the Project Area to the southeast between Princes Highway and President Avenue. Peter Moore established the Moorefield Racecourse in 1888, and it remained operational until 1951 following its purchase from Moore by the Sydney Turf Club in 1946 (Field, 2014). Its closure and decommissioning facilitated the property's subdivision, and the purchasing of a 7.7-acre lot to the Department of Education in the 1950s (Larence, 1996). Today, that property is now shared between the Moorefield Girls High School and TAFE NSW St George Campus.



Figure 4.1 St George Cottage Hospital 1897

Source: Kogarah Historical Society.

The local infrastructural landscape surrounding the Project Area remained largely unchanged through the mid- to late 20th century. Historical aerial imagery demonstrates the extent of urbanisation reaching its modern-day extent by the 1950s (**Figure 4.2** and **Figure 4.3**). With regards to the Project Area, in 1993, New South Wales Health Department approved the construction of the new St George Private Hospital through an amalgamation of Bexley Private Hospital, Pacific Private Hospital, and Kogarah Private Hospital (Salmons, 1993) (**Figure 4.4**). A major development within the St George Private Hospital property was undertaken in 2016 which saw the addition of new operating theatres, patient rooms, and a dedicated oncology unit.



Figure 4.2 Historical Aerial Image of the Project Area (1943)

Image source: Historical Imagery Viewer, NSW Government Spatial Services



Figure 4.3 Historical Aerial Image of the Project Area (1961). Note eastern remnant of Moorefield Racecourse

Image source: Historical Imagery Viewer, NSW Government Spatial Services



Figure 4.4 Historical Aerial Image of the Project Area (1994)

Image source: Historical Imagery Viewer, NSW Government Spatial Services

4.6 Key Observations

Key observations to be drawn from a review of both the environmental and Aboriginal archaeological context of the Project Area and environs are as follows:

- The Project Area and surrounding environs would have provided abundant resources for local Aboriginal groups prior to European colonisation, including terrestrial and marine subsistence, and freshwater sources (Hamilton et al., 2024: 278).
- The Project Area and its environs would likely have been a confluence of different Aboriginal communities necessitating inter-group trade and interactions (e.g. Attenbrow, 2002a; Attenbrow 2010: 126–42).
- Extensive vegetation clearance and landscape modification has been undertaken within the Project Area and environs as a result of industrial development post-European colonisation.

5.0 Cultural Context

5.1 Ethnohistoric Background

5.1.1 Language Groups

Language groups of the Sydney area have been generally classified as Eora, the Dharawal and the Darug (Dharug) peoples, comprised of at least 28 known clans with traditional boundaries. The Botany Bay area is considered to have been occupied by the Gweagal on the southern shores, the Bidjigal (also spelt Bediagal, Bejigal, Bedegal or Biddegall) to the northwest, and the Gameygal (also spelt Kameygal) on the northern shores (Lawrence, 1996; Attenbrow, 2010). The use of the word “Eora” has been used as an ethnonym by European colonists since 1899, however there is no evidence of the word being used by Aboriginal people since 1788 to indicate its use as a reference to language or group of people. The word first appears in the wordlists of officers of the First Fleet in 1788, where it was mostly translated as “men” or “people” (Attenbrow, 2010). ‘Eora’ has mostly been used since the 20th century to refer to Aboriginal people occupying the Sydney peninsula and both north and south of Port Jackson area (Attenbrow, 2002b: 34).

Several past writers and other sources have identified the Kameygal, also spelt Gameygal or Gamayngal, as the Aboriginal group residing across the northern parts of Botany Bay. Many of these sources further identify the Kameygal (Gameygal) as being part of the Dharug language group. An original anonymous source, now attributed to Governor Arthur Phillip, Judge-Advocate David Collins and Captain John Hunter in 1790-1792 spelt the group name as ‘Kamey-gal’ and may be derived from the Aboriginal name Ka-may (alternatively Kamay or Gamay) for Botany Bay. Contemporary references also refer to ‘Kamay’ as the name for Botany Bay in the Dharawal language (National Museum of Australia [NMA], 2024).

The determination of Aboriginal language groups and boundaries prior to European contact has been a point of academic interest and study by European linguists and anthropologists. This can result in a Eurocentric understanding of the language and group dynamics of Aboriginal people throughout the earliest stages of European colonisation. It has been the result of more recent studies that the interactions between language groups such as those living in coastal environments and those living further inland have become increasingly understood and identified as having greater interconnectedness (Irish, 2017). The identification and recording of Aboriginal groups, kinship groups and language groups by early colonists was also difficult, incomplete and contradictory (Conroy, 2017: 63).

5.1.2 Material Culture

The Darug peoples were recognised as having distinctive toolkits for men or women (McDonald, 2008: 24). Men’s gear included several forms of spears, clubs, spear throwers, boomerangs, shields and *mogo* (a type of hafted stone hatchet). Women’s gear included fishing paraphernalia such as hooks, lines and sinkers, digging sticks and containers made of materials such as wood and shell (e.g. Attenbrow, 2010b). Netted items such as bags made from plaited plants fibres were utilised by both genders (Attenbrow, 2010: 91). Canoes made from bark were also commonly used (Attenbrow, 2010a: 87).

Organic materials such as woods, animal and plant fibres would have been used to make tools and weapons used for subsistence strategies such as hunting, fishing and other food collection methods. Implements would have included such items as hunting spears, spear-throwers, fishing hooks and lines, stone hatchets, clubs, digging sticks, baskets, net bags and other containers, as well as canoes (Conroy, 2017). Many items such as these were taken in the early contact period by Europeans. Cook's visit to Botany Bay in 1770 took a number of items from their voyage to return to England. Included in this collection is a bark shield that has been identified from documentary and pictorial evidence as one taken by Cook during this first visit to Botany Bay. A description and picture of the shield collected was made by Banks during the Endeavours visit in Northern Queensland later in the year that helps to identify the shield as the one in the British Museum collection today. The shield has been determined to have been made of Red Mangrove (*Rhizophora stylosa*) which is located over 500 km away from Botany Bay. This attests to the potential long distance trade networks that Aboriginal people would have participated in (Attenbrow et al, 2014).

Implements made from stone material tend to survive in the archaeological record better than organic materials. Studies of excavated material culture assemblages from the broader Sydney basin, focused around the Hawkesbury and Nepean Rivers suggest that Late Pleistocene and/ Early Holocene Aboriginal people utilised silicified tuff and other raw materials such as silcrete, quartz and quartzite (McDonald, 2008; Williams et al. 2014).

5.1.3 Shelter

During the time of European contact it was noted that the Darug people utilised two main forms of shelter. Either using existing rock shelters or building small huts from sheets or bark, and tree branches. Early colonial descriptions refer to the shelters of Darug peoples living on the coast as larger than those inland and “formed of pieces of bark from several trees put together in the form of an oven with an entrance, and large enough to hold six or eight people” (Collins 1798 [1975: 460]). How long these types of shelters were occupied for and how or why peoples moved about the landscape is not universally agreed upon however it has been suggested that they may have been occupied from months at time and regularly returned to.

5.1.4 Resources and Land Use (Middens)

Historical sources all suggest that the Darug- and Dharawal-speaking peoples of Kamay would have exploited the many resources of the marine and freshwater environments of Botany Bay, including the Georges and Cooks Rivers. Food sources such as fish and shellfish as well as other resources from estuarine, riparian and marine environs would have been readily available. Several historical records attest to the exploitation of these resources by Aboriginal people in the area. (Bradley, 1792 [1969: 133]; Collins, 1798 [1975: 456, 461, 495]; Phillip 1788 in Attenbrow, 2010: 63). Inland, the historical records suggest that terrestrial mammals were more frequently exploited (AECOM, 2019).

The topography and landforms of the environs surrounding the Project Area are predominantly soft-sediment in character, with few outcroppings of rock or shelters. This lends the area to the potential for more open sites such as middens. The survivability of these sites has been heavily impacted and influenced by later European land use and disturbances. Lime burning practices by European settlers in the area has vastly reshaped the presence of the middens of the northern shore of Banksmeadow and Botany Bay (Conroy, 2017).

Shell middens featuring marine and estuarine mollusc species are relatively common, featuring Sydney Rock Oyster (*Saccostrea glomerata*) and cockle species (e.g. *Anadara* spp.) (Attenbrow, 1990; 1994a; 1994b). Natural shell beds have been identified, potentially complicating archaeological interpretations in some instances (Attenbrow, 1984; McIntyre-Tamwoy, 2003). Middens are common close to estuary mouths or areas of fresh and marine water confluence.

5.1.5 Ceremonial Behaviour

Evidence for ceremonial or ritual behaviour amongst Darug-speaking peoples can be found in the writings of a number early observers, with documented ‘ceremonial’ activities including corroborees, male initiation ceremonies, ritual combats and various burial, body adornment and personal decoration practices (Attenbrow, 2002a; Attenbrow 2010: 126-42).

5.2 Post-Contact History

5.2.1 First Contact with Europeans

On 29 April 1770, the Endeavor under the command of the Lieutenant Cook reached Botany Bay. Cook’s diaries describe the anchoring near the southern shore of the bay and their attempted landing on the shore. Those on the ship noticed on shore several huts, surrounded by men, women and children. Upon attempting to approach the shore via boat it became clear that the Aboriginal people were opposed to their landing there. Two men remained as the group retreated away from the boat. Sir Jospheh Banks, who was a part of this 1770 expedition, described the Aboriginal men who remained as follows (Banks, as referenced in Conroy, 2017: 65):

“... painted with white, their faces seemingly only dusted over with it, their bodies painted with broad strokes drawn over their breasts and backs resembling much a soldiers cross belts, and their legs and thighs also with such like broad strokes drawn round them which imitated broad garters or bracelets... [each had a wooden weapon] about 2 1/2 feet long, in shape much resembling a scepter... [and they] seemed to talk earnestly together, at times brandishing their crooked weapons at us in token defiance’.

Cook’s description includes acknowledgement of his own violence at shooting at the two men and their response in throwing projectiles at the landing party in return. Whilst this interaction and initial contact was aggressive, later contact must have resulted in dialogue between the Aboriginal people and Cook’s party as there are early records of language from the period of time that the expedition stayed in Botany Bay (Cook, as referenced in Conroy, 2017: 66):

“...”I thought that they beckon’d us to come ashore; but on this we were Mistaken, for as soon as We put the Boat in they again Came to oppose us upon which I fir’d a Musquet between the 2 which had no other effect than to make them retire back to where their bundles of darts lay & one of them took up a Stone & threw at us which caused my firing a Second Musquet load with small shott, & altho’ some of the shott struck the Man yet it had no Effect other than to make him lay hold of a Shield or Target to defend himself, immediately after this we landed which we had no sooner done then they throw’d 2 darts at us which obliged me to fire a third shott soon after which they both made off.”

Local Aboriginal people avoided the Europeans in subsequent days, despite expeditions to shore by Cook and Banks to reestablish contact with the local population.

5.2.2 The First Fleet of 1788

Despite the animosity of Cook's 1770 expedition, the return of the British on 17 January 1788 resulted in more amicable relations between local Aboriginal people and crewmen of the First Fleet.

As recounted by Second Lieutenant Philip Gidley King (King, as referenced in Conroy, 2017: 69–70) about their encounter:

“They [the natives] immediately got up and called to us in a menacing tone and at the same time brandishing their spears or lances. However, the governor showed them some beads and a ordered a man to fasten them to the stem of the canoe. We then made sign that we wanted water, when they pointed round the point on which they stood and invited us to land there. On landing, they directed us by pointing to a very fine stream of fresh water.”

Upon returning to shore, King recounted the offering of gifts by the local Aboriginal people. Additionally, King recounted an element of connection through himself missing a tooth, which in local Aboriginal custom reflected rites of initiation and authority (Attenbrow, 2002b). It should be noted, however, that pleasantries were not universal across all encounters of Aboriginal people and crewmen of the First Fleet. Watkin Tench recounted “...not less than 40 persons, shouting and making many uncouth signs and gestures” (Tench, 1789: Chapter 8) regarding the Aboriginal response to the European return. Private John Easty recounted a number of fires of local Aboriginal people on Point Solander who, upon noticing the European ships “came down to the shore and shouted at us and held up their weapons over their heads and shook [sic] them at us.” (Easty, as referenced in Conroy, 2017: 71).

It should be noted that with the British, French ships followed just days after. Jean-Francois de Galaup, Comte de la Perouse was charged by Louis XVI to explore the south Pacific, and specifically Australasia, landing in Botany Bay on 24 January 1788, and remained for six weeks (Hill, 2009). The present-day neighbourhood of La Perouse is named after the French captain.

5.2.3 Resistance

Acts of Aboriginal resistance to the spread of European occupation across the Sydney region is well documented. Of these records some of the earliest and well known of these acts of resistance is the records relating to Bidjigal man Pemulwuy. Pemulwuy was recognised as a leader of numerous raids and skirmishes across settler farms around the south-Sydney region, including Botany Bay.

On 9 December 1790, John McIntyre was speared, presumably by Pemulwuy, potentially in retaliation to McIntyre's suspected killing of Aboriginal people (Tench, 1793: Chapter 12; Nicol and Sewell, 1793: Chapter 8). Governor Phillip ordered an expedition against the Bidjigal and Pemulwuy (Moore, 1987: 117–118).

From 1792, Pemulwuy persuaded other Aboriginal groups to join his resistance against European oppression and expansion. In December 1795, Pemulwuy launched an attack on a work party at Botany Bay, which left him injured (Jo MacDonald Cultural Heritage Management, 2005 and Hill, 1988: 99). In March 1797 Pemulwuy was injured in an armed confrontation in Paramatta and was taken to Parramatta hospital.

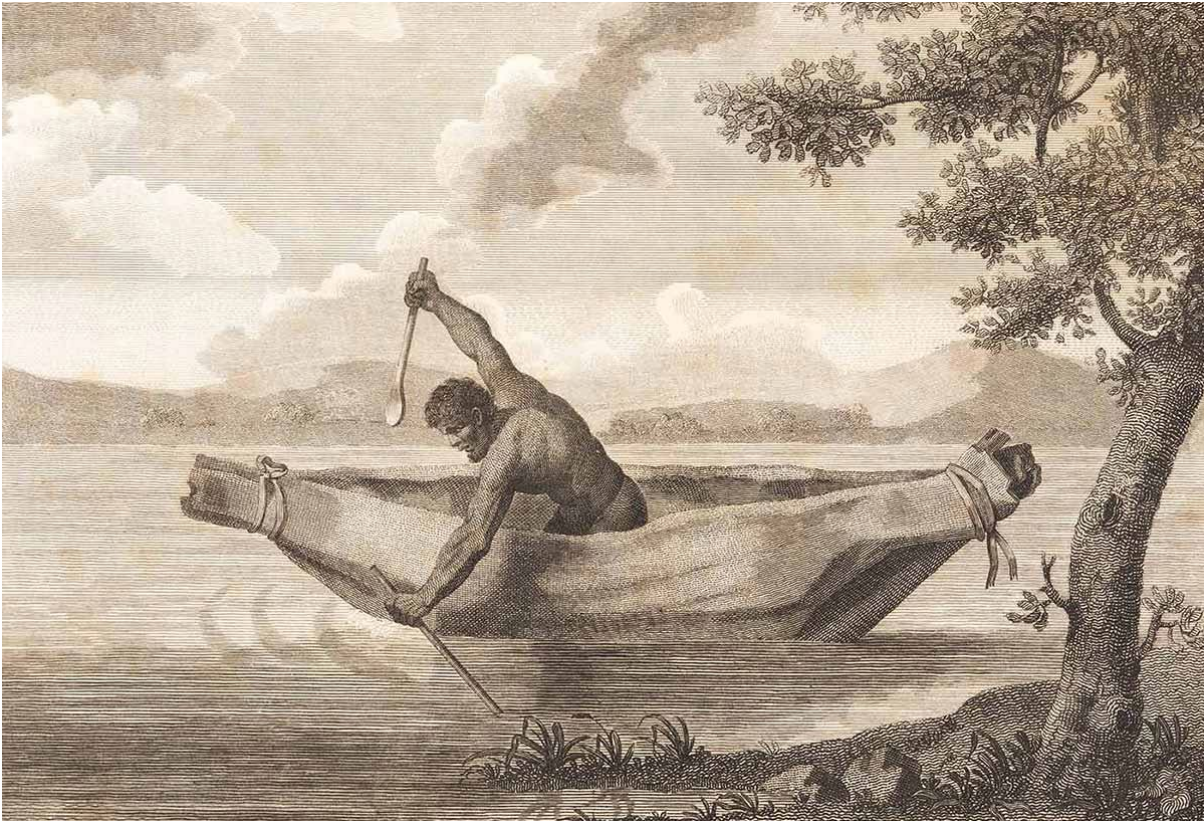


Figure 5.1 The Lone Engraving of Pemulwuy by Samuel John Neele (1804). In James Grant's "A Narrative of a Voyage of Discovery"

Source: <<http://trove.nla.gov.au/work/186496999>>.

Despite this and his injuries he managed to escape and was said to have been seen shortly after nearing the Georges River "...*having perfectly recovered from his wounds*" (Collins, 1798 [1975: 70]). Pemulwuy remained at large and active in acts of resistance until his death in 1802 having been shot. After his death he was acknowledged as a "an active, daring leader of his people" and "brave and independent character" (King to Hobart, 30 October 1802; King to Banks 5 June 1802). Resistance activities continued across the region after his death by his son Tedbury into the early 1800s (Purvis, 2016: 9).

5.2.4 Displacement and Relocation

Estimates towards the Aboriginal population of the Sydney region at the time of European contact range from 1,500–3,000 people (Smith et al, 2006; Conroy, 2017: 60). While slow, European expansion towards Botany Bay had significant impacts to local Aboriginal populations in the late 18th and early 19th centuries. The impacts of disease struck earlier, however, as an epidemic of smallpox decimated local Aboriginal populations in 1789 (Curon, 1985: 9). A second wave of smallpox swept the region in the 1830s, as influenza and syphilis contributed as well (Conroy, 2017: 76). It was reported that by the 1820s, only 20 Aboriginal people lived within the Botany region, however this is likely an underestimation (Conroy, 2017: 77–78).

By the mid-19th century, nearby La Perouse became a refuge for displaced Aboriginal people from the surrounding regions, likely seeking isolation in the least developed area of the broader Botany region.

The market gardens of Veterans Swamp – within which the Project Area is situated – was as the easternmost boundary of the European colony by the 1850s. It is reported that approximately 50 Aboriginal people inhabited the La Perouse Reserve by 1881 (Conroy, 2017: 81–82). This camp became a cultural refuge as well, as notable Aboriginal people such as George and Emma Timbery, considered to be the mother and father of the La Perouse Reserve promoted fishing and shell-working respectively (Vaughn, 2023).

At the turn of the 20th century, the Aborigines Protection Board halted the provisioning of food and resources to the La Perouse Reserve and repeatedly threatened to relocate residing Aboriginal people. Pushback from the community – both Aboriginal and European – resulted in the reversal of this position, and the resuming of supplying rations (Conroy, 2017: 82–83). Supporters of the Aboriginal community specifically the shell-working industry of the La Perouse Reserve as an example of Aboriginal independence and contribution to the local tourism economy (Nugent, 2012: 216).

Botany Bay became a focal point of the movement towards Aboriginal rights, as La Perouse locals Jack Patten, Joseph Timbery, and Wesley Simms all played major parts in the 1938 Day of Mourning. Through the 20th century, Botany Bay and La Perouse maintained a strong Aboriginal identity as the local population swelled driven by post-Second World War migration. Residents of La Perouse filed a land claim for ownership of the La Perouse Reserve lands. In 1984, the newly formed La Perouse Local Aboriginal Land Council was granted the title to the area (Conroy, 2017: 84).

6.0 Archaeological Context

6.1 Regional Context

6.1.1 Chronology

Aboriginal habitation of the broader Sydney region is considered to extend back to approximately 35,000 years BP (Jo McDonald Cultural Heritage Management [JMDCHM], 2005), with continuous occupation of the area being acknowledged through to contact with Europeans in 1788 (Williams, *et al.*, 2021). More regionally, Aboriginal occupation of nearby Parramatta and Nepean River has been determined to extend to between 30,000 and 36,000 years BP (AHMS, 2015; Williams *et al.*, 2012; 2014). These Pleistocene ages, however, are in the minority of dated samples originating from the Sydney region, with the vast majority being within the late Holocene, and most occurring within the last 2,000 years BP (Przywolnik, 2007). This directional trend in ages can possibly be attributed to steadily increasing Aboriginal population through the late Pleistocene and Holocene, however, is more like due to preferential preservation of more recent archaeological material and Aboriginal sites (*sensu* Hiscock, 2008). The Sydney Basin bioregion has also been identified as a possible refuge during and prior to the Last Glacial Maximum (LGM) when resource availability was scarce (Williams *et al.*, 2013).

6.1.2 Common Site Types

6.1.2.1 Open artefact sites

Open artefact sites, here referring to an Aboriginal site featuring one or more lithic artefacts, dominate the local archaeological landscape, and are most abundant adjacent to waterbodies and creeklines (e.g. Kohen, 1986; Artefact Heritage, 2020). Silcrete is the dominant raw material type, with smaller proportions of chert, tuff, quartz, quartzite, petrified wood and igneous rocks such as basalt and latite (e.g. JMDCHM, 2005; Austral, 2007; Haglund and Associates, 2007; AECOM, 2019). Common tool types include backed blades, as well as edge ground axes being identified (Comber, 2015).

It is important to note that a consistent message across archaeological reports is that the presence or absence of Aboriginal sites cannot be adequately characterised based on surface representation alone (*sensu* JMDCHM, 1997).

The Project Area and environs are not known for its lithic raw material sources. Raw materials for stone tool manufacture are typically understood to have been traded in via networks connecting local Aboriginal people with more distant groups (Attenbrow, 2002b). Artefacts recovered from the broader region of the Project Area predating 8,500 years Before Present are typically comprised of silicified tuff, quartz and some unheated silcrete (Urbis, 2020: 16). Smaller proportions of chert, petrified wood and igneous rocks such as basalt and latite have also been recorded (e.g. JMDCHM, 2005; Austral, 2007; Haglund and Associates, 2007; AECOM, 2019). Cobbles from the Hawkesbury and Nepean Rivers have been thought as a possible raw material source (McDonald, 2008; Williams *et al.* 2014).

6.1.2.2 Middens

Shell middens are relatively common, featuring Sydney Rock Oyster (*Saccostrea glomerata*) and cockle species (e.g. *Anadara* spp.) (Attenbrow, 1990; 1994a; 1994b) however natural shell beds have been identified, potentially complicating archaeological interpretations in some instances (Attenbrow, 1984; McIntyre-Tamwoy, 2003). Middens are common close to estuary mouths or areas of fresh and marine water confluence. While local middens are typically comprised of molluscan remains, the skeleton of a butchered dugong (*Dugong dugon*) has been recorded approximately 7 km to the northeast of the Project Area (Etheridge et al., 1896; Haworth et al., 2004). Middens have also been associated with ancestral Aboriginal remains across southeast Australia (e.g. Littleton, 2007) (see **Section 6.2**).

6.2 Local Archaeological Context

The Aboriginal Heritage Information System (AHIMS) database, administered by Heritage NSW, contains records of all Aboriginal objects reported to Heritage NSW in accordance with Section 89A of the NPW Act. It also contains information about Aboriginal places, which have been declared to have Aboriginal cultural significance. Recorded Aboriginal objects and declared Aboriginal places are defined under the NPW Act as ‘Aboriginal sites’.

A search of the AHIMS register was undertaken on 24 April 2025 covering an approximate 4 km buffer centred on the Project Area (i.e., ‘the AHIMS search area’; AHIMS search #998117) identified 60 Aboriginal sites. Of these, one (1) Aboriginal site status was ‘Not a Site’, with the remaining 59 listed as ‘Valid’ (**Table 6.1**). Records of these searches are provided in **Appendix 1** of this report.

Table 6.1 AHIMS Search Results

Site Type	Count (n)	%
Rockshelter	28	47.46
Midden	19	32.20
Potential Archaeological Deposit (PAD)	5	8.47
Open Artefact Site	4	6.78
Art (Pigmented or Engraved)	2	3.39
Modified Tree (Carved or Scarred)	1	1.69
Total	59	100%

*An updated AHIMS search (AHIMS search #1062779) was conducted on 5 November 2025 covering the same geographic area as the AHIMS search #998117 conducted on 24 April 2025. There was no change in the results for the AHIMS search area between 24 April 2025 and 5 November 2025.

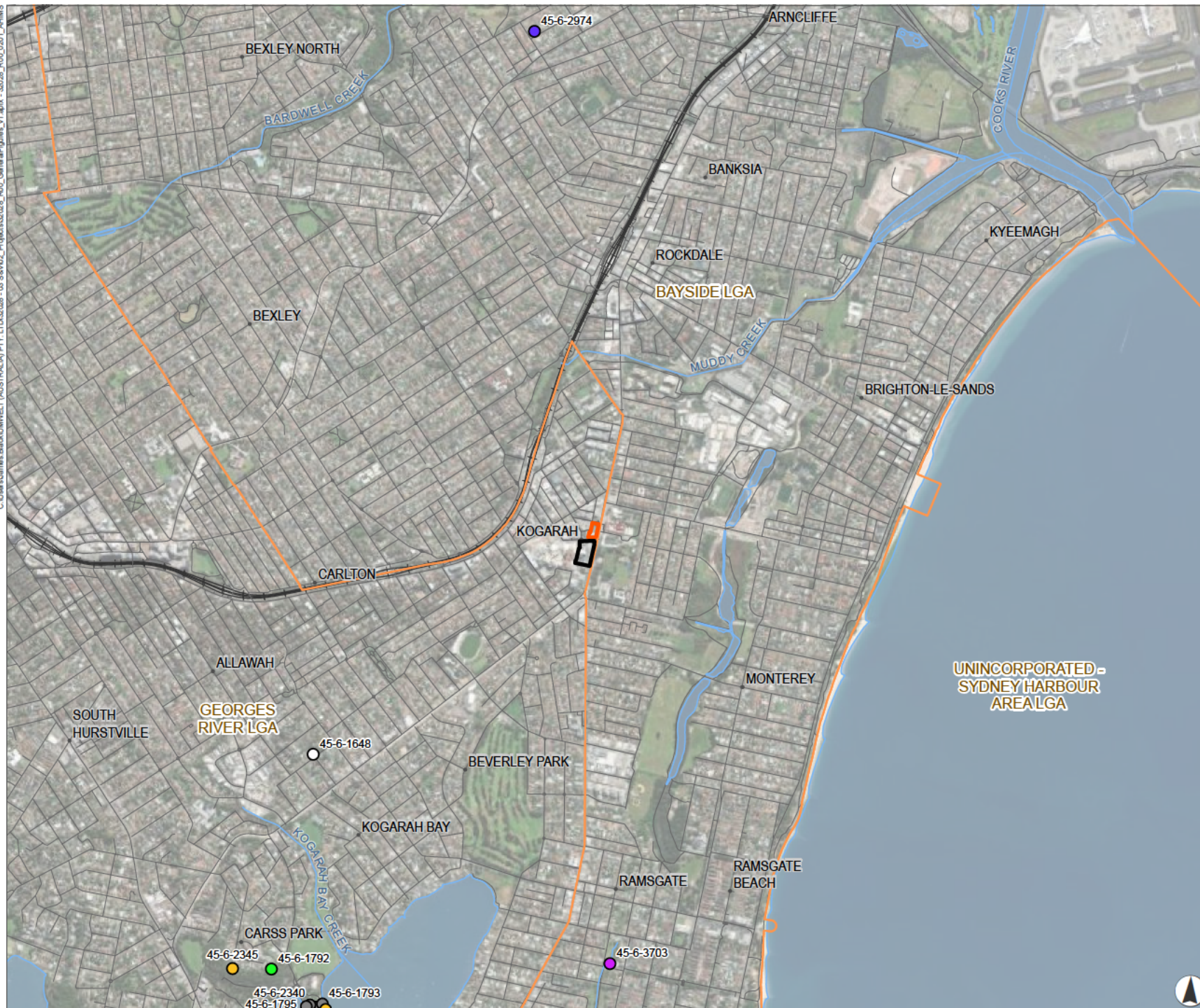


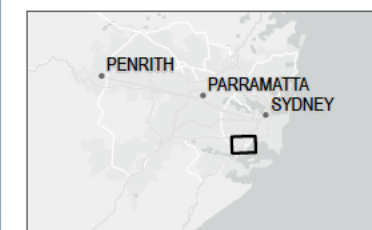
FIGURE 6.1
Aboriginal sites within the AHIMS search area

Legend

- New Clinical Tower (Hogben St)
- St George Private Hospital
- Local Government Area
- Road
- Railway
- Watercourse
- Waterbody

Rationalised site type

- Art (Pigment or Engraved)
- Midden
- Modified Tree (Carved or Scarred)
- Open Artefact Site
- Shelter, Midden
- Shelter, Open Artefact Site



Scale 1:30,000 at A4
GDA2020 MGA Zone 55



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Rockshelters are the most common Aboriginal site type within the AHIMS Search Area comprising 47.46% of recorded Aboriginal sites¹. Rockshelters are most commonly recorded along watercourses and the coastline where the sandstone bedrock outcrops (**Figure 6.1**). Similarly, most recorded Aboriginal sites being recorded in relatively undeveloped areas such as public greenspaces and parklands. The lack of Aboriginal sites recorded inland is likely the result of the extent of land disturbance associated with urbanisation and industrialisation of the Project Area and environs through the 19th century to present.

As is typical of Aboriginal sites close to the coastline, sites containing anthropogenically deposited shell are commonly recorded site features within the AHIMS search area, comprising 32.20% (n=19) of Aboriginal sites, and being documented as a site feature within 59.32% (n=35) of recorded Aboriginal sites². Aboriginal sites follow a strong correlation with water courses, with the majority of Aboriginal sites being recorded near or directly adjacent to water sources – specifically shorelines and rivers. Where described, shell species comprising middens are typically cockles (*Anadara* spp.) and rock oysters (*Saccostrea* spp.) and representative of local ecologies. Middens in southeastern Australia also are commonly associated with ancestral Aboriginal remains (e.g. Littleton, 2007). Approximately 5 km northeast of the Project Area along the northern shoreline of Botany Bay, a midden (Buoy; Botany Shell Midden, AHIMS ID #45-6-0629) was recorded comprising ancestral Aboriginal remains of two (2) individuals amongst *Anadara* sp. shell.

Art sites have been identified in 13.56% of recorded Aboriginal sites within the AHIMS search area. Art is commonly recorded in association with other site features, specifically middens and located within rockshelters. ‘Bibby Street;Carlton’ (AHIMS ID #45-6-1648) comprised an art site approximately 1.9 km to the southwest of the Project Area. ‘Bibby Street;Carlton’ (AHIMS ID# 45-6-1648) was recorded as an Aboriginal site featuring four (4) engravings into a sandstone bench on a hillslope with a moderate gradient. The engravings are interpreted to comprise one (1) each of a boomerang, a serpent, a turtle, and an oval shield. The sandstone bench on which the motifs are engraved was situated within an urban residential property scheduled for subdivision. The site was recorded as being in good condition, however no images of the engravings were submitted, and no further details are recorded from its original registration to the AHIMS database in 1984.

No Aboriginal sites were recorded within the Project Area. With the nearest recorded Aboriginal site being ‘Bibby Street;Carlton’ (AHIMS ID #45-6-1648) 1.9 km to the southwest of the Project Area. A culturally modified tree was recorded approximately 2.3 km to the southeast of the Project Area (‘Lou’s Healing Place’ [AHIMS ID #45-6-3703]). A cluster of five (5) Aboriginal sites was recorded approximately 2.9 km to the south of the Project Area on a headland on Kogarah Bay comprising middens, open artefact sites, and a shelter.

6.3 Previous Assessments

The broader region surrounding the Project Area has been subject to a diverse range of Aboriginal cultural heritage assessments and archaeological investigations, primarily associated with infrastructural and industrial developments. For contextual purposes, the results of a selection of these investigations, including those undertaken within and/or near the current Project Area, are summarised in **Table 6.2**.

¹ For the purposes of this report, rockshelters are defined as closed Aboriginal sites, within which other Aboriginal site features (e.g. midden, surface artefacts, and art) might be present.

² For the purpose of this report, the dominant Aboriginal site feature determines the site type. Certain Aboriginal sites can comprise multiple site features (e.g. rockshelters can comprise closed artefact sites, art [pigment or engraved], and/or midden as site features).

Table 6.2 Previous Aboriginal Cultural Heritage and Archaeological Assessments

Author/Assessment	Summary
Aboriginal Heritage assessment Long Bay Correctional Complex Hospital upgrade. Prepared for the Justice Health, within the Department of Health and the Department of Corrective Services [DCS] by Mary Dallas and Dan Tuck, 2005.	An Aboriginal Heritage Assessment was conducted as part of the application for the proposed construction of a new hospital within the Long Bay Correctional Complex located approximately 10 km east of the Project Area. A search of the AHIMS database identified 180 Aboriginal sites within the study area. Archaeological survey of the study area determined that the sand sheets present within the study area had been impacted by landscaping, grading and drainage channels. The remaining sand deposits were assessed as being unlikely to contain sub surface archaeological material. Midden and rock engraving sites and shelters were identified to be most Aboriginal site types, with sites such as stone artefacts sites being most vulnerable to the impacts resulting from disturbance associated with local infrastructure and development. No further archaeological investigation was recommended aside from the request for the La Perouse LALC to have to be present during works for monitoring.
Heritage Impact Statement: CBD South East Light Rail Project. Prepared for Acciona and Transport NSW by GML, 2019.	As part of a Heritage Impact Statement, test excavations were conducted within areas of PAD identified in the CBD South East Light Rail Project between the Sydney CBD and Randwick, approximately 8 km to the north of the Project Area. Within one (1) excavation, approximately 22,000 stone fragments exhibiting signs of flaking were identified up to 1 m below ground surface. Subsequent analyses of the salvaged artefacts identified that 99.6% (Owen <i>et al.</i>, 2019: 11) of the assemblage was comprised of flint sourced from the River Thames in London, England (Owen <i>et al.</i>, 2019: 14), and transported as ballast in ships travelling to Australia during the 18th and 19th centuries where some were discarded. GML suggested that this transported flint ballast was then collected by local Aboriginal people, flaked and distributed via trade networks. Complicating the analysis was the interpretation that the majority of flint fragments displayed taphonomic damage – likely from incidental impact as the ship moved during its voyage rather than deliberate flaking by people (Owen <i>et al.</i>, 2019: 10). The results of the lithic analysis highlighted the adaptability and innovation of local Aboriginal people to incorporate new materials and technologies into their economic toolkit.
ACHA for Sydney Gateway Project. Prepared for the Transport for NSW and Sydney Airport Corporation by Artefact Heritage Service Pty Ltd, 2019.	An ACHA was undertaken for the proposed construction of a series of link roads, upgrade works for intersections and operational infrastructure, located approximately 2 km northeast of the Project Area. A desktop assessment and archaeological survey in consultation with RAPs was conducted. A search of the AHIMS database identified eight (8) Aboriginal sites recorded near the study area, with no sites located within the study area. Archaeological survey was conducted by Kelleher Nightingale Consulting. The survey did not identify any Aboriginal objects or sites, however two (2) areas of potential for natural soil deposits to remain were identified for further geomorphological assessment to determine if areas of PAD remained intact. Previous archaeological investigations have identified a long period of Aboriginal occupation prior to European contact across the Botany Bay area. Investigations also indicated high levels of disturbance affecting the potential for identifying Aboriginal objects within the landscape. The study also concluded that subsurface soils containing Aboriginal objects were likely present.

Author/Assessment	Summary
Aboriginal Archaeological Survey Report for the Botany Rail Duplication. Prepared for Gateway to Sydney Joint Venture on behalf of Australian Rail Track Corporation, 2019.	An Aboriginal Archaeological Survey Report was undertaken for the proposed second rail track to be constructed within the existing rail corridor between Mascot and Botany along the Botany Rail Line located approximately 750 m north of the current Project Area. A desktop assessment was conducted prior to archaeological survey. An archaeological survey was conducted by Kelleher Nightingale Consulting in consultation with La Perouse and Metropolitan LALCs in 2018 and further surveys were conducted by Artefact in 2019 to gather further information for archaeological assessment of the study area. No new Aboriginal sites or areas of PAD were identified during the 2019 site inspections. Consultation with the La Perouse LALC regarding the survey was conducted following the completion of the survey to assure that the findings of the inspection were conducive to the understanding of the area. The survey report concluded that the extensive earthworks and disturbance caused by the of the rail corridor reduced the potential for identifying Aboriginal sites or objects within the study area. Within a broader regional context, the study area fits within the narrative of high levels of disturbance limiting the potential for identifying further Aboriginal sites and objects, however previous investigations and identification of sites across the area show and long period of Aboriginal occupation prior to European contact.
ACHA for Potts Hill to Alexandria transmission cable project. Prepared for TransGrid by AECOM, 2019.	An ACHA was undertaken approximately 8 km north of the current Project Area. A search of the AHIMS database of the study area with a 1 km buffer indicated 33 valid Aboriginal sites existed within the search area. Desktop assessment determined that most surface sites would occur on landform elements within 200 m of watercourses, with larger, more complex artefact assemblages associated with higher order streams. Local stone artefact assemblages comprise of raw materials of chert, tuff, quartz, quartzite, petrified wood and igneous materials. No Aboriginal sites were located within the study area, however sensitive landforms along the Cooks River were identified.
ACHA Report New Acute Services Building for the Prince of Wales Hospital Randwick NSW. Prepared for NSW Health Infrastructure by Mary Dallas Consulting Archaeologists (MDCA), 2020.	An ACHA was undertaken approximately 10 km northeast of the current Project Area. This assessment included a desktop assessment of the study area which was developed to have commercial and residential building situated at the base of a dune ridge, adjacent to a low-lying swampy area, which formed part of a broader, undulating coastal dune system extending across much of eastern Sydney, comprising Quaternary wind-blown sands, locally and elsewhere dated to around 35,000 BP. Archaeological assessment included consultation with RAPs for the local area and the La Perouse LALC. A search of the AHIMS database including a 4 km radius around the study area identified 7 Aboriginal sites. No sites were located within the study area, with the nearest site within 500 m being recorded as 'Prince of Wales Hospital Aboriginal; Hearth' (AHIMS #52-6-2495). Most sites recorded within the study area were middens and rock engravings, which was broadly typical of the eastern Sydney coastline between the Sydney Harbour and Botany Bay. Surface sites such as artefacts scatters were found across the region however most are destroyed or partially destroyed by high levels of disturbance from commercial and industrial infrastructure. Extant sites generally tend to survive in areas of parkland, golf courses and others that have avoided construction and bulk earthworks. During the archaeological survey conducted by MDCA, no Aboriginal objects were located within the study area. Recommendation for a further archaeological test excavation and monitoring of the study area was based on the assessment that potential archaeological evidence may occur within the study area. Results from further monitoring and archaeological investigation works will form a future ACHA.
ACHA for 350 King Street Mascot, NSW Kameygal Country. Prepared for	An ACHA was undertaken approximately 6 km northeast of the Project Area for the proposed construction of a multi-level warehouse and distribution center at 250 King Street Mascot.

Author/Assessment	Summary
LOGOS Development Management PTY Ltd by Urbis Pty Ltd, 2023	Desktop assessment of the study area included a search of the AHIMS database identified no Aboriginal objects or sites located within the study area. The nearest site was located 1 km northwest of the subject area (AHIMS #45-6-0751) and was recorded as an “Aboriginal Resource and Gathering, Non-Human Bones and Artefact”. Disturbance of the land within the study area was observed to have been significant due to the industrial history of the site. The assessment concluded that there was low potential for Aboriginal objects due to impacts from historical and modern disturbance. Consultation with RAPs occurred during the assessment process and a survey was conducted, during which no further Aboriginal sites or objects were identified. The study area was identified to be indicative of the levels of disturbance and impacts that have occurred across the Sydney region regarding both historical and modern commercial and industrial development. Previous archaeological investigations have provided context for a long occupation of the area surrounding Botany Bay, and that evidence of Aboriginal occupation may be retained within adequately preserved deep sand deposits.
ACHA for Baker Street Multi-Level Warehouse Banksmeadow. Prepared for Stockland by Artefact Heritage Services Pty Ltd, 2023	An ACHA was undertaken for the proposed construction of a two-storey warehouse at 2–8 Baker Street, Banksmeadow approximately 6 km east of the current Project Area. A desktop assessment and archaeological survey was completed in consultation with local RAPs and La Perouse LALC. Previous archaeological studies surrounding the study area are limited. A search of the AHIMS database was conducted but redacted. The archaeological survey identified no new Aboriginal sites or artefacts and the level of landscape disturbance suggested that it was unlikely for archaeological evidence to have survived. The context of artefact sites identified during previous investigations were typically associated with intact upper dune sand deposits and buried estuarine deposits. Disturbed sediments did not preserve Aboriginal objects. The study concluded that areas that have undergone disturbance as a result of urban, commercial or industrial development were unlikely to retain Aboriginal objects. However, should intact soil deposits be located there was a possibility for Aboriginal objects to be preserved. The findings of the study further demonstrated the level disturbance that has occurred across the environs surrounding the study area, and the likely impact on the preservation of Aboriginal sites and/or objects.
ACHA for 49 Stephen Road Industrial Facility Redevelopment, Banksmeadow. Prepared for ESR by Umwelt, 2024.	An ACHA was undertaken for the proposed demolition and redevelopment of an industrial warehouse facility in Banksmeadow approximately 6 km east of the current Project Area. A search of the AHIMS register for the assessment area identified no Aboriginal sites within the proposed development area, however Aboriginal sites were recorded within the surrounding landscape, particularly in relatively undisturbed areas along the coastline of Botany Bay. Desktop assessment identified that due to the extent of urban and commercial development through the 19th and 20th centuries, the likelihood of Aboriginal objects being preserved was considered low. The exception to this was within undisturbed sediments associated with the Botany Sand Beds within the Tuggerah soil landscape (Chapman <i>et al.</i>, 2009). Geotechnical investigations within the proposed development area identified truncated deposits of bleached sand, indicating a low likelihood of Aboriginal objects being preserved. The archaeological survey conducted in collaboration with RAPs identified no new Aboriginal sites or artefacts and the level of landscape disturbance suggested that it was unlikely for archaeological evidence to have survived.

6.4 Predictive Model

The review of existing environmental and archaeological context for the Project Area and regional environs presented in earlier sections of this methodology provides context for the generation of a preliminary predictive model for the potential Aboriginal archaeological resource of the Project Area. The predictive model presented below in **Table 6.3** has been drawn from publicly accessible information and technical studies undertaken across the Sydney region, including the AHIMS search results presented in **Section 6.2**.

Table 6.3 Predictive Model for Aboriginal Sites

Site Type	Potential
Modified Trees (scarred or carved)	Low: No culturally modified trees are recorded within the AHIMS search area. The Project Area and its surrounds is an entirely built landscape. A distance away from the Project Area (>1 km) are mature trees, however these are likely ornamental plantings rather than naturally occurring vegetation.
Earth Mounds	Low: Earth mounds have not been recorded within the AHIMS search area. The landscape surrounding the Project Area is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation.
Hearths	Low: No hearths have not been recorded within the AHIMS search area. The Project Area and its surrounds is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation.
Shell Middens	Low: Shell midden sites have been recorded within the AHIMS search area and are regionally common in coastal environs. The Project Area and its surrounds is 700 m from the nearest waterbody, and 1.7 km from the coastline.
Quarries	Low: No quarries for raw material extraction have been recorded within the AHIMS search area, and reference to geological mapping indicates no outcrops of suitable material, and are rarely recorded on a regional scale.
Open Artefact Sites	Low: Stone artefact sites have been previously recorded in the AHIMS search area. The Project Area and its surrounds is an entirely built landscape with extensive vegetation clearing and landscape modification. The results of geotechnical investigations within the Project Area have not identified intact soil profiles.
Grinding Grooves	Low: No grinding grooves have been recorded within the AHIMS search area. The Project Area and its surrounds is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation.

Site Type	Potential
Ancestral Aboriginal Remains	Low: Sites containing ancestral Aboriginal remains have been recorded approximately 5 km from the Project Area (Section 6.2). Sites containing ancestral Aboriginal remains are typically associated with rock shelters, or other cultural deposit such as shell midden adjacent to watercourses and the coastline. The Project Area and its surrounds is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation. No landforms associated with ancestral Aboriginal remains are recorded within the Project Area.
Rock Shelters with art and/or deposit	Low: Rock shelter sites will only occur where suitable sandstone exposures or overhangs possessing sufficient sheltered space exist, which are not present in the Project Area.
Aboriginal Ceremony and Dreaming Sites	Low: Aboriginal Ceremony and Dreaming Sites can only be determined during the consultation phase of the Aboriginal Cultural Heritage Assessment.
Contact Sites	Low: There are currently no recorded post-contact sites recorded within the AHIMS search area, however they are known to occur in the greater Sydney and CBD environs.

6.5 Summary

Based on the extant publicly available literature, and **Table 6.3** above, the following predictive statements regarding the likelihood of Aboriginal sites being present within the Project Area can be made:

- The preservation of Aboriginal objects in their in situ depositional context is dependent on the extent and nature of historical development and land surface modification.
- Rockshelters and shell middens are the most common Aboriginal site types within the AHIMS search area. However, rockshelters generally occur within areas associated with exposures of bedrock and escarpments which are entirely absent from the Project Area. Shell middens are generally identified within 200 m of fresh- and saltwater waterbodies. The Project Area is approximately 800 m from a waterbody.
- Stone artefacts and shell midden material are more likely to be found closer to water bodies including fresh- and saltwater sources.
- The lack of visible surface Aboriginal objects is not indicative of sub-surface Aboriginal objects.
- Relatively undisturbed sections of soil profiles have the potential to preserve Aboriginal objects. The results of geotechnical investigations within the Project Area have not identified intact soil profiles

7.0 Fieldwork Program

7.1 Objectives and Methods

The following sections present a summary of the fieldwork program for the ACHA. A methodology for the fieldwork program was presented to all RAPs in accordance with Section 4.3.1 and Section 4.3.2 of the Consultation Requirements, which is discussed in further detail in **Section 3.3** of this report.

The overarching objectives of the fieldwork program was to investigate the cultural heritage values associated with the material cultural resource of the Project Area by way of background research, archaeological survey, and consultation with RAPs.

The entirety of the survey of the Project Area was conducted on foot. A total of 3,572 m² was surveyed, and included the perimeter of the Project Area, and interior and exterior paths and roadways. Considering only a single landform was identified during the survey, and the relatively small investigation area, the survey comprised one (1) survey unit encompassing the perimeter of the Project Area (see **Table 7.1**).

The survey were conducted in collaboration with RAP representatives detailed in **Table 3.2**.

7.2 Results of Survey

Survey of the Project Area identified an entirely modified landscape (**Photo 7.1–Photo 7.8**). Nearly all of the Project Area represents existing infrastructure in the form of buildings or concrete and bitumen roads and pathways (**Photo 7.1–Photo 7.8**). The topography of the Project Area was observed to be flat to gently sloping with gentle undulations being particularly noticeable at the parking lot in the northern-most portion of the Project Area (**Photo 7.2**). The parking lot was observed to be at a higher elevation than the adjacent Princes Highway running along the eastern boundary of the Project Area (**Photo 7.6**), and was likely the result of excavation works to facilitate a flatter aspect for the road than the building up of the ground surface in the construction of the parking lot.

Observed vegetation comprised ornamental plantings only, particularly towards the northern boundary of the Project Area. Observed plants included mature native She-oak (*Casuarina cunninghamiana*) (**Photo 7.1** and **Photo 7.6**) and exotic hedges along the northern boundary of the Project Area (**Photo 7.3** and **Photo 7.6**). Exotic grasses parallel the pedestrian footpaths surrounding the Project Area (**Photo 7.5** and **Photo 7.8**).

Survey of the Project Area identified no Aboriginal sites or areas of PAD.

Table 7.1 Survey Coverage of the Project Area

Survey unit	Landform	Survey unit area (m ²)	Visibility (%)	Exposure (%)	Effective survey coverage (m ²)	Effective survey coverage (%)
1	Flat	3,572	20	10	71.44	2



Photo 7.1 View of Project Area from bridge over Princes Highway facing southwest

Source: Umwelt, 2025.



Photo 7.2 View of east slope in carpark at north of Project Area facing southwest

Source: Umwelt, 2025.



Photo 7.3 View of hospital campus from South Street facing southwest

Source: Umwelt, 2025.



Photo 7.4 View of proposed clinical tower location from South Street facing northeast

Source: Umwelt, 2025.



Photo 7.5 Northeastern corner of the Project Area from bridge over Princes Highway facing southwest

Source: Umwelt, 2025.



Photo 7.6 Eastern boundary of the Project Area from Princes Highway facing south

Source: Umwelt, 2025.



Photo 7.7 Southern boundary of the hospital campus from Project Area from Princes Highway facing west

Source: Umwelt, 2025.



Photo 7.8 Eastern boundary of the Project Area from Princes Highway facing north

Source: Umwelt, 2025.

8.0 Significance Assessment

The Burra Charter defines cultural significance in terms of aesthetic, scientific, historic and social values. Aboriginal cultural heritage is typically assessed according to its social and scientific significance; however other values may also be of importance. The assessment of cultural significance is critical in establishing mitigation and management strategies for cultural heritage (Pearson and Sullivan, 1995:21). The assessment of significance provides a guideline for determining appropriate mitigation and management strategies. The relationship between levels of significance and management strategies can be summarised as follows:

- **High significance** – the site should be conserved and protected from the impacts of development, where possible.
- **Moderate significance** – the site should be protected if possible, however, if impacts to the site are unavoidable, appropriate mitigation strategies should be implemented prior to impact.
- **Low significance** – the site should be protected if possible, however, if impacts to the site are unavoidable, the presence of the site should not impede the proposed development.

8.1 Cultural Significance

Cultural significance relates to the values that Aboriginal peoples assign an object, site or place. In assessing this significance, a range of factors may be considered, and this can extend beyond the physical presence of a site and its contents to intangible aspects of the cultural landscapes. Archaeological materials, cultural knowledge, natural resources and landscape attributes may all be considered. RAP consultation identified the following social or cultural values for the Project Area in conversations with Umwelt personnel:

- Prior to European occupation, the Project Area would have been an important place for Aboriginal peoples, with abundant resources and freshwater available.
- The Project Area and surrounding environs is located at the confluence of multiple Aboriginal groups.
- The Project Area and surrounding environs represented Australia's region's first contact between local Aboriginal groups and Cook's first charting of Australia's east coast in 1770. This first contact also resulted in the European explorers shooting at local Aboriginal people (Conroy, 2017: 70).
- Subsequent attempts at a permanent European colony from 1788 saw the region being the focal point of Aboriginal resistance to European expansion.

8.2 Scientific (Archaeological) Significance

The scientific (or archaeological) significance of Aboriginal sites relates to their potential for providing information about past Aboriginal culture/s and is commonly assessed on the basis of research potential, representativeness and rarity. Other criteria, such as aesthetic value and education potential, may also be relevant. As no new or previously identified Aboriginal objects or sites are recorded within the Project Area, an assessment of the archaeological significance of the Project Area cannot be undertaken.

9.0 Impact Assessment

9.1 Summary of Proposed Impacts

As detailed in **Section 1.4**, Akalan is proposing the upgrade of the existing St George Private Hospital, including a new emergency department as well as the construction of a new clinical tower

The proposed works for the new clinical tower include site preparation works and bulk excavation for the construction of the excavation of a five (5) storey basement and seven (7) storey building. Ground disturbance works will impact the entire footprint of the clinical tower component of the Project Area.

The proposed works to the main hospital campus include the retrofit of the existing building to facilitate development of an emergency department, as well as landscaping works such as regrading and surfacing, new plantings and installation of a concrete slab to support a medical gas storage system.

9.2 Archaeological Values

No new or previously recorded Aboriginal objects and/or sites were identified within the Project Area. Ground disturbance activities are proposed, including the bulk excavation for the new clinical tower, and minor landscaping and resurfacing works at the northern boundary of the main hospital campus. Geotechnical assessments (Tetra Tech Coffey, 2025) have not identified archaeologically sensitive subsurface sediments.

The potential for impact to Aboriginal objects is assessed as low.

9.3 Aboriginal Cultural Values

As described in **Section 3.3.2** and **Section 8.1**, in consultation with RAP representatives, the Project Area and environs contain high Aboriginal cultural heritage significance due to:

1. The abundant resources and ecologies amenable for habitation prior to European colonisation.
2. The region's importance in the Aboriginal experience from the post-contact expansion of European colonies.

The potential for impacts to these Aboriginal cultural values in the undertaking of Project works is considered low.

9.4 Avoiding and Minimising Harm

As identified in **Section 8.0** and **Section 9.3**, impacts to recorded and unrecorded Aboriginal objects, or impacts to Aboriginal cultural values in the undertaking of the proposed works is considered low.

9.5 Cumulative Impact Assessment

9.5.1 Ecologically Sustainable Development

Australia's National Strategy for Ecologically Sustainable Development (1992) defines ecologically sustainable development as: 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased'. Simply, Ecologically Sustainable Development is development which aims to meet the needs of Australians today, while conserving our ecosystems for the benefit of future generations.

9.5.2 Intergenerational Equity

When assessing likely harm on Aboriginal objects and places it is necessary to consider the principle of intergenerational equity. Intergenerational equity is:

“...the principle whereby the present generation should ensure the health, diversity and productivity of the environment for the benefit of future generations”.

In terms of Aboriginal heritage, intergenerational equity can be considered in terms of the cumulative impacts to Aboriginal objects and places in a region. If few Aboriginal objects and places remain in a region (for example, because of impacts by historic development or under previous AHIPs/ACHMPs etc), fewer opportunities remain for future generations of Aboriginal people to benefit from the preservation of their cultural heritage, places and objects. Information about the integrity, rarity or representativeness of the Aboriginal objects and places that may be impacted by a project, and how those tangible cultural heritage elements demonstrate the lifeways of Aboriginal peoples within the region, is pertinent to the consideration of intergenerational equity and the understanding of a project's contribution to cumulative impacts. Where there is uncertainty, the precautionary principle must be followed (DECC [former] 2009: 26).

No new or previously recorded Aboriginal objects and/or sites were identified within the Project Area. As identified in **Section 8.0**, the Project has low potential to impact Aboriginal objects, and low potential to impact the Aboriginal cultural values of the Project Area and its environs. As such, there are no potential cumulative impacts to intergenerational equity with regards to Aboriginal cultural heritage.

10.0 Management Recommendations

10.1 Rationale and Statutory Requirements

This ACHA will form part of an EIS submitted by Akalan to support their application for SSD approval under Division 4.1 of Part 4 of the EP&A Act. The Code of Practice (DECCW, 2010b) provides best practice documents for Aboriginal cultural heritage impact assessments in NSW. Both documents were considered in the formulation of the management strategy detailed in the following sections.

As detailed in **Section 9.0**, no Aboriginal sites have been identified within the Project Area, and impacts to currently unidentified Aboriginal objects is considered low.

If an Aboriginal Cultural Heritage Management Plan (ACHMP) is stipulated as a condition of approval, management procedures including, but not limited to, those presented in **Section 10.1.1** to **Section 10.1.3** below would be integrated into the ACHMP.

10.1.1 Aboriginal Cultural Heritage Awareness Induction

All relevant contractors and personnel should also be made aware of their legal responsibilities under the NP&W Act 1974 and the need to avoid impacts to Aboriginal objects and/or sites not identified in this ACHA.

10.1.2 Previously Unrecorded Aboriginal Objects and/or Sites

Management strategies relating to the identification of unrecorded Aboriginal objects identified within the Project Area throughout the life of the Project will comprise the following procedure:

1. All works would cease immediately in the area to prevent any further impacts to the object(s).
2. Notify the appropriate Environmental Manager and/or Project Manager immediately.
3. A qualified heritage consultant would be engaged to determine the nature, extent and scientific significance of the object(s). RAP representatives are to be notified in writing regarding the nature of the find and if required, proposed management actions. RAP representatives will be requested to provide comments within seven (7) days.
4. An AHIMS site card would be completed and submitted to Heritage NSW in compliance with Section 89A of the NPW Act. The site cards will be lodged within 21 days and a copy provided to those RAPs who wish to have a copy.
5. An Aboriginal Cultural Heritage Management Plan (if required as part of the Conditions of Consent) and any other Project environmental management systems or databases would be updated (as relevant) to address the new Aboriginal site.

10.1.3 Human Skeletal Remains

In the event that potential human skeletal remains are identified throughout the life of the Project (including construction, operations and decommissioning phases), the following standard procedure outlined below will be followed:

1. All work in the vicinity of the remains must cease immediately.
 2. The location must be cordoned off and NSW Police contacted. If the remains are suspected to be Aboriginal, Heritage NSW may also be contacted.
 3. Subject to any alternative instruction from the NSW Police, a physical or forensic anthropologist would be commissioned to inspect the remains *in situ* and make a determination of ancestry (Aboriginal or non-Aboriginal) and antiquity (pre-contact, historic or modern).
- Subsequent management actions will be dependent on the findings of the inspection undertaken under Point 3.
 - If the remains are identified as modern and human, the area will become a crime scene under the jurisdiction of the NSW Police.
 - If the remains are identified as pre-contact or historic Aboriginal, the site will be secured, and Heritage NSW and all RAP representatives notified in writing.
 - If the remains are identified as historic (non-Aboriginal), the site is to be secured and the Heritage NSW contacted.
 - If the remains are identified as non-human, work can recommence immediately.

10.2 RAP Recommendations

As detailed in **Section 3.2.3** and **Section 3.3.2**, RAPs provided cultural knowledge and feedback pertaining to the design and construction of the Project, including the recommendation that local Aboriginal knowledge should be incorporated as design elements as the Project is completed. Examples provided included art sourced from local Aboriginal artists depicting local Aboriginal stories. It is recommended that Akalan reference the *Connecting with Country Framework* (Government Architect NSW, 2023) in the design and operational phases of the Project.

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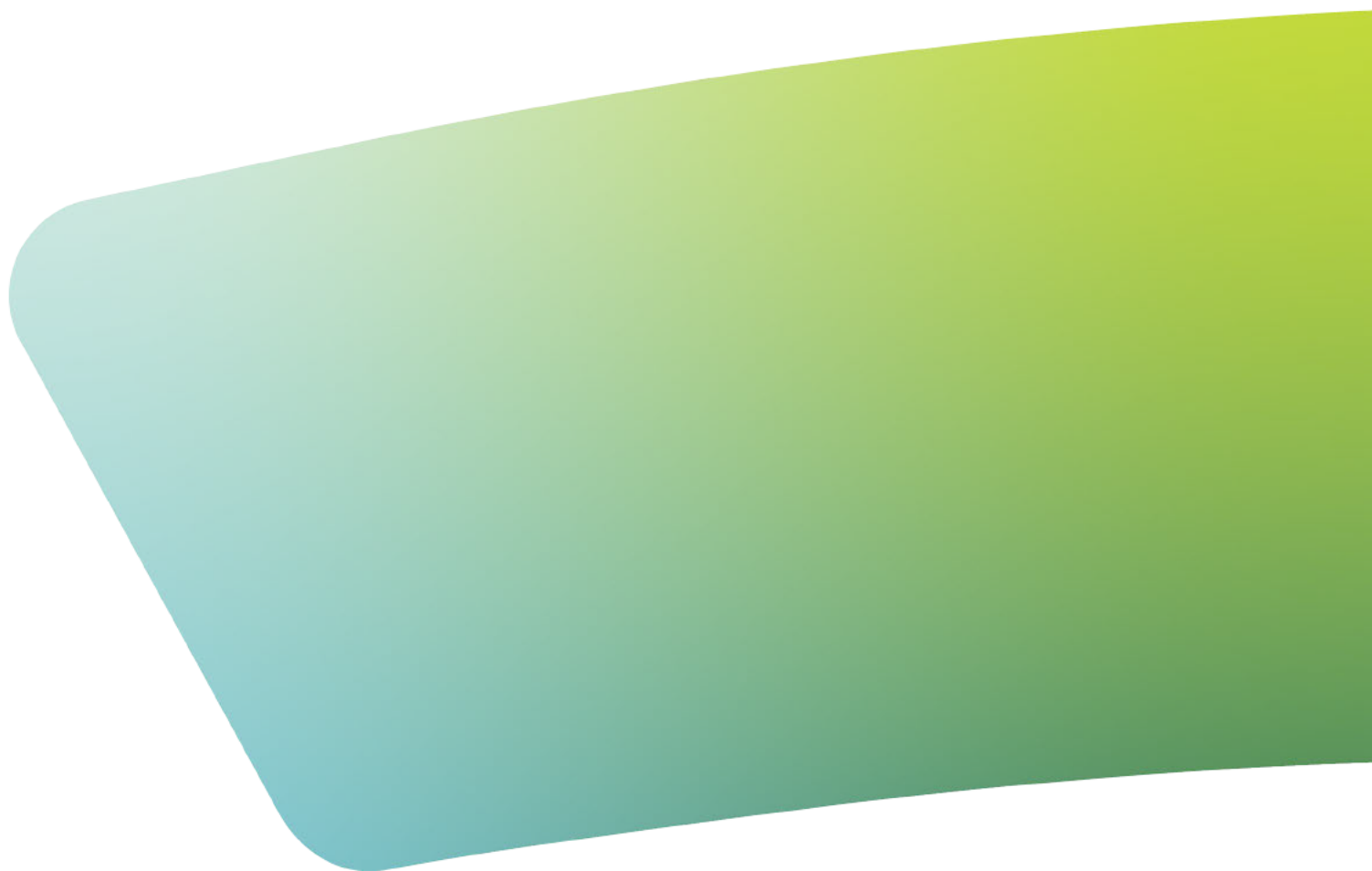
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Williams, A. N., McDonald, J., Atkinson, F., Toms, P. S., Hobbs, A., Barry, L., Sapienza, T., Wood, J.C. and Doelman, T. (2021). Was Aboriginal population recovery delayed after the Last Glacial Maximum? A synthesis of a terminal Pleistocene deposit from the Sydney Basin, New South Wales, Australia. *Journal of Archaeological Science: Reports*, 40, 103225.

Appendix 1

AHIMS Search Results



Umwelt (Australia) Pty Limited - Individual users

Date: 05 November 2025

75 York Street

Teralba New South Wales 2284

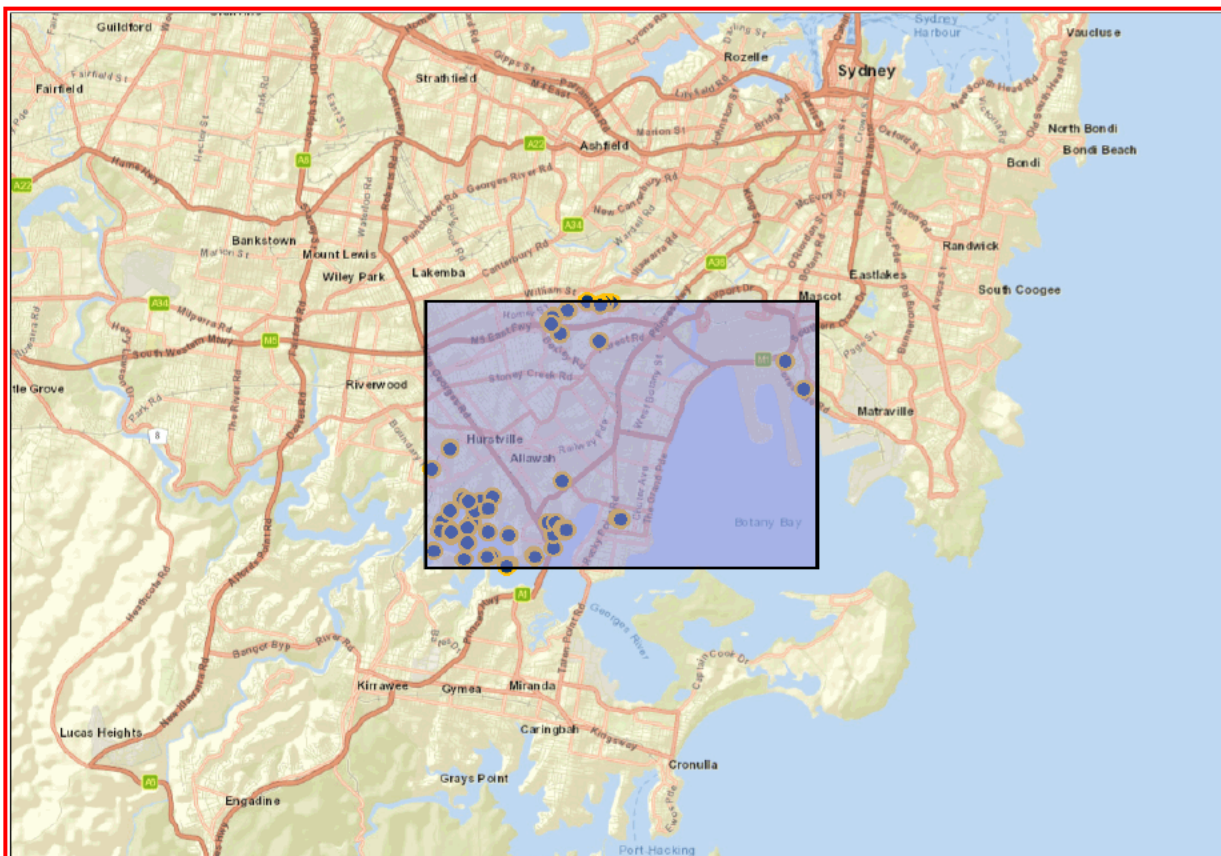
Attention: Brent Koppel

Email: bkoppel@umwelt.com.au

Dear Sir or Madam:

AHIMS Web Service search for the following area at Lat, Long From : -34.0009, 151.0767 - Lat, Long To : -33.9297, 151.2003. conducted by Brent Koppel on 05 November 2025.

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



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

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

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

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

Important information about your AHIMS search

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

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 32028-Nov 2025

Client Service ID : 1062779

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
45-6-2240	Kangaroo Point	AGD	56	324076	6236230	Open site	Valid	Shell : -, Artefact : -	Midden	
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-2241	Redin Reserve 2;	AGD	56	324070	6237670	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-2242	Redin Reserve 1;	AGD	56	323990	6237670	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
52-3-0739	Baldface Point;	AGD	56	324700	6236010	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	1333
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
52-3-0740	Bald Face Point;	AGD	56	324650	6235950	Closed site	Valid	Artefact : -	Shelter with Deposit	
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
52-3-0237	Oyster Bay;B1886 Cave;	AGD	56	323416	6236140	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-2340	Carss Park 2	AGD	56	326280	6237110	Open site	Valid	Shell : -, Artefact : -	Midden	
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-2341	Carrs Park 3	AGD	56	326370	6237090	Closed site	Valid	Artefact : -	Shelter with Deposit	
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-2345	Carss Park 1	AGD	56	325830	6237290	Closed site	Valid	Artefact : -	Shelter with Deposit	
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-2302	Donelly Park;	AGD	56	324100	6236980	Open site	Valid	Shell : -, Artefact : -	Midden	1333
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-2303	Lyle Williams Reserve;	AGD	56	324700	6236900	Open site	Valid	Shell : -, Artefact : -	Midden	1333
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-2304	Shipwright Bay 1;	AGD	56	325440	6236300	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	1333
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-2305	Shipwright Bay 2;	AGD	56	325470	6236240	Open site	Valid	Shell : -, Artefact : -	Midden	1333
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-0604	Oatley Point;Georges River;	AGD	56	322764	6237271	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	1276
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							
45-6-0605	Como;Caravan Head;	AGD	56	322526	6236380	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
	<u>Contact</u>	<u>Recorders</u>	<u>Permits</u>							

Report generated by AHIMS Web Service on 05/11/2025 for Brent Koppel for the following area at Lat, Long From : -34.0009, 151.0767 - Lat, Long To : -33.9297, 151.2003. Number of Aboriginal sites and Aboriginal objects found is 60

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 32028-Nov 2025

Client Service ID : 1062779

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
45-6-0606	Connells Point;Como;	AGD	56	323508	6236646	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	
	<u>Contact</u>	<u>Recorders</u>	Unknown Author					<u>Permits</u>		
45-6-0607	Hurstville	AGD	56	324213	6238031	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	
	<u>Contact</u>	<u>Recorders</u>	Kate Sullivan					<u>Permits</u>		
45-6-0629	Buoy;Botany Shell Midden;	GDA	56	333325	6241560	Open site	Valid	Artefact : -, Shell : -, Burial : -	Burial/s,Midden,Shelter with Deposit	
	<u>Contact</u>	<u>Recorders</u>	ASRSYS,Mr.Paul Irish,Coast History & Heritage					<u>Permits</u>		
45-6-2503	CP1;	AGD	56	323600	6237250	Open site	Valid	Shell : -, Artefact : -	Midden	
	<u>Contact</u>	<u>Recorders</u>	Doctor.Jillian Comber					<u>Permits</u>		
45-6-2414	Wolli_Creek 1.6;	AGD	56	326280	6243580	Closed site	Valid	Artefact : -	Shelter with Deposit	1452
	<u>Contact</u>	<u>Recorders</u>	Tranby College					<u>Permits</u>		
45-6-2415	Wolli_Creek 1.4;	AGD	56	325740	6243270	Closed site	Valid	Artefact : -	Shelter with Deposit	1452
	<u>Contact</u>	<u>Recorders</u>	Tranby College					<u>Permits</u>		
45-6-0566	Jubilee Mortdale Botany Bay	AGD	56	322400	6238800	Open site	Valid	Shell : -, Artefact : -	Midden,Open Camp Site	
	<u>Contact</u>	<u>Recorders</u>	P Menses					<u>Permits</u>		
45-6-2564	Wolli Creek 2.5	AGD	56	327250	6243760	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	
	<u>Contact</u>	<u>Recorders</u>	Tranby College					<u>Permits</u>		
45-6-2567	Wolli Creek	AGD	56	327250	6243760	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	
	<u>Contact</u>	<u>Recorders</u>	Tranby College					<u>Permits</u>		
45-5-2270	Poulsen Park	AGD	56	323840	6237880	Open site	Valid	Artefact : -	Open Camp Site	
	<u>Contact</u>	<u>Recorders</u>	Michael Guider					<u>Permits</u>		
45-6-2269	West Cr Cave;	AGD	56	323320	6237990	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
	<u>Contact</u>	<u>Recorders</u>	Michael Guider					<u>Permits</u>		
45-6-2416	Wolli_Creek 1.3;	AGD	56	325840	6243370	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	1452
	<u>Contact</u>	<u>Recorders</u>	Tranby College					<u>Permits</u>		
45-6-2417	Wolli_Creek 1.2;	AGD	56	325880	6243400	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	1452
	<u>Contact</u>	<u>Recorders</u>	Tranby College					<u>Permits</u>		
45-6-2418	Wolli_Creek 1.1;	AGD	56	325880	6243400	Closed site	Valid	Artefact : -	Shelter with Deposit	1452
	<u>Contact</u>	<u>Recorders</u>	Tranby College					<u>Permits</u>		
45-6-1367	Oatley Point;	AGD	56	323499	6237103	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	

Report generated by AHIMS Web Service on 05/11/2025 for Brent Koppel for the following area at Lat, Long From : -34.0009, 151.0767 - Lat, Long To : -33.9297, 151.2003. Number of Aboriginal sites and Aboriginal objects found is 60

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SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
	Contact	Recorders	ASRSYS					Permits		
45-6-1750	Oatley Point;	AGD	56	323030	6236880	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	Warren Bluff					Permits		
45-6-1785	Dover Park;	AGD	56	326000	6236550	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	Warren Bluff					Permits		
45-6-1792	Carss Bush Park;	AGD	56	326050	6237300	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	1333
	Contact	Recorders	Warren Bluff					Permits		
45-6-1793	Carss Bush Park;	AGD	56	326350	6237120	Open site	Valid	Shell : -, Artefact : -	Midden	1333
	Contact	Recorders	Warren Bluff					Permits		
45-6-1794	Carss Bush Park;	AGD	56	326310	6237100	Open site	Valid	Shell : -, Artefact : -	Midden	1333
	Contact	Recorders	Warren Bluff					Permits		
45-6-1795	Carss Bush Park;	AGD	56	326260	6237100	Open site	Valid	Shell : -, Artefact : -	Midden	1333
	Contact	Recorders	Warren Bluff					Permits		
45-6-1796	Carss Bush Park;	AGD	56	326300	6237040	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	Warren Bluff					Permits		
52-3-0080	Oyster Bay;Sandringham;	AGD	56	324216	6236260	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
	Contact	Recorders	Australian Museum					Permits		
45-6-1737	Oatley Pleasure Ground;	AGD	56	322960	6237600	Closed site	Valid	Art (Pigment or Engraved) : -, Shell : -, Artefact : -	Midden,Shelter with Art	
	Contact	Recorders	Warren Bluff					Permits		
45-6-1738	Oatley Pleasure Ground;	AGD	56	322940	6239430	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	Warren Bluff					Permits		
45-6-1739	Oatley Pleasure Ground;	AGD	56	322940	6239450	Open site	Valid	Art (Pigment or Engraved) : -	Rock Engraving	
	Contact	Recorders	Warren Bluff					Permits		
45-6-1741	Oatley;	AGD	56	322700	6237000	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
	Contact	Recorders	Warren Bluff					Permits		
45-6-1742	Oatley Point;	AGD	56	322980	6237020	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	Warren Bluff					Permits		
45-6-1743	Oatley Point;	AGD	56	322980	6236990	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	Warren Bluff					Permits		
45-6-1744	Oatley Point;	AGD	56	323010	6236950	Open site	Valid	Shell : -, Artefact : -, Art (Pigment or Engraved) : -	Midden,Rock Engraving	
	Contact	Recorders	Warren Bluff					Permits		

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 32028-Nov 2025

Client Service ID : 1062779

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
45-6-1648	Bibby Street;Carlton;	AGD	56	326215	6238528	Open site	Valid	Art (Pigment or Engraved) : -	Rock Engraving	
	<u>Contact</u>	<u>Recorders</u>	ASRSYS					<u>Permits</u>		
45-6-1833	Oatly Bay,;	AGD	56	323500	6237900	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	1333
	<u>Contact</u>	<u>Recorders</u>	Warren Bluff					<u>Permits</u>		
45-6-1745	Oatley Point;	AGD	56	323000	6236960	Closed site	Valid	Burial : -, Shell : -, Artefact : -	Burial/s,Shelter with Midden	
	<u>Contact</u>	<u>Recorders</u>	Warren Bluff					<u>Permits</u>		
45-6-2671	Wolli Creek 3	AGD	56	327550	6243825	Open site	Valid	Artefact : 3		
	<u>Contact</u>	<u>Recorders</u>	Michael Guider					<u>Permits</u>		
45-6-1834	Oatley Bay,;	AGD	56	323360	6237960	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	1333
	<u>Contact</u>	<u>Recorders</u>	Warren Bluff					<u>Permits</u>		
45-6-2936	Pouton Park	GDA	56	323800	6237800	Open site	Valid	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	Michael Guider					<u>Permits</u>		
45-6-2951	Ritchie St Sans Souci (this is not a site)	GDA	56	327970	6237653	Open site	Not a Site	Shell : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Shaun Longbottom					<u>Permits</u>		
45-6-2974	Fairview Street - Arncliffe	GDA	56	327332	6242879	Open site	Valid	Artefact : 18		102314
	<u>Contact</u>	<u>Recorders</u>	Mr.Steve Brown,Mr.Paul Irish,Coast History & Heritage					<u>Permits</u>		
45-6-3132	2 Beach Street Midden Carss Pk	GDA	56	326089	6237153	Open site	Valid	Shell : -		
	<u>Contact</u> Metropolitan Local Aboriginal	<u>Recorders</u>	Ms.Miranda Fire-Star (nee Morton)					<u>Permits</u>		
45-6-3703	Lou's Healing Place	GDA	56	328068	6237633	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Paul Irish,Coast History & Heritage					<u>Permits</u>		
45-6-3697	SR-OVRH-1	GDA	56	326178	6243095	Closed site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Geordie Oakes,AECOM Australia Pty Ltd - Sydney					<u>Permits</u>		
45-6-3698	WC-OVRH-1	GDA	56	325918	6243345	Closed site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Geordie Oakes,AECOM Australia Pty Ltd - Sydney					<u>Permits</u>		
45-6-3699	WC-OVRH-2	GDA	56	326969	6244040	Closed site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Geordie Oakes,AECOM Australia Pty Ltd - Sydney					<u>Permits</u>		
45-6-3701	WC-OVRH-3	GDA	56	327472	6244023	Closed site	Valid	Potential Archaeological Deposit (PAD) : -		

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 32028-Nov 2025

Client Service ID : 1062779

<u>SiteID</u>	<u>SiteName</u>	<u>Datum</u>	<u>Zone</u>	<u>Easting</u>	<u>Northing</u>	<u>Context</u>	<u>Site Status **</u>	<u>SiteFeatures</u>	<u>SiteTypes</u>	<u>Reports</u>
	<u>Contact</u>	<u>Recorders</u>	Mr.Geordie Oakes,AECOM Australia Pty Ltd - Sydney					<u>Permits</u>		
45-6-4111	2-4 Hale PAD01	GDA	56	332770	6242382	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	Artefact Heritage and Environment - Pyrmont,Mr.Gareth Holes					<u>Permits</u>		

**** Site Status**

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

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

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

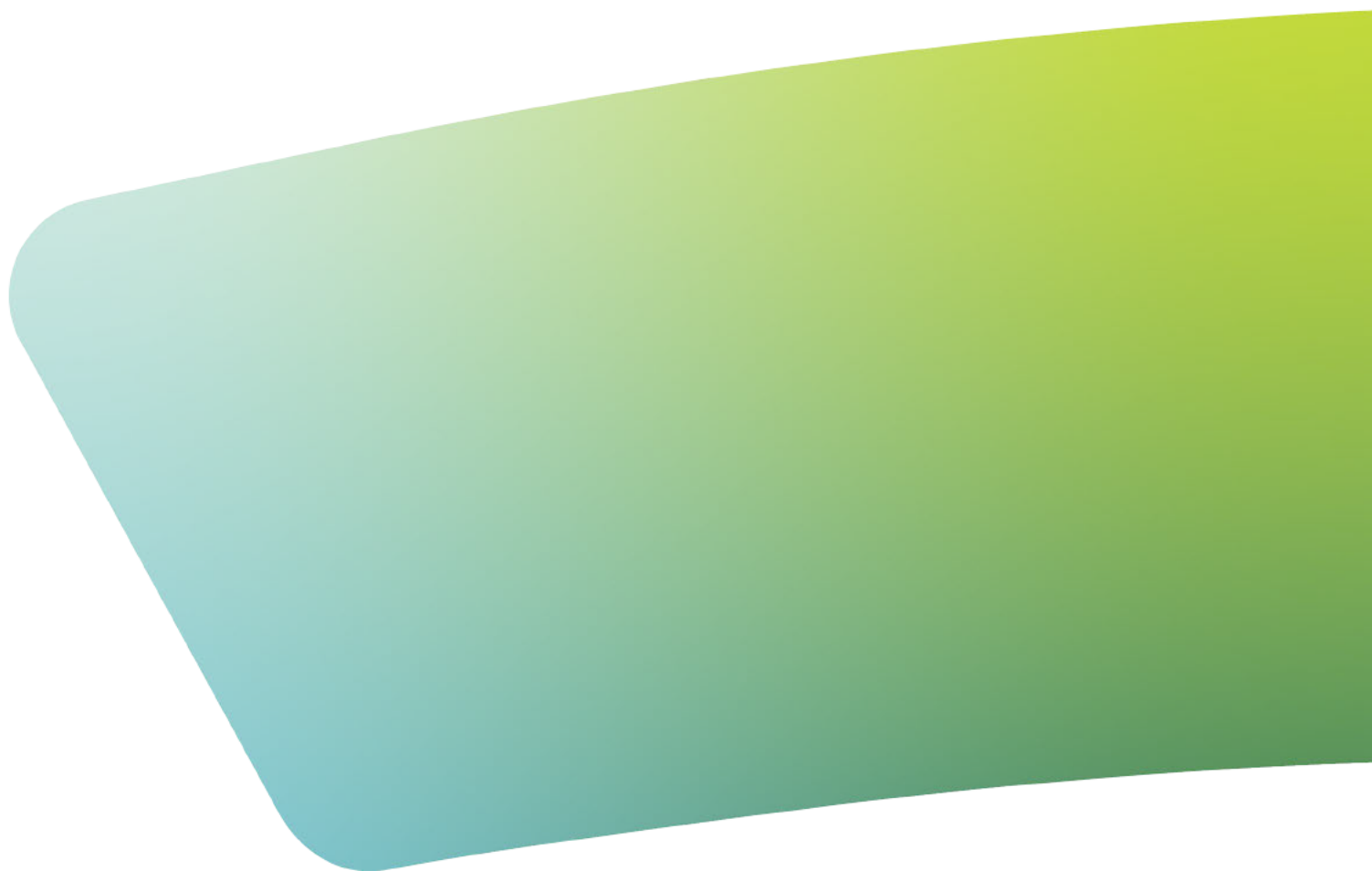
Not a site - The site has been originally entered and accepted onto AHIMS as a valid site but after further investigations it was decided it is NOT an aboriginal site. Impact of this type of site does not require permit but Heritage NSW should be notified

Report generated by AHIMS Web Service on 05/11/2025 for Brent Koppel for the following area at Lat, Long From : -34.0009, 151.0767 - Lat, Long To : -33.9297, 151.2003. Number of Aboriginal sites and Aboriginal objects found is 60

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Appendix 2

Consultation Log



Contact	Contacted By	Method	Date	Comments
Aboriginal Consultation Requirements for Proponents (DECCW 2010)*				
ABORIGINAL CONSULTATION RECORD				
Project Name: St George Private Hospital Heritage Assessments			Project #: 32028	
Stage 1 – Notification of project proposal and registration of interest (DECCW 2010 Section 4.1)				
Agency Letter Sent				
Heritage NSW	Brent Koppel (Umwelt)	Email	15/05/2025	
Metropolitan Local Aboriginal Land Council	Brent Koppel (Umwelt)	Email	15/05/2025	
La Perouse Local Aboriginal Land Council	Brent Koppel (Umwelt)	Email	15/05/2025	
The Office of the Registrar, Aboriginal Land Rights Act 1983	Brent Koppel (Umwelt)	Email	15/05/2025	
National Native Title Tribunal	Brent Koppel (Umwelt)	Email	15/05/2025	
Native Title Services NTSCORP	Brent Koppel (Umwelt)	Email	15/05/2025	
Georges River Council	Brent Koppel (Umwelt)	Email	15/05/2025	
Greater Sydney Local Land Service	Brent Koppel (Umwelt)	Email	15/05/2025	
Agency Letter Responses				
Brent Koppel (Umwelt)	Heritage NSW	Email	15/05/2025	Automated response confirming receipt of request (51091)
Brent Koppel (Umwelt)	Georges River Council	Email	15/05/2025	Automated response confirming receipt of request. Correspondence forwarded for actioning
Brent Koppel (Umwelt)	Greater Sydney Local Land Service	Email	15/05/2025	Automated response confirming receipt of request
Brent Koppel (Umwelt)	National Native Title Tribunal	Email	15/05/2025	Automated response confirming receipt of request
Brent Koppel (Umwelt)	Greater Sydney Local Land Service	Email	15/05/2025	GS LLS says they are not not a primary source of contact for First Nations (Aboriginal) communities. Suggests contacting Heritage NSW
Brent Koppel (Umwelt)	National Native Title Tribunal	Email	15/05/2025	Confirmation all Lot/DP of the Project Area are 'freehold' tenures
Brent Koppel (Umwelt)	The Office of the Registrar, Aborigina	Email	16/05/2025	Confirmation of no Registered Aboriginal Owners for Project Area. Confirmed Project Area is within MLALC boundaries
Brent Koppel (Umwelt)	Heritage NSW (Anna Preize)	Email	20/05/2025	Confirmation that request has been issued to assessments team
Brent Koppel (Umwelt)	Heritage NSW (Barry Gunther)	Email	26/05/2025	Provision of Heritage NSW stakeholder list
Newspaper Public Notice				
St George and Sutherland Shire Leader		16/07/2025		32028 - 32028_Stage 1_Public notice - All Documents
Expression of Interest Letter Sent				
Metropolitan Local Aboriginal Land Council	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
A1 Indigenous Services	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Amanda Hickey Cultural Services	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Aragung Aboriginal Cultural Heritage Site Assessments	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
B.H. Heritage Consultants	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Badu (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Barking Owl Aboriginal Corporation	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Barraby Cultural Services	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Bidjawong Aboriginal Corporation	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Bilinga (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Butucarbin Aboriginal Corporation	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Clive Freeman	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Cullendulla (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Darug Aboriginal Cultural Heritage Assessments	Brent Koppel (Umwelt)	Post	8/07/2025	Letter (RPP4463800094006552642602) invitation to register
Darug Boorooberongal Elders Aboriginal Corporation	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Darug Land Observations	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Dharug (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Dharug Ngurra Aboriginal Corporation	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Didge Ngunawal Clan	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Gandagara Local Aboriginal Land Council	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Ginninderra Aboriginal Corporation	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Goobah Development PTY LTD (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register. Email bounced as undeliverable
Goodradigbee Cultural & Heritage Aboriginal Corporation	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Gulaga	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Gunjeewong Cultural Heritage Aboriginal Corporation	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Guntawang Aboriginal Resources Incorporated	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Gunyu (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
James Davis	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Jerringong (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Kamilaroi Yankuntjatjara Working Group	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Koori Digs Services	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Minnamunung	Brent Koppel (Umwelt)	Post	8/07/2025	Letter (RPP4463800094006506446607) invitation to register. Letter returned as "unclaimed"
Munyunga (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Mura Indigenous Corporation (icn:8991)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Murramarang (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Murrumbul (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Ngambaa Cultural Connections	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Nundagurri (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Pemulwuy (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Thauaira	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Thawun Aboriginal Consultancy	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register

Thomas Dahlstrom	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Thoorga Nura	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Tocornwall	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register. Email bounced as undeliverable. Scott Franks captured through Yarrawalk
Yarrawalk Pty Ltd	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Waawaar Aaaa Aboriginal Corporation	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Wailwan Aboriginal Group	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Walgalu (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Wingikara (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Wori Woiliywa	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Wullung (Murrin Clan/Peoples)	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Wurrumay Culture Heritage Consultants	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native AI	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Yulay Cultural Services	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Yurrandaali	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Bariyan Cultural Connections	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
RAW Cultural Healing	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Long Gully Cultural Services	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Gadu chts	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Pearl Depoma	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Debbie Moon	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Darug Aboriginal Resource Centre	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Wallangang Aboriginal Corporation	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Ross Tangye	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Gadhungal Marrng	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Turtle Dreaming	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Sheryl Fulcher	Brent Koppel (Umwelt)	Email	8/07/2025	Invitation to register
Konango Aboriginal Cultural Heritage Services	Brent Koppel (Umwelt)	Phone	21/07/2025	Invitation to register
Yurwang Gundana Cultural Heritage Services	Brent Koppel (Umwelt)	Email	22/07/2025	Invitation to register

Expression of Interest Responses

Long Gully Cultural Services	Ethan Trewhynn	Email	8/07/2025	Expressed interest in registering interest. BK responded confirming registration
Yulay Cultural Services	Arika Jalomaki	Email	8/07/2025	Expressed interest in registering interest. BK responded confirming registration
Wailwan Aboriginal Group	Phillip Boney	Email	8/07/2025	Expressed interest in registering interest. BK responded confirming registration
Didge Ngunawal Clan	Lilly Carroll	Email	8/07/2025	Expressed interest in registering interest. BK responded confirming registration
Gandangara Local Aboriginal Land Council	Daliah Aggrey-Fynn	Email	8/07/2025	Expressed interest in registering interest. BK responded confirming registration
Yarrawalk Pty Ltd	Scott Franks	Email	8/07/2025	Expressed interest in registering interest. BK responded confirming registration
Thomas Dahlstrom	Thomas Dahlstrom	Email	8/07/2025	Expressed interest in registering interest. BK responded confirming registration
A1 Indigenous Services	Carolyn Hickey	Email	9/07/2025	Expressed interest in registering interest. BK responded confirming registration
Amanda Hickey Cultural Services	Amanda De Zwart	Email	20/07/2025	Expressed interest in registering interest. BK responded confirming registration
Kamilaroi Yankuntjatjara Working Group	Phil Khan	Email	21/07/2025	Expressed interest in registering interest. BK responded confirming registration
Butucarbin Aboriginal Corporation	Jennifer Beale	Email	21/07/2025	Expressed interest in registering interest. BK responded confirming registration
Konango Aboriginal Cultural Heritage Services	Robert Young	Email	21/07/2025	Expressed interest in registering interest. BK responded confirming registration. Suggested inviting Dean Bell to register
Pamela Young	Pamela Young	Email	21/07/2025	Expressed interest in registering interest via Bob Young's email (above). BK responded confirming registration

Notification Letter Sent

Heritage NSW	Brent Koppel (Umwelt)	Email	11/09/2025	Notification letter listing Project RAPs
Metropolitan Local Aboriginal Land Council	Brent Koppel (Umwelt)	Email	11/09/2025	Notification letter listing Project RAPs

Stage 2 – (Presentation of information about the proposed project) and 3 (Gathering information about cultural significance) (DECCW 2010 Section 4.2 and 4.3)

Methodology / Project Information Sent

Metropolitan LALC		Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Long Gully Cultural Services	Ethan Trewhynn	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Yulay Cultural Services	Arika Jalomaki	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Wailwan Aboriginal Group	Phillip Boney	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Didge Ngunawal Clan	Lilly Carroll	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Gandangara Local Aboriginal Land Council	Daliah Aggrey-Fynn	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Yarrawalk Pty Ltd	Scott Franks	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Thomas Dahlstrom	Thomas Dahlstrom	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
A1 Indigenous Services	Carolyn Hickey	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Amanda Hickey Cultural Services	Amanda De Zwart	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Butucarbin Aboriginal Corporation	Jennifer Beale	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Konango Aboriginal Cultural Heritage Services	Robert Young	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Pamela Young	Pamela Young	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025
Yurwang Gundana Cultural Heritage Services	Dean Bell	Email	6/08/2025	Issued draft methodology requesting comment by 3 September 2025

Methodology / Project Information Responses (due 3 September)

Long Gully Cultural Services	Ethan Trewhynn	Email	7/08/2025	Agreed with the methodology provided. Provided a range of comments regarding the management of any potential Aboriginal heritage (see here). BK replied
A1 Indigenous Services	Carolyn Hickey	Email	10/08/2025	Agreed with the methodology provided, and would like to be included in all meetings, reports, sharing of cultural information, and fieldwork. BK replied
Amanda Hickey Cultural Services	Amanda De Zwart	Email	22/08/2025	Agreed with the methodology provided. BK replied.
Thomas Dahlstrom	Thomas Dahlstrom	Email	25/08/2025	Agreed with the methodology provided. BK replied.

Eol Survey participation			
Metropolitan LALC	Brent Koppel (Umwelt)	Email	19/08/2025 Invitation to confirm availability to attend surveys on 10 September.
Long Gully Cultural Services	Brent Koppel (Umwelt)	Email	19/08/2025 Invitation to confirm availability to attend surveys on 10 September. ET confirmed availability. BK replied.
Yarrowalk Pty Ltd	Brent Koppel (Umwelt)	Email	19/08/2025 Invitation to confirm availability to attend surveys on 10 September.
A1 Indigenous Services	Brent Koppel (Umwelt)	Email	19/08/2025 Invitation to confirm availability to attend surveys on 10 September. CH confirmed availability. BK replied.
Amanda Hickey Cultural Services	Brent Koppel (Umwelt)	Email	19/08/2025 Invitation to confirm availability to attend surveys on 10 September. AH confirmed availability. BK replied.
Konanggo Aboriginal Cultural Heritage Services	Brent Koppel (Umwelt)	Email	19/08/2025 Invitation to confirm availability to attend surveys on 10 September. RY confirmed availability. BK replied

Stage 4 – Review of draft cultural heritage assessment report (DECCW 2010 Section 4.4)

Draft Report Sent			
Metropolitan LALC		Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Long Gully Cultural Services	Ethan Trewlynn	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Yulay Cultural Services	Arika Jalomaki	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Wailwan Aboriginal Group	Phillip Boney	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Didge Ngunawal Clan	Lilly Carroll	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Gandangara Local Aboriginal Land Council	Daliah Aggrey-Fynn	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Yarrowalk Pty Ltd	Scott Franks	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Thomas Dahlstrom	Thomas Dahlstrom	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
A1 Indigenous Services	Carolyn Hickey	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Amanda Hickey Cultural Services	Amanda De Zwart	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Butucarbin Aboriginal Corporation	Jennifer Beale	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Konanggo Aboriginal Cultural Heritage Services	Robert Young	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Pamela Young	Pamela Young	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Yurwang Gundana Cultural Heritage Services	Dean Bell	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025
Kamilaroi Yankuntjatjara Working Group	Phil Khan	Email	3/10/2025 Issued draft ACHArequesting comment by 31 October 2025

Draft Report Responses			
A1 Indigenous Services	Carolyn Hickey	Email	4/10/2025 Supported the methods, findings and recommendations presented within the draft ACHA.
Konanggo Aboriginal Cultural Heritage Services	Robert Young	Email	7/10/2025 Supported the methods, findings and recommendations presented within the draft ACHA. Recommended that the Connecting with Country Framework (NSW Architects, 2023) be engaged with. Also suggested that Paul Irish might offer some additional insights.

Appendix 3

Invitation to Register



From: [Brent Koppel](#)
To: [Brent Koppel](#)
Cc: [Melissa Moritz](#), [Luke Wolfe](#), jgadd@akalan.com.au
Bcc: [REDACTED]

Subject: 32028 - St George Private Hospital development - Invitation to register
Date: 05 November 2025, 18:42:54
Attachments: [32028_Stage 1_EOI_20250708.pdf](#)

Good afternoon,

Umwelt (Australia) Pty Ltd (Umwelt), on behalf of Akalan Projects Pty Ltd (Akalán), and in accordance with Section 4.1.2 of the *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010), is inviting you to register your interest in being consulted as part of the proposed development to St George Private Hospital. The Project is proposed to comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

Attached is a letter containing the relevant Project information, as well as the contact details of Project personnel.

If you would like to register your interest and participation in this Project, we ask that you respond within 14 days, by **22 July 2025**. Please also be aware if you are registering an interest, your details will be forwarded to Heritage NSW and Metropolitan Local Aboriginal Land Council in accordance with Section 4.1.6 of *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010). Please advise if you do not wish for your details to be released. If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel
Archaeologist

p. **1300 793 267**
m. **0400 124 244**
w. www.umwelt.com.au



Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky. We pay our respects to Elders past and present.

Hello,

RE: Expression of Interest – Consultation for Proposed St George Private Hospital Upgrade and Development

Umwelt Australia Pty Ltd (Umwelt) on behalf Akalan Projects Pty Ltd (Akalán), is writing to inform you of Aboriginal cultural heritage assessment associated with the proposed development to St George Private Hospital ('the Project').

The Project is located in Kogarah, within the Georges River Council Local Government Area (the Project Area). The Project will comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street. Development approval for the Project will be applied for as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Secretary's Environmental Assessment Requirements (SEARs) were issued on 30 June 2025 (SSD-86969958) and will require the completion of an Aboriginal Cultural Heritage Assessment (ACHA) to assess the potential risks to Aboriginal cultural heritage.

The purpose of community consultation with Aboriginal people is to assist Akalan in:

1. Assessing the Aboriginal heritage values of the area.
2. Complying with conditions of development applications under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).
3. To assist regulators in the assessment of Aboriginal heritage reports prepared for this Project.
4. Any future applications under the EP&A Act.

The Aboriginal Cultural Heritage Assessment will be undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010a), *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010b) and *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011).

In accordance with Section 4.1.2 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010a), Umwelt, on behalf Akalan is writing to you to determine if you wish to be consulted as part of the Aboriginal Cultural Heritage Assessment for the Project. If so, we ask that you please register your interest no later than **22 July 2025** to:

Brent Koppel
Umwelt (Australia) Pty Limited
Suite 1101, Level 11/213 Miller Street
North Sydney NSW 2060
E | bkoppel@umwelt.com.au
M | 0400 124 244

We also ask at this time, if you would like to share any cultural information that may be relevant to determining the significance of Aboriginal objects and/or places within the Project area and environs to please contact us. Please note, any cultural information provided to Umwelt will be recorded in the

consultation log and may also be discussed in the report. If the information provided to Umwelt is considered too sensitive to be made public, please advise us and identify the nature of the sensitivity and if you wish any information to be omitted from the report. All cultural knowledge provided to Umwelt will remain the intellectual property of the knowledge holder.

Please also be aware if you are registering an interest, your details will be forwarded to Heritage NSW and the Local Aboriginal Land Council (LALC) in accordance with Section 4.1.6 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010a). Please advise if you do not wish for your details to be released.

For further information on the Project and for your records, the contact details for the proponent are as follows:

Julian Gadd
Project Manager
Akalan Projects Pty Ltd
E | jgadd@akalan.com.au

If you have any questions regarding this correspondence or wish to discuss the proposed project further, please do not hesitate to contact the undersigned.

Yours sincerely,



Brent Koppel
Archaeologist
E | bkoppel@umwelt.com
M | 0400 124 244

Connect with Classifieds

Phone: 1300 618 237

classifieds.sydney@austcommunitymedia.com.au

ST GEORGE & SUTHERLAND SHIRE
Leader

Public Notices

Notice of a non-claimant application for determination of native title in New South Wales

Notification day: 30 July 2025



National Native Title Tribunal

A 'non-claimant' application has been made to the Federal Court of Australia (Federal Court) seeking a determination that native title does not exist in the area described below. The Applicant has a non-native title interest in the area, which is set out in their application and summarised below.

Under the *Native Title Act 1993* (Cth), there can be only one determination of native title for an area. Unless there is a relevant native title claim, as defined in section 24FE, over the area described below on or before **29 October 2025**, the area may be subject to protection under section 24FA and **acts may be done which extinguish or otherwise affect native title**.

A person who claims to hold native title rights and interests in this area may wish to file a native title claimant application or become a party to this non-claimant application. These may be the only opportunities to have those rights and interests taken into account in the Federal Court's determination. Any other person may also wish to become a party.

If you want to become a party to this application, you must file a Form 5 (Notice of Intention to become a Party) with the Federal Court, **on or before 29 October 2025**. Further information regarding how to file a Form 5 is available from www.fedcourt.gov.au. After **29 October 2025**, you will need to seek leave from the Federal Court to become a party.



Application name: Georges River Council

Federal Court File No: NSD891/2025

Non-native title interest: Georges River Council is the Crown Land Manager of Crown Reserve 83252 for Public Recreation for the purposes of the *Crown Land Management Act 2016* (NSW)

Order sought by Applicant: The applicant seeks protection under section 24FA of the *Native Title Act 1993* (Cth) in respect of the land described as Lots 1 and 2 on DP1311599 and Lot 543 on DP727276

Description of area: The application area covers about 7.4 hectares within the Carss Park abutting Kogarah Bay

Relevant LGA: Georges River Council

For assistance and any further information about this application, including the description of the area, call Claire Smith on 07 3052 4040 or visit www.nntt.gov.au.

Public Notices

Notice of Aboriginal Consultation: St George Private Hospital Upgrade and Development

Akalan Projects Pty Ltd (Akalan) is seeking to identify Aboriginal organisations or Aboriginal persons who hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or Aboriginal places within the Project Area for a proposed development to St George Private Hospital (the Project). The Project will comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

Aboriginal organisations or Aboriginal persons who hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or Aboriginal places in the area of the project are invited to register an interest in a process of community consultation with the proponent regarding the proposal.

The purpose of community consultation with Aboriginal people is to assist the applicant in: 1) assessing the Aboriginal heritage values of the area, 2) complying with conditions of development applications under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), 3) to assist regulators in the assessment of Aboriginal heritage reports prepared for this project, and 4) any future applications under the EP&A Act.

Interested Aboriginal persons and/or organisations are requested to register their interest via email to Brent Koppel (bkoppel@umwelt.com.au).

Please note, registrations must be submitted by **30 July 2025**. In accordance with Section 4.1.6 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*, any Aboriginal persons and/or organisations will have their details forwarded to Heritage NSW and Metropolitan LALC. Please advise if you do not want your details released.

Proponent contact: Julian Gadd
(jgadd@akalan.com.au).

Religion

Prayer to St. Jude

Patron of Hopeless and Impossible Cases.

O holy St Jude, apostle and martyr great in virtue, rich in miracle, near kinsman to Jesus Christ, faithful intercessor of all who invoked your patronage in time of need. To you, I have recourse from the depth of my heart and humbly beg great power to come to my assistance. Help me in my present and most urgent petition (say your request).

In return, I promise to make your name known and cause your name to be invoked.

St. Jude, pray for us and all who invoke your name.

Amen.

Pray this for 9 times in 9 consecutive days.
Please don't forget St. Jude when your wish is granted!
Feast day: 28 October.

Adult Services

**47 Sydenham Rd
Marrickville**

F/Service fr **\$60;**
\$75 /30min **\$130** /60min

**Top
Special Service
Shower Avail**
Open 7 Days: 9am-11pm
8068 2672

AT CRONULLA
Best B/Rub from \$50
Your Dreaming Lady
1-30 Cronulla St
☎ 0404 757 580
massagecronulla.com.au

Adult Services

AT CRONULLA
Best B/Rub from \$50
Your Dreaming Lady
1-30 Cronulla St
☎ 0404 757 580
massagecronulla.com.au

At Jannali New

Best F/body Rub, Free Hair cut. 60A Railway Crescent.
0450 688 708; 8502 8613

MAN TO MAN

Handsome Asian, full service, erotic massage. Good fun 41st/bi/curious.
In/out. 0401 751 895

PRIVATE, pretty mature European lady, enjoys natural mutual, pleasure, most request met, over 50, no exception
0450 255 945

No time to phone? SUBMIT YOUR CLASSIFIED ONLINE!
www.addirect.com.au

Appendix 4

Responses to Invitation to Register

Brent Koppel

From: Ethan Trewlynn [REDACTED]
Sent: Tuesday, 8 July 2025 3:29 PM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital development - Invitation to register

You don't often get email from ethan3trewlynn@gmail.com. [Learn why this is important](#)

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Hi Brent,

I would like to register Long Gully Cultural Services for this project.

Kind regards,

Ethan

On Tue, 8 July 2025, 3:23 pm Brent Koppel, <BKoppel@umwelt.com.au> wrote:

Good afternoon,

Umwelt (Australia) Pty Ltd (Umwelt), on behalf of Akalan Projects Pty Ltd (Akalán), and in accordance with Section 4.1.2 of the *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010), is inviting you to register your interest in being consulted as part of the proposed development to St George Private Hospital. The Project is proposed to comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

Attached is a letter containing the relevant Project information, as well as the contact details of Project personnel.

If you would like to register your interest and participation in this Project, we ask that you respond within 14 days, by **22 July 2025**. Please also be aware if you are registering an interest, your details will be forwarded to Heritage NSW and Metropolitan Local Aboriginal Land Council in accordance with Section 4.1.6 of *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010). Please advise if you do not wish for your details to be released.

If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



Brent Koppel

From: Arika J [REDACTED]
Sent: Tuesday, 8 July 2025 3:30 PM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital development - Invitation to register

You don't often get email from yulayculturalservices@gmail.com. [Learn why this is important](#)

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Good evening Brent,

Yulay cultural service's would like to register our interest and be involved in all aspects of this project.

Kind regards,

Arika Jalomaki
[REDACTED]

On Tue, 8 Jul 2025 at 3:23 pm, Brent Koppel <BKoppel@umwelt.com.au> wrote:

Good afternoon,

Umwelt (Australia) Pty Ltd (Umwelt), on behalf of Akalan Projects Pty Ltd (Akalán), and in accordance with Section 4.1.2 of the *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010), is inviting you to register your interest in being consulted as part of the proposed development to St George Private Hospital. The Project is proposed to comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

Attached is a letter containing the relevant Project information, as well as the contact details of Project personnel.

If you would like to register your interest and participation in this Project, we ask that you respond within 14 days, by **22 July 2025**. Please also be aware if you are registering an interest, your details will be forwarded to Heritage NSW and Metropolitan Local Aboriginal Land Council in accordance with Section 4.1.6 of *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010). Please advise if you do not wish for your details to be released.

If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



Brent Koppel

From: Phillip Boney [REDACTED]
Sent: Tuesday, 8 July 2025 3:30 PM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital development - Invitation to register

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Hey Brent thank you for your email I would like to register my interest regarding this project in all of the stages and I look forward for more information thank you

Regards

Phil Boney

Wailwan Aboriginal Group 🏡🏡

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From: Brent Koppel <BKoppel@umwelt.com.au>
Sent: Tuesday, July 8, 2025 3:23:49 PM
To: Brent Koppel <BKoppel@umwelt.com.au>
Cc: Melissa Moritz <mmoritz@umwelt.com.au>; Luke Wolfe <lwolfe@umwelt.com.au>; jgadd@akalan.com.au <jgadd@akalan.com.au>
Subject: 32028 - St George Private Hospital development - Invitation to register

Good afternoon,

Umwelt (Australia) Pty Ltd (Umwelt), on behalf of Akalan Projects Pty Ltd (Akalán), and in accordance with Section 4.1.2 of the *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010), is inviting you to register your interest in being consulted as part of the proposed development to St George Private Hospital. The Project is proposed to comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

Attached is a letter containing the relevant Project information, as well as the contact details of Project personnel.

If you would like to register your interest and participation in this Project, we ask that you respond within 14 days, by **22 July 2025**. Please also be aware if you are registering an interest, your details will be forwarded to Heritage NSW and Metropolitan Local Aboriginal Land Council in accordance with Section 4.1.6 of *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010). Please advise if you do not wish for your details to be released.

If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel
Archaeologist

m. 0400 124 244
w. www.umwelt.com.au



By clicking on this icon, you agree to the terms and conditions of the service. For more information, please visit our website.

Brent Koppel

From: lilly carroll [REDACTED]
Sent: Tuesday, 8 July 2025 3:36 PM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital development - Invitation to register

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Hi Brent

DNC would like to register an interest into St George Hospital redevelopment project

Kind regards
Paul boyd and Lilly Carroll
[REDACTED]

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, July 8, 2025, 3:23 pm, Brent Koppel <BKoppel@umwelt.com.au> wrote:

Good afternoon,

Umwelt (Australia) Pty Ltd (Umwelt), on behalf of Akalan Projects Pty Ltd (Akalán), and in accordance with Section 4.1.2 of the *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010), is inviting you to register your interest in being consulted as part of the proposed development to St George Private Hospital. The Project is proposed to comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

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If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



Brent Koppel

From: GLALC [REDACTED]
Sent: Tuesday, 8 July 2025 5:32 PM
To: Brent Koppel
Cc: Melissa Williams; Mark Spithill; GLALC Culture&Heritage
Subject: RE: 32028 - St George Private Hospital development - Invitation to register

You don't often get email from culture&heritage@glalc.org.au. [Learn why this is important](#)

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Dear Brent,

Thank you for your correspondence regarding the proposed expansion of St George Private Hospital.

At this stage, Gandangara Local Aboriginal Land Council does not have any specific individuals or groups to recommend for consultation. However, we would like to register Gandangara LALC as an interested party in this project.

Please do not hesitate to contact us should you require any further information.

Kind regards,



Daliah Aggrey-Fynn

Senior Project Support Officer

[REDACTED]
[REDACTED]
[org.au](#)

Gandangara Local Aboriginal Land Council acknowledges the Families of the Cabrogal Clan as the Traditional Custodians of the lands we span. GLALC pays respects to Elders past, present and emerging. Gandangara Local Aboriginal Land Council continues to value the generations of knowledge Aboriginal people embed within our organisation.

This email message and any attached files is confidential and intended solely for the use of the individual or entity to whom it is addressed and may contain information that is privileged, confidential and/or exempt from disclosure under applicable law. If you have received this email in error, delete all copies and notify the sender.

From: Brent Koppel <BKoppel@umwelt.com.au>

Sent: Tuesday, July 8, 2025 3:23:49 PM

To: Brent Koppel <BKoppel@umwelt.com.au>

Cc: Melissa Moritz <mmoritz@umwelt.com.au>; Luke Wolfe <lwolfe@umwelt.com.au>; jgadd@akalan.com.au
<jgadd@akalan.com.au>

Subject: 32028 - St George Private Hospital development - Invitation to register

You don't often get email from bkoppel@umwelt.com.au. [Learn why this is important](#)

Good afternoon,

Umwelt (Australia) Pty Ltd (Umwelt), on behalf of Akalan Projects Pty Ltd (Akalán), and in accordance with Section 4.1.2 of the *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010), is inviting you to register your interest in being consulted as part of the proposed development to St George Private Hospital. The Project is proposed to comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

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If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



Brent Koppel

From: Scott Franks [REDACTED]
Sent: Tuesday, 8 July 2025 6:40 PM
To: Brent Koppel
Cc: Melissa Moritz; Luke Wolfe; jgadd@akalan.com.au
Subject: Re: 32028 - St George Private Hospital development - Invitation to register

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Brent,

Could you please register my interest in this project

Regards
Scott Franks
CEO

[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]



The information contained in this e-mail message and any attached files may be confidential and may contain copyright material of Yarrawalk Pty Ltd or third parties. Any unauthorised use, disclosure or copying of this e-mail and/or its attachments is prohibited. If you have received this e-mail in error, please notify the sender immediately by return e-mail and delete all copies of the message and attachments. Before opening or using attachments, please check them for viruses or defects. Our liability is limited to resupplying the e-mail and attached files. Content and views expressed in this e-mail may be those of the sender and are not necessarily endorsed by Kawal Pictures.

From: Brent Koppel <BKoppel@umwelt.com.au>
Date: Tuesday, 8 July 2025 at 3:24 pm
To: Brent Koppel <BKoppel@umwelt.com.au>
Cc: Melissa Moritz <mmoritz@umwelt.com.au>, Luke Wolfe <lwolfe@umwelt.com.au>,

jgadd@akalan.com.au <jgadd@akalan.com.au>

Subject: 32028 - St George Private Hospital development - Invitation to register

Good afternoon,

Umwelt (Australia) Pty Ltd (Umwelt), on behalf of Akalan Projects Pty Ltd (Akalán), and in accordance with Section 4.1.2 of the *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010), is inviting you to register your interest in being consulted as part of the proposed development to St George Private Hospital. The Project is proposed to comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

Attached is a letter containing the relevant Project information, as well as the contact details of Project personnel.

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If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



Brent Koppel

From: Thomas Dahlstrom [REDACTED]
Sent: Tuesday, 8 July 2025 9:32 PM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital development - Invitation to register

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Good evening

Thank you for your email.

I would like to register and be consulted as per the NSW Heritage guidelines.

Kind regards

Thomas D

On 8 Jul 2025, at 3:23 pm, Brent Koppel <BKoppel@umwelt.com.au> wrote:

Good afternoon,
Umwelt (Australia) Pty Ltd (Umwelt), on behalf of Akalan Projects Pty Ltd (Akalán), and in accordance with Section 4.1.2 of the *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010), is inviting you to register your interest in being consulted as part of the proposed development to St George Private Hospital. The Project is proposed to comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

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If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel
Archaeologist

p. 1300 793 267
m. 0400 124 244
w. www.umwelt.com.au



The image is a placeholder for a document that cannot be displayed. The image is a placeholder for a document that cannot be displayed.

<32028_Stage 1_EOI_20250708.pdf>

Brent Koppel

From: Carolyn .H [REDACTED]
Sent: Wednesday, 9 July 2025 10:29 AM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital development - Invitation to register
Attachments: A1.PL.2026.pdf; A1.WC.2026.pdf

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Good Morning Brent,

Thank you for reaching out regarding the proposed development at St George Private Hospital. I'm excited to express my interest in being involved in this project, and I would love to participate in any upcoming fieldwork opportunities.

Thank you again, and I hope to hear from you soon.
Insurances are attached

Best regards,
Carolyn Hickey

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From: Brent Koppel <BKoppel@umwelt.com.au>
Sent: Tuesday, July 8, 2025 3:24:23 pm
To: Brent Koppel <BKoppel@umwelt.com.au>
Cc: Melissa Moritz <mmoritz@umwelt.com.au>; Luke Wolfe <lwolfe@umwelt.com.au>; jgadd@akalan.com.au <jgadd@akalan.com.au>
Subject: 32028 - St George Private Hospital development - Invitation to register

Good afternoon,
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If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Brent Koppel

From: Amanda De Zwart [REDACTED]
Sent: Sunday, 20 July 2025 7:59 PM
To: Brent Koppel
Cc: Melissa Moritz; Luke Wolfe; jgadd@akalan.com.au
Subject: Re: 32028 - St George Private Hospital development - Invitation to register

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Hi Brent,

Thank you for your email. I apologize for the delayed response; my emails have been going to the junk mail folder. AHCS would like to formally register our interest in this project. AHCS holds significant cultural knowledge vital for determining Aboriginal heritage from country and has been working in cultural and heritage fields for 25 years. Attached is my current insurance. If you need anything else, please don't hesitate to contact me.

Have a great day!

Amanda Hickey
AHCS

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From: Brent Koppel <BKoppel@umwelt.com.au>
Sent: Tuesday, July 8, 2025 3:23:49 PM
To: Brent Koppel <BKoppel@umwelt.com.au>
Cc: Melissa Moritz <mmoritz@umwelt.com.au>; Luke Wolfe <lwolfe@umwelt.com.au>; jgadd@akalan.com.au <jgadd@akalan.com.au>
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If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Brent Koppel

From: Butucarbin Heritage [REDACTED]
Sent: Monday, 21 July 2025 12:11 AM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital development - Invitation to register

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Good evening,

On behalf of Butucarbin, I would like to register for this project.

Kind regards,
Jenny

On Tue, Jul 8, 2025 at 3:23 PM Brent Koppel <BKoppel@umwelt.com.au> wrote:

Good afternoon,

Umwelt (Australia) Pty Ltd (Umwelt), on behalf of Akalan Projects Pty Ltd (Akalán), and in accordance with Section 4.1.2 of the *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010), is inviting you to register your interest in being consulted as part of the proposed development to St George Private Hospital. The Project is proposed to comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

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If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



--

Lowanna Gibson
Project Manager for Butucarbin Cultural Heritage
B.A Archaeology/Anthropology USYD
Juris Doctor UTS

Brent Koppel

From: Phil Khan [REDACTED]
To: [REDACTED] 21 July 2025 4:29 PM
Subject: Brent Koppel
Attachments: Re: 32028 - St George Private Hospital development - Invitation to register
Outlook-ytqomvpg; Public liability 2025.pdf; 2025 Icare.pdf

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*
Hi Brent,

Thank you for informing us that **Umwelt** will be involved in an Aboriginal Cultural Heritage Assessment at **St George Private Hospital Development** & that you are inviting Aboriginal organisations to register, if they wish too be involved in the community consultation process.

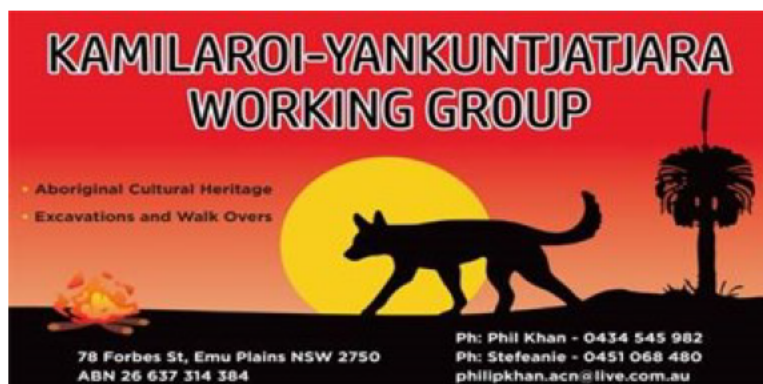
As a senior Aboriginal person for the past 51yrs, I actively participate in the protection of the Aboriginal Cultural Heritage throughout the Sydney Basin, & particularly throughout Western Sydney, on behalf of Kamilaroi-Yankuntjatjara Working Group I wish to provide to you my organisation's registration of interest.

I wish to be involved & participate in all levels of consultation/project involvement. I wish to attend all meetings, participate in available field work & receive a copy of the report.

I have attached a copy of Kamilaroi-Yankuntjatjara Working group's Public Liability Insurance & Workers Compensation certificate.

Our RAPS have up to 16yrs Cultural Heritage experience in - field work which involves manual excavation (digging), sieving, identifying artefacts, setting up transits, setting up equipment, packing equipment, site surveys & attending meetings (Focus groups, Connecting with Country, interpretation).

Kinds Regards
Phil Khan – Director
[REDACTED]



From: Brent Koppel <BKoppel@umwelt.com.au>

Sent: Tuesday, 8 July 2025 3:23 PM

To: Brent Koppel <BKoppel@umwelt.com.au>

Cc: Melissa Moritz <mmoritz@umwelt.com.au>; Luke Wolfe <lwolfe@umwelt.com.au>; jgadd@akalan.com.au <jgadd@akalan.com.au>

Subject: 32028 - St George Private Hospital development - Invitation to register

Good afternoon,

Umwelt (Australia) Pty Ltd (Umwelt), on behalf of Akalan Projects Pty Ltd (Akalán), and in accordance with Section 4.1.2 of the *Aboriginal Heritage Consultation Requirements for Proponents* (DECCW, 2010), is inviting you to register your interest in being consulted as part of the proposed development to St George Private Hospital. The Project is proposed to comprise the expansion to the existing facilities at St George Private Hospital, and the construction of a new Clinical Tower between South and Hogben Street, Kogarah, NSW.

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If you have any questions, please feel free to contact me via email or phone on 0400 124 244.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



Brent Koppel

From: Robert Young [REDACTED]
Sent: Monday, 21 July 2025 8:36 PM
To: Brent Koppel
Cc: Luke Wolfe; Pamela Young
Subject: Re: 32028 - St George Private Hospital development - Invitation to register for consultation

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Good Evening Brent,

Thanks for the deadly yarn today.

It was great to hear your voice again; it feels like it's been ages. I'm thrilled to confirm that KACHS would be privileged to register for the St George Private Hospital development. As I mentioned, this hospital holds significant meaning for my family and me, and we would be honoured to culturally support this project. Your efforts are much appreciated.

Additionally, Aunty Pam has her ABN ready as requested and would also love to register for consultation and have ccd in this email.

I spoke to Dean Bell today, and he is excited to receive an email invitation to register as well.
Dean Bell

[REDACTED]

Thanks again, and I look forward to chatting with you soon as the project progresses.

Yours In Culture,

Robert Young

Konanggo Aboriginal Cultural Heritage Services

[REDACTED]

From: Brent Koppel <BKoppel@umwelt.com.au>
Sent: Monday, July 21, 2025 7:21:56 PM
To: Robert Young <konanggo_consultancy@hotmail.com>
Cc: Luke Wolfe <lwolfe@umwelt.com.au>
Subject: 32028 - St George Private Hospital development - Invitation to register for consultation

Good evening Bob,

Thanks again for the call this afternoon. It's always great to have a chat with you! As promised, here is the invitation to register for consultation for the proposed development of St George Private Hospital. Don't worry about the due date for registration, I've already got you on the list.

Can you please send me the contact details for Dean Bell so I can see if he's keen to register as well.

Give me a shout if there is anything else I can help out with. Otherwise, we'll be talking soon as the project progresses. Hope the excavations out at Penrith are treating you well!

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



Appendix 5

Notification of RAP Registration



Brent Koppel

From: Brent Koppel
Sent: Thursday, 11 September 2025 3:12 PM
To: Office Admin MLALC; Cultural Heritage; Cultural Heritage 2
Cc: Melissa Moritz; Luke Wolfe
Subject: 32028 - Notification of Registered Aboriginal Parties - St George Private Hospital Upgrade and Development
Attachments: 32028_St George Private Hospital_Stage 1_Notice of Aboriginal Party Registration.pdf

Good afternoon,

In accordance with Section 4.1.6 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*, please see attached letter for your records.

Cheers,

Brent

Brent Koppel
Archaeologist

p. 1300 793 267
m. 0400 124 244
w. www.umwelt.com.au



Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky. We pay our respects to Elders past and present.

Brent Koppel

From: Brent Koppel
Sent: Thursday, 11 September 2025 3:11 PM
To: heritagemailbox@environment.nsw.gov.au
Cc: Melissa Moritz; Luke Wolfe
Subject: 32028 - Notification of Registered Aboriginal Parties - St George Private Hospital Upgrade and Development
Attachments: 32028_St George Private Hospital_Stage 1_Notice of Aboriginal Party Registration.pdf

Good afternoon,

In accordance with Section 4.1.6 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*, please see attached letter for your records.

Cheers,

Brent

Brent Koppel
Archaeologist

p. 1300 793 267
m. 0400 124 244
w. www.umwelt.com.au



Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky. We pay our respects to Elders past and present.

11 September 2025

To whom it may concern,

RE: Notification of Registered Aboriginal Parties – St George Private Hospital Upgrade and Development

In accordance with Section 4.1.6 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*, Umwelt (Australia Pty Ltd (Umwelt) on behalf Akalan Projects Pty Ltd (Akalán) is writing to provide you with the finalised list of registered Aboriginal parties (RAPs) for the St George Private Hospital Upgrade and Development, Kogarah, NSW ('the Project'). The following organisations and/or individuals have now confirmed their interest in being consulted for the Project:

Organisation/Individual	Organisation/Individual
Metropolitan Local Aboriginal Land Council	Thomas Dahlstrom
Long Gully Cultural Services	A1 Indigenous Services
Yulay Cultural Services	Amanda Hickey Cultural Services
Wailwan Aboriginal Group	Butucarbin Aboriginal Corporation
Didge Ngunawal Clan	Konanggo Aboriginal Cultural Heritage Services
Gandangara Local Aboriginal Land Council	Pamela Young
Yarrawalk Pty Ltd	Yurwang Gundana Cultural Heritage Services
Kamilaroi-Yankuntjatjara Working Group	

If you have any questions regarding this correspondence, or wish to discuss the proposed Project further, please do not hesitate to contact the undersigned.

Yours sincerely,



Brent Koppel
Archaeologist

E bkoppel@umwelt.com.au
M 0400 124 244

Appendix 6

Survey Methodology

Brent Koppel

From: Brent Koppel
Sent: Wednesday, 6 August 2025 3:00 PM
To: Brent Koppel
Subject: 32028 - St George Private Hospital ACHA - Draft methodology
Attachments: 32028_R01_St George Hospital ACHA draft methodology_V1.pdf

Good afternoon,

Thank you for your continuing interest in this Project. Umwelt, on behalf of Akalan, and in accordance with Sections 4.3.1 and 4.3.2 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010), invites you to review and provide comment on the draft Aboriginal Cultural Heritage Assessment methodology for the proposed development at St George Private Hospital, located at Kogarah, NSW.

A brief review of existing environmental and archaeological data for the Project Area is also provided to give context for the proposed assessment methodology. In addition to providing our draft methodology, Umwelt would also like to take this opportunity to request from you any initial comments regarding the cultural values of the Project Area. Umwelt acknowledges that cultural values may incorporate a wide range of values such as stories, traditions, and cultural practices, and we welcome advice from the Aboriginal community about tangible and intangible cultural values relevant to the Project Area and its surrounds. Umwelt is available to discuss any information are willing to share and will respect confidentiality where requested.

We would appreciate any information regarding the following:

1. Are there any other knowledge-holders or Aboriginal stakeholder groups we should be contacting to obtain cultural information on the Project Area?
2. Are there any protocols in relation to community interaction and/or cultural heritage that you would like adopted during the Project?
3. Are you aware of any Aboriginal objects, places, sites, or stories of cultural significance and/or importance that you are aware of within the Project Area and/or local environs? If so, please provide guidance on the most culturally appropriate ways in which these Aboriginal objects and/or places can be managed during the assessment process.
4. Is the information you are providing culturally-sensitive, gender specific, etc? If so, how would you like the information you provide to Umwelt to be managed? Noting that some documentation for the Aboriginal Cultural Heritage Assessment process may be required.
5. Do you require any further information prior to Umwelt proceeding with the Aboriginal Cultural Heritage Assessment?

In your response, can you please also clearly identify who you would like Umwelt to talk to within your organisation, and provide contact details for these individuals. Please also ensure your preferred method of communication (e.g., telephone call, e-mail, letter, etc) is highlighted for subsequent stages of the Project.

Please provide feedback or comments on the draft assessment methodology by **Wednesday 3 September 2025**.

If you have any questions, please contact me using the details provided below.

Cheers,

Brent

Brent Koppel

Archaeologist

p. 1300 793 267

m. 0400 124 244

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Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky. We pay our respects to Elders past and present.



St George Private Hospital Development

Aboriginal Cultural Heritage Assessment Methodology

DRAFT

August 2025



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Aboriginal Cultural Heritage Assessment
Methodology

DRAFT

Prepared by
Umwelt (Australia) Pty Limited

On behalf of
Akalan Projects Pty Ltd

Project Director: Luke Wolfe
Project Manager: Melissa Mortiz
Technical Manager: Brent Koppel
Report No.: R01
Date: August 2025



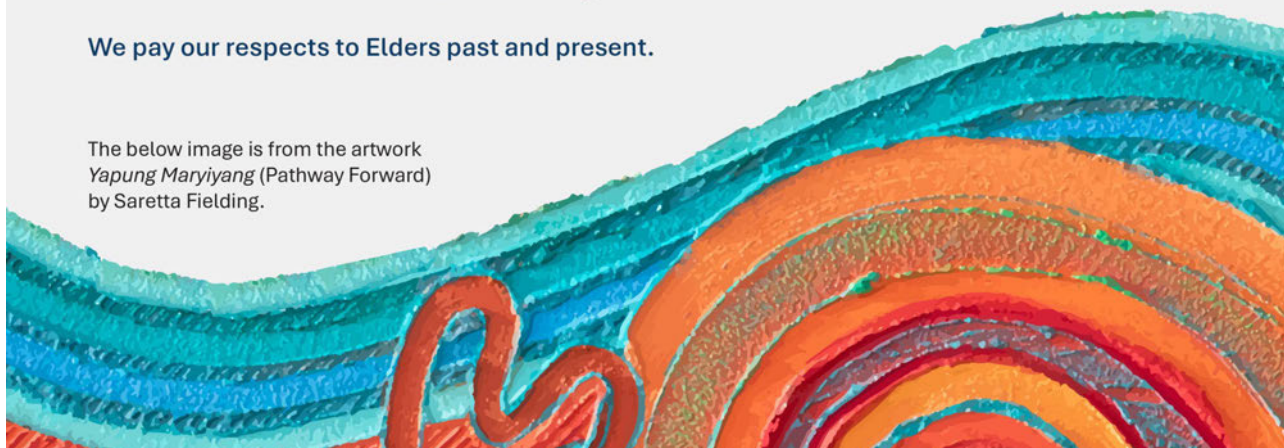
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The below image is from the artwork *Yapung Maryiyang* (Pathway Forward) by Saretta Fielding.



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Document Status

Rev No.	Reviewer Name	Date	Approved for Issue Name	Date
V1	Luke Wolfe	1/08/2025	Luke Wolfe	1/08/2025

Abbreviations

Abbreviation	Definition
ACHA	Aboriginal Cultural Heritage Assessment
AHIMS	Aboriginal Heritage Information System
Akalan	Akalan Projects Pty Ltd
BP	Before present
CBD	Central Business District
Code of Practice	<i>Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales</i>
Consultation Requirements	<i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i>
DP	Deposited Plan
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
IBRA	Interim Biogeographic Regionalisation for Australia
LEP	Local Environmental Plan
LGA	Local Government Area
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NSW	New South Wales
PAD	Potential archaeological deposit
Planning Systems SEPP	<i>State Environmental Planning Policy (Planning Systems) 2021</i>
Ramsay Health Care	Ramsay Health Care Pty Ltd
RAPs	Registered Aboriginal Parties
SEARs	Secretary's Environmental Assessment Requirements
SEPP	State Environmental Planning Policy
Umwelt	Umwelt (Australia) Pty Ltd

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1.0 Introduction

Umwelt (Australia) Pty Ltd (Umwelt) was engaged by Akalan Projects Pty Ltd (Akan) on behalf of Ramsay Health Care Pty Ltd (Ramsay Health Care) to prepare an Aboriginal Cultural Heritage Assessment (ACHA) relating to the upgrading of existing facilities at St George Private Hospital, as well as the construction of a new Clinical Tower on Hogben Street, Kogarah, New South Wales (NSW) ('the Project'). Development approval for the Project will be sought as a State Significant Development (SSD), and will require development consent under *State Environmental Planning Policy (Planning Systems) 2021* (Planning Systems SEPP) and Part 4 of the *NSW Environmental Planning and Assessment Act 1979* (EP&A Act), meaning that the need for approvals under the *National Parks and Wildlife Act 1974* (NPW Act) are not applicable (i.e., Section 90A).

Industry-specific Secretary's Environmental Assessment Requirements (SEARs) were issued on 30 June 2025 (SSD-86969958) and stipulated an ACHA be prepared as part of the Project's Environmental Impact Statement (EIS).

This draft assessment methodology details Umwelt's proposed approach to the ACHA and is being provided to all Registered Aboriginal Parties (RAPs) in accordance with Sections 4.3.1 and 4.3.2 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010a) (Consultation Requirements). This assessment methodology is intended to provide Aboriginal and other Project stakeholders with an understanding of the proposed future steps in the assessment process and framework for providing input. A brief review of existing environmental and archaeological data for the Project Area is also provided to give context to Umwelt's proposed assessment methodology.

1.1 Project Area

The Project is located approximately 12 km south of the Sydney Central Business District (CBD), approximately 4 km to the southwest of Sydney Airport (**Figure 1.1**). The Project Area is situated within the Georges River Council Local Government Area (LGA) administered by provisions within the Georges River Local Environmental Plan (LEP) (2021). The Project Area encompasses approximately 16,100 m², and comprises the curtilages and zoning as detailed in **Table 1.1**.

Table 1.1 Project Area curtilages and zoning

Lot	Deposited Plan (DP)	Zoning
31	1147692	SP2 Hospital
7	1749	RE1 Public Recreation
8	1749	RE1 Public Recreation
9	1749	RE1 Public Recreation
10	1749	RE1 Public Recreation
CP	SP101719	SP2 Hospital
1	8864	SP2 Hospital
2	8864	SP2 Hospital
3	8864	SP2 Hospital
4	8864	SP2 Hospital
5	8864	MU1 Mixed Use
A	358876	SP2 Hospital
B	358876	SP2 Hospital
C	358876	SP2 Hospital

1.2 Project Description

The Project proposes the expansion of the existing facilities at St George Private Hospital (**Figure 1.2**). Included in the expansion is the creation of an emergency department and additional operating theatre facilities. Also proposed is the construction of a new 15-floor Clinical Tower positioned opposite St George Private Hospital between South Street and Hogben Street, which will connect with the main hospital campus through a link bridge.

1.3 Assessment Objectives

The overarching objectives of the Aboriginal Cultural Heritage Assessment are as follows:

- To identify the Aboriginal cultural heritage values of the Project Area by way of background research, archaeological survey (test excavation, if required) and consultation with Aboriginal stakeholders;
- To assess the potential impact of the Project on the identified Aboriginal cultural heritage values of the Project Area, by way of Aboriginal community consultation;
- To provide an appropriate management strategy to avoid or minimise potential harm to Aboriginal cultural values identified within the Project Area; and
- To compile an Aboriginal Cultural Heritage Assessment report that will assist in development consent for the Project.

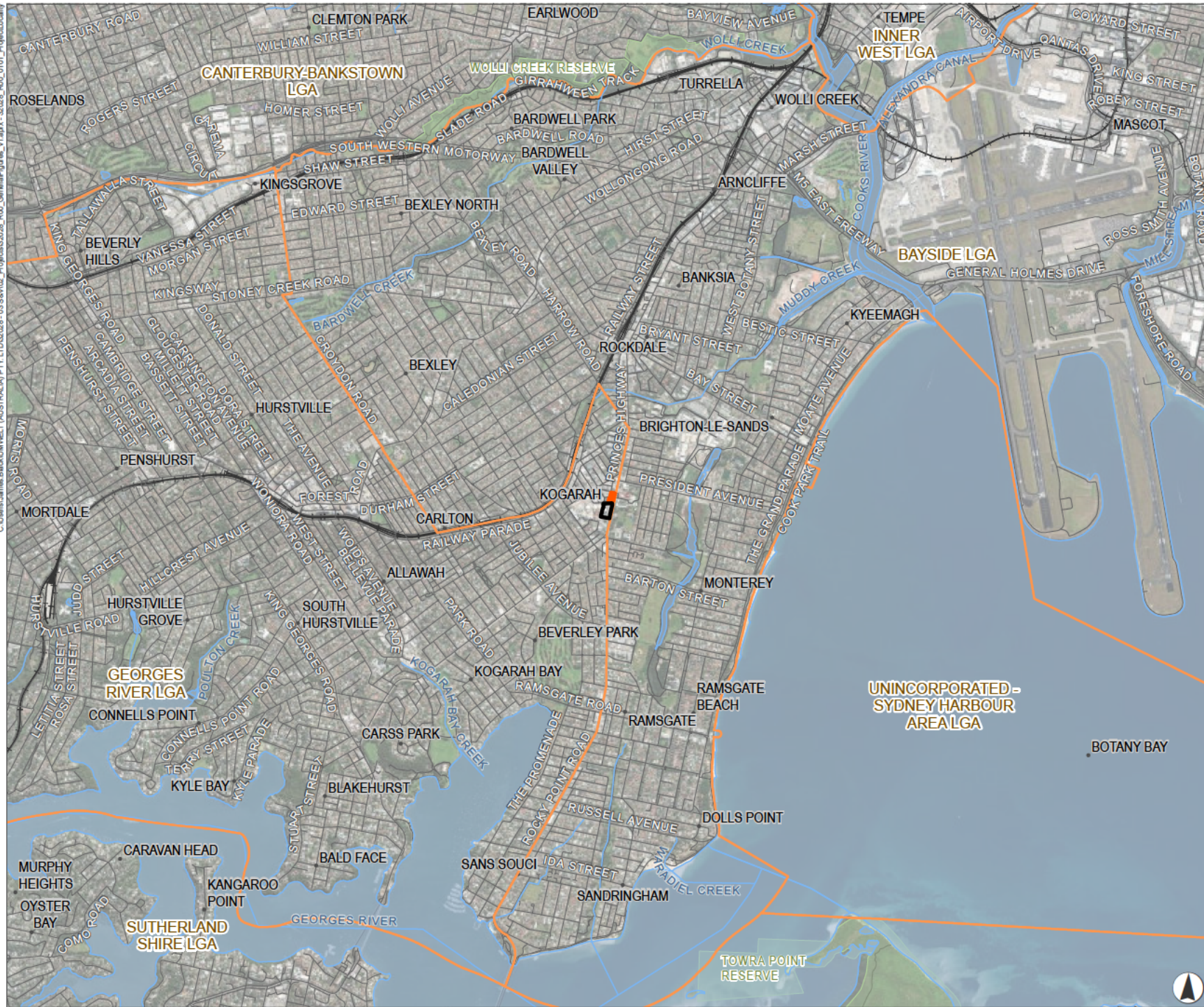
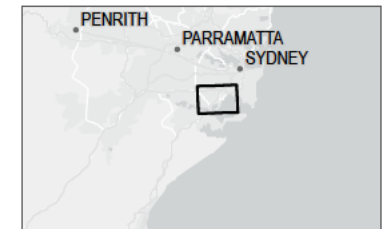


FIGURE 1.1
Project Locality

Legend

-  New Clinical Tower (Hogben St)
-  St George Private Hospital
-  Local Government Area
-  NPWS Reserve
-  Road
-  Railway
-  Watercourse
-  Waterbody



Kilometres
Scale 1:50,000 at A4
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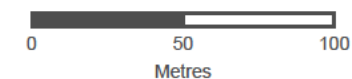
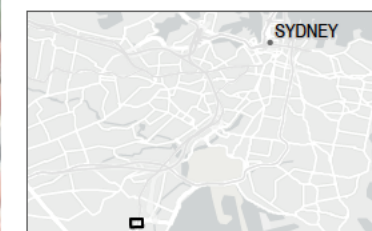
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FIGURE 1.2
Project Area

Legend

-  New Clinical Tower (Hogben St)
-  St George Private Hospital
-  Local Government Area
-  Road



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2.0 Background Information

2.1 Environmental Context

The Project Area falls within the Sydney Basin Bioregion and Pittwater sub-region, following the Interim Biogeographic Regionalisation for Australia (IBRA) classification. The Sydney Basin Bioregion encompasses catchments of the Hawkesbury, Nepean, Hunter, and Shoalhaven rivers, including the smaller catchments of Lake Macquarie, Lake Illawarra, Hacking, Georges, and Parramatta Rivers (National Parks and Wildlife Service [NPWS], 2003).

2.1.1 Topography

The topography of the Project Area and its environs is predominantly flat, with a gentle rise in elevation trending north-eastwards. The Project Area is situated approximately 1.6 km to the west of Botany Bay and sea level. The Project Area and surrounding environs is an entirely built environment so only broad topographical patterns can be interpreted as natural.

2.1.2 Hydrology

Muddy Creek flows approximately 1.1 km to the northeast of the Project Area, into Cooks River, and then into the northwest corner of Botany Bay 3.7 km to the northeast of the Project Area. Salt Pan Creek flows into Georges River approximately 8.5 km west of the Project Area, and then into Botany Bay 4.2 km to the south of the Project Area.

The Project Area and its surrounds represent a nearly entirely developed landscape featuring commercial and medium- and high-density residential infrastructure. As such, hydrological regimes would have been modified during the process of industrial developments and landscape modification. The route of extant waterways such as Georges and Cooks Rivers remain largely unmodified, however lower order streams and channels would have been replaced by artificial drainage and sewerage networks and canals. Barring the outermost extremity of Cape Banks and the southern shoreline of Botany Bay, the coastline along Botany Bay appears completely modified from a natural state.

2.1.3 Geology and Soils

Regionally, the geology of the Pittwater subregion within the Sydney Basin Bioregion is characterised by Triassic-aged Hawkesbury Sandstone capped by thin Ashfield Shales along ridgelines, and underlain by Narrabeen sandstones exposed in deeper valleys and gullies (NPWS, 2003: 193 (Haworth, 2003: 43). Locally, mapped geologies (Raymond *et al.*, 2012) of the Project Area and surrounding environs identify medium- to coarse-grained quartz sandstone with minor shale and laminate lenses typical of the Hawkesbury Sandstone. Surrounding this are rock units of the Wianamatta Group characterised by sedimentary units including sandstone, siltstone, and shale. Quaternary quartz sands are ubiquitous along natural coastlines.

Soils of the Pittwater subregion are characterised by deep yellow earths at higher elevations, contrast texture soils on slopes, and loamy sands in alluvium along waterways (NPWS, 2003: 193). Quartz sands with varying degrees of shell content characterise coastlines (NPWS, 2003). Within the broader

region of the Project Area and its surrounding environs, acid peats, sandy lithosols, and yellow and sand podzolic soils are also recorded (Corbett, 1972; Maggs *et al.*, 1977; Haworth, 2003).

Mapped soil landscapes identify the Project Area being situated on the aeolian Lucas Heights soil landscape (lh), characterised by gently undulating crests and ridges on plateau surfaces of the Mittagong formation comprising alternating beds of shale and fine-grained sandstone (Chapman *et al.*, 2009).

2.2 Database Searches

2.2.1 Native Title

A search of the spatial data on the Native Title Tribunal's Native Title Vision website on 29 April 2025 identified that the Project Area and environs are not currently subject to any registered Native Title claims.

2.2.2 Aboriginal Heritage Information Management System (AHIMS)

The Aboriginal Heritage Information System (AHIMS) database, administered by Heritage NSW, contains records of all Aboriginal objects reported to Heritage NSW in accordance with Section 89A of the NPW Act. It also contains information about Aboriginal places, which have been declared to have Aboriginal cultural significance. Recorded Aboriginal objects and declared Aboriginal places are defined under the NPW Act as 'Aboriginal sites'.

A search of the AHIMS register was undertaken on 24 April 2025 covering an approximate 4 km buffer centred on the Project Area (i.e., the 'AHIMS search area'; AHIMS search #998117) identified 60 Aboriginal sites. Of these, one (1) Aboriginal site status was listed as 'Not a Site', with the remaining 59 listed as 'Valid' (**Figure 2.1**). Bibby Street;Carlton (AHIMS ID #45-6-1648) was recorded approximately 1.9 km to the southwest of the Project Area, recorded as an art site comprising engraved motifs into rock, and is the only Aboriginal site within 2 km of the Project Area. A culturally modified tree was recorded approximately 2.3 km to the southeast of the Project Area (Lou's Healing Place, AHIMS ID #45-6-3703). A summary of Aboriginal site types within the AHIMS search area is presented in **Table 2.1** below. A cluster of five (5) Aboriginal sites was recorded approximately 2.9 km to the south of the Project Area on a headland on Kogarah Bay comprising middens, open artefact sites, and a shelter.

Table 2.1 AHIMS search results

Site Type	Count (n)	Percentage
Midden	18	30.51
Shelter, midden	15	25.42
Shelter, Open artefact site	6	10.17
Art (pigmented or engraved)	5	8.47
Potential archaeological deposit (PAD)	5	8.47
Open artefact site	4	6.78
Shelter, Art (pigmented or engraved)	2	3.39
Shelter, midden, burial	2	3.39
Midden, art (pigment or engraved)	1	1.69
Modified tree (carved or scarred)	1	1.69
Total	59	100%

As is typical of Aboriginal sites close to the coastline, shell middens were the most common Aboriginal site feature within the AHIMS search area, representing 59.32% (n=35) of recorded Aboriginal sites in the AHIMS search area. Aboriginal sites follow a strong correlation with water courses, with the majority of Aboriginal sites being recorded near or directly adjacent to water sources – specifically shorelines and rivers. Similarly, most recorded Aboriginal sites being recorded in relatively undeveloped areas such as public greenspaces and parklands. The lack of Aboriginal sites recorded inland is likely the result of the extent of land disturbance associated with urbanisation and industrialisation of the Project Area and environs through the 19th century to present.

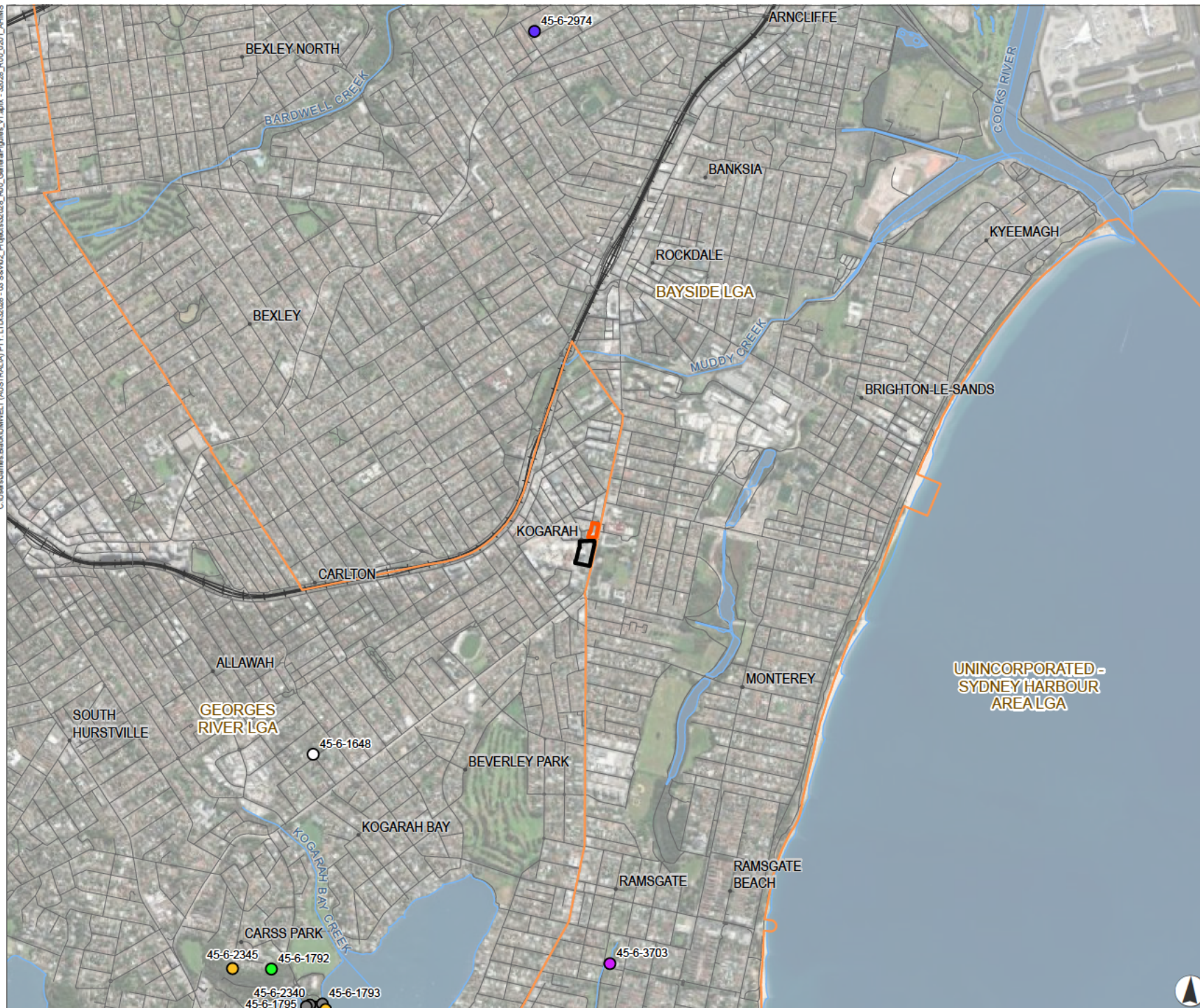


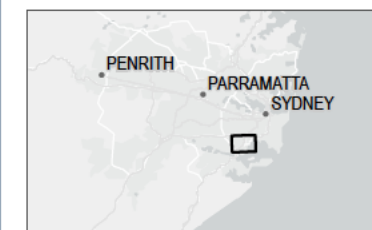
FIGURE 2.1
Aboriginal sites within the AHIMS search area

Legend

- New Clinical Tower (Hogben St)
- St George Private Hospital
- Local Government Area
- Road
- Railway
- Watercourse
- Waterbody

Rationalised site type

- Art (Pigment or Engraved)
- Midden
- Modified Tree (Carved or Scarred)
- Open Artefact Site
- Shelter, Midden
- Shelter, Open Artefact Site



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3.0 Archaeological Potential

3.1.1 Regional Archaeological Context

3.1.1.1 Chronology

Aboriginal habitation of the broader Sydney region is considered to extend back to approximately 35,000 years before present (BP) (Jo McDonald Cultural Heritage management [JMDCHM], 2005), with continuous occupation of the area being acknowledged through to contact with Europeans in 1788 (Williams, *et al.*, 2021). More regionally, Aboriginal occupation of nearby Parramatta and Nepean River has returned ages to between 30,000 and 36,000 years BP (AHMS, 2015; Williams *et al.*, 2012; 2014). These Pleistocene ages, however, are in the minority of dated samples originating from the Sydney region, with the vast majority being within the late-Holocene, and most occurring within the last 2,000 years BP (Przywolnik, 2007). This directional trend in ages can possibly be attributed to steadily increasing Aboriginal population through the late-Pleistocene and Holocene, however, is more like due to preferential preservation of more recent archaeological material and Aboriginal sites (*sensu* Hiscock, 2008). The Sydney Basin bioregion has also been posited to be a refugium during and prior to the last glacial maximum when resource availability was scarce (Williams *et al.*, 2013).

3.1.1.2 Common site types

Archaeological sites in the region are dominated by stone artefacts and artefact scatters, particularly adjacent to waterbodies and creeklines (e.g. Kohen, 1986; Artefact Heritage, 2020). Silcrete is the dominant raw material type, with smaller proportions of chert, tuff, quartz, quartzite, petrified wood and igneous rocks such as basalt and latite (e.g. JMDCHM, 2005; Austral, 2007; Haglund and Associates, 2007; AECOM, 2019). Common tool types include backed blades, as well as edge ground axes being identified (Comber, 2015).

It is important to note that a consistent message across archaeological reports is that the presence or absence of Aboriginal sites cannot be adequately characterised based on surface representation alone (*sensu* JMDCHM, 1997).

Shell middens are relatively common, featuring Sydney Rock Oyster (*Saccostrea glomerata*) and cockle species (e.g. *Anadara* spp.) (Attenbrow, 1990; 1994a; 1994b) however natural shell beds have been identified, potentially complicating archaeological interpretations in some instances (Attenbrow, 1984; McIntyre-Tamwoy, 2003). Middens are common close to estuary mouths or areas of fresh and marine water confluence. A slight deviation from middens which are typically characterised by molluscan shell is the recording of skeletal remains of a dugong (*Dugong dugon*) exhibiting evidence of Aboriginal butchery approximately 3.5 km to the northeast of the Project Area (Etheridge *et al.*, 1896), and dated to 5,520±70 years BP (Haworth *et al.*, 2004).

Warranting specific mention is a midden that was recorded in the early 20th century which identified ancestral Aboriginal remains of two individuals, amongst a midden of *Andara* sp. shell (Buoy; Botany Shell Midden, AHIMS ID# 45-6-0629) located approximately 5.8 km to the east of the Project Area. More recent investigations and surveys conducted by Coast History and Heritage identified the original location described from 1936-7 accounts is incorrect, with the AHIMS site card providing spatial coordinates in line with the described site location. Relocation of the site was not successful during in-field surveys.

While artefacts, scatters and shell middens are the most abundant Aboriginal site types within the broader cultural landscape, other types of sites have been recorded in smaller numbers. These include rock shelters featuring art, scarred trees, quarries, and grinding grooves (e.g. JMDCHM, 2005; AECOM, 2019).

3.2 Preliminary predictive model

The review of existing environmental and archaeological context for the Project Area and regional environs presented in earlier sections of this methodology provides context for the generation of a preliminary predictive model for the potential Aboriginal archaeological resource of the Project Area. The predictive model presented below in **Table 3.1** has been drawn from publicly accessible information and technical studies undertaken across the Sydney region.

3.3 Summary

Based on the extant publicly available literature, and **Table 3.1** above, the following predictive statements regarding the likelihood of Aboriginal sites being present within the Project Area can be made:

- The preservation of Aboriginal objects in their *in situ* depositional context is dependent on the extent and nature of historical development and land surface modification
- Shell middens are the most likely Aboriginal site feature to be encountered
- Stone artefacts and shell midden material are more likely to be found closer to water bodies including fresh- and saltwater sources
- The lack of visible surface Aboriginal objects is not indicative of sub-surface Aboriginal objects
- Relatively undisturbed sections of soil profiles have the potential to preserve Aboriginal objects.

Table 3.1 Predictive model for Aboriginal sites

Site Type	Potential
Modified Trees (scarred or carved)	Low: No culturally modified trees are recorded within the Project Area and its surrounding environs. The Project Area and its surrounds is an entirely built landscape. Mature trees are located in the environs surrounding the Project Area (>1 km), however these are likely ornamental plantings rather than naturally occurring vegetation.
Earth Mounds	Low: Earth mounds have not been recorded within the Project Area and its surrounding environs, nor its surrounds. The landscape surrounding the Project Area is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation.
Hearths	Low: No hearths have not been recorded within the Project Area and its surrounding environs. The Project Area and its surrounds is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation.
Shell Middens	Low: Shell midden sites have been recorded near the Project Area and regionally are common in coastal environments. Coastal environments are present within the surrounding environs of the Project Area. The Project Area and its surrounds is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation.
Quarries	Low: No hearths have been recorded within the Project Area and its surrounding environs, and are rarely recorded on a regional scale. The Project Area and its surrounds is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation.
Open Artefact Sites	Low: Stone artefact sites have been previously recorded in the Project Area and its surrounding environs. The Project Area and its surrounds is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation.
Grinding Grooves	Low: No grinding grooves have been recorded within the Project Area and its surrounding environs, and are rarely recorded on a regional scale. The Project Area and its surrounds is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation.
Ancestral Aboriginal Remains	Low: Sites containing ancestral Aboriginal remains have been recorded near the Project Area. Sites containing ancestral Aboriginal remains are typically associated with rock shelters, or other cultural deposit such as shell midden. The Project Area and its surrounds is an entirely built landscape with extensive vegetation clearing and landscape modification as a result of urbanisation.
Rock Shelters with art and/or deposit	Low: Rock shelter sites will only occur where suitable sandstone exposures or overhangs possessing sufficient sheltered space exist, which are not present in the Project Area.
Aboriginal Ceremony and Dreaming Sites	Low: Aboriginal Ceremony and Dreaming Sites can only be determined during the consultation phase of the Aboriginal Cultural Heritage Assessment. There are currently no recorded mythological stories for the Project Area however they are known to occur in the region.
Contact Sites	Low: There are currently no recorded post-contact sites recorded in the Project Area however they are known to occur in the region.

4.0 Proposed Assessment Approach

4.1 Social/Cultural Values Assessment

In accordance with *the Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010a), each Aboriginal organisation or individual who responded with a written request to be registered for consultation (i.e., Registered Aboriginal Parties [RAPs]) will be included in the Project's program of Aboriginal community consultation. RAP representatives are in the best position to provide information on the Aboriginal social/cultural heritage values of the Project Area. During the assessment process, Umwelt will continue to consult with RAPs regarding the cultural heritage values of the Project Area. This will include as a minimum:

- A request for any initial comments regarding the Aboriginal cultural heritage values of the Project Area in the letter accompanying this draft methodology.
- Discussion of cultural heritage values during fieldwork.
- Provision of a draft Aboriginal Cultural Heritage Assessment report to all RAPs for their review and comment. The draft Aboriginal Cultural Heritage Assessment report will assess the importance of Aboriginal cultural heritage values within the Project Area. In addition, the draft Aboriginal Cultural Heritage Assessment report will assess the potential impact of the proposed development on identified Aboriginal cultural heritage values and identify appropriate mitigation and management strategies to avoid or minimise potential harm to such values. Umwelt will incorporate any comments made within the submission period prior to finalisation of the report.

Any cultural information shared as part of the Project's consultation process and included in the ACHA will remain the property of First Nations peoples and will only be reproduced in the ACHA with permission.

4.2 Proposed Archaeological Survey Methodology

Umwelt propose to conduct a pedestrian archaeological field survey of the Project Area. The primary aims of the survey will be to:

- Identify surface evidence of Aboriginal occupation and/or areas of cultural significance; and
- Characterise the landscape to aid predictions of surface and sub-surface archaeological potential.

The pedestrian surveys will be informed by the predictive model presented in **Section 3.0** of this report, as well as landscape data such as the identification of all watercourses and water bodies (both permanent and ephemeral), and known AHIMS-registered Aboriginal sites within the Project environs.

Both survey stages will be undertaken using the following general methodology:

- 100% of the accessible portions of the Project Area will be surveyed.
- The proposed survey will consist of the survey team evenly spaced walking transects across the Project Area, where possible.
- The survey team will consist of a combined team of an Umwelt archaeologist and RAP representatives.

- Survey and recording according to landform element units and/or other changes in landscape characteristics.
- Recording of beginning and end points of transects or the boundaries of survey units, and the spacing between the survey team.
- Recording of landform, soil information, land surface, vegetation conditions, visibility and exposure, and survey coverage.
- Recording of any identified Aboriginal sites identified according to Requirements 6-8, and recording of any identified Aboriginal objects in accordance with Requirements 18-24 of the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW, 2010b) (Code of Practice).
- If any Aboriginal objects and/or sites are identified in the course of the survey, site cards will be completed and submitted to the AHIMS registrar.
- All Aboriginal objects and/or landforms of interest would be mapped and documented using hand-held GPS, photographs, written description and sketches if relevant.

4.3 Aboriginal Cultural Heritage Assessment Report

An Aboriginal Cultural Heritage Assessment report will be prepared to support approval for development consent under the EP&A Act sought by Ramsay Health Care, and inform an Aboriginal Cultural Heritage Management Plan (if required). The Aboriginal Cultural Heritage Assessment will be prepared in accordance with the following statutory guidelines:

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

The Aboriginal Cultural Heritage Assessment will involve the following key components:

- Consultation with RAPs to identify socio-cultural values of the Project area and places of special significance that should be considered.
- An updated search of the AHIMS register for records of previously registered Aboriginal sites.
- A review of past Aboriginal heritage reports covering the Project Area.
- Environmental landscape analysis to identify past Aboriginal resources and suitable occupation areas.
- Synthesis of background research to develop a predictive model of Aboriginal site location.
- Field investigation to validate the findings of the desktop and identify any previously undocumented cultural material. This would include surface inspection and may extend to test excavations of areas of archaeological interest.

- An assessment of significance for Aboriginal cultural heritage values in the Project Area with input from the registered Aboriginal stakeholders.
- An impact assessment of how the Project will affect Aboriginal cultural heritage values.
- Development of management recommendations based on the results of the assessment and input from RAPs during the consultation process and particularly from the draft Aboriginal Cultural Heritage Assessment review period.

4.4 Research Questions

The aim of the proposed fieldwork program is to investigate the archaeological potential of the Project Area and document associated cultural values. If Aboriginal objects are identified, then the investigation will aim to address a series of research questions. These are provided below:

- Does the Project Area contain, or has the potential to contain, surface and/or subsurface Aboriginal cultural objects, and what is the level of stratigraphic integrity?
- What does the identified assemblage reveal about past Aboriginal land use?
- Is the identified cultural material able to provide further information regarding the types of activities that Aboriginal people were undertaking within the area?
- Is it possible to define discrete areas of activity and/or variability in the nature of occupation based on the artefact assemblage?
- Is the assemblage able to provide information on how past Aboriginal land use changed through time and during variations in environmental conditions?
- What is the age of any identified Aboriginal objects (if present)?
- How does the identified material and its distribution compare to the evidence recovered from excavations in the local area for which data is available?

5.0 References

- AECOM (2019). *Potts Hill to Alexandria transmission cable project: Aboriginal cultural heritage assessment report*. Unpublished report to Transgrid.
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Appendix 7

Responses to Survey Methodology

Brent Koppel

From: Ethan Trewlynn [REDACTED]
Sent: Thursday, 7 August 2025 5:03 PM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital ACHA - Draft methodology

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Hi Brent,

I agree with the methodology for this project as it's up to standards.

1. Are there any other knowledge-holders or Aboriginal stakeholder groups we should be contacting to obtain cultural information on the Project Area? Everyone I know is on the RAP list.
2. Are there any protocols in relation to community interaction and/or cultural heritage that you would like adopted during the Project? I think how it is well keep it as is.
3. Are you aware of any Aboriginal objects, places, sites, or stories of cultural significance and/or importance that you are aware of within the Project Area and/or local environs? If so, please provide guidance on the most culturally appropriate ways in which these Aboriginal objects and/or places can be managed during the assessment process? All over Sydney there are places and stories of cultural importance. A lot of that has been destroyed over time and some hidden. So if anything is found I want it to be returned back to country or have it stored away in safe keeping with someone trusted in the community so nothing faces anymore destruction.
4. Is the information you are providing culturally-sensitive, gender specific, etc? If so, how would you like the information you provide to Umwelt to be managed? Noting that some documentation for the Aboriginal Cultural Heritage Assessment process may be required. Well anything we find could be culturally sensitive and there are all different males and females sites all over Sydney. I would like for someone who has extensive knowledge of these places to be in charge of how it's managed as I was born in Sydney but my family come from other areas. So out respect I would how things are managed to be coming from the traditional owners.
5. Do you require any further information prior to Umwelt proceeding with the Aboriginal Cultural Heritage Assessment? No

Kind regards,

Ethan

On Wed, 6 Aug 2025, 3:00 pm Brent Koppel, <BKoppel@umwelt.com.au> wrote:

Good afternoon,

Thank you for your continuing interest in this Project. Umwelt, on behalf of Akalan, and in accordance with Sections 4.3.1 and 4.3.2 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010), invites you to review and provide comment on the draft Aboriginal Cultural Heritage Assessment methodology for the proposed development at St George Private Hospital, located at Kogarah, NSW.

A brief review of existing environmental and archaeological data for the Project Area is also provided to give context for the proposed assessment methodology. In addition to providing our draft methodology, Umwelt would also like to take this opportunity to request from you any initial comments regarding the cultural values of the Project Area. Umwelt acknowledges that cultural values may incorporate a wide range of values such as stories, traditions, and cultural practices, and we welcome advice from the Aboriginal community about tangible and intangible cultural values relevant to the Project Area and its surrounds. Umwelt is available to discuss any information are willing to share and will respect confidentiality where requested.

We would appreciate any information regarding the following:

1. Are there any other knowledge-holders or Aboriginal stakeholder groups we should be contacting to obtain cultural information on the Project Area?
2. Are there any protocols in relation to community interaction and/or cultural heritage that you would like adopted during the Project?
3. Are you aware of any Aboriginal objects, places, sites, or stories of cultural significance and/or importance that you are aware of within the Project Area and/or local environs? If so, please provide guidance on the most culturally appropriate ways in which these Aboriginal objects and/or places can be managed during the assessment process.
4. Is the information you are providing culturally-sensitive, gender specific, etc? If so, how would you like the information you provide to Umwelt to be managed? Noting that some documentation for the Aboriginal Cultural Heritage Assessment process may be required.
5. Do you require any further information prior to Umwelt proceeding with the Aboriginal Cultural Heritage Assessment?

In your response, can you please also clearly identify who you would like Umwelt to talk to within your organisation, and provide contact details for these individuals. Please also ensure your preferred method of communication (e.g., telephone call, e-mail, letter, etc) is highlighted for subsequent stages of the Project.

Please provide feedback or comments on the draft assessment methodology by **Wednesday 3 September 2025**.

If you have any questions, please contact me using the details provided below.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

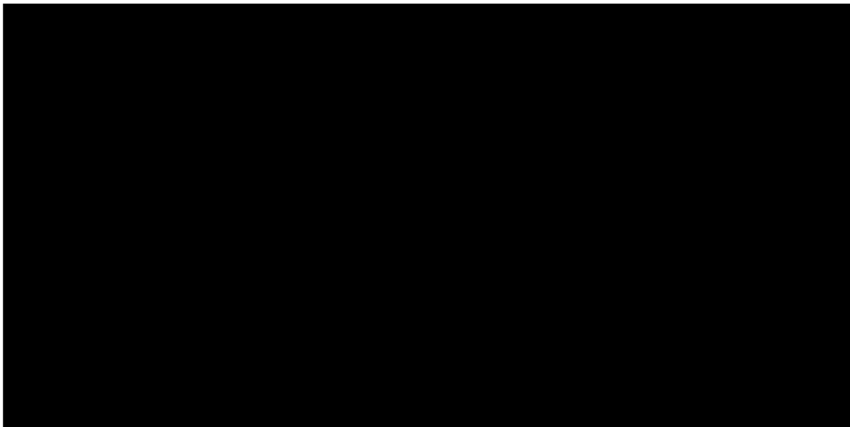
w. **www.umwelt.com.au**



Brent Koppel

From: Carolyn .H [REDACTED]
[REDACTED] 10 August 2025 4:13 PM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital ACHA - Draft methodology
Attachments: A1.PL.2026.pdf; A1.WC.2026.pdf

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*



Hi,

I have reviewed the document and fully support the Information and Methodology.

I would like to be included in all meetings, reports, sharing of cultural information, and fieldwork.

[I have attached A1 Indigenous Services Insurances.](#)

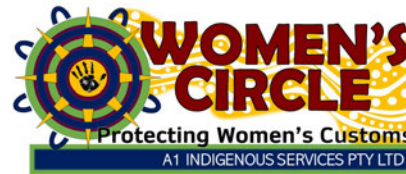
[A1 INDIGENOUS SERVICES, Represents over 100 Indigenous Locals](#)

I agree to my details being shared with OEH and the LALC. Please feel free to contact me using the details provided above.

Kind regards,
Carolyn & Julie Hickey

A1 Indigenous Services is a 100% Indigenous-owned Australian company offering a range of services to the construction industry. Our mission is to commit to an innovative approach for a better future for Indigenous employment and community, while improving ways to close

the gap in Aboriginal participation in the construction industry. We are dedicated to building strength in Aboriginal communities and our Indigenous labour force.



A1 Indigenous Services is a member of the NSW Indigenous Chamber of Commerce (NSWICC). A business or enterprise carrying the NSWICC Assured logo has met national policy requirements as upheld by FACCI, ensuring that it is identified as a First Nations business owner or entrepreneur and that it demonstrates compliance with government and industry regulators.



From: Brent Koppel <BKoppel@umwelt.com.au>
Sent: Wednesday, 6 August 2025 3:00 PM
To: Brent Koppel <BKoppel@umwelt.com.au>
Subject: 32028 - St George Private Hospital ACHA - Draft methodology

Good afternoon,

Thank you for your continuing interest in this Project. Umwelt, on behalf of Akalan, and in accordance with Sections 4.3.1 and 4.3.2 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010), invites you to review and provide comment on the draft Aboriginal Cultural Heritage Assessment methodology for the proposed development at St George Private Hospital, located at Kogarah, NSW.

A brief review of existing environmental and archaeological data for the Project Area is also provided to give context for the proposed assessment methodology. In addition to providing our draft methodology, Umwelt would

also like to take this opportunity to request from you any initial comments regarding the cultural values of the Project Area. Umwelt acknowledges that cultural values may incorporate a wide range of values such as stories, traditions, and cultural practices, and we welcome advice from the Aboriginal community about tangible and intangible cultural values relevant to the Project Area and its surrounds. Umwelt is available to discuss any information are willing to share and will respect confidentiality where requested.

We would appreciate any information regarding the following:

1. Are there any other knowledge-holders or Aboriginal stakeholder groups we should be contacting to obtain cultural information on the Project Area?
2. Are there any protocols in relation to community interaction and/or cultural heritage that you would like adopted during the Project?
3. Are you aware of any Aboriginal objects, places, sites, or stories of cultural significance and/or importance that you are aware of within the Project Area and/or local environs? If so, please provide guidance on the most culturally appropriate ways in which these Aboriginal objects and/or places can be managed during the assessment process.
4. Is the information you are providing culturally-sensitive, gender specific, etc? If so, how would you like the information you provide to Umwelt to be managed? Noting that some documentation for the Aboriginal Cultural Heritage Assessment process may be required.
5. Do you require any further information prior to Umwelt proceeding with the Aboriginal Cultural Heritage Assessment?

In your response, can you please also clearly identify who you would like Umwelt to talk to within your organisation, and provide contact details for these individuals. Please also ensure your preferred method of communication (e.g., telephone call, e-mail, letter, etc) is highlighted for subsequent stages of the Project.

Please provide feedback or comments on the draft assessment methodology by **Wednesday 3 September 2025**.

If you have any questions, please contact me using the details provided below.

Cheers,

Brent

Brent Koppel
Archaeologist

p. **1300 793 267**
m. **0400 124 244**
w. **www.umwelt.com.au**



Brent Koppel

From: Amanda De Zwart [REDACTED]
Sent: Friday, 22 August 2025 8:18 AM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital ACHA - Draft methodology

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Hi Brent,

Thank you for your email and for providing the draft methodology for the Aboriginal Cultural Heritage Assessment at St George Private Hospital. I have reviewed the document and am pleased to inform you that Amanda Hickey Cultural Services supports the proposed methodology.

Additionally, I would like to request to be included in the fieldwork for this project. I believe my participation would be beneficial, and I am eager to contribute to the assessment process.

Thank you once again for your efforts and consideration. I look forward to your response.

Best regards, Amanda

Get [Outlook for Android](#)

From: Brent Koppel [REDACTED]
Sent: Wednesday, August 6, 2025 3:00:07 PM
To: Brent Koppel <BKoppel@umwelt.com.au>
Subject: 32028 - St George Private Hospital ACHA - Draft methodology

Good afternoon,

Thank you for your continuing interest in this Project. Umwelt, on behalf of Akalan, and in accordance with Sections 4.3.1 and 4.3.2 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010), invites you to review and provide comment on the draft Aboriginal Cultural Heritage Assessment methodology for the proposed development at St George Private Hospital, located at Kogarah, NSW.

A brief review of existing environmental and archaeological data for the Project Area is also provided to give context for the proposed assessment methodology. In addition to providing our draft methodology, Umwelt would also like to take this opportunity to request from you any initial comments regarding the cultural values of the Project Area. Umwelt acknowledges that cultural values may incorporate a wide range of values such as stories, traditions, and cultural practices, and we welcome advice from the Aboriginal community about tangible and intangible cultural values relevant to the Project Area and its surrounds. Umwelt is available to discuss any information are willing to share and will respect confidentiality where requested.

We would appreciate any information regarding the following:

1. Are there any other knowledge-holders or Aboriginal stakeholder groups we should be contacting to obtain cultural information on the Project Area?
2. Are there any protocols in relation to community interaction and/or cultural heritage that you would like adopted during the Project?

3. Are you aware of any Aboriginal objects, places, sites, or stories of cultural significance and/or importance that you are aware of within the Project Area and/or local environs? If so, please provide guidance on the most culturally appropriate ways in which these Aboriginal objects and/or places can be managed during the assessment process.
4. Is the information you are providing culturally-sensitive, gender specific, etc? If so, how would you like the information you provide to Umwelt to be managed? Noting that some documentation for the Aboriginal Cultural Heritage Assessment process may be required.
5. Do you require any further information prior to Umwelt proceeding with the Aboriginal Cultural Heritage Assessment?

In your response, can you please also clearly identify who you would like Umwelt to talk to within your organisation, and provide contact details for these individuals. Please also ensure your preferred method of communication (e.g., telephone call, e-mail, letter, etc) is highlighted for subsequent stages of the Project.

Please provide feedback or comments on the draft assessment methodology by **Wednesday 3 September 2025**.

If you have any questions, please contact me using the details provided below.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



Brent Koppel

From: Thomas Dahlstrom [REDACTED]
[REDACTED] 25 August 2025 12:52 PM
To: Brent Koppel
Subject: Re: 32028 - St George Private Hospital ACHA - Draft methodology

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

I have read thru the methodology and I don't have a problem with the modus operandi.

Regards

Thomas D

On 6 Aug 2025, at 3:00 pm, Brent Koppel <BKoppel@umwelt.com.au> wrote:

Good afternoon,

Thank you for your continuing interest in this Project. Umwelt, on behalf of Akalan, and in accordance with Sections 4.3.1 and 4.3.2 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010), invites you to review and provide comment on the draft Aboriginal Cultural Heritage Assessment methodology for the proposed development at St George Private Hospital, located at Kogarah, NSW.

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4. Is the information you are providing culturally-sensitive, gender specific, etc? If so, how would you like the information you provide to Umwelt to be managed? Noting that some documentation for the Aboriginal Cultural Heritage Assessment process may be required.

5. Do you require any further information prior to Umwelt proceeding with the Aboriginal Cultural Heritage Assessment?

In your response, can you please also clearly identify who you would like Umwelt to talk to within your organisation, and provide contact details for these individuals. Please also ensure your preferred method of communication (e.g., telephone call, e-mail, letter, etc) is highlighted for subsequent stages of the Project.

Please provide feedback or comments on the draft assessment methodology by **Wednesday 3 September 2025**.

If you have any questions, please contact me using the details provided below.

Cheers,

Brent

Brent Koppel

Archaeologist

p. **1300 793 267**

m. **0400 124 244**

w. **www.umwelt.com.au**



<32028_R01_St George Hospital ACHA draft methodology_V1.pdf>

Appendix 8

Issuing of Draft Report



Brent Koppel

From: Brent Koppel
Sent: Friday, 3 October 2025 1:37 PM
To: Brent Koppel
Cc: Luke Wolfe; Melissa Moritz; 'Raphael Pullin'
Subject: 32028 - St Private Hospital Expansion ACHA - Draft for RAP review
Attachments: 32028_R02_St George ACHA_V2.pdf

Good afternoon,

Thank you for your continued interest and involvement in the Aboriginal cultural heritage investigations at the St George Private Hospital Expansion Project Area, Kogarah., NSW (the Project).

Umwelt, on behalf of Akalan, and in accordance with Sections 4.4.2 and 4.4.3 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010), invites you to review and provide comment on the draft Aboriginal Cultural Heritage Assessment (ACHA) of the St George Private Hospital Expansion Project Area. Umwelt requests that you provide a response by **Friday 31 October**.

Please note, the draft ACHA provided in this email does not include the full consultation records relating to the Project. A copy of the consultation records can be provided upon request.

If you have any comments or questions regarding the draft report, please reply to this email or phone me using the number provided below.

Kind regards,

Brent

Brent Koppel

Archaeologist

P 1300 793 267 **M** 0400 124 244 **W** umwelt.com.au



Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky. We pay our respects to Elders past and present.

Appendix 9

RAP Responses to Draft Report

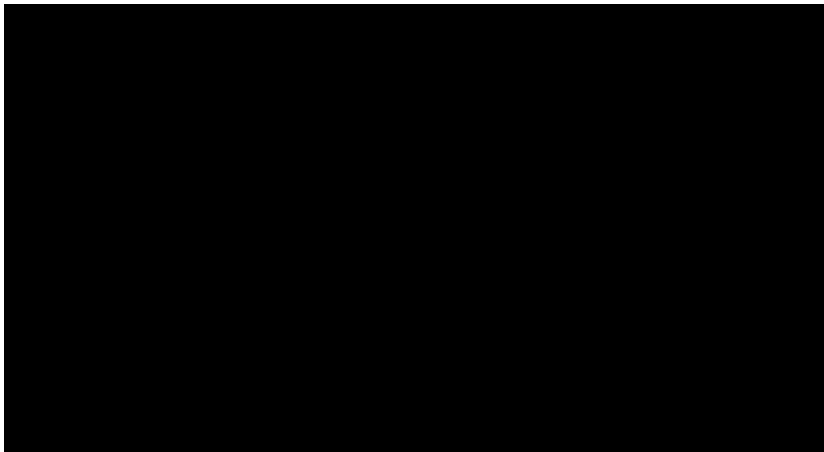


Brent Koppel

From: Carolyn .H [REDACTED]
Sent: Saturday, 4 October 2025 8:42 PM
To: Brent Koppel
Subject: Re: 32028 - St Private Hospital Expansion ACHA - Draft for RAP review
Attachments: A1.PL.2026.pdf; A1.WC.2026.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*



Good day,

I have reviewed the document and fully support the Information and Methodology.

I would like to be included in all meetings, reports, sharing of cultural information, and fieldwork.

I have attached A1 Indigenous Services Insurances.

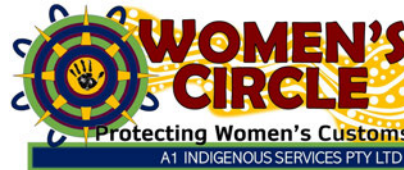
A1 INDIGENOUS SERVICES, Represents over 100 Indigenous Locals

I agree to my details being shared with OEH and the LALC. Please feel free to contact me using the details provided above.

Kind regards,

Carolyn & Julie Hickey

A1 Indigenous Services is a 100% Indigenous-owned Australian company offering a range of services to the construction industry. Our mission is to commit to an innovative approach for a better future for Indigenous employment and community, while improving ways to close the gap in Aboriginal participation in the construction industry. We are dedicated to building strength in Aboriginal communities and our Indigenous labour force.



A1 Indigenous Services is a member of the NSW Indigenous Chamber of Commerce (NSWICC). A business or enterprise carrying the NSWICC Assured logo has met national policy requirements as upheld by FACCI, ensuring that it is identified as a First Nations business owner or entrepreneur and that it demonstrates compliance with government and industry regulators.



From: Brent Koppel <BKoppel@umwelt.com.au>
Sent: Friday, 3 October 2025 1:36 PM
To: Brent Koppel <BKoppel@umwelt.com.au>
Cc: Luke Wolfe <lwolfe@umwelt.com.au>; Melissa Moritz <mmoritz@umwelt.com.au>; Raphael Pullin <rpullin@akalan.com.au>
Subject: 32028 - St Private Hospital Expansion ACHA - Draft for RAP review

Good afternoon,

Thank you for your continued interest and involvement in the Aboriginal cultural heritage investigations at the St George Private Hospital Expansion Project Area, Kogarah., NSW (the Project).

Umwelt, on behalf of Akalan, and in accordance with Sections 4.4.2 and 4.4.3 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010), invites you to review and provide comment on the draft Aboriginal Cultural Heritage Assessment (ACHA) of the St George Private Hospital Expansion Project Area. Umwelt requests that you provide a response by **Friday 31 October**.

Please note, the draft ACHA provided in this email does not include the full consultation records relating to the Project. A copy of the consultation records can be provided upon request.

If you have any comments or questions regarding the draft report, please reply to this email or phone me using the number provided below.

Kind regards,

Brent

Brent Koppel

Archaeologist

P 1300 793 267 **M** 0400 124 244 **W** umwelt.com.au



Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky. We pay our respects to Elders past and present.

Brent Koppel

From: Robert Young [REDACTED]
Sent: Tuesday, 7 October 2025 10:39 AM
To: Brent Koppel
Cc: Luke Wolfe; Melissa Moritz; Raphael Pullin
Subject: Re: 32028 - St Private Hospital Expansion ACHA - Draft for RAP review

Follow Up Flag: Follow up
Flag Status: Flagged

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Hi Brent,

I hope you're well. I wanted to let you know that KACHS reviewed the ACHA draft for the St George Private Hospital Expansion Project. It was incredibly informative and thorough, so thank you for sharing it.

For future reference, we wanted to mention that there are some additional resources that could be helpful. Specifically, the Connecting to Country guidelines might provide valuable insights. Additionally, Aunty Pam suggested looking up Paul Irish for further information.

Thanks again for your hard work on this project. If you have any questions or need further input from our end, feel free to reach out.

Yours In Culture,
Robert Young

[REDACTED]

From: Brent Koppel <BKoppel@umwelt.com.au>
Sent: Friday, October 3, 2025 1:36:34 PM
To: Brent Koppel <BKoppel@umwelt.com.au>
Cc: Luke Wolfe <l Wolfe@umwelt.com.au>; Melissa Moritz <mmoritz@umwelt.com.au>; Raphael Pullin <rpullin@akalan.com.au>
Subject: 32028 - St Private Hospital Expansion ACHA - Draft for RAP review

Good afternoon,

Thank you for your continued interest and involvement in the Aboriginal cultural heritage investigations at the St George Private Hospital Expansion Project Area, Kogarah., NSW (the Project).

Umwelt, on behalf of Akalan, and in accordance with Sections 4.4.2 and 4.4.3 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010), invites you to review and provide comment on the draft Aboriginal Cultural Heritage Assessment (ACHA) of the St George Private Hospital Expansion Project Area. Umwelt requests that you provide a response by **Friday 31 October**.

Please note, the draft ACHA provided in this email does not include the full consultation records relating to the Project. A copy of the consultation records can be provided upon request.

If you have any comments or questions regarding the draft report, please reply to this email or phone me using the number provided below.

Kind regards,

Brent

Brent Koppel

Archaeologist

P 1300 793 267 **M** 0400 124 244 **W** umwelt.com.au



Umwelt acknowledges the Traditional Owners of Country throughout Australia and their continuing values, culture and connection to the land, waters and sky. We pay our respects to Elders past and present.



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NSW | ACT | WA | QLD | VIC | SA **ABN** 18 059 519 041