

# **Greenwich Hospital, Aboriginal Cultural Heritage Assessment Report**

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**Report Prepared for  
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## EXECUTIVE SUMMARY

Cultural Heritage Connections Pty Ltd was commissioned by HammondCare in May 2018 to undertake an Aboriginal Cultural Heritage Assessment (ACHA) of a proposed redevelopment of Greenwich Hospital. Greenwich Hospital is located at 97 – 115 River Road, Greenwich, NSW. The proposed redevelopment has been designed to increase the service potential and amenity of the site.

The development application for the proposal is being assessed as a State Significant Development (SSD 8699). Secretary's Environmental Assessment Requirements for the project include a requirement to identify and describe the Aboriginal cultural heritage values that exist across the whole area that would be affected by the development.

This ACHAR and has been compiled to meet the SEARs and with reference to:

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

Fifteen Aboriginal stakeholder groups registered interest for this project during the notification process. The groups either responded to the advertisement in the North Shore Times 27/6/2018 or to an invitation to register in the project (after their contact details were provided by notified organisations).

It is acknowledged that the project area would have been part of a landscape of significance to the Aboriginal people who occupied the area in the past and sites have been recorded in the local area. While the region undoubtedly has significance to Aboriginal people, no specific heritage values for the project area requiring ongoing management were identified.

No Aboriginal objects have been recorded within the project area. No declared Aboriginal Place is located within the project area. The project area has not been subject of any previous Aboriginal Heritage Impact Permit (AHIP). Archaeological assessment found that there is some archaeological potential within a small portion of the project impact area.

The project area has been cleared in the past. Current ground surfaces are a combination of artificial hard surface, landscaped garden and some grassed areas. Introduced fill is present.

On the basis of the findings of the assessment the following recommendations are provided:

- 1) In the parts of the project area assessed as having low archaeological potential and low potential to contain Aboriginal objects, it is recommended that there are no objections to the development on Aboriginal archaeological grounds.
- 2) In the area identified as having moderate potential to contain Aboriginal objects (Figure 5) impacts should be minimised.



- a) If rock overhangs are uncovered / made accessible during landscaping works further archaeological inspection should be undertaken to determine whether Aboriginal objects are present. If necessary, a cultural heritage management plan should be put in place to prevent unforeseen indirect or direct impacts to Aboriginal objects.
  - b) As development consent is being sought for Concept Plan approval, development impacts in the area of moderate archaeological potential can be minimised by design refinements, if required, at the subsequent detailed DA stage. These design refinements could include minor repositioning of building footprints; and/or a pier and beam structural system to avoid extensive excavation. Many trees in the area will be retained and disturbance to ground surface area will be kept to a minimum. In light of this, the likelihood of impact to Aboriginal objects in this area is low. When the development footprint and construction methods are finalised, impacts should be managed via a construction management plan.
  - c) Consideration should be given to interpretation of cultural values to be incorporated in to the open space areas within the development.
- 3) A protocol should be put in place to deal with any unexpected Aboriginal objects that may be located during the course of the project. This should be included in the construction management plan or equivalent documentation. A draft protocol is presented below.
  - 4) In the extremely unlikely event that suspected human remains are found the *Coroners Act 2009* requires that all work must cease, the site should be secured and the NSW Police and the NSW Coroner's Office should be notified. If the remains are found to be Aboriginal, OEH and the LALC should be contacted to assist in determining appropriate management.

## Ongoing management to protect Aboriginal Objects

An AHIP is not required for SSD. Therefore, if Aboriginal objects were located during the project they could be managed according to the agreed protocol. The following is a suggested procedure to deal with unexpected finds during the life of the project.

- On-site employees or contractors involved in ground surface disturbance should be made aware of the statutory obligations that apply to the discovery of Aboriginal objects prior to the commencement of works.
- If a suspected Aboriginal object is located during construction, works should cease in the vicinity of the find and a fully qualified archaeologist with experience in archaeological excavation and identifying Aboriginal objects and should be called to site to determine the nature of the object.
  - If it is confirmed that it is an Aboriginal object and it is in an isolated context (i.e. it is not likely that *in situ* deposit or further items will be present), its location can be recorded and it can be removed and the works continue. The RAPs should be contacted regarding appropriate long-term management of the object.

- If it is confirmed that it is an Aboriginal object and it is suspected that further material or in situ deposit could be present the RAPs should be contacted to determine an appropriate excavation strategy to salvage the in situ objects.
- Consideration should be given to relocating any Aboriginal objects removed from the site back into a secure place within the project area.
- If the item is found to not be an Aboriginal object, works may continue.

## 1.0 INTRODUCTION

Cultural Heritage Connections Pty Ltd was commissioned by HammondCare in May 2018 to undertake an Aboriginal Cultural Heritage Assessment (ACHA), including an Archaeological Technical Report (ATR) of a proposed upgrade of Greenwich Hospital.

### 1.1 PROJECT AREA & PROJECT CONTEXT

Greenwich Hospital is located at 97 – 115 River Road, Greenwich, also known as Lot 3 and Lot 4 DP 584287. The subject site is zoned SP2 Infrastructure (Health Service Facilities) under Lane Cove Local Environmental Plan 2009 (LEP).

The site is roughly rectangular in shape and incorporates an area of approximately 3.4 hectares. The site has road frontages to River Road and St Vincent's Road. An internal road network provides vehicular access across the site.

The location of the project area is shown in Figure 1.

Greenwich Hospital has operated from the site since 1966. HammondCare has owned and operated Greenwich Hospital since 2008. Lot 3 DP 584287 contains the existing Greenwich hospital, associated inpatient and outpatient facilities, car parking and service areas. Existing buildings range between 1 and 5 storeys in height and are interconnected through internal corridors and external pathways. The site is serviced by water, sewer, telecommunication and power services.

The existing buildings and associated facilities are shown in Figure 2. The L-shape heritage curtilage is legally known as Lot 4 DP 584287 and contains the two-storey late Victorian house known as 'Pallister' and grounds. 'Pallister' is listed as state heritage item (SHR 00574). The components of the curtilage area that contribute to the significance of Pallister House are:

- Pallister the two-storey late Victorian house;
- Tear-drop shaped carriage loop;
- Mature fig tree; and
- Bridle path from the corner of River Road and St Vincent's Road towards 'Pallister'.

No demolition, alterations or additions are proposed to Pallister.

The Concept Plan for the proposed redevelopment of Greenwich Hospital has been designed to increase the service potential and amenity of the site. The Concept Plan proposal seeks to replace existing hospital accommodation with the following:

- 150 place Hospital Health Care Facility with a mix of inpatient hospital beds, palliative care beds and aged care beds ;
- Inpatient and outpatient support services and areas necessary to provide a modern, attractive health facility consistent with Hammond Care's high standard of care;
- 80 new seniors housing (apartments) addressing River Road;
- 9 new seniors housing (villas) addressing St Vincents Road;

- Pallister House will be retained and continue to fulfil its present functions; and
- Car parking generally in accordance with code requirements.

The development application for the proposal is being assessed as a State Significant Development (SSD 8699). For an SSD where Aboriginal objects will be subject to impact, there is no requirement for an Aboriginal heritage impact permit under section 90 of the *National Parks and Wildlife Act 1974*. Instead, Secretary's Environmental Assessment Requirements (SEARs) are developed according to guide the preparation of an Environmental Impact Statement (EIS) for approval by Department of Planning (DoP).

Key Issue number 11 the SEARs for the Greenwich Hospital redevelopment states:

- Where relevant, address Aboriginal Cultural Heritage in accordance with the *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011) and *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

No Aboriginal objects have been previously recorded within the project area boundaries. A due diligence assessment for the current project was undertaken by GML Heritage (2018). The assessment found that the project area had some potential to contain Aboriginal objects, and additional assessment was recommended. The scope of the assessment did not include Aboriginal cultural values of the project area.

This report has been produced in accordance with the following OEH guidelines:

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





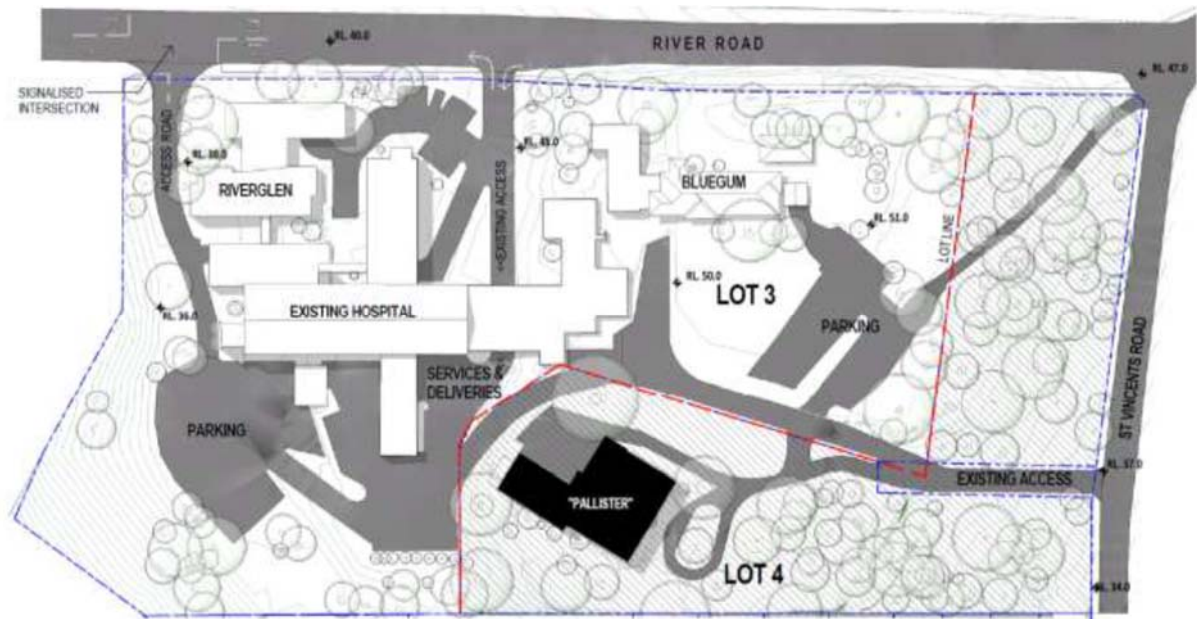
0 0.5 1 1.5 km

**Figure 1: Project area location**

Maps and figures in this document may be based on third party data, may not be to scale and are intended as a guide only. We do not warrant the accuracy of such maps or figures.



**Figure 2: Existing site layout**



## **1.2 LIMITATIONS AND AUTHORSHIP**

No assessment of non-Aboriginal archaeological potential has been undertaken. Analysis of the archaeological background, design of the methodology, field inspection and reporting for the assessment was undertaken by Vanessa Hardy (BA Hons), archaeologist and Director of Cultural Heritage Connections Pty Ltd.

## **1.3 REPORT OUTLINE**

The following section (Section 2.0) provides detail on the environmental context for the project. Section 3.02.0 details the consultation process undertaken. Section 4.0 provides a summary of the archaeological and historic background of the project area. and Section 5.0 discusses cultural values. Section 6.0 considers the impacts of the proposed activity, while Section 7.0 provides a discussion and presents recommendations arising from the assessment.

## **2.0 ENVIRONMENTAL CONTEXT**

Analysis of the environmental context is essential for developing accurate models of cultural activity, site distribution patterns and the archaeological potential of any given area. Environmental characteristics influence the types of archaeological sites. An understanding of how the landscape looked and behaved in the past can help us to predict where Aboriginal people may have undertaken various activities and therefore the types of archaeological sites that may be found in the present. In addition, environmental processes influence the preservation of sites. Heavy erosion or acidic soils are likely to destroy or damage certain types of evidence, reducing the likelihood of locating evidence of past occupation. Certain environmental aspects may also have significance for Aboriginal people both in the past and in the present.

The study area is located within the Sydney Basin. Its environmental setting is discussed below.

### **2.1 GEOLOGY & LANDSCAPE**

The study area is within the Harbour Foreshores physiographic region of the Sydney Basin, south of the Hornsby Plateau (Chapman and Murphy 1989). The Sydney Basin is underlain by Triassic sediments, which dip gently from the east and north towards a central lowland situated south-west of Parramatta. As the basin rises to the north it is transacted by the drowned river valleys of the Parramatta and Georges Rivers. The action of these rivers has exposed the underlying Hawkesbury Sandstone and produced the 'rugged to undulating' valleys of the Harbour Foreshores physiographic region (Chapman and Murphy 1989).

Stone suitable for tool manufacture occurs across the Sydney Basin. Recorded artefacts have been made from silcrete, chert, 'indurated mudstone'/'silicified tuff', quartz, quartzite and basalt. Many of these materials can be commonly found as cobbles or boulders eroding out of deposits near creek lines.

The project area is located on an upper slope landform near a locally elevated crest. The topography of the site rises towards the centre from the south-eastern and south-western property boundaries, with the south-western part of the site falling steeply away towards Gore Creek.

Availability of water is a critical factor for occupation for Aboriginal people as it not only sustains their families and groups but also attracts flora and fauna that are important food, medicinal and shelter resources. Where permanent water is located through fresh water springs and higher stream order watercourses, for example, third, fourth and fifth order streams and confluences (following Strahler (1952)), larger Aboriginal camp sites or areas of repeated visits/camping are more likely to be identified. The survival of such sites is dependent on the impacts of subsequent land use and erosion.

There are no permanent water sources within the project area. There may have been minor drainage lines, although the extent of development makes these hard to reconstruct. The closest reliable water source is Gore Creek, approximately 60 metres to the southwest. There is a steep drop to the creek at this location where it is approximately 500-600 metres from its confluence with the Lane Cove River. Part of the creek has been infilled for sporting grounds. Prior to infilling, the creek would have been a wide estuary

at this location. It is likely that the proximity of the varied resource zones of freshwater and the nearby tidal section of the Lane Cover River would have been attractive to the past inhabitants.

## **2.2 SOILS**

Soil landscapes are a division of soils that have common soil attributes and landform features. The project area is mapped as partly within the GyMEA erosional soil landscape and partly within the Hawkesbury colluvial soil landscape (Chapman, et al. 1989).

The GyMEA soil landscape is common along the Harbour foreshores as well as the Lane Cove, Parramatta and Georges Rivers. It is based on a Hawkesbury Sandstone geology. The landscape of this soil type is typically undulating to rolling low hills. Slopes range from 10 to 25% with local relief of 20-80 metres. The sideslopes include varying width sandstone benches (10-100 metres) often forming broken scarps (Chapman and Murphy 1989). In this locality the GyMEA landscape sits in the elevated areas/ridges above the Hawkesbury colluvial soil landscape of the waters edges of the Lane Cove and Parramatta Rivers.

Topsoil (A1 horizon) of the GyMEA Landscape is a loose, coarse loamy sand to sandy loam, porous with an apedal single grained structure. Its colour can range from brownish-black where high levels of organic matter are present to a bleached dull yellow-orange. Its pH ranges from slightly to strongly acidic. Sandstone and ironstone inclusions are common. Where erosion has occurred underlying clayey sands and sandy clay subsoils can be exposed. Bedrock may also be exposed.

On crests up to 30 centimetres of A Horizon generally overlies bedrock or B Horizon soils. Sideslope soils are discontinuous and rock outcrop may be present. Up to 30 centimetres of A Horizon is commonly present on the inside and outside of benches (Chapman and Murphy 1989).

The Hawkesbury soil landscape is rugged, rolling to very steep hills with local relief of 40-200 metres. Slopes are generally greater than 25% and up to 70% with over 50% rock outcrop at the surface. Valleys are narrow and incised. Dominant soils are a loose coarse quartz sand (sand to sandy loam) occurring as a topsoil and a clayey sand to sandy clay loam B or C horizon in association with sandstone bedrock. Topsoils are typically varied from a dull yellow orange to a brownish black where organic matter is present becoming lighter at depth. Subsoils are often yellowish with gravel, stone and ironstone-plated sandstone fragments common. The soils are shallow (<50cm) and discontinuous. They are susceptible to sheet erosion, particularly after fire (Chapman and Murphy 1989). Neither soil types are ideal for preserving in situ occupation deposit.

## **2.3 FLORA AND FAUNA**

The project area has been cleared since European settlement. On-site vegetation includes a mix of exotic species and remnant vegetation. In the past, the area would have provided a wide variety of flora and fauna resources for the Aboriginal communities who lived there. The vegetation communities of the greater Sydney area have over 200 species with edible parts (Attenbrow 2002). Many plants were exploited as a minor food resource, for example berries or plant nectars. Wood was used to make canoe poles, weapons, woomeras, boomerangs and was used for firewood. Plant resins were used to fix parts of



tools together. Bark was used for huts, carrying vessels, canoes, shields, fishing lines, bedding, blankets and torches, amongst other things (Attenbrow 2002: 113). Fibres were used to make ropes that could then be used in traps and nets for trapping animals, birds and fish. *Casuarina* species were used for bark for canoes, *Xanthorrhoea* were used for spear shafts and the nectar was also eaten (Gunn 1992). Local knowledge of medicine plants was also an important part of Aboriginal culture.

In the study area vicinity, the higher ridgelines would have contained heaths and woodland (dry sclerophyll) including species such as red bloodwood (*Eucalyptus gummiifera*), yellow bloodwood (*E. eximia*), scribbly gum (*E. haemastoma*), brown stringybark (*E. capitellata*) and old man banksia (*Banksia serrata*). As well as *Banksia*, understory shrub species would have included *Grevillia*, *Hakea*, *Acacia*, *Leptospermum* and *Boronia*. In the slopes to the River taller woodland or open-forest would have occurred with main tree species including Sydney peppermint (*E. piperita*) and smooth-barked apple (*Angophora costata*) (Chapman and Murphy 1989; Benson and Howell 1990). Blue Gum high forest was also known to be present in the shale capped pockets of the local area. The trees of the Blue Gum high forest were highly prized for their timber and were extensively cleared early in the colonial occupation of Sydney (Benson and Howell 1990: 114).

Aboriginal firing of the landscape may have resulted in opening up of grasslands in the valleys and ridge tops, which, in turn, increased the habitat for large macropods. Most Australian land mammals are available all year around as they are not migratory; however, some may be easier to catch at certain times, for example possums are less active in the winter months. Possums are frequently referred to as part of the diet of Aboriginal people in Sydney. It was thought that a marked difference would be found between the inland and coastal diet of groups in the Sydney area, due to the coastal availability of fish and shellfish. However, many of the same animal species are found in bone remains excavated at archaeological sites. In general, macropods are common and would have formed an important part of the diet (Attenbrow 2002: 71). Water based plants, birds and animals would also have been exploited in the local area particularly because of the proximity of the coastal lagoons.

Overall, the resources available to inhabitants of the study area region could have provided a varied and generally reliable resource to sustain the many economic and social requirements of large Aboriginal groups.

## 2.4 LAND USE HISTORY

The existing hospital footprint has been largely disturbed from past construction and consists predominantly of manicured lawns and garden plantings. Cut and fill has taken place to create level services. The perimeter of the site is characterised by remnant vegetation that contributes to the character of the site and provides a visual buffer from surrounding areas.

The history of post-contact development of the project area is detailed in the historic archaeological assessment (GML Heritage 2018). The following is a brief summary of the information contained in that report relevant to understanding development impacts.

The assessment identified four phases of development at the site:

1. Early land grants and land ownership (1788-1882)
2. Gentlemen's estate, Pallister House (1883-1937)

3. Girls' school (1937-1946)
4. Pallister Girls' Home and Greenwich Hospital and Pallister (1946- present)

The project area appears to have been undeveloped prior to 1883 when it was purchased by John St Vincent Welch. After initial clearing and landscaping the house now known as 'Pallister' was built in 1892. Various other additions were made to the grounds during the time it remained a private residence, including: tennis courts, a swimming pool, driveway/access road, and various out buildings such as staff quarters and stables/garages. In 1937 the property was purchased by Sydney Church of England Girls' Grammar School. During this time additional sporting facilities were added and some additions to buildings occurred along with a realignment of the previous driveway. It appears that the school only remained on site until 1942 and that it was subsequently used as a Girls' home from 1943. There are no records of major additions during its use as a home. Apart from Pallister house most of the elements still on site date from the period of use as Greenwich Hospital (since 1966). The main hospital buildings and associated administration and accommodation were built in this time. additional landscaping and service installation would also have taken place further reducing the potential for Aboriginal objects to be preserved. Figure 3 and Figure 4 show the 1943 and present layout of the site respectively.

The extent of ground surface disturbance is a major factor in determining whether physical evidence of past Aboriginal occupation of an area will be present. In general, past activities provide an indication of the level of disturbance and correlate to archaeological potential. Table 1 provides a key to levels of disturbance and the likely archaeological potential.

**Table 1: Levels of past land disturbance**

Disturbance Level	Types of Past Activities	Examples in Study Area
<b>HIGH</b> Severe soil disturbance little potential for survival of intact archaeological deposits, displaced objects rarely still occur.	Construction of buildings, graded roads (depending on depth of soils), service trenches for sewers etc., dams, high erosion, intensive and/or repeated landscaping or cultivation.	Hospital buildings and landscaped areas, access roads and services.
<b>MODERATE</b> Some disturbance to soils with some potential for intact archaeological deposits and/or potential for displaced Aboriginal objects.	Clearing or partial clearing, stock activity, light cultivation or ploughing, low erosion.	The eastern portion of Lot 4 DP 584287. This land has been partially cleared and is likely to have been subject to some erosion. However, there is no construction in this area and some potential for intact deposit within rock overhangs.
<b>LOW</b> Partially cleared or grazed, not subject to intensive soil disturbance or erosion therefore retaining potential for intact deposit and objects.	Non-mechanical clearing, stock grazing, either a depositional soil environment or minimal erosion.	Due to erosion it is unlikely that there are areas of low disturbance in the project area.

**Figure 3: 1943 aerial photograph of the project area and surrounds (Source: <https://maps.six.nsw.gov.au/>)**



**Figure 4: Aerial photo of the project area (Source: <https://maps.six.nsw.gov.au/>)**



## **2.1 SUMMARY OF ABORIGINAL OBJECTS**

No Aboriginal objects have been recorded within the project area. No declared Aboriginal Place is located within the project area. The project area has not been subject of any previous Aboriginal Heritage Impact Permit (AHIP).

The archaeological technical report (ATR) undertaken as part of this ACHA (Appendix 1) contains further information on the archaeological assessment of the project area.

## 3.0 CONSULTATION PROCESS

As recognised by OEH, we acknowledge that Aboriginal people are the primary determinants of the cultural significance of their heritage. Aboriginal consultation for the ACHA was undertaken in compliance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (NSW DECCW 2010b) (hereafter referred to as the “ACHRs”). These consultation requirements are legal requirements that proponents must comply with during the ACHA process which are set out in Clause 80c of the NPW Regulation. Aboriginal consultation is crucial in the compilation of the ACHA in order to adequately assess and investigate Aboriginal cultural heritage. Consultation is important with registered Aboriginal stakeholders in this process in order to:

- determine the cultural significance of a project area;
- identify Aboriginal objects of cultural value within a project area; and
- Identify places of Aboriginal cultural value (whether or not they are Aboriginal places declared under Section 84 of the NPW Act).

Table 3 presents a summary of compliance with the ACHRs for the project. a full log of consultation is provided in Appendix 2.

### 3.1 REGISTERED ABORIGINAL PARTIES (RAPs)

Fifteen Aboriginal stakeholder groups registered interest for this project during the notification process. The groups either responded to the advertisement in the North Shore Times 27/6/2018 or to an invitation to register in the project (after their contact details were provided by notified organisations). The groups registered for consultation are listed in Table 2. Copies of correspondence with RAPs are presented in Appendix 3.

**Table 2: Aboriginal parties/individuals who registered interest for the project**

Name of Contact	Registered Aboriginal Party
Seli Storer, CEO	Biamanga
Jennifer Beale	Butucarbin Aboriginal Corporation
Corey Smith, Cultural Heritage Officer	Cullendulla
Gordon Morton	Darug Aboriginal Cultural Heritage Assessments
Celestine Everingham	
Gordon Workman	Darug Land Observations
Darren Duncan	DJMD Consultancy
Paul Boyd	Didge Ngunawal Clan
Lilylea Carroll	
Duncan Falk	Duncan Falk Consultancy
Basil Smith	Goobah Developments
Wendy Smith	Gulaga
Nathan Moran	Metropolitan LALC
Roxanne Smith	Murramarang
Scott Franks	Tocomwall
Phillip Boney	Wailwan Aboriginal Digging Group
Arika Jalomaki	Yulay Cultural Services

Table 3 provides a summary of compliance with the ACHRs for the project. It should be noted that consultation was undertaken through multiple forms of contact with registered Aboriginal parties for correspondence, including express post, email (wherever, possible), text messages and phone calls (where all other forms of contact were exhausted). All submissions provided by the registered groups are provided in full in Appendix 3. The finalised methodology is supplied in Appendix 4.

### **3.2 SUBMISSIONS/COMMENTS ON PROJECT METHODOLOGY**

The purpose of this section of the report is to provide information about the submissions/comments raised by the RAPs during consultation.

Project information and a draft project methodology was sent to all RAPs on 31<sup>st</sup> July 2018. As required by the ACHRs, all input provided has been addressed as part of the consultation process. All RAPs were provided with the opportunity to provide comment on the methodology for this assessment (28 days).

Darug Land Observations provided comment on the project information and draft project methodology (Appendix 3) stating support of the methodology and also noting that they strongly believe that recovered artefacts should be re-buried on Country (project area).

Tocomwall provided the information that they will not review information if not paid and that they will reject all reports if their services are not paid for.

The following groups provided endorsement of the methodology with no comments or changes:

- Yulay Cultural Services
- Duncan Falk Consultancy
- Didge Ngunawal Clan

### **3.3 SITE MEETING/ PRESENTATION OF PROJECT INFORMATION**

An opportunity was provided to all RAPs to attend a site visit on 5<sup>th</sup> September to discuss any questions or cultural concerns and to have any relevant cultural information recorded, as appropriate. RAPs were also free to conduct a survey of the area should they wish.

Jenny Beale and Jack Gibson from Butucarbin Aboriginal Corporation attended the site meeting.

An initial discussion and review of the proposal was undertaken, and hard copy plans provided. This was followed by a walkover of the project areas. Ken McPhail of HammondCare accompanied the RAPs and the archaeologist providing clarification of the proposal plans, where necessary.

The western three quarters of the site has been subject to disturbance from the construction of hospital buildings, roads, services and landscaping including cut and fill earthworks. At the eastern boundary of the site is an area of regenerated bushland that does not appear to have been previously developed (with the exception of the access road that cuts through the area from St Vincents Road). There is a row of sandstone overhangs at the top of the area and the area slopes steeply down to St Vincents Road. Ground surface visibility is low and some of the rock overhangs are inaccessible due to vegetation.

The RAPs identified the eastern portion of the project area as an area of interest due to the lack of disturbance. Suggestions were made to consider an acknowledgement of Aboriginal cultural values within open space. Jenny Beale said she would like to see some of the area preserved. She also wanted to be able to inspect the sandstone shelters/rock overhangs again if the vegetation and landscaping material is cleared from in front of them. A discussion was had about the potential for some interpretive signage and landscaping to include acknowledgement of the prior occupation of Aboriginal people, including ideas such as a bush medicine garden in keeping with the theme of the hospital development.

### **3.4 SUBMISSIONS/COMMENTS ON DRAFT ACHA REPORT**

The draft ACHA (including ATR) was sent to all RAPs on 29 October 2018. The only comment received was from Darug Land Observations on 6 November via email. The comments stated that they support the proposed activities and that if “any artefacts are recovered during the construction stages, we strongly believe that these recovered artefacts should be re-buried on Country”. This has been incorporated into the recommendations with a suggestion to consider reburying any artefacts within the project area.

No specific information relating to cultural values was provided by any of the RAP organisations.



**Table 3 Compliance with the ACHRs**

Stage # of the ACHRS	Step #	Description of Step in the ACHRs	How this step of the ACHRS was complied with
<i>1: Notification of project proposal and registration of interest</i>	1a	<p>Proponents must compile a list of Aboriginal people who have an interest in the proposed project area and hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places from reasonable sources of information which include writing to:</p> <ol style="list-style-type: none"> <li>1. The relevant DECCW EPRG regional office;</li> <li>2. The relevant Local Aboriginal Land Council;</li> <li>3. The National Native Title Tribunal;</li> <li>4. Native Title Services Corporation;</li> <li>5. Relevant local council (s); and</li> <li>6. Relevant catchment management authorities.</li> </ol>	<p>Letters were sent on behalf of the proponent on 22 June 2018, to all of these relevant organisations (via email and/or express post) requesting their input on the names and contact details of Aboriginal people who have an interest in the proposed project area and hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places within the locality of the project area. As catchment management authorities no longer exist a reply was provided by Greater Sydney Local Land Service</p> <p>A closing date of 12 July 2018 was provided to all agencies for a response to this letter.</p>
	1b	<p>Proponent prepares a notification via newspaper which must include:</p> <p>The name and contact details of the proponent;</p> <ul style="list-style-type: none"> <li>▪ A brief overview of the proposed project that may be the subject of an application for an AHIP, including the location of the proposed project;</li> <li>▪ A statement that the purpose of community consultation with Aboriginal people is to assist the proposed applicant in preparing an application for an AHIP and to assist the Director General of OEH in his/her consideration and determination of the application;</li> </ul>	<p>A notification, which complied with these requirements, was placed in the Public Notices section of the <i>North Shore Times</i>, Friday 28 June with closing date for registration of interest included as 14 days from publication (Wednesday 12 July 2018). A copy is provided in Appendix 2.</p>



Stage # of the ACHRS	Step #	Description of Step in the ACHRS	How this step of the ACHRS was complied with
		<ul style="list-style-type: none"> <li>An invitation for Aboriginal people who hold knowledge relevant to determining the cultural significance of Aboriginal object(s) and/or place(s) in the area of the proposed project to register an interest in a process of community consultation with the proposed applicant regarding the proposed activity; and</li> <li>A closing date for the registration of interests.</li> </ul>	
	1c	Proponent writes to the Aboriginal people whose names were provided by organisations in Step 1a to notify them of the proposed project and opportunity to be involved in consultation and places notification in the local newspaper.	Letters were sent to all Aboriginal people provided by organisations (unless they had registered interest already) via email and/or express post on 11 July 2018. Closing date for registrations was, 26 July 2018.
	1d	Proponent records names of Aboriginal people who have registered an interest in being involved in consultation – the ‘registered Aboriginal parties’	Table 2 provides a list of the registered Aboriginal parties, who provided registration of interest for this project.
	1e	Proponent provides a copy of the notification and record of the registered Aboriginal parties to OEH and relevant LALC within 28 days of the closing date for registering an interest.	An email was sent to the Metropolitan Local Aboriginal Land Council and to OEH (via gs.ach@environment.nsw.gov.au) on 5 August 2018 with the names of all groups who had consented to have their details provided.
2: <i>Presentation of the information about the proposed project</i>	2a	Proponent presents and/or provides project information to registered Aboriginal parties.	Project information and a draft project methodology was sent to all RAPs on 31st July 2018. It was sent via email to all RAPs apart from Darug Aboriginal Cultural Heritage Assessments, who had not provided email addresses. This was

Stage # of the ACHRS	Step #	Description of Step in the ACHRS	How this step of the ACHRS was complied with
			sent by express post and followed up by telephone.
	2b	Proponent may create an opportunity for registered Aboriginal parties to visit the proposed project site.	All RAPs were invited to attend a site meeting on 5 September 2018. Two representatives of Butucarbin Aboriginal Corporation attended.
	2c	Proponent records or documents that information on the proposed project has been presented. The record or documentation should include any agreed outcomes and/or contentious issues that may require further discussion (where applicable). Proponent should provide a copy of this record or documentation to registered Aboriginal parties.	No contentious issues were raised this stage during the project information presentation stage or the consultation process for the assessment. As there were no defined impacts or contentious issues, no agreed outcomes were noted.
<i>3: Gathering information about cultural significance</i>	3a	Proponent presents and/or provides the proposed methodology (s) for the cultural heritage assessment to the registered Aboriginal parties for comment. Registered Aboriginal parties have a minimum of 28 days after the proponent provides the methodology (s) to provide written or oral comment.	Project information and a draft project methodology was sent to all RAPs on 31st July 2018. Further information is provided in Section 3.2.
	3b	Proponent considers input provided by registered Aboriginal parties and finalises methodology for implementation. Proponent documents how the input has been considered.	Project methodology was finalised without change (refer to Section 3.2 for further discussion).
	3c	Proponent seeks information from registered Aboriginal parties to identify : a. Whether there are any Aboriginal objects of cultural value; and	Along with the presentation of project information, the draft proposed project methodology and the draft report invitations were provided to discuss these issues.

Stage # of the ACHRS	Step #	Description of Step in the ACHRS	How this step of the ACHRS was complied with
		b. Whether there are places of cultural value (whether or not they are Aboriginal places declared under Section 84 of the NPW Act).	No advice was received from RAPs that any objects or places of cultural value are present within the project area.
	3d	Proponent seeks input from registered Aboriginal parties on potential management options	No Aboriginal objects were identified and no management of tangible heritage required. No intangible heritage requiring management was identified by RAPs.
<i>4: Review of draft cultural heritage assessment report</i>	4a	Proponent prepares draft cultural heritage assessment report and provides it to the registered Aboriginal parties for review and comment.	Completed and provided to the RAPs.
	4b	Registered Aboriginal parties have a minimum of 28 days after the proponent provides the draft report to review and provide written or oral comment.	Reports sent 29/10/2018 with a closing date for comments of 27/11/2018.
	4c	Proponent finalises cultural heritage assessment report. The final report is submitted to OEH for consideration with the proponent's AHIP application.	Report finalised. No requirement for AHIP or submission to OEH at this stage of the project.
	4d	Proponent provides/makes available the final cultural heritage assessment report and AHIP application (if required) to the registered Aboriginal parties, relevant LALCs within 14 days of an AHIP application being made to OEH (if required).	No AHIP application required. Report will be made available to RAPs.

## 4.0 SUMMARY OF BACKGROUND INFORMATION

Aboriginal people have occupied Australia for many thousands of years. It is generally accepted that the earliest habitation dates back at least 60,000 years, but this date may change as further research is carried out. Much of our knowledge of the pre-contact social organisation and behavioural patterns of Indigenous people comes from early non-Indigenous historical records and is, therefore, subject to the historical and cultural biases of the recorders. It is also important to remember that at the time many of the observations were made, the lifestyles of Indigenous communities may have already been dramatically altered by the presence of non-Indigenous settlement. Historical records and ethnographic studies of more recent Indigenous communities can help us to reconstruct past Indigenous behavioural patterns. In combination with archaeological evidence, this enables predictive models for the occupation of an area to be proposed. This background can be used to provide a picture of behaviour in the past and indicate how evidence of that past behaviour might be preserved in the archaeological record. The following sections provide an overview of background information reviewed. Additional information is included in the ATR for this project (Appendix 1).

### 4.1 LENGTH OF OCCUPATION

Archaeological evidence of occupation of the Sydney Basin by Aboriginal people dates back to the Pleistocene period. Timing of the Aboriginal occupation of the Sydney region has been subject of some research. An early date (41,700  $\pm$  3000/-2000 BP (years before present)) was taken from artefacts found in gravels of the Cranebrook Terrace on the Nepean River (Stockton and Holland 1974), however there is some disputes over the actual age of the deposits. A site (RTA-G1) excavated by McDonald (2005) from the Parramatta Sand Sheet in the city centre of Parramatta has been dated to 30,735  $\pm$  407 BP. This date is considered more reliable. A rock shelter site north of Penrith on the Nepean, known as Shaws Creek K2, is another Pleistocene dated site, dated to 14,700  $\pm$  250 BP (Attenbrow 2010:18). More recently, a salvage excavation at Pitt Town on the banks of the Hawkesbury River has the lowest deposits containing artefacts dated to 15,000 BP (Williams, et al. 2012: 95).

The range of dates as evidenced by sites across the region demonstrate that Aboriginal people have inhabited the greater Sydney region for many thousands of years. In light of this it is expected that a range of evidence of that past habitation may be present.

The majority of dated sites within the region are less than 5,000 years old. A combination of reasons has been suggested for this relatively recent dating of most sites. There is an argument that an increase in population and 'intensification' of much of the continent took place around this time leaving a great deal more evidence than the sparser prior occupation. It is also the case that many sites along the coast would have been submerged as the seas rose to approximately their current level around 6,000 years ago. This would have had the effect of covering evidence of previous coastal occupation. In addition, it is also true that the acidic soils that predominate around Sydney do not allow very well for longer-term survival of sites. It has been noted that shell, bone and skin are not likely to survive more than 3-4,000 years, and the oldest dated shell deposits are around 5,500-6,000 years old (Attenbrow 2002: 3).

## 4.2 ETHNOHISTORY

During the thousands of years of Aboriginal occupation of the Sydney Basin, climate and resources would have gone through numerous changes. Inevitably social alliances and groupings would have also changed. Reconstruction of Aboriginal social organisation is based on information about groups living in the region at time of European contact. The complexity of social interaction is in some ways indicated by the variety of languages that were in use across the continent.

It is estimated that around 250 distinct languages were in use at the time of contact. The exact number cannot be known for certain, but 250 is a conservative estimate (Mulvaney and Kamminga 1999: 69-70). Knowledge of the different language groups in a given area is variable.

Around the Sydney area early European recordings noted the names of particular Aboriginal individuals and groups, but were not always clear about which group names represented an individual language and which some other social grouping. There are three known distinct language groupings across the greater Sydney Basin. Each one is likely to have had a number of dialects, but the main three language groups seem to have been the *Darug*, *Gandangara* and *Tharawal*. The term '*Eora*' has been used to describe the language and the Indigenous people of the Sydney region, but early historical accounts do not use it to describe a particular group or affiliation. It is likely that it meant 'people' in the local dialect and later came to be used to describe the people of the area (Attenbrow 2002: 35). It is sometimes still used today to describe the local country or people descended from its original inhabitants.

As with all Aboriginal languages, word spellings tend to vary. The spellings used here are those used by the descendant Aboriginal groups today. The *Darug* language appears to be that spoken in what is now Sydney and was divided into at least two dialects, a coastal and a hinterland.

The coastal *Darug* dialect covered the Sydney peninsula (to the north of Botany Bay and the south of Port Jackson west to Parramatta). It is possible that it also extended to the north of Port Jackson as far as Broken Bay. The hinterland dialect of the *Darug* was spread across the Cumberland Plain, from the Hawkesbury River in the north to Appin in the area south-west of the Georges River, Parramatta, the Lane Cove River and Berowra Creek.

Linguistic groupings were probably not the main social or political entities in day-to-day life for Aboriginal people. Land and resource ownership was centred on smaller units. These various groupings and affiliations in social organisations have been described in differing terms. Groups are often referred to as 'tribes' in historical accounts, although they are generally not 'tribes' in the current anthropological use of the word, rather they are smaller named groups. In the following the terms defined by Attenbrow (2002) have been used.

In general, resource and land ownership was focused on extended family groups or *clans*. These groups are sometimes called local clans, territorial clans or local decent groups. Such clan groups would have varied in size but are likely to have included between 25 and 60 individuals. As it was unlikely to be acceptable to find sexual partners within the family grouping, and for other reasons such as resource sharing, a number of clans would often travel together in a larger group. These groups are referred to as *bands*. Whether the clan

or the band was the most important group politically to an individual is likely to have varied from place to place. Bands do not seem to have been specifically named in the Sydney region. Group borders were generally physical characteristics of the landscape inhabited, such as waterways or the limits of a particular resource. Groups would be likely to include members of different clans and possibly speakers of different dialects (Attenbrow 2002).

Due to the difference in resource availability between the coastal and inland areas, it is frequently assumed that hinterland and coastal groups had very different lifestyles; in summary, coastal people were 'fishers' and inland people were 'hunters'. Another assumption is that the work involved in procuring inland resources by hunting meant that lower population densities would have inhabited the hinterland. The evidence uncovered in archaeological excavations does not support this assumption. It shows that coastal people also exploited a wide range of terrestrial resources, and hinterland people had a variety of riverine resources available for use. More recent studies suggest that the inland areas would have supported a density of at least 0.5 persons per square kilometre compared to 0.75 per square kilometre in the coastal areas around Port Jackson (Attenbrow 2002: 17).

Some lifestyle differences relating to resource availability were inescapable. Groups inhabiting the Hawkesbury Sandstone topography of the coast were able to use sandstone overhangs as shelter. Elsewhere, such as in the study area region, bark huts were common. Collins described huts "made of the bark of a single tree bent in the middle and placed on its two ends on the ground" (Collins in Kohen n.d.: 6). Watkin Tench also gave details of bark huts constructed with pieces of bark placed together to form a low shelter like an 'oven' open at one end and large enough to fit one person lying down (Tench 1996: 53).

Use of bark for such shelters would have resulted in a large number of trees with bark removal scars. Such scarred trees would also have been created when bark was removed for other purposes such as canoe manufacture and manufacture of other items such as carrying vessels (*coolamons*). There is some evidence that coastal groups would travel long distances, even as far inland as Parramatta, to find trees with suitable bark for canoe manufacture (Kohen n.d.).

### **4.3 ARCHAEOLOGICAL CONTEXT**

The site distribution patterns observed for the Harbour Foreshores suggest that shelter sites are more common than open sites. This is likely to be a combination of the fact that activities were focused within the protection of shelters, but also that these areas are generally better preserved/less developed. Shelters not only contain artefact sites but also art. It is likely that large well protected shelters with a good aspect were used repeatedly over time.

Within the sandstone landscapes, open artefacts sites are rarer than on the Cumberland Plain, and most likely to be located close to water. Grinding grooves can occur on flat sandstone surfaces near water.

The *Port Jackson Archaeological Project* was undertaken in the early to mid 1990s partly because it was recognised that the archaeology of Port Jackson and surrounds was comparatively poorly documented (Attenbrow 1990). This is, to a large extent still the case compared to the extensive amount of work that has been carried out on the adjacent

Cumberland Plain. Relatively few excavations have been undertaken in the sandstone geology of Sydney Harbour and its associated rivers. In general terms more sites have been recorded on sandstone geology than shale (Irish 2002: 21-22).

Attenbrow notes that the physical evidence of the activities of the Aboriginal inhabitants was noted by the early non-indigenous settlers. Governor Phillip commented on the observations of rock engravings by exploration parties with the First Fleet and also ordered that the burial mounds along Middle Harbour be investigated (Attenbrow 1990: 1).

The Port Jackson project investigated the distribution of shell middens throughout 8 'sub catchments' including the Lane Cove River. It was concluded that 98% of middens are on Hawkesbury sandstone geology. Most of the known sites occur on Council reserves or Crown Lands with only 8% on private or 'non-reserve' land. The highest density of sites was recorded in Middle Harbour. Over half (61%) of the midden sites and 80% of the archaeological deposits were located within rock shelters with over half of all sites occurring within ten metres of the high-water level. It was also acknowledged that some of these patterns might be due to the relative level of development on ridgelines as opposed to adjacent to the waterfront (Attenbrow 2002).

A landscape such as the project area would have provided access to a number of different resource zones; making it an attractive location for past occupation.

The following table (Table 4), provides a description of site types associated with past Aboriginal occupation as well as an indication of the likelihood of each type occurring in the project area.

**Table 4: Site type definitions**

Site Type	Description
Open Camp Sites/Stone Artefact Scatters/Isolated Finds	<p>Open camp sites represent past Aboriginal subsistence and stone knapping activities, and can include archaeological remains such as stone artefacts and hearths. This site type can be revealed as surface scatters of stone artefacts in areas where vegetation is limited and ground surface visibility increases. Such scatters of artefacts can also be exposed by erosion, land use such as ploughing, and the creation of informal, unsealed vehicle access tracks and walking paths.</p> <p>Sites are often located on dry, relatively flat land along or adjacent to a water source. Sites containing surface or subsurface deposit from repeated or continued occupation are more likely to occur on elevated ground near the most permanent, reliable water sources.</p> <p>Isolated finds may represent a single item discard event, be the result of limited stone knapping activity, or be an artefact that has been displaced from its original location due to erosion or other disturbance. The presence of such isolated artefacts can also indicate the presence of in situ buried archaeological deposit, or additional artefacts obscured by low ground visibility. Isolated artefacts can be located on all landforms associated with past Aboriginal activities.</p> <p>This site type is the most common on the Cumberland Plain. Open sites are less likely to occur in sandstone geology. Due to the amount of development and erosion in the project area there is a low potential for this site type.</p>

Site Type	Description
Scarred or Carved Trees	<p>These sites are trees with scars and/or carved patterns which can be attributed to Aboriginal cultural origin. Tree bark was utilised by Aboriginal people for various purposes, including the construction of shelters (huts), canoes, paddles, shields, baskets and bowls, fishing lines, cloaks, torches and bedding, as well as being beaten into fibre for string bags or ornaments. The removal of bark exposes the heart wood of the tree, resulting in a scar. Trees may also have been scarred in order to gain access to food resources (e.g. cutting toe-holds so as to climb the tree and catch possums or birds), or to mark locations such as tribal territories.</p> <p>Carved trees contain carved patterns on the tree trunk and are often found in association with ceremonial grounds, burials or cultural sites. If trees of sufficient age are present within the project area, there is some potential for this site type. It is likely that past vegetation clearing may have removed all such trees within the project area.</p>
Grinding Grooves	<p>Aboriginal grinding grooves are grooves where Aboriginal people have sharpened or manufactured stone axes and other implements and in some cases, ground seed and grains in the sandstone forming 'bowls'. These sites are most often found in sandstone. This site type can occur where suitable geology is present. Although the project area does contain such geology, there does not appear to be a water source that would have been required for this site type to occur. This and the extent of disturbance make grinding grooves unlikely to occur.</p>
Rock Shelter Sites (closed camp sites)	<p>Rock overhangs in areas of sandstone geology can contain evidence of past Aboriginal occupation. This can include stone artefacts, food refuse such as bone or shell if suitably preserved deposits are present. Shelters also can contain pigment art (see below). The project area contains suitable geology for this site type and there is some potential for shelter sites.</p>
Art Sites	<p>Petroglyphs (also referred to as Rock Engravings) are art sites where marks have been made in stone by Aboriginal people (for example, spirit figures, animals, implements and footprints). These sites are most commonly found on flat exposed open areas of sandstone. Art within rock shelter is usually painted with ochres and pigments on smooth surfaces on the walls of the shelter. The project area is likely to contain rock overhangs, therefore there is some potential for this site type.</p>
Quarries	<p>Aboriginal quarry sites are sources of raw materials, primarily for the manufacture of stone tools, but also for ochre procurement. They are only found where raw materials (stone or ochre) occur within the landscape, and where these have been exploited in the past. Such sites are often associated with stone artefact scatters and stone knapping areas. The project area is unlikely to contain suitable geology for this site type.</p>
Bora/Ceremonial	<p>Aboriginal ceremonial sites have high cultural value to Aboriginal people. They may comprise natural landforms and, in some cases, will also have archaeological material. Bora grounds are a ceremonial site type, usually consisting of a cleared area around one or more raised earth circles, and often comprised two circles of different sizes, connected by a pathway, and accompanied by ground drawings or mouldings of people, animals or deities, and geometrically carved designs on the surrounding trees. These places are more likely to be found below hills or peaks or above low land subject to inundation. These sites are generally determined through community</p>



Site Type	Description
	consultation or sometimes via historic recordings. The background review does not indicate that this type of site will be present in the project area.
Natural Mythological (Ritual) sites	These types of sites are usually identified by the local Aboriginal community as locations of cultural significance, and they may not necessarily contain material evidence of Aboriginal associations with the place. These sites are generally determined through community consultation or sometimes via historic recordings. The background review does not indicate that this type of site will be present in the project area.
Middens	Middens are the accumulation of debris from fish, crustaceans and other shell fish (shells, fish bones) consumed as part of Aboriginal people's diet. Middens also often contain charcoal, stone artefacts, bone and other types of material used by Aboriginal people. Middens often occur within close proximity to freshwater and saltwater sources which have potential to contain mussels, oysters and other types of edible bivalves. Due to the distance to water, this type of site is unlikely.
Burial	Burials can be found in many different archaeological contexts, including shelter deposits and most often where the ground is soft and sandy. Burials can also be found within middens. They can be associated with carved or scarred trees and ceremonial sites. Burials are difficult to detect unless there are visible eroded evidence of a burial or human remains or they have been identified through historic records, or oral histories. The nature of soils and background review do not indicate that this type of site will be present in the project area.
Contact / Historical Sites	These types of sites are most likely to occur in locations of Aboriginal and settler interaction, such as on the edge of pastoral properties or towns. Artefacts located at such sites may involve the use of introduced materials such as glass or ceramics by Aboriginal people or be sites of Aboriginal occupation in the historical period. Contact sites are most often determined through community consultation. The background review does not indicate that this type of site will be present in the project area.

## 5.0 CULTURAL HERITAGE VALUES

The *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011) states that identification of archaeological values and assessment of significance must be supportable and the assessment criteria must reflect best practice assessment processes as set out in the Burra Charter

The Australia ICOMOS Burra Charter 2013 provides a best practice framework for the assessment, conservation and management of places of cultural significance. Cultural significance is defined in the Burra Charter as ‘a concept which helps in estimating the value of places’.

The Burra Charter defines ‘cultural significance’ very broadly to include ‘aesthetic, historical, scientific, social or spiritual value for past, present or future generations’.

Aboriginal cultural heritage sites can be assessed using these four principle values.

- Social / spiritual or cultural value (assessed only by Aboriginal people);
- Historical value;
- Scientific/archaeological value (assessed mostly by archaeologists/heritage consultants); and
- Aesthetic value.

### 5.1 DESCRIPTION OF HERITAGE VALUES

The following descriptions of cultural heritage values are drawn from OEH (2011) and *The Burra Charter*.

**Social / spiritual or cultural value** refers to the spiritual, traditional, historical or contemporary associations and attachments the place or area has for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them. This can include beliefs associated with religious or spiritual practices.

**Historic value** refers to the associations of a place with a historically important person, event, phase or activity in an Aboriginal community. Historic places do not always have physical evidence of their historical importance (such as structures, planted vegetation or landscape modifications). They may have ‘shared’ and ‘contested’ historic values with other (non-Aboriginal) communities and include places of post-contact Aboriginal history.

**Scientific (archaeological) value** refers to the importance of a landscape, area, place or object because of its rarity, representativeness and the extent to which it may contribute to further understanding and information.

**Aesthetic value** refers to the sensory, scenic, architectural and creative aspects of the place. It is often closely linked with the social values. It may consider form, scale, colour, texture and material of the fabric or landscape, and the smell and sounds associated with the place and its use.

Additionally, the assessment and justification in the statement of significance must discuss whether any value meets the following criteria (NSW Heritage Office 2001):

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

The *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011) also states that assessment of each of the criteria (above) should be graded in terms that allow the significance to be described and compared; for example, as high, moderate or low. In applying these criteria, consideration should also be given to:

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

There are currently no specific identified cultural heritage values for the project area. It is noted that in general, the landscape is significant to Aboriginal people.

## **6.0 PROPOSED DEVELOPMENT**

The following definitions of harm are reproduced from OEH (2011).

### **Direct harm/impact**

Direct harm may occur as the result of any activity which disturbs the ground including, but not limited to, excavation of soils, site preparation activities, installation of services and infrastructure, roadworks, excavating detention ponds and other drainage or flood mitigation measures, and changes in water flows affecting the value of a cultural site.

### **Indirect harm/impact**

Indirect harm may affect sites or features located immediately beyond, or within, the area of the proposed activity. Examples of indirect impacts include, but are not limited to, increased impact on art in a shelter site from increased visitation, vibration impacts to rock shelters from construction equipment, destruction from increased erosion and changes in access to wild food resources. (OEH 2011).

## **6.1 DESCRIPTION OF THE PROPOSED DEVELOPMENT**

The proposed Concept Plan for the redevelopment of Greenwich Hospital has been designed to increase the service potential and amenity of the site. The proposal seeks to replace existing hospital accommodation with a campus of:

- 150 place Hospital Health Care Facility with a mix of inpatient hospital beds, palliative care beds and aged care beds;
- Inpatient and outpatient support services and areas necessary to provide a modern, attractive health facility consistent with Hammond Care's high standard of care;
- 80 new seniors housing (apartments) addressing River Road;
- 9 new seniors housing (villas) addressing St Vincents Road;
- Pallister House will be retained and continue to fulfil its present functions; and
- Car parking generally in accordance with code requirements.

The demolition of existing buildings and structures on site (excluding Pallister House which will be retained in its current form) is required to accommodate the proposed redevelopment. Some tree removal will be also be required. Additional service infrastructure and water management will also require ground disturbance. Indirect impacts could include increased site use from additional residential development, particularly in the eastern, currently undeveloped, portion of the project area.

Plans of the existing site configuration and the proposed development are included in the ATR included in Appendix 1.

## **7.0 MANAGEMENT OF CULTURAL HERITAGE VALUES**

### **7.1 POTENTIAL HARM TO ABORIGINAL CULTURAL HERITAGE VALUES**

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#### **7.1.1 Impacts to Declared Aboriginal Places**

No Aboriginal Places have been declared within the project area.

#### **7.1.2 Previous AHIPs issued**

There have been no previous AHIPs issued for the project area.

### **7.2 IMPACT MITIGATION**

No Aboriginal objects have been recorded in the project area. No specific requirements for management of cultural heritage values have been provided by the RAPs. The archaeological assessment has concluded that there is some potential for unrecorded Aboriginal objects in a portion of the project area.

There is potential for rock overhangs, that could contain Aboriginal objects or potential archaeological deposit, in an area currently covered due to landscaping and vegetation. As development consent is being sought for Concept Plan approval, development impacts in the area of moderate archaeological potential can be minimised by design refinements, if required, at the subsequent detailed DA stage. It is proposed that when the full extent of development impact is known, any impacts to areas of archaeological potential or any Aboriginal objects that may be revealed within the rock overhangs be avoided by

minimisation of impact to the ground surface in flat areas and a management plan for the rock shelters.

RAPs have suggested that additional mitigation of impacts could be implemented through interpretation of cultural values within open space areas of the development

### **7.3 ECOLOGICALLY SUSTAINABLE DEVELOPMENT (ESD)**

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' (Commonwealth Department of the Environment and Energy website).

The two relevant principles of ESD for cultural heritage are the precautionary principle and inter-generational equity.

#### **7.3.1 Precautionary Principle**

As defined in Section 6 (2) of the *Protection of the Environment Administration Act 1991* (NSW) the precautionary principle states that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.

Although there is no certainty that impacts to Aboriginal objects will occur, the recommendations of this report have been designed using the precautionary principle.

Design refinements can be applied during DA stage including minor repositioning of building footprints; and/or a pier and beam structural system to avoid extensive excavation. This will reduce the likelihood of impact to Aboriginal objects. A management plan will enable avoidance of impacts to rock overhangs with potential to contain Aboriginal objects.

#### **7.3.2 Intergenerational Equity / Cumulative Impacts**

"How will future generations be able to visit, see, experience and/or research the Aboriginal objects?" (OEH)

The *Operational Policy: Protecting Aboriginal Cultural Heritage* (DECC, 2009) states in terms of Aboriginal heritage, intergenerational equity can be considered in terms of the cumulative impacts to Aboriginal objects and places in a region.

Although no Aboriginal objects are known to be present in the project area, the land would have been used by Aboriginal people in the past. The potential for interpretation of cultural values and past activity could be used to assist with intergenerational equity.

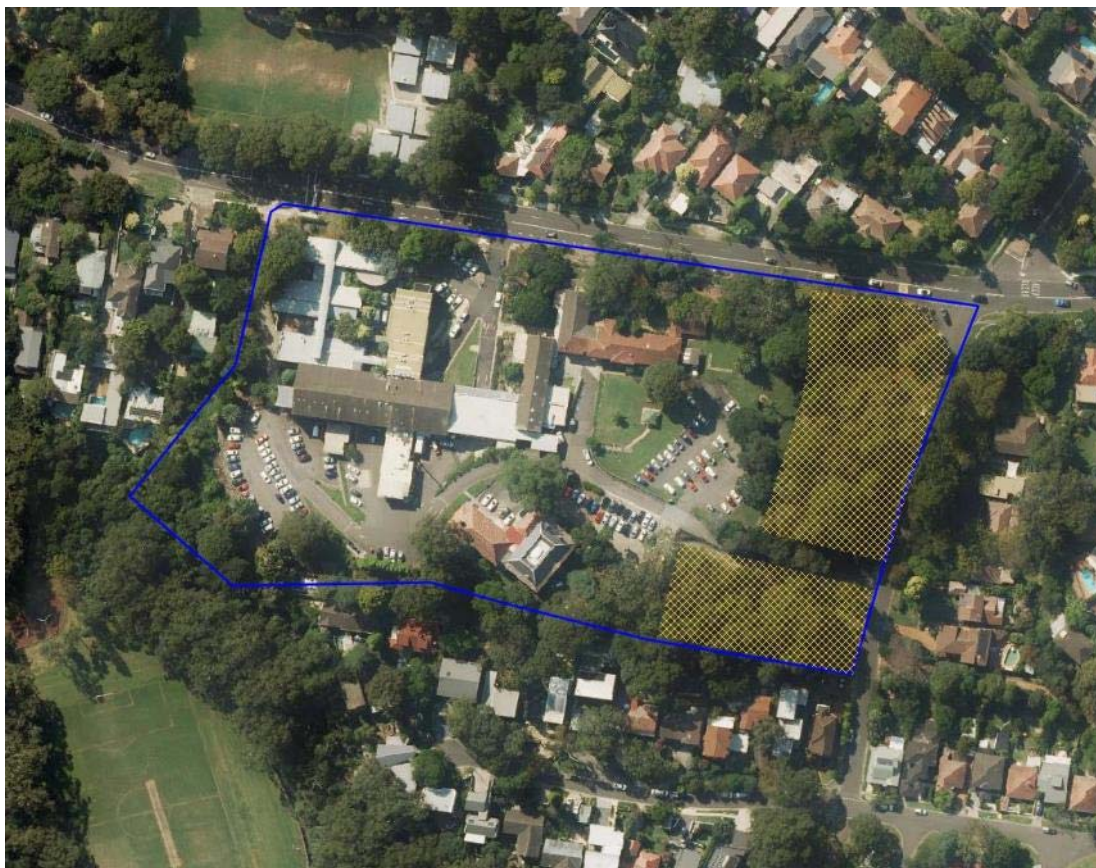
### **7.4 DISCUSSION & CONCLUSIONS**

The project area is sloping in nature and does not include a significant water source. Although Gore Creek is within 100 metres, the project area is elevated above the creek at the top of a steep slope. The project area is therefore unlikely to have been a favoured camping location. Some rock overhangs are located near the eastern perimeter facing St Vincent Street. These have some potential to contain evidence of past occupation.

The most likely location of sites in the locality is within shelters. The original landform steep slope with limited soil preservation is unlikely to have been conducive to preserving open sites, even prior to additional ground surface disturbance due to the site's development. The site has been developed since the late 1800s and was extensively rebuilt from the 1960s for its current use as a hospital. This development would likely have removed some if not all physical evidence of past Aboriginal occupation that may have previously been present.

One portion of the project area (shown in Figure 5) has some potential for Aboriginal objects within rock overhangs that are currently inaccessible. Visibility is low in this area.

**Figure 5: Area of moderate archaeological potential (orange shading)**



## 7.5 RECOMMENDATIONS

On the basis of the findings of the above assessment and the legislative framework for protecting and assessing Aboriginal archaeological sites in NSW, the following recommendations are provided:

- 1) In the parts of the project area assessed as having low archaeological potential and low potential to contain Aboriginal objects, it is recommended that there are no objections to the development on Aboriginal archaeological grounds.

- 2) In the area identified as having moderate potential to contain Aboriginal objects (Figure 5) impacts should be minimised.
  - a) If rock overhangs are uncovered / made accessible during landscaping works further archaeological inspection should be undertaken to determine whether Aboriginal objects are present. If necessary, a cultural heritage management plan should be put in place to prevent unforeseen indirect or direct impacts to Aboriginal objects.
  - b) As development consent is being sought for Concept Plan approval, development impacts in the area of moderate archaeological potential can be minimised by design refinements, if required, at the subsequent detailed DA stage. These design refinements could include minor repositioning of building footprints; and/or a pier and beam structural system to avoid extensive excavation. Many trees in the area will be retained and disturbance to ground surface area will be kept to a minimum. In light of this, the likelihood of impact to Aboriginal objects in this area is low. When the development footprint and construction methods are finalised, impacts should be managed via a construction management plan.
  - c) Consideration should be given to interpretation of cultural values to be incorporated in to the open space areas within the development.
- 3) A protocol should be put in place to deal with any unexpected Aboriginal objects that may be located during the course of the project. This should be included in the construction management plan or equivalent documentation. A draft protocol is presented below.
- 4) In the extremely unlikely event that suspected human remains are found the *Coroners Act 2009* requires that all work must cease, the site should be secured and the NSW Police and the NSW Coroner's Office should be notified. If the remains are found to be Aboriginal, OEH and the LALC should be contacted to assist in determining appropriate management.

### 7.5.1 Ongoing management to protect Aboriginal Objects

An AHIP is not required for SSD. Therefore, if Aboriginal objects were located during the project they could be managed according to the agreed protocol. The following is a suggested procedure to deal with unexpected finds during the life of the project.

- On-site employees or contractors involved in ground surface disturbance should be made aware of the statutory obligations that apply to the discovery of Aboriginal objects prior to the commencement of works.
- If a suspected Aboriginal object is located during construction, works should cease in the vicinity of the find and a fully qualified archaeologist with experience in archaeological excavation and identifying Aboriginal objects and should be called to site to determine the nature of the object.
  - If it is confirmed that it is an Aboriginal object and it is in an isolated context (i.e. it is not likely that *in situ* deposit or further items will be present), its location can be recorded and it can be removed and the works



continue. The RAPs should be contacted regarding appropriate long-term management of the object.

- If it is confirmed that it is an Aboriginal object and it is suspected that further material or in situ deposit could be present the RAPs should be contacted to determine an appropriate excavation strategy to salvage the in situ objects.
- Consideration should be given to relocating any Aboriginal objects removed from the site back into a secure place within the project area.
- If the item is found to not be an Aboriginal object, works may continue.

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## **APPENDIX 1: ARCHAEOLOGICAL TECHNICAL REPORT**

# **Greenwich Hospital, Aboriginal Archaeological Technical Report**

**By Vanessa Hardy  
December 2018**

**Report Prepared for  
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## EXECUTIVE SUMMARY

Cultural Heritage Connections Pty Ltd was commissioned by HammondCare in May 2018 to undertake an Aboriginal Cultural Heritage Assessment (ACHA) of a proposed redevelopment of Greenwich Hospital. Greenwich Hospital is located at 97 – 115 River Road, Greenwich, NSW. The proposed redevelopment has been designed to increase the service potential and amenity of the site.

The development application for the proposal is being assessed as a State Significant Development (SSD 8699). Secretary's Environmental Assessment Requirements for the project include a requirement to identify and describe the Aboriginal cultural heritage values that exist across the whole area that would be affected by the development.

This Archaeological Technical Report (ATR) forms part of the ACHA and has been compiled to meet the SEARs and with reference to:

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

No Aboriginal objects have been recorded within the project area. No declared Aboriginal Place is located within the project area. The project area has not been subject of any previous Aboriginal Heritage Impact Permit (AHIP). Archaeological assessment found that there is some archaeological potential within a small portion of the project impact area.

The project area has been cleared in the past. Current ground surfaces are a combination of artificial hard surface, landscaped garden and some grassed areas. Introduced fill is present.

On the basis of the findings of the assessment the following recommendations are provided:

- 1) In the parts of the project area assessed as having low archaeological potential and low potential to contain Aboriginal objects, it is recommended that there are no objections to the development on Aboriginal archaeological grounds.
- 2) In the area identified as having moderate potential to contain Aboriginal objects (Figure 8) impacts should be minimised.
  - a) If rock overhangs are uncovered / made accessible during landscaping works further archaeological inspection should be undertaken to determine whether Aboriginal objects are present. If necessary, a cultural heritage management plan should be put in place to prevent unforeseen indirect or direct impacts to Aboriginal objects.
  - b) As development consent is being sought for Concept Plan approval, development impacts in the area of moderate archaeological potential can be minimised by design refinements, if required, at the subsequent detailed DA stage. These design refinements could include minor repositioning of building footprints; and/or a



- a) If rock overhangs are uncovered / made accessible during landscaping works further archaeological inspection should be undertaken to determine whether Aboriginal objects are present. If necessary, a cultural heritage management plan should be put in place to prevent unforeseen indirect or direct impacts to Aboriginal objects.
  - b) As development consent is being sought for Concept Plan approval, development impacts in the area of moderate archaeological potential can be minimised by design refinements, if required, at the subsequent detailed DA stage. These design refinements could include minor repositioning of building footprints; and/or a pier and beam structural system to avoid extensive excavation. Many trees in the area will be retained and disturbance to ground surface area will be kept to a minimum. In light of this, the likelihood of impact to Aboriginal objects in this area is low. When the development footprint and construction methods are finalised, impacts should be managed via a construction management plan.
  - c) Consideration should be given to interpretation of cultural values to be incorporated in to the open space areas within the development.
- 3) A protocol should be put in place to deal with any unexpected Aboriginal objects that may be located during the course of the project. This should be included in the construction management plan or equivalent documentation. A draft protocol is presented below.
  - 4) In the extremely unlikely event that suspected human remains are found the *Coroners Act 2009* requires that all work must cease, the site should be secured and the NSW Police and the NSW Coroner's Office should be notified. If the remains are found to be Aboriginal, OEH and the LALC should be contacted to assist in determining appropriate management.

## Ongoing management to protect Aboriginal Objects

An AHIP is not required for SSD. Therefore, if Aboriginal objects were located during the project they could be managed according to the agreed protocol. The following is a suggested procedure to deal with unexpected finds during the life of the project.

- On-site employees or contractors involved in ground surface disturbance should be made aware of the statutory obligations that apply to the discovery of Aboriginal objects prior to the commencement of works.
- If a suspected Aboriginal object is located during construction, works should cease in the vicinity of the find and a fully qualified archaeologist with experience in archaeological excavation and identifying Aboriginal objects and should be called to site to determine the nature of the object.
  - If it is confirmed that it is an Aboriginal object and it is in an isolated context (i.e. it is not likely that *in situ* deposit or further items will be present), its location can be recorded and it can be removed and the works continue. The RAPs should be contacted regarding appropriate long-term management of the object.

## 1.0 INTRODUCTION

Cultural Heritage Connections Pty Ltd was commissioned by HammondCare in May 2018 to undertake an Aboriginal Cultural Heritage Assessment (ACHA), including an Archaeological Technical Report (ATR) of a proposed upgrade of Greenwich Hospital.

### 1.1 PROJECT AREA & PROJECT CONTEXT

Greenwich Hospital is located at 97 – 115 River Road, Greenwich, also known as Lot 3 and Lot 4 DP 584287. The subject site is zoned SP2 Infrastructure (Health Service Facilities) under Lane Cove Local Environmental Plan 2009 (LEP).

The site is roughly rectangular in shape and incorporates an area of approximately 3.4 hectares. The site has road frontages to River Road and St Vincent's Road. An internal road network provides vehicular access across the site.

The location of the project area is shown in Figure 1.

Greenwich Hospital has operated from the site since 1966. HammondCare has owned and operated Greenwich Hospital since 2008. Lot 3 DP 584287 contains the existing Greenwich hospital, associated inpatient and outpatient facilities, car parking and service areas. Existing buildings range between 1 and 5 storeys in height and are interconnected through internal corridors and external pathways. The site is serviced by water, sewer, telecommunication and power services.

The existing buildings and associated facilities are shown in Figure 2. The L-shape heritage curtilage is legally known as Lot 4 DP 584287 and contains the two-storey late Victorian house known as 'Pallister' and grounds. 'Pallister' is listed as state heritage item (SHR 00574). The components of the curtilage area that contribute to the significance of Pallister House are:

- Pallister the two-storey late Victorian house;
- Tear-drop shaped carriage loop;
- Mature fig tree; and
- Bridle path from the corner of River Road and St Vincent's Road towards 'Pallister'.

No demolition, alterations or additions are proposed to Pallister.

The proposed redevelopment of Greenwich Hospital has been designed to increase the service potential and amenity of the site. The proposal seeks to replace existing hospital accommodation with the following:

- 150 place Hospital Health Care Facility with a mix of inpatient hospital beds, palliative care beds and aged care beds ;
- Inpatient and outpatient support services and areas necessary to provide a modern, attractive health facility consistent with Hammond Care's high standard of care;
- 80 new seniors housing (apartments) addressing River Road;
- 9 new seniors housing (villas) addressing St Vincents Road;

- Pallister House will be retained and continue to fulfil its present functions; and
- Car parking generally in accordance with code requirements.

The development application for the proposal is being assessed as a State Significant Development (SSD 8699). For an SSD where Aboriginal objects will be subject to impact, there is no requirement for an Aboriginal heritage impact permit under section 90 of the *National Parks and Wildlife Act 1974*. Instead, Secretary's Environmental Assessment Requirements (SEARs) are developed according to guide the preparation of an Environmental Impact Statement (EIS) for approval by Department of Planning (DoP).

Key Issue number 11 the SEARs for the Greenwich Hospital redevelopment states:

- Where relevant, address Aboriginal Cultural Heritage in accordance with the *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011) and *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

No Aboriginal objects have been previously recorded within the project area boundaries. A due diligence assessment for the current project was undertaken by GML Heritage (2018). The assessment found that the project area had some potential to contain Aboriginal objects, and additional assessment was recommended. The scope of the assessment did not include Aboriginal cultural values of the project area.

This report has been produced in accordance with the following OEH guidelines:

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





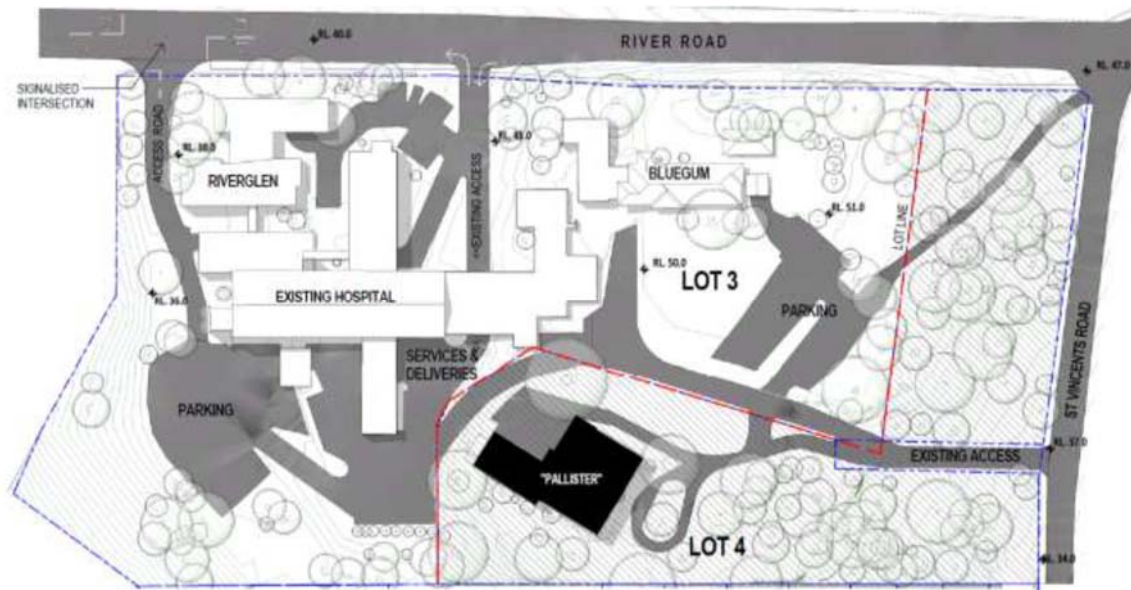
0 0.5 1 1.5 km

**Figure 1: Project area location**

Maps and figures in this document may be based on third party data, may not be to scale and are intended as a guide only. We do not warrant the accuracy of such maps or figures.



**Figure 2: Existing site layout**



## 1.2 LIMITATIONS AND AUTHORSHIP

No assessment of non-Aboriginal archaeological potential has been undertaken. Analysis of the archaeological background, design of the methodology, field inspection and reporting for the assessment was undertaken by Vanessa Hardy (BA Hons), archaeologist and Director of Cultural Heritage Connections Pty Ltd.

## 1.3 REPORT OUTLINE

The following section (Section 2.0) provides detail on the legislative context for the project. Section 3.0 of this report provides a summary of the environmental context of the project area. Section 4.0 examines the archaeological background and Section 5.0 presents the results of the site inspection and RAP meeting. Section 6.0 considers the impacts of the proposed activity, while Section 7.0 provides a discussion and presents recommendations arising from the archaeological assessment.

## 2.0 LEGISLATIVE CONTEXT

This section outlines the legislative framework protecting archaeological heritage sites in NSW. It does not purport to be legal advice. It presents an interpretation of the implications for the management of archaeological sites within NSW and the study area as understood by the consultant. The Crown Land status of the study area may affect the applicability of the legislation.

As discussed above, the EP&A Act is applied to projects deemed to be SSD. In these cases, permits under Section 90 of the *National Parks and Wildlife Act 1974*. Instead, Secretary's Environmental Assessment Requirements (SEARs) are provided to guide the preparation of an Environmental Impact Statement (EIS). The SEARs are generally intended to produce an assessment to the same standards as non SSD projects. The information below relates to the general legislative requirements for Aboriginal heritage in NSW.

### 2.1.1 Environmental Planning and Assessment Act 1979

The *EP&A Act* requires that environmental impacts are considered in land use planning and decision-making. The definition of 'environmental impacts' includes impacts on the cultural heritage of the project area. The Act sets out specific statutory assessment processes including:

- Part 4: Development that requires consent under consideration of environmental planning instruments.
- Part 5: An assessment process for activities undertaken by public authorities and for developments that do not require a development consent but an approval under another mechanism.

### 2.1.2 National Parks and Wildlife Act 1974 (amended 2010)

The *National Parks and Wildlife Act 1974* (NPW Act) protects Aboriginal objects and Aboriginal places in NSW. It has been amended by the National Parks and Wildlife Regulation 2009 (NPW Regulation). Under the NPW Act, the following are offences unless an exemption or defence is provided for under the Act:

- A person must not knowingly harm or desecrate an Aboriginal object (knowing offence)
- A person must not harm or desecrate an Aboriginal object or Aboriginal place (strict liability offence)

The maximum penalty for the knowing offence is \$550,000 or \$275,000 (depending on whether there are aggravating circumstances) and 1 or 2 years' goal for an individual. For a corporation the maximum penalty for the knowing offence is \$1.1 million. The maximum penalty for the strict liability offence is \$110,000 or \$55,000 (depending on whether there are aggravating circumstances) for an individual or \$220,000 for a corporation.

Harm includes acts or omissions that “destroy, deface or damage” an Aboriginal object or Aboriginal Place, and in relation to an object, move the object from the land on which it has been situated. Harm does not include something that is trivial or negligible.

Section 91 of the Act also obliges any person who discovers an Aboriginal object to report it to the OEH for it to be entered on the AHIMS.

An Aboriginal object is defined as:

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

An Aboriginal object is legally protected irrespective of land tenure, the significance of the object and whether or not it has been recorded.

“Aboriginal Places” are places so declared under Section 84 of the Act.

Anyone who exercises due diligence in determining that their actions will not harm Aboriginal objects has a defence against prosecution for the strict liability offence if they later harm an object. Due diligence can be exercised by complying with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010c) (or industry-specific codes of practice) that has been adopted under the National Parks and Wildlife Regulation 2009. The code provides a process to enable a reasonable determination of whether or not Aboriginal objects will be harmed by an activity or whether further investigation or an Aboriginal Heritage Impact Permit (AHIP) are required.

There is also a range of defined exemptions and low impact activities defined in the Regulation for which due diligence is not required. These include undertaking specified farming, land management, maintenance, surveying or environmental rehabilitation works.

*Clause 80B Defence of carrying out certain low impact activities: section 87 (4)*

*(1) It is a defence to a prosecution for an offence under section 86 (2) of the Act, if the defendant establishes that the act or omission concerned:*

*(a) was maintenance work of the following kind on land that has been disturbed:*

*(i) maintenance of existing roads, fire and other trails and tracks,*

Under the amended Act a permit is no longer required to *look for* Aboriginal objects providing the investigation is undertaken in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b). Archaeological test excavations that follow the code do not require an AHIP. If objects are present and harm cannot be avoided it is necessary to apply for an AHIP.

There are also requirements for consultation with Aboriginal people relating to AHIP applications. These are set out in the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010a).



## **Lane Cove LEP 2009**

Part 5 Clause 5.10 of the Lane Cove LEP includes the following provisions for Aboriginal Heritage:

### **(1) Objectives**

The objectives of this clause are as follows:

- (a) to conserve the environmental heritage of Lane Cove,
- (b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,
- (c) to conserve archaeological sites,
- (d) to conserve Aboriginal objects and Aboriginal places of heritage significance.

### **(2) Requirement for consent**

Development consent is required for any of the following:

- (a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):
  - (i) a heritage item,
  - (ii) an Aboriginal object,
  - (iii) a building, work, relic or tree within a heritage conservation area,
- (b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,
- (c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,
- (d) disturbing or excavating an Aboriginal place of heritage significance,
- (e) erecting a building on land:
  - (i) on which a heritage item is located or that is within a heritage conservation area, or
  - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,
- (f) subdividing land:
  - (i) on which a heritage item is located or that is within a heritage conservation area, or
  - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.

### **(3) When consent not required**

However, development consent under this clause is not required if:

(a) the applicant has notified the consent authority of the proposed development and the consent authority has advised the applicant in writing before any work is carried out that it is satisfied that the proposed development:

(i) is of a minor nature or is for the maintenance of the heritage item, Aboriginal object, Aboriginal place of heritage significance or archaeological site or a building, work, relic, tree or place within the heritage conservation area, and

(ii) would not adversely affect the heritage significance of the heritage item, Aboriginal object, Aboriginal place, archaeological site or heritage conservation area, or

(b) the development is in a cemetery or burial ground and the proposed development:

(i) is the creation of a new grave or monument, or excavation or disturbance of land for the purpose of conserving or repairing monuments or grave markers, and

(ii) would not cause disturbance to human remains, relics, Aboriginal objects in the form of grave goods, or to an Aboriginal place of heritage significance, or

(c) the development is limited to the removal of a tree or other vegetation that the Council is satisfied is a risk to human life or property, or

(d) the development is exempt development.

### **(4) Effect of proposed development on heritage significance**

The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation management plan is submitted under subclause (6).

### **(5) Heritage assessment**

The consent authority may, before granting consent to any development:

(a) on land on which a heritage item is located, or

(b) on land that is within a heritage conservation area, or

(c) on land that is within the vicinity of land referred to in paragraph (a) or (b),

require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.

### **(8) Aboriginal places of heritage significance**

The consent authority must, before granting consent under this clause to the carrying out of development in an Aboriginal place of heritage significance:

(a) consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place by

means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement), and

(b) notify the local Aboriginal communities, in writing or in such other manner as may be appropriate, about the application and take into consideration any response received within 28 days after the notice is sent.

## **3.0 ENVIRONMENTAL CONTEXT**

Analysis of the environmental context is essential for developing accurate models of cultural activity, site distribution patterns and the archaeological potential of any given area. Environmental characteristics influence the types of archaeological sites. An understanding of how the landscape looked and behaved in the past can help us to predict where Aboriginal people may have undertaken various activities and therefore the types of archaeological sites that may be found in the present. In addition, environmental processes influence the preservation of sites. Heavy erosion or acidic soils are likely to destroy or damage certain types of evidence, reducing the likelihood of locating evidence of past occupation. Certain environmental aspects may also have significance for Aboriginal people both in the past and in the present.

The study area is located within the Sydney Basin. Its environmental setting is discussed below.

### **3.1 GEOLOGY & LANDSCAPE**

The study area is within the Harbour Foreshores physiographic region of the Sydney Basin, south of the Hornsby Plateau (Chapman and Murphy 1989). The Sydney Basin is underlain by Triassic sediments, which dip gently from the east and north towards a central lowland situated south-west of Parramatta. As the basin rises to the north it is transacted by the drowned river valleys of the Parramatta and Georges Rivers. The action of these rivers has exposed the underlying Hawkesbury Sandstone and produced the 'rugged to undulating' valleys of the Harbour Foreshores physiographic region (Chapman and Murphy 1989).

Stone suitable for tool manufacture occurs across the Sydney Basin. Recorded artefacts have been made from silcrete, chert, 'indurated mudstone'/'silicified tuff', quartz, quartzite and basalt. Many of these materials can be commonly found as cobbles or boulders eroding out of deposits near creek lines.

The project area is located on an upper slope landform near a locally elevated crest. The topography of the site rises towards the centre from the south-eastern and south-western property boundaries, with the south-western part of the site falling steeply away towards Gore Creek.

Availability of water is a critical factor for occupation for Aboriginal people as it not only sustains their families and groups but also attracts flora and fauna that are important food, medicinal and shelter resources. Where permanent water is located through fresh water springs and higher stream order watercourses, for example, third, fourth and fifth order streams and confluences (following Strahler (1952)), larger Aboriginal camp sites or areas of repeated visits/camping are more likely to be identified. The survival of such sites is dependent on the impacts of subsequent land use and erosion.

There are no permanent water sources within the project area. There may have been minor drainage lines, although the extent of development makes these hard to reconstruct. The closest reliable water source is Gore Creek, approximately 60 metres to the southwest. There is a steep drop to the creek at this location where it is approximately 500-600 metres from its confluence with the Lane Cove River. Part of the creek has been infilled for sporting grounds. Prior to infilling, the creek would have been a wide estuary

at this location. It is likely that the proximity of the varied resource zones of freshwater and the nearby tidal section of the Lane Cover River would have been attractive to the past inhabitants.

### **3.2 SOILS**

Soil landscapes are a division of soils that have common soil attributes and landform features. The project area is mapped as partly within the Gymea erosional soil landscape and partly within the Hawkesbury colluvial soil landscape (Chapman, et al. 1989).

The Gymea soil landscape is common along the Harbour foreshores as well as the Lane Cove, Parramatta and Georges Rivers. It is based on a Hawkesbury Sandstone geology. The landscape of this soil type is typically undulating to rolling low hills. Slopes range from 10 to 25% with local relief of 20-80 metres. The sideslopes include varying width sandstone benches (10-100 metres) often forming broken scarps (Chapman and Murphy 1989). In this locality the Gymea landscape sits in the elevated areas/ridges above the Hawkesbury colluvial soil landscape of the waters edges of the Lane Cove and Parramatta Rivers.

Topsoil (A1 horizon) of the Gymea Landscape is a loose, coarse loamy sand to sandy loam, porous with an apedal single grained structure. Its colour can range from brownish-black where high levels of organic matter are present to a bleached dull yellow-orange. Its pH ranges from slightly to strongly acidic. Sandstone and ironstone inclusions are common. Where erosion has occurred underlying clayey sands and sandy clay subsoils can be exposed. Bedrock may also be exposed.

On crests up to 30 centimetres of A Horizon generally overlies bedrock or B Horizon soils. Sideslope soils are discontinuous and rock outcrop may be present. Up to 30 centimetres of A Horizon is commonly present on the inside and outside of benches (Chapman and Murphy 1989).

The Hawkesbury soil landscape is rugged, rolling to very steep hills with local relief of 40-200 metres. Slopes are generally greater than 25% and up to 70% with over 50% rock outcrop at the surface. Valleys are narrow and incised. Dominant soils are a loose coarse quartz sand (sand to sandy loam) occurring as a topsoil and a clayey sand to sandy clay loam B or C horizon in association with sandstone bedrock. Topsoils are typically varied from a dull yellow orange to a brownish black where organic matter is present becoming lighter at depth. Subsoils are often yellowish with gravel, stone and ironstone-plated sandstone fragments common. The soils are shallow (<50cm) and discontinuous. They are susceptible to sheet erosion, particularly after fire (Chapman and Murphy 1989). Neither soil types are ideal for preserving in situ occupation deposit.

### **3.3 FLORA AND FAUNA**

The project area has been cleared since European settlement. On-site vegetation includes a mix of exotic species and remnant vegetation. In the past, the area would have provided a wide variety of flora and fauna resources for the Aboriginal communities who lived there. The vegetation communities of the greater Sydney area have over 200 species with edible parts (Attenbrow 2002). Many plants were exploited as a minor food resource, for example berries or plant nectars. Wood was used to make canoe poles, weapons, woomeras, boomerangs and was used for firewood. Plant resins were used to fix parts of

tools together. Bark was used for huts, carrying vessels, canoes, shields, fishing lines, bedding, blankets and torches, amongst other things (Attenbrow 2002: 113). Fibres were used to make ropes that could then be used in traps and nets for trapping animals, birds and fish. *Casuarina* species were used for bark for canoes, *Xanthorrhoea* were used for spear shafts and the nectar was also eaten (Gunn 1992). Local knowledge of medicine plants was also an important part of Aboriginal culture.

In the study area vicinity, the higher ridgelines would have contained heaths and woodland (dry sclerophyll) including species such as red bloodwood (*Eucalyptus gummifera*), yellow bloodwood (*E. eximia*), scribbly gum (*E. haemastoma*), brown stringybark (*E. capitellata*) and old man banksia (*Banksia serrata*). As well as *Banksia*, understory shrub species would have included *Grevillia*, *Hakea*, *Acacia*, *Leptospermum* and *Boronia*. In the slopes to the River taller woodland or open-forest would have occurred with main tree species including Sydney peppermint (*E. piperita*) and smooth-barked apple (*Angophora costata*) (Chapman and Murphy 1989; Benson and Howell 1990). Blue Gum high forest was also known to be present in the shale capped pockets of the local area. The trees of the Blue Gum high forest were highly prized for their timber and were extensively cleared early in the colonial occupation of Sydney (Benson and Howell 1990: 114).

Aboriginal firing of the landscape may have resulted in opening up of grasslands in the valleys and ridge tops, which, in turn, increased the habitat for large macropods. Most Australian land mammals are available all year around as they are not migratory; however, some may be easier to catch at certain times, for example possums are less active in the winter months. Possums are frequently referred to as part of the diet of Aboriginal people in Sydney. It was thought that a marked difference would be found between the inland and coastal diet of groups in the Sydney area, due to the coastal availability of fish and shellfish. However, many of the same animal species are found in bone remains excavated at archaeological sites. In general, macropods are common and would have formed an important part of the diet (Attenbrow 2002: 71). Water based plants, birds and animals would also have been exploited in the local area particularly because of the proximity of the coastal lagoons.

Overall, the resources available to inhabitants of the study area region could have provided a varied and generally reliable resource to sustain the many economic and social requirements of large Aboriginal groups.

### 3.4 LAND USE HISTORY

The existing hospital footprint has been largely disturbed from past construction and consists predominantly of manicured lawns and garden plantings. Cut and fill has taken place to create level services. The perimeter of the site is characterised by remnant vegetation that contributes to the character of the site and provides a visual buffer from surrounding areas.

The history of post-contact development of the project area is detailed in the historic archaeological assessment (GML Heritage 2018). The following is a brief summary of the information contained in that report relevant to understanding development impacts.

The assessment identified four phases of development at the site:

1. Early land grants and land ownership (1788-1882)
2. Gentlemen's estate, Pallister House (1883-1937)

3. Girls' school (1937-1946)
4. Pallister Girls' Home and Greenwich Hospital and Pallister (1946- present)

The project area appears to have been undeveloped prior to 1883 when it was purchased by John St Vincent Welch. After initial clearing and landscaping the house now known as 'Pallister' was built in 1892. Various other additions were made to the grounds during the time it remained a private residence, including: tennis courts, a swimming pool, driveway/access road, and various out buildings such as staff quarters and stables/garages. In 1937 the property was purchased by Sydney Church of England Girls' Grammar School. During this time additional sporting facilities were added and some additions to buildings occurred along with a realignment of the previous driveway. It appears that the school only remained on site until 1942 and that it was subsequently used as a Girls' home from 1943. There are no records of major additions during its use as a home. Apart from Pallister house most of the elements still on site date from the period of use as Greenwich Hospital (since 1966). The main hospital buildings and associated administration and accommodation were built in this time. additional landscaping and service installation would also have taken place further reducing the potential for Aboriginal objects to be preserved. Figure 3 and Figure 4 show the 1943 and present layout of the site respectively.

The extent of ground surface disturbance is a major factor in determining whether physical evidence of past Aboriginal occupation of an area will be present. In general, past activities provide an indication of the level of disturbance and correlate to archaeological potential. Table 1 provides a key to levels of disturbance and the likely archaeological potential.

**Table 1: Levels of past land disturbance**

Disturbance Level	Types of Past Activities	Examples in Study Area
<b>HIGH</b> Severe soil disturbance little potential for survival of intact archaeological deposits, displaced objects rarely still occur.	Construction of buildings, graded roads (depending on depth of soils), service trenches for sewers etc., dams, high erosion, intensive and/or repeated landscaping or cultivation.	Hospital buildings and landscaped areas, access roads and services.
<b>MODERATE</b> Some disturbance to soils with some potential for intact archaeological deposits and/or potential for displaced Aboriginal objects.	Clearing or partial clearing, stock activity, light cultivation or ploughing, low erosion.	The eastern portion of Lot 4 DP 584287. This land has been partially cleared and is likely to have been subject to some erosion. However, there is no construction in this area and some potential for intact deposit within rock overhangs.
<b>LOW</b> Partially cleared or grazed, not subject to intensive soil disturbance or erosion therefore retaining potential for intact deposit and objects.	Non-mechanical clearing, stock grazing, either a depositional soil environment or minimal erosion.	Due to erosion it is unlikely that there are areas of low disturbance in the project area.



**Figure 3: 1943 aerial photograph of the project area and surrounds (Source: <https://maps.six.nsw.gov.au/>)**



**Figure 4: Aerial photo of the project area (Source: <https://maps.six.nsw.gov.au/>)**



## 4.0 ARCHAEOLOGICAL CONTEXT

For the purposes of determining settlement and site location patterns, archaeologists examine regional and local trends in the distribution of known sites in relation to environment and topography. This information can be used to provide a picture of behaviour in the past as well as indicate how evidence of that past behaviour might be preserved in the archaeological record. The following provides an overview of relevant regional and local archaeological evidence.

### 4.1 REGIONAL PREDICTIVE MODELLING

Timing of the Aboriginal occupation of the Sydney region has been subject of some research. An early date (41,700  $\pm$  3000/-2000 BP (years before present)) was taken from artefacts found in gravels of the Cranebrook Terrace on the Nepean River (Stockton and Holland 1974), however there is some disputes over the actual age of the deposits.

A site (RTA-G1) excavated by McDonald (2005) from the Parramatta Sand Sheet in the city centre of Parramatta has been dated to 30,735  $\pm$  407 BP. This date is considered more reliable. A rock shelter site north of Penrith on the Nepean, known as Shaws Creek K2, is another Pleistocene dated site, dated to 14,700  $\pm$  250 BP (Attenbrow 2010:18). More recently, a salvage excavation at Pitt Town on the banks of the Hawkesbury River has the lowest deposits containing artefacts dated to 15,000 BP (Williams, et al. 2012: 95).

The evidence of site dates demonstrates that Aboriginal people have inhabited the greater Sydney region for many thousands of years. In light of this it is expected that a range of evidence of that past habitation may be present. Much of the archaeological work done in the Sydney Basin has been focused on the Cumberland Lowlands. Less is known about the Harbour Foreshores specifically, although many of the findings will have general applicability. Despite extensive development across Sydney, resulting in the destruction of archaeological evidence, many hundreds of sites have been recorded.

The most common site types are rock shelters with midden deposit, rock shelters with art, rock art petroglyphs (often referred to as 'rock engravings') and open artefact scatters. These four site types have a frequency between the 15-20% of known sites. Less frequently recorded site types (5-15% frequency) include rock shelters with artefacts, grinding grooves and open middens (Wheeler 2004). Many of these site types are largely dependent on environmental factors for their occurrence. In areas where sandstone rock overhangs are present sites are commonly located within the overhangs and other sites such as middens, where shellfish are processed and discarded occur along waterways.

Open artefact scatters can range from a few discarded stone pieces (resulting from a one-off use of an area) to large sites which may have been visited by a large number of people and/or been repeatedly used over many years. In these larger sites, distinct areas relating to specific activities can sometimes be located, such as knapping floors where individuals would have sat to manufacture stone tools. Sites can also include other habitation remains such as animal bone, shell or fireplaces (known as hearths).

Rock shelter sites are the most common site type in the Harbour Foreshores region (Attenbrow 2002: 49). This is probably partly due to the greater preservation of material in a shelter context as well as the fact that many sandstone outcrop areas are in steep terrain that has remained undeveloped. Over a decade ago there were at least 840 rock

platform sites and 875 rock shelter sites recorded across the greater Sydney area (Attenbrow 2002).

During the many thousands of years of Aboriginal occupation of the Sydney Basin numerous changes have occurred to climate and resources. Inevitably social alliances, groupings and occupation patterns would have also changed. Due to the differences in resources available for coastal and inland areas, it has been frequently assumed that hinterland and coastal groups had very different lifestyles; in summary, coastal people were 'fishers' and inland people were 'hunters'. This has not always been supported by evidence from archaeological excavations that suggests that coastal people also exploited a wide range of terrestrial resources and hinterland people had a variety of riverine resources available for use.

A desktop and field assessment for the Cumberland Plain North West Growth Centres water infrastructure (AHMS 2011) found a total of 208 sites within the study area, which were used to test a detailed predictive model. The evaluation of the predictive model used concluded that the model was "between 67 and 72 % (average = 69.5%) effective at predicting archaeological materials, and between 67 and 83% (average = 75%) effective at capturing sites of high or very high archaeological significance" within the desktop assessment area (AHMS 2011: 59).

One of the failings of the model, according to the authors, was that it over predicted the presence and survival of Aboriginal objects. This was largely due to the fact that detailed land disturbance data was not available for much of the area. Therefore, some of the areas predicted to contain Aboriginal objects would be found to be unlikely to preserve archaeological deposit in light of the extent of ground surface disturbance due to past land use. This suggests that the extent of land disturbance is an important factor in assessing the likelihood of Aboriginal objects occurring in a given area.

In addition, the study highlighted the following key findings:

- The majority of recorded sites are artefact sites (either isolated finds or artefact scatters.
- Stream order is of primary importance in determining the distribution frequency and scale (extent, artefact densities and complexity) of sites.
- Low density artefact sites have been identified within all landform types near lower order streams. The landforms include floodplains, creek banks, elevated spurs, lower slopes, mid slopes and upper slopes. The sites demonstrate evidence of short term or transient use and ephemeral occupation.
- Higher density artefact sites and those which demonstrate a variety of tool types, frequent or repeated occupation and use, and complex assemblages occur most frequently on lower slopes, floodplains and ridges near high order streams.
- Proximity to raw material sources is a key factor in site distribution. Natural rock outcroppings and/or Aboriginal stone tool quarries (rather than local river or creek gravels) are the preferred source of raw materials for artefact production.
- Areas of historical and/or modern disturbance (such as buildings, roads, services, market gardens etc) severely compromise Aboriginal archaeological preservation and survival. Accordingly, where this type of disturbance is high,

intact archaeological material is considered less likely to occur (AHMS 2011: 52-53).

The site distribution patterns observed for the Harbour Foreshores suggest that shelter sites are more common than open sites. This is likely to be a combination of the fact that activities were focused within the protection of shelters, but also that these areas are generally better preserved/less developed. Shelters not only contain artefact sites but also art. It is likely that large well protected shelters with a good aspect were used repeatedly over time.

Within the sandstone landscapes, open artefacts sites are rarer than on the Cumberland Plain, and most likely to be located close to water. Grinding grooves can occur on flat sandstone surfaces near water.

## 4.2 LOCAL CONTEXT

The *Port Jackson Archaeological Project* was undertaken in the early to mid 1990s partly because it was recognised that the archaeology of Port Jackson and surrounds was comparatively poorly documented (Attenbrow 1990). This is, to a large extent still the case compared to the extensive amount of work that has been carried out on the adjacent Cumberland Plain. Relatively few excavations have been undertaken in the sandstone geology of Sydney Harbour and its associated rivers. In general terms more sites have been recorded on sandstone geology than shale (Irish 2002: 21-22).

Attenbrow notes that the physical evidence of the activities of the Aboriginal inhabitants was noted by the early non-indigenous settlers. Governor Phillip commented on the observations of rock engravings by exploration parties with the First Fleet and also ordered that the burial mounds along Middle Harbour be investigated (Attenbrow 1990: 1).

The Port Jackson project investigated the distribution of shell middens throughout 8 'sub catchments' including the Lane Cove River. It was concluded that 98% of middens are on Hawkesbury sandstone geology. Most of the known sites occur on Council reserves or Crown Lands with only 8% on private or 'non-reserve' land. The highest density of sites was recorded in Middle Harbour. Over half (61%) of the midden sites and 80% of the archaeological deposits were located within rock shelters with over half of all sites occurring within ten metres of the high-water level. It was also acknowledged that some of these patterns might be due to the relative level of development on ridgelines as opposed to adjacent to the waterfront (Attenbrow 2002).

A landscape such as the project area would have provided access to a number of different resource zones; making it an attractive location for past occupation.

A due diligence assessment was undertaken for the Greenwich Hospital redevelopment by GML Heritage (2018). The assessment identified areas in the south and east of the project area as having some potential to contain Aboriginal objects. This included the area of steep slope in the southwestern corner of the project area and the car park areas in the site's eastern third. These predictions are discussed further in Section 5.0.

The following table (Table 2), provides a description of site types associated with past Aboriginal occupation as well as an indication of the likelihood of each type occurring in the project area.

**Table 2: Site type definitions**

Site Type	Description
Open Camp Sites/Stone Artefact Scatters/Isolated Finds	<p>Open camp sites represent past Aboriginal subsistence and stone knapping activities, and can include archaeological remains such as stone artefacts and hearths. This site type can be revealed as surface scatters of stone artefacts in areas where vegetation is limited and ground surface visibility increases. Such scatters of artefacts can also be exposed by erosion, land use such as ploughing, and the creation of informal, unsealed vehicle access tracks and walking paths.</p> <p>Sites are often located on dry, relatively flat land along or adjacent to a water source. Sites containing surface or subsurface deposit from repeated or continued occupation are more likely to occur on elevated ground near the most permanent, reliable water sources.</p> <p>Isolated finds may represent a single item discard event, be the result of limited stone knapping activity, or be an artefact that has been displaced from its original location due to erosion or other disturbance. The presence of such isolated artefacts can also indicate the presence of in situ buried archaeological deposit, or additional artefacts obscured by low ground visibility. Isolated artefacts can be located on all landforms associated with past Aboriginal activities.</p> <p>This site type is the most common on the Cumberland Plain. Open sites are less likely to occur in sandstone geology. Due to the amount of development and erosion in the project area there is a low potential for this site type.</p>
Scarred or Carved Trees	<p>These sites are trees with scars and/or carved patterns which can be attributed to Aboriginal cultural origin. Tree bark was utilised by Aboriginal people for various purposes, including the construction of shelters (huts), canoes, paddles, shields, baskets and bowls, fishing lines, cloaks, torches and bedding, as well as being beaten into fibre for string bags or ornaments. The removal of bark exposes the heart wood of the tree, resulting in a scar. Trees may also have been scarred in order to gain access to food resources (e.g. cutting toe-holds so as to climb the tree and catch possums or birds), or to mark locations such as tribal territories.</p> <p>Carved trees contain carved patterns on the tree trunk and are often found in association with ceremonial grounds, burials or cultural sites. If trees of sufficient age are present within the project area, there is some potential for this site type.</p>
Grinding Grooves	<p>Aboriginal grinding grooves are grooves where Aboriginal people have sharpened or manufactured stone axes and other implements and in some cases, ground seed and grains in the sandstone forming 'bowls'. These sites are most often found in sandstone. This site type can occur where suitable geology is present. Although the project area does contain such geology, there does not appear to be a water source that would have been required for this site type to occur. This and the extent of disturbance make grinding grooves unlikely to occur.</p>
Rock Shelter Sites (closed camp sites)	<p>Rock overhangs in areas of sandstone geology can contain evidence of past Aboriginal occupation. This can include stone artefacts, food refuse such as bone or shell if suitably preserved deposits are present. Shelters also can contain pigment art (see below). The project area contains suitable geology for this site type and there is some potential for shelter sites.</p>



Site Type	Description
Art Sites	Petroglyphs (also referred to as Rock Engravings) are art sites where marks have been made in stone by Aboriginal people (for example, spirit figures, animals, implements and footprints). These sites are most commonly found on flat exposed open areas of sandstone. Art within rock shelter is usually painted with ochres and pigments on smooth surfaces on the walls of the shelter. The project area is likely to contain rock overhangs, therefore there is some potential for this site type.
Quarries	Aboriginal quarry sites are sources of raw materials, primarily for the manufacture of stone tools, but also for ochre procurement. They are only found where raw materials (stone or ochre) occur within the landscape, and where these have been exploited in the past. Such sites are often associated with stone artefact scatters and stone knapping areas. The project area is unlikely to contain suitable geology for this site type.
Bora/Ceremonial	Aboriginal ceremonial sites have high cultural value to Aboriginal people. They may comprise natural landforms and, in some cases, will also have archaeological material. Bora grounds are a ceremonial site type, usually consisting of a cleared area around one or more raised earth circles, and often comprised two circles of different sizes, connected by a pathway, and accompanied by ground drawings or mouldings of people, animals or deities, and geometrically carved designs on the surrounding trees. These places are more likely to be found below hills or peaks or above low land subject to inundation. These sites are generally determined through community consultation or sometimes via historic recordings. The background review does not indicate that this type of site will be present in the project area.
Natural Mythological (Ritual) sites	These types of sites are usually identified by the local Aboriginal community as locations of cultural significance, and they may not necessarily contain material evidence of Aboriginal associations with the place. These sites are generally determined through community consultation or sometimes via historic recordings. The background review does not indicate that this type of site will be present in the project area.
Middens	Middens are the accumulation of debris from fish, crustaceans and other shell fish (shells, fish bones) consumed as part of Aboriginal people's diet. Middens also often contain charcoal, stone artefacts, bone and other types of material used by Aboriginal people. Middens often occur within close proximity to freshwater and saltwater sources which have potential to contain mussels, oysters and other types of edible bivalves. Due to the distance to water, this type of site is unlikely.
Burial	Burials can be found in many different archaeological contexts, including shelter deposits and most often where the ground is soft and sandy. Burials can also be found within middens. They can be associated with carved or scarred trees and ceremonial sites. Burials are difficult to detect unless there are visible eroded evidence of a burial or human remains or they have been identified through historic records, or oral histories. The nature of soils and background review do not indicate that this type of site will be present in the project area.
Contact / Historical Sites	These types of sites are most likely to occur in locations of Aboriginal and settler interaction, such as on the edge of pastoral properties or towns. Artefacts located at such sites may involve the use of introduced materials such as glass or ceramics by Aboriginal people or be sites of Aboriginal occupation

Site Type	Description
	in the historical period. Contact sites are most often determined through community consultation. The background review does not indicate that this type of site will be present in the project area.

#### 4.2.1 Database Searches

Searches of the NSW State Heritage Register, Inventory and the Australian Heritage database were undertaken. No Aboriginal archaeological sites or places of cultural heritage significance were recorded on these databases. No Aboriginal sites are recorded on the Lane Cove LEP within the project area.

A search of the OEH AHIMS database was undertaken in September 2018 for an area at Datum:GDA, Zone: 56, Eastings: 331000 - 333000, Northings: 6253000 - 6257000. A total of 79 sites was recorded within this area. None of the sites is within the project area.

There is a mixture of open sites and 'closed' sites (within rock shelters), recorded in the vicinity of the project area. By far the most common site type in the locality is midden sites. These occur within and out of rockshelters, most commonly along the harbour and river foreshores. Rockshelter sites are overall more common than open sites. This is consistent with predictive modelling.

**Table 3: Site features from AHIMS results**

Site Feature	Frequency	Percentage
Art (shelter with art)	2	2.5
Art – rock engravings (open site)	3	3.8
Art & artefact (shelter site)	1	1.3
Art, midden & artefact (shelter site)	5	6.3
Artefact & midden (shelter site)	29	36.7
Artefact & midden (open site)	24	30.4
Artefact (shelter site)	1	1.3
Artefacts (Open Camp Site or Isolated Finds)	5	6.3
Potential Archaeological Deposit (PAD open site)	4	5.1
Shelter site	1	1.3
Burial with midden (open site)	1	1.3
Burial with midden (shelter site)	2	2.5

Site Feature	Frequency	Percentage
Grinding Groove & rock engraving	1	1.3
<b>Total</b>	<b>79</b>	<b>100%</b>

The locations of the registered sites recorded in AHIMS are shown in Figure 5. The location information for sites recorded within the AHIMS is subject to variation in recording methods. Coordinates provided are often indicative rather than exact. The accuracy of locations cannot always be relied on. The author cannot vouch for the accuracy of the information provided by OEH or other agencies.

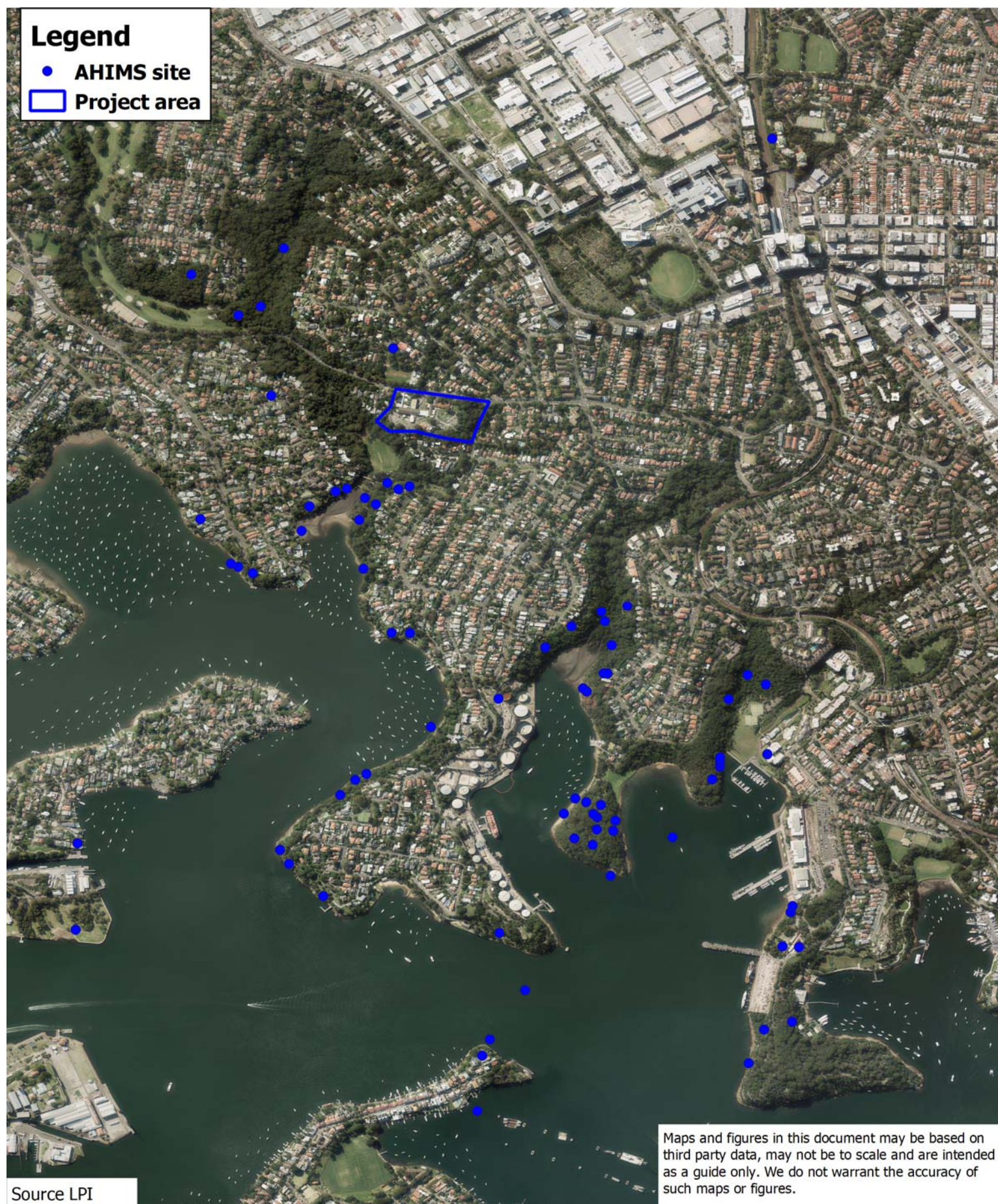
Artefact and stone types identified in artefact sites across the region include flakes, broken flakes, flaked pieces, broken pebbles, micro-blades, cores, backed blades and blades. Raw materials included quartz, silicified wood, tuff, chert, quartzite, volcanic, silcrete, and chalcedony. Stone artefact sites have been located within the study area and the broader project area. Stone materials include silcrete, quartz, and a stone known as either indurated mudstone or tuff.

### **4.3 SUMMARY**

The region has been shown to have been a favoured place of occupation for Aboriginal groups in the past. The project area vicinity has abundant resources and would have provided for relatively large groups. Artefact scatters of high density are usually found within 200 metres of significant waterways with the highest significance sites within 100 metres on elevated terraces. Subsurface artefact densities will be lower on upper slopes and crest/ridgelines and higher on lower slopes.

In summary, there would have been relatively large Aboriginal populations utilising the project area and surrounds. The number of sites recorded on AHIMS is a fraction of what once would have been present. The major factor influencing the potential for unrecorded sites to be located will be the level of disturbance in this developed area.





0 0.5 1 1.5 km

**Figure 5: AHIMS site locations**



## 5.0 SITE INSPECTION & PROJECT MEETING

A site meeting to discuss project information and an opportunity to inspect the site was provided to all RAPs. The meeting took place on 5<sup>th</sup> September 2018.

### 5.1 AIMS & METHODS

The aim of the site inspection was to determine whether any unrecorded Aboriginal objects or areas of sub-surface archaeological potential would be likely to occur in the project area and whether development of the subject land could have the potential to impact these sites or areas. The external parts of the project area were inspected on foot. No inspection was undertaken within standing buildings.

The aims of the site meeting were to provide an opportunity for all RAPs to:

- review the project information and ask questions about the nature of the development and its impacts;
- inspect the site;
- discuss cultural knowledge for the study area;
- provide cultural information to identify:
  - whether there are any Aboriginal objects of cultural value to Aboriginal people in the project area;
  - whether there are any places of cultural value to Aboriginal people in the project area (whether they are Aboriginal places declared under s. 84 of the *NPW Act* or not);
  - consider places of social, spiritual and cultural value, historic places with cultural significance, and potential places/areas of historic, social, spiritual and/or cultural significance within the project area;
  - express views on potential management options including ways to avoid or mitigate harm and/or conserve Aboriginal cultural heritage values; and
- consider how Aboriginal people can continue their association with identified Aboriginal heritage values.

### 5.2 RESULTS

Project information and a draft project methodology was sent to all RAPs on 31st July 2018. Due to the nature of the site, the opportunity was provided for a site visit to discuss any questions and provide to discuss cultural concerns or record any cultural information.

The site meeting was attended by the following RAPs:

- Jenny Beale and Jack Gibson, representing *Butucarbin Aboriginal Corporation*

An initial discussion and review of the proposal was undertaken, and hard copy plans provided. This was followed by a walkover of the project areas. Ken McPhail of HammondCare accompanied the RAPs and the archaeologist providing clarification of the proposal plans, where necessary.

The western three quarters of the site has been subject to disturbance from the construction of hospital buildings, roads, services and landscaping including cut and fill earthworks. There is low to negligible archaeological potential within these developed areas.

At the eastern boundary of the site is an area of bushland that does not appear to have been previously developed (with the exception of the access road that cuts through the area from St Vincents Road). There is a row of sandstone overhangs at the top of the area and the area slopes steeply down to St Vincents Road. Ground surface visibility is low and some of the rock overhangs are inaccessible due to vegetation. None of the overhangs appears to be large (Figure 6). To the north of the access road much of the face of the slope has been covered with mulch and landscaping fill (Figure 7). It is not possible to be certain whether there are rock overhangs under this fill. It is likely there are some small overhangs.

The RAPs identified the eastern portion of the project area as an area of interest due to the lack of disturbance. Suggestions were made to consider an acknowledgement of Aboriginal cultural values within open space. Further information relating to the RAP input is detailed in the ACHAR for this project.

**Figure 6: Vegetated area with rock overhangs**



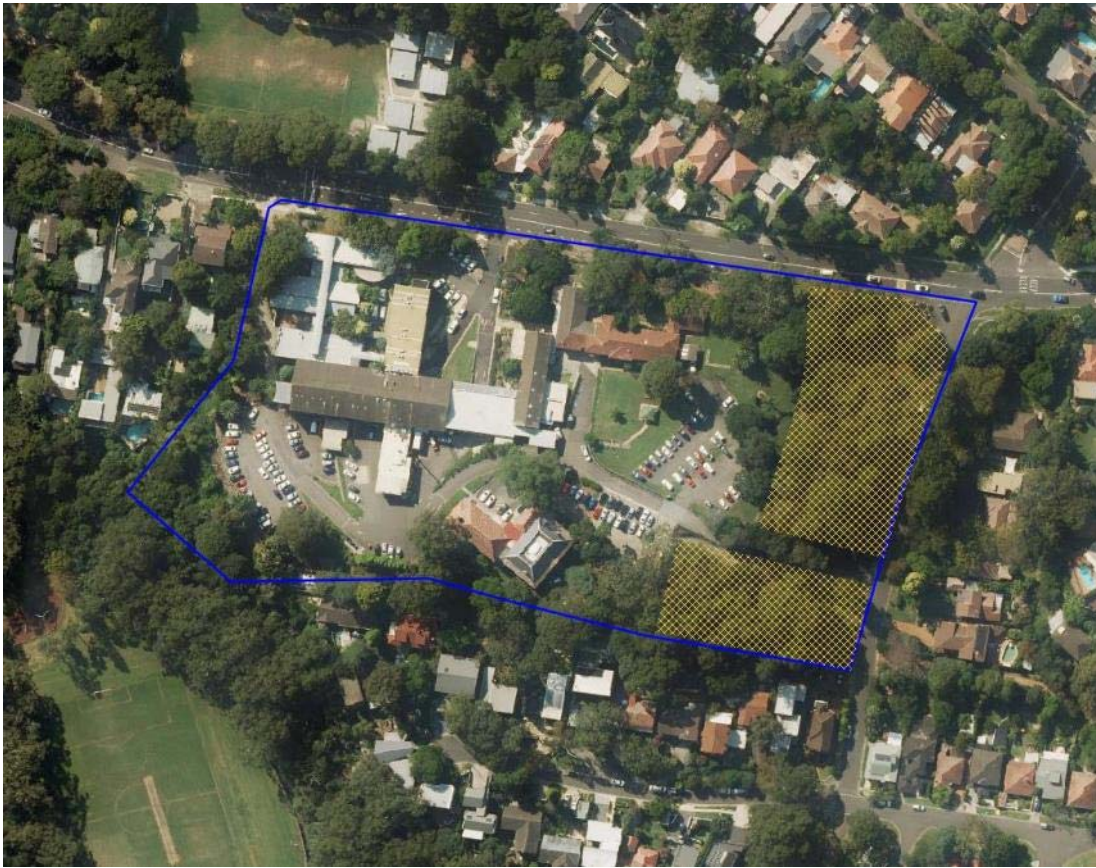
**Figure 7: Slope with zero natural ground surface visibility**



No Aboriginal objects were located during the site inspection. No culturally modified trees were located in the project area. No landforms of high archaeological sensitivity were noted within the project area. The shallow and erosion prone nature of the soils would suggest there is unlikely to be moderate or high density intact archaeological deposit in most open areas. There is some potential for Aboriginal objects within the vegetated bushland at the eastern boundary of the site. If sites were to occur, they would most likely be in the rock overhangs. The area of moderate archaeological potential is shown in Figure 8. Any sites in this area would likely be low density artefact scatters or possibly rock art within the rock overhangs.



**Figure 8: Area of moderate archaeological potential (orange shading)**



## **6.0 IMPACT ASSESSMENT**

The following definitions of harm are reproduced from OEH (2011).

### **Direct harm/impact**

Direct harm may occur as the result of any activity which disturbs the ground including, but not limited to, excavation of soils, site preparation activities, installation of services and infrastructure, roadworks, excavating detention ponds and other drainage or flood mitigation measures, and changes in water flows affecting the value of a cultural site.

### **Indirect harm/impact**

Indirect harm may affect sites or features located immediately beyond, or within, the area of the proposed activity. Examples of indirect impacts include, but are not limited to, increased impact on art in a shelter site from increased visitation, vibration impacts to rock shelters from construction equipment, destruction from increased erosion and changes in access to wild food resources. (OEH 2011).

## **6.1 DESCRIPTION OF THE PROPOSED DEVELOPMENT**

The proposed redevelopment of Greenwich Hospital has been designed to increase the service potential and amenity of the site. The proposal seeks to replace existing hospital accommodation with a campus of:

- 150 place Hospital Health Care Facility with a mix of inpatient hospital beds, palliative care beds and aged care beds;
- Inpatient and outpatient support services and areas necessary to provide a modern, attractive health facility consistent with Hammond Care's high standard of care;
- 80 new seniors housing (apartments) addressing River Road;
- 9 new seniors housing (villas) addressing St Vincents Road;
- Pallister House will be retained and continue to fulfil its present functions; and
- Car parking generally in accordance with code requirements.

The demolition of existing buildings and structures on site (excluding Pallister House which will be retained in its current form) is required to accommodate the proposed redevelopment. Some tree removal will be also be required. Additional service infrastructure and water management will also require ground disturbance. Indirect impacts could include increased site use from additional residential development, particularly in the eastern, currently undeveloped, portion of the project area.

Plans of the existing site configuration and the proposed development are included in Appendix 1.

## **6.2 JUSTIFICATION OF THE OBJECTIVES OF THE PROPOSED ACTIVITY**

The building fabric of Greenwich Hospital has reached the end of its design and useful life and is no longer suitable for best practice service delivery. HammondCare's long term goal has been to upgrade the site and deliver an innovative and integrated model of health

care, consistent with HammondCare's 'Future Directions' strategic plan. The impacts of not proceeding with the proposed development include:

- Continued under-utilisation of the site;
- Reduced access to a range of healthcare services; and
- Loss of significant, additional employment opportunities and significant community benefit.

### **6.3 POTENTIAL HARM TO ABORIGINAL OBJECTS**

The development of the site will include construction of buildings and associated ancillary infrastructure, landscaping and demolition. This will involve cutting and removal of soils as well as soil disturbance. These activities would be likely to disturb or damage any Aboriginal objects that might be present.

sWithin the portion of land identified as having moderate archaeological potential development impacts have been minimised (see Section 6.4 below).

#### **6.3.1 Impacts to Declared Aboriginal Places**

No Aboriginal Places have been declared within the project area.

#### **6.3.2 Previous AHIPs issued**

There have been no previous AHIPs issued for the project area.

### **6.4 IMPACT MITIGATION**

No Aboriginal objects have been recorded in the project area and the archaeological assessment has concluded that there is a low potential for unrecorded object to occur over much of the project area. Direct impacts on Aboriginal heritage have been minimised by the location of new buildings within previously disturbed areas.

Within the identified area of archaeological potential development is limited to low density residential spaces that employ a pier and beam structural system to avoid extensive excavation.

Additional impact mitigate could include, further surface survey following the removal of garden landscaping material and clearing of the impediments to access rock overhangs. The proposed development does not include direct impacts to rock overhangs. If rock overhangs were found to include Aboriginal sites, indirect impacts could be managed via a management plan document to include protection of cultural values.

## **7.0 DISCUSSION & RECOMMENDATIONS**

This section provides a summary of the results of the assessment and a discussion of the ongoing Aboriginal archaeological management requirements for the project.

### **7.1 DISCUSSION & CONCLUSIONS**

The project area is sloping in nature and does not include a significant water source. Although Gore Creek is within 100 metres, the project area is elevated above the creek at the top of a steep slope. The project area is therefore unlikely to have been a favoured camping location. Some rock overhangs are located near the eastern perimeter facing St Vincent Street. These have some archaeological potential.

In light of the site inspection, the recommendations of the previous due diligence report (GML Heritage 2018) were reviewed. The GML report suggests that part of the southwest of the project area, adjacent to Gore Creek retains high archaeological potential. Inspection of this area revealed a steep landform that is highly likely to have been significantly eroded.

The GML predictions of high moderate and low areas of archaeological potential seem to have largely been based on the level of disturbance, specifically prior building construction. The predictions of archaeological potential in this assessment are based on ground surface disturbance, but also include a consideration of the likely past use of the landscape and the natural erosion in this type of landscape.

High density open sites outside of middens based on creeklines are relatively uncommon in the local landscape. The most likely location of sites in the locality is within shelters. The original landform steep slope with limited soil preservation is unlikely to have been conducive to preserving open sites, even prior to additional ground surface disturbance due to the site's development.

The site has been developed since the late 1800s and was extensively re built from the 1960s for its current use as a hospital. This development would likely have removed most of any Aboriginal objects that may have previously been present.

Therefore, it has been assessed that for most of the project area there is a low likelihood of Aboriginal objects occurring. One portion of the project area (shown in Figure 8) has some potential for Aboriginal objects within rock overhangs that are currently inaccessible. Visibility is low in this area. The potential for Aboriginal objects to occur is assessed as moderate in the line of rock overhangs. Figure 8 shows the extent of the area of moderate archaeological potential.

### **7.2 RECOMMENDATIONS**

On the basis of the findings of the above archaeological assessment and the legislative framework for protecting and assessing Aboriginal archaeological sites in NSW, the following recommendations are provided:

- 1) In the parts of the project area assessed as having low archaeological potential and low potential to contain Aboriginal objects, it is recommended that there are no objections to the development on Aboriginal archaeological grounds.



- 2) In the area identified as having moderate archaeological potential (Figure 8) impacts should be minimised.
  - a) If rock overhangs are uncovered / made accessible during landscaping works further archaeological inspection should be undertaken to determine whether Aboriginal objects are present. If necessary, a cultural heritage management plan should be put in place to prevent unforeseen indirect or direct impacts to Aboriginal objects.
  - b) As development consent is being sought for Concept Plan approval, development impacts in the area of moderate archaeological potential can be minimised by design refinements, if required, at the subsequent detailed DA stage. These design refinements could include minor repositioning of building footprints; and/or a pier and beam structural system to avoid extensive excavation. Many trees in the area will be retained and disturbance to ground surface area will be kept to a minimum. In light of this, the likelihood of impact to Aboriginal objects in this area is low. When the development footprint and construction methods are finalised, impacts should be managed via a construction management plan.
  - c) Consideration should be given to interpretation of cultural values to be incorporated in to the open space areas within the development.
- 3) A protocol should be put in place to deal with any unexpected Aboriginal objects that may be located during the course of the project. This should be included in the construction management plan or equivalent documentation. A draft protocol is presented below.
- 4) In the extremely unlikely event that suspected human remains are found the *Coroners Act 2009* requires that all work must cease, the site should be secured and the NSW Police and the NSW Coroner's Office should be notified. If the remains are found to be Aboriginal, OEH and the LALC should be contacted to assist in determining appropriate management.

## Ongoing management to protect Aboriginal Objects

As discussed in Section 2.0, an AHIP is not required for SSD. Therefore, if Aboriginal objects were located during the project they could be managed according to the agreed protocol. The following is a suggested procedure to deal with unexpected finds during the life of the project.

- On-site employees or contractors involved in ground surface disturbance should be made aware of the statutory obligations that apply to the discovery of Aboriginal objects prior to the commencement of works.
- If a suspected Aboriginal object is located during construction, works should cease in the vicinity of the find and a fully qualified archaeologist with experience in archaeological excavation and identifying Aboriginal objects and should be called to site to determine the nature of the object.
  - If it is confirmed that it is an Aboriginal object and it is in an isolated context (i.e. it is not likely that *in situ* deposit or further items will be present), its location can be recorded and it can be removed and the works

continue. The RAPs should be contacted regarding appropriate long-term management of the object.

- If it is confirmed that it is an Aboriginal object and it is suspected that further material or in situ deposit could be present the RAPs should be contacted to determine an appropriate excavation strategy to salvage the in situ objects.
- Consideration should be given to relocating any Aboriginal objects removed from the site back into a secure place within the project area.
- If the item is found to not be an Aboriginal object, works may continue.

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STRAHLER, R. L.

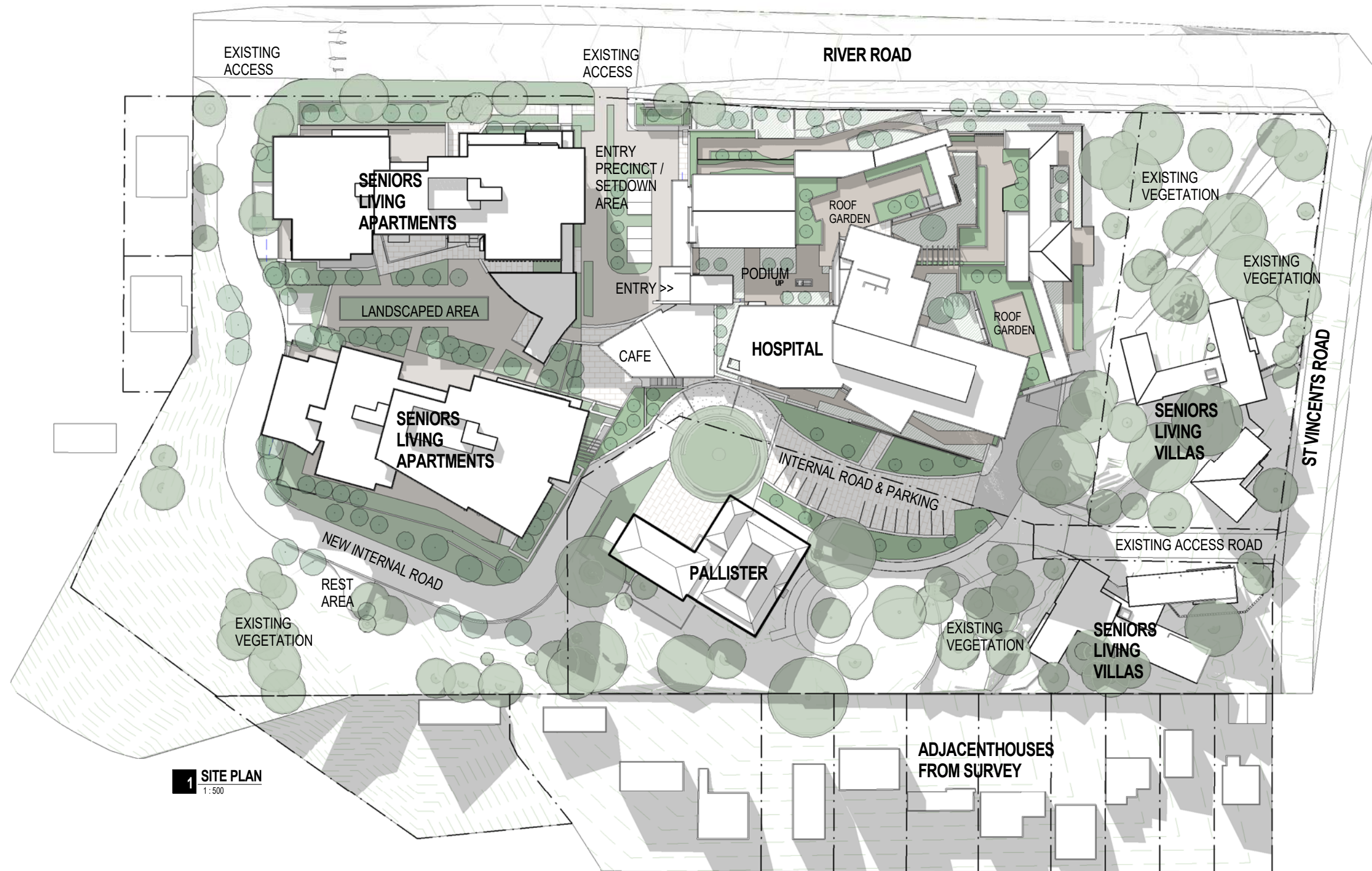
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## **APPENDIX 1: DEVELOPMENT PLANS**

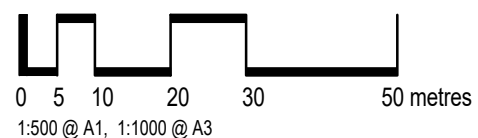


**1 SITE PLAN**  
1:500

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BE VERIFIED ON SITE.

REV	DATE	DETAILS	INITIALS
A	16/03/2018	CONCEPT PLAN ISSUE	ML



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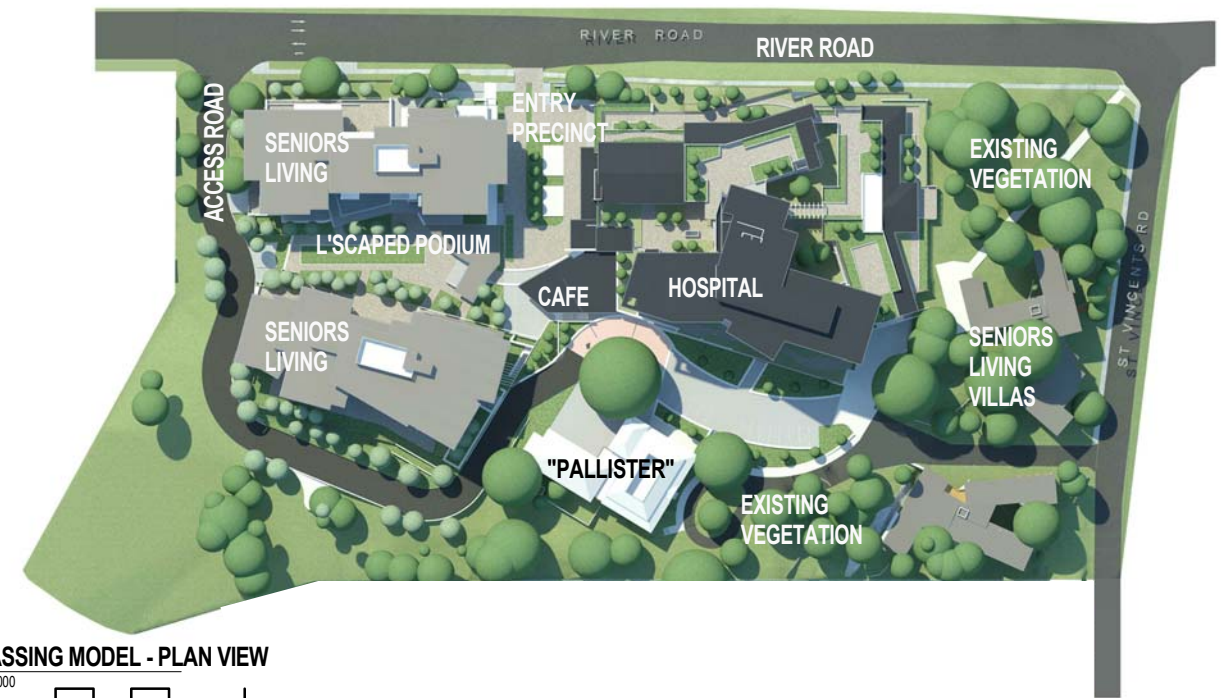
CLIENT: **HammondCare**  
PROJECT: **GREENWICH HOSPITAL  
CONCEPT PLAN**

DRAWING TITLE: SITE PLAN - OVERALL			
DATE: MARCH 2018	DRAWN:	PROJ ARCH:	SCALE: 1:500@A1
	PROJ: 1213	DRAWING: S.02	REVISION: A





**MASSING MODEL**  
ELEVATED VIEW FROM SOUTH OF SITE



**1 MASSING MODEL - PLAN VIEW**  
1:1000  
0 10 20 30 50M

- LANDSCAPED TERRACE AT PODIUM LEVEL
- ROOF TERRACES TO 1 & 2 STOREY WINGS
- LANDSCAPED COURTYARD AT PODIUM LEVEL
- EXISTING OPEN "PARK" LANDSCAPE AT CORNER OF SITE
- ROOF TERRACES TO 1 & 2 STOREY WINGS
- MAIN HOSPITAL WING
- SOUTHERN TERRACE PARALLEL TO INTERNAL LOT LINE
- SENIORS LIVING VILLAS
- "PALLISTER" HERITAGE BUILDING
- CONTROLLED ACCESS ROAD (EXISTING)
- SENIORS LIVING VILLAS
- APPROX MASSES OF ADJACENT HOUSES FROM SURVEY

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BE VERIFIED ON SITE.

A	16/03/2018	CONCEPT PLAN ISSUE	ML
REV	DATE	DETAILS	INITIALS



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CLIENT:  
**HammondCare**  
PROJECT:  
**GREENWICH HOSPITAL  
CONCEPT PLAN**

DRAWING TITLE: <b>3D VIEWS - SITE</b>			
DATE: MARCH 2018	DRAWN:	PROJ ARCH:	SCALE: 1:1000@A1
	PROJ: 1213	DRAWING: S.08	REVISION: A

## APPENDIX 2: CONSULTATION LOG



## CONSULTATION LOG

### PROJECT: Renovation Greenwich Hospital - HammondCare

#### Stage 1: Notification of project proposal and registration of interest

Action	Outcome	Notes	Follow Up
<b>STAGE 1</b>  Step 4.1.1  Wrote to Registrar at National Native Title Tribunal by post, <i>letter dated 22 June 2018</i> .		No response by deadline.	Email sent to <a href="mailto:enquiries@nntt.gov.au">enquiries@nntt.gov.au</a> with copy of original notification letter requesting identification of relevant knowledge holders to the project area. <i>Email sent 12 July 2018.</i> Response <i>13 July 2018</i> advising that there are no Native Title Determination Applications, Determinations of Native Title, or Indigenous Land Use Agreements over the identified area
Step 4.1.2  Wrote to: Aboriginal Land Rights Act Metropolitan Local Aboriginal Land Council Local Land Services (LLS) NTSCORP <i>Letters dated 22 June 2018</i>  Office of Environment and Heritage (OEH) Lane Cove Council <i>Letter dated 26 June 2018</i>	Response from LLS via email with recommendation to contact OEH for identification of stakeholders for project, <i>dated 28 June 2018</i> .  Response from Office of the Registrar ALRA directing queries to MLALC, <i>dated 2 July 2018</i>  Response from OEH providing a stakeholder list for the Greater Sydney Branch, <i>dated 4 July 2018</i>		
Step 4.1.3  Notification placed in local newspaper North Shore Times, Thursday 28 June with closing date for registration of interest included as 14 days from publication (Thursday 12 July 2018).	Letter from Darug Land Observations, notifying expression of interest for project, <i>dated 5<sup>th</sup> July 2018</i>		
4.1.4  Closing date for registration of interest included in the notification letters and notice in the newspaper was at least 14 days from the date (Thursday 12 July 2018)			

Action	Outcome	Notes	Follow Up
<p>Letters of notification and invitation to register interest in the project within 14 days of notification (26 July 2018) sent to those individuals and groups identified by OEH in Step 4.1.2.: <i>Letters dated 11 July 2018</i></p> <p>Via email: Barking Owl Aboriginal Corporation Biamanga Bilinga Bilinga Cultural Heritage Technical Services Callendulla DJMD Consultancy Dharug Didge Ngunawal Clan Duncan Falk Consultancy Ginniderra Aboriginal Corporation Gulaga Gunyu Cultural Heritage Technical Services Gunyu Jerringong Butucarbin Aboriginal Corporation Murramarang Murrumbul Murrumbul Cultural Heritage Technical Services Munyunga Cultural Heritage Technical Services Muyunga Nerrigundah Nundagurri Pemulwuy CHTS Thauaira Thoorga Nura Wailwan Aboriginal Digging Group Walbunja Walgulu Wingikara Wingikara Cultural Heritage Technical Services Yerramurra Yulay Cultural Services</p> <p>Via express post: Metropolitan Local Aboriginal Darug Aboriginal Cultural Heritage Assessments Eric Keidge Tocomwall Badu Goobah Developments Wullung Minnamunning</p>	<p>Darug Land Observation registered <i>5 July 2018</i></p> <p>Lilly Carroll registered interest via email on behalf of Didge Ngunawal Clan, nominating Paul Boyd as their point of contact on <i>12 July 2018</i>.</p> <p>Arika Jalomaki registered interest on behalf of Yulay Cultural Services via email on <i>14 July 2018</i></p> <p>Phil Boney registered interest on behalf of Wailwan Aboriginal Digging Group via email on <i>16 July 2018</i>.</p> <p>Wendy Smith registered interest on behalf of Gulaga via email on <i>17 July 2018</i>.</p> <p>Response from Biamanga via email on <i>25 July 2018</i>. Requested further correspondence to email address, no nominated contact.</p> <p>Response from Murramarang via email on <i>25 July 2018</i>. Requested further correspondence to email address, no nominated contact.</p> <p>Darren Duncan registered interest on behalf of DJMD Consultancy <i>25 July 2018</i>.</p> <p>Scott Franks registered on behalf of Tocomwall via email on <i>20 July 2018</i>.</p> <p>Celstine Everingham registered interest on behalf of DACHA via follow up call <i>26 July 2018</i>.</p> <p>Jack Gibson, registered interest on behalf of Butucarbin via follow up call <i>26 July 2018</i>.</p> <p>Duncan Falk registered interest via email <i>25 July 2018</i> nominating himself as dedicated contact person - details are T: 0406610644 E: <a href="mailto:duncanfalk@hotmail.com">duncanfalk@hotmail.com</a></p> <p>Corey Smith registered interest on behalf of Cullendulla via email on <i>25 July 2018</i> correspondence via email.</p>	<p>The following email recipients were returned undelivered (mail delivery failed). Postal addresses not provided.: <a href="mailto:munyunga@mirramajah.com">munyunga@mirramajah.com</a> <a href="mailto:murrumbul@mirramajah.com">murrumbul@mirramajah.com</a> <a href="mailto:winigkara@mirramajah.com">winigkara@mirramajah.com</a> <a href="mailto:bilinga@mirramujah.com">bilinga@mirramujah.com</a> <a href="mailto:gunyuu@mirramujah.com">gunyuu@mirramujah.com</a> <a href="mailto:billingachts@gmail.com">billingachts@gmail.com</a></p> <p>The following recipients' email addresses returned as does not exist: <a href="mailto:jerringon@gmail.com">jerringon@gmail.com</a> <a href="mailto:ginniderra.corp@gmail.com">ginniderra.corp@gmail.com</a> <a href="mailto:Cullendullachst@gmail.com">Cullendullachst@gmail.com</a> <a href="mailto:muyungachts@gmail.com">muyungachts@gmail.com</a></p> <p>The following groups are only contactable via email: Biamanga Bilinga Bilinga Cultural Heritage Technical Services Callendulla Dharug Gulaga Gunyu Cultural Heritage Technical Services Gunyu Murramarang Murrumbul Murrumbul Cultural Heritage Technical Services Munyunga Cultural Heritage Technical Services Muyunga Nundagurri Thauaira Walgulu Wingikara Wingikara Cultural Heritage Technical Services Yerramurra</p>	<p>Celstine Everingham registered interest on behalf of DACHA via follow up call <i>26 July 2018</i>. Note that the postal address and phone number provided by OEH are Celestine's, not Gordon Morton.</p> <p>Jack Gibson, registered interest on behalf of Butucarbin via follow up call <i>26 July 2018</i>. Note that Jack states he did not receive emails even though read response received.</p> <p>A follow up sms was sent to those individuals/groups that had not yet registered interest <i>20 July 2018</i>: This is a follow up to check you received an invitation to register interest in the Aboriginal cultural heritage assessment of the proposed Greenwich Hospital redevelopment. If you would like to register your interest please do so by the 26 July. If you require us to resend the information please reply or contact <a href="mailto:kyliemcd@heritageconnect.com.au">kyliemcd@heritageconnect.com.au</a></p> <p>The following recipients phone numbers registered failed: Pemulwuy CHTS/Pemulwuy Johnson 0425066100 Wullung/Lee-Roy James Boota 0403703942 Badu/Karla Lea Bond 0476381207</p> <p>No response has been received from MLALC; email sent to Nathan Moran on <i>20 July 2018</i>. No response as of deadline closing <i>26 July 2018</i>.</p>

Action	Outcome	Notes	Follow Up
	Basil Smith registered interest on behalf of Goobah – 26 July 2018 requested correspondence via email.		
4.1.5 Advise people registering interest that details will be forwarded to OEH and LALC	Included in email or letter with draft methodology.		
4.1.6 Record of the names of each Aboriginal person who registered interest and provide a copy to OEH and LALC within 28 Days of closing date	Sent via email 5/8/2018		
4.1.7 Registration of LALC with an interest in the project	Metropolitan LALC registered		
4.1.8 A contact for Aboriginal Organisation or representative for knowledge holder must be nominated	Although asked for this was not given for all organisations.		
<b>STAGE 2 &amp; 3</b> Steps 4.2.1, 4.2.2, 4.2.3, 4.3.1 &, 4.3.2  Letter providing project information and draft methodology sent to all RAPs on 31/7/2018, 28 days were provided for comment on the document as well as the opportunity to discuss via telephone if desired. Letter and meeting both provided opportunities for RAPs to define roles and process for assessment as well as to discuss project methodology.  Date for close of comment on methodology 30/8/2018.	No responses suggested alternatives for methodology or assessment approach.  Darug Land Observations provided comment on the project information and draft project methodology stating support of the methodology and also noting that they strongly believe that recovered artefacts should be re-buried on Country (project area). Tocomwall provided the information that they will not review information if not paid and that they will reject all reports if their services are not paid for. The following groups provided endorsement of the methodology with no comments or changes: <ul style="list-style-type: none"> <li>• Yulay Cultural Services</li> <li>• Duncan Falk Consultancy</li> <li>• Didge Ngunawal Clan</li> </ul>		
Step 4.2.4  All RAPs were provided the opportunity to attend a site meeting to discuss project information and provide another opportunity to provide information to assist in determining cultural heritage values and ongoing management. Meeting was held on 5 <sup>th</sup> September 2018.	Jenny Beale and Jack Gibson from Butucarbin Aboriginal Corporation attended the site meeting.	The RAPs identified the eastern portion of the project area as an area of interest due to the lack of disturbance. Suggestions were made to consider an acknowledgement of Aboriginal cultural values within open space.	

Action	Outcome	Notes	Follow Up
<p>Steps 4.3.3 &amp; 4.3.4</p> <p>Letters contained invitations to accept information in writing or verbally relating to cultural significance. It was offered to provide a male or female archaeologist to discuss information if necessary.</p>	<p>No additional information relating to cultural values or the cultural significance of the project area was provided other than that noted above.</p>		
<b>STAGE 4</b>			
<p>Steps 4.4.1, 4.4.2 &amp; 4.4.3</p> <p>A draft report was prepared and sent to all RAPs on 29/10/2018. The RAPs were given a minimum of 28 Days (until 27/11/2018) to comment on the draft.</p>	<p>The only comment received was from Darug Land Observations on 6 November via email. The comments stated that they support the proposed activities and that if “any artefacts are recovered during the construction stages, we strongly believe that these recovered artefacts should be re-buried on Country”.</p>		
<p>Steps 4.4.4 &amp; 4.4.5</p> <p>Comments were noted in the final report. As there was no requirement for an AHIP no AHIP application was completed. The final reports were made available to the RAPs.</p>			

## **APPENDIX 3: CORRESPONDENCE WITH RAPS**

26 June 2018

General Manager  
PO Box 20  
Lane Cove NSW 1595

Dear Sir/Madam

**Re: Notification – Aboriginal cultural heritage consultation for a proposed redevelopment of Greenwich Hospital**

HammondCare, Level 2, 447 Kent St, Sydney NSW 2000, is undertaking master planning for the redevelopment of Greenwich Hospital, in River Road, Greenwich. The project area is within the Lane Cove Local Government Area (LGA).

The project is being assessed as State Significant Development and as part of the Secretary's Environmental Assessment Requirements (SEARs), issued by the Department of Planning and the Environment, an Aboriginal Cultural Heritage Assessment (ACHA) is required.

Cultural Heritage Connections (CHC) has been engaged to prepare an ACHA, including an archaeological assessment, of the proposed Master Plan. The redevelopment will include some demolition and refurbishment of existing buildings, construction of new buildings and associated services and landscaping.

CHC is undertaking consultation with Aboriginal people according to the Office of Environment and Heritage's (OEH) *Aboriginal cultural heritage consultation requirements for proponents* (DECCW, 2010).

The purpose of Aboriginal community consultation is to:

- assist the proponent in understanding Aboriginal people's views and concerns (if any) about the project;
- provide Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project with the opportunity to participate in decision making about the management of their cultural heritage by providing the proponent information regarding cultural significance and feedback on management options;
- provide an opportunity for Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or



place(s) in the area of the proposed project to be involved in consultation so that information about cultural significance is provided to OEH to assist in decision making;

- understand cultural values present in the area; and
- assist the Director-General of OEH in his or her consideration of the determination of an Aboriginal Heritage Impact Permit application (if required).

CHC is seeking to identify Aboriginal persons who hold cultural knowledge relevant to this project area and who may wish to register an interest. Those who choose to register will have the opportunity to provide culturally appropriate information and to comment on the cultural heritage significance of Aboriginal objects and the area.

**If you are aware of Aboriginal people or groups who you believe may wish to register an interest for consultation and who hold cultural knowledge relevant to this project area, please provide their contact details by 5 pm on 12 July 2018.**

Details including the name of the organisation or individual, the name of the contact person for organisations and their postal address, telephone and fax numbers and email address (where available) should be sent to:

Vanessa Hardy  
Cultural Heritage Connections  
PO Box 490  
Dulwich Hill NSW 2203  
email: [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)

If you would like to discuss this notification or have any questions about the proposed works, please contact me on 0410 030 986 or via email [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Vanessa Hardy', with a long horizontal flourish extending to the right.

Vanessa Hardy  
Director & Archaeologist



**CALL FOR REGISTRATIONS - ABORIGINAL HERITAGE**

**Aboriginal community consultation for proposed upgrade of Greenwich Hospital, Greenwich**

HammondCare, Level 2, 447 Kent St, Sydney NSW 2000 is undertaking master planning for the redevelopment of Greenwich Hospital, in River Road, Greenwich.

The upgrade will include demolition of existing buildings, construction of new buildings and associated services and landscaping.

Aboriginal people with cultural knowledge relevant to determining the significance of Aboriginal objects and/or places in the vicinity of these proposed works are invited to register an interest in the process of community consultation.

The purpose of community consultation with Aboriginal people is to assist with the preparation of an Aboriginal Cultural Heritage Assessment (ACHA) and, if required, the preparation of an Aboriginal Heritage Impact Permit (AHIP) for these works. An ACHA is required as part of the Secretary's Environmental Assessment Requirements (SEARs) for the project, issued by the Department of Planning and the Environment. Consultation would also assist the NSW Office of Environment and Heritage to consider and determine an AHIP, should one be required.

**Please register interest before 5 pm on Thursday 12 July 2018 to:**

Vanessa Hardy, Cultural Heritage Connections  
PO Box 490, Dulwich Hill, NSW 2203  
Phone: 0410 030 986  
Email: [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)

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## DEATHS & FUNERALS

### Deaths



**AVRAMIDES, Mary (Maroula)**  
Late of Northbridge  
Passed away suddenly at home on June 22, 2018.  
Aged 87 years.

Dearly loved wife of Jack (dec). Devoted mother and mother-in-law to Monica & Steve, Michael and Margaret, Annie and Christopher, and Andrew and Jane. Cherished Yiayia to Jason and Christine, Leah and Glen, Daniel, Zac, Courtney, Jordan, Paris and Andrew, and Mikey, and to her beloved great-grandchildren Stephanie, Parissa, Jayden, Jack, Isabella and Poppy.

### Forever in our Hearts

Please consider a donation to the Thalassaemia Society, thalnsu.org.au or to Crohn's and Colitis Australia, crohnsandcolitis.com.au in Mary's honour.

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**General Notices**

**OPTUS**

**PROPOSAL TO UPGRADE AN EXISTING MOBILE PHONE BASE STATION AT LINLEY POINT**

Optus proposes to install a new telecommunications facility at Loop Road Exit, Burns Bay Road, LINLEY POINT NSW 2066 (adjacent Lot 2 DP1117218)

- The proposal involves replacement of the existing steel lighting column with a new steel lighting column; replacement of three (3) existing panel antennas with three (3) new panel antennas mounted on a turret at the top of the lighting column; replacement of the existing equipment shelter with one (1) new outdoor equipment cabinet at ground level; and installation of ancillary equipment associated with operation and safety of the facility including remote radio units. The upgrade will provide 4G services and improve the site's performance.
- Optus regards the proposed installation as Exempt Development under the State Environmental Planning Policy (Infrastructure) 2007 based on the description above. The works do not require Council development approval.
- Further information can be obtained from Melanie McDowall at Catalyst ONE on mmcdowall@catalyststone.com.au or by calling 02 9439 1999. Further information on the site can be obtained from www.rfnsa.com.au/2066030.
- Written submissions should be sent to: Catalyst ONE, PO Box 1119, Crows Nest NSW 1585 by **Monday 16 July 2018**

### CALL FOR REGISTRATIONS - ABORIGINAL HERITAGE

**Aboriginal community consultation for proposed upgrade of Greenwich Hospital, Greenwich**

HammondCare, Level 2, 447 Kent St, Sydney NSW 2000 is undertaking master planning for the redevelopment of Greenwich Hospital, in River Road, Greenwich.

The upgrade will include demolition of existing buildings, construction of new buildings and associated services and landscaping.

Aboriginal people with cultural knowledge relevant to determining the significance of Aboriginal objects and/or places in the vicinity of these proposed works are invited to register an interest in the process of community consultation.

The purpose of community consultation with Aboriginal people is to assist with the preparation of an Aboriginal Cultural Heritage Assessment (ACHA) and, if required, the preparation of an Aboriginal Heritage Impact Permit (AHIP) for these works. An ACHA is required as part of the Secretary's Environmental Assessment Requirements (SEARs) for the project, issued by the Department of Planning and the Environment. Consultation would also assist the NSW Office of Environment and Heritage to consider and determine an AHIP, should one be required.

**Please register interest before 5 pm on Thursday, 12 July 2018 to:**  
Vanessa Hardy, Cultural Heritage Connections  
PO Box 490, Dulwich Hill, NSW 2203  
Phone: 0410 030 986  
Email: vanessa@heritageconnect.com.au

**Notice of Special Business Meeting for voting members of North Turramurra Church of Christ.**

According to the terms of the Churches of Christ in New South Wales Incorporation Act 1947 a Special Business Meeting will be held at 12 noon on Sunday 8th July at 217 Bobbin Head Rd North Turramurra. Members will consider a resolution for a variation of the trusts upon which the church's land is held.

**GENERAL FOR SALE**

**Antiques**

**Antiques Vintage & Collectable Fair**  
Glebe Wentworth Park Greyhounds 9am-3pm.  
Sunday 1st of July Entry \$8 (Seniors \$7)  
Enquiries: 0419-333-220

**General For Sale**

**FAMILY VAULT**  
Newly Built, Granite  
16 burial places.  
Macquarie Park Cemetary  
**0412 088 870**

**Garage Sales, Fetes & Markets**

**GORDON**  
Corner Pacific Highway and St. Johns Avenue.  
Garage & book sale  
**Friday 29th June 9.30am - 12.30pm**

## GENERAL FOR SALE

### Garage Sales, Fetes & Markets

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Corner Aubin & Thrupp St

### General For Sale

**FAMILY VAULT**  
Newly Built, Granite  
16 burial places.  
Macquarie Park Cemetary  
**0412 088 870**

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boc.net.au

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news local

11<sup>th</sup> July 2018

Metropolitan Local Aboriginal  
Nathan Moran  
PO Box 1103  
Strawberry Hills NSW

Dear Sir/Madam

**Re: Notification – Aboriginal cultural heritage consultation for a proposed redevelopment of Greenwich Hospital**

HammondCare, Level 2, 447 Kent St, Sydney NSW 2000, is undertaking master planning for the redevelopment of Greenwich Hospital, in River Road, Greenwich. The project area is within the Lane Cove Local Government Area (LGA).

The project is being assessed as State Significant Development and as part of the Secretary's Environmental Assessment Requirements (SEARs), issued by the Department of Planning and the Environment, an Aboriginal Cultural Heritage Assessment (ACHA) is required.

Cultural Heritage Connections (CHC) has been engaged to prepare an ACHA, including an archaeological assessment, of the proposed Master Plan. The redevelopment will include some demolition and refurbishment of existing buildings, construction of new buildings and associated services and landscaping.

CHC is undertaking consultation with Aboriginal people according to the Office of Environment and Heritage's (OEH) *Aboriginal cultural heritage consultation requirements for proponents* (DECCW, 2010).

The purpose of Aboriginal community consultation is to:

- assist the proponent in understanding Aboriginal people's views and concerns (if any) about the project;
- provide Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project with the opportunity to participate in decision making about the management of their cultural heritage by providing the proponent information regarding cultural significance and feedback on management options;
- provide an opportunity for Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project to be involved in consultation so that information about cultural significance is provided to OEH to assist in decision making;



- understand cultural values present in the area; and
- assist the Director-General of OEH in his or her consideration of the determination of an Aboriginal Heritage Impact Permit application (if required).

CHC is seeking to identify Aboriginal persons who hold cultural knowledge relevant to this project area and who may wish to register an interest. Those who choose to register will have the opportunity to provide culturally appropriate information and to comment on the cultural heritage significance of the project area and any Aboriginal objects. This letter is an invitation to your organisation to participate in Aboriginal community consultation for this project.

**If you wish to register your interest to be consulted about this project, please provide your details by 26<sup>th</sup> July by contacting:**

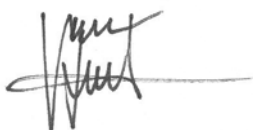
Vanessa Hardy  
Cultural Heritage Connections  
PO Box 490  
Dulwich Hill NSW 2203  
email: [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)

Details for registration of your interest in consultation need to be sent in writing or via email and should include:

- the name of the key contact person for your organisation or individual for all correspondence,
- their postal address,
- telephone contact number (mobile and landline)
- email address (where available).

If you would like to discuss this notification or have any questions about the proposed works, please contact me on 0410 030 986 or via email [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au).

Yours sincerely,



Vanessa Hardy  
Director & Archaeologist

**Subject:** Notification: Aboriginal cultural heritage consultation - Greenwich Hospital

Dear Sir/Madam

Please find attached a notification and invitation to register interest in the Aboriginal cultural heritage assessment of the proposed Greenwich Hospital redevelopment in the Lane Cove Local Government Area.

If you would like to register your interest in the above mentioned project please do so by the 26 July 2018.

Thank you,

**Kylie McDonald**  
**Archaeologist**  
**CULTURAL HERITAGE CONNECTIONS Pty Ltd**  
**Mobile: 0414216156**





**DARUG LAND  
OBSERVATIONS PTY LTD  
ABN 27 602 765 453**

---

EMAIL: [DARUGLANDOBSERVATIONS@GMAIL.COM](mailto:DARUGLANDOBSERVATIONS@GMAIL.COM)  
PO BOX 2006 BENDALONG NSW 2539  
MOBILE: 0413 687 279

5<sup>th</sup> July, 2018

Vanessa Hardy  
Cultural Heritage Connections  
PO Box 490  
DULWICH HILL NSW 2203

Email: [Vanessa@heritageconnect.com.au](mailto:Vanessa@heritageconnect.com.au)

**Notification and Registration of ALL Aboriginal Interests**

RE: PROPOSED REDEVELOPMENT OF GREENWICH HOSPITAL -  
Aboriginal Cultural Heritage Assessment

Dear Vanessa,

Please be advised that Darug Land Observations Pty Ltd is seeking to be involved in any and all consultation meetings and fieldwork.

This office specialises in Aboriginal and community consultations, and has a membership that comprises of Traditional owners from the area in question. Those retain strong story, song lines, oral history and continued contact.

We would also like to state that we do not accept or support any person or organisation that are NOT from the DARUG Nation that comments regarding the said area.

Please also be advised that this Aboriginal organisation does not do volunteer work or attend unpaid meetings. I hope that you advise your client of this so that, 'This Group', will not be discriminated against and refused paid fieldwork. DLO's rate is \$440 half day (less than 4 hours) and \$880 per day (flat rate), including GST.

All correspondence should be emailed to: [daruglandobservations@gmail.com](mailto:daruglandobservations@gmail.com) and any further consultation during this project can be directed to Anna O'Hara on mobile 0413 687 279.

Yours sincerely,

Jamie Workman  
Darug Land Observations Pty Ltd

Uncle Gordon Workman  
Darug Elder



**BUTUCARBIN ABORIGINAL CORPORATION**

PO Box E18, Emerton NSW 2770

28 Pringle Road, Hebersham NSW 2770

Ph: 9832 7167 Fax: 9832 7263

[koori@ozemail.com.au](mailto:koori@ozemail.com.au)

ABN: 83 535 742 276

27<sup>th</sup> July, 2018

To whom it may concern,

Butucarbin Aboriginal Corporation wishes to register its interest to participate in the Aboriginal community consultation for the proposed redevelopment of Greenwich Hospital. We look forward to being involved in the process and appreciate the invitation to do so.

Yours Sincerely,

Jennifer Beale  
CEO



2 July 2018

Vanessa Hardy  
Cultural Heritage Connections  
P.O Box 490  
DULWICH HILL NSW 2203

Dear Vanessa

**Re: Request - Search for Registered Aboriginal Owners**

I refer to your letter dated 22 June 2018 regarding an Aboriginal Cultural Heritage Assessment for the proposed redevelopment of the Greenwich Hospital located in River Road, Greenwich NSW.

I have searched the Register of Aboriginal Owners and the project area described does not have Registered Aboriginal Owners pursuant to Division 3 of the *Aboriginal Land Rights Act 1983*.

I suggest that you contact the Metropolitan Local Aboriginal Land Council on 02 8394 9666 regarding the project. They may also be able to assist you in identifying other Aboriginal stakeholders that wish to participate.

Yours sincerely

A handwritten signature in blue ink, consisting of a large loop followed by a series of smaller, connected strokes.

**Jodie Rikiti**  
**Administration Officer**  
Office of the Registrar, ALRA

# CORROBOREE ABORIGINAL CORPORATION PRESERVING CULTURE AND HERITAGE

18 July 2018

Cultural Heritage Connections  
Attention: Vanessa Harding  
PO Box 490  
DULWICH HILL NSW 2203  
Email: [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)

Dear Vanessa

Re: **Expression of Interest all aspects** – Aboriginal cultural heritage for proposed upgrade at  
Wentworthville Public School, Wentworthville, NSW

Please register our corporation all aspects. We have previously consulted in the surrounding area. Corroboree Aboriginal Corporation has participated in previous archaeological fieldwork with archaeologists such as yourself as Cultural Heritage Site Officers. As such we have undertaken direction from project archaeologists on every occasion. I or one of our members have participated on numerous project sites: Some of the archaeologist we have consulted with:

Comber Consultants

Niche

Extent

Artefact

Jillian Comber

Navin Officert

Artefact

AECOM

Dominique Steele

Environment & Heritage

ECM

EMM GROUP

Kayandel

Biosis

Apex

Our Corroboree Aboriginal Corporation members have all the relevant requirements to enable consulting with Umwelt on behalf of the proponent.

- White card (O&HS)
- Copies of valid workers compensation and public liability insurances
- Australian Business Number and Australian ICN number

**P: 0415911159 F: 02 8824 4324 E: [corroboreecorp@bigpond.com](mailto:corroboreecorp@bigpond.com)**

**ADDRESS: PO BOX 3340**

**ROUSE HILL NSW 2155**

**Web: <http://corroboreecorp.wix.com/corroboreecorp>**

Our corporation Corroboree Aboriginal Corporation has participated in previous archaeological fieldwork with archaeologists as site officers in the Parramatta area and surrounding area, as such we have undertaken direction from project archaeologists on every occasion. I or one of our members attended numerous project sites.

I and members have undertaken in manual labour over extended periods of time. With the archaeologists listed above. Some of the project sites:

Parramatta  
Westmead  
Merrylands  
Kemps Creek  
Doonside  
Rooty Hill  
Riverstone  
Schofields  
Marsden Park  
Rouse Hill  
Pitt Town  
Box Hill  
St Mary's  
Marulan  
Queanbeyan  
Galong  
Mt Pleasant  
Yass  
Goulburn  
Harden

The use of archaeological field tools such as mattocks, shovels, trowels, wheelbarrows, buckets and wet & dry sieving stations have been standard provision on project sites for the preservation of aboriginal artefacts and culture. We have worked in a range of climates, consisting of heat, cold and wet weather. To which we have all worn the correct protective clothing as per OH&S guidelines. Wear long trousers, closed steel-cap footwear (lace up preferably in case of ankle breakage), long sleeve shirt, hat, sunblock, fluorescent vests, water, plus lunch if isolated site and a first aid kit. We have always worked in teams with a broad range of people. We work very well with a team or solo as proven on previous consulting for heritage and culture preservation.

We are able to identify a broad range of aboriginal objects across the landscape:

Core - A piece of stone from which flakes have been removed. They usually have negative flake scars that have resulted from the removal of flakes.

Scarred tree - A tree with a scar on its trunk caused by bark removal.

Silcrete - A hard, fine-grained rock composed of silica cement.

Artefact scatter - A surface scatter of Aboriginal or historic cultural material. Scatters of stone artefacts are a common archaeological site type. These scatters may also contain charcoal, discarded animal bones, shell & ochre.

Hearth - The remains of a campfire containing charcoal, discoloured soil, and possibly, hearthstones, heat retainers or the remains of animals or shellfish cooked and consumed at the campsite.

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**ADDRESS: PO BOX 3340**

**ROUSE HILL NSW 2155**

**Web: <http://corroboreecorp.wix.com/corroboreecorp>**

Formalized tools - An artefact that has been deliberately shaped by flaking, retouch or grinding to produce a predetermined tool type.

Hearthstone – Stone cobble placed in a campfire to retain heat for cooking. The types of stone used as

Survey - An inspection of land either by foot or vehicle for the purpose of identifying archaeological sites.

We do have the relevant project skills, project experience and have also lived in the area so we feel we do therefore qualify for field work. We also have previous knowledge passed down by our Elders Phillip Carroll SNR, Donald Carroll Bell, Dot Carroll, Phyllis (Carroll) Phillips & Our Elder Phillip James Carroll JNR . Including knowledge from working on site with archaeologists. Our experience has been sufficient to find and collect artefacts to protect our aboriginal culture and heritage. I lived in Merrylands on Fowler Rd with my parents. I later moved back to Merrylands with my own family to Burford St. My sister lived in the heart of Parramatta when she married. We have lived in and around surrounding areas most of our lives. We lived a very nomadic lifestyle. We were constantly on the move.

We are able to fulfil the duties of site officer under the direction of the project archaeologist as we have done so on many project sites:

- We have completed site surveying on our heritage walks
- We have pegged out locations for test pitting
- We have used shovels, brushes and trowels to excavate test pits
- We have bucketed or used wheelbarrows to return the excavated materials back to the excavated sites.
- We have sieved excavated material in dry and wet. We have caught the sieved excavated materials with a bucket underneath or shovelled it into the wheelbarrow. Depending on the sites and what the archaeologists have instructed us to do.
- We have identified and recorded, Aboriginal objects and returned them to as close to country as possible when permitted.
- We meet all general and site specific Occupational Health and Safety requirements as per our protective clothing, white card and all necessary insurances.

We have the relevant field skills as we have worked in the field to and are able to identify objects to preserve our culture, heritage. We have furthered our views and knowledge working with archaeologist's previously noted And we have also worked with mining companies which include:

Boral

Sirelco

We have stories, history and knowledge passed down to us by our many Elders which include Phillip Carroll SNR, Phyllis Gertude Phillips, Don Bell and Phillip James Carroll JNR. We therefore further understand on many other levels about land care and management the many facets. Our elders taught us to respect Ngungynate (our Mother Earth). We were taught to how to live and connect with our land as Aboriginal People. Our elders taught us and still teach us to deal sensitively with the land and artefacts. We are very culturally aware.

Furthermore our organisation holds not just a traditional connection but also a spiritual connection in the projects vicinity as it is where our elder and family member passed there. And we are holders of knowledge and experience relevant to determining the cultural significance of Aboriginal objects

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**ADDRESS: PO BOX 3340**

**ROUSE HILL NSW 2155**

**Web: <http://corroboreecorp.wix.com/corroboreecorp>**

and/or places within the subject area in which we have previously participated in previous Archaeological surveys in Parramatta Paddocks and Parramatta Park, Northwest Rail, etc. We have history in the area as we are aboriginal we are connected to the land upon which I and my family members grew up with our family and elders. We connect thru the land, thru our history, thru our ancestors.

As registered local aboriginal stakeholders we are interested in being consultants in relation to the above project in a full consultation capacity and hereby submit our expression of interest for your consideration. Our nominated representative to receive all future correspondence is Marilyn Carroll-Johnson contact number: 0415911159 and our preferred method of communication is email

The majority of our members in our organisation have belonged to Western Sydney and Regional Areas of New South Wales all of our lives. All of our Corroboree Aboriginal Corporation members have a vested interest in the preservation of our Aboriginal Heritage and Culture. Our members are all passionate about the goal of preservation and protection of what is left of our culture. Our members are interested in working with the archaeologist's in a timely and efficient manner. We shall comply with all parties involved and strive to achieve an excellent outcome. Our objectives are to assist the archaeologists in any findings of heritage/cultural artefacts to expedite the development of any sites whilst protecting our heritage. Please do not forward our details correspondence to the land council or OEH. We do not want our private family history disclosed.

Kind regards

Marilyn Carroll-Johnson  
Director CAC  
Ph: 0415911159

**P: 0415911159 F: 02 8824 4324 E: [corroboreecorp@bigpond.com](mailto:corroboreecorp@bigpond.com)**

**ADDRESS: PO BOX 3340**

**ROUSE HILL NSW 2155**

**Web: <http://corroboreecorp.wix.com/corroboreecorp>**

**From:** Gulaga <gulagachts@gmail.com>  
**Sent:** Tuesday, 17 July 2018 1:51 PM  
**To:** kyliemcd@heritageconnect.com.au; vanessa@heritageconnect.com.au  
**Subject:** Re: Notification: Aboriginal cultural heritage consultation - Greenwich Hospital

Hi Vanessa,

Gulaga wish to register their expression of interest for the above project.

We wish to be kept informed of any further developments and all correspondence should be sent to this email address. Thankyou

**Kind Regards**  
**Wendy Smith**  
**Cultural Heritage Officer**  
**Gulaga**  
**0401 808 988**

This email may contain privileged information. Privilege is not waived if it has been sent to you in error, or if you are not the intended recipient. Please immediately notify me and delete the email if you have received this in error.

On Wed, Jul 11, 2018 at 10:23 PM, <[kyliemcd@heritageconnect.com.au](mailto:kyliemcd@heritageconnect.com.au)> wrote:

Dear Sir/Madam

Please find attached a notification and invitation to register interest in the Aboriginal cultural heritage assessment of the proposed Greenwich Hospital redevelopment in the Lane Cove Local Government Area.

If you would like to register your interest in the above mentioned project please do so by the 26 July 2018.

Thank you,

**Kylie McDonald**

**Archaeologist**


**CULTURAL HERITAGE CONNECTIONS Pty Ltd**



**Mobile: 0414216156**

**From:** vanessa@heritageconnect.com.au  
**Sent:** Friday, 13 July 2018 5:30 PM  
**To:** kyliemcd@heritageconnect.com.au  
**Subject:** FW: SR4519 Follow up enquiry Greenwich Hospital Upgrade - SR4519  
**Attachments:** 20180713\_SR4519\_NSW\_Overlap\_Report\_Lane\_Cove\_Municipal\_Council.xlsx

**Vanessa Hardy MAACAI M.ICOSOS MEIANZ**  
**Director & Principal Archaeologist**  
**CULTURAL HERITAGE CONNECTIONS Pty Ltd**  
**Mobile: 0410 030 986**

 *Cultural Heritage Connections acknowledges the Traditional Owners of Country on which we work and throughout Australia. We pay our respects to them, their culture and their Elders past, present and future.*

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**From:** Enquiries <Enquiries@nntt.gov.au>  
**Sent:** Friday, 13 July 2018 5:14 PM  
**To:** 'vanessa@heritageconnect.com.au' <vanessa@heritageconnect.com.au>  
**Subject:** RE: SR4519 Follow up enquiry Greenwich Hospital Upgrade - SR4519

## **UNCLASSIFIED**

**Native title search – NSW within Lane Cove Municipal Council LGA**  
**Your ref: N/A - Our ref: SR4519**

**Dear Vanessa Hardy,**

Thank you for your search request received on 13 July 2018 in relation to the above area. Based on the records held by the National Native Title Tribunal as at 13 July 2018 it would appear that there are no Native Title Determination Applications, Determinations of Native Title, or Indigenous Land Use Agreements over the identified area.

**Please note:** Where the area identified to be searched is indistinct, generalised, or is for a freehold parcel, the results provided may relate to the Local Government Area (LGA) or Local Aboriginal Land Council (ALC).

### **Search Results**

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

- Schedule of Native Title Determination Applications
- Register of Native Title Claims
- National Native Title Register
- Register of Indigenous Land Use Agreements
- Notified Indigenous Land Use Agreements

At the time this search was carried out, there were **no relevant entries** in the above databases.

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

**The Tribunal accepts no liability for reliance placed on enclosed information**

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

If you have any further queries, please do not hesitate to contact us on the free call number 1800 640 501.

Regards,

Enquiries

**Public enquiry hours are 8.30am to 4.30pm**

**National Native Title Tribunal | Perth**

Facsimile (08) 9425 1193 | Email [enquiries@nntt.gov.au](mailto:enquiries@nntt.gov.au)

**Freecall 1800 640 501 | [www.nntt.gov.au](http://www.nntt.gov.au)**

*Shared Country Shared Future*

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**From:** [kyliemcd@heritageconnect.com.au](mailto:kyliemcd@heritageconnect.com.au) <[kyliemcd@heritageconnect.com.au](mailto:kyliemcd@heritageconnect.com.au)>

**Sent:** Thursday, 12 July 2018 7:06 PM

**To:** Enquiries <[Enquiries@nntt.gov.au](mailto:Enquiries@nntt.gov.au)>

**Subject:** SR4519 Follow up enquiry Greenwich Hospital Upgrade

Dear Sir/Madam,

I am writing to you to follow up a letter of notification and enquiry for the Aboriginal cultural heritage consultation for a proposed redevelopment of Greenwich Hospital, dated 22 June 2018. The deadline for this enquiry has now passed. I have attached a copy of the letter to this email; if you are aware of Aboriginal people or groups who you believe may wish to register an interest for consultation and who hold cultural knowledge relevant to this project area, could you please provide their contact details.

Thank you,

Kylie McDonald

Archaeologist

CULTURAL HERITAGE CONNECTIONS Pty Ltd

Mobile: 0414216156

**kyliemcd@heritageconnect.com.au**

---

**From:** Phillip Boney <Waarlan12@outlook.com>  
**Sent:** Monday, 16 July 2018 8:02 PM  
**To:** kyliemcd@heritageconnect.com.au

Hi Kylie,

Phil Boney/ Wailwan Aboriginal Digging Group here. I thank you for your invitation to register for the Greenwich Hospital project. Please feel free to send on any further information about this project and if successful I look forward to working with you. Thank you

With regards, Phil Boney  
Wailwan Aboriginal Digging Group



**DARUG LAND  
OBSERVATIONS PTY LTD  
ABN 27 602 765 453**

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EMAIL: DARUGLANDOBSERVATIONS@GMAIL.COM  
PO BOX 173 ULLADULLA NSW 2539  
MOBILE: 0413 687 279

3<sup>rd</sup> September, 2018

Vanessa Hardy  
Cultural Heritage Connections Pty Ltd  
PO Box 490  
DULWICH HILL NSW 2203

Email: [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)

Dear Vanessa,

**RE: GREENWICH HOSPITAL, 97-115 RIVER ROAD, GREENWICH**

Aboriginal Cultural Heritage Assessment: Project Information & Methodology

Darug Land Observations Pty Ltd has reviewed the project information and draft project methodology assessment, and supports the methodology for the proposed upgrades of Lot 3 & 4 DP 584287, located at Greenwich Hospital, 97-115 River Road, in Greenwich.

In relation to the long-term storage of recovered artefacts, if any, Darug Land Observations Pty Ltd strongly believes that recovered artefacts should be re-buried on Country (study area).

Furthermore, Darug Land Observations Pty Ltd would like to be involved in the Site meeting, Archaeological Test excavations and all other form of works to be carried out on the site.

Look forward to working with you on this project.

Yours sincerely,

Jamie Workman  
Darug Land Observations Pty Ltd

Uncle Gordon Workman  
Darug Elder

**vanessa@heritageconnect.com.au**

---

**From:** lilly carroll <didgengunawalclan@yahoo.com.au>  
**Sent:** Wednesday, 1 August 2018 8:08 PM  
**To:** vanessa@heritageconnect.com.au  
**Subject:** Re: Greenwich Hospital Redevelopment

Hi Vanessa,

DNC agrees with all proposals for this project , and look forward to working with you again

Kind regards  
Paul Boyd

[Sent from Yahoo Mail for iPhone](#)

On Tuesday, July 31, 2018, 4:41 pm, [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au) wrote:

You/your organisation has been registered as a Registered Aboriginal Party (RAP) for this project. Attached is the project information and draft methodology for assessment.

Please advise if you do not wish your details to be included on the list of RAPs to go to OEH & the Metropolitan LALC.

Kind regards,

Vanessa

**Vanessa Hardy** MAACAI M.ICOMOS MEIANZ

**Director & Principal Archaeologist**

**Mobile:** [0410 030 986](tel:0410030986)



**Cultural Heritage Connections Pty Ltd**



**vanessa@heritageconnect.com.au**

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**From:** Scott Franks <[scott@tocomwall.com.au](mailto:scott@tocomwall.com.au)>  
**Sent:** Monday, 3 September 2018 3:49 PM  
**To:** [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)  
**Subject:** Re: Greenwich Hospital site meeting

Vanessa,

Thank you for your email. After getting legal advice Tocomwall will not be reviewing any information or reports in a none payed capacity, could you please inform your client as Tocomwall will reject all reports formally via Oeh.

Regards  
Scott Franks

Consultant  
Tocomwall Pty Ltd  
[scott@tocomwall.com.au](mailto:scott@tocomwall.com.au)  
0404 171544

Sent from my iPhone

On 3 Sep 2018, at 3:39 pm, "[vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)" <[vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)> wrote:

Thanks for your response Scott,

Your concerns are noted.

We will continue to provide project information for review.

Kind regards,  
Vanessa

**Vanessa Hardy**  
**Director & Principal Archaeologist**  
**Mobile: 0410 030 986**

<image004.jpg>

**Cultural Heritage Connections Pty Ltd**  
PO Box 490  
Dulwich Hill NSW 2203  
phone: 02 9518 3421

<image005.jpg> *Cultural Heritage Connections acknowledges the Traditional Owners of Country on which we work and throughout Australia.  
We pay our respects to them, their culture and their Elders past, present and future.*

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**From:** Scott Franks <[scott@tocomwall.com.au](mailto:scott@tocomwall.com.au)>  
**Sent:** Monday, 3 September 2018 8:47 AM  
**To:** [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)  
**Subject:** Re: Greenwich Hospital site meeting  
**Importance:** High

Vanessa,

Thank you for the update,

As Tocomwall is a registered company and we have several insurances to protect this company and our staff Tocomwall will not be providing the following to any projects in an unpaid compacity.

- Field visit or surveys
- Report commenting
- Report writing

Whilst I appreciate you and your clients position all Methodologies and reports will be rejected but this company if our services are not paid for.

Regards  
Scott Franks

Native Title & Environmental Services Consultant

Tocomwall Pty Ltd  
PO Box 76  
CARINGBAH NSW 1495  
m: 0404 171544  
p: 02 9542 7714  
f: 02 9524 4146  
e: [scott@tocomwall.com.au](mailto:scott@tocomwall.com.au)  
[www.tocomwall.com.au](http://www.tocomwall.com.au)  
<image006.png>

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**From:** "[vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)" <[vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)>  
**Date:** Sunday, 2 September 2018 at 6:27 pm  
**Cc:** "[kyliemcd@heritageconnect.com.au](mailto:kyliemcd@heritageconnect.com.au)" <[kyliemcd@heritageconnect.com.au](mailto:kyliemcd@heritageconnect.com.au)>  
**Subject:** Greenwich Hospital site meeting

Dear Registered Aboriginal Party,

A reminder that the voluntary site meeting and inspection for the Greenwich Hospital project will take place on Wednesday morning (5<sup>th</sup> September).

Please RSVP by COB Monday 3<sup>rd</sup>, if you would like to attend.

Kind regards,  
Vanessa

**Vanessa Hardy** MAACAI M.ICOMOS MEIANZ  
**Director & Principal Archaeologist**

**vanessa@heritageconnect.com.au**

---

**From:** arika jalomaki <yulayculturalservices@gmail.com>  
**Sent:** Wednesday, 1 August 2018 11:17 AM  
**To:** vanessa@heritageconnect.com.au  
**Subject:** Re: Greenwich Hospital Redevelopment

Dear Vanessa

Yulay Cultural Services supports the methodology for this project. We look forward to working with you

Kind regards  
Arika

On Tuesday, July 31, 2018, <[vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)> wrote:

You/your organisation has been registered as a Registered Aboriginal Party (RAP) for this project. Attached is the project information and draft methodology for assessment.

Please advise if you do not wish your details to be included on the list of RAPs to go to OEH & the Metropolitan LALC.

Kind regards,

Vanessa

**Vanessa Hardy MAACAI M.ICOMOS MEIANZ**

**Director & Principal Archaeologist**

**Mobile: 0410 030 986**



**Cultural Heritage Connections Pty Ltd**

PO Box 490

Dulwich Hill NSW 2203

**From:** vanessa@heritageconnect.com.au  
**Sent:** Monday, 29 October 2018 11:19 AM  
**Subject:** Greenwich Hospital draft ACHA report & ATR  
**Attachments:** Greenwich hospital- ACHA draft report V2 for RAPs\_RS.pdf; Greenwich hospital- ATR draft report V1 for RAPs\_RS.pdf

Tracking:	Recipient	Read
	Scott Franks	Read: 29/10/2018 11:41 AM
	Jennifer Beale	Read: 29/10/2018 4:05 PM

Dear Registered Aboriginal Party,

Please find attached the draft reports for the Greenwich Hospital project.

As per step 4.4.3 of the OEH *Aboriginal cultural heritage consultation requirements for proponents 2010*, **please provide comments before c.o.b. 27/11/2018.**

Please let me know if you have any questions or require further information.

Kind regards,

Vanessa

**Vanessa Hardy** MAACAI M.ICOMOS MEIANZ  
**Director & Principal Archaeologist**  
**Mobile: 0410 030 986**



**Cultural Heritage Connections Pty Ltd**  
PO Box 490



**DARUG LAND  
OBSERVATIONS PTY LTD  
ABN 27 602 765 453**

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EMAIL: DARUGLANDOBSERVATIONS@GMAIL.COM  
PO BOX 173 ULLADULLA NSW 2539  
MOBILE: 0413 687 279

6<sup>th</sup> November, 2018

Vanessa Hardy  
Cultural Heritage Connections Pty Ltd  
PO Box 490  
DULWICH HILL NSW 2203

Email: [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)

Dear Vanessa,

**RE: GREENWICH HOSPITAL, 97-115 RIVER ROAD, GREENWICH**

Aboriginal Cultural Heritage Assessment & Archaeological Technical Report

Darug Land Observations Pty Ltd has reviewed the draft Aboriginal Cultural Heritage Assessment and draft Aboriginal Archaeological Technical Report, and supports the methodology for the proposed upgrades of Lot 3 & 4 DP 584287, located at Greenwich Hospital, 97-115 River Road, in Greenwich.

Furthermore, if any artefacts are recovered during the construction stages, we strongly believe that these recovered artefacts should be re-buried on Country (study area).

Yours sincerely,

Jamie Workman  
Darug Land Observations Pty Ltd

Uncle Gordon Workman  
Darug Elder

## **APPENDIX 4: FINALISED METHODOLOGY**

31/7/2018

Dear Registered Aboriginal Party,

**Re: Project information and draft project methodology for an Aboriginal cultural heritage assessment for the proposed Greenwich Hospital Upgrade**

Thank you for your interest in the above project. Your interest has been formally registered according to the requirements of the Office of Environment and Heritage's (OEH) *Aboriginal cultural heritage consultation requirements for proponents* (DECCW). We are writing to provide you, as one of the Registered Aboriginal Parties (RAPs) for the project, with information about the next stages of the assessment.

Cultural Heritage Connections (CHC) has been engaged by HamondCare to prepare an Aboriginal Cultural Heritage Assessment (ACHA), including an archaeological assessment, of the proposed upgrade. As a part of the project, CHC is undertaking consultation with Aboriginal people according to the Office of Environment and Heritage's (OEH) *Aboriginal cultural heritage consultation requirements for proponents* (DECCW). This letter provides project information and a draft methodology for assessment of the Aboriginal cultural heritage of the area as required in Sections 4.2 and 4.3 of the consultation requirements.

We are also obliged under Stage 4.1.5 to advise you that unless we are informed that you do not wish us to, we will forward your details on a list of RAPs to the Metropolitan LALC and OEH as required.

The purpose of Aboriginal community consultation is to:

- assist the proponent in understanding Aboriginal people's views and concerns (if any) about the project;
- provide Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project with the opportunity to participate in decision making about the management of their cultural heritage by providing the proponent information regarding cultural significance and feedback on management options;
- provide an opportunity for Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project to be involved in consultation so that information about cultural significance is provided to OEH to assist in decision making;
- understand cultural values present in the area; and



- assist the Director-General of OEH in his or her consideration of the determination of an Aboriginal Heritage Impact Permit application (if required).

## **Project Information & Impacts**

As part of Stage 4.2 of the consultation process, the following project information is presented to assist in meeting the aim of presenting details relevant to the nature, scope, methodology and environmental and other impacts of the proposed development. Further opportunity for presentation of project information will be provided during a site meeting as discussed below.

Greenwich Hospital is located at 97 – 115 River Road, Greenwich, the real property descriptions are Lot 3 and Lot 4 DP 584287. The site is roughly rectangular in shape and incorporates an area of approximately 3.376 hectares. The site has road frontages to River Road and St Vincent's Road.

The topography of the site rises towards the centre from the south-eastern and south-western property boundaries, with the south-western part of the site falling steeply away towards Gore Creek. On-site vegetation includes a mix of exotic species and remnant vegetation. The existing hospital footprint has been largely disturbed from past construction and consists predominantly of manicured lawns and garden plantings. The perimeter of the site is characterised by remnant vegetation that contributes to the character of the site and provides a visual buffer from surrounding areas.

Greenwich Hospital has operated from the site since 1966. The hospital is run by HammondCare and provides rehabilitation, palliative and supportive care, mental health care for older people, pain management, and other vital support services.

The proposed redevelopment of Greenwich Hospital has been designed to increase the service potential and amenity of the site. The proposal seeks to replace existing hospital accommodation with a campus of:

- 75 inpatient hospital beds, 15 palliative care beds and 60 residential aged care beds;
- Inpatient and outpatient support services and areas necessary to provide a modern, attractive health facility consistent with Hammond Care's high standard of care;
- 80 new seniors housing (apartments) addressing River Road;
- 9 new seniors housing (villas) addressing St Vincents Road;
- Pallister House will be retained and continue to fulfil its present functions;
- Approximately 329 total onsite car parking; and
- The removal of a right turn out manoeuvre from the unsignalised access on River Road.

Development activities with the potential to disturb the ground surface include:

- The demolition of existing buildings and structures on site (excluding Pallister House which will be retained in its current form)
- Earthworks including excavation;
- Some tree removal and replacement; and
- Other service and landscaping works.

The location of the site and an overview of the proposed works are detailed in the attached figures.

The project has been designated State Significant Development (SSD) 8699. The Secretary's environment assessment requirements (SEARs) require that 'where relevant' Aboriginal Cultural Heritage be assessed in accordance with the *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011) and *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

## **Assessment Background & Archaeological Context**

The study area is within the Harbour Foreshores physiographic region of the Sydney Basin immediately south of the Hornsby Plateau. The Sydney Basin is underlain by Triassic sediments, which dip gently from the east and north towards a central lowland situated south-west of Parramatta. As the basin rises to the north it is transacted by the drowned river valleys of the Parramatta and Georges Rivers. The action of these rivers has exposed the underlying Hawkesbury Sandstone and produced the 'rugged to undulating' valleys of the Harbour Foreshores physiographic region (Chapman and Murphy 1989).

Stone suitable for tool manufacture occurs across the Sydney Basin. Recorded artefacts have been made from silcrete, chert, 'indurated mudstone'/'silicified tuff', quartz, quartzite and basalt. Many of these materials can be commonly found as cobbles or boulders eroding out of deposits near creek lines.

Thousands of Aboriginal archaeological sites have been recorded across the Sydney region. The most common site types are rock shelters with midden deposit, rock shelters with art, rock art petroglyphs (often referred to as 'rock engravings') and open artefact scatters. These four site types have a frequency between the 15-20% of known sites. Less frequently recorded site types (5-15% frequency) include rock shelters with artefacts, grinding grooves and open middens (Wheeler 2004). Many of these site types are largely dependent on environmental factors for their occurrence. For example, shelter sites can only occur in areas of suitable sandstone overhangs.

Despite this, rock shelter sites are the most common site type in the region (Attenbrow 2002: 49). This is probably partly due to the greater preservation of material in a shelter context as well as the fact that many sandstone outcrop areas are in steep terrain that has remained undeveloped. Over a decade ago there were at least 840 rock platform sites and 875 rock shelter sites recorded across the greater Sydney area (Attenbrow 2002).

During the many thousands of years of Aboriginal occupation of the Sydney Basin numerous changes have occurred to climate and resources. Inevitably social alliances, groupings and occupation patterns would have also changed. Due to the differences in resources available for coastal and inland areas, it has been frequently assumed that hinterland and coastal groups had very different lifestyles; in summary, coastal people were 'fishers' and inland people were 'hunters'. This has not always been supported by evidence from archaeological excavations that suggests that coastal people also exploited a wide range of terrestrial resources and hinterland people had a variety of riverine resources available for use.

### **Local Context**

The *Port Jackson Archaeological Project* was undertaken in the early to mid-1990s partly because it was recognised that the archaeology of Port Jackson and surrounds was comparatively poorly documented (Attenbrow 1990). This is, to a large extent still the case compared to the extensive amount of work that has been carried out on the

adjacent Cumberland Plain. Relatively few excavations have been undertaken in the sandstone geology of Sydney Harbour and its associated rivers. Predictive site modelling for the Parramatta River and Lane Cove River surrounds has been limited due to the lack of detailed information. In general terms more sites have been recorded on sandstone geology than shale (Irish 2002: 21-22).

Attenbrow notes that the physical evidence of the activities of the Aboriginal inhabitants was noticed by the early non-indigenous settlers. Governor Phillip commented on the observations of rock engravings by exploration parties with the First Fleet and also ordered that the burial mounds along Middle Harbour be investigated (Attenbrow 1990: 1). The Port Jackson project investigated the distribution of shell middens throughout 8 'sub catchments' including the Lane Cove River. It was concluded that 98% of middens are on Hawkesbury sandstone geology. Most of the known sites occur on Council reserves or Crown Lands with only 8% on private or 'non-reserve' land. The highest density of sites was recorded in Middle Harbour. Over half (61%) of the midden sites and 80% of the archaeological deposits were located within rock shelters with over half of all sites occurring within ten metres of the high-water level. It was also acknowledged that some of these patterns might be due to the relative level of development on ridgelines as opposed to adjacent to the waterfront (Attenbrow 2002).

A landscape such as the study area would have provided access to a number of different resource zones; making it an attractive location for past occupation.

GML Heritage (2018) undertook an archaeological assessment of the site as part of the Environmental Impact Statement (EIS) for the redevelopment concept proposal.

As part of the assessment, a search of the OEH AHIMS database was undertaken. the search identified 36 registered sites within one kilometre of the project area. none of these sites was within the project area boundaries. The majority of sites were midden sites or shelters with midden material. Sites are strongly associated with water, either creek lines or the river front.

In addition, the following observations were made as part of the assessment:

- Multiple fig trees were identified within the project area. no evidence of Aboriginal modification was identified on the fig trees or any other trees in the project area.
- Sandstone outcrops were identified in the southern and eastern sections of the project area. No evidence of Aboriginal occupation, art or axe grinding grooves was identified on or near the outcrops. However low visibility reduced the effectiveness of survey in these areas.
- No Aboriginal objects were identified within the project area. however, low visibility reduced the effectiveness of the survey.
- The centre of the project area contains carparking and open lawns and has undergone less disturbance than built areas.
- The southwestern section of the project area has undergone earthworks including an inground swimming pool but has not been extensively built.
- The eastern section of the project area is the least developed, there are rock outcrops and mature trees in this area where the land slopes down to St Vincents Road.

The assessment concluded that some parts of the project area had potential to retain archaeological deposit and Aboriginal objects. Therefore, additional assessment was recommended.

## Draft Assessment Methodology

As part of Stage 4.3 of the consultation process, we invite RAPs to approach us with suggestions for appropriate collaboration methods.

As a minimum we are seeking to provide opportunity for RAPs to:

- contribute to culturally appropriate information gathering and the research methodology (this document);
- provide information that will enable the cultural significance of Aboriginal objects and/or places on the proposed project area to be determined; and
- have input into the development of any cultural heritage management options.

We will provide all RAPs with:

- opportunity to comment on this proposed project methodology (28 day review period of this document);
- opportunity to participate in a site inspection and meeting to discuss the proposed works and any cultural values;
- opportunity to comment on draft ACHA reports (28 day review period).

Parts of the project area are highly disturbed and have been subject to bulk earthworks. There is limited visibility of the natural ground surface in the disturbed locations, and in some areas topsoil has been removed entirely. Therefore, archaeological survey will be limited to the parts of the site where natural ground surface remains (largely closest to the northern and eastern boundaries).

The survey will involve walking the identified areas to observe ground conditions and potential for Aboriginal objects. Information recorded during the survey will include (but not necessarily be limited to): changes in landform elements, different types of surface exposures, previous land use and disturbance, natural features (e.g. stone outcrops), soils, erosion, ground surface visibility, and geomorphic activity following the requirements of the Archaeological Code of Practice (DECCW 2010)

Any known Aboriginal resources present will be recorded as well as any cultural information, information about the landscape or comments by Aboriginal representatives regarding significance. In addition, any comments made by Aboriginal stakeholders involved in the field survey on site locations, management of sites or cultural values of the project impact area will also be noted.

Any new sites or areas of archaeological potential will be recorded including all information required to complete an OEH AHIMS site card. Mapping and recording of all archaeological survey areas and all identified Aboriginal sites and/or areas of potential within the project impact will be undertaken using a hand held GPS and a digital camera.

In addition, an on-site meeting to coincide with the survey is proposed. It is proposed that the site meeting will include opportunities for registered Aboriginal parties (RAPs) to:

- review the project information and ask questions about the nature of the development and its impacts;
- discuss cultural knowledge for the study area;
- provide cultural information to identify:

- whether there are any Aboriginal objects of cultural value to Aboriginal people in the project area;
- whether there are any places of cultural value to Aboriginal people in the project area (whether they are Aboriginal places declared under s.84 of the NPW Act or not);
- consider places of social, spiritual and cultural value, historic places with cultural significance, and potential places/areas of historic, social, spiritual and/or cultural significance within the project area;
- express views on potential management options including ways to avoid or mitigate harm and/or conserve Aboriginal cultural heritage values; and
- consider how Aboriginal people can continue their association with identified Aboriginal heritage values.

Any comments by RAPs regarding significance as well as information about the landscape or cultural heritage management options will be noted for inclusion in the draft report. In addition, we can provide opportunities via telephone for RAPs to discuss and present information relating to the cultural values of the project area, views on ongoing heritage management for the project area as well as any other related issues.

This proposed assessment process will support the development of an ACHA including any areas of higher constraint that will require further analysis or will support any avoidance or mitigation strategies with respect to possible impacts to Aboriginal objects or other places of importance to the Aboriginal community. A copy of the draft ACHA will be sent to RAPs for comment prior to finalisation.

The information gathered during this process will be used to compile draft reports. The draft ACHA and archaeological reports will then be provided to RAPs for comment (a 28 day comment period will be provided).

#### *Culturally Sensitive/ Gender Sensitive Information*

We understand that there may be times where RAPs may have information about a project which is culturally or gender sensitive. If RAPs wish to provide cultural information which they do not want to be made public or which is gender sensitive, provision can be made to record this information as confidential as part of the reporting process but without inclusion in the public versions of the report. Female or male archaeologists can also be made available to record or discuss gender sensitive information during the life of the project, depending on the wishes of RAPs.

## **Response - Closing Date for Comments on Methodology**

Following OEH's ACHCRs, registered Aboriginal stakeholder groups for this project have a minimum of 28 days to review the draft survey strategy and project methodology for the ACHA and provide comment and input.

If you support the proposed methodology, could you please respond and indicate your interest in attending a site inspection. The inspection would be arranged shortly following the close of the review period. Alternatively, we would be interested in receiving other suggestions for a preferred way to approach the assessment.

Please provide your written or verbal by 30 August 2018.

Responses should be directed to:

Vanessa Hardy

email: [vanessa@heritageconnect.com.au](mailto:vanessa@heritageconnect.com.au)

or via post to

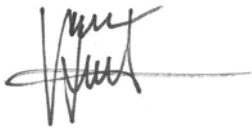
Cultural Heritage Connections

PO Box 490

Dulwich Hill NSW 2203

If you have any questions, would like to discuss this further or prefer to provide a response verbally, please contact me on 02 9518 3421 or 0410 030 986.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Vanessa Hardy', with a long horizontal stroke extending to the right.

Vanessa Hardy

Director & Archaeologist