

Reference: 25130

23 February 2026

Oliver McGeachie
Director
Sinclair Brook
Level 1, Martin Place
Sydney, New South Wales 2000

Dear Oliver,

**RE: ABORIGINAL CULTURAL HERITAGE DUE DILIGENCE ADVICE
FOR 40 STEWART STREET, ERMINGTON,
NEW SOUTH WALES**

Austral Archaeology Pty Ltd (Austral) has been engaged by Sinclair Brook (the Client) to provide a letter of Aboriginal Cultural Heritage Due Diligence Advice (ACHDDA).

This ACHDDA is submitted to the Department of Planning, Housing and Infrastructure (DPHI) on behalf of Wesley Mission (the Applicant), to support a State Significant Development Application (SSDA) for the redevelopment of the former Lottie Stewart Hospital, for the purpose of a seniors housing development at 40 Stewart Street, Ermington.

Under State Significant Development Declaration Order (No 11) 2025, dated 23 July 2025, the following development is declared to be State Significant Development:

(j) Development specified in EOI application 255387 dated 10 April 2025 including development for the purpose of retention of heritage items and seniors housing and provision of affordable housing at 40 Stewart Street, Ermington being Lot A/DP29480, Lot D/DP29480, Lot F/DP29480, Lot 2/DP574056.

Specifically, the proposed works include the following:

- Site preparation and early works, including demolition of existing structures;
- Torrens title lot amalgamation of the existing four (4) lots to create one (1) lot;
- Retention of the heritage building, part of the hospital building and other character elements;
- Construction and adaptive reuse of existing buildings for 6 x independent living unit buildings and a range of low-rise detached villas and duplex villas, delivering a total of 218 units;
- Adaptive reuse of the heritage item (Tebbutt Lodge) including conservation works and curtilage improvements with sympathetic new additions to facilitate the provision of communal facilities, communal and private outdoor open space, and wellness facilities;
- Removal of existing hardscape areas, retention of significant higher value soft landscaping, new landscaping (including tree removal) and public domain works; and
- Augmentation of physical infrastructure and utilities, as required.

For a detailed description of the proposed development, refer to the Environmental Impact Statement (EIS) prepared by Beam Planning, and the Architectural Drawings prepared by Integrated Design Group.

The study area is located at 40 Stewart Street, Ermington, within the City of Parramatta Local Government Area (LGA). It is legally identified as Lot A, D and F in DP29480 and Lot 2 in DP574056 and is approximately 4.647 hectares.

The site has a frontage of approximately 220 metres along Stewart Street, with 3 separate points for vehicular access. The study area is currently occupied by the former Lottie Stewart Hospital, which was then operated as a residential care facility, but ceased operation in 2012. The study area is primarily vacant and heavily underutilised. Local heritage item I166 'R E Tebbutt Lodge' is located within the study area. The location of the study area area is shown on Figure 1 and Figure 2.

This ACHDDA addresses the following relevant Secretary's Environmental Assessment Requirements (SEARs) set out in the table below.

Table 1 SEARs compliance table.

SEARs Request	Response
21. Aboriginal Cultural Heritage Where there is known, or reasonably likely, to be Aboriginal cultural heritage on or near the site demonstrate that impacts have been adequately investigated and assessed by: - Identifying that an appropriate prior planning process has already considered these impacts, e.g. a rezoning or development application, or - Providing an initial assessment of the potential impacts	The entirety of this ACHDDA demonstrates that an appropriate process has been undertaken with an initial assessment of potential impacts. The conclusions of this assessment indicate the proposed development will not have adverse impacts on Aboriginal cultural heritage items.

This advice is intended to assist the Applicant in determining their obligations with regard to the *National Parks and Wildlife Act 1974* (NPW Act), and to determine whether the project will involve activities that may harm Aboriginal objects or places. Section 87 of the NPW Act makes it a strict liability offence to knowingly or unknowingly harm Aboriginal objects or declared Aboriginal places without an Aboriginal Heritage Impact Permit (AHIP). Section 5 of the NPW Act defines harm as:

any act or omission that – (a) destroys, defaces or damages the object or place or (b) in relation to an object, moves the object from the land on which it had been situated.

The NPW Act allows for a person or organisation to exercise due diligence in determining whether their actions will, or are likely to, impact upon Aboriginal objects or places. Any person or organisation who can demonstrate that they have exercised due diligence has a defence against prosecution under the strict liability provisions of the NPW Act. Where an activity is likely to harm Aboriginal objects or places, consent in the form of an AHIP is required.

The *National Parks and Wildlife Regulation 2009* (since superseded by the *National Parks and Wildlife Regulation 2019* [NPW Regulation]) adopted the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (Department of Environment, Climate Change and Water NSW 2010) [the Code], which sets out the reasonable and practicable steps which individuals and organisations need to take in order to:

- Identify whether Aboriginal objects are, or are likely to be, present within the study area.
- If Aboriginal objects are, or are likely to be present, determine whether their activities are likely to cause harm.
- Determine whether further assessment or an AHIP application is required for the activity to proceed.

This advice has been formulated to provide a robust assessment that will identify whether Aboriginal objects or places are present, or are likely to be present, within the study area. This has been achieved by the completion of a desktop review and archaeological survey of the study area.

The Code provides a series of questions that clarify whether it is the applicable document for a given project. These questions are addressed in Table 2.

Table 2 Assessing the applicability of the Code to the proposed activity.

Question	Response
Is the activity a declared project under Part 3A of the <i>Environmental Planning & Assessment Act 1979</i> ?	No
Is the activity an exempt activity listed in the NPW Act or other legislation?	No
Will the activity involve harm that is trivial or negligible?	No
Is the activity in an Aboriginal place or are you already aware of Aboriginal objects on the land?	No
Is the activity a low impact activity for which there is a defence in the NPW Regulation?	No
Do you want to use an industry specific code of practice?	No
Do you wish to follow your own procedure?	No

As none of the questions outlined in Table 2 apply to the project, due diligence must be established through the Code; this consists of a series of 5 steps, outlined below.

STEP 1. WILL THE ACTIVITY DISTURB THE GROUND SURFACE OR ANY CULTURALLY MODIFIED TREES?

The proposed works entail excavation across the study area. As the activity will disturb the ground surface and/or any culturally modified trees, if present, consideration of steps 2a and 2b of the Code is required.

STEP 2A. SEARCH THE ABORIGINAL HERITAGE INFORMATION MANAGEMENT SYSTEM DATABASE AND USE ANY OTHER SOURCES OF INFORMATION OF WHICH YOU ARE ALREADY AWARE.

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) database was conducted on 21 January 2026 (Client service ID: 1084533). The search identified 60 Aboriginal archaeological sites within a 5 kilometre search area centred on the study area (Table 3 and Figure 3). None of these registered sites are located within the study area (Figure 3). The mapping coordinates recorded for these sites were checked for consistency with their descriptions and location on maps from Aboriginal heritage reports, if available. Where notable discrepancies occurred, these descriptions and maps were considered the determinant for site location.

Spatial information for this report is displayed using the GDA94 Datum. Where AHIMS site records were provided on a different datum, they were converted using standard functions in QGIS software.

Table 3 AHIMS sites identified within 5 kilometres of the study area.

Site Feature Type	Occurrence	Frequency (%)
Artefact	28	46.67
Potential Archaeological Deposit (PAD)	12	20.00
Artefact, Potential Archaeological Deposit (PAD)	4	6.67
Shell, Artefact	4	6.67
Art (Pigment or Engraved)	3	5.00
Shell	3	5.00
Artefact, Art (Pigment or Engraved)	3	5.00
Grinding Groove	2	3.33
Modified Tree (Carved or Scarred)	1	1.66
TOTAL	60	100

Of the 60 recorded sites, there is a total of 71 site features, either listed individually or in association with another site type. This analysis focuses on individual site types, rather than those recorded in conjunction with another site type. Artefact feature types dominate the dataset, with sites including artefacts accounting for 54.92% (n=39), PADs are the second most commonly recorded site feature, with this site feature accounting for 16.90% (n=12). Sites with shell feature type make up 9.85% (n=7), while art-related features total 6 occurrences (8.45%). Less frequently recorded are grinding grooves (n=2, 2.81%) and modified trees (n=1, 1.40%), indicating these feature types are comparatively rare within the sample.

A review of the reports held on the AHIMS database identified several archaeological studies which have been undertaken within/in the locality of the study area. These are summarised in Table 4.

Table 4 Archaeological studies undertaken in the vicinity of the study area.

Reference	Details
Attenbrow (1990)	This report focused on documenting and assessing Aboriginal archaeological sites in the Port Jackson catchment, in a heavily urbanised landscape where many sites had already been disturbed or destroyed. The report combined a review of earlier work with field survey and detailed recording, concentrating on shell middens and archaeological deposits (rather than rock art, which was already the subject of separate National Parks and Wildlife programs) to determine their condition, distribution, and research/excavation potential for a larger Stage II excavation program. The report notes that, when the project commenced (mid-1988), 437 Aboriginal sites were registered for the catchment, including large numbers of middens and deposits, alongside rock art, grinding grooves, burials and scarred trees, and it emphasises that all site types remain under ongoing pressure from development and recreation. Overall, the Aboriginal heritage outcome of Stage I is a catchment-wide baseline: what site types occur, where they are concentrated (particularly in foreshore/estuarine settings), how intact they are, what has impacted them, and which deposits still retain sufficient integrity and information value to justify targeted excavation and stronger management attention. In total, 112 midden/deposit sites were relocated and recorded (77 previously registered and 35 unregistered), a further 10 registered middens were searched for but not found (due to factors including confirmed destruction or probable burial/vegetation cover), and nine isolated stone artefacts were recorded in the western sub-catchments (Duck River, Upper Parramatta and Darling Mills).

Reference	Details
Australian Museum Business Services (2008)	The report for the Rosehill Recycled Water Scheme (Fairfield-Camellia) identifies Aboriginal cultural heritage risk primarily where the pipeline intersects creeklines and parklands, noting that these landforms can retain subsurface Aboriginal material even where surface evidence is absent. It records one known Aboriginal site immediately adjacent to the proposed corridor: AHIMS #45-5-3272 at Fairfield Park (between Prospect Creek and Honour Avenue), listed as an isolated artefact and PAD, and located near land subject to Native Title Claim NSD6061/98; because no site card was available, the report recommended a ground survey to confirm the PAD extent and its relationship to the trenching footprint. Based on local/regional patterns (with open camp/artefact scatters and isolated finds strongly associated with water sources), the assessment also identifies several additional areas of Aboriginal archaeological potential along watercourses. The report concludes that further Aboriginal heritage assessment should occur with a targeted ground survey and a specific assessment of AHIMS #45-5-3272.
Aboriginal Heritage Office (2011)	The City of Ryde Aboriginal Site Management Report undertook an AHIMS database search for the City of Ryde LGA (including a 1 km buffer), approximately 5 km south-east of the current study area, and identified 118 recorded entries; after resolving duplicate records, off-area records and poorly located cards, the report confirms 56 Aboriginal sites within the City of Ryde LGA. The sites are mapped and discussed by 3 management/geomorphic areas: Lane Cove River (26 sites) and Parramatta River (29 sites) contain most sites and are characterised by sandstone-related site types including rock shelters with deposits/PAD, shelters with midden, middens, engravings and grinding grooves, while the Central Plateau (1 site) (shale-dominated and heavily developed) contains only a single artefact scatter/isolated find, with other site types (e.g. scarred trees) considered unlikely to survive. The report rerecorded and updated site information for management purposes and introduced a local "RYDE-#" numbering system linked back to AHIMS numbers.
Comber Consultants (2021)	The Marsden High School ACHA, approximately 2 km south-east of the current study area, undertook an AHIMS database search identifying 1 registered site located immediately south of its study area, AHIMS 45-6-2309 (Ermington Public School), is recorded as a disturbed shell midden with artefacts (including red silcrete, quartz and chert) in proximity to a highly modified drainage line. Three survey units across the broader campus and creek corridor did not identify any Aboriginal objects on the ground surface, with the report noting that ground visibility and historic disturbance reduce the reliability of surface observations in parts of the study area. Notwithstanding the absence of surface finds, the report identifies portions of the study area as a PAD, particularly in areas adjacent to Archer Creek and on lower-disturbance landforms where sealed or modified ground surfaces may mask intact subsurface sediments. This area was to remain a Conservation Zone, and no further archaeological investigations were conducted.

Reference	Details
Austral Archaeology (2022)	An ACHDDA was conducted for 826 Victoria Road, Ryde, approximately 5 km south-east of the current study area, which comprised a desktop assessment and a systematic visual inspection. The assessment found the study area has been extensively disturbed and the natural landscape largely altered, meaning Aboriginal cultural material is unlikely to remain; if present, it would most likely occur as isolated artefacts (i.e. not <i>in situ</i>). During inspection, there was no visible natural ground surface or profile exposure due to existing construction (including substantial areas of hardstand/bitumen and built infrastructure), and the landform was observed to have been modified/flattened; accordingly, the archaeological potential was assessed as low, and no Aboriginal sites were identified. Based on these results, the report concluded that further assessment was not warranted and no further Aboriginal heritage investigations were required, subject to standard unexpected finds procedures.
EMM Consulting (2025)	The ACHA for the Melrose Park Public School upgrades, located approximately 3 km south-east of the current study area, identified a single Aboriginal site within the project area: MPPS-AS1 (AHIMS #45-6-4125), recorded as a discrete, low-density artefact scatter. The site was not visible during the survey and was identified through test excavation within a previously mapped PAD in the south-western/southern part of the school grounds, where 7 artefacts were recovered from a 1 m² area (5 silcrete, one quartz and one basalt) across 4 test pits. In total, 47 test pits were excavated, with cultural heritage only recovered from these 4 pits, all of which were located within 200 m of the Parramatta River. The desktop review also noted nearby recorded artefact scatters and shell midden sites, as well as an unregistered PAD (recorded by RPS in 2022) mapped across the western portion of the site, which was subsequently redefined as part of MPPS-AS1 based on the excavation results. MPPS-AS1 was assessed as being of low significance, and with no additional Aboriginal cultural material recovered, the report concludes there is a low risk of further Aboriginal objects occurring within the remaining construction footprint. Following the identification, the project design was revised to avoid the site curtilage, and the report specifies that no ground disturbance is to occur within the curtilage or within 10 m of it unless an AHIP is obtained.

Austral has also undertaken a review of information to identify whether the proposed works are within landscape features likely to contain Aboriginal objects. This includes an assessment of ethnographic information, soils, geology, landform, prior disturbances, and resource information pertinent to the study area. The outcome of this review is outlined in Table 5.

Table 5 Assessment of landscape features.

Information	Details
Ethnographic	Aboriginal people of the Eora language group are the traditional custodians of the region that the study area is located within. Eora country has been described as spanning from Port Jackson to Botany Bay, and inland to Parramatta, however, it has also been described as extending as far north as Broken Bay (Attenbrow 2003; Carney and Vasilakis 2017). The name 'Eora' stems from the traditional word for 'people', 'here' or 'this place' (Attenbrow 2003; Heiss and Gibson 2013). David Collins, deputy judge advocate of the British Marines in the late 18th century, claims that Bennillong, a local Eora man, when asked where his people came from, replied that they: <i>... came from the clouds; and when they died, they return to the clouds</i> (Collins 1798) in (Attenbrow 2003:35). Eora land is generally acknowledged to encompass the coastal areas of Sydney, whereas Darug land is thought to cover the inland area of Sydney from Parramatta to the Blue Mountains (Heiss and Gibson 2013). Neighbouring Aboriginal groups include the Darkinjung, the Gandangara and the Tharawal, and movement in adjacent territories was permissible under certain circumstances (Tindale 1974). The Wallumedegal clan of the Eora are the traditional custodians. The Wallumedegal people lived as fisher-hunter-gatherers within 'river flats, mangrove swamps, and creeks' (Smith 2005:1). The clan would have fished with 'pronged spears and handlines', gathered shellfish and bushfood, and hunted birds (Smith 2005:1). The estuaries and lagoons of the Sydney Basin would have been crowded with local people fishing and gathering bushfood within their bark canoes (Smith 2005). These bark canoes would have been formed from the bark of stringybark trees (<i>Eucalyptus obliqua</i>) or fir trees (<i>Casuarina</i> spp.) [Smith 2005]. Fishing from these bark canoes with hand lines was often a woman's task, whereas the men would have speared fish while standing in shallow waters (Smith 2005). Small campfires were often built on a bed of seaweed within the canoes, and the game caught were cooked and eaten while travelling along the rivers (Smith 2005). Other cultural activities would have included camping, ceremonies, and the production of tools from raw materials including stone, bark, resin, shell, bone, and reeds. Some of these activities would have been performed within the vicinity of the study area. Despite the area once being well-populated, the introduction of western diseases, displacement of the Eora people, and other Aboriginal groups populating the NSW coast, from their lands, and the withdrawal of access to resources for survival saw the decimation of the local Aboriginal populations by the beginning of the 19th century (Smith 2005).
Soils	The study area is situated entirely within the Glenorie (gn) soil landscape, which consists of undulating to rolling low hills within the Wianamatta Group shales. The landscape consists of the following soil types: • gn1 – friable dark brown loam • gn2 – hardsetting brown clay loam • gn3 - whole-coloured, reddish brown, strongly pedal clay • gn4 – mottled grey plastic clay • gn5 – brownish-grey plastic silty clay The Glenorie soil landscape is associated with high soil erosion and is generally described as impermeable. Artefacts are therefore unlikely to be located within their original context due to a higher potential was movement via rainfall and instability of the soil profile (Department of Planning, Industry and Environment 2020). An outline of soil landscape boundaries in relation to the study area is provided in Figure 4.

Information	Details
Geology	The study area lies within the Cumberland Plain, which is a broad, shallow basin that stretches westwards from Parramatta to the Hawkesbury-Nepean River and southwards from Windsor to Thirlmere. The study area is underlain by the Wianamatta group of shale, which is characterised as plateau surfaces and ridgetops with gentle undulating rises (Chapman, G et al. 2009). The Ashfield shales, characterised by ridges, lie below the Bringelly shale formation and are separated by the Minchinbury sandstone. It consists of laminate and dark grey siltstone. The Ashfield Shales are described as black to dark-grey shale and laminate, and Bringelly Shales contain shale, carbonaceous claystone, laminate, fine- to medium-grained lithic sandstone and rare coal (Herbert 1983).
Hydrology	Ponds Creek is located approximately 450 north of the study area. Ponds Creek is a small waterway corridor running through Dundas Valley, forming part of a creek network that flows from Carlingford through the valley to Rydalmere, where it joins Subiaco Creek and continues toward the Parramatta River. The creek was originally a series of swamps, soaks and ponds; however, farming and urban development have significantly changed the ecology and geomorphology of the area from its pre-European settlement state (Finlay and Senior 2019). An overview of geological and hydrological systems in the vicinity of the study area is provided in Figure 5.
Landform	The majority of the study area is located on a slope landform (Figure 6); however, the landforms present within the study area have largely been altered through past construction.
Flora	The area was originally characterised by a tall open wet sclerophyll forest dominated by Sydney blue gum (<i>Eucalyptus saligna</i>) and blackbutt (<i>E. pilularis</i>), with other canopy species including turpentine (<i>Syncarpia glomulifera</i>), grey ironbark (<i>E. paniculata</i>), white stringybark (<i>E. globoidea</i>) and rough-barked apple (<i>Angophora floribunda</i>). The understorey commonly featured species such as pittosporum (<i>Pittosporum undulatum</i>) and coffee bush (<i>Breynia oblongifolia</i>). Much of this native vegetation has since been extensively cleared, with remnants largely limited to mature trees retained within residential neighbourhoods (Chapman, G et al. 2009).

Information	Details
Prior Disturbance	The study area forms part of Sir Frederick Stewart's former Dundas property. Historical aerial imagery from 1943 (Figure 7) shows the study area and surrounding land had been cleared of native vegetation and was used for farming, with the study area itself functioning as a vineyard. Buildings were present in the north-east corner, while the remainder of the area was planted with vines. In the mid-1940s, portions of the property were donated by Sir Frederick Stewart to the Central Methodist Mission to establish a hospital for chronic and incurable patients. Planning and design for the Stewart Memorial Hospital commenced in 1945, led by architect W McPherson in collaboration with NSW Government Architect, Cobden Parkes, and it incorporated the earlier St Cloud residence as a nurse's home with additions. The hospital was registered in August 1945 and designed as two 20-bed ward blocks with a central administration block, with staged expansion proposed to accommodate up to 80 beds; the facility was progressively extended over subsequent decades in line with the original scheme (Sinclair Brook 2025:6). By 1961 (Figure 8), the main hospital building had been established, along with a tennis court (centre-north), auxiliary buildings, driveways and maintained gardens, while the eastern portion and a small section of the southern area remained undeveloped. By 1976, the first stage of RE Tebbutt Lodge had opened, with a second stage completed in 1979 to support the Wesley Mission, and the building was later listed as a heritage item under the Parramatta LEP 2011 (Sinclair Brook 2025:6). By 2002 (Figure 9) additional auxiliary buildings and sealed driveways had been constructed, and the tennis court removed, although the eastern portion and a small section of the southern area remained undeveloped; broader urban development in the form of housing, roadways and infrastructure had also intensified around the study area. The hospital, later known as Lottie Stewart Hospital, ultimately ceased operating in 2013, and the study area is now dominated by derelict hospital buildings and associated managed gardens.

Based upon the results of these background studies Austral has been able to develop a series of predictive statements regarding the type and character of Aboriginal cultural heritage sites likely to exist within the study area, and where these are more likely to be located. These predictive statements indicate that:

- Archaeological sites occur on most landforms.
- Site frequency and density are dependent on their location in the landscape.
- Artefact scatters are commonly located in close proximity to permanent water sources, along creek banks, alluvial flats, and low slopes. More complex sites are usually located close to major water sources.
- Aboriginal objects are unlikely across the highly modified portions of the study area, particularly within and immediately surrounding former hospital buildings, internal roads, car parks, sealed surfaces, service corridors and landscaped terraces, where ground disturbance is likely to have removed or displaced any archaeological material.
- While surface artefact scatters may indicate the presence of subsurface archaeological deposits, surface artefact distribution and density may not accurately reflect those of subsurface archaeological deposits.
- The undisturbed area to the east and the less disturbed section to the south represent areas with the highest Aboriginal archaeological potential within the study area, as these areas are most likely to retain intact soil profiles and original ground surfaces capable of containing Aboriginal objects *in situ*.

- If Aboriginal cultural material occurs within the study area, it is most likely to comprise stone artefacts as isolated finds or low-density scatters, consistent with the dominant Aboriginal site types recorded in the broader locality.
- The most likely context for any material within the eastern and southern portions is subsurface rather than surface, given limited ground surface visibility across disturbed areas and the likelihood of grassed cover even in less modified areas.
- Where Aboriginal objects survive within the study area, they are more likely to be *in situ* in the eastern and southern portions, while any objects elsewhere on site are more likely to be redeposited within fill or disturbed soils.
- While the study area is not within 200 m of mapped 'waters' for the purpose of the Due Diligence Code checklist, it sits within a broader creek network associated with Ponds Creek and downstream connections toward the Parramatta River, meaning low-density artefact deposition remains possible in less disturbed ground.
- Culturally modified trees are possible but unlikely within the study area, noting that modified trees are rare within the 5 kilometre dataset and no scarred trees were observed during the inspection.

STEP 2B. ACTIVITIES IN AREAS WHERE LANDSCAPE FEATURES INDICATE THE PRESENCE OF ABORIGINAL OBJECTS.

The following table considers whether the study area is located in a landscape which is likely to be conducive to use of the area by Aboriginal people.

Table 6 Presence of sensitive landscape features listed in the Code.

Question	Response
Is the activity within 200m of 'waters'?	No
Is the activity within a sand dune system?	No
Is the activity located on a ridge top, ridge line or headland?	No
Is the activity located within 200m below or above a cliff face?	No
Is the activity within 20m of or in a cave, rock shelter or cave mouth?	No
Is the activity (or any part of it) on land that is disturbed?	Yes
Do the predictive statements of Step 2A indicate Aboriginal objects or places are likely to occur on any of the topographic elements of the activity area?	No

Although the study area is not within 200 metres of 'waters' and is largely disturbed, the AHIMS search results and disturbance mapping indicate Aboriginal objects remain possible within the less disturbed eastern extent and a section of the southern portion, where intact subsurface deposits are most likely to be retained.

STEP 3. CAN YOU AVOID HARM TO THE OBJECT OR DISTURBANCE OF THE LANDSCAPE FEATURE?

No Aboriginal objects or relevant landscape features were identified within the study area during the due diligence assessment. As a result, the proposed works will not harm any known Aboriginal objects or disturb any identified landscape features.

STEP 4. DESKTOP ASSESSMENT AND VISUAL INSPECTION.

To ground truth the desktop assessment, a visual inspection of the study area was undertaken on 23 January 2026 by Luke Jarvis (Archaeologist, Austral). The visual inspection consisted of a systematic survey of the study area to identify and record any Aboriginal archaeological sites visible on the surface or areas of Aboriginal archaeological potential and cultural sensitivity. The archaeological survey was conducted on foot. The methods used during the visual inspection conformed to requirements 5 to 8 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (Department of Environment, Climate Change and Water NSW 2010).

The visual inspection found that the study area is dominated by derelict hospital buildings and associated managed gardens, with the survey commencing from the main road access off Stewart Street.

Brick buildings, internal roads, pathways, and extensive areas of concrete and gravel car parks occur throughout the study area, and the ground surface has been widely and heavily modified. The landforms present within the study area have largely been altered through past construction, with limited ground surface visibility (GSV) across areas of previous disturbance (Figure 10 to Figure 15).

Native grasses and vegetation were observed only in small, localised patches around buildings and within a narrow strip adjacent to Stewart Street. A comparatively less modified area was identified at the eastern extent of the study area, comprising open, cleared parkland with a gradual slope trending southward (Figure 16 and Figure 18).

No Aboriginal artefacts or modified scarred trees were identified during the visual inspection.

STEP 5. FURTHER INVESTIGATIONS AND IMPACT ASSESSMENT.

Based upon the outcome of steps 1 to 4 of the code, further assessment is not warranted based on the history of disturbance, absence of appropriate landforms and geological features.

The following recommendations apply:

1. No further assessment or works are required to be undertaken for the study area in regard to Aboriginal cultural material and therefore, the proposed works may proceed with caution. If during the project, unexpected finds or human remains, please follow recommendation 2.
2. All Aboriginal objects and Places are protected under the NPW Act. It is an offence to knowingly disturb an Aboriginal site without a consent permit issued by Heritage NSW. Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity, and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object, the archaeologist will provide further recommendations. These may include notifying Heritage NSW and Aboriginal stakeholders.
3. Aboriginal ancestral remains may be found in a variety of landscapes in NSW, including middens and sandy or soft sedimentary soils. If any suspected human remains are discovered during any activity, you must:
 - a. Immediately cease all works at that location and not further move or disturb the remains.
 - b. Notify the NSW Police and Heritage NSW's Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
 - c. Do not recommence work at that location unless authorised in writing by Heritage NSW.

If you have any questions regarding the advice within this letter, please do not hesitate to contact me on the details below.

Yours sincerely,



Crystal Wooding

Archaeologist

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REFERENCES

Aboriginal Heritage Office 2011 City of Ryde Aboriginal Site Management Report. Aboriginal Site Management Report.

Attenbrow, V. 1990 The Port Jackson Archaeological Project: Report on Stage 1. p.69.

Attenbrow, V. 2003 *Sydney's Aboriginal Past: Investigating the Archaeological and Historical Records*. Australia: University of New South Wales Press Ltd.

Austral Archaeology 2022 826 Victoria Road, Ryde, NSW ACHDDA. p.21.

Australian Museum Business Services 2008 Rosehill Recycled Water Scheme Preliminary Cultural Heritage Assessment. p.44.

Carney, M. and S. Vasilakis 2017 Archaeological Monitoring & Recording: Service Works 1-63 Windmill Street, Millers Point NSW. Archaeological Management & Consulting Group.

Chapman, G et al. 2009 Soil Landscapes of the Sydney 1:100,000 Sheet Map. Department of Environment, Climate Change and Water, Sydney.

Collins, D. 1798 *An Account of the English Colony in New South Wales*. London.

Comber Consultants 2021 Marsden High School: ACHA. p.24.

Department of Environment, Climate Change and Water NSW 2010 *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. Department of Environment, Climate Change and Water NSW.

Department of Planning, Industry and Environment 2020 Soil Landscapes of Central and Eastern NSW V2.1. Sydney, N.S.W., Department of Planning, Industry and Environment.

EMM Consulting 2025 Upgrades to Melrose Park Public School, Melrose Park, NSW ACHA. p.10.

Finlay, C. and D. Senior 2019 Dundas and Dundas Valley - A Brief History. History and Heritage City of Parramatta. Local Government. Retrieved < <https://historyandheritage.cityofparramatta.nsw.gov.au/research-topics/suburbs/dundas-and-dundas-valley-brief-history> >.

Heiss, A. and M. Gibson 2013 Aboriginal People and Place. Barani: Sydney's Aboriginal History. Retrieved 1 July 2022 < <https://www.sydneybarani.com.au/sites/aboriginal-people-and-place/> >.

Herbert, C. 1983 *Sydney 1:100 000 Geological Sheet 9130*. 1st Edition.

Sinclair Brook 2025 Lottie Stewart Site: Retirement Village Development: Development Brief. p.18.

Smith, K.V. 2005 Wallumedegal: An Aboriginal History of Ryde. City of Ryde.

Tindale, N. 1974 *Aboriginal Tribes of Australia*. Canberra: Australian National University.

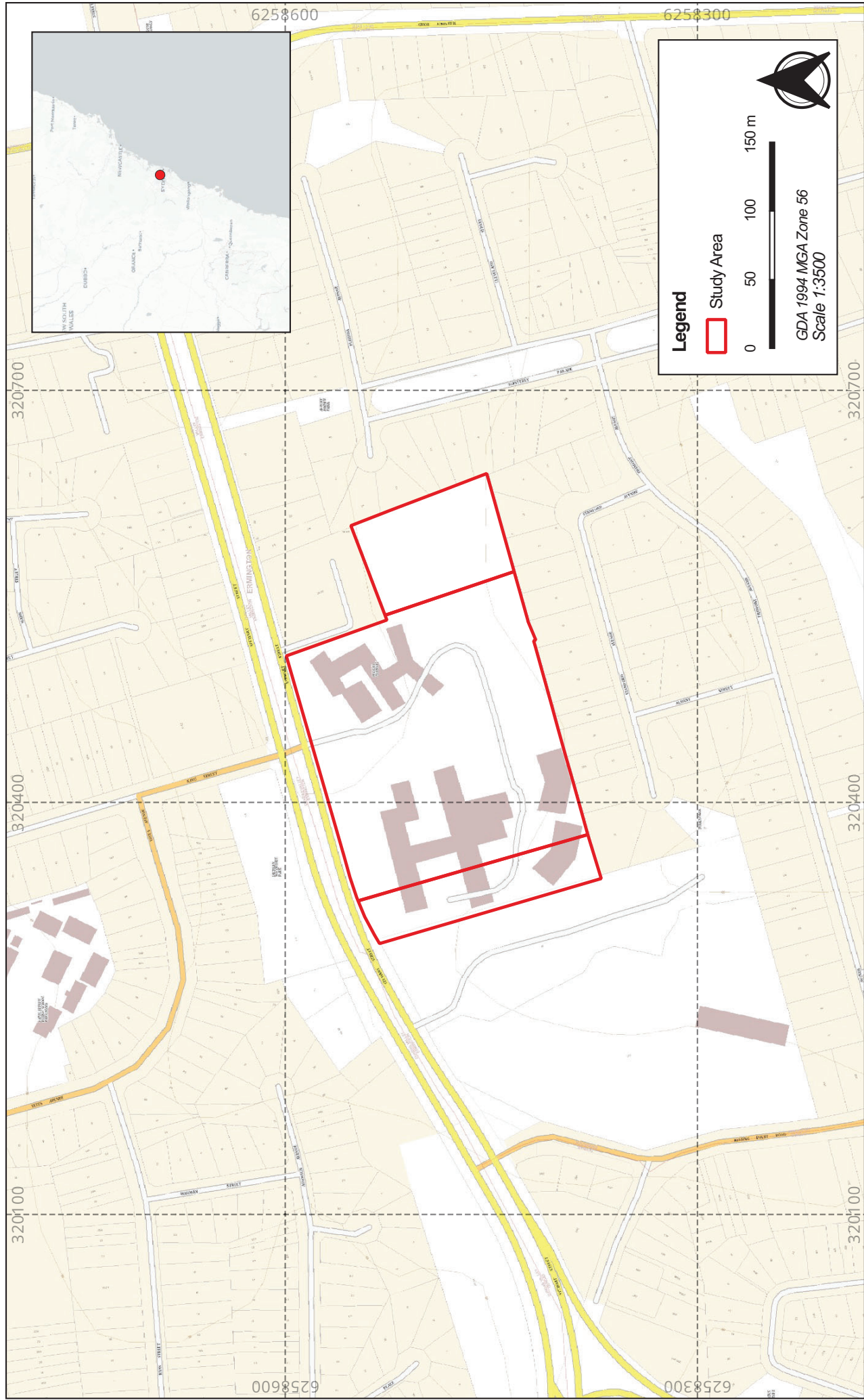


Figure 1 - Location of the study area
25130 40 Stewart Street, Ermington
Source: NSW LPI Basemap, CartoDB Positron

Drawn by: PB Date: 2026-02-19



Figure 2 - Detailed aerial imagery of the study area

25130 40 Stewart Street, Ermington

Source: NSW LPI Aerial, CartoDB Positron

Drawn by: PB Date: 2026-02-19

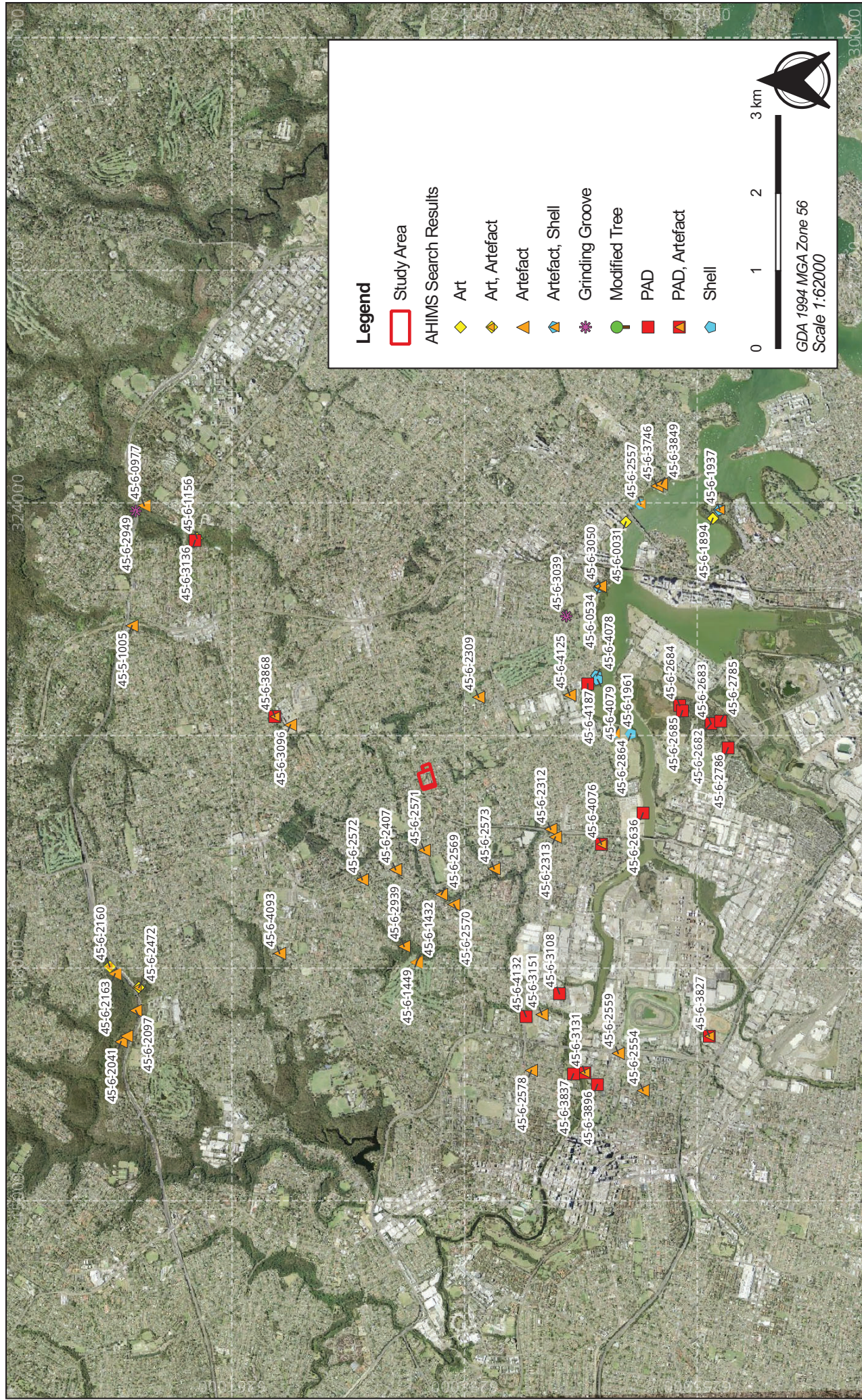


Figure 3 - AHIMS sites within 5 km to the study

25130 40 Stewart Street, Ermington

Source: NSW LPI Aerial

Drawn by: PB Date: 2026-01-27

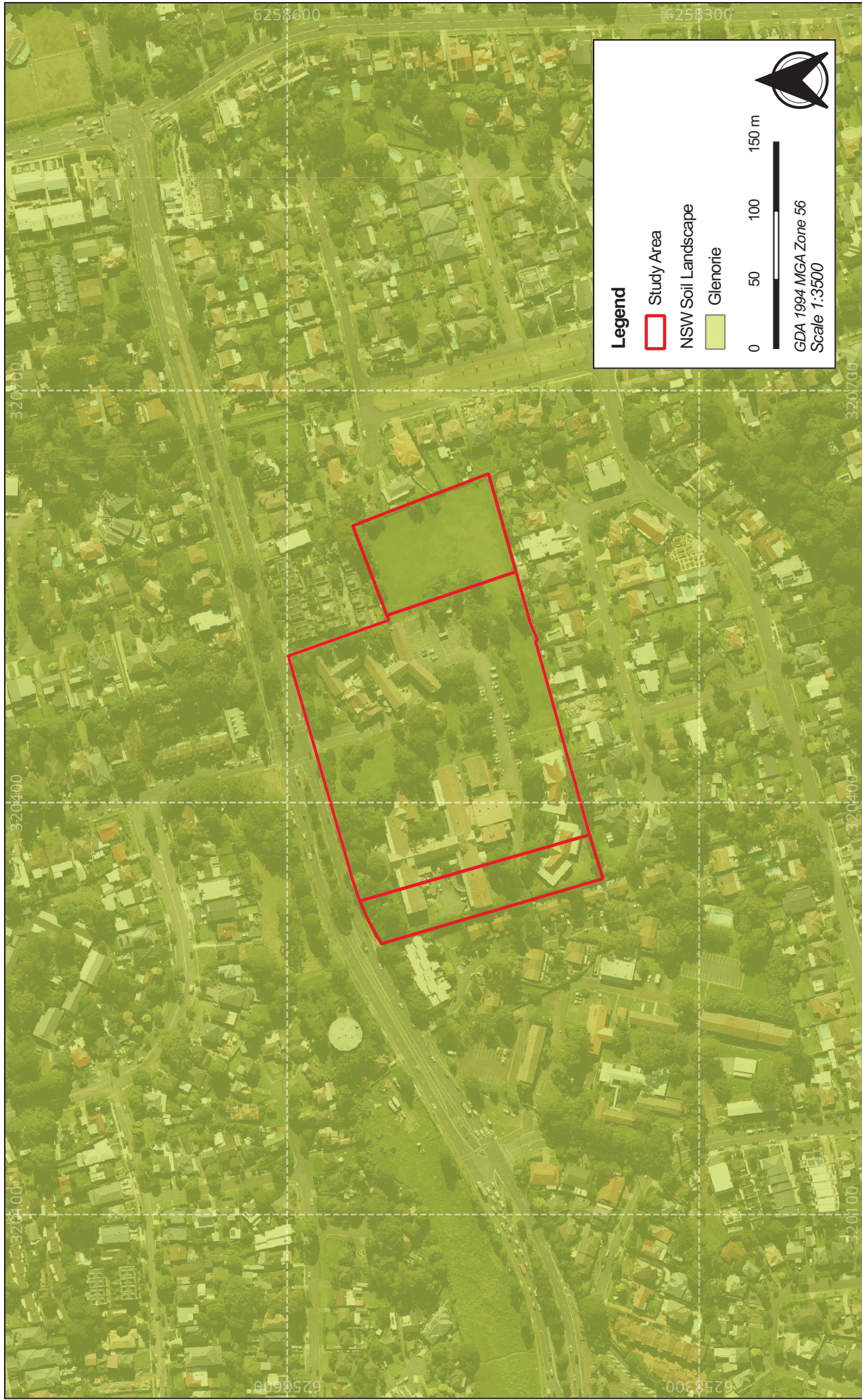


Figure 4 - Soil landscape of the study area
25130 40 Stewart Street, Ermington

Source: NSW LPI Aerial

Drawn by: PB Date: 2026-02-17

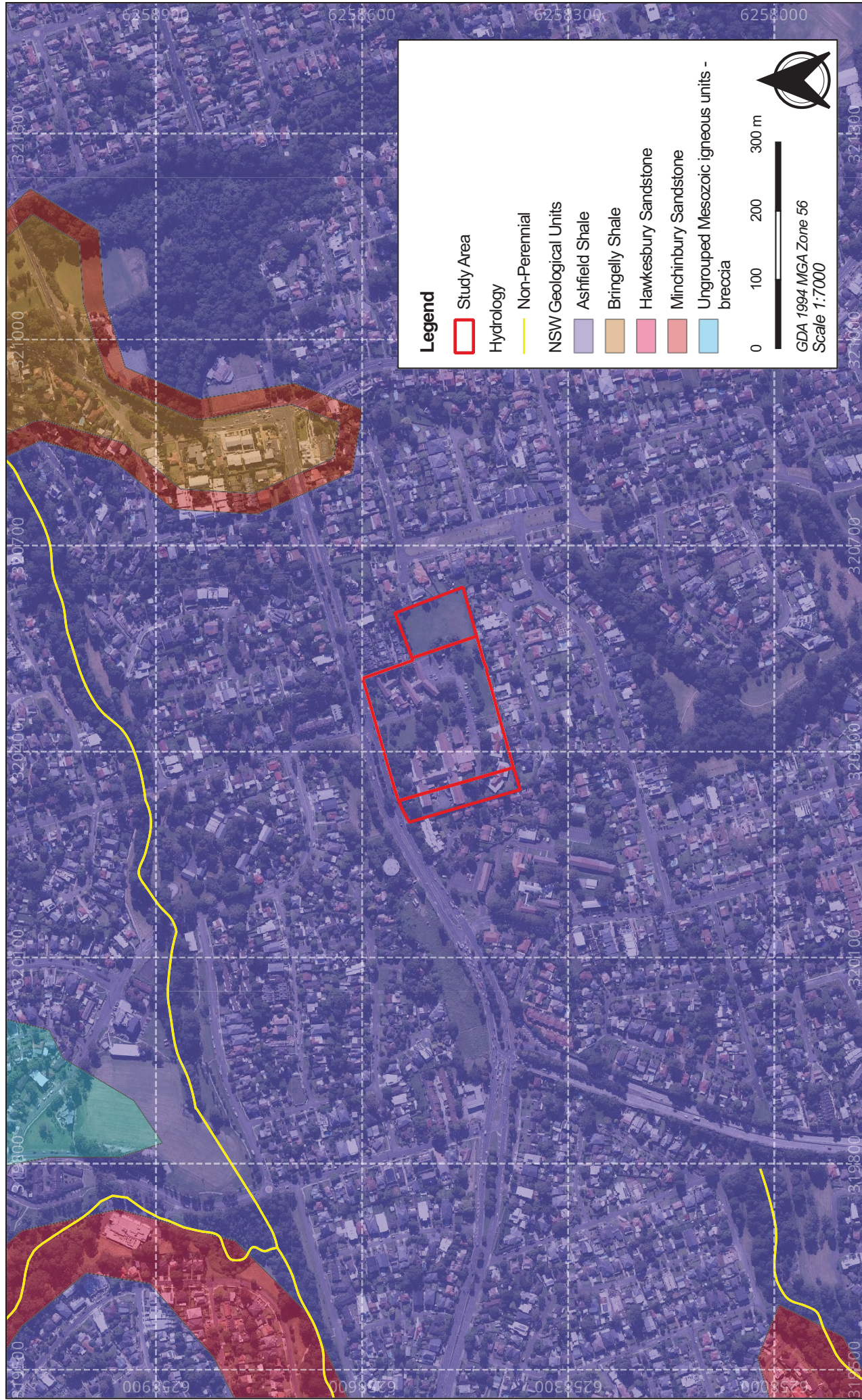


Figure 5 - Geology and hydrology of the study area

25130 40 Stewart Street, Ermington

Source: NSW LPI Aerial

Drawn by: PB Date: 2026-02-17

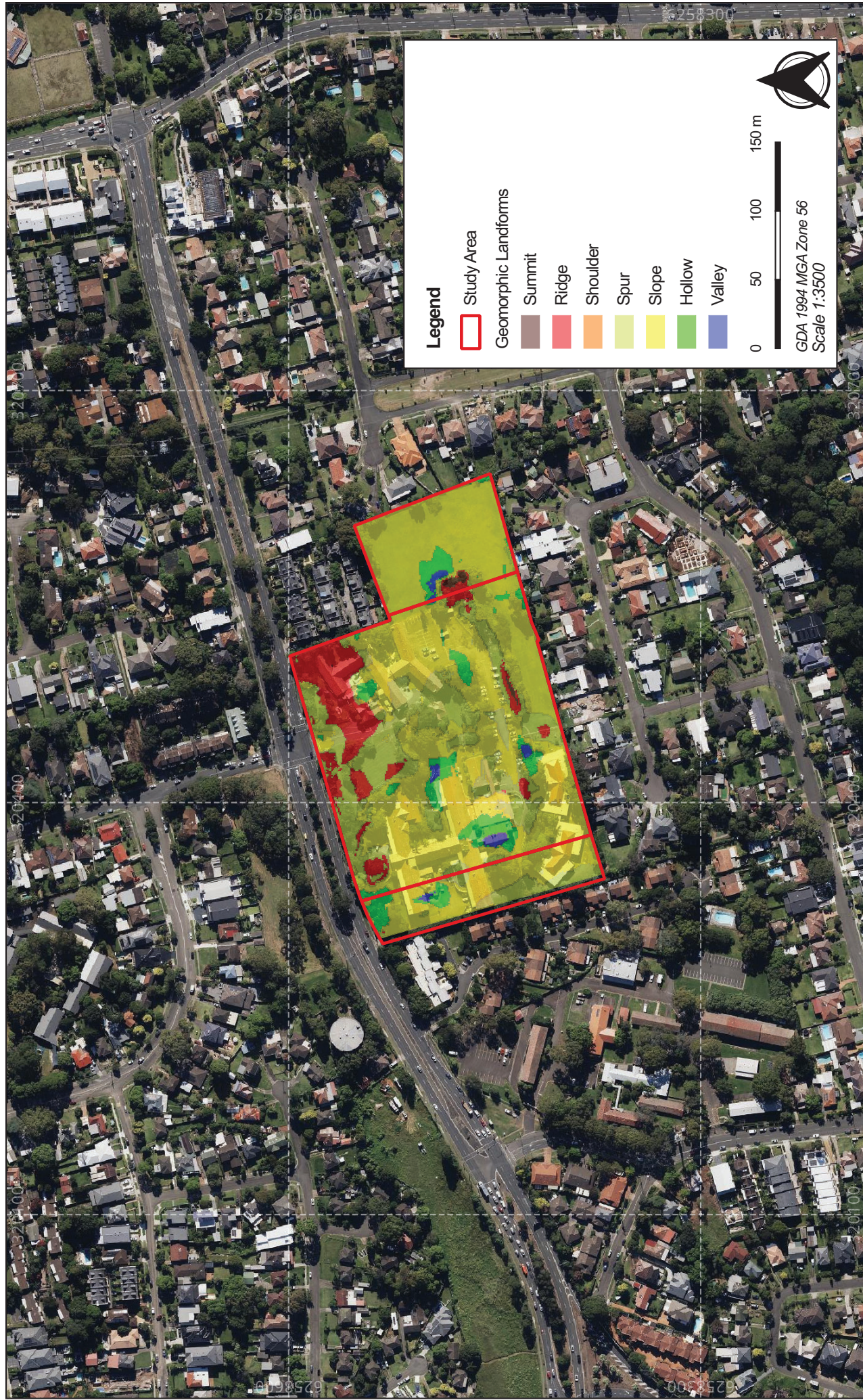


Figure 6 - Landform units of the study area

25130 40 Stewart Street, Ermington

Source: NSW LPI Aerial

Drawn by: PB Date: 2026-02-17

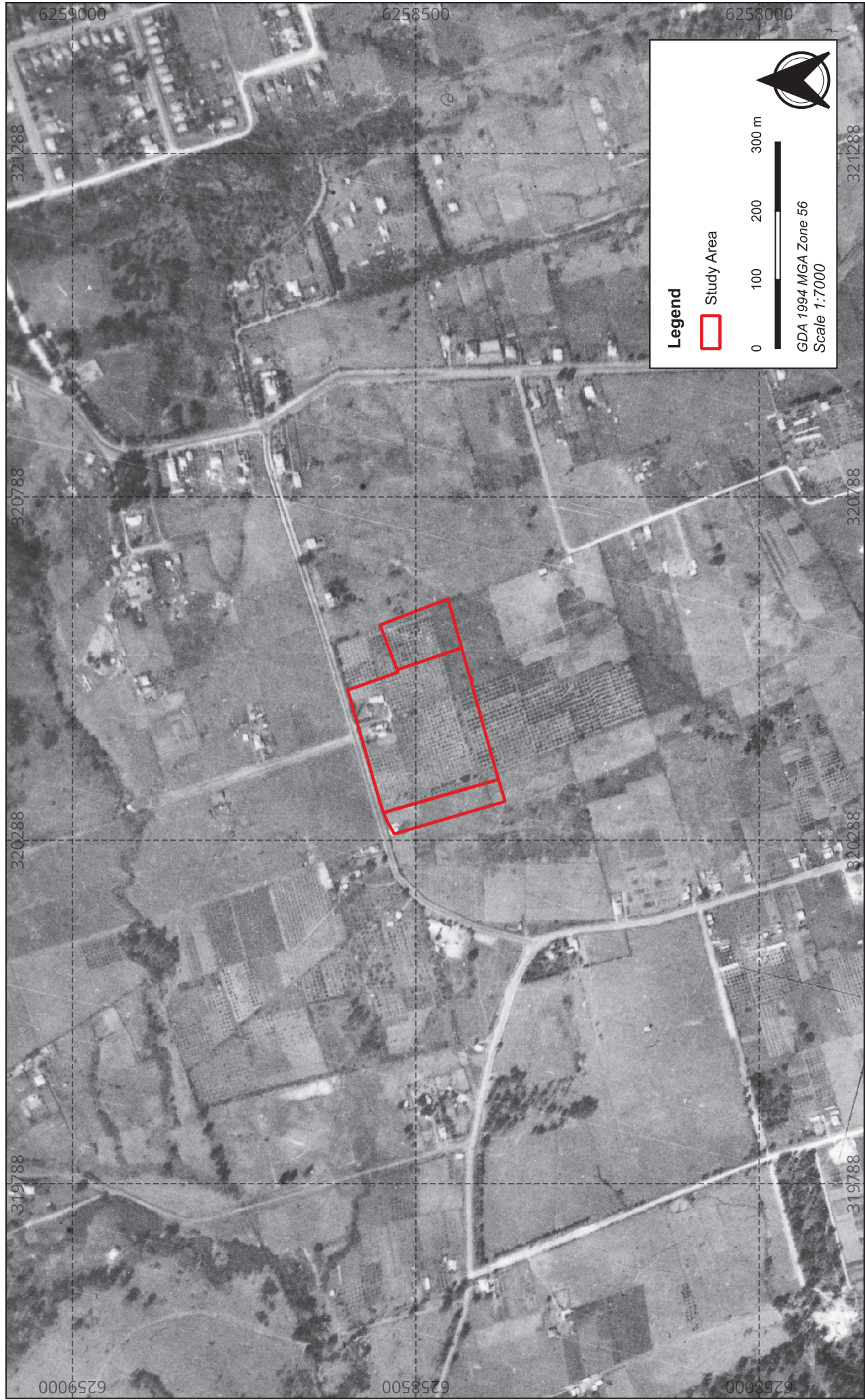


Figure 7 - 1943 Historical aerial of the study area

25130 40 Stewart Street, Ermington

Source: NSW Spatial Services

Drawn by: PB Date: 2026-02-19

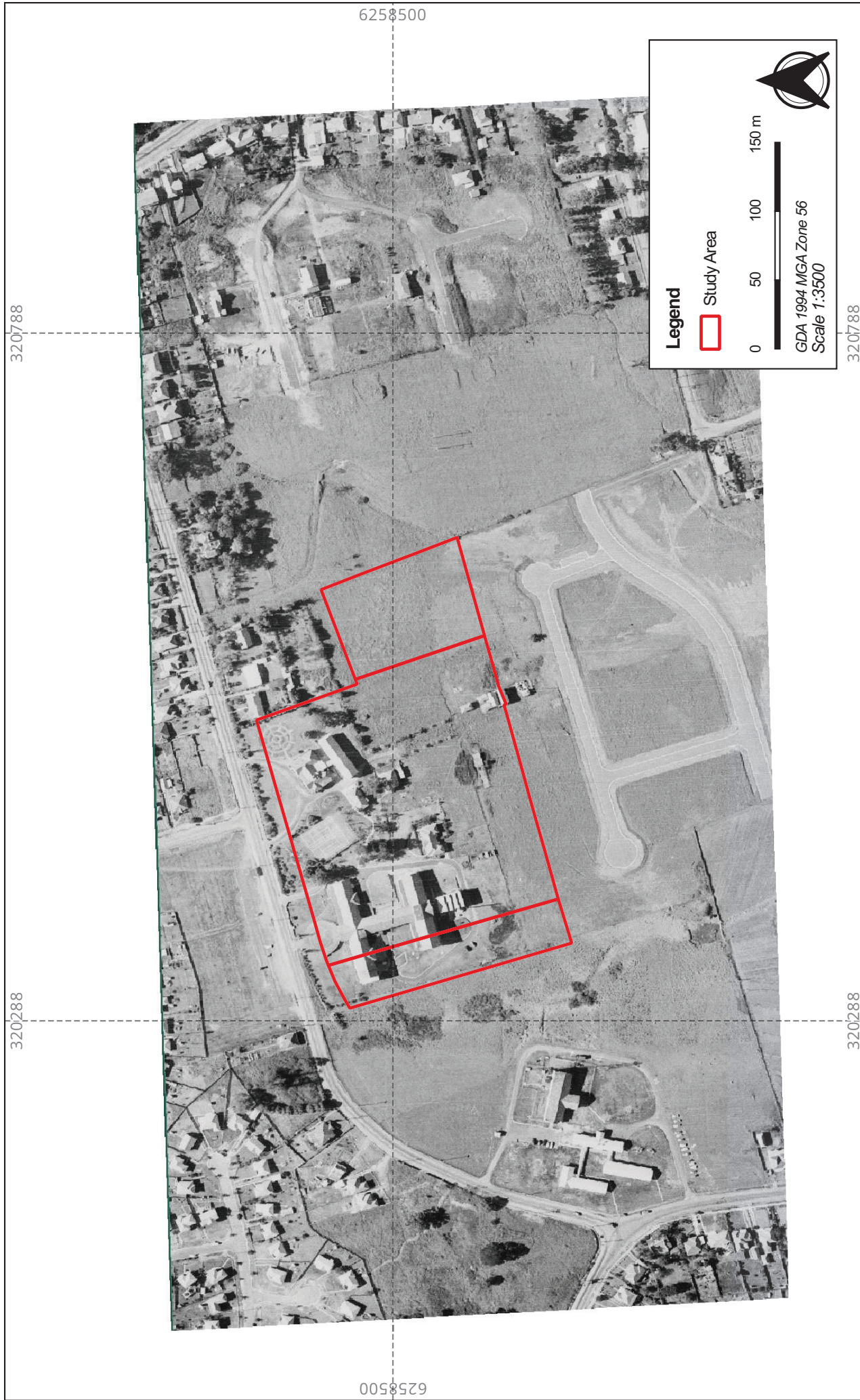


Figure 8 - 1961 Historical aerial of the study area

25130 40 Stewart Street, Ermington

Source: NSW Spatial Services

Drawn by: PB Date: 2026-02-19



Figure 9 - 2002 Historical aerial of the study area

25130 40 Stewart Street, Ermington

Source: NSW Spatial Services

Drawn by: PB Date: 2026-02-19



Figure 10 Hospital entrance, image displaying the disturbed context.

Note: south-west facing; scale: 2 metres; source: Austral.



Figure 11 Hospital carpark, westside. Image displaying the disturbed context.

Note: south-east facing; scale: 2 metres; source: Austral.



Figure 12 Image displaying disturbed context and modified landform.

Note: east facing; scale: 2 metres; source: Austral.



Figure 13 Garden adjacent to Stewart Street.

Note: west facing; scale: 2 metres; source: Austral.



Figure 14 Grass court (potentially the original tennis court).
Note: north-west facing; scale: 2 metres; source: Austral.



Figure 15 Tebbutt Lodge carpark extension. Imagine showing the disturbed context.
Note: west facing; source: Austral.



Figure 16 Open green space, eastern portion of the study area.

Note: west facing; scale: 2 metres; source: Austral.



Figure 17 Open green space, southern boundary looking towards the eastern portion of the study area.

Note: north-east facing; scale: 2 metres source: Austral.



Figure 18 **Open green space, southern boundary.**

Note: west facing; scale: 2 metres; source: Austral.