



Aboriginal Cultural Heritage Assessment Final

February 2026

Prepared for: Mosman Land No.1 Pty Ltd

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Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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Glossary

Term	Definition
Aboriginal ceremony and dreaming site	Previously referred to as mythological sites, these are spiritual/story places where no physical evidence of previous use of the place may occur, e.g. natural unmodified landscape features, ceremonial or spiritual areas, men's/women's sites, dreaming (creation) tracks, marriage places etc. These are Aboriginal site features recordable on AHIMS.
Aboriginal cultural heritage	The tangible (objects) and intangible (dreaming stories, legends and places) cultural practices and traditions associated with past and present-day Aboriginal communities.
Aboriginal object	As defined in the NPW Act, any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.
Aboriginal place	As defined in the NPW Act, any place declared to be an Aboriginal place (under s.84 of the NPW Act) by the Minister administering the NPW Act, by order published in the NSW Government Gazette, because the Minister is of the opinion that the place is or was of special significance with respect to Aboriginal culture. It may or may not contain Aboriginal objects.
Aboriginal resource and gathering sites	Related to everyday activities such as food gathering, hunting, or collection and manufacture of materials and goods for use or trade. These are Aboriginal site features recordable on AHIMS.
AHIMS	Aboriginal Heritage Information Management System. A register of previously reported Aboriginal objects and Aboriginal places in NSW, managed under Section 90 of the NPW Act.
AHIP	Aboriginal Heritage Impact Permit. A permit issued under Section 90, Division 2 of Part 6 of the NPW Act.
Archaeology	The scientific study of material remains of past human life, including artefacts, relics, ruins, buildings and their environment and context.
Art	Art is found in shelters, overhangs and across rock formations. Techniques include painting, drawing, scratching, carving engraving, pitting, conjoining, abrading and the use of a range of binding agents and the use of natural pigments obtained from clays, charcoal and plants. These are Aboriginal site features recordable on AHIMS.
Artefact	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people. These are Aboriginal site features recordable on AHIMS.
Artefact scatter	Multiple artefacts associated with one another in the same context. These are recordable on AHIMS as 'artefacts'.
Burial	A traditional or contemporary (post-contact) burial of an Aboriginal person, which may occur outside designated cemeteries and may not be marked, e.g. in caves,

	marked by stone cairns, in sand areas, along creek banks etc. These are Aboriginal site features recordable on AHIMS.
Ceremonial ring	A Raised earth ring associated with ceremony. These are Aboriginal site features recordable on AHIMS.
Cliff	A steep rock face
Code of Practice	<i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> (DECCW 2010b).
Conflict site	Previously referred to as massacre sites where confrontations occurred between Aboriginal and non-Aboriginal people, or between different Aboriginal groups. These are Aboriginal site features recordable on AHIMS.
DECCW	Department of Environment, Climate Change and Water NSW.
Due Diligence Code	<i>Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales</i> (DECCW 2010a)
Dune	As defined in the Due Diligence Code, a sand ridge or sand hill formed by the wind.
Earth mound	A mounded deposit of round to oval shape containing baked clay lumps, ash, charcoal and, usually, black or dark grey sediment. The deposit may be compacted or loose and ashy. Mounds may contain various economic remains such as mussel shell and bone as well as stone artefacts. Occasionally they contain burials. These are Aboriginal site features recordable on AHIMS.
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
EP&BC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
Fish trap	A modified area on watercourses where fish were trapped for short-term storage and gathering. These are Aboriginal site features recordable on AHIMS.
Grinding grooves	A groove in a rock surface resulting from manufacture of stone tools such as ground edge hatchets and spears, or rounded depressions resulting from grinding of seeds and grains. These are Aboriginal site features recordable on AHIMS.
Harm	As defined in the NPW Act, to destroy, deface, damage or move an Aboriginal object or destroy, deface or damage a declared Aboriginal place. Harm may be direct or indirect (e.g. through increased visitation or erosion). Harm does not include something that is trivial or negligible.
Habitation structure	Structures constructed by Aboriginal people for short- or long-term shelter. Temporary structures are commonly preserved away from the coastline and may include historic camps of contemporary significance. Smaller structures may make use of natural materials such as branches, logs and bark sheets or manufactured materials such as corrugated iron to form shelters. Archaeological remains of a former structure such as chimney/fireplace, raised earth building platform, excavated pits, rubble mounds etc. These are Aboriginal site features recordable on AHIMS.
Headland	A narrow piece of coastal land that projects from a coastline into the sea or ocean
Hearth	Aboriginal site feature recordable on AHIMS. Cultural deposit sometimes marked by hearth stones, usually also contains charcoal and may also contain heat treated stone fragments.
Isolated find	A single artefact found in an isolated context. These are recordable on AHIMS as 'artefacts'.

Modified Trees	Trees which show the marks of modification as a result of cutting of bark from the trunk for use in the production of shields, canoes, boomerangs, burials shrouds, for medicinal purposes, foot holds etc, or alternately intentional carving of the heartwood of the tree to form a permanent marker to indicate ceremonial use/significance of a nearby area, again these carvings may also act as territorial or burial markers. These are Aboriginal site features recordable on AHIMS.
Non-human bone and organic material	Objects which can be found within cultural deposits as components of an Aboriginal site such as fish or mammal bones, ochres, cached objects which may otherwise have broken down such as resin, twine, dilly bags, nets etc. These are Aboriginal site features recordable on AHIMS.
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPW Regulation	<i>National Parks and Wildlife Regulation 2019</i>
Ochre quarry	A source of ochre used for ceremonial occasions, burials, trade and artwork. These are Aboriginal site features recordable on AHIMS.
PAD	A 'potential archaeological deposit'. An area where Aboriginal objects may occur below the ground surface. These are Aboriginal site features recordable on AHIMS.
Ridge	A compound landform element comprising a narrow crest that is longer than its width
Ridge top (or ridgeline)	The crest of a ridge that extends along its highest contours
Shell	An accumulation or deposit of shellfish from beach, estuarine, lacustrine or riverine species resulting from Aboriginal gathering and consumption. Usually found in deposits previously referred to as 'shell middens.' These are Aboriginal site features recordable on AHIMS.
SSDA	State Significant Development Application, under Division 4.7 of the EP&A Act
Stone arrangement	Human produced arrangements of stone usually associated with ceremonial activities, or used as markers for territorial limits or to mark/protect burials. These are Aboriginal site features recordable on AHIMS.
Stone quarry	A source of stone which was quarried and used for the production of stone tools by Aboriginal people. These are Aboriginal site features recordable on AHIMS.
Waterhole	A source of fresh water for Aboriginal groups which may have traditional ceremonial or dreaming significance and/or may also be used to the present day as a rich resource gathering area (e.g. waterbirds, eels, clays, reeds etc). These are Aboriginal site features recordable on AHIMS.
Waters	As defined in the Due Diligence Code, the whole or any part of any river, stream, lake, lagoon, swamp, wetlands, natural watercourse and tidal waters (including the sea), where the boundary of tidal waters is defined as the high-water mark.

Executive Summary

Urbis was commissioned by Time and Place on behalf of Mosman Land No.1 Pty Ltd ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of 40-48 Redan Street, Mosman, legally defined as 1/DP929591, 13/DP920285, 1/DP921113, 1/DP455982, 11/DP1350, 10/DP1350, 9/DP1350, 2/DP33257, 1/DP33257 ('the subject area').

The subject area currently accommodates four 2-storey residential dwellings, and one 2-storey attached dwelling in a landscaped setting.

The Proponent is seeking approval proposing to demolish all buildings within the subject area and construct a residential apartment building with basement car parking. Approval is being sought for the development a State Significant Development Application (SSD-93020230) for in-fill affordable (IAH) housing under Division 4.7 of the *Environmental Planning and Assessment Act 1979* (NSW). The present ACHA has been prepared to address the Planning Secretary's Environmental Assessment Requirements (SEARs) for SSD-93020230 relating to Aboriginal Heritage.

The ACHA was undertaken in accordance with the requirements of regs. 60 and 61 of the *National Parks and Wildlife Regulation 2019* (NSW) and the following guidelines:

- *Applying for an Aboriginal Heritage Impact Permit guide for applicants* (OEH 2011a)
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011b) ('the Assessment Guidelines').
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) ('the Consultation Guidelines')
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) ('the Code of Practice').

The aim of the ACHA is to investigate whether future development of the subject area is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject area and to formulate measures for avoiding or minimising any such impacts.

The ACHA concluded that:

Conclusion 1 – Known Aboriginal Objects and Places

No known Aboriginal objects, or Aboriginal places have been identified that are within the curtilage of the subject area.

Conclusion 2 – Sensitive Landscape Features

Although rock outcrops may once have existed within the subject area and served as a focus of activity in the past, the scale and extent of modern excavation and levelling are considered to have very likely removed any such features.

Conclusion 3 – Ground Disturbance

Ground disturbance associated with urban development includes modification for roads, terracing of the steep hillside for construction and landscaping, and provision of underground services to the residences. This has involved significant disturbance to the shallow soil profile and to the bedrock itself.

Conclusion 4 – Archaeological Potential

Applying the predictive model, the Aboriginal archaeological potential of the subject area is assessed to be very low to low.

Conclusion 5 – Significance Assessment

The subject area has not been identified as having social and cultural significance to the local Aboriginal community.

Conclusion 6 – Impact Assessment

As the proposed ground disturbing works encompass an area of low potential, the proposed development is unlikely to cause direct harm to Aboriginal objects.

Based on the above conclusions, Urbis recommends the following:

Recommendation 1 – Submission of Report

A copy of this report should be submitted with the Environmental Impact Statement (EIS) in support of SSD-93020230.

Recommendation 2 – Unexpected Finds Protocol: Archaeological Material

In the event that any archaeological material is uncovered during any site works, the following steps must be carried out:

- (a) All works must halt in the immediate area of the find to prevent any further impacts to the archaeological material.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist and the Registered Aboriginal Parties for the ACHA must be contacted to determine the significance of the objects.
- (d) If determined to be an Aboriginal object, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided to AHIMS.
- (e) Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
- (f) The Applicant must consult with the Aboriginal community representatives, the archaeologist(s) and Heritage NSW to develop and implement management strategies for all Aboriginal objects.
- (g) Works may only recommence in the vicinity of the find with the approval of Heritage NSW.

Recommendation 3 – Unexpected Finds Protocol: Human Remains

In the event that clearly identifiable human remains are uncovered during any site works, the following steps must be carried out:

- (a) All works must cease immediately in that area and the NSW Police and Heritage NSW contacted.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains.
- (d) The Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the human remains.
- (e) Works shall only recommence with the approval of Heritage NSW.

1

Introduction

1 Introduction

Urbis was commissioned by Time and Place on behalf of Mosman Land No.1 Pty Ltd ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of 40-48 Redan Street, Mosman, legally defined as 1/DP929591, 13/DP920285, 1/DP921113, 1/DP455982, 11/DP1350, 10/DP1350, 9/DP1350, 2/DP33257, 1/DP33257 ('the subject area') (Figure 1 and Figure 2). Altogether, the allotments amass a rectangular land holding, covering approximately 3250 m².

This report has been prepared to support a State Significant Development Application (SSDA) SSD- 93020230 for the site at 40-48 Redan Street, Mosman. The Minister for Planning and Public Spaces, or their delegate, is the consent authority for the SSDA and this application is lodged with the NSW Department of Planning, Housing and Infrastructure (DPHI) for assessment.

The SSDA seeks consent for a multi-storey residential development that utilises the Low and Mid-Rise Housing (LMR) and In-fill Affordable Housing (IAH) policies recently introduced under the State Environmental Planning Policy (Housing) 2021 (Housing SEPP). The design is outlined in the Architectural Plan set prepared by FJC Studio and provided within the SSDA.

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs) dated 5 September 2025 (SSD- 93020230). Specifically, this report has been prepared to respond to the following SEARs:

Table 1 - Planning Secretary's Environmental Assessment Requirements

21. Aboriginal Cultural Heritage	If required:
- 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. - If potential impacts are significant, provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) which: - Identifies, describes and assesses any impacts to Aboriginal cultural heritage sites or values associated with the site. - Is prepared in accordance with relevant guidelines	Aboriginal Cultural Heritage Assessment Report

The ACHA was undertaken in accordance with the requirements of regs. 60 and 61 of the *National Parks and Wildlife Regulation 2019* (NSW) and the following guidelines:

- Applying for an Aboriginal Heritage Impact Permit guide for applicants* (OEH 2011a)
- Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011b) ('the Assessment Guidelines').
- Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) ('the Consultation Guidelines')
- Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) ('the Code of Practice').

The aim of the ACHA is to investigate whether future development of the subject area is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject area and to formulate measures for avoiding or minimising any such impacts.

1.1 Subject Area

The site is located at 40–48 Redan Street, Mosman and comprises the following landholdings:

- Lot 1 on Deposited Plan 33257
- Lot 2 on Deposited Plan 33257
- Lot 1 on Deposited Plan 921113
- Lot 13 on Deposited Plan 920285
- Lot 1 on Deposited Plan 455982
- Lot 9 on Deposited Plan 1350
- Lot 10 on Deposited Plan 1350
- Lot 11 on Deposited Plan 1350

The site is regular in shape and has an area of approximately 3,233 square metres. The site currently accommodates four 2-storey residential dwellings, and one 2-storey attached dwelling in a landscaped setting. The site has a primary frontage to Redan Street to the east and a rear frontage to Redan Lane to the west.

The site is in Mosman, a suburban local government area (LGA) in Sydney's north shore. The site has excellent access to public amenities including supermarkets, cafes and destination shops along Military Road and at Spit Junction, and access to recreational areas including Balmoral Beach to the east and Georges Heights headland to the south. Spit Junction is a recognised town centre under the low and mid-rise (LMR) policy. The site is also close to regular bus services in the immediate vicinity.

The site is not a listed heritage item or located within a heritage conservation area, however Redan Street reserve is listed as a local heritage item in the Mosman Local Environmental Plan 2012 (LEP). The site to the immediate south at 36–38 Redan Street containing a pair of semi-detached houses and to the east at 29 Redan Street containing a house are also a listed local heritage item.

1.2 Proposed Activity

The application seeks development consent for the redevelopment of the site for a multi-storey in-fill affordable housing residential development for 53 dwellings.

Specifically, this application seeks approval for the following:

- Demolition of the existing structures on site, including 5 dwellings and vehicle crossovers.
- Site preparation works including:
 - Tree removal.
 - Excavation across the site.
- Construction of a multi-storey residential flat building comprising:
 - Two levels of basement for 106 car parking spaces, services and storage.
 - 53 residential dwellings in 2-, 3- and 4-bedroom configurations.
 - Communal open space at ground level, level 1 and level 5.
- Ancillary vehicular entry and public domain works from Redan Street.
- Provision of 15% affordable housing to be managed by a community housing provider for a period of 15 years from date of the Occupation Certificate.
- Extension and augmentation of physical infrastructure and utilities as required.

Refer to Architectural Plans prepared by FJC Studio appended to the Environmental Impact Statement. Select plans of the proposed development are provided in Appendix A.

1.3 Statutory Context

The protection and management of Aboriginal cultural heritage items, places and archaeological sites within New South Wales is governed by the relevant Commonwealth, State or local government legislation. These are discussed below in relation to the present subject area.

1.3.1 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (Cth) ('the EPBC Act') provides protection for properties and places listed on the World Heritage List ('WHL'), the National Heritage List ('NHL') and the Commonwealth Heritage List ('CHL').

The WHL is a list of properties around the world considered to be of outstanding value to humanity, the NHL is a list of places of outstanding significance to the nation and the CHL is a list heritage places owned or controlled by the Australian Government. The WHL, NHL and CHL may include properties and places of Aboriginal heritage significance, in addition to places of natural and historical significance.

It is an offence under sections 15A, 15C, 27A and 27C of the EPBC Act to take any action that is likely to have a significant impact of the relevant heritage values of a place listed on the WHL, NHL or CHL. Approval from the Minister is required for controlled actions which will have a significant impact on items and places included on the WHL, NHL or CHL.

Properties and places listed on the WHL, NHL or CHL, are included in the Australian Heritage Database ('AHD'). The AHD also includes places under consideration, or that may have been considered, for any one of these lists. A search of the AHD was undertaken on 27 August 2025. The search did not identify any Aboriginal heritage properties or places within the curtilage of the subject area that are protected under the EPBC Act.

1.3.2 National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NSW) ('the NPW Act') protects 'Aboriginal objects' and 'Aboriginal places' in NSW. The NPW Act defines 'Aboriginal objects' and 'Aboriginal places' as follows:

- **Aboriginal object** means 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.
- **Aboriginal place** means any place, which may or may not contain Aboriginal objects, that is declared to be an Aboriginal place under section 84 of the NPW Act because it is or was of special significance with respect to Aboriginal culture.

Under section 86 of the NPW Act, it is an offence to harm or desecrate an Aboriginal object or Aboriginal place. Section 87 of the NPW Act provides the following defences to prosecution under s. 86 of the NPW Act:

- The harm was to a previously unknown Aboriginal object, other than a modified tree, and was caused by a low impact activity as defined in reg. 58 of the NPW Reg.
- The harm was to a previously unknown Aboriginal object and due diligence was exercised by the Proponent to determine whether the activity would harm an Aboriginal object and reasonably determined that no Aboriginal object would be harmed, per section 87(2) of the NPW Act.
- The harm or desecration was authorised by an Aboriginal Heritage Impact Permit ('AHIP'), per section 87(1) of the NPW Act.
- The harm or desecration was authorised by an approved State Significant Development Application, per section 4.41(1)(d) of the *Environmental Planning and Assessment Act 1979* (NSW).

As noted in Section 1 above, the ACHA was undertaken in support of State Significant Development Application, which seeks approval for the proposed works outlined in Section 1.2.

1.4 Authorship

The present report has been prepared by Jordan Gilbert (Urbis Assistant) and Owen Barrett (Urbis Senior Consultant) with review and quality control undertaken by Ali Byrne (Urbis Associate Director).

Jordan Gilbert holds a Bachelor of Archaeology from Macquarie University, and First Class Honours in Archaeology from the University of Sydney. Owen Barrett holds a Bachelor of Arts (Archaeology and Paleoanthropology) and a Diploma (Indigenous Archaeology) from the University of New England. Ali Byrne holds a Bachelor of Arts (Archaeology) from the University of Sydney.

1.5 Limitations

The ACHA is limited to consideration of Aboriginal objects and places. Historical heritage properties and places protected under the EPBC Act and historical heritage items and relics protected under the *Heritage Act 1977* (NSW) are not considered.

The ACHA was limited to a desktop assessment and visual inspection and did not include subsurface investigation, nor did it consider built heritage of the subject area.

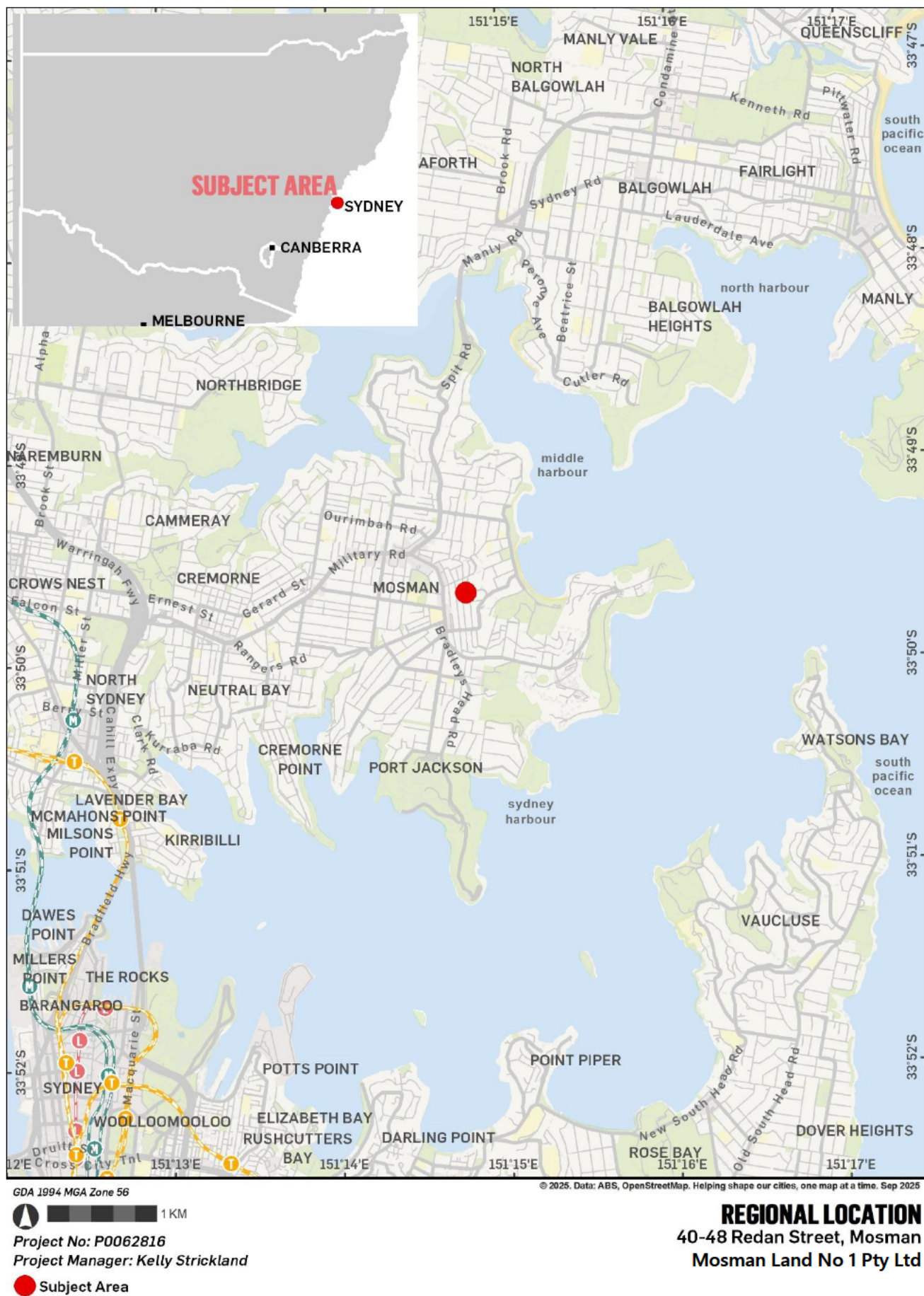


Figure 1 - Regional location of the subject area



GDA 1994 MGA Zone 56

© 2025. Data: ABS, OpenStreetMap, Nearthmap. Helping shape our cities, one map at a time. Sep 2025



Project No: P0062816

Project Manager: Kelly Strickland

Subject Area — Contours

LOCATION OF THE SUBJECT AREA

40-48 Redan Street, Mosman

Mosman Land No 1 Pty Ltd

Figure 2 - Location of the subject area

2

Aboriginal Consultation

2 Aboriginal Consultation

Consultation with the Aboriginal community is required under reg. 60 of the NPW Reg and the Consultation Requirements. The purpose of consultation with Aboriginal people is to understand their views and concerns about the proposed project and to understand the cultural values present in the area that may be harmed. Consultation ensures that Aboriginal people have the opportunity to improve assessment outcomes by providing relevant cultural information, influencing assessment methodology, contributing to the development of cultural heritage management options and reviewing and commenting the draft assessment report.

The Consultation Requirements outline a four-stage consultation process that includes the following:

- Stage 1 – Notification of project proposal and registration of interest.
- Stage 2 – Presentation of information about the proposed project.
- Stage 3 – Gathering information about the cultural significance.
- Stage 4 – Review of draft cultural heritage assessment report.

The following section documents the conduct and results of the Aboriginal consultation undertaken as part of the present assessment.

2.1 Stage 1 – Notification and Registration

The aim of Stage 1 of Aboriginal consultation is to identify, notify and register Aboriginal people who hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places in the subject area.

2.1.1 Native Title

A search of the National Native Title Tribunal (NNTT) registers and databases was undertaken on 27 August 2025. The search identified no pending Native Title claims or Native Title registrations for the subject area. The NNTT was also contacted by email on 27 August 2025 to request a formal search of the NNTT Register. A reply was received on 27 October 2025 indicating that there are no Native Title matters overlapping with the subject area

2.1.2 Identification of Cultural Knowledge Holders

To identify Aboriginal people who may be interested in registering as Aboriginal parties for the project, the organisations stipulated in Section 4.1.2 of the Consultation Guidelines were contacted on 27 August 2025 (Table 2). A copy of the email sent to the each of the contacted organisations is included in Appendix D: Registered Aboriginal Party Consultation Documentation. A total of 78 Aboriginal parties with a potential interest in the subject area were identified during this stage. However, Mosman Municipal Council recommended contacting the Gaimaragal Group. With only a website available and no public contact details listed, direct contact was not possible, reducing the total identified groups to 77.

Table 2 – Contacted organisations

Organisation	Notification Sent	Response Received
Greater Sydney Local Land Services	27 August 2025	27 August 2025
Heritage NSW	27 August 2025	2 September 2025
Metropolitan Local Aboriginal Land Council	27 August 2025	No response
Mosman Municipal Council	27 August 2025	28 August 2025

National Native Title Tribunal	27 August 2025	27 August 2025
NTS Corp	27 August 2025	No response
Office of the Registrar, Aboriginal Land Rights Act 1983	27 August 2025	28 August 2025

Letters were sent to the 77 identified Aboriginal parties by either email or mail on 10 September 2025 to notify them of the proposed project. The letters included a brief introduction to the project and the project location including a map of the subject area and set a deadline for response of 23 September, providing 14 days to register an interest. A copy of the letter is included in Appendix D: Registered Aboriginal Party Consultation Documentation.

An advertisement was placed in one online newspaper with national circulation to Aboriginal People, the 'NewsCorp Australia'. The advertisement was published online on 10 September 2025 and registration was open until 23 September 2025, providing 14 days to register an interest. A copy of the advertisement is included in Appendix C.

2.1.3 Registration of Interest

A total of 9 Aboriginal parties registered interest in the project as a result of this phase (*Table 3*). The Metropolitan LALC was registered despite not responding, bringing the total number of registrations to 10. Acknowledgement emails were made by Urbis to all respondents to confirm registration had been received.

A list of the Registered Aboriginal Parties (RAPs) was provided to Heritage NSW and Metropolitan Local Aboriginal Land Council on 24 September 2025 (see Appendix C).

Table 3 – Registered Aboriginal Parties

Registered Party	Contact
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

2.2 Stage 2 & 3 – Presenting and Gathering Information

The aim of Stages 2 and 3 of the community consultation process is to provide RAPs with information about the scope of the proposed project and the proposed ACHA methodology, to gather feedback on the proposed project and proposed methodology and to gather any cultural information that the RAPs wish to share.

2.2.1 Presentation of Project Information and Methodology

A Stage 2 & 3 information pack was sent to registered Aboriginal parties via email on 24 September 2025. The information pack was prepared as a combination of Stage 2 and 3 of the Consultation Guidelines, and included the following information:

- An outline of the proposal and an overview of the subject area.
- The proposed methodology for the ACHA, including the impact assessment process and input points for RAPs into the investigation and assessment.
- Critical timelines and milestones for the completion of assessment activities and delivery of reports.
- Agreed roles, functions and responsibilities.
- A request for comment on methodology, recommendations for site investigation any cultural information the respondent wished to share.

A response to the Stage 2 & 3 information pack was requested by 21 October 2025, providing 28 days to respond. A copy of the Stage 2 & 3 information pack is included in Appendix C.

2.2.2 Site Visit and Meeting

A separate communication was sent on 28 October 2025 to RAPs who had responded to the stage 2-3 information package. The communication invited the RAPs to register for a site visit and meeting to be held on 3 November 2025 as part of Stage 2 & 3 of the consultation process.

The purpose of the site inspection and meeting was to conduct a thorough briefing with the RAPs about the proposed development, to conduct a walkover of the subject area with the RAPs, to discuss the information provided in the Stage 2 & 3 information pack and to discuss potential archaeological mitigation strategies.

One response to the invitation to attend the site visit and meeting was received from [redacted] [redacted] Due to a misunderstanding regarding the proposed time, the representative from [redacted] was unable to attend. As such, no comments were recorded at this stage.

The site visit proceeded with attendance by John Skolaik (Urbis archaeologist), who undertook a thorough walkover of the area. No evidence of Aboriginal activity was identified. Further details of the site visit are provided in Section 4.

2.2.3 Gathering Feedback

Responses from two of the RAPs were received in relation to the Stage 2 & 3 information pack. The responses are included in Appendix C. Of the two responses received, only one included comments on the proposed methodology and/or provided cultural information. Those responses are addressed in Table 4 below.

Table 4 – RAP responses to the Stage 2 & 3 Information Pack

RAP	Response	Urbis Response
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]
[redacted]		[redacted]

2.3 Stage 4 – Review of Draft ACHA Report

The aim of Stage 4 of the community consultation process is to prepare and finalise an ACHA report with input from RAPs.

A draft of the present ACHAR was sent to RAPs via email on 17 November 2025 with comment on the draft ACHAR requested by 15 December 2025, providing 28 days to respond. No responses were received in relation to the Stage 4 draft ACHA report.

3

Desktop Assessment

3 Desktop Assessment

The aim of the desktop assessment is to determine whether any known Aboriginal objects are located within the subject and whether the subject area is likely to retain any unknown Aboriginal objects. The findings of the desktop assessment inform the archaeological survey of the subject area and contribute to the determining whether an archaeological test excavation is required.

3.1 Archaeological Context

The archaeological context of the subject area encompasses previous archaeological and ethnohistorical studies that are relevant to determining the nature and distribution of Aboriginal archaeological material within the local region and subject area and local region.

3.1.1 Aboriginal Land Use

The subject area lies within a landscape connected to both the Cammeraigal (also referred to as Kammeraegal, Gamaraigal) people of the Guringai language group and the Borogegal people, who were located east of the Cammeraigal, on the northern side of Port Jackson and the western side of Middle Harbour. While some sources identify Bradleys Head and surrounding land as Borogegal country, others describe this land as part of the Cammeraigal estate, whose custodianship extended across Mosman and North Sydney, including Cammeray, Balls Head (*Yerroulbine*), Balmoral, Kirribilli and Cremorne (*Wulwarrajeung*). Given the overlapping accounts of country boundaries and the cultural significance of both groups, it is most appropriate to acknowledge that the subject area may have associations with either or both the Cammeraigal and Borogegal peoples.

Primarily a water-based people, the Cammeraigal and Borogegal lived along the coast and rivers, fishing and hunting in the waters and hinterland areas (AHO, 2006). They subsisted primarily on aquatic resources and the high of middens located around this area attests to the importance of shellfish in the diets of Cammeraigal people. This would have been supplemented by a variety of seeds, fruits, nuts, rhizome and tubers. The sandstone topography of the area was equally as important – with overhangs and cliffs providing shelters to camp within.

Archaeologically, over 1,000 sites across the lands of the Cammeraigal and Borogegal people attest to the extent of occupation and habitation in this area (Hoskins, 1920). The most common identified site type in the area are shelters with middens, reflective of the coastal environment and subsistence on aquatic life, as well as the importance of sandstone. The sandstone topography of the northern Sydney area did not only provide shelter, but also a place to share stories and ceremonies through art.

The archaeological record also provides evidence for the exploitation of stone materials that were able to withstand degradation and decay. As a result, there is often a high representation of stone artefacts associated with highly trafficked areas including shelters, and middens. Flaked artefacts are typically the most common type of stone artefact encountered, in part due to their long and ubiquitous use, but also due to their high discard rate and the large amount of waste produced during manufacture (Holdaway et al, 2004:1). From about 1,500 BP, there is evidence of a decline in stone tool manufacture, possibly due to an increase in the use of organic materials, changes in the way tools were made or changes in tool preferences (Attenbrow 2010). After European contact, Aboriginal people of the Sydney region continued to manufacture tools, sometimes with new materials such as bottle glass or ceramics (e.g. Ngara Consulting 2003).

Based on the above background, it is possible that similar evidence of Aboriginal occupation will also be present within original and/or intact topsoils within the present subject area.

3.1.2 Declared Aboriginal Places

The NSW State Heritage Inventory (SHI) includes all declared Aboriginal places within NSW, in addition to historic heritage items listed on the State Heritage Register (SHR), listed Interim Heritage Orders (IHOs) and items listed on Local Environment Plans (LEPs) and State Environmental Planning Policies (SEPPs).

A search of the SHI was undertaken on 29 August 2025. The search did not identify any heritage items within the curtilage of the subject area.

3.1.3 Registered Aboriginal Objects

The Aboriginal Heritage Information Management System (AHIMS) is a database of registered Aboriginal sites in NSW. Each registered Aboriginal site includes one or more site 'features', which may be considered an Aboriginal object under the NPW Act. An Aboriginal site may include one or more site features.

The *Guide to completing the AHIMS Site Recording Form* (OEH 2012) lists 20 different features that may be recorded on AHIMS. The most common site features registered in NSW are artefacts, modified trees, art, grinding grooves and shell deposits (see Glossary for definitions). However, the likelihood of any particular site feature being found will vary according to region and environment. Less common site features that are encountered are burials, ceremonial rings, earth mounds, fish traps, habitation structures, hearths, non-human bone and organic material, ochre quarries, stone arrangements and stone quarries (see Glossary for definitions).

Other Aboriginal site features that are recorded on AHIMS but are not necessarily 'Aboriginal objects' within the meaning of that term as it is defined in the NPW Act (i.e. are not a 'deposit, object or material evidence... relating to the Aboriginal habitation of the area') are potential archaeological deposits (PADs), Aboriginal ceremony and dreaming sites, Aboriginal resource and gathering sites, conflict sites and waterholes (see Glossary for definitions). These features are only considered to be 'Aboriginal objects' for the purpose of the NPW Act if accompanied by at least one of the other site types defined above.

The AHIMS database also provides information on the context of registered Aboriginal sites. Sites that are recorded as 'closed' context s are those that include a cave or rock overhang, while all other sites are recorded as 'open' context.

It should be noted that the AHIMS register does not represent a comprehensive list of all Aboriginal objects or places as it is limited to sites that have been previously identified and registered. Registration is typically the result of previous archaeological investigation, so the number of registered Aboriginal sites in area is dependent on the amount of such research previously undertaken.

A search of the AHIMS was carried out on 28 August 2025 (AHIMS Client Service IDs: 103826 and 103827) for an area of approximately 3 km x 3 km centred on the subject area.

The search was undertaken to determine if:

- There are any registered Aboriginal sites registered within the curtilage of the subject area.
- There are any registered Aboriginal sites near the subject area that might extend into it.
- There is any association of Aboriginal sites with certain landscape features within the broader region that may be instructive for determining the likelihood of Aboriginal sites within the subject area.

The Basic and Extensive AHIMS search results are included in Appendix B. The results of the search are discussed below

3.1.3.1 Identified Sites

A total of 50 Aboriginal sites are registered in the search area. Two of the recorded Aboriginal sites were identified as 'not a site' in the search results, reducing the total number of identified Aboriginal site to 48. The locations of the 48 identified Aboriginal sites are shown in Table 5.

The search did not identify any Aboriginal objects or Aboriginal places within the curtilage of the subject area.

However, the search identified two separately registered sites 80 metres northwest of the subject area.

- **AHIMS Site Card#45-6-0267** details several engravings on the ridgeline between Mosman Bay and Balmoral Beach. These engravings consisted of 3 whales (one of which measured approximately 21 feet long), a human figure, porpoise, kangaroo, and a club. This has since been destroyed by permitted development.

- **AHIMS Site Card#45-6-0740** describes a rock engraving, likely that of an eel, on the edge of the same rock platform detailed in AHIMS Site Card#45-6-0267. This has since been destroyed by permitted development.

A review of the AHIMS site cards indicates that the two nearby registered art sites are located on elevated sandstone platforms situated along the north south aligned ridgeline. These registered sites share common characteristics, including expansive outlooks, relatively flat sandstone surfaces suitable for engraving, and close proximity to natural vantage points. The subject area, by contrast, is positioned approximately 80 metres downslope and lacks the geological and topographical features typically associated with rock engraving sites. The slope is steeper, with limited sandstone exposures and reduced visibility across the landscape, conditions which are not conducive to the placement of art. Given these distinct differences in landscape setting, and in light of the site card data, it is unlikely that these nearby art sites extend downslope into the present subject area.

3.1.3.2 Site Features

In the broader search area, the number and types of sites features are presented in Table 5. Among the 48 registered Aboriginal sites in the search area, a total of 66 site features were identified of five different types: Art, Artefact, Burial, PAD and Shell.

Of the confirmed sites shell and art sites are the most common. Shell sites (middens) are present in 57% of all registered sites ($n = 28$) and account for 42% of registered site features. The high representation of shell sites is consistent with the location of the subject area near Sydney Harbour. This body of water would have been a source of aquatic resources for local Aboriginal people. The relatively high representation of art sites and burials in the search area is also consistent with the location of the subject near water. Art sites are found along the ridgeline and shoreline where sandstone outcrops are more likely, while burials are found in the loose soils of dune systems adjacent to water.

Also common in the local area are artefacts, which are present in 18% of registered sites ($n = 8$) and account for 14% of registered site features. This finding is consistent with the important role of stone tools in the everyday lives of Aboriginal people discussed in Section 3.1.1 above. Artefact sites are also concentrated around shorelines, reflecting the importance of water and aquatic resources to the local Aboriginal people.

The contexts of the registered Aboriginal sites within the AHIMS search area are also summarised in Table 6 below. Closed context sites are those that include a cave or rock overhang, while open context sites are those without a cave or rock overhang. Most registered Aboriginal sites in the search area are open context sites, representing 55 % ($n = 27$) of all sites. The closed context sites in the search area are concentrated at the base of the slopes, close to the shoreline near Balmoral beach where the steep topography and exposures of Hawkesbury sandstone favour the formation of rock overhangs and caves.

Table 5 - Summary of registered Aboriginal features identified within the registered AHIMS sites

Site Features	Number	% of Sites	% of Features
Shell	28	57	42
Art	21	43	32
Artefact	8	18	14
Burial	3	6	5
PAD	3	6	5

Table 6 - Summary of closed and open context sites within the AHIMS search area

Context	Number	% of Sites
Open	27	55
Closed	22	45



GDA 1994 MGA Zone 56

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Project No: P0062816
Project Manager: Kelly Strickland

Subject Area Conservation Area - General

Item - General Item - Archaeological

HISTORICAL HERITAGE ITEMS
40-48 Redan Street, Mosman
Mosman Land No 1 Pty Ltd

Figure 3 - Heritage items

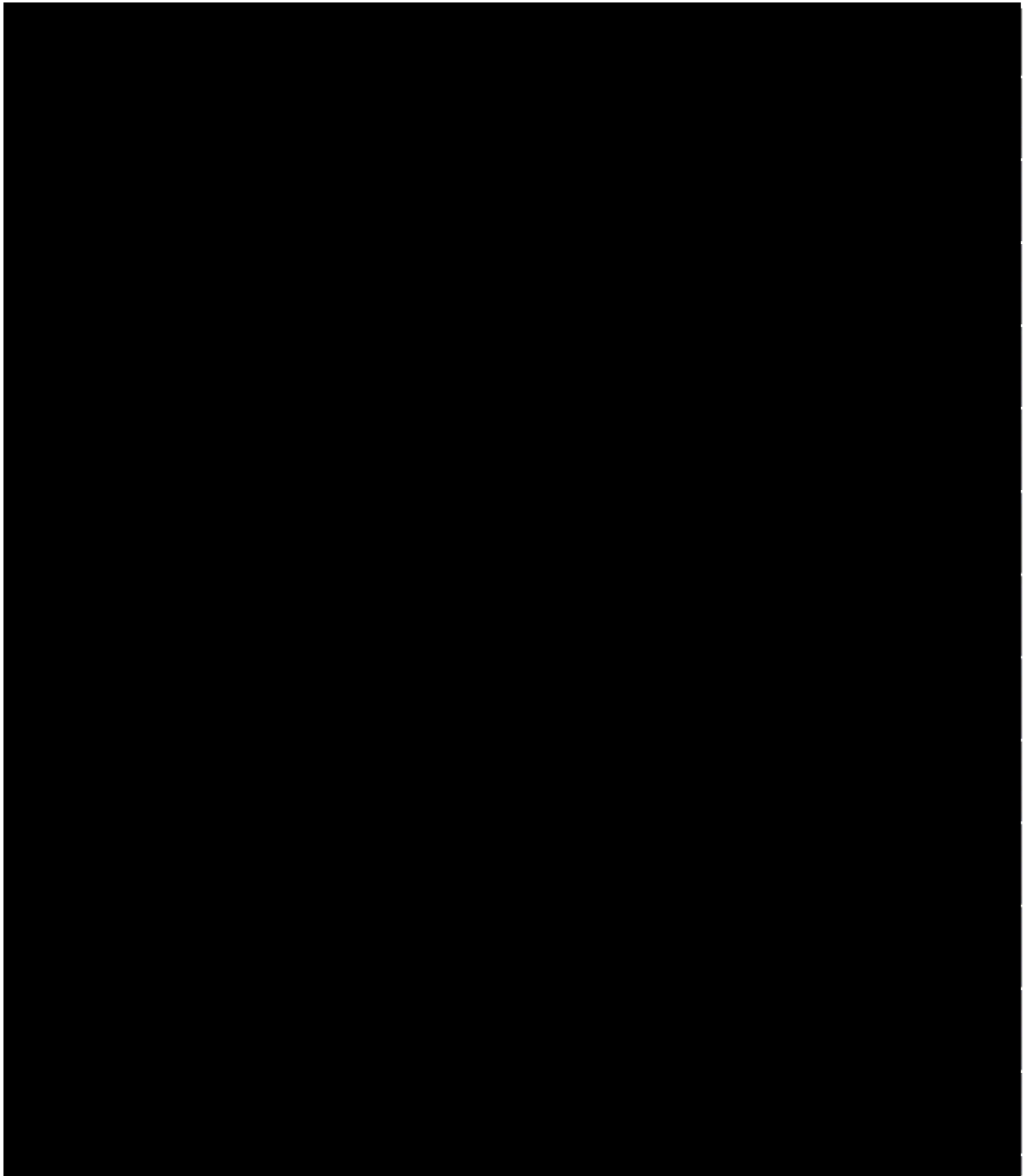


Figure 4 - Locations of registered Aboriginal site in AHIMS search area

3.1.4 Previous Archaeological Investigations

Previous Aboriginal archaeological investigations undertaken within or near to the subject area may provide information about known Aboriginal sites that have not previously registered on the AHIMS database. Additionally, Aboriginal archaeological investigations undertaken in the broader region may provide information on the types of archaeological site features that are likely to occur within the subject area.

3.1.4.1 Investigations of the Subject area

There are no previous archaeological reports relating directly to the present subject area.

3.1.4.2 Regional Investigations

Archaeological publications which relate to the Mosman area date back over 120 years, with W. D. Campbell's (1899) and R. H. Mathews (1898, 1899) systematic recordation of Aboriginal rock engravings around Sydney throughout the 1890s. The subsequent 50 years experienced a hiatus in the investigation of Aboriginal sites.

Mosman Council commissioned heritage studies for the municipality in the late 20th century (Haglund and Rich 1988; Koettig 1991). Haglund and Rich (1988) identified 21 Aboriginal sites within the LGA and, just 3 years later, Koettig (1991) identified 77.

Throughout the 1990s Attenbrow (1990, 1991, 1991, 1993, 1994, 1995) undertook a number of archaeological surveys and excavations within the Mosman LGA. Attenbrow identified a further 123 occupation sites (1990). Excavations of a rock shelter at Balmoral Beach (Attenbrow 1992, 1993, 1994 & 1995) revealed a continuous record of occupation from 2,500 BP.

In 2005 an Aboriginal Heritage Study (AHS) was prepared for the Mosman LGA by AMBS. This publication was commissioned by the NSW National Parks and Wildlife Service (NPWS), Metropolitan Local Aboriginal Land Council (MLALC), Mosman Council and Sydney Harbour Federation Trust (SHFT) for the purpose of clearly articulating the responsibilities of these agencies in respect of the Aboriginal heritage of the Mosman LGA. At the time of writing there were 92 recorded sites within the Mosman LGA and the AHS identified a further 15.

The following presents a summary of the most pertinent publications:

Koettig (1991) undertook a review of Aboriginal sites throughout the Mosman LGA which identified a total of 77 Aboriginal sites. It was found that site types were 'typical of those found in the Hawkesbury Sandstone Region', which is characterised by an absence of stone arrangements, grinding grooves and scarred trees (Koettig 1991:39). Koettig found that although Aboriginal sites could be found in all parts of the landscape, clear associations were observed between particular site types and landscape features, with engravings more likely to be found along ridgetops and middens within proximity of the shoreline.

AMBS (2005) undertook a heritage study of the Mosman LGA. It was considered that the Aboriginal heritage of the Mosman LGA as exceptional on the basis that the frequency and preservation of archaeological finds is almost unparalleled within the Sydney Metropolitan Area. The study concluded that the highest frequencies of archaeological sites are around the foreshore; and lowest frequencies on interconnecting ridgetops. Fewer sites were observed in association with interconnecting ridgetops, with the ends of ridgetops exhibiting the greatest potential because they 'provided the easiest access to water' (AMBS 2002:103).

NSW Department of Environment, Climate Change and Water (2010) undertook an Aboriginal heritage study of the Mosman area. The study identified middens as the dominant feature of the local archaeological record, accounting for over 60 per cent of recorded sites. Of these, approximately two-thirds are situated within rock shelters, and more than two-thirds occur within ten metres of the foreshore. By contrast, fewer than a quarter are located along ridge sides, and only a small proportion appear on ridge tops. This spatial pattern underscores the centrality of marine resources to Aboriginal lifeways in the Mosman region and reflects the recurring activities associated with midden formation and use.

The study also examined the distribution and characteristics of Aboriginal engravings. It found that the placement of engravings is not random but highly selective, shaped by both topography and geology. Within the Sydney Basin, engravings are typically located on Hawkesbury Sandstone ridge tops, particularly where expansive vistas are available. The character of the engravings appears to vary with location: those on elevated sites tend to exhibit a higher degree of stylistic formality and consistency, suggesting their association with

ceremonial activity. In contrast, engravings found in lower-lying areas display less formal characteristics, which are interpreted as being linked to domestic or everyday contexts.

More broadly, the report concluded that site distribution across Mosman demonstrates a pronounced preference for foreshore environments, with fewer cultural remains recorded along ridge tops and upper slopes. The location of middens, in particular, aligns closely with the focus of daily activities, affirming the significance of foreshore resources in sustaining Aboriginal communities. Ridge tops, by contrast, appear to have been used more sparingly, likely functioning as transit corridors or specialised activity zones rather than primary habitation areas. Evidence suggests that people moving within the Mosman landscape utilised ridge-top pathways for efficiency and accessibility while concentrating subsistence and cultural practices closer to the shoreline.

3.1.5 Existing Predictive Models

Predictive models are used to determine the likelihood of Aboriginal archaeological material being located within a particular area. A review of existing predictive models relevant to the region around subject area is relevant for formulating a predictive model for the present assessment.

The *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010c) ('The Due Diligence Code') provides an overarching predictive model for the entirety of NSW. The Due Diligence Code specifies the following 'relevant landscape features' that are considered indicative of likely past Aboriginal land use:

- Areas within 200 m of waters including freshwater and the high tide mark of shorelines.
- Areas located within a sand dune system.
- Areas located on a ridge top, ridge line or headland.
- Areas located within 200 m below or above a cliff face.
- Areas within 20 m of or in a cave, rock shelter, or a cave mouth.

Based on the aforementioned archaeological investigations, several associations between Aboriginal land usage and the natural landscape in the Mosman region can be adopted to form a more refined, specific model. These associations are outlined below:

- Shell middens are the most prominent sites, typically found within 10 metres of the shoreline.
- Rock shelters close to natural waterways provided shelter and are subsequently heavily represented in the archaeological record.
- There are typically no stone arrangements, grinding grooves, or scarred trees associated with the Mosman area.
- Few Aboriginal sites are associated with ridge tops; however, expansive vistas, often at the ends of ridge lines, may exhibit engravings linked to ceremonial activities.

3.2 Environmental Context

The environment context of the subject area encompasses the natural landscape and the impacts of historical human activity. These aspects of the environmental context are relevant to predicting the potential for unknown Aboriginal objects occurring within the subject area.

3.2.1 Natural Landscape

The purpose of reviewing the natural landscape of the subject area is twofold. It assists in the prediction of the intensity and nature of Aboriginal land use and deposition of archaeological material in the subject area by considering the landforms and resources that would have played a part in the everyday lives of Aboriginal people. It also assists in the determining the likelihood that those material remains would have survived any natural geomorphological process or historical ground disturbance (discussed in Section 3.2.2 below).

Topography: The subject area is located on a side slope of a north-south aligned ridgeline (Figure 5).

Soils and Geology: The NSW Soil and Land Information System (SALIS) provides information on expected soil landscapes within NSW.

The subject area is located within the GyMEA soil landscape characterised by its localised steep slopes and Hawkesbury sandstone rock outcrops (Figure 6). Soils located on side slopes that occur near or on the outer edges of rock outcrop benches feature up to 20 cm of loose sandy A1 Horizon overlying bedrock. Alternatively, soils located on the inner sides of benches typically consist of 30 cm of A1 Horizon, overlying 10–30 cm of B Horizon. Occasionally, the B Horizon is underlain by up to 30 cm of C Horizon. The transitions between these soil layers are gradual, with total soil depth ranging from 30 to 70 cm.

Notably, the eastern boundary of the subject area borders the Hawkesbury soil landscape which is characterised by sandstone outcrops and boulders, and discontinuous soils. Usually 10–30 cm of A1 Horizon overlies bedrock on the outsides of benches whilst 5–15 cm of A1 Horizon overlies up to 50 cm of B Horizon on higher sides of benches. Boundaries between soil materials are either gradual or clear and total soil depth, although variable, is usually <70cm.

Preliminary desktop research indicates the presence of exposed Hawkesbury sandstone formations within several allotments. This is consistent with the geological character of the region. However, it is important to note that, despite the numerous sandstone rock outcrops in the area, no rock shelters or caves have been identified within 20 metres of the site. As such, the geology and soils upon which the subject area is located upon are not considered 'sensitive' per the definition outlined in the Due Diligence Code.

Geomorphic Activity: The primary geomorphic activity in the GyMEA landscape is erosion, which has likely accelerated the removal and/or displacement of artefacts from their original location. Similarly, the Hawkesbury soil landscape is associated with colluvial geomorphic activity, which often prevents the accumulation of artefacts as topsoils on slopes are stripped and moved downhill. Consequently, both types of geomorphic activity have likely led to the displacement of artefacts within the subject area.

Vegetation: The original dry sclerophyll woodland and open-forest have been extensively cleared. Low, dry sclerophyll open-woodland dominates ridges and upper slopes. Common species include red bloodwood *Eucalyptus gummifera*, yellow bloodwood *E. eximia*, scribbly gum *E. haemastoma*, brown stringybark *E. capitellata* and old man banksia *Banksia serrata*. On the more sheltered slopes, black ash *E. sieberi*, Sydney peppermint *E. piperita* and smooth-barked apple *Angophora costata* are common tree species. The dry sclerophyll understorey consists of shrubs from the families Epacridaceae, Myrtaceae, Fabaceae and Proteaceae.

Hydrology: The nearest natural waterway is Balmoral beach located approximately 470 metres east of the subject area. (Figure 6).

The relevance of the natural landscape for the present assessment is discussed in the application of the predictive model to determining Aboriginal archaeological potential in Section 3.4.2 below.

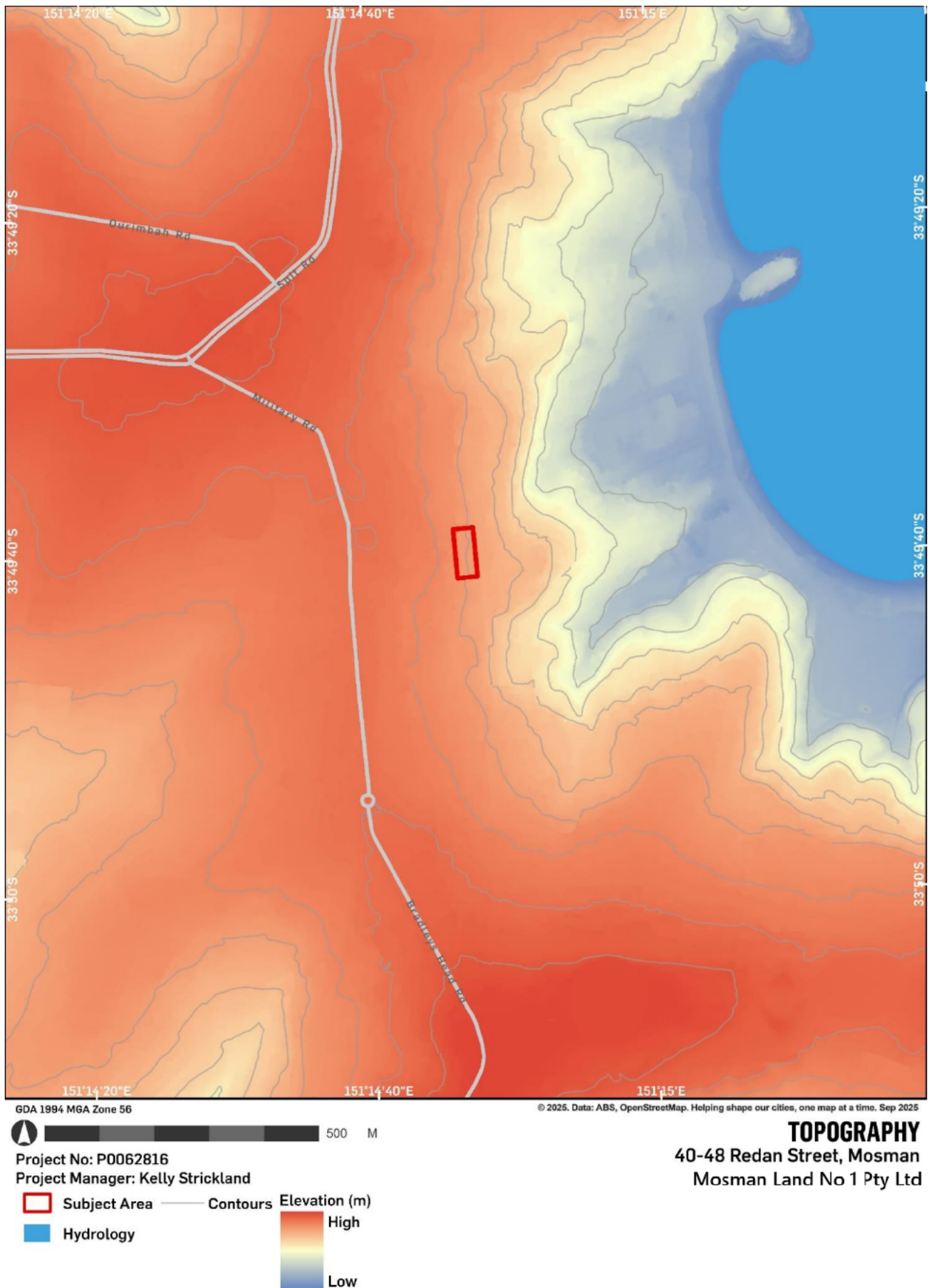
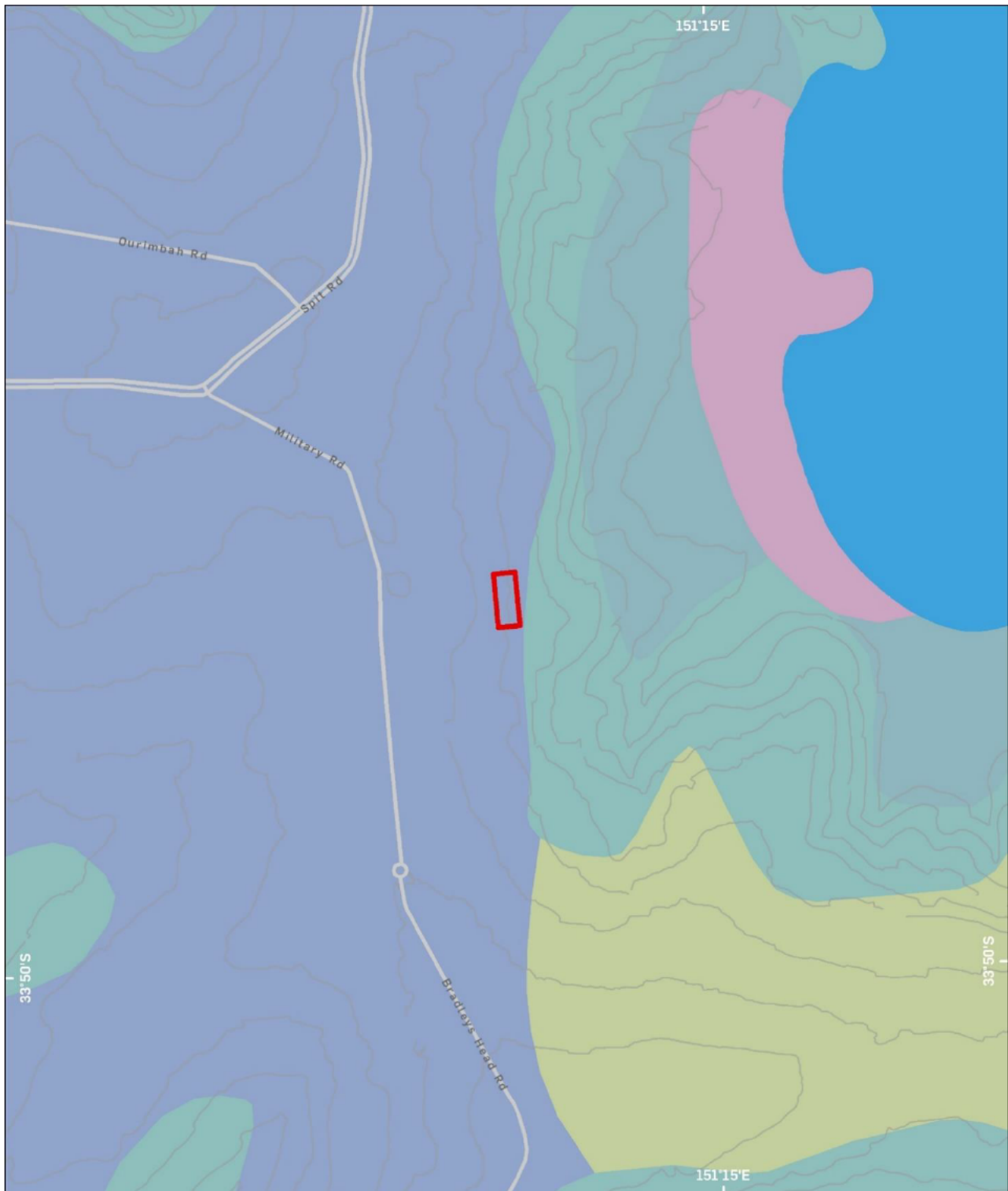


Figure 5 - Topography



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500 M

Project No: P0062816

Project Manager: Kelly Strickland

SOIL LANDSCAPES AND HYDROLOGY

40-48 Redan Street, Mosman

Mosman Land No 1 Pty Ltd

- Subject Area
- Hydrology
- Hydrology 200m Buffer
- GYMEA/LAMBERT (Erosional)
- HAWKESBURY (Colluvial)
- LAMBERT (Erosional)
- NEWPORT (Aeolian)
- WOY WOY (Aeolian)
- Contours

Figure 6 – Soil landscapes and Hydrology

3.2.2 Historical Ground Disturbance

Disturbance to the natural landscape, either through human activity (e.g., clearing of vegetation, ploughing and construction of buildings) or natural processes (e.g., erosion), reduces the likelihood of deposited Aboriginal objects being retained, either through destruction of the Aboriginal objects or their removal. Ground disturbance may affect the natural topsoil (A-horizon), within which subsurface Aboriginal archaeological remains are typically found, and other surface features associated with Aboriginal objects, such as trees, rock platforms and rock overhangs.

For the purpose of the present assessment, historical ground disturbance is rated according to the following scheme:

- **High:** all or most topsoil has been removed, with at most only a small part of the lower portion of topsoil possibly remaining intact
- **Moderate:** the upper part of the topsoil has been substantially disturbed or removed, but a substantial amount remains intact
- **Low:** little or no disturbance or removal of topsoil, with all or most topsoil remaining intact

The degree of disturbance is relative to the depth of the natural topsoil. For example, disturbance of the upper 30 cm of a natural soil profile by ploughing may be high if the topsoil only 30 cm deep, but only moderate if the topsoil is 1 m deep.

European settlement commenced in Mossmans Bay, later Mosman, in 1814 with the establishment of small farms around the region of Hunter's Bay. By all accounts, the landscape of Mosman was largely characterised by dense forests, swampy, brackish marsh and rocky foreshore outcrops. Situated across Sydney Harbour, Mosman provided an early albeit far reaching outpost for settlers seeking to expand farming and later whaling operations in the regions surrounding creek lines and inlets throughout Mosman (Australian Town and Country Journal, 3 June 1914, '*The Beautiful Suburb of Mosman*').

The subject area forms part of a 20-acre parcel originally granted to William Hellyer on 29 October 1853. Hellyer mortgaged the land in 1866 and, by 1873, was compelled to transfer ownership to Richard Harnett. An 1885 plan delineates Harnett and Stuart's Mosman estate, with the subject area marked as unsold and designated 'Beuna Vista Heights', by which time, Redan Street and Muston Lane had been constructed (Figure 7). A crown plan from 1890 shows various survey points along Redan Street (Figure 8), suggesting the likely subdivision, though the area remained undeveloped.

The first definitive evidence of construction within the subject area comes from a Sydney Water plan dated to 1899, which shows a singular dwelling at no.44 (Figure 9). The remainder of the subject area remains undeveloped. By 1902, a subdivision plan shows two dwellings located within the subject area (Figure 10).

Aerial imagery from 1930 reveals the majority of the subject area has been developed by this time (Figure 11). In 1951, four large residential dwellings can be seen clearly within the subject area (Figure 12). No significant changes are observed from 1951 to 1986 (Figure 12-Figure 15). However, between 1986 and 2025 (Figure 15-Figure 16), for which we lack aerial images, several changes (i.e. addition of free-standing garages and landscaping) appear to have been made to the individual allotments. More significant changes are observed within property Number 44, including the addition of a free-standing garage fronting Redan Lane, installation of a pool fronting Redan Street, extension of the house in a southerly direction, and landscaping. Similarly, Number 48 has been demolished and subdivided, with two new houses constructed.

In c.1982, an easement for drainage was constructed through Lots 13 DP920285 and 1 DP921113, between Nos. 40 and 42 (Figure 17).

Figure 18 and Figure 19 below are extracts from architectural plans for a previous Development Application (DA) from 2024. It shows a cross section of 46 Redan Street and the significant difference in height between Redan Street and Redan Lane. Significant terracing of the natural landscape has occurred to accommodate construction of residences and other structures.

Taken together, the subject area has been subject to land clearance, earthworks, and construction activities associated with the extant 20th century buildings, and later modifications. This has occurred in

stages, with the 20th century dwelling within the northern portion of the subject area (no.46 & 48) having been demolished, and in its place, two new multistorey structures erected which has likely caused significant ground disturbance.

Similarly, landscaping of gardens and yards has likely displaced or entirely removed natural topsoils. Nonetheless, some remnants of the A Horizon or B Horizon soils may still be present (albeit the latter is typically considered non-artefact-bearing). A site inspection is required to fully understand the extent of modification of the natural landscape.

As the subject area is located within the shallow soils of the Gynea soils, the depth of disturbance across the entire subject area is likely far greater than the depth of artefact-bearing (A Horizon) soils. Therefore ground disturbance is considered to be **moderate** in landscaped areas to **high** at the location of structures.

The relevance of historical ground disturbance for the present assessment is discussed in the application of the predictive model to determining Aboriginal archaeological potential in Section 3.4.2 below.



Figure 7 - 1885 Plan showing the subject area (green outline) making up part of 'Buena Vista Heights' in the estate of Harnett and Stuart

Source: SLNSW <https://collection.sl.nsw.gov.au/digital/R3656zbvrrN5e>

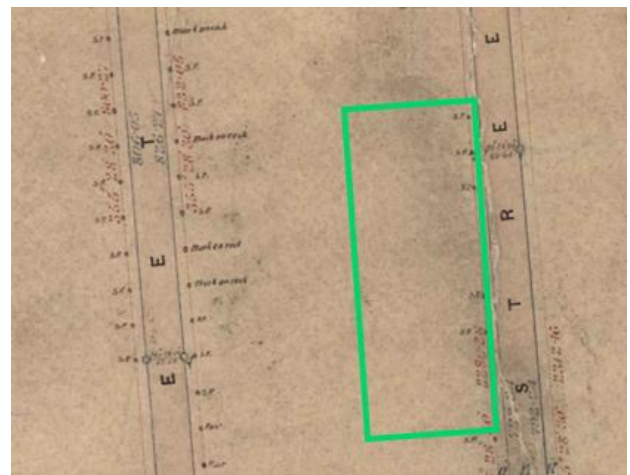


Figure 8 - 1890 crown plan with approximate location of the subject area (green outline). Various survey points are marked, but the entirety of Redan Street appears to remain undeveloped at this time.

Source: Crown Plan S.42.1990



Figure 9 - Sydney Water plan of the subject area, 1899.

Source: Sydney Water

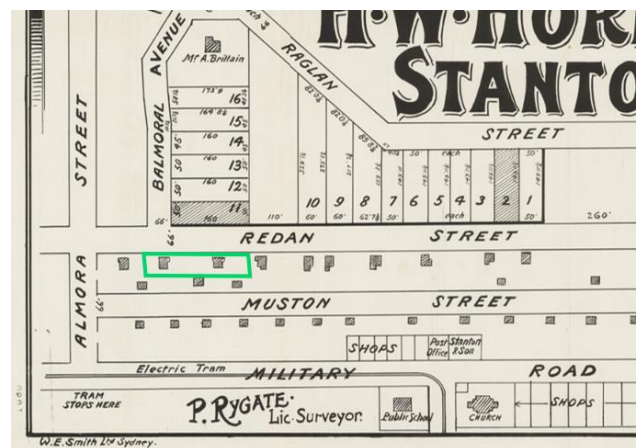


Figure 10 - Extract from 1902 subdivision of the Balmoral View Estate, Mosman.

Source: SLNSW <https://collection.sl.nsw.gov.au/digital/kD5eG2kZGbmwe>

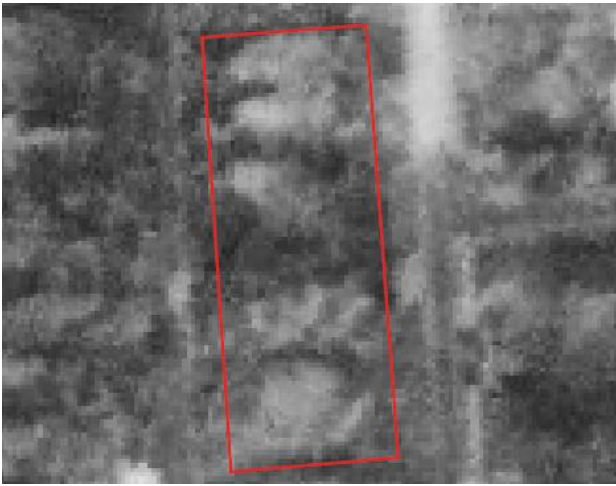


Figure 11 – 1930 aerial imagery of the subject area (red outline)

Source: Historical Imagery NSW



Figure 12 – 1951 aerial imagery of the subject area (red outline)

Source: Historical Imagery NSW



Figure 13 – 1965 aerial imagery of the subject area (red outline)

Source: Historical Imagery NSW



Figure 14 – 1978 aerial imagery of the subject area (red outline)

Source: Historical Imagery NSW



Figure 15 - 1986 aerial imagery of the subject area (red outline)

Source: Historical Imagery NSW



Figure 16 - 2025 aerial imagery of the subject area (red outline)

Source: Historical Imagery NSW]

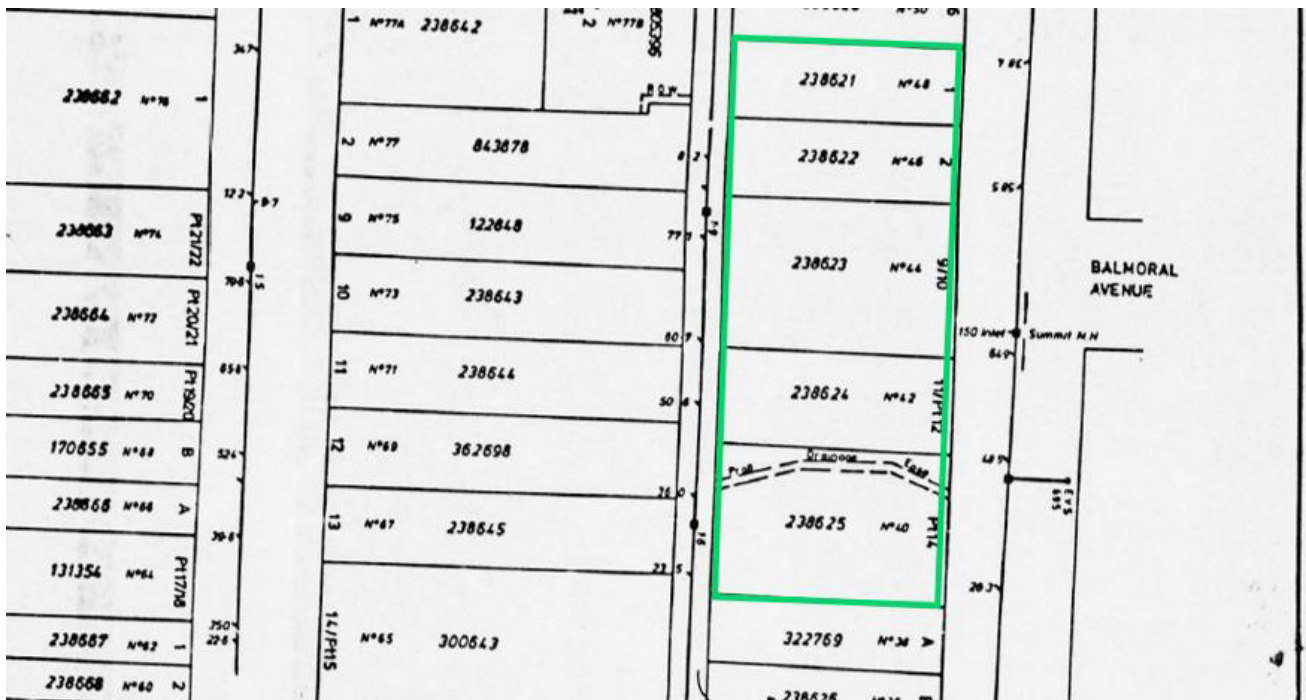


Figure 17 - Sydney Water plan of the subject area, 1982, showing easement for drainage through No. 40.

Source: Sydney Water

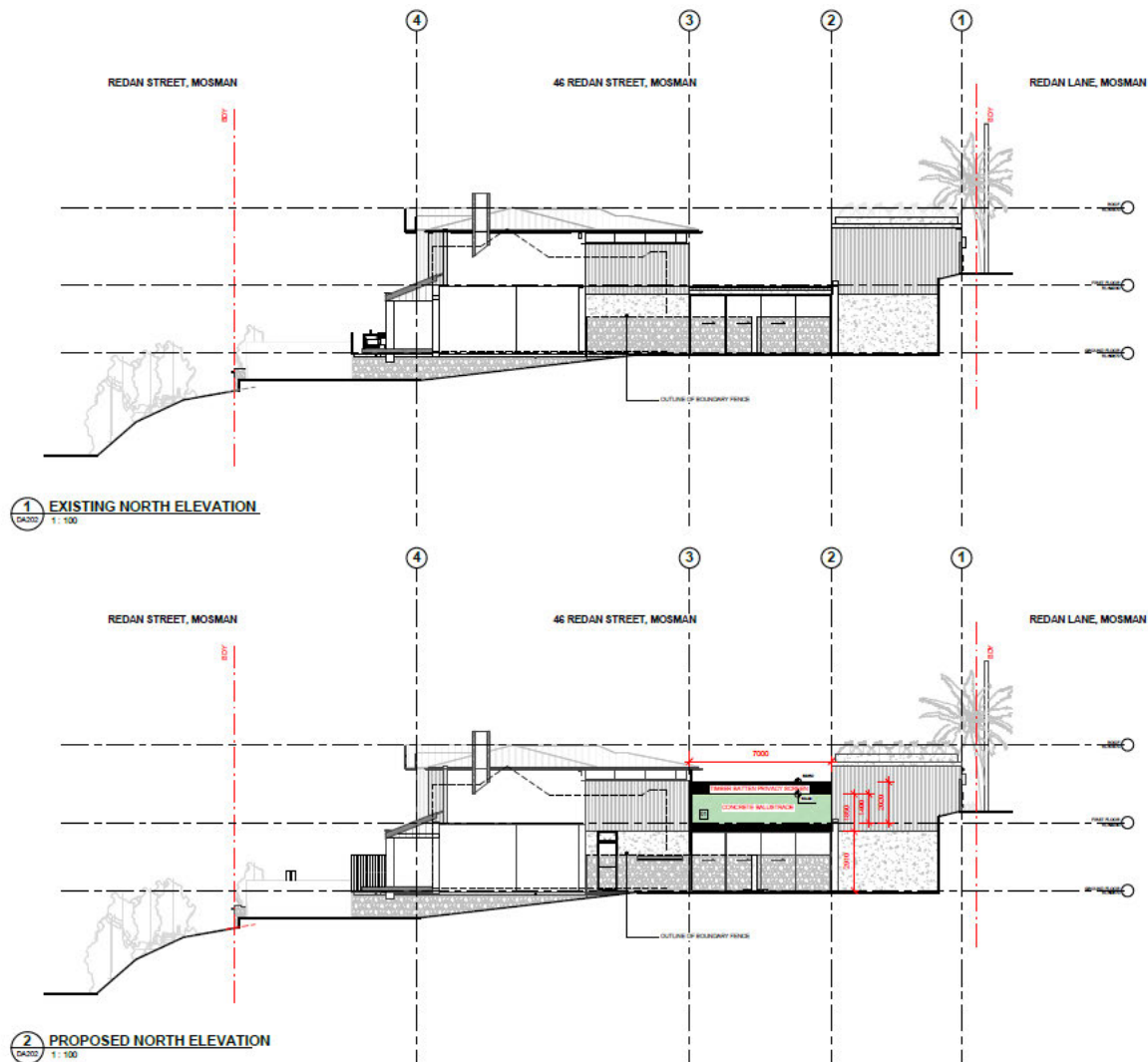


Figure 19 – Cross section of 46 Redan Street; north elevation

Source: Daniel Boddam Architecture & Interior Design, 2024; Drawing No. DA202 Rev No: A

3.3 Local & Regional Character

The evidence from Sections 3.1 and 3.2 is synthesised below to highlight the main issues and regional character of Aboriginal land use and the material traces that it has produced, in accordance with Requirement 11 of the Code of Practice.

The archaeological and environmental context of the subject area indicate use of the aquatic resources of Balmoral beach and the rock outcrops and overhangs of the local sandstone escarpments. Previously recorded sites include shell middens, rock art and artefacts that testify to the cultural landscape prior to colonisation.

3.4 Archaeological Potential

The Aboriginal archaeological potential of an area is the likelihood that it retains material evidence of past Aboriginal land use. The purpose of undertaking an assessment of Aboriginal archaeological potential is to inform the sampling strategy for the subsequent archaeological survey, to determine if an archaeological test excavation is required and, if so, inform the sampling strategy for that excavation.

3.4.1 Predictive Model

A predictive model for the present assessment has been formulated based on existing predictive models (Section 3.1.5) and the local and regional character summarised above (Section 3.3).

The following landscape features are considered relevant for indicating likely past Aboriginal land use in the region:

- Areas within 200 m of waters including freshwater and the high tide mark of shorelines.
- Areas located within a sand dune system.
- Areas located on a ridge top, ridge line or headland.
- Areas located within 200 m below or above a cliff face.
- Areas within 20 m of or in a cave, rock shelter, or a cave mouth.

The above predictive model is consistent with the Due Diligence Code.

Aboriginal archaeological potential is further dependent on erosional transport and historical ground disturbance. Archaeological material is more likely to accumulate in aggraded landforms than eroded landforms, while higher ground disturbance reduces the likelihood of archaeological material surviving.

Synthesising the above predictors, Aboriginal archaeological potential is rated according to the following scheme:

- **Very High:** at least one relevant landscape feature, low ground disturbance and an aggraded landform
- **High:** at least one relevant landscape feature and either: (i) low ground disturbance and an eroded landform; or (ii) moderate ground disturbance and an aggraded landform
- **Moderate:** at least one relevant landscape feature, moderate ground disturbance and an eroded landform
- **Low:** no relevant landscape features and low or moderate ground disturbance
- **Very Low:** high ground disturbance

Expected site features are based on the following associations landscape features:

- Rock outcrops

The predictive model described above is applied in the following section to determine the Aboriginal archaeological potential of the subject area and likely site features.

3.4.2 Assessment of Potential

Based on the predictive model outlined in the preceding section, the archaeological potential of the present subject area is assessed to be **low** to **very low**.

The subject area may have been the focus of Aboriginal activity in the past due to the likely presence of rock outcrops which may have been utilised for Art or grinding of tools. Potential rock overhangs may have been utilised for shelter.

Historical ground disturbance ranges from **moderate** to **high** (Section 3.2.1), meaning intact natural topsoils, if present, are likely to have been significantly disturbed or redeposited. Likewise, the original sandstone outcrops will have been heavily modified to allow for construction and landscaping during urban development.

Synthesising the above factors according to the archaeological rating scheme presented in the preceding section, it is determined that there is:

- **Low potential** in landscaped gardens, and lower slopes adjacent to Redan Street.
- **Very low potential** in locations terraced for construction of structures and level surfaces.

Aboriginal site features with potential to be retained within the subject area are Art and Artefacts. However, while the subject area may have retained these features prior to historic development, significant modification of the original environment is likely to have removed or displaced them.

3.5 Summary

The desktop assessment of the subject area is summarised as follows:

- There are no previously identified Aboriginal objects or declared Aboriginal places within the subject area.
- There are no relevant landscape features that were identified by the desktop assessment that indicate likely past Aboriginal land use according to the predictive model.
- The subject area has been subject to land clearance, earthworks, and construction activities associated with the extant 20th century buildings, and later modifications. Natural soils and rock outcrops if present are likely to have been significantly disturbed or displaced by terracing of the steep hill side.
- Based on the predictive model the archaeological potential of the present subject area is assessed to be **low** to **very low**.

4

Physical Assessment

4 Physical Assessment

Visual Inspection

A visual inspection was undertaken to confirm the assessment of archaeological potential within the subject area and to determine if any Aboriginal objects were present as surface expressions. The visual inspection of the subject area was undertaken on 03 November 2025 by Johnny Sokalik (Urbis Senior Heritage Consultant) and Frankie Kalaitzis (Time & Place).

The visual inspection was undertaken in sunny conditions. Ground Surface Visibility (GSV) was estimated to be <5% across the subject area with the majority being covered by existing residential properties, footpaths, and landscaping. Natural sandstone outcrops were exposed along the Redan Street frontage and within Redan Lane.

No Aboriginal objects were identified during the visual inspection of the subject area.

The observations made during the visual inspection were consistent with the desktop assessment of historical ground disturbance. The site sits on a sloping high point on Redan Lane that then dramatically slopes eastwards to Redan Street (Figure 20–Figure 31). The site has been cleared of the original vegetation, and no mature native trees were observed on the site.

Just outside the western and eastern boundaries of the subject area along Redan Street and Redan Lane, natural sandstone outcrops were visible above ground level, having been cut down to accommodate development along Redan Lane with likely large portions of the outcrops being removed along the Redan Street frontage to accommodate footpaths and garden beds (Figure 26–Figure 31). This suggests that the sandstone outcrops within the subject area, which would have been naturally higher than the ground level, have likely been cut down to facilitate residential development. No signs of rock art, grooves or markings were visible on the sandstone outcrops within the vicinity of the subject area (Figure 28–Figure 31).

The site had been significantly cut down to facilitate residential development which is clearly apparent to the rear of the properties along Redan Lane (Figure 22–Figure 25). Minimal sandstone outcrops remain along Redan Lane indicating the site was excavated substantially to the rear of the properties to level the area along the direction of the eastward slope with the property entry points along Redan Street (Figure 20–Figure 23).

It is therefore evident that the site has been subjected to substantial impacts as a result of the construction of the residential properties. It is highly likely that the entire A-horizon has been removed or significantly displaced as a result of these activities.



Figure 20 – View southwest towards the subject area along Redan Street.



Figure 21 – View west towards the central portion of the subject area along Redan Street.



Figure 22 – View south towards the rear of the properties along Redan Lane.



Figure 23 – View southeast towards the rear of one of the properties within the subject area from Redan Lane.



Figure 24 – View northwest of remnant sandstone along Redan Lane.



Figure 25 – View north of slope along Redan Lane with the subject area to the east (right).



Figure 26– View southwest of the subject area and Redan Street frontage



Figure 27 – View northwest of continuing slope along Redan Street along the southeast corner of the subject area.



Figure 28 – View west of sandstone outcrops in the vicinity of the subject area's eastern edge.



Figure 29 – View northeast of sandstone outcrops in the vicinity of the subject area's eastern edge.



Figure 30 – View northeast of sandstone outcrops in the vicinity of the subject area's eastern edge.

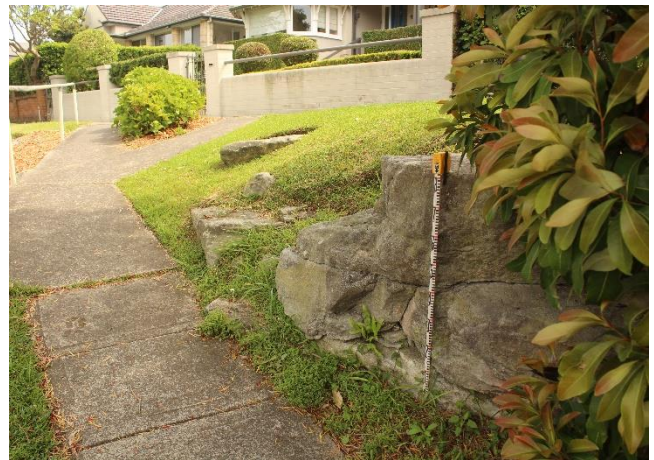


Figure 31 – View southeast of sandstone outcrops in the vicinity of the subject area's eastern edge.

5 Significance Assessment

The following is an assessment and discussion of the cultural significance of the subject area, made in consultation with the RAPs. The assessment follows principles and procedures outlined in the Burra Charter the Assessment Guidelines.

5.1 Framework for Assessment

The Burra Charter defines cultural significance as being derived from the following values: social or cultural value, historic value, scientific value and aesthetic value. Aesthetic, historic, scientific and social values are commonly interrelated. All assessments of heritage values occur within a social and historic context. Therefore, all potential heritage values will have a social component.

Heritage significance is assessed by considering each cultural or archaeological site against the significance criteria set out in the Assessment Guidelines. The Assessment Guidelines require that the assessment and justification in a statement of significance includes a discussion of whether any value meets the following criteria:

- 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.
- Is the subject area important in demonstrating aesthetic characteristics in the local area and/or region and/or state? – aesthetic value.

Assessment of each value should be graded in terms that allow the significance to be described and compared (e.g. high, moderate, or low). In applying these criteria, consideration should be given to:

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

The Aboriginal heritage significance of the subject area is assessed in the following section within the framework outlined above.

5.2 Assessment of Heritage Values

The following assessment of the social or cultural, historic, scientific and aesthetic values of the subject area has been prepared in accordance with the Assessment Guidelines.

In acknowledgment that the Aboriginal community themselves are in the best position to identify heritage values, the assessment is informed by consultation with the Aboriginal community undertaken as part of the ACHA (Section 2 above).

5.2.1 Social or Cultural Value

Social or cultural value encompasses the qualities for which a place has become a focus of spiritual, political, national or other cultural sentiment for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them. Places of social or cultural value have associations with contemporary community identity. These places can have associations with tragic or warmly remembered experiences, periods, or events. Communities can experience a sense of loss should a place of social or cultural value be damaged or destroyed. Social or cultural values can therefore only be identified through consultation with Aboriginal people.

No Cultural or cultural heritage values were reported during the consultation process for the project.

5.2.2 Historic Value

Historic value encompasses the history of aesthetics, science and society. A place may have historic value because it is associated with a historic figure, event, phase or activity in an Aboriginal community. The significance of a place will be greater where evidence of the association or event survives in situ, or where the settings are substantially intact, than where it has been changed or evidence does not survive. However, some events or associations may be so important that the place retains significance regardless of subsequent treatment. Places may also have 'shared' historic values with other (non-Aboriginal) communities.

No historical associations between Aboriginal people and the subject area have been identified. The subject area is therefore unlikely to have historic value insofar as it relates to Aboriginal cultural heritage.

5.2.3 Scientific (Archaeological) Value

Scientific value relates to the importance of a landscape, area, place or object because of its rarity, representativeness and the extent to which it may contribute to further understanding and information. Information about scientific value will be gathered through any archaeological investigation undertaken.

There is low potential for archaeological resources to be retained within the subject area. On this basis the subject area is provisionally assessed as having low scientific value. Should any Aboriginal objects be identified within the subject area during the proposed works, the scientific (archaeological) value of those objects should be assessed.

5.2.4 Aesthetic Value

Aesthetic value of a place relates to the sensory, scenic, architectural and creative aspects of a place. It may include visual aspects, such as form, scale, colour, texture and material of the fabric, and the smells and sounds associated with the place and its use.

It is evident that the natural form of the subject area has been altered through land clearance and modification of the landscape for construction. The subject area therefore does not retain aesthetic value insofar as it relates to Aboriginal cultural heritage.

Individual Aboriginal objects may have aesthetic value in their own right. There are no known Aboriginal objects within the subject area that could be assessed for aesthetic value. In the event that any Aboriginal objects are identified within the subject area during the proposed works, these should be assessed for aesthetic value.

5.3 Statement of Significance

The subject area has not been identified as having social and cultural significance to the local Aboriginal community. The assessment of significance is further reduced due to the absence of any known Aboriginal sites or evidence of a specific cultural association with the subject area itself, and due to historical ground disturbance.

The assessment of significance should be updated in the event that any Aboriginal objects are found within the subject area during the proposed works.

6

Impact Assessment

6 Impact Assessment

The following is an assessment of the potential impact of the proposed development on any Aboriginal objects and/or Aboriginal places within the subject area and the possible strategies for avoiding or minimising harm to those Aboriginal objects and/or Aboriginal places.

6.1 Framework for Assessment

The potential harm to Aboriginal objects and Aboriginal places that is likely to be caused by a proposed activity is the effect of that activity on the Aboriginal heritage values identified above. According to the NPW Act, 'harm' to an object or place includes any act or omission that:

- Destroys, defaces, or damages the object or place.
- Moves the object from the land on which it had been situated.
- Causes or permits the object or place to be harmed.

Harm does not include something that is trivial or negligible, such as picking up and replacing a small stone artefact, breaking a small Aboriginal object below the surface when you are gardening, crushing a small Aboriginal object when you walk on or off a track, picnicking, camping or other similar recreational activities.

The Assessment Guidelines define harm to Aboriginal objects and Aboriginal places as being either 'direct' or 'indirect':

- **Direct harm** may occur as the result of any activity which disturbs the ground including, but not limited to, site preparation activities, installation of services and infrastructure, roadworks, excavation, flood mitigation measures.
- **Indirect harm** may affect sites or features located immediately beyond or within the area of the proposed activity. Examples include, but are not limited to, increased impact on art in a shelter from increased visitation, destruction from increased erosion and changes in access to wild food resources.

The present assessment of potential harm follows the principles of ecologically sustainable development (ESD), in particular the precautionary principle and the principle of inter-generational equity:

- The **precautionary principle** states that full scientific certainty about the threat of harm should never be used as a reason for not taking measures to prevent harm from occurring.
- The **principle of inter-generational equity** holds that the present generation should make every effort to ensure the health, diversity and productivity of the environment, which includes cultural heritage, is available for the benefit of future generations. If a site type that was once common in an area becomes rare, the loss of that site (and site type) will result in an incomplete archaeological record and will negatively affect intergenerational equity.

Consideration of potential harm to Aboriginal objects and Aboriginal places according to ecologically sustainable development (ESD) principles allows for an understanding of the cumulative impact of the proposed activity and an understanding of how harm can be avoided or minimised, if possible.

6.2 Assessment of Potential Harm

The assessment of potential harm considers harm that may occur to both known Aboriginal objects and as yet unknown Aboriginal objects within the subject area.

The desktop assessment and site inspection identified no known Aboriginal objects within the subject area. The subject area has been assessed as having low Aboriginal archaeological potential due to moderate to high levels of disturbance through previous modification of the steep landscape for construction purposes. It is unlikely that unknown Aboriginal objects will be impacted by the proposed development.

6.3 Inter-Generational Equity

The cumulative impact of any development on Aboriginal sites relates to the extent of the proposed impact on the site and how this will affect both the proportion of this type of Aboriginal site in the area and the impact this destruction will have on Aboriginal cultural heritage values generally in the area.

As there are no known Aboriginal objects within the site, the present impacts to intergenerational equity would be considered nil.

6.4 Avoidance & Minimisation of Harm

All practicable measures must be taken to avoid harm (i.e. protect and conserve) any significant Aboriginal objects within the subject area along with their cultural heritage values. The precautionary principle states that full scientific certainty about the threat of harm should never be used as a reason for not taking measures to prevent harm from occurring.

If harm to Aboriginal objects and/or Aboriginal places is unavoidable, management strategies must be considered to minimise the harm. The type of management strategies proposed must be appropriate to the significance of Aboriginal heritage values, Aboriginal objects and/or Aboriginal places. Harm avoidance and minimisation measures must be feasible and within the financial viability of the proposed activity.

The desktop assessment and site inspection identified no known Aboriginal objects within the subject area. The subject area has been assessed as having low Aboriginal archaeological potential due to high levels of disturbance through previous modification of the steep landscape for construction purposes. It is unlikely that unknown Aboriginal objects will be impacted by the proposed development.

7

Conclusion and Recommendations

7 Conclusions & Recommendations

The ACHA concluded that:

Conclusion 1 – Known Aboriginal Objects and Places

No known Aboriginal objects or Aboriginal places have been identified that are within the curtilage of the subject area.

Conclusion 2 – Sensitive Landscape Features

Although rock outcrops may once have existed within the subject area and served as a focus of activity in the past, the scale and extent of modern excavation and levelling are considered to have very likely removed any such features.

Conclusion 3 – Ground Disturbance

Ground disturbance associated with urban development includes modification for roads, terracing of the steep hillside for construction and landscaping, and provision of underground services to the residences. This has involved significant disturbance to the shallow soil profile and to the bedrock itself.

Conclusion 4 – Archaeological Potential

Applying the predictive model, the Aboriginal archaeological potential of the subject area is assessed to be very low to low.

Conclusion 5 – Significance Assessment

The subject area has not been identified as having social and cultural significance to the local Aboriginal community.

Conclusion 6 – Impact Assessment

As the proposed ground disturbing works encompass an area of low potential, the proposed development is unlikely to cause direct harm to Aboriginal objects.

Based on the above conclusions, Urbis recommends the following:

Recommendation 1 – Submission of Report

A copy of this report should be submitted with the Environmental Impact Statement (EIS) in support of SSD-93020230.

Recommendation 2 – Unexpected Finds Protocol: Archaeological Material

In the event that any archaeological material is uncovered during any site works, the following steps must be carried out:

- (a) All works must halt in the immediate area of the find to prevent any further impacts to the archaeological material.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist and the Registered Aboriginal Parties for the ACHA must be contacted to determine the significance of the objects.
- (d) If determined to be an Aboriginal object, the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) and the management outcome for the site included in the information provided to AHIMS.
- (e) Depending on the significance of the find, reassessment of the archaeological potential of the subject area may be required and further archaeological investigation undertaken.
- (f) The Applicant must consult with the Aboriginal community representatives, the archaeologist(s) and Heritage NSW to develop and implement management strategies for all Aboriginal objects.

(g) Works may only recommence in the vicinity of the find with the approval of Heritage NSW.

Recommendation 3 – Unexpected Finds Protocol: Human Remains

In the event that clearly identifiable human remains are uncovered during any site works, the following steps must be carried out:

- (a) All works must cease immediately in that area and the NSW Police and Heritage NSW contacted.
- (b) The find must not be moved 'out of the way' without assessment.
- (c) A suitably qualified archaeologist must be contacted to determine the specific nature and significance of the skeletal remains.
- (d) The Applicant must consult with relevant stakeholders, the archaeologists and Heritage NSW to develop and implement appropriate management strategies for the human remains.
- (e) Works shall only recommence with the approval of Heritage NSW.

8

References

8 References

- AMBS, 2005. Aboriginal Heritage Study of the Mosman Local Government Area
- Attenbrow, V 2010, *Sydney's Aboriginal Past, 2nd Edition*, University of New South Wales Press, Sydney: Australia
- Attenbrow, V. 1990. *The Port Jackson Archaeological Project, Stage I: a study of the Port Jackson Catchment*
- Attenbrow, 1992, 1993, 1994, 1995. *Archaeological Excavation of a rockshelter at the southern end of Balmoral Beach, Mosman*
- Attenbrow & Ross, 1990. *Archaeological Site Survey: Bradley's Head*
- Australia ICOMOS Incorporated 2013, *The Burra Charter, The Australia ICOMOS Charter for Places of Cultural Significance*
- Clarkson, C., Jacobs, Z., Marwick, B., Fullagar, R., Wallis, L., Smith, M., Roberts, R.G., Hayes, E., Lowe, K., Carah, X., Florin, S.A., McNeil, J., Cox, D., Arnold, L.J., Hua, Q., Huntley, J., Brand, H.E.A., Manne, T., Fairbairn, A., Shulmeister, J., Lyle, L., Salinas, M., Page, M., Connell, K., Park, G., Norman, K., Murphy, T. and Pardoe, C. 2017, *Human occupation of northern Australia by 65,000 years ago*, *Nature*, vol. 547, pp. 306–310
- Department of Environment Climate Change and Water (DECCW) 2010a, *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*
- DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*
- DECCW 2010c, *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*
- DECCW, 2010d. *Aboriginal Heritage of Mosman*
- Environmental Planning and Assessment Act 1979*
- Environment Protection and Biodiversity Conservation Act 1999*
- Heritage Act 1977 (NSW)*
- Koettig, M. 1991. *Mosman Municipality Heritage Study of Aboriginal Sites*
- National Parks and Wildlife Act 1974*
- National Parks and Wildlife Regulation 2019*
- Office of Environment and Heritage (OEH) 2011a, *Applying for an Aboriginal Heritage Impact Permit guide for applicants*
- OEH 2011b, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*

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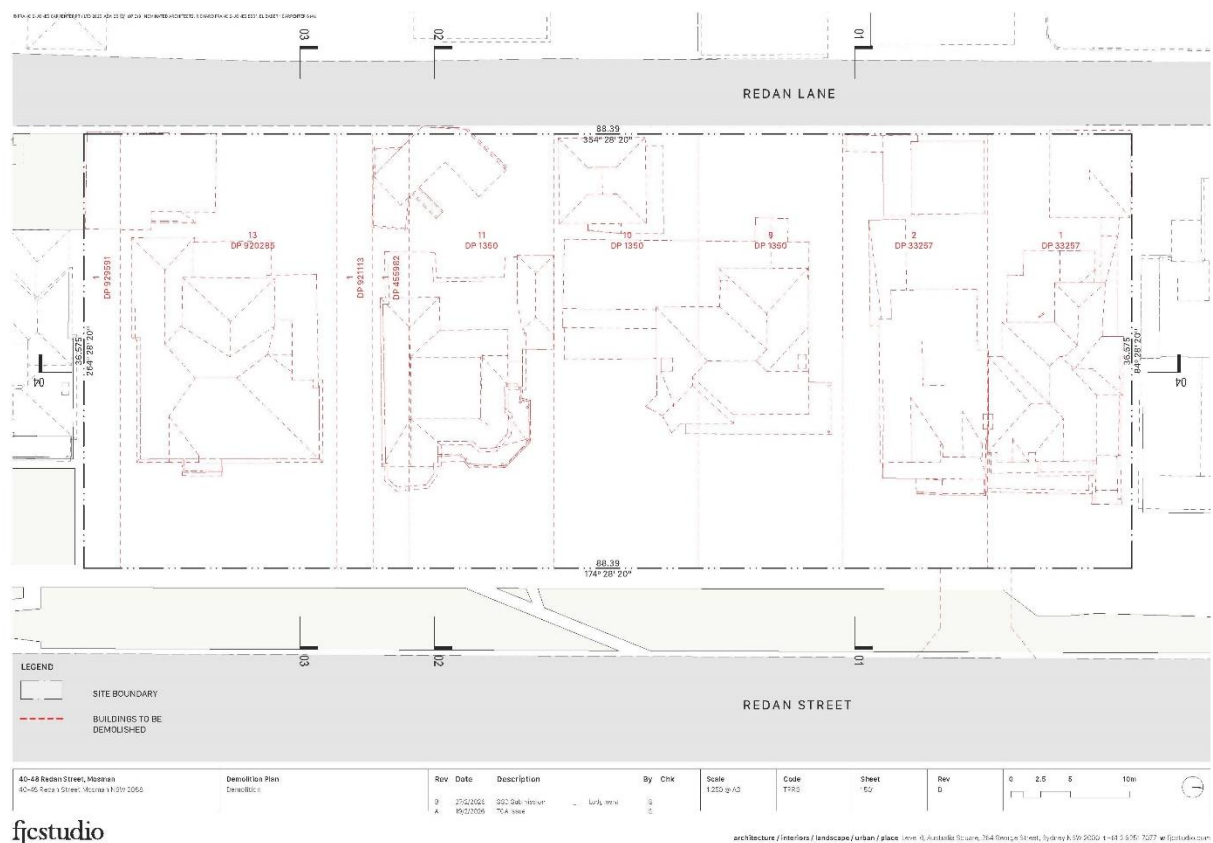
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Appendix A: Select Development Plans



Source: FJC Studio, Revision B, 27/02/2026.



Source: FJC Studio, Revision B, 27/02/2026.

Appendix B: Basic and Extensive AHIMS Search Results



AHIMS Web Services (AWS) Search Result

Your Ref/PO Number : 40-48 Redan St, Mosman
Client Service ID : 1038326

Urbis Pty Ltd - Angel Place L8 123 Pitt Street

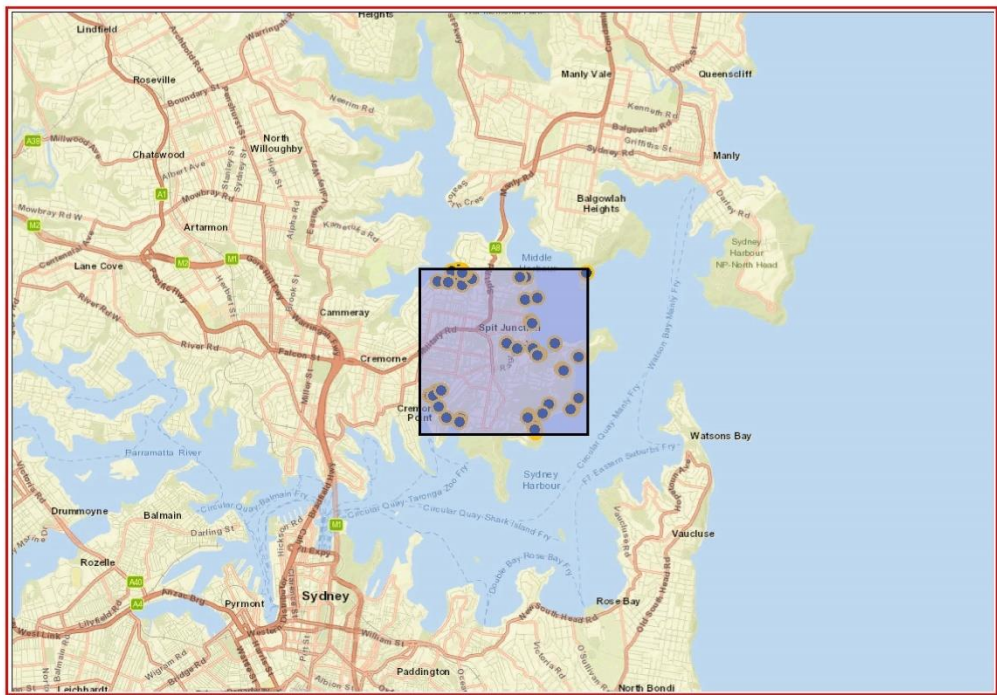
Date: 28 August 2025

Level 8 123 Angel Street
Sydney New South Wales 2000
Attention: Jordan Gilbert
Email: jgilbert@urbis.com.au

Dear Sir or Madam:

AHIMS Web Service search for the following area at Datum :GDA, Zone : 56, Eastings : 336219.8754 - 339219.8754, Northings : 6254023.025 - 6257023.025 with a Buffer of 0 meters, conducted by Jordan Gilbert on 28 August 2025.

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



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

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

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

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

Important information about your AHIMS search

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

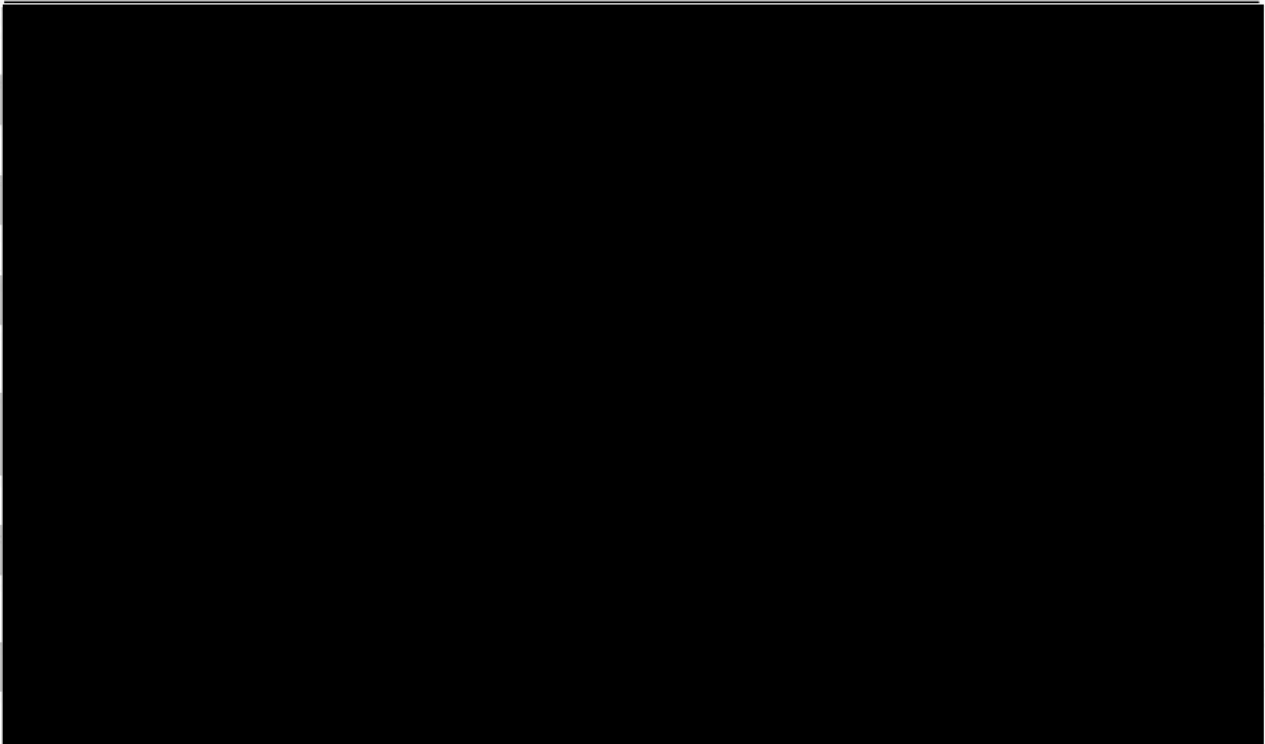
Level 6, 10 Valentine Ave, Parramatta 2150
Locked Bag 5020 Parramatta NSW 2124
Tel: (02) 9585 6345

ABN 34 945 244 274
Email: ahims@environment.nsw.gov.au
Web: www.heritage.nsw.gov.au



AHIMS Web Services (AWS)
Extensive search - Site list report

Your Ref/PO Number : 40-48 Redan St, Mosman
Client Service ID : 1038327



Report generated by AHIMS Web Service on 28/08/2025 for Jordan Gilbert for the following area at Datum :GDA, Zone : 56, Eastings : 336219.8754 - 339219.8754, Northings : 6254023.025 - 6257023.025 with a Buffer of 0 meters. Number of Aboriginal sites and Aboriginal objects found is 50

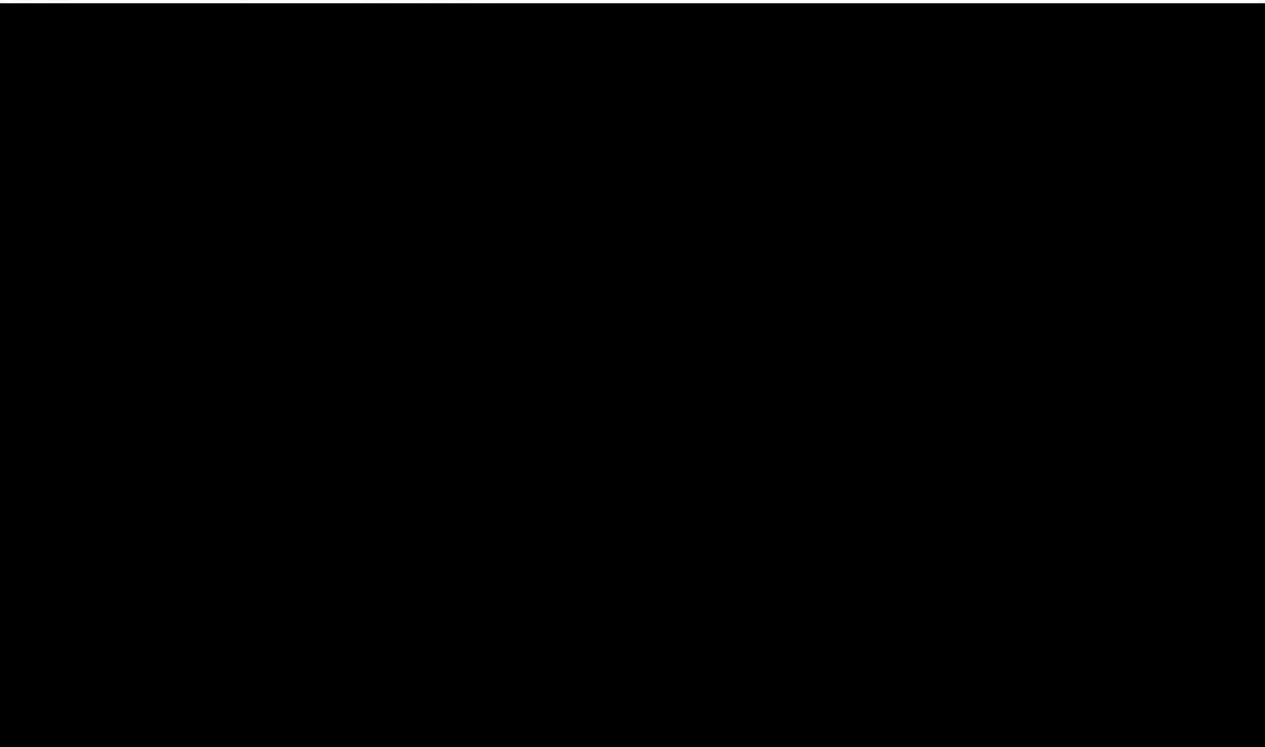
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Page 1 of 4



AHIMS Web Services (AWS)
Extensive search - Site list report

Your Ref/PO Number : 40-48 Redan St, Mosman
Client Service ID : 1038327



Report generated by AHIMS Web Service on 28/08/2025 for Jordan Gilbert for the following area at Datum :GDA, Zone : 56, Eastings : 336219.8754 - 339219.8754, Northings : 6254023.025 - 6257023.025 with a Buffer of 0 meters. Number of Aboriginal sites and Aboriginal objects found is 50

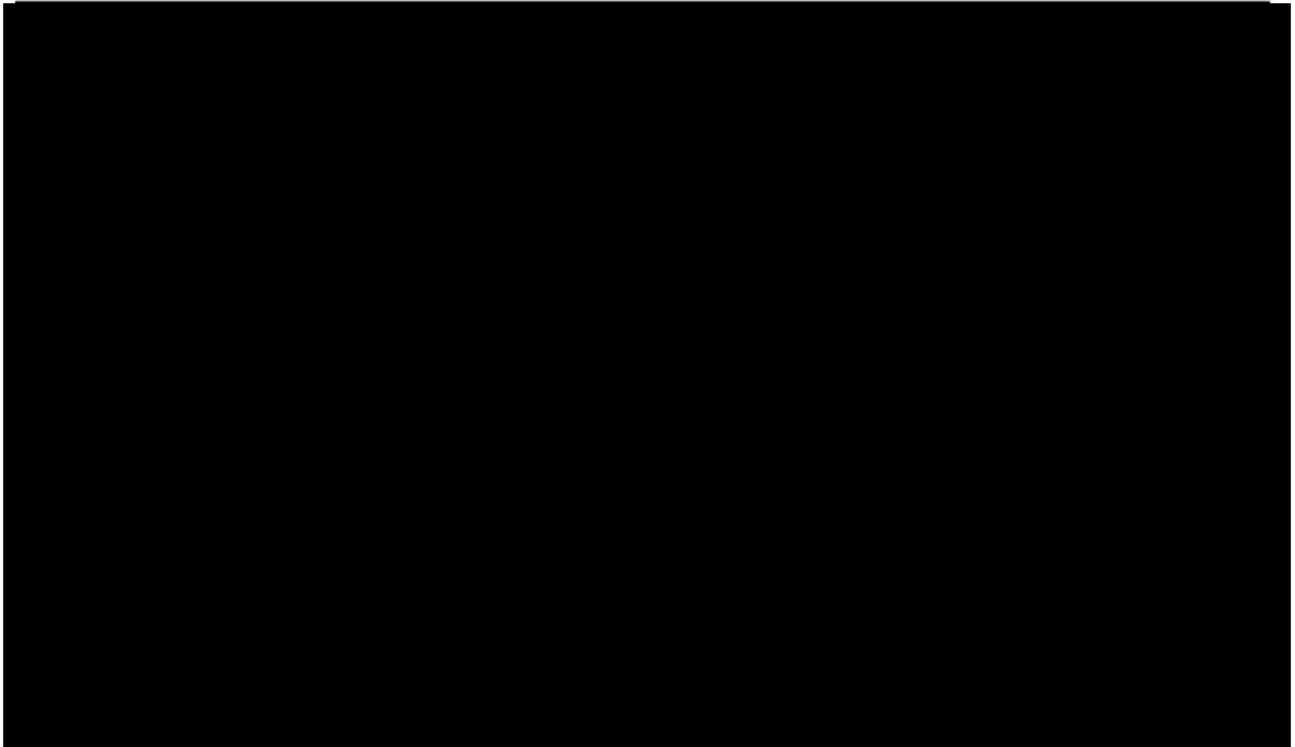
This information is not guaranteed to be free from error omission. Heritage NSW and its employees disclaim liability for any act done or omission made on the information and consequences of such acts or omissions.

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AHIMS Web Services (AWS)
Extensive search - Site list report

Your Ref/PO Number : 40-48 Redan St, Mosman
Client Service ID : 1038327



Report generated by AHIMS Web Service on 28/08/2025 for Jordan Gilbert for the following area at Datum :GDA, Zone : 56, Eastings : 336219.8754 - 339219.8754, Northings : 6254023.025 - 6257023.025 with a Buffer of 0 meters. Number of Aboriginal sites and Aboriginal objects found is 50

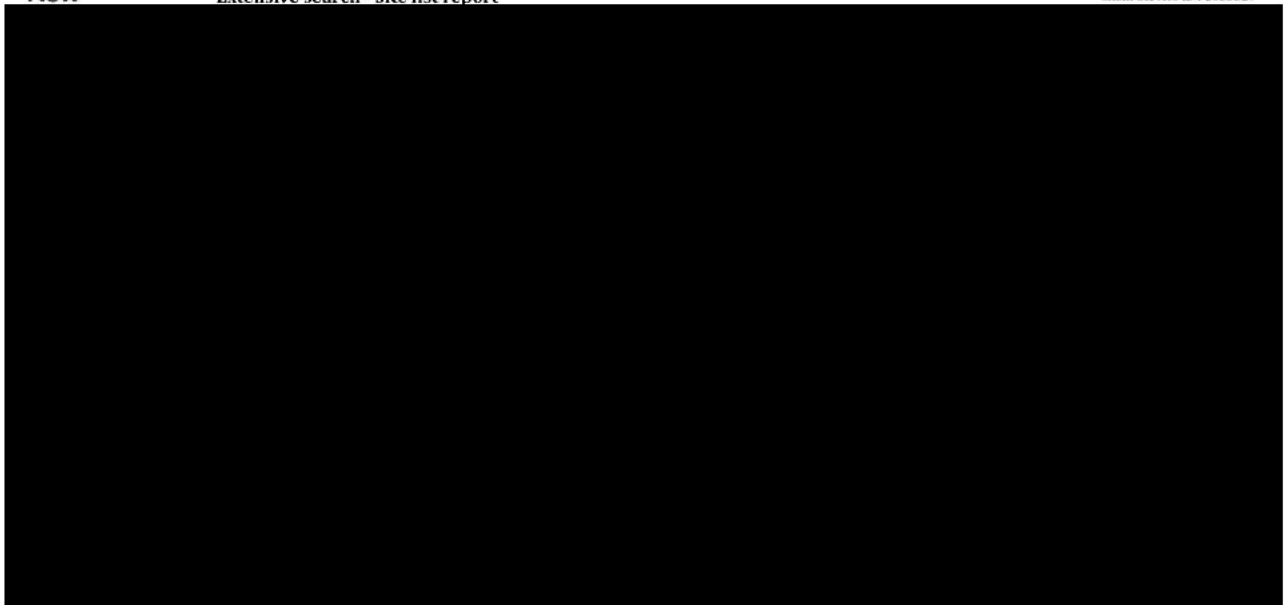
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AHIMS Web Services (AWS)
Extensive search - Site list report

Your Ref/PO Number : 40-48 Redan St, Mosman
Client Service ID : 1038327



Site Status

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

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

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

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

Report generated by AHIMS Web Service on 28/08/2025 for Jordan Gilbert for the following area at Datum :GDA, Zone : 56, Eastings : 336219.8754 - 339219.8754, Northings : 6254023.025 - 6257023.025 with a Buffer of 0 meters. Number of Aboriginal sites and Aboriginal objects found is 50

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Appendix C: Registered Aboriginal Party Consultation Log

Date	Time	Mode	Contacted Party	Contacting Party
Stage 1.1 – Native Title				
27 August 2025	10:56am	Email	National Native Title Tribunal	Urbis
27 August 2025	11:30am	Web search	N/A	N/A
27 August 2025	11:35am	Web search	N/A	N/A
27 August 2025	3:59pm	Email	Urbis	National Native Title Tribunal
Stage 1.2 – Identifying Aboriginal Parties				
27 August 2025	10:47am	Email	All Agencies	Urbis
27 August 2025	12:46pm	Email	Urbis	LSS GS
28 August 2025	2:38pm	Email	Urbis	ORALRA
28 August 2025	2:53pm	Email	Urbis	Mosman council
2 September 2025	12:06pm	Email	Urbis	HNSW
Stage 1.3 – Registration of Aboriginal Parties				
10 September 2025	12:00am	Email	General Public	Urbis
10 September 2025	8:46am	Email	All identified RAPS	Urbis
10 September 2025	12:30pm	Email	Urbis	[REDACTED]
10 September 2025	1:57pm	Email	Urbis	[REDACTED]
10 September 2025	1:58pm	Email	Urbis	[REDACTED]
10 September 2025	3:43pm	Email	Urbis	[REDACTED]
11 September 2025	1:50am	Email	Urbis	[REDACTED]
11 September 2025	7:01am	Email	Urbis	[REDACTED]
12 September 2025	8:24pm	Email	Urbis	[REDACTED]
15 September 2025	1:29pm	Email	Urbis	[REDACTED]
21 September 2025	6:34pm	Email	Urbis	[REDACTED]

Stage 1.6 – Provision of RAP Details

24 September 2025	10:0am	Email	HNSW	Urbis
24 September 2025	10:01am	Email	MLALC	Urbis

Stage 2/3 – Provision of Project Information & Methodology

24 September 2025	9:33am	Email	Registered RAPs	Urbis
27 September 2025	10:36pm	Email	Urbis	[REDACTED]
17 October 2025	8:42am	Email	Urbis	[REDACTED]

Invitation to Site Visit

28 October 2025	4:57pm	Email	[REDACTED]	Urbis
28 October 2025	8:18pm	Email	Urbis	[REDACTED]
31 October 2025	11:56am	Email	[REDACTED]	Urbis
3 November 2025	2:10pm	Phone	[REDACTED]	Urbis

Stage 4 – Provision of Draft ACHA

17/11/2025	8:58 AM	Email	All RAPs in register	Urbis
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Appendix D: Registered Aboriginal Party Consultation Documentation



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and communities
for a better future.**

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