Coast
HISTORY & HERITAGE

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13 May 2021

Kincoppal-Rose Bay School
c/- Terry Mahady
Mahady Management

Dear Mr Mahady,

RE: Kincoppal-Rose Bay School, 1A and 2 Vaucluse Road, Vaucluse NSW
Additional Aboriginal heritage advice

In 2020, Coast History and Heritage (Coast) completed the report 'Aboriginal cultural heritage assessment report: Detailed and concept development, Kincoppal-Rose Bay School, 1A and 2 Vaucluse Road, Vaucluse (Woollahra LGA)'. The report was submitted to the Department of Planning, Industry and Environment as part of the Environmental Impact Statement (EIS) for a proposed program of works at the school (SSD 10325).

Heritage NSW reviewed the relevant sections of the EIS, and provided nine recommendations in relation to Aboriginal cultural heritage regulation matters (**Table 1**). This letter has been prepared to provide additional detail to assist with the Heritage NSW assessment of the EIS. It includes an updated search of the Aboriginal Heritage Information Management System (AHIMS), and additional detail on the potential impact of the development components that are in areas of high and moderate Aboriginal archaeological sensitivity. It is informed by the results of geotechnical investigation, and by an updated set of architectural plans both of which were undertaken after the ACHAR was completed.

Table 1. Recommendations provided by Heritage NSW

No.	Recommendation
1	As searches of the Aboriginal Heritage Information Management System (AHIMS) are valid for 12 months and the original search was undertaken on 9 July 2019, an updated search is required.
2	Clarification should be sought regarding the exact extent and depth of proposed impacts. Additionally, confirmation on whether any ground disturbance is proposed for the early learning centre – Additional Carparking as shown in Figure 6 of the EIS (Umwelt 2020) and whether this impact has been assessed by the ACHAR is needed.
3	Detailed design should be undertaken to avoid impact to KRB Rockshelter (AHIMS #45-6-3754) and minimise impact to areas of moderate and high archaeological potential.
4	If avoidance of the areas of moderate and high archaeological potential is not possible, a systematic subsurface testing program needs to be undertaken under an Aboriginal Heritage

No.	Recommendation
	Impact Permit (AHIP) due to the proximity to a rockshelter and potential for rockshelter deposits and rock art to be encountered. The testing needs to target areas proposed for impact as part of the development works and within areas expected to contain intact A horizon and/or over areas where rock outcropping is expected but visibility is limited to identify potential art or grinding groove sites. Figure 52 and 53 of the ACHAR (Coast 2020, p.78 and 90) identifying potential Aboriginal heritage impact should be used to guide test excavations and should be updated to reflect the results of the subsurface testing and the final development designs if any changes are made.
5	If avoidance of the rockshelter is not possible, test excavations under an AHIP must occur within KRB Rockshelter (AHIMS #45-6-3754) to confirm the presence or absence of subsurface archaeological deposits.
6	We recommend the subsurface testing program be undertaken prior to development approval so as to inform the potential of the areas to contain Aboriginal objects, whether future salvage excavation is required and to allow the proponent to redesign the project to avoid any significant objects or sites if necessary.
7	Following a subsurface testing program, the ACHAR needs to be updated to document the results of the testing and reassessment of the impacts to Aboriginal cultural heritage values.
8	An Aboriginal Cultural Heritage Management Plan will need to be prepared in consultation with Heritage NSW and the RAPs to address unexpected finds and outline the management and mitigation measures required before, during and after construction.
9	Consultation with the Registered Aboriginal Parties (RAP) must continue in line with the Aboriginal cultural heritage consultation requirements for proponents 2010.

1 AHIMS search

Recommendation 1

A search of AHIMS was undertaken on 2 March 2021.[1] The search covered an area of 7x4km, centred on the study area. The results are included in **Appendix 1** and shown in **Figure 1** and **Figure 2**. The results indicate that there is one registered site within the study area: AHIMS #45-6-3754 (KRB Rockshelter). This is the possible Aboriginal archaeological site that was identified during the preparation of the 2020 ACHAR.

[1] AHIMS Client Service ID 572618

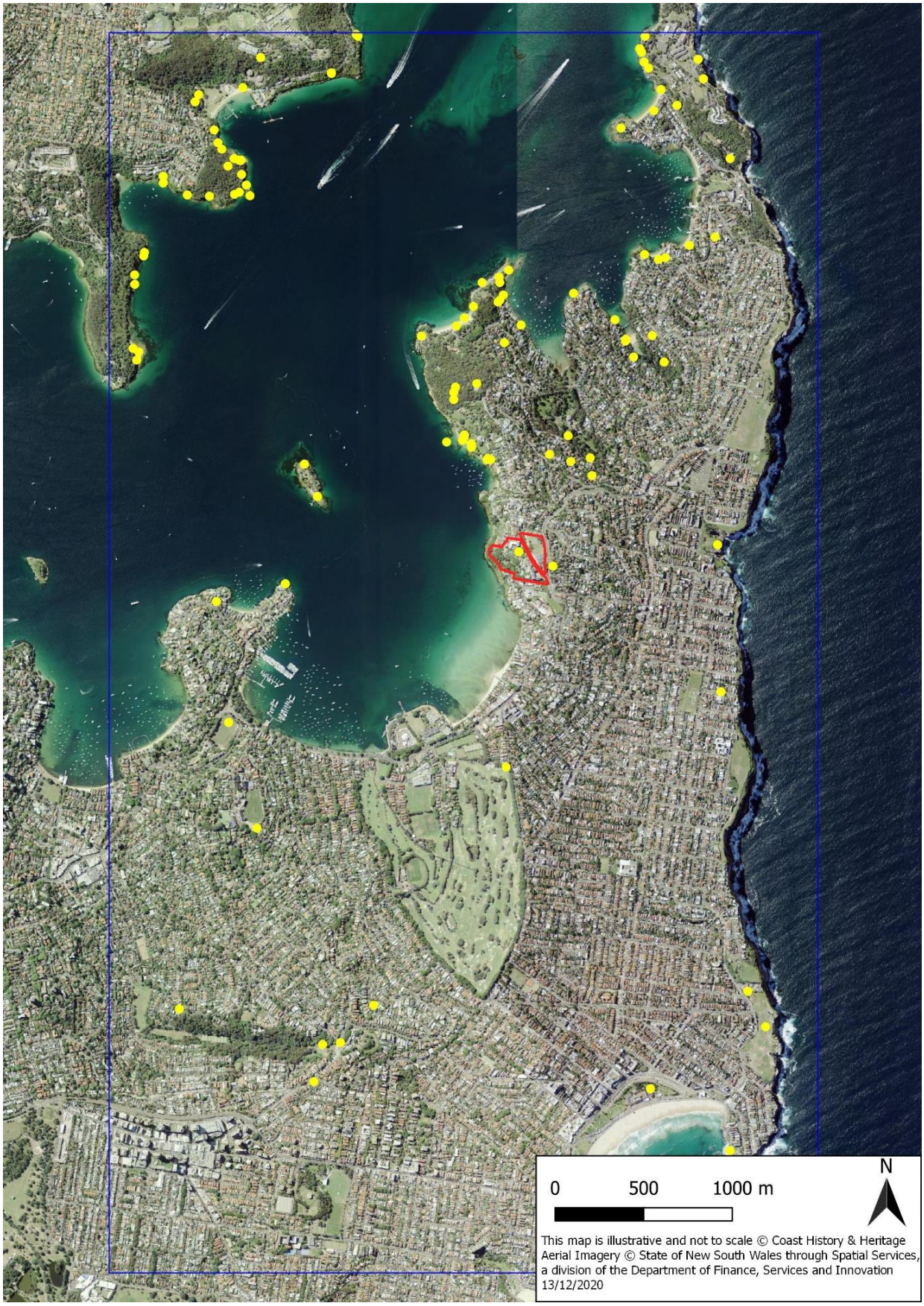

Figure 1. The results of the AHIMS search

Figure 2. Detail of the results of the AHIMS search

2 Geotechnical investigation

Since completion of the ACHAR, a program of geotechnical investigation has been undertaken (**Figure 3**). The geotechnical investigation has provided information on the subsurface conditions for the locations where deeper and/or more extensive excavation will be required as part of the proposed works. The results can be compared against the expected soil profile for the landscape, and, to an extent, against the results of the previous historical archaeological monitoring program on the eastern part of the school campus.

The proposed works are within an area mapped as Hawkesbury Soil Landscape.[2] In this landscape, outcropping sandstone can be expected over greater than 50% of the ground surface. The characteristic soil units are described, in summary, as follows:

- A1 horizon (ha1). Loose, coarse quartz sand, varying in colour from brownish-black to dull yellow orange and often becoming lighter with depth. Inclusions may comprise sandstone fragments, charcoal fragments, and roots.
- B or C horizon (ha2). Clayey sand to sandy clay loam, yellowish-brown to yellow-orange in colour. Inclusions may comprise gravels, stones, and ironstone-plated sandstone fragments. Roots and charcoal fragments are rare.
- B or C horizon (ha3). Sandy clay loam to medium clay, generally pale in colour, ranging from bright reddish brown to light grey, and often with mottles. Inclusions may comprise ironstone gravels. Roots and charcoal fragments are rare.

In general, the soil profile is quite shallow and vulnerable to erosion. On crests and ridges, the soil profile may comprise up to 20cm of topsoil overlying bedrock, or overlying up to 30cm of subsoil. On sideslopes and benches, soils are discontinuous. On the outside of benches, 10-30cm of A horizon overlies bedrock; on the higher side of benches, 5-15cm of A horizon overlies up to 50cm of subsoil. Deep soils may be present in crevices such as joint lines. Along drainage lines, either exposed bedrock may be present, or a soil profile generally less than 100cm in depth.

The eastern campus falls predominantly within an area mapped as the Lambert Soil Landscape. Although the topography of this landscape is different, the soil profile and extent of outcropping bedrock is roughly comparable to the Hawkesbury Soil Landscape. The results of historical archaeological monitoring in this part of the school confirmed that the landscape had been considerably modified.[3] On the eastern side, the ground had been cut down to and into the C Horizon (sandstone) in many places, and on the western side there was evidence of both cut and fill. In a few locations, the original soil profile remained, mainly in the west and generally between bedrock fissures. Where present, this comprised a thin black brown soil (A Horizon), overlying a thin pale sandy soil (A2 Horizon), over increasingly sandy soils, decomposing bedrock and sandstone bedrock (B and C Horizons).

[2] Chapman & Murphy 1989

[3] Tuck 2009b: 1.

Figure 3. Location of the geotechnical boreholes

3 Potential impact

An updated architectural set has been prepared since the ACHAR was completed. The information in these drawings, together with the data from the geotechnical investigation, has been used in the following sections. These provide additional detail on the potential Aboriginal heritage impact of the proposed development in the identified areas of high and moderate sensitivity (**Figure 4**). The development components are numbered following the architectural set.

Figure 4. The location of the proposed works in the areas of high and moderate sensitivity (excluding the landscaping works in Section 3.2.6)

3.1 High archaeological sensitivity

One area of high Aboriginal archaeological sensitivity was identified during preparation of the ACHAR. This is the possible Aboriginal archaeological site that has been registered as AHIMS #45-6-3754 (KRB Rockshelter). One component of the proposed development is located in proximity to this location:

- Boarding Accommodation – Extension (Item 14)

This component is part of the Concept Design package of works, so detailed design has not been undertaken. However, additional investigation has been undertaken to confirm that the structure can be built without any ground disturbance within the site.

The proposed structure will be located to the west of the existing internal road that runs along the front of (to the west of) AHIMS #45-6-3754 (KRB Rockshelter). A raised walkway will connect level 3 of the structure with the existing footpath above and to the east of AHIMS #45-6-3754. The proponent has confirmed with their structural engineer, Henry and Hymas, that it will be possible to construct the walkway as a suspended structure, that will not require footings in the area of the roof of the rock overhang.[4]

The proposed development is therefore unlikely to result in direct impact to the possible site AHIMS #45-6-3754 (KRB Rockshelter). Given the small size of the site, it is not considered appropriate to conduct archaeological test excavations in the absence of any proposed development impact, as this would lead to unnecessary disturbance to the shelter.

3.2 Moderate archaeological sensitivity

The following components of the proposed development will involve ground disturbance and are located within an area of moderate archaeological sensitivity:[5]

- Early Learning Centre Extension and Additional Carparking (Item 1)
- Senior School – Main Entry Forecourt, Landscaping and Accessible Entry Ramp (Item 7)
- Traffic Management- Proposed Secondary Entry, Pick Up and Drop Off and Elevated Foot Bridge (Item 9)
- Traffic Management – Proposed Pick Up and Drop Off with Widening of Exit Road (Item 10)
- Traffic Management - Bus and Car Parking (Item 13)
- Junior School: modifications to play area and landscaping (Not numbered).

The potential Aboriginal archaeological impact of these components was assessed in the ACHAR. Additional detail is provided below in **Sections 3.2.1** to **3.2.6**.

3.2.1 Early Learning Centre Extension and Additional Carparking (Item 1)

Early Learning Centre Extension

Seven boreholes were placed in the location of the proposed Early Learning Centre: 1, 2, 3, 101, 102, 103 and 103A (**Table 2**). Sandstone was encountered at depths of between 1.7 and 7.6m below the current ground surface. Sandstone was not encountered in BH103, but was assumed to be present at 11.1m. In general, the units above bedrock have been interpreted as fill rather than natural soil profiles, and in most cases this is supported by the presence of historical artefacts.

Units that may be interpreted as remnants of the natural soil profile were encountered in BH2, BH101, BH103, and BH103A. However, the depth of these units, ranging from 0.5 to 5m, is much greater than the expected soil profile in the Hawkesbury Soil Landscape. This suggests that these

[4] Terry Mahady, pers. comm., 5/5/21.
[5] Coast 2020: 76-77

units may also have been introduced to the location, possibly to fill a gully associated with the former watercourse that passed through or nearby here.

The proposed Early Learning Centre (ELC) Extension is a two-storey building, to be cut into the slope adjacent to the existing ELC / Sophie's Cottage. The works will involve removal of the current timber access ram and shade structures and bulk excavation. The lower floor of the new building will be at 37.2m AHD, with deeper excavation required for piers and construction of the slab. The results of the geotechnical investigation indicate that the bulk excavation will affect material that has been identified as fill.

Additional carparking

It is proposed to construct two additional carparking areas adjacent to existing internal roads, to the west of the ELC Extension. These proposed carparks were not included in the proposed development as described in the ACHAR.

Details of the earthworks required for these carparks are not yet available. The proposed paving materials are permeable pavers which are 80mm in thickness. These are the same as the pavers which will be used for the new internal road from the secondary entry (**Section 3.2.3**). For the internal road, removal of the modern topsoil will be required, to a depth of 150mm. it is assumed that a similar depth of excavation will be required for the carparking. This depth of disturbance is likely to affect only modern topsoils.

Table 2. The results of the geotechnical boreholes in the vicinity of the ELC Extension (Item 1)

No.	Ground surface (m AHD)	Depth from surface (m)	Description
1	35.1	0-0.05	Asphaltic concrete
		0.05-1.7	Fill: light grey silty sand, igneous gravel
			Fill: light brown silty sand, clay & sandstone gravel
		1.7-2	Sandstone
2	38.6	0-0.09	Asphaltic concrete
		0.09-4.2	Fill: brown silty sand, brick fragments, sandstone gravel & clay
		4.2-8.3	Light orange brown silty sand; clay, ironstone gravel
		8.3-9.2	Light orange brown sand; ironstone gravel, clay
3	40.6	0-0.05	Asphaltic cement
		0.05-6.2	Fill: Brown silty sand; clay
			Fill: brown & light brown silty sand
			Fill: brown & dark brown silty sand; igneous gravel, brick fragments
			Fill: brown & dark brown silty sand; igneous gravel, brick fragments
			Fill: brown & dark brown silty sand; sandstone boulders & cobbles
		6.2-9.3	Sandstone
101	40.6	0-0.05	Asphaltic concrete

No.	Ground surface (m AHD)	Depth from surface (m)	Description
		0.05-5.8	Fill: brown silty sand; sandstone, ironstone & igneous gravel
			Fill: brown & light grey silty sand; sandstone & ironstone gravel, brick & glass fragments, ash
		5.8-7.6	Brown sand; silt
		7.6-12.44	Sandstone
102	37	0-2.1	Fill: brown sand; ironstone, sandstone, igneous gravel
			Fill: light grey & orange brown sand (?); sandstone & ironstone gravel
		2.1-3.4	Sandstone
103	38.6	0-0.06	Asphaltic concrete
		0.06-4	Fill: brown silty sand; sandstone gravel, brick, tile & metal fragments, slag, ash
		4-6.9	Fill: brown silty sand, sandstone gravel, clay, ash
		6.9-7.3	Dark brown silty sand; clay
		7.3-11.1	Light grey sandy clay
		11.1-11.5	Inferred bedrock
103A	38.6	0-0.09	Asphaltic concrete
		0.09-4	Fill: brown silty sand; sandstone gravel, brick, tile & metal fragments, slag, concrete, ash, plastic
		4-6.9	Fill: brown silty sand, sandstone gravel, clay, ash
		6.9-7.4	Brown silty sand
		7.4-11.39	Sandstone

3.2.2 Senior School – Main Entry Forecourt, Landscaping and Accessible Entry Ramp (Item 7)

The proposed works in this location comprise:

- Removal of an open brick drain, and sections of garden edging, and the existing concrete slab
- Construction of sandstone paths, including a ramp to the main entry
- Construction of garden beds
- Laying turf across the remaining area

The finished levels will vary, and the depth of excavation required is presently unknown. In addition, no geotechnical investigation has been undertaken in this area. However, the paving surrounding the central garden bed will be at 51.69m AHD. The current ground level in this location varies from 51.47 to 51.59m AHD, which is slightly lower. This suggests that it should be possible to limit excavation for these works to disturbed units, including the current bedding material, and avoid or minimise impact to undisturbed units.

3.2.3 Traffic Management- Proposed Secondary Entry, Pick Up and Drop Off and Elevated Foot Bridge (Item 9)

Boreholes 4 and 5 were drilled to investigate the location of the proposed pedestrian bridge, in the grassed area adjacent to the Grotto (**Table 3**). In BH4, to the south, two units were identified above the sandstone (located at 2.4m): a brown silty sand, and an underlying orange-brown silty sand. In BH5, to the north, one unit was identified; a brown silty sand with sandstone cobble and boulder inclusions, to a depth of 1.7m. In both boreholes, the material was identified as fill.

The description of the matrix is comparable to the expected A Horizon of the soil landscape. However, the depth and the presence of large sandstone inclusions in BH5 support the interpretation as fill, in particular given the historical quarry in this location. This suggests that the subsurface works required for the construction of the pedestrian bridge are only likely to affect already disturbed material.

Boreholes 6 and 7 were drilled to investigate the location of the proposed vehicle entrance off Vaucluse Road and the new internal road (**Table 3**). The top 0.2-0.3m was described as silty sand, and interpreted as fill. Underneath this, to a depth of 1.4-0.5m was a silty sand, with clay inclusions in BH6. The lower unit may represent the lower part of the topsoil, or the subsoil.

The new internal road will be constructed using permeable pavers which are 80mm in thickness. For installation of the pavers, removal of the modern topsoil will be required to a depth of 150mm.[6] It is likely that this material is a modern topsoil. Natural soil horizons may be present lower in the profile, but are not proposed for impact.

Table 3. The results of the geotechnical boreholes in the vicinity of the secondary entry and footbridge (Item 9)

No.	Ground surface (m AHD)	Depth from surface (m)	Description
4	?	0-1.7	Fill: Brown & light brown silty sand; root fibres
		1.7-2.4	Fill: Light orange brown silty sand
		2.4-3.2	Sandstone
5	?	0-1.7	Fill: Brown & dark brown silty sand; sandstone cobbles & boulders, root fibres
		1.7-2.5	Sandstone
6	51.4	0-0.3	Fill: Dark brown silty sand; roots & root fibres
		0.3-0.5	Orange brown silty sand; clay
7	51.8	0-0.2	Fill: Dark brown silty sand; roots & root fibres
		0.2-0.4	Light orange brown silty sand

3.2.4 Traffic Management – Proposed Pick Up and Drop Off with Widening of Exit Road (Item 10)

Boreholes 201 and 202 are located in this area (**Table 4.**). Below the current concrete surface is a unit that has been interpreted as fill, extending to a depth of 1.1-1.2m below the current ground

[6] Terry Mahady, pers.comm., 7/5/21

surface. This is a brown sand with sandstone gravel and silt inclusions. It could possibly be equivalent to the A1 Horizon, although the depth of the unit suggests otherwise. In BH201, closest to the Main Building, the fill unit sat directly over the sandstone bedrock, at a depth of 1.1m. In BH202, closer to the Vaucluse Road boundary, two additional units were observed between the fill and the bedrock; a brown silty sand (possible A Horizon) from 1.2 to 1.5m, and a clayey sand with ironstone gravel and silt (possible B/C Horizon) from 1.5 to 1.6m. if this interpretation is correct, it supports the identification of the upper unit as fill.

It was suggested in the ACHAR that these works were likely to be contained within areas that have already been disturbed (Section 6.2.1). The additional geotechnical information tends to support that assessment.

Table 4. The results of the geotechnical boreholes in the vicinity of the pick-up and drop-off area and exit (Item 10)

No.	Ground surface (m AHD)	Depth from surface (m)	Description
201	51.6	0-0.1	Concrete
		0.1-1.1	Fill: brown sand; sandstone gravel, silt
		1.1-6.06	Sandstone
202	53.2	0-0.12	Concrete
		0.12-1.2	Fill: brown sand; sandstone gravel, silt
		1.2-1.5	Brown silty sand
		1.5-1.6	Light grey and red brown clayey sand; ironstone gravel, silt
		1.6-9.08	Sandstone

3.2.5 Traffic Management - Bus and Car Parking (Item 13)

Boreholes 8, 9, 10 and 203 were placed in the location of the proposed bus and car parking, near the southern boundary of the school property. In these four boreholes, sandstone was encountered at depths ranging from 0.45 to 2.1m from the current ground surface. Most of the overlying units were identified as fill, and the presence of historical inclusions tends to support the interpretation. The exception is a unit of light brown clayey sand identified in BH8, at 1.6-1.8m; this may be remnant subsoil.

The results are consistent with the known history of this location. It is likely that a watercourse formerly passed through this part of the campus, and fill would have been introduced to allow building and creation of the gardens.

The proposed Bus and Car Parking is a two-level structure, with the upper level at the current ground level, and the lower level forming a basement below. The proposed works will involve bulk excavation, to create the basement level. Due to the existing difference in ground level, excavation in the northern section will be much deeper than in the south. The basement floor will be at 48.6m AHD at the northern end, and will slope down to about 48m AHD at the southern end. Excavation will be deeper than the finished floor level, to allow for footings and the slab.

The results of the geotechnical investigation indicate that the bulk excavation will affect material that has been identified as fill, and will extend into the underlying bedrock at least in the north-eastern area. In most locations, the fill units sat directly over the sandstone, but a unit of clayey sand was identified in borehole 8, and may represent a natural soil profile. This sand unit was found below the level proposed for excavation.

Table 5. The results of the geotechnical boreholes in the vicinity of the bus and car parking (Item 13)

No.	Ground surface (m AHD)	Depth from surface (m)	Description
8	48.6	0-0.6	Fill: brown silty sand, traces of roots and root fibres
		0.6-1.6	Fill: grey & light brown silty sand, inclusions comprising ironstone gravel, concrete, slag
		1.6-1.8	Light brown clayey sand
		1.8-2.1	No core
		2.1-5.95	Sandstone
9	50	0-0.9	Fill: brown & dark brown silty sand, sandstone gravel, roots & root fibres
			Fill: light orange brown and brown silty sand, sandstone gravel & clay
		0.9-4.7	Sandstone
10	48.5	0-0.45	Fill: dark brown silty sand, sandstone gravel
		0.45	Top of sandstone
203	49.4	0-0.09	Concrete
		0.09-1.8	Fill: brown sand; igneous, ironstone & sandstone gravel
			Fill: dark brown silty sand; ironstone & sandstone gravel, plastic & glass fragments, slag, organic matter
		1.8-5.91	Sandstone

3.2.6 Junior School: modifications to play area and landscaping (Items 3, 4 and 5)

Plans have been prepared for the proposed landscaping surrounding the Junior School and ELC (**Figure 5**). Exact details of the extent and depth of any earthworks are not available, however the landscaping does not require bulk excavation or modification to the outcropping bedrock.

Figure 5. Overview of the proposed landscaping surrounding the Junior School and ELC

Source: Turf Design Studio, March 2021

4 Summary

In the impact assessment contained in the ACHAR (Section 6.2), one component of the proposed development was assessed as having high potential for impact. This was the Boarding Accommodation Extension (Item 14). Further work on the design of this component, and advice from the project engineers, indicates that the development can be undertaken with no direct impact to the possible site AHIMS #45-6-3754 (KRB Rockshelter) (**Section 3.1**).

In addition, a number of components were assessed as having moderate potential for impact. That is, they were located in an area of moderate archaeological sensitivity, and could involve disturbance

to remnant in situ topsoil or previously outcropping bedrock. The additional information that is now available suggests that the potential for impact to such features is less than was considered possible in the ACHAR. In particular, in the areas proposed for deep excavation (Items 1 and 13), the results of the geotechnical investigation suggest that the works will be contained largely within disturbed material.

The possibility of archaeological test excavation was considered in the ACHAR, in order to test the identified areas of moderate archaeological sensitivity (Section 5.1). However, it was considered unlikely to be useful, because any unidentified sites that may be present are likely to be fairly discrete in extent, and it has not been possible to focus the identified potential on specific locations. The additional information now available does allow additional refinement of the archaeological potential of the study area, but also suggests that the potential for impact as a result of the proposed development is less than was thought at the time the ACHAR was completed.

We therefore suggest that the management strategies proposed in the ACHAR (Section 6.4) are appropriate to the potential for Aboriginal heritage impact that has been identified.

If you require any further information, please do not hesitate to contact us.

Yours sincerely,

Fenella Atkinson
Senior Heritage Consultant
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Appendix 1

AHIMS Register Search

[The searches are of a total area of 10km x 12km covering the study areas. To help protect the listed Aboriginal sites we have provided only the basic search results without site coordinates. If the extensive search results showing site names and coordinates are required, please contact Coast History & Heritage].

AHIMS Web Services (AWS)
Search Result

Purchase Order/Reference : 2019-20

Client Service ID : 572618

Coast History & Heritage

PO BOX A74 7 Mitchell Street
Arncliffe New South Wales 2205

Attention: Fenella Atkinson

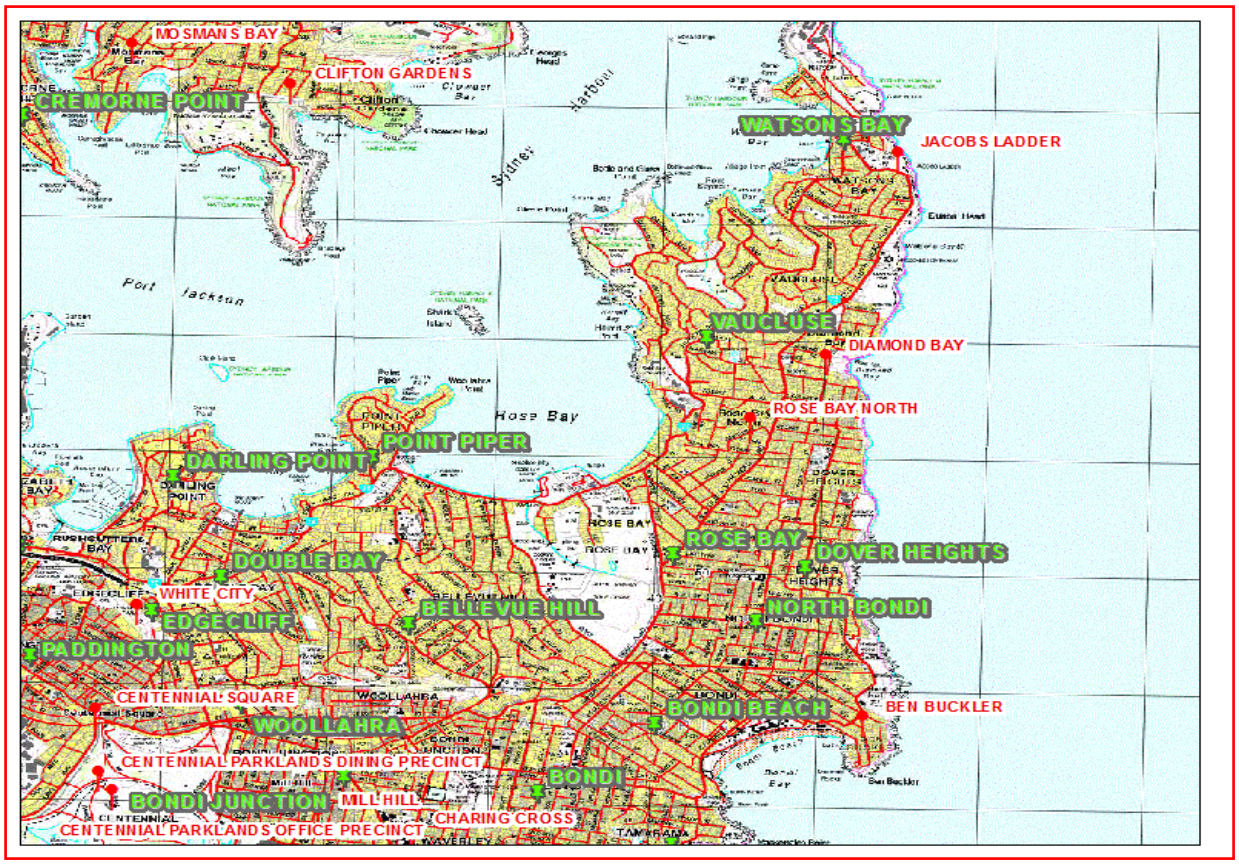
Email: fenella@coasthistory.com.au

Date: 02 March 2021

Dear Sir or Madam:

AHIMS Web Service search for the following area at Datum :GDA, Zone : 56, Eastings : 337700 - 341700, Northings : 6247700 - 6254700 with a Buffer of 0 meters, conducted by Fenella Atkinson on 02 March 2021.

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 the Office of the Environment and Heritage AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

110	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 (http://www.nsw.gov.au/gazette) website. Gazettal notices published prior to 2001 can be obtained from Office of Environment and Heritage's Aboriginal Heritage Information Unit 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 be made available to the public.
- AHIMS records information about Aboriginal sites that have been provided to Office of Environment and Heritage 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.

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