CONSULTANTS

ARCHAEOLOGY - HERITAGE - MEDIATION - ARBITRATION

Sydney Olympic Park High School

Aboriginal Cultural Heritage Assessment Report

27th AUGUST 2021

Report to: School Infrastructure NSW

LGA: City of Parramatta Council

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EXECUTIVE SUMMARY

The Department of Education through School Infrastructure NSW (SINSW) has developed a Master Plan for the development of the Sydney Olympic Park new high school. The proposed development is located within the peninsula of Wentworth Point at 7-11 Burroway Road, Wentworth Park across parts of three lots; Lot 202 DP1216628, Lot 203 DP1216628 and Lot 204 DP1216628.

The school is to be developed in two stages. Proposed elements of the project include:

- A stream 9 school of 1,530 students
- Covered Outdoor Learning Area (COLA)
- Outdoor Learning Unit (attached to general learning areas)
- Outdoor Covered Workshop Unit

Planning Secretary's Environmental Assessment Requirements (SEARs) were issued for the project on 23 December 2020, application number SSD-11802230. Key Issue 7 outlines the requirements for Aboriginal Cultural Heritage. This report has been prepared to address Key Issue 7 'Aboriginal Cultural Heritage' of the SEARs.

Comber Consultants have been engaged to undertake Aboriginal consultation in respect of the project and to prepare this Aboriginal Cultural Heritage Assessment Report (ACHAR). The consultation and this report have been undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* and to satisfy the Aboriginal Cultural Heritage requirement of the SEARs.

The Registered Aboriginal Parties (RAPs) are as follows:

- Lilly Carroll & Paul Boyd, Didge Ngunawal Clan
- Basil Smith, Goobah Developments
- Kaarina Slater, Ngambaa Cultural Connections
- Danny Franks, Tocomwall
- Wendy Smith, Gulaga
- Phil Khan, Kamilaroi Yankuntjatjara Working Group
- Carolyn Hickey, A1 Indigenous Services
- Jamie Eastwood, Aragung Aboriginal Cultural Heritage Site Assessments
- Justine Coplin, Darug Custodian Aboriginal Corporation
- Arika Jalomaki, Yulay Cultural
- Rodney Gunther, Waawaar Awaa Aboriginal Corporation
- Ryan Johnson, Murra Bidgee Mullangari Aboriginal Corporation
- Shaun Carroll, Merrigarn
- Roxanne Smith, Murramarang
- Daniel Chalker, Wori Wooilywa
- Joel Tubbs & Corina Normann, Dharug Ngurra
- Nathan Moran, Metropolitan Local Aboriginal Land Council
- Phil Boney, Wailwan Aboriginal Group
- Name withheld
- Name withheld
- Name withheld

Background research undertaken for the Aboriginal Archaeological Assessment (Comber 2021) has determined that the study area is located entirely within land that was reclaimed by 1943. Prior to this, the area consisted of tidal mudflats that would have been regularly submerged under water. A site inspection confirmed that no natural soil deposits exist within the study area. Further, the study area is subject to tidal flooding. As such, Aboriginal archaeological potential within the study area has been assessed as nil.



This ACHAR makes the following recommendations:

- 1. Aboriginal community consultation in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* should continue for the remainder of the project, including input into the design principles of the new high school.
- 2. As the study area is on reclaimed land and does not contain Aboriginal archaeological potential, no further Aboriginal archaeological assessment or testing is required.



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1.0 INTRODUCTION

1.1. Background

The Department of Education through School Infrastructure NSW (SINSW) has developed a Master Plan for the development of the Sydney Olympic Park High School (SOP High School). The site is located at Burroway Road, Wentworth Point NSW, 2127 and comprises part Lot 202 DP 1216628 and part Lot 203 DP 1216628.

Proposed elements of the project include:

- A stream 9 school of 1,530 students
- Covered Outdoor Learning Area (COLA)
- Outdoor Learning Unit (attached to general learning areas)
- Outdoor Covered Workshop Unit

Planning Secretary's Environmental Assessment Requirements (SEARs) were issued for the project on 23 December 2020, application number SSD-11802230. Key Issue 7 outlines the requirements for Aboriginal Cultural Heritage.

Comber Consultants have been engaged to undertake Aboriginal consultation in respect of the project and to prepare this Aboriginal Cultural Heritage Assessment Report. The consultation and this report have been undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* and to satisfy the Aboriginal Cultural Heritage SEARs.

1.2. Site description

The proposed development is located within the peninsula of Wentworth Point at 7-11 Burroway Road, Wentworth Park across parts of three lots; Lot 202 DP1216628, Lot 203 DP1216628 and Lot 204 DP1216628. The site forms part of the Wentworth Point Planned Precinct, which was rezoned in 2014 for the purposes of high density residential, public recreation, school and business purposes.

The site is approximately 9,511sqm in area, with a frontage of approximately 91m to Burroway Road. It currently contains vacant land, which is cleared of all past development, and almost entirely cleared of native vegetation.

The surrounding area is generally characterised by high rise residential and mixed-use developments. The site is directly adjacent to the Wentworth Point Peninsula Park and immediately east of Wentworth Point Public School.





Figure 1: Site aerial map (Source: Mecone)

1.3. Statutory controls

National Parks & Wildlife Act 1974

The *National Parks & Wildlife Act 1974* (NPW Act) protects all Aboriginal objects and Places in New South Wales. The NPW Act is administered by Heritage NSW. An Aboriginal object and Place are defined as:

Aboriginal Object

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 An Aboriginal Place means any place declared to be an Aboriginal Place under section 84. Section 84 states:

The Minister may, by order published in the Gazette, declare any place specified or described in the order, being a place that, in the opinion of the Minister, is or was of special significance with respect to Aboriginal culture, to be an Aboriginal place for the purposes of this Act.

Under Section 90 of the NPW Act it is an offence to harm an Aboriginal object without an Aboriginal Heritage Impact Permit (AHIP). However, as this site does not contain Aboriginal objects and as this project will be assessed as a State Significant Development (see below) an AHIP will not be required.



Environmental Planning & Assessment Act 1979

It is understood that this project will be undertaken as a State Significant Development (SSD). Under Part 4, Division 4.1 of the Environmental Planning & Assessment Act 1979 (EPA Act) an Aboriginal Heritage Impact Permit is not required for an SSD. The EPA Act is administered by the Department of Planning, Industry and Environment who will provide the consent for this project and for any impact on Aboriginal objects.

However, it is generally a standard requirement of the SEARS that Aboriginal consultation in accordance with the Aboriginal Cultural Heritage Consultation Guidelines for Proponents 2010 be undertaken, whether or not Aboriginal objects are known to exist on the property.

Part 6 of the Act states that it is an offence to harm or desecrate an Aboriginal object or Aboriginal place, without an Aboriginal Heritage Impact Permit (AHIP).

Planning Secretary's Environmental Assessment Requirements

Planning Secretary's Environmental Assessment Requirements (SEARs) were issued for the project on 2 December 2020, application number SSD-11070211. Key Issue 8 relates to Aboriginal Cultural Heritage and is included below.

7. Aboriginal Cultural Heritage

- Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) that:
 - o identifies and describes the Aboriginal cultural heritage values that exist across the site.
 - \circ includes surface surveys and test excavations where necessary.
 - has been prepared in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH, 2010).
 - incorporates consultation with Aboriginal people in accordance with Aboriginal Cultural Heritage Consultation Requirements for Proponents (Department of Environment, Climate Change and Water, 2010).
 - documents the significance of cultural heritage values of Aboriginal people who have a cultural association with the land.
 - o identifies, assesses and documents all impacts on the Aboriginal cultural heritage values.
 - demonstrates attempts to avoid all impacts on the Aboriginal cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the ACHAR and EIS must outline measures proposed to mitigate impacts.
 - demonstrates attempts to interpret the Aboriginal cultural heritage significance identified into the development.
 - Any Aboriginal objects recorded as part of the Aboriginal Cultural Heritage Assessment Report must be documented and notified to the Aboriginal Heritage Information Management System (AHIMS) within Heritage NSW of the Department of Premier and Cabinet.

1.4. Objectives of the Aboriginal Cultural Heritage Assessment Report (ACHAR)

This ACHAR details the results of the assessment and recommendations for actions to be taken before, during and after the proposed activities associated with the project in order to manage and protect Aboriginal objects identified by the investigation, assessment and testing of the study area.



2.0 ABORIGINAL HISTORY

2.1. Introduction

A brief summary of the Aboriginal history of the study area is included in this chapter. The history of Aboriginal connections to the Sydney Olympic Park area has been the subject of extensive research as part of the Sydney Olympic Park Aboriginal History & Connections Program undertaken by Dr Paul Irish, historian and archaeologist, between 2002 - 2005. This research has been summarised in the report *Aboriginal People at Homebush Bay: From the Wann-gal to the Present Day* (Irish 2005). Dr Irish's report should be referred to for further information on the history of the region.

2.2. Wann

Wentworth Point is situated in an area of land called the Wann. The men of the Wann were referred to as Wann-gal and the women as Wann-galleon. The Wann extended along the southern shore of the Parramatta River, between the Gadiland of Cockle Bay/Darling Harbour and the Burramatta land (Rose Hill) (Irish 2006:26, Irish 2005). Due to these close connections, the Wann would have routinely interacted with their neighbours and, thus, they were likely bi-lingual speaking their own dialect as well as those from the adjacent communities (Irish 2006:26, Irish 2005).



Figure 2: The general location of the Wann (Attenbrow, 2010:23)

The length of the occupation of the Wann is unknown and no dating records in the immediate area are currently available. However, dating of occupation in the Sydney Basin as a whole confirms an Aboriginal presence of thousands of years. A site in North Parramatta has been dated to more than 7,500 years BP (Comber Consultants 2019:40; 2018:59). Another site has been shown to have been occupied repeatedly in the terminal Pleistocene, through to the Holocene from about 10,000 years BP (Comber Consultants 2018b:9). The earliest date recorded in the Sydney Basin is 30,000 years BP (McDonald 2006:4).

2.3. Food and subsistence

Almost no specific information is available about the traditional use of the tidal mudflats by the people of the Wann. Typically, estuarine ecosystems provided the Aboriginal communities with resources for food and tool manufacture as well as a means of travelling throughout the region by water. The area opposite Homebush Bay was a traditional fishing location for the Wann and their neighbouring communities but there is little other information available on the Aboriginal camping places. Given these circumstances, Irish (2006:27) concluded that the Wann lived similarly to their neighbours of the Sydney area.



Aboriginal people continued their traditional use of the Homebush Bay area after their lands were granted to Europeans. Several encounters and conflicts between Europeans and Aboriginal people are documented for the Homebush Bay area throughout the 1790s. In the early 1800s Aboriginal people were working for and supplying fish to the Blaxlands on their Newington Property. In November 1788 in particular, the establishment of Rose Hill meant that there was a permanent European presence nearby the Wann land and that contact between the two parties was likely to have occurred.

Walker (1928:84) refers to fishing in the Parramatta River near to what became the Newington Armoury Precinct and the access provided by regular exposure of the mud flats allows inferences to be made on the harvesting of shellfish and crustaceans. When covered by tidal waters, the area is also likely to have been used for fishing from bark canoes.

2.4. European occupation

The major impact on Aboriginal occupation in the study area began with colonisation in 1788, quickly expanding along Parramatta River, past the study area, and on to Parramatta. Aboriginal use of the area for fishing and extraction of resources from the mud flats were rapidly curtailed by introduced regulations and through introduced diseases. As the Europeans began to expand across Sydney, conflicts with Aboriginal people occurred. In order to prevent these conflicts, Governor Phillip in 1791, encouraged the trade of fish and other wares between Aboriginal people, the convicts and marines at Parramatta (Irish 2006:27). This plan, however, did not last long as within weeks convicts destroyed the canoe of a young Wallumetta man, Balloderry, who had been fishing along the river and bringing his catch into town (Irish 2006:27).

Irish (2006:28) suggests also that Aboriginal people were still cutting bark from trees at Homebush Bay in the 1810s and it is likely that they were still fishing in the river and gathering food in these areas. Aboriginal groups in the region were able to continue using their languages, and from the 1790s a dialect developed among the Aboriginal communities of the area which was a mixture of an Aboriginal dialect and English (Irish 2006: 27-28). By the 1830s, however, it appears that there was a very limited number of Aboriginal people left living along the river, but many traditional beliefs and language were maintained through elders of the clan (Irish 2006: 28). After 1850 information on Aboriginal people in the area becomes increasingly scarce with only scattered references to Aboriginal people around the Parramatta River (Irish 2006:29).

2.5. The Aboriginal Community of Wentworth Point in the Twenty-first Century

The 2016 census recorded 36 Aboriginal and Torres Strait Islander people as living in Wentworth Point in the City of Parramatta LGA (2016 Census Stats). In the 2016 census, there were 186,320 people in Paramatta, of these, Aboriginal and/or Torres Strait Islander people made up 0.7% of the population (2016 Census Quickstats).

Although the Aboriginal population of Wentworth Point is small, the City of Parramatta LGA of which it is part continues to be an important meeting place for Aboriginal people.

It is clear that the lives of people who had lived according to traditional ways, including the people of the Wann, were catastrophically altered by European occupation from the late eighteenth century. Through perseverance and showing great resilience Aboriginal Australians retain and practise core traditions, language, customs and beliefs, passing them on to future generations despite the significant impact on their lives, livelihoods, culture and Country.



3.0 ENVIRONMENTAL CONTEXT

The study area is located on the southern bank of the Parramatta River within the Cumberland Plain, across an area of reclaimed land. This portion of Wentworth Point consists of a flat terrain that is subject to flooding. The *Wentworth Point Development Control Plan* (2014) identifies that the study area is contaminated as a result of historic land reclamation. This is confirmed by the overlay on a current aerial image by a 1789 survey map by William Bradley, which shows the study area located within a mudflat (Figure 3).

Land reclamation was undertaken using contaminated fill from the nearby petroleum storage infrastructure (Wentworth Point DCP 2014:15). The approximate extent of the landfill relating to the study area and surrounds is shown in Figure 4. The land reclamation was completed by 1943, as shown in Figure 5.

As the study area consists entirely of land fill, no *in situ* soil deposits, water courses or geological formations are located across the site.



Figure 3: Study area (edged in red) and current aerial map overlaid with a 1789 map of 'Flats at the head of Port Jackson & channel up to Rose Hill' by-W Bradley (Source: SLNSW)





Figure 4: Reclamation of the study area and surrounds highlighted in brown. Study area edged in red (extrapolated from Casey & Lowe 2009:45)



Figure 5: 1943 aerial image of Wentworth point showing the study area as existing landfill, approximate study area location shown edged in red (source: www.sixmaps.com)



Currently, the study area is vacant with cement slabs located across the site from a former industrial use, as shown in Figure 6 below. A large mound, sparse trees and vegetation regrowth as well as introduced gravels are located within the study area. It is understood the mound was constructed to stop floodwaters.



Figure 6: 2009 aerial image of study area shows concrete covering majority of study area, and land being used for industrial purposes (Google Earth)



4.0 ARCHAEOLOGICAL CONTEXT

4.1. Sydney Basin

Many surveys have been undertaken in the Sydney region which indicate the richness of the archaeological resources and provide information about Aboriginal occupation. In particular, Attenbrow (2002) has excavated a range of sites within the Sydney Basin. The aim of her study was to identify local geographic variation and temporal changes in the subsistence patterns and material culture of the people of this area. She excavated sites at Balmoral Beach, Cammeray, Castle Cove, Sugarloaf Point (Lane Cove River), Darling Mills State Forest, Winston Hills, Vaucluse and Cumberland Street in the Rocks. Dates for initial occupation vary from approximately 10,000 years BP at Darling Mills to approximately 450 years BP at Cumberland Street, The Rocks.

The oldest dated occupation for the Sydney region is 30,000 years BP from a site excavated by McDonald at Parramatta. McDonald excavated an area known as the RTA site, located at George Street, Parramatta (McDonald 2005), on an alluvial sand terrace running parallel to the Parramatta River. This site provided a sequence of occupation dating from the late Pleistocene through to the mid-Holocene. Although the site had been heavily impacted by development, the sub-surface deposits revealed an "accumulation of evidence from multiple occupation episodes, no doubt occurring at many different times" (McDonald 2005:147). Radiocarbon dating provided a range of dates indicating continuous occupation of the site. The most important date showed that the alluvial sand terrace was possibly first occupied during the late Pleistocene period, about 30,000 years BP and then showed various phases of occupation (McDonald 2005:107). The earliest date obtained from this site, 30,000 years BP, provides the oldest date for the Sydney Basin (McDonald 2005:4). However, it should be noted that the date was obtained from charcoal in the sieve and not in association with cultural deposits, therefore caution should be exercised when considering this date. The next oldest dated occupation is 15,000 years BP from the Shaws Creek K2 rock shelter on the Nepean River (Kohen 1984; Nanson et al 1987). However, these dates must be considered in association with environmental data related to sea level rises. The Sydney region that we know today was vastly different to the landscape of 15,000-30,000 years ago (Nutley 2006).

The period of maximum glaciation was 15,000–18,000 years BP. Therefore, the date of the K2 rock shelter, Attenbrow's Darling Mills site and McDonald's Pleistocene date, indicate that Aboriginal people lived throughout a period of extreme environmental change. During this period, sea levels were up to 130m below current levels (Nutley 2006:1). About 10,000 years ago as temperatures began rising at the end of the last ice age, the polar ice started melting and sea levels rose. The rising sea levels forced people to abandon coastal sites and move inland, with the result that the oldest coastal sites were inundated. By about 6,000 years ago rising water levels had flooded the coastal plain forming the Sydney landscape that we know today. The vast majority of sites in the Sydney region date to around 5,000 years BP, after sea levels had stabilised. Whilst research into submerged indigenous sites is now being undertaken (Nutley 2006), there are few sites in the Sydney area that are known to date beyond 10,000 years BP. Therefore, research undertaken to date has focused on subsistence patterns and cultural change, e.g. Attenbrow (2003).

Attenbrow's (2002) study of the "Sydney region" extended from the eastern coast to the Hawkesbury-Nepean River to the north and west and as far south as Picton (2002:xiii), which includes the present study area. At the time of publication (2002), Attenbrow noted that approximately 4,340 Aboriginal sites had been registered with OEH's Aboriginal Heritage Information Management System (AHIMS) in the Sydney region (Attenbrow 2002:48). Middens and open campsites comprised just over half of the recorded sites (Attenbrow 2002:48-49). From both the archaeological evidence and historical records, she noted that the main focus of occupation was "on the valley bottoms and shorelines" (Attenbrow 2002:47). In addition, the evidence indicates that occupation was greater on the coastal/estuarine environments rather than in the hinterland/freshwater environments and on the Hawkesbury sandstone areas rather than the Wianamatta shales (Attenbrow 2002:51). Her work produced a great deal of information in respect of the people of the Sydney region, their social organisation and land use patterns. Her (2002:152-155) analysis indicates that prior to 5,000 years ago occupation in the Sydney region was not intensive and was only occupied by small groups of people. It was not until sea levels stabilised about 5,000 years ago that more intensive occupation began with many open sites being first occupied in the last 1,500 years.

On the Cumberland Plain, which falls within Attenbrow's Sydney Region, many surveys have been undertaken in relation to Environmental Impact Statements. As a result of these studies, which were occasioned by the burgeoning urban expansion extending into the Cumberland Plain, the NPWS recognised the need for a coherent study of the area to fully assess the impact of urbanisation on the natural and cultural heritage of the Cumberland Plain. Smith (1989a) was commissioned by the NPWS to undertake an Aboriginal Site Planning Study to be utilised in the management of Aboriginal sites on the Cumberland Plain. Prior to her study, 307 sites had been recorded on the Cumberland Plain, mainly open



artefact scatters (297) with four scarred trees, one carved tree, four axe-grinding grooves and a Mission site (the Blacktown Institute). Smith (1989a:2) added 79 open sites and 29 isolated finds from field surveys related to her study.

Smith's (1989a:3) analysis indicated that site location and site densities were influenced by the availability of water and raw materials. She concluded that other factors such as topography, natural vegetation and soil types did not influence site location. She also identified that the majority of sites recorded have been in the northern sector of the Cumberland Plain, during site surveys of areas threatened by development (Smith 1989a:21). Her field studies (1989a & 1989b:10) confirmed that site densities in the southern Cumberland Plain appear to be lower overall to site densities on the northern Plain.

Since Smith's study, there has been a dramatic increase in development in Western Sydney, resulting in a great deal more archaeological survey and excavation (Comber 1990, 1991, 2006a; McDonald 1989, 2002 & 2005a). This further work has indicated the complexity in the archaeological record of the area that was not previously recognised. For example, sites on permanent water are more complex than sites on ephemeral drainage lines with major confluences being prime site locations. However, McDonald (2005a) reports that archaeological sites are found in a range of landscapes and that their condition is dependent on the amount of impact from European land practices.

McDonald's (2005a) report demonstrates the dynamic nature of stone tool technologies on the Cumberland Plain. She reviewed previous work within a theoretical framework to identify intra and inter-regional variation. She not only identified change over time in the stone tool technology, but the manner in which "stone technologies were organised in relation to landscape" (McDonald 2005a:np). Her report provides a framework to tentatively date sites through technological analysis and to identify cultural changes.

Her study also indicated that the surface representation of a site on the Cumberland Plain does not necessarily reflect the actuality of that site. Of the excavations conducted by her, sub-surface deposits were present even when there was no surface indication of a site. According to McDonald (2005a:5), "despite artefacts being rare or completely absent on the surface at each of the sites investigated, all six sites were found to contain intact archaeological deposit. Almost 500 square metres were excavated during this Project and almost 35,000 artefacts retrieved."

Excavations by Comber (2010) at Penrith confirmed that it was possible for subsurface deposits to exist without any surface artefacts being recorded. She excavated a total of 63 trenches yielding over 2,500 artefacts, in areas where artefacts were not present on the surface (Comber 2010:1).

Comber's excavations at Parramatta (2018 & 2019a&b) and Comber & Stening (2018, 2019 a&b) have confirmed McDonald's hypothesis and that subsurface artefact deposits can be found despite disturbance from ongoing residential and commercial construction.

4.2. Wentworth Point

To date, archaeological investigations within the immediate vicinity of the study area have been limited. This is likely due to the study area being located within reclaimed land and the lack of archaeological potential. Archaeological investigations have been undertaken within areas of natural landscapes in the Homebush and Sydney Olympic Park region, with registered Aboriginal sites located in the wider region.

A search was undertaken of the Aboriginal Heritage Management System (AHIMS) on 03/03/2021. The search revealed 24 registered Aboriginal sites within a 3km radius of the study area. The results of the AHIMS search are detailed in Table 1 below.



Site Type	Frequency	Percent
Shell, Artefact	7	29.18
Potential Archaeological Deposit (PAD)	6	25
Artefact	5	20.84
Art (Pigment or Engraved)	2	8.34
Grinding Groove	1	4.16
Shell	1	4.16
Modified Tree (Carved or Scarred)	1	4.16
Restricted	1	4.16
TOTAL	24	100%

Table 1: Summary of AHIMS sites in a 3km radius from the study area

Shell and artefact sites and Potential Archaeological Deposits (PADs) are the most represented site type, at 54.18% of the total number of sites. Artefact sites, art sites, a grinding groove, a shell site and a modified tree make up the remainder of the site types. One site, 45-6-3022, is listed as a restricted site. AHIMS was contacted and was able to confirm that this site is not located within or adjacent to the current study area.

Figure 7 below shows the distribution of AHIMS sites around the study area. Note that there are no known sites within the area of land reclamation. Figure 8 shows these sites in relationship to the riverbank in 1789. The sites recorded within subsequent fill, and 1.5km of the study area, are on the northern shore Parramatta River and are either on land (45-6-1961) or at the water's edge (45-6-0534, 45-6-3050). As the study area is located on reclaimed land containing contaminated fill, the potential for any unrecorded Aboriginal sites to be present within the study area is nil.



Figure 7: AHIMS sites in proximity to the study area





Figure 8: AHIMS sites in proximity to the study area and relationship to 1789 waterline

4.3. Study Area

There are no registered Aboriginal sites within the study area and the study area is not an Aboriginal place.

4.4. Site prediction

Prior to reclamation, the study area consisted of extensive mudflats and was subject to regular tidal movements, scouring, and redeposition of silt carried downstream during flooding events. The mudflats would not have been an ideal camping location. Occupation sites, such as camp sites or rock shelters, or other evidence of occupation in the form of scarred trees, would not have been present. The Aboriginal archaeological potential of the study area is therefore nil.



5.0 RESULTS, IMPACTS & MITIGATION

5.1. Aboriginal archaeological assessment

The study area was inspected on 19 January 2021 by Dr Jillian Comber, Veronica Norman, Agata Calabrese, Kadibulla Khan and Chris Jones. The whole of the study area was inspected on foot and covered all exposed areas.

The study area is located at the north eastern end of Wentworth Point, immediately east of Wentworth Point Public School. The site is currently vacant, containing mostly cleared land. A large mound runs through approximately half of the study area. It is understood that this mound was constructed to assist with controlling flooding water (pers com General Assistant Wentworth Point Public School to Chris Jones, Comber Consultants). The remainder of the study area consists of sparse vegetation regrowth, gravel, cement slabs and deteriorating infrastructure including former gates and walls.

No *in situ* soil profiles were identified during the site visit. As the study area is located within an area of reclaimed land there is nil potential for Aboriginal sites or places to be located within the study area. For this reason survey units were not recorded during the inspection.



Photograph 1: View from mound to southern boundary of study area – mound was constructed to reduce flooding to adjacent Wentworth Point Public School



Photograph 2: View north east from mound, showing surrounding landscape



Photograph 3: View north from mound, showing surrounding landscape



Photograph 4: Central portion of study area – concrete, asphalt and introduced gravels





Photograph 5: Central portion of study area – concrete, asphalt and introduced gravels



Photograph 6: Southern boundary of study area – concrete, asphalt, introduced gravels and former entrance gate

5.2. Impacts & Mitigation

As the study area is reclaimed land without the potential to contain Aboriginal objects or places, there will be no impacts to Aboriginal sites and therefore specific mitigation measures are not required. Aboriginal community consultation undertaken for the project has not identified any known Aboriginal sites or areas of significance related to the study area.



6.0 CONSULTATION

Table 2 below summarises the consultation undertaken in accordance with *Aboriginal cultural heritage consultation requirements for proponents 2010.* The letters and emails are attached at Appendix A.

Step	Task Requirement	Action	Date of action	Outcome
4.1.1	Identify if native title exists in relation to the project area.	A search of the National Native Title Register was undertaken	An updated search was undertaken on 5/03/2021	No claims, registrations or ILUAs exist over the study area
4.1.2	Ascertain, from reasonable sources of information, the names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places. Compile a list of Aboriginal people who may have an interest for the proposed project area and hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places	We wrote to the following organisations seeking the names of any Aboriginal people or organisations who may hold cultural knowledge: Metropolitan Local Aboriginal Land Council City Paramatta Council Greater Sydney Local Land Services (GSLLS) Heritage NSW Office of Registrar, Aboriginal Land Rights Act 1983 NTS Corporation	18/12/2020	We received responses from the following: • Heritage NSW forwarded a list of people who may hold cultural knowledge
4.1.3	Written notification and advertisement: Write to the Aboriginal people whose names were obtained in step 4.1.2 and the relevant LALC(s) to notify them of the proposed project. Place a notice in the local newspaper circulating in the general location of the proposed project, explaining the project and its exact location. Notification by letter and newspaper must include: (a) the name and contact details of the proponent (b) a brief overview of the proposed project that may be the subject of an application for an AHIP, including the location of the proposed project (c) a statement that the purpose of community consultation with Aboriginal people is to assist the proposed	 We wrote to the following organisations/people identified in 4.1.2 Metropolitan Local Aboriginal Land Council Deerubbin Local Aboriginal Land Council Yulay Cultural Services Barraby Cultural Services Yurandaali Cultural Services Parramatta City Council Aboriginal Advisory Committee Darug Custodian Aboriginal Corporation Darug Tribal Aboriginal Corporation Darug Land Observations Darug Aboriginal Landcare A1 Indigenous Services Gunjeewong Cultural Heritage Aboriginal Corporation Corroboree Aboriginal Corporation Murra Bidgee Mullangari Aboriginal Corporation Muragadi Heritage Indigenous Corporation Kamilaroi Yankuntjatjara Working Group Wurrumay Pty Ltd Warragil Cultural Services Tocomwall Amanda Hickey Cultural Services 	Email sent 08/01/2021 with response date of 05/02/2021	 We received responses from the following: Lilly Carroll & Paul Boyd, Didge Ngunawal Clan Basil Smith, Goobah Developments Kaarina Slater, Ngambaa Cultural Connections Danny Franks, Tocomwall Wendy Smith, Gulaga Phil Khan, Kamilaroi Yankuntjatjara Working Group Carolyn Hickey, A1 Indigenous Services Jamie Eastwood, Aragung Aboriginal Cultural Heritage Site Assessments Justine Coplin, Darug Custodian Aboriginal Corporation Arika Jalomaki, Yulay Cultural Rodney Gunther, Waawaar Awaa Aboriginal Corporation Ryan Johnson, Murra Bidgee Mullangari Aboriginal Corporation Shaun Carroll, Merrigarn



Step	Task Requirement	Action	Date of action	Outcome
	applicant in the preparation of an application for an AHIP and to assist the Director- General of OEH in his or her consideration and determination of the application (d) an invitation for Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project to register an interest in a process of community consultation with the proposed applicant regarding the proposed activity (e) a closing date for the registration of interests	 Widescope Indigenous Group Ohinawan Culture & Heritage Pty Ltd HSB Consultants Rane Consulting Gunyuu Walbunja Badu Goobah Developments Yerramurra Nundagurri Jerrigong Pemulwuy CHTS Bilinga Munyunga Wingikara Walgalu Thauaira Dharug Gulaga Biamanga Callendulla Murramarang DJMD Consultancy Butucarbin Aboriginal Corporation Didge Ngunawal Clan Ginninderra Aboriginal Corporation Wailwan Aboriginal Group Thoorga Nura Darug Boorooberongal Elders Aboriginal Corporation Ngambaa Cultural Connections Goodradigbee Cultural & Heritage Aboriginal Corporation Mura indigenous corporation Aragung Aboriginal Cultural Heritage Site Assessment Waawaar Awaa Aboriginal Corporation Clive Freeman Galamaay Cultural Consultants (GCC) Wori Wooilywa 	Letter sent 12/01/2021 with response date of 05/02/2021	 Roxanne Smith, Murramarang Daniel Chalker, Wori Wooilywa Joel Tubbs & Corina Normann, Dharug Ngurra Nathan Moran, Metropolitan Local Aboriginal Land Council Phil Boney, Wailwan Aboriginal Group Name withheld Name withheld Name withheld Name withheld
4.1.4	A minimum of 14 days from the date the letter was sent or notice published in the newspaper to register an interest.	Closing date for registration of interest included in the notification letters and notice in the newspaper was at least 14 days from the date the letters were sent and notices appeared in the newspapers.		Closing date for registration of interest on 5/02/2021 for written notification and 22/01/2021 for advertisement.



Step	Task Requirement	Action	Date of action	Outcome
4.1.5	Must advise Aboriginal people who are registering an interest that their details will be forwarded to DPC and the LALC unless they specify that they do not want their details released.	RAP's informed by email dated 08/01/2021 and by advertisement.		One organisation advised they do not want their details (including email address) to other RAP's. Two organisations advised they do not want their details and any details of their correspondence forwarded to LALC.
4.1.6	Make a record of the names of each Aboriginal person who registered an interest. Provide a copy of that record and copy of the notification from step 4.1.3 to the relevant Heritage NSW and LALC within 28 days of closing date for registration of interest.	List of RAP's compiled.	Email sent to Heritage NSW and LALC on 09/02/2021	Requirement met.
4.1.7	LALCs holding cultural knowledge relevant to determining the significance of Aboriginal objects and places in the proposed project area who wish to register an interest to be involved in consultation must register their interest as an Aboriginal organisation rather than individuals.	Metropolitan Local Aboriginal Land Council is a registered party to be involved in consultation (refer to 4.1.6)		MLALC is a RAP
4.1.8	Where an Aboriginal organisation representing Aboriginal people, who hold cultural knowledge has registered an interest, a contact person for that organisation must be nominated. Aboriginal cultural knowledge holders who have registered an interest may indicate they have appointed a representative to act on their behalf. Where this occurs, the registered Aboriginal party must provide written confirmation and contact details of those individuals to act on their behalf.			See above
4.2	Presentation of information about the proposed project.	All RAPs were invited to a consultation meeting to explain project, ascertain significance, and discuss proposed methodology. No RAPs attended the meeting.	12/02/2021	No RAPs attended the consultation meeting.
4.3.1- 4.3.2	Notification of proposed assessment methodology	Methodology was sent to all RAPs for a 28 day review period.	8/02/2021	The methodology was sent on 08/02/2021. Everyone was given 28 days to respond.



Step	Task Requirement	Action	Date of action	Outcome
				One response was received from Ngambaa Cultural Connections on 23/02/2021 agreeing with the methodology.
4.3.3	Gathering information about cultural significance		8/02/2021	This information was requested as part of Step 4.3.1 and is included in the significance assessment.
4.4	Review of draft cultural heritage assessment report	ACHAR sent to RAPs for 28 day review period.	10/03/2021	 Review period closed on 9 April 2021. The following responses were received: Gulaga supports the ACHAR Waawaaar Awaa Aboriginal Corporation supports the ACHAR Kamilaroi-Yankuntjatjara Working Group support the ACHAR, and request that Aboriginal cultural interpretation be included in the development, including native garden beds, art work or displays. Veronica Norman (Comber Consultants) discussed with Kadibulla Khan on the phone that the continuation of Aboriginal community consultation for the remainder of the project, including in regards to the design principles of the school, is included as a recommendation of this report. Ngambaa Cultural Connections supports the ACHAR.

As a result of the above consultation the following organisations are Registered Aboriginal Parties:

- Lilly Carroll & Paul Boyd, Didge Ngunawal Clan
- Basil Smith, Goobah Developments
- Kaarina Slater, Ngambaa Cultural Connections
- Danny Franks, Tocomwall
- Wendy Smith, Gulaga
- Phil Khan, Kamilaroi Yankuntjatjara Working Group
- Carolyn Hickey, A1 Indigenous Services
- Jamie Eastwood, Aragung Aboriginal Cultural Heritage Site Assessments
- Justine Coplin, Darug Custodian Aboriginal Corporation
- Arika Jalomaki, Yulay Cultural
- Rodney Gunther, Waawaar Awaa Aboriginal Corporation
- Ryan Johnson, Murra Bidgee Mullangari Aboriginal Corporation
- Shaun Carroll, Merrigarn
- Roxanne Smith, Murramarang



- Daniel Chalker, Wori Wooilywa
- Joel Tubbs & Corina Normann, Dharug Ngurra
- Nathan Moran, Metropolitan Local Aboriginal Land Council
- Phil Boney, Wailwan Aboriginal Group
- Name withheld
- Name withheld
- Name withheld

No confidential, culturally sensitive or restricted information was identified.



7.0 CULTURAL HERITAGE VALUES AND STATEMENT OF SIGNIFICANCE

7.1. Preamble

Significance assessment is the process whereby sites or landscapes are assessed to determine their value or importance to the community.

A range of criteria have been developed for assessing the significance which embody the values contained in the Burra Charter. The Burra Charter provides principles and guidelines for the conservation and management of cultural heritage places within Australia.

Following are the criteria which will be used to assess the study area.

7.2. Criteria

Social Value (sometimes termed "Aboriginal" value) which refers to the spiritual, traditional, historical or contemporary associations and attachments which the place or area has for the present-day Aboriginal community.

Historic Value refers to the associations of a place with a person, event, phase or activity of importance to the history of an Aboriginal community.

Scientific Value refers to the importance of a landscape, area, place or object because of its archaeological and/or other technical aspects.

Aesthetic Value refers to the sensory, scenic, architectural and creative aspects of the place.

Representativeness refers to whether the site demonstrates the principal characteristics of that site and is a good representative example of that site type.

Rarity refers to the degree to which such a site is known elsewhere and whether the site is uncommon, rare or endangered.

7.3. Assessment

Social Values

The study area sits within the boundaries of the Wann, and the broader Aboriginal landscape of the Sydney Basin. However, as the study area consists entirely of reclaimed land, consultation with representatives of the Aboriginal community has not identified social values related to the site. Evidence of Aboriginal occupation is not predicted to be present on site.

Historic Values

It is unlikely that the mudflats of the area would have been occupied by Aboriginal people prior to land reclamation as they would have been submerged below water.

Scientific Values

The study area does not have the potential to yield further information through detailed scientific and archaeological research as the mudflats are unlikely to have been occupied by Aboriginal people, and due to the land reclamation undertaken in the 1930s. The study area does not have the potential to contain sub-surface archaeological deposits.

Aesthetic Values

The study area does not contain aesthetic values.

Representative Values

The study area does not contain representative values.



Rarity Values

The study area does not contain rarity values.

7.4. Statement of significance

The study area sits within the boundaries of the Wann, and the broader Aboriginal landscape of the Sydney Basin. However, the land on which the study area is located was reclaimed in the 1930s. Prior to this, the study area would have consisted of mudflats that were submerged below water. Due to this, evidence of Aboriginal occupation is not predicted to be present on site. Consultation with representatives of the Aboriginal community has not identified social values or significance related to the site.



8.0 PROPOSED ACTIVITY

8.1. Proposal

The proposed development is for the construction of a school whereby the project is known as Sydney Olympic Park new high school. The school is to be developed in two stages. The SSD application will seek consent for both Stage One and Stage Two. While Stage Two is submitted as part of this proposal, construction is subject to approval of additional funding.

Stage One will provide for a Stream 5 high school, catering for up to 850 students. Stage Two will bring the school up to a stream 9 school capability catering up to 1,530 students.

The design features a six storey building. To the north of the site, a hall building (for sports and performance) is proposed. The play space required to meet the need of students for Stage One can be generally accommodated onsite, within the 9,511sqm available. Additional play space may be required to accommodate the increased student numbers anticipated during Stage 2. The proposed adjoining play space comprises an area of around 8,800sqm, and will be subject to a Joint Use Arrangement and available for public use outside school hours. The future Wentworth Point Peninsula Park will result in an open space area of approximately 4 ha.

The remainder of the peninsula (TfNSW land) is under review and will be subject to a separate approval process. Redevelopment of this land will include the new access road proposed off Burroway Road along the eastern boundary of the subject site and is proposed to include car parking, drop-off zones and delivery zones.

8.2. Impact

As the study area is reclaimed land without the potential to contain Aboriginal sites, there will be no impacts to Aboriginal sites and therefore specific mitigation measures are not required.





9.0 **RECOMMENDATIONS**

The following recommendations are made based on:

- Legal requirements under the terms of the National Parks & Wildlife Act 1974 (as amended), which states that it is an offence to harm or desecrate an Aboriginal place or object without first gaining a permit under Part 6 of the National Parks & Wildlife Act 1974.
- Consultation with the Registered Aboriginal Parties as detailed in this report.
- Research into the archaeological record for the Cumberland Plain and the study area.
- Results of the assessment as outlined in this report.

IT IS THEREFORE RECOMMENDED THAT:

- 1. Aboriginal community consultation in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* should continue for the remainder of the project, including input into the design principles of the new high school.
- 2. As subsurface Aboriginal objects are not predicted to exist within the study area, no further Aboriginal archaeological assessment is required. This report satisfies Key Issue 7 'Aboriginal Cultural Heritage' of the SEARs.



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GLOSSARY

- Adze: an axe like bifacial tool with a bevelled bit or blade edge usually used to work wood, or sometimes to dig for root crops.
- Alluvium: material which is transported by a river and deposited at points along the flood plain of the river.
- Artefact: any object made by human agency. All lithic tools and lithic debitage are considered artefacts.
- Artefact scatter: also known as a surface scatter or open site, where prehistoric material such as artefacts and waste debris are lying exposed on the surface of the ground.
- Assemblage: a collection of artefacts from an archaeological site.
- Australian small tool tradition: a mid Holocene tool industry that appeared about 5,000 years ago when a new ensemble of small, flaked stone tools began to come into use. The types consisted of backed blades and flakes, Unifacial and bifacial points, and small adze flakes. There are some regional distributions of tools, including Bondi points, geometric microliths, Pirri points and Tula adzes.
- Axe: a stone artefact that has been ground on one or more sides to produce a sharp edge.
- **Backed blade:** a blade flake that has been abruptly retouched along one or more margins opposite an acute (sharp) edge. Backed pieces include backed blades and geometric microliths. They are thought to have been hafted onto wooden handles to produce composite cutting tools or spears. Backed blades are a feature of the "Australian small tool tradition", dating from between 5,000 and 1,000 years ago in south eastern Australia (Mulvaney 1975).
- Bifacial flaking or retouch: when flakes have been removed from two opposing faces.
- **Biomantle:** the upper part of soil produced by biodynamical agents and processes of which bioturbation is normally hierarchically dominant. By definition, it contains at least 50% biofabric, a condition met in essentially all topsoils.
- Bioturbation: the alteration of a site by non-human agency, e.g. burrowing animals, tree and grass roots, insects
- Blade: a flake that is at least twice as long as it is wide.
- **Bondi point:** a small, asymmetric backed point, named after Bondi Beach where it was first found, which is a component of the Australian small tool tradition. It is usually less than 5cm long and is sometimes described as a backed blade.
- Broad platform flake: a flake which has a platform which is as wide as, or wider than, the body of the flake.
- **Bulb of percussion:** a rounded bulge where the force from the hammerstone has radiated through the stone and split it from the core.
- **Burin:** a flake tool that was produced by the removal of two flakes at right angles to one another to produce a very fine sharp and durable edge.
- **Carved trees:** trees which have had designs carved into the bark or heartwood and in some areas may have been used to mark burial or initiation sites.
- **Chert:** a very fine crystalline aggregate of silica.
- **Context:** the time and space setting of an artefact, feature or culture. The context of a find is its position on a site, its relationship through association with other artefacts, and its chronological position as revealed through stratigraphy. An artefact's context usually consists of its immediate matrix (the material surrounding it, e.g. clay, gravel or sand), its provenience (horizontal and vertical position within the matrix), and its association with other artefacts (occurrence together with other archaeological remains, usually in the same matrix). The assessment of context includes study of what has happened to the find since it was deposited.
- **Core:** a piece of stone bearing one or more negative (concave) flake scars. A stone which has obviously had flakes and flaked pieces struck from it.
- Cortex: refers to the original weathered outer surface of the rock used to manufacture an artefact.

Debitage (debris): detached pieces that are discarded during the reduction process.



Distal end: the end opposite to the platform or the point end of a blade.

- **Dorsal surface:** the 'back' of the artefact or the side that was once part of the outside of the core or shows evidence of previous flake removals.
- Edge-ground artefact: an artefact (generally an axe or adze) whose cutting edges have been ground, rather than flaked, to form a sharp edge.
- **Eraillure scar:** the small flake scar on the dorsal side of a flake next to the platform. It is the result of rebounding force during percussion flaking.
- Erosion: the wearing away or loosening and transportation of soil or rock by water, wind and ice.
- **Fabricator:** a stone or bone artefact used in the manufacture of other tools. Often rod shaped and worn heavily on one end, it is used to chip flakes from a core, or to retouch a flake.
- Flake: any piece of stone removed from a larger mass (core) by application of force (percussion), and having a striking platform and bulb of percussion.
- Flaked piece: any stone struck from a larger mass by percussion but not containing all or any of the characteristics of a flake.
- Focal platform flake: a flake which has a platform narrower than the body of the flake.
- **Grinding groove:** a depression resulting from the sharpening of stone tools such as axes and adzes, usually located on surfaces of fine homogenous sandstone and near water.
- Grinding stone: a thick stone used as a mortar for grinding seeds, roots, tubers, or ochre.

Hammerstone: the stone that is used to remove flakes from the core.

- **Holocene:** that portion of geologic time that postdates the latest episode of continental glaciation. The Holocene Epoch is synonymous with the recent or postglacial interval of Earth's geologic history and extends from 10,000 years ago to the present day. It was preceded by the Pleistocene Epoch and is part of the Quaternary Period, a time characterised by dramatic climatic oscillations from warm (interglacial) to cold (glacial) conditions that began about 1.6 million years ago. The term Holocene is also applied to the sediments, processes, events, and environments of the epoch.
- Horizon (or soil horizon): the layers of the upper crust of the earth. The top, or O, horizon is the layer of undecomposed litter; the A horizon is topsoil, where most roots grow; B is the subsoil; and C is the parent rock material, broken into chunks. Although some roots can penetrate into the C horizon, few microorganisms live there.

Isolated find: a single stone artefact found on the surface of the land not in association with any other artefact.

- Knapping: the process of hitting one stone (core) with another (hammerstone) to produce a flaked artefact.
- Lamellate flaked piece: thin and wedge shaped, similar to a flake, but without the diagnostic features of a flake. A lamellate may by the distal end of a flake which has had its platform broken off.
- Lithic: anything made of stone. Derived from the Greek word meaning stone or anything pertaining to stone.

Manuport: piece of stone intended to be, or used as, a core that has been carried to the area from somewhere else.

- Microlith: a small (1 3cm long) flake with evidence of retouch. Bondi points, scrapers and backed blades are all types of microliths.
- Midden: a prehistoric refuse site chiefly composed of shell fragments.
- **Multidirectional core:** a lithic mass (core) with evidence of flaking originating from more than one direction and with more than a single striking platform.
- **Negative flake scar:** the scar left by the removal of a flake. The scar may also show a rounded depression which is the negative of the bulb of percussion.
- **Open site:** also known as a surface or artefact scatter, where prehistoric material such as artefacts and waste debris are lying exposed on the surface of the ground.
- **Pirri point:** a symmetrical leaf-shaped point, up to 7cm long, unifacially flaked all over its dorsal surface. The striking platform and bulb of percussion are sometimes removed to produce a rounded, thinned butt. Pirri points are



a component of the Australian small tool tradition, found generally in inland Australia. The term Pirri is an Aboriginal word for 'wood engraving tool'.

- Platform: the flat surface which receives percussion or pressure in the removal of a flake or flaked piece.
- Pleistocene: a geochronological division of geological time, an epoch of the Quaternary period following the Pliocene. During the Pleistocene, large areas of the northern hemisphere were covered with ice and there were successive glacial advances and retreats. The lower Pleistocene began about 1.8 million years ago; the Middle Pleistocene about 730,000 years ago; and the Upper Pleistocene about 127,000 years ago; it ended about 10,000 years ago. The Pleistocene was succeeded by the Holocene.
- Potential archaeological deposit (PAD): any location considered to have a moderate to high potential for subsurface archaeological material
- Potlid: small circular piece of stone that has literally "popped off" the surface of the artefact due to exposure to extreme heat.
- **Proximal end:** the 'top' of the artefact, or the part that the knapper hit to remove it from the core, where the platform is expected to be.
- Quarry: a location from which stone has been extracted in order to make stone artefacts.
- **Retouch:** refers to the secondary working of an artefact after it has been struck from the core. Retouch is used to sharpen the edges. It is the intentional modification of a stone tool edge by either pressure or percussion flaking techniques.
- Scarred trees: trees from which bark has been removed for the manufacture of everyday items such as containers, canoes or shields.
- Scraper: a generalised term used to describe a flake tool that has a retouched edge angle of approximately 60 to 90 degrees.
- Silcrete: silica-rich duricrust identified by the presence of complete granules or even pebbles within the matrix.
- **Stratigraphy:** the study and interpretation of the stratification of rocks, sediments, soils, or cultural debris, based on the principle that the lowest layer is the oldest and the uppermost layer is the youngest. The sequence of deposition can be assessed by a study of the relationships of different layers.
- **Taphonomy:** Literally, 'the laws of burial'. In archaeology, it is the study of the processes by which archaeological remains are transformed by human and natural processes during their incorporation into archaeological deposits, their subsequent long-term preservation within those deposits, and their recovery by archaeologists. The aim is to understand the processes resulting in the archaeological record.
- **Thumbnail scraper:** a small flake with a convex scraper edge, shaped like a thumbnail and located opposite the flake's platform. They exhibit unifacial retouch (usually on the ventral surface) and are usually less than 30mm in length.
- **Transect:** an arbitrary sample unit which is a linear corridor of uniform specified width. A straight line or narrow sections through an archaeological site, along which a series of observations or measurements is made.
- Tuff: a rock formed of volcanic fragments (generally ash).
- **Typology:** a scheme to order multiple types in a relational manner. A common typology orders types in a hierarchical manner.

Unidirectional core: a core with only one striking platform surface and with flake scars extending in only one direction.

Unifacial flaking or retouch: where flakes have been removed from one face only.



APPENDIX A: CONSULTATION

4.1.1 Identify if Native Title exists

We searched the National Native Title Tribunal for a list of registered native title claimants, native title holders and registered Indigenous Land Use Agreements (ILUAs). An up to date search was undertaken on 5 March 2021 and is included below. There are no current native title claims, holders or ILUAs relevant to the study area.

Search Register of Native Title Claims

The Register of Native Title Claims (RNTC) contains information about all claimant applications that have been registered. The Registrar is responsible for maintaining the RNTC.

Further information about the RNTC is available.

Tribunal file no.		
Federal Court file no.		
Application name		
State or Territory	ALL	
Representative A/TSI body area		
Local government area	City Of Parramatta Council	
Date filed between	and	
Sort by	Date filed 🗸	Search >

No results for current search criteria



Search National Native Title Register

The National Native Title Register (NNTR) is a register established under s. 192 of the Native Title Act 1993 (Cth).

The NNTR contains determinations of native title made by:

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

Further information about the NNTR is available.

Tribunal file no.		
Federal Court file no.		
Short name		
Case name		
State or Territory	ALL 🗸	
Registered Native Title Body Corporate*		
Representative A/TSI body area		
Local government area	City Of Parramatta Council	
Determination type	ALL 🗸	
Legal process	ALL 🗸	
Determination outcome	ALL 🗸	
Determination date between	and	
Sort by	Determination date 🗸	Search >
*Discourse in the second state in the line in the Discourse in the second state in the	stored Native Title Dady Oceanants and swell	the form the Office of the Devictors of

*Please note: current contact details for the Registered Native Title Body Corporate are available from the Office of the Registrar of Indigenous Corporations www.oric.gov.au

Your search returned 1 matches.

Short name	Case name	•	Determination date	Outcome
	Deerubbin Aboriginal Land Council v Attorney-General of New South Wales	Unopposed	07/09/2017	Native title does not exist


Search Register of Indigenous Land Use Agreements

Under the Native Title Act, the Registrar is responsible for maintaining the Register of Indigenous Land Use Agreements (ILUAs), which contains information about ILUAs that have been accepted for registration. The register entry for each ILUA must include:

- · a description of the area covered by the agreement
- · the name of each party to the agreement and the address at which the party can be contacted
- · if the agreement specifies the period during which it will operate that period
- if the agreement includes any statements regarding extinguishment, the validation or doing of future acts, contracting out of the 'right to negotiate' provisions of the Native Title Act, or changing the effect of 'intermediate period acts' on native title — a reference to that fact, setting out any such statements

The Registrar must remove details of the ILUA from the Register if:

- there is an approved determination of native title over the ILUA area and certain conditions exist, and the Court has not ordered that the ILUA should remain on the Register
- · a party tells the Registrar in writing that the agreement has expired
- all parties tell the Registrar in writing that they wish to terminate the agreement
- · the Federal Court orders the Registrar to remove the details of the agreement

If you have a question about a particular ILUA, please contact the parties to the agreement identified on the register extract for the ILUA. If you need assistance searching the Register of ILUAs, please email iluas@nntt.gov.au.

Tribunal file no.		
ILUA name		
ILUA type	ALL	
State or Territory	New South Wales	
Representative A/TSI body area		
Subject Matter		
Date registered between	and	
Sort by	Date registered 🗸	Search >

Your search returned 24 matches.

			Your search returned 24 matches.	
ILUA name	ILUA type	Subject matter(s)	Tribunal file no	Date registered
St Ives Pistol Club and Awabakal and Guringai People and Ors ILUA	Area Agreement	Access, Development	NI2020/001	01/09/2020
Cavanbah (Byron Bay) Arakwal Indigenous Land Use Agreement	Area Agreement	Native Title Settlement, Access, Community, Consultation protocol	NI2019/005	20/05/2020
Buronga HealthOne ILUA	Body Corporate	Government, Development	NI2019/006	04/03/2020
Copmanhurst Projects ILUA	Area Agreement	Mining, Infrastructure	NI2019/001	04/10/2019
Barkandji Single Dealings ILUA	Body Corporate	Extinguishment, Tenure resolution	NI2019/004	10/09/2019
Barkandji RNTBC Keltren ILUA	Body Corporate	Extinguishment, Not specified	NI2019/002	30/07/2019
Yaegl Interim Licences ILUA	Body Corporate	Native Title Settlement, Not specified	NI2018/006	20/11/2018
Barkandji Interim Licences ILUA	Body Corporate	Not specified	NI2018/007	20/11/2018





Bandjalang Interim Licences ILUA	Body Corporate	Not specified	NI2018/008	20/11/2018
Gumbaynggirr (Boney) Settlement ILUA	Area Agreement	Extinguishment, Native Title Settlement	NI2018/004	26/07/2018
Gumbaynggirr Wenonah Head ILUA	Area Agreement	Native Title Settlement, Tenure resolution	NI2018/005	26/07/2018
Barkandji Appin Station ILUA	Area Agreement	Native Title Settlement	NI2018/002	13/07/2018
Barkandji Weinteriga and Yobel Station ILUA	Area Agreement	Native Title Settlement	NI2018/003	13/07/2018
Western Bundjalung Settlement ILUA	Area Agreement	Government, Consultation protocol, Tenure resolution	NI2018/001	12/07/2018
Tubba-Gah ILUA	Area Agreement	Native Title Settlement, Co-management	NI2015/001	12/01/2016
Gundungurra Area Agreement	Area Agreement	Native Title Settlement, Consultation protocol	NI2014/001	27/02/2015
Cubbitch Barta Clan of the Dharawal People Indigenous Land Use Agreement	Area Agreement	Access	NI2010/001	16/03/2011
Bundjalung People of Byron Bay (ILUA 2)	Area Agreement	Co-management, Consultation protocol, Extinguishment	NI2006/004	22/04/2008
Ti Tree Lake (Taylor's Lake) (ILUA 3)	Area Agreement	Co-management, Consultation protocol	NI2006/005	22/04/2008
Gundungurra Taralga Wind Farm Agreement	Area Agreement	Development, Commercial	NI2006/002	13/12/2007
Githabul People ILUA	Area Agreement	Access, Co-management, Consultation protocol, Extinguishment, Terms of Access	NI2006/001	15/08/2007
Twofold Bay	Area Agreement	Infrastructure, Transport	NI2001/003	29/04/2002
Powercoal Pty Ltd, Victor Perry, Stephen Seiver & NSW ALC ILUA Area Agreement	Area Agreement	Mining, Large mining	NIA2000/001	29/08/2001
Bunjalung of Byron Bay (Arakwal)	Area Agreement	Development, Community	NIA2001/001	28/08/2001



Search National Native Title Register

The National Native Title Register (NNTR) is a register established under s. 192 of the Native Title Act 1993 (Cth).

The NNTR contains determinations of native title made by:

- the High Court of Australia
- · the Federal Court of Australia
- · or a recognised body such as South Australia's Supreme Court and Environment Resources and Development Court.

Further information about the NNTR is available.

Tribunal file no.		
Federal Court file no.		
Short name		
Case name		
State or Territory	ALL	
Registered Native Title Body Corporate*		
Representative A/TSI body area		
Local government area	City Of Parramatta Council	
Determination type	ALL 🗸	
Legal process	ALL 🗸	
Determination outcome	ALL 🗸	
Determination date between	and	
Sort by	Determination date	Search >

*Please note: current contact details for the Registered Native Title Body Corporate are available from the Office of the Registrar of Indigenous Corporations www.oric.gov.au

Your search returned 1 matches.

Short name	Case name	•	Determination date	Outcome
Deerubbin Local Aboriginal Land Council	Deerubbin Aboriginal Land Council v Attorney-General of New South Wales	Unopposed	07/09/2017	Native title does not exist



4.1.2 Ascertaining the names of people who may hold cultural knowledge

We wrote to the following organisations. Copies of the emails follow.

- Heritage NSW
- Metropolitan Local Aboriginal Land Council
- The Registrar, Aboriginal Land Rights Act 1983 for a list of Aboriginal owners
- Native Title Services Corporation Limited (NTSCORP Limited)
- The City of Parramatta Council
- Local Land Services



From: Jillian Comber
Sent: Friday, 18 December 2020 11:16 AM
To: Heritage NSW AHIP applications (heritagemailbox@environment.nsw.gov.au)
<heritagemailbox@environment.nsw.gov.au>; council@cityofparramatta.nsw.gov.au; NTSCorp
(information@ntscorp.com.au) <information@ntscorp.com.au>; metrolalc@metrolalc.org.au; Margaret Bottrell
(margaret.bottrell@lls.nsw.gov.au) <margaret.bottrell@lls.nsw.gov.au>
Cc: loan Morgan <imorgan@essencepm.com.au>; Veronica Norman (veronica.norman@comber.net.au)
<veronica.norman@comber.net.au>
Subject: Sydney Olympic Park High School, 3 Burroway Road, Wentworth Point

SYDNEY OLYMPIC PARK HIGH SCHOOL, 3 BURROWAY ROAD, WENTWORTH POINT ABORIGINAL CULTURAL HERITAGE CONSULTATION

The Department of Education through School Infrastructure NSW of 259 George Street, Sydney, propose the redevelopment of the High School at 3 Burroway Road, Wentworth Point, located within the Parramatta Local Government Area. The study area comprises Lot 201 DP121668 and portions of Lot 202 and Lot 203 DP 121668. The proposed development will be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*.

Comber Consultants has been engaged by School Infrastructure NSW to undertake Aboriginal community consultation in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.* Therefore, I am writing to you to ascertain if you are aware of Aboriginal people or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and or/places within the study area. If so, I would be pleased if you could forward their contact details to me.

Kind regards

DR JILLIAN COMBER

ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0418 788 802 E jillian.comber@comber.net.au





From: Jillian Comber
Sent: Friday, 18 December 2020 11:19 AM
To: alc@oralra.nsw
Cc: Ioan Morgan <imorgan@essencepm.com.au>
Subject: 3 Burroway Road, Wentworth Point

SYDNEY OLYMPIC PARK HIGH SCHOOL, 3 BURROWAY ROAD, WENTWORTH POINT ABORIGINAL CULTURAL HERITAGE CONSULTATION

The Department of Education through School Infrastructure NSW of 259 George Street, Sydney, propose the redevelopment of the High School at 3 Burroway Road, Wentworth Point, located within the Parramatta Local Government Area. The study area comprises Lot 201 DP121668 and portions of Lot 202 and Lot 203 DP 121668. The proposed development will be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the Environmental Planning and Assessment Act 1979.

Comber Consultants has been engaged by School Infrastructure NSW to undertake Aboriginal community consultation in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.* Therefore, I am writing to you to ascertain if you are aware of Aboriginal people or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and or/places within the study area. If so, I would be pleased if you could forward their contact details to me.

I would also be pleased if you could provide me with a list of Aboriginal owners.

Kind regards

DR JILLIAN COMBER

ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0418 788 802 E jillian.comber@comber.net.au



Responses to 4.1.2

A response from Heritage NSW with a list of known Aboriginal parties for the Parramatta LGA was received on 21 December 2020.



4.1.3 to 4.1.8 Newspaper Advertisement

An advertisement was placed in the digital edition of the Inner West Courier from 24th December 2020 to 28th January 2021 with a closing date of 22nd January 2021.

 Back to results | All Classifieds > Notices > Public Notices
 ABORIGINAL CULTURAL HERITAGE Date listed: 24/12/2020 ABORIGINAL CULTURAL HERITAGE SYDNEY OLYMPIC PARK HIGH SCHOOL **3 BURROWAY ROAD, WENTWORTH POINT** NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS The Department of Education through School Infrastructure NSW of 259 George Street, Sydney, propose the redevelopment of the high school at 3 Burroway Road, Wentworth Point, located within the Parramatta Local Government Area. Aboriginal archaeological testing and salvage may be undertaken. The proposal is to be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the Environmental Planning and Assessment Act 1979. This requires Aboriginal community consultation to be undertaken in accordance with Aboriginal cultural heritage consultation requirements for proponents 2010. Registrations of interest are sought from Aboriginal people who hold cultural knowledge relevant to determining the significance of any potential Aboriginal objects or sites at this location. This will assist in the assessment of the proposal by the Department of Planning. Please note that details of Aboriginal people or organisations who register an interest will be forwarded to Heritage NSW and the Metropolitan Local Aboriginal Land Council (MLALC). If you do not want your details forwarded, please specify this when registering. Comber Consultants Pty Ltd has been engaged to undertake the archaeological assessment and consultation. You can register, indicating the nature of your interest by phone or in writing to: Veronica Norman Comber Consultants Pty Ltd 76 Edwin Street North Croydon NSW 2132 Tel: 0419 118... Fax: (02) 9799 ... veronica.norman@comber.net.au REGISTRATIONS MUST BE RECEIVED BY FRIDAY 22ND JANUARY 2020.



4.1.3 to 4.1.8 Notification of project

We wrote to people/organisations whose names were obtained in step 4.1.2 and the relevant Local Aboriginal Land Council to notify them of the proposed project. Copies of the emails and letters appear below.

We wrote to:

From: Jillian Comber

Sent: Friday, 8 January 2021 5:28 PM

To: Amanda Hickey (amandahickey@live.com.au) <amandahickey@live.com.au>; Andrew Bond (dharugchts@gmail.com) <dharugchts@gmail.com>; Anna (daruglandobservations@gmail.com) <daruglandobservations@gmail.com>; Arika Jalomaki (yulayculturalservices@gmail.com) <yulayculturalservices@gmail.com>; Basil Smith (goobahchts@gmail.com) <goobahchts@gmail.com>; Bo Field (yurrandaali_cs@hotmail.com) <yurrandaali_cs@hotmail.com>; Caine Carroll (Goodradigbee1@outlook.com) <Goodradigbee1@outlook.com>; Carolyn Hickey (cazadirect@live.com) <cazadirect@live.com>; Clive Freeman (clive.freeman@y7mail.com) <clive.freeman@y7mail.com>; Corey Smith (cullendullachts@gmail.com) <cullendullachts@gmail.com>; Daniel Chalker (woriwooilywa@gmail.com) <woriwooilywa@gmail.com>; Darleen Johnson (murrabidgeemullangari@yahoo.com.au) <murrabidgeemullangari@yahoo.com.au>; Darrenjohnduncan@gmail.com; didgengunawalclan@yahoo.com.au; DTAC (darug tribal@live.com.au) <darug_tribal@live.com.au>; Hayley Bell (wingikarachts@gmail.com) <wingikarachts@gmail.com>; Hika Tekowhai (walbunja@gmail.com) <walbunja@gmail.com>; Jamie Eastwood (james.eastwood@y7mail.com) <james.eastwood@y7mail.com>; Jesse Carroll-Johnson (muragadi@yahoo.com.au) <muragadi@yahoo.com.au>; Joanne Anne Stewart (jerringong@gmail.com) <jerringong@gmail.com>; John Carriage (thoorganura@gmail.com) <tbody Kaarina Slater (ngambaaculturalconnections@hotmail.com) <ngambaaculturalconnections@hotmail.com>; Kara Bond (baduchts@gmail.com) <baduchts@gmail.com>; Kaya Dawn Bell (munyungachts@gmail.com) <munyungachts@gmail.com>; Kerri Slater (Wurrumay@hotmail.com) <Wurrumay@hotmail.com>; koori@ozemail.com.au; Kylie Ann Bell (gunyuuchts@gmail.com) <gunyuuchts@gmail.com>; Lee Field (barrabyculturalservices@gmail.com <barrabyculturalservices@gmail.com>; Mark Dyer (markdyer2009@live.com.au) <markdyer2009@live.com.au>; Mark Henry (murrumbul@gmail.com) <murrumbul@gmail.com>; metrolalc@metrolalc.org.au; Nola Hampton (kinghampton@77gmail.com) <kinghampton@77gmail.com>; nundagurri@gmail.com; Patricia Hampton (hsb heritageconsultants@mail.com) <hsb_heritageconsultants@mail.com>; Paul Hand (paulhand1967@gmail.com) <paulhand1967@gmail.com>; Pemulwuy Johnson (pemulwuyd@gmail.com) <pemulwuyd@gmail.com>; Phil Khan (philipkhan.acn@live.com.au) <philipkhan.acn@live.com.au>; Phillip Carroll (mura.indigenous@bigpond.com) <mura.indigenous@bigpond.com>; Ralph Hampton (hamptonralph46@gmail.com) <hamptonralph46@gmail.com>; Robert Parson (yerramurra@gmail.com) <yerramurra@gmail.com>; Robert Slater (galamaay@hotmail.com) <galamaay@hotmail.com>; Rodney Gunther (waawaar.awaa@gmail.com) <waawaar.awaa@gmail.com>; Ronald Stewart (walgaluchts@gmail.com) <walgaluchts@gmail.com>; Roxanne Smith (murramarangchts@gmail.com) <murramarangchts@gmail.com>; Scott Franks (scott@tocomwall.com.au) <scott@tocomwall.com.au>; Seli Storer (biamangachts@gmail.com) <biamangachts@gmail.com>; Shane Carriage (thauairachts@gmail.com) <thauairachts@gmail.com>; Simalene Carriage (bilingachts@gmail.com)
<bilingachts@gmail.com>; Stephen Fields (dhinawan.ch@gmail.com) <dhinawan.ch@gmail.com>; Steve Randall [srandall@deerubbin.org.au] <srandall@deerubbin.org.au>; Steven Johnson and Krystie Carroll (ginninderra.corp@gmail.com) <ginninderra.corp@gmail.com>; Tony Williams <ajw1901@bigpond.com> <ajw1901@bigpond.com>; waarlan12@outlook.com; warragil_c.s@hotmail.com; Wendy Smith (gulagachts@gmail.com) gulagachts@gmail.com



Subject: 3 Burroway Road, Wentworth Point

SYDNEY OLYMPIC PARK HIGH SCHOOL – 3 BURROWAY ROAD, WENTWORTH POINT

NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS

The Department of Education through School Infrastructure NSW of 259 George Street, Sydney, propose the redevelopment of the high school at 3 Burroway Road, Wentworth Point, located within the Parramatta Local Government Area. Aboriginal archaeological testing and salvage may be undertaken. The proposal is to be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*. This requires Aboriginal community consultation to be undertaken in accordance with *Aboriginal cultural heritage consultation requirements for proponents 2010*.

Registrations of interest are sought from Aboriginal people who hold cultural knowledge relevant to determining the significance of any potential Aboriginal objects or sites at this location. This will assist in the assessment of the proposal by the Department of Planning.

Please note that details of Aboriginal people or organisations who register an interest will be forwarded to Heritage NSW and the Metropolitan Local Aboriginal Land Council (MLALC). If you do not want your details forwarded, please specify this when registering.

Comber Consultants Pty Ltd has been engaged to undertake the archaeological assessment and consultation. You can register, indicating the nature of your interest by phone or in writing to:

Veronica Norman Comber Consultants Pty Ltd 76 Edwin Street North Croydon NSW 2132 Tel: 0419 118 399 Fax: (02) 9799 6011 veronica.norman@comber.net.au

REGISTRATIONS MUST BE RECEIVED BY FRIDAY 5th FEBRUARY 2021.

Kind regards

DR JILLIAN COMBER

ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0418 788 802 E jillian.comber@comber.net.au





21st January 2021

Mr Aaron Broad Minnamunnung 1 Waratah Avenue Albion Park Rail NSW 2527

Dear Aaron

The Department of Education through School Infrastructure NSW of, 259 George Street, Sydney, propose the redevelopment of the high school at 3 Burroway Road, Wentworth Point located within the Parramatta Local Government Area. Aboriginal archaeological testing and salvage may be undertaken. The proposal is to be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*. This requires Aboriginal community consultation to be undertaken in accordance with *Aboriginal cultural heritage consultation requirements for proponents 2010*.

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Agata Calabrese Comber Consultants Pty Ltd 76 Edwin Street North Croydon NSW 2132 Tel: (02) 9799 6000

PLEASE SEND YOUR RESPONSE BY 5th FEBRUARY 2021

Dr Jillian Comber Director/Archaeologist



21st January 2021

Mr James Carroll PO Box 124, Round Corner, NSW 2158

Dear James Carroll,

The Department of Education through School Infrastructure NSW of, 259 George Street, Sydney, propose the redevelopment of the high school at 3 Burroway Road, Wentworth Point located within the Parramatta Local Government Area. Aboriginal archaeological testing and salvage may be undertaken. The proposal is to be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*. This requires Aboriginal community consultation to be undertaken in accordance with *Aboriginal cultural heritage consultation requirements for proponents 2010*.

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Agata Calabrese Comber Consultants Pty Ltd 76 Edwin Street North Croydon NSW 2132 Tel: (02) 9799 6000

PLEASE SEND YOUR RESPONSE BY 5th FEBRUARY 2021

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Dr Jillian Comber Director/Archaeologist



Mr Lee-Roy James Boota 54 Blackwood Street Gerringong NSW 2534

Dear Lee Roy

The Department of Education through School Infrastructure NSW of, 259 George Street, Sydney, propose the redevelopment of the high school at 3 Burroway Road, Wentworth Point located within the Parramatta Local Government Area. Aboriginal archaeological testing and salvage may be undertaken. The proposal is to be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*. This requires Aboriginal community consultation to be undertaken in accordance with *Aboriginal cultural heritage consultation requirements for proponents 2010*.

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Agata Calabrese Comber Consultants Pty Ltd 76 Edwin Street North Croydon NSW 2132 Tel: (02) 9799 6000

PLEASE SEND YOUR RESPONSE BY 5th FEBRUARY 2021

كعرار

Dr Jillian Comber Director/Archaeologist





Responses received to notification

We received responses to the notification from the organisations listed below. Copies of those responses follow.

- Lilly Carroll & Paul Boyd, Didge Ngunawal Clan
- Basil Smith, Goobah Developments
- Kaarina Slater, Ngambaa Cultural Connections
- Danny Franks, Tocomwall
- Wendy Smith, Gulaga
- Phil Khan, Kamilaroi Yankuntjatjara Working Group
- Carolyn Hickey, A1 Indigenous Services
- Jamie Eastwood, Aragung Aboriginal Cultural Heritage Site Assessments
- Justine Coplin, Darug Custodian Aboriginal Corporation
- Arika Jalomaki, Yulay Cultural
- Rodney Gunther, Waawaar Awaa Aboriginal Corporation
- Ryan Johnson, Murra Bidgee Mullangari Aboriginal Corporation
- Shaun Carroll, Merrigarn
- Roxanne Smith, Murramarang
- Daniel Chalker, Wori Wooilywa
- Joel Tubbs & Corina Normann, Dharug Ngurra
- Nathan Moran, Metropolitan Local Aboriginal Land Council
- Phil Boney, Wailwan Aboriginal Group
- Name withheld
- Name withheld
- Name withheld



From: lilly carroll <didgengunawalclan@yahoo.com.au>
Sent: Friday, 8 January 2021 5:33 PM
To: Jillian Comber <jillian.comber@comber.net.au>; Veronica Norman <Veronica.Norman@comber.net.au>
Subject: Re: 3 Burroway Road, Wentworth Point

Hi Vanessa

DNC would like to register an interest into 3 Burroway Rd Wentworth point

Kind regards Paul Boyd & Lilly Carroll Directors DNC Sent from Yahoo Mail for iPhone

From: Phillip Boney <Waarlan12@outlook.com>
Sent: Friday, 8 January 2021 5:36 PM
To: Veronica Norman <Veronica.Norman@comber.net.au>
Subject: 3 Burroway Road, Wentworth Point

Hi,

Phil Boney here. I would like to register my participation in this project. Thank you.

Regards, Phil Boney Wailwan Aboriginal Group



From: Goobah <<u>goobahchts@gmail.com</u>> Sent: Sunday, 10 January 2021 1:18 PM To: Jillian Comber <<u>jillian.comber@comber.net.au</u>> Subject: Re: <u>3 Burroway Road, Wentworth Point</u>

This is my expression of interest with the above project and want to be informed of any further developments

From: Goobah <goobahchts@gmail.com>
Sent: Sunday, 10 January 2021 2:06 PM
To: Jillian Comber <jillian.comber@comber.net.au>
Subject: Re: 3 Burroway Road, Wentworth Point

Yes, it is 0405995725

On Sun, 10 Jan 2021 at 1:40 pm, Jillian Comber <<u>jillian.comber@comber.net.au</u>> wrote:

Thanks for your email. Goobah is now a Registered Aboriginal Party.

Is that Basil? If not can you please send me your name.

Thanks

Cheers

Jillian

From: Kaarina Slater <<u>Ngambaaculturalconnections@hotmail.com</u>>
Sent: Monday, 11 January 2021 11:06 AM
To: Veronica Norman <<u>Veronica.Norman@comber.net.au</u>>
Subject: SYDNEY OLYMPIC PARK HIGH SCHOOL – 3 BURROWAY ROAD, WENTWORTH POINT

Hi Veronica

Ngambaa Cultural connections would like to register our expression of interest for the project if any further information is required please don't hesitate to contact myself on

0422 861 400 NCC - kaarina slater

From: Kaarina Slater <<u>ngambaaculturalconnections@hotmail.com</u>>
Sent: Thursday, 4 February 2021 12:55 PM
To: Jillian Comber <<u>jillian.comber@comber.net.au</u>>
Subject: Re: 3 Burroway Road, Wentworth Point

Good Evening Jillian

Ngambaa Cultural Connection would like to register an interest for the above project.



Indigenous Site Officer & Current Insurances.

Kind Regards

Kaarina Slater Manager

From: Danny Franks <<u>danny@tocomwall.com.au</u>>
Sent: Monday, 11 January 2021 2:32 PM
To: Veronica Norman <<u>Veronica.Norman@comber.net.au</u>>
Subject: SYDNEY OLYMPIC PARK HIGH SCHOOL – 3 BURROWAY ROAD, WENTWORTH POINT

Hi Veronica,

Please accept this email as Tocomwall's ROI for the above mentioned project. Tocomwall would like to be engaged in all field work as well as consultation. Have a nice day. regards, Danny Franks **Cultural Heritage Manager** Tocomwall Pty Ltd M: 0415226725

From: Gulaga <gulagachts@gmail.com> Sent: Tuesday, 12 January 2021 8:22 AM To: Veronica Norman <<u>Veronica.Norman@comber.net.au</u>> Subject: SYDNEY OLYMPIC PARK HIGH SCHOOL – 3 BURROWAY ROAD, WENTWORTH POINT NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS

Please accept my expression of interest with this project and want to be kept in the loop for any further developments.

Kind Regards Wendy Smith Cultural Heritage Officer Gulaga 0401 808 988



From: philip khan <philipkhan.acn@live.com.au>
Sent: Sunday, 10 January 2021 5:22 PM
To: Jillian Comber <jillian.comber@comber.net.au>
Subject: RE: 3 Burroway Road, Wentworth Point

Hi Jillian,

Thank you for informing us that **Comber Consultants** will be involved in an Aboriginal Cultural Heritage Assessment at **3 Burroway Road, Wentworth Point** &, that you are inviting Aboriginal organisations to register, if they wish too be involved in the community consultation process.

As a senior Aboriginal person for the past 40yrs, I actively participate in the protection of the Aboriginal Cultural Heritage throughout the Sydney Basin, & particularly throughout Western Sydney, on behalf of Kamilaroi Yankuntjatjara Working Group I wish to provide to you my organisation's registration of interest.

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

Should you wish me to provide further information, please do not hesitate to contact me on 0434545982 or Stefeanie on 0451068480.

Kind Regards Phil Khan





From: Carolyn .H <<u>cazadirect@live.com</u>>
Sent: Sunday, 10 January 2021 5:27 PM
To: Jillian Comber <<u>jillian.comber@comber.net.au</u>>
Subject: Re: 3 Burroway Road, Wentworth Point

Contact: Carolyn Hickey

M: 0411650057

E: Cazadirect@live.com

A: 10 Marie Pitt Place, Glenmore Park, NSW 2745

ACN: 639 868 876

ABN: 31 639 868 876

Hi,

Thank you for your email, I would like to register in being involved in all levels of consultation for this project, such as, Meetings, Reports, Sharing Cultural Information, and available Field Work.

I've had many years' experience in helping preserve Aboriginal cultural heritage on projects, I hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and values that exist in the project area.

I have attached A1 Indigenous Services Insurances.

Please feel free to contact me on details supplied

Kind Regards,

Carolyn Hickey



From: James Eastwood <james.eastwood@y7mail.com>
Sent: Monday, 11 January 2021 10:29 AM
To: Jillian Comber <jillian.comber@comber.net.au>
Subject: Re: 3 Burroway Road, Wentworth Point

Dear Jillian

Thank you for your recent email Invitation RE: Sydney Olympic Park High School - 3 Burroway Road Wentworth Point Notification and Registration of Aboriginal Interest. Aragung Aboriginal cultural Heritage Site Assessments are glad to accept your invitation and would like to register a expression of interest to be considered to be involved in all aspects of the above mention project.

kind regards ARAGUNG Co/Jamie Eastwood





DARUG CUSTODIAN ABORIGINAL CORPORATION

PO BOX 81 WINDSOR 2756 PHONE: 0245775181 FAX: 0245775098 MOBILE: 0414962766 Justine Coplin EMAIL: justinecoplin@optusnet.com.au

Attention Comber Consultants Date: 110121 Subject: 3 Burroway Road, Wentworth Point

Dear Jillian

Our group is a non- profit organisation that has been active for over forty years in Western Sydney, we are a Darug community group with over three hundred members. The main aim in our constitution is the care of Darug sites, places, wildlife and to promote our culture and provide education on the Darug history. The Wentworth Point area is an area that our group has a vast knowledge of, we have worked and lived in for many years, this area is significant to the Darug people due to the connection of sites and the continued occupation. Our group has been involved in all previous assessments and works in this area as a traditional owner Darug group for the past 40 plus years.

Therefore we would like to register our interest for full consultation and involvement in the above project area.

Please contact us with all further enquiries on the above contacts. Regards

An

Justine Coplin

We acknowledge and pay respect to the Darug people, the traditional Aboriginal custodians of this land.

From: Arika Jalomaki <<u>yulayculturalservices@gmail.com</u>>
Sent: Tuesday, 12 January 2021 10:47 AM
To: Veronica Norman <<u>Veronica.Norman@comber.net.au</u>>
Subject: Regarding Sydney Olympic park high school

Dear Veronica,

Yulay Cultural service's would like to register our interest in the Sydney Olympic park high school 3 Burroway road Wentworth point and wish to be involved in all aspects of the project.

Kind regards,

Arika Jalomaki 0481 251 385 Manager



From: Rodney Gunther <<u>waawaar.awaa@gmail.com</u>> Sent: Tuesday, 12 January 2021 4:33 PM To: Jillian Comber <<u>jillian.comber@comber.net.au</u>> Subject: Re: 3 Burroway Road, Wentworth Point

Hi Jillian,

Please register Waawaar Awaa Aboriginal Corporation for the proposed redevelopment of the high school at 3 Burroway Road, Wentworth Point.

Waawaar Awaa Aboriginal Corporation is a local organisation situated in South Western Sydney.

Waawaar Awaa Aboriginal Corporation site officers are young and fit and have the skills, relevant experience to undertake any archaeological fieldwork.

Waawaar Awaa Aboriginal Corporation has the necessary certificates of currency (attached).

regards

Rodney Gunther 0410 580 962

From: Darleen Johnson <<u>murrabidgeemullangari@yahoo.com.au</u>> Sent: Wednesday, 13 January 2021 4:08 PM To: Jillian Comber <<u>jillian.comber@comber.net.au</u>> Subject: Re: 3 Burroway Road, Wentworth Point

Hi Jillian We would like to register our interest in the above project, we were born and bred here, I was born in Westmead Hospital and have lived in the area and surrounding areas all my life. Kind regards Ryan Johnson 0475565517

From: Shaun Carroll <<u>Merrigarn@hotmail.com</u>> Sent: Wednesday, 13 January 2021 4:10 PM To: Jillian Comber <<u>jillian.comber@comber.net.au</u>> Subject: Re: 3 Burroway Road, Wentworth Point

Dear Jillian Please register Merrigarn for the above project Kind regards Shaun Carroll



From: Murramarang <<u>murramarangchts@gmail.com</u>> Sent: Thursday, 14 January 2021 1:52 PM To: Veronica Norman <<u>Veronica.Norman@comber.net.au</u>> Subject: SYDNEY OLYMPIC PARK HIGH SCHOOL – 3 BURROWAY ROAD, WENTWORTH POINT NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS

Please accept my expression of interest with the above project and want to be kept informed of any further developments

Kind Regards Roxanne Smith Cultural Heritage Officer Murramarang

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





Wori Wooilywa **ABN: 40218677675** 261 Mockingbird Road, PHEASANTS NEST 2574 NSW M: 0409006216 Daniel woriwooilywa@gmail.com

To whom it may concern

We would like to acknowledge the land owners as the first nation's families of the country. We would like to acknowledge and pay thanks to mother earth for providing for us, Father for looking over us and the sprites for helping guide us. Also we pay our respects to the old the young and the new.

We thank you for your invitation to register for the Aboriginal Cultural Heritage Assessment at SYDNEY OLYMPIC PARK HIGH SCHOOL – 3 BURROWAY ROAD, WENTWORTH POINT. We would like to be involved in the consultation process and are also able to provide field workers if required.

Thank you again and please feel free to contact me if you require anything further.

Kind Regards

Daniel Chalker Wori Wooilywa P- 0409006216



To Protect and Preserve Darug Places and Sites | To Promote and Educate the wider community about Darug Heritage and Culture

PO Box 441 Blacktown, NSW, 2148 P | 02 9622 4081 E | achaeology<u>@dharugngurra.org.au</u> Website: www.darug.sydney



Dharug Ngurra Aboriginal Corporation ICN: 2734

Date: 27th Jan 2021

To: Veronica Norman from Comber Consultants Pty Ltd,

Thank you for the invitation to participate in the Aboriginal Cultural Heritage Assessment at SYDNEY OLYMPIC PARK HIGH SCHOOL – 3 BURROWAY ROAD, WENTWORTH POINT.

As Traditional Custodians of Dharug ngurra (country) our corporation supports Dharug yura (people) and serves the wider community in caring as-country. Our past, present and future is embedded in our ngurra and is enriched by our ancestral pathways that include our connection to sacred sites.

Protecting and preserving Dharug places is our core business, therefore, on behalf of our Members, Dharug Ngurra Aboriginal Corporation, formally known as Darug Tribal Aboriginal Corporation, do hereby request to be included in all activities regarding this project, including any future correspondence there from arising.

The Corporation is a Not for Profit entity, and as such, all net income, following payment of wages to archaeological workers, derived from our participation in the project, goes toward supporting our Members and the functioning of the Corporation and its services.

We can provide field workers, advisory, on site consulting, and other services as required.

- HOURLY RATE \$150.00 (plus GST)
- WORKSHOP RATE maximum of 2hrs \$300.00 (plus GST) per person

Certificate of currency available on request. Please do not hesitate to contact Joel Tubbs or Corina Norman on the following numbers:

Yours sincerely,

Joel Tubbs | 0422 450 822

Corina | 0402 534 773



4.1.6 Notification of Registered Aboriginal Parties

The below email was sent to MLALC and Heritage NSW on 9 February 2021 providing a list of Registered Aboriginal Parties (RAPs) and included the newspaper notification.



9th February 2021

TO: Heritage NSW heritagemailbox@environment.nsw.gov.au

Dear Madam/Sir

ABORIGINAL CONSULTATION

SCHOOL INFRASTRUCTURE NSW RE: SYDNEY OLYMPIC PARK HIGH SCHOOL 3 BURROWAY ROAD, WENTWORTH POINT

In accordance with section 4.1.6 of the *Aboriginal Cultural Heritage Consultation Requirement for Proponents 2010,* I advise that the following organisations have registered an interest in this project.

- Lilly Carroll & Paul Boyd, Didgengunawal Clan
- Phil Boney, Wailwan Aboriginal Group
- Basil Smith, Goobah Developments
- Donna Hickey and Steven Hickey, Widescope Indigenous Group
- Kaarina Slater, Ngambaa Cultural Connections
- Danny Franks, Tocomwall
- Wendy Smith, Gulaga
- Phil Khan, Kamilaroi Yankuntjatjara Working Group
- Carolyn Hickey, A1 Indigenous Services
- Jamie Eastwood, Ararung Aboriginal Cultural Heritage Site Assessments
- Justine Coplin, Darug Custodian Aboriginal Corporation
- Arika Jalomaki, Yulay Cultural
- Rodney Gunther, Waawaar Awaa Aboriginal Corporation
- Ryan Johnson, Murra Bidgee Mullangari Aboriginal Corporation
- Shaun Carroll, Merrigarn
- Roxanne Smith, Murramarang
- Name withheld
- Name withheld
- Name withheld
- Daniel Chalker, Wori Wooilywa
- Joel Tubbs & Corina Normann, Dharug Ngurra

Following please find email and advertisement advising Aboriginal organisations of the project and inviting them to register an interest.

Yours faithfully

Dr Jillian Comber Director/Archaeologist



EMAIL NOTIFICATION

From: Jillian Comber
Sent: Friday, January 8, 2021 5:28 PM
Subject: 3 Burroway Road, Wentworth Point
SYDNEY OLYMPIC PARK HIGH SCHOOL – 3 BURROWAY ROAD, WENTWORTH POINT
NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS

The Department of Education through School Infrastructure NSW of 259 George Street, Sydney, propose the redevelopment of the high school at 3 Burroway Road, Wentworth Point, located within the Parramatta Local Government Area. Aboriginal archaeological testing and salvage may be undertaken. The proposal is to be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the Environmental Planning and Assessment Act 1979. This requires Aboriginal community consultation to be undertaken in accordance with Aboriginal cultural heritage consultation requirements for proponents 2010.

Registrations of interest are sought from Aboriginal people who hold cultural knowledge relevant to determining the significance of any potential Aboriginal objects or sites at this location. This will assist in the assessment of the proposal by the Department of Planning.

Please note that details of Aboriginal people or organisations who register an interest will be forwarded to Heritage NSW and the Metropolitan Local Aboriginal Land Council (MLALC). If you do not want your details forwarded, please specify this when registering.

Comber Consultants Pty Ltd has been engaged to undertake the archaeological assessment and consultation. You can register, indicating the nature of your interest by phone or in writing to:

Veronica Norman Comber Consultants Pty Ltd 76 Edwin Street North Croydon NSW 2132 Tel: 0419 118 399 Fax: (02) 9799 6011 veronica.norman@comber.net.au

REGISTRATIONS MUST BE RECEIVED BY FRIDAY 5th FEBRUARY 2021.

Kind regards

DR JILLIAN COMBER ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0418 788 802 E jillian.comber@comber.net.au



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ABORIGINAL CULTURAL HERITAGE

Date listed: 24/12/2020

ABORIGINAL CULTURAL HERITAGE

SYDNEY OLYMPIC PARK HIGH SCHOOL

3 BURROWAY ROAD, WENTWORTH POINT

NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS

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Comber Consultants Pty Ltd has been engaged to undertake the archaeological assessment and consultation.

You can register, indicating the nature of your interest by phone or in writing to:

Veronica Norman

Comber Consultants Pty Ltd

76 Edwin Street North

Croydon NSW 2132

Tel: 0419 118...

Fax: (02) 9799 ...

veronica.norman@comber.net.au

REGISTRATIONS MUST BE RECEIVED BY FRIDAY 22ND JANUARY 2020.



9th February 2021

Mr Nathan Moran Chief Executive Officer Metropolitan Local Aboriginal Land Council officeadmin@metrolalc.org.au

Dear Mr Moran

ABORIGINAL CONSULTATION

SCHOOL INFRASTRUCTURE NSW RE: SYDNEY OLYMPIC PARK HIGH SCHOOL 3 BURROWAY ROAD, WENTWORTH POINT

In accordance with section 4.1.6 of the *Aboriginal Cultural Heritage Consultation Requirement for Proponents 2010,* I advise that the following organisations have registered an interest in this project.

- Lilly Carroll & Paul Boyd, Didgengunawal Clan
- Phil Boney, Wailwan Aboriginal Group
- Basil Smith, Goobah Developments
- Donna Hickey and Steven Hickey, Widescope Indigenous Group
- Kaarina Slater, Ngambaa Cultural Connections
- Danny Franks, Tocomwall
- Wendy Smith, Gulaga
- Phil Khan, Kamilaroi Yankuntjatjara Working Group
- Carolyn Hickey, A1 Indigenous Services
- Jamie Eastwood, Ararung Aboriginal Cultural Heritage Site Assessments
- Justine Coplin, Darug Custodian Aboriginal Corporation
- Arika Jalomaki, Yulay Cultural
- Rodney Gunther, Waawaar Awaa Aboriginal Corporation
- Ryan Johnson, Murra Bidgee Mullangari Aboriginal Corporation
- Shaun Carroll, Merrigarn
- Roxanne Smith, Murramarang
- Name withheld
- Name withheld
- Name withheld
- Daniel Chalker, Wori Wooilywa
- Joel Tubbs & Corina Normann, Dharug Ngurra

Following please find email and advertisement advising Aboriginal organisations of the project and inviting them to register an interest.

721

Dr Jillian Comber Director/Archaeologist



EMAIL NOTIFICATION

From: Jillian Comber Sent: Friday, January 8, 2021 5:28 PM Subject:3 Burroway Road, Wentworth Point

SYDNEY OLYMPIC PARK HIGH SCHOOL – 3 BURROWAY ROAD, WENTWORTH POINT NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS

The Department of Education through School Infrastructure NSW of 259 George Street, Sydney, propose the redevelopment of the high school at 3 Burroway Road, Wentworth Point, located within the Parramatta Local Government Area. Aboriginal archaeological testing and salvage may be undertaken. The proposal is to be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the Environmental Planning and Assessment Act 1979. This requires Aboriginal community consultation to be undertaken in accordance with Aboriginal cultural heritage consultation requirements for proponents 2010.

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Comber Consultants Pty Ltd has been engaged to undertake the archaeological assessment and consultation. You can register, indicating the nature of your interest by phone or in writing to:

Veronica Norman Comber Consultants Pty Ltd 76 Edwin Street North Croydon NSW 2132 Tel: 0419 118 399 Fax: (02) 9799 6011 veronica.norman@comber.net.au

REGISTRATIONS MUST BE RECEIVED BY FRIDAY 5th FEBRUARY 2021.

Kind regards

DR JILLIAN COMBER ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0418 788 802 E jillian.comber@comber.net.au



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ABORIGINAL CULTURAL HERITAGE

Date listed: 24/12/2020

ABORIGINAL CULTURAL HERITAGE

SYDNEY OLYMPIC PARK HIGH SCHOOL

3 BURROWAY ROAD, WENTWORTH POINT

NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS

The Department of Education through School Infrastructure NSW of 259 George Street, Sydney, propose the redevelopment of the high school at 3 Burroway Road, Wentworth Point, located within the Parramatta Local Government Area. Aboriginal archaeological testing and salvage may be undertaken.

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You can register, indicating the nature of your interest by phone or in writing to:

Veronica Norman

Comber Consultants Pty Ltd

76 Edwin Street North

Croydon NSW 2132

Tel: 0419 118...

Fax: (02) 9799 ...

veronica.norman@comber.net.au

REGISTRATIONS MUST BE RECEIVED BY FRIDAY 22ND JANUARY 2020.



4.2 Presentation of information

An invitation to attend a consultation meeting was sent to all RAPs on 5/2/2021. This email is included below.

From: Veronica Norman

Sent: Friday, 5 February 2021 4:07 PM

To: Amanda Hickey (amandahickey@live.com.au) <amandahickey@live.com.au>; Andrew Bond (dharugchts@gmail.com) <dharugchts@gmail.com>; Anna (daruglandobservations@gmail.com) <daruglandobservations@gmail.com>; Arika Jalomaki (yulayculturalservices@gmail.com) <yulayculturalservices@gmail.com>; Basil Smith (goobahchts@gmail.com) <goobahchts@gmail.com>; Bo Field (yurrandaali cs@hotmail.com) <yurrandaali cs@hotmail.com>; Caine Carroll (Goodradigbee1@outlook.com) <<u>Goodradigbee1@outlook.com</u>>; Carolyn Hickey (<u>cazadirect@live.com</u>) <<u>cazadirect@live.com</u>>; Clive Freeman (clive.freeman@y7mail.com) <clive.freeman@y7mail.com>; Corey Smith (cullendullachts@gmail.com) <<u>cullendullachts@gmail.com</u>>; Daniel Chalker (woriwooilywa@gmail.com) <woriwooilywa@gmail.com>; Darleen Johnson (murrabidgeemullangari@yahoo.com.au) <murrabidgeemullangari@yahoo.com.au>; Darrenjohnduncan@gmail.com; didgengunawalclan@yahoo.com.au; DTAC (darug tribal@live.com.au) <darug tribal@live.com.au>; Hayley Bell (wingikarachts@gmail.com) <wingikarachts@gmail.com>; Hika Tekowhai (walbunja@gmail.com) <walbunja@gmail.com>; Jamie Eastwood (james.eastwood@y7mail.com) <<u>james.eastwood@y7mail.com</u>>; Jesse Carroll-Johnson (<u>muragadi@yahoo.com.au</u>) <<u>muragadi@yahoo.com.au</u>>; Joanne Anne Stewart (jerringong@gmail.com) <jerringong@gmail.com>; John Carriage (thoorganura@gmail.com) <thoorganura@gmail.com>; Justine Coplin (justinecoplin@optusnet.com.au) <justinecoplin@optusnet.com.au>; Kaarina Slater (ngambaaculturalconnections@hotmail.com) <ngambaaculturalconnections@hotmail.com>; Kara Bond (baduchts@gmail.com) <baduchts@gmail.com>; Kaya Dawn Bell (munyungachts@gmail.com) <<u>munyungachts@gmail.com</u>>; Kerri Slater (<u>Wurrumay@hotmail.com</u>) <<u>Wurrumay@hotmail.com</u>>; koori@ozemail.com.au; Kylie Ann Bell (gunyuuchts@gmail.com) <gunyuuchts@gmail.com>; Lee Field (barrabyculturalservices@gmail.com <barrabyculturalservices@gmail.com>; Mark Dyer (markdyer2009@live.com.au) <markdyer2009@live.com.au>; Mark Henry (murrumbul@gmail.com) <murrumbul@gmail.com>; metrolalc@metrolalc.org.au; Nola Hampton (kinghampton@77gmail.com) <<u>kinghampton@77gmail.com</u>>; nundagurri@gmail.com; Patricia Hampton (<u>hsb_heritageconsultants@mail.com</u>) <hsb heritageconsultants@mail.com>; Paul Hand (paulhand1967@gmail.com) <paulhand1967@gmail.com>; Pemulwuy Johnson (pemulwuyd@gmail.com) <pemulwuyd@gmail.com>; Phil Khan (philipkhan.acn@live.com.au) <philipkhan.acn@live.com.au>; Phillip Carroll (mura.indigenous@bigpond.com) <<u>mura.indigenous@bigpond.com</u>>; Ralph Hampton (<u>hamptonralph46@gmail.com</u>) <hamptonralph46@gmail.com>; Robert Parson (yerramurra@gmail.com) <yerramurra@gmail.com>; Robert Slater (galamaay@hotmail.com) <galamaay@hotmail.com>; Rodney Gunther (waawaar.awaa@gmail.com) <waawaar.awaa@gmail.com>; Ronald Stewart (walgaluchts@gmail.com) <walgaluchts@gmail.com>; Roxanne Smith (<u>murramarangchts@gmail.com</u>) <<u>murramarangchts@gmail.com</u>>; Scott Franks (<u>scott@tocomwall.com.au</u>) <<u>scott@tocomwall.com.au</u>>; Seli Storer (<u>biamangachts@gmail.com</u>) <<u>biamangachts@gmail.com</u>>; Shane Carriage (thauairachts@gmail.com) <thauairachts@gmail.com>; Simalene Carriage (bilingachts@gmail.com)

bilingachts@gmail.com>; Stephen Fields (dhinawan.ch@gmail.com) <dhinawan.ch@gmail.com>; Steve Randall [srandall@deerubbin.org.au] <<u>srandall@deerubbin.org.au</u>>; Steven Johnson and Krystie Carroll (ginninderra.corp@gmail.com) <ginninderra.corp@gmail.com>; Tony Williams <ajw1901@bigpond.com> <ajw1901@bigpond.com>; waarlan12@outlook.com; warragil c.s@hotmail.com; Wendy Smith (gulagachts@gmail.com) <gulagachts@gmail.com>



Subject: 3 Burroway Road, Wentworth Point (SOPHS) - consultation meeting invitation

Hi Everyone

You are invited to a consultation meeting in respect of Sydney Olympic Park Highs School (SOPHS) located at 3 Burroway Road, Wentworth Point on Friday 12th February 2021 at 10am. Attached please find the meeting invitation and agenda. Could you please RSVP by Wednesday 10 February to advise if you are attending.

Please note that as this site is on reclaimed land we will not be recommending testing or salvage.

Unfortunately, we will not be able to walk over the site as it is fenced off. We will be holding the meeting outside the fenced area and will provide photos and maps of the study area and proposed development.

Kind regards,

VERONICA NORMAN ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0419 118 399 E <u>veronica.norman@comber.net.au</u>



INVITATION

ABORIGINAL CULTURAL HERITAGE CONSULTATION

PRESENTATION OF INFORMATION TO REGISTERED ABORIGINAL PARTIES

SYDNEY OLYMPIC PARK HIGH SCHOOL (SOPHS), 3 BURROWAY ROAD, WENTWORTH POINT

As a Registered Aboriginal Party (RAP) for the above project you are invited to attend an Aboriginal community consultation meeting. The purpose of the meeting is to present details of the project, discuss the archaeological methodology and to gather cultural information in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW). An agenda for the meeting follows.

Date: Friday 12th February 2021 Time: 10.00am Location: 3 Burroway Road, Wentworth Point. Please see maps attached. Please note we will not be able to walk over the site. We will hold the site meeting outside the fenced area.

As this is a community consultation meeting there will be no payment for attendance at this meeting. Such payment would be a conflict of interest.

Please forward your RSVP by Wednesday 10 February 2021 to:

Comber Consultants 76 Edwin Street North Croydon, NSW 2132 veronica.norman@comber.net.au Ph: 0419 118 399

Yours sincerely,

VNormon.

Veronica Norman Archaeologist/Heritage Consultant Comber Consultants



AGENDA

ABORIGINAL CULTURAL HERITAGE CONSULTATION

PRESENTATION OF INFORMATION TO REGISTERED ABORIGINAL PARTIES

SYDNEY OLYMPIC PARK HIGH SCHOOL (SOPHS), 3 BURROWAY ROAD, WENTWORTH POINT

Purpose: Aboriginal community consultation in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW). A record of this meeting, including agreed outcomes, will be provided to all Registered Aboriginal Parties (RAPs).

AGENDA

- 1. Welcome to Country or Acknowledgement of Country
- 2. Introduction
- 3. Outline of purpose of meeting
- 4. Outline of project and planning pathway
- 5. Discussion of study area being located on reclaimed land
- 6. Discussion of Aboriginal significance of the area, including contemporary significance
- 7. Open forum to discuss any issues of concern
- 8. Any other business/issues
- 9. Close



Aerial view of meeting location



Street view of meeting location


4.2 Responses to invitation

The following responses to the consultation meeting invitation was received:

- Justine Coplin from Darug Custodian Aboriginal Corporation advice by phone-call that she will attend the meeting on 09/03/2021.
- Phil Khan, KYWG, rang to discuss Wentworth Point and he is not sure whether he will attend. If he doesn't attend please include him as an apology.

From: James Eastwood <james.eastwood@y7mail.com</pre>
Sent: Saturday, 6 February 2021 3:11 PM
To: Veronica Norman <<u>Veronica.Norman@comber.net.au</u>
Subject: Re: 3 Burroway Road, Wentworth Point (SOPHS) - consultation meeting invitation

Dear Veronica

Thank you for your invitation to attend a Consultation meeting in respect to Sydney Olympic Parks High School (SOPHS) . unfortunately I have a prior engagement and will not be able to attend the meeting . However I do have some question that you may be able to address.

1 Has the soil of the proposed study area been completely remove to a B horizon , and been reclaimed by introduce fill.

2 Has there been sample Geo testing to test for natural soil profile or depth of reclaimed land.

kind regards Aragung Jamie Eastwood

Response to Jamie:

From: Veronica Norman
Sent: Monday, 8 February 2021 12:48 PM
To: James Eastwood <<u>james.eastwood@y7mail.com</u>>
Cc: Jillian Comber <<u>jillian.comber@comber.net.au</u>>
Subject: RE: 3 Burroway Road, Wentworth Point (SOPHS) - consultation meeting invitation

Hi Jamie,

Thank you for your response and for letting me know you won't be able to attend on Friday.

I have attached the Aboriginal heritage due diligence assessment Comber prepared last year for the project and provided some answers to your questions below.

- 1. Have the soils of the proposed study area been completely removed to a B horizon, and been reclaimed by introduced fill.
 - The study area is located within an area of landfill, Figure 3 in the report shows the extent of the landfilling. Prior to this, the area was made up of mudflats that would have been underwater and would not have been habitable. The area was reclaimed during the 1930s.
- 2. Has there been sample geo testing to test for natural soil profile or depth of reclaimed land.
 - At this stage no geotechnical work has been undertaken.

Please let me know if I can provide any further information.



Kind regards,

VERONICA NORMAN ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0419 118 399 E <u>veronica.norman@comber.net.au</u>

From: Gulaga <gulagachts@gmail.com>
Sent: Tuesday, 9 February 2021 8:35 PM
To: Veronica Norman <<u>Veronica.Norman@comber.net.au</u>>
Subject: Re: 3 Burroway Road, Wentworth Point (SOPHS) - consultation meeting invitation

Hi Veronica,

Unfortunately I am unable to attend, I do thank you for the invitation and can you please keep me updated on this project.

Kind Regards Wendy Smith Cultural Heritage Officer Gulaga 0401 808 988





BUTUCARBIN ABORIGINAL CORPORATION PO Box E18, Emerton NSW 2770 28 Pringle Road, Hebersham NSW 2770 Ph: 9832 7167 Fax: 9832 7263 koori@ozemail.com.au ABN: 83 535 742 276

To whom it may concern,

It has come to the attention of Butucarbin that s 3.4 of the *Aboriginal Cultural Heritage Guidelines for Proponents 2010*, has not been considered.

Pursuant to section 3.4, 'the proponent may reimburse Aboriginal people for any demonstrated reasonable out-of-pocket expenses directly incurred in order to participate in the consultation process.' Pursuant to the guidelines and example of 'a demonstrated reasonable expense' could be the 'documented loss of wages caused by the need to take time from paid employment to participate in meetings.'

With respect, your statement that "as this is a community consultation meeting there will be no payment for attendance at this meeting", does not meet the recommendation in section 3.4. Further, I find it difficult to reconcile a payment for time spent assisting your firm, as you argue, a conflict of interest. Consultation participants are, in fact, contributing their time, effort, costs and Indigenous cultural and intellectual property to the consultation process. It is our argument that a non-payment puts our integrity at stake and on the basis of participant's practical - travel expenses, loss of work - and intellectual input, pursuant to s 3.4, payment should be automatic.

We understand the archaeological firm, as the middleman, is the main source of contact for the proponent. We would appreciate if it could be conveyed to the proponent, that the *Aboriginal Cultural Heritage Guidelines for Proponents 2010*, is adhered to in future.

Yours Sincerely,

Jennifer Beale B.ED, Dip Counselling, Assoc Dip Ed, MNC, GNC. CEO



From: Veronica Norman Sent: Wednesday, February 10, 2021 10:34 AM To: Butucarbin Heritage <butuheritage@gmail.com> Cc: Jillian Comber <jillian.comber@comber.net.au> Subject: RE: Burroway Road

Dear Jennifer and Lowanna,

Thank you for your letter concerning the consultation meeting. I note your concern about payment for attendees who may have to forgo paid employment to attend the meeting. If it would assist, I am very happy to organise an after hours meeting at a time suitable to you. Please let me know a date and time that would suit.

Kind regards,

VERONICA NORMAN ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0419 118 399 E <u>veronica.norman@comber.net.au</u>





BUTUCARBIN ABORIGINAL CORPORATION PO Box E18, Emerton NSW 2770 28 Pringle Road, Hebersham NSW 2770 Ph: 9832 7167 Fax: 9832 7263 koori@ozemail.com.au ABN: 83 535 742 276

To whom it may concern,

Thank you for your understanding and your solution in organising an after hours meeting. As mentioned, an example of 'documented loss of wages' could be attending a meeting in work hours however, it is not a standalone example. Pursuant to section 3.4, a 'documented loss of wages caused by the need to take time from paid employment to participate in meetings' could also potentially be, fuel costs. Other costs must be considered.

Additionally – and I have brought this to the attention of Comber Consultants in previous years – it is extremely unethical to ask the Indigenous community for their Indigenous cultural and intellectual property, their assistance, time and labour in order to assist your firm in such work, without offering remuneration for such efforts. Unfortunately, the 'systemic undervaluing' of work done by Indigenous people is not a new concept and one which is kept alive in this industry.¹ This letter is not for the purposes to offend, it is for the purposes to ensure that there is an understanding that 30% of Indigenous families live below the poverty line and that Indigenous people also exist within this capitalist society, and by not remunerating the community for their efforts, your firm is partaking in exploitative practice and potentially contributing to this issue, in which the 'gap' just does not seem to close.

Lastly, it is now common practice in this industry, to remunerate the community for their intellect, labour and time offered in meetings. In the last two years, I have rarely come across an archaeological firm who fails in negotiating meeting costs with proponents and have never come across an archaeological firm who states that remuneration is a conflict of interest. In conclusion, Butucarbin does not have the capacity to assist archaeological firms on an unpaid basis and thus, it would be appreciated if we were removed from this consultation process.

Yours sincerely,

Jennifer Beale B.ED, Dip Counselling, Assoc Dip Ed, MNC, GNC. CEO

¹ See, Adrianne Walters, 'Why Aboriginal Australians are still having their wages 'stolen' 50 years after the Wave Hill Walk-off' ABC News (Website, Wednesday 29 November 2017) <<u>https://www.abc.net.au/news/2017-11-29/whv-aboriginal-australians-are-still-having-their-wages-</u>

stolen/9202472>



From: Veronica Norman
Sent: Thursday, February 11, 2021 4:48 PM
To: Butucarbin Heritage <butuheritage@gmail.com>
Cc: Jillian Comber <jillian.comber@comber.net.au>
Subject: RE: Burroway Road

Dear Jennifer and Lowanna

I note your comments concerning the costs of fuel. If it would be of assistance we could organise an after hours meeting and pick up your representative. Please suggest a date and time for the after hours meeting and the address of your representative.

Unfortunately, the budget that the client has provided does not include fuel costs – including our own. We drive ourselves to all consultation meetings and pay for the fuel ourselves. We also do not get paid for after hours meetings, but freely attend same to ensure that everyone can attend.

I note your comment about the community providing cultural information to assist our firm. Any information provided to us is not to assist our firm. It is to assist in the development of a complete significance assessment of a site by including social and cultural significance. This is to ensure that Aboriginal voices are heard and that the assessment does not just consider scientific significance. By strengthening the significance assessment of a site with cultural information, it can assist in ensuring protection of that site.

In respect of payment, any Aboriginal organisation that provides site officers for survey, testing or salvage are paid for their time, at the rate set by their organisation.

If you do not wish to attend the consultation meeting, I am happy to continue sending you information, so that you can be informed about the project. Please let me know if you do not wish to continue receiving information.

Kind regards,

VERONICA NORMAN ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0419 118 399 E <u>veronica.norman@comber.net.au</u>





BUTUCARBIN ABORIGINAL CORPORATION PO Box E18, Emerton NSW 2770 28 Pringle Road, Hebersham NSW 2770 Ph: 9832 7167 Fax: 9832 7263 koori@ozemail.com.au ABN: 83 535 742 276

To whom it may concern,

Thank you for providing a solution to this issue. We did, however, decide not to further consult with your firm on this project, which was clearly stated in the last email.

Your response raises a number of issues though:

- In relation to your comment on budgets, I do understand budgets are tight. However, relative to the tender process, it is to my understanding that you ensure the proponent adheres to the requirements listed in section 3.4. Subsequently, you should be including such costs in your tender documents. Furthermore, I think it is great that you attend consultation meetings after hours and pay for fuel yourselves. We, as a small Indigenous community organisation, however, simply do not have the capacity to do as you do.
- 2) I also find your argument of not equating the provision of Indigenous community cultural information with 'assistance', quite alarming. Although you have failed to acknowledge this as stated in the previous email there is an issue in this country, where the work done by Indigenous people is undervalued. Unfortunately, your firm is guilty of this. Your firm is surely receiving remuneration for undertaking the archaeological assessment and consultation. Such cultural knowledge a form of intellectual property that is passed on to your firm in the consultation process will, no doubt, be used in your assessment. This is the definition of assistance.¹ The fact that you fail to see this as 'work' is astounding and is honestly, the type of attitude that resulted in the Wave Hill walk off.
- 3) Furthermore, it is quite ironic that you place such significance on Indigenous voices being heard, but you ignore Butucarbin's Indigenous voice. This act of ignorance is tantamount to white noise, and your failure to even acknowledge the ethical issues - which I might add are issues relative to intellectual property and are concerning, even at an International legal level.

In conclusion, I sincerely hope you understand and consider our position in order to help create a better Aboriginal Cultural Heritage industry.

Your Sincerely,

Raymond Gibson Dip. Teach; B. Ed.; M. Mgt; Ph. D. Candidate

In accordance with their request, Butucarbin was not consulted with for the remainder of the project.

¹ Oxford Languages (online at 12 February 2021) 'Assistance' (def 1).



From: philip khan <philipkhan.acn@live.com.au>
Sent: Friday, 12 February 2021 1:31 PM
To: Veronica Norman <Veronica.Norman@comber.net.au>
Subject: RE: 3 Burroway Road, Wentworth Point (SOPHS) - consultation meeting invitation

Hi Veronica,

Dad had a chat with Jillian regarding this site, however our apologies he was not able to attend today due to other commitments.

Kind Regards Stefeanie



Sent from Mail for Windows 10



4.2.4 Consultation meeting

All RAPs were invited to attend a consultation, held on 12/2/2021. Minutes from the meeting are included below.

MINUTES OF MEETING HELD ON 12TH FEBRUARY 2021 AT 3 BURROWAY ROAD, WENTWORTH POINT PRESENTATION OF INFORMATION TO REGISTERED ABORIGINAL PARTIES REGARDING: SYDNEY OLYMPIC PARK HIGH SCHOOL AT WENTWORTH POINT (SOPHS)

PRESENT:

Dr Jillian Comber, Comber Consultants Veronica Norman, Comber Consultants Robert Crestani, School Infrastructure NSW Sherwin Rasquinha, School Infrastructure NSW

APOLOGIES:

Jamie Eastwood, Aragung Aboriginal Cultural Heritage Site Assessments Wendy Smith, Gulaga Phil Khan, Kamilaroi Yankuntjatjara Working Group Justine Coplin, Darug Custodian Aboriginal Corporation

BUSINESS

Jillian Comber, Veronica Norman, Robert Crestani and Sherwin Rasquinha were on site by 10am for the consultation meeting, and left site at 10.45am as no RAPs attended the meeting.

No business discussed.



4.3 Presentation of Methodology and gathering cultural information.

The proposed methodology below was sent to all RAPs on 8/2/2021 for a 28 day review and comment period. The methodology consultation period closed on 9/3/2021.

From: Veronica Norman

Sent: Monday, 8 February 2021 4:57 PM

To: 'Amanda Hickey (amandahickey@live.com.au)' <amandahickey@live.com.au>; 'Andrew Bond (dharugchts@gmail.com)' <dharugchts@gmail.com>; 'Anna (daruglandobservations@gmail.com)' <daruglandobservations@gmail.com>; 'Arika Jalomaki (yulayculturalservices@gmail.com)' <yulayculturalservices@gmail.com>; 'Basil Smith (goobahchts@gmail.com)' <goobahchts@gmail.com>; 'Bo Field (yurrandaali_cs@hotmail.com)' <yurrandaali_cs@hotmail.com>; 'Caine Carroll (Goodradigbee1@outlook.com)' <Goodradigbee1@outlook.com>; 'Carolyn Hickey (cazadirect@live.com)' <cazadirect@live.com>; 'Clive Freeman (clive.freeman@y7mail.com)' <clive.freeman@y7mail.com>; 'Corey Smith (cullendullachts@gmail.com)' <cullendullachts@gmail.com>; 'Daniel Chalker (woriwooilywa@gmail.com)' <woriwooilywa@gmail.com>; 'Darleen Johnson (murrabidgeemullangari@yahoo.com.au)' <murrabidgeemullangari@yahoo.com.au>; 'Darrenjohnduncan@gmail.com' <Darrenjohnduncan@gmail.com>; 'didgengunawalclan@yahoo.com.au' <didgengunawalclan@yahoo.com.au>; 'DTAC (darug_tribal@live.com.au)' <darug_tribal@live.com.au>; 'Hayley Bell (wingikarachts@gmail.com)' <wingikarachts@gmail.com>; 'Hika Tekowhai (walbunja@gmail.com)' <walbunja@gmail.com>; 'Jamie Eastwood (james.eastwood@y7mail.com)' <james.eastwood@y7mail.com>; 'Jesse Carroll-Johnson (muragadi@yahoo.com.au)' <muragadi@yahoo.com.au>; 'Joanne Anne Stewart (jerringong@gmail.com)' <jerringong@gmail.com>; 'John Carriage (thoorganura@gmail.com)' <thoorganura@gmail.com>; 'Justine Coplin (justinecoplin@optusnet.com.au)' <justinecoplin@optusnet.com.au>; 'Kaarina Slater (ngambaaculturalconnections@hotmail.com)' <ngambaaculturalconnections@hotmail.com>; 'Kara Bond (baduchts@gmail.com)' <baduchts@gmail.com>; 'Kaya Dawn Bell (munyungachts@gmail.com)' <munyungachts@gmail.com>; 'Kerri Slater (Wurrumay@hotmail.com)' <Wurrumay@hotmail.com>; 'koori@ozemail.com.au' <koori@ozemail.com.au>; 'Kylie Ann Bell (gunyuuchts@gmail.com)' <gunyuuchts@gmail.com>; 'Lee Field (barrabyculturalservices@gmail.com'
<barrabyculturalservices@gmail.com>; 'Mark Dyer (markdyer2009@live.com.au)' <markdyer2009@live.com.au>; 'Mark Henry (murrumbul@gmail.com)' <murrumbul@gmail.com>; 'metrolalc@metrolalc.org.au' <metrolalc@metrolalc.org.au>; 'Nola Hampton (kinghampton@77gmail.com)' <kinghampton@77gmail.com>; 'nundagurri@gmail.com' <nundagurri@gmail.com>; 'Patricia Hampton (hsb heritageconsultants@mail.com)' <hsb heritageconsultants@mail.com>; 'Paul Hand (paulhand1967@gmail.com)' <paulhand1967@gmail.com>; 'Pemulwuy Johnson (pemulwuyd@gmail.com)' <pemulwuyd@gmail.com>; 'Phil Khan (philipkhan.acn@live.com.au)' <philipkhan.acn@live.com.au>; 'Philip Carroll (mura.indigenous@bigpond.com)' <mura.indigenous@bigpond.com>; 'Ralph Hampton (hamptonralph46@gmail.com)' <hamptonralph46@gmail.com>; 'Robert Parson (yerramurra@gmail.com)' <yerramurra@gmail.com>; 'Robert Slater (galamaay@hotmail.com)' <galamaay@hotmail.com>; 'Rodney Gunther (waawaar.awaa@gmail.com)' <waawaar.awaa@gmail.com>; 'Ronald Stewart (walgaluchts@gmail.com)' <walgaluchts@gmail.com>; 'Roxanne Smith (murramarangchts@gmail.com)' <murramarangchts@gmail.com>; 'Scott Franks (scott@tocomwall.com.au)' <scott@tocomwall.com.au>; 'Seli Storer (biamangachts@gmail.com)'

 Carriage (bilingachts@gmail.com)' <bilingachts@gmail.com>; 'Stephen Fields (dhinawan.ch@gmail.com)' <dhinawan.ch@gmail.com>; 'Steve Randall [srandall@deerubbin.org.au]' <srandall@deerubbin.org.au>; 'Steven Johnson and Krystie Carroll (ginninderra.corp@gmail.com)' <ginninderra.corp@gmail.com>; 'Tony Williams <ajw1901@bigpond.com>' <ajw1901@bigpond.com>; 'waarlan12@outlook.com' <waarlan12@outlook.com>; 'warragil_c.s@hotmail.com' <warragil_c.s@hotmail.com>; 'Wendy Smith (gulagachts@gmail.com)' <gulagachts@gmail.com> Cc: Jillian Comber <jillian.comber@comber.net.au>

Subject: RE: 3 Burroway Road, Wentworth Point (SOPHS) - consultation meeting invitation



Hi Everyone,

Following on from the email below, please find attached the proposed methodology for the project. We will discuss the methodology at Friday's meeting. If you have any comments on the methodology could you please provide them by Tuesday 9th March 2021.

I have also attached the Aboriginal heritage due diligence assessment undertaken by Comber Consultants in January 2020. <u>Please note that as this site is on reclaimed land we will not be recommending testing or salvage.</u>

Kind regards,

VERONICA NORMAN ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0419 118 399 E <u>veronica.norman@comber.net.au</u>





ARCHAEOLOGY – HERITAGE – MEDIATION – ARBITRATION ABORIGINAL – HISTORIC - MARITIME 76 EDWIN STREET NORTH, CROYDON, NSW, 2132 **T** 02 9799 6000 **F** 02 9799 6011 enquiries@comber.net.au www.comber.net.au

> DIRECTORS DR JILLIAN COMBER | 0418 788 802 DAVID NUTLEY | 0408 976 553

A.2021

8th February 2021

METHODOLOGY SYDNEY OLYMPIC PARK HIGH SCHOOL AT WENTWORTH POINT

School Infrastructure NSW proposes the development of a high school at 3 Burroway Road, Wentworth Point. The proposal is to be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*. This requires Aboriginal community consultation to be undertaken in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010*.

The attached Due Diligence Assessment of the site indicates that 3 Burroway Road, Wentworth Point is reclaimed land. The proposed redevelopment will not impact upon any Aboriginal archaeological sites. The consultation is being undertaken to inform the Registered Aboriginal Parties about the project and to determine if the study area contains Aboriginal cultural significance.

In accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010, following is the consultation methodology:

- Relevant government agencies have been asked if they are aware of any Aboriginal organisations who may hold cultural knowledge relevant to determining the significance of the study area.
- All names obtained from the above were invited to register an interest.
- The project was advertised and interested Aboriginal organisations/people invited to register an interest.
- A meeting will be held on Friday 12th February and all Registered Aboriginal Parties are invited to attend. The aim of the meeting is to inform all RAPs about the project and to ascertain if the site contains cultural significance and to discuss any issues of concern.
- This methodology was sent out to all RAPs on 8th February 2021 who then have 28 days in which to provide any comment. Responses will be due on Tuesday 9th March 2021.
- At the end of the above 28 day period, the Aboriginal Cultural Heritage Assessment Report (ACHAR) is to be prepared and sent to all RAPs for comment. Another 28 days is allowed for responses to the ACHAR.
- Once all responses have been received the ACHAR is finalised.
- The final ACHAR will be submitted to Department of Planning, Industry and Environment (DPIE) to satisfy the Secretaries Environmental Assessment Requirements.



4.3 Responses to methodology

One response was received from Ngambaa Cultural Connections on 23/2/2021 agreeing with the methodology.

From: Kaarina Slater <<u>Ngambaaculturalconnections@hotmail.com</u>>
Sent: Tuesday, 23 February 2021 12:21 PM
To: Veronica Norman <<u>Veronica.Norman@comber.net.au</u>>
Subject: Re: 3 Burroway Road, Wentworth Point (SOPHS) - consultation meeting invitation

I've have read and agree with the above Methodology for the project.

I have ancestral & Knowledge of Country to the project area.

Experienced Indigenous Site Officer

Current Insurances

Kaarina slater 0422 729 117 NCC





4.4.2/4.4.3 Review of draft ACHAR

The draft ACHAR was sent to RAPs on 10/03/2021 for a 28 day review period, ending on 9 April 2021.

The following responses were received:

- Gulaga supports the ACHAR
- Waawaaar Awaa Aboriginal Corporation supports the ACHAR
- Kamilaroi-Yankuntjatjara Working Group support the ACHAR, and request that Aboriginal cultural interpretation be included in the development, including native garden beds, art work or displays.
- Ngambaa Cultural Connections supports the ACHAR.





From: Veronica Norman

Sent: Wednesday, 10 March 2021 4:27 PM
To: didgengunawalclan@yahoo.com.au; waarlan12@outlook.com; Basil Smith (goobahchts@gmail.com)
<goobahchts@gmail.com>; Ngambaaculturalconnections@hotmail.com; Danny Franks
<danny@tocomwall.com.au>; Gulaga <gulagachts@gmail.com>; philipkhan.acn@live.com.au; Carolyn Hickey
(cazadirect@live.com) <cazadirect@live.com>; Jamie Eastwood (james.eastwood@y7mail.com)
<james.eastwood@y7mail.com>; Justine Coplin (justinecoplin@optusnet.com.au)
<justinecoplin@optusnet.com.au>; Arika Jalomaki (yulayculturalservices@gmail.com)
<yulayculturalservices@gmail.com>; waawaar.awaa@gmail.com; Darleen Johnson
(murrabidgeemullangari@yahoo.com.au) <murrabidgeemullangari@yahoo.com.au>; Daniel Chalker
(woriwooilywa@gmail.com) <woriwooilywa@gmail.com>; darug_tribal@live.com.au; Steve Randall
[srandall@deerubbin.org.au] <srandall@deerubbin.org.au>
Cc: Jillian Comber <jillian.comber@comber.net.au>; Sandra Lim <slim@cadenceaust.com>
Subject: 3 Burroway Road, Wentworth Point (SOPHS) - ACHAR

Good afternoon,

Please find attached the draft Aboriginal Cultural Heritage Assessment Report for the Sydney Olympic Park new high school. Attached to the ACHAR is the technical report.

Could you please provide any comments you may have on the report by email or phone by 9 April 2021?

My contact details are:

M 0419 118 399 E veronica.norman@comber.net.au

Kind regards,

VERONICA NORMAN ARCHAEOLOGIST HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132 T (02) 9799 6000 F (02) 9799 6011 M 0419 118 399 E <u>veronica.norman@comber.net.au</u>





From: Gulaga <gulagachts@gmail.com>
Sent: Thursday, 11 March 2021 8:18 PM
To: Veronica Norman <Veronica.Norman@comber.net.au>
Subject: Re: 3 Burroway Road, Wentworth Point (SOPHS) - ACHAR

Hi Veronica,

Thank you for this report, I support the methodology.

Kind Regards Wendy Smith Cultural Heritage Officer Gulaga 0401 808 988

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

From: Rodney Gunther <waawaar.awaa@gmail.com>
Sent: Sunday, 14 March 2021 10:28 PM
To: Veronica Norman <Veronica.Norman@comber.net.au>; Jillian Comber <jillian.comber@comber.net.au>
Subject: Re: 3 Burroway Road, Wentworth Point (SOPHS) - ACHAR

Hi Veronica,

Waawaar Awaa Aboriginal Corporation supports the draft ACHAR for the Sydney Olympic Park new high school, 3 Burroway Road Wentworth Point as the study area consists entirely of land fill, no in situ soil deposits, water courses or geological formations that would indicate the possibility of Aboriginal objects being located across the site due to previous disturbance and reclamation of the area.

regards

Rodney Gunther



From: philip khan <philipkhan.acn@live.com.au>
Sent: Monday, 22 March 2021 3:43 PM
To: Veronica Norman <Veronica.Norman@comber.net.au>
Subject: Re: 3 Burroway Road, Wentworth Point (SOPHS) - ACHAR

Dear Veronica,

Thank you for your ACHAR for 3 Burroway Rd, Wentworth Point. Its unfortunate that the study area is highly disturbed and reclaimed land as the Aboriginal people may have thrived in this area. In saying that I would like to push for some sort of Aboriginal Cultural Interpretation plan for the future school development. There are many ways to incorporate Aboriginal Culture such as native garden beds, art work or a display of some sort. Please do not hesitate to consult with us through the Interpretation process. We agree to your recommendations and support your ACHAR.

Kind Regards





From: Kaarina Slater <Ngambaaculturalconnections@hotmail.com>
Sent: Wednesday, 7 April 2021 1:08 PM
To: Veronica Norman <Veronica.Norman@comber.net.au>; didgengunawalclan@yahoo.com.au;
waarlan12@outlook.com; Basil Smith (goobahchts@gmail.com) <goobahchts@gmail.com>; Danny Franks
<danny@tocomwall.com.au>; Gulaga <gulagachts@gmail.com>; philipkhan.acn@live.com.au; Carolyn Hickey
(cazadirect@live.com) <cazadirect@live.com>; Jamie Eastwood (james.eastwood@y7mail.com)
<james.eastwood@y7mail.com>; Justine Coplin (justinecoplin@optusnet.com.au)
<justinecoplin@optusnet.com.au>; Arika Jalomaki (yulayculturalservices@gmail.com)
<yulayculturalservices@gmail.com>; waawaar.awaa@gmail.com; Darleen Johnson
(murrabidgeemullangari@yahoo.com.au) <murrabidgeemullangari@yahoo.com.au>; merrigarn@hotmail.com;
Roxanne Smith (murramarangchts@gmail.com) <ducurramarangchts@gmail.com>; Daniel Chalker
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[srandall@deerubbin.org.au] <srandall@deerubbin.org.au>
Cc: Jillian Comber <jillian.comber@comber.net.au>; Sandra Lim <slim@cadenceaust.com>
Subject: Re: 3 Burroway Road, Wentworth Point (SOPHS) - ACHAR

On behalf of Ngambaa Cultural connections I've have read and agree with the above Methodology for the project.

I have ancestral & Knowledge of Country to the project area.

Experienced Indigenous Site Officer

Current Insurances

Kaarina slater 0422 729 117 NCC

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APPENDIX B: TECHNICAL REPORT



ARCHAEOLOGY - HERITAGE - MEDIATION - ARBITRATION

Sydney Olympic Park new high school

Aboriginal Archaeological Assessment Report

27th AUGUST **2021**

Report to:	School Infrastructure NSW
LGA:	City of Parramatta Council
Version:	E.2021



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DOCUMENT CONTROL

REV	DATE	PREPARED BY	EDITED BY	APPROVED BY
Α	05/03/2021	David Nutley, Veronica Norman	Dr Jillian Comber	Dr Jillian Comber
В	29/06/2021	David Nutley, Veronica Norman	Dr Jillian Comber	Dr Jillian Comber
С	09/07/2021	David Nutley, Veronica Norman	Dr Jillian Comber	Dr Jillian Comber
D	04/08/2021	David Nutley, Veronica Norman	Dr Jillian Comber	Dr Jillian Comber
E	27/08/2021	David Nutley, Veronica Norman	Dr Jillian Comber	Dr Jillian Comber

PROJECT NO. DE381 STATUS FINAL

INTEGRATED MANAGEMENT SYSTEM

Comber Consultants has a certified integrated management system to the requirements of ISO 9001 (quality), ISO 14001 (environmental), ISO 45001 (health and safety) and AS/NZS 4801 (health and safety). This is your assurance that Comber Consultants is committed to excellence, quality, and best practice and that we are regularly subjected to rigorous, independent assessments to ensure that we comply with stringent Management System Standards.





The Department of Education through School Infrastructure NSW (SINSW) has developed a Master Plan for the development of the Sydney Olympic Park new high school. The proposed development is located within the peninsula of Wentworth Point at 7-11 Burroway Road, Wentworth Park across parts of three lots; Lot 202 DP1216628, Lot 203 DP1216628 and Lot 204 DP1216628.

The school is to be developed in two stages. Proposed elements of the project include:

- A stream 9 school of 1,530 students
- Covered Outdoor Learning Area (COLA)
- Outdoor Learning Unit (attached to general learning areas)
- Outdoor Covered Workshop Unit

Planning Secretary's Environmental Assessment Requirements (SEARs) were issued for the project on 23 December 2020, application number SSD-11802230.

Background research undertaken for this report has determined that the study area is located entirely within land that was reclaimed by 1943. Prior to this, the area consisted of tidal mudflats that would have been regularly submerged under water and would not have been suitable for occupation. A site inspection confirmed that no natural soil deposits exist within the study area. Further, the study area is subject to tidal flooding. As such, Aboriginal archaeological potential within the study area has been assessed as nil.

The assessment and this report have been undertaken in accordance with Heritage NSW's *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* and makes the following recommendations:

- 1. Aboriginal community consultation in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* should continue for the remainder of the project, including input into the design principles of the new high school.
- 2. As subsurface Aboriginal objects are not predicted to exist within the study area, no further Aboriginal archaeological assessment is required.



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1.0 INTRODUCTION

1.1. Background

The Department of Education through School Infrastructure NSW (SINSW) has developed a Master Plan for the development of the Sydney Olympic Park new high school. The proposed development is located within the peninsula of Wentworth Point at 7-11 Burroway Road, Wentworth Park across parts of three lots; Lot 202 DP1216628, Lot 203 DP1216628 and Lot 204 DP1216628.

To ensure that the proposed new high school does not adversely impact upon Aboriginal archaeology, Comber Consultants were commissioned to undertake this Aboriginal Archaeological Assessment This assessment has been prepared in accordance with the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (2010).

1.2. Site description

The proposed development is located within the peninsula of Wentworth Point at 7-11 Burroway Road, Wentworth Park across parts of three lots; Lot 202 DP1216628, Lot 203 DP1216628 and Lot 204 DP1216628. The site forms part of the Wentworth Point Planned Precinct, which was rezoned in 2014 for the purposes of high density residential, public recreation, school and business purposes.

The site is approximately 9,511sqm in area, with a frontage of approximately 91m to Burroway Road. It currently contains vacant land, which is cleared of all past development, and almost entirely cleared of native vegetation.

The surrounding area is generally characterised by high rise residential and mixed-use developments. The site is directly adjacent to the Wentworth Point Peninsula Park and immediately east of Wentworth Point Public School.





Figure 1: Site aerial map (Source: Mecone)

1.3. Acknowledgements

This report was prepared by David Nutley, Grad. Dip, Maritime Archaeology, M. Built Env., M. Marit Arch, Archaeologist, Veronica Norman, B.A., M.A., Archaeologist . Dr Jillian Comber, B.A., Litt.B., PhD, Archaeologist, reviewed and approved this report.





2.0 LEGISLATION

2.1. National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NPW Act) provides statutory protection for all Aboriginal 'objects'. The NPW Act is administered by Heritage NSW within the Department of Premier & Cabinet. Part 6, Section 90 of the NPW Act details the provisions for the issue of a written consent to impact upon an Aboriginal object. An object is defined as:

Aboriginal Object

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

An Aboriginal Place means any place declared to be an Aboriginal Place under section 84. Section 84 states:

The Minister may, by order published in the Gazette, declare any place specified or described in the order, being a place that, in the opinion of the Minister, is or was of special significance with respect to Aboriginal culture, to be an Aboriginal place for the purposes of this Act.

Under Section 90 of the NPW Act it is an offence to harm an Aboriginal object without an Aboriginal Heritage Impact Permit (AHIP). However, as this site does not contain an Aboriginal objects and as this project will be assessed as a State Significant Development (see below) an AHIP will not be required.

2.2. Environmental Planning and Assessment Act 1979

This project is being undertaken as a State Significant Development (SSD) under Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EPA Act) and requires development consent from the Independent Planning Commission or the Minister for Planning (or delegate). Projects can be classified as State significant development if they are important to the State for economic, environmental or social reasons. The Department of Planning co-ordinates the detailed assessment of these projects.

s4.41 details the authorisations that are not required for State significant development, as detailed below. S4.41(d) states that an Aboriginal Heritage Impact Permit is not required.

4.41 Approvals etc legislation that does not apply

(cf previous s 89J)

- (1) The following authorisations are not required for State significant development that is authorised by a development consent granted after the commencement of this Division (and accordingly the provisions of any Act that prohibit an activity without such an authority do not apply)—
 - (a) (Repealed)
 - (b) a permit under section 201, 205 or 219 of the Fisheries Management Act 1994,
 - (c) an approval under Part 4, or an excavation permit under section 139, of the Heritage Act 1977,
 - (d) an Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974,
 - (e) (Repealed)
 - (f) a bush fire safety authority under section 100B of the Rural Fires Act 1997,
 - (g) a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the Water Management Act 2000.

Planning Secretary's Environmental Assessment Requirements

SEARs were issued for the project on 23 December 2020, application number SSD-11802230. Key Issue 7 relates to Aboriginal Cultural Heritage and is included below.

7. Aboriginal Cultural Heritage

- Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) that:
 - identifies and describes the Aboriginal cultural heritage values that exist across the site.



- \circ ~ includes surface surveys and test excavations where necessary.
- has been prepared in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW (OEH, 2010).
- incorporates consultation with Aboriginal people in accordance with Aboriginal Cultural Heritage Consultation Requirements for Proponents (Department of Environment, Climate Change and Water, 2010).
- documents the significance of cultural heritage values of Aboriginal people who have a cultural association with the land.
- o identifies, assesses and documents all impacts on the Aboriginal cultural heritage values.
- demonstrates attempts to avoid all impacts on the Aboriginal cultural heritage values and identify any conservation outcomes. Where impacts are unavoidable, the ACHAR and EIS must outline measures proposed to mitigate impacts.
- demonstrates attempts to interpret the Aboriginal cultural heritage significance identified into the development.

Any Aboriginal objects recorded as part of the Aboriginal Cultural Heritage Assessment Report must be documented and notified to the Aboriginal Heritage Information Management System (AHIMS) within Heritage NSW of the Department of Premier and Cabinet.



3.0 METHODOLOGY

This project was conducted in three stages, being background research, site inspection and report preparation, as detailed below.

Step 1: Background Research

Prior to the field component of this project, the Aboriginal Heritage Information Management System (AHIMS) was searched on 12 January 2021. A copy is attached as Appendix A. Site data, associated documents and archaeological survey reports held by AHIMS were reviewed. Environmental information relating to Aboriginal land use was also researched. Such research facilitated an understanding of the potential nature of sites and site patterning in the region, which enabled a predictive statement to be made. It also provided the archaeological and environmental context within which a significance assessment could be made, if any Aboriginal sites were located during survey.

Step 2: Site Inspection

The archaeological site inspection was undertaken on 19 January 2021 by Dr Jillian Comber, Veronica Norman, Agata Calabrese, Kadibulla Khan and Chris Jones of Comber Consultants. The whole of the study area was inspected on foot

Stage 3:

Further archaeological research was conducted where necessary to clarify the results of the research and site inspection and this report was compiled.



4.0 PROPOSAL

The proposed development is for the construction of a school whereby the project is known as Sydney Olympic Park new high school. The school is to be developed in two stages. The SSD application will seek consent for both Stage One and Stage Two. While Stage Two is submitted as part of this proposal, construction is subject to approval of additional funding.

Stage One will provide for a Stream 5 high school, catering for up to 850 students. Stage Two will bring the school up to a stream 9 school capability catering up to 1,530 students.

The design features a six storey building. To the north of the site, a hall building (for sports and performance) is proposed. The play space required to meet the need of students for Stage One can be generally accommodated onsite, within the 9,511sqm available. Additional play space may be required to accommodate the increased student numbers anticipated during Stage 2. The proposed adjoining play space comprises an area of around 8,800sqm, and will be subject to a Joint Use Arrangement and available for public use outside school hours. The future Wentworth Point Peninsula Park will result in an open space area of approximately 4 ha.

The remainder of the peninsula (TfNSW land) is under review and will be subject to a separate approval process. Redevelopment of this land will include the new access road proposed off Burroway Road along the eastern boundary of the subject site and is proposed to include car parking, drop-off zones and delivery zones.



5.0 ABORIGINAL HISTORY

5.1. Introduction

A brief summary of the Aboriginal history of the study area is included in this chapter. The history of Aboriginal connections to the Sydney Olympic Park area has been the subject of extensive research as part of the Sydney Olympic Park Aboriginal History & Connections Program undertaken Dr Paul Irish, historian and archaeologist, between 2002 - 2005. This research has been summarised in the report *Aboriginal People at Homebush Bay: From the Wann-gal to the Present Day* (Irish 2005). Dr Irish's report should be referred to for further information on the history of the region.

5.2. Wann

Wentworth Point is situated in an area of land called the Wann. The men of the Wann were referred to as Wann-gal and the women as Wann-galleon. The Wann extended along the southern shore of the Parramatta River, between the Gadiland of Cockle Bay/Darling Harbour and the Burramatta land (Rose Hill) (Irish 2006:26, Irish 2005). Due to these close connections, the Wann would have routinely interacted with their neighbours and, thus, they were likely bi-lingual speaking their own dialect as well as those from the adjacent communities (Irish 2006:26, Irish 2005).



Figure 2: The general location of the Wann (Attenbrow, 2010:23)

The length of the occupation of the Wann is unknown and no dating records in the immediate area are currently available. However, dating of occupation in the Sydney Basin as a whole confirms an Aboriginal presence of thousands of years. A site in North Parramatta has been dated to more than 7,500 years BP (Comber Consultants 2019:40; 2018:59). Another site has been shown to have been occupied repeatedly in the terminal Pleistocene, through to the Holocene from about 10,000 years BP (Comber Consultants 2018b:9). The earliest date recorded in the Sydney Basin is 30,000 years BP (McDonald 2006:4).

5.3. Food and subsistence

Almost no specific information is available about the traditional use of the tidal mudflats by the people of the Wann. Typically, estuarine ecosystems provided the Aboriginal communities with resources for food and tool manufacture as well as a means of travelling throughout the region by water. The area opposite Homebush Bay was a traditional fishing location for the Wann and their neighbouring communities but there is little other information available on the Aboriginal



camping places. Given these circumstances, Irish (2006:27) concluded that the Wann lived similarly to their neighbours of the Sydney area.

Aboriginal people continued their traditional use of the Homebush Bay area after their lands were granted to Europeans. Several encounters and conflicts between Europeans and Aboriginal people are documented for the Homebush Bay area throughout the 1790s. In the early 1800s Aboriginal people were working for and supplying fish to the Blaxlands on their Newington Property. In November 1788 in particular, the establishment of Rose Hill meant that there was a permanent European presence nearby the Wann land and that contact between the two parties was likely to have occurred.

Walker (1928:84) refers to fishing in the Parramatta River near to what became the Newington Armoury Precinct and the access provided by regular exposure of the mud flats allows inferences to be made on the harvesting of shellfish, crustaceans. When covered by tidal waters, the area is also likely to have been used for fishing from bark canoes.

5.4. European occupation

The major impact on Aboriginal occupation in the study area began with colonisation in 1788, quickly expanding along Parramatta River, past the study area, and on to Parramatta. Aboriginal use of the area for fishing and extraction of resources from the mud flats were rapidly curtailed by introduced regulations and through introduced diseases. As the Europeans began to expand across Sydney conflicts with Aboriginal people occurred. In order to prevent these conflicts, Governor Phillip in 1791, encouraged the trade of fish and other wares between Aboriginal people, the convicts and marines at Parramatta (Irish 2006:27). This plan, however, did not last long as within weeks convicts destroyed the canoe of a young Wallumetta man, Balloderry, who had been fishing along the river and bringing his catch into town (Irish 2006:27).

Irish (2006:28) suggests also that Aboriginal people were still cutting back from trees at Homebush Bay in the 1810s and it is likely that they were still fishing in the river and gathering food in these areas. Aboriginal groups in the region were able to continue using their languages, and from the 1790s a dialect developed among the Aboriginal communities of the area which was a mixture of an Aboriginal dialect and English (Irish 2006: 27-28). By the 1830s, however, it appears that there was a very limited number of Aboriginal people left living along the river, but many traditional beliefs and language were maintained through elders of the clan (Irish 2006: 28). After 1850 information on Aboriginal people in the area becomes increasingly scarce with only scattered references to Aboriginal people around the Parramatta River (Irish 2006:29).

5.5. The Aboriginal Community of Wentworth Point in the Twenty-first Century

The 2016 census recorded 36 Aboriginal and Torres Strait Islander people as living in Wentworth Point in the City of Parramatta LGA (2016 Census Stats). In the 2016 census, there were 186,320 people in Paramatta, of these, Aboriginal and/or Torres Strait Islander people made up 0.7% of the population (2016 Census Quickstats).

Although the Aboriginal population of Wentworth Point is small, the City of Parramatta LGA of which it is part continues to be an important meeting place for Aboriginal people.

It is clear that the lives of people who had lived according to traditional ways, including the people of the Wann, were catastrophically altered by European occupation from the late eighteenth century. Through perseverance and showing great resilience Aboriginal Australians retain and practice core traditions, language, customs and beliefs, passing them on to future generations despite the significant impact on their lives, livelihoods, culture and Country.





6.0 ENVIRONMENTAL CONTEXT

The study area is located on the southern bank of the Parramatta River within the Cumberland Plain, across an area of reclaimed land. This portion of Wentworth Point consists of a flat terrain that is subject to flooding. The *Wentworth Point Development Control Plan* (2014) identifies that the study area is contaminated as a result of historic land reclamation. This is confirmed by the overlay on a current aerial image by a 1789 survey map by William Bradley, which shows the study area located within a mudflat (Figure 3).

Land reclamation was undertaken using contaminated fill from the nearby petroleum storage infrastructure (Wentworth Point DCP 2014:15). The approximate extent of the landfill relating to the study area and surrounds is shown in Figure 4. The land reclamation was completed by 1943, as shown in Figure 5.

As the study area consists entirely of land fill, no *in situ* soil deposits, water courses or geological formations are located across the site.



Figure 3: Study area (edged in red) and current aerial map overlaid with a 1789 map of 'Flats at the head of Port Jackson & channel up to Rose Hill' by-W Bradley (Source: SLNSW)





Figure 4: Reclamation of the study area and surrounds highlighted in brown. Study area edged in red (extrapolated from Casey & Lowe 2009:45)



Figure 5: 1943 aerial image of Wentworth point showing the study area as existing landfill, approximate study area location shown edged in red (source: <u>www.sixmaps.com</u>)



Currently, the study area is vacant with cement slabs located across the site from a former industrial use, as shown in Figure 6 below. A large mound, sparse trees and vegetation regrowth as well as introduced gravels are located within the study area. It is understood the mound was constructed to stop floodwaters.



Figure 6: 2009 aerial image of study area shows concrete covering majority of study area, and land being used for industrial purposes (Google Earth)



7.0 ARCHAEOLOGICAL CONTEXT

7.1. Sydney Basin

Many surveys have been undertaken in the Sydney region which indicate the richness of the archaeological resources and provide information about Aboriginal occupation. In particular, Attenbrow (2002) has excavated a range of sites within the Sydney Basin. The aim of her study was to identify local geographic variation and temporal changes in the subsistence patterns and material culture of the people of this area. She excavated sites at Balmoral Beach, Cammeray, Castle Cove, Sugarloaf Point (Lane Cove River), Darling Mills State Forest, Winston Hills, Vaucluse and Cumberland Street in the Rocks. Dates for initial occupation vary from approximately 10,000 years BP at Darling Mills to approximately 450 years BP at Cumberland Street, The Rocks.

The oldest dated occupation for the Sydney region is 30,000 years BP from a site excavated by McDonald at Parramatta. McDonald excavated an area known as the RTA site, located at George Street, Parramatta (McDonald 2005), on an alluvial sand terrace running parallel to the Parramatta River. This site provided a sequence of occupation dating from the late Pleistocene through to the mid-Holocene. Although the site had been heavily impacted by development, the sub-surface deposits revealed an "accumulation of evidence from multiple occupation episodes, no doubt occurring at many different times" (McDonald 2005:147). Radiocarbon dating provided a range of dates indicating continuous occupation of the site. The most important date showed that the alluvial sand terrace was possibly first occupied during the late Pleistocene period, about 30,000 years BP and then showed various phases of occupation (McDonald 2005:107). The earliest date obtained from this site, 30,000 years BP, provides the oldest date for the Sydney Basin (McDonald 2005:4). However, it should be noted that the date was obtained from charcoal in the sieve and not in association with cultural deposits, therefore caution should be exercised when considering this date. The next oldest dated occupation is 15,000 years BP from the Shaws Creek K2 rock shelter on the Nepean River (Kohen 1984; Nanson et al 1987). However, these dates must be considered in association with environmental data related to sea level rises. The Sydney region that we know today was vastly different to the landscape of 15,000-30,000 years ago (Nutley 2006).

The period of maximum glaciation was 15,000–18,000 years BP. Therefore, the date of the K2 rock shelter, Attenbrow's Darling Mills site and McDonald's Pleistocene date, indicate that Aboriginal people lived throughout a period of extreme environmental change. During this period, sea levels were up to 130m below current levels (Nutley 2006:1). About 10,000 years ago as temperatures began rising at the end of the last ice age, the polar ice started melting and sea levels rose. The rising sea levels forced people to abandon coastal sites and move inland, with the result that the oldest coastal sites were inundated. By about 6,000 years ago rising water levels had flooded the coastal plain forming the Sydney landscape that we know today. The vast majority of sites in the Sydney region date to around 5,000 years BP, after sea levels had stabilised. Whilst research into submerged indigenous sites is now being undertaken (Nutley 2006), there are few sites in the Sydney area that are known to date beyond 10,000 years BP. Therefore, research undertaken to date has focused on subsistence patterns and cultural change, e.g. Attenbrow (2003).

Attenbrow's (2002) study of the "Sydney region" extended from the eastern coast to the Hawkesbury-Nepean River to the north and west and as far south as Picton (2002:xiii), which includes the present study area. At the time of publication (2002), Attenbrow noted that approximately 4,340 Aboriginal sites had been registered with OEH's Aboriginal Heritage Information Management System (AHIMS) in the Sydney region (Attenbrow 2002:48). Middens and open campsites comprised just over half of the recorded sites (Attenbrow 2002:48-49). From both the archaeological evidence and historical records, she noted that the main focus of occupation was "on the valley bottoms and shorelines" (Attenbrow 2002:47). In addition, the evidence indicates that occupation was greater on the coastal/estuarine environments rather than in the hinterland/freshwater environments and on the Hawkesbury sandstone areas rather than the Wianamatta shales (Attenbrow 2002:51). Her work produced a great deal of information in respect of the people of the Sydney region, their social organisation and land use patterns. Her (2002:152-155) analyses indicates that prior to 5,000 years ago occupation in the Sydney region was not intensive and was only occupied by small groups of people. It was not until sea levels stabilised about 5,000 years ago that more intensive occupation began with many open sites being first occupied in the last 1,500 years.

On the Cumberland Plain, which falls within Attenbrow's Sydney Region, many surveys have been undertaken in relation to Environmental Impact Statements. As a result of these studies, which were occasioned by the burgeoning urban expansion extending into the Cumberland Plain, the NPWS recognised the need for a coherent study of the area to fully assess the impact of urbanisation on the natural and cultural heritage of the Cumberland Plain. Smith (1989a) was commissioned by the NPWS to undertake an Aboriginal Site Planning Study to be utilised in the management of Aboriginal


sites on the Cumberland Plain. Prior to her study, 307 sites had been recorded on the Cumberland Plain, mainly open artefact scatters (297) with four scarred trees, one carved tree, four axe-grinding grooves and a Mission site (the Blacktown Institute). Smith (1989a:2) added 79 open sites and 29 isolated finds from field surveys related to her study.

Smith's (1989a:3) analysis indicated that site location and site densities were influenced by the availability of water and raw materials. She concluded that other factors such as topography, natural vegetation and soil types did not influence site location. She also identified that the majority of sites recorded have been in the northern sector of the Cumberland Plain, during site surveys of areas threatened by development (Smith 1989a:21). Her field studies (1989a & 1989b:10) confirmed that site densities in the southern Cumberland Plain appear to be lower overall to site densities on the northern Plain.

Since Smith's study, there has been a dramatic increase in development in Western Sydney, resulting in a great deal more archaeological survey and excavation (Comber 1990, 1991, 2006a; McDonald 1989, 2002 & 2005a). This further work has indicated the complexity in the archaeological record of the area that was not previously recognised. For example, sites on permanent water are more complex than sites on ephemeral drainage lines with major confluences being prime site locations. However, McDonald (2005a) reports that archaeological sites are found in a range of landscapes and that their condition is dependent on the amount of impact from European land practices.

McDonald's (2005a) report demonstrates the dynamic nature of stone tool technologies on the Cumberland Plain. She reviewed previous work within a theoretical framework to identify intra and inter-regional variation. She not only identified change over time in the stone tool technology, but the manner in which "stone technologies were organised in relation to landscape" (McDonald 2005a:np). Her report provides a framework to tentatively date sites through technological analyses and to identify cultural changes.

Her study also indicated that the surface representation of a site on the Cumberland Plain does not necessarily reflect the actuality of that site. Of the excavations conducted by her, sub-surface deposits were present even when there was no surface indication of a site. According to McDonald (2005a:5), "despite artefacts being rare or completely absent on the surface at each of the sites investigated, all six sites were found to contain intact archaeological deposit. Almost 500 square metres were excavated during this Project and almost 35,000 artefacts retrieved."

Excavations by Comber (2010) at Penrith confirmed that it was possible for subsurface deposits to exist without any surface artefacts being recorded. She excavated a total of 63 trenches yielding over 2,500 artefacts, in areas where artefacts were not present on the surface (Comber 2010:1).

Comber's excavations at Parramatta (2018 & 2019a&b) and Comber & Stening (2018, 2019 a&b) have confirmed McDonald's hypothesis and that subsurface artefact deposits can be found despite disturbance from ongoing residential and commercial construction.

7.2. Wentworth Point

To date, archaeological investigations within the immediate vicinity of the study area have been limited. This is likely due to the study area being located within reclaimed land and the lack of archaeological potential. Archaeological investigations have been undertaken within areas of natural landscapes in the Homebush and Sydney Olympic Park region, with registered Aboriginal sites located in the wider region.

A search was undertaken of the Aboriginal Heritage Management System (AHIMS) on 03/03/2021. The search revealed 24 registered Aboriginal sites within a 3km radius of the study area. The results of the AHIMS search are detailed in Table 1 below.



Site Type	Frequency	Percent	
Shell, Artefact	7	29.18	
Potential Archaeological Deposit (PAD)	6	25	
Artefact	5	20.84	
Art (Pigment or Engraved)	2	8.34	
Grinding Groove	1	4.16	
Shell	1	4.16	
Modified Tree (Carved or Scarred)	1	4.16	
Restricted	1	4.16	
TOTAL	24	100%	

Table 1: Summary of AHIMS sites in a 3km radius from the study area

Shell and artefact sites and Potential Archaeological Deposits (PADs) are the most represented site type, at 54.18% of the total number of sites. Artefact sites, art sites, a grinding groove, a shell site and a modified tree make up the remainder of the site types. One site, 45-6-3022, is listed as a restricted site. AHIMS was contacted and was able to confirm that this site is not located within or adjacent to the current study area.

Figure 7 below shows the distribution of AHIMS sites around the study area. Note that there are no known sites within the area of land reclamation. Figure 8 shows these sites in relationship to the riverbank in 1789. The sites recorded within subsequent fill, and 1.5km of the study area, are on the northern shore Parramatta River and are either on land (45-6-1961) or at the water's edge (45-6-0534, 45-6-3050). As the study area is located on reclaimed land containing contaminated fill, the potential for any unrecorded Aboriginal sites to be present within the study area is nil.



Figure 7: AHIMS sites in proximity to the study area





Figure 8: AHIMS sites in proximity to the study area and relationship to 1789 waterline

7.3. Study Area

There are no registered Aboriginal sites within the study area and the study area is not an Aboriginal place.

7.4. Site prediction

Prior to reclamation, the study area consisted of extensive mudflats and was subject to regular tidal movements, scouring, and redeposition of silt carried downstream during flooding events. The mudflats would not have been an ideal camping location. Occupation sites, such as camp sites or rock shelters, or other evidence of occupation in the form of scarred trees, would not have been present. The Aboriginal archaeological potential of the study area is therefore nil.





8.0 RESULTS, IMPACT & MITIGATION

8.1. Results

The study area was inspected on 19 January 2021 by Dr Jillian Comber, Veronica Norman, Agata Calabrese, Kadibulla Khan and Chris Jones. The whole of the study area was inspected on foot and covered all exposed areas.

The study area is located at the north eastern end of Wentworth Point, immediately east of Wentworth Point Public School. The site is currently vacant, containing mostly cleared land. A large mound runs through approximately half of the study area. It is understood that this mound was constructed to assist with controlling flooding water (pers com General Assistant Wentworth Point Public School to Chris Jones, Comber Consultants). The remainder of the study area consists of sparse vegetation regrowth, gravel, cement slabs and deteriorating infrastructure including former gates and walls.

No *in situ* soil profiles were identified during the site visit. As the study area is located within an area of reclaimed land there is nil potential for Aboriginal sites or places to be located within the study area. For this reason survey units were not recorded during the inspection.



Photograph 1: View from mound to southern boundary of study area – mound was constructed to reduce flooding to adjacent Wentworth Point Public School



Photograph 2: View north east from mound, showing surrounding landscape



Photograph 3: View north from mound, showing surrounding landscape



Photograph 4: Central portion of study area – concrete, asphalt and introduced gravels





Photograph 5: Central portion of study area – concrete, asphalt and introduced gravels



Photograph 6: Southern boundary of study area – concrete, asphalt, introduced gravels and former entrance gate

8.2. Effective survey coverage

Ground surface visibility (GSV) refers to the amount of bare ground visible during the field survey. The visibility of some site types, such as open artefact scatters, is dependent upon GSV and exposure. Heritage NSW guidelines suggest that this information be presented in a table which quantifies and detail the local detectability (DECCW 2010:19).

As the entire study area is located within reclaimed land, and it has been determined that there is nil potential for Aboriginal archaeological objects or places to be present within the study area, the recommended tables calculating effective survey coverage and GSV have not been used.

8.3. Impacts & mitigation

As the study area is reclaimed land without the potential to contain Aboriginal sites, there will be no impacts to Aboriginal sites and therefore specific mitigation measures are not required.



9.0 SIGNIFICANCE ASSESSMENT

9.1. Preamble

Significance assessment is the process whereby sites or landscapes are assessed to determine their value or importance to the community.

A range of criteria have been developed for assessing the significance which embody the values contained in the Burra Charter. The Burra Charter provides principles and guidelines for the conservation and management of cultural heritage places within Australia.

Following are the criteria which will be used to assess the study area.

9.2. Criteria

Social Value (sometimes termed "Aboriginal" value) which refers to the spiritual, traditional, historical or contemporary associations and attachments which the place or area has for the present-day Aboriginal community.

Historic Value refers to the associations of a place with a person, event, phase or activity of importance to the history of an Aboriginal community.

Scientific Value refers to the importance of a landscape, area, place or object because of its archaeological and/or other technical aspects.

Aesthetic Value refers to the sensory, scenic, architectural and creative aspects of the place.

Representativeness refers to whether the site demonstrates the principal characteristics of that site and is a good representative example of that site type.

Rarity refers to the degree to which such a site is known elsewhere and whether the site is uncommon, rare or endangered.

9.3. Assessment

Social Values

The study area sits within the boundaries of the Wann, and the broader Aboriginal landscape of the Sydney Basin. However, as the study area consists entirely of reclaimed land, it is unlikely that there are social values related to the site. Evidence of Aboriginal occupation is not predicted to be present on site. It should be noted that Aboriginal community consultation is still to be undertaken.

Historic Values

It is unlikely that the mudflats of the area would have been occupied by Aboriginal people prior to land reclamation as they would have been submerged below water.

Scientific Values

The study area does not have the potential to yield further information through detailed scientific and archaeological research as the site is on reclaimed land and the mudflats are unlikely to have been occupied by Aboriginal people. The study area does not have the potential to contain sub-surface archaeological deposits.

Aesthetic Values

The study area does not contain aesthetic values.

Representative Values

The study area does not contain representative values.



Rarity Values

The study area does not contain rarity values.

9.4. Statement of significance

The study area sits within the boundaries of the Wann, and the broader Aboriginal landscape of the Sydney Basin. However, the land on which the study area is located was reclaimed in the 1930s. Prior to this, the study area would have consisted of mudflats that were submerged below water. Due to this, evidence of Aboriginal occupation is not predicted to be present on site. Consultation with representatives of the Aboriginal community has not identified social values or significance related to the site.



10.0 RECOMMENDATIONS

The following recommendations are made on the basis of:

- Legal requirements under the terms of the *National Parks & Wildlife Act 1974* (as amended), which states that it is an offence to harm or desecrate an Aboriginal object without first gaining the consent of the Director-General of Heritage NSW.
- Research into the environmental and archaeological background of the study area and its surroundings, as detailed in this report;
- Results of the site inspection and archaeological assessment as outlined in this report.

IT IS THEREFORE RECOMMENDED THAT:

- 1. Aboriginal community consultation in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* should be undertaken and continue for the remainder of the project, including input into the design principles of the new high school.
- 2. As subsurface Aboriginal objects are not predicted to exist within the study area, no further Aboriginal archaeological assessment is required.



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APPENDIX A: AHIMS SEARCH



NSW	Office of Environment & Heritage AHIMS Web Services (AWS) Extensive search - Site list report								Your Ref/PO Number : WP Client Service ID : 560702		
<u>teID</u> 5-6-2300	<u>SiteName</u> Rivendell 2;Concord West;	Datum 2 AGD	Zone Easting 56 323990		<u>Context</u> Open site	<mark>Site Status</mark> Valid	<u>SiteFeatures</u> Shell : -, Artefact : -	<u>SiteTypes</u> Midden	Reports		
	Contact	Recorders	Michael Guide	4 F			Permits				
-6-2312	Subiaco Ck 1;	AGD	56 319790	6256890	Open site	Valid	Artefact : -	Open Camp Site	102196		
	Contact	Recorders	Michael Guide	r			Permits				
5-6-0534	Charity Point;Meadowbank Park;	GDA	56 322909		Open site	Valid	Shell : -, Artefact : 14	Midden,Open Camp Site	1308,2047,102 196,102489		
	Contact	Recorders	Val Attenbrow	,Elizabeth Rich,L	aura-Jane Smith,M	liss.Lisa Smith,Abor	iginal Heritage Permits				
5-6-1894	Rivendell;	AGD	56 323800		Open site	Valid	Art (Pigment or Engraved) : -	Rock Engraving			
	Contact	Recorders	Rivendell Scho				Permits		100.000		
5-6-2557	Waterview Street - RYDE 205	GDA	56 323984		Open site	Valid	Shell : -, Artefact : -	Midden	102489		
	Contact	Recorders		er,Aboriginal Heri			Permits				
5-6-2324	Yaralla Bay;Concord West Hospital;	AGD	56 323870		Open site	Valid	Artefact : -, Shell : -	Midden			
	Contact	Recorders					Permits				
5-6-2032	Bennelong park; RYDE 206	GDA	56 324369		Open site	Valid	Shell : -, Artefact : -	Midden	102489		
	Contact	Recorders		er,Aboriginal Heri			Permits				
5-6-1937	Rocky Point;Concord West;	AGD	56 323910		Open site	Valid	Artefact : -, Shell : -	Midden,Open Camp Site			
5-6-1961	Contact	Recorders AGD	Michael Guider 56 321030		Oran cita	Valid	Permits Shell : -, Artefact : -	Midden	102196		
2-0-1201	Ermington 1;				Open site	valid		Midden	102196		
5-6-0031	Contact Puda Puda Paidan: PVDE 204	Recorders GDA	Michael Guide 56 323754		Or an aite	Valid	Permits	D - als Engenning	102489		
5-6-0031	Ryde;Ryde Bridge; RYDE 204	GDA Recorders		6255920 er,Aboriginal Heri	Open site	Vand	Art (Pigment or Engraved) : - Permits	Rock Engraving	102489		
5-6-2636	Ermington PAD	AGD	56 320000		Open site	Not a Site	Potential		102142,10219		
	Liningson r ite		<i></i>		open site		Archaeological Deposit (PAD) : -		6		
	Contact	Recorders		onsulting Archaeo			Permits	1365			
5-6-2677	Kissing Point Park - RYDE 207	GDA	56 324324		Open site	Valid	Artefact : 8		102142,10248 9		
5-6-2682	Contact	Recorders AGD	Michael Guide 56 321152	er,Aboriginal Heri 6254826		Not a Site	Permits Modified Tree				
5-6-2082	Wanngal Woodland Axe-Marked Tree	AGD	56 321192	0234826	Open site	NOT a Site	(Carved or Scarred) :				
		Recorders	Paul Irish Con	sultant Archaeolo	ogist		Permits				
	Contact		56 321154	6254823	Open site	Valid	Potential		102142,10219		

Page 1 of 2

	1

NSW	AHIMS Web Ser AHIMS web Ser Extensive search - Si									Your Ref/PO Number : WF Client Service ID : 560702
SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
	Contact	Recorders	Paul	Irish Consul	tant Archaeolo	gist		Permits		
45-6-2684	Wanngal Woodland IF2	AGD	56	321386	6255227	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102142,10219 6
	Contact	Recorders	Paul	Irish Consul	tant Archaeolo	gist		Permits		
45-6-2685	Wanngal Woodland IF3	AGD		321319	6255192	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102142,10219 6
	Contact	Recorders			tant Archaeolo	0		Permits		
45-6-2785	Wanngal Woodland PAD2	GDA		321185	6254699	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		102196
	Contact T Russell	Recorders		aul Irish				Permits		
45-6-2786	Wanngal Woodland PAD1	GDA Recorders		320840 aul Irish	6254603	Open site	Valid	Potential Archaeological Deposit (PAD) : 1 Permits		102196
45-6-2864	George Kendall Ermington	AGD		321020	6255857	Open site	Valid	Shell : -		
	Contact	Recorders		hris Ingrey		opensite		Permits		
45-6-3022	Restriction applied. Please contact ahims@environment.nsw.gov.au.					Open site	Valid			
15 4 3050	Contact	Recorders		iginal Herita				Permits		
45-6-3050	Charity Point 2 - Ryde 202	GDA		322924	6256250	Open site	Valid	Artefact : 14		
	Contact	Recorders		iginal Herita	•			Permits		
45-6-3039	Meadowbank Park Tennis Courts RYDE 203	GDA		322539	6256690	Open site	Valid	Grinding Groove : 3		
	Contact	Recorders		iginal Herita				Permits		
45-6-3746	20Waterview St_ISF1	GDA		324218	6255521	Open site	Valid	Artefact : -		104349
	Contact	Recorders					s.Sam Cooling,Miss.S		4643	
45-6-3849	20Waterview Street_TU8	GDA	56	324244	6255463	Open site	Valid	Artefact : -		
	Contact	Recorders	Curio	Projects Pt	y Ltd,Miss.Sam	Cooling		Permits		

Report generated by AHIMS Web Service on 12/01/2021 for Agata Calabrese for the following area at Lat, Long From : -33.8384, 151.0538 - Lat, Long To : -33.8069, 151.1064 with a Buffer of 50 meters. Additional Info : Archaeological assessment. Number of Aboriginal sites and Aboriginal objects found is 24

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

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