

Eastern Creek Business Hub Archaeological Management Plan

Final

Prepared for Western Sydney Parklands Trust

10 February 2016

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Glossary

ACHA	Aboriginal Cultural Heritage Assessment
AHMS	Archaeological and Heritage Management Solutions
CBD	Central Business District
CHL	Commonwealth Heritage List
DoE	Department of the Environment
DSEWPaC	Department of Sustainability, Environment, Water, Population and Communities
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i>
GBA	Graham Brooks and Associates
IDA	Integrated Development Assessment
LEP	Local Environment Plan
NHL	National Heritage List
DSEWPaC	Department of Sustainability, Environment, Water, Population and Communities
NSW	New South Wales
OEH	NSW Office of Environment and Heritage
PAD	Potential archaeological deposit
SoHI	Statement of Heritage Impact

1 Introduction

1.1 Project background

Biosis has been commissioned by Western Sydney Parklands Trust to produce an Archaeological Management Plan (AMP) in order to meet the Minister of Planning and Infrastructures development consent requirements for the State Significant Development (SSD); 5175 Eastern Creek Business Hub development application, Rooty Hill Road, City of Blacktown LGA, NSW.

This AMP forms part of the Construction Environmental Management Plan (CEMP) for the SSD. The CEMP shall include details sufficient to understand and avoid, mitigate and remedy all potential environmental impacts of the project during construction.

1.2 Background

On the 11 September 2012 a staged SSD Application was made under Part 4 Divisions 4.1 of the Environmental Planning and Assessment Act 1979. The application included the proposal for the construction of a development structure for the Eastern Creek Business Hub, which included the sites layout, activities, building envelopes and design guidelines.

A modification to this application was made on the 24 August 2015 which proposed to incorporate greater flexibility between GFA limits, make amendments to the Structure Plans to enable the transfer of Beggs Rd easement into the business hub, a reconfiguration of the Stage 1 stormwater drainage system, additional bulk earthworks as part of the Stage 1 early works and amendments to the Stage 1 consent to reflect the updated Stage 1 site remediation work post determination.

1.3 Location of the Project Area

The Project Area is located within the City of Blacktown, Parish of Rooty Hill, County of Cumberland and within the Blacktown LGA. It is bounded by the M7 Westlink Orbital Motorway to the east, the Rooty Hill Road to the west, the Great Western Highway to the south and Church Street to the north.

The majority of the Project Area is vacant, open grassland with an area south of Church Street utilised for horse grazing. A total of five houses are located within the Project Area. One fronting onto Rooty Hill Road South and another onto Church Street. Infrastructure for the Jemena Gas Pipeline also follows the approximate alignment of the former Belmore Road (see Figure 1).

1.4 Previous heritage assessments

Kayandel Archaeological Services (Kayandel) carried out a brief preliminary assessment of the Project Area in August 2009, identifying seven potential archaeological deposits (PAD). A subsequent recommendation was that a sub-surface testing program should commence at PAD 2 – 7 (2009).

The subsequent 2015 Development Consent from the Minister of Planning however, did not recommend test excavation and only stipulated that,

'In the event that surface disturbance identifies a new Aboriginal object, all works must halt...'

Biosis reviewed the location of the recorded PADs during a responses to submission report and it was noted that a number of PADs were placed within, or in extremely close proximity to, areas marked as having 'heavy' disturbance. This negates the original prediction that PADs would be located in areas of 'low'

disturbance. Likewise, a number of roads and buildings were mapped within the original mapping as areas of "low" disturbance. The review has questioned the original placement of the PADs.

Biosis also undertook a site visit of the Project Area on the 2 December 2015. The aim of the site visit was to investigate the areas highlighted as PADs and assess the disturbance. Biosis has consequently amended the previous disturbance mapping and determined no further archaeological work is required (see Figure 1).

Graham Brooks and Associates (GBAA) (2012) SoHI report also determined that no part of the proposed development site is listed as an item of heritage significance in any statutory instrument. The proposed development is physically separated from the only heritage items within the area and the only potential impact will be limited to that of views (GBA, 2012).

In 2012 AHMS undertook a subsequent baseline historical assessment of the Project Area to assess whether any historical archaeological resources may be present. This assessment noted that there is potential for physical remains of historical occupation to exist within two areas within the Project Area. The first was the former school, Henry Beggs residence, the Lukes's saw mill / John Beggs house within the southern portion; and the remains of twentieth century developments such as poultry sheds and inter-war period residences within the northern portion.

The subsequent 2015 Development Consent from the Minister of Planning made the condition (B23) which states,

"Prior to the commencement of any works a Historical Archaeological Management Plan prepared by a suitably qualified person shall be submitted ... The plan shall assess the monitoring and management of potential remains of the school and the Begg family homes include Bee Hive Wells in the vicinity of The Great Western Highway.."

1.5 AMP aims

The objectives of this AMP are to:

- Review and consolidate information associated Aboriginal and Historical heritage locations
- Outline conditions of approvals for the proposed works
- Provide an overview of impact to heritage within the Project Area
- Detail the monitoring methodology
- Present contingency plans for the unexpected discovery of Aboriginal objects, sites and human remains
- Present contingency plans for the unexpected discovery of historical relics and sites

1.6 Method

This AMP has been prepared in accordance with the Australia ICOMOS Burra Charter 1999, James Semple Kerr's *The Conservation Plan* (2000) and Guidelines provided by the NSW Heritage Office. The Heritage Office Model Brief, and suggested table of contents for a AMP, have been employed as the basis for the structure of the AMP.

The Australia ICOMOS Charter for the Conservation of Places of Cultural Significance (Burra Charter 1999), provides a framework for which heritage management in Australia is considered. The overarching guidelines are:

2.1 Places of cultural significance should be conserved

2.2 The aim of conservation is to retain the cultural significance of a place

2.3 Conservations is an integral part of good management of places of cultural significance

2.4 Places of cultural significance should be safeguarded and not put at risk or left in a vulnerable state.

Good management of sites with heritage significance requires an understanding of how to best apply of the *Burra Charter* principles to a site. An operational site with its own set of particular needs can be complex if not managed practically, as is the case with the current site.

1.1 Authorship

The AMP has been prepared by Shannon Smith and Alexander Beben of Biosis. It is based on previous heritage assessments undertaken for Western Sydney Parklands Trust.

1.2 Distribution

The finalised AMP will be distributed to:

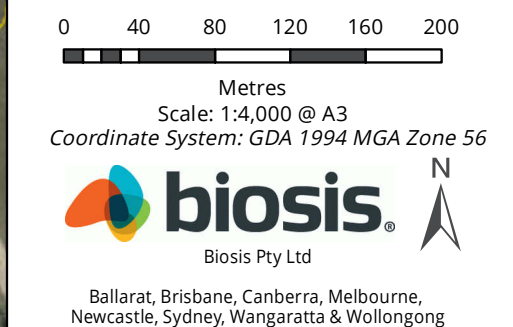
- Department of Planning and Infrastructure (DoPI)
- OEH
- All Registered Aboriginal Parties (RAPs)



Legend

- Project area
 - Monitoring area
 - Potential Aboriginal Deposits
- Disturbance
- High
 - Medium
 - Low

Figure 1: Location of the Project Area including Potential Aboriginal Deposits and areas of disturbance



Matter: 21409
 Date: 19 January 2016
 Checked by: SS, Drawn by: JMS, Last edited by: jshepherd
 Location: P:\21400s\21409\Mapping\21409 Disturbance and PADs

2 Conditions of approval

Project Approval was granted by the Minister for Planning and Infrastructure on 7 January 2015 under Part 89E of the EP&A Act 1979. Conditions relating to heritage are summarised within Table 1.

Table 1 Minister of Planning and Infrastructure development consent conditions

Condition no.	Condition requirement	Management
Part B – Prior to commencement of works.		
B23	Prior to the commencement of any works a Historical Archaeological Management Plan prepared by a suitably qualified person shall be submitted to the Certifying Authority. The plan shall address the monitoring and management of potential remains of the school and the Begg family homes including Bee Hive Wells in the vicinity of The Great Western Highway.	Archaeological monitoring program set out in this AMP.
Part C – During construction.		
C12	Archaeological monitoring in accordance with the Archaeological Management Plan is to be carried out in relation to all ground works in areas of high or moderate archaeological potential as outlined in the Historical Archaeological Management Plan. If any archaeological relics are uncovered during the course of the work, then all works shall cease immediately in that area and the OEH Heritage Branch is to be contacted, depending on the possible significance of the relics, an archaeological assessment and an excavation permit under the NSW Heritage Act 1977 may be required before further works can continue in that area.	Archaeological monitoring program set out in Section 4. Contingency plan set out in Section 5.
C13	In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impact to the object(s). A suitably qualified archaeologist and a registered Aboriginal representative must be contacted to determine the significance of the object(s). The site is to be registered in the Aboriginal Heritage Information Management System (AHIMS), which is managed by OEH and the management outcome from the site include in the information provided to AHIMS. The applicant must consult with the Aboriginal community representatives, the archaeologist and the OEH to develop and implement management strategies for all objects/sites. Aboriginal heritage Management is to be carried out in accordance with an AHIP applicable to the site.	

3 Impact assessment

This section summarises the impact assessment and management options (see Table 2). There will be no impacts to any Aboriginal heritage sites from the proposed works, so they have not been discussed further.

Table 2: Impact assessment and management options

Historical potential area	Feature	Feature description	Source	Management requirements
Public school precinct	1	The large public school building	In January 1872 the construction of the Wallgrove Public School commenced. This structure was also noted on the 1917 auction plan. It was then noted in the 1943 aerial photo. It had been demolished by 1956.	<p>The assessment has determined that there is the potential for unrecorded archaeological relics, which are likely to have local significance if encountered.</p> <p>All excavation works associated with the proposed development in these areas should be monitored using the archeological method statement outlined in Section 4.</p> <p>This will ensure that any impacts to archaeological "relics" considered to be significant at a state or local level are mitigated.</p>
	2	The smaller public school structure	Was noted on the 1943 aerial photo and was still standing in the 1971 aerial photo. This structure has since been demolished.	
	3	Smaller ancillary building	They were noted on the 1943 aerial photo and were still standing in the 1971 aerial photo. These structures have since been demolished.	
	4			
	5			
Mr. Beggs allotment	6	Mr. Beggs residence	On 13 May 1871 a majority of the Project Area was sold at the third public auction to John Beggs and the 1917 auction plan shows a structure named 'Mr. Beggs structure'. The structure is seen in the 1943 aerial, before being demolished before 1971.	
	7	Possible saw mill / or sheds	The 1917 auction plan shows a structure at this location. The structure is seen in the 1943 aerial, before being demolished before 1971.	

Historical potential area	Feature	Feature description	Source	Management requirements
Bee Hive Well	8	Circular brick feature	A bee hive well has been recorded in the area	

4 Monitoring methodology and reporting

This research design describes the methodology to be used for the archaeological monitoring and, if required, subsequent expansion and monitoring tasks.

4.1 Monitoring timeframes

Areas of high and medium archaeological potential within the Project Area are to be subject to a program of monitoring as part of the on-site demolition works and initial bulk excavation of the site.

Should intact archaeological remains be identified, the excavation and recording techniques detailed in the section below will be undertaken. It is intended to excavate the areas to a maximum depth of 1.2 metres, however this may need to be revised in the event that deep archaeological structures or deposits are encountered. Should substantial archaeological remains be located the excavations will cease once the nature of the structural and depositional archaeological remains has been established.

4.2 Premises of investigation

There are three premises that underlie the strategy outlined in this section for a program of excavations:

- The monitoring program is designed to locate specific archaeological sites that have been identified; the objective of the work is to determine the extent to which archaeological remains are still present within the Project Area and how these will be impacted upon by the proposed development.
- If intact archaeological features or deposits are revealed within any monitoring area then sufficient work will be undertaken to determine as far as possible their likely context or association and date.
- Once the nature, extent and significance of archaeological remains within the Project Area have been established, the viability and necessity of salvaging of archaeological remains can be considered. Should archaeological remains be encountered which require salvage, this will be undertaken in accordance with the methodology presented in this research design.

4.3 Research questions

The purpose of the research design is to clearly articulate the anticipated outcomes from a program of work; what questions we are asking of the program and how the work will be undertaken to address these questions. Several questions are proposed as the operating framework. These are:

- To what extent does the Project Area contain archaeological remains relating to the early nineteenth to mid twentieth century public school? Are sufficient archaeological profiles present so as to establish dates or specific associations for archaeological evidence revealed to it?
- To what extent does the Project Area contain archaeological remains relating to the early nineteenth to mid twentieth century farming residence of Mr. Beggs? Are sufficient archaeological profiles present so as to establish dates or specific associations for archaeological evidence revealed to it?
- To what extent does the Project Area contain archaeological remains relating to the "possible saw mill". If identified can the remains help identify the purpose of this structure?

- Is it possible to identify a separation between "private" and "communal" spaces within the Public School precinct? It was noted that a residence was attached to the public school, can these areas be seen in the archaeological record?
- If relics are located from both the Mr.Begg's residence and that public school residence, can difference be seen in their economic and social standing? Where lifestyles similar within the commercial farming and education industries within the close and small community in the early nineteenth century?
- If present, what can depositional remains from the Project Area site tell us about the lifestyles and economy of people who lived in and frequented the residential dwellings? What variation is there from one dwelling to another?
- If present, what can the archaeological evidence tell us about the social and economic conditions within Blacktown from 1871 onwards?

4.4 Monitoring areas

Monitoring areas

The purpose of this stage of the methodology is to establish the monitoring area within the development impact area. The archeological monitoring will occur within three areas, the justification for these areas and their positioning is as follows:

- **Monitoring Area 1** is located within the Public School Precinct and encompasses the nineteenth century Public School structure (Feature 1, 2, 3, 4 and 5). This monitoring area has been positioned to capture any remaining archaeological remains associated with this structure as well as any buildings or archaeological features which have not been detected through the historical research undertaken as part of the preparation of this document. Archaeological features identified by this monitoring area are likely to be primarily structural in nature; however dense archaeological deposits may be associated with any wells, privies or refuse pits which may be identified (see Figure 2).
- **Monitoring Area 2** is located within the Mr.Beggs allotment and encompasses the Mr. Beggs structure (Feature 6). The excavation area has been positioned to capture any remaining archaeological remains associated with this structure as well as any buildings or archaeological features which have not been detected through the historical research undertaken as part of the preparation of this document. Archaeological features identified by this excavation area are likely to be primarily structural in nature; however dense archaeological deposits may be associated with any wells, privies or refuse pits which may be identified (see Figure 3).
- **Monitoring Area 2** is located also within the Mr.Beggs allotment and encompasses the 'possible saw mill' (Feature 7). The excavation area has been positioned to capture any remaining archaeological remains associated with this structure as well as any buildings or archaeological features which have not been detected through the historical research undertaken as part of the preparation of this document. Archaeological features identified by this excavation area are likely to be primarily structural in nature. (see Figure 3).

Expansion of excavation areas

Based upon the results of the monitoring it might be determined necessary to expand the excavation areas to encompass all or part of the site. This may require an additional research design.

For example, it may be necessary to widen the excavation areas to allow these archaeological features to be fully investigated and recorded. In the event that expansion of the excavation areas is warranted, this will be undertaken to reveal the extent of all archaeological remains subject to investigation.

Excavation will be undertaken through a combination of machine excavation and conventional manual archaeological techniques. Should intact archaeological structures or deposits be exposed then machine excavation will cease and the archaeological material will be investigated by the conventional manual techniques under the direction of the nominated excavation director.

Areas of low archaeological potential

Monitoring is not proposed for areas of low archaeological potential. The historical context has identified that there is a long, established history of occupation. It is possible that there are phases of occupation which may not be readily identifiable in the documentary record and/or discrepancies in the extent of disturbances which may result in intact archaeological remains being present.

Excavation and recording techniques

Excavation would be undertaken using open area techniques with the aim of removing each stratigraphic layer (or context) in the order in which it was deposited (Barker, 1983). All areas investigated as part of the excavations will conform to the following methodology:

- Should identifiable modern fills be encountered during excavations these deposits will be machine excavated until occupational or natural depositional horizons are encountered, this stage of excavation will be conducted by the Excavation Director. All machine excavation from this point forward will use a smooth edged mud bucket to scrape back the deposits which cap the archaeologically significant structural and depositional remains.
- Following the initial period of monitored machine excavation the site will be evaluated by the Excavation Director. The location of some of the excavation areas may have to be adjusted should the areas located prove to be unsuitable (i.e. unexpected services, heavy disturbance, dangerous materials etc.).
- Excavation will be conducted in stratigraphic sequence; the reduction of all occupational/natural deposits will be by stratigraphic unit. This will be undertaken using either machine or hand excavation.
- Each area will be excavated until natural deposits are encountered, or significant in situ structural or depositional remains prevent further excavation, or where it is determined that further excavation will not yield beneficial diagnostic information.
- Artefacts would be collected and bagged with reference to their stratigraphic location.

The following recording system is based upon that described in the first Port Arthur Manual (Davies and Buckley 1987) and will employ the following recording mechanisms:

- Excavation locations will be recorded with a GPS. A site grid will be established and surveying techniques for establishing the location of remains and artefacts identified will be undertaken.

- A Survey control for the site would be established, including main and subsidiary datums, a grid system tied to the Map Grid of Australia and the development grid, as well as the cadastre. Further datums for vertical control will be established to allow all areas to be surveyed in to a nearby point. These will be tied back to Australian Height Datum.
- Detailed archaeological scale plans and sections of the site and individual features. Archaeological features would be recorded through the preparation of plan and sections. Structural elements such as brick walls and timber posts would be recorded in situ to observe phases in construction and removed in stratigraphic sequence.
- Rubble fill will only be recorded only where it provides specific information regarding masonry and construction (i.e. wall finishes, material etc.).
- A comprehensive digital photographic record (following the Photographic recording of Heritage Items using Film or Digital capture (NSW Heritage Branch 2001, revised 2004, 2006).
- The stratigraphic relationships between contexts would be described through the compilation of a Harris Matrix (Harris, 1989).
- Analysis of fabric and detailed recording of the remains on context sheets according to best practice standards.

Because of the site history, it is not expected that hazardous material such as friable asbestos cement will be encountered but if such material is encountered the archaeological work would be guided by Work Cover Occupational Health & Safety guidelines for dealing with such material. We do not propose to retain any hazardous materials.

Contingency for Excavation at Depth in the event a well is encountered:

- Due to the potential for a well to be present within the Project Area contingencies for excavation at depth have been considered as part of this methodology. This will be completed through systematically reducing the well in appropriate increments by machine and hand. Given the depth of the potential archaeological resource, stepping of excavation areas may be required. If stepping of an excavation is undertaken, this will only occur after all archaeological remains have been investigated, recorded and removed.
- In the event of evidence of occupation occurring near the 1.2 metre depth cut off for safe excavation, it will be necessary to step or shore the pits to provide a safe work environment.
- The exact nature of the extent and the depth of that expansion will be dependent on the ground characteristics and stability during excavation. Relevant NSW Work Cover excavation guidelines will be used to guide any excavation, stepping and shoring of deposits at depth.
- Where safe work practices differ from the excavation permit methodology, safe work practice and a safe work environment will be take precedence over any archaeological considerations.
- At depth certain excavation areas may be considered to be a confined space under the NSW Occupational Health and Safety Act 2000. Should any areas be identified as constituting a confined space then these will only be excavated by members of staff with appropriate training.

Protocol for finds and conservation

Any artefacts recovered from the excavation will be recorded as inclusions in specific contexts. The artefacts will be retrieved from the site, stored in labeled context boxes and will be analysed within three months of the completion of the excavation. The latter will include cleaning, cataloguing and photography where appropriate. The information will be included in the analysis of the results of this excavation. The artefacts will be lodged with the local historical society or local Museum depending on the significance and conservation requirements of the artefacts encountered.

During field work

A simple computerised archaeological database will be used as the cataloguing and inventory software for artefacts. Primary artefact processing [sort into fabric / wash, brush or other cleaning / raw counts / labelled bagging / data entry] is to be undertaken as part of the field program. This will necessitate an artefact processing 'lab' being set up in the field. As far as possible, artefact cleaning and cataloguing will occur on site during the excavation. The cataloguing will be a simple catalogue of material by type and context.

The collection as a whole would then be evaluated in connection with the results of the excavation to develop a plan for further artefact analysis. This will allow the artefact analysis to focus on artefacts from relevant stratigraphic contexts.

Post-excavation analysis

Specific artefact processing routines are to be developed for all artefact types. As an example, glass will be primarily sorted by colour into black cylindrical / black case / olive – green tint / clear / etc. The next stage of sorting will be minimum number of individual [MNI] counts for defined aggregates of stratigraphic units. Specialist analyses will then be undertaken on classes of material [fabric type or artefact function], with all data being added to the database.

Authoritative and experienced analysts will be sought to undertake typological and descriptive work if available, or to peer review the analysis. Provision will also be made for students and researchers to catalogue parts of the collection under supervision.

Assemblages from each element will be described in terms of their quantity, representation of different fabric and forms and other broad descriptive characteristics. More importantly, the assemblages will be interpreted according to possible functional evidence of how people lived and interacted with each other. This form of analysis is qualitative rather than quantitative, relying upon interpreting how artefacts are used in their social context.

Collection Management policy

Artefact material recovered will be analysed in response to what is recovered and the research questions posed earlier. Different retention methods and processing depending on its information potential will be undertaken. These will be decided once the excavation works have clarified the situation regarding artefacts.

A materials conservator will be engaged to assist in preparing artefact processing and storage protocols and for advice on recovery of delicate remains. Hazardous materials will be recorded by photographs and discarded appropriately. Building materials will be recorded photographically and catalogued and a small sample of items kept for further analysis and the remaining items discarded.

Once the scope of the artefact collection is established, a further discard policy will be developed in consultation with the Heritage Branch, Department of Planning identifying what materials are to be

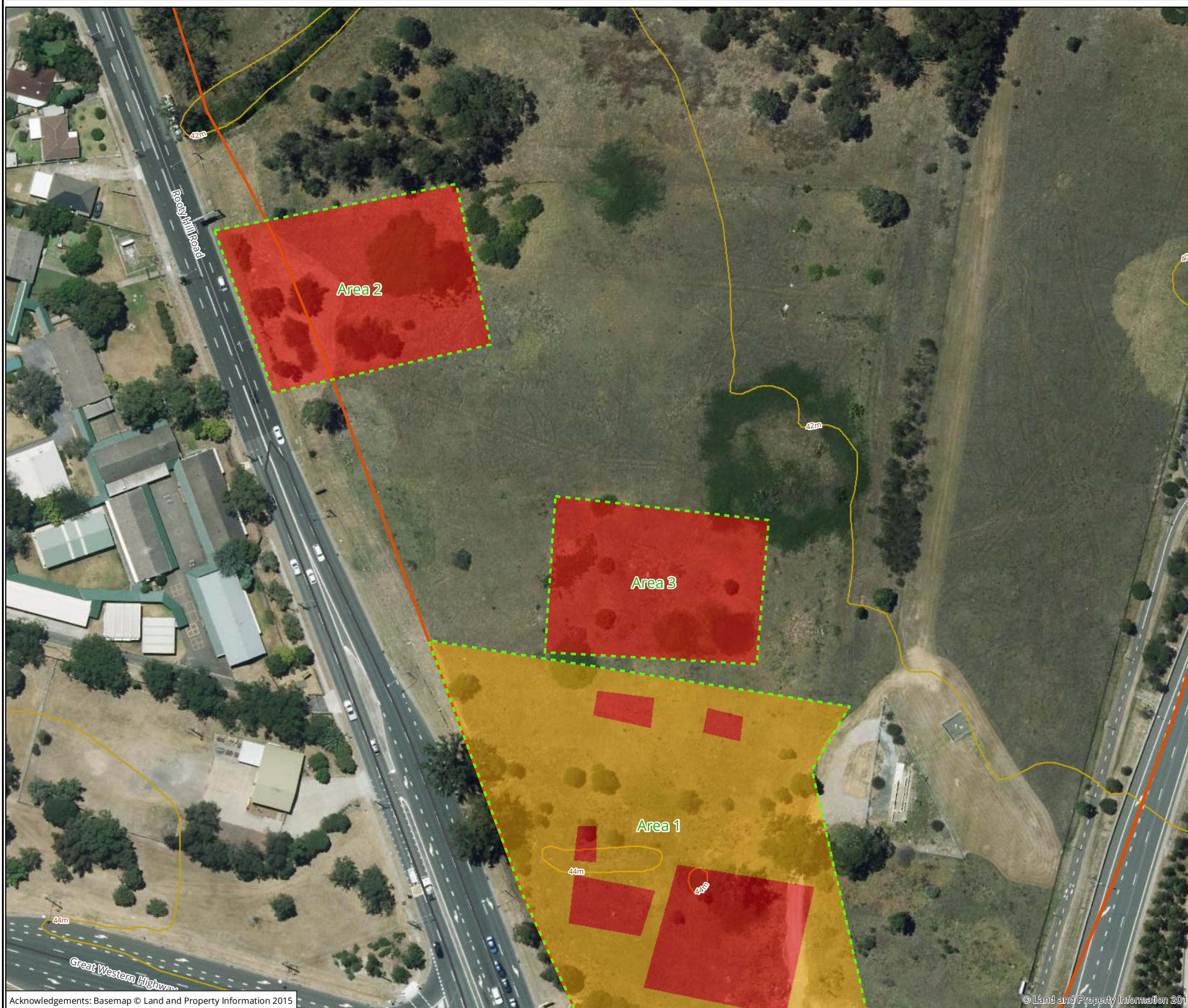
discarded, retained only as samples, retained for long-term storage and retained for possible display. Following confirmation of the policy, the collection will be culled and the remainder prepared for long-term storage. The Applicant will negotiate with relevant heritage groups to establish the preferred recipient of the permanent artefact collection regarding storage, conservation, curation and display of the collection.

4.5 Reporting

A report which complies with the requirements of the NSW Heritage Division should be created. Dependant on the findings of the excavation, the final archaeological report will include the following points:

- The compiled results of areas investigated and contexts or units encountered.
- A stratigraphic matrix and discussion of the sites phasing.
- GIS and CAD mapping where appropriate to illustrate the findings.
- A detailed description of the excavation results including discussion on phasing and possible land use.
- An artefact catalogue compiled on a commercially available computer database designed to reflect the research questions.
- A functional analysis of artefacts uncovered with reference to their provenance and pertinence to research questions.
- A synthesis of results to allow for comparison to other sites.
- Additional historical research to aid understanding of the archaeological evidence.
- A detailed interpretation of the results and addressing of the research questions.
- Illustration of significant artefacts in drawn or photographic form, and a photographic archive of excavation in progress.

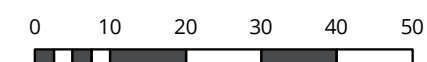
Copies of the excavation report should be lodged at appropriate research libraries and with the Heritage Division.



Legend

- Project area
- Monitoring area
- Historical potential
 - High
 - Medium

Figure 2: Monitoring Area 1



Metres
Scale: 1:1,000 @ A3
Coordinate System: GDA 1994 MGA Zone 56



Ballarat, Brisbane, Canberra, Melbourne,
Newcastle, Sydney, Wangaratta & Wollongong

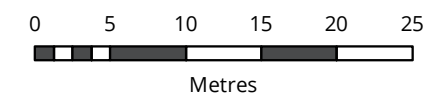
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Legend

- Project area
- Monitoring area
- Historical potential
 - High
 - Medium

Figure 3: Monitoring Area 2 and 3



Scale: 1:500 @ A3
Coordinate System: GDA 1994 MGA Zone 56



Ballarat, Brisbane, Canberra, Melbourne,
Newcastle, Sydney, Wangaratta & Wollongong

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5 Contingency plans

The following contingencies will be undertaken in the case of unanticipated finds or impacts to heritage sites.

5.1 Discovery of unanticipated Aboriginal objects

All Aboriginal places and objects are protected under the NPW Act. This protection extends to Aboriginal objects and places that have not been identified but might be unearthed during construction. The following contingency plan describes the actions that will be taken in instances where Aboriginal cultural material is discovered. Any such discovery in the study area will follow these steps.

- **Discovery:** Should unanticipated Aboriginal cultural material be identified during any surface works, works will cease in the vicinity of the find.
- **Notification:** DoPI and OEH will be notified of the find and the ICHPL Corrective Action Procedure will be initiated.
- **Management:** In consultation with the OEH, RAPs and a qualified archaeologist, a management strategy will be developed to manage the identified Aboriginal cultural material.
- **Recording:** The find will be recorded in accordance with the requirements of the NPW Act and OEH guidelines.

5.2 Discovery of unanticipated historical relics

Relics are historical archaeological resources of local or State significance and are protected in NSW under the *Heritage Act 1977*. Should unanticipated relics be discovered during the course of the project, work in the vicinity must cease and an archaeologist must be engaged to make a preliminary assessment of the find. The Heritage Council and Councils as relevant, will require notification if the find is assessed as a relic and a management strategy should be developed to manage the find.

5.3 Discovery of unanticipated human remains

The following contingency plan describes the actions that will be taken in instances where human remains or suspected human remains are discovered. Any such discovery in the Project Area will follow these steps.

1. **Discovery:** If suspected human remains are discovered all activity in the vicinity of the human remains must stop to ensure minimal damage is caused to the remains. The remains must be left in place, and protected from harm or damage.
2. **Notification:** Once suspected human remains have been found, the Coroners Office and the NSW Police must be notified immediately. Following this, DoPI, OEH and RAPs will be notified.
3. **Management:** If the human remains are of Aboriginal ancestral origin an appropriate management strategy will be developed in consultation with RAPs and the OEH. If the human remains are identified as historical relics then an appropriate management strategy will be developed in accordance with the NSW Heritage Council *Skeletal Remains Guidelines* and OEH. If the exhumation of human remains is subsequently required, these works must be undertaken in accordance with *Public Health Act 1991* exhumation guidelines and relevant heritage guidelines.
4. **Recording:** The find will be recorded in accordance with the requirements of the NPW Act, *Heritage Act 1977*, *Public Health Act 1991* and OEH guidelines as appropriate.

6 Incidents, complaints and non-conformance

6.1 Incident management and non-conformance reporting

An incident can be defined as a set of circumstances that causes or threatens to cause material harm to the environment. Incidents should be managed through established procedures as detailed within the Construction Environmental Management Plan (CEMP).

If an incident occurs that results in actual or potential impacts on known heritage items and/or archaeological items that are discovered unexpectedly, the relevant government agencies will be notified as documented in Section 5 of the AMP.

A detailed report of the incident should be provided to Dop&I within 7 days of the incident occurring.

6.2 Complaints handling

Complaints will be managed through established procedures as detailed in the CEMP.

6.3 Non-conformance protocol

Compliance with all approvals, plans and procedures will be the responsibility of all personnel employed on or in association with the Project. A compliance register should be established to monitor compliance against development consent criteria.

7 Plan administration

7.1 Roles and responsibilities

Environment management is regarded as part of the responsibilities of all personnel working on the Project. A suitably qualified person should be responsible for the archaeological monitoring. They will provide written confirmation at the start and end of the monitoring program detailed in Section 4 of this AMP. A monitoring report will also be provided which summarise the results and will contain the information detailed in Section 4.7 of this AMP.

7.2 Training

All employees, contractors and associated subcontractors working on site will undergo site induction training relating to Aboriginal and non-Aboriginal heritage management issues. The induction training will address elements related to heritage management including:

- Requirements of this CHMP
- Relevant legislation
- Roles and responsibilities for heritage management
- Location of identified heritage sites
- Basic identification skills for Aboriginal and non-Aboriginal artefacts and human remains
- Procedure to follow in the event of an unexpected heritage item find during construction works
- Procedure to follow in the event of discovery of human remains during construction works
- Penalties and non-compliance with this AMP

Training records for all project personnel will be kept and maintained in a register detailing names, dates, content and type of training undertaken. This AMP should be kept on site at all times and be readily accessible.

7.3 Record keeping

All records relating to the CEMP should be stored so that they are readily retrievable and suitably protected from deterioration or loss.

7.4 Review

The processes described in this AMP may result in the need to update or revise this it. This will occur as needed. A copy of the updated AMP and changes will be distributed to all relevant stakeholders and government organisations.

References

- AHMS, 2013. Eastern Creek Business Hub State Significant Development – Response to Submissions. Archaeological & Heritage Management Solutions View at https://majorprojects.affinitylive.com/public/430a25e792ff80d65ecd94c19e10327d/2014-04-23%20Appendix%2015_ECBH%20Archaeological%20response%20AHMS%20table%203_.pdf on 10 December 2015.
- GBA, 2012. Western Sydney Parklands Eastern Creek Business Hub Statement of Heritage Impact. Graham Brooks and Associates. Report prepared for Western Sydney Parklands Trust.
- Harris, E. 1989. *Principles of Archaeological Stratigraphy (Second Edition)*. Academic Press: London.
- Kass T. 2005. Western Sydney Thematic History: State Heritage Register Project (NSW Heritage Office: Parramatta).
- Kayandal Archaeological Services, 2012. Proposed Eastern Creek Business Hub Western Sydney Parklands Rooty Hill Road South, City of Blacktown LGA, NSW. Report prepared for Western Sydney Parklands Trust.