

8 December 2017

**Tanner Kibble Denton Architects Pty Ltd**

Level 1, 19 Foster Street  
Surry Hills, NSW 2010

Attn: **Alex Kibble (Managing Director / Principal)**

**Re: Alexandria Park Community School, 7-11 Park Road, Alexandria: Aboriginal Heritage Due Diligence Assessment.**

Dear Mr Kibble,

Extent Heritage was commissioned by Tanner Kibble Denton Architects Pty Ltd to undertake an Aboriginal heritage due diligence assessment for the proposed redevelopment of the Alexandria Park Community School, 7-11 Park Road, Alexandria (the 'subject area'). The results of the due diligence process indicate that the proposed activity has the potential to result in harm to Aboriginal objects. This harm is considered a risk across the entire study area, with a higher risk the north-western part, where earthworks extend into the natural soil profile beneath the introduced fill.

Taking the above conclusions into consideration, the following recommendation is made with regard to Aboriginal cultural heritage:

- Further assessment of Aboriginal cultural heritage is required in accordance with the Secretary's Environmental Assessment Requirements (SEARs) for the project. The assessment should be prepared following OEH guidelines, including Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH 2011) and Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW).

This documentation may be summarised within and/or appended to a Development Application, Statement of Environmental Effects (SEE) or Review of Environment Factors (REF). This report cannot however be used to support an application for an Aboriginal Heritage Impact Permit (AHIP). Such an application would require more detailed investigation involving a formal process of Aboriginal community consultation and the preparation of an Aboriginal Cultural Heritage Assessment Report (ACHAR).

Should you have any questions or concerns please do not hesitate to contact Fenella Atkinson or me on (02) 9555 4000.

Yours faithfully,



**Dr Alan Williams MAACA** • Aboriginal Heritage Team Leader

## Background and Purpose of Document

In NSW, Aboriginal objects, whether recorded or as yet undiscovered, are afforded statutory protection under the *National Parks and Wildlife Act 1974*. Under Section 86 of the Act it is an offence to disturb, destroy or deface Aboriginal objects without the approval of the Director General of the Office of Environment and Heritage (OEH). A breach of Section 86 of the *National Parks and Wildlife Act 1974* could result in prosecution and fines in excess of \$1 million. The OEH provides a series of guidelines as a framework for identifying and managing Aboriginal heritage and the cultural heritage interests of Aboriginal parties within development planning contexts. The Due Diligence process is the first step, outlined in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW, 2010); and is intended to identify whether or not a proposed activity is likely to harm Aboriginal objects.

The NSW Department of Education (DoE) proposes to redevelop the Alexandria Park Community School, on the property known as 7-11 Park Road, Alexandria (Lots 11 DP 615964, 1/74696, 2 & 3/69494, A & B/109038) (**Figure 1**). The proposed redevelopment is being assessed as State Significant Development (SSD) in accordance with Part 4 Division 4.1 of the *Environmental Planning and Assessment Act 1979*. The Secretary's Environmental Assessment Requirements (SEARs) for the project (SSD\_8373) include the following conditions relating to Aboriginal heritage:

*Address Aboriginal Cultural Heritage in accordance with the Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (DECCW 2011) and Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW).*

Further advice has been provided by the Department of Planning and Environment (DPE) indicating that a desktop assessment is sufficient for the SSD Application, with further assessment to be provided at a later stage, if required. Extent Heritage Pty Ltd (Extent) has been commissioned by Tanner Kibble Denton Architects Pty Ltd to undertake the required Aboriginal cultural heritage assessment in two stages:

1. Due diligence for SSD Application submission.
2. Full Aboriginal Cultural Heritage Assessment.

This letter report provides the details and results of (1) above, undertaken for the subject area.

Please note that this letter report addresses only the proposed development of the subject area. It is an initial investigation of constraints and opportunities pertaining to identified existing and potential Aboriginal heritage sites and places on and/or in the immediate vicinity of the subject area. It is not a formal Aboriginal Cultural Heritage Assessment or Aboriginal Heritage Impact Assessment.

## Existing Environment

Geological mapping indicates that the subject area is located within a unit described as medium to fine-grained 'marine' sand with podzols (Dept Mineral Resources 1983). This is the Botany Lowlands dune system, and is also mapped as the Tuggerah Soil Landscape (Chapman & Murphy 1989) (**Figure 2**). The topography of this landscape is characterised by gently undulating to rolling coastal dunefields. These dunes are oriented north-south, with narrow crests, and broad gently inclined concave swales.

This type of landscape limits the potential for the presence of a number of archaeological site types, such as rockshelters and rock engravings, which require sharp exposed sandstone relief that is not common in these areas. Conversely, surface artefact scatters and buried cultural material are likely

to be more prevalent. A notable example of the latter in this soil landscape, includes the recent discovery of dense and significant cultural materials as part of the construction of the Randwick light rail stabling yards (*Sydney Morning Herald*, 30 March 2016).

A geotechnical investigation was undertaken in 2016, to inform a previous development proposal for the subject area (GeoEnviro Consultancy 2016). The investigation included drilling 12 boreholes. In all of the boreholes a deposit identified as fill was encountered - described as gravelly clayey sand, gravelly silty sand and silty sand - and was present to depths ranging from 0.4 to 3.4m below the ground surface. The depth of fill in the western part of the site was much less (0.4-0.6m) than across the remainder of the subject area (1.6-3.4m). Below the fill, a deposit identified as natural soil was encountered - described as fine to medium grained grey and brown sand. If this interpretation is correct, the difference in depths of fill may represent the under-lying undulations within the dune-field, reflecting dune crests and swales across the site. The shallower fill deposit and under-lying deposit in the western part of the subject area potentially representing a former dune crest.

The original native vegetation of the Tuggerah Soil Landscape probably consisted of dry sclerophyll tall open-woodland or forest (Chapman & Murphy 1989). Dominant tree species included smooth-barked apple (*Angophora costata*), Sydney peppermint (*Eucalyptus piperita*), and old man banksia (*Banksia aemula*). The species of the shrubby understorey included bracken (*Pteridium esculentum*), Christmas bush (*Ceratopetalum gummiferum*), woody pear (*Xylomelum pyriforme*), and prickly moses (*Acacia ulicifolia*).

The closest permanent water to the subject area appears to be Sheas Creek, the headwaters of which are located approximately 400m to the south. However, historical mapping indicates that the creek arose in a swamp, Sheas Creek Swamp, which was in close proximity, and may have extended into the southern part of the subject area (**Figure 3**).

Particular landforms are known to have been favoured locations for repeated or long-term occupation, and are therefore more likely to retain archaeological evidence of past Aboriginal use. OEH specifies five landscape features which are likely to indicate the presence of Aboriginal objects (OEH, 2010):

- Within 200m of waters.
- Within a sand dune system.
- On a ridge top, ridge line or headland.
- Within 200m below or above a cliff face.
- Within 20m of or in a cave, rock shelter, or a cave mouth.

Two of the above landscape features are relevant; the subject area is within the Botany Lowlands dune system, and most or all of the subject area is within 200m of the former Sheas Creek Swamp.

It should also be noted that the historical research has indicated the potential for intangible Aboriginal cultural values associated with the subject area. The Federal Match Factory, which operated on the northern part of the subject area from 1914 to 1975 was at one stage a significant employer of Aboriginal women (City of Sydney 2013). This aspect of the heritage of the subject area should be addressed further in the detailed assessment.

### **Previous Disturbance**

The archaeological potential of a particular area also depends on the nature and extent of development in the historical period, as previous ground disturbance is likely to have had an impact on any archaeological deposits that may have been present. The historical development of the subject area is outlined in the historical archaeological assessment (Extent Heritage, Sept 2017).

In brief, the subject area was part of a grant of land made to William Hutchinson in 1823; in this early period, the Waterloo Estate was used for agriculture, including market gardening, and some residential development. Industrial development of the neighbourhood began in the 1860s. Development of the subject area itself appears to have started in c1910, on the northern part of the subject area. Additional industrial premises followed, and by 1943, the whole of the subject area had been developed; the northern part for a timber mill, and the southern for a match factory (**Figure 4**). A stormwater channel was cut through the subject area, as part of the construction of the Alexandra Canal. In the late 1970s, the subject area was resumed by the Minister for Education, and in c1980 it was redeveloped for use as a school.

The known historical development has affected the whole of the subject area, and is likely to have involved removal of any culturally scarred trees and surface archaeological sites. There is potential that sub-surface cultural deposits have also been affected by the historical earthworks. Excavation would have been undertaken for building footings and services, and for the stormwater channel, but no indication of substantial excavations (e.g. basements) has been found. In contrast, the results of the geotechnical investigation indicate that a large amount of fill has been introduced to the subject area. This may have tended to preserve the earlier soil profile, and any associated cultural deposit, in the areas subject to fill.

### **Archaeological Context**

A number of Aboriginal archaeological investigations have previously been undertaken in the locality of the subject area. Summaries of relevant and accessible reports are provided below.

#### **Sheas Creek / Alexandra Canal**

Excavation at Sheas Creek, now Alexandra Canal, in the 1890s, revealed the presence of two shell horizons. Archaeological evidence in these horizons included stone axes and butchered bone. The finds were made in two locations along the Alexandra Canal, 232 and 824 m to the north of Ricketty Street (Attenbrow 1984: 3); that is, along the stretch of the Canal about 2.4km to the south-west of the subject area. A sample of the bone was later dated, and yielded an age of 5,520 ± 70 BP (conventional age) (JMCHM March 2005: 9).

#### **National Centre of Indigenous Excellence, 180 George Street, Redfern (AHMS, March 2007)**

The assessment identified that the site, located 0.7km to the north-east of the present subject area, had the potential to be on aeolian dunes in the general vicinity of Blackwattle Creek, a significant water source running through the southern edge of the Sydney CBD. These findings, along with the relatively undisturbed nature of the site, prompted test excavations. Excavations consisted of four 1m<sup>2</sup> test pits, which reached depths of up to 90cm and confirmed the aeolian nature of the underlying soils. However, no Aboriginal objects were recovered.

**Former Rachel Forster Hospital, 134-150 Pitt Street, Redfern (AHMS, June 2007)**

A preliminary Aboriginal and historical archaeological assessment of this site, located 0.7km to the north-east of the subject area, was undertaken to inform the Environmental Assessment of the proposed Concept Plan for redevelopment. The site had been subject to substantial excavation due to historical development, but sections of the original soil profile remained in places. A section was visible in the eastern part of the site; at the northern end, a former A1-horizon (10cm in depth) overlay a bleached sandy loam (30cm) then a sandy clay with laterite inclusions (15cm); at the southern end, a former A1 horizon (20cm) overlay a sand deposit (80cm).

The soil profile was interpreted as aeolian sands, being part of the Tuggerah and Newport soil landscapes, and thought to have been deposited c10,000 years BP. In addition, it was considered likely that former streams and swamps in the immediate locality would have provided resources attractive to the local Aboriginal population. The remnant soils within the site were therefore assessed as having potential to contain remains of Aboriginal occupation.

**Redfern Courthouse and Police Station, 103-105 Redfern Street, Redfern (Austral Archaeology, Aug 2007)**

The preliminary assessment of this site, located 1km to the north-east of the present subject area, found that it was located in an area that would have been particularly favourable for Aboriginal occupation. The area is situated on the western edge of an extensive dune system (Tuggerah soil landscape) and within the Cooks River catchment which included fresh water wetlands (Botany and Lachlan Swamps), fresh water creeks (Tank Stream), and tidal creeks and rivers (Sheas Creek and Georges and Parramatta Rivers). In addition, rain water would have collected in the swales of the dune system, forming lagoons and wetland habitats. This landscape would have supported a range of floral and faunal resources.

However, it was considered likely that historical development of the site had resulted in removal or extensive disturbance to the original soil profile across the whole site. The results of the geotechnical investigation supported this interpretation, showing fill (to a depth of 0.15-0.4m) over clay, and indicating that the topsoil had been entirely removed. It was therefore considered that there was low potential for Aboriginal archaeologically sensitive areas to be present within the site.

**157-159 Redfern Street, Redfern (Cultural Resources Management, June 2009)**

The project area for this investigation was the Redfern RSL site, located 0.9km to the north-east of the present subject area. The report found that the water and other resources available in the immediate vicinity would have encouraged long-term or permanent occupation, which would have resulted in the creation of a substantial and complex artefact assemblage. However, insufficient evidence was available to assess the level of historical disturbance to the soil profile of the site, and it was therefore not possible to determine the Aboriginal archaeological potential. Further investigation, in the form of archaeological test excavation, was recommended.

**Royal Sydney Golf Club (JMCHM 2010)**

An archaeological salvage excavation was undertaken prior to the development of new structures at the Royal Sydney Golf Club, located on the Botany Bay Lowlands dune system, and approximately 7km to the north-east of the present subject area. Extensive excavation of the northern bowling lawn recovered several human remains (at least three individuals) and over 5,700 artefacts within a disturbed and truncated dune deposit. This sample came from beneath skeletal remains in feature 1. The assemblage was of middle to late Bondaian age and was dominated by quartz with lesser

proportions of silcrete, silicified tuff, silicified wood, quartzite and other fine-grained siliceous material. Several backed blades and bipolar flakes and cores were recovered.

**157-163 Cleveland Street, Redfern (Cultural Resources Management and Biosis Research, Oct 2011)**

This site, located 1.2km to the north of the present subject area, was found to be highly disturbed, as a result of substantial historical development. However, the geotechnical investigation revealed the presence of a sand deposit underlying fill, at a depth of between 1m and 4.85m. It was considered likely that the sand was associated with a buried stream, and had the potential to contain Aboriginal archaeological material.

**Redfern, Waterloo and South Eveleigh Urban Renewal Sites (AHMS, April 2014)**

This desktop assessment addressed three public housing sites, located 0.5km to the east, 1.2km to the north-east, and 0.4km to the north-west of the present subject area. The Waterloo site was described as located on the upper slopes of Mount Carmel, likely to represent the upper slope of a large sand dune of the Tuggerah soil landscape. The northern and western sections of the site had been subject to deep excavation, and the potential for the survival of cultural material in these locations was considered to be low to nil. However, the southern part of the site was considered to have potential for intact and complex cultural material related to the Aboriginal occupation of the area, considering the location within 200m of parts of Waterloo swamp, and the depth of the natural soil profile.

The Redfern site was described as including a ridge, running north south, which is likely to represent the crest of a large sand dune of the Tuggerah soil landscape. It is in close proximity to the former Boxley's Lagoon (now Redfern Park), which is known to have been used by Aboriginal people in the early post-contact period, and includes the location of a second swamp or lagoon. Parts of the west and central sections of the site have been subject to deep excavation, and were assessed as having low to nil archaeological potential. However, most of the remainder of the site was thought to have high archaeological potential, due to its proximity to water, documentary evidence of Aboriginal occupation, and deep natural soil profile.

The South Eveleigh site, in contrast, was situated on shallow duplex soils, and over 800m from any documented water source. It was considered that previous ground disturbance had compromised much of the natural soil profile, and the potential for significant or intact Aboriginal cultural material being present was low.

**175-177 Cleveland Street and 1-5 Woodburn Street, Redfern (AHMS, Nov 2014)**

This site is located within 200m of the former alignment of Blackwattle Creek, and 1.2km to the north of the present subject area. Such a location, close to water and therefore favourable for occupation, would generally be considered to indicate the potential for the presence of Aboriginal archaeological evidence. However, it was considered that the historical development of the site would have impacted the full depth of the former soils, as the site is located on the Blacktown soil landscape. It was considered unlikely that any Aboriginal objects were present.

**60-78 Regent Street, Redfern (Artefact, Dec 2014)**

This report investigated an area, located 0.9km to the north-east of the present subject area, near the interface of the Tuggerah and Blacktown soil landscapes, with the former being associated with the aeolian dunefields of the Botany Lowlands dune system, deposited in the late Pleistocene and



Holocene. The topography consists of gently undulating to rolling coastal dunefields, and the site is situated in close proximity to Boxley's Lagoon and Blackwattle Swamp. However, the results of geotechnical investigation demonstrated that the A horizon had been entirely removed as a result of the historical development of the site. It was therefore considered that the site had low potential to contain Aboriginal objects or archaeological deposits.

#### **Alexandria Park Community School (Comber Consultants, Nov 2016)**

A due diligence Aboriginal heritage assessment was undertaken prior to the construction of a temporary school on the northern part of the subject area, the present playing field. It was stated that the previous historical development of the playing field would have destroyed any Aboriginal objects which may once have been present. However, the report also included a more cautious assessment, noting that 'in the unlikely event that subsurface archaeological evidence remains, it will be located below the fill and will not be disturbed'.

### **Aboriginal Heritage Information Management System (AHIMS) Database**

The Office of Environment and Heritage maintains the Aboriginal Heritage Information Management System (AHIMS), which is a database of registered Aboriginal sites in New South Wales. A search of the AHIMS database was carried out on 7 September 2017 (Client Service ID 300359), for a 5km square centred on the subject area. The full search results are listed in **Appendix 3** and shown in **Figure 5**. There are 15 registered sites within the search area, none of which are located within the subject area.

In the AHIMS system, sites are recorded with one or more of 20 site features, which describe the characteristics of each site. For the 15 sites within the search area, a total of 20 instances of six site features has been recorded (**Table 1**).

**Table 1. Summary of site features from the AHIMS search.**

Site features	Number of Sites	Percentage (%)
Artefact	8	40
Potential Archaeological Deposit	7	35
Aboriginal Resource and Gathering	2	10
Art (Pigment or Engraved)	1	5
Non-Human Bone and Organic Material	1	5
Shell	1	5
<b>Total</b>	<b>20</b>	<b>100</b>

### **Site Inspection**

The subject area was inspected by Alistair Hobbs and Lorna Cooper (Extent Heritage Advisors), with the assistance of Mauricio Diaz Miranda (TKD Architects) on 1 September 2017. The subject area was investigated for the presence of Aboriginal objects/sites, or the potential for them to occur. Inspection covered all parts of the subject area, with a focus given to areas providing good ground exposure to determine the presence of objects and/or disturbance levels.

Topography of the subject area comprises relatively flat low-lying terrain that has been cleared of all natural vegetation. Ground surface visibility was considered generally poor due to concrete covering most of the subject area. The presence of an existing concrete-lined trunk drainage easement can still be seen, running in a northeast to southwest orientation across the small playing field, located in the southern half of the subject area. It is considered this drainage easement was installed pre 1940s and possibly connects to the Alexandria Canal, located ~2 km southwest of the subject area. Installation of this easement would have had a large impact on the natural soil profile and it is highly likely the easement was installed to a depth of 2-3m below the surface.

The site is currently operating as a functioning school with existing buildings located in the southern half of the subject area (**Plate 1 - Plate 2**), temporary building structures in the north-west part of the subject area (**Plate 3 - Plate 4**), a construction site in the north-east part of the subject area (**Plate 5 - Plate 6**) and a central sports court, playing field with existing services (including water and electricity), sand pit and play equipment (**Plate 7 - Plate 10**). The open playing fields, situated in the central part of the subject area were the only places that contained surface exposures that revealed sandy material, concrete and brick rubble. It is considered this deposit represents a fill layer covering most of the subject area and is associated with previous land clearance when the factory buildings existed.

The subject area has been heavily disturbed and landscaped, which has truncated the natural soil profile of the subject area to a degree. Based on the geotechnical investigations (GeoEnviro Consultancy 2016), there is approximately 40–340cm of fill covering the subject area.

During the site inspection, no Aboriginal objects or sites were identified. This includes stone artefact scatters, isolated finds and scarred or carved trees. Based on the site inspection, it is considered that the subject area has nil-low potential to contain Aboriginal objects on the surface due to previous clearing. However, the under-lying soil profile could not be reliably investigated as part of the site inspection due to the level of introduced fill, landscaping and paving present on the site.



## Proposed Development

The Department of Education proposes to redevelop Alexandria Park Community School to cater for up to approximately 1,000 primary school students and 1,200 secondary school students (**Figure 6**). The development will include replacement of the two-storey school building with a five-storey structure to be built on the western boundary of the subject area, and a three-level structure on the southern boundary. The development would also involve construction of a sports hall, new playing fields, and landscaping. The exact extent of the potential impact is unclear, based on the available data, but impact is possible where excavation extends deeper than the identified fill units.

## Conclusions and Recommendations

In NSW, Aboriginal objects are provided with statutory protection by the *National Parks and Wildlife Act 1974*. OEH has developed a due diligence process to assist in determining whether a proposed activity is likely to result in harm to Aboriginal objects (DECCW 2010). The results of the due diligence process are outlined in **Table 2**.

Two landscape features that are likely to indicate the presence of Aboriginal objects are relevant to the subject area: i) it is within the Botany Lowlands dune system, and; ii) it is adjacent to the former Sheas Creek Swamp. Although historical development and occupation of the subject area has involved ground disturbance, in general material has been introduced rather than removed, and this would have tended to conserve, or cap, any cultural deposits that may have been present.

However, the potential for the presence of Aboriginal objects is also limited by a number of factors. The results of previous sub-surface archaeological investigation of properties within the Botany Lowlands dune system demonstrate that archaeological deposits are absent from at least some parts of this landscape (AHMS March 2007). The available evidence indicates that much of the present subject area was originally low-lying, and may not have been suited to long-term or repeated Aboriginal occupation. The potential for the presence of Aboriginal objects may, therefore, be limited to the north-western section of the subject area, which was more elevated. In addition, Aboriginal objects are unlikely to be present within the introduced fill material, unless the fill contains cultural deposits from elsewhere (in this situation they would be of low significance since they would lack any archaeological context).

The results of the due diligence process indicate that the proposed activity has potential to result in harm to Aboriginal objects. This harm is considered a risk across the entire study area, with a higher risk the north-western part, where earthworks extend into the natural soil profile beneath the introduced fill (**Figure 7**).

Taking the above conclusions into consideration, the following recommendations are made with regard to Aboriginal cultural heritage:

- Further assessment of Aboriginal cultural heritage is required in accordance with the Secretary's Environmental Assessment Requirements (SEARs) for the project. The assessment should be prepared following OEH guidelines, including *Guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011) and *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW).

**Table 2. Site specific responses to OEH due diligence questions.**

<b>1</b>	<b>Will the activity disturb the ground surface or any culturally modified trees?</b>	
	The proposed activity consists of redevelopment of the subject area, and will result in ground disturbance across most, if not all, of the subject area.	Proceed to question 2.
	There are no old-growth trees within the subject area, and the proposed activity will therefore not result in disturbance to any culturally modified trees.	
<b>2a</b>	<b>Are there any relevant confirmed site records or other associated landscape feature information on AHIMS?</b>	
	The AHIMS database does not record any previously recorded sites within the subject area.	Proceed to question 2b.
<b>2b</b>	<b>Are there any other sources of information of which a person is already aware?</b>	
	A previous due diligence assessment found that the potential for the presence of Aboriginal objects within the northern part of the subject area was low. The southern part of the subject area was not assessed.	Proceed to question 2c.
<b>2c</b>	<b>Are there any landscape features that are likely to indicate presence of Aboriginal objects?</b>	
	The subject area is located within a dune system, and adjacent to the former Sheas Creek Swamp; both landscape features that are listed by OEH as being likely to indicate the presence of Aboriginal objects.	Proceed to question 3.
<b>3</b>	<b>Can harm to Aboriginal objects listed on AHIMS or identified by other sources of information and/or can the carrying out of the activity at the relevant landscape features be avoided?</b>	
	The proposed activity consists of the redevelopment of an existing Department of Education school property, and cannot be carried out at an alternate location.	Proceed to question 4.
<b>4</b>	<b>Does a desktop assessment and visual inspection confirm that there are Aboriginal objects or that they are likely?</b>	
	The results of the assessment and site inspection indicate that deep natural soil profiles are present below fill within the subject area. Archaeological deposits may be preserved within these soils. Any such deposits are likely to be limited to the more elevated section of the subject area, and to have been affected by earthworks undertaken as part of the historical development of the subject area.	Further assessment not required; works may proceed with caution.

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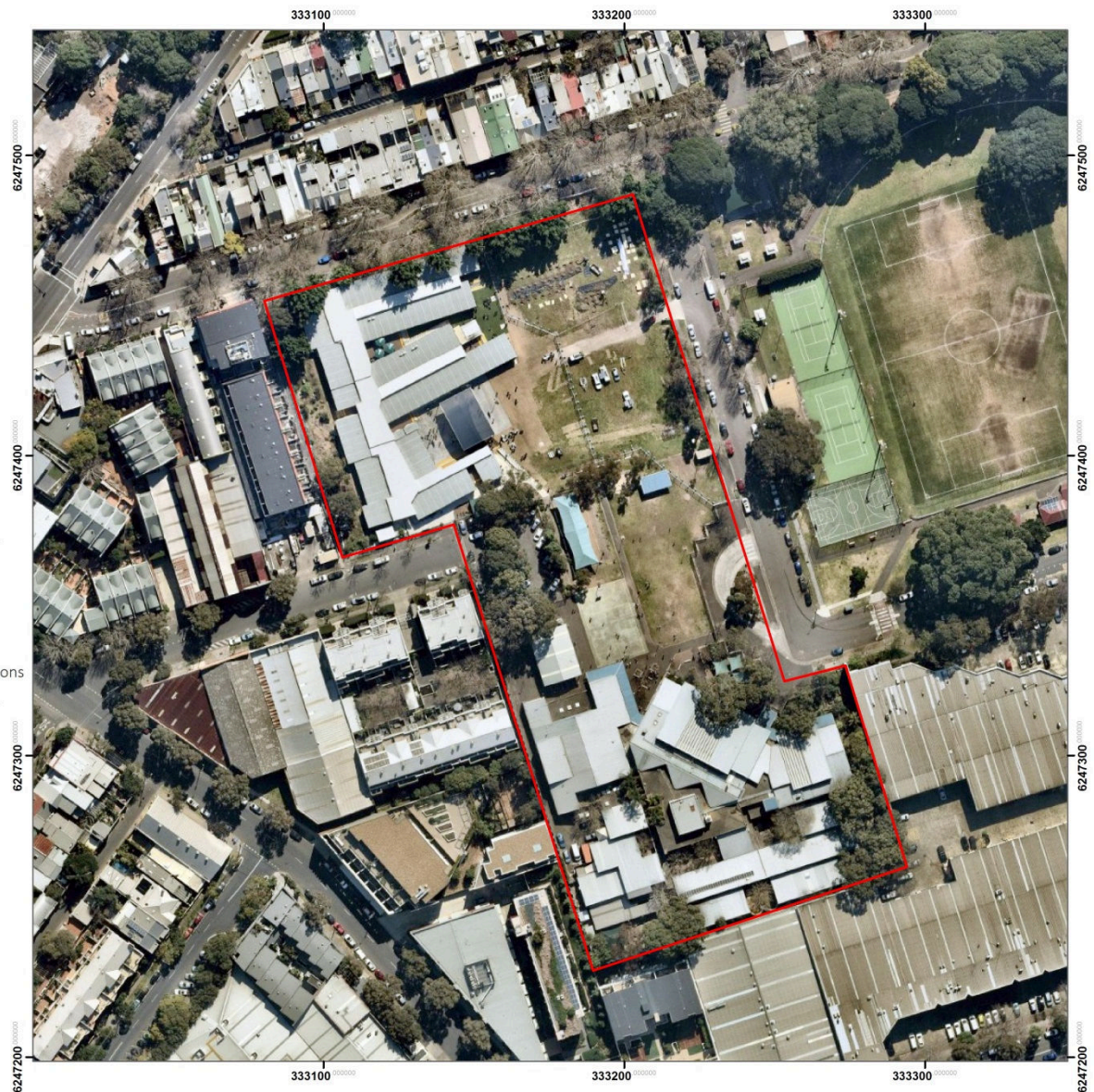
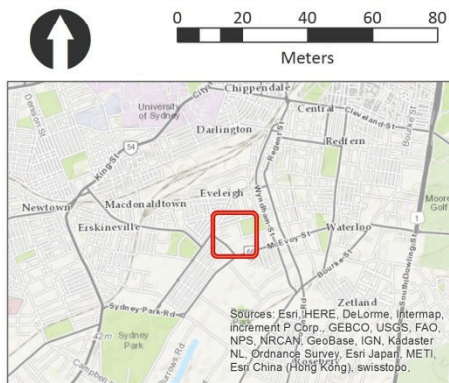
EXTENT

HERITAGE ADVISORS  
TO AUSTRALIA AND  
THE ASIA PACIFIC  
Incorporating AHMS and Futurepast

# Alexandria Park Community School, Aboriginal Heritage Due Diligence Assessment, Alexandria NSW

 Study Area

Drawn by: Alistair Hobbs  
Checked by: Fenella Atkinson  
Date: 12 Sept 2017  
Projection: GDA 94 MGA Zone 56  
Data sources: Extent, Nearmap, Administrative Boundaries ©  
PSMA Australia Limited licensed by the  
Commonwealth of Australia under Creative Commons  
Attribution 4.0 International licence (CC BY 4.0).



**Figure 1. Location of the study area.**





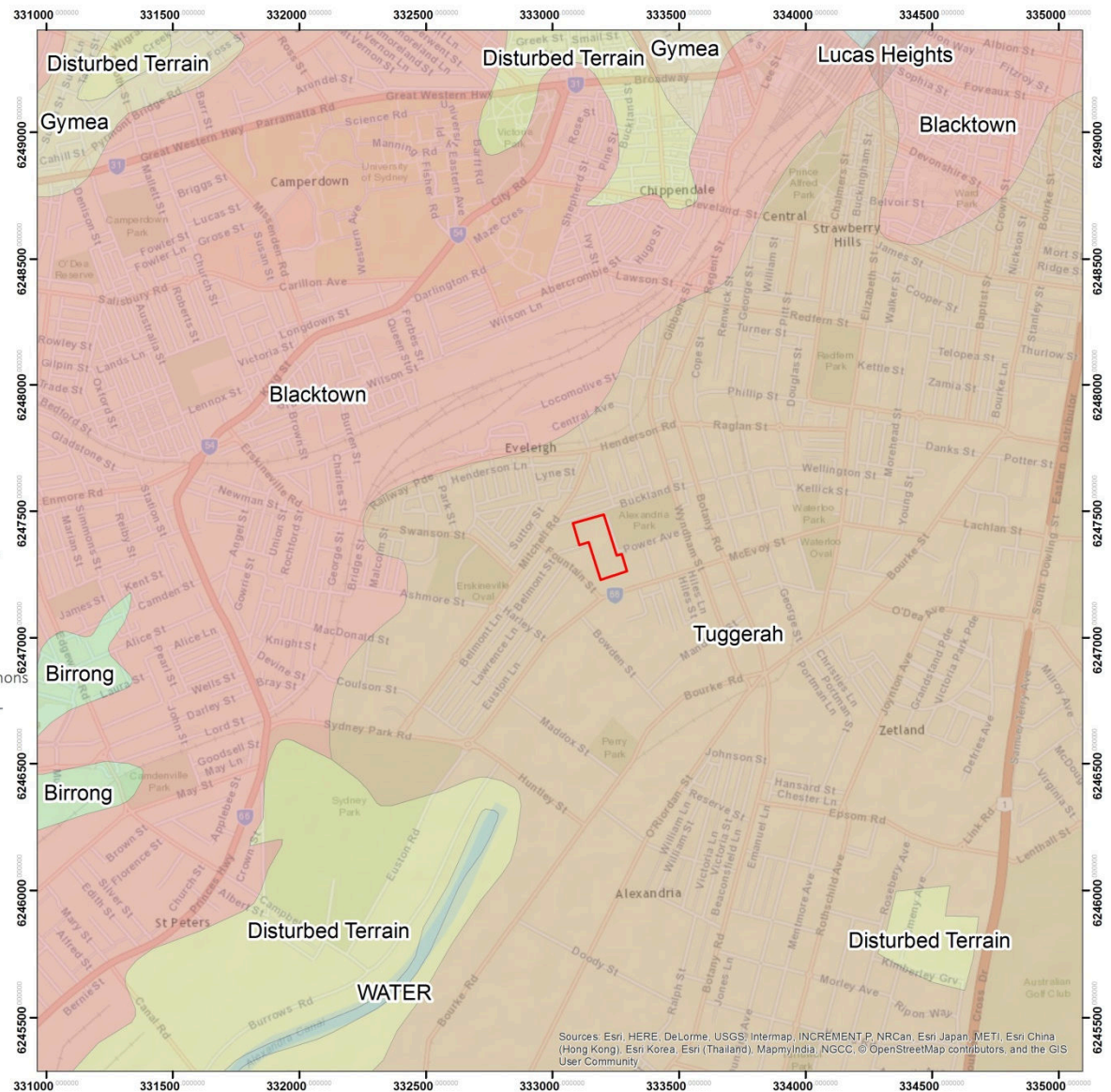
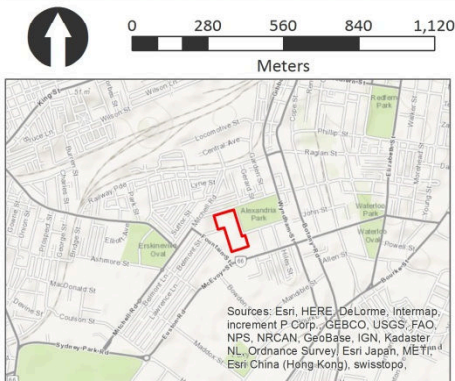
**Alexandria Park Community School,  
Aboriginal Heritage Due Diligence  
Assessment, Alexandria NSW**

Study Area

**Soil Landscapes**

- Birrong
- Blacktown
- Deep Creek
- Disturbed Terrain
- Gymea
- Lucas Heights
- Tuggerah
- WATER

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**Figure 2. Soil landscape mapping, with the study area outlined in red.**



EXTENT

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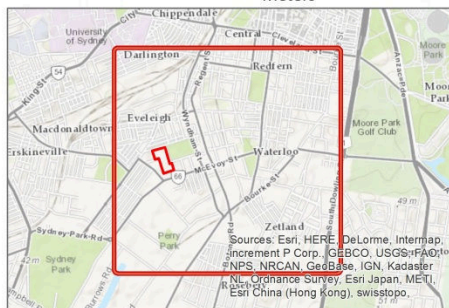
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0 150 300 450 600  
Meters



**Figure 3. 1876 map showing the former extent of the Sheas Creek Swamp in relation to the subject area.**



EXTENT

HERITAGE ADVISORS  
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THE ASIA PACIFIC

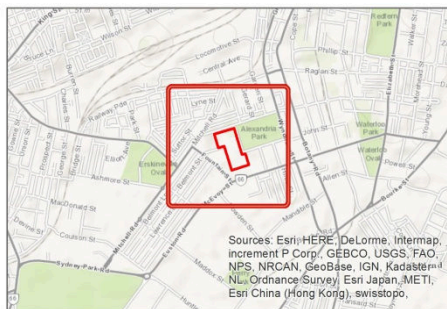
Incorporating AHMS and Futurepast

**Alexandria Park Community School,  
Aboriginal Heritage Due Diligence  
Assessment, Alexandria NSW** Study Area

Drawn by: Alistair Hobbs  
 Checked by: Fenella Atkinson  
 Date: 12 Sept 2017  
 Projection: GDA 94 MGA Zone 56  
 Data sources: Extent, Nearmap, Administrative Boundaries ©  
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0 40 80 120 160  
Meters

**Figure 4. 1943 historic aerial photograph of the subject area.**



## EXTENT

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Incorporating AHMS and Futurepast

Alexandria Park Community School,  
Aboriginal Heritage Due Diligence  
Assessment, Alexandria NSW

Study Area

## AHIMS Results

## Site Features

- Aboriginal Resource and Gathering
- Art (Pigment or Engraved), Artefact
- Artefact, Aboriginal Resource and Gathering, Non-Human Bone and Organic Material
- Artefact, Potential Archaeological Deposit (PAD)
- Artefact
- Potential Archaeological Deposit (PAD)
- Shell, Artefact

Drawn by: Alistair Hobbs

Checked by: Fenella Atkinson

Date: 12 Sept 2017

Projection: GDA 94 MGA Zone 56

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0 340 680 1,020 1,360  
Meters

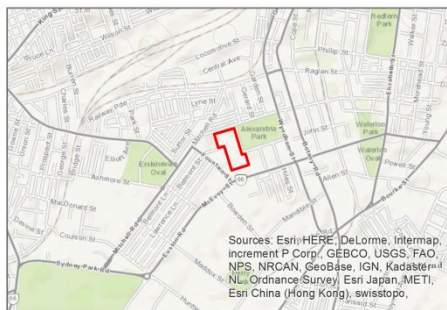


Figure 5. AHIMS search results.





Rev	Date	Description	Checked	Approved
P1	01.12.17	Issue For Test of Adequacy	AH	

ALEXANDRIA PARK  
COMMUNITY SCHOOL

Proj. Dir.	Proj. Asst.	Drawn
AK	AH	BO/HC
Job No.	Sheet	Scale
161044	B1	1 : 500
Company No.	Revision	

AR.DA. 2001

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**Alexandria Park Community School,  
Aboriginal Heritage Due Diligence  
Assessment, Alexandria NSW**

 Study Area

**Archaeological Risk**

**Risk of Harming Aboriginal Objects**

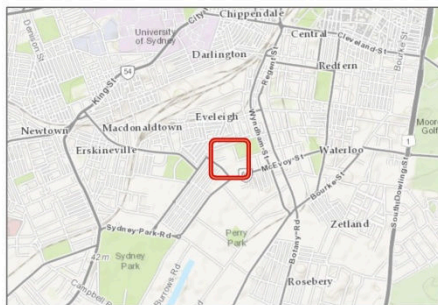
 Higher

 Lower

Drawn by: Alistair Hobbs  
Checked by: Fenella Atkinson  
Date: 12 Sept 2017  
Projection: GDA 94 MGA Zone 56  
Data sources: Extent, Nearmap, LPI



0 10 20 30 40 50  
Meters



**Figure 7.** *Indicative risk assessment for harm to occur to Aboriginal objects below the fill layer.*

## SITE INSPECTION - PHOTOGRAPHS





**Plate 1. School Buildings in southern part of the study area.**



**Plate 2. School buildings in southern part of the study area.**



**Plate 3. Temporary school buildings in northern part of the study area.**



**Plate 4. Temporary school buildings in northern part of the study area.**



**Plate 5. Construction site located in the northeast part of the study area.**



**Plate 6. Construction site located in the northeast part of the study area.**





***Plate 7. Open playing field adjacent to temporary buildings.***



***Plate 8. Play area and climbing equipment situated to the west of the open playing field.***



***Plate 9. Central playing field situated between the existing school and the temporary buildings.***



***Plate 10. Central playing field with existing storm drain in the foreground.***



## Appendix 1: Legislation

## Commonwealth Legislation

### Aboriginal and Torres Strait Islander Heritage Protection Act 1984

The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* was enacted at a Federal level to preserve and protect areas (particularly sacred sites) and objects of particular significance to Aboriginal Australians from damage or desecration. Steps necessary for the protection of a threatened place are outlined in a gazetted Ministerial Declaration (Sections 9 and 10). This can include the preclusion of development.

As well as providing protection to areas, it can also protect objects by Declaration, in particular Aboriginal skeletal remains (Section 12). Although this is a Federal Act, it can be invoked on a State level if the State is unwilling or unable to provide protection for such sites or objects.

### Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* provides for the protection of natural and cultural heritage places. The Act establishes (amongst other things) a National Heritage List (NHL) and a Commonwealth Heritage List (CHL). Places on the NHL are of natural or cultural significance at a national level and can be in public or private ownership. The CHL is limited to places owned or occupied by the Commonwealth which are of heritage significance for certain specified reasons.

Places listed on the NHL are considered to be of State and local heritage value, even if State or local various heritage lists do not specifically include them.

The heritage values of places on the NHL or the CHL are protected under the terms of the EPBC Act. The Act requires that the Minister administering the EPBC Act assess any action which has, will have, or is likely to have, a significant impact on the heritage values of a listed place. The approval (or rejection) follows the referral of the matter by the relevant agency's Minister.

### Native Title Act 1993

The *Native Title Act 1993* provides recognition and protection for native title. The Act established the National Native Title Tribunal to administer native title claims to rights and interests over lands and waters by Aboriginal people. The Tribunal also administers the future act processes that attract the right to negotiate under the Native Title Act 1993.

The Act also provides for Indigenous Land Use Agreements (ILUA). An ILUA is an agreement between a native title group and others about the use and management of land and waters. ILUAs were introduced as a result of amendments to the Native Title Act in 1998. They allow people to negotiate flexible, pragmatic agreements to suit their particular circumstances.

An ILUA can be negotiated over areas where native title has, or has not yet, been determined. They can be part of a native title determination, or settled separately from a native title claim. An ILUA can be negotiated and registered whether there is a native title claim over the area or not.

## NSW State Legislation

### Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) requires that environmental and heritage impacts are considered by consent authorities prior to granting development approvals. The relevant sections of the EP&A Act are:

- Part 4: Development that requires consent under consideration of environmental planning instruments.
- Part 5: An assessment process for activities undertaken by Public Authorities and for developments that do not require development consent but an approval under another mechanism.

Where Project Approval is to be determined under Part 4 (Division 4.1) of the Act, further approvals under the National Parks and Wildlife Act 1974, are not required. In those instances, management of Aboriginal heritage follows the applicable Aboriginal assessment guidelines (the Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation, July 2005) and any relevant statement of commitments included in the Development Approval.

### National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NPW Act) provides blanket protection for Aboriginal objects (material evidence of Indigenous occupation) and Aboriginal places (areas of cultural significance to the Aboriginal community) across NSW. An Aboriginal object is defined as:

*... 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.*

An Aboriginal place is any place declared to be an Aboriginal place by the Minister for the Environment, under Section 84 of the Act.

It is an offence to disturb Aboriginal objects or places without a permit authorised by the Director-General of the Office of Environment and Heritage. In addition, anyone who discovers an Aboriginal object is obliged to report the discovery to OEH.

The operation of the NPW Act is administered by OEH. With regard to the assessment of Aboriginal cultural heritage, OEH has endorsed the following guidelines:

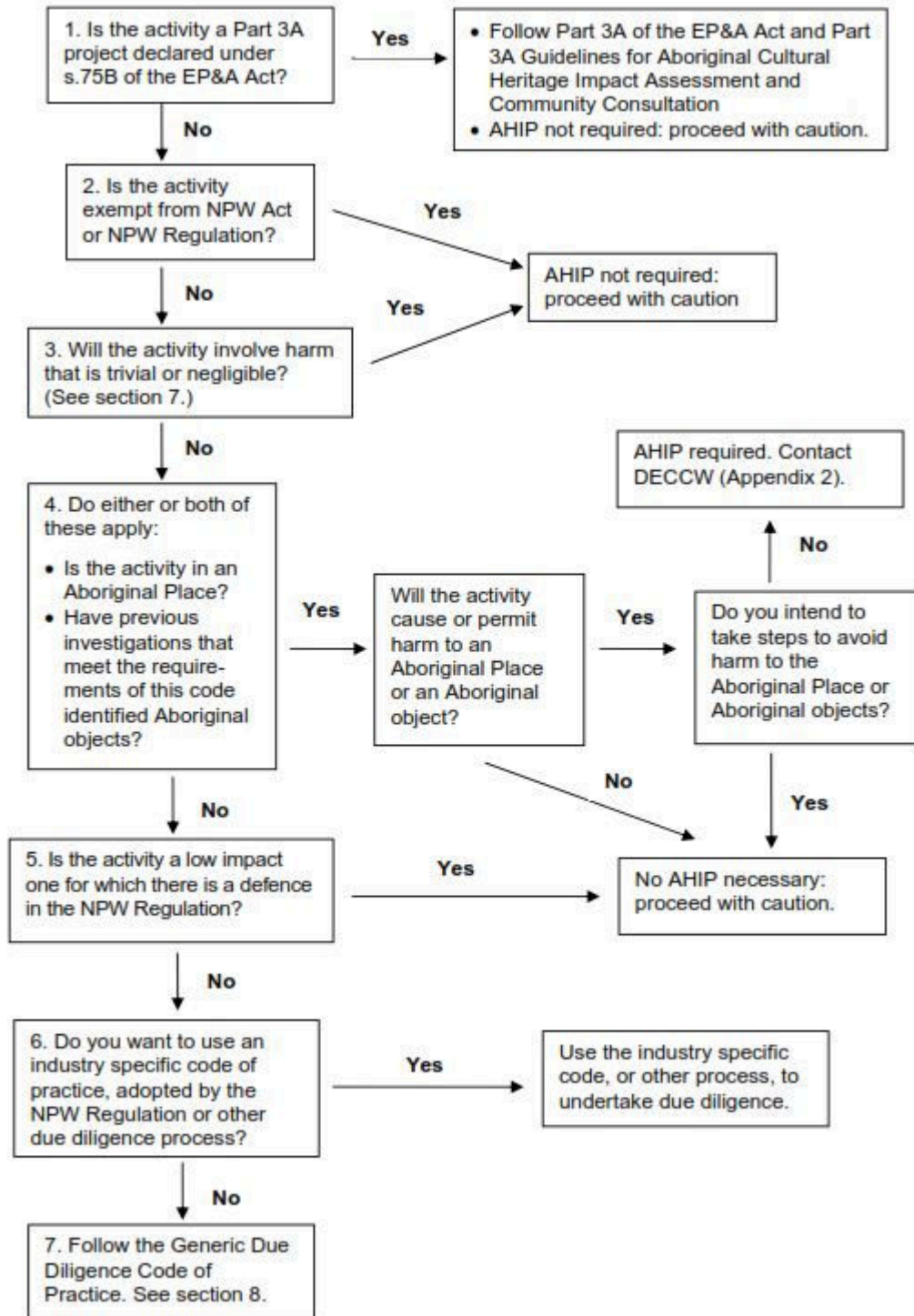
- Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (2010).
- Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (2010).
- Aboriginal Cultural Heritage Consultation Requirements for Proponents (2010).

- Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (2011).

### **Aboriginal Land Rights Act 1983**

The *Aboriginal Land Rights Act 1983* allows for the transfer of ownership to a Local Aboriginal Land Council of vacant Crown land not required for an essential purpose or for residential land. These lands are then managed and maintained by the Local Aboriginal Land Council.

## Appendix 2: Due Diligence Flow Chart



## Appendix 3: AHIMS Search Results



# AHIMS Web Services (AWS)

## Extensive search - Site list report

Your Ref/PO Number : SYD17065

Client Service ID : 300359

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
45-6-2597	Wynyard St Midden	AGD	56	333469	6247920	Open site	Valid	Shell : -, Artefact : -	Midden	102494,102763,102765
	<u>Contact</u>									
	<u>Recorders</u>			Mr.D Coe				<u>Permits</u>		
45-6-2676	Johnstons Creek	AGD	56	331100	6249100	Closed site	Valid	Art (Pigment or Engraved) : 2, Artefact : 5		102142,102763
	<u>Contact</u>			Michael Guider				<u>Permits</u>		
45-6-2666	Wattle Street PAD 1	AGD	56	333150	6249450	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,102763,102765
	<u>Contact</u>			Dominic Steele Archaeological Consulting				<u>Permits</u>	1738	
45-6-2663	Mountain Street Ultimo	AGD	56	333300	6249400	Open site	Valid	Artefact : -, Potential Archaeological Deposit (PAD) : -		102494,102763,102765
	<u>Contact</u>			Mary Dallas Consulting Archaeologists				<u>Permits</u>	1719	
45-6-2680	Broadway Picture Theatre PAD 1	AGD	56	333150	6249000	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102142,102494,102763,102765
	<u>Contact</u>			Jim Wheeler				<u>Permits</u>	1854	
45-6-2979	UTS PAD 1 14-28 Ultimo Rd Syd	GDA	56	333650	6249590	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,102763,102765
	<u>Contact</u>			Dominic Steele Archaeological Consulting,Mr.Dominic Steele				<u>Permits</u>	3458	
45-6-0751	Shea's Creek Dugong	GDA	56	331839	6245378	Open site	Destroyed	Artefact : -, Aboriginal Resource and Gathering : -, Non-Human Bone and Organic Material : -	Open Camp Site	
	<u>Contact</u>			ASRSYS,AECOM Australia Pty Ltd (previously HLA-Envirosciences),Mr.Luke Kirkw				<u>Permits</u>		
45-6-2745	University of Sydney Law Building PAD	AGD	56	332350	6248740	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102201,102494,102763,102765
	<u>Contact</u>			Doctor.Jo McDonald				<u>Permits</u>	2153,2320,2443	
45-6-3071	445-473 Wattle Street PAD	GDA	56	333285	6249412	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		
	<u>Contact</u>			Biosis Pty Ltd - Sydney				<u>Permits</u>		
45-6-2987	Poultry Market 1	GDA	56	333746	6249575	Open site	Valid	Artefact : 1		102494,102763

Report generated by AHIMS Web Service on 07/09/2017 for Fenella Atkinson for the following area at Datum :GDA, Zone : 56, Eastings : 330700 - 335700, Northings : 6244900 - 6249900 with a Buffer of 0 meters. Additional Info : Due diligence Aboriginal heritage assessment, possibly followed by a more detailed assessment. Number of Aboriginal sites and Aboriginal objects found is 15

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# AHIMS Web Services (AWS)

## Extensive search - Site list report

Your Ref/PO Number : SYD17065

Client Service ID : 300359

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
	<u>Contact</u>	<u>Recorders</u>	Ms.Samantha Higgs,Biosis Pty Ltd - Canberra					<u>Permits</u>	3506	
45-6-3064	445-473 WATTLE ST PAD	GDA	56	333285	6249412	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		102763
	<u>Contact</u>	<u>Recorders</u>	Biosis Pty Ltd - Sydney					<u>Permits</u>		
45-6-3155	Moore Park AS1	GDA	56	335613	6247909	Open site	Destroyed	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	Artefact - Cultural Heritage Management ,Mr.Josh Symons,Mr.Alex Timms					<u>Permits</u>	4019	
45-6-2629	Broadway 1	AGD	56	333060	6249100	Open site	Valid	Artefact : -		102494,10276 3,102765
	<u>Contact</u>	<u>Recorders</u>	Dominic Steele Archaeological Consulting					<u>Permits</u>	1299	
45-6-2767	Tent Embassy	AGD	56	332680	6248680	Open site	Valid	Aboriginal Resource and Gathering : 1		102494,10276 3,102765
	<u>Contact</u> T Russell	<u>Recorders</u>	Bill Lord					<u>Permits</u>		
45-6-2822	USYD: Central	AGD	56	332750	6248550	Open site	Valid	Artefact : -		100302,10249 4,102763,1027 65
	<u>Contact</u>	<u>Recorders</u>	Jo McDonald Cultural Heritage Management see GML					<u>Permits</u>	2554	

Report generated by AHIMS Web Service on 07/09/2017 for Fenella Atkinson for the following area at Datum :GDA, Zone : 56, Eastings : 330700 - 335700, Northings : 6244900 - 6249900 with a Buffer of 0 meters. Additional Info : Due diligence Aboriginal heritage assessment, possibly followed by a more detailed assessment. Number of Aboriginal sites and Aboriginal objects found is 15

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