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Loreto Normanhurst Masterplan - Aboriginal Cultural Heritage Assessment

Allen Jack & Cottier on behalf of Loreto Normanhurst

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Abbreviations

Abbreviation	Description
ACHA	Aboriginal Cultural Heritage Assessment
AHIP	Aboriginal Heritage Impact Permit
AHIMS	Aboriginal Heritage Information Management System
ARD	Archaeological Research Design
ATR	Archaeological Technical Report
DECCW	(Former) Department of Environment Climate Change and Water
ELA	Eco Logical Australia Pty Ltd
LEP	Local Environmental Plan
OEH	NSW Office of Environment and Heritage
PAD	Potential Archaeological Deposit
SHI	State Heritage Inventory
SHR	State Heritage Register

Executive Summary

Eco Logical Australia (ELA) was commissioned by AJ + C Architects on behalf of Loreto Normanhurst to prepare an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development planning approval for the proposed Loreto Normanhurst School Concept Masterplan, located at 91 – 93 Pennant Hills Road, Normanhurst, NSW. This assessment report has been undertaken to identify any potential Aboriginal objects and other cultural heritage values within the study area, as required under Part 6 of the *National Parks and Wildlife Act 1974*.

The proposed masterplan for Loreto Normanhurst seeks consent for the following works:

- Establishment of 10 new building envelopes across the site for education and ancillary uses including student accommodation;
- Increase of the student number cap by 850 students from 1150 to 2000 students;
- The open space and landscape design;
- Pedestrian and circulation arrangements;
- Associated car parking provisions;
- Construction of a new 3 to 6-storey boarding house to accommodate up to 216 boarders;
- Excavation works to accommodate partially underground carpark and dock facilities within the proposed footprint of the new boarding house facility;
- Demolition works to buildings between Mary Ward and existing dining room building and associated works to make good existing;
- Landscaping works and removal and replacement of approximately 50 trees of varying significance; and
- Augmentation of connection of services and utilities infrastructure.

Aboriginal community consultation was undertaken for the project following the Department of Environment, Climate Change and Water's *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010). The consultation registration process resulted in the registration of 9 different Registered Aboriginal Parties (RAPs) for the project.

A site inspection by ELA Archaeologist Daniel Claggett and Selina Timothy, heritage site officer with the Metropolitan Local Aboriginal Land Council (LALC), identified significant disturbance across the study area in the form of tree clearance, construction of school facilities and infrastructure, and landscaping of where the sporting fields of the school are located. A small portion of surviving and regrowth native vegetation exists in the southern portion of the study area. A majority of the site has been found to be of moderate to high disturbance and coupled with the distance from waterways, therefore to have low Aboriginal archaeological sensitivity. The survey identified the southern woodlands area of the campus as a landscape which could be considered as low to moderate in archaeological potential. However, the only development to take place in this area is the construction of a small chapel. Based on previous land use patterns, aerial imagery and current understanding of Aboriginal artefact distribution in the Cumberland Plain, the proposed construction area for this chapel has been moderately disturbed and it is unlikely that it will impact upon a subsurface archaeological deposit.

Based on the findings of this ACHA and the archaeological investigation the following is recommended:

Recommendation 1 – Works may proceed with caution

General measures will need to be undertaken to ensure unexpected finds of Aboriginal archaeological sites or objects are not harmed. These general measures include:

- Aboriginal objects are protected under the NPW Act regardless if they are registered on AHIMS or not. If suspected Aboriginal objects, such as stone artefacts are located during future works, works must cease in the affected area and an archaeologist called in to assess the finds.
- If the finds are found to be Aboriginal objects, the OEH must be notified under section 89A of the NPW Act. Appropriate management and avoidance or approval under a section 90 AHIP should then be sought if Aboriginal objects are to be moved or harmed.
- In the extremely unlikely event that human remains are found, works should immediately cease and the NSW Police should be contacted. If the remains are suspected to be Aboriginal, the OEH may also be contacted at this time to assist in determining appropriate management

Recommendation 2 – Submit ACHAR to AHIMS

- In accordance with Chapter 3 of the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011) the ACHAR should be submitted for registration on the AHIMS register within three months of completion.

1. Introduction

1.1 Background

Eco Logical Australia (ELA) was commissioned by AJ + C Architects on behalf of Loreto Normanhurst to prepare an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development planning approval for the proposed Loreto Normanhurst School Concept Masterplan, located at 91 – 93 Pennant Hills Road, Normanhurst, NSW. This assessment report has been undertaken to identify any potential Aboriginal objects and other cultural heritage values within the study area, as required under Part 6 of the *National Parks and Wildlife Act 1974*.

The proposed masterplan for Loreto Normanhurst seeks consent for the following works:

- Establishment of 10 new building envelopes across the site for education and ancillary uses including student accommodation;
- Increase of the student number cap by 850 students from 1150 to 2000 students;
- The open space and landscape design;
- Pedestrian and circulation arrangements;
- Associated car parking provisions;
- Construction of a new 3 to 6-storey boarding house to accommodate up to 216 boarders;
- Excavation works to accommodate partially underground carpark and dock facilities within the proposed footprint of the new boarding house facility;
- Demolition works to buildings between Mary Ward and existing dining room building and associated works to make good existing;
- Landscaping works and removal and replacement of approximately 50 trees of varying significance; and
- Augmentation of connection of services and utilities infrastructure.

Plans of the proposed works has been provided by AJ + C Architects (Figure 2).

1.2 Location of the proposed works

The study area consists of 27 individual lots that encompass the Loreto Normanhurst School in Normanhurst, NSW, which falls within the boundaries of Hornsby Shire Council Local Government Area (LGA), Parish of Hornsby, County of Cumberland (Figure 1).

1.3 Purpose and aims

According to the Office of Environment and Heritage (OEH) the investigation and assessment of Aboriginal cultural heritage is undertaken to explore the harm of a proposed activity on Aboriginal objects and declared Aboriginal places and to clearly set out which impacts are avoidable and which are not. Harm to significant Aboriginal objects and declared Aboriginal places should always be avoided wherever possible. Where such harm cannot be avoided, proposals that reduce the extent and severity of this harm should be developed.

This ACHA has been carried out in accordance with the guidelines outlined in the OEH's *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011). This ACHA presents the results of the assessment and recommendations for actions to be taken before, during and after the activities to manage and protect Aboriginal objects and declared Aboriginal places identified by the investigation and assessment.

1.4 Authorship

This ACHA has been prepared by Daniel Claggett, Archaeologist with ELA, with review by Tyler Beebe, ELA Senior Archaeologist.

Daniel Claggett has an MA (Maritime Archaeology) from Flinders University. Tyler Beebe has an MA (Cultural and Environmental Heritage) from Australian National University and a BA (*cum laude*) Anthropology from Hamline University, USA.



Figure 1: The study area

MAJOR PROJECTS OF THE LORETO NORMANHURST MASTERPLAN

SITE A
Boarding, dining, parking, dock, kitchen

SITE B
Upgrade Mary Ward building to
accommodate either 50 year 12
boarders new lift

SITE C
Remove dock to create new courtyard

SITE D
Early Learning Centre

SITE E
Primary School

SITE F
All weather field
Under ground car park
Facilities management (possible location)

SITE G
Mount Pleasant Pavilion
Stadium
Function centre
Facilities management (possible
location) or ECO centre (possible location)

SITE H
Relocate main reception
Relocate staff and administration
Increase interface between staff
and students

SITE I
New three court gym
Multi-use hall

SITE J
Secondary School expansion

SITE K
Reduce roadways within campus
Create new paths
Create new landscape including
new "Garden Plaza"

SITE L
Secondary School expansion

SITE M
Future development to be determined
Under ground car park

SITE N
Gonzaga Barry Centre auditorium
Amphitheatre
ECO centre (possible location)

SITE O
Bush chapel
Bush recreational facilities

SITE P
Upgrade aquatic centre



LORETO NORMANHURST - PROPOSED SITE PLAN - MASTERPLAN 2047

Figure 2: Proposed works

1.5 Statutory control and development context

1.5.1 National Parks and Wildlife Act 1974 (NSW)

Aboriginal cultural heritage in NSW is afforded protection under the provisions of the NSW *National Parks and Wildlife Act 1974* [NPW Act]. The Act is administered by the OEH which has responsibilities under the legislation for the proper care, preservation and protection of 'Aboriginal objects' and 'Aboriginal places'.

Under the provisions of the NPW Act, all Aboriginal objects are protected irrespective of their level of significance or issues of land tenure. Aboriginal objects are defined by the Act as any deposit, object or material evidence (that is not a handicraft made for sale) relating to Aboriginal habitation of NSW, before or during the occupation of that area by persons of non-Aboriginal extraction (and includes Aboriginal remains). Aboriginal objects are limited to physical evidence and may be referred to as 'Aboriginal sites', 'relics' or 'cultural material'. Aboriginal objects can include scarred trees, artefact scatters, middens, rock art and engravings, as well as post-contact sites and activities such as fringe camps and stockyards. The OEH must be notified on the discovery of Aboriginal objects under section 89A of the NPW Act.

Part 6 of the NPW Act provides specific protection for Aboriginal objects and places by making it an offence to destroy, deface, damage, or move them from the land. The *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010c) as adopted by the *National Parks and Wildlife Regulation 2009* (NPW Regulation) made under the NPW Act, provides guidance to individuals and organisations to exercise due diligence when carrying out activities that may harm Aboriginal objects. This Code also determines whether proponents should apply for consent in the form of an AHIP under section 90 of the Act. This code of practice can be used for all activities across all environments. The NPW Act provides that a person who exercises due diligence in determining that their actions will not harm Aboriginal objects has a defence against prosecution for the strict liability offence if they later unknowingly harm an object without an AHIP. However, if an Aboriginal object is encountered in the course of an activity work must cease and an application should be made for an AHIP.

The *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a) assists in establishing the requirements for undertaking test excavation as a part of archaeological investigation without an AHIP, or establishing the requirements that must be followed when carrying out archaeological investigation in NSW where an application for an AHIP is likely to be made.

The OEH recommends that the requirements of this Code also be followed where a proponent may be uncertain about whether or not their proposed activity may have the potential to harm Aboriginal objects or declared Aboriginal places.

AHIMS database

The Aboriginal Heritage Information Management System (AHIMS) is a statutory register managed by the OEH under section 90Q of the NPW Act. The AHIMS manages information on known Aboriginal sites, including objects as defined under the Act.

1.5.2 Heritage Act 1977 (NSW)

The *Heritage Act 1977* (NSW) is a statutory tool designed to conserve the environmental heritage of NSW and is used to regulate development impacts on the state's heritage places, buildings, works, relics, moveable objects or precincts that are important to the people of NSW. These include items of Aboriginal and non-Aboriginal heritage significance. Where these items have particular importance to the state of NSW, they are listed on the State Heritage Register (SHR).

Identified heritage items may be protected by means of either Interim Heritage Orders (IHO) or by listing on the SHR. Proposals to alter, damage, move or destroy places, buildings, works, relics; moveable objects or precincts protected by an IHO or listed on the SHR require an approval under section 60.

Archaeological features and deposits are afforded statutory protection by the 'relics provision section 139^[1] of the Act (as amended in 1999). Under this section it is illegal to disturb or excavate any land knowing or suspecting that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed. In such cases, an excavation permit under section 140 is required. Note that no formal listing is required for archaeological relics; they are automatically protected if they are of local significance or higher.

Heritage registers

The Heritage Branch of the OEH maintains registers of heritage sites that are of State or local significance to NSW. The SHR is the statutory register under Part 3A of the *Heritage Act 1977* (NSW). The State Heritage Inventory (SHI) is an amalgamated register of items on the SHR, items listed on LEPs and/or on a State Government Agency's Section 170 register and may include items that have been identified as having state or local level significance. If a particular site does not appear on either the SHR or SHI this does not mean that the site does not have heritage significance as many sites within NSW have not been assessed to determine their heritage significance. Sites that appear on either the SHR or SHI have a defined level of statutory protection.

Key Aboriginal sites, including post contact sites, can be protected by inclusion on the SHR. The Heritage Council nominates sites for consideration by the Minister for Environment and Heritage.

1.5.3 Environmental Planning and Assessment Act 1979 (NSW)

The *Environmental Planning and Assessment Act 1979* (NSW) [EP&A Act] requires that consideration is given to environmental impacts as part of the land use planning process. In NSW, environmental impacts are interpreted as including cultural heritage impact. Proposed activities and development are considered under different parts of the EP&A Act, including:

- Major projects (State Significant Development under Part 4.1 and State Significant Infrastructure under Part 5.1), requiring the approval of the Minister for Planning.
- Minor or routine developments, requiring local council consent, are usually undertaken under Part 4. In limited circumstances, projects may require the Minister's consent.
- Part 5 activities which do not require development consent. These are often infrastructure projects approved by local councils or the State agency undertaking the project.

The EP&A Act also controls the making of environmental planning instruments (EPIs) such as Local Environmental Plans (LEPs) and State Environmental Planning Policies (SEPPs). LEPs commonly identify and have provisions for the protection of local heritage items and heritage conservation areas.

Local Environmental Plans (LEPs) are prepared by local councils to guide planning and management decisions in the Local Government Areas (LGAs) and establish the requirements for the use and development of land. The study area falls within the Hornsby LEP 2013. This document contains provisions to conserve and protect cultural heritage resources, with specific reference to Aboriginal cultural heritage and historical heritage.

1.5.4 Environment Protection and Biodiversity Conservation Act 1999 (Cth)

The Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (Cth) [EPBC Act] establishes a process for assessing the environmental impact of activities and developments where 'matters of national environmental significance' (MNES) may be affected.

The EPBC Act defines 'environment' as both natural and cultural environments and therefore includes Aboriginal cultural heritage.

Under Part 9 of the EPBC Act, any action that is likely to have a significant impact on a matter of National Environmental Significance (known as a controlled action under the Act), may only progress with approval of the Commonwealth Minister for the Department of Sustainability, Environment, Water, Population and Communities (SEWPaC), now the Department of Environment.

The EPBC Act defines 'environment' as both natural and cultural environments and therefore includes Aboriginal and non-Aboriginal historic cultural heritage items. Under the Act protected heritage items are listed on the National Heritage List (items of significance to the nation) or the Commonwealth Heritage List (items belonging to the Commonwealth or its agencies). These two lists replaced the Register of the National Estate (RNE). The RNE has been suspended and is no longer a statutory list however, it remains as an archive.

1.5.5 Hornsby DCP 2013 Section 9 – Heritage

The study area is located in the Hornsby Shire LGA and as a result the Hornsby Development Control Plan 2013 Section 9 – Heritage is relevant to this site. Section 9.5 states that any one proposing to carry out an activity that may harm an Aboriginal object or a declared Aboriginal place must investigate, assess and report on the harm (being to destroy, deface, damage or move an object from the land) that maybe caused by the activity proposed.

There are no specific controls listed for the study area regarding Aboriginal heritage. However, Section 9.5 of the Hornsby DCP 2013 provides general guidelines for development of land that may contain an Aboriginal relic or place of significance. Prescriptive measures include:

- a. An assessment of Aboriginal heritage should accompany any development application on lands that contain culturally modified trees or recorded Aboriginal objects.
- b. An assessment of Aboriginal heritage should accompany any development application for work to land that has not been disturbed and is:

- within 200 metres of waterways;
 - located within a sand dune system;
 - located on a ridge top, ridge line or headland;
 - located within 200 metres below or above a cliff face; or
 - within 20 metres of or in a cave, rock shelter or a cave mouth.
- e. When an assessment of Aboriginal heritage is required, a report should be prepared in accordance with published best practice guidelines and submitted with the Development Application. This should include an Aboriginal Heritage and Information Management System certificate for property that contains listed objects/ sites.
 - f. Works, including landscaping and associated elements, should be located away from sites and potential sites containing archaeological relics.
 - g. The depth and extent of excavation should be minimised where land contains, or is likely to contain, archaeological remains or relics.

1.5.6 Heritage Database Searches

Searches of the Australian Heritage Database, the State Heritage Register (SHR) and Hornsby Local Environmental Plan (LEP) 2013 utilising the terms “Normanhurst, NSW”, and “Hornsby, NSW” were conducted on 02 October 2018 in order to determine if any places of archaeological significance are located within the study area.

There are no places on the Australian Heritage Database or the State Heritage Register of archaeological significance within the site boundaries. One locally listed item on the Hornsby LEP 2013 Schedule 5 (the Loreto Convent Group – grounds, gates and cemetery, item no: 607) is located within the study area boundaries.

A separate assessment for historical archaeology has been prepared by ELA that discusses this heritage item, the potential impact the proposed works will have on it and the archaeological values of the study area (ELA 2018).

Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)

The purpose of the *Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)* [Heritage Protection Act] is the preservation and protection from injury or desecration of areas and objects in Australia and in Australian waters that are of particular significance to Aboriginal people in accordance with Aboriginal tradition.

Under the Heritage Protection Act the responsible Minister can make temporary or long-term declarations to protect areas and objects of significance under threat of injury or desecration. In certain circumstances the Act can override state and territory provisions, or it can be implemented in circumstances where state or territory provisions are lacking or are not enforced. The Act must be invoked by or on behalf of an Aboriginal or Torres Strait Islander or organisation.

2. Description of the area

2.1 Soil types and landforms

The study area is located along the western margin of the Hornsby Plateau. In general, the Hornsby Plateau is comprised of low rolling and steep hills, with moderately inclined slopes of 10-15 degrees, and is the dominant landform element of the region. The Glenorie soil landscape is underlain by Wianamatta Group Ashfield Shale and Bringelly Shale Formations. Ashfield Shale is comprised of laminate and dark grey shale. Bringelly Shale consists of shale, calcareous claystone, laminate, fine to medium grained lithic quartz (Chapman and Murphy 1989).

The soil landscapes within the study area are of the Glenorie and Hawkesbury soil landscapes. The Glenorie soil landscape occurs north of the Parramatta River on the Hornsby Plateau. Glenorie soils generally consist of shallow to moderately deep red, brown and yellow podzolic soils. Soil fertility and soil drainage are low and the erosional susceptibility Glenorie soils is generally high (Chapman and Murphy 1989).

The Hawkesbury Sandstone landscape occurs within the slopes and ridges of the Macdonald Ranges, Hornsby Plateau and Hawkesbury Valleys. Soils are generally shallow, with the A horizon made up of either a loose, coarse quartz sand, an earthy, yellowish-brown clay loam or a pale light clay pedalled with peds 20 to 60 mm in size (Figure 3).

The study area is situated approximately 130 m north of the second-order section of Coups Creek, and approximately 300 m east of a first-order section of Coups Creek. A small section of first-order waterway enters the study area for approximately 10 m and is located approximately 130 m from where any proposed developments are to take place. Aerial imagery from 1943 suggests that this first-order waterway may have been artificially extended to run further into the Loreto campus and serve as a drainage channel for past agricultural practices where the modern-day school sports fields are located (Figure 4).

White and Macdonald (2010) conducted a study focused on confirming the link between water sources and Aboriginal archaeological sites. The study determined that generally, sites are located within 50 - 100 m of fourth-order water courses, and within 50 m of second-order water courses. First-order water courses did not appear to have any effect on site distribution. First and second-order waterways experience intermittent flow following rain events only, with either little or no drainage channels, flow or free-standing pools after a rain event. These first-order streams would have been a focus of human activity at intermittent times through the year, dependant on rainfall. However, due to their intermittent nature and the distance between the streams and the study area, it is unlikely that these waterways have had any significant impact on artefact distribution within the site.

2.2 Ethnohistoric context

Regional History

Dates of the earliest occupation of the continent by Aboriginal people are subject to continued revision as more research is undertaken. The earliest undisputed radiocarbon date from the region comes from a rock shelter site north of Penrith on the Nepean, known as Shaws Creek K2, which has been dated to 14,700 +/- 250 BP (Attenbrow 2002).

However, dates of more than 40,000 years have been claimed for artefacts found in gravels of the Cranebrook Terrace on the Nepean River and have indicated the potential early Aboriginal occupation of the Sydney region (Nanson *et al.* 1987; Stockton 1993; Stockton & Holland 1974).

Determining the population of Aboriginal people at the time of European contact is notoriously difficult. Firstly, Aboriginal people were mobile and largely avoided contact with Europeans. Further, many Aboriginal people perished from introduced diseases such as smallpox, as well as violent clashes with early settlers, so the population statistics gathered in the colony's early years may not be reliable. Population estimates for the greater Sydney region, including the lower Blue Mountains, generally range from 4,000 – 8,000 at the time of European contact. The western Cumberland Plain population specifically, has been estimated to be between 500 – 1,000 people at that time, which translates to an approximate minimum population density of 0.5 people / km (Kohen 1995).

At the time of European settlement, the Cumberland Plain was thought to be close to the intersection of a number of language group (tribal) boundaries. There is considerable debate over the extent and nature of territorial boundaries in the Sydney Basin. This is due in part to the absence of ethnographic and linguistic study at the time of contact and the scarcity of adequate historical documentation and anthropological interest until well after settlement of the region (McDonald 2007). The linguistic evidence from the Sydney region indicates the presence of five discrete language groups at European contact (Capell 1970, Dawes 1970, Mathews 1897, 1901, Matthews and Everitt 1900, Threlkeld in Fraser 1892, Tindale 1974, Troy 1990). As the evidence is sketchy, there are conflicting views on how it can be interpreted.

Local History

The Hornsby Shire area was originally inhabited by members of the Dharug, Ku-ring-gai and Darkinjung Aboriginal language groups. European settlement within the Hornsby Shire area began in the early 19th century, with land along the Parramatta and Hawkesbury rivers being the first areas settled due to their desirable conditions. Following the arrival of Europeans to the Sydney basin the a small-pox outbreak killed many Aboriginal people, causing them to move away from their traditional clan boundaries. New European land grants and land use practices such as clearing and fencing irrevocably changed the access to resources and the traditional pattern of life for Aboriginal people.

The Loreto Normanhurst area was originally part of 320 acres officially granted to Constable Samuel Henry Horne in 1831. Access to the wider area was virtually impossible for the early settlers and explorers due to a lack of roads and the heavily timbered land. Timber-getters explored, harvested and cleared the area and opened it up for farming and cultivation, in particular for the establishment of orchards from as early as the 1820s.

The original large grants of land were subdivided into smaller parcels of land suitable for farming from the 1850s and by the 1860s much of the land in the area had been cleared and was farmed (Perumal Murphy Alessi 2008).

Normanhurst was originally known as Hornsby after the name Samuel Horne gave his property. The construction of the Main Northern and North Shore railway lines in the 1890s brought about a name change. The residents of the area raised £100 to cover the full cost of the platform and on 21 November 1895 it was opened and named Hornsby, which was noted to have been a source of confusion to locals, as the next station to the north was known as Hornsby Junction. The name was changed to Normanhurst not long after, and the surrounding area was named after the station.

Horne's land was subdivided into smaller blocks in 1857 and 1864. The school grounds are part of what was Lots 4 and 5 of the estate and by 1875 the property was owned by Oliver Osborn, Orchardist and one of the early pioneers of the Hornsby area. The property known as Mount Pleasant Estate was subdivided after Osborn's death in 1890. In 1896 the Trustees of the Institute of the Blessed Virgin Mary (IBVM) purchased 22 acres of vacant land formerly part of Osborn's Mount Pleasant Estate. The foundation stone for the new convent was laid on 28 February 1897 by Cardinal Moran. By the end of 1897, a substantial building had been constructed on the land and the school opened late in 1897 as "Loreto Convent, Hornsby" with 15 boarders (Perumal Murphy Alessi 2008). The cemetery in the southern portion of the site was established just after the opening of the school as the resting place for member of the IBVM.



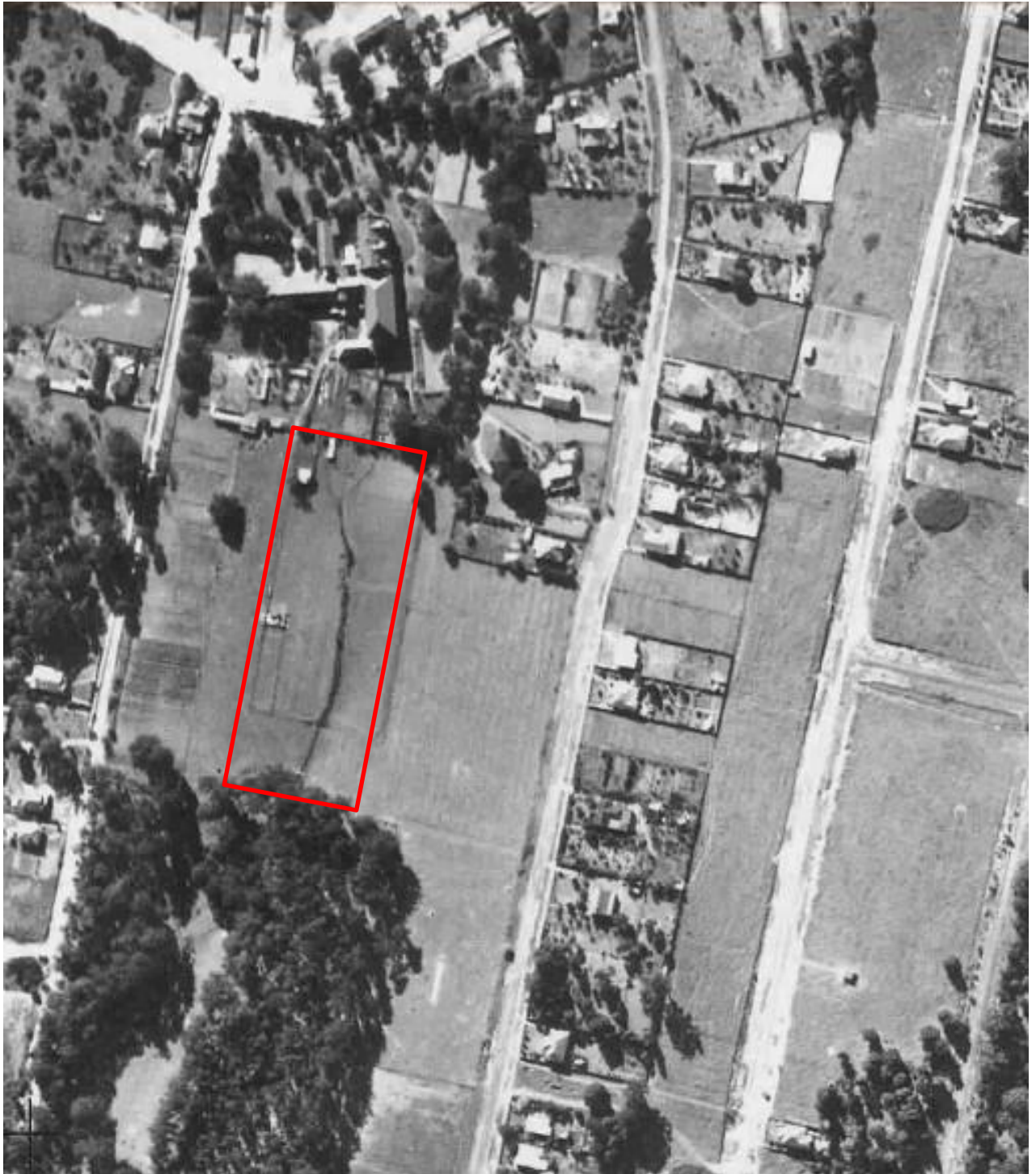


Figure 4: 1943 aerial imagery of the study area, with the first-order drainage line running through agricultural land outline in red

2.3 Landform elements

Landform elements fall into morphological types as sketched in Figure 5 and Figure 6. The ten types defined in the Australian Soil and Land Survey Field Handbook (CSIRO 2009) are:

- Crest (C);
- Hillock (H);
- Ridge (Ridge);
- Simple slope (S);
- Upper slope (U);
- Mid-slope (M);
- Lower slope (L);
- Flat (F);
- Open depression (vale) (V); and
- Closed depression (D).

Crests and depressions form the highest and lowest parts of the terrain. They are defined (CSIRO 2009) as follows:

Crest: Landform element that stands above all, or almost all, points in the adjacent terrain. It is characteristically smoothly convex upwards in downslope profile or in contour, or both. The margin of a crest element should be drawn at the limit of observed curvature.

Depression: Landform element that stands below all, or almost all, points in the adjacent terrain. A closed depression stands below all such points; an open depression extends at the same elevation, or lower, beyond the locality where it is observed. Many depressions are concave upwards and their margins should be drawn at the limit of observed curvature.

Landform elements that are slopes are treated as if each element is straight, and meets another slope element at a slope break. Four morphological types are distinguished on their position in a toposequence relative to crests, flats (defined below) and depressions:

Simple slope: Slope element adjacent below a crest or flat and adjacent above a flat or depression.

Upper slope: Slope element adjacent below a crest or flat but not adjacent above a flat or depression.

Mid-slope: Slope element not adjacent below a crest or flat and not adjacent above a flat or depression.

Lower slope: Slope element not adjacent below a crest or flat but adjacent above a flat or depression.

Flats are defined (CSIRO 2009) as follows:

Flat: planar landform element that is neither a crest nor a depression and is level or very gently inclined (<3% tangent approximately)

Several types of landform feature have crests and adjoining slopes that are so small that a 20 m radius site would usually include both. Two compound morphological types are distinguished by the relative length of the crest:

Hillock: Compound landform element comprising a narrow crest and short adjoining slopes, the crest length being less than the width of the landform element.

Ridge: compound landform element comprising a narrow crest and short adjoining slopes, the crest length being greater than the width of the landform element.

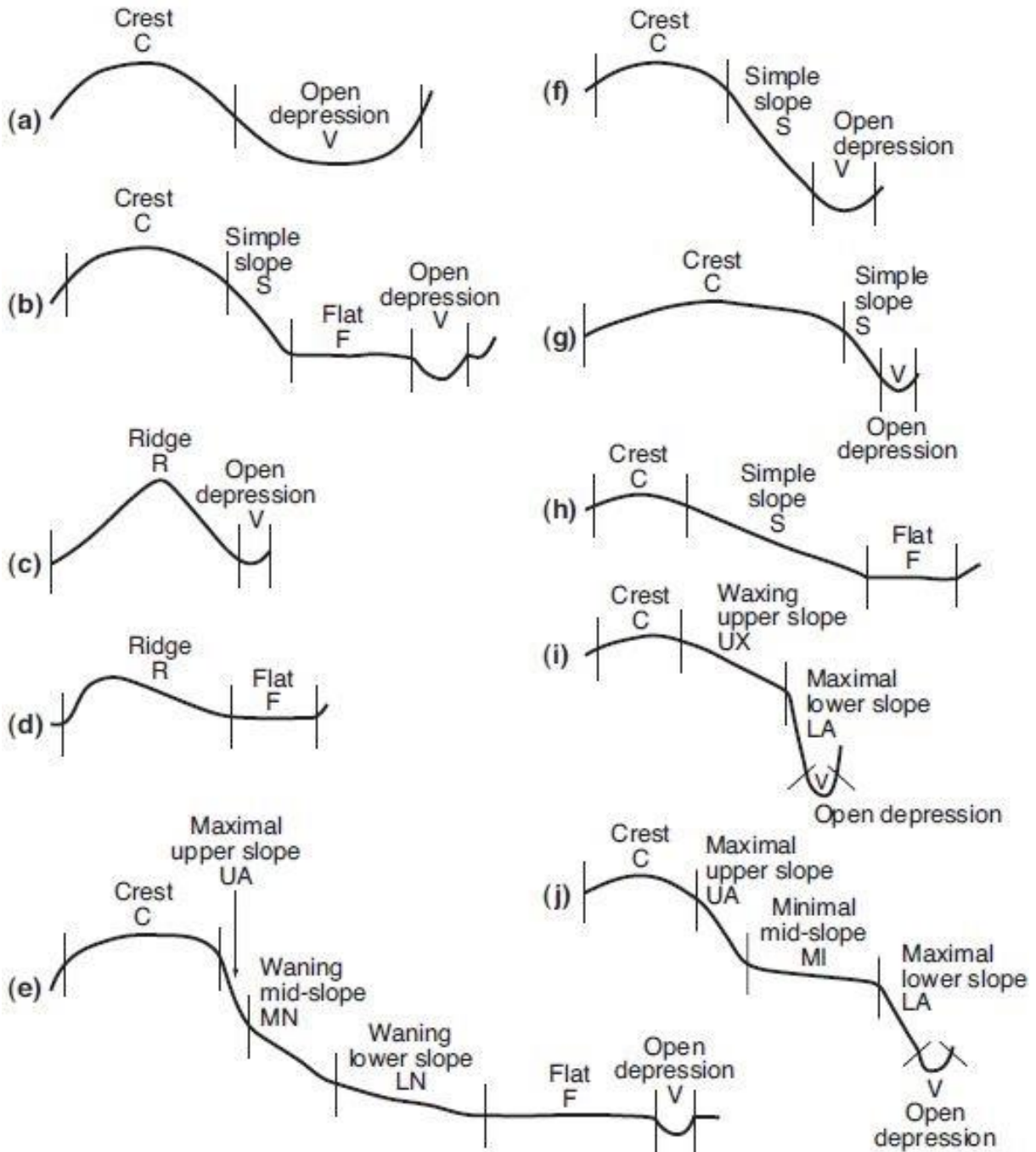


Figure 5: Reproduced from the *Australian Soil and Land Survey Field Handbook* (CSIRO 2009). Examples of profiles across terrain divided into morphological types of landform element. Note that the boundary between crest and slope elements is at the

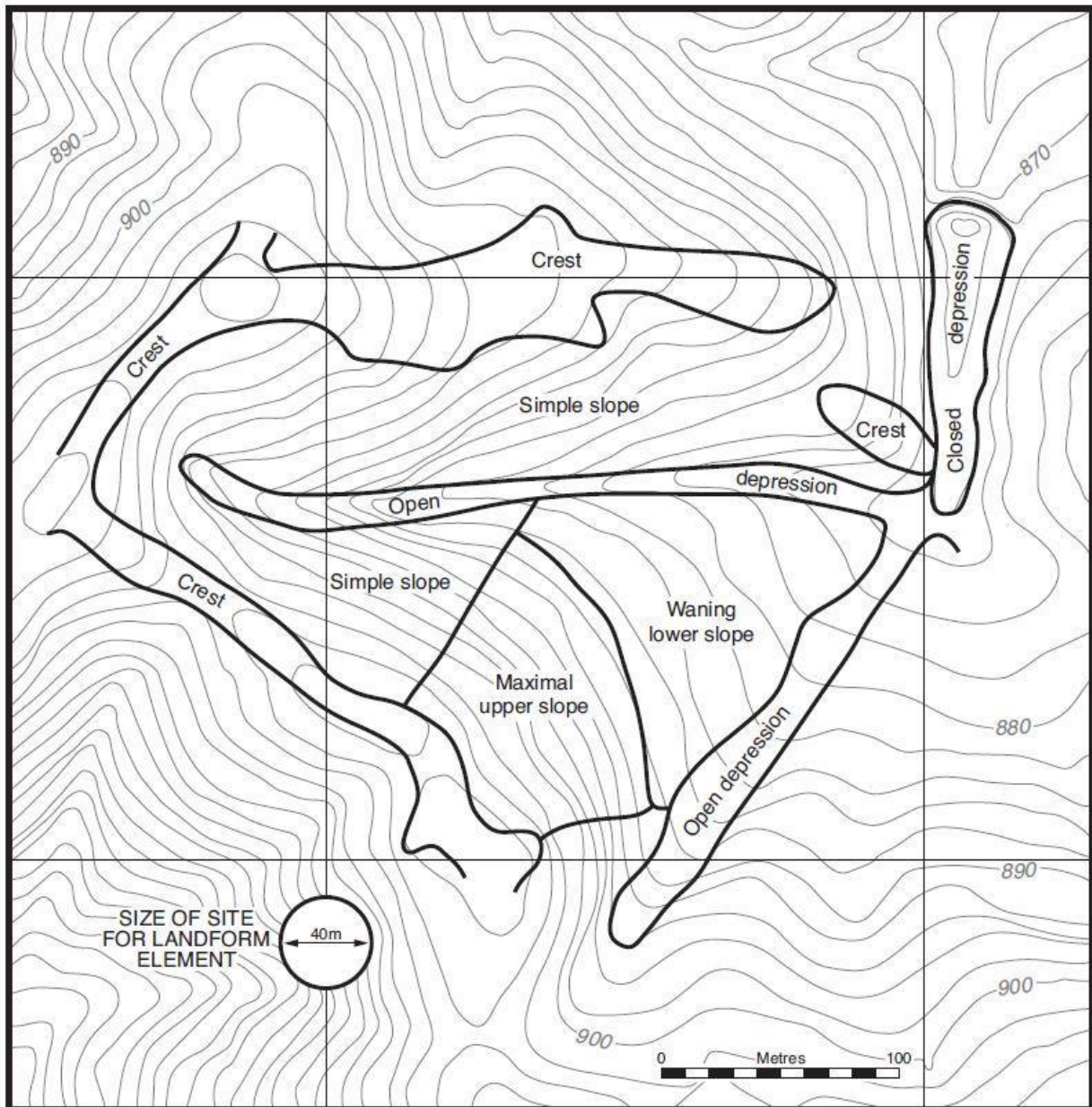


Figure 6: Reproduction from the *Australian Soil and Land Survey Field Handbook* (CSIRO 2009). A landform pattern of rolling low hills mapped into morphological types of landform element. Note that the crests and depressions in this case are mainly narrower than the recommended site size.

A majority of the study area consists of a heavily disturbed landscape. Disturbed land is defined in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* as land that has “*been the subject of a human activity that has changed the land’s surface, being changes that remain clear and observable*” (DECCW 2010). Past activities that have caused ground disturbance in the study area include land clearance, levelling of the landscape to create the school sports fields and construction of school facilities and associated infrastructure.

The remainder of the study area is made up of a lower hill slope landform. This area consists of the remnant and regrowth woodland in the south west of the study area. The landform in this area has been influenced by the presence of Coups Creek to the south and the unnamed first-order creek line that enters the south east corner of the study area (Figure 7).

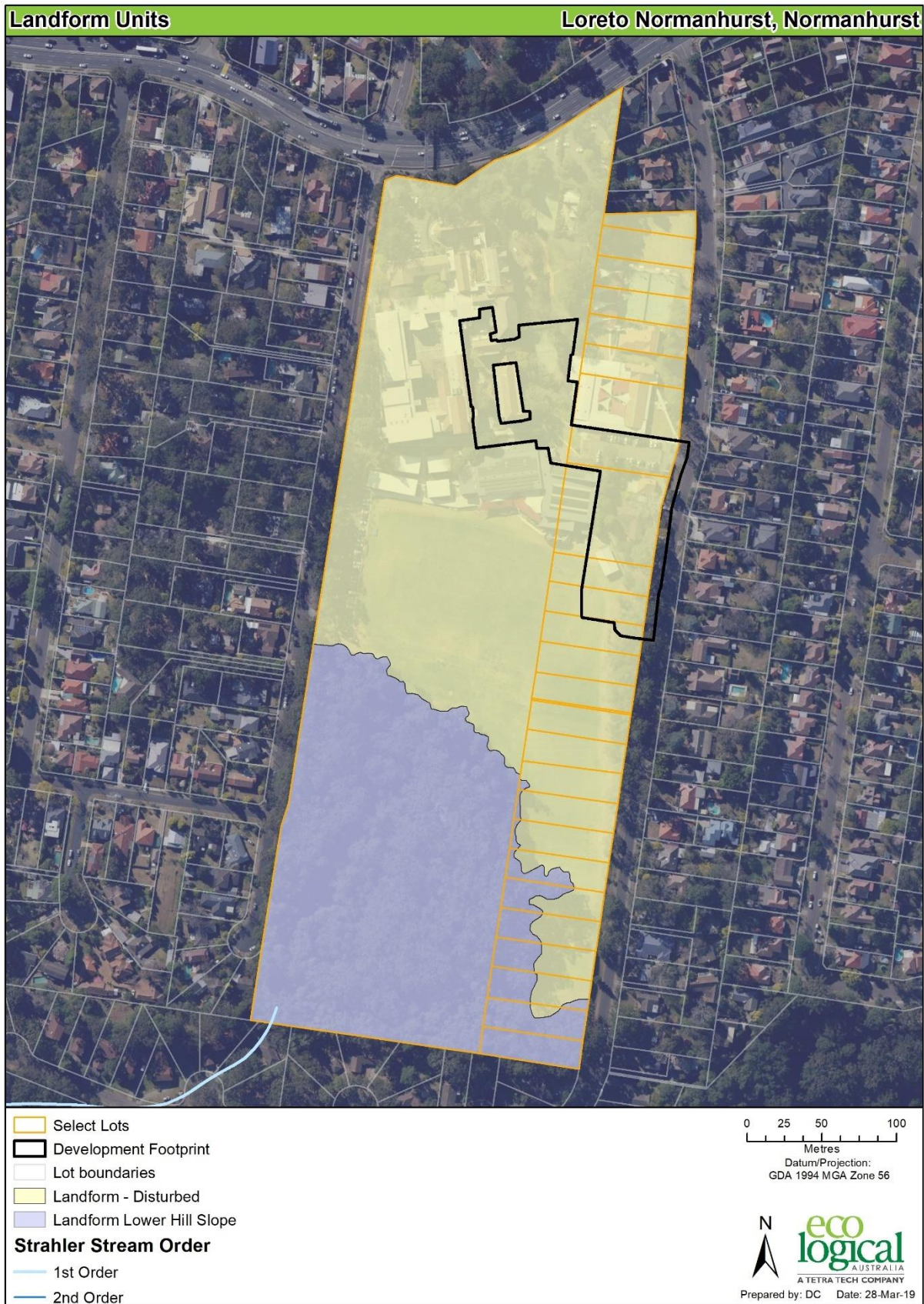


Figure 7: Landform units that make up the study area

3. Consultation

As part of the ACHA for the proposed works, Aboriginal consultation has been undertaken and is ongoing following the Aboriginal Cultural Heritage Consultation Requirements for Proponents' (DECCW 2010b) guidelines.

Consultation with registered Aboriginal parties for this Aboriginal cultural heritage assessment has been conducted in line with the OEH's *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010b). This has ensured that Aboriginal stakeholders have been able to register and therefore be fully engaged on all aspects relating to cultural heritage for this project.

The OEH consultation requirements follow four clear consultation stages. The following chapter outlines the process ELA used to fully consult with Aboriginal people on this development proposal.

3.1 Stage 1 – Notification of project proposal and registration of interest

3.1.1 Placement of advertisement in local newspaper

An advertisement was placed in the Hornsby Advocate on 21 March 2019 inviting interested Aboriginal stakeholders to register to be consulted in relation to the proposed works (**Appendix A**).

3.1.2 Written request for information about Aboriginal organisations

ELA on behalf of the proponent undertook a registration process for Aboriginal people with knowledge of the area. ELA wrote to the following organisations (as per section 4.1.2 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents' guidelines* (DECCW 2010b) on 12 March 2019, in order to identify Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects:

- The relevant OEH regional office (Regional Operations Group, Metropolitan Department of Planning and Environment)
- The Metropolitan Local Aboriginal Land Council
- The Registrar, Aboriginal Land Rights Act 1983
- The National Native Title Tribunal
- Native Title Services Corporation Limited (NTSCORP Limited)
- Hornsby Shire Council
- Greater Sydney Local Land Services

Details of the letters and organisational responses are included in **Appendix A**.

3.1.3 Letters to Aboriginal organisations

As per 4.1.3 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents' guidelines* (DECCW 2010b), ELA wrote to the Aboriginal organisations identified through the above process on 15 March 2019, inviting them to register an interest in the project. The registration closing date was set as 4 April 2019.

Details of the letters, advertisement, and responses are included in **Appendix A**.

Registrants became the Registered Aboriginal Parties (RAPs) for the project. Table 1 below details the RAPs for the project.

Table 1: Registered Aboriginal Parties

Organisation	Contact Name
Amanda Hickey Cultural Services	Amanda Hickey
Goodradigbee Cultural & Heritage Aboriginal Corp	Caine Carroll
Tocomwall	Scott Franks
A1 Archaeological Services	Carolyn Hickey
Goobah Developments	Basil Smith
Ngambaa Cultural Connections	Karina Slater
Barking Owl Aboriginal Corporation	Jody Kulakowski
Darug Land Observations	Jamie & Anna Workman
Wailwan Aboriginal Group	Philip Boney

Section 4.1.4 of the DECCW's Aboriginal cultural heritage consultation requirements for proponents 2010 only requires a minimum of 14 days for Aboriginal stakeholders to register their interest to be consulted for an ACHA. However, it has always and will continue to be ELA's policy to register all individuals/groups regardless of the mandatory closing date of registration.

3.2 Stage 2 and Stage 3 - Presentation of information about the proposed project and gathering information about cultural significance

3.2.1 Project information and methodology

Table 2: Draft methodology response

Aboriginal Organisation	Draft Methodology Response
Barking Owl Aboriginal Corporation	Supports the methodology
Darug Land Observations	Supports the methodology

3.2.2 Archaeological Survey

The archaeological survey was undertaken on 21 January 2019 by ELA archaeologist Daniel Claggett, with Selina Timothy, heritage sites officer from the Metropolitan Local Aboriginal Land Council (LALC).

The survey identified high disturbance across most of the study area, with low to moderate archaeological potential identified within an area of remnant and regrowth native vegetation in the study area's south. Further details of the archaeological survey can be found in **Section 4.3** of this ACHA.

3.3 Stage 4 – Review of draft cultural heritage report

A copy of the draft ACHAR was provided to Aboriginal stakeholders on 13 May 2019 for a 28 day review and comment period. During the response period no Aboriginal parties elected to respond to the draft

report. The full consultation log with ELA actions and responses from Aboriginal parties can be found in **Appendix A** of this report.

4. Summary and analysis of background information

4.1 AHIMS sites

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) database was conducted 02 October 2018 covering the following area (**Appendix A**).

GDA94, Zone 56

Eastings: 323810 - 323870

Northings: 6266397 - 6266563

A total of five AHIMS sites and zero Aboriginal Places were identified during this search (Figure 8). A breakdown by site feature is presented in Table 3 below.

Table 3: Types of Aboriginal sites recorded within approximately 1 km of the AHIMS search area

Site feature	Number of sites	Percentage of all sites
Artefact	5	100%
Total number of sites	5	100%

There are no AHIMS sites located within or adjacent to the study area boundary.

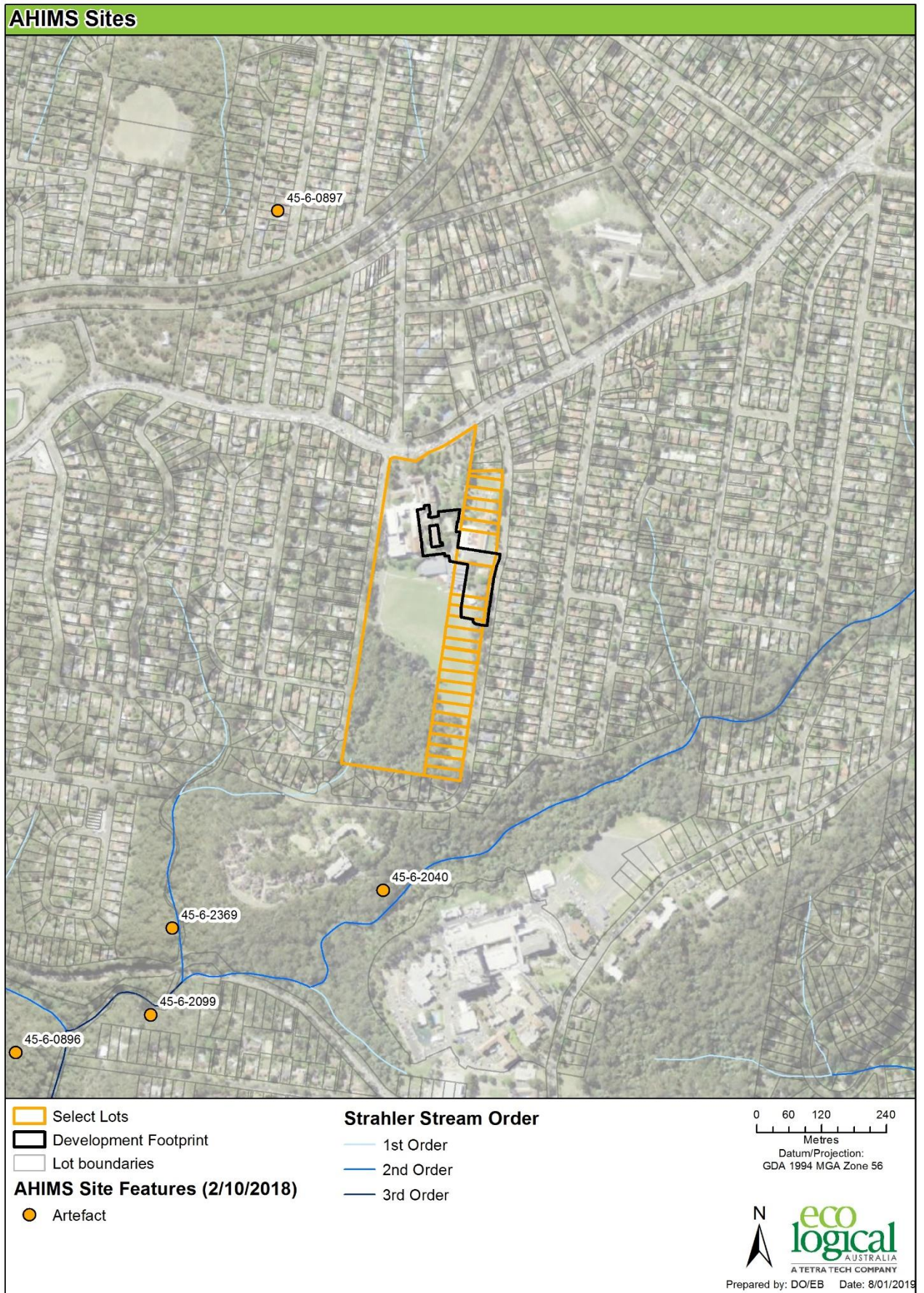


Figure 8: AHIMS sites within 3.5 km of the study area

4.1.1 Previous archaeological studies – Regional

The greater Sydney region contains several thousand recorded Aboriginal sites (AHIMS), with new sites being recorded constantly as a result of archaeological investigations as a component of the environmental approvals process for new development, as well as academic studies. The studies carried out over these past few decades of development provide a broad picture of the archaeological context of the Cumberland Plains. Early archaeological work in the region (such as Dallas 1989a; Haglund 1980; Kohen 1986; Smith 1989 and Kohen's 1986) established predictive models for Cumberland Plain site patterning based on the notion that there is an almost continuous scatter of artefactual material across the landscape. A small number of test excavations have been carried out as a result of sites identified from previous archaeological surveys (Corkill & Edgar 1991; English & Gay 1994; Haglund 1989). The results of these studies show that the dominant archaeological resource of the area consists of low-density stone artefact scatters across all landforms, with some evidence for the presence of higher density stone artefact scatters (indicating longer and more intense occupation) associated with water sources.

More recent works have contributed to refining these models (AMBS 2000a, 2002; ENSR 2009, Jo McDonald Cultural Heritage Management [JMCHM] 1997, 1999, 2001a; McDonald 1999). McDonald (1999) posited that most areas of the Cumberland Plain contain subsurface archaeological material irrespective of ground surface manifestations, and that the complexity of the archaeological record was far greater than previously identified on the basis of surface recording. Studies have demonstrated that the average ratio of subsurface artefacts to those found at surface could be 25:1, with more recent work indicating this could be as much as 2,000:1 in some locations (JMCHM 2001a).

4.1.2 Previous archaeological studies - Local

There have been several Aboriginal archaeological studies conducted in the Hornsby LGA and surrounding LGA's over the last two decades. A majority of these studies have focussed on historical archaeology, but despite the widespread disturbance and development of the area, a number of Aboriginal sites have survived due to the sensitive nature of the landscape, which includes sandstone outcroppings and the presence of major waterways. A summary of recent Aboriginal heritage studies and their findings is presented in Table 4 below.

Table 4: Heritage studies conducted within the North Sydney area

Title	Summary
Appleton, J. (2001) The archaeological investigation of the site of a proposed subdivision Lot 14 DP 815922, Hornsby, North of Sydney, NSW	Appleton (2001) was commissioned to conduct an archaeological investigation for a proposed subdivision at Lot 14, DP 815922 at Arrianga Place in Hornsby, located approximately 3.5 km north of the current study area. An Aboriginal site consisting of four grinding grooves was identified in an unnamed creek line running through the study area. Appleton concluded that the grinding grooves possessed low scientific and low research significance. Due to its cultural value however, it was recommended that the site be avoided during works and protected from impacts.

Title	Summary
Cosmos Archaeology (2004) Precinct 6, B2-B3 Freeway Corridor, Wahroonga, NSW: Archaeological Assessment	Cosmos Archaeology (2004) was commissioned by Glendinning Minto & Associates to assess a 5.2 ha section of the abandoned B2-B3 Freeway corridor to the east of the current study area to allow for the residential development of Wahroonga Estate. No new Aboriginal sites were identified during the survey, and it was concluded that the area assessed was of low archaeological sensitivity and potential, due primarily to the topography of the area being steep terrain with limited access to a water source.
AMBS (2009) Wahroonga Estate Redevelopment Heritage Impact Assessment	<p>Australian Museum Business Services (2009) was commissioned by Johnson Property Group Pty Ltd to provide heritage advice and field survey of an area of the proposed Wahroonga Estate residential redevelopment would be built on, located north-east of the current study area.</p> <p>Initial assessment of the area suggested low potential for the site, as other archaeological assessments within 2-3km of the study area tended to find little or no evidence of Aboriginal occupation.</p> <p>It was determined that this is likely to be a reflection of the early urban development of the inland area of North Sydney (including Wahroonga) which would have precluded the preservation of sites and the necessity for archaeological assessment, rather than an indication of less intense Aboriginal occupation of the area.</p> <p>No new Aboriginal sites were located during this survey. However, a previously registered Aboriginal site was identified as being directly adjacent to the redevelopment (AHIMS number: #45-6-2040) and located along the bank of nearby Coups Creek. The study concluded that the redevelopment would leave the nearby creek line area undisturbed, but if it is determined that development encroaches into these areas, additional consultation and archaeological assessment would be required.</p>
Artefact Heritage (2015) Hornsby Junction Remodelling and Commuter Car Park – Review of Environmental Factors	<p>Artefact Heritage, on behalf of Transport for NSW, undertook an Aboriginal Heritage Due Diligence Assessment to support the redevelopment of Hornsby Junction and railway station in Hornsby, NSW. No previously registered AHIMS sites were identified within 1.2 km of the study area, and no new sites were registered by Artefact Heritage. The study area was considered to be significantly disturbed by the construction and maintenance of the railway station and surrounding buildings, and the entire landscape had been heavily modified. No further assessment was deemed necessary and general mitigation methods were recommended to the proponent.</p>
AECOM Australia (2015) Hornsby Quarry: Road Construction Spoil Management Project Technical working paper: Aboriginal heritage	<p>AECOM Australia was previously commissioned by The NSW Roads and Maritime Services (RMS) to undertake Aboriginal heritage investigations as part of an Environmental Impact Statement (EIS) for road construction spoil processing at Hornsby Quarry, located approximately 3 km north of Loreto Normanhurst.</p> <p>No previously registered Aboriginal sites were identified as being within the study area, with the closest AHIMS site approximately 410 m north of Hornsby Quarry. Additionally, no new Aboriginal sites or areas of archaeological sensitivity were identified within the quarry site. However, one sandstone overhang with a PAD area was identified 120 m south of the study area and deemed to be archaeologically sensitive.</p> <p>Although it was determined the proposed works within Hornsby Quarry would be unlikely to impact the sandstone overhang, AECOM recommended mitigation methods be put in place if the proposed works came within 200 m of the sandstone overhang. Recommendations included temporary measures such as fencing to clearly mark off the area as sensitive. If it was determined that impact was likely to occur to the sandstone overhang and PAD, AECOM recommended test excavation take place within the PAD prior to works commencing.</p>

4.1.3 Previous archaeological research and studies – within the study areas

Perumal Murphy Alessi. 2008 *Conservation Management Plan, Loreto Normanhurst Nos. 91-93 Pennant Hills Road, Normanhurst*. Prepared for Loreto Normanhurst.

Perumal Murphy Alessi were engaged to assess the cultural significance of the buildings and features currently occupying Loreto Normanhurst and to guide future works, to ensure that the heritage value of the place is maintained and enhanced. The study found that due to significant disturbance across the broader school campus, including our current study area, there is little potential for significant archaeological resources. The study found that all areas that had not been developed had been significantly modified in the past.

4.2 Summary

Based on the results of previous studies within the local area, the presence of Aboriginal sites within the North Sydney region is determined by both sensitive landscape features (major waterways and sandstone outcroppings) and the level of disturbance present. The Normanhurst area has been subjected to extensive disturbance associated with the early development of Sydney, reducing the potential for Aboriginal sites to have survived. However, areas nearby major waterways or within sandstone outcroppings still have the potential to possess Aboriginal sites and artefacts.

4.3 Field Survey

Pedestrian survey of the entire study area was undertaken by ELA Archaeologist Daniel Claggett and Selina Timothy, heritage site officer with Metropolitan LALC, on 21 January 2019.

4.3.1 Survey methods

The field survey employed the following methods:

- A pedestrian survey method was employed. The field team members were spaced approximately 5 m apart where possible, which gave good coverage. The team used a meander technique in the built-up areas of the site and followed access pathways in the southern woodlands area. Areas of higher ground surface visibility and exposures were closely inspected.
- The methodology for recording any identified Aboriginal sites and / or PADs within the project area were recorded using a GPS and photographed, details were recorded using standardised recording forms based on the Code of Practice requirements.
- Any new Aboriginal sites would require the completion of an Aboriginal heritage site recording form (AHIMS Site Card) as mandatory under s89A of the NPW Act.
- Notes were taken on identified landforms, areas of archaeological sensitivity, vegetation coverage, land use and disturbance activities which formed the basis of the field notes for the survey.
- Any cultural information, information about Aboriginal resources or comments made by the Aboriginal representative involved in the field survey on the management of cultural values of the project area was noted and recorded.

In accordance with the OEH the study area was surveyed according to survey units, landforms, and landscapes. All survey units are described in Table 5 and Table 6.

Table 5: Survey coverage

Survey Unit (SU)	Landform	Survey Area (m ²)	Unit (SUA) %	Visibility (V) %	Exposure (E) %	Effective coverage (ECA)	Effective coverage area	Effective coverage %
1	Disturbed	81,500	10	20		1,630		2
2	Lower hill slope	47,500	20	30		2,850		6

Table 6: Landform summary - sampled area

Landform	Landform Area	Area effectively surveyed	% of landform effectively surveyed	Number of sites	Number of artefacts or features
Disturbed	81,500 m ²	1,630	2%	0	0
Lower hill slope	47,500 m ²	2,850	6%	0	0

4.3.2 Findings

No Aboriginal sites or objects were located during the site inspection. No culturally modified scarred trees were identified during the field survey. A majority of the vegetation that remains in the study area consists primarily of regrowth from logging activity conducted in the past. Along with younger regrowth vegetation, there is also some remnant vegetation present throughout the southern portion of the study area. Parts of the waterway seen in 1943 aerial imagery were identified during survey of the southern area, with the waterway appearing to have partially dried up and been overgrown by vegetation.

The study area was found to be subject to varying levels of soil disturbance. The majority of the area where the construction of the Loreto Normanhurst School Complex will take place is already heavily disturbed from the construction of campus buildings (Figure 9, Figure 10, Figure 11), vegetation clearance and landscaping associated with the school sports fields (Figure 12, Figure 13). The woodland area in the south is less disturbed, with the most visible disturbance associated with the clearing of walking trails (Figure 14, Figure 15), the construction of the cemetery (Figure 16) and areas previously cleared and modified for lumber and agricultural activity, as seen in 1943 imagery of the area. The woodlands area is made up by a combination of mature growth vegetation (Figure 17) and younger regrowth vegetation (Figure 18), which makes up most of the vegetation in this area, reflecting these past logging activities. Traces of the first order waterway that is visible in 1943 imagery were identified (Figure 19), along with a modern, artificial drainage line near the southern boundary of the study area (Figure 20).

Based on research into historic land use within the study area and the site inspection, it appears that there were a range of disturbance levels within the southern portion of the study area, with a moderately disturbed landscape identified within the area that will be impacted by the proposed construction of the chapel.

4.3.3 Survey coverage

Survey coverage varied across the study area due to exposures and surface disturbances from grading and other soil disturbance. Within the Loreto Normanhurst campus, surface exposure was limited to lawns and garden areas within the campus and the school sports fields, with the rest of the surface area comprised of concrete and asphalt.

Surface exposure within the southern woodlands area was low, ranging between 20-30%. Soil surface exposure was restricted primarily to the cleared walking trails that run throughout the area.



Figure 9: The campus boarding school, facing north



Figure 10: Driveway leading to the primary school building, facing north



Figure 11: Loreto Normanhurst campus, with the boarding school to the right, facing northwest



Figure 12: Eastern edge of the school sports field, facing north



Figure 13: School sports field and aquatic centre, facing northwest



Figure 14: Walking trail in the woodland area, facing south



Figure 15: Walking trail, facing west



Figure 16: Graveyard in the southern woodlands, facing south



Figure 17: Mature regrowth trees within the southern woodlands, facing west



Figure 18: Young regrowth vegetation, facing southeast



Figure 19: A heavily vegetated section of the waterway seen in 1943 imagery, facing southwest



Figure 20: Modern drainage line in the southwest corner of the study area, facing east

5. Cultural heritage values and statement of significance

The *Australia ICOMOS Burra Charter 1999* provides guidance for the assessment, conservation and management of places of cultural significance. Cultural significance is defined in the Burra Charter as ‘a concept which helps in estimating the value of places’. The places that are likely to be of significance are those which help an understanding of the past or enrich the present, and which will be of value to future generations” (ICOMOS Burra Charter 1988:12). The Burra Charter provides a definition of cultural significance as “aesthetic, historic, scientific, social or spiritual value for past, present or future generations”. Aboriginal cultural heritage sites can be assessed through the application of these five principle values.

- Social or cultural value (assessed only by Aboriginal people);
- Historical value;
- Scientific/archaeological value (assessed mostly by archaeologists/heritage consultants);
- Aesthetic value;
- Spiritual value.
- This section presents an assessment of Aboriginal cultural heritage values based on these principles.

5.1 Description of cultural heritage values

The review of background information and information gained through consultation with Aboriginal people should provide insight into past events. These include how the landscape was used and why the identified Aboriginal objects are in this location, along with contemporary uses of the land. The following descriptions of cultural heritage values are drawn from the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011).

Social or cultural value refers to the spiritual, traditional, historical or contemporary associations and attachments the place or area has for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them.

Historic value refers to the associations of a place with a historically important person, event, phase or activity in an Aboriginal community. Historic places do not always have physical evidence of their historical importance (such as structures, planted vegetation or landscape modifications). They may have ‘shared’ historic values with other (non-Aboriginal) communities and include places of post-contact Aboriginal history.

Scientific (archaeological) value refers to the importance of a landscape, area, place or object because of its rarity, representativeness and the extent to which it may contribute to further understanding and information (Australian ICOMOS 1988).

Aesthetic value refers to the sensory, scenic, architectural and creative aspects of the place. It is often closely linked with the social values. It may consider form, scale, colour, texture and material of the fabric or landscape, and the smell and sounds associated with the place and its use (Australian ICOMOS 1988).

Spiritual value is a more recent inclusion in the Burra Charter, dating from 1999. Australia ICOMOS has not defined this value.

5.2 Aboriginal Cultural Values Assessment

5.2.1 Social significance

Aboriginal cultural values can only be determined through consultation with the Aboriginal community. All Aboriginal sites are considered to have cultural significance to the Aboriginal community as they provide physical evidence of past Aboriginal use and occupation of the area. Aboriginal cultural significance may include social, spiritual, historic and archaeological values, and is determined by the Aboriginal community.

No cultural values were identified within the study area by the RAPs during the draft ACHA comment period.

5.2.2 Aesthetic significance

As noted above aesthetic significance is often closely linked to social and cultural significance. Generally aesthetic significance is considered to mean the visual beauty of a place. Examples of archaeological sites that may have high aesthetic values include rock art sites or sites located in visually pleasing environments (NSW NPWS 1997: 11).

The site does not appear to meet this criterion.

5.2.3 Historic significance

No historic associations with 'place' were identified during the course of the background research and field survey.

The site does not appear to meet this criterion.

5.2.4 Scientific significance

As with cultural, historic, and aesthetic significance; scientific significance can be difficult to establish. Certain criteria must therefore be addressed in order to assess the scientific significance of archaeological sites. Scientific significance contains four subsets; research potential, representativeness, rarity and educational potential. These are outlined below.

Research Potential: is the ability of a site to contribute to our understanding of Aboriginal occupation locally and on a regional scale. The potential for the site to build a chronology, the level of disturbance within a site, and the relationship between the site and other sites in the archaeological landscape are factors which are considered when determining the research potential of a site.

The site does not appear to meet this criterion.

Representativeness: is defined as the level of how well or how accurately something reflects upon a sample. The objective of this criterion is to determine if the class of site being assessed should be conserved in order to ensure that a representative sample of the archaeological record be retained. The conservation objective which underwrites the 'representativeness' criteria is that such a sample should be conserved (NSW NPWS 1997: 7-9).

The site does not appear to meet this criterion.

Rarity: This criterion is similar to that of representativeness, it is defined as something rare, unusual, or uncommon. If a site is uncommon or rare it will fulfil the criterion of representativeness. The criterion of rarity may be assessed at a range of levels including local, regional, state, national and global (NSW NPWS 1997: 10).

The site does not appear to meet this criterion.

Educational Potential: This criterion relates to the ability of the cultural heritage item or place to inform and/or educate people about one or other aspects of the past. It incorporates notions of intactness, relevance, interpretative value and accessibility. Where archaeologists or others carrying out cultural heritage assessments are promoting/advocating the educational value of a cultural heritage item or place it is imperative that public input and support for this value is achieved and sought. Without public input and support the educative value of the items/places is likely to not ever be fully realised (NSW NPWS 1997: 10).

The site does not appear to meet this criterion.

5.2.5 Spiritual significance

The site does not appear to meet this criterion.

5.3 Statement of significance

The study area contained zero Aboriginal archaeological sites as defined under the *National Parks and Wildlife Act 1974*.

Site inspection identified a majority of the study area as having been disturbed. This disturbance has been caused by the construction of buildings, roads and infrastructure on the main campus of Loreto Normanhurst and by cutting and filling of the sporting fields / grassland areas of the site. The southern woodlands area of the campus has been determined to possess low to moderate archaeological potential. However, the only development to take place in this area is the construction of a small chapel. Previous land use patterns in the area of the chapel construction site includes land clearance and ground disturbance, which was identified in aerial imagery and during survey. Additionally, this area is located within the upper reaches of a first-order waterway, considered to have no influence on artefact distribution by current landscape modelling (White and Macdonald 2010). This evidence suggests that proposed construction area for this chapel has been moderately to highly disturbed and it is unlikely that it will impact upon a subsurface archaeological deposit.

Based on the nature of the proposed works, it is unlikely any impact upon a subsurface archaeological deposit will occur. These disturbance findings are consistent with the Conservation Management Plan prepared by Perumal Murphy Alessi Heritage Consultants (2008). There is no requirement for further archaeological assessment within the study area.

6. Development proposal activity

6.1 Overview

Loreto Normanhurst is proposing the redevelopment of the Loreto Normanhurst school campus which will involve the demolition and construction of buildings across study area. Activities associated with the proposed works includes demolition, construction, landscape modifications and bulk earthworks.

It has been assessed that the proposed development will not impact any Aboriginal heritage sites.

6.2 Consideration of Ecologically Sustainable Development

6.2.1 Principles of ESD

Ecological Sustainable Development (ESD) is defined by the Australian Government as 'using, conserving and enhancing the community's resources so that ecological processes, on which life depends, are maintained, and the total quality of life, now and in the future, can be increased' (Australian Government, Department of the Environment and Energy website).

ESD is contained in both Commonwealth (EPBC Act 1999) and NSW statutes. Section 6 (2) of the *Protection of the Environment Administration Act 1991* (NSW) lists the principals of ESD as:

- a. the precautionary principle—namely, that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.

In the application of the precautionary principle, public and private decisions should be guided by:

- i careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment, and
- ii an assessment of the risk-weighted consequences of various options,
- b. inter-generational equity—namely, that the present generation should ensure that the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations,
- c. conservation of biological diversity and ecological integrity—namely, that conservation of biological diversity and ecological integrity should be a fundamental consideration,
- d. improved valuation, pricing and incentive mechanisms—namely, that environmental factors should be included in the valuation of assets and services, such as:
 - i polluter pays—that is, those who generate pollution and waste should bear the cost of containment, avoidance or abatement,
 - ii the users of goods and services should pay prices based on the full life cycle of costs of providing goods and services, including the use of natural resources and assets and the ultimate disposal of any waste,
 - iii environmental goals, having been established, should be pursued in the most cost-effective way, by establishing incentive structures, including market mechanisms, that enable those best placed to maximise benefits or minimise costs to develop their own solutions and responses to environmental problems.

6.3 Cumulative Impact Assessment

Cumulative impact of any development on Aboriginal sites assesses the extent of the proposed impact on the site and how this will affect both the proportion of this type of Aboriginal site in the area and the impact this destruction will have on Aboriginal cultural heritage values generally in the area. For example, if an artefact scatter is destroyed in the course of a proposed development, how many site artefact scatters are likely to remain in that area and how will the destruction of that site affect the overall archaeological evidence remaining in that area. If a site type that was once common in an area becomes rare, the loss of that site (and site type) will affect our ability to understand past Aboriginal land uses, will result in an incomplete archaeological record and will negatively affect intergenerational equity.

6.3.1 Effect on the proportion of this Type of Aboriginal Site in the Area

One method of calculating the proportion of this site type remaining in the area is to use the results of an AHIMS search. A search covering a 1 km² area resulted in the identification of five (5) AHIMS sites. None of the AHIMS sites identified are within or adjacent to the study area.

The proposed works to be completed within the study area will impact on zero Aboriginal sites.

7. Avoiding and or mitigating harm

The ACHA has identified that zero Aboriginal heritage sites will be harmed by the proposed development. No archaeological mitigation measures are required.

8. Management recommendations

Based on the findings of this ACHA and the archaeological investigation the following is recommended:

Recommendation 1 – Works may proceed with caution

General measures will need to be undertaken to ensure unexpected finds of Aboriginal archaeological sites or objects are not harmed. These general measures include:

- Aboriginal objects are protected under the NPW Act regardless if they are registered on AHIMS or not. If suspected Aboriginal objects, such as stone artefacts are located during future works, works must cease in the affected area and an archaeologist called in to assess the finds.
- If the finds are found to be Aboriginal objects, the OEH must be notified under section 89A of the NPW Act. Appropriate management and avoidance or approval under a section 90 AHIP should then be sought if Aboriginal objects are to be moved or harmed.
- In the extremely unlikely event that human remains are found, works should immediately cease and the NSW Police should be contacted. If the remains are suspected to be Aboriginal, the OEH may also be contacted at this time to assist in determining appropriate management

Recommendation 2 – Submit ACHAR to AHIMS

- In accordance with Chapter 3 of the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011) the ACHAR should be submitted for registration on the AHIMS register within three months of completion.

References

- AECOM Australia 2015. *Hornsby Quarry Road Construction Spoil Management Project – Appendix J: Stage 2 Aboriginal Cultural Heritage Assessment*. Prepared for the NSW Roads and Maritime Services.
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- Chapman, G. A. and Murphy, C.L. (1989), *Soil landscapes of the Sydney 1:100000 sheet*. Soil Conservation Service of N.S.W., Sydney.
- Cosmos Archaeology. 2004 *Precinct 6, B2-B3 Freeway Corridor, Wahroonga, NSW: Archaeological Assessment*. Prepared for Glendinning Minto & Associates on behalf of the Australasian Conference Association and the Seventh Day Adventist Community.
- Department of Environment, Climate Change and Water (DECCW), 2010b. *Aboriginal cultural heritage consultation requirements for proponents 2010*. Hurstville, NSW.
- Department of Environment, Climate Change and Water (DECCW), 2010. *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*, Hurstville, NSW.
- Department of Environment, Climate Change and Water (DECCW), 2010. *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW*, Hurstville, NSW.
- Eco Logical Australia, 2018. *Loreto Normanhurst Historical Archaeological Assessment – Masterplan*. Prepared for AJ + C Architects on behalf of Loreto Normanhurst.
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- Perumal Murphy Alessi. 2008 *Conservation Management Plan, Loreto Normanhurst Nos. 91-93 Pennant Hills Road, Normanhurst*. Prepared for Loreto Normanhurst.
- Total Earth Care 2007. *126 Greville Street, Chatswood West: Aboriginal Heritage and Archaeological Assessment*. Prepared for EDAW Pty Ltd.

Transport for NSW. 2015 *Hornsby Junction Remodelling and Commuter Car Park – Review of Environmental Factors*.

White, B. and J. McDonald. 2010 Lithic Artefact Distribution in the Rouse Hill Development Area, Cumberland Plain, New South Wales. *Australian Archaeology*, 70:pp. 29-39.

Appendix A Consultation Log

Date	Action	Organization
12/03/2019	ELA wrote to OEH requesting contact information on any Aboriginal People with an interest in the proposed project/ Holding cultural knowledge of the project area	Office of Environment and Heritage (OEH)
12/03/2019	ELA wrote to Metropolitan LALC (CEO) requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area. We also invited them to register their interest in the project.	Metropolitan LALC
12/03/2019	ELA wrote to ORALRA requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area.	Officer of the Registrar of Aboriginal Land Right Act (ORALRA)
12/03/2019	ELA wrote to NTS Corp requesting contact information on any Aboriginal People with an interest in the proposed project/ holding cultural knowledge of the project area.	Native Title Service Corporation (NTS Corp)
12/03/2019	ELA wrote to NNTT requesting contact information on any Aboriginal People with an interest in the proposed project/ holding cultural knowledge of the project area.	National Native Title Tribunal (NNTT)
12/03/2019	ELA wrote to Hornsby Shire Council requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area.	Hornsby Shire Council
12/03/2019	ELA wrote to the Greater Sydney Local Land Services (LLS) requesting contact information on any Aboriginal people with an interest in the proposed project or who hold cultural knowledge relevant to the project area.	Greater Sydney Local Land Services
21/03/2019	ELA published a notice of Aboriginal stakeholder consultation for the project in the Hornsby Advocate newspaper.	Hornsby Advocate newspaper ad ran on 21/03/2019
13/03/2019	Notice of Stakeholder consultation invitations	Stakeholder list provided by OEH

Date	Action	Organization
04/04/2019	ELA sent out a draft methodology to all parties	All RAPs
13/05/2019	ELA sent out draft Aboriginal cultural heritage report	All RAPs, no comments were recieved

Organisational responses

date	Action	Organisation
13/03/2019	Provided a list of Aboriginal People with a potential interest in the project.	OEH
13/03/2019	<i>"Records held by the National Native Title Tribunal as at 13 March 2019 indicate that the identified parcels appear to be freehold, and freehold tenure extinguishes native title. The National Native Title Tribunal does not hold data sets for freehold tenure; consequently, we cannot conduct searches over freehold. For confirmation of freehold data, please contact the NSW Land and Property Information office or seek independent legal advice."</i>	National Native Title Tribunal
	No response	Metropolitan LALC
19/03/2019	<i>"We refer to your letter dated 12 March 2019 (Letter) regarding an Aboriginal Cultural Heritage Assessment for the proposed developments at Loreto Normanhurst School, 91-93 Pennant Hills Road, Normanhurst as indicated on the map attached to the Letter. Under Section 170 of the Aboriginal Land Rights Act 1983 the Office of the Registrar is required to maintain the Register of Aboriginal Owners (RAO). A search of the RAO has shown that there are not currently any Registered Aboriginal Owners in the project area. We suggest you contact the Metropolitan Local Aboriginal Land Council on 02 8394 9666 as they may be able to assist you in identifying Aboriginal stakeholders who wish to participate."</i>	Officer of the Registrar of Aboriginal Land Right Act (ORALRA)
	No response	Native Title Service Corporation (NTS Corp)
18/03/2019	<i>Dear Daniel, I refer to your request regarding information on Aboriginal groups in the Hornsby Local Government Area. Please find below information and website links Council has regarding Aboriginal matters. http://www.hornsby.nsw.gov.au/community/services/aboriginal-services Council has a Hornsby Aboriginal and Torres Strait Islander Advisory Committee (HATSIA) which may be able to help with this enquiry re details for the Aboriginal Land Council and groups in the area. The Community Development staff member looking after this committee is Jian Zhao on 98476994. A link to the NSW Aboriginal Land Council is provided below, which provides contact information. http://alc.org.au/land-councils/lalc-boundaries--contact-details.aspx Trusting that this is of assistance.</i>	Hornsby Shire Council
14/03/2018	<i>"We strongly recommend that you make contact with the Office of Environment and Heritage (OEH), Cultural Heritage Division, for all-inclusive contact lists of persons and organisations that may assist with your investigation."</i>	Greater Sydney Local Land Services

Invitations to Aboriginal stakeholders

Date	Contact organisation	Contact Person	Action
15/03/2019	A1 Archaeological Services	Carolyn Hickey	Sent out invitations to RAPS as per OEH list
15/03/2019	Amanda Hickey Cultural Services	Amanda Hickey	Sent out invitations to RAPS as per OEH list
15/03/2019	B.H. Consultants	Ralph & Nola Hampton	Sent out invitations to RAPS as per OEH list
15/03/2019	Barking Owl Aboriginal Corporation	Jody Kulakowski	Sent out invitations to RAPS as per OEH list
15/03/2019	Biamanga	Seli Storer	Sent out invitations to RAPS as per OEH list
15/03/2019	Bilinga	Simalene Carriage	Sent out invitations to RAPS as per OEH list
15/03/2019	Bilinga Cultural Heritage Technical Services	Robert Brown	Sent out invitations to RAPS as per OEH list
15/03/2019	Butucarbin Aboriginal Corporation	Jennifer Beale	Sent out invitations to RAPS as per OEH list
15/03/2019	Callendulla	Corey Smith	Sent out invitations to RAPS as per OEH list
15/03/2019	Darug Boorooberongal Elders Aboriginal Corp	Gordon Workman	Sent out invitations to RAPS as per OEH list
15/03/2019	Darug Land Observations	Jamie & Anna Workman	Sent out invitations to RAPS as per OEH list
15/03/2019	Dharug	Andrew Bond	Sent out invitations to RAPS as per OEH list
15/03/2019	Didge Ngunawal Clan	Lillylea Carroll Paul Boyd	Sent out invitations to RAPS as per OEH list
15/03/2019	DJMD Consultancy	Darren Duncan	Sent out invitations to RAPS as per OEH list
15/03/2019	Ginninderra Aboriginal Corporation	Steven Johnson and Krystle Carroll	Sent out invitations to RAPS as per OEH list
15/03/2019	Goobah Developments	Basil Smith	Sent out invitations to RAPS as per OEH list
15/03/2019	Goodradigbee Cultural & Heritage Aboriginal Corp	Caine Carroll	Sent out invitations to RAPS as per OEH list
15/03/2019	Gulaga	Wendy Smith	Sent out invitations to RAPS as per OEH list
15/03/2019	Gunyyu	Kylie Ann Bell	Sent out invitations to RAPS as per OEH list
15/03/2019	Gunyyu Cultural Heritage Technical Services	Darlene Hoskins- McKenzie	Sent out invitations to RAPS as per OEH list

Date	Contact organisation	Contact Person	Action
15/03/2019	Jerringong	Joanne Anne Stewart	Sent out invitations to RAPS as per OEH list
15/03/2019	Metropolitan LALC	Selina Timothy	Sent out invitations to RAPS as per OEH list
15/03/2019	Munyunga	Kaya Dawn Bell	Sent out invitations to RAPS as per OEH list
15/03/2019	Munyunga Cultural Heritage Technical Services	Suzannah McKenzie	Sent out invitations to RAPS as per OEH list
15/03/2019	Murramarang	Roxanne Smith	Sent out invitations to RAPS as per OEH list
15/03/2019	Murrumbul	Mark Henry	Sent out invitations to RAPS as per OEH list
15/03/2019	Murrumbul Cultural Heritage Technical Services	Levi McKenzie- Kirkbright	Sent out invitations to RAPS as per OEH list
15/03/2019	Nerrigundah	Newton Carriage	Sent out invitations to RAPS as per OEH list
15/03/2019	Ngambaa Cultural Connections	Kaarina Slater	Sent out invitations to RAPS as per OEH list
15/03/2019	Nundagurri	Newton Carriage	Sent out invitations to RAPS as per OEH list
15/03/2019	Pemulwuy CHTS	Pemulwuy Johnson	Sent out invitations to RAPS as per OEH list
15/03/2019	Thauaira	Shane Carriage	Sent out invitations to RAPS as per OEH list
15/03/2019	Thoorga Nura	John Carriage	Sent out invitations to RAPS as per OEH list
15/03/2019	Tocomwall	Scott Franks	Sent out invitations to RAPS as per OEH list
15/03/2019	Wailwan Aboriginal Group	Philip Boney	Sent out invitations to RAPS as per OEH list
15/03/2019	Walbunja	Hika Te Kowhai	Sent out invitations to RAPS as per OEH list
15/03/2019	Walgalu	Ronald Stewart	Sent out invitations to RAPS as per OEH list
15/03/2019	Wingikara	Hayley Bell	Sent out invitations to RAPS as per OEH list
15/03/2019	Wingikara Cultural Heritage Technical Services	Wandai Kirkbright	Sent out invitations to RAPS as per OEH list
15/03/2019	Yerramurra	Robert Parson	Sent out invitations to RAPS as per OEH list
15/03/2019	Badu	Karia Lea Bond	Sent out invitations to RAPS as per OEH list

Date	Contact organisation	Contact Person	Action
15/03/2019	Darug Aboriginal Cultural Heritage Assessments	Celestine Everingham, Gordon Morton	
15/03/2019	Eric Keidge	Eric Keidge	
15/03/2019	Minnamunnung	Aaron Broad	
15/03/2019	Mura Indigenous Corporation	Phillip Carroll	
15/03/2019	Wullung	Lee-Roy James Boota	Sent out invitations to RAPS as per OEH list

Registered Aboriginal Parties

Registered Aboriginal Party	Contact Name	Registration date
Amanda Hickey Cultural Services	Amanda Hickey	15-03-19
Goodradigbee Cultural & Heritage Aboriginal Corp	Caine Carroll	17-03-19
Tocomwall	Scott Franks	18-03-19
A1 Archaeological Services	Carolyn Hickey	18-03-19
Goobah Developments	Basil Smith	19-03-19
Ngambaa Cultural Connections	Kaarina Slater	25-03-19
Barking Owl Aboriginal Corporation	Jody Kulakowski	26-03-19
Darug Land Observations	Jamie & Anna Workman	27-03-19
Wailwan Aboriginal Group	Phil Boney	04-04-19

Responses to draft methodology

Registered Party	Aboriginal	Contact Name	Date Responded	Response
Barking Owl Corporation	Aboriginal	Jody Kulakowski	15-04-19	Supports the methodology
Darug Land Observations		Jamie & Gordon Workman	22-04-19	Supports the methodology

Responses to draft ACHA

Registered Party	Aboriginal	Contact Name	Date Responded	Response
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N/A

No Aboriginal Parties responded during the 28 day draft report response period.

Consultation Stage 1 Detail



Level 3 101 Sussex Street Sydney NSW 2000
t: (02) 9529 3800

12 March 2019

Office of the Registrar
Aboriginal Land Rights Act 1983
PO Box 112, Glebe, NSW 2037
adminofficer@oralra.nsw.gov.au

Attention: Nicole Courtman, Registrar

Dear Nicole,

RE: Aboriginal Cultural Heritage Assessment – Loreto Normanhurst School, Normanhurst, NSW

Eco Logical Australia (ELA) has been engaged by Loreto Normanhurst (C/- AJ + C Architects) to conduct an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development planning approval for the proposed Loreto Normanhurst School Concept Masterplan in Normanhurst, NSW (see Figure 1). Please refer to the bottom of this letter for client contact details.

The proposed masterplan for Loreto Normanhurst seeks consent for the following works:

- Establishment of 10 new building envelopes across the site for education and ancillary uses including student accommodation;
- Increase of the student number cap by 850 students from 1150 to 2000 students;
- The open space and landscape design;
- Pedestrian and circulation arrangements;
- Associated car parking provisions;
- Construction of a new 3 to 6-storey boarding house to accommodate up to 216 boarders;
- Excavation works to accommodate partially underground carpark and dock facilities within the proposed footprint of the new boarding house facility;
- Demolition works to buildings between Mary Ward and existing dining room building and associated works to make good existing;
- Landscaping works and removal and replacement of approximately 50 trees of varying significance; and
- Augmentation of connection of services and utilities infrastructure.

In accordance with the SEARs, the properties that make up the Loreto Normanhurst campus will be subject to an ACHA in support of future approvals. Consultation will be undertaken in line with the Office of Environment and Heritage (OEH) guidelines for *Aboriginal cultural heritage consultation requirements for proponents 2010*. In accordance with the SEARs, proponents must provide the opportunity for Aboriginal people who hold cultural knowledge relevant to the proposed project area to be involved in the assessment process.

As per Section 4.1.2 of the OEH *Aboriginal cultural heritage consultation requirements for proponents* (2010) we would appreciate if you would provide us with a contact list of Aboriginal people registered with your organisation who may hold cultural knowledge relevant to the project area identified above.

The project area falls within the Metropolitan Local Aboriginal Land Council (LALC) and Hornsby Shire Council. ELA will be contacting the Metropolitan LALC directly as part of this consultation.

It would be appreciated if you could provide information on any Aboriginal people or organisations who we should invite to register for consultation. If you have any further questions in relation to the upcoming Aboriginal consultation process I can be contacted on 02 9259 3772. Please forward your response to Daniel Claggett, Level 3, 101 Sussex Street, Sydney NSW 2000 or email daniel.claggett@ecoaus.com.au. I thank you for your attention in this matter.

Regards,



Daniel Claggett
Archaeologist

Client Contact Details
Mark Louw

AJ + C Architects
79 Myrtle Street,
Chippendale NSW 2008
P: 9311 8222

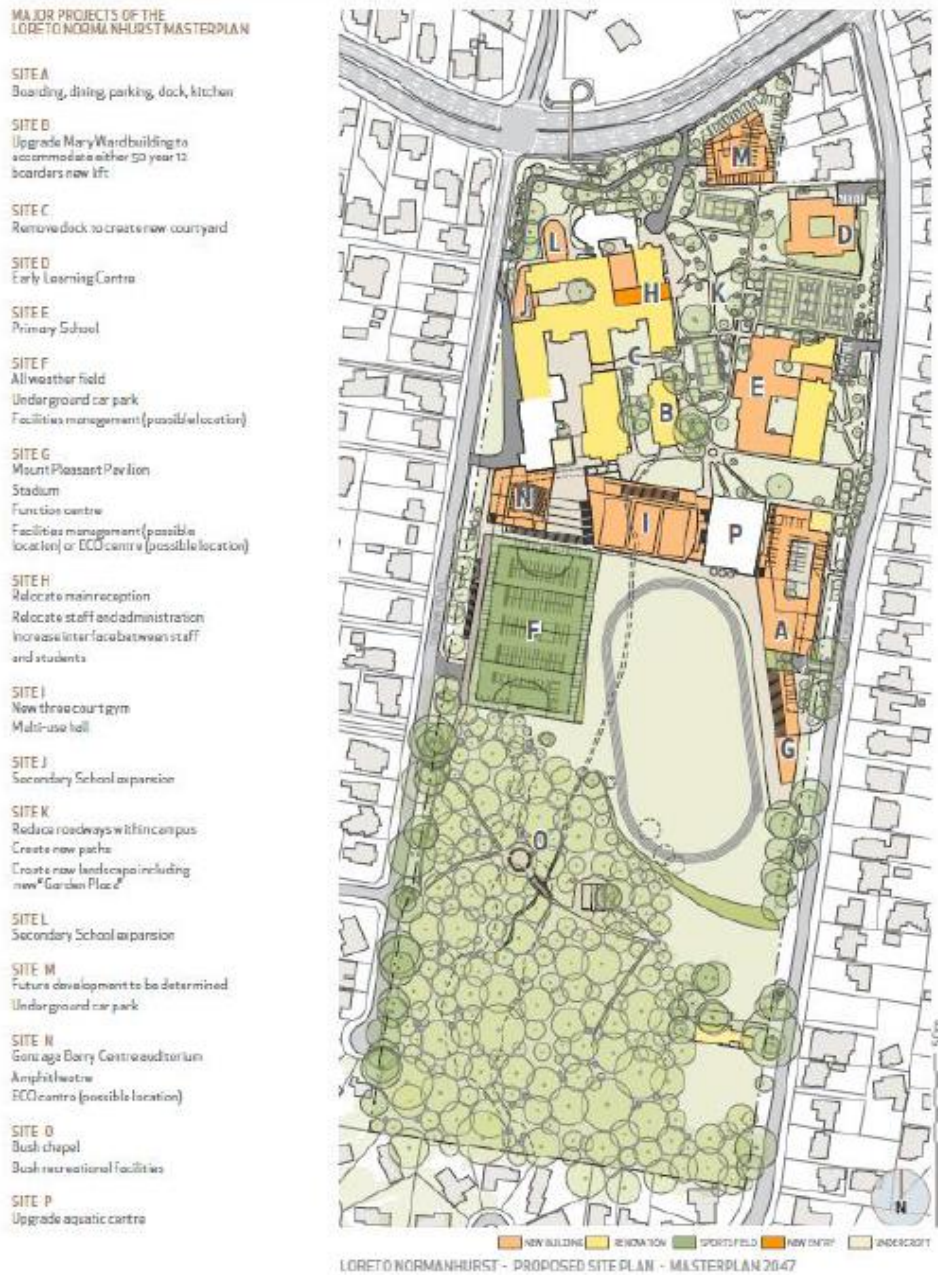


Figure 1: The proposed Loreto Normanhurst Concept Masterplan



Level 3 101 Sussex Street Sydney NSW 2000
t: (02) 9529 3800

12 March 2019

Local Land Services, Greater Sydney

Catchment Management Authority

Level 4, 2-6 Station Street,

Penrith, NSW 2750

gs.service@lls.nsw.gov.au

To Whom It May Concern,

RE: Aboriginal Cultural Heritage Assessment – Loreto Normanhurst School, Normanhurst, NSW

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- Augmentation of connection of services and utilities infrastructure.

In accordance with the SEARs, the properties that make up the Loreto Normanhurst campus will be subject to an ACHA in support of future approvals. Consultation will be undertaken in line with the Office of Environment and Heritage (OEH) guidelines for *Aboriginal cultural heritage consultation requirements for proponents 2010*.

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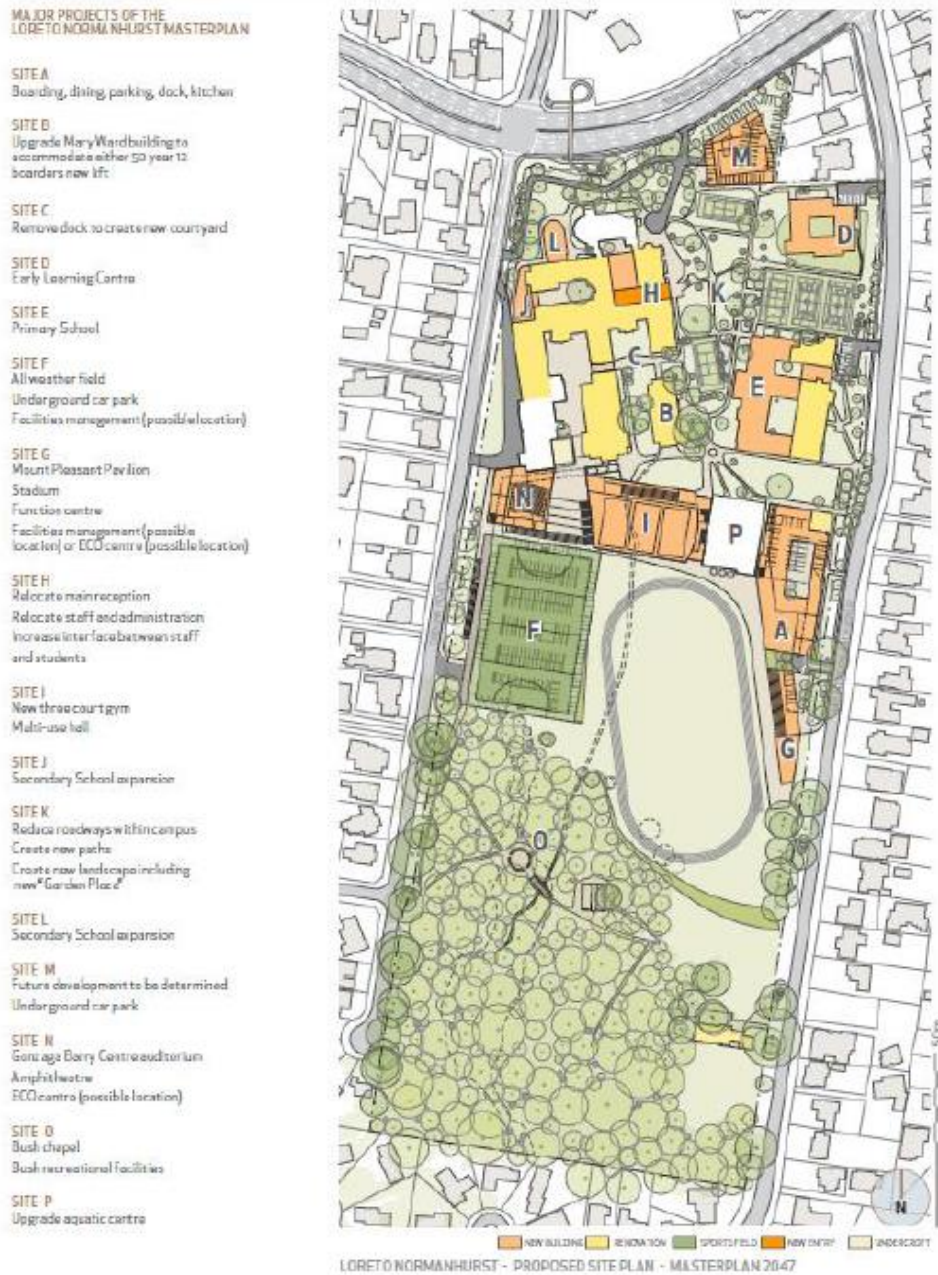


Figure 1: The proposed Loreto Normanhurst Concept Masterplan



Level 3 101 Sussex Street Sydney NSW 2000
t: (02) 9529 3800

12 March 2019

Hornsby Shire Council
296 Peats Ferry Road
Hornsby, NSW
2077
hsc@hornsby.nsw.gov.au

To Whom It May Concern,

RE: Aboriginal Cultural Heritage Assessment – Loreto Normanhurst School, Normanhurst, NSW

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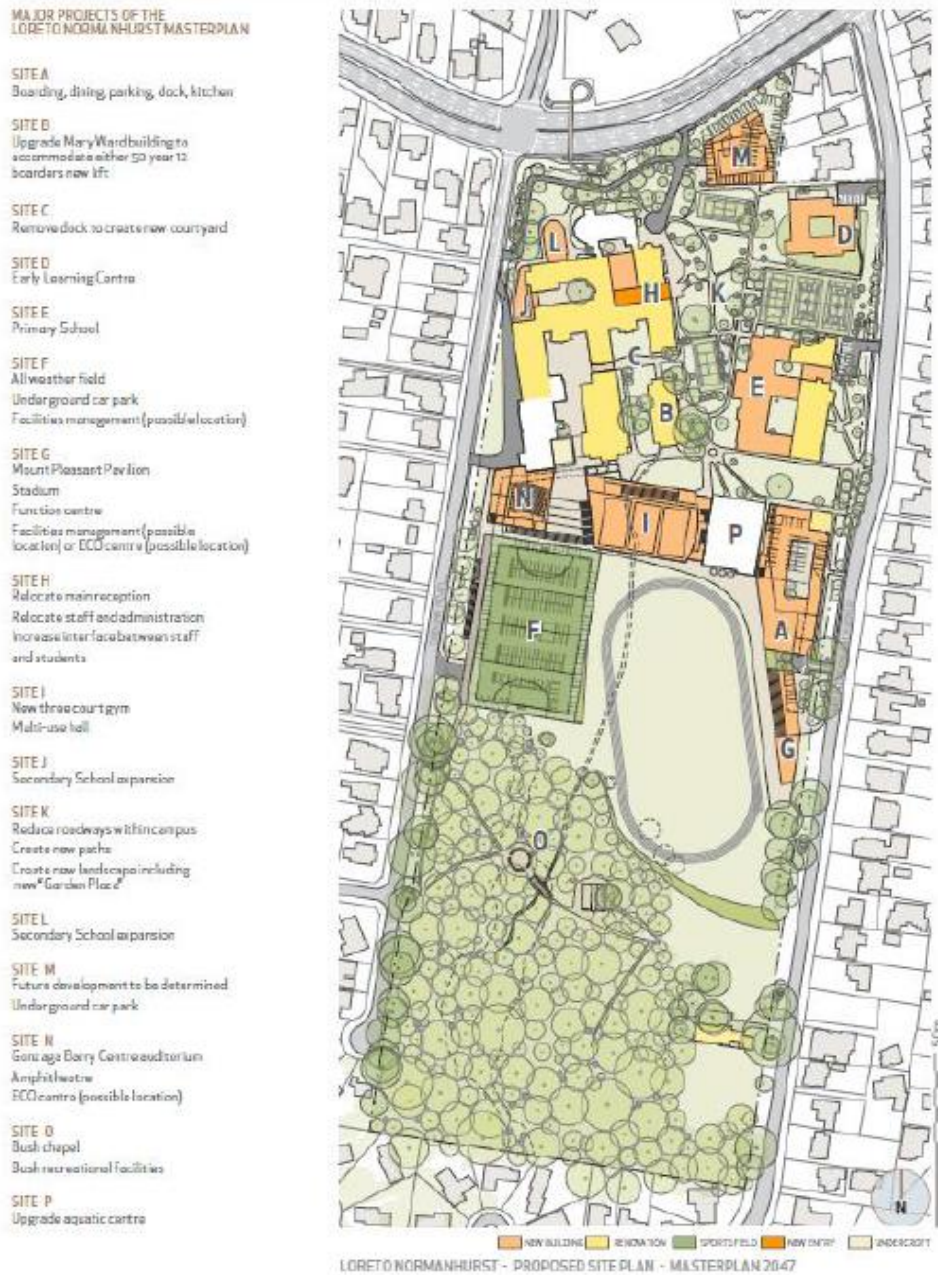


Figure 1: The proposed Loreto Normanhurst Concept Masterplan



Level 3 101 Sussex Street Sydney NSW 2000
t: (02) 9529 3800

12 March 2019

Metropolitan Local Aboriginal Land Council
PO Box 1103,
Strawberry Hills NSW 2012
metrolalc@metrolalc.org.au

To Whom It May Concern,

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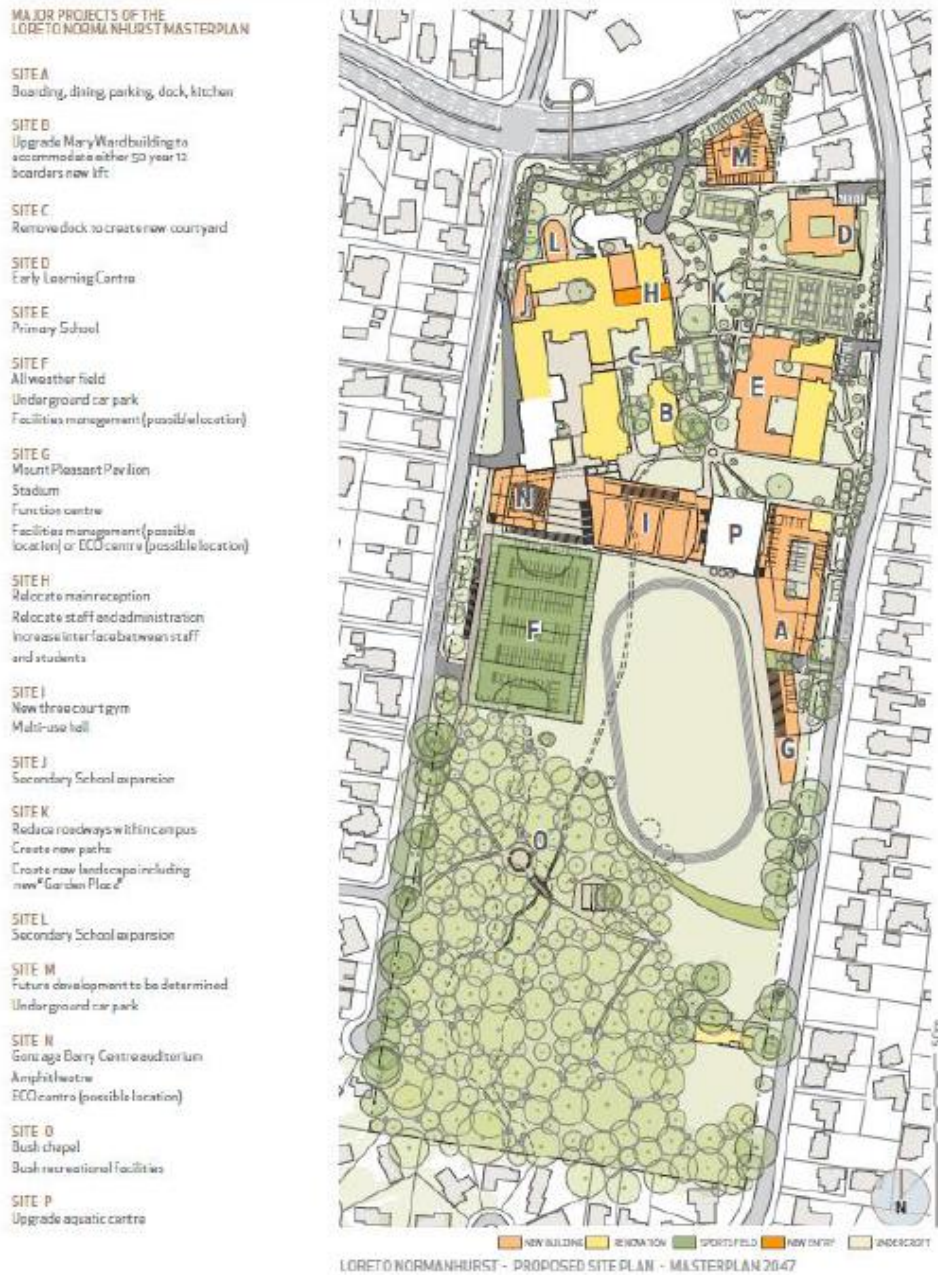


Figure 1: The proposed Loreto Normanhurst Concept Masterplan



Level 3 101 Sussex Street Sydney NSW 2000
t: (02) 9529 3800

12 March 2019

Native Title Services Corporation,
Level 1, 44-70 Rosehill Street,
Redfern, NSW 2016
information@ntscorp.com.au

To Whom It May Concern,

RE: Aboriginal Cultural Heritage Assessment – Loreto Normanhurst School, Normanhurst, NSW

Eco Logical Australia (ELA) has been engaged by Loreto Normanhurst (C/- AJ + C Architects) to conduct an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development planning approval for the proposed Loreto Normanhurst School Concept Masterplan in Normanhurst, NSW (see Figure 1). Please refer to the bottom of this letter for client contact details.

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In accordance with the SEARs, the properties that make up the Loreto Normanhurst campus will be subject to an ACHA in support of future approvals. Consultation will be undertaken in line with the Office of Environment and Heritage (OEH) guidelines for *Aboriginal cultural heritage consultation requirements for proponents 2010*. In accordance with the SEARs, proponents must provide the opportunity for Aboriginal people who hold cultural knowledge relevant to the proposed project area to be involved in the assessment process.

As per Section 4.1.2 of the OEH *Aboriginal cultural heritage consultation requirements for proponents* (2010) we would appreciate if you would provide us with a contact list of Aboriginal people registered with your organisation who may hold cultural knowledge relevant to the project area identified above.

The project area falls within the Metropolitan Local Aboriginal Land Council (LALC) and Hornsby Shire Council. ELA will be contacting the Metropolitan LALC directly as part of this consultation.

It would be appreciated if you could provide information on any Aboriginal people or organisations who we should invite to register for consultation. If you have any further questions in relation to the upcoming Aboriginal consultation process I can be contacted on 02 9259 3772. Please forward your response to Daniel Claggett, Level 3, 101 Sussex Street, Sydney NSW 2000 or email daniel.claggett@ecoaus.com.au. I thank you for your attention in this matter.

Regards,



Daniel Claggett
Archaeologist

Client Contact Details
Mark Louw

AJ + C Architects
79 Myrtle Street,
Chippendale NSW 2008
P: 9311 8222

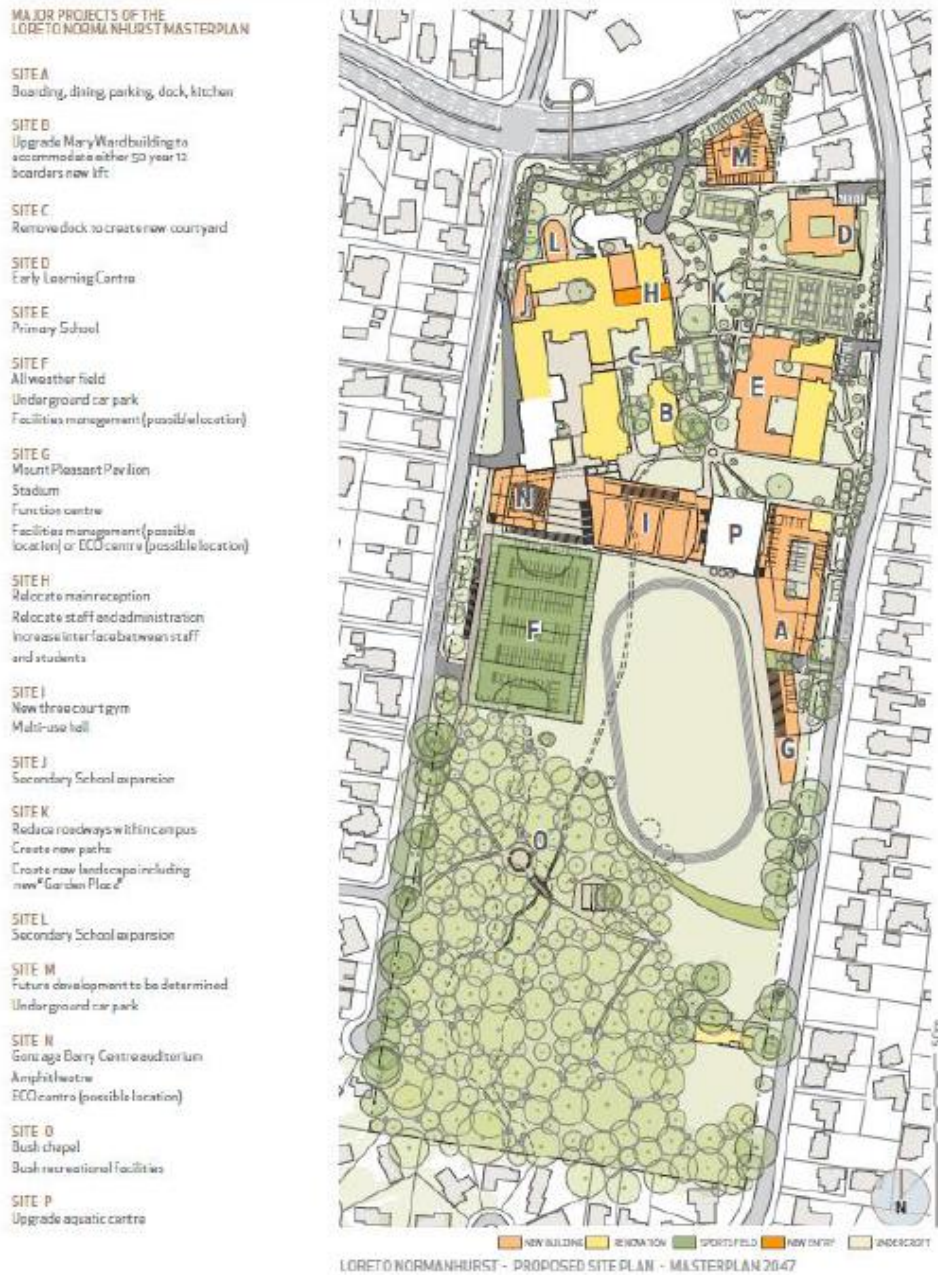


Figure 1: The proposed Loreto Normanhurst Concept Masterplan



Level 3 101 Sussex Street Sydney NSW 2000
t: (02) 9529 3800

12 March 2019

Office of Environment and Heritage
Greater Sydney Region
Regional Operations
PO Box 644 Parramatta NSW 2124
gs.ach@environment.nsw.gov.au

Attention: Susan Harrison

Dear Susan,

RE: Aboriginal Cultural Heritage Assessment – Loreto Normanhurst School, Normanhurst, NSW

Eco Logical Australia (ELA) has been engaged by Loreto Normanhurst (C/- AJ + C Architects) to conduct an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development planning approval for the proposed Loreto Normanhurst School Concept Masterplan in Normanhurst, NSW (see Figure 1). Please refer to the bottom of this letter for client contact details.

The proposed masterplan for Loreto Normanhurst seeks consent for the following works:

- Establishment of 10 new building envelopes across the site for education and ancillary uses including student accommodation;
- Increase of the student number cap by 850 students from 1150 to 2000 students;
- The open space and landscape design;
- Pedestrian and circulation arrangements;
- Associated car parking provision;
- Construction of a new 3 to 6-storey boarding house to accommodate up to 216 boarders;
- Excavation works to accommodate partially underground carpark and dock facilities within the proposed footprint of the new boarding house facility;
- Demolition works to buildings between Mary Ward and existing dining room building and associated works to make good existing;
- Landscaping works and removal and replacement of approximately 50 trees of varying significance; and
- Augmentation of connection of services and utilities infrastructure.

In accordance with the SEARs, the properties that make up the Loreto Normanhurst campus will be subject to an ACHA in support of future approvals. Consultation will be undertaken in line with the Office of Environment and Heritage (OEH) guidelines for *Aboriginal cultural heritage consultation requirements for proponents 2010*.

As per Section 4.1.2 of the OEH *Aboriginal cultural heritage consultation requirements for proponents* (2010) we would appreciate if you would provide us with a contact list of Aboriginal people registered with your organisation who may hold cultural knowledge relevant to the project area identified above.

The project area falls within the Metropolitan Local Aboriginal Land Council (LALC) and Hornsby Shire Council. ELA will be contacting the Metropolitan LALC directly as part of this consultation.

It would be appreciated if you could provide information on any Aboriginal people or organisations who we should invite to register for consultation. If you have any further questions in relation to the upcoming Aboriginal consultation process I can be contacted on 02 9259 3772. Please forward your response to Daniel Claggett, Level 3, 101 Sussex Street, Sydney NSW 2000 or email daniel.claggett@ecoaus.com.au. I thank you for your attention in this matter.

Regards,



Daniel Claggett
Archaeologist

Client Contact Details
Mark Louw

AJ + C Architects
79 Myrtle Street,
Chippendale NSW 2008
P: 9311 8222

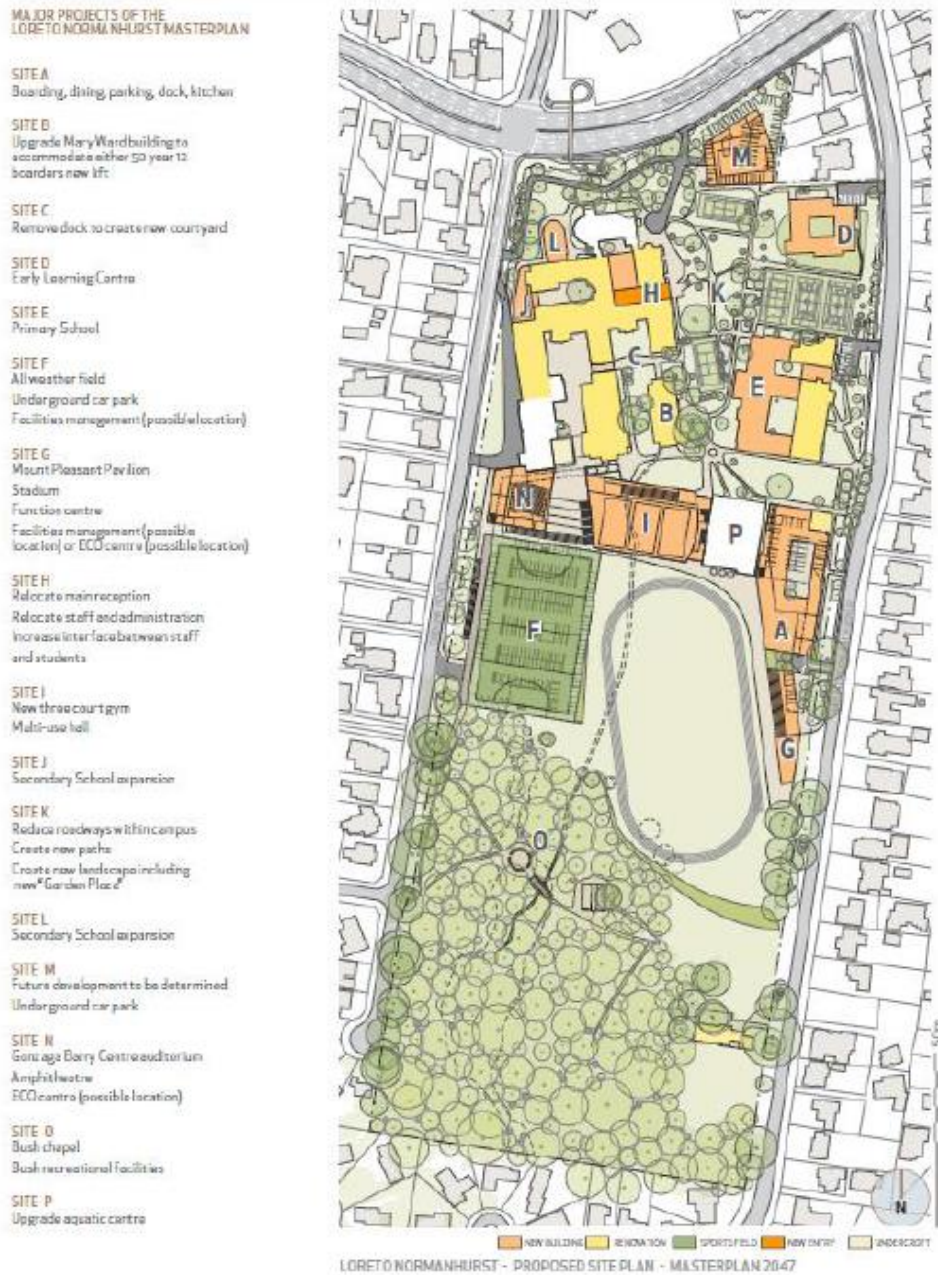


Figure 1: The proposed Loreto Normanhurst Concept Masterplan



Request for Search of Tribunal Registers

Search for overlapping interests i.e.: Is there a native title claim, determination or land use agreement over this land?

Please note: the NNTT cannot search over freehold land.

For further information on freehold land: [Click Here](#) (NNTT website)

1. Your details

NAME:	<input type="text" value="Daniel Claggett"/>
POSITION:	<input type="text" value="Archaeologist"/>
COMPANY/ORGANISATION:	<input type="text" value="Eco Logical Australia Pty Ltd"/>
POSTAL ADDRESS:	<input type="text" value="Level 3, 101 Sussex Street, Sydney, NSW 2000"/>
TELEPHONE:	<input type="text" value="02 9259 3772"/>
EMAIL:	<input type="text" value="daniel.claggett@ecoaus.com.au"/>
YOUR REFERENCE:	<input type="text" value="12197"/>
DATE OF REQUEST:	<input type="text" value="12/03/19"/>

2. Reason for your request

Are you a party to a native title proceeding?

☐ Yes ☐ No

Please provide Federal Court/Tribunal file number/or application name:

OR

Do you need to identify existing native title interests to comply with the *Native Title Act 1993* (Cth) or other

☒ Yes ☐ No

State/Territory legislation?

Please provide brief details of these obligations here:

3. Identify the area to be searched

If there is insufficient room below, please send more information on a Word or Excel document.

Mining tenure

State/Territory:

Tenement ref/s:

OR

Crown land / non-freehold tenure

Tenure type:

State/Territory:

Lot and plan details:

Pastoral Lease number or name:

Other details: (Town/County/Parish/

Section/Hundred/Portion):

☐ Lease land ☒ Reserve or other Crown land

Responses from organisations contacted in section 4.1.2 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents' (DECCW 2010)



**Office of
Environment
& Heritage**

Our reference: SF19/209374

Eco Logical Australia
Daniel Claggett
Archaeologist
Level 3, 101 Sussex street
Sydney NSW 2000

Dear Daniel,

Thank you for your letter dated 12th March 2019 to the Office of Environment and Heritage (OEH) regarding obtaining a list of the Aboriginal stakeholders that may have an interest in the proposed development for the Loreto Normanhurst School, Normanhurst NSW.

Please find attached the list of Aboriginal stakeholders known to OEH that may have an interest in the project.

As the Department of Planning and Environment is the approval authority for this project, the consultation process should be in accordance with the relevant guidelines as stipulated by the Department of Planning and Environment.

If you wish to discuss any of the above matter further please email gs.ach@environment.nsw.gov.au.

Yours sincerely

Marnie Stewart
A/Senior Team Leader Planning
Greater Sydney Branch
Communities and Greater Sydney Division

PO Box 644 Parramatta NSW 2124
Level 2, 10 Valentine Avenue Parramatta NSW 2150
Tel: (02) 9995 5477
ABN 30 841 387 271
www.environment.nsw.gov.au

To Daniel Claggett,

RE: Aboriginal Cultural Heritage Assessment – Loreto Normanhurst School, Normanhurst, NSW

Thank you for your letter dated 12 March 2019, requesting assistance with identifying Aboriginal stakeholder groups or persons who may have an interest in your project area.

Greater Sydney Local Land Services (GS LLS) acknowledges that Local Land Services have been listed in *Section 4.1.2 (g)* of the *Aboriginal cultural heritage consultation requirements for proponents 2010*, under *Part 6, National Parks and Wildlife Act 1974* as a source of information to obtain the “names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places”.

GS LLS is a partner with many Aboriginal communities in the region on many natural resource management (NRM) projects. However, GS LLS is not the primary source for contacting or managing contact lists for Aboriginal communities or persons that may inform or provide comment on planning issues. GS LLS considers cultural heritage issues that relate to land-use planning in general and only considers culture and heritage issues in the context of NRM.



We strongly recommend that you make contact with the Office of Environment and Heritage (OEH), Cultural Heritage Division, for all-inclusive contact lists of persons and organisations that may assist with your investigation.

Note: Hawkesbury Nepean Catchment Management Authority (HNCMA) no longer exists. All work previously carried out by HNCMA is now delivered by Greater Sydney Local Land Services (GS LLS).

Regards,

--

Margaret Bottrell Senior Strategic Land Services Officer
(Aboriginal Communities)
Greater Sydney Local Land Service
Level 4, 2-6 Station Street Penrith
PO Box 4515 Penrith Westfields NSW 2750
T: 02 47242111
E: margaret.bottrell@lls.nsw.gov.au
W: <http://www.lls.nsw.gov.au>

Mon 18-Mar-19 12:38 PM
 **Laura Fraser** <LFraser@hornsby.nsw.gov.au>
RE: Request for Aboriginal Stakeholder List - Loreto Normanhurst, Normanhurst, NSW
 To:  Claggett, Daniel

Dear Daniel,

I refer to your request regarding information on Aboriginal groups in the Hornsby Local Government Area.

Please find below information and website links Council has regarding Aboriginal matters.

<http://www.hornsby.nsw.gov.au/community/services/aboriginal-services>

Council has a Hornsby Aboriginal and Torres Strait Islander Advisory Committee (HATSIAC) which may be able to help with this enquiry re details for the Aboriginal Land Council and groups in the area. The Community Development staff member looking after this committee is Jian Zhao on 98476994.

A link to the NSW Aboriginal Land Council is provided below, which provides contact information.

<http://alc.org.au/land-councils/alc-boundaries--contact-details.aspx>

Trusting that this is of assistance.

Kind Regards,

Laura Fraser
Heritage Planner | Strategic Planning | Hornsby Shire Council
p 02 9847 6782
e lfraser@hornsby.nsw.gov.au | w hornsby.nsw.gov.au | f [facebook.com/HornsbyCouncil](https://www.facebook.com/HornsbyCouncil)

Council acknowledges the traditional owners of the lands of Hornsby Shire, the Darug and Guringai people.

UNCLASSIFIED

Native title search – NSW Freehold Parcels – Multiple

Your ref: 12197 - Our ref: SR5558

Dear Daniel Claggett,

Thank you for your search request received on 12 March 2019 in relation to the above area.

Please note: Records held by the National Native Title Tribunal as at 13 March 2019 indicate that the identified parcels appear to be freehold, and freehold tenure extinguishes native title. The National Native Title Tribunal does not hold data sets for freehold tenure; consequently, we **cannot** conduct searches over freehold. For confirmation of freehold data, please contact the NSW Land and Property Information office or seek independent legal advice.

For further information, please visit our [website](#).

Cultural Heritage Searches in NSW

The National Native Title Tribunal (the Tribunal) has undertaken steps to remove itself from the formal list of sources for information about indigenous groups in development areas. The existence or otherwise of native title is quite separate to any matters relating to Aboriginal cultural heritage. Information on native title claims, native title determinations and Indigenous Land Use Agreements is available on the Tribunal's website.

Interested parties are invited to use Native Title Vision (NTV) the Tribunal's online mapping system to discover native title matters in their area of interest. Access to NTV is available at <http://www.nntt.gov.au/assistance/Geospatial/Pages/NTV.aspx>. Training and self-help documents are available on the NTV web page under "Training and help documents". For additional assistance or general advice on NTV please contact GeospatialSearch@NNTT.gov.au

Additional information can be extracted from the Registers available at <http://www.nntt.gov.au/searchRegApps/Pages/default.aspx>

If you have any further queries, please do not hesitate to contact us on the free call number 1800 640 501.

Regards,

[Geospatial Searches](#)

National Native Title Tribunal | Perth

Email: GeospatialSearch@nntt.gov.au | www.nntt.gov.au



19 March 2019

By email: archaeology@ecoaus.com.au

Daniel Claggett
Archaeologist
Heritage Strategy & Development
Eco Logical Australia Pty Ltd
Level 3, 101 Sussex Street
SYDNEY NSW 2000

Dear Daniel,

Request - Search for Registered Aboriginal Owners

We refer to your letter dated 12 March 2019 (Letter) regarding an Aboriginal Cultural Heritage Assessment for the proposed developments at Loreto Normanhurst School, 91-93 Pennant Hills Road, Normanhurst as indicated on the map attached to the Letter.

Under Section 170 of the *Aboriginal Land Rights Act 1983* the Office of the Registrar is required to maintain the Register of Aboriginal Owners (RAO). A search of the RAO has shown that there are not currently any Registered Aboriginal Owners in the project area.

We suggest you contact the Metropolitan Local Aboriginal Land Council on 02 8394 9666 as they may be able to assist you in identifying Aboriginal stakeholders who wish to participate.

Yours sincerely

Elizabeth Loane
Project Officer, Aboriginal Owners
Office of the Registrar, ALRA

Address: Level 3, 2 – 10 Wentworth Street, PARRAMATTA NSW 2150
Post: P.O Box 5068, PARRAMATTA NSW 2124
Phone: 02 8633 1266

Advertisement published in the Hornsby Advocate on 15 March 2019

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Notices
General Notices

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details](http://www.buysearchsell.com.au/free-ads-for-full-details).
FREE TO LIST
buy
search
sell
.com.au

Section 4.55 (1A) – Modification to approved consent.
DA/1314/2018 30 St Helens Avenue, Mount Kuring-gai.
Construction of driveway and associated landscaping.
DA/34/2019 19 Warruga Crescent, Berowra Heights.
Construction of a dwelling-house.
DA/36/2019 26 Ingalara Avenue, Wahroonga.
Alterations and additions to a dwelling-house.

POLITICAL DISCLOSURE STATEMENT
State legislation requires the disclosure
of relevant political donations or gifts
when Planning Proposals or Development
Applications are made to minimise
any perception of undue influence.
For more information, visit our website.

HORNSBY
SHIRE COUNCIL

Notice of Aboriginal Stakeholder Consultation
Eco Logical Australia (ELA) has been engaged by Loreto Normanhurst (C/- AJ + C Architects) to conduct an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development planning approval for Loreto Normanhurst School in Normanhurst, NSW.
This notice is an invitation for interested Aboriginal organisations or people having cultural knowledge relating to this area to register their interest in a process of community consultation with the proponent. Please note that fieldwork is not expected to be undertaken as part of this ACHA.
Interested Aboriginal organisations are invited to register their interest to be consulted in writing to:
Daniel Claggett, Level 3 101 Sussex Street, Sydney NSW 2000
Email: archaeology@ecoaus.com.au Telephone: 02 9259 3772
Expressions of interest should include current contact details.
Closing date for registration is Thursday 4 April 2019. Please note that under OEH guidelines registration for consultation does not guarantee employment.
Client contact details: Mark Louw, AJ + C Architects, 79 Myrtle St, Chippendale NSW 2008, P: 9311 8222

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.com.au

Letters sent to Aboriginal people listed as having an interest in the Strathfield LGA as identified through section 4.1.2 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents' (DECCW 2010) and responses



Level 3 101 Sussex Street Sydney NSW 2000
t: (02) 9529 3800

15 March 2019

To Whom It May Concern,

Aboriginal Cultural Heritage Assessment – Loreto Normanhurst School, Normanhurst, NSW – Notice of Aboriginal stakeholder consultation

Eco Logical Australia (ELA) has been engaged by Loreto Normanhurst (C/- AJ + C Architects) to conduct an Aboriginal Cultural Heritage Assessment (ACHA) in accordance with the Secretary's Environmental Assessment Requirements (SEARs) to support a State Significant Development planning approval for the proposed Loreto Normanhurst School Concept Masterplan in Normanhurst, NSW (see Figure 1). Please refer to the bottom of this letter for client contact details.

The proposed masterplan for Loreto Normanhurst seeks consent for the following works:

- Establishment of 10 new building envelopes across the site for education and ancillary uses including student accommodation;
- Increase of the student number cap by 850 students from 1150 to 2000 students;
- The open space and landscape design;
- Pedestrian and circulation arrangements;
- Associated car parking provisions;
- Construction of a new 3 to 6-storey boarding house to accommodate up to 216 boarders;
- Excavation works to accommodate partially underground carpark and dock facilities within the proposed footprint of the new boarding house facility;
- Demolition works to buildings between Mary Ward and existing dining room building and associated works to make good existing;
- Landscaping works and removal and replacement of approximately 50 trees of varying significance; and
- Augmentation of connection of services and utilities infrastructure.

In accordance with the SEARs, the properties that make up the Loreto Normanhurst campus will be subject to an ACHA in support of future approvals. Consultation will be undertaken in line with the Office of Environment and Heritage (OEH) guidelines for *Aboriginal cultural heritage consultation requirements for proponents 2010*.

In accordance with the SEARs, proponents must provide the opportunity for Aboriginal people who hold cultural knowledge relevant to the proposed project area to be involved in the assessment process.

This letter is an invitation for Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal objects and places in the area of the proposed project to register an interest in a process of community consultation with AJ + C Architects.

Your contact details have been provided to ELA by the Office of Environment and Heritage (OEH) as a person / or group who may have a cultural interest in the proposed project. Please note that fieldwork is not expected to be undertaken as part of this ACHA.

The purpose of the community consultation with Aboriginal people is to assist the proponent in understanding the cultural significance of the project area and to determine the likelihood of Aboriginal sites or objects being present within the project area.

Interested Aboriginal organisations or people having cultural knowledge relating to this area are invited to register their interest to be consulted in writing to: Daniel Claggett, Eco Logical Australia, Level 3, 101 Sussex Street, Sydney NSW 2000 – email archaeology@ecoaus.com.au - telephone: 02 9259 3772 by: Thursday 4 April 2019.

Please note under the consultation requirements your details will be forwarded to the OEH and the Local Aboriginal Land Council (LALC) upon receipt of your registration of interest. If you do not wish to have your details forwarded on to the LALC please notify ELA when registering your interest in the proposed project. In addition, also note that under OEH guidelines registration for consultation does not guarantee employment.

Regards,



Daniel Claggett
Archaeologist

Client Contact Details
Mark Louw

AJ + C Architects
79 Myrtle Street,
Chippendale NSW 2008
P: 9311 8222

MAJOR PROJECTS OF THE
LORETO NORMANHURST MASTERPLAN

SITE A
Boarding, dining, parking, dock, kitchen

SITE B
Upgrade Mary Ward building to
accommodate either 50 year 12
boarders new lift

SITE C
Remove dock to create new courtyard

SITE D
Early Learning Centre

SITE E
Primary School

SITE F
All weather field
Underground car park
Facilities management (possible location)

SITE G
Mount Pleasant Pavilion
Stadium
Function centre
Facilities management (possible
location) or ECO centre (possible location)

SITE H
Relocate main reception
Relocate staff and administration
Increase interface between staff
and students

SITE I
New three court gym
Multi-use hall

SITE J
Secondary School expansion

SITE K
Reduce roadways within campus
Create new paths
Create new landscape including
new "Garden Plaza"

SITE L
Secondary School expansion

SITE M
Future development to be determined
Underground car park

SITE N
Gonzaga Barry Centre auditorium
Amphitheatre
ECO centre (possible location)

SITE O
Bush chapel
Bush recreational facilities

SITE P
Upgrade aquatic centre



LORETO NORMANHURST - PROPOSED SITE PLAN - MASTERPLAN 2047

LORETO NORMANHURST MASTERPLAN - SEARS DRAWINGS - DECEMBER 2017

loretonormanhurst **AJ+C**
ALAN JACKSON

Figure 1: Proposed works

A1

Indigenous Services

Contact: Carolyn

M: 0411650057

E: Cazadirect@live.com

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

ABN: 20 616 970 327

Hi

A1 would like to register for consultation and an field work for this project.

I hold cultural knowledge and connection to this area.

Thank you

Carolyn Hickey

Hi Daniel

Thank you for your email

AHCS would like to formally register an interest in the project Loreto Normanhurst School NSW

AHCS would like to register an interest in field works and consultation on his project

If there's anything you need please don't hesitate to contact me

Have a great day

Amanda AHCS

Get [Outlook for Android](#)



Tue 19-Mar-19 7:39 AM

Goobah <goobahchts@gmail.com>

Re: Notice of Registration for Aboriginal Stakeholder Consultation - Loreto Normanhurst School, Normanhurst NSW

To: ● Claggett, Daniel; ○ ELA.Archeology



image001.jpg
jpg File

Hi Daniel

This is Goobahs expression of interest to register for the above project.

We wish to be kept informed of any further developments thank you.

**Barking Owl
Aboriginal
Corporation**

ICN 8822

barkingowlcorp@gmail.com



26th March 2018

Dear Daniel,

RE: LORETO NORMANHURST SCHOOL NORMANHURST NSW
ABORIGINAL CULTURAL HERITAGE ASSESSMENT

We would like to register interest for full consultation and involvement in the study area.

Registering Aboriginal Party:	Barking Owl Aboriginal Corporation
Contact Person:	Jody Kulakowski
Phone:	0426 242 015
Email:	barkingowlcorp@gmail.com (preferred contact method)

We are able to provide fit and hardworking site officers to assist with work that may involve physical labour with current white cards and all PPE equipment.

We can provide copies of relevant certificates of currency for business insurances on request.

Members put forward have experience in a variety of community consultation projects through other Registered Corporations.

Please feel free to contact by email barkingowlcorp@gmail.com if you require any further information.

kind regards

Jody Kulakowski
Director
Barking Owl Aboriginal Corporation
0426 242 015



**DARUG LAND
OBSERVATIONS PTY LTD
ABN 27 602 765 453**

EMAIL: DARUGLANDOBSERVATIONS@GMAIL.COM
PO BOX 173 ULLADULLA NSW 2539
MOBILE: 0413 687 279

27th March, 2019

Daniel Claggett
Eco Logical Australia
Level 3, 101 Sussex Street
SYDNEY NSW 2000

Notification and Registration of ALL Aboriginal Interests

RE: PROPOSED MASTERPLAN OF LORETO NORMANHURST SCHOOL,
NORMANHURST
Aboriginal Cultural Heritage Assessment

Dear Daniel,

Please be advised that Darug Land Observations Pty Ltd is seeking to be involved in any and all consultation meetings and fieldwork.

This office specialises in Aboriginal and community consultations, and has a membership that comprises of Traditional owners from the area in question. Those retain strong story, song lines, oral history and continued contact.

We would also like to state that we do not accept or support any person or organisation that are NOT from the DARUG Nation that comments regarding the said area.

Please also be advised that this Aboriginal organisation does not do volunteer work or attend unpaid meetings. I hope that you advise your client of this so that, 'This Group', will not be discriminated against and refused paid fieldwork. DLO's rate is \$440 half day (less than 4 hours) and \$880 per day (flat rate), including GST.

All correspondence should be emailed to: daruglandobservations@gmail.com and any further consultation during this project can be directed to Anna O'Hara on mobile 0413 687 279.

Yours sincerely,

Jamie Workman
Darug Land Observations Pty Ltd

Uncle Gordon Workman
Darug Elder



Sun 17-Mar-19 2:56 PM

Caine Carroll <Goodradigbee1@outlook.com>

Re: Notice of Registration for Aboriginal Stakeholder Consultation - Loreto Normanhurst School, Normanhurst NSW

To  Claggett, Daniel

Hi Daniel,

I would like to express my interest in the above project.

Goodradigbee Cultural and Heritage Aboriginal Corporation, may hold some significant information with the proposed works.

Director- Caine Carroll
Goodradigbee Cultural & Heritage
Aboriginal Corporation
0410974236



Ngambaa Cultural Connections

Date: 25.03.2019

To: Daniel Claggett,
Eco Logical Australia,
Level 3, 101 Sussex Street,
Sydney NSW 2000

RE: I am writing in regards to Express my Interest to register for consultation – Aboriginal Cultural Heritage Assessment: Loreto Normanhurst School, Normanhurst, NSW

I am an experienced Aboriginal Site Officer and have cultural knowledge which is relevant to the project area and have cultural connection to the Sydney Basin Region through the Darug tribe and ancestral connection through (Colbee and Black Kitty from the late 1700's).

I have been working within Aboriginal Heritage Work within the Sydney Basin Regions for Warragil Cultural Services.

I now operate my own business which is Ngambaa Cultural Connections and I would like to be given an opportunity to further my knowledge and skills which I have great experience in Aboriginal Cultural Heritage in Aboriginal Archaeology due to being engaged in field work and identifying Aboriginal heritage values and I am aware of the impacts of any changes to the land uses on those values.

I have great pride in my culture and I acknowledge the lands that I live and work on and I pay my respects to the elders past and present and I reside within the Sydney Basin Region and I am an active member in the Aboriginal Communities.

I have been engaged in field archaeological salvage works incorporating the following:

- Inspection, identification of Aboriginal sites
- Archaeological test-pitting and salvage of Aboriginal sites, inclusive of wet and dry sieving operations
- Systematic surface collection of Aboriginal artefacts during mechanical excavation works
- Provision of input into Aboriginal cultural heritage values.
- Local Sydney Basin - Western Sydney / South Western Sydney Regions

I have my insurances and white card on request and if you require any further information regarding this letter please don't hesitate in contacting me or the following references.

Name: Kaarina Slater
Company: Ngambaa Cultural Connections
Phone: 0422 896 154

Kind Regards
Kaarina Slater
Ngambaa Cultural Connection

Ngambaa Cultural Connections
PHONE: 0422 896 154 EMAIL: ngambaaculturalconnections@hotmail.com.au
ABN: 93 117080909



Tocomwall Pty Ltd

PO Box 76 Caringbah NSW 1495

Tel: 02 9542 7714 Fax: 02 9524 4146

Email: info@tocomwall.com.au www.tocomwall.com.au

ABN: 13 137 694 618

18 March 2019

Daniel Claggett
Archaeologist
Email: archaeology@ecoaus.com.au

Dear Daniel,

RE: Aboriginal Cultural Heritage Assessment (Loreto Normanhurst School, Normanhurst, NSW)

Registration of Interest (ROI)

Thank you for your notification regarding the Registration of Interest for the opportunity to provide cultural knowledge for the above mentioned project. Tocomwall respectfully requests primary involvement in all consultation meetings and fieldwork associated with the project.

Tocomwall represents traditional owners associated with the project area and retains local knowledge and oral history that will add significant value to the Project's heritage assessment. We have no objection to our contact information being provided to the Office of Environment and Heritage or the Local Aboriginal Land Council.

Tocomwall is also able to assist with input that can be incorporated into a written assessment of cultural values of the area. We employ a well-structured team with the capacity to support all necessary field work for the project. We can provide our schedule of rates and copies of relevant certificates of currency for business insurances upon request.

Tocomwall is a small business that relies upon a consistent cash flow that ensures we can continue to fulfil our client's needs. Unfortunately, the Tocomwall team is not in a position to provide volunteer work or attend meetings on a gratuitous basis. Tocomwall respectfully requests payment terms of 14 days from date of invoice. We would appreciate a copy of the contract and terms and conditions prior to commencement of the project.

Please provide all correspondence to Danny Franks at danny@tocomwall.com.au and info@tocomwall.com.au or to the above postal address.

Should you have any further questions regarding this ROI please contact me directly on 0415 226 725.

Yours faithfully

Danny Franks
Cultural Heritage Manager

Integrating Landscape Science & Aboriginal Cultural Knowledge for our Sustainable Future


 Reply  Reply All  Forward  IM

Thu 04-Apr-19 12:12 PM



Phillip Boney <Waarlan12@outlook.com>

Loreto Normanhurst School

To  Claggett, Daniel



Hi Daniel,


My name is Phil Boney of Wailwan Aboriginal Group. I would like to register my interest in the Loreto Normanhurst School Consultation. I am sure that during the duration of this Consultation there will be great respect and due diligence shown in all aspects of the said project culturally and significantly. If I am a successful candidate for this project I look forward to working with you. If there is anything else you need please do not hesitate to contact me. Thank you.

With regards, Phil Boney
Wailwan Aboriginal Group

Consultation Stage 2 and 3 Detail

Responses to project background and methodology sent to RAPs

 Mon 15-Apr-19 8:31 PM
Barking Owl Aboriginal Corporation <barkingowlcorp@gmail.com>
Re: Loreto Normanhurst Masterplan - ACHA Information and Methodology
To  Claggett, Daniel

 Loreto Normanhurst - Project Information and Methodology.pdf
.pdf File

Dear Daniel,

Myself and the members of Barking Owl Aboriginal Corporation have agreed and are satisfied with the ACHA information and methodology, RE: Loreto Normanhurst, and have no further comments or recommendations.

Kind regards

Jody Kulakowski
Barking Owl Aboriginal Corporation
BOAC

On 4 Apr 2019, at 9:30 am, Claggett, Daniel <Daniel.Claggett@ecoaus.com.au> wrote:

Barking Owl Aboriginal Corporation
barkingowlcorp@gmail.com



**DARUG LAND
OBSERVATIONS PTY LTD
ABN 27 602 765 453**

EMAIL: DARUGLANDOBSERVATIONS@GMAIL.COM
PO BOX 173 ULLADULLA NSW 2539
MOBILE: 0413 687 279

22nd April, 2019

Daniel Claggett
Eco Logical Australia Pty Ltd
PO BOX Q1082
QUEEN VICTORIA BUILDING NSW 1230

Dear Daniel,

**RE: LORETO NORMANHURST SCHOOL CONCEPT MASTERPLAN,
91-93 PENNANT HILLS ROAD, NORMANHURST**

Aboriginal Cultural Heritage Assessment: Project Information & Methodology

Darug Land Observations Pty Ltd (DLO) has reviewed the project information and methodology, and supports the methodology for the proposed masterplan for Loreto Normanhurst, located at 91-93 Pennant Hills Road, in Normanhurst.

Look forward to working with you again, in the near future.

Yours sincerely,

Jamie Workman
Darug Land Observations Pty Ltd

Uncle Gordon Workman
Darug Elder

Appendix B AHIMS search results



Office of
Environment
& Heritage

AHIMS Web Services (AWS) Search Result

Purchase Order/Reference : 11454

Client Service ID : 373763

Eco Logical Australia Pty Ltd - Sydney

Date: 02 October 2018

PO Box 12 668 Old Princes Hwy
Sutherland New South Wales 1499

Attention: Daniel Claggett

Email: daniel.claggett@ecoaus.com.au

Dear Sir or Madam:

AHIMS Web Service search for the following area at Datum :GDA, Zone : 56, Eastings : 323810 - 323870, Northings : 6266397 - 6266563 with a Buffer of 1000 meters, conducted by Daniel Claggett on 02 October 2018.

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



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

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



SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
45-6-2369	Bone shelter;	AGD	56	323180	6265680	Closed site	Valid	Artefact : -	Shelter with Deposit	2047
	<u>Contact</u>	<u>Recorders</u>	Val Attenbrow					<u>Permits</u>		
45-6-2099	Dynamited;	AGD	56	323140	6265520	Closed site	Valid	Artefact : -	Shelter with Deposit	
	<u>Contact</u>	<u>Recorders</u>	Val Attenbrow					<u>Permits</u>		
45-6-0896	Window Cave;Pennant Hills;	AGD	56	322890	6265450	Closed site	Valid	Artefact : -	Shelter with Deposit	1809
	<u>Contact</u>	<u>Recorders</u>	Val Attenbrow,T Barlow,K Cutmore					<u>Permits</u>		
45-6-0897	Normanhurst;	AGD	56	323375	6267007	Closed site	Valid	Artefact : -	Shelter with Deposit	
	<u>Contact</u>	<u>Recorders</u>	ASRSYS					<u>Permits</u>		
45-6-2040	Coups creek;	AGD	56	323570	6265750	Closed site	Valid	Artefact : -	Shelter with Deposit	102203
	<u>Contact</u>	<u>Recorders</u>	Val Attenbrow					<u>Permits</u>		

Report generated by AHIMS Web Service on 02/10/2018 for Daniel Claggett for the following area at Datum :GDA, Zone : 56, Eastings : 323810 - 323870, Northings : 6266397 - 6266563 with a Buffer of 1000 meters. Additional Info : Archaeological Assessment/Due Diligence. Number of Aboriginal sites and Aboriginal objects found is 5
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.

