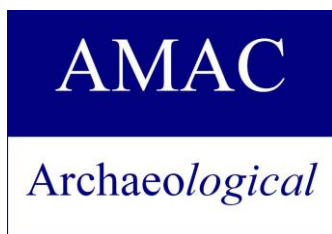


ABORIGINAL CULTURAL HERITAGE ASSESSMENT

Lot 3, DP861843 and Lot 52, DP1041134
1 Driver Avenue
Royal Hall of Industries
Moore Park NSW 2021
Sydney LGA



**Benjamin Streat, Yolanda Pavincich &
Steven J. Vasilakis**

Archaeological Management & Consulting
Group & Streat Archaeological Services

For



**Urbis Planning
on behalf of
Sydney Swans Limited**

July 2019

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The veracity of this report is not guaranteed unless it is a complete and original copy.

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Cover Image

Aerial of study area

Study site indicated in red outline. Six Maps, LPI Online (accessed 18th March 2019).

ACKNOWLEDGEMENT OF COUNTRY

Urbis Planning would like to acknowledge the Traditional Custodians of the Eora Nation – the Gadigal and Wangal peoples – and pay respect to their cultural heritage, beliefs and continuing relationship with the land.

NSW Department of Education would also like to acknowledge the post contact experiences of Aboriginal peoples who have attachment to the Sydney area.

“We pay our respect to the Elders – past, present and future – for they hold the memories, traditions, culture and hopes of Aboriginal Peoples in the area”.

NSW Department of Education recognises the role of the registered Aboriginal parties in the management of the Aboriginal cultural heritage sites, landscape features and values of this project.

NSW Department of Education would like to thank the Registered Aboriginal Parties for their participation in this project and for their valuable contribution to this Aboriginal Cultural Heritage Assessment which has been enriched by their willingness to share valuable aspects of their cultural knowledge especially in respect of Caring for Country

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EXECUTIVE SUMMARY

Background

Streat Archaeological Services Pty Ltd (SAS) in conjunction with Archaeological Management and Consulting Group (AMAC) was commissioned by Urbis Planning on behalf of Sydney Swans Limited in March 2019, to prepare a Due Diligence Aboriginal Archaeological Assessment and Aboriginal Cultural Heritage Assessment at Lot 3 DP 861843 and Lot 52 DP 1041134, 1 Driver Avenue, Moore Park, New South Wales.

Aboriginal Consultation

Consultation for this report has been undertaken in accordance with the Office of Environment and Heritage and National Parks and Wildlife Act 1974: Part 6; National Parks and Wildlife Act *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010).

There is a mandatory 28-day period for the Aboriginal stakeholders to comment on this document. A final Aboriginal stakeholder approved version of this report shall be issued at the close of this period (should any changes be required as a result of the exhibition process or Aboriginal stakeholder comment they will be included at this stage).

Recommendations

There are no confirmed Aboriginal archaeological site records located within the study area on the Aboriginal Heritage Information Management System (AHIMS) or from other sources of information of which the author of this report is aware of.

The landscape has been identified as being heavily disturbed with the site located in the sporting grounds of Moore Park. Prior to land modification works, the site would have been part of a sand dune system interspersed by a complex of wetlands.

The study area has a deep soil profile with the potential for *intact* natural soils below the layers of fill. Based on this information, sub-surface Aboriginal objects with potential conservation value may be present within these undisturbed parts of the study area. As the proposed activity will be involving some subsurface excavation up to a depth of 3 metres to accommodate lift pit/wet areas, it is recommended that a qualified archaeologist be onsite to monitor the excavation of these areas.

If natural soils are encountered, appropriate mitigation will need to take place as outlined in the recommendations below.

The recommendations have been formulated after consultation with the proponent and the Office of Environment and Heritage (OEH);

- If natural soils are encountered as outlined in section 5.0 of this document, the following should take place
 - Further management in the form of an Aboriginal Cultural Heritage Management Plan, including full Aboriginal community consultation in accordance with Part 6; National Parks and Wildlife Act, *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010); this has already taken place as a pre-emptive measure and part of this process is this document. Having this document in place prior to any excavation will

reduce the possibility of delays in the building process and AMAC strongly recommends an ACHMP be in place prior to excavation.

- If natural soils are encountered as outlined in section 5.0 of this document, the following should take place
 - Subsequent to this report and in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974, (DECCW 2010)*, a program of systematic, sub surface archaeological test excavation in accordance with the *Code Of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, Part 4 National Parks and Wildlife Act 1974 (DECCW 2010)*, should be undertaken to establish the nature and extent of any archaeological objects and/or deposits that are/may be present.
 - If archaeological test excavation in accordance with the *Code of Practice for Archaeological Investigations of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974, (DECCW 2010)* reveals no Aboriginal archaeological objects or deposits; The proposed activity as outlined in Section 4.0, should be allowed to 'proceed with caution';
 - If archaeological test excavation in accordance with *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974 (DECCW 2010)* reveals Aboriginal archaeological objects or deposits; once the nature and extent of the archaeological site has been established through test excavation, this data needs to be analysed and synthesised into a test excavation report before the proposed activity can recommence;
- Before any ground disturbance takes place all development staff, contractors and workers should be briefed prior to works commencing on site, as to the status of the area and their responsibilities in ensuring preservation of the said area. They should also be informed of their responsibilities regarding any Indigenous archaeological deposits and/or objects that may be located during the following development;

Should any human remains be located during the following development;

- all excavation in the immediate vicinity of any objects of deposits shall cease immediately and the area is to be secured so no further harm is to come to these remains;
- the NSW police and OEH's Environment Line 131 555 are to be informed as soon as possible including any available details of the remains and their location;
- once it has been established that the human remains are Aboriginal ancestral remains, authorisation is required by OEH in consultation with relevant Registered Aboriginal Parties identifying the appropriate course of action.

Should any Aboriginal archaeological deposits or objects be located during the development;

- all excavation in the vicinity of any objects and/or deposits shall cease immediately and the area secured;
- OEH and a suitably qualified archaeologist should be notified so the significance of the said deposits or objects can be evaluated and presented in a report and the study area recorded as an archaeological site;
- the archaeological deposits or objects will require the production of an Aboriginal Cultural Heritage Management Plan, of which the way forward will be subject to

the recommendations of this report in consultation with OEH, prior to the development continuing.

1.0 CULTURAL HERITAGE ASSESSMENT METHODOLOGY

1.1 BACKGROUND

Archaeological Management and Consulting Group (AMAC) in conjunction with Streat Archaeological Services Pty Ltd (SAS) was commissioned by Urbis Planning in January 2019, to prepare an Aboriginal Cultural Heritage Assessment and possible Test Excavation, if intact natural soil profiles are encountered, in response to SEARs condition 3, point 3 issued for State Significant Development # 9627 for the proposed development that is part of the adaptive reuse of the Royal Hall of Industries at Lot 3, DP861843 and Lot 52, DP1041134, at the following street address 1 Driver Avenue, Moore Park NSW. This report specifically addressed SEARs condition 3, point 3 (Appendix 2).

This report conforms to the reporting process, conditions and requirements of Aboriginal Cultural Heritage Standards and Guidelines Kit (NPWS 1998) and Part 6; National Parks and Wildlife Act Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010).

1.2 STUDY AREA

The project site is located at 1 Driver Avenue, Moore Park, Parish of Alexandria, County of Cumberland. The site is accommodated on two separate lots, legally described as Lot 3 DP861843 and a portion of Lot 52 of DP1041134. (Figure 1.1 – Figure 1.2).

Address	Lot	Deposited Plan
1 Driver Avenue, Moore Park	3	861843
116 Lang Road, Moore Park	52	1041134

1.3 SCOPE

The document aims to provide registered Aboriginal persons and/or organisations who hold cultural knowledge relevant to determining the cultural significance of Aboriginal object(s) and/or place(s) within or in the vicinity of the area of the proposed activity. This knowledge is then presented for synthesis, analysis and compilation into a Cultural Heritage Assessment about the study area.

This information is used to assess the impact of the proposed activity on any identified items or places of Aboriginal cultural heritage value and to develop mitigative strategies under the appropriate legislation for the management of Aboriginal archaeological and cultural heritage values of the study area.

This document also allows the proponent or the proponent's representative to outline the project details and the participating Aboriginal stakeholders to have input into formulating mitigative strategies at identified points in the impact assessment process. With these clearly identified roles this methodology and project background is submitted to the participating Aboriginal stakeholders for review and input for a period of no less than 28 days.

1.4 AUTHOR IDENTIFICATION

The analysis of the archaeological background and the reporting were undertaken by Mr. Benjamin Streat (BA, Grad Dip Arch Her, Grad Dip App Sc), archaeologist and Director of Streat Archaeological Services Pty Ltd in association with archaeologists Ms. Yolanda Pavincich (B. Arch., Grad Dip Cul Her.) and Steven J. Vasilakis (B. Arch. Hons.), under the guidance of Mr. Martin Carney archaeologist and Managing Director of AMAC Group.

1.5 ACKNOWLEDGEMENTS

The author would like to thank the following for advice and/or input into this assessment;

- Eliza Scobie of Urbis Planning;
- Makayla Horwood of La Perouse LALC;
- Lowanna Gibson of Butucarbin Aboriginal Corporation;
- Anna O'Hara of Darug Land Observations;
- Lisa Green of Ginninderra Aboriginal Corp;
- Caine Carroll of Goodradigbee Cultural & Heritage Aboriginal Corporation;
- Phillip Boney of Wailwan Aboriginal Digging Group;
- Carolyn Hickey of A1 Indigenous Services.



Figure 1-1 **Aerial of study area.**
Study site indicated in red outline. Six Maps, LPI Online (accessed 18/03/19).

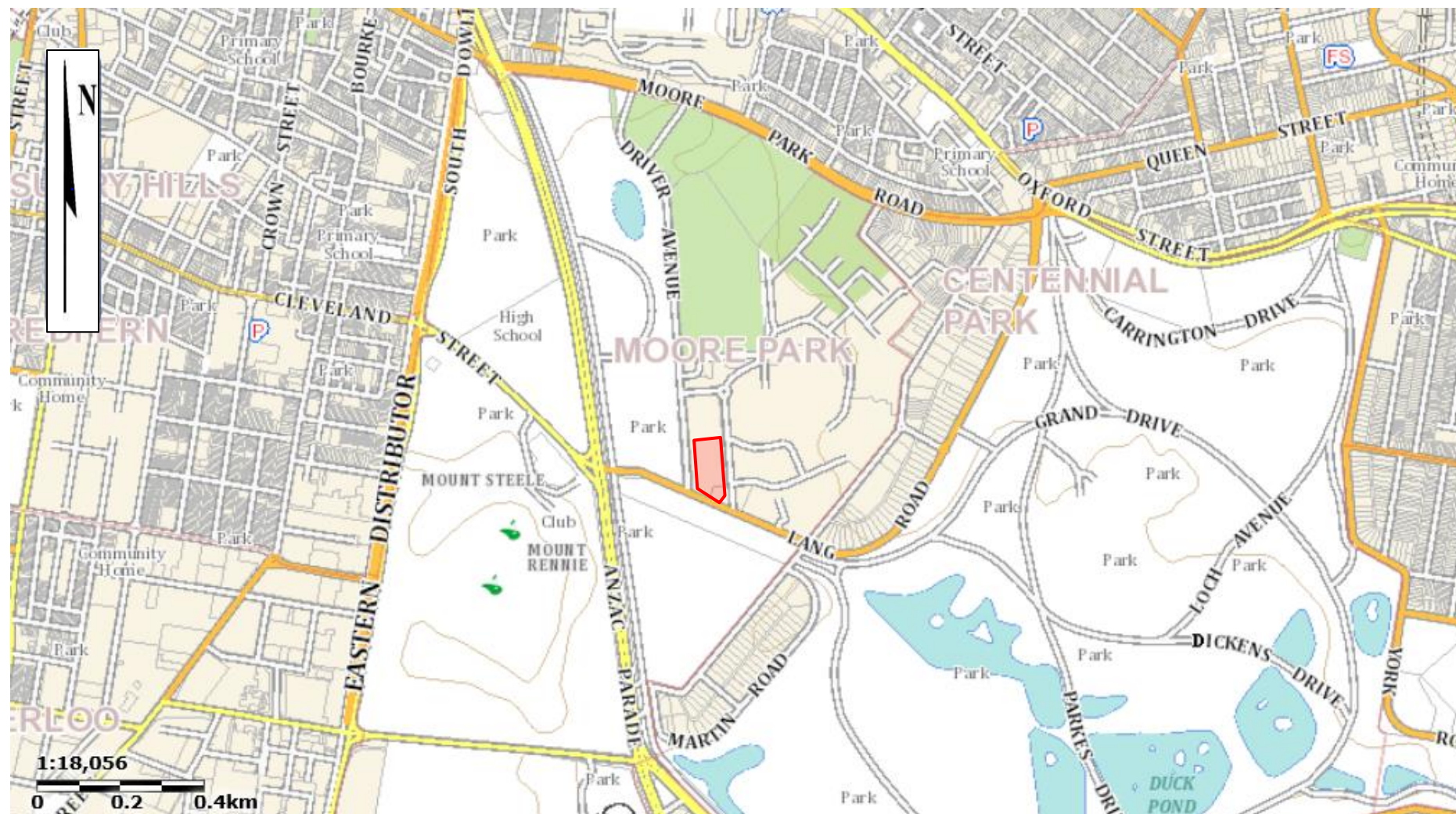


Figure 1-2 Topographic map with study area indicated by red fill.
Six Maps, LPI Online (accessed 18/03/19).

2.0 LEGISLATIVE CONTEXT AND STATUTORY CONTROLS

This section of the report provides a brief outline of the relevant legislation and statutory instruments that protect Aboriginal archaeological and cultural heritage sites within the state of New South Wales. Some of the legislation and statutory instruments operate at a federal or local level and as such are applicable to Aboriginal archaeological and cultural heritage sites in New South Wales. This material is not legal advice and is based purely on the author's understanding of the legislation and statutory instruments. This document seeks to meet the requirements of the legislation and statutory instruments set out within this section of the report.

COMMONWEALTH HERITAGE LEGISLATION AND LISTS

The state (NSW) based legislation that is of relevance to this assessment comes in the form of the acts which are outlined below.

2.1.1 National Parks and Wildlife Act 1974

The NSW National Parks and Wildlife Act 1974 (as amended) defines Aboriginal objects and provides protection to any and all material remains which may be evidence of the Aboriginal occupation of lands continued within the state of New South Wales. The relevant sections of the Act are sections 84, 86, 87 and 90.

An Aboriginal object, formerly known as a relic is defined as:

any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains" (NSW Government, 1974).

It is an offence to harm or desecrate an Aboriginal object or places under Part 6, Section 86 of the NPW Act:

Part 6, Division 1, Section 86: Harming or desecrating Aboriginal objects and Aboriginal places:

- (1) *A person must not harm or desecrate an object that the person knows is an Aboriginal object.*

Maximum penalty:

- (a) *in the case of an individual—2,500 penalty units or imprisonment for 1 year, or both, or (in circumstances of aggravation) 5,000 penalty units or imprisonment for 2 years, or both, or*
- (b) *in the case of a corporation—10,000 penalty units.*

- (2) *A person must not harm an Aboriginal object.*

Maximum penalty:

- (a) *in the case of an individual—500 penalty units or (in circumstances of aggravation) 1,000 penalty units, or*
- (b) *in the case of a corporation—2,000 penalty units.*

- (3) *For the purposes of this section, **circumstances of aggravation** are:*

- (a) *that the offence was committed in the course of carrying out a commercial activity, or*

- (b) *that the offence was the second or subsequent occasion on which the offender was convicted of an offence under this section.*

This subsection does not apply unless the circumstances of aggravation were identified in the court attendance notice or summons for the offence.

- (4) *A person must not harm or desecrate an Aboriginal place.*

Maximum penalty:

- (a) *in the case of an individual—5,000 penalty units or imprisonment for 2 years, or both, or*
- (b) *in the case of a corporation—10,000 penalty units.*
- (5) *The offences under subsections (2) and (4) are offences of strict liability and the defence of honest and reasonable mistake of fact applies.*
- (6) *Subsections (1) and (2) do not apply with respect to an Aboriginal object that is dealt with in accordance with section 85A.*
- (7) *A single prosecution for an offence under subsection (1) or (2) may relate to a single Aboriginal object or a group of Aboriginal objects.*
- (8) *If, in proceedings for an offence under subsection (1), the court is satisfied that, at the time the accused harmed the Aboriginal object concerned, the accused did not know that the object was an Aboriginal object, the court may find an offence proved under subsection (2).*

2.1.2 Environmental Planning & Assessment Act 1979

The Environmental Planning and Assessment Act 1979 (EP&A Act) states that environmental impacts of proposed developments must be considered in land use planning procedures. Four parts of this act relate to Aboriginal cultural heritage.

- *Part 3 of the Act, specifically Division 3.3 and 3.4 refer to State Environmental Planning Policies (SEPPs) and Local Environmental Planning Policies (LEPs) respectively, and call for the assessment of Aboriginal heritage among other requirements.*
- *Part 4.15 determines what developments require consent and what developments do not require consent. Section 79C calls for the evaluation of*
The likely impacts of that development, including environmental impacts on both the natural and built environments and the social and economic impacts in the locality (NSW Government 1979).
- *Part 5 of this Act requires that impacts in a locality which may have an impact on the aesthetic, anthropological, architectural, cultural, historic, scientific, recreational or scenic value are considered as part of the development application process (NSW Government, 1979).*

2.1.3 The Aboriginal Land Rights Act 1983

The NSW Aboriginal Land Rights Act 1983 (ALR Act), administered by the NSW Department of Aboriginal Affairs, established the NSW Aboriginal Land Council (NSWALC) and Local Aboriginal Land Councils (LALCs). The ALR Act requires these bodies to:

- *take action to protect the culture and heritage of Aboriginal persons in the council's area, subject to any other law;*
- *promote awareness in the community of the culture and heritage of Aboriginal persons in the council's area.*

These requirements recognise and acknowledge the statutory role and responsibilities of New South Wales Aboriginal Land Council and Local Aboriginal Land Councils. The ALR Act also establishes the Office of the Registrar whose functions include but are not limited to, maintaining the Register of Aboriginal Land Claims and the Register of Aboriginal Owners.

Under the ALR Act the Office of the Registrar is to give priority to the entry in the Register of the names of Aboriginal persons who have a cultural association with:

- lands listed in Schedule 14 to the NPW Act;
- lands to which section 36A of the ALR Act applies (NSW Government, 1974 & DECCW 2010).

2.1.4 The Native Title Act 1993

The *Native Title Act 1993* (NTA) provides the legislative framework to:

- recognise and protect native title;
- establish ways in which future dealings affecting native title may proceed, and to set standards for those dealings, including providing certain procedural rights for registered native title claimants and native title holders in relation to acts which affect native title;
- establish a mechanism for determining claims to native title;
- provide for, or permit, the validation of past acts invalidated because of the existence of native title.

The National Native Title Tribunal has a number of functions under the NTA including maintaining the Register of Native Title Claims, the National Native Title Register and the Register of Indigenous Land Use Agreements and mediating native title claims (NSW Government, 1974 & DECCW 2010).

2.1.5 New South Wales Heritage Register and Inventory 1999

The State Heritage Register is a list of places and objects of particular importance to the people of NSW. The register lists a diverse range of over 1,500 items, in both private and public ownership. Places can be nominated by any person to be considered to be listed on the Heritage register. To be placed an item must be significant for the whole of NSW. The State Heritage Inventory lists items that are listed in local council's local environmental plan (LEP) or in a regional environmental plan (REP) and are of local significance.

2.1.6 Register of Declared Aboriginal Places 1999

The NPW Act protects areas of land that have recognised values of significance to Aboriginal people. These areas may or may not contain Aboriginal objects (i.e. any physical evidence of Aboriginal occupation or use). Places can be nominated by any person to be considered for Aboriginal Place gazettal. Once nominated, a recommendation can be made to EPA/OEH for consideration by the Minister. The Minister declares an area to be an 'Aboriginal place' if the Minister believes that the place is or was of special significance to Aboriginal culture. An area can have spiritual, natural resource usage, historical, social, educational or other type of significance. Under section 86 of the NPW Act it is an offence to harm or desecrate a declared Aboriginal place. Harm includes destroying, defacing or damaging an Aboriginal place. The potential impacts of the development on an Aboriginal place must be assessed if the development will be in the vicinity of an Aboriginal place (DECCW 2010).

2.2 COMMONWEALTH HERITAGE LEGISLATION AND LISTS

One piece of legislation and two statutory lists and one non-statutory list are maintained and were consulted as part of this report: the National Heritage List; the Commonwealth Heritage List and the Register of the National Estate.

2.2.1 Environmental Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) offers provisions to protect matters of national environmental significance. This act establishes the National Heritage List and the Commonwealth Heritage List which can include natural, Indigenous and historic places of value to the nation. This Act helps ensure that the natural, Aboriginal and historic heritage values of places under Commonwealth ownership or control are identified, protected and managed (Australian Government 1999).

2.2.2 National Heritage List

The National Heritage List is a list which contains places, items and areas of outstanding heritage value to Australia; this can include places, items and areas overseas as well as items of Aboriginal significance and origin. These places are protected under the Australian Government's EPBC Act.

2.2.3 Commonwealth Heritage List

The Commonwealth Heritage List can include natural, Indigenous and historic places of value to the nation. Items on this list are under Commonwealth ownership or control and as such are identified, protected and managed by the Federal Government.

2.2.4 Register of the National Estate

The Register of the National Estate is a list of natural, Indigenous and heritage places throughout Australia. It was originally established under the *Australian Heritage Commission Act 1975* (AHC Act). This has now been replaced by the Environment Protection and Biodiversity Conservation Act 1999. The register continued to operate until February 2012 when it was completely replaced by The Commonwealth Heritage List (see Section 2.2.3).

2.3 LOCAL PLANNING INSTRUMENTS

2.3.1 Sydney Local Environmental Plan 2012

The Sydney Local Environment Plan was endorsed in 2012. Heritage Conservation is discussed in Part 5; Clause 5.10. The following section highlights the archaeological considerations of a site in relation to developments:

5.10 Heritage conservation

(1) Objectives

The objectives of this clause are as follows:

- (a) *to conserve the environmental heritage of the City of Sydney,*
- (b) *to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,*
- (c) *to conserve archaeological sites,*

- (d) to conserve Aboriginal objects and Aboriginal places of heritage significance.

(2) Requirement for consent

Development consent is required for any of the following:

- (a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):
 - (i) a heritage item,
 - (ii) an Aboriginal object,
 - (iii) a building, work, relic or tree within a heritage conservation area,
- (b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,
- (c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,
- (d) disturbing or excavating an Aboriginal place of heritage significance,
- (e) erecting a building on land:
 - (i) on which a heritage item is located or that is within a heritage conservation area, or
 - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,
- (f) subdividing land:
 - (i) on which a heritage item is located or that is within a heritage conservation area, or
 - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.

(3) When consent not required

However, development consent under this clause is not required if:

- (a) the applicant has notified the consent authority of the proposed development and the consent authority has advised the applicant in writing before any work is carried out that it is satisfied that the proposed development:
 - (i) is of a minor nature or is for the maintenance of the heritage item, Aboriginal object, Aboriginal place of heritage significance or archaeological site or a building, work, relic, tree or place within the heritage conservation area, and
 - (ii) would not adversely affect the heritage significance of the heritage item, Aboriginal object, Aboriginal place, archaeological site or heritage conservation area, or
- (b) the development is in a cemetery or burial ground and the proposed development:

- (i) *is the creation of a new grave or monument, or excavation or disturbance of land for the purpose of conserving or repairing monuments or grave markers, and*
- (ii) *would not cause disturbance to human remains, relics, Aboriginal objects in the form of grave goods, or to an Aboriginal place of heritage significance, or*
- (c) *the development is limited to the removal of a tree or other vegetation that the Council is satisfied is a risk to human life or property, or*
- (d) *the development is exempt development.*

(8) Aboriginal places of heritage significance

The consent authority must, before granting consent under this clause to the carrying out of development in an Aboriginal place of heritage significance:

- (a) *consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place by means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement), and*
- (b) *notify the local Aboriginal communities, in writing or in such other manner as may be appropriate, about the application and take into consideration any response received within 28 days after the notice is sent*

(10) Conservation incentives

The consent authority may grant consent to development for any purpose of a building that is a heritage item or of the land on which such a building is erected, or for any purpose on an Aboriginal place of heritage significance, even though development for that purpose would otherwise not be allowed by this Plan, if the consent authority is satisfied that:

- (a) *the conservation of the heritage item or Aboriginal place of heritage significance is facilitated by the granting of consent, and*
- (b) *the proposed development is in accordance with a heritage management document that has been approved by the consent authority, and*
- (c) *the consent to the proposed development would require that all necessary conservation work identified in the heritage management document is carried out, and*
- (d) *the proposed development would not adversely affect the heritage significance of the heritage item, including its setting, or the heritage significance of the Aboriginal place of heritage significance, and*
- (e) *the proposed development would not have any significant adverse effect on the amenity of the surrounding area*

2.3.2 Sydney Development Control Plan 2012

The Sydney Local Environment Plan was endorsed by Council in 2012. Heritage Conservation is discussed in Part 3; Clause 9.1-6. The following section highlights the Aboriginal archaeological considerations of a site in relation to developments.

3.9. Objectives

- (a) *Ensure that heritage significance is considered for heritage items, development within heritage conservation areas, and development affecting archaeological sites and places of Aboriginal heritage significance.*
- (b) *Enhance the character and heritage significance of heritage items and heritage conservation areas and ensure that infill development is designed to respond positively to the heritage character of adjoining and nearby buildings and features of the public domain.*

3.9.3 Archaeological assessments

- (1) *An archaeological assessment is to be prepared by a suitably qualified archaeologist in accordance with the guidelines prepared by the NSW Office and Environment and Heritage.*
- (2) *For development proposals in Central Sydney, refer to the Central Sydney Archaeological Zoning Plan to determine whether the development site has archaeological potential.*
- (3) *An archaeological assessment is to be submitted as part of the Statement of Environmental Effects for development applications affecting an archaeological site or a place of Aboriginal heritage significance, or potential archaeological site that is likely to have heritage significance.*
- (4) *An archaeological assessment is to include:*
 - (a) *an assessment of the archaeological potential of the archaeological site or place of Aboriginal heritage significance;*
 - (b) *the heritage significance of the archaeological site or place of Aboriginal heritage significance;*
 - (c) *the probable impact of the proposed development on the heritage significance of the archaeological site or place of Aboriginal heritage significance;*
 - (d) *the compatibility of the development with conservation policies contained within an applicable conservation management plan or conservation management strategy; and*
 - (e) *a management strategy to conserve the heritage significance of the archaeological site or place of Aboriginal heritage significance.*
- (5) *If there is any likelihood that the development will have an impact on significant archaeological relics, development is to ensure that the impact is managed according to the assessed level of significance of those relics.*

2.3.3 State Environmental Planning Policy No 47—Moore Park Showground

The State Environmental Planning Policy No 47—Moore Park Showground was endorsed by Council in 2018. Heritage Conservation is discussed in both Part 1 Clause 3 (g) and Part 4; Clause 15 (k). The following sections highlight the Heritage Significance under which archaeological considerations (that include Aboriginal Heritage) of a site in relation to developments.

1.3 Aims and objectives

This Policy aims:

- (a) to enable the redevelopment of the Moore Park Showground in a manner that is consistent with its status as an area of importance for State and regional planning in New South Wales, and
- (b) to improve and enhance the cultural and recreational facilities of Sydney for the people of New South Wales by furthering the development of Sydney as a world class film, television and video production centre, and
- (c) to recognise the State significance of a film and television studio on the Moore Park Showground in terms of employment generation and additional revenue for the State, and
- (d) to allow a range of film, television, video and related development, commercial uses associated with the film, television and video industry and other entertainment, recreational and educational activities on the Moore Park Showground, and
- (e) to ensure that a range of impacts is considered by the consent authority in determining development applications, and
- (f) to ensure that community and equestrian uses can continue on parts of the Moore Park Showground and that provision is made for public access, and
- (g) to the heritage significance of the Moore Park Showground and protect any archaeological relics.

4.15 Matters for consideration

In addition to considering other matters referred to in section 90 of the *Environmental Planning and Assessment Act 1979*, in determining a development application, the consent authority must consider such of the following matters as are in the consent authority's opinion of relevance to the development:

- (a) the management of noise emanating from the development and the views of the Environment Protection Authority in relation to noise,
- (b) traffic and parking generated by the development, measures to facilitate the use of public transport and the views of the Roads and Traffic Authority and Department of Transport,
- (c) the height, scale and bulk of the development and whether the development maintains the original road layout and vistas,

- (d) overshadowing impacts on open spaces and adjoining residential properties,
- (e) the capacity of on-site sewerage and drainage systems and their performance in a manner that will not cause adverse effects on the quality of the Centennial Park ponds and Botany wetlands,
- (f) the extent to which the development is ecologically sustainable,
- (g) whether there is contamination on the site, or asbestos is present in buildings, and remediation and validation of remediation so as to protect public health,
- (h) the appearance of external lighting at the site and measures to minimise spill,
- (i) the impact of the development on the amenity of the adjoining residential areas,
- (j) the provisions of the Conservation Strategy for the Moore Park Showground and the views of the Heritage Council,
- (k) how the proposed development would affect the heritage significance of the site and any relic known or reasonably likely to be located at the site.

2.4 DUE DILIGENCE CODE OF PRACTICE FOR THE PROTECTION OF ABORIGINAL OBJECTS IN NEW SOUTH WALES

This assessment conforms to the parameters set out in the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974, (DECCW 2010).

The Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales states that if;

- a desktop assessment and visual inspection confirm that there are Aboriginal objects or that they are likely, then further archaeological investigation and impact assessment is necessary.

2.5 CODE OF PRACTICE FOR ARCHAEOLOGICAL INVESTIGATION OF ABORIGINAL OBJECTS IN NEW SOUTH WALES

Any further work resulting from recommendations should be carried out conforming to the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974, (DECCW 2010).

2.6 GUIDELINES

This report has been carried out in consultation with the following documents which advocate best practice in New South Wales:

- Aboriginal Archaeological Survey, Guidelines for Archaeological Survey Reporting (NSW NPWS 1998);

- Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974, (DECCW 2010);
- Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974, (DECCW 2010);
- Aboriginal Cultural Heritage Standards and Guidelines Kit (NPWS 1998);
- Australia ICOMOS 'Burra' Charter for the conservation of culturally significant places (Australia ICOMOS 1999);
- Part 6; National Parks and Wildlife Act Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010);
- Protecting Local Heritage Places: A Guide for Communities (Australian Heritage Commission 1999).

3.0 ABORIGINAL CONSULTATION

Consultation for this document was undertaken in accordance with the *Office of Environment and Heritage and National Parks and Wildlife Act 1974: Part 6; National Parks and Wildlife Act Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010), for test excavation under the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974*, (DECCW 2010).

3.1 Overview of Aboriginal Community Consultation

Consultation for this report has been undertaken in accordance with the *Office of Environment and Heritage and National Parks and Wildlife Act 1974: Part 6; National Parks and Wildlife Act Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010).

All registered stakeholders are to be given a copy of a proposed Aboriginal Cultural Heritage Assessment. All registered parties have had the opportunity to review and comment on this document. All comments have been incorporated into the assessment.

Table 3-1 Consultation Summary

STAGE 1						
Authority Letters & Advertisement						
Authority Body/ Organisation	Contact Person	Contact Details	Date Sent	Method	Response Received	Date
Sydney City Council	Heritage Officer	GPO Box 1591, Sydney NSW 2001	8/02/2019	Mail	No	
Greater Sydney LLS	Heritage Officer	PO BOX 4515, Westfield Penrith NSW 2750	8/02/2019	Mail	Yes	14/03/2019
La Perouse Local Aboriginal Land Council	Heritage Officer	PO BOX 1103, Strawberry Hills NSW 2016	8/02/2019	Mail	No	
NSW Native Title Services	Heritage Officer	PO BOX 2105, Strawberry Hills NSW 2012	8/02/2019	Mail	No	
NNTT	Heritage Officer	GPO BOX 9973, Sydney NSW 2001	8/02/2019	Mail	No	
NTSCORP	Heritage Officer	PO BOX 2105, Strawberry Hills NSW 2012	8/02/2019	Mail	No	
OEH	Archaeologist	PO BOX 644, Parramatta NSW 2124	8/02/2019	Mail	Yes	12/02/2019
Office of Registrar	Heritage Officer	PO BOX 112, Glebe NSW 2037	8/02/2019	Mail	Yes	19/02/2019
Newspaper Advertisement:	Wentworth Courier				Date printed: 20/03/19	End Period: 03/04/19
Stakeholders Contacted	Minimum 14 days to register	(18/02/2019) - (04/03/2019)				
Name/Organisation	Contact Person	Contact Details	Date Sent	Method	Notes	
La Perouse LALC	Chris Ingrey	PO Box 365 Matraville NSW 2036	18/02/2019	Mail		
Darug Aboriginal Cultural Heritage Assessments	Celestine Everingham	Unit 9/ 6 Chapman Ave, Chatswood NSW 2067	18/02/2019	Mail		

Darug Land Observations	Jamie & Anna Workman	PO Box 173, Ulladulla NSW 2539	18/02/2019	Mail	
A1 Indigenous Services	Carolyn Hickey	10 Marie Pitt Place, Glenmore Park NSW 2745	18/02/2019	Mail	
Eric Keidge		11 Olson Close, Hornsby Heights NSW 2077	18/02/2019	Email	
Tocomwall	Scott Franks	PO Box 76, Caringbah NSW 1495	18/02/2019	Mail	
Gunyyu	Kylie Ann bell	gunyyu@mirramajah.com	18/02/2019	Email	Email Bounced - Invalid Address
Walbunja	Hika te Kowhai	walbunja@gmail.com	18/02/2019	Email	
Badu	Karia Lea Bond	11 Jeffery Pl, Moruya NSW 2537	18/02/2019	Mail	
Goobah Developments	Basil Smith	66 Grantham Rd, Batehaven NSW 2536	18/02/2019	Mail	
Wullung	Lee-Roy James Boota	54 Blackwood St, Gerringong NSW 2534	18/02/2019	Mail	
Yerramurra	Robert Parson	Yerramurra@gmail.com	18/02/2019	Email	
Nundagurri	Newton Carriage	Nundagurri@gmail.com	18/02/2019	Email	
Murrumbul	Mark Henry	murrumbul@gmail.com	18/02/2019	Email	
Jerringong	Joanne Anne Stewart	Jerringong@gmail.com	18/02/2019	Email	
Pemulwuy CHTS	Pemulwuy Johnson	pemulwuyd@gmail.com	18/02/2019	Email	
Bilinga	Simalene Carriage	bilingachts@gmail.com	18/02/2019	Email	

Munyunga	Kaya Dawn Bell	munyangachts@gmail.com	18/02/2019	Email	
Wingikara	Hayley Bell	wingikarachts@gmail.com	18/02/2019	Email	
Minnamunnung	Aaron Broad	1 Waratah Ave, Albion Park Rail NSW 2527	18/02/2019	Mail	
Walgalu	Ronald Stewart	walgaluchts@gmail.com	18/02/2019	Email	
Thauaira	Shane Carriage	thauairachts@gmail.com	18/02/2019	Email	
Dharug	Andrew Bond	dharguchts@gmail.com	18/02/2019	Email	
Bilinga Cultural Heritage Technical Services	Robert Brown	bilinga@mirramaja.com	18/02/2019	Email	Email Bounced - Invalid Address
Gunyu Cultural Heritage Technical Services	Darlene Hoskins-McKenzie	gunyu@mirramajah.com	18/02/2019	Email	Email Bounced - Invalid Address
Munyunga Cultural Heritage Technical Services	Suzannah McKenzie	munyunga@mirramajah.com	18/02/2019	Email	Email Bounced - Invalid Address
Murrumbul Cultural Heritage Technical Services	Levi McKenzie-Kirkbright	murrumbul@mirramajah.com	18/02/2019	Email	Email Bounced - Invalid Address
Wingikara Cultural Heritage Technical Services	Wandai Kirkbright	wingikarachts@mirramajah.com	18/02/2019	Email	Email Bounced - Invalid Address
Gulaga	Wendy Smith	gulagachts@gmail.com	18/02/2019	Email	
Biamanga	Seli Storer	biamangachts@gmail.com	18/02/2019	Email	
Cullendulla	Corey Smith	cullendullachts@gmail.com	18/02/2019	Email	

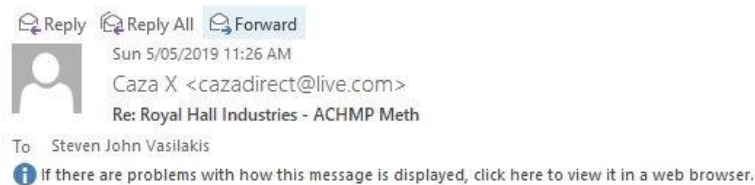
Murramarang	Roxanne Smith	murramarangchts@gmail.com	18/02/2019	Email	
DJMD Consultancy	Darren Duncan	darrenjohnduncan@gmail.com	18/02/2019	Email	
Butucarbin Aboriginal Corporation	Jennifer Beale	PO BOX E18, Emerton NSW 2770	18/02/2019	Mail	
Didge Ngunawal Clan	Lillie Carroll & Paul Boyd	7 Siskin St, Quakers Hill NSW 2763	18/02/2019	Mail	
Ginninderra Aboriginal Corp	Steven Johnson & Krystle Carroll	PO BOX 3143, Grose Vale NSW 2754	18/02/2019	Mail	
Nerringundah	Newton Carriage	nerrigundachts@gmail.com	18/02/2019	Email	
Wailwan Aboriginal Digging Group	Philip Boney	Waarlan12@outlook.com	18/02/2019	Email	
Barking Owl Aboriginal Corporation	Jody Kulakowski	2/65-69 Wehlow St. Mt. Druitt NSW	18/02/2019	Mail	
Thoorga Nura	John Carriage	50B Hilltop Crescent, Surf Beach NSW 2536	18/02/2019	Mail	
Darug Booroogerongal Elders Aboriginal Corporation	Gordon Workman	73 Judith Anderson Dr. Doonside NSW 2767	18/02/2019	Mail	
B.H. Heritage Consultants	Ralph Hampton	184 Captain Cook Dr. Willmot NSW 2770	18/02/2019	Mail	
B.H. Heritage Consultants	Nola Hampton	95 Mt. Ettalong Rd. Umina Beach NSW 2257	18/02/2019	Mail	
Ngambaa Cultural Connections	Kaarina Slater	6 Natchez Crescent, Greenfield Park NSW 2167	18/02/2019	Mail	
Goodradigbee Cultural & Heritage Aboriginal Corporation	Caine Carroll	1 Morilla Rd. East Kurrajong NSW 2758	18/02/2019	Mail	

Registered Organisations/Individuals	Contact Person	Email Address	Date	Method	Notes
La Perouse LALC	Makayla Horwood	Mhorwood@laperouse.org.au	28/02/2019	Email	
Butucarbin Aboriginal Corporation	Lowanna Gibson	Butuheritage@gmail.com	5/03/2019	Mail	
Darug Land Observations	Anna Ohara	daruglandobservations@gmail.com	22/02/2019	Email	Attached Letter
Ginninderra Aboriginal Corp	Lisa Green	ginninderra.corp@gmail.com	4/03/2019	Email	Attached Letter
Goodradigbee Cultural & Heritage Aboriginal Corporation	Caine Carroll	Goodradigbee1@outlook.com	21/02/2019	Email	
Wailwan Aboriginal Digging Group	Phillip Boney	Waarlan12@outlook.com	18/02/2019	Email	
A1 Indigenous Services	Carolyn Hickey	cazadirect@live.com	23/02/2019	Email	
STAGE 2 & 3					
ACHAR Methodology (/Test Excavation Methodology)	Minimum 28 days to respond	(15/04/2019) - (13/05/2019)			
Contacted Organisation/ Individuals	Contacted by Organisation/ Individual	Subject	Date	Method	Notes
All RAPs	AMAC/Steven J. Vasilakis	Dispatch ACHAR Research Design & Testing Methodology	15/04/2019	Email	
AMAC/Steven J. Vasilakis	AI Indigenous - Carolyn Hickey	ACHAR Methodology	5/05/2019	Email	Supports ACHAR Methodology
AMAC/Steven J. Vasilakis	Butucarbin - Lowanna Gibson	ACHAR Methodology	14/05/2019	Email	Attached Letter Supports ACHAR Methodology

Test Excavation (TBC)		(00/00/2019) - (00/00/2019)			
STAGE 4					
ACHAR Report	Minimum 28 days to respond	(24/05/2019) - (21/06/2019)			
Contacted Organisation/ Individuals	Contacted by Organisation/ Individual	Subject	Date	Method	Notes
All RAPs	AMAC/Steven J. Vasilakis	Dispatch ACHAR Report	24/05/20019	Email	
All RAPs	AMAC/Steven J. Vasilakis	ACHAR Review Reminder	21/06/2019	Email	No Comments Received

3.2 ACHMP Methodology Submissions

3.2.1 A1 Indigenous Services



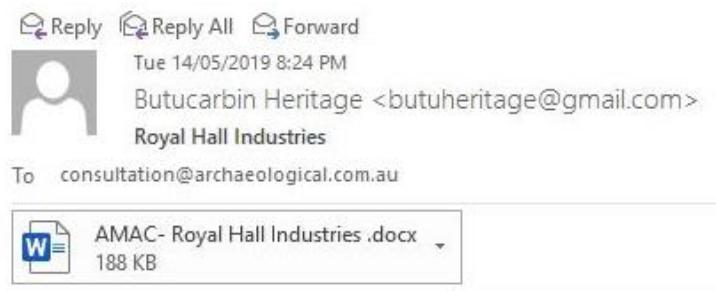
A1

Indigenous Services

Contact: Carolyn
M: 0411650057
E: [Cazadirect@live.com](mailto:cazadirect@live.com)
A: 10 Marie Pitt Place, Glenmore Park, NSW 2745
ABN: 20 616 970 327

Hi,
A1 supports the Aboriginal Cultural Heritage Management Plan - Research Design & Testing Methodology
thank you
Carolyn Hickey

3.2.2 Butucarbin Cultural Heritage Assessments



To whom it may concern,
please see attached.

kind regards,

--

Lowanna Gibson
Project Manager for Butucarbin Cultural Heritage Assessments
B.A Archaeology/Anthropology USYD
Juris Doctor Candidate UTS



BUTUCARBIN ABORIGINAL CORPORATION

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

14th May, 2019

To whom it may concern,

I offer my sincerest apologies for the delayed response in relation to the Aboriginal Cultural Heritage Management Plan and methodology.
Butucarbin is in full support of the aforementioned and would be interested in assisting in any further work the project requires.

Please see our schedule of rates below.

Schedule of Rates

Our rates are as follows:

Fieldwork - \$110.00 per hour
Perusal and comment of reports - \$110.00 per hour
Mileage Allowance – 0.75 cent per kilometre

Yours Sincerely,

Lowanna Gibson
Project Manager for Butucarbin Cultural Heritage and Assessment
B.A Archaeology/Anthropology USYD
Juris Doctor Candidate UTS

No Further Submissions Received

4.0 PROPOSED ACTIVITY

This section outlined the proposed activity including the staging and timeframes along with the potential harm of the proposed activity on Aboriginal objects and or declared Aboriginal places, assessing both the direct and indirect result of the activity on any cultural heritage values associated with the study area.

4.1 DESCRIPTION OF PROPOSED ACTIVITY

The Sydney Swans Limited are proposing adaptive reuse of the Royal Hall of Industries building and southern courtyard to be transformed into a Sydney Swans headquarters and community centre (see Figures 4.1-4.16).

Based on the proposed development plans, the following proposed works have been included:

- Site preparation works, including:
 - Partial demolition of non-heritage significant elements within the RHI building, including internal walls, doorways, stairways and sections of the existing floor plates and roof structure, and removal of existing external doorway infills to provide nine new openings.
 - Demolition of the existing services shed and part of the existing brick wall along the south-eastern corner, and removal of all existing pavement and driveways surrounding the building.
 - Structural upgrade works and minor excavation of depths up to 3m to accommodate lift pits and wet area set downs.
 - Decommissioning and removal of the existing electrical kiosk on the southern elevation of the building, and removal of any redundant mechanical plant.
 - Diversion of existing stormwater and sewer routes.
- Adaptive reuse of the Royal Hall of Industries building. The development will maintain the façade of the building and permit the structural insertion of a 2,868sqm (GFA) mezzanine around the central span of the building to allow for the construction of two internal floors. Specifically, the building will become Home of the Sydney Swans and will include
 - High-performance sports facilities including a multi-purpose indoor area, gymnasium, altitude room and multi-purpose exercise room.

- Players facilities including male and female amenities and locker rooms, players library, study area, communal dining hall and lounge with rooftop terrace.
- Medical and rehabilitation facilities including massage and physiotherapy areas, offices and workstations for medical staff, 20m lap pool, recovery hot and cold plunge pools, spa and sauna facilities and a 491sqm medical tenancy for public consultation and treatment.
- Administrative facilities including reception areas, office spaces for club operations (both open plan and individual spaces) for up to 206 staff, including meeting rooms, breakout spaces and ancillary office areas including amenities, storage and utility areas.
- Facility which will allow for a Swans team in the AFL National Women's Competition.
- A 60m x 30m multi-purpose indoor facility available for community use and public events.
- Facilities for the Sydney Swans Academy.
- Community and public facilities including a dedicated Red Cross Blood Bank Donor Centre, 80-seat auditorium, a dedicated home for the Clontarf and GO Foundations, café and memorabilia displays of both Sydney Swans and the building.
- The development of a two-storey mixed-use building with a total GFA of up to 2,090sqm and a building height of some 10.03m (Swifts building). The building will be occupied by the NSW Swifts and will accommodate various training, rehabilitation, administration and community spaces as follows:
 - 844sqm indoor netball court for the NSW Swifts and wider netball community.
 - Medical and rehabilitation facilities including physiotherapy areas and medical workstations.
 - Players facilities including meeting rooms, lunchroom, amenities, locker rooms and lounge with rooftop terrace.
 - Administrative facilities including office spaces for club operations for up to 24 NSW Swifts staff and players, meeting rooms and ancillary office areas including amenities, storage and utility areas.
- Retention of existing vehicle entrance and creation of two pedestrian and one vehicular access points on Errol Flynn Boulevard, and provision of 11 at-grade angled car parking spaces, one loading bay and 37 bicycle parking spaces.
- Removal of seven trees and onsite landscaping.

The above material is (section 4.1) is supplied by Urbis (Scobie, pers comm, 2019).

4.2 AREAS OF EXCULSION

No formal areas of exclusion have been identified in the current plans.

4.3 POTENTIAL HARM TO ABORIGINAL OBJECTS AND CULTURAL HERITAGE

The proposed development activity will disturb the ground surface and may disturb Aboriginal objects and areas of cultural significance. The study area has been shown to have a low archaeological significance. As such the proposed development has the potential to disturb Aboriginal archaeological deposits, objects and items or areas of cultural significance.

4.4 ASSESSING HARM

Based on the geotechnical findings, much of the natural soil profiles have been disturbed or removed leaving little in the way of intact features of archaeological and cultural value. As such the potential to harm potential Aboriginal archaeological deposits, objects and items or areas of cultural significance is viewed as low.

4.5 AVOIDING AND MINIMISING HARM TO ABORIGINAL OBJECTS

This section cannot be completed as no known Aboriginal archaeological deposits, objects and items or areas of cultural significance are present.

4.6 ECOLOGICALLY SUSTAINABLE DEVELOPMENT AND INTERGENERATIONAL EQUITY

The ability of any development to be completely ecologically sustainable will be limited by definition. However, the proponents of this development appear to have made significant efforts to meet the needs of the current generation without compromising the ability of future generations to meet their own needs. This has been accomplished by proposing a plan on a manageable and affordable scale while still seeking to understand the nature and extent of the archaeological resources and recovering and recording a representative sample of the archaeological material present. This is being accomplished by the provision to carry out a program of subsurface test excavation and open area test excavation if required as well as extensive consultation with the relevant Aboriginal community and interpretation.

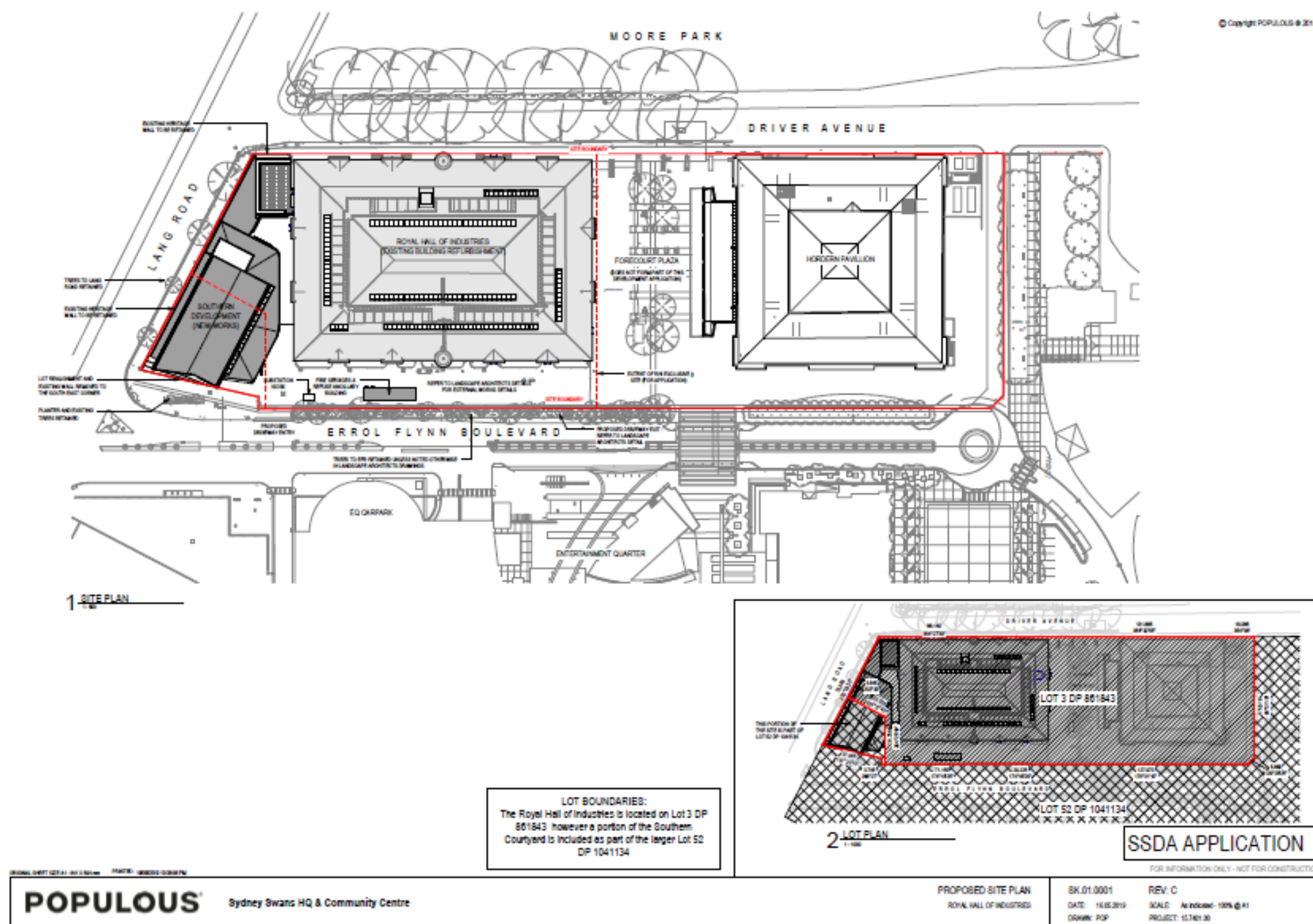


Figure 4-1 Proposed Site Plan.
Populous May 2019. Drawing No. SK.01.0001 Rev C.



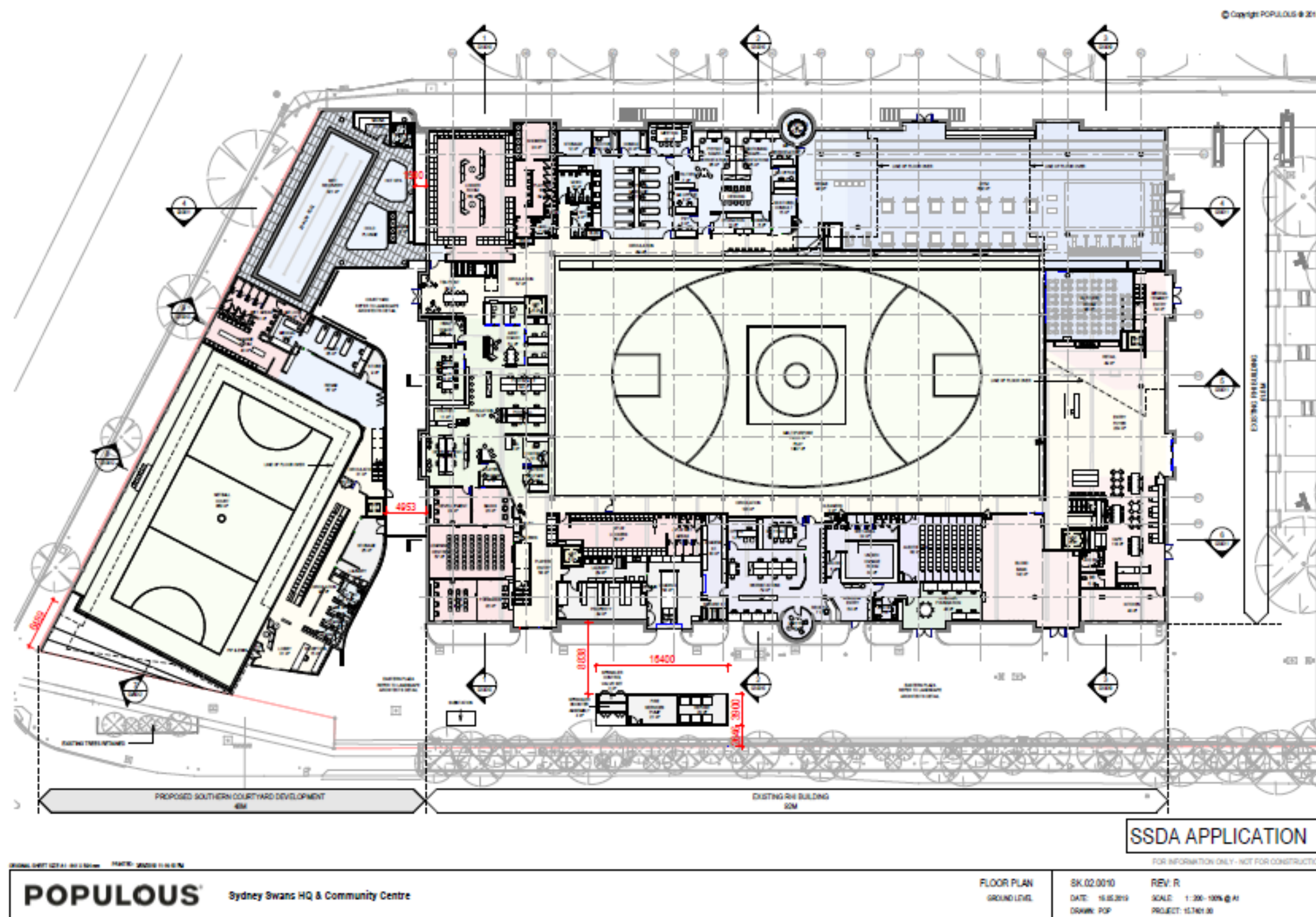


Figure 4-3 Proposed Floor Plan – Ground Level.
Populous May 2019. Drawing No. SK.02.0010 Rev R

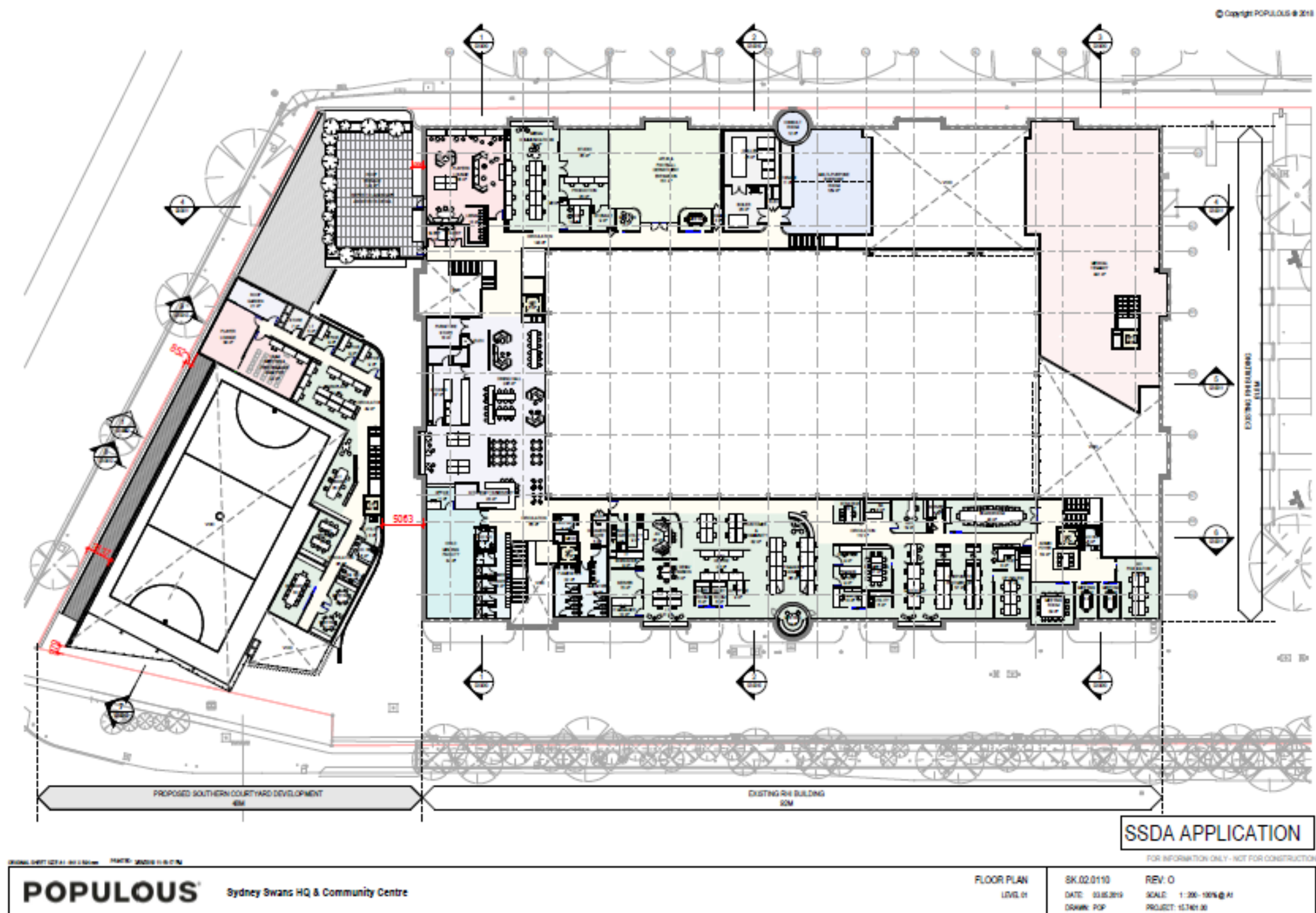


Figure 4-4 Proposed Floor Plan – Level 1.
Populous May 2019. Drawing No. SK.02.0110 Rev 0.

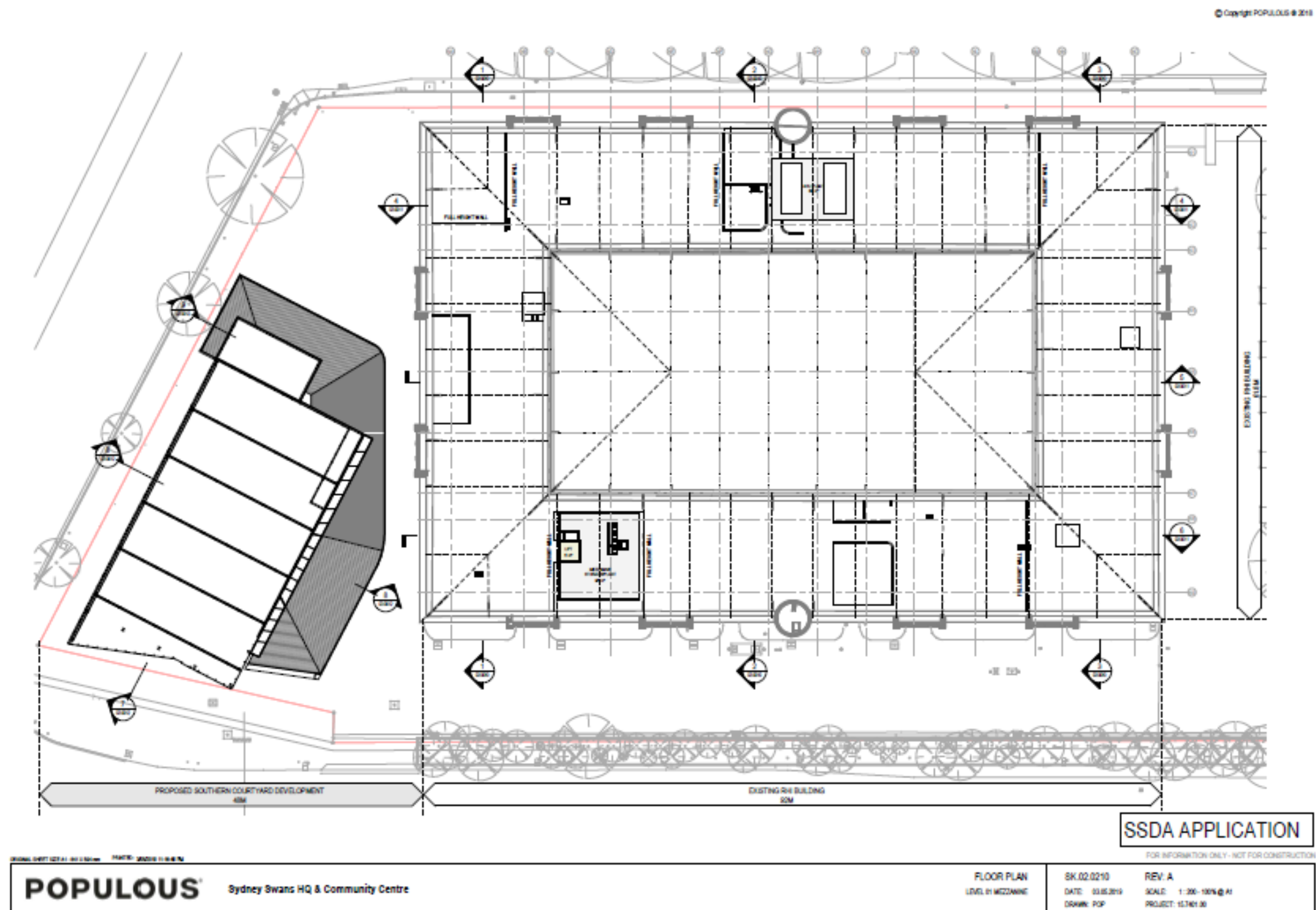


Figure 4-5 Proposed Floor Plan – Level 1 Mezzanine.
Populous May 2019. Drawing No. SK.02.0210 Rev A.

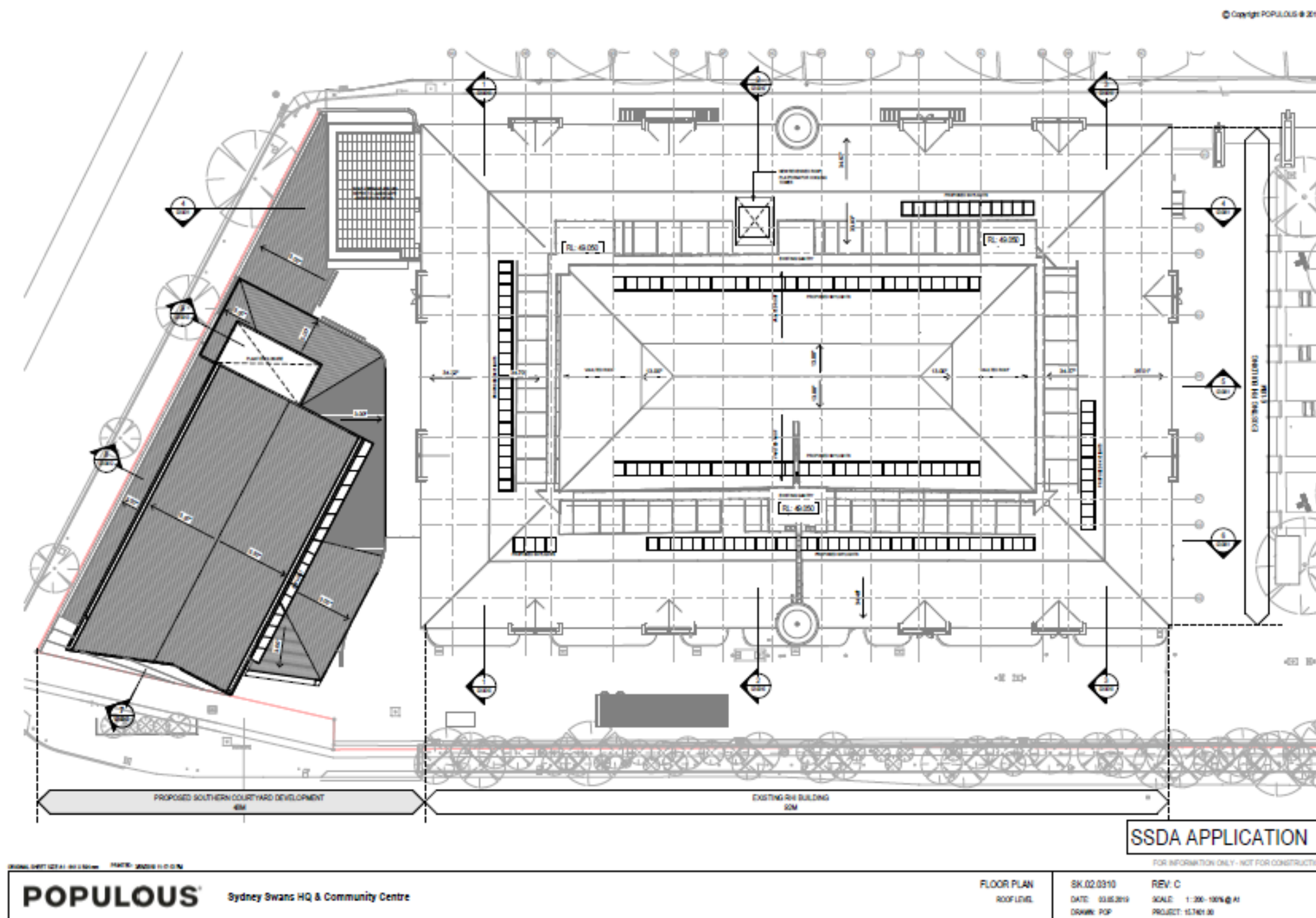


Figure 4-6 Floor Plan – Roof Level.
 Populous May 2019. Drawing No. SK.02. 0310. Rev C.

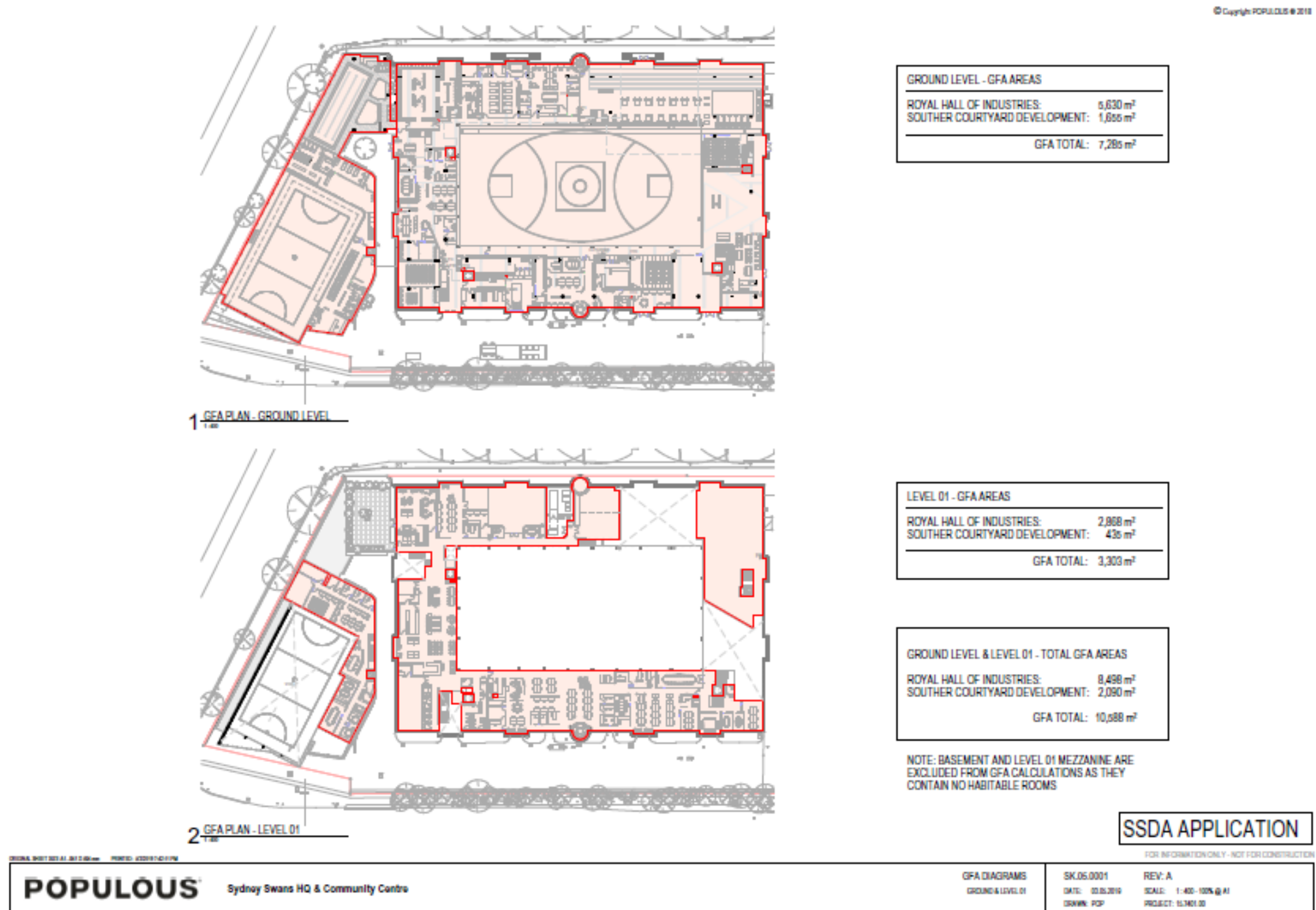


Figure 4-7 GFA Diagrams – Ground & Level 01.
Populous May 2019. Drawing No. SK.06. 0001. Rev A.

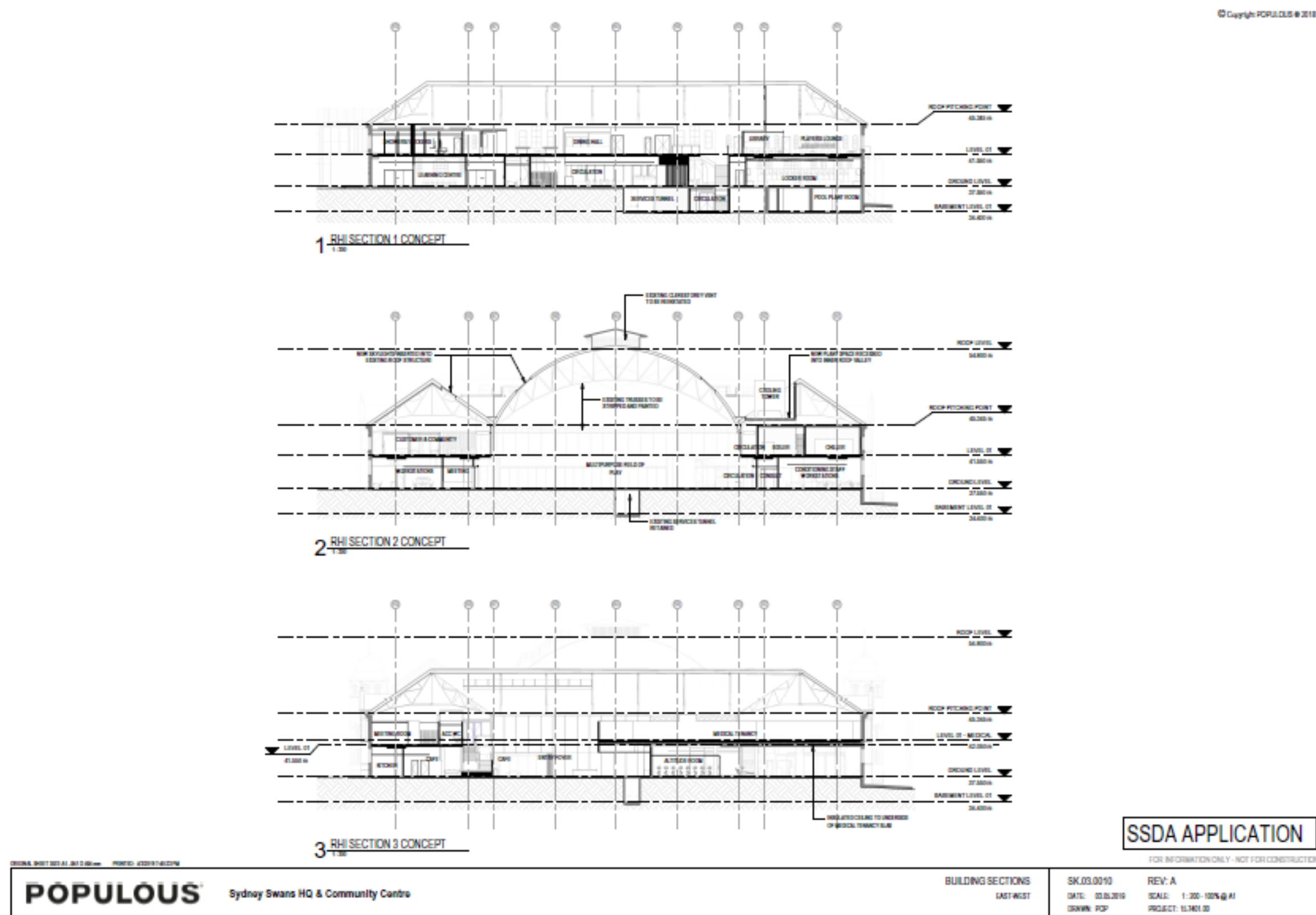


Figure 4-8 Building Sections – East - West.
Populous May 2019. Drawing No. SK.03. 0010. Rev A.

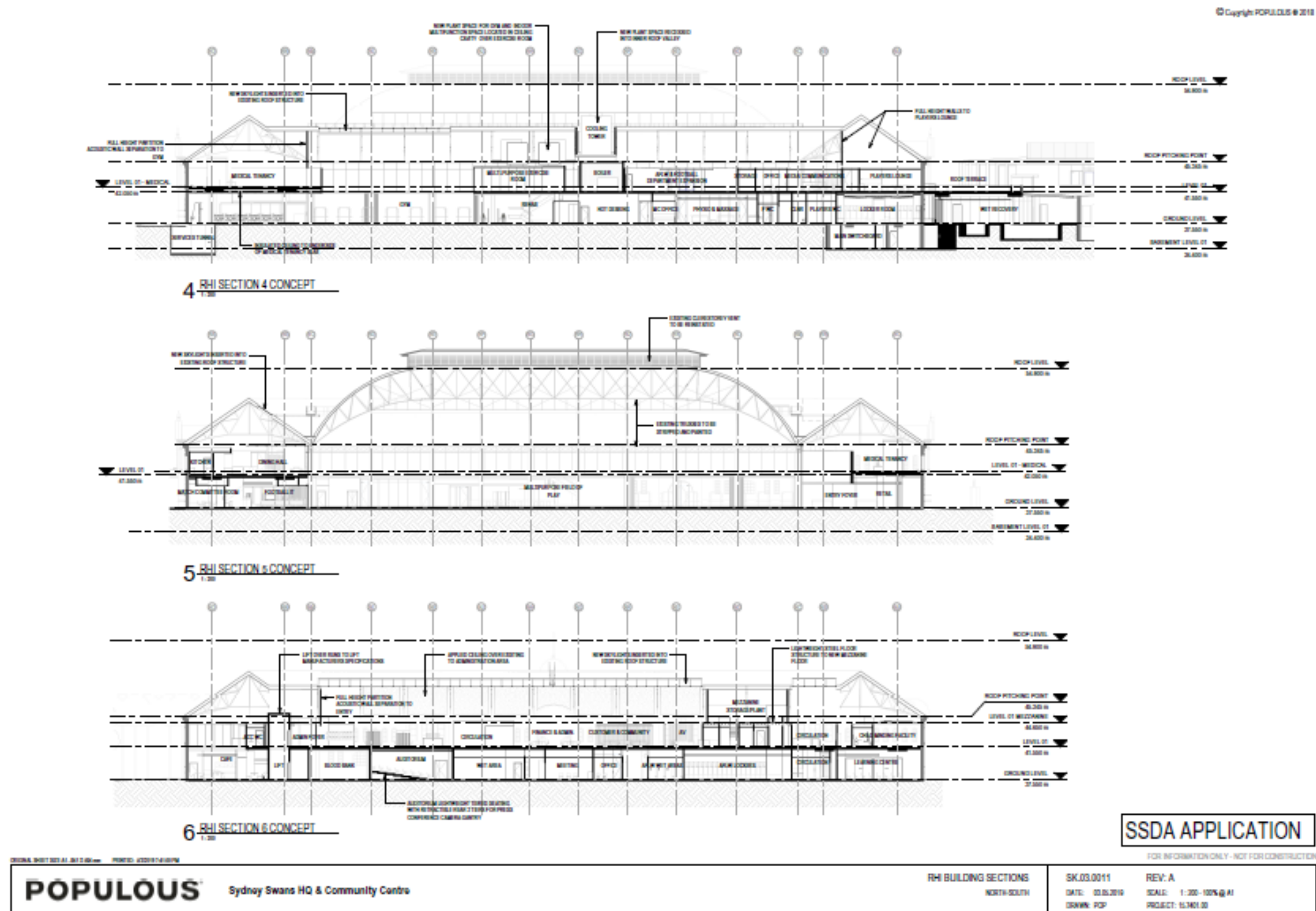


Figure 4-9 RHI Building Sections – North - South.
Populous May 2019. Drawing No. SK.03. 0011. Rev A.

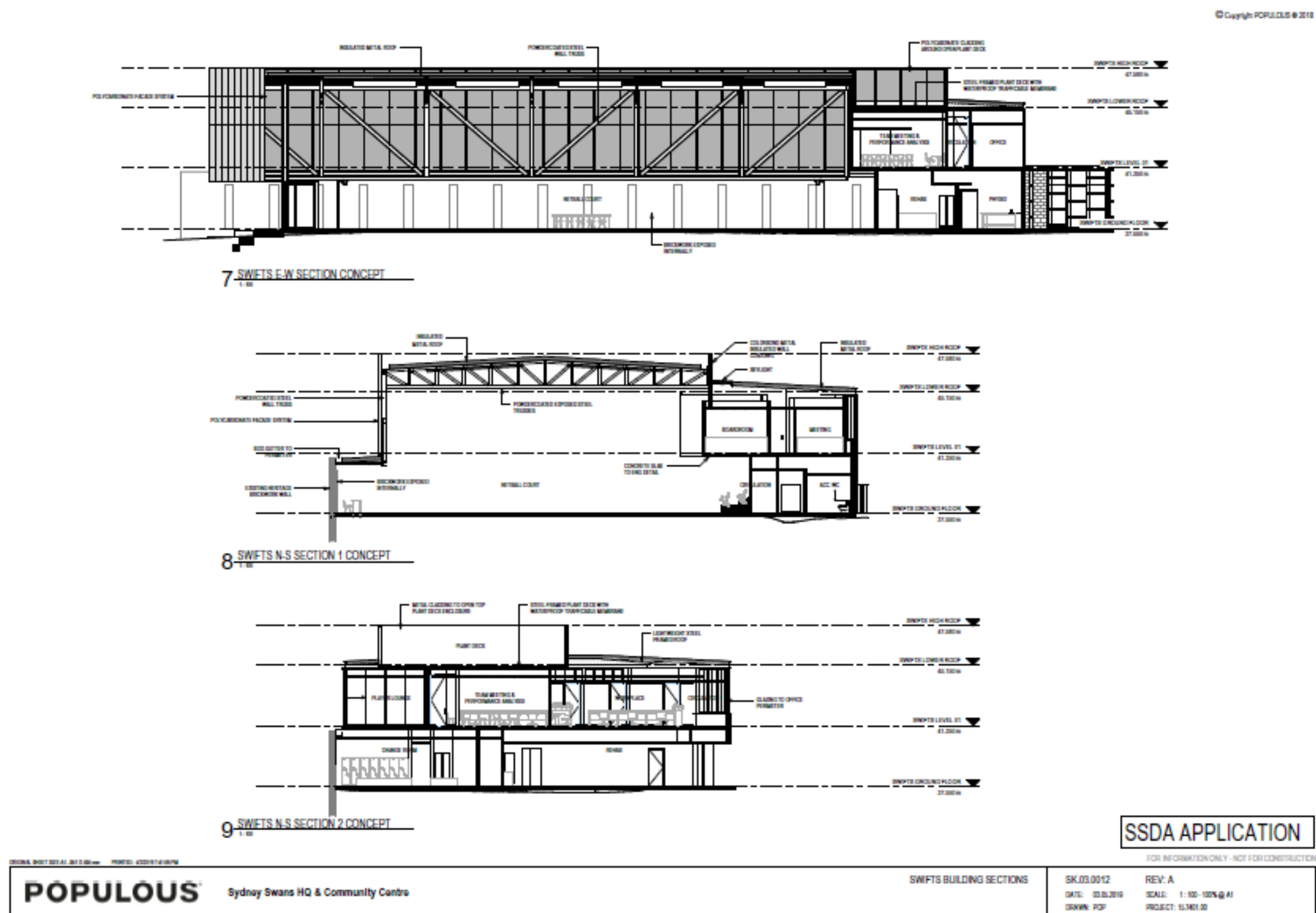


Figure 4-10 Swifts Building Sections.
Populous May 2019. Drawing No. SK.03. 0012. Rev A.

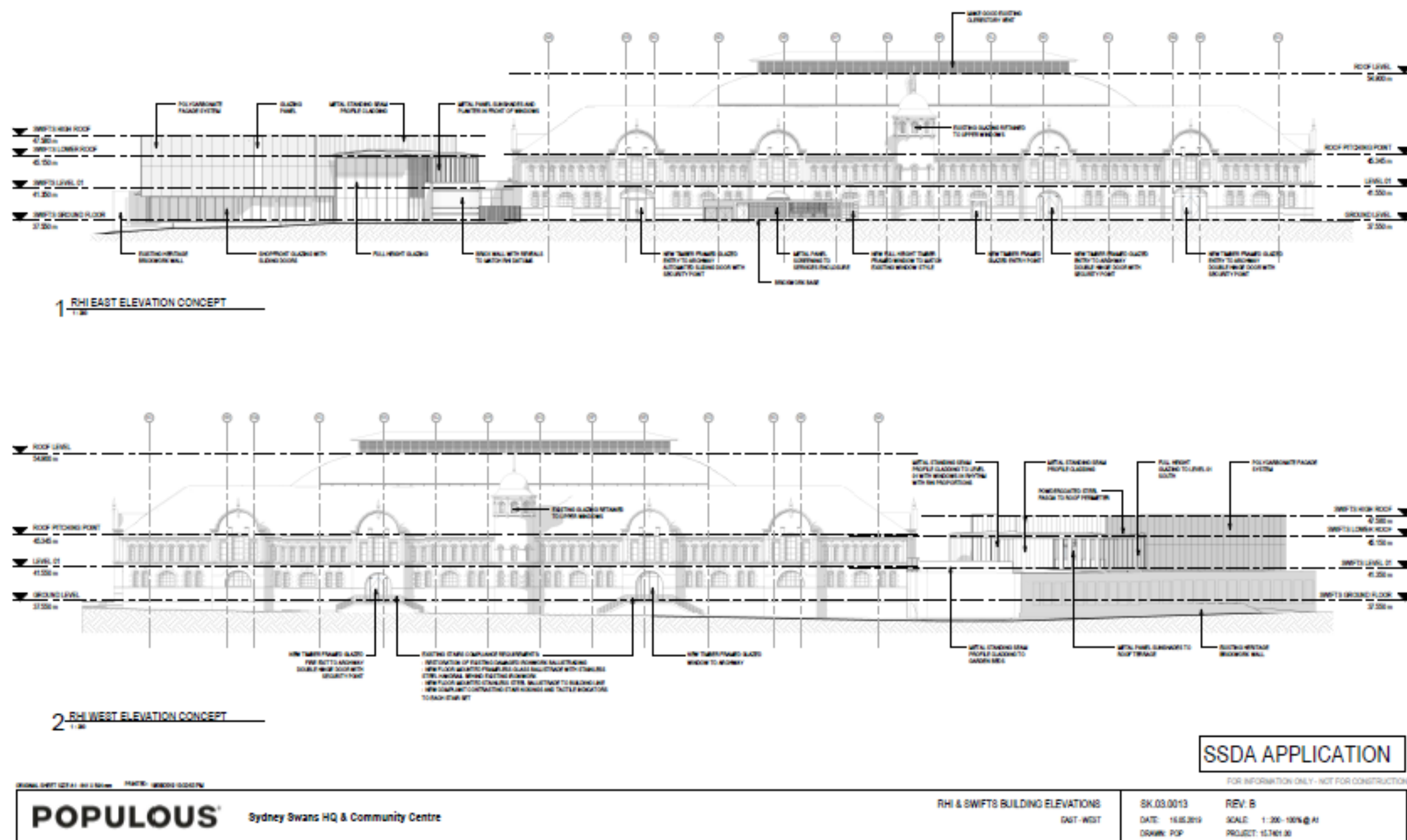


Figure 4-11 RHI & Swifts Building Elevations - East - West.
Populous May 2019. Drawing No. SK.03. 0013. Rev B.

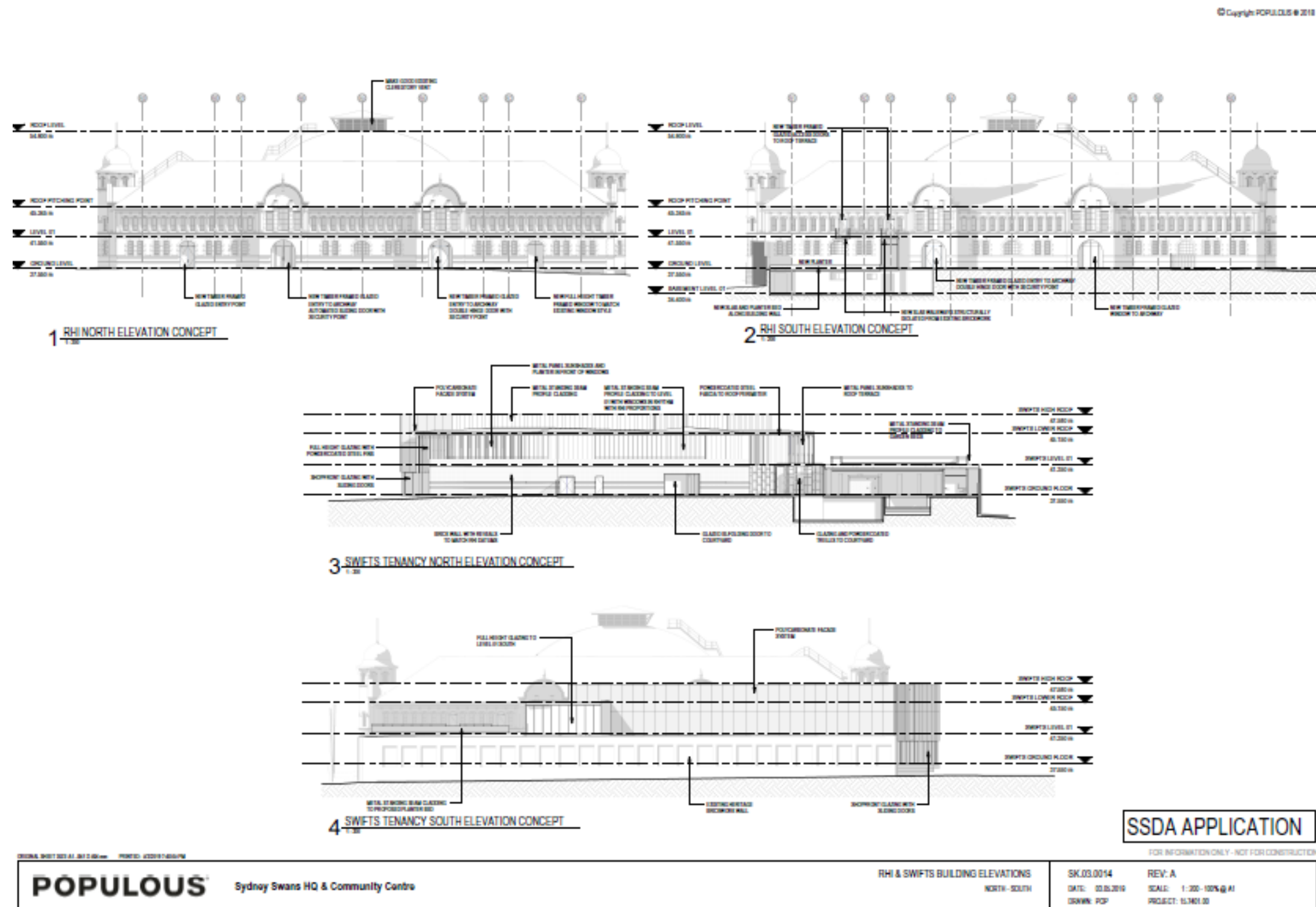


Figure 4-12 RHI & Swifts Building Elevations – North - South.
Populous May 2019. Drawing No. SK.03. 0014. Rev A.

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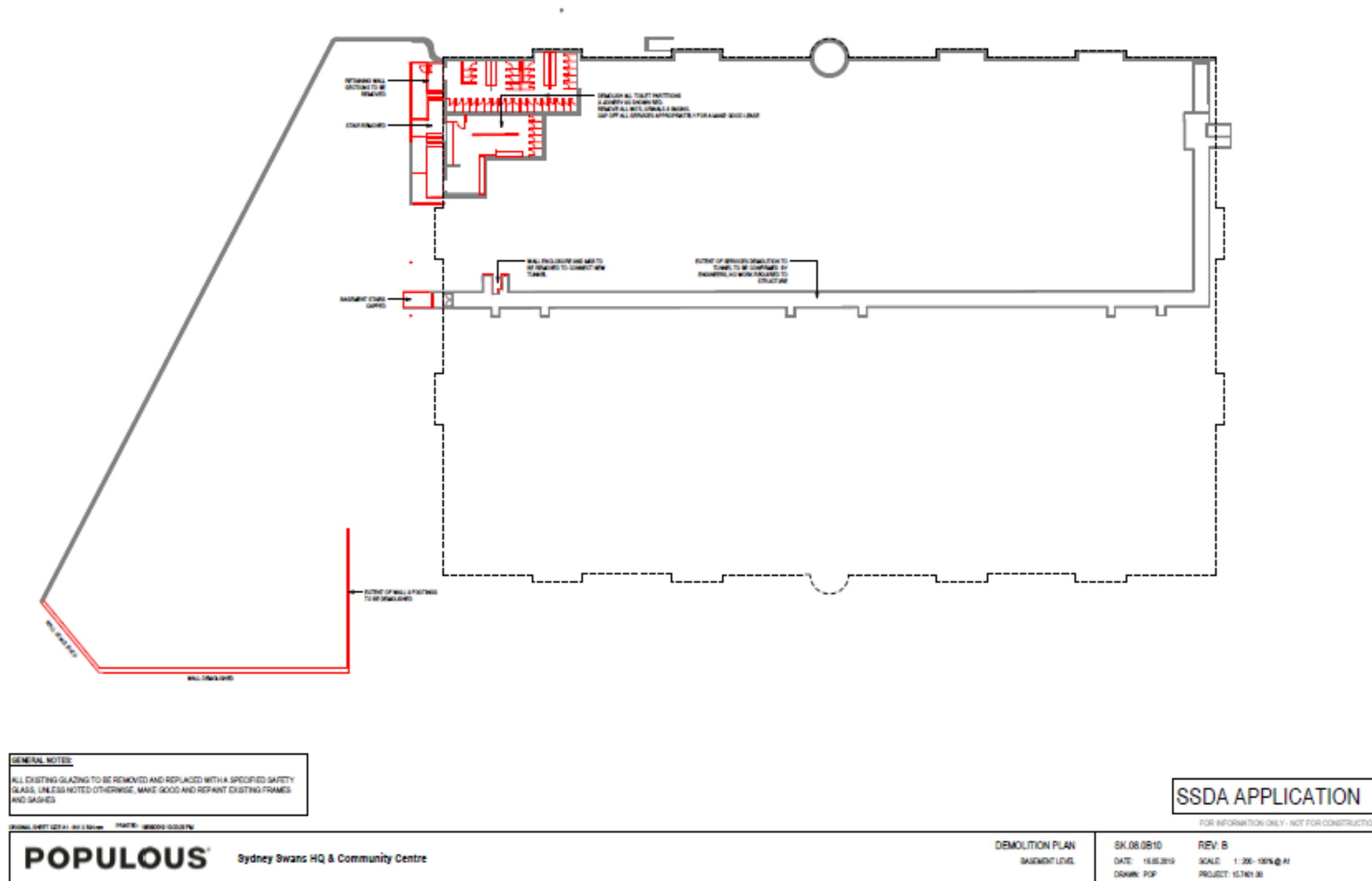
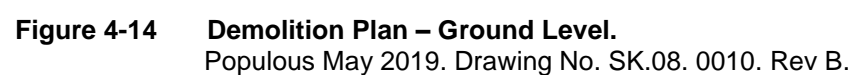
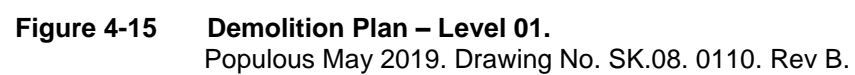
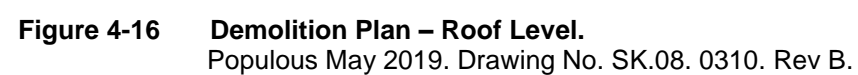


Figure 4-13 Demolition Plan – Basement Level.
 Populous May 2019. Drawing No. SK.08. 0B10. Rev B.







5.0 ENVIRONMENTAL CONTEXT

To adequately understand and assess the potential Aboriginal archaeological resource that may be present within the study area it is vital to understand the environment in which the Aboriginal inhabitants of the study area carried out their activities. The environment that Aboriginal inhabitants lived in is a dominant factor in shaping their activity and therefore the archaeological evidence created by this activity. Not only will the resources available to the Aboriginal population have an influence on the evidence created but the survival of said evidence will also be influenced by the environment.

The study area is located at the Centennial Parklands, which is part of the Sydney Basin. The environmental setting of the study area is outlined below.

5.1 TOPOGRAPHY

The study area extends over one topographic zone, the Tuggerah (tg) Soil Landscape (Figure 5.1). This soil landscape is an extensive dune system often located in the Botany Lowlands around Randwick, Botany, and South Sydney. Coastal examples are located at Bondi, Narrabeen, Palm Beach, Coogee, Brighton-le-Sands, Collaroy, Kyeemagh, Dolls, Point, Ramsgate, Monterey, and Rose Bay. This is an erosional landscape subject to extreme wind erosion in exposed areas where ground cover is absent. Low slopes and areas with maintained ground cover tend to have no appreciable erosion.

The topography consists of a series of undulating plains and rolling rises of level to gently inclined, broad swales and dunes. The local relief is usually <20m but can rise to elevations of 40m in at the dune-fields located at the northern part of the Botany Lowlands. Slopes are generally gradual to moderate inclines of 1-10%, although can occasionally increase to steep slope rises of up to 35%. Outcrops of Hawkesbury Sandstone are usually associated with steep slopes where wind-blown sand has banked up along the base of the rises. The presence of coastal dunes frequently run parallel to the coast in a north-south direction. Drainage lines usually occur from water run-off which collects in a series of lagoons, depressions, and swamps.

5.2 GEOLOGY AND SOILS

The geology of the study area consists of Quaternary marine sands of fine to medium grained quartz sand. There is an absence of shell fragments and the sand differs from sands found on foredunes and on beaches as it appears to be a finer grain.

The soils are found to be deep (>200 cm) Podzols around the dunes and Podzols/Humus Podzol intergrades around the swales. These are part of the Moore Park Sand Sheets where the deeper sand layers associated with the coffee rock (tg5), are dated to the late Pleistocene, between 30,000 to 40,000 BP (Attenbrow 2002:9-10). Grey-brown loamy sands are associated with the surrounding dunes. The swales generally consist of bleached greyish yellow to dull yellow orange loose sands and are closely associated at the capillary fringe of the water-table. Swales that are poorly drained have dark-brown to black earths of organic rich topsoil materials.

The following are typical soil profiles for the Tuggerah (tg) soil landscape;

Table 5-1 Description of dominant soil material

Soil Material	Soil Horizon	Description
tg1	A1 Horizon	Loose, speckled grey-brown loamy sand. Sand to loamy sandy with apedal structure and porous sandy fabric. Soil can range in colour from brownish-grey to brownish-black or black. Usually water repellent. Common is the presence of charcoal fragments and roots.
tg2	A2 Horizon	Bleached loose sand. Sand with apedal structure and porous sandy fabric. Soil can range in colour from greyish-yellow to dull yellow-orange. Stones and charcoal fragments are absent and roots are rare.
tg3	A2/B Horizon	Grey-brown mottled sand. Mottled sand or loamy sand with apedal structure and loose sand fabric. This subsoil occurs at areas of poor drainage. Soil can range in colour from brownish-grey to greyish-brown with faint grey mottles occurring more common with depth. Stones and charcoal fragments are absent and roots are rare.
tg4	B1 Horizon	Black soft sandy organic pan. Organic stained sand to loamy sand with apedal structure and sandy or earthy fabric. Soil can range in colour from black or brownish-black. Usually hard-setting on exposure. Charcoal, stones and roots are absent.
tg5	B Horizon	Brown soft sand iron pan. Iron stained sand to loamy sand with apedal structure and sandy or earthy fabric. This subsoil is generally known as coffee rock. Soil can range in colour from bright yellowish-brown to brown. Orange and dark brown mottles are common. Usually hard-setting on exposure. Stones and charcoal fragments are absent and roots are rare.
tg6	B/C Horizon	Yellow massive sand. Sand to clayey sand with apedal structure and sandy or earthy fabric. Soil can range in colour from light yellow to dull yellow-orange. Charcoal fragments, stones and roots are absent.

5.3 WATERCOURCES

The study area lies to the northwest of an extensive wetland system. This is a freshwater wetland system within Centennial Park, which includes the Lachlan Swamps where the run-off from drainage lines and dune swales would have accumulated. Before European settlement these wetland systems would have been a significant freshwater and resource area. A number of ponds with manmade dams and walls to contain them are dispersed across the Centennial Parklands. Kippax Lake is ca. 550m to the northwest and Busbys Pond (ca.420m), Randwick Pond (ca. 960m), Duck Pond (ca. 1.05km),

Willow Pond (ca. 1.35km) and Fly Casting Pond (ca. 1.375km) all of which are located to the southeast of the study site (Figure 5.2).

5.4 VEGETATION

There is no native vegetation in the study site. These lands were cleared soon after European settlement with much of the timber felled by the mid-1800s. The lands were later heavily modified during the establishment of the Centennial Parklands.

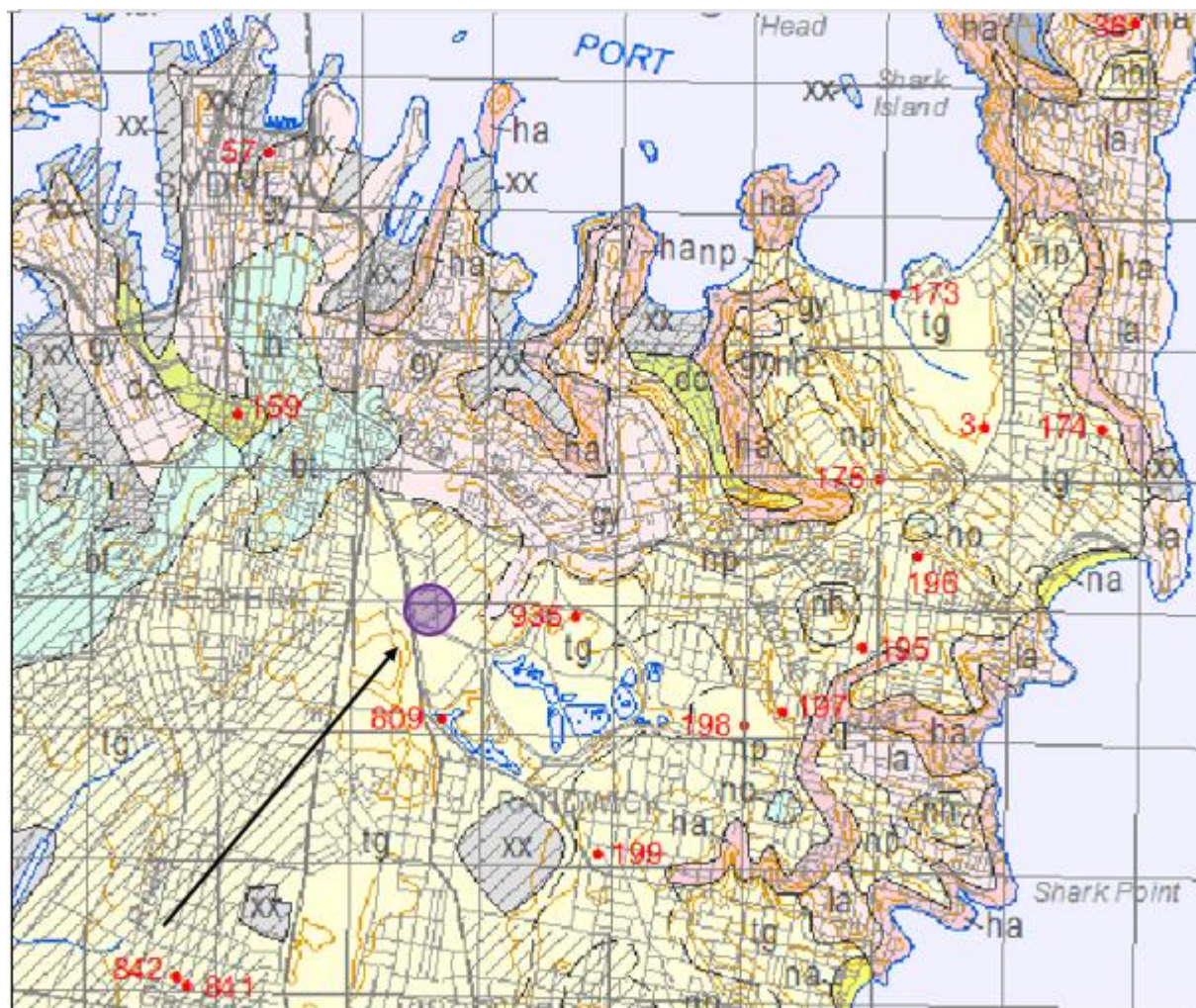


Figure 5-1 Study area on soil map.
Study area indicated by purple circle and black arrow. Chapman et al (1989).

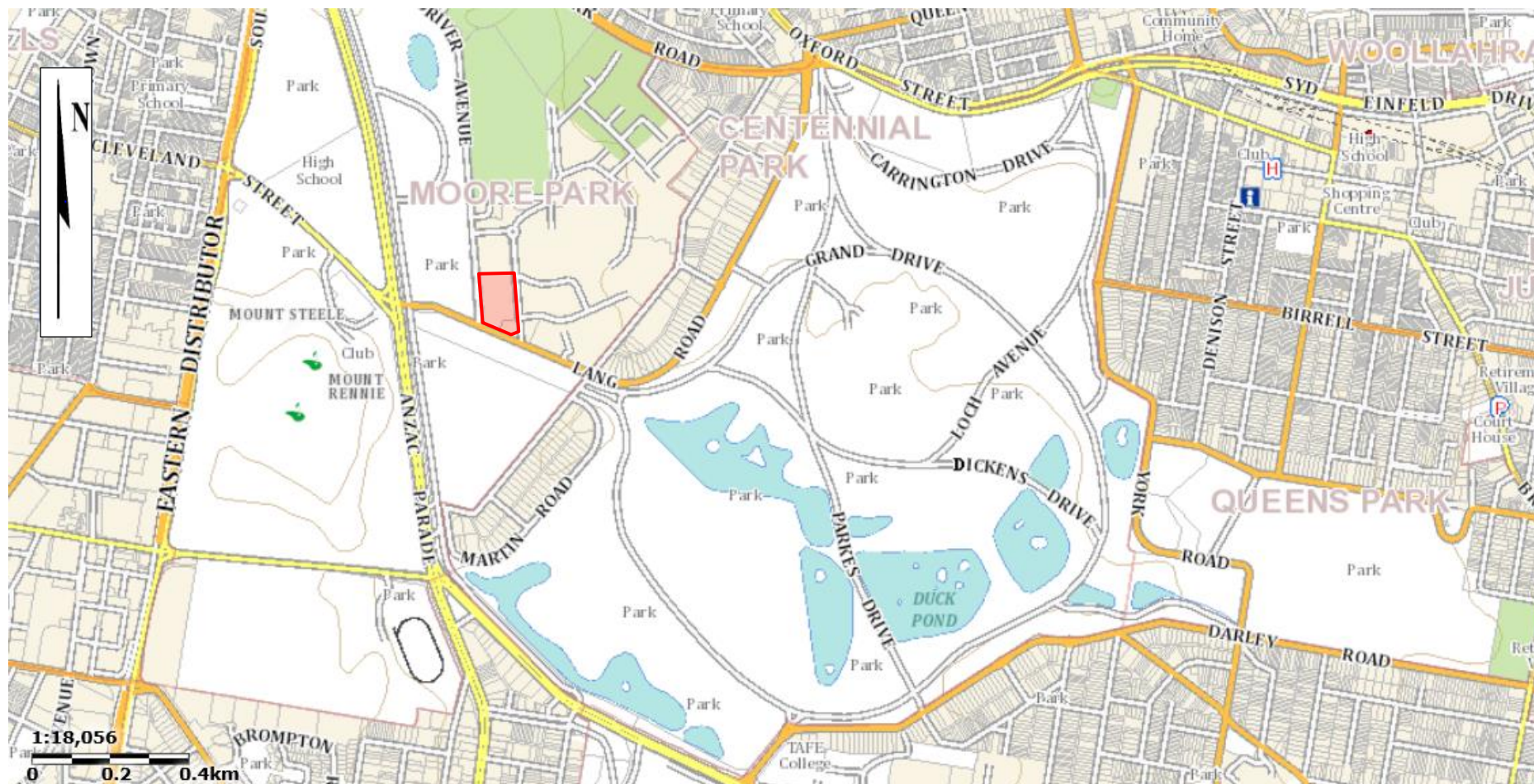


Figure 5-2 Topographic Map indicating watercourses in blue.
Study site indicated by pink fill, Six Maps, LPI Online (2019).

5.5 GEOTECHNICAL REPORT

Geotechnical investigations were undertaken on the 21st February 2019 by Douglas Partners Pty Ltd. This investigation involved the drilling of sixteen boreholes (BH101 to BH116). Boreholes were drilled by a track-mounted drilling rig to depths of 0.9 m to 10.1 m. to bedrock (three of which BH101, BH108 and BH109 were extended into bedrock) with soil samples collected at regular depth intervals. During the course of the investigation the installation, development and measurement of three groundwater monitoring wells (in BH101, BH108 and BH109) were also undertaken.

Each borehole was found to comprise of the following soil profile (Douglas Partners 2019);

Concrete /Asphaltic Concrete - Concrete and asphaltic concrete at ground surface to depths of 0.02 - 0.4 m in all boreholes.

Fill - Fill to depths of 0.5 - 5.2 m at all borehole locations. The fill generally included varying proportions of sand and gravel. The gravel was typically crushed sandstone or igneous gravel. Some of the fill also had components of clay, silt, concrete, steel, plastic, ceramic tile fragments, glass, ash, coke, charcoal and coal.

Natural Sand / Clayey Sand - Natural sand and clayey sand at depths of between 1.1 - 4.5 m in boreholes 103, 108 and 109 only. Typically, pale yellow and yellow-brown mottled grey and fine to coarse grained.

Sandstone - Sandstone from depths of 0.5 - 5.2 m to borehole termination at all locations. Strength typically increased with depth from extremely low strength to medium and high strength. Some medium and high strength ironstone bands were present within the upper extremely low strength layers.

In review of the borehole logs, there is indication of there being high disturbance throughout the study area. Natural deposits have been identified as being present within the study area in BH103, BH108 and BH109. The depth of the clayey sand deposit ranges between 1.1 – 4.5 m. This deposit could be interpreted as an A2 horizon of the Tuggerah soil profile with the potential for there to be a remnant A horizon. Past investigations in the region found these top soil horizons to be artefact bearing deposits. Of the 3 boreholes with Natural Sand/Clayey Sand soil profiles only BH109 is located within proposed subsurface excavation work for the accommodation of a pool/wet area. Therefore, there is a potential for artefacts to be located within the study area.

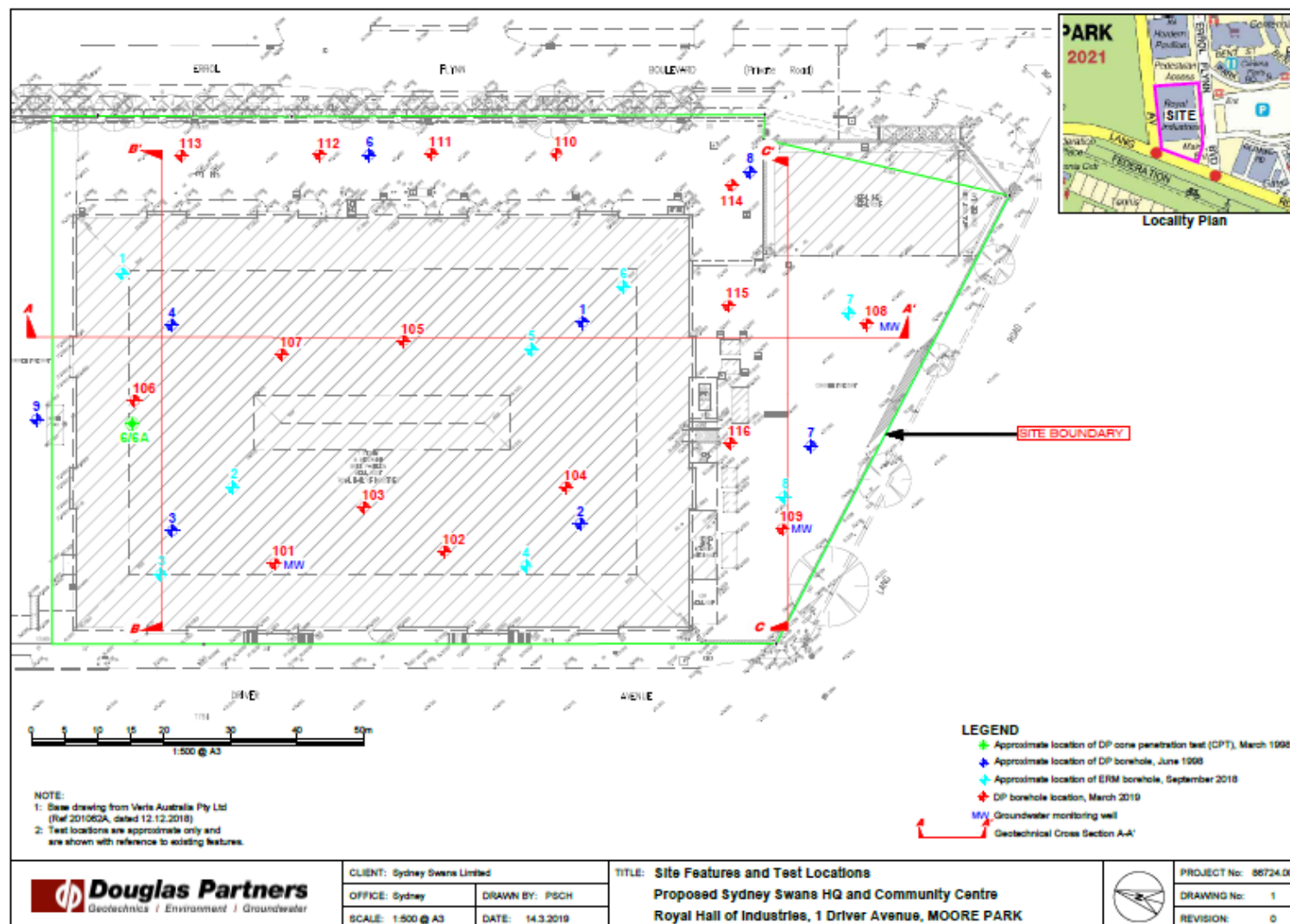


Figure 5-3 Geotechnical borehole location map.
 Douglas Partners (2019).

6.0 RESEARCH CONTEXT

Pre-field work research consisted of an analysis and synthesis of the background data to determine the nature of the potential archaeological and cultural heritage resource in the region.

The research of this cultural heritage assessment consisted of stages which are listed below:

- Background research;
- Aboriginal consultation and oral history interviews;
- Site inspection and cultural heritage mapping;

Background research entailed a detailed review of sources of information on the history, oral history, ethnohistory and archaeological background of the study area and surrounds and will include but not be limited to material from:

- OEH archaeological assessment and excavation reports and cultural heritage assessments;
- OEH Library;
- State Library of NSW including the Mitchell Library;
- Local libraries and historical associations;
- National Library of Australia.

A search of the OEH AHIMS was undertaken and the results examined. The site card for each site within 1000m in all directions from the centre of the study area was inspected (where available) and an assessment made of the likelihood of any of the sites being impacted by the proposed development. The OEH library of archaeological reports (Hurstville) was searched and all relevant reports were examined. Searches were undertaken on the relevant databases outlined in Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974, (DECCW 2010);

Further to this the following sources were examined:

- The National Heritage List;
- The Commonwealth Heritage List;
- The NSW State Heritage Inventory;
- The National Native Title Register;
- The Register of Declared Aboriginal Places;
- Prevailing local and regional environmental plans;
- Environmental background material for the study area.

6.1 THE CADIGAL AND WANGAL NATION

It is estimated that around 250 distinct languages were in use throughout the Australian continent at the time of contact. The exact number cannot be known for certain, however 250 is a conservative estimate. These languages fell within two language groups; the *Pama-Nyungan* and *Non Pama-Nyungan* languages. Knowledge of the different language groups in a given area is variable. Early European recordings noted the names of

particular Aboriginal individuals and groups but were not always clear about which named groups represented a language rather than some other social grouping (Hardy and Streat 2008).

The Cadigal and Wangal extended from Darling Harbour to South Head, including some of the lower parts of Port Jackson. Within these large language groups resource access and ownership was centred on extended family groups or 'clans' which appear to have had ownership of land. As it was unlikely to be acceptable to find sexual partners within the family grouping and for other reasons such as resource sharing, a number of clans would often travel together in a larger group.

These groups are referred to as *bands*. Whether the clan or the band was the most important group politically to an individual is likely to have varied from place to place. Group borders were generally physical characteristics of the landscape inhabited, such as waterways or the limits of a particular resource. Groups also shared spiritual affiliations, often a common dreaming ancestor, history, knowledge and dialect.

A wide variety of activities comprised the lifestyle of the Aboriginal groups across the Cumberland Lowlands and Sydney Basin. Some behaviours leave traces which can be retrieved by archaeological study of material remains. Many of these can only be reconstructed by oral history, observations of European explorers and ethnologists, and other forms of past recording such as photography or art. Some of the details of the complexity and sophistication of the past lifestyles of Aboriginal people in the area have been lost, but many can be reconstructed using the sources available.

6.2 ARCHAEOLOGICAL CONTEXT

It is generally accepted that Aboriginal occupation of Australia dates back at least 40,000 years (Attenbrow 2002 p.20 - 21 & Kohen et al 1983). The result of this extensive and continued occupation which includes the Sydney region has left a vast amount of accumulated depositional evidence and the Cumberland Lowlands is no exception. The oldest date generally considered to be reliable for the earliest occupation around the region comes from excavations at Parramatta which contain objects or features which have been dated to 30,735 ± 407 BP (McDonald et al 2005).

The majority of reliably dated archaeological sites within the region are less than 5,000 years old which places them in the mid to late Holocene period. A combination of reasons has been suggested for this collection of relatively recent dates. There is an argument that an increase in population and 'intensification' of much of the continent took place around this time, leading to a great deal more evidence being deposited than was deposited as a result of the sparser prior occupation period. It is also the case that many archaeological sites along the past coastline may have been submerged as the seas rose approximately to their current level around 6,000 years ago. This would have had the effect of covering evidence of previous coastal occupation. In addition, it is also true that the acidic soils which are predominate around the Sydney region do not allow for longer-term survival of sites (Hiscock 2008 p. 106).

Different landscape units not only influence the preservation of sites but can determine where certain site types will be located. Across the whole of the Sydney Basin, the most common Aboriginal archaeological site type is occupation evidence within Rock Shelters. However, the most common Aboriginal archaeological site type in the Cumberland Lowlands is Open Artefact Scatters or Open Campsites, which are locations where two or more pieces of stone show evidence of human modification. These sites can sometimes be very large, with up to thousands of artefacts and include other habitation

remains such as animal bone, shell or fireplaces [known as hearths] (Attenbrow 2002 p. 75 – 76).

6.3 PREVIOUS ARCHAEOLOGICAL STUDIES WITHIN THE STUDY AREA

As part of the research process of this report the library of archaeological assessments, test excavation and open area salvage excavation reports which is located at the offices of DECCW at Hurstville was consulted. Presented below are summaries of indigenous archaeological survey assessments which have been carried. This list is by no means exhaustive and is merely a representative sample of the most recent archaeological activity within the vicinity of the study area.

Archaeological Management & Consulting Group (AMAC) & Streat Archaeological Services (SAS), (2017) – Aboriginal Archaeological Assessment - 5-19 Bank St. Pyrmont

In 2017, AMAC Group and SAS prepared an Aboriginal Archaeological Assessment for Modification 3 of the proposed occupation of the Wharf/Marina and associated land-based works for the Bank Street Commercial Wharf Project. This assessment was in response to the Secretary's Environment Assessment Requirements (SEARs) No. MP 11_0001 MoD 3, to which it fulfilled the requirement of key issue no.17 Heritage. The landscape was identified as being heavily disturbed with the site located on reclaimed land. Prior to reclamation works the site would have been intertidal flats. It was recommended that no further archaeological and cultural assessment in accordance with Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974 (DECCW, 2010) was necessary and the proposed development activity should be able to proceed with caution.

AMAC Group & SAS (2017) – Archaeological Survey Report – 210-220 George Street, Sydney

In November 2017, AMAC Group and SAS were commissioned by Urbis Pty Ltd on behalf of TSA Management to prepare an Archaeological Survey Report for the proposed commercial development at 210-220 George Street, Sydney. AMAC Group and SAS engaged with the Metropolitan Local Aboriginal Land Council (MLALC) for the preparation and review of this report. The background analysis and archaeological context of the site survey revealed that the landscape has been heavily disturbed with the site located on reclaimed land. Prior to reclamation works the site would have been an intertidal zone. Based on this information, the disturbed nature and significant land modifications made to the site, indicated that there was no intact top soil (A horizon) – the layer of soil in which Aboriginal archaeological or cultural material would be located if present. It was recommended that no further archaeological and cultural assessment in accordance with Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974 (DECCW, 2010), is necessary and the proposed development activity should be able to proceed with caution.

Artefact Heritage (2014) – Aboriginal Heritage Management Assessment – CBD and South East Light Rail Project: Construction Heritage Management Plan for the Moore Park Works

In 2014, as part of the CBD and South East Light Rail Project (CSELR), Artefact Heritage carried out an Aboriginal Heritage Impact Assessment at Moore Park. The study investigated the Tramway Oval and Tennis Centre, to the north of the study site, as part of the investigation of the Moore Park Works. Based on geotechnical

investigations at the Tramway Oval, the following archaeological implication was concluded. Due to the removal of the upper sand layers that may have contained Aboriginal objects, it is likely that the site is culturally sterile and Aboriginal archaeological test excavation not warranted.

Godden Mackay Logan (2013) – Aboriginal Heritage Management Assessment – CBD and South East Light Rail Project – Environmental Impact Statement: Heritage Impact Assessment

In 2013, as part of the Heritage Impact Statement for the CBD and South East Light Rail Project (CSELR) Environmental Impact Statement, Godden Mackay Logan (GML) carried out an Aboriginal Archaeological Management Assessment along the CSELR route. The study site was not investigated as part of the Moore Park precinct. GML used Aboriginal Archaeological Management Zones (GML 2013:108-111) to identify archaeological sensitivity along the entire CSELR route with Zones 1, 2, and 3 being recommended to conduct Aboriginal archaeological investigation that may include testing/salvage excavations. Zone 4, however, recommends that no further assessment or physical investigation of Aboriginal archaeology is required due to the large-scale land modifications.

AMAC Group & SAS (2012) – Aboriginal Archaeological Assessment – 316-332 Burns Bay Road, Hunters Hill, Lane Cove

In January 2012, SAS in conjunction with AMAC Group conducted an Aboriginal Archaeological Assessment for Mosca Pserra Architects on behalf of Tuta Properties for the proposed residential development at 316-332 Burns Bay Road, Hunters Hill. There were no relevant confirmed site records or other undisturbed associated landscape feature information located within the study area or on the Aboriginal Heritage Information Management System (AHIMS). The background analysis of the environmental and archaeological context revealed that the study area was unlikely to contain Aboriginal deposits or objects due to significant disturbance throughout the study area and as such no further archaeological assessment was recommended.

Cultural Heritage Connections, (2007) – Indigenous Archaeological Investigation for Proposed Upgrade of Beare Park & Kings Cross Rotary Park, Elizabeth Bay

In May 2007, Cultural Heritage Connections were commissioned to conduct an Indigenous archaeological investigation of potential impacts from the proposed upgrade of the Beare Park & Kings Cross Rotary Park, Elizabeth Bay. The assessment identified that the study site was located within reclaimed land suggesting the highly disturbed context of the area and therefore concluded no impediment to the proposed development on Aboriginal archaeological grounds.

Dominic Steele Consulting Archaeology (2006) – Aboriginal Heritage Assessment – Randwick Racecourse, Randwick NSW

In 2006, Dominic Steele Consulting Archaeology was commissioned to prepare an Aboriginal heritage assessment as part of a conservation management plan for Randwick Racecourse. It is reported that the site has had widespread environmental and landscape modification and subsequently concluded that due to the high disturbance levels it was unlikely that any surface and/or subsurface Aboriginal archaeological evidence would be located across most of the site. However, it was advised that a large sand dune to the southeast of the racecourse with a height of over 20m may have archaeological evidence in deeper sand dune contexts, possibly as much as several thousand years old, and was identified as high Aboriginal archaeological sensitivity.

Jo McDonald Cultural Heritage Management (2005) – Archaeological Testing and Salvage Excavation – Discovery Point, NSW

In 2005, Jo McDonald Cultural Heritage Management conducted excavations at Discovery Point to the southwest area of Tempe House. The excavation was divided into three phases during the course of archaeological activities; 1) across the proposed carpark, backhoe testing to the water-table depth to establish whether intact cultural material present; 2) If stone artefacts identified during backhoe work, test pits to be hand excavated; and 3) to retrieve a sample of cultural materials for analysis, open area salvage excavations. A number of intact natural soil horizons were located consisting of black sand, a light grey sand layer, overlaying a mottled sand/coffee rock. Three hundred and eighty-nine artefacts were excavated the majority recovered from the light grey sand layer.

It was concluded that the site constituted an extensive, low density artefact scatter. The excavation of a charcoal feature that was subsequently radiocarbon dated was calibrated to ca. 10,7000 BP and classified as the earliest date of Aboriginal occupation along the Sydney Basin's eastern coastal strip. As a result, it was suggested that people have been repeatedly visiting Discovery Point, for thousands of years.

Australian Museum Business Services (2002) – Aboriginal Archaeological Assessment – Centennial Parklands Conservation Management Plan

In 2002, Australian Museum Business Services (AMBS) prepared an Aboriginal archaeological assessment as part of an investigation for Aboriginal land and resource use in Centennial, Moore and Queens Parks for the Centennial Parklands Conservation Management Plan. The assessment discussed previously identified Aboriginal sites, including a rock-shelter with 27 white human hand stencils at Queens Park, rock engravings (now destroyed) at Darvall Street and one artefact found at the Sydney Cricket Ground which is now stored at the Australian Museum collection.

AMBS indicated that it is likely that Aboriginal archaeological evidence may survive in areas beneath buildings, ponds, and landfill that are now present across the Centennial Parklands. The assessment also suggested that it is possible that additional rock engravings may have been exposed in areas of currently covered sandstone outcrops during periods in the past when these outcrops were exposed.

Godden Mackay Heritage Consultants (1997) – Aboriginal Archaeological Monitoring – Eastern Distributor, Moore Park NSW

In 1997, Godden Mackay conducted Aboriginal archaeological monitoring along the western boundary of Moore Park. The test pits were excavated to a depth of 2.2m and resulted in no evidence of Aboriginal habitation. The investigation indicated that this area of Moore Park was highly disturbed with introduced fill between 40cm and 150cm present across the site.

In addition, the report included details from geotechnical investigations conducted during the construction of the Eastern Distributor in the Moore Park Precinct. The results of these investigations indicated that fill between 1m and 4.7m deep extended along some parts of Moore Parks' western end. South of the Moore Park Precinct (south of Charles St. Redfern), sand dunes between 15m to 20m thick were reported. Close to Charles Street, lake deposits and freshwater swamp peat was located in the A Horizon between 1m to 3m thick and 13m to 17m below the present ground level and increasing to 5m below ground level in the vicinity of Maddison Street.

Godden Mackay Pty Ltd and Austral Archaeology Pty Ltd (1995) – Aboriginal Archaeological Assessment – Prince of Wales Hospital Excavation, NSW Department of Health

In 1995, Godden Mackay (GM) and Austral Archaeology (AA) prepared an Aboriginal Archaeological Assessment as part of a historical archaeological excavation at the

Prince of Wales Hospital. During the historical excavations three roughly circular shaped hearths with burnt sandstone manuports were identified. Carbon 14 dating and thermoluminescence were used to date one of the hearths (Feature 203) and dated to 7860 +/- 50 BP and 8400 +/- 800 BP respectively. In addition, residue analysis on one of the hearth stones from Feature 203 indicated high amounts of fatty acids probably belonging to a freshwater fish that had been cooked on this hearth.

Additional sandstone manuports were also identified though not clearly associated to a defined hearth. The report indicated that these sandstone manuports are evidence of local Aboriginal occupation based on the 'assumption that pieces of stone in an aeolian sand dune can have no method of transport other than human' (GM & AA 1995: 29). Ten flaked artefacts of white, banded indurated stone (unknown source) were also identified during the excavations, with the report noting the unusual absence of silcrete. The report suggested that the small number of flaked stone artefacts indicates that the site was probably a short-term settlement and subsistence type formed under conditions of high human mobility (GM & AA 1995: 40).

Crew, David (1991) – Aboriginal Archaeological Assessment – Archaeological Survey for Aboriginal Sites of the Botany Wetlands, Sydney NSW

In 1991, David Crew conducted an Aboriginal Archaeological Assessment within the Botany Wetlands. The report identified that the Lachlan Swamps System, which extends across much of the Centennial Parklands provided a significant freshwater resource area flanked by 25m sand dunes and in close proximity to the sheltered estuary at Botany Bay for Aboriginal occupation. It concluded that Aboriginal archaeological evidence such as occupation and burial sites have the potential to survive in areas which are less disturbed during historical settlement activities Crew also reports on the 1982 Aboriginal skeletal remains that were identified in the Botany Wetlands at Eastlakes Golf Course.

6.4 AHIMS SEARCH RESULTS

The Archaeological Heritage and Information Management System Database (AHIMS) is located at the OEH Offices at Hurstville in New South Wales. This database comprises information about all the previously recorded Aboriginal archaeological sites registered with OEH. Further to the site card information that is present about each recorded site, the assessments and excavation reports that are associated with the location of many of these sites are present in the library of reports.

The location of these sites must be viewed as purely indicative as errors in the recording of the locations of sites often occurs due to the disparate nature of the recording process, the varying level of experience of those locating the sites and the errors that can occur when transferring data. If possible, sites that appear to be located near a study area should be relocated.

An AHIMS extensive search was conducted on the 9th February 2019 (ID 397773). This search resulted in 25 registered sites, 3 of which were located within 1000 m of the study area. The following table is comprised of the results listed from the extensive search.

Table 6-1 AHIMS Search Results

Site ID	Site name	Site status	Site features
45-6-2597	Wynyard St Midden	Valid	Shell: Artefact
45-6-0647	Centennial Park	Valid	Art (Pigment or Engraved)
45-6-2580	Junction Lane	Valid	Artefact

Site ID	Site name	Site status	Site features
45-6-0675	Randwick Queen's Park Waverley	Valid	Art (Pigment or Engraved)
45-6-0898	Woollahra;	Valid	Art (Pigment or Engraved)
45-6-2637	George street 1	Valid	Artefact
45-6-2651	William St PAD	Valid	Potential Archaeological Deposit (PAD)
45-6-2652	Ultimo PAD 1	Valid	Potential Archaeological Deposit (PAD)
45-6-2666	Wattle Street PAD 1	Valid	Potential Archaeological Deposit (PAD)
45-6-2663	Mountain Street Ultimo	Valid	Artefact: Potential Archaeological Deposit (PAD)
45-6-2680	Broadway Picture Theatre PAD 1	Valid	Potential Archaeological Deposit (PAD)
45-6-2687	Crown Street PAD 1	Valid	Potential Archaeological Deposit (PAD)
45-6-2897	Queens Park PAD (duplicate see 45-6-2896)	Valid	Potential Archaeological Deposit (PAD) 1
45-6-2896	Queens Park PADs	Valid	Habitation Structure: 1 Potential Archaeological Deposit (PAD): 1
45-6-2979	UTS PAD 1 14-28 Ultimo Rd Syd	Valid	Potential Archaeological Deposit (PAD)
45-6-3071	445-473 Wattle Street PAD	Valid	Potential Archaeological Deposit (PAD) 1
45-6-2987	Poultry Market 1	Valid	Artefact: 1
45-6-3064	445-473 WATTLE ST PAD	Valid	Potential Archaeological Deposit (PAD): 1
45-6-3152	168-190 Day Street, Sydney PAD	Not a Site	Potential Archaeological Deposit (PAD): -
45-6-3155	Moore Park AS1	Destroyed	Artefact: -
45-6-3217	Darling Central Midden	Valid	Aboriginal Ceremony and Dreaming: 1, Artefact: 1, Shell: 1
45-6-3245	Doncaster Ave PAD	Valid	Potential Archaeological Deposit (PAD): -
45-6-3246	RSY 1	Valid	Artefact:
45-6-3645	SFS-PAD	Valid	Potential Archaeological Deposit (PAD): 1
45-6-3654	CRS AS 01 (Central Railway Station Artefact scatter 01)	Valid	Artefact: -



Figure 6-1 AHIMS Search Results.
 Study site indicated by black arrow. OEH (2019) Memory Map (2012) Topographic Map 1:25000 South East.

6.5 OTHER SEARCH RESULTS

Results for other statutory databases searched are given below;

- The study area does not appear on the National Heritage List (DSEWPC, 2012);
- The study area does not appear on the Commonwealth Heritage List (DSEWPC 2012);
- The study area does not appear on the State Heritage Register (DSEWPC, 2012);
- The study area does not appear on the Register of Declared Aboriginal Places (DECCW, 2012).

6.6 SUMMARY OF ARCHAEOLOGICAL PREDICTIVE MODEL FOR THE REGION

Predictive modelling is an adaptive process which relies on a framework formulated by a number of factors, including but not limited to the use of local land systems, the environmental context, archaeological work and any distinctive sets of constraints that would influence land use patterns. This is based on the concept that different landscape zones may offer different constraints, which is then reflected in the spatial distributions and forms of archaeological evidence within the region (Hall and Lomax 1996).

Early settlement models focused on seasonal mobility, with the exploitation of inland resources being sought once local ones become less abundant. These principles were adopted by Foley (1981) who developed a site distribution model for forager settlement patterns. This model identifies two distinctive types of hunter and gather settlements; 'residential base camps' and 'activities areas.' Residential base camps are predominately found located in close proximity to a reliable source of permanent water and shelter. From this point the surrounding landscape is explored and local resources gathered. This is reflected in the archaeological record, with high density artefact scatters being associated with camp bases, while low density and isolated artefacts are related to the travelling routes and activity areas (Foley 1981).

However, more recently, investigation into understanding the impacts of various episodes of occupation on the archaeological record has been explored, of which single or repeated events are being identified. This is often a complex process to establish, specifically within predictive models as land use and disturbance can often result in post depositional processes and the superimposition of archaeological materials by repeated episodes of occupation.

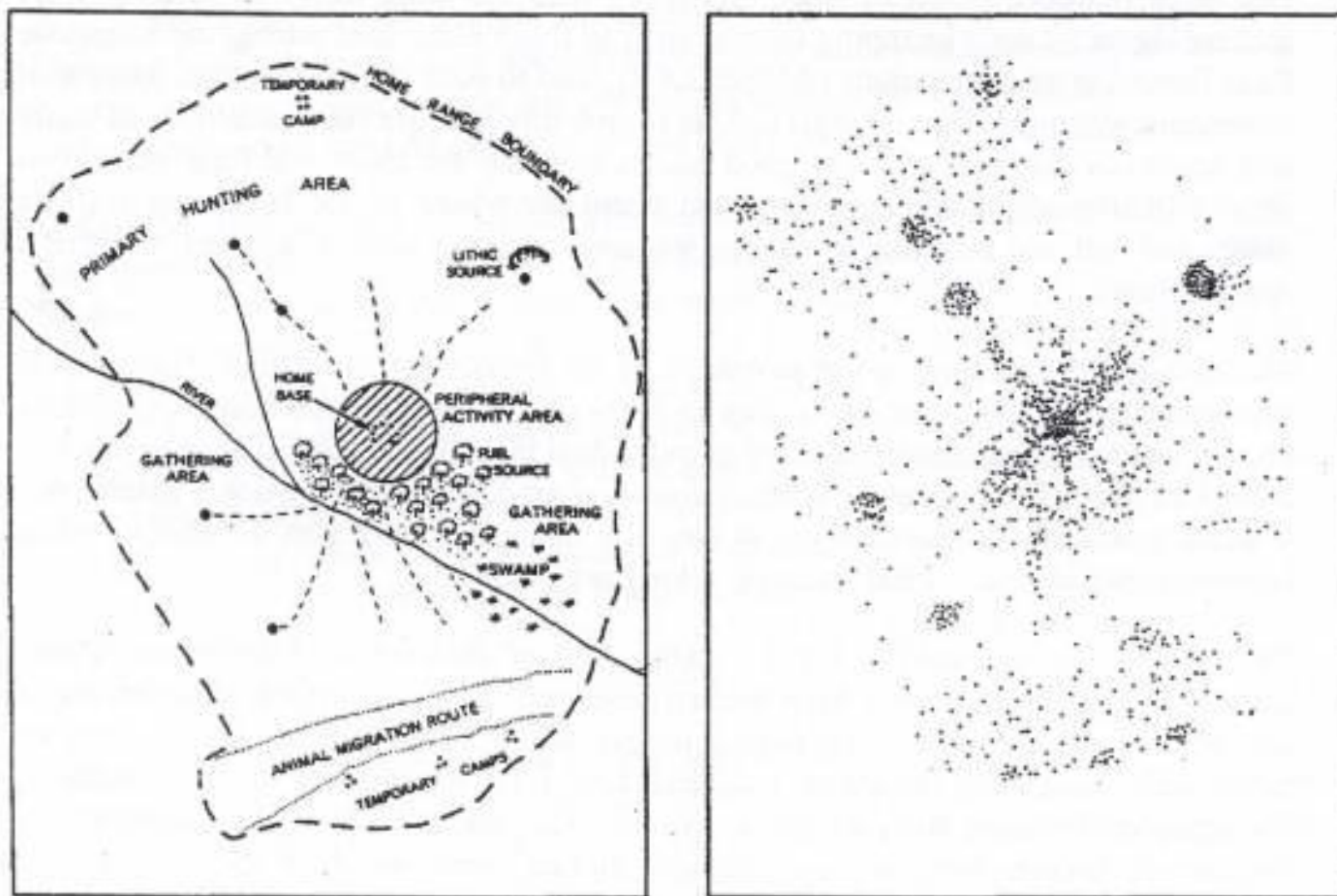


Figure 6-2 Examples of forager settlement patterns.
Foley (1981).

The principals behind this model have been incorporated into other predictive models such as that of McBryde (1976). McBryde's model is centred on the utilisation of food resources as a contributor to settlement patterns, specifically with reference to the predictability and reliability of food resources for Aboriginal people within the immediate coastal fringe and/or hinterland zone, with migratory behaviour being a possibility. Resources such as certain species of animals, particularly; small marsupials and reptiles, plant resources and nesting seabirds may have been exploited or only available on a seasonal or intermittent basis. As such, archaeological sites which represent these activities whilst not being representative of permanent occupation may be representative of brief, possibly repeated occupation.

Jo McDonald and Peter Mitchell have since contributed to this debate, with reference to Aboriginal archaeological sites and proximity to water using their Stream order model (1993). This model utilises Strahler's hierarchy of tributaries.

This model correlates with the concept of proximity to permanent water and site locations and their relationship with topographical units. They identify that artefact densities are greatest on terraces and lower slopes within 100m of water.

Intermittent streams however, also have an impact on the archaeological record. It was discovered that artefacts were most likely within 50 – 100m of higher (4th) order streams, within 50m (2nd) order streams and that artefact distributions around (1st) order streams was not significantly affected by distance from the watercourse. Landscapes associated with higher order streams (2nd) order streams were found to have higher artefact densities and more continuous distribution than lower order streams.

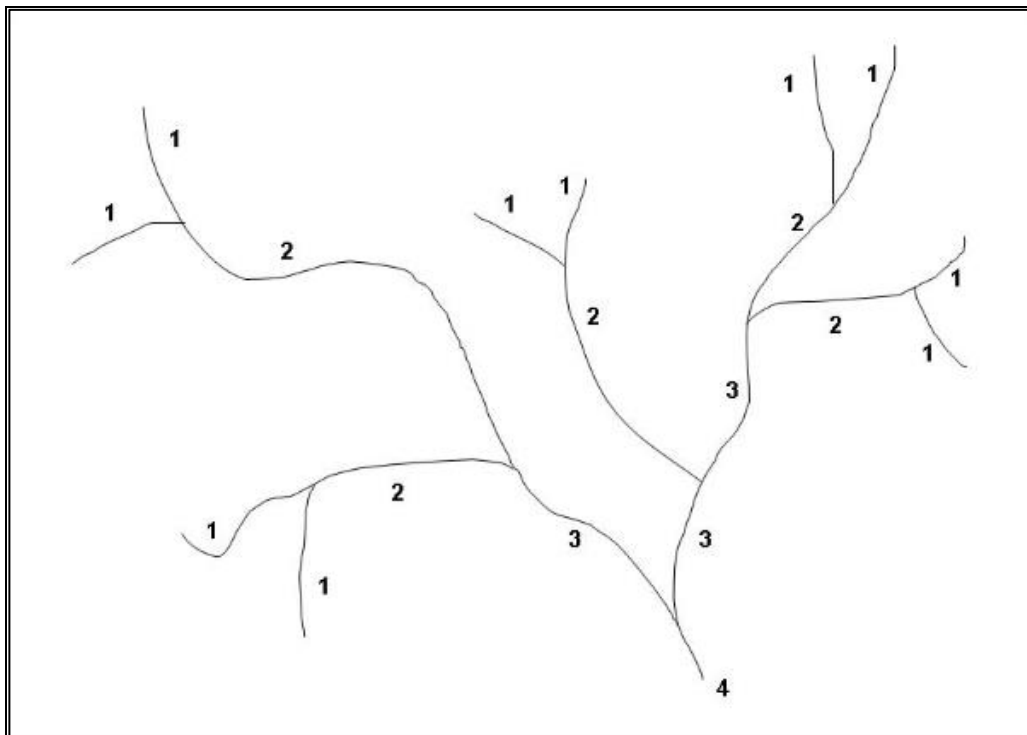


Figure 6-3 Strahler's hierarchy of tributaries.
Strahler (1957).

Table 6-2 Relationship between landscape unit and site distribution for region

Landscape Unit /Site types	Site Distribution and activity
1 st order stream	Archaeological evidence will be sparse and reflect little more than a background scatter
Middle reaches of 2 nd Order Stream	Archaeological evidence will be sparse but focus activity (one off camp locations, single episodes and knapping floor)
Upper reaches of 2 nd order stream	Archaeological evidence will have a relatively sparse distribution and density. These sites contain evidence of localised one-off behaviour.
Lower reaches of 3 rd order stream	Archaeological evidence for frequent occupation. This will include repeated occupation by small groups, knapping floors (used and unused material) and evidence of concentrated activities.
Major creeklines 4 th order streams	Archaeological evidence for more permanent or repeated occupation. Sites will be complex and may be stratified with a high distribution and density.
Creek junctions	This landscape may provide foci for site activity, the size of the confluence in terms of stream rankings could be expected to influence the size of the site, with the expectation of there being higher artefact distribution and density.
Ridge top locations between drainage lines	Ridge Tops will usually contain limited archaeological evidence, although isolated knapping floors or other forms of one-off occupation may be in evidence in such a location.
Raw Materials near watersources	The most common raw materials are silcrete and chert in sites closer to coastal headlands, though some indurated mudstone/silicified tuff and quartz artefacts may also be found.
Grinding Grooves	Grinding Grooves may be found in the sandstone or shale/sandstone transition areas.
Scarred trees -	May occur in stands of remnant vegetation.
Ceremonial Sites	Consultation with relevant Aboriginal Stakeholder groups, individuals and review of ethnographic sources often reveal the presence of ceremonial or social sites.

This predictive model has been refined with focus on the dominant environment and landscape zones of the Cumberland Lowlands, such as the Wianamatta Group Shales, Hawksbury Sandstone, Quaternary alluvium, Quaternary Aeolian and Tertiary alluvium. Attenbrow (2002) discovered that the Quaternary alluvial deposits had a greater concentration of archaeological sites, which is likely the result of these deposits being located towards major creeklines and rivers, such as Eastern Creek, Second Ponds Creek etc. Areas of alluvial deposits were found by Kohen (1986) to contain artefact scatters of a large and complex nature the closer they were to permanent creeks.

Umwelt (2004), have identified similar environmental – archaeological relationships which contribute to the mapping and modelling of archaeological sites, such as;

- The pattern of watercourses and other landscape features such as ridge lines affected the ease with which people could move through the landscape;
- Certain landscape features such as crests or gently sloping, well-drained landforms influenced the location of camping places or vantage points that provided outlooks across the countryside;
- The morphology of different watercourses affected the persistence of water in dry periods and the diversity of aquatic resources and so influenced where, and for how long, people could camp or procure food;
- The distribution of rock outcrops affected the availability of raw materials for flakes and ground stone tools;
- The association of alluvial, colluvial and stable landforms affects the potential that sites will survive;
- European land-use practices affect the potential for site survival and/or the capacity for sites to retain enough information for us to interpret the types of activities that took place at a specific location.

The Aboriginal Cultural Heritage Data Audit (DOP, 2005) produced the following table as part of the NSW Comprehensive Coastal Assessment Toolkit (DOP, 2005) which made the following statements outlined in table 5.3 about the predictive location of Aboriginal sites in Coastal NSW. These statements support the conclusions drawn in the following predictive model established for the study area. The study makes one very important claim which is that Aboriginal Ceremonial or Dreaming Sites can only be identified by Aboriginal community knowledge.

All models state that the primary requirement of all repeated, concentrated or permanent occupation is reliable access to fresh water. Brief and possibly repeated occupation may be represented in areas that have unreliable access to ephemeral water sources, however these areas will not possess a high archaeological potential (Goodwin 1999).

Table 6-3 Aboriginal Cultural Heritage Data Audit, Predictive Modelling for Coastal Aboriginal Sites, NSW.

Site Type	Archaeological/ Predictive Modelling
Aboriginal Ceremony and Dreaming Sites	Can only be identified on the basis of Aboriginal community knowledge.
Aboriginal Resource and Gathering Sites	Can occur at any location where plant and animal target species are found at present or were available in the past.
Art Sites:	All rock paintings or drawings and some rock engravings will occur within rock shelters/overhangs, most commonly within sandstone cliff lines and in granite boulder fields. Rock engravings may occur wherever there are suitable rock-surface exposures.
Artefacts:	Will occur in all landscapes with varying densities. Artefacts of greatest scientific significance will occur in stratified open contexts (such as alluvial terraces, sand bodies) and rock shelter floors.
Burials:	Most likely (but not always) to be buried in, or eroding from, sandy soils. Can occur within rock shelters/overhangs, most commonly within sandstone cliff lines and in granite boulder fields.
Ceremonial Ring Sites:	Environmental factors may be of particular importance in site location including association with sources of water, ridges, unstructured soils and geological boundaries. Distance to adjacent ceremonial ring sites may influence site location.
Conflict Sites:	Can only be identified on the basis of historical records and community knowledge.
Grinding Grooves:	Most likely to occur on surface exposures of sandstone. Occasionally occur within sandstone rock shelters.
Modified Trees	Will only occur where target tree species survive and if these are of an age generally greater than 100 years old.
Non-Human Bone and Organic Material Sites:	Will occur in any surface or buried context where preservation conditions allow. Most commonly survive in open shell midden sites and in rock shelter floor deposits.
Ochre Quarry Sites:	Can occur at any location where suitable ochre sources are found, either as isolated nodules or as suitable sediments (clays).
Potential Archaeological Deposits:	Can occur in all landscape types. PADs of greatest scientific significance will occur in stratified open contexts (such as alluvial terraces, sand bodies) and rock shelter floors.
Shell Middens:	Will occur as extensive packed shell deposits to small shell scatters in all coastal zones along beaches, headlands and estuaries, both in open situations and in rock shelters. May occur along rivers and creeks where edible shellfish populations exist or existed in the past.
Stone Arrangements	Tend to be on high ground, often on the tops of ridges and peaks commanding views of the surrounding country. Often situated in relatively inaccessible places.
Stone Quarry Sites:	Can occur at any location where suitable raw materials outcrop, including pebble beds/beaches.
Waterholes	May occur within any river or creek. Rare examples may occur in open exposures of rock.

6.6 ARCHAEOLOGICAL PREDICTIVE MODEL FOR THE STUDY AREA

The following section gives an indication of the likelihood of certain site types being located within the study area. These indications are based on the research and results of assessments and excavations in the vicinity of the study area.

Site Type	Research	Likelihood
Open Artefact Scatters	Higher order streams are located within the vicinity of the study area. The dearth of known reliable raw material source within nearby landscape units, would suggest that the artefacts may be significant in number but smaller in size, on account to greater levels of stone tool reduction. Excavations in the vicinity of the study area indicate the presence of deposits that are suggestive of concentrated and repeated occupation.	Likely within undisturbed parts of the study area.
Isolated Artefacts	Higher order streams are located within the vicinity of the study area. The dearth of known reliable raw material source within nearby landscape units, would suggest that the artefacts may be significant in number but smaller in size, on account to greater levels of stone tool reduction. Excavations in the vicinity of the study area indicate the presence of deposits that are suggestive of concentrated and repeated occupation.	Likely within undisturbed parts of the study area.
Grinding Grooves	Boulders of sandstone or outcrops do not occur in the landscape units represented in the study area.	Unlikely
Stone Resource Sites	Rock outcrops of suitable flaking material are almost absent from the soil landscapes represented within the study area.	Unlikely
Scarred Trees	Trees of sufficient age onsite were inspected. No scarring/modified was present.	Unlikely
Sandstone Shelters	The soil landscapes of the study area do not contain sandstone overhangs	Unlikely
Burials	Undisturbed sandy loam deposits do not lie within the study area and the soil landscapes in which the study area is located are generally acidic. Skeletal remains tend to decompose very quickly in acidic soil profiles.	Unlikely
Ceremonial Sites	Consultation with relevant Aboriginal parties and individuals is taking place, however it is possible that such information may become available in the future as a result of further consultation	Possible that Ceremonial/Social sites will be present within the study area

6.7 DISTURBANCE FACTORS

This section of the report provides an assessment of the level of disturbance and the likely archaeological potential of the study area. The archaeological potential is based on the level of previous disturbance as well as the previously discussed predictive models for the region.

The Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974, (DECCW 2010); defines disturbed lands as given below.

“Land is disturbed if it has been the subject of a human activity that has changed the land’s surface, these being changes that remain clear and observable. Examples include ploughing, construction of rural infrastructure (such as dams and fences), construction of roads, trails and tracks (including fire trails and tracks and walking tracks), clearing vegetation, construction of buildings and the erection of other structures, construction or installation of utilities and other similar services (such as above or below ground electrical infrastructure, water or sewerage pipelines, stormwater drainage and other similar infrastructure and construction of earthworks).”

This definition is based on the types of disturbance as classified in The Australian Soil and Land Survey Field Handbook (CSIRO 2010). The following is a scale formulated by CSIRO (2010) of the levels of disturbances and their classification.

Minor Disturbance		Moderate Disturbance		Major Disturbance	
0	No effective disturbance; natural	3	Extensive clearing (e.g. poisoning and ringbarking)	6	Cultivation; grain fed
1	No effective disturbance other than grazing by hoofed animals	4	Complete clearing; pasture native or improved, but never cultivated	7	Cultivation; irrigated, past or present
2	Limited clearing (e.g. selected logging)	5	Complete clearing; pasture native or improved, cultivated at some stage	8	Highly disturbed (quarrying, road works, mining, landfill, urban)

The above scale is used in determining the level of disturbance of the study area and its impact on the potential archaeology which may be present.

It is important to note that the following assessments describe the archaeological potential of the study area. It is acknowledged if the study area has little or no archaeological potential the study area may still have cultural significance to the Aboriginal community.

6.8 DISTURBANCE SUMMARY

Background research indicates that past European land use has led to the clearing of the land in order to establish a recreation area of which the area remains today, with various upgrades having taken place. The current building on the study site has a basement which would have impacted on any *intact* soils – the proposed development activity looks to repurpose the basement without extending. These historical disturbances impacted the local landscape during the establishment of the sporting facilities.

In light of this and in the context of the information provided about the land use of the site, its proximity to the Centennial Parklands as well as some of the property being located nearby former wetlands, this indicates that Aboriginal objects and/or deposits of archaeological and/or cultural heritage may be present within the deep profile of the area.

High disturbance to sections of the landscape: Sub-surface Aboriginal objects with potential conservation value have a **low** probability of being present within *intact* deposits located in the study area.



Figure 6-4 Disturbance map of study area.
Level of disturbance of the study site. Moderate disturbance indicated in orange. NSW LPI Six Maps (accessed 07/09/18).

7.0 SITE SURVEY

No formal survey took place as the site lies wholly within a highly disturbed area, e.g. the Centennial Parklands, built structures, playing fields and associated bus roads and shelters. In accordance with Section 2 of the Code, the approach and methodology chosen for the archaeological survey (in this instance, the absence of a survey) has utilised the information obtained from Requirements 1 to 4 of the Code instead. An archaeological survey was not expected to yield any information about the surface or subsurface deposits and therefore a survey sampling strategy was not developed.

8.0 SIGNIFICANCE ASSESSMENT

The processes of assessing significance for items of cultural heritage value are set out in *The Australian ICOMOS Charter for the Conservation of Places of Cultural Significance: the Burra Charter* (amended 1999) formulated in 1979 and based largely on the Venice Charter of International Heritage established in 1966. Archaeological sites may be significant according to four criteria, including scientific or archaeological significance, cultural significance to Aboriginal people, representative significance which is the degree to which a site is representative of archaeological and/or cultural type, and value as an educational resource. In New South Wales the nature of significance relates to the scientific, cultural, representative or educational criteria and sites are also assessed on whether they exhibit historic or cultural connections.

The criteria for assessing significance values are set out below;

- a) An item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area).
- b) An item has strong or special association with the life or works of a person, or groups of persons, of importance in the cultural or natural history of NSW (or the cultural or natural history of the local area).
- c) An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area).
- d) An item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons.
- e) natural history of the local area

8.1 ARCHAEOLOGICAL SIGNIFICANCE

8.1.1 Educational Significance

The educational value of any given location will depend on the importance of any archaeological material located, on its rarity, quality and the contribution this material can have on any educational process (Australia ICOMOS, 1999 p. 11).

No educational significance can be assigned to the study area as no Aboriginal archaeological features or objects have been located.

8.1.2 Scientific Significance

The scientific value of any given location will depend on the importance of the data that can be obtained from any archaeological material located, on its rarity, quality and on the degree to which this may contribute further substantial information to a scientific research process. (Australia ICOMOS, 1999 p.11).

No scientific significance can be assigned to the study area as no Aboriginal archaeological features or objects have been located.

8.1.3 Representative Significance

The representative value of any given location will depend on rarity and quality of any archaeological material located and on the degree to which this representativeness may

contribute further substantial information to an educational or scientific research process. (Australia ICOMOS, 1999 p.11).

No representative significance can be assigned to the study area as no Aboriginal archaeological features or objects have been located.

8.2 SOCIAL AND CULTURAL SIGNIFICANCE

As defined in the 'Burra Charter' (ICOMOS, 1999) cultural significance is broken into three parts: aesthetic, historic and scientific value for past, present or future generations. Cultural significance is a concept which assists in estimating the value of any given place. Places that are likely to be of significance are those which can contain information which may assist with the understanding of the past or enrich the present, and which will be of value to future generations. The meaning of these terms in the context of cultural significance is outlined below. It should be noted that they are not mutually exclusive, (Australia ICOMOS, 1999 p.12).

8.2.1 Historic Significance

A place may have historic value because it has influenced, or has been influenced by, an historic figure, event, phase or activity. It may also have historic value as the site of an important event. For any given place the significance will be greater where evidence of the association or event survives in situ, or where the settings are substantially intact, than where it has been changed or evidence does not survive. However, some events or associations may be so important that the place retains significance regardless of subsequent treatment. (Australia ICOMOS, 1999 p.11).

No specific historic significance has been assigned by registered Aboriginal parties.

8.2.2 Scientific Significance

The scientific value of any given location will depend on the importance of the data that can be obtained from any archaeological material located, on its rarity, quality and on the degree to which this may contribute further substantial information to a scientific research process. (Australia ICOMOS, 1999 p.11).

No specific scientific significance has been assigned by registered Aboriginal parties.

8.2.3 Aesthetic Significance

Aesthetic value includes aspects of sensory perception for which criteria can and should be stated. Such criteria may include consideration of the form, scale, colour, texture and material of the fabric; the smells and sounds associated with the place and its use. (Australia ICOMOS, 1999 p.11).

No specific historic significance has been assigned by registered Aboriginal parties.

8.3 STAKEHOLDER SUBMISSIONS

No Stakeholder submissions were received.

9.0 TEST EXCAVATION

The purpose of subsurface test excavation is to identify the nature and extent of any intact archaeological deposit and/ or objects which may be situated within the study area and its significance.

It aims to collate additional information regarding any site characteristics which may enhance our understanding of the local and/or regional prehistory of the area. The results of the test excavation aid in the formalisation of appropriate management recommendations and conservation goals for the proposed development and any archaeological material recovered.

The methodology and recommendations presented in the following section of the report take into account the following:

- Legislation which protects Aboriginal cultural and archaeological objects and places in New South Wales;
- Research and assessment carried out by the author/s of this report and previous reports;
- Results of previous archaeological assessment and excavation in the vicinity of the study area;
- The impact of the proposed development on any Aboriginal archaeological material that may be present;

9.1 TEST EXCAVATION UNDER THE CODE OF PRACTICE

As detailed in the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974 (DECCW 2010). The purpose for test excavation

“...is to collect information about the nature and extent of sub-surface Aboriginal objects, based on a sample derived from sub-surface investigations. Test excavations contribute to the understanding of site characteristics and local and regional prehistory and they can be used to inform conservation goals and harm mitigation measures for the proposed activity”

As the proposed test excavation is not being carried out in the following areas;

- in or within 50 m of an area where burial sites are known or are likely to exist
- in or within 50 m of a declared Aboriginal place
- in or within 50 m of a rock shelter, shell midden or earth mound
- in areas known or suspected to be Aboriginal missions or previous Aboriginal reserves or institutes
- in areas known or suspected to be conflict or contact sites.

It is therefore excluded from the definition of harm and as such will not require an Aboriginal Heritage Impact Permit and can be completed under the Code of Practice (DECCW 2010).

As set out in the Code of Conduct for the Investigation of Archaeological Objects in NSW:

“The test excavation should be sufficiently comprehensive to allow characterisation of the Aboriginal objects present without having a significant impact on the archaeological value of the subject area” (DECCW 2010)

Any test excavation carried out under this requirement must cease when:

- suspected human remains are encountered;
- enough information has been recovered to adequately characterise the objects present, with regard to their nature and significance.

The Code of Conduct for the Investigation of Archaeological Objects in NSW 'enough information' means that the sample of excavated material clearly and self-evidently demonstrates the deposit's nature and significance, and may include things like:

- locally or regionally high object density
- presence of rare or representative objects
- presence of archaeological features or locally or regionally significant deposits, stratified or not.

Decisions regarding the nature and significance of the site and choices about discontinuing the test excavation program shall be made by the excavation director in consultation with the registered Aboriginal stakeholders and OEH if required. Information will be reviewed on a daily basis and the excavation director reserves the right to cease all excavation if he/she believes the nature and extent of the site is understood in accordance with the Code of Conduct for the Investigation of Archaeological Objects in NSW.

9.2 TEST EXCAVATION METHODOLOGY

The following measures will be taken to establish the nature and extent of any such material discovered during test excavations under the Code of Practice (DECCW 2010)

The proposed development does have the potential to disturb any Aboriginal archaeological deposits and/or objects which are, or may be present. Therefore, in accordance with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974 (DECCW 2010), it is recommended a programme of test excavation be *conducted if any intact natural soil profiles are encountered* during the development and before it can proceed further.

The first priority in test excavations, and recording Aboriginal objects during test excavations, must always be to avoid or minimise, as far as practicable, the risk of harm to the objects under investigation. This means due care must be taken when excavating and collecting objects.

In compliance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, Part 6 National Parks and Wildlife Act 1974, (DECCW 2010) and if necessary, the following test excavation methodology will be conducted;

- Test excavation units will be placed on a systematic grid appropriate to the scale of the area – either PAD or site – being investigated e.g. 10 m intervals, 20 m intervals, or other justifiable and regular spacing.
- Any test excavation point will be separated by at least 5 m.
- Test excavations units will be excavated using hand tools only.
- Test excavations will be excavated in 50 cm x 50 cm units.
- Test excavations units may be combined and excavated as necessary to understand the site characteristics, however: the maximum continuous surface area of a combination of test excavation units at any single excavation point

conducted in accordance with point (above) will be no greater than 3 m². The maximum surface area of all test excavation units will be no greater than 0.5% of the area – either PAD or site – being investigated.

- The first excavation unit will be excavated and documented in 5 cm spits at each area – either PAD or site – being investigated. Based on the evidence of the first excavation unit, 10 cm spits or sediment profile/stratigraphic excavation (whichever is smaller) will then be implemented.
- Test excavation units will be excavated to at least the base of the identified Aboriginal object-bearing units, and will continue to confirm the soils below are culturally sterile.
- Photographic and scale-drawn records of the stratigraphy/soil profile, features and informative Aboriginal objects will be made for each single excavation point.
- Test excavations units will be backfilled as soon as practicable.
- Following test excavation, an Aboriginal Site Impact Recording form will be completed and submitted to the AHIMS Registrar as soon as practicable

9.2.1 Sieving

The excavated soil from each spit is to be placed in buckets of uniform size (9-10kg limit); these buckets will be counted and all material excavated from the test excavation units will be sieved using a 5 mm aperture wire-mesh sieve. All archaeological material that is recovered from sieving will be placed in a zip lock bag and labelled with the site number, date, trench and spit. All of the bags will then be placed in a larger zip lock bag for processing.

9.2.2 Recording

A photographic record will be kept of the progress of each test trench as well as photographic and scale-drawn records of the stratigraphy/soil profile and features will be made for each single excavation point.

Details pertaining to individual spits will be recorded through the completion of site forms. The details on the form include site name, pit number, location and landform, area, spit number, spit depth, soil horizon, artefacts, stratigraphic profile as well as additional notes relating to the soil deposits encountered.

Personal records are also to be noted in the director's field journal. Any artefacts recovered shall be recorded under the parameters set out in the Code of Conduct for the investigation of Archaeological objects in NSW and will be stored as outlined in the care and control agreement.

9.3 VISION STATEMENT AND PURPOSE OF POLICIES

The archaeological and cultural heritage significance of the study area carries with it implications for the development and management of the study site. The following vision statement captures the vision and aims of the conservation policies for the study area that arise from the development, its archaeological and cultural heritage significance, and relevant constraints and opportunities.

The following policies have been developed to retain as much as possible the identified archaeological and cultural heritage significance of the study area. The policies are sufficiently flexible in recognising both operational constraints and requirements, while

enabling as much as is possible of the archaeological and cultural significance of the study area to be retained.

The policies and guidelines should be read in conjunction with each other. The individual policies are structured under a series of major headings as follows:

- Archaeological and Cultural Policy
- Care and Control Agreement
- Nature of Significance of the Site

9.3.1 Archaeological and Cultural Policy

A background analysis of the archaeological context revealed that if excavations *encounter intact natural soil profiles* in the study area, these may have the potential to contain items or areas of low -moderate Aboriginal archaeological significance. In light of this, and in the context of the information provided about the proposed activity works, the following has been recommended to manage the archaeological values of the study area in accordance with Part 6 National Parks and Wildlife Act 1974, (DECCW 2010).

- Further investigation in the form of the an Aboriginal Cultural Heritage Management Plan be undertaken in accordance with the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in New South Wales, Part 6 National Parks and Wildlife Act 1974 (DECCW 2010); This process is in train and has reached Stage 4 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010).
- Consultation with the Registered Aboriginal Parties (RAPs) should continue, as per the requirements detailed in the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010).
- A systematic subsurface disburied test excavation programme should be carried out under the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, *if intact natural soil profiles are encountered*. This is to take place prior to the development activity proceeding (Section 4.0).
- In the event, archaeological test excavations reveal Aboriginal archaeological objects or deposits, the following is recommended. Once the nature and extent of the archaeological site has been established through test excavation, the data will be analysed and synthesised into a test excavation report.
- An analysis of artefacts retrieved should be conducted in a frame work to allow for comparison with previous relevant results.
- After this, and before any ground disturbance takes place as part of the construction, all development staff, contractors and workers should be briefed prior to works commencing on site, as to the status of the area and their responsibilities regarding any Indigenous archaeological deposits and/or objects that may be located during the following development through a Cultural Awareness Induction;

Should any human remains be located during the following development;

- All excavation in the immediate vicinity of any objects of deposits shall cease immediately;
- The NSW police and OEH's Enviroline be informed as soon as possible:
- Once it has been established that the human remains are Aboriginal ancestral remains, OEH and the relevant Registered Aboriginal Parties will identify the appropriate course of action.

9.3.2 Care and Control Agreement

If any archaeological material is recovered it shall be subject to a care and control agreement established after the nature and significance of the archaeological or cultural material is understood as per requirement 26 of the Code of Conduct for the investigation of Archaeological objects in NSW.

Any artefacts recovered shall be reburied as soon as practicable. They will be temporarily secured in a storage location in accordance with requirement 26 of the Code of Conduct for the investigation of Archaeological objects in NSW, pending any agreement reached as to the long-term management of the salvaged Aboriginal objects.

The excavation director is responsible for ensuring that procedures are put in place so that Aboriginal objects that are reburied are not harmed. The location of the secure temporary storage location must be submitted to AHIMS with a site update record card for the site(s) in question.

9.3.3 Nature and Significance of the Site

As set out in the Code of Conduct for the Investigation of Archaeological Objects in NSW:

“The test excavation should be sufficiently comprehensive to allow characterisation of the Aboriginal objects present without having a significant impact on the archaeological value of the subject area” (DECCW 2010)

Any test excavation carried out under this requirement must cease when:

- suspected human remains are encountered: or
- enough information has been recovered to adequately characterise the objects present with regard to their nature and significance.

The Code of Conduct for the Investigation of Archaeological Objects in NSW ‘enough information’ means that the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance, and may include things like:

- locally or regionally high object density
- presence of rare or representative objects
- presence of archaeological features or locally or regionally significant deposits, stratified or not.

Decisions regarding the nature and significance of the site and choices about discontinuing the test excavation program shall be made by the excavation director in consultation with the registered Aboriginal stakeholders and OEH if required.

Information will be reviewed on a daily basis and the excavation director reserves the right to cease all excavation if he/she believes the nature and extent of the site is understood in accordance with the Code of Conduct for the Investigation of Archaeological Objects in NSW.

9.4 TEST TRENCH LOCATIONS

Test trenches will be located with reference to known or suspected locations of Aboriginal archaeological deposits, the location of development excavation and areas of known disturbance.

The order of excavation will be established on site as logistics and site access will be factors taken into consideration and all landforms will be investigated.

The location of test pits will be decided on site. Figure 8.1 indicates the arbitrary locations of several trenches in the event testing would be conducted as would be required under the Code of Practice.



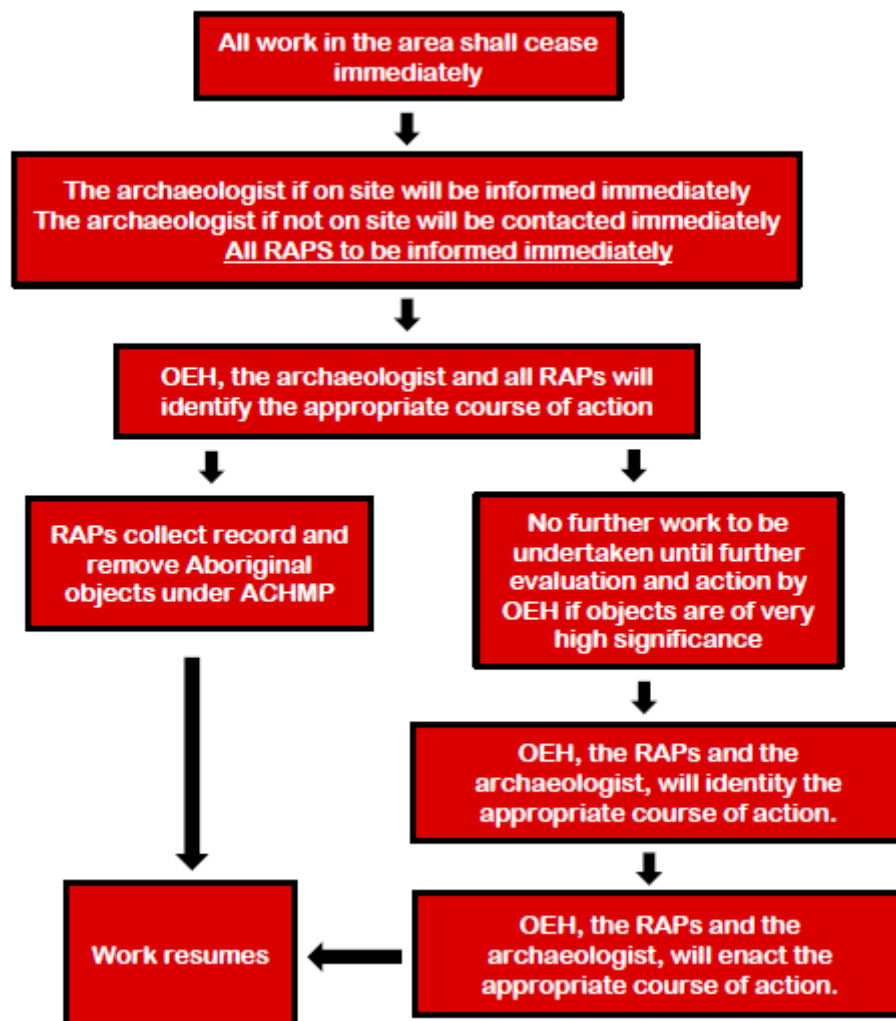
Figure 9-1

Proposed Floor Plan – Ground with Arbitrary Trench Locations indicated in red.
 Populous (02/11/2018), SK.02.0000 REV A. AMAC (2019).

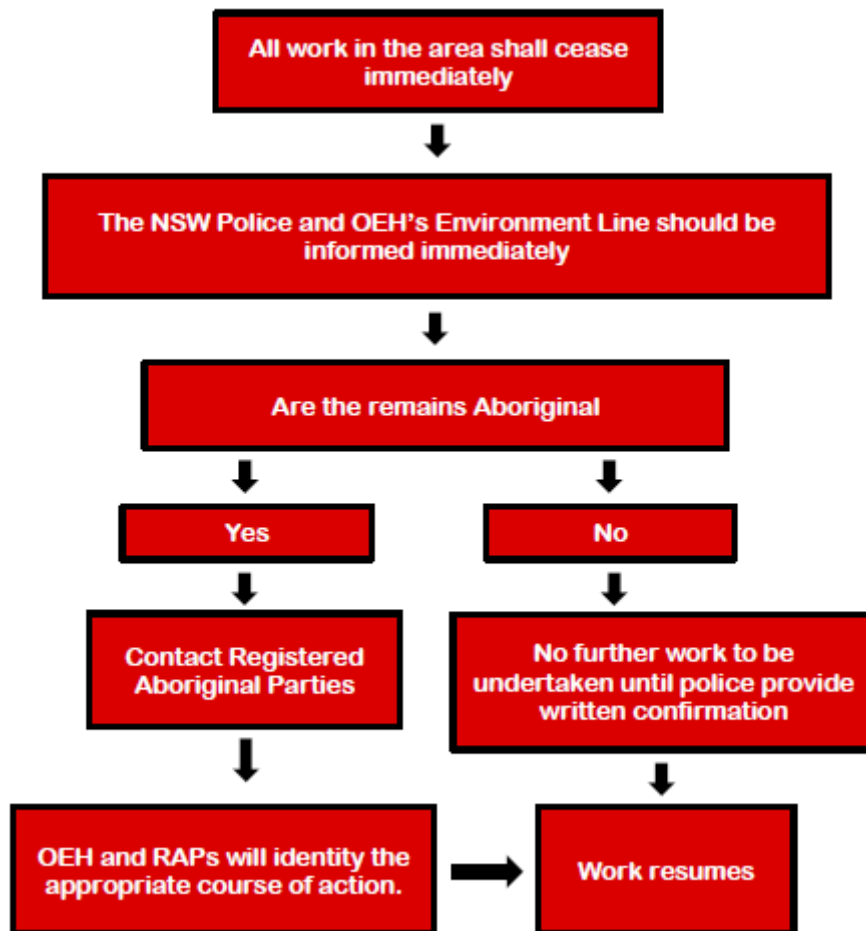
10.0 PLAN OF ACTION

The following are flow charts for the course of action for the listed potential archaeological constraints that all signatories to the ACHA, have read, understood and agreed to in the event of an ACHMP.

10.1 FLOW CHART FOR THE DISCOVERY OF UNEXPECTED ABORIGINAL ARCHAEOLOGICAL MATERIAL



10.2 FLOW CHART FOR THE PROCEDURE FOR THE DISCOVERY OF HUMAN REMAINS



10.3 CONTACT DETAILS

The contact details for the following archaeologist, NSW Police, OEH and Registered Aboriginal Parties are as follows:

Organisation	Contact	Contact Details
NSW Environment Line		131 555
NSW Sydney City Local Area Command		LAC Office: 192 Day Street Sydney NSW 2000 Ph: (02) 9265 6499 Fax: (02) 9265 6434
Archaeological Management & Consulting Group Pty Ltd	Mr. Benjamin Streat or Mr. Martin Carney	122c-d Percival Road Stanmore NSW 2048 Ph:(02) 9568 6093 Fax:(02) 9568 6093 Mob: 0405 455 869 Mob: 0411 727 395 benjaminstreat@archaeological.com.au
Office of Environment & Heritage NSW Department of Planning and Environment	Archaeologist – Head Office	PO Box A290 Sydney South NSW 1232 Ph: (02) 9995 5000 info@environment.nsw.gov.au
La Perouse Local Aboriginal Land Council (LPLALC)	Makayla Horwood	Po Box 365 Matraville NSW 2036 (02) 9311 4282 MHorwood@laperouse.org.au
Darug Land Observations	Anna O' Hara	daruglandobservations@gmail.com
Butucarbin Cultural Heritage Assessments	Lowanna Gibson	butuheritage@gmail.com
Goodradigbee Cultural & Heritage Aboriginal Corp.	Caine Carroll	Goodradigbee1@outlook.com
Wailwan Aboriginal Group	Phil Boney	Waarlan12@outlook.com
A1 Indigenous Services	Carolyn Hickey	cazadirect@live.com
Ginninderra Aboriginal Corp.	Lisa Green	ginninderra.corp@gmail.com

11.0 REPORTING

All ACHA works carried out during the Royal Hall of Industries Project will be documented to a standard comparable to that required by the Code of Practice for Archaeological Investigation of Aboriginal Objects DECCW 2010 and in consultation with Registered Aboriginal Parties.

12.0 REVIEW PROCEDURE

Once this ACHA has been agreed to by all parties and all parties the ACHA. The document is to be reviewed and endorsed by the DPE. No alteration of procedures shall take place without the involvement of all parties. All parties and their organisations shall be informed in writing of the proposed review and all parties and their respective organisations must agree to any changes and be a signatory to a review document where any changes shall be detailed.

REFERENCES

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2011 & 2012 www.environment.nsw.gov.au/awssapp
- ARCHAEOLOGICAL HERITAGE MANAGEMENT SOLUTIONS.
2011 *HIS & Preliminary Aboriginal and Historic Archaeological Assessment*, Sydney Heritage Fleet Base, Pyrmont, NSW.
- AMAC GROUP & STREAT ARCHAEOLOGICAL SERVICES.
2017 *Due Diligence Aboriginal Archaeological Assessment – Bank Street Commercial Wharf, 5-19 Bank Street, Pyrmont NSW*. Unpublished Report for Urban-Growth NSW.
- AMAC GROUP & STREAT ARCHAEOLOGICAL SERVICES.
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APPENDIX

APPENDIX 1 AHIMS SEARCH RESULTS



Office of
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AHIMS Web Services (AWS) Search Result

Purchase Order/Reference : HALL OF INDUSTRIES

Client Service ID : 397773

Streat Archaeological Services
PO Box 114
Enmore, New South Wales 2048
Attention: Benjamin Streat

Date: 09 February 2019

Email: streatarchaeological@netspace.net.au

Dear Sir or Madam:

AHIMS Web Service search for the following area at Lat. Long From : -33.9029, 151.2075 - Lat. Long To : -33.882, 151.2406 with a Buffer of 1000 meters, conducted by Benjamin Streat on 09 February 2019.

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:

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



Office of
Environment
& Heritage

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : HALL OF INDUSTRIES

Client Service ID : 397773

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
45-6-2597	Wynyard St Midden	AGD	56	333469	6247920	Open site	Valid	Shell : -, Artefact : -	Midden	102494,10276 3,102765
<u>Contact</u>		<u>Recorders</u>		Mr.D Coe		<u>Permits</u>				
45-6-0647	Centennial Park	AGD	56	336273	6247961	Open site	Valid	Art (Pigment or Engraved) : -	Rock Engraving	
<u>Contact</u>		<u>Recorders</u>		ASRSYS		<u>Permits</u>				
45-6-2580	Junction Lane	AGD	56	335070	6250410	Open site	Valid	Artefact : -	Open Camp Site	102494,10276 3,102765
<u>Contact</u>		<u>Recorders</u>		Helen Brayshaw		<u>Permits</u>		894,902,903		
45-6-0675	Randwick Queen's Park Waverley	AGD	56	338204	6247450	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
<u>Contact</u>		<u>Recorders</u>		Michael Guider		<u>Permits</u>				
45-6-0898	Woollahra;	AGD	56	337991	6249000	Open site	Valid	Art (Pigment or Engraved) : -	Rock Engraving	
<u>Contact</u>		<u>Recorders</u>		Unknown Author		<u>Permits</u>				
45-6-2637	George street 1	AGD	56	333860	6249880	Open site	Valid	Artefact : -		98238,102494, 102763,10276 5
<u>Contact</u>		<u>Recorders</u>		Dominic Steele Archaeological Consulting		<u>Permits</u>		1369		
45-6-2651	William St PAD	AGD	56	334800	6250220	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
<u>Contact</u>		<u>Recorders</u>		Mr.Neville Baker		<u>Permits</u>		1589,1670		
45-6-2652	Ultimo PAD 1	AGD	56	333450	6250000	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
<u>Contact</u>		<u>Recorders</u>		Jim Wheeler		<u>Permits</u>		1598		
45-6-2666	Wattle Street PAD 1	AGD	56	333150	6249450	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
<u>Contact</u>		<u>Recorders</u>		Dominic Steele Archaeological Consulting		<u>Permits</u>		1738		
45-6-2663	Mountain Street Ultimo	AGD	56	333300	6249400	Open site	Valid	Artefact : -, Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
<u>Contact</u>		<u>Recorders</u>		Mary Dallas Consulting Archaeologists		<u>Permits</u>		1719		
45-6-2680	Broadway Picture Theatre PAD 1	AGD	56	333150	6249000	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102142,10249 4,102763,1027 65
<u>Contact</u>		<u>Recorders</u>		Jim Wheeler		<u>Permits</u>		1854		

Report generated by AHIMS Web Service on 09/02/2019 for Benjamin Streat for the following area at Lat, Long From : -33.9029, 151.2075 - Lat, Long To : -33.882, 151.2406 with a Buffer of 1000 meters. Additional Info : CAREFULLY. Number of Aboriginal sites and Aboriginal objects found is 25

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : HALL OF INDUSTRIES

Client Service ID : 397773

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
45-6-2687	Crown Street PAD 1	AGD	56	334950	6250300	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	<u>Contact</u>	<u>Recorders</u>	Dominic Steele Archaeological Consulting							
45-6-2897	Queens Park PAD (duplicate see 45-6-2896)	AGD	56	338203	6247179	Closed site	Valid	Potential Archaeological Deposit (PAD) : 1	2017	
	<u>Contact</u>	<u>Recorders</u>	Mr.Paul Irish							
45-6-2896	Queens Park PADS	GDA	56	338203	6247179	Open site	Valid	Habitation Structure : 1, Potential Archaeological Deposit (PAD) : 1		
	<u>Contact</u>	<u>Recorders</u>	Dominic Steele Archaeological Consulting							
45-6-2979	UTS PAD 1 14-28 Ultimo Rd Syd	GDA	56	333650	6249590	Open site	Valid	Potential Archaeological Deposit (PAD) : -		102494,10276 3,102765
	<u>Contact</u>	<u>Recorders</u>	Dominic Steele Archaeological Consulting, Mr.Dominic Steele							
45-6-3071	445-473 Wattle Street PAD	GDA	56	333285	6249412	Open site	Valid	Potential Archaeological Deposit (PAD) : 1	3458	
	<u>Contact</u>	<u>Recorders</u>	Biosis Pty Ltd - Sydney							
45-6-2987	Poultry Market 1	GDA	56	333746	6249575	Open site	Valid	Artefact : 1		102494,10276 3
	<u>Contact</u>	<u>Recorders</u>	Ms.Samantha Higgs,Biosis Pty Ltd - Canberra							
45-6-3064	445-473 WATTLE ST PAD	GDA	56	333285	6249412	Open site	Valid	Potential Archaeological Deposit (PAD) : 1	3506	102763
	<u>Contact</u>	<u>Recorders</u>	Biosis Pty Ltd - Sydney							
45-6-3152	168-190 Day Street, Sydney PAD	GDA	56	333877	6250257	Open site	Not a Site	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Josh Symons,Mr.Alex Timms							
45-6-3155	Moore Park AS1	GDA	56	335613	6247909	Open site	Destroyed	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	Artefact - Cultural Heritage Management ,Mr.Josh Symons,Mr.Alex Timms							
45-6-3217	Darling Central Midden	GDA	56	333530	6250101	Open site	Valid	Aboriginal Ceremony and Dreaming : 1, Artefact : 1, Shell : 1	4019	
	<u>Contact</u>	<u>Recorders</u>	Comber Consultants Pty Limited,Ms.Tory Stening							

Report generated by AHIMS Web Service on 09/02/2019 for Benjamin Streat for the following area at Lat, Long From : -33.9029, 151.2075 - Lat, Long To : -33.882, 151.2406 with a Buffer of 1000 meters. Additional Info : CAREFULLY. Number of Aboriginal sites and Aboriginal objects found is 25

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : HALL OF INDUSTRIES

Client Service ID : 397773

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
45-6-3245	Doncaster Ave PAD	GDA	56	336037	6246916	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact									
		Recorders		GML Heritage Pty Ltd + Context - Surry Hills, Doctor Tim Owen				Permits	4188	
45-6-3246	RSY 1	GDA	56	336060	6246862	Open site	Valid	Artefact : -		
	Contact									
		Recorders		GML Heritage Pty Ltd + Context - Surry Hills, GML Heritage Pty Ltd + Context - Surry Hills				Permits	4188	
45-6-3645	SPS-PAD	GDA	56	335846	6248721	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		
	Contact									
		Recorders		Miss Sam Cooling, Curio Projects Pty Ltd				Permits		
45-6-3654	CRS AS 01 (Central Railway Station Artefact scatter 01)	GDA	56	334055	6249146	Open site	Valid	Artefact : -		
	Contact									
		Recorders		Artefact - Cultural Heritage Management, Miss Jennifer Norfolk				Permits		

Report generated by AHIMS Web Service on 09/02/2019 for Benjamin Streat for the following area at Lat, Long From : -33.9029, 151.2075 - Lat, Long To : -33.882, 151.2406 with a Buffer of 1000 meters. Additional Info : CAREFULLY. Number of Aboriginal sites and Aboriginal objects found is 25

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APPENDIX 2 SECRETARY'S ENVIRONMENTAL ASSESSMENT REQUIREMENTS - SSD 9627

Secretary's Environmental Assessment Requirements

Section 4.12(8) of the *Environmental Planning and Assessment Act 1979*
Schedule 2 of the *Environmental Planning and Assessment Regulation 2000*

Application Number	SSD 9627
Proposal Name	Adaptive reuse of the Royal Hall of Industries
Location	Royal Hall of Industries, 1 Driver Avenue, Moore Park (Lot 3, DP861843 and Lot 52, DP1041134)
Applicant	Sydney Swans Limited
Date of Issue	
General Requirements	<p>The Environmental Impact Statement (EIS) must meet the minimum form and content requirements in clauses 6 and 7 of Schedule 2 of the <i>Environmental Planning and Assessment Regulation 2000</i>.</p> <p>Notwithstanding the key issues specified below, the EIS must include an environmental risk assessment to identify the potential environmental impacts associated with the development.</p> <p>Where relevant, the assessment of the key issues below, and any other significant issues identified in the risk assessment, must include:</p> <ul style="list-style-type: none"> • adequate baseline data • consideration of potential cumulative impacts due to other development in the vicinity • measures to avoid, minimise and if necessary, offset the predicted impacts, including detailed contingency plans for managing any significant risks to the environment; and • justification of impacts. <p>The EIS must be accompanied by a report from a qualified quantity surveyor providing:</p> <ul style="list-style-type: none"> • a detailed calculation of the capital investment value (CIV) (as defined in clause 3 of the <i>Environmental Planning and Assessment Regulation 2000</i>) of the proposal, including details of all assumptions and components from which the CIV calculation is derived • an estimate of the jobs that will be created by the future development during the construction and operational phases of the development • certification that the information provided is accurate at the date of preparation.
Key issues	<p>The EIS must address the following specific matters:</p> <p>1. Statutory and Strategic Context The EIS shall address the relevant statutory provisions applying to the site contained in all relevant Environmental Planning Instruments (EPI's), including:</p> <ul style="list-style-type: none"> • State Environmental Planning Policy (State and Regional Development) 2011 • State Environmental Planning Policy 47 (Moore Park Showground) • State Environmental Planning Policy (Infrastructure) 2007 • Draft Environment Planning Policy (Environment) 2017) SEPP. <p><i>Permissibility</i> Detail the nature and extent of any prohibitions that apply to the development.</p>

	<p><i>Development Standards</i> Identify compliance with the development standards applying to the site and justification for any variations proposed.</p> <p>The EIS shall address the relevant planning provisions, goals and strategic planning objectives in the following:</p> <ul style="list-style-type: none"> • The Greater Sydney Region Plan 2018 • Central City District Plan 2018 • Future Transport Strategy 2056 and supporting plans • NSW State Infrastructure Strategy 2018-2038 • NSW Planning Guidelines for Walking and Cycling • Moore Park Masterplan 2040 • Heritage Conservation Strategy for Moore Park Showground 1995 • Centennial Parklands Plan of Management 2018 and Beyond • Development near Rail Corridors and Busy Roads – Interim Guideline 2008 • Interim Construction Noise Guideline 2009 • Crime Prevention Through Environmental Design Principles • Guide to Traffic Generating Developments (Roads and Maritime Services) • Guide to Traffic Management – Part 12: Traffic Impacts of Development (AUSTROADS) • NSW and ACT Government Regional Climate Modelling (NARCLIM) • OEH (2015) Urban Green Cover in NSW Technical Guidelines • City of Sydney Interim Floodplain Management Policy • City of Sydney Streets Technical Specifications A4: Stormwater Drainage • City of Sydney Public Domain Manual • Waste Not Development Control Plan (DCP) Guideline (EPA 2008) <p>2. Land Use The EIS shall:</p> <ul style="list-style-type: none"> • demonstrate how the proposed land use is consistent with the relevant statutory provisions and strategic objectives for the site • provide a detailed assessment of any impacts of the proposed adaptive reuse of the existing building and surrounding area, including justification for loss of the existing use. <p>3. Heritage The EIS shall:</p> <ul style="list-style-type: none"> • include a comprehensive heritage impact assessment (HIA), prepared by a suitably qualified heritage consultant in accordance with the NSW Heritage Manual and Burra Charter. The HIA must provide an assessment of the potential direct and indirect impacts of the proposal on State and local heritage items including: built heritage, landscapes (including setting and views) and historic archaeology. The HIA must address the heritage impacts of all aspects of the works including: <ul style="list-style-type: none"> ○ alterations and additions ○ services, access and signage ○ the adaptive reuse, fit out and operation, and reconfiguration of internal space ○ measures to mitigate any impacts, heritage interpretation and reasons where a more sympathetic solution is not selected • include a historic archaeological assessment prepared by a suitably qualified historical archaeologist in accordance with the <i>Archaeological Assessments Guidelines</i> (1996) and <i>Assessing Significance for Historical Archaeological Sites and 'Relics'</i> (2009). The assessment should identify
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	<p>what relics, if any, are likely to be present, assess their historic significance and consider the impacts from the proposal on this potential heritage resource. Any mitigation measures should avoid or ameliorate the impact with specific emphasis on <i>in situ</i> conservation and interpretation where State significant or substantially intact relics are identified. If harm cannot be avoided, an appropriate Research Design and Excavation Methodology must also be prepared to guide any proposed excavations.</p> <ul style="list-style-type: none"> include an Aboriginal Cultural Heritage Assessment Report (ACHAR) identifying any cultural heritage values, impacts, mitigation measures and interpretation opportunities including consultation with relevant Aboriginal people. <p>4. Design Excellence The EIS shall include a strategy to achieve Design Excellence, prepared in consultation with GA NSW.</p> <p>5. Built Form and Urban Design The EIS shall:</p> <ul style="list-style-type: none"> address the height, bulk and scale of the proposed development within the context of the locality, with specific consideration to the overall site layout, open spaces, interface with the public domain, facades, massing, setbacks, building articulation, solar access and overshadowing, materials, colours, signage or signage envelopes detail how services, including but not limited to, waste management, loading zones, and mechanical plant are integrated into the design of the development to minimise impacts on heritage items and the public domain. <p>6. Public Domain and Landscaping The EIS shall:</p> <ul style="list-style-type: none"> demonstrate how public domain areas and landscaping are configured to provide safe and active street frontages and provide visual interest to the public domain address impacts on existing trees, both on site and within surrounding streets identify any native trees or shrubs to be removed, retained or transplanted include details on the native vegetation community (or communities) that occur, or once occurred on site, with a list of local provenance species (trees, shrubs and ground covers) to be used for landscaping specify that any landscaping will use a diversity of local provenance species (trees, shrubs and ground covers) from the native vegetation community (or communities) that occur, or once occurred, on the site to improve biodiversity. <p>7. Environmental Amenity The EIS shall address how the proposal achieves a high level of environmental amenity, both internally and on the surrounding area, including solar access, overshadowing impacts, acoustic impacts, visual privacy, view loss, outlook, air quality and reflectivity.</p> <p>8. Ecologically Sustainable Development (ESD) The EIS shall:</p> <ul style="list-style-type: none"> detail how ESD principles (as defined in clause 7(4) of Schedule 2 of the Environmental Planning and Assessment Regulation 2000) will be incorporated in the design, construction and ongoing operation phases of the development demonstrate how the proposed development responds to best practice, sustainable building principles and improves environmental performance through energy efficient design, technology and renewable energy
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	<ul style="list-style-type: none"> • include a description of the measures that would be implemented to minimise consumption of resources, water and energy. • demonstrate how the climate change projections of the NSW Government's Regional Climate Modelling (NARClIM) are used to inform the building design, adaptive reuse and asset life of the project. <p>9. Transport and Accessibility (Operation) The EIS shall include a Traffic and Transport Impact Assessment that includes, but is not limited to the following:</p> <ul style="list-style-type: none"> • details of the current daily and peak hour vehicle, public transport, special event buses, pedestrian and bicycle movements and existing traffic and transport facilities provided on the road network and located adjacent to the proposed development on a typical weekday and weekend (event day) and consideration of simultaneous events within the Moore Park Precinct • traffic modelling and analysis of the future daily and peak hour vehicle (including point to point transport), public transport, coaches, special event buses, pedestrian and bicycle movements likely to be generated by the proposed development and assessment of the impacts on the local road network on a typical weekday and weekend (event day) and consideration of simultaneous events within the Moore Park Precinct, including key intersection capacity and any potential need for upgrading or road works (if required) • assessment of the operation of existing and future transport networks including the light rail and bus networks and their ability to accommodate the forecast number of trips to and from the development on a typical weekday and weekend (event day) and consideration of simultaneous events within the Moore Park Precinct • details of the proposed pick up and drop off facilities to accommodate the development's point to point transport and coach demand and measures to mitigate adverse traffic impacts on a typical weekday and weekend (event day) and consideration of simultaneous events within the Moore Park Precinct • assessment of the cumulative impacts of traffic volumes from the proposal together with existing and approved developments in the area, and proposed measures to mitigate any associated impacts on public transport, pedestrian, cycle and traffic networks • measures to promote sustainable travel choices for employees and visitors, that support the achievement of State Plan targets, such as implementing a location-specific travel plan and provision of end of trip facilities • details of the proposed access, appropriate provision, design and location of on-site bicycle parking including compliance with the relevant parking codes and Australian Standards, and details of how bicycle parking provision will be integrated into the existing network • service vehicle access, delivery and loading arrangements and estimated service vehicle movements (including vehicle type, routes and the likely arrival and departure times) • a road safety assessment of any proposed signage, lighting displays and reflectivity on roads. <p>10. Construction The EIS shall include a Construction Pedestrian and Traffic Management Plan addressing:</p> <ul style="list-style-type: none"> • details of peak hour and daily construction and servicing vehicle movements and access arrangements and cumulative impact from surrounding development sites, including the Sydney Light Rail project, on the local road network, public transport services and parking • road safety at key intersections and locations subject to heavy vehicle movements and high pedestrian activity
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	<ul style="list-style-type: none"> • details of access arrangements for workers to/from the site, emergency vehicles and service vehicle movements, including measures to reduce construction worker private vehicle trips • details of temporary cycling and pedestrian access during construction • details of proposed construction vehicle access arrangements at all stages of construction • assessment of traffic and transport impacts during construction and how these impacts will be mitigated for any associated traffic, pedestrians, cyclists and public transport operations within the Moore Park Precinct, including during adjacent events • potential impacts of the construction on surrounding areas and the public realm with respect to noise and vibration, air quality and odour impacts, dust and particle emissions, water quality, storm water runoff, groundwater seepage, soil pollution and construction waste • annual volume of materials to be extracted, processed or stored onsite during construction and how the extracted material will be disposed of or reused. • details of any crane locations and road closures • details of a consultation strategy for liaison with surrounding stakeholders. <p>10. Biodiversity The EIS shall provide an assessment of the proposal's biodiversity impacts in accordance with the Biodiversity Conservation Act 2016, including the preparation of a Biodiversity Development Assessment Report where required under the Act.</p> <p>11. Flooding and stormwater The EIS shall:</p> <ul style="list-style-type: none"> • include a stormwater management strategy which considers the relevant Council stormwater management policy and Water Sensitive Urban Design Principles. • assess any flood risk on site and consider any relevant provisions of the NSW Floodplain Development Manual (2005), including the potential effects of climate change, sea level rise and increase in rainfall intensity. <p>12. Soil, contamination and water The EIS shall:</p> <ul style="list-style-type: none"> • map acid sulphate soils, rivers, streams, wetlands, estuaries, groundwater, groundwater dependent ecosystems and proposed intake and discharge locations • identify if the proposal involves any discharges to waters or any dewatering requirements from the site, including during construction, and any associated impacts on water quality, including an assessment against relevant guidelines and the Water Quality Objectives (as endorsed by the NSW Government), licensing requirements under the <i>Water Act 1912</i> and <i>Protection of the Environment Operations Act 1997</i> • assess the impact on hydrology and include an integrated water management strategy that considers water, wastewater and stormwater. The strategy must include alternative water supply, proposed end uses of potable and non-potable water, outline opportunities for the use of integrated water cycle management practices and principles and demonstrate water sensitive urban design (WSUD) and any water conservation measures. • identify an adequate and secure water supply for the life of the project including confirmation that water can be sourced from an appropriately authorised and reliable supply and assessment of current market depth where water entitlement is required to be purchased • a detailed and consolidated water site balance
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	<ul style="list-style-type: none"> proposed surface and groundwater monitoring activities and methodologies. <p>13. Noise and Vibration The EIS shall include a noise and vibration assessment prepared in accordance with the relevant EPA guidelines. This assessment must detail construction and operational noise impacts on nearby noise sensitive receivers and outline proposed noise mitigation and monitoring procedures.</p> <p>14. Servicing and Waste The EIS shall:</p> <ul style="list-style-type: none"> identify, quantify and classify the likely waste streams to be generated during construction and operation of the development and describe the measures to be implemented to minimise, manage, reuse, recycle and safely dispose of this waste with reference to relevant guidelines identify appropriate servicing arrangements (including but not limited to, waste management, loading zones and mechanical plant) for the site. <p>15. Utilities The EIS shall:</p> <ul style="list-style-type: none"> address the existing capacity and future requirements of the development for the provision of utilities, including staging of infrastructure in consultation with relevant agencies detail impacts to any existing infrastructure assets of utility stakeholders from demolition/construction and any proposed mitigation/protection measures. <p>16. Staging The EIS shall provide details regarding the staging of the proposed development (if proposed).</p> <p>17. Public Benefit and Contributions The EIS shall provide confirmation of the public benefit to be derived from the proposal including any Contributions Plan and/or details of any Voluntary Planning Agreement.</p>
Plans and Documents	<p>The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Schedule 1 of the Environmental Planning and Assessment Regulation 2000. Provide these as part of the EIS rather than as separate documents.</p> <p>In addition, the EIS must include the following:</p> <ul style="list-style-type: none"> site survey plan, showing existing levels, location and height of existing and adjacent structures/buildings site analysis plan architectural drawings (at a useable scale at A3) heritage impact assessment historical archaeological assessment Aboriginal cultural heritage report schedule of materials and finishes public domain and landscape plan air quality assessment noise impact assessment and management plan access impact statement arboriculture report ESD report Building Code of Australia report consultation summary report

	<ul style="list-style-type: none"> • traffic and transport impact assessment • preliminary construction management plan, inclusive of a Construction Traffic Management Plan • sustainable travel plan • geotechnical and structural report • contamination assessment, including remedial action plan and site audit statement (if required) • integrated water management plan • servicing and operational waste management plan • stormwater management plan.
Consultation	<p>During the preparation of the EIS, you must consult with the relevant local, State or Commonwealth Government authorities, service providers and community groups. In particular you must consult with:</p> <ul style="list-style-type: none"> • Office of Environment and Heritage • City of Sydney City Council • Transport for NSW (including Sydney coordination Office and Transport Management Centre) • Roads and Maritime Services • Government Architect of NSW • ALTRAC – Sydney Light Rail Operator • Local Aboriginal Community and cultural groups • Centennial Park and Moore Park Trust • Surrounding residents, businesses and local community groups. <p>The EIS must include a report describing pre-submission consultation undertaken, including a record of the stakeholders consulted, the issues raised during the consultation and how the proposal responds to those issues. Where amendments have not been made to address an issue, a short explanation should be provided.</p>
Further consultation after 2 years	<p>If you do not lodge a development application and EIS for the development within 2 years of the issue date of these SEARs, you must consult further with the Secretary in relation to the preparation of the EIS.</p>