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Our Ref: KA-178

SINSW
c/o: JohnStaff
Priya Mekala
Level 5, 9 Castlereagh Street
Sydney NSW 2000

2nd February 2023

Dear Ms Mekala,

**RE: Proposed Ancillary Works at Narrabeen North Public School Within A Coastal Wetlands Area -
Aboriginal Heritage Assessment for Designated Development**

The following letter report outlines the Aboriginal Cultural Heritage Assessment Report (ACHAR) that was prepared to support the Designated Development (DD) application to Northern Beaches Council for the proposed ancillary works within a mapped Coastal Wetlands Area at Narrabeen North Public School.

Please note that this assessment was informed by the outcomes of the ACHAR for proposed works within NEP that are the subject of Development Application (DA), as documented in the following report:

- Kayandel (2022). Narrabeen Education Precinct Redevelopment, 6 & 10 Namona Street (Lot 3 DP1018621 and Lot 12 DP1119562), North Narrabeen, Northern Beaches Council LGA, NSW: Aboriginal Cultural Heritage Assessment Report.

1. Introduction

1.1. Development Proposal

Narrabeen North Public School forms part of the Narrabeen Education Precinct.

The DD seeks consent for the following works at NNPS.

- Removal of eight (8) trees;
- New accessible pedestrian pathways;
- New substation on Namona Street frontage along with associated conduit connections;
- New fire hydrant booster and associated conduit connections;
- New hard and soft landscaping including planting of 12 new trees.

The location of proposed DD works within the NNPS are shown in Figure 1.

Other development works are occurring on the site under separate planning pathways including:

- Development Application (DA);
- Development without consent (REF);
- Exempt development.

Overall, the proposed NEP development does not seek to increase staff or student numbers.



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1.2. Location of the Subject Area

The Subject Area is located within Northern Beaches Council (WSC) Local Government Area (LGA) and is located on the western side of the Pittwater Road.

The Subject Area comprises the Narrabeen North Public School campus of the NEP. The property comprises 6 Namona Street (Lot 3 DP1018621), North Narrabeen, and has a total area of 9.84ha (refer to Figure 2).



Figure 1: NNPS Masterplan (Source: Landscape Schematic Design Package dated 28 November 2022; provided to Douglas Partner by Johnstaff on 18 January 2023)



Figure 2: Subject Area

2. Previous Aboriginal Heritage Investigations of the Subject Area

In 2019, Kayandel was commissioned by Johnstaff (Project Manager) on behalf of Schools Infrastructure NSW (SINSW) to prepare an Aboriginal Cultural Heritage Report (ACHAR) in relation to Aboriginal heritage within 6 & 10 Namona Street, North Narrabeen:

- Kayandel (2022). Narrabeen Education Precinct Redevelopment, 6 & 10 Namona Street (Lot 3 DP1018621 and Lot 12 DP1119562), North Narrabeen, Northern Beaches Council LGA, NSW: Aboriginal Cultural Heritage Assessment Report.

The report was prepared in accordance with the following Heritage NSW (formerly the Department of Planning, Industry and Environment (DPIE)) guidelines:

- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, 2010a);
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011); and,
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW, 2010b).

The information presented below is limited to the Narrabeen North Public School (refer to Figure 2).

At the time of preparing the ACHAR, SINSW had not been issued Secretary's Environmental Assessment Requirements (SEARs) for the proposed redevelopment.

For full details of the consultation process that was undertaken with the Aboriginal community refer to Section 3 of Kayandel (2022, pp. 13-17).

The *Soil Landscapes of the Sydney 1:100,000 Sheet* identified the Subject Area lies is situated on Disturbed Terrain (xx) (Chapman, Murphy, Tille, Atkinson, & Morse, 2009) (refer to Figure 3).

The Disturbed terrain soil landscape is characterised by level plain to hummocky terrain, extensively disturbed by human activity, but not limited to complete disturbance, removal, or burial of soil, with areas of disturbed ground has been levelled to slopes of <3%. In terraced cut and fill areas short rises may be steeper than 30%. Turfed fill areas commonly capped with up to 40cm of sandy loam, or up to 60cm of compacted clay over fill or waste materials (Chapman et al., 2009, pp. 149-153). Chapman et al. (2009, p. 149) noted that in the disturbed terrain soil landscape of North Narrabeen some freshwater swamps have been filled in.

On the 18th September 2019, a search of the Aboriginal Heritage Information Management System (AHIMS) was conducted (refer to Section 6.2 of Kayandel (2022)). At the time of preparing the ACHAR, no Aboriginal sites had been recorded in the Subject Area (see Figure 4).

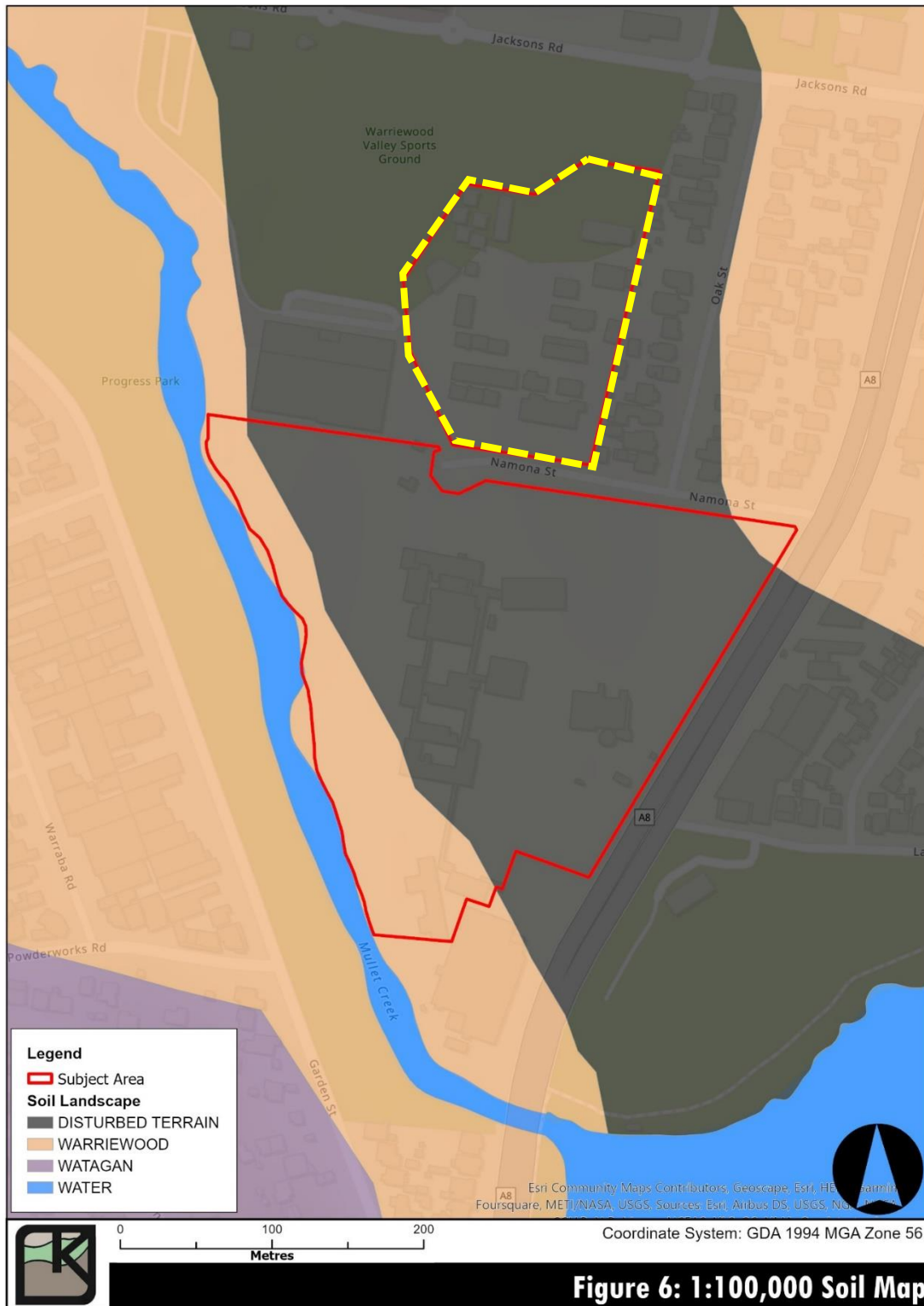


Figure 3: 1:100,000 Soil Map (source: Kayandel (2022, p. 29)). The Subject Area being considered in this advice is outlined in yellow

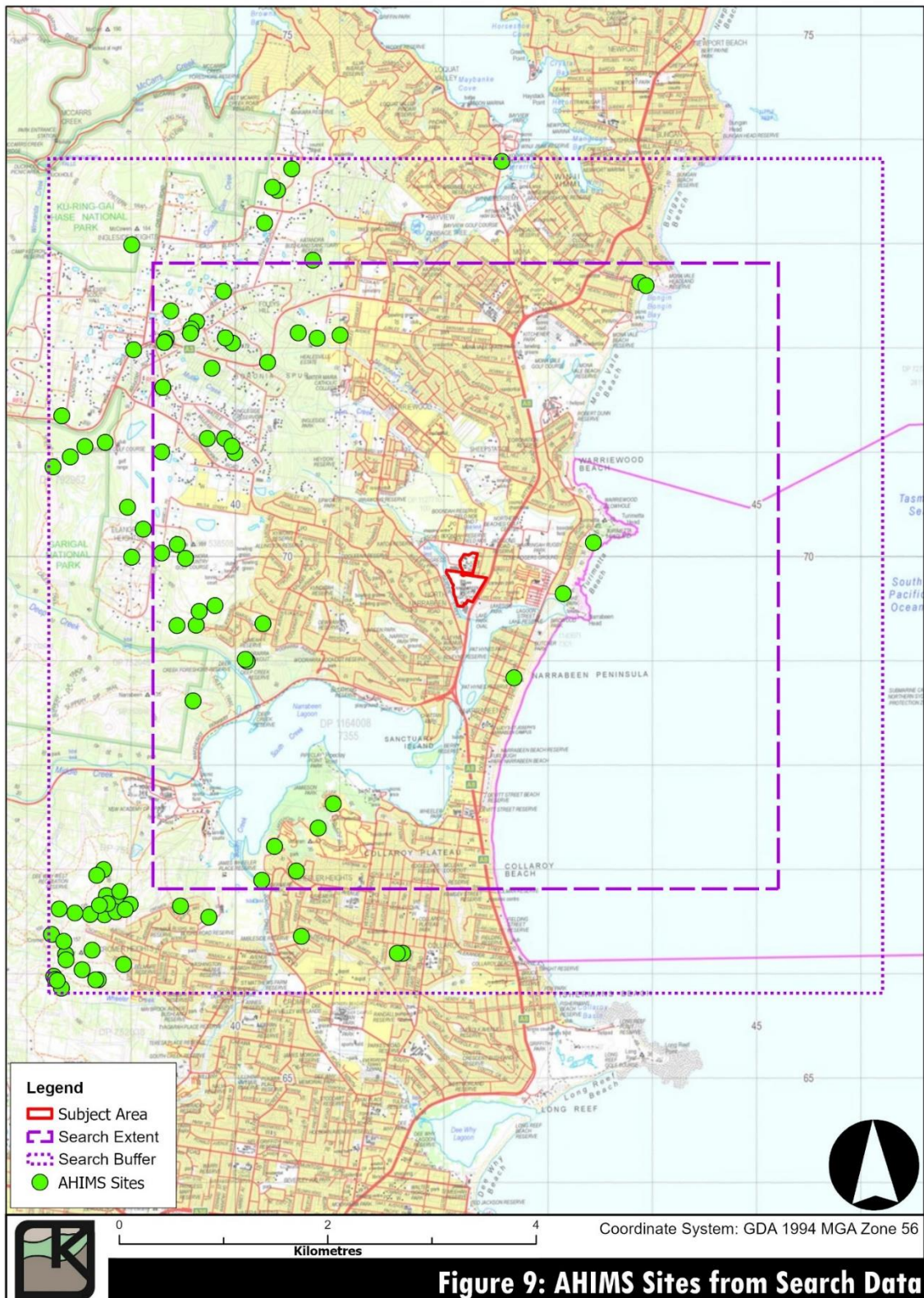


Figure 4: AHIMS Sites from Search Data (source: Kayandel (2022, p. 40))



A field survey of the Subject Area was undertaken on the 10th January 2020.

The level of ground exposure varied throughout the Subject Area but was determined to be overall very low. This was due to a large proportion of the Subject Area being covered in vegetation or with sealed ground. The majority of the Subject Area was highly disturbed, with evidence of topsoil removal, landform levelling and construction of education facilities. Visibility was a key issue within the Subject Area.

The survey targeted areas of high exposure and were inspected for any archaeological material. All mature native trees were inspected for evidence of Aboriginal cultural modification.

No Aboriginal objects or areas of Aboriginal archaeological sensitivity were identified within the Subject Area.

It was assessed that areas of high ground disturbance in the Subject Area had low archaeological potential.

It was noted in the Principal Findings (refer to Section 10) that should the design or extent of the proposed works be altered, further archaeological investigation may be necessary.

3. Assessment of SEARs Requirements

In September 2022, SINSW received the SEARs for the proposed works.

The SEARs that apply to Aboriginal heritage is:

"Heritage – including Aboriginal and non-Aboriginal cultural heritage"

- *Procedures to be followed if Aboriginal objects, including burials or skeletal material, are found at any stage of the development and include details of appropriate measures to manage unexpected finds.*

No procedures for unexpected Aboriginal objects were included as an Appendix of Kayandel (2022).

A draft procedure for managing unexpected Aboriginal objects should they be encountered during the course of the proposed works has been included as in Attachment 1.

4. Conclusion

On behalf of SINSW, Kayandel has prepared this Aboriginal heritage advice letter for the Designated Development works proposed within North Narrabeen Primary School as part of the NEP development. The assessment was informed by the outcomes of the ACHAR that was prepared to support the SSD application within NEP.

No Aboriginal objects or areas of Aboriginal archaeological sensitivity were identified within the Subject Area. It was also assessed that areas of high ground disturbance in the Subject Area had low archaeological potential.



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This Aboriginal heritage advice letter addresses the Aboriginal heritage related SEAR - procedures for unexpected Aboriginal finds (refer to Attachment 1). These procedures satisfy this SEAR requirement.

We trust this document meets the project requirements. If you have any questions about any aspect of this letter, please contact me on (02) 4627 8622.

Yours sincerely,

A handwritten signature in cursive script that reads 'N Stiles'.

Natalie Stiles

Team Leader – Heritage

B Arts (Arch/Paleo)

Grad Cert. Arts (Arch)

MGIS&RemoteSens

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References

- Chapman, G. A., Murphy, C. L., Tille, P. J., Atkinson, G., & Morse, R. J. (2009). *Soil Landscapes of the Sydney 1:100,000 Sheet map (4 ed.)*. Sydney: Department of Environment, Climate Change and Water.
- DECCW. (2010a). *Aboriginal Cultural Heritage Consultation Requirements for Proponents*. Sydney South: Department of Environment, Climate Change and Water NSW
- DECCW. (2010b). *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. Sydney South: Department of Environment, Climate Change and Water NSW,
- Kayandel. (2022). *Narrabeen Education Precinct Redevelopment, 6 & 10 Namona Street (Lot 3 DP1018621 and Lot 12 DP1119562), North Narrabeen, Northern Beaches Council LGA, NSW: Aboriginal Cultural Heritage Assessment Report*. Prepared for School Infrastructure NSW.
- OEH. (2011). *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*. South Sydney: Office of Environment and Heritage



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Attachment 1 - Protocol for Unexpected Aboriginal Finds

Procedures for Unexpected Aboriginal Finds - Proposed Ancillary Works at Narrabeen North Public School Within A Coastal Wetlands Area

As per the below SEAR for Aboriginal heritage, the following procedures for Unexpected Aboriginal Finds have been prepared.

"Heritage – including Aboriginal and non-Aboriginal cultural heritage"

- *Procedures to be followed if Aboriginal objects, including burials or skeletal material, are found at any stage of the development and include details of appropriate measures to manage unexpected finds.*

The decision flowchart for Unexpected Aboriginal Finds is presented in Figure 5.

1. Procedure to Follow in case of Unexpected Aboriginal Finds

Should previously unrecorded Aboriginal sites, or archaeological features such as shell middens, or hearths be identified during the course of the development works, the following process should be followed:

- Works must cease in the vicinity and the find should not be moved until assessed by a qualified Archaeologist;
- The Archaeologist will investigate and assess the find to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the Project Manager stating:
 - Determination of whether the find is an Aboriginal object;
 - Advice on how the project is to proceed and whether the establishment of any no-go areas is necessary;
 - Recommendation on further works that may be required and timeframe for completion of these works;
 - Any Aboriginal finds will be registered on the Aboriginal Heritage Information Management System (AHIMS). Where sites are impacted, a site impact form will be completed and lodged with AHIMS prior to impact.
- Create a no-go area around the find based upon the advice of the Archaeologist; and,
- The Archaeologist's written advice will be supplied to Heritage NSW, the Secretary and RAPs for their review. This will include a statement concerning the find, management measures implemented and notification of any further works arising.
 - RAPs are to be involved in any further assessments or works as required.
 - Any comments made by Heritage NSW, the Secretary and RAPs will be incorporated into the written advice prior to finalisation and work proceeding.

Appendix I includes visual examples of some of the different types of Aboriginal objects and site types.



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2. Procedure to follow in case of the discovery of human remains

If any suspected human remains are discovered during the proposed works, all activity in the area must cease. The following process must be undertaken:

- Immediately cease all work at that location and not further move or disturb the remains;
- Notify the NSW Police, DPIE, and Heritage NSW's Environmental Line on **131 555** as soon as practicable and provide details of the remains and their location;
- Establish an appropriate no-go area. This will need to be established in consultation with NSW Police, Heritage NSW and if necessary, a qualified Archaeologist;
- Works will not be able to recommence within the location of the find until confirmation from NSW Police and Heritage NSW is obtained. If the remains are confirmed as not being human, then works may recommence. If the remains are human then consultation with NSW Police, Heritage NSW, and the RAPs to establish a plan of management will be required;
- Works in the vicinity of the remains will only be able to recommence once the plan of management has been established and approval has been obtained from all relevant parties; and,

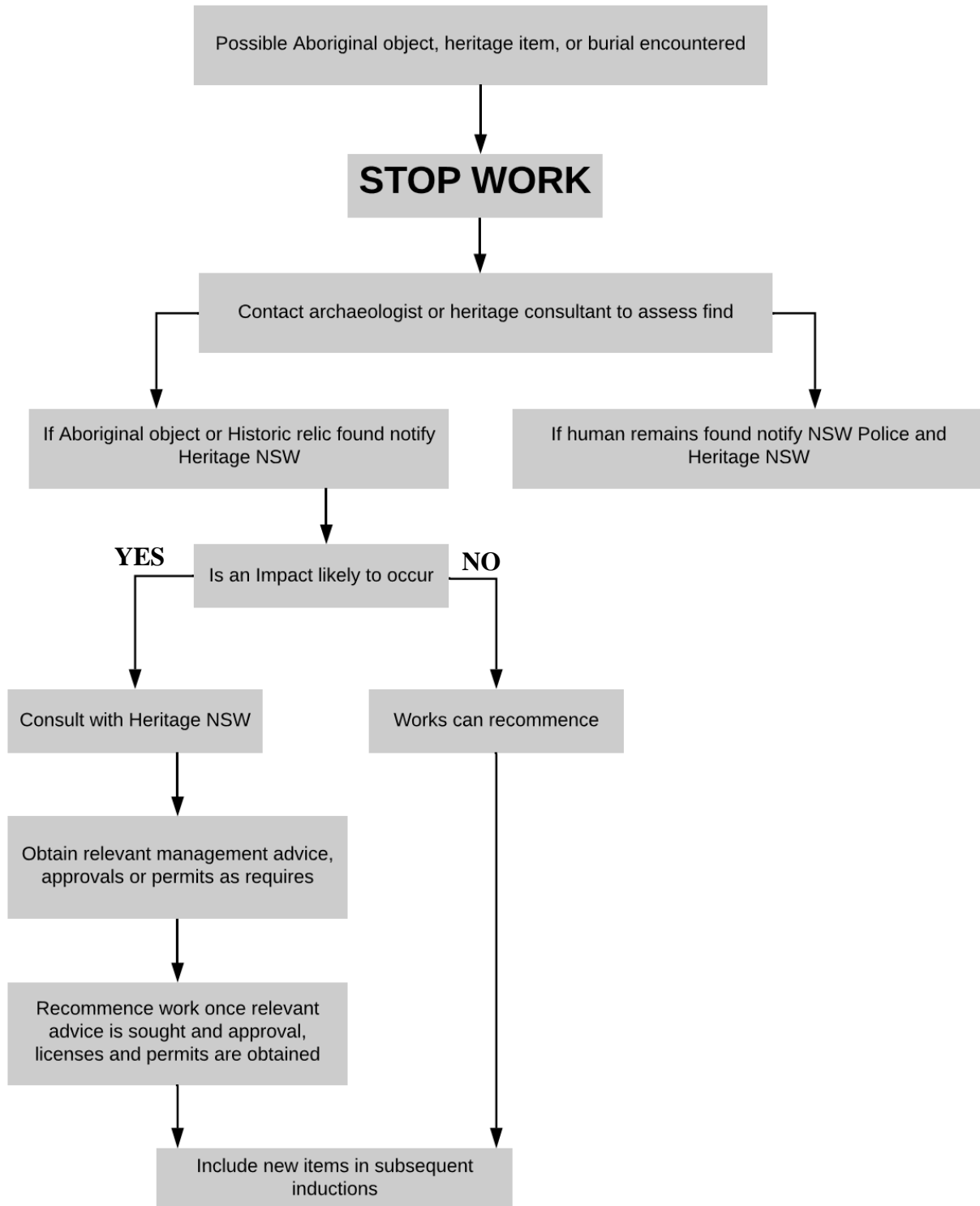


Figure 5: Decision Flowchart for Unexpected Aboriginal Finds

APPENDIX I. Types of Aboriginal objects and site types



Stone artefact



Stone artefact scatter



Shell midden

Stone Quarry



Modified/Carved Tree



Burial



Aboriginal gathering and resource location



Hearth