



McDonald excavated another area opposite CG1, known as CG3, located at 101A-105 George Street, Parramatta. She also excavated an area known as the RTA site beside CG3 (McDonald 2005c), located at 109-113 George Street, known as the RTA site G1 (McDonald 2005d). These were both important excavations, located on the Parramatta Sand Terrace, yielding a large number of artefacts. In particular the RTA site G1 provided a sequence of occupation dating from the late Pleistocene through to the mid-Holocene. The RTA site is located at the corner of George Street and Argus Lane and bound by Union Street to the south, approximately 750m to the west of the present study area. Although the site had been heavily impacted by development, the sub-surface deposits revealed an “accumulation of evidence from multiple occupation episodes, no doubt occurring at many different times” (McDonald 2005b:147). Radiocarbon dating provided a range of dates indicating continuous occupation of the site. The most important date showed that the alluvial sand terrace was possibly first occupied during the late Pleistocene period, about 30,000 years BP and then showed various phases of occupation (McDonald 2005c:107). The earliest date obtained from this site, 30,000 years BP, provides the oldest date for the Sydney Basin (McDonald 2005c:4).

These excavations by Haglund (2006 & 2007) and McDonald (2005) indicate the possibility for Aboriginal sub-surface deposits to exist despite disturbance by later development (AHIMS 45-6-2648; 45-6-2893; 45-6-1523). They also indicate the significance of the alluvial sand deposits which have become known as the Parramatta Terrace Sand (Mitchell 2008).

In 2005 Austral Archaeology undertook an assessment of 95-101 George Street, Parramatta and identified the potential for subsurface deposits to exist at that location. Austral Archaeology (2007) subsequently undertook salvage excavation of the site, which is also located on the Parramatta Terrace Sand. A total of 601 whole and broken flakes were recovered. The investigation proposed that the raw materials for the artefacts had been sourced both locally and from other regions with the prime local source being the gravel load of the Parramatta River. Other sources included the Olympic Village site, about 5km to the east, sandstone bodies to the north and west and the Nepean River, about 25km away (Austral Archaeology 2007:ii). This investigation also concluded that much of the artefact production had occurred *in situ*. Importantly, the study found that historic ground disturbance had left much of the archaeological deposit intact and the artefacts were found within the sandy matrix of the sand terrace that lay below the phases of historic occupation. The report also concluded that this is the same alluvial sand terrace identified by McDonald (2005b & c) and that the assemblage from 101 George Street is probably part of the site identified by McDonald to encompass both CG1 and RTA-G1 (McDonald 2005). Another finding from this study was the conclusion that sites closer to the Parramatta River represented occupational sites that were regularly used. Sites further from the river appeared to be more ‘opportunistic or casual use knapping events’ (Austral Archaeology 2007: iv).

In 2009 monitoring of excavations in Macquarie Street by AHMS (2009) on behalf of Sydney Water were conducted in an area predicted to contain the Parramatta Terrace Sand opposite Civic Place and at the intersection with Charles Street. The Sydney Water excavations, which were between 1.3m and to 2m in depth (AHMS 2009:18, 23) were subject to archaeological monitoring but no evidence of the terrace sand or Aboriginal objects were found (AHMS 2009:39).

Work undertaken by Haglund (2008) and Comber (2010c) at 142-154 Macquarie Street, Parramatta (the Cumberland Press site) and Comber (2010a) at 140 Macquarie Street, Parramatta (Endeavour Energy site) confirmed the location of the sand terrace, and provided additional information about occupation on the sand terrace. Both of these sites appear to be an extension of the sites excavated by McDonald (2005b & c) and Austral (2005).

The excavations at 140 Macquarie Street (Comber 2010a) identified the Parramatta Terrace Sand, partially under a clay bed, across the full extent of the site but dipping lower on the approaches to Macquarie Street and Argus Lane. This site is located approximately 200m to the west of the present study area. The Terrace Sand came to within 2m of the surface along the western border of the property. There was some evidence that the sand was dipping lower towards Macquarie Street but higher in the direction of George Street. Continuation of the sand body in this area is consistent with the predictions of Mitchell (2008). These excavations uncovered intact *in situ* archaeological deposits and approximately 60 artefacts.

In 2009 excavations at 15 Macquarie Street, Parramatta in the western portion of the Parramatta CBD (Comber 2010d) recovered approximately 350 whole and broken flaked artefacts in clay soils. This confirms evidence of Aboriginal occupation surviving across the CBD, despite later disturbance.

In 2013, Comber (in prep) undertook excavations within the footpath at Harris Street beside Robin Thomas Reserve in respect of underground electricity cabling for Endeavour Energy. These excavations identified the Parramatta Terrace Sand and uncovered 59 artefacts, including several pieces of worked glass. The excavation was on a small scale between the corner of George and Harris Street extending to the driveway into Robin Thomas Reserve. Only four test pits were excavated, which were extended where necessary. Despite the later disturbance and the small number of trenches excavated, evidence of Aboriginal occupation was uncovered. The disturbance noted during the excavation included historic and more recent building



rubble and residential rubbish tips.

The studies undertaken within Parramatta to date indicate the archaeological importance of the Parramatta Terrace Sand and the possibility for artefacts and subsurface *in situ* deposits to remain despite later urban development. All excavations on the Parramatta Terrace Sand have yielded artefacts, regardless of the post-contact use of the site. In some cases, *insitu* deposits have been located (as at 140 Macquarie Street), whilst in other excavations although *insitu* deposits have not been found, important information about Aboriginal occupation is still gained (such as at Harris Street). Despite the amount of disturbance it is still possible to gain useful information about the history of Aboriginal occupation in Parramatta. The information gained contributes to an understanding of Aboriginal land use and occupation patterns.

5.3 The Study Area

An AHIMS Search conducted on 8 December 2014 indicates that there are no registered Aboriginal sites within the present study area. This is because no previous assessments have been undertaken for this site. It does not provide a true understanding of the study area.

5.4 Site Prediction

The above environmental and archaeological information indicates that the study area is located on the Parramatta Terrace Sand. It is expected that subsurface archaeological deposits which include stone artefacts, will be located across the study area. It is possible that *insitu* evidence might remain despite the construction of the existing buildings on the site.

As there are no sandstone outcrops or platforms located within the study area, it is not expected that art sites, shelters or rock engravings would be located.

In addition, as the area has been cleared of original vegetation, it is not expected that scarred or carved trees would be located within the study area.

7.0 RESULTS AND IMPACT

RESULTS

IMPACT



6.0 RESULTS AND IMPACT

7.1 Results

The study area is a hotel and bitumen carpark. Evidence of Aboriginal occupation was not observed during the site inspection, however ground surface visibility was nil. The information gained from archaeological excavations within the Parramatta CBD, and detailed in this report, indicates that there is a high likelihood that subsurface Aboriginal deposits will exist, despite disturbance through urban development. Multiple archaeological excavations throughout Parramatta (McDonald 2005a, b, c; Haglund 2006, 2007; Austral 2007; Comber 2010a, c; Comber & Stening in prep) have indicated that the Parramatta Terrace Sand contains extensive evidence of Aboriginal occupation. Excavations within the footpath beside Robin Thomas Reserve on the opposite side of Harris Street (Comber & Stening in prep) uncovered 59 artefacts, including several pieces of worked glass. This was a very small excavation with only nine trenches excavated, yet it yielded a high number of artefacts. This indicates that not only will Aboriginal objects be present within the study area, but that it is possible that the Aboriginal archaeological deposits uncovered at the Albion Hotel could contain contact archaeology, such as glass artefacts.

7.2 Impact

Any excavation within areas of the Parramatta Terrace Sand is highly likely to impact upon Aboriginal archaeological deposits. The depth of the Terrace Sand within the study area is unknown, however the proposed development will contain five basement levels. Therefore the proposed excavation will impact upon the Parramatta Terrace Sand and is highly likely to impact upon subsurface Aboriginal archaeological deposits.

As Aboriginal “objects” are highly likely to exist within the study area and it is an offence to “harm” such “objects”, it will be necessary to undertake archaeological salvage excavations prior to the commencement of the proposed development. OEH’s *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (the Code) states that it is necessary to undertake archaeological test excavations in accordance with the Code prior to applying for an Aboriginal Heritage Impact Permit (AHIP). However the Code also states that test excavations cannot be carried out prior to the issue of an AHIP “in areas known or suspected to be conflict or contact sites” (OEH 2010a:25). Therefore an AHIP will be required prior to any archaeological excavations being undertaken.

Prior to applying for an AHIP it will be necessary to undertake community consultation in accordance with OEH’s *Aboriginal cultural heritage consultation requirements for proponents 2010*. A Research Design which clearly outlines the proposed methodology for the salvage will also need to be prepared in consultation with the Aboriginal community.

8.0 LEGISLATION



7.0 LEGISLATION

The *National Parks & Wildlife Act 1974* (NPW Act) provides statutory protection to all Aboriginal sites within New South Wales. The Office of Environment and Heritage (OEH) is the State Government agency responsible for the implementation and management of this Act.

Part 6 of the NPW Act provides provision for protection of all “Aboriginal objects” which are 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.

In particular Part 6 of the Act states that it is an offence to harm or desecrate an Aboriginal object or Aboriginal place, without an Aboriginal Heritage Impact Permit (AHIP). It is highly likely that subsurface archaeological deposits, which are protected by the provisions of Part 6 of the NPW Act, will be located within the study area and may be impacted upon by the proposed work. Therefore it will be necessary to apply for an AHIP.

To obtain an AHIP it is necessary to undertake archaeological testing in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, prior to applying for a permit. However, given the archaeological excavations in the footpath beside Robin Thomas Reserve which uncovered worked glass artefacts, this indicates that the current site has the potential to contain evidence of contact archaeology. In accordance with pages 24-25 of *The Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* if an area is known or suspected to be a contact site then testing should not occur without an AHIP. Therefore the AHIP should include provision for archaeological salvage to be undertaken in two phases. Phase 1 would be to test if Aboriginal objects were located within the study area. If objects were found, this would trigger Phase 2 salvage excavation.

To obtain an AHIP with salvage, consultation must be undertaken with the Aboriginal community in accordance with OEH’s *Aboriginal cultural heritage consultation requirements for proponents 2010*. A Research Design which clearly outlines the proposed methodology for the salvage will also need to be prepared in consultation with the Aboriginal community.

Obtaining a permit is a lengthy process. Following is an outline of the minimum time required:

Activity	Time required
Aboriginal community consultation in accordance with OEH’s <i>Aboriginal cultural heritage consultation requirements for proponents 2010</i> and commencement of Aboriginal Cultural Heritage Assessment Report (ACHAR).	16 weeks minimum (4 months)
Finalisation of Aboriginal Cultural Heritage Assessment Report (detailing the Aboriginal community consultation. This can only be completed once the consultation has been finalised)	2 weeks
Preparation of AHIP application with relevant information for submission to OEH. Documents to be forwarded to OEH: • AHIP application • This Aboriginal archaeological report • Aboriginal Cultural Heritage Assessment Report (detailing the Aboriginal community consultation. This can only be completed once the consultation has been finalised)	1 week
Receipt of permit from OEH. OEH have a service guarantee to issue the permit 8 weeks from the date of receipt of all information. After submitting the AHIP application, if OEH request further information, the clock stops and the 8 weeks recommences once they receive the further information.	8 weeks minimum
TOTAL TIME REQUIRED	27 weeks (approximately 7 months) minimum

9.0 RECOMMENDATIONS



8.0 RECOMMENDATIONS

The following recommendations are made on the basis of:

- Legal requirements under the terms of the *National Parks & Wildlife Act 1974* (as amended) which states that it is an offence to harm or desecrate an Aboriginal object without first gaining the consent of the Director General of the Office of Environment & Heritage
- Research into the Aboriginal archaeological record for the Parramatta area
- Results of the assessment as outlined in this report

IT IS THEREFORE RECOMMENDED THAT:

1. As it is highly likely that subsurface archaeological deposits, including contact artefacts made from glass, remain on this site, an Aboriginal Heritage Impact Permit will be required prior to any development. Once the AHIP has been issued archaeological salvage should be undertaken
2. Consultation in respect of the permit and excavation should be undertaken with the relevant Aboriginal stakeholders in accordance with OEH's *Aboriginal cultural heritage consultation requirements for proponents 2010*.
3. A Research Design which clearly outlines the proposed methodology for the salvage will also need to be prepared in consultation with the Aboriginal community.
4. A copy of this report should be provided to the Aboriginal stakeholders during the consultation process.

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Abbreviations

AIAS	Australian Institute of Aboriginal Studies
HRA	Historical Records of Australia
HRNSW	Historical Records of New South Wales
ML	Mitchell Library
SLNSW	State Library of New South Wales

PHOTOGRAPHS



PHOTOGRAPHS



Photograph 1: Facing south and looking at the George Street frontage of the Albion Hotel. .



Photograph 2: Facing west and looking toward the Harris Street frontage of the Albion Hotel.



Photograph 3: Facing north and looking down Harris Street toward George Street.



Photograph 4: Facing north and looking across the carpark at the rear of the Albion Hotel.



Photograph 5: Facing west and looking across the carpark at the rear of the Albion Hotel.



Photograph 6: Showing the keg slide at the side of the building, which leads to the existing basement.



Photograph 7: Facing west and looking down George Street from the corner of George Street and Harris Street.



Photograph 8: Facing west and looking across Harris Street toward the entrance to the carpark at the rear of the Albion Hotel.



Photograph 9: Facing south and looking into the beer garden at the Albion Hotel.

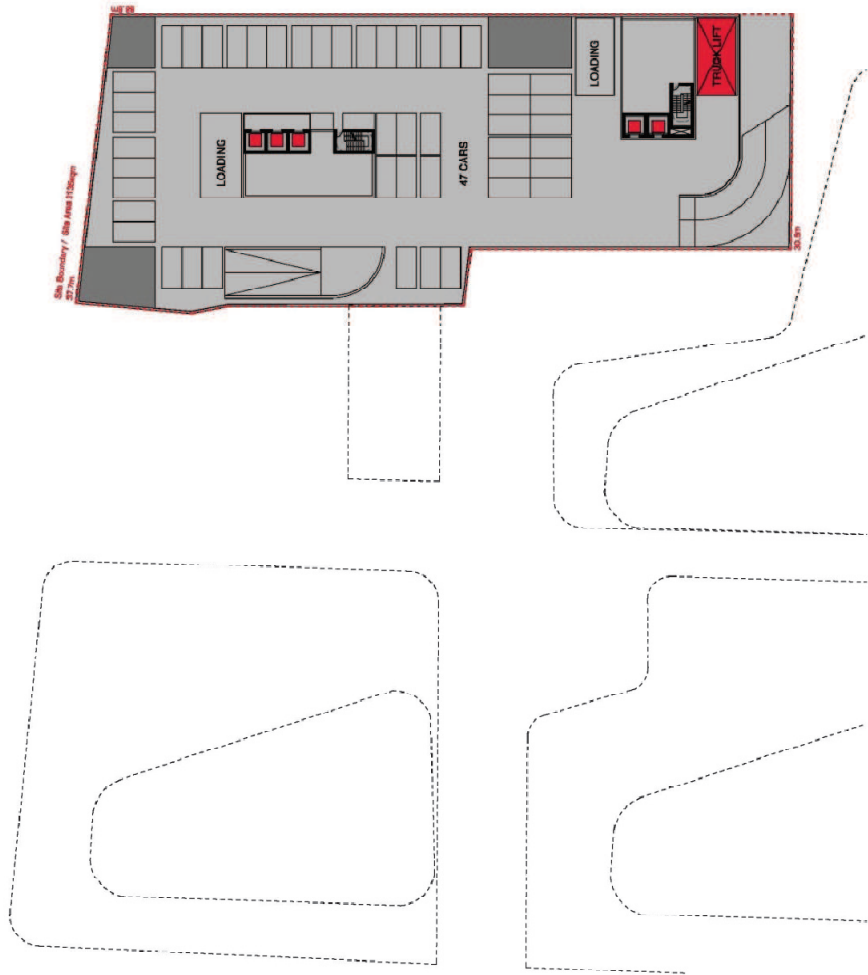
APPENDIX A

PLANS



APPENDIX A: PLANS

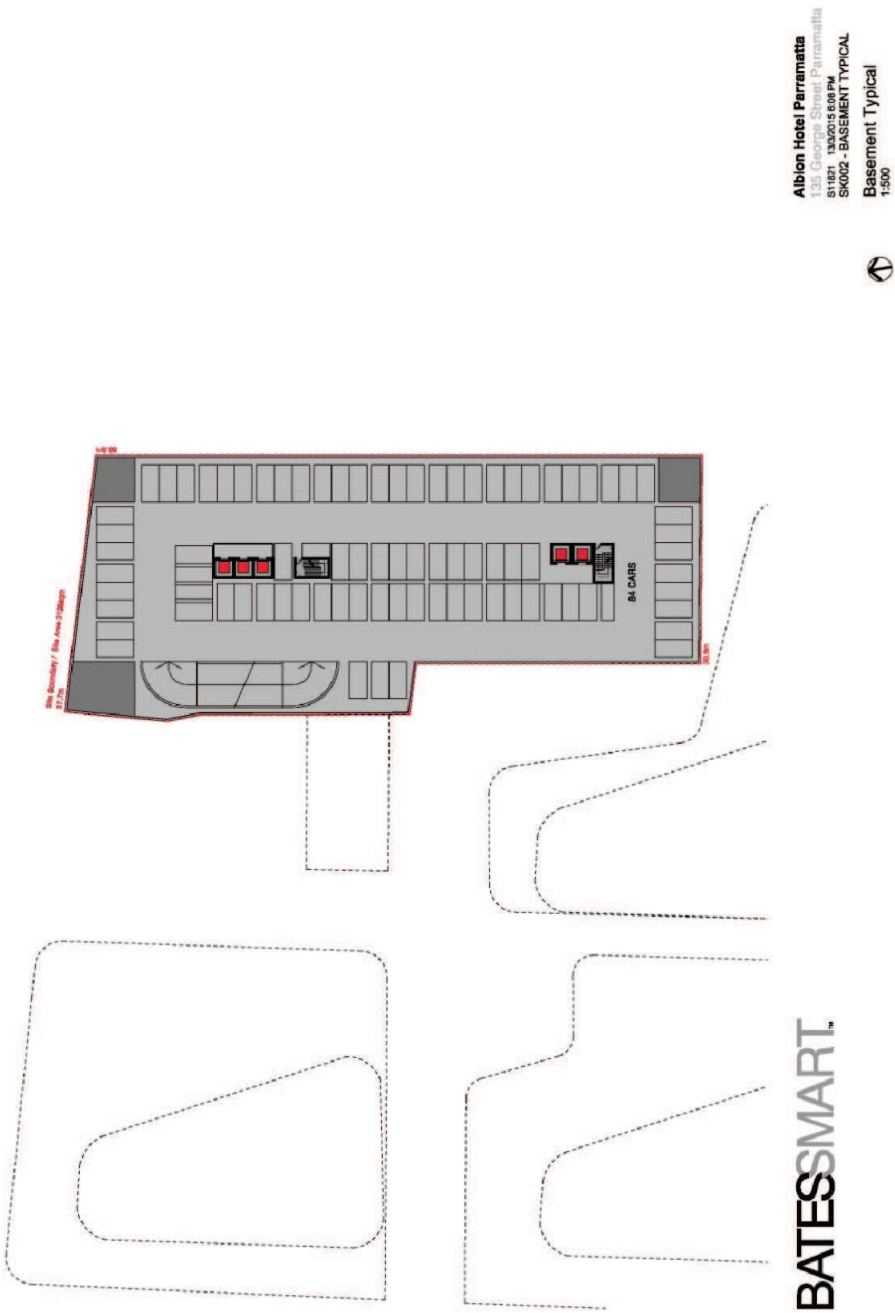




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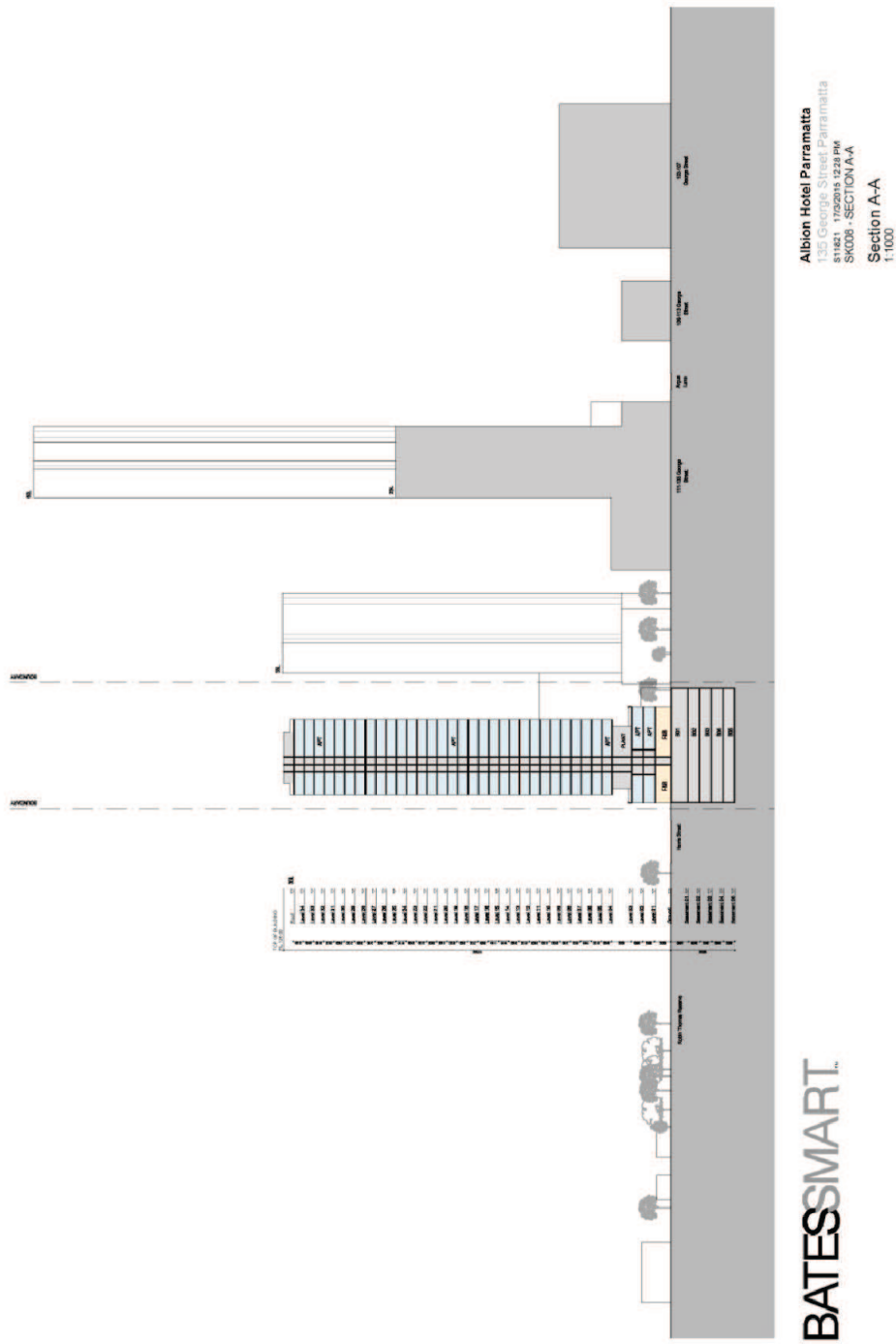


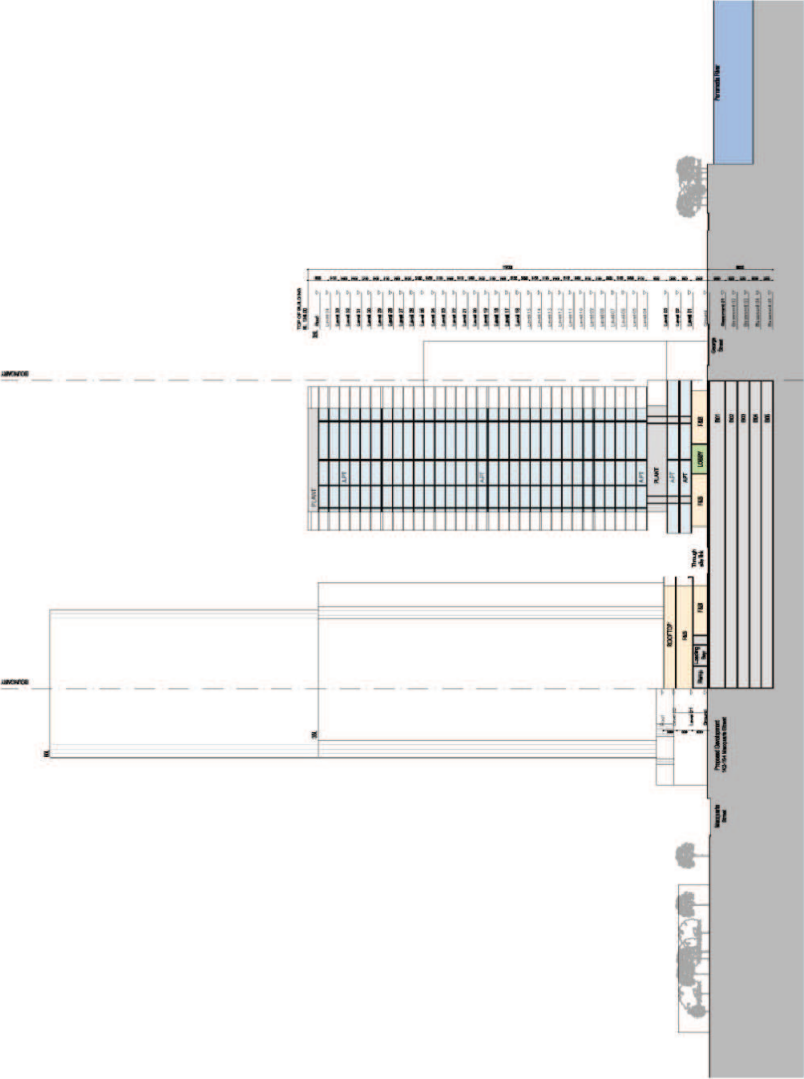












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COMBER CONSULTANTS PTY LTD

ABN 96 109 670 573

76 EDWIN STREET NORTH

CROYDON, NSW, 2132

T 02 9799 6000

F 02 9799 6011

www.comber.net.au

DIRECTOR

JILLIAN COMBER

ASSOCIATE DIRECTOR, SYSTEMS

DAVID NUTLEY

ASSOCIATE DIRECTOR, PROJECTS

TORY STENING