



ARCHAEOLOGICAL MANAGEMENT STRATEGY FOR FREMANTLE PRISON COMMISSARIAT

BY ARCHAЕ-AUS
DECEMBER 2020

DOCUMENT INFORMATION

3 December 2020

Version: FINAL 1.0

Prepared by Archae-aus Pty Ltd for the Department of Planning, Lands and Heritage.

Table 1. Archae-aus Document Control				
Version	Effective Date	Prepared By	Reviewed By	Approved Date
Draft 1.0	3/10/2020	Fiona Hook	Jim Stedman	5/10/2020
FINAL 2.0	2/12/2020		Fiona Hook	2/12/2020

Table 2. Distribution of Copies			
Version	Date Issued	Media	Issued to
Draft 1.0	5/10/2020	PDF	DPLH
FINAL 2.0	2/12/2020	PDF	DPLH

Archae-aus Project Code: DP20CT1a

CITATION: Archae-aus (2020) Archaeological Management Strategy for Fremantle Prison Commissariat. Prepared for the Department of Planning, Lands and Heritage by Archae-aus Pty Ltd, North Fremantle. December 2020.

Archae-aus Pty Ltd

1/107 Stirling Highway
North Fremantle WA 6159
PO Box 742
Fremantle WA 6959

T: 08 9433 1127

E: office@archae-aus.com.au

<http://www.archae-aus.com.au>

Project Manager: Fiona Hook

Email: fiona@archae-aus.com.au

COPYRIGHT

This report and the information contained herein is subject to copyright and may not be copied in whole or part without the written consent of the copyright holders being Archae-aus Pty. Ltd. and the Department of Planning, Lands and Heritage.

DISCLAIMER

The authors are not accountable for omissions and inconsistencies that may result from information which may come to light in the future but was not forthcoming at the time of this research.

The information contained in this Archaeological Management Strategy relates only to the works detailed in the Scope of Works, which is outlined in Section One.

AUTHORSHIP

The author is Fiona Hook (BA (Hons) *Sydney University*). Editorial assistance was provided by Jim Stedman (BA (Hons) *University of Manchester*, *MMArch University of Western Australia*).

ACKNOWLEDGEMENTS

The authors would like to acknowledge the assistance of Daniel Holland from the Department of Planning, Lands and Heritage in the production of this report.

STRUCTURE AND FORMAT

This Archaeological Management Strategy (AMS) was drafted in accordance with guidelines set out by the Heritage Council of Western Australia (Heritage Council of Western Australia 2019).

- Section 1 includes an introduction and background to the project with details of the scope of works.
- Section 2 includes a historical background of the Fremantle Prison Commissariat Project Area.
- Section 3 describes the archaeological context of the Project Area and provides a summary of previous archaeological work undertaken there.
- Section 4 includes assessments of the Project Area's archaeological significance.
- Section 5 outlines proposed heritage management strategies.
- Section 6 concludes the report and provides recommendations for the future management of the Project Area's archaeological values.

TERMS AND ABBREVIATIONS

Term / Abbreviation	Meaning / Interpretation
AHA	Aboriginal Heritage Act 1972 (WA)
AMS	Archaeological Management Strategy
AMP	Archaeological Management Plan
Archaeologist	See Project Archaeologist.
Archaeological Site	A place (or group of places) where evidence of past human activity is preserved (either prehistoric, historical or contemporary), and which has been, or may be, investigated using the discipline of archaeology.
Artefact	Any object made, affected, used, or modified in some way by humans.
Assessment	Professional opinion based on information that was forthcoming at the time of consideration.
DPLH	Department of Planning, Lands and Heritage. Comprises the former WA State government bodies of the State Heritage Office and the Department of Aboriginal Affairs.
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999
Excavation	The systematic and scientific recovery of archaeological material as a means of obtaining data about past human activity.
Feature	A non-moveable element of an archaeological site such as a pit, ditch or hearth. A feature is evidence of past human activity.
Find	Individual artefacts. Also known as 'loose find'.
Ground Disturbing Works	These are defined as any activity that disturbs the ground surface. This can include activities such as topsoil clearing, grubbing, geotechnical testing, grading, cutting, trenching, potholing pits, deep excavation and directional drilling (launch and retrieval pits).
HA	Heritage Act 2018
Heritage site / place	See 'Archaeological site'
HMP	Heritage Management Plan
Loose Find	See 'Find'.
Monitoring	Monitoring, sometimes called an Archaeological Watching Brief, is when an archaeologist monitors ground disturbing activities to ensure that archaeological material is not adversely impacted.
Project Archaeologist	The archaeologist appointed to manage the archaeological and heritage concerns of a project.
Salvage	Process of the retrieval of as much cultural information as possible from an archaeological site before it is damaged or destroyed by development.
SHO	State Heritage Office, now amalgamated into the DPLH.
Scope of Works	The nature of the work undertaken as requested by the proponent or developer.

TABLE OF CONTENTS

TERMS AND ABBREVIATIONS	4
TABLE OF CONTENTS	5
LIST OF FIGURES	7
LIST OF MAPS	7
LIST OF PLATES	7
LIST OF TABLES	7
SECTION ONE – INTRODUCTION	8
SCOPE OF WORK.....	8
BACKGROUND.....	9
ARCHAEOLOGICAL MANAGEMENT STRATEGY	10
SITE VISIT	10
LEGISLATION AND GUIDING DOCUMENTS	14
The Burra Charter	14
The World Heritage Convention 1972	15
Environment Protection and Biodiversity Conservation Act 1999	16
Aboriginal Heritage Act 1972.....	17
Noongar Standard Heritage Agreement / Indigenous Land Use Agreement	17
The Heritage of Western Australia Act 1990 (repealed)	17
Heritage Act 2018	17
The Planning and Development Act 2005	18
HERITAGE LISTINGS	19
Historical Heritage Listings	19
World Heritage Listing	19
State and National Heritage Listing	19
Governing Legislation	19
SECTION TWO – HISTORICAL BACKGROUND AND CONTEXT	20
PRISON HISTORY	20
SECTION THREE – ARCHAEOLOGY OF THE PLACE.....	22
PAST ARCHAEOLOGICAL WORK.....	22
Eureka 2010	22
Steward’s Office.....	23
Clerk’s Office.....	24
ARCHAEOLOGICAL POTENTIAL.....	25
RISK ASSESSMENT	25
SECTION FOUR – ARCHAEOLOGICAL SIGNIFICANCE.....	26

Zones of Archaeological Sensitivity	26
ZONES OF SIGNIFICANCE (EXTENT HERITAGE ADVISORS 2019)	28
RESEARCH QUESTIONS	28
SECTION FIVE - ARCHAEOLOGICAL MANAGEMENT STRATEGIES	29
INTRODUCTION	29
GUIDING PRINCIPLES.....	29
The Opportunities.....	29
Overarching Policy Framework.....	29
OBLIGATIONS	30
Statutory Framework.....	30
Non-Statutory Framework.....	31
MANAGEMENT STRATEGY	31
SECTION SIX – RECOMMENDATIONS	34
RECOMMENDATIONS.....	34
REFERENCES	36
APPENDIX ONE – ARCHAEOLOGICAL MONITORING PROCEDURE.....	37
APPENDIX TWO – ARCHAEOLOGICAL DISCOVERY PROCEDURE	38
Surface Finds.....	41
Sub-Surface Material / Sites	41
PROCEDURE FOR THE DISCOVERY OF HISTORICAL FEATURES/FINDS.....	41
PROCEDURE FOR THE DISCOVERY OF HUMAN REMAINS	42
APPENDIX THREE – FIND RECORDING AND COLLECTION PROCEDURES.....	43
LOOSE FIND RECORDING PROCESS.....	43
FEATURE RECORDING PROCESS	44
COLLECTION PROTOCOLS.....	44
STORAGE PROCESS.....	44
APPENDIX FOUR – CONTRACTOR PROCEDURE HANDOUT.....	45
PROCEDURE - ARCHAEOLOGICAL FINDS DISCOVERY.....	46
APPENDIX FIVE – REFERENCE MATERIAL.....	48
APPENDIX SIX – SCOPE OF WORK TECHNICAL DRAWINGS.....	57

LIST OF FIGURES

Figure 1. Commissariat 2020 (Image Source: Archae-aus).....	9
Figure 2. Floor plan of the proposed works – ground floor (Image Source: DPLH, Archae-aus).....	12
Figure 3. Floor plan of the proposed works – basement (Image Source: DPLH, Archae-aus).....	13
Figure 4. Commissariat basement – approximate location of Eureka (2010) excavations (Image Source: DPLH).....	22
Figure 5. Eureka (2010: 5) Steward’s Office excavation area (view east).....	23
Figure 6. Eureka (2010: 5) Steward’s Office top of levelling layer.....	23
Figure 7. Eureka (2010: 8 and 9) Clerk’s Office excavation area start and finish (scale – 1 m).....	24
Figure 8. Bavin (1990) Fremantle Prison Compound – Archaeological Zoning Plan (Project Area in red).....	27
Figure 9. Project Area map.....	48
Figure 10. 1856 Block Plan.....	49
Figure 11. 1856 Plan as per Bavin 1990b, Figure 5.8.....	50
Figure 12. 1862 Construction Plan as per Bavin 1990b.....	51
Figure 13. 1907 – 1908 Construction Plan as per Bavin 1990b.....	52
Figure 14. 1919 Electrical Engineer’s Plan.....	53
Figure 15. 1987 Site Plan.....	54
Figure 16. Zoning Plan – Bavin 1990b.....	55
Figure 17. 1935 Aerial Imagery (SLWA Call No 031598PD).....	55
Figure 18. 1948 Aerial Imagery.....	56

LIST OF MAPS

Map 1. Fremantle Prison Commissariat Project Area.....	11
--	----

LIST OF PLATES

Plate 1. Aboriginal flaked artefact (quartz).....	38
Plate 2. Aboriginal ground-edge axe (dolerite).....	38
Plate 3. 19th Century pottery sherds.....	38
Plate 4. Clay tobacco pipes.....	38
Plate 5. Historical clear glass bottle.....	39
Plate 6. Historical brick.....	39
Plate 7. Hand forged nail.....	39
Plate 8. Buttons.....	39
Plate 9. Historical limestone wall footings.....	39
Plate 10. Historical brick surface.....	39
Plate 11. 19 th Century well and drain.....	40
Plate 12. Storage tubs.....	43
Plate 13. Storage tubs.....	43

LIST OF TABLES

Table 1. Archae-aus Document Control.....	2
Table 2. Distribution of Copies.....	2
Table 3. Management Strategy and Risk Assessment.....	32
Table 4. Appendices for Management Procedures.....	33

SECTION ONE – INTRODUCTION

SCOPE OF WORK

Fremantle Prison is located at 1 The Terrace, Fremantle, Western Australia. It comprises Crown Land Reserve 24042. The Prison site extends for approximately 6 hectares, and is bounded by Hampton Road to the east, Fothergill Street to the south, The Terrace to the west and Knutsford Street to the north.

The Fremantle Prison Commissariat is part of the north wing of the Main Cell Block, located in the basement area, that dates to the earliest phases of the site's use. For the purposes of this report the Commissariat (the Project Area) is defined by the area outlined in red on Map 1 and is based on the floor and location plans provided by Department of Planning Lands and Heritage (DPLH) (Figure 2, Figure 3, Appendix 6). As part of ongoing maintenance and refurbishment works, Fremantle Prison are planning to complete the following works on both the Ground Floor and in the Basement of the Commissariat:

- Works Area 1: Ground Floor, New Division Alleyway and Walkway - removal of bitumen and concrete vault capping (see Figure 2, Figure 3);
- Works Area 2: Basement, North Yard – stabilisation of ramp and conservation of timber treads and instillation of soakwells and breathing strips (see Figure 3);
- Work Area 3: Ground Floor & Basement, Special Handling Unit - removal of later concrete and steel stairs (see Figure 3);
- Work Area 3: Ground Floor & Basement, Special Handling Unit - installation of a new accessibility platform lift (and service pit below) (see Figure 3);
- Works Area 4: Ground Floor & Basement, 4 Division Yard and South Yard – stabilisation of rubble wall and clean-up and instillation of soakwells and breathing strips (Figure 3);
- Works Areas 5, 6 & 7: Basement, Issuing Office, Clerks Office, Stewards Office, Clothing Store, Provision Store - refurbishment of ceilings (see Figure 3);
- Works Areas 5, 6 & 7: Basement, Issuing Office, Clerks Office, Stewards Office, Clothing Store, Provision Store - refurbishment of original floorboards, flagstones and replacement of damaged floor joists in the former offices (see Figure 3);
- Works Areas 5, 6 & 7: Basement, Issuing Office, Clerks Office, Stewards Office, Clothing Store, Provision Store - refurbishment of windows, doors and other fixtures (see Figure 3); and
- Work Area 8: Basement, West Yard - installation of new sub-surface infrastructure (e.g. soak-wells and breathing strips) (Figure 2, Figure 3).

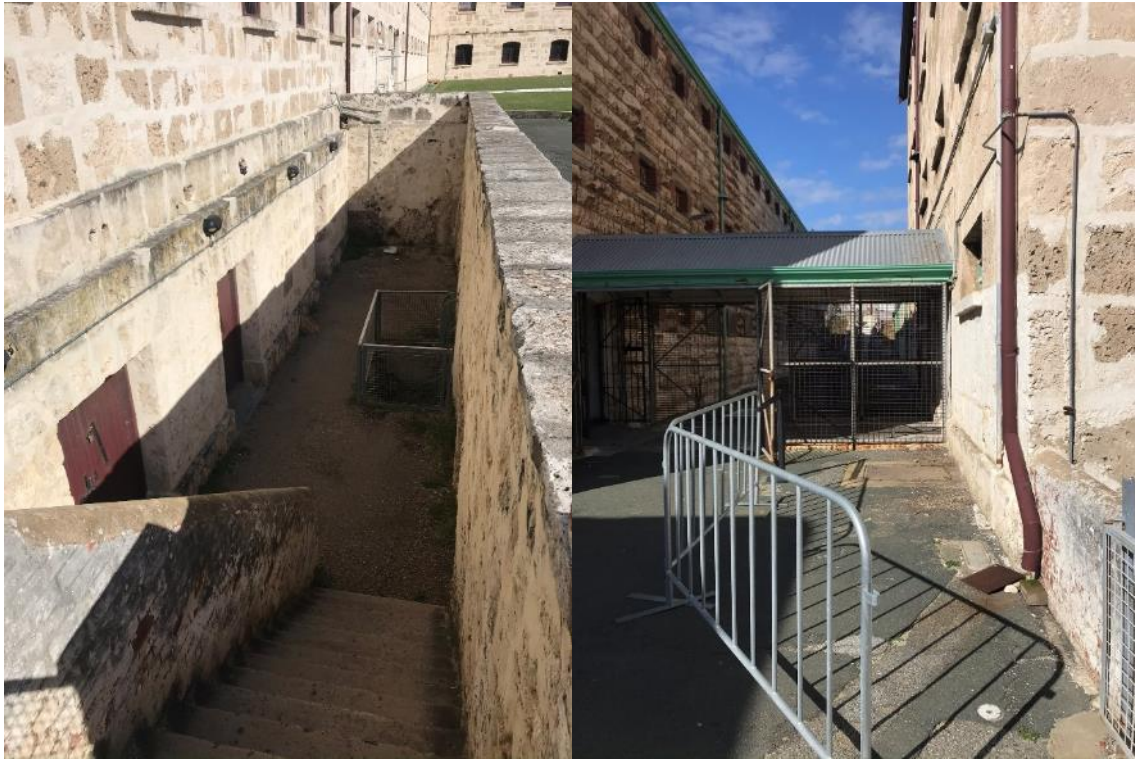


Figure 1. Commissariat 2020 (Image Source: Archae-aus)

Owing to the fact that these works are likely to have an impact on ceiling deposits, underfloor deposits, recess deposits and sub-surface archaeological deposits, Archae-aus was contracted by the Department of Planning, Lands and Heritage (DPLH) to draft this Archaeological Management Strategy (AMS) in order to minimise and manage the impact to the Commissariat's archaeological record during the upgrade works.

BACKGROUND

Fremantle Prison is listed on both the World Heritage List (WHL) and National Heritage List (NHL) for embodying a range of heritage values. It is also included on the Western Australian State Register of Heritage Places (SRHP) for meeting a broader range of heritage assessment criteria (Department of Planning Lands and Heritage 2019). The Prison is one of 11 historical sites that together form the Australian Convict Sites World Heritage Property and is the only World Heritage Listed building complex in Western Australia. With regard to the management of archaeology at the Prison, the Fremantle Prison Heritage Management Plan (Extent Heritage Advisors 2019) identifies objectives as:

- to minimise disturbance of the archaeological resource at Fremantle Prison;
- to retain the archaeological resource at Fremantle Prison *in situ* unless this is precluded by overwhelming research, safety or conservation considerations;
- within the parameters of the above objectives, to maximise the research potential of the archaeological resource at Fremantle Prison;
- to balance the conservation needs of the layered heritage values at Fremantle Prison, including where those values are embodied by archaeological material from different periods;
- to investigate the archaeological resource at Fremantle Prison using 'best practice' archaeological methodologies and experienced practitioners; and
- to harness the potential of archaeology to engage the public's interest in Fremantle Prison.

ARCHAEOLOGICAL MANAGEMENT STRATEGY

The Heritage Council of Western Australia describes an Archaeological Management Strategy (AMS) as a document designed to provide practical strategies for the management of the archaeological components of a place (Heritage Council of Western Australia 2019). An AMS should largely be used to supplement an Archaeological Management Plan (AMP), which provides a comprehensive assessment of the archaeological potential and significance of a site, as well as guidelines for appropriate management. The policies and management recommendations provided in an AMP may require some further practical strategies for their implementation to be outlined prior to the commencement of works that may adversely impact the archaeological potential of a place. In addition, proposed works or unanticipated events may also reveal information / sites that have not been addressed in the AMP, or considerable time may have passed since its completion. An AMS aims to address the specifics of a proposed or potential impact to the archaeology of a place, with reference to the policies and research design in the AMP. In summary, the objectives of an AMS are to:

- summarise the study area and its history as outlined in the AMP;
- analyse the research strategy and management recommendations provided in the AMP with regard to the site's current context;
- develop a practical guide to investigations which ensures adequate protection of the resource and produces maximum research benefits from the archaeological resource; and
- to outline how the archaeological evidence will be handled.

SITE VISIT

On 8 September 2020, Fiona Hook (Archae-aus) visited the site for an inception meeting and viewing of the Commissariat with Daniel Holland (DPLH) and representatives from Fremantle Prison. After discussions the decision was made to focus the AMS on how to manage different types of activities within the Commissariat.

382200

382300

382400

382500

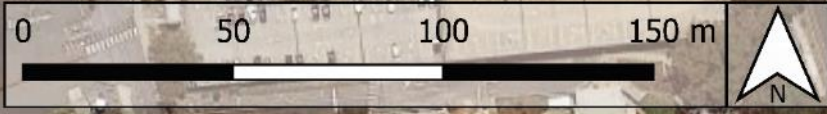
6453000

6452900



6452800

6452700

6452600



Legend

-  Fremantle Prison Perimeter Wall
-  Project Area



Map 1. Commissariat Project Area

Drafted by Archae-aus, 27/09/2020.
GDA94, Zone 50.
Satellite imagery courtesy of Google Maps.

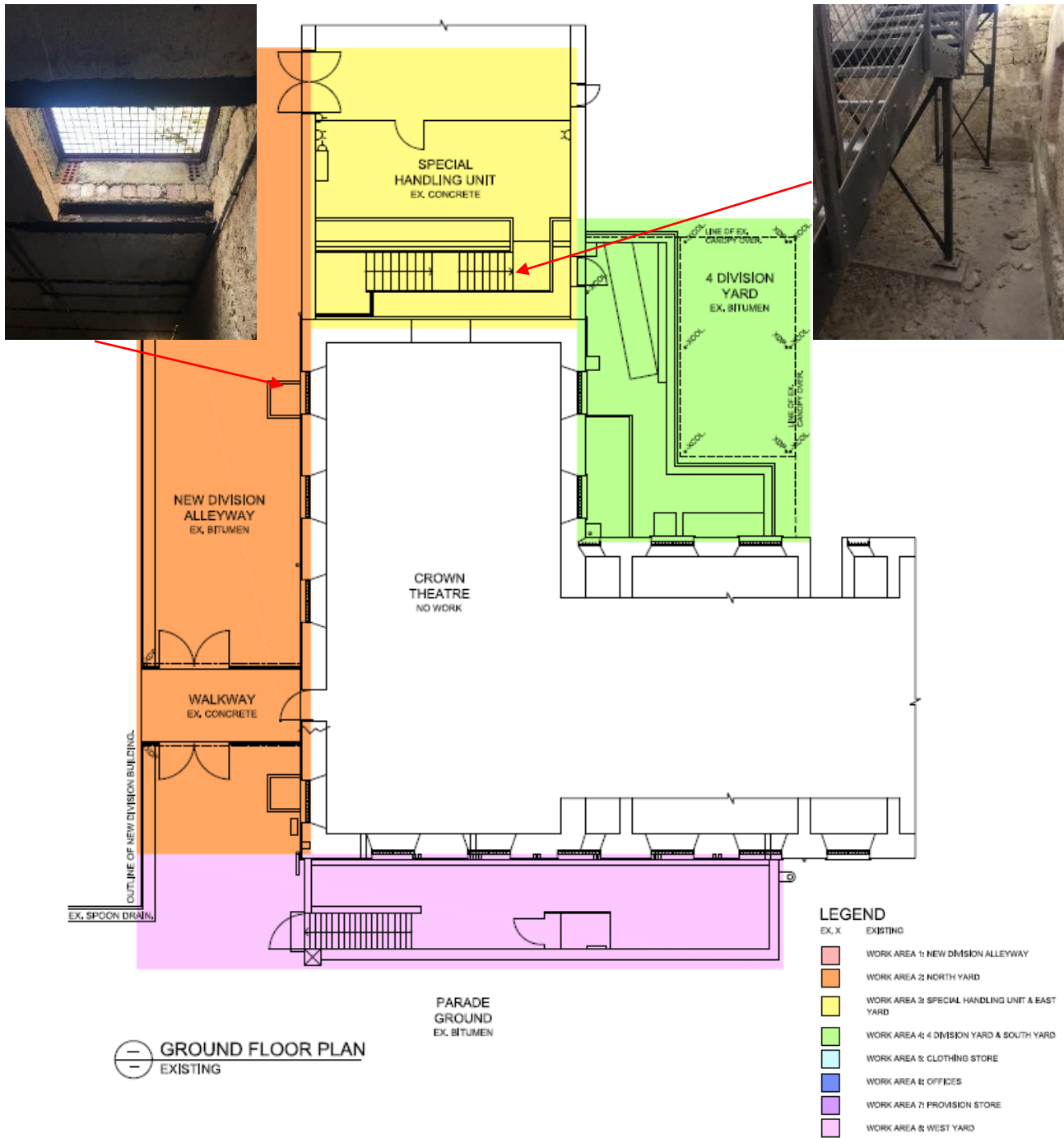
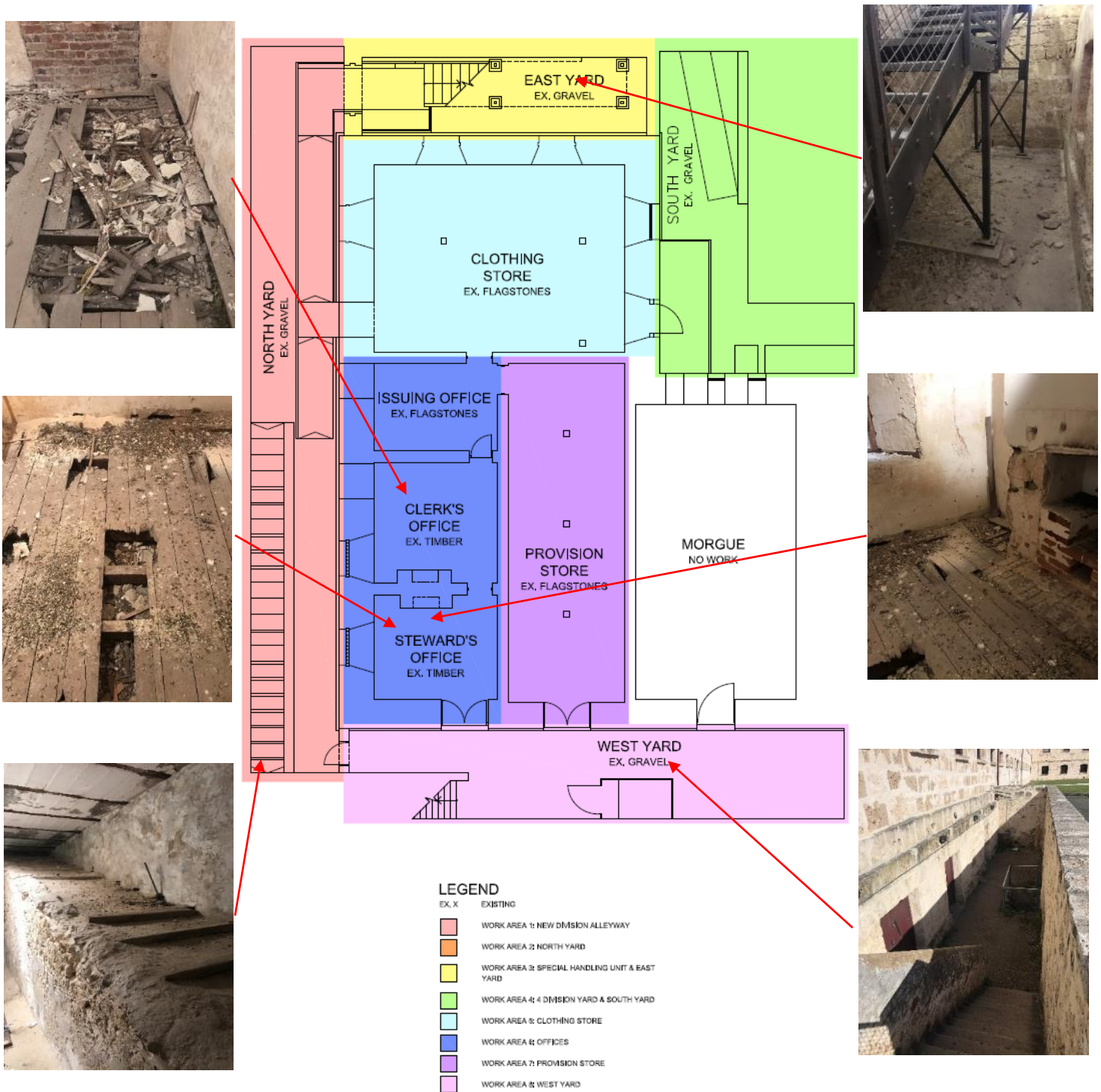


Figure 2. Floor plan of the proposed works – ground floor (Image Source: DPLH, Archae-aus)

Figure 3. Floor plan of the proposed works – basement (Image Source: DPLH, Archae-aus)



LEGISLATION AND GUIDING DOCUMENTS

The following section summarises the relevant legislation and guiding principles that may relate to the Project Area.

The Burra Charter

The Burra Charter (Australia ICOMOS Charter for Places of Cultural Significance) is the key document for conserving Australia's cultural heritage. The Charter encapsulates two important aspects in conserving heritage places. First, it establishes the best practice principles and processes for understanding and assessing a place's significance, as well as developing and implementing a conservation plan. Second, the Charter defines and explains the four primary cultural values that may be ascribed to any place: aesthetic, historic, social or spiritual and scientific. These values are essential as they delineate the types and quality of information needed to accurately determine a heritage place's significance¹.

The following articles of the Burra Charter (Burra Charter 2013) have relevance for the assessment of risk and the management of heritage:

Article 2. Conservation and management

- Places of cultural significance should be conserved.
- The aim of conservation is to retain the cultural significance of a place.
- Conservation is an integral part of good management of places of cultural significance.
- Places of cultural significance should be safeguarded and not put at risk or left in a vulnerable state.

Article 3. Cautious approach

- Conservation is based on a respect for the existing fabric, use, associations and meanings. It requires a cautious approach of changing as much as necessary but as little as possible.
- Changes to a place should not distort the physical or other evidence it provides, nor be based on conjecture.

Article 7. Use

- Where the use of a place is of cultural significance it should be retained.
- A place should have a compatible use.

Article 8. Setting

- Conservation requires the retention of an appropriate setting. This includes retention of the visual and sensory setting, as well as the retention of spiritual and other cultural relationships that contribute to the cultural significance of the place. New construction, demolition, intrusions or other changes which would adversely affect the setting or relationships are not appropriate.

Article 9. Location

- The physical location of a place is part of its cultural significance. A building, work or other element of a place should remain in its historical location. Relocation is generally unacceptable unless this is the sole practical means of ensuring its survival.
- Some buildings, works or other elements of places were designed to be readily removable or already have a history of relocation. Provided such buildings, works or other elements do not have significant links with their present location, removal may be appropriate.

¹ <https://australia.icomos.org/wp-content/uploads/The-Burra-Charter-2013-Adopted-31.10.2013.pdf>

- If any building, work or other element is moved, it should be moved to an appropriate location and given an appropriate use. Such action should not be to the detriment of any place of cultural significance.

In addition, based on the Burra Charter's guiding principles around Indigenous Cultural Heritage Management (Australian ICOMOS 2013), the following considerations and approaches should be made:

- That the definition of 'place' is broad when applying it to Indigenous places of cultural significance and can include locations that embody spiritual value, sacred landscapes, places of social and historical value, archaeological sites with scientific value, and even single artefacts in some cases. It can also include several related locations that combine to form a single 'place' (i.e. a Songline), or several sites that form a cultural landscape or route.
- That the concept of 'Cultural Significance', as defined by the Burra Charter, includes Indigenous places of cultural significance which can include intangible heritage. The values that are used to assess this significance must consider Indigenous perspectives. In some cases, places may have both Indigenous and non-Indigenous values.
- That heritage practitioners should listen carefully to Indigenous views and include those views in significance assessments in an unbiased and objective manner.
- That the appropriate people should be consulted with and it must be recognised that there are different types of Indigenous connections to places – including ancestral, traditional and historical.
- That generalisations should be avoided when identifying and assessing Indigenous heritage places and it should be recognised that Indigenous culture is multidimensional. The location and extent of places of cultural significance should be clearly defined.
- That Indigenous heritage values can change over time, in some cases resulting in the change in cultural significance of a place over time.
- That intangible heritage can play a key part of the significance of a place.
- That there is an awareness that Indigenous cultural protocols may limit the information that is able to be shared and used for significance assessments. This should be respected, and an assessment of significance should acknowledge where there may be any limitations in the sharing of information.
- That consent should be obtained from the Traditional Owners if material cultural is to be removed from its original setting for scientific analysis or exhibition. This would include materials that have been salvaged from the surface or retrieved from excavations – including materials that are sent for dating analysis.
- That the significance assessment of a place should include an analysis of the objects that are associated with that place.

The World Heritage Convention 1972

The World Heritage Convention (the Convention) was adopted at the General Conference of the United Nations Educational, Scientific and Cultural Organization (UNESCO) meeting in November 1972. In recognition of the threats to natural and cultural heritage, the Convention "links together in a single document the concepts of nature conservation and the preservation of cultural properties. The Convention recognises the way in which people interact with nature, and the fundamental need to preserve the balance between the two."²

The Convention is a global instrument for the protection of cultural and natural heritage. The World Heritage Convention aims to promote cooperation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations. To be included on the World Heritage List, the host country must have ratified the Convention and the nominated sites must be of outstanding universal value to meet at least one out of ten selection criteria.³ Management

² <https://whc.unesco.org/en/convention/>

³ <https://whc.unesco.org/en/criteria/>

arrangements are required for each Australian property included on the World Heritage List. The Commonwealth considers such plans as vital in implementing Australia's obligations under the World Heritage Convention. Importantly, all of Australia's declared World Heritage properties are also on Australia's National Heritage List and are also considered National Heritage places. As a result, an action may result in a significant impact on both World Heritage values and National Heritage values of a declared World Heritage property/National Heritage place.

Since the criteria and processes for National Heritage listing differ from those for World Heritage listing, the National Heritage values protected under section 15 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) usually differ from the World Heritage values protected under section 12 of the EPBC Act (see EPBC Act description in section below). The boundary of the National Heritage place may also differ from the boundary of the declared World Heritage property, so it is important to check the National Heritage listing(s) relevant to a particular declared World Heritage property. Several Australian World Heritage properties are also home to or overlap with other matters of National Environmental Significance (NES) such as migratory species, Ramsar wetlands or the Commonwealth marine environment.⁴ It is important to note that the buffer zones of Australian World Heritage properties are not protected under the World Heritage Conventions; rather the buffers are managed by State and Local legislation.

Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act) is the Australian Government's central piece of environmental legislation. It provides a legal framework to protect and manage nationally and internationally important flora, fauna, ecological communities and heritage places — defined in the EPBC Act as matters of national environmental significance – including Australia's World Heritage Properties

The EPBC Act enhances the management and protection of Australia's heritage places - natural, historic or Indigenous places - that are of outstanding national heritage value to the Australian nation as well as heritage places on Commonwealth lands and waters or under Australian Government control.

A declared World Heritage property is an area that has been included in the World Heritage List or declared by the Minister to be a World Heritage property. The National Heritage List includes natural, historic and Indigenous places of outstanding heritage value. The Commonwealth Heritage List comprises natural, Indigenous and historic heritage places on Commonwealth lands and waters or under Australian Government control.

Once a heritage place is listed under the EPBC Act, special requirements come into force to ensure that the values of the place will be protected and conserved for future generations. The EPBC Act provides for the preparation of management plans which set out the significant heritage aspects of the place and how the values of the site will be managed.

World heritage properties and national heritage places are recognised as a matter of national environmental significance under the EPBC Act. Consequently, any action that is likely to have a significant impact on heritage properties and places must be referred to the Minister and undergo an environmental assessment and approval process.⁵

The EPBC Act also regulates actions that may have a significant impact on the World Heritage values of declared World Heritage properties. Section 12 of the EPBC Act provides that a person must not take an action that has or will have or is likely to have a significant impact on the World Heritage values of declared World Heritage properties. Significant impact guidelines have been developed to provide overarching guidance on determining whether an action is likely to have a significant impact on a matter protected under national environment law.

⁴ <http://www.environment.gov.au/heritage/about/world/management-australias-world-heritage-listed/managing-world-heritage-australia/protecting-world-heritage>

⁵ <http://www.environment.gov.au/epbc/what-is-protected/world-heritage>

Aboriginal Heritage Act 1972

Western Australia's *Aboriginal Heritage Act 1972* (the *AHA*) is the main legislative framework for Aboriginal heritage in the State. All important and significant Aboriginal heritage sites and objects are protected under it. The *AHA* protects sites and objects that are significant to living Aboriginal people as well as Aboriginal sites of historical, anthropological, archaeological and ethnographic significance. The *AHA* is currently administered by the Department of Planning, Lands and Heritage in Perth.

For archaeological places, the primary sections of the *AHA* that need to be considered are section 5 which defines the term 'Aboriginal Site' and section 39 (2) which details what the Aboriginal Cultural Materials Committee (ACMC) should have regards to in considering the importance of objects and places.

A registered Aboriginal site is a place that fulfils the following definitions for protection under section 5 of the *AHA*:

- Any place of importance and significance where persons of Aboriginal descent have, or appear to have, left any object, natural or artificial, used for, or made or adapted for use for, any purpose connected with the traditional cultural life of the Aboriginal people, past or present.
- Any sacred, ritual or ceremonial site which is of importance and special significance to persons of Aboriginal descent.
- Any place which, in the opinion of the Committee, is or was associated with the Aboriginal people and which is of historical, anthropological, archaeological or ethnographical interest and should be preserved because of its importance and significance to the cultural heritage of the State.
- Any place where objects to which this Act applies are traditionally stored, or to which, under the provisions of this Act, such objects have been taken or removed.

Section 17 of the *AHA* states that it is an offence to: *alter an Aboriginal site in any way, including collecting artefacts; conceal a site or artefact; or excavate, destroy or damage in any way an Aboriginal site or artefact; without the authorisation of the Registrar of Aboriginal Sites under section 16 or the Minister of Aboriginal Affairs under section 18 of the AHA.*

Noongar Standard Heritage Agreement / Indigenous Land Use Agreement

The intention behind the Noongar Standard Heritage Agreement is the establishment of a proactive rather than reactive heritage management system across the southwest of Western Australia. It is called the Noongar Standard Heritage Agreement because it is a template agreement for each of the six Noongar Regional Corporations and its aim is for heritage matters in a region to be managed through the respective Noongar regional corporation. The Agreement sets out the procedures for the conduct of heritage surveys when a proponent (government or non-government) is undertaking ground-disturbing activities.

The Heritage of Western Australia Act 1990 (repealed)

In July 2019, the *Heritage of Western Australia Act 1990* (the *HWAA*) was repealed and replaced by *Heritage Act 2018*. Any heritage agreements entered into under Section 29 of the *HWAA* that were in effect on the commencement day of the *Heritage Act 2018* continue to have effect as if it were certified under the new legislation. The municipal heritage inventories that were compiled and maintained under the *HWAA* are still a maintained repository of information for local governments today. Indeed, the collation of local heritage information is still required under Part 8 of the *Heritage Act 2018*, now referred to as Local Heritage Surveys.

Heritage Act 2018

The purpose of the *Heritage Act 2018* (the *HA*) is to recognise and promote Western Australian cultural heritage by defining principles for conservation, use, development or adaptation for heritage places. In repealing the *HWAA*, the *HA* serves as the main legislative framework for historical heritage, sometimes referred to as European heritage, in the State and the main purpose of this Act is to identify, conserve and enhance places which are of cultural heritage significance.

The Act sets out processes for the management of the State Register of Heritage Places, including the establishment of a Heritage Council. The purposes of this Council include the assessment of places of

significance, advising the Minister for Heritage, guiding public authorities on best practice, promoting public awareness and administration of the Register of Heritage Places. The Heritage Council of Western Australia is Western Australia's advisory body on heritage matters and focuses on places, buildings and archaeological sites, with a mission to provide for and encourage the conservation of places significant to the cultural heritage of Western Australia under the jurisdiction of the *HA*.

The *HA* requires the keeping of a Register of Heritage Places for places that are protected by the provisions of the Act. Heritage places generally gain registration under the *HA* by being shown to be of cultural heritage significance or possessing special interest relating to or associated with cultural heritage. Section 38 outlines relevant factors in determining the significance of heritage places. This section uses definitions and values like those of the Burra Charter (see above): The Council are to consider values such as aesthetic, historical, scientific, social or spiritual, and characteristics such as fabric, setting, associations, use and meaning.

Part 5 outlines the responsibilities of public authorities to consider heritage matters within development planning. Under Section 73 of the *HA*, public authorities must refer a development proposal to the Council when the proposed works have potential to impact a registered place. The advice provided by the Council in response to a referred proposal may consider the restoration, maintenance and interpretation of the heritage place in question.

Part 8 introduces the term 'Local Heritage Survey' which is defined as a survey of places that are, or may become, of cultural heritage significance. Section 103 (i) stipulates that local governments must prepare a Local Heritage Survey of places within their district. This survey serves as a public record of places of significance and assists local government in development planning and in the implementation of its local planning scheme.

Part 11 outlines the definitions and penalties for offences and contraventions of the Act. Under section 129 of the *HA*, unauthorised impact to registered heritage places is subject to penalty. Section 129 defines damage as including altering, demolishing, removing or despoiling any part of, or thing in, a registered place. The penalties for contravention of the Act are severe, including a \$1 million fine, imprisonment for one year and a daily penalty of \$50,000. Applications to develop, disturb or alter any place entered on the Register can be made under Part 5 Division 2 of the *HA*. The *HA* is currently administered by the Department of Planning Lands and Heritage in Perth.

The Planning and Development Act 2005

The purposes of the *Planning and Development Act 2005* (the *PDA*) are to consolidate the provisions of the Acts repealed by the *Planning and Development (Consequential and Transitional Provisions) Act 2005* (i.e. the *Metropolitan Region Town Planning Scheme Act 1959*, the *Town Planning and Development Act 1928* and the *Western Australian Planning Commission Act 1985*). The *PDA* is intended to provide for an efficient and effective land use planning system in the State, as well as promoting the sustainable use and development of land in the State.

The *PDA* requires that the advice of the Heritage Council (within the Department of Planning, Lands and Heritage) be sought in cases relating to places listed on the State Register of Heritage Places under the *HA* 2018 section 35(1) or in any local heritage survey prepared under section 103(1) (i.e. a Local Government / Municipal Inventory). In such instances the local government in preparing or amending a local planning scheme is to refer the proposed scheme or amendment to the Heritage Council for advice and is not to proceed without the consent of the Minister for Heritage.

HERITAGE LISTINGS

Historical Heritage Listings

There are several registers and inventories for historical heritage places in Australia. InHerit is an online database for information about heritage places and listings in Western Australia, containing detailed information about cultural heritage places entered in the State Register of Heritage Places, local government inventories and other lists, the Australian Government's heritage list, and other non-government lists and surveys⁶. A summary of the heritage registers and inventories that Fremantle Prison is listed on is provided below.

World Heritage Listing

Fremantle Prison is one of eleven Australian sites that comprise the Australian Convict Sites Serial Listing on the World Heritage List. These sites were inscribed on the World Heritage List by UNESCO on 31 July 2010 in recognition of their significant heritage and representation of the forced migration and penal transportation of prisoners across the world. Fremantle Prison is the most intact convict establishment in Australia. As an international signatory to the *World Heritage Convention* 1972, the State Government (representing the Commonwealth Government as the State Party to the Convention) has agreed to protect and conserve the heritage values of the Prison, and to present these values to the community. The Government is required to report to UNESCO every five years on progress, action and risks for the protection, conservation and presentation of these values. Management of Fremantle Prison is also required to meet the core objectives of the *Australian Convict Sites Strategic Plan 2017-2020*, which seeks to:

- collaboratively manage the values of the nominated Australian Convict Sites;
- conserve and protect the values of the properties for current and future generations;
- present and interpret the values of the properties, emphasising each site's contribution to the whole; and
- give each of the properties a function in the life of the community.

State and National Heritage Listing

Fremantle Prison's heritage significance has also been recognised by its inclusion in the:

- State Register of Heritage Places – Heritage Council of Western Australia (10 January 1992) – Items 1014, 24674 and 3226;
- National Heritage List – Australian Government (1 August 2005) – Item 105762;
- Register of the National Estate – Australian Heritage Commission (March 23, 1978);
- Classified List – The National Trust (WA) (October 3, 1960); and
- Municipal Inventory of Heritage Places – City of Fremantle (February 22, 2000).

Governing Legislation

The ongoing conservation and interpretation of Fremantle Prison's State, National and World Heritage values are governed by the statutory requirements of the Western Australian *Heritage Act* 2018, the Federal *Environment Protection and Biodiversity Conservation Act* 1999, as well as the UNESCO 1972 *World Heritage Convention*.

⁶ <https://www.dplh.wa.gov.au/about-inherit>

SECTION TWO – HISTORICAL BACKGROUND AND CONTEXT

PRISON HISTORY

Fremantle Prison, originally named the Fremantle Convict Establishment, was established as a convict depot by the British government following a decision to transport convicts to Western Australia. It was designed by the first Comptroller-General, Edmund Henderson, and built in the period 1852 to 1859. When the convict system officially ended in Western Australia in 1868, the Prison was taken over by the colonial government and continued to operate as a State prison until its closure in 1991.

The following timeline is summarised from the Fremantle Prison Heritage Management Plan (Extent Heritage Advisors 2019).

The Convict Period (1850–1886)

1849 – The Colony of Western Australia is declared a penal colony.

1850 – The first ship, carrying seventy-five male convicts and fifty pensioner guards and families, arrived in Fremantle. An elevated site for a permanent Convict Establishment was selected.

1851–53 – Construction of the southern wing of the Main Cell Block, Terrace houses and the Warders' Cottages began. East Workshops were constructed.

1854–55 – The Entry Complex – including the Gatehouse, entry court, military and civil guard houses flanking the inner gate – were constructed. Southern wing of Main Cell Block was constructed, and the first convicts were transferred to the site. Perimeter walls were completed.

1857–59 – Guard room, Hospital and carpenter shop were constructed. Northern wing of Main Cell Block was completed.

1859 – Fremantle Convict Establishment was officially opened on 31 December.

1867 – Fremantle Convict Establishment was renamed Fremantle Prison.

1868 – Transportation of convicts to Western Australia officially ceased. Nearly 10,000 convicts were transported to the Colony.

The Colonial / Early State Period (1886–1918)

1886 – Control of Fremantle Prison was transferred to the Western Australian Colonial Government.

1888 – Prisoners were relocated from Perth Gaol to Fremantle Prison. Gallows were built at the Prison, which was by then the only legal place of execution in the Colony. A tunnels system for water supply was constructed.

1889 – Female Division (Women's Prison) was constructed in the northwest of the site.

1898 – A Royal Commission was undertaken into the operation of the penal system.

1900s – The West Workshops were constructed in 1900–1901; alterations were made to the Main Cell Block and Exercise Yards. The New Division with radial exercise yards was constructed in the northeast of the site.

1911 – A Royal Commission into Fremantle Prison saw the implementation of additional reforms.

Post–World War I (1918–present)

1920 – A portion of the Prison was set aside as a reformatory prison.

1940–45 – A part of the Prison was occupied by the Department of Defence during World War II and was returned to civil use after the War.

Post-1945 – A variety of structures were constructed on and below Knoll terraces.

1964 – Eric Edgar Cooke was the last man hanged in Western Australia.

1968 – Prisoners rioted over poor conditions.

1970 – Inmates of Female Prison and staff were transferred to Bandyup Women’s Training Centre, and Female Prison buildings become part of the male prison.

1979 – Fremantle Prison Museum was established.

1988 – A fire occurred during a riot at the Prison.

1991 – Inmates were transferred, and Fremantle Prison was closed as a penal institution.

1992 – Fremantle Prison opened to the public as a museum and cultural attraction.

COMMISSARIAT HISTORY

The Commissariat is a key historical component of Fremantle Prison.

The Convict Period (1850–1886)

1856 – Commissariat construction completed. Ground Floor used as association wards. Basement used by the Steward for storage and had his office as well as a clerk’s office and a morgue.

The Colonial / Early State Period (1886–1918)

1906/07 – ramp outside northern windows backfilled to support the entry into the New Division. The basement offices no longer used. The masonry stairs constructed in the western site and doors installed to provide access to the northern offices from the west.

Post–World War I (1918–present)

1928 – eastern wall open yard filled.

1942 – stairs above Stewards Office covered with timber to make an air raid shelter.

1992 – basement rooms derelict.

Post 1992 – basement rooms partially cleared, and a new steel stairway installed from the forecourt on the ground floor to the basement.

SECTION THREE – ARCHAEOLOGY OF THE PLACE

PAST ARCHAEOLOGICAL WORK

Eureka 2010

In 2010, Eureka Archaeological Research and Consulting UWA (Eureka) conducted small-scale archaeological underfloor excavations in the Steward's and the Clerk's Offices (Eureka Archaeological Research and Consulting 2010).

As part of works associated with repairing the floorboards in the offices, Eureka excavated two keyhole slot areas between intact floorboards (see Figure 4). These were excavated by hand with all deposits sieved.

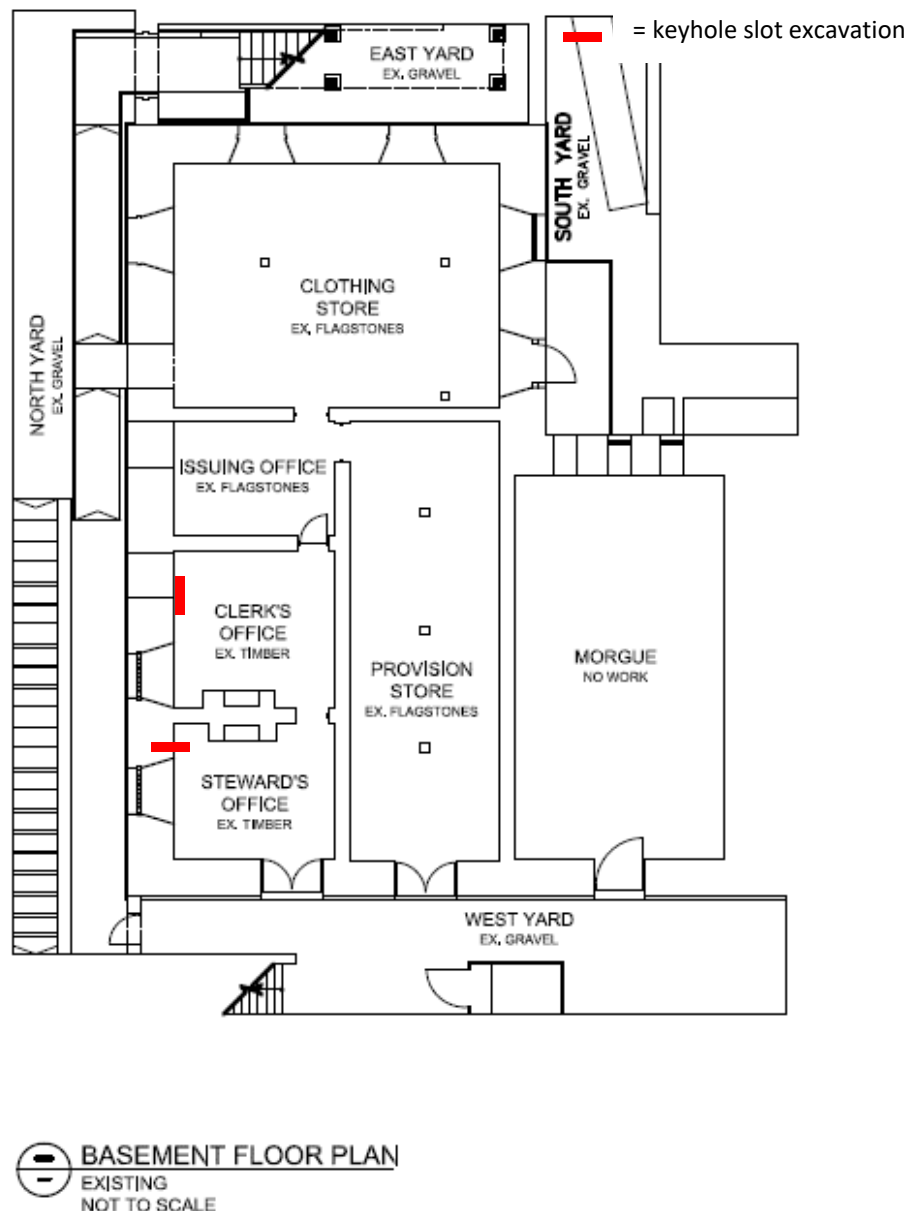


Figure 4. Commissariat basement – approximate location of Eureka (2010) excavations
(Image Source: DPLH)

Steward's Office

The area excavated in this room measured 1.55 m by 0.40 m within a section of two broken floorboards at the room's southern end.

The excavation showed that the deposit is quite limited, with no convict-era finds. The excavation revealed a levelling layer with bedrock reached 100 mm below the surface (see Figure 6). The report concludes that:

Excavation proceeded through a fine, grey, friable sandy silt layer approximately 120mm deep. As well as pieces of broken floorboards, artefactual material recovered from this layer comprised mixed rubbish including modern materials such as brick fragments, plastic conduit, fragments of asbestos and linoleum, lengths of electrical wire and small Styrofoam balls. Metal finds from this layer include lengths of threaded iron pipe, miscellaneous fragments of iron (some perhaps deriving from a broken fireplace), a complete aluminium safety razor and a range of modern screws, nails and tacks. Several possible late 19th century nails were also noted, and are likely to have derived from the broken floorboards. This deposit is essentially modern rubbish that has fallen or was swept into the hole in the steward's office floor after the jarrah floorboards collapsed (Eureka 2010: 6).



Figure 5. Eureka (2010: 5) Steward's Office excavation area (view east)

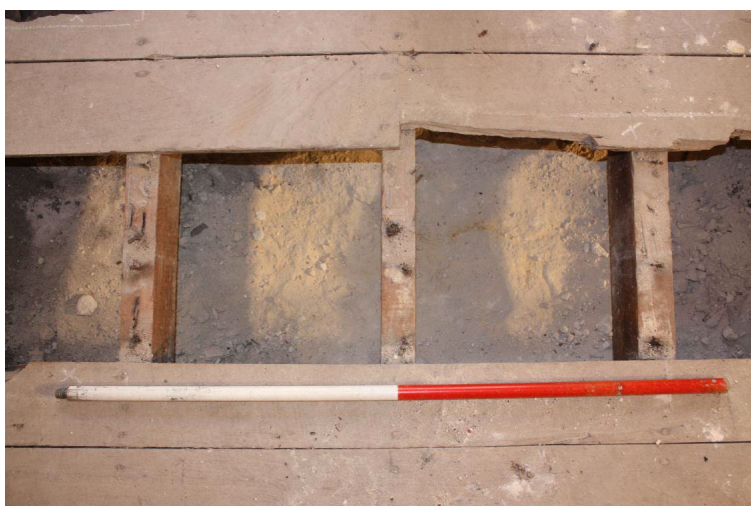


Figure 6. Eureka (2010: 5) Steward's Office top of levelling layer

Clerk's Office

The area excavated in this room measured 0.65 m by 0.50 m within a section of three broken floorboards against the room's southern wall. The deposit in this room was shallower with less finds than in the Steward's Office.



Figure 7. Eureka (2010: 8 and 9) Clerk's Office excavation area start and finish (scale – 1 m)

ARCHAEOLOGICAL POTENTIAL

Only two small areas in the Commissariat offices have been the subject of archaeological investigations, and these were restricted to two locations with broken floorboards. The past archaeological work confirms that there is some potential, albeit limited, for sub-surface archaeological deposits and artefacts beneath the floors in the Commissariat.

Other studies across the Prison indicate that there is archaeological potential in most underfloor, ceiling and recess and sub-surface deposits across the site. Experimental studies and recent excavations of underfloor deposits in Western Australia suggest that sweeping activities tend to shift material to the outer limits of rooms, especially around doorways (Winter et al. 2020). These areas have not yet been fully investigated in the Commissariat basement.

RISK ASSESSMENT

The Fremantle Prison Heritage Management Plan identified the following risks:

- disturbance or destruction of highly significant built form or archaeological features in order to expose archaeological features of lower significance;
- inadvertent disturbance or destruction of the archaeological resource due to lack of prior research or inadequate impacts assessment;
- damage to the archaeological resource because investigations were undertaken by inexperienced or inexpert practitioners;
- failure to make the data generated by archaeological investigation publicly accessible;
- disturbance or destruction of Aboriginal archaeology without appropriate consultation taking place because its significance is not recognised relative to the site's non-Aboriginal heritage values; and
- loss/damage due to an under-resourced collection area and lack of post-excavation analysis.

In addition to these broad themes, the following specific risks associated with works in the Project Area will be addressed in the management strategies of this AMS:

- the limited nature of prior excavation work into the sub-floor deposits.
- That works will involve removing or cleaning out recesses and ramps and other potential deposits.

SECTION FOUR – ARCHAEOLOGICAL SIGNIFICANCE

ARCHAEOLOGICAL SIGNIFICANCE (Bavin 1990)

Zones of Archaeological Sensitivity

Louise Bavin's archaeological zoning plan of the Fremantle Prison compound (Bavin 1990) is essentially what is termed today an Archaeological Management Plan (AMP) for the site (see Figure 8). The purpose of the archaeological zoning plan is to classify sites according to their level of archaeological sensitivity. To assist managers in site development decisions the plan includes basic management recommendations. Areas in which material remains of historical or archaeological research interest are likely to have survived and seem to be highly sensitive to development activities which would disturb sub-surface deposits are allocated the top zoning category to protect them. Conversely, areas which are not likely to contain archaeological remains are given the lowest zoning category (Pearson 1984 quoted in Bavin 1990b).

Zone A: Areas of High Archaeological Sensitivity

Areas zoned A are suspected of containing archaeological remains in the form of building foundations, stores, amenities and services where associated artefacts are likely to be found, thematically and functionally unique structures which are of historical or archaeological research value, and other sites which may be reactivated to reinforce the historical integrity of the Prison. In Zone A areas it is essential that no development activities take place before thorough archaeological investigations have been carried out. If it is found, from test excavations, that a proposed development will threaten a significant archaeological resource, it is strongly recommended that the development be re-designed to avoid that resource.

The basement of the Commissariat has been allocated Zone A classification with Bavin (1990) stating:

The rooms below Division 4 are derelict. They appear to have been used both for storage and accommodation. Results of archaeological investigations in this area are less predictable although they may well prove interesting. The floorboards in the rooms appear to have been in a state of disrepair for some time. Deposits may have been buried beneath or fallen through gaps in the boards. The latter is more likely and such deposits would have consisted of 20th Century artefacts. Other relics have been dumped or stored in the rooms. The questions may be pursued from information obtained from those materials are likely to concern the function of the building, living conditions of officers as opposed to the prisoners, and goods issued to and stored in the prison.

Bavin (1990) recommended that areas classified as Zone A be thoroughly tested and defined before development works are undertaken. Based on archaeological assessment discussed above, feasible options could include:

- salvage any objects that have fallen from the ceilings;
- conduct archaeological excavation around the edges of the floors if the floorboards are being removed;
- inspect any crevices prior to them being cleaned out / altered;
- monitor the removal of any features, both original and modern;
- proceed with development works with monitors in place/on call where any ground disturbance works occur;
- salvage finds; and
- interpret and display finds.

Zone B: Areas of Medium Archaeological Sensitivity

Areas zoned B are suspected of containing archaeological remains of less research potential and significance than those in Zone A sites. Remains may include evidence of minor structures adjoining substantial buildings, artificial landfill, garden plots and less predictable deposits within yards and parade areas. There is still a reasonable chance of locating remains of high research or display value in Zone B areas. Consequently, development works which will disturb subsurface deposits should be preceded by archaeological testing.

Immediate east of the Project Area is the entrance to the Drainage Tunnels that have been classified as Zone B. This part of the Prison is not included in the Project Area.

Zone C: Areas of little or no archaeological sensitivity.

Areas zoned C would appear to have little or no potential for archaeological remains. This conclusion is based on documentary research. Zone C areas were not places of concentrated activity nor were substantial buildings constructed in these areas. A small section of the Project Area is in Zone C to the north of the Commissariat (see Figure 8). Contractors should be briefed on the possibility of uncovering such remains. Should archaeological remains be uncovered during the course of development works it is recommended that contractors cease work until the remains have been inspected and assessed by an archaeologist.

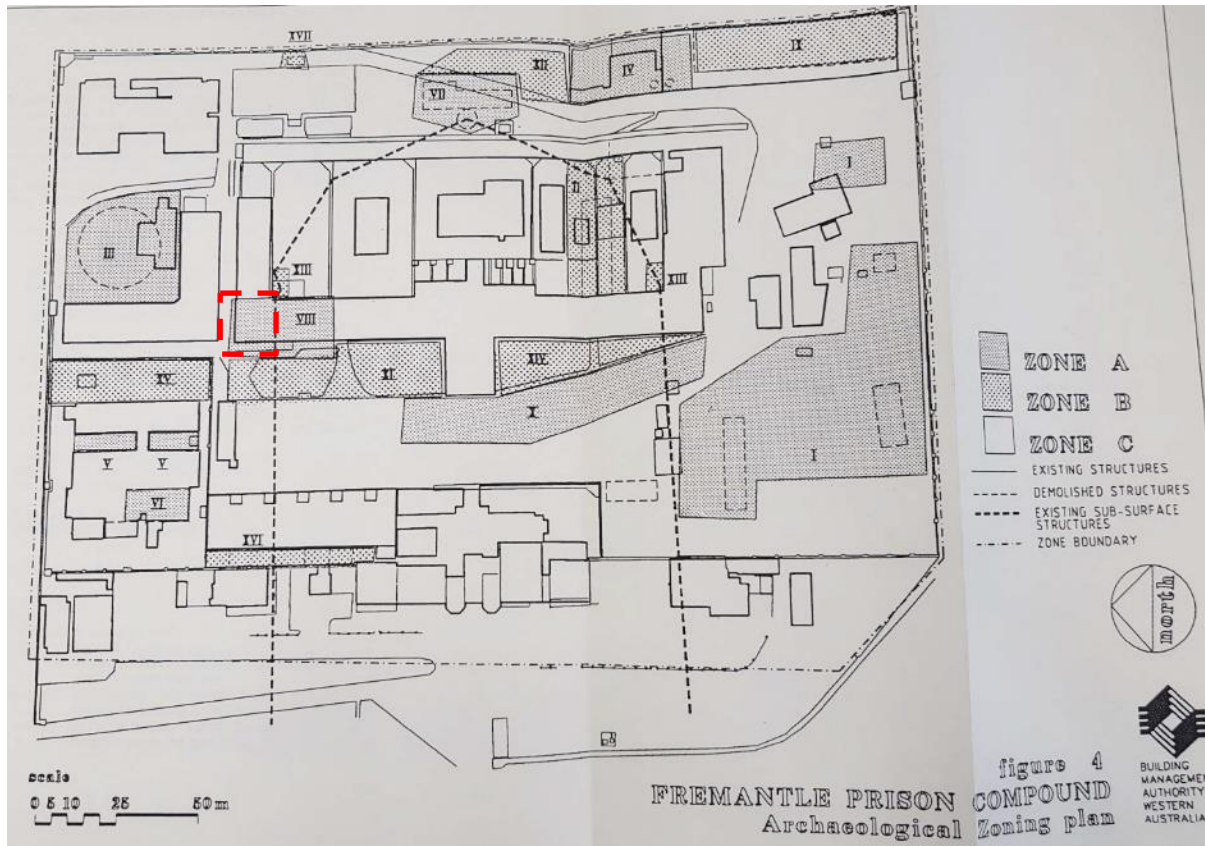


Figure 8. Bavin (1990) Fremantle Prison Compound – Archaeological Zoning Plan (Project Area in red)

ZONES OF SIGNIFICANCE (Extent Heritage Advisors 2019)

The Fremantle Prison Heritage Management Plan (Extent Heritage Advisors 2019) is a comprehensive management and assessment document for the heritage values of the entire Prison compound. The HMP identifies that the Commissariat is a key historical component of the convict-era planning and development of Fremantle Prison. The basement has survived as a largely undeveloped and unembellished space. It has also acted as the significant setting to the Main Cell Block allowing for uninterrupted views of the imposing west façade and Chapel wing. Other views of note from and within the Commissariat include the view of South Knoll, north-south views along the length of the space, views out over the tops of the perimeter walls and Prison buildings, and the axial east-west view between the central entrance to the Chapel wing of the Main Cell Block and Wray Gates (which extends beyond the Commissariat). Of the various paths and roadways, the largest and most prominent, and the one which is evident from the 1850s, runs from north to south, and turns east at the south end of the Main Cell Block. This has historically provided access to the East Workshops which, although important operationally, were otherwise largely isolated from the remainder of the Prison in its early decades.

The Commissariat as part of the Main Cell Block, as defined in the HMP is of exceptional significance (Extent Heritage Advisors 2019: 117). In terms of the Management of

RESEARCH QUESTIONS

Bavin's (1990) archaeological zoning plan notes that the archaeological resource in this part of Fremantle Prison has a high potential of yielding cultural material which may be to address significant research questions:

- structural developments associated with the management of stores and officials working at the Gaol;
- investigation of room functions over time using from investigating in ceiling and under floor investigations;
- exploring the living conditions of officers as opposed to the prisoners; and
- determining the types of goods issued to and stored in the prison through time.

All information collected as part of the AMS could be incorporated into future interpretative signage or exhibits, engaging visitors to the Prison with its archaeology and adding to the site's value as an important historical and cultural tourist attraction. The HMP specifically makes mention of the need to ensure that archaeological investigation results are made available to the public (Extent Heritage Advisors 2019: 49).

SECTION FIVE - ARCHAEOLOGICAL MANAGEMENT STRATEGIES

INTRODUCTION

The exceptional national and international heritage significance of the Fremantle Prison demands that the archaeological values of the place are managed conservatively. The Commissariat Project Area is of high archaeological sensitivity so any risks associated with ground disturbance works must be mitigated.

In the following pages, we will discuss the guiding principles used in the construction of this Management Strategy.

GUIDING PRINCIPLES

The following principles are taken from the Fremantle Prison Heritage Management Plan (Extent Heritage Advisors 2019):

The Opportunities

Where archaeological investigation is necessary at Fremantle Prison this may present an opportunity to involve the community in a program of 'public archaeology' – a form of interpretation.

The archaeological resource at Fremantle Prison comprises a valuable teaching and learning resource. Fremantle Prison may pursue opportunities to collaborate with students and teachers of archaeology from tertiary education institutions.

Archaeological investigation can augment the collection of movable heritage currently curated by Fremantle Prison.

Overarching Policy Framework

POLICY 8

The known and potential archaeological resource at Fremantle Prison will be managed according to its significance. Usually this will comprise its 'scientific significance' (i.e. its ability to address substantive research questions). However, the archaeological resource at Fremantle Prison may also embody other heritage values (e.g. social significance).

POLICY 9

Archaeological excavation at Fremantle Prison will be underpinned by substantive research questions expressed in an Archaeological Research Design prepared by an experienced historical archaeologist prior to works commencing.

POLICY 10

Significant archaeological features will not be damaged or disturbed unless this is necessary for overwhelming research, safety or conservation reasons. Fremantle Prison will seek to retain significant archaeology *in situ*.

POLICY 11

Where the investigation of archaeological features from an earlier period would require the disturbance or destruction of archaeological material from a later period, the decision to proceed will be based on an assessment of the significance of each cultural layer. In some circumstances, the significance of archaeological material from later periods will be higher than that from earlier periods.

POLICY 12

Fremantle Prison will seek to involve the public in programs of archaeological investigation where this can be achieved without compromising the archaeological resource.

POLICY 13

Only historical archaeologists with a demonstrated high level of knowledge and experience will be engaged to investigate Fremantle Prison's archaeological resource (either as part of impact assessment processes or through field work). These archaeologists will also have sufficient training to identify Aboriginal archaeological deposits and artefacts.

POLICY 14

The data generated by archaeological investigation at Fremantle Prison will be made publicly accessible, ideally through publication in a peer-reviewed academic journal but at least as a quality synthesis of the results as requested.

POLICY 15

Once artefacts recovered through archaeological excavation have been documented and analysed such that their research potential has been met, they should from that time be managed according to the 'Moveable Heritage Overarching Policy' contained in this HMP.

OBLIGATIONS

The following section is taken from the Fremantle Prison Heritage Management Plan (Extent Heritage Advisors 2019).

Statutory Framework

The *EPBC Act* governs 'actions' that have, or are likely to have, a significant impact on a matter of 'national environmental significance'. Places on the WHL and NHL (such as Fremantle Prison) are matters of national environmental significance. An 'action' may include a project, a development, an undertaking, an activity or a series of activities. It can include ground disturbance works that might impact the archaeological resource. Before taking an action that could have a significant impact on the heritage values of Fremantle Prison, the action must be 'referred' to the Australian Minister for the Environment and Energy. The Minister will determine whether or not further and more formal assessment and approval is required, i.e. a 'controlled action'.

The Department of Planning, Lands and Heritage has prepared a document entitled 'Section 79(2) Permit Archaeological Excavation Form' for applications to excavate places on the State Heritage Register.

Section 129 of the *Heritage Act 2018* makes it an offence to damage a registered place, including altering, demolishing, removing or despoiling any part of, or thing in, a registered place. The penalties for contravention of the Act are severe, including a \$1 million fine, imprisonment for one year and a daily penalty of \$50,000.

Section 79 of the *Heritage of Western Australia Act 1990* 'damage or despoil' or 'remove any thing from' a place on the SRHP, which can include damage or despoliation of the archaeological resource. However, an application can be made to the Heritage Council for a permit to carry out archaeological works under Section 79 of the Act.

The Western Australian *Aboriginal Heritage Act 1972* governs Aboriginal 'places', which includes archaeological sites (Section 5). If Fremantle Prison encounters Aboriginal archaeology it must notify the WA Registrar of Aboriginal Sites (Department of Planning, Lands and Heritage) (Section 15). It is an offence to excavate an Aboriginal archaeological site without the approval of the Registrar of Aboriginal Sites (Section 16). Such consent will only be given after an assessment is made of the nature and significance of the site (Section 18).

Schedule A, Clause 13B of the City of Fremantle's Local Planning Scheme No. 4 states that where planning approval is granted in respect of a place on the Fremantle Heritage List, the Council may impose a condition on that planning approval which requires an archaeological investigation of the place. The same condition may be imposed where the Council has reasonable evidence to indicate that the place may include 'contents, materials or objects' (which would include archaeological remains) that have aesthetic, historic, scientific, or social significance (see also City of Fremantle Local Planning Policy 2.7). However, the City of Fremantle Local

Planning Scheme No. 4 zones Fremantle Prison as a Regional Reserve. By Section 2.2 of Local Planning Scheme No. 4 Council approval is not required for the commencement or carrying out of any use or development on a Regional Reserve.

Approval is required from the Western Australian Planning Commission (which will include input from the Heritage Council of Western Australia).

Non-Statutory Framework

A Practice Note supplementing the Burra Charter entitled 'The Burra Charter and Archaeological Practice' states that the fundamental principles contained in the Burra Charter apply to archaeological sites. Article 13 of the Burra Charter states: 'Co-existence of cultural values should always be recognised, respected and encouraged.

This is especially important in cases where they conflict.' This will be relevant (a) where archaeological features from the convict era underlie post-convict archaeological features of national, state or local significance, and (b) where they overlie Aboriginal archaeological remains.

The Department of Planning, Lands and Heritage has prepared a document entitled 'Heritage Impact Statement – A Guide'. It includes reference to the assessment of archaeological impacts.

State governments around Australia have produced guideline documents on how to assess the significance of historic archaeological sites. They usually emphasise the research potential of such places assessed having regard to (a) research potential relative to other sites, (b) research potential relative to other sources, and (c) the ability to otherwise address substantive questions about human behaviour.

MANAGEMENT STRATEGY

The proposed upgrade works to the Fremantle Prison Commissariat will address important structural issues and the adaptive reuse of derelict spaces and are considered a necessary part of the site's upkeep and maintenance. Provided that a conservative approach is taken, disturbance to any sub-surface archaeological material will be minimised.

Given the limited nature of the previous archaeological excavations and the assessment by Bavin (1990) for this part of the Gaol, archaeological evaluation trenching / test pitting is considered necessary prior to a number of the works commencing. Each proposed activity has been assessed based on the activity, the archaeological potential of the area and the risk associated with the activity impacting heritage (see Table 3). The range of archaeological management options that will need to be utilised for this project.

- **Watching Brief** – where an on-call archaeologist is available to view finds via email and attend site as necessary. This option requires contractors undertaking any works to attend a heritage induction.
- **Monitoring** – where a trained and experienced historical archaeologist is on site watching and guiding the proposed works to ensure that if cultural heritage is identified that it is immediately dealt with.
- **Archaeological Pre Works Investigation/Excavation** – In areas that have been identified as high archaeological potential then archaeological investigation. excavation, documentation occurs prior to works commencing. This work may result in significant archaeological finds and the need for proposed works to be redesigned.
- **Salvage** – If the proposed works are essential the salvage and curation of finds is part of the management strategy. Salvage may also include more detailed archaeological excavation prior to construction works commencing.
- **Interpretation** – At the conclusion of the work the archaeological reports in consultation with Fremantle Prison discussions will be needed to identify suitable interpretative material.

Place	Activity	Risk	Action
Works Area 1: Ground Floor, New Division Alleyway and Walkway	Removal of bitumen and concrete vault capping	Low	Watching Brief
Works Area 2: Basement, North Yard	Stabilisation of ramp and conservation of timber treads	Moderate	Monitoring
	Installation of new sub-surface infrastructure (e.g. Soak-wells and breathing strips)	High	Archaeological Pre Works Investigation/Excavation
Work Area 3: Ground Floor & Basement, Special Handling Unit	Removal of later concrete and steel stairs	Moderate	Monitoring
	Installation of a new accessibility platform lift (and service pit below)	High	Archaeological Pre Works Investigation/Excavation
Works Area 4: Ground Floor & Basement, 4 Division Yard and South Yard	Stabilisation of rubble wall and clean-up	Moderate	Monitoring
	Archaeological Pre Works Investigation/Excavation	High	Archaeological Pre Works Investigation/Excavation
Works Areas 5, 6 & 7: Basement, Issuing Office, Clerks Office, Stewards Office, Clothing Store, Provision Store	Refurbishment of ceilings	High	Archaeological Pre Works Investigation/Excavation
	Refurbishment of original floorboards, flagstones and replacement of damaged floor joists in the former offices	High	Archaeological Pre Works Investigation/Excavation
	Refurbishment of windows, doors and other fixtures	Moderate	Monitoring
Work Area 8: Basement, West Yard	Installation of new sub-surface infrastructure (e.g. Soak-wells and breathing strips)	High	Archaeological Pre Works Investigation/Excavation

Table 3. Management Strategy and Risk Assessment

Further the following statements underwrite the recommendations provided in the next section of this AMS.

- All contractors working on the project should be made aware of the heritage significance of the Project Area and understand their obligations under the relevant heritage legislation. This may be achieved by running a heritage-specific induction and providing the team with access to this AMS, along with the guiding Procedures (see Table 4).

- The Recommendations provided in the following Section and the Procedures provided in Appendices (see Table 4) set out the workflows necessary to fulfil obligations and best practice principles.
- A number of areas will require archaeological excavation prior to works commencing to assess the significance of the archaeological deposits and to provide guidance on the proposed works and its impact to that heritage.
- Monitoring of all ground disturbing works by a suitably qualified and experienced historical archaeologist is considered necessary across the Project Area as there is a high likelihood of sub-surface archaeological material being present.
- All historical loose finds that are discovered during the works should be appropriately recorded, salvaged and stored.
- Given the exceptional significance of the archaeological resource, the outcomes of the archaeological monitoring should be appropriately documented in a detailed report and, where possible, used for interpretation within the Prison Compound.

Appendix	Contents
One	Archaeological Monitoring Procedure
Two	Archaeological Discovery Procedure
Three	Find Recording and Collection Procedures
Four	Contractor Procedure Handout

Table 4. Appendices for Management Procedures

SECTION SIX – RECOMMENDATIONS

RECOMMENDATIONS

To ensure best-practice management of the archaeological resource of the Fremantle Prison Commissariat, it is **recommended** that:

- the removal of bitumen and concrete vault capping in Works Area 1: Ground Floor, New Division Alleyway and Walkway is of low risk to archaeological heritage and that the management strategy should be a Watching Brief.
- The stabilisation of ramp and conservation of timber treads in the Works Area 2: Basement, North Yard is of moderate risk to archaeological heritage and that the management strategy should be monitoring.
- The removal of later concrete and steel stairs in the Work Area 3: Ground Floor & Basement, Special Handling Unit is of moderate risk to archaeological heritage and that the management strategy should be monitoring.
- The installation of a new accessibility platform lift (and service pit below) in the Work Area 3: Ground Floor & Basement, Special Handling Unit is of high risk to archaeological heritage and that the management strategy should be archaeological pre works investigation / excavation.
- The stabilisation of rubble wall and clean-up in the Work Area 4: Ground Floor & Basement, 4 Division Yard and South Yard is of moderate risk to archaeological heritage and that the management strategy should be monitoring.
- The refurbishment of ceilings in the Works Areas 5. 6 & 7: Basement, Issuing Office, Clerks Office, Stewards Office, Clothing Store, Provision Store is of high risk to archaeological heritage and that the management strategy should be archaeological pre-works investigation / excavation.
- The refurbishment of original floorboards, flagstones and replacement of damaged floor joists in the former offices in the B Works Areas 5. 6 & 7: Basement, Issuing Office, Clerks Office, Stewards Office, Clothing Store, Provision Store is of high risk to archaeological heritage and that the management strategy should be archaeological pre-works investigation / excavation.
- The refurbishment of windows, doors and other fixtures in the Works Areas 5. 6 & 7: Basement, Issuing Office, Clerks Office, Stewards Office, Clothing Store, Provision Store is of moderate risk to archaeological heritage and that the management strategy should be monitoring.
- The installation of new sub-surface infrastructure (e.g. Soak-wells and breathing strips) in the Work Area 8: Basement, West Yard is of high risk to archaeological heritage and that the management strategy should be archaeological pre-works investigation / excavation.
- All contractors working on site should undertake a heritage-specific induction, to be produced by the archaeologist, to introduce them to the heritage values and potential sub-surface archaeology of the Project Area.
- All contractors working on site should be given access to this AMS and provided with copies of the Archaeological Monitoring Procedure (Appendix 1), Archaeological Discovery Procedure (Appendix Two) and Contractor Procedure Handout (Appendix Four).
- The works program should be prepared to allow for alterations and or amendments if required.
- The works program should be prepared to allow time for the archaeologist to assess and record any archaeological features or artefacts that may be encountered during the works; and
- on completion of the works the archaeologist should draft a report on the conduct of the archaeological monitoring for submission to the DPLH. The report should include:
 - background archaeology and history of the site and surrounding area;
 - methods;

- personnel and qualifications;
- descriptions of archaeological features and finds;
- significance assessments;
- detailed site plans, stratigraphic sequences and photographs of the work, archaeological features and finds;
- conclusions and a discussion of the identified archaeological material in terms of the research questions; and
- guidance for the interpretation of the results and any display or safe keeping of the archaeological material recovered during the development.

REFERENCES

- Australian ICOMOS. 2013. "The Burra Charter and Indigenous Cultural Heritage Management." Melbourne.
- Bavin, L. 1990. "Fremantle Prison Conservation and Future Use. Archaeological Zoning Plan of the Prison Compound. Version 2."
- Burra Charter. 2013. "The Australia ICOMOS Charter for Places of Cultural Significance 2013." Burwood.
- Department of Planning Lands and Heritage. 2019. "Draft Fremantle Prison Master Plan 2019-2029."
- Eureka Archaeological Research and Consulting. 2010. "Archaeological Assessment of the Sub- Floor Potential, Commissariat Building, Fremantle Prison, Western Australia." Perth.
- Extent Heritage Advisors. 2019. "Fremantle Prison. Heritage Management Plan."
- Haast, Alyce, Kate Robertson, Philippa Hunter, and Varteny Boyadjian. 2013. "Fremantle Prison Parade Ground Excavation Report. Masters of Professional Archaeology, UWA."
- Heritage Council of Western Australia. 2019. "Archaeological Management Strategies."
- Pearson, M. 1984. "Report of an Investigation into the Historical Archaeological Resources of the Arthur Head Area, Fremantle. Centre for Prehistory, University of Western Australia."
- Wilson, M. 2019. "Report of Archaeological Monitoring, Trenching for Fire Services, Fremantle Prison. Department of Planning, Lands and Heritage File Note."
- Winter, Sean, Jessica Green, Katie Benfield-Constable, B'geella Romano, and Meg Drummond-Wilson. 2020. "Investigating Underfloor and Between Floor Deposits in Standing Buildings in Colonial Australia." *International Journal of Historical Archaeology*. <https://doi.org/10.1007/s10761-020-00551-x>.

APPENDIX ONE – ARCHAEOLOGICAL MONITORING PROCEDURE

During all ground disturbing works within the Project Area the following should be undertaken:

- 1) The Project archaeologist is provided with sufficient scope to closely monitor works.
- 2) It is the responsibility of the Department of Planning, Lands and Heritage (DPLH) and / or the contractor in charge of the project to ensure that the Project archaeologist is briefed and provided with at least two (2) days notice of commencement of any ground disturbing works.
- 3) The DPLH / contractor should provide the Project archaeologist with accurate maps and, where possible, digital GIS location information of the areas of proposed ground disturbance.
- 4) Continued monitoring of the works will occur at the discretion of the Project archaeologist. In certain instances / situations the archaeologist may decide that their on-site attendance is not required. In such instances if archaeological finds or features are identified during the works then the Archaeological Discovery Procedure should be followed.
- 5) The Project Archaeologist should be contacted immediately in the event of archaeological finds or features and works should cease as per the Archaeological Discovery Procedure in Appendix Two.
- 6) The Project Archaeologist has the right to stop works to sufficiently analyse any identified archaeology as per the Archaeological Discovery Procedure in Appendix Two.
- 7) Once all ground disturbing works are completed the Project archaeologist shall draft a detailed report for submission to the DPLH.

APPENDIX TWO – ARCHAEOLOGICAL DISCOVERY PROCEDURE

- 1) Contractors should familiarise themselves with this Archaeological Management Strategy and be aware of the significant archaeological potential of the Project Area.
- 2) The Department of Planning, Lands and Heritage is the primary custodian of any archaeological finds and features that may be encountered during the works.
- 3) The contractor's works program shall be sufficiently flexible to allow for the implementation of the following Archaeological Discovery Procedure across the Project Area.
- 4) A variety of archaeological material may be encountered during ground disturbing works, including but not limited to:
 - a) flaked and ground Aboriginal stone artefacts (Plate 1 and Plate 2);
 - b) historical artefacts including, but not limited to:
 - glass from bottles or window panes;
 - ceramics from pottery, tobacco pipes etc.
 - metal items such as fastenings (nails) etc. (Plate 3 to Plate 5); and
 - historical building footings or surfaces, these may be of stone or brick (Plate 6 to Plate 10).



Plate 1. Aboriginal flaked artefact (quartz)



Plate 2. Aboriginal ground-edge axe (dolerite)



Plate 3. 19th Century pottery sherds



Plate 4. Clay tobacco pipes



Plate 5. Historical clear glass bottle



Plate 6. Historical brick



Plate 7. Hand forged nail



Plate 8. Buttons



Plate 9. Historical limestone wall footings



Plate 10. Historical brick surface



Plate 11. 19th Century well and drain

PROCEDURE FOR THE DISCOVERY OF ABORIGINAL ARTEFACTS

Aboriginal cultural material may be identified during the works, which may include Aboriginal artefacts such as stone, or less commonly, wooden or bone tools.

Surface Finds

Should surface Aboriginal artefacts or cultural material be found during works, the following procedures should be implemented:

- 1) all works in the immediate vicinity of the find must cease and the project archaeologist should be notified immediately (if not on site);
- 2) the find should not be removed or disturbed further, and barriers or temporary fences may be erected around the area if required;
- 3) the project archaeologist will create accurate records, including GPS coordinates and photographs of the archaeological material, including an *in situ* evaluation of the find;
- 4) work may be permitted to continue at an agreed upon distance from the find;
- 5) a written statement of the archaeologist's assessment and recommendations will be provided to the DPLH for their consideration; and
- 6) based on the recommendations of the archaeologist, decisions regarding the treatment of the find shall be made in consultation with the archaeologist, Whadjuk Noongar Traditional Owners and the DPLH.

Sub-Surface Material / Sites

In the event that Aboriginal cultural material is found in a sub-surface context, the following should occur:

- 1) all works in the immediate vicinity of the find must cease and the project archaeologist should be notified immediately (if not on site);
- 2) the find should not be removed or disturbed further, and barriers or temporary fences may be erected around the area if required; and
- 3) an archaeological assessment should be arranged with the consent and involvement of Whadjuk Noongar Traditional Owners, through the South West Aboriginal Land and Sea Council.

PROCEDURE FOR THE DISCOVERY OF HISTORICAL FEATURES/FINDS

- 1) If historical features / finds are encountered during the works, they should not be moved, and works should be halted immediately in the immediate vicinity of the find and the Project Archaeologist notified.
 - a) If the Project Archaeologist is not present, they should be informed at once. Depending on the nature of the find and discussion with the Project Archaeologist, work may be permitted to continue at an agreed upon distance from the find.
 - b) Once the archaeologist is present, they may decide to undertake further hand excavation / cleaning around the cultural material to assess its size / extent and determine its provenance and potential cultural significance.
 - c) At this stage, if considered necessary, the archaeologist will inform the Department of Planning, Lands and Heritage (DPLH) of the cultural material.
 - d) If the cultural material is assessed by the archaeologist as not in its primary context, at the discretion of the archaeologist, works may proceed with caution and with direction from the archaeologist after the cultural material has been recorded, bagged and removed from the work area.
 - e) In the unlikely event that the historical cultural material is assessed by the project archaeologist as a significant historical *in-situ* feature, in consultation with the DPLH, options for the recording, preservation or salvage of the feature will be determined. This may involve further archaeological excavation to determine the precise nature and extent of the feature.
 - f) After recording, all salvaged finds will be recovered by the archaeologist, bagged and removed from work area.

- g) The Archae-aus Finds Management Process should be followed for appropriate storage or use of these finds.

PROCEDURE FOR THE DISCOVERY OF HUMAN REMAINS

- 1) There is the possibility that human remains could be found during the project works.
- 2) Should human remains be found during works, the following legislation becomes applicable:
 - a) *Coroners Act 1996* – all human remains;
 - b) *Aboriginal Heritage Act 1972* – Aboriginal remains; and
 - c) *Commonwealth Aboriginal and Torres Strait Islander Heritage Protection Act 1984* - Aboriginal remains.
- 3) Should human remains be found during works, the following procedures should be implemented:
 - a) all works must cease immediately, and personnel must comply with the instructions of the project archaeologist. The remains should not be removed or disturbed further, and barriers or temporary fences may be erected around the area if required;
 - b) the Fremantle Prison authorities and DPLH should be notified immediately;
 - c) under section 17 of the *Coroners Act 1996* the local police and Coroner’s office must be notified;
 - d) if the human remains are thought to be Aboriginal then the Registrar of Aboriginal Sites at the DLPH must be informed. The Registrar of Aboriginal Sites will inform the Federal Minister for Aboriginal Affairs; and
 - e) in consultation with the police, Coroner and DPLH, steps to identify the remains must be taken. This may necessitate engaging a physical anthropologist to complete this task on site.
- 4) If the human remains are determined to be of Aboriginal (or undetermined) origin:
 - a) Traditional Owners should be consulted as to the management of the remains;
 - b) no further work at the location should be undertaken until all parties have been consulted and an agreement has been reached. Once an agreement has been reached, works may continue at an agreed distance away from the human remains; and
 - c) if left *in situ*, the location of the remains should be recorded in sufficient detail for their future protection.
- 5) If the human remains are determined to be of Aboriginal (or undetermined) origin, and *in situ* preservation is not a practical solution, provided all parties agree to the relocation of the remains:
 - a) approval to disturb the remains under section 18 of the *Aboriginal Heritage Act (AHA)*, and/or a permit to excavate the remains for archaeological purposes under section 16 of the *AHA* should be sought;
 - b) an archaeological excavation plan should be developed and implemented in consultation with the Traditional Owners and the DPLH; and
 - c) provision be made for the return of the remains to the Traditional Owners for their repatriation at a safe location.
- 6) If the human remains are non-Aboriginal and are of a historical nature and cannot be avoided:
 - a) The Heritage Council of Western Australia and the Western Australian Museum will be consulted regarding the proposed disturbance.
 - b) A data recovery programme, planned in consultation with DPLH / Western Australian Museum and a historical archaeologist and osteoarchaeologist, may be developed and implemented.
 - c) The curation / collection of any excavated remains will be discussed between the Fremantle Prison and DPLH.

APPENDIX THREE – FIND RECORDING AND COLLECTION PROCEDURES

LOOSE FIND RECORDING PROCESS

- 1) Find is photographed *in situ*
- 2) Location of find recorded on site plan
- 3) Loose Find recording form completed
- 4) Find placed into a storage bag using the correct conservation collection technique
- 5) Find labelled with find number, location, collectors name and date collected
- 6) Finds stored in durable plastic tubs (see Plate 12)
- 7) Data entered into a digital database



Plate 12. Storage tubs



Plate 13. Storage tubs

FEATURE RECORDING PROCESS

- 1) Feature is photographed
- 2) Location of feature recorded on site plan
- 3) Feature recording form completed
- 4) Data collated on completion of works
- 5) Depending on the type of feature, in consultation with DPLH specific procedures will be required to either preserve *in situ* or remove and conserve.

COLLECTION PROTOCOLS

Careful collection of finds is required and if finds conservation is required, conservators at the Western Australian Museum need to be consulted immediately.

- 1) Any finds recovered from a waterlogged context need to be kept wet in the same water from which they were collected.
- 2) Organic finds should be wrapped and kept away from direct sunlight, then stored at between 4° – 5° C.
- 3) Glass, ceramics, brick and stone should be carefully collected, dry brushed and stored separately in labelled plastic bags.
- 4) Metal items should be carefully collected, dry brushed and stored separately in labelled plastic bags. If metals are recovered from a wet environment they need to be stored wet. Fresh water is preferable to salt water except for lead and lead alloys, such as pewter. Only store like metals in the same container. Retain any adherent concretions. Do not store metals in the same container as organic materials unless they are part of an inseparable, composite object.

STORAGE PROCESS

Once initial recording and reporting on finds is complete, all cultural material should be handed over to the DPLH for appropriate long-term management and storage. Copies of all databases, recordings and analysis should also be provided to the DPLH.

APPENDIX FOUR – CONTRACTOR PROCEDURE HANDOUT

PROCEDURE - ARCHAEOLOGICAL FINDS DISCOVERY

Archaeological potential occurs across the entire Project Area, this procedure should be followed if suspected archaeological material is uncovered and the archaeologist is not present.

During ground disturbing works⁷ the following must occur if objects such as the following are found:

- 1) Historical artefacts such as bricks, concrete, dressed stone blocks, timber, road surfaces, bottles, ceramics, metal and bone**
- 2) Aboriginal artefacts including flaked stone and glass, shell, animal bone and metal, ground stone tools**

Action	Process	Personnel	When
1. Stop Work Immediately	The discoverer will notify machine operators working in the vicinity to stop work to avoid further disturbance of the structure or object. Do not move or touch the found item.	Discoverer	Immediately upon discovery of any object
2. Notify the Site Supervisor and the Managing Contractor	Discoverer informs the Site Supervisor. The Site Supervisor informs the Managing Contractor.	Discoverer, Site Supervisor	Immediately
3. Protect the Find	If possible, fence off the affected area with as large a buffer as possible to protect the find. Keep all work away from the area until it has been assessed by the Archaeologist.	Site Supervisor	ASAP
4. Document	Take at least two photographs (using mobile phones) of the find with something for scale (pens, hands, ruler, people)	Site Supervisor	ASAP
5. Notify the Archaeologist	The Managing Contractor contacts the Archaeologist to advise of the find. The Managing Contractor emails the photographs to the Archaeologist and provides details of where the find is located (including depth, if possible).	Managing Contractor	ASAP
6. Initial Assessment of the Find	The Archaeologist views the photographs and advises the Managing Contractor on whether a site visit is required.	Project Archaeologist	ASAP but within 24 hours to minimise delays

⁷ These are defined as any activity that disturbs the ground surface. It can include activities such as topsoil clearing, grubbing, geotechnical testing, grading, cutting, trenching, potholing pits, deep excavation and directional drilling (launch and retrieval pits).

7. On-Site Assessment of the Find	If a site visit is required, the Managing Contractor will notify the Site Owner. The Archaeologist assesses the find and in consultation with the Managing Contractor will arrange the recording of the objects and possible salvage.	Managing Contractor, Project Archaeologist	ASAP
8. Recording / Salvage	The Archaeologist to follow the Project Archaeological Management Plan.	Archaeologist	ASAP
9. Clearance	Once salvage is complete the Archaeologist informs the Managing Contractor that the area is clear. Archaeologist informs the Managing Contractor if additional conditions for continued work are required.	Archaeologist	Following assessment
10. Resume Work	Managing Contractor informs the Site Supervisor.	Managing Contractor	ASAP

APPENDIX FIVE – REFERENCE MATERIAL

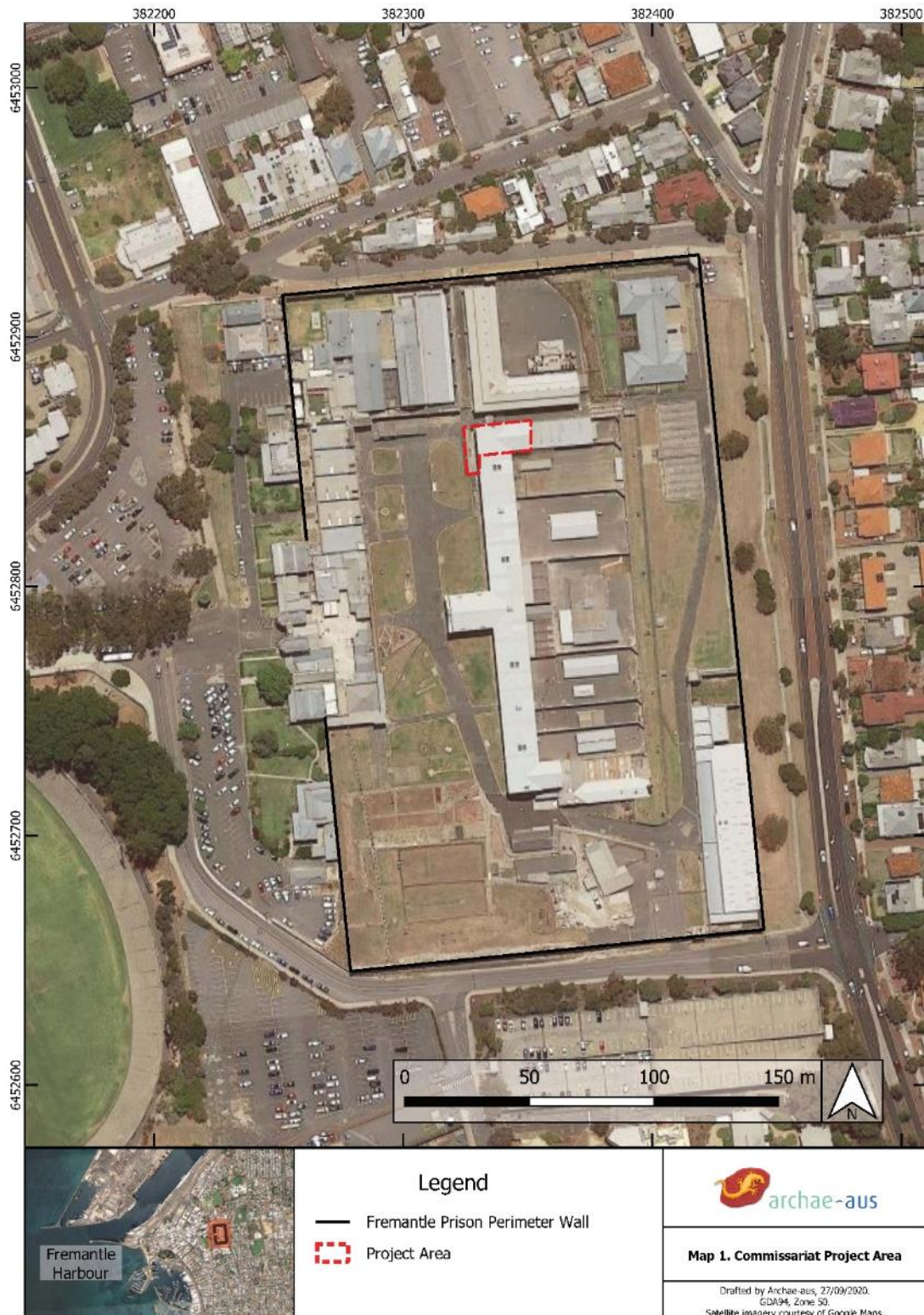


Figure 9. Project Area map

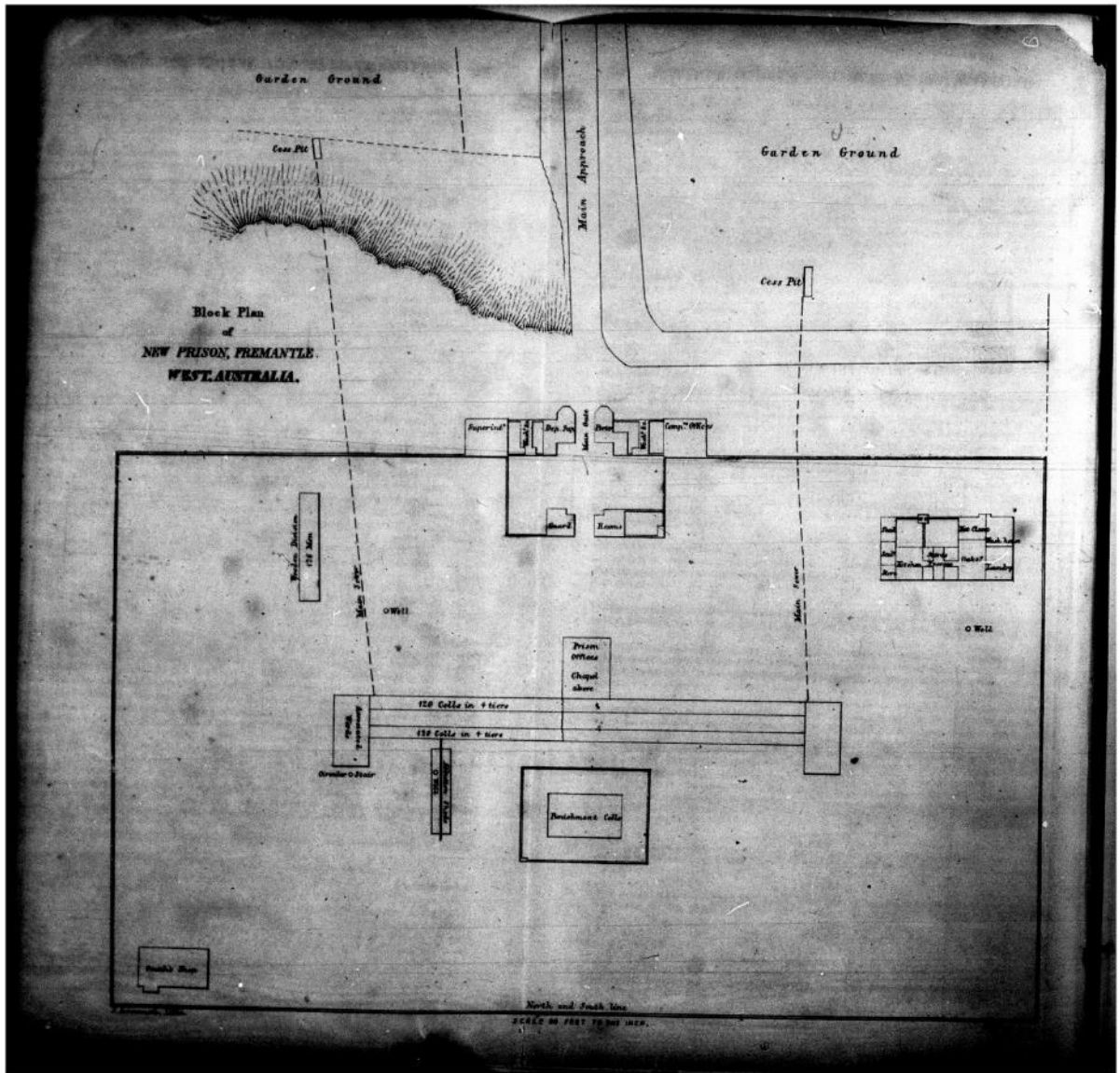


Figure 10. 1856 Block Plan

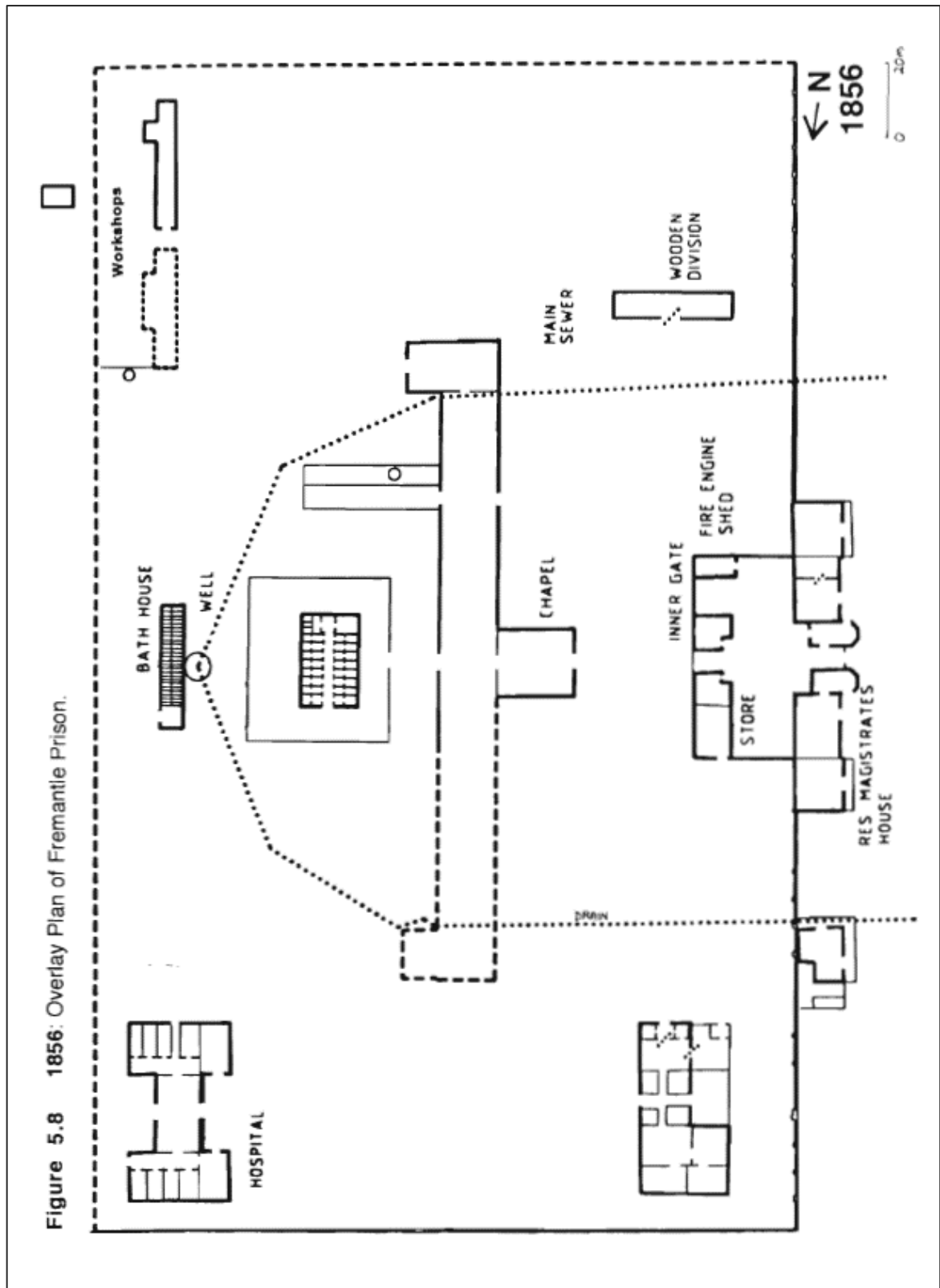


Figure 11. 1856 Plan as per Bavin 1990b, Figure 5.8

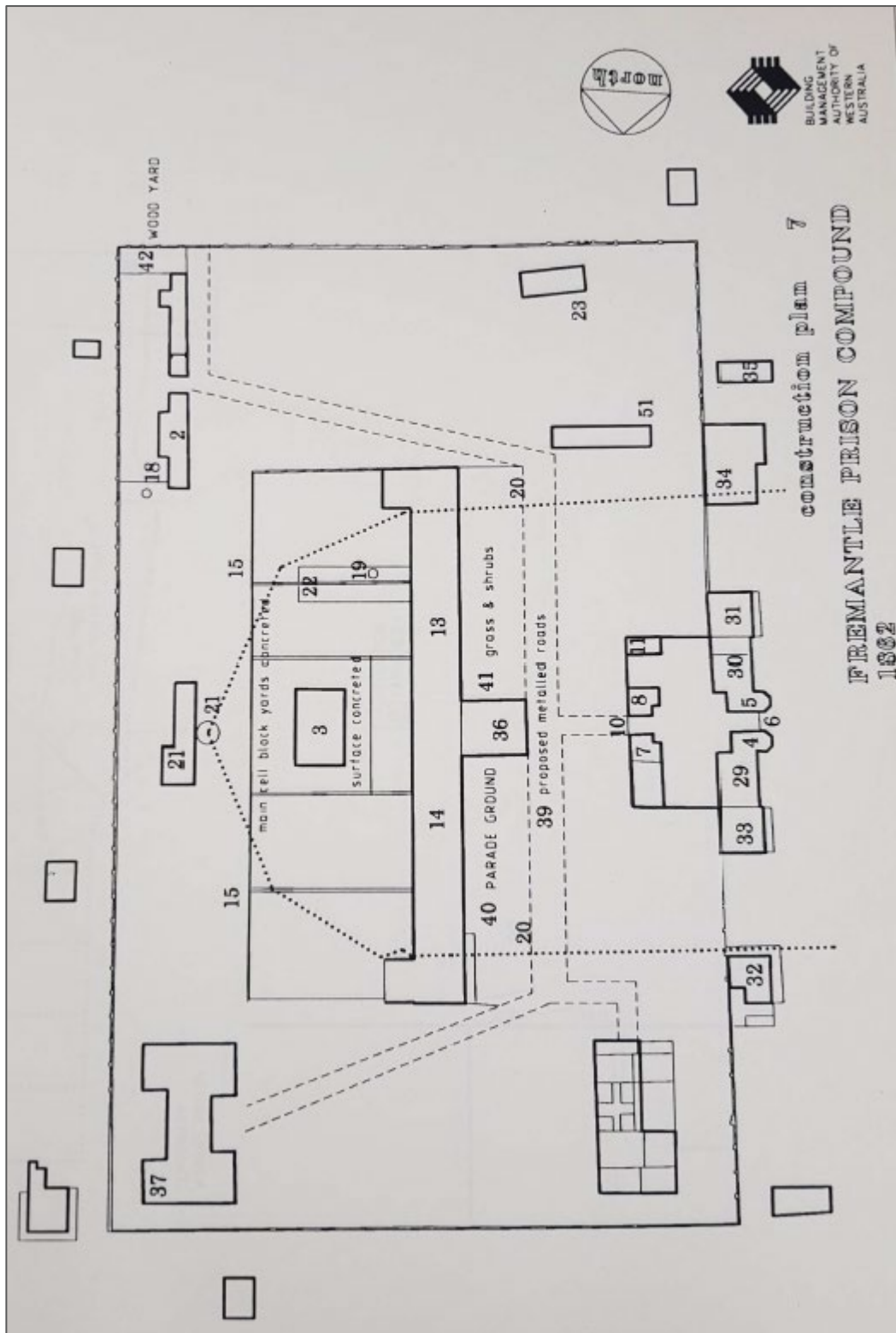


Figure 12. 1862 Construction Plan as per Bavin 1990b

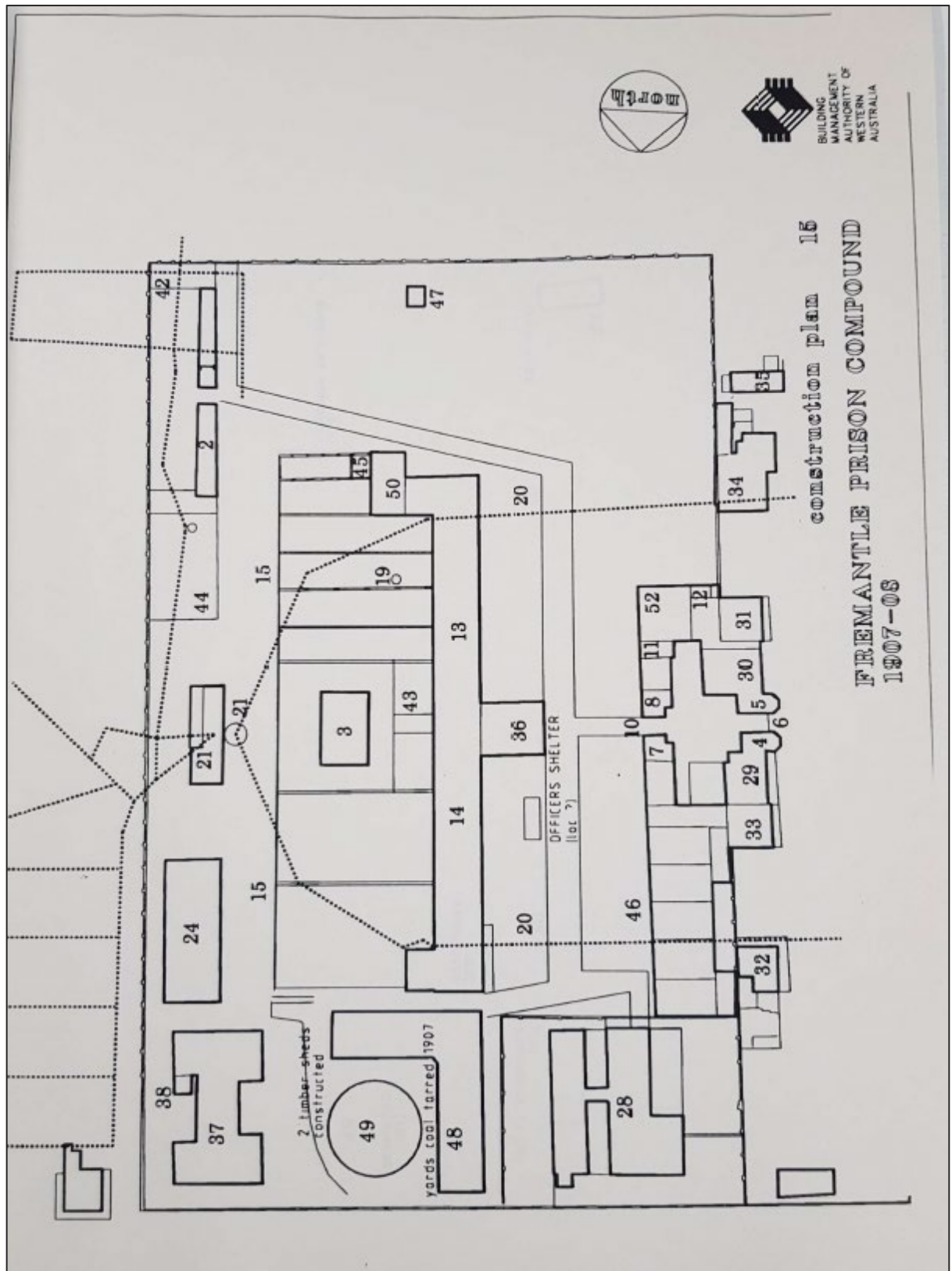


Figure 13. 1907 – 1908 Construction Plan as per Bavin 1990b

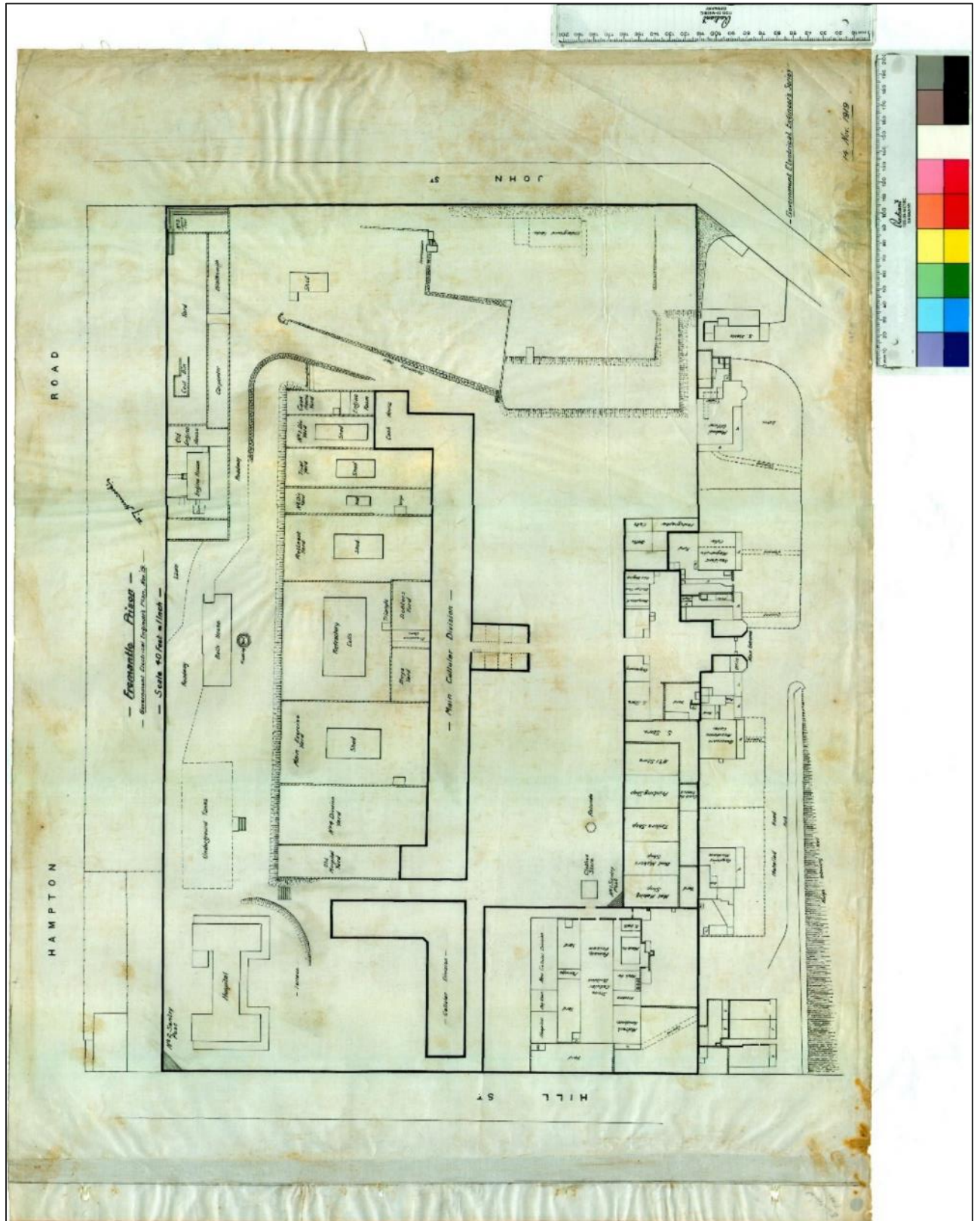


Figure 14. 1919 Electrical Engineer's Plan

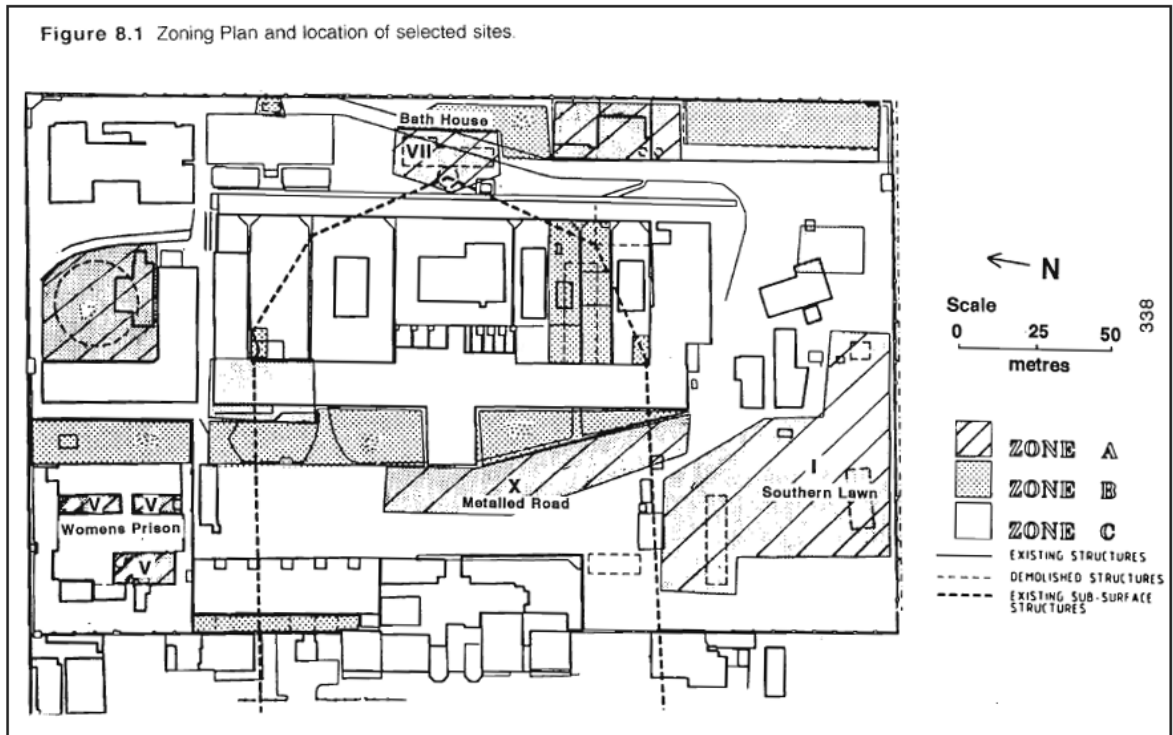


Figure 16. Zoning Plan – Bavin 1990b

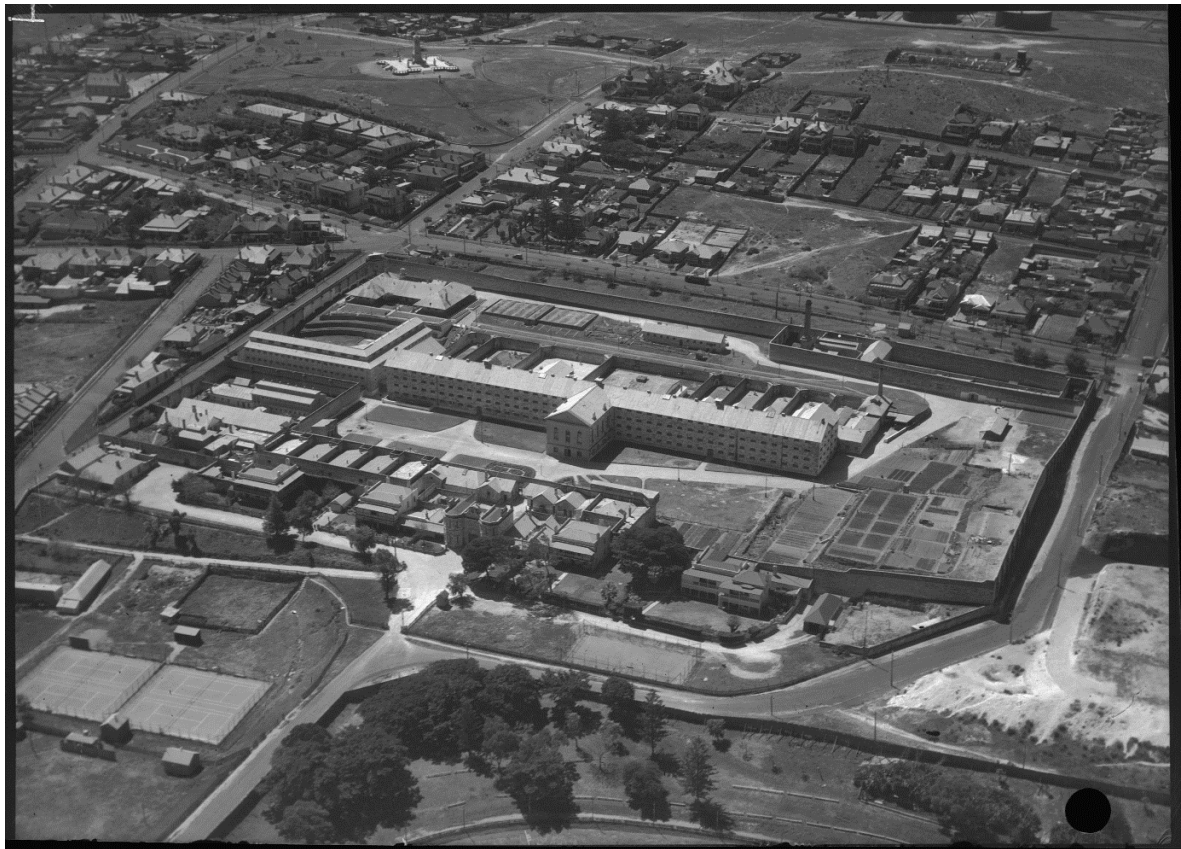


Figure 17. 1935 Aerial Imagery (SLWA Call No 031598PD)



Figure 18. 1948 Aerial Imagery

APPENDIX SIX – SCOPE OF WORK TECHNICAL DRAWINGS