

Project Number: HN001460-A



ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT – 2 & 2A BULLECOURT AVENUE, MILPERRA

REVISED DRAFT 9/03/2026

REPORT TO: MIRVAC RESIDENTIAL (NSW) DEVELOPMENTS PTY LTD
Level 28, 200 George Street Sydney NSW 2000 Australia

REPORT BY HERITAGE NOW PTY LTD
projects@heritagenow.com.au
0460 744 466
www.heritagenow.com.au

Executive Summary

This Aboriginal Cultural Heritage Assessment report is submitted to the Department of Planning, Housing and Infrastructure (the Department) on behalf of Mirvac Residential (NSW) Pty Ltd (the Applicant) in support of a State Significant Development Application (SSDA) for a staged residential development at 2 and 2A Bullecourt Avenue (the site).

An archaeological survey of the Project Area was undertaken by Jenna Weston of Heritage Now and Justine Coplin of Darug Custodian Aboriginal Corporation on 13 August 2025. No Aboriginal objects or areas of potential archaeological deposit were found, and the majority of the Project Area has been extensively disturbed. As such, the archaeological sensitivity is assessed to be low and no Aboriginal heritage impacts are anticipated from the proposed works.

The Project Area is assessed to be of low historic, archaeological and aesthetic significance, and moderate cultural significance.

Heritage Now makes the following recommendations.

Recommendation 1

All on-site personnel are to be made aware of their obligations under the *National Parks and Wildlife Act 1974*, which includes protection of Aboriginal sites and the reporting of any new, or suspected, Aboriginal heritage sites. This may be done through an on-site induction or other suitable format.

Recommendation 2

In the unlikely event that Aboriginal or suspected Aboriginal archaeological material is uncovered during the development, then works in that area are to stop and the area cordoned off. The Project Manager is to contact the Heritage Consultant to make an assessment as to whether the material is classed as Aboriginal object/s under the *National Parks and Wildlife Act 1974* and advise on the required management and mitigation measures. Works are not to re-commence in the cordoned off area until heritage clearance has been given and/or the required management and mitigation measures have been implemented.

Recommendation 3

In the unlikely event that human remains, or suspected human remains are uncovered during the development, then works in that area are to stop and the area cordoned off. The Project Manager is to contact the NSW Police to establish whether the area is a crime scene. If it is not a crime scene, and the remains are determined to be Aboriginal ancestral remains, then Heritage NSW is to be notified via the Environment Line on 131555 and management measures are to be devised in consultation with RAPs. Works are not to recommence in the area until the management measures have been implemented.

Acronyms and Definitions

Acronym/Term	Definition
Aboriginal object	Aboriginal object means any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains (as per <i>NPW Act 1974</i>).
Aboriginal place	Any place declared to be an Aboriginal place under Section 84 of the <i>NPW Act</i> .
AHD	Australian Height Datum
AHIMS	Aboriginal Heritage Information Management System (register for Aboriginal sites in NSW)
AHIP	Aboriginal Heritage Impact Permit (as per <i>NPW Act 1974</i>)
A Horizon	The top layer of mineral soil in a soil profile. It is usually broken into A ₁ and A ₂ soils, with the former tending to have a relatively high dark organic content, while the latter is paler.
B Horizon	The B horizon underlies the A horizon of a soil profile, and is generally a high-clay content soil.
DCP	Development Control Plan
DCS	NSW Department of Customer Service
DECCW	Department of Environment, Climate Change and Water, NSW (became the Office of Environment and Heritage in 2011, a role now assumed by Heritage NSW).
DP	Deposited Plan
EP&A Act	Environmental Planning and Assessment Act (1979)
LALC	Local Aboriginal Land Council (Land Council under the Aboriginal Land Rights Act 1983)
LGA	Local Government Area
m	Metric metres
Non-perennial	In terms of waterways, it means a waterway that is usually partially or fully dry for part of the year.
NPW Act	National Parks and Wildlife Act 1974
OEH	Office of Environment and Heritage, NSW (Now Heritage NSW)
PAD	Potential Archaeological Deposit

Acronym/Term	Definition
Perennial	In terms of waterway, it means a waterway that has year-round water.
RAPs	Registered Aboriginal Parties (Aboriginal organisations and individuals who were consulted for the Project following Aboriginal Cultural Heritage Consultation Requirements for Proponents)
SCP	Spatial Collaboration Portal for delivery of NSW spatial datasets provided by DCS Spatial Services.
SSDA	State Significant Development Application
WSU	Western Sydney University

Version Control

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6	Revised draft addressing Heritage NSW comments	Jenna Weston, Heritage Now, Principal Heritage Consultant	9/03/2026	Jenna Weston, Heritage Now, Principal Heritage Consultant	9/03/2026

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1 Introduction

This Aboriginal Cultural Heritage Assessment report is submitted to the Department of Planning, Housing and Infrastructure (the Department) on behalf of Mirvac Residential (NSW) Pty Ltd (the Applicant) in support of a State Significant Development Application (SSDA) for a staged residential development at 2 and 2A Bullecourt Avenue (the site).

The key objectives of this assessment are to identify cultural heritage values through consultation with Registered Aboriginal Parties (RAPs), and provide recommendations to manage and protect Aboriginal objects and values identified during the assessment.

1.1 Project Area

The site is currently owned by Western Sydney University and is located within the Canterbury Bankstown LGA at 2 and 2A Bullecourt Avenue, Milperra, being legally described as Lot 2 in DP1291984 and Lot 1 in DP101147 ((Figure 1, Figure 2).

The total site has an area of approximately 19.64ha and is the subject of numerous easements affecting the site, including two easements to drain water, easements for electricity and other purposes, and a right of carriageway.

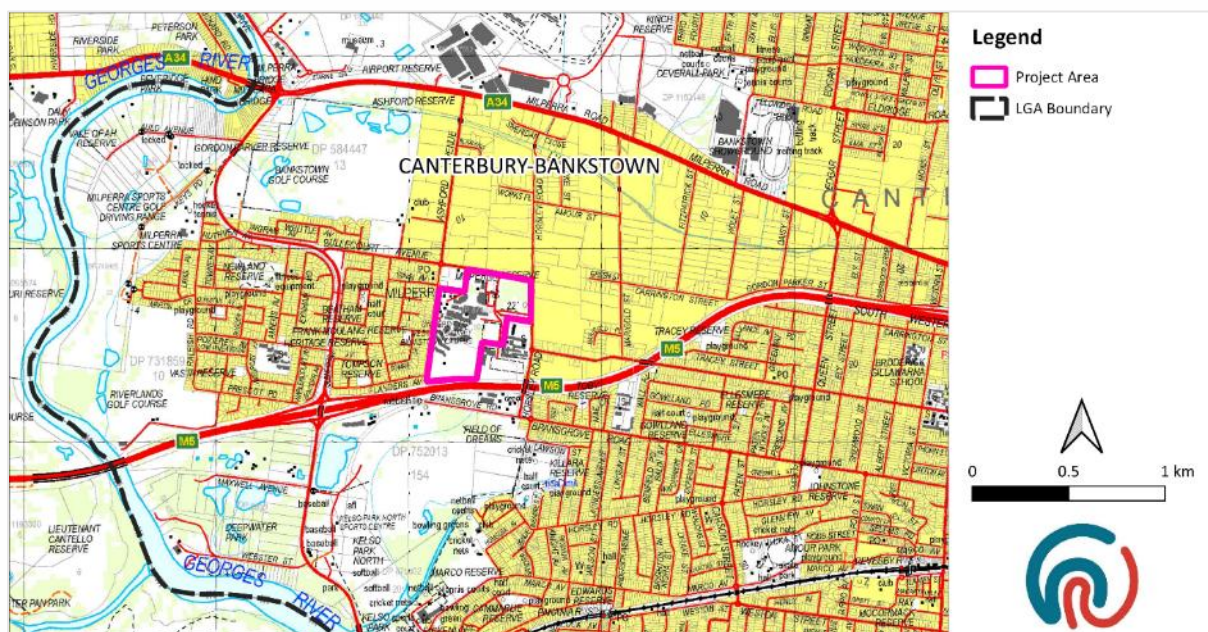


Figure 1. The Project Area in a regional context. (Source: SCP with Heritage Now additions)

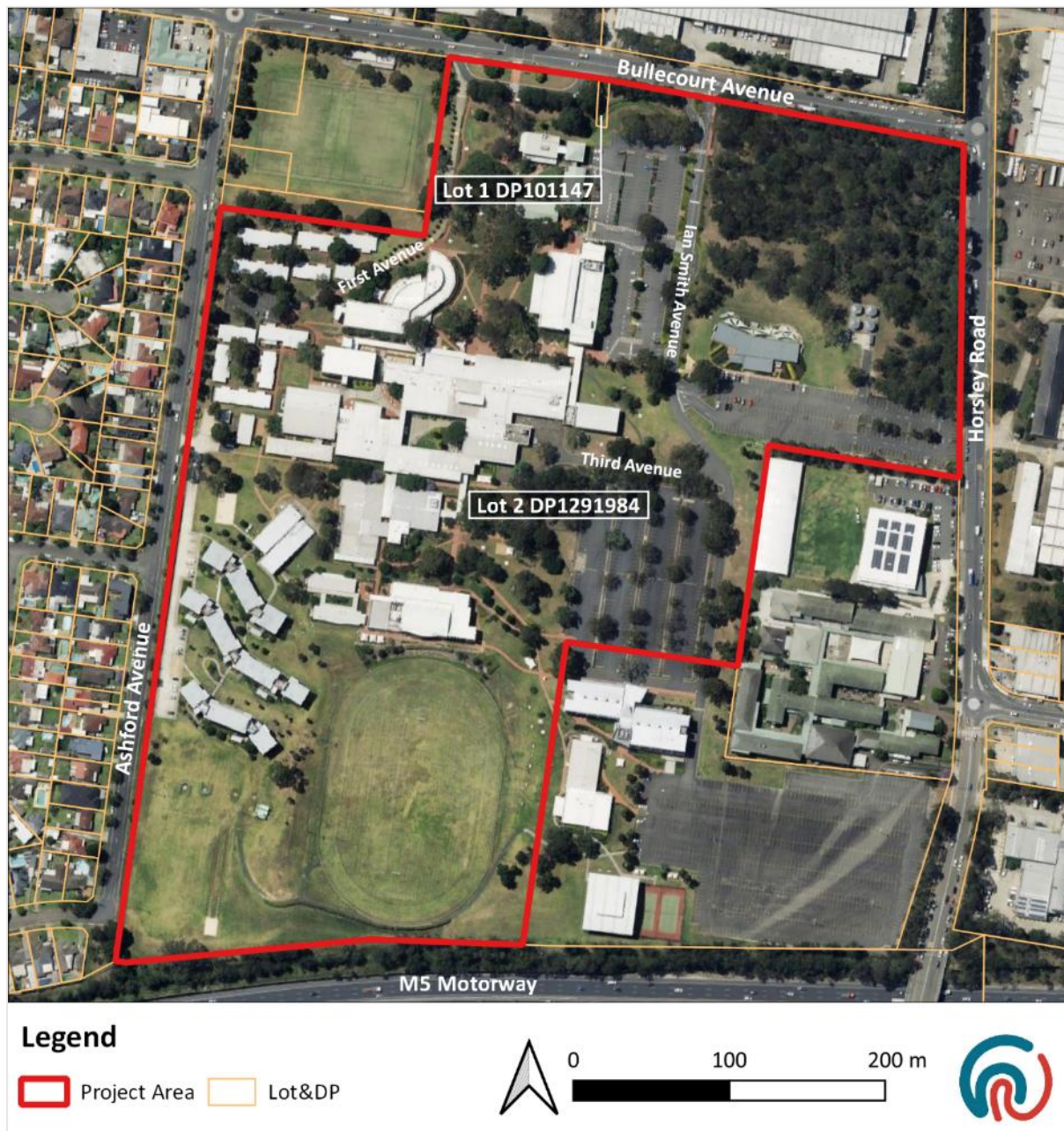


Figure 2. The Project Area. (Source: SCP with Heritage Now additions)

Since the demolition of the previous buildings on the site, the site currently comprises:

- Existing at-grade car park (within Zone 4) repurposed as parking and hardstand area for the temporary sales office.
- Existing at-grade car park for the Childcare Centre (generally within the location of the future Road 2B).
- At-grade roads off Bullecourt Avenue.
- A large oval to the south.
- The Western Sydney University Early Learning Centre (Child-care centre).
- Vegetation of varying significance, including Cumberland Plain Woodland.

The site is bound by the M5 Motorway to the south, Ashford Avenue / existing residential dwellings to the west, Bullecourt Avenue / existing industrial development to the north, and Horsley Road / existing industrial development to the east. Adjoining the site along the southeastern boundary is Mount St Joseph Catholic College.

A substantial number of bus stops are located along Bullecourt Avenue and Horsley Road, servicing routes that connect passengers both within and beyond the LGA, including direct links to Bankstown Central (approximately 8.5km drive from the site), Westfield Burwood, and Westfield Miranda. While the nearest train line is the T8, accessible via East Hills, Panania, and Revesby stations, the T6 line at Bankstown Station can also be reached via bus services operating near the site.

1.2 Relevant SEARs

This Aboriginal Cultural Heritage Assessment Report (ACHAR) addresses the following relevant Secretary's Environmental Assessment Requirements (SEARs) set out in Table 1 below.

Table 1. SEARs Compliance Table.

SEARs Request	Response
21. Aboriginal Cultural Heritage Where there is known, or reasonably likely, to be Aboriginal cultural heritage on or near the site demonstrate that impacts have been adequately investigated and assessed by: - Identifying that an appropriate prior planning process has already considered these impacts, e.g. a rezoning or development application, or - Providing an initial assessment of the potential impacts. If potential impacts are significant, provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) which: - Identifies, describes and assesses any impacts to Aboriginal cultural heritage sites or values associated with the site. - Is prepared in accordance with relevant guidelines.	Aboriginal Cultural Heritage Assessment Report

1.2.1 Heritage NSW Comments

Heritage NSW provided comments on the SSDA, responses to which are provided in

Table 2. Heritage NSW comments and responses.

Comments by Heritage NSW	Heritage Now Response
Further information is required on the potential for intact A-horizon across sections of the project area. While the ACHAR outlines that much of the project area has been subject to large scale ground disturbance, the geotechnical report (Appendix AA of the EIS) indicates that areas in the southeast retain varying depths of topsoil. Please provide further discussion on if these areas may contain archaeological deposit and, if so, additional archaeological assessment may be required (i.e., test excavations).	As shown in Figure 10 and Plate 8 of the ACHAR, the south-east part of the Project Area has been subject to large-scale ground disturbance for the development of a sports oval. This seems to have involved some excavation of topsoil in the central area, and deposition of this excavated material to create the mounded outer ring around the oval. Subsequently, topsoil may have built up in the central area from modern run-

	off/erosion of the outer mounds. Further, the Project Area is located at a distance from fresh water (250m north of a non-perennial 1st order stream and 1.7km east of the estuarine Georges River), As such, it is considered unlikely that any substantial or intact archaeological deposits will be present within the Project Area, and thus no areas of PAD were identified.
In support of the EIS, a due diligence assessment (Appendix LL) was supplied for additional assessment of the childcare carpark works. Heritage NSW does not review due diligence assessments as they are a legal defence against harm under section 87 of the National Parks and Wildlife Act 1974 (NPW Act). As the regulator under the NPW Act, Heritage NSW can be called upon on to participate in non-compliance investigations under the Act, including strict liability offences for which due diligence is used as a defence. Heritage NSW recommends that Appendix LL is made an Addendum to the ACHAR and it provided to the Registered Aboriginal Parties (RAPs) for review and comment.	This due diligence assessment is being sent to the RAPs as an addendum to the ACHAR (Appendix 3), for their review and comment.

1.3 Project Methodology

This ACHA report was prepared in accordance with, but not limited to, the *National Parks and Wildlife Act 1974* (NPW Act), the *National Parks and Wildlife Regulation 2019* (NPW Regulation), the *Environmental Planning and Assessment Act 1979* (EP&A Act), Canterbury Bankstown Local Environmental Plan (LEP), and the State Environmental Planning Policies (SEPPs). The following guidelines and codes of practice have been used in preparing this ACHA report:

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

In accordance with the guidelines this report has:

- outlined the Project Area and proposed activity (project proposal) (Section 1.2 and 7.1)
- outlined the Aboriginal consultation process (Section 3 and Appendix 1),
- provided relevant background information (Section 4.1 and 4.2),
- undertaken an assessment of cultural heritage values (Section 6),
- undertaken an impact assessment, including consideration of avoidance and/or mitigating harm (Section 7), and
- provided recommendations (Section 8).

1.4 Overview of Project Proposal

The project will be delivered in stages and across two separate SSDA Projects, and comprises the construction of approximately 385 dwellings, three (3) public parks, new roads and shared paths, civil infrastructure, a car park, and the management of conservation land.

Specifically, across the two SSDAs, consent is sought for:

- Tree removal
- Site remediation (excluding works carried out as category 2 remediation works)
- Construction of bulk earthworks, public roads and landscaping, and services
- Augmentation of existing services and road infrastructure
- Construction of three (3) public parks
- Construction of 385 dwelling houses
- Construction of a carpark to service the existing childcare centre and E1 Local Centre zoned land
- Subdivision resulting in 385 residential lots, infrastructure lots, and the creation of a community title lot for land zoned C2 Environmental Conservation and E1 Local Centre
- Conservation works including the management of >2Ha Cumberland Plain Woodland Species.

This SSDA comprises of all Civil works across the entirety of the site as well as the construction of all 62 dwellings in Stages 1 and 2 only, which are as follows:

- Stage 1 – Commencement of site-wide tree removal and land remediation, creation of two (2) super lots and total of 22 residential lots, and construction of 22 dwelling houses fronting Ashford Avenue. This will be the first stage to be delivered and will connect into the existing infrastructure that located within Ashford Avenue.
- Stage 2 – Creation of four (4) super lots, a new lot (Lot 25) across the RE1 Public Recreation zoned land, and 40 residential lots. This stage also involves the construction of 40 dwellings within Stage 2, and the construction of new roads and the new public park referred to in the Civil Plans as the 'Central Park'.
- Stage 3a – Creation of a new super lot, and the construction of perimeter roads surrounding the existing childcare centre, construction of a new car park to service the childcare centre and C2 Environmental Conservation zoned land. It is proposed all associated civil works required to enable the operation of the existing childcare centre will be delivered under this stage. The new traffic intersections at both Bullecourt Avenue and Horsley Road will be constructed.
- Stage 3b – Creation of three (3) lots to be delivered under a Community Title Scheme for the E1 Local Centre zoned land.
- Stage 4 – Creation of eight (8) super lots, a new lot (Lot 50) across the RE1 Public Recreation zoned land, and a new lot (Lot 49) across the SP2 Infrastructure zoned land. This stage also involves the construction of new roads, the stormwater infrastructure Basin 1 and Basin 2, and the new public park referred to in the Civil Plans as the 'Southern Park', all to be dedicated to Council.
- Stage 5 – Creation of six (6) super lots and construction of new roads and civil works.
- Stage 6 – Creation of nine (9) super lots and a new lot (70) across the RE1 Public Recreation zoned land. This stage also involves the construction of new roads and civil works, and the new public park referred to in the Civil Plans as the 'Northern Park', all to be dedicated to Council.
- Stage 7 – Creation of six (6) super lots and construction of road and civil works.

The second SSDA will seek consent for all outstanding works in stages 3 to 7, which are as follows:

- Stage 3 – Construction of the Childcare Alterations and Additions and Construction of a permanent structure for Commercial use.

- Stage 4 – Creation of the subsequent subdivision into 107 residential lots and construction of dwellings.
- Stage 5 – Creation of the subsequent subdivision into 65 residential lots and construction of dwellings.
- Stage 6 – Creation of the subsequent subdivision into 92 residential lots and construction of dwellings.
- Stage 7 – Creation of the subsequent subdivision into 59 residential lots and construction of dwellings.

1.5 Authorship, Copyright and Restricted Information

This report was produced by the Heritage Now team. The report was written by Tiffany Jones (Heritage Consultant), Kirrily White (Heritage Consultant) and Jenna Weston (Principal Heritage Consultant), with input from Jacqueline Chua (Heritage Officer). Technical input and quality review was provided by Kylie McDonald (Senior Heritage Consultant) and Tessa Boer-Mah (Principal Heritage Consultant). Heritage Now Pty Ltd retains the copyright of this report.

There is no restricted information associated with this report and no confidential information (other than RAPs who do not want their details released).

2 Legislative Context

This section provides an outline of the Acts, Regulations and guidelines under which this assessment was undertaken. It is for information purposes only and should not be taken as legal advice.

2.1 Native Title Act 1993 (Cth)

The *Native Title Act 1993* recognises and protects the native title rights and interests of Aboriginal people and Torres Strait Islanders. The Act established the National Native Title Tribunal as an independent body to administer native title claims. It also authorises the making and registration of Indigenous Land Use Agreements about the use and management of land or waters.

A search of the National Native Title Tribunal registers of native title information was undertaken on 24 March 2025. There are no relevant entries for the Project Area on the Register of Native Title Claims, National Native Title Register, or Register of Indigenous Land Use Agreements.

2.2 Aboriginal Land Rights Act 1983 (NSW)

This Act provides land rights to Aboriginal people through the Local Aboriginal Land Councils. It details a process for claiming unused Crown land in NSW and for enabling land use. It also allows for agreements to permit traditional hunting, fishing and gathering. The Office of the Registrar, *Aboriginal Land Rights Act 1983* (NSW) (ORALRA), registers land claims and maintains the Register of Aboriginal Land Claims and Register of Aboriginal Owners.

No part of the Project Area is Crown land and no claim against the land under this Act can be made.

2.3 National Parks and Wildlife Act 1974 (NSW)

The NPW Act contains provisions for protecting Aboriginal objects and declared Aboriginal places in NSW. An Aboriginal object is defined as:

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

An Aboriginal place is an area of land that “is or was of special significance with respect to Aboriginal culture”, and is recognised by a declaration published in the Government Gazette by the Minister for Environment and Heritage.

Under Section 86 of the NPW Act, it is an offence to harm (destroy, deface or damage) or desecrate an Aboriginal object or an Aboriginal Place. The definition of harm includes moving an object from the land on which it is situated. The NPW Act sets out tiered strict liability offences and penalties for harming or desecrating Aboriginal objects or places.

Under Section 87, there are certain defences to the offence of harm. These include that harm was carried out under an Aboriginal Heritage Impact Permit (AHIP); that due diligence was exercised to determine if an action would harm an Aboriginal object; or that the activity was prescribed as a low impact act in the NPW Regulation.

The Aboriginal Heritage Information Management System (AHIMS) holds information about Aboriginal sites (Aboriginal objects and declared Aboriginal Places) in NSW. Under Section 89A, the location of an Aboriginal object must be reported to Heritage NSW within a reasonable time, unless it has previously been identified and a record submitted to AHIMS.

2.3.1 National Parks and Wildlife Regulation 2019

The National Parks and Wildlife Regulation 2019 (NPW Regulation) provides a framework for exercising due diligence and identifies codes of practice to determine whether an activity is likely to cause harm to Aboriginal objects (Section 57), as well as specifically defines certain low impact activities (Section 58). Compliance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010c) or other industry specific code adopted under the NPW Regulation constitutes a defence against prosecution if an Aboriginal object is unknowingly harmed without an Aboriginal Heritage Impact Permit.

The NPW Regulation also outlines requirements for Aboriginal consultation (Section 60) and matters to be dealt with in an Aboriginal cultural heritage assessment report (Section 61), to be submitted with an Aboriginal Heritage Impact Permit application.

2.4 Environmental Planning and Assessment Act 1979 (NSW)

The EP&A Act provides triggers for undertaking environmental and heritage assessments as part of the wider land-use planning framework. Part 4 details how authorities are to determine development applications, as well as identifying whether projects require an Environmental Impact Statement. Part 9 outlines the implementation and enforcement of the EP&A Act.

The EP&A Act also allows for the making of environmental planning instruments: SEPPs that deal with matters of state or regional planning significance, and LEPs for the purpose of planning within a local government area.

2.4.1 State Environmental Planning Policy (Housing) 2021

There are no specific Aboriginal cultural heritage policies or requirements in relation to the Project Area within the SEPP.

2.4.2 Canterbury Bankstown LEP 2023

The *Canterbury Bankstown LEP 2023* requires development consent to demolish, disturb, excavate or develop land on which an Aboriginal object is located or that is within an Aboriginal place of significance. Council must consider the effect of a proposal on an Aboriginal Place and any Aboriginal object located within an area of works. Council must inform the local Aboriginal community about the application where impacts to Aboriginal cultural heritage may occur. Protected heritage under the LEP is listed in Schedule 5.

There are no Aboriginal objects or places of significance within the Project Area listed on Schedule 5 of the LEP.

2.4.3 Canterbury Bankstown Development Control Plan (2023)

The Canterbury Bankstown 2023 (amended 2024) Development Control Plan (DCP) supplements the Canterbury Bankstown LEP and contains more detailed provisions to guide development. Chapter 11.13 sets out the general provisions related to the Former WSU Campus, Milperra. Section 3.9 addresses Aboriginal cultural heritage within the area and lists the following conditions:

- An Aboriginal Cultural Heritage Assessment (ACHA) is required before any ground disturbing works commence, for any subdivisions or developments on land adjacent to or containing C2 Environmental Conservation Zone.
- An Unexpected Find Protocol is required prior to any works (remediation, earthwork, or construction) within lands identified in the Heritage Interpretation Map.

3 Aboriginal Consultation

This section documents the Aboriginal Consultation that was undertaken for the project in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (OEH, formerly DECCW 2010b) and will be referred to as the 'Aboriginal Consultation Requirements'. The four stages of Aboriginal consultation were undertaken, and additional documentation is available in Appendix 1.

3.1 Stage 1

In accordance with Stage 1 of the Aboriginal Consultation Requirements, requests for information on the names of Aboriginal people who hold knowledge relevant to determining the cultural significance of any Aboriginal objects and/or places in the Project Area were sent to:

- Heritage NSW, Department of Planning and Environment,
- Gandangara Local Aboriginal Land Council,
- the Registrar appointed under the *Aboriginal Land Rights Act 1983*,
- Canterbury Bankstown Council,
- National Native Title Tribunal,
- NTSCORP Limited, and
- Greater Sydney Local Land Services.

The National Native Title Tribunal has undertaken steps to remove itself from the formal list of sources for information about Aboriginal knowledge holders. Information on native title claims, native title determinations and Indigenous Land Use Agreements is available by searching the Tribunal registers (Section 2.1).

Based on information provided by these agencies, Aboriginal people identified as potential knowledge holders were notified of the proposed project on 2 May 2025, and invited to register an expression of interest in the community consultation process.

A public notice providing a description of the proposed project and inviting expressions of interest from the Aboriginal community was also placed in the *Koori Mail* on 21 May 2025.

Following the project notifications and publication of the public notice, 16 Aboriginal people and organisations nominated to become RAPs for the Project (Table 3).

Table 3. List of RAPs consulted for the Project.

Representative	Organisation
Carolyn Hickey	A1 Indigenous Services
Amanda Hickey	Amanda Hickey Cultural Services
Jennifer Beale	Butucarbin Aboriginal Corporation
Confidential RAP	Confidential RAP
Justine Coplin	Darug Custodian Aboriginal Corporation
Paul Boyd	Didge Ngunawal Clan
Daliah Aggrey-Fynn	Gandangara Local Aboriginal Land Council
Wendy Morgan	Guntawang Aboriginal Resources Incorporated
Phil Khan	Kamilaroi Yankuntjatjara Working Group

Representative	Organisation
Ethan Trewlynn	Long Gully Cultural Services
Lee Carroll	Meryhuiela
Darleen Johnson-Carroll	Murra Bidgee Mullangari Aboriginal Corporation
Kaarina Slater	Ngambaa Cultural Connections
Lynette Hartley	Turtle Dreaming
Philip Boney	Wailwan Aboriginal Group
Kathleen Steward Kinchela	Yinarr Cultural Services

3.2 Stages 2 and 3

In accordance with Stages 2 and 3 of the consultation process, details of the project and the assessment methodology was sent out to the RAPs and opportunities for feedback were provided (Table 4).

Table 4. Responses to assessment methodology and project information by RAPs.

Representative	Organisation	Date	Comment
Paul Boyd	Didge Ngunawal Clan	3/07/2025	Email – Agreed with the methodology
Ethan Trewlynn	Long Gully Cultural Services	4/07/2025	Email – Agreed with the methodology
Lee Carroll	Meryhuiela	15/07/2025	Email – Agreed with the methodology
Wendy Morgan	Guntawang Aboriginal Resources Incorporated	16/07/2025	Email – Supported the survey methodology
Amanda Hickey	Amanda Hickey Cultural Services	20/07/2025	Email – Supported the methodology
Darleen Johnson-Carroll	Murra Bidgee Mullangari Aboriginal Corporation	22/07/2025	Email – Endorsed the methodology
Phil Khan	Kamilaroi Yankuntjatjara Working Group	1/08/2025	Email – Identified that the study area is significant and sensitive to their people. Agreed and supported the methodology

3.2.1 Archaeological Survey

An archaeological survey of the Project Area was undertaken on 13 August 2025, attended by Justine Coplin (Darug Custodian Aboriginal Corporation). Opportunities for feedback were also provided during the fieldwork (Table 5).

Table 5. Information provided by RAPs during the survey.

Organisation	Representative	Date	Information Provided
Justine Coplin	Darug Custodian Aboriginal Corporation	13/08/2025	Justine agreed that the majority of the Project Area has been extensively disturbed, and that there is low potential for harm to Aboriginal heritage. Justine identified the importance of ongoing caring for country, and ensuring that native plants and animals can continue to find habitat in the Project Area post-development. Justine agreed that the north-east portion of the Project Area should be kept as a conservation area, and recommended that rehabilitation be undertaken to remove weeds and encourage the growth of native plants. She suggested that the area could be visited by nearby schools (for example, for Clean Up Australia Day), to teach students about conservation. She also recommended retention of as many mature trees as possible throughout the Project Area, particularly near the existing childcare centre and along the northern boundary, to ensure ongoing habitat for native animals.

3.3 Stage 4

The draft report was sent to the Registered Aboriginal Parties on 22 August 2025 and 28 days provided for comment (Table 5). A full record of correspondence can be found in the Aboriginal Community Consultation Log (Appendix 1).

Table 6. A summary of comments received for the draft Aboriginal Cultural Heritage Report.

Representative	Organisation	Date	Comment
Wendy Morgan	Guntawang Aboriginal Resources Incorporated	25/08/2025	Email – Supports the draft report
Justine Coplin	Darug Custodian Aboriginal Corporation	28/08/2025	Email – Agrees with the report recommendations
Darleen Johnson-Carroll	Murra Bidgee Mullangari Aboriginal Corporation	28/08/2025	Email – Endorses the recommendations
Lee Carroll	Meryhuiela	31/08/2025	Email – Agrees with the recommendations
Amanda De Zwart	Amanda Hickey Cultural Services	3/09/2025	Email – Supports the draft report
Phil Khan	Kamilaroi Yankuntjatjara Working Group	11/09/2025	Email – Supports the report and agrees with recommendations regarding native plants
Carolyn Hickey	A1 Indigenous Services	12/09/2025	Email – Supports the draft report

3.4 Summary

As a result of the Aboriginal consultation process, 16 RAPs were identified. Feedback from the Aboriginal consultation was incorporated into the assessment of significance and the development of heritage management and mitigation strategies for the Project.

4 Environmental and Heritage Context

This section outlines the environmental and heritage context for the Project Area.

4.1 Environmental Context

This section provides the environmental context for the assessment of past Aboriginal occupation in the Project Area, focusing on whether there are any landscape features likely to indicate the presence of Aboriginal objects. Such landscapes include undisturbed land:

- within 200m of waters, or
- located within a sand dune system, or
- located on a ridge top, ridge line or headland, or
- located within 200m below or above a cliff face, or
- within 20m of or in a cave, rock shelter, or a cave mouth (DECCW 2010c, 12).

4.1.1 Geology and Soils

The Project Area is in the Cumberland subregion of the Sydney Basin bioregion. This sub-region, comprising the Cumberland Plain, is a broad basin of Wianamatta Group Ashfield Shale, consisting of dark grey to black claystone-siltstone and fine sandstone-siltstone laminate (Clark and Jones 1991). While sheets of flat fine-grained sandstone could have been utilised for engravings/art, and for grinding axes and other stone artefacts if in proximity to water, and suitable outcrops of sandstone could have been used for rock shelters and art, no such sandstone is known to occur within the Project Area.

Overlying the geology is the Blacktown soil landscape, which is residual and comprises gently undulating rises with broad rounded crests and gently inclined slopes. Local relief is typically up to 30m and slopes >5% (Chapman and Murphy 2020, 39). On crests and ridges, this soil landscape is expected to consist of up to 30cm of friable brownish black loam (A₁ Horizon), overlying between 10-20cm of hard setting brown clay loam (A₂ Horizon), overlying clay (B Horizon) (Chapman and Murphy 2020, 40–41) (Figure 3). Aboriginal archaeological deposits within duplex soils are generally limited to A horizon soils, as B horizon clay soils (or bedrock) form a compact barrier through which artefacts typically do not penetrate. Therefore, if the Blacktown soils have not been subjected to erosion or stripping, and depending on the landform upon which they are located and in consideration of surrounding archaeological indicators, they may consist of 40-50cm of potential artefact bearing deposit.

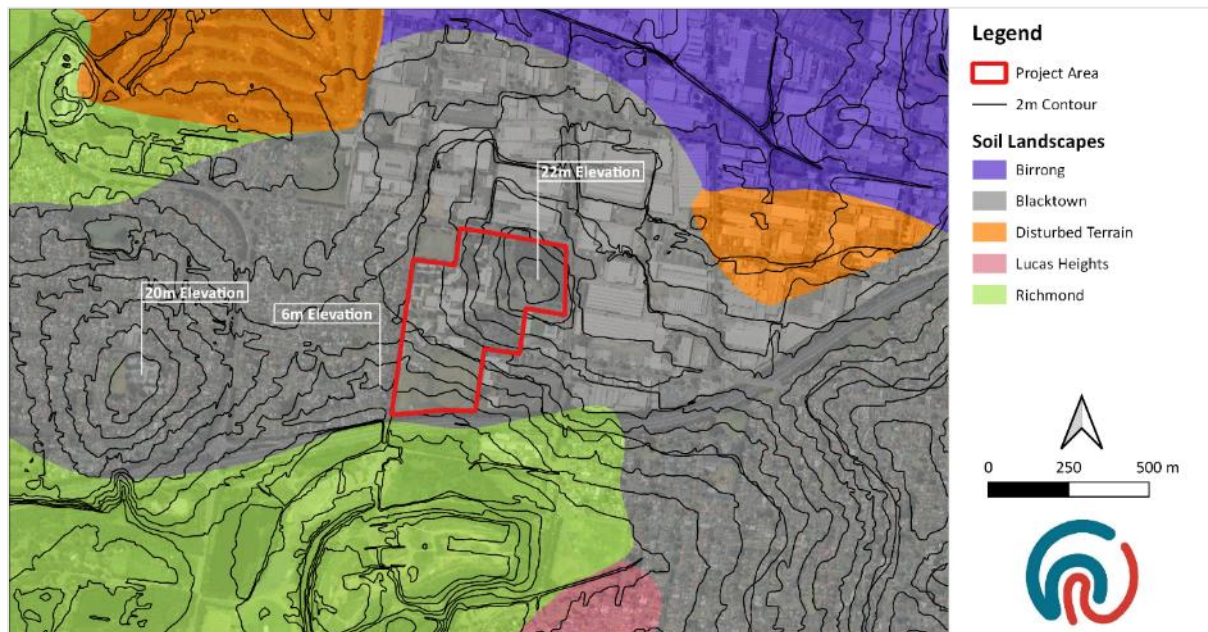


Figure 3. Soil landscape and topography of the Project Area and surrounding region. (Source: Soil Landscapes based on Chapman and Murphy 2020, SCP with Heritage Now additions)

4.1.2 Topography, Hydrology and Landforms

Access to fresh water is known as a primary consideration for Aboriginal people when selecting camp site locations. The sensitivity of waterways for Aboriginal campsites is also reflected in the Due Diligence Code of Practice, which considers areas within 200m of waters archaeologically sensitive (DECCW 2010c, 12).

The Project Area is situated across a hill crest and slope landform, with an elevation of 22m AHD in the north-eastern corner, sloping down to 6m AHD in the south-west (Figure 3). It is 250m north of a non-perennial 1st order stream which flows westward to the Georges River, 1.7km west of the Project Area (Figure 4). The stream is fresh water and may have been permanent in the past. Hydrology in the region has been extensively impacted by development, and south-west of the Project Area were wetlands according to a military map of 1929 (see Section 4.1.4). This proximity not only to fresh water, but the resources of wetlands and a position elevated above the floodplain, may have made the Project Area an attractive location for Aboriginal people in the past.



Figure 4. Hydrology of the Project Area and surrounding region. (Source: SCP with Heritage Now additions)

4.1.3 Flora and Fauna

This section is intended to give a general overview of the flora and fauna that may have been used by Aboriginal people in the past. The information is supplied for understanding the past Aboriginal use of the landscape and is not intended for ecological assessment purposes.

Past Aboriginal people may have encountered vegetation similar to Cumberland dry sclerophyll forest in the Project Area, dominated by ironbark eucalypts and paperbarks. Cumberland Dry Sclerophyll Forests are associated with gravelly clay soils on flat to undulating terrain with extensive shale plains. Fauna that inhabited these woodlands would likely have included bats, gliders, quolls, goannas and birds (Keith 2004).

Some of these species may have been used by Aboriginal people as raw materials for implements and weaving, as well as food and medicine. The hardwoods of eucalypts can be used to create tools such as digging sticks, clubs, throwing spears, shields, and boomerangs as well as vessels for carrying and collecting food (Nash, Daphne 2004, 7–8). The seed heads of kangaroo grass can be collected and used to produce flour to bake into damper (Nash, Daphne 2004).

4.1.4 Land Use

Land is disturbed if it has been the subject of human activity that has changed the land's surface, being changes that remain clear and observable. Examples include ploughing, construction of rural infrastructure, roads, trails and tracks, vegetation clearance, construction of buildings, structures, utilities and other impacts involving earthworks (DECCW 2010c, 18).

The Project Area is within a grant of 650 acres made to George Johnston Junior (Figure 5) in 1819, who grazed cattle and sheep including government herds (Yarwood 1967). A military map of 1929 (Figure 6) shows the western edge of the Project Area aligned with Ashford Avenue and subdivided into five lots with small houses along the roadway. In the north, next to Bullecourt Avenue, there is a school. This map appears to evidence the 'soldier settlement' which started to be developed in

Bankstown in 1917 over an estate which included the Project Area (Figure 7). The aim of the soldier settlement was to provide suitable land for returning soldiers and their families with different capacities and suitability (Allison 2009). The surveyor of the estate, S. F. Arnheim, prior to subdivision, described the land as:

... undulating sandy soils partly sandstone formation partly shale formation... There is suckling timber generally on the land, with thick undergrowth ti tree scrub thorn tree scrub of the usual coastal variety. There are some matured trees of little or no value... I would suggest that the land should be used for orchard and poultry farming (Allison 2009, 148).

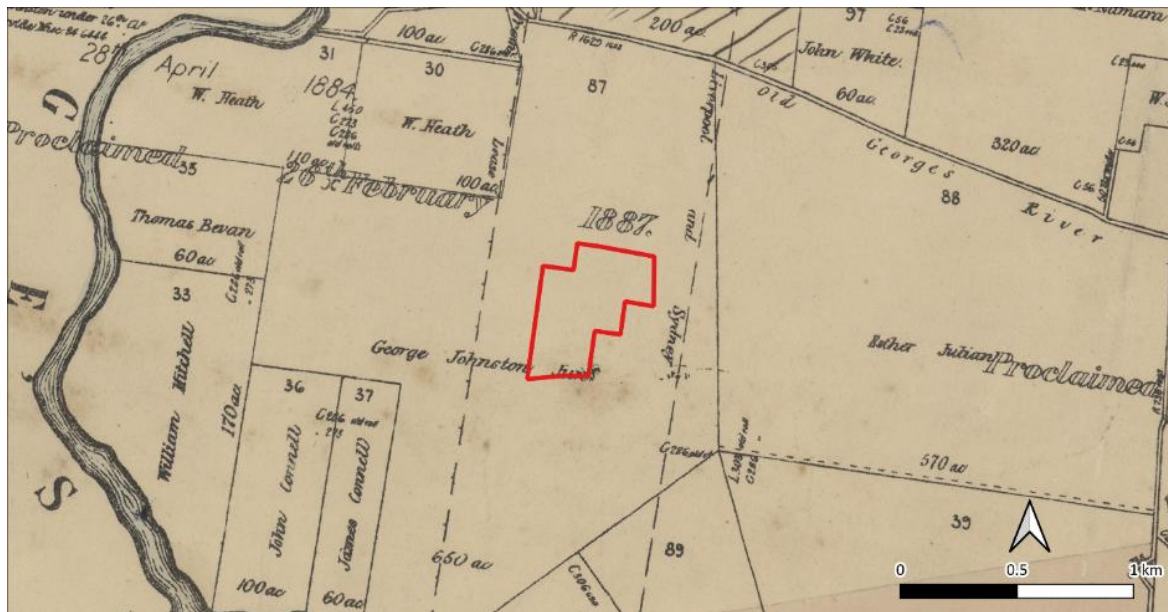


Figure 5. 1888 Bankstown parish map showing the Project Area. (Source: State Library of NSW, Record Identifier: 74VvLrOEwpb)

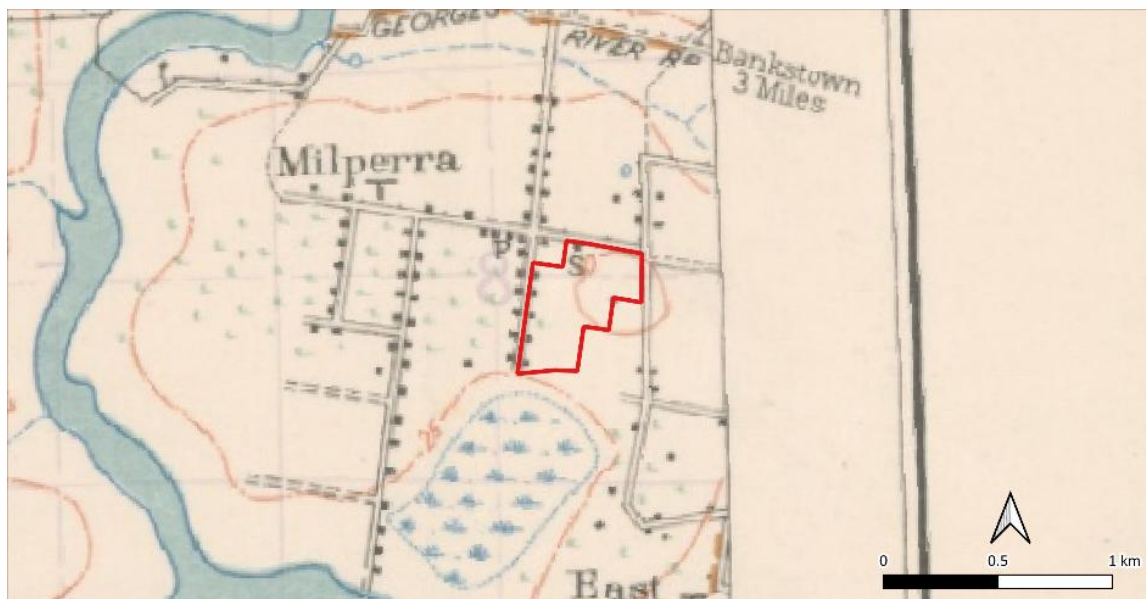


Figure 6. 1929 Military map showing the Project Area. (Source: National Library of Australia, obj-234339118, map number 422)

On the 1929 map, the Project Area is not marked as forested, unlike the land on the other side of Ashford Avenue or to the south-east. Directly south of the Project Area, there is swampland. A contemporary photograph of Bullecourt Avenue (Figure 8) shows the soldier settlement beginning to develop. There are thin stands of trees and low earth banks along the road, behind which the earth is flat, cleared and sandy. The topsoils of the Blacktown soil landscape have high levels of fine sand and silt (Chapman and Murphy 2020, 26), and it is possible that the removal of most of the vegetation has resulted in significant erosion and leeching as well as the transferral of windblown sands from closer to the river by this time.



Figure 8. Bankstown Soldiers' Settlement, Bullecourt Avenue, c.1920s. (Source: State Library of NSW, YoEMVN9)

An aerial photograph from 1947 (Figure 9) confirms that most of the land has been cleared of vegetation except for a forested area in the north-east and an area on the eastern boundary. The forested areas, however, are likely to be recent growth rather than original forest based on the observations of the 1917 survey. Industrial buildings and hardstand areas appear along Ashford Avenue, with the exception of three lots towards the south which appear to retain domestic architecture and paddocks.



Figure 9. The Project Area in 1947. (Source: NSW Government Historical Imagery)

A new College of Advanced Education was formed at the site after 1973. In 1976, 'general purpose Building 1' (Figure 10) was opened to cater for increased student numbers (University of Western Sydney 2017) and as the 1978 aerial photo illustrates, earlier market gardens, houses and industrial buildings had been removed to make way for further development of the site for education facilities. At this stage the forested area along the eastern margin of the Project Area had been removed, as had nearly half of the trees to the north-east. An oval sporting ground and an agricultural area were being constructed in the south and south-east. A photograph from 2005 (Figure 11) shows increasing development at the site, including multi-storey buildings on the western side of the Project Area north of the oval. There is an increase in the number of trees in the north and in the extent and thickness of the forested area in the north-east and there are two areas of asphalt carpark between this area and the buildings.



Figure 10. The Project Area in 1978. (Source: NSW Government Historical Imagery)



Figure 11. The Project Area in 2005. (Source: NSW Government Historical Imagery)

A satellite image of the Project Area from February 2025 (Figure 12) shows building along the whole western side on Ashford Avenue, building into the forested area on the north-east and demolition in the centre of the site with earthworks. A water detention basin has been installed in the south-western corner. An August 2025 image of the Project Area shows that all of the buildings in the western portion have been demolished (Figure 13).



Figure 12. The Project Area in February 2025. (Source: Google Earth Image © 2025 Airbus)

The majority of the Project Area has been heavily disturbed by earthworks and building over the past 50 years, with disturbance through clearing, building, earthmoving, agriculture and pastoral practices for 150 years before that. The forested area in the north-east may retain some topsoil and the potential for intact deposit, since it appears to have been the least disturbed terrain in the Project Area, although the vegetation is likely to be regrowth, considering particularly that it is not marked as forested on the 1929 map.



Figure 13. The Project Area in August 2025. (Source: Google Earth Image © 2025 Airbus).

4.2 Heritage Context

A review of the archaeological, ethno-historical and post-contact history of an area provides contextual information for Aboriginal sites within the local and regional landscape. Previous archaeological research undertaken in the region, as well as environmental factors, can inform predictive models for the locations of Aboriginal sites. Predictive models can be further refined by the consideration of the post-contact land use of the area, which may identify potential sources of post-depositional disturbances that may have occurred.

4.2.1 Historic Records of Aboriginal Occupation (Ethnohistory)

The Project Area falls within the traditional country of the Darug (also spelt Dharuk, Dharruk, Dharug and Daruk) language group. Darug territory extends from the Hawkesbury River in the north, to Appin in the south, and west into the Blue Mountains, an area which incorporates some of the oldest archaeological sites in the Sydney region (Attenbrow 2010, 18–19).

Available sources indicate that two distinct dialects of Darug were spoken at the time of European contact. These comprised a ‘coastal’ dialect, spoken on the Sydney peninsula and the country to the north of Port Jackson, and a ‘hinterland’ dialect, spoken on the Cumberland Plain from Appin in the south to the Hawkesbury River in the north (Attenbrow 2010, 34). This linguistic division is suggested to correspond to a broader economic division between ‘coastal’ and ‘hinterland’ Darug-speaking peoples.

A wide range of marine, freshwater, terrestrial and avian fauna were exploited by Darug-speaking peoples for food. Coastal groups are reported to have exploited a wide range of fish and shellfish, as well as crustacea such as crabs and crayfish, and marine mammals such as seals and whales. Hinterland groups, on the other hand, relied heavily on land mammals such as kangaroos, wallabies, possums, fruit bats and echidnas, with freshwater fish, shellfish, crustacea and tortoises and mammals (e.g. platypus and water rats) also eaten. Complementing faunal resources in both areas, were a range of plant foods, some of which were also used for medicine and implement manufacture. As highlighted by Attenbrow (2010, 18–19), although only about 20 plants in the Sydney region can be confidently identified as sources of food or raw materials on the basis of colonial observations, the presence in the region of over 200 plant species known to have been consumed in other parts of south-eastern Australia, suggests that the total number of plant foods exploited was likely much higher.

As in other parts of south-eastern Australia, a wide range of hunting and gathering gear was employed by Darug speaking peoples. Known tools and weapons include wooden fishing and hunting spears (variously barbed with shell, chipped stone tools, fish/shark teeth, sharpened fish or animal bone), wooden spear-throwers and boomerangs, fishing hooks (typically shell but also bird talons, bone and wood), lines and sinkers (small stones), ground stone hatchets, stone pounders and wedges, chipped stone tools such as ‘bondi points’ and scrapers, as well as wooden shields, clubs and digging sticks, bark baskets, net bags and wooden dishes (Attenbrow 2010, 85). Bark canoes were also widely used, and two major forms of shelter appear to have been utilised at the time of European contact: rock-shelters and small huts built from sheets of bark, branches and bushes.

Despite these general associations and historical records, there are no specific historical records of Aboriginal people in association with the Project Area.

4.2.2 Archaeological Background

Australia and New Guinea were connected as a single continental landmass called Sahul and have been occupied by humans for at least 65,000 years (Clarkson et al. 2017). Eastern NSW has been occupied from at least 50,000 years ago (Williams et al. 2017). The earliest archaeological evidence of occupation for the Sydney Basin comes from alluvial deposits at the Cranebrook Terrace, on the banks of the Nepean River about 25km north-west of the current Project Area, dating to approximately 41,700 +3000/-2000 years ago (ANU-4016), however most sites in the Sydney region date to the last 3,000 to 5,000 years (Attenbrow 2010, 18–19; Nanson, Young, and Stockton 1987, 77).

Most details of known Aboriginal archaeology in the region are contained in the AHIMS, discussed below (see Table 7 for a description of site types identified in the AHIMS search for the Project Area and its vicinity).

Table 7. Aboriginal site features description, as per OEH 2012 unless otherwise referenced.

Site Features	OEH 2012 Description
Aboriginal Resource and Gathering	Related to everyday activities such as food gathering, hunting, or collection and manufacture of materials and goods for use or trade.
Art	Art is found in shelters, overhangs and across rock formations. Techniques include painting, drawing, scratching, engraving, pitting, conjoining, abrading and the use of a range of binding agents and the use of natural pigments obtained from clays, charcoal and plants.
Artefact	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people.
Grinding Groove	A groove in a rock surface resulting from manufacture of stone tools such as ground edge hatchets and spears; may also include rounded depressions resulting from grinding of seeds and grains.
Modified Tree	Trees which show the marks of modification as a result of cutting of bark from the trunk for use in the production of shields, canoes, boomerangs, burials shrouds, for medicinal purposes, foot holds etc; or intentional carving of the heartwood of the tree to form a permanent marker to indicate ceremonial use/significance of a nearby area, again these carvings may also act as territorial or burial markers.
Potential Archaeological Deposit (PAD)	An area where sub-surface stone artefacts and/or other cultural materials are likely to occur' (DECCW 2010b, 38).
Shell	An accumulation or deposit of shellfish from beach, estuarine, lacustrine or riverine species resulting from Aboriginal gathering and consumption. Usually found in deposits previously referred to as shell middens. Must be found in association with other objects like stone tools, fish bones, charcoal, fireplaces/hearths or burials. Will vary greatly in size and components.

4.2.3 Aboriginal Heritage Information Management System (AHIMS)

Aboriginal sites recorded in NSW are registered with geographic co-ordinates in the AHIMS and are protected under the NPW Act. Data in AHIMS can provide information on Aboriginal site patterning, as well as showing if Aboriginal sites occur in the Project Area.

The AHIMS was searched on 9 March 2026 using coordinates GDA, Zone 56, Eastings 309895 to 318895 and Northings 6238125 to 6247125 (Appendix 2). The search produced a result of 80 sites (Figure 14), which include 18 that have been classified as not archaeological sites (and have therefore been removed from Table 8). The majority of the sites identified in the search are valid, usually meaning that they have not been subject to an AHIP. The AHIMS search indicates that two sites have been completely destroyed.

Over two-thirds of the sites within the search area include stone artefacts, and a third of sites are associated with sandstone (art, grinding groove or closed/shelter sites). The remaining sites are Potential Archaeological Deposits (PAD), modified trees, shell or Aboriginal resource and gathering sites (Table 8).

There are no registered sites within the Project Area, and the closest site is an area of PAD located 862m to the south-west.

Table 8. AHIMS site types.

Context	Site Types	Count	Per cent
Open sites	Artefact	21	33.87%
	PAD	5	8.06%
	Modified Tree	5	8.06%
	Artefact + Shell	3	4.84%
	Artefact + PAD	3	4.84%
	Shell	2	3.23%
	Art + Shell + Grinding Groove	1	1.61%
	Aboriginal Resource and Gathering + PAD	1	1.61%
	Grinding Groove	1	1.61%
	Artefact + Art + Shell	1	1.61%
Closed sites	Art	7	11.29%
	Artefact + Art + Grinding Groove	3	4.84%
	Artefact + Art + Shell	3	4.84%
	Artefact + Art	3	4.84%
	Artefact	2	3.23%
	Artefact + Shell	1	1.61%
Total		62	100%

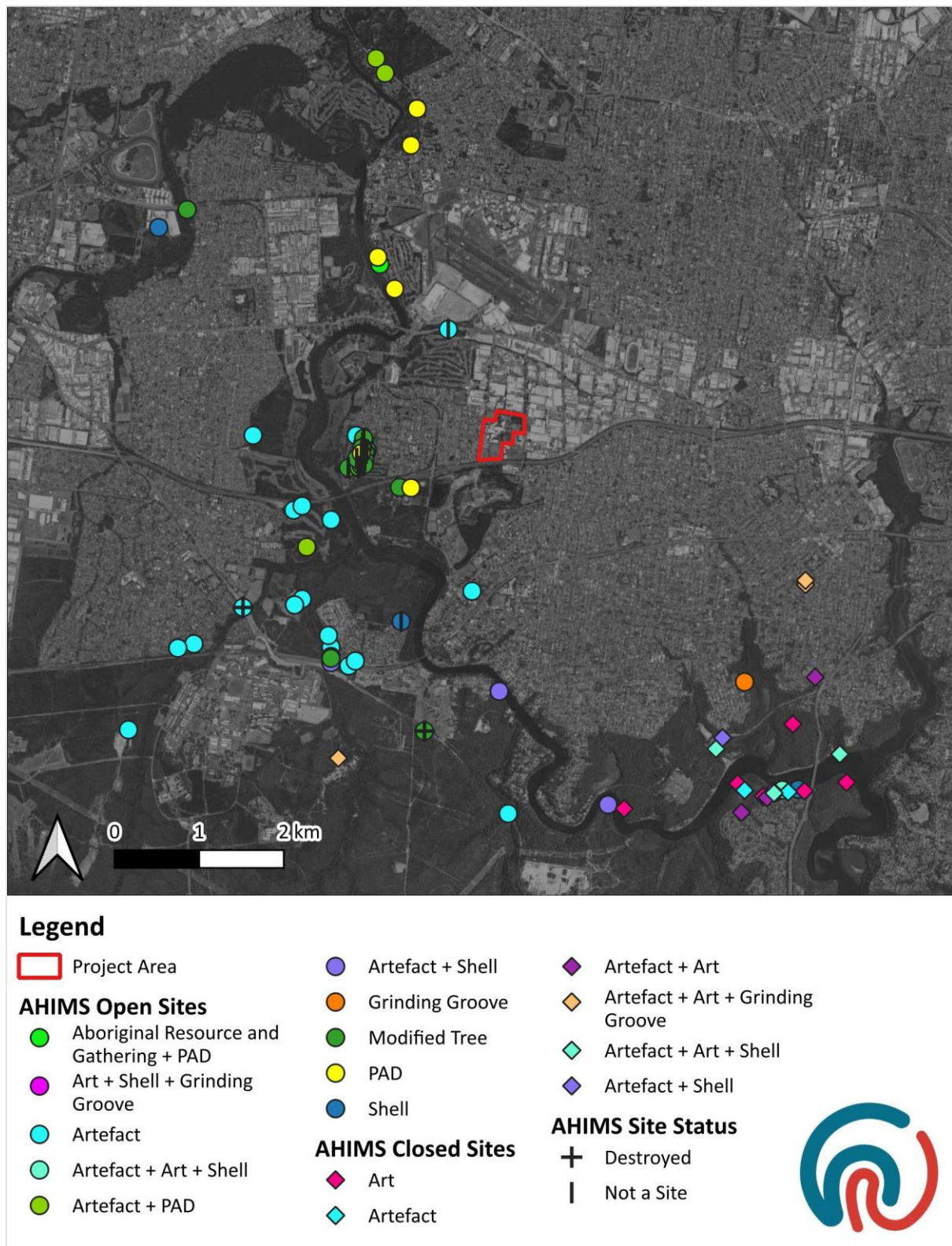


Figure 14. AHIMS search results. (Source: Google Satellite with Heritage Now and AHIMS additions)

4.2.4 Heritage Report Summaries

Heritage reports relevant to the Project Area have been summarised in this section to provide an understanding of the previous assessments that have been undertaken and the implications for Aboriginal site patterning.

Biosis (2023) Archaeological Survey, 270-286 Horsley Road, Milperra

Investigations were conducted into a 7.63ha study area located at 270-286 Horsley Road, Milperra for a proposed industrial development. This study area is located approximately 20m east of the current study area.

Geotechnical testing results were included in the report, noting:

- There were generally shallow to moderate fill deposits within the Project Area, overlying moderate to deep alluvial and residual clays.
- The Project Area has experienced considerable cutting and filling
- Fill deposits ranged between 0.7-4m in the east and 0.2-0.5m in the west of the Project Area
- Clay depths within the north-eastern portion of the Project Area ranged between 7.5-13m, suggesting the Project Area is on a transitional area between the Blacktown and alluvial Birrong soil landscapes

A pedestrian survey was conducted encountering poor visibility as the majority of the study area was sealed by asphalt and concrete. Ground surface exposures show soils consisted of imported materials. The study area was highly disturbed and may have been bulk excavated and filled with imported material to level the site. No Aboriginal sites or objects were identified.

The study area is considered to have high cultural significance, as it belongs to the broader cultural landscape that is connected to the Georges River; however, it has low archaeological potential. It was recommended Aboriginal site officers be present during the removal of the concrete and sealed surfaces, so soils can be inspected. If A horizon soils are identified an archaeologist is to be called to determine whether further investigation is required (Biosis 2023).

Haglund (1984) Archaeological Survey, Freeway No. 5, between King Georges Road Beverly Hills, and Heathcote Road Moorebank

An archaeological survey was conducted of a 12.7km long proposed freeway route from Moorebank to Beverly Hills. This study area is 30m south of the current Project Area. The survey identified two sites. Greenwood 1 was identified within the Greenwood Golf Course, comprising isolated artefacts sometimes spaced 100m apart, over an area approximately 750m x 80m. Isolated Find 1 was a silcrete flake, located behind Freda Place, west of Nuwarra Road. No Aboriginal sites or objects were identified within or near the current Project Area. As the proposed freeway would impact the edge of the artefact scatter (Greenwood 1), it was recommended that a permit be obtained for the partial destruction of the site, with care taken not to damage the remainder of the site; a permit to destroy Isolated Find 1 was also recommended (Haglund 1984).

Biosis (2006) Archaeological Survey, Agility Gas Main, Sydney Primary Loop: Liverpool to Marrickville

The route of a proposed new 30km natural gas main between Casula and Marrickville South was investigated. This study area is 252m south of the current Project Area.

A targeted archaeological survey was conducted along the route of the gas main. Over all, the survey identified that the majority of the route was highly disturbed and had low archaeological potential. The only areas with moderate archaeological potential were where Aboriginal sites were identified. A total of three sites were identified during the survey: SPL 1, SPL 2, and SPL 3.

An open campsite and PAD (SPL 1) was identified in the area of the Lieutenant Cantello Reserve, Hammondville. A total of seven artefacts of mudstone and quartz were identified along a 40m stretch of road verge, and may have been washed down from further uphill. The associated PAD is located across a river flat landform, extending from the western gate of the Reserve, to the western bank of the Georges River. The sites SPL 2 and SPL 3 were identified within Deepwater Park, Milperra. A scarred tree (SPL 2) consisted of a dead Eucalypt tree that has two scars: scar 1 is probably of Aboriginal origin due to its symmetrical growth, and scar 2 is possibly of Aboriginal origin as it has asymmetrical regrowth. Drill holes were observed on the trunk and on several trees nearby, suggesting the trees may have been poisoned. Site SPL 3 is an identified PAD within the Park, and encompassed the pond banks and river flat landforms within the Park.

The cultural significance of the identified sites was not provided by Aboriginal stakeholders. However, in terms of scientific significance, the sites SPL 1 and SPL 3 were considered to have low significance and SPL 2 had moderate significance. It was recommended that a consent to destroy permit should be obtained for the sites SPL 1 and SPL 3 for the destruction of the associated PADs, as they have low archaeological integrity. Under this permit, the artefacts identified at SPL 1 should be removed and deposited in an agreed upon repository. The site SPL 2 should be fenced off and protected during the works. It is recommended for the site's long term management that the tree is inspected by an arborist to assess its condition, stability, and potential for deterioration (Biosis Research 2006).

Austral Archaeology (2022) Archaeological Survey, 339-349 Horsley Road, Milperra

A study area at 339-349 Horsley Road, Milperra was investigated for a proposed new two-story multi unit warehouse facility. It is located approximately 340m north of the current Project Area. A pedestrian survey was conducted, encountering low visibility and extensive disturbance from the industrial development within the study area. No Aboriginal objects or sites were identified. The archaeological potential of the site was considered to be low. It was recommended no further assessments of the study area are required (Austral Archaeology 2022).

AHMS (2012) Archaeological Survey, Riverlands Golf Course, Milperra

The area of the Riverlands Golf Course was investigated for a potential rezoning of the southeastern portion. This study area is located approximately 1.246km west of the current Project Area.

Geotechnical testing was undertaken within the study area in 2006. A total of seven test pits were excavated to depths between 1.6-3.4m. The results indicated that 0.2-1.6m of soil consisted of either fills (sandy clay mixed with brick, plastic or ironstone fragment) or dark brown silty clay top soils. This overlies dark brown medium grained sand to grey sand with some silt between the depths of 0.8-2m. In the southern and eastern portions of the study area the fill and top soils deposits overlaid yellow brown mottled clay deposits that had weathered sandstone and/or silty clays.

A pedestrian survey was undertaken, encountering low visibility due to vegetation coverage. Exposure were inspected and not natural soil profiles were identified. Parts of the study area were found to be extensively disturbed from the construction of buildings and dams and water features.

The southeastern portion of the study area was at a higher elevation compared to the rest of the study area, and while it was difficult to determine the level of disturbance in this portion, it was likely to have been used and occupied by past Aboriginal people. No Aboriginal sites or objects were identified.

Overall, almost the entire study area is considered to have low-moderate archaeological sensitivity, while the south-eastern portion has moderate-high archaeological sensitivity. It was recommended that subsurface investigations be undertaken across the entire study area, to compare the results of the moderate-high and the low-moderate archaeologically sensitivity areas (Archaeological & Heritage Management Solutions 2012).

Heritage Concepts (2007) Archaeological Survey, Riverlands, Milperra

Investigations were conducted into a 90ha area on the eastern side of the Georges River, where the Riverlands precinct is proposed. This study area includes the Riverlands Golf Course and an area that has been sand mined. The proposed development includes the construction of residential developments; outdoor recreation areas; marine, hotel and retail precincts; and relocation of the existing golf course. This study area is located approximately 1.246km west of the current Project Area.

An archaeological survey was conducted across the study area. The study area was found to be extensively disturbed by past land use practices, such as sanding mining and the construction of dams and drainage channels, and many areas are considered to have no potential for Aboriginal sites to survive. No Aboriginal sites or objects were identified and was considered to have very low potential to retain archaeological material. There are no archaeological constraints for the proposed development (Heritage Concepts 2007).

Urbis (2024) Archaeological Survey, 61 Milperra Road, Revesby

The site of a proposed new multi-story private hospital was investigated. This study area is approximately 1.8km northwest of the Project Area.

Geotechnical investigations were conducted within the study area. A total of 31 boreholes were drilled, finding the natural soils had been removed and fill used to level the site. In the southern portion of the study area, topsoil consisting of fill material overlies natural clay soils.

A pedestrian survey was conducted, encountering low ground surface visibility due to the existing warehouse buildings and sealed surfaces. The site had experienced ground disturbance from cut and fill activities to level the site, as well as for the construction of warehouses, vehicle access, and parking. No Aboriginal sites or artefacts were identified.

It was considered the study area had low archaeological potential and low archaeological significance. There are no archaeological constraints for the proposed development (Urbis 2024).

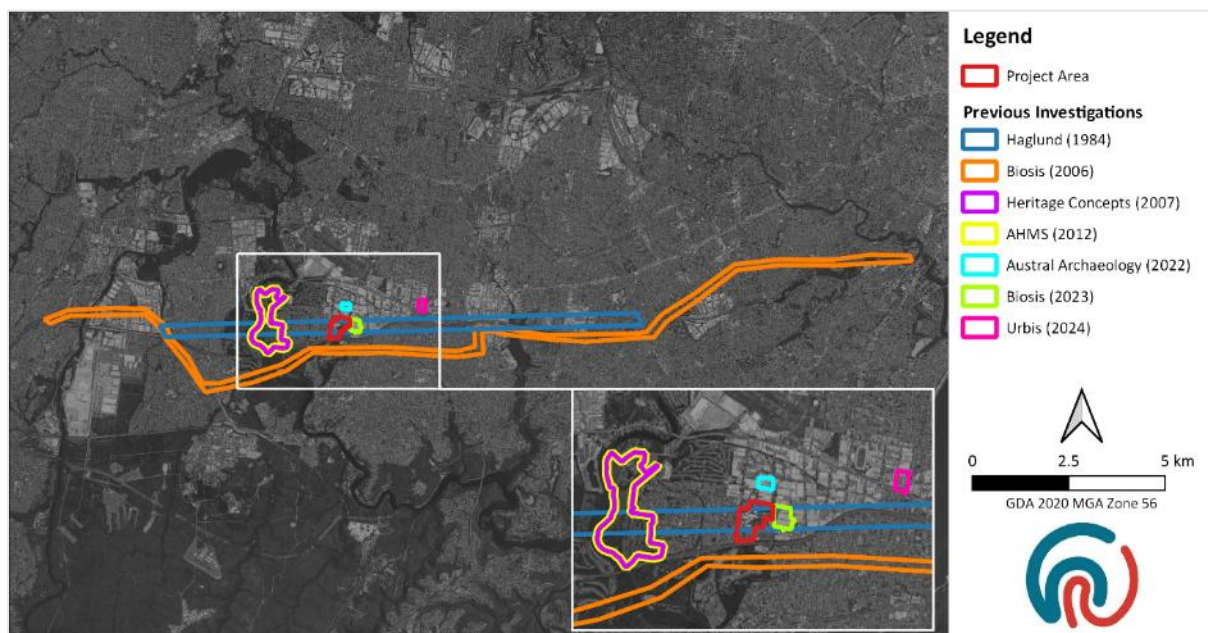


Figure 15. Nearby archaeological investigations discussed in Section 4. (Source: SCP with Heritage Now and AHIMS additions)

4.2.5 Synthesis and Predictive Modelling

The Project Area is located within the Cumberland subregion of the Sydney Basin bioregion and is situated across a hill crest and slope landform. It is 250m north of a non-perennial 1st order stream and 1.7km east of the estuarine Georges River. As the Project Area is in the vicinity of water, estuarine and woodland resources, it may have been attractive as a resource and food gathering location for past Aboriginal people. However, an analysis of past land-use suggests that ground disturbance has occurred throughout the majority of the Project Area, as a result of vegetation clearance and the construction and demolition of education buildings and associated services and amenities.

A search of the AHIMS database identified no registered sites within the Project Area, the closest being an area of PAD approximately 862m south-west. Within the AHIMS search area, artefact sites represent over two-thirds of registered sites, with a third of the total number of sites associated with sandstone (art, grinding groove or shelter sites); however, no suitable sandstone outcrops are known to occur within the Project Area.

Previous investigations nearby (Biosis 2023; Haglund 1984, Austral Archaeology 2022) have not identified any Aboriginal sites near the Project Area. These previous investigations have generally found the Milperra area to be highly disturbed from past land use activities, and unlikely to retain any evidence of past Aboriginal occupation.

A review of the environmental and heritage context indicates that the most likely site types to occur within the Project Area are low-density artefact sites; however, any such sites are likely to occur in disturbed contexts.

5 Archaeological Survey

The aim of the survey was to identify Aboriginal sites within the Project Area as per the guidelines (DECCW 2010b, 12)

The Project Area was surveyed by Jenna Weston of Heritage Now and Justine Coplin of Darug Custodian Aboriginal Corporation on 13 August 2025. All landforms were sampled, and the survey units are shown in Figure 16.



Figure 16. Illustration of Survey Units. (Source: SCP with Heritage Now additions)

5.1 Survey Results

The Project Area was surveyed in two survey units, based on landform and levels of prior disturbance (Figure 16). The overall visibility of the Project Area was generally good, despite being somewhat affected by vegetation coverage and areas of hardstand, particularly in the north and east (Table 9, Table 10). No Aboriginal objects or areas of potential archaeological deposit were found.

Table 9. Survey coverage.

Survey Unit	Landform	Survey Unit Area (m ²)	Exposure (%)	Visibility (%)	Effective Coverage Area (m ²)	Effective Coverage (%)
1	Crest	27,000	1	90	243	0.9
2	Slope	170,000	70	100	119,000	70

Table 10. Landform summary – sampled areas.

Landform	Landform Area (m ²)	Effective Coverage Area (m ²)	Landform Effectively Surveyed %	Number of Sites	Number of Artefacts/ Features
Crest	27,000	243	0.9	0	0
Slope	170,000	119,000	70	0	0

Survey Unit 1 (SU1)

This survey unit comprises the forested crest in the north-east portion of the Project Area. It is the least disturbed terrain in the Project Area, although the vegetation appears to be regrowth (Plate 1). Weeds and rubbish were prevalent around the boundary, adjacent to the fenceline along Bullecourt Avenue (to the north) and Horsley Road (to the east) and the ATF fencing along the driveway (to the west). There was also a telecommunications facility adjacent to the eastern fence (Plate 2). The interior of this area was relatively free of weeds and rubbish, with a low grass and small tree layer amongst the taller trees (Plate 3), and there were some larger trees to the north of the existing childcare centre (Plate 4). Visibility in this area was relatively limited due to vegetation but there were some small areas of exposure, which showed dark brown topsoil with natural stone inclusions (Plate 5). No stone artefacts or modified trees were found.

Survey Unit 2 (SU2)

This survey unit comprises the slope down from the crest in SU1, and has been heavily disturbed by building construction and demolition, installation of services and drainage control/earthworks. Visibility was good, and soils were predominantly clays and sands with extensive demolition rubble throughout (Plate 6). Other than disturbance in the former location of buildings, there was evidence of services and other major earthworks/landscape modification, particularly in the east and south (Plate 7). This modification appears to have been undertaken to control drainage, as the landform slopes down towards the south-east; the south-east portion of the Project Area was low-lying and likely floodprone prior to the landform being built up (Plate 8). There were casuarina trees between the southern fenceline of the Project Area and the adjacent M5 motorway, indicating a water-prone area (Plate 9). There were some larger trees, particularly along the northern boundary, but no evidence of Aboriginal modification was seen (Plate 10).

5.1.1 Aboriginal Consultation

Justine Coplin of Darug Custodian Aboriginal Corporation agreed that the majority of the Project Area has been extensively disturbed, and that the archaeological sensitivity is low. Justine identified the importance of ongoing caring for country, and ensuring that native plants and animals can continue to find habitat in the Project Area post-development. Justine agreed that the north-east portion of the Project Area should be kept as a conservation area, and recommended that rehabilitation be undertaken to remove weeds and encourage the growth of native plants. She suggested that the area could be visited by nearby schools (for example, for Clean Up Australia Day), to teach students about conservation. She also recommended retention of as many mature trees as possible throughout the Project Area, particularly near the existing childcare centre and along the northern boundary, to ensure ongoing habitat for native animals.

5.1.2 Summary

No Aboriginal objects or areas of potential archaeological deposit were found during the survey, and the majority of the Project Area has been extensively disturbed. As such, the archaeological sensitivity is assessed to be low.

6 Significance Assessment and Aboriginal Cultural Values

Cultural heritage refers to the tangible and intangible values that we choose to pass on to future generations. In order to identify the values worth passing on, a significance assessment needs to be undertaken. The significance assessment needs to identify the range of values present across the Project Area and assess their importance.

6.1 Methodology

Identifying the Aboriginal cultural values is part of the significance assessment process and is guided by the Burra Charter and the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*.

There are four recognised classes of values under the Burra Charter (Australia ICOMOS 2013):

- Social,
- Historical,
- Aesthetic, and
- Scientific.

Within this significance assessment, Aboriginal cultural values are captured within social, historical and aesthetic values. The archaeological values are contained within scientific values.

Social value refers to the spiritual, traditional, historical or contemporary associations that Aboriginal people have for place. Historical value refers to the associations of a place with a historically important person, event, phase or activity in the Aboriginal community. Aesthetic value refers to the sensory, scenic, architectural and creative aspects of the place.

Archaeological values refer to the importance of the landscape, area, place or object because of its rarity, representativeness and the extent to which it may inform our understanding of Aboriginal culture.

6.1.1 Aboriginal Cultural Values Methodology

Aboriginal cultural values are identified through the Aboriginal consultation process. Formal opportunities for the Aboriginal community to contribute to identifying cultural values are provided in the ACHA methodology review period, during fieldwork and during the draft report review period. In addition, RAPs are invited to provide feedback at any time through the consultation process, by phone or in writing (email or letter).

6.1.2 Archaeological (Scientific) Values Methodology

Archaeological (scientific) values relate to whether the Project Area can contribute to our understanding of Aboriginal culture. Under the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, archaeological values are to be considered within the below sub-categories:

- Representativeness,
- Rarity,
- Research potential, and
- Educational potential.

Significance is expressed as grades: low, moderate or high.

6.2 Aboriginal Cultural Values Assessment

Phil Khan of Kamilaroi Yankuntjatjara Working Group has identified that the Project Area is significant and sensitive to their people. During the survey, Justine Coplin of Darug Custodian Aboriginal Corporation identified the importance of ongoing caring for country, and ensuring that native plants and animals can continue to find habitat in the Project Area.

6.3 Historical and Aesthetic Values Assessment

The Project Area is not known to be associated with a historically important person, event, phase or activity in the Aboriginal community, and is therefore of low historical value.

The Project Area is of low aesthetic value in terms of sensory, scenic, architectural or creative aspects.

6.4 Archaeological Values Assessment

This section assesses the archaeological values of the Project Area according to the criteria in the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*.

No Aboriginal objects have been found in the Project Area, and there is assessed to be low archaeological potential/value.

6.5 Summary: Statement of Significance

The Project Area is assessed to be of low historic, archaeological and aesthetic significance, and moderate cultural significance.

7 Impact Assessment and Mitigation

This section assesses the potential impact of the proposed works in relation to Aboriginal heritage values in the Project Area and provides options for mitigating loss of Aboriginal cultural values.

7.1 Proposed Works

The proposed development involves the construction of 49 dwelling houses, three (3) public parks, new roads and shared paths, civil infrastructure, a car park, and the management of conservation land. The proposed development also involves the subdivision of 49 residential lots, lots for land to be dedicated to the Council including parks and infrastructure and remaining residential super lots across the site.

Specifically, the proposed SSDA will seek consent for the following:

- Tree removal
- Site remediation (excluding works carried out as category 2 remediation works)
- Construction of bulk earthworks, public roads and landscaping, and services
- Augmentation of existing services and road infrastructure
- Construction of three (3) public parks
- Construction of 49 dwelling houses
- Construction of a carpark to service the existing childcare centre and E1 Local Centre zoned land
- Subdivision resulting in 49 residential lots, infrastructure lots, remaining super lots across the site, and the creation of a community title lot for land zoned C2 Environmental Conservation and E1 Local Centre
- Conservation works including the management of >2Ha Cumberland Plain Woodland Species.

The SSDA will seek consent for the staged delivery of the development (Figure 17). The general breakdown of each construction stage includes:

- Stage 1 – Commencement of site-wide tree removal and land remediation, creation of two (2) super lots and total of 22 residential lots, and construction of 22 dwelling houses fronting Ashford Avenue. This will be the first stage to be delivered and will connect into the existing infrastructure that located within Ashford Avenue.
- Stage 2 – Creation of four (4) super lots, a new lot (Lot 25) across the RE1 Public Recreation zoned land, and 27 residential lots. This stage also involves the construction of 27 dwellings within Stage 2, and the construction of new roads and the new public park referred to in the Civil Plans as the ‘Central Park’.
- Stage 3a – Creation of a new super lot, and the construction of perimeter roads surrounding the existing childcare centre and C2 Environmental Conservation zoned land. It is proposed all associated civil works required to enable the operation of the existing childcare centre will be delivered under this stage. The new traffic intersections at both Bullecourt Avenue and Horsley Road will be constructed.
- Stage 3b – Creation of three (3) lots to be delivered under a Community Title Scheme, and the construction of a new car park to service the childcare centre and E1 Local Centre zoned land.

- Stage 4 – Creation of eight (8) super lots, a new lot (Lot 50) across the RE1 Public Recreation zoned land, and a new lot (Lot 49) across the SP2 Infrastructure zoned land. This stage also involves the construction of new roads, the stormwater infrastructure Basin 1 and Basin 2, and the new public park referred to in the Civil Plans as the ‘Southern Park’, all to be dedicated to Council. It is noted that the eight (8) super lots are designed to accommodate 107 final residential lots, but this additional subdivision will form part of a future application.
- Stage 5 – Creation of six (6) super lots, and construction of new roads and civil works. which make up a total of sixty-three (63) final residential lots and all associated road and civil works. It is noted that the six (6) super lots are designed to accommodate 63 final residential lots, but this additional subdivision will form part of a future application.
- Stage 6 – Creation of nine (9) super lots and a new lot (70) across the RE1 Public Recreation zoned land. This stage also involves the construction of new roads and civil works, and the new public park referred to in the Civil Plans as the ‘Northern Park’, all to be dedicated to Council. It is noted that the nine (9) super lots are designed to accommodate 92 final residential lots, but this additional subdivision will form part of a future application.
- Stage 7 – Creation of six (6) super lots, and construction of road and civil works. It is noted that the six (6) super lots are designed to accommodate 59 final residential lots, but this additional subdivision will form part of a future application.



Figure 17. Proposed subdivision staging and development. (Source: Overall Layout Plan, Beveridge Williams, 11/07/2025)

7.2 Impact Assessment

No Aboriginal objects or areas of potential archaeological deposit were identified in the Project Area, and the archaeological sensitivity is assessed to be low. As such, no Aboriginal heritage impacts are anticipated from the proposed works and no AHIP is required.

7.3 Management Measures

The below strategies have been developed to prevent harm and/or loss of Aboriginal cultural values as a result of the proposed works.

All on-site personnel are to be made aware of their obligations under the NPW Act, which includes protection of Aboriginal sites and the reporting of any new, or suspected, Aboriginal heritage sites. This may be done through an on-site induction or other suitable format.

In the unlikely event that Aboriginal or suspected Aboriginal archaeological material is uncovered during the development, then works in that area are to stop and the area cordoned off. The Project Manager is to contact the Heritage Consultant to make an assessment as to whether the material is classed as Aboriginal object/s under the NPW Act and advise on the required management and mitigation measures. Works are not to re-commence in the cordoned off area until heritage clearance has been given and/or the required management and mitigation measures have been implemented.

In the unlikely event that human remains, or suspected human remains are uncovered during the development, then works in that area are to stop and the area cordoned off. The Project Manager is to contact the NSW Police to establish whether the area is a crime scene. If it is not a crime scene, and the remains are determined to be Aboriginal ancestral remains, then Heritage NSW is to be notified via the Environment Line on 131555 and management measures are to be devised in consultation with RAPs. Works are not to recommence in the area until the management measures have been implemented.

7.4 Consideration of Sustainable Development

Under the NSW *Protection of the Environmental Administration Act 1991*, ecologically sustainable development principles (ESD) are to be considered in the assessment of environmental impacts; and this includes impacts to heritage. The consideration of ESD principles is required under the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales 2010*. In particular, the precautionary principle and the principle of inter-generational equity are to be considered where there are proposed impacts to the environment (which includes heritage).

7.4.1 Precautionary Principle

The precautionary principle states that if there are threats of serious or irreversible damage to the environment, then a lack of full scientific certainty should not be used as a reason to postpone measures to prevent environmental degradation.

The proposed works do not pose a threat of serious or irreversible damage to the environment, as no Aboriginal objects have been identified and no Aboriginal heritage impacts are anticipated from the proposed works.

7.4.2 Inter-generational Equity & Cumulative Harm

The principle of inter-generational equity states that the present generation should ensure the health, diversity and productivity of the environment are maintained or enhanced for the benefit of future generations. Cumulative harm is understanding the cumulative effects of the Proposal.

No Aboriginal objects will be impacted and thus the proposed works do not pose a threat to inter-generational equity.

7.5 Summary

No Aboriginal objects will be impacted by the proposed works and no AHIP is required.

8 Conclusions and Recommendations

An archaeological survey of the Project Area was undertaken by Jenna Weston of Heritage Now and Justine Coplin of Darug Custodian Aboriginal Corporation on 13 August 2025. No Aboriginal objects or areas of potential archaeological deposit were found, and the majority of the Project Area has been extensively disturbed. As such, the archaeological sensitivity is assessed to be low and no Aboriginal heritage impacts are anticipated from the proposed works.

The Project Area is assessed to be of low historic, archaeological and aesthetic significance, and moderate cultural significance.

Heritage Now makes the following recommendations.

Recommendation 1

All on-site personnel are to be made aware of their obligations under the NPW Act, which includes protection of Aboriginal sites and the reporting of any new, or suspected, Aboriginal heritage sites. This may be done through an on-site induction or other suitable format.

Recommendation 2

In the unlikely event that Aboriginal or suspected Aboriginal archaeological material is uncovered during the development, then works in that area are to stop and the area cordoned off. The Project Manager is to contact the Heritage Consultant to make an assessment as to whether the material is classed as Aboriginal object/s under the NPW Act and advise on the required management and mitigation measures. Works are not to re-commence in the cordoned off area until heritage clearance has been given and/or the required management and mitigation measures have been implemented.

Recommendation 3

In the unlikely event that human remains, or suspected human remains are uncovered during the development, then works in that area are to stop and the area cordoned off. The Project Manager is to contact the NSW Police to establish whether the area is a crime scene. If it is not a crime scene, and the remains are determined to be Aboriginal ancestral remains, then Heritage NSW is to be notified via the Environment Line on 131555 and management measures are to be devised in consultation with RAPs. Works are not to recommence in the area until the management measures have been implemented.

9 References

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10Plates



Plate 1. Relatively undisturbed forested area in the north-east of the Project Area (SU1), showing regrowth vegetation. View to north-east towards the fence along Bullecourt Avenue. (Source: Heritage Now 2025)



Plate 2. Telecommunications facility adjacent to the eastern fence in SU1, view to south. (Source: Heritage Now 2025)



Plate 3. Interior of SU1, showing a low grass and small tree layer amongst the taller trees. (Source: Heritage Now 2025)



Plate 4. Larger trees to the north of the existing childcare centre. (Source: Heritage Now 2025)



Plate 5. Example of small area of exposure in SU1 (adjacent to the eastern fenceline, with some rubbish evident), showing dark brown topsoil with natural stone inclusions. (Source: Heritage Now 2025)



Plate 6. Good visibility showing clay/sand with building rubble, following demolition of former buildings in SU2. (Source: Heritage Now 2025)



Plate 7. Evidence of services and drainage trench in the western part of the Project Area (SU2). (Source: Heritage Now 2025)



Plate 8. Major earthworks/landscape modification to build up the landform above the low-lying south-western portion of the Project Area. (Source: Heritage Now 2025)



Plate 9. Casuarina trees between the southern fenceline of the Project Area and the adjacent M5 motorway, indicating a water-prone area. (Source: Heritage Now 2025)



Plate 10. Some larger trees along the northern boundary of SU2. (Source: Heritage Now 2025)

Appendix 1 Aboriginal Consultation

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Agency Letter						
Sir or Madam	National Native Title Tribunal	Joven Sanchez	Heritage Now	Email	18/04/2025	
Sir or Madam	Native Title Services Corp	Joven Sanchez	Heritage Now	Email	18/04/2025	
Sir or Madam	Register of Aboriginal Owners	Joven Sanchez	Heritage Now	Email	18/04/2025	
Sir or Madam	Heritage NSW	Joven Sanchez	Heritage Now	Email	18/04/2025	
CEO	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	18/04/2025	
Sir or Madam	City of Canterbury Bankstown	Joven Sanchez	Heritage Now	Email	18/04/2025	
Sir or Madam	Greater Sydney Local Land Services	Joven Sanchez	Heritage Now	Email	18/04/2025	
Agency Letter Response						
	Heritage Now		Greater Sydney Local Land Services	Email	22/04/2025	"GS LLS feels that it is not a primary source of contact for First Nations (Aboriginal) communities or persons that may inform or provide comment on development or planning issues. GS LLS strongly recommends you contact Heritage NSW to seek their advice on all-inclusive contact lists of persons and organisations who 'speak for Country' and that may assist with your investigation."
Holly Winter	Heritage Now	Barry Gunther	Heritage NSW	Email	22/04/2025	Sent list of potential Aboriginal stakeholders

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Holly Winter	Heritage Now	Daliah Aggrey-Fynn	Gandangara Local Aboriginal Land Council	Email	24/04/2025	"We don't have any specific groups to recommend. However, can you please register Gandangara LALC as having an interest in the project."
Holly Winter	Heritage Now	Karen Carter	Register of Aboriginal Owners	Email	29/04/2025	Suggests contacting Gandangara LALC
Expressions of Interest Letters						
Carolyn Hickey	A1 Indigenous Services	Joven Sanchez	Heritage Now	Email	2/05/2025	
Amanda De Zwart	Amanda Hickey Cultural Services	Joven Sanchez	Heritage Now	Email	2/05/2025	
Jamie Eastwood	Aragung Aboriginal Cultural Heritage Site Assessments	Joven Sanchez	Heritage Now	Email	2/05/2025	
Darren Hampton	B.H. Heritage Consultants	Joven Sanchez	Heritage Now	Email	2/05/2025	
Ralph Hampton	B.H. Heritage Consultants	Joven Sanchez	Heritage Now	Email	2/05/2025	
Nola Hampton	B.H. Heritage Consultants	Joven Sanchez	Heritage Now	Email	2/05/2025	
Karia Lea Bond	Badu	Joven Sanchez	Heritage Now	Email	2/05/2025	
Kayelene Slater	Bariyan Cultural Connections	Joven Sanchez	Heritage Now	Email	2/05/2025	
Jody Kulakowski	Barking Owl Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
James Carroll	Bidjawong Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Simalene Carriage	Bilinga	Joven Sanchez	Heritage Now	Email	2/05/2025	
Jennifer Beale	Butucarbin Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Marilyn Carroll-Johnson	Corroboree Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Corey Smith	Cullendulla	Joven Sanchez	Heritage Now	Email	2/05/2025	
Paul Hand	Darug Boorooberongal Elders Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Jamie Workman, Anna Workman, & Anna O'Hara	Darug Land Observations	Joven Sanchez	Heritage Now	Email	2/05/2025	Failed to deliver; recipient email full
Andrew Bond	Dharug	Joven Sanchez	Heritage Now	Email	2/05/2025	
Dirk Schmitt	Dharug Ngurra Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Paul Boyd & Lilly Carroll	Didge Ngunawal Clan	Joven Sanchez	Heritage Now	Email	2/05/2025	
Clive Freeman	Freeman & Marx	Joven Sanchez	Heritage Now	Email	2/05/2025	
Nigel Millgate	Gadhungal Marring	Joven Sanchez	Heritage Now	Email	2/05/2025	
Colin Walker	Gadu CHTS	Joven Sanchez	Heritage Now	Email	2/05/2025	
Robert Slater	Galamaay Cultural Consultants	Joven Sanchez	Heritage Now	Email	2/05/2025	
Krystle Carroll Elliott & Steven Johnson	Ginninderra Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Basil Smith	Goobah Development	Joven Sanchez	Heritage Now	Email	2/05/2025	
Caine Carroll	Goodradigbee Cultural & Heritage Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Wendy Smith	Gulaga	Joven Sanchez	Heritage Now	Email	2/05/2025	
Shayne Dickson	Gunjeewong Cultural Heritage Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Wendy Morgan	Guntawang Aboriginal Resources Incorporated	Joven Sanchez	Heritage Now	Email	2/05/2025	
Kylie Ann Bell	Gunya	Joven Sanchez	Heritage Now	Email	2/05/2025	

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Joanne Anne Stewart	Jerriongong	Joven Sanchez	Heritage Now	Email	2/05/2025	
Phil Khan	Kamilaroi Yankuntjatjara Working Group	Joven Sanchez	Heritage Now	Email	2/05/2025	
Korri Currell	Koori Digs Services	Joven Sanchez	Heritage Now	Email	2/05/2025	
Ethan Trewlynn	Long Gully Cultural Services	Joven Sanchez	Heritage Now	Email	2/05/2025	
Nathan Moran	Metropolitan Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	2/05/2025	
Aaron Broad	Minnamunnung	Joven Sanchez	Heritage Now	Email	2/05/2025	
Kaya Dawn Bell	Munyunga	Joven Sanchez	Heritage Now	Email	2/05/2025	
Phillip Carroll	Mura Indigenous Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Darleen Johnson-Carroll & Ryan Johnson	Murra Bidgee Mullangari Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Roxanne Smith	Murramarang	Joven Sanchez	Heritage Now	Email	2/05/2025	
Mark Henry	Murrumbul	Joven Sanchez	Heritage Now	Email	2/05/2025	
Alan Medhurst	Nattai Aboriginal Culture & Heritage Consultation Service	Joven Sanchez	Heritage Now	Email	2/05/2025	
Kaarina Slater	Ngambaa Cultural Connections	Joven Sanchez	Heritage Now	Email	2/05/2025	
Newton Carriage	Nundagurri Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Pemulwuy Johnson	Pemulwuy	Joven Sanchez	Heritage Now	Email	2/05/2025	
Raymond Weatherall	RAW Cultural Healing	Joven Sanchez	Heritage Now	Email	2/05/2025	
Shane Carriage	Thauaira	Joven Sanchez	Heritage Now	Email	2/05/2025	
Jason Mitchell	Thawun Aboriginal Consultancy	Joven Sanchez	Heritage Now	Email	2/05/2025	
John Allen	Thoorga Nura	Joven Sanchez	Heritage Now	Email	2/05/2025	

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Lynette Hartley	Turtle Dreaming	Joven Sanchez	Heritage Now	Email	2/05/2025	
Rodney & Barry Gunther	Waawaar Awaa Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Philip Boney	Wailwan Aboriginal Group	Joven Sanchez	Heritage Now	Email	2/05/2025	
Hika Te Kowhai	Walbunja	Joven Sanchez	Heritage Now	Email	2/05/2025	
Ronald Stewart	Walgalu	Joven Sanchez	Heritage Now	Email	2/05/2025	
Kelvin Boney	Wallanbah Aboriginal Site Conveyancing	Joven Sanchez	Heritage Now	Email	2/05/2025	
Joanne Timbery	Wallangang Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Hayley Bell	Wingikara	Joven Sanchez	Heritage Now	Email	2/05/2025	
Daniel Chalker	Wori Woonlywa	Joven Sanchez	Heritage Now	Email	2/05/2025	
Lee-Roy James Boota	Wullung	Joven Sanchez	Heritage Now	Email	2/05/2025	
Vicky & Kerrie Slater	Wurrumay Culture Heritage Consultants	Joven Sanchez	Heritage Now	Email	2/05/2025	
Scott Franks	Yarrawalk, on behalf of the Wonnarua PBC	Joven Sanchez	Heritage Now	Email	2/05/2025	
Robert Parson	Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	2/05/2025	
Kathleen Steward Kinchela	Yinarr Cultural Services	Joven Sanchez	Heritage Now	Email	2/05/2025	
Thomas Dahlstrom		Joven Sanchez	Heritage Now	Email	2/05/2025	
Pearl Depoma		Joven Sanchez	Heritage Now	Email	2/05/2025	
Gordon Morton	Darug Aboriginal Cultural Heritage Assessments	Holly Winter	Heritage Now	Mail	5/05/2025	

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Jamie Workman, Anna Workman, & Anna O'Hara	Darug Land Observations	Holly Winter	Heritage Now	Mail	5/05/2025	Did not send EOI by letter as both addresses have been RTS on other projects. Have notified Heritage NSW.
Barry Gunther	Heritage NSW	Holly Winter	Heritage Now	Email	5/05/2025	Seeking clarification regarding contact details for Darug Land Observations
Expressions of Interest Responses						
	Heritage Now	Daliah Aggrey-Fynn	Gandangara Local Aboriginal Land Council	Email	24/04/2025	Registered interest
	Heritage Now	Wendy Morgan	Guntawang Aboriginal Resources Incorporated	Email	2/05/2025	Registered interest
	Heritage Now	Paul Boyd	Didge Ngunawal Clan	Email	2/05/2025	Registered interest
	Heritage Now	Lynette Hartley	Turtle Dreaming	Email	2/05/2025	Registered interest
	Heritage Now	Darleen Johnson-Carroll	Murra Bidgee Mullangari Aboriginal Corporation	Email	2/05/2025	Registered interest
	Heritage Now	Lee Carroll	Meryhuiela	Email	2/05/2025	Registered interest
	Heritage Now	Kaarina Slater	Ngambaa Cultural Connections	Email	5/05/2025	Registered interest
	Heritage Now	Confidential RAP	Confidential RAP	Email	5/05/2025	Registered interest
	Heritage Now	Phil Khan	Kamilaroi Yankuntjatjara Working Group	Email	6/05/2025	Registered interest
	Heritage Now	Philip Boney	Wailwan Aboriginal Group	Email	6/05/2025	Registered interest
	Heritage Now	Jennifer Beale	Butucarbin Aboriginal Corporation	Email	7/05/2025	Registered interest
	Heritage Now	Ethan Trewlynn	Long Gully Cultural Services	Email	8/05/2025	Registered interest
	Heritage Now	Carolyn Hickey	A1 Indigenous Services	Email	24/05/2025	Registered interest
	Heritage Now	Amanda De Zwart	Amanda Hickey Cultural Services	Email	6/06/2025	Registered interest

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
	Heritage Now	Kathleen Steward Kinchela	Yinarr Cultural Services	Email	16/06/2025	Registered interest
	Heritage Now	Justine Coplin	Darug Custodian Aboriginal Corporation	Phone	29/07/2025	Registered interest. Discussed methodology, as it was near the end of the response period
Notification Letter						
Sir or Madam	Heritage NSW	Joven Sanchez	Heritage Now	Email	17/06/2025	
CEO	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	17/06/2025	
Methodology Letter sent						
Carolyn Hickey	A1 Indigenous Services	Joven Sanchez	Heritage Now	Email	3/07/2025	
Amanda De Zwart	Amanda Hickey Cultural Services	Joven Sanchez	Heritage Now	Email	3/07/2025	
Jennifer Beale	Butucarbin Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	3/07/2025	
Confidential RAP	Confidential RAP	Joven Sanchez	Heritage Now	Email	3/07/2025	
Paul Boyd & Lilly Carroll	Didge Ngunawal Clan	Joven Sanchez	Heritage Now	Email	3/07/2025	
Melissa Williams	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	3/07/2025	
Daliah Aggrey-Fynn	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	3/07/2025	
Wendy Morgan	Guntawang Aboriginal Resources Incorporated	Joven Sanchez	Heritage Now	Email	3/07/2025	
Phil Khan	Kamilaroi Yankuntjatjara Working Group	Joven Sanchez	Heritage Now	Email	3/07/2025	
Ethan Trewlynn	Long Gully Cultural Services	Joven Sanchez	Heritage Now	Email	3/07/2025	
Darleen Johnson-Carroll & Ryan Johnson	Murra Bidgee Mullangari Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	3/07/2025	

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Kaarina Slater	Ngambaa Cultural Connections	Joven Sanchez	Heritage Now	Email	3/07/2025	
Lynette Hartley	Turtle Dreaming	Joven Sanchez	Heritage Now	Email	3/07/2025	
Philip Boney	Wailwan Aboriginal Group	Joven Sanchez	Heritage Now	Email	3/07/2025	
Kathleen Steward Kinchela	Yinarr Cultural Services	Joven Sanchez	Heritage Now	Email	3/07/2025	
Lee Carroll	Meryhuiela	Joven Sanchez	Heritage Now	Email	3/07/2025	
Methodology Responses						
	Heritage Now	Paul Boyd	Didge Ngunawal Clan	Email	3/07/2025	Agreed with the methodology
	Heritage Now	Ethan Trewlynn	Long Gully Cultural Services	Email	4/07/2025	Agreed with the methodology
	Heritage Now	Lee Carroll	Meryhuiela	Email	15/07/2025	Agreed with the methodology
	Heritage Now	Wendy Morgan	Guntawang Aboriginal Resources Incorporated	Email	16/07/2025	Supported the survey methodology
	Heritage Now	Amanda De Zwart	Amanda Hickey Cultural Services	Email	20/07/2025	Supported the methodology
	Heritage Now	Darleen Johnson-Carroll	Murra Bidgee Mullangari Aboriginal Corporation	Email	22/07/2025	Endorsed the methodology
	Heritage Now	Phil Khan	Kamilaroi Yankuntjatjara Working Group	Email	1/08/2025	Identified that the study area is significant and sensitive to their people. Agreed and supported the methodology
Draft Report Sent for Review						
Carolyn Hickey	A1 Indigenous Services	Joven Sanchez	Heritage Now	Email	22/08/2025	
Amanda De Zwart	Amanda Hickey Cultural Services	Joven Sanchez	Heritage Now	Email	22/08/2025	
Jennifer Beale	Butucarbin Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	22/08/2025	
Confidential RAP	Confidential RAP	Joven Sanchez	Heritage Now	Email	22/08/2025	
Justine Coplin	Darug Custodian Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	22/08/2025	

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Paul Boyd & Lilly Carroll	Didge Ngunawal Clan	Joven Sanchez	Heritage Now	Email	22/08/2025	
Melissa Williams	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	22/08/2025	
Daliah Aggrey-Fynn	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	22/08/2025	
Wendy Morgan	Guntawang Aboriginal Resources Incorporated	Joven Sanchez	Heritage Now	Email	22/08/2025	
Phil Khan	Kamilaroi Yankuntjatjara Working Group	Joven Sanchez	Heritage Now	Email	22/08/2025	
Ethan Trewlynn	Long Gully Cultural Services	Joven Sanchez	Heritage Now	Email	22/08/2025	
Lee Carroll	Meryhuiela	Joven Sanchez	Heritage Now	Email	22/08/2025	
Darleen Johnson-Carroll & Ryan Johnson	Murra Bidgee Mullangari Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	22/08/2025	
Kaarina Slater	Ngambaa Cultural Connections	Joven Sanchez	Heritage Now	Email	22/08/2025	
Lynette Hartley	Turtle Dreaming	Joven Sanchez	Heritage Now	Email	22/08/2025	
Philip Boney	Wailwan Aboriginal Group	Joven Sanchez	Heritage Now	Email	22/08/2025	
Kathleen Steward Kinchela	Yinarr Cultural Services	Joven Sanchez	Heritage Now	Email	22/08/2025	
Reminder to respond						
Carolyn Hickey	A1 Indigenous Services	Joven Sanchez	Heritage Now	Email	12/09/2025	
Jennifer Beale	Butucarbin Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	12/09/2025	
Confidential RAP	Confidential RAP	Joven Sanchez	Heritage Now	Email	12/09/2025	
Paul Boyd & Lilly Carroll	Didge Ngunawal Clan	Joven Sanchez	Heritage Now	Email	12/09/2025	
Melissa Williams	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	12/09/2025	

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Daliah Aggrey-Fynn	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	12/09/2025	
Ethan Trewlynn	Long Gully Cultural Services	Joven Sanchez	Heritage Now	Email	12/09/2025	
Kaarina Slater	Ngambaa Cultural Connections	Joven Sanchez	Heritage Now	Email	12/09/2025	
Lynette Hartley	Turtle Dreaming	Joven Sanchez	Heritage Now	Email	12/09/2025	
Philip Boney	Wailwan Aboriginal Group	Joven Sanchez	Heritage Now	Email	12/09/2025	
Kathleen Steward Kinchela	Yinarr Cultural Services	Joven Sanchez	Heritage Now	Email	12/09/2025	
Responses to Draft Report						
	Heritage Now	Wendy Morgan	Guntawang Aboriginal Resources Incorporated	Email	25/08/2025	Supports the draft report
	Heritage Now	Justine Coplin	Darug Custodian Aboriginal Corporation	Email	28/08/2025	Agrees with the report recommendations
	Heritage Now	Darleen Johnson-Carroll	Murra Bidgee Mullangari Aboriginal Corporation	Email	28/08/2025	Endorses the recommendations
	Heritage Now	Lee Carroll	Meryhuiela	Email	31/08/2025	Agrees with the recommendations
	Heritage Now	Amanda De Zwart	Amanda Hickey Cultural Services	Email	3/09/2025	Supports the draft report
	Heritage Now	Phil Khan	Kamilaroi Yankuntjatjara Working Group	Email	11/09/2025	Supports the report and agrees with recommendations regarding native plants
	Heritage Now	Carolyn Hickey	A1 Indigenous Services	Email	12/09/2025	Supports the draft report
Final Report Sent Out						
Carolyn Hickey	A1 Indigenous Services	Joven Sanchez	Heritage Now	Email	17/10/2025	
Amanda De Zwart	Amanda Hickey Cultural Services	Joven Sanchez	Heritage Now	Email	17/10/2025	
Jennifer Beale	Butucarbin Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	17/10/2025	

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Confidential RAP	Confidential RAP	Joven Sanchez	Heritage Now	Email	17/10/2025	
Justine Coplin	Darug Custodian Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	17/10/2025	
Paul Boyd & Lilly Carroll	Didge Ngunawal Clan	Joven Sanchez	Heritage Now	Email	17/10/2025	
Melissa Williams	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	17/10/2025	
Daliah Aggrey- Fynn	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	17/10/2025	
Wendy Morgan	Guntawang Aboriginal Resources Incorporated	Joven Sanchez	Heritage Now	Email	17/10/2025	
Phil Khan	Kamilaroi Yankuntjatjara Working Group	Joven Sanchez	Heritage Now	Email	17/10/2025	
Ethan Trewlynn	Long Gully Cultural Services	Joven Sanchez	Heritage Now	Email	17/10/2025	
Lee Carroll	Meryhuila	Joven Sanchez	Heritage Now	Email	17/10/2025	
Darleen Johnson- Carroll & Ryan Johnson	Murra Bidgee Mullangari Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	17/10/2025	
Kaarina Slater	Ngambaa Cultural Connections	Joven Sanchez	Heritage Now	Email	17/10/2025	
Lynette Hartley	Turtle Dreaming	Joven Sanchez	Heritage Now	Email	17/10/2025	
Philip Boney	Wailwan Aboriginal Group	Joven Sanchez	Heritage Now	Email	17/10/2025	
Kathleen Steward Kinchela	Yinarr Cultural Services	Joven Sanchez	Heritage Now	Email	17/10/2025	
Updated Final Report Sent Out						
Carolyn Hickey	A1 Indigenous Services	Joven Sanchez	Heritage Now	Email	30/10/2025	
Amanda De Zwart	Amanda Hickey Cultural Services	Joven Sanchez	Heritage Now	Email	30/10/2025	
Jennifer Beale	Butucarbin Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	30/10/2025	

Aboriginal Consultation Log

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/response
Confidential RAP	Confidential RAP	Joven Sanchez	Heritage Now	Email	30/10/2025	
Justine Coplin	Darug Custodian Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	30/10/2025	
Paul Boyd & Lilly Carroll	Didge Ngunawal Clan	Joven Sanchez	Heritage Now	Email	30/10/2025	
Melissa Williams	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	30/10/2025	
Daliah Aggrey- Fynn	Gandangara Local Aboriginal Land Council	Joven Sanchez	Heritage Now	Email	30/10/2025	
Wendy Morgan	Guntawang Aboriginal Resources Incorporated	Joven Sanchez	Heritage Now	Email	30/10/2025	
Phil Khan	Kamilaroi Yankuntjatjara Working Group	Joven Sanchez	Heritage Now	Email	30/10/2025	
Ethan Trewlynn	Long Gully Cultural Services	Joven Sanchez	Heritage Now	Email	30/10/2025	
Lee Carroll	Meryhuila	Joven Sanchez	Heritage Now	Email	30/10/2025	
Darleen Johnson- Carroll & Ryan Johnson	Murra Bidgee Mullangari Aboriginal Corporation	Joven Sanchez	Heritage Now	Email	30/10/2025	
Kaarina Slater	Ngambaa Cultural Connections	Joven Sanchez	Heritage Now	Email	30/10/2025	
Lynette Hartley	Turtle Dreaming	Joven Sanchez	Heritage Now	Email	30/10/2025	
Philip Boney	Wailwan Aboriginal Group	Joven Sanchez	Heritage Now	Email	30/10/2025	
Kathleen Steward Kinchela	Yinarr Cultural Services	Joven Sanchez	Heritage Now	Email	30/10/2025	

Appendix 2 AHIMS Search Results

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : HN1460-A

Client Service ID : 1099869

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
45-5-2450	PP1	AGD	56	314230	6239390	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	Mr.Michael Therin							
45-5-2448	PP1	AGD	56	314230	6239390	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders	ASRSYS							
45-6-0536	Alford's Point A;Precinct 9 Alfords Point;	GDA	56	317198	6238149	Closed site	Valid	Artefact : -, Art (Pigment or Engraved) : -	Shelter with Art,Shelter with Deposit	
	Contact	Recorders	Elizabeth Rich,Doctor.Susan (left ahms) McIntyre-Tamwoy							
45-5-1058	Voyager Point ISF 1;VP ISF1;	AGD	56	312240	6239910	Open site	Valid	Artefact : -	Isolated Find	
	Contact	Recorders	Doctor.Jo McDonald,Elizabeth Rich							
45-5-1059	Voyager Point ISF 2;VP ISF2;	AGD	56	312210	6240050	Open site	Valid	Artefact : -	Isolated Find	
	Contact	Recorders	Doctor.Jo McDonald,Elizabeth Rich							
45-5-1060	Voyager Point ISF 3;VP ISF3;	GDA	56	312633	6239938	Open site	Valid	Artefact : -	Isolated Find	
	Contact	Recorders	Doctor.Jo McDonald,Elizabeth Rich							
45-5-1061	Voyager Point ISF 4;VP ISF4;	AGD	56	312450	6239690	Open site	Valid	Artefact : -	Isolated Find	
	Contact	Recorders	Doctor.Jo McDonald,Elizabeth Rich							
45-6-0600	Yeramba Reserve	AGD	56	317701	6239002	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
	Contact	Recorders	Mr.David Gordon							
45-6-0601	East Hill;Sandaken Road;	AGD	56	317130	6239500	Open site	Valid	Grinding Groove : -	Axe Grinding Groove	1276
	Contact	Recorders	ASRSYS							
45-6-0602	Henry Lawson Drive	AGD	56	317964	6239556	Closed site	Valid	Artefact : -, Art (Pigment or Engraved) : -	Shelter with Art,Shelter with Deposit	1276
	Contact	Recorders	ASRSYS							
45-6-0537	Alford's Point B	AGD	56	317646	6238200	Closed site	Valid	Artefact : -	Shelter with Deposit	
	Contact	Recorders	Elizabeth Rich,Doctor.Susan (left ahms) McIntyre-Tamwoy							
45-5-0337	Greenwood 1;Freeway No.5;	AGD	56	311800	6241530	Open site	Valid	Artefact : -	Open Camp Site	260,824,1018,2132
	Contact	Recorders	F Cain,Ms.Laila Haglund							
45-5-0971	WG03-2	AGD	56	310430	6239900	Open site	Valid	Artefact : -	Open Camp Site	2826
	Contact	Recorders	Philip Boot							
45-5-0972	WG03-1	AGD	56	310620	6239950	Open site	Valid	Artefact : -	Open Camp Site	2826
	Contact	Recorders	Philip Boot							
45-6-2470	None Specified	AGD	56	317850	6240650	Closed site	Valid	Artefact : -, Art (Pigment or Engraved) : -, Grinding Groove : -	Axe Grinding Groove,Shelter with Art,Shelter with Deposit	

Report generated by AHIMS Web Service on 09/03/2026 for Jacqueline Chua for the following area at Datum :GDA, Zone : 56, Eastings : 309895.0 - 318895.0, Northings : 6238125.0 - 6247125.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 80

This information is not guaranteed to be free from error omission. Heritage NSW and its employees disclaim liability for any act done or omission made on the information and consequences of such acts or omission.

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
	<u>Contact</u>	<u>Recorders</u>	Gary Dunnett					<u>Permits</u>		
45-6-2471	None Specified	AGD	56	317850	6240700	Closed site	Valid	Artefact : -, Art (Pigment or Engraved) : -, Grinding Groove : -	Axe Grinding Groove,Shelter with Art,Shelter with Deposit	
	<u>Contact</u>	<u>Recorders</u>	Gary Dunnett					<u>Permits</u>		
45-5-2344	Holsworthy IF 4;	AGD	56	311200	6240380	Open site	Destroyed	Artefact : -	Isolated Find	
	<u>Contact</u>	<u>Recorders</u>	Mrs.Robynne Mills					<u>Permits</u>		
45-5-2345	Holsworthy IF 2,3;	AGD	56	311900	6240480	Open site	Valid	Artefact : -	Isolated Find	
	<u>Contact</u>	<u>Recorders</u>	Mrs.Robynne Mills					<u>Permits</u>		
45-5-2346	Holsworthy IF 1;	AGD	56	311810	6240410	Open site	Valid	Artefact : -	Isolated Find	
	<u>Contact</u>	<u>Recorders</u>	Mrs.Robynne Mills					<u>Permits</u>		
52-2-1786	Moore Reserve Shelter;MRS;	AGD	56	312328	6238600	Closed site	Valid	Artefact : -, Art (Pigment or Engraved) : -, Grinding Groove : -	Axe Grinding Groove,Rock Engraving,Shelter with Art,Shelter with Deposit	
	<u>Contact</u>	<u>Recorders</u>	Bobbie Oakley					<u>Permits</u>		
45-6-2016	Georges R.S.R.A.;	AGD	56	315707	6238003	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	1333
	<u>Contact</u>	<u>Recorders</u>	Warren Bluff					<u>Permits</u>		
45-5-2355	WGO 3-1; (duplicate copy 45-5-0972)	AGD	56	310620	6239950	Open site	Valid	Artefact : -	Open Camp Site	
	<u>Contact</u>	<u>Recorders</u>	Philip Boot					<u>Permits</u>		
45-5-2369	WGO3-2;(REFER TO 45-5-0971)	AGD	56	310430	6239900	Open site	Valid	Artefact : -	Open Camp Site	
	<u>Contact</u>	<u>Recorders</u>	Philip Boot					<u>Permits</u>		
45-5-2371	VP3;Voyager Pt. 3;	AGD	56	312240	6239800	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	3561
	<u>Contact</u>	<u>Recorders</u>	Doctor.Jo McDonald,Elizabeth Rich					<u>Permits</u>		
45-5-2372	VP1;Voyager Pt. 1;	AGD	56	312240	6239730	Open site	Valid	Shell : -, Artefact : -	Midden	3561
	<u>Contact</u>	<u>Recorders</u>	Doctor.Jo McDonald,Elizabeth Rich					<u>Permits</u>	1095	
45-5-2373	VP2;Voyager Pt. 2;	AGD	56	312240	6239780	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	3561
	<u>Contact</u>	<u>Recorders</u>	Doctor.Jo McDonald,Elizabeth Rich					<u>Permits</u>		
45-6-1787	ST George S.R.A. ;	AGD	56	317490	6238186	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
	<u>Contact</u>	<u>Recorders</u>	Warren Bluff					<u>Permits</u>		

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : HN1460-A

Client Service ID : 1099869

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
45-6-1788	GKW 10 - St George, SRA	GDA	56	317682	6238415	Open site	Valid	Art (Pigment or Engraved) : -, Shell : -, Artefact : -	Shelter with Midden	
	Contact	Recorders	Warren Bluff,Sutherland Shire Council,Mr.Graham Avery					Permits		
45-6-1798	ST George S.R.A.;	AGD	56	317049	6238299	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
	Contact	Recorders	Warren Bluff,P Price					Permits		
45-6-1799	ST George S.R.A.;	AGD	56	317130	6238220	Closed site	Valid	Artefact : -	Shelter with Deposit	1333
	Contact	Recorders	Warren Bluff,P Price					Permits		
45-6-1800	St George S.R.A.;	AGD	56	317350	6238150	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
	Contact	Recorders	Warren Bluff,P Price					Permits		
45-5-0837	Toll Plaza Site 1;TPS 1;	AGD	56	311900	6241580	Open site	Valid	Artefact : -	Open Camp Site	2132
	Contact	Recorders	F Cain					Permits		
45-6-1842	Blackwall Rock;	AGD	56	315516	6238050	Open site	Valid	Shell : -, Artefact : -	Midden	1333
	Contact	Recorders	Warren Bluff					Permits		
45-6-1009	Georges River;Plundered Cave;	AGD	56	316792	6238710	Closed site	Valid	Art (Pigment or Engraved) : -, Shell : -, Artefact : -	Shelter with Art,Shelter with Midden	105230
	Contact	Recorders	ASRSYS					Permits		
45-6-1010	Georges River;Henry Lawson Cave;	AGD	56	316870	6238840	Closed site	Valid	Shell : -, Artefact : -	Shelter with Midden	
	Contact	Recorders	ASRSYS					Permits		
45-6-1011	White Hand, White Shoe Cave	AGD	56	318256	6238647	Closed site	Valid	Art (Pigment or Engraved) : -, Shell : -, Artefact : -	Shelter with Art,Shelter with Midden	
	Contact	Recorders	ASRSYS					Permits		
45-3-1787	GKW 50 - White Hands Near Alfords Point	GDA	56	317599	6238389	Open site	Valid	Art (Pigment or Engraved) : -, Grinding Groove : -, Shell : -	Shelter with Art	
	Contact	Recorders	Warren Bluff,Sutherland Shire Council,Mr.Graham Avery					Permits		
45-5-2645	HCRST2	GDA	56	313450	6239110	Open site	Destroyed	Modified Tree (Carved or Scarred) : -		
	Contact	Recorders	Jeff Thomas,MCH - McCardle Cultural Heritage Pty Ltd,Doctor.Penny Mccardle					Permits		
45-6-1789	Georges River S.R.A .	AGD	56	317837	6238212	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
	Contact	Recorders	Warren Bluff					Permits		

Report generated by AHIMS Web Service on 09/03/2026 for Jacqueline Chua for the following area at Datum :GDA, Zone : 56, Eastings : 309895.0 - 318895.0, Northings : 6238125.0 - 6247125.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 80

This information is not guaranteed to be free from error omission. Heritage NSW and its employees disclaim liability for any act done or omission made on the information and consequences of such acts or omission.

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : HN1460-A

Client Service ID : 1099869

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
45-5-3208	SPL 1	AGD	56	311954	6241094	Open site	Valid	Artefact : 5, Potential Archaeological Deposit (PAD) : 1		
	<u>Contact</u> Searle	<u>Recorders</u> Doug Binns						<u>Permits</u>	2501	
45-5-3209	SPL 2	AGD	56	313051	6241800	Open site	Valid	Modified Tree (Carved or Scarred) : 2		
	<u>Contact</u> Searle	<u>Recorders</u> Biosis Pty Ltd - Sydney						<u>Permits</u>		
45-5-3210	SPL 3	AGD	56	313187	6241793	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		
	<u>Contact</u> Searle	<u>Recorders</u> Biosis Pty Ltd - Sydney						<u>Permits</u>		
45-6-1786	Georges River S.R.A .	AGD	56	318335	6238314	Closed site	Valid	Art (Pigment or Engraved) : -	Shelter with Art	
	<u>Contact</u>	<u>Recorders</u> Warren Bluff						<u>Permits</u>		
45-6-2899	GKW30 (Art Site East of Casuarina Rd) Botany Bay	GDA	56	317500	6238324	Closed site	Valid	Art (Pigment or Engraved) : -, Artefact : -		
	<u>Contact</u>	<u>Recorders</u> Kelleher Nightingale Consulting Pty Ltd,Kelleher Nightingale Consulting Pty Ltd,Mi						<u>Permits</u>		
45-6-2903	GKW40 (Shelter Behind Bracken Fern) Botany Bay	GDA	56	317869	6238422	Open site	Valid	Artefact : -		
	<u>Contact</u>	<u>Recorders</u> Kelleher Nightingale Consulting Pty Ltd						<u>Permits</u>		
45-6-2904	GKW50 (White Hand) Botany Bay	GDA	56	317583	6238376	Closed site	Valid	Art (Pigment or Engraved) : -, Shell : -, Artefact : -		
	<u>Contact</u>	<u>Recorders</u> Kelleher Nightingale Consulting Pty Ltd,Kelleher Nightingale Consulting Pty Ltd,Mi						<u>Permits</u>		
45-5-0257	Liverpool Chipping Norton	AGD	56	310540	6245081	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	260,1018,1021 96
	<u>Contact</u>	<u>Recorders</u> David Bell						<u>Permits</u>		
45-5-4155	DCAS 1	GDA	56	314440	6238135	Open site	Valid	Artefact : 13		
	<u>Contact</u>	<u>Recorders</u> Kelleher Nightingale Consulting Pty Ltd,Mr.Josh Symons						<u>Permits</u>		
45-5-4303	New Brighton Isolated Find	GDA	56	312347	6241606	Open site	Valid	Artefact : 1		
	<u>Contact</u>	<u>Recorders</u> Ms.Fenella Atkinson						<u>Permits</u>	3623,3628	
45-5-4814	Scar Tree 11	GDA	56	312550	6242220	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u> AHIMS APP Users,Doctor.Paul Wynn						<u>Permits</u>		
45-5-4816	Scar Tree 8	GDA	56	312672	6242236	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u> AHIMS APP Users,Doctor.Paul Wynn						<u>Permits</u>		

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : HN1460-A

Client Service ID : 1099869

<u>SiteID</u>	<u>SiteName</u>	<u>Datum</u>	<u>Zone</u>	<u>Easting</u>	<u>Northing</u>	<u>Context</u>	<u>Site Status **</u>	<u>SiteFeatures</u>	<u>SiteTypes</u>	<u>Reports</u>
45-5-4817	Scar Tree 9	GDA	56	312672	6242225	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-6-3318	GKW 40 - Shelter Behind Bracken Fern near Alford's Point Bridge (duplicate of 45-6-2903)	GDA	56	317869	6238422	Open site	Valid	Shell : -		
	<u>Contact</u>	<u>Recorders</u>	Sutherland Shire Council,Mr.Graham Avery					<u>Permits</u>		
45-5-4819	Riverlands Scar Tree 7	GDA	56	312704	6242251	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4822	Riverlands Scar Tree 1	GDA	56	312771	6242427	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4823	Riverlands Scar Tree 2	GDA	56	312770	6242434	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4824	Riverlands Scar Tree 3	GDA	56	312759	6242392	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4825	Riverlands Scar Tree 4	GDA	56	312750	6242402	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4826	Riverlands Scar Tree 5	GDA	56	312745	6242310	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4827	Riverlands Scar Tree 6	GDA	56	312736	6242256	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4828	Riverlands Scar Tree 13	GDA	56	312722	6242511	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4829	Riverlands Scar Tree 12	GDA	56	312732	6242569	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : HN1460-A

Client Service ID : 1099869

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4830	Riverlands Scar Tree 14	GDA	56	312718	6242459	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4831	Riverlands Scar Tree 15	GDA	56	312712	6242455	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-4832	Riverlands Scar Tree 16	GDA	56	312649	6242331	Open site	Not a Site	Modified Tree (Carved or Scarred) : -		103636
	<u>Contact</u>	<u>Recorders</u>	AHIMS APP Users,Doctor.Paul Wynn					<u>Permits</u>		
45-5-5192	Shell Midden OPTRd	AGD	56	310203	6244869	Open site	Valid	Shell : 1		
	<u>Contact</u>	<u>Recorders</u>	Doctor.Penny Mccardle					<u>Permits</u>		
45-5-5193	wiley pk cnr canterbuty and king georges	GDA	56	314013	6240763	Open site	Valid	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	Bankstown Bushland Society,Mr.Chris Brogan					<u>Permits</u>		
45-5-5124	HLD Resource Zone 1 + PAD	GDA	56	312924	6244624	Open site	Valid	Aboriginal Resource and Gathering : -, Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	GML Heritage Pty Ltd - Surry Hills,Doctor.Tim Owen					<u>Permits</u>		
45-5-5125	HLD Site 5 (IF)	GDA	56	313732	6243856	Open site	Not a Site	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	GML Heritage Pty Ltd - Surry Hills,Doctor.Tim Owen,Mr.Matthew Kelleher,Kelleher					<u>Permits</u>		
45-5-5114	HLD Site 4 (AS+PAD)	GDA	56	312878	6247057	Open site	Valid	Artefact : -, Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	GML Heritage Pty Ltd - Surry Hills,Doctor.Tim Owen					<u>Permits</u>		
45-5-5119	HLD Site 1 (AS+PAD)	GDA	56	312985	6246882	Open site	Valid	Artefact : -, Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	GML Heritage Pty Ltd - Surry Hills,Doctor.Tim Owen					<u>Permits</u>		
45-5-5120	HLD PAD 3	GDA	56	313363	6246462	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	GML Heritage Pty Ltd - Surry Hills,Doctor.Tim Owen					<u>Permits</u>		
45-5-5121	HLD PAD 4	GDA	56	313291	6246031	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>	<u>Recorders</u>	GML Heritage Pty Ltd - Surry Hills,Doctor.Tim Owen					<u>Permits</u>		

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : HN1460-A

Client Service ID : 1099869

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
45-5-5122	HLD PAD 5	GDA	56	312899	6244709	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	GML Heritage Pty Ltd - Surry Hills,Doctor.Tim Owen							Permits
45-5-5123	HLD PAD 6	GDA	56	313097	6244334	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	GML Heritage Pty Ltd - Surry Hills,Doctor.Tim Owen							Permits
45-5-5109	Sirius Rd Midden - (NOT AN ABORIGINAL SITE)	GDA	56	313175	6240405	Open site	Not a Site	Shell : 1		103915
	Contact	Recorders	Ms.Tory Stening,Unearthed Archaeology & Heritage							Permits 4501
45-5-5286	Riverlands Golf Course PAD	GDA	56	312705	6242392	Open site	Not a Site	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	Artefact Heritage and Environment - Pyrmont,Artefact Heritage and Environment -							Permits
45-5-5334	RGC2020-AS01	GDA	56	312644	6242602	Open site	Valid	Artefact : -		
	Contact	Recorders	Artefact Heritage and Environment - Pyrmont,Mr.Ryan Taddeucci							Permits 5014
45-5-5756	HB-IA1-21	GDA	56	309951	6239126	Open site	Valid	Artefact : -		
	Contact	Recorders	EMM Consulting - Individual users,Miss.Amber Morgan							Permits
45-5-6002	Brighton Lakes AFT1	GDA	56	311425	6242604	Open site	Valid	Artefact : -		
	Contact	Recorders	Heritage Now - Belmont,Miss.Tiffany Jones							Permits

** Site Status

Valid - The site has been recorded and accepted onto the system as valid

Destroyed - The site has been completely impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There is nothing left of the site on the ground but proponents should proceed with caution.

Partially Destroyed - The site has been only partially impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There might be parts or sections of the original site still present on the ground

Not a site - The site has been originally entered and accepted onto AHIMS as a valid site but after further investigations it was decided it is NOT an aboriginal site. Impact of this type of site does not require permit but Heritage NSW should be notified

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Appendix 3 Childcare Centre Due Diligence Report



**PEOPLE
CENTRED
HERITAGE**

17 October 2025

Attention: Jerome Guinto, Project Manager
Beveridge Williams
Level 4, LPC House, Suite 4.05
3 Fordham Way, Oran Park NSW 2570

Dear Jerome,

Western Sydney University, Milperra, Childcare Centre– Aboriginal Heritage Due Diligence Assessment

Extent Heritage Pty Ltd has been engaged by Beveridge Williams on behalf of Mirvac Residential (NSW) Pty Ltd to prepare a Due Diligence (DD) for the staged residential development of the former Western Sydney University (WSU) Milperra Campus (hereafter referred to as the 'site') located at 2 and 2A Bullecourt Avenue, Milperra.

This report is submitted in support of the State Significant Development Application (SSDA) for the proposed development. It addresses the Secretary's Environmental Assessment Requirements (SEARs) regarding Aboriginal cultural heritage. Extent Heritage was engaged to address only Stage 3A and 3B of the development. We note that due to extension of the study area to include the road reserves in July 2025, this area was not included in our site inspection and has been assessed via desktop assessment only. We note that an Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared for the wider site and will also be submitted with the SSDA.

This report identifies:

- whether or not there are any current Aboriginal heritage compliance requirements or permit approvals required under the *NSW National Parks and Wildlife Act 1974* and related Heritage NSW regulations, codes and guidelines;
- any known approvals required under the federal *Environmental Protection & Biodiversity Conservation Act 1999* or the *Aboriginal & Torres Strait Islander Heritage Protection Act 1984*; and
- any other Aboriginal heritage risks we have identified with respect to the study area and the proposed development works.

The due diligence assessment identified no registered Aboriginal Objects or Places present within the study area.

In accordance with the risk management process set out in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW, 2010) the due diligence assessment concluded that that proposed development works can currently 'proceed with caution'. No Aboriginal Heritage

EXTENT HERITAGE PTY LTD
ABN 24 608 666 306
ACN 608 666 306
extent.com.au

SYDNEY
Level 3/73 Union St
Pyrmont
T 02 9555 4000

MELBOURNE
Level 1, 52 Holmes St
Brunswick East
T 03 9388 0622

BRISBANE
Level 2, 109 Edward St
Brisbane
T 07 3051 0171

HOBART
Level 3, 85 Macquarie St
Hobart
T 03 6144 5880



Impact Permit approvals are currently required for the Stage 3A and 3B of the proposed development. We note that an Aboriginal Cultural Heritage Assessment Report ACHAR has been prepared by Heritage Now for the wider development and will be submitted with the SSDA.

Please feel free to contact me to discuss the findings of our assessment should you have any questions or require further information.

Yours sincerely,

Sarah Janson
Associate | Extent Heritage

1. INTRODUCTION

1.1. Legislative Protection for Aboriginal Heritage in NSW

All Aboriginal objects and places are protected in NSW under the *National Parks and Wildlife Act 1974*.

All 'Aboriginal objects' and 'places' are protected in NSW under the *National Parks and Wildlife Act 1974*.

Under Section 86 of the Act, it is an offence to 'harm or desecrate' an 'Aboriginal object' or 'Aboriginal place' without an appropriate approval.

An 'Aboriginal object' is defined by the Act as:

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

An 'Aboriginal place' is defined by the Act as:

any place declared to be an Aboriginal place under section 84 (i.e. a gazetted place).

'Harm' excludes 'trivial or negligible' damage but is otherwise widely defined by the Act to mean 'any act or omission that':

- (a) destroys, defaces or damages the object or place, or*
- (b) in relation to an object—moves the object from the land on which it had been situated, or*
- (c) is specified by the regulations, or*
- (d) causes or permits the object or place to be harmed in a manner referred to in paragraph (a), (b) or (c).*

An offence under Section 86 of the *National Parks and Wildlife Act 1974* could result in prosecution and significant penalties.

Heritage NSW has established a series of regulations, codes and guidelines as a framework for managing Aboriginal heritage in NSW. The staged risk management process can be summarised in the following steps:

1. Any proposed activity that may cause harm to known Aboriginal Objects or Places (as defined by the *National Parks and Wildlife Act 1974*) will require an Aboriginal Heritage Impact Permit

- (AHIP) approval prior to commencement of that activity. Harm means desecrating, destroying, defacing, damaging or moving an Aboriginal object or declared Aboriginal Place.
2. An ACHAR must be completed in support of an AHIP application to Heritage NSW, if required.
 3. There are a series of defences to prosecution available for 'low impact activities' under Section 58 of the *National Parks and Wildlife Regulation 2019*. These low impact exemptions are applicable only in areas that do not contain known Aboriginal Objects or gazetted Aboriginal Places.
 4. *The Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW, 2010) provides risk-based guidance regarding when an ACHAR should be prepared in advance of a development proposal. The risk-based process is based around identification of projects that are 'likely' to harm Aboriginal Objects or Places.

There are Commonwealth Government heritage compliance obligations under the *Environmental Protection and Biodiversity Conservation (EPBC) Act 1999* and the *Aboriginal and Torres Strait Islander Heritage Protection (ATSHPA) Act 1984* that fall outside the NSW state heritage management framework.

While most projects are not affected by commonwealth requirements, there has been an increasing application of the commonwealth legislation over the last ten years and therefore this due diligence assessment includes identification of any commonwealth requirements that may apply to the project.

1.2. Project summary

Extent Heritage was commissioned by Beveridge Williams, on behalf of Mirvac, to undertake an Aboriginal heritage due diligence assessment for proposed Stage 3A and 3B works associated with a childcare centre at the Western Sydney University Campus, Milperra, within the Canterbury-Bankstown Local Government Area (LGA). The study area is located within the boundaries of Gandangara Local Aboriginal Land Council (LALC).

We understand the study area is located at Lot 2, DP1291984, 2 & 2A Bullecourt Avenue, Western Sydney University, Milperra, and is approximately 28,000 m² in size. The study area presently contains a childcare centre, parking, grassed area, water storage tanks, a hydrant pump building, and roads (Figure 2). The study area is bound by an environmental conservation area to the north and east, with internal access roads to the west and south (Figure 3). Stage 3A and 3B form part of a wider subdivision project for the former WSU Milperra campus. We note that that due to extension of the study area to include the road reserves in May 2025, this area was not included in our site inspection and has been assessed via desktop assessment only.

For the wider subdivision, the site is currently owned by Western Sydney University and is located within the Canterbury Bankstown LGA at 2 and 2A Bullecourt Avenue, Milperra, being legally described as Lot 2 in DP1291984 and Lot 1 in DP101147 (refer Figure 1).

The total site has an area of approximately 19.64ha and is the subject of numerous easements affecting the site, including two easements to drain water, easements for electricity and other purposes, and a right of carriageway.



 THE SITE

NOT TO SCALE 

Figure 1. Project area.

Since the demolition of the previous buildings on the site, the site currently comprises:

- Existing at-grade car park (within Zone 4) repurposed as parking and hardstand area for the temporary sales office.
- Existing at-grade car park for the Childcare Centre (generally within the location of the future Road 2B).
- At-grade roads off Bullecourt Avenue.
- A large oval to the south.
- The Western Sydney University Early Learning Centre (Child-care centre).
- Vegetation of varying significance, including Cumberland Plain Woodland.

The site is bound by the M5 Motorway to the south, Ashford Avenue / existing residential dwellings to the west, Bullecourt Avenue / existing industrial development to the north, and Horsley Road / existing industrial development to the east. Adjoining the site along the southeastern boundary is Mount St Joseph Catholic College.

We understand the DCP (Development Control Plan) controls for 3.9 Heritage C1 states: *'for all residential subdivisions or developments on lands adjacent to or lands containing a C2 Environmental*

Conservation zone, an Aboriginal Cultural Heritage Assessment (ACHA)¹ must be prepared prior to any ground disturbances in the area.'

The study area is immediately adjacent to the C2 Environmental Conservation zone (Figure 4); however, an Aboriginal heritage due diligence assessment has been prepared in the first instance to address the investigative and legal requirements of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW, 2010), which provides risk-based guidance regarding when an ACHAR should be prepared and potential impacts to Aboriginal objects or places. We understand that an ACHAR has been prepared by Heritage Now to address the impacts of the proposed development on Aboriginal cultural heritage within the wider development site and is to be considered as part of the SSDA in conjunction with this assessment once completed.

The project will be delivered in stages and across two separate SSDA Projects, and comprises the construction of up to 430 dwellings, three (3) public parks, new roads and shared paths, civil infrastructure, a car park, and the management of conservation land.

Specifically, across the two SSDAs, consent is sought for:

- Tree removal
- Site remediation (excluding works carried out as category 2 remediation works)
- Construction of bulk earthworks, public roads and landscaping, and services
- Augmentation of existing services and road infrastructure
- Construction of three (3) public parks
- Construction of up to 430 dwelling houses
- Construction of a carpark to service the existing childcare centre and E1 Local Centre zoned land
- Subdivision resulting in up to 430 residential lots, infrastructure lots, and the creation of a community title lot for land zoned C2 Environmental Conservation and E1 Local Centre
- Conservation works including the management of >2Ha Cumberland Plain Woodland Species.

This SSDA comprises of all Civil works across the entirety of the site as well as the construction of all 62 dwellings in Stages 1 and 2 only, which are as follows:

- Stage 1 – Commencement of site-wide tree removal and land remediation, creation of two (2) super lots and total of 22 residential lots, and construction of 22 dwelling houses fronting Ashford Avenue. This will be the first stage to be delivered and will connect into the existing infrastructure that located within Ashford Avenue.
- Stage 2 – Creation of four (4) super lots, a new lot (Lot 25) across the RE1 Public Recreation zoned land, and 40 residential lots. This stage also involves the construction of 40 dwellings within Stage 2, and the construction of new roads and the new public park referred to in the Civil Plans as the 'Central Park'.

¹ N.B. also referred to as an Aboriginal Cultural Heritage Assessment Report (ACHAR)

- Stage 3a – Creation of a new super lot, and the construction of perimeter roads surrounding the existing childcare centre, construction of a new car park to service the childcare centre and C2 Environmental Conservation zoned land. It is proposed all associated civil works required to enable the operation of the existing childcare centre will be delivered under this stage. The new traffic intersections at both Bullecourt Avenue and Horsley Road will be constructed.
- Stage 3b – Creation of three (3) lots to be delivered under a Community Title Scheme for the E1 Local Centre zoned land.
- Stage 4 – Creation of eight (8) super lots, a new lot (Lot 50) across the RE1 Public Recreation zoned land, and a new lot (Lot 49) across the SP2 Infrastructure zoned land. This stage also involves the construction of new roads, the stormwater infrastructure Basin 1 and Basin 2, and the new public park referred to in the Civil Plans as the 'Southern Park', all to be dedicated to Council.
- Stage 5 – Creation of six (6) super lots and construction of new roads and civil works.
- Stage 6 – Creation of nine (9) super lots and a new lot (70) across the RE1 Public Recreation zoned land. This stage also involves the construction of new roads and civil works, and the new public park referred to in the Civil Plans as the 'Northern Park', all to be dedicated to Council.
- Stage 7 – Creation of six (6) super lots and construction of road and civil works.

The second SSDA will seek consent for all outstanding works in stages 3 to 7, which are as follows:

- Stage 3 – Construction of the Childcare Alterations and Additions and Construction of a permanent structure for Commercial use.
- Stage 4, 5, 6 & 7 – Creation of the subsequent subdivision into residential lots and construction of dwellings.

This Aboriginal heritage assessment addresses only the proposed works associated with Stages 3A and 3B (Figure 5 and Figure 6).

1.3. Scope of work

The due diligence assessment scope of work included:

1. Search of the Heritage NSW Aboriginal Heritage Information Management System (AHIMS) to identify whether or not there are any known Aboriginal Objects, Places, potential archaeological deposits (PADs) or other site recordings within the study area;

2. Search of the World, National and Commonwealth heritage lists under the EPBC Act, a search of the Commonwealth Government Gazette for any relevant Declarations under the ATSIHPA, and a search of the NSW State Heritage Register (SHR);
3. Desktop review of key regional Aboriginal heritage studies and any previous studies in the study area to understand local Aboriginal site patterning and implications for archaeological potential within the study area. The desktop review also sought to identify any previously documented Aboriginal cultural, social or intangible values that may be relevant to the study area;
4. Desktop review of geological mapping, soil landscape mapping, NearMap high resolution aerial photographs and historical aerial photographs of the study area to identify landforms and environmental features within the study area. The review also sought to identify previous disturbance and landscape modifications that have occurred within the study area that may have affect its archaeological potential;
5. Site inspection to identify any Aboriginal sites visible on current exposed ground surfaces and any old growth native trees with potential to retain cultural scars or carving. The site inspection also included documentation of previous ground disturbance and modification; and
6. Identification of whether or not permit approvals or further ACHAR assessment is required in accordance with the risk assessment processes set out in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW, 2010).

1.4. Limitations

The due diligence assessment is not a formal Aboriginal Cultural Heritage Assessment Report and cannot be used to support Aboriginal Heritage Impact Permit applications to Heritage NSW. It did not include detailed field investigations, test excavation or complete formal community consultation with Registered Aboriginal Parties.

The assessment is limited to advice regarding Aboriginal heritage risks and compliance requirements. It does not include consideration of risks that may be associated with historical archaeology, built and urban heritage, maritime heritage, locally listed heritage schedule items, Native Title or landscape heritage.

Reconfiguration of the study area and associated impacts were implemented after the site inspection was conducted, therefore, portions of the development, primarily the roadways, have not been physically inspected. Archaeological potential was determined through desktop assessment only for these areas.

The recommendations and mitigation measures developed as part of the ACHAR (Heritage Now, 2025) for the proposed development may supersede this assessment.



The advice in the due diligence assessment is based on relevant Aboriginal heritage site register searches, desktop research, site inspection, preliminary Aboriginal stakeholder consultation and identification of any heritage constraints, risks and permit approval requirements.

1.5. Authorship

This report was written by Extent Heritage Pty Ltd. Gina Basile (Heritage Advisor) was the primary author and researcher with contributions by Catherine Fenech (Heritage Advisor). Dr Richard Tuffin (GIS Specialist) assisted with mapping and spatial analysis work. Sarah Janson (Associate) contributed to the report and completed the technical and QA review.

Western Sydney University DD

 Study area

Drawn by: Richard Tuffin
Checked by: Gina Basile
Date: 29 May 2024
Projection: GDA2020 MGA Zone 56
Data sources: Extent, Nearmap, NSW Spatial Services, ABS, Geoscience Au



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Meters

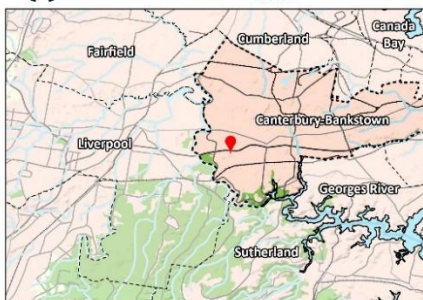


Figure 2. The study area.

Western Sydney University DD

 Study area

Drawn by: Richard Tuffin
Checked by: Gina Basile
Date: 29 May 2024
Projection: GDA2020 MGA Zone 56
Data sources: Extent, Nearmap, NSW Spatial Services, ABS, Geoscience Au



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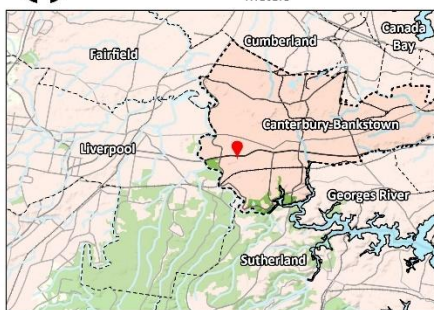


Figure 3. Study area in relation to local region.



Figure 4. DCP C2 zone in relation to the study area (approximately location of the childcare centre outlined in red).

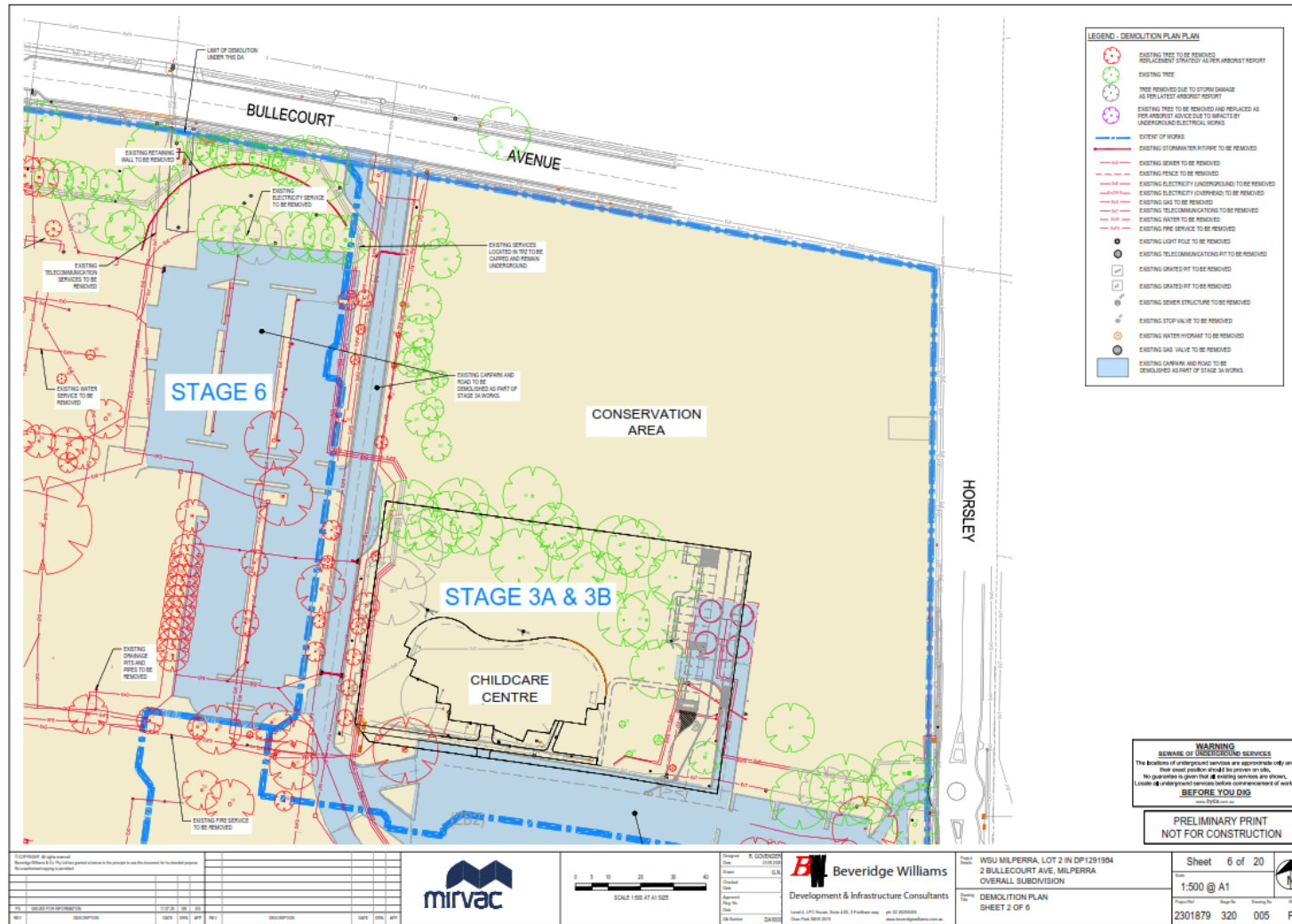


Figure 5. Proposed development –demolition plan.



Figure 6. Proposed development – layout plan.

2. SITE REGISTER SEARCHES

2.1. AHIMS search

The Heritage NSW Aboriginal Heritage Information Management System (AHIMS) database includes a register of recorded Aboriginal Objects and Places, and other site and potential archaeological deposit records. It is important to note that the AHIMS database is not vetted – it can include inaccuracies in the location and description of site recordings. AHIMS includes registrations of Aboriginal Objects and Places that are legally protected under the ambit of *the National Parks and Wildlife Act 1974*, and it also includes other recordings that are not considered to be Aboriginal Objects or Places as defined by the *National Parks and Wildlife Act*. It is important that any records included on the AHIMS are verified and ground-truthed during ACHAR assessments to establish site status and confirm site locations.

An extensive search of the Heritage NSW AHIMS database was carried out on 23/05/2024 (Client ID: 894909) (Appendix B). There are no registered Aboriginal sites within the study area (Figure 7). However, there are a total of twenty-eight sites within a 5 km radius, centred on the study area. The closest registered sites are over 1 km to the northwest and southwest. The registered AHIMS sites show a trend of distribution around waterways and along developments, such as the motorway and the nearby golf course reflecting both how Aboriginal people may have occupied the landscape as well as the locations of developments that have required heritage assessments.

The AHIMS search was validated on 27/05/2025 (Client ID: 1008157), no new sites were identified.

The most common site features recorded for the twenty-eight (28) sites are Modified Trees, with 57% as shown on Table 1 below. However, of the sixteen recorded modified trees within the search area, only one site is listed as valid, with the remaining fifteen sites listed as 'not a site', as they were found to not be of Aboriginal origin (Figure 8). Therefore, the most common site feature within the study area are Artefacts (18%).

We note that AHIMS #45-5-5334 (RGC2020-AS01), which is located just under 2 km to the west of the study area, has been subject to impact via an approved AHIP (#5014), and that its site status may not have been updated at the time of this report. An Aboriginal site impact recording form update is required to accurately reflect whether this site has been impacted by the approved works. However, even destroyed sites inform us of the Aboriginal archaeological remains within the wider region and help us understand predicative models and archaeological potential.

Based on the AHIMS data and regional information, should any sites occur within the study area, it is likely that these would consist of isolated artefacts, low density artefact scatters, or culturally modified trees. While historic flooding along the Georges River reduces the potential for the survivorship of Aboriginal objects within the flood prone areas, elevated areas may be considered to have a greater potential for Aboriginal archaeological remains.

Table 1. Site features recorded in the AHIMS search area.

Site Features	Number	%
Aboriginal Resource and Gathering, Potential Archaeological Deposit (PAD)	1	4
Artefact	5	18
Artefact, Potential Archaeological Deposit (PAD)	1	4
Modified Tree (Carved or Scarred)	16	57
Potential Archaeological Deposit (PAD)	4	14
Shell	1	1
TOTAL	28	100

2.2. EPBC Act search

A search of the *Environment Protection and Biodiversity Act 1999* (EPBC Act) lists indicates the study area does not include any items included under the National, Commonwealth or World lists.

2.3. ATSIHPA declarations search

A search of the Commonwealth Government Gazette indicates that there are no Section 9 (emergency declaration) or Section 10 (other declaration) declarations currently applicable to the study area.

2.4. NSW State heritage register search

The State Heritage Register (including LEP) and the Australian Heritage Database were searched on 23 May 2024 for the suburb of Milperra. Neither contain records in or around the study area that relate to Aboriginal heritage values.

Western Sydney University DD

Study area

AHIMS features

- Aboriginal Resource and Gathering, Potential Archaeological Deposit (PAD)
- Artefact
- Artefact, Potential Archaeological Deposit (PAD)
- Modified Tree (Carved or Scarred)
- Potential Archaeological Deposit (PAD)
- Shell

Drawn by: Richard Tuffin

Checked by: Gina Basile

Date: 29 May 2024

Projection: GDA2020 MGA Zone 56

Data sources: Extent, Nearmap, NSW Spatial Services, ABS, Geoscience Au



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Kilometers

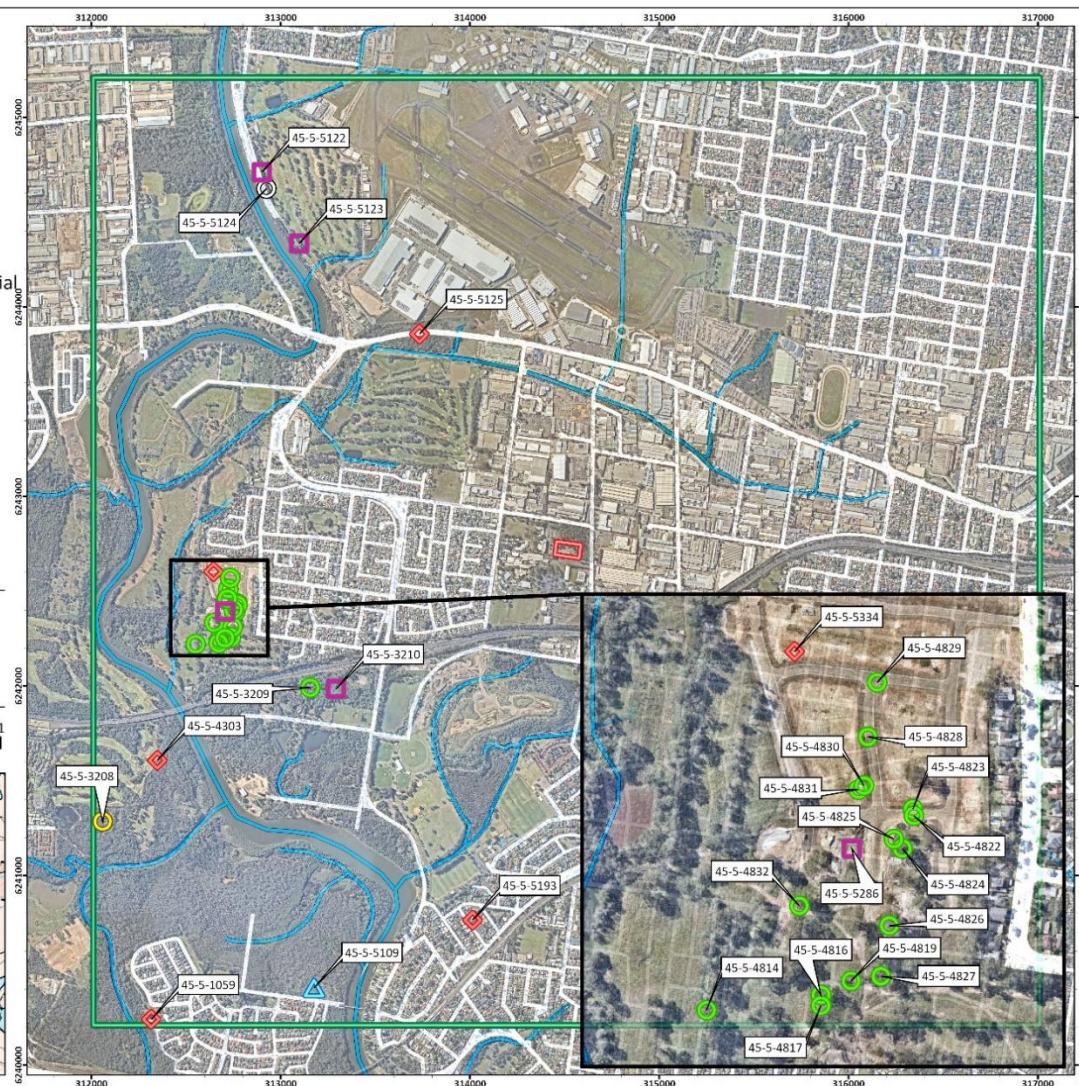
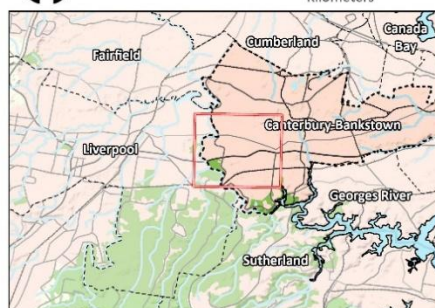


Figure 7. AHIMS Sites within the broader vicinity, including all site statuses.

Western Sydney University DD

Study area

AHIMS features

- Aboriginal Resource and Gathering, Potential Archaeological Deposit (PAD)
- Artefact
- Artefact, Potential Archaeological Deposit (PAD)
- Modified Tree (Carved or Scarred)
- Potential Archaeological Deposit (PAD)
- Shell

Drawn by: Richard Tuffin

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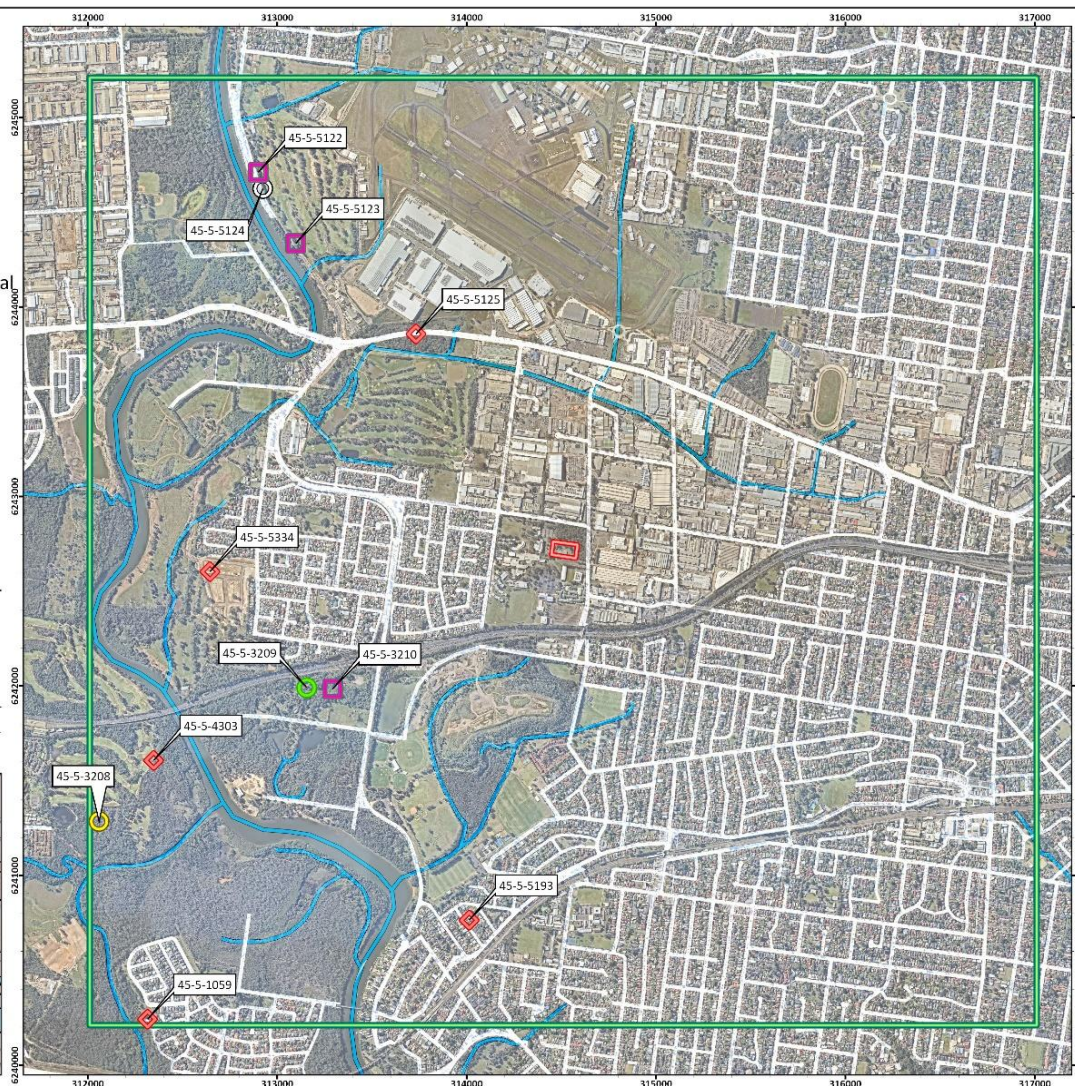
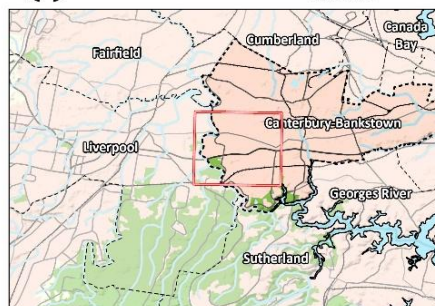


Figure 8. Valid AHIMS sites within the broader vicinity of the study area.

3. DESKTOP RESEARCH

3.1. Environment and landscape

3.1.1. Geological mapping

The geological map of Sydney (1:1,000,000) indicates the study area is located within the Ashfield Shale of the Wianamatta parent group material.

The study area is underlain by Ashfield shales of the Wianamatta Group, and, therefore, the parent bedrock material is typically comprised of black to dark grey shale or laminate material. The lower portion of the Ashfield Shale unit was likely formed by lacustrine (possibly freshwater) sediment deposition, while the upper portion was formed by brackish or shallow marine sediment deposition. The Ashfield Shale unit reaches maximum thicknesses of ~60 m and is typically only exposed as eroded remnants on plateaus (Clark and Jones 1991; Geoscience Australia 2018).

3.1.2. Soil landscape mapping

The 1:100,00 Sydney Soil Landscape mapping indicates the study area is located within the Blacktown soil landscape (Figure 9).

Blacktown Soil Landscape

The Blacktown soil landscape is associated with low hills and rises with broad rounded crests and ridges, with local relief of up to 30 m and slopes of less than 5%. On lower simple slopes, Blacktown soils comprise shallow 10-30 cm of clay loam to silty clay loam, over moderately deep to deep (40 to >140 cm) clay. These types of residual soils are typically shallow, comprised of thin clay loam, sandy loam or sandy clay loam topsoil (A1 horizon) over heavy clays (B horizon), and usually <50 cm deep. The heavy clay unit is generally considered to pre-date the Aboriginal colonisation of Australia, and therefore only the upper A1 horizon has the potential to contain Aboriginal objects.

The shallow depth of Blacktown soils has direct implications for the subsurface presence and survivability of Aboriginal archaeological deposits. The soils are rarely deep enough to retain substantial or deep cultural deposits. In addition, even minor disturbance and/or de-vegetation will often result in the complete removal of the upper parts of the soil profile in which Aboriginal objects may occur.

Although the Blacktown soil landscape generally lacks the sort of subsurface deposits in which archaeological material is commonly found, there are a large number of Aboriginal artefacts recorded as surface finds on the Blacktown soil landscape. This is due to soil deflation and erosion processes that have operated on Blacktown soils, and which have tended to expose (rather than bury) the former land surfaces on which stone artefacts were deposited.

3.1.3. Hydrology

An analysis of topographical mapping and NearMap high resolution aerial photographs indicates the study area does not contain any water bodies, creeklines, or swamps (Figure 10). The closest potential water sources consist of two ephemeral waterways just under 1 km to the north and south, with the closest permanent water source of the Georges River, is located around 2 km to the west and southwest of the study area.

The majority of registered Aboriginal sites in the area are located in close proximity to watercourses, such as the Georges River, this would have provided a resource rich environment for exploitation and use, as an association with waterways present a higher potential for Aboriginal occupation sites.

3.1.4. Landforms

An analysis of the soil landscape mapping, topographic mapping (Figure 11) and NearMap high resolution aerial photographs indicates that the study area is located on a simple slope. This landform consists of elevated ground that slopes down towards the Georges River to the west and lies outside the mapped flood zone. This may have been an ideal spot for camping or a transitional zone for resting and other activities.

Heritage NSW specifies five landscape features which are likely to indicate the presence of Aboriginal objects (DECCW, 2010):

- Within 200 m of waters.
- Within a sand dune system.
- On a ridge top, ridge line or headland.
- Within 200 m below or above a cliff face.
- Within 20 m of or in a cave, rock shelter, or a cave mouth.

Based on analysis of topography and aerial photography, the study area does not contain any of the above-mentioned landscape features.

3.1.5. Vegetation

Mapping of pre-clearance vegetation (Figure 12) indicates that the native vegetation present within the study area would have been characterised by Castlereagh Ironbark Forest, consisting of dry sclerophyll vegetation. This remnant bushland remains within the conservation zone which forms a portion of the study area (Figure 13). Based on our desktop assessment, the southwestern portion of the study area has undergone significant clearing prior to development of the extant childcare centre, however, there is high potential for culturally modified trees within the study area. This potential was investigated and ground-truthed as part of our archaeological survey (for results refer to Section 4).

We note that the proponent has undertaken an arboricultural assessment of wound causation of trees present at 2 Bullecourt Avenue, which encompasses the wider Western Sydney University

campus and the study area. This assessment inspected 14 trees and determined that all were wounded by natural causes and/or mechanical abrasion impacts and were not of Aboriginal cultural origin (Urban Tree Management, 2024, Table 2).

Table 2. Summary of trees inspected by Urban Tree Management (source: Table 1.0, pp. 03, Urban Tree Management 2024).

Table 1.0 Summary of the wound causation of each tree. Trees numbered per the of Temporal Tree Management Arboricultural Impact Assessment (AIA) Report.

Temporal Tree Management, tree No. / Photograph No.	Likely origin of wound/s
TN062 / 11.0 and 11.1	Longicorn borer wound.
TN068 / 13.0 and 13.1	Longicorn borer wound.
TN077 / 12.0 and 12.1	Longicorn borer wound.
TN085 / 14.0 and 14.1	Occluded, branch tear out wound.
TN126 / 1.0 and 1.1	Occluded wound on south side of trunk. Highly likely a wound of mechanical origin from an abrasion impact event.
TN128 / 10.0 and 10.1	Occluded, branch tear out wound.
TN169 / 9.0 and 9.1	Basal wound from Longicorn borers.
TN171 / 8.0 and 8.1	Occluded, superficial abrasion impact event.
TN300 / 2.0 and 2.1	Branch tear out and subsequent borer and fungal decay.
TN344 / 3.0, 3.2 and 3.3	Single trunk wound consistent with infestation by <i>Botryosphaeria</i> sp. of pathogenic fungus.
TN345 / 3.0 and 3.1	Multiple trunk wounds consistent with infestation by <i>Botryosphaeria</i> sp. of pathogenic fungus.
TN371 / 4.0 and 4.1	Abrasion impact event and partial bark delamination.
TN418 / 5.0, 5.1 and 5.2	Cambial dysfunction and necrosis at trunk branch union.
TN421 / 6.0 and 6.1	Occluded, branch tear out wound.
TN422 / 7.0 and 7.1	Insect borer wound on north side on a first order structural branch.



Figure 9. Soil landscape mapping in relation to the study area.

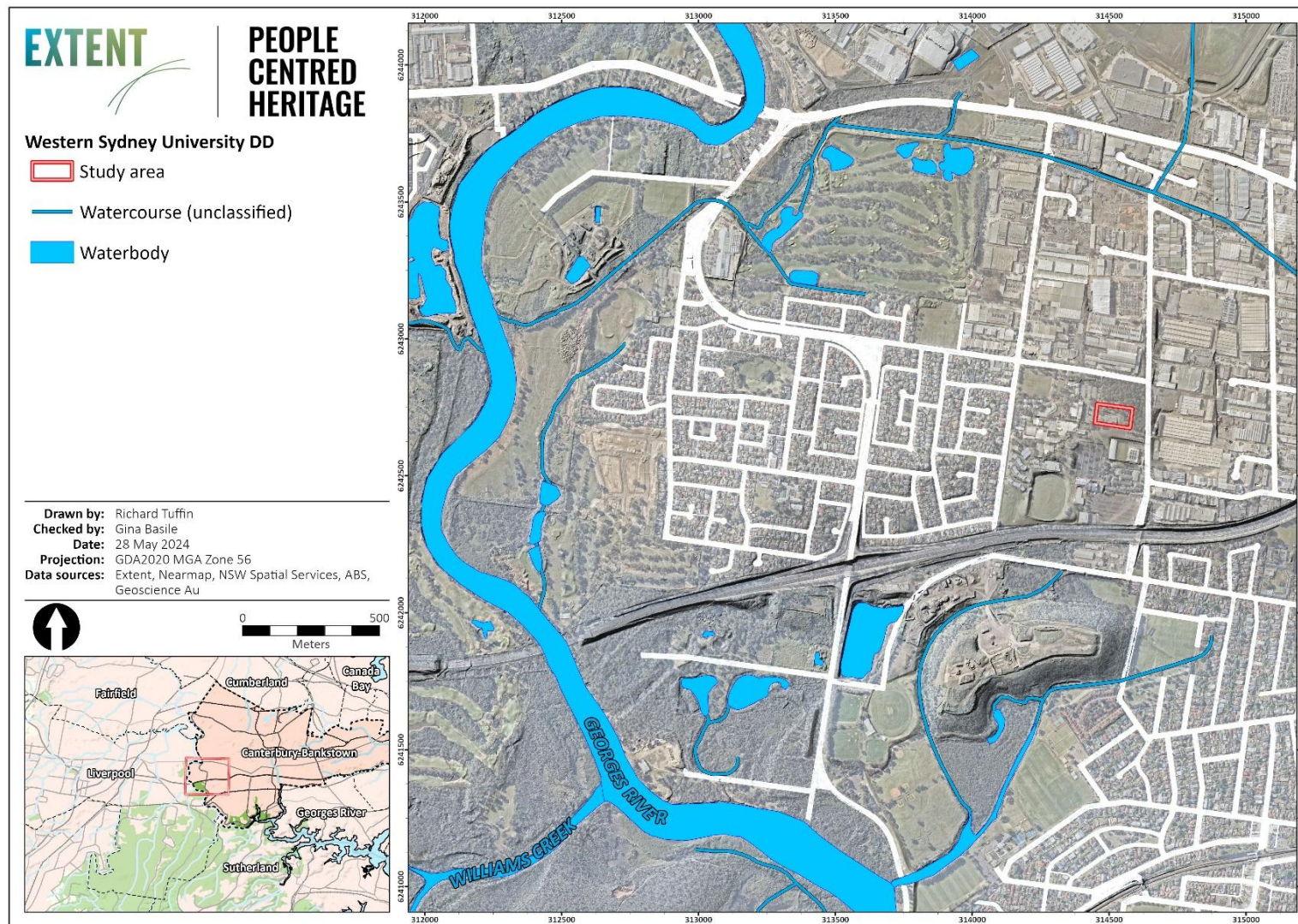


Figure 10. Hydrology within the vicinity of the study area.

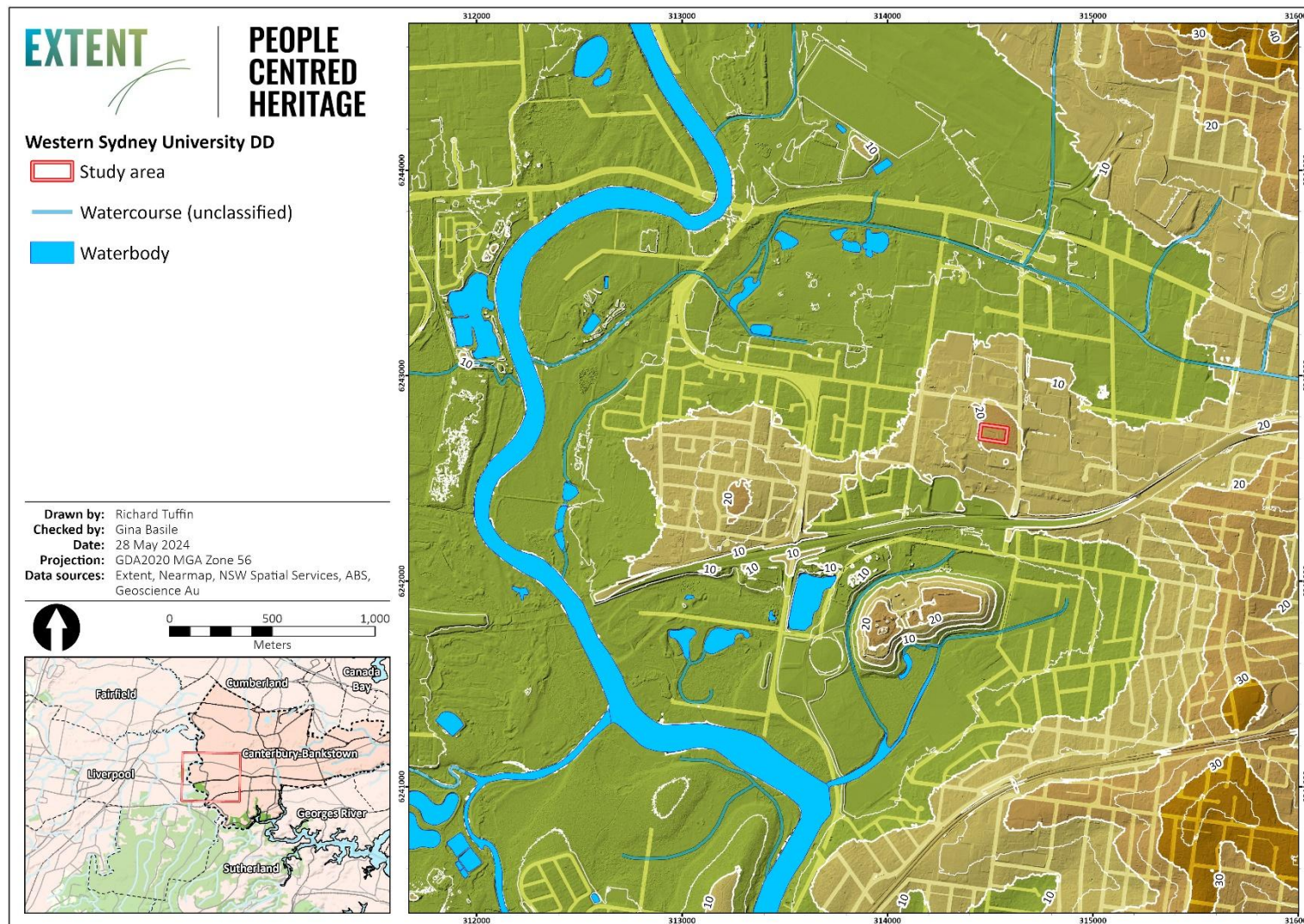


Figure 11. Topographical mapping within the vicinity of the study area.

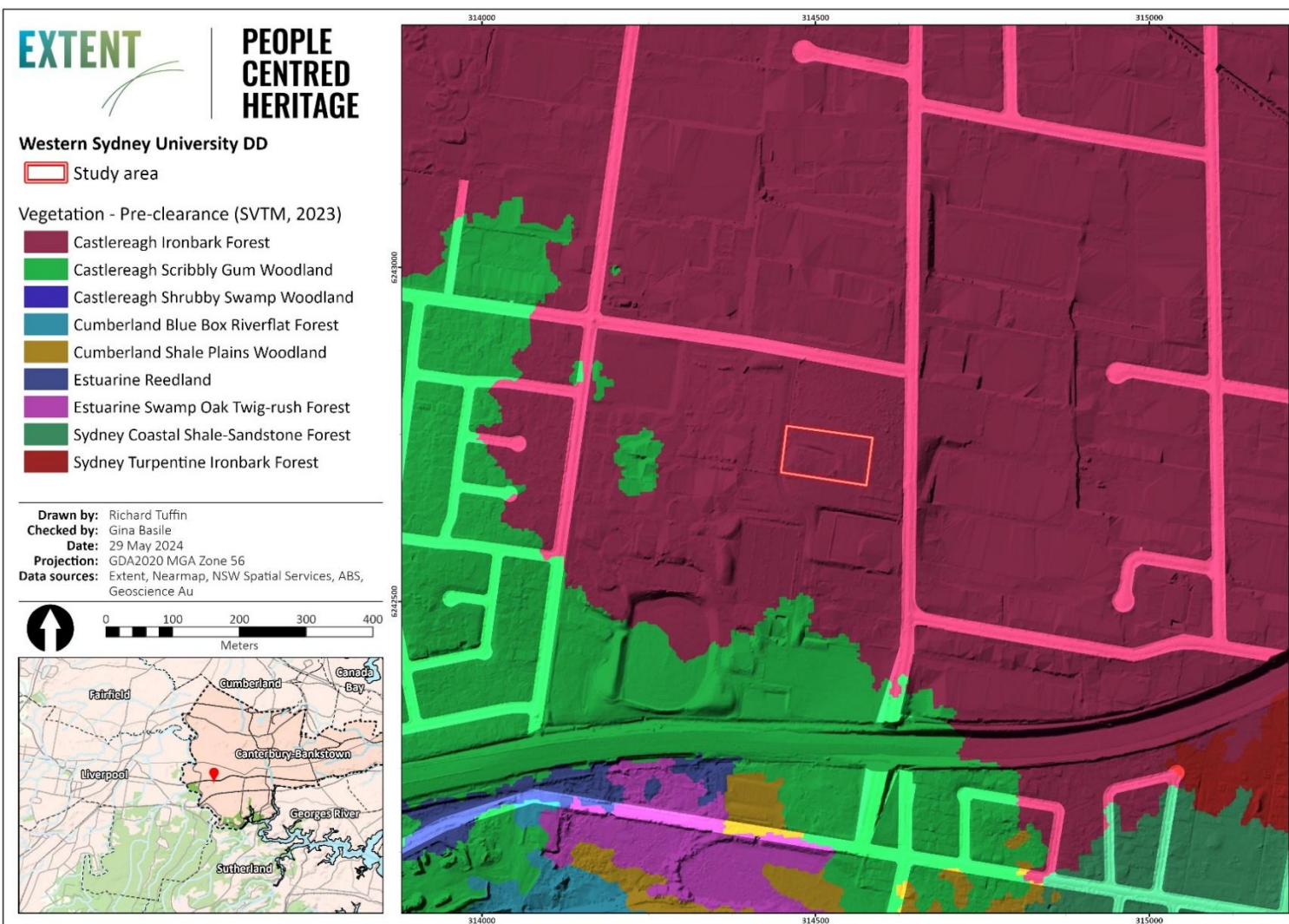
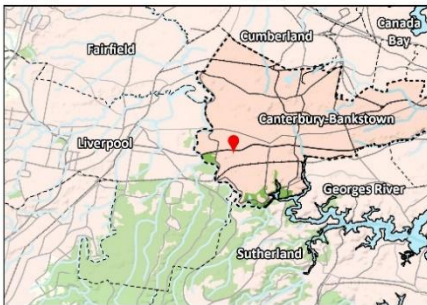


Figure 12. Vegetation within the vicinity of the study area.

Vegetation - Extant (SVTM, 2023)

 Sydney Turpentine Ironbark Forest



Extent Heritage Pty Ltd | Western Sydney University, Milperra, Childcare Centre– Aboriginal Heritage Due Diligence Assessment

3.2. Heritage studies

3.2.1. Regional studies and site patterning

Aboriginal occupation in the Sydney region dates back well into the Pleistocene period. This evidence comes from radiocarbon dating of charcoal retrieved from excavated sites on the metropolitan area's fringes; at Burrill Lake (c 20,000 years before present [BP]), Bass Point (c 17,000 BP), and Loggers Shelter in Mangrove Creek (c 11,000 BP) (Bowdler 1970; Lampert 1971; Attenbrow 1981, 2004).

Archaeological sites dating to the Holocene period, and particularly the late Holocene (the last 5000 years), are more frequently identified in the Sydney region. This is thought to reflect an intensification of the occupation of the area in this period, but also greater survivability of these sites (McDonald 1994). There appears to have been a preference for the occupation of the coastal zone in this period, possibly due to a greater reliance on marine resources through increasing populations, territoriality and greater climatic variability. Excavation of sites at Sheas Creek (Haworth et al. 2004) Quibray Bay (Roy and Crawford 1981), and Kurnell (McDonald 2008 and Dallas 2005) identified shell, bone and organic materials with dates of up to c. 4 ka (Attenbrow 2010:18-19).

Studies of the Sydney region have revealed that Aboriginal sites are distributed across the whole range of physiographic units and environmental zones, although certain types of sites may be more frequently associated with certain parts of the landscape (for example, shelter sites are particularly common in areas of Hawkesbury Sandstone), and different parts of the landscape contain different resources, which may be seasonally available or highly localised (Attenbrow 1990:30).

While local variation in the archaeological record is apparent, for the most part the distribution and type of archaeological material across the Bankstown region is well understood. In a compilation of several decades of previous research by White and McDonald (2010), it was concluded that the archaeological record in the western Cumberland Plain was almost entirely composed of varying concentrations of Aboriginal objects (isolated finds, background scatters and artefact scatters) predominantly situated within 200 m of water sources; and with more extensive/significant deposits all occurring within 100 m of major creek lines.

In terms of archaeological sensitive landforms, high densities of artefacts have been principally found on lower slopes, alluvial floodplains next to high order streams and on middle to upper ridges in the western Cumberland Plain. On more substantial river systems, such as the Nepean River, Parramatta River and Georges River, ridgelines and levee banks over-looking the river have also been shown to contain substantial, and often very old cultural material. Some of these high density sites show evidence of knapping (stone tool making) activities. However, low density artefact scatters have been found on the surface of all landforms including creek banks, creek terraces, flats, lower and upper slopes, elevated spurs, crests and ridge tops. These results are indicative of a 'background scatter' of occupation occurring across the region with sporadic areas of intensive or repeat usage.

The regional studies indicate the most common site types found on the landforms present in the study area may include:

- Isolated stone artefacts.
- Low-density artefact scatters.
- Culturally modified trees.

3.2.2. Local studies

Archaeological Survey of Freeway No. 5, Section between King Georges Road, Beverly Hills, and Heathcote Road, Moorebank (Haglund 1984)

A survey was conducted in July 1984 for a 12.7 km section of the proposed path of the No. 5 freeway (current M5 Southwestern Motorway). Part of this survey covered an area adjacent to the southern boundary of the Western Sydney University Campus, around 400 m south of the current area. Two sites, one artefact scatter and one isolated find were located within the former Greenwood Golf Course around 2.3 km to the southwest of the study area. The survey section from Henry Lawson Drive to the River Road that traversed the southern edge of the Western Sydney University Campus and was described as a 'low-lying damp stretch covered in grass and weeds' with most surface appearing disturbed and generally low visibility.

Archaeological Survey for Prehistoric Sites at Voyager Point, NSW (JMCHM 1996)

This archaeological survey report and fieldwork was prepared for Delfin Management Services as part of the Pleasure Point Urban Release Area, located around 2.5 km to the southwest of the study area. This survey found the local environment to primarily consisted of a freshwater swamp on the Georges River, with a greater presence of sandstone geology and focused their assessment along the Georges River. The assessment located 3 previously unrecorded sites, 2 scarred trees and an open midden. Both scar trees and midden sites represent relatively rare site types in this part of the Sydney region.

Aboriginal Cultural Heritage Assessment: SIMTA Moorebank Intermodal Terminal Facility (AHMS 2012a).

In late 2010, AHMS was commissioned by Hyder Consulting Pty Ltd for SIMTA to undertake an Aboriginal Heritage Impact Assessment of the SIMTA site for a Concept Approval under Transitional Part 3A of the *Environmental Planning and Assessment Act 1979*. The SIMTA Moorebank site is located approximately 7.5 km to the south-west of the current study area.

The assessment included an archaeological predictive model which was informed by a detailed background analysis of previous archaeological investigations in the region and information from the AHIMS database. A site survey was also undertaken in conjunction with the Aboriginal communities. The assessment identified that most of the SIMTA site and parts of the proposed rail corridor were heavily disturbed and/or previously developed areas, and the potential for preservation of archaeological materials was low. Ultimately, seven isolated Aboriginal objects and three areas of potential archaeological deposit (PAD) were identified. These areas included: a river

terrace on the east side of the Georges River (PAD 1); the golf course south of Anzac Creek (PAD 2); and the southern-most part of the SIMTA site, and the disused rail corridor directly south of and adjacent to the SIMTA site (PAD 3). A strip of land along the western bank of Georges River (and outside the SIMTA Project boundary) was also identified for cultural values. Specifically, the report stated:

Area 1 is considered potentially culturally significant, as it is a wooded area adjacent to the western side of the Georges River, and Aboriginal cultural sites have been identified in a similar landform on the eastern side of the river. It may contain stone artefacts, which are culturally significant to the RAPs as evidence of the material culture of their ancestors.

This area identified as having cultural value is situated adjacent to the railway line on the western side of Georges River.

Additionally, an Indigenous Biodiversity Values assessment was undertaken in relation to the above project. The report found that all native species may be considered to have a level of significance attached to them (AHMS 2012b).

Aboriginal Heritage Study for Proposed Rezoning of Riverlands Golf Course, Milperra NSW (AHMS 2012c).

AHMS was commissioned by Bankstown City Council to undertake an Aboriginal Heritage study for proposed rezoning of the Riverlands Golf Course, Milperra NSW. The golf course is located approximately 1.5km to the west of the study area, along the Georges River.

This assessment was based primarily on existing information and a surface site inspection to provide a map of the potential for Aboriginal cultural heritage to be present. The report found that elevated areas in the southeast of the site (and encompassing much of the golf course) had the potential to contain Aboriginal cultural heritage.

Aboriginal Heritage Preliminary Assessment Glenfield Waste Disposal (AHMS 2014).

In mid-2012, AHMS was commissioned by Environmental Property Services Pty Ltd for L.A. Kennett Enterprises Pty Ltd to undertake an Aboriginal Heritage Assessment of the southern portion of the Glenfield Waste Disposal site, Glenfield, NSW. The waste disposal site is situated on the western side of Georges River, approximately 8 km to the southwest of the current study area.

The result of the assessment highlighted that most of the subject area was heavily disturbed and/or previously developed, and the potential for preservation of archaeological materials was low. However, two areas appeared to be less disturbed: an area of bushland in the western half of the subject area; and an alluvial terrace adjacent to a minor tributary of the Georges River, in the south-eastern corner of the subject area. Four archaeological sites were identified within the subject area, 3 isolated artefacts and one potential archaeological deposit (PAD).

Moorebank Intermodal Terminal (Navin Officer Heritage Consultants 2014).

In 2014, an Aboriginal heritage assessment was undertaken of the proposed Moorebank Intermodal Terminal located to the west of Moorebank Avenue, around 6 km to the west of the study area.

Their assessment consisted of several field surveys and excavations across the site between 2010 and 2014. Initial field investigations identified five artefact scatters, three scarred trees, three PADs, and three archaeological sensitive landforms.

Subsequent work consisted of test excavations in 2012 and 2013. The 2012 excavations consisted of 59 test pits excavated across the site, and recovered 264 Aboriginal objects (from 26 test pits). Subsequent excavations undertook a further 45 manually dug test pits and eight mechanically dug trenches, all focussed within a PAD located on a low-lying floodplain running along the west side of Georges River. These excavations revealed three discrete areas of cultural deposit. Archaeological materials were generally found in low densities. Artefacts were dominated by silcrete and quartz, likely of late Holocene age.

Geomorphological assessment of the works identified the deep nature of many of the deposits. The soil profile was generally composed of a deep sandy soil overlying "coffee rock" or clayey subsoils. The majority of the test pits revealed some evidence of disturbance and/or truncation, and it was considered that little of the surface reflected a pre-European landscape. However, no soil analysis to determine the origin of the soil profile, nor dating, appeared to have been undertaken to further characterise the deposits or associated cultural materials.

Ultimately, the investigations identified 13 discrete archaeological sites. These sites were assessed under Burra Charter and Commonwealth Heritage listings, and with identification of the sites ranging from high to low. The assessment also identified the banks of Georges River as of archaeological importance. Navin Officer made a number of recommendations, including further assessment of the scarred trees, sub-surface investigation of parts of the Georges River corridor, MRSA 2 and MAPAD2, and salvage excavation of two of the sites.

SIMTA Intermodal Terminal – Stage1 Aboriginal Heritage Impact Assessment (AHMS 2015).

Following the earlier assessment (referenced above), AHMS carried out a series of test excavations along the Stage 1 rail corridor, focussing on two PADs located on the eastern bank of Georges River and either side of Anzac Creek.

Overall, 13 test pits (1m²) were excavated. The excavations revealed a deep (50-90 cm) coarse silt soil unit over-lying coffee rock of clay subsoils, and frequently impacted by introduced fill on the surface. The soil was characteristic of deposition by flooding of Georges River in the past. 28 Aboriginal objects were recovered from the test pits associated with Georges River and suggested a low-level of past activity on the maximal upper slope and ridge in this area. Importantly, the assemblage was considered to reflect two different periods of activity in the past. The upper assemblage was characteristic of occupation in the last few thousand years, and this was corroborated by an OSL age of 3.4ka. The lower assemblage was found in association with an age of 18ka, and represents some of the earliest evidence of activity on the Georges River. The sand sheet itself began forming at ~60ka.

An additional PAD was re-considered and limited to an area encompassing the elevated areas immediately above Georges River. This area was re-labelled as MA14 to reflect its new identification

as an artefact scatter and deposits (and to ensure compatibility with other sites labelled similarly nearby). MA14 was considered to have high research potential, and was assessed as being of local significance, with potential to be of State significance. Further archaeological salvage work was recommended for MA14 during later stages of the project.

RE: Western Growth Project: Milperra Campus Redevelopment – Aboriginal Heritage Due Diligence Assessment (Extent Heritage 2018)

This report was prepared for APP Corporation on behalf of WSU (Western Sydney University). The assessment was prepared following plans for a campus wide redevelopment, which includes the current study area. The majority of the WSU campus was found to be heavily disturbed with no registered AHIMS sites within the campus. Overall, the report found across the campus, areas of potential for Aboriginal objects/sites occurred near first order stream tributaries and in areas of less disturbance, such as the northeastern corner of campus, near the current study area.

Aboriginal Cultural Heritage Assessment 270-286 Horsley Road, Milperra (Biosis 2023)

This ACHA was prepared for ESR Developments for an SSD and located 200 m east of the current study area. The report states that past Aboriginal activity would have more likely been focused closer to the Georges River, and that their present study area may have reflected a more transitory space.

The report noted high levels of historical disturbances across their assessment area, and that the A-horizon soils likely to contain archaeological traces may have been completely removed. Geotechnical investigation of the area found moderate fill deposits over alluvial and residual clay deposits.

The report found that the site is of high cultural significance to the local Aboriginal communities as part of the wider cultural landscape associated with the Georges River. Overall, no Aboriginal sites or areas of archaeological potential were identified during the assessment.

Summary

The local studies indicate there may be potential for Aboriginal sites within parts of the study area that:

- Artefact scatters, shell middens and or buried archaeological deposits or buried human remains within relatively undisturbed land surfaces on elevated land outside of the flood zone of the Georges River.
- Scarred or carved trees in areas that contain old growth native trees.

The northern boundary of the study area, and conservation zone to the north, reflects a relatively undisturbed, remnant landscape within a heavily urbanised and industrial area which has undergone intensive historical disturbances on a regional level.

3.3. Previous disturbance

An analysis of NearMap high resolution aerial photography and a series of historical aerial photographs spanning 1943 to 2013 (Figure 14 - Figure 19) indicates that the study area has been subject to minor landform modification and disturbance prior to the developments present within the study area by 2013, consisting of the extant childcare centre, water storage tanks, roads, carparking, and other buildings associated with the WSU Campus (Figure 19).

The earliest available historical aerial imagery from the 1940s show early disturbances are largely restricted to scouring in the centre of the study area, which could be attributed to erosion or localised timber getting (Figure 14). Additionally, the western and southeastern portions have largely been cleared of vegetation.

Disturbance during the 1970s consists of an informal access track running west from Horsely Road (Figure 15). This access track may be associated with the installation of a dam in the lower southeastern portion of the study area (Figure 15). This dam is not clear in the 1975 aerial (Figure 16), however it appears to be filled in by the 1978 aerial (Figure 17). The dam is evidence of small scale cut and fill works being undertaken within the study area. Due to these works, there is the potential for surface and subsurface artefacts to be redeposited and present within a secondary context. There is also the potential that fill was imported for the filling of the dam around 1978, if this is the case potential artefacts located within the southeastern portion of the study area may be the result of importation. The southeastern portion has since been subject to development which may have caused the dispersal of imported artefacts if present. Further vegetation clearing is present along the western sections of the study area.

The 1991 and 2013 aerials (Figure 19) indicate the first major impacts on the majority of the study area. Works undertaken prior to this aerial include the currently extant childcare centre, water storage tanks, carparking, formalised footpaths, roads, and associated landscaping. The development of the childcare centre and carparking has impacted the majority of the study area, with surface impacts including footpaths and landscaping, and subsurface impacts associated with the associated services. Such development has the potential to disturb artefacts, as such there is the potential for surface and subsurface artefacts to be redeposited within secondary contexts. There is also the potential that fill was imported for works such as garden bed establishment and construction fill, if this is the case artefacts may be the result of importation.

Due to disturbances to the site, there is the potential for intact soil bodies across the northern border of the study area. Based on our desktop assessment and history of the site, there is also the potential for redeposited and displaced artefacts to be present within exposures across the study area. Due to the conservation area abutting the childcare centre there is the potential for culturally modified trees to be present among the remanent vegetation within the study area, however, this was investigated and ground-truthed as part of our archaeological survey (for results see Section 4).

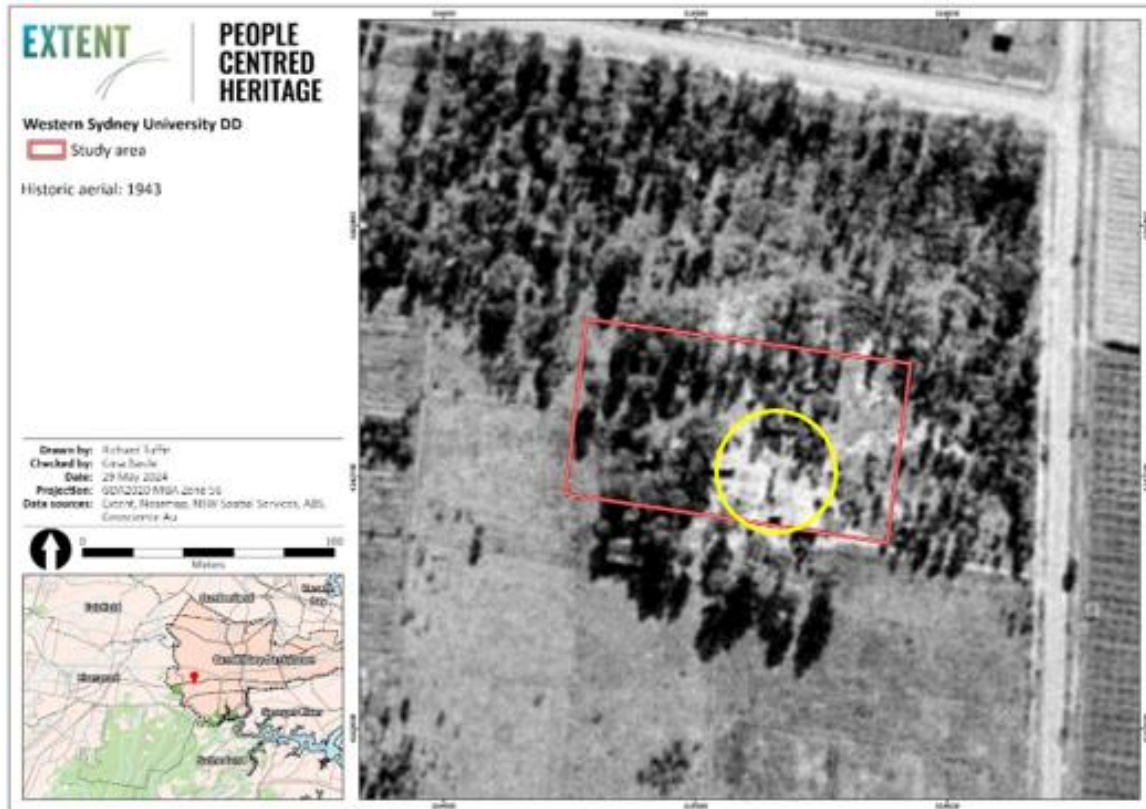


Figure 14. Historical aerial 1943 showing scouring outlined in yellow.

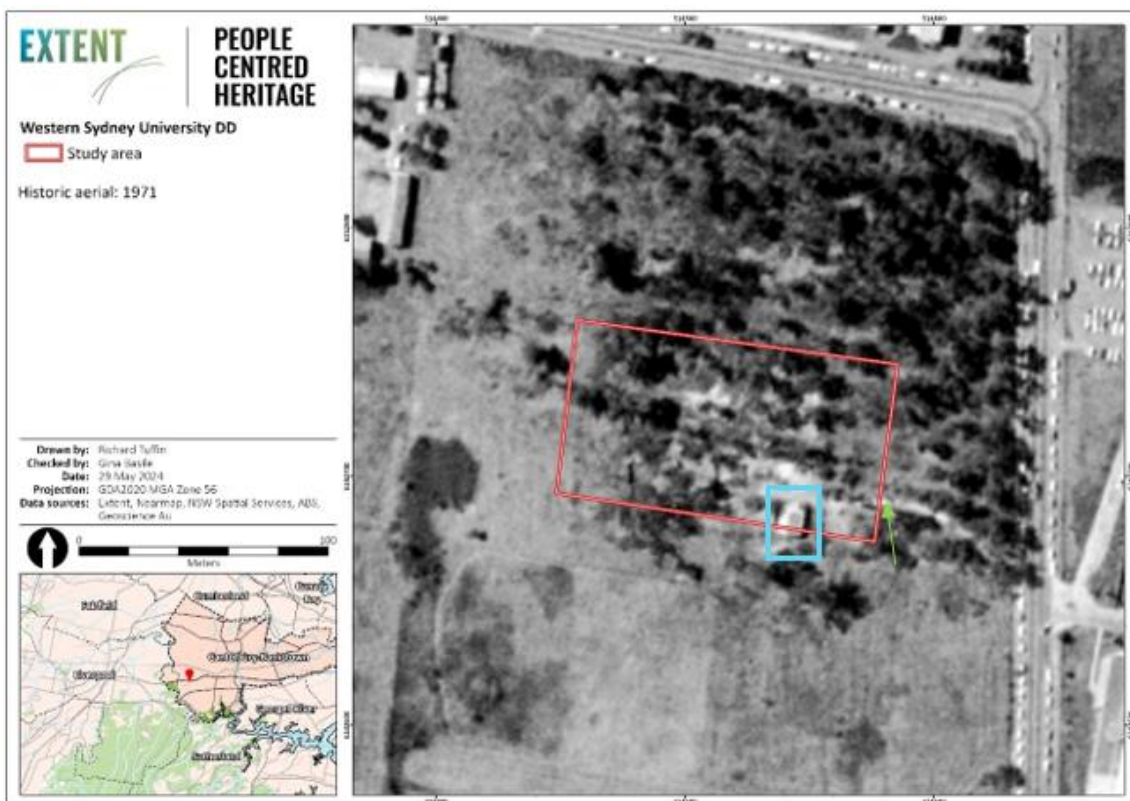


Figure 15. Historical aerial 1971 with access track indicated by a green arrow, and dam outlined in blue.

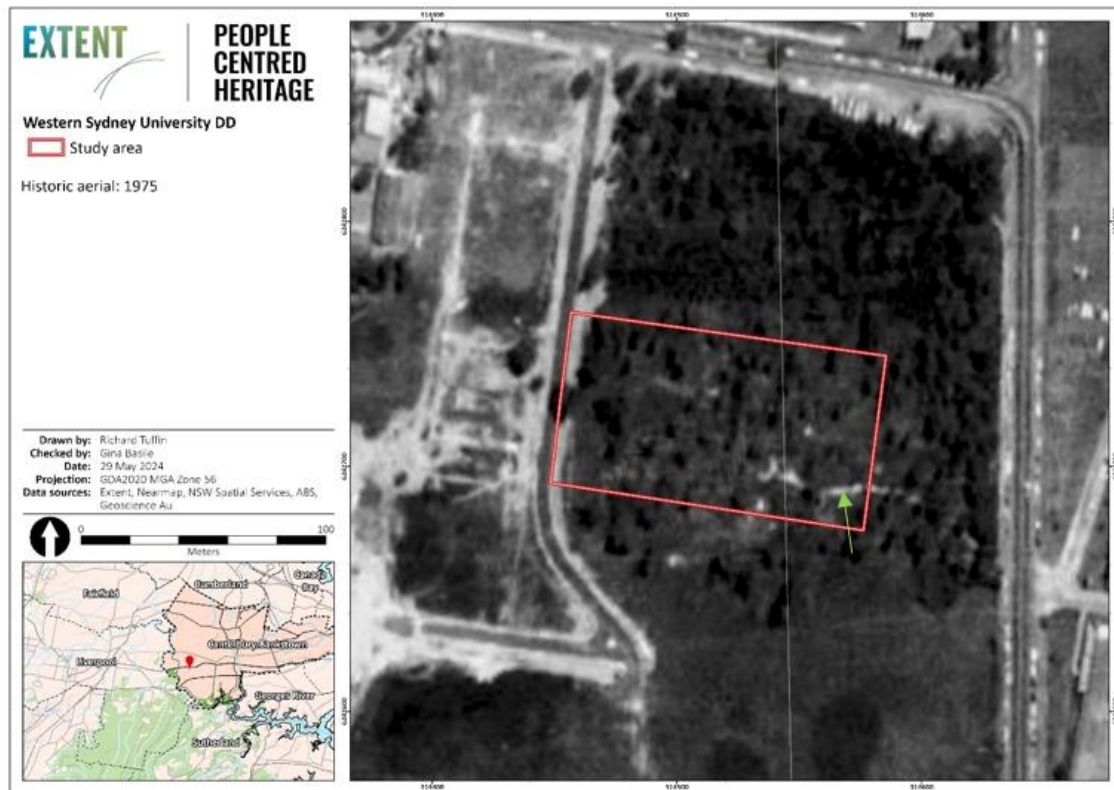


Figure 16. Historical aerial 1975 with access track indicated by a green arrow.

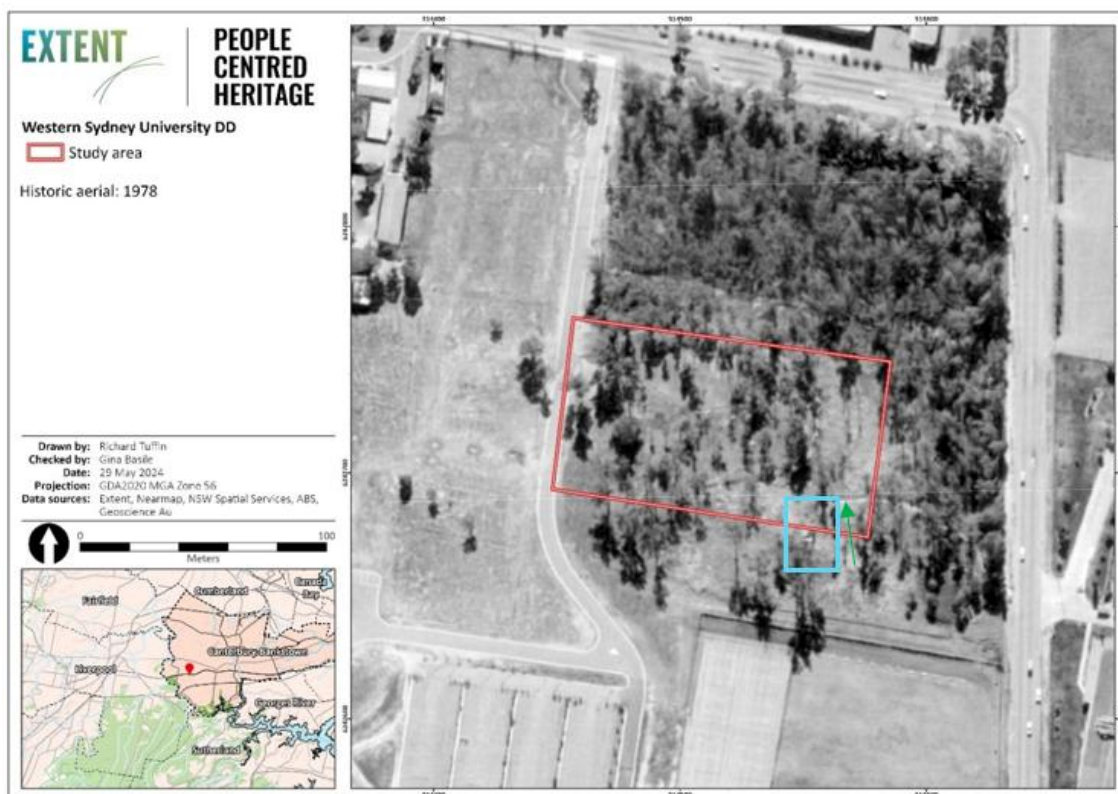


Figure 17. Historical aerial 1978 with access track indicated by a green arrow and backfilled dam outlined in blue.

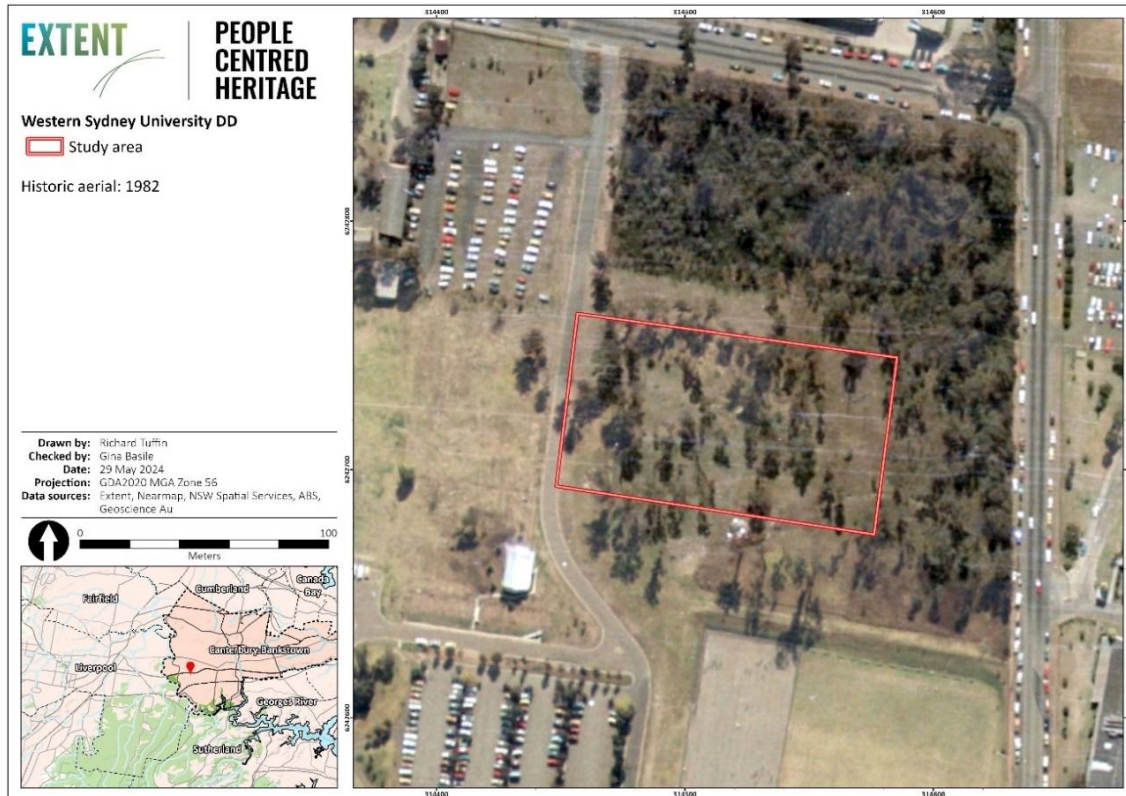


Figure 18. Historical aerial 1982.

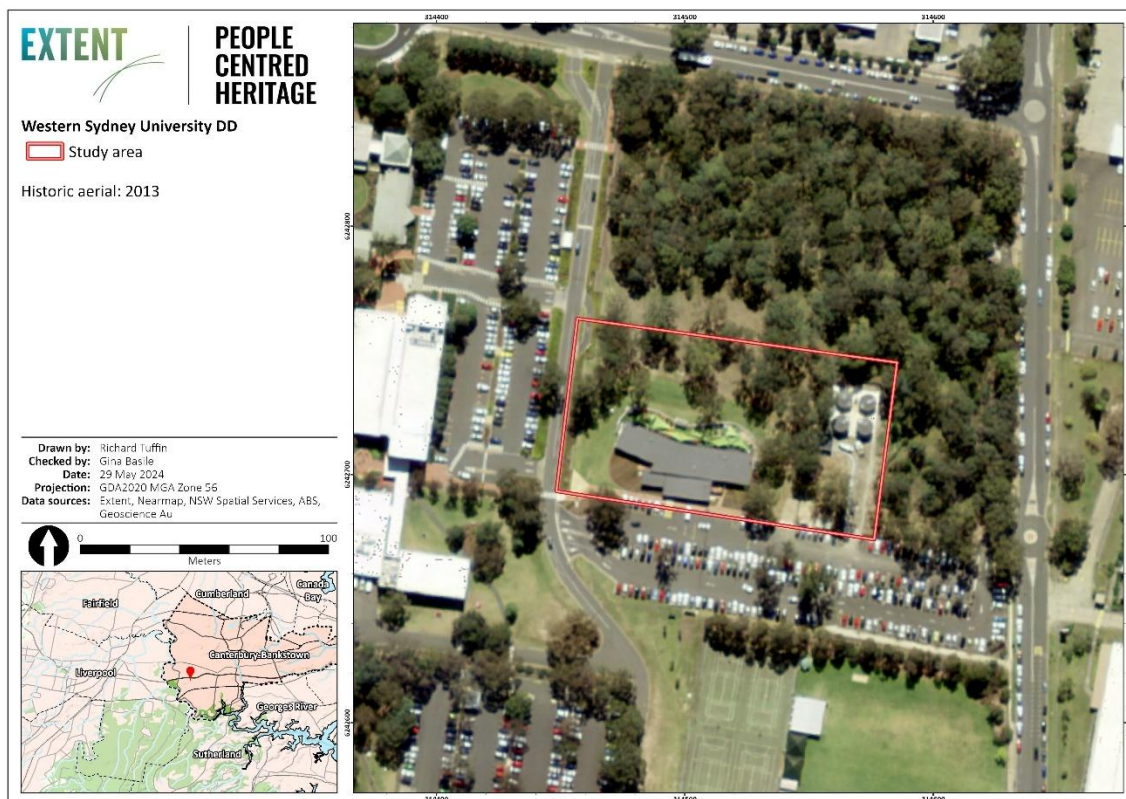


Figure 19. Historical aerial 2013.

4. SITE INSPECTION

A preliminary archaeological site inspection was undertaken on 4 June 2024 by Gina Basile and Catherine Fenech of Extent Heritage. This site inspection only assessed the proposed footprint of the childcare centre and grounds. Exposed ground surfaces were inspected to identify whether or not any surface artefact scatter or shell midden deposits are present. Mature native trees were identified and inspected for any potential cultural modifications. There were no rock overhangs or exposed sandstone outcrops, therefore, there were no cultural material identified that may be associated with this site type.

No Aboriginal sites or objects were identified during the survey, including in areas of good ground surface exposure and visibility. Little of the original ground surface was visible due to the existing structures, grass coverage, and moderately modified landform. There were small pockets of exposed soils, primarily around the base of trees (Photograph 1 and Photograph 2). However, small stockpiles of imported soil and mulch were noted in several areas in the study area.

The existing childcare centre appears to be cut into the natural slope (Photograph 3 - Photograph 5). The water storage and pump facility has stripped the topsoil and is constructed onto concrete slabs and connected to sub-surface services. The location of the proposed café/sales facility shows existing disturbances through the presence of sub-surface services (Photograph 6 and Photograph 7).

The inspection identified moderate evidence of prior landform modification and disturbance through cutting and levelling activities, construction of the existing childcare centre, water storage and hydrant facilities, and access roads (Photograph 9 and Photograph 10). All trees within the study area were inspected, and no cultural modifications were observed.

No surface artefacts, culturally modified trees, shell midden, nor sandstone outcrops were identified during the site inspection.



Photograph 1. View north over area of exposure.



Photograph 2. View of Imported gravels within exposure.



Photograph 3. View west showing existing disturbances and structures and the slope of the natural landform.



Photograph 4. View south showing the landform and existing structures.



Photograph 5. View along northern boundary of the existing facility showing cut into the landform.



Photograph 6. View north over the proposed location for the café facility.



Photograph 7. View southwest over the proposed café facility location showing existing disturbances.



Photograph 8. View northwest showing old-growth trees and landform.



Photograph 9. View south along retaining wall showing cut into the natural landform.



Photograph 10. View north showing existing disturbances, services and imported fill.

5. CONCLUSIONS

No Aboriginal objects or places as defined by the *National Parks and Wildlife Act 1974* are located within the study area. Therefore, an Aboriginal Heritage Impact Permit approval is not currently required for the proposed works.

There are currently no places within the study area included on the National, Commonwealth or World lists under the EPBC Act. There are no known Declarations under the ATSIHPA in relation to the study area. No Commonwealth heritage approvals are currently required with respect to Aboriginal heritage. There are no SHR or LEP listings relating to the study area.

With reference to the risk management process set out in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW, 2010), we note:

- There are no AHIMS sites recorded within the proposed works area, Stage 3A and 3B;
- The study area does not contain landscape features which are likely to indicate the presence of Aboriginal objects, however;
- The proposed works area is located within an area of 'disturbed land' as defined in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010).

The location of the proposed works area, Stage 3A and 3B, are on 'disturbed land' means the risk of encountering Aboriginal objects is lower than on undisturbed land. In accordance with Step 2b of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* DECCW 2010, the works may 'proceed with caution' (Appendix D).

While the process set out in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010) indicates 'proceed with caution' for the proposed works, there is always some risk that unexpected Aboriginal cultural deposits or skeletal remains may be encountered during development works, including in areas such as the current study area that have been heavily disturbed by prior earthworks.

We understand that the study area is immediately adjacent to the C2 Environmental Conservation zone which stipulates the preparation of an ACHAR prior to ground disturbances, however, we note this assessment, in accordance with the relevant *Code*, has determined that there is nil-low potential for Aboriginal objects to be present within the study area. While there are no examples of cultural modification present on the trees retained within the study area, we recommend that wherever possible, old-growth native trees not be disturbed, and native plants and trees be integrated into any planting and landscaping schedules. However, the recommendations and mitigation measures developed as part of the ACHAR (Heritage Now, 2025) for the proposed development may supersede this assessment.

6. RECOMMENDATIONS

In accordance with the risk management process set out in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW, 2010) and the legal requirements of the *National Parks and Wildlife Act 1974*, we recommend:

1. No Aboriginal objects are recorded within the proposed works area, Stage 3A and 3B.
Therefore, there are no Aboriginal Heritage Impact Permit approvals currently recommended in relation for the proposed works. Recommendations from the Heritage Now ACHAR should be reviewed in relation to this area.
2. Wherever possible, the remnant native trees within the study area should be retained and not disturbed.
3. Native plants and trees should be integrated wherever possible in the proposed planting and landscaping schedule.
4. The proposed works may 'proceed with caution' in accordance with the risk management process set out in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW*.
5. While the works may proceed with caution, there remains some potential for the presence of unexpected Aboriginal objects or Aboriginal skeletal remains within the study area.
6. In the event that unexpected Aboriginal objects (or potential Aboriginal objects) are discovered during development, all works in the vicinity of the discovery site should cease and the site manager and/or proponent should immediately notify Heritage NSW, to determine whether further Aboriginal heritage assessment or permit approvals are required.

It is an offence to harm Aboriginal objects without an Aboriginal Heritage Impact Permit approval from Heritage NSW. Work must not recommence at the location of the discovery site until any necessary permits under the National Parks and Wildlife Act 1974 have been approved by Heritage NSW and all permit conditions have been completed.

7. If human remains, or suspected human remains are discovered, all works must cease and the unexpected finds protocol (see Appendix C) must be followed.

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APPENDIX A. INFORMATION ON LEGISLATION

A.1. Commonwealth Legislation

Aboriginal and Torres Strait Islander Heritage Protection Act 1984

The Aboriginal and Torres Strait Islander Heritage Protection Act was enacted at a Federal level to preserve and protect areas (particularly sacred sites) and objects of particular significance to Aboriginal Australians from damage or desecration. Steps necessary for the protection of a threatened place are outlined in a gazetted Ministerial Declaration (Sections 9 and 10). This can include the preclusion of development.

As well as providing protection to areas, it can also protect objects by Declaration, in particular Aboriginal skeletal remains (Section 12). Although this is a Federal Act, it can be invoked on a State level if the State is unwilling or unable to provide protection for such sites or objects.

Environment Protection and Biodiversity Conservation Act 1999

The Environment Protection and Biodiversity Conservation Act provides for the protection of natural and cultural heritage places. The Act establishes (amongst other things) a National Heritage List (NHL) and a Commonwealth Heritage List (CHL). Places on the NHL are of natural or cultural significance at a national level and can be in public or private ownership. The CHL is limited to places owned or occupied by the Commonwealth which are of heritage significance for certain specified reasons.

Places listed on the NHL are considered to be of State and local heritage value, even if State or local various heritage lists do not specifically include them.

The heritage values of places on the NHL or the CHL are protected under the terms of the EPBC Act. The Act requires that the Minister administering the EPBC Act assess any action which has, will have, or is likely to have, a significant impact on the heritage values of a listed place. The approval (or rejection) follows the referral of the matter by the relevant agency's Minister.

Native Title Act 1993

The Native Title Act provides recognition and protection for native title. The Act established the National Native Title Tribunal to administer native title claims to rights and interests over lands and waters by Aboriginal people. The Tribunal also administers the future act processes that attract the right to negotiate under the *Native Title Act 1993*.

The Act also provides for Indigenous Land Use Agreements (ILUA). An ILUA is an agreement between a native title group and others about the use and management of land and waters. ILUAs were introduced as a result of amendments to the *Native Title Act in 1998*. They allow people to negotiate flexible, pragmatic agreements to suit their particular circumstances.

An ILUA can be negotiated over areas where native title has, or has not yet, been determined. They can be part of a native title determination, or settled separately from a native title claim. An ILUA can be negotiated and registered whether there is a native title claim over the area or not.

A.2. NSW state legislation

Environmental Planning and Assessment Act 1979

The Environmental Planning and Assessment Act (EP&A Act) requires that environmental and heritage impacts are considered by consent authorities prior to granting development approvals. The relevant sections of the EP&A Act are:

- Part 4: Development that requires consent under consideration of environmental planning instruments.
- Part 5: An assessment process for activities undertaken by Public Authorities and for developments that do not require development consent but an approval under another mechanism.

Where Project Approval is to be determined under Part 4 (Division 4.1) of the Act, further approvals under the *National Parks and Wildlife Act 1974*, are not required. In those instances, management of Aboriginal heritage follows the applicable Aboriginal assessment guidelines (the Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation, July 2005) and any relevant statement of commitments included in the Development Approval.

National Parks and Wildlife Act 1974

The National Parks and Wildlife Act (NPW Act) provides blanket protection for Aboriginal objects (material evidence of Indigenous occupation) and Aboriginal places (areas of cultural significance to the Aboriginal community) across New South Wales. An Aboriginal object is defined as:

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

An Aboriginal place is any place declared to be an Aboriginal place by the Minister for the Environment, under section 84 of the Act.

It is an offence to disturb Aboriginal objects or places without a permit authorised by the Director-General of the Office of Environment and Heritage. In addition, anyone who discovers an Aboriginal object is obliged to report the discovery to OEH.

The operation of the NPW Act is administered by OEH. With regard to the assessment of Aboriginal cultural heritage, OEH has endorsed the following guidelines:

- *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010),



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

Aboriginal Land Rights Act 1983

The Aboriginal Land Rights Act allows for the transfer of ownership to a Local Aboriginal Land Council of vacant Crown land not required for an essential purpose or for residential land. These lands are then managed and maintained by the Local Aboriginal Land Council.



APPENDIX B. AHIMS SEARCH

APPENDIX C. UNEXPECTED FINDS PROTOCOL

If human remains, or suspected human remains, are discovered during project works, the following actions will be taken:

1. All ground-disturbing works in the area of the remains will cease immediately following the discovery. The discoverer of the remains will notify machinery operators in the area to ensure work is halted.
2. The remains will not be removed from the area or disturbed in any other way
3. The area will be secured by use of protective barriers, to ensure no harm can occur to the remains
4. The site supervisor and the proponent will be immediately informed of the discovery
5. A competent specialist (an archaeologist or biological anthropologist) could be engaged at this point to determine if further assessment of the suspected remains is required. A specialist in the identification of human remains would need to undertake this assessment. If a suitable specialist is not utilised at this stage, then the process moves to step 8.
6. If it is determined that the suspected remains are not human, work can recommence.
7. If it is determined that the suspected remains are human, or are likely to be, the following steps must occur, in accordance with the relevant legislation (including the *Coroners Act 2009*, the *National Parks and Wildlife Act 1974* and the *Heritage Act 1977*).
8. Notify the following organisations:
 - NSW Police
 - Heritage NSW - 1300 361 967
9. The NSW Police will determine if the suspected human remains are human and if they represent a crime scene. If the human remains are determined to represent a criminal act, the NSW Police will direct proceedings, including deciding when works may continue.
10. If NSW Police determine that the suspected human remains are human and are Aboriginal Ancestral Remains, or non-Aboriginal Ancestral Remains, Heritage NSW will be responsible for determining the next course of action.
11. All activities will be directed by Heritage NSW.
12. Works cannot proceed on site until Heritage NSW determine that it is appropriate to do so.



APPENDIX D. SITE SPECIFIC DUE DILIGENCE RESPONSES

Site specific responses to DPE due diligence questions

1	Will the activity disturb the ground surface or any culturally modified trees?	Proceed to question 2
	Yes, it will disturb the ground surface. No culturally modified trees present within the subject area.	
2a	Are there any relevant confirmed site records or other associated landscape feature information on AHIMS?	Proceed to question 2b
	No.	
2b	Are there any other sources of information of which a person is already aware? (Including whether or not the subject area is 'Disturbed Land' as defined in the Code ?)	Proceed to question 2c.
	Yes, the subject area is within 'Disturbed Land.'	
2c	Are there any landscape features that are likely to indicate presence of Aboriginal objects?	Proceed to question 3
	No.	
3	Can harm to Aboriginal objects listed on AHIMS or identified by other sources of information and/or can the carrying out of the activity at the relevant landscape features be avoided?	Proceed to question 4.
	No.	
4	Does a desktop assessment and visual inspection confirm that there are Aboriginal objects or that they are likely?	
	No.	