

Aimee Taylor  
 Senior Development Manager  
 Fabcot Pty Ltd  
 By email: ataylor12@woolworths.com.au

**RE: REQUEST FOR INFORMATION FOR ABORIGINAL CULTURAL HERITAGE ASSESSMENT AT 262 HAKONE ROAD, WARNERVALE, NEW SOUTH WALES**

Dear Aimee,

Fabcot Pty Ltd received feedback from Heritage NSW in November 2024 with regard to the project at 262 Hakone Road, Warnervale, New South Wales. The feedback was provided following review of a pre-testing Aboriginal Cultural Heritage Assessment (ACHA) finalised by Austral Archaeology in 2024. Since that time, Fabcot has maintained engagement of Austral, and further works for assessment and investigation of Aboriginal archaeology have been undertaken. Austral wishes to provide an update on the ACHA process and respond to Heritage NSW feedback below.

Please note the pre-testing ACHA is available upon request, and the post-testing ACHA is currently within the Stage 4 consultation stage, which is set to end on 29 May 2025.

HNSW comment (summarised)	Austral response
1. Distribute ACHA to RAPs for Stage 4 consultation; update accordingly to finalise	The pre-testing ACHA was distributed to RAPs on 30 September 2024. One response was received, and ethnographic information in the report was updated accordingly.
2. Provide documentation of consultation Stages 1 and 4	Stages 1 to 4 of consultation are attachments to the pre-testing ACHA.
3. Clarify if Worimi is a RAP	No response was received from Worimi following transmission of the additional consultation documentation. Worimi is a RAP.
4. Update Section 2 to include consultation dates	Section 2 has been updated to include Stage 4 consultation dates.
5. Conduct test excavations in two areas of moderate potential	Test excavations within these two areas were undertaken between 24 February and 11 March 2025. A testing program based on a 20-metre grid was undertaken and identified three archaeological sites. These results are discussed in the post-testing ACHA.
6. Register all sites on AHIMS	All PADs and verified subsurface deposits have been registered on AHIMS as part of the post-testing ACHA compilation.
7. Clarify whether 'northern PAD' will be impacted; register area on AHIMS	The 'northern PAD' is not proposed to be impacted at this time, however the PAD was tested at Fabcot's request, and an archaeological site was identified and registered on AHIMS.

HNSW comment (summarised)	Austral response
8. Inconsistent landform descriptors	Landform descriptions have been updated to reflect the geomorphic landforms. The landform wording is consistent across the environmental context, predictive modelling, survey and text excavation discussion sections of the post-testing report.
9. Update environmental context information	The environmental context has been updated to the Northern Sydney bioregion, reflecting the accurate context of the study area. The soil landscape and geology sections have also been updated with the relevant information within the ACHA.
10. Update ACHA with recommended previous studies	The ACHA has been updated with the recommended previous studies, including reports completed for the study area. The results of these previous reports have been incorporated into the updated recommendations of the ACHA.
11. Update legislative process information	The relevant legislation has been updated to reflect the project approval pathway. The report now clearly indicates that the project was originally prepared under a Part 3A approval and is now in the process of a Modification Application under Part 4, Section 4.55 of the EP&A Act, before a State Significant Development (SSD) application.
12. Update national Parks and Wildlife version reference	The report now consistently refers to the National Parks and Wildlife Regulations' current 2019 version throughout.
13. Adhere to SSD approvals	Mention of Aboriginal Heritage Impact Permits (AHIPs) has been removed from the report as it is being prepared as an SSD. Recommendations appropriate to an SSD have been included in the post-testing report.

As these RFI items have been completed or are nearly complete, Austral supports conversion of any outstanding RFI items into conditions of consent as the approvals process progresses.

Please do not hesitate to contact me for further information at the contact details provided below.

Yours sincerely,



Lindsay Costigan

Senior Archaeologist / Team Leader – Eastern Region

Austral Archaeology Pty Ltd

ABN: 55 629 860 975

M: 0402 745 058

E: [lindsayc@australarch.com.au](mailto:lindsayc@australarch.com.au)