Project Atlas – 10 Roberts Road, Eastern Creek (SSD-101067971)

Aboriginal Cultural Heritage Assessment Report

Report to Goodman Property Services (Aust) Pty Ltd

January 2026

artefact

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EXECUTIVE SUMMARY

Project overview

Artefact Heritage and Environment have been engaged by Goodman Property Services (Aust) Pty Ltd (the proponent) to prepare an Aboriginal Cultural Heritage Assessment Report (ACHAR) for the Project Atlas Data Centre development proposal at 10 Roberts Road, Eastern Creek, NSW (the study area). The study area is legally described as Lot 553 in Deposited Plan 71110447. The study area is located within the boundaries of the Blacktown Local Government Area, the Deerubbin Local Aboriginal Land Council, and is within Darug Country. The Project Atlas data Centre development proposal would include the construction and ongoing operation of a data centre facility and associated Offsite Enabling Infrastructure.

The development proposal has been declared State Significant Development (SSD–101067971) under the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Secretary's Environmental Assessment Requirements (SEARs) issued on 16 January 2026 outline that Aboriginal Cultural Heritage assessment would be required to inform the Environmental Impact Statement (EIS) for the development proposal. This ACHAR meets the Aboriginal Cultural Heritage requirements of the project SEARs:

SEAR	Documentation	Response
Aboriginal Cultural Heritage		
• Aboriginal Cultural Heritage – unless otherwise agreed in writing by Heritage NSW, include an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with the Code of Practice for Archaeological Investigation in NSW (DECCW, 2010), and the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (OEH, 2011). The ACHAR must: ▪ identify, describe and assess impacts on the Aboriginal cultural heritage values that exist across the development site ▪ provide evidence and details of adequate and continuous consultation with Aboriginal people in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010) ▪ include results of an archaeological survey and test excavations (where required), undertaken in accordance with the relevant guidelines.	• Aboriginal Cultural Heritage Assessment Report	This ACHAR meets the Aboriginal Cultural Heritage requirement of the project SEARs.

In order to satisfy the Aboriginal Cultural Heritage requirements of the project SEARs, an Aboriginal Archaeological Technical Report (ATR) prepared in accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010)* (the Code of Practice) has been appended to this report (see Appendix A – Archaeological Technical Report).

This ACHAR considers the impacts of the development proposal on Aboriginal cultural heritage within the study area. It is also informed by the ATR previously prepared by Artefact Heritage, which will also be submitted as part of the State significant Development application process.

The cultural heritage assessment includes:

- Assessment of the Aboriginal cultural heritage values of the study area and identification of any specific areas of cultural significance
- Assessment of archaeological potential in the study area
- The results of archaeological survey and the Aboriginal test excavation program within the study area
- Aboriginal stakeholder consultation.

The previously prepared ATR did not identify any known Aboriginal sites or objects within the study area and assessed that they were unlikely to be present. Based on the environmental background of the study area, as well as previous archaeological investigations, the following predictive statements were prepared:

- Identification of artefact sites will be dependent on visibility, per M2A (2021). Isolated artefacts and scatters will be easier to identify in surface exposures KNC (2019)
- Areas of PAD, and artefact sites are more likely to be located in areas of relatively minimal disturbance
- Areas of nil-low archaeological potential will be associated with extensive disturbance, per Artefact (2020 and 2022b), which assessed the paved road surface of Aldington Road and the adjacent verges as being of nil to low archaeological sensitivity and the eastern portion of the study area as having no Aboriginal archaeological potential
- Higher density sites are more likely to occur in proximity to permanent water sources, typically third order tributaries or higher, per the Cumberland Plain predictive model (White & McDonald 2010). As Ropes Creek constitutes a permanent water source, higher density sites and areas of PAD are likely to be present in proximity to this water source, per EMM (2020)
- Elevated landforms, including crests, ridges and hilltops are likely to contain high densities of Aboriginal cultural material, per the Cumberland Plain Predictive model, and Total Earth Care (2007)
- Extensive vegetation clearance associated with ongoing development of the broader area is likely to have affected the survival of any mature native trees, therefore the potential for Culturally modified trees is nil-low, as indicated by an AHIMS search of the surrounding area
- The potential for shelter sites, rock engravings and axe grinding grooves is limited by the landscape context and lack of exposed rock surfaces, per AHIMS Search results. Therefore, the potential for these site types is nil-low.

A subsequent archaeological survey confirmed the study area has been subject to significant historical disturbance.

Consultation with Registered Aboriginal Parties (RAPs) who registered their interest in the project was also conducted as part of this Aboriginal Cultural Heritage Assessment Report. A total of 21 RAPs registered their interest in the project. RAP consultation and their cultural contributions have been outlined in this report.

Summary of findings

The ACHAR has made the following conclusions through a combination of desktop assessment, archaeological survey and community consultation:

- The background research identified no registered AHIMS sites were located within the study area
- The study area has been subject to varying levels of disturbance which include, vegetation clearing, road construction, quarrying, large scale earthworks, construction of a large warehouse and substations
- The study area is not within an area of high Aboriginal archaeological potential as outlined in the Blacktown Development Control Plan 2015
- No Aboriginal objects or areas of potential for Aboriginal objects were identified during the archaeological survey and background research
- While the broader landscape around the Greater Western Sydney region possesses Aboriginal cultural heritage values, no specific cultural values have been identified in association with the study area
- While the development proposal would result in ground disturbance throughout the study area, there is no evidence that the works would cause harm to Aboriginal sites.

Recommendations

Based on the findings, the following recommendations and mitigation measures are made:

- No further assessment or mitigation measures are necessary due to the absence of Aboriginal objects, sites and cultural heritage values for the study area, and the lack of potential for Aboriginal objects to be present
- Ongoing consultation with the RAPs would continue throughout the life of the project, if necessary. For example, ongoing consultation with RAPs would take place in the event of any unexpected Aboriginal objects being identified during the proposal
- A heritage induction including an Unexpected Finds Procedure should be prepared and all workers should be inducted prior to the commencement of works
- This ACHAR must be submitted as part of the EIS to fulfil the requirements of the project SEARs
- Where there are changes to the project area or development proposal, additional archaeological assessment may be required
- A copy of this report should be sent to the Deerubbin Local Aboriginal Land Council.

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NOTE ON LANGUAGE IN QUOTES

A number of quotes used in this report come from documents written in the nineteenth and twentieth centuries by European observers. They have been included because they provide information on the lives of Aboriginal people in the region, though the language used and views expressed by these writers can be offensive and distressing.

GLOSSARY OF TECHNICAL TERMS

Aboriginal cultural heritage: The material (objects) and intangible (mythological places, dreaming stories etc) traditions and practices associated with past and present-day Aboriginal communities.

Aboriginal object: Any deposit, object or material evidence (not being a handicraft made for sale), including Aboriginal remains, relating to the Aboriginal habitation of NSW.

Aboriginal place: Any place declared to be an Aboriginal place under s.94 of the *National Parks and Wildlife Act 1974*.

AHIMS: Acronym for **'**Aboriginal heritage information management system'. AHIMS is a register that contains information about NSW Aboriginal heritage, and it is maintained by DECCW.

Archaeological object: any object that was made, affected, used, or modified in some way by humans in the past and has been discarded.

Archaeology: The scientific study of human history, with focus on material remains and ethnographic evidence.

Area of archaeological sensitivity: A part of the landscape that contains demonstrated occurrences of cultural material. The precise level of sensitivity will depend on the density and significance of the material.

Artefact: An item of cultural material created by humans.

Artefact scatter: Where two or more stone artefacts are found within an area of potential archaeological deposit or a site.

Easting: This is a measurement used to determine location. The easting is the x-coordinate and relates to the vertical lines on a map, which divide east to west. It increases in size when moving further east.

Exposure: The level of ground exposure is based on whether the landform is eroding, aggrading or stable. Exposure may occur naturally in creek and riverbanks, land slips, wind-eroded dune faces or other such naturally formed vertical profiles, or be formed artificially, for example in road and railway cutting

Layer: In stratigraphy, it is used to describe a horizon (soil, rock, charcoal) that is distinct from its surrounds.

Northing: This is a measurement used to determine location. The northing is the y-coordinate and relates to the horizontal lines on a map, which divide north to south. It increases in size when moving further north.

Potential Archaeological Deposit (PAD): A PAD is a location that is considered to have a potential for subsurface cultural material. This is determined from a visual inspection of the site, background research of the area and the landform's cultural importance.

Survey: In archaeological terms, this refers to walking over a surface while studying the location of artefacts and landmarks. These are then recorded and photographed.

Visibility: Is the amount of bare ground (or visibility) on the exposures which might reveal artefacts or other archaeological materials. Things like vegetation, plant or leaf litter, loose sand, stony ground or introduced materials will affect the visibility.

1.0 INTRODUCTION

1.1 Project brief

Artefact Heritage and Environment (Artefact Heritage) have been engaged by Goodman Property Services (Aust) Pty Ltd (the proponent) to prepare an Aboriginal Cultural Heritage Assessment Report (ACHAR) for the Project Atlas Data Centre development proposal at 10 Roberts Road, Eastern Creek, NSW (the study area). The study area is legally described as Lot 553 in Deposited Plan 71110447. The study area is located within the boundaries of the Blacktown Local Government Area (LGA), the Deerubbin Local Aboriginal Land Council (LALC), and is within Darug Country (see Section 1.2 for detailed description of study area). The Project Atlas Data Centre development proposal would include the construction and ongoing operation of a data centre facility and associated Offsite Enabling Infrastructure, as detailed in Section 7.1.

The development proposal has been declared State Significant Development (SSD–101067971) under the *Environmental Planning and Assessment Act 1979* (EP&A Act). The Secretary's Environmental Assessment Requirements (SEARs) issued on 16 January 2026 outline that Aboriginal Cultural Heritage assessment would be required to inform the Environmental Impact Statement (EIS) for the development proposal. This ACHAR has been prepared to meet the Aboriginal Cultural Heritage requirements of the project SEARs:

Table 1: Aboriginal Cultural Heritage requirements of the project SEARs

SEAR	Documentation	Response
Aboriginal Cultural Heritage		
• Aboriginal Cultural Heritage – unless otherwise agreed in writing by Heritage NSW, include an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with the Code of Practice for Archaeological Investigation in NSW (DECCW, 2010), and the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (OEH, 2011). The ACHAR must: ▪ identify, describe and assess impacts on the Aboriginal cultural heritage values that exist across the development site ▪ provide evidence and details of adequate and continuous consultation with Aboriginal people in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010) ▪ include results of an archaeological survey and test excavations (where required), undertaken in accordance with the relevant guidelines.	• Aboriginal Cultural Heritage Assessment Report	This ACHAR meets the Aboriginal Cultural Heritage requirement of the project SEARs.

In order to satisfy the Aboriginal Cultural Heritage requirements of the project SEARs, an Aboriginal Archaeological Technical Report (ATR) prepared in accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010)* (the Code of Practice) has been appended to this report (see Appendix A – Archaeological Technical Report). The ATR has informed the ACHAR and will also be submitted as part of the SSD application process.

1.2 Description of the study area

The study area is located at 10 Roberts Road, Eastern Creek, legally referred to as Lot 553 DP1110447 with Offsite Enabling Infrastructure (OEI) proposed across Lot 21 DP1246626, Lot 20 DP1157491, and Lot 22 DP1246626 to connect to TransGrid's Sydney West Substation and Switchyard (refer to Figure 1 below). The study area is located within the boundaries of the Blacktown LGA and is also within the boundaries of the Deerubbin LALC, and is within Darug Country.

The Data Centre site has a land area of approximately 168,574 m^2. The study area is identified as part of the Eastern Creek Precinct Stage 3 within the Western Sydney Employment Area. It is located approximately 35 km of the Sydney Central Business District (CBD) and 5.1 km from Rooty Hill Train Station. The study area has a site area of approximately 17 hectares and is bounded by industrial development and has a primary frontage of 400 m to Roberts Road. The existing site contains an industrial warehouse and surrounding hard-stand areas.

Surrounding land uses in the vicinity include:

- Northeast: A range of mixed-use industry & commercial buildings
- Southeast: Data Centre and substation
- South, southwest and west: land primarily owned and operated by TransGrid Sydney
- Northwest: Commercial industry and the Industrial Harvest café.

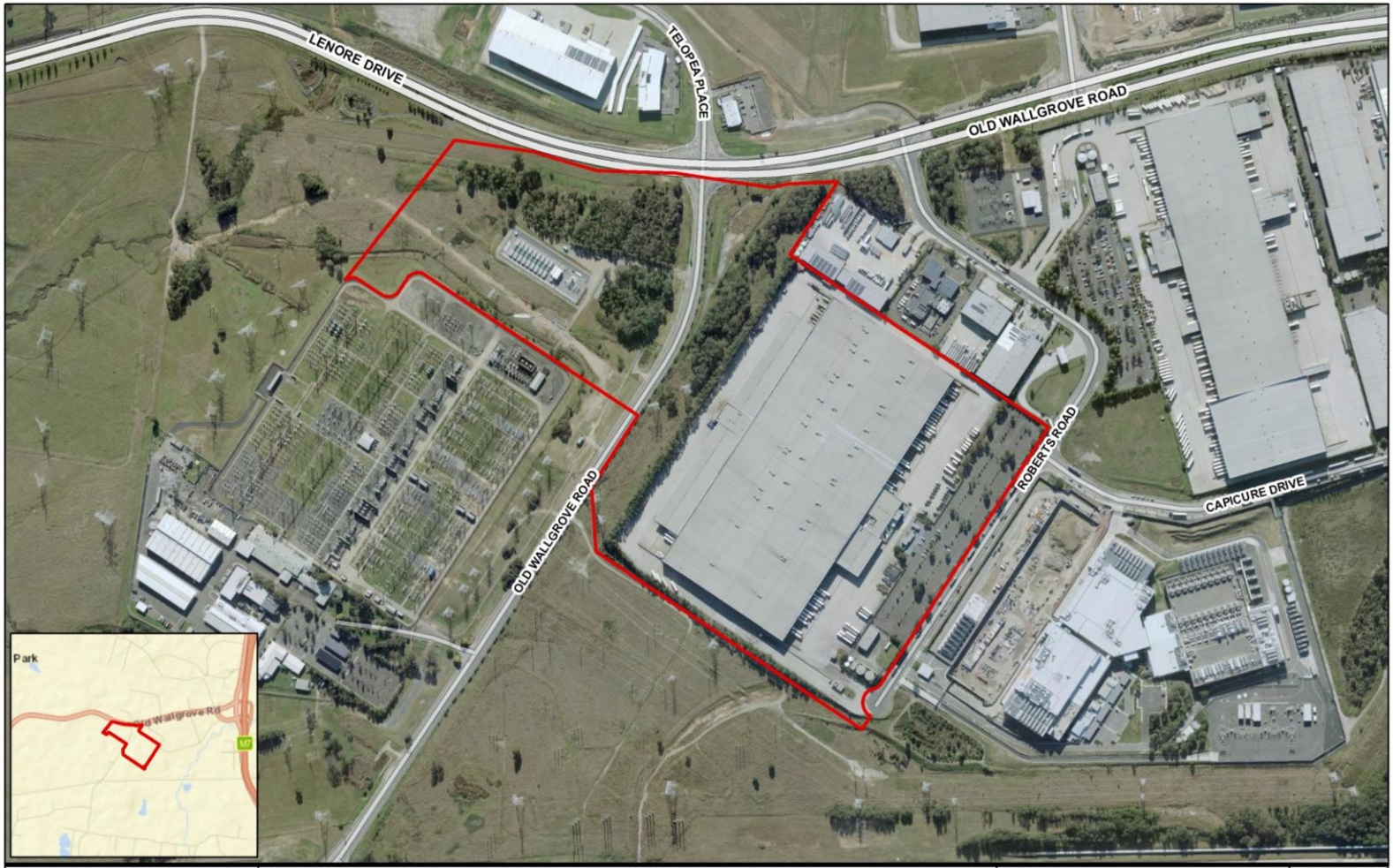
The site is zoned IN1 General Industrial within Chapter 2 Western Sydney Employment Area of State environmental Planning Policy (Industry and Employment) 2021 (IESEPP). The proposal is permissible with development consent in the IN1 zone as per the State Environmental Planning Policy (Transport and Infrastructure) 2021 (TISEPP).

A summary of key features for the site and surrounding context are also summarised in Table 2 below.

Table 2: Summary of Key Features

Item	Description
Site Area	Data Centre – 168,574 m^2
Ownership	Goodman
Legal Description	Data Centre - Lot 553 DP1110447 OEI – Lot 21 DP1246626, Lot 20 DP1157491, and Lot 22 DP1246626

Figure 1: Location of the study area



1.3 Aims and objectives

This ACHAR aims to identify and assess the Aboriginal heritage values of the study area, consult with Aboriginal stakeholders in this process and present the results of the archaeological investigation completed in the ATR. The report will be included in the EIS used to inform the SSD application for the project, satisfying the requirements of the SEARs.

The objectives of this report are to:

- Identify any Aboriginal cultural values in and around the study area
- Assess these cultural values, as related to the study area, through consultation with Aboriginal stakeholders
- Assess the impacts the proposed development might have on Aboriginal cultural heritage and potential archaeological resources within the study area
- Document the process and outcomes of Aboriginal stakeholder consultation
- Provide a plain English summary of the results of the ATR to Registered Aboriginal Parties (RAPs).

1.4 Statutory framework

This ACHAR has been prepared to comply with the requirements of the Aboriginal Cultural Heritage SEAR requirements of the SSD which outline that the proponent must prepare an ACHAR.

To satisfy these requirements, this report has been prepared using the following guidelines:

- *Code of Practice for Archaeological Investigations of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change & Water 2010b); hereafter the Code of the Practice
- *Guide to Investigations, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011); hereafter the Guide
- *Aboriginal cultural heritage consultation requirements for proponents 2010* (Department of Environment, Climate Change & Water 2010a); hereafter the Consultation Requirements

The full legislative context for this assessment can be found in the ATR prepared alongside this report, which is contained within the Appendices (Appendix A – Archaeological Technical Report).

2.0 SUMMARY OF CONSULTATION

2.1 Stage 1

2.1.1 Agency letters

In accordance with Section 4.1.2 of the Consultation Requirements, Artefact Heritage corresponded with the following organisations by email on 8 October 2025 requesting the details of Aboriginal people who may hold cultural knowledge relevant to determining the Aboriginal significance of Aboriginal objects and/or places within the local area:

- Heritage NSW
- Native Title Service Corporation (NTSCorp)
- National Native Title Tribunal
- Office of the Registrar, Aboriginal Land Rights Act 1983
- Blacktown City Council
- Deerubbin Local Aboriginal Land Council (LALC)
- Greater Sydney Local Land Services

The due date for responses was 22 October 2025.

2.1.2 Advertisement

In accordance with Step 4.1.4 of the Consultation Requirements, an advertisement was placed online in The Daily Telegraph for publication on 23 October 2025. The publication invited the participation of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places within the local area, requesting their response by 6 November 2025.

2.1.3 Registration of Aboriginal parties

In accordance with Step 4.1.3 of the Consultation Requirements, invitations to register an interest in the project were sent by email to all those people identified through contacting the agencies on 23 October 2025, with a response requested by 6 November 2025. The letters provided details about the location and nature of the proposed development and an invitation to register as an Aboriginal stakeholder.

It is noted that Sue Galt from the Blacktown City Council responded to the Agency Letter request for information about Aboriginal stakeholders in the area on 28 October 2025. Blacktown City Council had responded to the original Agency Letter sent to relevant organisations on 23 September 2025 and not the updated letter sent on 8 October 2025 (see Section 2.1.1 above). The original Agency Letter was to contact agencies on 23 September 2025 for the original study area which has since been substantially increased in size. For this reason, Artefact Heritage had restarted consultation on 8 October 2025 with the amended study area to ensure the correct area had been assessed. As this email from Blacktown City Council with the relevant Aboriginal stakeholders was received after the revised date of 22 October 2025 for information requested by the relevant agencies, the list of Western Sydney Aboriginal stakeholder groups compiled by the Council were not sent the Registration of Interest (RoI) letter on 23 October 2025. This was corrected by sending the list of Western Sydney Aboriginal stakeholder groups compiled by Blacktown City Council the RoI letter on 11 November 2025, with a response requested by 25 November 2025.

This information and the late response by Blacktown City Council has been included in the Consultation Log and Records (see Appendix B – Consultation Log and Records) and has been collected for record keeping purposes and to ensure consultation was compliant with the Consultation Requirements.

As a result of the Agency Letters, advertisement, and RoI letters, a total of 21 individuals / organisations registered their interest in the project including the Deerubbin LALC who have been consulted with at all stages of the project. Carolyn Hickey (A1 Indigenous Services) was not part of the Aboriginal stakeholder list provided by Heritage NSW in response to the request for agency information (see Section 2.1.1). However, Carolyn Hickey was informed of the project by a family member and requested to be registered as an Aboriginal stakeholder on 17 November 2025 after the RoI due date which was 6 November 2025.

The list of Registered Aboriginal Parties (RAPs) who registered for this project are listed below in Table 3.

Table 3: List of Registered Aboriginal Parties (RAPs)

Organisation	Contact
Long Gully Cultural Services	Ethan Trewlynn
Didge Ngunawal Clan	Lilly Carroll
Guugaburra Yiramiilan	Steven Carroll
Wallanbah Aboriginal Site Conveyancing	Kelvin Boney
Yurrandaali	Bo Field
Paul Bell Indigenous Site Specialist	Paul Bell
Wurrumay Cultural Heritage Consultants	Vicky Slater
Wori Wooilywa	Daniel Chalker
Bariyan Cultural Connections	Kayelene Slater
Wailwan Aboriginal Group	Philip Boney
Deerubbin LALC	Kayne Moreton
Guntawang Aboriginal Resources Incorporated	Wendy Morgan
Corroboree Aboriginal Corporation	Marilyn Carroll-Johnson
Butucarbin Aboriginal Corporation	Jenny Beale
Murra Bidgee Mullangari Aboriginal Corporation	Darleen Johnson
Merrigan	Shaun Carroll
Meryhuiela	Lee Carroll
Yulay Cultural Services	Arika Jalomaki
Amanda Hickey Cultural Services	Amanda Hickey

Organisation	Contact
Kamilaroi Yankuntjatjara Working Group	Phil Khan
A1 Indigenous Services	Caroyln Hickey

In accordance with Section 4.1.6 of the Consultation Requirements, the list of the RAPs for the project was issued to Heritage NSW and Deerubbin LALC on 10 December 2025. As the revised closing date for registering as a stakeholder for the project was 25 November 2025, this notification to Heritage NSW and Deerubbin LALC was compliant with the 28 day period.

2.2 Stage 2

Stage 2 of the consultation process is to provide RAPs with information about the scope of the proposed project and the proposed cultural heritage assessment process. To satisfy Stage 2 and 3 of the Consultation Requirements, an ACHAR methodology was prepared that included relevant project information and the details are outlined in Section 2.3. This consultation facilitates a process whereby RAPs can contribute to culturally appropriate information gathering and the research methodology, provide information that will enable the cultural significance of Aboriginal objects and/or places within the project area to be determined, and have input into the development of any cultural heritage management options.

2.3 Stage 3

2.3.1 ACHAR assessment methodology

A copy of the proposed assessment methodology was sent to the RAPs by email on 11 November 2025, requesting feedback by 9 December 2025. The draft assessment methodology presented information about the project and invited feedback on the cultural significance of the area.

Carolyn Hickey (A1 Indigenous Services) was sent the ACHAR assessment methodology letter on 18 November 2025 due to a late registration (see Section 2.1.3).

A summary of the comments received by the RAPs is presented in Table 4.

Table 4: Summary of Aboriginal stakeholder comments on the Assessment Methodology

Contact / RAP Organisation	Comment	Response
Marilyn Carroll-Johnson (Corroboree Aboriginal Corporation)	Expressed interest in the project.	Acknowledged via email and included in the ACHAR Log and Records. We noted that comments on the methodology were also welcomed.
Ethan Trewlynn (Long Gully Cultural Services)	Supports information and methodology.	Acknowledged via email and included in the ACHAR Log and Records.
Lilly Carroll (Didge Ngunawal Clan)	Noted that they were previously involved in the project across Australia's Wonderland along Wallgrove Road. Lilly commented	Acknowledged via email and included in the ACHAR Log and Records. We noted that the current study area is near the old

Contact / RAP Organisation	Comment	Response
	that a salvage excavation was managed in this area in 2025 and that this was a gathering area. Lilly noted that they were happy with the methodology.	Wonderland site and that this report would inform our assessment.
Paul Bell (Paul Bell Indigenous Site Specialist)	Supports information and methodology.	Acknowledged via email and included in the ACHAR Log and Records.
Shaun Carroll (Merrigan)	Supports information and methodology.	Acknowledged via email and included in the ACHAR Log and Records.
Phil Khan (Kamilaroi Yankuntjatjara Working Group)	Supports information and methodology.	Acknowledged via email and included in the ACHAR Log and Records.
Wendy Morgan (Guntawang Aboriginal Resources Incorporated)	Guntawang supports and agrees with the draft methodology for the proposed development.	Acknowledged via email and included in the ACHAR Log and Records.
Carolyn Hickey (A1 Indigenous Services)	Supports information and methodology.	Acknowledged via email and included in the ACHAR Log and Records.
Darleen Johnson (Murra Bidgee Mullangari Aboriginal Corporation)	Supports information and methodology.	Acknowledged via email and included in the ACHAR Log and Records.

2.4 Stage 4

A copy of the draft ACHAR was sent to the RAPs by email on 17 December 2025, requesting feedback by 15 January 2026. A summary of comments received by the RAPs is provided in Table 5.

Table 5: Summary of Aboriginal stakeholder comments on the draft ACHAR

Person/ RAP group	Comment	Response
Wendy Morgan (Guntawang Aboriginal Resources Incorporated)	"Guntawang Aboriginal Resources Inc. support the ACHAR process for the Proposed development at 10 Roberts Road, Eastern Creek. We would like to see if any Aboriginal Objects or Artefacts are recovered from this land scape be returned to a safe place away from future construction."	"Thank you for your comments and for your support of the ACHAR. We note that the ACHAR has a recommendation for consultation with RAPs in the event that any expected Aboriginal objects are identified. This consultation would likely result in a reburial of objects in an area that would not be subject to development in perpetuity, as per your comment."
Darleen Johnson (Murra Bidgee Mullangari Aboriginal Corporation)	"I have read the project information and ACHAR for the above project, I endorse the recommendations."	Acknowledge via email and included in the ACHAR and Log and Records.

Person/ RAP group	Comment	Response
Amanda Hickey (Amanda Hickey Cultural Services)	"I have read & fully support the ACHAR & the low potential for artefacts in the study area due to historical disturbance."	Acknowledge via email and included in the ACHAR and Log and Records.
Kelvin Boney Wallanbah Aboriginal Site Conveyancing	"I Kelvin Boney fully support the Draft ACHA report Re:10 Roberts RD Eastern Creek Lot 553 DP71110447 within saying that I believe that this part of traditional land will be identified and protected"	Acknowledged via email and included in the ACHAR Log and Records.
Phil Khan (Kamilaroi Yankuntjatjara Working Group)	"Thank you for your ACHAR for 10 Roberts Road, Eastern Creek, legally described as Lot 553 DP 71110447, we would like to agree and support your recommendations."	Acknowledged via email and included in the ACHAR Log and Records.
Arika Jalomaki Yulay Cultural Services	"Thank you for your email."	Acknowledged via email and included in the ACHAR Log and Records.

3.0 SUMMARY AND ANALYSIS OF BACKGROUND INFORMATION

3.1 Archaeological background

Numerous Aboriginal archaeological investigations have previously been undertaken within and within proximity to the study area. These relevant investigations are summarised in Table 6 and Table 7 below.

Table 6: Previous archaeological assessments within the study area

Report	Summary
State Environmental Planning Policy No. 59 – Central Western Sydney Economic and Employment Area (Blacktown City Council, 2005)	Blacktown City Council prepared a precinct plan in accordance with the provisions of *SEPP No 59 – Central Western Sydney Economic and Employment Area ('SEPP 59')* for land identified as Release Area 3 within the Eastern Creek Precinct. The Eastern Creek Precinct included 10 Roberts Road which is located within the eastern portion of the study area. As part of this precinct plan, areas of Aboriginal sensitivity were assessed. The assessment found an area of 'High sensitivity' for Aboriginal heritage was identified within 10 Roberts Road (eastern portion of the study area). This assessment was based on the limited historical disturbance within the area and its location on a crest landform. However, this area has since been subject to significant disturbance as part of the development of the extant industrial warehouse. Therefore, this area no longer has any archaeological potential. This SEPP has since been repealed and replaced with the SEPP (Industry and Employment) 2021.
Western Sydney Employment Hub Erskine Park Link Road Network, Aboriginal Heritage Review (Navin Officer 2008)	Navin Officer prepared an Aboriginal heritage assessment for a road network known as the Erskine Park Link Road Network (EPLR Network) in the Western Sydney Employment Hub. A portion of this assessment included areas to the east of Ropes Creek which contained the land within the study area and within its immediate vicinity. Their assessment identified no Aboriginal sites or PADs within the study area, but AHIMS ID 45-5-3842 'EPLR1 & PAD' was identified approximately 180m west of the study area. Additionally, a previously registered AHIMS site (AHIMS ID 45-5-3076) was also identified approximately 420m northeast of 10 Roberts Road. As this was identified as a 'Artefact, PAD' the PAD may have extended into the northern portion of the 10 Roberts Road study area. This site was identified as a low-density discontinuous distribution of subsurface artefacts which had low archaeological significance due to the high levels of disturbance within the area. Subsequently, the area was salvage and has been assessed to have no more archaeological potential due to extant development.
Aboriginal Heritage and Due Diligence assessment, Sydney West BSP to Lenore Drive (Artefact Heritage 2020)	In 2020, Artefact completed an Aboriginal Heritage Due Diligence (AHDD) for the proposed installation of a new 132 Kilovolt feeder. A section of the proposed installation ran through the western portion of the study area, immediately to the south of the Electrical substation. The report identified the study area was associated with low-lying land that has been subject to flooding and disturbance. It was assessed that any potential Aboriginal objects would have significantly impacted or destroyed. The report concluded that no further assessment was required, and the works could proceed under an Unexpected Finds Procedure.

Table 7: Previous archaeological assessments outside of the study area

Report	Summary
Archaeological Subsurface Investigations at SEPP59: EC3/1 (#45-5-32-01) and EC3/2 (#45-5-3202, Wonderland Surplus, Old Wallgrove Road, Eastern Creek (Jo McDonald Cultural Heritage Management Pty Ltd 2006)	In 2006, McDonald undertook salvage excavations at 'Wonderland Surplus', located approximately 750 m north of the study area. McDonald's study area comprised of two PAD – EC3-PAD 1 and EC3 PAD 2, as well as several other Aboriginal sites. McDonald assessed the study area to be relatively undisturbed but had been subject to vegetation clearance and agricultural activities which had increased erosion of the deposit. However, in other areas it was assessed that artefact material has moved due to post European slope wash covering remnant deposits. In total, 1550 lithic artefacts were identified, comprising primarily of silcrete (87%) but silicified tuff (8%), quartz (5%) and petrified wood was also present. McDonald assessed the assemblage to represent a 'slow accumulation of lithic discard over long time periods, as opposed to more intensive discard associated with tool production areas or domestic locations'.
Oakdale Concept Plan, Aboriginal Heritage Assessment, and Impact Assessment (GML 2007)	In 2007, GML completed an Aboriginal Heritage Assessment as park of the works for the Oakdale Concept Plan, located approximately 1.5km east of the study area. A total of eleven sites were identified during the survey including isolated finds and artefact scatters consisting primarily of silcrete. The sites were located within then northern portion of the Oakdale Concept Plan and were mostly located within exposures and excavated area near Ropes Creek and its tributaries. Additionally, six sites were identified within the Oakdale West portion of the Concept Plan and were concentrated along Ropes Creek. It was assessed that the area was unlikely to be an intense place of Aboriginal occupation, as the evidence suggested camping was more likely around larger reliable water sources, such as Eastern and South Creek. The area was also assessed to have been subject to clearing that reduced archaeological potential. However, test excavation and intensive surface survey were recommended in areas of subsurface archaeological potential.
Oakdale Central Aboriginal Archaeological Technical Report (GML 2013)	GML (2013) conducted test excavations along Ropes Creek within the Oakdale Central precinct. The distribution of artefacts along Ropes Creek and the across the hill slopes was compared. It was found that artefact densities were generally continuous closer to the creek, where artefacts were sparser within slope landforms.
The Northern Road Upgrade Mersey Road, Bringelly to Glenmore Parkway, Glenmore Park: Aboriginal Cultural Heritage Assessment Report (Kelleher Nightingale Consulting 2017)	In 2017, Kelleher Nightingale Consulting (KNC) prepared an ACHAR for 16km of road upgrades to the Northern Road between Mersey Road, Bringelly and Glenmore Parkway, Glenmore Park, primarily located to the west of the study area. The report identified 28 AHIMS sites within the study area including low to moderate artefact scatters and isolated finds. The majority of these sites were identified as having moderate significance. The sites were interpreted to relation transitional activities and formed part of an Aboriginal cultural highway.
Oakdale Industrial Estate, Oakdale West, Kemps Creek. Aboriginal Test Excavation Report (Artefact 2019)	In 2019, Artefact conducted test excavations within the Oakdale West Industrial Estate based on the findings of archaeological surveys carried out in 2015 and 2016. The area investigated lies northwest of the study area. Three low-density scatters and two isolated finds were investigated, and it was concluded that all sites assessed represented deposits that were common across the Cumberland Plain. All sites were assessed as being of low scientific significance.

Report	Summary
Southern Link Road Wallgrove Road to Mamre Road, Horsley Park to Kemps Creek, NSW Aboriginal Archaeological Survey Report, Stage 2 PACHCI (Kelleher Nightingale Consulting 2019)	In 2019, KNC completed an Archaeological Survey Report (ASR) for a 7.5 km investigation area including Bakers Lane and Aldington Road, which is located southwest of the study area. The report identified one new silcrete artefact scatter site (AHIMS ID 45-5-5274). The site was located on a large exposure around the eastern margin of a dam. It was also identified that the area had been disturbed from developments, land clearance, flooding from large creeks and soil erosion and movement on steeper slopes and crest in the local area. It was assessed that there would be less archaeological evidence on minor creek lines than major creek lines due to the pattern of past Aboriginal land-use.
Mamre Road Precinct: Aboriginal Heritage Study (EMM Consulting 2020)	In 2020, EMM Consulting (EMM) completed an Aboriginal Heritage Study at the Mamre Road Precinct, approximately 3km southwest of the study area. That report included desktop and field survey results, which were comparable to other studies within the broader Cumberland Plain. All sites identified within the Mamre Road Precinct were found to be primarily located on the boundaries of main creek systems, and/or on a ridge line. One high density artefact scatter was identified on South Creek, while all other sites were isolated objects or low-density artefact scatters. Subsequent test excavations revealed that artefacts were typically located within shallow deposits.
Sydney Metro Western Sydney Airport. Aboriginal Archaeological Report (M2A 2021)	In 2021, M2A prepared an Aboriginal Cultural Heritage Assessment Report (ACHAR) and an Aboriginal Archaeological Report for works at the Western Sydney Airport. The proposed works included construction and operation of a new metro railway line, approximately 23km long, between the Aerotropolis Core to the south of the study area, and the T1 Western Line at St Marys to the north. 360 Aboriginal sites were identified within the study area. Further sites were identified during archaeological surveys undertaken in 2020. During inspections, feedback from RAP representatives indicated that waterways traversing the construction footprint hold cultural significance as both resource acquisition zones, and as pathways for Aboriginal people in the past. Between 2020 and 2021, additional surveys identified several more Aboriginal sites, however some of these were located outside the study area. Subsequent test excavations were undertaken across areas identified as having Aboriginal archaeological sensitivity. 22 test pits out of 196 test pits were found to contain Aboriginal objects, with a collective total of 42 identified lithic artefacts. The report stated that past disturbance and current landforms within the study area indicated that creeks within and/or adjacent to the construction footprint, including their tributaries contained archaeological potential. Areas of archaeological sensitivity, defined as part of this assessment were located approximately 5.8km metres west of the study area, in association with South Creek. Additional areas identified as containing subsurface Aboriginal archaeological sensitivity had not been subject to survey or test excavation due to access permissions at the time.
Aldington Road Aboriginal Cultural Heritage Assessment Report (Artefact 2022a), Report to Aldington Developments.	In 2022, Artefact completed test excavations the extent of Bakers Lane SLR AFT 1 (AHIMS ID 45-5-5274) and Aldington. Bakers Lane SLR AFT 1 (AHIMS ID 45-5-5274) by KNC in 2019. A total of one Aboriginal object was retrieved during the test excavation. Artefact noted that the results of the test excavation indicated that the area was unlikely to have been used as a campsite for a prolonged period of time, instead representing a transitory occupation area and a secondary resource zone. As a result of this predominantly negative testing, the site extent of Bakers Lane SLR AFT 1 (AHIMS ID 45-5-5274) had been reduced to exclude the area tested by Artefact in 2022.

Report	Summary
200 Aldington Road, Kemps Creek: Aboriginal Heritage Due Diligence Assessment (Artefact 2022b)	In 2022, Artefact completed an AHDD for the FKC Potable Water Lead-in at 200 Aldington Road, located 4.6km southwest of the study area. While no sites were identified within the study area, two sites were located within 200m of the study area. The study area was found to be situated within a sensitive landform feature, however, extensive disturbance associated with road construction and underground services was assessed as likely to have destroyed any areas of sensitivity associated with this landform and subsurface archaeological deposits. As the study area comprised of a paved road surface of Aldington Road and the adjacent verges, it was assessed as being of nil to low archaeological sensitivity. Artefact recommended that no require further archaeological investigation was required
769 Mamre Road, Kemps Creek – Data Centre Feeders: Archaeological Survey Report (Artefact 2023)	In 2023, Artefact completed an ASR for two underground transmission feeds with Kemps Creek, located approximately 70m southwest of the study area at its closest point. Seventeen previously recorded Aboriginal sites were identified within 50m of the feeder. Following an archaeological survey, eleven sites were recorded within 50 metres of Artefact's study area, but they would not be impacted by the works and or were likely to have destroyed or redeposited. However, several other AHIMS sites were located within or within close proximity to the study area. One of these sites (AHIMS ID 45-5-3231) was unregistered but previous identified by KNC in 2023 which would be directly harmed and partially destroyed by the works. As such, salvage excavation under an AHIP was recommended as the works could not be relocated

3.2 AHIMS search

A search of the Aboriginal Heritage Information Management System (AHIMS) was undertaken on 1 October 2025 for a search area measuring approximately 3 km x 2 km of land surrounding the study area. The search parameters were as follows:

GDA, Zone 56 [redacted]

A total of 35 AHIMS registered Aboriginal sites were identified within the search area (Figure 2). There are no registered sites within the study area. The closest AHIMS site identified in the search area was AHIMS ID 45-5-3842, which was located approximately 150m northwest of the study area and approximately 35m south of Lenore Drive (Figure 3).

By far, the most common site feature identified within the search area was 'Artefact' (n=26, 74.3%). When taken in total, site features containing 'Artefact' consisted of 82.9% (n=29) of all the AHIMS registered sites in the search area.

Overall, the AHIMS search revealed a pattern of sites following landforms located in proximity (<300m) to permanent freshwater water and typically within pastoral and relatively undeveloped land. The site distribution pattern is also a reflection of areas of historical land-use and of previous archaeological assessments within the local area.

Figure 2: AHIMS extensive search results

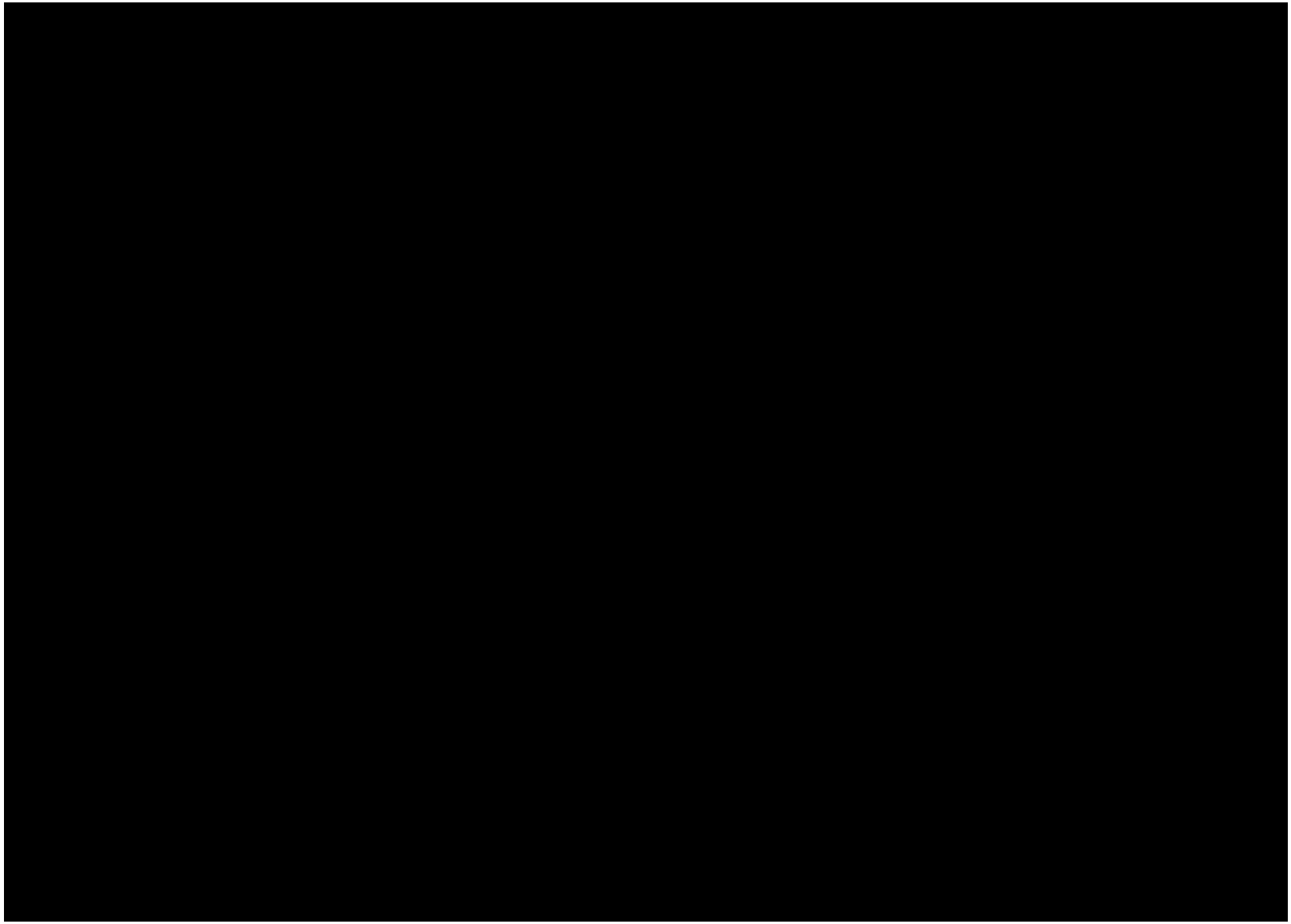
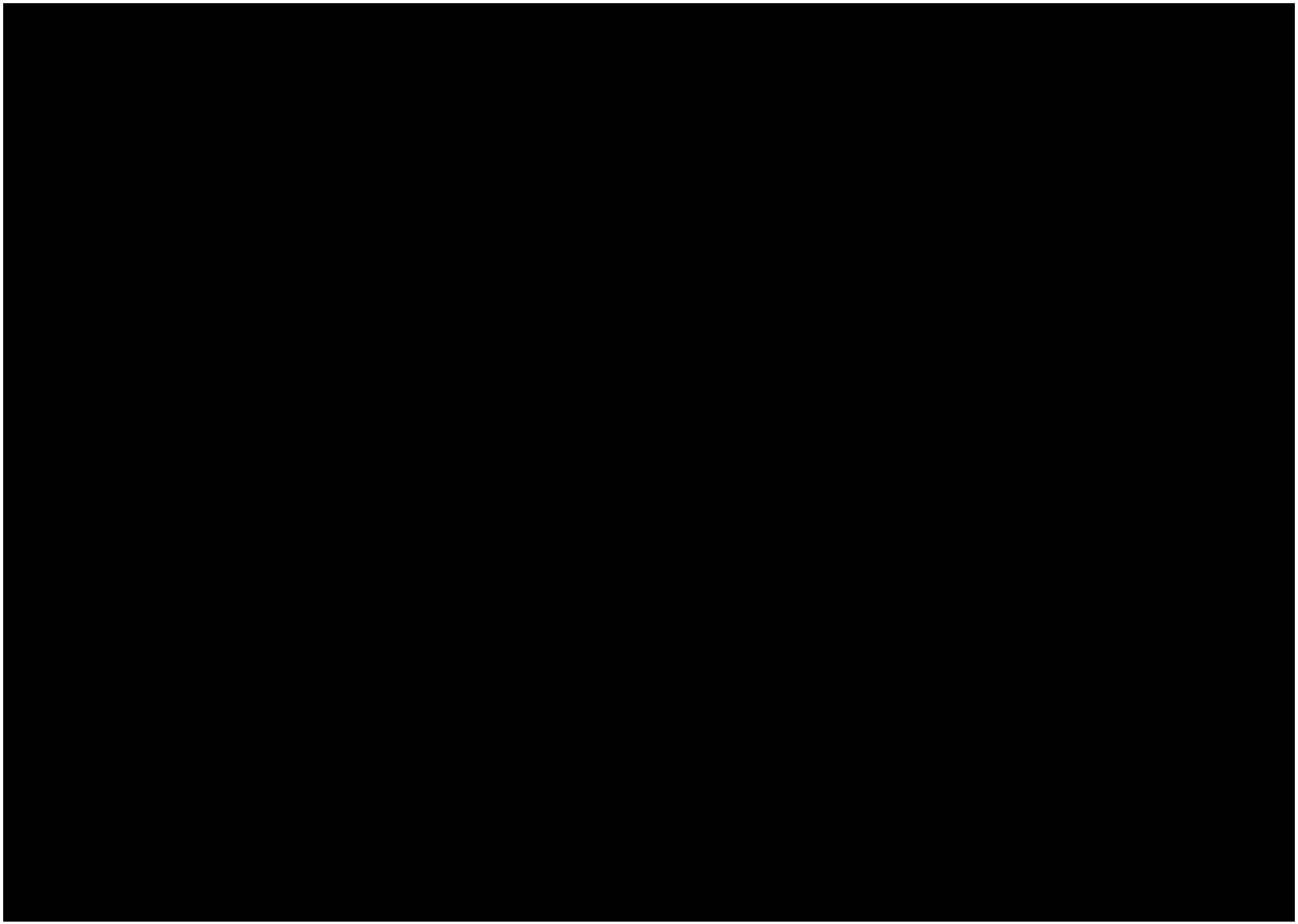


Figure 3: AHIMS detailed search results



3.3 Environmental background

3.3.1 Soils and geology

The study area is located within the Blacktown soil landscape with soil profiles that can range from shallow to moderately deep (Figure 4). Aboriginal objects within Blacktown soils are typically preserved within between a depth of 2mm-20mm meaning that even shallow disturbances to the soil, such as vegetation clearing, could impact Aboriginal objects. Furthermore, the shallowness of the deposits also make Aboriginal objects vulnerable to erosion.

The underlying geology of the study area is Bringelly Shale which is part of the Wianamatta Group. Materials used for stone tool production would vary depending on the location of the raw material sources. Stone types recorded on the Cumberland Plain in associated with the Wianamatta Group include silcrete, chert, indurated mudstone / tuff, quartz, quartzite and basalt (Smith 1989).

3.3.2 Hydrology and landforms

The study area is located approximately 150m east from an ephemeral tributary of Ropes Creek, while Ropes Creek is located 1.2km west of the study area. Rope's Creek itself, a tributary of Wianamatta (South Creek), which is located approximately 6 km west of the study area at its closest point. Comparatively, an ephemeral tributary of Reedy Creek is located approximately 450m north of the study area, and Reedy Creek is located 590m east of the study area. The ephemeral tributaries which traverse in close proximity to the study area would not have provided permanent water resources. Previous archaeological investigations across the Cumberland Plain suggest that artefact density will be higher in proximity to major watercourses, such as South Creek.

The natural topography of the study area and the region surrounding it consists of gentle undulating rises, with broad rounded crest and ridges and gently inclined slopes (eSPADE 2024) (Figure 5). The study area itself is located on the slopes of a crest, while the eastern corner of the study area is located on the majority of the hillcrest. However, the topography of the local area has been increasingly modified by historical developments, including the study area, which has resulted in slope cuts and leveling for building pads. Prior to landform modifications the landscape, the study area may have been suitable for local Aboriginal groups due to its higher ground, views and close proximity to water.

Figure 4: Soil landscape in relation to the study area

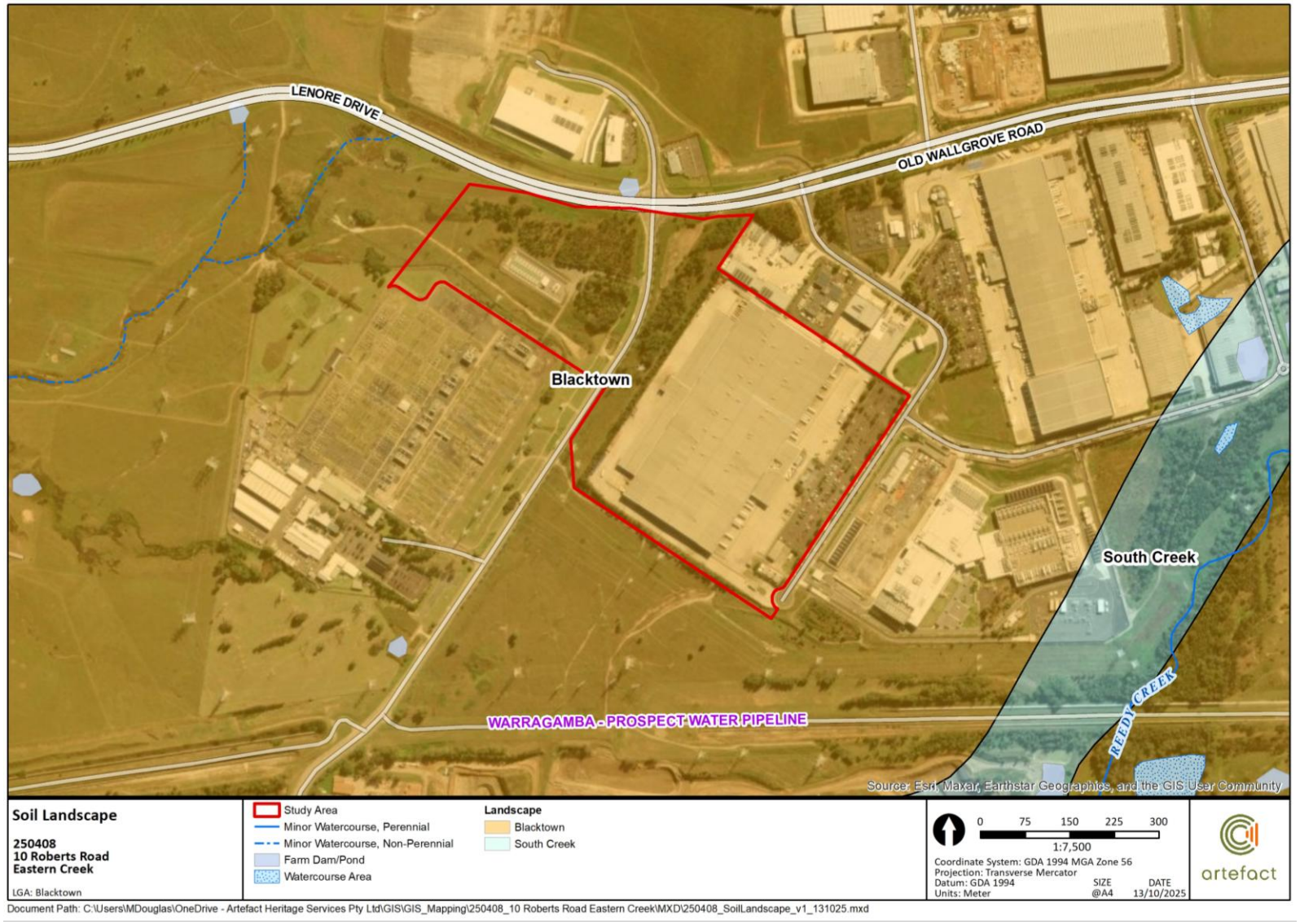
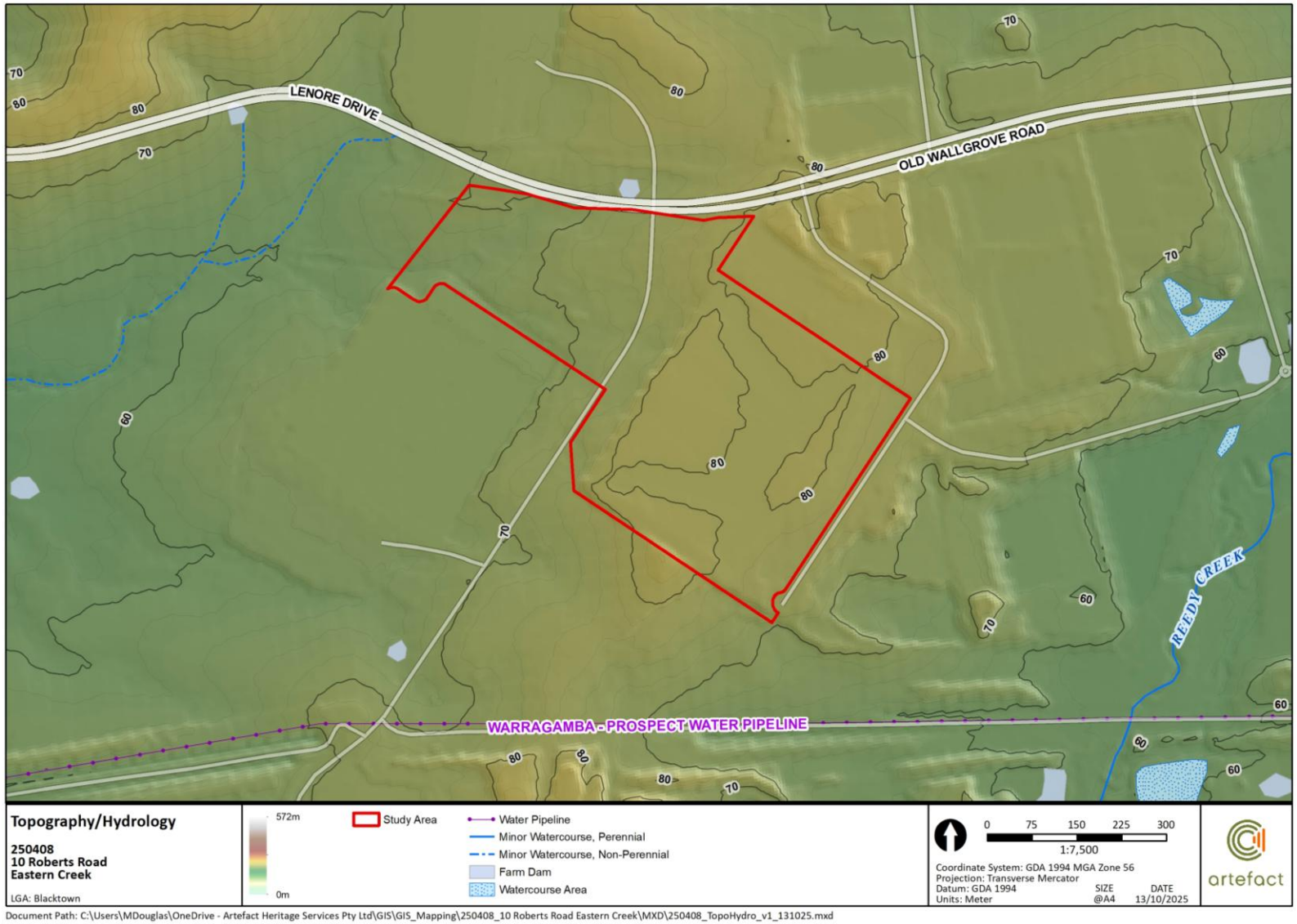


Figure 5: Topography and hydrology surrounding the study area



3.3.3 Historical land disturbance

3.3.3.1 Within the local area

European expansion throughout the Cumberland Plain displaced Aboriginal people from their traditional land and effectively cut off access to many resources. The first European activity in the area was exploratory; however, this was shortly followed by settlement. The first land grants in the Blacktown region were located at Prospect Hill. Governor Phillip granted a total of 13 plots to emancipated convicts in July 1791, ranging in size from 30 to 70 acres (Historical Records of NSW 1978).

Early residential settlement in the broader Fairfield/ Penrith area was driven by the availability of fertile soil and easily accessible water sources such as creeks and riverbeds. However, frequent flooding forced settlement to spread inland, to the east of the river. At this time, Eastern Creek became associated with smaller allotments, often given to emancipated convicts while land surrounding the study area-further inland and less fertile-was issued to free settlers in the form of large acreages (AMBS 2007).

European land use in the late 18th and early 19th century area primarily involved clearing of vegetation for agricultural purposes. Early maps and historical material suggest that once land grants were issued agricultural activity took place in the form of farming, cattle grazing and dairying. This settlement and agricultural activity in the early 19th century was sustained by the establishment of Richmond Road, located approximately 8.5km northeast of the study area. Accessibility of the region increased further with the advent of rail line extensions in the 1860s.

3.3.3.2 Within the study area

The area between Prospect and South Creek along the Western Highway was granted to free settlers and ex-convicts between 1818 and 1920 (GML 2014: 19). The earliest European land use of the study area and the surrounding vicinity was likely to have been associated with timber getting, grazing and pastoralism from the early 19th century onwards (AMBS 2007).

The mid-twentieth century saw the establishment of a transmission line through the properties to the Sydney West substation in the south which caused the division of the estates into the irregular lots they form now. A parish map (undated) shows the study area is located with land that was granted to John Campbell, William Hayes, Henry Stockfish, James Hayes, W. Bateman and W. Fairburn. John Thomas Campbell was known as a most efficient farmer and breeder of cattle and horses and owned several properties in the Sydney region including a property of 1,100 acres near Rooty Hill, which he named ‘Mount Philo’ (Holder 1966).

Comparatively, northeast of the study area, the land was granted to William Hayes in 1810. Overtime, Hayes land had increased to 900 acres, including the land acquired from Henry Stockfish, whose property is located within the north most section of the study area (EMA 2003, 9). Hayes cleared and fenced his property and additionally built a house consisting of 9 rooms and a kitchen, stables, offices and outbuildings; however, it is unknown where these structures were built (State Heritage Inventory, n.d.).

A review of the historical maps and aerials demonstrated that while the study area had been extensively cleared, it remained largely undeveloped from the 1930s to the early 2000s, with the exception of some roads (Figure 6 to Figure 10). However, an aerial from 1965 displays that adjacent to the study area, Sydney West TransGrid and substation had been constructed which resulted in localised disturbance within the southwestern corner of the study area (Figure 7). Subsequently, in 1991, Austral Brick Company began quarrying the land to the east of the study area for Bringelly shale-based clay. This quarrying had extended into the study area by 2004, and by 2005, the study

area had been subject to large scale earthworks for the construction of the distribution warehouse and road corridor which are within the study area (Figure 8 to Figure 10).

Figure 6: 1947 aerial overlay showing the study area had been subject to substantial land clearing (Spatial Collaboration Portal)

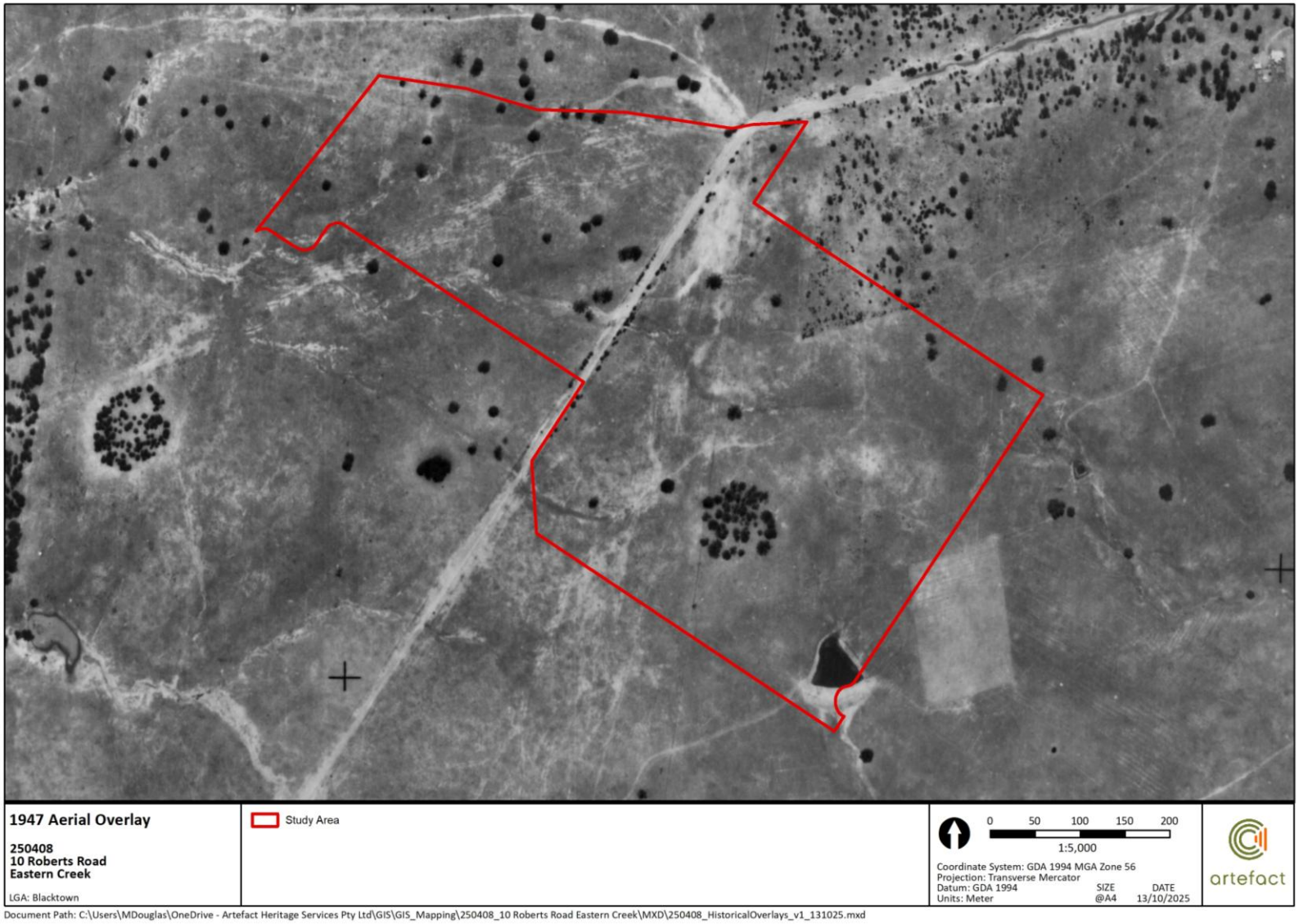


Figure 7: 1965 aerial overlay showing the construction of the Sydney West TransGrid and substation to the southern of the study area (Spatial Collaboration Portal)

Figure 8: 2004 aerial overlay showing a significant increase in quarrying, which has extended to the eastern boundary of the study area (Spatial Collaboration Portal)

Figure 9: 2005 aerial overlay showing large scale earthworks with the entire eastern portion of the study area (Spatial Collaboration Portal)

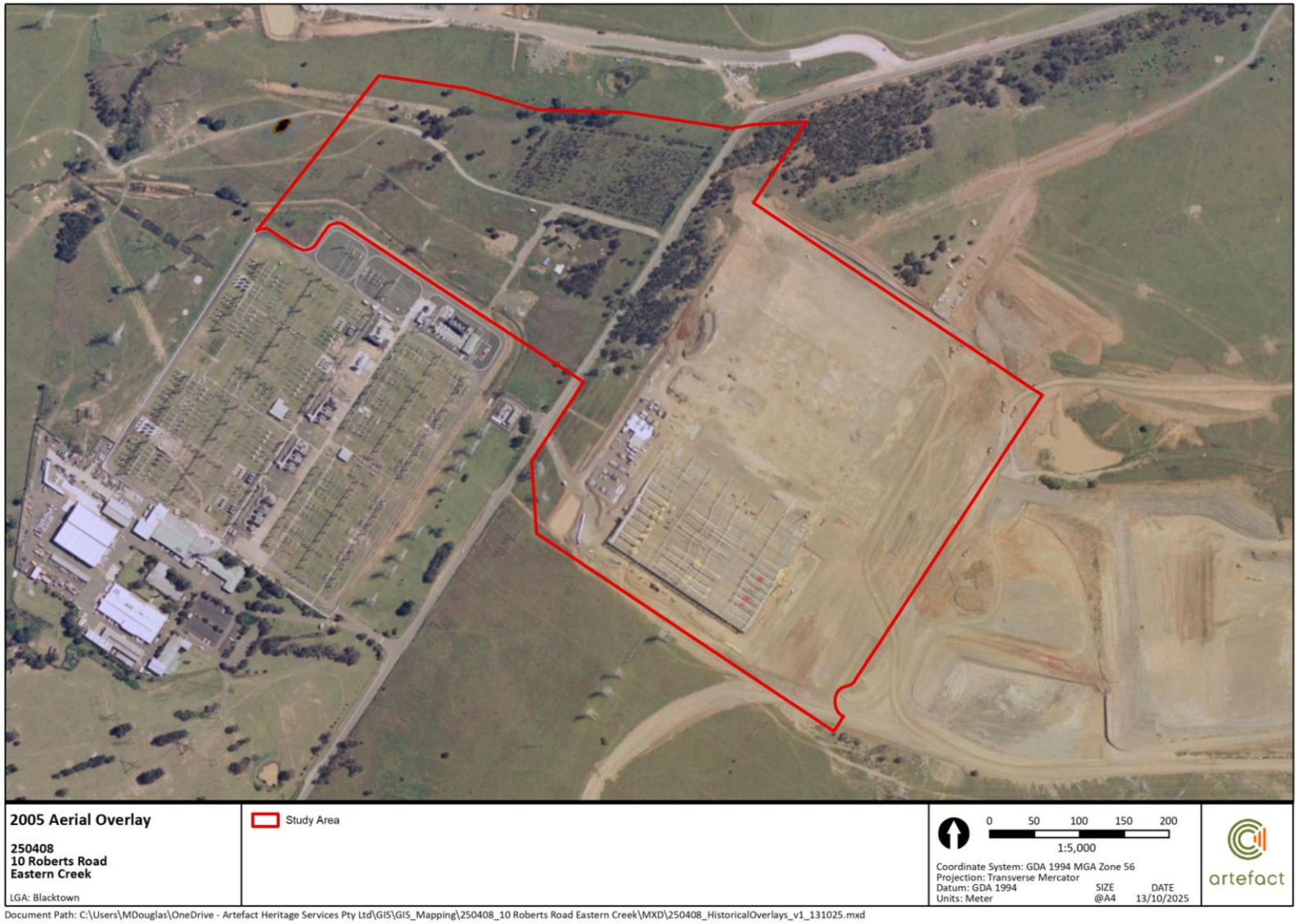
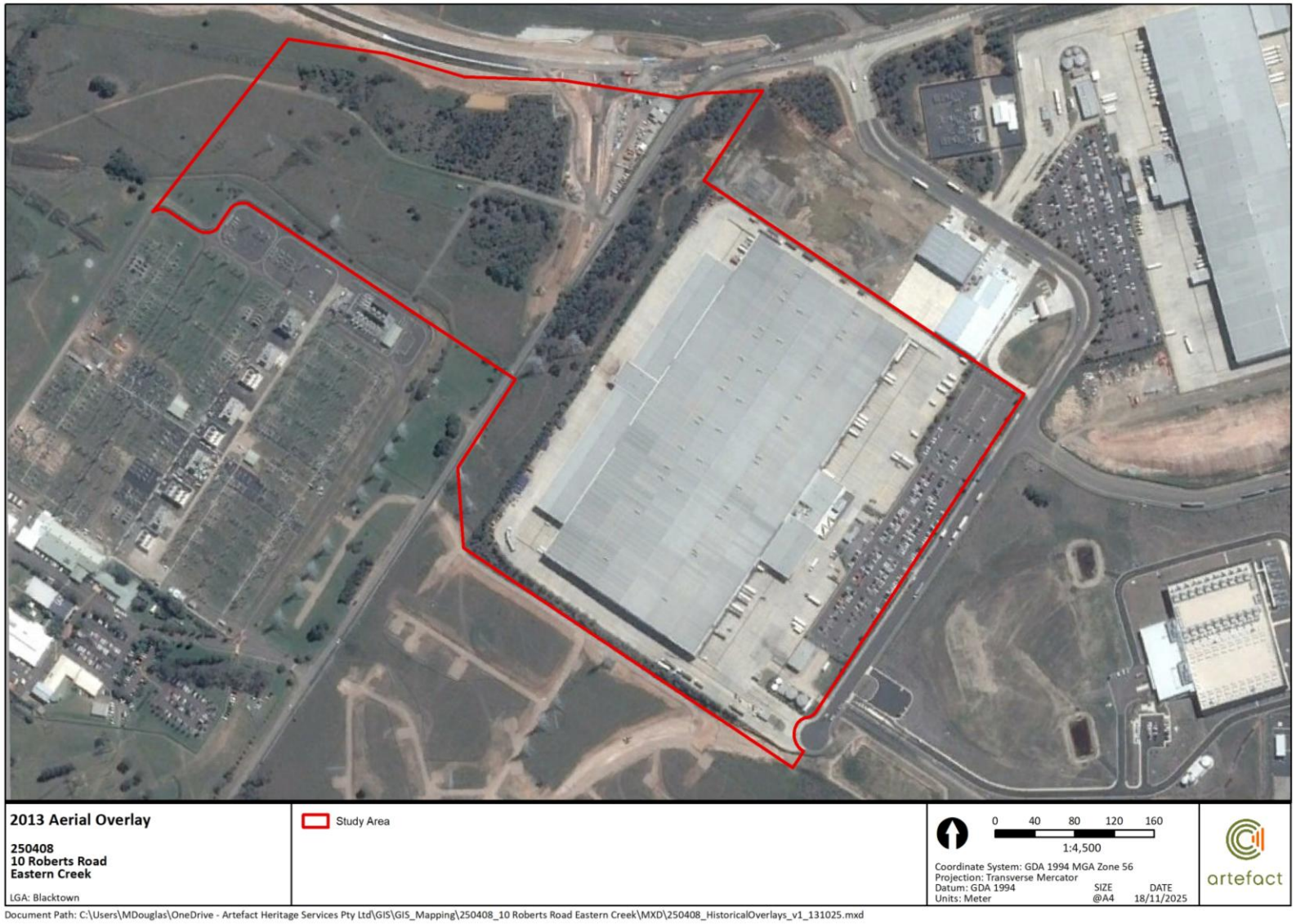


Figure 10: 2016 aerial overlay showing the road corridor development within the centre of the study area (Spatial Collaboration Portal)



3.4 Predictive model

The predictive model comprises a series of statements regarding the nature and distribution of evidence of Aboriginal land use that is expected in the study area. These statements are based on the information gathered regarding:

- Landscape context and landform units
- Ethno-historical evidence of Aboriginal land use
- Distribution of natural resources
- Results of previous archaeological work within, and in vicinity of the study area
- The Cumberland Plain predictive model, and those developed in previous investigations.

The predictive statements are as follows.

- Identification of artefact sites will be dependent on visibility, per M2A (2021). Isolated artefacts and scatters will be easier to identify in surface exposures KNC (2019)
- Areas of PAD, and artefact sites are more likely to be located in areas of relatively minimal disturbance
- Areas of nil-low archaeological potential will be associated with extensive disturbance, per Artefact (2020 and 2022b), which assessed the paved road surface of Aldington Road and the adjacent verges as being of nil to low archaeological sensitivity and the eastern portion of the study area as having no Aboriginal archaeological potential
- Higher density sites are more likely to occur in proximity to permanent water sources, typically third order tributaries or higher, per the Cumberland Plain predictive model (White & McDonald 2010). As Ropes Creek constitutes a permanent water source, higher density sites and areas of PAD are likely to be present in proximity to this water source, per EMM (2020)
- Elevated landforms, including crests, ridges and hilltops are likely to contain high densities of Aboriginal cultural material, per the Cumberland Plain Predictive model, and Total Earth Care (2007)
- Extensive vegetation clearance associated with ongoing development of the broader area is likely to have affected the survival of any mature native trees, therefore the potential for Culturally modified trees is nil-low, as indicated by an AHIMS search of the surrounding area (Figure 2)
- The potential for shelter sites, rock engravings and axe grinding grooves is limited by the landscape context and lack of exposed rock surfaces, per AHIMS Search results. Therefore, the potential for these site types is nil-low.

4.0 SUMMARY OF FIELD INVESTIGATIONS

An archaeological survey of the study area was completed on the 23 October 2025 by Lily Hackett (Senior Heritage Consultant) and Jonny Love (Senior Heritage Consultant). Kayne Moreton from the Deerubbin LALC was invited to attend the site inspection but was unable to attend. The archaeological survey was limited to accessible areas only. Densely vegetated, built up and active road corridor areas were inaccessible and therefore not surveyed.

The survey confirmed that the study area had been subject to substantial disturbance, particularly in the eastern portion, from the construction of the large industrial warehouse and associated car parking which had resulted in significant cuts into the ground surfaces. Additionally, a fence and retaining wall built with sandstone blocks and numerous subsurface services, including sewage, water, telecommunications, and electrical lines were evident, demonstrating the extensive ground and subsurface disturbance around the warehouse (Figure 11 and Figure 12). Comparatively the western portion of the study area contained an electrical substation and power lines which were surrounded by unsealed gravel roads and pathways (Figure 13 and Figure 14).

Due to extensive disturbance, extant developments or thick low-lying shrub and leaf litter, there was limited visibility across the whole study area. Typically, small areas of visibility in the eastern portion of the study area revealed imported fills used as soils for garden beds and exposed silty clay with the upper layers of soil removed likely by grading. Whereas limited visibility in the western portion of the study area revealed exposed silty clay with fragments of shale present suggesting impacts to the upper layers of soil. Overall, no exposed areas of intact, natural soils were observed during the survey, nor was it considered likely that any would exist in the study area due to the extensive nature of development and disturbance. (Figure 15 to Figure 20).

In comparison to the rest of the study area, the north section contained bushland containing tall young trees and leaf litter with limited ground disturbance although the area had been cleared as part of the development of Lenore Drive and the slip lanes in the 2010s. However, this area also contained limited visibility as surfaces were covered by leaf litter and branches. The dry silty clay surface was also present in this area suggesting the intact upper layers of soil had been removed (Figure 21 and Figure 22).

No Aboriginal objects or sites were identified during the survey, nor any areas of archaeological potential. Additionally, no mature, native vegetation was identified within the study area. The survey observed widespread disturbance to and beneath ground surfaces from previous historical development, limiting the potential the survival of below ground contexts where Aboriginal objects or sites may be present.

Figure 11: View northwest of the eastern portion of the study area showing the distribution warehouse and carpark

Figure 12: View west of the eastern portion of the study area showing the distribution warehouse and carpark

Figure 13: View northeast of the eastern portion of the study area showing the dense shrub and power lines

Figure 14: View of the eastern portion of the study area showing the exposed silty clay surface

Figure 15: View northwest of the western portion of the study area showing the electrical substation

Figure 16: View south of the western portion of the study area showing one of the unsealed gravel roads

Figure 17: View east of the western portion of the study area showing a culvert and drainage channel

Figure 18: View south of the western portion of the study area showing the footpath

Figure 19: View west of the western portion of the study area showing the power lines and shrub surface coverage

Figure 20: View south of the western portion of the study area showing the exposed soils within a drainage channel

Figure 21: View of the western portion of the study area showing the exposed silty clay surface

Figure 22: View west of the western portion of the study area showing the overgrown shrub surface coverage

5.0 CULTURAL HERITAGE VALUES

5.1 Methodology

The cultural assessment in this report includes information collected through desktop assessment and Aboriginal community consultation undertaken in accordance with the Consultation Requirements. This information was collected by Neve Penklis (Graduate Heritage Consultant, Artefact Heritage).

5.1.1 Cultural landscape

The World Heritage Convention of United Nations Educational, Scientific and Cultural Organisation (UNESCO) defines a cultural landscape as one which has 'powerful religious, artistic or cultural associations of the natural element rather than material cultural evidence, which may be insignificant or even absent' (UNESCO 1991). The relationship between Aboriginal Australians and the land is conceived in spiritual terms rather than primarily in material terms (Andrews et al 2006). Aboriginal cultural knowledge has been defined as:

> *Accumulated knowledge which encompasses spiritual relationships, relationships with the natural environment and the sustainable use of natural resources, and relationships between people, which are reflected in language, narratives, social organisation, values, beliefs and cultural laws and custom (Andrews et al 2006).*

Aboriginal cultural knowledge was traditionally bequeathed through oral traditions from generation to generation. Within all Aboriginal communities there was a time of dislocation and upheaval associated with the arrival of colonial settlers. This widespread disruption resulted in much of the detailed knowledge and understanding of many of the elements of the cultural landscape being lost from the Aboriginal community, nonetheless many Aboriginal people maintain a strong connection to the land of their ancestors and collectively possess a wealth of knowledge passed down through the generations.

5.1.2 Types of values

Aboriginal people hold significant knowledge about traditional use of land before and after contact. The landscape which encompasses the study area has cultural value of importance to the Aboriginal community. The Aboriginal community collectively holds values and knowledge that relate to:

- Traditional values: these are passed down by family and community as part of ancient tradition.
- Historical values: these are passed down by family and community and relate to the eras since colonisation; these may include information gained from historical source documents.
- Contemporary values: these are values of modern importance and relevance for Aboriginal stakeholder groups.

There is often no clear separation between these values, and they collectively co-exist with equal importance in forming the value that Aboriginal people place on landscape, cultural heritage, intangible heritage, and particular landforms or parts of the landscape.

5.2 Identified Aboriginal cultural heritage values

Table 8 provides a summary of the Aboriginal cultural heritage values associated with the local Sydney region.

Table 8: Cultural heritage values identified for the local Sydney region

Cultural heritage value	Description	Source
Aboriginal occupation	Aboriginal people have cared for the land and waters of the Eastern Creek area for tens of thousands of years.	Background research
Traditional and contemporary	The Greater Western Sydney region is known to have been a place of occupation for Aboriginal groups in the pre- and post-contact periods, but to a lesser extent. the precise identification of language groups and historical traditional lands or Country for a given area is often difficult today. However, it is widely accepted that the southwest area of the Sydney basin is Darug Country. who have valued and been custodians of Country for thousands of years.	Attenbrow 2010; 2012; Nanson et al. 1987; Williams et al. 2017
Traditional	A deep connection to and knowledge of Country has been passed down through hundreds of generations. Tradition activities associated with this region include: • Resourcing, including hunting, plant gathering and catching freshwater fish and eels, collecting various plants and food resources, and resin for glue • Ceremony – including shared hunting, dance and story telling • Firestick farming • Carved and scarred trees • Ceremonial rock and mound structures • Rock engravings and painting • Stone tool quarries and production • Burials.	Background research
Traditional and historical	• Materials such as glass and ceramics were used to make spear points and other tools • Dispossession and resistance warfare under Pemulwuy.	Background research
Traditional and contemporary	Some creation and other stories told to R. H. Mathews by Gandangarra people in 1901 were carried on for generations and survive today.	Irish & Gowen 2013

5.3 Aboriginal cultural values within the study area

The study area is widely accepted to be located within the lands of the Darug Aboriginal people who greatly valued and celebrated the abundant resources once present within and surrounding the study area. From the material evidence established through background research and previous archaeological assessments, the study area may have been culturally important, but it appears to have been a transitory rather than a place of intense occupation and activity, as areas of concentrated activity have been identified with South Creek and Eastern Creek. Additionally, it is unlikely that Aboriginal objects that may hold cultural significance will be present in the study area due to previous historical disturbance. However, the material evidence does not consider intangible

values, such as stories, ceremonies and dance, which could have taken place within the study area and have been culturally important but have left no physical remains. Therefore, both tangible and intangible values have to be considered to fully address cultural values within the study area.

No specific cultural values have currently been identified within the study area during the survey, background research or during consultation.

6.0 SIGNIFICANCE ASSESSMENT

A significance assessment of the scientific, social, historic and aesthetic values of the study area is included below.

6.1 Significance assessment criteria

An assessment of the cultural heritage significance of an item or place is required in order to form the basis of its management. The Guide (OEH 2011: 10) provides guidelines, in accordance with the Burra Charter (Australia ICOMOS 2013) for significance assessment with assessments being required to consider the following criteria:

- Social values – does the area have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons
- Historic values – is the area important to the cultural or natural history of the local area and/or region and/or state
- Scientific values - does the area have the potential to yield information that will contribute to an understanding of the cultural and natural history of the local area and/or region and/or state
- Aesthetic values – is the area important in demonstrating aesthetic characteristics in the local area and/or region and/or state.

Scientific values should be considered in light of the following criteria:

- Research potential - does the evidence suggest any potential to contribute to an understanding of the area and/or region and/or state's natural and cultural history?
- Representativeness - how much variability (outside and/or inside the subject area) exists, what is already conserved, how much connectivity is there?
- Rarity - is the subject area important in demonstrating a distinctive way of life, custom, process, land-use, function or design no longer practised? Is it in danger of being lost or of exceptional interest?
- Education potential - does the subject area contain teaching sites or sites that might have teaching potential?

It is important to note that heritage significance is a dynamic value.

6.1.1 Historic value

Historic values refer to the association of place with aspects of Aboriginal history. Historic values are not necessarily reflected in physical objects, but may be intangible and relate to memories, stories or experiences.

No specific historic values associated with the study area have been identified during the desktop assessment. The consultation process did identify that the broader area was Darug land and would have been used by Aboriginal people for fishing, hunting, camping, ceremonies, and travel. However, it was also noted through consultation that the study area is highly disturbed due to historical activity and therefore it is assessed as being unlikely that such historic values are associated with the study area.

6.1.2 Aesthetic value

Aesthetic value of a place relates to the sensory, scenic, architectural and creative aspects of a place. It may include visual aspects, such as form, scale, colour, texture and material of the fabric, and the smells and sounds associated with the place and its use.

The desktop assessment and archaeological survey of the study area concluded that the site has been subject to considerable disturbance and development which has impacted the aesthetic value of the place. This modification of the landscape would have impacted the local ecology to such an extent that it no longer resembles the original place in any sensory way. As a result, this assessment has identified no aesthetic values associated with the study area. Additionally, no aesthetic values for the study area were identified by RAPs as part of the consultation process.

6.1.3 Socio/cultural value

Social or cultural value encompasses the qualities for which a place has become a focus of spiritual, political, national or other cultural sentiment for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them. Places of social or cultural value have associations with contemporary community identity. These places can have associations with tragic or warmly remembered experiences, periods, or events. Communities can experience a sense of loss should a place of social or cultural value be damaged or destroyed. Social or cultural values can therefore only be identified through consultation with Aboriginal people.

No specific socio/cultural values have been identified within the study area as a result of the background research and consultation to date.

6.1.4 Scientific value

Scientific values refer to a site's potential to contribute information to our current understanding. No Aboriginal objects or areas of Aboriginal archaeological potential were associated with the study area. Therefore, the study area possessed no scientific value or archaeological significance.

6.2 Statement of significance

No specific historical, aesthetic and social/cultural significance for the study area has been identified to date. The study area has also been shown to not possess any Aboriginal objects or Aboriginal archaeological potential as it has been significantly disturbed by historical land use. As such, it has no scientific significance.

7.0 IMPACT ASSESSMENT

7.1 Proposed works

A State Significant Development Application (SSDA) has been prepared to support a data centre at 10 Roberts Road, Eastern Creek and associated offsite enabling infrastructure.

The proposal will include:

- Site preparation works including demolition, bulk excavation and removal of existing structures on the site, tree and vegetation clearing and bulk earthworks.
- Construction, fit-out and 24/7 operation of a Data Centre
- Offsite enabling infrastructure
- 2 Data Centre Buildings
  - Building 1 – 2 Level + rooftop plant
  - Building 2 – 3 Level + rooftop plant
- Ancillary office, EOT and amenity
- Provision of required utilities including:
  - diesel storage tanks
  - water tanks
  - substations on site
- Vehicle access for 20 m articulated vehicles (semi-trailers)
- Associated landscaping and site servicing
- Installation of site services and drainage infrastructure.

7.2 Aboriginal heritage impact

This report has determined that there are no Aboriginal objects within the study area, nor is there the potential for Aboriginal objects to be present due to the historical disturbance that has occurred within the study area. As such, the proposed works would have no impact to Aboriginal heritage.

7.3 Ecological Sustainable Development principles

The Guide (OEH 2011) specifies that Ecological Sustainable Development (ESD) principles must be considered when assessing harm and recommending mitigation measures in relation to Aboriginal objects.

The following relevant ESD principles are outlined in Section 3A of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*:

- Decision-making processes should effectively integrate both long term and short term economic, environmental, social and equitable considerations (the ‘integration principle’)
- If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation (the ‘precautionary principle’)

- The present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations (the 'principle of intergenerational equity').

7.3.1 The integration principle

Decision making processes should effectively integrate both long term and short term economic, environmental, social and equitable considerations (the 'integration principle'). The preparation of this ACHAR demonstrates regard for the integration principle by considering Aboriginal heritage values and impacts to these from the proposal during the planning phase. The nature of the proposal is in itself one that contributes to the long term economic and social needs of current and future residents of the area.

7.3.2 The precautionary principle

If there are threats of serious or irreversible environmental damage, lack of full scientific confidence should not be used as a reason for postponing measures to prevent environmental degradation (the 'precautionary principle'). This ACHAR has assessed that Aboriginal objects are unlikely to be present based on significant historical disturbance within the study area. This ACHAR has been prepared to the Code of Practice therefore has met the industry standards for scientific confidence and has determined that there are no Aboriginal sites or potential for Aboriginal objects within the study area.

7.3.3 The principle of intergenerational equity

The proposed works would adhere, as close as possible, to the principle of intergenerational equity by collating scientific and cultural information on former Aboriginal occupation of the study area through the previous investigations and this ACHAR. The ATR prepared an assessment of the study area and synthesised the regional character of Aboriginal objects and sites for posterity and future generations.

7.4 Cumulative impacts

A cumulative impact is an impact on Aboriginal cultural heritage resulting from the incremental impact of the action/s of a development when added to other past, present, and reasonably foreseeable future actions. As the proposed works will not impact Aboriginal cultural heritage, there will not be any cumulative impacts.

8.0 MANAGEMENT AND MITIGATION MEASURES

8.1 Guiding principles

The overall guiding principle for cultural heritage management is that where possible Aboriginal sites should be conserved.

Where unavoidable impacts occur then measures to mitigate and manage impacts are proposed. Mitigation measures primarily concern preserving the heritage values of sites beyond the physical existence of the site. The most common methods involve detailed recording of Aboriginal objects, archaeological test and salvage excavations, artefact analysis and, where appropriate, reburial of Aboriginal objects in a location determined by the RAPs.

Mitigation measures vary depending on the assessment of archaeological significance of a particular Aboriginal site and are based on its research potential, rarity, representatives and educational value. In general, the significance of a site would influence the choice of preferred conservation outcomes and appropriate mitigation measures, usually on the following basis:

- Low archaeological significance – conservation where possible. SSD Conditions of Approval would be required to impact the site before work can commence
- Moderate archaeological significance – conservation where possible. If conservation was not practicable, further archaeological investigation would be required such as salvage excavations or surface collection in accordance with the SSD Conditions of Approval.
- High archaeological significance – conservation as a priority. Where all other practical alternatives have been discounted mitigation measured such as comprehensive salvage excavations in accordance with the SSD Conditions of Approval would be required.

This report has determined that Aboriginal objects are unlikely to be present within the study area. As such, no mitigation measures are proposed. Any unexpected Aboriginal objects encountered during the development would be managed under an Unexpected Finds Procedure (UFP).

8.2 Management measures

As no Aboriginal objects or areas of archaeological potential have been identified within the study area, it is unlikely that Aboriginal objects are at risk of being harmed. Therefore, no mitigation measures are proposed.

Unexpected finds must be managed through an Unexpected Finds Procedure (UFP). An UFP would outline the protocols necessary in the event that any unexpected Aboriginal objects, sites or archaeological deposits are identified during the works. This policy should be presented to project personnel as part of site inductions for the project.

8.3 Changes to the project area

Advice provided within this ACHAR is based upon the most recent information provided by the proponent at the time of writing. Any changes made to the project should be assessed by an archaeologist in consultation with the RAPs. Any changes that may impact on Aboriginal sites not assessed as part of the project may warrant further investigation and result in changes to the recommended management and mitigation measures.

9.0 CONCLUSION

9.1 Summary of findings

The ACHAR has made the following conclusions through a combination of desktop assessment, archaeological survey and community consultation:

- The background research identified no registered AHIMS sites were located within the study area
- The study area has been subject to varying levels of disturbance which include, vegetation clearing, road construction, quarrying, large scale earthworks, construction of a large warehouse and substations
- The study area is not within an area of high Aboriginal archaeological potential as outlined in the Blacktown Development Control Plan 2015
- No Aboriginal objects or areas of potential for Aboriginal objects were identified during the archaeological survey and background research
- While the broader landscape around the Greater Western Sydney region possesses Aboriginal cultural heritage values, no specific cultural values have been identified in association with the study area
- While the development proposal would result in ground disturbance throughout the study area, there is no evidence that the works would cause harm to Aboriginal sites.

9.2 Recommendations

Based on the findings, the following recommendations and mitigation measures are made:

- No further assessment or mitigation measures are necessary due to the absence of Aboriginal objects, sites and cultural heritage values for the study area, and the lack of potential for Aboriginal objects to be present
- Ongoing consultation with the RAPs would continue throughout the life of the project, if necessary. For example, ongoing consultation with RAPs would take place in the event of any unexpected Aboriginal objects being identified during the proposal
- A heritage induction including an Unexpected Finds Procedure should be prepared and all workers should be inducted prior to the commencement of works
- This ACHAR must be submitted as part of the EIS to fulfil the requirements of the project SEARs
- Where there are changes to the project area or development proposal, additional archaeological assessment may be required
- A copy of this report should be sent to the Deerubbin LALC.

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APPENDIX A – ARCHAEOLOGICAL TECHNICAL REPORT

Redacted from public view.

APPENDIX B – CONSULTATION LOG AND RECORDS

Redacted from public view.

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