

10 April 2026

Our ref: 26SYD12537

Lot 208, Lot 209, Lot 210 Automated Distribution Centre (SSD-10549958) – Historical Heritage Assessment Addendum

This Historical Heritage Assessment (HHA) addendum report has been prepared by Eco Logical Australia (ELA) to accompany a detailed State Significant Development Application (SSDA) for the construction of a warehouse or distribution facility (as defined), referred to throughout this report as an automated distribution facility (ADC).

The land to which this report relates is referred to as 475 Badgerys Creek Road, Bradfield, which has direct interface with the Western Sydney International Airport (WSI), legally described as part Lot 102 and Lot 105 in DP 1316278. It is noted that the ADC will be located on future lots within the 475 Badgerys Creek Road landholding. For the purpose of this Report, reference to ‘the site’ will relate primarily to the area within the broader lot proposed to be developed for the ADC, unless otherwise specified.

This report has been prepared to address the Secretary’s Environmental Assessment Requirements (SEARs) issued for the project (SSD-10549958).

This report has been prepared to accompany a SSDA for the construction of a warehouse or distribution facility (as defined) by an e-retailer at 475 Badgerys Creek Road, Bradfield (the site).

This report has been prepared in response to the requirements contained within the Secretary’s Environmental Assessment Requirements (SEARs) dated 2 March 2026. Specifically, this report has been prepared to respond to the SEARs requirement identified in Table 1.

Table 1: SEARs (SSD-10549958)

Item	Description of requirement	Section reference
Non-Aboriginal cultural heritage	Consideration of any non-Aboriginal cultural heritage (including both cultural and archaeological significance) which must detail potential impacts on heritage assets, if any, and any proposed management and mitigation measures.	Sections 1-7 of HHA (ELA, 2024) (Appendix B)

In addition to the requirements outlined in Table 1, Heritage NSW provided the following advice on 4 February 2026 (Appendix A) in relation to the project SEARs (SSD-10549958):

Table 2: Agency Advice for SEARs Input

Agency	Input to SEARs	Section reference
Heritage NSW	Identify all heritage items within the site and its vicinity including built heritage, landscapes and archaeology, map these items, and assess why the items and site(s) are of heritage significance	Section 5 of HHA (ELA, 2024) (Appendix B); Section 1.3 of this HHA Addendum report (ELA, 2026).

Agency	Input to SEARs	Section reference
	Assess the impacts of the proposal on any identified heritage items in accordance with the Guidelines for Preparing Statements of Heritage Impact. Discuss the attempts to avoid and/or mitigate the impact on the heritage significance of the site and the surrounding heritage items including any options analysis.	Section 5 and Section 7 of HHA (ELA, 2024) (Appendix B)
	Assess the impacts of the proposal on any heritage item(s) within the view catchment of the proposal.	Section 5 of HHA (ELA, 2024) (Appendix B); Section 1.3 of this HHA Addendum (ELA, 2026).
	If impacts on potential historical archaeology are identified, an historical archaeological assessment should be prepared by a suitably qualified archaeologist in accordance with the guidelines Archaeological Assessment and Assessing significance for Historical Archaeological sites and Relics.	Section 4 of HHA (ELA, 2024) (Appendix B)

This addendum report has been prepared as per Heritage NSW’s advice.

1.1. Site description

The land to which this report relates is referred to as 475 Badgerys Creek Road, Bradfield, which has direct interface with the Western Sydney International Airport (WSI). It is noted that the ADC will be located on proposed Lots 208, 209 and 210 within the broader 475 Badgerys Creek Road, Bradfield landholding. These lots are not yet formally registered.

The broader landholding has an area of approximately 184 hectares and is subject to an approved Master Plan prepared by Inghams Property Group (IPG). The proposed ADC will be located in Stage 2 of the IPG master plan site. The application site has an area of approximately 172,000m2. The location of the application site is shown in Figure 1.



Figure 1: Location of the proposed ADC (Urbis 2025)

The broader master plan site was formerly used for intensive poultry farming and previously contained a series of sheds and ancillary structures and associated internal road network, which have now been demolished. Earthworks and other site establishment works have commenced across the broader IPG master plan site.

1.2. Project description

It is the e-retailers intent to construct and operate a new ADC. The ADC will be a distribution centre for goods storage and distribution direct to offsite third-party sortation service providers.

The proposed description of development is as follows:

“Construction, fit-out and operation of a warehouse or distribution facility (automated distribution centre) with associated car parking, landscaping, driveway accesses, utility service connection, minor earthworks and other related works”.

Bulk earthworks will be undertaken by IPG via a separate pathway to establish the development pad for the site as well as the levels for the adjoining masterplan roads and development lots. However, additional bulk earthworks are proposed as part of the SSDA to ensure that the proposed warehouse is appropriately integrated within its surroundings.

1.3. Database Searches

To identify if any additional heritage items have been gazetted since the HHA (ELA, 2024) was authored, the following databases were searched:

- Australian Heritage Database (searched on 12 March 2026)
- State Heritage Inventory (searched on 12 March 2026).

No changes were identified from the HHA (ELA, 2024).

There are no heritage items located within 1 kilometre of the study area (Figure 2). There are two items located within 2 kilometres of the ADC sites which were summarised in Section 5.1. of the Masterplan HHA (ELA, 2024) and are also summarised below:

- ‘Mount Pleasant Homestead’ (State Environmental Planning Policy [Precincts – Western Parkland City] 2021 Item No. I4) is located 1.4 kilometres south-east from the subject site.
- ‘Kelvin’ (State Heritage Register Listing No. 00046/State Environmental Planning Policy [Precincts – Western Parkland City] 2021 Item No. I3) is located 1.7 kilometres south from the subject site as shown in Figure 2.

Due to the distance of these heritage items (>1 kilometre), development within the study area would not directly (physically) impact their significant heritage values, and is unlikely to impact them indirectly (visually). The Statements of Significance for each item listed in in Appendix A of the HHA (ELA, 2024) (Appendix B).

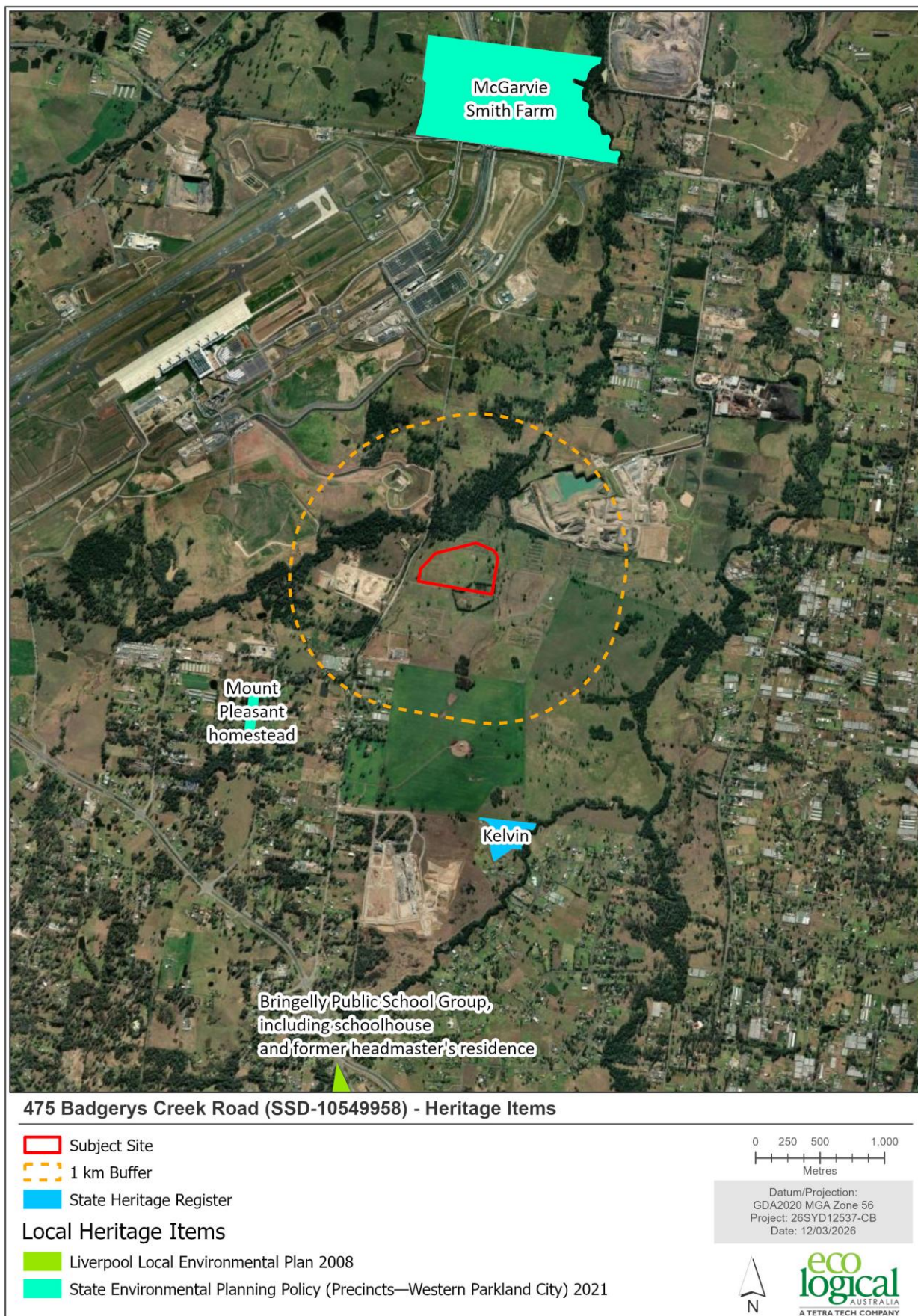


Figure 2: Heritage items in the vicinity of the subject site

1.4. Conclusion

The *475 Badgerys Creek Road, Bradfield NSW Historical Heritage Assessment* (ELA 2024) was prepared to support the Masterplan for 475 Badgerys Creek Road, Bradfield, NSW for IPG in collaboration with the Department of Planning, Housing and Infrastructure (DPHI). The Masterplan has since been approved (WSA-MP01). The Masterplan includes the proposed ADC subject site. It is noted that the ADC will be located on future lots within the 475 Badgerys Creek Road landholding. The proposed works will have no impact on heritage items.

475 Badgerys Creek Road, Bradfield NSW Historical Heritage Assessment (ELA 2024), in conjunction with this addendum report, suitably addresses the SEARs for the SSDA (SSD-105499958). The *475 Badgerys Creek Road, Bradfield NSW Historical Heritage Assessment* HHA (ELA 2024) is provided in Appendix B of this report and contains sufficient assessment of the proposed ADC location, situated within the Masterplan footprint. Updated database searches have been undertaken following the finalisation of Masterplan HHA (see Section 1.3 of this report). No changes to the findings or recommendations of the Masterplan HHA are warranted based on the updated searches or continued consultation.

The recommendations provided in Section 7 of the HHA (ELA, 2024) (Appendix B) are suitable for the works undertaken under SSD-105499958. The recommendations are summarised below:

Recommendation 1 - Unexpected finds procedure

An ‘unexpected heritage find’ can be defined as any unanticipated archaeological discovery, that has not been previously assessed or is not covered by an existing approval under the *Heritage Act 1977* (Heritage Act) or *National Parks and Wildlife Act 1974* (NPW Act). These discoveries are categorised as either:

- Aboriginal objects (archaeological remains i.e.: stone tools),
- Historic (non-Aboriginal) heritage items (archaeological remains (i.e., artefacts) or movable objects),
- Human skeletal remains.

Should any unexpected historical archaeology be uncovered during any future excavation works, the following procedure must be adhered to:

- Stop all work in the immediate area of the item and notify the Project Manager.
- Establish a ‘no-go zone’ around the item. Use high visibility fencing, where practical. Inform all site personnel about the no-go zone.
- No work is to be undertaken within this zone until further investigations are completed.
- Engage a suitably qualified and experienced Archaeologist to assess the finds.
- If the item is assessed as not a ‘relic’, a ‘heritage item’ or an ‘Aboriginal object’ by the Archaeologist, work can proceed with advice provided in writing.
- The Heritage Council must be notified if the finds are of local or state significance. Additional approvals will be required from Heritage NSW and additional recording or salvage before works can recommence on site.

I, Charlotte Bradshaw, confirm this Historical Heritage Assessment Addendum Report, in conjunction with the *475 Badgerys Creek Road, Bradfield, NSW Historical Heritage Report* (ELA, 2024), addresses the requirement of SEARs for Non-Aboriginal cultural heritage and relevant State and local legislation, policies, and guidelines including *Assessing Heritage Significance* guidelines (DCCEEW, 2025). I further

confirm that none of the information contained in this Historical heritage Assessment Addendum Report is false or misleading.

Regards,



Charlotte Bradshaw
Senior Heritage Consultant

Appendix A – Heritage NSW SEARs Advice

Attached on the following page.

Rebecka Williams
Department of Planning, Housing and Infrastructure
rebecka.williams@dpie.nsw.gov.au

Letter uploaded to the Major Projects Planning Portal

Input to SEARs – State Significant Development

Proposal: WSI3 Automated Distribution Centre

Major Project reference: SSD-105499958

Received: 4 February 2026

Dear Rebecka,

Thank you for your referral seeking input from the Heritage Council of NSW to the Secretary's Environmental Assessment Requirements for the above State Significant Development (SSD) proposal.

The proposed SSD site is in the vicinity of State Heritage Register item Kelvin (SHR no. 00046).

In preparing this advice Heritage NSW has reviewed the provided scoping report. Heritage NSW recommends that the following Secretary's Environmental Assessment Requirements be included:

1. A suitably qualified heritage consultant is to:
 - a. Identify all heritage items within the site and its vicinity including built heritage, landscapes and archaeology, map these items, and assess why the items and site(s) are of heritage significance;
 - b. Assess the impacts of the proposal on any identified heritage items in accordance with the Guidelines for Preparing Statements of Heritage Impact. Discuss the attempts to avoid and/or mitigate the impact on the heritage significance of the site and the surrounding heritage items including any options analysis.
 - c. Assess the visual impacts of the proposal on any heritage item(s) within the view catchment of the proposal.

2. If impacts on potential historical archaeology are identified, an historical archaeological assessment should be prepared by a suitably qualified archaeologist in accordance with the guidelines Archaeological Assessment and Assessing Significance for Historical Archaeological Sites and Relics.

If you have any questions about this correspondence, please contact Alison Lamond, at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

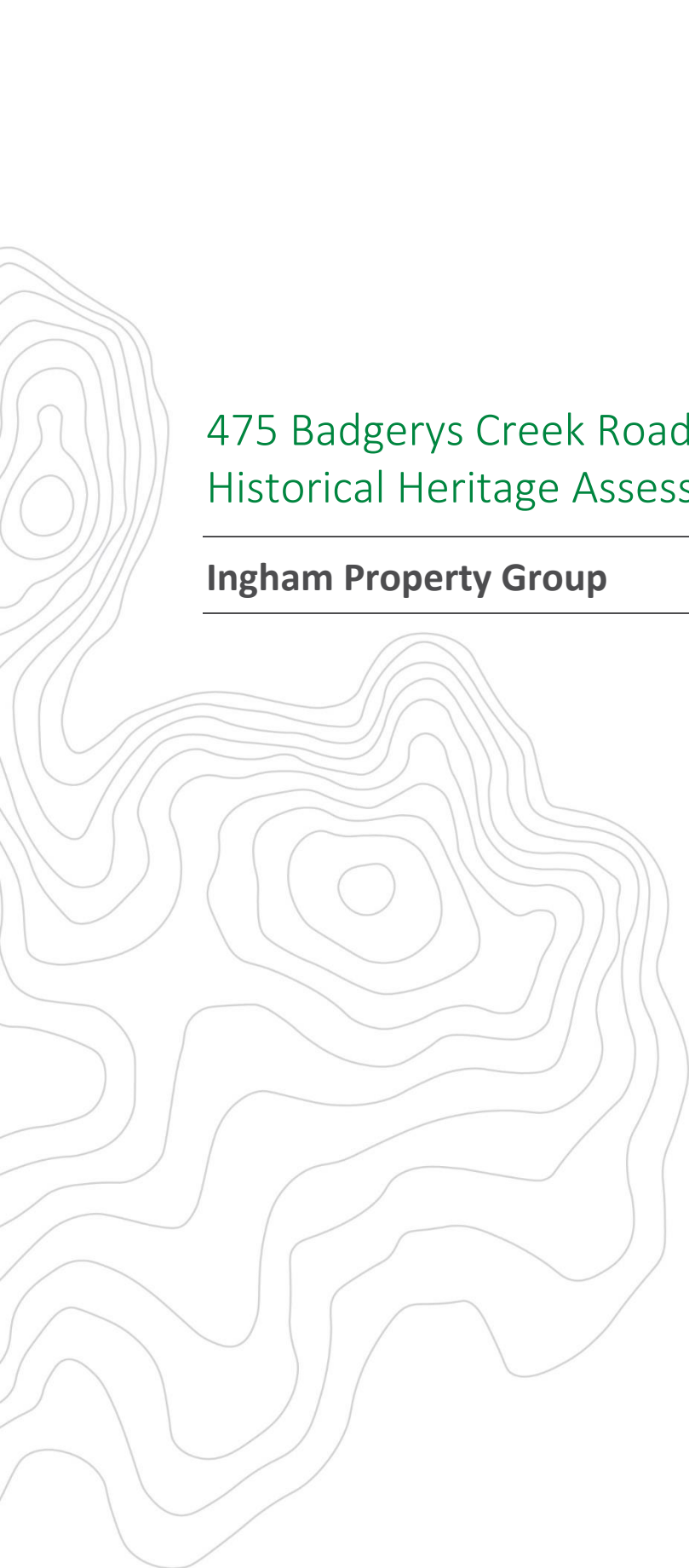
Yours sincerely,

Alison Lamond

Alison Lamond
Manager
Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate of the Heritage Council of NSW
16 February 2026

Appendix B – 475 Badgerys Creek Road, Bradfield Historical Heritage Assessment (ELA, 2024)

Attached on the following page.

A stylized topographic map with green contour lines is positioned on the left side of the page, extending from the top left towards the bottom left.

475 Badgerys Creek Road, Bradfield Historical Heritage Assessment

Ingham Property Group

DOCUMENT TRACKING

Project Name	475 Badgerys Creek Road, Bradfield - Historical Heritage Assessment
Project Number	23SYD 5455
Project Manager	Karyn McLeod
Prepared by	Jessica Horton
Reviewed by	Karyn McLeod
Approved by	David Bonjer
Status	Final
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Last saved on	7 February 2025

This report should be cited as 'Eco Logical Australia 2024. 475 Badgerys Creek Road, Bradfield - Historical Heritage Assessment. Prepared for Ingham Property.'

ACKNOWLEDGEMENTS

This document has been prepared by Eco Logical Australia Pty Ltd with support from Michael Parkinson, Ingham Property.

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Template 2.8.1

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Abbreviations

Abbreviation	Description
AHD	Australian Heritage Database
CHL	Commonwealth Heritage List
CMP	Conservation Management Plan
DCP	Development Control Plan
DPE	Department of Planning & Environment
ELA	Ecological Australia Pty Ltd
HHA	Historical Heritage Assessment
LEP	Local Environment Plan
LGA	Local Government Area
LPI	Land and Property Information
SHI	State Heritage Inventory
SEPP	State Environmental Planning Policy
SEPP [WSA] 2020	State Environmental Planning Policy (Western Sydney Aerotropolis) 2020
SHR	State Heritage Register

1. Introduction

1.1. Background

Eco logical Australia (ELA) has been commissioned by Ingham Property to prepare a Historical Heritage Assessment (HHA) to support a Master Plan Application to the Department of Planning and Environment for 475 Badgerys Creek Road, Bradfield NSW (the study area; Figure 1). The assessment will outline any historic heritage constraints in regard to potential future development of the study area.

The study area is not a listed heritage item, nor is it located within a conservation area. The closest heritage items are located within 1 kilometre and listed on the State Heritage Register and Schedule 2 of the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 (SEPP [WSA] 2020) and will not be impacted by proposed development within the study area (Figure 15).

This report will provide a historical context of the study area, review of listings, legislative requirements, and previous heritage studies. Mapping and the archaeological potential and significance of the site will be included. Where necessary, mitigative measures and recommendations for the long-term conservation of heritage values will be provided.

1.2. Study area location

The study area is located at 475 Badgerys Creek Road, Bradfield NSW (Lots 99 and 100 in DP1287207). It is located within the Local Government Area (LGA) of Liverpool, Parish of Claremont, and County of Cumberland. The study area comprises a total area of 184 ha along Badgerys Creek Road, centrally located within Western Parkland City, approximately 55 kilometres west of Sydney CBD and 30 kilometres south of Penrith. It is surrounded by agricultural land, with Longleys Road and PGH Brickworks to the north, the Northern Road to the south, South Creek to the east and Badgerys Creek to the west. Lot 99 comprises the zone substation and Lot 100 comprises the remainder of the site.

1.3. Proposal

The subject land comprises a total area of 184 ha along Badgerys Creek Road, strategically located within the heart of the Western Parkland City. The majority of the site is under the ownership of IPG, with a small portion of land earmarked for the North Bradfield Zone Substation owned by Endeavour Energy. The site is largely grass land and is largely clear of vegetation as it is currently used for agricultural purposes. There is an internal road network within the site which had previously connected the now demolished sheds and ancillary structures dispersed across the site.

The subject land is situated within the Western Sydney Aerotropolis, with a direct interface with the Western Sydney International Airport (WSI). It is bound by two significant riparian corridors which define Western Sydney, with South Creek to the east and Badgerys Creek to the north-west. The immediate surroundings of the site are characterised by large rural landholdings used predominately for agricultural and light manufacturing purposes, all of which will be redeveloped in accordance with the Aerotropolis Precinct Plan vision.

The IPG Master Plan was informed by a detailed assessment of the site-specific considerations through preliminary site investigations. The Master Plan breaks down the general application of the Enterprise zone across the site and provides a more granular approach to land use planning with considerations

made to the opportunities and constraints of the site. The structure plan is made up of four key land uses which include enterprise and light industry, business and enterprise, and employment zone centres.

1.4. Methodology

This Heritage Assessment has been prepared in accordance with the NSW Heritage Manual *Statements of Heritage Impact* (2002) and *Assessing Heritage Significance* (2001) guidelines. The philosophy and process adopted is that guided by the *Australia ICOMOS Burra Charter* 1999. The State Environmental Planning Policy (western Sydney Aerotropolis) 2020, Liverpool Local Environmental Plan 2008 and the Liverpool Development Control Plan 2008 have been considered in this assessment.

1.5. Author identification

This report has been prepared by ELA Senior Heritage Consultant, Jessica Horton (BA [Archaeology & History] and MA [Heritage Conservation], University of Sydney), with input and review by Karyn McLeod, ELA Principal Heritage Consultant, (BA Hons [Archaeology] University of Sydney, MA [Cultural Heritage] Deakin University).

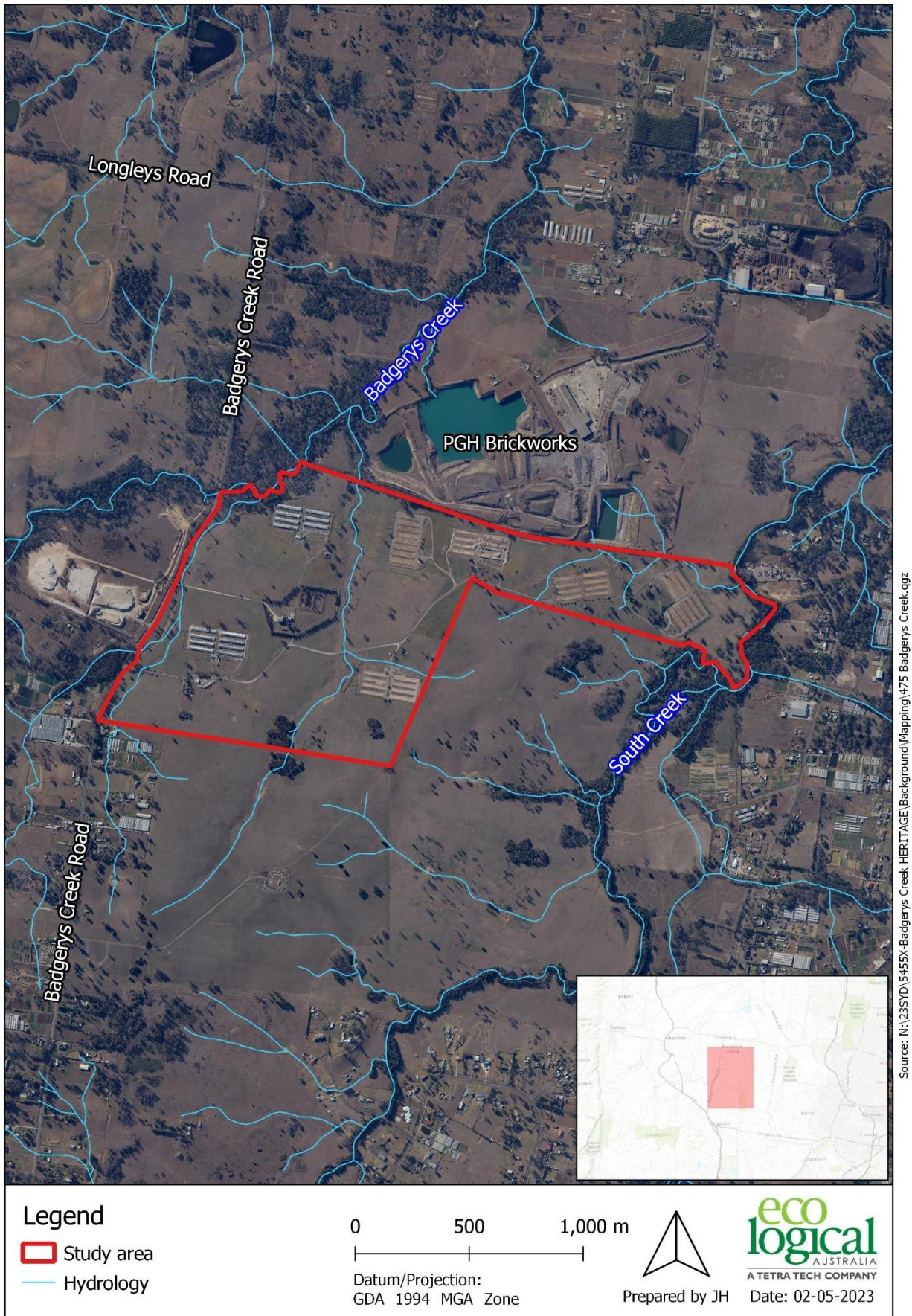
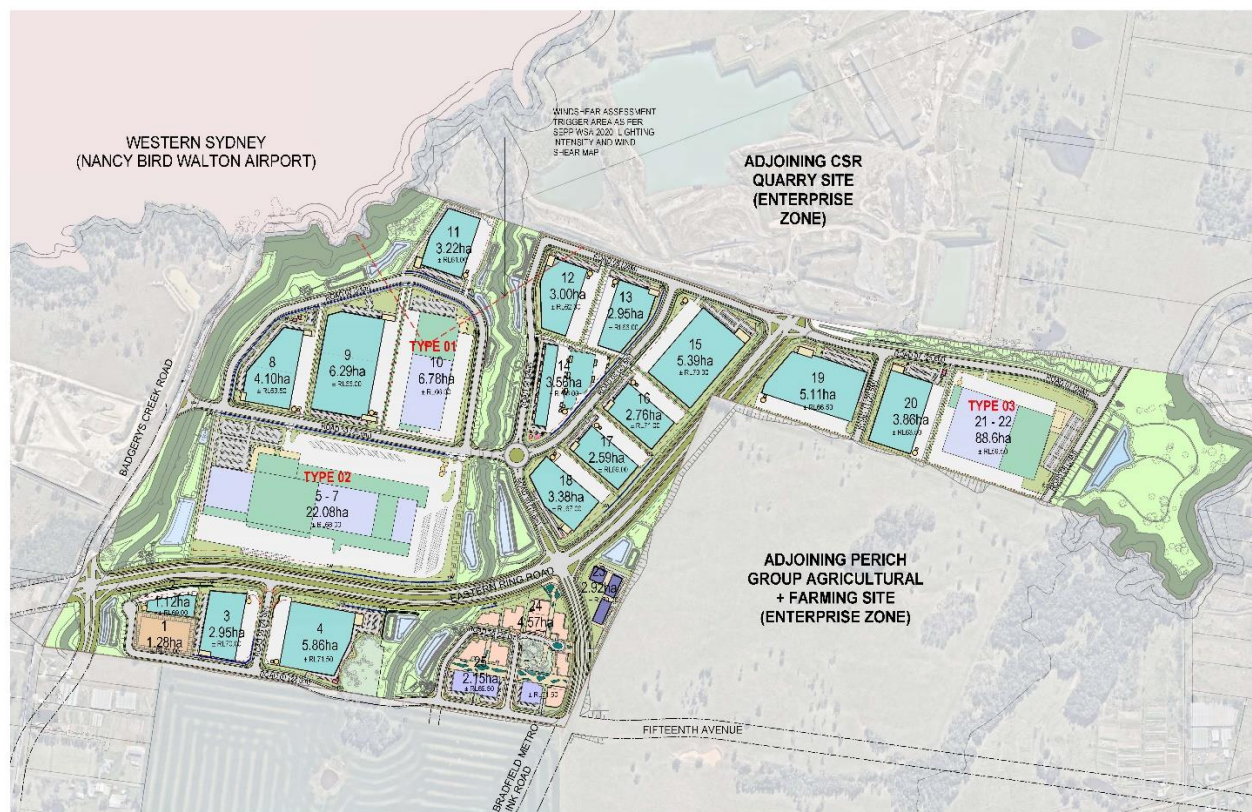


Figure 1: Location of the study area (Sixmaps imagery, 2018)


Legend

WAREHOUSE, 14M	COMMERCIAL / RETAIL	LOCAL PARK	AMENITIES	BUSINESS PARK	FIRE SERVICES	FIRE TRAIL	STORAGE BASIN	RW	RETAINING WALL	HIGH BAY COMPONENT HEIGHT EXCEEDING 35M BUT BELOW 52.5M
ANCILLARY OFFICE	BUSINESS/ ENTERPRISE USE	SUBSTATION	RIPARIAN CORRIDORS	FUTURE CULTURE-DE-SAC	HARDSTAND	FOOTPATHS	SW	SWALE	EXISTING TREES	WAREHOUSE HEIGHT BELOW 35M



Figure 2: 475 Badgerys Creek Road structure plan (Site Image 2025)

2. Site history

2.1. Traditional ownership

Aboriginal people have continuously occupied Australia for at least 65,000 years (Clarkson et al 2017), utilising the land and available resources. Dates of the earliest occupation of the continent by Aboriginal people are subject to continued revision as more research is undertaken. The earliest undisputed radiocarbon date from the Sydney region comes from a rock shelter site north of Penrith, Shaw's Creek, dated to around 14,700 BP (Attenbrow 2010). Alternate artefactual evidence found on the Nepean River suggests Aboriginal people have occupied the Sydney region for at least 40,000 years (Stockton & Holland 1974).

Badgerys Creek lies within a transitional area between the tribal boundaries of the Dharug, Dharawal and Gundungurra language groups (Attenbrow 2010). The precise geographical boundaries between these three groups cannot be clearly defined due to the limitations of historical records (Kohen and Lampert 1987), however the study area (present-day Penrith and Liverpool LGAs) is now generally considered to have been occupied by Darug-speaking clans (Attenbrow 2010). Anthropologist R.H. Matthews writes:

"The Dharukk speaking people adjoined the Thurrawal on the north, extending along the coast to the Hawkesbury River, and inland to what are now Windsor, Penrith, Campbelltown, and intervening towns." (Matthew, 1901d: 55 in Attenbrow 2010: 32)

The Darug people were semi-nomadic hunter gatherers who utilised available resources, including the various animals and plants in the region. Aboriginal people hunted wallabies, kangaroos, possums, flying foxes, birds, and fish and collected wild honey and yams, which also served as important food sources. Family groups belonged to clans who were united by languages and cultural affinities and had ties to specific areas of land.

Aboriginal people used a wide variety of natural materials for medicinal purposes, social conventions, the manufacture of tools and ceremonial events. These materials were usually sourced locally but rarer items were also traded between groups, items that may have included tools made from organic materials such as paddles and spears, tools made from stone such as hammerstones, personal decorative items and shelters (Boot 2002).

The arrival of European settlers severely impacted the lives of the local Aboriginal populations as it led to a smallpox epidemic which spread to neighbouring regions and killed over half of the Aboriginal population in the Sydney Basin region (Organ, 1990) and led to significant social restructuring. In the Cumberland Plains region, European graziers slowly took over the traditional Aboriginal land, creating a competition for resources, widespread social disruption to traditional ways of life and ultimately led to a disconnection of local Aboriginal people from their traditional lands. Some Aboriginal people remained and continued to live a semi-traditional life on the peripheries of European settlements until at least the mid-1800s, despite the impacts to their traditional ways of being (Attenbrow 2010).

2.2. Development of Badgerys Creek

European exploration into Badgerys Creek occurred as early as 1803, when George Caley led an expedition through the Mulgoa Valley. Formal surveys of Castlereagh Road and the surrounding area were commissioned in 1803, whilst surveys of the Mulgoa Valley occurred from 1809 (AMBS 2014, 17).

At point of European settlement, the Cumberland Plain was densely forested and comprised highly clayey soil, suitable for stock-grazing and wheat growing (AMBS 2014, 17). To ensure the betterment of the colony, large parcels of land, were granted to settlers to establish substantial rural estates, supported by convict labour. Substantial grants within Bringelly and Badgerys Creek initially went to James Badgery, Robert Lowe, and John Blaxland, with smaller grants made to Edward Powell, Thomas Pitt, and Sarah Howe (AMBS 2014, 17).

Subdivision of the large estates occurred during the mid-nineteenth century, ultimately changing the pattern of land settlement within Badgerys Creek. The original estates were reduced to small farming lots, interspersed with roadways on a grid system (AMBS 2014, 23). Notable subdivisions were the Luddenham and Regentville subdivisions, representing over 10,000 acres, offered for sale from 1859. James Badgery's estate (Exeter Farm) was subdivided and sold during the 1880s. Public services including a Methodist School, post office, Uniting Church and Commonwealth Bank were established at Luddenham by 1914. Whilst a butcher's shop, public school, post office, Badgerys Creek Uniting (Methodist) Church and St John's Anglican Church had been constructed by the early 1900s (AMBS 2014, 26-27).

Further settlement at Badgerys Creek occurred from the 1920s as additional portions of the Exeter Estate were provided under the *Solider Settlement Act 1919*. During the 1950s, Government-funded research stations were established within Badgerys Creek, and an Overseas Telecommunications Commission station and Royal Australian Air Force Radio Receiving Station were constructed in the area (AMBS 2014, 28). Badgerys Creek has retained its rural character from the 1960s, with dairy and poultry farming, bee keeping, horse and dog training, and market gardening as the main local industries (AMBS 2014, 28).

Propositions for the development of an airport at Badgerys Creek occurred from 1985, with the proposed airport site approved in 2014. Construction began in 2018, with an estimated completion date of 2026.

2.3. The study area

The study area straddles original land grants made to Matthew Robinson ('St Aubyns Estate,' 500 acres), Gustavus A. Low ('Low Brook Estate,' 100 acres), Matthew Hughes (65 acres) and William Hayes ('Bally-Hayes Estate,' 100 acres) between 1816 – 1818 (Figure 3). There is limited documentary evidence available concerning these original land holders and the uses of their land grants. In the Badgerys Creek and Bringelly districts, smaller grants (100 – 600 acres) generally maintained river frontages and remained largely undeveloped, eventually being incorporated into larger estates (AMBS 2014, 23).

The 1950 aerial imagery shows the study area mostly cleared yet undeveloped, apart from a single small structure located centrally within the site (Figure 4). The land surrounding this shed was likely utilised for grazing purposes and is known to have been a deer farm prior to Inghams' purchase (*Energy Source & Distribution* 2022). Inghams purchased the study area in 1960, establishing a chicken breeding complex

on the site. Aerial imagery would indicate that the complex had been established by the mid-1960s (Figure 5).

The site has been utilised for poultry raising purposes since the 1960s. The poultry farm operation at the study area was relocated by 2018, whilst the poultry sheds and central buildings were demolished by Inghams in 2018, in preparation for future development (Figure 1). The site has remained undeveloped since this point (Figure 6).

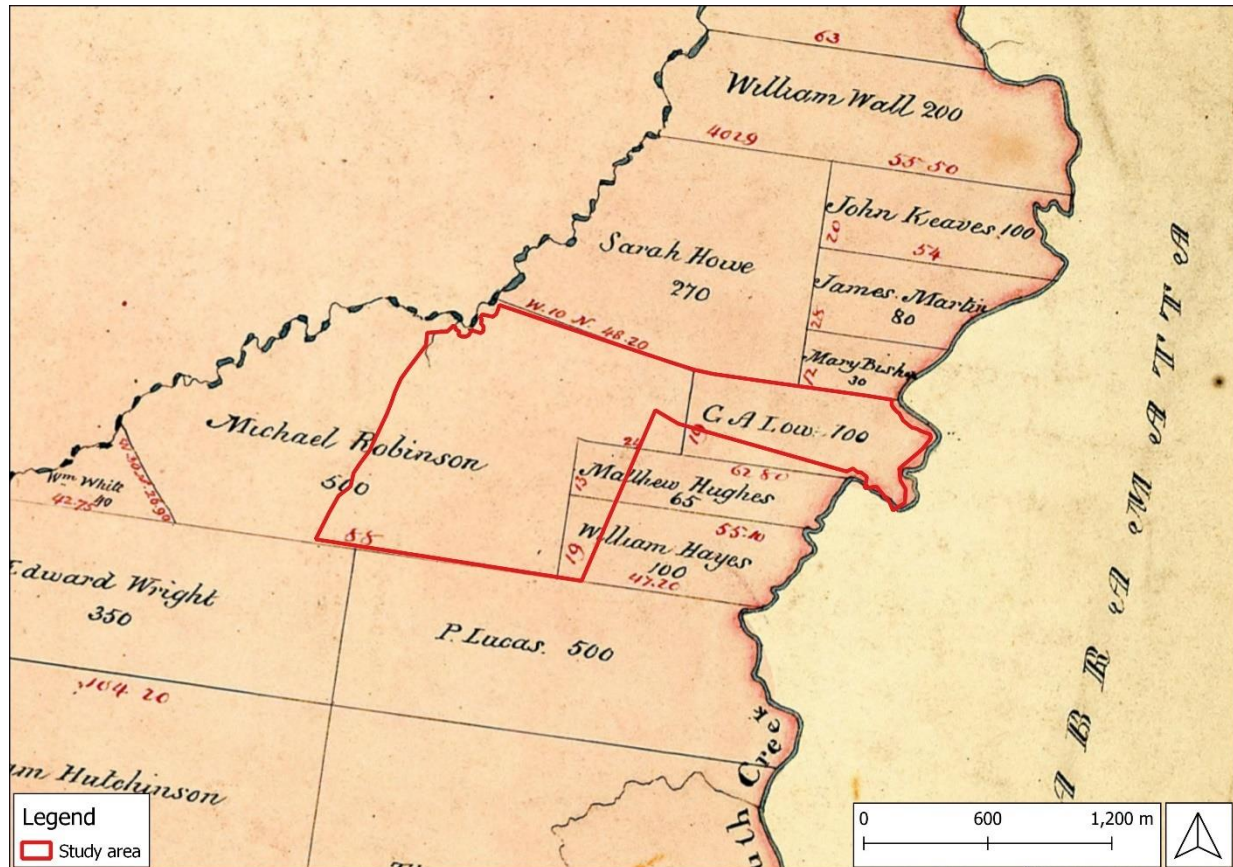


Figure 3: Bringelly parish map, n.d. (Source: HLRV)

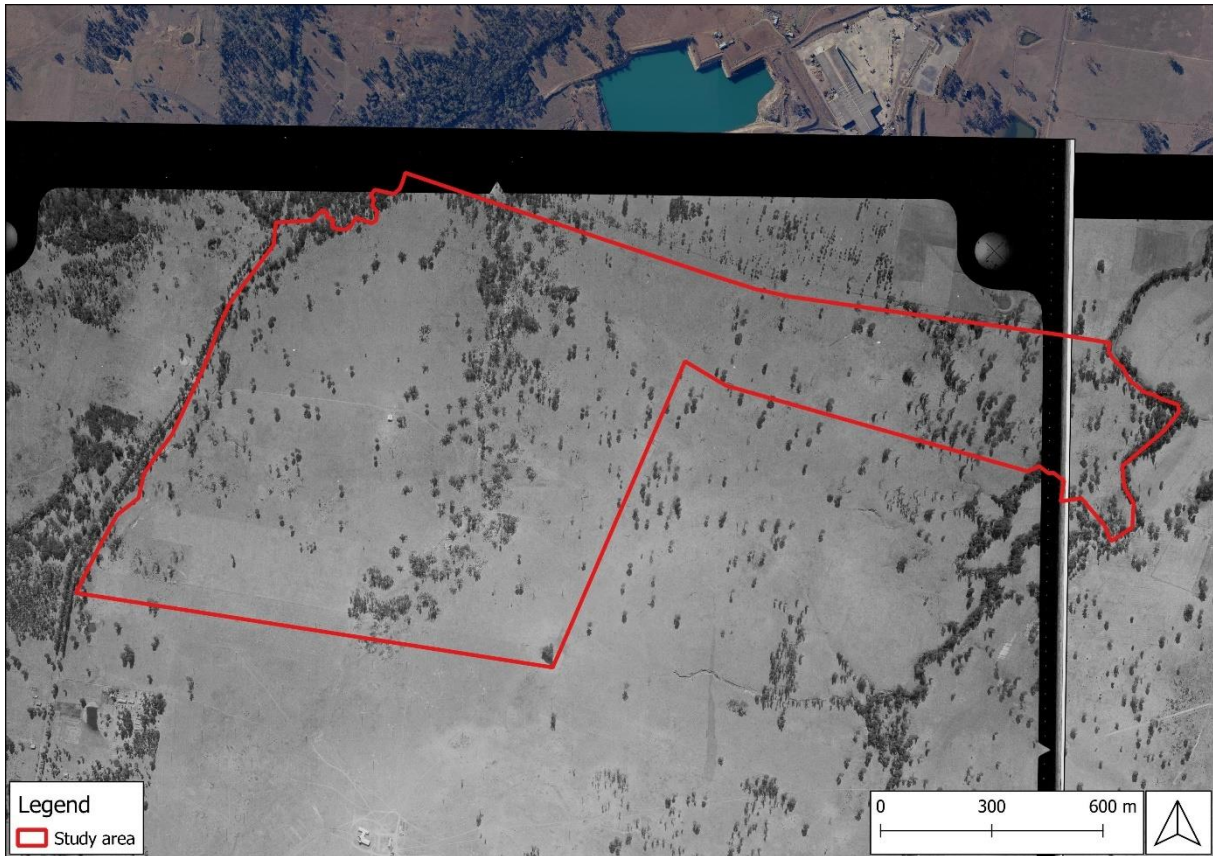


Figure 4: 1950 aerial imagery showing the study area (Source: Spatial Portal)



Figure 5: 1969 aerial imagery showing the study area (Source: Spatial Portal)



Figure 6: 2022 aerial imagery showing the study area (Source: Google Earth)

3. Site description

A site visit was conducted by ELA Senior Heritage Consultant Jennifer Norfolk on 19 November 2021 and 4-5 April 2022. The inspection was undertaken on foot with the use of camera, GPS, and physical maps. The site inspection did not reveal any potential unlisted heritage items within or in the vicinity of the proposed works area, or any potential surface level archaeological resources.

The project area comprises a gently undulating landform, cleared of native vegetation, with open grassland and pockets of regrowth vegetation (Figure 7 – Figure 14) along the creek line. The project area has historically been utilised for poultry farm operations; however, most structures had been demolished at the time of the inspection and the project area is currently being utilised for cattle grazing (Figure 9). There is evidence of landscape modification and past land use across the project area in the form of drainage culverts (Figure 7, Figure 12), fence lines and posts (Figure 8, Figure 9,) remnants of chicken sheds and the existing formed gravel road connecting the former chicken sheds (Figure 10).

The foundations of the former, demolished structures were not observed during the site inspection. Evidence of gardens, fence lines and the locations of the former chicken sheds was still visible.



Figure 7: View of the landscape showing open grassland for grazing and drainage culvert alongside existing road



Figure 8: View of the gently undulating landscape showing open grasslands, regrowth vegetation and existing fences



Figure 9: View of the landscape, showing open grasslands and existing fence posts



Figure 10: View of the landscape showing existing formed gravel road, fences and sheds



Figure 11: View of the landscape within the project area, showing open grassland, flat open landform and regrowth vegetation



Figure 12: View of the landscape within the project area, showing drainage culvert, flat open grassed landform and regrowth vegetation



Figure 13: View within the project area showing old fence post and open grassed landform



Figure 14: View within the project area showing moderate south-north orientated sloping landform

4. Historic archaeological potential

The study area falls within original land grants made to Matthew Robinson, Gustavus A. Low, Matthew Hughes, and William Hayes made between 1816 – 1818 (Figure 3). There is limited documentary evidence available concerning these original land holders and the uses of their land grants. However, smaller grants made within the Badgerys Creek and Bringelly districts are known to have generally maintained river frontages and remained largely undeveloped or utilised for stock grazing. There is no evidence to suggest substantial development within the study area took place during these early phases.

1950 aerial imagery shows the study area mostly cleared yet undeveloped, apart from a single small structure located centrally within the site and a track connecting it to Badgerys Creek Road (Figure 4). The land surrounding this building was likely utilised for grazing purposes and is known to have been utilised as a deer farm.

Inghams purchased the study area in 1960, establishing a chicken breeding complex here by the mid-1960s (Figure 5). By 1969 the central building had been considerably expanded, the chicken sheds constructed, multiple sheds and small dwellings were constructed in association with each group of sheds and roads were constructed linking them. Inghams poultry farm operation at the study area was relocated by 2018 and the poultry sheds and central buildings were demolished in the same year in preparation for future development (Figure 1). The site has remained undeveloped since this point (Figure 6).

The site inspection did not reveal any evidence of surface level archaeological remains apart from evidence of previous fence lines and gardens associated with the post 1950 dwellings. The operation and development of the site has been substantial, with structures built and demolished over time. The majority of the structures on the property post-date the 1950s and therefore will not have significant archaeological resources associated with them. Substantial development of the central structure is likely to have removed any potential resources from previous phases of activity.

The study area has low archaeological potential, and if an archaeological resource is present, it would not meet the heritage criteria to be considered locally significant, nor would it be considered ‘relics’ under the *Heritage Act 1977*.

5. Significance Assessment

Before making decisions to change a heritage item, it is important to understand its values. This leads to decisions that will retain these values in the future. Statements of heritage significance summarise a place's heritage values – why it is important, why a statutory listing was made to protect these values.

The Heritage Council of NSW has developed a set of seven criteria for assessing heritage significance, which can be used to make decisions about the heritage value of a place or item. These include historical, associative, aesthetic, social, research potential, rarity and representative. There are two levels of heritage significance used in NSW: State and local.

5.1. Listing

The subject property is not listed as a heritage item listed under Schedule 5 of the Liverpool Local Environmental Plan 2008 or Schedule 2 of the State Environmental Planning Policy (Western Sydney Aerotropolis) 2020, nor is it located within a Conservation Area.

A search of all relevant heritage databases, including the Australian Heritage Database, was undertaken as part of the assessment, the study area is not listed on the State Heritage Register (SHR), National Heritage List (NHL), Commonwealth Heritage List (CHL) or World Heritage List (WHL).

There are two heritage items located within 1 kilometre of the study area, these are listed below and provided within Figure 15.

Table 1: Heritage listings within the vicinity of the study area

Item	Listing	Address	Significance
'Kelvin'	SHR Listing No. 00046	30 Retreat Road, Bringelly NSW 2556	State
	State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 Item No. I3		
'Mount Pleasant Homestead'	State Environmental Planning Policy (Western Sydney Aerotropolis) 2020 Item No. I4	3 Shannon Road, Bringelly NSW 2556	Local

Due to the significant distance of these heritage items (1 kilometre), development within the study area would not directly (physically) impact their significant heritage values, and is unlikely to impact them indirectly (visually). The Statements of Significance for each item listed in Table 1 are provided in Appendix A.



Figure 15: Heritage items in the vicinity of the study area

5.2. Significance Assessment

The Heritage Council of NSW has developed a set of seven criteria for assessing heritage significance, which can be used to make decisions about the heritage value of a place or item. These include historical, associative, aesthetic, social, research potential, rarity and representative. There are two levels of heritage significance used in NSW: State and local.

The following assessment of heritage significance for the study area has been prepared in accordance with the 'Assessing Heritage Significance' guidelines (2001).

CRITERIA	SIGNIFICANCE ASSESSMENT
A – Historical Significance <i>An item is important in the course or pattern of the local area's cultural or natural history.</i>	The study area falls within original land grants made to Matthew Robinson, Gustavus A. Low, Matthew Hughes, and William Hayes between 1816 – 1818. Early land use was likely for agricultural purposes, whilst livestock grazing was common within the area. There is no evidence of substantial development taking place within the study area during this early ownership, nor are there extant built or potential archaeological remains within the study area that could be certainly linked with this early land use. The study area does not reach the threshold for Local or State significance under this criterion.
B – Associative Significance <i>An item has strong or special associations with the life or works of a person, or group of persons, of importance in the local area's cultural or natural history.</i>	The study area has been utilised for agricultural and farming purposes since point of European settlement / land grant (1816-1818). Whilst Inghams has been in ownership of the property for poultry farming since the 1960s. This ownership is of dubious historical importance, whilst the study area is not considered to maintain strong associations with a particular event, theme, person, or philosophy. The study area does not reach the threshold for Local or State significance under this criterion.
C – Aesthetic Significance <i>An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area.</i>	The study area is not considered aesthetically distinctive, it does not provide positive visual or sensory appeal or landmark and scenic qualities. The site has undergone significant development during the establishment and subsequent demolition of Inghams poultry farm. The study area does not reach the threshold for Local or State significance under this criterion.
D – Social Significance <i>An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons.</i>	A social assessment was not undertaken as part of this heritage assessment; however, documentary evidence would suggest that the study area is not associated with a particular community or cultural group in the local area. The site has been utilised as a poultry farm since the 1960s, however a place of work constructed during the twentieth century is not considered to reach the threshold for significance.

CRITERIA	SIGNIFICANCE ASSESSMENT
	The study area does not reach the threshold for Local or State significance under this criterion.
E – Research Potential <i>An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history.</i>	The study area maintains information readily available from other sources. In addition, documentary evidence would suggest that the site was limited to agricultural grazing land and farming since point of original land grant to present-day. Occupation of the site primarily post-dates the 1950s. As such, the site is not considered to contain any significant archaeological resources. The study area does not reach the threshold for Local or State significance under this criterion.
F – Rarity <i>An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history.</i>	The study area has been utilised as agricultural grazing land and farming since point of original land grant to present-day. At present, the site is cleared agricultural land. The site is not considered rare, nor is its type under threat. The study area does not reach the threshold for Local or State significance under this criterion.
G – Representative <i>An item is important in demonstrating the principal characteristics of a class of NSWs (or the local area's):</i> • <i>cultural or natural places; or</i> • <i>cultural or natural environments.</i>	The study area has been utilised as agricultural grazing land and farming since point of original land grant to present-day. At present, the site is cleared agricultural land. The site is not considered representative, nor is its type under threat. The place is not held in high esteem by the people who use it. The study area does not reach the threshold for Local or State significance under this criterion.

5.3. Statement of significance

The study area does not reach the threshold for Local or State significance under the heritage criteria for historic, associative, social, aesthetic, research potential, rarity, or representativeness.

6. Legislative and conservation requirements

6.1. Statutory Controls

6.1.1. *Heritage Act 1977 (New South Wales)*

The *Heritage Act 1977* (NSW) provides protection of the environmental heritage of the State which includes places, buildings, works, relics, movable objects or precincts that are of State or local heritage significance.

The NSW State Heritage Register (SHR) is the statutory register under Part 3A of the NSW Heritage Act. Listing on the SHR means that any proposed works or alterations (unless exempted) to listed items must be approved by the Heritage Council or its delegates under section 60.

Section 57(2) of the Heritage Act provides for a number of potential exemptions to Section 57(1) approval requirements to reduce the need for approval of minor or regular works such as maintenance. Exempted development does not require prior Heritage Council approval. Standard exemptions do not apply to the disturbance, destruction, removal or exposure of archaeological relics.

Archaeological features and deposits are afforded statutory protection by the 'relics provision'. Section 4(1) of the Heritage Act (as amended 2009) defines 'relic' as *any deposit, artefact, object or material that relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and is of State or Local heritage significance*. The 'relics provision' requires that no archaeological relics be disturbed or destroyed without prior consent from the Heritage Council of NSW.

Archaeological sites that are not located within a state heritage curtilage are protected under Section 139-140 of the *Heritage Act 1977* (Heritage Act). A person must not disturb or excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damage or destroyed unless the disturbance or excavation is carried out in accordance with an excavation permit.

The Heritage Council must be notified on the discovery of a relic under Section 146 of the Heritage Act.

- The site is not State listed nor are there any known archaeological sites. No approvals are required from the Heritage Council.

6.1.2. *Environmental Planning and Assessment Act 1979 (New South Wales)*

The *Environmental Planning and Assessment Act 1979* (EP&A Act) requires that consideration is given to environmental impacts as part of the land use planning process. In New South Wales, environmental impacts are interpreted as including cultural heritage impact. Proposed activities and development are considered under different parts of the EP&A Act, including:

- Major projects (State Significant Development under Part 4.1 and State Significant Infrastructure under Part 5.1) require the approval of the Minister for Planning;
- Minor or routine developments requiring local council consent are usually undertaken under Part 4 activities which, in limited circumstances, may require the Minister's consent; and

- Part 5 activities which do not require development consent. These are often infrastructure projects approved by local councils or the State agency undertaking the project.

Notwithstanding this, under Section 5.5 of the EP&A Act, a determining authority has the duty to fully consider the environmental impact of an activity and is required to “take into account to the fullest extent possible all matters affecting, or likely to affect the environment” arising from the proposal. This is facilitated through the current assessment, the purpose of which is to identify, assess, and determine the significance of potential heritage impacts, as well as mitigating actions and responsibilities that can be taken to minimise potential impacts.

7. Conclusion and Recommendations

The study area is considered to have no local or State heritage significance. There are two heritage items located within 1 kilometre of the study area. Due to the considerable distance of these heritage items, it is unlikely that development within the study area would result in a direct (physical) or indirect (visual) impact to their significant heritage values. As such, the preparation of a Statement of Heritage Impact (SoHI), or additional historic heritage reporting, would not be required for proposed future development within the study area.

Whilst the study area has been assessed as having no archaeological potential, it is best practice to adopt an unexpected finds procedure for sites within NSW, it is recommended that the following procedure be adopted during future development of the site.

Unexpected finds procedure

An 'unexpected heritage find' can be defined as any unanticipated archaeological discovery, that has not been previously assessed or is not covered by an existing approval under the *Heritage Act 1977* (Heritage Act) or *National Parks and Wildlife Act 1974* (NPW Act). These discoveries are categorised as either:

- Aboriginal objects (archaeological remains i.e.: stone tools),
- Historic (non-Aboriginal) heritage items (archaeological remains (i.e., artefacts) or movable objects),
- Human skeletal remains.

Should any unexpected historical archaeology be uncovered during any future excavation works, the following procedure must be adhered to:

- Stop all work in the immediate area of the item and notify the Project Manager.
- Establish a 'no-go zone' around the item. Use high visibility fencing, where practical. Inform all site personnel about the no-go zone.
- No work is to be undertaken within this zone until further investigations are completed.
- Engage a suitably qualified and experienced Archaeologist to assess the finds.
- If the item is assessed as not a 'relic', a 'heritage item' or an 'Aboriginal object' by the Archaeologist, work can proceed with advice provided in writing.
- The Heritage Council must be notified if the finds are of local or state significance. Additional approvals will be required from Heritage NSW and additional recording or salvage before works can recommence on site.

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Appendix A: Statements of Significance

'Kelvin' (SHR Listing No. 00046; SEPP [WSA] 2020 Item No. 13)

The following Statement of Significance has been taken, and amended where necessary, from the State Heritage Inventory (SHI) listing for 'Kelvin':

'Kelvin Park, including the homestead complex and remnant of farmland is considered significant at local, regional, State, and National levels. All areas of the site are considered equally significant.'

Kelvin Park, formerly known as Cottageville or Retreat Farm, demonstrates the pastoral development of Bringelly from 1818. Although there is only a remnant (9.784 ha) of the original 1200-acre site (486 ha), the homestead and farm buildings in their current setting with extensive views over rural land, is still able to demonstrate the principles of nineteenth century farm estate architecture, planning and design.

Kelvin Park is significant for its association with several people and organisations of importance in NSW's cultural history, including Thomas Laycock Jnr. who established the farm at Bringelly, and later owners, John Thomas Campbell and Alfred Kennerley. The lease of the property by the Australian Agricultural Company, the country's oldest agricultural and pastoral development company established in 1824, is of particular significance.

The homestead at Kelvin Park retains its colonial Georgian single-storey form and planning and is representative of a gentleman's rural residence of the 1820s. Despite some modifications it retains the architectural elements and character that make it a good example of its type. The kitchen wing and servants' quarters are modest examples of early colonial Georgian style architecture but similarly retain their original form and planning. All these buildings are evidence of the establishment of a home and farm by Thomas Laycock.

The brick coach house at Kelvin Park retains its picturesque, early Victorian form, planning and much of its original detailing. It is evidence of the development of the property in the 1850s by Alfred Kennerley, who later become Premier of Tasmania.

The two slab barns are evidence of Kelvin Park as a working farm from 1818 until, at least the mid-twentieth century. The structures demonstrate nineteenth century building methods and farm practice. The buildings at Kelvin Park belong to an important and rare group of colonial Georgian and early Victorian farm buildings that contribute to the historic rural landscape. They are evidence of continuity of land use for farming for 187 years (to 2005).

The form of, and elements within, the garden, courtyard areas and entry to the property are evidence of the planning of the homestead complex by Laycock and subsequent owners and express the status they hoped to convey.

The homestead of Kelvin Park retains important historic views to the east to Thompson's Creek and beyond to South Creek. The site also retains views of other historically related rural landscapes beyond the current boundaries such as the pasture and stands of trees to the north. Both views contribute to the site's significance and maintain the context of the homestead group.

The Kelvin Park site landscaping is a significant component of the Kelvin Park group. The early numerous tree plantings contribute to making the site a notable landmark in the area. The remaining details of driveways, fencing and entrances also contribute to the historic and social evidence provided by the site of its original patterns of occupation and use. The site is part of an intact early nineteenth century farm complex that is now rare within the wider urbanised environs of Liverpool. There is the potential to gain more information on the site from further archaeological and documentary research.

The setting of the house on a knoll above a creek, its remnant layout of early buildings and garden, and its fine, mature trees, particularly its variety of old pines, add greatly to the character and significance of the property. The garden and setting are considered to have regional significance. Built by Thomas Laycock junior, 1820, having received the Bringelly grant in 1818. He returned to Australia in 1817 after fighting for England in the American War of 1812. An early house of quality and rich historical associations being one of the charming country houses of the 1820s. It is well sited above Thompson's Creek and is surrounded by a beautifully landscaped garden.'

'Mount Pleasant Homestead' (SEPP [WSA] 2020 Item No. 14)

The following Statement of Significance has been taken, and amended where necessary, from the SHI listing for 'Mount Pleasant Homestead':

'Mount Pleasant is an intact example of a Federation farm cottage in the western districts of Liverpool. The form and shape of the original house are representative of a typical Australian country house with the main roof extending at a lower pitch over open verandahs. Much original fabric and detailing has been retained. There is the potential to gain more information on the site from further architectural, archaeological, and documentary research.'

