



artefact

5 June 2026

Mark Withnall
Homes NSW
10 Darcy Street
Parramatta NSW 2150

Dear Mark,

Re: Aboriginal Heritage Due Diligence Report – 72 and 82-86 Menangle Park Road, Camden

Artefact Heritage and Environment Pty Ltd (Artefact) have been engaged by Homes NSW to prepare an Aboriginal Heritage Due Diligence Report for a housing development located at 72 and 82-86 Menangle Park Road, Camden.

This report outlines the results of an Aboriginal Heritage Impact Assessment (AHIA) which meets the requirements of the [Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales](#) (Department of Environment, Climate Change and Water [DECCW] 2010a), hereafter the Due Diligence Code of Practice.

This report has been prepared by Nicholas Turvey (Graduate Heritage Consultant, Artefact Heritage) with management input and review provided by Sammuel Sammut (Senior Heritage Consultant, Artefact Heritage).

1.1 Project information

This AHIA has been prepared as part of the Environmental Impact Statement (EIS) for a State Significant Development (SSD) application and concurrent rezoning for a social and affordable housing development at 72 and 82-86 Menangle Road, Camden. The study area is located within the Camden Local Government Area (LGA) and the bounds of the Tharawal Local Aboriginal Land Council (LALC). The study area has a combined site area of 7,184sqm. The lots are legally described as Lot 73-77 in DP21405, Lot 86 in DP21405, and Lots 1-3 in DP24039. The study area is currently occupied by three 1960s brick cottages, the former Camden Nurses' Quarters, and a former NSW Health car park. The study area has frontage to Menangle Road and Gilbulla Avenue. It is located opposite Camden Hospital and is approximately 600 metres from the Camden Town Centre, which provides a range of essential services, retail, and civic facilities. A bus stop is located directly in front of the study area on Menangle Road and Don Moon Memorial Reserve is located less than 250m from the study area. To the south and east, the study area is surrounded by low density residential housing.

The SSDA seeks approval for the construction of two residential flat buildings comprising a total of 95 social and affordable housing dwellings. The SSD application seeks consent for the following:

- Site preparation works, including excavation.
- Construction of two residential flat buildings containing 95 dwellings for the purpose of social and affordable housing.
- Construction of one level of basement parking for each residential flat building.

- Associated landscaping and communal open space.
- Infrastructure servicing.

1.2 Housing SEARs and Due Diligence Process

The project has been declared a State Significant Development (SSD) under Division 4.7 of the Environmental Planning and Assessment Act 1979. This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-116982991) on 11 May 2026. The relevant issues and assessment requirements of the SEARs pertaining to Aboriginal cultural heritage were as follows:

SEAR	Supporting Documentation
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20. Aboriginal Cultural Heritage

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

Therefore, this AHIA will satisfy requirement 20 of the SEARs. This assessment follows the standards for initial assessment of potential impacts to Aboriginal heritage set out in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water [DECCW] 2010; Henceforth the Due Diligence Code of Practice).

Undertaking Due Diligence involves reasonable and practical steps to:

1. Identify whether or not Aboriginal objects are, or are likely to be, present in an area
2. Determine whether or not their activities are likely to harm Aboriginal objects (if present)
3. Determine whether further assessment is required

Undertaking Due Diligence does not constitute consent to harm Aboriginal objects, nor are they a 'site clearance' mechanism to allow activities to occur in an area where Aboriginal objects are likely or known to be present. Consultation with the Aboriginal community is not a formal requirement of the Due Diligence process, however, consideration of undertaking some form of consultation should occur, particularly if it will assist in informing any decision-making. If an ACHAR will be required, consultation must be undertaken in accordance with the requirements of Section 60 of the *National Parks and Wildlife Regulation 2019*, as described in the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010b).

Figure 1: Study Area



2.0 DESKTOP ASSESSMENT

2.1 Aboriginal Heritage Information Management System (AHIMS) search

NOTE: The location of Aboriginal sites is considered culturally sensitive information. It is advised that this information, including the AHIMS data appearing on the heritage map for the proposal be removed from this report if it is to enter the public domain.

A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client ID 1092432) was completed on 16 February 2026 for a search area measuring approximately 8 km x 8 km that encompasses the study area (Figure 2). The parameters of this search were:

GDA 1994 MGA 56 283172.81 – 291172.81 m E
6224420.87 – 6232420.87m N

A total of 69 registered Aboriginal sites were identified within the search area (Figure 2). One site identified through the search has since been deleted. Therefore, the final total is equal to 68. There were 0 registered Aboriginal sites within the study area. The closest AHIMS site identified in the search, AHIMS ID 52-2-4530, is located approximately [REDACTED] of the study area (Figure 3). AHIMS ID 52-2-4530 was an area of PAD identified by Artefact Heritage in 2020. AHIMS ID 52-2-4530 is located on an elevated flat near the banks of the Nepean River.

A summary of the sites identified within the search area is provided below (Table 1). The most frequently identified site within the study area are 'Artefact' sites (n=47 69%). When combined with the 'Artefact, Potential Archaeological Deposit (PAD)' sites (n=8, 12%), 'Artefacts' sites are dominant within the landscape, representing 55 of the 68 sites identified within the search. This high representation of sites identified with 'Artefacts' reflects both their ubiquitous nature and robusticity to survive within the archaeological record.

The AHIMS sites identified with the search area display follow site patterning reflective of the landscape upon the sites were recorded. Firstly, a high proportion of AHIMS sites (n=42, 62%) were identified within open green spaces, such as parklands and reserves. This patterning may result from the lack of development in these locations, preserving the archaeological sites contained within. Secondly, 25 AHIMS sites (37%) were identified along ridgelines and areas of high elevation. Crests and higher elevation areas may be represented in the data due to the potential for survival of archaeological contexts in those locations such as from flooding or colluvial soil movement, and perhaps representative of specific activities taking place in those landform contexts. Finally, 34 (50%) of the AHIMS sites were identified within close proximity to a watercourse such as the Nepean River or Narellan Creek. Research has illustrated the correlation between higher order streams and the recorded location of Aboriginal sites (White & McDonald 2010). Moreover, predictive modelling suggests land in proximity to areas of abundant resources used by Aboriginal people were favourable for past occupation (Owen & Cowie 2017).

Table 1: Frequency of site features in AHIMS search results

Site Types	Frequency	Percentage
Artefact	47	69%
Artefact, Potential Archaeological Deposit (PAD)	8	12%
Potential Archaeological Deposit (PAD)	8	12%

Site Types	Frequency	Percentage
Modified Tree (Carved or Scarred)	5	7%
Total	68	100.00%

2.2 Existing archaeological works relevant to understanding the archaeological context of the study area

Existing Aboriginal heritage studies relevant to the study area are summarised in Table 2.

Table 2: Summary of existing Aboriginal heritage studies relevant to the study area

Title of report / author /year	Summary of relevance to the study area
5 Towra Court, Harrington Park Archaeological, Apex Archaeology 2023	In 2023 Apex Archaeology prepared both a Due Diligence and ACHAR for the study area at 5 Towra Court, Harrington park, located approximately 6.4 km northeast of the study area. The report was situated within the Camden LGA upon the Blackstown soil landscape. The reports found that extensive historical land clearance and revegetation had occurred across the study area. Further, the reports noted that visual inspection identified no surface artefacts, and that the landform was “narrow and steep”, decreasing the likelihood that the ridgeline would have been utilised as an Aboriginal camp site. Therefore, it was determined that there were no Aboriginal sites or potential archaeological deposits within the study area.
22kV Electrical Feeder Line Route, Camden Park, Camden Aboriginal Archaeological Assessment, Artefact Heritage and Environment 2012.	In 2012 Artefact prepared an Aboriginal Archaeological Assessment for the route of the 22kV feeder line through Camden Park, located 7.4 km southeast of the study area. The report comprised an archaeological survey following the route of the feeder line. No Aboriginal objects or areas of potential archaeological deposit were identified within the study area. Due to the disturbed nature of the study area arising from past agricultural activities, construction, and vehicle movement, the study area was assigned low archaeological potential.
Spring Farm Parkway Aboriginal Cultural Heritage Assessment, Kelleher Nightingale Consulting, 2019	In 2019 Kelleher Nightingale Consulting (KNC) completed an ACHAR for the construction of the Spring Farm Parkway, located 7.2 km southeast of the study area. The ACHAR involved an archaeological test excavation at three areas of PAD. The excavations identified three subsurface archaeological deposits within the three separate excavation areas, though each site was assigned low archaeological significance due to disturbances arising from erosion and flooding.

Title of report / author /year	Summary of relevance to the study area
Archaeological Assessment of Proposed Soil & Sand Extraction, Menangle Park West, Jo McDonald Cultural Heritage Management, 2009	Jo McDonald CHM conducted an archaeological assessment in Menangle Park West, located approximately 5.1 km southeast of the study area. The subject study area was bounded by the Nepean River and Howes Creek. The assessment identified that the study area was located on the Theresa Park soil landscape. The assessment comprised archaeological excavation, wherein 183 lithics were recovered. The majority of artefacts were identified within 200m of Howes Creek on a pale sandy deposit, below 73m Australian Height Datum (AHD). Comparatively few numbers were found above 73m AHD. The highest concentration of artefacts was retrieved from a slower slope overlooking Howes Creek. Elevation and landform were therefore considered to be important factors influencing the distribution of artefacts within the study area. Portions of the study area subjected to cultivation and agriculture frequently returned churned deposits, ranging in depth from 10-30 cm.
Ferguson's Land Premier/Regional Cricket Facility Aboriginal Heritage Due Diligence, Artefact Heritage and Environment 2020.	Artefact completed a due diligence assessment in 2020 for the Ferguson's land cricket ground located 1.39 km northwest of the study area. One area of PAD (AHIMS ID 52-2-4530) was identified within the assessment area. The area was assigned PAD due to its close proximity to two bodies of water (the Nepean River and Matahil Creek) on a raised embankment not subject to erosion. It was inferred that the raised embankment would be less likely to be affected by rain, leaving archaeological deposits insitu.

2.3 Landscape features that indicate the presence of Aboriginal objects

Aboriginal objects are often associated with particular landscape features as a result of Aboriginal people's use of those features in their everyday lives and for traditional cultural activities. Therefore, it is likely that Aboriginal objects will be present on land that is:

- Within 200m of water, or
- Located within a sand dune system, or
- Located on a ridge top, ridge line, or headland, or
- Located within 200m below or above a cliff face, or
- Within 20m of or in a cave, rock shelter, or cave mouth

and is on land that has not been subject to human activity that has changed the lands surface, in a clear and observable manner.

A summary of the study area's context in relation to key landscape features is outlined in Table 3. This summary is based on a review of aerial imagery and topographic maps.

Table 3: Landscape features relevant to the study area

Landscape Feature	Presence in study area
Within 200m of water	No The study area is not located within 200m of a water source. The closest water source is a small non-perennial stream flowing from the Nepean River, located approximately 270m southeast of the study area
Located within a sand dune system	No The study area is not located within a sand dune system. The study area is located upon the Blacktown soil landscape (eSpade 2026).
Located on a ridge top, ridge line, or headland	Yes The study area is located upon the edge of a ridge line, sloping gradually downwards to the southeast. The Old Hume Highway and Menangle Road follow the alignment of this ridge line.
Located within 200m below of a cliff face	No The study area is not located within 200m below of a cliff face.
Within 20m of or in a cave, rock shelter, or cave mouth (Environment 2010)	No The study area is not located within 20m of / in a cave, rock shelter, or cave mouth.

A summary of key environmental context information, including soil types and nearby watercourses, is summarised in Table 4.

Table 4: Key environmental context information relevant to the study area

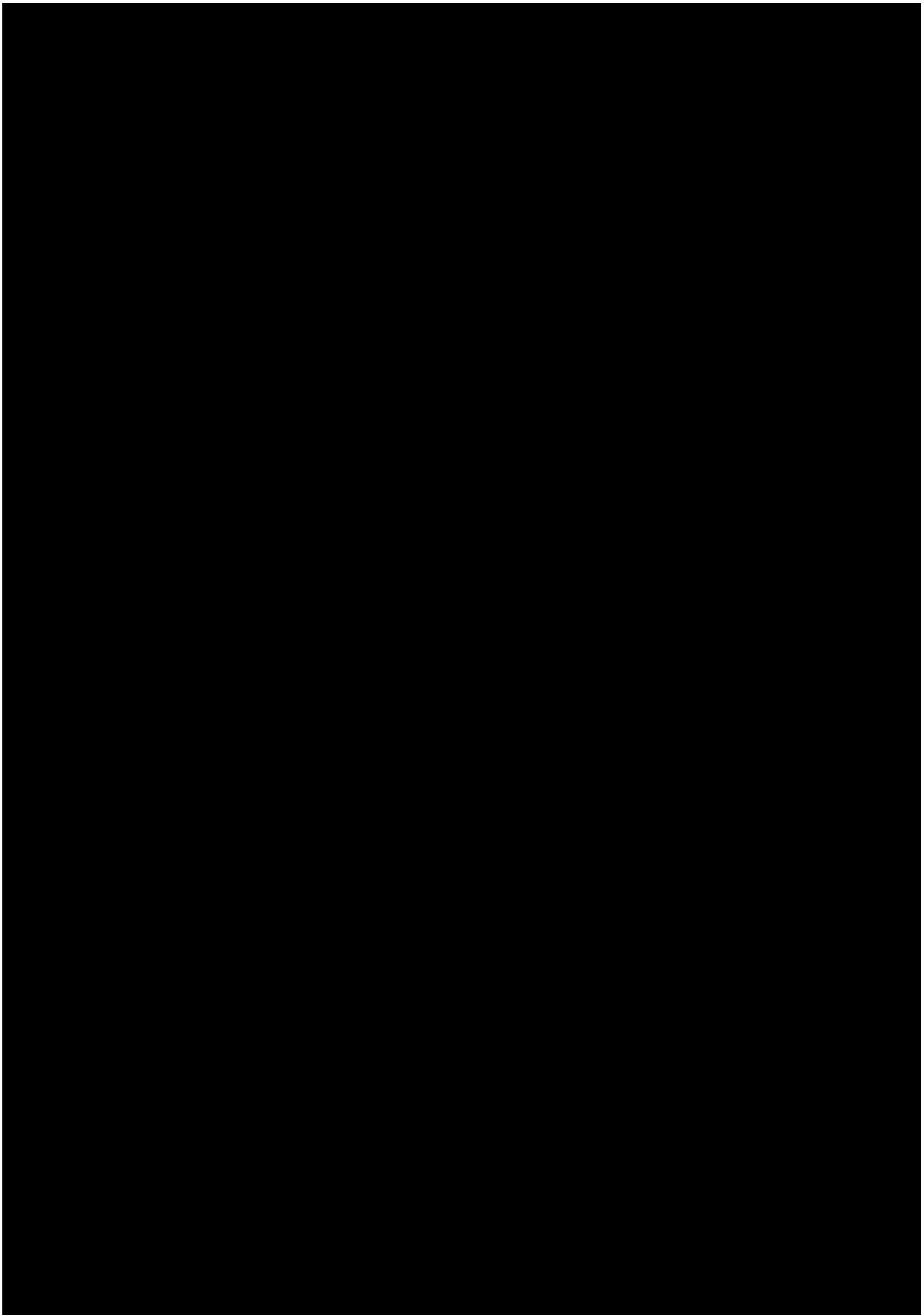
Environmental Context	Description
Soil	The study area is located upon the residual Blacktown soil landscape, typical of much of Western Sydney (Figure 5). The soils are generally shallow (less than 150cm), contain subsoils of very plastic compaction, and are subjected to moderate erosional activities.
Geology	The study area is situated upon the Wianamatta Group Shale. .
Watercourse	The study area is situated within approximately 370 metres of Matahil Creek, located approximately 370m west of the study area, and the Nepean River, located approximately 500m east of the study area (Figure 4). The Nepean River holds cultural and archaeological significance to past and present Aboriginal communities.

2.3.1.1 Disturbance

The [Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales](#) provides the following definition of disturbed land:

Land is disturbed if it has been the subject of a human activity that has changed the land's surface, being changes that remain clear and observable. Examples include ploughing, construction of rural infrastructure (such as dams and fences), construction of roads, trails and tracks (including fire trails and tracks and walking tracks), clearing vegetation, construction of buildings and the erection of other structures, construction or installation of utilities and other similar services (such as above or below ground electrical infrastructure, water or sewerage pipelines, stormwater drainage and other similar infrastructure) and construction of earthworks.

Desktop analysis of historical aerials demonstrates that portions of the study area have been subjected to ground disturbing activities. The earliest historical aerials dating from 1949 (Figure 6) demonstrates that there were no structures built upon the study area until 1956, where a rectangular structure, possibly a tennis court, is visible. The first large structure built upon the study area is possibly visible in the 1961 historical aerials, where construction activities for the extant dwelling can be seen (Figure 7). Otherwise, little information can be gained from a study of the historical aerials. It is likely that, historically, the land was utilised for agricultural or pastoral purposes, possibly disturbing the ground surface to some extent.



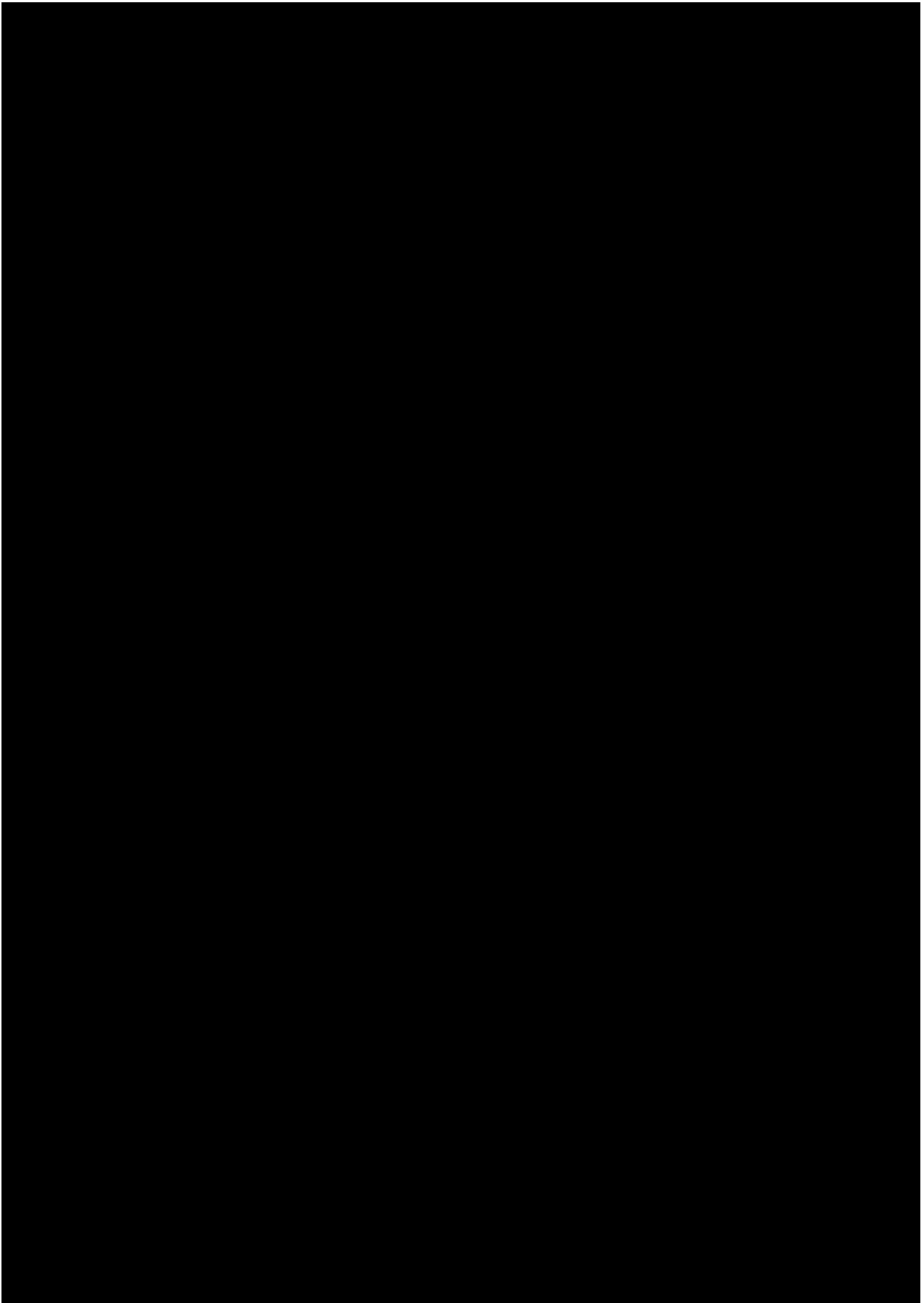


Figure 4: Topographic and hydrographic context of the study area

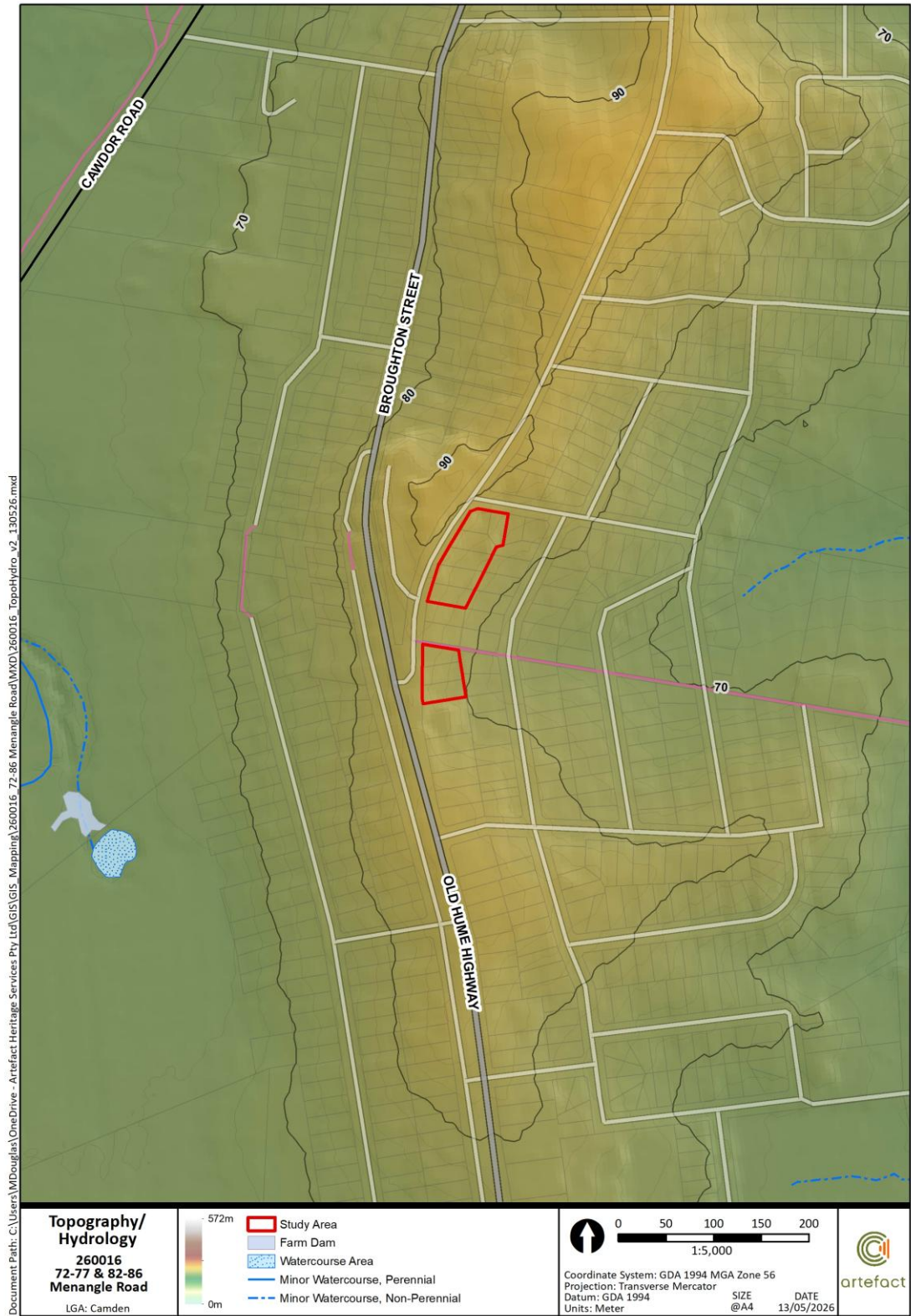


Figure 5: Soil landscapes underlying the study area

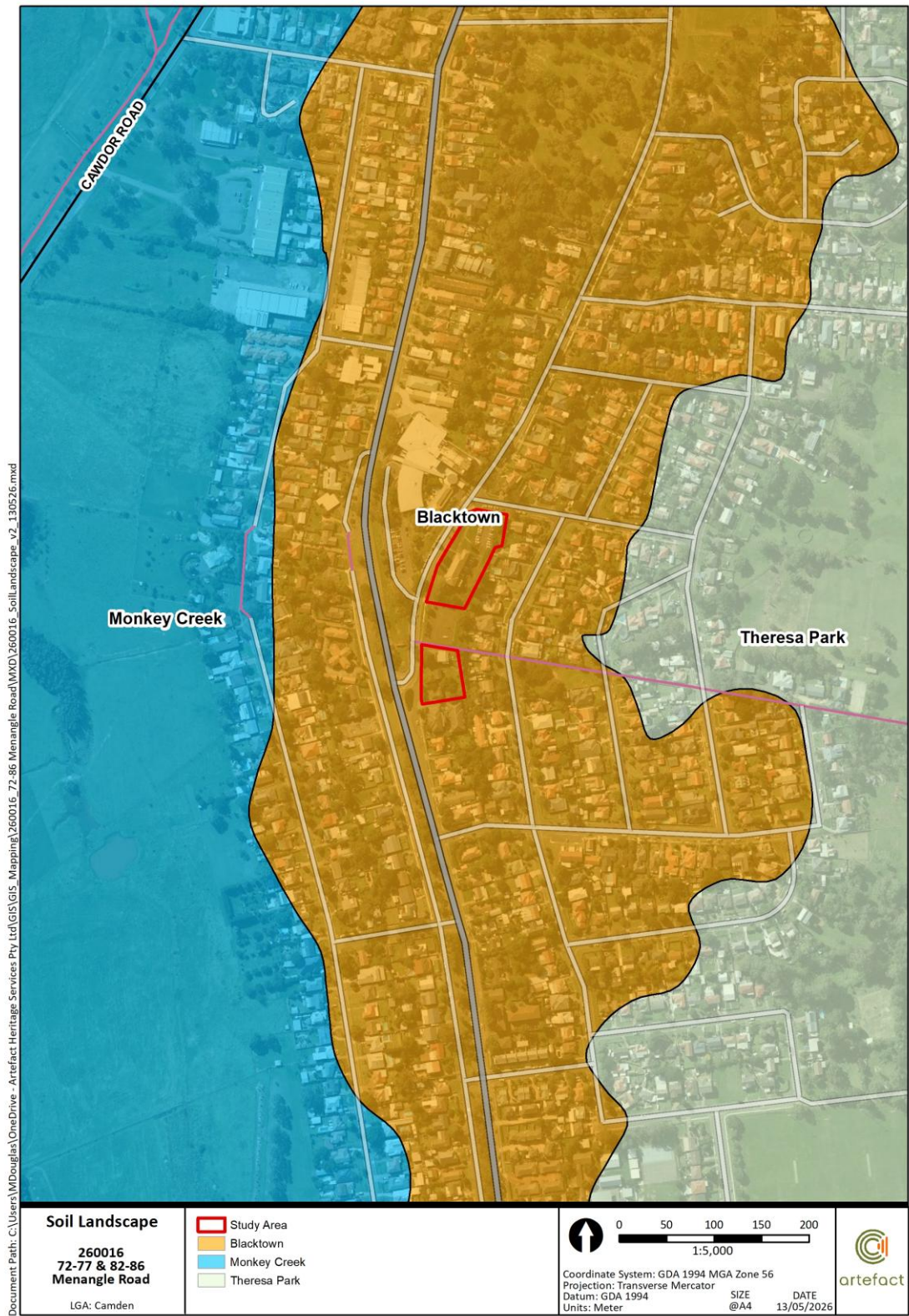


Figure 6: 1949 historical aerial

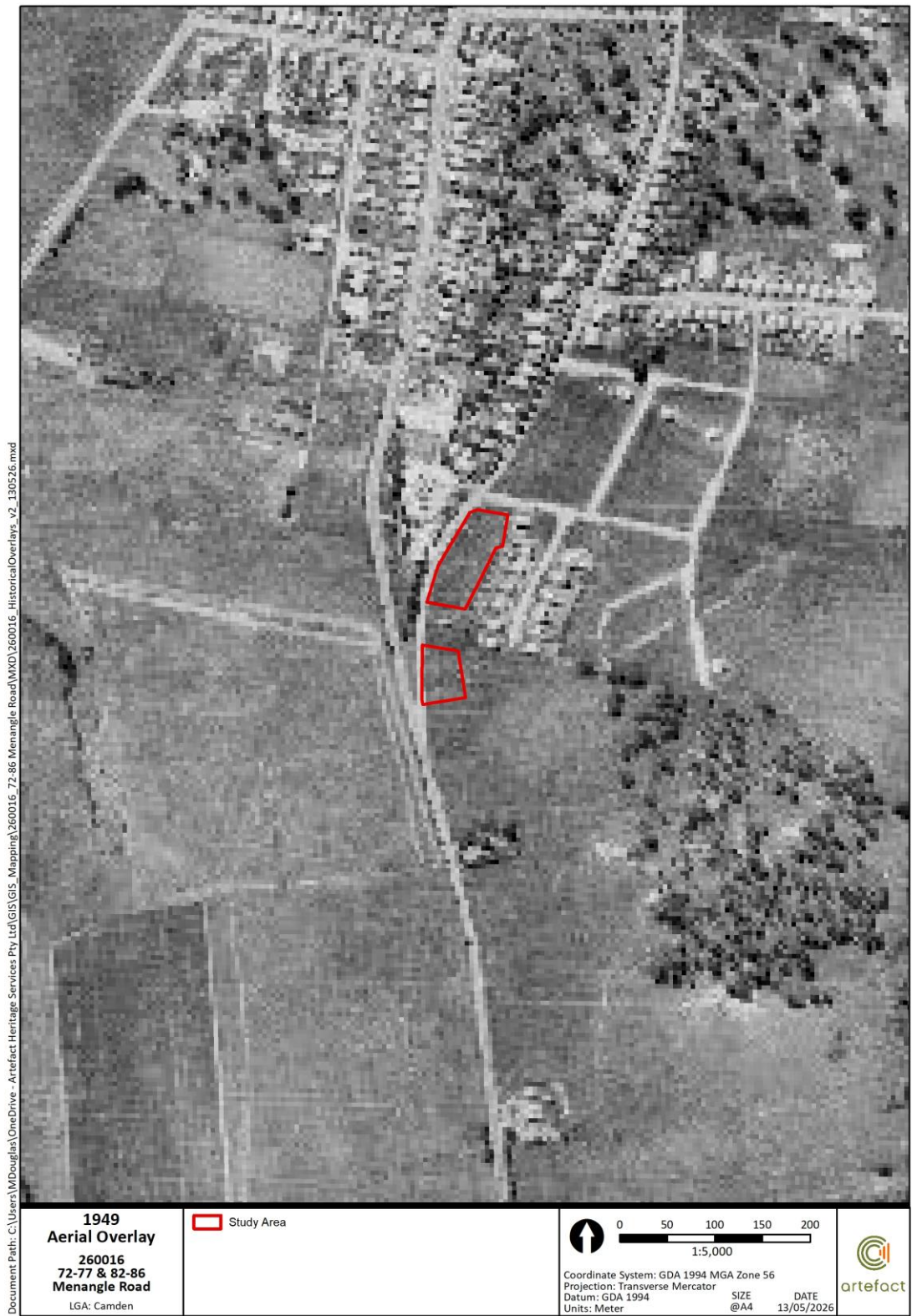


Figure 7: 1961 historical aerial



3.0 SITE INSPECTION

3.1 Visual inspection

The visual inspection was undertaken on 19 February 2026 by Nicholas Turvey (Graduate Heritage Consultant) and Samuel Sammut (Senior Heritage Consultant). The inspection was undertaken during fair weather. The study area is bounded by Menangle Road to the west, Gilbulla Avenue to the north, and residential properties to the east and south. The properties within the study area predominantly contained young native vegetation. No trees bearing cultural modification were identified during the visual inspection. The visual inspection began at the southern extent of the study area within 86 Menangle Road and progressed north, finishing at 72 Menangle Road.

3.1.1 86 Menangle Road

The visual inspection began at the property situated at 86 Menangle Road. The property is occupied by a mid to late 20th century fibro dwelling constructed on raised brick supports (Figure 8). The property naturally slopes from west to east down the side of the ridge line. Ground visibility was generally nil due to overgrown lawns in the west, south, and east of the property. The ground surface underlying the dwelling was exposed, showing a mid-brown clayey soil containing dispersed modern fill material (Figure 9). There was no disturbance identified in the rear of the property to the east. Due to the apparent construction of the building on brick piers, minimal ground levelling was involved in the structure of the house. No obvious subsurface services were identified in this portion of the study area.

3.1.2 84 Menangle Road

The visual inspection continued to the property located at 84 Menangle Road. The property was situated on a gradual slope orientated west to east. The property was occupied by a fibro building contemporary with 86 Menangle Road, constructed on brick piers. Ground visibility was generally nil across both the west and eastern portions of the property due to extensive grass coverage (Figure 10). The ground surface underlying the dwelling was exposed, showing a similar mid-brown clayey soil to the property at 86 Menangle Road (Figure 11). There was no obvious landform modification involved in the construction of the dwelling, due to its construction on brick piers. No subsurface services were identified in this portion of the study area.

3.1.3 82 Menangle Road

The visual inspection proceeded north into the property located at 82 Menangle Road. The property contains a fibro property constructed upon brick piers. 82 Menangle Road was situated on a gradually sloping landform orientated west to east from the edge of Menangle Road (Figure 12). Ground visibility was generally nil due to extensive grass coverage and concrete paving forming the rear garden space and alley to the east and north of the property (Figure 13, Figure 14). However, the south-eastern corner of the property featured an exposure, with mid-brown clayey topsoil visible (Figure 15). Underneath the property the ground surface was additionally exposed and showed a light-brown clayey soil. Overall, minimal landform modification occurred to facilitate the construction of the dwelling at 82 Menangle Road. The western and southern edges of the property also demonstrated minimal signs of disturbance. Several subsurface services were identified within the northern and eastern portion of the property, potentially disturbing the subsurface soil profiles there.

3.1.4 80 Menangle Road

The site inspection then moved north into the property located at 80 Menangle Road. The property slopes steeply from the edge of Menangle Road towards the east. The property was occupied by a large brick structure (Figure 16, Figure 17). The western portion of the property contained a grassy verge sloping eastwards, bordered by a concrete path (Figure 18). Directly east of the structure was an open garden space, containing a large non-native tree. The property was situated upon a gradually sloping landform from west to east.

Portions of the property indicated signs of disturbance. Several subsurface services were identified running through carparks to the north and south (Figure 19). The eastern side of the property was bordered by a steep, grassy embankment, which gradually sloped down to the east (Figure 20). The eastern portion of the property was potentially cut and reformed to create a level surface for the construction of the structure, redepositing fill to create the embankment. Similarly, the northern carpark was likely created through levelling the sloping landform. The embankments surrounding the northern carpark contained loose blocks of sandstone. The sandstone was likely not natural, as it was worked and not associated with the natural geology of the area. Therefore, the sandstone was likely placed as a garden retaining wall, associated with an earlier phase of the property. The landform underlying the structure and the concrete path to the west was additionally levelled during construction.

Portions of the property can therefore be considered disturbed through the construction of the structure, and the installation of the services throughout the property. Though parts of the property contained open grass spaces, the archaeological potential of these spaces is low as erosional activities would likely wash the artefacts further down the west-east slope.

No Aboriginal objects were identified during the inspection. No areas of potential archaeological deposit were identified during the inspection.

Figure 8: Rear of the property at 86 Menangle Road, facing northwest.



Figure 9: Exposure under dwelling at 86 Menangle Road, facing west.



Figure 10: Rear of property at 84 Menangle Road, facing west.



Figure 11: Exposure underneath dwelling located at 84 Menangle Road.



Figure 12: Sloping landform from the edge of Menangle Road outside 82 Menangle Road, facing north.



Figure 13: Front of property at 82 Menangle Road, facing northeast.



Figure 14: Northern edge of 82 Menangle Road, facing west.

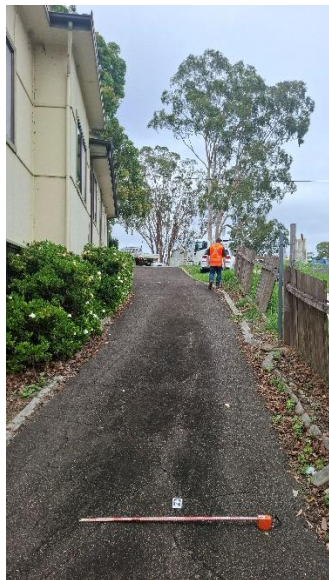


Figure 15: Rear of property at 82 Menangle Road, facing west.



Figure 16: Southern carpark and structure at 72 Menangle Street, facing north.



Figure 17: Northern carpark within 72 Menangle Road, facing northwest.



Figure 18: Western portion of the property at 72 Menangle Road, facing south.

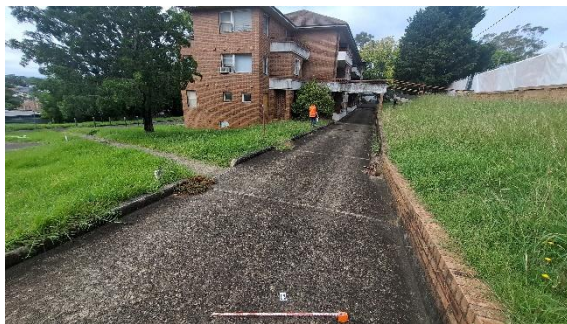


Figure 19: Services located in south of 72 Menangle Road, facing north.



Figure 20: Sloping embankment located at eastern portion of 72 Menangle Road, facing north.



3.2 Summary

The desktop analysis and visual inspection demonstrate that the study area holds low to nil potential to bear archaeological deposits. This is supported by:

- The extensive AHIMS search identified that there are no known Aboriginal sites within the study area. The closest AHIMS site identified was located approximately 1.5km northwest of the study area.
- The AHIMS search identified that the most frequently identified site type were 'Artefact' sites, meaning isolated or scattered stone tools. Though the study area is associated with a ridgeline (an archaeologically significant landform), the study area is situated on the shallow

and moderately erodible Blacktown soil landscape on the mid-slope of the ridgeline.

Therefore, any artefacts present within the study area were likely washed down the slope through anthropogenic or natural soil movement. Consequently, the soils remaining upon the mid-slope can be assigned low archaeological potential.

- A study of archaeological investigations within the Camden LGA and background information relevant to the study area provided context for the present investigation within the study area. Most notably, that:
 - Areas exposed to moderate degrees of disturbance from activities such as construction, agriculture, vehicle movement, erosion and flooding, were unlikely to retain archaeological deposits. If archaeological deposits were retained, they were of low archaeological significance (Apex 2023, Artefact 2012, KNC 2019).
 - Areas situated on landforms not conducive for past Aboriginal occupation are unlikely to bear archaeological deposits (White & McDonald 2010, Owen & Cowie 2017). Conversely, areas within proximity to resource rich zones are more likely to bear Aboriginal Objects (Artefact 2020, Jo McDonald CHM 2009).
- The visual inspection and desktop analysis demonstrated that the study area was subjected to some disturbance associated with landform modification, construction, subsurface services, and erosion. Since the study area is situated on the shallow Blacktown soil landscape, archaeological deposits may have been impacted through these ground disturbing activities. Further, the study area was not situated within proximity to a resource rich zone, such as a creek confluence. Therefore, the archaeological potential of the study area was therefore low.

Therefore, there are no known archaeological deposits within the study area. There is additionally low to nil potential for archaeological deposits to remain within the study area.

4.0 SUMMARY AND RECOMMENDATIONS

A summary of the responses to the Due Diligence questions are provided below (Table 5).

Table 5: Due Diligence questions and responses

Question	Answer	Comment
Will the activity disturb the ground surface or any culturally modified trees	Yes	The proposed works will disturb the ground surface. The visual inspection and AHIMS search did not identify any culturally modified trees within the study area. Therefore, no culturally modified trees will be harmed by the proposed works.
Are there any: - Confirmed AHIMS records - Other sources of information - Landscape features	Yes	The extensive AHIMS search conducted 16 February 2026 found that there are no AHIMS sites located within the study area The study area is situated on the mid-slope of a ridgeline, orientated along the trajectory of Menangle Road.
Can harm to Aboriginal objects be avoided	Yes	As there are no known Aboriginal sites located within the study area, and there is unlikely to be archaeological deposits within the study area, harm to Aboriginal objects can be avoided.
Does a desktop assessment and visual inspection confirm the presence of Aboriginal objects, or that they are likely to be there	No	Though the study area is associated with a ridgeline, the study area is located upon the mid-slope of the ridgeline. Therefore, due to both disturbances noted during the visual inspection, the moderately erosional / shallow nature of the Blacktown soil landscape, and consultation of background literature, it is unlikely that archaeological deposits will be retained within the study area.
Is further assessment required	No	No further assessment is required.

The study area does not contain and is not likely to contain any Aboriginal objects. It is recommended that:

- An Aboriginal Cultural Heritage Assessment Report (ACHAR), or further archaeological investigation is not required. The proposed works can proceed with caution.
- This AHIA does not constitute consent to harm Aboriginal objects, nor it is a 'site clearance' mechanism to allow activities to occur in an area where Aboriginal objects are likely or known to be present.
- If Aboriginal objects are discovered during the proposed works, works must stop immediately and an assessment must be undertaken in accordance with Part 6 of the *National Parks and Wildlife Act 1974*. If the activity cannot avoid harm to Aboriginal objects, works cannot proceed until further investigation is undertaken and correct approvals in place.

5.0 REFERENCES

Apex Archaeology. 2023. *5 Towra Court, Harrington Park Archaeological*. Report to North-Western Surveys.

Artefact Heritage and Environment. 2012. 22kV Electrical Feeder Line Route, Camden Park, Camden Aboriginal Archaeological Assessment. Report to Endeavour Energy.

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Owen, T. D., and D. R. Cowie. "Models to describe Aboriginal lithic artefact site patterning on the Cumberland Plain." *Journal of the Australian Association of Consulting Archaeologists* 5 (2017): 1-13.

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