

Memo: Aboriginal Heritage Consistency Assessment

Project: Project Silverback Oakdale East Industrial Estate (SSD 120888992)	Date: 2 July 2026
To: Lachlan O'Reilly (Planning and Infrastructure Manager, Goodman)	From: Ryan Taddeucci (Principal, Artefact Heritage and Environment)

Introduction

This Aboriginal Heritage Consistency Assessment has been prepared by Artefact Heritage and Environment (Artefact) to address the following Development Applications:

- Concept Plan Amendments (Mod 6): Amendments to State Significant Development Application 37486043 (as modified) in accordance with Section 4.24 of the Environmental Planning & Assessment Act 1979
- Detailed Application (Proposed Works): State Significant Development Application (SSDA) No. 120888992 based on Industry-Specific Secretary's Environmental Assessment Requirements (SEARs) dated 8 May 2026.

Requirement 18 of SEARs 120888992 states that an Aboriginal Cultural Heritage Report (ACHAR) must be prepared to support the application (Table 1). Artefact previously prepared an ACHAR (Artefact 2022) for the Oakdale East Industrial Estate development SSD-37486043, which encompasses the current project area. As Aboriginal Heritage Information Management Systems (AHIMS) data is only valid for 12 months, this Aboriginal Heritage Consistency Assessment includes the results of a new AHIMS search to supplement the existing ACHAR (Artefact 2022). This Aboriginal Heritage Consistency Assessment will consider the results of the new AHIMS search and newly proposed works to update the assessment of impacts for consistency and provided revised mitigation measures (if applicable).

Table 1: SEARs relevant to heritage

SEAR	Supporting Documentation	Response
18. Aboriginal Cultural Heritage Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts to any Aboriginal cultural heritage sites or values associated with the site.	Aboriginal Cultural Heritage Assessment Report	- ACHAR prepared by Artefact in 2022 for SSD-37486043 - This Aboriginal Heritage Consistency Assessment memo

The proposed development is being undertaken by Goodman Property Services (Aust) Pty Ltd (Applicant) on behalf of BGMG 14 Pty Ltd (ACN 661 888 884) as trustee of BGMG 1 Oakdale East Trust No.2 (Owner). The development is located within Lot 109 in DP 1293112, formally referred to as 2-10 Old Wallgrove Road, Horsley Park (the Site – Figure 1).

The below further outlines the respective works the Development Applications seek approval for.

Concept Plan Amendments | State Significant Development Application SSD - 37486043 (Mod 6)

As part of the proposed works under SSD No. 120888992, the following amendments are proposed to the Concept approval and Stage 1 Infrastructure works approved under SSDA 37486043:

- Amendment to approved Masterplan and Subdivision plan to accommodate revised Precinct 2-5 layout which will consolidate Precincts 2, 4 and 5, resulting in a total of three (3) precincts. (Precinct 1, 2 & 3).
- Amendment of Stage 2 infrastructure scope to accommodate revised and consolidated Precinct 2-5 layout
- Amendment of Development Controls, including those prescribed under Condition A9 & A10 of the consent, specifically:
 - Building Height
 - Maximum GLA
- Increase maximum permissible vehicle from a 30 m super B-double to a 36.5m B-triple (Condition D14)

This application, inclusive of the amendments to the Concept approval under SSD 37486043, seeks to facilitate the development of Building 2A, 2B & Lot 2C and associated Internal infrastructure changes.

Detailed Application | State Significant Development Application SSD-120888992

The SSDA seeks approval for the construction, fit-out, operation and use of 2 warehouse buildings and associated internal site infrastructure works to accommodate the proposed building layouts. Specifically, this includes:

- Warehouses and Distribution Building – Building 2A
 - 24/7 warehouse and distribution use.
 - Construction, operation, fit-out (warehouse racking and office fit-out) and use of approximately 18,110 sqm warehouse with ancillary office GLA. Proposed ridge height of 14.6m (excluding rooftop plant and solar).
 - Includes hard stand, dock offices, loading bays, landscaping, electric vehicle charging, solar panels and signage.
- Warehouses and Distribution Building – Building 2B & Lot 2C
 - 24/7 warehouse and distribution use for an automated mail and parcel processing and sorting facility.
 - Construction, operation, fit-out (office and warehouse) and use of approximately 142,157 sqm of warehouse and office GLA across two levels spanning a proposed ridge height of 25.0m (excluding rooftop plant, roof access stairs and solar).
 - Warehouse fit-out includes automation and sortation equipment along with associated mezzanine structures.
 - Building 2B will include hardstand, heavy rigid parking, guardhouses, dock offices, loading bays, landscaping, electric vehicle charging, goods collection lockers, solar panels six lithium-ion battery energy storage systems (BESS) external to the main warehouse building and fleet workshop, weighbridges, fleet workshop, dock temperature control with external units, emergency generators, refuelling bay, truck wash and signage.
 - Dangerous goods (DGs) are proposed to be stored at the site, which are below the threshold quantities under Chapter 3 of the State Environmental Planning Policy (Resilience and Hazard) 2021
 - Ground Improvements to Warehouse 2B building footprint (i.e. pilling), including a 200mm thick layer of Cement Treated Fine Crushed Rock (CTFCR) placed under the entire warehouse footprint.
- Internal Estate Infrastructure
 - Bulk Earthworks to Precinct 2 (formally Precinct 2, 4 & 5)
 - Approximately 550,000m³ fill importation required as either virgin excavated natural material (VENM), excavated natural material (ENM) or Resource Recovery Order under Section 286A of the Protection of the Environment Operations Act 1997 (PoEO Act 1997) Importation proposed to be 24 hours, 7 days a week during the Fill Importation program
 - Export any unsuitable material (i.e Topsoil and Clay)
 - Retaining Walls (including importation of Engineered backfill)

- Stormwater Basin D (including fit-out)
- Construction and associated Easement to Drain of Stage 1 stormwater discharge line through Building 2B to Basin C
- Stage 1 road and servicing amendments to reflect revised Precinct 2, 4 & 5 building layout
- Noise barriers
- Lead-in services including additional 11kv feeder via the extension of HV feeders from existing Endeavour Energy switching stations within Roberts Road and Capicure Drive
- Other
 - Expansion and on-going management of DA 347.1/2021 Containment Cell
 - Subdivision of Precinct 2, 4 & 5 to suit revised precinct plan and ultimate lot layout

Related Applications/Activities

Fairfield City Council Development Application DA 347.1/2021 (as modified) – Rehabilitation Works

A Fairfield City Council Development Application DA 347.1/2021 (as modified) has previously been approved over the site facilitating Bulk Earthworks and Rehabilitation (including an initial Containment Cell) Works at the Site to provide relative levels suitable for future industrial development.

These levels are:

- Precinct 2 (western portion): BE 77.5
- Precinct 2 (eastern portion): BE 71.5
- Precinct 3: BE 77.0
- Precinct 4: BE 70.0

Proposed SSD-120888992 assumes these levels and works in respect of assessment of environmental impacts previously assessed in accordance with Clause 4.63 (a) Environmental Planning & Assessment Act 1979. Further re-assessment is therefore not required.

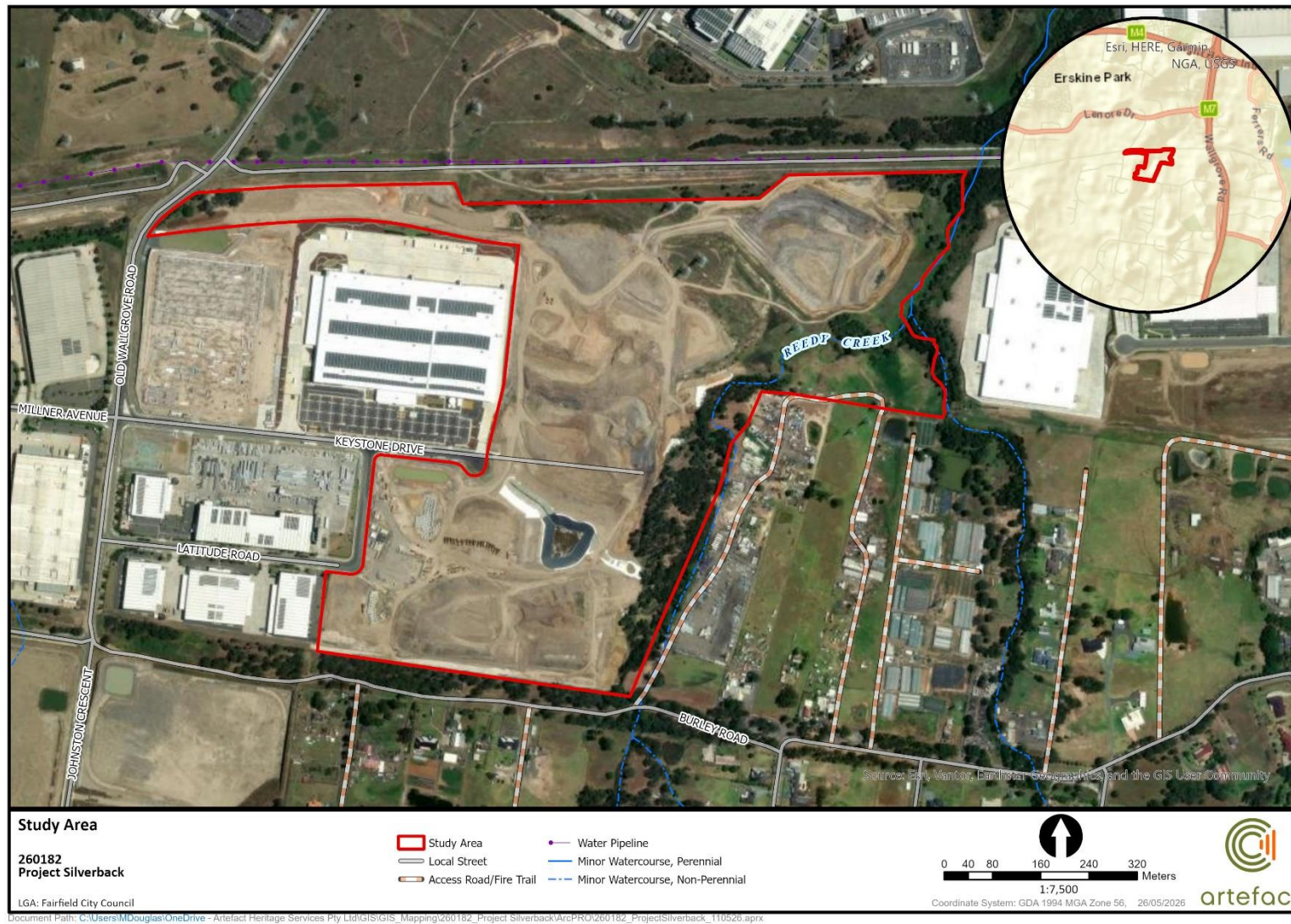
DA 347.1/2021 assessed the Environmental Impacts associated with the required rehabilitation to achieve the above Bulk Earthworks levels.

Notwithstanding, DA 347.1/2021 (as modified) is currently unable to be fulfilled as the consent approves a shortfall of:

- Fill importation required to achieve the above FCC approved rehab levels
- Contamination cell size required to fulfill rehabilitation obligations under the Fairfield City Council consent and associated Rehabilitation Action Plan.

SSD-120888992 assess and seeks approval to address these shortfalls as part of the Environmental Impact Assessment.

Figure 1: Map of the study area



Background

Artefact Heritage 2018 Oakdale East: 224-398 Burley Road, Horsely Park Archaeological Survey Report (ASR)

In 2018 Artefact was engaged by Goodman Group to prepare an Archaeological Survey Report (ASR) for the first stage of the Oakdale East Project. Artefact's 2018 study area encompassed the southern portion of the current study area. The survey identified OE AS1 (AHIMS ID 45-5-5620) and described it as an artefact scatter and associated PAD. Within the rest of the study area, Artefact identified heavy vehicle tracks, extensive landform levelling, deep excavated pits, and quarrying infrastructure. Therefore, Artefact identified this heavily disturbed area, with no natural soil intact above the clay horizon, as unlikely to contain concealed Aboriginal objects.

Artefact Heritage 2021 Oakdale East Industrial Estate Stage 4. Aboriginal Heritage Due Diligence Assessment

Artefact prepared a Due Diligence report for Brickworks Land and Development in 2021. The 2021 study area was largely consistent with the 2025 study area, though it excluded a small parcel of land in the northeast. Artefact's survey of the study area determined that the central and western parts were heavily disturbed due to vegetation clearance, extensive quarrying activity, heavy vehicle movement, and construction work. Artefact noted that no natural soil layers survived this disturbance. The survey reidentified OE AS1 (AHIMS ID 45-5-5620) and six artefacts within the site extent. Artefact determined that the raised flat landform associated with OE AS1 (AHIMS ID 45-5-5620) is consistent with other AHIMS sites located nearby. Therefore, Artefact determined that the heavily disturbed sections of the study area impacted by quarrying were unlikely to contain concealed Aboriginal objects, consistent with the 2018 report.

Artefact Heritage 2022 Oakdale East Industrial Estate Aboriginal Cultural Heritage Impact Assessment Report (ACHAR)

Artefact prepared an Aboriginal Cultural Heritage Assessment Report (ACHAR) for Goodman Property Services, associated with the Oakdale East Industrial Estate development SSD-37486043 (Artefact 2022). The study area investigated for the 2022 ACHAR encompasses the Project Silverback Oakdale East Industrial Estate project area. The 2022 ACHAR found that no AHIMS sites besides OE AS1 (AHIMS ID 45-5-5620) were located within the study area (Figure 3). Site survey and the desktop analysis found that the majority of the 2022 study area was heavily disturbed by quarrying activities since the 1970s, and that OE AS1 (AHIMS ID 45-5-5620) remained undisturbed. Consistent with the 2021 and 2018 reports, it was concluded that land outside the extent of OE AS1 (AHIMS ID 45-5-5620) was unlikely to contain Aboriginal objects. The recommendations from the Artefact (2022: 63-64) ACHAR were:

- As the area in which OE AS1 (AHIMS 45-5-5620) is located will not be impacted by the planned development it is recommended that further archaeological assessment is not required.
- The results of the Aboriginal consultation are [sic] support the results of the ACHAR
- If changes are made to the proposal that may result in impacts to areas not assessed by this ACHAR further assessment would be required.
- If changes are made to the proposal that may result in impacts to OE AS1 (AHIMS 45-5-5620) which has been assessed by this ACHAR, further investigation in the form of test excavation would be required.

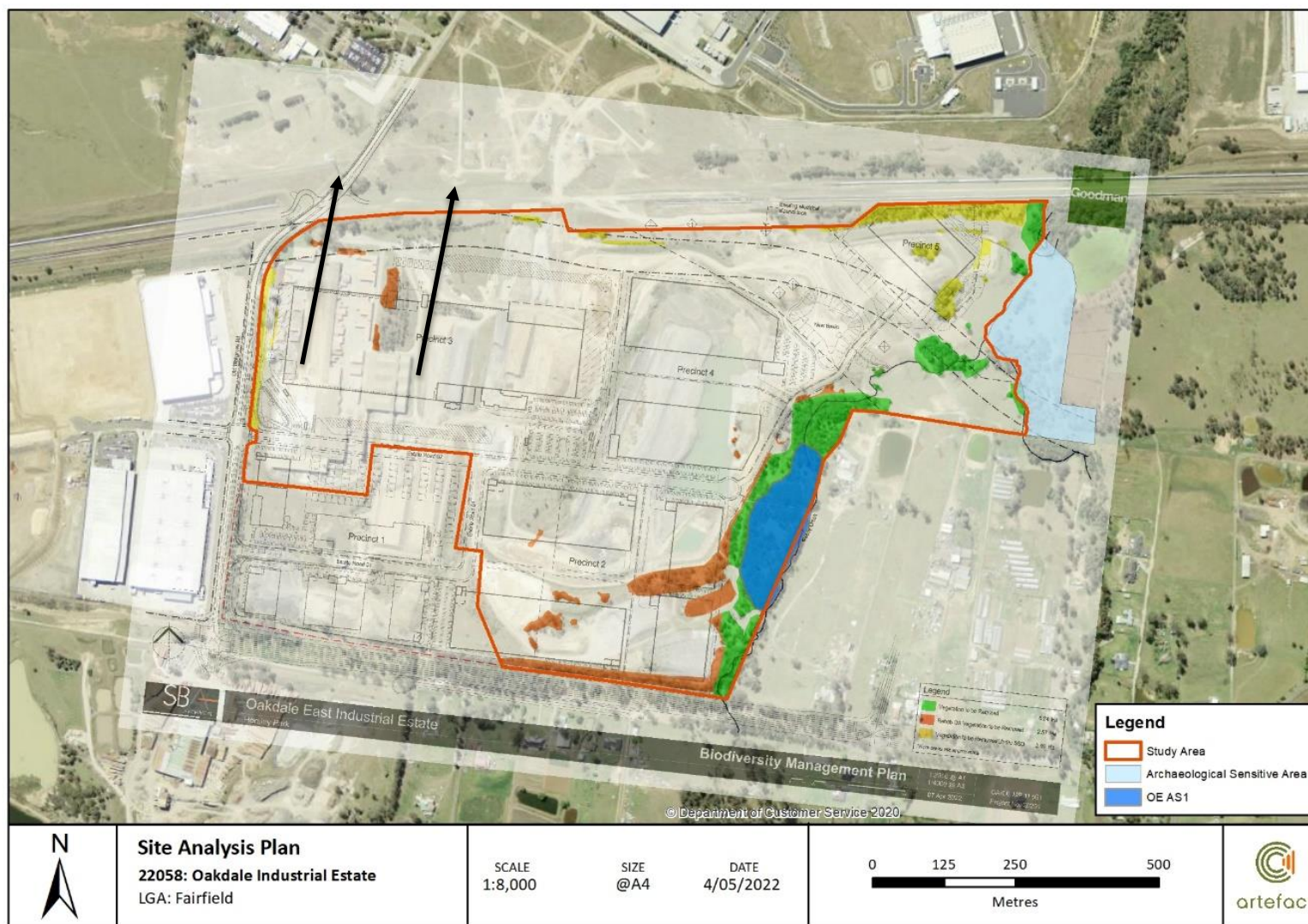
- Unexpected Aboriginal objects remain protected by the National Parks and Wildlife Act 1974. If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find and Heritage NSW and Deerubbin LALC must be notified.
- If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity should cease, the site should be secured, and the NSW Police and Heritage NSW should be notified.

OE AS1 (AHIMS ID 45-5-5620), identified previously as being within the study area, has been fenced off by the client (Figure 2) and will not be harmed by future works. The works will also adhere to the Biodiversity Management Plan, which indicated that the landform containing OE AS1 (AHIMS ID 45-6-5620) will not be disturbed during the development of the industrial estate (Artefact 2022).

Figure 2: Protective fence surrounding OE AS1 (AHIMS ID 45-5-5620) (Artefact 2022)



Figure 3: Map from Artefact (2022: 60) showing the location of AHIMS ID 45-5-5620



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 AHIMS database (Client ID 1121998) was completed on 4 September 2025 for a search area measuring approximately 16km² encompassing the study area. The parameters of this search were:

GDA 1994 MGA 56 297000.0 - 301000.0 m E
6252500.0 - 6256500.0 m N

A total of 56 registered Aboriginal sites were identified within the search area (Figure 4). AHIMS records sites using 20 standard site features of which four were identified (Table 2). The most frequent site feature observed was 'Artefact' (n=50, 89.29%), which are objects such as stone tools, and associated flake material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people. Following was 'Artefact, PAD' (n=2, 3.57%) and 'Potential Archaeological Deposit, (PAD)' (n=2, 3.57%). A PAD is any area where Aboriginal objects may occur below the ground surface, though they are not considered objects unless found in association with an object. The extensive AHIMS search found two such 'Artefact, PAD' sites. There is a correlation between these 'Artefact' and 'Artefact, PAD' sites, and the landforms that they were identified upon (Figure 4). Many of these sites were observed clustered within proximity to creek lines and water ways, on raised flat landforms / lower slopes. It reflects the sustained occupation of the land by Aboriginal communities, as well as the preference for distance to resources such as fresh water. The frequency of these sites is also indicative of the robustness of stone Aboriginal objects to survive within the archaeological record.

The extensive AHIMS search identified two Aboriginal sites within the study area (Figure 5), OE AS1 (AHIMS ID 45-5-5620) and WR1 (Prospect) (AHIMS ID 45-5-3684).

OE AS1 (AHIMS ID 45-5-5620) was identified by Artefact Heritage during an archaeological survey completed in 2018. The site card detailed that it is abutting Reedy Creek to the east on a raised flat landform. The site extent was described as 295m north to south by 100m east to west. In 2022, Artefact recorded the site on AHIMS as a 'Potential Archaeological Deposit (PAD)'. However, a surface 'Artefact Scatter' was also recorded and documented. The 2018 ASR identified 13 silcrete Aboriginal artefacts throughout the extent of the site. The identification of these Aboriginal objects was linked to the physical integrity of the soils, which was described as having minimal disturbance (Artefact 2018).

A second site, WR1 (Prospect) (AHIMS ID 45-5-3684), was an artefact scatter identified in 2008. It was located 40m east of Reedy Creek along the northeast boundary of the study area. The site was registered as 'destroyed' in 2020 and will not be impacted by the proposed works.

Table 2: Frequency of site features in AHIMS search results

Site Types	Frequency	Percentage
Artefact	50	89.29%
Artefact, PAD	2	3.57%

Site Types	Frequency	Percentage
Potential Archaeological Deposit, (PAD)	2	3.57%
Modified Tree	1	1.79%
Modified Tree (Carved or Scarred), Artefact	1	1.79%
Total	56	100.00%

Figure 4: Distribution of AHIMS sites within extensive search area (16m² surrounding the study area)

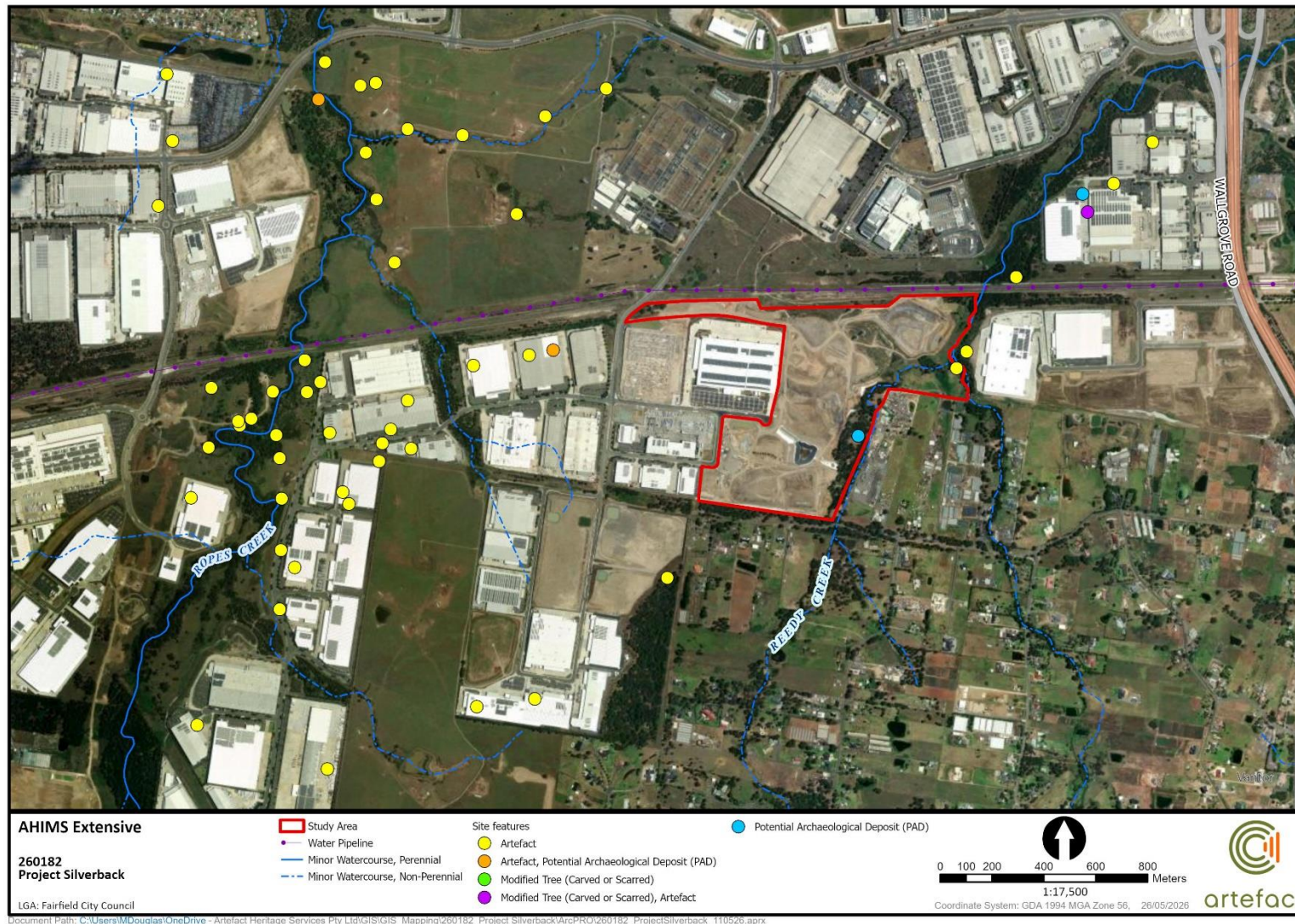
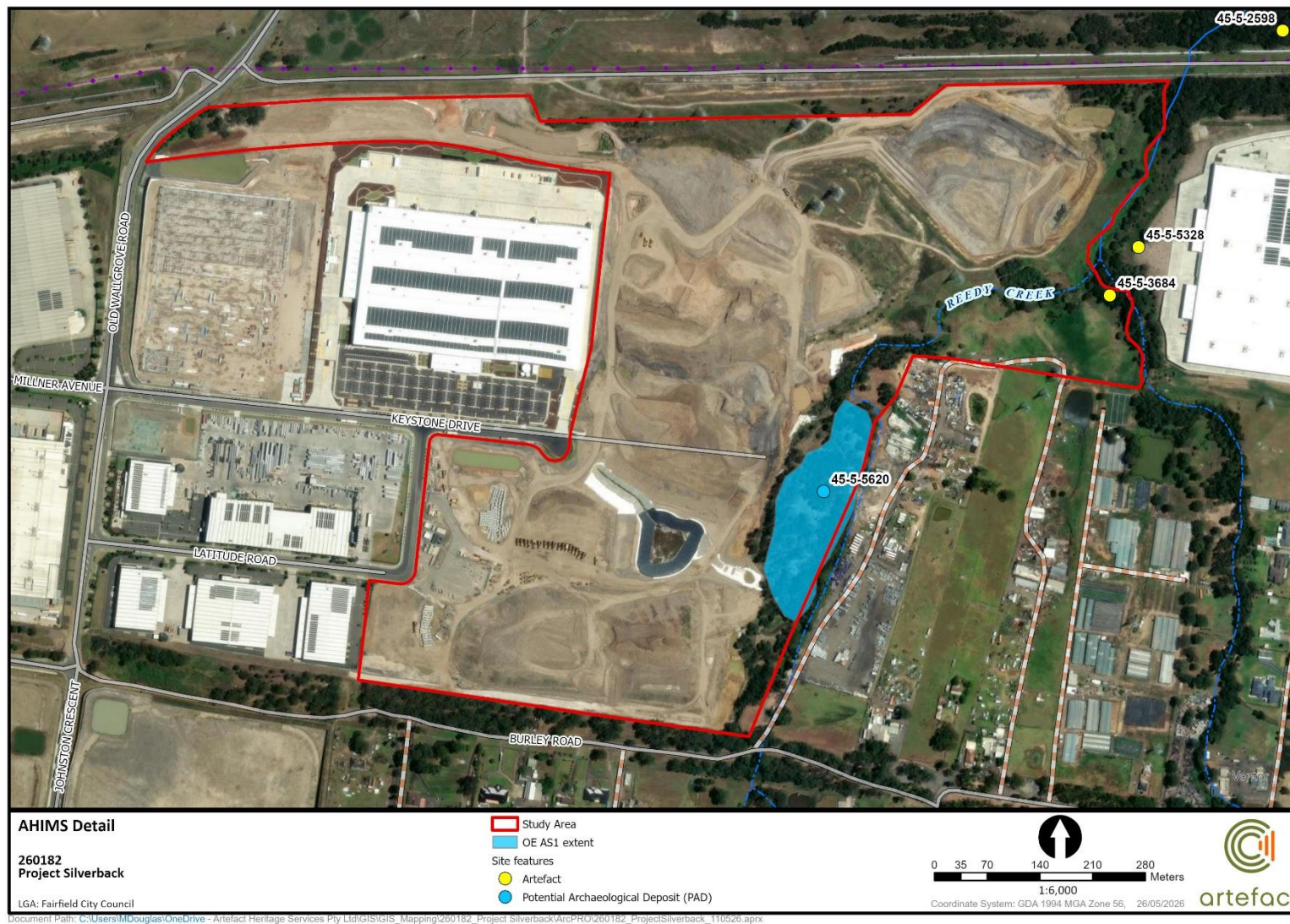


Figure 5: AHIMS sites within the study area



Conclusions

It is understood that the current works impact area (Figure 6) are contained within the impact area assessed by Artefact 2022. This Aboriginal Heritage Consistency Assessment has found that:

- No additional Aboriginal objects were registered on AHIMS within the study area since the completion of the Artefact 2022 ACHAR
- OE AS1 (AHIMS ID 45-5-5620) is not within the proposed works area (Figure 6) and will not be harmed by the proposed works due to the establishment of an fencing which functions as a protective exclusion zone (Figure 2), consistent with the findings of Artefact 2022
- WR1 (Prospect) (AHIMS ID 45-5-3684) is listed on AHIMS as destroyed and is not a constraint to works, consistent with the findings of Artefact 2022

Recommendations

SEARs 120888992, issued on 8 May 2026, states that the EIS must be supported by an ACHAR. This Aboriginal Heritage Consistency Assessment has found that the findings of the ACHAR previously prepared by Artefact (2022) remain valid:

- As the area in which OE AS1 (AHIMS 45-5-5620) is located will not be impacted by the planned development, no further Aboriginal heritage assessment is recommended
- The recommendations from the ACHAR for SSD-37486043 require applicable, principally that:
 - If changes are made to the proposal that may result in impacts to areas not assessed by this ACHAR further assessment would be required.
 - If changes are made to the proposal that may result in impacts to OE AS1 (AHIMS 45-5-5620) which has been assessed by this ACHAR, further investigation in the form of test excavation would be required.
 - Unexpected Aboriginal objects remain protected by the National Parks and Wildlife Act 1974. If any such objects, or potential objects, are uncovered in the course of the activity, all work in the vicinity should cease immediately. A qualified archaeologist should be contacted to assess the find and Heritage NSW and Deerubbin LALC must be notified.
 - If human remains, or suspected human remains, are found in the course of the activity, all work in the vicinity should cease, the site should be secured, and the NSW Police and Heritage NSW should be notified.

Figure 6: Overlay of proposed works plan against known sites

