

A photograph of a dense forest with tall, slender trees and a thick canopy of green leaves, viewed from a low angle looking up. The image is partially obscured by a large, curved, light blue graphic element that sweeps across the bottom half of the page.

# Mamre South Precinct State Significant Development - Proposed Warehouse, Logistics and Industrial Facilities Hub: Cultural Heritage Management Plan

Prepared for Frasers Property Industrial

12 October 2021



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## Glossary

<b>ACHA</b>	Aboriginal Cultural Heritage Assessment
<b>CHMP</b>	Cultural Heritage Management Plan
<b>AHIMS</b>	Aboriginal Heritage Information Management System
<b>AHIP</b>	Aboriginal Heritage Impact Permit
<b>ASIRF</b>	Aboriginal Site Impact Recording Form
<b>CoC</b>	Conditions of Consent
<b>DP</b>	Deposited Plan
<b>DPI</b>	Department of Primary Industries
<b>DPIE</b>	Department of Planning, Industry and Environment
<b>EP&amp;A Act</b>	<i>Environmental Planning and Assessment Act 1979</i>
<b>Heritage NSW</b>	Heritage NSW, Department of Premier and Cabinet
<b>HHA</b>	Historic Heritage Assessment
<b>ICOMOS</b>	International Council on Monuments and Sites
<b>NPW Act</b>	<i>National Parks and Wildlife Act 1974</i>
<b>RAP</b>	Registered Aboriginal Party
<b>Study area</b>	657-769 Mamre Road, Kemps Creek, New South Wales
<b>The Code</b>	<i>The Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i>
<b>The project</b>	Development of industrial infrastructure
<b>WHS</b>	Work Health and Safety



# 1 Introduction

---

This Cultural Heritage Management Plan (CHMP) manages the impacts to Aboriginal and non-Aboriginal heritage during works associated with the Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek, New South Wales (NSW) (the project).

On 21 December 2020 the Minister for Planning issued Development Consent under Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The CHMP forms part of the Construction Environmental Management Plan (CEMP), as required under Condition B59 of the Conditions of Consent (CoC). The CHMP should be read in conjunction with the CEMP.

This CHMP has been prepared in accordance with the CoC's issued by the Minister for Planning. The CoC supersedes the previous draft requirements set out by Heritage NSW, Department of Premier and Cabinet (Heritage NSW) to Bianca Thornton of the Department of Planning, Industry and Environment (DPIE) contained within a document dated 2 September 2020, (Heritage NSW DOC20/675229). This was issued in response to the Aboriginal Cultural Heritage Assessment (ACHA) undertaken by Biosis for the Mamre South Precinct Development in 2019.

The CHMP has been prepared in accordance with the EP&A Act and the *National Parks and Wildlife Act 1974* (NPW Act).

## 1.1 Project background

Biosis was commissioned by Altis Property Partners and Frasers Property Industrial Constructions to undertake an ACHA for the proposed SSD at 657-769 Mamre Road, Kemps Creek, NSW (Biosis, 2020a). The assessment supported an application to DPIE for an SSD approval (SSD 9522), and was included within the Specialist Consultant Studies Compendium that accompanied the EIS. The ACHA followed a previous archaeological survey of the study area (excluding Lot X DP 421633) undertaken by Biosis in 2018 (Biosis, 2018). Biosis also completed an Historical Heritage Assessment and Statement of Heritage Impact (HHA) for the project (Biosis, 2020d).

The proposed development is for an industrial estate that will include earthworks and the development of industrial infrastructure. The study area will be subdivided into lots of 1 to 3 hectares and access to the new industrial estate will be provided via the new Southern Link Road, Bakers Lane, and from a new estate access road off Mamre Road, within the southern portion of the study area.

This CHMP has been prepared for Frasers Property Industrial to address the management of Aboriginal sites located within the 657-769 Mamre Road, Kemps Creek development area. This CHMP also addresses the procedures to be followed in the event any non-Aboriginal heritage items are uncovered during construction works.

The Aboriginal community has been consulted regarding the heritage management of the project throughout its lifespan, including the heritage management provisions set out in this CHMP. Consultation has been undertaken as per the process outlined in the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW, 2010a) (consultation requirements). The recommendations of the Aboriginal community have been incorporated into this CHMP.



### 1.1.1 Biosis 2018 assessment

Biosis completed an archaeological survey report for the Mamre South Precinct development area for Altis Property Partners and Frasers Property Industrial Constructions in order to identify Aboriginal sites or areas of archaeological potential present within the study area. A search of the AHIMS database identified three AHIMS sites within the study area; EPTA3 (AHIMS 45-5-3028), EPTA10 (AHIMS 45-5-3032), and EPTA11 (AHIMS 45-5-3033). As part of the field survey these site locations were inspected in an attempt to relocate the Aboriginal heritage items. No evidence of the three AHIMS sites was located. A total of four previously unrecorded Aboriginal sites were recorded during the survey, including three artefact scatters and an isolated artefact MSP-01 (AHIMS 45-5-5187), MSP-02 (AHIMS 45-5-5188), MSP-03 (AHIMS 45-5-5189), and MSP-04 (AHIMS 45-5-5190). Silcrete was the dominant raw material among the artefacts identified within the area surveyed. Three of the four sites are located within the current study area MSP-01 (AHIMS 45-5-5187), MSP-02 (AHIMS 45-5-5188) and MSP-03 (AHIMS 45-5-5189). Another site, MSP-04 (AHIMS 45-5-5190) was located during the survey, but this is south of the current study area. An extensive area of high archaeological potential was identified adjacent to the extent of South Creek, within the western portion of the study area. Two additional areas of moderate archaeological potential were also identified upon highpoints within the eastern portion of the study area. A large central portion of the SSD application area (Lot X DP 421633) was un-surveyable due to access restrictions. This portion of the SSD application area was surveyed as part of the 2019 investigation.

### 1.1.2 Biosis 2020 assessment

Biosis undertook an ACHA within the Mamre South Precinct development area in 2018/2019. The field investigations comprised both a survey of Lot X DP 421633, and a program of test excavations. The test excavations were undertaken following the recommendations of the survey undertaken in 2018 (Biosis, 2018). The overall effectiveness of the field survey in Lot X DP 421633 was deemed low due to minimal ground surface visibility and no new Aboriginal sites or areas of potential were identified.

Following the survey of the study area, test excavations were undertaken in areas of potential identified by Biosis in 2018. The test excavations located sub-surface deposits in all three areas of potential. OA1 and OA2 were located the furthest distance from water and both contained low density artefact deposits, while a high density artefact deposit was identified at OA3 which is located closer to South Creek. The assemblage at OA3 contained a varied artefact deposit including a number of backed artefacts which placed it within the Middle Bondaian phase of occupation, approximately 4,000 to 1,000 years before present.

## 1.2 Development Overview

The Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (the Yards) is a regional warehouse and distribution complex located at Kemps Creek within the Penrith local government area (LGA) within the Western Sydney Employment Area (WSEA) (see Figure 1).

Frasers Property Australia Pty Ltd (Frasers) and Altis Bulky Retail Pty Ltd (Altis) jointly identified as 'the Proponent' obtained Development Consent SSD (State Significant Development) 9522 on 21 December 2020 from the Department of Planning, Industry and Environment (DPIE) for the '*Kemps Creek Warehouse, Logistics and Industrial Facilities Hub*' comprising the construction of eight warehouse buildings over eight lots as the first stage of development, with estate works across the broader site comprising bulk earthworks to create building pads for future development, stormwater infrastructure and an internal road network including a north south distributor road connecting to the adjacent property, intersection upgrades and the widening of Mamre Road.

Specifically, SSD 9522 permits the following development:



- *Demolition of existing structures, site-wide earthworks, landscaping, stormwater and other infrastructure and an internal road network;*
- *Construction and operation of eight warehouses comprising 162,355 m<sup>2</sup> of floor space;*
- *Intersection upgrade works in Mamre Road;*
- *744 parking spaces; and*
- *21-lot Torrens title subdivision over two stages, being Stage 1 residual lot subdivision (5 lots) and Stage 2 residual and development lot subdivision (17 lots).*

### **1.3 Construction Staging and Activities**

The Stage 1 development of the Yards comprises the subdivision of five lots within the site, along with demolition and site wide earthworks, landscaping, utilities, stormwater and the internal road networks. Stage 1 also includes the construction and operation of eight warehouses inclusive of 744 parking spaces and intersection upgrade works on Mamre Road.

The Stage 2 development comprises the subdivision of the remaining portion of the site into a further 17 lots.

Development on these lots is then anticipated to occur over a period of time to meet market demand and would be subject to future development applications.

### **1.4 Location**

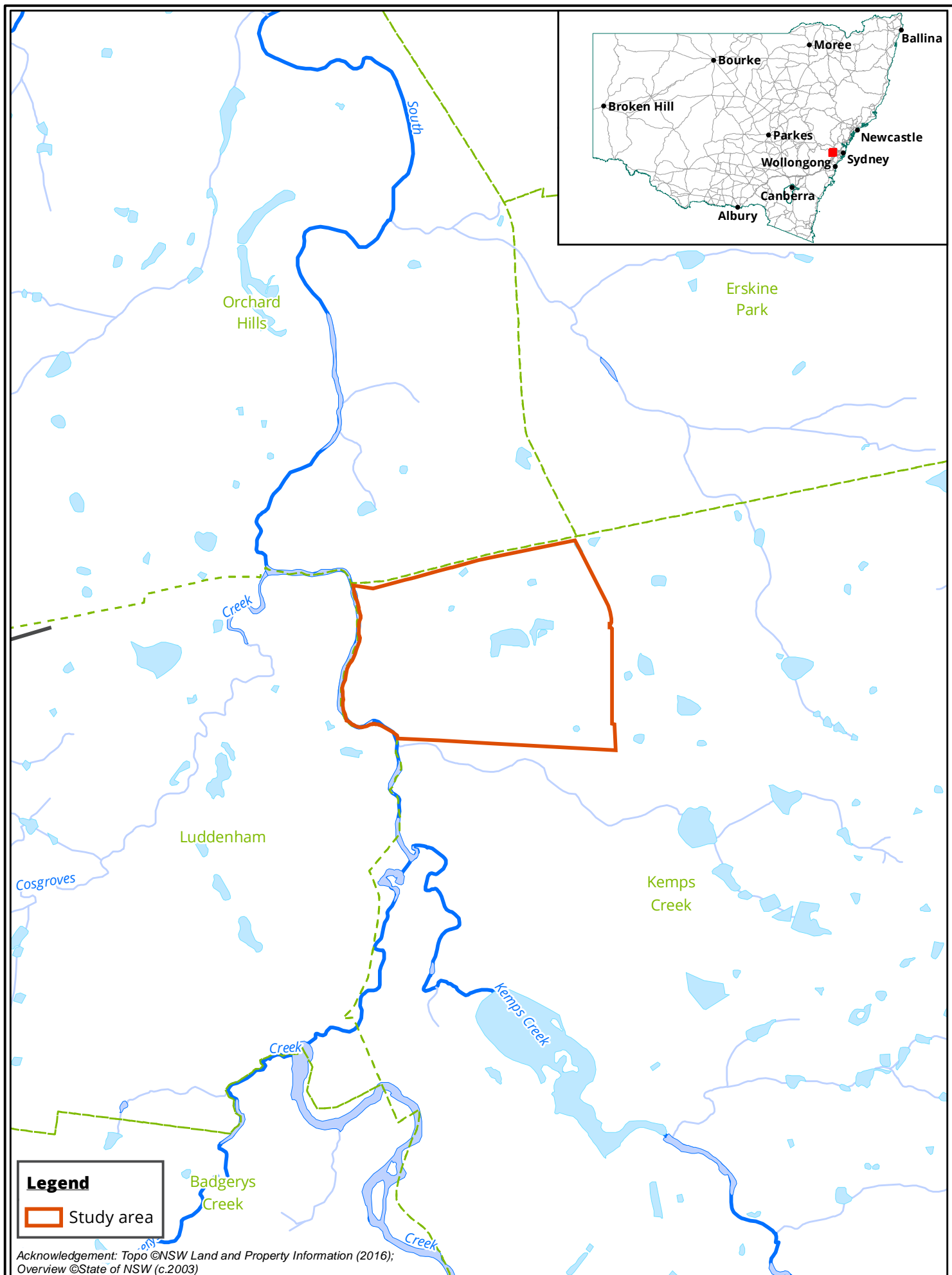
The Yards is located at 657-769 Mamre Road, Kemps Creek and is legally described as Lot 34 DP 1118173, Lot X DP 421633, Lot 1 DP 1018318, Lot Y DP 421633 & Lot 22 DP 258414. It is located at the western extent of the WSEA within the Penrith LGA.

The site is bound by the following land uses:

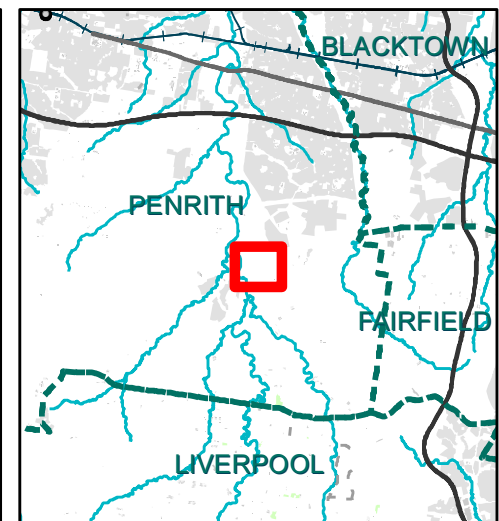
- North – the Water NSW Pipeline and SSD 7173 approved 'First Estate' industrial development, with the Erskine Business Park beyond
- South – rural residential properties
- East – Mamre Road with rural residential properties, schools and age care beyond
- West – South Creek with rural residential properties beyond.

The site has historically been used for low intensity agriculture and is primarily covered with pasture grass and limited stands of vegetation. The site has several dams in the central area and has a gradual fall from east to west towards South Creek.









#### Legend

- Study area
- Lot

**Figure 2 Study area detail**

0 50 100 150 200 250  
Metres

Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Albury, Ballarat, Melbourne,  
Newcastle, Sydney, Wangaratta & Wollongong

Matter: 34009  
Date: 16 October 2020  
Checked by: MT, Drawn by: SSK, Last edited by: skumar  
Location: P:\34000s\34009\Mapping\34009\_F2\_StudyArea







## 1.5 Purpose and objectives

The purpose of this CHMP is to describe how Aboriginal and non-Aboriginal heritage will be protected and managed by Frasers Property Industrial during the operational life of the project. In accordance with B59 of the CoC, the CHMP forms part of the project's CEMP and should be read in conjunction with that document.

The key objective of the CHMP is to ensure that impacts to Aboriginal and non-Aboriginal heritage are minimised and within the scope permitted by the Project Approval. Specific objectives include:

- Updated baseline mapping of the Aboriginal and non-Aboriginal heritage items within and adjoining the operational study area.
- A description of the measures that would be implemented for:
  - Managing the discovery of human remains or previously unidentified heritage items.
  - Conducting further archaeological and heritage assessment in any disturbance areas where this assessment has not already been carried out.
  - Ensuring any workers on site receive suitable heritage inductions prior to carrying out any work on site.

The CHMP must include a description of the measures for the management of Aboriginal heritage that would be implemented to:

- Protect the heritage items outside the project disturbance area.
- Minimise and manage the impacts of the project on heritage items within the disturbance area, including:
  - Any proposed archaeological investigations and/or salvage measures.
  - A strategy for the long-term management of any items or material that are collected during any of these archaeological works.
- Monitor and report on the effectiveness of any mitigation measures and any heritage impacts of the project.
- Maintain and manage reasonable access for registered Aboriginal parties (RAPs) to heritage items on site.
- Provide for ongoing consultation with RAPs in the conservation and management of Aboriginal cultural heritage on site.
- Monitor and report on the effectiveness of these measures and any heritage impacts of the project.

The CHMP must also include a description of the measures that would be implemented for the management of unexpected non-Aboriginal heritage finds.

This CHMP should be read in conjunction with the following documents:

- *Mamre South State Significant Development Application Archaeological Survey Report* (Biosis, 2018). *Report for Frasers Property Industrial Constructions Pty Ltd and Altis Property Partners Pty Ltd.*
- *Mamre South Precinct State Significant Development: Aboriginal Cultural Heritage Assessment* (Biosis, 2020a) (Biosis 2020a). *Report for Altis Property Partners and Frasers Property Industrial Construction.*



- *Mamre South Precinct State Significant Development: Archaeological Report* (Biosis, 2020c). *Report for Altis Property Partners and Frasers Property Industrial Construction.*
- *Mamre South State Significant Development Application Statement of Heritage Impact* (Biosis, 2020d). *Report for Frasers Property Industrial Constructions Pty Ltd and Altis Property Partners Pty Ltd.*

## 1.6 Heritage Management Conditions

The conditions relating to Aboriginal and non-Aboriginal heritage and where they have been addressed within this document are described below in Table 1.

**Table 1 Conditions of Consent – Aboriginal and Historical Heritage**

Condition	Description	Location within CHMP
<b>B56</b>	Before the commencement of any clearing, ground disturbing works or construction works, Aboriginal Site Impact Recording Forms for MSP-01, MSP-02 and MSP-03 must be submitted for inclusion on the Aboriginal Heritage Information Management System database. The Aboriginal Site Impact Recording Forms must be completed by a suitably qualified archaeologist and show the total count of the artefacts identified at each site.	Section 5.1.7.2 and 5.1.7.3
<b>B57</b>	Before the commencement of any clearing, ground disturbing works or construction works, Aboriginal Heritage Information Management System site cards must be prepared for MSP-05, MSP-06, MSP-07, MSP-08, MSP-09, MSP-10 and MSP-11 and submitted for registration in the Aboriginal Heritage Information Management System database.	Appendix F
<b>B58</b>	Should any Aboriginal objects be salvaged, the Applicant must complete and submit an Aboriginal Site Impact Recording Form for inclusion on the Aboriginal Heritage Information Management System database.	Section 5.1.7.2 and 5.1.7.3
<b>B59</b>	Before the commencement of any clearing, ground disturbing works or construction works, the Applicant must prepare an Aboriginal Cultural Heritage Management Plan (CHMP) for the development to protect and manage Aboriginal heritage within the site. The plan must form part of the CEMP required by condition C2 and must:	This document
<b>B59 (a)</b>	Be prepared by a suitably qualified and experienced expert in consultation with the Registered Aboriginal Parties and Heritage NSW	Appendix C and Appendix D
<b>B59 (b)</b>	Be submitted to the satisfaction of the Planning Secretary prior to construction of any part of the development.	
<b>B59 (c)</b>	Address the recommendations within the Aboriginal Cultural Heritage Assessment Report prepared by Biosis dated 31 July 2020.	Section 5
<b>B59 (d)</b>	Include a salvage program for Aboriginal objects, including long-term care and control.	Sections 5.1.7.2, 5.1.7.3, 5.1.8, and 5.1.9
<b>B59 (e)</b>	Include detailed procedures for the long-term management of Aboriginal site MSP-11	Sections 5.1.9, 5.1.11 and 5.1.12



Condition	Description	Location within CHMP
<b>B59 (f)</b>	Include a care agreement for Aboriginal objects, including details of a temporary storage location endorsed by Registered Aboriginal Parties.	Section 5.1.7.2, 5.1.7.3, 5.1.10, Appendix D
<b>B60</b>	The Applicant must: <ul style="list-style-type: none"> <li>Not commence construction until the Aboriginal Cultural Heritage Management Plan is approved by the Planning Secretary.</li> <li>Implement the most recent version of the Aboriginal Cultural Heritage Management Plan approved by the Planning Secretary for the duration of the development.</li> </ul>	N/A
<b>B61</b>	Following the removal of vegetation on Lot X DP 421633, the Applicant must conduct an archaeological re-survey with Registered Aboriginal Parties of Lot X DP 421633 to confirm the findings of the Aboriginal Cultural Heritage Assessment Report prepared by Biosis dated 31 July 2020. Any Aboriginal objects or sites identified during the resurvey will need to be managed in accordance with the protocols for newly identified sites in the CHMP required under condition B59.	Appendix G
<b>B62</b>	If any item or object of Aboriginal heritage significance is identified on site: <ul style="list-style-type: none"> <li>All work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately.</li> <li>A 10 m wide buffer area around the suspected item or object must be cordoned off.</li> <li>Heritage NSW must be contacted immediately.</li> </ul>	Section 5.1.13 Appendix E
<b>B63</b>	Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the <i>National Parks and Wildlife Act 1974</i> .	Section 5.1.13 Appendix E
<b>B64</b>	If any archaeological relics are uncovered during the course of the work, then all works must cease immediately in that area. Unexpected finds must be evaluated and recorded in accordance with the requirements of Heritage NSW, Department of Premier and Cabinet.	Section 5.1.14

## 1.7 Contributors

This CHMP was prepared by Dr Amanda Markham, Senior Archaeologist at Biosis Pty Ltd. This report has been reviewed by Taryn Gooley, Team Leader NSW - Heritage and Samantha Keats, Senior Archaeologist, at Biosis Pty Ltd.



## 2 Environmental requirements

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The following section outlines the environmental requirements of the project including relevant legislation and guidelines that have been used to assist in the formulation of this CHMP.

### 2.1 Relevant legislation and guidelines

Legislation relevant to heritage management includes:

- *Environmental Planning and Assessment Act 1979* (EP&A Act).
- *National Parks and Wildlife Act 1974* (NPW Act).
- *Heritage Act 1977*.

The main guidelines, specifications and policy documents relevant to this CHMP include:

- Australia ICOMOS (2013). *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance*, Australia ICOMOS, Burwood, VIC.
- DECCW (2010a). *Aboriginal Cultural Heritage Consultation Requirements for Proponents*, Department of Environment and Climate Change, Sydney NSW (consultation requirements).
- DECCW (2010b). *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment and Climate Change, Sydney NSW (the Code).
- Heritage Office & Department of Planning (2009). *Historical Archaeology Code of Practice*.
- OEH (2011). *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

### 2.2 Commitment to Aboriginal cultural heritage preservation

Aboriginal people have inhabited the Australian continent for the last 50,000 years and the NSW area for over 42,000 years (Allen and O'Connell, 2003; Bowler *et al.*, 2003). These dates are subject to continued revision as further evidence of Aboriginal cultural heritage is discovered and as more research of this evidence is conducted.

Without being part of the Aboriginal culture, and the productions of this culture, it is not possible for non-Aboriginal people to fully understand their meaning to Aboriginal people – only to move closer towards understanding this meaning with the help of the Aboriginal community. Similarly, definitions of Aboriginal culture and cultural heritage without this involvement constitute outsider interpretations.

With this preface, Aboriginal cultural heritage broadly refers to things that relate to Aboriginal culture and hold cultural meaning and significance to Aboriginal people (DECCW, 2010a). There is an understanding in Aboriginal culture that everything is interconnected. In essence, Aboriginal cultural heritage can be viewed as potentially encompassing any part of the physical and/or mental landscape, that is, 'Country' (DECCW, 2010a).



Aboriginal people's interpretation of cultural value is based on their 'traditions, observance, lore, customs, beliefs and history' (DECCW, 2010a). The things associated with Aboriginal cultural heritage are continually and actively being defined by Aboriginal people (DECCW, 2010a). These things can be associated with traditional, historical or contemporary Aboriginal culture (DECCW, 2010a).

### 2.2.1 Tangible Aboriginal cultural heritage

Three categories of tangible Aboriginal cultural heritage may be defined as:

- Things that have been observably modified by Aboriginal people.
- Things that may have been modified by Aboriginal people but no discernible traces of that activity remain.
- Things never physically modified by Aboriginal people (but associated with Dreamtime Ancestors who shaped those things).

### 2.2.2 Intangible Aboriginal cultural heritage

Examples of intangible Aboriginal cultural heritage would include memories of stories and 'ways of doing', which would include language and ceremonies (DECCW, 2010a).

### 2.2.3 Statutory

Currently Aboriginal cultural heritage, as statutorily defined by the NPW Act, consists of objects and places.

Aboriginal objects are defined as:

*'any deposit, object or material evidence...relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.'*

Aboriginal places are defined as a place that is or was of special Aboriginal cultural significance. Places are declared under Section 84 of the NPW Act.

### 2.2.4 Values

Aboriginal cultural heritage is broadly valued by Aboriginal people as it is used to define their identity as both individuals and as part of a group (DECCW, 2010a)). More specifically it is used:

- To provide a:
  - 'Connection and sense of belonging to Country' (DECCW, 2010a).
  - Link between the present and the past (DECCW, 2010a).
- As a learning tool to teach Aboriginal culture to younger Aboriginal generations and the general public (DECCW, 2010a).
- As further evidence of Aboriginal occupation prior to European settlement for people who do not understand the magnitude to which Aboriginal people occupied the continent (see also (DECCW, 2010a)).

The NSW government and all of its entities are committed the protection and preservation of Aboriginal and non-Aboriginal cultural heritage in NSW and on the Mamre South Precinct development site.



## 3 Existing environment

The following sections summarise what is known about Aboriginal and non-Aboriginal heritage within and adjacent to the study area based on information provided in:

- *Mamre South State Significant Development Application Archaeological Survey Report* (Biosis, 2018). *Report for Frasers Property Industrial Constructions Pty Ltd and Altis Property Partners Pty Ltd.*
- *Mamre South Precinct State Significant Development: Aboriginal Cultural Heritage Assessment* (Biosis, 2020a) (Biosis 2020a). *Report for Altis Property Partners and Frasers Property Industrial Construction.*
- *Mamre South Precinct State Significant Development: Archaeological Report* (Biosis, 2020c). *Report for Altis Property Partners and Frasers Property Industrial Construction.*
- *Mamre South State Significant Development Application Statement of Heritage Impact* (Biosis, 2020d). *Report for Frasers Property Industrial Constructions Pty Ltd and Altis Property Partners Pty Ltd.*

### 3.1 Aboriginal cultural heritage

Aboriginal cultural heritage values were subject to assessment through the following processes:

- Literature and database review
- Archaeological survey
- Archaeological test excavations
- Aboriginal community consultation
- Assessment of significance and proposed impacts

Based upon these tasks, 13 Aboriginal heritage sites associated with the project have been identified, these are detailed in Table 2 and their locations are identified in Figure 4. All Aboriginal heritage sites have been recorded in accordance with the Code, submitted to Heritage NSW and listed within the AHIMS database.

**Table 2 Aboriginal heritage sites associated with the project**

AHIMS No.	Site	Description	Significance
45-5-5187	MSP-01	Artefact	Low
45-5-5188	MSP-02	High density sub-surface artefact scatter	High
45-5-5189	MSP-03	Low density sub-surface artefact scatter	Low
45-5-5340	MSP-05	Low density sub-surface artefact scatter	Low
45-5-5341	MSP-06	Low density sub-surface artefact scatter	Low
45-5-5342	MSP-07	Artefact	Low
45-5-5343	MSP-08	Artefact	Low
45-5-5344	MSP-09	Low density sub-surface artefact scatter	Low
45-5-5345	MSP-10	Low density sub-surface artefact scatter	Low
45-5-5346	MSP-11	Low density sub-surface artefact scatter	Low



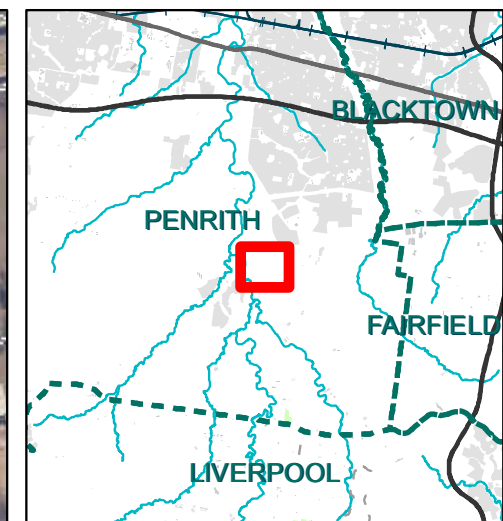
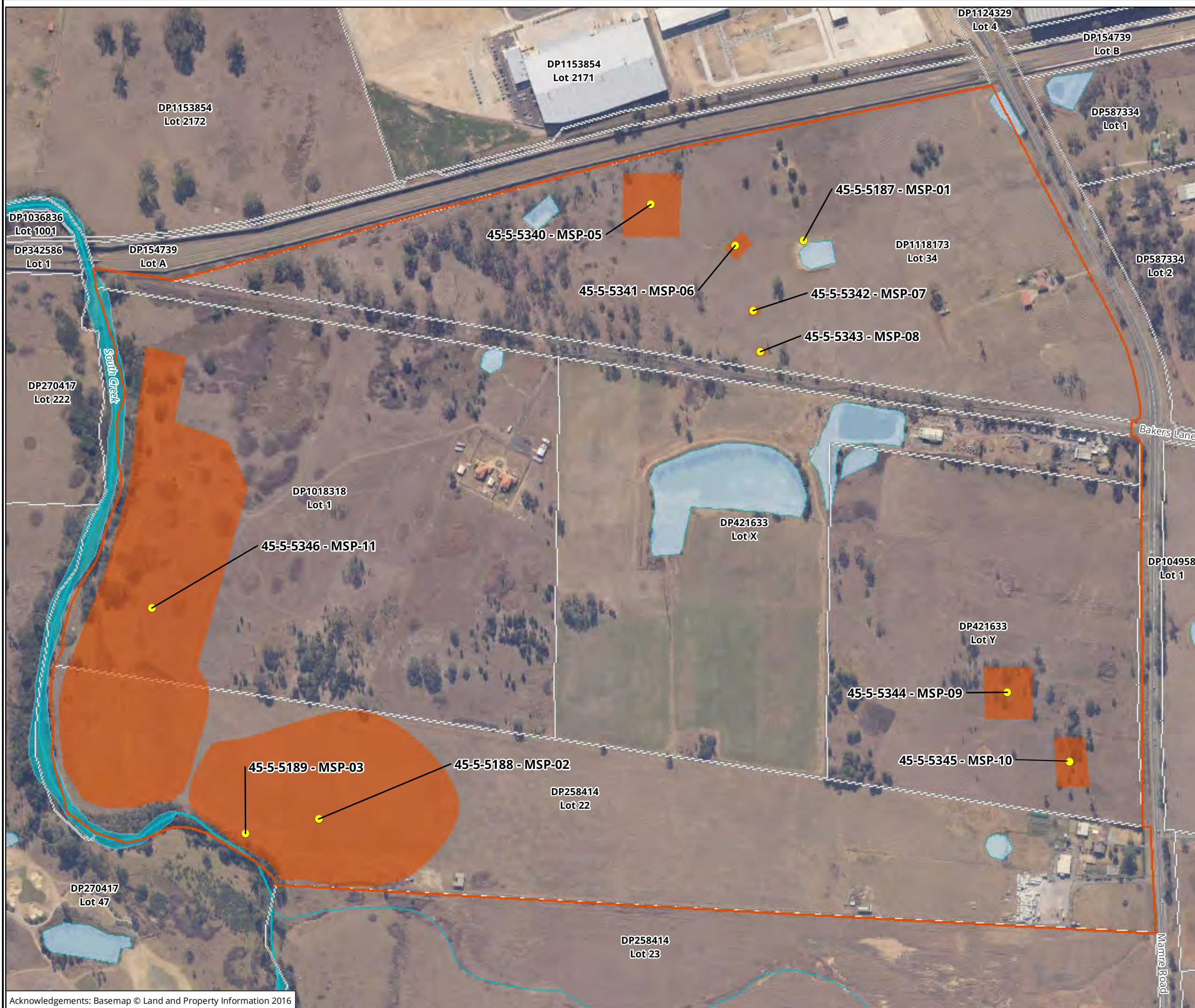
### **3.2 Non-Aboriginal heritage**

The assessment of non-Aboriginal heritage values within the study area was undertaken through the completion of the following tasks (Biosis, 2020d):

- Literature and database review
- Archaeological survey
- Assessment of proposed impacts

There are no non-Aboriginal heritage sites located within the project area.





#### Legend

- Study area
- Lot
- Aboriginal heritage sites
- AHIMS

**Figure 4 Location of heritage sites and no-go areas**

0 40 80 120 160 200

Metres

Scale: 1:4,500 @ A3

Coordinate System: GDA 1994 MGA Zone 56



Albury, Ballarat, Melbourne,  
Newcastle, Sydney, Wangaratta & Wollongong

Matter: 34009  
Date: 03 November 2020,  
Checked by: MT, Drawn by: SSK, Last edited by: Iharley  
Location: P:\34000s\34009\Mapping\34009\_F4\_Heritage\_Zoom



## 4 Environmental aspects and impacts

The key construction activities and the associated potential impacts to heritage values (both Aboriginal and non-Aboriginal) were identified through a risk management approach. The consequence and likelihood of each activity's impact on the environment was assessed to prioritise its significance.

### 4.1 Aboriginal heritage impacts

The potential impacts on Aboriginal heritage recordings include:

- Direct impacts and disturbance to the entire site or the majority of a site containing Aboriginal objects due to the construction of the project, this can be complete or partial.
- Indirect impacts to Aboriginal objects or cultural values, such as from development related changes to the landscape or scenic context of a site or item.

Impacts to Aboriginal heritage sites as outlined in:

- *Mamre South State Significant Development Application Archaeological Survey Report* (Biosis, 2018). *Report for Frasers Property Industrial Constructions Pty Ltd and Altis Property Partners Pty Ltd.*
- *Mamre South Precinct State Significant Development: Aboriginal Cultural Heritage Assessment* (Biosis, 2020a) (Biosis 2020a). *Report for Altis Property Partners and Frasers Property Industrial Construction.*
- *Mamre South Precinct State Significant Development: Archaeological Report* (Biosis, 2020c). *Report for Altis Property Partners and Frasers Property Industrial Construction.*
- *Mamre South State Significant Development Application Statement of Heritage Impact* (Biosis, 2020d). *Report for Frasers Property Industrial Constructions Pty Ltd and Altis Property Partners Pty Ltd.*

### 4.2 Heritage Management Plan conditions

Impacts to Aboriginal heritage sites are summarised in Table 3.

**Table 3 Impacts to Aboriginal heritage sites**

AHIMS site no.	Site name	Significance	Type of harm	Degree of harm	Consequence of harm
45-5-5187	MSP-01	Artefact	Direct	Total	Total loss of value
45-5-5188	MSP-02	High density sub-surface artefact scatter	Direct	Total	Total loss of value
45-5-5189	MSP-03	Low density sub-surface artefact scatter	Direct	Total	Total loss of value
45-5-5340	MSP-05	Low density sub-surface artefact scatter	Direct	Total	Total loss of value
45-5-5341	MSP-06	Low density sub-surface artefact scatter	Direct	Total	Total loss of value



AHIMS site no.	Site name	Significance	Type of harm	Degree of harm	Consequence of harm
<b>45-5-5342</b>	MSP-07	Artefact	Direct	Total	Total loss of value
<b>45-5-5343</b>	MSP-08	Artefact	Direct	Total	Total loss of value
<b>45-5-5344</b>	MSP-09	Low density sub-surface artefact scatter	Direct	Total	Total loss of value
<b>45-5-5345</b>	MSP-10	Low density sub-surface artefact scatter	Direct	Total	Total loss of value
<b>45-5-5346</b>	MSP-11	Low density sub-surface artefact scatter	Direct	Partial	Partial loss of value

In the event that additional disturbance is anticipated to occur outside of the areas explicitly surveyed in *Mamre South State Significant Development Application Archaeological Survey Report* (Biosis, 2018) and *Mamre South Precinct State Significant Development: Archaeological Report* (Biosis, 2020b), then these disturbances will need to undergo additional heritage assessment and impact mitigation processes prior to the commencement of any associated works. It is likely that any additional impacts outside of the areas surveyed in Biosis 2018 and Biosis 2020 would need to be assessed as a modification to the existing approval.



## 5 Environmental mitigation measures

### 5.1 Operational related measures

Specific mitigation measures to address impacts on Aboriginal and non-Aboriginal heritage are outlined in Table 4. Where required, further details of the proposed mitigation measures are provided in Section 5.1

**Table 4 Operational related measures**

Strategy	Requirement	Personnel
1	Contingency plan to follow in the event of the discovery of human remains.	Project Manager/ Construction contractor
2	Procedure to follow for conducting further archaeological and heritage assessments in any disturbance areas where assessment has not been carried out.	Project Manager/ Archaeologist/ Aboriginal Community
3	Heritage Induction for all employees, contractors and sub-contractors.	Project Manager/ Archaeologist
4	Contingency plan for impact to Aboriginal heritage sites outside of the development area.	Project manager
5	Contingency plan if Aboriginal heritage items outside the approved disturbance area are damaged.	Project manager
6	Procedure to protect Aboriginal heritage sites within the project disturbance area not subject to salvage or harm.	Project Manager/ Archaeologist
7	Procedure for undertaking additional archaeological investigations and/or salvage measures.	Project Manager/ Archaeologist/ Aboriginal Community
8	A strategy for mitigating impacts during development works be prepared for Aboriginal site #45-5-5346 (MSP-11)	Project Manager/ Construction contractor
9	A strategy for the long-term management of Aboriginal site #45-5-5346 (MSP-11)	Project Manager/ Construction contractor/ Aboriginal community
10	Long term management of Aboriginal heritage items	Project manager/ Archaeologist/ Aboriginal community
11	Maintaining and managing reasonable access for RAPs to Aboriginal heritage items located within the study area throughout the operational life of the project.	Project manager/ Aboriginal community
12	Ongoing consultation with RAPs regarding the management and conservation of Aboriginal cultural heritage throughout the operational life of the project	Project manager/ Archaeologist/ Aboriginal community



Strategy	Requirement	Personnel
13	Contingency plan to follow in the event of unexpected Aboriginal finds.	Project Manager/ Construction contractor
14	Contingency plan to follow in the event of unexpected non-Aboriginal finds.	Project Manager/ Construction contractor

### 5.1.1 Strategy 1: Contingency plan to follow in the event of the discovery of human remains

If any suspected human remains are discovered within the study area, all activity must cease. The following contingency plan must be undertaken:

- Immediately cease all work at that location and not further move or disturb the remains.
- Notify the NSW Police, and the NSW Environment Line on 131 555 as soon as practicable and provide details of the remains and their location.
- Establish an appropriate no-go area. This will need to be established in consultation with NSW Police, Heritage NSW and if necessary, a qualified archaeologist.
- Works will not be able to recommence within the location of the find until confirmation from NSW Police and Heritage NSW is obtained. If the remains are confirmed as not being human then works may recommence. In the event that remains are human then consultation with NSW Police, Heritage NSW and the RAPs to establish a plan of management must be undertaken.
- Works in the vicinity of the find will only be able to commence once the plan of management has been established and approval has been obtained from all relevant parties.
- Should any human remains be identified, this will trigger a review of this CHMP in accordance with Section 8.

### 5.1.2 Strategy 2: Procedure to follow for conducting further archaeological and heritage assessments in any disturbance areas where assessment has not been carried out

For any new works in previously undisturbed areas outside those investigated in *Mamre South State Significant Development Application Archaeological Survey Report* (Biosis, 2018), *Mamre South Precinct State Significant Development: Aboriginal Cultural Heritage Assessment* (Biosis, 2020a), *Mamre South Precinct State Significant Development: Archaeological Report* (Biosis, 2020b), and *Mamre South State Significant Development Application Statement of Heritage Impact* (Biosis, 2020d) both an ACHA and Historic Heritage Assessment (HHA) must be undertaken.

An ACHA must be prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011). This includes an Archaeological Report prepared in accordance with the Code and consultation with Aboriginal community in accordance with the consultation requirements.

A HHA must be prepared in accordance with current heritage guidelines including *Assessing Heritage Significance, Assessing Significance for Historical Archaeological Sites and 'Relics'* (NSW Heritage Branch, Department of Planning, 2009) and the *Burra Charter* (Australia ICOMOS, 2013).



### **5.1.3 Strategy 3: Heritage inductions for all employees, contractors and sub-contractors working in the study area**

All employees, contractors, and sub-contractors must undertake a heritage induction as part of a site induction prior to commencement of any duties within the study area. Further details of a heritage induction package have been provided in Section 7 and Appendix A of this CHMP.

### **5.1.4 Strategy 4: Procedure to protect Aboriginal heritage sites outside the project disturbance area**

Frasers Property should establish a limit of works to protect Aboriginal heritage sites outside the project disturbance area.

Where appropriate, the boundaries of Aboriginal heritage sites that are located outside of, but in close proximity to, the project disturbance area will be clearly marked with star pickets/pegs and high visibility flagging tape to ensure that no impacts can occur to these sites. In addition, all employees, contractors and sub-contractors shall:

- Be made aware of the locations of these sites during site induction.
- Seek permission to travel across areas outside of the disturbance areas from the Site Manager.
- Be provided access to maps, with a description of the site and site coordinates as needed.

Where sites cannot be identified or located, advice shall be sought from the project archaeologist.

### **5.1.5 Strategy 5: Contingency plan if Aboriginal heritage items outside the approved disturbance area are damaged**

In the event that Aboriginal heritage items outside of the approved disturbance area are damaged, Frasers Property Industrial must notify Heritage NSW immediately. Heritage NSW should be contacted through Environment Line on 131 555 as soon practical. An appropriate no-go zone should be established until the area can be inspected and advice sought from Heritage NSW on how to proceed.

### **5.1.6 Strategy 6: Procedure to protect Aboriginal heritage sites within the project disturbance area not subject to salvage or harm in Section 5.1.7**

The boundaries of all Aboriginal heritage sites that are located within the project disturbance area but not subject to salvage or harm (as outlined in Section 5.1.7 below) will be:

- Clearly marked with star pickets or pegs and high visibility flagging tape to ensure that no impacts can occur to these sites.
- Included in site heritage inductions.
- Clearly marked on maps, with a description of the site and site coordinates available to all employees, contractors and sub-contractors as needed.

Where sites cannot be identified or located, advice shall be sought from the project archaeologist.

### **5.1.7 Strategy 7: Procedure for undertaking additional archaeological investigations and/or salvage measures**

Any additional archaeological investigations must take place in accordance with the Code and in consultation with the Aboriginal community in accordance with the consultation requirements.



#### **5.1.7.1 Re-survey of Lot X DP421633**

Lot X DP421633 requires re-survey with the RAPs in order to adequately identify and assess the impacts of the proposal on Aboriginal cultural heritage potentially present in Lot X DP421633. Prior to the survey of Lot X DP421633, vegetation removal in the form of slashing, mowing or harvesting will be undertaken to enable survey access.

Any Aboriginal objects or sites identified during the re-survey will need to be managed in accordance with the protocols for newly identified sites set out in section 5.1.13, and the Code. This must be done in consultation with the RAPs in accordance with the consultation requirements.

#### **5.1.7.2 Test excavations**

Should test excavations be required, they will conform to the following methodology.

- Test excavations will be conducted in 50 x 50 centimetre units.
- A series of 50 x 50 centimetre test excavation pits will be excavated in the areas of proposed impact spaced at 20 metre, 10 metre or other suitable intervals, in order to determine the nature and presence of any possible sub-surface deposit.
- All test excavation points will be separated by a minimum of 5 metres.
- Should test excavation units need to be combined to gain a greater understanding the site characteristics, the maximum continuous surface area at a single excavation point shall not exceed 3 metres squared.
- The maximum surface area of all test excavation units must be no greater than 0.5% of the area – either PAD or site – being investigated. Note this does not apply if the 50cm x 50cm excavation unit is greater than 0.5% of the site or PAD being investigated.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools).
- The first test pit within a site or PAD area will be excavated in 5 centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units.
- All material excavated from the test excavation units must be dry sieved using 3 or 5 millimetre aperture wire-mesh sieves.
- Test excavation units must be excavated to at least the base of the identified Aboriginal object-bearing units, and must continue to confirm the soils below are culturally sterile.
- All consolidated in-situ features must be excavated to the extent of the feature. This may require extending pits.
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Biosis office for analysis (at 14/17-27 Power Ave, Alexandria, NSW).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour, texture and pH.
  - Amount and location of cultural material within the deposit.
  - Nature of disturbance where present.



- Stratigraphy.
  - Archaeological features (if present).
  - Photographic records.
  - Spit records.
- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- All faunal remains recovered from the test pits will be analysed in the field or in-situ using the following method:
  - MNI-Minimum number of individual animals represented in each discrete area and on site overall.
  - MNE-Minimum number of elements represented in each discrete area and on site overall.
  - NISP- Number of species represented in each discrete area and on site overall.
  - Dimensions of each element.
  - Butchery/heat marks.
  - Pathologies.
  - All faunal remains will be photographed in-situ to understand the relationship of the remains with other artefactual material.
- Any datable material will be collected for the purposes of radiometric or AMS dating. Datable materials will be collected, bagged and clearly labelled. They will be temporarily stored in the Biosis office at 14/17-27 Power Ave, Alexandria, NSW before being sent for analysis at reputable institutions.
- In the event that suspected human remains are identified works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present with regard to their nature and significance.
- Should a deposit be identified that requires salvage, this CHMP will be updated (specifically section 5.1.7.2) to include the site to be salvaged in the methodology. This will be completed in consultation with Heritage NSW and the RAPs.

*\*Enough information is defined by Heritage NSW as meaning “the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance. This may include things like locally or regionally high object density: presence of rare or representative objects: presence of archaeological features: or locally or regionally significant deposits stratified or not.”(DECCW, 2010b).*

### **5.1.7.3 Salvage**

The manual excavation salvage program at AHIMS #45-5-5188 (MSP-02) and #45-5-5189 (MSP-03) would be undertaken in the following manner:

- Salvage excavations will be conducted in 1 x 1 metre units.



- Salvage areas will be placed within #45-5-5188 (MSP-02) and #45-5-5189 (MSP-03) in the areas identified within the ACHA (Biosis 2020a) as having the highest artefact densities. Test pits with artefact densities above 20, as shown in Figure 5 below, will be targeted for salvage.
- The expansion of the pits within #45-5-5188 (MSP-02) and #45-5-5189 (MSP-03) will be undertaken on a case by case basis in order to identify and salvage as large a volume of cultural material as possible.
- No more than a combined 100 metres squared will be excavated within #45-5-5188 (MSP-02) and #45-5-5189 (MSP-03).
- Should a significant feature, or significantly high density deposits be identified beyond the 100 metre squared area specified in the point above, additional manual excavation may be undertaken outside of the 100 metre squared area. This excavation will be conducted in consultation with Heritage NSW and the RAP representatives on site.
- Salvage excavations will be conducted by hand (inclusive of trowels, spades and other hand tools). Manual excavations will be conducted in 10 centimetre spits to the base of Aboriginal object-bearing soils identified during the test excavation program.
- All soil excavated during manual excavations will be sieved in 5 or 3 millimetre sieves as appropriate. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
- Shoring or other stabilisation methods may be utilised as required in order to allow for the safe excavation of soils in line with WHS standards.
- The open area may be expanded as required to allow for benching or other stabilisation methods in order to allow for the safe excavation of soils in line with WHS standards.
- All cultural material recovered from the pits will be collected and brought to the Biosis Sydney office at 14/17-27 Power Ave, Alexandria NSW 2015 for analysis.
- The excavation unit will be temporarily fenced with para webbing and star pickets to be backfilled in a controlled manner as part of the proposed development as soon as practicable following completion of the salvage works.
- Any datable material will be collected for the purposes of radiometric, AMS or OSL dating. Datable materials will be collected, bagged and clearly labelled accordingly. They will be temporarily stored in the Biosis office at 14/17-27 Power Ave, Alexandria NSW 2015 before being sent off for analysis at reputable institutions.
- Following the salvage excavations, an AHIMS Aboriginal Site Recording form must be completed and submitted to the AHIMS Registrar as soon as practicable, for #45-5-5188 (MSP-02) and #45-5-5189 (MSP-03).

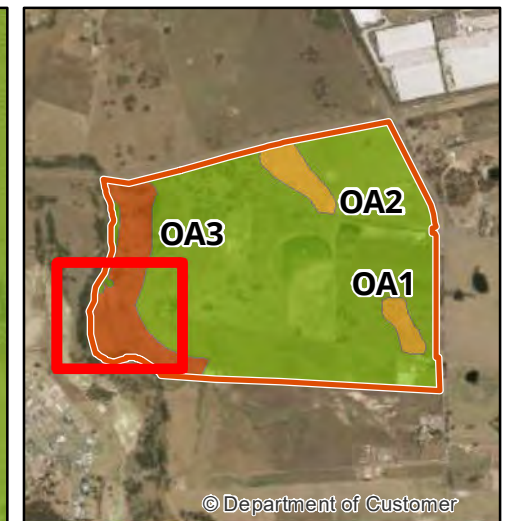
### **Mechanical excavations (MSP 02 and MSP 03)**

- Mechanical excavation may be undertaken once manual (hand excavations) have been completed. Mechanical excavation may not replace manual excavation and should only be undertaken once comprehensive manual (hand excavations) salvage of AHIMS sites #45-5-5188 and #45-5-5189 has been completed. Grader scrapes will be undertaken as per the methodology set out in Strategy 8.
- Mechanical excavations will be undertaken in consultation with RAPs and where lower density artefact deposits have been identified outside of hand excavation areas to further characterise the extent and nature of sites.



- Collection of Aboriginal objects during monitoring of mechanical excavation should follow the protocols for surface collection of artefacts outlined in Section 5.1.7.4 below.





#### Legend

Study area

#### Number of artefacts

- 0
- 1 - 10
- 11 - 20
- 21 - 30
- 31 - 35

#### PAD

#### Archaeological potential

- High
- Low

**Figure 5.1: Salvage areas within #45-5-5188 (MSP-02) and #45-5-5189 (MSP-03)**

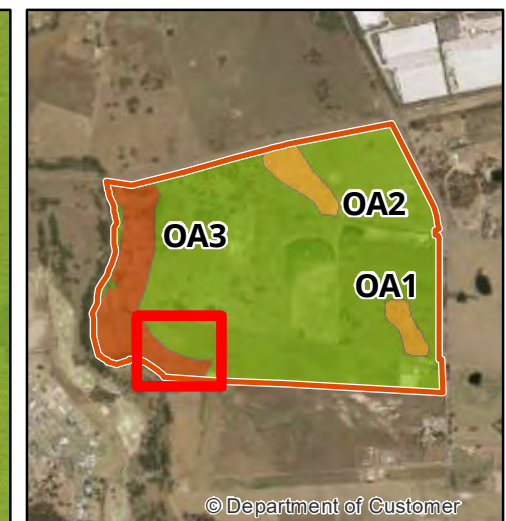
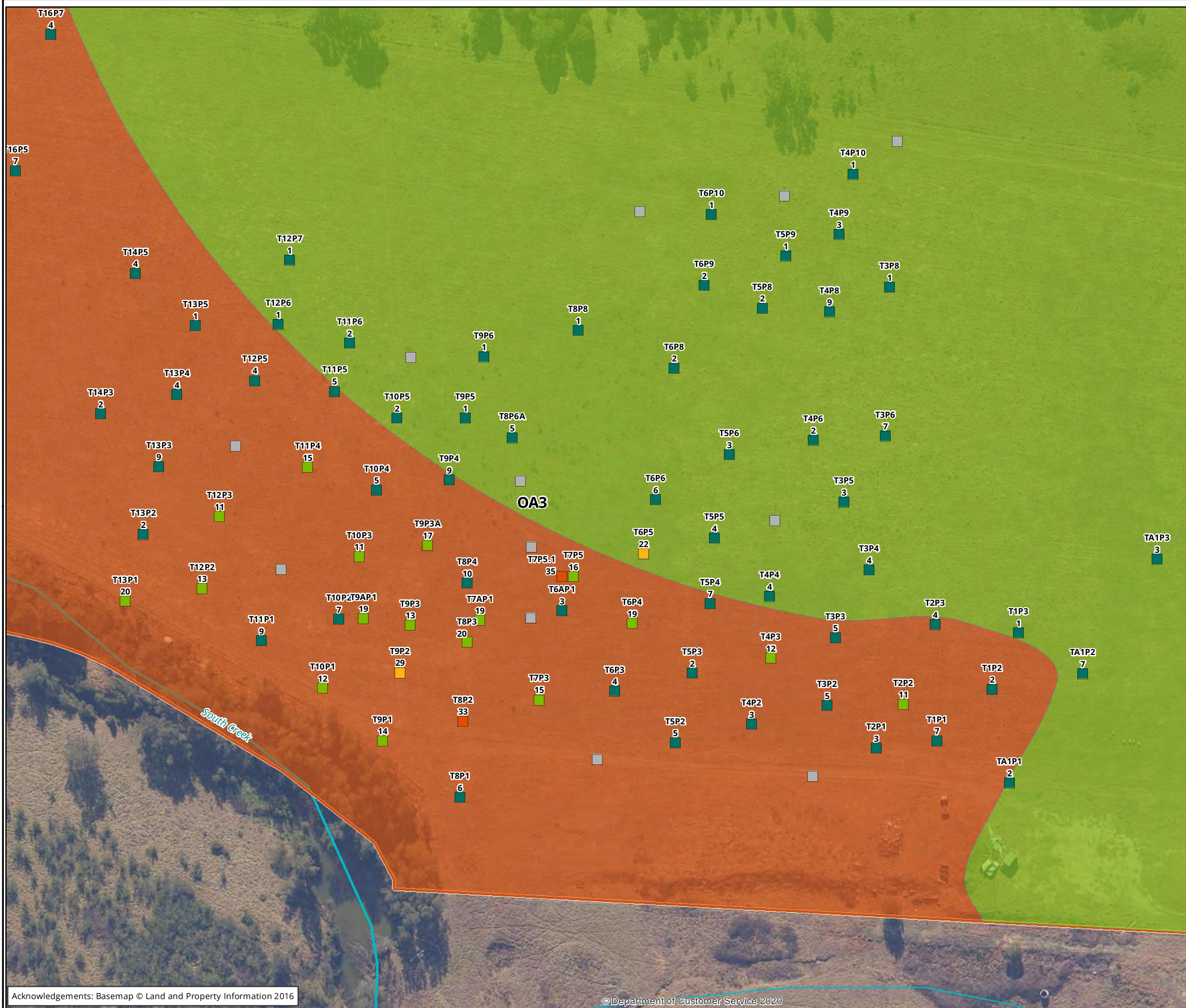
0 10 20 30 40 50  
Metres

Scale: 1:1,500 @ A3  
Coordinate System: GDA 1994 MGA Zone 56

**biosis**  
Biosis Pty Ltd  
Albury, Ballarat, Melbourne,  
Sydney, Newcastle, Wangaratta & Wollongong

Matter: 29083,  
Date: 05 August 2021,  
Checked by: AKE, Drawn by: AEDM, Last edited by: amackegard  
Location: P:\34000s\34009\Mapping\34009\_F5\_SalvageAreas.mxd





#### Legend

Study area

#### Number of artefacts

- 0
- 1 - 10
- 11 - 20
- 21 - 30
- 31 - 35

#### PAD

#### Archaeological potential

- High
- Low

**Figure 5.2: Salvage areas within #45-5-5188 (MSP-02) and #45-5-5189 (MSP-03)**

0 10 20 30 40 50  
Metres

Scale: 1:1,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Albury, Ballarat, Melbourne,  
Sydney, Newcastle, Wangaratta & Wollongong

Matter: 29083,  
Date: 05 August 2021,  
Checked by: AKE, Drawn by: AEDM, Last edited by: amackegard  
Location: P:\34000s\34009\Mapping\34009\_F5\_SalvageAreas.mxd



#### 5.1.7.4 Surface salvage

Surface salvage will be undertaken at AHIMS registered Aboriginal sites 45-5-5184 (MSP-01), 45-5-5188 (MSP-03), #45-5-5342 (MSP-07) and #45-5-5343 (MSP-08) and #45-5-5346 (MSP-11) (if required). The surface collection will be undertaken in the following manner:

- Surface artefacts will be collected under the supervision of nominated RAPs and archaeologists.
- All artefacts collected will be recorded in accordance with Requirement 18, 19 and 20 of the Code and will include:
  - GPS coordinate of each artefact
  - Artefact attributes
  - Photographic record
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Biosis office for analysis (14/17-27 Power Ave, Alexandria NSW 2015).
- Following the salvage of each Aboriginal site, an Aboriginal Site Impact Recording Form (ASIRF) will be prepared and submitted to AHIMS.

#### 5.1.7.5 Post excavation reporting and analysis

At the completion of Aboriginal cultural heritage test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report(s), prepared by a suitable qualified expert. The Aboriginal Cultural Heritage Excavation Report(s), must:

- Be prepared in accordance with the *Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW*, OEH 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010.
- Document the results of any archaeological test excavations and any salvage excavations.
- Undertake recording and analysis of any recovered artefacts in accordance with methods set out in Requirement 19 of the Code, Holdaway and Stern (2004) or other relevant investigations undertaken in the area, whichever is most applicable. Recording of artefacts will include the following minimum attributes; however, additional attributes may be recorded depending on the nature of the assemblage being analysed:
  - Excavation area, transect, pit number and depth
  - Raw material type
  - Artefact type
  - Amount of cortex
  - Retouch/usewear
  - Platform type and measurements
  - Termination type
  - Number of scars, platforms or rotations on cores
  - Length, width, thickness and maximum dimension of artefacts



- Discuss the sample size, characteristics and significance in terms of regional archaeology.
- The RAPs must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, and the relevant Local Aboriginal Land Council, and the RAPs within 24 months of the completion of the Aboriginal archaeological collections and excavations (both test and salvage).

#### **5.1.8 Strategy 8: A strategy for mitigating impacts during development works for Aboriginal site #45-5-5346 (MSP-11)**

During the testing program documented in the AR (Biosis, 2020c), AHIMS 45-5-5346 (MSP-11) was found to be a low density subsurface artefact scatter. Subsequent consultation with RAPs regarding a proposed stormwater drain through a small portion of the site recommended no that further test excavations were needed to characterise the site. RAPs requested a program of mechanical excavation and monitoring along the stormwater drain's corridor.

The following general methods will be utilised to mitigate the impacts to AHIMS 45-5-5346 (MSP-11) during the proposed stormwater drain construction works within a small portion of the site:

- Cultural monitoring to be undertaken by RAPs within the works corridor of MSP-11.
- Grader scrapes along the length of the pipeline corridor prior to bulk earthworks in accordance with the following methodology:
  - Mechanical excavations will utilise an appropriately sized excavator or grader to remove soil in 2 centimetre to 5 centimetre spits or scrapes.
  - Following mechanical removal of each spit of soil, RAPs and an Archaeologist will undertake a walkover of the grader scrape to record and collect any exposed Aboriginal objects.
  - Collection of Aboriginal objects during monitoring of mechanical excavation should follow the protocols for surface collection of artefacts outlined in Section 5.1.7.4 above.
  - Mechanically excavated soil will then be sieved using 5 or 3 millimetre sieves as appropriate. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
  - Inspection of the scrapes and spoil by RAPs to determine if any cultural materials are present.
  - RAPs to monitor the stormwater corridor during works.
- Works are to cease if high concentrations of artefacts are observed, and advice sought from the project archaeologist in consultation with RAPs to determine if manual excavations are required. If manual excavations are required, they will be undertaken in accordance with the following methodology:
  - Salvage excavations will be conducted in 1 x 1 metre units.
  - No more than a combined 100 metres squared will excavated in total within MSP-11
  - Salvage excavations will be conducted by hand (inclusive of trowels, spades and other hand tools).
  - Manual excavations will be conducted in 10 centimetre spits to the base of Aboriginal object-bearing soils identified during the test excavation program.



- All soil excavated during manual excavations will be sieved in 5 or 3 millimetre sieves as appropriate. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
- Shoring or other stabilisation methods may be utilised as required in order to allow for the safe excavation of soils in line with WHS standards.
- The open area may be expanded as required to allow for benching or other stabilisation methods in order to allow for the safe excavation of soils in line with WHS standards.
- The works portion of the site to be temporarily fenced with appropriate fencing and to be backfilled in a controlled manner as part of the proposed development as soon as practicable following completion of the works. No works or impacts to AHIMS 45-5-5346 (MSP-11) are to occur outside of this area.
- The extent of AHIMS 45-5-5346 (MSP-11) is to be clearly marked with star pickets/or pegs and high visibility bunting/fencing to ensure that no impacts can occur to other portions of the site.
- Any cultural material recovered from the salvage area will be collected and brought to the Biosis Sydney office at 14/17-27 Power Ave, Alexandria NSW 2015 for lithic analysis.
- Any datable material will be collected for the purposes of radiometric, AMS or OSL dating. Datable materials will be collected, bagged and clearly labelled accordingly. They will be temporarily stored in the Biosis office at 14/17-27 Power Ave, Alexandria NSW 2015 before being sent off for analysis at reputable institutions.
- Following the works excavations, an AHIMS Aboriginal Site Recording form must be completed and submitted to the AHIMS Registrar as soon as practicable, for AHIMS 45-5-5346 (MSP-11).
- In the event that human remains are discovered, the protocols regarding the discovery of human remains set out in Section 5.1.1 is to be followed.

During all other development works, the boundaries of Aboriginal heritage site #45-5-5346 (MSP-11) Strategy 9 set out in Section 5.1.9 below must be followed.

#### **5.1.9 Strategy 9: A strategy for the long-term management of Aboriginal site #45-5-5346 (MSP-11)**

The long-term management of Aboriginal site #45-5-5346 (MSP-11) should include the following:

- Frasers Property should establish a limit of works to protect Aboriginal site #45-5-5346 (MSP-11).
- The location and boundaries of Aboriginal site #45-5-5346 (MSP-11) will be clearly marked on all site plans, building and lot plans.
- The location and boundaries of Aboriginal site #45-5-5346 (MSP-11) be conveyed to purchasers, tenants or occupiers of the proposed industrial development.
- Any new works in or in the vicinity of Aboriginal site #45-5-5346 (MSP-11) will require an updated impact assessment to be undertaken. If impacts cannot be avoided further approvals from DPIE and archaeological salvage will be required.
- The impact assessment must be prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011) and the Code. The impact assessment must be subject to Aboriginal community consultation in accordance with the consultation guidelines and the ongoing Aboriginal community strategy outlined in 5.1.12 below.



#### **5.1.10 Strategy 10: Long term management of Aboriginal heritage items or material salvaged in accordance with this CHMP**

All Aboriginal objects salvaged in accordance with the CHMP will be temporarily stored in the Biosis office for analysis (14/17-27 Power Ave, Alexandria NSW 2015).

Consultation with RAPs for a long term Care and Control agreement will be conducted following the salvage works outlined in 5.1.7.2 and 5.1.7.3 as part of this CHMP.

Options for long term care and control of any artefacts salvaged include:

- Reburial within previously excavated test pits at Aboriginal site #45-5-5346 (MSP-11).
- Storage within a keeping place agreed on by the RAPs for the project.

Documentation of all salvaged materials will be in accordance with Requirement 26 (Stone artefact disposition and storage) of the Code.

Following the salvage of each Aboriginal site, an Aboriginal Site Impact Recording Form (ASIRF) will be prepared and submitted to AHIMS.

#### **5.1.11 Strategy 11: Maintaining and managing reasonable access for RAPs to Aboriginal heritage items located within the study area throughout the operational life of the project**

In consultation with RAPs, Frasers Property Industrial shall develop a procedure to enable site visits to Aboriginal heritage sites by members of the Aboriginal community.

#### **5.1.12 Strategy 12: Ongoing consultation with RAPs regarding the management and conservation of Aboriginal cultural heritage throughout the operational life of the project**

In consultation with RAPs, Frasers Property Industrial shall develop a strategy for consultation with the Aboriginal community in regard to the ongoing management and conservation of Aboriginal cultural heritage within the study area for the operational life of the project.

Consultation with RAPs will be continued throughout the life of this project as per the contingency consultation plan below:

- RAPs should be consulted:
  - Regarding the preparation of the CHMP.
  - In any subsequent revisions or amendments of the CHMP as set out in Section 8.2, with the exception of the minor amendments described in Section 8.2.1.
  - If unanticipated Aboriginal objects are encountered.
  - Within 24 hours of known Aboriginal ancestral remains being encountered.
  - If a strategy for the care, control and storage of Aboriginal objects needs to be developed.
  - To participate in any specific event based excavations or monitoring of Aboriginal heritage sites.
- RAPs should be given a minimum of 28 days to provide comments on draft salvage excavation reports before submission to Heritage NSW.
- A final copy of the salvage excavations reports should be provided to RAPs within 14 days of report being submitted to Heritage NSW.



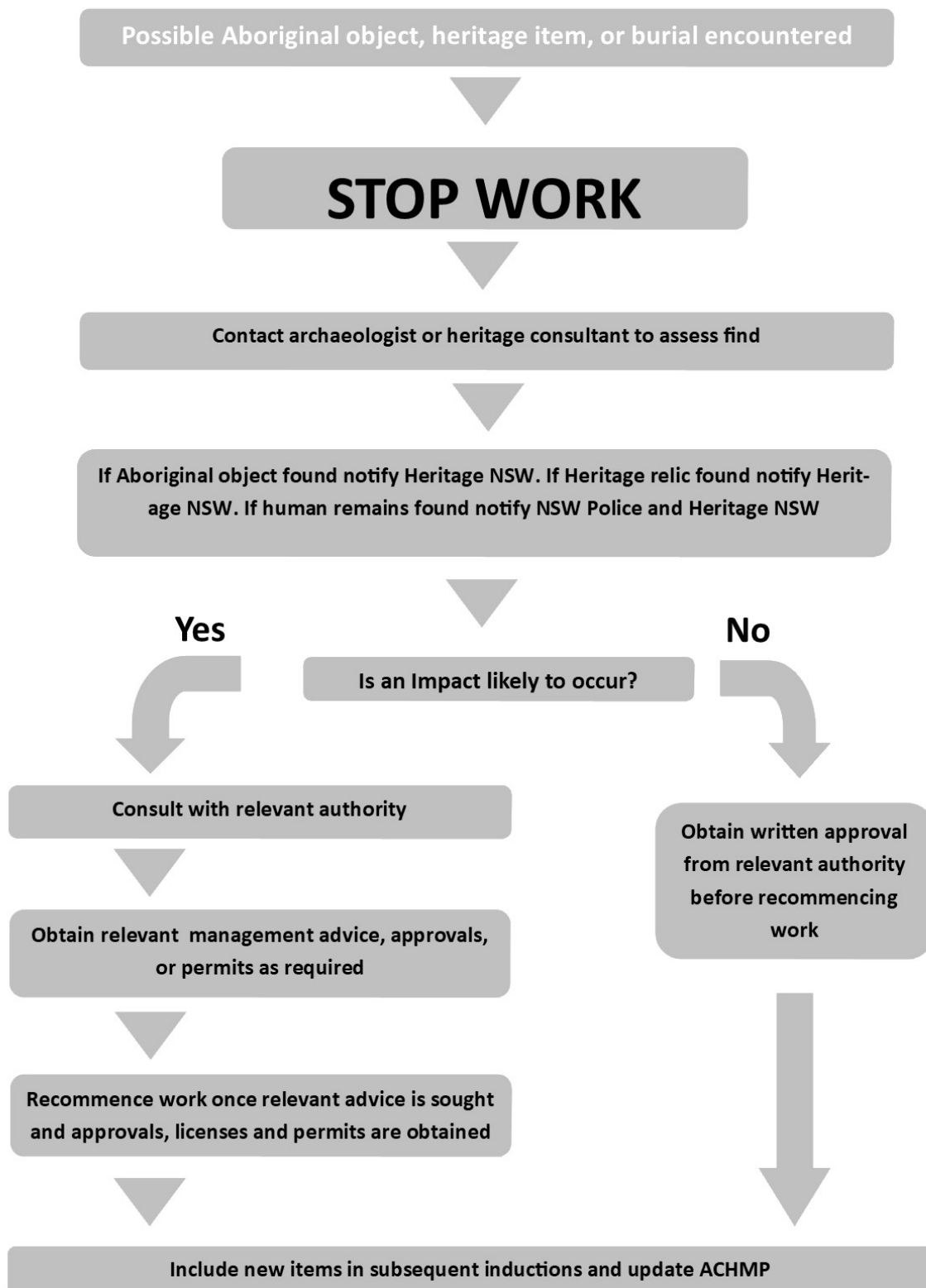
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#### **5.1.13 Strategy 13: Contingency plan to follow in the event of chance/unexpected Aboriginal finds.**

Should any unexpected Aboriginal objects be identified during the course of the development works then the contingency plan in Appendix E should be followed. Figure 5 provides a flowchart outlining the contingency plan.

Please note that Appendix A contains guidelines around the identification of Aboriginal objects and site types.





**Figure 6 Unexpected finds flowchart**



#### 5.1.14 Strategy 14: Contingency plan to follow in the event of unexpected non-Aboriginal finds

Where non-Aboriginal items are identified, an assessment will need to be made as to the significance of the item. Non-Aboriginal heritage items may include archaeological 'relics' or other non-Aboriginal items (i.e. works, structures, buildings or movable objects). The *Heritage Act 1977* defines a relic as '*...any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and is of State or local heritage significance...*'.

The following process should be followed with respect to unexpected items:

- Should any suspected non-Aboriginal items be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.
- The archaeologist will investigate and assess the non-Aboriginal item to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the Project Manager within 24 hours stating:
  - Determination of whether the find is a relic.
  - Advice on whether how the project is to proceed and whether the establishment of any no-go areas is necessary.
  - A recommendation on further works that may be required and timeframe for completion of these works.
- NSW Heritage Division may need to be notified. This will include a statement concerning the find, management measures implemented and notification of any further works arising.
- Should any Aboriginal objects be identified, the procedure outlined in Appendix A shall be implemented.



## 6 Compliance management

### 6.1 Roles and responsibilities

The Frasers Property Industrial Project Manager is responsible for ensuring all activities in this CHMP are carried out during operation of the Mamre South Precinct development, along with reporting any incidents to DPIE and Heritage NSW.

Construction site personnel and contractors must comply with the activities outlined in this CHMP and any deviation to activities outlined in this CHMP must be reported to the Fraser Property Industrial Project Manager. Roles and responsibilities are outlined in Table 5.

The CHMP forms part of the Construction Environmental Management Plan (CEMP), as required under Condition B59 of the Conditions of Consent. The CHMP should be read in conjunction with the CEMP.

**Table 5 Roles and responsibilities and contact details**

Name	Role / responsibility	Contact details
Frasers Property Industrial	Project Manager	TBA
Sydney Planning Team	DPIE (Sydney region)	131 555
Heritage NSW	Heritage NSW	131 555
Amanda Markham	Biosis Senior Archaeologist	0400 988 963

### 6.2 Record keeping

Records of the identified heritage items on the AHIMS standard documentation records must be kept by the archaeologist, site personnel, contractors, and the Frasers Property Industrial Project Manager.

### 6.3 Incidents

If an incident occurs that results in actual or potential impacts on known heritage items and/or archaeological items that are discovered unexpectedly or a breach to this consent, DPIE and Heritage NSW will be informed immediately and a report prepared.

The report to DPIE and Heritage NSW should also be sent to the Frasers Property Industrial Project Manager project archaeologist and RAPs and should include:

- Any contravention to the strategies outlined in the CHMP.
- The nature of the incident.
- The actual or likely impact of the incident on Aboriginal objects and/or Aboriginal places or items of historic heritage.
- The nature and location of the Aboriginal objects and/or places, referring to and providing maps and photos where appropriate.
- The measures which have been taken or will be taken to prevent a recurrence of the incident.



## 6.4 Reporting

Reporting requirements and responsibilities of heritage related issues including unexpected finds and breaches of this consent should be documented as outlined in Table 4 below:

**Table 6 Reporting roles and responsibilities**

Action	Responsibility
A short summary report	Archaeologist
Describe any ongoing consultation with or involvement of RAPs	Project Manager/Archaeologist
Provide details of the Aboriginal objects which were fully or partially harmed in the course of undertaking the construction or if conditions of this consent are breached.	Construction contractor/Project Manager/Archaeologist
Detail any community collection of Aboriginal objects undertaken by the RAPs	Archaeologist
Comment on the effectiveness of any mitigation measures that were implemented	Construction contractor
Comment on the effectiveness of any mitigation plan which was in place	Construction contractor
If any Aboriginal objects were moved to a temporary storage location, a description of the nature and types of Aboriginal objects which are now at that location	Archaeologist
Detail the results of any analysis of Aboriginal objects	Archaeologist
Detail the long term management arrangements for any Aboriginal objects	Archaeologist



## 7 Training and awareness

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All site personnel must comply with all Frasers Property Industrial Work Health and Safety (WHS) manuals and procedures. As part of the operation of the Mamre South Precinct development, site personnel must undertake a cultural heritage induction which will include:

- A description of Aboriginal cultural heritage in Australia.
- A description of Aboriginal cultural heritage in the Penrith LGA.
- A description of the tangible and intangible aspects of Aboriginal heritage and why it is important.
- An overview of the NPW Act and the *Heritage Act 1977* and the implications and fines applicable for breaching the Acts.
- A general overview of historic heritage in the Penrith LGA.
- A description of all historic heritage site types within the study area.
- The process for reporting unknown cultural heritage sites.
- The process for reporting damage to cultural heritage sites.
- The process for reporting human remains.

In addition to the above, Biosis will provide an overview of each recorded Aboriginal heritage site which has been identified on the Mamre South Precinct development. This will include:

- The site boundaries and how they have been marked.
- The content of the site.
- Whether any salvage works have taken place.



## 8 Review and improvement

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### 8.1 Continuous improvement

Opportunities for the improvement of this CHMP will be found through the ongoing evaluation of environmental management performance against environmental policies, objectives and targets. The purpose of this is to:

- Identify opportunities for the improvement of environmental management and performance.
- Determine the cause or causes of non-conformances and deficiencies.
- Development and implementation of a plan of corrective and preventative actions to address any non-conformances and deficiencies in this CHMP.
- Corroborate the efficiency of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.
- Revise the objectives and targets of this CHMP accordingly.

### 8.2 CHMP update and amendment

Updates and amendments will occur as needed. A copy of the updated CHMP and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure within 14 days of finalisation.

Revisions to this CHMP, if required, must be undertaken by a suitably qualified archaeologist in consultation with Frasers Property Industrial, DPIE and Heritage NSW. With the exception of the minor changes defined below, the amended CHMP must be forwarded to RAPs for review and comment if required and also forwarded to the Planning Secretary for approval.

A review and amendment to this CHMP must be conducted by a suitably qualified archaeologist in the following instances:

- If recommended by an independent audit.
- Within one month of changes to the Conditions of Consent, license conditions or relevant legislation relating to Aboriginal heritage.
- Within one month of any reportable Aboriginal heritage-related incidents within the Project's construction footprint.
- Within one month of the discovery of a previously unidentified heritage item.

Revised versions of the CHMP will be made available and distributed to RAPs through the processes described in Section 5.1.12. Changes will also be communicated through toolbox talks to existing onsite personnel and incorporated into environmental induction materials.

#### 8.2.1 Minor permissible amendments

Minor permissible changes to the CHMP which do not require comments from RAPs or the Planning Secretary are as follows:

- Changes that are administrative in nature (e.g. staff and agency/authority name changes)



- Changes in response to audit findings or periodic reviews, subject to the significance of any audit or review findings.
- Do not compromise the ability of the Project to meet legislative requirements and are consistent with terms of the approval, and does not include any modifications to the terms of Project approval.



## References

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Bowler, J. M. *et al.* (2003) 'New ages for human occupation and climatic change at Lake Mungo, Australia', *Nature*, 421(6925), pp. 837–840. doi: 10.1038/nature01383.

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Holdaway, S. and Stern, N. (2004) *A Record in Stone: The study of Australia's flaked stone artefacts*. Canberra: Aboriginal Studies Press.

NSW Heritage Branch, Department of Planning (2009) 'Assessing Significance for Historical Archaeological Sites and "Relics"'. Heritage Council of NSW. Available at: <https://www.environment.nsw.gov.au/resources/heritagebranch/heritage/ArchSignificance.pdf>.

OEH (2011) 'Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW'. Available at: Office of Environment and Heritage, Department of Premier and Cabinet, Sydney NSW.



## Appendix A: Identifying Aboriginal objects and site types



### Isolated stone artefact

Stone artefacts are any that item of stone material made or modified by people, including any debris left behind when such tools were made. Materials used to make stone artefacts may be found locally, or traded across long distances.



### Stone artefact scatter

Stone artefact scatter sites comprise groups of stone tools, debris and the tools used in manufacture (i.e. stone anvils and hammerstones). Artefact scatters can range from high-density concentrations of flaked stone and ground stone artefacts to sparse, low-density 'background' scatters and isolated finds.



### Shell midden

Shell middens are the remains of food production and processing areas, where people would have sat down to eat, cook or prepare food. Shell middens occur commonly in coastal areas, however they also occur inland watercourses where freshwater mussels and other edible mollusc species may be present.





### **Modified tree**

A modified tree is any tree from which the bark has been cut or harvested for the manufacture of containers (coolamon), canoes, shields, weapons and medicines. Scarring also occurred where toeholds were cut to allow people to climb trees to hunt possums, reptiles, birds or harvest wild honey. A number of modified trees have been identified within the project area.



### **Burial**

Burials comprise any traditional Aboriginal human skeletal remains, intact or fragmentary. Burials are common within the project area. If any suspected human remains are encountered, the procedure set out in Section 5.1.1 must be followed.



### **Aboriginal gathering and resource location**

Resource gathering locations are places where food, medicines and plant material used as twine, in weaving or tool making by Aboriginal people exist. Many such locations are still accessed by contemporary Aboriginal people.





### Hearth

A hearth is the remains of a campfire, an oven or other food cooking and processing areas. Hearths commonly contain baked clay, termite mound fragments broken up and used as 'heat retainers', small stones used in cooking, charcoal, burnt bone, shell and other food remnants. Hearths are moderately common within the study area.



## Appendix B: Identifying historical heritage items

If any historical relics are identified then the unexpected finds process must be followed. As stated above, non-Aboriginal heritage items may include archaeological 'relics' or other historical items (i.e. works, structures, buildings or movable objects).

Historical heritage items/objects can consist of the following materials:

- Ceramic
- Glass
- Organic material
- Leather
- Metal
- Synthetic

Historical relics can consist of single items, dense archaeological deposits, built structures and landscapes. Examples of heritage items are shown in photographs below.



**Ceramic plate fragments**





**Glass artefacts**



**Ceramic artefacts**





**Cesspit filled with ash**





**A drainage system**



**Wall footings**





**Dense artefact deposits**



**Historic well**



## Appendix C: Resume of report authors

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# Dr Amanda Markham

## Position

### Senior Archaeologist/Anthropologist

The senior archaeologist and anthropologist is a technical expert who provides coaching and advice to other team members. Duties include internal project management of large projects, client relationship management, report writing and internal quality assurance. The senior archaeologist and anthropologist leads large project teams.



## Qualifications

**BA Hons (Anthropology/Sociology), PhD (Anthropology)**

**Grad. Cert (Archaeology)**

**MA (Archaeology) - current**

## Professional experience

Amanda Markham has over 20 years' experience in Anthropology and Archaeology throughout Australia, including extensively in remote outback Australia. Her project experience includes working for Aboriginal representative bodies, mining and exploration companies, Commonwealth, state and territory government agencies, community groups and Indigenous stakeholder groups. Over her career Amanda has developed a deep understanding of Aboriginal people and culture and has extensive experience providing advice on Aboriginal cultural heritage management.

Amanda's particular areas of expertise include cultural heritage management field work in remote areas with Aboriginal Traditional Owners, conducting heritage assessments under state and territory legislation, skeletal remains assessment and conducting archaeological and anthropological surveys and assessments.

Amanda has proven staff and project management skills and ability to simultaneously oversee multiple large complex projects to deliver client outcomes within tight time frames and budget constraints. Amanda's excellent communication and negotiation skills have seen her easily managing and building relationships between Aboriginal people and senior government and corporate figures.

## Key project experience

### Project Manager/Archaeologist

Menindee to Pooncarie Road 60 kilometres road upgrade, Aboriginal cultural heritage assessment. Aboriginal archaeological test excavations, skeletal remains assessments for Greend Edge Environmental on behalf of Central Darling Shire.



**Project Manager/Archaeologist**

Mamre South (Kemps Creek) Industrial Precinct State Significant Development Aboriginal due diligence assessment, historic heritage assessment, Aboriginal cultural heritage assessment and Aboriginal archaeological salvage works for Frasers Property and Altis Property Partners, Kemps Creek, Western Sydney.

**Project Manager/Archaeologist**

Concord Repatriation General Hospital Redevelopment Stage 1 Works. Aboriginal due diligence assessment, historic heritage assessment, Aboriginal cultural heritage assessment, Statement of heritage impact, archival recording, skeletal (faunal) remains assessment for Johnstaff on behalf of Health Infrastructure NSW.

**Project Manager/Archaeologist**

Nimmie-Caira Interim Land Management Aboriginal Cultural Heritage Assessment. Aboriginal Heritage Impact Permit (AHIP), Aboriginal cultural heritage assessment, skeletal remains assessments, archaeological test excavations and cultural heritage management plan for Department of Planning, Infrastructure and Environment (SDLAM Water).

**Archaeologist/Quality Assurance**

Toorale National Park Environmental Water Delivery Scheme. Aboriginal Heritage Impact Permit (AHIP), Aboriginal cultural heritage assessment, archaeological test excavations and cultural heritage management plan for Office of Environment & Heritage, Dubbo NSW.

**Other qualifications and training**

General Induction for Construction Work in NSW, Work Cover

Provide first aid –St John Ambulance Australia

Advanced 4WD driving and vehicle recovery

**Professional affiliations and memberships**

Australian Archaeology Association (AAA)



## Position

Senior Archaeologist

## Qualifications

BA (Hons)



## Professional experience

Samantha is an archaeologist with Biosis Wollongong office and has over five years of experience as an archaeologist. Samantha has had experience working as an archaeologist and project manager on a number of Aboriginal and European heritage projects across New South Wales, including water infrastructure and linear projects, residential development projects, renewable energy projects, and telecommunications projects. As part of these project Samantha has interacted with a diverse client base including Local Government, National Parks and Wildlife Service, Department of Primary Industry and Water, resource companies, architectural firms, engineering firms, and private developers.

Samantha has experience in undertaking remote Aboriginal archaeological surveys and large scale archaeological testing excavation programs and has served as a key team member and project manager on a number of projects in the Illawarra, the South Coast, Canberra, and Far Western NSW. These projects have seen her take part in Aboriginal community consultation, background research, archaeological excavation and survey, and has authored numerous Aboriginal heritage assessments and Statement of Heritage Impact reports. Samantha is also accomplished in obtaining approvals under the *NSW National Parks and Wildlife Act 1974*.

Samantha has a particular focus on rock art assemblages and ochre in the north-west Kimberley region of Australia and is currently undertaking a PhD in this region.

## Key project experience

<b>Project Manager/Archaeologist</b>	Princes Highway Upgrade Program: Milton Ulladulla Bypass archaeological services for Transport for NSW.
<b>Archaeologist</b>	Canberra Mountain Bike Trails, Heritage Constraints Assessment for World Trail.
<b>Project Manager/Archaeologist</b>	Toorale National Park Environmental Water Delivery Scheme, Aboriginal Heritage Impact Permit (AHIP), Aboriginal cultural heritage assessment, archaeological test excavations and cultural heritage management plan for Department Planning, Industry and Environment (DPIE).
<b>Project Manager/Archaeologist</b>	North West Mains modification, Wongawilli Colliery Aboriginal cultural heritage assessment for Wollongong Coal Pty Ltd.



<b>Archaeologist</b>	Menindee to Pooncarie Road 60 kilometres road upgrade, Aboriginal cultural heritage assessment for Green Edge Environmental on behalf of Central Darling Shire.
<b>Project Manager/Archaeologist</b>	Barlings Beach Holiday Park Aboriginal cultural heritage assessment and archaeological test excavations for Aspen Group.
<b>Project Manager/Archaeologist</b>	Albion Park Quarry modification Aboriginal cultural heritage assessment for Cleary Bros (Bombo) Pty Ltd.
<b>Project Manager/Archaeologist</b>	Gerroa Sand Quarry modification Aboriginal cultural heritage assessment, archaeological test excavations, and an Aboriginal cultural heritage management plan for Cleary Bros (Bombo) Pty Ltd.
<b>Project Manager/Archaeologist</b>	Tallawarra North and Central Precincts Aboriginal cultural heritage assessment, archaeological test excavations, and Aboriginal cultural heritage management plan for Cardno.
<b>Project Manager/Archaeologist</b>	New Berrima masonry plant Aboriginal cultural heritage assessment, archaeological test excavations and Aboriginal cultural heritage management plan for Brickworks Ltd.
<b>Project Manager/Archaeologist</b>	Minnamurra Boardwalk Aboriginal cultural heritage assessment and archaeological test excavations for Kiama Municipal Council/
<b>Archaeologist</b>	Nimmie-Caira Interim Land Management Aboriginal Cultural Heritage Assessment, Aboriginal Heritage Impact Permit (AHIP), archaeological test excavations and cultural heritage management plan for Department of Planning, Infrastructure and Environment (SDLAM Water).
<b>Archaeologist</b>	Fitzpatrick Street, Menangle Park Aboriginal cultural heritage assessment and archaeological test excavations for Michael Brown Planning Strategies.

### Other qualifications and training

General Induction for Construction Work in NSW, Work Cover

Provide first aid, St. John's Ambulance Australia

Lithics Masterclass, University of Sydney

Zooarchaeology unit, University of New England

### Professional affiliations and memberships

Australian Archaeological Association (AAA)

### Publications

Moore, M.W., Westaway, K., Ross, J., Newman, K., Perston, Y., Huntley, J., **Keats, S.**, Kandiwal Aboriginal Corporation and M.J. Morwood 2020 Archaeology and art in context: Excavations at the Gunu Site Complex, Northwest Kimberley, Western Australia. PLoS ONE 15(2): e0226628.  
<https://doi.org/10.1371/journal.pone.0226628>



## Position

Team Leader - Heritage

## Qualifications

BASc (Hons - Archaeology)



## Professional experience

Taryn has 10 years' archaeological consultancy experience, as well as extensive volunteering experience on archaeological research projects overseas. Taryn has a strong background in project management, leading project teams and volunteer groups in heritage management projects throughout New South Wales and Western Australia. Taryn has successfully completed numerous projects throughout the Sydney, Wollongong, Newcastle, Hunter Valley, Liverpool Plains, North Western, South Western, and Alpine NSW regions.

Taryn has extensive experience in undertaking remote archaeological surveys and large scale archaeological testing and salvage excavation programs. Taryn has participated in and managed a number of long term archaeological programs under Part 4 and Part 5 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

Her areas of expertise include archaeological and heritage management advice, archaeological excavation and survey, artefact analysis, Aboriginal community consultation, technical report writing, and preparing cultural heritage management plans. Taryn is also accomplished in obtaining approvals under the *NSW National Parks and Wildlife Act 1974*.

Taryn has conducted numerous archaeological assessments for a diverse client base including Local Government, Roads and Maritime Services, the Australian Rail Track Corporation, Sydney Water, National Parks and Wildlife Service, Department of Primary Industry and Water, resource companies, architectural firms, engineering firms, and private developers.

## Key project experience

<b>Project Director / Archaeologist</b>	Medowie Road Signalised Intersection Upgrade Aboriginal Cultural Heritage Assessment, archaeological test excavations, Cultural Heritage Management Plan, and Aboriginal archaeological salvage works for the Diocese of Maitland, Newcastle.
<b>Project Manager / Archaeologist</b>	Medowie Catholic College Historical Heritage Assessment, Aboriginal Cultural Heritage Assessment, archaeological test excavations, Cultural Heritage Management Plan, and Aboriginal archaeological salvage works for the Diocese of Maitland, Newcastle.



<b>Project Manager / Archaeologist</b>	Cabramatta Loop State Significant Infrastructure Project Aboriginal Cultural heritage Assessment and test excavations for GHD and ARTC, Sydney.
<b>Project Manager / Archaeologist</b>	MacMasters Beach and Copacabana Beach Aboriginal Cultural Heritage Assessment, and Cultural Heritage Management Plan for Central Coast Council.
<b>Project Manager / Archaeologist</b>	Great Artesian Water Basin efficiency scheme Aboriginal Cultural Heritage assessment for the Department of Primary Industry Crown Lands and Water.
<b>Project Manager / Archaeologist</b>	Confidential Pipeline Project Central Western NSW Historical Heritage assessment, Aboriginal Cultural Heritage Assessment and archaeological test excavations for APA Group.
<b>Project Manager/Archaeologist</b>	NBN rollout across NSW: Field survey and Aboriginal due diligence heritage assessments for Tata Consultancy Services.
<b>Archaeologist/Quality Assurance</b>	Minnamurra River Boardwalk. Aboriginal cultural heritage assessment, Aboriginal Heritage Impact Permit (AHIP) and archaeological test excavations for Kiama Municipal Council.
<b>Archaeologist/Quality Assurance</b>	Toorale National Park Environmental Water Delivery Scheme. Aboriginal Heritage Impact Permit (AHIP), Aboriginal cultural heritage assessment, archaeological test excavations and cultural heritage management plan for Office of Environment & Heritage, Dubbo NSW.

### Other qualifications and training

Current Senior First Aid

NSW Construction Induction Card

4WD Training - 'Certificate III in Outdoor Recreation'

Rail Industry Safety Induction Card

### Professional affiliations and memberships

Australian Archaeological Association



## Appendix D: RAP and Heritage NSW consultation

A copy of the draft CHMP was sent to all RAPs on 4 November 2020. One response was received from Muragadi Heritage Indigenous Corporation stating that they had read the draft CHMP and agreed with the recommendations made.

A copy of the CHMP was sent to Heritage NSW on 16 March 2021. Comments received from Heritage NSW have been incorporated into this CHMP and details of this correspondence are included below. Additional comments from Heritage NSW on the CHMP were contained within correspondence dated 16 July 2021 from DPIE in response to a modification to the Conditions of Consent (SSD-9522-Mod-1). These have been also incorporated in the CHMP. A copy of SSD-9522-Mod-1 and Biosis' response are appended to this section.

Details of the consultation undertaken as part of the development of the CHMP are outlined below.

	Contact organisation	Person	Date sent	Response
1	Aboriginal Archaeological Service Inc.	Andrew Williams	4/11/2020 - email	N/A
2	Barking Owl Aboriginal Corporation	Jody Kulakowski	4/11/2020 - email	N/A
3	Barraby Cultural Services	Lee Field	4/11/2020 - email	N/A
4	Corroborree Aboriginal Corporation	Marilyn Carroll-Johnson	4/11/2020 - email	N/A
5	Darug Aboriginal Land Care	Desmond Dyer	4/11/2020 - email	N/A
6	Darug Boorooberongal Elders Aboriginal Corporation	Uncle Gordon Workman	4/11/2020 - email	N/A
7	Darug Custodian Aboriginal Corporation	Justine Coplin	4/11/2020 - email	N/A
8	Darug Land Observations	Jamie Workman and Anna Workman	4/11/2020 - email	N/A
9	Darug Tribal Aboriginal Corporation	Dirk Schmitt	4/11/2020 - email	N/A
10	Deerubbin Local Aboriginal Land Council	Steven Randall	4/11/2020 - email	N/A
11	Didge Ngunawal Clan	Lilly and Paul Carrol and Boyd	4/11/2020 - email	N/A
12	Gulaga	Wendy Smith	4/11/2020 - email	N/A
13	Kawul Cultural Services	Vicky Slater	4/11/2020 - email	N/A
14	Muragadi Heritage Indigenous Corporation	Jesse Johnson	4/11/2020 - email	18/11/2020 - I have read the project information and draft CHMP for the above project, I agree with the



	Contact organisation	Person	Date sent	Response
				recommendations made.
15	Murra Bidgee Mullangari Aboriginal Corporation	Ryan Johnson	4/11/2020 - email	N/A
16	Tocomwall	Scott Franks	4/11/2020 - email	N/A
17	Wailwan Aboriginal Digging Group	Philip Boney	4/11/2020 - email	N/A
18	Wurrumay Consultancy	Kerrie Slater	4/11/2020 - email	N/A
19	Yulay Cultural Services	Arika Jalomaki	4/11/2020 - email	N/A
20	Yurrandaali Cultural Services	Bo Field	4/11/2020 - email	N/A
21	Kamilaroi-Yankuntjatjara Working Group	Phil Khan	4/11/2020 - email	email

Fraser's Property Industrial advised that a stormwater drain would need to be constructed through a section of one site, AHIMS 45-5-5346 (MSP-11). To this end, Biosis sought to vary Strategy 9 of the CHMP, which specifically relates to the long term management of AHIMS 45-5-5346 (MSP-11).

Biosis provided an information pack to registered Aboriginal parties information about the proposed works and changes to the CHMP, and to seek feedback to inform the process. The information pack was sent on the 25 May 2021 and groups were given 28 days to provide comment.

Details of the consultation undertaken as part of the CHMP variation are outlined below.

	Contact organisation	Person	Date sent	Response
1	Aboriginal Archaeological Service Inc.	Andrew Williams	25/5/2021 - email	N/A
2	Barking Owl Aboriginal Corporation	Jody Kulakowski	25/5/2021 - email	N/A
3	Barraby Cultural Services	Lee Field	25/5/2021 - email	N/A
4	Corroborree Aboriginal Corporation	Marilyn Carroll-Johnson	25/5/2021 - email	25/5/2021 – email: Agreed with methodology
5	Darug Aboriginal Land Care	Desmond Dyer	25/5/2021 - email	N/A
6	Darug Boorooberongal Elders Aboriginal Corporation	Uncle Gordon Workman	25/5/2021 - email	N/A
7	Darug Custodian Aboriginal Corporation	Justine Coplin	25/5/2021 - email	2/6/2021 – email: Agreed with recommendations
8	Darug Land Observations	Jamie Workman and Anna Workman	25/5/2021 - email	N/A
9	Darug Tribal Aboriginal Corporation	Dirk Schmitt	25/5/2021 - email	N/A



	Contact organisation	Person	Date sent	Response
10	Deerubbin Local Aboriginal Land Council	Steven Randall	25/5/2021 - email	N/A
11	Didge Ngunawal Clan	Lilly and Paul Carrol and Boyd	25/5/2021 - email	N/A
12	Gulaga	Wendy Smith	25/5/2021 - email	N/A
13	Kawul Cultural Services	Vicky Slater	25/5/2021 - email	N/A
14	Muragadi Heritage Indigenous Corporation	Jesse Johnson	25/5/2021 - email	18/11/2020 - I have read the project information and draft CHMP for the above project, I agree with the recommendations made.
15	Murra Bidgee Mullangari Aboriginal Corporation	Ryan Johnson	25/5/2021 - email	N/A
16	Tocomwall	Scott Franks	25/5/2021 - email	N/A
17	Wailwan Aboriginal Digging Group	Philip Boney	25/5/2021 - email	N/A
18	Wurrumay Consultancy	Kerrie Slater	25/5/2021 - email	6/6/2021 – email: Agreed with methodology
19	Yulay Cultural Services	Arika Jalomaki	25/5/2021 - email	23/6/2021 – email: Agreed with methodology
20	Yurrandaali Cultural Services	Bo Field	25/5/2021 - email	N/A
21	Kamilaroi-Yankuntjatjara Working Group	Phil Khan	25/5/2021 - email	15/6/2021 – email: Agreed with methodology

Biosis also sought advice from Heritage NSW regarding the proposed mitigation strategy for stormwater works within AHIMS #45-5-5346 (MSP-11) on 20 May 2021. Heritage NSW provided comments and recommendations on 27 July 2021. These recommendations have been incorporated into the CHMP. A copy of the correspondence from Heritage NSW and Biosis' response are appended to this section.

Biosis provided an information pack to registered Aboriginal parties information about the project and the updated changes to the CHMP, and to seek feedback. The information pack was sent on the 16 August 2021 and groups were given 28 days to provide comment.

Details of the consultation undertaken as part of the CHMP variation are outlined below.

	Contact organisation	Person	Date sent	Response
1	Aboriginal Archaeological Service Inc.	Andrew Williams	16/08/2021 – email	N/A
2	Barking Owl Aboriginal Corporation	Jody Kulakowski	16/08/2021 – email	N/A
3	Barraby Cultural Services	Lee Field	16/08/2021 – email	N/A



	Contact organisation	Person	Date sent	Response
4	Corroborree Aboriginal Corporation	Marilyn Carroll-Johnson	16/08/2021 – email	N/A
5	Darug Aboriginal Land Care	Desmond Dyer	16/08/2021 – email	N/A
6	Darug Boorooberongal Elders Aboriginal Corporation	Uncle Gordon Workman	16/08/2021 – email	N/A
7	Darug Custodian Aboriginal Corporation	Justine Coplin	16/08/2021 – email	25/08/2021 – email agrees with changes made in this report
8	Darug Land Observations	Jamie Workman and Anna Workman	16/08/2021 – email	N/A
9	Darug Tribal Aboriginal Corporation	Dirk Schmitt	16/08/2021 – email	N/A
10	Deerubbin Local Aboriginal Land Council	Steven Randall	16/08/2021 – email	N/A
11	Didge Ngunawal Clan	Lilly and Paul Carrol and Boyd	16/08/2021 – email	N/A
12	Gulaga	Wendy Smith	16/08/2021 – email	17/08/2021 – email Gulaga makes no comment at this stage
13	Kawul Cultural Services	Vicky Slater	16/08/2021 – email	N/A
14	Muragadi Heritage Indigenous Corporation	Jesse Johnson	16/08/2021 – email	N/A
15	Murra Bidgee Mullangari Aboriginal Corporation	Ryan Johnson	16/08/2021 – email	N/A
16	Tocomwall	Scott Franks	16/08/2021 – email	N/A
17	Wailwan Aboriginal Digging Group	Philip Boney	16/08/2021 – email	N/A
18	Wurrumay Consultancy	Kerrie Slater	16/08/2021 – email	N/A
19	Yulay Cultural Services	Arika Jalomaki	16/08/2021 – email	N/A
20	Yurrandaali Cultural Services	Bo Field	16/08/2021 – email	N/A
21	Kamilaroi-Yankuntjatjara Working Group	Phil Khan	16/08/2021 – email	06/09/2021 – email provided relationship to the study area.



**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:29 PM  
**To:** 'murrabidgeemullangari@yahoo.com.au'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_13.pdf

Hi Ryan,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

If you could please provide comment on this document by **5pm on Friday 20 November 2020**, it would be greatly appreciated.

All correspondence regarding feedback on the ACHMP should be provided in writing to **Dr. Amanda Markham**. Her contact details can be found in the attached cover letter.

Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:28 PM  
**To:** 'yulayculturalservices@gmail.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consulta<sup>on</sup>  
**Attachments:** 34009.Draft.ACHMP.DFT01\_20.pdf

Hi Arika,

Further to your registra<sup>on</sup> of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assis<sup>ng</sup> Frasers Property Industrial with consulta<sup>on</sup> with the Aboriginal community, in accordance with the recommenda<sup>ons</sup> provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addi<sup>on</sup> to a cover le<sup>er</sup> for the project a<sup>ached</sup> to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

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Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:28 PM  
**To:** 'aas.info@bigpond.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_1.pdf

Hi Andrew,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

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Kind regards,

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M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:28 PM  
**To:** 'jus\_necoplin@optusnet.com.au'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_11.pdf

Hi Jusne,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

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D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:26 PM  
**To:** 'vicki.slater@hotmail.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_17.pdf

Hi Vicky,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

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M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:26 PM  
**To:** 'yurrandaali\_cs@hotmail.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_21.pdf

Hi Bo,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

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Kind regards,

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D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:26 PM  
**To:** 'Barking Owl Aboriginal Corpora on'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultaon  
**Attachments:** 34009.Draft.ACHMP.DFT01\_2.pdf

Hi Jody,

Further to your registraon of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisng Frasers Property Industrial with consultaon with the Aboriginal community, in accordance with the recommendaons provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addion to a cover leter for the project ached to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

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Kind regards,

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M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:26 PM  
**To:** 'barrabyculturalservices@gmail.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_3.pdf

Hi Lee,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

If you could please provide comment on this document by **5pm on Friday 20 November 2020**, it would be greatly appreciated.

All correspondence regarding feedback on the ACHMP should be provided in writing to **Dr. Amanda Markham**. Her contact details can be found in the attached cover letter.

Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:25 PM  
**To:** 'boorooberongal@outlook.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consulta<sup>n</sup> on  
**Attachments:** 34009.Draft.ACHMP.DFT01\_4.pdf

Hi Gordon,

Further to your registra<sup>n</sup> of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assist<sup>ng</sup> Frasers Property Industrial with consulta<sup>n</sup> with the Aboriginal community, in accordance with the recommenda<sup>n</sup>s provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addi<sup>n</sup> to a cover le<sup>t</sup>er for the project a<sup>n</sup>ched to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

If you could please provide comment on this document by **5pm on Friday 20 November 2020**, it would be greatly appreciated.

All correspondence regarding feedback on the ACHMP should be provided in writ<sup>ng</sup> to **Dr. Amanda Markham**. Her contact details can be found in the a<sup>n</sup>ched cover le<sup>t</sup>er.

Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:25 PM  
**To:** 'corroboreecorp@bigpond.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_5.pdf

Hi Marilyn,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

If you could please provide comment on this document by **5pm on Friday 20 November 2020**, it would be greatly appreciated.

All correspondence regarding feedback on the ACHMP should be provided in writing to **Dr. Amanda Markham**. Her contact details can be found in the attached cover letter.

Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:24 PM  
**To:** 'gulagachts@gmail.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_10.pdf

Hi Wendy,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

If you could please provide comment on this document by **5pm on Friday 20 November 2020**, it would be greatly appreciated.

All correspondence regarding feedback on the ACHMP should be provided in writing to **Dr. Amanda Markham**. Her contact details can be found in the attached cover letter.

Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:24 PM  
**To:** 'philip khan'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_14.pdf

Hi Phil,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

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Kind regards,

**Ashley Bridge**  
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M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:23 PM  
**To:** 'wurrumay@hotmail.com'  
**Cc:** 'vicki.slater@hotmail.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consulta<sup>o</sup>n  
**Attachments:** 34009.Draft.ACHMP.DFT01\_19.pdf

Hi Kerrie,

Further to your registra<sup>o</sup>n of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assis<sup>o</sup>ng Frasers Property Industrial with consulta<sup>o</sup>n with the Aboriginal community, in accordance with the recommenda<sup>o</sup>ns provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addi<sup>o</sup>n to a cover le<sup>o</sup>ter for the project a<sup>o</sup>ached to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

If you could please provide comment on this document by **5pm on Friday 20 November 2020**, it would be greatly appreciated.

All correspondence regarding feedback on the ACHMP should be provided in wri<sup>o</sup>ng to **Dr. Amanda Markham**. Her contact details can be found in the a<sup>o</sup>ached cover le<sup>o</sup>ter.

Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:22 PM  
**To:** 'waarlan12@outlook.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_18.pdf

Hi Philip,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

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M: 0437 689 734  
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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:22 PM  
**To:** 'Steve Randall'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_16.pdf

Hi Steve,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:21 PM  
**To:** 'didgengunawalclan@yahoo.com.au'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_9.pdf

Hi Lilly and Paul,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

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Kind regards,

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E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:20 PM  
**To:** 'Darug Land Observations'  
**Subject:** 34009 - Mamre South ACHMP - draft report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_7.pdf

Hi Jamie and Anna,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

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Kind regards,

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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:20 PM  
**To:** 'desmond4552@hotmail.com'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_8.pdf

Hi Desmond,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

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Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:20 PM  
**To:** 'sco @tocomwall.com.au'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_15.pdf

Hi Sco,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

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Kind regards,

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Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:19 PM  
**To:** 'darug\_tribal@live.com.au'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_6.pdf

Hi Dirk,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

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Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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**From:** Ashley Bridge  
**Sent:** Wednesday, 4 November 2020 12:29 PM  
**To:** 'muragadi@yahoo.com.au'  
**Subject:** 34009 - Mamre South ACHMP - dra. report - community consultation  
**Attachments:** 34009.Draft.ACHMP.DFT01\_12.pdf

Hi Jesse,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

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Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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4 November 2020

Andrew Williams  
Aboriginal Archaeological Service Inc.  
2/24 Goodwin Street  
Narrabeen NSW 2101

Dear Andrew Williams,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**  
**Our Ref: Matter 34009**

Biosis Pty Ltd (Biosis) was commissioned by Frasers Property Industrial to produce an Aboriginal Cultural Heritage Management Plan (ACHMP) to manage impacts to Aboriginal heritage during works associated with the Mamre South Precinct development, located in Kemps Creek, New South Wales (NSW). The ACHMP has been prepared to specifically address recommendations issued by Heritage NSW to the Department of Planning, Industry and Environment (DPIE) following an ACHA undertaken by Biosis in 2019.

Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community in accordance with the recommendation provided by Heritage NSW.

Please find attached a copy of the ACHMP for your review. Please note that this is a **draft** document. A final version of the document, including any changes which may occur when the development consent is issued by DPIE for the project, will be provided by Biosis as soon as possible.

Once comments have been received from registered Aboriginal parties (RAPs), these will be incorporated into the final report which will then be issued to all RAPs for their records.

The close of review period for feedback concerning the ACHMP is **5pm on Friday 20 November 2020**.

**All correspondence regarding feedback regarding the CHMP should be provided in writing to:**

**Dr Amanda Markham**  
Biosis Pty Ltd  
Unit 14 17-27 Power Ave,  
Alexandria NSW 2015  
[amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

Yours sincerely,



Dr Amanda Markham  
Senior Archaeologist  
Ph: 0400 988 963

Biosis Pty Ltd  
**Wollongong Resource Group**

8 Tate Street  
Wollongong NSW 2500

Phone: 02 4201 1090  
Fax: 03 9646 9242

ACN 006 175 097  
ABN 65 006 175 097

Email: [wollongong@biosis.com.au](mailto:wollongong@biosis.com.au)

[biosis.com.au](http://biosis.com.au)



4 November 2020

Jody Kulakowski  
Barking Owl Aboriginal Corporation  
2-65/69 Wehlow Street  
Mt Druitt NSW 2770

Dear Jody Kulakowski,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

**Our Ref: Matter 34009**

Biosis Pty Ltd (Biosis) was commissioned by Frasers Property Industrial to produce an Aboriginal Cultural Heritage Management Plan (ACHMP) to manage impacts to Aboriginal heritage during works associated with the Mamre South Precinct development, located in Kemps Creek, New South Wales (NSW). The ACHMP has been prepared to specifically address recommendations issued by Heritage NSW to the Department of Planning, Industry and Environment (DPIE) following an ACHA undertaken by Biosis in 2019.

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**Dr Amanda Markham**  
Biosis Pty Ltd  
Unit 14 17-27 Power Ave,  
Alexandria NSW 2015  
[amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

Yours sincerely,



Dr Amanda Markham  
Senior Archaeologist  
Ph: 0400 988 963

Biosis Pty Ltd  
**Wollongong Resource Group**

8 Tate Street  
Wollongong NSW 2500

Phone: 02 4201 1090  
Fax: 03 9646 9242

ACN 006 175 097  
ABN 65 006 175 097

Email: [wollongong@biosis.com.au](mailto:wollongong@biosis.com.au)

[biosis.com.au](http://biosis.com.au)



4 November 2020

Lee Field  
Barraby Cultural Services  
11 Waterhouse Place  
Airds NSW 2540

Dear Lee Field,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**  
**Our Ref: Matter 34009**

Biosis Pty Ltd (Biosis) was commissioned by Frasers Property Industrial to produce an Aboriginal Cultural Heritage Management Plan (ACHMP) to manage impacts to Aboriginal heritage during works associated with the Mamre South Precinct development, located in Kemps Creek, New South Wales (NSW). The ACHMP has been prepared to specifically address recommendations issued by Heritage NSW to the Department of Planning, Industry and Environment (DPIE) following an ACHA undertaken by Biosis in 2019.

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Biosis Pty Ltd  
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Alexandria NSW 2015  
[amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

Yours sincerely,



Dr Amanda Markham  
Senior Archaeologist  
Ph: 0400 988 963

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Wollongong NSW 2500

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Email: [wollongong@biosis.com.au](mailto:wollongong@biosis.com.au)

[biosis.com.au](http://biosis.com.au)



4 November 2020

Uncle Gordon Workman  
Darug Boorooberongal Elders Aboriginal Corporation  
PO Box 14  
Doonside NSW 2767

Dear Uncle Gordon Workman,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

**Our Ref: Matter 34009**

Biosis Pty Ltd (Biosis) was commissioned by Frasers Property Industrial to produce an Aboriginal Cultural Heritage Management Plan (ACHMP) to manage impacts to Aboriginal heritage during works associated with the Mamre South Precinct development, located in Kemps Creek, New South Wales (NSW). The ACHMP has been prepared to specifically address recommendations issued by Heritage NSW to the Department of Planning, Industry and Environment (DPIE) following an ACHA undertaken by Biosis in 2019.

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Biosis Pty Ltd  
Unit 14 17-27 Power Ave,  
Alexandria NSW 2015  
[amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

Yours sincerely,



Dr Amanda Markham  
Senior Archaeologist  
Ph: 0400 988 963

Biosis Pty Ltd  
**Wollongong Resource Group**

8 Tate Street  
Wollongong NSW 2500

Phone: 02 4201 1090  
Fax: 03 9646 9242

ACN 006 175 097  
ABN 65 006 175 097

Email: [wollongong@biosis.com.au](mailto:wollongong@biosis.com.au)

[biosis.com.au](http://biosis.com.au)



4 November 2020

Marilyn Carroll-Johnson  
Corroborree Aboriginal Corporation  
PO Box 3340  
Rouse Hill NSW 2155

Dear Marilyn Carroll-Johnson,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

**Our Ref: Matter 34009**

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Alexandria NSW 2015  
[amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

Yours sincerely,



Dr Amanda Markham  
Senior Archaeologist  
Ph: 0400 988 963

Biosis Pty Ltd  
**Wollongong Resource Group**

8 Tate Street  
Wollongong NSW 2500

Phone: 02 4201 1090  
Fax: 03 9646 9242

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Email: [wollongong@biosis.com.au](mailto:wollongong@biosis.com.au)

[biosis.com.au](http://biosis.com.au)



4 November 2020

Dirk Schmitt  
Darug Tribal Aboriginal Corporation  
PO box 441  
Blacktown NSW 2148

Dear Dirk Schmitt,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**  
**Our Ref: Matter 34009**

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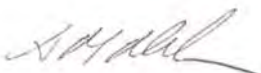
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4 November 2020

Jamie Workman and Anna Workman  
Darug Land Observations  
PO Box 173  
Ulladulla NSW 2539

Dear Jamie Workman and Anna Workman,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

**Our Ref: Matter 34009**

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4 November 2020

Desmond Dyer  
Darug Aboriginal Land Care  
18a Perigee Close  
Doonside NSW 2767

Dear Desmond Dyer,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

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4 November 2020

Lilly and Paul Carrol and Boyd  
Didge Ngunawal Clan  
7 Siskin Street  
Quakers Hill NSW 2763

Dear Lilly and Paul Carrol and Boyd,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

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4 November 2020

Wendy Smith  
Gulaga

Dear Wendy Smith,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

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4 November 2020

Justine Coplin  
Darug Custodian Aboriginal Corporation  
PO Box 81  
Windsor NSW 2756

Dear Justine Coplin,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

**Our Ref: Matter 34009**

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4 November 2020

Jesse Johnson  
Muragadi Heritage Indigenous Corporation  
5 Hession road  
Nelson NSW 2765

Dear Jesse Johnson,

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4 November 2020

Ryan Johnson  
Murra Bidgee Mullangari Aboriginal Corporation  
PO Box 246  
Seven Hills NSW 2147

Dear Ryan Johnson,

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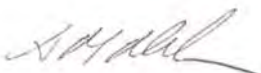
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4 November 2020

Phil Khan  
Kamilaroi-Yankuntjatjara Working Group  
78 Forbes Street  
Emu Plains NSW 2750

Dear Phil Khan,

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4 November 2020

Scott Franks  
Tocomwall  
PO Box 76  
Caringbah NSW 1495

Dear Scott Franks,

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4 November 2020

Steven Randall  
Deerubbin Local Aboriginal Land Council  
PO Box 40  
Penrith NSW 2751

Dear Steven Randall,

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4 November 2020

Vicky Slater  
Kawul Cultural Services  
89 Pyramid Street  
Emu Plains NSW 2750

Dear Vicky Slater,

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4 November 2020

Philip Boney  
Wailwan Aboriginal Digging Group

Dear Philip Boney,

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Kerrie Slater  
Wurrumay Consultancy  
89 Pyramid Street  
Emu Plains NSW 2750

Dear Kerrie Slater,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

**Our Ref: Matter 34009**

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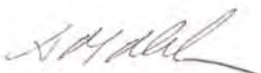
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**Dr Amanda Markham**  
Biosis Pty Ltd  
Unit 14 17-27 Power Ave,  
Alexandria NSW 2015  
[amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

Yours sincerely,



Dr Amanda Markham  
Senior Archaeologist  
Ph: 0400 988 963

Biosis Pty Ltd  
**Wollongong Resource Group**

8 Tate Street  
Wollongong NSW 2500

Phone: 02 4201 1090  
Fax: 03 9646 9242

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ABN 65 006 175 097

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[biosis.com.au](http://biosis.com.au)



4 November 2020

Arika Jalomaki  
Yulay Cultural Services  
15 Rowley Place  
Airds NSW 2560

Dear Arika Jalomaki,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

**Our Ref: Matter 34009**

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4 November 2020

Bo Field  
Yurrandaali Cultural Services  
11 Waterhouse Place  
Airds NSW 2560

Dear Bo Field,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

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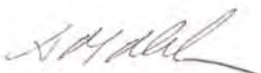
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4 November 2020

Andrew Williams  
Aboriginal Archaeological Service Inc.  
2/24 Goodwin Street  
Narrabeen NSW 2101

Dear Andrew Williams,

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4 November 2020

Jody Kulakowski  
Barking Owl Aboriginal Corporation  
2-65/69 Wehlow Street  
Mt Druitt NSW 2770

Dear Jody Kulakowski,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

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4 November 2020

Lee Field  
Barraby Cultural Services  
11 Waterhouse Place  
Airds NSW 2540

Dear Lee Field,

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4 November 2020

Uncle Gordon Workman  
Darug Boorooberongal Elders Aboriginal Corporation  
PO Box 14  
Doonside NSW 2767

Dear Uncle Gordon Workman,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

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4 November 2020

Marilyn Carroll-Johnson  
Corroborree Aboriginal Corporation  
PO Box 3340  
Rouse Hill NSW 2155

Dear Marilyn Carroll-Johnson,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

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4 November 2020

Dirk Schmitt  
Darug Tribal Aboriginal Corporation  
PO box 441  
Blacktown NSW 2148

Dear Dirk Schmitt,

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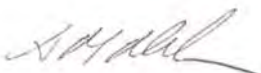
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4 November 2020

Jamie Workman and Anna Workman  
Darug Land Observations  
PO Box 173  
Ulladulla NSW 2539

Dear Jamie Workman and Anna Workman,

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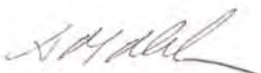
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4 November 2020

Desmond Dyer  
Darug Aboriginal Land Care  
18a Perigee Close  
Doonside NSW 2767

Dear Desmond Dyer,

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**Our Ref: Matter 34009**

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4 November 2020

Lilly Carrol and Paul Boyd  
Didge Ngunawal Clan  
7 Siskin Street  
Quakers Hill NSW 2763

Dear Lilly Carrol and Paul Boyd,

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4 November 2020

Wendy Smith  
Gulaga

Dear Wendy Smith,

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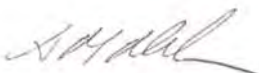
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4 November 2020

Justine Coplin  
Darug Custodian Aboriginal Corporation  
PO Box 81  
Windsor NSW 2756

Dear Justine Coplin,

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**All correspondence regarding feedback regarding the CHMP should be provided in writing to:**

**Dr Amanda Markham**  
Biosis Pty Ltd  
Unit 14 17-27 Power Ave,  
Alexandria NSW 2015  
[amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

Yours sincerely,



Dr Amanda Markham  
Senior Archaeologist  
Ph: 0400 988 963

Biosis Pty Ltd  
**Wollongong Resource Group**

8 Tate Street  
Wollongong NSW 2500

Phone: 02 4201 1090  
Fax: 03 9646 9242

ACN 006 175 097  
ABN 65 006 175 097

Email: [wollongong@biosis.com.au](mailto:wollongong@biosis.com.au)

[biosis.com.au](http://biosis.com.au)



4 November 2020

Jesse Johnson  
Muragadi Heritage Indigenous Corporation  
5 Hession road  
Nelson NSW 2765

Dear Jesse Johnson,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

**Our Ref: Matter 34009**

Biosis Pty Ltd (Biosis) was commissioned by Frasers Property Industrial to produce an Aboriginal Cultural Heritage Management Plan (ACHMP) to manage impacts to Aboriginal heritage during works associated with the Mamre South Precinct development, located in Kemps Creek, New South Wales (NSW). The ACHMP has been prepared to specifically address recommendations issued by Heritage NSW to the Department of Planning, Industry and Environment (DPIE) following an ACHA undertaken by Biosis in 2019.

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Yours sincerely,



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4 November 2020

Ryan Johnson  
Murra Bidgee Mullangari Aboriginal Corporation  
PO Box 246  
Seven Hills NSW 2147

Dear Ryan Johnson,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**  
**Our Ref: Matter 34009**

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Ph: 0400 988 963

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4 November 2020

Phil Khan  
Kamilaroi-Yankuntjatjara Working Group  
78 Forbes Street  
Emu Plains NSW 2750

Dear Phil Khan,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

**Our Ref: Matter 34009**

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4 November 2020

Scott Franks  
Tocomwall  
PO Box 76  
Caringbah NSW 1495

Dear Scott Franks,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**  
**Our Ref: Matter 34009**

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4 November 2020

Steven Randall  
Deerubbin Local Aboriginal Land Council  
PO Box 40  
Penrith NSW 2751

Dear Steven Randall,

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4 November 2020

Vicky Slater  
Kawul Cultural Services  
89 Pyramid Street  
Emu Plains NSW 2750

Dear Vicky Slater,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

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Yours sincerely,



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Ph: 0400 988 963

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4 November 2020

Philip Boney  
Wailwan Aboriginal Digging Group

Dear Philip Boney,

**RE: Review of draft Aboriginal cultural heritage management plan: Mamre South Precinct development located at 657-769 Mamre Road, Kemps Creek**

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4 November 2020

Kerrie Slater  
Wurrumay Consultancy  
89 Pyramid Street  
Emu Plains NSW 2750

Dear Kerrie Slater,

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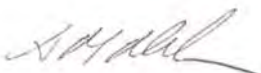
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Ph: 0400 988 963

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4 November 2020

Arika Jalomaki  
Yulay Cultural Services  
15 Rowley Place  
Airds NSW 2560

Dear Arika Jalomaki,

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4 November 2020

Bo Field  
Yurrandaali Cultural Services  
11 Waterhouse Place  
Airds NSW 2560

Dear Bo Field,

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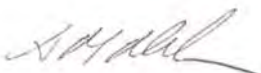
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**From:** jesse johnson <muragadi@yahoo.com.au>  
**Sent:** Wednesday, 18 November 2020 6:44 AM  
**To:** Ashley Bridge  
**Subject:** Re: 34009 - Mamre South ACHMP - draft report - community consultaon  
**A achments:** 34009.Draft.ACHMP.DFT01\_12.pdf

Hi Ashley

I have read the project information and draft ACHMP for the above project, I agree with the recommendations made.

Kind regards

Jesse Johnson

On Wednesday, 4 November 2020, 12:28:59 pm AEDT, Ashley Bridge wrote:

Hi Jesse,

Further to your registration of interest for the Mamre South Precinct development Aboriginal Cultural Heritage Management Plan (ACHMP) project, Biosis is assisting Frasers Property Industrial with consultation with the Aboriginal community, in accordance with the recommendations provided by Heritage NSW.

Please find a hyperlink to the draft ACHMP below, in addition to a cover letter for the project attached to this email.

<https://spaces.hightail.com/receive/5STw8QZ5A8>

If you could please provide comment on this document by **5pm on Friday 20 November 2020**, it would be greatly appreciated.

All correspondence regarding feedback on the ACHMP should be provided in writing to **Dr. Amanda Markham**. Her contact details can be found in the attached cover letter.

Kind regards,

**Ashley Bridge**  
Archaeologist  
M: 0437 689 734  
D: (02) 9101 8721  
E: [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



Leaders in Ecology and Heritage Consulting

**Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work. We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and ongoing contribution to society.**

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**From:** [Ashleigh Keevers-Eastman](#)  
**To:** [Taryn Gooley](#); [Amanda Markham](#)  
**Subject:** Fwd: Mamre Road Salvage - High density deposit identified (SSD 9522)  
**Date:** Friday, 19 March 2021 3:56:34 PM  
**Attachments:** [image001.png](#)  
[image93df89.PNG](#)

---

Sent from my SAMSUNG Galaxy S7 on the Telstra Mobile Network

----- Original message -----

**From:** Claire Rayner <[claire.rayner@environment.nsw.gov.au](mailto:claire.rayner@environment.nsw.gov.au)>  
**Date:** 19/3/21 3:48 pm (GMT+10:00)  
**To:** Ashleigh Keevers-Eastman <[AKeevers-Eastman@biosis.com.au](mailto:AKeevers-Eastman@biosis.com.au)>  
**Subject:** Mamre Road Salvage - High density deposit identified (SSD 9522)

Dear Ashleigh,

I have reviewed your email sent to Sam Higgs regarding the high density deposit identified in Kemps Creek during salvage excavations for the Kemps Creek Warehouse, Logistics and Industrial Facilities Hub (SSD 9522). I have also reviewed the ACHMP and the Conditions of Consent.

Additional manual excavation may be undertaken outside of the 10x10 metres specified in the ACHMP to be excavated within AHIMS sites #45-5-5188 and #45-5-5189. This excavation should be conducted in accordance with the methodology outlined in Section 5.1.7.2 of the ACHMP.

Mechanical excavation may not replace manual excavation and should only be undertaken once a comprehensive salvage of AHIMS sites #45-5-5188 and #45-5-5189 has been completed. Collection of Aboriginal objects during monitoring of mechanical excavation should follow the protocols for surface collection of artefacts outlined in Section 5.1.7.3 of the ACHMP.

Please contact me if you require any further information or clarification.

Kind regards,

**Claire Rayner | Archaeologist, Aboriginal Cultural Heritage Regulation**

Heritage NSW, Community Engagement, Department of Premier and Cabinet

Level 6, 10 Valentine Avenue, Parramatta NSW 2135

T: (02) 8289 6709 | [claire.rayner@environment.nsw.gov.au](mailto:claire.rayner@environment.nsw.gov.au)



**Premier  
& Cabinet**

*I acknowledge and respect the traditional custodians and ancestors of the lands I work across.*



-----  
-----  
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If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment and Heritage.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

**Ashleigh Keevers-Eastman**

Project Archaeologist

M: 0428 175 025

D: (02) 4911 4042

E: [akeevers-eastman@biosis.com.au](mailto:akeevers-eastman@biosis.com.au)



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Bianca Thornton  
Environmental Assessment Officer  
Energy Resource Assessment  
Department of Planning, Industry & Environment  
By email: Bianca.Thornton@planning.nsw.gov.au

Your reference: SSD-9522-Mod-1  
Our reference: DOC21/538934

Dear Bianca,

**Response to Submissions for Kemps Creek Warehouse, Logistics and Industrial Facilities Hub Modification-1 (SSD-9522-Mod-1).**

Thank you for your referral dated 30 June 2021 inviting comments from Heritage NSW on the above State Significant Infrastructure Response to Submissions (RtS). Heritage NSW has reviewed the available supporting documentation and provides comment for the proposed development in relation to Aboriginal cultural heritage regulation matters below.

The following reports were considered in our assessment:

- Modification Application Planning Report – Section 4.55(2) Modification to SSD 9522 – Proposed Warehouse, Logistics and Industrial Facilities Hub – SSD 9522 MOD 1, prepared by WillowTree Planning Pty Ltd, dated April 2021.
- Appendix 15: Mamre South Precinct State Significance Development – Proposed Warehouse, Logistics and Industrial Facilities Hub: Archaeological Report, prepared by Biosis Pty Ltd, dated November 2020.
- Appendix 16: Mamre South Precinct State Significance Development – Proposed Warehouse, Logistics and Industrial Facilities Hub: Aboriginal Cultural Heritage Assessment Report, prepared by Biosis Pty Ltd, dated November 2020.
- SSD-9522-MOD-1: Response to Submissions (RtS), prepared by WillowTree Planning Pty Ltd, dated June 2021.

**Response to Submission**

Heritage NSW's submission to the Modification Application for SSD-9522 recommended that the proponent provide documentation demonstrating compliance with Conditions B56-63 of Approval, namely an Aboriginal Cultural Heritage Management Plan (ACHMP) and an Unexpected Finds Protocol. An ACHMP has not been provided in the RtS. Rather, it was provided outside of the Major Projects Portal during consultation with HNSW on proposed changes to the ACHMP. While it has not been formally submitted, Heritage NSW has reviewed the ACHMP. Heritage NSW notes that the Modification Application and RtS state that there will be no changes to the Aboriginal Cultural Heritage Conditions for SSD-9522 (RtS Table 5: Response Matrix).

Heritage NSW recommends modifications and clarification in several sections of the ACHMP:

**1) Recommendations**

- a) Prepare a methodology outlining when Registered Aboriginal Parties (RAPs) must be notified of changes to the Heritage Management Plan;



- i) A contingency plan and reporting procedure must be prepared for if the Unexpected Heritage Finds procedure and Human Remains Procedure are enacted, and if conditions of this ACHMP are breached;
- b) Ongoing consultation with RAPs during the implementation of the plan;
- c) At the completion of Aboriginal cultural heritage test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report(s), prepared by a suitable qualified expert. The Aboriginal Cultural Heritage Excavation Report(s), must:
  - i) Be prepared in accordance with the *Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW*, OEH 2011 and the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, DECCW 2010;
  - ii) Document the results of the archaeological test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds);
    - (1) Details on the artefact attributes to be recorded must be included in the ACHMP; and
  - iii) The RAPs must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, and the relevant Local Aboriginal Land Council, and the RAPs within 24 months of the completion of the Aboriginal archaeological collections and excavations (both test and salvage).

## 2) Clarification

- a) It is unclear how and when mechanical excavation will be conducted during salvage excavations (ACHMP Section 5.1.3.2), nor the method of mechanical excavation;
- b) Site boundaries must be clearly demarcated in ACHMP mapping, and where possible include GPS locations of the boundary;
- c) Mapping should outline what test units in MSP-02 and MSP-03 will be subject to salvage and, potentially, expansion;
- d) The unexpected finds flowchart must be updated with the current Agency title – Heritage NSW; and
- e) Maximum excavation dimensions should be adjusted from 10 x 10 m to 100m<sup>2</sup> to enable flexibility in the salvage methodology.

## **Modification to the Aboriginal Cultural Heritage Management Plan (ACHMP)**

A separate request for advice from Biosis (archaeological consultant) was made to Heritage NSW for a proposed ACHMP modification. Specifically, changes to the management of AHIMS site #45-4-5346 (MSP-11), outlined in Environmental Mitigation Measures Strategies 8-9 of the ACHMP and Conditions of Approval for SSD-9522. The proposed changes to the ACHMP involve the installation of a stormwater drain through the site with a works corridor width of 30 m to a depth of 3.5 m. As this is a change to the ACHMP and management of MSP-11 and is in direct opposition to SSD-9522 Conditions as outlined in the Modification Application, Heritage NSW advises that they will reserve comment on the proposed ACHMP changes when the Department of Planning, Industry and Environment formally requests this of Heritage NSW. Until such time, Heritage NSW advises that the proponent must comply with the current management strategies outlined in the ACHMP.



If you have any questions regarding the above advice, please contact Corey O'Driscoll, Archaeological at Heritage NSW Heritage Regulation North on 6229 7079 or [corey.odriscoll@environment.nsw.gov.au](mailto:corey.odriscoll@environment.nsw.gov.au).

Yours sincerely



**Dr. Samantha Higgs**  
**Senior Team Leader**  
**Aboriginal Cultural Heritage Regulations - North**  
**Heritage NSW**  
**Department of Premier and Cabinet**  
**16 July 2021**



5 August 2021

Corey O'Driscoll  
Archaeologist  
Heritage NSW, Department of Premier and Cabinet  
Level 3, 11 Farrer Place  
Queanbeyan NSW 2620

Dear Corey

**Re: Response to Submissions for Kemps Creek Warehouse, Logistics and Industrial Facilities Hub Modification-1 (SSD-9522-Mod-1).**

**Our Ref: Matter34009**

Please find below responses to additional information requested on 16 July 2021.

**Requested information**

*Prepare a methodology outlining when Registered Aboriginal Parties (RAPs) must be notified of changes to the Heritage Management Plan*

**Biosis response**

See Section 8.2 for a revision and amendment strategy, and Section 5.12.1 regarding the RAP consultation plan.

**Requested information**

*A contingency plan and reporting procedure must be prepared for if the Unexpected Heritage Finds procedure and Human Remains Procedure are enacted, and if conditions of this ACHMP are breached.*

**Biosis response**

See sections 5.1.1, 5.1.13, 5.1.14, Section 6.3, Section 6.4, Appendix A, Appendix B and Appendix E of the CHMP for all relevant information, contingency plans and procedures relating to unexpected heritage finds, human remains and breaches of the ACHMP.

**Requested information**

*Ongoing consultation with RAPs during the implementation of the plan.*

**Biosis response**

See Section 5.1.12 and Appendix D outlining ongoing consultation undertaken to date.

Biosis Pty Ltd  
**Sydney**

Unit 14, 17-27 Power Avenue  
Alexandria NSW 2015

Phone: 02 9101 8700

ACN 006 175 097  
ABN 65 006 175 097

Email: [sydney@biosis.com.au](mailto:sydney@biosis.com.au)

[biosis.com.au](http://biosis.com.au)



### **Requested information**

*At the completion of Aboriginal cultural heritage test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report(s), prepared by a suitable qualified expert. The Aboriginal Cultural Heritage Excavation Report(s), must:*

- *Be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, OEH 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010;*
- *Document the results of the archaeological test excavations and any subsequent salvage excavations with artefact analysis and identification of a final repository for finds (Details on the artefact attributes to be recorded must be included in the ACHMP).*
- *The RAPs must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, and the relevant Local Aboriginal Land Council, and the RAPs within 24 months of the completion of the Aboriginal archaeological collections and excavations (both test and salvage).*

### **Biosis response**

See section 5.1.7.5 of CHMP.

### **Requested information**

*It is unclear how and when mechanical excavation will be conducted during salvage excavations (CHMP Section 5.1.7.2), nor the method of mechanical excavation.*

### **Biosis response**

See sections 5.1.7.3 and 5.1.8 of CHMP.

### **Requested information**

*Site boundaries must be clearly demarcated in CHMP mapping, and where possible include GPS locations of the boundary;*

### **Biosis response**

See Figure 5 in the CHMP.

### **Requested information**

*Mapping should outline what test units in MSP-02 and MSP-03 will be subject to salvage and, potentially, expansion*

### **Biosis response**

See Figure 5 in the CHMP.

### **Requested information**

*The unexpected finds flowchart must be updated with the current Agency title – Heritage NSW*



### **Biosis response**

Unexpected finds flowchart has been updated. See Section 5.1.13, Figure 6.

### **Requested information**

*Maximum excavation dimensions should be adjusted from 10 x 10 m to 100m<sup>2</sup> to enable flexibility in the salvage methodology.*

### **Biosis response**

Maximum excavation dimensions have been adjusted in the CHMP from 10 x 10 metres of total excavations to 100 metres squared of total test excavations.

Please contact Amanda Markham on [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au) if you have any enquiries.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M. Smith'.

Mathew Smith  
Consultant Archaeologist



**From:** [Amanda Markham](#)  
**To:** ["heritagemailbox@environment.nsw.gov.au"](mailto:heritagemailbox@environment.nsw.gov.au)  
**Cc:** [Ashleigh Keevers-Eastman](#)  
**Subject:** ATTN: Sam Higgs DOC/709627-8  
**Date:** Thursday, 20 May 2021 3:54:35 PM  
**Attachments:** [SSD-9522 Consent.pdf](#)  
[32012.Mamre\\_MSP-11.Mitigation.Methodology.DFT02.20200517.pdf](#)  
[34009.CHMP.Mamre.South.Precinct.FIN03.20210322.pdf](#)  
[image4cb744.PNG](#)  
**Importance:** High

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Hi Sam,

I'm writing to you seeking advice regarding 657-769 Mamre Road, Kemps Creek SSD9522(attached). We previously sought your advice for the ACHMP (attached) and salvage works for this project. In particular, I am seeking advice on 45-5-5346 (MSP-11), referred to in condition B59 (e) and within the ACHMP, Strategy 9.

Fraser's Property Industrial (the client) have advised that they need to put a stormwater drain through a portion of this site. On Wednesday 12 May, RAPs and Biosis staff undertook an inspection of the proposed route. Previous testing in the area of the proposed stormwater drain undertaken for the ACHA to support the SSD application resulted in no artefacts being recovered. RAPs advised that they did not wish for any further testing or archaeological investigations to take place, and instead, suggested we seek to vary the ACHMP and management of 45-5-5346 (MSP-11) via a works mitigation methodology.

To this end, we have written a methodology, and are seeking your advice as to the best way to proceed as the update to the ACHMP will require DPIE's assessment under the Conditions of Consent.

Please note that I will be on leave from 21/5/2021 and Ashleigh Keevers-Eastman will be overseeing this project in my place.

Many thanks,

Amanda

**Dr Amanda Markham**

Senior Archaeologist

M: 0400 988 963

D: (02) 9101 8719

E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

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**From:** [Nailem Teghlobi](#)  
**To:** [Amanda Markham](#); [Michaela Leerdam](#)  
**Cc:** [Taryn Gooley](#); [Ashleigh Keevers-Eastman](#)  
**Subject:** RE: Draft MSP-11.Mitigation.Methodology  
**Date:** Thursday, 20 May 2021 2:23:19 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi Amanda

Below is comment received from AWJ. Please finalise the report taking their comments into consideration. Let me know when you can submit to RAPs to commence the 14 day review period.

*The processes outlined in the report are consistent with site discussions.*

*My only concerns are the following points,*

*Item 3 - coordinates for item 3 and a map would be appreciated so we can physically fence off the area*

*Item 4 & 5 – Please clarify what is involved in an ACHA and any implications on the project, ie delays?*

*I would suggest starting this as soon as possible to avoid potential delays to SW installation if significant artifacts are encountered.*



Regards,

NT

---

**From:** Amanda Markham  
**Sent:** Tuesday, 18 May 2021 4:32 PM  
**To:** Nailem Teghlobi ; Michaela Leerdam  
**Cc:** Taryn Gooley ; Ashleigh Keevers-Eastman  
**Subject:** Draft MSP-11.Mitigation.Methodology

**EXTERNAL EMAIL:** Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Nailem & Michaela,

Please find attached the draft MSP-11 Works Mitigation Methodology for your comment.

I am sending a copy to the RAPs who were out on site with Ash Keevers-Eastman last week, and



will ask them for feedback as well. Once I've received feedback and made changes, I'll send to all RAPs with a time limit of 14 days for comment.

Cheers

Amanda

**Dr Amanda Markham**

Senior Archaeologist

M: 0400 988 963

D: (02) 9101 8719

E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

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**From:** [Amanda Markham](#)  
**To:** ["Naïem Teghlobi"](#); [Michaela Leerdam](#)  
**Cc:** [Taryn Gooley](#); [Ashleigh Keevers-Eastman](#)  
**Subject:** RE: Draft MSP-11.Mitigation.Methodology  
**Date:** Thursday, 20 May 2021 3:12:30 PM  
**Attachments:** [image004.png](#)  
[32012\\_Data\\_package\\_190421.zip](#)  
[image001.png](#)

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Hi Naïem,

I'm waiting on one last RAP comment to come back, and then I'll finalise and send out to RAPs. If I haven't heard anything by 3:30pm, I'll call the RAP and ask if he's got any comments.

Item 3: I've attached a folder with the shape files that include the AHIMS sites and boundaries. Please have a look and let me know if these are ok.

Items 4 & 5. The extract below is from the current ACHMP. The purpose of the mitigation methodology is to alter the ACHMP in relation to Strategy 9 so that a new ACHA is not required and we've demonstrated to Heritage NSW and DPIE that we've consulted with RAPs on this. We still need Heritage NSW's input – I have not had a response from Sam Higgs on this yet and have left several requests for her to call me, beginning with Wednesday last week. I will now write an email to the NSW Heritage mailbox address and mark it urgent.

**Leave:**

I am taking annual leave from tomorrow until 21 June. In my absence, Ashleigh Keevers-Eastman will be the main project contact. I will leave handover notes for the project with Ash.

Cheers

Amanda

---

**From:** Naïem Teghlobi  
**Sent:** Thursday, 20 May 2021 2:23 PM  
**To:** Amanda Markham ; Michaela Leerdam  
**Cc:** Taryn Gooley ; Ashleigh Keevers-Eastman  
**Subject:** RE: Draft MSP-11.Mitigation.Methodology

Hi Amanda

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*I would suggest starting this as soon as possible to avoid potential delays to SW installation if significant artifacts are encountered.*



cid:image001.png@01D74D83.A57A9E10



Regards,  
NT

---

**From:** Amanda Markham <[AMarkham@biosis.com.au](mailto:AMarkham@biosis.com.au)>

**Sent:** Tuesday, 18 May 2021 4:32 PM

**To:** Naiem Teghlobi <[Naiem.Teghlobi@frasersproperty.com.au](mailto:Naiem.Teghlobi@frasersproperty.com.au)>; Michaela Leerdam <[Michaela.Leerdam@frasersproperty.com.au](mailto:Michaela.Leerdam@frasersproperty.com.au)>

**Cc:** Taryn Gooley <[TGooley@biosis.com.au](mailto:TGooley@biosis.com.au)>; Ashleigh Keevers-Eastman <[AKeevers-Eastman@biosis.com.au](mailto:AKeevers-Eastman@biosis.com.au)>

**Subject:** Draft MSP-11.Mitigation.Methodology

**EXTERNAL EMAIL:** Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Naiem & Michaela,

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Cheers

Amanda

**Dr Amanda Markham**

Senior Archaeologist

M: 0400 988 963

D: (02) 9101 8719

E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

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**From:** [Amanda Markham](#)  
**To:** ["justinecoplin@optusnet.com.au"](mailto:justinecoplin@optusnet.com.au)  
**Subject:** RE: Mamre Draft MSP-11 Works Mitigation Methodology  
**Date:** Wednesday, 19 May 2021 1:38:10 PM  
**Attachments:** [image001.png](#)

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Hi Justine,

Thanks for getting back to me – I'll make the changes to the methodology about the fencing. Late last week, the client fenced off the portion of MSP-02 (where the 30K+ artefacts came from) that isn't going to be impacted by the works.

Cheers

Amanda

---

**From:** justinecoplin@optusnet.com.au  
**Sent:** Wednesday, 19 May 2021 1:35 PM  
**To:** Amanda Markham  
**Subject:** RE: Mamre Draft MSP-11 Works Mitigation Methodology

Afternoon

That looks good, maybe instead of star pickets, they could put up temporary fencing while works are going on as a machine can wipe out star pickets, temp fencing isn't so easy.

The area that the 1000s of artefacts came out of are the fencing that off.

Thanks

Justine

---

**From:** Amanda Markham <[AMarkham@biosis.com.au](mailto:AMarkham@biosis.com.au)>  
**Sent:** Tuesday, 18 May 2021 4:37 PM  
**To:** 'justinecoplin@optusnet.com.au' <[justinecoplin@optusnet.com.au](mailto:justinecoplin@optusnet.com.au)>  
**Subject:** Mamre Draft MSP-11 Works Mitigation Methodology

Hi Justine,

Thanks for going out on site with Ash last week. I've attached a copy of the draft works mitigation strategy for you to have a look at and check that it reflects what was discussed. It's currently addressed to the client, but once finalised, we'll change the addresses to send out to all Registered Aboriginal Parties for consideration. Please let me know if you have any changes, additions or corrections you'd like me to make.

Cheers

Amanda

**Dr Amanda Markham**  
Senior Archaeologist  
M: 0400 988 963  
D: (02) 9101 8719  
E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)  
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**From:** [justinecoplin@optusnet.com.au](mailto:justinecoplin@optusnet.com.au)  
**To:** [Amanda Markham](#)  
**Subject:** RE: Mamre Draft MSP-11 Works Mitigation Methodology  
**Date:** Wednesday, 19 May 2021 1:34:36 PM  
**Attachments:** [image001.png](#)

---

Afternoon

That looks good, maybe instead of star pickets , they could but up temporary fencing while works are going on as a machine can wipe out star pickets , temp fencing isn't so easy.

The area that the 1000s of artefacts came out of are the fencing that off .

Thanks

Justine

---

**From:** Amanda Markham  
**Sent:** Tuesday, 18 May 2021 4:37 PM  
**To:** 'justinecoplin@optusnet.com.au'  
**Subject:** Mamre Draft MSP-11 Works Mitigation Methodology

Hi Justine,

Thanks for going out on site with Ash last week. I've attached a copy of the draft works mitigation strategy for you to have a look at and check that it reflects what was discussed. It's currently addressed to the client, but once finalised, we'll change the addresses to send out to all Registered Aboriginal Parties for consideration. Please let me know if you have any changes, additions or corrections you'd like me to make.

Cheers

Amanda

**Dr Amanda Markham**

Senior Archaeologist

M: 0400 988 963

D: (02) 9101 8719

E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

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**From:** [Corey O'Driscoll](#)  
**To:** [Amanda Markham](#)  
**Cc:** [Bianca Thornton](#)  
**Subject:** RE: Kemps Creek Warehouse Mod 1 (SSD-9522-Mod-1) and ACHMP changes  
**Date:** Wednesday, 28 July 2021 2:30:02 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi Amanda,

It is best to address it in the ACHMP, though it won't hurt to have a section/appendix that outlines the sections of the ACHMP that have addressed the below requests for clarification.

Kind regards,

Corey.

**Corey O'Driscoll | Archaeologist, Aboriginal Cultural Heritage Regulation**

Heritage NSW, Community Engagement, Department of Premier and Cabinet  
Level 3, 11 Farrer Place, Queanbeyan NSW 2620  
T: 02 62297079 | [Corey.ODriscoll@environment.nsw.gov.au](mailto:Corey.ODriscoll@environment.nsw.gov.au)



**Premier  
& Cabinet**

*I acknowledge and respect the traditional custodians and ancestors of the lands I work across.*

**Heritage NSW and coronavirus (COVID-19)**

Heritage NSW has taken steps to protect the safety, health and wellbeing of our staff, communities and customers. Whilst our offices remain open, we have put in place flexible working arrangements for our teams across NSW and continue to adapt our working arrangements as necessary. Face-to-face meetings and field work/site visits with our customers are subject to rules on gatherings and social distancing measures. We thank you for your patience and understanding at this time.

---

**From:** Amanda Markham <AMarkham@biosis.com.au>  
**Sent:** Wednesday, 28 July 2021 2:27 PM  
**To:** Corey O'Driscoll <Corey.ODriscoll@environment.nsw.gov.au>  
**Cc:** Bianca Thornton <Bianca.Thornton@planning.nsw.gov.au>  
**Subject:** RE: Kemps Creek Warehouse Mod 1 (SSD-9522-Mod-1) and ACHMP changes

Hi Corey,

Many thanks for this update. We'll get working on the ACHMP. Would you be able to let me know if you require a letter from Biosis outlining the clarifications and explications before Frasers lodge the ACHMP or is it best to just address it in the ACHMP?

Thanks

Amanda

**Dr Amanda Markham**  
Senior Archaeologist

M: 0400 988 963  
D: (02) 9101 8719



E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)



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**From:** Corey O'Driscoll <[Corey.ODriscoll@environment.nsw.gov.au](mailto:Corey.ODriscoll@environment.nsw.gov.au)>

**Sent:** Wednesday, 28 July 2021 2:04 PM

**To:** Amanda Markham <[AMarkham@biosis.com.au](mailto:AMarkham@biosis.com.au)>

**Cc:** Bianca Thornton <[Bianca.Thornton@planning.nsw.gov.au](mailto:Bianca.Thornton@planning.nsw.gov.au)>

**Subject:** Kemps Creek Warehouse Mod 1 (SSD-9522-Mod-1) and ACHMP changes

Hi Amanda,

Thanks for your time over the last few days. DPIE have advised Frasers that the MOD 1 assessment is separate from the changes to the ACHMP, however the ACHMP must be lodged, after which Heritage NSW will advise DPIE on the changes made.

During an initial assessment of the ACHMP (pre-lodgement) provided via email, there were several sections that would benefit from clarification and explication prior to lodgement. These include:

- a. Further justification for the placement of the stormwater pipe through MSP-11, details on other possible alignments for the stormwater drain, and alternative conservation measures for ACH within the project boundary are required;
- b. If the works corridor can be reduced from 30 metres in width;
- c. Methodology for further test excavations along the proposed stormwater pipe alignment;
- d. Methodology for salvage excavations following the completion of test excavations; and
- e. Methodology for grader scrapes and artefact collection.

Please do not hesitate to contact me if you have any further questions.

Kind regards,

Corey.

**Corey O'Driscoll | Archaeologist, Aboriginal Cultural Heritage Regulation**

Heritage NSW, Community Engagement, Department of Premier and Cabinet

Level 3, 11 Farrer Place, Queanbeyan NSW 2620

T: 02 62297079 | [Corey.ODriscoll@environment.nsw.gov.au](mailto:Corey.ODriscoll@environment.nsw.gov.au)





Premier  
& Cabinet

*I acknowledge and respect the traditional custodians and ancestors of the lands I work across.*

**Heritage NSW and coronavirus (COVID-19)**

Heritage NSW has taken steps to protect the safety, health and wellbeing of our staff, communities and customers. Whilst our offices remain open, we have put in place flexible working arrangements for our teams across NSW and continue to adapt our working arrangements as necessary. Face-to-face meetings and field work/site visits with our customers are subject to rules on gatherings and social distancing measures. We thank you for your patience and understanding at this time.

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5 August 2021

Corey O'Driscoll  
Archaeologist  
Heritage NSW, Department of Premier and Cabinet  
Level 3, 11 Farrer Place  
Queanbeyan NSW 2620

Dear Corey

**Re: Kemps Creek Warehouse Mod 1 (SSD-9522-Mod-1) and ACHMP changes**  
**Our Ref: Matter34009**

Please find below responses to additional information requested in the email dated 28 July 2021.

**Requested information**

*Further justification for the placement of the stormwater pipe through MSP-11, details on other possible alignments for the stormwater drain, and alternative conservation measures for ACH within the project boundary are required.*

**Biosis Response:**

The following information has been provided by Frasers to address the above response:

- The stormwater outlet follows the line of the natural falls and watercourse on the land. The MSP-11 area is noted to cover a significant area west of the development land and extends between the southern boundaries to Bakers Lane.
- Alternate routes around the MSP-11 area is not achievable for the development. An alternate route for the outlet to go around the MSP-11 area would result in:
  - The development not being able to drain by gravity (without significant increase in the levels of the site to enable gravity drainage – not acceptable to Council or the terms of the approval and will constitute greater impacts to Aboriginal heritage than the current proposal).
  - The low point of the development not being able to be drained.
  - The outlet would no longer follow the natural fall of the land (which would not be acceptable from NRAR and the approved outlet location).

**Requested information**

*If the works corridor can be reduced from 30 metres in width?*

**Biosis Response:**

The following information has been provided by Frasers to address the above response:

Biosis Pty Ltd  
**Sydney**



- In relation to the anticipated works zone, this would generally be confined to a 20 metre width and less than 30 metre in width along the drainage corridor. Some localised zones for machinery turn around would be required which would be less than 30 metres but greater than 20 metres. The 20 metre works corridor needs to also consider requirements for machinery movement, trenching and spoil management adjacent to the trench which is why a 30 metre zone has been anticipated.

### **Requested information**

*Methodology for further test excavations along the proposed stormwater pipe alignment.*

#### **Biosis Response:**

During the testing program documented in the AR (Biosis, 2020c), AHIMS 45-5-5346 (MSP-11) was found to be a low density subsurface artefact scatter. Subsequent consultation with RAPs regarding a proposed stormwater drain through a small portion of the site recommended no that further test excavations were needed to characterise the site. RAPs requested a program of mechanical excavation and monitoring along the stormwater drain's corridor. A methodology for undertaking mechanical excavation and monitoring is provided within the CHMP in 5.1.8 'Strategy 8: A strategy for mitigating impacts during development works for Aboriginal site #45-5-5346 (MSP-11)'.

A test excavation methodology was provided in 5.1.7 'Strategy 7: Procedure for undertaking additional archaeological investigations and/or salvage measures' of the CHMP and 'MSP-11 operational works mitigation strategy' provided to RAPs on the 25 May 2021. As per the CHMP and mitigation strategy, and in accordance with best practice and the consultation undertaken, this methodology would be used for any further test excavations undertaken in MSP-11. This methodology would also ensure results are obtained in a format that is consistent with previous excavations allowing comparative analysis to be undertaken. If higher density artefact concentrations are found, then the salvage methodology in line with Strategy 7: Procedure for undertaking additional archaeological investigations and/or salvage measures the CHMP will be followed.

### **Requested information**

*Methodology for salvage excavations following the completion of test excavations.*

#### **Biosis Response:**

During the testing program documented in the AR (Biosis, 2020c), AHIMS 45-5-5346 (MSP-11) was found to be a low density subsurface artefact scatter. Subsequent consultation with RAPs regarding a proposed stormwater drain through a small portion of the site recommended no that further test excavations were needed to characterise the site. RAPs requested a program of mechanical excavation and monitoring along the stormwater drain's corridor. A salvage excavation methodology was provided in section 5.1.7 'Strategy 7: Procedure for undertaking additional archaeological investigations and/or salvage measures' of the CHMP and MSP-11 operational works mitigation strategy provided to RAPs on the 25 May 2021. As per the CHMP and mitigation strategy and in accordance with best practice and consultation undertaken, this methodology would be used for any further salvage excavations undertaken in MSP-11. . If higher density artefact concentrations are found, then the salvage methodology in line with Strategy 7: Procedure for undertaking additional archaeological investigations and/or salvage measures the CHMP will be followed.



## Requested information

*Methodology for grader scrapes and artefact collection.*

### Biosis Response:

A methodology for grader scrapes and artefact collection was provided in section 5.1.7 'Strategy 7: Procedure for undertaking additional archaeological investigations and/or salvage measures' of the ACHMP and the MSP-11 operational works mitigation strategy provided to RAPs on the 25 May 2021. As per the ACHMP and mitigation strategy and in accordance with best practice and consultation undertaken, this methodology would be used for any additional works undertaken in MSP-11. . If higher density artefact concentrations are found, then the salvage methodology in line with Strategy 7: Procedure for undertaking additional archaeological investigations and/or salvage measures the CHMP will be followed.

Please contact Amanda Markham on [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au) if you have any enquiries.

Yours sincerely

A small, handwritten signature in blue ink, appearing to read 'MSmith'.

Mathew Smith  
Consultant Archaeologist



**From:** [Amanda Markham](#)  
**To:** ["heritagemailbox@environment.nsw.gov.au"](mailto:heritagemailbox@environment.nsw.gov.au)  
**Cc:** [Ashleigh Keevers-Eastman](#)  
**Subject:** ATTN: Sam Higgs DOC/709627-8  
**Date:** Thursday, 20 May 2021 3:54:35 PM  
**Attachments:** [SSD-9522 Consent.pdf](#)  
[32012.Mamre\\_MSP-11.Mitigation.Methodology.DFT02.20200517.pdf](#)  
[34009.CHMP.Mamre.South.Precinct.FIN03.20210322.pdf](#)  
[image4cb744.PNG](#)  
**Importance:** High

---

Hi Sam,

I'm writing to you seeking advice regarding 657-769 Mamre Road, Kemps Creek SSD9522(attached). We previously sought your advice for the ACHMP (attached) and salvage works for this project. In particular, I am seeking advice on 45-5-5346 (MSP-11), referred to in condition B59 (e) and within the ACHMP, Strategy 9.

Fraser's Property Industrial (the client) have advised that they need to put a stormwater drain through a portion of this site. On Wednesday 12 May, RAPs and Biosis staff undertook an inspection of the proposed route. Previous testing in the area of the proposed stormwater drain undertaken for the ACHA to support the SSD application resulted in no artefacts being recovered. RAPs advised that they did not wish for any further testing or archaeological investigations to take place, and instead, suggested we seek to vary the ACHMP and management of 45-5-5346 (MSP-11) via a works mitigation methodology.

To this end, we have written a methodology, and are seeking your advice as to the best way to proceed as the update to the ACHMP will require DPIE's assessment under the Conditions of Consent.

Please note that I will be on leave from 21/5/2021 and Ashleigh Keevers-Eastman will be overseeing this project in my place.

Many thanks,

Amanda

**Dr Amanda Markham**

Senior Archaeologist

M: 0400 988 963

D: (02) 9101 8719

E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

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**From:** [Naïem Teghlobi](#)  
**To:** [Amanda Markham](#); [Michaela Leerdam](#)  
**Cc:** [Taryn Gooley](#); [Ashleigh Keevers-Eastman](#)  
**Subject:** RE: Draft MSP-11.Mitigation.Methodology  
**Date:** Thursday, 20 May 2021 2:23:19 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Hi Amanda

Below is comment received from AWJ. Please finalise the report taking their comments into consideration. Let me know when you can submit to RAPs to commence the 14 day review period.

*The processes outlined in the report are consistent with site discussions.*

*My only concerns are the following points,*

*Item 3 - coordinates for item 3 and a map would be appreciated so we can physically fence off the area*

*Item 4 & 5 – Please clarify what is involved in an ACHA and any implications on the project, ie delays?*

*I would suggest starting this as soon as possible to avoid potential delays to SW installation if significant artifacts are encountered.*



Regards,

NT

---

**From:** Amanda Markham  
**Sent:** Tuesday, 18 May 2021 4:32 PM  
**To:** Naïem Teghlobi ; Michaela Leerdam  
**Cc:** Taryn Gooley ; Ashleigh Keevers-Eastman  
**Subject:** Draft MSP-11.Mitigation.Methodology

**EXTERNAL EMAIL:** Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Naïem & Michaela,

Please find attached the draft MSP-11 Works Mitigation Methodology for your comment.

I am sending a copy to the RAPs who were out on site with Ash Keevers-Eastman last week, and



will ask them for feedback as well. Once I've received feedback and made changes, I'll send to all RAPs with a time limit of 14 days for comment.

Cheers

Amanda

**Dr Amanda Markham**

Senior Archaeologist

M: 0400 988 963

D: (02) 9101 8719

E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

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**From:** [Amanda Markham](#)  
**To:** ["Naitem Teghlobi"; Michaela Leerdam](#)  
**Cc:** [Taryn Gooley; Ashleigh Keevers-Eastman](#)  
**Subject:** RE: Draft MSP-11.Mitigation.Methodology  
**Date:** Thursday, 20 May 2021 3:12:30 PM  
**Attachments:** [image004.png](#)  
[32012\\_Data\\_package\\_190421.zip](#)  
[image001.png](#)

---

Hi Naitem,

I'm waiting on one last RAP comment to come back, and then I'll finalise and send out to RAPs. If I haven't heard anything by 3:30pm, I'll call the RAP and ask if he's got any comments.

Item 3: I've attached a folder with the shape files that include the AHIMS sites and boundaries. Please have a look and let me know if these are ok.

Items 4 & 5. The extract below is from the current ACHMP. The purpose of the mitigation methodology is to alter the ACHMP in relation to Strategy 9 so that a new ACHA is not required and we've demonstrated to Heritage NSW and DPIE that we've consulted with RAPs on this. We still need Heritage NSW's input – I have not had a response from Sam Higgs on this yet and have left several requests for her to call me, beginning with Wednesday last week. I will now write an email to the NSW Heritage mailbox address and mark it urgent.

**Leave:**

I am taking annual leave from tomorrow until 21 June. In my absence, Ashleigh Keevers-Eastman will be the main project contact. I will leave handover notes for the project with Ash.

Cheers

Amanda

---

**From:** Naitem Teghlobi  
**Sent:** Thursday, 20 May 2021 2:23 PM  
**To:** Amanda Markham ; Michaela Leerdam  
**Cc:** Taryn Gooley ; Ashleigh Keevers-Eastman  
**Subject:** RE: Draft MSP-11.Mitigation.Methodology

Hi Amanda

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*Item 3 - coordinates for item 3 and a map would be appreciated so we can physically fence off the area*

*Item 4 & 5 – Please clarify what is involved in an ACHA and any implications on the project, ie delays?*

*I would suggest starting this as soon as possible to avoid potential delays to SW installation if significant artifacts are encountered.*



cid:image001.png@01D74D83.A57A9E10



Regards,  
NT

---

**From:** Amanda Markham <[AMarkham@biosis.com.au](mailto:AMarkham@biosis.com.au)>

**Sent:** Tuesday, 18 May 2021 4:32 PM

**To:** Naiem Teghlobi <[Naiem.Teghlobi@frasersproperty.com.au](mailto:Naiem.Teghlobi@frasersproperty.com.au)>; Michaela Leerdam <[Michaela.Leerdam@frasersproperty.com.au](mailto:Michaela.Leerdam@frasersproperty.com.au)>

**Cc:** Taryn Gooley <[TGooley@biosis.com.au](mailto:TGooley@biosis.com.au)>; Ashleigh Keevers-Eastman <[AKeevers-Eastman@biosis.com.au](mailto:AKeevers-Eastman@biosis.com.au)>

**Subject:** Draft MSP-11.Mitigation.Methodology

**EXTERNAL EMAIL:** Do not click links or open attachments unless you recognise the sender and know the content is safe.

Hi Naiem & Michaela,

Please find attached the draft MSP-11 Works Mitigation Methodology for your comment.

I am sending a copy to the RAPs who were out on site with Ash Keevers-Eastman last week, and will ask them for feedback as well. Once I've received feedback and made changes, I'll send to all RAPs with a time limit of 14 days for comment.

Cheers

Amanda

**Dr Amanda Markham**

Senior Archaeologist

M: 0400 988 963

D: (02) 9101 8719

E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

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**From:** [Amanda Markham](#)  
**To:** ["justinecoplin@optusnet.com.au"](mailto:justinecoplin@optusnet.com.au)  
**Subject:** RE: Mamre Draft MSP-11 Works Mitigation Methodology  
**Date:** Wednesday, 19 May 2021 1:38:10 PM  
**Attachments:** [image001.png](#)

---

Hi Justine,

Thanks for getting back to me – I'll make the changes to the methodology about the fencing. Late last week, the client fenced off the portion of MSP-02 (where the 30K+ artefacts came from) that isn't going to be impacted by the works.

Cheers

Amanda

---

**From:** justinecoplin@optusnet.com.au  
**Sent:** Wednesday, 19 May 2021 1:35 PM  
**To:** Amanda Markham  
**Subject:** RE: Mamre Draft MSP-11 Works Mitigation Methodology

Afternoon

That looks good, maybe instead of star pickets, they could put up temporary fencing while works are going on as a machine can wipe out star pickets, temp fencing isn't so easy.

The area that the 1000s of artefacts came out of are the fencing that off.

Thanks

Justine

---

**From:** Amanda Markham <[AMarkham@biosis.com.au](mailto:AMarkham@biosis.com.au)>  
**Sent:** Tuesday, 18 May 2021 4:37 PM  
**To:** 'justinecoplin@optusnet.com.au' <[justinecoplin@optusnet.com.au](mailto:justinecoplin@optusnet.com.au)>  
**Subject:** Mamre Draft MSP-11 Works Mitigation Methodology

Hi Justine,

Thanks for going out on site with Ash last week. I've attached a copy of the draft works mitigation strategy for you to have a look at and check that it reflects what was discussed. It's currently addressed to the client, but once finalised, we'll change the addresses to send out to all Registered Aboriginal Parties for consideration. Please let me know if you have any changes, additions or corrections you'd like me to make.

Cheers

Amanda

**Dr Amanda Markham**  
Senior Archaeologist  
M: 0400 988 963  
D: (02) 9101 8719  
E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)  
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**From:** [justinecoplin@optusnet.com.au](mailto:justinecoplin@optusnet.com.au)  
**To:** [Amanda Markham](#)  
**Subject:** RE: Mamre Draft MSP-11 Works Mitigation Methodology  
**Date:** Wednesday, 19 May 2021 1:34:36 PM  
**Attachments:** [image001.png](#)

---

Afternoon

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The area that the 1000s of artefacts came out of are the fencing that off .

Thanks

Justine

---

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**Sent:** Tuesday, 18 May 2021 4:37 PM  
**To:** 'justinecoplin@optusnet.com.au'  
**Subject:** Mamre Draft MSP-11 Works Mitigation Methodology

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Cheers

Amanda

**Dr Amanda Markham**

Senior Archaeologist

M: 0400 988 963

D: (02) 9101 8719

E: [amarkham@biosis.com.au](mailto:amarkham@biosis.com.au)

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## Appendix E: Chance/Unexpected finds contingency plan

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In the event that unexpected Aboriginal objects or sites are located, an assessment will need to be made as to the significance of the object. Appendix A contains guidelines around the identification of Aboriginal objects.

The following process should be followed with respect to unexpected finds:

- Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and Heritage NSW must be notified immediately. The find should not be moved until assessed by a qualified archaeologist.
- A 10 metre no-go area should be established around the suspected Aboriginal object, and clearly demarcated with flagging tape or similar.
- The archaeologist will investigate and assess the Aboriginal object to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the project Manager within 24 hours stating:
  - A determination of whether the find is an Aboriginal object.
  - Advice on how the project is to proceed and whether the establishment of any no-go areas is necessary.
  - A recommendation on further works that may be required and timeframe for completion of these works.
- Heritage NSW and RAPs will be notified. This will include a report stating the background of the find, find characteristics, management measures implemented and notification of any further works or management measures arising. RAPs are to be involved in any further assessments or works as required.
- AHIMS site cards will be prepared for each new site identified and submitted to AHIMS in accordance with the Code.

Should any Aboriginal objects be identified, this will trigger a review of this CHMP in accordance with Section 7.

In the event that unexpected non-Aboriginal objects or sites are located, an assessment will need to be made as to the significance of the object. Non-Aboriginal heritage items may include archaeological 'relics' or other historical items (i.e. works, structures, buildings or movable objects). Appendix B contains guidelines around the identification of non-Aboriginal heritage items.

The *Heritage Act 1977* defines a relics as:

*any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and is of State or local heritage significance.*

This includes non-Aboriginal human remains with heritage value. Headstones, grave enclosures, grave goods and associated objects may also be considered relics under the *Heritage 1977 Act*.

The following process must be followed with respect to unexpected historical heritage items:



- Should any suspected historical heritage items be encountered during works associated with this development, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.
- Secure the location by cordoning off a minimum 10 metre buffer zone around the object. This will need to be established in consultation with a qualified archaeologist who will need to assess the find.
- Photograph the find and send the photograph to the project archaeologist.
- The archaeologist will investigate and assess the item to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required.
- If the find is considered to be of heritage significance, Heritage NSW will need to be notified. This will include a statement concerning the find, its significance, and the established management measures to avoid further impact.

Before works can recommence, relevant approvals may need to be obtained under the *Heritage Act 1977*.



## Appendix F: AHIMS Site Cards

---



# Aboriginal Site Recording Form

AHIMS Registrar  
PO Box 1967, Hurstville 2220 NSW

AHIMS site ID: 45-5-5340

Date recorded: 10-08-2020

## Site Location Information

Site name: MSP-05

Easting: 294016 Northing: 6254604 Coordinates must be in GDA (MGA)

Horizontal Accuracy (m): 5

Zone: 56 Location method: Non-Differential GPS

## Recorder Information

(The person responsible for the completion and submission of this form)

Title Surname First name  
Mrs. Keats Samantha

Organisation: Biosis Pty Ltd

Address: 30 Wentworth Street, Port Kembla NSW 2505

Phone: 0242011061 E-mail: ahims@biosis.com.au

## Site Context Information

Land Form Pattern: Floodplain Land Use: Pastoral/Grazing

Land Form Unit: Slope Vegetation: Cleared

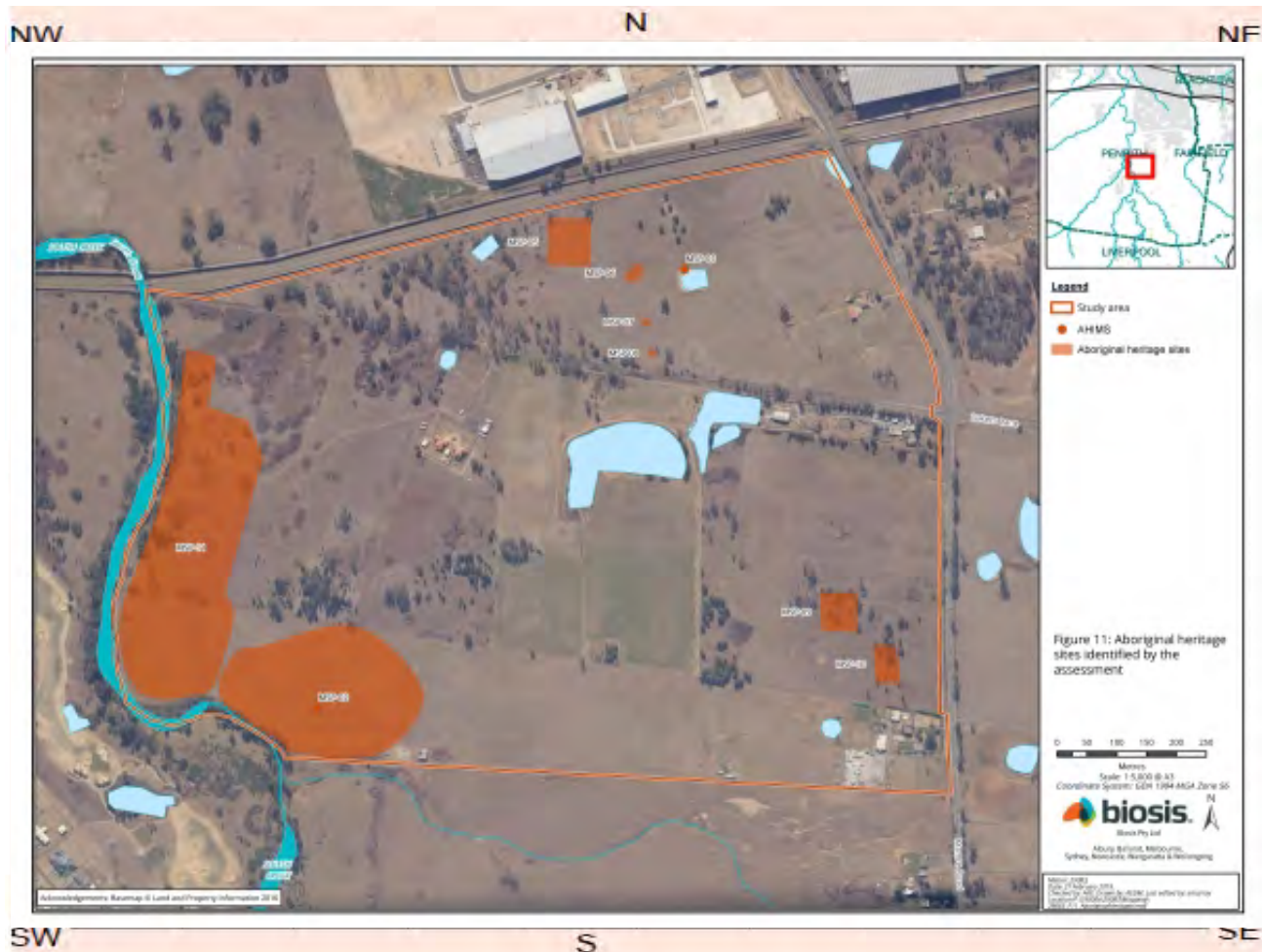
Distance to Water (m): 750 Primary Report: Biosis 2019. Mamre South Precinct ACHA

How to get to the site: The site is located within Lot 34 DP 1118173, approximately 470 meters west of Mamre Road, Kemps Creek. The site is located approximately 750 metres east of South Creek.

Other site information: MSP-05 consists of a low density sub-surface artefact scatter found on a gentle slope landform. The site consists of five artefacts and is a common site type in the region. This site has been assessed with low scientific significance.



## Site location map



## Site contents information

open/closed site:

Site condition:

### Features:

Features:	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
1. <input type="text" value="Artefact"/>	<input type="text" value="5"/>	<input type="text" value="75"/>	<input type="text" value="75"/>

### Description:

A total of five artefacts were recovered from four test pits. These artefacts consisted of one complete flake, one longitudinal flake fragment and three angular fragments. Two pieces of angular fragment recovered from this site displayed evidence of potlidding and crenation suggesting heat shatter.

### Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

### Features:

Features:	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
2. <input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

### Description:

### Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>



**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
3.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

<input type="text"/>
----------------------

## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------	----------------------

**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
4.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

<input type="text"/>
----------------------

## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------	----------------------

**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
5.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

<input type="text"/>
----------------------

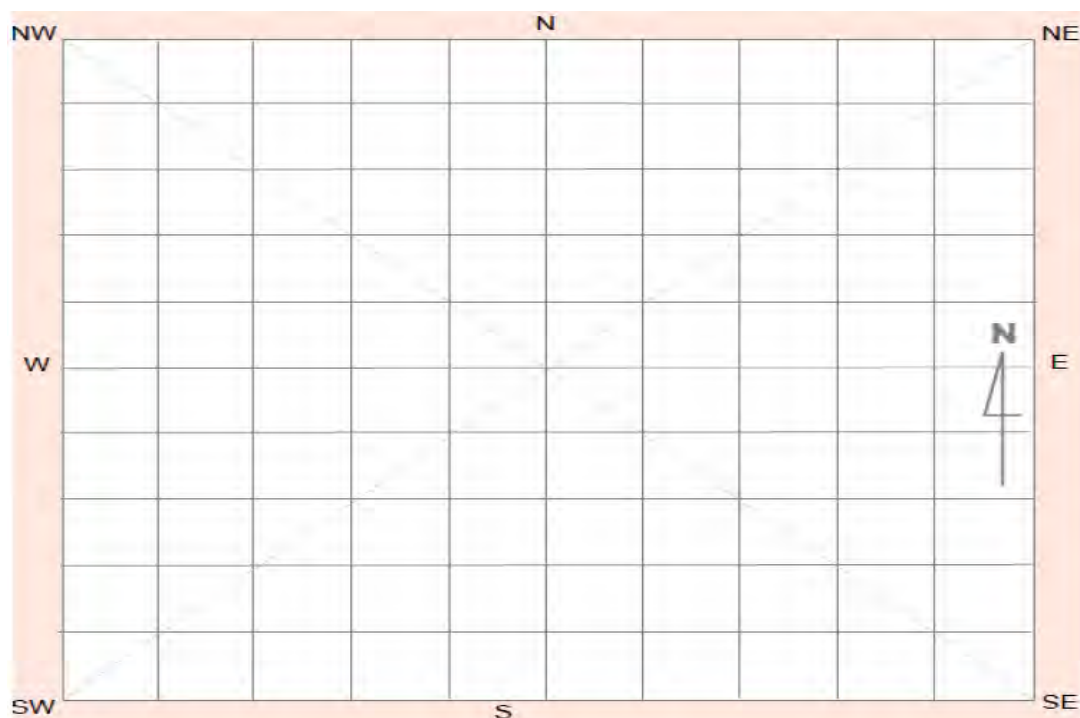
## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------	----------------------

Other Site Info:

MSP-05 consists of a low density sub-surface artefact scatter found on a gentle slope landform. The site consists of five artefacts and is a common site type in the region. This site has been assessed with low scientific significance.

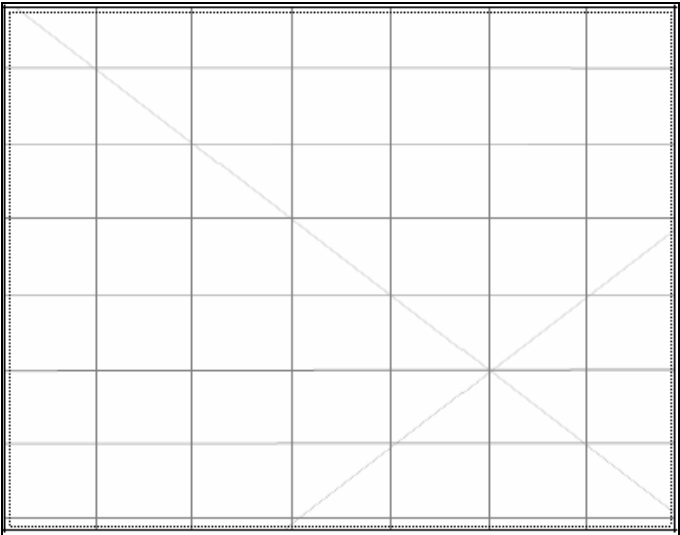
**Site plan**



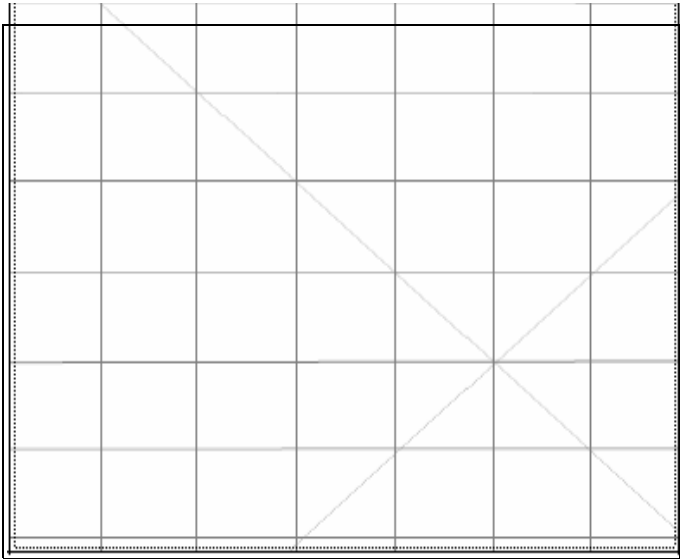
Site photographs



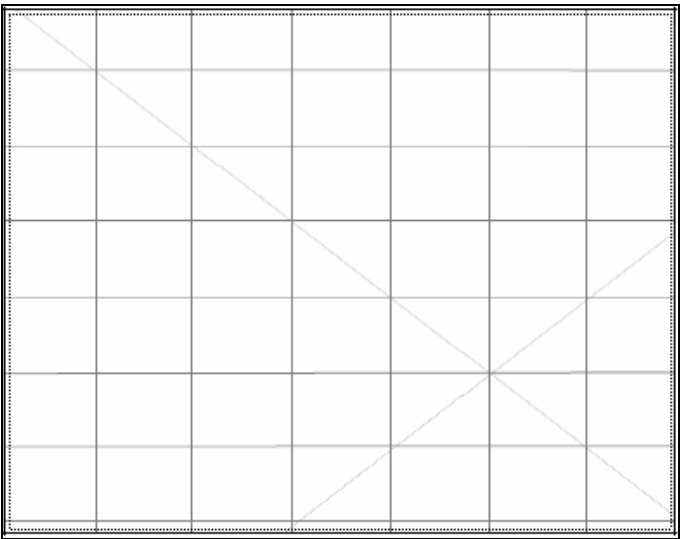
Description: North-western facing view of MSP-05



Description:



Description:



Description:

Site restrictions

Do you want to Restrict this site?:

☐

Restriction type:

Gender: ☐ General: ☐ Location: ☐

Why is this site restricted?:

Further information contact

Title

Surname

First name

Organisation:

Address:

Phone:

E-mail:



# Aboriginal Site Recording Form

AHIMS Registrar  
PO Box 1967, Hurstville 2220 NSW

AHIMS site ID: 45-5-5341

Date recorded: 10-08-2020

## Site Location Information

Site name: MSP-06

Easting: 294123 Northing: 6254552 Coordinates must be in GDA (MGA)

Horizontal Accuracy (m): 5

Zone: 56 Location method: Differential GPS

## Recorder Information

(The person responsible for the completion and submission of this form)

Title Surname First name  
Mrs. Keats Samantha

Organisation: Biosys Pty Ltd

Address: 30 Wentworth Street, Port Kembla NSW 2505

Phone: 0242011061 E-mail: ahims@biosys.com.au

## Site Context Information

Land Form Pattern: Floodplain Land Use: Pastoral/Grazing

Land Form Unit: Slope Vegetation: Cleared

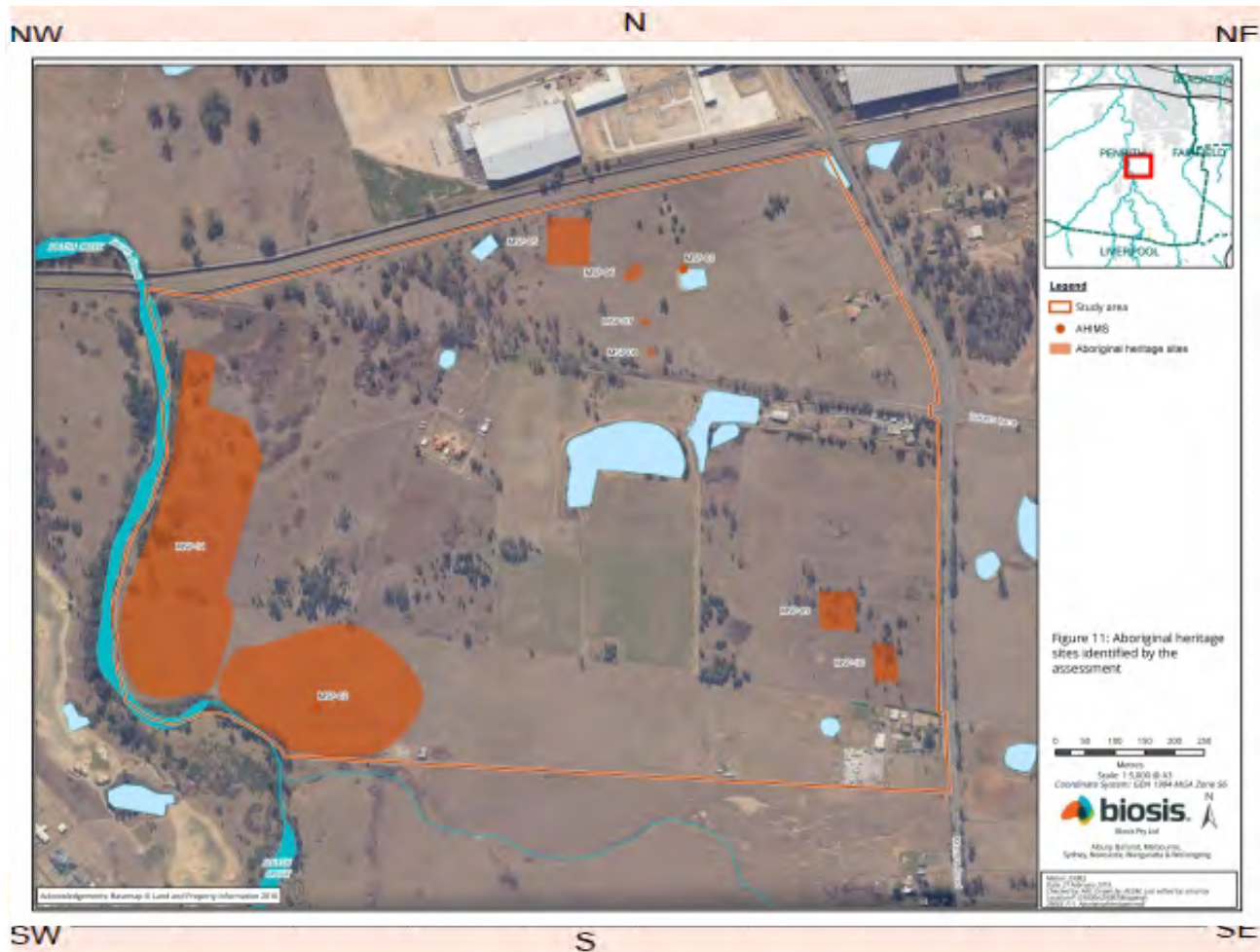
Distance to Water (m): 800 Primary Report: Biosys 2019. Mamre South Precinct ACHA

How to get to the site: The site is located within Lot 34 DP 1118173, approximately 400 meters west of Mamre Road, Kemps Creek. The site is located approximately 800 metres east of South Creek.

Other site information: MSP-06 consists of a low density sub-surface artefact scatter found on a gentle slope landform. The site consists of two artefacts and is a common site type in the region. This site has been assessed with low scientific significance.



## Site location map



## Site contents information

open/closed site:

<b>Site condition:</b>	Good
------------------------	------

### Features:

1.

## Artefact

Number of features

Length of  
feature(s)  
extent (m)

Width of  
feature (s)  
extent (m)

Scar  
(cm)

### h Regrowth (cm)

Scar shape Tree Species

2

25

16

5

5

11

--

Description:

Consists of a low density sub-surface artefact deposit. Two artefacts were recovered from two test pits and consisted of a silcrete angular fragment and silcrete proximal flake.

### Features:

2.

Number of features

Length of  
feature(s)  
extent (m)

Width of  
feature (s)  
extent (m)

Scar  
(cm)

### h Regrowth (cm)

Scar shape Tree Species

7

7

7

7

7

1

□

Description:



**Features:**

3.

Description:

## Scarred Trees

Scar Depth (cm) Regrowth (cm) Scar shape Tree Species

**Features:**

4.

Description:

## Scarred Trees

Scar Depth (cm) Regrowth (cm) Scar shape Tree Species

**Features:**

5.

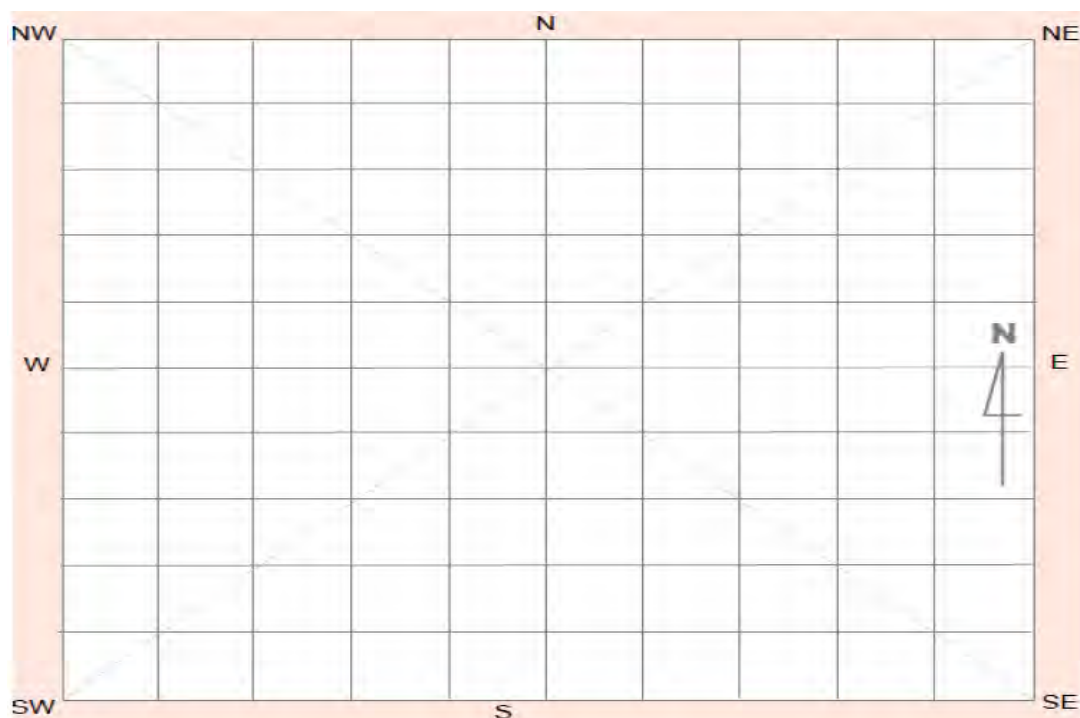
Description:

## Scarred Trees

Scar Depth (cm) Regrowth (cm) Scar shape Tree Species

Other Site  
Info:

MSP-06 consists of a low density sub-surface artefact scatter found on a gentle slope landform. The site consists of two artefacts and is a common site type in the region. This site has been assessed with low scientific significance.

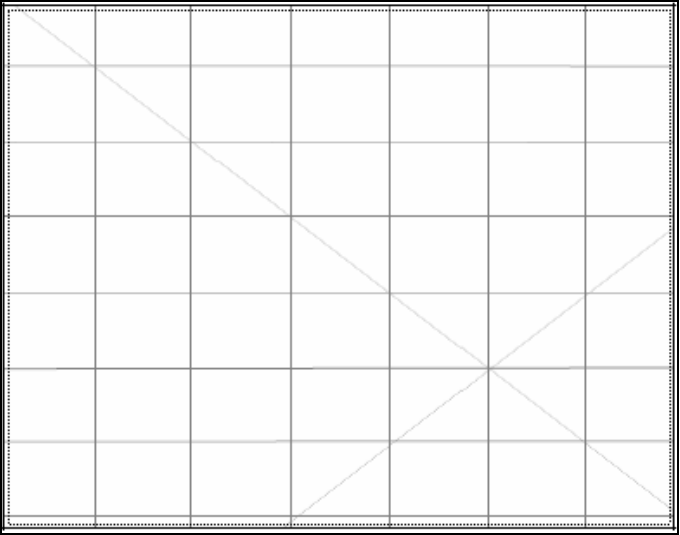
**Site plan**



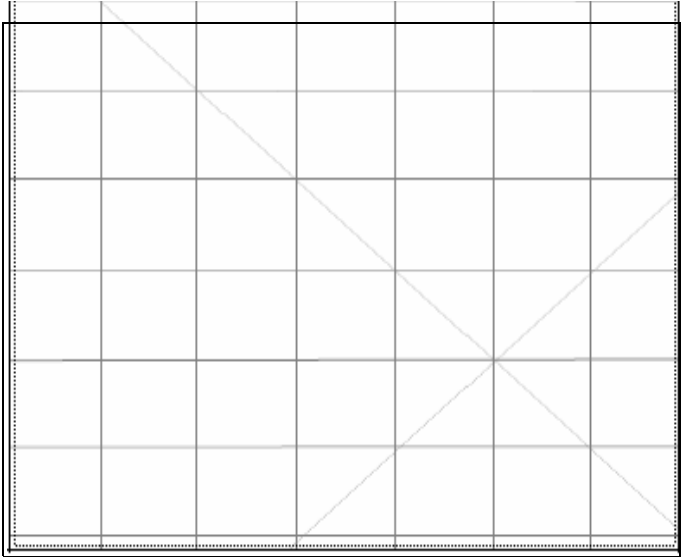
Site photographs



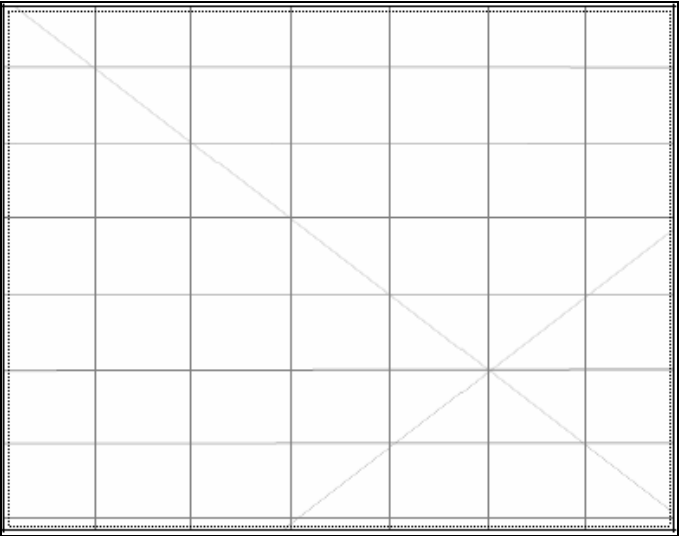
Description:



Description:



Description:



Description:

Site restrictions

Do you want to Restrict this site?:

Restriction type:

Why is this site restricted?:

Further information contact

Title

Surname

First name

Organisation:

Address:

Phone:

E-mail:



# Aboriginal Site Recording Form

AHIMS Registrar  
PO Box 1967, Hurstville 2220 NSW

AHIMS site ID: 45-5-5342

Date recorded: 10-08-2020

## Site Location Information

Site name: MSP-07

Easting: 294146 Northing: 6254469 Coordinates must be in GDA (MGA)

Horizontal Accuracy (m): 5

Zone: 56 Location method: Non-Differential GPS

## Recorder Information

(The person responsible for the completion and submission of this form)

Title Surname First name  
Mrs. Keats Samantha

Organisation: Biosis Pty Ltd

Address: 30 Wentworth Street, Port Kembla NSW 2505

Phone: 0242011061 E-mail: ahims@biosis.com.au

## Site Context Information

Land Form Pattern: Floodplain Land Use: Pastoral/Grazing

Land Form Unit: Slope Vegetation: Cleared

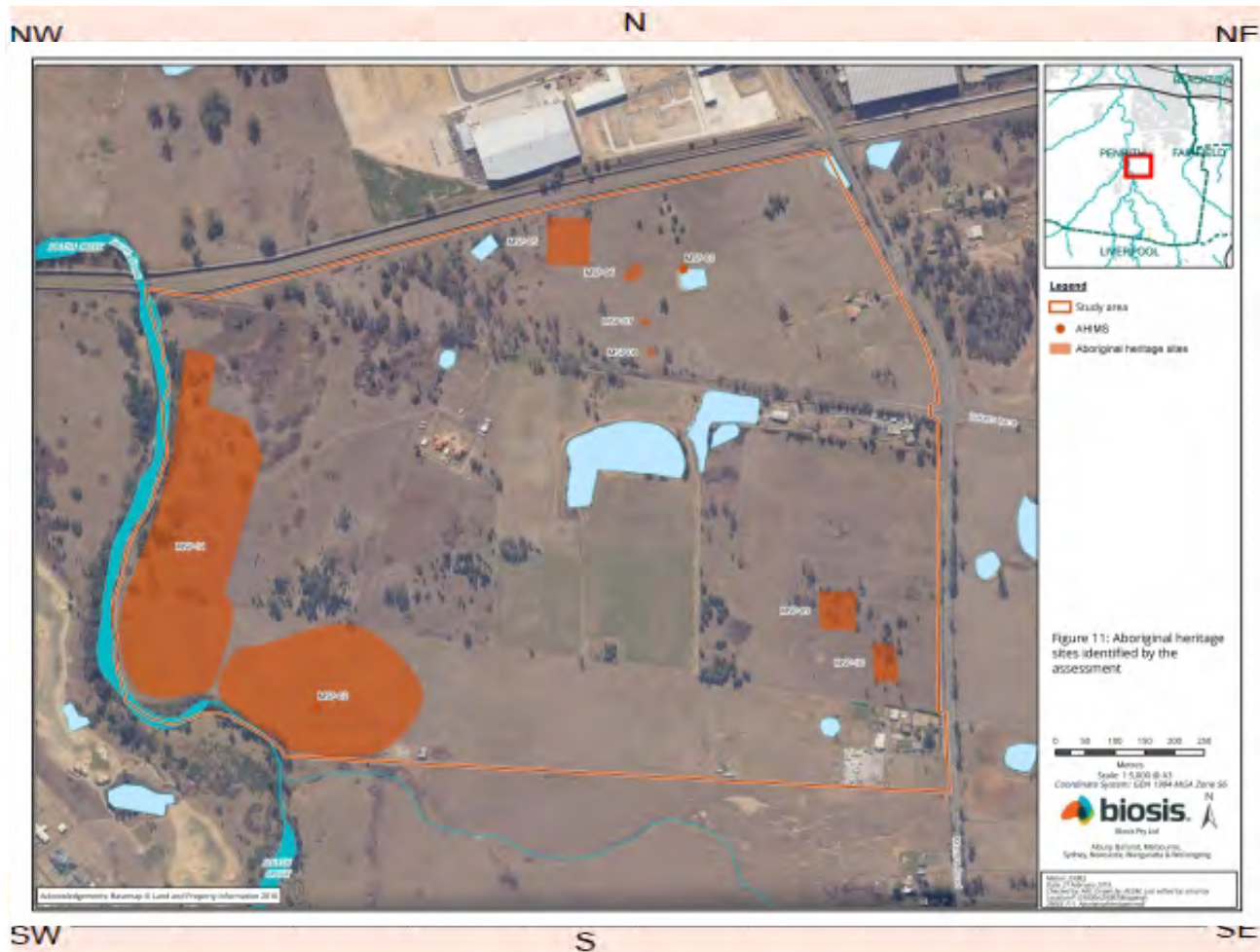
Distance to Water (m): 750 Primary Report: Biosis 2019. Mamre South Precinct ACHA

How to get to the site: The site is located within Lot 34 DP 1118173, approximately 400 meters west of Mamre Road, Kemps Creek. The site is located approximately 750 metres east of South Creek.

Other site information: MSP-07 consists of an isolated angular fragment found on a gentle slope landform. The site is a common site type in the region and has been assessed with low scientific significance.



## Site location map



## Site contents information

open/closed site:

<b>Site condition:</b>	Good
------------------------	------

### Features:

1.

## Artefact

Number of features

Length of  
feature(s)  
extent (m)

Width of  
feature (s)  
extent (m)

Scar I  
(cm)

### h Regrowth (cm)

Scar shape Tree Species

### Tree Species

1

10

10

1

7

Page 10

Description:

One isolated sub-surface artefact was recovered from this site during test excavations consisting of an indurated mudstone tuff (IMT) angular fragment.

### Features:

2.

Number of features

Length of  
feature(s)  
extent (m)

Width of  
feature (s)  
extent (m)

Scar I  
(cm)

### h Regrowth (cm)

Scar shape Tree Species

### Tree Species

7

5

--	--

7

1

7

11

Description:



**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
3.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

<input type="text"/>
----------------------

## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------	----------------------

**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
4.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

<input type="text"/>
----------------------

## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------	----------------------

**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
5.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

<input type="text"/>
----------------------

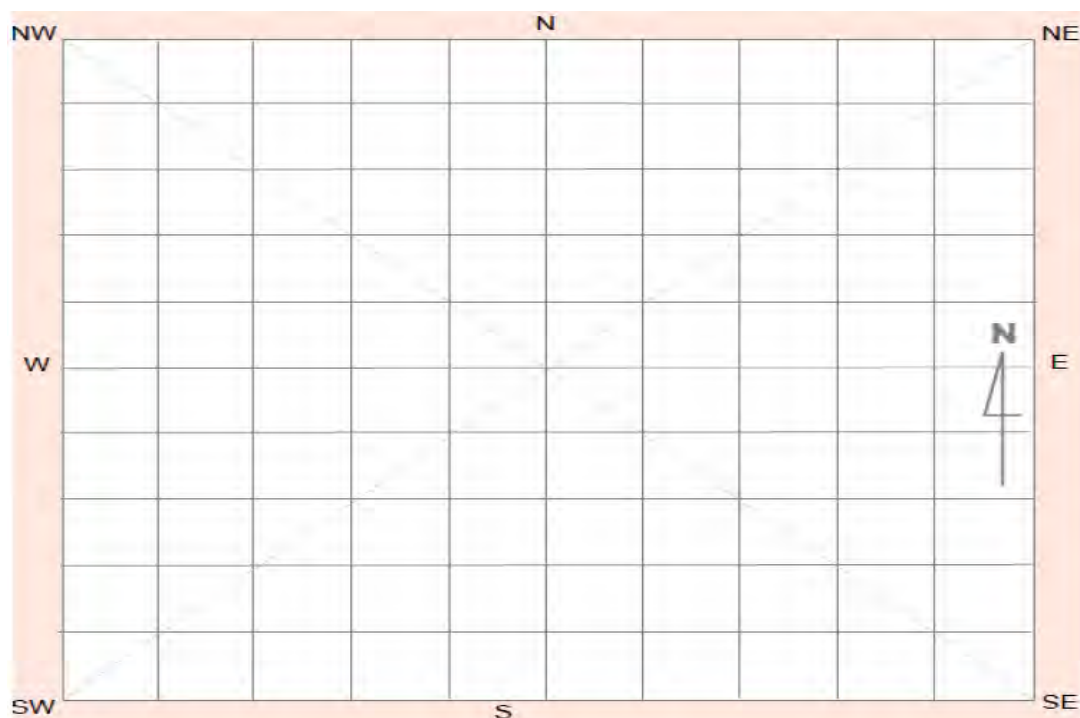
## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------	----------------------

Other Site Info:

MSP-07 consists of an isolated angular fragment found on a gentle slope landform. The site is a common site type in the region and has been assessed with low scientific significance.

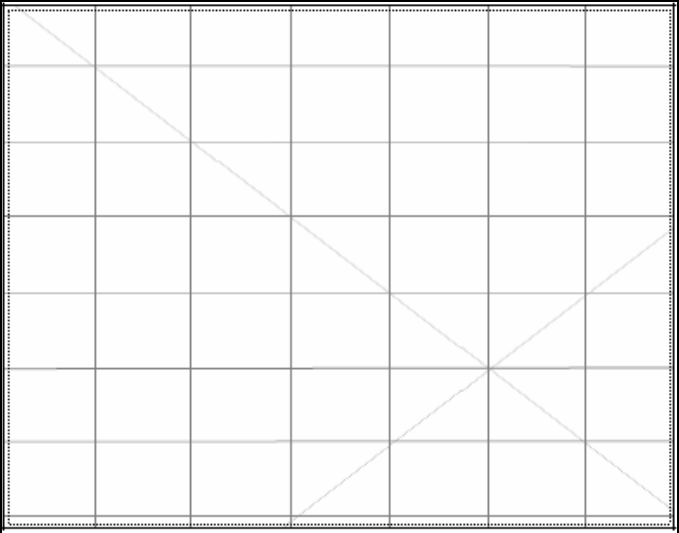
**Site plan**



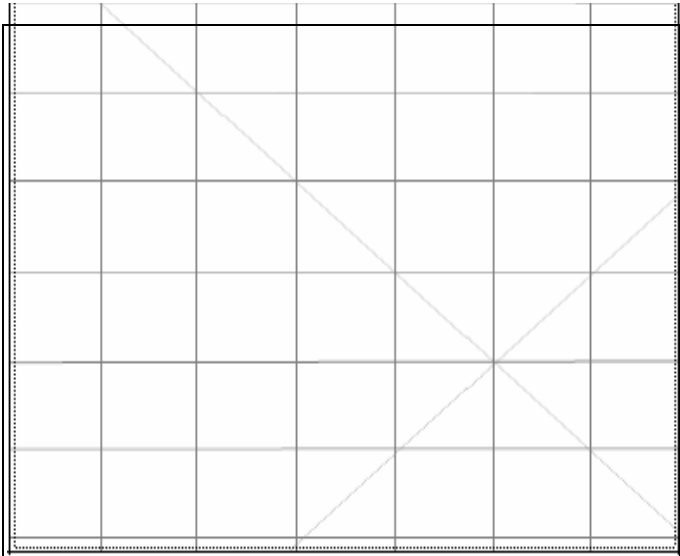
Site photographs



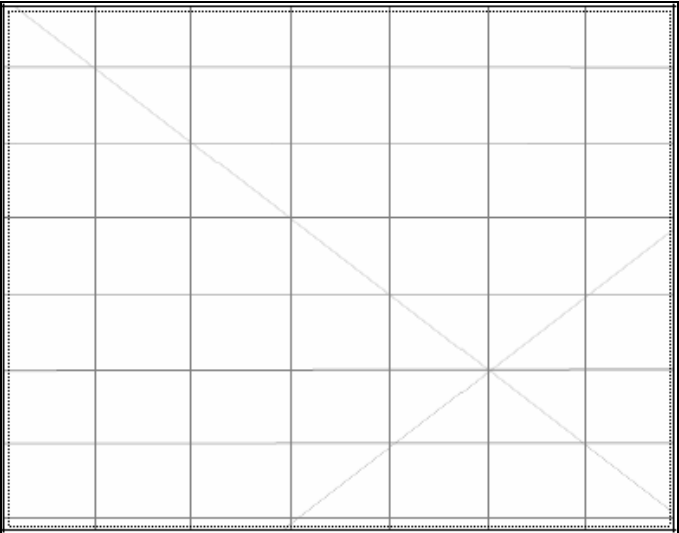
Description: North west facing view of MSP-07



Description:



Description:



Description:

Site restrictions

Do you want to Restrict this site?:

☐

Restriction type:

Gender	General	Location
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Why is this site restricted?:

Further information contact

Title	Surname	First name
<input type="text"/>	<input type="text"/>	<input type="text"/>
Organisation:	<input type="text"/>	
Address:	<input type="text"/>	
Phone:	<input type="text"/>	E-mail: <input type="text"/>



# Aboriginal Site Recording Form

AHIMS Registrar  
PO Box 1967, Hurstville 2220 NSW

AHIMS site ID: 45-5-5343

Date recorded: 10-08-2020

## Site Location Information

Site name: MSP-08

Easting: 294155 Northing: 6254417 Coordinates must be in GDA (MGA)

Horizontal Accuracy (m): 5

Zone: 56 Location method: Non-Differential GPS

## Recorder Information

(The person responsible for the completion and submission of this form)

Title Surname First name  
Mrs. Keats Samantha

Organisation: Biosys Pty Ltd

Address: 30 Wentworth Street, Port Kembla NSW 2505

Phone: 0242011061 E-mail: ahims@biosys.com.au

## Site Context Information

Land Form Pattern: Floodplain Land Use: Pastoral/Grazing

Land Form Unit: Slope Vegetation: Cleared

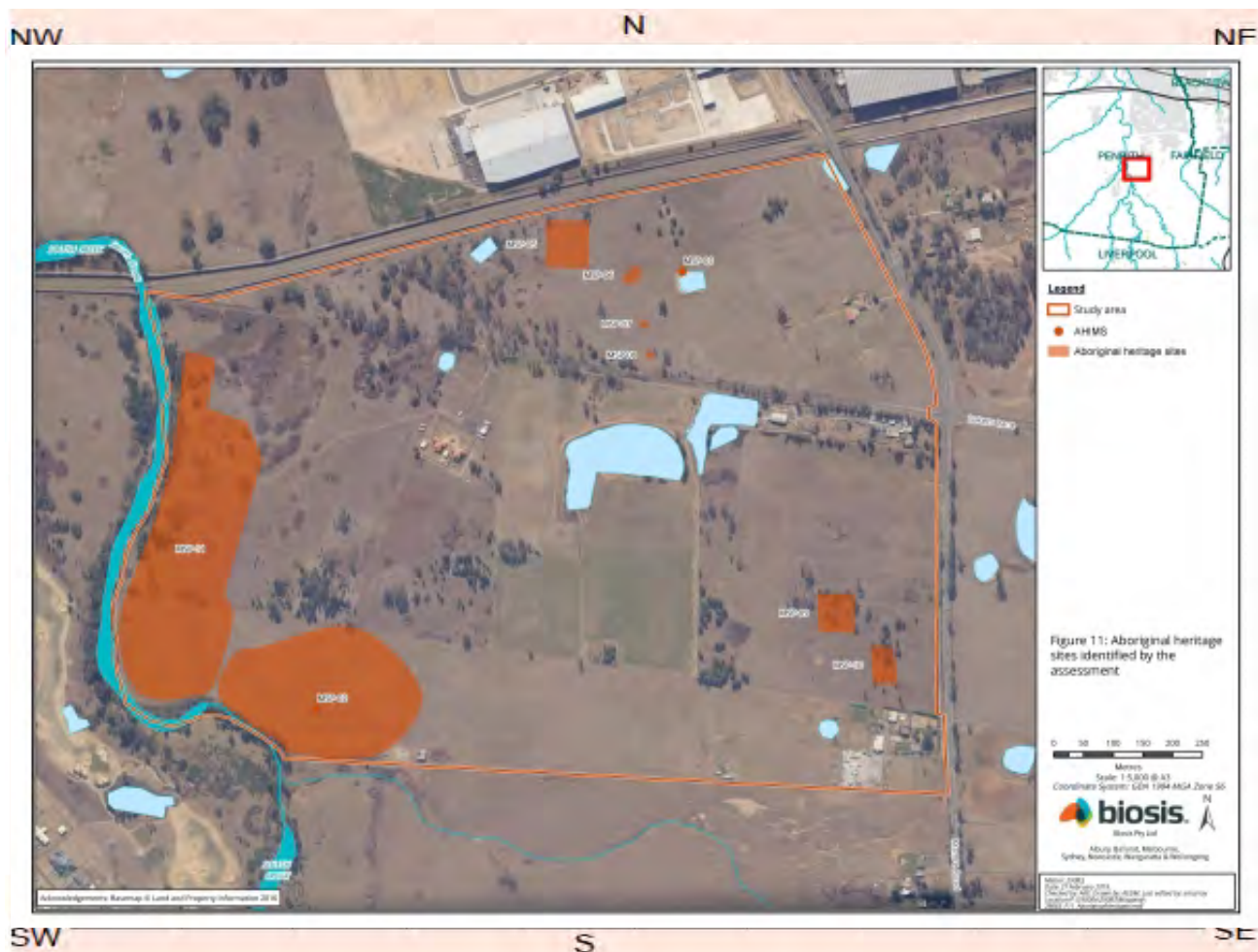
Distance to Water (m): 750 Primary Report: Biosys 2019. Mamre South Precinct ACHA

How to get to the site: The site is located within Lot 34 DP 1118173, approximately 450 meters west of Mamre Road, Kemps Creek. The site is located approximately 750 metres east of South Creek.

Other site information: MSP-08 consists of an isolated quartz bipolar flake found on a gentle slope landform. The site is a common site type in the region and has been assessed with low scientific significance.



## Site location map



## Site contents information

open/closed site:

Site condition:

### Features:

Features:	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
1. <input type="text" value="Artefact"/>	<input type="text" value="1"/>	<input type="text" value="10"/>	<input type="text" value="10"/>

### Description:

One isolated sub-surface artefact was recovered from this site during test excavations consisting of an of a quartz bipolar flake.

### Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

### Features:

Features:	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
2. <input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

### Description:

### Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>



**Features:**

3.

Description:

## Scarred Trees

Scar Depth (cm) Regrowth (cm) Scar shape Tree Species

**Features:**

4.

Description:

## Scarred Trees

Scar Depth (cm) Regrowth (cm) Scar shape Tree Species

**Features:**

5.

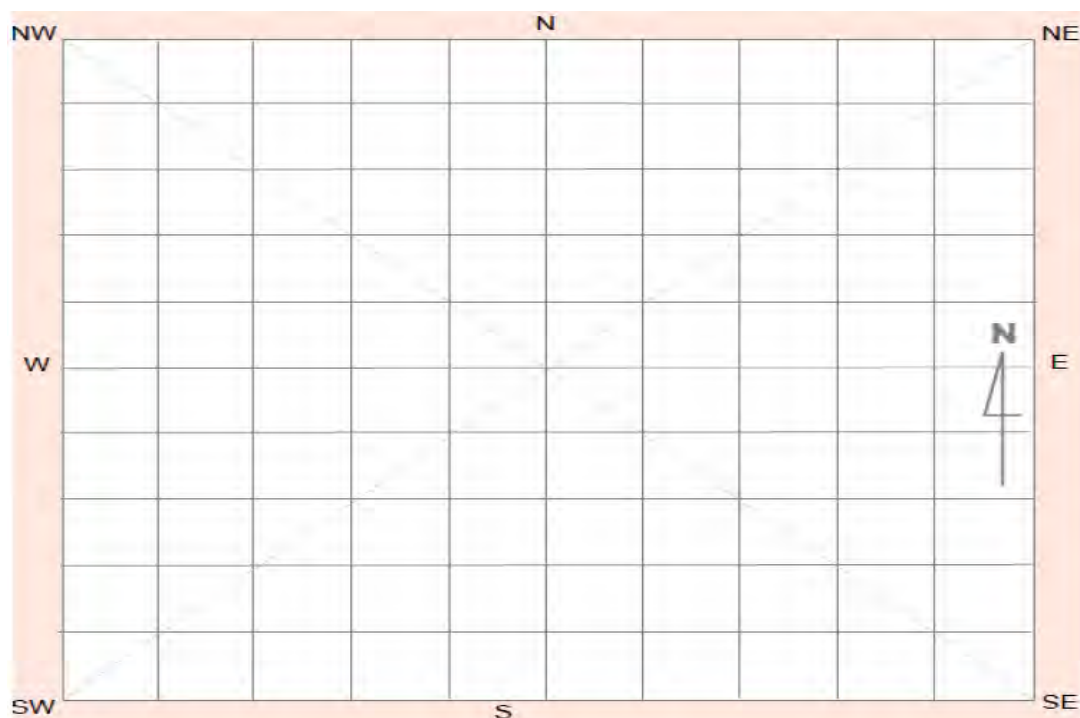
Description:

## Scarred Trees

Scar Depth (cm) Regrowth (cm) Scar shape Tree Species

Other Site  
Info:

MSP-08 consists of an isolated quartz bipolar flake found on a gentle slope landform. The site is a common site type in the region and has been assessed with low scientific significance.

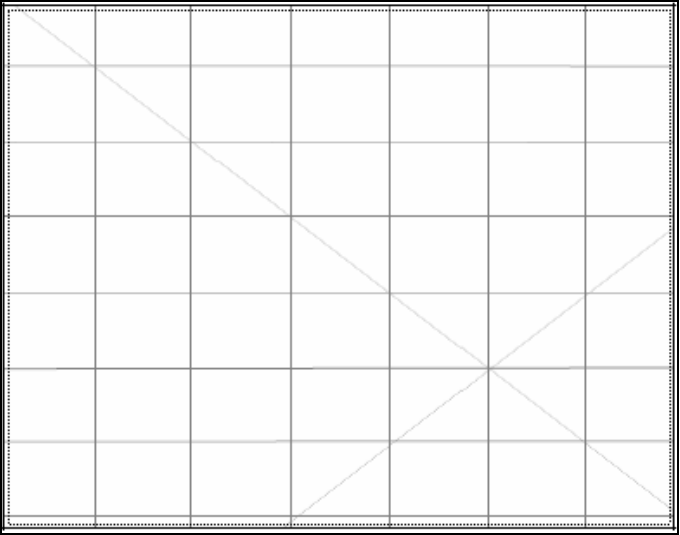
**Site plan**



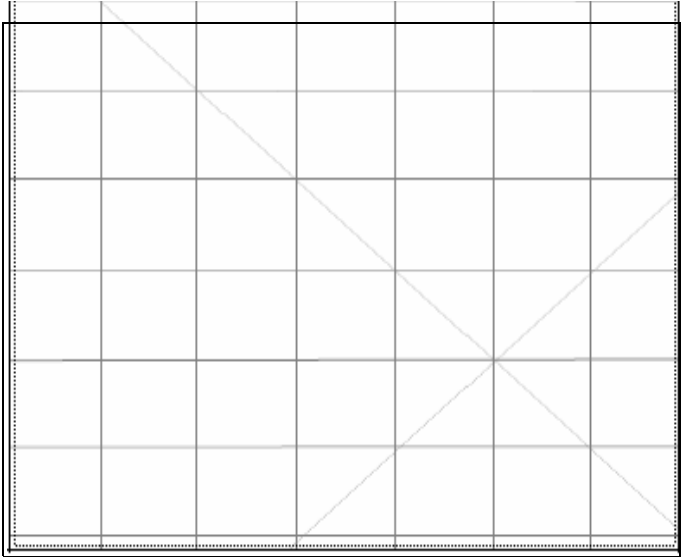
Site photographs



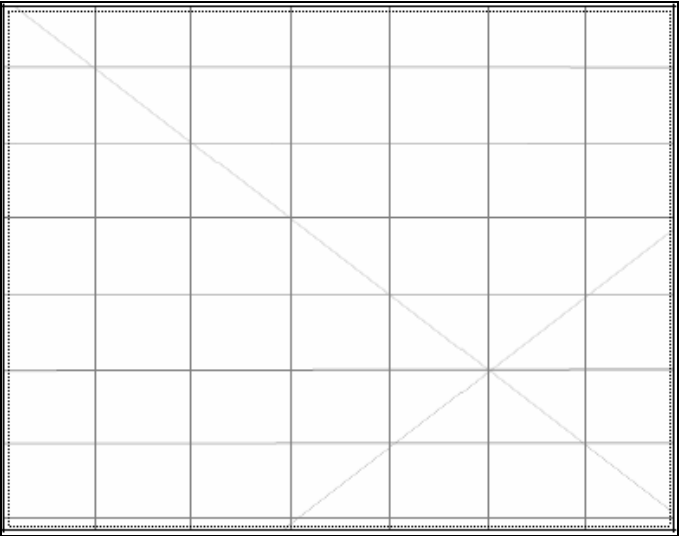
Description: North facing view of MSP-08



Description:



Description:



Description:

Site restrictions

Do you want to Restrict this site?:

☐

Restriction type:

Gender: ☐ General: ☐ Location: ☐

Why is this site restricted?:

Further information contact

Title:  Surname:  First name:

Organisation:

Address:

Phone:  E-mail:



# Aboriginal Site Recording Form

AHIMS Registrar  
PO Box 1967, Hurstville 2220 NSW

AHIMS site ID: 45-5-5344

Date recorded: 10-08-2020

## Site Location Information

Site name: MSP-09

Easting: 294469 Northing: 6253984 Coordinates must be in GDA (MGA)

Horizontal Accuracy (m): 5

Zone: 56 Location method: Non-Differential GPS

## Recorder Information

(The person responsible for the completion and submission of this form)

Title Surname First name  
Mrs. Keats Samantha

Organisation: Biosis Pty Ltd

Address: 30 Wentworth Street, Port Kembla NSW 2505

Phone: 0242011061 E-mail: ahims@biosis.com.au

## Site Context Information

Land Form Pattern: Floodplain Land Use: Pastoral/Grazing

Land Form Unit: Slope Vegetation: Cleared

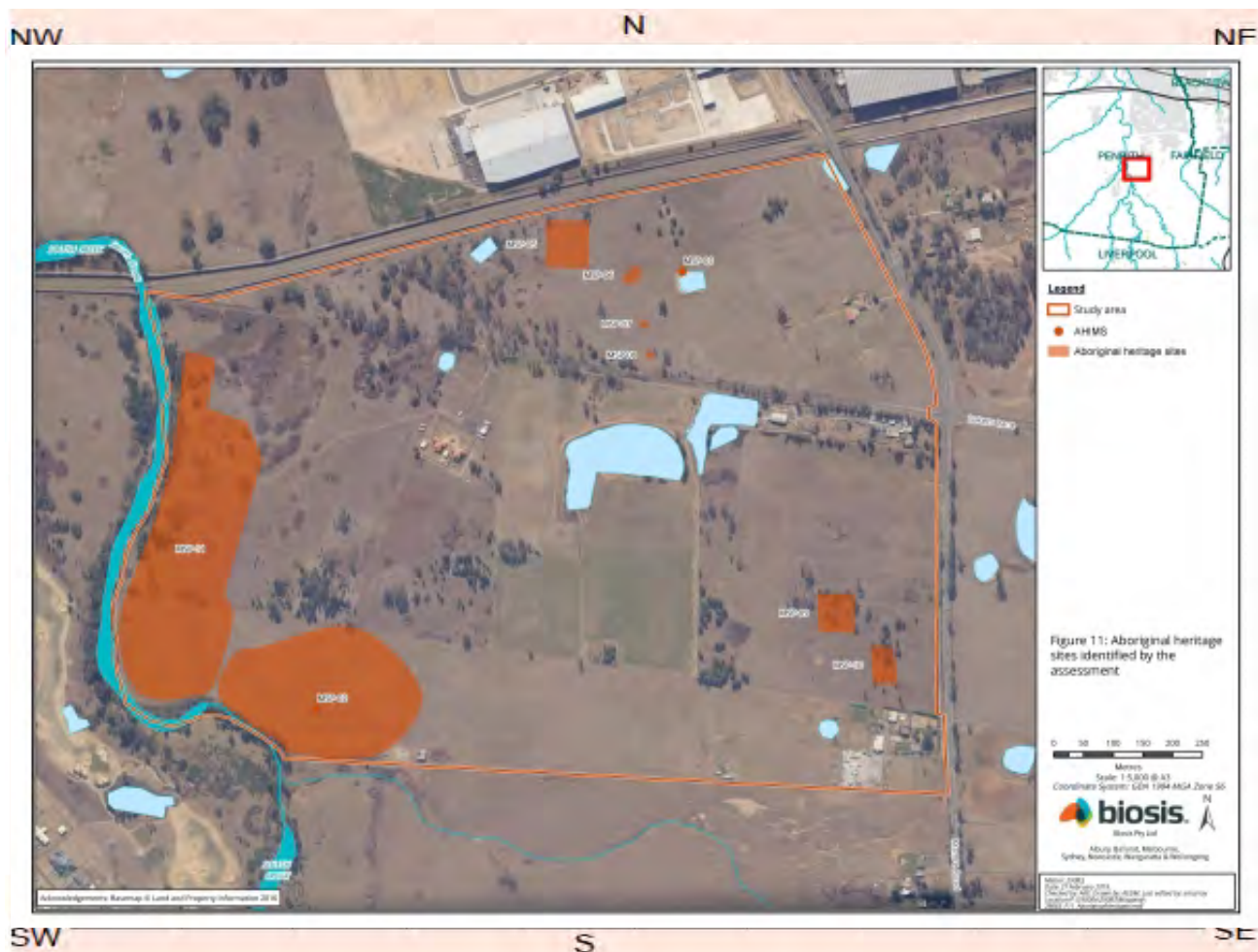
Distance to Water (m): 1000 Primary Report: Biosis 2019. Mamre South Precinct ACHA

How to get to the site: The site is located within Lot Y DP 421633, approximately 150 meters west of Mamre Road, Kemps Creek. The site is located approximately 1 kilometre east of South Creek.

Other site information: MSP-09 consists of a low density sub-surface artefact scatter found on a gentle slope landform. The site consists of seven artefacts and is a common site type in the region. This site has been assessed with low scientific significance.



## Site location map



## Site contents information

open/closed site:

Site condition:

### Features:

Features:	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
1. <input type="text" value="Artefact"/>	<input type="text" value="7"/>	<input type="text" value="60"/>	<input type="text" value="60"/>

### Description:

A total of seven artefacts were identified at this site. They consisted of one complete flake, one distal flake, one proximal flake, three angular fragments and one Bondi point fragment

### Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

### Features:

Features:	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
2. <input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

### Description:

### Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>



**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
3.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------	----------------------

**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
4.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------	----------------------

**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
5.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

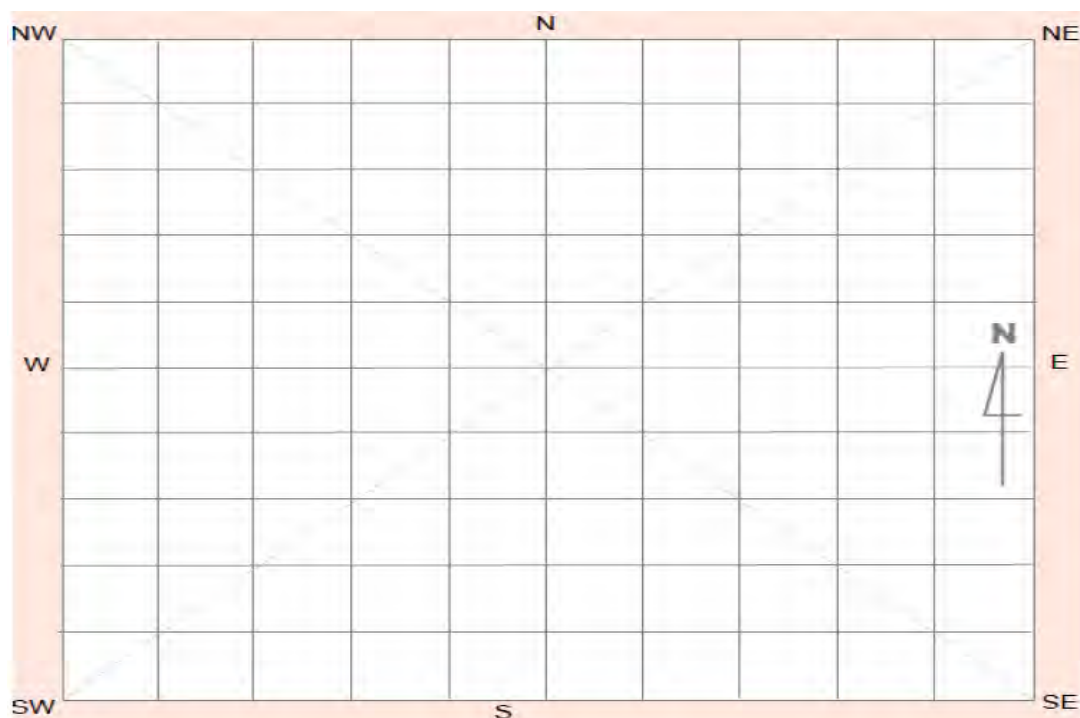
## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
----------------------	----------------------	----------------------	----------------------

Other Site Info:

MSP-09 consists of a low density sub-surface artefact scatter found on a gentle slope landform. The site consists of seven artefacts and is a common site type in the region. This site has been assessed with low scientific significance.

**Site plan**

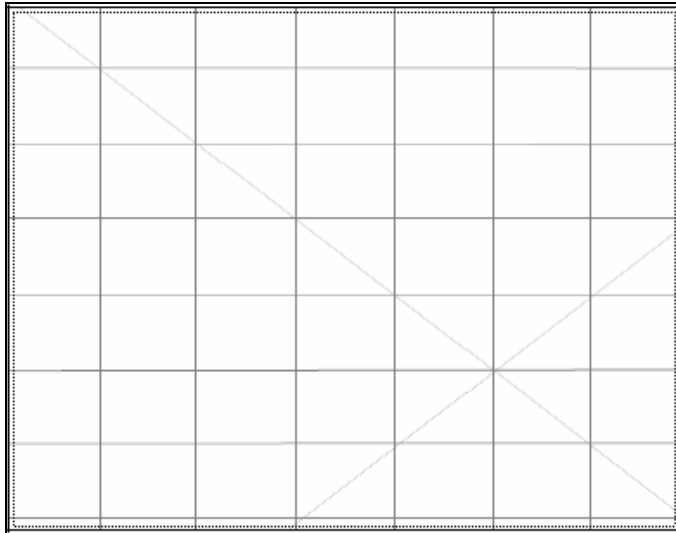


## Site photographs

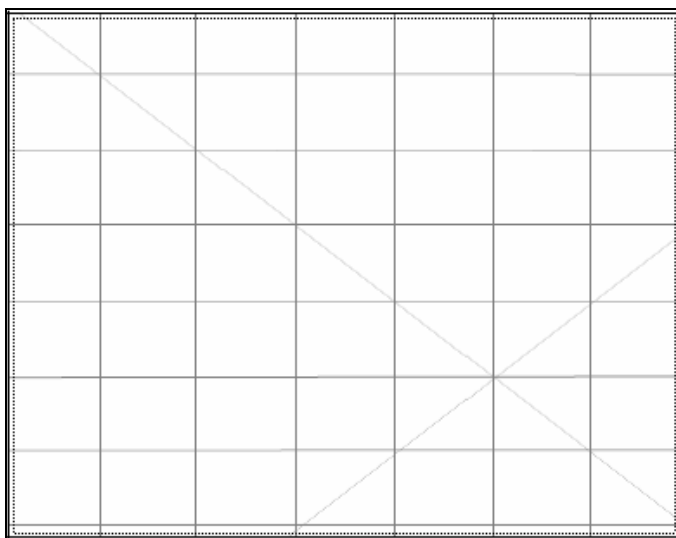


Description:

West facing view of MSP-09



Description:



Description:

Description:

## Site restrictions

Do you want to

Restrict this site?:

☐

Restriction type:

Gender

☐

General

☐

Location

☐

Why is this site restricted?:

## Further information contact

Title

Surname

First name

Organisation:

Address:

Phone:

E-mail:



# Aboriginal Site Recording Form

AHIMS Registrar  
PO Box 1967, Hurstville 2220 NSW

AHIMS site ID: 45-5-5345

Date recorded: 10-08-2020

## Site Location Information

Site name: MSP-10

Easting: 294548 Northing: 6253896 Coordinates must be in GDA (MGA)

Horizontal Accuracy (m): 5

Zone: 56 Location method: Non-Differential GPS

## Recorder Information

(The person responsible for the completion and submission of this form)

Title Surname First name  
Mrs. Keats Samantha

Organisation: Biosis Pty Ltd

Address: 30 Wentworth Street, Port Kembla NSW 2505

Phone: 0242011061 E-mail: ahims@biosis.com.au

## Site Context Information

Land Form Pattern: Floodplain Land Use: Pastoral/Grazing

Land Form Unit: Slope Vegetation: Cleared

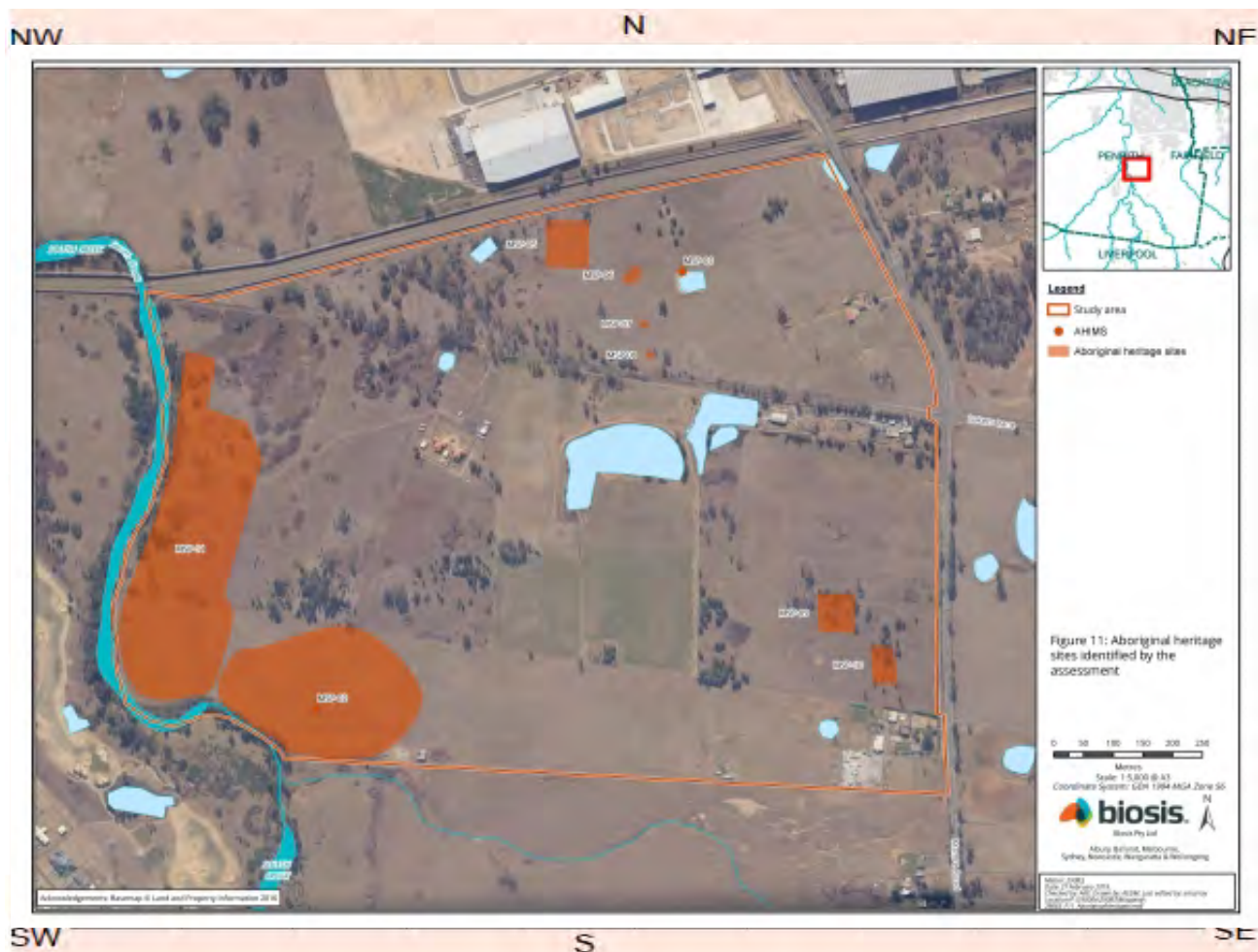
Distance to Water (m): 1000 Primary Report: Biosis 2019. Mamre South Precinct ACHA

How to get to the site: The site is located within Lot Y DP 421633, approximately 75 meters west of Mamre Road, Kemps Creek. The site is located approximately 1 kilometre east of South Creek.

Other site information: MSP-10 consists of a low density sub-surface artefact scatter found on a gentle slope landform. The site consists of nine artefacts and is a common site type in the region. This site has been assessed with low scientific significance.



## Site location map



## Site contents information

open/closed site:

Site condition:

### Features:

Features:	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
1. <input type="text" value="Artefact"/>	<input type="text" value="9"/>	<input type="text" value="40"/>	<input type="text" value="60"/>

### Description:

A total of nine artefacts were identified at this site, comprising one complete flake, one distal flake, one proximal flake, and six pieces of angular fragment.

### Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

### Features:

Features:	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
2. <input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

### Description:

### Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>



**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
3.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
4.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
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<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
5.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

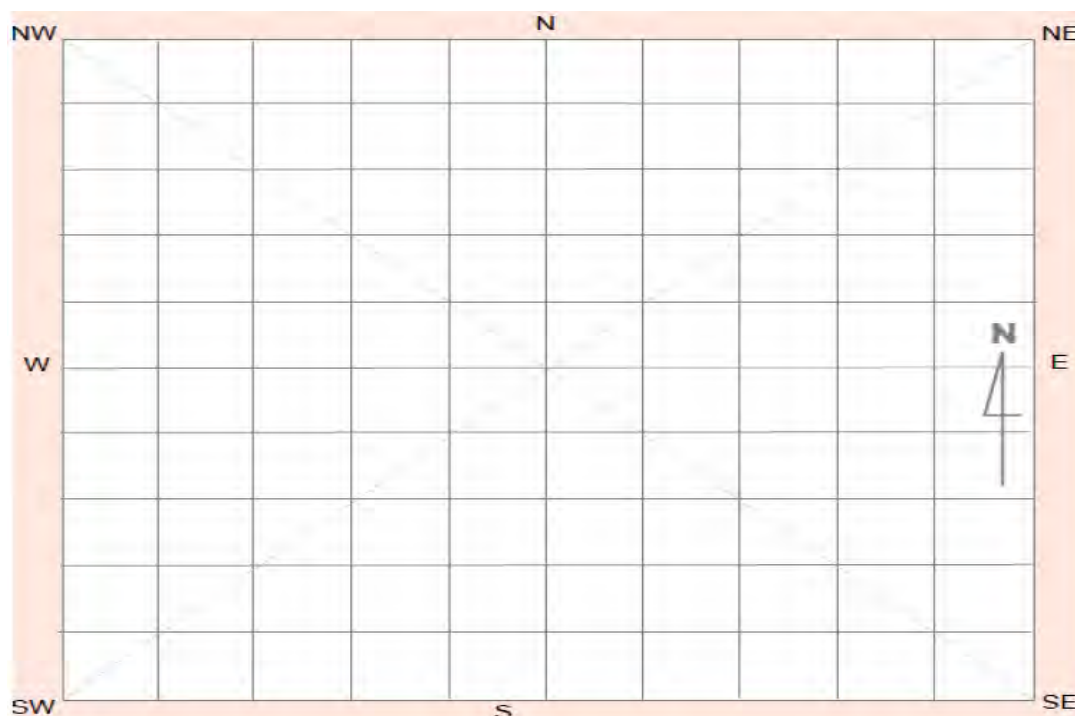
## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
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<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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Other Site Info:

MSP-10 consists of a low density sub-surface artefact scatter found on a gentle slope landform. The site consists of nine artefacts and is a common site type in the region. This site has been assessed with low scientific significance.

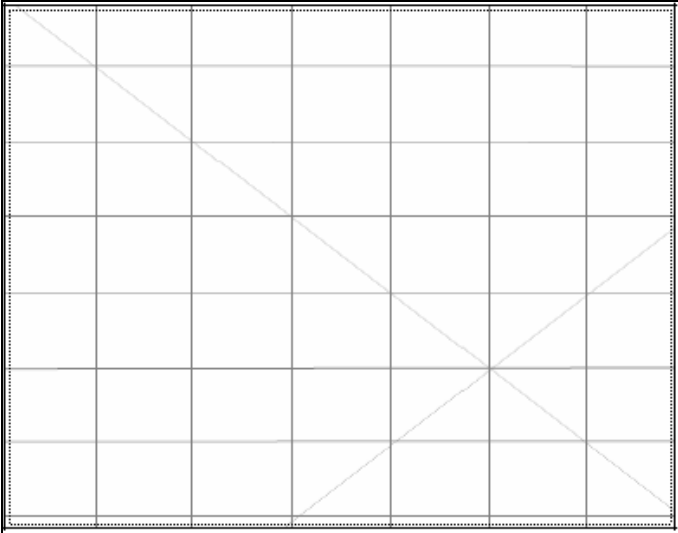
**Site plan**



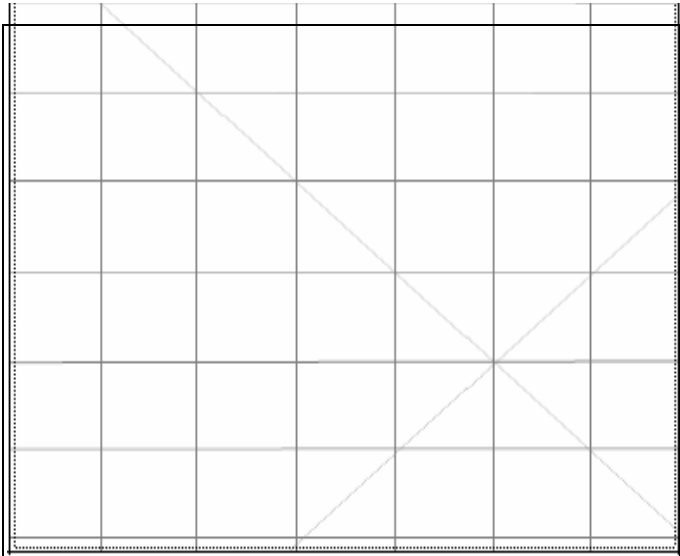
Site photographs



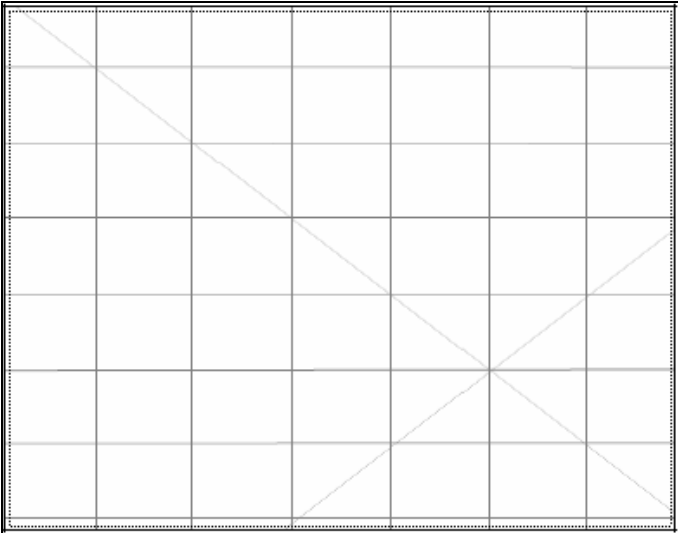
Description:



Description:



Description:



Description:

Site restrictions

Do you want to  
Restrict this site?:

Restriction type:

Why is this site restricted?:

Further information contact

Title

Surname

First name

Organisation:

Address:

Phone:  E-mail:



# Aboriginal Site Recording Form

AHIMS Registrar  
PO Box 1967, Hurstville 2220 NSW

AHIMS site ID: 45-5-5346

Date recorded: 10-08-2020

## Site Location Information

Site name: MSP-11

Easting: 293382 Northing: 6254091 Coordinates must be in GDA (MGA)

Horizontal Accuracy (m): 5

Zone: 56 Location method: Non-Differential GPS

## Recorder Information

(The person responsible for the completion and submission of this form)

Title Surname First name  
Mrs. Keats Samantha

Organisation: Biosis Pty Ltd

Address: 30 Wentworth Street, Port Kembla NSW 2505

Phone: 0242011061 E-mail: ahims@biosis.com.au

## Site Context Information

Land Form Pattern: Floodplain Land Use: Pastoral/Grazing

Land Form Unit: Terrace Vegetation: Cleared

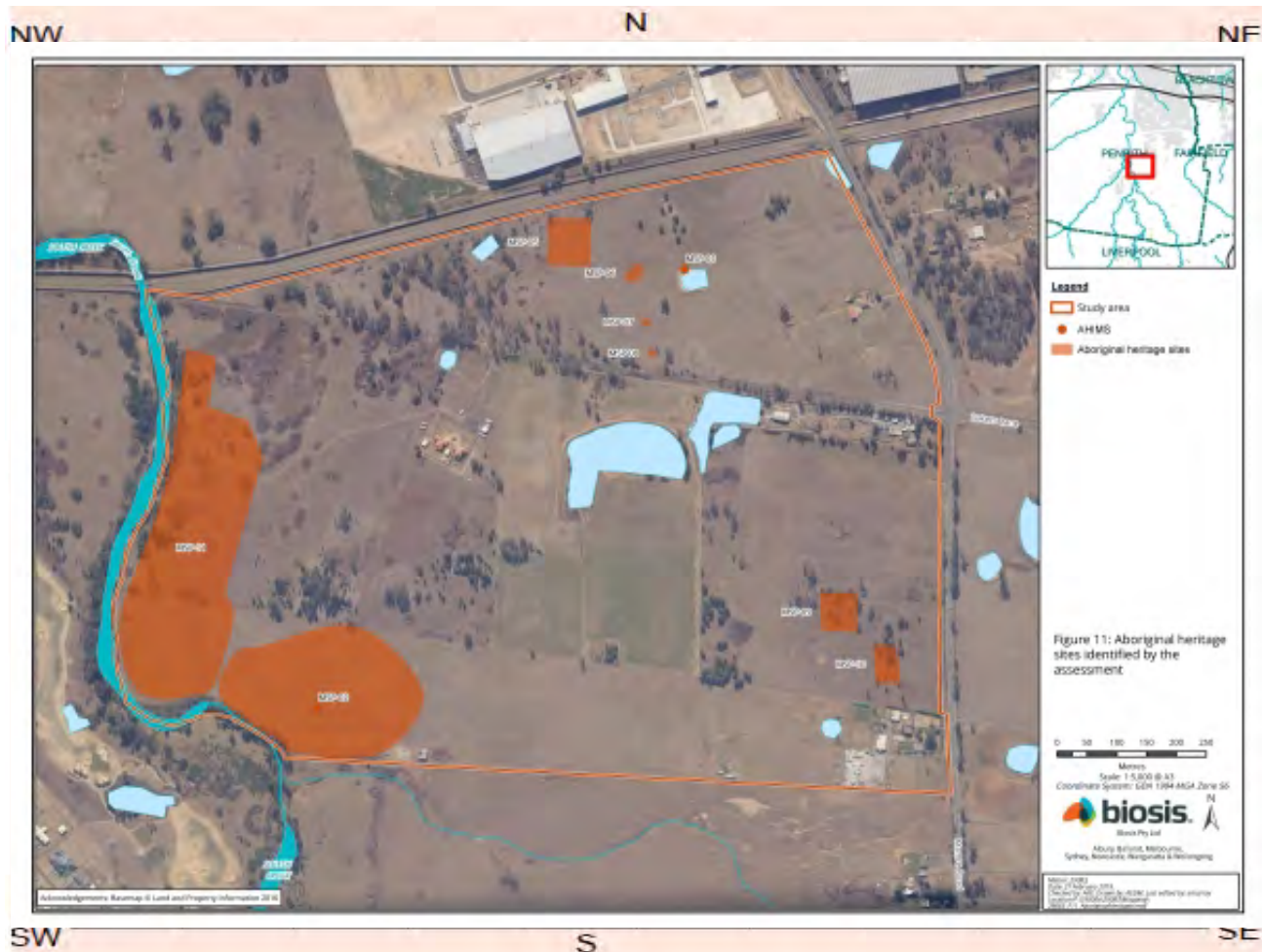
Distance to Water (m): 25 Primary Report: Biosis 2019. Mamre South Precinct ACHA

How to get to the site: The site is located across Lot 1 DP 1018318 and Lot 22 DP 258414, approximately 1130 meters west of Mamre Road, Kemps Creek. South Creek is located 90 metres south of the site.

Other site information: MSP-11 consists of a low density sub-surface artefact scatter found on a gentle slope landform. The site consists of 58 artefacts and is a common site type in the region. This site has been assessed with low scientific significance.



## Site location map



## Site contents information

open/closed site:

Site condition:

### Features:

Features:				Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)	Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
1.	Artefact	58	560	175						

### Description:

A total of 58 artefacts were identified at this site, comprising 33 angular fragments, 1 bipolar core, 9 complete flakes, 4 distal flakes, 3 proximal flakes, 1 grinding stone fragment, 2 longitudinal flakes, 3 medial flakes, 1 potlid and 1 single platform core.

### Features:

Features:	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)	Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
2.							

### Description:



**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
3.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

<input type="text"/>
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## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
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<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
4.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

<input type="text"/>
----------------------

## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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**Features:**

	Number of features	Length of feature(s) extent (m)	Width of feature (s) extent (m)
5.	<input type="text"/>	<input type="text"/>	<input type="text"/>

Description:

<input type="text"/>
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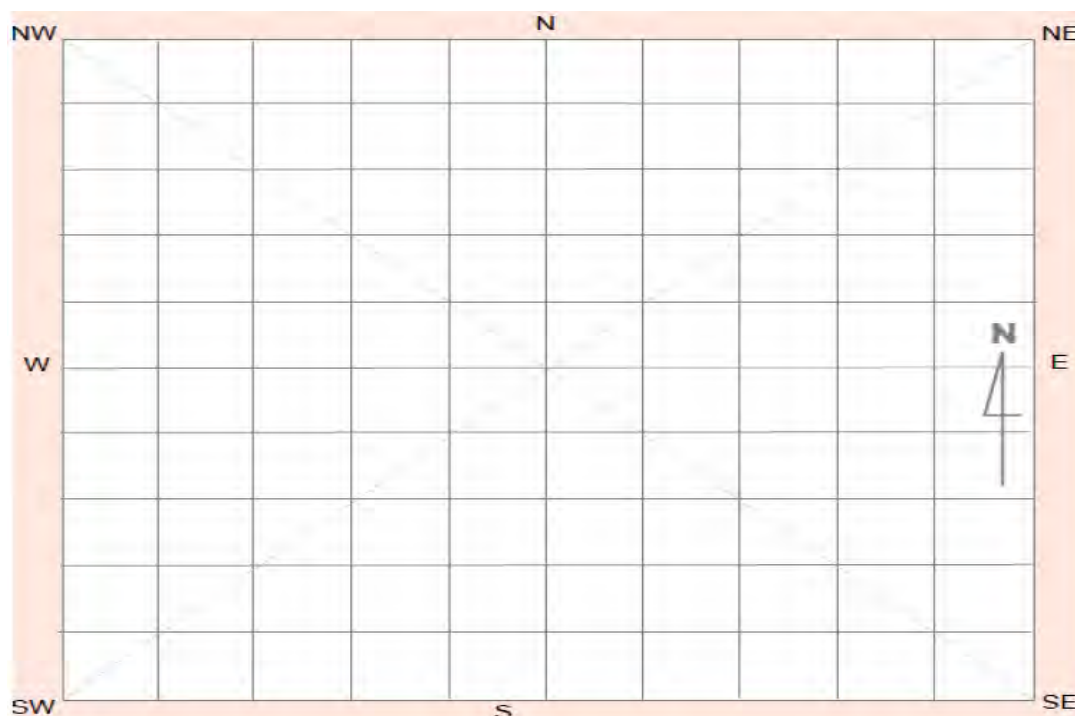
## Scarred Trees

Scar Depth (cm)	Regrowth (cm)	Scar shape	Tree Species
-----------------	---------------	------------	--------------

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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Other Site Info:

MSP-11 consists of a low density sub-surface artefact scatter found on a gentle slope landform. The site consists of 58 artefacts and is a common site type in the region. This site has been assessed with low scientific significance.

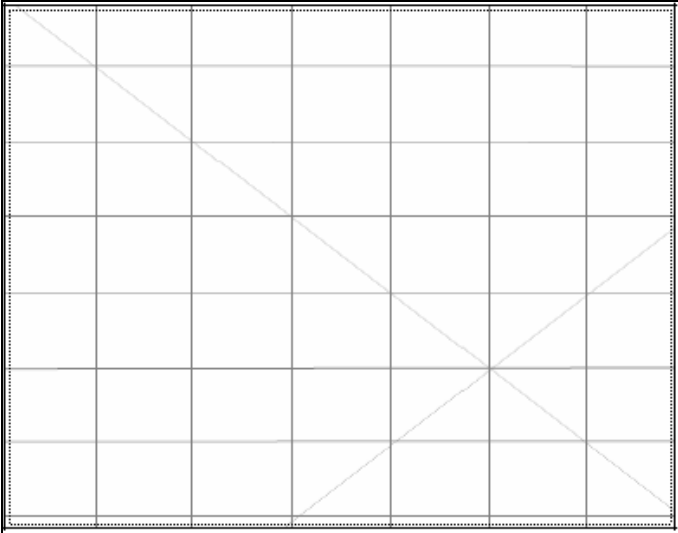
**Site plan**



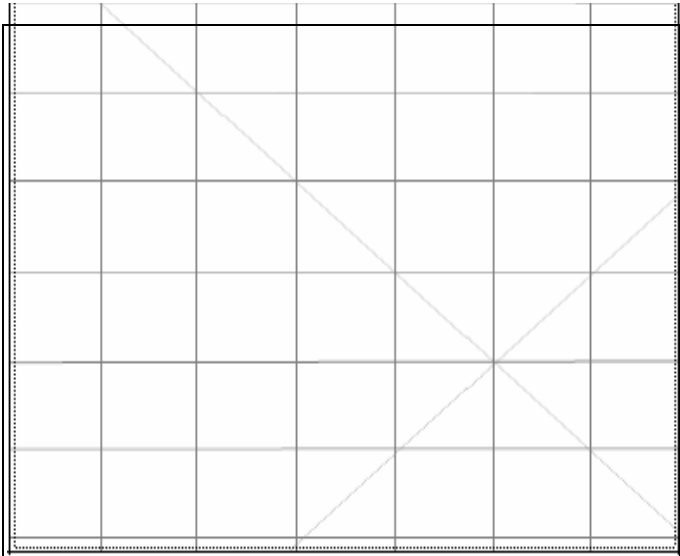
Site photographs



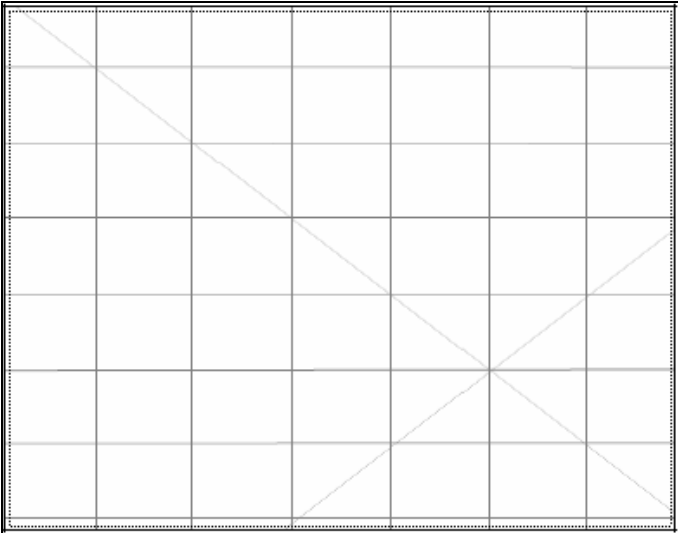
Description:



Description:



Description:



Description:

Site restrictions

Do you want to Restrict this site?:

Restriction type: 

Gender

General

Location

Why is this site restricted?:

Further information contact

Title

Surname

First name

Organisation:

Address:

Phone:

E-mail:



## Appendix G: Aboriginal cultural heritage addendum report: Re-survey of Lot X DP 421633

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11 February 2021

Michaela Leerdam  
Acquisitions & Infrastructure Coordinator  
Fraser's Property Industrial  
Level 2, 1C Homebush Bay Drive  
Rhodes NSW 2138

Dear Michaela

**Re: Aboriginal cultural heritage addendum report: Re-survey of Lot X DP 421633**  
**Our Ref: Matter 34009**

Biosis Pty Ltd (Biosis) has been commissioned by Fraser's Property Industrial to re-survey Lot X DP 421633 as an addendum to the existing CHMP (Biosis 2020a), as per Condition B37 of the draft Conditions of Consent for the study area (SSD-9522) (CoC file no. EF19/12408), located at 657-769 Mamre Road, Kemps Creek, New South Wales (NSW) (the project).

The project involves the creation of an industrial estate that will include earthworks and the development of industrial infrastructure. The study area will be subdivided into lots of 1 to 3 hectares. Access to the new industrial estate will be provided via the new Southern Link Road, Bakers Lane, and from a new estate access road off Mamre Road, within the southern portion of the study area.

A portion of the study area (Lot X DP 421633) was re-surveyed on 17 November 2020 to satisfy the draft CoC and was conducted by Biosis Archaeologist Ashley Bridge and Aboriginal representatives from Darug Custodian Aboriginal Corporation (DCAC) and Murra Bidgee Mullangari Aboriginal Corporation.

The *National Parks and Wildlife Act 1974* (NPW Act) provides specific protection for Aboriginal objects and declared Aboriginal places by establishing offences of harm. Harm is defined to mean destroying, defacing, damaging or moving an object from the land. There are a number of defences and exemptions to the offence of harming an Aboriginal object or place. The NPW Act states that a person or organisation who exercises due diligence in determining that their actions will not harm Aboriginal objects has a defence against prosecution for the strict liability offence of unknowingly harming an object without an AHIP.

This addendum letter includes a summation of background research, as well as the results of the archaeological survey undertaken in accordance with *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010a) (the due diligence code), in order to adequately map areas of high, moderate and low archaeological sensitivity. It is useful to determine whether the due diligence code is applicable to the proposed project. The due diligence code outlines a series of questions to clarify this, responses to these questions are outlined in Table 1 as they relate to Lot X DP 421633.

**Table 1 Questions required to determine the applicability of the due diligence code**

Question	Response
Is the activity a declared project under Part 3A of the EP&A Act?	No

Biosis Pty Ltd  
Sydney

Unit 14, 17-27 Power Avenue  
Alexandria NSW 2015

Phone: 02 9101 8700

ACN 006 175 097  
ABN 65 006 175 097

Email: [sydney@biosis.com.au](mailto:sydney@biosis.com.au)

[biosis.com.au](http://biosis.com.au)



Question	Response
Is the activity an exempt activity listed in the NPW Act or other legislation?	No
Will the activity involve harm that is trivial or negligible?	No
Is the activity in an Aboriginal place or are you already aware of Aboriginal objects on the land?	No
Is the activity a low impact activity for which there is a defence in the NPW Regulation?	No
Do you want to use an industry specific code of practice?	No
Do you wish to follow your own procedure?	No

As none of the above questions apply to the project, due diligence must be established through using the due diligence code. The due diligence code consist of a series of five steps outlined below.

### Step 1: Will the activity disturb the ground surface or any culturally modified trees?

The project proposes to develop an industrial estate that will include associated industrial infrastructure. These works include bulk earthworks, subdivision of land, vegetation clearance, stockpiling and installation of foundations and footings throughout Lot X DP 421633.

As the activity will disturb the ground surface, consideration of Steps 2a and 2b of the due diligence code is required.

### Step 2a. Search the Aboriginal Heritage Information Management System (AHIMS) database and use any other sources of information of which you are already aware

An extensive search of the AHIMS database was conducted on 14 October 2020 (Client service ID: 542421). The search identified 38 Aboriginal archaeological sites within a 1 kilometre search area, centred on the proposed study area (Table 2). Thirteen of these registered sites are located within 200 metres of the study area, including MSP-01(AHIMS 45-5-5187), MSP-02 (AHIMS# 45-5-5188), MSP-03 (AHIMS# 45-5-5189), MSP-05 (AHIMS# 45-5-5340), MSP-06 (AHIMS# 45-5-5341), MSP-07 (AHIMS# 45-5-5342), MSP-08 (AHIMS# 45-5-5343), MSP-09 (AHIMS# 45-5-5344), MSP-10 (AHIMS# 45-5-5345), MSP-11 (AHIMS# 45-5-5346), EPTA3 (AHIMS 45-5-3028), EPTA10 (AHIMS 45-5-3032), and EPTA11 (AHIMS 45-5-3033) (Figure 3). A review of site cards EPTA3 (AHIMS 45-5-3028), EPTA10 (AHIMS 45-5-3032), EPTA11 (AHIMS 45-5-3033) identified their locations to be incorrect. The mapping coordinates recorded for these sites were checked for consistency with their descriptions and location on maps from Aboriginal heritage reports where available. These descriptions and maps were relied where notable discrepancies occurred.

**Table 2 AHIMS Sites within the vicinity of the study area**

Site type	Occurrences	Frequency (%)
Artefact	38	95%
PAD	2	5%
<b>Total</b>	40	100%



A simple analysis of the Aboriginal cultural heritage sites registered within 1km of the study area indicates that the dominant site type is artefact, representing 95 % (n=38). This was followed by PAD, representing 5% (n=2). A majority of previously recorded AHIMS sites appear to have been recorded within the proximity of South Creek and Cosgrove's Creek to the west upon alluvial flood plains within the South Creek soil landscape, or upon well drained topographies such as hillslopes, spurs of crests, to the east nearby Kemps Creek and other lower order tributaries of South Creek, within Luddenham and Blacktown soil landscapes overlying Bringelly shales.

A review of the reports held by AHIMS identified several archaeological studies have been undertaken within and adjacent to the locality of the study area. These include:

- Dallas (1988) conducted a survey which included the western portion of the study area, located on and around low lying flood prone land between Cosgrove's Creek and South Creek. The survey identified twelve artefact sites, all open camp sites. The predictive model for the study identified the potential for artefact sites, scarred trees, and grinding grooves to be present within the study area. The potential for subsurface deposits was identified for three of twelve sites, situated on well drained topographies overlooking South Creek.
- Dominic Steele Consulting Archaeology (2001) developed a research design plan for an archaeological investigation to take place in the same area studied by Dallas (1988). Steele noted the presence of silcrete cobbles (a possible source of raw material for stone artefact production) in the area. It was also noted within predictive modelling that previous finds on the site were well dispersed, with disturbance having been caused by flooding activities, as well as the presence of stock in the study area. The possibility existed that further isolated artefactual material was present along Cosgrove's Creek, but given the degree of disturbance, it was unlikely that such material would be substantial, significant or undisturbed (Dominic Steele Consulting Archaeology 2001, p.29). Given the dominant presence of fluvial soils within the current study area, it is possible that similar conditions exist throughout the extent of the study area.
- Biosis Pty Ltd (2016) undertook an ACHA for City Plan Services on behalf of Altis Property Partners including a field survey in 2015 and test excavations in 2016 for the Mamre West Precinct development, located adjacently north of the study area. The field survey identified one previously unrecorded Aboriginal site, and areas of low, moderate and high potential were identified. Test excavations were undertaken in 2016 within the SSD application area directly north of the current study area. Four areas determined to be of high significance were excavated across a total of 164 test pits. A total of 81 artefacts were recovered during test excavations. All four sites are located within the same landform, across two soil landscapes. All four sites consisted of low density artefact scatters that generally showed an increase in artefact density in areas where yellow earth soils were present. Silcrete was the dominant raw material type across the study area and one glass artefact was identified. The assemblage consisted of flakes, flaked pieces and cores, with only two flakes exhibiting retouch. No backed artefacts were recovered. Of the four areas excavated, site MWP-AD2 and MWP-AD4 were assessed to have low significance, MWP-AD1 was assessed as possessing moderate archaeological significance, and MWP-AD4 was assessed possessing high significance, with the highest total of artefacts at 34, scattered across an area of 120 metres by 100 metres.
- Biosis (2018) completed a survey report for the current SSD application area for Altis Property Partners and Frasers Property Industrial Constructions in order to identify Aboriginal sites or areas of archaeological potential that might be present within the study area. A search of the AHIMS database identified three AHIMS sites within the study area; EPTA3 (AHIMS 45-5-3028), EPTA10



(AHIMS 45-5-3032), and EPTA11 (AHIMS 45-5-3033). As part of the field survey these site locations were inspected in an attempt to relocate the Aboriginal heritage items. No evidence of the three AHIMS sites was identified. A total of four previously unrecorded Aboriginal sites were recorded during the survey, including three artefact scatters and an isolated artefact MSP-01(AHIMS 45-5-5187), MSP-02 (AHIMS 45-5-5188), MSP-03 (AHIMS 45-5-5189), and MSP-04 (AHIMS 45-5-5190). Silcrete was the dominant raw material among the artefacts identified within the area surveyed. Three of the four sites are located within the current study area MSP-01(AHIMS 45-5-5187), MSP-02 (AHIMS 45-5-5188) and MSP-03 (AHIMS 45-5-5189). Another site, MSP-04 (AHIMS 45-5-5190) was located during the survey, but this is south of the current study area. An extensive area of high archaeological potential was identified adjacent to the extent of South Creek, within the western portion of the study area. Two additional areas of moderate archaeological potential were also identified upon highpoints within the eastern portion of the study area. A large central portion of the SSD application area (Lot X DP 421633) was un-surveyable due to access restrictions. This portion of the SSD application area is to be surveyed as part of the current investigation.

- Biosis Pty Ltd (2018) were commissioned by HB+B Property on behalf of Altis Property Partners to undertake Aboriginal archaeological test excavations for the proposed channel realignment 850 metres north of the study area, as part of the Mamre West Precinct SSD. Fifty-six test pits measuring 50 by 50 centimetres were excavated across 5 transects. Soil deposits along Transect 1 and Transect 2 within the eastern portion of the proposed realignment area were shallow (at less than 30 centimetres) with very little topsoil remaining and consisting of silty clay to clay. Only two artefacts were recovered from a single test pit in Transect 2, and were assessed to have low archaeological significance. Soil depth varied within the western portion of the proposed realignment and some natural soil deposits were overlaid with a rubble fill. The results of the test excavations identified an overall low artefact density of 1.57 artefacts per square metre across the site. A maximum of four artefacts to one test pit was reached. It was determined that the eastern portion of the area that was excavated may have previously been swampland and the lack of topsoil, level of historical disturbance and erosion, proximity of the first order drainage line, and position of the area as a low lying landform, may account for the lack of archaeological deposit within this area. The relatively higher ground within the western portion of the study area was considered a more likely site for Aboriginal occupation.
- Biosis (2020b) conducted an ACHA for the current SSD application area for Altis Property Partners and Frasers Property Industrial Constructions. A survey of the site included Lot X DP 421633 targeting areas of exposure, such as the dam walls and did not identify Aboriginal sites. The survey was impacted by the presence of a dense crop within the lot. Test excavation program within the areas of potential identified within the Biosis (2018 and 2020b) survey and ACHA reports. The results of these test excavations identified sub-surface deposits in all three areas of potential. OA1 and OA2 were two areas of moderate potential located the furthest distance from water and both contained low density artefact deposits, while a high density artefact deposit was identified at OA3 which was located closer to South Creek and was assessed to contain high potential. The assemblage at OA3 contained a varied artefact deposit including a number of backed artefacts which placed it within the Middle Bondaian phase of occupation, approximately 4,000 to 1,000 years before present. Overall a total of a total of 274 test pits were excavated across 37 transects and 691 artefacts were recovered. The highest density of artefacts were recorded at OA3, which contained 666 artefacts out of 158 excavated test pits. Artefacts included, angular fragments, bipolar cores, compete flakes, distal flakes, glass fragments, grinding base, grinding fragment, flake



core, heat shatter, longitudinal flakes, medial flakes, multi-platform cores, potlid, proximal flakes, redirecting flake, and single platform cores. A number of tools were also present, including Bondi points, geometric microliths, backed artefact fragments, deep edged scrapers, Eloura, Dihedral burin, and notched tools. Materials present included chert, indurated mudstone tuff, petrified wood, quartz, quartzite, tuff, silcrete and siltstone. The evidence gathered during the archaeological test excavations of OA1 OA2 and OA3 indicates that OA3 was likely a long term camp site with backed artefact manufacturing occurring at the site due to the diverse assemblage present. It was recommended that sites be avoided by the development, and if unavoidable, a surface salvage take place prior to development.

## **Step 2b. Activities in areas where landscape features indicate the presence of Aboriginal objects**

In order to determine whether the activity within landscape features likely to contain Aboriginal objects a review of information pertaining to ethnohistories, soils, geology, landform, disturbance and potential resources has been undertaken.

### **Ethnohistory**

It is generally accepted that Aboriginal people have inhabited the Australian landmass for the last 65,000 years (Clarkson et al. 2017). Dates of the earliest occupation of the continent by Aboriginal people are subject to continued revision as more research is undertaken. The timing for the human occupation of the Sydney Basin is still uncertain. While there is some possible evidence for occupation of the region around 40,000 years ago, the earliest known radiocarbon date for the Aboriginal occupation of the Sydney Basin is associated with a cultural/archaeological deposit at Parramatta, which was dated to 30,735 ± 407 BP (Jo McDonald Cultural Heritage Management 2005, 2005).

Archaeological evidence of Aboriginal occupation of the Cumberland Plains indicates that the area was intensively occupied from approximately 4000 years BP (Dallas 1982). Such 'young' dates are probably more a reflection of the conditions associated with the preservation of this evidence and the areas that have been subject to surface and subsurface archaeological investigations, rather than actual evidence of the Aboriginal people prior to this time.

Despite a proliferation of Aboriginal heritage sites there is considerable ongoing debate about the nature, territory and range of pre-contact Aboriginal language groups in the greater Sydney region. These debates have arisen largely because, by the time colonial diarists, missionaries and proto-anthropologists began making detailed records of Aboriginal people in the late 19th century; pre-European Aboriginal groups had been broken up and reconfigured by European settlement activity. The following information relating to Aboriginal people on the Cumberland Plains is based on such early records.

There is some confusion relating to group names, which can be explained by the use of differing terminologies in early historical references. Language groups were not the main political or social units in Aboriginal life. Instead, land custodianship and ownership centred on the smaller named groups that comprised the broader language grouping. There is some variation in the terminology used to categorise these smaller groups; the terms used by Attenbrow (2002) will be used here. Attenbrow (2002, p.34) suggests that a total of four dialects were spoken in the Sydney region:

- Darug coastal dialect/s - the Sydney Peninsula (north of Botany Bay, south of Port Jackson, west to Parramatta), as well as the country to the north of Port Jackson, possibly as far as Broken Bay.



- Darug hinterland dialect - on the Cumberland Plain from Appin in the south to the Hawkesbury River in the north; west of the Georges River, Parramatta, the Lane Cove River and Berowra Creek.
- Dharawal - from south side of Botany Bay, extending south as far as the Shoalhaven River; from the coast to the Georges River and Appin, and possibly as far west as Camden.
- Gundungurra - southern rim of the Cumberland Plain west of the Georges River, as well as the southern Blue Mountains.

Early interactions between local Aboriginal groups in the Sydney region and European settlers varied in nature between peaceful and hostile. It was not long before the effects of colonisation proved detrimental to local groups, with farming practices employed by the settlers removing land that had until that point been used for subsistence (Attenbrow 2002).

Early observers made no note of the language of the local groups, and it was not until the latter part of the nineteenth century that the name Darug was used. Matthews (1901, p. 155, cited by Attenbrow 2002, p.32) stated that "The Dharuk speaking people adjoined the Tharawal on the north, extending along the coast to the Hawkesbury River, and inland to what are now Windsor, Penrith, Campbelltown, and intervening towns". Subsistence activities varied based on the local landscapes, with Darug groups closer to the coast employing different food sources and means of hunting in order to survive, compared to those further inland (Kelleher Nightingale Consulting 2010, p.10).

After the arrival of European settlers the movement of Aboriginal people became increasingly restricted. European expansion along the Cumberland Plain was swift and soon there had been considerable loss of land to agriculture. This led to violence and conflict between Europeans and Aboriginal people as both groups sought to compete for the same resources (Brookes & Associates et al. 2003, p.16). At the same time diseases such as small pox were having a devastating effect on the Aboriginal population. Death, starvation and disease were some of the disrupting factors that led to a reorganisation of the social practices of Aboriginal communities after European contact. The formation of new social groups and alliances were made as Aboriginal people sought to retain some semblance of their previous lifestyle.

### **Geology, soils and hydrology**

The study area is located within Cumberland Lowlands physiographic region that consists of low lying, gently undulating plains and low hills on Wianamatta Group shales and sandstones with a dense drainage net of predominantly northward flowing channels (Bannerman & Hazelton 1990a, p.2). The Wianamatta formation, which underlies the study area, tends to contain low relief landforms with well-developed drainage systems. This in turn makes water sources, which form an important part of the prehistoric landscape, easier to locate. These water sources can be good indicators of potential Aboriginal occupation.

The study area is contained within the Bringelly Shale sub-formation (Figure 4). This formation consists of a shale (claystone and siltstone), carbonaceous claystone, laminate and fine to medium-grained lithic sandstone (Bannerman & Hazelton 1990a, p.3). Aboriginal artefact scatter sites are common across this formation, as are potential archaeological deposits (PADs). The presence of underlying shale deposits suggests that sites commonly found within sandstone formations, such as grinding grooves and rock shelters/rock art, are less likely to be present.

Topographically, the entire study area is located on a broad formation of alluvial plains/flats sloping very gently down toward South Creek from the lower slope landforms along the eastern boundary of the study area (Figure 5). Riparian corridors along creeklines are also present. The alluvial plains landform pattern is defined as having extremely low relief (Speight 2009, p.59). Shallow to deep alluvial stream channels are



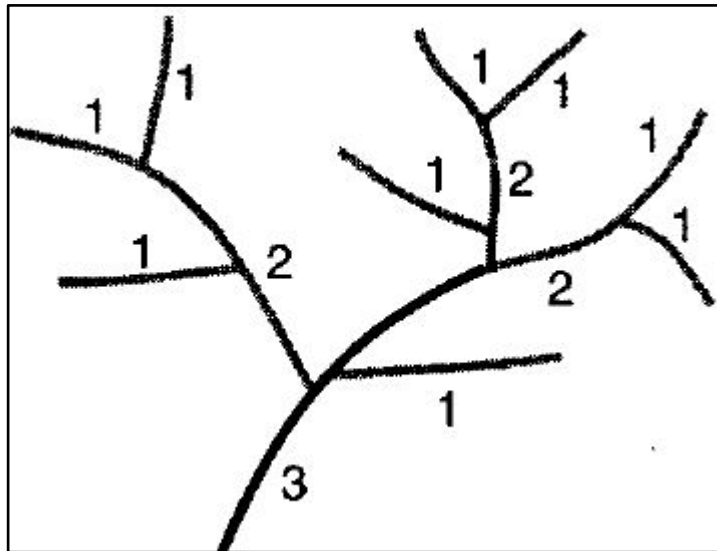
typically sparse to widely spaced, forming a unidirectional, integrated network. There may be frequently active erosion and aggradation by channelled and overbank stream flow, or the landforms can be relicts from these processes. Typical landform elements associated with alluvial plain landforms present within the study area include stream channels, levees, backswamps, and channel fill. Levees are very long, low, narrow, nearly level, sinuous ridges immediately adjacent to a stream channel built up by overbank flow; present on both sides of the stream channel as a result of periodic flooding and depositional events. During large floods the stream flows out of the channel and over the floodplain, resulting in both erosion and burial of cultural material. Old, abandoned channels also form an oxbow lake, or backswamp (Rapp & Hill 2006, p.69), and are present where deposits of fine silts and clays settle after a flood.

The geomorphological processes associated with alluvial plains are characterised by a high degree of sediment movement and deposition. It is therefore likely that Aboriginal artefacts will be present within an alluvial plain landform and they may have been displaced over time from their original location, or would be relatively intact after being deposited underneath new layers over time. Artefacts are most likely to be present within deep deposits formed by overbank flow within levees, the banks of backswamps and oxbow lakes.

Stream order is recognised as a factor which assists the development of predictive modelling, and has seen extensive use in the Sydney region, most notably by (Jo McDonald Cultural Heritage Management Pty Ltd 2000, 2005, 2005, 2006, 2008). Predictive models which have been developed for the region have a tendency to favour higher order streams as the locations of campsites as they would have been more likely to provide a stable source of water and by extension other resources which would have been used by Aboriginal groups.

The stream order system used for this assessment was originally developed by Strahler (1964), and works by adding streams together at their confluence to create a higher order stream, that is, two first order streams meet to form a second order stream, two second order streams meet to form a third order stream, and so on (Photo 1).





**Photo 1** Diagram showing Strahler stream order (Ritter et al. 1995, p.151)

As stream order increases, so does the likelihood that the stream would be a perennial source of water. Within the study area, South Creek, a sixth order perennial water course, flows north to south along the western boundary of the study area (Figure 5). A second order tributary of South Creek flows west to east adjacent to the southern boundary of the study area through a lower lying plain that extends south from the study area.

As a sixth order perennial water source, the proximity of South Creek can be considered a good indicator of the potential for Aboriginal occupation within the study area. Predictive modelling for the Cumberland Plains region suggests that artefact density and site complexity decreases in relation to decreasing Strahler order. Therefore, the artefact density and complexity of potential archaeological deposits will likely decrease with increasing distance from high Strahler order water sources, and subsequently with decreasing Strahler order (Jo McDonald Cultural Heritage Management 1997, Jo McDonald Cultural Heritage Management 2006, Dominic Steele Consulting Archaeology 2003, White & McDonald 2010).

There are two soil landscapes that have been defined as occurring in the study area, Blacktown and South Creek (Figure 6). Soil landscapes have distinct morphological and topological characteristics that result in specific archaeological potential. Because they are defined by a combination of soils, topography, vegetation and weathering conditions, soil landscapes are essentially terrain units that provide a useful way to summarise archaeological potential and exposure.

Blacktown soil landscape covers the eastern topographies of the study area. The Blacktown soil landscape is a residual landscape and consists of gently undulating rises, broad rounded crests and gently inclined slopes with a gradient of less than 5%. Local relief within the Blacktown soil landscape is up to 30 metres and rocky outcropping is absent. The soils are shallow to moderately deep at less than 100 centimetres, and can be hard setting with moderate erodability. Dominant soils consist of shallow to moderately deep (less than 100 centimetres) red and brown podzols on crests and on well drained topographies, and deep (150 to 300 centimetres) yellow podzolic soils and soloths on lower slopes and drainage lines (Bannerman & Hazelton 1990b, p.28). The dominant soil characteristics for the Blacktown landscape are summarised below in Table 3. The upper topsoil - *bt1*, is occasionally absent on crests and hill slopes, but boundaries between the soil materials are usually clear. Due to their age and slow accumulation residual soil landscapes have reasonable potential to contain archaeological deposits in an open context, such as stone



artefacts derived from occupation sites. Other occupational evidence may include scarred trees where remnant vegetation survives. However, slow accumulation and high impact of extensive land clearing (usually associated with pastoral and housing development) during more recent times often results in the poor preservation of archaeological material. Associated soil landscapes that occur in association to the Blacktown soil landscape include the South Creek soil landscape which occurs along drainage depressions.

**Table 3 Blacktown (*bt*) soil landscape characteristics (Hazelton & Tille 1990, pp.28–30)**

Soil Material	Description
Blacktown 1 ( <i>bt1</i> ) - Friable brownish-black loam	Friable brown loam to clay loam with a moderately pedal subangular block structure and rough-faced porous fabric ped fabric. This soil material generally occurs as a topsoil (A horizon). Peds are well defined and range from 2-20 millimetres. Rounded iron indurated fine gravel-sized shale fragments and charcoal fragments sometimes occur as inclusions. Soil colour is brownish black (10YR 2/2), and can also range from dark reddish brown (5YR 3/2) to dark yellowish brown (10YR 3/4). Soil varies from moderately acidic to neutral.
Blacktown 2 ( <i>bt2</i> ) - Hardsetting brown clay loam	Hardsetting brown clay loam to silty clay loam, with an apedal massive to weakly pedal structure and porous earthy fabric. Occurs as an A <sup>2</sup> Horizon soil deposit. Peds range from 20-50 millimetres. Platy, iron indurated gravel sized shale fragments are common, with rare inclusions of charcoal and roots. Soil colour is predominately dark brown (7.5YR 4/3), but can range from dark reddish brown (2.5YR 3/3) to dark brown (10YR 3/3). Soil acidity varies from moderately acidic to slightly acidic.
Blacktown 3 ( <i>bt3</i> ) - Strongly pedal, mottled brown light clay	Brown light to medium clay with strong pedal polyhedral or subangular-blocky structure and smooth faced dense ped fabric that occurs as a subsoil (B horizon). The soil texture increases with depth and peds range from 5-20 millimetres. Fine to coarse gravel sized shale fragments are a common inclusion and often occur within stratified bands, with roots and charcoal rarely being present. Soil colour is brown (7.5YR 4/6), and can range from reddish brown (2.5YR 2/6) to brown (10YR 4/6). The pH of this soil material varies from strongly acidic to slightly acidic.
Blacktown 4 ( <i>bt4</i> ) - Light grey plastic mottled clay	Plastic light grey silty clay to heavy clay with moderately pedal polyhedral to subangular blocky structure, and smooth-faced dense ped fabric, that occurs as a deep subsoil deposit overlying shale bedrock (B <sup>3</sup> or C Horizon). Peds range between 2-20 millimetres. Inclusion consists of weathered ironstone concretions and rock fragments. Gravel sized shale fragments and roots occur occasionally, but charcoal is rare within this soil deposit. Red, yellow and brown mottles are present and soil colour is usually light grey (10YR 7/1) or sometimes greyish yellow (2.5YR 6/2). Soil acidity ranges from strongly acidic to moderately acidic.

South Creek soil landscape dominates the western portion of the study area and is associated with drainage depressions and alluvial flats within the area (Bannerman & Hazelton 1990a, pp.68–71). The South Creek soil landscape is characterised as a fluvial soil landscape situated on flat to gently sloping alluvial plains with a gradient of less than 5%, and a local relief of up to 10 metres, with intermittent terraces or levees present. Soils are generally very deep (135-190 centimetres) layered sediments over bedrock or relief soils, with red and yellow podzolic soils being predominant upon terraces, with some structured grey clays, leached clay and yellow solodic soils also occurring. In areas adjacent to drainage lines where soil evolution has occurred structured plastic clays and structured loams can also be present (Bannerman & Hazelton 1990b, pp.68–69).



On high terraces South Creek 1 (sc1) and South Creek 2 (sc2) soils are usually absent and the soils consist of up to 190cm of stratified light to medium clay over shale bedrock (sc3) (Bannerman & Hazelton 1990a, p.70). Pockets of sand or clayey sand also occur as splay or flat deposits from alluvial overflow on floodplains. This is a dynamic landscape associated with active floodplains, resulting in both soil erodibility and deposition. In depositional phases streams may be partially or completely blocked by sedimentation. Fine sands and finer fractions, such as silts and clays are indicative of very low-energy regimes like overbank floodplain deposits (Rapp & Hill 2006, p.69). This soil landscape therefore varies in many areas from erosion to deposition and has the potential to disturb soil sequencing and potentially archaeological deposits. During periods when erosion and deposition do not occur, there are stable surfaces for human occupation. Artefacts in these deposits may have been buried soon after human occupation and may be in their primary context (i.e. *in situ*). Characteristics of dominant soil materials within the South Creek soil landscape are summarised in Table 4.

**Table 4 South Creek (sc) soil landscape characteristics (Bannerman & Hazelton 1990b, p.69)**

Soil Material	Description
South Creek 1 (sc1) – Brown apedal single-grained loam	Brown sandy loam to sandy clay loam with a porous and earthy fabric, and a single-grained apedal structure, usually occurring as a topsoil (A horizon). Roots are abundant in surface layers, while small angular or rounded gravels of 2-6 millimetres may occur; other inclusions, such as charcoal, do not occur. Colours range from a dull reddish brown 95YR 4/3 to dull yellowish brown (10YR 4/3), and are generally moderately acidic but can vary between strongly to slightly acidic.
South Creek 2 (sc2) – Dull brown clay loam	A hard setting dull brown clay loam to sandy clay loam, usually featuring an apedal massive structure and porous, earthy fabric, occurring as a topsoil (A horizon). There may be occasional areas of weak structure which contain small (2-5 mm) rough-faced subangular blocky peds. Roots are rare and stone and other inclusions do not occur. Colour is generally a dull brown (7.5YR 5/4), but can vary from greyish brown (5YR 4/2) to yellowish brown (10YR 5/6). Ranges from moderately acidic to neutral acidity.
South Creek 3 (sc3) – Bright brown clay	A bright brown light to medium clay with a strong pedal structure and dense smooth-faced angular blocky or polyhedral ped fabric (20-50mm in size), usually presenting as a subsoil (B horizon). Occasionally contains enough levels of sand to be classified as a sandy clay. Usually whole coloured, ranging from reddish brown (3YR 4/8) to bright yellowish brown (10YR 5/1), with highly variable pH levels from extremely acidic to neutral. Yellow or grey mottling can occur, and may occupy up to 15% of material volume. Where this madeira presents as a topsoil there may be roots. Small subrounded or subangular gravel (2-20mm) can make up to 50% of the volume, and no charcoal is present.

## Resources

The Cumberland Plains region would have provided an abundance of natural resources able to be utilised in a variety of ways by Aboriginal people. Plant fibres were twisted into string, which was used for many purposes, including the weaving of nets, baskets and fishing lines. String was also used for personal adornment. Bark was used in the provision of shelter; a large sheet of bark being propped against a stick to form a gnyah (Attenbrow 2002, pp.113–114).



Current aerial photography shows that beyond the riparian corridor, the study area has been extensively cleared except for a few small stands of remnant vegetation throughout the area. Remnant vegetation within the study area is likely to include a mixture of native Flora associated with the Blacktown and South Creek soil landscapes, and introduced species. Vegetation within the South Creek soil landscape reflects the soil landscapes frequent inundation, which supports common tree species such as the broad-leaved apple *Angophora subvelutina*, Cabbage Gum *Eucalyptus amplifolia*, and Swamp Oak *Casuarina glauca*. Tall spike rushes (such as *Eleocharis sphacelata*, *Juncus usilatus* and *Polygonum*), have the potential to occur where channels are silted. Upon elevated streambanks tall shrubland consisting of Paperbarks *Melaleuca*, and Tea Trees *Leptospermum* may also occur. However, the South Creek soil landscape has been extensively cleared, and as a direct result is now dominated by noxious weeds, such as Blackberry *Rubus vugalris* (Bannerman & Hazelton 1990b, pp.68–69).

The Blacktown soil landscape would have typically supported open-forest and open-woodland that has been extensively cleared since European contact. Originally the Blacktown soil landscape would have featured woodland and open-forest of Forest Red Gum *Eucalyptus tereticornis*, Narrow-leaved Ironbark *Eucalyptus crebra*, Grey Box *Eucalyptus moluccana*, and Spotted Gum *Corymbia maculata* (Bannerman & Hazelton 1990b, p.29).

Animal products were also used for tool making and fashioning a myriad of utilitarian and ceremonial items. For example, tail sinews are known to have been used to make fastening cord, while 'bone points', which would have functioned as awls or piercers, are often an abundant part of the archaeological record. Brush-tailed Possums were highly prized for their fur and could be fashioned into a cloak (Attenbrow 2002, p.117).

The accessibility of water is a strong indication as to the likelihood for the presence of Aboriginal sites. Rivers, creeks and waterholes provide sources of fresh drinking water, whilst also supplying a habitat for fish and shellfish resources. The presence of permanent water sources would have also attracted a number of animals to the area, that would have been hunted by Aboriginal people (Attenbrow 2002, pp.62–76). Native Fauna that could have been present in the study areas includes, but is not limited to the Australian Brush Tail Possum *Trichosurus vulpecula*, Short-beaked Echidna *Tachyglossus aculeatus*, Swamp Wallaby *Wallabia bicolor*, Rainbow Lorikeet *Trichoglossus moluccanus*, Kookaburra *Dacelo novaeguineae*, Australian Magpie *Cracticus tibicen*, Water Dragon *Intellagama lesueurii*, and Eastern Blue-Tongue *Tiliqua scincoides*.

## Disturbances

Historically, the area along Mamre Road has been used for farming and pastoral practices, as well as the establishment of large estates, such as Mamre House, approximately 3 kilometres north of the current study area (Thorpe 1986). As such it would not be unreasonable to expect the study area had undergone disturbance from activities such as ploughing and grazing. It is firmly established in both Aboriginal and historical archaeology (Brooks et al. 2009, Steinberg 1996) that agriculture, and in particular ploughing, causes extensive disturbance to the upper levels of soil profiles on many sites, with Steinberg claiming that this disturbance extends to approximately 30 centimetres below the surface. These activities disturb the original context of archaeological deposits, redistributing their contents across the ploughed area and disrupting the stratigraphic profiles of the area.

The study area encompasses three initial grants from the 18 December 1805, made up of two 300 acre grants to Ezekiel/Edward Wood (Kingswood) and Richard Fitzgerald (Restitution Farm), and a portion of a 360 acre grand to James Scott (Figure 7). All grants appear to have been historically used as farms, however Richard Fitzgerald was a notable convict with associations with both John MacArthur and Lachlan



Macquarie. There is the potential for the study area to contain remains of early homesteads dating to the early nineteenth century.

Historical aerial photographs provide further information on how the land within the study area has been used (Figure 7). Aerial photographs of the study area dated to 1955 show the study area was primarily used for agricultural and pastoral purposes at this point in time, with the land initially cleared of vegetation and crop lines and dam visible. An aerial photograph dated to 1986 shows continued agricultural use with evidence of crop lines and damming present throughout. Three residential structures had also been constructed along the eastern border.

An aerial photograph dated to 2005 shows significant disturbance had occurred within the study area through the construction of a large dam (Figure 7). Extensive use of the land for agricultural practices is evident in the crop lines throughout Lot X DP 421633, adjacently south and to the east within the study area. Current aerial photographs show little change has occurred, with cropping continued within these areas (Figure 2).

### **Step 3. Can you avoid harm to the object or disturbance of the landscape feature?**

It is not possible to avoid harm to the landscape as the proposed development involves vegetation clearance, demolition, bulk earthworks, subdivision, construction of industrial infrastructure and buildings, and civil engineering works such as the construction of roads, stormwater drainages, sewer works, and water supply works. All of which will cause significant disturbance within the area.

### **Step 4: Desktop assessment and visual inspection**

#### **Desktop assessment**

Based upon the results from Stages 2a and 2b of the due diligence code a model has been formulated to broadly predict the type and character of Aboriginal cultural heritage sites likely to exist throughout the study area and where they are more likely to be located.

This model is based on:

- Local and regional site distribution in relation to landform features identified within the study area.
- Consideration of site type, raw material types and site densities likely to be present within the study area.
- Findings of the ethnohistorical research on the potential for material traces to present within the study area.
- Potential Aboriginal use of natural resources present or once present within the study area.
- Consideration of the temporal and spatial relationships of sites within the study area and surrounding region.

Based on this information, a predictive model has been developed, indicating the site types most likely to be encountered during the survey and subsequent sub-surface investigations across the present study area (Table 5). The definition of each site type is described firstly, followed by the predicted likelihood of this site type occurring within the study area.



**Table 5 Aboriginal site prediction statements**

Site type	Site description	Potential
<b>Flaked stone artefact scatters and isolated artefacts</b>	Artefact scatter sites can range from high-density concentrations of flaked stone and ground stone artefacts to sparse, low-density 'background' scatters and isolated finds.	Moderate: Three artefact sites are also located within 200 metres of the study area. However, the study area is not within close proximity to a perennial water course.
<b>Potential Archaeological Deposits (PADs)</b>	Potential sub surface deposits of cultural material.	Moderate: This site has previously been recorded within the Blacktown soil landscape, within the eastern portion of the study area. PAD sites also have the potential to occur within alluvial landforms though they may not be in situ. This site type represents the second most commonly recorded site type within the vicinity of the study area, however disturbance is visible. Therefore it PAD sites have been assessed to have moderate potential to occur within the study area.
<b>Shell middens</b>	Deposits of shells accumulated over either singular large resource gathering events or over longer periods of time.	Low: Shell midden sites have not been recorded within the vicinity of the study area. There is a very low potential for shell middens to be located in the study area as no drainage lines are present within Lot X DP 421633.
<b>Quarries</b>	Raw stone material procurement sites.	Low: There is no record of any quarries being within or surrounding the study area.
<b>Scarred trees</b>	Trees with cultural modifications	Low: Scarred trees have not been recorded within the vicinity of the study area. Due to extensive vegetation clearance only a limited number of mature native trees have survived.
<b>Grinding grooves</b>	Grooves created in stone platforms through ground stone tool manufacture.	Low: The underlying geography provides suitable horizontal sandstone rock outcrops could occur along drainage lines, however no drainage lines are present within Lot X DP 421633. Therefore there is low potential for grinding grooves.
<b>Burials</b>	Aboriginal burial sites.	Low: Aboriginal burial sites are generally situated within deep, soft sediments, caves or hollow trees. Areas of deep sandy deposits will have the potential for



Site type	Site description	Potential
		Aboriginal burials. The soil profiles associated with the study area are not commonly associated with burials.
<b>Aboriginal Ceremony and Dreaming sites</b>	Such sites are often intangible places and features and are identified through oral histories, ethnohistoric data, or Aboriginal informants.	Low: There are currently no recorded mythological stories for the study area.
<b>Post-contact sites</b>	These are sites relating to the shared history of Aboriginal and non-Aboriginal people of an area and may include places such as missions, massacre sites, post-contact camp sites and buildings associated with post-contact Aboriginal use.	Low: There are no post-contact sites previously recorded in the study area and historical sources do not identify one.
<b>Aboriginal places</b>	Aboriginal places may not contain any 'archaeological' indicators of a site, but are nonetheless important to Aboriginal people. They may be places of cultural, spiritual or historic significance. Often they are places tied to community history and may include natural features (such as swimming and fishing holes), places where Aboriginal political events commenced or particular buildings.	Low: There are currently no recorded Aboriginal historical associations for the study area.
<b>Rock shelters with art and / or deposit</b>	Rock shelter sites include rock overhangs, shelters or caves, and generally occur on, or next to, moderate to steeply sloping ground characterised by cliff lines and escarpments. These naturally formed features may contain rock art, stone artefacts or midden deposits and may also be associated with grinding grooves.	Nil: The sites will only occur where suitable sandstone exposures or overhangs possessing sufficient sheltered space exist, which are not present within the study area.

## Visual inspection

A visual inspection of the study area was undertaken on 17 November 2020 by Biosis Archaeologist Ashley Bridge and Aboriginal representatives from Darug Custodian Aboriginal Corporation (DCAC) and Murra Bidgee Mullangari Aboriginal Corporation. The visual inspection consisted of a systematic re-survey of Lot X DP 421633, whereby two meandering transects were conducted on foot to identify and record any Aboriginal archaeological sites visible on the surface or areas of Aboriginal archaeological potential and cultural sensitivity. Transects were walked across the alluvial plains/flats landforms with the three surveyors walking approximately two metres apart. This follows the methodology set out in Burke and Smith (2004, p.65), which states that a single person can only effectively visually survey an area of two linear metres. The methods used during the visual inspection also conformed to Requirements 5 to 8 of the *Code of Practice for*



*Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b). For terminology and definitions used within this section, please refer to the aforementioned guideline.

No Aboriginal surface artefacts or areas of archaeological potential were identified during the field investigation. Small sections of remaining mature vegetation within the lot was also inspected for cultural scarring. No scarred trees were identified.

In most archaeological reports and guidelines ground surface visibility (GSV) is usually expressed as a percentage estimate of the ground surface that is visible, and is considered in relation to the likelihood of detecting artefacts (usually stone) that may be present on the ground surface (DECCW 2010b). While GSV throughout the lot was significantly better than at the time of the original survey efforts, the remnants of the slashed vegetation and pockets of extensive grass coverage still obscured the ground surface. Overall, the lot displayed GSV of around 20 % (Photo 2 and Photo 3). A small portion of the lot, comprising of a stand of trees, contained extensive grass coverage throughout, suggesting that the machine used to clear the grass and vegetation could not maneuver around the trees. Throughout this area GSV was recorded as 0 %.



**Photo 2** GSV throughout transect 1, facing south



**Photo 3** GSV throughout transect 2, facing east





**Photo 4** GSV throughout transect 2, facing west

Exposure, refers to the geomorphic conditions of the local landform being surveyed, attempts to describe the relationship between those conditions and the likelihood the prevailing conditions provide for the exposure of (buried) archaeological materials. Whilst also usually expressed as a percentage estimate, exposure is different to visibility in that it is in part a summation of geomorphic processes, rather than a simple observation of the ground surface (Burke & Smith 2004, p.79, DECCW 2010b). Despite this, visibility is required to adequately assess exposure. As the overall GSV was 20 %, exposure throughout the lot averaged between 20-40 %. Small areas throughout the western side of the lot contained 0-10 % exposure, due to the extensive grass coverage resulting from insufficient clearance (Photo 5). Areas of lesser exposure also occurred where the cut grass had not been removed, with areas of heightened exposure occurring throughout the areas that had been sufficiently cleared, or where present alongside fencing, access tracks or the artificial dam (Photo 6 and Photo 7).



**Photo 5** Exposure throughout stand of trees in the western portion of the lot, facing west





**Photo 6** Typical exposure throughout the lot, with higher areas of exposure visible surrounding the uncleared grass



**Photo 7** Area of higher exposure adjacent to vehicle access tracks, facing north

Disturbance throughout the lot is associated with both natural and human agents. Natural agents generally affect small areas and include the burrowing and scratching in soil by animals, such as wombats, foxes, rabbits and wallabies, and sometimes exposure from slumping or scouring. Disturbances associated with recent human action, however, are prevalent throughout large sections of the land surface. The agents include farming practices, such as initial vegetation clearance for creation of paddocks, fencing and ploughing (Photo 8) and light industrial practices, including the creation of the artificial dam in the northern portion of the lot (Photo 9), in addition to informal access tracks and the remnants of previous buildings and machinery in the eastern and southern portions of the lot (Photo 10).





**Photo 8** Disturbance within the lot, evidence of ploughing of the soils



**Photo 9** Disturbance within the lot, the artificial dam located within the northern portion of the lot facing north



**Photo 10** Disturbance within the lot, remnants of industrial structures and extensive soil churning



## Step 5: Further investigations and impact assessment

Based on the results of the field investigation and background review, it is not likely that the lot was utilised as transitional Aboriginal occupation sites. Previous research indicates that Aboriginal objects and sites are likely to be identified on raised landforms within close proximity to perennial water courses, with previous registered sites within the wider study area for this project occurring within these landscapes. However, Lot X DP 421633 comprises of a flat landform that is not in proximity to any major waterways.

No previously recorded AHIMS sites are located within Lot X DP 421633. Although, there are a number of sites located within close proximity to the study area, test excavations previously conducted by Biosis identified a reduced number of artefacts at distance to South Creek. As Lot X DP 421633 is located within a creek flat landform at distance to South Creek and contains no natural or perennial water courses, the potential for artefacts is reduced. This is because the landscape would not have been an ideal location for Aboriginal people to reside, instead favouring raised areas nearby permanent water sources. The resurvey of the study area also did not identify any previously unrecorded sites.

The Blacktown soil landscape is present within the eastern portion of Lot X DP 421633 with deep soil deposits (less than 100 centimetres) containing potential for archaeological deposits if undisturbed. Although agricultural activities would only disturb approximately 30 centimetres of topsoil, significant disturbance through the development of a residential property and farming infrastructure such as sheds and dams would have caused significant disturbance, further reducing the potential for intact archaeological deposits. The South Creek soil landscape is present within the remaining western and southern portion of Lot X DP 421633. Although soil deposits are deep (up to 190 centimetres) the fluvial nature causes disturbance to archaeological deposits through erosion and depositional processes. Intensive agricultural activities have occurred within this portion of the study area. In addition to this, the construction of a large dam has caused significant disturbance through large scale earthworks, again reducing the potential for archaeological deposits.

Previous assessment conducted by (Biosis 2020b) identified the study area to contain low archaeological potential due to the flat landscape and extensive landscape modification present. The re-survey of the area confirmed these results, identifying that due to the high level of disturbances, the poor preservation rate of archaeological material within underlying soil landscapes, and absence of sites within the study area, there is low potential for archaeological deposits to exist (Figure 8).

Further assessment is not warranted based upon the completion of Steps 1 to 4 of the due diligence code (Figure 9).

The project may proceed with caution, subject to the following recommendations:

- As per the draft CoC, a Cultural Heritage Management Plan (CHMP) covering the entire project area, and inclusive of Lot X DP 421633, should be prepared. Any unexpected cultural heritage finds on Lot X DP 421633 should be managed in accordance with the guidelines set out in the CHMP.
- All Aboriginal objects and Places are protected under the NPW Act. It is an offence to knowingly disturb an Aboriginal site without a consent permit issued by Heritage NSW. Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying the Heritage NSW and Aboriginal stakeholders.



- Aboriginal ancestral remains may be found in a variety of landscapes in NSW, including middens and sandy or soft sedimentary soils. If any suspected human remains are discovered during any activity you must:
  - Immediately cease all work at that location and not further move or disturb the remains.
  - Notify the NSW Police and Heritage NSW's Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
  - Not recommence work at that location unless authorised in writing by Heritage NSW.

Please contact me if you have any enquiries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'ML' or 'Madeleine Lucas'.

Madeleine Lucas  
Research Assistant

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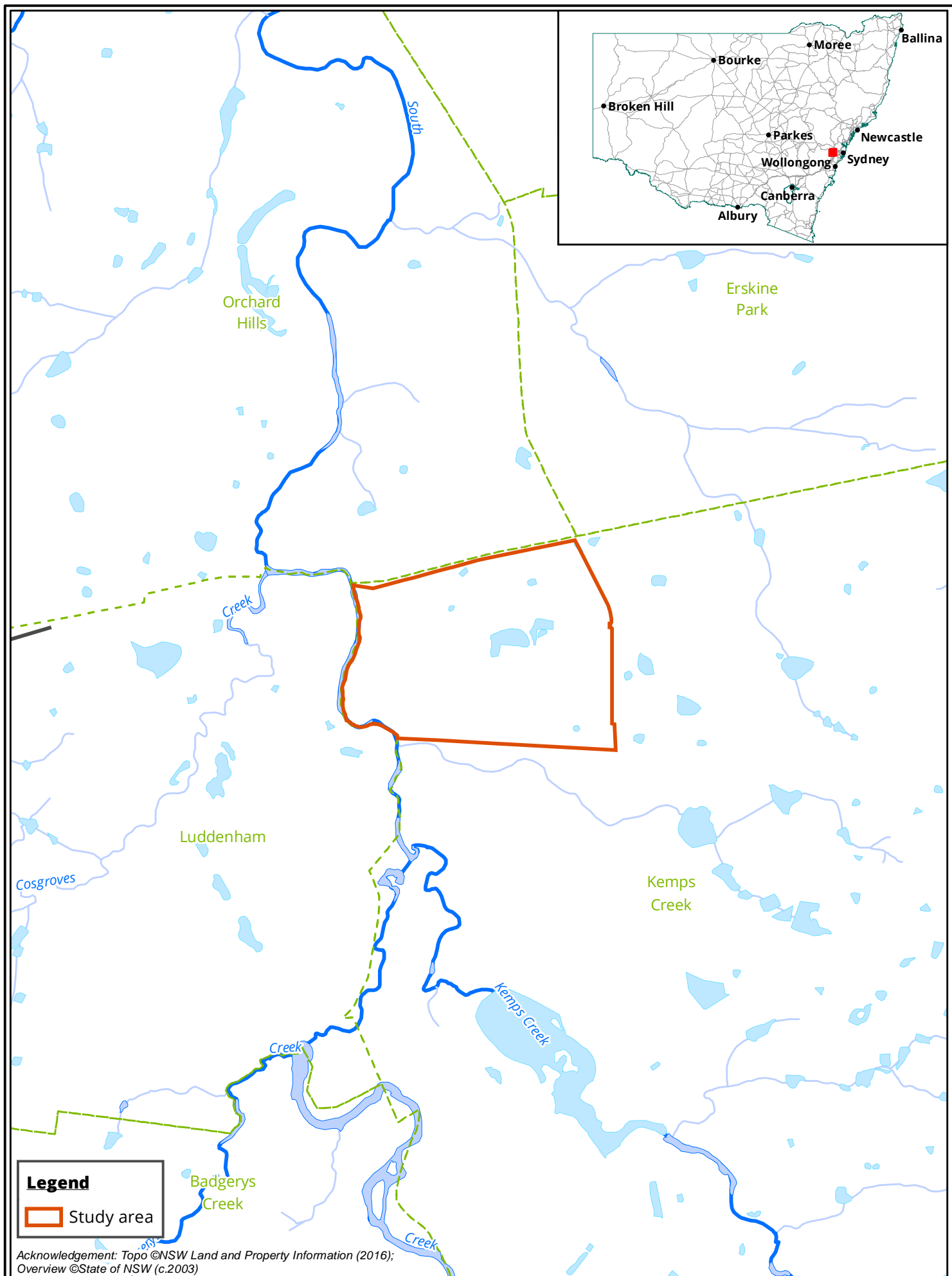
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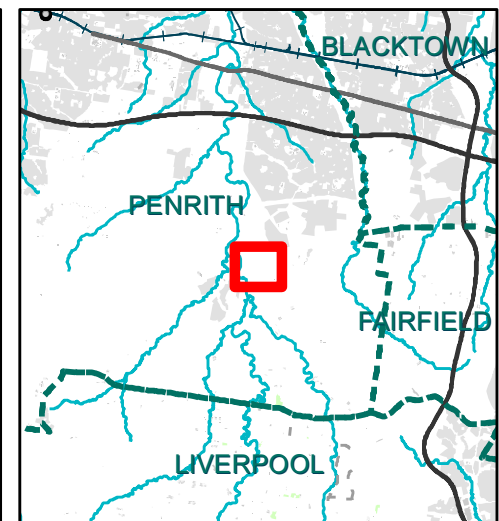
Thorpe, W 1986, *The Penrith Heritage Study, the Historical Archaeology Component*, Report to Fox and Associates on behalf of Penrith City Council.

White, B & McDonald, J 2010, 'Lithic Artefact Distribution in the Rouse Hill Development Area, Cumberland Plain, New South Wales', *Australian Archaeology*, vol. 70, pp. 29-38.









#### Legend

- Study area
- Lot

**Figure 2 Study area detail**

0 50 100 150 200 250  
Metres

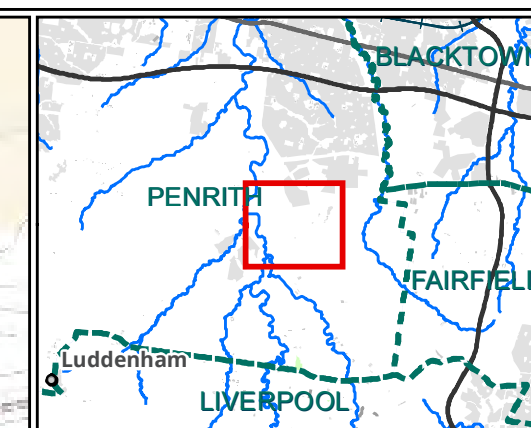
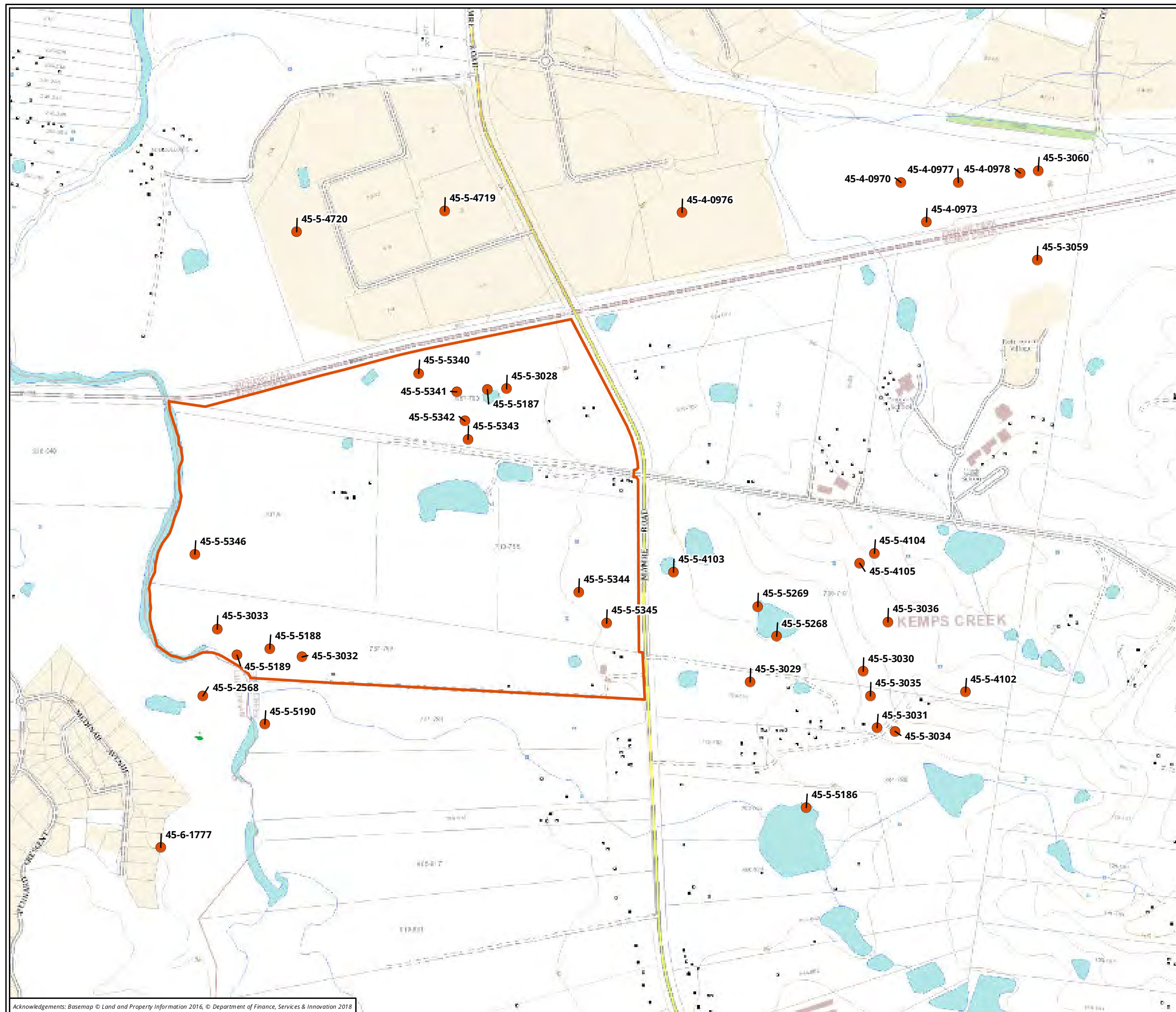
Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



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Matter: 34009  
Date: 16 October 2020  
Checked by: MT, Drawn by: SSK, Last edited by: skumar  
Location: P:\34000s\34009\Mapping\34009\_F2\_StudyArea



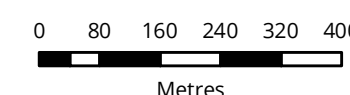


# Legend

- Study area
- AHIMS record

NOT TO BE MADE PUBLIC

Figure 3 AHIMS records near the study area

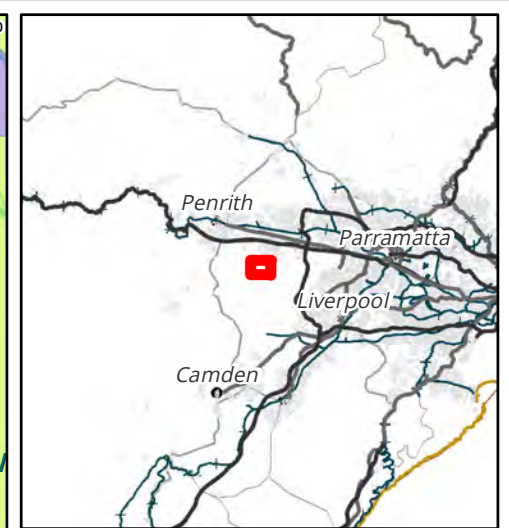
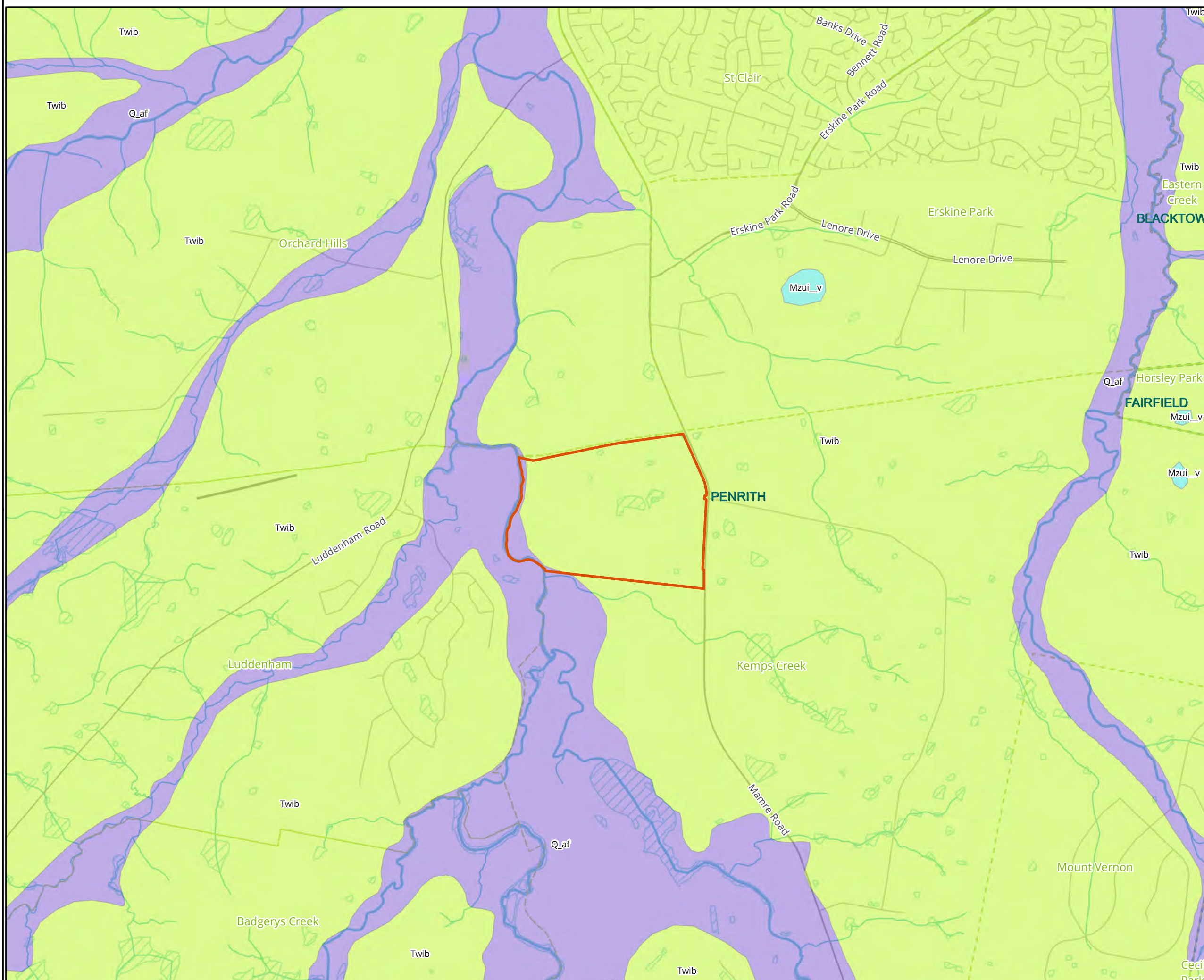


Scale: 1:10,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Matter: [Matter],  
Date: 26 November 2020,  
Checked by: [Cons], Drawn by: [GIS], Last edited by: skumar  
Location: P:\34000s\34009\Mapping\34009\_F3\_AHIMS.mxd






- Legend**
- Study area
  - Geological Units
    - Mzui\_v - Unnamed Mesozoic igneous
    - Q\_af - Alluvial floodplain deposits
    - Twib - Bringelly Shale

Figure 4: Geological units within the vicinity of the study area

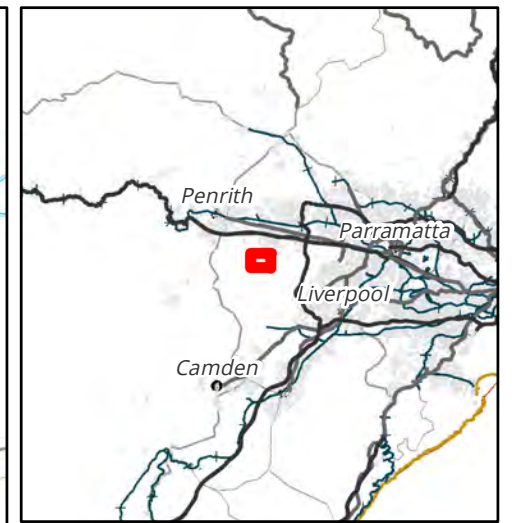
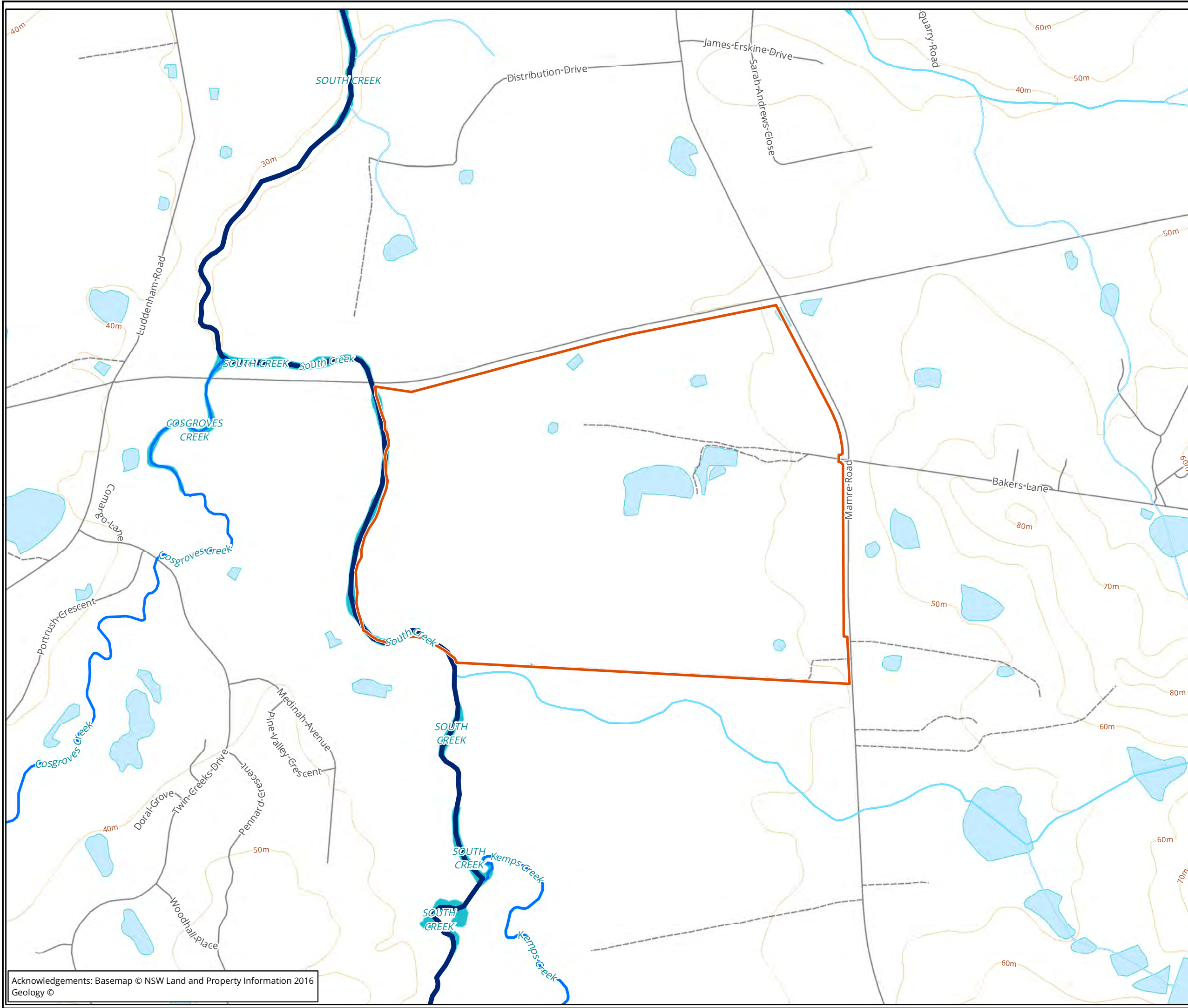
0 250 500 750 1,000 1,250  
Metres  
Scale: 1:25,000 @ A3  
Coordinate System: GDA 1994 NSW Lambert

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Acknowledgements: Basemap © NSW Land and Property Information 2016  
Geology © Colquhoun G.P., Phillips, G., Hughes, K.S., Deyssing L., Fitzherbert, J.A., & Troedson, A.L. 2015. New South Wales Zone 54/56 Seamless Geology, version 1 [Digital Dataset]. Geological Survey of New South Wales, Maitland

Matter: 29083,  
Date: 22 February 2019,  
Checked by: AKE, Drawn by: AEDM, Last edited by: amurray  
Location: P:\29000s\29083\Mapping\29083\_F5\_Geology.mxd





**Legend**

Study area

**Strahler Order**

- 1
- 2
- 4
- 6

Canal-Drain

Natural Watercourse

**Figure 5: Hydrology in the vicinity of the study area**

0 100 200 300 400 500  
Metres

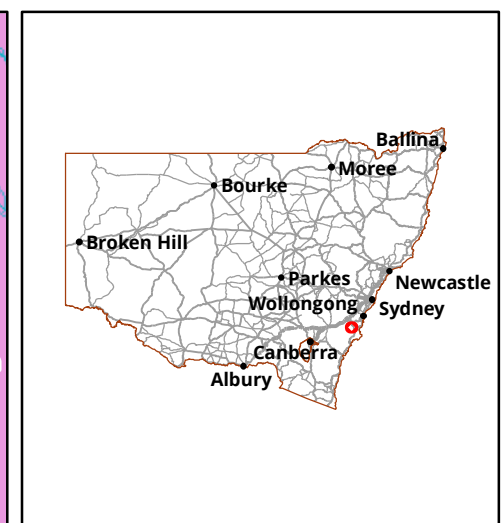
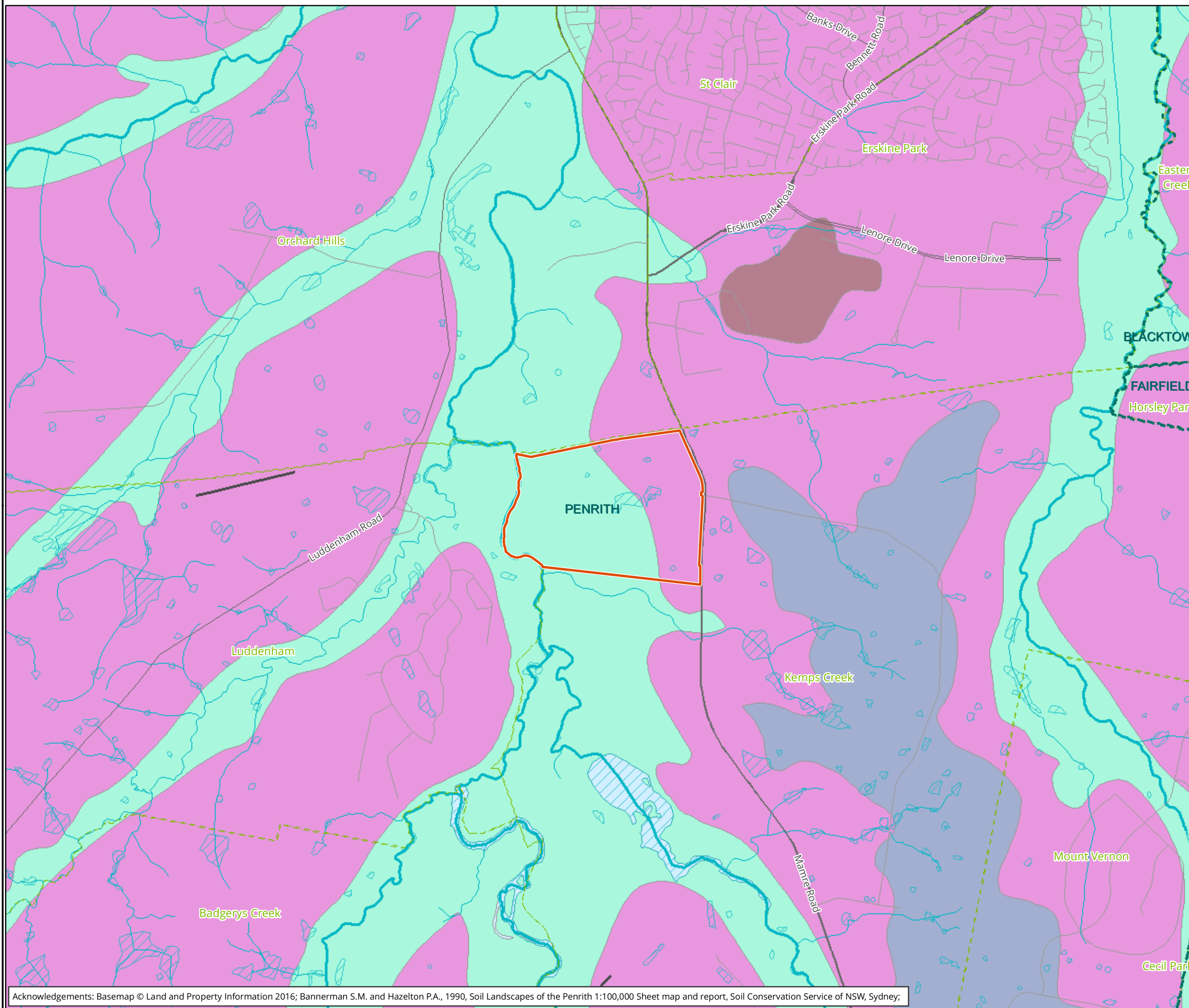
Scale: 1:10,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56

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Matter: 29083,  
Date: 27 February 2019,  
Checked by: AKE, Drawn by: AEDM, Last edited by: amurray  
Location: P:\29000s\29083\Mapping\29083\_F4\_Hydrology.mxd

Acknowledgements: Basemap © NSW Land and Property Information 2016  
Geology ©





### Legend

Study area

### Soil Landscape units

- bt - BLACKTOWN
- lu - LUDDENHAM
- sc - SOUTH CREEK
- WATER - WATER
- xx - DISTURBED TERRAIN

**Figure 6: Soil landscapes in the vicinity of the study**

0 250 500 750 1,000 1,250  
Metres

Scale: 1:25,000 @ A3  
Coordinate System: GDA 1994 NSW Lambert

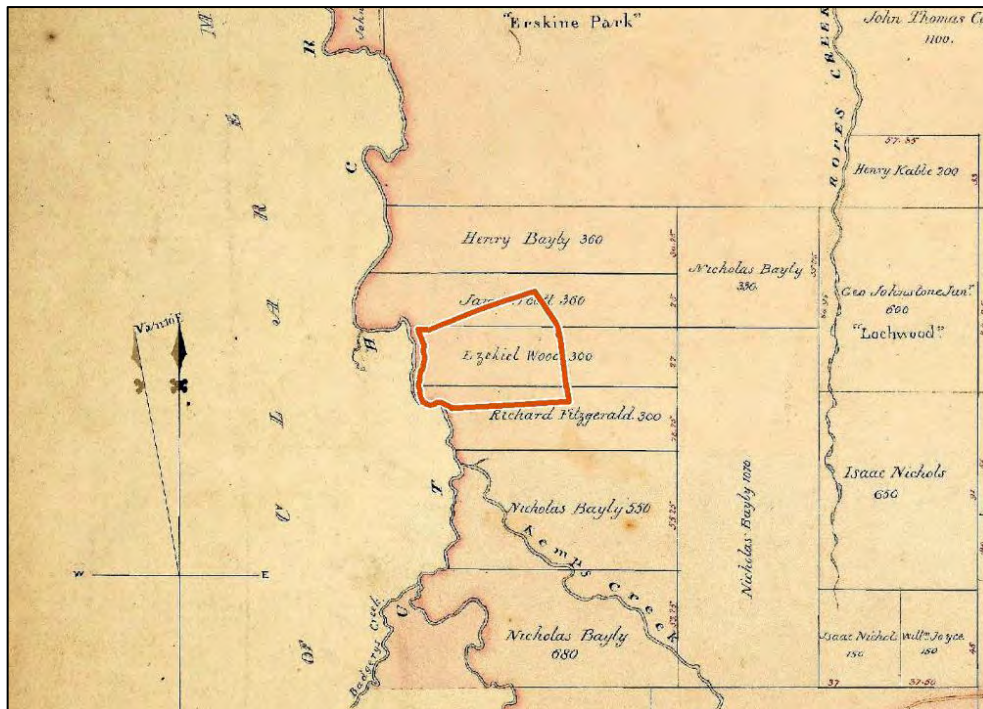


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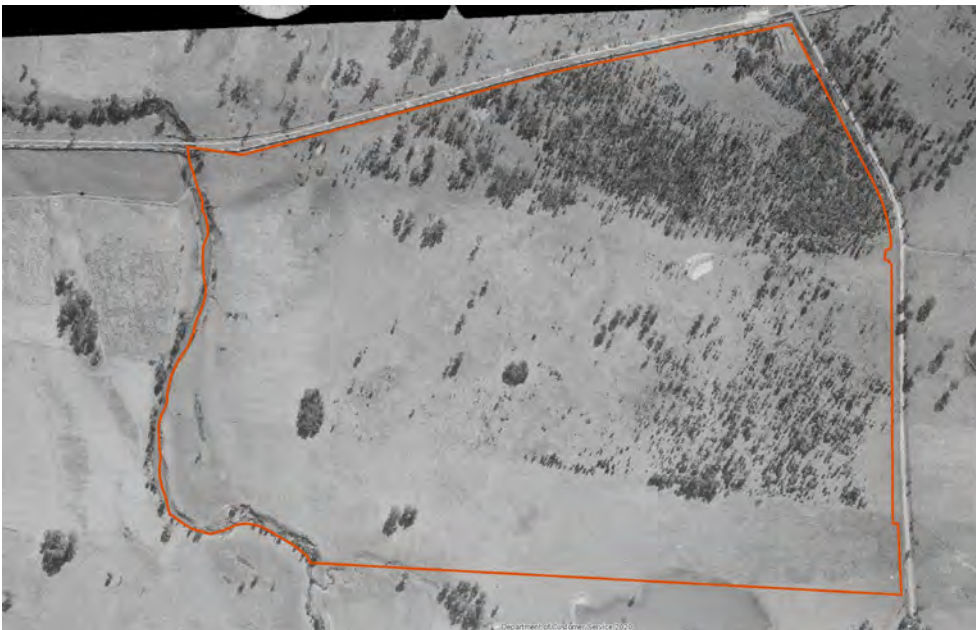
Matter: 27033  
Date: 20 April 2018,  
Checked by: JAC, Drawn by: LW, Last edited by: IWilson  
Location: \\bio-data-01\matters\27000s\27033\Mapping\27033 AR F3 Soils



**Figure 7 Analysis of aerial imagery associated with the study area**

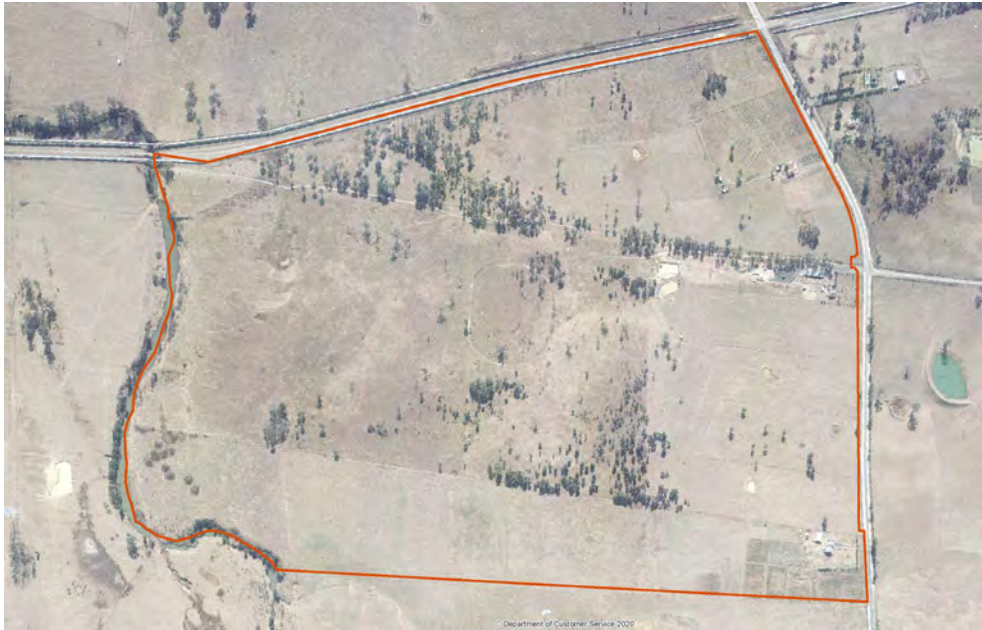


Excerpt from Parish Map of Melville, with the study area outlined in red (NSW LPI 2015)



Aerial photograph dated to 1955 with the study area outlined in red (Source: NSW Spatial Services)





Aerial photograph dated to 1986 with the study area outlined in red (Source: NSW Spatial Services)



Aerial photograph dated to 2005 with the study area outlined in red (Source: NSW Spatial Services)







# Due Diligence Process

1. Will the activity disturb the ground or any modified trees?

Yes

YES

2. Are there any:

A) relevant confirmed site records or other associated landscape feature information on AHIMS? and/or

No Aboriginal sites have been recorded in the study area

B) any other sources of information of which a person is already aware? and/or

No.

C) landscape features that are likely to indicate presence of Aboriginal objects?

No

YES  
to any  
or all

3. Can harm to Aboriginal objects listed on AHIMS or identified by other sources of information and/or can the carrying out of the activity at the relevant landscape features be avoided?

No

NO

4. Does a desktop assessment and visual inspection confirm that there are Aboriginal objects or that they are likely?

No. The study area was assessed as containing low potential for Aboriginal objects.

YES

5. Further investigation and impact assessment required.

NO

NO

YES

NO

AHIP application not necessary. Proceed with caution. If any Aboriginal objects are found, stop work and notify OEH. If Human remains are found, stop work and notify NSW Police and OEH.