

Aussie Skips Recycling Bellfrog St Site Upgrades

Heritage Impact Assessment
for

State Significant
Development Application

October 25



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Acknowledgement of Country

4Pillars acknowledges the Traditional Owners of the land on which this site is located, the people of the Eora and Dharug nations. We pay our respects to their Elders past and present.



Disclosure statement

Mr James Hammond, CEO of 4Pillars is engaged, via an EnviroNow services agreement, to provide environmental consulting services to Aussie Skips Recycling Pty Ltd.

This document has been prepared by 4Pillars and Mr Hammond in their capacity as independent environmental professionals. The statements and conclusions of this document are based on an objective evaluation of the available facts and data.

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1. Introduction

Aussie Skips Recycling Pty Ltd (Aussie Recycling) is proposing to upgrade the existing waste facility located at 13 Bellfrog Street, Greenacre (Lot 15/DP1133214) (the 'site').

The site is currently used for the receipt, storage and export of soils, aggregates, virgin excavated natural material (VENM) and other similar waste materials. The site is currently permitted to receive an annual combined throughput of waste material of 199,000 tonnes (t) in any 12-month period.

Aussie Recycling is proposing to lodge a new State Significant Development (SSD) application (SSD-67497708) seeking approval to construct and operate a materials recovery facility (MRF) on the site. The proposal includes minor demolition, alterations to existing site components, installation of a fixed waste processing plant and site infrastructure, construction of environmental conservation measures, and the ongoing operation of the MRF.

The MRF will have two main buildings, a waste receival building and a processing building. These will be connected by an enclosed conveyor. There will be an open yard between these buildings to allow truck access for delivery of waste and dispatch of recovered products and residual waste.

The MRF will accept and recycle, construction and demolition (C&D) waste, commercial and industrial (C&I) waste and non-putrescible municipal solid waste (MSW), including building and demolition (B&D) wastes such as brick, asphalt, concrete and metals. It is proposed that up to 199,000 t of waste will be accepted and processed in any 12-month period. It is proposed to amend the site's operating hours compared to those currently approved.

MRF operations will include:

- receipt of waste via heavy road vehicles
- storage of waste in the receival building
- handling of waste by the conveyor and mobile plant
- processing of waste, including sifting, picking and screening, using mobile plant and the fixed waste processing plant
- storage of recovered products and residual waste
- dispatch of recovered products and residual waste by heavy road vehicles
- ancillary activities including operation of a workshop, employee parking, overnight truck parking, equipment storage, maintenance, diesel fuel storage in a self-contained fuel tank, water treatment, waste sampling, quality assurance and use of the site's existing facilities.

All waste storage, handling and processing will be within the buildings and conveyor. No waste will be stored, handled or processed outside.

The proposal will allow a broader wider range of wastes to be accepted at the site (C&D, C&I and non-putrescible MSW). It will allow these wastes to be sorted on site to produce recovered products for further recycling, so reducing the amount of waste sent to landfill, as advocated by the NSW Environment Protection Authority's Draft NSW Waste and Circular Infrastructure Plan (EPA 2025). The proposal includes site changes to enhance the site's environmental measures, in particular, construction of a roof over the concrete yard so that all waste will remain under cover. The proposal will not increase existing operational footprint or the site's throughput over a year.

2. Scope of assessment

This AHIA is required as part of the response to the Secretary's Environmental Assessment Requirements (SEARs). As such this assessment addresses the Aboriginal heritage considerations associated with the proposed development. It evaluates the potential effects on both tangible and intangible cultural heritage elements, including sacred sites, cultural landscapes, ancestral connections, and the spiritual significance of the land within and surrounding the Site. The assessment aims to identify, protect, and mitigate any adverse impacts on these heritage values, ensuring that the proposed development respects and aligns with Aboriginal cultural protocols and complies with local, state, and national heritage guidelines.

3. Legislative context and statutory controls

This section of the report provides the relevant legislation and statutory instruments that protect Aboriginal archaeological and cultural within the state of New South Wales.

3.1 SEARs requirements

- An assessment of the potential for Aboriginal objects to be present within the development site, with consideration of its land use history
- Evidence of consultation with Aboriginal parties to inform the assessment of the potential impacts of the project on Aboriginal cultural values and Aboriginal objects. Consultation should be undertaken in compliance with the process outlined in the *Aboriginal cultural heritage consultation requirements for proponents 2010*.

3.2 Commonwealth heritage legislation and lists

3.2.1 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) offers provisions to protect matters of national environmental significance. This Act establishes the National Heritage List and the Commonwealth Heritage List which can include natural, Indigenous and historic places of value to the nation. This Act helps ensure that the natural, Aboriginal and historic heritage values of places under Commonwealth ownership or control are identified, protected and managed.

National Heritage Lists	The National Heritage List is a list which contains places, items and areas of outstanding heritage value to Australia; this can include places, items and areas overseas as well as items of Aboriginal significance and origin. These places are protected under the Australian Government's EPBC Act.	Site not identified on this list. Date accessed 10/10/24
Commonwealth Heritage Lists	The Commonwealth Heritage List can include natural, Indigenous and historic places of value to the nation. Items on this list are under Commonwealth ownership or control and as such are identified, protected and managed by the Federal Government.	Site not identified on this list. Date accessed 10/10/24

3.3 New South Wales State Heritage Legislation and Lists

3.3.1 National Parks and Wildlife Act 1974

The NSW National Parks and Wildlife Act 1974 (NPW Act) (as amended) defines Aboriginal objects and provides protection to any and all material remains which may be evidence of the Aboriginal occupation of lands continued within the state of New South Wales (Sections 84, 86, 87 and 90). The NPW Act also establishes a framework for consultation with Aboriginal communities to ensure that their cultural heritage is respected in land management decisions

An Aboriginal object *means any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.*

Under Part 6 Section 86 of the NPW Act, it is an offence to harm or desecrate an Aboriginal object or places.

3.3.2 Environmental Planning & Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) sets out the framework for managing land use and development while considering environmental impacts, including Aboriginal heritage. Section 4.15 (formerly Section 79C) outlines the matters for consideration when assessing development applications. It requires decision-makers to take into account the environmental impacts of the proposed development, which includes impacts on Aboriginal heritage. The assessment must consider the cultural significance of any affected land or sites.

3.3.3 *Aboriginal Land Rights Act 1983*

The NSW *Aboriginal Land Rights Act 1983* (ALR Act) is designed to recognize and restore land rights to Aboriginal people. It establishes the NSW Aboriginal Land Council (NSWALC) and Local Aboriginal Land Councils (LALCs). The ALR Act requires these bodies to:

- take action to protect the culture and heritage of Aboriginal persons in the council's area, subject to any other law;
- promote awareness in the community of the culture and heritage of Aboriginal persons in the council's area.

These requirements recognise and acknowledge the statutory role and responsibilities of New South Wales Aboriginal Land Council and Local Aboriginal Land Councils.

The ALR Act also establishes the Office of the Registrar whose functions include but are not limited to, maintaining the Register of Aboriginal Land Claims and the Register of Aboriginal Owners. Under the ALR Act the Office of the Registrar is to give priority to the entry in the Register of the names of Aboriginal persons who have a cultural association with:

- lands listed in Schedule 14 to the NPW Act;
- lands to which section 36A of the ALR Act applies.

The Site is not listed under either of these Acts.

3.3.4 *Native Title Act 1993*

The *Native Title Act 1993* (NTA) provides the legislative framework for Indigenous people to claim native title rights, sets out how these rights coexist with other land interests, and establishes processes for determining claims, negotiating agreements, and resolving disputes. It also includes provisions for compensation where native title is extinguished by government action.

The Site is privately owned (freehold title) and under Australian law, freehold title extinguishes any native title that may have existed on the land.

3.4 *Local Planning Instruments*

3.4.1 *Strathfield Local Environmental Plan 2012*

Section 5.10 of the Strathfield Local Environmental Plan 2012 (LEP) outlines sconsidered for Heritage Conservation.

Heritage items (if any) are listed and described in Schedule 5 of the LEP. Heritage conservation areas (if any) are shown on the Heritage Map as well as being described in Schedule 5 LEP. No Heritage items or Heritage conservation areas are identified on or within 200 m of the Site.

3.4.2 *Strathfield DCP 2005 – Part P Heritage*

The *Strathfield Development Control Plan 2005 – Part P Heritage* provides guidelines for conserving and managing heritage within the Strathfield area, ensuring that development respects and enhances its historical character. This part of the DCP applies to heritage items, heritage conservation areas, and properties in proximity to heritage sites, with the following key objectives and requirements. No items relevant to the DCP were identified on Site or in the immediate surrounds of the Site.

3.5 *Referenced documents*

- Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW, 2010)
- Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW, 2010)
- Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (DECCW, 2011)
- Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW, 2010)
- The Burra Charter (ICOMOS Australia, 2013)
- Statements of Heritage Impact (HO and DUAP, 2002)
- Strathfield DCP 2005 – Part P Heritage

4. Methodology

4.1 Desktop assessment

A desktop assessment was undertaken to gather existing information on known or potential Aboriginal heritage sites within the Site. This includes:

- Reviewing existing heritage databases and registers, including the Aboriginal Heritage Information Management System (AHIMS).
- Analysing historical, ethnographic, and archaeological literature relevant to the project location.
- Conducting a preliminary environmental assessment to understand site-specific conditions that may influence the presence of Aboriginal objects and predicting potential for artifacts to be present.

4.2 Due Diligence Assessment and Archaeological Investigation

The assessment then applied the assessment criteria in *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW, 2010) to determine if a Due Diligence assessment was required. It was determined that a Due Diligence Assessment was not required. As such systematic field surveys in accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW, 2010) was not required.

4.3 Aboriginal Cultural Heritage Consultation

Consultation was completed with reference to the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW, 2010). This was to ensure that culturally sensitive and non-physical connections to the land were identified. This process involved:

- Identifying and notifying relevant Aboriginal parties about the proposed project and heritage assessment scope.
- Engaging with stakeholders to gather input on cultural significance and potential heritage impacts.
- Documenting all consultation activities and incorporating community feedback into assessment findings.

4.4 Assessment of Significance, Impact and recommendations

Using the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (DECCW, 2011), the assessment will then evaluate the cultural significance of identified heritage features and the potential impacts of the proposed development. This involves:

- Assessing the historical, social, and scientific values of Aboriginal objects and landscapes.
- Determining impact levels based on proximity, scale, and nature of the proposed activities.
- Providing recommendations for impact avoidance, mitigation, or management on Aboriginal cultural heritage.
- Suggested monitoring procedures or heritage management strategies, as needed, to comply with legislative requirements and protect cultural values.

Note: a formal Cultural Heritage Assessment Report is not being prepared at this stage. Should the outcomes of consultation indicate a need for further assessment this will be completed.

5. Heritage Context

5.1 Heritage mapping

A search of relevant publicly available databases (Table 1) did not identify any items or areas of Aboriginal heritage or non-Aboriginal heritage significance within or in close proximity to the Site.

AHIMS	No Aboriginal Site are recorded in or near the above Site No Aboriginal places have been declared in or near the Site (within 200 m)
State Heritage Inventory	No items identified on Site or within 200 m of the Site

State Heritage Register Curtilage (non-EPI)	No items identified on Site or within 200 m of the Site
National heritage Lists	Site not identified on this list.
Commonwealth Heritage lists	Site not identified on this list.

Table 1: Heritage mapping summary

5.2 Historical use of the Site

The Site and surrounding area were formerly a large open quarry, which was filled with imported soil material. This is stated in the Statement of Environmental Effects (SEE) that accompanied the establishment of the industrial Site (DA No. 2012/175 approved 19/2/13 referred to at the 2013 SEE). This is further seen in historical imagery of the Site. The 2013 SEE contains imagery of the former state of the Site and surrounding allotments (Figure 7). Historical aerial imagery further confirms the presence and extent of the quarry (Figure 2, Figure 3, Figure 4, Figure 5 and Figure 6). Quarrying operations began prior to 1943, with quarrying occurring directly under the Site's footprint between 1971 and 1991. Quarrying activities stopped at the Site between 1991 and 1998 and the Site was filled between 1998 and 2005 (range is given for times as historical imagery is not yearly). The Site sat vacant until establishment as an industrial premise in 2014.

Due to the presence of the quarry and importation of material to fill the void, there is no natural material located on Site. It is almost impossible for Aboriginal artifacts or built heritage items to be present on the surface or subsurface of the Site.

5.3 Current and future Site use

Current Site and area use is industrial facilities, future use is not anticipated to change.

5.4 European and built heritage context

Specific information on the historical use of the Site (prior to 1940) is difficult to obtain from public records. A review of the general area determined the area surrounding the Site was mostly part of the large logistical and industrial area surrounding Enfield Marshalling Yards, with a small residential area. This area was incorporated into Enfield Council in 1889 and transferred to Strathfield Council in 1949 along with the western ward of Enfield Council (most of which is now Strathfield South).

5.5 Indigenous heritage context

The Aboriginal groups of the entire Sydney region were part of the Australian south-east coast cultural group. It is believed that the Darug (specifically the Wangal Clan) and Eora people were the original inhabitants of the area surrounding the Site, for many thousands of years before European settlement. The Darug is the largest Aboriginal language group in the LGA.

These societies lived in a close symbiotic relationship with their environment. The land provided kangaroo, emu, possum, wild honey, plants and roots. Botany Bay, the Cooks River and Georges River provided fish and shellfish. Signs of occupation are found in rock shelters, which were used as cooking and camping places, and middens, made up of shells discarded from shellfish meals over hundreds of years.

5.6 Site features

Cox's Creek is located along the eastern boundary of the Site. This has been significantly altered from its natural condition due to quarrying activities and establishment of the creek with a concrete channel.

The Site contains no native vegetation. There is an exotic grassy swale in the eastern portion of the Site (this vegetation will be retained).

6. Key aspects of the proposed development

The proposed development is as follows.

Aspect	Description
Construction activities	• Alterations to existing infrastructure to establish the Processing Building; and • Alterations to the Receival Building; • Installation of the MRF plant and concrete material bays (i.e. utilising precast panels below the plant). • Installation of bays, a hopper and enclosed conveyor in the Receival Building. • Installation of engineering mitigation measures (as defined within this report). All plant components are 'bolt on' to the existing (approximately 300 mm) concrete hardstand. No piers, piles or below ground structural support is needed for the plant or other infrastructure. Other activities such as the construction of mitigation measures, tanked storage etc. will be completed during this stage.
Operational activities	Resource Recovery of Construction and Demolition (C&D) waste which includes: • Receipt of waste material via heavy road vehicles; • Handling of waste material by mobile plant; • Processing of waste material by sifting, picking, and mechanised screening (fixed MRF fixed equipment plant); • Storage of waste materials and processed recovered products; • Export of waste materials by heavy road vehicles; and • Various ancillary activities such as: operation of a workshop, overnight truck parking, general storage of equipment, maintenance, material sampling and quality assurance etc. Expected EPA Scheduled activities: • Waste storage • Resource Recovery • The characterisation of these activities for planning purposes and alignment to Scheduled Activities as defined in the <i>Protection of the Environment Operations Act 1997</i> is detailed later in this EIS.

6.1 Archaeological predictions

It is important to note that the following describes the archaeological potential of the Site. It is acknowledged that if the Site has little or no archaeological potential, the Site may still have cultural significance to the Aboriginal community. This is further investigated through consultation.

Where present, Aboriginal sites will generally be located in proximity to major water resources (generally within 200 metres). Although the Site is located within 200 m of the water course, the Sites long history of clearing, quarrying and backfilling would have destroyed any potential Indigenous artifact. The Australian Soil and Land Survey Field Handbook (CSIRO 2010) considers this to be "major disturbance".

Major disturbance to sections of the landscape: Sub-surface Aboriginal objects with potential conservation value have a negligible probability of being present within the Site.

Review of information and aerial imagery indicates that past European land use has led to the clearing of the land and extensive excavations through quarrying operations in the broader areas. Residential and industrial/commercial development, roads and urban infrastructure have likely impacted the integrity of potential Aboriginal sites within the area as well.

As such we have determined there to be a negligible probably of Aboriginal objects present within the Site.

6.2 Potential harm causing activities

We note that due to past quarrying operations there is a negligible probability of Aboriginal objects being present on the Site. To take a conservative approach, we have reviewed the activities to occur as part of this development under the assumption that there could be potential objects present. If no impact to potentially present objects was determined, it could be concluded that no further assessment of impact on Aboriginal objects would be required.

Construction

- No changes to the hardstand, footings, piers or earthworks are proposed.
- Plant equipment to be installed on the existing hardstand.

No potential harm to Aboriginal objects

Operation

- No changes to the hardstand or operational footprint.

No potential harm to Aboriginal objects

As construction or operations activities will not extend into the subsurface, there is no pathway for the proposed works to contact subsoils and subsequently impact potential Aboriginal items.

6.3 Archaeological potential determination

No Aboriginal objects and/or features of cultural and archaeological significance were identified during the desktop review. A review of previous land disturbance indicates a long history of quarrying operations. The proposed development is also minor in nature, consisting of no expansion in footprint or earthwork activities. In review of the level of disturbance and proposed activities, there is a **nil possibility of there being Aboriginal objects present on Site or the proposed development causing harm. As such it is believed works may proceed with caution.**

7. Due diligence

As outlined with the conclusions above, the flow chart within the “*Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*” was followed. It was determined that a Due Diligence Assessment was not necessary and a Aboriginal Cultural Heritage Assessment (ACHA) is not necessary, the works can proceed with caution (Figure 1).

1 Do you need to use this due diligence code?

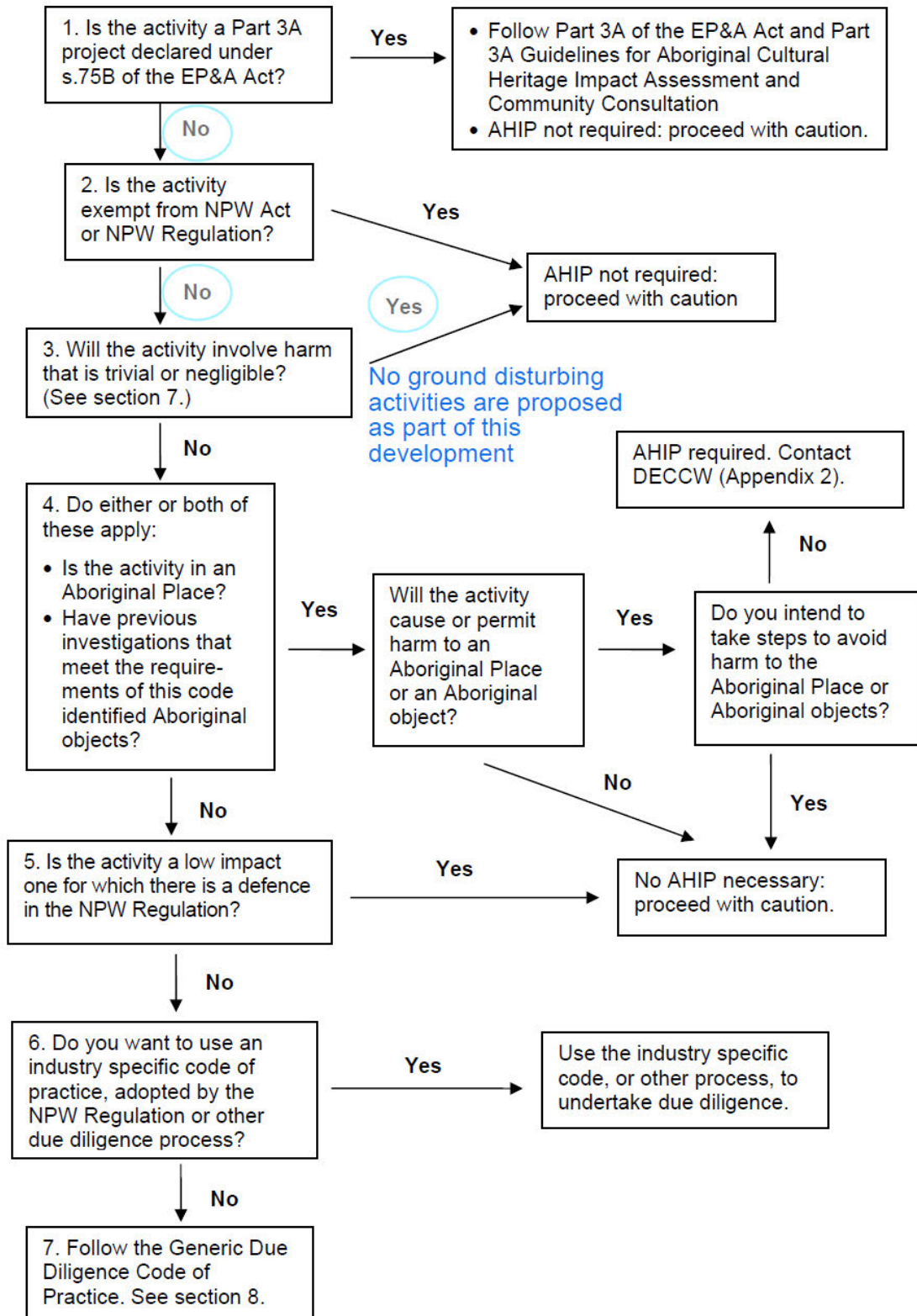


Figure 1: Due Diligence process flow chart. Obtained from the “Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales”.

7.1 Field Survey and Archaeological Investigation

In accordance with the above findings, there is thought to be trivial / negligible probability of Aboriginal objects occurring on the Site. Hence, test excavation or preparation of a ACHA is not considered necessary.

7.2 Aboriginal Cultural Heritage Consultation

Although the Site has been majorly disturbed through quarry operations and there is negligible probability of Aboriginal objects occurring on Site, 4Pillars recognise the Site may still have cultural significance to the Aboriginal community. As such, has conducted consultation with reference to *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010). The objective is to determine if any parties have interest in the Site that requires further assessment.

Step	Consultation period	Consultation completed summary	Outcomes
1	07/03/24 – 29/03/24	Identification of Aboriginal Organisations and people who may have interest in the Proposed Site upgrades. Letter sent to: - Metropolitan Local Aboriginal Land Council - Local Land Services Council (Greater Sydney Local Offices) - National Native Title Tribunal - Strathfield Council - NSW Native Title Services (NTSCORP) - Office of the Registrar Aboriginal Land Rights Act 1983 - DECCEW (Environment and Heritage group)	Letter provided in A1
2	NA	Compilation of all Compilation of Aboriginal people who may have an interest in the Site.	List as provided in A2
3	26/03/24 – 12/04/24	Notification of the proposed development sent via email or mail to all compiled Aboriginal people who may have an interest. Recording of interested parties.	Letter provided in A3
4	08/04/24 – 17/04/24	Notification of the proposed development placed in the local Newspaper. Recording of interested parties.	Newspaper A4
5	NA	Compilation of RAPs	RAPs recorded A5
6	30/05/24 – 02/07/24 Reminder email sent 25/06/24	Presentation of information about the proposed project. Gathering information about the cultural significance. - Seeking information from RAPs to identify objects or cultural value. - Seeking input on potential management / mitigation options.	Letter A6 and website A7 Survey A8 Survey results A9
7	02/07/24- 31/12/2024	- Ongoing communication with RAPS (no additional feedback received in this time. 05/12/24 - Site inspection with RAP(s) who were interested in seeing the Site.	7
8	28/2/2025	Consultation closed out. No further comments received.	8

Table 2: Heritage consultation summary.

7.3 Outcomes of consultation

- 69 organisations / individuals were contacted as part of the consultation.
- 15 organisations / individuals registered their interest in the Site.
- Four provided responses to survey questions or comments on the proposed development and approach.
- Three parties supported the methodology outlined in the information provided. One party responded “unsure”.
 - The party who responded “unsure” was offered to visits the Site to gain further insight. Mr James Hammond escorted the party around the Site on 05/12/23 and provided an onsite overview of the proposed development. No concerns or objections to the proposed development were raised.

8. Assessment of Significance

The processes of assessing significance for items of cultural heritage value are set out in *The Australian ICOMOS Charter for the Conservation of Places of Cultural Significance: the Burra Charter* (1999 amended 2013) (the Burra Charter).

Under the Burra Charter model, the cultural significance of a heritage site or place is assessed in terms of its “aesthetic, historic, scientific and social values”, none of which are mutually exclusive. Establishing cultural significance under the Burra Charter model involves assessing all information relevant to an understanding of the site and its fabric. The assessment of cultural significance and the preparation of a statement of cultural significance are critical prerequisites to making decisions about the management of any heritage site or place (ICOMOS, 1999).

8.1 Educational Significance

The educational value of any given location will depend on the importance of any archaeological material located, on its rarity, quality and the contribution this material can have on any educational process (Burra Charter).

No archaeological and/or Aboriginal cultural material is thought to be located due to the history of quarrying and back filling. Therefore, no educational significance can be assigned to the Site.

8.2 Scientific Significance

The scientific value of any given location will depend on the importance of the data that can be obtained from any archaeological material located, on its rarity, quality and on the degree to which this may contribute further substantial information to a scientific research process. (Burra Charter).

No archaeological and/or Aboriginal cultural material is thought to be located due to the history of quarrying and back filling. Therefore, no scientific significance can be assigned to the study area.

No specific scientific significance has been assigned by registered Aboriginal parties.

8.3 Historic Significance

A place may hold historical significance due to its influence on, or influence by, notable figures, events, phases, or activities. Historical value can also stem from being the location of a significant event. The importance of a site increases when tangible evidence of its association or event remains intact on-site, or when the surrounding setting has been largely preserved. However, certain associations or events may be of such importance that the site retains its significance regardless of later modifications. (Australia ICOMOS)

No specific historic significance has been assigned by registered Aboriginal parties.

8.4 Aesthetic Significance

Aesthetic value encompasses elements of sensory perception that can and should be clearly defined. These criteria may consider the form, scale, colour, texture, and materials of the structure, as well as the scents and sounds associated with the place and its function.

No specific Aesthetic significance has been assigned by registered Aboriginal parties.

8.5 Social Significance

Social or cultural value refers to the spiritual, traditional, historic and contemporary associations and attachments a place or area has for Aboriginal people and can only be identified through consultation with Aboriginal people. To date, information received from RAPs involved in this assessment have identified the following social or cultural values for the Site:

- The site and the area would have been used for hunting and walking
- Both culturally and historically, the Site and the surrounding study area have historical significance due to their association not only with the Aboriginal peoples of the past but also with the Aboriginal communities currently connected to these lands.

9. Assessment of potential impacts

9.1 *Archaeological*

As outlined above – due to the quarry history of the Site there is nil possibility of there being Aboriginal objects present on Site or the proposed development causing harm. As such it is believed works may proceed with caution.

9.2 *Cultural*

No specific cultural connection to the Site was identified by the RAPs. Of the respondents, 3 of the 4 RAPs supported the proposed development and the methods completed. The fourth respondent responded with a maybe, however after the Site visit and further discussion with 4Pillars they confirmed that they had no concerns or objection to the proposed development. They also confirmed they did not have a desire to receive information about the project in the future.

10. Management and mitigation

No specific management or mitigation is recommended or required, based on the outcomes of this assessment.

11. Conclusion

The Aboriginal Heritage Impact Assessment has determined that the proposed development will have no adverse impact on Aboriginal heritage values. Comprehensive investigations, including a review of heritage registers and consultation with relevant stakeholders, found no evidence of Aboriginal heritage sites or culturally significant areas within or adjacent to the development area.

The absence of identified heritage features, combined with the project's location and scope, confirms that the development will not affect the cultural heritage or the broader community's connection to the land. No further heritage management or mitigation measures are required, and the project is considered compliant with all relevant legislative and cultural heritage guidelines.

12. Appendices

- Appendix 1. Notification letter to Aboriginal Organisations.
- Appendix 2. Organisations who may have interest summary.
- Appendix 3. Notification letter.
- Appendix 4. Newspaper notification.
- Appendix 5. Registered Aboriginal Parties summary.
- Appendix 6. RAPs consultation.
- Appendix 7. Website.
- Appendix 8. Blank survey.
- Appendix 9. Survey results.

13. Figures and photos



Figure 2: Historical aerial imagery 1975, showing Site use as a quarry.



Figure 3: Historical aerial imagery 1986, showing Site use as a quarry.

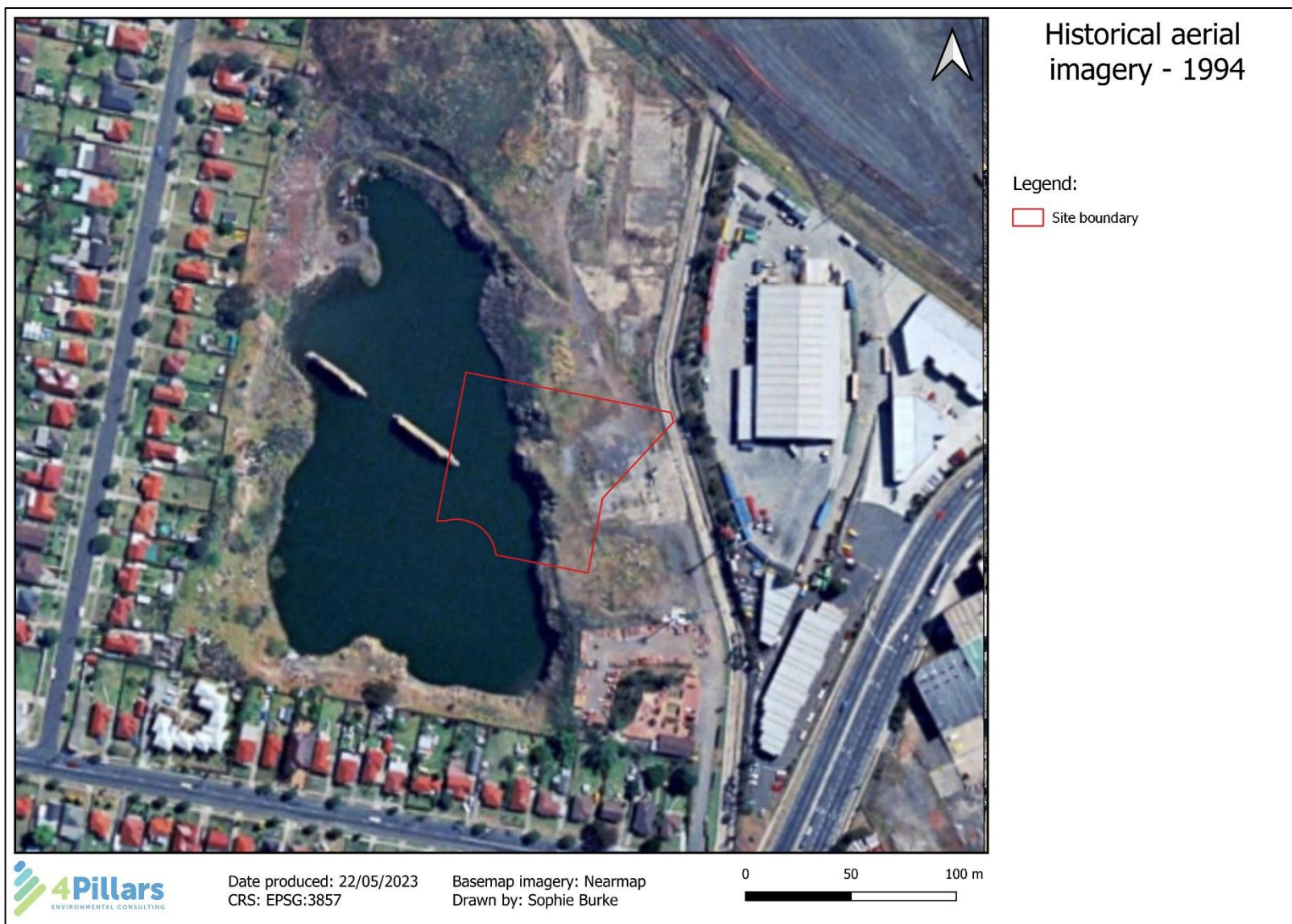


Figure 4: Historical aerial imagery 1994, showing completion of quarrying activities.



Figure 5: Historical aerial imagery 2004, showing the quarry void being filled with soil materials.

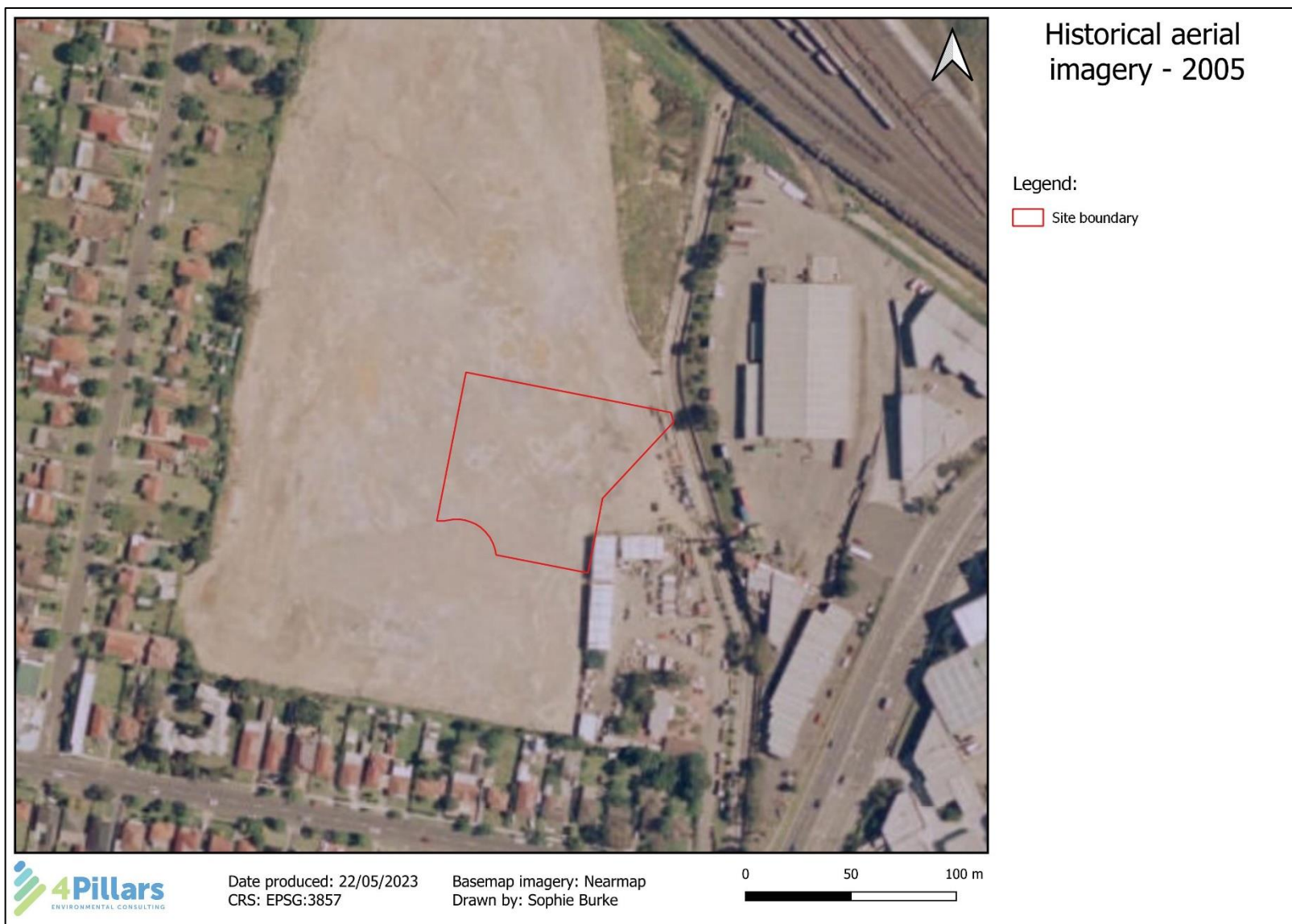


Figure 6: Historical aerial imagery 2005, showing completion of void filling activities.



Figure 7: Image of the Site prior to establishment of industrial area (use as a quarry). Source: SEE 2013, unknown date.

7 March 2024

Our reference:20240307_AUS_ACH_S1.1

RE: Identification of Aboriginal organisations and people who may have an interest in the proposed site upgrades to the existing resource recovery facility located at 13 Bellfrog Street, Greenacre 2190 NSW.

Dear Sir or Madam,

4Pillars Environmental Consulting Pty Ltd (4Pillars) have been engaged by Aussie Skips Recycling Pty Ltd (Aussie Recycling) to complete an Aboriginal Cultural Heritage assessment for the proposed upgrades to their existing waste facility at 13 Bellfrog Street, Greenacre 2190 NSW (LOT 15 DP1133214) (the Site).

The assessment will form part of the Environmental Impact Statement (EIS) being prepared to support a State Significant Development approval for Development Consent under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A) for the project. This will include installation of processing equipment and changes to waste types and through put. There is to be no changes to the existing hardstand present across the Site and there will be no earthworks or excavation as part of the proposed upgrades. Further information on the project can be obtained by visiting <https://www.4pillars.com.au/aussie-recycling-greenacre/>.

In accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010), we are seeking to identify Aboriginal organisations and people who may have an interest in the Site and hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places for that area.

4Pillars invites you to register your interest in being involved in the assessment process. Should you wish to register your interest please email or post your contact details to the below by 29 March 2024. We would also like to take this opportunity to request from you any initial comments regarding the cultural values of the project area.

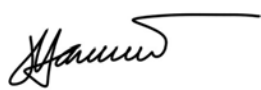
Please note that in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010), 4Pillars is required to provide a record of all registered Aboriginal parties to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) and to the Local Aboriginal Land Council. Should you not wish your details to be released to either of the previously mention groups, please notify us of this as part of your registration and interest in the project.

If you would like to discuss this matter further, please contact us via the details provided below.

Kind regards,

James Hammond

Director | Certified Environmental Practitioner

A handwritten signature in black ink, appearing to read "James Hammond".

4Pillars Environmental Consulting

p: 02 8313 7054

e: hello@4Pillars.com.au

a: Level 1, 5 George Street, North Strathfield 2137

PO Box 3160 North Strathfield NSW 2137

Identified Aboriginal organisations / individuals	
Metropolitan Local Aboriginal Land Council	Munyunga (Murrin Clan/Peoples)
Local Land Services Council (Greater Sydney Local Offices)	Mura Indigenous Corporation (icn:8991)
Strathfield Council	Murramarang (Murrin Clan/Peoples)
Canterbury-Bankstown Council	Murrumbul (Murrin Clan/Peoples)
NSW Native Title Services (NTSCORP)	Ngambaa Cultural Connections
Department of Climate Change, Energy, the Environment and Water (Environment and Heritage group)	Nundagurri (Murrin Clan/Peoples)
Office of the Registrar Aboriginal Land Rights Act 1983	Pemulwuy (Murrin Clan/Peoples)
National Native Title Tribunal	Thauaira
A1 Indigenous Services	Thomas Dahlstrom Offers ACH value by using 3D Laser and Drone technology
Amanda Hickey Cultural Services	Thoorga Nura
Aragung Aboriginal Cultural Heritage Site Assessments	Scott Franks on the behalf od the Wonnarua PBC
B.H. Heritage Consultants	Yarrawalk Pty Ltd
Badu (Murrin Clan/Peoples)	Waawaar Awaa Aboriginal Corporation
Barking Owl Aboriginal Corporation	Wailwan Aboriginal Group
Barraby Cultural Services	Walbunja (Murrin Clan/Peoples)
Biamanga (Murrin Clan/Peoples)	Walgalu (Murrin Clan/Peoples)
Bidjawong Aboriginal Corporation	Wingikara (Murrin Clan/Peoples)
Bilinga (Murrin Clan/Peoples)	Wori Woolywa
Butucarbin Aboriginal Corporation	Wullung (Murrin Clan/Peoples)
Clive Freeman	Wurrumay Pty Ltd
Cullendulla (Murrin Clan/Peoples)	Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation
Darug Custodian Aboriginal Corporation	Yurrandaali
Darug Land Observations	Wallanbah Aboriginal Site Conveyancing
Dharug (Murrin Clan/Peoples)	RAW Cultural Healing
Dharug Ngurra Aboriginal Corporation	Dharramalin
Didge Ngunawal Clan	Ninnum
Eric Keidge	Long Gully Cultural Services
Gilay Consultants	Gadu chts
Ginninderra Aboriginal Corporation	Pearl Depoma
Goobah Development PTY LTD (Murrin Clan/Peoples)	Nattai Aboriginal Culture & Heritage Consultation Service
Goodradigbee Cultural & Heritage Aboriginal Corporation	
Gulaga	
Gunjeewong Cultural Heritage Aboriginal Corporation	
Guntawang Aboriginal Resources Incorporated	
Gunyuu (Murrin Clan/Peoples)	
Jerringong (Murrin Clan/Peoples)	
Kamilaroi Yankuntjatjara Working Group	
Koori Digs Services	
Minnamunnung	

Name: «Name»

Address: «Address»

Sent via email to: «Email»

RE: Identification of Aboriginal organisations and people who may have an interest in the proposed site upgrades to the existing resource recovery facility located at 13 Bellfrog Street, Greenacre 2190 NSW.

Dear Sir or Madam,

4Pillars Environmental Consulting Pty Ltd (4Pillars) have been engaged by Aussie Skips Recycling Pty Ltd (Aussie Recycling) to complete an Aboriginal Cultural Heritage assessment for the proposed upgrades to their existing waste facility at 13 Bellfrog Street, Greenacre 2190 NSW (LOT 15 DP1133214) (the Site).

The assessment will form part of the Environmental Impact Statement (EIS) being prepared to support a State Significant Development approval for Development Consent under Part 4, Division 4.7 of the *Environmental Planning and Assessment Act 1979* (EP&A) for the project. This will include installation of processing equipment and changes to waste types and through put. There is to be no changes to the existing hardstand present across the Site and there will be no earthworks or excavation as part of the proposed upgrades. Further information on the project can be obtained by visiting <https://www.4pillars.com.au/aussie-recycling-greenacre/>.

In accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010), we are seeking to identify Aboriginal organisations and people who may have an interest in the Site and hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places for that area.

4Pillars invites you to register your interest in being involved in the assessment process. Should you wish to register your interest please email or post your contact details to the below by 12 April 2024. We would also like to take this opportunity to request from you any initial comments regarding the cultural values of the project area.

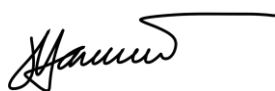
Please note that in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010), 4Pillars is required to provide a record of all registered Aboriginal parties to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) and to the Local Aboriginal Land Council. Should you not wish your details to be released to either of the previously mention groups, please notify us of this as part of your registration and interest in the project.

If you would like to discuss this matter further, please contact us via the details provided below.

Kind regards,

James Hammond

Director | Certified Environmental Practitioner

A handwritten signature in black ink, appearing to read "James Hammond".

4Pillars Environmental Consulting

p: 02 8313 7054

e: hello@4Pillars.com.au

a: Level 1, 5 George Street, North Strathfield 2137

PO Box 3160 North Strathfield NSW 2137



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TO ALL RESIDENTS

Please be advised the event 'Sydney Royal Easter Show' will be held at Sydney Showground, Sydney Olympic Park from Friday 22 March until Tuesday 2 April 2024. The event will start at 8:30am and cease at 11pm daily. Intermittent amplified sound may be heard through this time. Pyrotechnics & laser may also feature as part of the daily entertainment. Some intermittent amplified sound and pyrotechnics will occur on Wednesday March 21 in the evening during the event preview.

For sound level enquiries please contact **02 9714 7310**

Tenders

School Canteen Licence Banksia Road PS

Tenders are called for the licence of the School canteen for the school year commencing 22nd April and for a term of approximately 5 years. Annual school enrolments will be approximately 554 students. General enquiries and requests for a Tender Information Package should be referred to:

Mrs Celine Thurlow.
Telephone: (02) 9707 3424

Tenders must be submitted in a sealed envelope marked "Confidential – School Canteen Tender" and sent to:

The Principal
Banksia Road Primary School
65 Banksia Road, Greenacre 2190

Tenders close at 3pm on Friday 5th April.

A tender visit and briefing session is planned to be held in the near future. All applicants must make themselves familiar with clause 2 of the tender offer.

NEED RESULTS?

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Public Notices

Aboriginal Stakeholder Consultation Expression of interest AUSSIE SKIPS RECYCLING Bellfrog Street Site upgrades

4Pillars Environmental Consulting Pty Ltd (on behalf of Aussies Skips Recycling Pty Ltd) is seeking to identify Aboriginal persons or organisations who wish to be consulted in relation to the proposed upgrades to their existing resource recovery facility at 13 Bellfrog Street, Greenacre 2190 NSW. An Aboriginal Cultural Heritage assessment will be undertaken for the upgrades.

This assessment will form part of an Environmental Impact Statement (EIS) being prepared to support a State Significant Development approval under Part 4, Division 4.7 of the Environmental Planning and Assessment Act 1979 (EP&A 1979) for the project.

Further information on the project can be obtained by visiting <https://www.4pillars.com.au/aussie-recycling-greenacre/>.

Interested Aboriginal persons and/or organisations are invited to register their interest via email or in writing:

James Hammond
4Pillars Environmental Consulting Pty Ltd
PO Box 3160 North Strathfield NSW 2137
Ph: 02 8313 7054 hello@4Pillars.com.au
Lvl 1, 5 George Street, North Strathfield 2137

Expressions of interest should include current contact details. The closing date for registration is 17 April 2024.

Extra Extra

FAMILY NOTICES

In Memoriam

BONE, George Johnstone.
Passed away 28.3.65.
Always remembered by Margaret and family.

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[illegible]



Subject:

Date:

Further consultation - Site upgrades to Aussie Skips Recycling at 13 Bellfrog Street, Greenacre
Thursday, 30 May 2024 3:38:00 PM

Dear 

Thank you for registering your interest in the the proposed upgrades to the Aussies Skips Recycling facility at 13 Bellfrog Street, Greenacre 2190 NSW.

Please find attached a link to a webpage that contains further information on the proposed project. Located at the end of the webpage is a link to survey. The survey is to further understand the importance of 13 Bellfrog Street for those who have registered their interest. This survey will take about 10 minutes to complete, we would greatly appreciate you filling out all questions, however only a few questions are required.

<https://aussiesskipsrecycling-heritage.my.canva.site/>

We look forward to hearing your responses and please do not hesitate to reach out to us if you have any questions or concerns.

AUSSIE SKIPS RECYCLING

SITE UPGRADES

Heritage Consultation



ACKNOWLEDGEMENT OF COUNTRY

Aussie Skips Recycling and 4Pillars Environmental Consulting acknowledging the Tradition Owners of the land on which the Site is located, the People of the Eora and Dharug nations. We pay our respect to their Elders past, present and emerging.

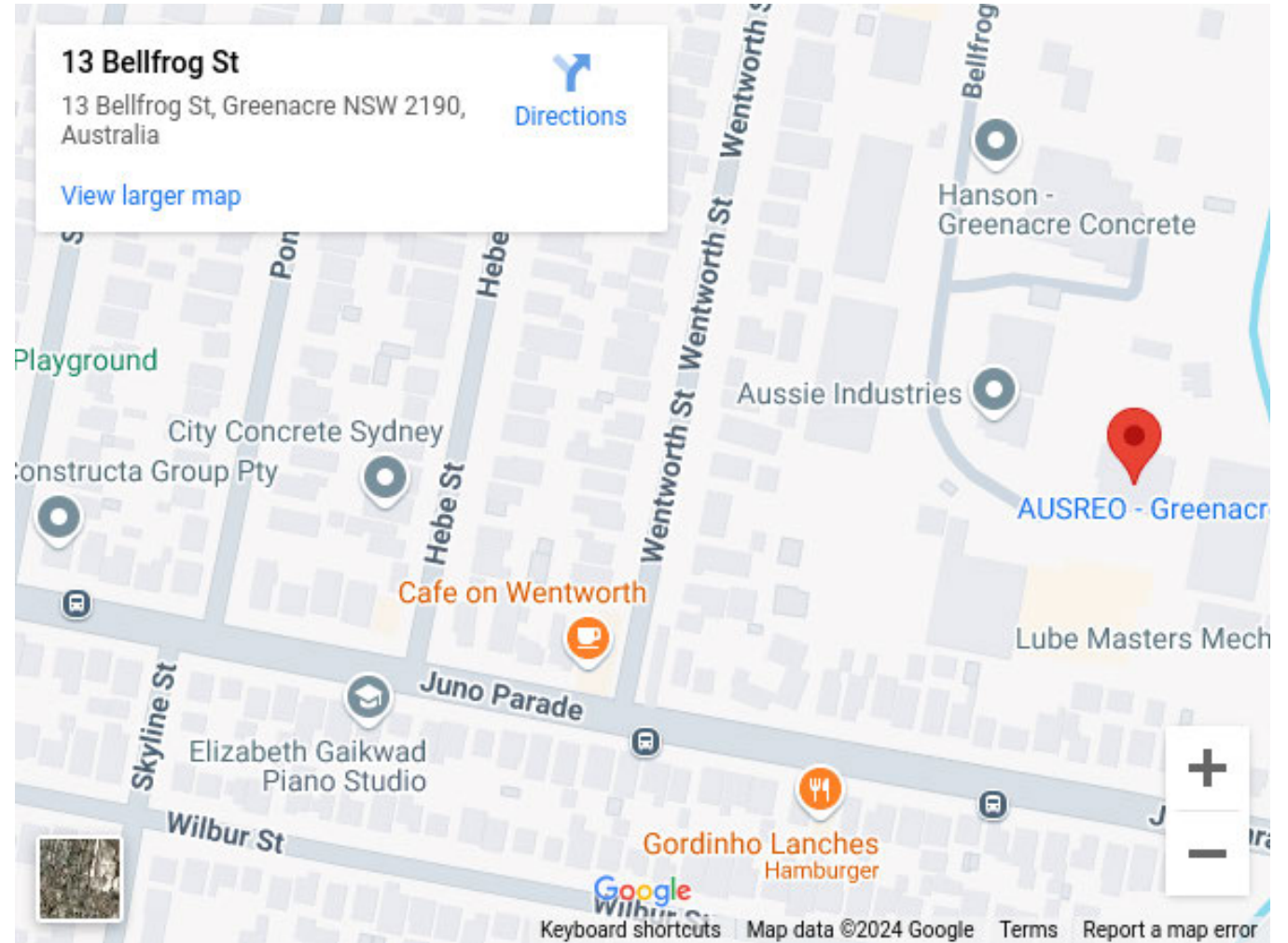




SITE DETAILS

13 Bellfrog Street Greenacre, 2190 NSW

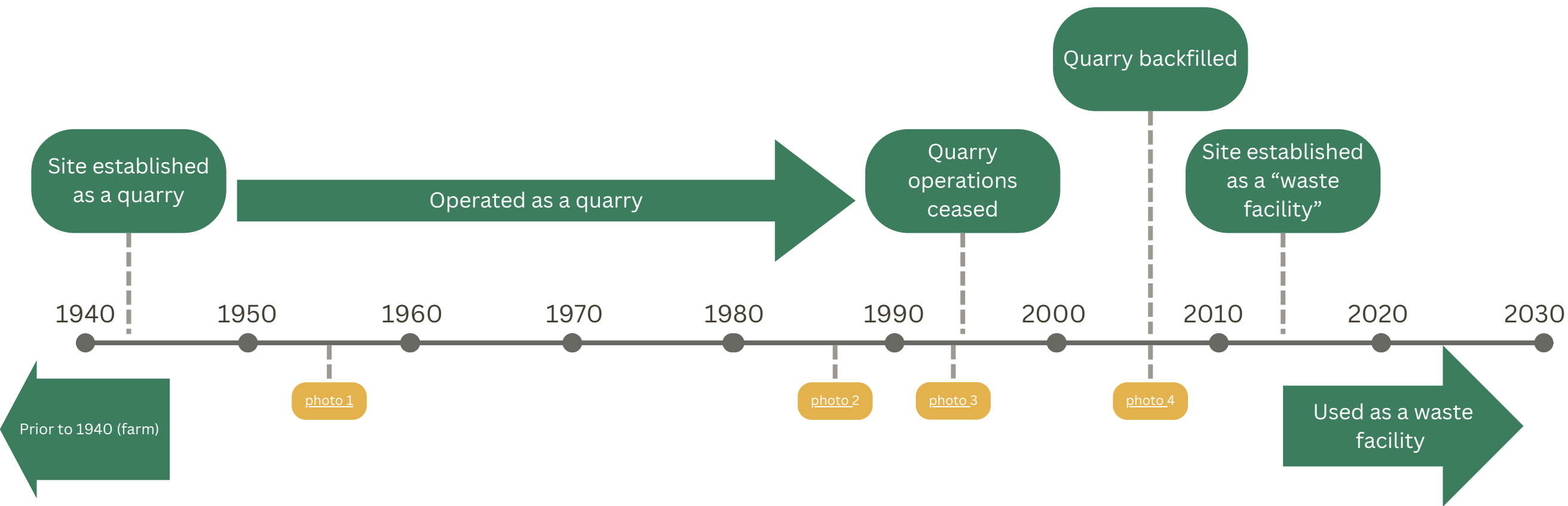
Operated as a “waste facility” by
Aussies Skips Recycling





SITE HISTORY

- Site and the neighbouring properties were established as a quarry prior to 1943
- Quarry operations ceased between 1991 and 1998
- The Site was backfilled between 1998 and 2005
- The area sat vacant until establishment of an industrial premise in 2014
- Since then, the Site has been used as a Waste Facility





1955

1986





1994

2005







HERITAGE CONTEXT

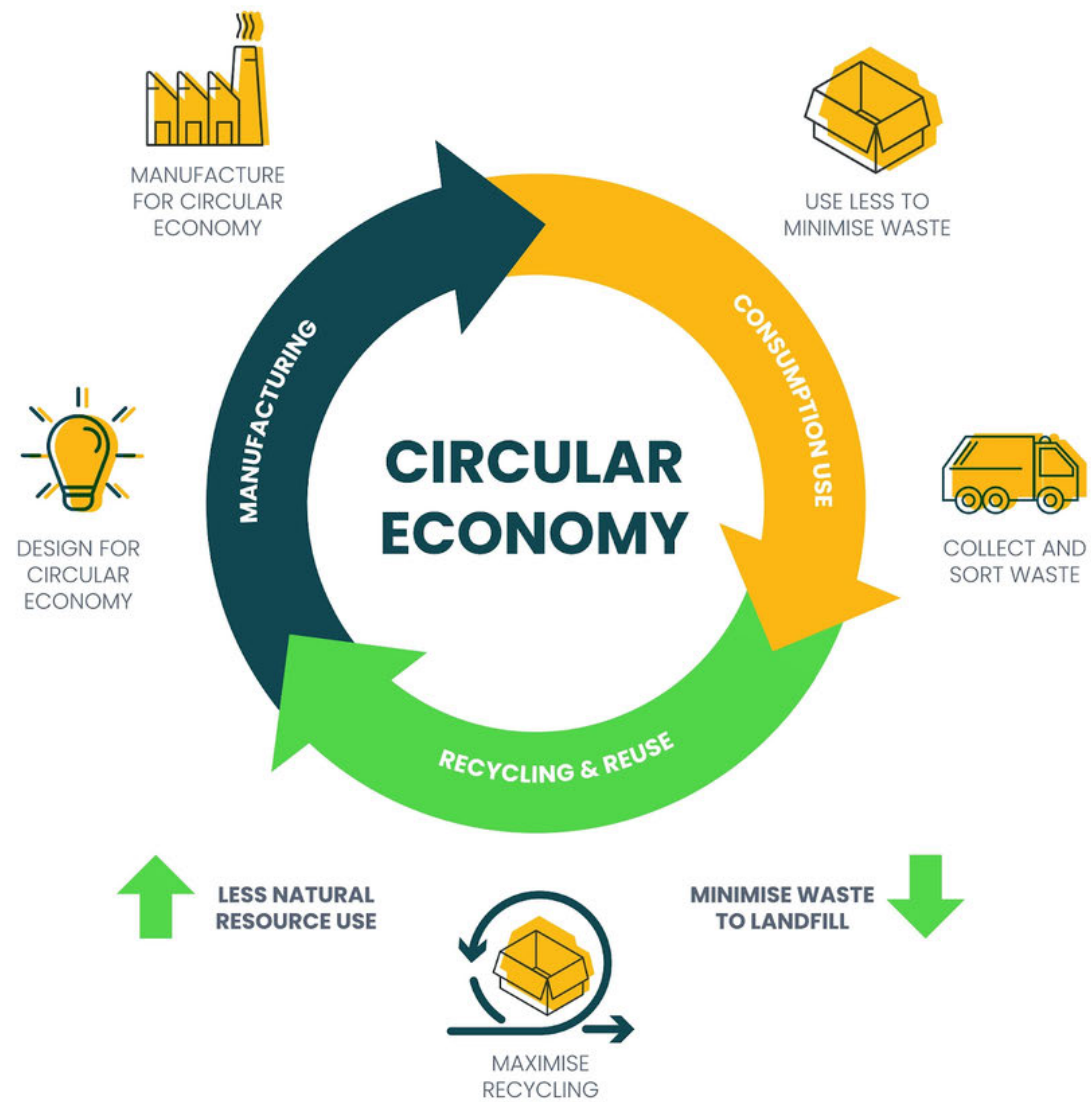
- According to the AHIMs report there are no registered sites within the 1 km of the Site.
- Cox's Creek is located along the eastern boundary of the Site. This has been significantly altered from its natural condition due to quarrying activities and now is concrete channel.
- The Site contains no native vegetation. There is an exotic grassy swale in the eastern portion of the Site (there is no change or alternation to this part of the Site).

PROPOSED DEVELOPMENT

- Increase in scale of operations (increase in amount of material on Site at any one time)
- Expansion of waste types to be received on Site
 - addition of potential acid sulfate soil & actual actual acid sulfate soil
 - addition of mixed “construction and demolition waste” (C&D) in the form of skip bin waste
 - Expansion of soils contaminant threshold limit
- Installation of soil processing equipment
- Installation of concrete processing equipment

PROPOSED DEVELOPMENT - OBJECTIVES

- Increasing the recycling efficiency within the Sydney region
- Provide a strategic location for more challenging waste to be recycled
- Aid in achieving circular economy targets for the region



DISTURBANCE AND ARCHAEOLOGICAL POTENTIAL

It is important to note that the following describe the archaeological potential of the Site. It is acknowledged that if the Site has little or no archaeological potential, the Site may still have cultural significance to the Aboriginal community.

Review of information and aerial imagery indicates that past European land use has led to the clearing of the land and extensive excavations through quarrying operations. The Australian Soil and Land Survey Field Handbook (CSIRO 2010) considers this to be “major disturbance”.

Major disturbance to sections of the landscape: **Sub-surface Aboriginal objects with potential conservation value have a negligible probability of being present within the Site.**

POTENTIAL HARM CAUSING ACTIVITIES

We note that due to past quarrying operations there is a negligible probability of Aboriginal objects being present on the Site. To take a conservative approach, we have reviewed the activities to occur as part of this development under the assumption that there could be potential objects present. If no impact to potentially present objects was determined, it could be concluded that no further assessment of impact on Aboriginal objects would be required.

Construction activities

- No changes to the hardstand or earthworks are proposed. Plant equipment to be installed on the existing hardstand.
- **No potential harm to Aboriginal objects**

Operational activities

- No changes to the hardstand or operational footprint.
- **No potential harm to Aboriginal objects**

ARCHAEOLOGICAL POTENTIAL DETERMINATION

No Aboriginal objects and/or features of cultural and archaeological significance were identified during the desktop review. A review of previous land disturbance indicates a long history of quarrying operations. The proposed development is also minor in nature, consisting of no expansion in footprint or earthwork activities. In review of the level of disturbance and proposed activities, there is a nil possibility of there being Aboriginal objects present on Site or the proposed development causing harm. As such it is believed works may proceed with caution.

METHODOLOGY FOR THIS ASSESSMENT

Due Diligence

- In accordance with the guidelines a due diligence assessment is not necessary.

Test excavation

- In accordance with findings above, it is believed there is negligible probability of Aboriginal objects occurring on Site. Hence, test excavation is not considered necessary

Consultation

- Although the Site has been majorly disturbed through quarry operations and there is negligible probability of Aboriginal objects occurring on Site, 4Pillars recognise the Site may still have cultural significance to the Aboriginal community. As such, has conducted consultation with reference to *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010). The objective is to determine if any parties have interest in the Site that requires further assessment.

Note: a formal Cultural Heritage Assessment Report is not being prepared at this stage. Should the outcomes of consultation indicate a need for further assessment this will be completed.

Consultation

A place may have historic value because it has influenced, or has been influenced by, an historic figure, event, phase or activity. It may also have historic value as the site of an important event. For any given place the significance will be greater where evidence of the association or event survives in situ, or where the settings are substantially intact, than where it has been changed or evidence does not survive. However, some events or associations may be so important that the place retains significance regardless of subsequent treatment. (Australia ICOMOS, 1999 p.11).

Consultation overview:

- Stage 1 - Notification of project proposal and registration of interest (completed)
- Stage 2 - Presentation of information about the proposed project (this stage)
- Future stages - To be continued with outcomes of Stage 2

Questionnaire:

As part of this phase of consultation we have established a questionnaire. This questionnaire is to further understand the importance of the Site for the people who have registered their interest in the proposed development.

This survey will take about 10 minutes to complete, we would greatly appreciate you filling out all questions, however only a few questions are required.

[Click here to access questionnaire](#)

If you have further feedback, questions or concerns we would be eager to hear from you, please contact 4Pillars directly at hello@4pillars.com.au.

[Click here to contact 4Pillars directly.](#)

Note: Art that has been utilised within this webpage by INYADOT ART. INYADOT ART has been engaged by Aussie Industries to translate the internal values and principles within their organisation and how these values would reverberate externally when building relationships and engagement with Aboriginal and Torres Strait Islander peoples, businesses and community.

Aussie Skips Recycling - Site Upgrades Heritage Consultation

* Required



Survey Details

This survey is to further understand the importance of 13 Bellfrog Street, Greenacre NSW 2190 (the Site) for the people who have registered their interest in the proposed development.

This survey will take about 10 minutes to complete, we would greatly appreciate you filling out all questions, however only a few questions are required.

If you have further feedback, questions or concerns we would be eager to hear from you, please contact 4Pillars directly at hello@4pillars.com.au.

Contact details

1. Please provide your name

2. Please provide you email address *

So we can contact you for further consultation if needed

Survey Questions

3. Does the Site hold any social, spiritual or cultural values to you or your community (that you are aware of)? If so what are these values and are they confined to particular parts of the Site?

4. Why are these parts or the whole of the Site culturally significant to you?

5. Are you aware of any previously unidentified known culturally significant places present within the Site? If so where are they located?

6. Are you aware of any previously unidentified Aboriginal objects or Aboriginal places present within the Site? If so where are they located?

7. Are you aware of any previously unidentified natural or archaeological resources present within the Site? If so where are they located?

8. Are there any traditional stories or legends associated with the Site?

9. Are there any recollections of Aboriginal people living within the Site that you are aware of?

10. Is there any information to suggest the presence of burials within the Site?

11. Are any traditional flora or fauna resources associated with the Site?

12. Does the Site have any sensory scenic or creatively significant cultural values? If so what are these values and are they confined to particular parts of the Site and where are they located?

13. Are there any gender specific cultural values associated with the Site which cannot be raised in a male presence? If so how would you like to proceed?

14. Are there any gender specific cultural values associated with the study are which cannot be raised in a female presence? If so how would you like to proceed?

15. If you have answered yes to any of the above questions, will the proposed development harm any of the identified cultural heritage and archaeological values of the Site? if so do you have any suggestions on the mitigative strategies for the management of the cultural and archaeological values of the Site?

16. Do you have any concerns not yet raised in this survey *

- ☐ Yes
- ☐ No
- ☐ Maybe

17. If you have answered "yes" or "maybe" to question 16 please outline the concerns not yet raised in this survey

18. At this stage do you support the proposed development and its methodology? *

- ☐ Yes
- ☐ No
- ☐ Maybe

19. Do you believe the information and consultation completed was adequate for you to make an informed decision on the proposed development? *

- ☐ Yes
- ☐ No
- ☐ Maybe

20. Free text to submit any other comments not captured by above questions

Thankyou

Thankyou for completing the survey.

If you have further feedback, questions or concerns we would be eager to hear from you, please contact 4Pillars directly at hello@4pillars.com.au.

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ID				
Start time	5/30/24 16:27:45	5/31/24 13:10:03	6/4/24 21:17:37	6/27/24 15:19:46
Completion time	5/30/24 16:33:51	5/31/24 13:18:29	6/4/24 21:20:09	6/27/24 15:32:47
Does the Site hold any social, spiritual or cultural values to you or your community (that you are aware of)? If so what are these values and are they confined to particular parts of the Site?	No	Well the grounds here would of been used for hunting and walking so yes.		No it does not but with the existing quarrying the site might have artifacts inbound when filling the quarry site.
Why are these parts or the whole of the Site culturally significant to you?	We just want to protect land that could have cultural significance	These grounds would of been used for hunting purposes which is culturally significant.		Because of the fact it might have artifacts on the site.
Are you aware of any previously unidentified known culturally significant places present within the Site? If so where are they located?	No	Not that I'm aware of.		No but might be in the ground of the site
Are you aware of any previously unidentified Aboriginal objects or Aboriginal places present within the Site? If so where are they located?	No it would be impossible to find out unless a excavation has undertaken	Not that I'm aware of but chances are you could find artefacts on the land where it hasn't been disturbed.		No I am not aware of any aboriginal places or objects with in the site of the existing quarry
Are you aware of any previously unidentified natural or archaeological resources present within the Site? If so where are they located?	No	No		No I am not aware of the archaeological value of the site.
Are there any traditional stories or legends associated with the Site?	Not that I'm aware of	I'm not sure		Yes it was a brick quarry 1943 to 1993 for boral brick to make the brick for the footing of the fibro house of the commission housing in the local area of greenace to chesterhill.
Are there any recollections of Aboriginal people living within the Site that you are aware of?	Not that I recall	There's big chances that there are but not aware.		No there are not any aboriginal heriage or site around the site of the location.
Is there any information to suggest the presence of burials within the Site?	I am not aware of any	No.		No there not present of any aboriginal burial or burial on the site of the former brick pit.
Are any traditional flora or fauna resources associated with the Site?	I'm not aware	Kangaroos, wallaby, emu, goanna etc.		No there are not on this site but there is on the Enfield logistics lookout down the road. Including wattles and australia paperback tree.
Does the Site have any sensory scenic or creatively significant cultural values? If so what are these values and are they confined to particular parts of the Site and where are they located?	Not aware	Not sure		Yes it does due to the quarry at the site.
Are there any gender specific cultural values associated with the Site which cannot be raised in a male presence? If so how would you like to proceed?	Not that I'm aware	Not sure.		No there is not any gender specific cultural values associated with the site at handed.
Are there any gender specific cultural values associated with the study are which cannot be raised in a female presence? If so how would you like to proceed?	Not that I'm aware of	Not sure.		No
If you have answered yes to any of the above questions, will the proposed development harm any of the identified cultural heritage and archaeological values of the Site? if so do you have any sugg...	N/a			No if the site is overturn and new fill be place at the site for construction with recycled aggregate and filling sand to make a base for the site work and fill be washed and artifacts removed for the process for such work.
Do you have any concerns not yet raised in this survey	No	No	No	No
If you have answered "yes" or "maybe" to question 16 please outline the concerns not yet raised in this survey				
At this stage do you support the proposed development and its methodology?	Yes	Yes	Maybe	Yes
Do you believe the information and consultation completed was adequate for you to make an informed decision on the proposed development?	Yes	Yes	Maybe	Yes
Free text to submit any other comments not captured by above questions		.	Since I have not visited the site it is hard to answer these questions. It's also alot of information to provide.	

Respondent attended site in December 2024 and provided no further comments