



Main Works (Construction) Heritage Unexpected Finds Checklist – SYD091 Sydney Data Centre, 43-61 Turner Rd, Gregory Hills

FDC Construction (NSW) Pty Ltd

Report

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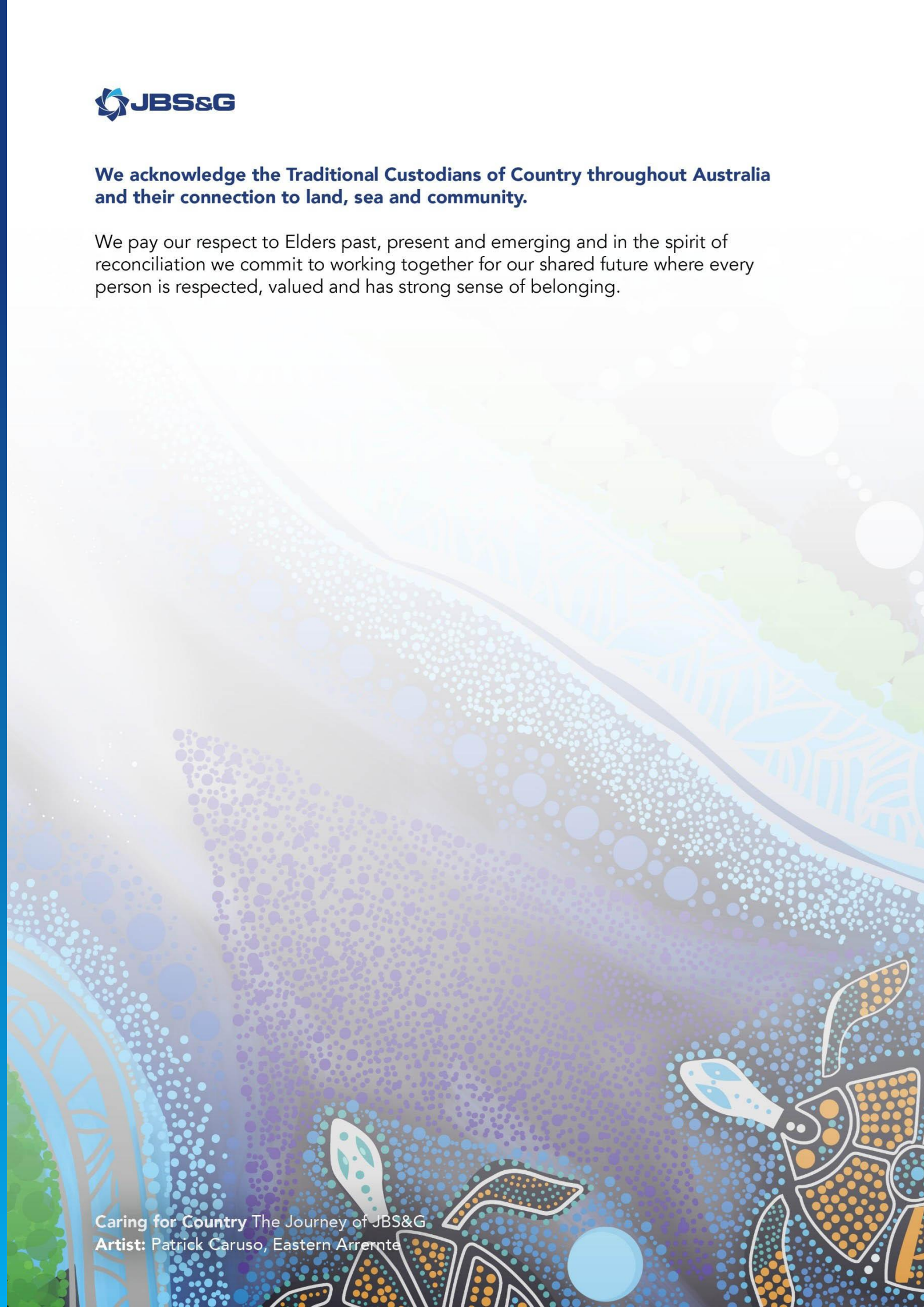




We acknowledge the Traditional Custodians of Country throughout Australia and their connection to land, sea and community.

We pay our respect to Elders past, present and emerging and in the spirit of reconciliation we commit to working together for our shared future where every person is respected, valued and has strong sense of belonging.

Caring for Country The Journey of JBS&G
Artist: Patrick Caruso, Eastern Arrernte



Definitions

Term	Definition
Consent	Development consent SSD - 68013714
DPHI	Department of Planning, Housing and Infrastructure
Find	A suspected heritage item/object discovered on site during main works
Ha	hectares
Heritage item	As defined under the <i>National Parks and Wildlife Act 1974</i> and the <i>Heritage Act 1977</i>
Heritage NSW	Heritage Council of NSW as defined under the <i>Heritage Act 1977</i>
LGA	Local Government Area
SSDA	State Significant Development Application
The site	43, 49, 55, 61 and part of 67 Turner Road, Gregory Hills, NSW
Main Works	Construction of the development on the site as per the consent

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1. Introduction

1.1 Project Description

JBS&G Australia Pty Ltd (JBS&G) was engaged by FDC Construction (NSW) Pty Ltd (FDC) to prepare a Heritage Unexpected Finds Protocol, in accordance with the State Significant Development Application (SSDA) Consent SSD-680137154 for the construction of the proposed SYD091 Main Works project, located at 43-61 Turner Road, Gregory Hills, NSW (the site). This Heritage Unexpected Finds Protocol has been prepared for incorporation with Construction Environmental Management Plan (CEMP) developed for the site by FDC. The Consent enables the following works to occur:

- Construction of 12 data halls;
- A high voltage substation;
- Emergency back-up generators;
- Cooling plant, diesel and lithium-ion battery storage; and
- Associated infrastructure, landscaping and earthworks.

FDC are currently delivering the SYD091 Early Works under a Camden Council Development Application (DA) Consent (DA/2024/616/1.). This approval enables delivery of:

- The demolition and clearance of existing structures and vegetation;
- Completion of bulk earthworks and installation of retaining walls; and
- Public Domain works which includes provision of HV power, stormwater installation and pavement build ups with a new access road.

In its existing state, the development has undergone dam decommissioning, site clearance, bulk earthworks, and sediment erosion and control measures have been implemented. Site access will be via Central Hills Drive with predominant neighbouring properties located on this side of site. There are industrial neighbouring properties to White Cliffs Avenue, opposite side of Turner Road and residential area along Pioneer Street. There is a Riparian Zone located east of 61 Turner Road which will be fenced off to deter any access into this area.



Figure 1-1: Site Aerial (source: Nearmaps)

The SSDA approved Main Works SSD-680137154 will occur concurrently with the Early Works DA/2024/616/1. This Heritage Unexpected Finds Protocol has been prepared in accordance with the consent conditions outlined in **Section 1.6**.

Effective implementation of the CEMP and its Sub-Plans will enable the Project to comply with the Consent Conditions, the mitigation measures (identified in the consent, SSD-680137154), and all relevant Acts, Regulations, Standards, and Government Policies.

This plan applies to all staff, workers, and sub-contractors involved in the construction project.

1.2 Staging

This development will be delivered in a single stage with the Early Works and Main Works delivered concurrently under the two development approvals previously discussed:

DA/2024/616/1 – Early Works

- Early Works – Bulk Earthworks, Retaining Walls and Public Domain Works

SSD-680137154 – Main Works

- Construction Certificate 1 – Bulk Excavation and Substructure Works;
- Construction Certificate 2 – Remaining Structure, Façade, Fit out of ROMP 1 & 2 and landscaping; and
- Main HV Substation Works are delivered prior to occupation by an accredited contractor in accordance with the utility provider.

Refer to **Figure 1-2** for Early Works extent and **Figure 1-3** for Main Works extent.

The overall Early Works site plan is shown on **Figure 1-2** below. The Early Works includes decommissioning of pre-existing dams, demolition of dwellings, bulk earthworks, as well as the delivery of surrounding roads.

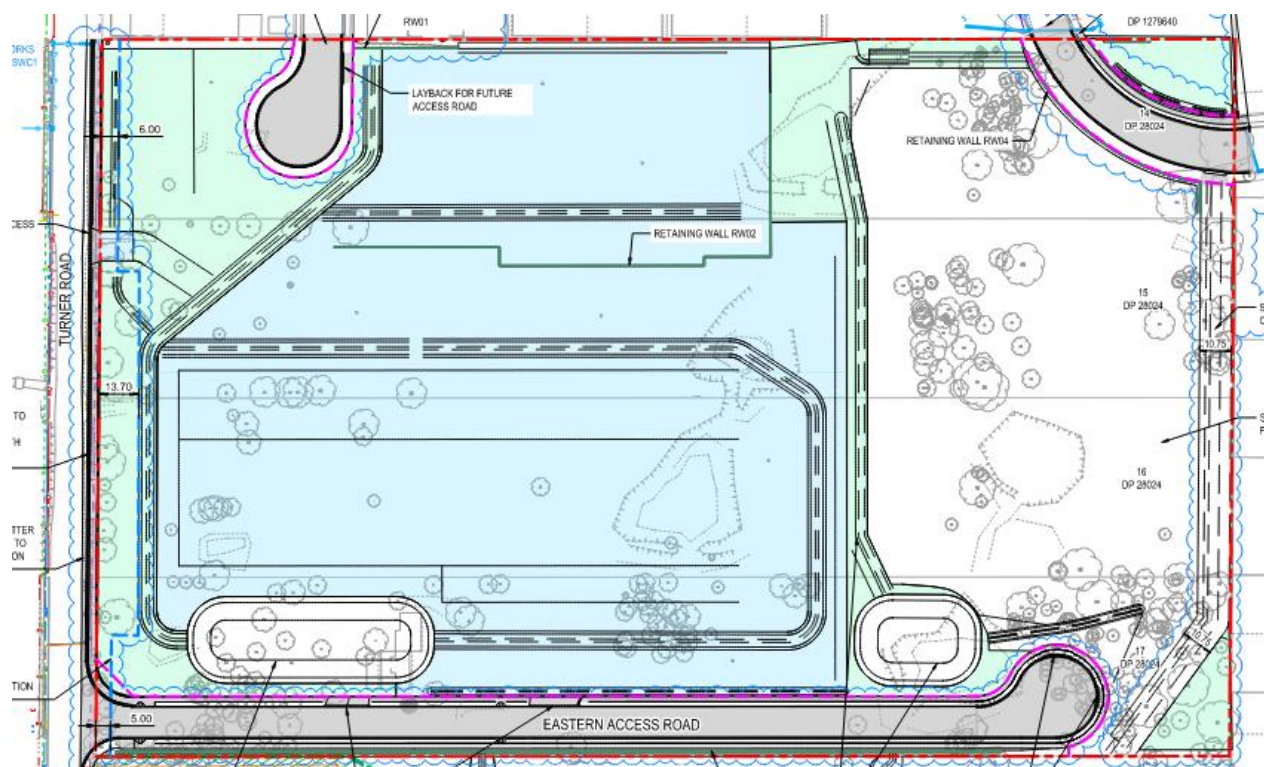


Figure 1-2: Early Works Site Diagram

The overall site plan for the Main Works is shown on **Figure 1-3** below. The 12 Hall Data Centre is split among two levels and is surrounded by landscaped areas, pavements and ancillary buildings.

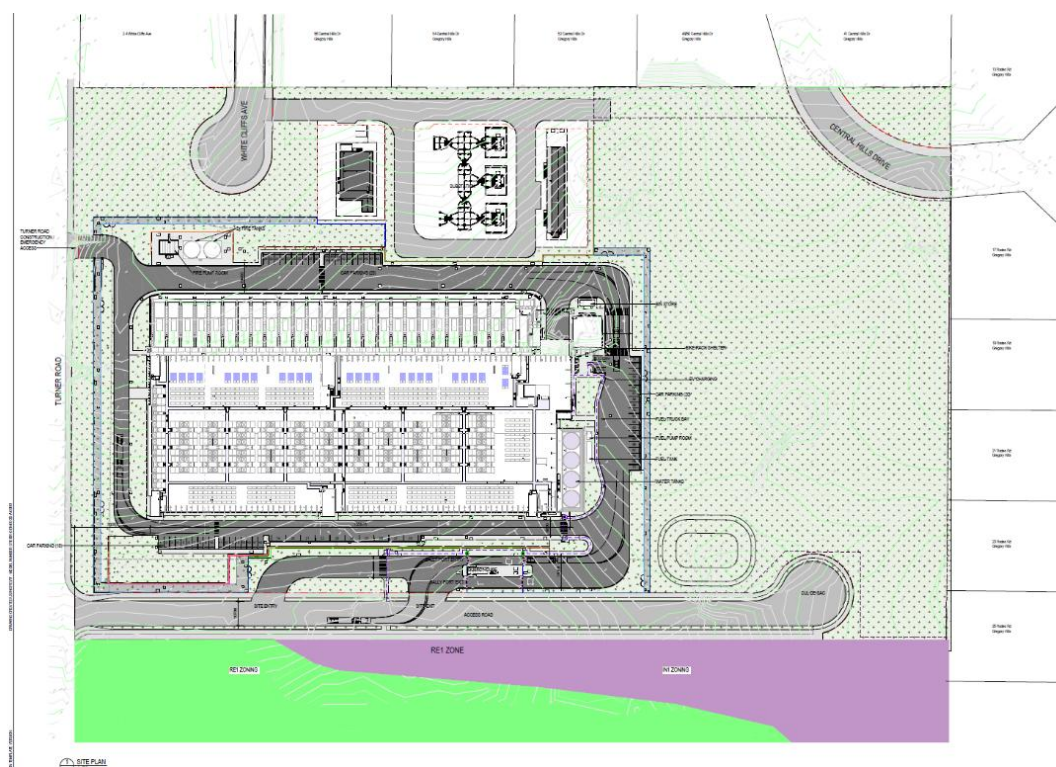


Figure 1-3: Main Works Site Diagram

1.3 Project Location

Refer to Figure 1-4 below for the Site Location. The site is located at Lot 14, 15, 16 and 17, DP 2802, 43-61 Turner Road, Gregory Hills, NSW, 2557, within the Camden Local Government Area (LGA) and is governed by the Turner Road Precinct Development Control Plan (DCP) 2018. The Project is bound by Turner Road to the south, and Rodeo Drive to the north. On the east side of the project, there is an existing nature reserve, and the west contains several existing industrial developments.



Figure 1-4: Site Location

Refer to **Figure 1-5** for Site Overlay. The site is approximately 9.74 hectares (ha) and situated within a General Industrial (IN1) zone, with adjacent land uses including IN1 and Business Development (B5) to the north, a mix of Public Recreation (RE1) and IN1 to the east, Productivity Support (E3) to the south, and IN1 to the west.

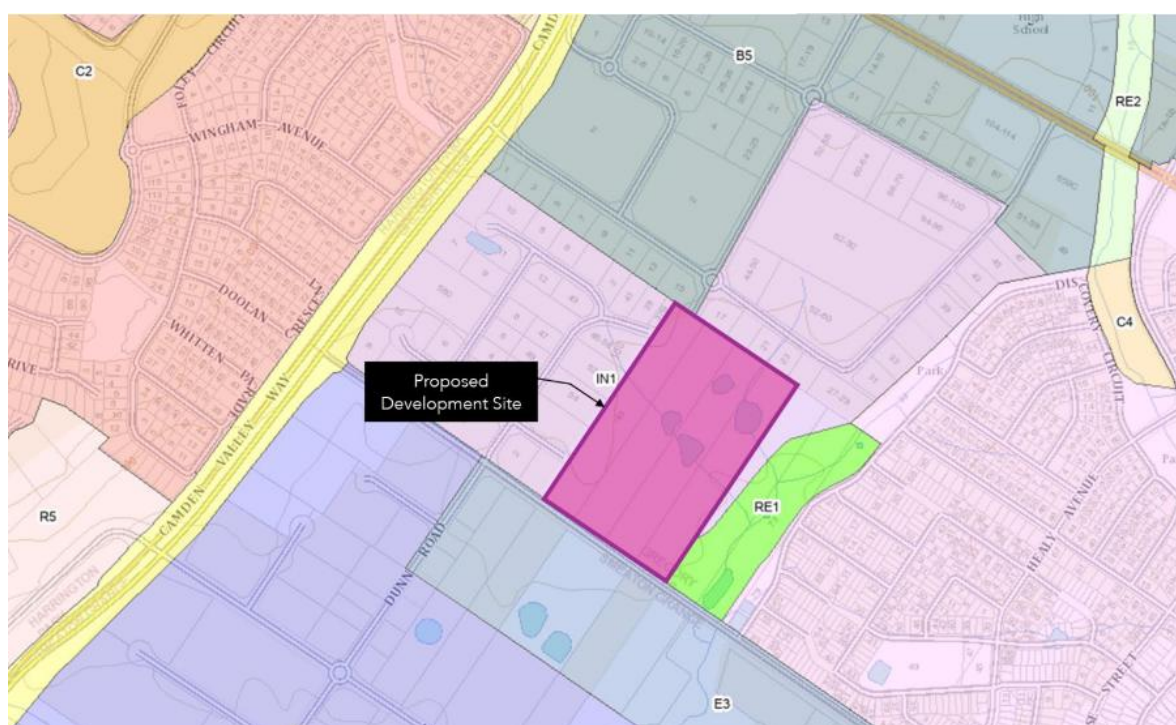


Figure 1-5: Site Overlay

1.4 Project Program

The overall Project Program is outlined below.

Table 1-1: Project Program

Early Works Approved Via <i>DA/2024/616/1</i>	
Early Works	October 2025 to November 2028
Main Works Approved Via <i>SSD-680137154</i>	
Earthworks	July 2026 to October 2026
Structure and Building Envelope	August 2026 to June 2028
Internal Fit Out	January 2027 to October 2028
Commissioning	April 2028 to November 2028

1.5 Scope

The purpose of this document is to outline the actions to be taken when potential Non Aboriginal heritage items are unexpectedly encountered during main works on site (from excavation or construction activities) (referred to as a 'find'). This document describes a procedure to ensure that any heritage items are identified and managed in the aim of being consistent with obligations under the *Heritage Act 1977* (NSW).

This document pertains to construction main works on site and has been developed with reference to NSW Governments Unexpected heritage finds procedure (NSW Government, 2025) although this procedure was developed for a small-scale mining site, it is still regarded as applicable to this document.

This procedure assumes that an appropriate level of Aboriginal and non-Aboriginal heritage assessment has been completed prior to commencing main works on site. It also assumes that early work activities are completed prior to commencing main works.

1.6 SSDA Conditions Relevant to this Plan

Table 1-2 provides a summary of the relevant consent conditions from the main construction development consent (SSD-680137414.) The summary details the consent requirements which are addressed in this Heritage Unexpected Finds Protocol, and where the relevant procedures and/or information can be found.

Table 1-2: Relevant conditions from the consent (SSD-68013714)

Condition number	Condition	Applicability to this document
<i>Aboriginal Heritage</i>		
<i>Unexpected Finds Protocol</i>		
B31	<i>If any item or object of Aboriginal heritage significance is identified on site: (a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately; (b) a 10 m wide buffer area around the suspected item or object must be cordoned off; and (c) Heritage NSW must be contacted immediately.</i>	Referenced in this document (see Section 4).
B32	<i>Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974.</i>	Referenced in this document (see Section 4).
<i>Non- Aboriginal Heritage</i>		
<i>Unexpected Finds Protocol</i>		
B33	<i>If any non-Aboriginal archaeological relics are uncovered during any works being carried out for the development: (a) all work in the immediate vicinity of the suspected relic(s) must cease immediately; (b) Heritage NSW must be contacted immediately; and</i>	Incorporated into Section 5

	<i>(c) the suspected relic(s) must be evaluated, recorded and, if necessary, excavated by a suitably qualified and experienced expert in accordance with the requirements of Heritage NSW.</i>	
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B34	<i>Work in the immediate vicinity of any suspected non-Aboriginal archaeological relic(s) must not recommence until this has been authorised by Heritage NSW.</i>	Incorporated into Section 5
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Appendix 3 Applicant's Management and Mitigation Measures

Non – Aboriginal heritage

NAH01 – Risk of impacting heritage items	<i>A Non-Aboriginal Heritage Unexpected Finds Protocol will be developed and implemented. The Protocol will include measures to deal with any unanticipated archaeological deposits or skeletal remains found during construction. It will require works within 10 metres of the finds to stop immediately. It will also require the contractor to immediately notify the Proponent so they can assist in coordinating the next steps, which are likely to involve consultation with an archaeologist. Where required, further archaeological work and/or approvals will be carried out and obtained before work restarts in this area.</i>	Incorporated into Section 5
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Appendix 3 Applicant's Management and Mitigation Measures

Aboriginal Cultural heritage

AH01 – Overall Aboriginal heritage impact	<i>An Aboriginal Heritage management Plan will be prepared for the Proposal which will include:</i> • An unexpected Finds Procedure • Heritage Induction • Procedure for ongoing Consultation	Referenced in this document (see Section 4).
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2. Types of Unexpected Heritage Items

Below are definitions for heritage items. If any item/object is found on site that is suspected to fall under these definitions, or otherwise suspected to be of heritage significance (I.e. a 'find'), the relevant unexpected finds protocol is to be followed (**Section 4** and/or **Section 5**). Some examples are provided **Appendix A**.

Aboriginal Heritage

An Aboriginal Object and Aboriginal remains are defined under the National Parks and Wildlife Act 1974 as:

"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."

"Aboriginal remains means the body or the remains of the body of a deceased Aboriginal person, but does not include—

- (a) a body or the remains of a body buried in a cemetery in which non-Aboriginal persons are also buried, or*
- (b) a body or the remains of a body dealt with or to be dealt with in accordance with a law of the State relating to medical treatment or the examination, for forensic or other purposes, of the bodies of deceased persons."*

Non-Aboriginal Heritage

Under the Heritage Act 1977 the term 'relic' is defined:

"relic means any deposit, artefact, object or material evidence that—

- (a) relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and*
- (b) is of State or local heritage significance."*

3. Key Personnel and Associated Responsibilities

Relevant accountabilities in the event of an unexpected find are contained in **Table 3-1**.

Table 3-1: Key Personnel and Responsibility regarding unexpected finds.

Position	Responsibility
All Contractors, staff, site personnel and site visitors	Report any suspected or known unexpected finds to the Senior Site Manager and follow the unexpected finds protocol.
Senior Site Manager	Ensure that the relevant protocol is followed.
Client	Be aware of any unexpected finds
Client Environment Point of Contact (POC)	Be aware of any unexpected finds

4. Aboriginal Heritage Unexpected Finds Protocol

An Aboriginal Heritage Management Plan (AHMP) is understood to be in the process of being prepared by ARUP Australia Pty LTD, in accordance with AH01 from the consent. The AHMP is to be prepared prior to the commencement of construction. Any specific recommendations from the AHMP are to be followed and reference this protocol (AHMP) if an unexpected Aboriginal find is discovered on site.

5. Non-Aboriginal Unexpected Finds Protocol

If any non-Aboriginal archaeological relics/items/objects (find) are uncovered during any works being conducted for the development the following protocol is to be followed:

1. All work in the immediate vicinity (at least 10 m) of the suspected find must cease immediately and establish a 'no go' zone around the find;
2. Immediately notify the Senior Site Manager, Client and Client Environment POC. If the unexpected find is human skeletal remains inform NSW Police (in the instance of suspected human skeletal remains only);
3. Heritage NSW must be contacted immediately;
4. Complete a preliminary assessment and recording of the find;
5. The suspected relic(s) must be evaluated, recorded and, if necessary, excavated by a suitably qualified and experienced expert in accordance with the requirements of Heritage NSW. This may also involve other archaeological work and/or approvals to be conducted and obtained (before work restarts in this area);
6. Receive authorization by Heritage NSW to recommence works in the immediate vicinity of the find - Work must not recommence prior to this;
7. Update any relevant plans (e.g., Construction Environmental Management Plan, Heritage Management Plan); and
8. Resume works and implement any relevant plans after approval is provided by any relevant authorities.

Further details on the protocol in checklist format are in **Table 5-1** below.

Table 5-1 Unexpected Finds Protocol Checklist

Task	Responsibility	Completed? (Fill in in the instance of an unexpected find)
All work in the immediate vicinity (at least 10 m) of the suspected relic(s) must cease immediately and establish a 'no go' zone around the find.	All	
Establish a 'no-go Zone' around the item (at least 10 m) using high visibility fencing where practical, otherwise consider using flags or cones.	Senior Site Manager to coordinate	
Immediately notify the Senior Site Manager of the find, Client and Client Environment POC. If the unexpected find is human skeletal remains inform NSW Police (in the instance of human skeletal remains only).	Individual/persons who discovered the 'find'	
Heritage NSW must be contacted immediately and informed of the find	Senior Site Manager	
Provide any relevant details on the find such as location, description of the object, management measures (e.g. no-go zone) and condition of the object to Heritage NSW.	Site Personnel	
Complete a preliminary assessment and recording of the item	Site Personnel	
Take a photograph of the find and include a scale for reference (a photographic scale, otherwise use another item you have on you, e.g. keys, wallet etc). Record any other relevant details (number of objects, type, shape, material etc.).	Senior Site Manager to coordinate	
The suspected relic(s) must be evaluated, recorded and, if necessary, excavated by a suitably qualified and experienced expert in accordance with the requirements of Heritage NSW. This may also involve other archaeological work and/or approvals to be conducted and obtained (before work restarts in this area).	Suitably qualified and experienced expert	
A Management plan is to be prepared for the find if it is deemed to be a heritage object/item.	Suitably qualified and experienced expert	
Receive authorization by Heritage NSW that works in the immediate vicinity of the find can recommence - Work must not recommence prior to this.	Heritage NSW and Senior Site Manager	
Update any relevant plans (e.g., Construction Environmental Management Plan, Heritage Management Plan)	Senior Site Manager to coordinate. Input from ssuitably qualified and experienced expert may be required.	
Resume works and implement any relevant plans	Senior Site Manager and all site personnel	

6. Limitations

Scope of services

This report (“the report”) has been prepared by JBS&G in accordance with the scope of services set out in the contract, or as otherwise agreed, between the Client and JBS&G. In some circumstances, a range of factors such as time, budget, access and/or site disturbance constraints may have limited the scope of services. This report is strictly limited to the matters stated in it and is not to be read as extending, by implication, to any other matter in connection with the matters addressed in it.

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7. References

DPE, 2018. *Turner Road Precinct - Development Control Plan January 2018*, s.l.: Department of Planning and Environment.

NSW Government, 2024. *Unexpected heritage finds procedure*, s.l.: s.n.

NSW Government, 2025. *Unexpected heritage finds Procedure*, s.l.: s.n.

Appendix A Examples of potential finds

Exert from Unexpected Heritage finds procedure (NSW Government, 2024)

Cultural heritage you may encounter



Stone artefact sites

Comprising stone artefact scatters and isolated artefacts which are formed through the discard of stone tools or debris from the stone-tool manufacturing process.



Culturally modified trees

Culturally modified trees (scarred or carved) are trees that have been modified by Aboriginal people, usually from the removal of bark.

They are typically of high cultural value to Aboriginal peoples.



Grinding grooves

Grinding grooves are generally elongated narrow depressions in abrasive rocks (particularly sandstone), created by the manufacture and maintenance of cutting edges on stone axes and other tools and/or weapons.



Hearths/earth ovens

Heat-retainer hearths, or earth ovens, are the remnants of features utilised by Aboriginal people to cook food.

Often comprising scattered baked clay balls or stones used to retain heat (i.e., 'heat retainers').



Stone arrangements

An arrangement of rock or stones, each of which may be approximately 30 cm in size, laid out in a pattern extending over several metres.

Historical heritage you may encounter



Structural remains including standing buildings or below ground archaeological remains

Can include building ruins (potential heritage items), in situ or fragmented single course sandstone blocks, bricks or other stone material, chimney bases, slab hut remains (timber structural remains), building footings or foundations and post holes.



Artefacts

Can include broken or whole glass, ceramic or earthenware bottles, containers or plates, clay or bone tobacco pipes, pieces of metal with or without identifiable markings (such as makers marks or other writing).



Below ground infrastructure

Can include wells, cisterns or cesspits made from sandstone, brick or local stone materials, drainage features such as culverts (timber or stone).



Other infrastructure

Former roads, redundant rail alignment and associated equipment, former mining infrastructure including tunnels and shafts.

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