

To whom it may concern,

RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT REQUEST FOR FURTHER INFORMATION FOR 2-8 POPES ROAD, WOONONA

Austral Archaeology Pty Ltd (Austral) has been commissioned by The Project Co. on behalf of Illawarra Retirement Trust (the Proponent) to prepare an Aboriginal Cultural Heritage Assessment (ACHA) for the property of 2-8 Popes Road, Woonona, New South Wales (NSW).

The following letter is in response to the Request for Further Information (RFI) received from Heritage NSW on 22 August 2025. Please see the table below for Heritage NSW’s comments and a summary of how they have been addressed by Austral.

Heritage NSW Comment	Austral’s Response
<p>1. We request that additional documentation of the consultation process be provided. The applicant needs to provide evidence that consultation was kept continuous, as the last consultation recorded in the ACHAR is dated September 2024. Heritage NSW required that consultation with Registered Aboriginal Parties (RAPs) is continuous. Under our policy and guidelines, breaks in consultation of over six months may not constitute continuous consultation.</p>	<ul style="list-style-type: none"> • The final version of the ACHA was supplied to RAPs on 28 April 2025. This correspondence has been included in Chapter 2, Section 2.6 and the updated Appendix B of the ACHA. • A consultation update was supplied to RAPs on 25 November 2025. This correspondence has been included in Chapter 2, Section 2.7 and the updated Appendix B of the ACHA. <u>Austral acknowledges a gap of 7 months between the final ACHA being supplied to stakeholders and a consultation update being provided.</u>
<p>2. Heritage NSW notes that the Aboriginal Heritage Information Management System (AHIMS) search is greater than 12 months old at the time of submission. Heritage NSW generally requires, as per Requirement 1b of the <i>Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW</i> (DECCW 2010), that AHIMS searches are less than 12 months old. Please provide an updated AHIMS search.</p>	<ul style="list-style-type: none"> • An updated AHIMS search was undertaken on 21 November 2025. One additional site was identified in the new search, Popes Road Scarred Tree (AHIMS 52-2-4988), the site included within the ACHA. • The updated results have been included within the ACHA, specifically Chapter 4.2.2 and Appendix A of the ACHA.
<p>3. The culturally modified tree (AHIMS #52-2-4988) is currently located outside of the project area and the ACHAR states it will be avoided though this may change as the development progresses. Please ensure that if the modified tree is marked for conservation, this is a clearer commitment in the Environmental Impact Statement (EIS) and ACHAR.</p>	<ul style="list-style-type: none"> • Clearer wording regarding the strategies to minimise harm to the moderate potential area and Popes Road Scarred Tree (AHIMS 52-2-4988) has been included in Chapter 10, Section 10.3 of the ACHA.

Heritage NSW Comment	Austral's Response
4. As per Requirement 23 of <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> (DECCW 2010) the recording of the site must be consistent with Aboriginal scarred trees in New South Wales, a field manual (DEC and Andrew Long 2005). As such, please ensure that a sketch of the tree and scar that includes the location and shape of the scar, location of features (e.g., tool marks), and overall condition of the tree and scar are included in the site recording form.	<ul style="list-style-type: none"> The site recording form for Popes Road Scarred Tree (AHIMS 52-2-4988) was updated and approved by AHIMS on 21 November 2025. The updated site card now includes the details requested by Heritage NSW, including a field sketch, features, and condition of the tree and scar. The original and updated site card have been provided in Appendix C – Site Card of the ACHA.
5. Please include mapping that outlines the area of moderate archaeological potential to be avoided.	<ul style="list-style-type: none"> Figure 9.1 has been updated to include the moderate potential area that is to be avoided in relation to the proposed works.
6. Section 2.6 of the ACHAR requires updating to finalise the dates of consultation.	<ul style="list-style-type: none"> Chapter 2, Section 2.6 has been updated to include the finalised dates of consultation.

If you have any questions regarding this letter, please do not hesitate to contact me at the details below.

Kind regards,



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