

135 Badgerys Creek Road, Bradfield

Aboriginal Cultural Heritage
Assessment Report

Report to Creative Vision

September 2025



 artefact

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EXECUTIVE SUMMARY

Project overview

Artefact Heritage and Environment have been engaged by Creative Vision on behalf of the Bradfield Corporation Pty Ltd (the Applicant) to prepare an Aboriginal Cultural Heritage Assessment Report for the development proposal at 135 Badgerys Creek Road, Bradfield (Lot 7 DP 243457) (the study area). The study area is within the boundaries of the Gandangarra Local Aboriginal Land Council and within the Western Sydney Aerotropolis Precinct. The development proposal would include the construction of a Mixed-Use development (which is generally compliant with the Aerotropolis Precinct Plan).

The development proposal has been declared State Significant Development (State Significant Development–77458970) under the *Environmental Planning and Assessment Act 1979*. Item 19 of the Secretary's Environmental Assessment Requirements issued on 30 January 2025 outlines that Aboriginal Cultural Heritage assessment would be required to inform the Environmental Impact Statement for the development proposal. This Aboriginal Cultural Heritage Assessment Report is submitted to the Department of Planning, Housing and Infrastructure in support of the State Significant Development Application.

This Aboriginal Cultural Heritage Assessment Report considers the impacts of the proposed development on Aboriginal cultural heritage within the study area. It is also informed by the Archaeological Technical Report previously prepared by Artefact Heritage, which is contained within Appendix A of this report (Appendix A – Technical Report). The Archaeological Technical Report identified that a Potential Archaeological Deposit (PAD), 135 Badgerys Creek Road PAD 01, was present across the entire study area and that potential subsurface Aboriginal objects would be impacted by the development proposal. As a result, an Aboriginal test excavation program was conducted across the site.

The cultural heritage assessment includes:

- Assessment of the Aboriginal cultural heritage values of the study area and identification of any specific areas of cultural significance
- Assessment of archaeological potential in the study area
- The results of archaeological survey and the Aboriginal test excavation program within the study area
- Aboriginal stakeholder consultation.

Summary of findings

Based on a combination of archaeological and cultural heritage value, this Aboriginal Cultural Heritage Assessment Report has identified the following:

- No Aboriginal objects were identified in the study area during archaeological survey
- An area of PAD (135 Badgerys Creek Road PAD 01) was identified within the study area. This area was identified as a PAD based on its proximity to watercourses, its apparent low levels of historic disturbance, observations made by representatives of Gandangarra LALC during the

archaeological survey, and the results of other archaeological investigations from the surrounding region

- Following the Aboriginal test excavation program, 135 Badgerys Creek Road PAD 01 has been revised to be identified as 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018)
 - 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018) is located on an intact landform on a slope (gentle incline) within proximity to watercourses and within an area in which minimal historical disturbance has been observed. Based on the 6 stone artefacts identified during the test excavation program, this area has been assessed as a low density artefact scatter which has low significance.
- 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018) would be directly and totally impacted by the proposed development
- No further archaeological mitigation measures are required for the artefact scatter due to the site's assessed low significance.

Recommendations

Based on these findings, the following recommendations have been made:

- SSD Conditions of Consent is required to harm the identified site: 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018)
- Ongoing consultation with the Registered Aboriginal Parties would continue throughout the life of the project, if necessary. For example, ongoing consultation with Registered Aboriginal Parties would take place in the event of any unexpected Aboriginal objects being identified during works
- A heritage induction including an UFP must be prepared and all workers must be inducted prior to the commencement of works
- Any changes that may impact on Aboriginal sites not assessed as part of the project may warrant further investigation and result in changes to the recommended management and mitigation measures
- Long term management of the Aboriginal objects would involve the reburial of the artefact assemblage within a portion of the land that would not be disturbed by the proposed development. Reburial would be undertaken in accordance with Requirement 26 of the Code of Practice
- A copy of this report should be sent to Gandangara Local Aboriginal Land Council for their records.

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NOTE ON LANGUAGE IN QUOTES

A number of quotes used in this report come from documents written in the nineteenth and twentieth centuries by European observers. They have been included because they provide information on the lives of Aboriginal people in the region, though the language used and views expressed by these writers can be offensive and distressing.

GLOSSARY OF TECHNICAL TERMS

Aboriginal cultural heritage: The material (objects) and intangible (mythological places, dreaming stories etc) traditions and practices associated with past and present-day Aboriginal communities.

Aboriginal object: Any deposit, object or material evidence (not being a handicraft made for sale), including Aboriginal remains, relating to the Aboriginal habitation of NSW.

AHIMS: Acronym for 'Aboriginal heritage information management system'. AHIMS is a register that contains information about NSW Aboriginal heritage, and it is maintained by DECCW.

Archaeology: The scientific study of human history, with focus on material remains and ethnographic evidence.

Artefact: An item of cultural material created by humans.

Easting: This is a measurement used to determine location. The easting is the x-coordinate and relates to the vertical lines on a map, which divide east to west. It increases in size when moving

Exposure: The level of ground exposure is based on the whether the landform is eroding, aggrading or stable.

Northing: This is a measurement used to determine location. The northing is the y-coordinate and relates to the horizontal lines on a map, which divide north to south. It increases in size when moving further north.

Potential Archaeological Deposit (PAD): A PAD is a location that is considered to have a potential for subsurface Aboriginal objects. This is determined from a visual inspection of the site, background research of the area and the landform's cultural importance.

Sandstone: Is a sedimentary rock formed from sand-sized grains.

Survey: In archaeological terms, this refers to walking over a surface while studying the location of artefacts and landmarks. These are then recorded and photographed.

Visibility: Refers to the degree to which the surface of the ground can be observed. This may be influenced by natural processes such as wind erosion or the character of the native vegetation, and by land use practices, such as ploughing or grading. It is generally expressed in terms of the percentage of the ground surface visible for an observer on foot.

1.0 INTRODUCTION

1.1 Project brief

Artefact Heritage and Environment (Artefact Heritage) have been engaged by Creative Vision on behalf of the Bradfield Corporation Pty Ltd (the Applicant) to prepare an Aboriginal Cultural Heritage Assessment Report (ACHAR) for the development proposal at 135 Badgerys Creek Road, Bradfield (Lot 7 DP 243457) (the study area). The study area is within the boundaries of the Gandangara Local Aboriginal Land Council (LALC) and within the Western Sydney Aerotropolis Precinct. The development proposal would include the construction of a Mixed-Use development (which is generally compliant with the Aerotropolis Precinct Plan), as detailed in Section 7.0.

This ACHAR has been prepared by Artefact Heritage for the development proposal at the study area which has been declared State Significant Development (SSD–77458970) under the *Environmental Planning and Assessment Act 1979* (EP&A Act). Item 19 of the Secretary’s Environmental Assessment Requirements (SEARs) issued on 30 January 2025 outline that Aboriginal Cultural Heritage assessment would be required to inform the Environmental Impact Statement (EIS) for the development proposal.

This ACHAR was informed by the Archaeological Technical Report (ATR) previously prepared by Artefact Heritage, which is contained within Appendix A of this report (Appendix A – Technical Report). The ATR identified that a Potential Archaeological Deposit (PAD) was present across the entire study area and that potential subsurface Aboriginal objects would be impacted by the development proposal. As a result, an Aboriginal test excavation program was conducted across the site. The test excavation program recovered Aboriginal objects and a new site was identified as 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018). This site would be directly and totally impacted by the proposed development, as noted in the Archaeological Test Excavation Report (ATER) (Artefact Heritage, 2025d).

This ACHAR has been prepared for SSD Conditions of Consent required to harm the identified site 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018). The ACHAR has also been prepared to assess the socio-cultural, historical, and aesthetic value of the identified site.

1.2 Description of the study area

The study area is located at 135 Badgerys Creek Road, Bradfield (Lot 7 DP 243457) within the suburb of Bradfield, NSW (Figure 1). The study area is within the Liverpool Local Government Area (LGA) and the Parish of Bringelly, within the County of Cumberland. The study area is approximately 2.02 hectares of semi-rural land and is located approximately 250 m to the future Bradfield Metro Station and 4 km to the Western Sydney Airport. The study area is within the boundaries of the Gandangara Local Aboriginal Land Council (LALC) and is within Darug Country.

The study area shares a western frontage with Badgerys Creek Road. The eastern boundary of the site adjoins the State government-led Bradfield City Centre which is set to be a vibrant 24/7 global city, driving advancements in industry and will support 10,000 more homes and 20,000 new jobs in Western Sydney.

As defined by the Aerotropolis Precinct Plan, the study area is located within the Aerotropolis Core Precinct which is envisioned as an attractive place for workers, residents and visitors. The Aerotropolis Core Precinct will leverage the positive economic impact of the adjacent Western Sydney Airport and Bradfield City Centre. It will attract business hubs, research and development,

professional services and creative industries in addition to providing residential development within walking distance of the Bradfield Metro station and proximity to blue and green infrastructure.

1.3 Aims and objectives

This ACHAR aims to identify and assess the Aboriginal heritage values of the study area and consult with Aboriginal stakeholders and the results of the archaeological investigations undertaken. This report will be included in the Environmental Impact Statement (EIS) and used to inform the SSD application for the project.

The objectives of this report are to:

- Identify any Aboriginal cultural values in and around the study area
- Assess these cultural values, as related to the study area, through consultation with Aboriginal stakeholders
- Assess the impacts the proposed construction might have on Aboriginal cultural heritage and the potential archaeological resources within the study area
- Document the process and outcomes of Aboriginal stakeholder consultation
- Provide a plain English summary of the results of the ATR to the Registered Aboriginal Parties (RAPs).

1.4 Statutory framework

This ACHAR has been prepared by Artefact Heritage for the development proposal at the study area which has been declared State Significant Development (SSD–77458970) under the EP&A Act. The SEARs issued on 30 January 2025 outline that an ACHAR would be required to inform the EIS for the development proposal. This report has been prepared to meet the ACHAR requirement of Item 19 of the project SEARs:¹

Table 1: Item 19 of the project SEARs

SEAR	Documentation	Response / Location in Report
<p>19. Aboriginal Cultural Heritage</p> <ul style="list-style-type: none"> • Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts on any Aboriginal cultural heritage values on the land • The ACHAR must be prepared in accordance with the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH, 2011) and the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW, 2010), including results of thorough archaeological survey and test excavations (where required) 	<ul style="list-style-type: none"> • Aboriginal Cultural Heritage Assessment Report 	<p>This Aboriginal Cultural Heritage Assessment Report was prepared to support the ACHAR requirement of Item 19 of the Secretary's Environmental Assessment Requirements.</p> <p>A Cultural Masterplan has been prepared by JMP to address The</p>

¹ NSW Government, Planning Secretary's Environmental Assessment Requirements, Application number: SSD-77458970, Project name: 135 Badgerys Creek Road, Bradfield (Lot 7 in DP 243457).

-
- Include evidence of adequate and continuous consultation with Aboriginal stakeholders in determining and assessing impacts, developing and selecting options for avoidance of Aboriginal cultural heritage and mitigation measures (including the final proposed measures), having regard to the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW, 2010)
 - Include evidence that the requirements of The Recognise Country: Guidelines for development in the Aerotropolis have been met.
- Recognise Country requirements.
-

This ACHAR has been prepared to address this requirement of the SEARs, and the following guidelines:

- *Code of Practice for Archaeological Investigations of Aboriginal Objects in New South Wales*²; hereafter the Code of Practice
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*³; hereafter the Guide
- *Aboriginal cultural heritage consultation requirements for proponents 2010*⁴; hereafter the Consultation Requirements.

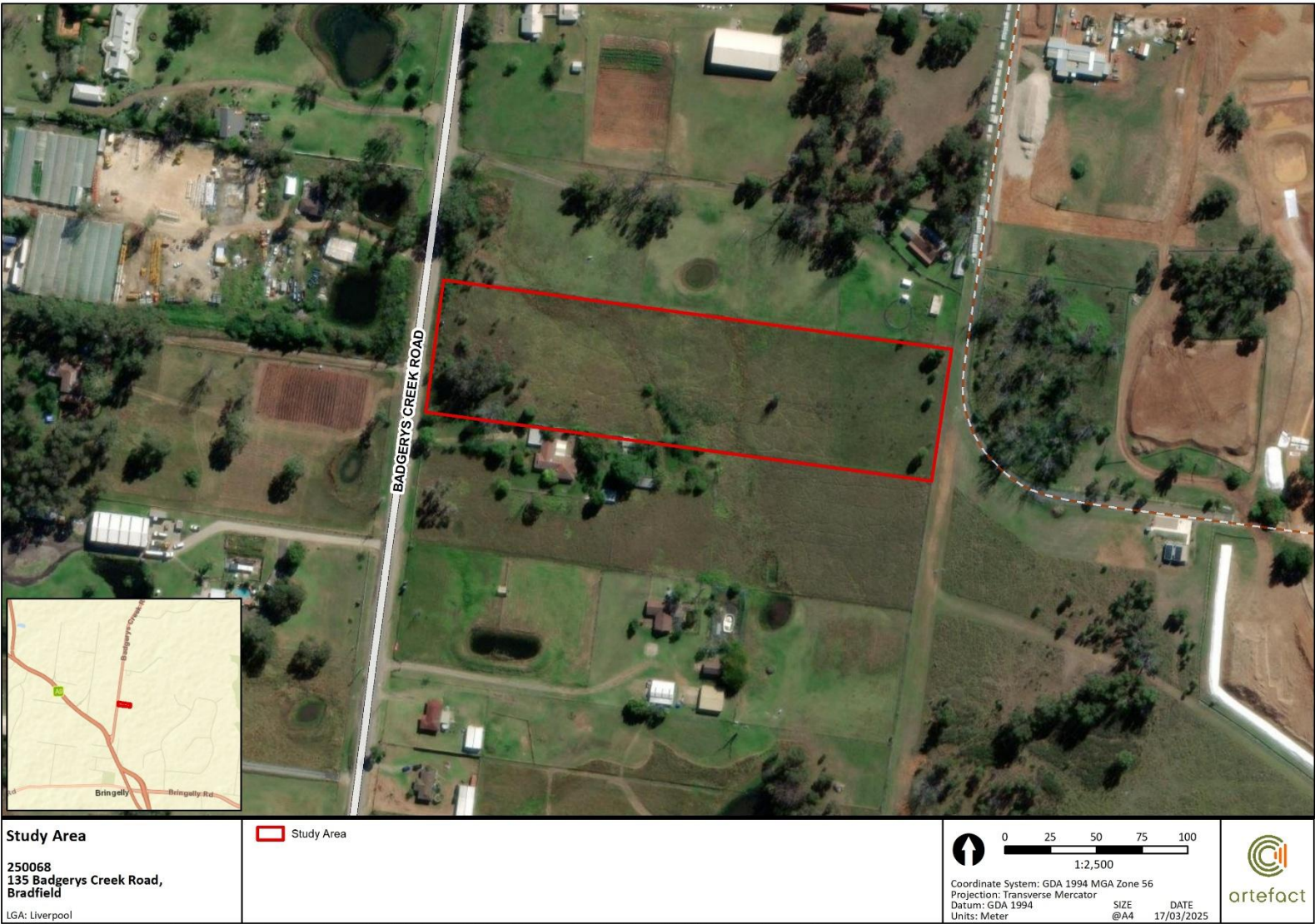
The full legislative context for this assessment can be found in the ATR prepared alongside this report, which is contained within Appendix A of this report (Appendix A – Technical Report). The full results of the Aboriginal test excavation program can be found in the ATER (Artefact Heritage, 2025d).

² Department of Environment, Climate Change & Water, 'Code of Practice for Archaeological Investigations of Aboriginal Objects in New South Wales', 2010b.

³ OEH, 'Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW', 2011.

⁴ Department of Environment, Climate Change & Water, 'Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010', 2010.

Figure 1: Location of the study area



2.0 SUMMARY OF CONSULTATION

Consultation for this project has been undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a). A summary of the consultation for this project has been provided below. The full consultation records for this project are included in Appendix D (Consultation Log and Records).

2.1 Stage 1

2.1.1 Agency letters

In accordance with Section 4.1.2 of the Consultation Requirements, Artefact Heritage corresponded with the following organisations by email on 17 March 2025 requesting the details of Aboriginal people who may hold cultural knowledge relevant to determining the Aboriginal significance of Aboriginal objects and/or places within the local area:

- Heritage NSW
- Native Title Service Corporation (NTSCorp)
- National Native Title Tribunal
- Office of the Registrar, Aboriginal Land Rights Act 1983
- Liverpool City Council
- Gandangara Local Aboriginal Land Council
- Greater Sydney Local Land Services

Responses were requested by 2 April 2025.

2.1.2 Advertisement

In Accordance with Step 4.1.3 of the Consultation Requirements, an advertisement was placed online in the Daily Telegraph Classifieds Public Notice section in www.buysearchsell.com.au for publication on 18 March 2025. The publication invited the participation of Aboriginal people and organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places within the local area, requesting their response by 7 April 2025.

2.1.3 Registration of Aboriginal parties

In accordance with Section 4.1.3 of the Consultation Requirements, invitations to register an interest in the project were sent by email on 3 April 2025 to all Aboriginal people and organisations identified through responses from agencies contacted as part of Stage 1. The emails provided details about the location and nature of the proposal and an invitation to register as an Aboriginal stakeholder. The registrations of interest for the project were requested by 17 April 2025.

A total of 18 groups were registered for the project. Two RAP groups requested their details not be disclosed. The list of RAPs is provided in Table 2.

Table 2: List of registered stakeholders

Group	Name
Gandangara LALC	Dr Melissa Williams
Didge Ngunawal Clan	Lilly Carroll
Barraby Cultural Services	Lee Field
Yurraandaali	Bo Field
	Thomas Dahlstrom
Mundawari Heritage Consultants	Dean Delponte
Konanggo Aboriginal Cultural Heritage Services	Robert Young
Murra Bidgee Mullangari Aboriginal Corporation	Darleen Johnson
Long Gully Cultural Services	Ethan Trewlynn
A1 Indigenous Services	Carolyn Hickey
Turtle Dreaming	Aunty Lynette Hartley
Group name withheld	Name withheld
Kamilaroi Yankuntjatjara Working Group	Phil Khan
Group name withheld	Name withheld
Dharug Custodian Aboriginal Corporation	Justine Coplin
Ginninderra Aboriginal Corporation	Krystle Carroll-Elliott
Guntawang Aboriginal Resources Incorporated	Wendy Morgan
Yulay Cultural Services	Arika Jalomaki

2.2 Stage 2

Stage 2 of the Consultation Requirements is to provide information regarding the scope of the proposed project and the proposed cultural heritage assessment process. To satisfy Stage 2 and Stage 3 of the Consultation Requirements, an ACHAR methodology was prepared that included relevant information and the details are outlined in Section 2.3.

2.3 Stage 3

2.3.1 ACHAR assessment methodology

A copy of the proposed ACHAR assessment methodology was sent to the RAPs by email on 17 April 2025, requesting feedback by close of business on 15 May 2025. The draft assessment methodology presented information about the project and invited feedback on the cultural significance of the area. A summary of the comments received by Artefact Heritage is presented in Table 3.

Table 3: Summary of Aboriginal stakeholder comments on the ACHAR assessment methodology

Person / RAP group	Comment	Response
Ethan Trewlynn (Long Gully Cultural Services)	Agreed with the methodology	Noted in consultation log and report
Lilly Carroll and Paul Boyd (Didge Ngunawal Clan)	Agreed with the methodology	Noted in consultation log and report
Aunty Lynette Hartley (Turtle Dreaming)	<p>Commented that the role of Gandangara LALC does not “speak for or override the Traditional Custodians – that of the Dharug People”</p> <p>Stated that the introduction and reference to the study area should include that it is on Dharug land and outlined Dharug land boundaries.</p> <p>Asked the following:</p> <ul style="list-style-type: none"> • If Gandangara LALC or Artefact would be taking possession/care of artefacts recovered during test excavation • If Dharug people would have access to artefacts recovered following the test excavation program • If artefacts would be returned to site with involvement of Dharug Elders 	<p>Thanked for feedback and provided email response outlining that Aunty Lynette Hartley’s comments were incorporated into the ACHAR.</p> <p>Outlined that specific methodology for the storage or reburial of retrieved artefacts was to be developed later during the corresponding stage in the consultation process.</p>
Dean Delponte (Mundawari Heritage Consultants)	Agreed with the methodology and encouraged continuing consultation with RAPs regarding surveys and test excavation	Noted in consultation log and report
Carolyn Hickey (A1 Indigenous Services)	Agreed with the methodology	Noted in consultation log and report
Darleen Johnson (Murra Bidgee Mullangari Aboriginal Corporation)	Agreed with the methodology	Noted in consultation log and report
Wendy Morgan (Guntawang Aboriginal Resources Incorporated)	Agreed with the methodology	Noted in consultation log and report
Arika Jalomaki (Yulay Cultural Services)	Agreed with the methodology	Noted in consultation log and report
Phil Khan (Kamilaroi Yankuntjatjara Working Group)	Agreed with the methodology, supporting further investigations of the study area, and noted that the	Noted in consultation log and report

Person / RAP group	Comment	Response
	study area is highly significant to his people.	

2.3.2 Archaeological Test Excavation Methodology

A copy of the proposed archaeological Test Excavation Methodology (TEM) was sent to the RAPs by email on 12 June 2025, requesting feedback by close of business on 10 July 2025. The draft excavation methodology presented information about the proposed fieldwork and invited feedback prior to the finalisation of the TEM. The ATR and preliminary ACHAR were also sent to the RAPs to provide background information on the project. A summary of the comments received by Artefact Heritage is presented in Table 4.

Table 4: Summary of Aboriginal stakeholder comments on the Test Excavation Methodology

Person/ RAP group	Comment	Response
Justine Coplin (Dharug Custodian Aboriginal Corporation)	<ul style="list-style-type: none"> • Acknowledgements: Recommends acknowledgement of Traditional Custodians of the study area in project correspondence • Reburial: Would like to have artefacts reburied on Country within the study area wrapped in paperbark. Requested reburial hole to be machine excavated to between 60cm to 1m in depth • Testing locations: Recommends pits no more than 20 metres apart and moved if needed • Sieving: Recommends 3mm sieving of excavation material • Site officers: Recommends that workers should be able to identify artefacts and be fit to work • Reporting: Recommends that reports should be sent to Traditional Custodians upon completion. 	Methodology comments including recommendation for reburial noted in consultation log and test excavation methodology
Darleen Johnson (Murra Bidgee Mullangari Aboriginal Corporation)	Supports recommendations.	Noted in consultation log and test excavation methodology
Carolyn Hickey (A1 Indigenous Services)	Supports recommendations.	Noted in consultation log and test excavation methodology
Dean Delponte (Mundawari Heritage Consultants)	<ul style="list-style-type: none"> • Agreed that the test excavation methodology is appropriate for the site and conditions. Noted that “culturally sterile deposit” reporting terminology can be inappropriate in the context of Aboriginal heritage and recommended alternatives such as: <ul style="list-style-type: none"> ▪ “archaeological sterile deposits” ▪ “culturally unmodified soils” ▪ “no cultural material observed”. 	Test excavation methodology and Aboriginal archaeology project reports modified to incorporate recommended alternative phrasing

Person/ RAP group	Comment	Response
Arika Jalomaki (Yulay Cultural Services)	Supports methodology.	Noted in consultation log and test excavation methodology
Thomas Dahlstrom	No objections to methodology.	Noted in consultation log and test excavation methodology
Phil Khan (Kamilaroi Yankuntjatjara Working Group)	Supports further investigation of study area via test excavation and noted the highly significant and sensitive nature of the study area.	Noted in consultation log and test excavation methodology
Bo Field (Yurrandaali)	No objections to methodology.	Noted in consultation log and test excavation methodology
Wendy Morgan (Guntawang Aboriginal Resources Incorporated)	Supports methodology and recommends reburial of any artefacts in a location away from future construction.	Recommendation for reburial noted as part of the test excavation methodology

2.4 Stage 4

A copy of the draft ATER and draft ACHAR were sent to the RAPs by email on 18 August 2025, requesting feedback by close of business on 15 September 2025. A summary of comments received by Artefact Heritage is provided in Table 5.

Table 5: Summary of Aboriginal stakeholder comments on the draft ACHAR and ATER

Person/ RAP group	Comment	Response
Justine Coplin (Dharug Custodian Aboriginal Corporation)	Commented that the Dharug are the Traditional Custodians of the project area and that this had not been acknowledged in the reports despite work associated with the project profiting off Dharug land. Requested further discussion as to why this had not yet been included.	Artefact Heritage acknowledged that the work associated with the project were profiting off Dharug land and that the acknowledgement of the Traditional Custodians should be more prevalent across the reporting. To address this matter, Darug Country has been acknowledged in Section 1.2 of this report and in the ATR, and ATER. Artefact Heritage requested to call Justine Coplin to discuss the matter further but no response was received.

Person/ RAP group	Comment	Response
Dean Delponte (Mundawari Heritage Consultants)	Commented that the continuing cultural value of the study area extends beyond the scientific value of the recovered assemblage. Noted that the Bradfield landscape retains importance as part of a broader cultural network linked by watercourses, movement pathways and ancestral use. Stated that it was apparent in his review of the documents that Dharug representatives continue to view the local area as Dharug Country and themselves as the Traditional Custodians of the area.	Thanked Dean for his work throughout this project and provided the following response. Artefact Heritage has updated Section 1.2 of this report, the ATR, and the ATER to acknowledge that this land is Darug Country.
	Commented on the strong preference among RAPs for reburial within an undisturbed portion of the study area, viewing the act as cultural obligation and long-term care which enables continual connection to the land. Supported the value of consultation with RAPs as maintaining cultural integrity.	The report notes that there is a strong connection to this land despite the low levels of artefactual material recovered throughout the excavation.
	Recommended the following: <ul style="list-style-type: none"> • Frame reburial clearly as a cultural obligation rather than a procedural measure • Strengthen the heritage induction and UFP to include images of typical stone artefacts, toolbox refreshers during works, and clear stop-work protocols. • Note that any changes to the footprint or new discoveries should trigger renewed consultation with RAPs. 	The reburial process will take place in an area that will remain undisturbed in perpetuity, as requested. It has also been acknowledged as a cultural obligation.
Thomas Dahlstrom	No objections to ATER and ACHAR.	Noted in consultation log and report.
Darleen Johnson (Murra Bidgee Mullangari Aboriginal Corporation)	Supports ATER and ACHAR.	Noted in consultation log and report.
Wendy Morgan (Guntawang Aboriginal Resources Incorporated)	Supports ATER and ACHAR.	Noted in consultation log and report.
Phil Khan (Kamilaroi Yankuntjatjara Working Group)	Supports ATER and ACHAR and recommends reburial of artefacts recovered during test excavation.	Noted in consultation log and report.

3.0 SUMMARY AND ANALYSIS OF BACKGROUND INFORMATION

3.1 AHIMS search

NOTE: The location of Aboriginal sites is considered culturally sensitive information. It is advised that this information, including the AHIMS data appearing on mapping below must be removed from this report if it is to enter the public domain.

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) was undertaken on 28 April 2025 (Client Service ID: [REDACTED]) to determine the location of Aboriginal sites in relation to the current study area. The search area was defined as the study area and include approximately 5 km x 5 km of land surrounding the study area to inform the characterisation of the local archaeological context. The AHIMS search parameters were as follows:

GDA, Zone 56	[REDACTED] m E
	[REDACTED] m N
Buffer	0 m
Number of sites	100

The extensive AHIMS search identified that 100 AHIMS sites were present within the search area (Figure 2), although no sites were present within the study area. Further examination of the AHIMS data identified that four sites had been listed as 'Not a Site' meaning that they have been excluded from this discussion and that there are a total of 96 AHIMS sites relevant to this assessment. The closest AHIMS site, AHIMS ID 45-5-5956, is located approximately 100 m south of the study area (Figure 3).

The majority of AHIMS sites identified within the search area were 'Artefact' sites consisting of isolated stone artefacts or scatters of artefacts. The AHIMS sites within the search area are largely concentrated around major watercourses within the area, particularly Wianamatta-South Creek, Thompsons Creek and Badgerys Creek, reflecting broader models of Aboriginal site distribution from across the Cumberland Plain.⁵ Additionally, the majority of AHIMS sites within this region have been identified in less disturbed areas of this region that have seemingly been used for mostly agricultural purposes. This lack of significant disturbance suggests a higher potential for Aboriginal objects to be present on or beneath ground surfaces.

Aboriginal settlement would have covered the whole of the landscape, although surviving archaeological evidence on the Cumberland Plain indicates a correlation between the number of recorded Aboriginal sites and close proximity to higher order watercourses. Certain site types, such as culturally modified trees, are particularly vulnerable to destruction through historical occupation. As a result, more resilient site types, such as stone artefacts, are predominant in the archaeological record. Because of this, the nature and location of registered Aboriginal sites is an imperfect reflection of past Aboriginal occupation. Furthermore, the surviving archaeological record is also a reflection not only of historical land-use, disturbance, and the post-depositional events, but also reflects the sampling bias of previous archaeological investigation.

⁵ Beth White and Jo McDonald, 'Lithic Artefact Distribution in the Rouse Hill Development Area, Cumberland Plain, New South Wales', *Australian Archaeology*, no. 70 (2010): 29–38.

Figure 2: Extensive AHIMS search results

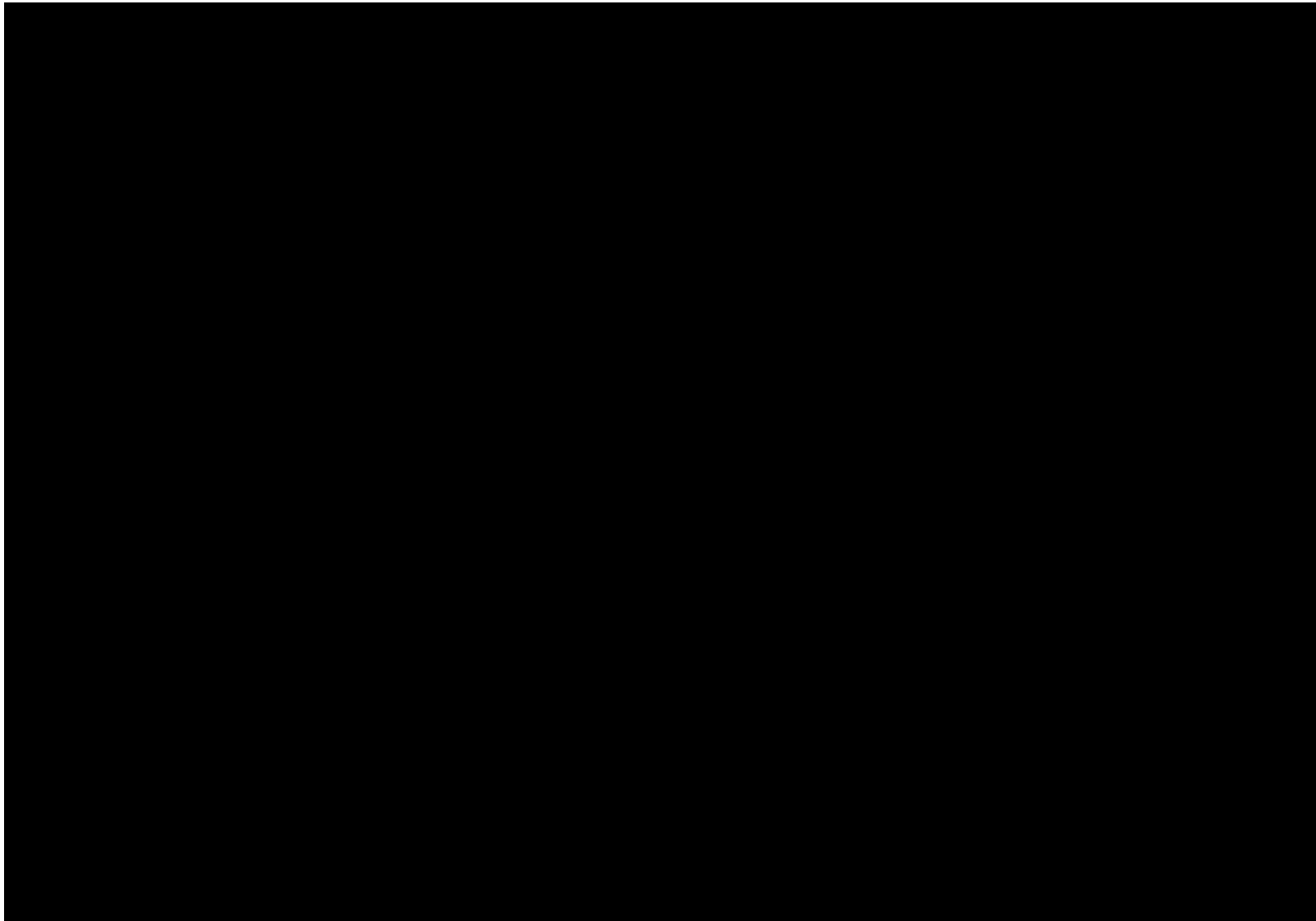
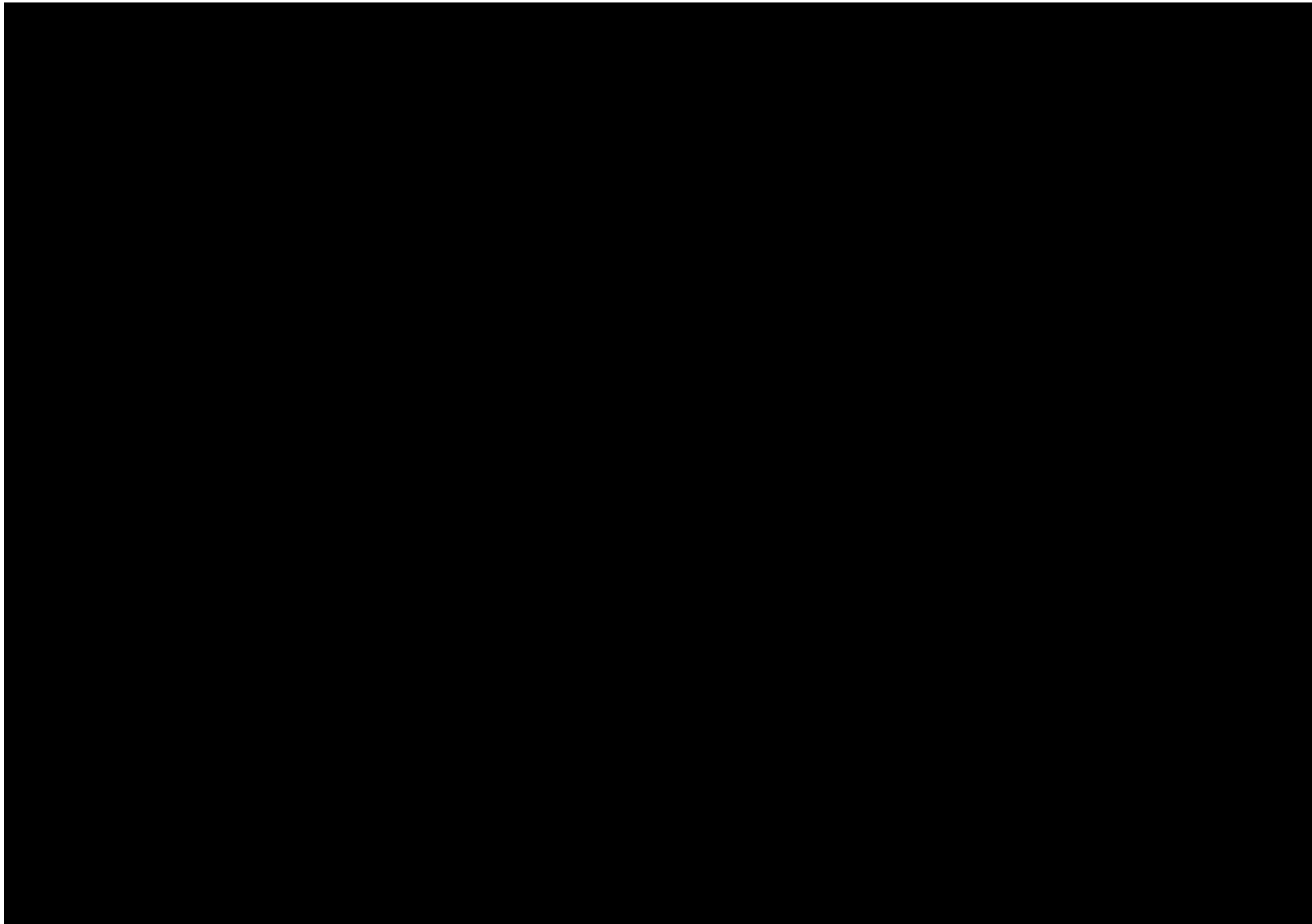


Figure 3: Detailed AHIMS search results



3.2 Archaeological background

Numerous archaeological studies have been conducted in the region around the study area including Badgerys Creek and Bradfield. The results of a selection of these reports have been summarised below in Table 6.

Table 6: Previous archaeological studies in the vicinity of the study area

Report	Summary
<p>Smith 1989. Liverpool Release Areas: Archaeological site survey and planning study</p>	<p>The Liverpool Release Area study covered an area of approximately 2,700 hectares, including Hoxton Park, Cecil Park, West Hoxton, Casula, and Edmondson Park. At its closest point, the area assessed is located approximately nine kilometres east of the present study area.</p> <p>The report identified a spatial correlation between site location and the availability of water. Creek flats and creek banks were found to contain the highest density of sites in the area assessed and were deemed to be of high archaeological potential. Ephemeral creeks were assessed to be of moderate archaeological potential and hill tops and slopes were assessed as demonstrating low potential.</p>
<p>ENSR/ AECOM 2009. Archaeological investigations at the Oran Park and Turner Road Precincts</p>	<p>Archaeological excavations were undertaken at the Oran Park and Turner Road Precincts, which are located approximately eight kilometres south of the present study area. Three hundred and forty test pits were excavated across a variety of landform units, and a total of 4780 artefacts were recovered from Phase 1 and Phase 2 excavations, with around three quarters of the artefacts made of silcrete. Approximately five per cent of the assemblage consisted of tools or cores, including backed artefacts and scrapers.</p> <p>The results of the excavations indicated a low density spread of archaeological material across the precinct. They also suggest that Aboriginal artefact clusters were likely to occur in a continuous low-density scatter up to 300 metres from major watercourses, and 120 m from second order streams.</p>
<p>White and McDonald 2010. Lithic Distribution in the Rouse Hill Development Area, Cumberland Plain, New South Wales</p>	<p>Beth White and Jo McDonald prepared a discussion of the nature of Aboriginal site distribution as interpreted through lithic analysis of excavated sites in the Rouse Hill Development Area (RHDA). The major findings of the assessment were that artefact densities were most likely to be greatest on terraces and lower slopes within 100m of water. Specifically, it was found that artefacts were most likely to be located within 50-100 metres of higher (4th) order streams, within 50 metres of second order streams, and that artefact distribution around first order streams was not significantly affected by distance from the watercourse.</p> <p>Although the RHDA is located approximately 32 kilometres northeast of the present study area, the stream order model can be transferred to other areas of the Cumberland Plain, especially those on shale soil geology (such as the study area), as landscape, soils and artefacts patterning are similar throughout the region.</p>
<p>Artefact Heritage 2013. Boral Bringelly Brickworks: Cultural Heritage Assessment Report</p>	<p>In 2013, Artefact prepared a Cultural Heritage Assessment Report at the Bringelly Brickworks site, located approximately 2.3 km southwest of the study area. This report includes results of an archaeological survey and test excavation. The archaeological survey identified artefact scatters, and isolated artefacts, in addition to one area of Potential Archaeological Deposit (PAD). One site was identified as being in a disturbed context, and no longer in a primary context. Two additional sites were located on steep slope landforms and concluded as being in secondary contexts due to slope wash processes. An isolated artefact and PAD were located in an area of relatively minimal disturbance, and in association with a crest landform. Test excavation of the PAD revealed a low-density</p>

Report	Summary
	<p>artefact scatter and found to be consistent with other regional and local site types within the Cumberland Plain.</p>
<p>Kelleher Nightingale Consultants (KNC) 2017. The Northern Road Upgrade Mersey Road, Bringelly to Glenmore Parkway, Glenmore Park: Aboriginal Cultural Heritage Assessment Report</p>	<p>In 2017, KNC prepared an ACHAR for 16km of road upgrades to the Northern Road between Mersey Road, Bringelly and Glenmore Parkway, Glenmore Park, primarily located to the northwest of the study area. Aboriginal Archaeological assessment identified 28 archaeological sites within the study area, comprising 23 artefact scatters and 5 isolated artefacts. 20 Aboriginal archaeological sites are identified as having moderate significance, while the remaining sites contained disturbed or low value deposits. All sites exhibited moderate to low artefact densities, and were interpreted as relating to transitory, or transitional activities. It is stated these sites had formed part of an Aboriginal cultural highway, where varied activities had taken place in the past. Sites that were identified as being of greater significance provide further information regarding this Aboriginal highway, specifically locations along ridges and meeting spots, like the junction of Elizabeth Drive and The Northern Road.</p>
<p>Artefact Heritage 2019. CSR Advanced Manufacturing Hub</p>	<p>Artefact undertook archaeological survey and text excavation in Badgerys Creek, approximately 4 kilometres north of the current study area. Archaeological survey covered a variety of landform features and identified a correlation between lower levels of historic ground-disturbance and increased archaeological potential. PADs were identified on a variety of slope landform contexts, at distances of up to 450 metres from major watercourses. Test excavations across 77 test pits identified three sub-surface deposits, one of which contained a hearth with clay heat retainers. These sites were interpreted as being part of a larger complex of sites which spanned the study area and its environment.</p>
<p>EMM Consulting 2020. Mamre Road Precinct: Aboriginal Heritage Study</p>	<p>In 2020, EMM Consulting prepared an Aboriginal Heritage Study at the Mamre Road Precinct, approximately 8.5 km north-east of the study area. This report includes desktop and field survey results, which were comparable to other studies within the broader Cumberland Plain. All sites identified within the Mamre Road Precinct were found to be primarily located on the boundaries of main creek systems, and/or on a ridge line, located at the northern study area boundary. One high density artefact scatter was documented on South Creek, however all other sites were characterised as isolated objects and/or low density artefact scatters.</p> <p>Excavations at several sites determined that sites were mostly found in shallow soil profiles, commonly under 300mm deep, with rare examples extending between 600-800mm. Areas of potential were also identified, which included a 200m buffer surrounding Ropes Creek, and 100m buffers surrounding Kemps Creek, South Creek, and second order tributaries. Elevated landforms, including levees and terraces within these buffer zones were considered as having higher potential for Aboriginal cultural material, in addition to several ridgelines, that were identified as having potential.</p>
<p>M2A 2021. Sydney Metro-Western Sydney Airport. Aboriginal Archaeological Report</p>	<p>M2A prepared an Aboriginal archaeological report ahead of the development of a metro railway line which will span a distance of 23 kilometres between St Marys in the north and the Western Sydney Aerotropolis in the south. The project area passes through land approximately 50 metres east of the study area.</p> <p>Concurrent archaeological survey and test excavation were undertaken to determine the archaeological character and cultural heritage significance of the area surveyed and excavated. Test excavation of 196 0.5 by 0.5 metre test pits took place across the Cumberland Plain landscape, with a number of pits excavated in Blacktown soils, which are present at 135 Badgerys Creek Road, Bradfield. Pits were excavated until a culturally sterile depth was reached, often terminating before 300mm.</p>

Report

Summary

Of the 196 test pits excavated, 22 (11.2%) test pits were found to contain Aboriginal objects, with densities ranging from one to five artefacts per test pit. 42 lithic artefacts were recovered in total. Lithic analysis found that 31 artefacts were made of silcrete, six of silicified tuff, three of quartz and one of chert. One core was recovered from excavation, indicating that tool manufacturing took place within the project area.

**Bradfield City
Centre: DRAFT
Aboriginal Cultural
Heritage
Assessment
Report (Extent
Heritage 2022)**

In 2022, Extent prepared a Draft ACHAR for the Bradfield City Centre Masterplan. This report includes results of an archaeological survey and test excavation. Survey Unit 1 comprises the area around the present study area and subsequent test excavation were conducted in an area approximately 170m northeast of the study area (Figure 4), although no Aboriginal objects were identified in this investigated area.

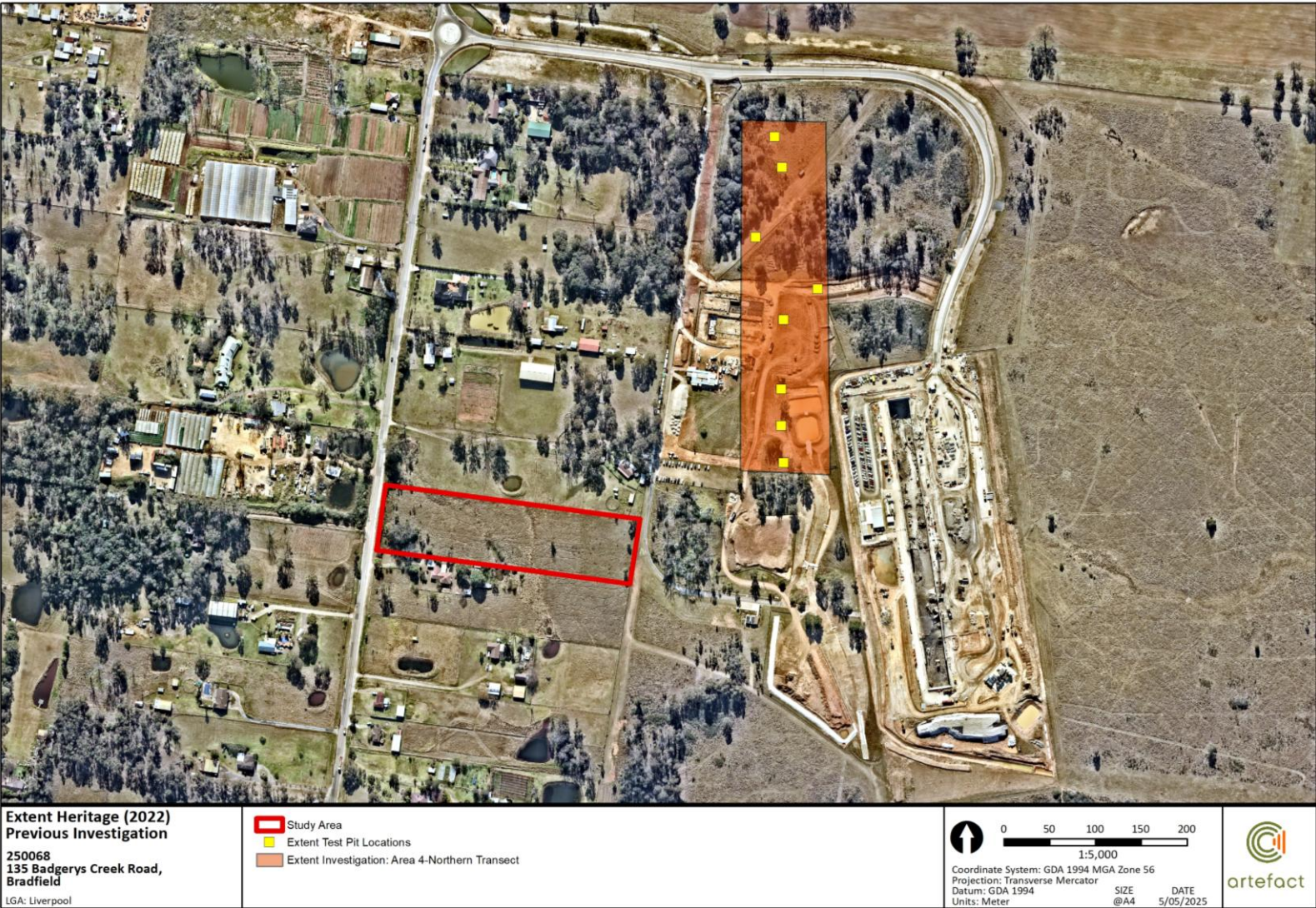
**Artefact Heritage
2024. 60 Kelvin
Park Drive,
Bradfield:
Archaeological
Technical Report**

In 2024, Artefact Heritage completed an Aboriginal ATR for the site located at 60 Kelvin Park Drive, Bradfield, located approximately 1.8 to the east to the northeast of the study area. The assessment identified that although there were no Aboriginal objects identified within the site, an area of archaeological potential was identified within the northern portion of the site. This portion of land was identified as having archaeological potential due to its proximity to Thompsons and South Creek, the apparent low levels of historic disturbance within this portion of the site, and its location identified as being within an area of moderate Aboriginal cultural sensitivity in the WSAPP. As a result, archaeological test excavations were recommended in the northern portion of the site to further understand the nature and extent of potential subsurface archaeological deposits.

**Artefact Heritage
2025. DRAFT 126
Kelvin Park Drive,
Bradfield:
Archaeological
Technical Report**

In 2025, Artefact Heritage completed an Aboriginal ATR for the site located at 126 Kelvin Park Drive, Bradfield. This site is located approximately 1.7 km to the southeast to the study area at 135 Badgerys Creek Road, Bradfield. The assessment identified that although there were no Aboriginal objects identified within the site, two areas of archaeological potential were identified within the northern and eastern portions of the site. These portions of land were identified as having archaeological potential due to their proximity to ephemeral watercourses associated with South Creek, their sloping landforms near the crest, and the apparent low levels of historic disturbance within these portions of the site. As a result, archaeological test excavations were recommended in the northern and eastern portions of the site to further understand the nature and extent of potential subsurface archaeological deposits.

Figure 4: Extent Heritage (2022) test pit locations



3.3 Environmental background

3.3.1 Soils and geology

The study area is situated within the Blacktown soil landscape,⁶ which extends across much of the Cumberland Plain. Blacktown soils are typically shallow, and previous archaeological excavations have generally noted that Aboriginal objects are predominantly found at depths of less than 300mm below ground surfaces. Additionally, the Blacktown soil landscape is underlain by the Bringelly Shale formation. This geology means that grinding grooves and engraved or pigmented art sites are less likely to be present in the Blacktown landscape, as these sites are more commonly found in areas where sandstone outcrops are more frequent.

3.3.2 Hydrology and landforms

The Blacktown soil landscape is typically made up of gently undulating slopes. The study area is located in a mild depression associated with such a slope. Due to the relatively flat, gently inclining topography of the study area, it may have served as a preferable route for Aboriginal groups as they moved across the landscape.

The nearest major watercourse to the study area is Thompsons Creek, which is approximately 830m to the southeast. However, three ephemeral tributaries of the creek are present within the study area. Previous archaeological studies (see Section 3.2 of this report) have noted how distance to permanent and ephemeral watercourses impact the distribution of Aboriginal archaeological sites, and based off this archaeological background it is unlikely that Aboriginal groups used the study area as a major occupation site. Occupation within the study area was likely infrequent and connected to the periodic presence of water within the tributaries present in the study area.

3.3.3 Vegetation

Vegetation within the Blacktown soil landscape is characterised as now almost totally cleared open-forest and open-woodlands of dry sclerophyll forest. Prior to clearing, native woodland and open forests would have been dominated by *Eucalyptus tereticornis* (forest red gum), *E. crebra* (narrow-leaved ironbark), *E. moluccana* (grey box) and *E. maculata* (spotted gum).⁷ Due to the historic and modern land clearing within the study area, it is unlikely that any mature aged trees remain. Therefore, the potential for culturally modified trees to be present within the study area is low.

3.3.4 Historic land disturbance

Prior to the twentieth century, historical records indicate that the study area was likely used for agricultural purposes, like much of the region surrounding it. This usage is unlikely to have resulted in significant disturbance that may have affected any Aboriginal objects present beneath ground surfaces in the study area.

Except for the 1955 aerial image which indicates that a potential drainage area run through the depression in the centre of the study area, 1930s to 2005 historical plans and aerial imagery generally indicates the study area had been cleared but remained undeveloped through the mid-twentieth century to early twenty-first century (Figure 5-Figure 9). Historical plans and aerial image indicate that there has been no significant development within the study area that may have highly disturbed the

⁶ eSpade, 2015, <https://www.environment.nsw.gov.au/eSpade2Webapp/#>.

⁷ eSpade.

ground surfaces, minimising the potential for Aboriginal objects and sites. Objects or sites that may have previously been present in this portion of the study area are likely to present.

Figure 5: 1955 aerial image with the location of the study area outlined in red (Source: Spatial Records Historical Aerial Imagery Viewer)



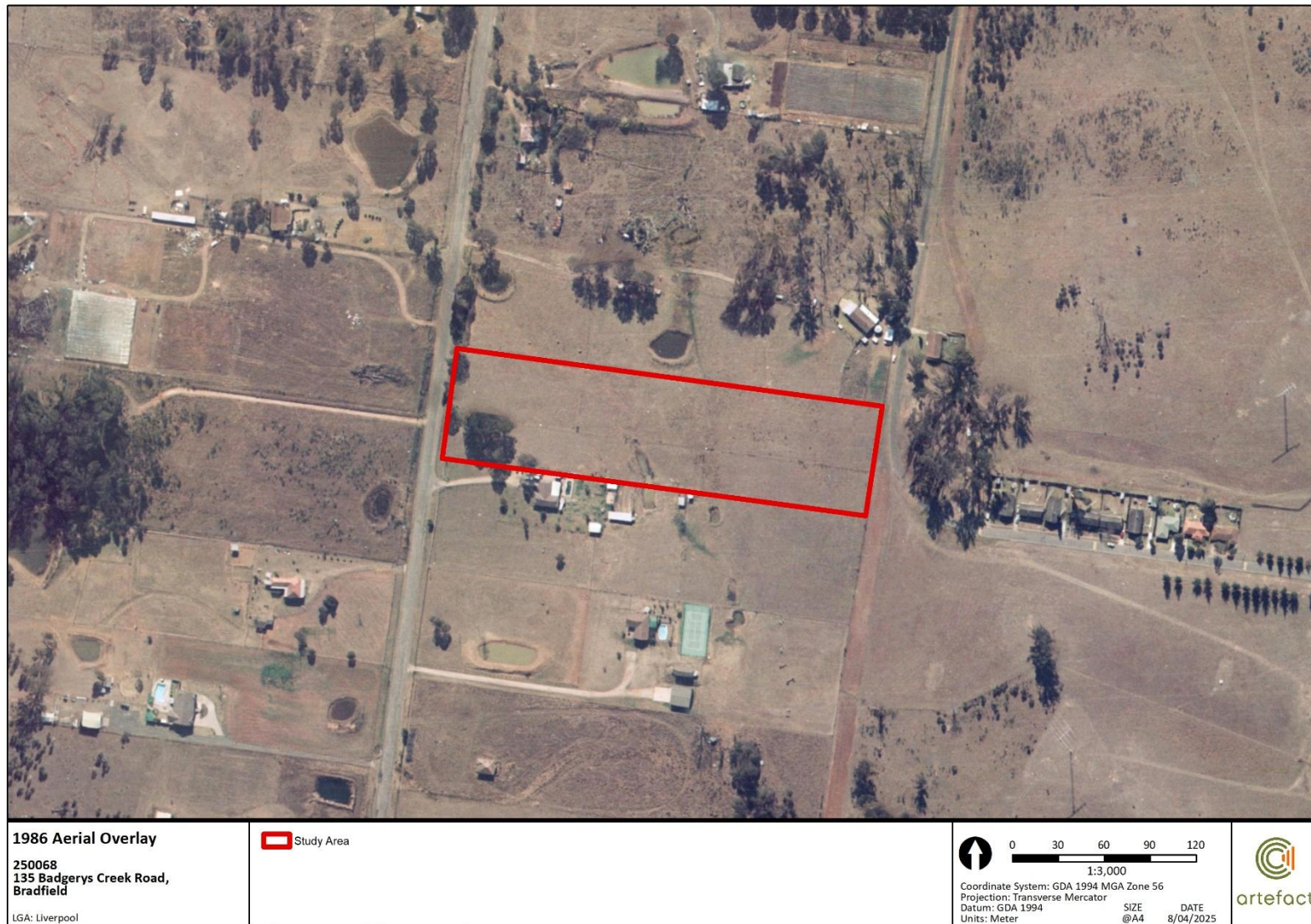
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Figure 6: 1965 aerial image with the location of the study area outlined in red (Source: Spatial Records Historical Aerial Imagery Viewer)



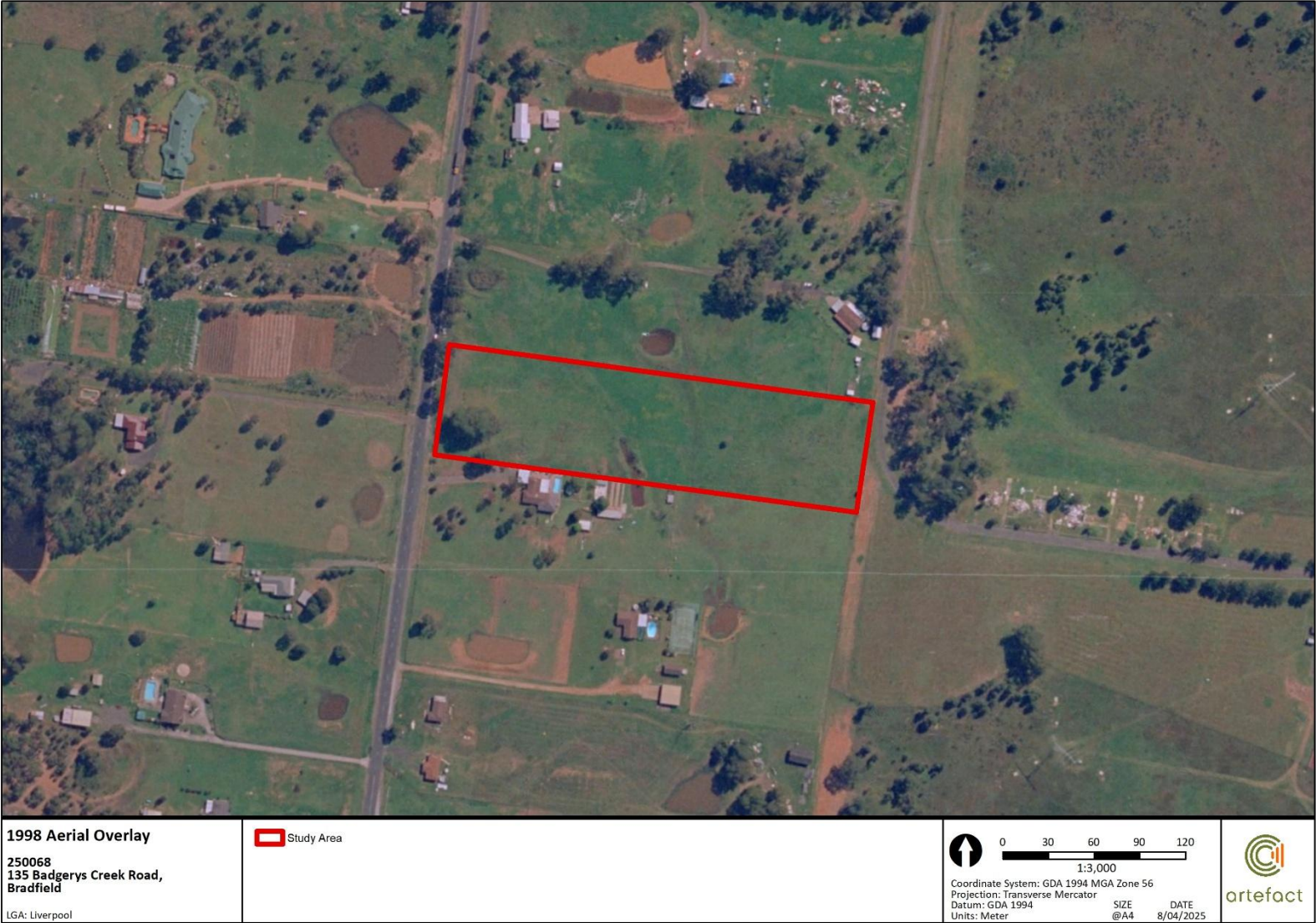
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Figure 7: 1986 aerial image with the location of the study area outlined in red (Source: Spatial Records Historical Aerial Imagery Viewer)



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Figure 8: 1998 aerial image with the location of the study area outlined in red (Source: Spatial Records Historical Aerial Imagery Viewer)



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Figure 9: 2005 aerial image with the location of the study area outlined in red (Source: Spatial Records Historical Aerial Imagery Viewer)



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3.4 Predictive model

The ATR conducted for this assessment and study area contained a predictive model based on the regional and local archaeological character of the study area and its surrounds. The predictive model comprises a series of statements about the nature and distribution of archaeological evidence of Aboriginal land use within the study area. Based on a synthesis of information from the results of desktop research, landscape context and previous archaeological reports surrounding the study area, the following predictive statements can be made:

- Portions of the study area that have been subject to the development of structures and dams are unlikely to possess Aboriginal objects due to the detrimental effects of ground disturbance on Aboriginal objects
- While Aboriginal site distribution within the Cumberland Plain has typically been concentrated around watercourses, previous studies have demonstrated that evidence of Aboriginal land use has been identified across numerous landforms. As such, there is potential for Aboriginal objects to be present within the study area
- Aboriginal objects may be present on or beneath ground surfaces, although given that the study area is situated within the Blacktown soil landscape, subsurface archaeological deposits are only likely to be identified in portions of the site that have been less disturbed by development and landform erosion
- Previous archaeological investigations support the prediction that Aboriginal objects, including isolated stone artefacts or low-density artefact scatters, may be present beneath the ground surface in certain areas, particularly relatively flat and elevated areas in proximity to watercourses including ephemeral first order streams (ENSR/ AECOM, 2009)
- Any Aboriginal objects that are present within the study area are likely to consist of isolated stone artefacts or low-density artefact scatters
- Due to evidence of land clearing within the study area, it is unlikely that culturally modified trees will be present.

4.0 SUMMARY OF FIELD INVESTIGATIONS

4.1 Archaeological survey 29 April 2025

An archaeological survey of the study area was completed on 29 April 2025 by Lily Hackett (Heritage Consultant) and Jonny Love (Senior Heritage Consultant). Representatives from the Gandangarra LALC were also in attendance, including Darren Duncan, Kelly Barton, Jye Brown, and Trinity Paulson-Dixon.

The study area is characterised by a gentle slope from east to west following the natural terrain. This gentle slope reaches a depression in the centre of the study area. No residential development or in-ground utilities associated with water, electrical services or gas were identified. Concreted PVC pipes were located within the northwest portion of the study area, but their purpose was unknown. A depression running across the centre of the study area, as noted in Section 3.3.2 and in Figure 5, suggested that a drainage channel may be present. However, despite this area being dry on the day of the site inspection, no evidence of this drainage line within the depression of the study area was identified and no evidence of ground disturbance was identified.

Surface visibility and ground exposure across the study area was near nil due to coverage from the dense grass and vegetation. Some areas of visibility remained in areas of disturbance around planted and imported trees, although no Aboriginal objects were identified within these locations. There was no observed disturbance across the majority of the study area, suggesting that intact soils may be present. No presence of the ephemeral tributaries mapped as running through the study area were identified.

The sloping landform towards the crest would have provided ideal visibility of the surrounding landscape. This landscape would have also been conducive to travel en-route to subsistence resources provided by the network of ephemeral tributaries within the study area. Although this landform is unlikely to have facilitated permanent habitation, the elevated landform and ephemeral tributaries is likely to have rendered it a suitable location for intermittent use.

During the archaeological survey, the representatives from the Gandangarra LALC noted that the entire study area should be identified as a PAD which would merit test excavations. Based on the observations made by the LALC representatives, landform, proximity to watercourses, and lack of historical disturbance, it was assessed that the entire study area has the potential for Aboriginal archaeological deposits to be present. As such, the study area was identified as 135 Badgerys Creek Road PAD 01 (Figure 22).

4.1.1 Aboriginal sites

An area of PAD was identified during the archaeological survey across the study area based on a lack of visible historic disturbance, a favourable location on a slope (gentle incline) landform, proximity to watercourses, and its location within an area of moderate Aboriginal cultural sensitivity under the WSAPP.

A summary of the archaeological survey results is provided in Table 7 below.

Table 7: Archaeological survey results

Site number	Feature(s)	Survey unit	Landform
135 Badgerys Creek Road PAD 01	PAD	1	Slope (gently inclined)

Figure 10: Overgrown grass following the sloping terrain, view east



Figure 11: Depression within the central landform of the study area, view east



Figure 12: Depression within the central landform of the study area, view west



Figure 13: Overgrown grass following the sloping terrain, view east



Figure 14: Depression within the central landform of the study area, view west



Figure 15: Trimmed grass following the sloping terrain, view south



Figure 16: View of the study area showing the slope gentle slope towards the depression of the landform



Figure 17: Trimmed grass following the sloping terrain, view



Figure 18: View along the eastern portion of the study area showing the imported trees and lack of ground visibility, view south



Figure 19: Ground exposure surrounding tree coverage, view west



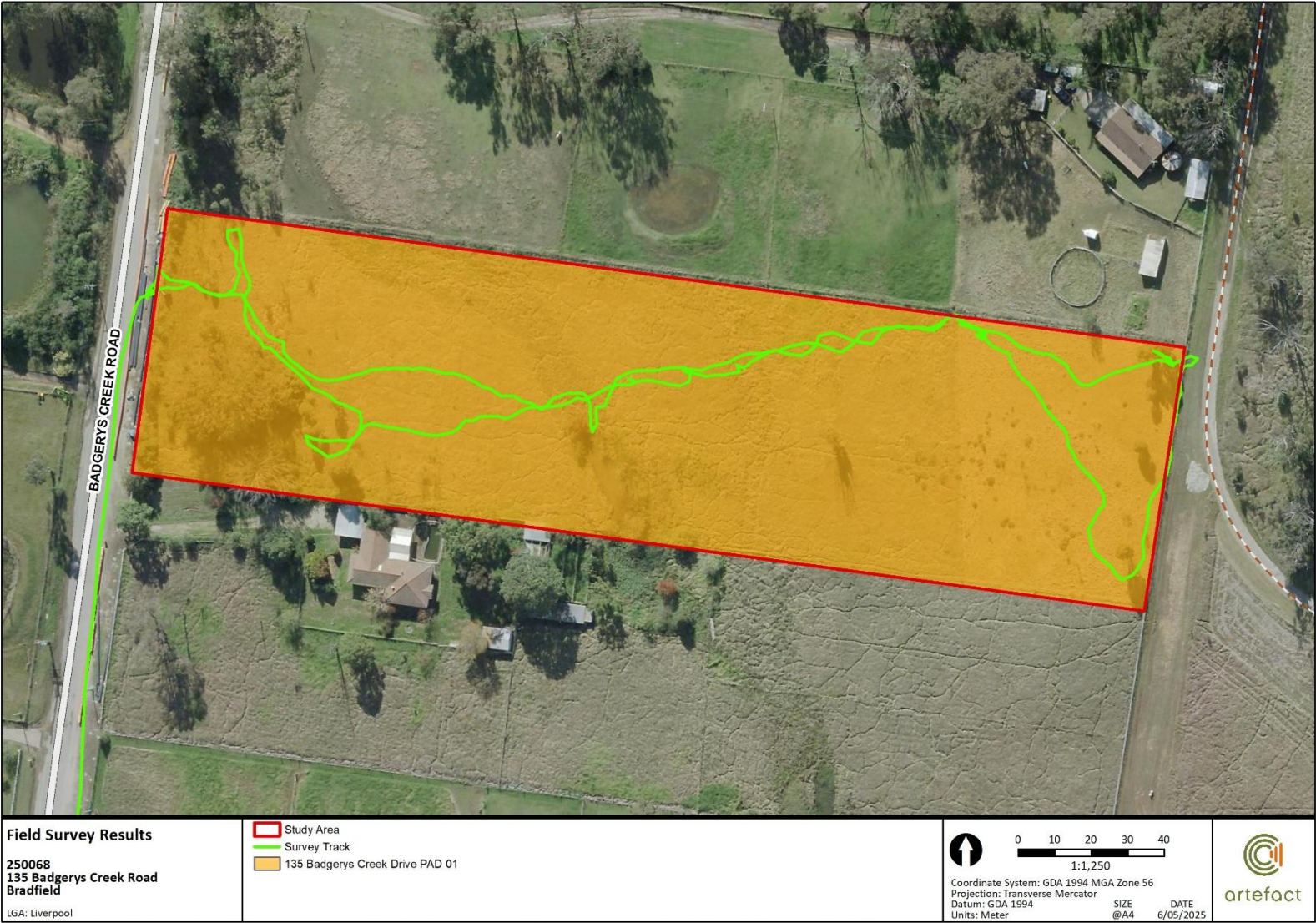
Figure 20: Trimmed grass with lack of ground exposure and scale



Figure 21: Overgrown grass with scale



Figure 22: Location of PAD within the study area and survey tracks



4.2 Test excavations 28 July–1 August 2025

Based on the findings of the ATR and the potential for Aboriginal objects to be present within 135 Badgerys Creek Road PAD 01, test excavation was conducted between 28 July 2025 and 1 August 2025 in accordance with the TEM prepared for this project. The personnel who were involved in the test excavation program are listed in Table 8. A total of 29 test pits were excavated in areas where 135 Badgerys Creek Road PAD 01 would be impacted by the proposed works (Figure 25).

Table 8: Test excavation personnel

Name	Organisation	Role	Dates
Jonny Love	Artefact Heritage	Excavation Supervisor	28 July to 1 August 2025
Lilly Hackett	Artefact Heritage	Archaeologist	28 July to 1 August 2025
Beatrix Ye	Artefact Heritage	Archaeologist	29 July to 1 August 2025
Jonathan Bennett	Artefact Heritage	Archaeologist	29 July to 1 August 2025
Pete Delponte	Mundawari Heritage Consultants	Site Officer	29 July to 1 August 2025
Kurt Brenner	Kamilaroi-Yankuntjatjara Working Group	Site Officer	29 July to 1 August 2025

Test excavations demonstrated that there was variability in the soil profile in tested areas of the PAD, with deeper soils encountered along the creek line depression in the centre of the study area, including the slopes of this depression. Test pits in this area (TP03-TP11, TP18-TP25 and TP29) were generally excavated to depths of 200-300 mm before encountering archaeologically sterile clay. Shallower soils were identified on the mid and upper slopes of the study area (TP01-TP02, TP12-TP14, TP15-TP17 and TP26-TP28), with soils generally excavated to depths of 200 mm or less. Disturbance was observed in the upper 0-200 mm of the soil profile and noted to contain fragments of glass, ceramic and broken garden hose.

A total of 6 Aboriginal objects (stone artefacts) were recovered at the conclusion of test excavation from 5 test pits from the upper 0-200 mm of the soil profile. It was observed that no Aboriginal objects were recovered from the mid to upper slope landform. The recovered assemblage was not interpreted as an intact deposit due to the identification of modern disturbance in soils where Aboriginal objects were recovered. The shallowness of the soils from which the Aboriginal objects were recovered was also interpreted to indicate that rain and creek activity may have redeposited the objects into their excavated locations.

135 Badgerys Creek Road PAD 01 has been revised as 135 Badgerys Creek Road Artefact Scatter 01 following consideration of the results of archaeological test excavation (Figure 26). 135 Badgerys Creek Road Artefact Scatter 01 encompasses areas where artefacts were recovered during test excavation, including a buffer approximately 20 m to the east and west. It is considered likely that Aboriginal objects are present at low densities in the depression present at 135 Badgerys Creek Road in proximity to the non-perennial creek line due to the following reasons:

- Artefacts were identified in the broader creek line depression landform
- Observation that A horizon soils were deeper in this area

- The potential for Aboriginal objects to have moved downslope towards the non-perennial creek line because of erosion and creek activity.

Figure 23: TP01 north section, representative of soil profile in mid and upper slopes of PAD



Figure 24: TP23 north section, representative of soil profile in creek line depression within PAD



Figure 25: Excavated test pit locations

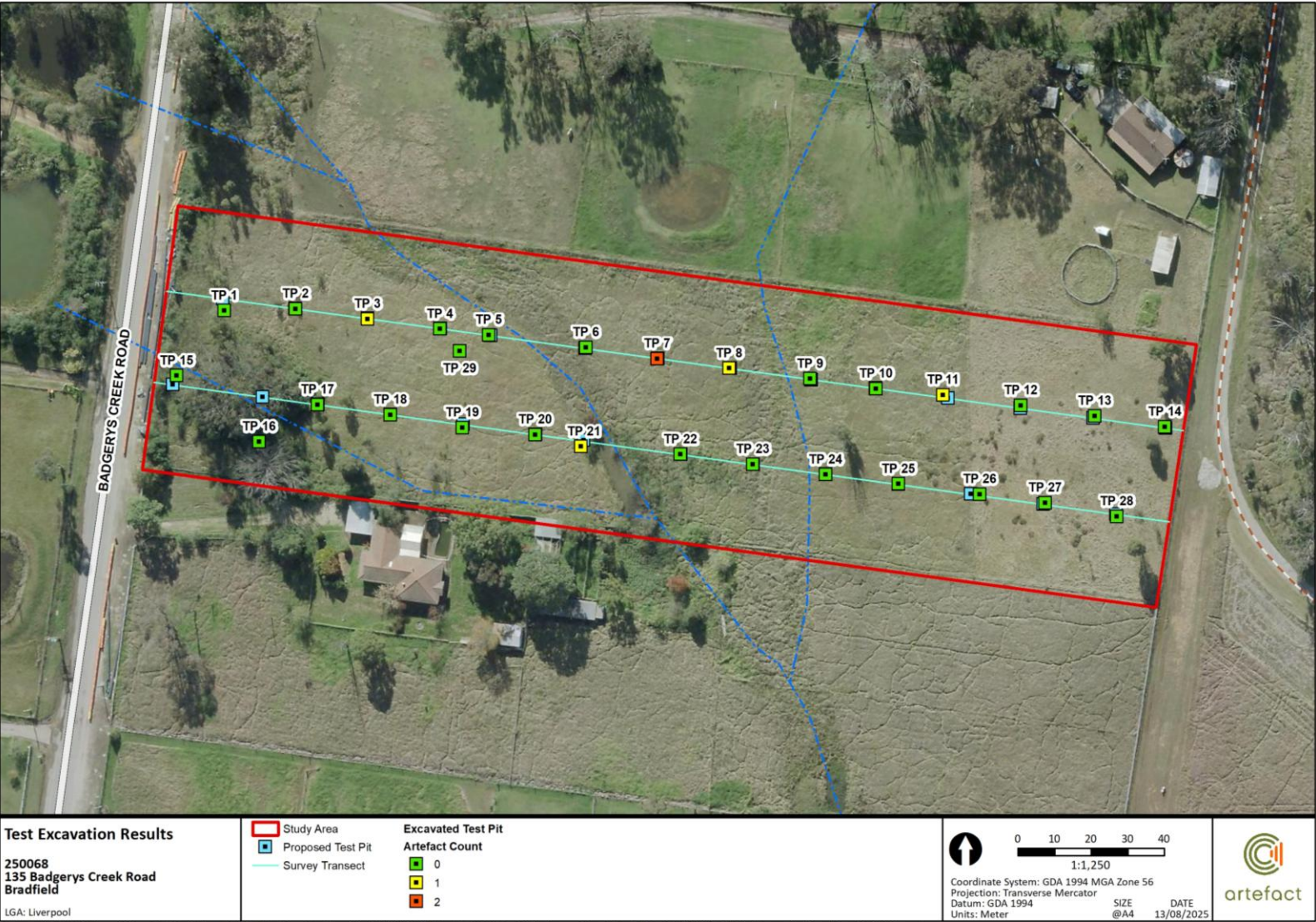
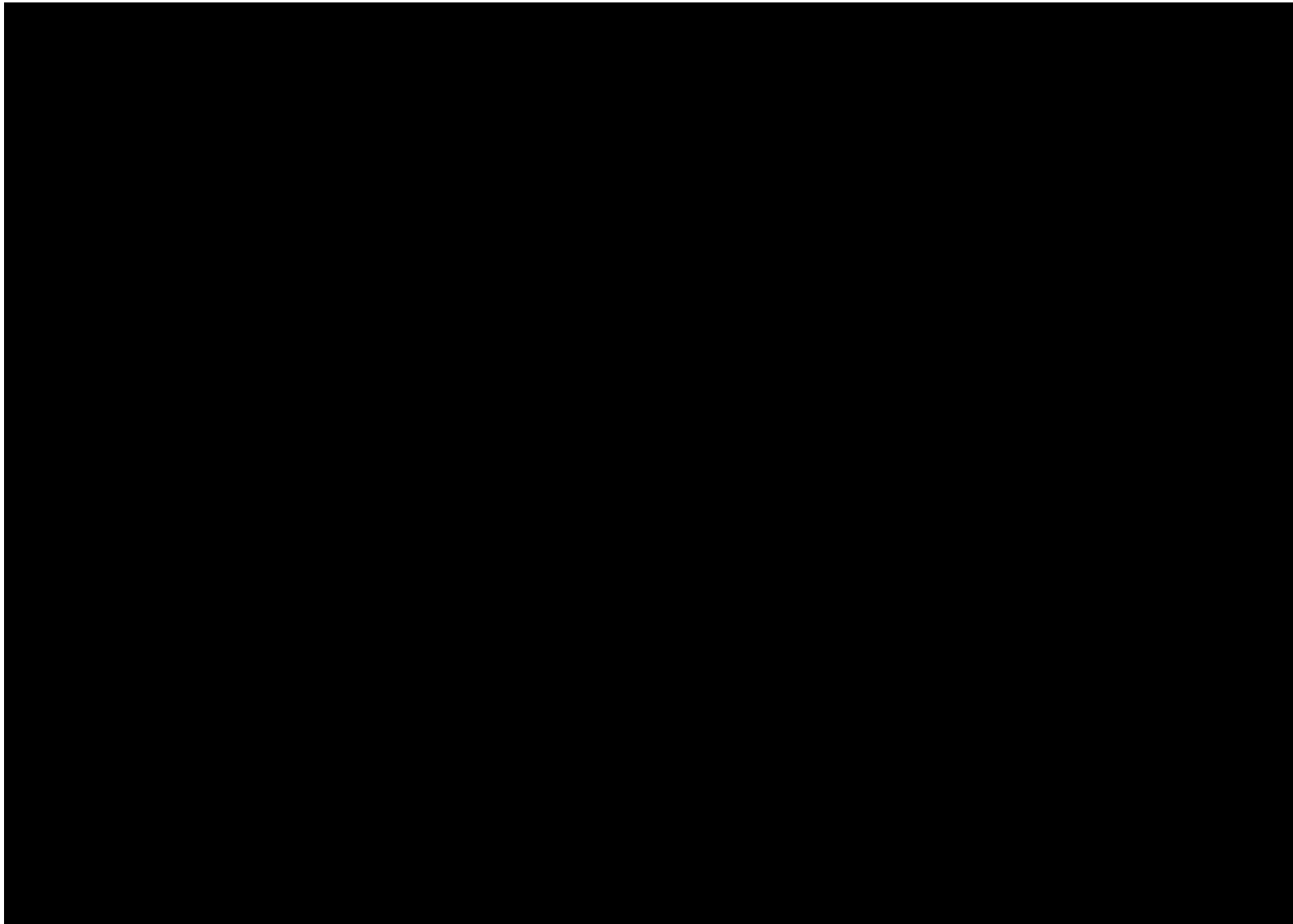


Figure 26: Extent of 135 Badgerys Creek Road Artefact Scatter 01



5.0 CULTURAL HERITAGE VALUES

5.1 Methodology

The cultural assessment in this report includes information collected through desktop assessment, archaeological survey and Aboriginal community consultation undertaken in accordance with the Consultation Requirements. This information was collected by Beatrix Ye (Graduate Heritage Consultant), Lily Hackett (Heritage Consultant), Jonny Love (Senior Heritage Consultant) and Samuel Sammut (Senior Heritage Consultant).

5.1.1 Cultural landscape

The World Heritage Convention of United Nations Educational, Scientific and Cultural Organisation (UNESCO) defines a cultural landscape as one which has 'powerful religious, artistic or cultural associations of the natural element rather than material cultural evidence, which may be insignificant or even absent' (UNESCO 1991). The relationship between Aboriginal Australians and the land is conceived in spiritual terms rather than primarily in material terms (Andrews et al 2006). Aboriginal cultural knowledge has been defined as:

Accumulated knowledge which encompasses spiritual relationships, relationships with the natural environment and the sustainable use of natural resources, and relationships between people, which are reflected in language, narratives, social organisation, values, beliefs and cultural laws and custom (Andrews et al 2006).

Aboriginal cultural knowledge was traditionally bequeathed through oral traditions from generation to generation. Within all Aboriginal communities there was a time of dislocation and upheaval associated with the arrival of colonial settlers. This widespread disruption resulted in much of the detailed knowledge and understanding of many of the elements of the cultural landscape being lost from the Aboriginal community, nonetheless many Aboriginal people maintain a strong connection to the land of their ancestors and collectively possess a wealth of knowledge passed down through the generations.

5.1.2 Types of values

Aboriginal people hold significant knowledge about traditional use of land before and after contact. The landscape which encompasses the study area has cultural value of importance to the Aboriginal community. The Aboriginal community collectively holds values and knowledge that relate to:

- Traditional values: these are passed down by family and community as part of ancient tradition.
- Historical values: these are passed down by family and community and relate to the eras since colonisation; these may include information gained from historical source documents
- Contemporary values: these are values of modern importance and relevance for Aboriginal stakeholder groups.

There is often no clear separation between these values, and they collectively co-exist with equal importance in forming the value that Aboriginal people place on landscape, cultural heritage, intangible heritage, and particular landforms or parts of the landscape.

5.2 Identified Aboriginal cultural heritage values

Table 9 provides a summary of the Aboriginal cultural heritage values associated with the study area.

Table 9: Cultural heritage values identified for the study and surroundings

Cultural heritage value	Description	Source
Cultural landscape	The Western Sydney region has been occupied by Aboriginal groups for tens of thousands of years, and this is evidenced by the ample archaeological evidence found within this region as well as the intangible connections modern Aboriginal people feel with the region. The area retains importance as part of a broader cultural network linked by watercourses, movement pathways and ancestral use.	Background assessment, Phil Khan (Kamilaroi Yankuntjatjara Working Group), Dean Delponte (Mundawari Heritage Consultants).
Pathways through the landscape	The gently undulating nature of the landscape in and surrounding the study area would have facilitated travel and land-use across the region, meaning that it may have held some significance to Aboriginal groups.	Background assessment; Gandangara LALC during archaeological survey
Waterways	The region around the study area contains numerous waterways which are known to be of significance to Aboriginal groups. These waterways are also associated with archaeological remains which evidence this importance. These include Wianamatta-South Creek, Thompsons Creek and Badgerys Creek.	Background assessment; AHIMS data
Views of the landscape	The undulating topography of the study area and its surrounds provide views over the surrounding landscape which may have been valued by Aboriginal groups in the past.	Gandangara LALC during archaeological survey

5.3 Aboriginal cultural values within the study area

The study area is situated within a broader landscape that contains significance to Aboriginal groups as a region that has been occupied for thousands of years and contains numerous significant landscape features. The topography of the study area and its immediate surrounds may have facilitated travel across the landscape and may therefore possess some cultural significance for local Aboriginal groups. Additionally, views from the study area out over the surrounding landscape may have been valued by Aboriginal groups.

6.0 SIGNIFICANCE ASSESSMENT

A significance assessment of the scientific, social, historic and aesthetic values of the study area is included below.

6.1 Significance assessment criteria

An assessment of the cultural heritage significance of an item or place is required in order to form the basis of its management. The Guide (OEH 2011: 10) provides guidelines, in accordance with the Burra Charter (Australia ICOMOS 2013) for significance assessment with assessments being required to consider the following criteria:

- Social values – does the area have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons
- Historic values – is the area important to the cultural or natural history of the local area and/or region and/or state
- Scientific values - does the area have the potential to yield information that will contribute to an understanding of the cultural and natural history of the local area and/or region and/or state
- Aesthetic values – is the area important in demonstrating aesthetic characteristics in the local area and/or region and/or state.

Scientific values should be considered in light of the following criteria:

- Research potential - does the evidence suggest any potential to contribute to an understanding of the area and/or region and/or state's natural and cultural history?
- Representativeness - how much variability (outside and/or inside the subject area) exists, what is already conserved, how much connectivity is there?
- Rarity - is the subject area important in demonstrating a distinctive way of life, custom, process, land-use, function or design no longer practised? Is it in danger of being lost or of exceptional interest?
- Education potential - does the subject area contain teaching sites or sites that might have teaching potential?

It is important to note that heritage significance is a dynamic value.

6.1.1 Historic value

Historic values refer to the association of place with aspects of Aboriginal history. Historic values are not necessarily reflected in physical objects, but may be intangible and relate to memories, stories or experiences.

The area has been identified as retaining historic value as it forms part of a broader cultural network linked by watercourses, movement pathways and ancestral use. The land has also been acknowledge as forming part of Darug Country.

6.1.2 Aesthetic value

Aesthetic values refer to the sensory, scenic, architectural, and creative aspects of the palace. These values may be related to the landscape and are often closely associated with socio/cultural values.

The study area may possess aesthetic values for the views of the surrounding landscape that it provides.

6.1.3 Socio/cultural value

Socio/cultural heritage values should be addressed by Aboriginal people who have a connection to, or interest in, the area.

Comments made by representatives of the Gandangara LALC during the survey of the study area suggest that the site may have acted as a pathway through the landscape and may therefore possess some socio/cultural value for the access to the region is provided.

6.1.4 Scientific value

No Aboriginal objects were identified through archaeological survey. However, based on the evidence presented in this report, it was believed that the study area contained the potential for archaeological objects to be present. The archaeological test excavation program within the study area identified 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018) (see Figure 26).

The scientific value of any present artefactual materials is unknown, and test excavation of the identified PAD is required to more accurately determine the scientific value of these potential remains.

A summary of the archaeological significance of the site identified is presented in Table 10.

Table 10: Significance assessment

Site name (AHIMS ID)	Research potential	Representativeness	Rarity	Education potential	Overall significance assessment
135 Badgerys Creek Road Artefact Scatter (AHIMS ID 45-5-6018)	Low	Low	Low	Low	Low

6.2 Statement of significance

No Aboriginal objects were identified through archaeological survey. However, based on the intactness of the slope landform within the study area, its proximity to watercourses, minimal levels of historic disturbance, observations made by representatives of the Gandangara LALC, and the archaeological character of the region around, the study area is viewed as likely to contain Aboriginal objects. The Aboriginal test excavation program recovered Aboriginal objects in the PAD and a new site was identified: 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018).

A total of 6 Aboriginal objects (stone artefacts) were recovered as part of the artefact scatter. It was observed that no Aboriginal objects were recovered from the mid to upper slope landform. The recovered assemblage was not interpreted as an intact deposit due to the identification of modern disturbance in soils where Aboriginal objects were recovered. The shallowness of the soils from which

the Aboriginal objects were recovered was also interpreted to indicate that rain and creek activity may have redeposited the objects into their excavated locations.

The identification of the low density subsurface artefact scatter, 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018), provides limited additional information and research potential about the Cumberland Plain as extant research indicates that the region is broadly characterised as a low density cultural landscape. Further, the low density and paucity of the recovered assemblage indicates that the assemblage contains low representative value. It is difficult to assess the variability and regional connectivity of an assemblage with a total of six artefacts recovered from 29 test pits. However, the recovered artefacts are typical of Cumberland Plain assemblages.

Overall, the artefact scatter represents a typical site type within this region and, as such, they are unlikely to significantly expand our understanding of the Aboriginal occupation and utilisation of the Bradfield area.

7.0 IMPACT ASSESSMENT

7.1 Development proposal

The proposed development will seek consent for the redevelopment of 135 Badgerys Creek Road Bradfield, comprising:

- Enabling works including vegetation removal and earthworks
- The construction of three buildings, comprising:
 - Residential use, including approximately 400 apartment units
 - Hotel use, including approximately 450 hotel rooms
 - Commercial use, including supermarket, food and drink and other commercial uses
 - Medical centre use
 - Childcare centre use
- Construction of two basement structures, including approximately 800 carparking spaces
- Public domain upgrades, including:
 - Construction of an internal road
 - A public plaza
- Rehabilitation and augmentation of the existing riparian corridor
- Landscaping embellishments on the ground level and within the built form
- Services augmentation as required.

Refer to the Environmental Impact Statement (EIS) for a detailed summary of the proposed development.

7.2 Aboriginal heritage impact

7.2.1 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018)

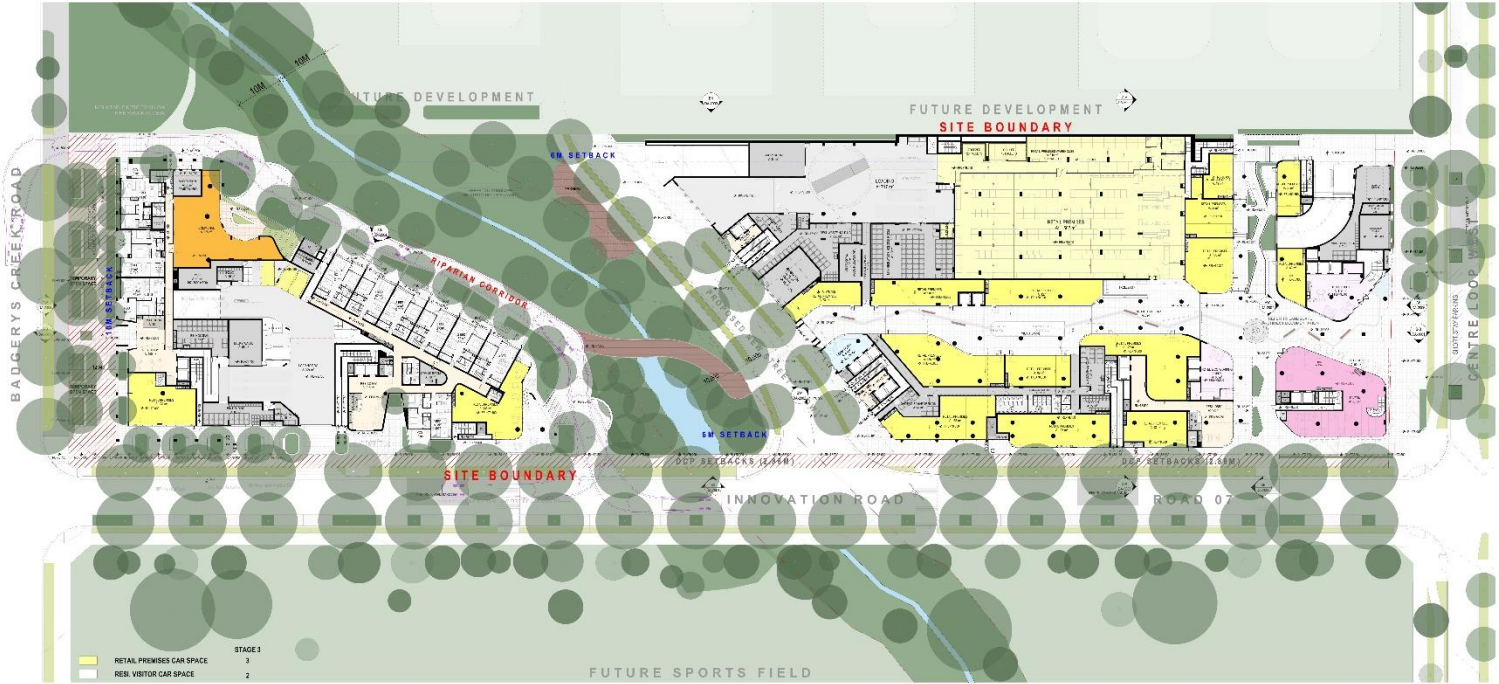
135 Badgerys Creek Road Artefact Scatter 01 would be directly impacted by the proposed development which includes the construction of large-scale buildings. In areas not directly subject to building development, earthworks and landscaping would impact the artefact scatter. As a result, the entire artefact scatter would be impacted by the development proposal which would result in a total loss of value.

A summary of the impacts is provided in Table 11.

Table 11: Impact assessment

Site name (AHIMS ID)	Type of harm	Degree of harm	Consequence of harm
135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018)	Direct	Total	Total loss of value

Figure 27: General Floor Plan – Ground 00 (final design provided by client September 2025)



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FOR INFORMATION

Figure 28: General Floor Plan – Basement 01 (final design provided by client September 2025)



CAR PARKING LEGEND

	BLDG A	BLDG B	BLDG C
RETAIL PREMISES CAR SPACE	0	0	0
RETAIL PREMISES CAR SPACE	0	0	0
HOTEL/CONFERENCE CAR SPACE	14 (1 ACC)	44 (3 ACC)	0
OVER CAR SPACE	0	44	0
MEDICAL CAR SPACE	0	10 (1 ACC)	0
COMMERCIAL CAR SPACE	0	0	0
CHILDREN CAR SPACE	0	0	0
RESIDENTIAL CAR SPACE	0	10	0 (10 ACC)
REAL VISITOR CAR SPACE	0	17	0
TAVERN CAR SPACE	4	0	0
CAR SHARE	0	4	0
TOTAL	18 (1 ACC)	143 (1 ACC)	0 (10 ACC)

NOTES:
 ACCESSIBLE PARKING SPACES WITH THEIR SHARED
 AREAS TO AVOID BEING A MIN. CLEAR HEIGHT OF 2.5M

NO.	CD	APP.	DATE	DATE	CDL NO.
01	14	AL	12/11/2018 (04)	12/11/2018	12101
02	15	AL	12/11/2018 (04)	12/11/2018	12101
03	20	AL	12/11/2018 (04)	12/11/2018	12101
04	20	AL	12/11/2018 (04)	12/11/2018	12101



PROJECT NAME	PROJECT NUMBER	PROJECT ADDRESS	PROJECT CITY
135 Badgerys Creek	20799	135 Badgerys Creek Road	Bradfield



FOR INFORMATION
 135 Badgerys Creek, Bradfield
 DEVELOPMENT APPLICATION

PROJECT NAME	PROJECT NUMBER	PROJECT ADDRESS
135 Badgerys Creek, Bradfield	20799	135 Badgerys Creek Road

7.3 Ecological Sustainable Development principles

The Guide (OEH 2011) specifies that Ecological Sustainable Development (ESD) principles must be considered when assessing harm and recommending mitigation measures in relation to Aboriginal objects.

The following relevant ESD principles are outlined in Section 3A of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*:

- Decision-making processes should effectively integrate both long term and short term economic, environmental, social and equitable considerations (the ‘integration principle’)
- If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation (the ‘precautionary principle’)
- The present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations (the ‘principle of intergenerational equity’).

7.3.1 The integration principle

Decision making processes should effectively integrate both long term and short term economic, environmental, social and equitable considerations (the ‘integration principle’). The preparation of this ACHAR demonstrates regard for the integration principle by considering Aboriginal heritage values and impacts to these from the proposal during the planning phase. The nature of the proposal is in itself one that contributes to the long term economic and social needs of current and future residents of the area.

7.3.2 The precautionary principle

If there are threats of serious or irreversible environmental damage, lack of full scientific confidence should not be used as a reason for postponing measures to prevent environmental degradation (the ‘precautionary principle’). Archaeological test excavations and archaeological survey were conducted within the study area to address the precautionary principle. Aboriginal objects were recovered and a new site was registered on AHIMS: 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018). This archaeological investigation undertaken demonstrates a precautionary approach.

7.3.3 The principle of intergenerational equity

The proposed works would adhere, as close as possible, to the principle of intergenerational equity by collating scientific and cultural information on former Aboriginal occupation of the study area through the previous investigations and this ACHAR. The ATR prepared an assessment of the study area and synthesised the regional character of Aboriginal objects and sites for posterity and future generations.

7.4 Cumulative impacts

A cumulative impact is an impact on Aboriginal cultural heritage resulting from the incremental impact of the action/s of a development when added to other past, present and reasonably foreseeable future actions. Aboriginal artefacts were recovered within the study area and a new site was registered on AHIMS: 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018).

The proposed development would result in harm to the registered site, adding to the incremental destruction of Aboriginal cultural heritage within the broader Badgerys Creek area. However, as these sites are considered to be of low significance, the proposed development is considered to result in a minor cumulative impact.

8.0 MANAGEMENT AND MITIGATION MEASURES

8.1 Guiding principles

The overall guiding principle for cultural heritage management is that where possible Aboriginal sites should be conserved.

Where unavoidable impacts occur then measures to mitigate and manage impacts are proposed. Mitigation measures primarily concern preserving the heritage values of sites beyond the physical existence of the site. The most common methods involve detailed recording of Aboriginal objects, archaeological test and salvage excavations, artefact analysis and, where appropriate, reburial of Aboriginal objects in a location determined by the RAPs.

Mitigation measures vary depending on the assessment of archaeological significance of a particular Aboriginal site and are based on its research potential, rarity, representatives and educational value. In general, the significance of a site would influence the choice of preferred conservation outcomes and appropriate mitigation measures, usually on the following basis:

- Unknown archaeological significance – avoidance where possible. Archaeological test excavation is an irreversible destructive process, and Aboriginal objects should be left *in situ* where possible. If areas of unknown archaeological significance are at risk of unavoidable harm, archaeological test excavations must be completed to verify the presence of Aboriginal objects and gather enough information to determine the significance of the site
- Low archaeological significance – conservation where possible. SSD Conditions of Approval would be required to impact the site before work can commence
- Moderate archaeological significance – conservation where possible. If conservation was not practicable, further archaeological investigation would be required such as salvage excavations or surface collection in accordance with the SSD Conditions of Approval
- High archaeological significance – conservation as a priority. Where all other practical alternatives have been discounted mitigation measures such as comprehensive salvage excavations in accordance with the SSD Conditions of Approval would be required.

8.2 SSD Conditions of Consent

135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018) would be impacted by the proposed development resulting in a total loss of value. No further archaeological mitigation measures are required for the artefact scatter due to the site's assessed low significance. SSD Conditions of Consent are required to approve harm to 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018). This site must not be harmed prior to SSD Conditions of Consent are obtained.

8.3 Heritage induction

A heritage induction must be prepared and would outline the Aboriginal history of the area and guidance on identifying Aboriginal artefacts in the field. This is required for contractors to fulfill the Unexpected Finds Procedure (UFP) as well as an outline of the legislative framework and penalties

for harming Aboriginal sites without the appropriate consent. The UFP should also include an unexpected human remains policy.

8.4 Temporary and long-term care and management of retrieved Aboriginal objects

The temporary repository of any retrieved artefacts will be in a locked cupboard on the premises of the archaeological consultant.

Long term management of the Aboriginal objects would involve the reburial of the artefact assemblage within portion of land that would not be disturbed by future works. Reburial will be undertaken in accordance with the Requirement 26 of the Code of Practice. The reburial will be undertaken using the following method:

- In preparation for reburial, artefacts will be placed in resealable bags labelled with excavation unit and artefact number information. Excavation unit and artefact number information will also be recorded on an archival standard label in each resealable bag. RAPs have also recommended that artefacts reburied on Country within the study area are wrapped in paperbark and have requested reburial hole to be machine excavated to between 60 cm to 1 m in depth
- Copies of documentation related to the project will also be prepared for reburial including:
 - The artefact catalogue
 - A copy of the ACHAR, ATER, and ATR
 - Copies of site card submitted to the AHIMS database following test excavation
- Artefacts and reburial documentation will be sealed in an impervious container which will be labelled with permanent marker or engraved
- Reburial will be undertaken by a team comprising of an archaeologist(s) and RAP representatives
- The reburial location will be recorded using a non-differential GPS with burial site features including burial depth, location in relation to other permanent features and a photographic record maintained of the reburial.

Following reburial, a site card will be submitted for the reburial location with ASIRFs submitted for all sites which have had Aboriginal objects reburied.

The proponent has suggested that the reburial of the Aboriginal objects can take place within the riparian corridor (creek line) of the proposed development. The riparian corridor is unlikely to be impacted by future works in perpetuity. The Traditional Owners of the area have communicated to the proponent that they open to using the Aboriginal objects recovered during the excavations in a museum setting for teaching purposes. The Traditional Owners are also open to permanently taking possession of the Aboriginal objects recovered during the test excavation.

8.5 Changes to the project area

Advice provided within this ACHAR is based upon the most recent information provided by the proponent at the time of writing. Any changes made to the project should be assessed by an archaeologist in consultation with the RAPs. Any changes that may impact on Aboriginal sites not

assessed as part of the project may warrant further investigation and result in changes to the recommended management and mitigation measures.

9.0 CONCLUSION

9.1 Summary of findings

Based on a combination of archaeological and cultural heritage value, this Aboriginal Cultural Heritage Assessment Report has identified the following:

- No Aboriginal objects were identified in the study area during archaeological survey
- An area of PAD (135 Badgerys Creek Road PAD 01) was identified within the study area. This area was identified as a PAD based on its proximity to watercourses, its apparent low levels of historic disturbance, observations made by representatives of Gandangara LALC during the archaeological survey, and the results of other archaeological investigations from the surrounding region
- Following the Aboriginal test excavation program, 135 Badgerys Creek Road PAD 01 has been revised to be identified as 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018)
 - 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018) is located on an intact landform on a slope (gentle incline) within proximity to watercourses and within an area in which minimal historical disturbance has been observed. Based on the 6 stone artefacts identified during the test excavation program, this area has been assessed as a low density artefact scatter which has low significance.
- 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018) would be directly and totally impacted by the proposed development
- No further archaeological mitigation measures are required for the artefact scatter due to the site's assessed low significance.

9.2 Recommendations

Based on these findings, the following recommendations have been made:

- SSD Conditions of Consent is required to harm the identified site: 135 Badgerys Creek Road Artefact Scatter 01 (AHIMS ID 45-5-6018)
- Ongoing consultation with the Registered Aboriginal Parties would continue throughout the life of the project, if necessary. For example, ongoing consultation with Registered Aboriginal Parties would take place in the event of any unexpected Aboriginal objects being identified during works
- A heritage induction including an UFP must be prepared and all workers must be inducted prior to the commencement of works
- Any changes that may impact on Aboriginal sites not assessed as part of the project may warrant further investigation and result in changes to the recommended management and mitigation measures

- Long term management of the Aboriginal objects would involve the reburial of the artefact assemblage within a portion of the land that would not be disturbed by the proposed development. Reburial would be undertaken in accordance with Requirement 26 of the Code of Practice.
- A copy of this report should be sent to Gandangara LALC for their records.

10.0 REFERENCES

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APPENDIX A – ARCHAEOLOGICAL TECHNICAL REPORT

Redacted from public view

APPENDIX B – TEST EXCAVATION METHODOLOGY

Redacted from public view

APPENDIX C – ARCHAEOLOGICAL TEST EXCAVATION REPORT

Redacted from public view

APPENDIX D – CONSULTATION LOG AND RECORDS

Redacted from public view



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