

11 December 2025

Dan D'Ambrosio
Project Director
Logic Projects Co.
Level 30, Tower Two, 200 Barangaroo Avenue
Barangaroo NSW 2000

Our Reference: 24-0484C

Re: Julius Avenue Data Storage Centre—ACHAR addendum

Dear Dan D'Ambrosio,

Logic Projects Co engaged GML Heritage (GML) to prepare an Aboriginal Cultural Heritage Assessment report (ACHAR) for 6–8 Julius Avenue, North Ryde, legally described as Lot 89 in Deposited Plan 1082131 (Figure 1). The project is subject to State Significant Development Application (SSDA) SSD-80010208.

The project ACHAR *Julius Avenue Data Storage Centre Aboriginal Cultural Heritage Assessment Report* (19 May 2025) was subject to agency review by Heritage NSW (HNSW). Agency advice was received from HNSW on 29 July 2025 (HMS ID 11310), as follows:

1. *The survey coverage indicated in Figure 4.1 does not sufficiently sample the area of proposed works in Survey Unit 2 (SU2). Heritage NSW note that as indicated in Section 4.1, SU2 has the potential to contain sandstone outcrops and overhangs which may contain Aboriginal objects/art/engravings. In consideration of this;*
 - a. *Additional survey is required in SU2 where works are proposed, specifically the access road connection to Richardson Place and the location of the Ausgrid STTS [sic] and Indoor MBS Room. Please update the ACHAR with additional survey tracks and discussion of the results of the additional survey.*

The purpose of this letter addendum is to address the HNSW agency advice. This letter provides context on proposed design amendments with respect to the Aboriginal cultural heritage (ACH) of the study area, and details the outcomes of the additional archaeological survey undertaken within the southern portion of the study area.

Sydney Office

Level 17
323 Castlereagh Street
HAYMARKET NSW
Australia 2000
+61 2 9319 4811
heritage@gml.com.au

Canberra Office

2A Mugga Way
RED HILL ACT
Australia 2603
+61 2 6273 7540
heritage@gml.com.au

GML Heritage Pty Ltd
ABN 60 001 179 362

Melbourne Office

17 Drummond Street
CARLTON VIC
Australia 3053
+61 3 9380 6933
heritage@gml.com.au

GML Heritage Victoria Pty Ltd
ABN 31 620 754 761

ACH context and previous archaeological survey

The archaeological predictive statement prepared for the study area, as part of the project ACHAR, identified that dense artefact deposits are unlikely to be present within the study area due to its landscape context and history of land use impact. The predictive model identified that discontinuous low-density background artefact scatters could be present within areas of remnant Gympie soils, or within rock shelters, if present within the study area. The study area was considered to have nil archaeological sensitivity in areas of prior deep excavation in the north, low to nil sensitivity on previously developed areas outside of the deep excavation zone, and low archaeological sensitivity within the south of the study area, where impacts have predominantly been limited to vegetation clearance.

Previous archaeological survey undertaken for the ACHAR in March 2025 (see SU1 and SU2 in Figure 4) confirmed the extent of impacts within the northern portion of the study area and suggested that the southern portion of the study area, which comprised predominantly regrowth vegetation, had been subject to some prior disturbance. When coupled with the mid-slope landform context, the south portion of the site was considered to hold low Aboriginal archaeological potential. Areas of disturbance not noted in examination of aerial photography were observed within the south of the study area during the survey, including a semi-formal walking track, evidence of sub-surface services, low earth mounds understood to be soil stockpiles associated with past land clearing, and frequent crushed sandstone, interpreted as debris from land clearance works within this area in the mid-2000s and debris from upslope works washed or rolled downslope.

No Aboriginal objects or sites were observed, and no overhangs suitable for use as rock shelters were observed.

Proposed design amendments

Based on agency and stakeholder feedback, Logic Project Co propose to amend the project design and impact footprint. The overall data centre facility IT load has been reduced, in turn resulting in design modifications including the removal of basement levels, reduction in size of the Sub-Transmission Switching Station (STSS), and removal of the proposed link road within the south of the study area (Figure 2 and Figure 3).

The STSS facility will be moved out of the bushland portion of the study area in the south and into the previous disturbed north of the study area, along the western side of the proposed data centre building. This reduces impacts to the bushland within the south of the study area by 3,246m². Combined with the removal of the link road under the proposed design amendments, the majority of the southern bushland portion of the study area will not be subject to development impacts, with the aim of retaining the native vegetation within this area.

With regards to the HNSW agency advice, the amendments to the proposed design have removed proposed impacts associated with the access/link road adjoining Richardson Place and the Ausgrid STTS which were to form the focus of the additional survey.

Nonetheless, application of the precautionary principle meant that GML undertook additional survey to confirm the Aboriginal archaeological potential of the study area.

Additional survey

Archaeological survey to respond to the HNSW agency advice was conducted on 2 December 2025. The additional survey was conducted in accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW, 2010) and the survey sampling strategy provided to the RAPs in Stage 2.1, in a manner consistent with the survey conducted on 3 March 2025. The four RAP groups who had participated in the March survey were invited to attend the reinspection. Two of these groups were available to attend the December survey.

The additional survey was undertaken by GML and two representatives from the project RAPs:

Person	Role	Affiliation
Declan Coman	Archaeologist	GML
Darleen Johnson	Site officer, RAP	Murra Bidgee Mullangari Aboriginal Corporation
Ethan Trewlynn	Site officer, RAP	Long Gully Cultural Services

The aim of the additional survey was to supplement the survey coverage from Survey Unit 2 (SU2) from the March 2025 archaeological survey, ie within the southern bushland portion of the study area. The additional survey aimed to identify and record all material traces and evidence of Aboriginal land use visible at or on the ground surface, exposed in sections or visible as features. Following the agency advice from HNSW regarding the potential for rock shelters within the southern portion of the study area, the survey also aimed to identified whether any sandstone outcrops and overhangs, which could contain Aboriginal objects, art or engravings, were present, and if present, confirm whether these types of Aboriginal heritage were present.

Additional survey was conducted as a single survey unit; Survey Unit 3 (SU3) (Figure 4 and Figure 5). Ground cover and visibility across Survey Unit 3 was moderate to low, with dense vegetation obscuring ground surfaces both on the flatter portions of the stepped midslope (Figure 6) as well as on the inclined portions (Figure 7).

At the very eastern extent of SU3, adjacent to Richardson Place, the lower portion of the rock face had been previously disturbed by modern construction activities (Figure 8). The sandstone was uniformly cut with evidence of machined striations visible in the profile and metal intrusions installed into the rock face (Figure 9).

Above the machine cut rock face, the landform stepped in to a second face of exposed stone at the north-eastern extent of SU3. This upper section did not show evidence of modification (Figure 10, Figure 11). At the far north-eastern extent of this formation, a single sandstone overhang was observed above a sheer drop (Figure 12). The overhang was too low and shallow to permit a person to stand or lay inside. The overhang was visually inspected, which included photography digitally processed using iDStretch. The outcome was that no art, rock engravings or soil deposits were observed within this overhang (Figure 13).

In the east of SU3, along an existing track that facilitated access the upper section of the rock face from the lower section, multiple instances of modern disturbance were observed. Concrete stairs have been installed on the upper sections of the incline (Figure 14) and sections of exposed stone have incised by machine impacts (Figure 15).

In the centre of SU3, dense vegetation obscured ground surfaces on the lower steps of the stepped midslope (Figure 16). Visibility was higher on the instances of exposed stone were observed along the centre of SU3, which were inspected and did not contain evidence of engravings (Figure 17). No shelters were observed beneath the rock outcrops through the centre of SU3, as all the observed instances of rock outcrops were too low to contain overhangs large enough for human access (Figure 18). No overhangs or engravings were observed along the rock outcrops along the northern extent of SU3 (within the centre south of the study area) (Figure 19, Figure 20).

In the northwest of SU3, no rock overhangs were observed separating the artificial flat landform from the natural stepped midslope. Instead, an embankment of soil was present at the north-west corner of the survey unit (Figure 21). The north-west corner of SU3 also showed more evidence of land clearing (Figure 22) as well as modern earthmoving works with overgrown spoil piles being identified (Figure 23).

In the west of SU3, the stepped midslope flattens out into a large, flat area of exposed rock outcrops (Figure 24) with portions of this extended stone formation having been impacted by the construction of a semi-formalised walking track (Figure 25).

In the south western extent of the study area, the stepped midslope landform descends down from these exposed stone surfaces towards the M2 Motorway with rocky outcrops (Figure 26) forming steep but navigable terrain (Figure 27). A single overhang was observed in this area (Figure 28), measuring 2.44m in length, 1.46m in height and 0.56m in depth. The floor of the overhang was uneven and rocky, with large pieces of stone likely lying where they fell during the formation of the overhang (Figure 29).

The condition of the floor and the shape and size of the overhang likely made it unsuitable as a shelter from the elements. The deposit at the floor of the overhang was inspected but contained no surface expressions of artefacts. The walls and the ceiling of the overhang were inspected in detail (Figure 30), with photos of the surfaces being processed through digital enhancements in the field (again using iDStretch, Figure 31). No indication of rock engravings or pigmented art was observed.

In summary, the additional survey confirmed the prior interpretation and analysis of the study area. The additional survey did not identify any Aboriginal objects, engraved art or pigmented art. The two sandstone overhangs identified during the survey were generally unsuited for human occupation and did not contain Aboriginal objects or an Aboriginal archaeological deposit.

Conclusions

Proposed design modifications reduce the proposed extent of development, and thus 'impacts' within the southern portion of the 6-8 Julius Avenue site. Design modifications include removal of proposed impacts associated with the STSS and access/link road. These areas formed the focus of HNSW agency advice. Nonetheless supplementary archaeological survey within the southern portion of the study area was undertaken as a precautionary measure in December 2025 by GML and representatives of the RAPs.

The survey confirmed that no Aboriginal sites, objects or places were present in the area inspected, and no overhangs suitable for use as rock shelters were identified. The results of additional survey suggest that the slope of the southern portion of the study area is not sufficient for the formation of suitably sized rock shelters, rather has predominantly resulted in a series of low, stepped sandstone benches. Evidence of significance disturbance in this area was observed, including machine cuts into the bedrock near the east boundary of the study area, soil stockpiles and embankments, and concrete stairs.

Following the additional archaeological survey, the archaeological potential of the southern portion of the study area continues to be considered low. We consider the potential for rock shelters within this portion of the study area to be very low to nil, due to the low stepped slope of the study area. No rock art, engraved or pigment, was observed during either survey. Based on the results of both the March and December surveys, it is unlikely that art sites are present within the study area. The management recommendations outlined in the ACHAR remain valid and are not altered by the findings of the recent archaeological survey.

This letter forms an addendum to the project ACHAR and will be provided to all project RAPs for their records.

We trust that this letter responds to the HNSW agency advice and clearly details the outcomes of the additional archaeological survey undertaken.

Yours sincerely,



Andie Coulson
Heritage Consultant
GML Heritage Pty Ltd



Declan Coman
Heritage Consultant
GML Heritage Pty Ltd

Figures



Figure 1 The study area. (Source: Nearmap with GML overlay, 2025)

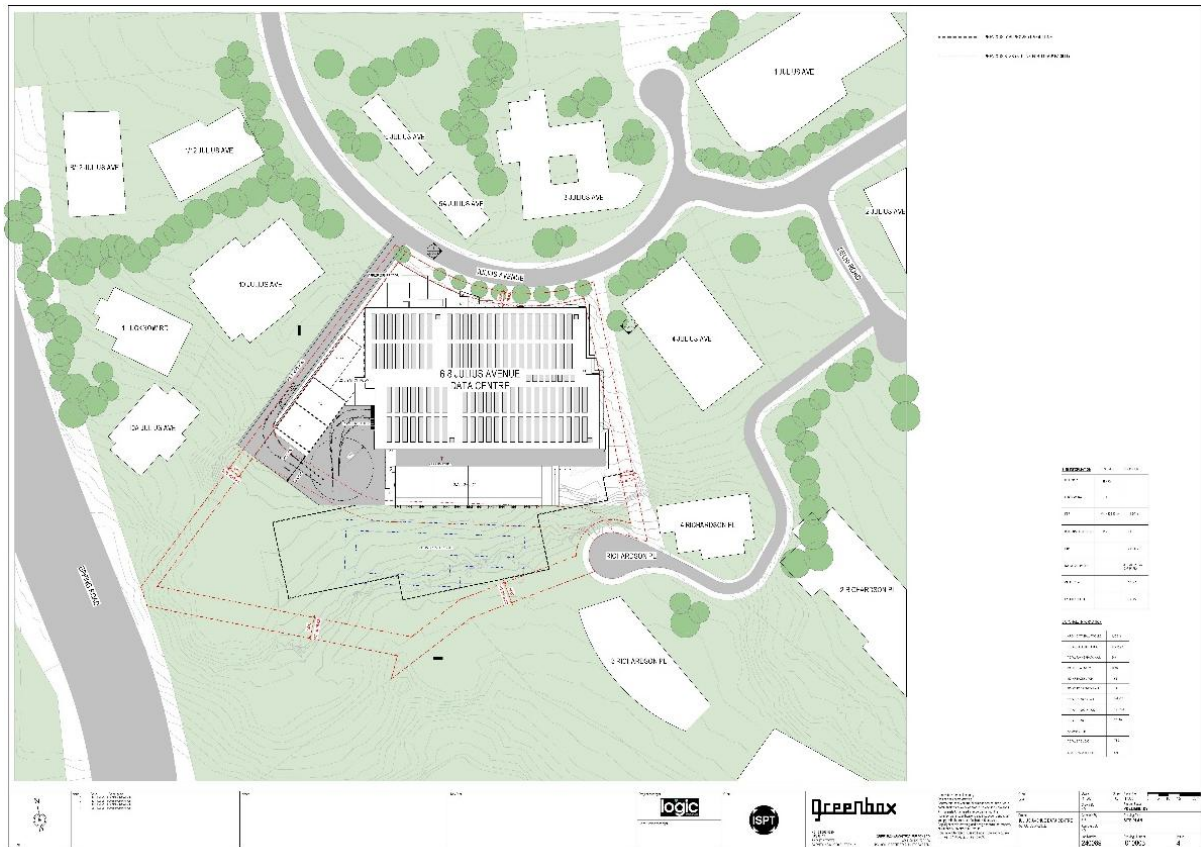


Figure 2 Plan of the proposed design amendments. The black dashed line indicates the previously approved DA outline, and the blue dashed line shows the previous STSS footprint. (Source: Greenbox, 2025)

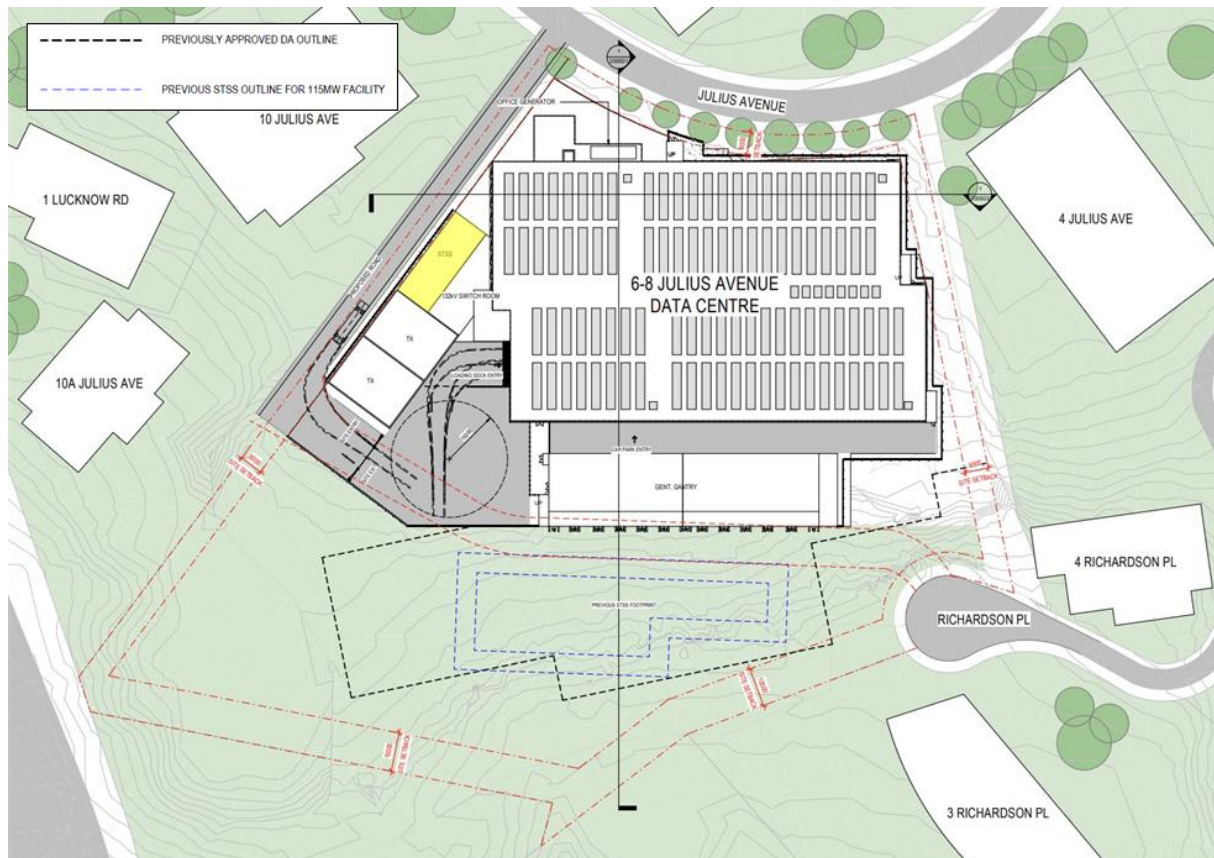


Figure 3 Detail of the proposed design amendments. The black dashed line indicates the previously approved DA outline, and the blue dashed line shows the previous STSS footprint. The yellow highlighted area shows the new STSS location. The link road within the south of the study area has been removed from the design. (Source: Greenbox with GML overlay, 2025)

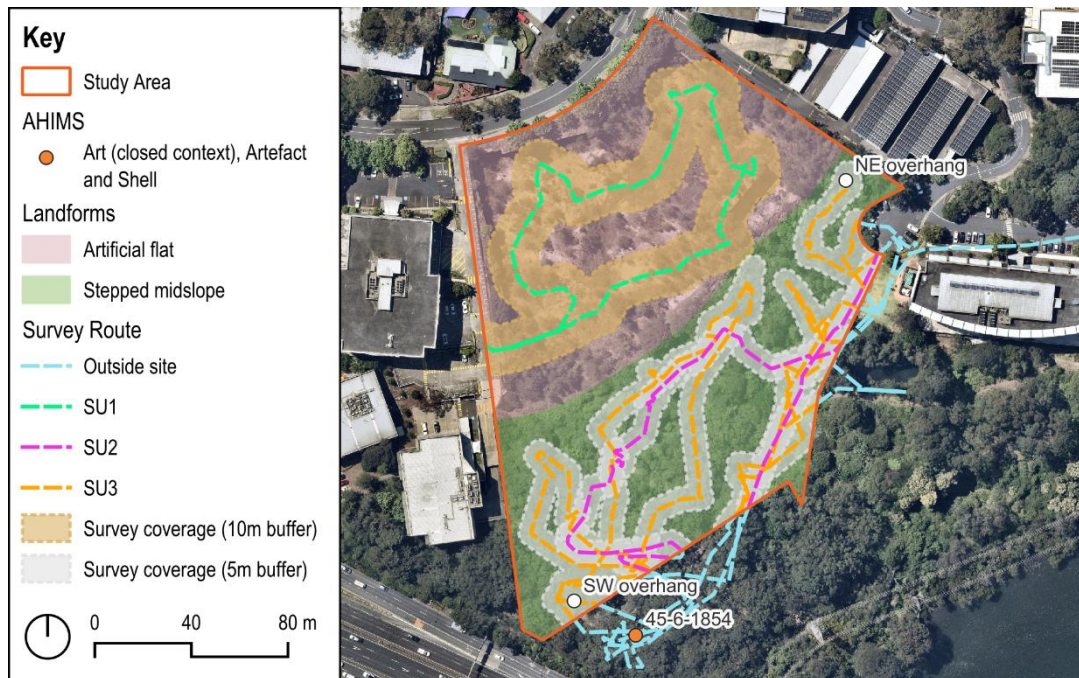


Figure 4 Survey coverage across SUs 1, 2 and 3 from the March and December 2025 archaeological surveys. (Source: Nearmap with GML overlay, 2025)

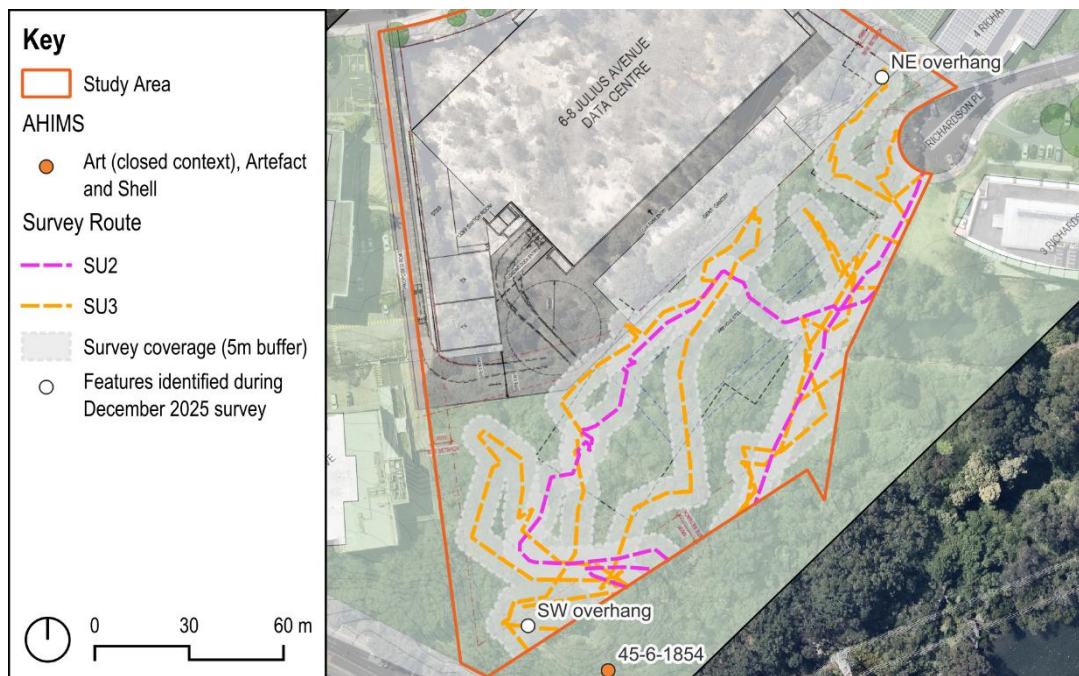


Figure 5 Detail of SU2 and SU3 within the south of the study area, overlain on the plan of proposed design amendments. The black dashed line on the plan of works indicates the previously approved DA outline, and the blue dashed line shows the previous STSS footprint. The link road within the south of the study area has been removed from the design. (Source: Nearmap and Greenbox with GML overlay, 2025)



Figure 6 Vegetation and visibility in the east of SU3.



Figure 7 Vegetation and visibility in the east of SU3.

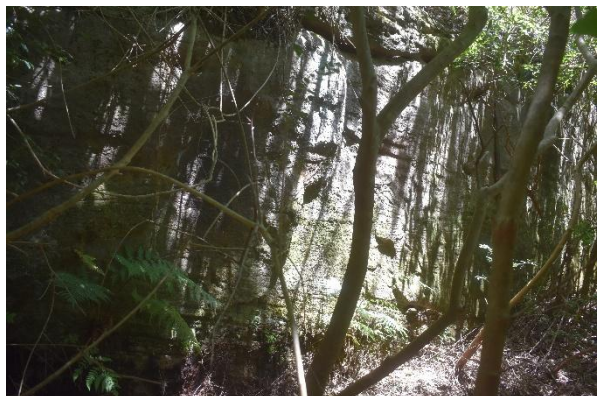


Figure 8 Lower rock face at the eastern extent of SU3 showing evidence of modern modification.



Figure 9 Lower rock face at the eastern extent of SU3 showing evidence of modern modification.

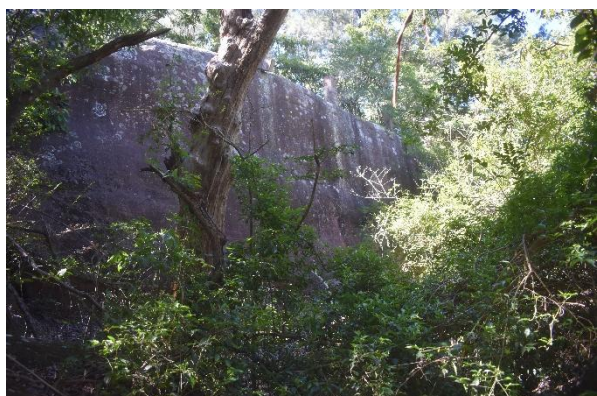


Figure 10 Upper rock face at the eastern extent of SU3.

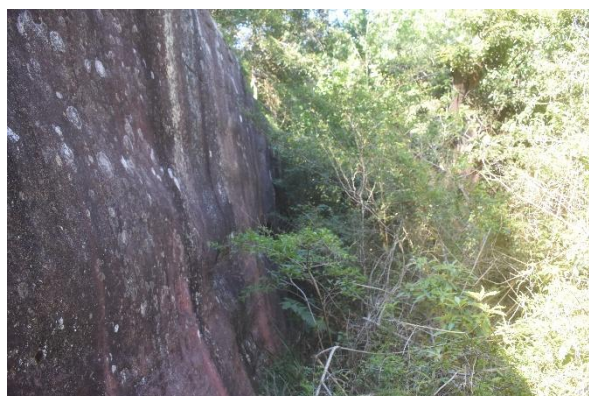


Figure 11 Upper rock face at the eastern extent of SU3.



Figure 12 Upper rock face at the eastern extent of SU3 (red line tracing upper lip of overhang).



Figure 13 Upper rock face at the eastern extent of SU3 with sheer drop visible in bottom right corner.



Figure 14 Evidence of modern disturbances in the form of concrete stairs in the east of SU3.



Figure 15 Evidence of modern disturbances in machined incisions into rock outcrops.



Figure 16 Vegetation and ground cover on lower steps in the centre of study area.



Figure 17 Stepped rock outcrops through the centre of SU3.



Figure 18 Rock outcrops in the centre of SU3.



Figure 19 Rock outcrops in the centre-north of SU3.



Figure 20 Rock face in the centre-north of SU3.



Figure 21 Dense vegetation in the north-west of SU3 with an earthen embankment visible in background.



Figure 22 Vegetation and ground surfaces in the north-west corner of study area.



Figure 23 Overgrown spoil pile in the north-west corner of study area.



Figure 24 Exposed bedrock outcrops on midslope in west of SU3.



Figure 25 Exposed bedrock outcrops on midslope in west of SU3.



Figure 26 Vegetation, ground surfaces and rock outcrops in the south-western extent of SU3.



Figure 27 Rock outcrops at the western extent of SU3.



Figure 28 Rock overhang at the south-western extent of study area.



Figure 29 Floor of rock overhang at the south-western extent of study area.



Figure 30 Walls and roof of overhang.



Figure 31 iDStretch of Figure 30 showing no evidence of rock art.