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Greensquare Datacentre

Aboriginal Cultural Heritage Assessment Report

Written for GreenSquare DC

The Hills Local Government Area

May 2026



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Executive summary

This report has been prepared on behalf of Project Garden 1 Pty Ltd as trustee for the Norwest Property Trust (the applicant) in support of a State Significant Development Application (SSDA) submitted to the Department of Planning, Housing and Infrastructure (DPHI) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The SSDA seeks development consent for the construction and operation of a data centre, with a total power consumption of approximately 96MW. The proposal will form part of a state-of-the-art data centre campus operated by Green Square Data Centres (Green Square DC), equipped to cater for growing data storage needs within Australia and the emergence of artificial intelligence (AI).

The site is known as 3 Brookhollow Avenue, Norwest (Lot 2021 DP 831173) and is in the Norwest locality, which forms part of the Hills Local Government Area (LGA). Development surrounding the site comprises of a mix of commercial, retail and residential land uses.

This SSDA seeks development consent for the construction and operation of a data centre, with a total power consumption of approximately 96MW. The proposal will form part of a broader state-of-the-art data centre campus, equipped to cater for growing data storage needs within Australia and the emergence of artificial intelligence (AI).

This ACHAR has been prepared as a response to this requirement. It has also been prepared according to the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010b) and aims to assess and document Aboriginal cultural values and outline the consultation process with Aboriginal stakeholders.

Consultation

Everick Heritage has conducted the community consultation process in accordance with the Consultation Requirements (DECCW 2010a), the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010 (DECCW 2010b) and the Burra Charter 2013 (Australia ICOMOS 2013).

A total of 14 Registered Aboriginal Parties Expressed an interest in the project and were included in the consultation. Three (3) responses were received from the Final Draft ACHAR, all in support, with one RAP additionally recommending that gardens and landscaping be done with native Australian plants.

Desktop assessment and survey

An archaeological survey was undertaken on 1 August 2025; No Aboriginal Sites or Objects were identified during the archaeological survey. No trees exhibiting evidence of cultural modification were identified and it was assessed that all trees on site were planted following the establishment of the data centre site in the 1990s.

It was identified that much of the survey area had been heavily disturbed. Evidence of terracing and levelling was present across much of the Project Area, with high degree of ground disturbance near to all present buildings and areas of artificial ground surfacing. No permanent water sources were identified within the Project Area, and it was assessed that Strangers Creek has been subjected to substantial modification, including alterations to formalise the channel and the addition of a fountain.

The Project Area is predicted to be of low to moderate sensitivity due to its proximity to Strangers Creek and location on slightly elevated flats in the Cumberland Plain; however, due to the extensive prior disturbance, including earthworks, infrastructure development, and landscape modification, it is assessed as having low archaeological potential, with very low likelihood of intact Aboriginal cultural heritage sites being present.

Cultural Values Assessment

Although no Aboriginal objects or sites were identified within the Project Area during the current assessment, its proximity to recognised culturally significant places emphasises the potential for the area to be part of a broader cultural landscape. Therefore, consideration should be given to the cultural sensitivity of the area in future land use planning, management and design.

Recommendations

This ACHAR has identified that the Project Area is of low archaeological potential and sensitivity. The proposed works are considered highly unlikely to result in impact to Aboriginal cultural heritage, therefore in accordance with the Planning Secretary's Environmental Assessment Requirements (SEARs) and *Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010a) the proposed works may proceed without further investigation. This ACHAR addresses requirement 19 of the SEARs.

Unexpected finds procedure

While it is not anticipated that further Aboriginal objects will be present within the Project Area, it is not inconsistent with the investigation results that unexpected Aboriginal objects may be present. If unexpected Aboriginal objects are identified, further investigation may be required. All works within the

vicinity of the find must be halted, and the finds should be reported to a suitably qualified Archaeologist who will assess the finds and develop a management plan in consultation with the RAPs where appropriate. If it is determined that the find is Aboriginal in origin, a variation to the AHIP will be sought.

If suspected human remains are discovered and/or harmed in, on or under the land within the Project Area, the following actions must be undertaken:

- Works in the vicinity of the potential find must be halted
- An exclusion zone of 10m established around the potential object
- The Heritage Consultant and RAPs must be informed and assess the find.
- If it is determined that no Aboriginal site is present, or impacts can be avoided works may proceed with caution.
- If Aboriginal objects are present, and impacts cannot be avoided, appropriate mitigation measures must be established in consultation with RAPs
- Heritage NSW and the RAPs must be informed of all unexpected finds,
- If an Aboriginal site is identified a site card must be prepared and the site must be registered on AHIMS.

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Glossary

Term	Definition
ACHAR	Aboriginal Cultural Heritage Assessment
AHC	Australian Heritage Council
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
ALR Act	<i>Aboriginal Land Rights Act 1983 (NSW)</i>
ATR	Aboriginal Archaeological Technical Report
ASRF	Aboriginal Site Recording Form
ATSIHP Act	<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)</i>
Australian Heritage Council Act	<i>Australian Heritage Council Act 2003 (Cth)</i>
BP	Before Present (the year 1950)
CHL	Commonwealth Heritage List
Code of Practice	<i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i>
Consultation Requirements	<i>Aboriginal cultural heritage consultation requirements for proponents 2010</i>
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DCP	Development Control Plan
DECCW	Department of Environment, Climate Change and Water (now DCCEEW)
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
EPBC Act	<i>Environment Protection and Diversity Conservation Act 1999 (Cth)</i>
ESD	Ecologically Sustainable Development

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Term	Definition
Everick Heritage	Everick Heritage Pty Ltd
the Guide	<i>Guide to Investigating, Assessing and Reporting on Aboriginal cultural heritage in NSW</i>
GPS	Global Positioning System
GSDC	Greensquare Datacentre
GSV	Ground Surface Visibility
ha	Hectare/s
ILUA	Indigenous Land Use Agreement
km	Kilometre/s
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
LGA	Local Government Area
NHL	National Heritage List
NPW Act	<i>National Parks and Wildlife Act 1974 (NSW)</i>
OEH	(former) New South Wales Office of Environment and Heritage
PAD	Potential Archaeological Deposit
Project Area	3 Brookhollow Ave, Norwest, NSW
RAP	Registered Aboriginal Party
RNE	Register of the National Estate
RNTBC	Registered Native Title Body Corporate
s	Section
SHI	State Heritage Inventory (NSW)

1. Introduction

1.1. Purpose of this report

This report has been prepared on behalf of Project Garden 1 Pty Ltd as trustee for the Norwest Property Trust (the applicant) in support of a State Significant Development Application (SSDA) submitted to the Department of Planning, Housing and Infrastructure (DPHI) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The SSDA seeks development consent for the construction and operation of a data centre, with a total power consumption of approximately 96MW. The proposal will form part of a state-of-the-art data centre campus operated by Green Square Data Centres (Green Square DC), equipped to cater for growing data storage needs within Australia and the emergence of artificial intelligence (AI).

This report provides an assessment of 3 Brookhollow Ave, Norwest and respond to the Secretary's Environmental Assessment Requirements (SEARs, SSD-81928961) issued by DPHI on 8 April 2025 in relation to the project. The SEARs require the following in relation to the assessment of Aboriginal Heritage.

Aboriginal Cultural Heritage (SEARs)	Documentation
19. Aboriginal Cultural Heritage Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts to any Aboriginal cultural heritage sites or values associated with the site.	Aboriginal Cultural Heritage Assessment Report

1.2. Site overview

1.2.1.Site context

The site is known as 3 Brookhollow Avenue, Norwest (Lot 2021 DP 831173) and is in the Norwest locality, which forms part of the Hills Local Government Area (LGA). Development surrounding the site comprises of a mix of commercial, retail and residential land uses as described below:

- To the north of the site is Norwest Boulevard, commercial office buildings, an early learning centre, 'Castle Pines' retirement community and Castle Hill Country Club Golf Course;

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- To the east of the site is Windsor Road, commercial office buildings, small pockets of residential development and industrial development;
- To the south of the site is Brookhollow Avenue, commercial developments, a hotel and medium density residential development; and
- To the west of the site is commercial development, including a shopping centre (Norwest Marketown), various retail offerings and the Norwest Metro Station.

The site is well serviced by public transport including bus and Metro. Norwest Metro Station provides connections to Tallawong in the northwest and Sydney CBD to the southeast. Bus stops along Norwest Boulevard provide connections through to Parramatta, Seven Hills and Rouse Hill.

As shown (Figure 1-1), the site is in proximity to Strangers Creek and Brookhollow Reserve, located at the site's southwestern border. Norwest Lake is located approximately 90m northwest of the site.

1.2.2. Site description

The subject site is legally described as Lot 2021 of Deposited Plan (DP) 831173. The site can be described as irregularly shaped and has a total land area of approximately 51,867 sqm. A portion of the site currently comprises an existing 4MW data centre that was approved under D93/318, dated 21 June 1993.

The site is bound by Brookhollow Avenue to the south and east, Brookhollow Reserve and the Hills Corporate Centre to the west and Norwest Boulevard to the North. The primary frontage of the site is to Brookhollow Avenue, where vehicular access is provided.

Based on a review of topographical mapping, the site appears to fall from east to west from a maximum height of RL104 in the northeastern corner of the site to RL82m along the western portion of the site.

The site is located approximately 500m to the east of the Norwest Metro station, with the metro line running under the north / northwest boundary of the site.

The site is heavily vegetated, however, none of the vegetation is mapped on the biodiversity values mapping prepared under the *Biodiversity Conservation Act 2016* (BC Act).

1.3. Overview of proposed development

This SSDA seeks development consent for the construction and operation of a data centre, with a total power consumption of approximately 96MW. The proposal will form part of a broader state-of-the-art

data centre campus, equipped to cater for growing data storage needs within Australia and the emergence of artificial intelligence (AI).

- Specifically, the proposal includes:
- Minor site preparation works including tree clearing and bulk earthworks;
- Civil earthworks and the installation of relevant servicing infrastructure and utilities;
- Construction of a four (4) storey data centre with roof top plant, equating to an RL 130 and Gross Floor Area (GFA) of 16,191m²;
- Installation of 77 x diesel fuel generators and associated diesel storage
- Provision of on-site car parking for approximately 25 spaces; and
- Landscaping and offset tree planting.

The proposed development is depicted in Figure 1-2, with full architectural details provided within the EIS, of which this report also forms an Appendix.

1.4. Assessment methodology

1.4.1. SEARs relevant to this report

This report has been prepared to respond to the SEARs issued for GreenSquare DC 96MW data centre project. The SEARs that are relevant to this Aboriginal Cultural Heritage assessment, and where they are addressed within this report, are detailed below.

Issue and Assessment Requirements	Documentation	Response
Item 19	ACHAR	This ACHAR has been prepared and completed in accordance with the Code of Practice and the Consultation Guidelines.

1.5. Study objectives

The objectives of this ACHAR are to determine what, if any, impacts the proposed rezoning may have upon Aboriginal archaeological and cultural values, and to identify the appropriate cultural heritage mitigation measures in consultation with the Aboriginal Community.

This ACHAR has been undertaken in accordance with the following guidelines:

- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010* (Code of Practice) (Department of Environment, Climate Change & Water [DECCW] 2010b).
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Guide) (Office of Environment & Heritage [OEH] 2011).
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (Consultation Requirements) (DECCW 2010c).
- The Burra Charter 2013 (Australia ICOMOS 2013).

1.6. Authors and contributors

This ACHAR was managed by Gareth Holes, Senior Archaeologist (Everick Heritage) who has over 18 years of experience as an archaeologist and heritage consultant. In addition, the individuals listed in the following table attended and/ or supported the survey and assessment in various capacities.

Table 1-1: Authors and contributors to the investigation

Contributor	Affiliation	Role	Qualification
Jason Giang	Everick Heritage	Specialist Archaeologist, site survey	Ba – Archaeology (Hons) 6+ years
Gareth Holes	Everick Heritage	Senior Archaeologist, report writing and project management	BA (Hons) 6 years Test excavation supervisor and report author on ACHA xx location
Amber Hewson	Everick Heritage	Archaeologist, report writing	BA. Arch. Dip. Cultural Heritage Materials Conservation 3 years Contributing author
Maryam Hosseini	Everick Heritage	GIS Specialist, project mapping	PhD (Civil and Environmental Engineering) Master in GIS Bachelor of Engineering 8 Years
Steven Knight	Deerubbin LALC	Field assistance, provision of cultural knowledge	

Contributor	Affiliation	Role	Qualification
Nathan Donovan	Deerubbin LALC	Field assistance, provision of cultural knowledge	

1.7. Report structure

The purpose of this report is to document the results of an investigation of Aboriginal heritage at the Project Area. As such, the structure of this report includes:

Table 1-2: Report structure

Report structure
Section 1 – Introduction: the proposed works, Project Area, study objectives and report authorship.
Section 2 – Legislative context: relevant legislation for this assessment.
Section 3 – Consultation: outline of the Aboriginal consultation process.
Section 4 – Environmental and historical land use: overview of the environmental conditions to provide context for the predictive model.
Section 5 – Ethnohistorical and archaeological context: overview of ethnohistorical research.
Section 6 – Archaeological survey: overview of the archaeological survey of the Project Area.
Section 7– Cultural values assessment: review of cultural values, based on background research and consultation results.
Section 8 – Significance assessment: results of the cultural heritage assessment, identifying Aboriginal cultural values and landscapes.
Section 9 – Impact assessment: assessment of potential impacts to Aboriginal Objects, Sites and Places and discusses ecologically sustainable principles.
Section 10 – Recommendations: relevant management and mitigation measures for the Project.
Section 11 – References
Appendix A – Consultation log
Appendix B – Newspaper notice
Appendix C – Consultation documentation
Appendix D – Archaeological Technical Report

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Figure 1-1: Project Area

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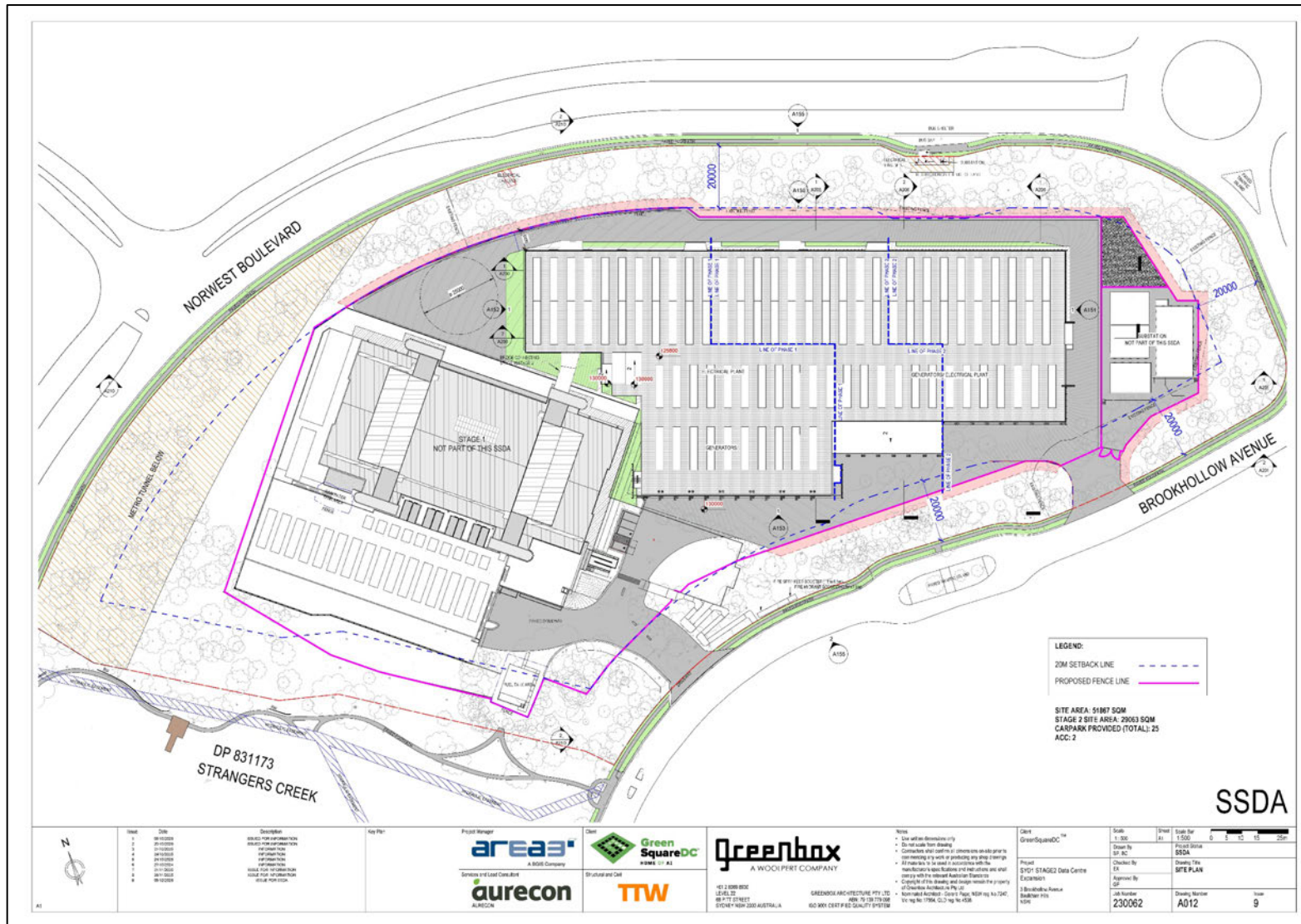


Figure 1-2: Project Design (provided by GSDC, December 2025).

2. Legislative context

2.1. Commonwealth Legislation

2.1.1. Environment Protection and Biodiversity Conservation Act 1999 (Cth)

The *Environment and Heritage Legislation Amendment Act (No.1) 2003* (Cth) amends the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) to include 'national heritage' as a matter of National Environmental Significance and protects listed places to the fullest extent under the Constitution. It also establishes the National Heritage List (NHL) and the Commonwealth Heritage List (CHL).

The *Australian Heritage Council Act 2003* (Cth) (AHC Act) establishes the Australian Heritage Council (AHC), an advisory body to the Minister for the Environment and Heritage and retains the Register of the National Estate (RNE).

The *Australian Heritage Council (Consequential and Transitional Provisions) Act 2003* (Cth) (Australian Heritage Council Act) repeals the *Australian Heritage Commission Act 1975* (Cth), amends various Acts as a consequence of this repeal and allows the transition to the current heritage system.

Together the above three Acts provide protection for Australia's natural, Indigenous and non- Indigenous heritage. Features include:

- The NHL of places of national heritage significance.
- The CHL of heritage places owned or managed by the Commonwealth.
- The creation of the AHC, an independent expert body to advise the Minister on the listing and protection of heritage places.
- Continued management of the Register of the National Estate (RNE).

2.1.1.1. National Heritage List

The NHL is a list of places with outstanding heritage value to our nation, including places overseas. So important are the heritage values of these places that they are protected under the EPBC Act. This means that a person cannot take an action that has, will have, or is likely to have, a significant impact on the national heritage values of a national heritage place without the approval of the Australian Government Minister for the Environment and Heritage. It is a criminal offence not to comply with this law and there are significant penalties.

2.1.1.2. Commonwealth Heritage List

The CHL is a list of places managed or owned by the Australian Government and not of relevance to this project.

2.1.1.3. Register of the National Estate

The RNE is an evolving record of Australia's natural, cultural and Aboriginal heritage places that are worth keeping for the future. The AHC compiles and maintains the RNE under the *Australian Heritage Council Act 2003*. Places on the RNE that are in Commonwealth areas, or subject to actions by the Australian Government, are protected under the EPBC Act by the same provisions that protect Commonwealth heritage places (see above).

Following amendments to the Australian Heritage Council Act, the RNE was frozen on 19 February 2007, meaning no new places can be added, or removed. From 2012, all references to the RNE were removed from the EPBC Act and the AHC Act. The RNE is now maintained on a non-statutory basis as a publicly available archive.

2.1.2. Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)

Most State Aboriginal heritage databases provide protection for those sites with physical evidence. The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)* (ATSIHP Act) deals with Aboriginal cultural property in a wider sense. Such cultural property includes any places, objects and folklore that 'are of particular significance to Aboriginals in accordance with Aboriginal tradition'. In most cases, archaeological sites and objects registered under the State Act will also be Aboriginal places subject to the provisions of the ATSIHP Act.

There is no cut-off date and the ATSIHP Act may apply to contemporary Aboriginal cultural property as well as ancient sites. The ATSIHP Act takes precedence over State cultural heritage legislation where there is conflict. The responsible Minister may make a declaration under Section 10 of the ATSIHP Act in situations where state or territory laws do not provide adequate protection of heritage places.

The Australian Government Gazette hold a record of all applications for the protection of specific areas under the ATSIHP Act. A search of the Government Gazette has confirmed that there is not a specific area protected by the provisions of the ATSIHP Act.

2.2. State Legislation

2.2.1. National Parks and Wildlife Act 1974 (NSW)

The *National Parks and Wildlife Act 1974* (NSW) (NPW Act) provides statutory protection to all Aboriginal places and objects. An Aboriginal object is defined as:

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

An Aboriginal Place is declared by the Minister under section (s) 86 of the NPW Act. Aboriginal Places are recognised for their special significance to Aboriginal culture. Aboriginal Places gazetted under the NPW Act are listed on the State Heritage Register established under the *Heritage Act 1977* (NSW).

Part 6 of the NPW Act provides specific protection for Aboriginal objects and declared Aboriginal places by establishing offences of harm. Harm is defined to mean:

destroying, defacing, damaging or moving an object from the land.

The protection provided to Aboriginal objects applies regardless of the level of their significance or issues of land tenure. Aboriginal objects and places are afforded statutory protection in that it is an offence to knowingly or unknowingly desecrate an Aboriginal object or place under section (s) 86 of the NPW Act.

In accordance with s 89A any person who is aware of the location of an Aboriginal object must notify the Chief executive in the prescribed manner within a reasonable time of becoming aware of that object. The prescribed manner is through preparation and submission of an Aboriginal Site Recording Form (ASRF) to the Aboriginal Heritage Information Management System (AHIMS) (DECCW 2010b: 14).

In order to undertake a proposed activity which is likely to involve harm to an Aboriginal object or Aboriginal Place it is necessary to apply to Heritage NSW (Department of Climate Change, Energy, the Environment and Water [DCCEEW]) for an Aboriginal Heritage Impact Permit (AHIP). AHIPs are issued by the Aboriginal Heritage Regulation Team (Heritage NSW) under section 90 of the NPW Act and permit harm to certain Aboriginal objects and Aboriginal Places.

2.2.2. Heritage Act 1977 (NSW)

The Heritage Act, is administered by the DCCEEW, protects the natural and cultural heritage of New South Wales. Although Aboriginal cultural heritage is primarily protected by the NPW Act, provisions relating to the Heritage Act may apply if the item is listed on the State Heritage Register or is subject to

an interim heritage order. An item or places' Aboriginal heritage values may contribute to the overall heritage significance of the place.

The Heritage Act is established by the NSW Heritage Council which provides the Minister for Heritage with recommendations for the listing of items on the State Heritage Register. The Minister approved the listing of items and places on the State Heritage Register and can prevent the destruction or alteration of items or places with potential State heritage values with the implementation of an interim heritage order until the significance of the item has been assessed.

2.2.3. Environmental Planning and Assessment Act 1979 (NSW)

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is administered by the Department of Planning, Housing and Infrastructure which provides planning controls and requirements for environmental assessments in the development approval process. The main parts of the EP&A Act which relate to the development assessment and approval are Part 4 (Development assessment) and Part 5 (Environmental assessment) which both require Aboriginal cultural heritage values be assessed prior to approval.

Division 4.7 of the EP&A Act allows for the Minister with portfolio responsibility for planning to declare a specified development SSD, declaration of SSD turns off the AHIP provision under Section 90 of the NPW Act. Aboriginal objects and sites remain protected under the NPW Act and all works must be authorised under SEARs or Ministers Conditions of Consent as appropriate. SEARs were issued on 8 April 2025 (SSD-88215996)

2.2.4. Aboriginal Lands Right Act 1983 (NSW)

Aboriginal Land Councils (at the State and local level) were established by the *Aboriginal Land Rights Act 1983* (NSW) (ALR Act). Aboriginal Land Councils have a statutory obligation under the ALR Act to:

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

The Project Area is within the boundary of the Deerubbin LALC.

2.2.5. Native Title Act 1994 (NSW)

The *Native Title Act 1994* (NSW) was introduced to work in conjunction with the *Native Title Act 1993* (Cth). Native Title claims, registers and Indigenous Land Use Agreements (ILUA) are administered under the Act. A search of National Native Title Tribunal was undertaken on 04 August 2025, no determination of Native Title was in place, for the Project Area and no Native Title claims were found.

3. Consultation

Everick Heritage has conducted the community consultation process in accordance with the Consultation Requirements (DECCW 2010a), the Code of Practice (DECCW 2010b) and the Burra Charter 2013 (Australia ICOMOS 2013).

3.1. Stage 1 Notification of Project Proposal and Registration of Interest

In accordance with Step 4.1.2 of the Consultation Requirements the following organisations were contacted to request names of Aboriginal people or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places within the project Area or nearby:

- Deerubbin LALC
- The Registrar, *Aboriginal Land Rights Act 1983* (NSW)
- National Native Title Tribunal
- NTSCORP
- The Hills City Council
- Greater Sydney Local Land Services
- Aboriginal Heritage Regulation Team, Heritage NSW, Department of Premier and Cabinet (DPC)

In accordance with Step 4.1.3 of the Consultation Requirements, an advertisement was placed on BuySearchSell.com.au on 30 July 2025 seeking to consult with Aboriginal persons regarding the project and who hold cultural knowledge of the region to register their interest by 28 August 2025 (Appendix B).

In accordance with Step 4.1.3 of the Consultation Requirements, letters and emails were sent to all Aboriginal people and organisations identified through the response by the agencies contacted as part of Step 4.1.2, primarily Heritage NSW. These letters and emails were sent on 30 July 2025, provided details about the location and nature of the project and invited those with an interest to register by 13 August 2025.

Table 3-1 provides a list of those Aboriginal parties who registered. In accordance with Step 4.1.6 of the Consultation Requirements a list of the registered Aboriginal parties (RAPs) and a copy of the advertisement (Step 4.1.3) were forwarded to Heritage NSW and Deerubbin LALC.

Table 3-1: Registered Aboriginal parties

Organisation	First name	Surname
Didge Ngunawal Clan	Redacted	
Didyarigur		
Wailwan		
Marri Culture and Heritage		
Guntawang Aboriginal Resources Incorporated		
Guugaburra Yiramiilan		
Long Gully Cultural Services		
Corroboree Aboriginal Corporation		
Deerubbin Lalc		

3.2. Stage 2 – Presentation of Information about the Proposed Project and Stage 3 – Gathering Information about Cultural Significance

In accordance with Step 4.2 and Step 4.3 of the Consultation Requirements, a copy of the ACHAR methodology, which included more detailed information regarding the Project, potential impacts to Aboriginal cultural heritage and a request for information about cultural significance, was sent to the RAPs by email on 14 August 2025, requesting a response by 11 September 2025. Seven responded in all support of the methodology, Redacted commented that she had surveyed the area in 2017 and that it was disturbed, she further noted that it should be stated to be Darug Country (Table 3-2). The remaining RAPs provided no further response or comment.

Table 3-2: Comments received to the draft ACHAR Methodology

Organisation	Name	Comment	Everick Heritage reply
Dharug Custodian Aboriginal Corporation	Redacted	Redacted noted that this area was previously surveyed in 2017 and stated that it was disturbed.	Response provided noting the feedback.

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Organisation	Name	Comment	Everick Heritage reply
Deerubbin LALC	Redacted	please make recommendation that all groups have to share the load in digging and cleaning the sieves up at the end of the day and pack up as well.	No excavation is anticipated for this Project, will include in future methodologies.
Long Gully Cultural Services	Redacted	Supports the methodology	Noted
Corroboree Aboriginal Corporation	Redacted	Supports the methodology	Noted
GARI	Redacted	Supports the methodology	Noted
Kamilaroi Yankuntjatjara Working Group	Redacted	Supports the methodology	Noted

3.3. Stage 4 – Review of the Draft Cultural Heritage Assessment Report

The draft ACHAR was sent for RAP review on the 15 September 2025. An undeliverable report was received from one RAP, so an attempt to contact them via phone was made, an answerphone message was left however no reply was received. Three RAPs responded to the request for review of the ACHAR, Redacted GARI recommended that planting be done with native Australian plants in recognition of the Aboriginal people of the land, this was conveyed to the Proponent who confirmed that native plants were included in the landscaping and planting plans. All three respondents supported the recommendations; a summary is provided in Table 3-3.

Table 3-3: Comments received to the draft ACHAR

Organisation	Name	Comment Summary	Everick Heritage reply
GARI	Redacted	Recommend gardens with native Australian plants in recognition of first peoples of the land.	Response noting that this feedback has been passed on to the Proponent who have confirmed that native plants are included in the landscaping and planting plans.
Dharug Custodian Aboriginal Corporation	Redacted	Support the recommendations	Response provided noting the feedback.

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Organisation	Name	Comment Summary	Everick Heritage reply
Kamilaroi Yankuntjatjara Working Group	Redacted	Have reviewed and support recommendations	Noted

4. Environmental and historical land use context

4.1. Environmental background

The following table provides a summary of the environmental characteristics and historical land use of the Project Area relevant to the assessment of Aboriginal cultural heritage. A more detailed discussion of environmental factors is included in Appendix D – Archaeological Technical Report.

Table 4-1: Summary of environmental characteristics

Environmental Attribute	Summary
Geomorphology and soils	The Project Area is situated on the Cumberland Plains and is located on the boundary between the Blacktown and Luddenham soil landscapes. The Luddenham soil landscape is surrounded by the Blacktown soil landscape and comprises low rolling to steep low hills, with convex narrow ridges and hillcrests grading into moderately inclined side slopes that have narrow concave drainage lines as well. The soil profile within the Blacktown soil landscape consists of a brownish black loam topsoil (A Horizon) up to 300 millimetres (mm) in depth, followed by a hard-setting clay loam (A2 Horizon), which is typically 100 – 300 mm thick. The subsoil is a light brown clay which typically occurs at depths of 500 mm (Figure 4-2). Although this area has experienced disturbance, these deeper soils may still contain Aboriginal objects.
Topology and hydrology	The Project Area is situated on the lower slopes of a gently undulating hill with a westward gradient towards Strangers Creek. The landform consists of a low gradient slope transitioning into alluvial floodplain and a drainage depression along the Riparian creek corridor. These watercourses would have provided year-round access to fresh water. Riparian environments typically supported higher diversity of flora and fauna. The well drained elevated land would have been ideal for camping and repeated occupation (Figure 4-1).
Landscape, flora and fauna	The Project Area has been heavily modified by past construction activities. All of the vegetation has been cleared prior to the construction of the GSDC. The Blacktown soil landscape supports open dry sclerophyll forest, which has been extensively cleared for agriculture and residential development. Dominant tree species include Forest Red Gum, Narrow-Leaved Ironbark, Grey Box, and Spotted Gum, with occasional stands of Grey Gum near Penrith and Mugga Ironbark on the crests. The floral and faunal diversity of the local area would have provided a range of resources to Aboriginal people. Aboriginal people would have travelled throughout the landscape to access the resources provided by this diversity

4.2. Land use history

In 1799, the first formalised settlement of the Seven Hills region began following the issuing of a joint 980-acre (396.5 ha) land grant to Joseph Foveaux and Charles Grimes. In 1801, the land was sold to John Macarthur, who incorporated it into his 'Seven Hills Farm' estate. By May 1821, the 'Seven Hills Farm' estate was resumed by the Crown in exchange for Macarthur receiving another land grant in Camden. Following this, the Seven Hills region was subdivided and sold. Of this land, James Robertson was granted a 500-acre (202.3 ha) property, on which the heritage-listed 'Bella Vista Farm' was later constructed. During its first decades, the region was primarily under cereal agriculture, with wheat farms created to sustain the growing colony. However, the poor soils were quickly exhausted, with cereal cultivation being replaced by orcharding as it was recognised that the latter was the more viable practice (Brooks 2008).

On 19 October 1831, a 500-acre (202.3 ha) land grant that included the Project Area was subdivided from the former 'Seven Hills Farm' estate and sold to Susanna Matilda Ward, widow of Lieutenant William Gordon Ward of the 1st Regiment of Foot Guards. Before acquiring the land, Susanna Matilda Ward had served as the Matron of the Female Orphanage Institution, Parramatta, from 1821 to 1824. On 12 March 1835, Ward sold a 200-acre (80.9 ha) portion of her grant, including the Project Area, to George Banks Suttor, owner of the adjacent estate to the east of Windsor Road (Tanner & Associates Pty Ltd 2000:21). On 3 September 1875, the property was sold to Edward Hart Acres, landowner of the 'Heywood' estate, located to the north (Brook 2008). The land was then sold to John Booth Jones, Charles Smith Jones and Rowland Hassall on 11 November 1886 and passed to Rowland George Hassall on 12 August 1904.

The Norwest Business Park was conceived during the 1980s, with Baulkham Hills Shire Council and the New South Wales State government rezoning the land in 1987. During this time, the land on which the Project Area is located was subdivided and road construction began on Norwest Boulevard and Brookhollow Avenue. By 1989, groundworks for the road construction had been initiated to the north and south of the 3 Brookhollow Avenue site, with extensive levelling and other earthmoving activities conducted. Subdivision and sale of the business park was initiated in 1992. By 1993, Cathay Pacific Airways purchased the 3 Brookhollow Avenue site for \$5.2 million, with the intention of building a \$260 million data centre to replace their Hong Kong facility (Corrigan 1993). Construction began in 1994 and was completed in 1995, constituting the first phase of development within the Norwest Business Park. In 1997, Cathay Pacific commenced negotiations for the transfer of the data centre to IBM Global Services (Connors 1997). A larger carpark area was constructed on the eastern side of the data centre building in 1998, with this being the most recent, observable major alteration to the fabric and spatial arrangements of the site.

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The documented land use history of the Seven Hills region demonstrates that the Project Area has been subject to extensive and repeated modification since the early 19th century. Initial land grants, subdivision, orcharding and cattle grazing would have resulted in significant ground disturbance through ploughing, planting, and associated infrastructure. Subsequent property transfers and changes in land management, followed by 20th-century commercial redevelopment, further altered the natural landscape. This long history of intensive use and modification has likely removed or displaced intact archaeological deposits, contributing to the Project Area's current highly disturbed condition.

Table 4-2: Summary of historic land use

Map/Image	Description
1955 historical aerial image (Figure 4-3)	The 1955 aerial shows the Project Area was mainly agricultural with orchards to the south and some residential construction in the southwest (Figure 4-3)
1965 historical aerial image (Figure 4-4)	Limited development is evident in the broader area in 1965 (Figure 4-4), including the appearance of several larger buildings to the south of the Project Area, indicating the early stages of suburban expansion.
1991 historical aerial image (Figure 4-5)	In the 1991 (Figure 4-5) groundworks for the road construction had been initiated to the north and south of the 3 Brookhollow Avenue site, with extensive levelling and other earthmoving activities conducted. Subdivision and sale of the business park was initiated in 1992.
1994 aerial image (Figure 1-1)	By 1994 (Figure 4-6) imagery reveals significant landscape modification, including the diversion of Strangers Creek into a series of artificial ponds and culverts, forming part of a planned drainage and water management network associated with urban development. A large carpark area was constructed on the eastern side of the data centre building.

4.2.1. Summary of land use

The Project Area has been subject to extensive historical disturbance including, but not limited to:

- Road construction;
- Earthworks, subdivision;
- Diversion of Strangers Creek as part of a planned urban drainage system; and
- construction of the data centre and associated infrastructure.

Therefore, it is unlikely that any intact Aboriginal cultural heritage or archaeological sites are present within the area.

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Figure 4-1: Topography and Hydrology of the Project Area

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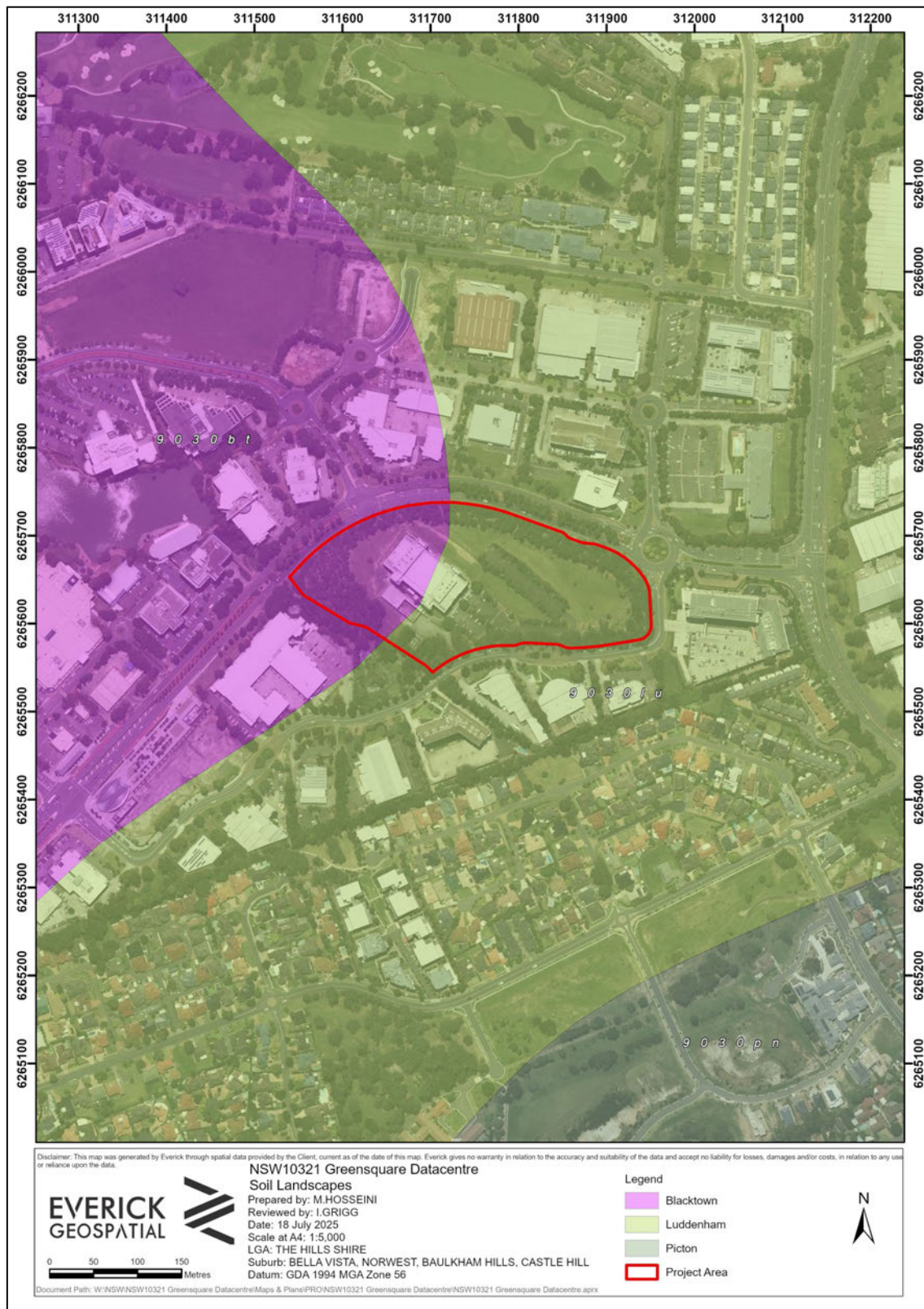


Figure 4-2: Soil landscapes of the Project Area

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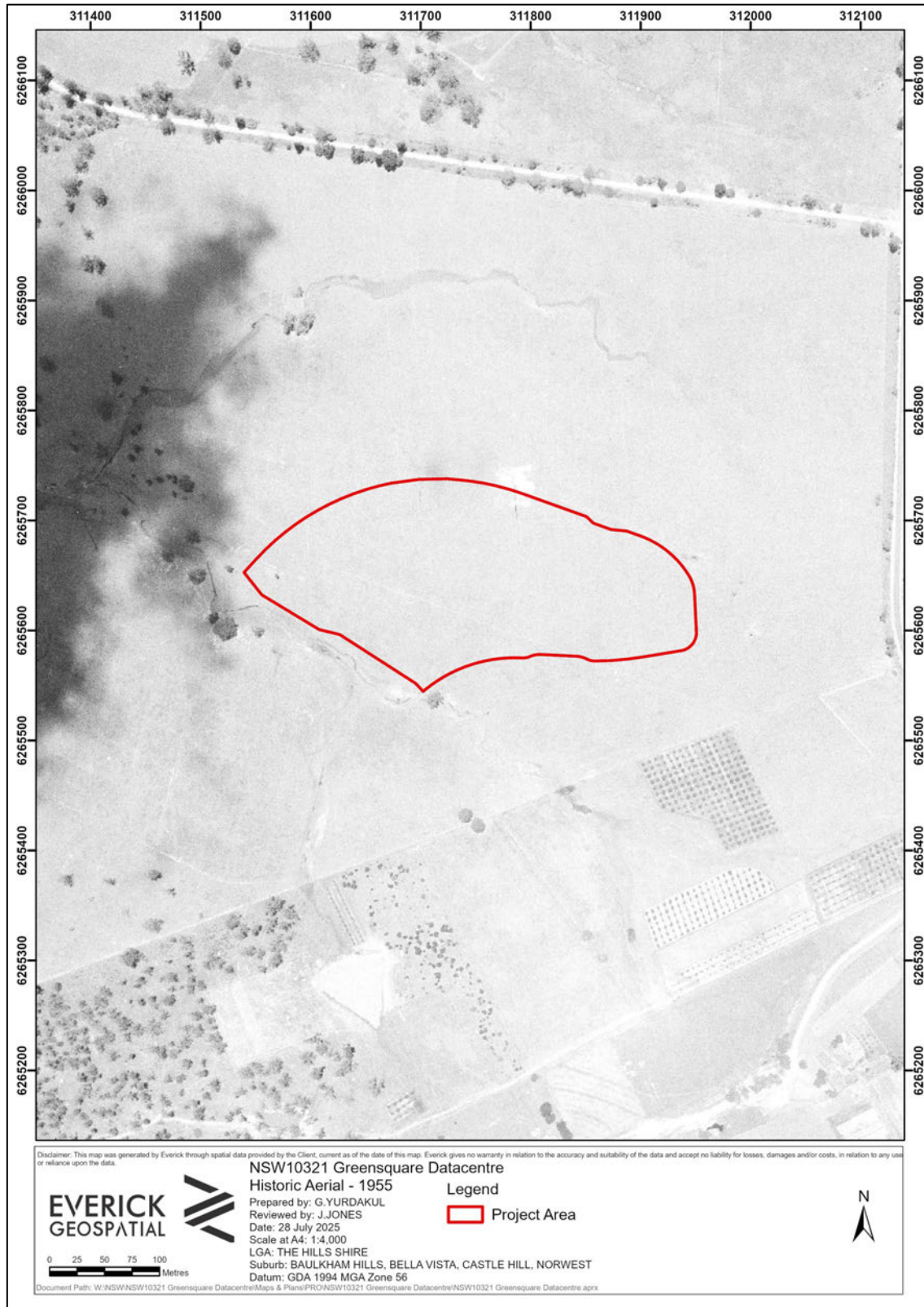


Figure 4-3: Historical aerial image of the Project Area (outlined in red), taken in 1955.
(Source: NSW Spatial Services)

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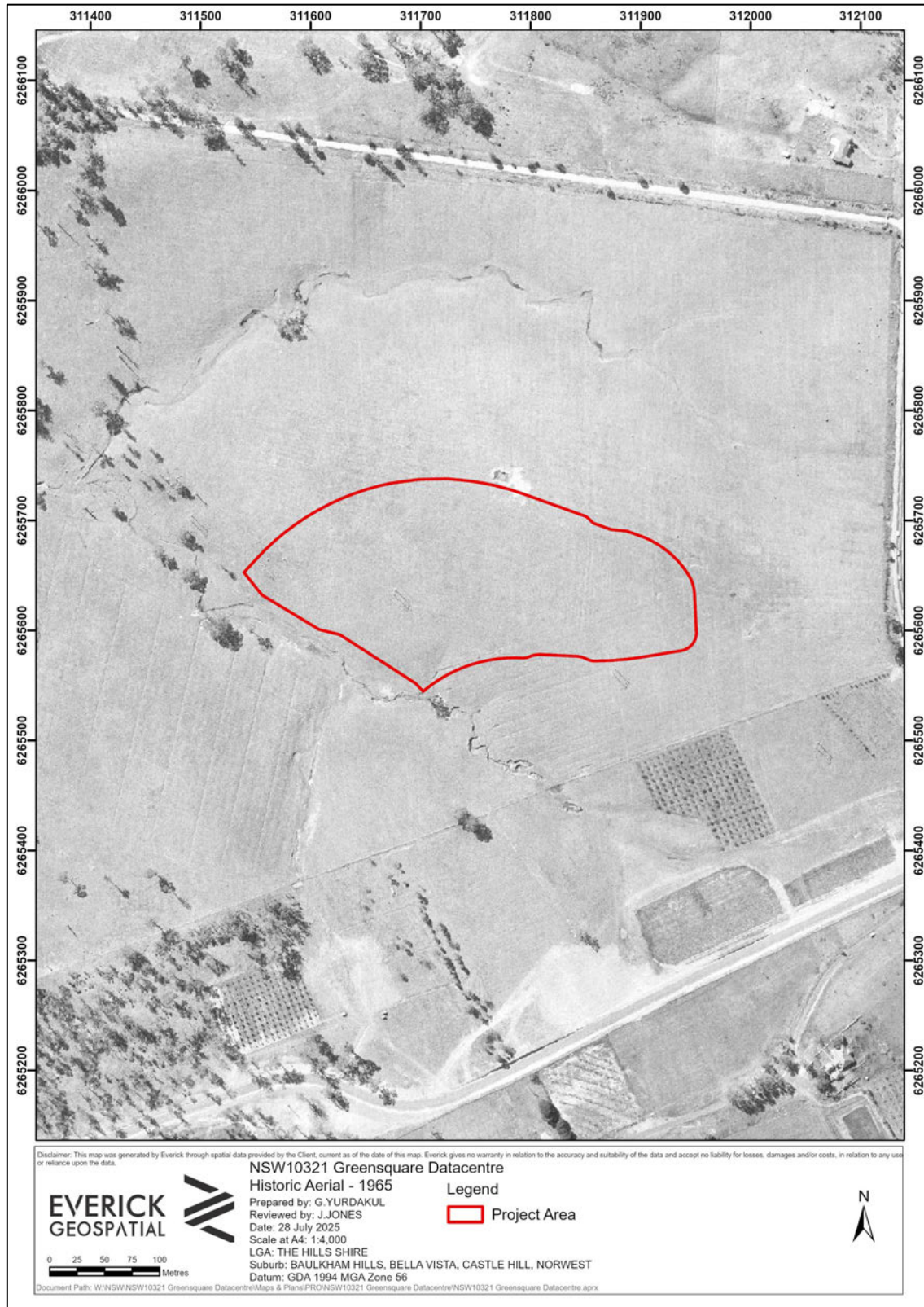


Figure 4-4: Historical aerial image of the Project Area (outlined in red), taken in 1965.
(Source: NSW Spatial Services)

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Figure 4-5: Historical aerial image of the Project Area (outlined in red). (Source: NSW Spatial Services)

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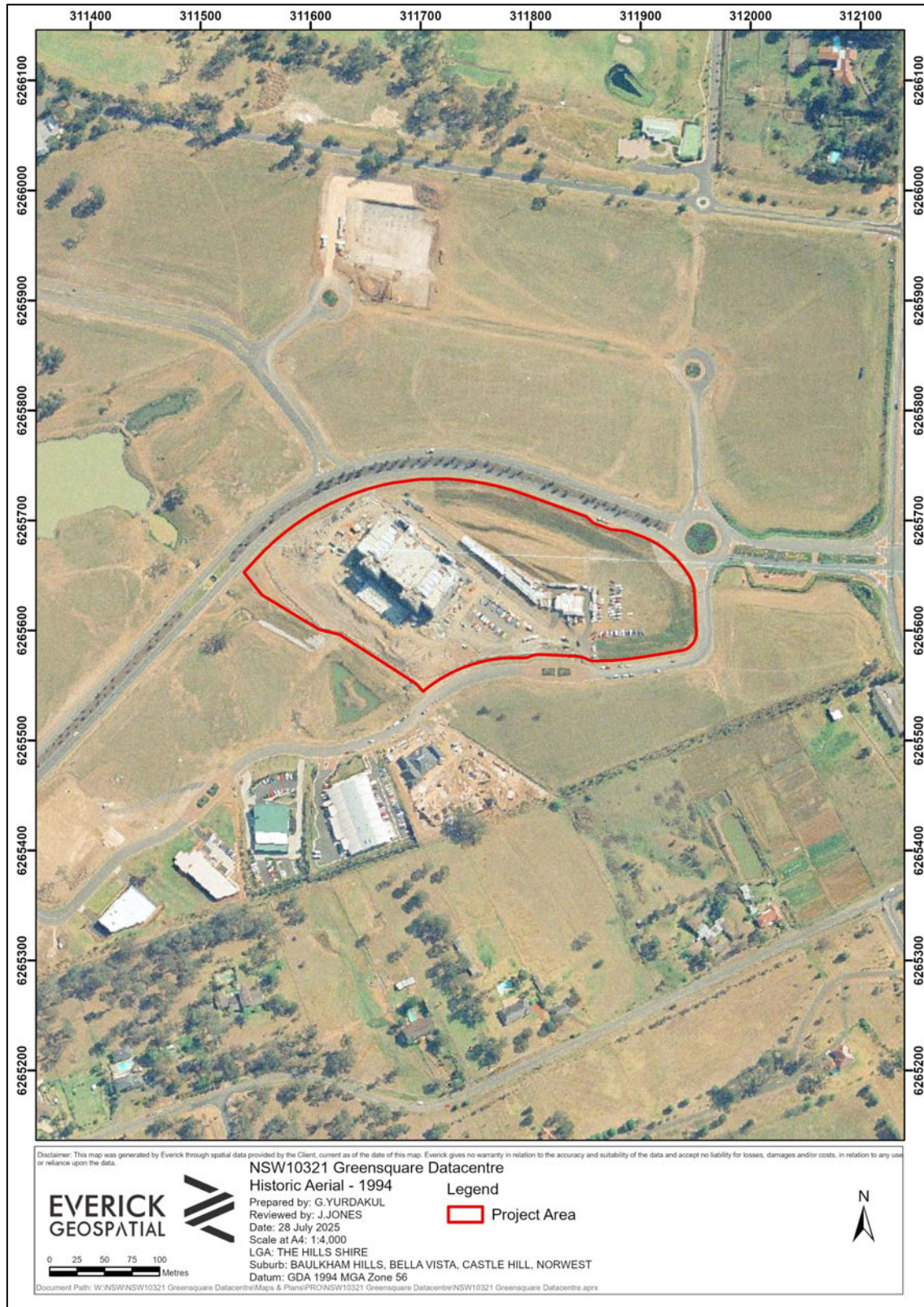


Figure 4-6: Historical aerial image of the Project Area (outlined in red), taken in 1994.
 (Source: NSW Spatial Services)

5. Ethnohistoric and Archaeological context

5.1. Ethnohistoric context

This ethnohistoric context provided here is, largely, limited to a literature review. Where comments have been received from RAPs as part of the consultation they have been integrated into this ethnohistory.

Terminology used regarding Aboriginal people and culture has varied both over time and geographically and terminology used in quotes provided here may not be considered appropriate in the modern context. In addition, different Aboriginal individuals and groups may prefer different terminology (e.g. clan, tribe etc.). Efforts have been made to ensure that the terminology used in this ethno-history is the preferred terminology of the Aboriginal groups being described.

Most information about the socio-cultural structure of Aboriginal societies comes after European contact and largely from ethnohistorical accounts. These accounts are inherently colonial in nature and suffer from the prejudices and biases of their time. Further these accounts are often intertwined with observations made after significant social disruption had already occurred following the arrival of colonial settlers. As a result, information surrounding traditional occupational boundaries and social structure are often contentious and restricted by limitations of both a physical and intentional manner. Boundaries between groups were likely far more diffuse than the arbitrary definitions applied by colonial observers and this must be taken into consideration when identifying and consulting traditional owners. Language groups are widely used to define the boundaries of Aboriginal groups, however as mentioned above this information is derived from post-contact colonial accounts and members of the Aboriginal community may have a divergent understanding of the boundaries of Country.

Clans based on patrilineal or matrilineal descent were the basic unit of pre-colonial Aboriginal society. These clans had defined territories and ritual and economic responsibilities to one another and within their respective systems. Clusters of neighbouring clans, which shared a standard dialect and family interests, distinguished themselves from other clusters using a language name (Tindale 1974).

The Dharug people lived in smaller groups, known as "clans," and in social or ritual groups referred to as "bands" (Attenbrow, 2010). The distinction between the two is that clans are typically smaller family groups. In contrast, bands are often not from the same clan but come together for ritual purposes or combined hunting and gathering activities (Attenbrow, 2010). Aboriginal people's boundaries were permeable, as fixed boundaries, such as rivers, were not evident in the landscape, and kinship ties extended across nations (Tench 1793).

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Early European settlers identified the Aboriginal people of the local area as part of the Dharug (also known as Darug or Dharruk) language group. The Dharug people inhabited the area bounded by Port Jackson and Botany Bay to the east, the Georges River to the south and southwest, the Hawkesbury River to the northwest, and as far west as the Blue Mountains. Three distinct dialects were noted, including the coastal (sometimes referred to as Eora), the hinterland (plains), and the mountains (Collins 1798; Tench 1793; Dawes 1790).

The location of the clan Country determined the resources available for exploitation. The Hawkesbury and Nepean Rivers were a significant resource and a focus of occupation for Aboriginal people. Yams were grown along the rich alluvial floodplain and formed an essential staple for the Dharug and Darkinjung people. The men hunted and fished while the women gathered fruits and dug up yams and fern roots. When women gathered yams, they often broke off the top part and reburied it to ensure it would be available again the following year (Attenbrow, 2010).

Various tools and weapons were used for hunting, gathering, preparing food resources, transporting materials, creating other helpful equipment, and for decorative purposes. Most objects were highly portable and very versatile, able to be used for various activities. Recorded items of material culture include hunting and fishing spear, spear-throwers (at least two types), fishing lines and hooks, stone axes and hatchets, digging sticks, clubs, shields, string and net bags, baskets, bark containers and canoes, scrapers, adzes and awls, animal skin cloaks and a variety of stone tools (Attenbrow A. 2010, Kohen 1986). Spears were commonly crafted from grass tree (*Xanthorrhoea*) stalks, tipped and barbed with worked stone flakes or bone (although shell was standard in coastal areas). Grass tree resin and gum from eucalypts were used to bind and fix these in place (Kass, Liston, & McClymont, 1996, p. 6). Spears, spear throwers, boomerangs, and shields were made from bark, timber, gums, and resins. Bird feathers, animal teeth, nuts, ochre, animal skins and plant fibres were used to create tools and decorative items, including clothing, cloaks and personal ornamentation. Leaves, bark and fibrous stems were used to make nets, bags, traps, baskets, string and rope.

Many of these objects were made from organic materials and as a result are unlikely to survive in the archaeological record. While organic material may be preserved where they are rapidly buried following burning or within waterlogged deposits, the majority of sites are unlikely to preserve organic material. The archaeological record, therefore, is dominated by stone artefacts which are far more likely to be preserved. Culturally modified trees were present throughout the landscape and served a wide range of purposes. European settlement has resulted in the clearance of many of the mature native trees however

Aboriginal people lived and moved throughout the landscape, traveling widely to access a range of resources. Therefore, Aboriginal sites and objects may be present on all landforms as objects were lost

or discarded while travelling. Larger and denser sites may be present where longer term occupation took place, such as campsites, typically located where good access to water was available. Longer term activity would also take focus on places where other resources were available, such as stone quarries.

The arrival of Europeans had a major impact on aboriginal people, causing significant social and economic upheaval. Contact with Europeans introduced diseases, such as smallpox, that drastically altered the size and structure of the Aboriginal population, whilst the expansion of settlements and establishment of farmland subsumed the traditional areas used to meet subsistence needs activities resulted in significant violence against Aboriginal communities (Attenbrow, 2010).

5.2. Archaeological Context

5.2.1.Database Searches

5.2.1.1.Aboriginal Heritage Information Management System (AHIMS)

The nature and location of Aboriginal sites can be culturally sensitive information and should only be made publicly available with the consent of the Aboriginal community, all AHIMS information must be redacted prior to release of this report to the public.

Caution should be taken when using the AHIMS database to reach conclusions about site prevalence or distribution. For example, a lack of sites in a given area should not be seen as evidence that the area was not occupied by Aboriginal people. It may simply be an indication that it has not been surveyed for cultural heritage, or that the surveys were undertaken in areas of poor surface visibility. Further to this, care needs to be taken when looking at the classification of sites. For example, the decision to classify a site an artefact scatter containing shell, rather than a midden can be a highly subjective exercise, the threshold for which may vary between archaeologists.

An extensive search (Client ID: 1024836) of the Heritage NSW AHIMS database was conducted on 17 July 2025 for the project area and its surrounds with the following coordinates:

GDA, Zone: 56,

Eastings: 308693.0 - 314693.0,

Northings: 6262647.0 - 6268647.0

As a result of the AHIMS search, 109 Aboriginal site listings were identified (see ATR, [Appendix D](#)). 20 of these sites are listed as partially or completely destroyed, where subsequently activity has impacted the sites. With a further three (3) listed as Not a Site or deleted, where further investigation determined there was no potential. There are seven sites located within 1 km of the Project Area (Figure 5-2).

Aboriginal sites on the AHIMS database are defined using a combination of, one or more, 'site features' taken from a list of 20 standard features (OEH 2012) (Table 5-1). Within the search area, six of these site types were found (Table 5-1), artefact is the most common site feature followed by Potential Aboriginal Deposits (PAD). A summary of the search results can be found in (Table 5-2).

Artefacts appear in 92 of the 109 (84.4 per cent) of recorded sites in the search area, both on their own and alongside other site types such as art or grinding grooves. Stone tools made up an important part of the Aboriginal toolset and were used widely for a range of purposes. In addition, stone tools are both resilient, they survive where organic objects do not, and widely recognisable by Aboriginal people and archaeologists. PADs are the second most common site type within the search area, appearing at 19 (17.4 per cent) of sites. PADs are locations where potential for subsurface Aboriginal objects has been identified, however further investigation is required to determine if Aboriginal objects are present.

A single Aboriginal burial is known 2.4 km to the southwest of the Project Area, in addition three Aboriginal resource gathering sites are known in the search area.

Table 5-1: AHIMS Site Features, from OEH 2012

Site features	Description
Aboriginal resource and gathering	Related to everyday activities such as food gathering, hunting, or collection and manufacture of materials and goods for use or trade. Notes: 1. This is not Aboriginal object and therefore not included in the legislative process. 2. Not to be used for fish trap, shell or stone quarry
Artefacts	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people.
Art	Art is found in shelters, overhangs and across rock formations. Techniques include painting, drawing, scratching, carving engraving, pitting, conjoining, abrading and the use of a range of binding agents and the use of natural pigments obtained from clays, charcoal and plants.
Grinding grooves	A groove in a rock surface resulting from manufacture of stone tools such as ground edge hatchets and spears, may also include rounded depressions resulting from grinding of seeds and grains.
Potential archaeological deposit (PAD)	An area where Aboriginal objects may occur below the ground surface. Note: This is not Aboriginal object and therefore not included in the legislative process unless accompanied by an object.
Burial	A traditional or contemporary (post-contact) burial of an Aboriginal person, which may occur outside designated cemeteries and may not be

Site features	Description
	marked, e.g. in caves, marked by stone cairns, in sand areas, along creek banks etc.

Table 5-2: Frequency of AHIMS Site Features within the search area.

Site feature	Number	Percentage
Aboriginal Resource and Gathering	3	2.75%
Artefact	78	71.56%
Artefact, Art (Pigment or Engraved)	1	0.92%
Artefact, Grinding Groove	3	2.75%
Artefact, Potential Archaeological Deposit (PAD)	10	9.17%
Burial	1	0.92%
Grinding Groove	5	4.59%
Potential Archaeological Deposit (PAD)	9	8.26%
Total	109	100

Redacted

Figure 5-1: Overview of AHIMS sites within search area.

Redacted

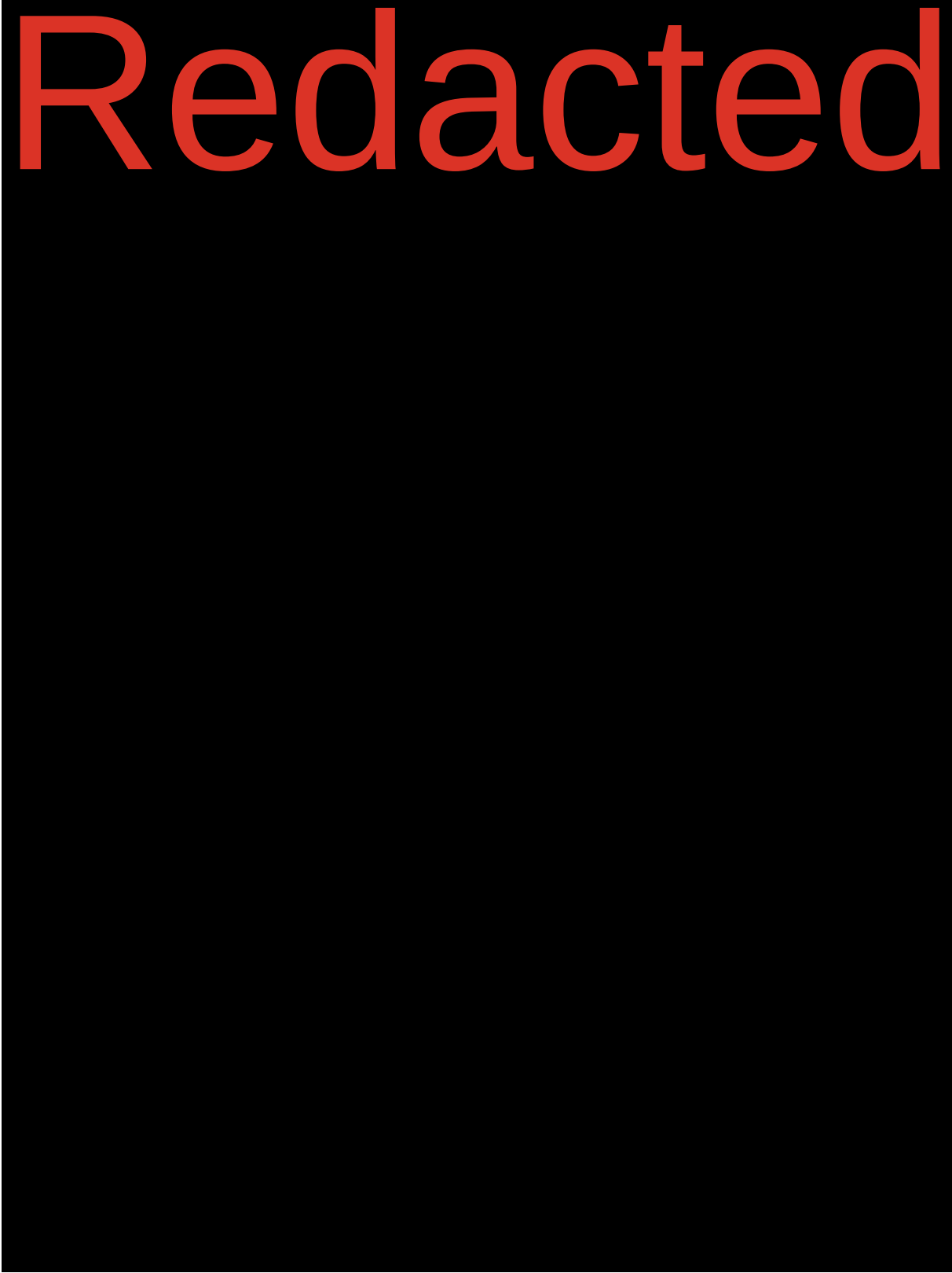


Figure 5-2: Distribution of AHIMS sites.

5.2.1.2. Other Database Searches

A search of the following statutory listings and databases was undertaken on 22 April 2025:

- Aboriginal Heritage Impact Permit (AHIP) Register
- Native Title Register
- World Heritage List / buffer zone
- National Heritage List
- Commonwealth Heritage List
- State Heritage Register
- The Hills Local Environmental Plan 2019

Table 5-3: Statutory listings and databases in or within vicinity of Project Area

Statutory list or database	Listed (Y/N)	Item name	Listing number
Aboriginal Heritage Impact Permit (AHIP) Register	Y	47 Spurway Drive, Baulkham Hills	AHIP ID: C0003203
Native Title Register	N	No items identified	N/A
World Heritage List / buffer zone	N	No items identified	N/A
National Heritage List	N	No items identified	N/A
Commonwealth Heritage List	N	No items identified	N/A
State Heritage Register	N	No items identified	N/A
	Y	St Joseph's Novitate	I7
Hills Shire Local Environmental Plan 2019	Y	Avenue of trees leading to Castle Hill Country	I25
	Y	Windsor Road from Baulkham Hills to Box Hill	I28

The Project Area was not found to be located in or within the vicinity of with any items identified in the above lists and databases.

Three heritage items listed on the LEP are located within 500m of the Project Area. However, none are present within the Project Area, and the State Heritage Inventory does not include any statement of significance for these items.

5.3. Previous Investigations

5.3.1. Regional Studies

The Cumberland Plain region of Western Sydney is one of the most studied regions in urban Australia, and there are in excess of seven thousand sites registered within the region. Over half of the sites are artefact sites (artefact scatters or isolated finds), with Potential Archaeological Deposits (PAD) the next most common feature, followed by axe grinding grooves and then other undefined site types including quarries, non-human bone and shell (AHIMS 2015: 27). This record matches the frequency of sites.

A large scale regional archaeological study of the Cumberland Plain was undertaken in the mid-1980s by Kohen (1985), which found that proximity to water was one of the most defining factors in site location and density of surface artefact sites in the region. More than 65 per cent of surface artefact scatters were located within 100 m of a source of permanent fresh water and only eight per cent of sites were greater than 500 m from a source of water.

The Rouse Hill Development Area (RHDA) located 8 km northwest of the Project Area, consisted of systematic test excavations of the open landscape, as a result a comprehensive predictive model was developed which has subsequently been applied widely across the Cumberland Plain. The assessment concluded that the whole of the RHDA was a cultural landscape, however the distribution of Aboriginal objects was found to be impacted by a number of factors.

White and McDonald (2010) produced a predictive model and desktop assessment which has been the basis of much of the subsequent archaeological research in the Cumberland Plain. The model can broadly be summarised as follows:

5.3.1.1. Stream order and distance to water

Water supply is considered a significant factor in the distribution of Aboriginal sites, with higher stream orders associated with both higher numbers and densities of Aboriginal sites. Sites were most often found within 50-100m of 4th order creeks, and within 50m of lower stream orders.

5.3.1.2. Landform

Aboriginal objects were identified on all landforms. The lowest density was found on the upper slopes and ridgelines, with the highest density found on terraces. Mid slopes and creek flats featured a moderate density.

5.3.1.3. Aspect

Aspect was found to have an impact on the distribution of sites on lower slopes, with higher densities on north and northeast facing slopes. No impact was found on the distribution of sites on upper slopes. Proximity to Silcrete Sources. Two major sources of silcrete were identified within the RHDA, at Plumpton Ridge and Crown Street, Riverstone. The assessment found that distance to known silcrete sources had little influence on the distribution of Aboriginal objects and it was anticipated that other silcrete sources may also be influencing distribution and obscuring the impact. Subsequent investigations identified low quality silcrete was present on ridgelines and paleochannels throughout the Cumberland Plain (Doelman et.al 2015).

5.3.2. Helen Brayshaw Heritage Consultants 2004, Town Centre Norwest Business Park Baulkham Hills LGA, Aboriginal Heritage Assessment

Helen Brayshaw Heritage Consultants (HBHC) undertook Archaeological investigation of a block of land in Baulkham Hills LGA (HBHC 2004), 150 m northwest of the Project Area. Small Creek crosses south to north in the centre of the study area. Based on previous assessments and preliminary research, Helen Brayshaw Heritage Consultants developed the following predictive statements:

First order creeks (headwaters of upper tributaries): Archaeological evidence expected to be sparse. Likely to represent background scatter only

- Second order creeks (middle reaches of minor tributaries): Archaeological evidence may occur as sparse but focused activity Examples include one-off camp sites or single-episode knapping floors
- Third order creeks (lower reaches of tributary creeks): Greater potential for frequent occupation and evidence may include repeated use by small groups. Likely to find reused knapping floors and more concentrated activity areas
- Fourth order creeks (major creek lines, e.g. lower reaches of Caddies and Second Ponds Creeks): High potential for permanent or repeated occupation. Sites may be complex and possibly stratified
- Creek junctions (confluences of watercourses): Likely foci for site activity. The size of the junction (stream ranking node) may influence the scale and nature of occupation

The assessment found that the majority of the study area had been disturbed however eight (8) Aboriginal objects were identified at four locations within a highly disturbed context. This demonstrated the potential for Aboriginal objects to be present in close proximity to creek lines despite disturbance. This highlights potential within the Project Area due to the proximity of Strangers Creek.

5.3.1. Archaeological & Heritage Management Solutions Pty Ltd 2006, Spurway Drive Development, Baulkham Hills, NSW – Aboriginal Heritage Assessment

Archaeological & Heritage Management Solutions Pty Ltd (AHMS) undertook an archaeological assessment for a proposed residential development approximately 270 m north of the Project Area. The assessment resulted in a predictive model which identified that:

- Open artefact scatter sites across all landforms within the study area where original A-horizon topsoils and/ or alluvium is present. The integrity of stone artefact deposits will depend on the degree of disturbance of original topsoils caused by erosion and agricultural activities;
- Scarred or carved trees may be present
- Isolated finds can occur anywhere in the landscape.

The study areas is located on the Blacktown and Luddenham soil profiles bordering Strangers Creek in a highly disturbed context similar to the Project Area.

The survey results indicated that there was low ground surface visibility during the survey and more than 95 per cent of the study area was covered in grass and suburban development. Therefore, it was not adequate to make meaningful conclusions about the presence or absence of surface artefacts and sites.

Although the survey was limited by low GSV, the findings still suggest a low likelihood of intact deposits, particularly given the high level of disturbance in the Project Area where surface visibility is similarly constrained.

Comparable conditions exist within the Project Area, with previous disturbance restricting surface visibility and reducing the potential for intact subsurface archaeological material.

No Aboriginal sites or objects were identified within the study area. No scars were observed on mature trees within the study area.

5.3.2.GML 2015, Showground Station Precinct, Castlehill. Aboriginal Cultural Heritage Assessment

SJB Planning engaged GML Heritage on behalf of the NSW Department of Planning and Environment to prepare an Aboriginal Heritage Assessment report for the proposed Showground Station Precinct. The study area is approximately 1.7 km northwest of the Project Area within the Blacktown soil profile. A desktop assessment was completed with the results presented below:

Based on previous assessments and preliminary research, the following predictive statements were developed:

- Average artefact densities are highest within 100 m of a creek. Between 100 m and 200 m from the creek, higher artefact densities are generally found in clusters associated with discreet knapping floors (stone tool manufacture sites) amidst much lower density background artefact scatter.
- Grinding grooves can be found on landforms associated with the creek.
- Based on the highest artefact and site densities, lower to mid-slope landforms approximately 200 m from the creek with a northerly and northeasterly aspect were preferred occupation locations for Aboriginal people.
- Artefact densities decline with distances over 200 m from the creek, and in all low-lying areas adjacent to the creek, there are generally only low average artefact densities.
- Most stone artefacts are made from silcrete.
- Some sites can show specialisation, and the variety of activities undertaken between adjacent sites is apparent.

The desktop report identified that the Precinct contains one known Aboriginal site and another on the Precinct boundary. Eighteen Aboriginal sites are registered within 1 km of the study area. Based on previous investigations, including a search of the NSW Aboriginal Heritage Information Management System (AHIMS) and an analysis of the local environment, it was determined that the Precinct could contain unrecorded Aboriginal heritage sites. It is most likely that such sites will be open campsites, artefact concentrations, and/or isolated finds. These may be found anywhere within the Precinct as part of the typical Aboriginal archaeological signature present on the Cumberland Plain, often concentrated on slightly sloping to level ground, usually within 100 to 200 m of a watercourse.

The results of field surveys and test excavations in these previous study areas show that the likelihood of previously unknown sites being disturbed by proposed works is extremely low. This is due to the nature

and extent of these disturbances in the topsoil levels. Locations disturbed through ground excavation works are unlikely to have any intact Aboriginal archaeological deposits.

The Project Area has been subject to the same levels of disturbance, thereby reducing the likelihood of intact archaeological deposits being present.

5.3.3. Everick Heritage 2025, Mixed-Use Residential Flat Development, Castlehill, NSW – Aboriginal Cultural Heritage Assessment

Alton Property Group engaged Everick Heritage to prepare an Aboriginal Cultural Heritage Assessment report for the proposed Mixed-Use Residential Flat Development in Castle Hill. The study area is approximately 3 km southeast of the Project Area.

Based on previous assessments and preliminary research, the following predictive statements were developed:

- Stream order and proximity to water sources are the primary determinants of the complexity of archaeological sites
- Artefact sites with high densities (>100 artefacts per site) are more likely to be associated with large permanent watercourses, such as the Nepean and Parramatta Rivers
- Lower-density scatters, or artefacts redeposited by erosion and water discharge, may be reburied in fluvial sediments.
- Artefact sites may predominantly comprise silcrete and chert, typically located in low-lying areas adjacent to the creeks.

The desktop assessment found that the Project Area had been heavily disturbed and that there were no sites within 1 km of the Project Area.

A survey of the Project Area confirmed the findings of the desktop assessment, which found that the majority of the area has been heavily impacted by prior residential development and subsequent demolition. No Aboriginal sites, potential archaeological deposits (PADs), or archaeologically sensitive landforms were identified during the survey.

Given the proximity and comparable soil landscape and a similar history of land disturbance, these findings reinforce that the Project area is unlikely to retain Aboriginal archaeological deposits.

5.4. Summary and predictive model

The predictive model developed for this assessment relies on the known distribution of Aboriginal sites across the broader region, established archaeological research, and local environmental features within and surrounding the Project Area. Previous archaeological investigations in similar landscape settings have shown that proximity to watercourses is the most consistent factor influencing the density and distribution of Aboriginal sites. Other key factors affecting the location and preservation of cultural materials include post-depositional processes such as erosion, sediment scalding, and water movement.

The model for the Project Area is founded on the following lines of evidence:

- Known site distribution and their relationship to the landforms within the Project Area;
- Consideration of site types, raw material availability, and artefact densities likely to be encountered;
- Ethnohistorical accounts concerning Aboriginal use of the local landscape, which may correspond to material traces;
- The presence (or probable past presence) of natural resources that could have supported cultural activities;
- Spatial and temporal patterns observed in the broader archaeological record, relevant to the Project Area and surrounding region.

For the purposes of this assessment, the archaeological sensitivity and potential of the Project Area are considered related but separate concepts.

Archaeological sensitivity relates to landforms and environmental features linked with Aboriginal use and occupation, such as high ridgelines, nearby water sources, and ecological richness. This is evaluated based on criteria described in Section 8 of the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (DECCW 2010a:12). Sensitivity is categorised on a scale from Low to High.

Archaeological potential indicates the likelihood of finding Aboriginal cultural material at a site, considering both landform sensitivity and any current or past disturbances to the ground surface and subsurface layers. It is assessed on a graded scale from Low to High, based on desktop research and visual inspection findings.

The Project Area is predicted to be of low to moderate sensitivity due to its proximity to Strangers Creek and location on slightly elevated flats in the Cumberland Plain; however, due to the extensive prior disturbance, including earthworks, infrastructure development, and landscape modification for the

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construction of surrounding roads, it is assessed as having low archaeological potential, with no likelihood of intact Aboriginal cultural heritage sites being present. A summary of the predicted site types and their expected occurrence within the Project Area is provided in Table 5-4.

Table 5-4: Predicted site types and their predicted presence

Site Type	Description & Predictive Statement	Predicted Presence
Artefact Scatters / Isolated Finds	The most likely site types to occur within the Project Area are artefact scatters. Silcrete and chert are the raw materials most likely to be encountered in association with higher order streams and elevated landforms Given the extent to which the Subject Area had previously been disturbed, it was considered that there is low to moderate potential for artefact scatters to be present across the majority of the Subject Area	Low to moderate
Potential Archaeological Deposits (PADs)	In areas where A horizon soils have been removed or substantially disturbed by erosion it is unlikely that sub-surface deposits remain	Low
Grinding Grooves	Unlikely to occur in the Project Area due to lack of suitable rock outcrops	Low
Shell Middens	Less likely due to the previous land disturbance	Low
Culturally Modified Trees (CMTs)	Scarred and carved trees would not be expected in areas where land clearance has resulted in the removal of old growth trees	Low

Further detail supporting this model is provided in ATR ([Appendix D](#)).

6. Archaeological survey

The primary aims of the survey were to:

- Examine all landscape features that will potentially be impacted by the proposed works, identifying areas of archaeological potential in accordance with the predictive model.
- Identify and record Aboriginal sites, objects and areas of potential archaeological deposit (PAD) within the Project Area.
- Verify if the Project Area contained areas of ground disturbance and map the extent and nature of that disturbance.
- Consult with the RAPs with regard to any management measures required for mitigation of impact to Aboriginal sites or objects.

The archaeological survey of the Project Area was carried out on foot in a single day on 1 August 2025 by Jason Giang (Senior Archaeologist) and Matthew Hedges (Graduate Archaeologists at Everick Heritage, alongside Aboriginal Cultural Representatives of the Deerubbin Local Aboriginal Land Council (DLALC). Table 6-1 provides details of the survey participants.

Table 6-1: Survey personnel

Name	Organisation	Role
Jason Giang	Everick Heritage	Specialist Archaeologist – Team Lead
Matthew Hedges	Everick Heritage	Graduate Archaeologist
Steven Knight	Deerubbin LALC	Aboriginal Cultural Representative
Nathan Donovan	Deerubbin LALC	Aboriginal Cultural Representative

6.1. Results

The archaeological survey confirmed that no Aboriginal sites, objects, or culturally modified trees were present within the Project Area (Figure 6-1). All trees were determined to have been planted after the establishment of the data centre in the 1990s. Across the site, significant disturbance was evident, with widespread terracing, levelling, and artificial ground surfaces associated with previous construction and landscaping works (Figure 6-2, Figure 6-3, Figure 6-4). Strangers Creek was also identified as a heavily modified feature, having been channelled and altered with the addition of a fountain (Figure 6-5).

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Ground visibility was generally poor (less than 10%) due to grass cover and landscaping. Small exposures, particularly within Survey Unit SU-01, revealed disturbed soil horizons containing silty clays mottled with darker material and inclusions of brick, concrete, shale, and sandstone, consistent with earthworks from site preparation. Recent geotechnical pits also exposed disturbed deposits, and scattered stone fragments found nearby were in close association with construction debris rather than representing intact surfaces.

Additional exposures along terraces and boundary plantings further confirmed the extent of disturbance. Soils in these areas contained mixed natural and introduced material, including shale, sandstone, ironstone, and modern debris. Historical aerial photographs and field observations together demonstrate that terracing, slope modification, and boundary planting all post-date the 1990s construction phase. Modern refuse, pitting, and animal burrows were observed in several locations, reinforcing that no areas of Potential Archaeological Deposit (PAD) remain intact.

In summary, the Project Area has been comprehensively modified through previous construction, landscaping, and maintenance activities, leaving no potential for intact Aboriginal archaeological deposits.

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Figure 6-1: Survey map showing the survey tracks and the areas of SU-01 and SU-02.

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Table 6-2: Photographic evidence

Photograph	Description
	Figure 6-2: View across the terrace to the north of the data centre building. Located within SU-02, facing east.
	Figure 6-3: View across the carpark and up the slope to the terracing to the north of the data centre building. Located in SU-01 and SU-02, facing north.
	Figure 6-4: View across the slope and terracing to the north of the data centre building. Located within SU-01, facing east.

Photograph	Description
	Figure 6-5: Evidence of modification of Strangers Creek, including terracing of the banks of the watercourse to formalise the channel. Located within SU-01, facing southwest.

6.2. Discussion

The entirety of the Project Area was found to have been subjected to a high degree of historical ground disturbance, including earthmoving to terrace and level the site for the construction of the data centre building, carparks and associated landscaping. Modification of the ground surface were identified to be comprehensive, and it was not considered likely that natural soils were present anywhere within the Project Area boundary.

No Aboriginal Sites or Objects were identified during the survey. Whilst a number of large trees were observed within the Project Area, past land clearing practices reduce the likelihood of occurrence of culturally modified trees, and no signs of cultural modification were identified.

As a result of the survey, it has been determined that no further test excavations are required due to the extensive ground disturbance identified across the Project Area. Evidence of terracing and levelling was observed throughout, indicating significant landscape modification. Additionally, no permanent water source was identified within the Project Area. Strangers Creek, located nearby, has undergone substantial modification, including formalisation of the channel and the installation of a fountain, further reducing the area's archaeological potential.

7. Cultural values assessment

7.1. Cultural landscapes

Cultural landscapes are defined as:

A place or area valued by an Aboriginal group (or groups) because of their long and complex relationship with that land. It expresses their unity with the natural and spiritual environment. It embodies their traditional knowledge of spirits, places, land uses, and ecology. (US/ICOMOS 1996 in Andrews et al 2006).

Andrews et al (2006) suggest the following guiding principles for evaluating Aboriginal cultural landscapes.

- The long associated Aboriginal group or groups have participated in the identification of the place and its significance, through the consultation process. This principle ensures that Aboriginal peoples will be consulted, involved and participate in the identification of frameworks and sites.
- Spiritual, cultural, economic, social and environmental aspects of the group's long attachment with the identified place, including continuity of use and traditions, social and kinship relationships, intimate knowledge of the area, and spiritual affiliations illustrate its cultural value.
- The interrelated cultural and natural attributes of the identified place make it a valued cultural landscape. Recognising the integrated nature of Aboriginal relationship to place, including the inseparability of cultural and natural values. Tangible evidence may be largely absent, with the attributes primarily in oral and spiritual traditions and in activities related to the place. However, there could be tangible attributes which include natural resources, archaeological sites, burials/graves, material culture, and written or oral records.
- This guiding principle also recognises natural components such as ecosystem, climate, geology, topography, water, soils, views, and dominant and culturally significant fauna and flora in the context of the associated Aboriginal people's relationship to the place.
- The cultural and natural attributes that embody the significance of the place are identified through traditional knowledge of the associated Aboriginal group(s) including traditional environmental knowledge, narratives, place names, language, traditional uses, rituals, and behaviour related to the identified place. It recognises that some knowledge cannot be shared, but available knowledge must be sufficient to demonstrate the significance of the place in the culture of the associated group.
- The cultural and natural attributes that embody the significance of the place may be additionally understood through academic studies such as histories, including oral history and ethno-history, archaeology, anthropology, and environmental sciences.

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.

It is acknowledged that Aboriginal people are the primary determinants of the cultural significance of Aboriginal cultural heritage. In addition to the outlined heritage values above, it is important to consider all cultural heritage within a cultural landscape that moves away from a site-based approach which manages cultural sites in a spatially separate way which need to be managed separately, rather than an interconnected network between nature and people, the past and the present and places and their value (DECCW 2010c).

7.2. Methodology

The cultural assessment in this report includes information collected through academic research and consultation during the test excavation and through the consultation period for the RAP review. This information was collected by Jason Giang (Specialist Archaeologist – Team Lead, Everick Heritage) Matthew Hedges (Graduate Archaeologist) and Amber Hewson (Archaeologist).

7.3. Identified Aboriginal cultural heritage values

Aboriginal people have a deep and rich connection to Country, this may take the form of intangible cultural values, however no specific cultural values have been identified associated with the Project Area. Despite this Aboriginal people have, and continue, to live throughout the local area, and recognise the general cultural significance of Country as a whole. The Project Area has been identified as significantly disturbed due to extensive alterations from prior residential development and demolition activities. The area is not in proximity to any watercourses or landscapes that would typically indicate higher potential for Aboriginal cultural heritage values. As such, the likelihood of encountering Aboriginal sites or objects within the Project Area is low. Nonetheless, engaging with the RAP representatives during the review stage is necessary to gather their insights and traditional knowledge, which may contribute to a more comprehensive understanding of the Project Area's cultural significance.

Although no Aboriginal objects or sites were identified within the Project Area during the current assessment, its proximity to recognised culturally significant places emphasises the potential for the area to be part of a broader cultural landscape. Therefore, consideration should be given to the cultural sensitivity of the area in future land use planning and management.

8. Significance assessment

8.1. 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 for identification and assessment of cultural significance assessment with reference to the *Burra Charter: The Australian ICOMOS Charter for Places of Cultural Significance* (Australia ICOMOS 2013) (the Burra Charter) and the NSW Heritage Office guidelines (2001):

- 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. Information about scientific values will be gathered through archaeological investigation.
- Aesthetic values – is the area important in demonstrating aesthetic characteristics in the local and/or region and/or state.

8.2. Scientific significance

Scientific significance measures a site's potential to provide information that enhances understanding of the Aboriginal past. It is evaluated based on four sub-criteria: research potential, representativeness, rarity, and educational value (OEH 2011; ICOMOS 2013).

No Aboriginal objects or places have been identified within the Project Area, which has been assessed as having low archaeological potential and sensitivity and is of no scientific significance (Table 8-1).

Table 8-1: Summary of scientific significance

Site name (AHIMS ID)	Research value	Education potential	Representative value	Rarity	Overall scientific significance
N/A	None	None	None	None	None

8.3. Social significance assessment

Social or cultural values relates to the cultural values assessment outlined in Section 7. All assessments of heritage values will have a social or historic context. Therefore, all potential heritage values will have a social component.

Despite conducting consultations and surveys, including outreach to RAPs, no direct feedback indicates that the Project Area holds no particular social or cultural values. However, this absence of direct input does not negate the potential significance of the site, especially when considered within the broader cultural context. The Norwest area is situated within a region recognised for its cultural importance to Aboriginal people, particularly due to its historical ties to traditional land use and the surrounding landscape.

A fundamental aspect of Aboriginal heritage is the concept of the 'cultural landscape,' which encompasses the interconnectedness of land, natural resources, and places of historical and spiritual significance. This notion underscores the cultural values inherent in the broader region, even when specific sites do not have documented social or cultural recognition.

Although the AHIMS search did not reveal any registered Aboriginal sites within the immediate vicinity of the Project Area, the historical context suggests that Aboriginal communities once used the region. The absence of identified heritage sites does not diminish the potential for underlying social and cultural significance related to the area's broader landscape.

Ongoing engagement with the Aboriginal community remains vital to ensure their perspectives and values are respected and integrated into future assessments. Continued consultation may yield further insights into the Project Area's social and cultural significance. It is important to acknowledge that while the results of archaeological investigations may currently reflect low archaeological significance, it may still embody high cultural significance to local Aboriginal communities, serving as a testament to their enduring connection to the land.

8.4. Historic significance assessment

The Project Area is not known to hold historical significance to the local Aboriginal community. A review of available historical records indicates that no Aboriginal fringe camps, missions, or reserves are documented within the Project Area.

8.5. Aesthetic significance assessment

The Project Area has been extensively modified through vegetation clearance, carpark and development resulting in the loss of its natural visual and sensory qualities. While a small amount of green space remains, views are limited and screened by existing buildings and fencing. Overall, the disturbed nature of the landscape means the Project Area does not retain aesthetic values or the potential for their loss.

8.6. Summary statement of significance

The Project Area, located within the Cumberland Plain, has been assessed for its Aboriginal cultural heritage significance. Despite extensive surveying efforts, the area is not known to hold specific Aboriginal cultural values nor exhibit direct evidence of Aboriginal sites or artefacts. Significant historical disturbances resulting from prior development activities have compromised the landscape's integrity, limiting the area's archaeological potential.

While no immediate Aboriginal cultural or social significance has been identified for the Project Area, its broader context within the Cumberland Plain underscores its potential relevance to local Aboriginal communities. The Cumberland Plain is recognised for its social importance to Aboriginal peoples, who have long inhabited and utilised these landscapes. Additionally, no specific cultural values were identified through community consultation.

In summary, the Project Area is assessed to possess low archaeological significance due to extensive prior disturbance; however, its location within the culturally rich Cumberland Plain implies a potential for broader cultural values that merit further consideration through ongoing engagement with the Aboriginal community.

9. Impact assessment

9.1. Summary of impacts

The proposed development will involve extensive ground disturbance associated with earthworks, demolition of existing dwellings, and the removal of original topsoils to establish building footprints. Works will also include construction of a three-storey data centre, ancillary office and amenity facilities, loading docks, on-site car parking, and associated civil works and utilities such as sewerage, electrical services, water infrastructure and a fuel storage facility. Landscaping and offset tree planting are also proposed.

These activities will permanently alter the existing land surface and character of the Project Area. However, the desktop assessment and archaeological survey did not identify any Aboriginal objects or sites within the Project Area. It is therefore anticipated that the development is unlikely to result in impacts to Aboriginal objects, sites, or Aboriginal cultural values specific to the Project Area.

9.2. Ecologically sustainable development principles

The *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011) specifies that Ecologically 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 EPBC Act:

- 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).
- The conservation of biological diversity and ecological integrity should be a fundamental consideration in decision making (Conservation of Biodiversity).
- Improved valuation, pricing and incentive mechanisms should be promoted (Improved Valuation, Pricing and Incentive).

Office of Environment and Heritage (OEH 2011: 13) states that consideration of these principles should result in:

- An understanding of the cumulative impact of the proposal on Aboriginal objects or places in relation to other identified sites in the region.
- Ascertaining how wherever possible or practicable harm to significant Aboriginal objects or places can be avoided.
- Establishing and assessing the risks and consequences of various options.
- Assessing the costs and benefits of various options for future generations.
- Suggesting actions proposed to help promote intergenerational equality

9.2.1. The Integration Principle

The Aboriginal heritage values of the Project Area and its place within the surrounding landscape have been fully considered in the ATR ([Appendix D](#)) and this ACHAR. These values have been considered in the planning and approvals process for the Project Area and, therefore, comply with the integration principle by considering long-term and short-term environmental and social effects.

9.2.2. The Precautionary Principle

A combination of background research (including review of historic land use, available geomorphic data and previous archaeological research), archaeological survey, and consultation has been undertaken as a part of the ACHAR. This research has allowed for a thorough investigation of the scientific and cultural qualities of the Project Area. As a consequence, the recommendations and conclusions of this assessment are thereby based on thorough scientific investigation ([Appendix D](#)).

9.2.3. The Principle of Intergenerational Equity

The principle of intergenerational equity has been investigated through the preparation of this ACHAR. The ACHAR has identified that no Aboriginal objects or potential archaeological deposits will be impacted by the proposed works. Furthermore, the Project Area is unlikely to retain intangible cultural value as the Project Area is located in a highly urbanised and developed location. The implementation of Aboriginal-led design options is one of the recommendations of this ACHAR. This would serve to enhance the potential for future generations to connect with Aboriginal culture to a greater degree than the current status of the Project Area.

9.2.4. Conservation of Biodiversity

Cultural values associated with biodiversity are interwoven with the lives of Aboriginal people and their use of the landscape. The proposed works are being undertaken in consideration of impacts to the local environment.

9.2.5. Summary statement of ecologically sustainable principles

The likelihood of impact from the project on Aboriginal objects or places is extremely low. No Aboriginal objects or sites have been identified within the Project Area that will be subject to harm. This assessment of the Project Area is founded on thorough scientific research completed as a part of this ACHAR. The Project may potentially result in the enhancement of intergenerational equity in terms of connection with Aboriginal culture through the implementation of Aboriginal-led design.

9.3. Cumulative impact

A cumulative impact is the combined effects of environmental or social impacts that occur because of a range of activities or developments within a particular local area or region that impact on Aboriginal cultural heritage. Ideally cumulative impacts should be assessed from a baseline of data relating to the incremental impact of the actions of a development when added to other past, present and reasonably foreseeable future impacts.

The proposed development will not contribute to a cumulative impact on Aboriginal Cultural Heritage. The Project Area is of low archaeological potential, and no Aboriginal sites or objects were identified during the assessment. As such, when considered alongside previous and anticipated developments in the surrounding area, the proposed works are unlikely to result in a cumulative loss or degradation of Aboriginal heritage values. Ongoing application of the Unexpected Finds Protocol will further mitigate any residual risk.

10. Recommendations

10.1. Guiding principles

The overall guiding principle for cultural heritage management is that where possible, Aboriginal sites should be conserved. If conservation is not practicable, measures should be taken to mitigate impacts to Aboriginal sites. Conservation through avoidance of Aboriginal sites can be achieved through such measures as:

- Design change
- Buffering and exclusion zones
- Construction Environmental Management Plans which include Aboriginal heritage
- Cultural heritage awareness training.

This ACHAR has fully addressed requirement 19 of the SEARs.

10.2. No further investigation

This ACHAR has identified that the Project Area is of low archaeological potential. Further to this, no specific cultural values associated with this site have been identified. On this basis, the proposed works can proceed without any further archaeological investigation.

10.3. Unexpected Finds Procedure

Unexpected Aboriginal objects remain protected under the NPW Act. An Unexpected Finds Protocol (UFP) must be used, to manage unexpected Aboriginal objects, including previously unknown sites and Aboriginal object (Appendix E – Unexpected Finds Procedure).

- Works in the vicinity of the potential find must be halted
- An exclusion zone of 10m established around the potential object
- The Heritage Consultant and RAPs must be informed and assess the find.
- If it is determined that no Aboriginal site is present, or impacts can be avoided works may proceed with caution.
- If Aboriginal objects are present, and impacts cannot be avoided, appropriate mitigation measures must be established in consultation with RAPs
- Heritage NSW and the RAPs must be informed of all unexpected finds,

- If an Aboriginal site is identified a site card must be prepared and the site must be registered on AHIMS.

10.4. Discovery of human remains

If suspected human remains are discovered and/or harmed in, on or under the land within the Project Area, the following actions must be undertaken:

- The remains must not be harmed/further harmed
- Immediately cease all works at that particular location
- Secure the area so as to avoid further harm to the remains
- Notify the NSW Police and the Environment Line (EPA) on 131 555 as soon as practicable and provide any details of the remains and their location
- Do not recommence any work at that particular location unless authorised in writing by Heritage NSW.

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Appendix A – Consultation log

Date	Contact (from)	Organisation (from)	Contact (to)	Organisation (to)	Discussion
Stage 4.1.2 Agency Letters, OUT					
28/07/2025	Gareth Holes	Everick Heritage		Heritage NSW	Agency letter
28/07/2025	Gareth Holes	Everick Heritage		Deerubbin LALC	Agency letter
28/07/2025	Gareth Holes	Everick Heritage		Registrar ALR 1983	Agency letter
28/07/2025	Gareth Holes	Everick Heritage		NNTT	Agency letter
28/07/2025	Gareth Holes	Everick Heritage		NTSCORP	Agency letter
28/07/2025	Gareth Holes	Everick Heritage		Hills Shire Council	Agency letter
28/07/2025	Gareth Holes	Everick Heritage		Greater Sydney Local Land Services	Agency letter
Stage 4.1.2 Agency Letters, Responses					
28/07/2025		Heritage NSW	Gareth Holes	Everick Heritage	auto response
28/07/2025		Hills Shire Council	Gareth Holes	Everick Heritage	auto response
28/07/2025		Heritage NSW	Gareth Holes	Everick Heritage	your response has been passed to the appropriate person
28/07/2025		NNTT	Gareth Holes	Everick Heritage	if you require a spatial search please refer to our website
29/07/2025	Redacted	Registrar ALR 1983	Gareth Holes	Everick Heritage	no registered parties within the Project Area.
30/07/2025		Deerubbin LALC	Gareth Holes	Everick Heritage	provided names of potential parties
30/07/2025		Heritage NSW	Gareth Holes	Everick Heritage	provided names of potential parties
30/07/2025		Greater Sydney Local Land Services	Gareth Holes	Everick Heritage	Greater Sydney LLS feels that it is not a primary source of contact for First Nations (Aboriginal) communities or persons that may inform or provide comment on development or planning issues.
31/07/2025		Hills Shire Council	Gareth Holes	Everick Heritage	council recommends contacting LALC
Stage 4.1.3 Invite to Apply, Letters					
30/07/2025	Gareth Holes	Everick Heritage	Redacted	Deerubbin LALC	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Wurrumay PTY LTD	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage			ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage			ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		A1 Indigenous Services	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Amanda Hickey Cultural Services	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage			
30/07/2025	Gareth Holes	Everick Heritage		Aragung Aboriginal Cultural Heritage Site Assessments	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage			ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		B.H. Heritage Consultants	ACHAR Invite Out

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Date	Contact (from)	Organisation (from)	Contact (to)	Organisation (to)	Discussion
30/07/2025	Gareth Holes	Everick Heritage	Redacted	Barking Owl Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Barraby Cultural Services	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Bidjawong Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Butucarbin Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Corroboree Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Cullendulla (Murrin Clan/Peoples)	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Darug Aboriginal Land Care	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Darug Boorooberongal Elders Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Dharug Custodian Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Darug Land Observations	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Deerubbin Local Aboriginal Land Council	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Dharug (Murrin Clan/Peoples)	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Dhinawan Culture & Heritage Pty Ltd	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Didge Ngunawal Clan	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		DJMD Consultancy	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Gilay Consultants	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Ginninderra Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Goodradigbee Cultural & Heritage Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Gulaga	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Gunjeewong Cultural Heritage Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Guntawang Aboriginal Resources Incorporated	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Redacted	ACHAR Invite Out

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Date	Contact (from)	Organisation (from)	Contact (to)	Organisation (to)	Discussion
30/07/2025	Gareth Holes	Everick Heritage	Redacted	Kamilaroi Yankuntjatjara Working Group	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Metropolitan Local Aboriginal Land Council	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Mura Indigenous Corporation (icn:8991)	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Murra Bidgee Mullangari Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Murramarang (Murrin Clan/Peoples)	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Ngambaa Cultural Connections	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Pemulwuy (Murrin Clan/Peoples)	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Thauaira	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Redacted	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Thoorga Nura	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Redacted on the behalf od the Wonnarua PBC	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Yarrowalk Pty Ltd	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Waawaar Awaa Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Wailwan Aboriginal Group	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Walgalu (Murrin Clan/Peoples)	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Woka Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Wori Woilywa	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Wurrumay Pty Ltd	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Yulay Cultural Services	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Yurrandaali	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Yurwang Gundana Consultancy Cultural Heritage Services.	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Bariyan Cultural Connections	ACHAR Invite Out

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Date	Contact (from)	Organisation (from)	Contact (to)	Organisation (to)	Discussion
30/07/2025	Gareth Holes	Everick Heritage	Redacted	RAW Cultural Healing	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Long Gully Cultural Services	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Guthers Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Gadu chts	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Redacted	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Darug Aboriginal Resource Centre	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Wallangang Aboriginal Corporation	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Gadhungal Marring	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Turtle Dreaming	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Guugaburra Yiramiilan	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Marri Culture & Heritage	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Darug Aboriginal Cultural Heritage Assessments	ACHAR Invite Out
30/07/2025	Gareth Holes	Everick Heritage		Darug Aboriginal Resource Centre	Left message on answerphone
30/07/2025	Gareth Holes	Everick Heritage			phone number disconnected
Stage 4.1.3 Invite to Apply, Responses					
30/07/2025	Redacted	Wailwan Aboriginal Group	Gareth Holes	Everick Heritage	Would like to register
30/07/2025		Darug Aboriginal Resource Centre			undeliverable
30/07/2025					undeliverable
30/07/2025		GARI	Gareth Holes	Everick Heritage	Would like to register
30/07/2025		Didge Ngunawal Clan	Gareth Holes	Everick Heritage	Would like to register
30/07/2025		Dharug Custodian Aboriginal Corporation	Gareth Holes	Everick Heritage	Would like to register
30/07/2025		Long Gully Cultural Services	Gareth Holes	Everick Heritage	Would like to register
30/07/2025		Guugaburra Yiramiilan	Gareth Holes	Everick Heritage	Would like to register
30/07/2025		Marri Culture & Heritage	Gareth Holes	Everick Heritage	Would like to register
30/07/2025					
31/07/2025		Deerubbin LALC	Gareth Holes	Everick Heritage	Would like to register

Date	Contact (from)	Organisation (from)	Contact (to)	Organisation (to)	Discussion
31/07/2025	Redacted	Corroboree Aboriginal Corporation	Gareth Holes	Everick Heritage	Would like to register
31/07/2025		Kamilaroi Yankuntjatjara Working Group	Gareth Holes	Everick Heritage	Would like to register
1/08/2025		A1 Indigenous Services	Gareth Holes	Everick Heritage	Would like to register
6/08/2025		Turtle Dreaming	Gareth Holes	Everick Heritage	Would like to register
13/08/2025		Gulaga	Gareth Holes	Everick Heritage	Would like to register
Stage 4.1.5 Notification Letters					
14/08/2025	Gareth Holes	Everick Heritage		Heritage NSW	notification
14/08/2025	Gareth Holes	Everick Heritage		Deerubbin LALC	notification
Stage 4.2 and 4.3 ACHAR Methodology					
14/08/2025	Gareth Holes	Everick Heritage	Redacted	Wailwan Aboriginal Group	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		GARI	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Didge Ngunawal Clan	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Dharug Custodian Aboriginal Corporation	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Long Gully Cultural Services	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Guugaburra Yiramiilan	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Marri Culture & Heritage	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Deerubbin LALC	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Corroboree Aboriginal Corporation	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Kamilaroi Yankuntjatjara Working Group	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		A1 Indigenous Services	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Turtle Dreaming	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Gulaga	ACHAR methodology out
14/08/2025	Gareth Holes	Everick Heritage		Wailwan Aboriginal Group	resend file as corrupted
14/08/2025	Gareth Holes	Everick Heritage		GARI	resend file as corrupted
14/08/2025	Gareth Holes	Everick Heritage		Didge Ngunawal Clan	resend file as corrupted
14/08/2025	Gareth Holes	Everick Heritage		Dharug Custodian Aboriginal Corporation	resend file as corrupted
14/08/2025	Gareth Holes	Everick Heritage		Long Gully Cultural Services	resend file as corrupted
14/08/2025	Gareth Holes	Everick Heritage		Guugaburra Yiramiilan	resend file as corrupted

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Date	Contact (from)	Organisation (from)	Contact (to)	Organisation (to)	Discussion	
14/08/2025	Gareth Holes	Everick Heritage	Redacted	Marri Culture & Heritage	resend file as corrupted	
14/08/2025	Gareth Holes	Everick Heritage		Deerubbin LALC	resend file as corrupted	
14/08/2025	Gareth Holes	Everick Heritage		Corroboree Aboriginal Corporation	resend file as corrupted	
14/08/2025	Gareth Holes	Everick Heritage		Kamilaroi Yankuntjatjara Working Group	resend file as corrupted	
14/08/2025	Gareth Holes	Everick Heritage		A1 Indigenous Services	resend file as corrupted	
14/08/2025	Gareth Holes	Everick Heritage		Turtle Dreaming	resend file as corrupted	
14/08/2025	Gareth Holes	Everick Heritage		Gulaga	resend file as corrupted	
14/08/2025	Gareth Holes	Everick Heritage		Dharug Custodian Aboriginal Corporation	called to notify of bounceback, no answer	
14/08/2025	Gareth Holes	Everick Heritage			we are not anticipating test excavation but will bear cleanup in mind for other projects.	
14/08/2025	Gareth Holes	Everick Heritage			Deerubbin LALC	
Stage 4.2 and 4.3 ACHAR Methodology, Responses						
14/08/2025	Redacted	Deerubbin LALC	Gareth Holes	Everick Heritage	file is corrupted	
14/08/2025		Didge Ngunawal Clan	Gareth Holes	Everick Heritage	Fine by us	
14/08/2025		Deerubbin LALC	Gareth Holes	Everick Heritage	please make recommendation that all groups have to share the load in digging and cleaning the sieves up at the end of the day and pack up as well.	
14/08/2025		Dharug Custodian Aboriginal Corporation	Gareth Holes	Everick Heritage	undeliverable mailbox full	
14/08/2025		Deerubbin LALC	Gareth Holes	Everick Heritage	no worries	
18/08/2025		Long Gully Cultural Services	Gareth Holes	Everick Heritage	Happy with methodology	
21/08/2025		Corroboree Aboriginal Corporation	Gareth Holes	Everick Heritage	Please ensure fieldwork is shared amongst all stakeholders.	
22/08/2025		Dharug Custodian Aboriginal Corporation	Gareth Holes	Everick Heritage	I surveyed this area in 2017, it is disturbed. Should be recognised as Darug Country	
27/08/2025		GARI	Gareth Holes	Everick Heritage	supports the methodology	
9/09/2025		Kamilaroi Yankuntjatjara Working Group	Gareth Holes	Everick Heritage	supports the methodology	
Stage 4.4 Draft ACHAR						
15/09/2025		Gareth Holes	Everick Heritage	Redacted	Wailwan Aboriginal Group	ACHAR Out
15/09/2025		Gareth Holes	Everick Heritage		GARI	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage	Didge Ngunawal Clan		ACHAR Out	

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Date	Contact (from)	Organisation (from)	Contact (to)	Organisation (to)	Discussion
15/09/2025	Gareth Holes	Everick Heritage	Redacted	Dharug Custodian Aboriginal Corporation	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage		Long Gully Cultural Services	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage		Guugaburra Yiramiilan	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage		Marri Culture & Heritage	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage		Deerubbin LALC	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage		Corroboree Aboriginal Corporation	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage		Kamilaroi Yankuntjatjara Working Group	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage		A1 Indigenous Services	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage		Turtle Dreaming	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage		Gulaga	ACHAR Out
15/09/2025	Gareth Holes	Everick Heritage		Wailwan Aboriginal Group	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		GARI	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Didge Ngunawal Clan	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Dharug Custodian Aboriginal Corporation	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Long Gully Cultural Services	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Guugaburra Yiramiilan	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Marri Culture & Heritage	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Deerubbin LALC	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Corroboree Aboriginal Corporation	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Kamilaroi Yankuntjatjara Working Group	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		A1 Indigenous Services	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Turtle Dreaming	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Gulaga	Updating timeframe
15/09/2025	Gareth Holes	Everick Heritage		Turtle Dreaming	left answerphone re. email bounce back
9/10/2025	Gareth Holes	Everick Heritage		Kamilaroi Yankuntjatjara Working Group	Resent files.
Stage 4.4 Draft ACHAR Responses					
15/09/2025	Redacted	Turtle Dreaming	Gareth Holes	Everick Heritage	email could not be delivered
15/09/2025	Redacted	Turtle Dreaming	Gareth Holes	Everick Heritage	email could not be delivered

Date	Contact (from)	Organisation (from)	Contact (to)	Organisation (to)	Discussion
19/09/2025	Redacted	GARI	Gareth Holes	Everick Heritage	recommend gardens with native Australian plants in recognition of first peoples of the land.
22/09/2025		Dharug Custodian Aboriginal Corporation	Gareth Holes	Everick Heritage	support the recommendations
9/10/2025		Kamilaroi Yankuntjatjara Working Group	Gareth Holes	Everick Heritage	Cannot open files
13/10/2025		Kamilaroi Yankuntjatjara Working Group	Gareth Holes	Everick Heritage	have reviewed and support recommendations

Appendix B – Newspaper notice

30/07/2025, 14:47

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Everick Heritage Pty Ltd (Everick Heritage) wishes to advise that we have been engaged to undertake an Aboriginal Cultural Heritage Assessment (ACHA) located at lots: Lot 2021 DP831173 at 3 Brookhollow Avenue, Norwest, New South Wales (NSW) 2153 (Project Area) by Patch Planning on behalf of Greensquare Data Centres (GSDC). GSDC are proposing construction of an 80 Megawatt (MW) data centre.

The Project is considered as a Major Project and the approval pathway for the development will be through Part 4, Division 4.7 of the Environmental Planning & Assessment Act 1979 (NSW). Planning Secretary's Environmental Assessment Requirements (SEARs) were issued on 8 April 2025 (SSD- 8192...). Requirement 19 of the SEARs (SSD- 8192...) states:

19. Aboriginal Cultural Heritage
Provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts to any Aboriginal cultural heritage sites or values associated with the site.

Everick Heritage is seeking the assistance of the Aboriginal community in assessing potential impacts this Project may have on Aboriginal cultural values in the area. The consultation will be undertaken to inform the ACHA, which is required by Deerubbin Local Aboriginal Land Council (LALC) and Heritage NSW. The proponent details are as follows:

Ashleigh Smith, Associate Director
GreenSquare DC c/- Patch Planning
Postal Address 70 George Street, Sydney 2000

In consideration of the Heritage NSW, Department of Environment Climate Change and Water (DECCW) Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW 2011, and in order to ensure that they fulfil their legal and ethical obligations to identify and protect Aboriginal cultural heritage, our client has instructed us to undertake the full community consultation process recommended by DPE in their Aboriginal Cultural Heritage Consultation Requirements for Proponents (2010).

Please note that details of the Aboriginal people or organisations who register an interest in consultation will be forwarded to Heritage NSW and Deerubbin LALC. Please advise at the time of registration if you do not wish for your details to be

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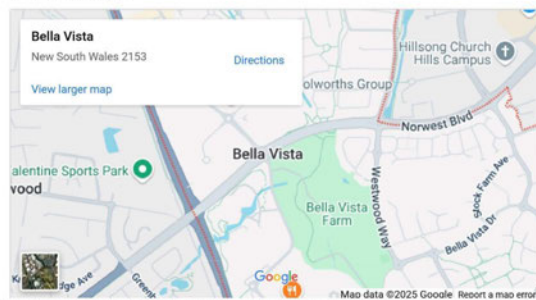
released to the relevant organisations. If you are interested, or know of persons who may be interested, we request that you contact us by Thursday, 28 August 2025 to register your interest. Please write to:

Gareth Holes
Senior Archaeologist
Everick Heritage Pty Ltd
Level 2/61 Renwick Street
Redfern NSW 2016
E: sydney@everick.net.au

If you have any questions about the Project, please contact Gareth Holes on 1300 124... . If you wish to find out more about our qualifications and experience in this field, please visit our website <https://www.everick.com.au>. We look forward to hearing from you.

GARETH HOLES
SENIOR ARCHAEOLOGIST
MAACAI, MA NEOLITHIC EUROPE, BA ARCHAEOLOGICAL PRACTICE
EVERICK HERITAGE PTY LTD

📍 Bella Vista 2153



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Appendix C – Consultation documentation

Redacted

Appendix D – Archaeological Technical Report

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Greensquare Datacentre

Archaeological Technical Report

Written for GreenSquare DC

May 2026

The Hills Local Government Area



EVERICK HERITAGE

Report Reference:

Everick Heritage 2026. Greensquare Datacentre: *Archaeological Technical Report*. Everick Heritage Pty Ltd unpublished report prepared for GreenSquare DC.



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Ver.	Date	Author	Technical Review	Authorised
1	15/09/2025	A. Hewson, G. Holes	J. Giang	K. Christian
2	14/10/2025	G.Holes	J. Giang	K. Christian
3	8/12/2025	G.Holes	J. Giang	K. Christian
4	28/05/2026	G.Holes	J. Giang	K. Christian

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Executive summary

This report has been prepared on behalf of Project Garden 1 Pty Ltd as trustee for the Norwest Property Trust (the applicant) in support of a State Significant Development Application (SSDA) submitted to the Department of Planning, Housing and Infrastructure (DPHI) under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The SSDA seeks development consent for the construction and operation of a data centre, with a total power consumption of approximately 96MW. The proposal will form part of a state-of-the-art data centre campus operated by Green Square Data Centres (Green Square DC), equipped to cater for growing data storage needs within Australia and the emergence of artificial intelligence (AI).

The site is known as 3 Brookhollow Avenue, Norwest (Lot 2021 DP 831173) and is in the Norwest locality, which forms part of the Hills Local Government Area (LGA). Development surrounding the site comprises of a mix of commercial, retail and residential land uses.

This SSDA seeks development consent for the construction and operation of a data centre, with a total power consumption of approximately 96MW. The proposal will form part of a broader state-of-the-art data centre campus, equipped to cater for growing data storage needs within Australia and the emergence of artificial intelligence (AI).

This ACHAR has been prepared as a response to this requirement. It has also been prepared according to the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010b) and aims to assess and document Aboriginal cultural values and outline the consultation process with Aboriginal stakeholders.

This ATR has been prepared according to the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010a) and presents the results of the archaeological survey.

Results and conclusions

The Project Area is assessed to be of low to moderate archaeological sensitivity due to its proximity to Strangers Creek and location on slightly elevated flats in the Cumberland Plain; however, due to the extensive prior disturbance, including earthworks, infrastructure development, and landscape modification, it is assessed as having low archaeological potential.

An archaeological survey was undertaken on 1 August 2025. The result of the archaeological survey did not identify any Aboriginal sites or areas of PAD. The Project Area was found to be highly disturbed resulting in the removal and or modification of upper soil profiles. Therefore, the Project Area has very low potential to contain any sub-surface archaeological materials. The proposed works are considered highly unlikely to result in impact to Aboriginal cultural heritage, therefore no further archaeological investigations are recommended.

The following recommendations are provided as a precaution and to harmonise the Project with surrounding cultural values:

Recommendations

Recommendation 1 - Aboriginal community consultation

In accordance with the Consultation Requirements (DECCW 2010a), up-to-date consultation must be maintained by the Client or representing Archaeologist with the RAPs during the approvals process. Should six months lapse without contact with the RAPs, the consultation process will no longer be considered current by Heritage NSW and they may request that the Consultation Requirements (DECCW 2010a) process be restarted.

Recommendation 2 - Heritage Induction

A Heritage Induction should be provided to all staff working in the Project Area, to appraise them of the Aboriginal heritage values of the Project Area and Unexpected Finds Procedure.

The Heritage Induction should also include a summary of obligations and liabilities for impacting Aboriginal sites without appropriate authorisation.

Recommendation 3 - Designing with connecting with country framework

In accordance with the ESD intergenerational principle, it is recommended that GSDC incorporate Aboriginal cultural heritage values that acknowledges the Darug people and the land on which the Project Area stands. For NSW built environment projects, this can be achieved through the use of the Connecting with Country framework (Government Architect New South Wales 2023) to help guide design principles. It is understood that the design has yet to be finalised for this Project, thereby offering ample opportunity for Aboriginal community consultation. Further engagement should be undertaken to adhere to the Connecting with country framework. The results of community engagement may be in the form of:

- Heritage interpretation boards – temporary or permanent, within or outside the Project Area.

- Cultural heritage awareness talks by Darug people.

It is acknowledged that GSDC may already implement the ESD intergenerational principle in some form or through the above strategies.

Recommendation 4: Unexpected finds

Unexpected Aboriginal objects remain protected by the *NPW Act*. If any such objects, or potential objects, are uncovered in the course of the activity, work in the vicinity must cease, the project archaeologist Heritage NSW, and Deerubbin LALC be contacted for advice.

Recommendation 5: Discovery of human remains

If suspected human remains are discovered and/or harmed in, on or under the land within the Project Area, the following actions must be undertaken:

- The remains must not be harmed/further harmed
- Immediately cease all works at that particular location
- Secure the area to avoid further harm to the remains
- Notify the NSW Police and the Environment Line (Heritage NSW) on 131 555 as soon as practicable and provide any details of the remains and their location
- Do not recommence any work at that particular location unless authorised in writing by Heritage NSW.

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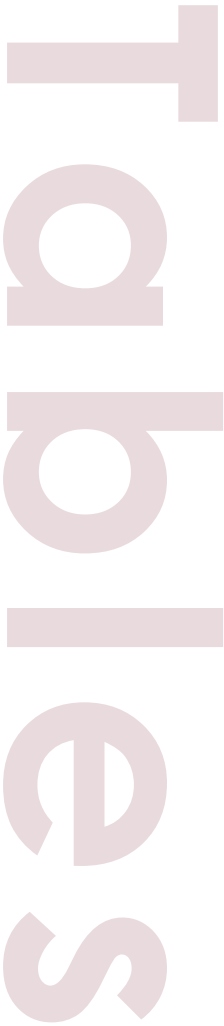
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Glossary

Term	Definition
ACHAR	Aboriginal Cultural Heritage Assessment Report
The consultation requirements	Aboriginal cultural heritage consultation requirements for proponents 2010
AHC	Australian Heritage Council
Australian Heritage Council Act	<i>Australian Heritage Council Act 2003 (Cth)</i>
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
ALR Act	<i>Aboriginal Land Rights Act 1983 (NSW)</i>
ATR	Aboriginal Archaeological Technical Report
ASRF	Aboriginal Site Recording Form
ATSIHP Act	<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)</i>
BP	Before Present (the year 1950)
CHL	Commonwealth Heritage List
Code of Practice	Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales
DCP	Development Control Plan
DECCW	Department of Environment, Climate Change and Water (now Heritage NSW)
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
EPBC Act	<i>Environment Protection and Diversity Conservation Act 1999 (Cth)</i>
Everick Heritage	Everick Heritage Pty Ltd
the Guide	Guide to Investigating, Assessing and Reporting on Aboriginal cultural heritage in NSW
GPS	Global Positioning System
GSDC	GreenSquare Data Centres

Term	Definition
GSV	Ground Surface Visibility
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
LGA	Local Government Area
NHL	National Heritage List
NPW Act	<i>National Parks and Wildlife Act 1974 (NSW)</i>
OEH	(former) New South Wales Office of Environment and Heritage
PAD	Potential Archaeological Deposit
Project Area	3 Brookhollow Avenue, Norwest, NSW 2153 (Lot 2021 DP8.1173)
RAP	Registered Aboriginal Party
RNE	Register of the National Estate
s	section
sqm	square metres
SEPP	State Environmental Planning Policy
TISEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021 (NSW)</i>

1. Introduction

1.1. Purpose of this report

GreenSquare Data Centres (GSDC) are preparing construction of a data centre at 3 Brookhollow Avenue. The Project is considered as a Major Project and the approval pathway for the development will be through Part 4, Division 4.7 of the Environmental Planning & Assessment Act 1979 (NSW). The Planning Secretary's Environmental Assessment Requirements (SEARs) were issued on 8 April 2025 (SSD-81928961) and required preparation of an Environmental Impact Statement (EIS). Everick Heritage was engaged to undertake an Aboriginal Heritage Cultural Assessment (ACHA) to assess any potential impacts to any Aboriginal cultural heritage sites or values to support the EIS. This Aboriginal Technical Report (ATR) has been prepared to support the ACHAR.

1.2. Project area

The site is known as 3 Brookhollow Avenue, Norwest (Lot 2021 DP 831173) and is in the Norwest locality, which forms part of the Hills Local Government Area (LGA). Development surrounding the site comprises of a mix of commercial, retail and residential land uses as described below:

- To the north of the site is Norwest Boulevard, commercial office buildings, an early learning centre, 'Castle Pines' retirement community and Castle Hill Country Club Golf Course;
- To the east of the site is Windsor Road, commercial office buildings, small pockets of residential development and industrial development;
- To the south of the site is Brookhollow Avenue, commercial developments, a hotel and medium density residential development; and
- To the west of the site is commercial development, including a shopping centre (Norwest Marketown), various retail offerings and the Norwest Metro Station.

The site is well serviced by public transport including bus and Metro. Norwest Metro Station provides connections to Tallawong in the northwest and Sydney CBD to the southeast. Bus stops along Norwest Boulevard provide connections through to Parramatta, Seven Hills and Rouse Hill.

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As shown (Figure 1-1: The Project Area, the site is in proximity to Strangers Creek and Brookhollow Reserve, located at the site's southwestern border. Norwest Lake is located approximately 90m northwest of the site.

1.3. Project description

The subject site is legally described as Lot 2021 of Deposited Plan (DP) 831173. The site can be described as irregularly shaped and has a total land area of approximately 51,867 sqm. A portion of the site currently comprises an existing 4MW data centre that was approved under D93/318, dated 21 June 1993.

The site is bound by Brookhollow Avenue to the south and east, Brookhollow Reserve and the Hills Corporate Centre to the west and Norwest Boulevard to the North. The primary frontage of the site is to Brookhollow Avenue, where vehicular access is provided.

Based on a review of topographical mapping, the site appears to fall from east to west from a maximum height of RL104 in the northeastern corner of the site to RL82m along the western portion of the site.

The site is located approximately 500m to the east of the Norwest Metro station, with the metro line running under the north / northwest boundary of the site.

The site is heavily vegetated, however, none of the vegetation is mapped on the biodiversity values mapping prepared under the *Biodiversity Conservation Act 2016* (BC Act).

1.4. Overview of development

This SSDA seeks development consent for the construction and operation of a data centre, with a total power consumption of approximately 96MW. The proposal will form part of a broader state-of-the-art data centre campus, equipped to cater for growing data storage needs within Australia and the emergence of artificial intelligence (AI).

Specifically, the proposal includes:

- Minor site preparation works including tree clearing and bulk earthworks;
- Civil earthworks and the installation of relevant servicing infrastructure and utilities;

- Construction of a four (4) storey data centre with roof top plant, equating to an RL 130 and Gross Floor Area (GFA) of 16,191m²;
- Installation of 77 x diesel fuel generators and associated diesel storage
- Provision of on-site car parking for approximately 25 spaces; and
- Landscaping and offset tree planting.

The proposed development is depicted in Figure 1-2. with full architectural details provided within the EIS, of which this report forms an Appendix.

1.5. Report objectives

This ATR has been undertaken in accordance with the *Code of Practice for the Protection of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change & Water [DECCW] 2010a, known as the Code of Practice).

In accordance with the Code of Practice includes the following objectives have been identified for this ATR:

- Review previous archaeological work;
- Document a search of the Aboriginal Heritage Information Management System (AHIMS) database;
- Review the landscape context;
- Summarise and discuss the local and regional character;
- Synthesise the above information into a predictive model for the distribution of Aboriginal sites in the local area;
- Document the findings of an Aboriginal archaeological survey of the Project Area;
- Identify any previously unknown Aboriginal sites, within the Project Area;
- Inspect and assess registered Aboriginal sites located within or in close proximity to the Project Area;
- Provide recommendations and management strategies for any Aboriginal sites or objects potentially impacted by the proposed Project.

1.6. Authors and contributors

Section 1.6 of the Code of Practice (DECCW 2010a) includes minimum requirements for individuals undertaking Aboriginal investigation in NSW. Table 1-1 provides a list of authors and contributors and outlines their qualifications.

Aboriginal consultation in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* (Consultation Requirements) (DECCW 2010b), commenced on 28 July 2025, a total of thirteen Aboriginal parties registered an interest in the project, two Registered Aboriginal Parties (RAPs), took part in the archaeological survey. Full details of the consultation are included in the ACHAR.

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Table 1-1: Authors and contributors

Contributor	Affiliation	Role	Qualification
Jason Giang	Everick Heritage	Specialist Archaeologist, site survey	Ba – Archaeology (Hons) 6+ years
Gareth Holes	Everick Heritage	Senior Archaeologist, report writing and project management	BA (Hons) 6 years Test excavation supervisor and report author on ACHA xx location
Amber Hewson	Everick Heritage	Archaeologist, report writing,	BA. Arch. Dip. Cultural Heritage Materials Conservation 3 years Contributing author
Matthew Hedges	Everick Heritage	Graduate Archaeologist, assistance with report writing	Master of Arts (Research) - Archaeology Bachelor of Archaeological Practice Bachelor of Classical Studies 1 year Contributing author

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Figure 1-1: The Project Area

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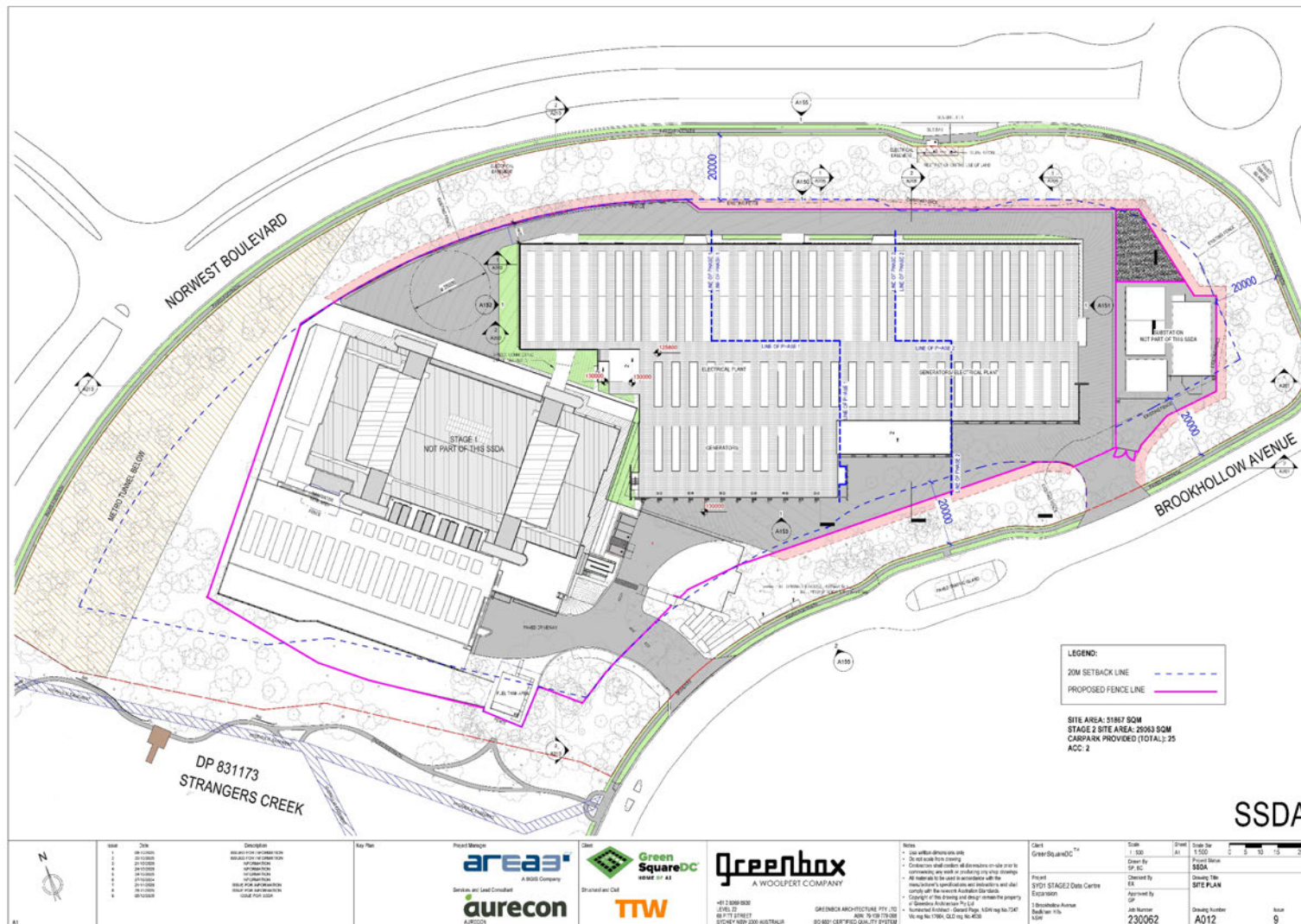


Figure 1-2: Project design (provided by GSDC, December 2025)

2. Legislative Context

2.1. Commonwealth legislation

2.1.1. Environment Protection and Biodiversity Conservation Act 1999 (Cth)

The *Environment and Heritage Legislation Amendment Act (No.1) 2003* (Cth) amends the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act) to include 'national heritage' as a matter of National Environmental Significance and protects listed places to the fullest extent under the Constitution. It also establishes the National Heritage List (NHL) and the Commonwealth Heritage List (CHL).

The *Australian Heritage Council Act 2003* (Cth) (AHC Act) establishes the Australian Heritage Council (AHC), an advisory body to the Minister for the Environment and Heritage and retains the Register of the National Estate (RNE).

The *Australian Heritage Council (Consequential and Transitional Provisions) Act 2003* (Cth) (Australian Heritage Council Act) repeals the *Australian Heritage Commission Act 1975* (Cth), amends various Acts as a consequence of this repeal and allows the transition to the current heritage system.

Together the above three Acts provide protection for Australia's natural, Indigenous and non- Indigenous heritage. Features include:

- The NHL of places of national heritage significance.
- The CHL of heritage places owned or managed by the Commonwealth.
- The creation of the AHC, an independent expert body to advise the Minister on the listing and protection of heritage places.
- Continued management of the Register of the National Estate (RNE).

Most State Aboriginal heritage databases provide protection for those sites with physical evidence. The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* (Cth) (ATSHP Act) deals with Aboriginal cultural property in a wider sense. Such cultural property includes any places, objects and folklore that 'are of particular significance to Aboriginals in accordance with Aboriginal tradition'. In most cases,

archaeological sites and objects registered under the State Act will also be Aboriginal places subject to the provisions of the ATSIHP Act.

There is no cut-off date and the ATSIHP Act may apply to contemporary Aboriginal cultural property as well as ancient sites. The ATSIHP Act takes precedence over State cultural heritage legislation where there is conflict. The responsible Minister may make a declaration under Section 10 of the ATSIHP Act in situations where state or territory laws do not provide adequate protection of heritage places.

2.1.1.1. National Heritage List

The NHL is a list of places with outstanding heritage value to our nation, including places overseas. So important are the heritage values of these places that they are protected under the EPBC Act. This means that a person cannot take an action that has, will have, or is likely to have, a significant impact on the national heritage values of a national heritage place without the approval of the Australian Government Minister for the Environment and Heritage. It is a criminal offence not to comply with this law and there are significant penalties.

2.1.1.2. Commonwealth Heritage List

The CHL is a list of places managed or owned by the Australian Government and not of relevance to this project. Places registered on the CHL are protected under the EPBC Act.

2.1.1.3. Register of the National Estate

The RNE is an evolving record of Australia's natural, cultural and Aboriginal heritage places that are worth keeping for the future. The AHC compiles and maintains the RNE under the Australian Heritage Council Act. Places on the RNE that are in Commonwealth areas, or subject to actions by the Australian Government, are protected under the EPBC Act by the same provisions that protect Commonwealth heritage places (see above).

Following amendments to the Australian Heritage Council Act, the RNE was frozen on 19 February 2007, meaning no new places can be added, or removed. From 2012, all references to the RNE were removed from the EPBC Act and the AHC Act. The RNE is now maintained on a non- statutory basis as a publicly available archive.

2.1.2. Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)

Most State Aboriginal heritage databases provide protection for those sites with physical evidence. The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Cth)* (ATSIHP Act) deals with Aboriginal

cultural property in a wider sense. Such cultural property includes any places, objects and folklore that are of particular significance to Aboriginals in accordance with Aboriginal tradition'. In most cases, archaeological sites and objects registered under the State Act will also be Aboriginal places subject to the provisions of the ATSIHP Act.

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The Australian Government Gazette hold a record of all applications for the protection of specific areas under the ATSIHP Act. A search of the Government Gazette has confirmed that there is not a specific area protected by the provisions of the ATSIHP Act.

2.2. State legislation

The *National Parks and Wildlife Act 1974* (NSW) (NPW Act) provides statutory protection to all Aboriginal places and objects. An Aboriginal object is defined as:

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

Part 6 of the NPW Act provides specific protection for Aboriginal objects and declared Aboriginal places by establishing offences of harm. Harm is defined to mean:

destroying, defacing, damaging or moving an object from the land.

The protection provided to Aboriginal objects applies regardless of the level of their significance or issues of land tenure. Aboriginal objects and places are afforded statutory protection in that it is an offence to knowingly or unknowingly desecrate an Aboriginal object or place under section (s) 86 of the NPW Act.

In accordance with s 89A any person who is aware of the location of an Aboriginal object must notify the Chief executive in the prescribed manner within a reasonable time of becoming aware of that object. The prescribed manner is through preparation and submission of an Aboriginal Site Recording Form (ASRF) to the Aboriginal Heritage Information Management System (AHIMS) (DECCW 2010b: 14).

In order to undertake a proposed activity which is likely to involve harm to an Aboriginal object or Aboriginal Place it is necessary to apply to Heritage NSW (Department of Climate Change, Energy, the Environment and Water [DCCEEW]) for an Aboriginal Heritage Impact Permit (AHIP). AHIPs are issued by the Aboriginal Heritage Regulation Team (Heritage NSW) under section 90 of the NPW Act and permit harm to certain Aboriginal objects and Aboriginal Places.

2.2.1. Heritage Act 1977 (NSW)

The Heritage Act 1977 (NSW), (The Heritage Act) is administered by the DCCEEW, protects the natural and cultural heritage of New South Wales. Although Aboriginal cultural heritage is primarily protected by the NPW Act, provisions relating to the Heritage Act may apply if the item is listed on the State Heritage Register (SHR) or is subject to an interim heritage order. An item or places' Aboriginal heritage values may contribute to the overall heritage significance of the place.

The Heritage Act is established by the NSW Heritage Council which provides the Minister for Heritage with recommendations for the listing of items on the SHR. The Minister approved the listing of items and places on the SHR and can prevent the destruction or alteration of items or places with potential State heritage values with the implementation of an interim heritage order until the significance of the item has been assessed.

2.2.2. Environmental Planning and Assessment Act 1979

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is administered by the Department of Planning, Housing and Infrastructure which provides planning controls and requirements for environmental assessments in the development approval process. The main parts of the EP&A Act which relate to the development assessment and approval are Part 4 (Development assessment) and Part 5 (Environmental assessment) which both require Aboriginal cultural heritage values be assessed prior to approval.

Division 4.7 of the EP&A Act allows for the Minister with portfolio responsibility for planning to declare a specified development SSD, declaration of SSD turns off the AHIP provision under Section 90 of the NPW Act. Aboriginal objects and sites remain protected under the NPW Act and all works must be authorised under SEARs or Ministers Conditions of Consent as appropriate. SEARs were issued on 8 April 2025 (SSD-88215996). In accordance with the SEARs an EIS, must be prepared in accordance with Part 8 of the *Environmental Planning and Assessment Regulation 2021* (EP&A Regulation) and *State Significant*

Development Guidelines (Department of Planning, Housing and Infrastructure [DPHI] 2024). Requirement 19 of the SEARs is provided in Table 2-1.

Table 2-1: Relevant SEARs Requirements (SSD-88215996)

Requirement	Assessment Requirements	Documentation
19. Aboriginal Cultural Heritage	Provide an ACHAR prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts to any Aboriginal cultural heritage sites or values associated with the site.	ACHAR

2.2.3. Aboriginal Lands Right Act 1983 (NSW)

Aboriginal Land Councils (at the State and local level were established by the *Aboriginal Land Rights Act 1983* (NSW) (ALR Act). Aboriginal Land Councils have a statutory obligation under the ALR Act to:

- a) take action to protect the culture and heritage of Aboriginal persons in the council’s area, subject to any other law, and*
- b) promote awareness in the community of the culture and heritage of Aboriginal persons in the council’s area.*

The Project Area is within the boundary of the Deerubbin LALC. In accordance with the requirements of the ALR Act, Deerubbin LALC was consulted for all stages of this ACHA.

2.2.4. Native Title Act 1994 (NSW)

The Native Title Act 1994 (NSW) was introduced to work in conjunction with the Native Title Act 1993 (Cth). Native Title claims, registers and Indigenous Land Use Agreements (ILUA) are administered under the Act. A search of National Native Title Tribunal was undertaken on 22 July 2025. No Native Title claims or determinations were identified, within, or in the vicinity of, the Project Area.

3. Environmental Context

3.1. Geomorphology and soils

The Project Area is situated on the Cumberland Plains and is located on the boundary between the Blacktown and Luddenham soil landscapes (Figure 3-3), as mapped in the Soil Landscapes of the Sydney 1:100,000 Sheet (Chapman et al., 2009). These soil landscape maps provide an inventory and detailed description of landscape properties of the Project Area and identify major soil and landscape qualities and constraints. These descriptions can assist the archaeological assessment of an area by identifying the presence of archaeologically sensitive landscape features.

3.1.1. Blacktown Soil Landscape

The Blacktown soil landscape is characterised by undulating low hills on Wianamatta Group Shales which include Ashfield Shale, Bringelly Shale and Minchinbury Sandstone. Surface outcrops of shale do not occur naturally but may occur where soils have been removed. Soils that are shallow to moderately deep and composed of various horizons, including loams and clays with shale fragments throughout. A small, likely modern, ridge extends across the area, potentially composed of fill material. The soil profile within the Blacktown soil landscape consists of a brownish black loam topsoil (A Horizon) up to 300 millimetres (mm) in depth, followed by a hard-setting clay loam (A2 Horizon), which is typically 100 – 300 mm thick (Figure 3-1). The subsoil is a light brown clay which typically occurs at depths of 500 mm. The dominant soil horizons (bt1, bt2, bt3) exhibit moderate erodibility, with the upper layers helping to preserve the lower, more erodible layers, thereby supporting a stable soil profile. This stability suggests that Aboriginal objects may exist at moderate depths and could have survived past surface disturbances, as a result the Blacktown soil landscape is known for deeper A horizon soils which hold potential for Aboriginal objects.

3.1.2. Luddenham Soil Landscape

The Luddenham soil landscape is surrounded by the Blacktown soil landscape and comprises low rolling to steep low hills, with convex narrow ridges and hillcrests grading into moderately inclined side slopes that have narrow concave drainage lines as well. Its soil consists of shallow to deep layered sediments with an A horizon topsoil of dark brown loam or brown clay loam over a B horizon of coloured to brown and grey clay (Figure 3-2). The erosion hazard at the Luddenham soil landscape ranges from moderate

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to very high for non-concentrated flows but increases to high or very high during periods of concentrated flows. As the Luddenham soils are typically deeper than those of the Blacktown soil landscape, Aboriginal objects may be present at a greater depth within those soils, if present.

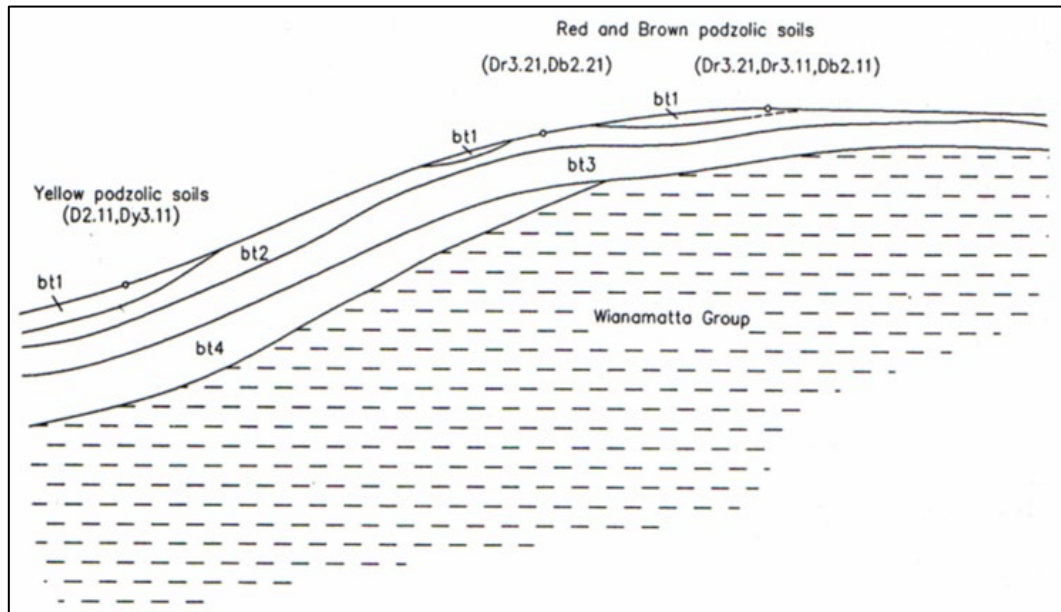


Figure 3-1: Distribution diagram of the Blacktown soil landscape showing the occurrence and relationship of dominant soil materials Source: (Bannerman and Hazelton 2011: 101)

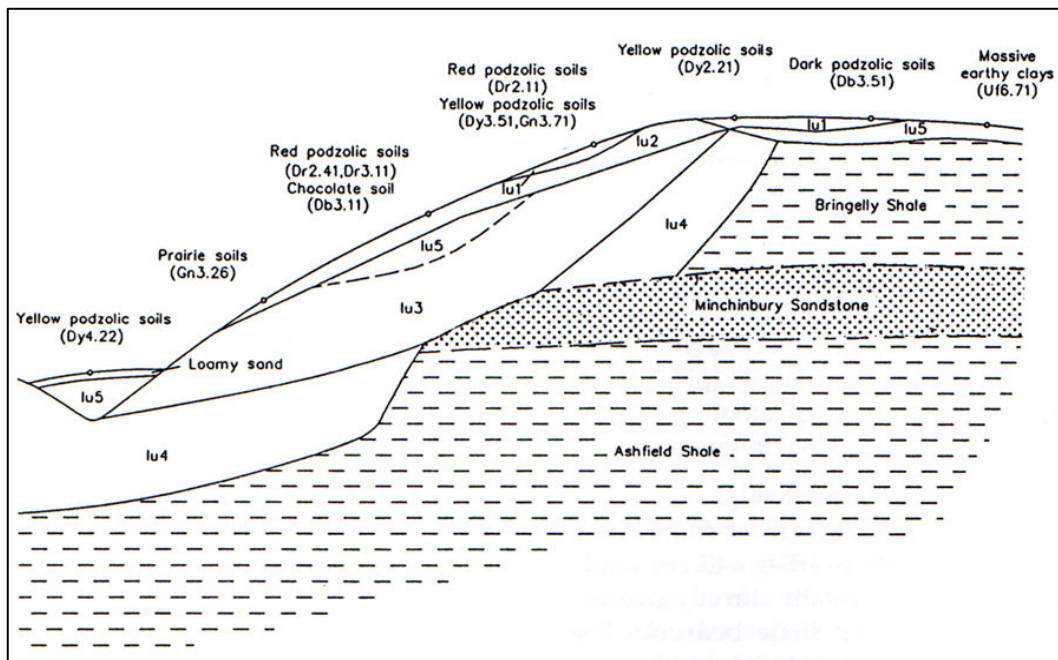


Figure 3-2: Distribution diagram of the Luddenham soil landscape showing the occurrence and relationship of dominant soil materials. (Source: Bannerman and Hazelton 2011: 101)

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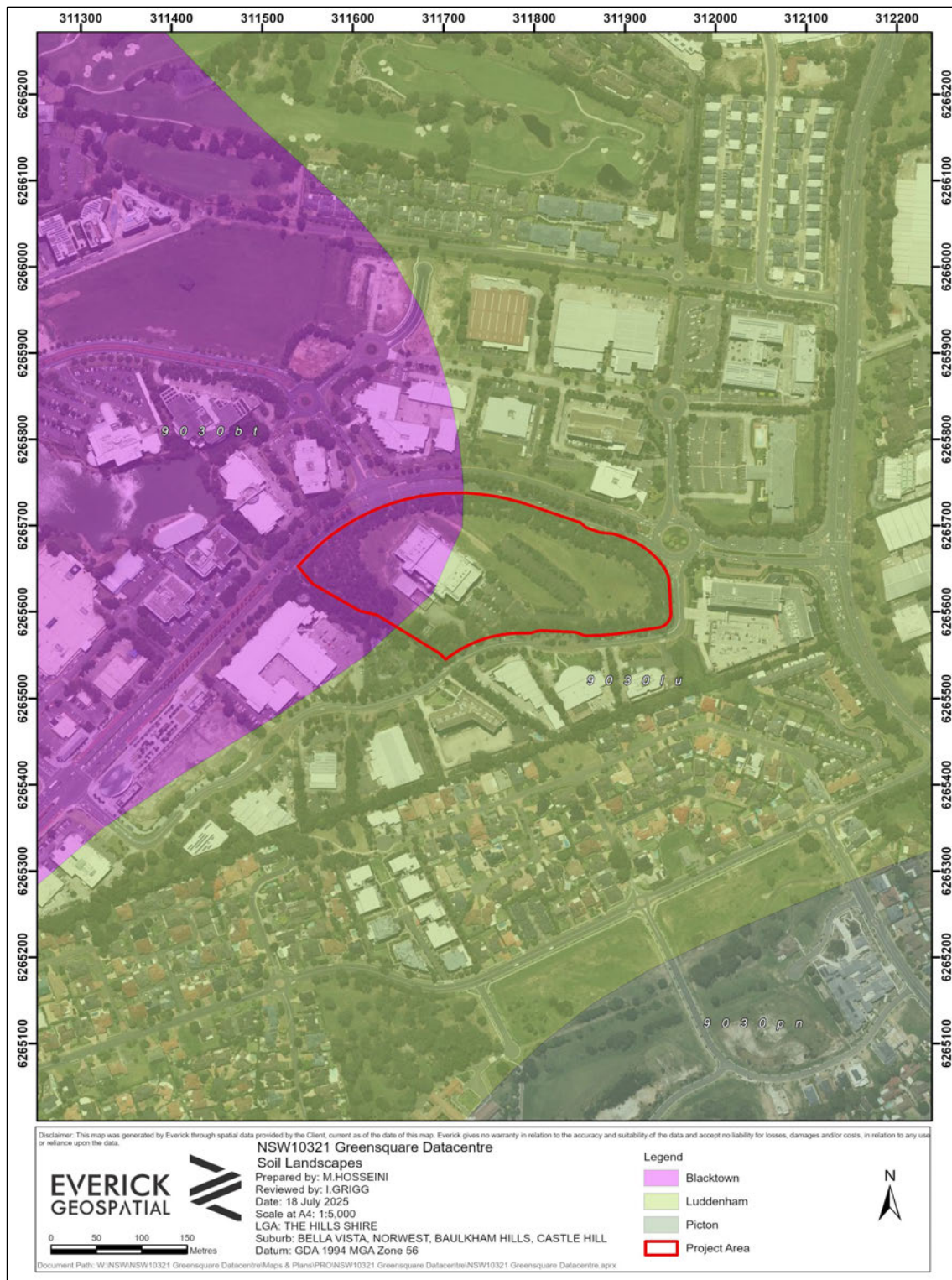


Figure 3-3: Soil landscapes of the Project Area

3.2. Topography and hydrology

The Project Area is situated on the lower slopes of a gently undulating hill with a westward gradient towards Strangers Creek. The landform consists of a low gradient slope transitioning into alluvial floodplain and a drainage depression along the Riparian creek corridor.

The Project Area borders Strangers Creek to the west, a second order stream with two unnamed first orders streams to the southwest feeding into it (Figure 3-4). Strangers Creek is a tributary of Cattai Creek, located 1.3 km to the northeast. In the area near Norwest boulevard directly north of the Project Area, Strangers Creek has seen heavy modification with a network of ponds and culverts.

These watercourses would have provided year-round access to fresh water. Riparian environments typically supported higher diversity of flora and fauna. The well drained elevated land would have been ideal for camping and repeated occupation.

3.3. Flora and fauna

The Blacktown soil landscape supports open dry sclerophyll forest, which has been extensively cleared for agriculture and residential development. Dominant tree species include Forest Red Gum, Narrow-Leaved Ironbark, Grey Box, and Spotted Gum, with occasional stands of Grey Gum near Penrith and Mugga Ironbark on the crests (Bannerman & Hazelton 2011). The broader Hawkesbury-Nepean region, which includes the Project Area, is highly biodiverse, with 606 terrestrial vertebrate species recorded since European settlement, comprising 51 amphibian species, 382 bird species, 80 mammalian species, and 93 reptile species (NPWS 2002).

The floral and faunal diversity of the local area would have provided a range of resources to Aboriginal people. Aboriginal people would have travelled throughout the landscape to access the resources provided by this diversity.

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Figure 3-4: Topography/ Geology and hydrology of the Project Area

3.4. Historical context

In 1799, the first formalised settlement of the Seven Hills region began following the issuing of a joint 980-acre (396.5 ha) land grant to Joseph Foveaux and Charles Grimes. In 1801, the land was sold to John Macarthur, who incorporated it into his 'Seven Hills Farm' estate. By May 1821, the 'Seven Hills Farm' estate was resumed by the Crown in exchange for Macarthur receiving another land grant in Camden. Following this, the Seven Hills region was subdivided and sold. Of this land, James Robertson was granted a 500-acre (202.3 ha) property, on which the heritage-listed 'Bella Vista Farm' was later constructed. During its first decades, the region was primarily under cereal agriculture, with wheat farms created to sustain the growing colony. However, the poor soils were quickly exhausted, with cereal cultivation being replaced by orcharding as it was recognised that the latter was the more viable practice (Brooks 2008).

On 19 October 1831, a 500-acre (202.3 ha) land grant that included the Project Area was subdivided from the former 'Seven Hills Farm' estate and sold to Susanna Matilda Ward, widow of Lieutenant William Gordon Ward of the 1st Regiment of Foot Guards. Before acquiring the land, Susanna Matilda Ward had served as the Matron of the Female Orphanage Institution, Parramatta, from 1821 to 1824. On 12 March 1835, Ward sold a 200-acre (80.9 ha) portion of her grant, including the Project Area, to George Banks Suttor, owner of the adjacent estate to the east of Windsor Road (Tanner & Associates Pty Ltd 2000:21). On 3 September 1875, the property was sold to Edward Hart Acres, landowner of the 'Heywood' estate, located to the north (Brook 2008). The land was then sold to John Booth Jones, Charles Smith Jones and Rowland Hassall on 11 November 1886 and passed to Rowland George Hassall on 12 August 1904.

The Norwest Business Park was conceived during the 1980s, with Baulkham Hills Shire Council and the New South Wales State government rezoning the land in 1987. During this time, the land on which the Project Area is located was subdivided and road construction began on Norwest Boulevard and Brookhollow Avenue. By 1989, groundworks for the road construction had been initiated to the north and south of the 3 Brookhollow Avenue site, with extensive levelling and other earthmoving activities conducted. Subdivision and sale of the business park was initiated in 1992. By 1993, Cathay Pacific Airways purchased the 3 Brookhollow Avenue site for \$5.2 million, with the intention of building a \$260 million data centre to replace their Hong Kong facility (Corrigan 1993). Construction began in 1994 and was completed in 1995, constituting the first phase of development within the Norwest Business Park. In 1997, Cathay Pacific commenced negotiations for the transfer of the data centre to IBM Global Services (Connors 1997). A larger carpark area was constructed on the eastern side of the data centre building

in 1998, with this being the most recent, observable major alteration to the fabric and spatial arrangements of the site.

3.4.1. Previous land use

Historic Aerial photographs are available for the site back to the 1950s, these allow us to understand the more recent development of the Project Area and indicate the level of ground disturbance that has occurred since that time. The 1955 aerial shows the Project Area was mainly agricultural with orchards to the south and some residential construction in the southwest (Figure 3-5). This is consistent with the land use history discussed above which indicated impacts up to this time were limited to stock movement and clearance of the native vegetation.

Limited development is evident in the broader area in 1965 (Figure 3-6), including the appearance of several larger buildings to the south of the Project Area, indicating the early stages of suburban expansion. While the local area was becoming more developed, the Project Area remained undisturbed, and no additional impacts can be seen.

In the 1991 groundworks for the road construction had been initiated to the north and south of the 3 Brookhollow Avenue site, with extensive levelling and other earthmoving activities conducted. Subdivision and sale of the business park was initiated in 1992 (Figure 3-7). This phase of activity would have had a significant impact on the potential for Aboriginal objects across much of the site. However, the full extent of these impacts is not clear from the aerials.

By 2002 (Figure 3-8) imagery reveals significant landscape modification, including the diversion of Strangers Creek into a series of artificial ponds and culverts, forming part of a planned drainage and water management network associated with urban development. A large carpark area was constructed on the eastern side of the data centre building. This would have continued to exacerbate the impacts resulting from the previous phase.

3.5. Summary

The documented land use history of the Seven Hills region demonstrates that the Project Area has been subject to extensive and repeated modification since the early 19th century. Initial land grants, subdivision, orcharding and cattle grazing would have resulted in significant ground disturbance through ploughing, planting, and associated infrastructure. Subsequent property transfers and changes in land management, followed by 20th-century commercial redevelopment, further altered the natural

landscape. This long history of intensive use and modification has likely removed or displaced intact archaeological deposits, contributing to the Project Area's current highly disturbed condition.

Based on evidence from historical aerial imagery, the Project Area has undergone significant disturbance over time including road construction, earthworks, subdivision, the diversion of Strangers Creek for a planned urban drainage system and the construction of the data centre and associated infrastructure. These activities have extensively reduced the Project Areas archaeological potential. While some pockets of intact deposit may be present the majority of the site is unlikely to contain Aboriginal objects.

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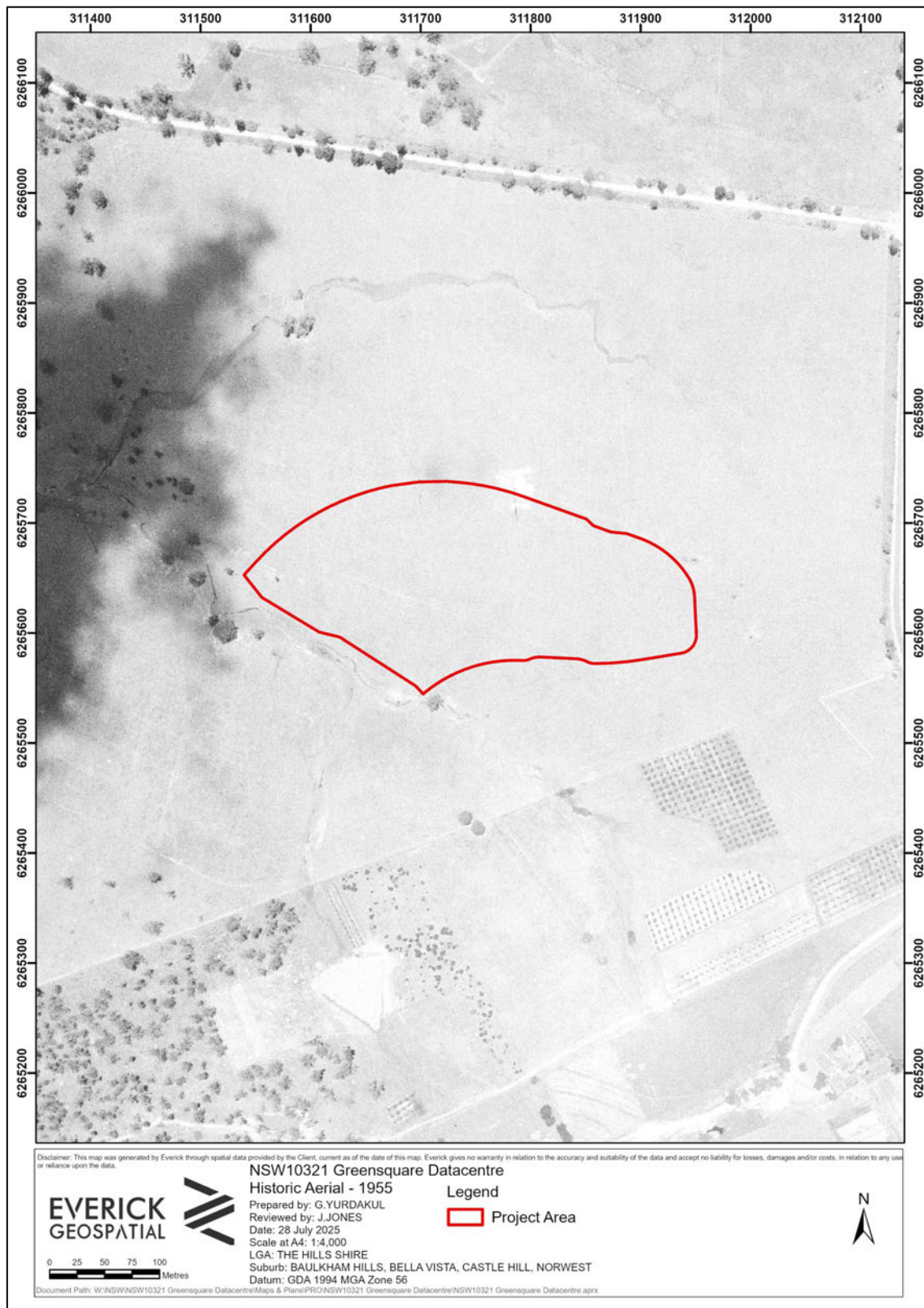


Figure 3-5: 1955 historical aerial imagery of the approximate location of the Project Area denoted in red (Source: NSW Spatial Services)

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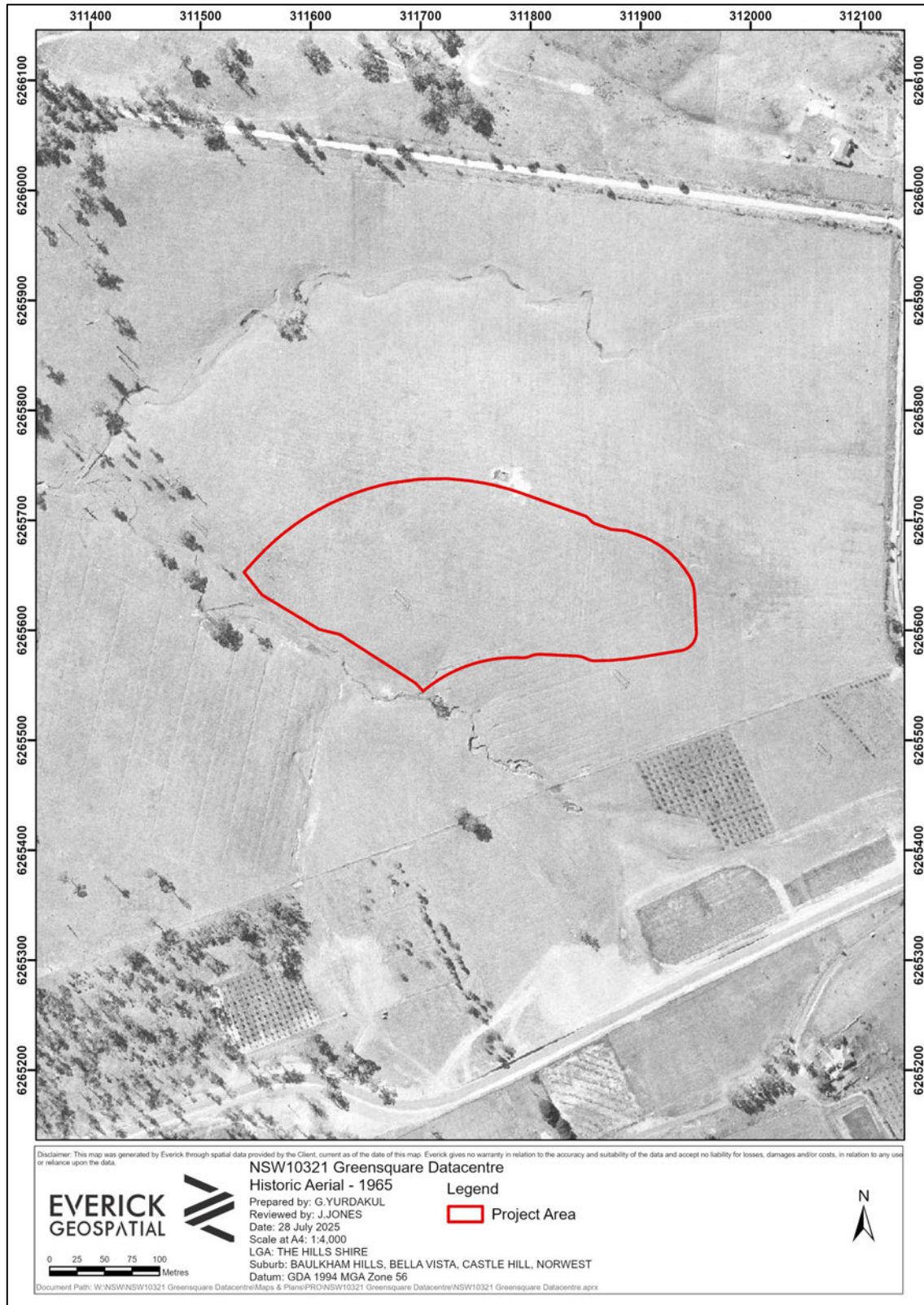


Figure 3-6: 1965 historical aerial imagery of the approximate location of the Project Area denoted in red (Source: NSW Spatial Services)

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Figure 3-7: 1991 historical aerial imagery of the approximate location of the Project Area denoted in red (Source: NSW Spatial Services)

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Figure 3-8: 2002 historical aerial imagery of the approximate location of the Project Area denoted in red (Source: NSW Spatial Services)

4. Ethnohistorical and archaeological context

4.1. Ethnohistorical context

This ethnohistoric context provided here is, largely, limited to a literature review. Where comments have been received from RAPs as part of the consultation they have been integrated into this ethnohistory.

Terminology used regarding Aboriginal people and culture has varied both over time and geographically and terminology used in quotes provided here may not be considered appropriate in the modern context. In addition, different Aboriginal individuals and groups may prefer different terminology (e.g. clan, tribe etc.). Efforts have been made to ensure that the terminology used in this ethno-history is the preferred terminology of the Aboriginal groups being described.

Most information about the socio-cultural structure of Aboriginal societies comes after European contact and largely from ethnohistorical accounts. These accounts are inherently colonial in nature and suffer from the prejudices and biases of their time. Further these accounts are often intertwined with observations made after significant social disruption had already occurred following the arrival of colonial settlers. As a result, information surrounding traditional occupational boundaries and social structure are often contentious and restricted by limitations of both a physical and intentional manner. Boundaries between groups were likely far more diffuse than the arbitrary definitions applied by colonial observers and this must be taken into consideration when identifying and consulting traditional owners and/or custodians. Language groups are widely used to define the boundaries of Aboriginal groups, however as mentioned above this information is derived from post-contact colonial accounts and members of the Aboriginal community may have a divergent understanding of the boundaries of Country.

Clans based on patrilineal or matrilineal descent were the basic unit of pre-colonial Aboriginal society. These clans had defined territories and ritual and economic responsibilities to one another and within their respective systems. Clusters of neighbouring clans, which shared a standard dialect and family interests, distinguished themselves from other clusters using a language name (Tindale 1974).

The Dharug people lived in smaller groups, known as "clans," and in social or ritual groups referred to as "bands" (Attenbrow, 2010). The distinction between the two is that clans are typically smaller family groups. In contrast, bands are often not from the same clan but come together for ritual purposes or combined hunting and gathering activities (Attenbrow, 2010). Aboriginal people's boundaries were

permeable, as fixed boundaries, such as rivers, were not evident in the landscape, and kinship ties extended across nations (Tench 1793).

Early European settlers identified the Aboriginal people of the local area as part of the Dharug (also known as Darug or Dharruk) language group. The Dharug people inhabited the area bounded by Port Jackson and Botany Bay to the east, the Georges River to the south and southwest, the Hawkesbury River to the northwest, and as far west as the Blue Mountains. Three distinct dialects were noted, including the coastal (sometimes referred to as Eora), the hinterland (plains), and the mountains (Collins 1798; Tench 1793; Dawes 1790).

The location of the clan Country determined the resources available for exploitation. The Hawkesbury and Nepean Rivers were a significant resource and a focus of occupation for Aboriginal people. Yams were grown along the rich alluvial floodplain and formed an essential staple for the Dharug and Darkinjung people. The men hunted and fished while the women gathered fruits and dug up yams and fern roots. When women gathered yams, they often broke off the top part and reburied it to ensure it would be available again the following year (Attenbrow, 2010).

Various tools and weapons were used for hunting, gathering, preparing food resources, transporting materials, creating other helpful equipment, and for decorative purposes. Most objects were highly portable and very versatile, able to be used for various activities. Recorded items of material culture include hunting and fishing spears, spear-throwers (at least two types), fishing lines and hooks, stone axes and hatchets, digging sticks, clubs, shields, string and net bags, baskets, bark containers and canoes, scrapers, adzes and awls, animal skin cloaks and a variety of stone tools (Attenbrow A. 2010, Kohen 1986). Spears were commonly crafted from grass tree (*Xanthorrhoea*) stalks, tipped and barbed with worked stone flakes or bone (although shell was standard in coastal areas). Grass tree resin and gum from eucalypts were used to bind and fix these in place (Kass, Liston, & McClymont, 1996, p. 6). Spears, spear throwers, boomerangs, and shields were made from bark, timber, gums, and resins. Bird feathers, animal teeth, nuts, ochre, animal skins and plant fibres were used to create tools and decorative items, including clothing, cloaks and personal ornamentation. Leaves, bark and fibrous stems were used to make nets, bags, traps, baskets, string and rope.

Many of these objects were made from organic materials and as a result are unlikely to survive in the archaeological record. While organic material may be preserved when rapidly buried following burning or within waterlogged deposits, the majority of sites are unlikely to preserve organic material. The archaeological record, therefore, is dominated by stone artefacts which are far more likely to be preserved. Culturally modified trees were present throughout the landscape and served a wide range of purposes. European settlement has resulted in the clearance of many of the mature native trees however

Aboriginal people lived and moved throughout the landscape, traveling widely to access a range of resources. Therefore, Aboriginal sites and objects may be present on all landforms as objects were lost or discarded while travelling. Larger and denser sites may be present where longer term occupation took place, such as campsites, typically located where good access to water was available. Longer term activity would also take focus on places where other resources were available, such as stone quarries.

The arrival of Europeans had a major impact on aboriginal people, causing significant social and economic upheaval. Contact with Europeans introduced diseases, such as smallpox, that drastically altered the size and structure of the Aboriginal population. The expansion of settlements and establishment of farmland subsumed the traditional areas used for subsistence, leading to significant violence against Aboriginal communities (Attenbrow, 2010).

4.2. Archaeological context

4.2.1. Database Searches

4.2.1.1. Aboriginal Heritage Information Management System (AHIMS)

The nature and location of Aboriginal sites can be culturally sensitive information and should only be made publicly available with the consent of the Aboriginal community, all AHIMS information must be redacted prior to release of this report to the public.

Caution should be taken when using the AHIMS database to reach conclusions about site prevalence or distribution. For example, a lack of sites in a given area should not be seen as evidence that the area was not occupied by Aboriginal people. It may simply be an indication that it has not been surveyed for cultural heritage, or that the surveys were undertaken in areas of poor surface visibility. Further to this, care needs to be taken when looking at the classification of sites. For example, the decision to classify a site an artefact scatter containing shell, rather than a midden can be a highly subjective exercise, the threshold for which may vary between archaeologists.

An extensive search (Client ID: 1024836) of the Heritage NSW AHIMS database was conducted on 17 July 2025 for the project area and its surrounds with the following coordinates:

GDA, Zone: 56,

Easting: 308693.0 - 314693.0,

Northing: 6262647.0 - 6268647.0

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As a result of the AHIMS search, 109 Aboriginal site listings were identified ([Appendix 1](#), Figure 4-1). 20 of these sites are listed as partially or completely destroyed, where subsequently activity has impacted the sites. With a further three (3) listed as Not a Site or deleted, where further investigation determined there was no potential. There are seven sites located within 1 km of the Project Area (Figure 4-2).

Aboriginal sites on the AHIMS database are defined using a combination of, one or more, 'site features' taken from a list of 20 standard features (OEH 2012). Within the search area, six of these site types were found (Table 4-1), artefact is the most common site feature followed by Potential Aboriginal Deposits (PAD). A summary of the search results can be found in Table 4-2.

Artefacts appear in 92 of the 109 (84.4 per cent) of recorded sites in the search area, both on their own and alongside other site types such as art or grinding grooves. Stone tools made up an important part of the Aboriginal toolset and were used widely for a range of purposes. In addition, stone tools are both resilient, they survive where organic objects do not, and are widely recognisable by Aboriginal people and archaeologists. PADs are the second most common site type within the search area, appearing at 19 (17.4%) of sites. PADs are locations where potential for subsurface Aboriginal objects has been identified, however further investigation is required to determine if Aboriginal objects are present.

A single Aboriginal burial is known 2.4km to the southwest of the Project Area, in addition three Aboriginal resource gathering sites are known in the search area.

The distribution of Aboriginal sites within the search area indicates a strong association with watercourses and intact landforms. Artefact scatters and PAD, which makes up the majority of recorded sites are typically found near creeks and drainage lines. Grinding grooves are recorded on sandstone exposures within creek corridors, further reinforcing the link between site presence and access to water. This suggests that proximity to water and less disturbed landforms are key factors in influencing site distribution.

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Table 4-1: AHIMS Site Features, from OEH 2012

Site features	Description
Aboriginal resource and gathering	Related to everyday activities such as food gathering, hunting, or collection and manufacture of materials and goods for use or trade.
Notes: 1. This is not Aboriginal object and therefore not included in the legislative process. 2. Not to be used for fish trap, shell or stone quarry	
Art	Art is found in shelters, overhangs and across rock formations. Techniques include painting, drawing, scratching, carving engraving, pitting, conjoining, abrading and the use of a range of binding agents and the use of natural pigments obtained from clays, charcoal and plants.
Artefacts	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people.
Burials	A traditional or contemporary (post-contact) burial of an Aboriginal person, which may occur outside designated cemeteries and may not be marked, e.g. in caves, marked by stone cairns, in sand areas, along creek banks etc.
Grinding grooves	A groove in a rock surface resulting from manufacture of stone tools such as ground edge hatchets and spears, may also include rounded depressions resulting from grinding of seeds and grains.
Potential archaeological deposit (PAD)	An area where Aboriginal objects may occur below the ground surface.

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Site features	Description
	Note: This is not Aboriginal object and therefore not included in the legislative process unless accompanied by an object.

Table 4-2: Frequency of site features within the search area.

Site feature	Number	Percentage
Aboriginal Resource and Gathering	3	2.75%
Artefact	78	71.56%
Artefact, Art (Pigment or Engraved)	1	0.92%
Artefact, Grinding Groove	3	2.75%
Artefact, Potential Archaeological Deposit (PAD)	10	9.17%
Burial	1	0.92%
Grinding Groove	5	4.59%
Potential Archaeological Deposit (PAD)	9	8.26%
Total	109	100

4.2.2. AHIMS Sites within 1 km

4.2.2.1. Belvis 5 (AHIMS ID 45-5-1104)

Belvis 5 (AHIMS ID 45-5-1104) is located 750 m south west of the Project Area at the intersection of Whiteman Avenue and Lombard Place. AHIMS ID 45-5-1104 comprises a small campsite beside a tributary of Toongabbie Creek, with red silcrete and indurated mudstone artefacts. Following initial identification, the site was impacted by road construction and now lays underneath the intersection.

4.2.2.2. Delaney Drive (AHIMS ID 45-5-1109)

Delaney Drive (AHIMS ID 45-5-1109) is located 945 m south east of the Project Area on a public reserve on the corner of Delaney Drive and Coolock Crescent. A survey identified an open campsite on high ground 30 m from Toongabbie creek. Multiple stone artefacts were observed eroding from the ground, predominantly red silcrete.

4.2.2.3. Solent Circuit (AHIMS ID 45-5-2972)

Solant Circuit (AHIMS ID 45-5-2972) is located approximately 400m north west of the Project Area, on the western slope of a creek overlooking a small creek. A total of eight artefacts were identified at four locations scattered around the hillslope. The artefacts comprised a variety of silicified tuff, silcrete and

quartz. The site was subsequently subject to surface collection under an s 90 permit (AHIP 3349) and was destroyed.

4.2.2.4. Spurway Drive PAD (AHIMS ID 45-5-3391)/ SD PAD (AHIMS ID 45-5-3427)

Spurway Drive PAD (AHIMS ID 45-5-3391)/ SD PAD (AHIMS ID 45-5-3427) is located 450 m to the north west of the Project Area, initially identified as an area with potential for Aboriginal objects at the end of Spurway Drive, the site is located within 100 m of Strangers Creek. In 2010 it was identified that Spurway Drive PAD (AHIMS ID 45-5-3391) was a duplicate of SD PAD (AHIMS ID 45-5-3427) and recommended it be updated to not a site, however both sites remained registered as valid and all further work has been undertaken under Spurway Drive PAD (AHIMS ID 45-5-3391). In 2017 test excavation of the site was undertaken, a total of 46 'test excavation units' excavated of which seven (7) produced a total of 12 Artefacts. The majority of the artefacts were silcrete with a combination of flakes, flake fragments and bondi points. A single core made from a dark green jasper was identified.

4.2.2.5. Fairway Drive IF1 (AHIMS ID 45-5-3954)

Fairway Drive IF1 (AHIMS ID 45-5-3954) is located 800 m north west of the Project Area and comprises a single isolated artefact within a disturbed context at the edge of a driveway, approximately 50 m from Strangers Creek. This demonstrates the potential for Aboriginal objects to be present in areas of disturbance.

4.2.2.6. 31-33 Fairway Drive Kellyville (AHIMS ID 45-5-4775)

31-33 Fairway Drive Kellyville AHIMS ID 45-5-4775 is located 920 m to the north west of the Project Area and comprises a small artefact scatter within a disturbed context 150 from Strangers Creek. Test excavation revealed that the site was disturbed, however 3 objects were identified. This demonstrates the potential for Aboriginal objects within in areas of disturbance.

4.2.2.7. Fairway Drive AFT 2 (AHIMS ID 45-5-4905)

Fairway Drive AFT 2 (AHIMS ID 45-5-4905) is located 960 m to the north west of the Project Area and comprises an artefact scatter, adjacent to a tributary for Strangers Creek. Test excavation revealed a relatively intact archaeological deposits with moderate significance, a total of 27 Aboriginal objects were recovered from four test pits.

4.2.2.8. Summary

Registered Aboriginal sites in the local area are typically located in close proximity of creek lines, in particular Strangers Creek. Strangers Creek runs adjacent to the western side of the Project Area, is associated with a numerous registered Aboriginal site.



Figure 4-1: Distribution of AHIMS sites within proximity to the Project Area

Redacted

4.3. Other database searches

Table 4-3 summarises searches of statutory listings and databases undertaken on 24 July 2025.

Table 4-3: Statutory listings and databases in or within vicinity of Project Area.

Statutory list or database	Listed (Y/N)	Item name	Listing number
Aboriginal Heritage Impact Permit (AHIP) Register	Y	47 Spurway Drive, Baulkham Hills	AHIP ID: C0003203
Native Title Register	N	No items identified	N/A
World Heritage List / buffer zone	N	No items identified	N/A
National Heritage List	N	No items identified	N/A
Commonwealth Heritage List	N	No items identified	N/A
State Heritage Register	N	No items identified	N/A
Hills Shire Local Environmental Plan 2019	Y	St Joseph's Novitate	17
	Y	Avenue of trees leading to Castle Hill Country	125
	Y	Windsor Road from Baulkham Hills to Box Hill	128

4.3.1. AHIP Register

One AHIP (AHIP ID: 0003203), has been identified within 500m of the Project Area,

4.3.1.1. AHIP ID: 0003203

AHIP ID: 0003203 was issued on 11 December 2017 and authorised harm to SD PAD (AHIMS ID 45-5-3427), no further information was provided and the AHIP elapsed on 11 December 2022.

4.3.2. Hills Shire LEP 2019

Three heritage items listed on the LEP are located within 500m of the Project Area. However, none are present within the Project Area, and the State Heritage Inventory does not include any statement of significance for these items.

4.4. Previous investigations

4.4.1. Regional Studies

The Cumberland Plain region of Western Sydney is one of the most studied regions in urban Australia, and there are in excess of seven thousand sites registered within the region. Over half of the sites are artefact sites (artefact scatters or isolated finds), with Potential Archaeological Deposits (PAD) the next most common feature, followed by axe grinding grooves and then other undefined site types including quarries, non-human bone and shell (AHIMS 2015: 27). This record matches the frequency of AHIMS sites discussed in Section 4.2.1.1.

A large scale regional archaeological study of the Cumberland Plain was undertaken in the mid-1980s by Kohen (1985), which found that proximity to water was one of the most defining factors in site location and density of surface artefact sites in the region. More than 65 per cent of surface artefact scatters were located within 100 m of a source of permanent fresh water and only eight per cent of sites were greater than 500 m from a source of water.

The Rouse Hill Development Area (RHDA) located 8 km northwest of the Project Area, consisted of systematic test excavations of the open landscape, as a result a comprehensive predictive model was developed which has subsequently been applied widely across the Cumberland Plain. The assessment concluded that the whole of the RHDA was a cultural landscape, however the distribution of Aboriginal objects was found to be impacted by a number of factors.

White and McDonald (2010) produced a predictive model and desktop assessment which has been the basis of much of the subsequent archaeological research in the Cumberland Plain. The model can broadly be summarised as follows:

4.4.1.1. Stream order and distance to water

Water supply is considered a significant factor in the distribution of Aboriginal sites, with higher stream orders associated with both higher numbers and densities of Aboriginal sites. Sites were most often found within 50-100m of 4th order creeks, and within 50m of lower stream orders.

4.4.1.2. Landform

Aboriginal objects were identified on all landforms. The lowest density was found on the upper slopes and ridgelines, with the highest density found on terraces. Mid slopes and creek flats featured a moderate density.

4.4.1.3. Aspect

Aspect was found to have an impact on the distribution of sites on lower slopes, with higher densities on north and northeast facing slopes. No impact was found on the distribution of sites on upper slopes.

4.4.1.4. Proximity to Silcrete Sources

Two major sources of silcrete were identified within the RHDA, at Plumpton Ridge and Crown Street, Riverstone. The assessment found that distance to known silcrete sources had little influence on the distribution of Aboriginal objects, however it was suggested that other silcrete sources may also be influencing distribution and obscuring the impact. Subsequent investigations identified low quality silcrete was present on ridgelines and paleochannels throughout the Cumberland Plain (Doelman et.al 2015).

4.4.2. Helen Brayshaw Heritage Consultants 2004, Town Centre Norwest Business Park Baulkham Hills LGA, Aboriginal Heritage Assessment

Helen Brayshaw Heritage Consultants (HBHC) undertook Archaeological investigation of a block of land in Baulkham Hills LGA (HBHC 2004), 150 m northwest of the Project Area. Small Creek crosses south to north in the centre of the study area. Based on previous assessments and preliminary research, Helen Brayshaw Heritage Consultants developed the following predictive statements:

- First order creeks (headwaters of upper tributaries): Archaeological evidence expected to be sparse. Likely to represent background scatter only.
- Second order creeks (middle reaches of minor tributaries): Archaeological evidence may occur as sparse but focused activity, examples include one-off camp sites or single-episode knapping floors.
- Third order creeks (lower reaches of tributary creeks): Greater potential for frequent occupation and evidence may include repeated use by small groups, likely to find reused knapping floors and more concentrated activity areas.

- Fourth order creeks (major creek lines, e.g. lower reaches of Caddies and Second Ponds Creeks): High potential for permanent or repeated occupation. Sites may be complex and possibly stratified.
- Creek junctions (confluences of watercourses): Likely foci for site activity. The size of the junction (stream ranking node) may influence the scale and nature of occupation.

The assessment found that the majority of the study area had been disturbed however eight (8) Aboriginal objects were identified at four locations within a highly disturbed context. This demonstrated the potential for Aboriginal objects to be present in close proximity to creek lines despite disturbance. This highlights potential within the Project Area due to the proximity of Strangers Creek.

4.4.3. Archaeological & Heritage Management Solutions Pty Ltd 2006, Spurway Drive Development, Baulkham Hills, NSW – Aboriginal Heritage Assessment

Archaeological & Heritage Management Solutions Pty Ltd (AHMS) undertook an archaeological assessment for a proposed residential development approximately 270 m north of the Project Area. The assessment resulted in a predictive model which identified that:

- Open artefact scatter sites across all landforms within the study area where original A-horizon topsoils and/ or alluvium is present. The integrity of stone artefact deposits will depend on the degree of disturbance of original topsoils caused by erosion and agricultural activities.
- Scarred or carved trees may be present.
- Isolated finds can occur anywhere in the landscape.

The study area is located on the Blacktown and Luddenham soil profiles bordering Strangers Creek in a highly disturbed context similar to the Project Area.

The survey results indicated that there was low ground surface visibility during the survey and more than 95% of the study area was covered in grass and suburban development. Therefore, it was not adequate to make meaningful conclusions about the presence or absence of surface artefacts and sites.

Although the survey was limited by low GSV, the findings still suggest a low likelihood of intact deposits, particularly given the high level of disturbance in the Project Area where surface visibility is similarly constrained.

Comparable conditions exist within the Project Area, with previous disturbance restricting surface visibility and reducing the potential for intact subsurface archaeological material.

No Aboriginal sites or objects were identified within the study area. No scars were observed on mature trees within the study area.

4.4.4. GML 2015, Showground Station Precinct, Castlehill. Aboriginal Cultural Heritage Assessment

SJB Planning engaged GML Heritage on behalf of the NSW Department of Planning and Environment to prepare an Aboriginal Heritage Assessment report for the proposed Showground Station Precinct. The study area is approximately 1.7 km northwest of the Project Area within the Blacktown soil profile. A desktop assessment was completed with the results presented below:

Based on previous assessments and preliminary research, the following predictive statements were developed:

- Average artefact densities are highest within 100 m of a creek. Between 100 m and 200 m from the creek, higher artefact densities are generally found in clusters associated with discreet knapping floors (stone tool manufacture sites) amidst much lower density background artefact scatter.
- Grinding grooves can be found on landforms associated with the creek.
- Based on the highest artefact and site densities, lower to mid-slope landforms approximately 200 m from the creek with a northerly and northeasterly aspect were preferred occupation locations for Aboriginal people.
- Artefact densities decline with distances over 200 m from the creek, and in all low-lying areas adjacent to the creek, there are generally only low average artefact densities.
- Most stone artefacts are made from silcrete.
- Some sites can show specialisation, and the variety of activities undertaken between adjacent sites is apparent.

The desktop report identified that the Precinct contains one known Aboriginal site and another on the Precinct boundary. Eighteen Aboriginal sites are registered within 1 km of the study area. Based on previous investigations, including a search of the NSW Aboriginal Heritage Information Management System (AHIMS) and an analysis of the local environment, it was determined that the Precinct could contain unrecorded Aboriginal heritage sites. It is most likely that such sites will be open campsites, artefact concentrations, and/or isolated finds. These may be found anywhere within the Precinct as part of the typical Aboriginal archaeological signature present on the Cumberland Plain, often concentrated on slightly sloping to level ground, usually within 100 to 200 m of a watercourse.

The results of field surveys and test excavations in these previous study areas show that the likelihood of previously unknown sites being disturbed by proposed works is extremely low. This is due to the nature and extent of these disturbances in the topsoil levels. Locations disturbed through ground excavation works are unlikely to have any intact Aboriginal archaeological deposits.

The Project Area has been subject to the same levels of disturbance, thereby reducing the likelihood of intact archaeological deposits being present.

4.4.5. Everick 2025, Mixed-Use Residential Flat Development, Castlehill, NSW – Aboriginal Cultural Heritage Assessment

Alton Property Group engaged Everick Heritage to prepare an Aboriginal Cultural Heritage Assessment report for the proposed Mixed-Use Residential Flat Development in Castlehill. The study area is approximately 3 km southeast of the Project Area.

Based on previous assessments and preliminary research, the following predictive statements were developed:

- Stream order and proximity to water sources are the primary determinants of the complexity of archaeological sites
- Artefact sites with high densities (>100 artefacts per site) are more likely to be associated with large permanent watercourses, such as the Nepean and Parramatta Rivers
- Lower-density scatters, or artefacts redeposited by erosion and water discharge, may be reburied in fluvial sediments.
- Artefact sites may predominantly comprise silcrete and chert, typically located in low-lying areas adjacent to the creeks.

The desktop assessment found that the Project Area had been heavily disturbed and that there were no sites within 1 km of the Project Area.

A survey of the Project Area confirmed the findings of the desktop assessment, which found that the majority of the area has been heavily impacted by prior residential development and subsequent demolition. No Aboriginal sites, potential archaeological deposits (PADs), or archaeologically sensitive landforms were identified during the survey.

Given the proximity and comparable soil landscape and a similar history of land disturbance, these findings reinforce that the Project area is unlikely to retain Aboriginal archaeological deposits.

5. Predictive model

The predictive model developed for this assessment relies on the known distribution of Aboriginal sites across the broader region, established archaeological research, and local environmental features within and surrounding the Project Area. Previous archaeological investigations in similar landscape settings have shown that proximity to watercourses is the most consistent factor influencing the density and distribution of Aboriginal sites. Other key factors affecting the location and preservation of cultural materials include post-depositional processes such as erosion, sediment scalding, and water movement.

The model for the Project Area is founded on the following lines of evidence:

- Known site distribution and their relationship to the landforms within the Project Area;
- Consideration of site types, raw material availability, and artefact densities likely to be encountered;
- Ethnohistorical accounts concerning Aboriginal use of the local landscape, which may correspond to material traces;
- The presence (or probable past presence) of natural resources that could have supported cultural activities;
- Spatial and temporal patterns observed in the broader archaeological record, relevant to the Project Area and surrounding region.

For the purposes of this assessment, the archaeological sensitivity and potential of the Project Area are considered related but separate concepts.

Archaeological sensitivity relates to landforms and environmental features linked with Aboriginal use and occupation, such as high ridgelines, nearby water sources, and ecological richness. Sensitivity is categorised on a scale from Low to High.

Archaeological potential indicates the likelihood of finding Aboriginal cultural material at a site, considering both landform sensitivity and any current or past disturbances to the ground surface and subsurface layers. It is assessed on a graded scale from Low to High, based on desktop research and visual inspection findings.

The Project Area is predicted to be of low to moderate sensitivity due to its proximity to Strangers Creek and location on slightly elevated flats in the Cumberland Plain; however, due to the extensive prior disturbance, including earthworks, infrastructure development and landscape modification for the construction of surrounding roads, it is assessed as having low archaeological potential, with no

likelihood of intact Aboriginal cultural heritage sites being present. A summary of the predicted site types and their expected occurrence within the Project Area is provided in Table 5-1.

Table 5-1: Predicted site types and their predicted presence

Site Type	Description & Predictive Statement	Predicted Presence
Artefact Scatters / Isolated Finds	The most likely site types to occur within the Project Area are artefact scatters. Silcrete and chert are the raw materials most likely to be encountered in association with higher order streams and elevated landforms Given the extent to which the Project Area had previously been disturbed, it was considered that there is low to moderate potential for artefact scatters to be present across the majority of the Project Area	Low to moderate
Potential Archaeological Deposits (PADs)	In areas where A horizon soils have been removed or substantially disturbed by erosion it is unlikely that sub-surface deposits remain	Low
Grinding Grooves	Unlikely to occur in the Project Area due to lack of suitable rock outcrops	Low
Shell Middens	Less likely due to the previous land disturbance	Low
Culturally Modified Trees (CMTs)	Scarred and carved trees would not be expected in areas where land clearance has resulted in the removal of old growth trees	Low

6. Archaeological survey

6.1. Aims

The primary aims of the survey were to:

- Examine all landscape features that will potentially be impacted by the proposed works, identifying areas of archaeological potential in accordance with the predictive model.
- Identify and record Aboriginal sites, objects and areas of potential archaeological deposit (PAD) within the Project Area.
- Verify if the Project Area contained areas of ground disturbance and map the extent and nature of that disturbance.
- Consult with the RAPs with regard to any management measures required for mitigation of impact to Aboriginal sites or objects.

6.2. Timing and personnel

The archaeological survey of the Project Area was conducted on foot over a single day on 01 August 2025. The following table provides details of the survey participants:

Table 5-2: Survey personnel

Name	Organisation	Role
Jason Giang	Everick Heritage	Senior Archaeologist, survey leader
Matthew Hedges	Everick Heritage	Graduate Archaeologist
Steven Knight	Deerubbin LALC	Aboriginal Cultural Representative
Nathan Donovan	Deerubbin LALC	Aboriginal Cultural Representative

6.3. Methodology

The strategy was to undertake a complete pedestrian survey of the Project Area, inspecting all mature native vegetation for cultural scarring and targeting ground surface exposures for evidence of Aboriginal

sites or objects. All accessible areas of the Project Area were surveyed in two survey units and systematically inspected for Aboriginal objects, areas of PAD and culturally modified trees.

If sites and/or objects were identified during field survey, their location was to be recorded with a GPS (using GDA 94 datum) using an iPad Mini with cellular GPS capability, in accordance with the Code of Practice. The Esri ArcGIS Online Web Map platform was used for data mapping, providing a geolocational recording of survey points, track logs, photographs and survey notes. A photographic record was kept of all survey units to record aspects such as surface exposures, vegetation, disturbance and areas of archaeological potential. Scales were used for photographs, where appropriate.

6.4. Survey units

The Project Area was divided into two survey units (SU) for the purpose of archaeological survey. The boundary of the two survey units was delineated at the base of an artificial slope that forms the terrace to the northeast of the extant datacentre structure, creating two areas of approximately equal area. The following table provides the details of the survey units utilised in the archaeological survey:

Table 5-3: Description of Survey Units

ID	Location	Notes
SU-01	External grassed area and boundary plantings to the south and west of the data centre building.	No access issues. Survey conducted external of all structures and areas of carpark and associated landscaping.
SU-02	External grassed area and boundary plantings to the north and east of the data centre building.	No access issues.



Figure 5-1: Survey map showing the survey tracks and the areas of SU-01 and SU-02.

6.5. Results

No Aboriginal sites or objects were identified during the archaeological survey. No trees exhibiting evidence of cultural modification were identified and it was assessed that all trees on site were planted following the establishment of the data centre site in the 1990s. It was identified that the entirety of both survey units SU-01 and SU-02 had been heavily disturbed. Evidence of terracing and levelling was present across much of the Project Area, with high degree of ground disturbance near to all present buildings and areas of artificial ground surfacing (Figure 5-2, Figure 5-3 and Figure 5-4). No permanent water sources were identified within the Project Area and it was assessed that Strangers Creek has been subjected to substantial modification, including alterations to formalise the channel and the addition of a fountain (Figure 5-5). Grasses and other landscaping have extensively covered the ground and limited ground visibility, with visibility across the Project Area being less than ten per cent.

Some small areas of exposure were identified within the Project Area, particularly in Survey Unit SU-01, where subsurface hydrogeological processes (likely made more extensive by past earthmoving activities) and the passage of vehicles had resulted in wheel ruts and sinkholes. The soil profile that was observed in the section of the wheel ruts and sinkholes consisted of a mid-brownish grey silty clay with a high degree of mottling with darker brown and black material, consistent with the soil landscapes identified within the Project Area (Figure 5-6 and Figure 5-7). Fragments of concrete, brick, shale and sandstone within the section indicated this was a substantially disturbed soil horizon, likely associated with the earthworks necessary to level the site for the original construction of the data centre building (Figure 5-8).

Recently excavated geotechnical examination pits were also identified throughout both SU-01 and SU-02, with scattered subsurface material recovered from the pits remaining on the surface (Figure 5-9 and Figure 5-10). Some areas of exposure contained fragments of shale, sandstone and ironstone, though none of these demonstrated any signs of cultural modification. Further fragments of concrete and brick, located in close association with the scattered stone fragments, indicate that these areas are most likely associated with previous ground disturbing activities and do not represent an original ground surface.

Additional areas of ground exposure were identified at the top of a slope that forms the terraces to the north of the existing data centre building (Figure 5-11). Exposed soil within this area consisted of a mid-yellowish brown silty clay with fragments of shale, sandstone, ironstone, concrete and brick throughout (Figure 5-12 and Figure 5-13). This material was also identified along the boundary of the Project Area adjacent to the road corridor and footpath along Brookhollow Avenue (Figure 5-14), confirming the photographic evidence from the historical aerial images that earthmoving had occurred within these areas and that the slope and terracing are likely the product of construction works during the 1990s.

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The areas of boundary plantings demonstrated significant evidence of ground disturbance, with recent pitting and animal burrows present throughout the area in both SU-01 and SU-02 (Figure 5-15, Figure 5-16 and Figure 5-17). Modern refuse, including plastic sheeting and fragments of brick and concrete, was identified to be embedded within the topmost 50 mm to 100 mm of the ground surface in areas closer to the road corridor of both Brookhollow Avenue and Norwest Boulevard (Figure 5-18). It was noted that historical aerial images showed the boundary plantings to postdate the construction of the data centre in the 1990s. Therefore, the survey confirmed that this area had been subjected to ground disturbance.

Due to the comprehensive evidence of ground disturbance across the entirety of the Project Area, no areas of Potential Archaeological Deposit (PAD) were identified.

Table 5-4: Photographic evidence (J. Giang & M. Hedges 2025)

Photograph	Description
	Figure 5-2: View across the terrace to the north of the data centre building. Located within SU-02, facing east.
	Figure 5-3: View across the carpark and up the slope to the terracing to the north of the data centre building. Located in SU-01 and SU-02, facing north.

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Photograph

Description



Figure 5-4: View across the slope and terracing to the north of the data centre building. Located within SU-01, facing east.



Figure 5-5: Evidence of modification of Strangers Creek, including terracing of the banks of the watercourse to formalise the channel. Located within SU-01, facing southwest.



Figure 5-6: The sinkhole located to the southeast of the data centre building. Located within SU-01, facing west.

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Photograph

Description



Figure 5-7: Section of the sinkhole to the southeast of the data centre building, showing the soil profile. Located within SU-01, facing southeast.



Figure 5-8: Partially embedded concrete fragment south of the data centre building. Located within SU-01, facing east.



Figure 5-9: Location of recently excavated geotechnical examination pit. Located within SU-02, facing east.

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Photograph

Description



Figure 5-10: Location of recently excavated geotechnical examination pit. Located within SU-02, facing northwest.



Figure 5-11: Area of exposure at top of terrace. Located in SU-02, facing west.



Figure 5-12: Concrete fragments within area of exposure at top of terrace. Located in SU-02, facing north.

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Photograph

Description



Figure 5-13: Ground surface and fragments of stone, brick and concrete within area of exposure at top of terrace. Located in SU-02, facing east.



Figure 5-14: Ground surface and fragments of stone, brick and concrete within area of exposure along edge of Brookhollow Avenue. Located to the east of SU-02, facing east.



Figure 5-15: Areas of pitting and animal burrows within the area of boundary plantings along Brookhollow Avenue. Located in SU-02, facing southwest.

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Photograph

Description



Figure 5-16: Disturbed soil within the area of boundary plantings along Brookhollow Avenue. Located in SU-02, facing north.



Figure 5-17: Disturbed soil and terracing within the area of boundary plantings along Brookhollow Avenue. Located in SU-02, facing northwest.



Figure 5-18: Fragments of brick and concrete embedded in the ground surface within the area of boundary plantings along Brookhollow Avenue. Located in SU-01, facing northwest.

6.5.1. Survey coverage

In accordance with the Code of Practice (DECCW 2010a) archaeological surveys must determine the visibility and exposure present within each survey unit, the Code of Practice defines visibility and exposure as:

Visibility:

Visibility is the amount of bare ground (or visibility) on the exposures which might reveal artefacts or other archaeological materials. It is important to note that visibility, on its own, is not a reliable indicator of the detectability of buried archaeological material. Things like vegetation, plant or leaf litter, loose sand, stony ground or introduced materials will affect the visibility. Put another way, visibility refers to 'what conceals' (see also Burke and Smith 2004: 78–80, NPWS 1999).

Exposure:

Exposure is different to visibility because it estimates the area with a likelihood of revealing buried artefacts or deposits rather than just being an observation of the amount of bare ground. It is the percentage of land for which erosion and exposure was sufficient to reveal archaeological evidence on the surface of the ground. Put another way, exposure refers to 'what reveals' (see also Burke and Smith 2004: 78–80, NPWS 1999).

A summary of the results of the survey can be found in (Table 5-5), with a summary of landform coverage is provided in Table 5-6. In accordance with the Code of Practice visibility and exposure have been rounded to the nearest 10%.

Table 5-5: Survey coverage

Survey Unit	Landform	Survey Unit area (sqm)	Visibility %	Exposure %	Effective Survey Coverage (sqm)	Effective Coverage %
SU-01	Lower slopes	25,922.5	10	10	25.92	0.1
SU-02	Lower slopes	25,922.5	10	10	25.92	0.1

Table 5-6: Landform coverage

Landform	Landform area (sqm)	Area effectively surveyed (sqm)	% landform surveyed	Number of Sites	Number of artefacts or features
Lower slopes	51,845	25.92	0.1	0	0

6.5.2. Discussion

The entirety of the Project Area was found to have been subjected to a high degree of historical ground disturbance, including earthmoving to terrace and level the site for the original construction of the data centre building, carparks and associated landscaping. Modification of the ground surface was identified to be comprehensive, and it was not considered likely that natural soils were present anywhere within the Project Area.

No Aboriginal sites or objects were identified during the survey. Whilst a number of large trees were observed within the Project Area, past land clearing practices has reduced the likelihood of culturally modified trees occurring and no signs of cultural modification were identified.

As a result of the survey, it has been determined that no further archaeological investigations are required due to the extensive ground disturbance identified across the Project Area, which likely removed and/or significantly disturbed any intact soil profiles with potential to contain archaeological deposits. Evidence of terracing and levelling was observed throughout, indicating significant landscape modification. Additionally, no permanent water source was identified within the Project Area. Strangers Creek, located nearby, has undergone substantial modification, including formalisation of the channel and the installation of a fountain, further reducing the area's archaeological potential. The sinkholes and exposures noted during the survey present a potential geotechnical constraint not a cultural heritage one, therefore are not addressed here.

7. Significance Assessment

7.1. 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 to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (the Guide) (OEH 2011: 10) provides guidelines, in accordance with the Burra Charter (Australia ICOMOS 2013) and the Heritage NSW (Heritage Office 2001) 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 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 and will be considered in the ACHAR. This ATR only presents the scientific or archaeological significance of each site. Ratings are unknown, low, moderate or high.

7.2. Scientific significance

No Aboriginal objects or places have been identified within the Project Area, which has been assessed as having low archaeological potential and sensitivity and is of no scientific significance (Table 7-1).

Table 7-1: Summary of scientific significance

Site (AHIMS ID)	name	Research value	Education potential	Representative value	Rarity	Overall significance	scientific
N/A		None	None	None	None	None	

8. Impact assessment

8.1. Proposed works

The proposed works include a two-stage data centre project. Stage 1 involves upgrades to the existing facility and will include:

- Minor site preparation works including tree clearing and bulk earthworks;
- Civil earthworks and the installation of relevant servicing infrastructure and utilities;
- Construction of a four (4) storey data centre with roof top plant, equating to an RL 130 and Gross Floor Area (GFA) of 16,191m²;
- Installation of 77 x diesel fuel generators and associated diesel storage
- Provision of on-site car parking for approximately 25 spaces; and
- Landscaping and offset tree planting.

8.2. Likely impacts

No Aboriginal objects or areas of PAD have been identified therefore it assessed that no impacts to Aboriginal objects or sites are anticipated.

8.3. Cumulative impact

A cumulative impact is the combined effects of environmental or social impacts that occur because of a range of activities or developments within a particular local area or region that impact on Aboriginal cultural heritage. Ideally cumulative impacts should be assessed from a baseline of data relating to the incremental impact of the actions of a development when added to other past, present and reasonably foreseeable future impacts.

The Project Area has been subject to extensive disturbance and there is very low potential for any Aboriginal archaeology to occur, therefore the proposed works are unlikely to impact Aboriginal objects or sites. Therefore, the proposed development will not contribute to a cumulative impact on Aboriginal cultural heritage. The Project Area is of low archaeological potential, and no Aboriginal sites or objects

were identified during the assessment. As such, when considered alongside previous and anticipated developments in the surrounding area, the proposed works are unlikely to result in a cumulative loss or degradation of Aboriginal heritage values. Ongoing application of the Unexpected Finds Protocol will further mitigate any residual risk.

9. Conclusions and recommendations

This ATR has been prepared in accordance with the *Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010a). The assessment found that Aboriginal objects are unlikely to be present within the Project Area. Therefore, no Aboriginal objects or sites will be subject to unavoidable harm by the proposed works. However unexpected Aboriginal objects remain protected under the NPW Act, therefore a series of management and mitigation measures are recommended.

These recommendations were based on consideration of:

- Statutory requirements under the *National Parks and Wildlife Act 1974* (NSW)
- The results of the background research and archaeological survey results
- The currently known nature of impacts of the Project.

If modifications are made to the design or scope of the project further assessment may be required. A summary of the recommendations is provided in Table 9-1.

Table 9-1: Recommended management and mitigation measures

Mitigation Measure	Site/ scope	Summary
ACHAR	Project	SSD applications must be supported by an ACHAR, prepared in accordance with the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (the Guide) (OEH 2011)
Aboriginal Community Consultation	Project	The ACHAR must be supported by Aboriginal community consultation undertaken in accordance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW 2010b)
Heritage Induction	Project Area	A Heritage Induction should be provided to all staff working in the Project Area, to appraise them of the Aboriginal heritage values of the Project Area and Unexpected Finds Procedure.
Unexpected Finds Procedure	Project Area	An Unexpected Finds Procedure must be prepared for the project and presented to all staff working on site as part of the Heritage Induction.

9.1. Recommendations

9.1.1. Guiding principles

The overall guiding principle for cultural heritage management is that where possible, Aboriginal sites should be conserved. If conservation is not practicable, measures should be taken to mitigate impacts to Aboriginal sites. Conservation through avoidance of Aboriginal sites can be achieved through such measures as:

- Design change
- Buffering and exclusion zones
- Construction Environmental Management Plans which include Aboriginal heritage
- Cultural heritage awareness training.

This results of the archaeological survey did not identify any Aboriginal sites or areas of PAD. The Project Area was found to be highly disturbed resulting in the removal and or modification of upper soil profiles. Therefore, the Project Area has very low potential to contain any sub-surface archaeological materials. The proposed works are considered highly unlikely to result in impact to Aboriginal cultural heritage, therefore no further archaeological investigations are recommended.

The following sections provide recommendations as a precaution and to harmonise the Project with surrounding cultural values:

9.1.2. Recommendation 1 - Aboriginal community consultation

In accordance with the Consultation Requirements (DECCW 2010a), up-to-date consultation must be maintained by the Client or representing Archaeologist with the RAPs during the approvals process. Should six months lapse without contact with the RAPs, the consultation process will no longer be considered current by Heritage NSW and they may request that the Consultation Requirements (DECCW 2010a) process be restarted.

9.1.1. Recommendation 2 - Heritage Induction

A Heritage Induction should be provided to all staff working in the Project Area, to appraise them of the Aboriginal heritage values of the Project Area and Unexpected Finds Procedure.

The Heritage Induction should also include a summary of obligations and liabilities for impacting Aboriginal sites without appropriate authorisation.

9.1.2. Recommendation 3 - Designing with connecting with country framework

In accordance with the ESD intergenerational principle, it is recommended that GSDC incorporate Aboriginal cultural heritage values that acknowledges the Darug people and the land on which the Project Area stands. For NSW built environment projects, this can be achieved through the use of the Connecting with Country framework (Government Architect New South Wales 2023) to help guide design principles. It is understood that the design has yet to be finalised for this Project, thereby offering ample opportunity for Aboriginal community consultation. Further engagement should be undertaken to adhere to the Connecting with country framework. The results of community engagement may be in the form of:

- Heritage interpretation boards – temporary or permanent, within or outside the Project Area.
- Cultural heritage awareness talks by Darug people.

It is acknowledged that GSDC may already implement the ESD intergenerational principle in some form or through the above strategies.

9.1.3. Recommendation 4: Unexpected finds

Unexpected Aboriginal objects remain protected by the *NPW Act*. If any such objects, or potential objects, are uncovered in the course of the activity, work in the vicinity must cease, the project archaeologist Heritage NSW, and Deerubbin LALC be contacted for advice.

9.1.4. Recommendation 5: Discovery of human remains

If suspected human remains are discovered and/or harmed in, on or under the land within the Project Area, the following actions must be undertaken:

- The remains must not be harmed/further harmed

- Immediately cease all works at that particular location
- Secure the area to avoid further harm to the remains
- Notify the NSW Police and the Environment Line (Heritage NSW) on 131 555 as soon as practicable and provide any details of the remains and their location
- Do not recommence any work at that particular location unless authorised in writing by Heritage NSW.

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Appendix 1: AHIMS search results

Redacted

Appendix E – Unexpected Finds Procedure

1. Unexpected Finds Procedure

A comprehensive set of Aboriginal unexpected finds procedures have been prepared to address potential heritage discoveries these include:

- Aboriginal Objects
- Human Remains

1.1. Aboriginal

1.1.1. Aboriginal Objects

Aboriginal object may include but are not limited to middens, scarred trees, stone artefacts, hearths and burnt clay. Examples of Aboriginal objects is provided in Section 1.2. If potential Aboriginal objects are identified the following steps must be followed:

- Works in the vicinity of the potential find must be halted
- An exclusion zone of 10m established around the potential object
- The Heritage Consultant and RAPs must be informed and assess the find.
- If it is determined that no Aboriginal site is present, or impacts can be avoided works may proceed with caution.
- If Aboriginal objects are present, and impacts cannot be avoided, appropriate mitigation measures must be established in consultation with RAPs
- Heritage NSW and the RAPs must be informed of all unexpected finds,
- If an Aboriginal site is identified a site card must be prepared and the site must be registered on AHIMS.

1.1.2. Human Remains

If potential human remains are identified the following steps should be taken:

- Works in the vicinity of the potential find must be halted
- An exclusion zone of 10m established around the potential object

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- The Heritage Consultant must be contacted to assess the find.
- If the Heritage Consultant determines that the remains are not human, works may proceed
- The Heritage Consultant determines that the remains are human NSW police and heritage NSW must be contacted.

1.2. Examples

The following examples of unexpected Heritage Items are taken from the Transport for NSW Unexpected Finds Procedure (Transport for NSW 2002), they do not represent a comprehensive typology and should only be used for preliminary identification.

