

Project Mars Data Centre - 12 Mars Road, Lane Cove West

Aboriginal Cultural Heritage
Assessment Report

LGA: Lane Cove

Report to Goodman Property Services
(Australia) Pty Ltd

December 2025



 artefact

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Document history and status

Revision	Date issued	Reviewed by	Approved by	Date approved	Review type	Revision type
1	28 February 2025	Ryan Taddeucci	Josh Symons	11 March 2025	Internal	Draft
2	25 March 2025	Athena Vercoe		26 March 2025	External	Draft
3	31 March 2025	RAPs			External	Draft
4	21 July 2025	Artefact Heritage	Artefact Heritage	21 July 2025	Internal	Final
5	17 September 2025	Artefact Heritage	Artefact Heritage	17 September 2025	Internal	Final v2
6	5 December 2025	Artefact Heritage	Artefact Heritage	5 December 2025	Internal	Rev B - Formal Submission

Last saved:	5 December 2025
File name:	ACHAR-240477-12 Mars Road-Final v4-5.12.2025
Author:	Kieran Murray
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Name of organisation:	Artefact Heritage and Environment Pty Ltd
Name of project:	Project Mars Data Centre - 12 Mars Road, Lane Cove West
Name of document:	Project Mars Data Centre - 12 Mars Road, Lane Cove West – Aboriginal Cultural Heritage Assessment Report
Document version:	Rev B Formal Submission

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EXECUTIVE SUMMARY

This Aboriginal Cultural Heritage Assessment Report (ACHAR) has been prepared by Artefact Heritage and Environment to accompany a State Significant Development Application (SSDA) for the construction and ongoing operation of a data centre facility at 12 Mars Road, Lane Cove West in the Lane Cove Government Area (LGA). The site is legally described as Lot 22 in Deposited Plan 732062.

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the Project Mars Data Centre Project (SSD-82052708) dated 10th April 2025.

An Aboriginal Technical Report (ATR) was prepared to identify Aboriginal objects or places within the study area and assess the scientific significance of any Aboriginal objects or places. Based on the environmental background of the study area as well as previous archaeological investigations a series of predictive statements were prepared for the Aboriginal Technical Report:

- Aboriginal sites in the local area tend to be located within 100m of watercourses. The study area is located within 100m of the former Stoney Creek.
- Extensive historical disturbance has likely greatly impacted the study area reducing the likelihood for Aboriginal objects and in-situ soil deposits to be present
- Land with the least amount of historical ground disturbance has the greatest potential for artefact bearing deposits. The southern portion of the study area has the greatest potential to retain Aboriginal objects based on the background research.
- Native vegetation has been cleared therefore culturally modified trees will not be present within the study area
- If sandstone outcrops or rock shelters are present within the study area, they are more likely to be present at the southern extent of the study area nearby to the former Stoney Creek and known Aboriginal sites where the landform is undisturbed.

The ATR identified Mars Rd Potential Archaeological Deposit 1 based on the natural, undisturbed nature of the landform following the archaeological survey, consultation with the Metropolitan LALC, and background research.

This ACHAR found that:

- An extensive search of the AHIMS database identified several registered Aboriginal sites within a similar landform to the study area within the AHIMS search area
- No previously unrecorded Aboriginal objects were identified within the study area during the archaeological survey. Archaeological survey, consultation, and background research have resulted in the identification an area of archaeological potential; Mars RD PAD1, based on the undisturbed nature of the area and nearby sites within the same landform. This PAD is located in the southern end of the study area
- Mars Rd PAD1 will not be impacted from the proposed works based on the proposed site layout

- All areas impacted by the proposed works are located within a disturbed terrain. Archaeological survey and background research have indicated that there would be no impact on Aboriginal objects.

Recommendations

Based on the findings of this assessment, the following recommendations are made:

Ref.	Description
AH1	All relevant construction staff, contractors and subcontractors must be made aware of their statutory obligations for heritage under the NPW Act and the SSD Conditions of Approval to ensure no archaeological objects are impacted during the proposed works without appropriate mitigation measures in place. This is to be implemented through a heritage induction carried out prior to works commencing and continued throughout the works program as staff are inducted to the site. This would include details on the location of nearby Aboriginal sites and the Unexpected Finds Procedure.
AH2	As Mars Rd PAD1 will not be impacted by the proposed development, no further archaeological investigation is proposed. The project would be managed under an Unexpected Finds Procedure that must be developed and implemented for the project and would be documented in the Construction Environmental Management Plan. Further archaeological investigation and consultation with registered Aboriginal parties must be undertaken should designs change and works are proposed within the identified extent of Mars Rd PAD1.
AH3	The site extent of Mars Rd PAD1 should be shown on the proponent's Environmental Control Maps for the knowledge of all workers during the course of works.
AH4	Management of Aboriginal cultural heritage values must be carried out in compliance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (Consultation Requirements) (Department of Environment, Climate Change and Water (DECCW 2010b). Consultation with Aboriginal stakeholders in relation to Aboriginal heritage management must continue through the project where necessary, including involvement in the management of Aboriginal objects and the discovery of any Aboriginal unexpected finds.

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NOTE ON LANGUAGE IN QUOTES

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

GLOSSARY OF TECHNICAL TERMS

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

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

AHIMS: Acronym for 'Aboriginal heritage information management system'. AHIMS is a register that contains information about NSW Aboriginal heritage.

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

Artefact: An item of cultural material created by humans.

Artefact scatter: Where two or more stone artefacts are found within an area of potential archaeological deposit or a site.

Bedrock: A consolidated rock that is unbroken and un-weathered, located beneath soil or rock fragments.

Clay: A type of sediment with particles less than 4 microns in size and that is composed of clay minerals (Keary 2001, p. 49).

Cortex: The outer weathered surface of stone; if smooth, it can indicate the source of stone was a pebble.

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

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

Footprint: The scale, extent or mark that a development makes on the land in relation to its surroundings.

Holocene: The Holocene epoch forms part of the late Quaternary period and extends from about 11,000 years ago to the present day.

In situ: A description of any cultural material that lies undisturbed in its original point of deposition.

Layer: In stratigraphy, it is used to describe a horizon (soil, rock, charcoal) that is distinct from its surrounds.

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

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

Sand: A material composed of small grains (0.625-2.0 mm) (Keary 2001, p. 233). Sand is formed from a variety of minerals and rocks, but commonly contains silica, such as quartz.

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

Scarred trees: Trees that feature Aboriginal derived scars are distinct due to the scar's oval or symmetrical shape and the occasional use of steel, or more rarely, stone axe marks on the scar's surface. Scarred trees are identified by the purposeful removal of bark for use in the manufacture of artefacts such as containers, shields and canoes. The bark was also used for the construction of shelters. Other types of scarring include toeholds cut in the trunks or branches of trees for climbing purposes and the removal of bark to indicate the presence of burials in the area.

Stratigraphy: The study of soil stratification (layers) and deposition.

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

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

1.0 INTRODUCTION

1.1 Project brief

Goodman Property Services (Australia) Pty Ltd engaged Artefact Heritage and Environment (Artefact) to prepare an Aboriginal Cultural Heritage Assessment Report (ACHAR) for the proposed works at 12 Mars Road, Lane Cove West (Figure 1) which includes the construction and operation of a 90MVA Data Centre. This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the Project Mars Data Centre Project (SSD-82052708) dated 10th April 2025.

A State Significant Development Application (SSDA) has been prepared to support a data centre at 12 Mars Road, Lane Cove West. The site area is 33,559m² and is zoned E4 General Industrial.

The proposal will include:

- Site preparation works including demolition, bulk excavation and removal of existing
- structures on the site, tree and vegetation clearing and bulk earthworks.
- Construction, fit-out and operation of a three-storey data centre building with a total
- gross floor area of approximately 21,832m² comprising:
 - 24 parking spaces
 - 2 loading dock spaces
 - 2 levels of technical data hall floor space
 - 3 level office and amenities building
- Provision of required utilities including:
 - diesel storage tanks
 - water tanks
 - substations on site
- Vehicle and pedestrian access provided via Mars Road
- Associated landscaping and site servicing
- Installation of site services and drainage infrastructure
- A floor space ratio of approximately 0.65:1.

1.2 Description of the study area

The study area is located at 12 Mars Road, Lane Cove West, also known as Lot 22 DP732062, within the Lane Cove Local Government Area (LGA). The study area is bounded to the north by Mars Road, east and south by residential and commercial car parking, and to the west by commercial property. The study area is within the boundaries of the Metropolitan Local Aboriginal Lan Council (LALC).

1.3 Aims and objectives

This ACHAR has been prepared to support the EIS submission for the 12 Mars Road Data Centre aligning with the anticipated Aboriginal heritage requirements of the SEARs.

The aims of this report are to:

- Assess the Aboriginal cultural heritage values of the study area, including archaeological and community cultural values, and the significance of identified values, as required by the SEARs
- Identify Aboriginal cultural heritage values that may be impacted by the proposed works, including consideration of cumulative impacts, and measures to avoid significant impacts required by the SEARs
- Ensure appropriate Aboriginal community consultation in the assessment process, as required by the SEARs
- Identify any recommended further investigations, mitigation and management measures required, in compliance the SEARs

To fulfil these aims, the following will be undertaken:

- Conduct a comprehensive desktop research and formulating a predictive model regarding the nature and location of Aboriginal objects
- Validate the predictive model through on-site field investigations
- Consult with the Aboriginal community to acquire information for assessing the significance of identified Aboriginal sites or objects
- Analyse design plans to ascertain potential harm to recognised Aboriginal sites or objects

Figure 1: The study area



1.4 Secretary's Environmental Assessment Requirements (SEARs)

The development proposal will be submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) for consideration as an SSD Under Part 4.1 of the Environmental Planning and Assessment Act 1979. This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the Project Mars Data Centre Project (SSD-82052708) dated 10th April 2025. Appendix A – Technical report contains the full legislative context for this report.

2.0 SUMMARY OF CONSULTATION

2.1 Stage 1

2.1.1 Agency letters

In accordance with Section 4.1.2 of the Consultation Requirements, Artefact Heritage corresponded with the following organisations by email on 7 November 2024 requesting the details of Aboriginal people who may hold cultural knowledge relevant to determining the Aboriginal significance of Aboriginal objects and/or places within the local area:

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

The due date for responses was 21 November 2024.

2.1.2 Advertisement

In accordance with Step 4.1.3 of the consultation requirements, an advertisement was placed on 18 November 2024 in Buy, Search, Sell. The advertisement invited all Aboriginal persons and organisations who hold cultural knowledge relevant to determining the significance of Aboriginal objects and places in the study area to register their interest by 2 December 2024.

2.1.3 Registration of Aboriginal parties

In accordance with Step 4.1.3 of the consultation requirements, letters/emails were sent on 25 November 2024 to all Aboriginal persons or organisations identified through responses from agencies contacted as part of Step 2.1.1. The letters provided details about the location and nature of the proposal and an invitation to register as an Aboriginal stakeholder. The registration of interest for the project was due 9 December 2024. Five groups were registered for the project. The list of the Registered Aboriginal Parties (RAPs) is provided in Table 1. This list of RAPs has been provided to the Metropolitan LALC and to Heritage NSW.

Table 1: List of registered stakeholders

Group	Name
[Redacted content]	

Group	Name
[Redacted]	

2.2 Stage 2

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

2.3 Stage 3

A copy of the proposed assessment methodology was sent to the RAPs by Email on 12 December 2024, requesting feedback by 14 January 2025. The draft assessment methodology presented information about the project and invited feedback on the cultural significance of the area. A summary of the comments received by Artefact is presented in Table 2.

Table 2. Summary of Aboriginal stakeholder comments on the Assessment Methodology

Person / RAP group	Comment	Response
[Redacted]	No problems from our end with the methodology towards 12 Mars Road Lane Cove.	Noted.
[Redacted]	I have reviewed the document and fully support the information and methodology.	Noted.

2.4 Stage 4

A copy of the draft ACHAR was sent to the RAPs by email on 31 March 2025, requesting feedback by 28 April 2025. No responses or comments on the draft ACHAR were made.

2.5 RAP Notification of Updated Draft

An updated version of the draft ACHAR was issued to the RAPs on 5 December 2025, notifying them that their comments on the previous document have been implemented and that minor changes have taken place to the proposal since the report was last issued.

3.0 SUMMARY AND ANALYSIS OF BACKGROUND INFORMATION

3.1 Aboriginal History

After the massive dispossession of Country by the British colonists from 1788 and the smallpox epidemic of 1789, traditional Aboriginal society was decimated. Few historical records by early colonisers are accurate or reliable, often misunderstanding Aboriginal culture and land tenure. While it is difficult to determine precisely, the Cammeraygal people have been associated with Country around what is now known as Willoughby, Lane Cove, Ku-ring-gai and North Sydney Council areas as well as Mosman. 'Cammeray' is the name of the area to which the people belonged and the addition of 'gal' refers to the people from that place. The Cammeraygal clan group may have taken their name from the *camy*, a common term for a spear in the Sydney area (they were regarded as a fierce and war-like clan).

Governor Arthur Phillip rather vaguely noted that the Cammeraygal (Gammeraigal) inhabited 'the northwest side of Port Jackson'. North Sydney Historian Ian Hoskins notes this is 'now thought to extend from Cremorne in the east, to Woodford Bay in the west, and probably to Middle Harbour which forms a natural boundary to the north'. Phillip also referred to a group called the Wallumedegal as occupying the 'opposite shore' (to Sydney Cove). Hoskins and others consider the Wallumedegal clan group to have extended from Lane Cove westward to Parramatta and the Borogegal clan to have lived around Bradleys Head. Further to the north, it seems the Garigal lived on the southern edges of Broken Bay (Hoskins 2019: 3; Currie 2008: 33).

There has long been confusion around the language spoken on the north shore of Sydney Harbour (as elsewhere across Sydney, the colonists often misinterpreted Aboriginal people or failed to ask pertinent questions). As Jessica Currie notes in her history of the area around Willoughby, *Bo-ra-ne Ya-goo-na Par-ry-boo-go. Yesterday Today Tomorrow*, 'it has been long accepted that the Cammeraygal clan are part of the Guringai language nation, however, there are also claims that the Darug language extended through this area.' The 2015 Aboriginal Heritage Office report 'Filling a void – Guringai language review' notes that the first use of the word 'Guringai' was in 1892 and was based on a Hunter Valley group 'Gringai or Guringay' in an attempt to fill a void in language information to the north of Sydney. More recent research has identified Karikal or Garigal as the clan group associated with the southern side of Broken Bay. The term 'Kuringai' (Guringai) has now been rejected by the Aboriginal Heritage Office and other researchers (AHO 2015: 40-41; Currie 2008: 3; Attenbrow 2010: 22-25; Collins 1798: 453; Smith 2006: 10)

As Currie also notes, 'as the Aboriginal population in the Willoughby area was severely diminished following the British occupation in 1788, oral accounts of the Cammeraygal available to us today are all but non-existent.' Today, much of what we know about the traditional lives of Aboriginal people on the north shore of Sydney Harbour comes from the often imprecise and limited pens of colonial diarists such as Watkin Tench and David Collins (Currie 2008, p. 3).

However, the many ridgelines and spurs with creeks and rivers that over millennia gouged their way through sandstone and run into Sydney Harbour contain hundreds of sites that comprise physical archaeological evidence of Aboriginal people around Lane Cove and the North Shore. Before the British colonists arrived and began clearing the trees, the various creeks and rivers had created sheltered environments for plants and animals. It was in these areas where Aboriginal people lived for thousands of years, with the often-exposed ridgelines and sandstone outcrops more likely to have been travelling and hunting routes and ceremonial areas.

Along with the creeks and rivers, the coastline to the north of Sydney offered areas of abundant saltwater resources from present day Manly up to the Northern Beaches up to the southern shores of Broken Bay. A variety of fish were caught and rock oysters, cockles, mussels and clams were also consumed, opened either with a thumbnail or stone oyster hammer. Shell middens can still be seen in many places along the waterways of the north shore and along the Northern Beaches.

Inland, there were fruits, seeds, nuts, grains and nectars and rhizomes and tubers would have been important components of the staple diet for Aboriginal people. Some parts of plants would have required special preparation to remove any poisons, but the seeds of all native grasses are edible. The Melaleuca tree's paper-like bark was used as shelter, wrapping, containers and fire lighting (Currie 2008: 10-15).

While the coastal foreshores, beaches and coves were prolific food sources, the forests inland were less used. David Collins noted that 'the woods, exclusive of the animals which they occasionally find in their neighbourhood, afford them but little sustenance; a few berries, the yam and fern-root, the flowers of different banksia, and at times some honey, make up the whole vegetable catalogue' (Collins 1789). Collins overstates the distinction, but there was certainly a difference between inland Country and the economies of Aboriginal groups like the Cammeraygal, whose territories included foreshores.

In 1791 John Hunter described how Aboriginal burning the ground on the north side of the harbour, opposite the settlement', was a practice 'constantly' done when the weather was dry. 'Firestick farming' was the practice of burning land to create new green shoots and thereby attract kangaroos for hunting, but fire was also used to control undergrowth and prevent larger bushfires (Hunter 1793: 361).

Men used wooden spears and women wooden digging sticks - two of the most important possessions of Aboriginal people in the pre-colonial past. The other vitally important items for coastal women were fishing lines and fish hooks. Watkin Tench was especially impressed: 'the fish hooks are chopped with stone out a particular shell, and afterwards rubbed until they become smooth...considering the quickness with which they are finished the excellence of the work, if it be inspected, is admirable' (Tench 1789: 284).

Due to the predominance of relatively soft sandstone in the northern Sydney region, hard stone used for axes and scrapers in particular, was traded from areas such as the basalt gravel beds along the Nepean River. Trading was extensive and far-reaching. Silcrete from an outcrop near present day Plumpton Ridge on the Cumberland Plain in Sydney's west and mudstone from the Hunter Valley or near Warragamba dam have been found in Sydney's north. Numerous grinding grooves for sharpening stone can still be found in the northern suburbs of Sydney in close proximity to water sources or waterholes (Currie 2008: 15).

Along the ridges particularly behind the Northern Beaches there are large flat sandstone outcrops that still today have many significant engravings. Many, such as the cluster of engravings at 'Whale Rock' near Mona Vale Road, are located in prominent locations over the surrounding area with views to the north and south, demonstrating the connection between the 'Saltwater people' of the area and the surrounding region. Their locations on the ridge lines and the inclusion of *mundoes* (footprints) suggests connections between the engravings that have been called 'ancestral pathways' (Kelleher Nightingale 2015: 34; Symons and Welsh 2021, Pers. Comm.).

Today, there is significant remaining historical and archaeological evidence of the presence of Aboriginal people across the Northern Sydney region. An extensive Aboriginal pathway on the north shore probably became the route of the Pacific Highway of today and there was a 'well-marked pathway' that led from Manly to Pittwater. Waringa (Warringah) – noted in the 19th century as Middle Cove - is one of many Aboriginal words that remain in place names in the area. Others such as

Turranburra have been replaced (Lane Cove River) but the names survive in historical records (Currie 2008 :69; Karskens 2015; Larmer 1898 [1832]: 223-229).

Rock images in the northern Sydney region include kangaroos, wallabies, whales and emus. People and spiritual beings are also commonly represented along with tools and weapons such as spears, shields, digging sticks and boomerangs. Large engravings of the great sky spirit Baiami, his wife Birrahgnooloo and his son, alternatively known as his brother, Daramulan, can be found across the Sydney region with remarkable sites within the Lane Cove National Park and Ku-ring-gai Chase National Park.

Charcoal and ochre artworks are often found in rock overhangs and shelters, where they often remain well preserved. Drawings and stencils in charcoal and red, white and yellow ochre are common at sites in the lower north shore. These include white ochre fish and hand stencils, a red ochre eel, charcoal drawings of spirit figures and many others the subjects of which are no longer distinguishable. A source of high quality red and white ochre is known at North Head, approximately 12km east of the study area, however, exactly what sources were used by which clans is not known. Trading of high-quality ochre was common between clans and previous studies have shown that, like stone and other geographically specific resources, ochre can be traded over long distances (Currie 2008: 50).

In the Warringah, Willoughby, Lane Cove and North Sydney Local Government areas alone there are today approximately 1,000 Aboriginal sites including middens, rock engravings, axe grinding grooves, carved trees and stone arrangements. Several engravings depicting sharks can be found in the lower North Shore of Sydney, suggesting that these animals may have been particularly important to the Cammeraygal, and may have been a food source. Whales, fish and stingrays are also commonly depicted in rock engravings in the surrounding North Shore and Northern Beaches areas.

In fact, as North Sydney Historian Ian Hoskins notes, 'North Sydney's foreshore areas have some of the finest cultural sites on the lower north shore' with hand stencils and drawings still visible in caves and rock shelters. Two major engravings on Berry Island, approximately 5km southeast of the study area depict a large sea creature – possibly a fish or a whale. Nearby this is a small hollowed out rock basin with grinding grooves and an engraving on a sandstone platform near Balls Head shows a large whale or fish with a human figure inside. According to a Bundjalung man from the North Coast of NSW the man inside the whale 'is a clever fella' and the whale engraving was 'a place of ceremonies, a place where the whales were sung into the shore' (Hoskins 2015: 6-7). This is reflected within the AHIMS database where concentrations of hundreds of such sites are located along Lane Cove River and in proximity to the study area as discussed in section 3.3.

3.2 Archaeological background

Previous archaeological investigations nearby have focused on the connection between sites to the waterways of the Lane Cove River and the Stringybark Creek and their potential to yield Aboriginal sites. Previous investigations have recorded sites which are associated with the waterways such as rock shelters, art sites, shell middens, and engravings. However, these studies have also shown that historical ground disturbances have occurred across the area which consistently yield no Aboriginal sites and are found to have low to nil archaeological potential.

A summary of existing archaeological investigations and literature relating to the study areas local and regional archaeological context is summarised below.

Table 3: Summary of previous archaeological literature

Report	Summary
<p>Bronwyn Conyers, 1990, Lane Cove River State Recreation Area, Aboriginal sites planning study Survey.</p>	<p>Bronwyn Conyers conducted an Aboriginal heritage survey totalling 348 hectares of land along recreational areas parallel to Lane Cove River, north of the study area. The aim of the study was to identify Aboriginal sites and areas of archaeological potential to formulate recommendations to guide the management of the park's Aboriginal heritage. Many Aboriginal sites had previously been recorded in the survey area however several new sites were recorded as part of this survey. They included five potential habitation sites along the cliff lines and sandstone outcrops, three shelters with archaeological deposits and two shell middens. Several engraving sites were also re-surveyed along the ridgelines.</p>
<p>Artefact Heritage, 2016, Lane Cove Syphon, Hunters Hill, Due Diligence prepared for OMP alliance.</p>	<p>Artefact Heritage prepared a Due Diligence assessment for Lane Cove Syphon, Hunters Hill, approximately 500m west of the study area on the opposite side of the Lane Cove River. The subject area was situated within the Hawkesbury soil landscape. Based on the desktop assessment and survey the site was found to be heavily disturbed; no Aboriginal sites were identified. It was recommended that the study had low archaeological potential, and further assessment was not required.</p>
<p>Biosis 2019, 1 Sirius Road, Lane Cove, ACHAR prepared for Greenbox Architecture</p>	<p>Biosis prepared an ACHAR for 1 Sirius Road, located approximately 450 metres northwest of the study area, bounded by the Lane Cove River and Stringybark Creek. A survey was conducted with low overall effectiveness due to vegetation cover on the ground and limited areas of exposure. No previously unrecorded sites were identified, nor areas of archaeological sensitivity. The Metropolitan LALC site officer described that Aboriginal people have used the Lane Cove area in the past as an important place of trade or gatherings. The ACHAR also notes that the landscape is known to have been well utilised by Aboriginal people and is evidenced by a large number of registered sites in the area.</p>
<p>Comber Consultants 2020, 115 Tambourine Bay Rd, Riverview NSW, ACHAR prepared for Riverview Saint Ignatius College</p>	<p>Comber Consultants prepared an ACHAR for Riverview Saint Ignatius College, Tambourine Bay Road, Riverview NSW, located approximately 876m southeast of the study area. The subject area was situated within the Lambert soil landscape and disturbed terrain, 270 m north of and 250 m east of Lane Cove River foreshore. Survey indicated that the study area had 'been subject to significant disturbance and is not an area demonstrating archaeological potential for sub-surface artefact scatters.'</p>
<p>Artefact Heritage, 2022, 706 Mowbray Road West, Lane Cove North, Data Centre, Aboriginal Heritage Assessment, prepared for Arup.</p>	<p>Artefact Heritage prepared an Aboriginal Heritage Assessment for the proposed Mowbray Road Data Centre at 706 Mowbray Road West, Lane Cove North, approximately 1.8km northwest of the study area. The area was located approximately 230m to the east of Lane Cove River and approximately 100m to the north of Stringybark Creek within the Gynea and Lucas Heights soil landscapes. Two previously registered PADs were located within 200m of the subject area; however, no sites were identified within the subject area during the desktop assessment and survey. The assessment concluded the entirety of the area had been subject to past ground disturbance through the introduction of fill, construction of buildings, utilities, landscaping, concrete, and bitumen. Although the area was located within a 'culturally sensitive landform' in proximity to Lane Cove River, the subject area had been significantly modified that reduced the archaeological potential to nil. Further assessment was not recommended.</p>

Report	Summary
Artefact Heritage, 2024, 2-8 Lanceley place and 14 Campbell Street, Artarmon, ACHAR, prepared for Goodman Property Services.	Artefact Heritage prepared an ACHAR for 2-8 Lanceley Place and 14 Campbell Street, Artarmon, located approximately 3km east of the study area. The subject area was situated within the Glenorie and Disturbed Terrain soil landscape about 447m south of Gore Creek. Based on the desktop background and survey which did not identify any Aboriginal sites, the study area was found to be disturbed and to have a nil-low potential for Aboriginal objects to be located within it. It was therefore recommended that further assessment was not required.
Artefact Heritage, 2024, 618-624 Mowbray Road and 25-29 Mindarie Street, Lane Cove North, ACHAR prepared for Homes NSW.	Artefact Heritage prepared an ACHAR for 618-624 Mowbray Road and 25-29 Mindarie Street, Lane Cove North, located approximately 1.9km north of the study area. The subject area was situated within the Lucas Heights soil landscape. Based on the desktop background and survey which did not identify any Aboriginal sites, the study area was found to be disturbed and to have a nil-low potential for Aboriginal objects to be located within it. The ACHAR recommended that further assessment was not required.

3.3 AHIMS search

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

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) was undertaken on 5 December 2025 (Client Service ID: 1073903) to determine the location of Aboriginal sites in relation to the current study area. The search area measured approximately 2.25 kilometres by 2.25 kilometres surrounding the study area (Figure 2) inform the characterisation of the local archaeological context. The AHIMS search parameters were as follows:

GDA, Zone 56	327065 - 330320 6255470 - 6258730
Buffer	0 metres (m)
Number of sites	103

There are no AHIMS registered sites located within the study area in the AHIMS search results. The search identified 103 registered sites within the search area with the closest, AHIMS ID 45-6-2276 located approximately 30 metres south of the study area. AHIMS ID 45-6-2276 (Blackman Park 2) consists of a Shell; Artefact site, featuring a rock shelter with a slight midden deposit. AHIMS ID 45-6-2275 (Blackman Park 1) is located approximately 160 metres west of the study area and consists of a rock shelter with a slight midden deposit, the site card notes that there is much European rubbish dumped within the shelter. AHIMS ID 45-6-2277 (Blackman Park 3; SWA; SWD) is located approximately 215m south of the study area and is noted as a Shell; Artefact; Art (Pigment or Engraved) site and features what is described on the site card from 1991 as “mainly red ochre lizards, shield, boomerang and others, also charcoal figurines” with the recorders stating that “This would be the best surviving art site on the Lane Cove River”. The majority of AHIMS registered sites are Shell; Artefact sites (n=44, 42%). Many of the Artefact; Shell sites consist of rock shelters where middens have been found.

3.4 Environmental background

The study area encompasses three soil landscapes: Glenorie, Gymea, and Disturbed Terrain. The northern portion primarily consists of Glenorie soils, which include shallow to moderately deep red podzolic soils on crests and upper slopes. These soils are strongly acidic and highly erodible, making them unsuitable for preserving organic materials. Consequently, archaeological resources in this area are predominantly inorganic, such as stone artefacts. Due to erosion, in situ archaeological deposits are typically found at greater depths, with surface materials often displaced or destroyed.

The southern portion features the Gymea soil landscape, characterized by thin and patchy siliceous sands and rock outcrops. Occasional deeper sandy loams or clayey sands are found near shale lenses. These soils are prone to rapid runoff, are often water-repellent, and range from strongly acidic to slightly acidic. Loose litter in this landscape is vulnerable to bushfires, and up to 25% of the ground surface may be exposed bedrock, particularly on slopes descending to estuary shorelines.

At the southern tip lies the disturbed terrain of Blackman Park, where natural soils have been replaced with fill during land transformation for recreational use. This area has no remaining natural soils, as the site was cleared and levelled for amenities.

The geology of the study area is predominantly Hawkesbury Sandstone, a medium to coarse-grained quartz sandstone combined with minor shale and laminite lenses. The Hawkesbury Sandstone is overlaid by the Ashfield Shale and Bringelly Shale formations, which include dark grey shale, laminite, calcareous claystone, and lithic-quartz sandstone. The sandstone slopes may feature overhangs and minor shelters, with small soil deposits forming behind benches. However, erosion processes such as gully and sheet erosion, particularly after fires, have significantly impacted the landscape. While lithic resources are scarce within the bedrock, they may occur upstream. Artefacts on sandstone slopes are more visible due to erosion, though knapping concentrations are prone to rapid dispersal downslope. Grinding grooves and sandstone rock shelters, while significant site types, are unlikely to be present in the study area, as they are typically concentrated along undisturbed waterway banks.

The study area lies less than 35 metres north of the former Stoney Creek (now Blackman Park and Stony Gully), which historically flowed into the Lane Cove River. This proximity would have directed most rainfall runoff downslope into the river, contributing to water movement in the area. Pot-hole water storage, seepage from perched aquifers, and springs along the slopes of the Lane Cove margins likely provided vital potable water sources and supported food resources for local Aboriginal people. The Lane Cove River, situated approximately 350 metres west of the study area, is a microtidal estuary with a catchment covering 9300 hectares. This hydrology developed around 7500–8000 years ago due to marine transgression and estuarine flooding in the Pleistocene low sea level river tract.

The broader drainage patterns reflect inherited pre-incision landscapes, shaped as the Parramatta River system evolved eastward since the Oligocene. Variations in mean sea level from 7500 to 1500 years ago—when levels were up to 1.5 meters higher than today—affected the Lane Cove River margins upstream. Presently, tidal influence is limited by the Lane Cove Weir, located about 2 kilometres north of the study area. Historically, the tidal reach extended to De Burghs Bridge, 3.8 kilometres northwest.

The landforms in the study area reflect the geomorphology of the Lane Cove River, one of the four deeply incised estuaries dissecting Sydney's raised coastal margins. The terrain consists of undulating low hills, with a sandstone rock bench on the southern boundary. This area features rock shelters containing middens, evidencing Aboriginal occupation and use of the land.

3.5 Predictive model

The predictive model comprises a series of statements regarding the nature and distribution of evidence of Aboriginal land use that is expected in the study area. Based on a synthesis of information from the results of desktop research, landscape context and previous archaeological assessments inside and surrounding the study area, the following predictive statements are made:

- Aboriginal sites in the local area tend to be located within 100m of watercourses. The study area is located within 100m of the former Stoney Creek.
- Extensive historical disturbance has likely greatly impacted the study area reducing the likelihood for Aboriginal objects and *in-situ* soil deposits to be present
- Land with the least amount of historical ground disturbance has the greatest potential for artefact bearing deposits. The southern portion of the study area has the greatest potential to retain Aboriginal objects based on the background research.
- Native vegetation has been cleared therefore culturally modified trees will not be present within the study area
- If sandstone outcrops or rock shelters are present within the study area, they are more likely to be present at the southern extent of the study area nearby to the former Stoney Creek and known Aboriginal sites where the landform is undisturbed.

Figure 2: AHIMS registered sites



4.0 SUMMARY OF FIELD INVESTIGATIONS

An archaeological survey of the study area was completed on 12 November 2024 by Artefact personnel and a representative of the Metropolitan LALC in accordance with the *Code of Practice* (DECCW, 2010). All ground exposures were examined for Aboriginal objects and old growth trees were examined for signs of cultural scarring (as in scarred trees) and marking. A handheld GPS was used to track the path of the survey team and record coordinates of any identified Aboriginal sites or areas of interest. The study area was examined over two survey units defined by landform and access. The majority of the study area was heavily disturbed by cutting into the natural landform and underlying sandstone. The southern extent of the study area, given its minimal disturbance and location on a landform conducive to containing Aboriginal objects, and its proximity to other Aboriginal sites within similar landforms was identified as containing potential for rock shelters and Aboriginal objects.

No Aboriginal objects were identified during the archaeological survey in Survey Unit 1.

Survey Unit 2, while having the highest potential for containing Aboriginal objects, was inaccessible due to dense vegetation, steep slopes, and a barbed-wire fence that prohibited access during the survey.

Given its minimal disturbance, its location on a landform conducive to containing Aboriginal objects, and its proximity to other Aboriginal sites within similar landforms, Survey Unit 2 should be registered as a Potential Archaeological Deposit (PAD) with potential shelters.

Figure 3: Mars Rd PAD1



5.0 CULTURAL HERITAGE VALUES

5.1 Methodology

The cultural assessment in this report includes information collected through desktop assessment and Aboriginal community consultation undertaken in accordance with the Consultation Requirements. This information was collected by Kieran Murray (Heritage Consultant, Artefact Heritage).

5.1.1 Cultural landscape

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

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

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

5.1.2 Types of values

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

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

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

5.2 Identified Aboriginal cultural heritage values

Table 4 provides a summary of the Aboriginal cultural heritage values associated with the study area.

Table 4: Cultural heritage values identified for the study and surroundings

Cultural heritage value	Description	Source
Historical Landscape	Landscapes of the broader area adjacent to the Lane Cove river and the former Stoney Creek would have rich resources for Aboriginal occupation	ATR
Traditional cultural values	The Cammeraygal people have been associated with country the study area is situated on, around what is now known as Willoughby, Lane Cove, and broader North Sydney Council areas for thousands of years where cultural knowledge of language, travelling and hunting routes, and ceremony have been passed down through generations.	Currie 2008; Hoskins 2019
Traditional cultural values	Cammeraygal women demonstrated great skills and cultural knowledge of fishing and maritime resource collection within the broader local area along Lane Cove River and in Middle harbour.	Tench 1789
Traditional historic and cultural values	The various creeks and rivers around Lane Cove and the North Shore contain hundreds of sites that comprise physical archaeological evidence of Aboriginal occupation. The often-exposed ridgelines and sandstone outcrops more likely to have been travelling and hunting routes and ceremonial areas.	Currie 2008;
Traditional cultural values	Charcoal and ochre artworks are often found in rock overhangs and shelters, where they often remain well preserved. Drawings and stencils in charcoal and red, white and yellow ochre are common at sites in the lower North Shore. These include white ochre fish and hand stencils, a red ochre eel, charcoal drawings of spirit figures and many others the subjects of which are no longer distinguishable.	Hoskins 2015

5.3 Aboriginal cultural values within the study area

Scientific studies have demonstrated that Aboriginal people have lived in the area for tens of thousands of years, while many Aboriginal people themselves say they have been living on country since 'time immemorial'. The Lane Cove River, former Stoney Creek and the surrounding area is highly significant to Aboriginal people. While the broader landscape is significant to Aboriginal people through their connection to the land, no specific cultural values have been found to be associated with the study area.

No specific cultural heritage values for the study area were identified by RAPs as part of the consultation process.

6.0 SIGNIFICANCE ASSESSMENT

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

6.1 Significance assessment criteria

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

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

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

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

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

6.1.1 Historic value

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

No specific historic values have been identified within the study area, however, historical landscapes of the broader area adjacent to the identified waterways; the Lane Cove River and the former Stoney Creek are likely to contain outcrops with potential for historical Aboriginal heritage values.

No historic values for the study area were identified by RAPs as part of the consultation process.

6.1.2 Aesthetic value

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

No specific aesthetic values have been identified within the study area and it is assessed as being unlikely that any are present. No aesthetic values for the study area were identified by the RAPs as part of the consultation process.

6.1.3 Socio/cultural value

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

No specific socio/ cultural values have been identified within the study area and it is assessed as being unlikely that any are present. Additionally, no socio/cultural values for the study area were identified by the RAPs as part of the consultation process.

6.1.4 Scientific value

Archaeological significance refers to the archaeological or scientific importance of a landscape or area. This is established by using archaeological criteria such as archaeological research potential, representativeness and rarity of the archaeological resource and potential for educational values. It is important to note that heritage significance is a dynamic value and that new information or changes in community perception of a heritage resource may require its reevaluation. The archaeological significance of the study area cannot be accurately assessed until the results of further archaeological investigations into Mars Rd PAD1 are known. While much of the study area has been significantly disturbed, Mars Rd PAD1 is an area of archaeological potential due to its undisturbed nature in proximity to several other sites containing rock outcrops, rock engravings, and shell deposits on a similar landscape.

A summary of the archaeological significance of sites identified is presented in Table 5.

Table 5: Significance assessment

Site name (AHIMS ID)	Research potential	Representativeness	Rarity	Education potential	Overall significance assessment
Mars Rd PAD1	Unknown	Unknown	Unknown	Unknown	Unknown

6.2 Statement of significance

The broader landscape comprising the study area has a long history of Aboriginal occupation and utilisation. No specific historic, aesthetic or socio/cultural values were identified specific to the study area. Mars Rd PAD1 was identified due to it being a remnant area with outcropping sandstone which demonstrates archaeological potential based on previous investigations in the area.

7.0 IMPACT ASSESSMENT

7.1 Proposed works

A State Significant Development Application (SSDA) has been prepared to support a data centre at 12 Mars Road, Lane Cove West. The site area is 33,559m² and is zoned E4 General Industrial.

The proposal will include:

- Site preparation works including demolition, bulk excavation and removal of existing structures on the site, tree and vegetation clearing and bulk earthworks.
- Construction, fit-out and operation of a three-storey data centre building with a total gross floor area of approximately 21,832m² comprising:
 - 24 parking spaces
 - 2 loading dock spaces
 - 2 levels of technical data hall floor space
 - 3 level office and amenities building
- Provision of required utilities including:
 - diesel storage tanks
 - water tanks
 - substations on site
- Vehicle and pedestrian access provided via Mars Road
- Associated landscaping and site servicing
- Installation of site services and drainage infrastructure
- A floor space ratio of approximately 0.65:1.

7.2 Aboriginal heritage impact

Based on the configuration of the proposed development outlined in the masterplan below, Mars Rd PAD1 will not be harmed by the proposed works.

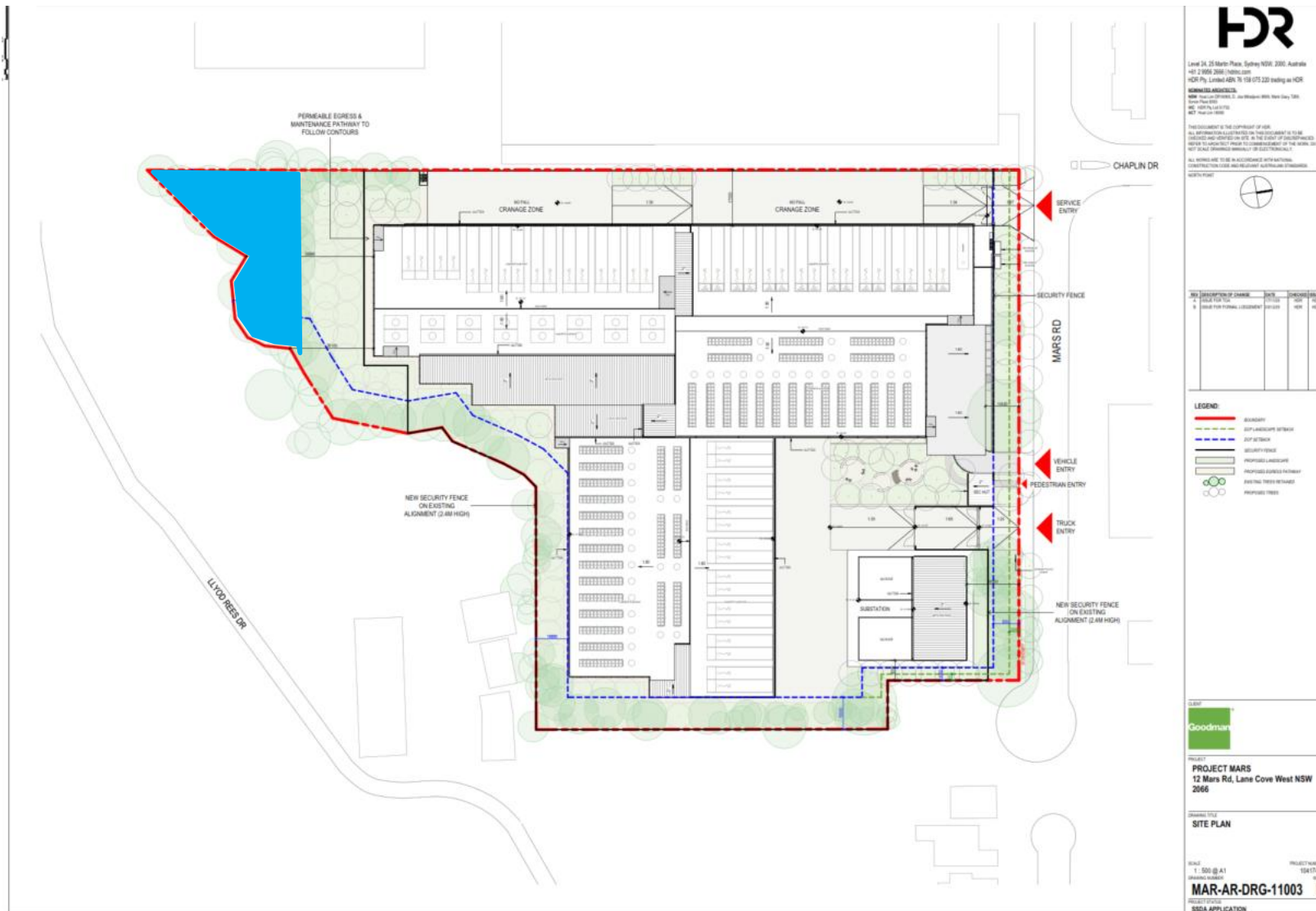
The area designated for the proposed works within the study area has no potential to impact Aboriginal objects, as there is no identified likelihood of their presence.

A summary of the impacts is provided in Table 6.

Table 6: Impact assessment

Site name (AHIMS ID)	Type of harm	Degree of harm	Consequence of harm
Mars Rd PAD1	None	None	No loss of value

Figure 4: Proposed works (General Arrangement Site Plan supplied by Goodman) with the location of Mars Rd PAD 1 shown in blue



7.3 Ecological Sustainable Development principles

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

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

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

7.3.1 The integration principle

The preparation of this ACHAR demonstrates regard for the integration principle by considering Aboriginal heritage values and impacts to these from the proposal during the planning phase. The nature of the proposal is in itself one that contributes to the long term economic and social needs of current and future residents of the area.

While Mars Rd PAD1 is present within the study area, impacts to the site are not proposed as the area will be retained for broader environmental reasons.

7.3.2 The precautionary principle

All reasonable steps under the regulations were completed to identify Aboriginal objects and gather data to assess significance. An unexpected finds protocol has been recommended to safeguard against uncertainty.

7.3.3 The principle of intergenerational equity

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

Preservation of Mars Rd PAD1 and any artefacts found to be within the site will be preserved for future generations. Preservation of the PAD affords future generations the opportunity to study the site, potentially using more advanced techniques than are currently available, resulting in better research outcomes.

7.4 Cumulative impacts

A cumulative impact is an impact on Aboriginal cultural heritage resulting from the incremental impact of the action/s of a development when added to other past, present and reasonably foreseeable future actions. The proposed works area within the study area has already been impacted by previous development, which has removed any Aboriginal objects that may have been present within the study area. Therefore, it is determined that no further cumulative impacts are possible in the area of proposed works. Mars Rd PAD1 will not be impacted by the proposed works and will be retained.

8.0 MANAGEMENT AND MITIGATION MEASURES

8.1 Guiding principles

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

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

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

- Low archaeological significance – conservation where possible. SSD Conditions of Approval would be required to impact the site before work can commence
- Moderate archaeological significance – conservation where possible. If conservation was not practicable, further archaeological investigation would be required such as salvage excavations or surface collection in accordance with the SSD Conditions of Approval.
- High archaeological significance – conservation as a priority. Where all other practical alternatives have been discounted mitigation measures such as comprehensive salvage excavations in accordance with the SSD Conditions of Approval would be required.

8.2 Proposed measures

Due to the significant disturbance to the whole of the study area, and there being no impacts from development to Mars Rd PAD1, no further archaeological investigation is proposed. The location of the site should be shown on the project Environmental Control Maps for the duration of the project so that the site extent is known to all relevant construction staff, contractors and subcontractors. A fence or barrier should be erected to avoid incidental harm to Mars Rd PAD1.

8.3 Unexpected finds procedure

An unexpected finds procedure must be developed and implemented during ground disturbing works. This would involve the following activities:

- A heritage induction for all contractors and site staff to provide an identification guide for Aboriginal stone tools
- Should Aboriginal objects be identified during ground disturbing works, the following protocol must be enacted:
 - All work must immediately cease in the area of, and around the location of the unexpected find

- The contractor supervisor must notify the environmental manager for the project, and a qualified archaeologist must be contacted to assess the provenance and significance of the find
- Should the find be an Aboriginal object, further consultation with RAPs, assessment and approval may be required before works can continue in that area.
- The site must be recorded on AHIMS and/or an Aboriginal Site Impact Recording Form (ASIRF) must be lodged as required.

8.4 Ongoing consultation with registered Aboriginal parties

Consultation with the RAPs would continue throughout the life of the project, as necessary. Consultation would continue in the event of any unexpected Aboriginal objects being identified during works. In accordance with the Consultation Requirements (DECCW 2010b), in order to remain active, consultation with RAPs should include communication with RAPs at no more than six monthly intervals.

8.5 Changes to the project area

Advice provided within this ACHAR is based upon the most recent information provided by the proponent at the time of writing. Any changes made to the project should be assessed by an archaeologist in consultation with the RAPs. Any changes that may impact on Aboriginal sites not assessed as part of the project may warrant further investigation and result in changes to the recommended management and mitigation measures.

9.0 CONCLUSION

9.1 Overview of findings

This assessment found that:

- An extensive search of the AHIMS database identified several registered Aboriginal sites within a similar landform to the study area within the AHIMS search area
- No previously unrecorded Aboriginal objects were identified within the study area during the archaeological survey. Archaeological survey, consultation, and background research have resulted in the identification an area of archaeological potential; Mars RD PAD1, based on the undisturbed nature of that portion of the study area, and nearby sites within the same landform
- Mars Rd PAD1 will not be impacted from the proposed works based on the proposed site layout
- All areas impacted by the proposed works are located within a disturbed terrain. Archaeological survey and background research have indicated that there would be no impact on Aboriginal objects

9.2 Recommendations

Based on the findings of this assessment, and in accordance with Aboriginal heritage guidelines in the industry specific SEARs for data centres, the following Aboriginal heritage mitigation measures recommended for the project are made:

Table 7: Recommended Aboriginal mitigation measures

Ref.	Description
AH1	All relevant construction staff, contractors and subcontractors must be made aware of their statutory obligations for heritage under the NPW Act and the SSD Conditions of Approval to ensure no archaeological objects are impacted during the proposed works without appropriate mitigation measures in place. This is to be implemented through a heritage induction carried out prior to works commencing and continued throughout the works program as staff are inducted to the site. This would include details on the location of nearby Aboriginal sites and the Unexpected Finds Procedure.
AH2	As Mars Rd PAD1 will not be impacted by the proposed development, no further archaeological investigation is proposed. The project would be managed under an Unexpected Finds Procedure that must be developed and implemented for the project and would be documented in the Construction Environmental Management Plan. Further archaeological investigation and consultation with registered Aboriginal parties must be undertaken should designs change and works are proposed within the identified extent of Mars Rd PAD1.
AH3	The site extent of Mars Rd PAD1 should be shown on the proponent's Environmental Control Maps for the knowledge of all workers during the course of works.

Ref.	Description
AH4	Management of Aboriginal cultural heritage values must be carried out in compliance with the Aboriginal cultural heritage consultation requirements for proponents 2010 (Consultation Requirements) (Department of Environment, Climate Change and Water (DECCW 2010b). Consultation with Aboriginal stakeholders in relation to Aboriginal heritage management must continue through the project where necessary, including involvement in the management of Aboriginal objects and the discovery of any Aboriginal unexpected finds.

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APPENDIX A – TECHNICAL REPORT (Redacted from public view)

APPENDIX B – CONSULTATION RECORDS (Redacted from public view)



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