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17 March 2026

Department of Planning, Housing and Infrastructure
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To whom it may concern,

SSD-82211208– 78 LOCKWOOD ROAD, ERSKINEPARK – ADDENDUM TO ABORIGINAL CULTURAL HERITAGE ASSESSMENT

We refer to the State Significant Development Application (SSD-82211208) for the proposed redevelopment of 78 Lockwood Road, Erskine Park, NSW, legally described as Lot 101 in Deposited Plan 1268632 (**the subject area**) (Figure 1).

The present communication has been prepared as a supplementary report to accompany the Aboriginal Cultural Heritage Assessment (**the ACHA**) prepared by Urbis and dated 7 August 2025, which was previously submitted in support of SSD-82211208. The purpose of the addendum is to address the external HV cable connection route which will be required as part of the greater Data Centre works. The HV route follows the existing road corridor from the SSDA site via Lenore Drive and connects to the Sydney West TransGrid substation. This report should be read in conjunction with the preliminary ACHA.

ACHA SUMMARY

The ACHA was undertaken to investigate whether the proposed development of the subject area is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject area and to formulate measures for avoiding or minimising any such impacts.

The ACHA concluded that:

- The subject area is within a broader Aboriginal landscape with nearby sites registered on the AHIMS register which overlap the current subject area. The subject area was the subject of previous test excavations which identified the presence of Aboriginal objects (Navin Officer, 2007). These were assessed to be of low archaeological significance within a local context only. No further archaeological assessment was recommended for the study area and an application for a Section 90 Consent to Destroy was recommended. Subsequent bulk earthworks have been conducted under the approval of DA19/0818. No intact natural soils are expected to remain within the subject area.
- Portions of the subject area are located within 200m of Ropes Creek. This landscape feature is considered indicative of past Aboriginal land use under the Due Diligence Code.

- The subject area has been heavily modified in preparation for industrial development. The Ropes Creek Employment Area, which encompasses the present subject area, was the subject of previous test excavations following which an application for a Section 90 Consent to Destroy was recommended. Subsequent bulk earthworks have been conducted under the approval of DA19/0818. Ground disturbance is therefore assessed as high. No intact natural soils are expected to remain within the subject area.
- In view of the high ground disturbance across the entire subject area, the Aboriginal archaeological potential of the entire subject area is Very Low.
- The subject area is assessed as having low Aboriginal cultural heritage significance.
- Due to high levels of disturbance conducted under the approval of DA19/0818, it is assessed that potential archaeological deposits within the subject area will have already been significantly impacted, if not removed entirely. Future works are unlikely to cause further cumulative impacts to Aboriginal cultural heritage values.

Based on the above conclusions, Urbis made the following recommendations in the ACHA:

- A copy of the ACHA should be submitted with the Environmental Impact Statement (EIS) in support of SSD-82211208
- As the proposed works are unlikely to harm any Aboriginal objects or declared Aboriginal places, it is recommended that no further investigation is required for the present development.
- The unexpected archaeological finds and human remains procedures outlined in the ACHA should be followed in the unlikely event that any archaeological materials or human remains, or suspected archaeological materials or human remains, are uncovered during any works within the subject area.

The above recommendations were endorsed by five of the Registered Aboriginal Parties.



GDA 1994 MGA Zone 56

50 M

Project No: P0056868

Project Manager: Ali Byrne

Subject Area Contours Hydrology Permanent Ephemeral

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LOCATION OF THE SUBJECT AREA
78 Lockwood Road
Stack Infrastructure

Figure 1 – Subject area

UPDATED PROPOSED WORKS

The amended project includes the installation of two HV cables to connect the site with the TransGrid Sydney West Substation on Old Wallgrove Road, via road reserve within Lenore Drive, with point of entry to Sydney West Substation location on Lenore Drive. The construction impact footprint is outlined in red in Figure 2, below. Total route length is approximately 2.1km. The cable route extends across two LGAs, Penrith City Council and Blacktown City Council, TfNSW State Road reserve and private properties.

Key components of the project include:

- 1) Cable works connecting TransGrid Sydney West Substation with the STACK SYD01 onsite substation comprising:
 - Two x 330kV underground transmission cable circuits comprising six cables installed within six conduits
 - Two smaller conduits for carrying optical fibres
 - Approx. 2-4 joint bays, per circuit, where sections of cable would be joined together, located approximately every 600-800 meters along the transmission cable route
 - Link boxes and sensor boxes associated with each joint bay to allow cable testing and maintenance
- 2) STACK SYD01 Customer Substation
 - Two x GIS buildings approximately 75x50m
 - Three x 250 MVA Transformers and Eights x 90 MVA transformers
 - Auxiliary electrical equipment

Associated works required to facilitate the construction of the project, such as potential utility relocations have been considered. No major utility relocations are anticipated and where smaller services may need to be moved to accommodate the transmission cable circuit, this relocation would be restricted to within the project areas assessed in the EIS.

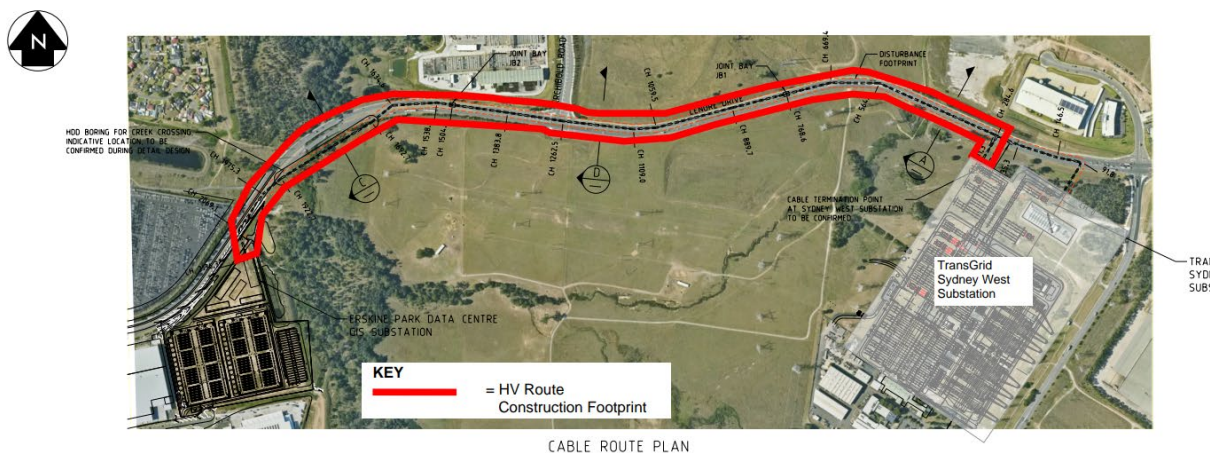


Figure 2 – HV connection route.

ARCHAEOLOGICAL CONTEXT

To determine if an Aboriginal cultural heritage will be impacted by the proposed works within the connection route, the archaeological context of the connection route was assessed using the same methodology as the ACHA. The assessment considers harm that may be caused to both known Aboriginal objects and as yet unknown Aboriginal objects within the subject area.

Known Aboriginal Sites

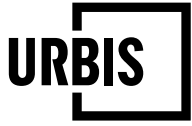
An updated search of the Aboriginal Heritage Information Management System (AHIMS) was carried out on 5 March 2026 (AHIMS Client Service ID: 1098814 and 1098817) for an area of approximately 3.5 km x 3 km. The search area was the same as that undertaken for the ACHA with an additional area to the east to include the entirety of the HV cable route. The Basic and Extensive AHIMS search results are included in Attachment A. Registered Aboriginal sites in proximity to the proposed works are shown in Figure 3.

The search identified three Aboriginal sites within the location of the HV connection route works. Two at the eastern extent on Lenore Drive, being AHIMS ID# 45-5-3842 EPLR1 and AHIMS ID# 45-5-3843 RCIF1, and one on the western extent, being AHIMS ID# 45-5-3062 EP PAD1. The site extents are shown in Figure 4 and their details summarised in Table 1.

AHIMS ID# 45-5-3842 EPLR1 and AHIMS ID# 45-5-3843 RCIF were first identified by Navin Officer for the Western Sydney Employment Hub Erskine Park Link Roads Network Aboriginal Heritage Review Report to NECS for the NSW RTA. They were identified during extensive field survey conducted for the proposed construction of what is now named Lenore Drive. These sites were the subject of archaeological excavations conducted by Biosis in 2010 under Aboriginal Heritage Impact Permit (AHIP) 1113179 (AHIMS permit ID 3262). Excavations revealed low density lithic scatters in a disturbed context. Disturbance included truncated soil profiles and was attributed to agricultural uses, vehicle movement and disturbance related to the construction and maintenance of overhead power lines. The sites were assessed as being of low scientific significance due to the small number of artefacts and disturbed nature. Following excavations an application for a Section 90 Consent to Destroy was recommended.

A further AHIMS registered site was included in AHIP 1113179 being AHIMS ID# 45-5-3062 EP PAD1. This is the site recorded as Artefact, PAD immediately to the east of the current subject area (Figure 3), however its boundaries were later enlarged to include areas to the north and south, and including a portion of the subject area. This is discussed in greater detail in the ACHA in Section 3.15. No report was available at the time of writing, and all information is derived from a Site Impact Recording Form attached to the site card. The portion of this site within the proposed construction footprint was the subject of archaeological excavations conducted by Biosis in 2010 and included the portion of Lenore Drive immediately to the north-east of the subject area (Figure 4). Excavations revealed a medium density lithic scatter in a disturbed context. Disturbance was attributed to farm activities including grazing and possibly ploughing, vegetation clearance, revegetation and construction of fences. Construction of the HV transmission easement and towers, and vehicle tracks will have caused further disturbance. It was assessed that no further scientific information could be gained from the site, and an application for a Section 90 Consent to Destroy was recommended.

AHIMS records the status of sites in the register. Sites that have been cleared for development under an AHIP or a Section 90 Consent to Destroy require updating by the proponent involved in the development proposal. Table 1 shows the current status of the sites mentioned above. Only AHIMS ID# 45-5-3062 is registered as 'Partially destroyed'. This designation is likely due to the size of the site



which was only partially impacted by the construction of Lenore Drive. AHIMS ID# 45-5-3842 and AHIMS ID# 45-5-3843 are recorded as remaining 'Valid' indicating these sites have not been impacted. This designation is likely to be due to clerical oversight as they have clearly been impacted by the construction of Lenore Drive. The current proposal, which is confined to the current road alignment, is unlikely to further impact the afore mentioned AHIMS sites.

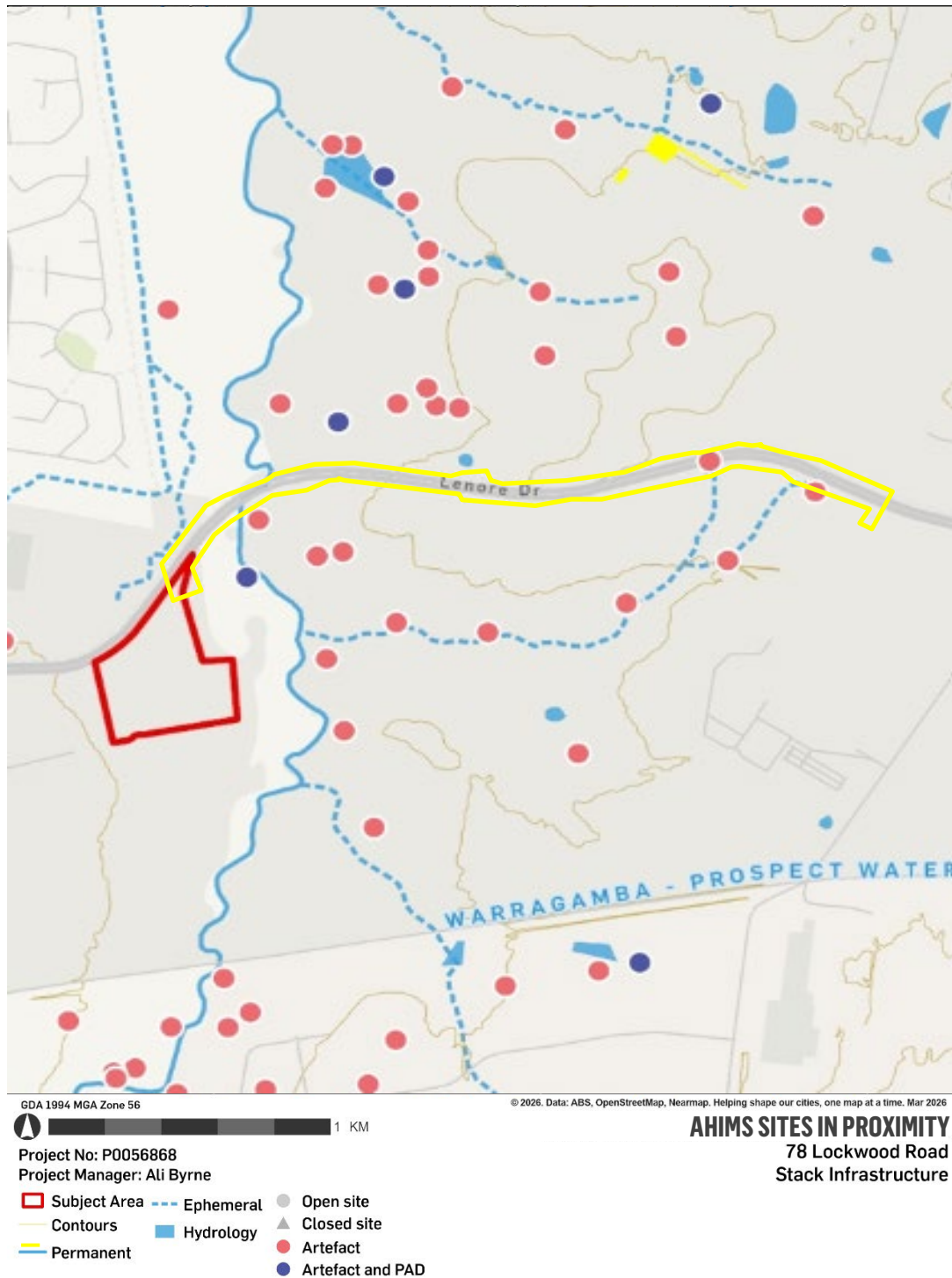


Figure 3 – Registered Aboriginal sites in proximity; proposed HV route marked in yellow

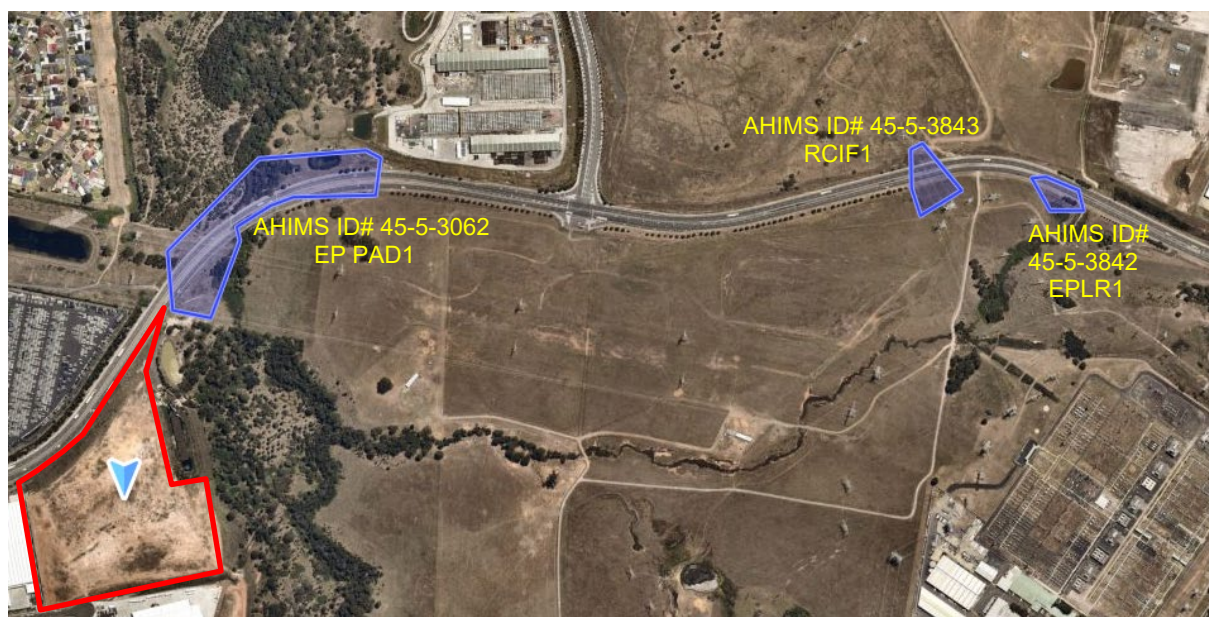


Figure 4 – Areas of archaeological excavation (blue outline); subject area marked red
Source: Nearmap 2025

Table 1 – Aboriginal sites within HV connection route

AHIMS ID	AHIP #	Previous investigations	Current Registered Status
45-5-3062	1113179	Test excavation; Permission to destroy recommended	Partially Destroyed
45-5-3842	1113179	Test excavation; Permission to destroy recommended	Valid
45-5-3843	1113179	Test excavation; Permission to destroy recommended	Valid

Archaeological Potential

The potential for previously unknown Aboriginal objects to occur within the location of the HV connection route works is assessed using the predictive model employed in the ACHA.

The predictive model considers both the likelihood that Aboriginal people once frequented an area based on known associations of Aboriginal sites with certain landscape features and the ground disturbing processes, both natural and artificial, that may either aid or hinder the preservation of Aboriginal objects.

- **Sensitive Landscape Features:** The eastern and western portions of the proposed area of construction impact are within 200 m of a natural waterways (Figure 3). The association of these areas with water is considered indicative of past Aboriginal land use under the predictive model employed for the ACHA. The intermediate connection route is not associated with any other sensitive landscape features defined in the ACHA.

- **Ground Disturbance:** The NSW Soil and Land Information System (SALIS) indicates that the entire connection route, like the original subject area, is located within the South Creek soil landscape. Low terrace soils are described as 2–50 cm sandy clay loam A horizon overlying clay loam and medium to heavy clay. Shallow soils are particularly susceptible to disturbance. Construction of the HV transmission easements and towers, Sydney West Substation and Lenore Drive will have disturbed most, if not all, of the shallow A-horizon soils. Historical ground disturbance along the proposed HV connection route is thus assessed to be high.

All portions of the connection route are within an area subject to a high level of historical ground disturbance including agricultural uses, construction of HV transmission easements and towers, Sydney West Substation and Lenore Drive. Applying the predictive model outlined in the ACHA, Aboriginal archaeological potential across the entire connection route is assessed to be **very low**.

POTENTIAL HARM

The desktop assessment identified that the location of the HV connection works has been the subject of previous archaeological assessments including survey and excavation. Prior to the construction of Lenore Drive, areas of archaeological potential were assessed as low significance and a Section 90 Consent to Destroy was recommended. It is further determined that it is unlikely that any as yet unknown Aboriginal objects are retained anywhere within the subject area or the location of the HV connection route works, due to high levels of historical ground disturbance.

Therefore, any physical works within the subject area or within the proposed HV connection route, including the updated proposed works described in this communication, are unlikely to cause any harm to Aboriginal objects.

CONCLUSION & RECOMMENDATIONS

Registered Aboriginal sites within the subject area or within the location of the HV connection route works have been the subject of previous archaeological excavation prior to construction of Lenore Drive. The entirety of the proposed HV connection route has very low archaeological potential due to high levels of historical ground disturbance.

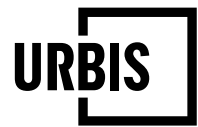
These findings are consistent with the findings of the ACHA for the original subject area. The recommendations of the ACHA therefore remain valid for the updated proposed works, both within the original subject area and within the proposed HV connection route works.

A copy of this addendum was provided to all RAPs on 24 March 2021 to ensure that they are kept informed about SSD-82211208 and to provide them with the opportunity to provide feedback.

Yours faithfully,

A handwritten signature in black ink, appearing to read "O Barrett".

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ATTACHMENT A: AHIMS SEARCH RESULTS

