



artefact

11 July 2025

Fatemah Taghvaei  
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Dear Fatemah,

**Re: Aboriginal Heritage Impact Assessment Report – 15a-15b Moseley Street & 25-31 Donald Street, Carlingford**

Artefact Heritage and Environment Pty Ltd (Artefact Heritage) have been engaged by Capiro Property Group to prepare an Aboriginal Heritage Impact Assessment Report for the proposed development at 15a-15b Moseley Street and 25-31 Donald Street, Carlingford.

This report outlines the results of an Aboriginal Heritage Impact Assessment (AHIA) which adheres to the principles of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water [DECCW] 2010a), hereafter the Due Diligence Code of Practice. This report includes recommendations as to whether an Aboriginal Cultural Heritage Assessment (ACHAR) is required.

This report has been prepared by Amanda Bie Wojcik (Graduate Heritage Consultant, Artefact Heritage) with management input and review provided by Ryan Taddeucci (Principal, Artefact Heritage) and Josh Symons (Technical Executive, Artefact Heritage).

If you have any queries regarding this AHIA, please do not hesitate to contact me.

Yours Sincerely,

Amanda Bie Wojcik  
Graduate Heritage Consultant  
Artefact Heritage  
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## 1.0 PROJECT INFORMATION

### 1.1 Project background

Capio Property Group intends to undertake development at 15a-15b Moseley Street and 25-31 Donald Street, Carlingford which will be an infill affordable housing SSD as per Schedule 1 Section 26A of the SEPP (Planning Systems) 2021.

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) and accompanying cover letter issued for the in-fill affordable housing development at Moseley Street and Donald Street, Carlingford (SSD-83870463) dated 12 May 2025. The Planning Secretary's Environmental Planning and Assessment Requirements (SEARs) have been issued for the project and include the following provisions for Aboriginal Heritage:

SEAR	Supporting Documentation
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#### 21. Aboriginal Cultural Heritage

- Where there is known, or reasonably likely, to be Aboriginal cultural heritage on or near the site demonstrate that impacts have been adequately investigated and assessed by:
    - Identifying that an appropriate prior planning process has already considered these impacts, e.g. a rezoning or development application, or
    - Providing an initial assessment of the potential impacts.
  - If potential impacts are significant, provide an Aboriginal Cultural Heritage Assessment Report (ACHAR) which:
    - Identifies, describes and assesses any impacts to Aboriginal cultural heritage sites or values associated with the site.
    - Is prepared in accordance with relevant guidelines.
- If required:
- Aboriginal Cultural Heritage Assessment Report

This report adheres to the standards for initial assessment of potential impacts to Aboriginal heritage set out in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water [DECCW] 2010; Henceforth the Due Diligence Code of Practice).

Undertaking Due Diligence involves reasonable and practical steps to:

1. Identify whether or not Aboriginal objects are, or are likely to be, present in an area
2. Determine whether or not their activities are likely to harm Aboriginal objects (if present)
3. Determine whether further assessment is required

### 1.2 Description of the study area

The study area is located at 15a-15b Moseley Street & 25-31 Donald Street, Carlingford, and currently comprises of newly empty lots consolidated into an area of approximately 5948m<sup>2</sup>. It is located within the City of Parramatta Local Government Area (LGA) and the Deerubbin Local Aboriginal Land Council (LALC). The legal description of the site is outlined in Table 1.

**Table 1: Legal description of study area**

Property Address	Title Description
15a & 15b Moseley Street and 25-31 Donald Street, Carlingford, NSW	<ul style="list-style-type: none"><li>• Lot 2 DP35555</li><li>• Lots 32, 33, 34, 35 DP 536982</li><li>• Lot 5 DP 35555</li></ul>

### 1.3 Proposed works

The application seeks development consent for the development of an in-fill affordable housing development at 15A-15B Moseley Street and 25-31 Donald Street, Carlingford. Specifically, the SSDA seeks development consent for:

- Demolition of all existing buildings and structures.
- Staged construction of two residential flat buildings and a childcare centre, with a maximum building height of up to 31.7 metres, including:
  - Stage 1 – Buildings A1 and A2 including a total of 60 apartments.
  - Stage 2 – Building B including a 76-place childcare centre and 76 apartments.
- A total of approx. 136 residential apartments, including:
  - 106 market apartments
  - 30 affordable housing apartments to be managed by a CHP for 15 years (equivalent to at least 15% affordable housing based on the total proportion of all floor space)
- A total gross floor area (**GFA**) of approximately 14,044 m<sup>2</sup> (equating to an FSR of approx. 2.36:1), including:
  - A childcare centre comprising approx. 413 m<sup>2</sup> GFA
  - Total residential GFA of approx. 13,631 m<sup>2</sup>
- Excavation for approx. 2-3 shared basement levels providing 186 car parking spaces, comprising:
  - 164 residential parking spaces
  - 22 visitor spaces (including one car wash space)
  - 21 accessible car parking spaces
  - Motorcycle and bicycle parking spaces
- Vehicular access from Donald Street for the residential apartments, and access from Moseley Street for the childcare centre (including 23 car parking spaces for the childcare centre).
- Associated civil works (including earthworks and stormwater management works), landscaping, and the extension and augmentation of physical infrastructure and utilities as required.

## 1.4 Statutory framework

The *National Parks & Wildlife Act 1974* (the NPW Act) provides statutory protection for all 'Aboriginal objects' and 'Aboriginal Places' in NSW whereby it is an offence to damage, deface or destroy Aboriginal objects or places. The NPW Act defines an Aboriginal 'object' as:

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

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An 'Aboriginal place' is a place gazetted by the Minister, under the Section 84 of the NPW Act:

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*The Minister may, by order published in the Gazette, declare any place specified or described in the order, being a place that, in the opinion of the Minister, is or was of special significance with respect to Aboriginal culture, to be an Aboriginal place for the purposes of this Act.*

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Figure 1: Study Area



## 2.0 BACKGROUND

### 2.1 Aboriginal Heritage Information Management System (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 the heritage map for the proposal be removed from this report if it is to enter the public domain.**

A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client ID 989871) was completed on 28 March 2025 for a search area measuring approximately 2500m surrounding the study area (Figure 2). The parameters of this search were:

GDA 1994 MGA 56	-33.784679 – -33.770552 Lat
	151.04131 – 151.058663 Long
Buffer	0 m
Number of sites	0
Client Service ID	989871

No registered Aboriginal sites were identified within the study area or within 2500m of the study area.

The study area and surrounds have been heavily disturbed by residential and commercial development. That, combined with a possible lack of archaeological investigations in the local area, are some of the reasons why no Aboriginal sites have been recorded in the vicinity.

The limited number of archaeological investigations that have taken place in the Carlingford area have concluded that the likelihood of Aboriginal objects and/or places existing within and within 2500m of the study area is nil-low. Those will be discussed in Section 2.2.

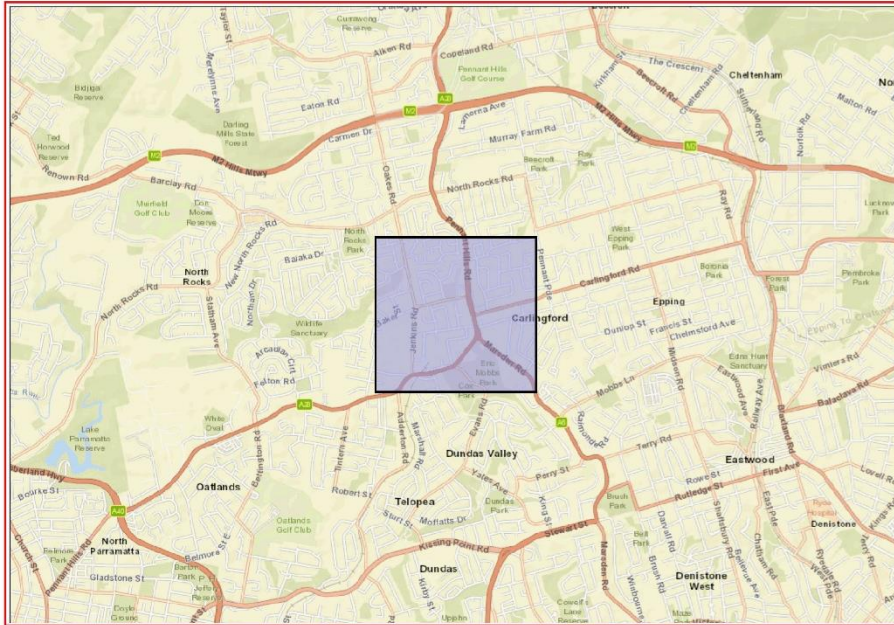
The area's landscape is also a factor which does not indicate that any Aboriginal objects and/or places would be present (Figure 3 and Figure 4). Archaeological evidence of Aboriginal land use can be concentrated in other places such as around water courses.

There have not been enough focus/investigations on the Carlingford area for more precise results; however, based on this desktop assessment and the visual inspection of the area, it is unlikely that any potential Aboriginal objects and/or places will be impacted by the proposed works.

Figure 2: AHIMS Basic Search results (AHIMS Web Services (AWS), 28 March 2025)

AHIMS Web Service search for the following area at Lat, Long From : -33.784679, 151.04131 - Lat, Long To : -33.770552, 151.058663, conducted by Amanda Bie Wojcik on 28 March 2025.

The context area of your search is shown in the map below. Please note that the map does not accurately display the exact boundaries of the search as defined in the paragraph above. The map is to be used for general reference purposes only.



A search of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

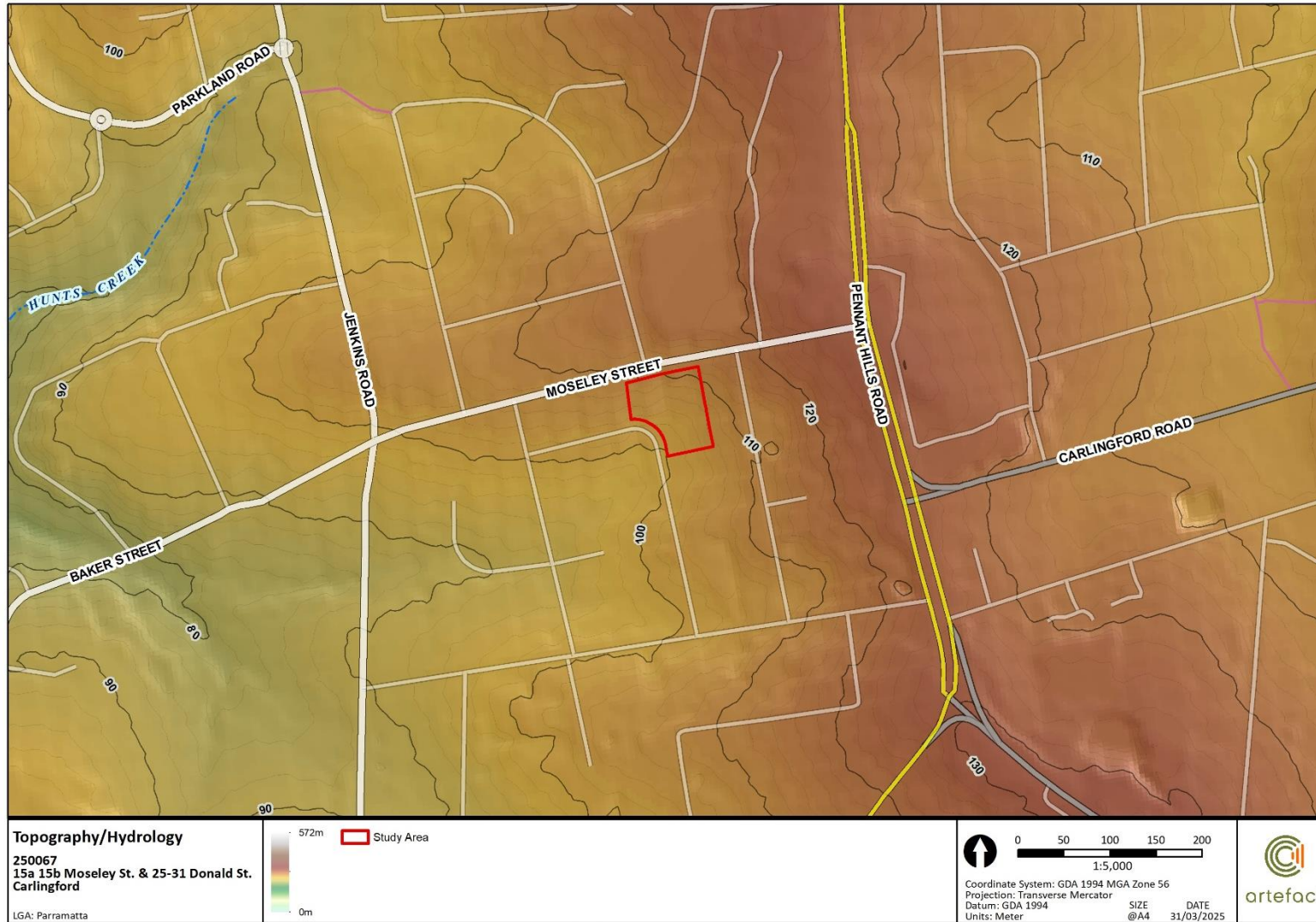
<b>0</b> Aboriginal sites are recorded in or near the above location.
<b>0</b> Aboriginal places have been declared in or near the above location. *

Figure 3: Study area soil landscape



Document Path: C:\Users\MDouglas\OneDrive - Artefact Heritage Services Pty Ltd\GIS\GIS\_Mapping\250067\_MoseleyAndDonald\_Carlingford\MXD\250067\_Soil.Landscape\_v1\_310325.mxd

Figure 4: Study area hydrology and topography



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## 2.2 Previous Assessments, Approvals and Permits

Two previous assessments have been conducted within a 1km radius of the study area:

### **Narla Environmental, 2020, Carlingford Road and Hepburn Avenue Traffic Signals Upgrade. Report to City of Parramatta.**

Narla Environmental were engaged by City of Parramatta to prepare an environmental impact assessment for the traffic signals update on Carlingford Road and Hepburn Avenue, approximately 800m east of the study area. Their report conducted an AHIMS search with a 200m buffer and concluded that there were no Aboriginal sites and/or objects present within and within 200m of their proposal area.

### **Transport for NSW, Pennant Hills Road and North Rocks Road, Carlingford – Intersection Upgrade Addendum review of environmental factors.**

Transport for NSW had approved a proposal to upgrade the intersection at Pennant Hills Road and North Rocks Road in Carlingford, approximately 850m north of the study area. Although that report was not an archaeological assessment, they also conducted an AHIMS search with a 50m buffer. They concluded that:

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- *The project is unlikely to harm known Aboriginal objects or places.*
  - *The AHIMS search did not indicate any known Aboriginal objects or places in the immediate proposal area.*
  - *The area does contain landscape features that indicate the presence of Aboriginal objects, based on the Office of Environment and Heritage's Due diligence Code of Practice for the Protection of Aboriginal objects in NSW and the Transport for NSW's procedure, however, the cultural heritage potential of the study area appears to be reduced due to past disturbance in the form of construction of Pennant Hills Road, North Rocks Road, and surrounding residential development.*
  - *The cultural heritage potential of the proposal area appears to be reduced due to past disturbance in the form of construction of Pennant Hills Road, North Rocks Road and surrounding residential development.*
  - *There is an absence of sandstone rock outcrops likely to contain Aboriginal art*
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No formal archaeological investigations or approvals/permits have been identified as undertaken within the study area/in close proximity to the study area.

## 2.3 Historical land disturbance

The study area is located in the parish of Field of Mars, county of Cumberland, within the 50-acre land granted to James Larra, in 1797 (Figure 5). Naming it 'Hannah Farm', Larra dedicated himself to farming his grant until 1798, when he decided to venture into liquor trading (Figure 6) (Bergman, 1967). The study area was likely fully cleared during this short period (1797-1798) and this activity would have reduced the likelihood of potential Aboriginal artefacts to be present. Early colonial activity would have removed/destroyed potential Aboriginal objects and/or places within the study area.

Aerial imagery reveals that the study area remained cleared, unused land well into the interwar period (Figure 7). Subdivision intensified, and during the 1950s, there were houses already built by Donald Street (Figure 8). Those houses remained within the same footprint and outline well until the 1970s (Figure 9 & Figure 10). They were demolished in the late 1970s/early 1980s, and new subdivision occurred, with more houses along Moseley and Donald were constructed (Figure 11 & Figure 12). These were also demolished in late 2024 and the site is currently a large empty lot owned by Capio.

**Figure 5: 1894 Parish of Field of Mars with study area outlined, belonging to James Larra (Source Historical Land Records viewer).**

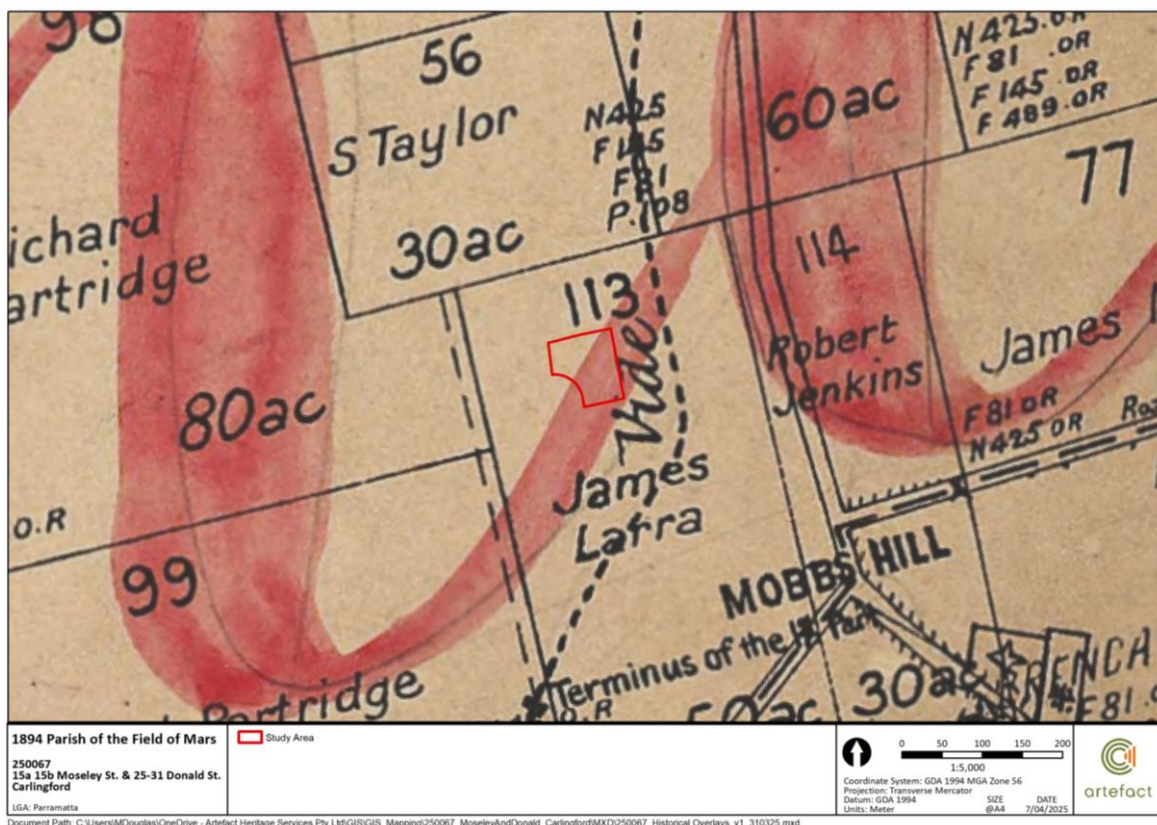


Figure 6: 1910 Parish of Field of Mars with the study area outlined within James Larra's farm - 'Hannah Farm' (Source: Historical Land Records Viewer).

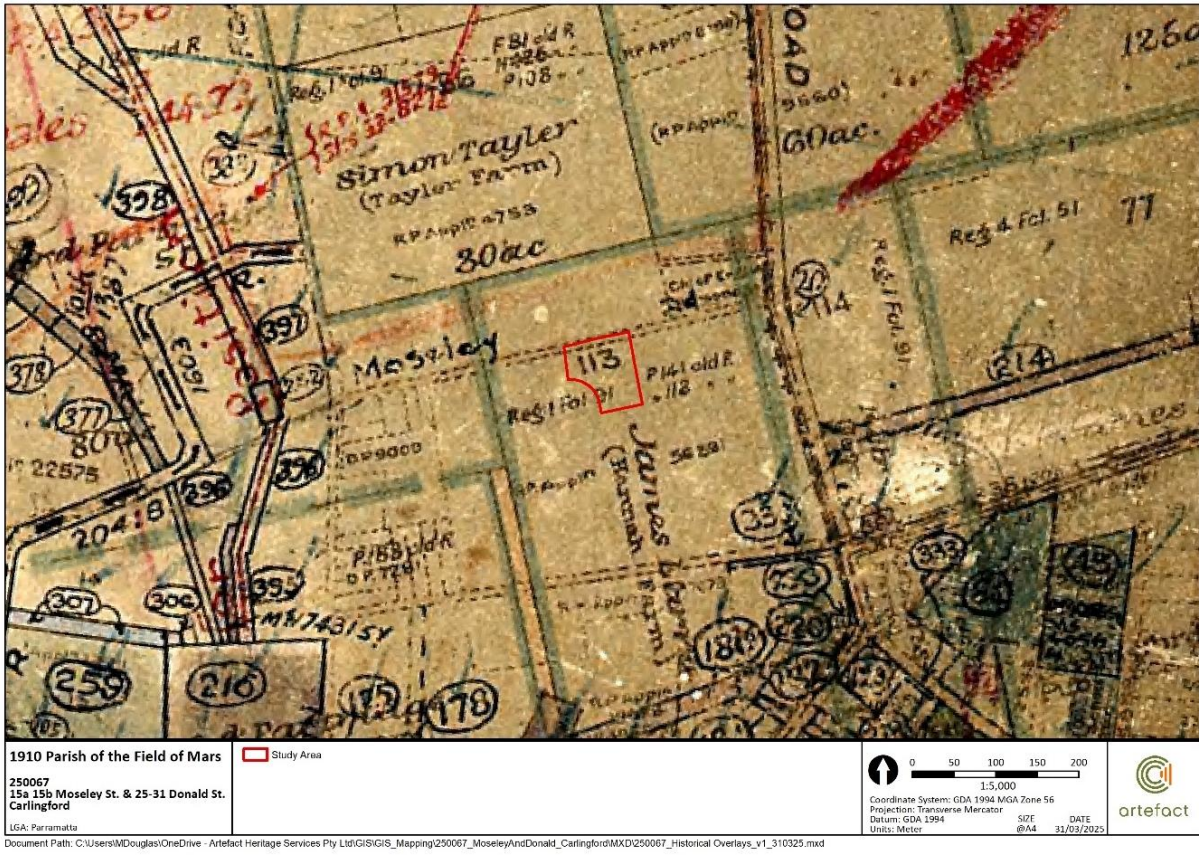


Figure 7: 1943 aerial of study area, cleared land (Source: Spatial Collaboration Portal).

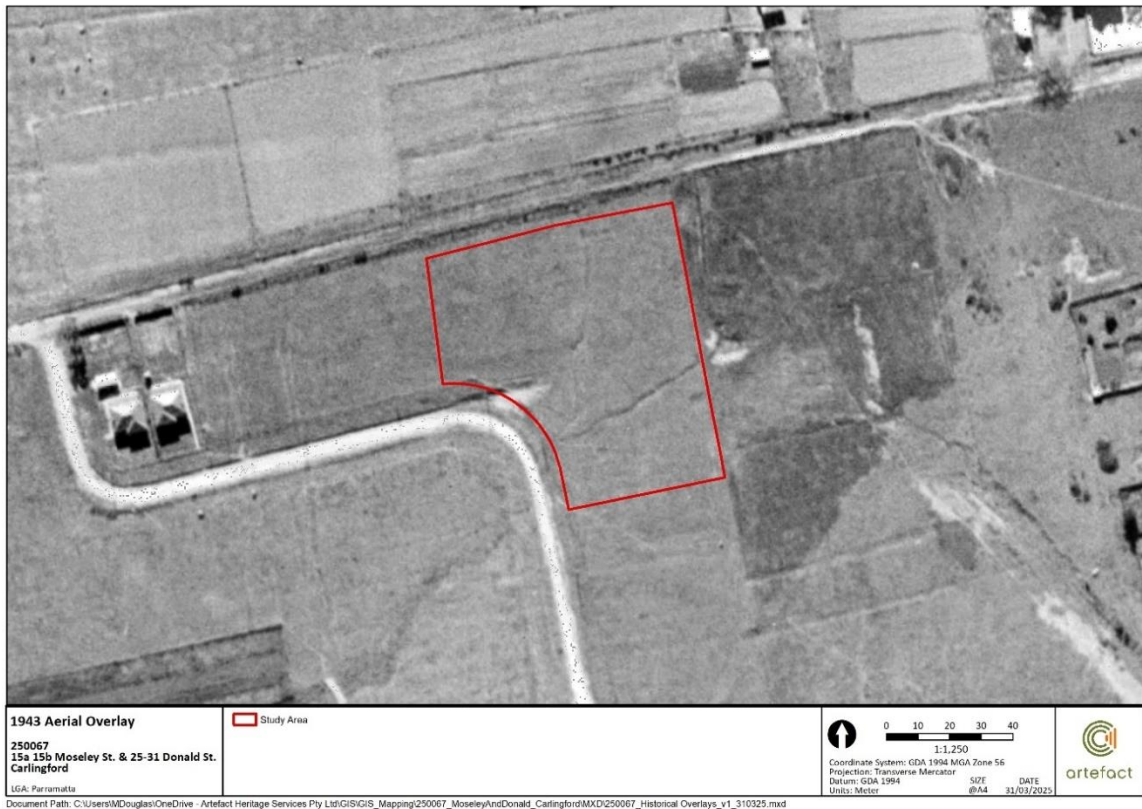


Figure 8: 1955 aerial of study area, initial houses by Donald Street (Source: Spatial Collaboration Portal).



Figure 9: 1965 aerial of study area, houses more developed but within same footprint (Source: Spatial Collaboration Portal).



Figure 10: 1970 aerial of study area, same as above (Source: Spatial Collaboration Portal).



Figure 11: 1986 aerial, new subdivision and houses within study area (Source: Spatial Collaboration Portal).



Figure 12: 1994 aerial, new houses within study area, prior to demolition (Source: Spatial Collaboration Portal).



### 3.0 VISUAL INSPECTION

A visual inspection of the study area was undertaken by Amanda Bie Wojcik (Graduate Heritage Consultant) and Kieran Murray (Heritage Consultant), both from Artefact Heritage on 3 April 2025. Conditions were clear skies with light wind and were deemed appropriate for the visual inspection to take place.

The study area's natural landform slopes down towards the south (Figure 15). The study area was overgrown post demolition, with weeds and demolition debris scattered throughout (Figure 13 to Figure 20 and Figure 22 to Figure 30).

Evidence of previous earthworks across the site was observed, including cut and fill activities which are likely to have disturbed natural soil profiles on the site and impacted any Aboriginal objects and/or sites that may have been present previously. Some of the footings and other remains of former houses at Moseley Street were visible during the site inspection (Figure 29).

Observations of the limited surface exposures within the study area demonstrated imported soil, sand and gravel fill, and demolition debris (Figure 15 & Figure 20 & Figure 22 & Figure 27). Mixed natural soils which were also observed, further indicating extensive ground disturbance and disruption to the natural soil profile. No sandstone outcrops were observed during the visual inspection of the study area.

Occasional trees were observed around the study area, and they were checked for cultural markings. However, as observed through aerial imagery and by visually inspecting them, it was concluded that they are relatively recent growth and are unlikely to represent culturally scarred trees (Figure 21, Figure 25 & Figure 26).

No Aboriginal objects were identified in the study area. Due to high disturbance levels observed across the study area, no areas of archaeological potential were identified.

**Figure 13: Context shot of study area facing northeast, sloping south.**



**Figure 14: Study area facing southeast towards brick structure.**



**Figure 15: Exposure of sand and gravel showing slope of study area.**



**Figure 16: Exposure of sand and gravel facing south of study area.**



**Figure 17: Overgrown weeds facing southeast, brick structure in the background.**



**Figure 18: Overgrown weeds by gate facing northeast.**



Figure 19: North corner of study area facing north.



Figure 20: Exposure of imported fill with gravel and demolition debris.



Figure 21: Inspected tree on eastern boundary of study area.



Figure 22: Exposure of imported sand, gravel and demolition debris south of study area.



Figure 23: Study area facing north from southern boundary.



Figure 24: Study area from southeast corner facing west.



**Figure 25: Tallest tree observed in the study area, along the western boundary.**



**Figure 26: Tallest tree in the study area, with scale, facing south.**



**Figure 27: Exposure of gravel, likely demolition debris.**



**Figure 28: Exposures of imported fill and gravel on southwest corner by gate.**



**Figure 29: Remains of previous structures where 15a and 15b Moseley Street were.**



**Figure 30: Low ground visibility due to overgrown weeds facing west.**



## 4.0 ABORIGINAL POTENTIAL OF THE STUDY AREA

Archaeological potential is closely related to levels of ground disturbance. However, other factors are also taken into account when assessing archaeological potential, such as whether the area is within a landscape feature that is likely to indicate the presence of Aboriginal objects.

### 4.1 Landscape features that are likely to indicate the presence of Aboriginal objects

Particular landscape features in NSW are known to have been favoured locations for repeated or long-term occupation and, hence, more likely to retain archaeological evidence of past Aboriginal use. The Due Diligence Code of Practice identifies five landscape features that indicate the likely existence of Aboriginal objects, these include:

- *Within 200m of water, or*
- *Located within a sand dune system, or*
- *Located on a ridge top, ridge line, or headland, or*
- *Located within 200m below of a cliff face, or*
- *Within 20m of or in a cave, rock shelter, or cave mouth (Environment 2010)*

The study area is not located in proximity of any of the landscape features specified in the Due Diligence Code of Practice as indicating the likely existence of Aboriginal objects.

Landscape Feature	Presence in study area
Within 200m of water	<b>No.</b> The study area is not within 200m of water.
Located within a sand dune system	<b>No.</b> The study area is not located within a sand dune system
Located on a ridge top, ridge line, or headland	<b>No.</b> The study area is not located on a ridge top, ridge line, or headland
Located within 200m below of a cliff face	<b>No.</b> The study area is not located within 200m below of a cliff face
Within 20m of or in a cave, rock shelter, or cave mouth (Environment 2010)	<b>No.</b> The study area is not within 20m of or in a cave, rock shelter, or cave mouth

## 4.2 Ground disturbance

Archaeological potential is closely related to levels of ground disturbance. However, other factors are also taken into account when assessing archaeological potential, such as whether artefacts were located on the surface, and whether the area is within a landscape feature that is likely to indicate the presence of Aboriginal objects. The Due Diligence Code of Practice defines disturbed land:

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*Sec 7.5 (4) For the purposes of this clause, land is disturbed if it has been the subject of human activity that has changed the lands surface, being changes that remain clear and observable.*

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Background research indicates extensive historical land disturbance in the form of deforestation, land clearing and the modern construction of residential structures and pathways. Historical aerial imagery demonstrates that residential development within the study area began as early as the 1950s. The installation of subsurface services within the study area have likely involved ground disturbing excavations.

The visual inspection confirmed the study area had been subject to ground disturbance. Soil exposures observed during the inspection demonstrated a large variety of soils and fills, indicating soil import and relocation of original soils. It is likely that the combined impact of land clearing, building construction and soil import has resulted in the removal of Aboriginal objects which may have previously been in the study area. No Aboriginal objects were observed during the visual inspection, and no archaeological potential was identified.

## 5.0 THE DUE DILIGENCE PROCESS

The Due Diligence Code of Practice provides a series of questions that must be answered to determine the outcome of the due diligence process. These questions are addressed in Table 2.

**Table 2: Due Diligence questions and responses**

Question	Answer	Comment
Will the activity disturb the ground surface or any culturally modified trees	Y	The proposed works will significantly disturb the ground surface via deep excavation for the construction of the underground carparks.  No culturally modified trees are present within the study area.
Are there any: <ul style="list-style-type: none"> <li>Confirmed AHIMS records</li> <li>Other sources of information</li> <li>Landscape features</li> </ul>	N	No AHIMS sites are within or near the study area, no located sources of information suggest the presence of Aboriginal objects within the study area and no landscape features indicate the likely presence of Aboriginal objects within the study area.
Can harm to Aboriginal objects be avoided	Y	No Aboriginal objects were identified during visual inspection of the study area. Aboriginal objects are unlikely to be present in the study area.
Does a desktop assessment and visual inspection confirm the presence of Aboriginal objects, or that they are likely to be there	N	The desktop assessment and visual assessment and visual inspection indicated the study area had been subject to significant levels of disturbance. It is considered unlikely that Aboriginal objects are present within the study area.
Is further assessment required	N	Works may proceed with caution. Aboriginal objects encountered as unexpected finds remain protected under the National Parks and Wildlife Act 1974. Where Aboriginal objects are encountered, an archaeological assessment will be required.

## 6.0 CONCLUSION

The following conclusions and recommendations regarding Aboriginal heritage are based on consideration of:

- The *Planning Secretaries Environmental Assessment Requirements: Housing* 21. Aboriginal Cultural Heritage
- DECCW Due Diligence Code of Practice
- The results of the AHIMS search, background research and visual inspection
- The likely impacts of the proposed development

It was found that:

- There is extensive historical ground disturbance within the study area
- There are no landforms indicating the likely presence of Aboriginal objects within the study area
- No Aboriginal objects and no areas of archaeological potential were identified within the study area

The following recommendations are therefore made:

- As no Aboriginal objects or places will be harmed as result of the proposed works, preparation of an ACHAR to support the SSD application is not recommended.
- The findings of this AHIA should be summarised in the Environmental Impact Statement (EIS) to support the SSD application.
- It is advised that this AHIA does not constitute consent to harm Aboriginal objects, nor it is a 'site clearance' mechanism to allow activities to occur in an area where Aboriginal objects are likely or known to be present.
- If Aboriginal objects are discovered during the proposed works, works must stop immediately, and an assessment must be undertaken in accordance with Part 6 of the National Parks and Wildlife Act 1974. It is recommended that a stop-work procedure be developed to allow proper assessment and management of any unexpected Aboriginal objects. A sufficiently experienced and qualified archaeologist should be engaged immediately to address the unexpected find and advise further actions. This is a recommended condition for the SSD consent.

## 7.0 REFERENCES

G. F. J. Bergman, 1967, "James Larra (1749-1839)", *Australian Dictionary of Biography*, Vol. 2.

Historical Land Records Viewer.

Narla Environmental, 2020, Carlingford Road and Hepburn Avenue Traffic Signals Upgrade. Report to City of Parramatta.

Spatial Collaboration Portal, *Historical Imagery*.

Transport for NSW, 2021, Pennant Hills Road and North Rocks Road, Carlingford – Intersection Upgrade Addendum review of environmental factors.