

18 March 2026

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Dear Sophia,

Re: Aboriginal Heritage Due Diligence Report – Nos. 23-25 Ashton Avenue, The Entrance

Artefact Heritage and Environment Pty Ltd (Artefact) have been engaged by WPP Planning and Property to prepare an Aboriginal Heritage Due Diligence Report for the proposed mixed use housing development at Nos. 23-25 Ashton Avenue, The Entrance.

This report outlines the results of an Aboriginal Heritage Impact Assessment (AHIA) which meets the requirements 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, and includes recommendations as to whether further archaeological investigation may be required.

This report has been prepared by William Jones (Archaeologist, Artefact Heritage) with management input and review provided by Dr Samantha Higgs (Team Leader, Artefact Heritage).

1.1 Project information

In early-2025, an Expression of Interest was lodged with the NSW Government's HAD outlining a proposed mixed-use development over the Site. The Minister for Planning and Public Spaces subsequently declared that the proposal was 'State Significant Development' (SSD) pursuant to the HAD pathway, and on 19th May 2025 industry-specific Secretary' Environmental Assessment Requirements (SEARs) were issued for the proposal.

The proposal is for the development of a 7-storey mixed-use building on the site. The project is expected to include 40-50 units (mix of studio, 1 & 2 bed units), ground floor commercial tenancies, various ground floor external landscaped areas and courtyards and appropriate levels of car, bike & vehicle parking spaces. The project will include the demolition of existing ground cover surfaces and site remediation. There is the possibility for underground car parking depending on cost and viability.

The study area covers a total approximate area of 2270sqm across the lots identified as:

- Lot 36/2/DP14230,
- Lot 37/2/DP14230
- Lot 24/2/DP14230

The study area is located in the Central Coast LGA and is within the boundaries of Darkinjung Local Aboriginal Land Council (LALC), and the Parish of Tuggerah.

1.2 Housing SEARs and Due Diligence Process

The Planning Secretary's Environmental 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 required:

- Aboriginal Cultural Heritage Assessment Report

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.

This assessment follows 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

Undertaking Due Diligence does not constitute consent to harm Aboriginal objects, nor are they a 'site clearance' mechanism to allow activities to occur in an area where Aboriginal objects are likely or known to be present. Consultation with the Aboriginal community is not a formal requirement of the Due Diligence process, however, consideration of undertaking some form of consultation should occur, particularly if it will assist in informing any decision-making. If an ACHAR will be required, consultation must be undertaken in accordance with the requirements of Section 60 of the *National Parks and Wildlife Regulation 2019*, as described in the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010b).



Figure 1: the study area

2.0 DESKTOP ASSESSMENT

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 Service ID 1082823) was completed on 16 January 2026 for a search area measuring approximately 4 km x 4 km that encompasses the study area (Figure 2). The parameters of this search were:

GDA 1994 MGA 56 357865 – 361865 m E
6307371 – 6311371 m N

A total of 6 registered Aboriginal sites were identified within the search area (Figure 2). There were 0 registered Aboriginal sites within the study area. The closest AHIMS site identified in the search is located approximately 704m east of the study area.

Table 1: Frequency of site features in AHIMS search results

Site Types	Frequency	Percentage
Artefact	2	33.33
Artefact, non-human bone and organic material, potential archaeological deposit (PAD), shell	1	16.66
Burial, non-human bone and organic material	1	16.66
Art (pigment or engraved)	1	16.66
Potential archaeological deposit (PAD)	1	16.66
Total		100.00%

2.1.1 AHIMS ID 45-7-0388

AHIMS ID 45-7-0388 is the closest registered site to the study area, being approximately 704m to the east. It was recorded by Anthony Freeman of Darkinjung Local Aboriginal Land Council on 27th March 2019 as “Cray Fish Engravings.” The site is described as being “located on the rock ledge of the entrance channel, site will be covered with sand and water sometimes of the year. Site has 5 figures.” The rock engravings are listed as three fish, one squid and one cray fish or lobster.

2.1.2 AHIMS ID 45-3-4463

Approximately 1.05km to the northwest of the study area, a Potential Archaeological Deposit (PAD) was registered as Monday Street PAD. The site was recorded on 28th May 2020 by Mrs Tracey Howie of Guringai Tribal Link Aboriginal Corporation. Its landform pattern is a coastal plain, and it is described as a flat terrace area on the western bank of Tuggerah Lake.

2.1.3 AHIMS ID 45-7-0337

Approximately 1.24km north of the study area is registered site AHIMS ID 45-7-0337, listed as The Entrance Bridge Midden. This site was registered on 18th October 2012 Ms Mary-Jean Sutton of Virtus Heritage Pty Ltd. The shell midden site is described as containing shell, non-human bone & organic material and artefacts. The midden is described as having been substantially disturbed by earlier bridge construction and houses constructed on the midden site prior to the construction of The Entrance Bridge, although there are intact lenses of occupation deposit underneath The Entrance Bridge including charcoal, bone, shell and stone artefact that have survived disturbance. Fencing to prevent further disturbance and erosion controls were recommended.

2.1.4 AHIMS ID 45-7-0362

Approximately 1.27km northeast of the study area is registered site AHIMS ID 45-7-0362, listed as Reburial, The Entrance Bridge. It was registered by Dr Mary-Jean Sutton or Virtus Heritage Ptd Ltd on 10th February 2016. The site constitutes a reburial of Aboriginal artefacts in a box containing 19 collected Aboriginal stone artefacts and some salvaged shell material from the above-mentioned The Entrance Bridge Midden (AHIMS ID 45-7-0337). The reburial was excavated approximately 30cm in depth and paperbark was overlaid on the top of the box. In attendance were representatives of Darkinjung LALC and Guringai Tribal Link Aboriginal Corporation.

2.2 Existing archaeological works relevant to understanding the archaeological context of the study area

Existing Aboriginal heritage studies relevant to the study area are summarised in Table 2.

Table 2: Summary of existing Aboriginal heritage studies relevant to the study area

Title of report / author /year	Summary of relevance to the study area
(Vinnicombe, 1980): Predilection and Prediction: A Study of Aboriginal Sites in the Gosford-Wyong Region.	Vinnicombe completed an archaeological survey of the Gosford/Wyong region to determine site type and location patterns. The large-scale assessment involved systematic survey of 10 km² locations within the estuarine zone. A subsequent survey included coastal areas. This survey work resulted in the recording of a number of middens, engravings and rock shelters. The assessment findings clearly identified a regional patterning for site types within the surveyed areas. These findings indicate seasonal exploitation of resources along the coast during the summer months and through the hinterland during the winter months. As part of this assessment Vinnicombe created a predictive landscape model for sites within the Gosford/Wyong region: • Open middens will be located in protected positions near water and shellfish resources • Open campsites commonly occur on relatively level dry ground near water • Sheltered occupation sites are most commonly located in areas of exposed Hawkesbury sandstone above valley floors and below ridgetops • Painted or drawn sites are most common in large shelters immediately below ridge tops • Engraved art sites are more likely to occur on ridge lines and plateau areas of Hawkesbury sandstone • Grinding grooves are the result of tool manufacture and commonly found on sandstone creek beds, at the top of valleys or along water courses, rock pools or ridgetops As the study area is located within the Gosford-Wyong region, this predictive model can be considered valid. The study area is located around 704m away from a known Aboriginal art engraving site on a rock ledge.

2.3 Landscape features that indicate the presence of Aboriginal objects

Aboriginal objects are often associated with particular landscape features as a result of Aboriginal people's use of those features in their everyday lives and for traditional cultural activities. Therefore, it is likely that Aboriginal objects will be present on land that is:

- 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 or above a cliff face, or
- Within 20m of or in a cave, rock shelter, or cave mouth

and is on land that has not been subject to human activity that has changed the lands surface, in a clear and observable manner.

A summary of key environmental context information, including soil types and nearby watercourses, is summarised in Table 3.

Table 3: Key environmental context information relevant to the study area

Environmental Context	Description
Soil	The study area is located within the Norah Head soil landscape (Figure 3). Norah Head soils are located on elevated undulating sand sheet plains to rolling dune fields and sand sheets of windblown sand on coastal headlands. The soils are deep (c.200cm) with an extreme wind erosion hazard and high water erosion hazard. Erosion has likely been stabilised by the high levels of urban development in The Entrance. Vegetation would have also been cleared during development. The soils in this area have very low water-holding capacities (eSPADE, 2026), meaning that any potential surviving Aboriginal artefacts would likely be lithic remains which would survive water damage.
Geology	The geology of the study area is Coastal deposits – bedrock mantling dune facies (Figure 4). There are no sandstone outcroppings in the study area, making it unlikely that there were rock shelters in the area.
Watercourse	The study area is located approximately 480m east of Tuggerah Lake and 770m east of the Pacific Ocean. Both would have provided ample aquatic food resources for Aboriginal people living in the area. An unnamed, minor non-perennial watercourse is located approximately 537m to the south of the study area, and there is a perennial watercourse located approximately 682m to the northeast. As Tuggerah Lake is an estuary and therefore not drinkable water.

2.3.1.1 Disturbance

The [Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales](#) provides the following definition of disturbed land:

Land is disturbed if it has been the subject of a human activity that has changed the land's surface, being changes that remain clear and observable. Examples include ploughing, construction of rural infrastructure (such as dams and fences), construction of roads, trails and tracks (including fire trails and tracks and walking tracks), clearing vegetation, construction of buildings and the erection of other structures, construction or installation of utilities and other similar services (such as above or below ground electrical infrastructure, water or sewerage pipelines, stormwater drainage and other similar infrastructure) and construction of earthworks.

1954 historic aerial imagery shows the study area as partially covered by three structures, appearing to be two residential structures in the north and an outbuilding or shed in the south. Foundation works for these structures during construction may have contributed to ground disturbance in the study area (Figure 6). By 1965, the shed or outbuilding structure in the south of the study area had been removed and the land appeared unoccupied to the south of the two residential structures which were still present. A fence line can be seen between the two properties, and the property in the west of the study area had added more outbuildings between 1954 and 1965, possibly contributing to ground disturbance (Figure 7).

Between 1965 and 1975 the two residential structures were demolished, leaving only minor outbuildings occupying the study area, which otherwise appears completely cleared. This included vegetation clearance as well as demolition of the structures, which would have contributed to ground disturbance (Figure 8). By 1990, the study area had been mostly tarmacked and was in use as a car park, which has been the case until the present day (Figure 9).

The construction and removal of the residential structures in the area prior to 1975, as well as the removal of trees and vegetation in preparation for the study area being tarmacked for use as a car park would have disturbed the natural ground surface. This may have contributed to the disturbance or destruction of Aboriginal artefacts that may have been present in the study area. However, the residential structures did not cover the whole of the study area, and it is unlikely that tarmacking for conversion into a car park would have impacted the ground deep enough to affect the entirety of the Norah Head soils, which have a depth of c.200cm.

A summary of the study area's context in relation to key landscape features is outlined in Table 4. This summary is based on a review of aerial imagery and topographic maps.

Table 4: Landscape features relevant to the study area

Landscape Feature	Presence in study area
Within 200m of water	N The study area is located approximately 480m east of Tuggerah Lake and 770m east of the Pacific Ocean
Located within a sand dune system	Y The study area is located within the Norah Head soil landscape
Located on a ridge top, ridge line, or headland	N
Located within 200m below of a cliff face	N
Within 20m of or in a cave, rock shelter, or cave mouth (Environment 2010)	N



Figure 2: AHIMS site register search results



Figure 3: soil landscape of the study area

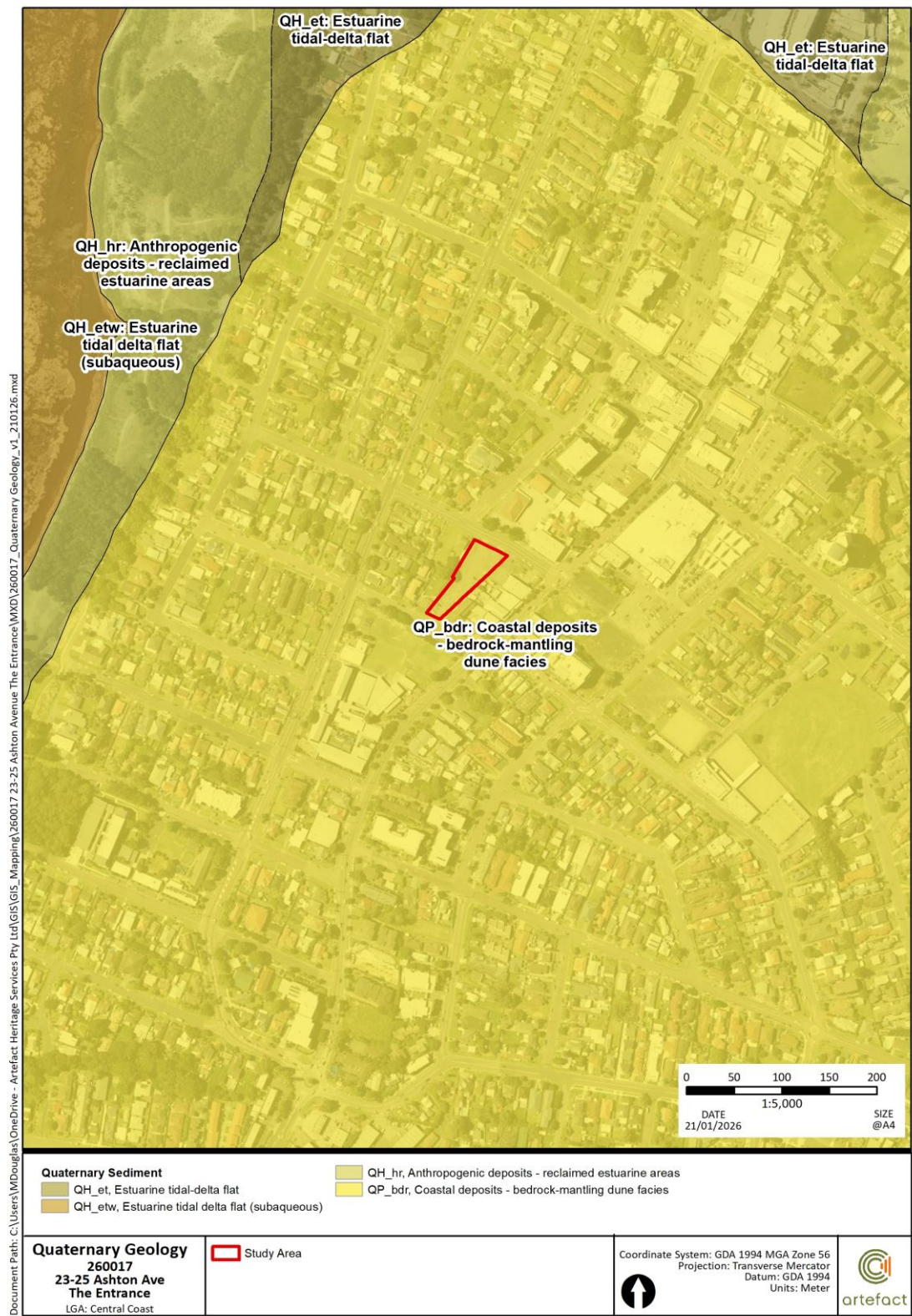


Figure 4: geology of the study area

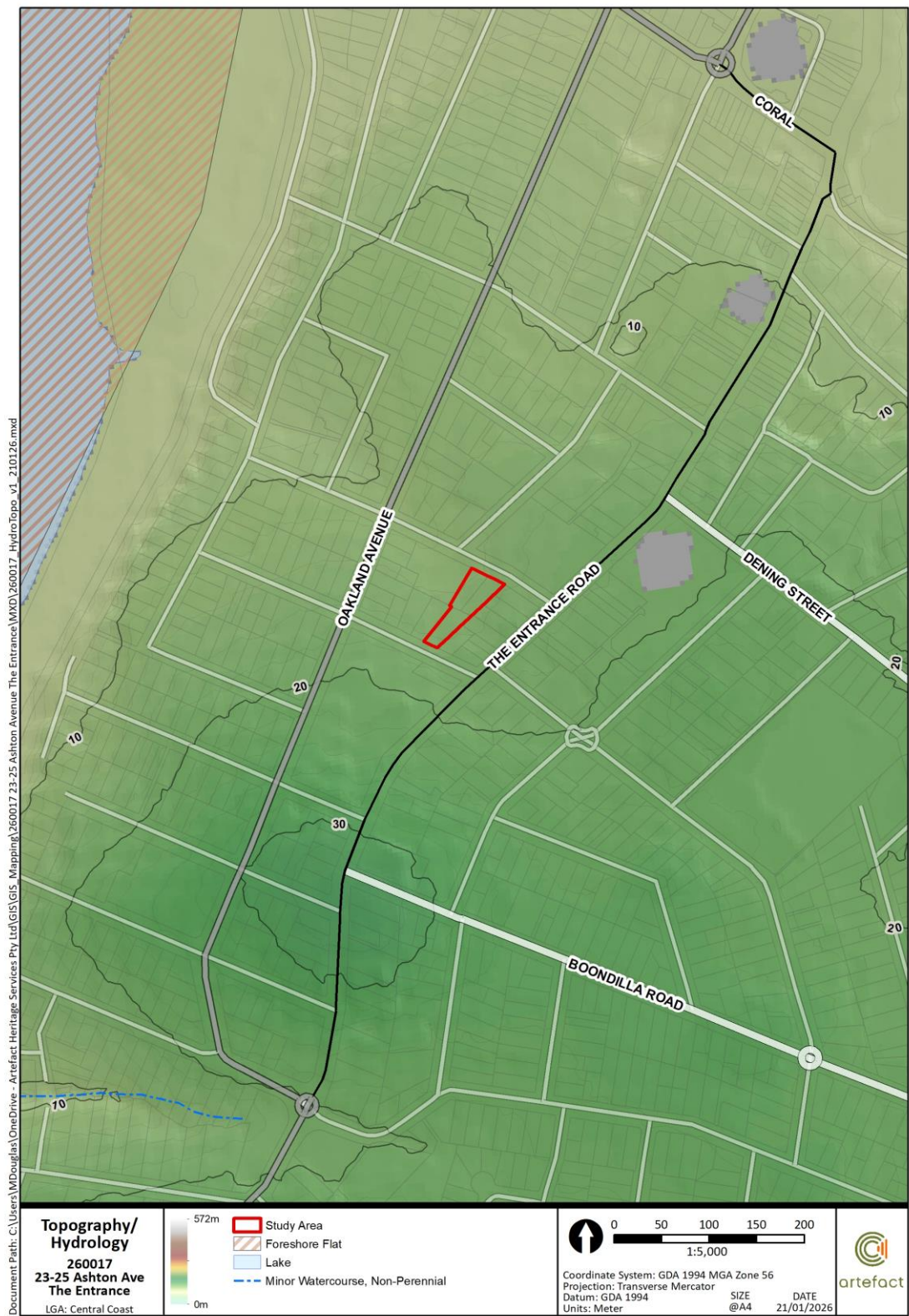


Figure 5: Topography and hydrology of the study area



Figure 6: 1954 historic aerial imagery of the study area



Figure 7: 1965 historic aerial imagery of the study area



Figure 8: 1975 historic aerial imagery of the study area



Figure 9: 1990 historic aerial imagery of the study area

3.0 SITE INSPECTION

3.1 Visual inspection

A visual inspection of the study area was undertaken on 12 February 2026 by Dr Samantha Higgs (Artefact). The study area consists of a long vacant lot between residential and commercial properties with a gentle slope from Campbell Street to Ashton Avenue (South – North), additionally Ashton Avenue has a gentle slope down towards the west. The majority of the study area is covered in bitumen with guttering and drain outlets along the eastern and western boundaries. Some vegetation, mostly ground covers, was present along the eastern and western edges with patches of silty deposit visible. Some of the silt and ground cover appeared to be over bitumen with gravels and bitumen surface visible in patches. The majority of silt and vegetation was over the drainage lines. Overall surface visibility was less than 1%. No Aboriginal objects or areas of potential archaeological deposit were identified.

Figure 11: View South from Ashton Avenue towards Campbell Avenue



Figure 12: View North from Campbell Avenue towards Ashton Avenue



Figure 13: Gutter and drain on eastern side



Figure 14: example of drain found on eastern and western sides of study area



Figure 15: example of typical ground cover and soil exposure over bitumen on edges of study area



Figure 16: Vegetated area over drain line on eastern side of study area



3.2 Summary

No Aboriginal objects or areas of potential were identified during the site inspection. Ground surface visibility was very low however the presence of drainage works and previous paving of the area suggests disturbance to the top layers of sediment.

The soil type description and presence of multiple drainage lines within the study area suggest the land can become waterlogged it was dry at the time of the site inspection and the need for drainage may be related to the current paved nature of the study area and surrounds. Current known fresh water sources are not located near to the study area making use of the area as a camping ground resulting in lithic artefact scatters unlikely. There is no sign or record of rock platforms being present that would have held ground water.

The distance to water makes the presence of shell midden unlikely. No rock shelters or platforms are known to have been present within or near the study area making rock art and grinding grooves sites also unlikely to occur.

Therefore, although there is potential for intact deeper levels of natural soils being present beneath the historic disturbance it is assessed that Aboriginal objects are unlikely to be present.

4.0 CONCLUSION AND RECOMMENDATIONS

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

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

It was found that:

- The AHIMS search and visual inspection identified no Aboriginal objects or areas of potential archaeological deposit
- Although there is potential for undisturbed soils to exist beneath the historic disturbance it is assessed that Aboriginal objects are unlikely to be present as the slope of the land and distance to water sources make the study area a less appealing camping site than other nearby areas.
- No record or evidence of sandstone outcropping (platforms or shelters) was found therefore it is unlikely that art or grinding groove sites are present. If buried sandstone platforms or boulders are found during works these should be inspected for Aboriginal engravings and/or grinding grooves prior to removal or disturbance.

4.1 Recommendations

The study area does not contain and is not likely to contain any Aboriginal objects. It is recommended that:

- An Aboriginal Cultural Heritage Assessment Report (ACHAR) is not required and the proposed works can proceed with caution.
- If a natural sandstone platform or boulder is unexpectedly uncovered during works then works should stop until a suitably qualified archaeologist can inspect the sandstone surface for Aboriginal rock engravings and/or grinding grooves.
- 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*. If the activity cannot avoid harm to Aboriginal objects, works cannot proceed until further investigation is undertaken and correct approvals in place.

5.0 REFERENCES

Vinnicombe 1980 Predilection and Prediction: A Study of Aboriginal Sites in the Gosford-Wyong Region.