



Kogarah Golf Club Redevelopment – Concept & Early Works SSDA (SSD-84467726)

Aboriginal Cultural Heritage Assessment

Final Report

Prepared for Stockland Development Pty Limited

25 March 2026

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Biosis acknowledges the Aboriginal and Torres Strait Islander peoples as Traditional Custodians of the land on which we live and work.

We pay our respects to the Traditional Custodians and Elders past and present and honour their connection to Country and ongoing contribution to society.

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Summary

This Aboriginal Cultural Heritage Assessment (ACHA) has been prepared for Stockland Development Pty Limited (Stockland) to accompany a State Significant Development Application (SSDA) [REDACTED] for a Concept Masterplan and Early Works associated with the Kogarah Golf Club Redevelopment located on land identified as [REDACTED] (the site/study area).

This report addresses the relevant Planning Secretary's Environmental Assessment Requirements (SEARs) for a State Significant Development Application (SSDA) SSD-84467726 to help determine if the proposed development is likely to have a significant effect on the environment, including Aboriginal cultural heritage.

Consultation

The Aboriginal community was consulted regarding the heritage management of the project throughout its lifespan. Consultation has been undertaken as per the process outlined in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010) (consultation requirements) (Appendix 1). The appropriate government bodies were notified, and advertisements placed in the *Illawarra Mercury* newspaper (20 October 2025), which resulted in the following Aboriginal organisations registering their interest (Table 1):

Table 1 List of registered Aboriginal parties and group contact

No.	Organisation	Contact person
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]

A search conducted by the Office of the Registrar, *Aboriginal Land Rights Act 1983* listed no Aboriginal Owners with land within the study area. A search conducted by the National Native Title Tribunal (NNTT) listed no Registered Native Title Claims, Unregistered Claimant Applications or Registered Indigenous Land Use Agreements within the study area.

Upon registration (Appendix 2), the Aboriginal parties were invited to provide their knowledge on the study area and on the proposal provided in Methodology (Appendix 3). The responses identify the study area as being within a significant landscape, with the potential for middens to exist throughout. Responses from the Registered Aboriginal Parties (RAPs) are included in Appendix 3.

Jordan Marr (Cultural Sites Officer) and Josh Marr (Cultural Sites Officer) from Metro Local Aboriginal Land Council (LALC) participated in the field investigation and provided comment on the study area with regard to the proposal. Both noted that the shell deposits observed across the site are a strong indication of the high significance of the site, per its proximity to the Cooks River and an established understanding of the area's historical significance for local Aboriginal peoples. It was also noted that the significance of the Cooks River has been generally underexplored by archaeological investigations and therefore the study area presents an important opportunity for ongoing Connection with Country.

The outcome of the consultation process was that the RAPs considered the study area to have a high level of cultural significance in regards to its location in proximity to Cooks River and its potential use and presence of middens. The results of the consultation process are included in this document Appendix 4.

The recommendations that resulted from the consultation process are provided below.

Results

The ACHAR undertook background research for the proposed study area. Key considerations arising from the background research include:

- High disturbance of the study area from historical use, including agriculture, the presence of a sewerage farm, transition to golf course and redirection of Cooks River. Historical sources outline the burning of middens for lime sources in its proximity.
- Aboriginal Heritage Information Management System (AHIMS) search results indicated the most common site types in the region are artefact, shell and Potential Archaeological Deposit (PAD).
- Previous assessments within the study area included geotechnical investigations which indicated fill was present across the study area ranging from 0.5 to 1.8 metres.

There are 104 Aboriginal cultural heritage sites registered with the Aboriginal Heritage Information Management System [REDACTED]

[REDACTED] None of these sites are within the study area.

Biosis undertook a field investigation which identified no Aboriginal heritage sites within the study area (Table 2). The archaeological survey was hampered by poor Ground Surface Visibility (GSV) and exposure. Visibility and exposure were more prevalent in areas of disturbance and in areas of lower grass coverage such as under trees.

Surface shell inclusions and disturbances

During the archaeological survey bleached shell was identified across the study area eroding out of fill where GSV was high underneath trees, within the walls of sand bunkers, or where grass was otherwise not present. The shell was comprised of individuals varying highly in size, with most being small individuals that would not be considered edible. Species varied and included inedible and edible species such as *Anadara trapezia* Sydney cockle, and *Ostreidae* Oyster. There was a lack of stratigraphy evident, with no clear shell lenses (defined as a distinct, concentrated layer or pocket of shell material within a midden deposit) or intact soil layers present. No evidence of cooking (burn marks or charcoal) or other remains typically seen within middens (such as other edible animal species such as fish bones, or stone tools) were present. This suggests that the shell may originate from either a redeposited shell midden or a natural deposit, such as one formed by fluvial processes.

Archaeological assessments previously undertaken within the study area (Biosis 2001, 2023; AECOM 2015) have investigated and confirmed extensive high-level disturbances to the natural soil profile. AECOM (2015)

determined that these underlying deposits were likely also disturbed and that there was therefore no archaeological sensitivity for the area. Biosis (2023) also concluded that even if the natural soil deposits are present *in situ*, they would be located beneath the current groundwater level and have low potential to contain archaeological deposits.

Available borehole data for the project shows that the current soil profiles within the study area consist of imported fill to a depth of 0.5 to 1.8 metres, overlying interbedded sands and clays, which in turn overly sandstone bedrock at a depth of between 9 and 33 metres (Jeffery and Katauskas 2008, p. 5). If any intact archaeological material were to be present within the study area, it would be located within the interbedded clays and sands underlying the fill. The depositional sequences between the boreholes suggests that the interbedded sands and clays across the entire study area were created through extensive filling of a mixture of the Birrong and Warriewood soil landscapes. The groundwater depth and seepage also indicates the original area would have been low-lying and marshy (Jeffery and Katauskas 2008, p. 7).

Through observation of the shell material and disturbances within the study area, Biosis has therefore determined that the shell material does not represent intact cultural midden deposits and is unlikely to be cultural midden material. Although some of the shell may be representative of redeposited midden material, the shell material identified is from a highly disturbed context and the origins of the soil and shell material are unclear. While this analysis was not supportive of the recovered shell material being cultural in nature, this does not imply that land around the Cooks River did not once contain several complex Aboriginal shell middens.

Table 2 Site details

Site name	Significance	Type of harm before mitigated	Consequence of unmitigated harm	Consequence of mitigated harm	Recommendations
Study area	None	Direct	No loss of value	No loss of value	- Continued consultation - Monitoring during earthworks - Heritage induction and construction management plan - Unanticipated finds process

Management recommendations

Prior to any development impacts occurring within the study area, the following is recommended:

Recommendation 1: Continued consultation with the RAPs

It is recommended that Stockland continue to inform the RAPs about the progress of the study area throughout the life of the project. This recommendation is in keeping with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* 2010 (DECCW 2010) (consultation requirements).

Recommendation 2: No further archaeological works necessary

Due to the high disturbance prevalent throughout the recent history of the study area and geotechnical works identifying the presence of fill at depths up to 1.8 metres across the site, the study area has been identified as containing low potential for Aboriginal sites to be present. No further archaeological works are necessary.

Recommendation 3: Monitoring during earthworks

The majority, if not all of the evidence of past Aboriginal occupation/ Aboriginal history on the site has since been removed, heavily disturbed or buried under deep landfill. While testing was recommended by the members of Metro LALC who attended the field investigation, the depth of the fill across the site indicates that test excavations would not be effective in this instance. Therefore, in keeping with recommendations from previous assessment Biosis (2023) and consultation it is recommended that monitoring be undertaken by RAPs when excavation past fill layers occurs. This will ensure, that should any Aboriginal archaeology be present it would be identified and properly cared for and was supported by RAPs during Stage 4 consultation.

Recommendation 4: Heritage induction and Construction Environmental Management Plan

While it has been concluded that the study area has been highly disturbed and contains low archaeological potential, the study area is in a location where middens were likely present. Therefore, a heritage induction should be included in the site induction for all personnel. This will inform as to when works should cease and a manager be contacted for further instruction should any potential Aboriginal sites be identified during groundworks. This includes the following items:

- Relevant legislation.
- Location of identified Aboriginal heritage sites, areas of archaeological potential, and areas of archaeological sensitivity.
- Basic identification skills for Aboriginal and non-Aboriginal artefacts and human remains.
- Procedure to follow in the event of an unexpected heritage item find during construction works.
- Procedure to follow in the event of discovery of human remains during construction works.
- Penalties and non-compliance.

This should be included in the Construction Environmental Management Plan (CEMP) for the project, which would also outline the methodology for RAP monitoring (Recommendation 3).

Recommendation 5: Discovery of unanticipated Aboriginal objects

All Aboriginal objects and Places are protected under the NSW *National Parks and Wildlife Act 1947* (NPW Act). It is an offence to knowingly disturb an Aboriginal site without a consent permit issued by Heritage NSW, Department of Climate Change, Energy, the Environment and Water (Heritage NSW). Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying Heritage NSW and Aboriginal stakeholders. This can also be incorporated into the CEMP.

Recommendation 6: Discovery of human remains

If any suspected human remains are discovered during any activity works, all activity in the vicinity must cease immediately. The remains must be left in place and protected from harm or damage. The following contingency plan describes the immediate actions that must be taken in instances where human remains or suspected human remains are discovered. Any such discovery at the study area must follow these steps:

1. **Discovery:** If suspected human remains are discovered all activity in the vicinity must stop to ensure minimal damage is caused to the remains; and the remains must be left in place and protected from harm or damage.

2. **Notification:** Once suspected human skeletal remains have been found, the Coroner's Office and the NSW Police must be notified immediately. Following this, the find will be reported to the Aboriginal parties and Heritage NSW.

This can also be incorporated into the CEMP.

Definitions

ACHAR	Aboriginal Cultural Heritage Assessment Report
AHIMS	Aboriginal Heritage Information Management System
AR	Archaeological Report
Bayside LEP 2021	<i>Bayside Local Environmental Plan 2021</i>
Biosis	Biosis Pty Ltd
BP	Before Present
CBD	Central Business District
CEMP	Construction Environmental Management Plan
Consultation requirements	<i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> (DECCW 2010)
Cth DCCEEW	Australian Commonwealth Department of Climate Change, Energy, the Environment and Water
DECCW	Department of Environment, Climate Change and Water (now Heritage NSW)
DP	Deposited Plan
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
ESD	Ecologically Sustainable Development
GFA	Gross Floor Area
GPS	Global Positioning System
GSV	Ground Surface Visibility
Heritage NSW	Heritage NSW, NSW Department of Climate Change, Energy, the Environment and Water
ICOMOS	International Council on Monuments and Sites
LALC	Local Aboriginal Land Council
LGA	Local Government Area
NNTT	National Native Title Tribunal
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPWS	National Parks and Wildlife Service
NSW	New South Wales
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
NTSCORP	Native Title Services Corporation
PAD	Potential Archaeological Deposit
RAPs	Registered Aboriginal Parties
SEARs	Secretary's Environmental Assessment Requirements
The site/the study area	13-19A Marsh Street, Arncliffe (Lot 31 DP 1231486, Lot 100 DP 1231954, Lot 60 DP 1301057, Lot 61 DP 1301057, Lot 62 DP 1301057, Lot 63 DP 1301057, Lot 1 DP 329283, Lot 12 DP 570900, Lot 102 DP 1231954, Lot 103 DP 1231954)
Stockland	Stockland Development Pty Limited

SSDA	State Significant Development Application
The Code	<i>Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW</i>

1 Introduction

This ACHAR has been prepared for Stockland to accompany a SSDA (SSD-84467726) for a Concept Masterplan and Early Works associated with the Kogarah Golf Club Redevelopment located on land identified as 13-19A Marsh Street, Arncliffe (the site).

The vision for the Kogarah Golf Club Redevelopment is to create a world-class precinct that leverages the site's strategic location adjacent to Sydney Airport and strong transport connections by delivering multi-level logistics development, trade-related enterprise and supporting uses with publicly accessible open space. It seeks to deliver state-of-the-art facilities that will redefine the logistics landscape in Australia, setting new benchmarks for scale, efficiency, sustainability and innovation.

The Concept & Early Works SSDA seeks consent for an overarching Concept Masterplan that establishes maximum building envelopes, Gross Floor Area (GFA), land uses, and other parameters through Urban Design Guidelines and technical reporting. It also seeks consent for the carrying out of Early Works to facilitate the initial site preparation and infrastructure works required to support future development and publicly accessible open space.

1.1 Secretary's Environmental Assessment Requirements

This report addresses the relevant Planning SEARs for SSD-84467726, as outlined in Table 3 below.

Table 3 SEARs compliance table

Relevant Requirements	Response
Aboriginal Cultural Heritage	
An Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with the <i>Code of Practice for Archaeological Investigation in NSW</i> (DECCW 2010), and guided by the <i>Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales</i> (OEH 2011). The ACHAR must: • identify, describe and assess impacts on the Aboriginal cultural heritage values that exist across the development site. • provide evidence and details of consultation with Aboriginal people in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW 2010). • include results of a surface survey and any test excavations and an unexpected finds protocol.	This ACHAR report has been prepared in accordance with the <i>Code of Practice for Archaeological Investigation in NSW</i> (DECCW 2010), and guided by the <i>Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales</i> (OEH 2011). • Section 2, 3 and 5 to 7 of this report and the AR in Appendix 6 identify, describe and assess impacts on the Aboriginal cultural heritage values that exist across the development site. • Section 4 and Appendix 1 to 5 of this report provide evidence and details of consultation with Aboriginal people in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents</i> (DECCW 2010). • Section 4 in the AR in Appendix 6 includes results of the surface survey. The recommendations outline an unexpected finds protocol.

1.2 Site description

The site is identified as 13-19A Marsh Street, Arncliffe within the Bayside Local Government Area (LGA). It is situated to the immediate west of the Cooks River and Sydney Airport, located approximately 6km west of Port Botany and 10km south of the Sydney Central Business District (CBD). It includes frontages to Marsh Street, providing direct access to the M5 Motorway, Sydney Airport and St Peters Interchange (via the Sydney Gateway).

The site comprises land associated with nine (9) allotments and a total area of approximately 32 hectares. The existing uses include the previous Kogarah Golf Club (vacated in March 2025) accessed via Levey Street and the temporary M6 Stage 1 construction compound accessed directly from Marsh Street.

The development area represents Lot 31 D P1231486 and Lot 100 DP 1231954, excluding land subject to future dedication to Bayside Council. It comprises an area of approximately 16.7 hectares and is zoned SP4 Enterprise and C2 Environmental Conservation under the Bayside LEP 2021.

The site is described in Table 4, with the extent of the site and development area depicted in Figure 1.

Table 4 Site Description

Lot/DP	Address	Ownership
Lot 31 DP 1231486	19 Marsh Street, Arncliffe	Cook Cove Nominees No 1 Pty Ltd as trustee of Cook Cove Property Trust 1
Lot 100 DP 1231954	19A Marsh Street, Arncliffe	Cook Cove Nominees No 2 Pty Ltd as trustee of Cook Cove Property Trust 2
Lot 60 DP 1301057	13 Marsh Street, Arncliffe	Bayside Council
Lot 61 DP 1301057	19 Marsh Street, Arncliffe	
Lot 62 DP 1301057	Marsh Street, Arncliffe	Transport for NSW
Lot 63 DP 1301057	Marsh Street, Arncliffe	
Lot 12 DP 570900	Marsh Street, Arncliffe	
Lot 102 DP 1231954	Marsh Street, Arncliffe	
Lot 103 DP 1231954	Marsh Street, Arncliffe	



Figure 1 Site Aerial Map (Source: Nearmap, edited by Colliers Urban Planning)

1.3 Project description

The Concept & Early Works SSDA seeks consent for the following:

- Concept Masterplan to support the staged delivery of the Kogarah Golf Club Redevelopment, including:
 - Maximum building envelopes, including maximum building heights and minimum building setbacks;
 - Maximum Gross Floor Area (GFA) up to 343,250 m², comprising.
 - 3,250m² of GFA (FSR of 1.25:1) on Lot 31 DP 1231486.
 - 340,000m² of GFA on Lot 100 DP 1231954.
 - Conceptual primary land uses, including:

- Block 1 – Mixed-use and advertising structures.
- Block 2 – Logistics and mixed-use.
- Block 3A – Logistics.
- Block 3B – Logistics.
- Block 3C – Logistics and data centres.
- Urban Design Guidelines to guide future development of the built form and public domain.
- Strategies and mitigation measures to manage potential environmental impacts.
- Early Works to support the future delivery of built form and publicly accessible open space, including:
 - Site preparation works, comprising:
 - Demolition of existing structures.
 - Clearing of existing vegetation.
 - Remediation works.
 - Bulk earthworks, including ground improvement and flood mitigation works.
 - Site servicing and infrastructure works, including:
 - Construction of the Flora Street East extension consistent with Item 3 of the executed Voluntary Planning Agreement with Bayside Council.
 - Construction of stormwater infrastructure.
 - Construction and augmentation of service and utility infrastructure as necessary.

For a detailed description, refer to the Environmental Impact Statement prepared by Colliers Urban Planning.

1.4 Technical assessment

This report details the investigation, consultation and assessment of Aboriginal cultural heritage undertaken for the study area. The Archaeological Report (AR) in Appendix 5 details the findings of the archaeological investigations conducted as part of the ACHA. As required under Section 2.3 of the Code, the AR provides evidence about the material traces of Aboriginal land use to support the conclusions and management recommendations in the ACHAR.

1.5 Planning approvals

The proposed development will be assessed against Part 4 of the *Environmental Planning and Assessment Act 1979 NSW* (EP&A Act). Other relevant legislation and planning instruments that will inform this assessment include:

- *Commonwealth Environment Protection and Biodiversity Conservation Act 1999.*
- NPW Act.
- *NSW National Parks and Wildlife Amendment Act 2010.*
- Bayside LEP 2021.

- *Bayside Development Control Plan 2022.*

1.6 Restricted and confidential information

Appendix 5 in the AR contains AHIMS information which is confidential and not to be made public. This is clearly marked on the title page for the Attachment.

1.7 Aboriginal cultural heritage

1.7.1 General description

According to (Allen & O'Connell 2003), Aboriginal people have inhabited the Australian continent for the last 50,000 years. New evidence out of the Northern Territory has pushed this date back with the Malakanunja II rock shelter dated at around 65,000 years Before Present (BP) (Clarkson et al. 2017). In NSW, according to Bowler et al. (2003), Aboriginal people have occupied the land for over 42,000 years.

Without being part of the Aboriginal culture and the productions of this culture, it is not possible for non-Aboriginal people to fully understand the meaning of site, objects and places to Aboriginal people – only to move closer towards understanding this meaning with the help of the Aboriginal community. Similarly, definitions of Aboriginal culture and cultural heritage without this involvement constitute outsider interpretations.

With this preface Aboriginal cultural heritage broadly refers to things that relate to Aboriginal culture and hold cultural meaning and significance to Aboriginal people (DECCW 2010, p. 3). There is an understanding in Aboriginal culture that everything is interconnected. In essence Aboriginal cultural heritage can be viewed as potentially encompassing any part of the physical and/or mental landscape, that is, 'Country' (DECCW 2010, p. iii).

Aboriginal people's interpretation of cultural value is based on their 'traditions, observance, lore, customs, beliefs and history' (DECCW 2010, p. 3). The things associated with Aboriginal cultural heritage are continually and actively being defined by Aboriginal people (DECCW 2010, p. 3). These things can be associated with traditional, historical or contemporary Aboriginal culture (DECCW 2010, p. 3).

1.7.2 Tangible Aboriginal cultural heritage

Three categories of tangible Aboriginal cultural heritage may be defined:

- Things that have been observably modified by Aboriginal people.
- Things that may have been modified by Aboriginal people, but no discernible traces of that activity remain.
- Things never physically modified by Aboriginal people (but associated with Dreamtime Ancestors who shaped those things).

1.7.3 Intangible Aboriginal cultural heritage

Examples of intangible Aboriginal cultural heritage would include memories of stories and 'ways of doing', which would include language and ceremonies (DECCW 2010, p. 3).

1.7.4 Statutory

Currently Aboriginal cultural heritage, as statutorily defined by the NPW Act, consists of objects and places which are protected under Part 6 of the Act.

Aboriginal objects are defined as:

any deposit, object or material evidence...relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains

Aboriginal places are defined as a place that is or was of special Aboriginal cultural significance. Places are declared under Section 84 of the NPW Act.

1.7.5 Values

Aboriginal cultural heritage is valued by Aboriginal people as it is used to define their identity as both individuals and as part of a group (DECCW 2010, p. iii). More specifically it is used:

- To provide a:
 - ‘Connection and sense of belonging to Country’ (DECCW 2010, p. iii).
 - Link between the present and the past (DECCW 2010, p. iii).
- As a learning tool to teach Aboriginal culture to younger Aboriginal generations and the general public (DECCW 2010, p. 3).
- As further evidence of Aboriginal occupation prior to European settlement for people who do not understand the magnitude to which Aboriginal people occupied the continent (DECCW 2010a, p. 3).

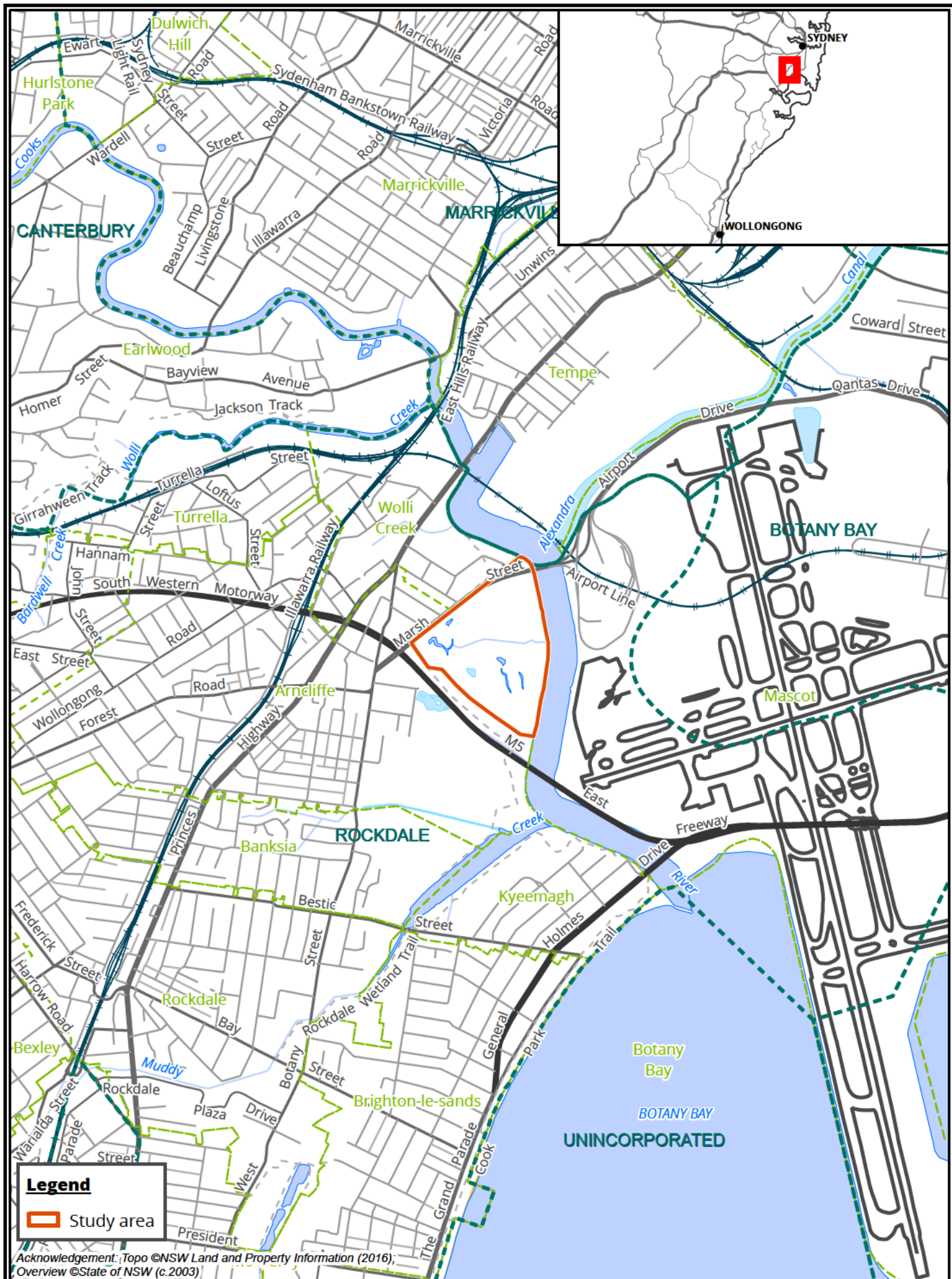
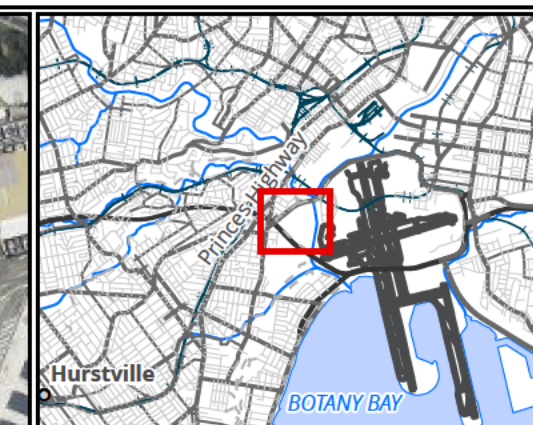


Figure 2 Location of the study area

Matter: 43695, Date: 24 October 2025,
Prepared for: RW, Prepared by: OW, Last edited by: owilliams
Location: P:\43600\43695\Mapping\43695_Kogarah_GC_ACHA
Layout: 43695_ACHA_F1_Locality

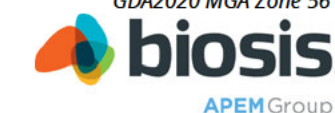


- Legend**
- Study area
 - Lot

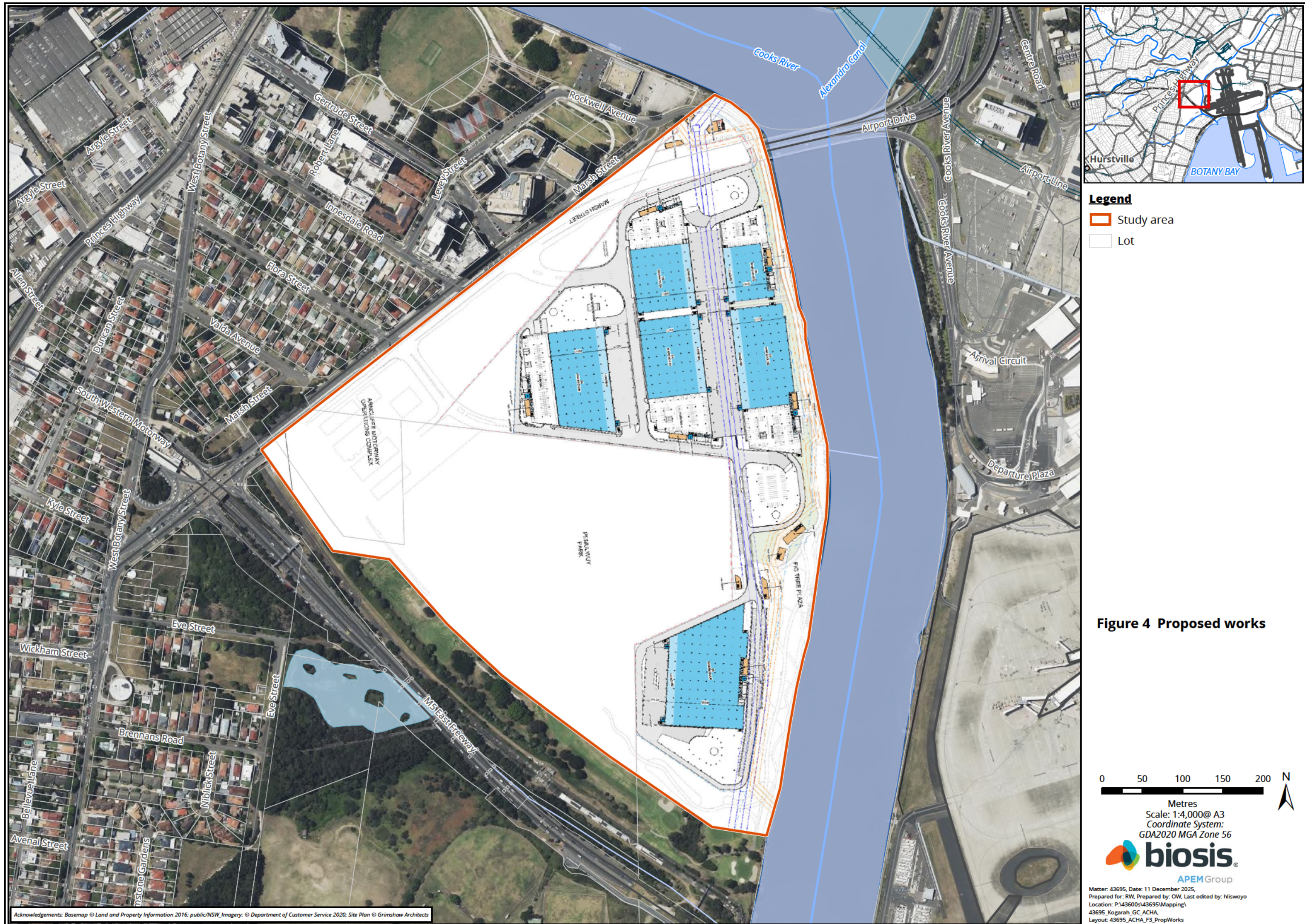
Figure 3 Study area detail



Metres
Scale: 1:4,000@ A3
Coordinate System:
GDA2020 MGA Zone 56



Matter: 43695, Date: 24 October 2025,
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Layout: 43695_ACHA_F2_StudyArea



2 Study area context

This section discusses the study area in regard to its landscape, environmental and Aboriginal cultural heritage context. This section should be read in conjunction with the AR attached in Appendix 5. The background research has been undertaken in accordance with the Code.

2.1 Geology, topography and hydrology

Geologically, the site is situated on the western margins of Botany Bay, bounded to the north and east by the Cooks River and to the south and west by urban settlement of Rockdale. The geological character of the area is described as Quaternary sand, peat and mud deposits, which overlies Hawkesbury Sandstone, present in the northern portion of the study area and common throughout the Sydney basin. The majority of the land in and around the study area was (and in some locations still is) wetland, characterised by level to gently undulating swales, depressions and infilled lagoons on Quaternary sands.

The study area contains a number of landforms but is predominately comprised of flats and gentle slopes. Given the degree of disturbance which exists throughout the site because of historical and recent uses, particularly land reclamation and the landscaping associated with its use as a golf course, an analysis of modern landforms is of limited use in this context.

The study area is located adjacent to the Cooks River, a fourth order perennial source of water, which would have provided an abundance of resources for Aboriginal groups in the area. However, the study area has been subject to extensive disturbance, and the Cooks River has been diverted on a number of occasions in the local area due to land reclamation and the construction of Sydney Airport. As such, the hydrology of the area has been modified significantly, and it is difficult to make firm assessments about the exact location of watercourses prior to European colonisation impacts. It can be stated that the Cooks River would have been in close proximity to the study area and likely flowed through the southern part of it.

More detailed information is provided in the AR (Appendix 5).

2.2 Soil landscapes

The study area is considered disturbed terrain, being predominately comprised of reclaimed land. A small portion of the north-eastern most extent of the study area is also contained within the Birrong soil landscape. The Birrong soil landscape is typically present over the floodplains and watercourses draining the Wianamatta Group shales, including along the Cooks River. Although understanding of soil depths and composition would allow for researchers to examine the potential for subsurface deposits to exist, the extensive disturbance of the terrain suggests intact subsurface deposits are unlikely (Biosis Research 2001).

The AR in Appendix 5 also discusses previous geotechnical investigations which have been completed for the study area and describe the subsurface soils within the site.

2.3 Climate and rainfall

Climate data was provided by the Sydney Airport AMO weather station approximately 1.2 kilometres south-east of the study area (Station No. 066037, Bureau of Meteorology 2025).

- The mean maximum average temperature is highest in January when it reaches 26.7 degrees, and lowest in July at 17.2 degrees.
- The mean minimum temperature is highest in February at 19.2 degrees and lowest in July at 7.4 degrees.
- The average rainfall is highest in June at 123.0 millimetres and lowest in September at 59.8 millimetres.

Because the study area is located adjacent to the Cooks River, a fourth-order perennial water course, it is likely that the study area would have been occupied year-round as water and other resources were present consistently in the area. However, higher levels of rain around June could have initiated flood events, suggesting that there may have been less occupation in the colder months. It is worth recognising that changes in climate over time may have affected Aboriginal occupation patterns across the study area.

2.4 Landscape resources

The area has been extensively cleared of native vegetation; however, the past environment, including the native vegetation would have offered rich resources to the Aboriginal population. Descriptions of the surrounding Lambert, Birong and Warriewood landscapes give an indication of the types of vegetation that may have been native to the study area (NSW DCCEEW 2013).

She-oak *Allocasuarina distyle*, Heath Banksia *Banksia ericifolia*, Spiky Hakea *Hakea teretifolia* occur predominantly and Spider Flowers *Grevillea spp.*, Billy Buttons *Kunzea spp.*, Large Leaf Bush Pea *Pultenaea spp.*, Teatree *Leptospermum*, Native Heath *Epacris spp.*, Coastal Teatree *Leptospermum laevigatum*, Spike Rushes *Eleocharis spp.*, and Tall Swamp Sedge *Gahnia sieberiana* have been observed as shrub species. Modern observations indicate woodland environments are likely to have contained Red Bloodwood *Eucalyptus gummifera*, Yellow-top Ash *E. luehmanniana*, Yellow Bloodwood *E. eximia*, Scribbly Gum *E. haemastoma* and Narrow-leaved Apple *Angophora bakeri*, Ironbark *Eucalyptus paniculata*, Turpentine *Syncarpia glomulifera*, Sydney Blue Gum *E. saligna*, Broad-leaved Paperbark *Melaleuca quinquenervia*, Coastal Banksia *Banksia integrifolia*, Swamp Oak *Casuarina glauca* and Swamp Mahogany *Eucalyptus robusta*.

Native fauna would have included a wide variety of birds, reptiles, kangaroos and wallabies, possums and echidna. These resources would have included terrestrial mammals and avian resources used for food, tool making, and clothing and potentially provide and are interconnected with social and ceremonial aspects of Aboriginal life. Terrestrial and avian resources were not only used for food, but also provided a significant contribution to the social and ceremonial aspects of Aboriginal life through their use as ritual implements or even simply through fashioning as personal adornments (Attenbrow 2010, pp. 107–110). Mammals such as kangaroos and wallabies and arboreal mammals such as possums were used as a food source and also for tool making. Bones and teeth were used as points or barbs for hunting spears and fishing spears. Tail sinews are known to have been used as a fastening cord, whilst 'bone points' frequently occur in rock shelters (Attenbrow 2010, p. 99). Animal skin, fur and sinews were also used for personal adornment and in making cloaks.

In the inner parts of Botany Bay even up as far as Wolli Creek oysters would have been plentiful. Many other mollusc species were eaten, some abundant in the estuaries, such as Whelks *Buccinidae*, Cockles *Cardiidae*, Periwinkles *Littorina littorea* and Snails *Gastropoda*, and others on the rock platforms fringing the headlands such as Rock Oysters *Saccostrea*, Tritons Trumpet *Charonia*, Turbans *Turbinidae*, Limpets *Cellana tramoserica* and Mussels *Mytilus*.

A wide variety of fish was available in the Bay and along the coast. There may also have been the occasional seals *Arctocephalus pusillus doriferus*., dolphins *Delphinidae* and beached whales. Stingrays *Myliobatoidei* were also present in the bay and would have provided a source of food, Captain Cook mentions that stingrays were a welcome addition to the Endeavours rations during his visit to Botany Bay in 1770 (Cook 2003). Flora species such as the Common Lilli Pill *Syzygium smithii* and Cabbage Tree Palm *Livistona australis* and numerous other naturally occurring food plants would have supplemented the local Aboriginal populations' diet.

The landscape itself was well suited for occupation with Hawkesbury sandstone outcrops to the south and west of Cooks Cove affording shelter in the numerous caves and rock overhangs that are found in sandstone country. In addition to a shelter these features were used as sites of Aboriginal art (engravings and paint). Springs and rock pools ensured supplies of fresh water and the grainy stone was used to sharpen tools.

2.5 European land use history

The land use history is summarised below, with further information found in the AR (Appendix 5).

Historical aerial imagery allows for modern developments and land use to be identified within the study area. Table 5 summarises the development of the study area within reference to the historical aerals, which can be found in the AR in Appendix 5. As can be seen the study area has undergone significant levels of disturbance over time which may affect the preservation of Aboriginal sites.

Table 5 Summary of historical aerals

Aerial	Description
1943 (Photo 5 in the AR)	The study area has been extensively cleared of vegetation and there has been development of agricultural fields in the west. The majority of the study area is in use as the sewerage farm with the southern portion appearing flooded by the Cooks River. The original alignment of the Cooks River can be seen to the north-east of the study area. Archaeological material within the study area has likely been removed from its context or destroyed.
1955 (Photo 6 in the AR)	The agricultural fields and sewerage farm are still present. The Cooks River has been diverted from its original path to its current location adjacent to the study area.
1971 (Photo 7 in the AR)	The current Kogarah Golf Course has been constructed at this stage. The land has been modified entirely with the establishment of sandpits, small dams, and the golf course itself. Any remaining archaeological material in study area will have been greatly impacted by this development.
Current (Figure 3)	The golf course has been further developed. Vegetation replanting has taken place, dams extended and renovated, and more sandpits installed. The Motorway Operations Centres has been constructed in the west of the study area. This construction (subsurface service installation, foundation establishment, landscape modification as some examples) would have severely impact archaeological material that was remaining in this area.

3 Aboriginal cultural heritage context

3.1 Ethnohistory

It is generally accepted that Aboriginal people have inhabited the Australian landmass for the last 65,000 years (Clarkson et al. 2015). Dates of the earliest occupation of the continent by Aboriginal people are subject to continued revision as more research is undertaken. The timing for the human occupation of the Sydney Basin is still uncertain. While there is some possible evidence for occupation of the region around 40,000 years ago, the earliest known radiocarbon date for the Aboriginal occupation of the Sydney Basin is associated with a cultural / archaeological deposit at Parramatta, which was dated to $30,735 \pm 407$ BP (JMCHM 2005a, JMCHM 2005b).

Our knowledge of Aboriginal people and their land-use patterns and lifestyles prior to European contact is mainly reliant on documents written by non-Aboriginal people. These documents are affected by the inherent bias of the class and cultures of their authors, who were also often describing a culture that they did not fully understand - a culture that was in a heightened state of disruption given the arrival of settlers and disease. Early written records can however be used in conjunction with archaeological information and surviving oral histories from members of the Aboriginal community in order to gain a picture of Aboriginal life in the region.

Despite a proliferation of Aboriginal heritage sites there is considerable ongoing debate about the nature, territory and range of pre-contact Aboriginal language groups in the greater Sydney region. These debates have arisen largely because, by the time colonial diarists, missionaries and proto-anthropologists began making detailed records of Aboriginal people in the late 19th century, pre-European Aboriginal groups had been broken up and reconfigured by European settlement activity.

There is some confusion relating to group names, which can be explained by the use of differing terminologies in early historical references. Language groups were not the main political or social units in Aboriginal life. Instead, land custodianship and ownership centred on the smaller named groups that comprised the broader language grouping. There is some variation in the terminology used to categorise these smaller groups; the terms used by Attenbrow (2010) will be used here.

The study area is within the Eora or coastal Darug language group, in the vicinity of three clans, the Wangal, Cadigal and Gameygal. Attenbrow (2010, p. 34) suggests the coastal Darug covered the area “the Sydney Peninsula (north of Botany Bay, south of Port Jackson, west to Parramatta), as well as the country to the north of Port Jackson, possibly as far as Broken Bay”. This area is considered to be indicative only and would have changed through time.

After the arrival of European settlers the movement of Aboriginal people became increasingly restricted. European expansion within the Sydney region was swift and soon there had been considerable loss of land to agriculture. At the same time diseases such as small pox were having a devastating effect on the Aboriginal population. Death, warfare, starvation and disease were some of the disrupting factors that led to a reorganisation of the social practices of Aboriginal communities after European contact. The formation of new social groups and alliances were made as Aboriginal people met the challenges of invasion, disease, warfare and the cultural influx.

3.2 Interpretation of past Aboriginal land use

The study area is bound to the north and east by the Cooks River and is underlain by the Hawkesbury Sandstone geological formation. The proximity of Cooks River, a fourth-order perennial watercourse, would generally suggest a high likelihood that Aboriginal sites and archaeological deposits would be present within the study area. This is due to the abundance of resources that the watercourse would have provided. It should be noted however, that the original alignment of the Cooks River is to the north-east instead of directly adjacent of the study area (Section 3.1.4 in the AR). The underlying Hawksbury Sandstone could also indicate potential for grinding groove sites to be present.

Previous archaeological assessments (AMBS 2003; JMCHM 2005c, 2006) undertaken to the north of the study area within undisturbed areas have recovered stone artefacts, estuarine shell and animal bone fragments, middens, and hearths. However, archaeological assessments previously undertaken within the study area (Biosis 2001, 2023; AECOM 2015) have investigated and confirmed extensive high-level disturbances to the natural soil profile. AECOM (2015) determined that these underlying deposits were likely also disturbed and that there was therefore no archaeological sensitivity for the area. Biosis (2023) also concluded that even if the natural soil deposits are present *in situ*, they would be located beneath the current groundwater level and have low potential to contain archaeological deposits.

Available borehole data for the project shows that the current soil profiles within the study area consist of imported fill to a depth of 0.5 to 1.8 metres, overlying interbedded sands and clays, which in turn overly sandstone bedrock at a depth of between 9 and 33 metres (Jeffery and Katauskas 2008, p. 5). If any intact archaeological material were to be present within the study area, it would be located within the interbedded clays and sands underlying the fill. The depositional sequences between the boreholes suggests that the interbedded sands and clays across the entire study area were created through extensive filling of a mixture of the Birrong and Warriewood soil landscapes. The current groundwater depth and seepage also indicates the original area would have been low-lying and marshy (Jeffery and Katauskas 2008, p. 7).

During the archaeological survey undertaken for this ACHAR, bleached shell was identified across the study area eroding out of fill where GSV was high underneath trees, within the walls of sand bunkers, or where grass was otherwise not present. The shell was comprised of individuals varying highly in size, with most being small individuals that would not be considered edible. Species varied and included inedible and edible species such as *Anadara trapezia* Sydney cockle, and *Ostreidae* Oyster. There was a lack of stratigraphy evident, with no clear shell lenses (a distinct, concentrated layer or pocket of shell material within a midden deposit) or intact soil layers present. No evidence of cooking (burn marks or charcoal) or other remains typically seen within middens (such as other edible animal species such as fish bones, or stone tools) were present. This suggests that the shell may originate from either a redeposited shell midden or a natural deposit, such as one formed by fluvial processes.

Through observation of the shell material and disturbances within the study area, Biosis has therefore determined that the shell material does not represent intact cultural midden deposits and is unlikely to be cultural midden material. Although some of the shell may be representative of redeposited midden material, the shell material identified is from a highly disturbed context and the origins of the soil and shell material are unclear. While this analysis was not supportive of the recovered shell material being cultural in nature, this does not imply that land around the Cooks River did not once contain several complex Aboriginal shell middens.

Consultation with the Aboriginal community has been undertaken in compliance with the consultation requirements as detailed below. A consultation log of all communications with RAPs is provided in Appendix 1.

4.1.1 Identification of relevant Aboriginal stakeholders

- Bayside Council.
- Heritage NSW.
- NSW Native Title Services Corporation Limited (NTSCORP Limited).
- Office of the Registrar, *Aboriginal Land Rights Act 1983* of Aboriginal Owners.
- NNTT.
- Greater Sydney Local Land Services.
- Metropolitan LALC.

Group	Yes (%)	No (%)
People who have been in a relationship for 10 years or more	85	15
People who have been in a relationship for less than 10 years	75	25

Relationship Factor	People who have been in a relationship for 10 years or more (%)	People who have been in a relationship for less than 10 years (%)
Communication	~85%	~85%
Trust	~85%	~85%
Respect	~85%	~85%
Support	~85%	~85%
Intimacy	~85%	~85%
Shared interests	~85%	~85%
Conflict resolution	~85%	~85%
Emotional connection	~85%	~85%
Physical attraction	~85%	~85%
Shared goals	~85%	~85%
Communication	~85%	~85%
Trust	~85%	~85%
Respect	~85%	~85%
Support	~85%	~85%
Intimacy	~85%	~85%
Shared interests	~85%	~85%
Conflict resolution	~85%	~85%
Emotional connection	~85%	~85%
Physical attraction	~85%	~85%
Shared goals	~85%	~85%

4.1.2 Public notice

- *Illawarra Mercury* (20 October 2025)

4.1.3 Registration of Aboriginal parties

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Table 6 List of RAPs

No.	Organisation	Contact person
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4.2 Stage 2: Presentation of information about the proposed project

On 17 November 2025 Biosis provided RAPs with details about the proposed development works (project information pack). A copy of the project information pack is provided in Appendix 3.

Biosis received responses from two of the RAP groups in regards to the methodology:

- █ Site Specialist [3] called on 18/11/2025 to get more of an idea about existing disturbances. He acknowledged the historical impacts would have been significant but noted other instances where sites had been recorded on golf courses. An email follow up was sent on 22/11/2025 where he expressed agreement with the methodology. A copy of this correspondence is provided in Appendix 3.
- █ [6] emailed on 01/12/2025 agreeing with the proposed methodology.

4.3 Stage 3: Gathering information about cultural significance

4.3.1 Archaeological assessment methodology information pack

On 17 November 2025, Biosis provided each RAP with a copy of the project methodology pack outlining the proposed ACHAR process and methodology for this project. RAPs were given 28 days to review and prepare feedback on the proposed methodology. A copy of the project methodology pack is provided in Appendix 3.

Biosis received responses from one of the RAP groups in regards to the cultural significance of the study area:

- █ [3] called on 18/11/2025 and raised the significance of the landscape being in proximity to Cooks River based on his family's relationship to the area. He also acknowledged the historical impacts would have been significant but noted other instances where sites had been recorded on golf courses.

4.3.2 Information gathered during fieldwork

Jordan Marr (Cultural Sites Officer) and Josh Marr (Cultural Sites Officer) from Metro LALC attended the archaeological field investigation on 8 December 2025. Background to the historical disturbances undertaken across the site were provided during discussions onsite by Biosis representatives Maggie Butcher (Team Leader NSW Heritage) and Megan Porter (Graduate Heritage Consultant). During the archaeological field investigation several comments were made and are noted below:

- That the propensity of the shell across the site was a strong indication of the high significance of the site, but acknowledged the heavy disturbances that have led to the spread the shell across the site. Both acknowledged that no cultural midden origin could be identified. This raised concerns about the scale of “unknowns” within the study area and so recommended that test excavations be undertaken to locate the cultural midden origins prior to works taking place.
- Recommended that monitoring be undertaken during subsequent works.
- Visited the client’s potential midden site and reiterated the above comments.
- Identified comparative case studies to support observations made on site, including:
 - Current Timbrell Park investigations that are concerned with a large shell deposit
 - Warratah Park where a large sandstone escarpment was identified as a significant landform for cultural material during subsurface investigations. It was noted that the site had appeared similar to Kogarah Golf Club on the surface and that sandstone was observed within at least one exposure at Kogarah Golf Club.
- Recommended that cultural awareness training and a Connecting with Country plan be implemented.

4.4 Stage 4: Review of draft ACHAR

On 20 February 2026, Biosis provided each RAP with a copy of the draft ACHA and AR for review. RAPs were given 28 days to review and prepare feedback on the proposed methodology. A reminder email was also sent on 13 March 2026 to RAPs that had not yet provided a response. A copy of responses is provided following and in Appendix 4.

Biosis received responses from two of the RAP groups in regard to the draft reports:

- [REDACTED] emailed on 27/02/2026 to acknowledge that the draft reports had been received.
- [REDACTED] [6] emailed on 10/03/2026 agreeing and supporting the recommendations made in the report, requesting that if testing cannot be done for the study area that monitoring be undertaken during earthworks.
- Carolyn Hickey from A1 Indigenous Services [1] emailed on 13/03/2026 agreeing and supporting the recommendations made in the report. A1 has requested that this email is not published.

No additional comments were received as part of Stage 4 consultation.

5 Aboriginal cultural significance assessment

The two main values addressed when assessing the significance of Aboriginal sites are cultural values to the Aboriginal community and archaeological (scientific) values. This report will assess the cultural values of Aboriginal sites in the study area. Details of the scientific significance assessment of Aboriginal sites in the study area are provided in Appendix 5.

5.1 Introduction to the assessment process

Heritage assessment criteria in NSW fall broadly within the significance values outlined in the Australia International Council on Monuments and Sites (ICOMOS) *Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (Australia ICOMOS 2013) (the Burra Charter). This approach to heritage has been adopted by cultural heritage managers and government agencies as the set of guidelines for best practice heritage management in Australia. These values are provided as background and include:

- **Historical significance** (evolution and association) refers to historic values and encompasses the history of aesthetics, science and society, and therefore to a large extent underlies all of the terms set out in this section. A place may have historic value because it has influenced, or has been influenced by, a historic figure, event, phase or activity. It may also have historic value as the site of an important event. For any given place the significance will be greater where evidence of the association or event survives in situ, or where the settings are substantially intact, than where it has been changed or evidence does not survive. However, some events or associations may be so important that the place retains significance regardless of subsequent treatment.
- **Aesthetic significance** (Scenic/architectural qualities, creative accomplishment) refers to the sensory, scenic, architectural and creative aspects of the place. It is often closely linked with social values and may include consideration of form, scale, colour, texture, and material of the fabric or landscape, and the smell and sounds associated with the place and its use.
- **Social significance** (contemporary community esteem) refers to the spiritual, traditional, historical or contemporary associations and attachment that the place or area has for the present-day community. Places of social significance have associations with contemporary community identity. These places can have associations with tragic or warmly remembered experiences, periods or events. Communities can experience a sense of loss should a place of social significance be damaged or destroyed. These aspects of heritage significance can only be determined through consultative processes with local communities.
- **Scientific significance** (Archaeological, industrial, educational, research potential and scientific significance values) refers to the importance of a landscape, area, place or object because of its archaeological and/or other technical aspects. Assessment of scientific value is often based on the likely research potential of the area, place or object and will consider the importance of the data involved, its rarity, quality or representativeness, and the degree to which it may contribute further substantial information.

The cultural and archaeological significance of Aboriginal and historic sites and places is assessed on the basis of the significance values outlined above. As well as the Burra Charter significance values guidelines, various government agencies have developed formal criteria and guidelines that have application when assessing the significance of heritage places within NSW. Of primary interest are guidelines prepared by the Australian

Government, Heritage NSW and the Heritage Branch, and the NSW Heritage. The relevant sections of these guidelines are presented below.

These guidelines state that an area may contain evidence and associations which demonstrate one or any combination of the Burra Charter significance values outlined above in reference to Aboriginal heritage. Reference to each of the values should be made when evaluating archaeological and cultural significance for Aboriginal sites and places.

In addition to the previously outlined heritage values, the Heritage *NSW Guidelines to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (Office of Environment and Heritage, Department of Premier and Cabinet 2011) also specify the importance of considering cultural landscapes when determining and assessing Aboriginal heritage values. The principle behind a cultural landscape is that ‘the significance of individual features is derived from their inter-relatedness within the cultural landscape’. This means that sites or places cannot be ‘assessed in isolation’ but must be considered as parts of the wider cultural landscape. Hence the site or place will possibly have values derived from its association with other sites and places. By investigating the associations between sites, places, and (for example) natural resources in the cultural landscape the stories behind the features can be told. The context of the cultural landscape can unlock ‘better understanding of the cultural meaning and importance’ of sites and places.

Although other values may be considered – such as educational or tourism values – the two principal values that are likely to be addressed in consideration of Aboriginal sites and places are the cultural/social significance to Aboriginal people and their archaeological or scientific significance to archaeologists and the Aboriginal community. The determinations of archaeological and cultural significance for sites and places should then be expressed as statements of significance that preface a concise discussion of the contributing factors to Aboriginal cultural heritage significance.

5.2 Cultural (social significance) values

Cultural or social significance refers to the spiritual, traditional, historical and/or contemporary associations and values attached to a place or objects by Aboriginal people. Aboriginal cultural heritage is broadly valued by Aboriginal people as it is used to define their identity as both individuals and as part of a group (DECCW 2010, p. iii). More specifically it provides:

- A ‘connection and sense of belonging to Country’ (DECCW 2010, p. iii).
- A link between the present and the past (DECCW 2010, p. 3).
- A learning tool to teach Aboriginal culture to younger Aboriginal generations and the general public (DECCW 2010, p. 3).
- Further evidence of Aboriginal occupation prior to European settlement for people who do not understand the magnitude to which Aboriginal people occupied the continent (DECCW 2010, p. 3).

It is acknowledged that Aboriginal people are the primary determiners of the cultural significance of Aboriginal cultural heritage. During consultation the following information was provided by RAPs in regard to the cultural values of the study area.

- [REDACTED] called on 18/11/2025 and raised the significance of the landscape being in proximity to Cooks River based on his family’s relationship to the area. He also acknowledged the historical impacts would have been significant but noted other instances where sites had been recorded on golf courses.

- Jordan Marr (Cultural Sites Officer) and Josh Marr (Cultural Sites Officer) from Metro LALC participated in the field investigation and advised of the significance of the site per its proximity to the Cooks River, observations of shell deposits, and an established understanding of the area's historical significance for local Aboriginal peoples. It was noted that the significance of the Cooks River has been generally underexplored by archaeological investigations and therefore the study area presents an important opportunity for ongoing Connection with Country.

5.3 Historic values

Historic significance refers to associations a place or object may have with a historically important person, event, phase or activity to the Aboriginal and other communities. The study area is not known to have any historic associations. See Biosis (2025) *Kogarah Golf Club Redevelopment – Concept & Early Works SSDA (SSD-84467726): Historical Archaeological Assessment* for extensive site history.

5.4 Archaeological (scientific significance) values

An archaeological scientific assessment was undertaken for the study area and is presented in detail as part of the attached AR (Appendix 5).

5.5 Aesthetic values

There is a diverse yet accessible literature regarding the identification of aesthetic values and determining aesthetic significance (Burke & Smith 2004, pp. 248–249). It is generally agreed that aesthetic values are an important part of cultural heritage significance; however, they are dependent on an individual's sensory response, which means determining aesthetic value is fraught with difficulty, and should be applied on a case-by-case basis as it is not always a value applicable to archaeological sites. However, when dealing with some types of sites aesthetic values and landscape context are an important consideration. The question 'does the place have a relationship between its parts and the setting which reinforces the quality of both', while originally proposed in an architectural context (Kerr 2013, p. 15), is relevant also for many sites in a local setting—such as in forests, deserts, or coastlines, where there is often an important relationship between cultural sites and the natural environment, which contribute to the values of a 'sense of place'.

The study area is heavily disturbed and has no reflection of its original landscape (swampy low lying land) in its natural context. The original alignment of the Cooks River was situated much more to the north-east instead of being adjacent to the study area, which gives the study area a false relationship to the river in its original context. This, combined with the extensive disturbances within the study area indicates that the aesthetic value has been highly impacted by historical activity. However, the wider landscape which the study area sits within is closely linked with Aboriginal cultural values and provides a context for Aboriginal sites that gives a strong sense of place. The Aboriginal community has also indicated during consultation that this landscape is significant in its proximity to Cooks River, and has therefore been assessed as moderate.

5.6 Statement of significance

The significance of sites was assessed in accordance with the following criteria:

- Requirements of the Code.
- The Burra Charter.
- Guide to Investigating and Reporting on Aboriginal Heritage.

The combined use of these guidelines is widely considered to represent the best practice for assessments of Aboriginal cultural heritage. The identification and assessment of cultural heritage values includes the four values of the Burra Charter: social, historical, scientific and aesthetic values. The resultant statement of significance has been constructed for the study area based on the significance ranking criteria assessed in Table 7.

5.6.1 Statement of significance for the study area

The study area, bounded to the north and east by Cooks River, has undergone extensive landscape modification associated with land reclamation through the diversion of Cooks River and land use as a sewage farm, agriculture and market gardening, and more recently as the Kogarah Golf Course and Motorway Operations Centres. Geotechnical works suggest that there is a minimum of 0.5 metres of fill over all areas of site, with up to 1.8 metres in some areas (Jeffery and Katauskas 2008, p. 5).

As such, any archaeological deposits that may have once been present within the study area have likely been impacted or destroyed. No Aboriginal sites or objects, or favourable landforms were identified during the field investigation. Shell deposits identified on the surface of the study area are considered redeposited shell deposits lacking in the stratigraphy characteristic of cultural middens, contain a variety of shell size and species including those not considered edible, and do not coincide with artefacts, charcoal, or other cultural material. They are therefore not considered traces of cultural middens. Therefore, the study area has been assessed to hold low scientific significance.

The Aboriginal community has indicated during consultation that the general area around the Cooks River has a high significance to the community, particularly to those who trace their ancestry to the region. The study area does not have any direct historical associations and has low historical significance. The study area has been highly disturbed and has reduced aesthetic significance due to these disturbances, however consultation has indicated the wider area around Cooks River has aesthetic significance and therefore it has been assessed as having moderate aesthetic associations.

Table 7 Significance assessment criteria

Site name	Criteria	Ranking
Study area	Cultural – discussions with the local Aboriginal communities reflect that the site is high in value.	High
	Historical – the site is not connected to any historical event or personage.	Low
	Scientific – the site possesses no archaeological values.	Low
	Aesthetic – the site is located next to Cooks River. While it has been impacted by modern development, consultation has indicated it still has some aesthetic significance.	Moderate

6 Development limitations and mitigation measures

Within the study area, there are no recorded Aboriginal sites that may be subject to harm. It is expected that the potential of harm to Aboriginal archaeological sites from the development in the study area ranges from negligible to low (). Strategies to avoid or minimise harm to Aboriginal heritage in the study area are discussed below.

6.1 Potential risks to Aboriginal cultural heritage

The current proposed works within the study area include various activities. If not mitigated the impact may include:

- Concept Masterplan to support the staged delivery of the Kogarah Golf Club Redevelopment, including:
 - Maximum building envelopes, including maximum building heights and minimum building setbacks.
 - Maximum GFA up to 343,250m², comprising:
 - 3,250m² of GFA (FSR of 1.25:1) on Lot 31 DP 1231486.
 - 340,000m² of GFA on Lot 100 DP 1231954.
 - Conceptual primary land uses, including:
 - Block 1 – Mixed-use (i.e. commercial, hotel, serviced apartments, artisan food and drink industry) and advertising structures.
 - Block 2 – Logistics and mixed-use (i.e. commercial, hotel, serviced apartments).
 - Block 3A – Logistics.
 - Block 3B – Logistics.
 - Block 3C – Logistics and Data centre.
 - Urban Design Guidelines to guide future development of the built form and public domain; and
 - Strategies and mitigation measures to manage potential environmental impacts.
- Early Works to support the future delivery of built form and publicly accessible open space, including:
 - Site preparation works, comprising:
 - Demolition of existing structures.
 - Clearing of existing vegetation.
 - Remediation works.
 - Bulk earthworks, including ground improvement and flood mitigation works.
 - Site servicing and infrastructure works, including:
 - Construction of the Flora Street East extension consistent with Item 3 of the executed Voluntary Planning Agreement with Bayside Council.

- Construction of stormwater infrastructure.
- Construction and augmentation of service and utility infrastructure as necessary.
- Construction of a temporary on-grade parking area.

6.2 Ecologically Sustainable Development

One of the primary aims of the NPW Act is the ‘conservation of objects places and features ... of cultural value within the landscape, including ... places, objects and features of significance to Aboriginal people ...’ ((s.2A(1)(b)(i)). The *Operational Policy: Protecting Aboriginal Cultural Heritage (Version 2)* (DECC NSW 2011) provides guidance to proponents in term of Ecologically Sustainable Development (ESD).

ESD has been defined in Part 3, 6. (2) Objective of the Authority of the *Protection of the Environment Administration Act 1991* (NSW). This outlines that the ESD requires the integration of economic and environmental considerations (including cultural heritage) in the decision-making process. Regarding Aboriginal cultural heritage, ESD can be achieved by applying the principle of intergenerational equity and the precautionary principle.

“Intergenerational equity

The principle of intergenerational equity states that the present generation should make every effort to ensure the health, diversity and productivity of the environment – which includes cultural heritage – for the benefit of future generations.

In terms of Aboriginal cultural heritage, intergenerational equity can be considered in terms of the ‘cumulative impacts’ of any proposal to Aboriginal objects and places. For example, if few Aboriginal objects and places remain in a region (because of harm authorised under previous AHIPs), fewer opportunities remain for future generations of Aboriginal people to enjoy the cultural benefits of those Aboriginal objects and places.

Information about the significance of Aboriginal cultural heritage values associated with the Aboriginal objects and places proposed to be harmed will be relevant to the consideration of intergenerational equity and an understanding of the cumulative impacts of a proposal.

Where there is uncertainty, the precautionary principle should also be followed (see below).

The precautionary principle

The precautionary principle states that the lack of full scientific certainty about the threat of harm should not be used as a reason for not taking measures to prevent harm from occurring.

In applying the precautionary principle, decisions should be guided by:

- *a careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment (which includes cultural heritage)*
- *an assessment of the risk-weighted consequences of various options.*

The precautionary principle is relevant to Heritage NSW consideration of potential harm to Aboriginal cultural heritage where:

- *the proposal involves a risk of serious or irreversible harm to Aboriginal objects or places or to the value of those objects or places, and*

- *there is a lot of uncertainty about the significance of Aboriginal cultural heritage values of the Aboriginal objects or places proposed to be harmed.*

Where this is the case, a precautionary approach should be taken and all cost-effective measures implemented to prevent or reduce harm to the Aboriginal objects/place (DECC NSW 2011, p. 26)."

6.3 Management and mitigation measures

Ideally, heritage management involves conservation of sites through the preservation and conservation of fabric and context within a framework of 'doing as much as necessary, as little as possible' (Australia ICOMOS 2013). In cases where conservation is not practical, several options for management are available. For sites, management often involves the salvage of features or artefacts, retrieval of information through excavation or collection (especially where impact cannot be avoided) and interpretation.

As part of the management and mitigation measures for the proposed works, an ACHAR including archaeological survey and consultation with the Aboriginal community was undertaken. This was done to determine the presence and nature of any potential Aboriginal sites so that appropriate management could be undertaken. The survey did not identify the presence of any Aboriginal sites, and the study area was assessed with low potential due to high levels of disturbances present. The bleached shell that was identified across the study area eroding out of fill was observed to lack stratigraphy; was comprised of individuals that would not be considered edible; and included no evidence of cooking or other remains typically seen within middens present. This suggests that the shell may originate from either a redeposited shell midden or a natural deposit, such as one formed by fluvial processes.

Avoidance of impact to archaeological and cultural heritage sites through the design of the development is the primary mitigation and management strategy and should be implemented where practicable. Owing to the history of disturbance associated with fill activities and land reclamation within the study area, geotechnical data indicates that the extant soil profiles within the study area consist of imported fill to a depth of 0.5 to 1.8 metres. If any intact archaeological material were to be present within the study area, it would be located within the interbedded clays and sands underlying the fill. Any proposed works within the study area would therefore be undertaken within areas heavily disturbed by historical land-use and will avoid impacts to any known Aboriginal sites. As such, consultation undertaken has resulted in the following management strategies:

6.3.1 No further archaeological work required

Due to the high disturbance prevalent throughout the recent history of the study area and geotechnical works identifying the presence of fill at depths up to 1.8 metres across the site, the study area has been identified as containing low potential for Aboriginal sites to be present. No further archaeological works are necessary.

6.3.2 Continued consultation with the registered Aboriginal stakeholders

It is recommended that Stockland continue to inform the RAPs about the progress of the study area throughout the life of the project. This recommendation is in keeping with the consultation requirements.

6.3.3 Monitoring during earthworks

The majority if not all of the evidence of past Aboriginal occupation/ Aboriginal history on the site has since been removed, heavily disturbed or buried under deep landfill. While testing was recommended by the

members of Metro LALC who attended the field investigation, the depth of the fill across the site indicates that test excavations would not be effective in this instance. Therefore, in keeping with recommendations from previous assessment Biosis (2023) and consultation it is recommended that monitoring be undertaken by RAPs when excavation past fill layers occurs. This will ensure, that should any Aboriginal archaeology be present it would be identified and properly cared for. This was also supported by RAPs during stage 4 consultation.

6.3.4 Heritage induction and Construction Environmental Management Plan

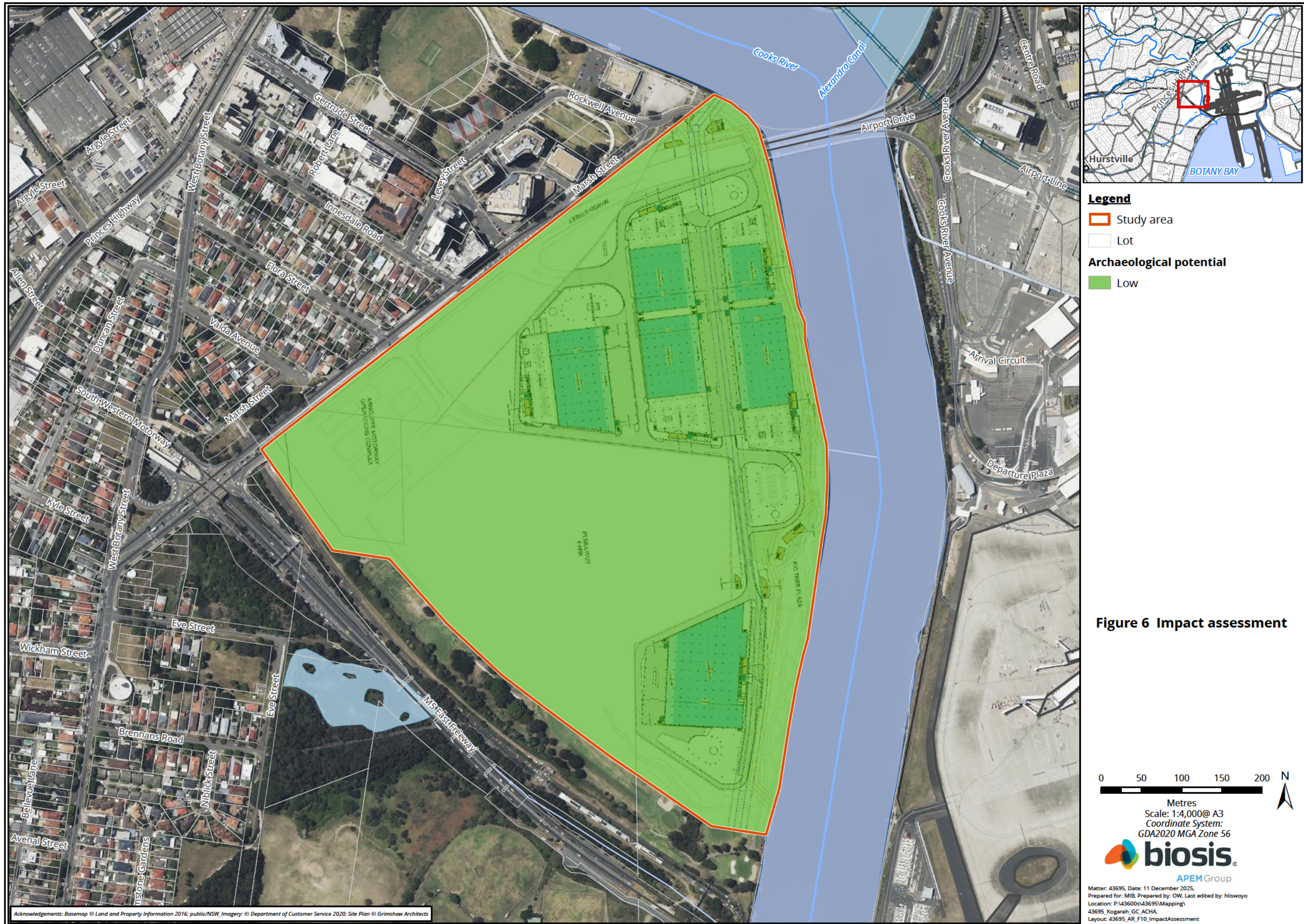
While it has been concluded that the study area has been highly disturbed and contains low archaeological potential, the study area is in a location where middens were likely present. Therefore, a heritage induction should be included in the site induction for all personnel. This will inform as to when works should cease and a manager be contacted for further instruction should any potential Aboriginal sites be identified during groundworks. This includes the following items:

- Relevant legislation.
- Location of identified Aboriginal heritage sites, areas of archaeological potential, and areas of archaeological sensitivity.
- Basic identification skills for Aboriginal and non-Aboriginal artefacts and human remains.
- Procedure to follow in the event of an unexpected heritage item find during construction works.
- Procedure to follow in the event of discovery of human remains during construction works.
- Penalties and non-compliance.

This should be included in the CEMP for the project, which would also outline the methodology for RAP monitoring.

6.3.5 Discovery of unanticipated Aboriginal objects and human remains

An unexpected finds protocol should be developed so that if any Aboriginal objects or human remains are encountered, they are managed appropriately. This can also be incorporated into the CEMP.



7 Recommendations

The recommendations below respond specifically to the wishes of the RAPs. Recommendations regarding the archaeological value of the site, and the subsequent management of Aboriginal cultural heritage is provided in the archaeological report (Appendix 5).

Recommendation 1: Continued consultation with the RAPs

It is recommended that Stockland continue to inform these groups about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project. This recommendation is in keeping with the consultation requirements.

Recommendation 2: No further archaeological works necessary

Due to the high disturbance prevalent throughout the recent history of the study area and geotechnical works identifying the presence of fill at depths up to 1.8 metres across the site, the study area has been identified as containing low potential for Aboriginal sites to be present. No further archaeological works are necessary.

Recommendation 3: Monitoring during earthworks

The majority if not all of the evidence of past Aboriginal occupation/ Aboriginal history on the site has since been removed, heavily disturbed or buried under deep landfill. While testing was recommended by the members of the LALC who attended the field investigation, the depth of the fill across the site indicates that test excavations would not be effective in this instance. Therefore, in keeping with recommendations from previous assessment and consultation Biosis (2023) it is recommended that monitoring be undertaken by RAPs when excavation past fill layers occurs. This will ensure, that should any Aboriginal archaeology be present it would be identified and properly cared for and was supported by RAPs during Stage 4 consultation.

Recommendation 4: Heritage induction and Construction Environmental Management Plan

While it has been concluded that the study area has been highly disturbed and contains low archaeological potential, the study area is in a location where middens were likely present. Therefore, a heritage induction should be included in the site induction for all personnel. This will inform as to when works should cease and a manager be contacted for further instruction should any potential Aboriginal sites be identified during groundworks. This includes the following items:

- Relevant legislation.
- Location of identified Aboriginal heritage sites, areas of archaeological potential, and areas of archaeological sensitivity.
- Basic identification skills for Aboriginal and non-Aboriginal artefacts and human remains.
- Procedure to follow in the event of an unexpected heritage item find during construction works.
- Procedure to follow in the event of discovery of human remains during construction works.
- Penalties and non-compliance.

This should be included in the CEMP for the project, which would also outline the methodology for RAP monitoring (Recommendation 3).

Recommendation 5: Discovery of unanticipated Aboriginal objects

All Aboriginal objects and Places are protected under the NSW NPW Act. It is an offence to knowingly disturb an Aboriginal site without a consent permit issued by Heritage NSW. Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying Heritage NSW and Aboriginal stakeholders.

Recommendation 6: Discovery of human remains

If any suspected human remains are discovered during any activity works, all activity in the vicinity must cease immediately. The remains must be left in place and protected from harm or damage. The following contingency plan describes the immediate actions that must be taken in instances where human remains or suspected human remains are discovered. Any such discovery at the study area must follow these steps:

1. **Discovery:** If suspected human remains are discovered all activity in the vicinity must stop to ensure minimal damage is caused to the remains; and the remains must be left in place and protected from harm or damage.
2. **Notification:** Once suspected human skeletal remains have been found, the Coroner's Office and the NSW Police must be notified immediately. Following this, the find will be reported to the Aboriginal parties and Heritage NSW.

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Appendices

Appendix 1 Consultation log

Stage 1: Notification of project proposal and registration of interest

Step 1: Identification of Aboriginal people/parties with an interest in the proposed study area.

Organisation contacted	Date and type of contact	Date and type of response	Response details
Heritage NSW	17/10/2025 email	20/10/2025 email	Provided Aboriginal Stakeholder List
Native Title Services CORP Limited	17/10/2025 email	17/10/2025	Confirmed no Native Title Claimants
Office of the Registrar, Department of Aboriginal Affairs	17/10/2025 email	17/10/2025 email	Confirmed no Registered Aboriginal Owners in the area, recommended Biosis contact Metro LALC
Greater Sydney Local Land Services	17/10/2025 email	17/10/2025 email	Recommended Biosis contact Heritage NSW
National Native Title Tribunal	17/10/2025 email	17/10/2025 email 17/10/2025 email	Forwarded email to the geospatial team Confirmed no Aboriginal Owners
Bayside Council	17/10/2025 email	17/10/2025 email	Automatic email
Metropolitan Local Aboriginal Land Council	17/10/2025 email	17/10/2025 email	Automatic email

Step 2: Public advertisement

The public notice was published in the *Illawarra Mercury* on 20 October 2025. A copy of the advertisement is provided in Appendix 2.

Step 3: Registration of interest

The registration period ran from the 3 to 16 November 2025. Leeway was given to Aboriginal parties/groups who provided responses shortly after the close of this period and they have been registered as Aboriginal parties for consultation.

Organisation contacted	Date and type of contact	Date and type of response	Response details
A1 Indigenous Services	3/11/2025 email	3/11/2025 email	Registered interest
Amanda Hickey Cultural Services	3/11/2025 email	-	-
Aragung Aboriginal Cultural Heritage Site Assessments	3/11/2025 email	-	-
B.H. Heritage Consultants	3/11/2025 email	9/11/2025 email	Registered interest

Organisation contacted	Date and type of contact	Date and type of response	Response details
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	10/11/2025 email	Registered interest
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	3/11/2025 email	Registered interest
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	5/11/2025 email	Registered interest
[REDACTED]	3/11/2025 email	4/11/2025 email	Registered interest
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	4/11/2025 email	Registered interest
[REDACTED]	3/11/2025 email	-	-

Organisation contacted	Date and type of contact	Date and type of response	Response details
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	3/11/2025 email	Registered interest
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
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[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	11/11/2025 email	Registered interest
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-

Organisation contacted	Date and type of contact	Date and type of response	Response details
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	-	-
[REDACTED]	3/11/2025 email	3/11/2025 email	Registered interest
[REDACTED]	3/11/2025 email	3/11/2025 email	Registered interest

Stage 2: Presentation of information about the proposed project and Stage 3: Gathering information about cultural significance

Step 1: Provision of project information pack and project methodology pack and

A copy of the information pack is provided in Appendix 3 and a copy of the covering email is provided following.

Organisation contacted	No.	Date and type of contact	Date and type of response	Response details
[REDACTED]	1	17/11/2025 email	-	-
[REDACTED]	2	17/11/2025 email	-	-
[REDACTED]	3	17/11/2025 email	18/11/2025 phone call	Rang to get more of an idea about existing disturbances and raised the significance of the landscape being in proximity to Cooks River based on his families relationship to the area. Paul acknowledged the historical impacts would have been significant but noted other instances where sites had been recorded on golf courses.
			22/11/2025 email	Agreed with the methodology and expressed interest in any fieldwork
[REDACTED]	4	17/11/2025 email	-	-
[REDACTED]	5	17/11/2025 email	-	-
[REDACTED]	6	17/11/2025 email	1/12/2025	Thank you for sending over the detailed methodology for the Kogarah Golf Course Redevelopment Stage 2/3. We agree with and support your proposed methodology. We believe it is crucial to investigate further and conduct a comprehensive field survey to ensure thorough assessment. We look forward to working alongside you on this project.

Organisation contacted	No.	Date and type of contact	Date and type of response	Response details
[REDACTED]	7	17/11/2025 email	-	-
[REDACTED]	8	17/11/2025 email	-	-
[REDACTED]	9	17/11/2025 email	-	-
[REDACTED]	10	17/11/2025 email	-	-
[REDACTED]	11	17/11/2025 email	-	-

Step 2: Field survey

Organisation contacted	Date and type of contact	Date and type of response
[REDACTED]	14/11/2025 email	8/12/2025 in person
Onsite conversations		
[REDACTED]		
- That the propensity of the shell across the site was a strong indication of the high significance of the site, but acknowledged the heavy disturbances that have led to the spread the shell across the site. Both acknowledged that no cultural midden origin could be identified. This raised concerns about the scale of “unknowns” within the study area and so recommended that test excavations be undertaken to locate the cultural midden origins prior to works taking place. - Recommended that monitoring be undertaken during subsequent works. - Visited the client’s suggested midden site and reiterated the above comments. - Identified comparative case studies to support observations made on site, including: - Current Timbrell Park investigations that are concerned with a large shell deposit - Warratah Park where a large sandstone escarpment was identified as a significant landform for cultural material during subsurface investigations. It was noted that the site had appeared similar to KGC on the surface and that sandstone was observed within at least one exposure at KGC. - Recommended that cultural awareness training and a Connecting with Country plan be implemented.		

Stage 4: Review of draft report

RAPs were provided with copies of the draft ACHA and AR on 20 February 2026. Closure of this stage of consultation was on 20 March 2026. A copy of the correspondence from this stage is provided in Appendix 4.

Organisation contacted	No.	Date and type of contact	Date and type of response	Response details
[REDACTED]	1	20/02/2026 email 13/03/2026 Reminder email	13/03/2026 email	I have carefully reviewed both documents and fully support the findings and information presented in the assessment.

Organisation contacted	No.	Date and type of contact	Date and type of response	Response details
				<i>A1 Indigenous Services also requested that their email is not published.</i>
	2	20/02/2026 email 13/03/2026 Reminder email	-	-
	3	20/02/2026 email 13/03/2026 Reminder email	27/02/2026 email	Kindly noted  Indigenous sites Specialist.
	4	20/02/2026 email 13/03/2026 Reminder email	-	-
	5	20/02/2026 email 13/03/2026 Reminder email	-	-
	6	20/02/2026 email	10/03/2026 email	Thank you for Draft ACHAR & AR for Kogarah Golf Club Redevelopment, we would like to agree and support your recommendations & agree that if testing cannot be done that monitoring is done during earthworks. We look forward to working alongside you on this project. <i>**reminder email not sent as response had been provided</i>
	7	20/02/2026 email 13/03/2026 Reminder email	-	-
	8	20/02/2026 email 13/03/2026 Reminder email	-	-
	9	20/02/2026 email 13/03/2026 Reminder email	-	-
	10	20/02/2026 email 13/03/2026 Reminder email	-	-
	11	20/02/2026 email	-	-

Organisation contacted	No.	Date and type of contact	Date and type of response	Response details
		13/03/2026 Reminder email		

Appendix 2 Stage 1: Notification of project proposal and registration of interest

Appendix 3 Stage 2: Presentation of information about the proposed project and Stage 3: Gathering information about cultural significance

Appendix 4 Stage 4: Review of draft cultural heritage assessment report

Appendix 5 Archaeological report

