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23 September 2025

Chris Thompson
Senior Development Manager
Homes NSW

Dear Chris

Re: Aboriginal Heritage Due Diligence Report – 2 Flide Street, Caringbah

This Aboriginal Heritage Due Diligence Report has been prepared by Artefact Heritage and Environment Pty Ltd (Artefact Heritage) on behalf of Homes NSW for a concurrent State Significant Development Application (SSD-84862461) and Planning Proposal for the redevelopment of existing social housing (the Project) at 2 Flide Street, Caringbah (the Study area). The project involves the construction of two residential flat buildings—one rising to part 13 and part 14 storeys, and the other to 8 storeys—comprising a total of 164 social and affordable housing apartments. The development also includes a communal room and a two-level basement car park.

This report has been prepared in accordance with the principles of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water [DECCW] 2010a), hereafter the Due Diligence Code of Practice. The purpose of this Aboriginal Heritage Due Diligence Report is to determine if Aboriginal objects are present, or are likely to be present, within the study area and to address the Secretary's Environmental Assessment Requirements (SEARs) to the Project issued on 6 June 2025. Item 21 of the SEARs stipulates that an initial assessment of the potential impacts to Aboriginal heritage be completed (See Table 1).

This report has been prepared by Katherine Douglas (Graduate Heritage Consultant, Artefact Heritage) and Sammuel Sammut (Senior Heritage Consultant, Artefact Heritage) and with management input and review provided by Ryan Taddeucci (Principal, Artefact Heritage).

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

Yours Sincerely

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1.0 INTRODUCTION

1.1 Description of the study area

The Study area is located within the Sutherland Shire local government area (LGA) and within the boundaries of the La Perouse Local Aboriginal Land Council (LALC). 2 Flide Street, Caringbah (Lots 57, 58, 59, 60 and 80 DP8147) has a total area of approximately 3,596 square metres (sqm) and is bound by Flide Street to the north, Gardere Street to the west, Willawong Road to the east and the rail corridor for the T4 Eastern Suburbs & Illawarra Line to the south. Refer to Figure 1. The site is accessible by public transport, being within 400m of the entrance to Caringbah Station and bust stops on the Kingsway which have frequent services to Sutherland, Miranda and Cronulla.

2 Flide Street, Caringbah currently comprises 38 social housing units within two 3 storey buildings with a single level basement car park.

1.2 Proposed works

The proposed development comprises the construction of two residential flat buildings—one rising to part 13 and part 14 storeys, and the other to 8 storeys—comprising a total of 164 social and affordable housing apartments. The development also includes a communal room and a two-level basement car park. The proposal includes bulk earthworks, tree removal and associated landscaping and public domain works.

To support the Proposal, a concurrent Planning Proposal seeks amendments to the development standards within SSLEP as follows:

- Building Height – Increase the maximum building height development standard from 16m to 50m; and
- FSR – Increase the maximum FSR development standard from 1.2:1 to 4:1.

The existing buildings on the Site were approved for demolition under Division 5.1 of the *Environmental Planning and Assessment Act 1979*, and does not form part of this proposal. This included removal of all trees on top of the existing basement.

1.3 Statutory framework

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

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

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

The Minister may, by order published in the Gazette, declare any place specified or described in the order, being a place that, in the opinion of the Minister, is or

was of special significance with respect to Aboriginal culture, to be an Aboriginal place for the purposes of this Act.

The Secretary's Environmental Assessment Requirements (SEARs) were issued 3 June 2025. Item 21 on the industry SEARs for in-fill housing, stipulates that an initial assessment of the potential impacts to Aboriginal heritage be completed (Table 1). To address item 21 on the industry specific Housing SEARs, the standards of the Due Diligence Code of Practice have been adapted to inform the initial assessment (this Due Diligence) of the likely impacts of the proposed works on Aboriginal heritage. If it is found through the Due Diligence process that Aboriginal heritage will or is likely to be harmed, then further investigation and an impact assessment will be required to prepare information about the types of objects and the nature of the harm. Therefore, this Due Diligence will determine if additional assessment in the form of an Aboriginal Cultural Heritage Assessment Report (ACHAR) is required.

Table 1: Item 21 of Housing SEARs

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

Figure 1: Study Area



2.0 DESKTOP ASSESSMENT

2.1 Aboriginal Heritage Information Management System (AHIMS) search

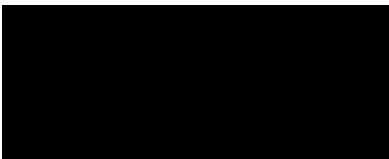
NOTE: The location of Aboriginal sites is considered culturally sensitive information. It is advised that this information, including the AHIMS data appearing on the heritage map for the proposal be removed from this report if it is to enter the public domain.

A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client ID: 992743) was completed on 4 April 2025 for a search area measuring approximately 3km by 2km surrounding the study area (Figure 2). The parameters of this search were:

GDA 1994 MGA 56

Buffer

Number of sites



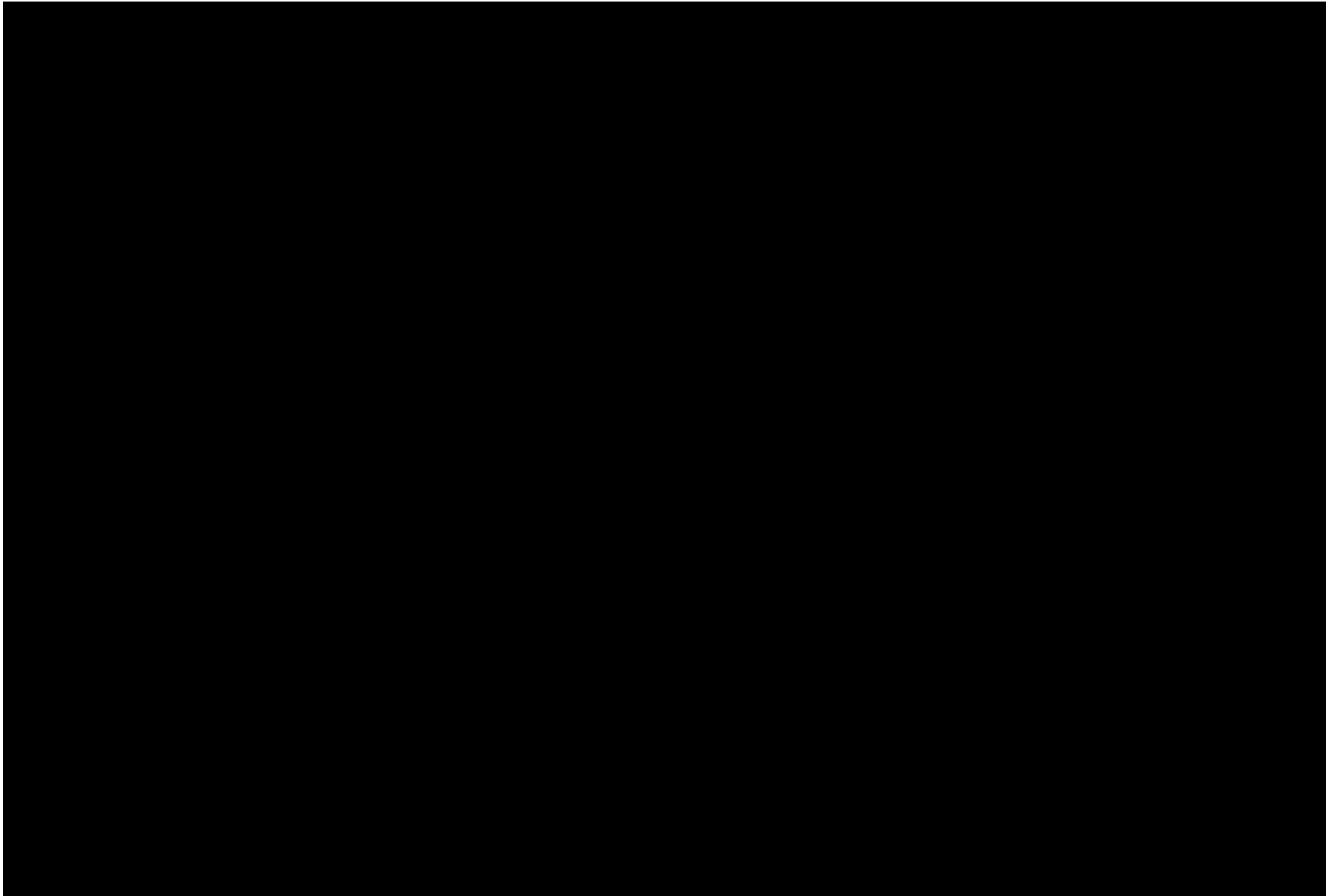
A total of four registered Aboriginal sites were identified within the search area. There are no registered Aboriginal sites within the study area. The closest AHIMS site identified in the search is AHIMS 52-3-0109, a 'Shell, Artefact' located approximately 850 m southwest of the study area.

The four AHIMS site are clustered within 100 metres of the shore of the Port Hacking River which at its closest point is approximately 750 metres southwest of the study area. The quantity of registered AHIMS sites within the search area is too low to make meaningful interpretations of site distributions.

Table 2: Frequency of site features in AHIMS search results

Site Types	Frequency	Percentage
Potential Archaeological Deposit (PAD)	3	75%
Shell, Artefact	1	25%
Total	4	100

Figure 2: AHIMS extensive search



2.2 Landscape features that indicate the presence of Aboriginal object

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.

2.2.1 Hydrology and landform

The study area is located on a slope that grades downwards to the south (Figure 3). The slope has been heavily modified by development within the area, which include the construction of residences, roadways and a train line. The closest watercourse to the study area is Kareena Creek, a potentially modified creek, which is located approximately 530m southwest of the study area.

2.2.2 Historic land disturbance

Analysis of historic aerial imagery demonstrates that multiple phases of development have occurred within the study area. The study area remains mostly undeveloped by 1943 (Figure 4), except for some structures towards its southeast boundary. However, by 1956 (Figure 5), multiple houses had been constructed across the study area, and it appears that little land remained undisturbed. By 1990 (Figure 6), the structures that are currently extant in the study area had been constructed, with all the former houses being demolished. This cycle of construction, demolition and then redevelopment is likely to have significantly disturbed the study area and limits the potential for Aboriginal objects to be present.

Figure 3: Topography and Hydrology of the study area

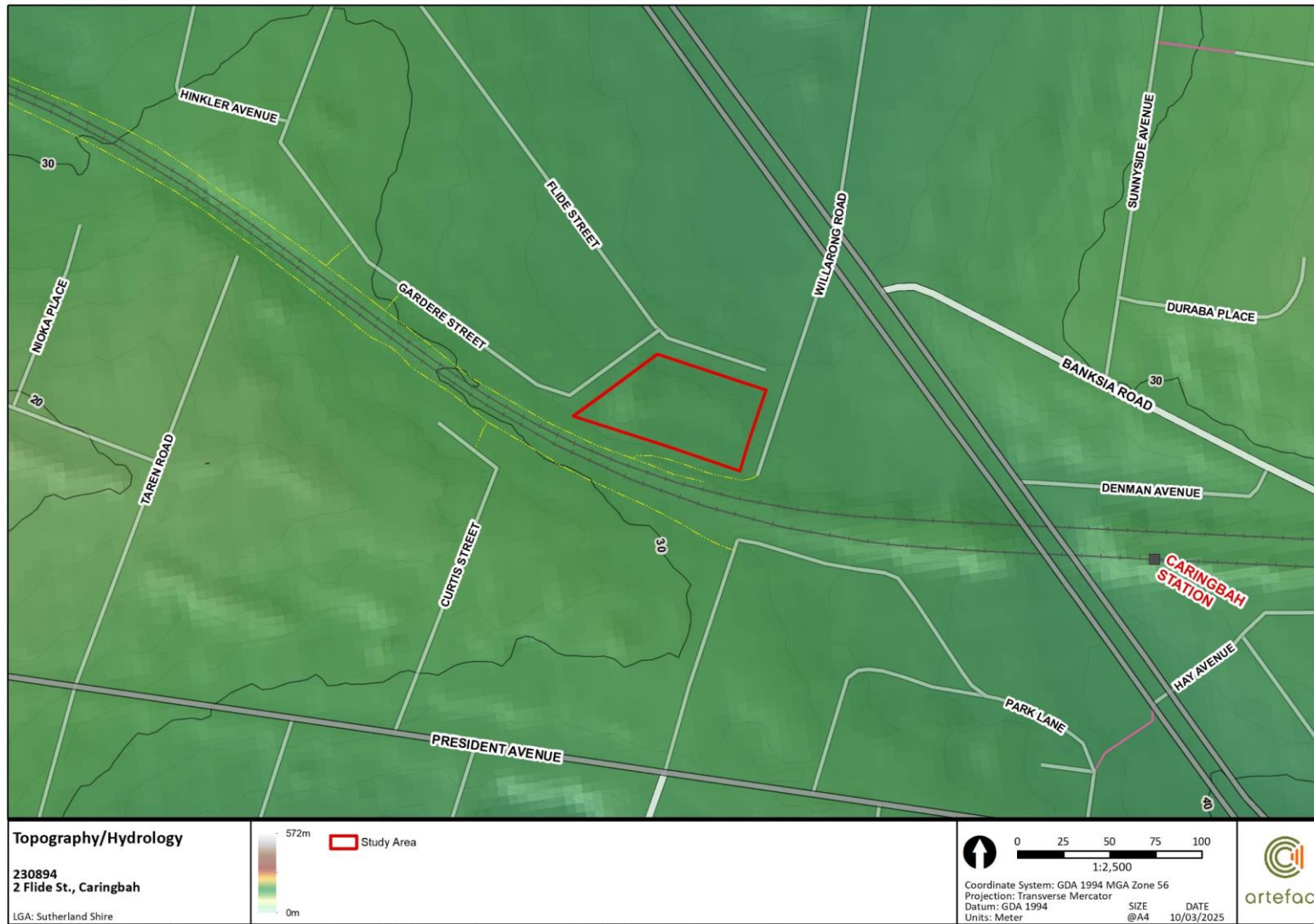


Figure 4: 1943 aerial photograph



Figure 5: 1956 aerial photograph

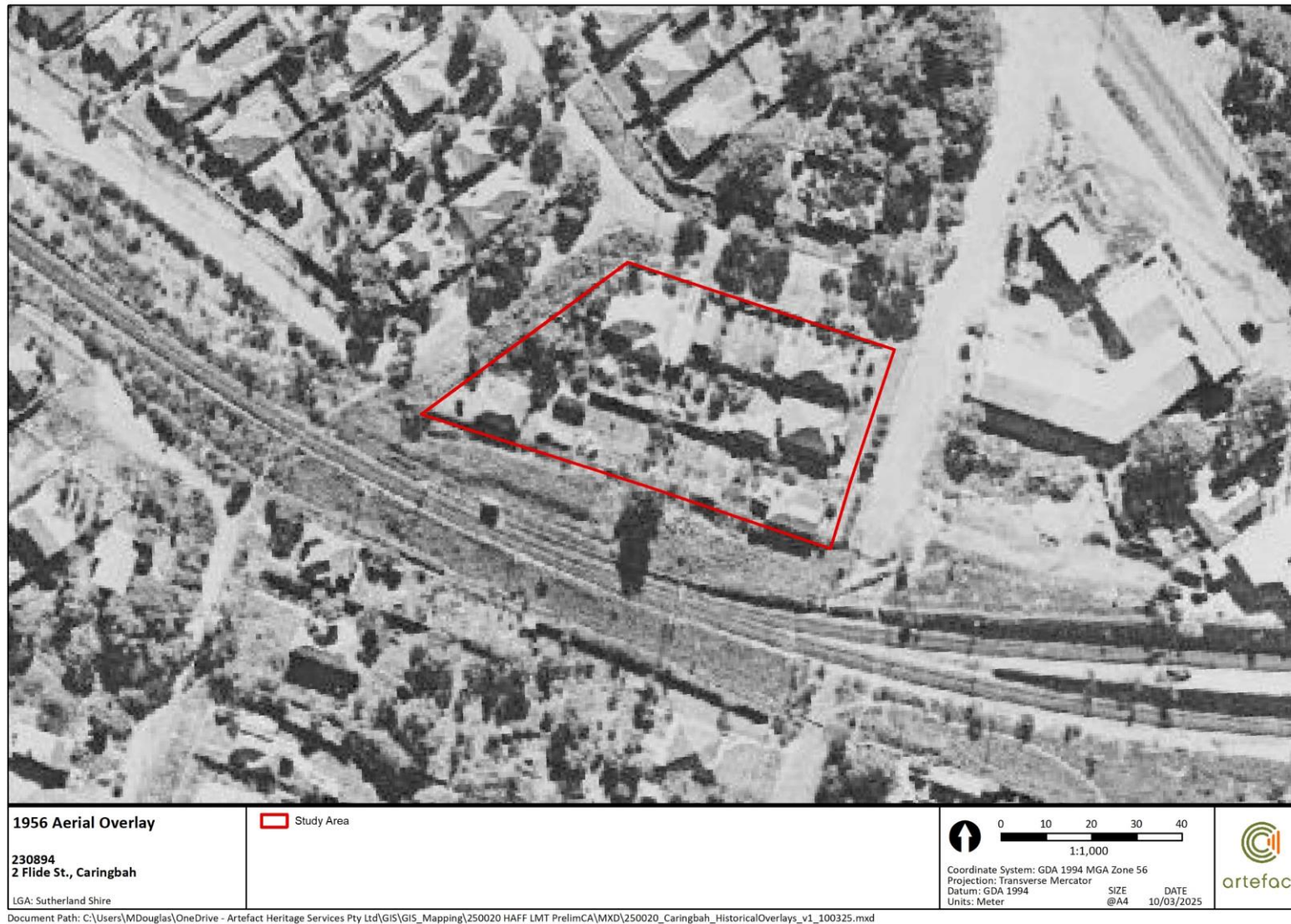


Figure 6: 1990 aerial photograph



3.0 VISUAL INSPECTION

A visual inspection of the study area was undertaken by Sammuel Sammut (Senior Heritage Consultant, Artefact Heritage) and Katherine Douglas (Graduate Heritage Consultant, Artefact Heritage) on 25 March 2025. Conditions were cloudy with light rain but were acceptable for the visual inspection.

Excavation for an underground carpark under the extent of the property has removed the potential for any natural soils or artefacts to be present (Figure 7). There was nil ground exposure on the northwestern boundary of the terrace buildings where the entrance to the underground carpark is located (Figure 6).

The study area is significantly disturbed and shows evidence of removal of potential artefact bearing residual soils from terracing and cuts into the natural slope for the construction of retaining walls and the extant buildings set into the landscape.

Overall, ground visibility and exposure were very low, being nil in most areas due to concrete paving (Figure 10), grass and vegetation cover in the form of landscaped gardening (Figure 12 and Figure 15). Patches of ground visibility were identified within grassed areas, where imported garden soil was observed (Figure 8). No original vegetation was observed (Figure 11). Across the study area services location markings indicate significant subsurface services that impact the integrity of the soil profiles (Figure 13).

Historical aerial images of the study area indicate construction which is consistent with the results of the archaeological survey. The lot has undergone stages of land clearing, demolition of structures visible in 1956 (Figure 5) and construction of the current extant property prior to 1990 (Figure 6).

It is unlikely that Aboriginal objects are present in the study area.

Figure 7: View east of property entrance with underground parking cut into the landscape. Figure 8: View east to the side of the property entrance and subsurface works indicated



Figure 9: View of cementing on southeast boundary of the study area



Figure 10: Terracing of the study area, the garden and landscaping is elevated above the foundation of the extant buildings



Figure 11: Introduced landscaping at the northeast of the property.



Figure 12: North access of the property with cement paving and vents to the underground carpark visible.



Figure 13: View of services location markings indicating extensive underground impacts to the study area



Figure 14: View of openings to carpark under each structure of the study area



Figure 15: View of landscaped gardening and landscape terracing



4.0 SUMMARY

4.1 Outcome of desktop assessment and visual inspection

The study area is not situated within any of the landscape features described by the Due Diligence Code of Practice as often being associated with Aboriginal objects. Additionally, no Aboriginal objects were identified within the study area during the visual inspection.

The modification of the study area which involve terracing, cut and fill into the slope, demolition of preexisting structures and current extant development including underground carpark which indicates extensive ground disturbance. In addition, visual inspection noted markers of subsurface works across the study area. As a result of this disturbance, it is unlikely that Aboriginal objects will be present in the study area.

Landscape Feature	Presence in study area
Within 200m of water	No. The closest water source is Kareena Creek which is approximately 530m away.
Located within a sand dune system	No. no sand dune is located within or surrounding the study area.
Located on a ridge top, ridge line, or headland	No. the study area is not located on a ridge top, ridge line or headland.
Located within 200m below of a cliff face	No. The study area is not located within 200m of a cliff face
Within 20m of or in a cave, rock shelter, or cave mouth (Environment 2010)	No. No caves, rock shelters, or cave mouths are known to exist within 20m of the study area.
Is on 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.	Yes. The study area signs clear observable evidence of modification from historic construction of structures.

4.2 Outcome of Due Diligence

The Due Diligence Code of Practice provides a series of questions that must be answered to determine the outcome of the due diligence process. These questions are addressed in Table 3.

Table 3: Due Diligence questions and responses

Question	Answer	Comment
Will the activity disturb the ground surface or any culturally modified trees	Yes	The works include construction of two residential flat buildings.
Are there any: - Confirmed AHIMS records - Other sources of information - Landscape features	No	There are no AHIMS sites registered within the project area. Due to observable disturbance which has modified the natural landform, there are no identified landscape features associated with Aboriginal objects within the study area. No additional sources of information are known to indicate that Aboriginal objects are likely to be present in the study area.
Can harm to Aboriginal objects be avoided	Yes	No Aboriginal objects are likely to be present within the study area. Therefore, harm to Aboriginal objects is unlikely.
Does a desktop assessment and visual inspection confirm the presence of Aboriginal objects, or that they are likely to be there	No	The desktop assessment and visual inspection indicates that the study area has been subject to significant levels of disturbance. It is considered unlikely that Aboriginal objects are present within the study area.
Is further assessment required	No	Works may proceed with caution. Aboriginal objects encountered as unexpected finds remain protected under the <i>National Parks and Wildlife Act 1974</i> . Where Aboriginal objects are encountered archaeological assessment will be required.

5.0 CONCLUSION

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

- Statutory requirements under the *National Parks and Wildlife Act 1974* as amended
- 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 study area has been subject to significant disturbance
- No Aboriginal objects were observed on the ground surface
- No area of archaeological sensitivity have been identified in the study area

The following recommendations are therefore made:

- The study area does not contain and is not likely to contain any Aboriginal objects. It is recommended that no further Aboriginal heritage assessment or investigation is required. Therefore, the preparation of an ACHAR is not required, and the proposed works can proceed with caution subject to the stop-work procedure identified below.
- It is advised that this Due Diligence does not constitute consent to harm Aboriginal objects, nor it is a 'site clearance' mechanism to allow activities to occur in an area where Aboriginal objects are likely or known to be present. If Aboriginal objects are discovered during the proposed works, works must stop immediately, and an assessment must be undertaken in accordance with Part 6 of the *National Parks and Wildlife Act 1974*. It is recommended that a stop-work procedure be developed to allow proper assessment and management of any unexpected Aboriginal objects. A sufficiently experienced and qualified archaeologist should be engaged immediately to address the unexpected find and advise of further actions.

6.0 References

Department of Environment, Climate Change & Water. 2010. 'Due Diligence Code of Practice for Archaeological Investigations of Aboriginal Objects in New South Wales'.

APPENDIX A: AHIMS EXTENSIVE SEARCH

