

# **240–244 Beecroft Road, Epping**

## **Heritage Impact Statement**

Report prepared for Landcom

June 2018



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## Report Register



The following report register documents the development and issue of the report entitled 240–244 Beecroft Road, Epping—Heritage Impact Assessment, undertaken by GML Heritage Pty Ltd in accordance with its quality management system.

Job No.	Issue No.	Notes/Description	Issue Date
17-0415	1	Draft Report	20 November 2017
17-0451	2	Final report	19 June 2018

## Quality Assurance

GML Heritage Pty Ltd operates under a quality management system which has been certified as complying with the Australian/New Zealand Standard for quality management systems AS/NZS ISO 9001:2008.

The report has been reviewed and approved for issue in accordance with the GML quality assurance policy and procedures.

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## 1.0 Introduction

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### 1.1 Project Background

GML Heritage Pty Ltd (GML) has been engaged by Landcom to provide heritage advice and prepare a Heritage Impact Statement for the proposed redevelopment of the site at 240–244 Beecroft Road, Epping (hereafter referred to as ‘the site’, ‘study area’ or ‘the subject site’). The proposed development is for the Concept Approval and Stage One works of the State Significant Development Proposal SSD 8784.

The subject site was acquired in 2012 by Transport for NSW to deliver Sydney Metro Northwest (previously known as the Northwest Rail Link). Part of the site is currently used as a construction site for the Sydney Metro Northwest tunnel and the remainder of the site is used as a rail operations services facility (Epping Services Facility).

The site was formerly located within the Hornsby local government area (LGA). On 12 May 2016, part of the Hornsby LGA, including the site, was amalgamated into the new City of Parramatta Council. The site is now located within the Parramatta LGA. However, GML Heritage has been advised by UrbanGrowth that the planning controls in the *Hornsby Local Environmental Plan 2013* (HLEP 2013) still apply to the site.

The site is considered to be applicable to the State Significant Development planning pathway, under Clause 19(2), Schedule 1 of the *State and Regional Development State Environmental Planning Policy 2011* (SEPP 2011). The Secretary’s Environmental Assessment Requirements (SEARS) were issued by the Minister of Planning on 24 October 2017 and included the requirement that the application:

*address the impacts of the proposal on any heritage significance on the site and adjacent areas, including heritage items, places or relics significant to Aboriginal or European culture or history.*

This report has been prepared as a stand-alone document in response to the above requirements. It evaluates the study area’s potential to contain archaeological resources—both Aboriginal and historical—and identifies potential development impacts on those predicted resources. It further identifies the heritage significance of the site and heritage items in the vicinity of the study area, and assesses the potential impacts of the proposed development on those heritage items.

### 1.2 Site Location

The location and extent of the site and study area is shown in Figure 1.1 and Figure 1.2.

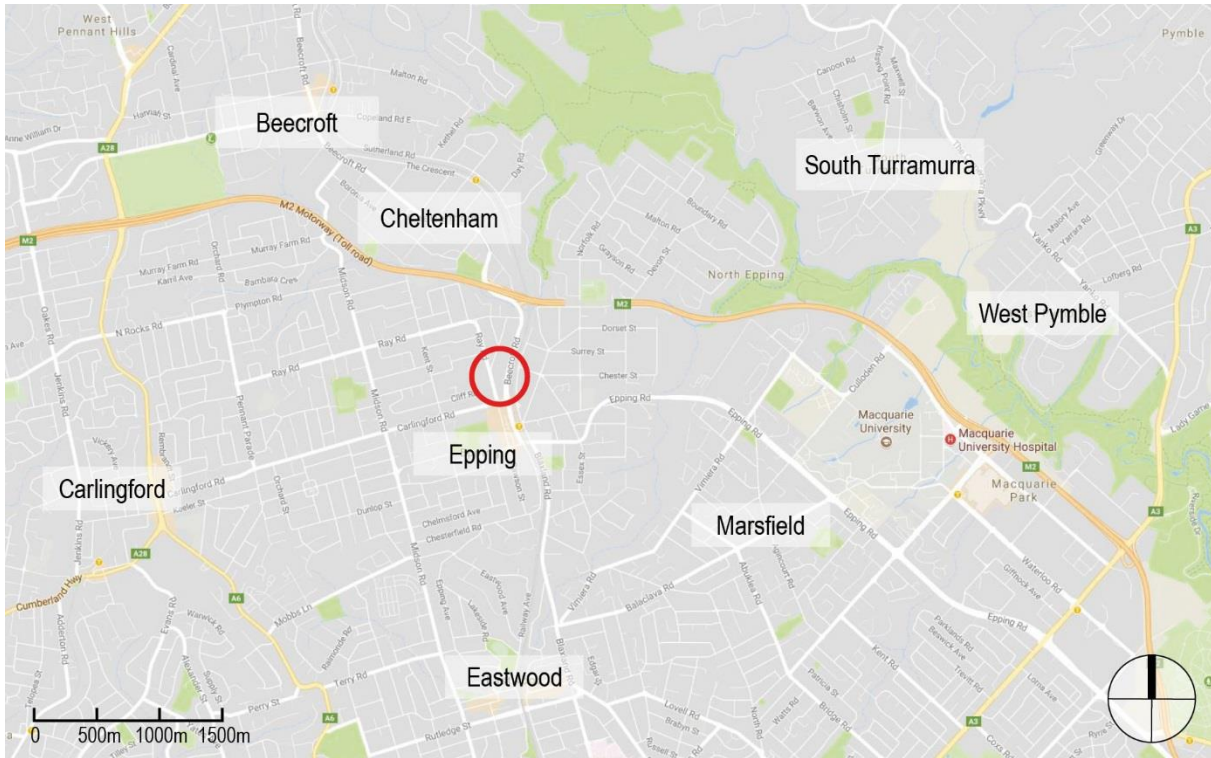
The subject site is identified as Lot 22 of Deposited Plan 1180959. The site has an area of approximately 1.33ha. It is located in the suburb of Epping, approximately 400m north of Epping Railway Station. The site extends from Beecroft Road to the east and Ray Road to the west. The site is approximately 100m north of the intersection of Beecroft Road, Ray Road and Carlingford Road.

Surrounding development consists of a petrol station located immediately to the south of the site, bordering Ray Road, Carlingford Road, Beecroft Road, two–four-storey residential flat buildings to the north and west along Ray Road, and the main northern railway line to the east. A road reserve with remnant bushland is located directly adjacent to the site to the north. The North West Metro Line runs under the site.

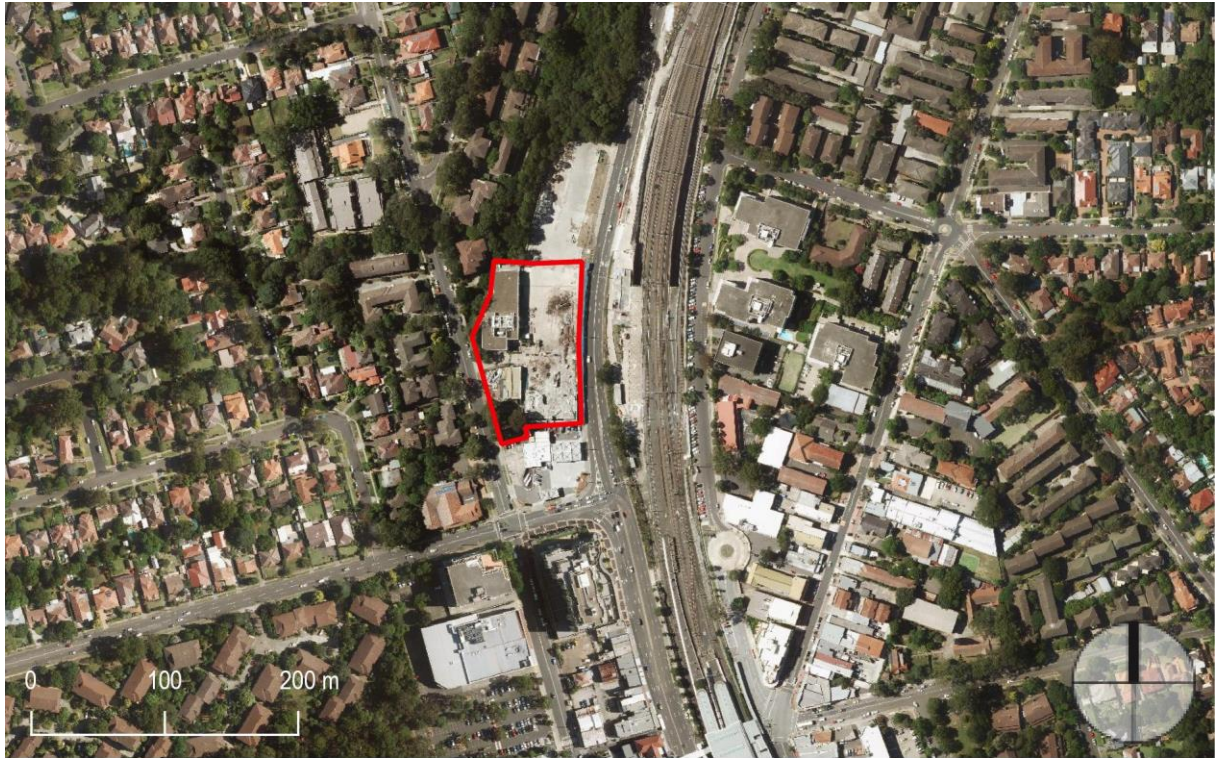
The site is located adjacent to the Epping Town Centre Urban Activation Precinct, and the area is undergoing rapid transformation, with a number of multistorey residential developments up to 22 storeys high being constructed on the eastern side of the railway line.

The site is zoned R4 (High Density Residential) within the HLEP, with a maximum height limit of 48m.

Further details of the current conditions of the site are discussed in Section 3.0 of this report.



**Figure 1.1** Approximate location of the study area. (Source: Google Maps with GML overlay, 2017)



**Figure 1.2** The subject site highlighted in red in its local context. (Source: Google Earth with GML overlay, 2017)

### 1.3 Proposed Development

Landcom is seeking approval of the Concept Proposal and Stage One works for a State Significant Development comprising approximately 442 dwellings and the subdivision of the allotment into two lots, at 240–244 Beecroft Road, Epping.

The proposed development meets the criteria for State Significant Development under the SEPP 2011 in size and capital investment value of over \$30 million.

The current proposal is described as:

- **Concept Proposal** for the site comprising:
  - Building envelope with a maximum height up to RL 48m.
  - Residential yield of approximately 442 dwellings (including a minimum of 5% affordable housing units).
  - Maximum residential gross floor area (GFA) of around 39,000m<sup>2</sup>.
  - Car parking for approximately 356 spaces within the basement.
  - Loading, vehicular and pedestrian access arrangements.
- **Stage 1 Application** for the sub division of the site into two lots for the Epping Service Facility and the proposed residential flat building development and sub-stratum over the rail corridor.

The proposed development is discussed in further detail in Section 4.0 of this report.

## 1.4 Report Aims

### 1.4.1 Archaeological Assessment Aims

The aims of the archaeological assessment component of this report are to:

- investigate readily available historical research to understand the site's development history;
- identify whether the study area has Aboriginal and/or historical archaeological potential;
- identify potential development impacts on the site's identified archaeological resource;
- identify appropriate mitigation measures for the management of the development impacts; and
- prepare a stand-alone report suitable for submission to relevant statutory authorities.

### 1.4.2 Built Heritage Assessment Aims

The aims of the built heritage assessment component of this report are to:

- identify the heritage significance of the site and any heritage items in its vicinity;
- identify any heritage impacts of proposed development on the listed items;
- provide a brief outline of the provisions in the *Hornsby Development Control Plan 2013* which relate to development in the vicinity of heritage items; and
- identify any appropriate mitigation measures for any identified impacts on heritage items.

## 1.5 Limitations

This report provides an assessment of Aboriginal and historical archaeological resources within the study area.

This report provides overarching management recommendations regarding archaeological potential and other heritage values associated with the site. The management recommendations respond to statutory requirements under the *Heritage Act 1977* (NSW) (Heritage Act) and the *National Parks and Wildlife Act 1974* (NSW) (NPW Act), as well as best practice approaches to managing heritage values, including intangible values. This report does not replace the need to prepare any development specific heritage reports that may be required as part of the future development program.

As this report was prepared in accordance with OEH's Due Diligence guidelines, it does not include a formal systematic archaeological survey or an assessment of Aboriginal cultural heritage significance.

This report does not include consultation with the Aboriginal community, as it is not required by the due diligence process.

## 1.6 Statutory Context

This section discusses the state and local statutory planning context as it relates to heritage and potential archaeological resources (both Aboriginal and historical) of the site. In NSW, items of heritage significance and archaeological remains (referred to as 'objects' or 'relics') are afforded statutory protection under the following Acts:

- *National Parks and Wildlife Act 1974* (NSW) (NPW Act);

- *Heritage Act 1977* (NSW) (Heritage Act); and
- *Environmental Planning and Assessment Act 1979* (NSW) (EPA Act).

### 1.6.1 National Parks and Wildlife Act 1974 (NSW)

The NPW Act provides statutory protection for all Aboriginal 'objects' (consisting of any material evidence of the Indigenous occupation of New South Wales) under Section 90 of the NPW Act, and for 'Aboriginal places' (areas of cultural significance to the Aboriginal community) under Section 84 of the NPW Act. Aboriginal objects and places are afforded automatic statutory protection in New South Wales whereby it is an offence (without the Minister for Environment's consent) to harm an Aboriginal object or declared Aboriginal Place.

The NPW Act defines an Aboriginal object as:

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

The protection provided to Aboriginal objects and places applies irrespective of the level of their significance or issues of land tenure. Sites of traditional significance that do not necessarily contain material remains may be gazetted as 'Aboriginal Places' and thereby be protected under the NPW Act. However, areas are only gazetted if the Minister is satisfied that sufficient evidence exists to demonstrate that the location was and/or is of special significance to Aboriginal culture.

A strict liability offence applies for harm to or desecration of an Aboriginal object or declared Aboriginal Place.<sup>1</sup> The definition of 'harm' includes destroying, defacing, damaging or moving an Aboriginal object or declared Aboriginal Place. The strict liability offence of harming Aboriginal objects has a number of defences. The two defences relevant to the proposed development are the statutory defence of due diligence through complying with an adopted industry code, or compliance with the conditions of an Aboriginal Heritage Impact Permit (AHIP).

#### Due Diligence Approach

The OEH has issued a code of practice guideline that defines a due diligence approach to Aboriginal heritage: *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (13 September 2010). This guideline is designed to assist individuals and organisations to exercise due diligence when carrying out activities that may harm Aboriginal objects, and/or Aboriginal places, and to determine whether they should apply for consent in the form of an AHIP.

The *Due Diligence Code of Practice* sets out the reasonable and practicable steps which individuals and organisations need to take in order to:

- identify whether or not Aboriginal objects are, or are likely to be, present in an area;
- determine whether or not their activities are likely to harm Aboriginal objects (if present); and
- determine whether an AHIP application is required.

The OEH has defined due diligence thus:

*Due diligence is a legal concept describing a standard of care. Exercising due diligence means turning your mind to the likely risks of your proposed course of action. It is not enough to perform activities carefully. Due diligence requires*



*consideration of your obligations under, in this case, the NPW Act, and the consideration and adoption of a course of action that is directed towards preventing a breach of the Act.*

*In the context of protecting Aboriginal cultural heritage, due diligence involves taking reasonable and practicable measures to determine whether your actions will harm an Aboriginal object and if so avoiding that harm.<sup>2</sup>*

The steps that are required to follow the due diligence process are:

- searching the Aboriginal Heritage Information Management System (AHIMS);
- identifying any landscape features which may indicate the presence of Aboriginal objects;
- devising strategies to avoid harming Aboriginal objects;
- conducting desktop assessment and visual inspection to confirm the potential presence of Aboriginal objects; and
- producing an impact assessment.<sup>3</sup>

In preparing this report, GML complied with the guidelines set out in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (13 September 2010). The extent of land covered by the due diligence process is described as the study area.

### **1.6.2 Heritage Act 1977 (NSW)**

The Heritage Act is a statutory tool designed to conserve New South Wales' environmental heritage. It is used to regulate the impacts of development on the state's heritage assets. The Heritage Act defines a heritage item as 'a place, building, work, relic, moveable object or precinct'. To assist in management of the state's heritage assets, the Heritage Act distinguishes between items of local and state heritage significance.

- 'Local heritage significance', in relation to a place, building, work, relic, movable object or precinct, means significance to an area in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item.
- 'State heritage significance', in relation to a place, building, work, relic, movable object or precinct, means significance to the state in relation to the historical, scientific, cultural, social, archaeological, architectural, natural or aesthetic value of the item. There are no items listed on the State Heritage Register located within the subject site, adjacent or in its vicinity.

Specifically, for archaeology, the Act defines a 'relic' as any deposit, object or material evidence that:

- *relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement; and*
- *is of State or Local heritage significance.*

Archaeological features and deposits are afforded statutory protection by the 'relics' provision of the Heritage Act (as amended in 1999).

Section 139(1) of the Heritage Act states that:

*A person must not disturb or excavate any land knowing or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed unless the disturbance or excavation is carried out in accordance with an excavation permit.*

Excavation permits may be issued under Section 141 of the Heritage Act by the Heritage Council of NSW (or by the Heritage Division, Office of Environment and Heritage [OEH], Department of Premier and Cabinet, under delegation).

This report considers whether the study area has the potential to contain significant archaeological remains as well as those that would be considered 'relics' under the Heritage Act.

### 1.6.3 Environmental Planning and Assessment Act 1979 (NSW)

The EPA Act is administered by the NSW Department of Planning and Environment and provides for environmental planning instruments to be made to guide the process of development and land use. The EPA Act also provides for the protection of local heritage items and conservation areas through listing on Local Environmental Plans (LEPs) and State Environmental Planning Policies (SEPPs), which provide local councils with the framework required to make planning decisions.

### 1.6.4 Hornsby Local Environmental Plan 2013

As previously mentioned, the study area is now located within the Parramatta LGA. However, GML Heritage has been advised by Landcom that the planning controls in the Hornsby Local Environmental Plan 2013 (HLEP 2013) still apply to the site.

The Hornsby LEP 2013 contains the following provisions relevant to the heritage items in Part 5 Clause 10—Heritage Conservation. The relevant objectives 5.10 (1) are listed as:

- *To conserve the environmental heritage of Hornsby,*
- *To conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,*
- *To conserve archaeological sites,*
- *To conserve Aboriginal objects and Aboriginal places of heritage significance.*

Clause 5.10(2) establishes the requirements for development consent as it applies to heritage items:

*Development consent is required for any of the following:*

- *Demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):*
  - (i) *A heritage item,*
  - (ii) *An Aboriginal object,*
  - (iii) *A building, work, relic or tree within a heritage conservation area.*
- *altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,*
- *disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,*
- *disturbing or excavating an Aboriginal place of heritage significance,*
- *erecting a building on land:*



- (i) on which a heritage item is located or that is within a heritage conservation area, or
  - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,
- subdividing land:
  - (i) on which a heritage item is located or that is within a heritage conservation area, or
  - (ii) on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.

Clause 5.10(7) addresses the requirements for archaeological sites:

*The consent authority must, before granting consent under this clause to the carrying out of development on an archaeological site (other than land listed on the State Heritage Register or to which an interim heritage order under the Heritage Act 1977 applies):*

- *notify the Heritage Council of its intention to grant consent, and*
- *take into consideration any response received from the Heritage Council within 28 days after the notice is sent.*

Clause 5.10(8) establishes guidelines in relation to places of Aboriginal significance:

*The consent authority must, before granting consent under this clause to the carrying out of development in an Aboriginal place of heritage significance:*

- *consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place by means of an adequate investigation and assessment (which may involve consideration of a heritage impact statement), and*
- *notify the local Aboriginal communities in writing or in such other manner as may be appropriate, about the application and take into consideration any response received within 28 days after the notice is sent.*

The study area is not registered in the Hornsby LEP (Figure 1.3). Nearby registered items are:

- Item Number 357, Local Significance—Bushland—Beecroft Road;
- Item Number 403, Local Significance—‘Woodlands’—25 Ray Road; and
- Heritage Conservation Area C11, Local Significance—Rosebank Avenue Conservation Area.

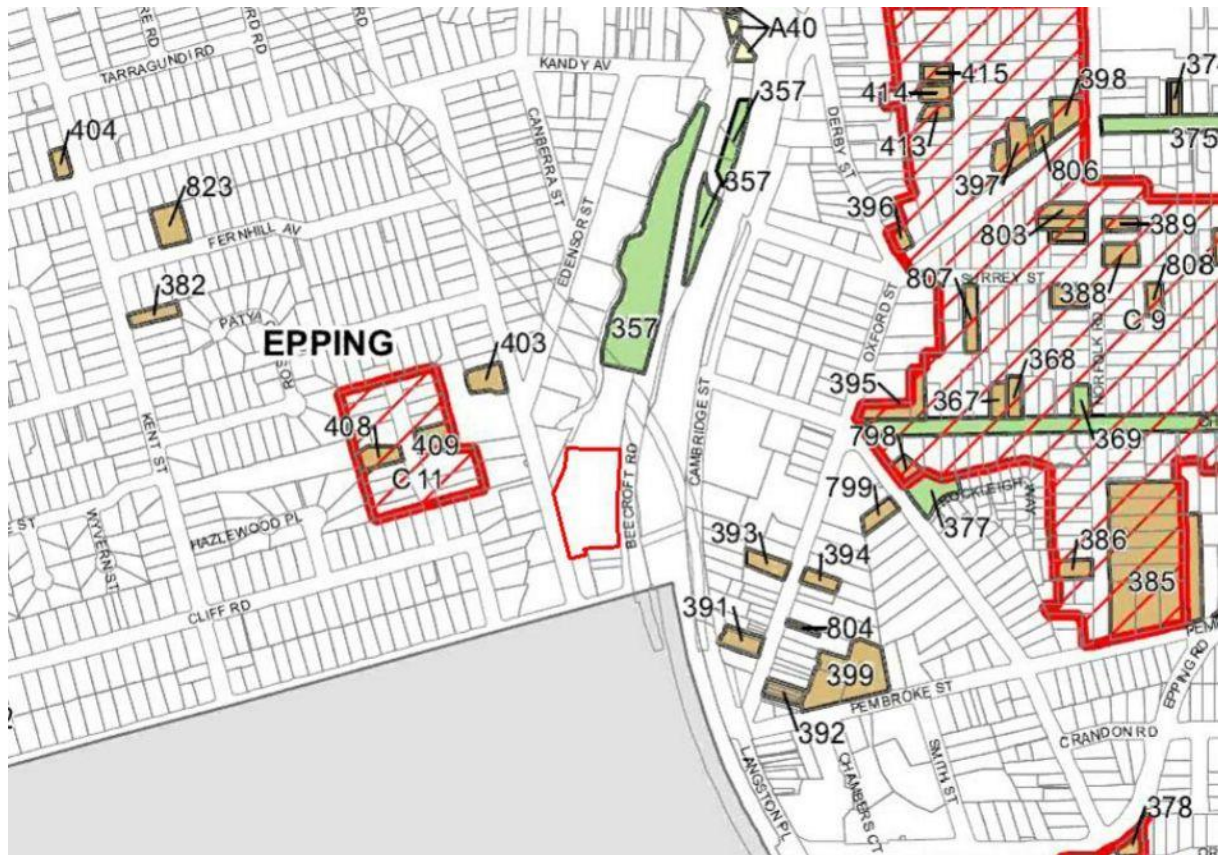


Figure 1.3 Hornsby LEP heritage map. (Source: Hornsby LEP with GML additions, 2017)

### 1.6.5 Hornsby Development Control Plan 2013

In addition to the provisions of the Hornsby LEP 2013, the Hornsby Development Control Plan (HDCP 2013) contains several provisions relevant to the development of the site that apply to development on and in the vicinity of heritage items or conservation areas as identified within the Hornsby LEP 2013.

The relevant provisions of Section 9 are extracted below:

#### 9.1.2 Development Application Submission Requirements

a. Development applications for heritage items normally require:

- Heritage Impact Statement; and
- measured drawings of the existing building including elevations.

#### 9.4 Development in the Vicinity of Heritage

##### 9.4.1 Development in the Vicinity of Heritage Items and Heritage Conservation Areas

#### Desired Outcomes

a. New work that is sympathetic to the heritage significance of nearby heritage items, or adjoining heritage conservation area, and their settings.

#### Prescriptive Measures

Heritage Items

- a. Design and siting of new work should complement the form, orientation, scale and style of the heritage item.*
- b. Adequate space should be provided around the heritage item to allow for its interpretation.*
- c. Development should maintain significant or historic public domain views to and from the heritage item.*
- d. Original or significant landscape features that are associated with the heritage item and which contribute to its setting should be retained.*

*Heritage Conservation Areas*

- e. Development in the vicinity must respect the curtilage and setting of the HCA and protect views into and from the HCA.*
- f. Development is to be sympathetic to the primary characteristics and heritage values of the HCA with regards to proposed:*
  - *context, including backdrop to places in the HCA;*
  - *bulk, height alignment form and roofline of new development;*
  - *proportions such as windows and door openings (number and location) and balconies;*
  - *interface facade materials, treatments and palette;*
  - *Compatible [sic] fencing and screening.*
- g. Development applications for multi-unit developments adjacent to HCAs must include a construction impact report demonstrating that the construction process will not detrimentally or indirectly adversely impact places in the HCA at the time of construction or over time.*

*Notes: These controls apply to land that is adjoining, or across the road from a heritage item or a heritage conservation area.*

**9.5 Aboriginal Heritage**

**9.5.1 Aboriginal Relics or Places of Heritage Significance**

*This section provides guidelines for the development of land that may contain an Aboriginal relic or place of heritage significance.*

**Desired Outcomes**

- a. Development that protects Aboriginal sites and archaeological relics by minimising the likelihood of disturbance.*

**Prescriptive Measures**

- a. An assessment of Aboriginal heritage should accompany any development application on lands that contain culturally modified trees or recorded Aboriginal objects.*
- b. An assessment of Aboriginal heritage should accompany any development application for work to land that has not been disturbed and is:*
  - *within 200 metres of waterways;*
  - *located within a sand dune system;*
  - *located on a ridge top, ridge line or headland;*
  - *located within 200 metres below or above a cliff face;*

or

- within 20 metres of or in a cave, rock shelter or a
- cave mouth.

c. When an assessment of Aboriginal heritage is required, a report should be prepared in accordance with published best practice guidelines and submitted with the Development Application. This should include an Aboriginal Heritage and Information Management System certificate for property that contains listed objects/ sites.

d. Works, including landscaping and associated elements, should be located away from sites and potential sites containing archaeological relics.

e. The depth and extent of excavation should be minimised where land contains, or is likely to contain, archaeological remains or relics.

Notes:

**Land is disturbed** if it has been the subject of a human activity that has changed the land's surface, being changes that remain clear and observable. Examples include ploughing, construction of rural infrastructure (such as dams and fences), construction of roads, trails and tracks, clearing vegetation, construction of buildings and the erection of other structures, construction or installation of utilities and other similar services.

**For further information on best practice guidelines** refer to:

- Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW 2011, and
- Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW (2010)

by NSW Office of Environment & Heritage available at [environment.nsw.gov.au](http://environment.nsw.gov.au).

For further information and to obtain a certificate from the Aboriginal Heritage and Information Management System (AHIMS) database refer to the NSW Office of Environment & Heritage website [www.environment.nsw.gov.au](http://www.environment.nsw.gov.au).

Aboriginal heritage sites and archaeological relics can occur in a range of places, including private property. In Hornsby Aboriginal sites include:

- Engravings on sandstone ridges;
- Rock shelters on the valley slopes containing cave paintings, drawing sites and archaeological deposits;
- Open campsites and grinding grooves on valley floors;
- Shell middens along tidal waterways; and
- Scarred trees.

## 1.7 Methodology and Terminology

### 1.7.1 Methodology

This report has been prepared in accordance with the following documents:

- *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water [DECCW] 2010);
- *NSW Heritage Manual—'Archaeological Assessments'* (NSW Heritage Office 1996);

- *Assessing Significance for Historical Archaeological Sites and Relics* (NSW Heritage Branch 2009); and
- *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance 2013* (the Burra Charter).

## 1.8 Author Identification

This report has been prepared by the following GML consultants: Jodi Cameron (Heritage Consultant, Archaeologist), Lisa Trueman (Senior Heritage Consultant). It has been peer reviewed by Claire Nunez (Associate) and Dr Jennifer Jones (Senior Heritage Consultant, Archaeologist).

## 1.9 Endnotes

- <sup>1</sup> Department of Environment, Climate Change and Water (DECCW) 2010, *National Parks and Wildlife Act 1974*, 'Fact sheet 1', September 2010.
- <sup>2</sup> DECCW, *Due diligence guidelines for protection of Aboriginal objects in NSW*, 24 April 2009.
- <sup>3</sup> DECCW 2010, *National Parks and Wildlife Act 1974*, 'Fact sheet 2', September 2010.

## 2.0 Historical Background

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### 2.1 Aboriginal History

Before European settlers arrived in 1788, the Sydney basin had already been home to Aboriginal people for thousands of years. The traditional inhabitants of Epping were identified through ethnohistorical accounts as members of the Wallumedegal or Wallumettagal clans, who were reported in early colonial journals as occupying the area along the northern bank of the Parramatta River from Burramatta, and the head of the river, to the West and to Lane Cove River in the East.<sup>1</sup>

Aboriginal clan boundaries in Australia have been primarily reconstructed based on surviving linguistic evidence and are therefore only approximations. It is further noted that social interaction, boundaries and linguistic evidence may not always correlate, and it is likely boundaries as well as interaction and communication levels varied and fluctuated over time. The population sizes of clan groups in the Sydney region prior and up to colonisation were not recorded, though anthropological studies undertaken in other parts of Australia suggest that clan sizes vary widely from 25 to 60 members, with rarely more than 50. It is possible that clan groups in Sydney followed a similar pattern.<sup>2</sup>

Historical accounts and archaeological evidence suggest that at the time of European occupation of the Sydney region from 1788, the estimated population of Aboriginal people (including the lower Blue Mountains) ranged from 4000 to 8000.<sup>3</sup> The decimation of the Aboriginal population of the Sydney region following colonisation is well documented. The first major epidemic was an outbreak of what is thought to have been smallpox in April 1879, called *gal-galla* by the local people, which killed well over half of the original inhabitants of Sydney.<sup>4</sup> Beyond the smallpox epidemic, ongoing activities by colonists resulted in the alienation of Aboriginal peoples from their land and food sources. Punitive expeditions, homicides, guerrilla warfare and other introduced diseases reduced population numbers even further.<sup>5</sup>

#### 2.1.1 Material Culture

The differences in material culture between clans in the Sydney region was remarked upon in early ethnohistorical accounts. Each local clan was differentiated by distinctive tools and weapons, manufacturing techniques, decorations on their bodies and hairstyles, and the songs and dances that they performed.<sup>6</sup> The following observations were made by judge and advocate David Collins in 1798:

*It must be observed, that the principal tribes have their peculiar weapons. Most of us had made collections of their spears, or throwing-sticks, etc as opportunities occurred; and on shewing [sic] them to our Sydney friends, they have told us that such a one was used by the people who lived to the southward of Botany Bay; that another belonged to the tribe of Cam-mer-ray. The spear of the wood tribes, Be-dia-gal, Tu-ga-gal, and Boo-roo-bir-rong-gal, were known from being armed with bits of stone, instead of broken oyster shells. The lines worn round the waist of the men belonged to a particular tribe, and came into the hands of the others either by gift or plunder. The nets used by the people of the coast for carrying their fish, lines, etc differed in the mesh from those used by the wood natives; and they extend this peculiarity even to their dances, their songs, and their dialect.<sup>7</sup>*

#### 2.1.2 Patterns of Land Use

The Wallumedegal lived as fishers, hunters and gatherers, fishing and gathering shellfish in the river flats and mangrove swamps and creeks as well as hunting birds, small game and a variety of edible plant foods in the Cumberland Plains woodlands which formerly covered the ridges and hills of Epping. The Aboriginal people used traditional land management practices to assist in hunting various native animals for meat and skins. Firing was used to create grassland open spaces, whereby animals encouraged to graze could be easily hunted.

## 2.2 European History

The region was first settled by Europeans in 1794 when David Kilpatrick, an emancipated convict, received land grants in the region. Further land parcels were given as grants in the following years, including William Kent and his nephew, William C. Kent, who were given c630 acres in what is now the western side of Epping.<sup>8</sup>

As more settlers moved into the area to farm, the Government set aside Crown lands as common areas for the use of the pioneer settlers to graze animals, allowing personal allotments to be available for food crops. In 1804, a parcel of land labelled 'the Fields of Mars' was set aside for this purpose, stretching from the eastern border of William Kent's land grants to the Lane Cove River (see Figure 2.1 and Figure 2.2).<sup>9</sup>

During the early colonial years, Epping played an important role in providing timber for the fledgling colony. A convict camp was established in the area in c1817 to mill the timber from the surrounding dense bushlands (Figure 2.1). By 1825 the area was known as Barren Ridges due to the effectiveness of the timber industry in the region, and orchards and farms were established in the newly cleared area. The convict camp and sawmill—known as the Barren Ridges Sawing Establishment—occupied an area of what is now Oxford Street in the Epping Town Centre and remained in operation until the 1830s.<sup>10</sup>

With the decline of the timber milling, settlers utilised the newly cleared area for growing fruits and vegetables, with a citrus orchard established by the Mobb family in the 1920s and the Hazelwood plant nursery following soon after in the 1960s.<sup>11</sup>

In 1874, the *Field of Mars Resumption Act* was passed by the Government and the Crown lands were subdivided and sold. The first subdivision of the Field of Mars coincided with the opening of the Field of Mars railway station in 1886, with the station shortly renamed 'Epping Station' following the renaming of the township in 1899. The convenience of the railway line, combined with the once more heavily forested area, made Epping a very desirable choice, with the beginning of subdivisions marking the start of the suburb of Epping<sup>12</sup> (Figure 2.3).

The properties along what is now Beecroft Road were some of the first parcels of land to be subdivided and sold from the Kent land grant. Parish maps from the 1890s and 1903 suggest that the study area was originally reserved for quarrying activities, with Hornsby Shire Council and a private company granted special leases (Figure 2.3). It is unlikely, however, that the land was utilised for quarrying, as there is little physical or documentary evidence to support this type of land use.

Improvements made to the region's road network in the interwar period saw another marked increase in subdivision of the Epping region, shortly followed by the housing crisis in the postwar period.<sup>13</sup> The small farms and orchards in the region were subdivided further and sold to meet the demand for land and housing in the area.

By the 1930s a variety of different structures had been built within the study area, including several houses and shops, a timber yard and factory (Figure 2.4–Figure 2.6). As the sewerage was not connected until 1959, it is also likely the study area contained wells, cisterns, cesspits and privies to provide basic water and sanitation requirements to the occupants of the study area.

The timber yard and factory were cleared and replaced by a business park of two- and three-storey buildings in the 1970s–1980s with residential units also constructed on the western portion of the study



area with frontage to Ray Road<sup>14</sup> (Figure 2.8 and Figure 2.9). Most recently, parts of the study area have been utilised as a construction site and staging area as part of the major NSW infrastructure project, the 'North West Rail Link'.

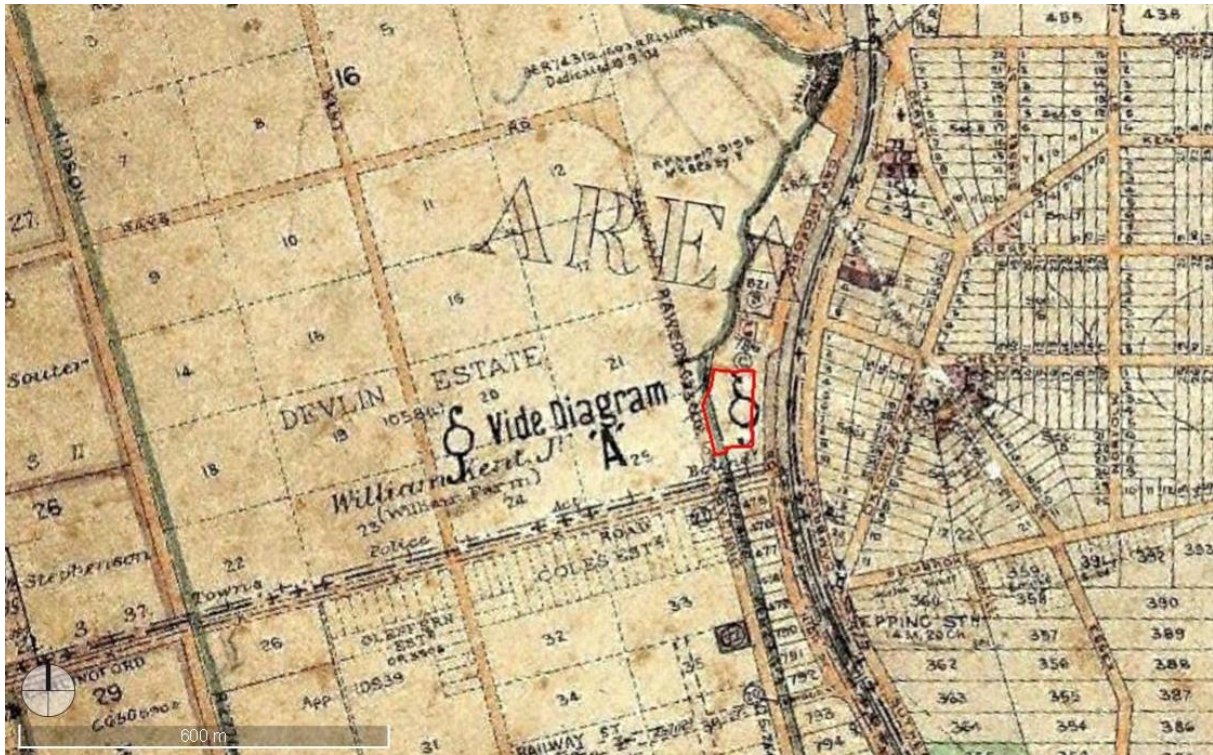


**Figure 2.1** 1820–1834 sketch map of the Field of Mars, showing the early subdivisions in the area. The approximate location of the study area is in red. (Source: State Library of NSW with GML additions, 2017)



**Figure 2.2** 1862 sketch of the Field of Mars showing the location of William Kent's Land Grants. The approximate location of the study area is in red. (Source: State Library of NSW with GML additions, 2017)





**Figure 2.3** 1894 subdivision plan showing the study area. The symbol within the study area indicates the land was resumed for quarrying. (Source: NSW Land and Property Information with GML additions, 2017)

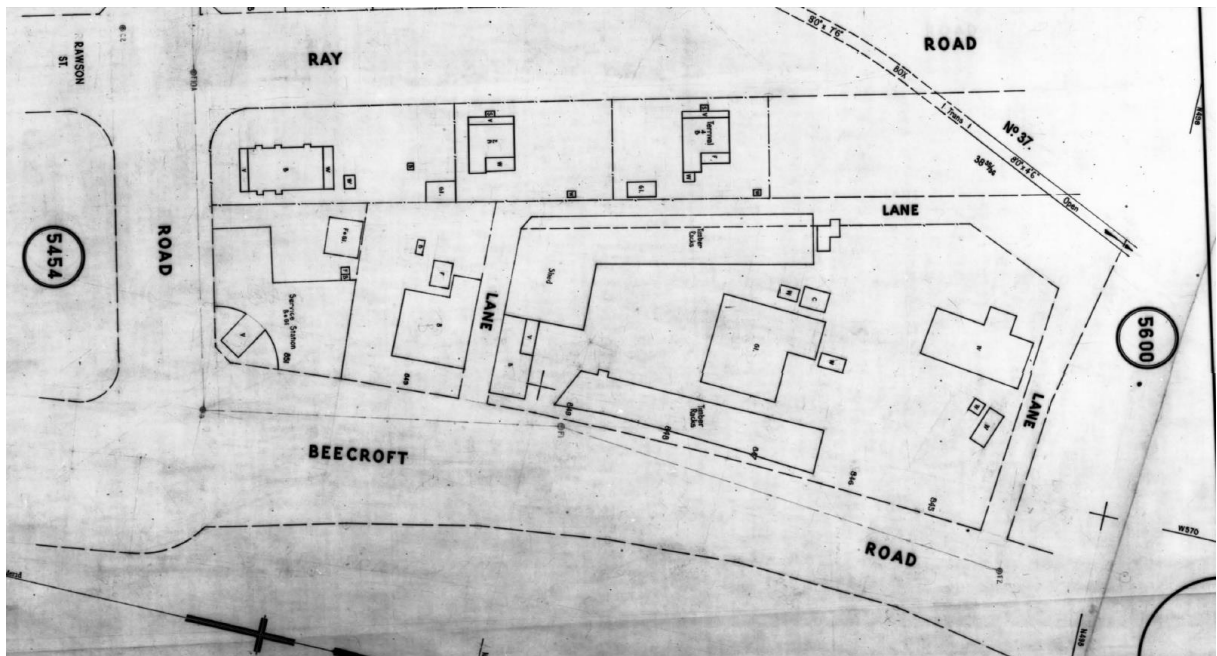


**Figure 2.4** 1930 aerial of the study area. (Source: NSW Land and Property Information with GML additions, 2017)





**Figure 2.5** 1943 aerial of the study area. (Source: SIX Maps with GML additions, 2017)



**Figure 2.6** 1958 Sydney Water Board plan showing the structures previously within the study area. (Source: WaterNSW Historical Research Archive)



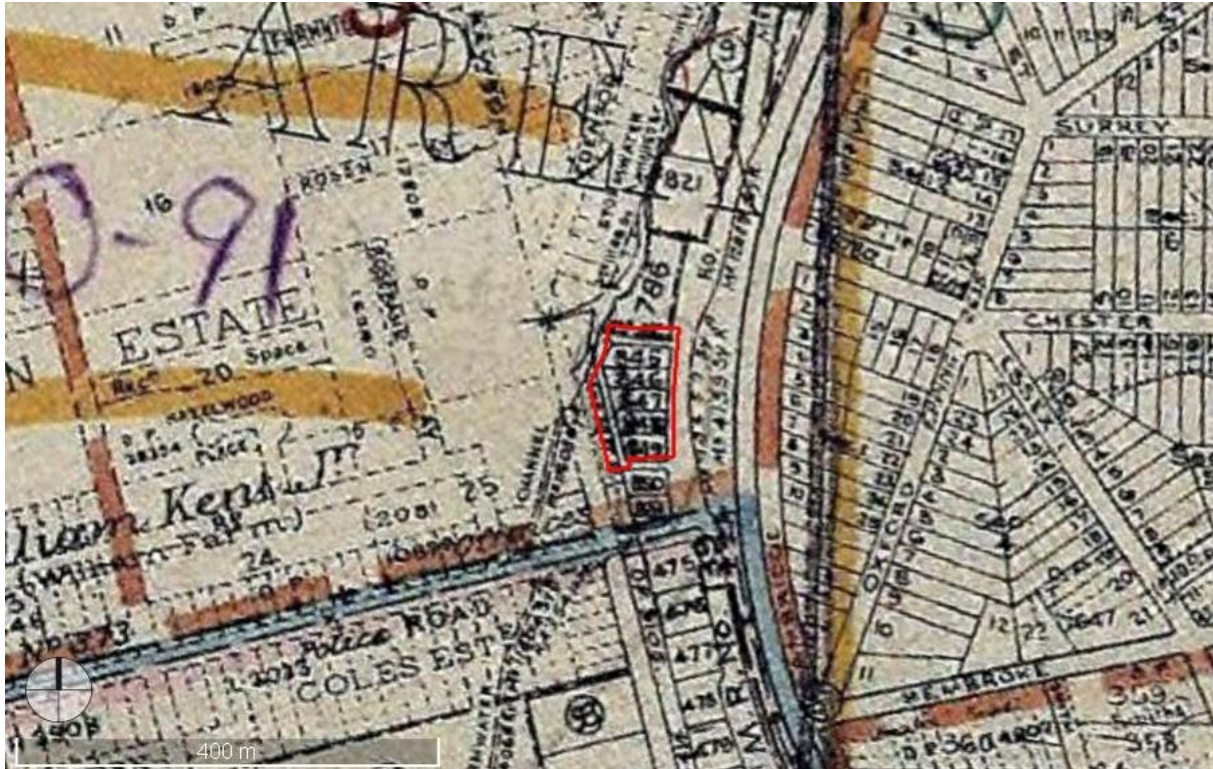


Figure 2.7 1959 subdivision map of the Field of Mars. (Source: NSW Land and Property Information with GML additions, 2017)

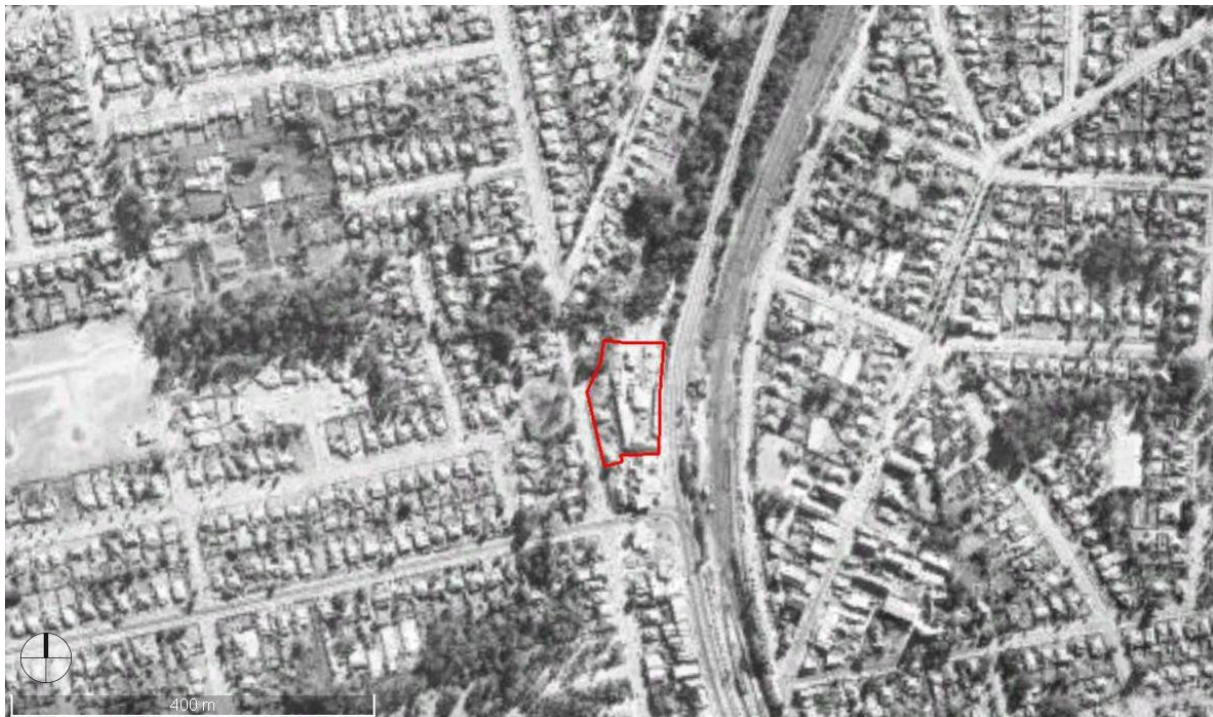


Figure 2.8 1961 aerial of the study area. (Source: NSW Land and Property Information with GML additions, 2017)





**Figure 2.9** 1979 aerial showing the study area. Note the timber yard and factory have been cleared. (Source: NSW Land and Property Information with GML additions, 2017)



**Figure 2.10** 2003 aerial of the study area showing the c1980s business park and residential units. (Source: Google Earth with GML additions, 2017)

## 2.3 Endnotes

- <sup>1</sup> City of Ryde, 'Aboriginal History', viewed 3 November 2017 <<http://www.ryde.nsw.gov.au/Library/Local-and-Family-History/Historic-Ryde/Aboriginal-History>>.
- <sup>2</sup> Attenbrow, V 2002, *Sydney's Aboriginal Past: Investigating the Archaeological and Historical Records*, University of New South Wales Press Ptd Ltd, Sydney, p 29.
- <sup>3</sup> Attenbrow, V 2002, *Sydney's Aboriginal Past: Investigating the Archaeological and Historical Records*, University of New South Wales Press Ptd Ltd, Sydney, p 17.
- <sup>4</sup> Attenbrow, V 2002, *Sydney's Aboriginal Past: Investigating the Archaeological and Historical Records*, University of New South Wales Press Ptd Ltd, Sydney, p 21.
- <sup>5</sup> Attenbrow, V 2002, *Sydney's Aboriginal Past: Investigating the Archaeological and Historical Records*, University of New South Wales Press Ptd Ltd, Sydney, p 22.
- <sup>6</sup> Attenbrow, V 2002, *Sydney's Aboriginal Past: Investigating the Archaeological and Historical Records*, University of New South Wales Press Ptd Ltd, Sydney, p 28.
- <sup>7</sup> Attenbrow, V 2002, *Sydney's Aboriginal Past: Investigating the Archaeological and Historical Records*, University of New South Wales Press Ptd Ltd, Sydney, p 28.
- <sup>8</sup> Rowland, J 2008, 'Epping', Dictionary of Sydney, viewed 25 September 2017 <<http://www.dictionaryofsydney.org/entry/epping>>.
- <sup>9</sup> Rowland, J 2008, 'Epping', Dictionary of Sydney, viewed 25 September 2017 <<http://www.dictionaryofsydney.org/entry/epping>>.
- <sup>10</sup> Artefact Heritage Services Pty Ltd, Epping Road Westbound Widening between Essex Street and Blaxland Street Road at Epping, Statement of Heritage Impact, prepared for GHD, 2015, p 19.
- <sup>11</sup> Rowland, J 2008, 'Epping', Dictionary of Sydney, viewed 3 November 2017 <<http://www.dictionaryofsydney.org/entry/epping>>.
- <sup>12</sup> Rowland, J 2008, 'Epping', Dictionary of Sydney, viewed 3 November 2017 <<http://www.dictionaryofsydney.org/entry/epping>>.
- <sup>13</sup> Tropman Australia Pty Ltd, Redevelopment of 35 Oxford Street, Epping, NSW—Heritage Impact Statement, prepared for Luxcon Developments Pty Ltd, October 2015.
- <sup>14</sup> Wilson, M 2017, 'Re: Summary of Applications—240–244 Beecroft Road Epping – GIPA/1019/2017', email, 6 November 2017.

## 3.0 Site Analysis

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### 3.1 Visual Inspection of the Site

The subject site was inspected on 2 November 2017. The entire site is currently used as a rail operations facility (Epping Services Facility) to support the construction and future operations of Sydney Metro Northwest.

Prior to its purchase by Transport for NSW in 2012, the site was used as the Epping Business Park and was occupied by three commercial buildings. Two of those buildings have now been demolished and the building at 4 Ray Road remains intact. This is a late-twentieth-century flat roofed commercial office building, and is currently used by rail contractors.

The part of the site adjacent to the commercial building contains a carpark and various slabs, sheds, plants and other structures that support the construction of the railway works.

The northern part of the site is a major tunnelling site for the Metro Northwest tunnelling works. Tunnelling works are currently in progress on this part of the site.

Ground visibility was poor across the study area as the majority of the study area was a construction site and other areas contained hard landscaping. During the site inspection, no Aboriginal artefacts, scarred trees, rock shelters, sandstone outcrops or other sandstone surface exposures with the potential to contain art or axe grinding grooves were observed within the study area.

No evidence of the former timber yard or factories was identified during the site inspection. The construction of the commercial buildings appears to have involved earthworks, which would have removed any evidence of previous phases of occupation within the study area.

Development surrounding the subject site is of a mix of building types and scales. A service station is located to the south, directly adjacent to the site. Directly to the north of the site, remnant bushland remains within the Beecroft Road Reserve. Along Ray Road to the west and north of the site, existing development consists of two- to four-storey apartment buildings. On the eastern side of Beecroft Road and the railway line, a number of high density residential developments up to 72m tall are currently under construction.

The photographs below were taken by GML during the site inspection.



### 3.2 Images of the Site



**Figure 3.1** The existing commercial building on the western part of the site (4 Ray Road).



**Figure 3.2** The eastern part of the site looking towards Beecroft Road.



**Figure 3.3** The eastern part of the site looking north.



**Figure 3.4** The eastern part of the site looking south.



**Figure 3.5** The eastern part of the site looking east.



**Figure 3.6** The existing commercial building and carpark.





**Figure 3.7** The entrance to the existing building at 4 Ray Road.



**Figure 3.8** Carparking under the building at 4 Ray Road.



**Figure 3.9** Tunnelling works at the northern part of the site.



**Figure 3.10** Tunnelling works at the northern part of the site.

### 3.3 Images of the Surrounding Area



**Figure 3.11** Ray Road looking north from the subject site.



**Figure 3.12** Ray Road looking west from the subject site.





**Figure 3.13** Apartment building directly north of the subject site.



**Figure 3.14** Ray Road and Edensor Road to the north of the subject site.



**Figure 3.15** Ray Road, development adjacent to 'Woodlands' (25 Ray Road).



**Figure 3.16** Looking from 'Woodlands' (25 Ray Road) towards the subject site.



**Figure 3.17** Ray Road, development adjacent to 'Woodlands' (25 Ray Road).



**Figure 3.18** Ray Road looking across the subject site to the high density development on the eastern side of the Northern Railway.



**Figure 3.19** The service station adjacent to the subject site from the south.



**Figure 3.20** Looking north along Beecroft Road with the subject site on the left.

## 4.0 Description of Proposal

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### 4.1 Introduction

Landcom is seeking approval of the Concept Proposal and Stage One works for a residential development of a State Significant Development of approximately 442 dwellings, and the subdivision of one allotment into two lots, at 240–244 Beecroft Road, Epping.

The proposed development meets the criteria for State Significant Development under the SEPP in size and capital investment value of over \$30 million.

The current proposal is described as:

- **Concept Proposal** for the site comprising:
  - Building envelope with a maximum height up to RL 48m
  - Residential yield of approximately 442 dwellings (including a minimum of 5% affordable housing units)
  - Maximum residential gross floor area (GFA) of around 39,000m<sup>2</sup>
  - Car parking for approximately 356 spaces within the basement
  - Loading, vehicular and pedestrian access arrangements.
- **Stage 1 Application** for the sub division of the site into two lots for the Epping Service Facility and the proposed residential flat building development and sub-stratum over the rail corridor.

### 4.2 Description of the Proposed Works

#### 4.2.1 Stage One Works

The northern part of the site, which contains the Epping Services Facility for the Sydney Metro Northwest, will be subdivided and will house a permanent services facility for Sydney Metro Northwest. The northern allotment will have an area of 3,253m<sup>2</sup>.

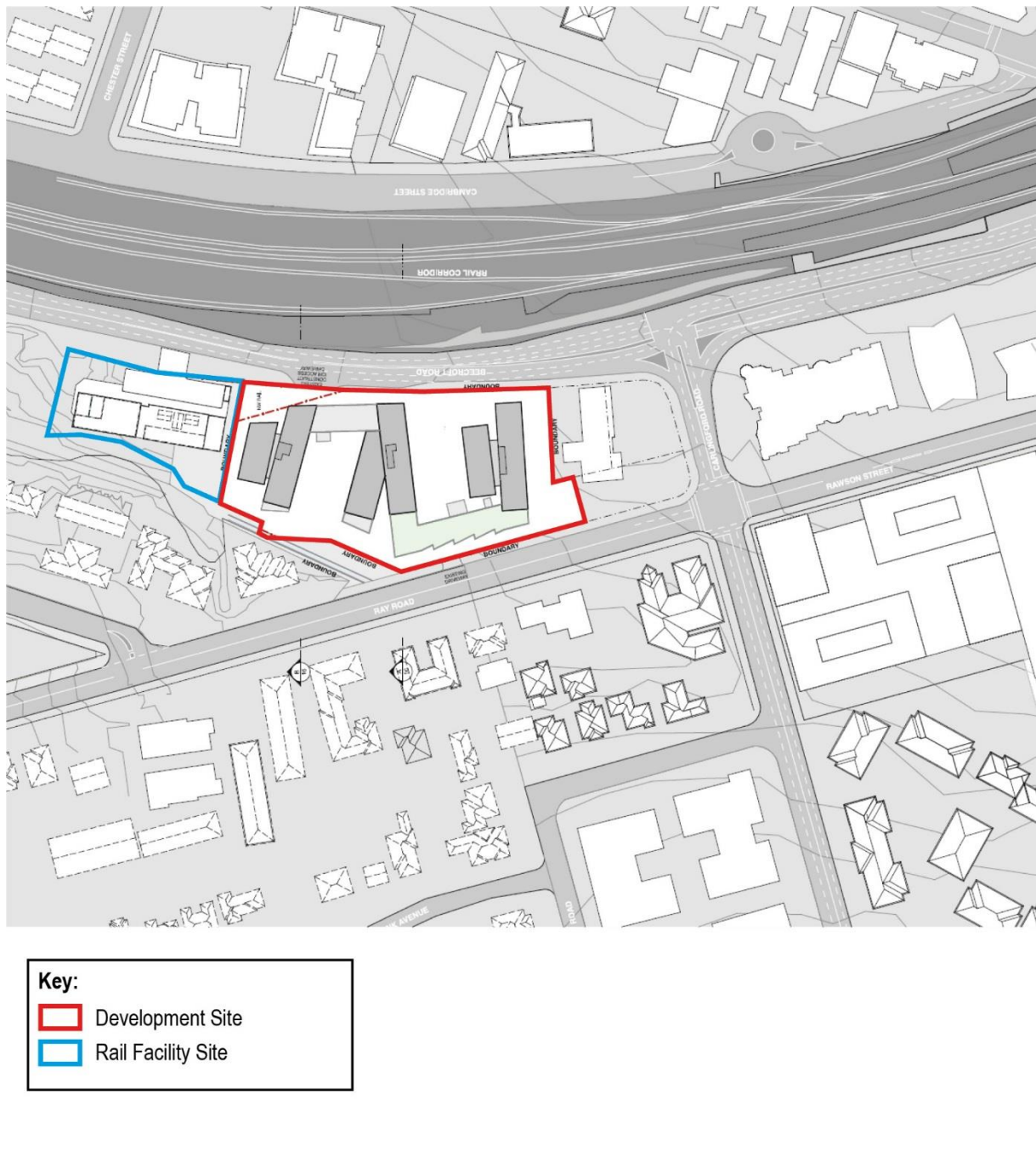
#### 4.2.2 Concept Proposal

The southern part of the site, with an area of 10,120m<sup>2</sup>, will be developed for primarily residential uses, with three 15/16-storey towers containing 442 residential units.

The two northern towers will be connected by a five-storey podium along Beecroft Road, and a three-storey podium will connect the two southern towers along Ray Road. Non-residential uses are proposed to be located at ground level on Ray Road. The development will have communal open spaces between the towers and a through link connecting Beecroft and Ray Roads. There are two proposed carpark entry points, one on Beecroft Road and one on Ray Road.

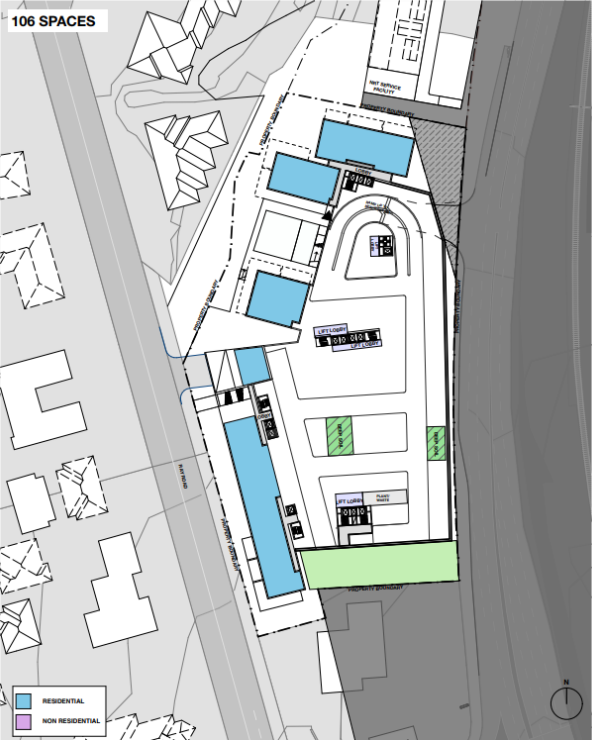
The subdivision boundaries and indicative location of the residential towers is shown on the site plan below.





**Figure 4.1** Site plan. (Source: Landcom with GML overlay, 2017)

CONCEPT PROPOSAL - PLANS - LG & GF



CONCEPT PROPOSAL - PLANS- L1-L4 & L5

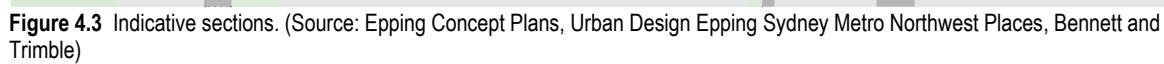


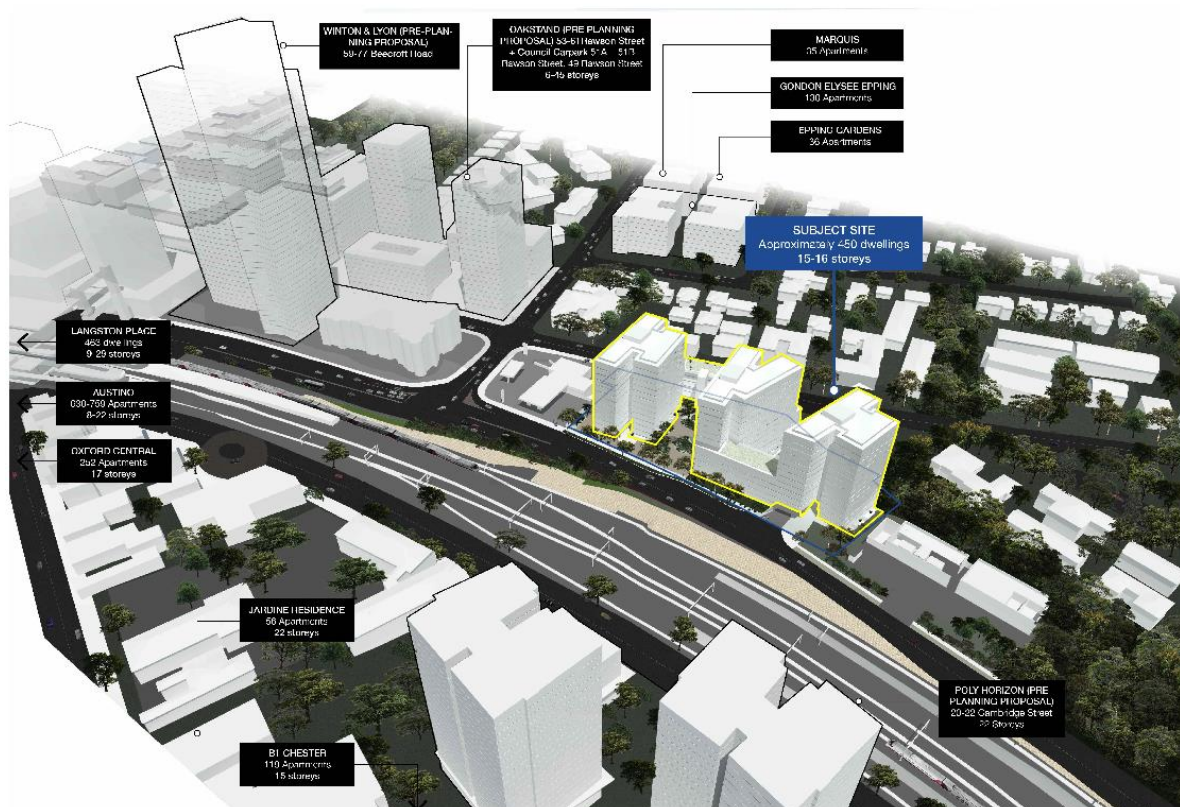


## CONCEPT PROPOSAL - PLANS - TOWER

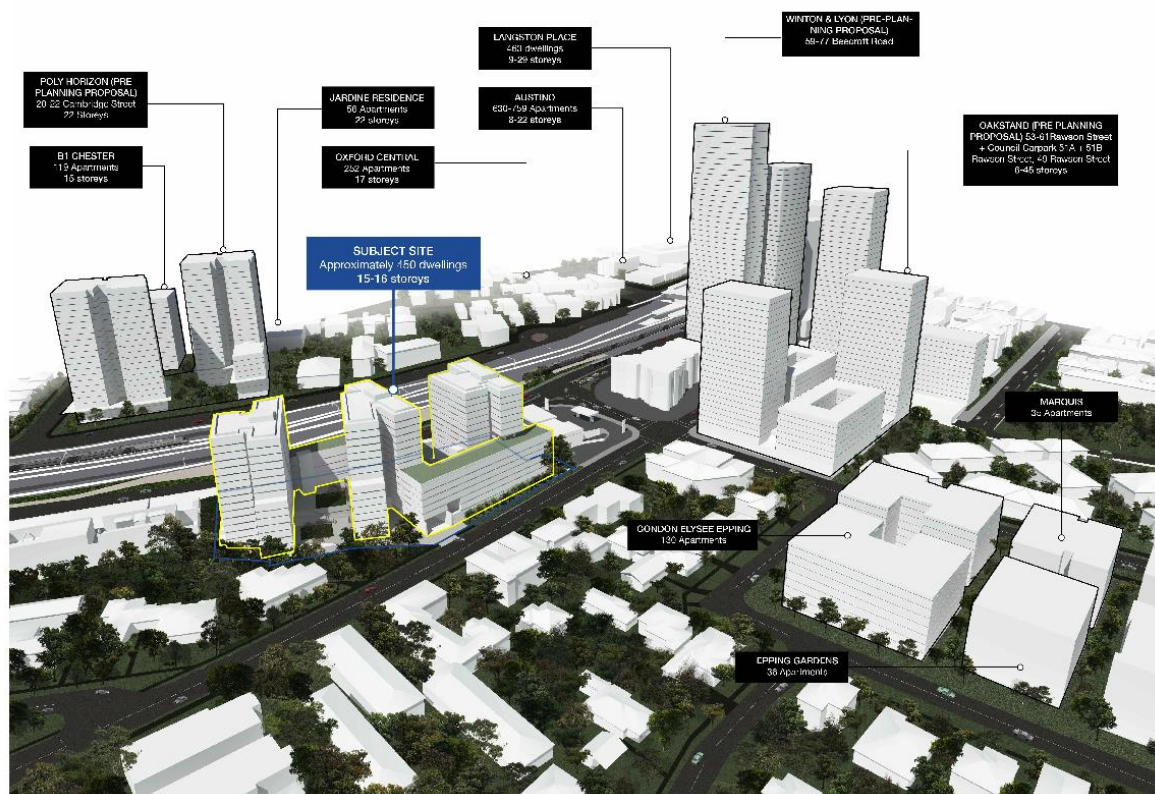


**Figure 4.2** Indicative floor plans. (Source: Epping Concept Plans, Urban Design Epping – Sydney metro Northwest Places, Bennett and Trimble)





**Figure 4.4** Concept design—airial view 1. (Source: Epping Concept Plans, Urban Design Epping - Sydney Metro Northwest Places, Bennett and Trimble)



**Figure 4.5** Concept design—airial view 2. (Source: Epping Concept Plans, Urban Design Epping Urban Design Epping - Sydney Metro Northwest Places, Bennett and Trimble)

## 5.0 Built Heritage Assessment

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### 5.1 Introduction

This section gives an overview description of the heritage significance of the site at 240–244 Beecroft Road, Epping, and the listed heritage items in the vicinity of the site, and provides an assessment of the impacts of the proposed development on those heritage items.

This impact assessment follows the *Statements of Heritage Impact* guidelines as published by the NSW Heritage Office (revised 2002), and is consistent with the relevant principles and guidelines of the *Australia ICOMOS Burra Charter*, 2013 (the Burra Charter).

This assessment is based on the document '*Urban Design Epping — Urban Design Epping - Sydney Metro Northwest Places*', drawn by Bennett and Trimble Pty Ltd, Issue A (Draft), dated 29 May 2018. This document was provided to GML by Landcom on 30 May 2018.

### 5.2 Existing Buildings on the Site

The entire site is currently used as a rail operations facility (Epping Services Facility), to support the construction and future operations of Sydney Metro Northwest.

Prior to 2012, the site was used as the Epping Business Park and was occupied by three commercial buildings. Of the buildings, two have been demolished and 4 Ray Road remains intact. That building is a three-storey late twentieth-century commercial office building that has no distinguishing features and no discernible heritage significance.

The part of the site adjacent to the commercial building contains a carpark and various slabs, sheds, plants and other structures that support the construction of the railway works.

The northern part of the site is a major tunnelling site for the Metro Northwest tunnelling works. Tunnelling works are currently in progress on this part of the site. The site has no identified or discernible heritage significance.

The current condition of the site is described in further detail in Section 3.0 of this report.

### 5.3 Heritage Context

The subject site is not listed as a heritage item on the SHR or within the HLEP 2013. There are no heritage items listed in the State Heritage Register located adjacent to, or in the vicinity

#### 5.3.1 Heritage Items in the Vicinity

Although the subject site is not listed as a heritage item on the SHR or within the HLEP 2013, there are a number of heritage items listed within HLEP 2013 as well as a heritage conservation area located near the site. Heritage items within 500m of the site are listed in the table below and on Figure 5.1.

**Table 5.1** Listed Heritage Items within the Immediate and Wider Vicinity of the Site. (Source: HLEP 2013)

Item Address	Item Name	Item Number	Significance	Distance from Site
Beecroft Road Reserve, Epping	Bushland	I357	Local	Adjacent
25 Ray Road, Epping	'Woodlands'	I403	Local	100m north
9 Rosebank Avenue, Epping	House	I408	Local	200m northwest
10 Rosebank Avenue, Epping	House	I409	Local	100m northwest
Rosebank Avenue, Epping	Rosebank Avenue Conservation Area	C11	Local	100m west
9 Oxford Street, Epping	'School of Arts' and Garden	I391	Local	200m southeast
31 Oxford Street, Epping	'Our Lady Help of Christians' Church	I393	Local	200m east
10–16 Oxford Street, Epping	Shops	I392	Local	300m southeast
38 Oxford Street, Epping	House	I804	Local	300m east
48 Oxford Street, Epping	House	I394	Local	250m east
6 Essex Street	Boy Scout Hall	I799	Local	300m east
5X Essex Street	Rockleigh Park	I377	Local	350m east
3–5 Pembroke Street, Epping	St Alban's Anglican Church and grounds	I399	Local	300m southeast
56A Oxford Street	Chester Street Uniting Church and Grounds	I395	Local	250m east
3 Essex Street	House	I798	Local	350m east
	East Epping Conservation Area	C9	Local	250m east
Epping Railway Station Group	Epping Railway Station Group	Beecroft Road, Epping	RailCorp S170 Heritage and Conservation Register	250m south



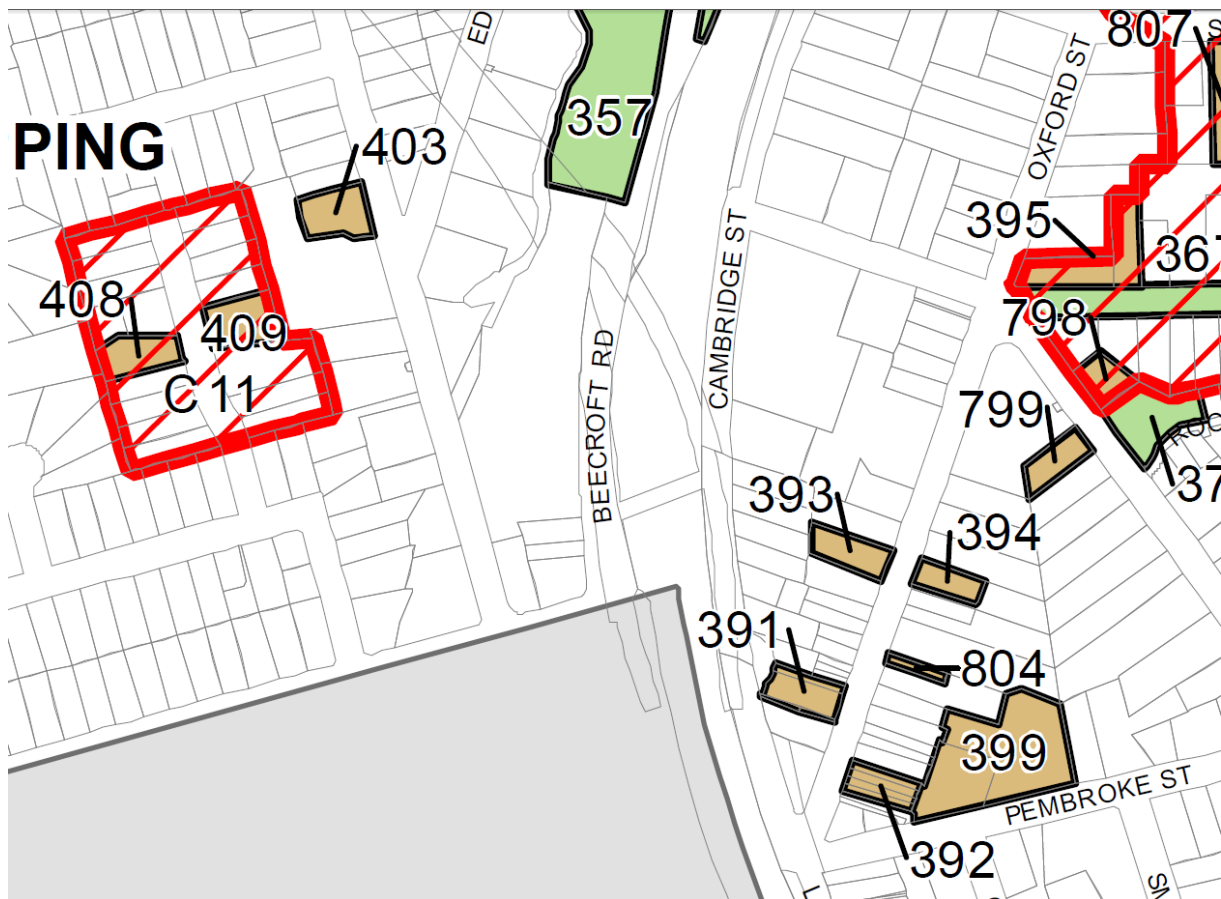


Figure 5.1 Heritage items in the vicinity of the site. (Source: HLEP 2013 with GML overlay)

## 5.4 Heritage Impact Assessment

### 5.4.1 Summary of Proposed Works

The proposal involves the Concept Proposal and Stage One works for a State Significant Development comprising the subdivision of the site to create two separate lots, and concept approval of a residential flat building development. The northern allotment will accommodate the permanent services facility for Sydney Metro NorthWest and the southern part of the site will be developed with a series of three residential towers located on a non-residential podium.

The proposed development is discussed in further detail in Section 4.0 of this report.

### 5.4.2 Assessment of Heritage Impacts

Based on the location of the heritage sites with respect to the proposed works, it is considered that no heritage items are likely to be affected by the proposed Concept Proposal and Stage One works.

#### Assessment of Impact on Heritage Items in the Near Vicinity

The heritage items in the close vicinity of the site are:

1. the adjacent remnant bushland on the road reserve on Beecroft Road, which is located directly adjacent to the site; and

2. the house 'Woodlands' (25 Ray Road), which is located on the opposite side of Ray Road approximately 100m to the north.

The impact of the proposal on these heritage items is detailed in the table below.

**Table 5.2** Impact of Proposal on Heritage Items in the Vicinity.

Item	Bushland, Beecroft Road Reserve, between Carlingford Road and Kandy Avenue
Image	 <p data-bbox="491 1205 1362 1234"><b>Figure 5.2</b> Bushland, Beecroft Road Reserve, as viewed from the subject site. (Source: GML 2017)</p>  <p data-bbox="491 1964 1362 1993"><b>Figure 5.3</b> Bushland, Beecroft Road Reserve, as viewed from the subject site. (Source: GML 2017)</p>



Item	Bushland, Beecroft Road Reserve, between Carlingford Road and Kandy Avenue
Significance	Local
Statement of Significance	<p>'Remnant native forest in prominent location along Beecroft Road in Epping. Of local significance.' (Source: Office of Environment and Heritage, State Heritage Inventory, 'Bushland', viewed 14 November 2017  <a href="http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=1780714">http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=1780714</a>)</p> <p>Remnant native forest and sandstone outcropping located north of Epping Station. Individual trees within the bushland date from c1940 and include Blackbutt Blue Gum, Stringybark, Red Bloodwood, Pittosporum and many smaller shrubs. The bushland has aesthetic significance at the local level, forming an attractive visual corridor along Beecroft Road. The bushland provides evidence of the original, natural landscape of the Epping area.</p>
Heritage Impact	<p>The remnant bushland is separated from the development site by the northern section of the site, which is to be subdivided from the development site to become a permanent rail services facility. A lapped and capped fence separates the rail services site from the bushland.</p> <p>The proposed development on the southern part of the site will have a minor impact on some existing views of the bushland across the site, which have been opened due to demolition of previous buildings on the site. However, the major views of the bushland from the public domain are along Beecroft Road, Ray Road and Edensor Street to the north, and these views will be retained. The Concept Proposal and Stage One works do not involve any physical impact on the remnant bushland.</p> <p>The development site is sufficiently separated from the bushland to ensure that there is no adverse impact. However, the impact of the proposed rail services facility will need to be assessed in future stages of the development to ensure there is no impact on the bushland, which is immediately adjacent.</p>

Item	'Woodlands' House
Image	 <p><b>Figure 5.4</b> 'Woodlands', 25 Ray Road, Epping. (Source: GML 2017)</p>
Significance	Local
Statement of Significance	<p>'Fine quality Federation Bungalow style house with complex roof form and good original sandstone. Integrity partly compromised by verandah enclosures.' (Source: Office of Environment and Heritage, State Heritage Inventory, 'Emmaus Bible College', viewed 14 November 2017  <a href="http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=1780194">http://www.environment.nsw.gov.au/heritageapp/ViewHeritageItemDetails.aspx?ID=1780194</a>)</p>

Item	'Woodlands' House
	Woodlands House has aesthetic and representative significance at the local level. It is a good, representative example of the Federation Bungalow style architecture and retains primary features of the style, including shingled gables, a sandstone and timber verandah and tapering chimneys with a roughcast finish. The visual setting of the house has been compromised by the adjacent residential flat development, built within the original grounds.
Heritage Impact	The proposed development site is separated from Woodlands House by existing medium density residential development along Ray Road and the eastern side of Edensor Street, which obstruct all views of the heritage item from the subject site. The curtilage of the heritage item is limited to its lot boundaries and views of the house are limited due to the adjacent medium density development to the south, obscuring views of the heritage item from the subject development site. Although larger in scale than adjacent development on Ray Road, the proposed development has a two-storey podium at Ray Road, which is consistent with the scale of surrounding development and mitigates the impact of the towers on the streetscape. The development site is sufficiently separated from the heritage item to ensure that there will be no adverse impact on the significance or curtilage of the heritage item.

### Assessment of Impact on Heritage Items in the Wider Vicinity

There are a number of other local heritage items that are located within the wider vicinity of the development site. These heritage items will not be impacted by the proposed works due to their distance from the proposed development, and the scale of existing development separating the heritage items and the site, which obstructs any visual connection between the site and the heritage items.

The Rosebank Avenue Conservation Area and the heritage listed houses at 9 and 10 Rosebank Avenue are separated from the development site by medium density development (two–four-storey residential flat buildings) along the western side of Ray Road that visually and physically separates the site from the conservation area. Existing development along Ray Road provides a transitional element between the low scale character of the conservation area and the high density development along Beecroft Road.

The heritage items to the east, including those located on Oxford Street and Essex Street, the East Epping Conservation Area, and Epping Railway Station Group, are separated from the subject site by Beecroft Road and the Northern Rail Line. Development along the eastern side of the rail line is characterised by high density residential towers, currently under construction, of up to 72m in height, that form a physical and visual barrier between the heritage items and the subject site.

The proposed residential development at 240–244 Beecroft Road consists of three residential towers on a non-residential podium, with a maximum height of 48m, or 15 storeys. It is noted that the site is zoned R4 High Density Residential with a maximum height limit of 48m. Although this is significantly higher than existing development on the site and to its north and west, it is consistent with development to the south and east, in an area that is undergoing significant change.

Despite the scale of the proposed development, it is not considered to have an adverse impact on the significance of those heritage items located in the wider vicinity of the subject site, due to the separation of the heritage items in the wider vicinity from the subject site by existing larger scale development. The proposed development will not impact on the significance or setting of those items in the wider vicinity, or their setting or curtilage.

#### 5.4.3 Statement of Potential Heritage Impact—Built Heritage

The proposed development at 240–244 Beecroft Road is not considered to have an adverse impact on the heritage items in the vicinity of the site. The significant remnant bushland on Beecroft Road, which is immediately adjacent to the Epping Services Facility at the northern part of the site, will not be impacted by the proposed Stage One subdivision works, as no physical works are proposed to the

northern part of the site at this stage. The concept proposal for the development site will impede some views of the bushland from the public domain. However, the major views along Beecroft and Edensor Road will be retained.

Any future development of the Epping Services Facility site will need to consider the potential impact on the adjacent remnant bushland, and detailed heritage advice for the development of this lot should be sought during future stages of the development.

The Stage One and Concept Proposal for 240–244 Beecroft Road, Epping, will not impact on the listed house at 25 Ray Road, 'Woodlands', due to the physical separation of the two sites and the existing medium density developments along Ray Road which have restricted the visual curtilage of the heritage item. The subject residential development will not further impede views of the heritage item from the public domain.

The heritage items and conservation area in the wider vicinity, to the east and west, are sufficiently separated from the subject site by larger scale development that they will not be impacted by the proposed development.

## 6.0 Assessment of Aboriginal Archaeological Potential

### 6.1 AHIMS Search

An extensive search of the OEH AHIMS database of latitude and longitude from -33.8036, 151.0176 to -33.7202, 151.1498 surrounding the study area was undertaken on 31 October 2017. This search covered the area of approximately 5km around the study area and results are shown in Figure 6.1 and Figure 6.2. Table 6.1 provides an overview of the different site features identified within the bounds of the AHIMS search, and their frequency.

There are currently no registered sites or Aboriginal Places identified within the study area. Surrounding the study area, the search identified 91 recorded Aboriginal sites. No Aboriginal Places were identified in this search.

**Table 6.1** Results of AHIMS Search.

Site Type (Site Feature)	Frequency
Axe Grinding Groove, Rock Engraving: Art (Pigment or Engraved), Grinding Groove	1
Axe Grinding Groove, Water Hole/Well: Grinding Groove, Water Hole	1
Axe Grinding Groove: Grinding Groove	7
Isolated Find: Artefact	1
Midden: Artefact, Shell	2
Not Specified: Art (Pigment or Engraved)	1
Not Specified: Artefact	8
Not Specified: Artefact, Hearth	1
Not Specified: Artefact, Potential Archaeological Deposit (PAD)	1
Not Specified: Grinding Groove	3
Not Specified: Potential Archaeological Deposit (PAD)	6
Not Specified: Shell	1
Open Camp Site: Artefact	6
Rock Engraving: Art (Pigment or Engraved)	14
Scarred Tree: Modified Tree (Carved or Scarred)	1
Shelter with Art, Shelter with Deposit: Art (Pigment or Engraved), Artefact	4
Shelter with Art, Shelter with Midden: Art (Pigment or Engraved), Artefact, Shell	1
Shelter with Art: Art (Pigment or Engraved)	7
Shelter with Deposit: Artefact	23
Shelter with Midden: Artefact, Shell	2
<b>Total</b>	<b>91</b>

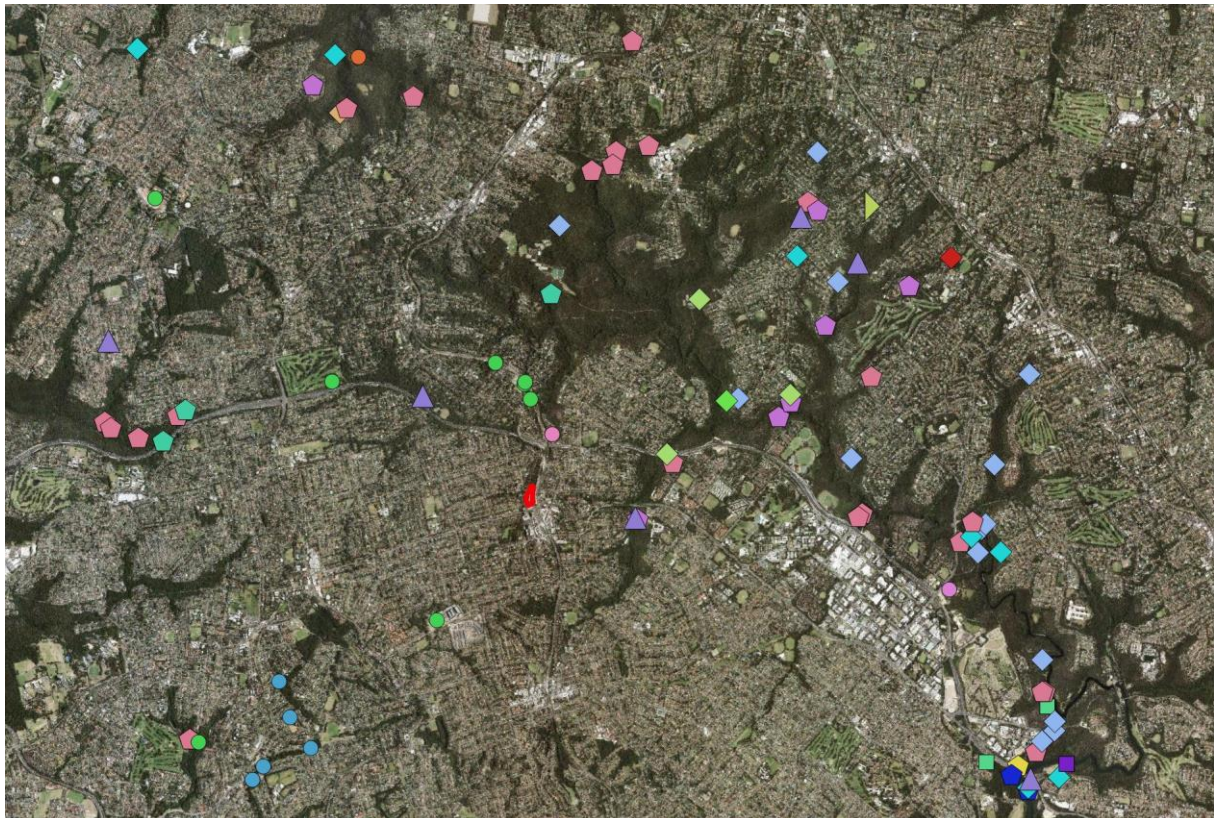
The range of different types of Aboriginal archaeological sites found in and around Epping provides scientific evidence that Aboriginal people used this landscape in a range of ways, likely over a long period of time. The types of sites recorded fundamentally fall into three categories: those associated with resource (food) procurement, processing and discard; habitation locations (shelters); and art sites, which were associated with wider Aboriginal traditions.

This AHIMS search indicated that artefact sites constitute the predominant remnants recorded in this area. Forty-nine of the 91 AHIMS sites (54 per cent) contain artefacts. Art sites are also common across the region with 28 (31 per cent) of the registered AHIMS sites containing art. Three AHIMS sites have been updated as 'Not a Site', as well as two artefact sites and one PAD (#45-5-1005, #45-6-2681 and #45-6-2861), suggesting that they were removed, absent or otherwise impacted after initial recording.

There is one AHIMS site within a kilometre of the study area (Figure 6.2). AHIMS site #45-5-1005 (IFCH1) is the closest site to the current study area. It is also one of the three sites that has been updated as 'Not a Site'. Figure 6.2 shows all AHIMS sites within 2km of the study area.

In general, there is a pattern of landform association between recorded sites and water systems. The majority of sites in this area are within close proximity to the many creeks and rivers in the region.





Label (Site Type: Site Feature)

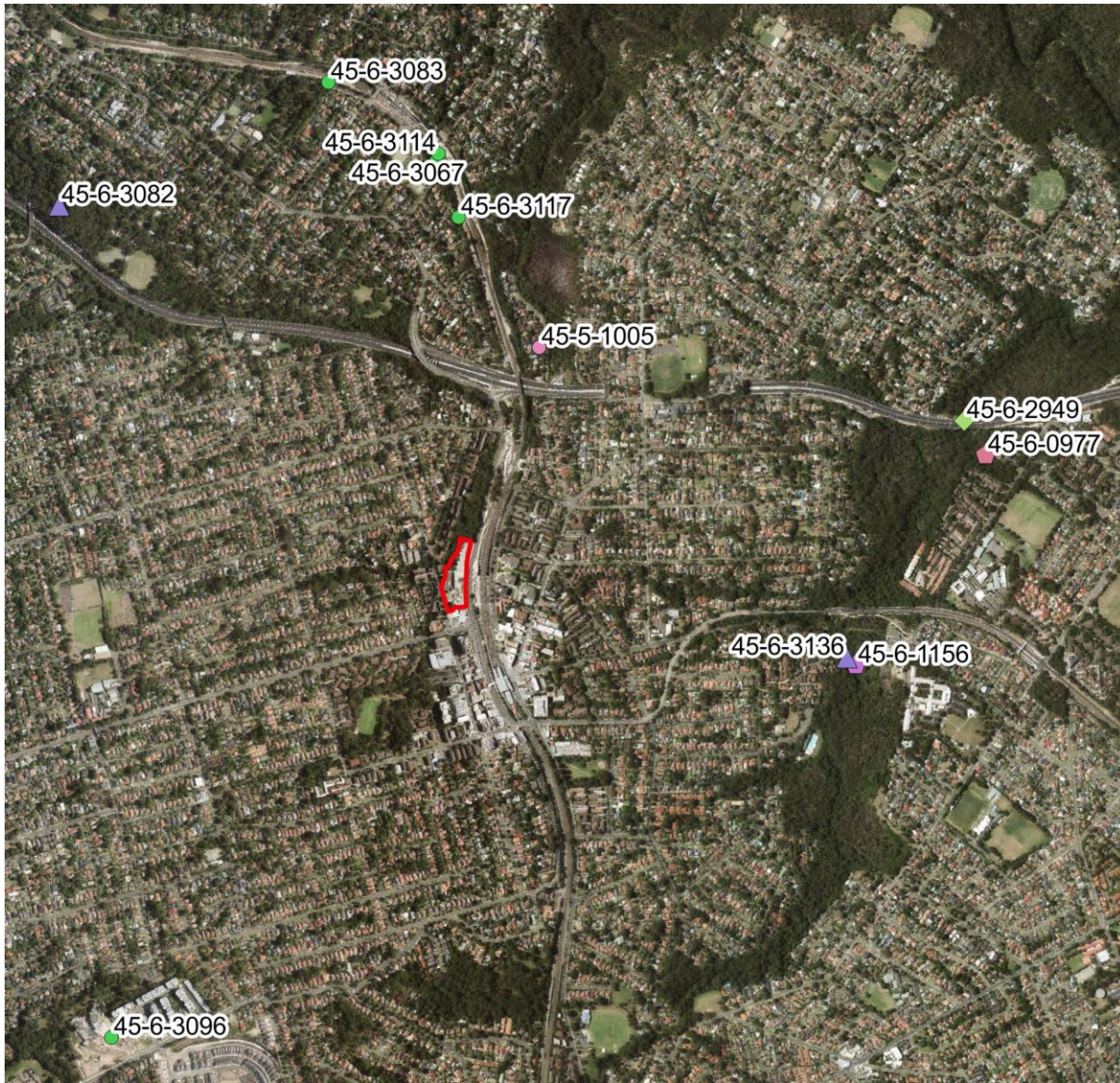
- ◆ Axe Grinding Groove, Rock Engraving: Art (Pigment or Engraved), Grinding Groove
- ◆ Axe Grinding Groove, Water Hole/Well: Grinding Groove, Water Hole
- ◆ Axe Grinding Groove: Grinding Groove
- Isolated Find: Artefact
- Midden: Artefact, Shell
- ◆ Not Specified: Art (Pigment or Engraved)
- Not Specified: Artefact
- Not Specified: Artefact, Hearth
- Not Specified: Artefact, Potential Archaeological Deposit (PAD)
- ◆ Not Specified: Grinding Groove
- ▲ Not Specified: Potential Archaeological Deposit (PAD)
- Not Specified: Shell
- Open Camp Site: Artefact
- ◆ Rock Engraving: Art (Pigment or Engraved)
- ▲ Scarred Tree: Modified Tree (Carved or Scarred)
- ◆ Shelter with Art, Shelter with Deposit: Art (Pigment or Engraved), Artefact
- ◆ Shelter with Art, Shelter with Midden: Art (Pigment or Engraved), Artefact, Shell
- ◆ Shelter with Art: Art (Pigment or Engraved)
- ◆ Shelter with Deposit: Artefact
- ◆ Shelter with Midden: Artefact, Shell
- Study Area



0 1 2 3 4 km

Figure 6.1 AHIMS search results. (Source: Nearmap with GML additions, 2017)





Label (Site Type: Site Feature)

- Isolated Find: Artefact
- Not Specified: Artefact
- ◆ Not Specified: Grinding Groove
- ▲ Not Specified: Potential Archaeological Deposit (PAD)
- ◆ Shelter with Art: Art (Pigment or Engraved)
- ◆ Shelter with Deposit: Artefact
- Study Area

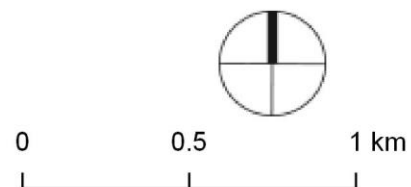


Figure 6.2 Detailed AHIMS search. (Source: Nearmap with GML additions, 2017)

## 6.2 Environmental Context

The purpose of this section is to provide environmental contextual information for use in developing a predictive model of Aboriginal site locations associated with the study area. Interactions between people and their surroundings are of integral importance in both the initial formation and the subsequent preservation of the archaeological record. The nature and availability of resources including water, flora



and fauna and suitable raw materials for the manufacture of stone tools and other items had (and continues to have) a significant influence over the way in which people utilise the landscape.

Alterations to the natural environment also impact upon the preservation and integrity of any cultural materials that may have been deposited, whilst current vegetation and erosional regimes affect the visibility and detectability of Aboriginal sites and objects. For these reasons, it is essential to consider the environmental context as a component of any heritage assessment.

### 6.2.1 Geology and Soils

The underlying geology of the study area is the Wianamatta Group Ashfield Shale, which is comprised of laminite and dark grey shale (Figure 6.3). To the north of the study area is Hawkesbury sandstone, which consists of medium to coarse grained quartz sandstone with minor shale and laminate lenses. Glenorie soil landscape overlies the Ashfield Shale (Figure 6.4). Glenorie soil landscape is an erosional landscape, with shallow to moderately deep (<100cm) soils on crests, moderately deep (70–150cm) soils on upper slopes and deep (>200cm) soils on lower slopes.



**Figure 6.3** Geological landscapes surrounding the study area. (Source: Google Earth Pro with GML additions, 2017)



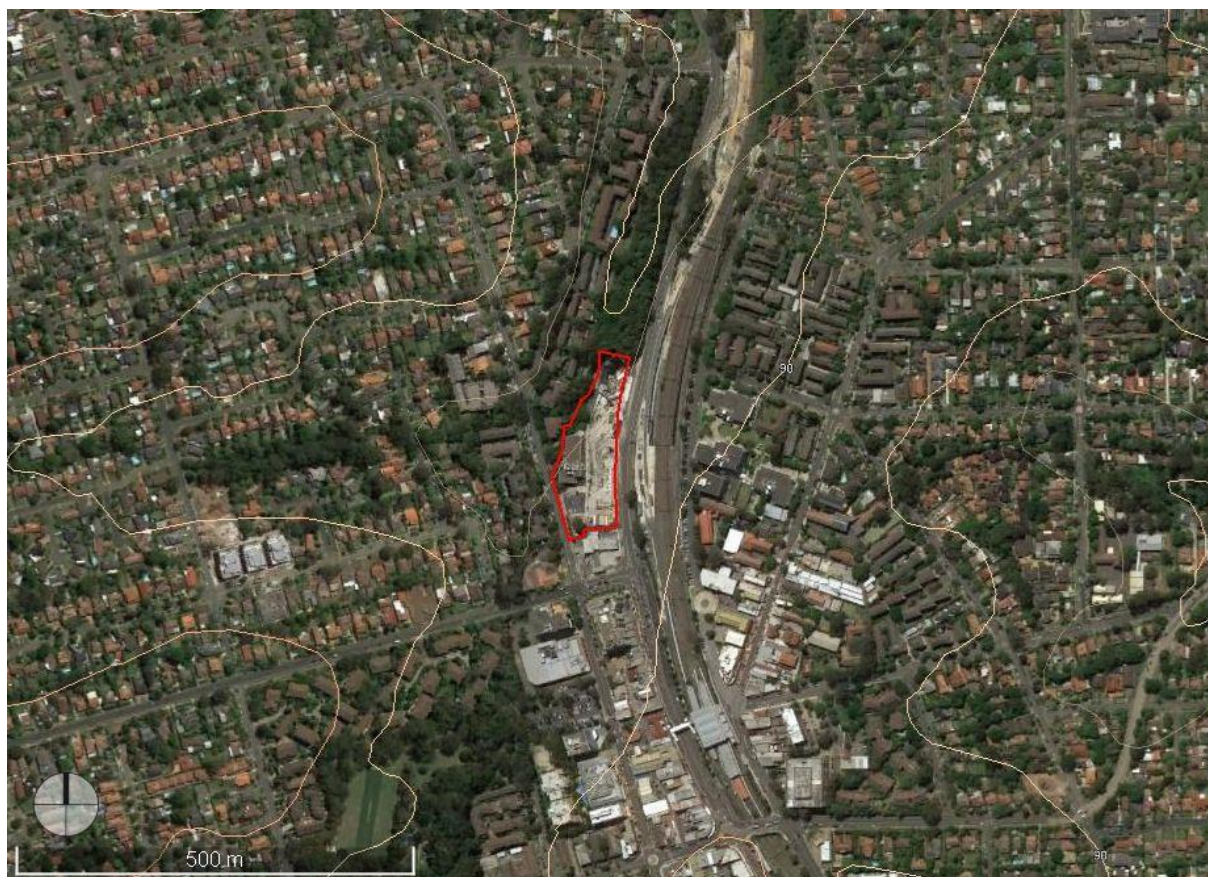
**Figure 6.4** Soil landscapes surrounding the study area. (Source: Google Earth Pro with GML additions, 2017)

### 6.2.2 Landform and Landscape Features

The study area is located on a gradual slope of the low, rolling hills which surround Epping. There is no water source running through the study area. Adjacent to the study area on the northwestern border is a small first order creek which is a tributary to the Devlins Creek system. Terrys Creek is also located approximately 1.2km west of the study area. Neither Devlins nor Terrys Creek are permanent sources of water. The nearest permeant source of water is the Lane Cove River approximately 2.3km to the northeast. The Parramatta River is approximately 5km to the south.

Prior to European land clearing, the natural vegetation would have been characterised by tall wet sclerophyll forest, dominated by the blue gum and blackbutt species and other species common to the Cumberland Plain.





**Figure 6.5** Study area with 10-metre contour lines. (Source: Google Earth Pro with GML additions, 2017)

### 6.3 Modern Land Use and Disturbance

The study area has undergone extensive development since European settlement. Full details of the developments within the study area can be found in Section 2.0.

An analysis of the historical aerals and modern land use history shows significant disturbance to the natural landscape. Soil profiles are likely to have been removed across the whole study area.

### 6.4 Relevant Local Literature

Numerous archaeological assessments have been undertaken surrounding the current study area. The following reports are relevant to the current study area.

#### **GML Heritage 2012—EIS 1—Major Civil Construction Works Indigenous Heritage**

GML prepared a heritage assessment as part of the environmental impact assessment for the North West Rail Link. The report covered the 23km rail line, between Epping and Rouse Hill. The current study area is adjacent to the starting point of the 2012 assessment. Due to the significant modern development across the site, the assessment identified no Aboriginal potential and Aboriginal heritage management was not required in the construction site.

#### **GML Heritage 2013—Kissing Point Road, Dundas**

In 2013 GML undertook a due diligence assessment of 172, 147, 176 and 176A Kissing Point Road, Dundas. This is approximately 4.6km southwest of the current study area. Due to the intensive

development across the study area, the due diligence assessment did not identify potential for Aboriginal objects. The report recommended the proponent proceed with caution.

### **GML Heritage 2017—Oxford and Cambridge Streets, Epping**

GML undertook preliminary heritage advice of Our Lady Help of Christians Church and Our Lady Help of Christians Catholic Primary School on Oxford and Cambridge Streets in Epping Town Centre. This site is directly across Beecroft Road and the rail line from the current study area, approximately 90m east. The preliminary advice identified minimal modern ground disturbance to the study area and recommended a full due diligence Aboriginal heritage assessment be undertaken to assess and identify areas of Aboriginal archaeological potential.

## **6.5 Predictive Modelling**

More than 4000 archaeological sites have been recorded on the Cumberland Plain, most of which are open artefact scatters. Given the ample availability of comparative data, predictive modelling on the Cumberland Plain has been developed over the past 20 years. Previously published research incorporating the results of these excavations provides spatial analysis of excavated archaeological deposits.<sup>1</sup> As a consequence of this work, the following predictive statements can be made:

- In the headwaters of upper tributaries (ie first order creeks), archaeological evidence is likely to be sparse and represent little more than background scatter.
- In the middle reaches of minor tributaries (ie second order creeks), there is likely to be archaeological evidence of sparse but focused activity (eg one-off camp locations, single episode knapping floors).
- In the lower reaches of tributary creeks (ie third order creeks), archaeological evidence for more frequent occupation is predicted. This could include repeated occupation by small groups, knapping floors (perhaps used and re-used), and evidence of more concentrated activities.
- On major creek lines, such as the lower reaches of Second Ponds and Caddies Creeks (ie fourth order creeks), archaeological evidence for more permanent or repeated occupation is likely. Sites are predicted to be complex and may even be stratified.
- Creek junctions may provide foci for site activity; the size of the confluence (in terms of stream ranking nodes) could be expected to influence the size of the site.
- Distance from water appears to be another factor, with higher artefact densities likely to occur within 50–101m from fourth order creeks and within 50m of second order creeks.
- Higher artefact densities are more likely to occur on terraces and lower slopes, while higher slopes are more likely to be characterised by sparse, discontinuous scatters.
- Lower slopes near major watercourses facing north or northeast generally contain higher artefact densities.
- Ridgetops between drainage lines often contain limited archaeological evidence, although isolated knapping floors and other forms of one-off occupation may be evident in such locations.<sup>2</sup>

The predictive model suggests that the most common site types across the Cumberland Plain are stone artefact sites, either as multiple finds (stone artefact concentrations) or as single occurrences (isolated



finds), and will primarily be located within a couple of hundred metres of a permanent water supply and/or resource zone.

## 6.6 Statement of Aboriginal Archaeological Potential

A search of the AHIMS database indicates that there are no recorded sites within the study area or its vicinity—the nearest recorded site is 1.04km north of the study area. In the wider landscape, previously recorded sites are within close proximity to waterways. The study area is located adjacent to a first order creek likely to provide only seasonal or ephemeral water access and the nearest permanent water source is located approximately 2.3km to the southwest (Lane Cove River).

Predictive modelling for the Cumberland Plains indicates that archaeological evidence associated with Aboriginal habitation and use of the area is likely to be limited in headwaters and upper tributaries, including first order creeks. Given that the study area is located adjacent to a first order creek some distance to permanent water sources and no sites have been recorded in the adjacent areas, it is less likely to contain Aboriginal archaeological remains. This is not to say that Aboriginal people did not move through or use the study area at any stage in the past, but rather that these activities may have been ephemeral and unlikely to have resulted in tangible material evidence, or Aboriginal 'objects', as defined by the NPW Act.

Modern land use and development across the study area has been intensive. These activities would likely have resulted in the removal of all Aboriginal archaeological resources. It is therefore unlikely that the study area contains any Aboriginal objects.

## 6.7 Potential Impacts and Mitigation Measures

The study area has been assessed as having low potential to contain Aboriginal objects. Therefore, the proposed works are unlikely to impact on Aboriginal archaeological remains. No further mitigation is recommended.

## 6.8 Endnotes

- <sup>1</sup> White, B and McDonald, J 2010, 'Lithic artefact distribution in the Rouse Hill Development Area, Cumberland Plain, NSW', *Australian Archaeology*, volume 70.
- <sup>2</sup> White, B and McDonald, J 2010, 'Lithic artefact distribution in the Rouse Hill Development Area, Cumberland Plain, NSW', *Australian Archaeology*, volume 70, p 36.

## 7.0 Historical Archaeological Potential and Significance

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### 7.1 Overview

This section discusses the site's potential to contain archaeological resources. This assessment is based on consideration of the current site conditions and examination of historical information related to the development and occupation of the site, including evidence of demolition and construction activities that may have disturbed archaeological remains associated with former site features and activities, both Aboriginal and non-Aboriginal.

The term 'archaeological potential' is defined as the likelihood that a site may contain physical evidence related to an earlier phase of occupation, activity or development. This term is differentiated from 'archaeological significance' and 'archaeological research potential', which are more subjective statements on the value of the archaeological resource in terms of levels of significance, and discussed in more detail in Section 7.3 of this report.

### 7.2 Assessment of Historical Archaeological Potential

#### 7.2.1 Archaeology of the Neighbourhood

Previous archaeological assessments that were identified for neighbouring properties include the North West Rail Link, Epping Services Facility (Beecroft Road, adjacent to the current study area),<sup>1</sup> Our Lady Help of Christians Church (29–33 Oxford Street and 6–14 Cambridge Street, Epping)<sup>2</sup> and Austral Brickworks (37 Midson Road, Eastwood).<sup>3</sup>

All the study areas identified above have been subject to significant development and redevelopment up to the present, resulting in substantive impacts to their potential historical archaeological resources. As a result of disturbance from development, the properties in the vicinity of the study area were assessed as having low potential for significant historical archaeological remains and relics. The same modern disturbances have likely impacted on historical archaeological remains within the study area.

#### 7.2.2 Phases of Site Development

Section 2 provides a full history of the study area. The following discussion focuses on the potential subsurface archaeological remains such as structural elements, occupational deposits, yards and paths in relation to the historic phases of development within the study area.

The following four main phases of historical development have been identified:

- Phase 1: Land Grants (1794–1874);
- Phase 2: Subdivision (1874–1930);
- Phase 3: Timber Yard and Factories (1930s–1980s); and
- Phase 4: Business Park (1980s–Present).

#### **Phase 1: Land Grants (1794–1874)**

No development was identified within the study area during this phase. Any archaeological remains would have resulted from ephemeral use of the study area, such as timber getting, grazing and other low intensity land uses. The potential for such archaeological remains is considered to be low.

## **Phase 2: Subdivision (1874–1930s)**

It is unknown whether buildings were constructed within the study area during this phase. The 1930 aerial (Figure 2.4) shows what appears to be residential development to the west of the timber yard and factories. The occupation and use of the study area during this phase could have resulted in the creation of sealed artefact deposits, including the creation of rubbish pits, the accumulation of underfloor deposits or artefacts lost or discarded within cesspits and wells. Any of these deposits within the area of the timber yard and factories (Phase 3) are likely to have been lost due to the extreme disturbance resulting from construction and use of the timber yard. Potential for these archaeological remains is considered to be low.

## **Phase 3: Timber Yard and Factories (1930s–1980s)**

The construction and use of the timber yard and factories would have potentially disturbed and destroyed any evidence of previous phases of development within the study area. The 1943 aerial (Figure 2.5) shows significant earthworks and disturbance in the vicinity of the timber yard and factories. Occupation and use of the study area during this phase could have resulted in the creation of sealed artefact deposits, including the creation of rubbish pits in or surrounding yard spaces, artefacts lost or discarded within cesspits and wells. Given previous development within the study area for the current buildings, the potential for such archaeological remains is considered to be low.

## **Phase 4: Business Park (1980s–Present)**

There are no potential archaeological remains from this phase. The demolition of the factories and construction of the Epping Business Park may have disturbed archaeological evidence associated with earlier phases of use.

### **7.2.3 Summary**

Much of the study area's potential historical archaeological resource derives from its subdivision (1874–1930s) and use as timber yards and factories (1930s–1980s). Evidence of land clearing and establishing the timber yard in the 1930s may remain within the study area.

As the sewerage wasn't connected until 1959, the properties would have been designed for self-sufficiency and anticipated structural remains might include wells, cisterns, privies, and outbuildings associated with the timber yard and residential buildings. Features such as wells, cisterns and privies have the potential for sealed artefact deposits resulting from their construction and use. A suite of drains and pipes would have been required to manage the movement of water between these features and may remain within the study area. There is also the potential for sealed artefact deposits unassociated with structural remains across the landscape resulting from dumping activities, including the creation and use of rubbish pits, surface dumping in an area with steep embankments (towards Devlins Creek) or in other areas out of public view.

Each phase of development within the study area would have caused significant damage to the previous phase. Therefore, the overall potential for historical archaeological remains within the study area is considered to be low.

## **7.3 Historical Archaeological Significance**

Archaeological significance refers to the heritage significance of known or potential archaeological remains. In NSW, archaeological remains are managed in accordance with their assessed levels of

significance in line with *Assessing Significance for Historical Archaeological Sites and 'Relics'*, published by the NSW Heritage Branch (now Heritage Division, OEH) in 2009.

This significance assessment specifically considers the historical archaeological resource of the site.

### 7.3.1 NSW Heritage Criteria

The Heritage Council of NSW established seven criteria for consideration in the assessment of heritage significance.<sup>4</sup> The potential historical archaeological resource of the current study area has been assessed against these criteria and our findings are presented in Table 7.1.

**Table 7.1** Assessment of Potential Archaeological Remains within the Study Area Against the NSW Heritage Criteria.

Criteria	Response
<i>(a) an item is important in the course, or pattern, of NSW's cultural or natural history (or the local area)</i>	<p>The subdivision of land for housing in c1874-1930s within the study area has the potential to demonstrated the pattern of development in the Epping region.</p> <p>Epping has a long and important history of providing timber to the developing colony in Sydney. The study area would have been cleared for timber and contained a timber yard from the 1930s to the 1980s.</p> <p>Archaeological remains from the study area have the potential to contribute to an understanding of the timber industry in Epping and could be <b>significant at a local level</b>, depending on their integrity and intactness.</p>
<i>(b) an item has a strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (or the local area)</i>	The potential archaeological remains from the study area are <b>not likely to meet this criterion</b> .
<i>(c) an item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area)</i>	The potential archaeological remains from the study area are <b>not likely to meet this criterion</b> .
<i>(d) an item has strong or special association with a particular community or cultural group in NSW for social, spiritual or cultural reasons (or the local area)</i>	There are no elements of the study area with identified associations with a particular community or cultural group in NSW. Archaeological remains within the study area are unlikely to demonstrate any associations and <b>not likely to meet this criterion</b> .



Criteria	Response
<i>(e) an item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the local area)</i>	<p>The study area has been identified as having low potential for archaeological remains associated with the residential subdivision, timber yard and factories, including structural remains and sealed artefact deposits.</p> <p>Archaeological evidence associated with the residential subdivision has the potential to provide insight into the early development of Epping as well as private lives in the late nineteenth century. Construction and use of the timber yard would have the potential to provide insight into early twentieth-century work and lifeways in Epping and the North Shore of Sydney. Since the site was established for self-sufficiency and not immediately connected to municipal services (water, sewerage) there may be archaeological evidence associated with early twentieth-century lifeways in artefact-bearing features such as rubbish dumps, cesspits and cisterns usually limited to the late nineteenth century in areas nearer Sydney which were connected to services earlier.<sup>5</sup></p> <p>Archaeological deposits and features from the residential subdivision, timber yard and factories have the potential to provide data relevant to examinations of class, gender, ethnicity, diet, consumer patterns and modification of the environment for private and industrial purposes.</p> <p>The research potential of archaeological remains from the residential subdivision, timber yard and factories could be considered <b>significant at a local level</b>, depending on their nature and extent.</p>
<i>(f) an item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the local area)</i>	The potential archaeological remains from the study area are <b>not likely to meet this criterion</b> .
<i>(g) an item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places or cultural or natural environments (or the local area)</i>	The potential archaeological remains from the study area are <b>not likely to meet this criterion</b> .

### 7.3.2 Statement of Archaeological Significance

The subject site has the potential to contain archaeological remains associated with construction and use of the site from c1930 as a timber yard until the 1980s when it was converted for use as an office facility. Substantial or intact archaeological remains resulting from the early years of the timber yard (c1930s-1950s), including associated artefacts, would be of local heritage significance for their historical and research values.

Table 7.2 below presents the potential archaeological features anticipated within the study area, as well as their assessed levels of significance.

**Table 7.2** Potential Archaeological Features, Associated Types of Archaeological Evidence and Assessed Significance.

Phase(s)	Possible Archaeological Remains	Location	Potential	Significance
Phase 1: 1794–1874	<p>Land clearing and farming:</p> <ul style="list-style-type: none"> <li>burnt tree boles, plough marks, field drains associated with land clearing and orcharding practices; and</li> <li>isolated or scattered artefacts associated with agricultural work.</li> </ul>	Entire study area	Low	None

Phase(s)	Possible Archaeological Remains	Location	Potential	Significance
Phase 2: 1874–1930 Phase 3: 1930s–1980s	<p>Former structures:</p> <ul style="list-style-type: none"> <li>outbuildings associated with the timber industry, including stores and working sheds;</li> <li>residential buildings; and</li> <li>outbuildings associated with residences, including stables, coach houses, cesspits, and garages.</li> </ul> <p>Potential remains might include:</p> <ul style="list-style-type: none"> <li>postholes;</li> <li>wall footings; and</li> <li>floor surfaces, etc.</li> </ul>	<p>Whole study area</p> <p>Western edge of study area</p> <p>Western edge of study area</p>	<p>Low</p> <p>Low</p> <p>Low</p>	Local
Phase 2: 1874–1930 Phase 3: 1930s–1980s	<p>Rubbish pits/deposits:</p> <ul style="list-style-type: none"> <li>pits cut and filled with rubbish as a form of expedient disposal;</li> <li>sealed artefact deposits contained within structural features such as cesspits, wells, drains, cisterns, etc;</li> <li>isolated artefacts or surface scatters; and</li> <li>underfloor deposits (associated with unrecorded buildings).</li> </ul>	Whole study area	Low	Local

## 7.4 Potential Impacts and Mitigation Measures

The study area has been assessed as having low potential for significant historical archaeology and ‘relics’, as defined by the Heritage Act. Therefore, the proposed works are unlikely to impact on significant historical archaeological remains or ‘relics’ and no further mitigation would be required.

## 7.5 Endnotes

- <sup>1</sup> GML Heritage Pty Ltd, North West Rail Link EIS 1—Major Civil Construction Works European Heritage Report, 2012.
- <sup>2</sup> GML Heritage Pty Ltd, 29–33 Oxford Street and 6–14 Cambridge Street, Epping Preliminary Heritage Advice, 2017.
- <sup>3</sup> GML Heritage Pty Ltd, Austral Brickworks, Eastwood Archaeological Assessment and Research Design, 2013.
- <sup>4</sup> Heritage Branch Department of Planning, 2009, *Assessing Significance for Historical Archaeological Sites and ‘Relics’*, State of NSW, Heritage Branch, Department of Planning, p 3.
- <sup>5</sup> Heritage Branch Department of Planning, 2009, *Assessing Significance for Historical Archaeological Sites and ‘Relics’*, State of NSW, Heritage Branch, Department of Planning, p 18.

## 8.0 Conclusions and Recommendations

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### 8.1 Conclusions

#### 8.1.1 Findings of the Aboriginal Due Diligence Process

- The site inspection of the study area did not encounter artefacts or other evidence of Aboriginal archaeological sites.
- The environmental context of the land surrounding the study area, predictive models established to ascertain the likelihood of Aboriginal archaeological sites, and levels of previous land disturbance indicate that it is unlikely Aboriginal objects will be located within the study area at 240–244 Beecroft Road, Epping.
- The proposed demolition of the existing office buildings and construction of new residential buildings, with associated earthworks and landscaping, is unlikely to impact on Aboriginal archaeological objects.
- No further permits under the NPW Act would be required and the proponent could proceed with caution.

#### 8.1.2 Historical Archaeology

- The study area has been assessed as having low potential for locally significant historical archaeological remains or 'relics', as defined by the Heritage Act, associated with the subdivision, houses, timber yard and factories.
- The proposed construction of new residential buildings, with associated earthworks and landscaping, is unlikely to impact significant historical archaeological remains and relics.

#### 8.1.3 Built Heritage

The proposed development at 240–244 Beecroft Road is not considered to have an adverse impact on the heritage items in the vicinity of the site. The significant remnant bushland on Beecroft Road, which is immediately adjacent to the Epping Services Facility at the northern part of the site, will not be impacted by the proposed Stage One subdivision works, as no physical works are proposed to the northern part of the site at this stage. The concept proposed for the development site will impede some views of the bushlands from the public domain. However, the major views of the bushland along Beecroft and Edensor Road will be retained.

The proposal will not impact on the listed house at 25 Ray Road, 'Woodlands', due to the physical separation of the two sites and the existing medium density developments along Ray Road which have restricted the visual curtilage of the heritage item. The subject residential development will not further impede views of the heritage item from the public domain.

The heritage items and conservation area in the wider vicinity, to the east and west, are sufficiently separated from the subject site by larger scale development that they will not be impacted by the proposed development.

Any future development of the Epping Services Facility site will need to consider the potential impact on the adjacent remnant bushland, and detailed heritage advice for the development of this lot should be sought during future stages of the development.

Heritage advice should be sought during the development of the design of the residential complex located on the southern allotment to ensure that the final design does not impact on the heritage items in the vicinity. A Heritage Impact Assessment will need to be undertaken for future stages of the development.

## **8.2 Recommendations**

### **8.2.1 Aboriginal Archaeology**

There is low potential for Aboriginal objects or sites within the study area. If Aboriginal sites and/or objects are suspected and/or identified during the process of works, the following Aboriginal unexpected finds protocol should be enacted:

- Stop work order—all works should cease immediately in the area surrounding the suspected objects. Any identified Aboriginal object(s) should be left in situ and not disturbed in accordance with the requirements of Section 89A of the NPW Act. The Office of Environment and Heritage (OEH) should be notified immediately; an archaeologist experienced in the identification of Aboriginal cultural material should inspect the suspected Aboriginal objects to make a positive identification.
- If the suspected items are not Aboriginal in origin or manufacture (as defined under the NPW Act), the location and items should be recorded. Works may continue.
- If the objects are confirmed to be Aboriginal objects, the site should be registered on the AHIMS administered by OEH.
- If the suspected items are Aboriginal objects, an AHIP under Section 90 of the NPW Act would be required before works could continue in the area of the identified objects. The extent of any works exclusion zone would need to be determined through discussion with the OEH and Aboriginal community representatives.
- In the unlikely event that human remains were to be discovered at any time during the works, works must cease immediately in the surrounding area. The findings would need to be reported immediately to the New South Wales Coroner's Office and/or the New South Wales Police.

### **8.2.2 Historical Archaeology**

The study area has low potential for significant historical archaeological remains and is unlikely to contain relics. Implementation of an unexpected finds procedure is recommended:

- If potential historical archaeological remains are identified during ground disturbance, works in the area must cease until they can be assessed by a qualified historical archaeologist.
- If the suspected items are assessed as not being significant historical archaeological remains or relics, works may continue.



- If the suspected items are found to be significant historical archaeological remains or relics, the Heritage Division, OEH, should be notified under Section 146 of the Heritage Act. Further approvals may be required before works could recommence.

### **8.2.3 Built Heritage**

- A heritage specialist should provide design advice for the future stages of development of the permanent Epping Services Facility, which is to be located on the northern part of the site (directly adjacent to the heritage listed remnant bushland of the Beecroft Road Reserve), to ensure adverse impacts on the bushland are minimised or avoided. A detailed heritage impact assessment will need to be undertaken for any future development of that part of the site.
- A heritage specialist should provide design advice for the future stages of the development on the southern allotment to ensure that there are no significant changes made to the design that would impact on the heritage items in the vicinity. A heritage impact assessment will need to be undertaken for future stages of the development.