



706 – 752 Mamre Road, Kemps Creek

Historical Archaeological Assessment

Final Report

Prepared for Plan Project Management

28 November 2025

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

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

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Summary

Biosis Pty Ltd (Biosis) was commissioned by Plan Project Management (PPM) to undertake a historical archaeological assessment (HAA) of an area of land for a proposed State Significant Development (SSD). The project area for the proposed development, 706-752 Mamre Road, Kemps Creek (Lot 10 DP 1280592), constitutes the main development site with areas across the shared boundaries to the east and south (described below) utilised to facilitate roadworks and bulk earthworks:

- Gibb Group site to the East known as 1-22 Bakers Lane, Kemps Creek (Lot 40 in DP 709347).
- GPT Group site to the South known as 754 Mamre Road, Kemps Creek (Lot 180 in DP 1290397).

Additionally, power supply lead-in from Sydney-West Substation is proposed as part of the development, which traverses through multiple landholdings. The study area is located approximately 12 kilometres south-west of Penrith and approximately 40 kilometres west of the Sydney central business district (CBD).

The site is proposed for development under a State Significant Development Application (SSDA) as a data centre campus comprising:

- Approximately 26 shells across four-storeys data centre buildings (4x four shells and 2x five shells), including six technical office buildings, plus a campus office.
- Incoming and internal electrical substations and associated infrastructure.
- Site preparation, including earthworks, stormwater, sewer, roads, and associated infrastructure.

The historical research indicates that the study area was originally granted to Edward Wood in 1805 and from the early- to mid-19th century it was used for agricultural and pastoral purposes by a series of owners and occupants. The residential property in the north-western portion of the study area was first referenced in a newspaper article from 1938, which mentioned a residential building belonging to Nathaniel and Susan Sarah McCook, who occupied the study area during this time. The study area has undergone land clearing and development over time, with several new dams being constructed, and existing dams being expanded throughout the study area. The property is currently used for pastoral grazing and the residential building is unoccupied.

Archaeological heritage values

Two areas of high archaeological potential were identified within the study area associated with the residential and pastoral or agricultural function of the place. These areas are associated with a large shed and residential service pipes for the residential building, and would be represented archaeologically through foundations, footings, building materials, demolition debris, construction debris, ceramic pipes, cut and fill deposits. None of the potential archaeological resources identified within the study area satisfy the criteria for local or State significance.

The remaining features within the study area identified by desktop research and survey are still present and do not constitute archaeological resources.

Impact to archaeology

The study area was assessed as containing areas of high and low archaeological potential. However, the archaeological resources associated with these areas have been assessed to not hold archaeological heritage

significance at a local or State level. As a result, the proposed works will not impact any significant historical archaeology within the study area. Therefore, no mitigation measures to avoid impacts to historically significant archaeology are required for the project.

Recommendations

These recommendations have been formulated to respond to client requirements and the significance of the site. They are guided by the ICOMOS *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance* (Burra Charter) with the aim of doing as much as necessary to care for the place and make it useable and as little as possible to retain its cultural significance.¹

Recommendation 1 No further assessment required

Potential archaeological resources associated with the study area have been assessed as containing no archaeological significance at a local or State level. Therefore, there are no further works required to investigate historical archaeology within the study area.

Should unexpected archaeology be uncovered during works that isn't included in this report, Recommendation 2 must be followed.

Recommendation 2 Implementation of an unexpected finds protocol

Relics are historical archaeological resources of local or State significance and are protected in NSW under the *Heritage Act 1979* (Heritage Act). Should unanticipated relics be discovered during the course of the project, the following steps should be taken:

- If a find is identified, works should stop immediately around the find and the area should be protected.
- The find should be reported to the project manager or supervisor.
- A historical archaeologist should be contacted to identify the find.
- If the find is a relic, a mitigation strategy must be developed and implemented. This could include avoidance of the find, test excavation or other mitigation measures.
- If the find is a relic, notification to Heritage Council under Section 146 of the Heritage Act will be required.

¹ (Australia ICOMOS 2013)

Definitions

Biosis	Biosis Pty Ltd
Burra Charter	<i>The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance</i>
c.	Circa
CBD	Central Business District
CHL	Commonwealth Heritage List
DP	Deposited Plan
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i>
Heritage NSW	Heritage NSW, Department of Climate Change, Energy, the Environment and Water
Heritage Act	<i>Heritage NSW 1977</i>
HHA	Historical Heritage Assessment
Industry and Employment SEPP	<i>State Environmental Planning Policy (Industry and Employment) 2021</i>
LEP	<i>Penrith Local Environmental Plan 2010</i>
NHL	National Heritage List
NSW	New South Wales
PPM	Plan Project Management
SEARs	Secretary's Environmental Assessment Requirements
SHI	State Heritage Inventory
SHR	State Heritage Register
SSD	State Significant Development
Study area	706-752 Mamre Road, Kemps Creek NSW (Lot 10 DP1280592)

1 Introduction

Biosis was commissioned by PPM to undertake a HAA of 706-752 Mamre Road, Kemps Creek NSW (Lot 10, DP1280592) (Figure 1 and Figure 2) (the study area) to support a SSD application for a data centre campus project. The proposed development will be assessed in accordance with Part 4 of the NSW EP&A Act.

This HAA has been prepared to meet the following requirement of the Mamre Road Data Centre Campus Secretary's Environmental Assessment Requirements (SEARs) (SSD-92743706) (Table 1).

Table 1 SEARs (SSD-92743706) - Non-Aboriginal Cultural Heritage

Section	Request Item	Summary response
Non-Aboriginal Cultural Heritage	A non-Aboriginal cultural heritage assessment (including both cultural and archaeological significance) which must detail potential impacts on heritage assets and any proposed management and mitigation measures.	This HAA has been prepared to address this request. The potential impacts to built heritage have been assessed in a separate Statement of Heritage Impact. In consultation with Heritage NSW, Department of Climate Change, Energy, the Environment and Water (Heritage NSW), an updated HAA based on previous assessments was supported (Appendix 1).

1.1 Location of the study area

The study area is located within the suburb of Kemps Creek, Penrith Local Government Area (LGA) (Figure 1). It encompasses 52 hectares of private land. It is currently zoned IN1 - General Industrial and SP2 - Infrastructure.

1.2 Scope of assessment

This report was prepared in accordance with heritage guidelines including, *Historical Archaeology Code of Practice*,² *Assessing Significance for Historical Archaeological Sites and 'Relics'*³ and the Burra Charter⁴. This report provides a heritage assessment to identify if any archaeological heritage items or relics exist within the study area. The significance of these items has been investigated and assessed in order to determine the most appropriate management strategy.

The following is a summary of the major objectives of the assessment:

- Identify archaeological sites within the study area which are already recognised for their heritage value through statutory and non-statutory heritage listings.

² (Heritage Office & Department of Planning 2006)

³ (Heritage Office 2001)

⁴ (Australia ICOMOS 2013)

- Identify and assess the archaeological heritage values associated with the study area. The assessment aims to achieve this objective through providing a brief summary of the principle historical influences that have contributed to creating the phases of the site using resources already available and some limited new research.
- Assess the impact of the proposed works on the archaeology of the study area.
- Recommend measures to avoid or mitigate any negative impacts on the archaeology within study area.

1.3 Proposed works

The proposed development for the study area is a data centre campus (commercial/industrial land use). Its location is shown in Figure 3. The SSD application seeks development consent for the following:

- Approximately 26 four-storey data centre buildings including six technical office buildings, plus a campus office.
- Incoming and internal electrical substations and associated infrastructure.
- Site preparation, including earthworks, stormwater, sewer, roads, and associated infrastructure.

For a detailed description of the proposed development, refer to the Environmental Impact Statement prepared by Willowtree Planning.⁵

1.4 Limitations

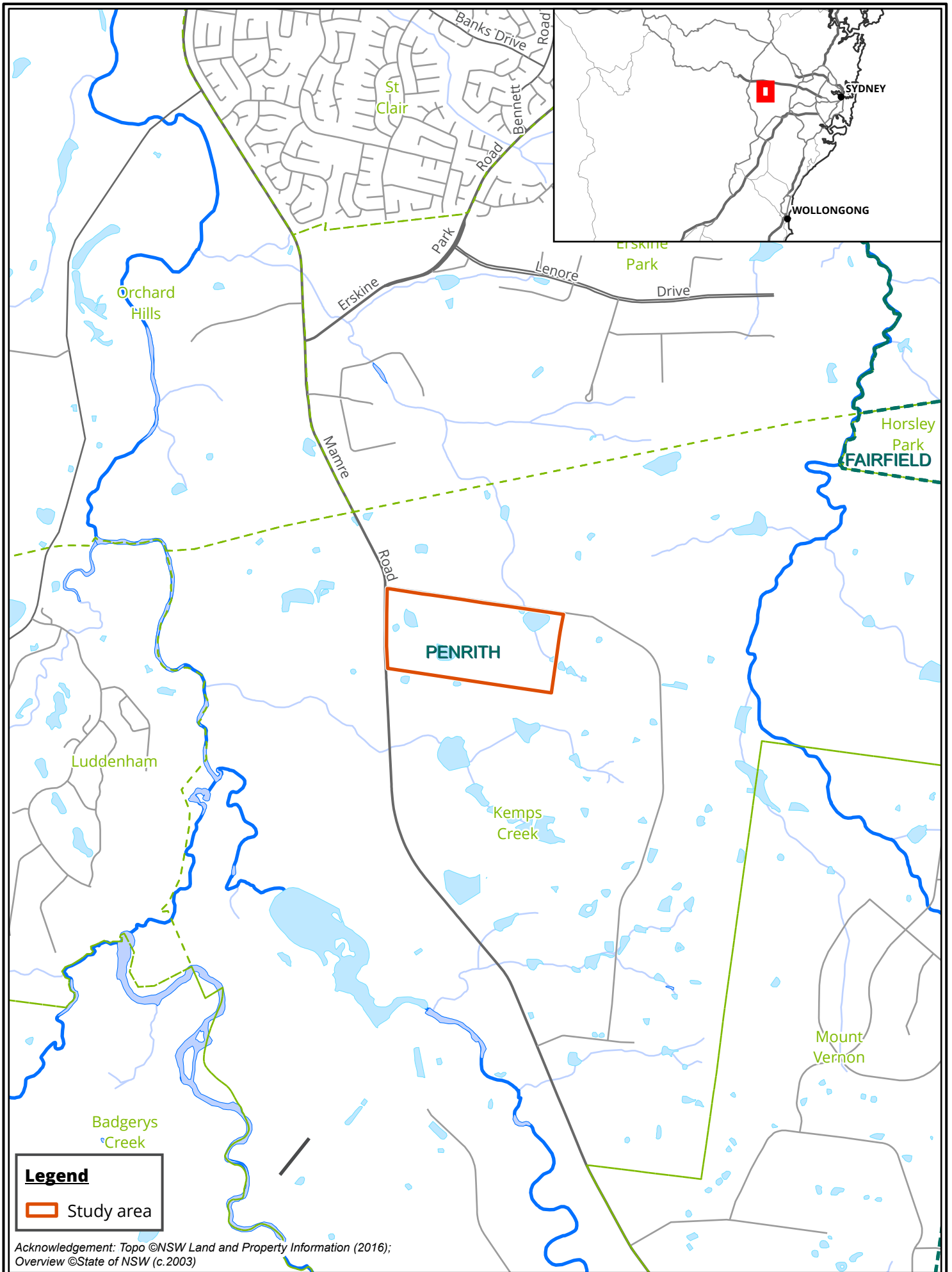
This report is based on historical research and field inspections. It is possible that further historical research or the emergence of new historical sources may support different interpretations of the evidence in this report.

A physical inspection of the study area was previously undertaken on 18 January 2022, attended by Maggie Butcher (Team Leader – Heritage NSW) and Crystal Garabedian (Senior Heritage Consultant). As the footprint of the study area remains same, no physical inspection was undertaken.

Although this report was undertaken to best archaeological practice and its conclusions are based on professional opinion, it does not warrant that there is no possibility that additional archaeological material will be located in subsequent works on the site. This is because limitations in historical documentation and archaeological methods make it difficult to accurately predict what is under the ground.

The significance assessment made in this report is a combination of both facts and interpretation of those facts in accordance with a standard set of assessment criteria. It is possible that another professional may interpret the historical facts and physical evidence in a different way.

⁵ (Willowtree Planning 2025)



Legend

Study area

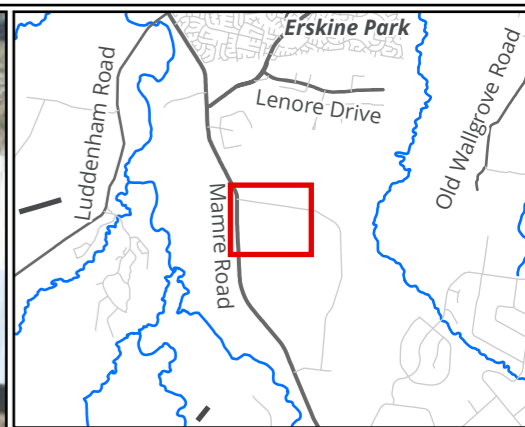
Acknowledgement: Topo ©NSW Land and Property Information (2016);
 Overview ©State of NSW (c.2003)



Figure 1 Location of the study area

Matter: 43278, Date: 15 September 2025,
 Prepared for: SA, Prepared by: OW, Last edited by: williams
 Location: P:\43200s\43278\Mapping\43278_Manre_Rd_ISPT_HHA
 Layout: 43278_HHA_F1_Locality

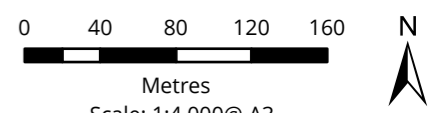
0 250 500 750 1,000
 Metres
 Scale 1:30,000@A4, GDA2020 MGA Zone 56



Legend

- Study area
- Lot

Figure 2 Study area detail

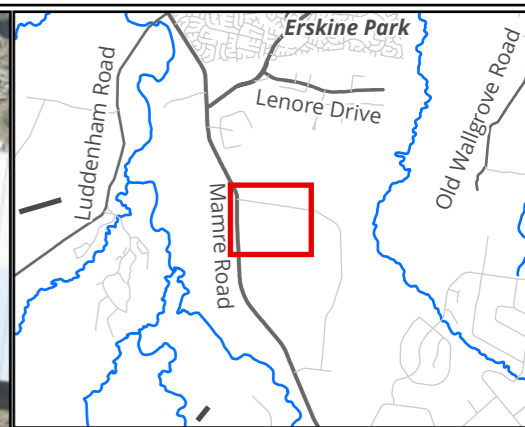


Scale: 1:4,000@ A3
 Coordinate System:
 GDA2020 MGA Zone 56



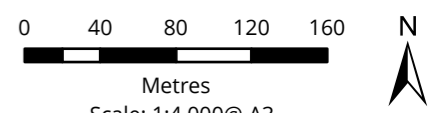
Matter: 43278, Date: 15 September 2025,
 Prepared for: SA, Prepared by: OW, Last edited by: owilliams
 Location: P:\43200s\43278\Mapping\43278_Manre_Rd_ISPT_HHA,
 Layout: 43278_HHA_F2_StudyArea

Acknowledgements: Basemap © Land and Property Information 2016; public/NSW_Imagery; © Department of Customer Service 2020



- Legend**
- Study area
 - Lot

Figure 3 Proposed development



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

biosis
 APEM Group

Matter: 43278, Date: 13 November 2025,
 Prepared for: SA, Prepared by: OW, Last edited by: owilliams
 Location: P:\43200s\43278\Mapping\43278_Manre_Rd_ISPT_HHA,
 Layout: 43278_HHA_F3_ProposedWorks

Acknowledgements: Basemap © Land and Property Information 2016; public/NSW_Imagery; © Department of Customer Service 2020; Campus plan © Greenbox Architecture

2 Statutory framework

In NSW cultural heritage is managed in a three-tiered system: national, state and local. Certain sites and items may require management under all three systems or only under one or two. The following discussion aims to outline the various levels of protection and approvals required to make changes to cultural heritage in the state.

2.1 *Environment Protection and Biodiversity Conservation Act 1999*

The *Environment Protection and Biodiversity Act 1999* (EPBC Act) is the national Act protecting the natural and cultural environment. The EPBC Act is administered by the Department of Climate change, energy, the Environment and Water. The EPBC Act establishes two heritage lists for the management of the natural and cultural environment:

- The National Heritage List (NHL) contains items which have been assessed to be of outstanding significance and define ‘critical moments in our development as a nation’.
- The Commonwealth Heritage List (CHL) contains items which are natural and cultural heritage places that are on Commonwealth land, in Commonwealth waters or are owned or managed by the Commonwealth. A place or item on the CHL has been assessed as possessing ‘significant’ heritage value.

A search of the NHL and CHL did not yield any results associated with the study area.

2.2 *NSW Heritage Act 1977*

Heritage in NSW is principally protected by the *Heritage Act 1977* (Heritage Act) (as amended) which was passed for the purpose of conserving items of environmental heritage of NSW. Environmental heritage is broadly defined under Section 4 of the Heritage Act as consisting of:

those places, buildings, works, relics, moveable objects, and precincts, of State or Local heritage significance.

The Heritage Act is administered by the Heritage Council, under delegation by the Heritage Division, Heritage NSW. The Heritage Act is designed to protect both known heritage items (such as standing structures) and items that may not be immediately obvious (such as potential archaeological remains or ‘relics’). Different parts of the Heritage Act deal with different situations and types of heritage and the Heritage Act provides a number of mechanisms by which items and places of heritage significance may be protected.

2.2.1 *State Heritage Register*

Protection of items of State significance is by nomination and listing on the State Heritage Register (SHR) created under Part 3A of the Heritage Act. A permit under Section 60 of the Heritage Act is required for works on a site listed on the SHR or subject to an Interim Heritage Order, except for that work which complies with the conditions for exemptions to the requirement for obtaining a permit.

Details of which minor works are exempted from the requirements to submit a Section 60 Application can be found in the ‘NSW Government Gazette No 262 of 17 June 2022.’ These exemptions replace all previous exemptions. However, the exemptions do not allow for the disturbance or removal of relics, and

activities/works must not affect archaeological evidence. A Section 60 Application must always be sought to disturb or uncover relics of State significance.

There are no items or conservation areas listed on the SHR within the study area.

2.2.2 Archaeological relics

Section 139 of the Heritage Act protects archaeological 'relics' from being 'exposed, moved, damaged or destroyed' by the disturbance or excavation of land. This protection extends to the situation where a person has 'reasonable cause to suspect' that archaeological remains may be affected by the disturbance or excavation of the land. This section applies to all land in NSW that is not included on the SHR.

Under the Heritage Act, a 'relic' is defined as:

Any deposit, object or material evidence:

(a) Which relates to the settlement of the area that comprises New South Wales, not being Aboriginal settlement, and

(b) Which is of State or Local significance.

It should be noted that not all remains that would be considered archaeological are relics under the Heritage Act. Advice given in the document Archaeological Significance for Sites and Relics⁶ is that a 'relic' would be viewed as a chattel and it is stated that:

In practice, an important historical archaeological site will be likely to contain a range of different elements as vestiges and remnants of the past. Such sites will include 'relics' of significance in the form of deposits, artefacts, objects and usually also other material evidence from demolished buildings, works or former structures which provide evidence of prior occupations but may not be "relics".

If a relic, including shipwrecks in NSW waters (i.e. rivers, harbours, lakes and enclosed bays) is located, the discoverer is required to notify the NSW Heritage Council.

Section 139 of the Heritage Act requires any person who knows or has reasonable cause to suspect that their proposed works will expose or disturb a 'relic' to first obtain an Excavation Permit from the Heritage Council of NSW (pursuant to Section 140 of the Act) unless there is an applicable exception (pursuant to Section 139(4)).

Excavation permits are issued by the Heritage Council of NSW in accordance with Sections 60 or 140 of the Heritage Act. Excavation permits are usually issued subject to a range of conditions. These conditions will relate to matters such as reporting requirements and artefact cataloguing, storage and curation.

Exceptions under Section 139(4) to the standard Section 140 process exist for applications that meet the appropriate criterion. The Section 139(4) self-assessment provides an argument for an exception from the requirement to obtain a Section 140 permit and reflects the nature of the impact and the significance of the relics or potential relics being impacted upon.

If it has been determined an exception is appropriate and, during the course of the development, substantial intact archaeological relics of state or local significance, not identified in the archaeological assessment or statement required by this exception, are unexpectedly discovered during excavation, work must cease in the affected area and the Heritage Office must be notified in writing in accordance with Section 146 of the

⁶ (NSW Heritage Branch, Department of Planning 2009)

Heritage Act. Depending on the nature of the discovery, additional assessment and, possibly, an excavation permit may be required prior to the recommencement of excavation in the affected area.

Projects that are designated as SSD or State Significant Infrastructure are exempt from the requirement for an Excavation Permit under section 139 of the Heritage Act.

2.2.3 Section 170 Heritage and Conservation Registers

Section 170 of the Heritage Act requires that culturally significant items or places managed or owned by Government agencies are listed on departmental Heritage and Conservation Register. Information on these registers has been prepared in accordance with Heritage Division guidelines.

Statutory obligations for archaeological sites that are listed on a Section 170 Register include notification to the Heritage Council in addition to relic's provision obligations. There are no items within the study area that are entered on a State government instrumentality Section 170 Register.

2.3 Environmental Planning and Assessment Act 1979

2.3.1 Local Environmental Plan

The *Penrith Local Environmental Plan 2010* (LEP) contains schedules of heritage items that are managed by the controls in the instrument. As the project is being undertaken as a SSD under Part 4 of the EP&A Act, Department of Planning, Housing and Infrastructure (DPHI) is responsible for approving controlled work.

There are no heritage items or conservation areas listed in the Penrith LEP Schedule 5 located within or adjacent to the study area.

2.3.2 State Environmental Planning Policy (Industry and Employment) 2021

The *State Environmental Planning Policy (Industry and Employment 2021)* (Industry and Employment SEPP) contains schedules of heritage items by the controls in the instrument. These items contain state or regional environmental planning significance.

There are no heritage items listed in the Industry and Employment SEPP Schedule 3 located within or adjacent to the study area.

2.3.3 Mamre Road Precinct Development Control Plan 2021

The Mamre Road Precinct Development Control Plan (Mamre Road Precinct DCP) aims to ensure that non-Aboriginal heritage values are managed appropriately in order to produce conservation outcomes. This includes archaeological and culturally significant areas. The Mamre Road Precinct DCP states that a Heritage Impact Statement (SoHI) is required to accompany any DA for works proposed within the vicinity of a known heritage item that may impact upon an items setting or physical remains.

A review of the Mamre Road Precinct DCP identified that the study area does not contain any items of heritage significance and is not immediately within the vicinity of any heritage items.

3 Historical context

Historical research has been undertaken to identify the land use history of the study area, to isolate key phases in its history and to identify the location of any built heritage or archaeological resources which may be associated with the study area. The historical research places the history of the study area into the broader context of Penrith.

3.1 Topography and resources

The study area is located within the Cumberland Plain, characterised as low lying, gently undulating plains and low hills with a dense drainage net of predominantly northward flowing channels.⁷ Topographically, the study area contains two crest landforms overlooking gently sloping alluvial flats. A first order non-perennial water course transects the north eastern portion of the study area. It is a tributary of South Creek, a sixth order perennial water course located approximately 1.3 kilometres west. A second order non-perennial tributary of South Creek is also present approximately 200 metres south of the study area.

Prior to land clearing, the study area and vicinity would likely have contained plant species such as Forest Red Gum *Eucalyptus tereticornis*, Narrow-leaved Ironbark *Eucalyptus crebra*, and Grey Box *Eucalyptus moluccana*. Hard-leaved Scribbly Gum *Eucalyptus sclerophylla*, Plant species recorded in the study area and within the vicinity include Hickey Wattle *Acacia implexa*, Billy buttons *Craspedia variabilis*, Sprawling Bluebell *Wahlenbergia gracilis*, Catsear *Hypochaeris radicata*, blue trumpet *Brunoniella australis*, and Parramatta Grass *Sporobolus africanus*.

The natural environment supports a range of animal species such as, Australian Wood Duck *Chenonetta jubata*, White-Faced Heron *Egretta novaehollandiae*, Eastern Long-Necked Tortoise *Chelodina longicollis*, Eastern Water Skink *Eulamprus quoyii*, Garden Skink *Lampropholis guichenoti*, Welcome Swallow *Hirundo neoxena*, Western Swampheaven *Porphyrio porphyrio*, as well as arboreal fauna including owls Strigiformes, Ringtailed Possum *Pseudocheirus peregrinus* and Brushtailed Possums *Trichosurus vulpecula*, and gliders *Petauridae*.

3.2 Aboriginal past

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

It is generally accepted that Aboriginal people have inhabited the Australian landmass for the last 65,000 years.⁸ Dates of the earliest occupation of the continent by Aboriginal people are subject to continued revision as more research is undertaken. The timing for the human occupation of the Sydney Basin is still uncertain. While there is some possible evidence for occupation of the region around 40,000 years ago, the earliest known radiocarbon date for the Aboriginal occupation of the Sydney Basin is associated with a

⁷ Clarkson et al. 2017

⁸ Allen & O'Connell 2003

cultural archaeological deposit at Parramatta, which was dated to $30,735 \pm 407$ Before Present (BP).⁹

Archaeological evidence of Aboriginal occupation of the Cumberland Plains indicates that the area was intensively occupied from approximately 4,000 years BP.¹⁰ Such 'young' dates are probably more a reflection of the conditions associated with the preservation of this evidence and the areas that have been subject to surface and sub-surface archaeological investigations, rather than actual evidence of Aboriginal occupation prior to this time.

There is some confusion relating to group names, which can be explained by the use of differing terminologies in early historical references. Language groups were not the main political or social units in Aboriginal life. Instead, land custodianship and ownership centred on the smaller named groups that comprised the broader language grouping. There is some variation in the terminology used to categorise these smaller groups.¹¹ The study area is in the vicinity of three language groups, Dharawal, Gundungurra and the hinterland Darug. These areas are considered to be indicative only and would have changed through time.

After the arrival of European colonisers the movement of Aboriginal people became increasingly restricted. European expansion along the Cumberland Plain was swift and soon there had been considerable loss of land to agriculture. At the same time diseases such as small pox were having a devastating effect on the Aboriginal population. Death, starvation and disease were some of the disrupting factors that led to a reorganisation of the social practices of Aboriginal communities after European contact. The formation of new social groups and alliances were made as Aboriginal people sought to retain some semblance of their previous lifestyle.

3.3 Kemps Creek – historical development

3.3.1 Exploration (1780s to 1800s)

The earliest exploration of the Penrith region was led by Captain Watkin Tench, an officer in the Marine Corps, accompanied by Mr Lowe (surgeon's mate of the *Sirius*), Mr Arndell (assistant surgeon to the Colony), two other marines, and a convict, in 1789. The group reached the Nepean River on 28 June 1789.¹² Later that year, the Penrith Ford was crossed, and in 1791 the course of the Nepean had been explored from the ford to Grose River. By 1791, it had been confirmed that the Hawkesbury and Nepean rivers were the same watercourse; however, each of the names were kept, transitioning from one to the other at the junction with the Grose River.¹³

From 1803, Charles Grimes and James Meehan surveyed areas of the eastern bank of the Nepean River following the sanctioning of settlement in this area by Governor Philip Gidley King, likely in part for the fertile soils associated with the Nepean River floodplain. The portions of land ranged from 40 to 200 acres

⁹ Jo McDonald Cultural Heritage Management Pty Ltd 2005a, Jo McDonald Cultural Heritage Management Pty Ltd 2005b

¹⁰ Dallas 1982

¹¹ Attenbrow 2010

¹² Oehm, A. 2006, Paul Davies Pty Ltd 2007a, pp. 11

¹³ Thorpe 1986, pp. 12

(approximately 16.2 to 81 hectares), with several of 1,000 acres (404.6 hectares) and above. These were granted to officials, free settlers and military staff.¹⁴

3.3.2 Early agricultural development (1800s to 1820s)

In December 1805, Edward Wood received a grant of Portion 52, consisting of 300 acres (approximately 121 hectares), which encompasses the study area.¹⁵ Melville parish maps (Map no. 331 and Map no. 248) note the farm is named 'Kings Wood' owned by Ezekiel Wood, however the Primary applications (no. 17335) originally granted the land to Edward Wood.

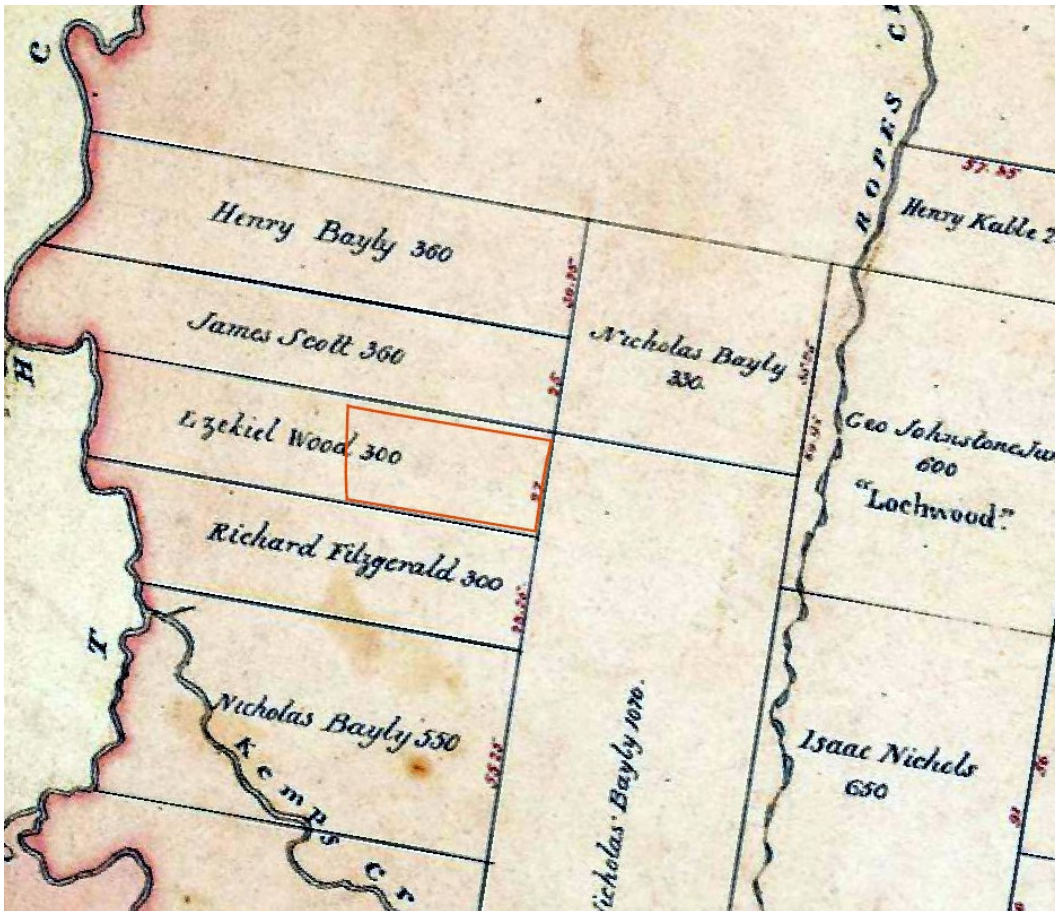


Photo 1 Melville Parish Map (n.d), Map no. 331 (study area in red) (Source: HLRV)

Between 1805 and 1815, around 1699 Europeans settled in the Nepean region, most of whom were of Irish and English heritage and were emancipists or convicts assigned to free settlers or those associated with the government or military.¹⁶ Until the establishment of the Great Western Road around 1815, there was no official passage to the Nepean area. In the same year, Governor Lachlan Macquarie conducted his inspection tour of the region.¹⁷ The Great Western Road had developed into a main route for travel and communication

¹⁴ Paul Davies Pty Ltd 2007a, pp. 11, Thorpe 1986, pp. 12

¹⁵ NSW Land Registry Services, Primary Application 17335; NSW Land Registry Services, Primary Application 7336

¹⁶ Paul Davies Pty Ltd 2007b

¹⁷ Thorpe 1986, pp. 12

for the Nepean region by 1817, and in this year the government town of Penrith was also established. Penrith remained a small, roadside settlement into the 1830s.¹⁸

3.3.3 Pastoral pursuits (1820s to 1910s)

A review of historical documentation indicates the study area was used for agricultural purposes by a series of owners into the 20th century. In May 1826, Portion 52 was indentured into three parts, granted to Henry Bailey, Richard Jones and William Walker.¹⁹ The indenture documentation did not provide specifics of which parts of Portion 52 were provided to the recipients. Fitzgerald, adjacent south of the study area, also leased his land to Henry Bayly in 1836 following what appears to have been an unregistered conveyance to Nicholas Bayly in 1810.²⁰ Nicholas Bayly arrived in Sydney as an ensign in the NSW Corp, and was granted land in Hunter's Hill and Parramatta in 1799. Bayly was also granted land adjacent east of the study area, known as Bayly Park. His son Henry was charged with Bayly Park upon his death.²¹

In 1847, Portion 52 was indentured again into four parts to William Davies, William Salmon Deloitte and William Fanning (first part), Richard Jones (second part), William Walker (third part) and Charles York (fourth part).²² The following month, a further indenture was made between Charles York of one part and John Cosgrove of the other part.²³ The indenture documentation did not provide specific details. The documentation suggests that Jones and Walker were increasing their holdings in the area as part of their pastoral business venture. A deed dating to 1879 records that the northern section of Portion 52 (adjacent north of the study area) was owned by the Hamilton family.²⁴ It may be possible that the Hamiltons acquired this land some time prior to the date of this deed, but evidence of this has not been forthcoming.

An 1892 Crown plan (Photo 3) of the current Mamre Road and an undated auction flyer (Photo 2) note that the study area is partially located within the northern portion of Fleurs Estate, which was established by Richard Jones following his acquisition of Bayly Park in 1826.

¹⁸ Thorpe 1986, pp. 12

¹⁹ NSW Land Registry Services, Book 12 No 452, referenced in Primary Application 17335

²⁰ NSW Land Registry Services, Primary Application 7336

²¹ 1931 "Notable Parramattans." *Cumberland Argus and Fruitgrowers Advocate* (Parramatta, NSW : 1888 - 1950), 15 January, p. 16, <http://nla.gov.au/nla.news-article106843127>, viewed 13 May 2018

²² NSW Land Registry Services, Book 12 No 452, referenced in Primary Application 17335.

²³ NSW Land Registry Services, Book 12 No 452, referenced in Primary Application 17335.

²⁴ NSW Land Registry Services, Book 679 No. 482



Photo 2 Fleurs Estate Auction flyer (n.d.) with the study area in orange (Source: State Library of NSW)

While this was a large estate, Jones was known to have kept a herd of dairy cattle, poultry and pigs, as well as a 2.4 hectare vineyard.²⁵ The Fleurs Estate (Photo 2) and the acquisition of Henry Bayly's land by Richard Jones indicates that the southern part of Portion 52 (located in the southern portion of the study area) was indentured to Henry Bayly in 1826.

In 1892, a road was established from St Mary's municipal boundary to the Orphan School Road, now known as Mamre Road. The road separated Portion 52 into two parts, with the study area located on the eastern side of the road. The Crown plan (Photo 3) for the road shows several fence lines in the area, but no structures are visible in the vicinity of the new road.²⁶ The plan notes that while Cosgrove was the owner of

²⁵ Shineberg 1967

²⁶ NSW Land Registry Services, Crown plan R4288.1603

part of the study area at the time, Nathaniel McCook was occupying the land. No structures appear to have been recorded on the plan.

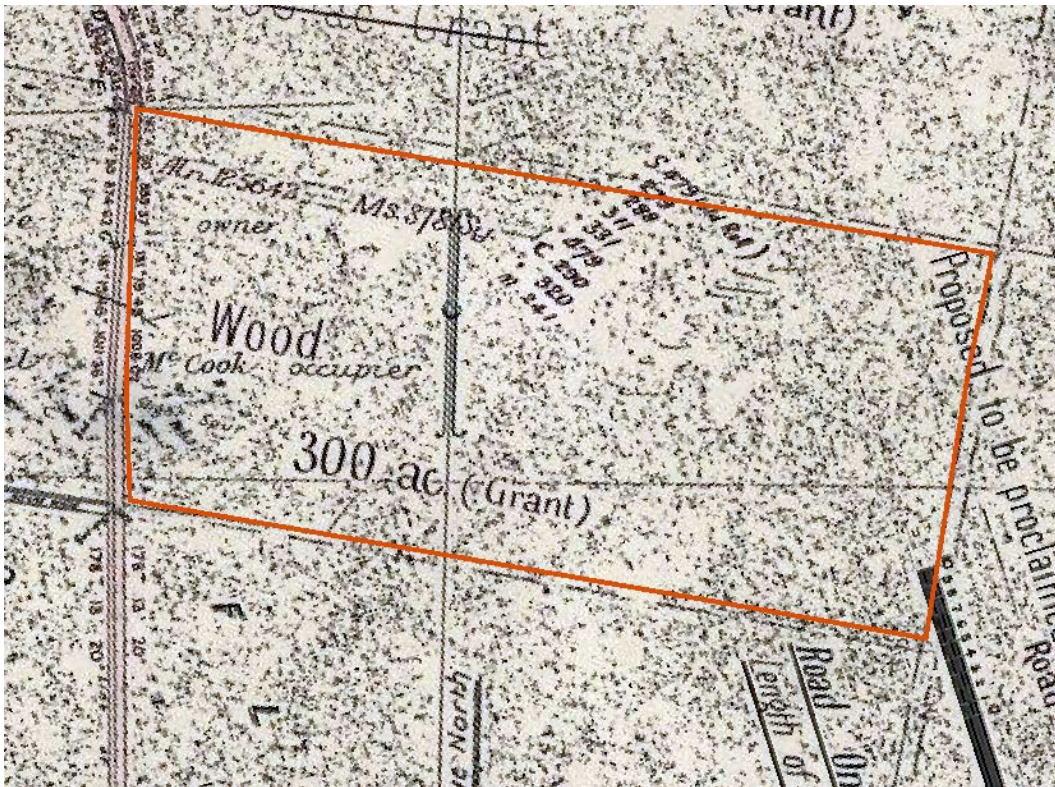


Photo 3 1892 Crown plan of the new road from the boundary of the St Mary's municipality to the Orphan School Road (study area outlined in orange) (Source: NSW Land Registry Services, Crown plan R4288.1603)

3.3.4 Further developments (1910s to present)

A Certificate of Title was granted to William Cosgrove, John Cosgrove, and James Montague in 1912, and finalised in May 1913.²⁷ Portion 52 was transferred during the finalisation period in two part portions: one portion to John Hamilton in October 1912 (located adjacent west of the study area); and the second to Samuel Charles Baker in September 1912 (located within the study area).

The eastern side of Portion 52, owned by Charles Baker, was sold in 1956. The NSW Register Book Volume 7241 Folio 51 lists that the eastern portion 52 (128 acres) was granted to Doris Muriel Clark in February 1957.²⁸ However, another NSW Register Book Vol 7241 Fol 52 lists that the land was granted to an Olive May and Henry Richard Hoyer in February 1957.²⁹ A review of the additions and mortgage information from both register books indicates that the land was granted to Olive May and Henry Richard Hoyer. The land was last granted to Weona Pastoral Co Pty Ltd in 1972.³⁰ and ownership records from this period typically document property boundaries and ownership details but do not record the presence, type, or location of any structures within the land parcel.

²⁷ NSW Land Registry Services, Vol 2365 Fol 39, referenced in Primary Application 17335

²⁸ NSW Land Registry Services, Vol 7241 Fol 51

²⁹ NSW Land Registry Services, Vol 7241 Fol 51; NSW Land Registry Services, Vol 7241 Fol 52

³⁰ NSW Land Registry Services, Vol 10340 Fol 135; NSW Land Registry Services, Vol 7241 Fol 51

Historical aerial imagery allows for modern developments within the study area to be identified. An historical aerial dated to 1947 shows that vegetation clearance and boundary fencing [1] has been constructed within the study area (Photo 4). A residential property [2] and large shed structure [3] has also been constructed within the north-west portion and is surrounded by market garden crops [4]. This indicates that the study area was being used for residential purposes during the ownership of Nathaniel McCook prior to the Hoyer family's purchase of the land in 1957. This is confirmed by a newspaper article from 1938, which details that Nathaniel and Susan Sarah McCook had a residence on Mamre Road.³¹ The remaining land also shows evidence of crop lines. Two dams [5] [6] have been constructed in the west and in the north-east.

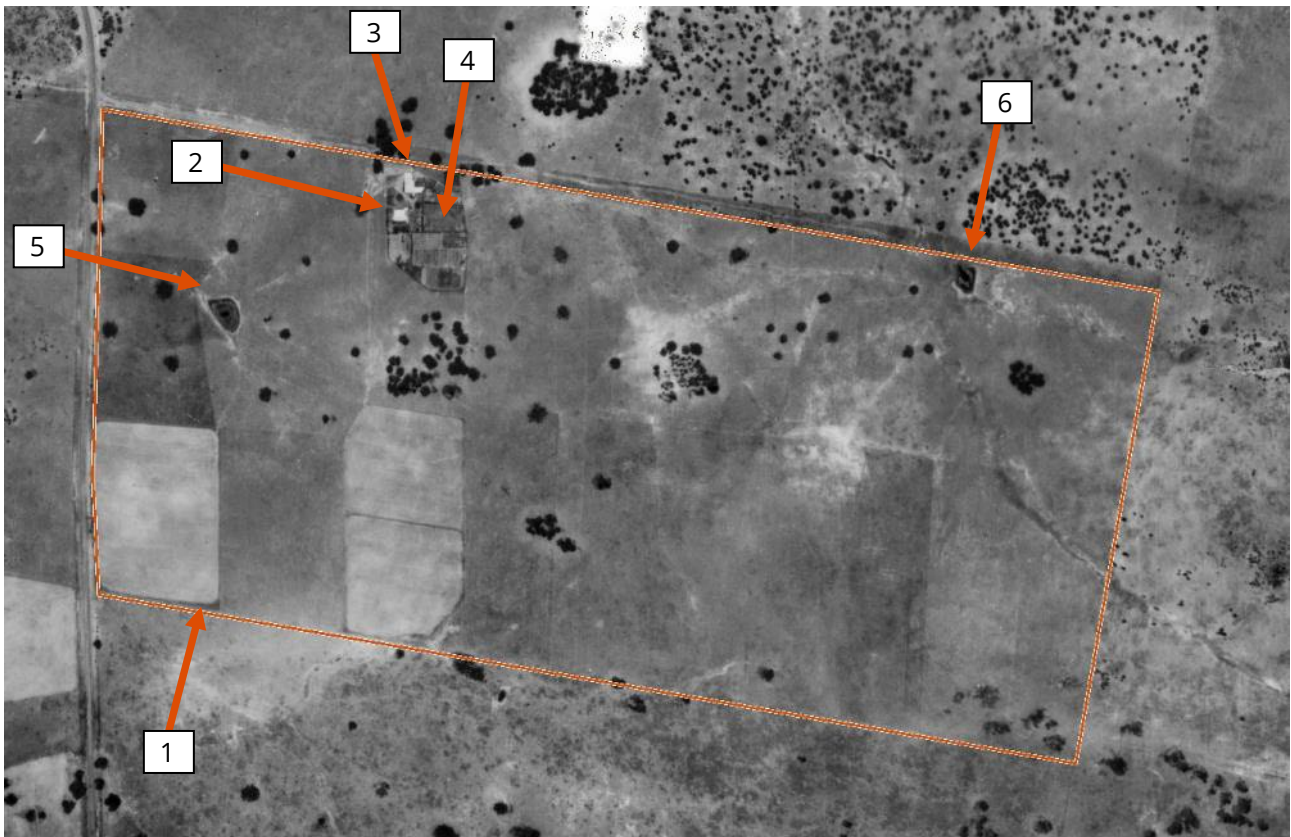


Photo 4 1947 aerial photograph with boundary fencing [1], residential building [2], large shed structure [3], market gardens [4] and dams [5, 6] (study area outlined in orange) (Source: NSW Historical Imagery)

An aerial photograph dated to 1965 shows continued development occurred within the study area (Photo 5). The market gardens surrounding the property have been replaced by gardens or a small orchard [7]. The remaining land continues to be used for agricultural purposes with crop lines visible throughout. Additional dams [8] [9] have been constructed at various locations within the study area.

³¹ (Nepean Times 1938)

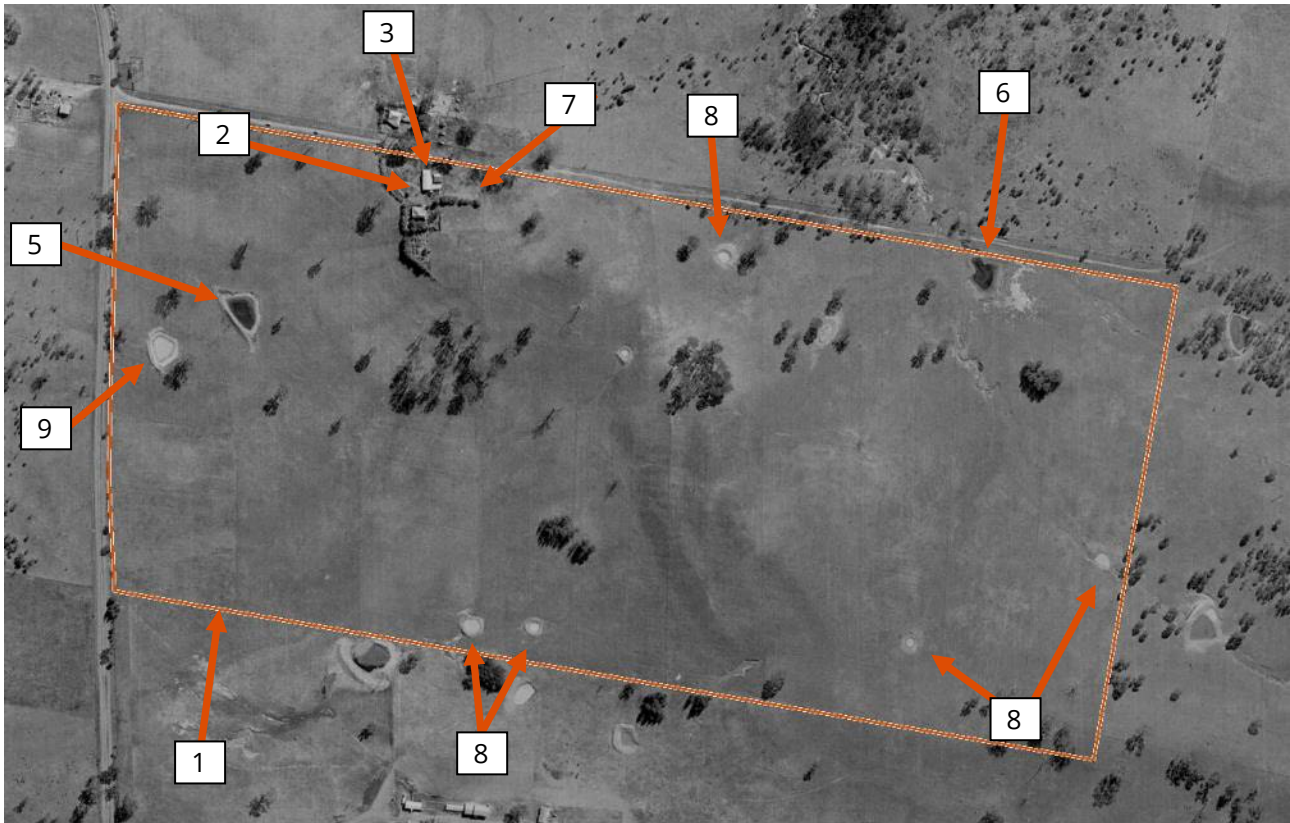


Photo 5 1965 aerial photograph with boundary fencing [1], residential building [2], large shed [3], dams [5] [6], small orchard [7] and additional dams [8] [9] (study area outlined in orange) (Source: NSW Spatial Services)

A 1978 aerial photograph shows the development and expansion of an existing small dam [5] into a large dam [10] in the north east of the study area (Photo 6). A vehicle track is also visible within the area [8]. In the centre of the northern portion of the study area is a trigonometric station [10] placed in 1972, whose official name is Werona TS4720³². Little change is visible within the rest of the study area. By 1991, an additional two large dams [14] [15] were constructed in the west (Photo 7), one as an expansion of an existing small dam [9]. Little development or changes are visible within a current aerial photograph (Photo 8) of the study area, however the large shed structure [3] has been demolished.

³² (Geocaching Australia, n.d.)

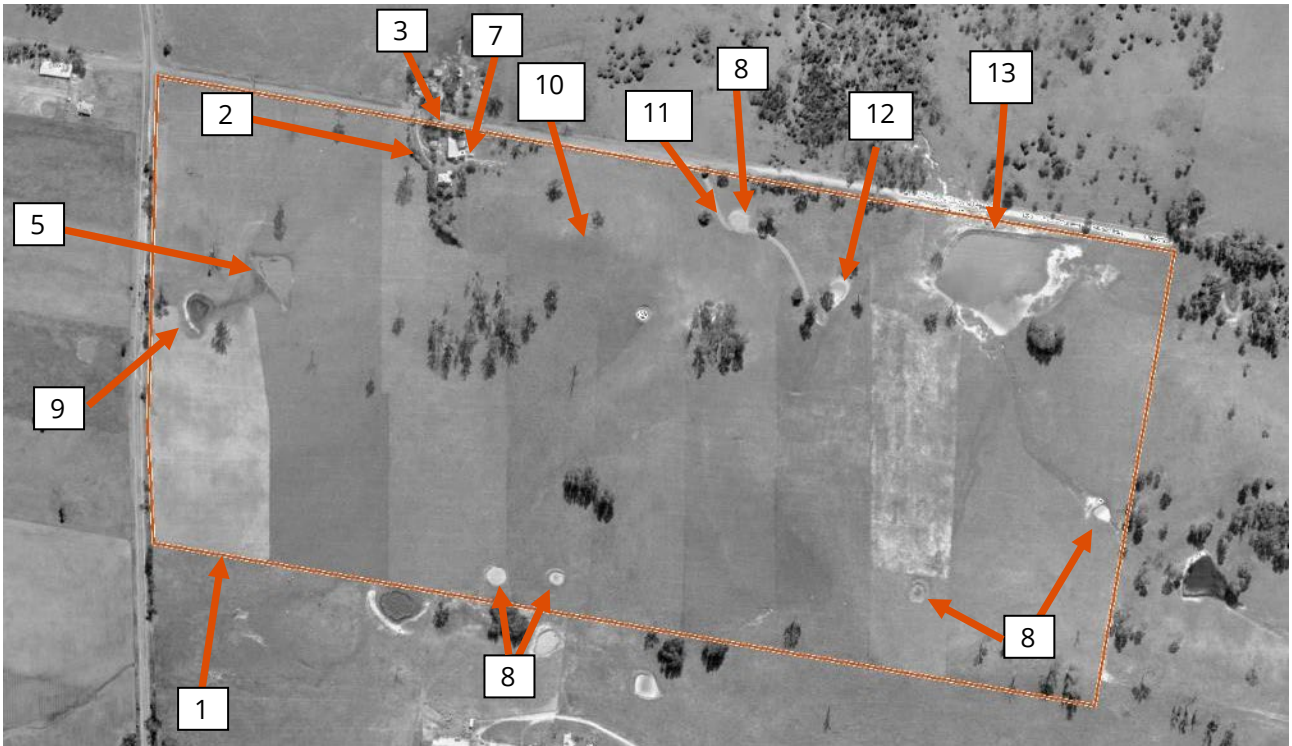


Photo 6 1978 aerial photograph with boundary fencing [1], residential building [2], large shed [3], dams [5] [6] [8] [9] [12], small orchard [7], trigonometric station [10], dirt track [11], expanded dam [13] (study area outlined in orange) (Source: NSW Spatial Services)

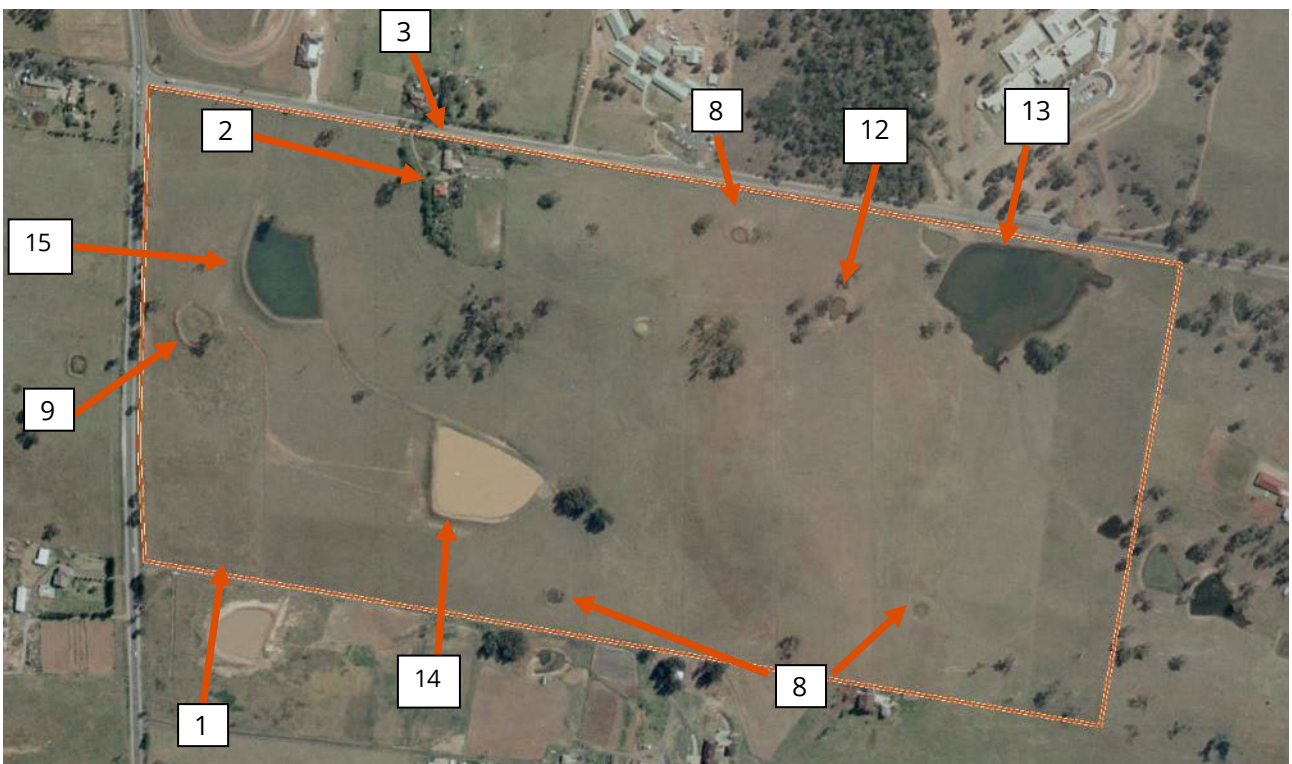


Photo 7 1991 aerial photograph with boundary fencing [1], residential building [2], large shed [3], dams [8, 9], expanded dam [13] and dam with culvert [14] (study area outlined in orange) (Source: NSW Spatial Services)



Photo 8 2022 aerial photograph with boundary fencing [1], residential building [2], dams [8] [9], expanded dams [13] [15] and dam with culvert [14] (study area outlined in orange) (Source: NSW Spatial Services)

3.4 Chronology of the study area

Based upon the historical research presented it is possible to summarise the chronology of the study area, this is presented in Table 2.

Table 2 Chronological development of the study area

No.	Building and development	Possible construction date	Possible demolition date
1	Boundary fencing	Pre-1892	N/A
2	Residential building	Pre-1947	N/A
3	Large shed	Pre-1947	Post 1991
4	Market gardens	Pre-1947	Pre 1965
5	Small dam	Pre-1947	Pre 1978–Post 1965
6	Small dam	Pre-1947	Post 1978–Pre 1991
7	Small orchard	Pre-1965–Post-1947	Pre 1991
8	Small dam	Pre-1965–Post-1947	Pre 1991

No.	Building and development	Possible construction date	Possible demolition date
9	Small dam	Pre-1965	N/A
10	Trigonometric station: Werona TS4720	1972	N/A
11	Vehicle track	Pre-1978–Post-1965	Pre 1991
12	Small dam	Pre-1978	N/A
13	Large dam	Post-1965–Pre-1978	N/A
14	Large dam	Post-1978–Pre-1991	N/A
15	Large dam	Post-1978–Pre-1991	N/A

3.5 Research themes

Contextual analysis is undertaken to place the history of a particular site within relevant historical contexts in order to gauge how typical or unique the history of a particular site actually is. This is usually ascertained by gaining an understanding of the history of a site in relation to the broad historical themes characterising Australia at the time. Such themes have been established by the Australian Heritage Commission³³ and the Heritage Office and are outlined in synoptic form in Historical Themes.³⁴

There are 38 State historical themes, which have been developed for NSW, as well as nine National historical themes. These broader themes are usually referred to when developing sub-themes for a local area to ensure they complement the overall thematic framework for the broader region.

A review of the contextual history in conjunction with the *Western Sydney Thematic History*³⁵ has identified three historical themes which relate to the occupational history of the study area (Table 3).

Table 3 Identified historical themes for the study area

Australian Theme	NSW Theme	Local Theme
Understanding and shaping the land - Land, Water and resource use	Agriculture	No local themes identified. Activities under the NSW Theme of Agriculture may relate to the cultivation and rearing of plant and animal species, usually for commercial purposes, can include aquaculture.
	Pastoralism	No local themes identified. Activities under the NSW Theme of Pastoralism may be associated with the breeding, raising, processing and distribution of livestock for human use.
Building a Nation - Settlement: pre and post Federation	Domestic life	No relevant local theme. Activities under the NSW Theme of Domestic Life may be associated with creating, maintaining, living in and working around houses and institutions.

³³ (Australian Heritage Council 2022)

³⁴ (NSW Heritage Council 2001)

³⁵ (Kass 2005)

4 Physical inspection

A physical inspection of the study area was previously undertaken on 18 January 2022, attended at the time by Maggie Butcher (Team Leader – Heritage NSW) and Crystal Garabedian (Senior Heritage Consultant). The principal aims of the survey were to identify areas of potential historical archaeology within the study area and areas of disturbance which would have impacted the potential archaeological resources identified in the background research.

The study area comprises approximately 52 hectares of private land, previously used for horticultural and animal grazing. Three structures were targeted for inspection based on the background research undertaken for the study area: a trigonometric station [10] (Photo 9); brick culvert associated with a large dam [14] (Photo 12); and residential building and associated structures [2] [3] (Photo 13).

The trigonometric station [10] was constructed in 1972 by the NSW Department of Lands and is located on the highest peak of the study area, with an elevation of 85 metres.³⁶ The top component of the trigonometric station [10] had broken and was lain next to the concrete pillar (Photo 9). The entire study area can be viewed from the trigonometric station and the views extend beyond the boundaries of the study area into the neighbouring lots and surrounding landscape (Photo 10 and Photo 11).



Photo 9 Trigonometric station [10], facing north

³⁶ (Geocaching Australia, n.d.)



Photo 10 View from trigonometric station [10], facing north-east



Photo 11 View from trigonometric station [10], facing south-east

The brick culvert was located on the northern side of the large dam [14] in the southern portion of the study area (Photo 7). It comprised machine-made bricks and was in a good condition, being almost completely intact (Photo 12). A closer inspection of the culvert could not be made as it was surrounded by water.



Photo 12 Brick culvert and dam [14], facing south-west

The residential building [2] was positioned in the north-western portion of the study area (Photo 4) and the exterior comprised fibro cladding (Photo 13). The structural integrity of the building was highly compromised, with several of its support structures and wooden features being deteriorated. As a result the investigation of the house could only be conducted from the outside. The ceilings inside the building and under the veranda had collapsed, several of the interior and exterior walls had sizable holes in them and the tongue in groove floorboards were broken and deteriorated in multiple places (Photo 14, Photo 15). The internal rooms were in very poor condition with little being preserved, and the openings in the building displayed the insulation and asbestos that was contained within the structure (Photo 15). The house was suspended on brick piers (Photo 16), increasing in height towards the west as the house was built on a gentle slope. Attached to the north-east corner of the house was the remnants of a room with tiles attached to approximately half of the height of the two remaining walls (Photo 17).



Photo 13 Residential building [2], facing west



Photo 14 Exterior view of residential building [2] showing holes in walls, fibro cladding and asbestos (as indicated by orange arrow)



Photo 15 Interior view of residential building [2] showing condition and exposed insulation and asbestos



Photo 16 Brick piers under residential building [2], facing north-east



Photo 17 Exterior view of residential building [2] showing remains of tiled room, facing south

At the south-west corner of the residential building [2], travelling towards the south-west of the study area were several sewerage clay pipes, some still positioned in the ground and others scattered in the vicinity (Photo 18) which led into a concrete septic tank (Photo 19). Located at southern side of the house was a pile of machine-made bricks of varying sizes (Photo 20) which was surrounded by other building debris including floorboards, pieces of metal and stray clay pipes (Photo 21).



Photo 18 Clay pipes leading away from and near south-west corner of residential building [2]



Photo 19 Concrete septic tank



Photo 20 Brick pile located at southern side of the residential building [2]



Photo 21 Building debris and clay pipes located at southern side of the residential building [2]

To the north-east of the residential building [2] was a large rendered, machine-made brick water tank which had been heavily damaged (Photo 22). The water tank had been partially filled by soil, rubbish and debris including corrugated sheets, metal bars, rubber tyres, and various pieces of plastic (Photo 23). Adjacent to the water tank were the concrete foundations of a demolished structure and pieces of building materials, including rusted, metal sheets and machine-made bricks (Photo 24). These are likely to be the foundations of the large shed [3] (Photo 24, Photo 25, Photo 26). Near the northern border of the study area was a fence made of rusted metal sheets (Photo 27). The fence continued east towards an animal enclosure made with metal bars and gates (Photo 28).



Photo 22 Brick water tank, facing north-east



Photo 23 Internal view of brick water tank



Photo 24 Concrete foundations and water tank in north-western portion of study area, facing south-east



Photo 25 Concrete foundations adjacent to water tank in north-western portion of study area, facing east



Photo 26 Machine-made bricks near concrete foundations



Photo 27 View towards metal sheet fence, facing north



Photo 28 View towards animal enclosure, facing east

5 Archaeological assessment

The potential archaeological resource relates to the predicted level of preservation of archaeological resources within the study area. Archaeological potential is influenced by the geographical and topographical location, the level of development, subsequent impacts, levels of onsite fill and the factors influencing preservation such as soil type. An assessment of archaeological potential has been derived from the historical analysis undertaken during the preparation of this report.

Archaeological potential differs from archaeological research potential (Section 6) in that the presence of an archaeological resource (i.e. archaeological potential) does not mean that it can provide any additional information that increases our understanding of a site or the past (i.e. archaeological research potential).

5.1 Archaeological resource

This section discusses the archaeological resource within the study area. The purpose of the analysis is to outline what archaeological deposits or structures are likely to be present within the study area.

The historical context presented in this report indicates that the study area was developed for agricultural activities in the early-19th century by being cleared multiple times and having fences and gates installed to keep cattle, and may contain remnant agricultural remains. These include, but are not limited to, evidence of land clearing, plough lines associated with market gardens, postholes, fence lines [1] and agricultural tools.

While the original land grant was dated to 1805, little evidence was found to suggest that residential structures were constructed within the study area during these early stages. Aerial imagery from 1947 indicated that there was a residential building [2] in the study area at this time. A newspaper article from 1938 referenced a residential building belonging to Nathaniel and Susan Sarah McCook, who occupied the study area during this time. Upon inspection, the residential building [2] contained substantial amounts of asbestos. Asbestos cement materials were first developed in the 1920s and were widely used to construct residential buildings during the mid-1940s, until they were phased out in the late 1980s.³⁷ This suggests that the construction date of the residential building [2] occurred post-1920. This evidence in addition with an absence of early archaeological materials within the study area strongly suggests that, apart from boundary fencing [1], the residential building [2] is the earliest archaeological resource. This portion of the study area may contain archaeological remains in the form of foundations, footings, building materials, construction and demolition debris and services.

Adjacent to the residential building [2] was the water tank and the concrete foundations of the large shed [3] that existed until the late-20th to early-21st century. Whilst from the aerial imagery it can be discerned that this building was a shed or shed-like structure, it is unclear what its specific purpose or function may have been, as there was no other evidence or physical remains of the pre-existing building to suggest this. Potential archaeological remains of the concrete foundations include building materials and demolition debris. The water tank was partially filled with sediment, discarded tyres, metal and other construction debris, so it was unclear what was located at the base of this structure. Potential archaeological remains of the water tank include discarded occupational material, construction and demolition debris. Both the concrete foundations and the water tank comprised machine-made bricks. This brick manufacturing technique was introduced to NSW in the 1890s, and was commonly used in construction throughout the state. As a result, it

³⁷ (Department of Health 2003)

is likely that these structures were built post-1890. Potential archaeological resources of the water tank include construction and demolition debris.

The large dam [14] with the brick culvert was constructed after 1991, as evident from historic aerial imagery (Photo 7). The culvert associated with the large dam [14] was built with bricks that appear to be of the typical machine-made bricks widely used in construction from the late-19th and early-20th century. This dam was the youngest of those constructed within the study area, with the oldest dams being the two small dams [5] [6] dating to pre-1947. These two smaller dams were redeveloped and expanded into two larger dams [13] [15]. Archaeological resources associated with all dams within the study area would comprise cut and fill deposits.

The trigonometric station [10], although damaged, was still extant. Archaeological resources associated with this structure would include a footing of concrete or brick, and an associated cut and fill deposit. The market garden [4] and small orchard [7] are likely to be represented archaeologically through cut and fill deposits, and ridges and furrows. The small orchard [7] may have also been fenced, which would result in post holes. Archaeological resources associated with the vehicle track [11] would comprise cut and fill deposits, as well as compacted deposits and drainage trenches.

5.2 Integrity of sub-surface deposits

The integrity of any subsurface deposits of the potential archaeological resources identified in Section 5.1 is summarised below. Classifications of the designations used to assess integrity of subsurface deposits are defined in Table 4 below.

Table 4 Definitions of designations of subsurface deposit integrity

Integrity designation	Definition
Excellent	Potential archaeological resources would have been not at all affected by disturbances. They are likely to still be <i>in situ</i> and in very good condition.
Good	Potential archaeological resources would have been minimally affected by disturbances. They are likely to still be <i>in situ</i> and in a good condition.
Fair	Potential archaeological resources would have likely been impacted by disturbances but are still partially in place and not wholly destroyed.
Poor	Potential archaeological resources have been impacted by disturbances to a degree that has likely entirely destroyed or disrupted them. Little to none of the potential archaeological resource is likely to remain.

The study area has been subjected to extensive land disturbances since 1826 which would have impacted the integrity of sub-surface deposits. Land clearing and pastoral and agricultural activities may have removed evidence of fence lines, post holes and market gardens. It is possible that truncated remains of fence lines could still be present. However, these were not identified during the survey.

The north-western portion of the study area has been subjected to land disturbances over the course of its use. These include land clearing for residential development, gardening and erosion and would have impacted the integrity of sub-surface deposits. The residential building [2] was still extant, but in a very poor condition and ruinous state. The age of the house, deduced from the historical documentation, materials used and imagery, suggests that underfloor deposits would not be found beneath the residence. The foundations and footings of the residential building [2] and the shed structure [3] were observed during the archaeological survey and appeared intact with a degree of degradation that is typical of exposed brick and concrete material (Photo 16 and Photo 25).

Remnants of services were identified above the ground surface in the form of clay sewerage pipes, which led to the septic tank (Photo 18). These were exposed due to post depositional processes, including soil erosion, and it is likely that similar processes impacted potential sub-surface deposits containing evidence of other services. However, this was not observed during the archaeological survey. The septic tank was built to be partially above ground, with a large portion of it extending below the ground surface; this is seen through the open end of the pipe (Photo 21). No disturbances in this area were evident during the archaeological survey outside of those associated with typical soil erosion. Therefore, it is likely that any potential sub-surface deposits would be intact.

The construction of the water tank, septic tank and the dams [5] [6] [8] [9] [12] [13] [14] [15] would have involved bulk excavation and soil displacement in the location of the market garden [4] and small orchard [7]. This development would have removed or displaced evidence of discarded occupational material, or construction or demolition debris.

5.3 Summary of archaeological potential

Through an analysis of the above factors a number of assumptions have been made relating to the archaeological potential of the study area, these are presented in Table 5 and Figure 4.

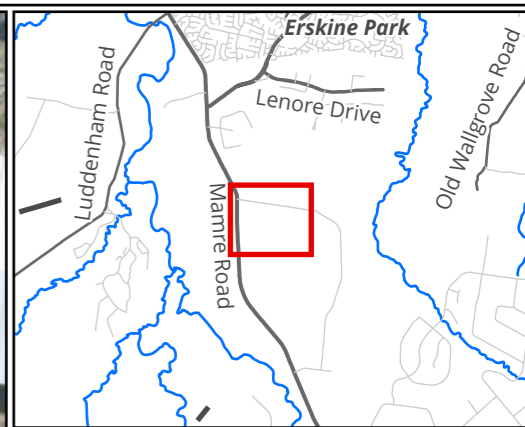
The assessment of archaeological potential has been divided into three categories:

- **High archaeological potential:** based upon the documentary evidence and field investigation there is a high degree of certainty that archaeological features will occur within the study area.
- **Moderate archaeological potential:** based upon the documentary evidence and field investigation it is probable that archaeological features could be present within the study area.
- **Low archaeological potential:** based upon the documentary evidence and field investigation it is unlikely that archaeological features could be present within the study area.

Table 5 Assessment of archaeological potential

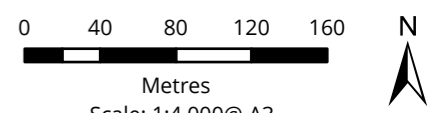
Designation	Description	Probable feature(s)	Possible construction date	Possible demolition date	Archaeological potential
1	Boundary fencing	Post holes	Pre-1892	N/A	Still extant
2	Residential building	Foundations, footings, occupational deposits, building materials, demolition debris, construction debris, services	Pre-1947	N/A	Still extant
3	Large shed	Foundations, footings, building materials, demolition debris, construction debris	Pre-1947 (demolished post-1991)	Post-1991	High
4	Market gardens	Plough lines, cut and fill deposits	Pre-1947	Pre-1965	Low

Designation	Description	Probable feature(s)	Possible construction date	Possible demolition date	Archaeological potential
5	Small dam	Cuts and fills	Pre-1947	Pre1978–Post-1965	Low
6	Small dam	Cuts and fills	Pre 1947	Post-1978–Pre-1991	Low
7	Small orchard	Post holes, fence lines, cut and fill deposits	1947–1965	Pre-1991	Low
8	Small dam	Cuts and fills	1947–1965	N/A	Still extant
9	Small dam	Cuts and fills	Pre 1965	N/A	Still extant
10	Trigonometric station: Werona TS4720	Brick or concrete footing and associated cut and fill deposit	1972	N/A	Still extant
11	Vehicle track	Compact surfaces	1965–1978	Pre 1991	Low
12	Small dam	Cuts and fills	Pre 1978	N/A	Still extant
13	Large dam	Cuts and fills	1965–1978	N/A	Still extant
14	Large dam	Cuts and fills, brick culvert	1978–1991	N/A	Still extant
15	Large dam	Cuts and fills	1978–1991	N/A	Still extant
-	Water tank, septic tank	Building and occupational materials, and construction and demolition debris	Pre 1947	N/A	Still extant
-	Residential services pipes	Ceramic pipes, cut and fill deposits	Pre 1947	Post-1991	High



- Legend**
- Study area
 - Lot
- Archaeological potential**
- Low
 - High

Figure 4 Assessment of archaeological potential



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



Matter: 43278, Date: 09 October 2025,
 Prepared for: CLA, Prepared by: OW, Last edited by: owilliams
 Location: P:\43200s\43278\Mapping\43278_Manre_Rd_ISPT_HHA,
 Layout: 43278_HHA_FS_ArchPotential

6 Significance assessment

An assessment of heritage significance encompasses a range of heritage criteria and values. The heritage values of a site or place are broadly defined as the ‘aesthetic, historic, scientific or social values for past, present or future generations’³⁸. This means a place can have different levels of heritage value and significance to different groups of people.

A detailed set of criteria for assessing the State’s cultural heritage was published by the (then) NSW Heritage Office. These criteria are divided into two categories: nature of significance, and comparative significance.

Heritage assessment criteria in NSW fall broadly within the four significance values outlined in the Burra Charter. The Burra Charter has been adopted by state and Commonwealth heritage agencies as the recognised document for guiding best practice for heritage practitioners in Australia. The four significance values are:

- Historical significance (evolution and association).
- Aesthetic significance (scenic/architectural qualities and creative accomplishment).
- Scientific significance (archaeological, industrial, educational, research potential and scientific significance values).
- Social significance (contemporary community esteem).

The NSW Heritage Office issued a more detailed set of assessment criteria to provide consistency with heritage agencies in other States and to avoid ambiguity and misinterpretation. These criteria are based on the Burra Charter. The following SHR criteria were gazetted following amendments to the *Heritage Act 1977* (Heritage Act) that came into effect in April 1999:

- **Criterion (a):** an item is important in the course, or pattern, of NSW’s cultural or natural history (or the cultural or natural history of the local area).
- **Criterion (b):** an item has 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 cultural or natural history of the local area).
- **Criterion (c):** an item is important in demonstrating the aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area).
- **Criterion (d):** an item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons.
- **Criterion (e):** an item has potential to yield information that will contribute to an understanding of NSW’s cultural or natural history (or the cultural or natural history of the local area).
- **Criterion (f):** an item possesses uncommon, rare or endangered aspects of NSW’s cultural or natural history (or the cultural or natural history of the local area).
- **Criterion (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 a class of the local area’s cultural or natural places; or cultural or natural environments.

³⁸ (Heritage Office 2001)

6.1 Levels of heritage significance

Items, places, buildings, works, relics, movable objects or precincts can be of either local or state heritage significance, or have both local and state heritage significance. Places can have different values to different people or groups.

Local heritage items

Local heritage items are those of significance to the local government area. In other words, they contribute to the individuality and streetscape, townscape, landscape or natural character of an area and are irreplaceable parts of its environmental heritage. They may have greater value to members of the local community, who regularly engage with these places and/or consider them to be an important part of their day-to-day life and their identity. Collectively, such items reflect the socio-economic and natural history of a local area. Items of local heritage significance form an integral part of the State's environmental heritage.

State heritage items

State heritage items, places, buildings, works, relics, movable objects or precincts of state heritage significance include those items of special interest in the state context. They form an irreplaceable part of the environmental heritage of NSW and must have some connection or association with the state in its broadest sense.

6.2 NSW Heritage Criteria for Assessing Significance related to Archaeological Sites and Relics

Whilst the 'research potential' of an archaeological site and its component 'relics' is clearly a key assessment criterion for archaeological significance, a research only approach may limit the consideration of an archaeological site's other heritage values. Archaeological significance may be linked to other significance categories especially where sites were created as a result of a specific historic event or decision, or when sites have been the actual location of particular incidents, events or occupancies.³⁹ The following criteria has been developed by the Heritage Council of NSW in order to properly assess the significance of archaeological sites and relics.

Archaeological Research Potential (NSW Heritage Criterion E)

Archaeological research potential refers to the ability of archaeological evidence to provide information about a site that could not be derived from any other source and which contributes to the archaeological significance of that site.

The research potential of a site is also affected by the integrity of the archaeological resource within a study area. If a site is disturbed, then vital contextual information that links material evidence to a stratigraphic sequence may be missing and it may be impossible to relate material evidence to activities on a site. This is generally held to reduce the ability of an archaeological site to answer research questions.

Assessment of the research potential of a site also relates to the level of existing documentation of a site and of the nature of the research done so far (the research framework), to produce a 'knowledge' pool to which research into archaeological remains can add.

³⁹ (NSW Heritage Branch, Department of Planning 2009)

Background research identified two national historical themes relevant to the study area that correlated to three state themes. Table 6 identifies the NSW historical themes that are relevant to the study area.

Table 6 Identified historical themes for the study area

Australian Theme	NSW Theme	Local Theme
Understanding and shaping the land - Land, Water and resource use	Agriculture	No local themes identified. Activities under the NSW Theme of Agriculture may relate to the cultivation and rearing of plant and animal species, usually for commercial purposes, can include aquaculture.
	Pastoralism	No local themes identified. Activities under the NSW Theme of Pastoralism may be associated with the breeding, raising, processing and distribution of livestock for human use.
Building a Nation - Settlement: pre and post Federation	Domestic life	No relevant local theme. Activities under the NSW Theme of Domestic Life may be associated with creating, maintaining, living in and working around houses and institutions.

Associations with individuals, events or groups of historical importance (NSW Heritage Criteria A, B & D).

Archaeological remains may have particular associations with individuals, groups and events which may transform mundane places or objects into significant items through the association with important historical occurrences.

Aesthetic or technical significance (NSW Heritage Criterion C)

Whilst the technical value of archaeology is usually considered as 'research potential' aesthetic values are not usually considered to be relevant to archaeological sites. This is often because until a site has been excavated, its actual features and attributes may remain unknown. It is also because aesthetic is often interpreted to mean attractive, as opposed to the broader sense of sensory perception or 'feeling' as expressed in the Burra Charter.

Nevertheless, archaeological excavations which reveal highly intact and legible remains in the form of aesthetically attractive artefacts, aged and worn fabric and remnant structures, may allow both professionals and the community to connect with the past through tangible physical evidence

Ability to demonstrate the past through archaeological remains (NSW Heritage Criteria A, C, F & G).

Archaeological remains have an ability to demonstrate how a site was used, what processes occurred, how work was undertaken and the scale of an industrial practice or other historic occupation. They can demonstrate the principal characteristics of a place or process that may be rare or common.

A site may best demonstrate these aspects at the time of excavation. It may also be possible to explain the nature of the site and demonstrate past practices via public interpretation either before, during, or after excavation.

6.3 Significance assessment

Most of the features identified in the historical background are still present throughout the study area and do not represent an archaeological resource. The significance assessment for the potential historical archaeology in the study area from features that have been removed is summarised in Table 7.

Table 7 Significance assessment for historical archaeological features within the study area

Designation	Description	Potential archaeological remains	NSW Heritage Criteria				Conclusions
			E	A, B & D	C	A, C, F & G	
3	Large shed	Foundations, footings, building materials, demolition debris, construction debris	N/A	N/A	N/A	N/A	<p>The archaeological resources associated with the large shed would not contribute further to our understanding of building techniques from this time. The building techniques and materials, and pastoral and agricultural processes are typical of this region and are thoroughly researched and well understood. There were no features of these structures to differentiate them from similar structures of this nature built during this period.</p> <p>An assessment of the readily available historical information has not identified a strong or special association with the life or works of a person or group of persons. The structural remnants of the large shed as observed during the physical inspection do not indicate they hold aesthetic or technical significance.</p> <p>While the official date of construction of the large shed cannot be definitively determined, the background research and physical inspection has concluded that the buildings were constructed prior to 1947. Given the known evidence of the structure and the wider occupation of the site, the resources of this structure would not demonstrate the use of the study area.</p> <p>The archaeological resources associated with the large shed do not hold heritage significance at a local or State level.</p>
-	Residential services pipes	Ceramic pipes, cut and fill deposits	N/A	N/A	N/A	N/A	<p>The archaeological resources associated with the residential service pipes would not contribute further to our understanding of water and sewer management from this time. The infrastructure and materials, are typical of this region and are thoroughly researched and well understood. There were no features of these structures to differentiate them from similar structures of this nature built during this period.</p> <p>An assessment of the readily available historical information has not identified a strong or special association with the life or works of a person or group of persons. The residential service pipes as observed</p>

Designation	Description	Potential archaeological remains	NSW Heritage Criteria				Conclusions
			E	A, B & D	C	A, C, F & G	
							<p>during the physical inspection do not indicate they hold aesthetic or technical significance.</p> <p>While the official date of construction of the residential service pipes cannot be definitively determined, the background research and physical inspection has concluded that the buildings were constructed prior to 1947. Given the known evidence of the structure and the wider occupation of the site, the resources of this structure would not demonstrate the use of the study area.</p> <p>The archaeological resources associated with the residential service pipes do not hold heritage significance at a local or State level.</p>

6.3.1 Statement of significance

The archaeological resources identified within the study area are reflective of its use for residential, agricultural and pastoral purposes throughout its historical tenure. The earliest structures and materials within the study area have either undergone disturbances from demolition, or they are still extant.

The earliest available information available during the background research for this report indicates that the study area had been well established as a residential and farming property by 1947, with boundary fencing [1], a residential building [2] and associated outbuildings like a large shed [3], a market garden [4] and two small dams [5] [6] present by this date. By 1965, a small orchard [7] and two additional dams [8] [9] had been constructed, while the market gardens [4] had been demolished. Trigonometric station Werona TS4720 [10] was built in 1972. By 1978 a vehicle track [11], another small dam [12] had been constructed, and two small dams [5] [6] had been decommissioned, as had the small orchard [7]. Three large dams [13] [14] [15] had been developed by 1991; one of these dams [14] included a brick culvert. At this time the vehicle track [11] was no longer in use, and one of the small dams [8] had also been demolished.

At present, the boundary fencing [1], residential building [2], small dam [9], trigonometric station [10], small dam [12] and large dams [13] [14] [15] are still extant, as is a ruinous water tank and septic tank associated with the residential building [2] and large shed [3]. These features do not constitute archaeological resources, and therefore have not been assessed for archaeological significance.

The study area contains high potential for archaeological resources to be present associated with the large shed [3] and the residential service pipes associated with the residential building [2] (Figure 4). The remaining archaeological resources within the study area [4] [5] [6] [7] [11] were determined to hold low archaeological potential.

However, the archaeological resources to be present associated with the large shed [3] and the residential service pipes associated with the residential building [2] were not determined to hold heritage significance at a local or State level. These resources would not expand or enrich our current understanding of agriculture, pastoralism or domestic life historical themes, nor do they contain archaeological resources which could be associated with important individuals, groups or events. They do not contain any technical or aesthetic values which are unique to the overall historical landscape of the region. They do not contain archaeological remains which would further our knowledge on the study area or wider regions historic occupation and therefore have been assessed as containing no archaeological significance. Therefore, no additional works is required (Figure 5).

7 Impact assessment

7.1 Proposal details

The proposed development for the study area is a data centre campus (commercial/industrial land use). SSD application seeks development consent for the following:

- Approximately 26 four-storey data centre buildings including six technical office buildings, plus a campus office.
- Incoming and internal electrical substations and associated infrastructure.
- Site preparation, including earthworks, stormwater, sewer, roads, and associated infrastructure.

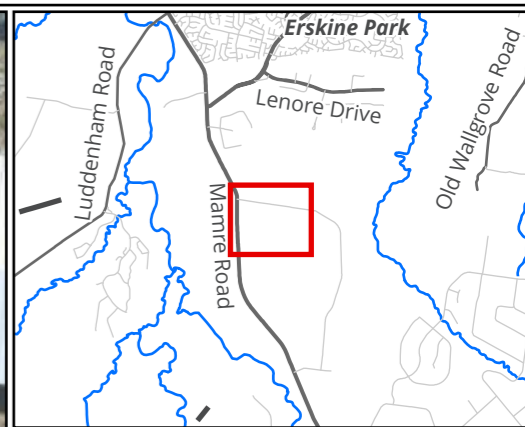
For a detailed description of the proposed development, refer to the Environmental Impact Statement prepared by Willowtree Planning.⁴⁰

7.2 Impact to historical archaeology

This HAA has been prepared to address impacts resulting from the proposed development on any archaeological items of significance within the study area.

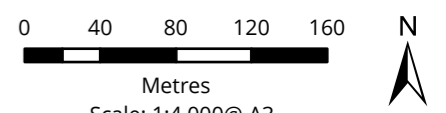
The study area was assessed as containing areas of high and low archaeological potential (Figure 4). However, the archaeological resources associated with these areas have been assessed to not hold archaeological heritage significance at a local or State level. As a result, the proposed works will not impact any significant historical archaeology within the study area. Therefore, no mitigation measures to avoid impacts to historically significant archaeology are required for the project (Figure 5).

⁴⁰ (Willowtree Planning 2025)



- Legend**
- Study area
 - Lot
 - Proposed development
 - No archaeological heritage constraints

Figure 5 Historical archaeological significance assessment and impact assessment



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



Matter: 43278, Date: 09 October 2025,
 Prepared for: CLA, Prepared by: OW, Last edited by: owilliams
 Location: P:\432005\43278\Mapping\43278_Manre_Rd_ISPT_HHA,
 Layout: 43278_HHA_F6_ArchSignificance

8 Conclusions and recommendations

8.1 Recommendations

These recommendations have been formulated to respond to client requirements and the significance of the site. They are guided by the ICOMOS Burra Charter with the aim of doing as much as necessary to care for the place and make it useable and as little as possible to retain its cultural significance.

8.2 Conclusions

Based on background research and physical inspection, the study area was assessed as containing areas of high and low archaeological potential. However, the archaeological resources associated with these areas have been assessed to not hold archaeological heritage significance at a local or State level. As a result, the proposed works will not impact any significant historical archaeology within the study area. Mitigation measures to historical archaeology will include an unexpected finds protocol (see recommendation 2 for full details).

Recommendation 1: No further assessment required

Potential archaeological resources associated with the study area have been assessed as containing no archaeological significance at a local or State level. Therefore, there are no further works required to investigate historical archaeology within the study area.

Should unexpected archaeology be uncovered during works that isn't included in this report, Recommendation 2 must be followed.

Recommendation 2: Implementation of an unexpected finds protocol

Relics are historical archaeological resources of local or State significance and are protected in NSW under the Heritage Act. Should unanticipated relics be discovered during the course of the project, the following steps should be taken:

- If a find is identified, works should stop immediately around the find and the area should be protected.
- The find should be reported to the project manager or supervisor.
- A historical archaeologist should be contacted to identify the find.
- If the find is a relic, a mitigation strategy must be developed and implemented. This could include avoidance of the find, test excavation or other mitigation measures.
- If the find is a relic, notification to Heritage Council under Section 146 of the Heritage Act will be required.

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Appendix 1 Heritage NSW Correspondence

Bronte Baonza

From: Marika Low <marika.low@dcceew.nsw.gov.au>
Sent: Thursday, 2 October 2025 12:55 PM
To: Bronte Baonza
Cc: Alison Lamond
Subject: HNSW reply RE Heritage assessment advice for Mamre Road Data Centre Campus (SSD-92743706)

Follow Up Flag: Flag for follow up
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Hi Bronte,

Thank you for the email and update. I hope your week is going well too!

Heritage NSW understands that the SEARs have now been issued for the proposed **Mamre Road Data Centre Campus** under **SSD-92743706** and that you are requesting confirmation on the proposed approach to addressing the assessment requirements for Heritage. We note that the SEARs require the following in terms of Heritage:

- **Aboriginal Cultural Heritage** – unless otherwise agreed in writing by Heritage NSW, include an *Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared in accordance with the Code of Practice for Archaeological Investigation in NSW (DECCW, 2010), and the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales (OEH, 2011). The ACHAR must:*
 - *identify, describe and assess impacts on the Aboriginal cultural heritage values that exist across the development site*
 - *provide evidence and details of adequate and continuous consultation with Aboriginal people in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010)*
 - *include results of an archaeological survey and test excavations (where required), undertaken in accordance with the relevant guidelines.*
- **Non-Aboriginal Cultural Heritage** – a non-Aboriginal cultural heritage assessment (including both cultural and archaeological significance) which must detail potential impacts on heritage assets and any proposed management and mitigation measures.

Heritage NSW offer the following advice.

Aboriginal Cultural Heritage (ACH):

As the land has recently been assessed under the ACHAR for the Summit at Kemps Creek project (SSD-30628110), and Aboriginal community consultation is ongoing, **Heritage NSW supports the proposed approach for the Mamre Road Data Centre Campus (SSD-92743706) as previously discussed and as outlined in your email.** This includes using the existing ACHAR, continuing consultation with current RAPs, preparing a project update/Addendum and updating the ACHMP to cover both SSD approvals should the proposals be approved. We also offer the following advice:

1. Recommendations for RAP consultation.

The project update letter to existing RAPs should be accompanied by the following supporting documents:

- A copy of the existing ACHAR
- An Addendum report (which may be in letter format), including but not limited to:
 - Details of the new data centre proposal and its relationship to the existing SSD-30628110 approval
 - A summary of the outcomes of the existing ACHAR
 - Updated AHIMS and heritage register searches
 - Description of the proposed works
 - Updated impact assessment
 - Revised management recommendations, including a comparison with those proposed under SSD-30628110
 - Updated mapping

2. Requirements for the EIS Stage:

At the Environmental Impact Statement (EIS) stage, the following is to be submitted to DPHI/Heritage NSW:

- A copy of the Addendum report (with the existing ACHAR included as an appendix)
- Evidence of additional consultation with RAPs regarding the data centre proposal, including a consultation log and copies of all correspondence sent and received.

Non-Aboriginal Cultural Heritage:

Heritage NSW supports the preparation of an updated HHA and SoHI Letter, noting that previous assessments for SSD-30628110 found no heritage items or areas of historical archaeological potential within the study area.

Record of Advice:

This advice has been saved to the project file (Ref: [DOC25/846797](#)). Please include a copy of this email, or reference the DOC number, as part of the supporting documentation for the Addendum ACHAR for SSD-92743706.

Kind regards,
Marika

Marika Low, BA (Hons), PhD (she/her)
Senior Assessments Officer – Major Projects
Heritage NSW
**Department of Climate Change,
Energy, the Environment and Water**

M 0400 477 904 **E** marika.low@dcceew.nsw.gov.au

Locked Bag 5020 Parramatta 2124

Working days Monday to Friday, 08:00am - 04:00pm



From: Bronte Baonza <bbaonza@biosis.com.au>
Sent: Thursday, 2 October 2025 11:09 AM
To: Marika Low <marika.low@dcceew.nsw.gov.au>
Cc: Alison Lamond <alison.lamond@dcceew.nsw.gov.au>

Subject: CM Record: RE: Heritage NSW response RE Summit at Kemps Creek (SSD-30628110) - ACHMP Draft Review (42155)

Hi Marika,

Hope you're having a lovely week.

██████ has now received their SEARS for the below works. Could I confirm the previous advice, which was discussed over the phone, which included:

- The proposed approach of utilising the existing consultation and ACHA for the project. This would include an addendum ACHA which involves ongoing consultation including a project update letter, updated proposed works and recommendations.
- Awaiting approvals before completing/finalising a ACHMP – to save time, money and unnecessary duplication of reports which would become redundant for the study area.
- For the non-heritage works, an updated HHA and SoHI Letter for the new proposed works would be sufficient due to our previous assessments on the area.

For more context, please find our previous assessments here, noting that consultation is still current with the previous ACHA/CHMP: <https://we.tl/t-G2F4ukjWUV>

Please give me a call if you have any further questions or if you'd like to have a meeting.

Kind regards,

Bronte

Bronte Baonza

Heritage Consultant

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Leaders in Ecology, Heritage and Environmental Approvals

Biosis acknowledges the Aboriginal and Torres Strait Islander people as Traditional Custodians of the country on which we live and work. We pay our respects to the Traditional Custodians and Elders past, present and future, and honour their connection to the land and on

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