

Aboriginal Cultural Heritage Assessment

19–25 College Crescent, St. Ives

June 2026

Prepared for: Equity Development Management



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Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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Glossary

Term	Definition
Aboriginal ceremony and dreaming site	Previously referred to as mythological sites, these are spiritual/story places where no physical evidence of previous use of the place may occur, e.g. natural unmodified landscape features, ceremonial or spiritual areas, men's/women's sites, dreaming (creation) tracks, marriage places etc. These are Aboriginal site features recordable on AHIMS.
Aboriginal cultural heritage	The tangible (objects) and intangible (dreaming stories, legends and places) cultural practices and traditions associated with past and present-day Aboriginal communities.
Aboriginal object	As defined in the NPW Act, any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.
Aboriginal place	As defined in the NPW Act, any place declared to be an Aboriginal place (under s.84 of the NPW Act) by the Minister administering the NPW Act, by order published in the NSW Government Gazette, because the Minister is of the opinion that the place is or was of special significance with respect to Aboriginal culture. It may or may not contain Aboriginal objects.
Aboriginal resource and gathering sites	Related to everyday activities such as food gathering, hunting, or collection and manufacture of materials and goods for use or trade. These are Aboriginal site features recordable on AHIMS.
AHIMS	Aboriginal Heritage Information Management System. A register of previously reported Aboriginal objects and Aboriginal places in NSW, managed under Section 90 of the NPW Act.
AHIP	Aboriginal Heritage Impact Permit. A permit issued under Section 90, Division 2 of Part 6 of the NPW Act.
Archaeology	The scientific study of material remains of past human life, including artefacts, relics, ruins, buildings and their environment and context.
Art	Art is found in shelters, overhangs and across rock formations. Techniques include painting, drawing, scratching, carving engraving, pitting, conjoining, abrading and the use of a range of binding agents and the use of natural pigments obtained from clays, charcoal and plants. These are Aboriginal site features recordable on AHIMS.
Artefact	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people. These are Aboriginal site features recordable on AHIMS.
Artefact scatter	Multiple artefacts associated with one another in the same context. These are recordable on AHIMS as 'artefacts'.
Burial	A traditional or contemporary (post-contact) burial of an Aboriginal person, which may occur outside designated cemeteries and may not be marked, e.g. in caves,

marked by stone cairns, in sand areas, along creek banks etc. These are Aboriginal site features recordable on AHIMS.

Ceremonial ring	A Raised earth ring associated with ceremony. These are Aboriginal site features recordable on AHIMS.
Cliff	A steep rock face
Code of Practice	<i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i> (DECCW 2010b).
Conflict site	Previously referred to as massacre sites where confrontations occurred between Aboriginal and non-Aboriginal people, or between different Aboriginal groups. These are Aboriginal site features recordable on AHIMS.
DECCW	Department of Environment, Climate Change and Water NSW.
Due Diligence Code	<i>Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales</i> (DECCW 2010a)
Dune	As defined in the Due Diligence Code, a sand ridge or sand hill formed by the wind.
Earth mound	A mounded deposit of round to oval shape containing baked clay lumps, ash, charcoal and, usually, black or dark grey sediment. The deposit may be compacted or loose and ashy. Mounds may contain various economic remains such as mussel shell and bone as well as stone artefacts. Occasionally they contain burials. These are Aboriginal site features recordable on AHIMS.
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
EP&BC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
Fish trap	A modified area on watercourses where fish were trapped for short-term storage and gathering. These are Aboriginal site features recordable on AHIMS.
Grinding grooves	A groove in a rock surface resulting from manufacture of stone tools such as ground edge hatchets and spears, or rounded depressions resulting from grinding of seeds and grains. These are Aboriginal site features recordable on AHIMS.
Harm	As defined in the NPW Act, to destroy, deface, damage or move an Aboriginal object or destroy, deface or damage a declared Aboriginal place. Harm may be direct or indirect (e.g. through increased visitation or erosion). Harm does not include something that is trivial or negligible.
Habitation structure	Structures constructed by Aboriginal people for short- or long-term shelter. Temporary structures are commonly preserved away from the coastline and may include historic camps of contemporary significance. Smaller structures may make use of natural materials such as branches, logs and bark sheets or manufactured materials such as corrugated iron to form shelters. Archaeological remains of a former structure such as chimney/fireplace, raised earth building platform, excavated pits, rubble mounds etc. These are Aboriginal site features recordable on AHIMS.
Headland	A narrow piece of coastal land that projects from a coastline into the sea or ocean
Hearth	Aboriginal site feature recordable on AHIMS. Cultural deposit sometimes marked by hearth stones, usually also contains charcoal and may also contain heat treated stone fragments.

Isolated find	A single artefact found in an isolated context. These are recordable on AHIMS as 'artefacts'.
Modified Trees	Trees which show the marks of modification as a result of cutting of bark from the trunk for use in the production of shields, canoes, boomerangs, burials shrouds, for medicinal purposes, foot holds etc, or alternately intentional carving of the heartwood of the tree to form a permanent marker to indicate ceremonial use/significance of a nearby area, again these carvings may also act as territorial or burial markers. These are Aboriginal site features recordable on AHIMS.
Non-human bone and organic material	Objects which can be found within cultural deposits as components of an Aboriginal site such as fish or mammal bones, ochres, cached objects which may otherwise have broken down such as resin, twine, dilly bags, nets etc. These are Aboriginal site features recordable on AHIMS.
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPW Regulation	<i>National Parks and Wildlife Regulation 2019</i>
Ochre quarry	A source of ochre used for ceremonial occasions, burials, trade and artwork. These are Aboriginal site features recordable on AHIMS.
PAD	A 'potential archaeological deposit'. An area where Aboriginal objects may occur below the ground surface. These are Aboriginal site features recordable on AHIMS.
Ridge	A compound landform element comprising a narrow crest that is longer than its width
Ridge top (or ridgeline)	The crest of a ridge that extends along its highest contours
Shell	An accumulation or deposit of shellfish from beach, estuarine, lacustrine or riverine species resulting from Aboriginal gathering and consumption. Usually found in deposits previously referred to as 'shell middens.' These are Aboriginal site features recordable on AHIMS.
SSDA	State Significant Development Application, under Division 4.7 of the EP&A Act
Stone arrangement	Human produced arrangements of stone usually associated with ceremonial activities, or used as markers for territorial limits or to mark/protect burials. These are Aboriginal site features recordable on AHIMS.
Stone quarry	A source of stone which was quarried and used for the production of stone tools by Aboriginal people. These are Aboriginal site features recordable on AHIMS.
Waterhole	A source of fresh water for Aboriginal groups which may have traditional ceremonial or dreaming significance and/or may also be used to the present day as a rich resource gathering area (e.g. waterbirds, eels, clays, reeds etc). These are Aboriginal site features recordable on AHIMS.
Waters	As defined in the Due Diligence Code, the whole or any part of any river, stream, lake, lagoon, swamp, wetlands, natural watercourse and tidal waters (including the sea), where the boundary of tidal waters is defined as the high-water mark.

Executive Summary

Urbis was engaged by Equity Development Management ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of 19-25 College Crescent, St. Ives, legally defined as Lot 3 in Deposited Plan 616326 and part of Lot 2 in Deposited Plan 616326 ('the subject area') (Figure 1 and Figure 2).

This ACHA has been prepared to support a State Significant Development Application (SSD- 98363228) for the Construction of a new seniors development comprising of 126 independent living units, 48 residential care beds, basement parking, and communal facilities within the subject area. Vehicular and pedestrian access via Link Road and College Crescent.

The proposed development is for the redevelopment of the site for seniors housing accommodation. The extent of the proposed works include:

- Site preparation and demolition/removal of minor existing structures.
- Construction of four buildings ranging in heights from five to eight storeys comprising:
 - approximately one hundred and twenty-six (126) Independent Living Units
 - approximately forty-eight (48) residential care beds
 - a range of resident amenities and facilities.
 - allied health premises including physiotherapy, hydrotherapy and consulting rooms for the use of residents and the general public.
 - basement car parking containing approximately 260 spaces.
- Vehicular and pedestrian access from Link Road and College Crescent.
- Associated landscaping works.

The ACHA was undertaken in accordance with the requirements of regs. 60 and 61 of the *National Parks and Wildlife Regulation 2019* (NSW) and the following guidelines:

- *Applying for an Aboriginal Heritage Impact Permit guide for applicants* (OEH 2011a)
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011b) ('the Assessment Guidelines').
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) ('the Consultation Guidelines')
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) ('the Code of Practice').

The aim of the ACHA is to investigate whether future development of the subject area is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject area and to formulate measures for avoiding or minimising any such impacts.

The ACHA concluded that:

Conclusion 1 – Known Aboriginal Objects and Places

No known Aboriginal objects or Aboriginal places have been identified within the subject area, or within 500m of the buffer surrounding subject area. Aboriginal objects if present will be within a highly disturbed context.

Conclusion 2 – Sensitive Landscape Features

The subject area is located within 200m of a natural waterway, which is considered indicative of past Aboriginal land use under the Due Diligence Code.

Conclusion 3 – Ground Disturbance

The subject area has been impacted by **moderate to high historical ground disturbance** caused by the clearance of vegetation, ploughing, the construction and demolition of buildings as well as earthworks

Conclusion 4 – Archaeological Potential

There is **low potential** for Aboriginal objects to occur due to moderate to high levels of historical ground disturbance.

Conclusion 5 – Significance Assessment

The subject area is assessed as having **low** Aboriginal heritage significance, with no identified scientific, historic or aesthetic values, no specific Aboriginal associations, and a high level of disturbance further limiting any heritage value.

Conclusion 6 – Impact Assessment

As there are no known Aboriginal objects within the subject area and it is unlikely to retain any as yet unknown Aboriginal objects, the proposed physical works are unlikely to cause either direct or indirect harm to Aboriginal objects or negatively impact inter-generational equity.

The ACHA recommends that

- **Recommendation 1 – Submission of Report**

A copy of this report should be submitted with the Environmental Impact Statement (EIS) in support of SSD- 98363228.

- **Recommendation 2 – No Further Archaeological Investigation**

As the proposed works are unlikely to cause harm to Aboriginal objects, it is recommended that no further investigation is required for the present development. The proposed development can proceed in line with the Archaeological Unexpected Finds Procedure and Human Remains Procedure outlined below.

- **Recommendation 3 – Unexpected Archaeological Finds Procedure**

Should any archaeological deposits be uncovered during any site works following lodgement and approval of SSDA, the following steps must be implemented:

1. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Heritage NSW/ Place Making NSW should be notified of the find through a Section 146 notification. Such management may require further consultation with the approval authority, preparation of a research design and archaeological investigation/salvage methodology.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject site may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW or Place Making NSW.

- **Recommendation 4 – Human Remains Procedure**

Should clearly identifiable human remains be uncovered anywhere within the subject site following lodgement and approval of SSDA, the following procedure should be implemented:

1. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW.

3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

In the event that bones are uncovered which may be human but cannot be confirmed by onsite staff, a suitably qualified archaeologist or heritage specialist should be contacted in the first instance to determine how to proceed.

1

Introduction

1 Introduction

Urbis was engaged by Equity Development Management ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment ('ACHA') of 19–25 College Crescent, St. Ives, legally defined as Lot 3 in Deposited Plan 616326 and part of Lot 2 in Deposited Plan 616326 ('the subject area') (Figure 1 and Figure 2).

This ACHA has been prepared to support a State Significant Development Application (SSD– 98363228) for the Construction of a new seniors development comprising of 126 independent living units, 48 residential care beds, basement parking, and communal facilities within the subject area. Vehicular and pedestrian access via Link Road and College Crescent.

The ACHA was undertaken in accordance with the requirements of regs. 60 and 61 of the *National Parks and Wildlife Regulation 2019* (NSW) and the following guidelines:

- *Applying for an Aboriginal Heritage Impact Permit guide for applicants* (OEH 2011a)
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011b) ('the Assessment Guidelines').
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) ('the Consultation Guidelines')
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) ('the Code of Practice').

The aim of the ACHA is to investigate whether future development of the subject area is likely to impact any Aboriginal objects or Aboriginal places that may exist within the subject area and to formulate measures for avoiding or minimising any such impacts.

1.1 Subject Area

The subject area is located at 19 – 25 College Crescent, St Ives, being residual land associated with Masada College. A small part of land located within the adjoining lot at 9 – 15 Link Road, St Ives will also form part of the developable area associated with the proposed development – specifically this will be used for access purposes (i.e. linking the site to the Link Road frontage), see Figure 1 and Figure 2. The site is located approximately 10km north of Chatswood and 19km north of Sydney CBD.

1.2 Proposed Activity

A State Significant Development Application (SSDA) has been prepared in support of the proposed seniors housing development at 19 – 25 College Crescent, St Ives. The proposed development comprises:

- Site preparation and demolition/removal of minor existing structures.
- Construction of four buildings ranging in heights from five to eight storeys comprising:
 - approximately one hundred and twenty-six (126) Independent Living Units
 - approximately forty-eight (48) residential care beds
 - a range of resident amenities and facilities.
 - allied health premises including physiotherapy, hydrotherapy and consulting rooms for the use of residents and the general public.
 - basement car parking containing approximately 260 spaces.
- Vehicular and pedestrian access from Link Road and College Crescent.
- Associated landscaping works.

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) and accompanying cover letter issued for the project (reference SSD–98363228) dated 10th November 2025. Plans of the proposed development are provided in Appendix A.

1.3 Statutory Context

The protection and management of Aboriginal cultural heritage items, places and archaeological sites within New South Wales is governed by the relevant Commonwealth, State or local government legislation. These are discussed below in relation to the present subject area.

1.3.1 Environment Protection and Biodiversity Conservation Act 1999

The *Environment Protection and Biodiversity Conservation Act 1999* (Cth) ('the EPBC Act') provides protection for properties and places listed on the World Heritage List ('WHL'), the National Heritage List ('NHL') and the Commonwealth Heritage List ('CHL').

The WHL is a list of properties around the world considered to be of outstanding value to humanity, the NHL is a list of places of outstanding significance to the nation and the CHL is a list heritage places owned or controlled by the Australian Government. The WHL, NHL and CHL may include properties and places of Aboriginal heritage significance, in addition to places of natural and historical significance.

It is an offence under sections 15A, 15C, 27A and 27C of the EPBC Act to take any action that is likely to have a significant impact of the relevant heritage values of a place listed on the WHL, NHL or CHL. Approval from the Minister is required for controlled actions which will have a significant impact on items and places included on the WHL, NHL or CHL.

Properties and places listed on the WHL, NHL or CHL, are included in the Australian Heritage Database ('AHD'). The AHD also includes places under consideration, or that may have been considered, for any one of these lists. A search of the AHD was undertaken on 15 October. The search did not identify any Aboriginal heritage properties or places within the curtilage of the subject area that are protected under the EPBC Act.

1.3.2 National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NSW) ('the NPW Act') protects 'Aboriginal objects' and 'Aboriginal places' in NSW. The NPW Act defines 'Aboriginal objects' and 'Aboriginal places' as follows:

- **Aboriginal object** means 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.
- **Aboriginal place** means any place, which may or may not contain Aboriginal objects, that is declared to be an Aboriginal place under section 84 of the NPW Act because it is or was of special significance with respect to Aboriginal culture.

Under section 86 of the NPW Act, it is an offence to harm or desecrate an Aboriginal object or Aboriginal place. Section 87 of the NPW Act provides the following defences to prosecution under s. 86 of the NPW Act:

- The harm was to a previously unknown Aboriginal object, other than a modified tree, and was caused by a low impact activity as defined in reg. 58 of the NPW Reg.
- The harm was to a previously unknown Aboriginal object and due diligence was exercised by the Proponent to determine whether the activity would harm an Aboriginal object and reasonably determined that no Aboriginal object would be harmed, per section 87(2) of the NPW Act.
- The harm or desecration was authorised by an Aboriginal Heritage Impact Permit ('AHIP'), per section 87(1) of the NPW Act.
- The harm or desecration was authorised by an approved State Significant Development Application, per section 4.41(1)(d) of the *Environmental Planning and Assessment Act 1979* (NSW).

This ACHA was prepared to support an application for a State Significant Development, an approval for which would facilitate any works with the potential to impact Aboriginal objects, if present.

1.3.3 Ku-ring-gai Local Environmental Plan 2015

The Environmental Planning and Assessment Act 1979 (EP&A Act) requires each LGA to produce a Local Environment Plan (LEP). The LEP identifies items and areas of local heritage significance and outlines development consent requirements.

The subject area falls within the Ku-ring-gai Local Government Area (LGA) and is subject to the Ku-ring-gai Local Environmental Plan 2015 (Ku-ring-gai LEP 2015). Under Section 5.10, Clause 2 of the Ku-ring-gai LEP 2015, development consent is required when:

- (d) disturbing or excavating an Aboriginal place of heritage significance,*
- (e) 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,*

Under Section 5.10, Clause 8 it is specified that:

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

- (a) 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*
- (b) 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.*

Archaeological sites are listed under Schedule 5 of the Ku-ring-gai LEP 2015. A search of the Ku-ring-gai LEP 2015 was undertaken on 8 October 2025. No items of Aboriginal heritage significance are listed on the LEP within proximity of the subject area.

Under Division 4.7 of the EP&A Act, some legislation “does not apply” to development that is State significant development. This development requires approval from the Minister for Planning or Independent Planning Commission. Approval may be granted for SSDs even if they do not comply with elements of a local planning instrument. As such, LEP clauses regarding heritage protections may be superseded for an SSD. With regards to Aboriginal archaeology, this includes “an Aboriginal heritage impact permit under section 90 of the National Parks and Wildlife Act 1974.” However, SSD approvals still require that relevant environmental regulations be considered as part of the assessment process, including those related to Aboriginal archaeology.

1.4 Authorship

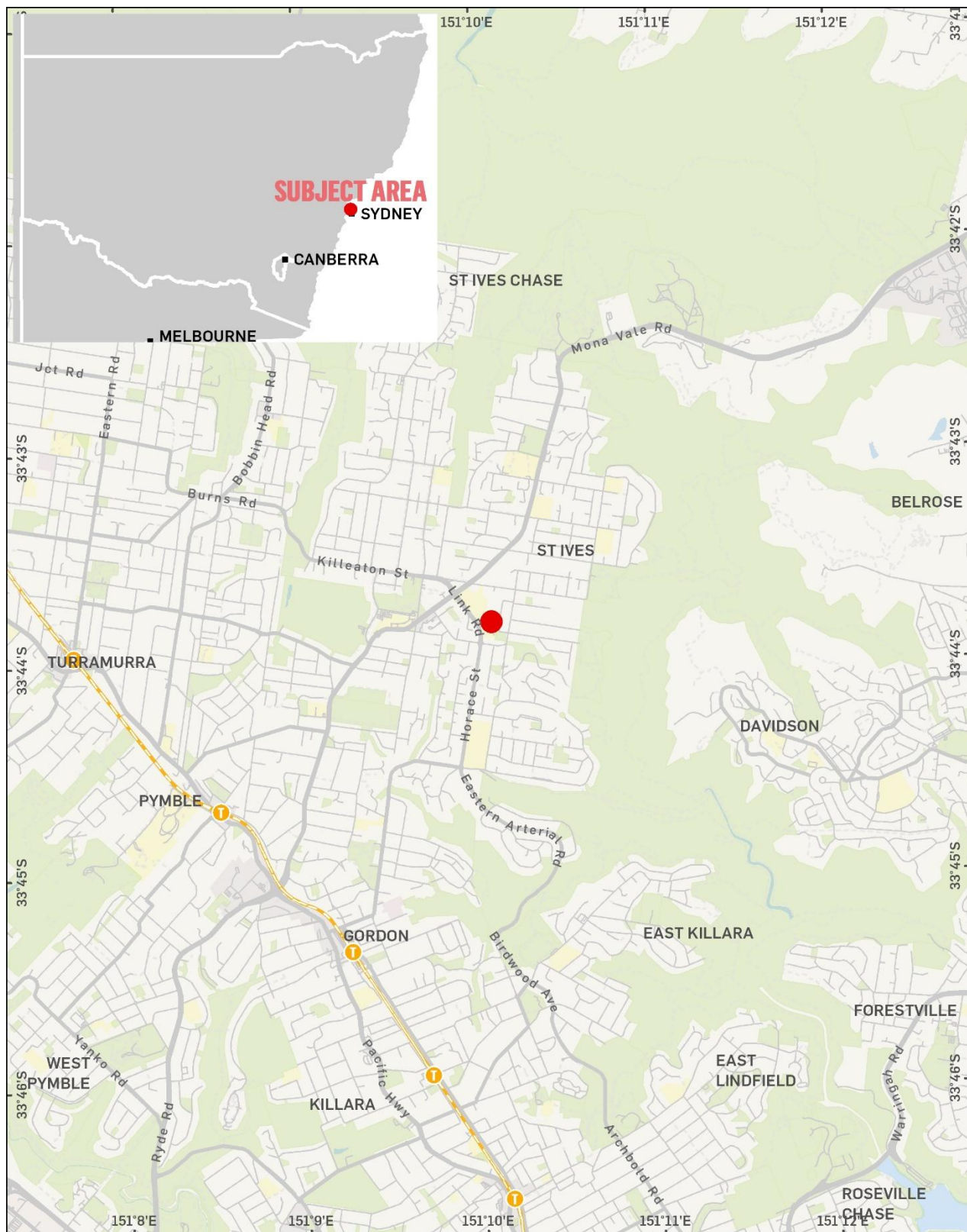
The present report has been prepared by Pedro Silva and Juliet Schofield (Urbis Consultants), with review and quality control undertaken by Ali Byrne (Urbis Associate Director).

Pedro Silva holds a Bachelor of History and Archaeology (Honours) from the University of Coimbra (Portugal) Juliet Schofield holds a Bachelor of Arts (Archaeology), and a Bachelor of Advanced Studies (Design). Ali Byrne holds a Bachelor of Arts (Archaeology) from the University of Sydney.

1.5 Limitations

The ACHA is limited to consideration of Aboriginal objects and places. Historical heritage properties and places protected under the EPBC Act and historical heritage items and relics protected under the *Heritage Act 1977* (NSW) are not considered.

The ACHA included completion of a desktop assessment and archaeological survey, however no test excavations have been undertaken for the site as part of the current assessment.



GDA 1994 MGA Zone 56

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Project No: P0063225
Project Manager: Ali Byrne

● Subject Area

REGIONAL LOCATION
19 – 25 College Crescent, St Ives
The Sir Moses Montefiore Jewish Home

Figure 1 – Regional Location

Source: Urbis

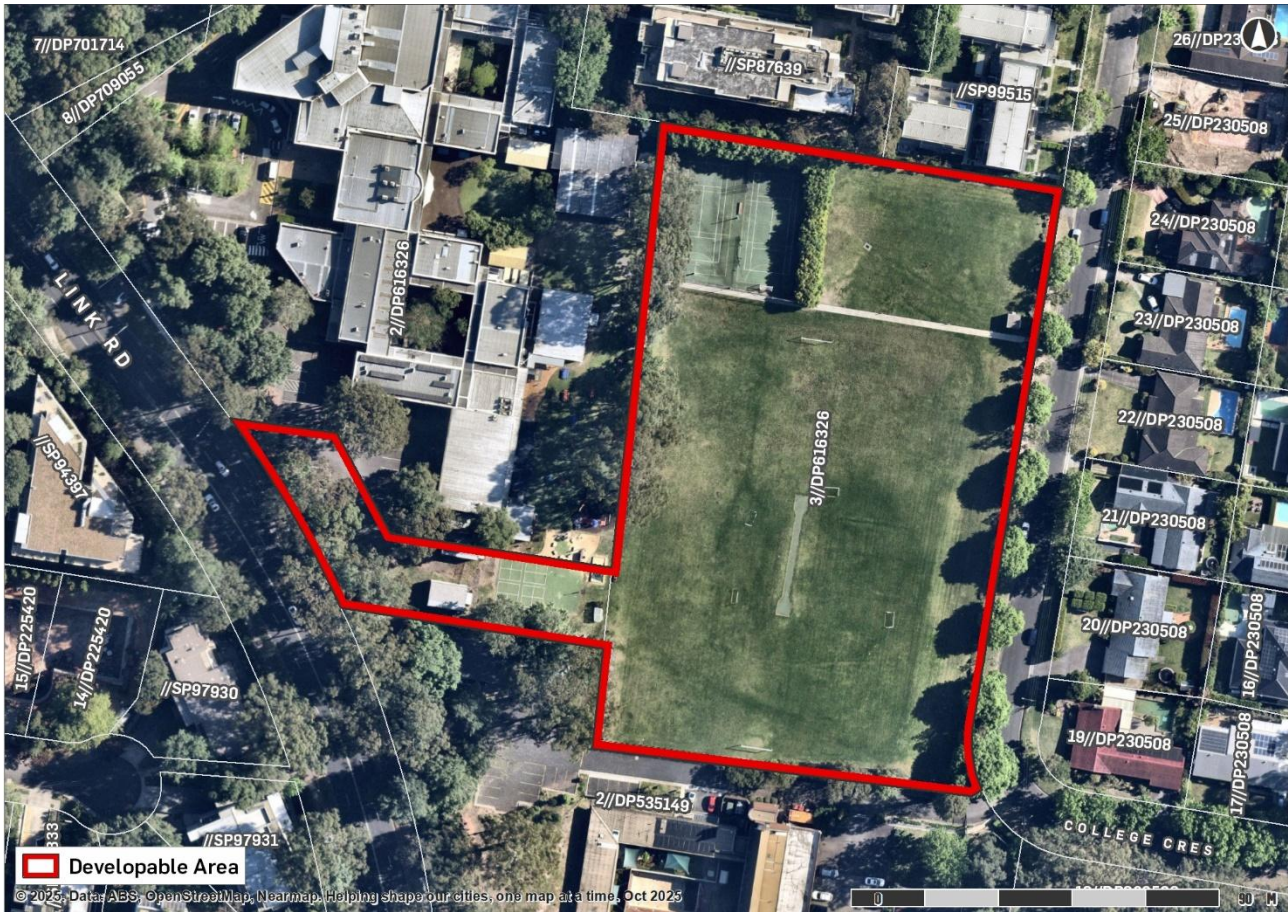


Figure 2 Location of the subject area

Source: NearMap with Urbis overlay

2

Aboriginal Consultation

2 Aboriginal Consultation

Consultation with the Aboriginal community is required under reg. 60 of the NPW Reg and the Consultation Requirements. The purpose of consultation with Aboriginal people is to understand their views and concerns about the proposed project and to understand the cultural values present in the area that may be harmed. Consultation ensures that Aboriginal people have the opportunity to improve assessment outcomes by providing relevant cultural information, influencing assessment methodology, contributing to the development of cultural heritage management options and reviewing and commenting the draft assessment report.

The Consultation Requirements outline a four-stage consultation process that includes the following:

- Stage 1 – Notification of project proposal and registration of interest.
- Stage 2 – Presentation of information about the proposed project.
- Stage 3 – Gathering information about the cultural significance.
- Stage 4 – Review of draft cultural heritage assessment report.

The following section documents the conduct and results of the Aboriginal consultation undertaken as part of the present assessment.

2.1 Stage 1 – Notification and Registration

The aim of Stage 1 of Aboriginal consultation is to identify, notify and register Aboriginal people who hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places in the subject area.

2.1.1 Native Title

A search of the National Native Title Tribunal (NNTT) registers and databases was undertaken on 15 October 2025. The search identified no pending Native Title claims or Native Title registrations for the subject area. The NNTT was also contacted by email on 15 October 2025 to request a formal search of the NNTT Register. A reply was received on 22 October 2025 indicating that there are no Native Title matters overlapping with the subject area.

2.1.2 Identification of Cultural Knowledge Holders

To identify Aboriginal people who may be interested in registering as Aboriginal parties for the project, the organisations stipulated in Section 4.1.2 of the Consultation Guidelines were contacted on 16 October 2025 (Table 1). A copy of the email sent to the each of the contacted organisations is included in Appendix D: Registered Aboriginal Party Consultation Documentation. A total of 72 Aboriginal parties with a potential interest in the subject area were identified during this stage.

Table 1 – Contacted organisations

Organisation	Notification Sent	Response Received
Ku-ring-gai Council	16/10/2025	N/A
Metropolitan Local Aboriginal Land Council	16/10/2025	16/10/2025
Greater Sydney Local Land Services	16/10/2025	17/10/2025
Heritage NSW	16/10/2025	20/10/2025
National Native Title Tribunal	16/10/2025	22/10/2025
NTS Corp	16/10/2025	N/A

Organisation	Notification Sent	Response Received
Office of the Registrar, Aboriginal Land Rights Act 1983	16/10/2025	17/10/2025

Letters were sent to the 72 identified Aboriginal parties by either email or mail on 31 October 2025 to notify them of the proposed project. The letters included a brief introduction to the project and the project location including a map of the subject area and set a deadline for response of 14 November, providing 14 days to register an interest. A copy of the letter is included in Appendix D: Registered Aboriginal Party Consultation Documentation.

An advertisement was placed in one online newspaper with national circulation to Aboriginal People, the 'NewsCorp Australia'. The advertisement was published online on 30 October 2025 and registration was open until 13 November, providing 14 days to register an interest. A copy of the advertisement is included in Appendix C.

2.1.3 Registration of Interest

A total of 13 Aboriginal parties registered interest in the project as a result of this phase (Table 2). Two of the Aboriginal parties were registered despite responding after the deadline.

A list of the Registered Aboriginal Parties (RAPs) was provided to Heritage NSW and Metropolitan Local Aboriginal Land Council on 4 February 2026 (see Appendix C). The details of one RAP were withheld Metropolitan Local Aboriginal Land Council at their request.

Table 2 – Registered Aboriginal Parties

Registered Party	Contact
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

2.2 Stage 2 & 3 – Presenting and Gathering Information

The aim of Stages 2 and 3 of the community consultation process is to provide RAPs with information about the scope of the proposed project and the proposed ACHA methodology, to gather feedback on the proposed project and proposed methodology and to gather any cultural information that the RAPs wish to share.

2.2.1 Presentation of Project Information and Methodology

A Stage 2 & 3 information pack was sent to registered Aboriginal parties via email on 21 November 2025. The information pack was prepared as a combination of Stage 2 and 3 of the Consultation Guidelines, and included the following information:

- An outline of the proposal and an overview of the subject area.
- The proposed methodology for the ACHA, including the impact assessment process and input points for RAPs into the investigation and assessment.
- Critical timelines and milestones for the completion of assessment activities and delivery of reports.
- Agreed roles, functions and responsibilities.
- A request for comment on methodology, recommendations for site investigation any cultural information the respondent wished to share.

A response to the Stage 2 & 3 information pack was requested by 19 December 2025, providing 28 days to respond. A copy of the Stage 2 & 3 information pack is included in Appendix C.

2.2.2 Site Visit and Meeting

A separate communication was sent on 19 December 2025 to all RAPs who had expressed an interest a schedule of rates and copies of insurances by the deadline. The communication invited the RAPs to register for a site visit and meeting to be held on 22 January 2026 as part of Stage 2 & 3 of the consultation process.

The purpose of the site inspection and meeting was to conduct a thorough briefing with the RAPs about the proposed development, to conduct a walkover of the subject area with the RAPs, to discuss the information provided in the Stage 2 & 3 information pack and to discuss potential archaeological mitigation strategies.

Due to site specific security restrictions only one RAP member was invited to participate. One RAP member confirmed their intention to be present however they were not able to attend on the agreed day. As such the site visit was conducted without the presence of a RAP.

2.2.3 Gathering Feedback

Responses from two of the RAPs were received in relation to the Stage 2 & 3 information pack. The responses are included in Appendix C. All responses included comments on the proposed methodology and/or provided cultural information. Those responses are addressed in Table 3 below.

Table 3 – RAP responses to the Stage 2 & 3 Information Pack

[illegible]

[illegible]

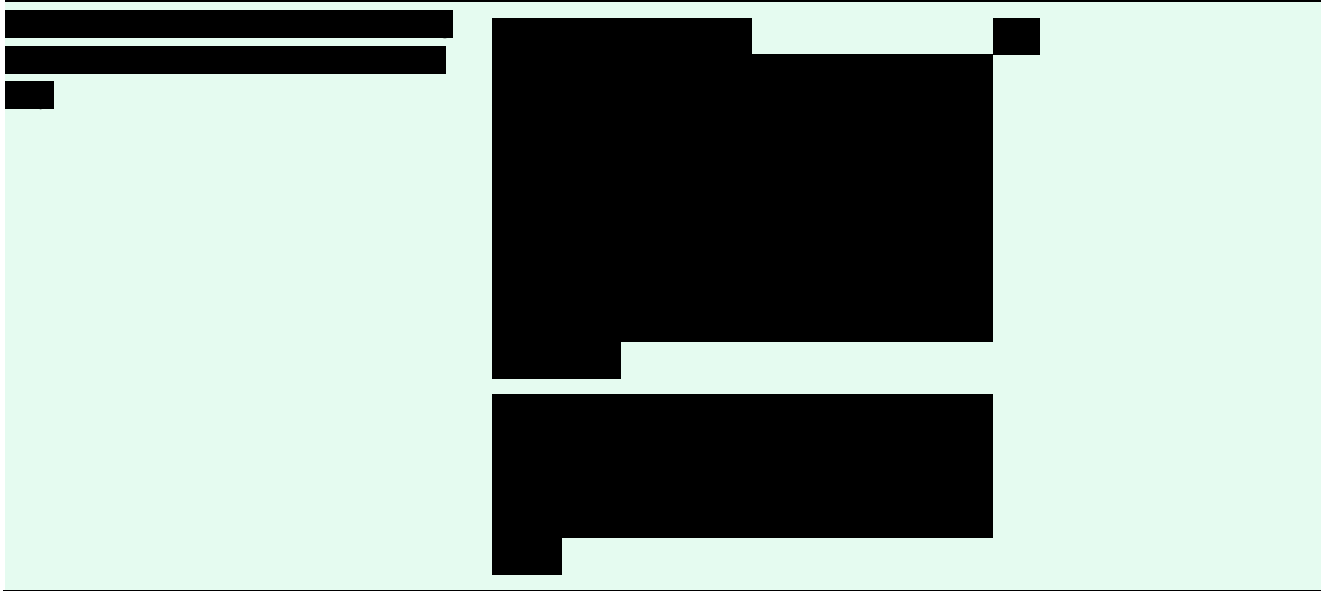
2.3 Stage 4 – Review of Draft ACHA Report

The aim of Stage 4 of the community consultation process is to prepare and finalise an ACHA report with input from RAPs.

A draft of the present ACHAR was sent to RAPs via email on 20 March 2026 with comment on the draft ACHAR requested by 17 April 2026, providing 28 days to respond. Zero responses were received in relation to the Stage 4 draft ACHA report.

During review of the documentation it was noted that two errors were made during Stage 1, as outlined below.

Documentation omitted	Action	Outcome
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]



3

Desktop Assessment

3 Desktop Assessment

The aim of the desktop assessment is to determine whether any known Aboriginal objects are located within the subject and whether the subject area is likely to retain any unknown Aboriginal objects. The findings of the desktop assessment inform the archaeological survey of the subject area and contribute to the determining whether an archaeological test excavation is required.

3.1 Archaeological Context

The archaeological context of the subject area encompasses previous archaeological and ethnohistorical studies that are relevant to determining the nature and distribution of Aboriginal archaeological material within the local region and subject area and local region.

3.1.1 Aboriginal Land Use

Due to the absence of written records, much of our understanding of Aboriginal life pre-colonisation is informed by the histories documented in the late 18th and early 19th century by European observers. These histories provide an inherently biased interpretation of Aboriginal life both from the perspective of the observer but also through the act of observation. The social functions, activities and rituals recorded by Europeans may have been impacted by the Observer Effect, also known as the Hawthorne Effect. According to the Observer/Hawthorne Effect, individuals will modify their behaviour in response to their awareness of being observed. With this in mind, by comparing/contrasting these early observations with archaeological evidence is possible to establish a general understanding of the customs, social structure, languages and beliefs of Aboriginal people (Attenbrow 2010).

The archaeological record provides evidence of the long occupation of Aboriginal people in Australia. Current archaeological research establishes occupation of the Australian mainland by as early as 65,000 years before present (BP) (Clarkson et al. 2017). The oldest date for a site in the Sydney region is at Pitt Town on the Hawkesbury River, approximately 33km Northwest of the present subject area, which is dated to around 36,000 BP (Williams et al. 2014). Older occupation sites along the now submerged coastline would have been flooded around 10,000 years BP, with subsequent occupation concentrating along the current coastlines and rivers (Attenbrow 2010).

Given the early contact with Aboriginal people in the Sydney region, more is known about these groups than those that inhabited regional areas. The Aboriginal population in the greater Sydney region is estimated to have been between around 4000 and 8000 people at the time of European contact (Attenbrow 2010). The area around the present subject area was inhabited by the Darramuragal, also known as Dharug people which occupied a vast majority of land that spanned from Newcastle all the way down to Sydney.

The archaeological record is limited to materials and objects that were able to withstand degradation and decay. As a result, the most common type of Aboriginal objects remaining in the archaeological record are stone artefacts. Flaked artefacts are typically the most common type of stone artefact encountered, in part due to their long and ubiquitous use, but also due to their high discard rate and the large amount of waste produced during manufacture (Holdaway et al, 2004:1). However, ground edged tools are also known to have been utilised by Aboriginal people in the Sydney region. Stone technology and raw material utilisation changed over time. Until about 8,500 BP, stone tool technology remained fairly static with unifacial flaking being dominant and a preference for silicified tuff, quartz and some unheated silcrete evident. After about 4,000 BP, bipolar flaking and backed artefacts appear more frequently and ground stone axes are first observed (Attenbrow 2010:102). From about 1,500 BP, there is evidence of a decline in stone tool manufacture, possibly due to an increase in the use of organic materials, changes in the way tools were made or changes in tool preferences (Attenbrow 2010). After European contact, Aboriginal people of the Sydney region continued to manufacture tools, sometimes with new materials such as bottle glass or ceramics (e.g. Ngara Consulting 2003).

Based on the above background, it is possible that similar evidence of Aboriginal occupation may also be present within original and/or intact topsoils within the present subject area.

3.1.2 Declared Aboriginal Places

The NSW State Heritage Inventory (SHI) includes all declared Aboriginal places within NSW, in addition to historic heritage items listed on the State Heritage Register (SHR), listed Interim Heritage Orders (IHOs) and items listed on Local Environment Plans (LEPs) and State Environmental Planning Policies (SEPPs).

A search of the SHI was undertaken on 9 October 2025. The search did not identify any heritage items or Aboriginal places within the curtilage of the subject area.

3.1.3 Registered Aboriginal Objects

The Aboriginal Heritage Information Management System (AHIMS) is a database of registered Aboriginal sites in NSW. Each registered Aboriginal site includes one or more site 'features', which may be considered an Aboriginal object under the NPW Act. An Aboriginal site may include one or more site features.

The *Guide to completing the AHIMS Site Recording Form* (OEH 2012) lists 20 different features that may be recorded on AHIMS. The most common site features registered in NSW are artefacts, modified trees, art, grinding grooves and shell deposits (see Glossary for definitions). However, the likelihood of any particular site feature being found will vary according to region and environment. Less common site features that are encountered are burials, ceremonial rings, earth mounds, fish traps, habitation structures, hearths, non-human bone and organic material, ochre quarries, stone arrangements and stone quarries (see Glossary for definitions).

Other Aboriginal site features that are recorded on AHIMS but are not necessarily 'Aboriginal objects' within the meaning of that term as it is defined in the NPW Act (i.e. are not a 'deposit, object or material evidence... relating to the Aboriginal habitation of the area') are potential archaeological deposits (PADs), Aboriginal ceremony and dreaming sites, Aboriginal resource and gathering sites, conflict sites and waterholes (see Glossary for definitions). These features are only considered to be 'Aboriginal objects' for the purpose of the NPW Act if accompanied by at least one of the other site types defined above.

The AHIMS database also provides information on the context of registered Aboriginal sites. Sites that are recorded as 'closed' contexts are those that include a cave or rock overhang, while all other sites are recorded as 'open' context.

It should be noted that the AHIMS register does not represent a comprehensive list of all Aboriginal objects or places as it is limited to sites that have been previously identified and registered. Registration is typically the result of previous archaeological investigation, so the number of registered Aboriginal sites in area is dependent on the amount of such research previously undertaken.

3.1.3.1 Identified Sites

A search of the AHIMS was carried out on 8 October 2025 (AHIMS Client Service IDs: 1052621 and 1052626) for an area of approximately 8 km x 8 km centred on the subject area. The Basic and Extensive AHIMS search results are included Appendix B: Basic and Extensive AHIMS Search Results.

The search was undertaken to determine if:

- There are any registered Aboriginal sites registered within the curtilage of the subject area.
- There are any registered Aboriginal sites near the subject area that might extend into it.
- There is any association of Aboriginal sites with certain landscape features within the broader region that may be instructive for determining the likelihood of Aboriginal sites within the subject area.

A summary of all previously registered Aboriginal objects and Aboriginal places within the search area is provided below. A total of 63 Aboriginal sites are registered in the search area. The locations of the 63 identified Aboriginal sites are shown in Figure 3. The search did not identify any Aboriginal objects or Aboriginal places within the curtilage of the subject area nor within a 500m radius.

The number and types of sites features in the search area are presented in Table 4. Among the 63 registered Aboriginal sites in the search area, a total of 80 site features were identified of 6 different types: Art, Artefact, Grinding Groove, Modified Tree, Potential Archaeological Deposit (PAD) and Shell.

The most common feature in the AHIMS search area is Art (n = 43), which are present in 68% of sites and account for 54% of all features. This indicates that the area surrounding the subject area is of significance to the Dharug people either for general land use (e.g. navigation) and/or ceremonial purposes. The second most common feature was Artefact (n = 13), present in 21% of the sites and accounting for 16% of all features. This is consistent with the important role stone tools played in the everyday lives of Aboriginal people, as discussed in Section 3.1.1 above.

A spatial analysis of the sites clearly indicates that the vast majority of sites are found near waterways. These associations are consistent with the importance of waterways to the Dharug and is consistent with the general predictive model for NSW, which consider natural waterways to be indicative of likely past Aboriginal land use (see Section 3.1.4. below).

Table 4 – Summary of registered Aboriginal sites in the AHIMS search area

Site Features	Number	% of Features	% of Sites
Art	43	54%	68%
Artefact	13	16%	21%
Grinding Groove	7	9%	11%
Modified Tree	2	3%	3%
PAD	7	11%	11%
Shell	8	13%	13%

The contexts of the registered Aboriginal sites within the AHIMS search area are also summarised in Table 5 below. Closed context sites are those that include a cave or rock overhang, while open context sites are those without a cave or rock overhang. Most registered Aboriginal sites in the search area are in an open context site, representing 67% (n = 42) of all sites while closed sites represented 33% (n = 21).

Table 5 – Context of Registered Aboriginal sites in AHIMS search area

Site Context	Number	% of Sites
Open	42	67%
Closed	21	33%

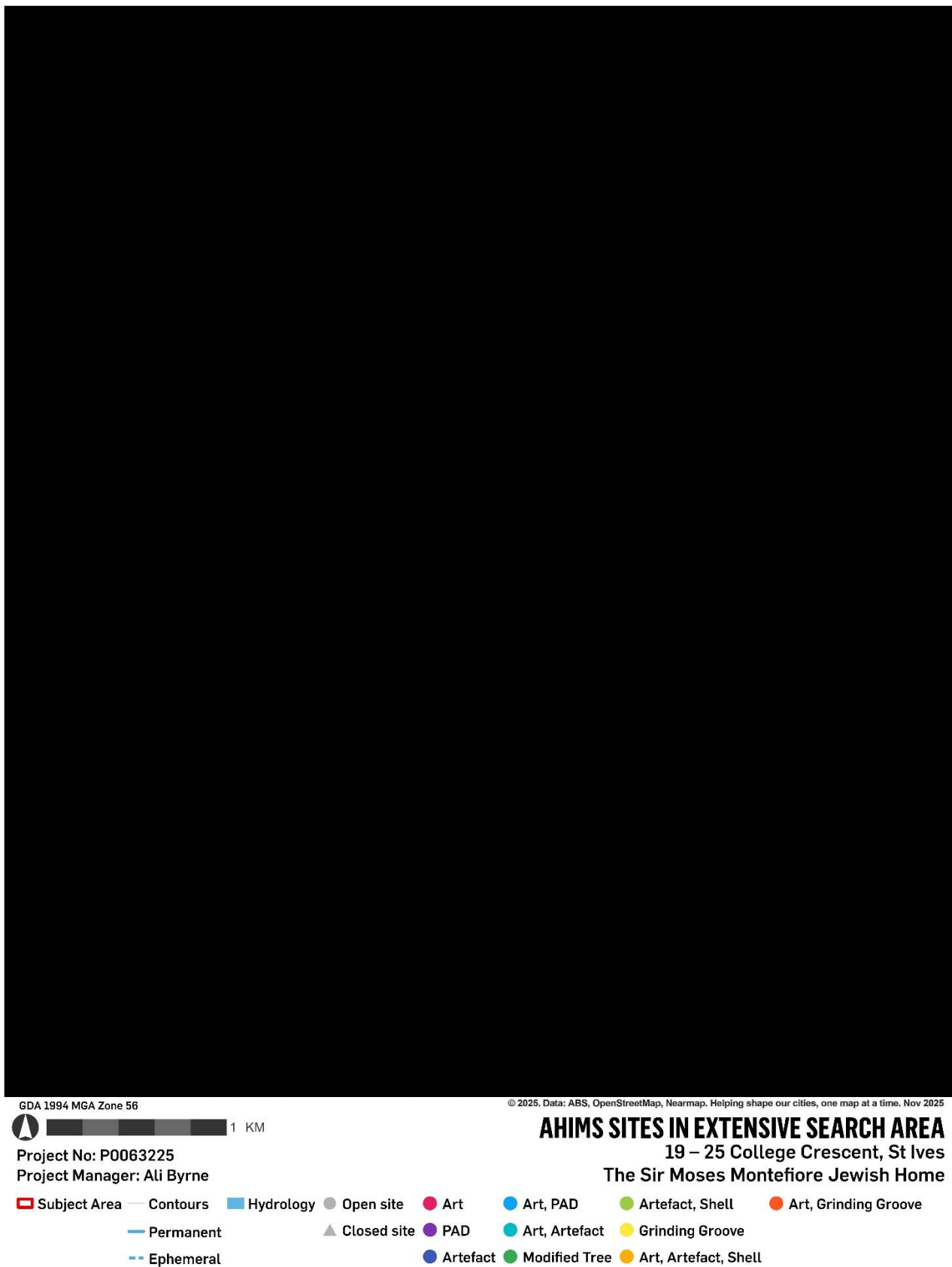


Figure 3 Locations of registered Aboriginal site in AHIMS search area

3.1.4 Previous Archaeological Investigations

Previous Aboriginal archaeological investigations undertaken within or near to the subject area may provide information about known Aboriginal sites that have not previously registered on the AHIMS database. Additionally, Aboriginal archaeological investigations undertaken in the broader region may provide information on the types of archaeological site features that are likely to occur within the subject area.

3.1.4.1 Investigations of the Subject area

There have been no archaeological investigations that directly relate to the present subject area.

3.1.4.2 Regional Investigations

A number of investigations have been undertaken in the broader region. The most relevant investigations to the present subject area are discussed below.

Cultural Heritage Connections (2017) conducted an Aboriginal Archaeological Impact Assessment (AAIA) of Waitara Public School located approximately 5.9 km northwest of the subject area. The AAIA included a desktop assessment of the site's colonial history, location of Aboriginal sites and a site inspection. The desktop assessment indicated location to have been in continuous use as a school since the 1930s and the site observance indicated a disturbed landscape. Furthermore, the site is located away from a water source. As such based in these circumstances the study concluded that the school site has low potential for intact deposits or Aboriginal objects to occur.

Artefact (2021) conducted an ACHA report for the Pymble Ladies' College located approximately 3.6 km southwest of the subject area. The archaeological investigation included a desktop assessment of the area's colonial history, location of Aboriginal sites near to the study area, and a site inspection. The report found the majority of the site had been subject to significance disturbance though the constructions of buildings and landscaping and that the presence of Aboriginal objects was unlikely due to substantial movement and modification of soils.

Austral (2024) undertook an archaeological investigation of 285–289 Mona Vale Road & 1 Flinders Avenue, St Ives, approximately 400 m north of the present subject area. The archaeological investigation consisted of an ACHA which included a site survey. The archaeological survey identified that significant ground disturbance had occurred in much of the study area as part of historical development and the resulting extensive modification and disturbance removed any areas which might be recognised as holding archaeological potential. As a result, it concluded that the site possessed low cultural significance and unlikely to hold any Aboriginal artefacts within the study area.

3.1.5 Existing Predictive Models

Predictive models are used to determine the likelihood of Aboriginal archaeological material being located within a particular area. A review of existing predictive models relevant to the region around subject area is relevant for formulating a predictive model for the present assessment.

The *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010c) ('The Due Diligence Code') provides an overarching predictive model for the entirety of NSW. The Due Diligence Code specifies the following 'relevant landscape features' that are considered indicative of likely past Aboriginal land use:

- Areas within 200 m of waters including freshwater and the high tide mark of shorelines.
- Areas located within a sand dune system.
- Areas located on a ridge top, ridge line or headland.
- Areas located within 200 m below or above a cliff face.
- Areas within 20 m of or in a cave, rock shelter, or a cave mouth.

3.2 Environmental Context

The environment context of the subject area encompasses the natural landscape and the impacts of historical human activity. These aspects of the environmental context are relevant to predicting the potential for unknown Aboriginal objects occurring within the subject area.

3.2.1 Natural Landscape

The purpose of reviewing the natural landscape of the subject area is twofold. It assists in the prediction of the intensity and nature of Aboriginal land use and deposition of archaeological material in the subject area by considering the landforms and resources that would have played a part in the everyday lives of Aboriginal people. It also assists in the determining the likelihood that those material remains would have survived any natural geomorphological process or historical ground disturbance (discussed in Section 3.2.2 below).

Topography: The subject area is located on an upper slope within an undulating urban plateau which extends northwards to North Turramurra and St Ives Chase and westwards to Wahroonga. To the east the plateau is reticulated by steep gullies associated with tributaries to the Middle Harbour creek (Figure 4) The subject area is not located on a ridge top, ridge line or headland or within 200 m of a cliff face.

Soils and Geology: The NSW Soil and Land Information System (SALIS) indicates that the Blacktown soil landscape occupies the majority of the study area. The Glenorie soil landscape occupies a small portion of the subject area on the southwestern corner (Figure 5).

The Blacktown soil landscape is described as occurring in two locations: (1) on crests, upper slopes and well-drained areas; and (2) on lower slopes and in drainage depressions and localised areas of poor drainage. Blacktown soils vary considerably between these two locations. The subject area is located on an upper slope where the A horizon is likely to consist of a brownish black loam to clay loam, up to 30cm depth followed by a brown clay loam to silty clay loam, 10–20cm with a maximum depth of 50 cm. All soil types within the Blacktown soil landscape are moderately susceptible to sheet erosion following vegetation clearance. Sheet erosion is likely to impact the retention of Aboriginal objects within natural soil deposits. The higher the sheet erosion the less likely there is to be Aboriginal objects *in situ*.

The Glenorie soil landscape is described as residing upon undulating to rolling low hills on Wianamatta Group shales. Soils are described as shallow to moderately deep (<100 cm) Red Podzolic Soils on crests, with moderately deep (70–150 cm) Red and Brown Podzolic Soils on upper slopes and deep (>200 cm) Yellow Podzolic Soils and Gleyed Podzolic Soils along drainage lines. Dominant soil materials include friable dark brown loam, hard-setting brown clay loam whole-coloured reddish brown strongly pedal clay, mottled grey plastic clay and brownish-grey plastic silty clay.

Approximately 20 m east of the subject area the Gympie soil landscape is present and described as undulating to rolling rises and low hills with shallow to moderately deep soils.

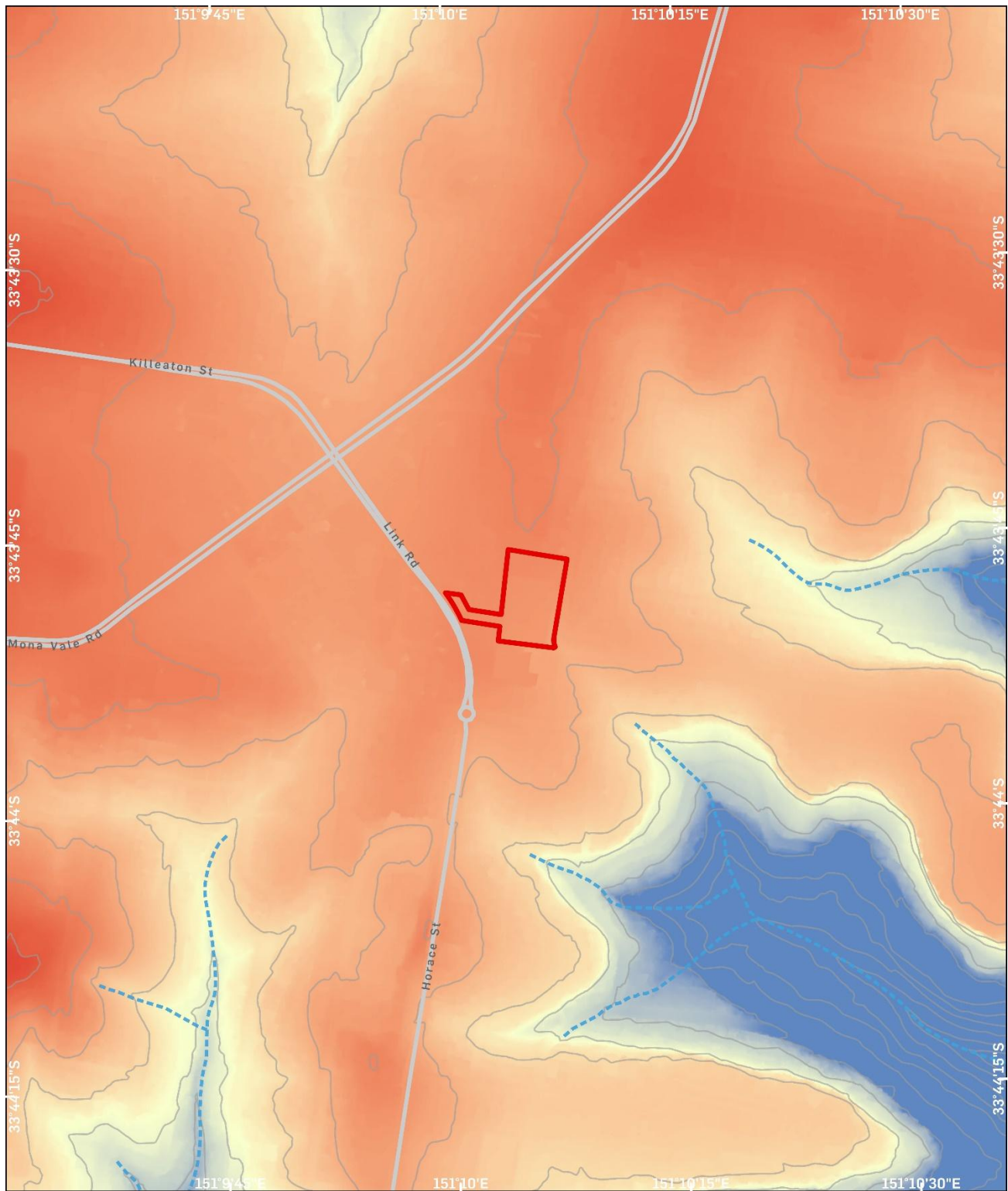
The underlying geology of the subject area consists of Wianamatta Group shales and Hawkesbury shale. The subject area is not located within a dune system nor are there rock outcrops, which may indicate the presence of a cave or rock shelter.

A geotechnical investigation conducted by JKGeotechnics in March 2025 indicated that the subject area consists of a dark grey brown, artificial fill layer with trace of root fibres followed by a highly plastic silty clay, light grey mottled red brown in colour, above the Ashfield Shale consisting of siltstone with iron indurated bands.

Vegetation: Almost completely cleared tall open-forest (wet sclerophyll forest) and open-woodland (dry sclerophyll forest). Remaining traces of the original wet sclerophyll forest containing Sydney blue gum *Eucalyptus saligna* and blackbutt *E. pilularis* are located at Ashfield Park. The original woodland and open-forest in drier areas to the west were dominated by forest red gum *E. tereticornis*, narrow-leaved ironbark *E. crebra* and grey box *E. moluccana*. This has been almost completely cleared. The subject area has been cleared of vegetation and does not include tree species that that could have been subject to cultural modification. The present vegetation consists of short grass and young trees.

Hydrology: The nearest natural water source to the subject area is a first order tributary stream to the Middle Harbour Creek located approximately 180m to the southwest. Additionally historical mapping suggest that this same stream previously extended into the subject area (Figure 6).

The relevance of the natural landscape for the present assessment is discussed in the application of the predictive model to determining Aboriginal archaeological potential in Section 3.4.2 below.



GDA 1994 MGA Zone 56

© 2025. Data: ABS, OpenStreetMap. Helping shape our cities, one map at a time. Nov 2025



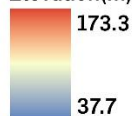
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Project No: P0063225

Project Manager: Ali Byrne

Subject Area — Contours Elevation(m)

Ephemeral



TOPOGRAPHY

19 – 25 College Crescent, St Ives
The Sir Moses Montefiore Jewish Home

Figure 4 - Topography

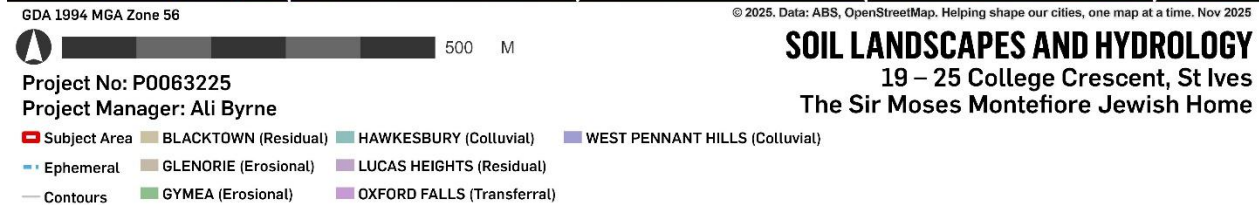
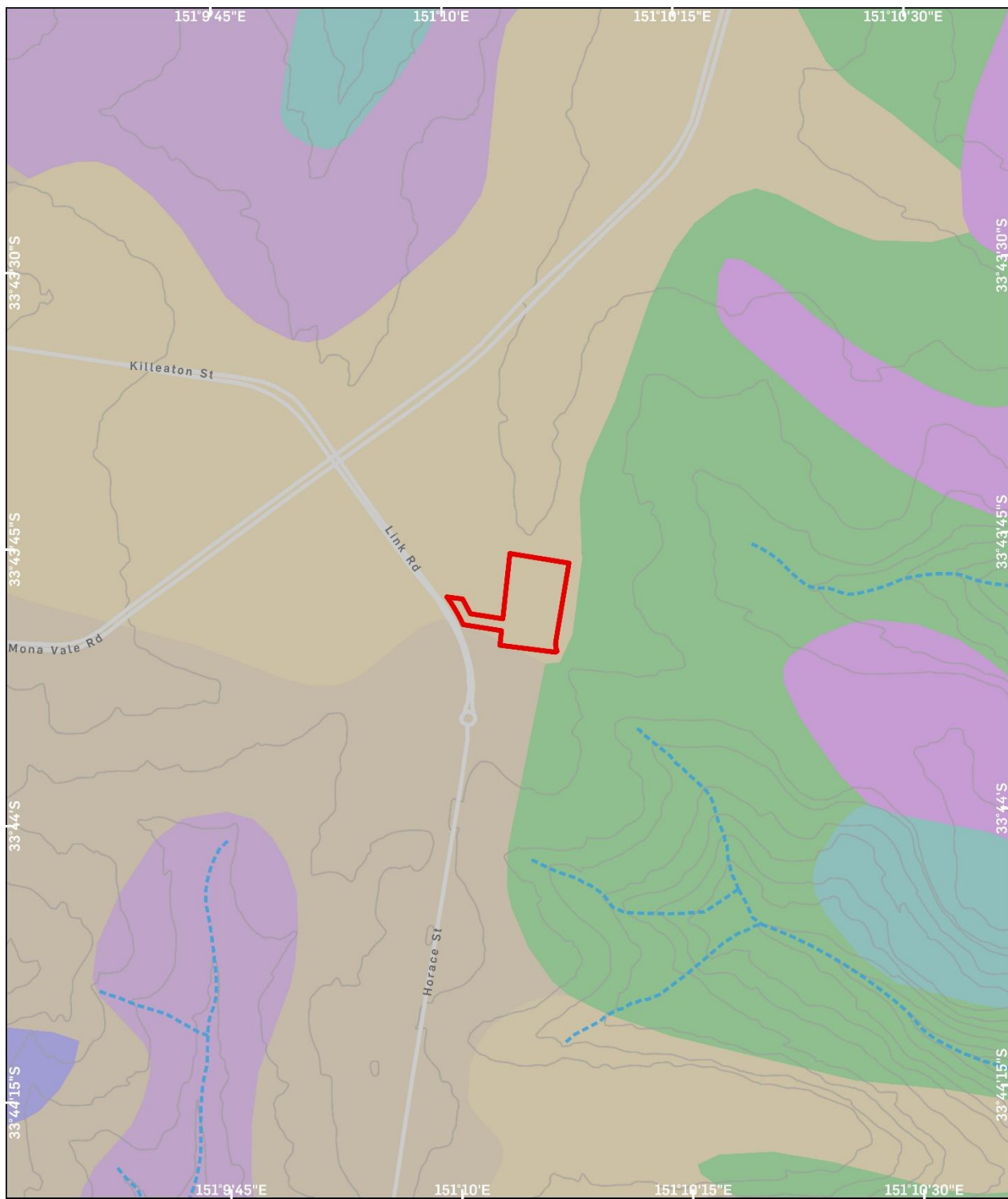


Figure 5 – Soil landscapes and Hydrology

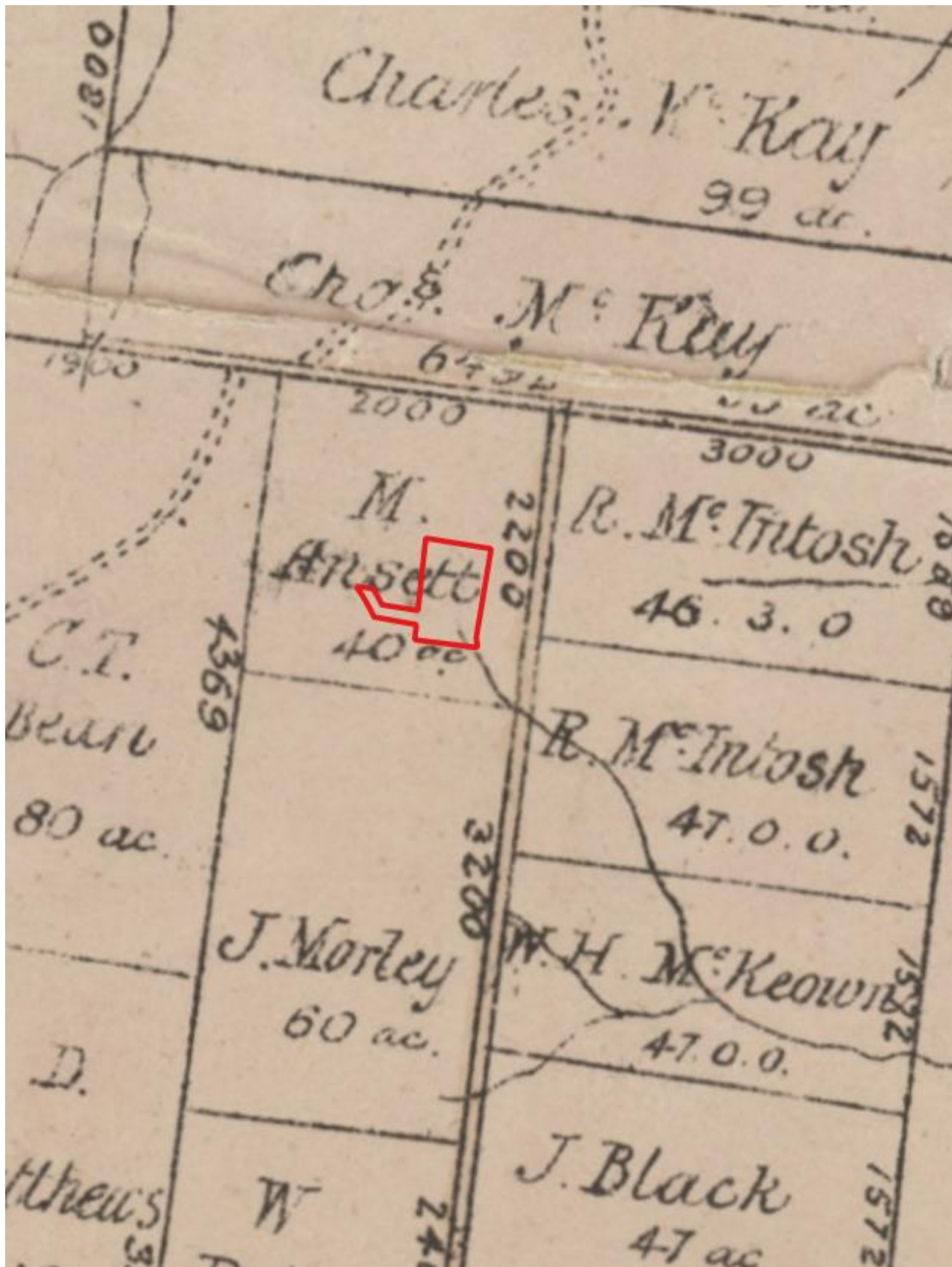


Figure 6 – 1881 Map of Gordon showing location of former waterway within subject area

Source: State Library NSW FL15214344, with Urbis overlay

3.2.2 Historical Ground Disturbance

Disturbance to the natural landscape, either through human activity (e.g., clearing of vegetation, ploughing and construction of buildings) or natural processes (e.g., erosion), reduces the likelihood of deposited Aboriginal objects being retained, either through destruction of the Aboriginal objects or their removal. Ground disturbance may affect the natural topsoil (A-horizon), within which subsurface Aboriginal archaeological remains are typically found, and other surface features associated with Aboriginal objects, such as trees, rock platforms and rock overhangs.

For the purpose of the present assessment, historical ground disturbance is rated according to the following scheme:

- **High:** all or most topsoil has been removed, with at most only a small part of the lower portion of topsoil possibly remaining intact
- **Moderate:** the upper part of the topsoil has been substantially disturbed or removed, but a substantial amount remains intact
- **Low:** little or no disturbance or removal of topsoil, with all or most topsoil remaining intact

The degree of disturbance is relative to the depth of the natural topsoil. For example, disturbance of the upper 30 cm of a natural soil profile by ploughing may be high if the topsoil only 30 cm deep, but only moderate if the topsoil is 1 m deep.

The subject area's colonial occupation dates back to the early 19th century with the dispossession of the surrounding region from the Dharug people and subsequent redistribution of lands to newly arrived colonisers. The subject area formed part of a 40 acre land grant, dubbed 'Macquarie Farm'. The grant was promised to Michael Ansell in 1816 and issued in 1831 (Figure 6 above). Two years later Ansell sold the property to Thomas Hyndes. Historical records do not indicate much activity during Ansell's and Hyndes' s tenure of land, but it is likely that that timber may have been felled (McGregor 1984).

It wasn't until the 1880s that the subject area was more substantially developed by colonial settlers. By 1877 the property was owned by Richard Nancarrow and his family. Shortly after three buildings were established in the centre of the grant, a farmhouse, a stable and laundry. The land surrounding the farmstead was used for orcharding. Of the original buildings the laundry was the only structure located within the subject area, specifically on the northwest corner. Additionally, a poultry shed and a herb garden were established to the south and west of the laundry building during the 1890s when the farm was leased and managed by Richard Dallimore and his family (McGregor 1984) (Figure 7).

Aerial imagery from 1930 illustrates the main farm buildings including the laundry and the remainder of the subject area cleared of vegetation (Figure 8). During the 1930s the catholic church bought Macquarie Farm and built a religious college just north of the subject area and continued to farm the land (McGregor 1984). Further aerial imagery indicates the site remained unchanged between the early 1940s (Figure 9) and late 1960s. Ephemeral traces of the first order tributary stream to the Middle Harbour Creek can be seen in the 1965 aerial (Figure 10). By 1970 more substantial works have been carried with the central portion of the subject area being excavated and redeposited immediately to the south to create a levelled surface (Figure 11). By 1975 the laundry building appears to have been demolished (Figure 12) and by the 1980s it appears the majority of the subject area was being used for recreational purposes (Figure 13). The construction of a nearby school led the subject area to be used as sports field by the students with vehicular access from the, then, newly established Link Road (Figure 14). By 2004, two tennis courts were established on the northwestern corner of the subject area (Figure 15). Between then and now, no further land change occurred (Figure 16).

A small central portion of the subject area has been subject to a **High** level of disturbance as a result of the earthworks undertaken by 1970. A portion on the northwestern corner of the site has been subject to a **Moderate** level of disturbance with the construction of a laundry building in the 1880s and tennis courts the early 2000s. Similarly, the southern portion of the subject area has also seen a **Moderate** level of disturbance caused by colonial activity dating back to late 19th century. Farming activities have likely displaced potential artefacts and further 20th century earthworks have likely displaced potential Aboriginal objects.

The assessed ground disturbance for the present subject area is mapped in Figure 17. The relevance of historical ground disturbance for the present assessment is discussed in the application of the predictive model to determining Aboriginal archaeological potential in Section 3.4.2 below.

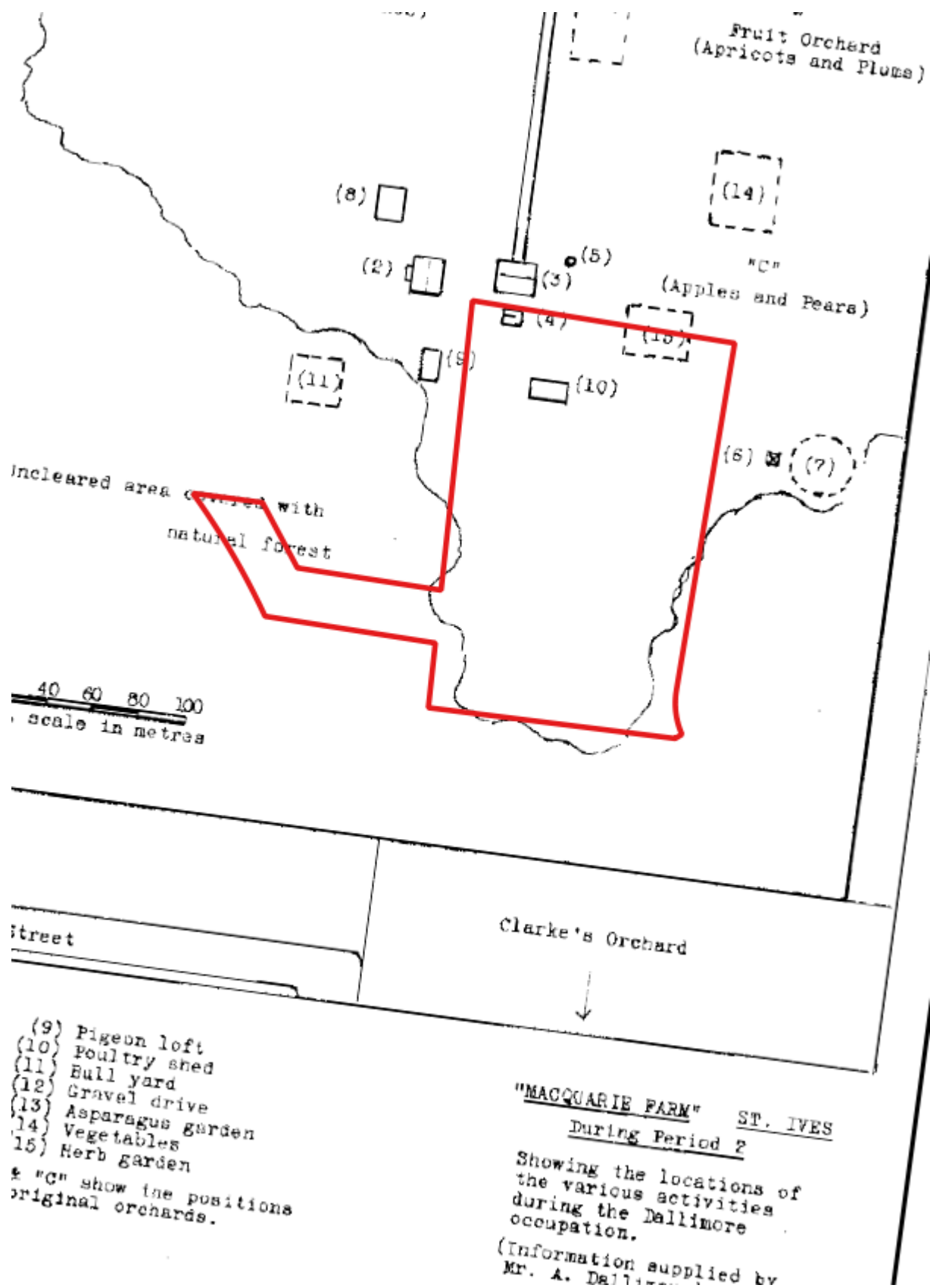


Figure 7 – Illustration of buildings relating to the occupation of the subject area (red outline) between the 1880s and 1900s
Source: McGregor, 1984 "Macquarie Farm St. Ives"

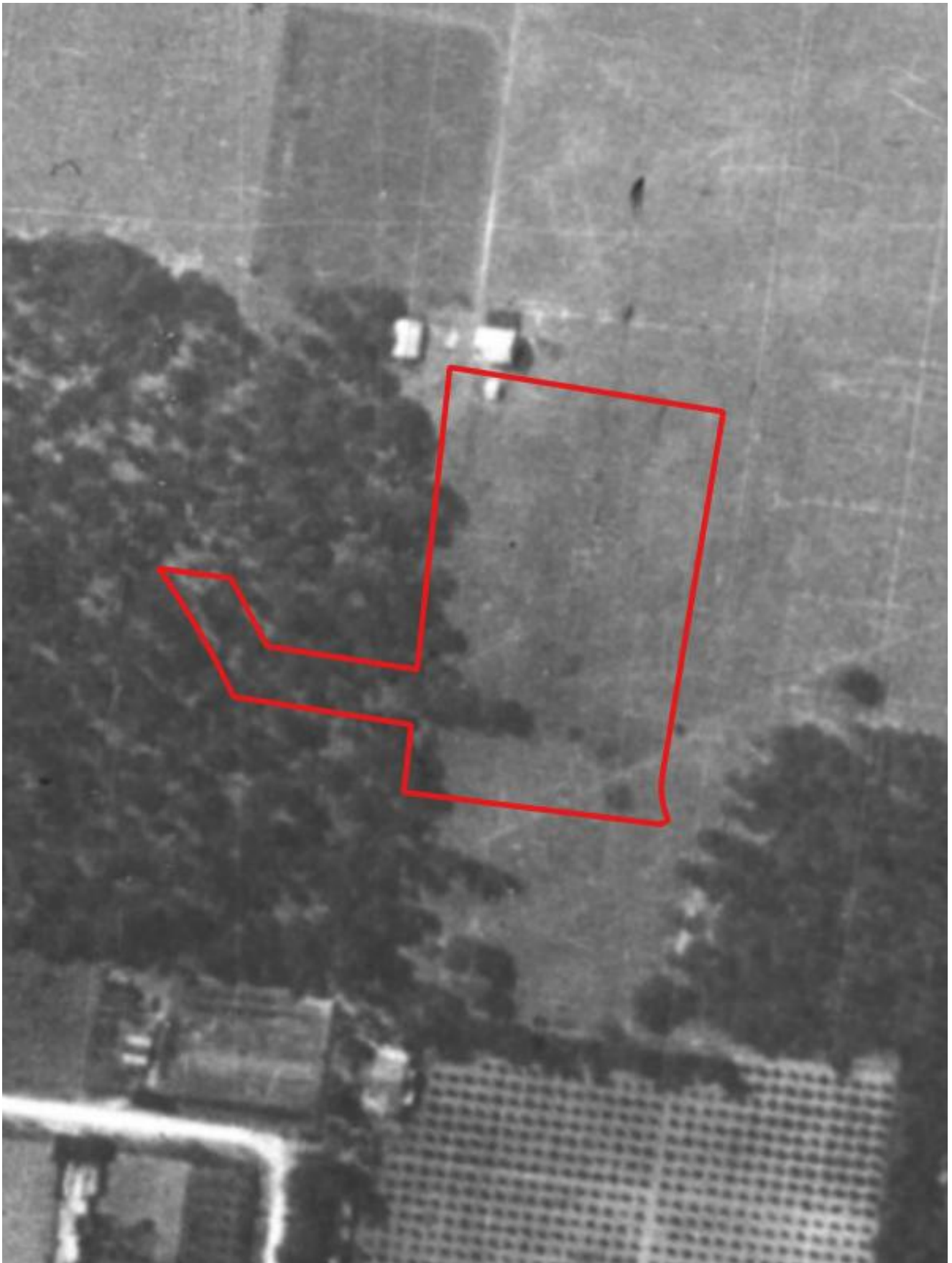


Figure 8 – Aerial image of subject area (red outline), 1930

Source: Commonwealth Historical Aerial Photo Collection MAP3424_frame1214

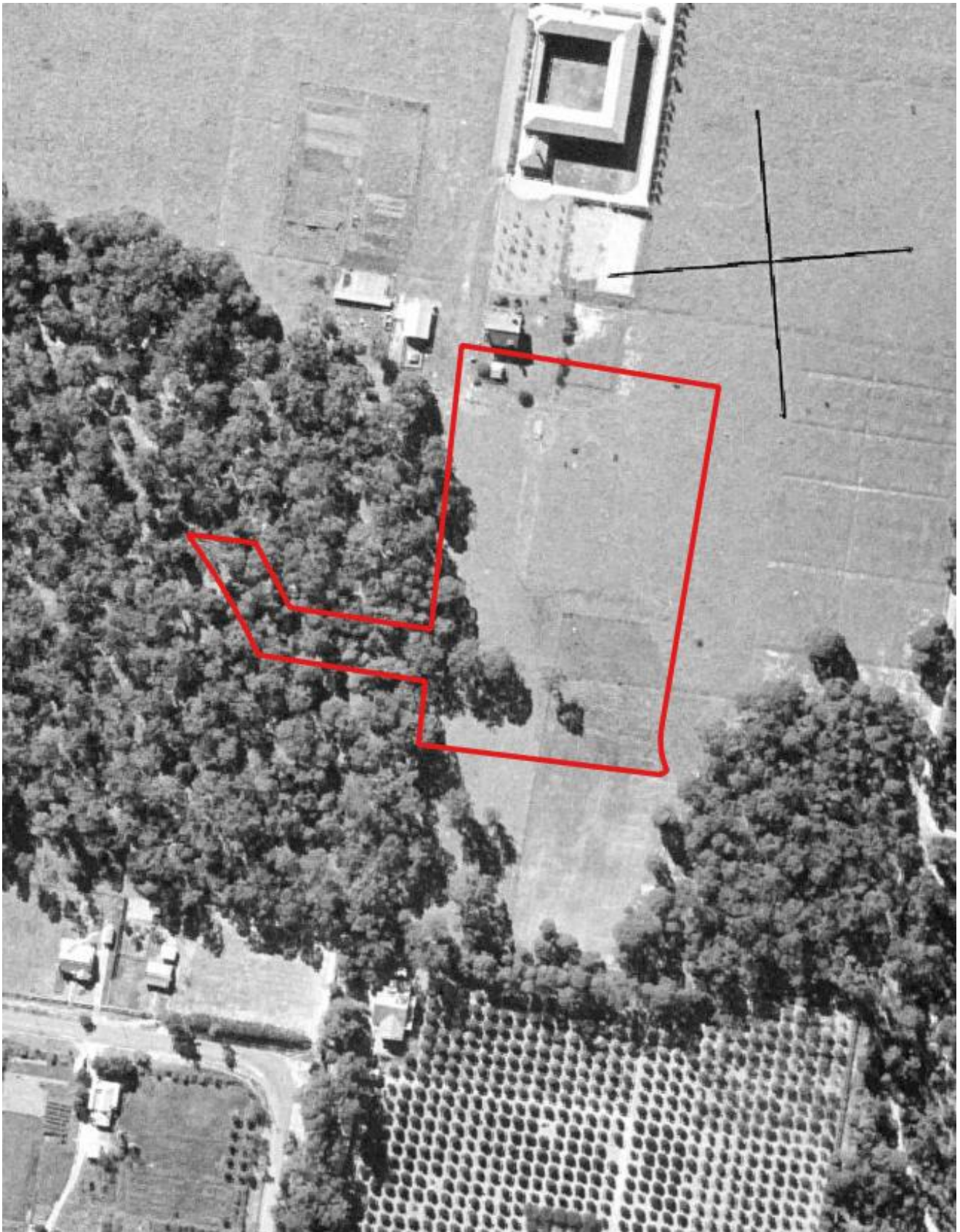


Figure 9 – Aerial image of subject area (red outline), 1943

Source: NSW Government, Historical Imagery Viewer

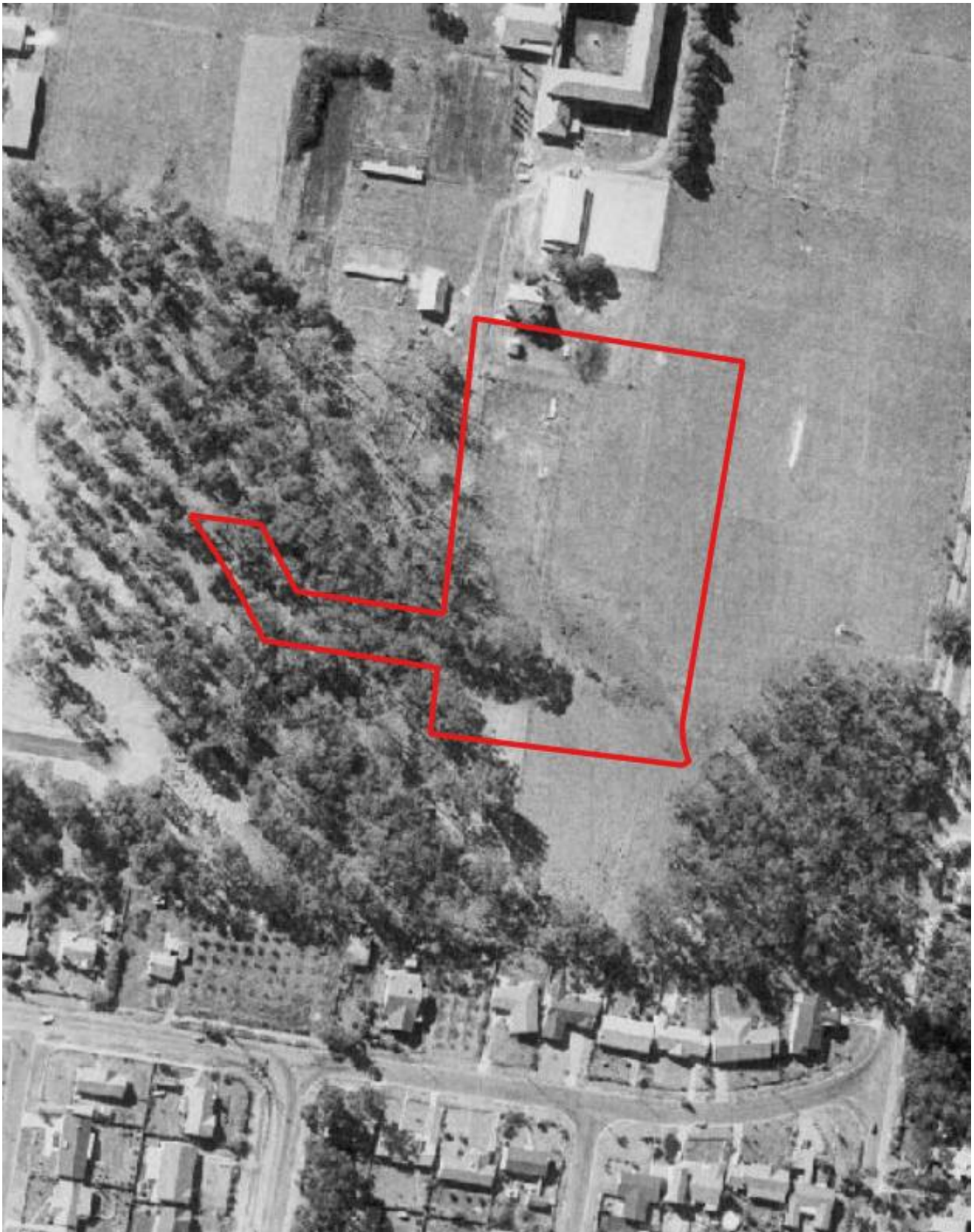


Figure 10 – Aerial image of subject area (red outline), 1965

Source: NSW Government, Historical Imagery Viewer



Figure 11 – Aerial image of subject area (red outline), 1970

Source: NSW Government, Historical Imagery Viewer



Figure 12 – Aerial image of subject area (red outline), 1975
Source: NSW Government, Historical Imagery Viewer



Figure 13 – Aerial image of subject area (red outline), 1982

Source: NSW Government, Historical Imagery Viewer



Figure 14 – Aerial image of subject area (red outline), 1989

Source: NSW Government, Historical Imagery Viewer



Figure 15 – Aerial image of subject area (red outline), 2004

Source: NSW Government, Historical Imagery Viewer



Figure 16 – Aerial image of subject area (red outline), 2025

Source: NearMap



Subject Area
 Moderate Disturbance
 High Disturbance

Figure 17 – Disturbance across subject area.

Source: NearMap with Urbis Overlay

3.3 Local & Regional Character

The evidence from Sections 3.1 and 3.2 is synthesised below to highlight the main issues and regional character of Aboriginal land use and the material traces that it has produced, in accordance with Requirement 11 of the Code of Practice.

Archaeological evidence indicates that Aboriginal land use in the local area and region is heavily reliant on waterways, particularly the Middle Harbour Creek and its tributaries. Stone tools are likely to have played a significant role in the lives of the local Aboriginal people, with lithic artefacts being strongly represented in the known archaeological record. Lithic artefacts are likely to have been discarded near waterways, with higher densities likely occurring near major waterways where land use was likely more intensive. Other evidence of occupation is also focussed on waterways, such as burials and grinding grooves, all of which may be associated with the rock overhangs and outcrops of Hawkesbury sandstone that occur along major waterways in the region.

3.4 Archaeological Potential

The Aboriginal archaeological potential of an area is the likelihood that it retains material evidence of past Aboriginal land use. The purpose of undertaking an assessment of Aboriginal archaeological potential is to inform the sampling strategy for the subsequent archaeological survey, to determine if an archaeological test excavation is required and, if so, inform the sampling strategy for that excavation.

3.4.1 Predictive Model

A predictive model for the present assessment has been formulated based on existing predictive models (Section 3.1.5) and the local and regional character summarised above (Section 3.3).

The following landscape features are considered relevant for indicating likely past Aboriginal land use in the region:

- Areas within 200 m of waters including freshwater and the high tide mark of shorelines.
- Areas located within a sand dune system.
- Areas located on a ridge top, ridge line or headland.
- Areas located within 200 m below or above a cliff face.
- Areas within 20 m of or in a cave, rock shelter, or a cave mouth.

The above predictive model is consistent with the Due Diligence Code.

Aboriginal archaeological potential is further dependent on erosional transport and historical ground disturbance. Archaeological material is more likely to accumulate in aggraded landforms than eroded landforms, while higher ground disturbance reduces the likelihood of archaeological material surviving.

Synthesising the above predictors, Aboriginal archaeological potential is rated according to the following scheme:

- **Very High:** at least one relevant landscape feature, low ground disturbance and an aggraded landform
- **High:** at least one relevant landscape feature and either: (i) low ground disturbance and an eroded landform; or (ii) moderate ground disturbance and an aggraded landform
- **Moderate:** at least one relevant landscape feature, moderate ground disturbance and an eroded landform
- **Low:** no relevant landscape features and low or moderate ground disturbance
- **Very Low:** high ground disturbance

Expected site features are based on the following associations landscape features:

- High density sub-surface artefact sites are likely to occur in the vicinity of major watercourses, while low density sub-surface artefact sites are more likely in areas away from major watercourses.

The predictive model described above is applied in the following section to determine the Aboriginal archaeological potential of the subject area and likely site features.

3.4.2 Assessment of Potential

Based on the predictive model outlined in the preceding section, the archaeological potential of the present subject area is assessed to be **Low**. The assessed archaeological potential of the subject area is mapped in Figure 18.

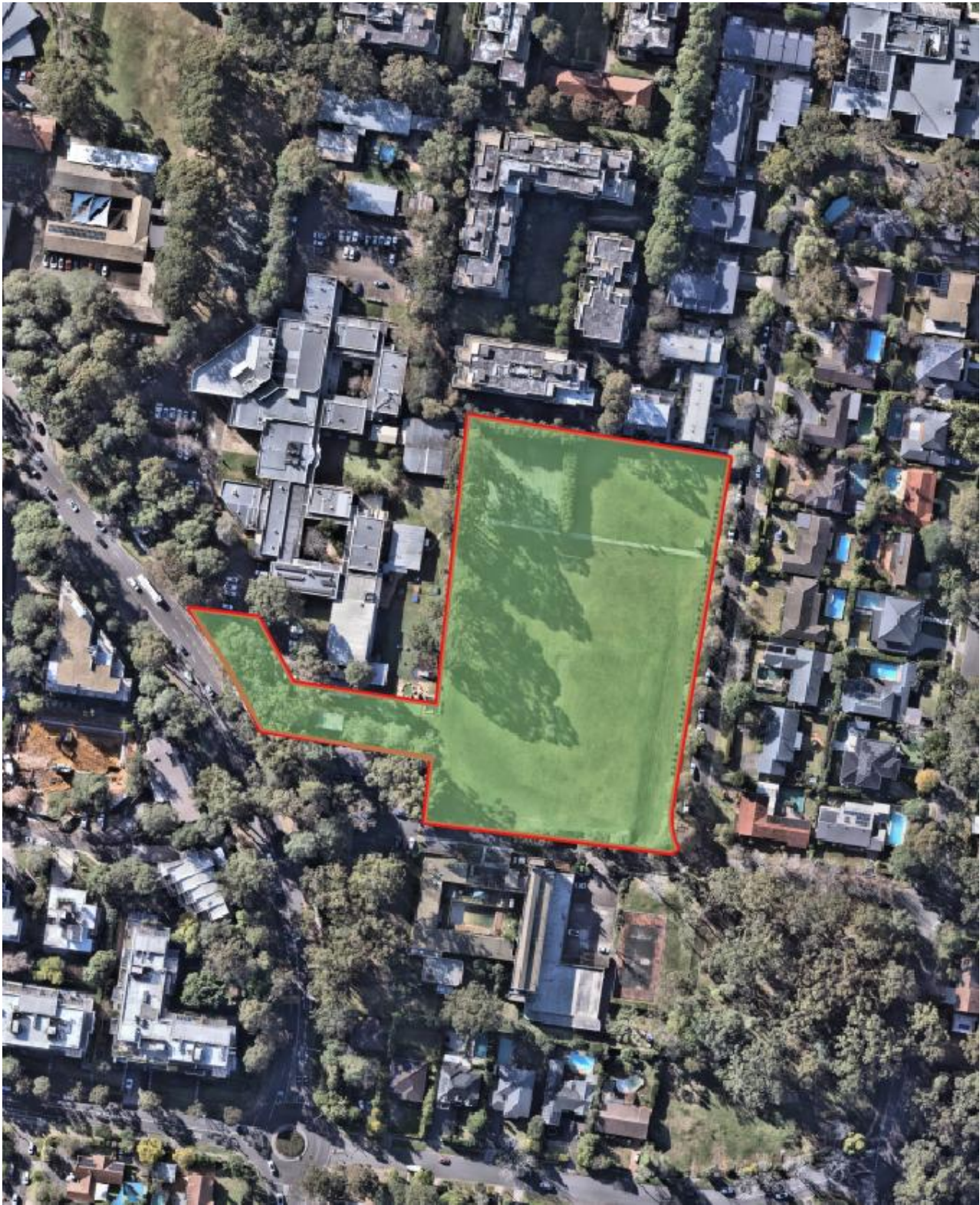
The subject area is located within 200 m of a natural waterway, which is considered indicative of likely past Aboriginal land use under the predictive model presented in the preceding section. Based on previously registered sites in the region, past Aboriginal land use would likely be expressed as low-density subsurface deposits and surface scatters of discarded stone artefacts. Potential Aboriginal site features to be retained within the subject area are **artefacts**. All other site types are unlikely to occur in the subject area due to the absence of the requisite resource or a general rarity of those site types in the region and NSW.

Historical ground disturbance ranges from **Moderate** to **High** (Section 3.2.1), meaning intact natural topsoils are not likely to be present in the subject area. There are no areas of remnant native trees as the subject area was cleared of natural vegetation during the late-18th Century. The geology indicates that sandstone rock outcrops are unlikely to be present. Finally, the subject area is impacted by erosion, which may have caused the displacement of topsoil and other surface material (including archaeological deposits) from across the entire subject area.

Synthesising the above factors according to the archaeological rating scheme presented in the preceding section, it is determined that there is:

- **Low potential** for Aboriginal objects to occur due to high levels of historical ground disturbance

The assessed ground disturbance for the present subject area is mapped below in Figure 17.



 **Subject Area**  **Low Potential**

Figure 18 – Aboriginal archaeological potential

3.5 Summary

The desktop assessment of the subject area is summarised as follows:

- No Aboriginal sites were identified within the subject area, or within 500m of the subject area.
- The subject area is located within 200m of a natural waterway, which is considered indicative of past Aboriginal land use under the Due Diligence Code.
- The subject area has been impacted by **moderate to high historical ground disturbance** caused by the clearance of vegetation, ploughing, the construction and demolition of buildings as well as earthworks
- There is **low potential** for Aboriginal objects to occur within the subject area, including artefacts.

4

Physical Assessment

4 Survey

A visual inspection was undertaken to confirm the assessment of archaeological potential within the subject area and to determine if any Aboriginal objects were present as surface expressions. The visual inspection of the subject area was undertaken on 22 January 2026 by Juliet Scholefield (Urbis Consultant Archaeologist). The visual inspection was undertaken in overcast conditions. Ground Surface Visibility (GSV) was estimated to be less than 5% across the subject area, with the majority covered by turf and hardstand.

No Aboriginal objects were identified during visual inspection of the subject area. The visual inspection revealed clear and observable modification to the ground surface.

The sports field occupying the south of the subject area is significantly raised above the level of College Crescent. This is evident in a steep downwards slope along the sites eastern boundary (Figure 19 & Figure 20). A slight rise from the level surface of the playing field can also be seen to the northeast and west of the site (Figure 21 & Figure 22).

To the northwest of the subject area, the tennis courts are raised about 1m above the level of the playing field (Figure 23 & Figure 24). The grassed area to the northeast of the subject area is raised to a similar level. Exposures were observed within this portion of the subject area, revealing modern fill with gravel inclusions (Figure 25), as well as evidence of below ground service lines for water and sewerage (Figure 26).

Overall, the playing field portion of the subject area appears to have been cut down to the north and east and built up to the east to create a level playing surface. Modern fill as well as disturbance in the form of below ground services was also observed within the northern portion of the subject area. Table 6 and Table 7 below provide a summary of the survey. While visibility was around 5%, exposure was assessed to be 0% due to the presence of introduced fill across the site. As such, effective coverage was calculated to be zero, as outlined in Table 7 below, despite thorough survey coverage.

Table 6 – Survey coverage

Survey unit	Landform	Survey unit area (sq m)	Visibility %	Exposure %	Effective coverage area (sq m) (= survey unit area x visibility % x exposure %)	Effective coverage % (= effective coverage area/ survey unit area x 100)
1	Slope	16575sqm	<5%	0%	0	0%

Table 7 – Landform summary

Landform	Landform area (sq m)	Area effectively surveyed (sq m) (= effective coverage area)	% of landform effectively surveyed (= area effectively surveyed / landform area x 100)	Number of sites	Number of artefacts or features
Slope	16575sqm	0sqm	0%	0	0



Figure 19 – View south along eastern boundary of the site, showing slope from level of playing field down to College Crescent



Figure 20 – View northeast from eastern boundary, showing steep slope downwards from level of playing field



Figure 21 – Northeast corner of the site, showing slight slope upwards from level of playing field



Figure 22 – View west, showing slight slope upwards from level of playing field



Figure 23 – View east, showing slope from level of tennis courts down to the sports field



Figure 24 – View north, showing rise in level from playing field to tennis courts



Figure 25 – Exposure to the northeast of the subject area, showing modern fill with gravel inclusions



Figure 26 – Drainage within grassed area to the northeast of the subject area

5

Significance Assessment

5 Significance Assessment

The following is an assessment and discussion of the cultural significance of the subject area, made in consultation with the RAPs. The assessment follows principles and procedures outlined in the Burra Charter the Assessment Guidelines.

5.1 Framework for Assessment

The Burra Charter defines cultural significance as being derived from the following values: social or cultural value, historic value, scientific value and aesthetic value. Aesthetic, historic, scientific and social values are commonly interrelated. All assessments of heritage values occur within a social and historic context. Therefore, all potential heritage values will have a social component.

Heritage significance is assessed by considering each cultural or archaeological site against the significance criteria set out in the Assessment Guidelines. The Assessment Guidelines require that the assessment and justification in a statement of significance includes a discussion of whether any value meets the following criteria:

- Does the subject area have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons? – social value.
- Is the subject area important to the cultural or natural history of the local area and/or region and/or state? – historic value.
- Does the subject area have potential to yield information that will contribute to an understanding of the cultural or natural history of the local area and/or region and/or state? – scientific (archaeological) value.
- Is the subject area important in demonstrating aesthetic characteristics in the local area and/or region and/or state? – aesthetic value.

Assessment of each value should be graded in terms that allow the significance to be described and compared (e.g. high, moderate, or low). In applying these criteria, consideration should be given to:

- Research potential: *does the evidence suggest any potential to contribute to an understanding of the area and/or region and/or state's natural and cultural history?*
- Representativeness: *how much variability (outside and/or inside the subject area) exists, what is already conserved, how much connectivity is there?*
- Rarity: *is the subject area important in demonstrating a distinctive way of life, custom, process, land-use, function or design no longer practised? Is it in danger of being lost or of exceptional interest?*
- Education potential: *does the subject area contain teaching sites or sites that might have teaching potential?*

The Aboriginal heritage significance of the subject area is assessed in the following section within the framework outlined above.

5.2 Assessment of Heritage Values

The following assessment of the social or cultural, historic, scientific and aesthetic values of the subject area has been prepared in accordance with the Assessment Guidelines.

In acknowledgment that the Aboriginal community themselves are in the best position to identify heritage values, the assessment is informed by consultation with the Aboriginal community undertaken as part of the ACHA (Section 2 above).

5.2.1 Social or Cultural Value

Social or cultural value encompasses the qualities for which a place has become a focus of spiritual, political, national or other cultural sentiment for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them. Places of social or cultural value have associations with contemporary community identity. These places can have associations with tragic or warmly remembered experiences, periods, or events. Communities can experience a sense of loss should a place of social or cultural value be damaged or destroyed. Social or cultural values can therefore only be identified through consultation with Aboriginal people.

Urbis was not provided with specific cultural values specific to the subject area during the consultation process.

5.2.2 Historic Value

Historic value encompasses the history of aesthetics, science and society. A place may have historic value because it is associated with a historic figure, event, phase or activity in an Aboriginal community. The significance of a place will be greater where evidence of the association or event survives in situ, or where the settings are substantially intact, than where it has been changed or evidence does not survive. However, some events or associations may be so important that the place retains significance regardless of subsequent treatment. Places may also have 'shared' historic values with other (non-Aboriginal) communities.

No historical associations between Aboriginal people and the subject area have been identified. The subject area is therefore unlikely to have historic value insofar as it relates to Aboriginal cultural heritage.

5.2.3 Scientific (Archaeological) Value

Scientific value relates to the importance of a landscape, area, place or object because of its rarity, representativeness and the extent to which it may contribute to further understanding and information. Information about scientific value will be gathered through any archaeological investigation undertaken.

The subject area is highly unlikely to retain any Aboriginal objects due to a high level of historical ground disturbance. Furthermore, if any Aboriginal objects are present, they are likely to be located within a highly disturbed context. The scientific (archaeological) value of the subject area is therefore assessed to be low.

Should any Aboriginal objects be identified within the subject area, the scientific (archaeological) value of those objects and the subject area should be reassessed.

5.2.4 Aesthetic Value

Aesthetic value of a place relates to the sensory, scenic, architectural and creative aspects of a place. It may include visual aspects, such as form, scale, colour, texture and material of the fabric, and the smells and sounds associated with the place and its use.

It is evident that the subject area is highly disturbed through clearance of vegetation, ploughing, the construction and demolition of buildings, as well as earthworks, in shallow topsoil. The present visual appearance and other sensory aspects of the subject area are unlikely to resemble those of the landscape of the local area as it existed prior to European contact. The subject area is therefore unlikely to have aesthetic value insofar as it relates to Aboriginal cultural heritage.

Individual Aboriginal objects may have aesthetic value in their own right. There are no known Aboriginal objects within the subject area that could be assessed for aesthetic value. In the event that any Aboriginal objects are identified within the subject area during the proposed works, these should be assessed for aesthetic value.

5.3 Statement of Significance

In summary, the assessment indicates that the subject area is unlikely to contain Aboriginal cultural heritage of scientific, historic or aesthetic value. While the area may have some broader social and cultural relevance to the Aboriginal community due to its proximity to local waterways, no specific or direct association with the subject area has been identified. The high level of disturbance has further reduced any potential heritage value. Overall, the subject area is assessed as having low Aboriginal heritage significance.

6

Impact Assessment

6 Impact Assessment

The following is an assessment of the potential impact of the proposed development on any Aboriginal objects and/or Aboriginal places within the subject area and the possible strategies for avoiding or minimising harm to those Aboriginal objects and/or Aboriginal places.

6.1 Framework for Assessment

The potential harm to Aboriginal objects and Aboriginal places that is likely to be caused by a proposed activity is the effect of that activity on the Aboriginal heritage values identified above. According to the NPW Act, 'harm' to an object or place includes any act or omission that:

- Destroys, defaces, or damages the object or place.
- Moves the object from the land on which it had been situated.
- Causes or permits the object or place to be harmed.

Harm does not include something that is trivial or negligible, such as picking up and replacing a small stone artefact, breaking a small Aboriginal object below the surface when you are gardening, crushing a small Aboriginal object when you walk on or off a track, picnicking, camping or other similar recreational activities.

The Assessment Guidelines define harm to Aboriginal objects and Aboriginal places as being either 'direct' or 'indirect':

- **Direct harm** may occur as the result of any activity which disturbs the ground including, but not limited to, site preparation activities, installation of services and infrastructure, roadworks, excavation, flood mitigation measures.
- **Indirect harm** may affect sites or features located immediately beyond or within the area of the proposed activity. Examples include, but are not limited to, increased impact on art in a shelter from increased visitation, destruction from increased erosion and changes in access to wild food resources.

The present assessment of potential harm follows the principles of ecologically sustainable development (ESD), in particular the precautionary principle and the principle of inter-generational equity:

- The **precautionary principle** states that full scientific certainty about the threat of harm should never be used as a reason for not taking measures to prevent harm from occurring.
- The **principle of inter-generational equity** holds that the present generation should make every effort to ensure the health, diversity and productivity of the environment, which includes cultural heritage, is available for the benefit of future generations. If a site type that was once common in an area becomes rare, the loss of that site (and site type) will result in an incomplete archaeological record and will negatively affect intergenerational equity.

Consideration of potential harm to Aboriginal objects and Aboriginal places according to ecologically sustainable development (ESD) principles allows for an understanding of the cumulative impact of the proposed activity and an understanding of how harm can be avoided or minimised, if possible.

6.2 Assessment of Potential Harm

The assessment of potential harm considers harm that may occur to both known Aboriginal objects and as yet unknown Aboriginal objects within the subject area.

The desktop assessment and site inspection identified no known Aboriginal objects within the subject area. Furthermore, due to high a level of disturbance across the entire subject area, it is unlikely that any as yet unknown Aboriginal objects are retained anywhere within the subject area. Therefore, any physical works within the subject area, including those presently proposed, are unlikely to cause either direct or indirect harm to Aboriginal objects.

6.3 Inter-Generational Equity

The cumulative impact of any development on Aboriginal sites relates to the extent of the proposed impact on the site and how this will affect both the proportion of this type of Aboriginal site in the area and the impact this destruction will have on Aboriginal cultural heritage values generally in the area.

As there are no known Aboriginal objects within the subject and there is very low potential for unknown Aboriginal objects to be retained, the proposed works are unlikely to negatively impact inter-generational equity.

6.4 Avoidance & Minimisation of Harm

All practicable measures must be taken to avoid harm (i.e. protect and conserve) any significant Aboriginal objects within the subject area along with their cultural heritage values. The precautionary principle states that full scientific certainty about the threat of harm should never be used as a reason for not taking measures to prevent harm from occurring.

If harm to Aboriginal objects and/or Aboriginal places is unavoidable, management strategies must be considered to minimise the harm. The type of management strategies proposed must be appropriate to the significance of Aboriginal heritage values, Aboriginal objects and/or Aboriginal places. Harm avoidance and minimisation measures must be feasible and within the financial viability of the proposed activity.

As it is unlikely that any Aboriginal archaeological material is retained within the subject area, no further archaeological investigation is recommended. As precautionary measures, it is recommended that unexpected archaeological finds and human remains procedures described below be adhered to.

6.4.1 Unexpected Archaeological Finds Procedure

To mitigate harm to any unknown Aboriginal objects within the subject area, it is recommended that the following unexpected archaeological finds procedure should be followed in the unlikely event that any archaeological material, or suspected archaeological material, is uncovered during any works within the subject area:

1. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Heritage NSW should be notified of the find through a Section 146 notification. Such management may require further consultation with the approval authority, preparation of a research design and archaeological investigation/salvage methodology.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject site may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

6.4.2 Human Remains Procedure

Should clearly identifiable human remains be uncovered anywhere within the subject site, the following procedure should be implemented:

1. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW.
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

In the event that bones are uncovered which may be human but cannot be confirmed by onsite staff, a suitably qualified archaeologist or heritage specialist should be contacted in the first instance to determine how to proceed.

7

Conclusion and Recommendations

7 Conclusions & Recommendations

The ACHA concluded that:

Conclusion 1 – Known Aboriginal Objects and Places

No known Aboriginal objects or Aboriginal places have been identified within the subject area, or within 500m of the buffer surrounding subject area. Aboriginal objects if present will be within a highly disturbed context.

Conclusion 2 – Sensitive Landscape Features

The subject area is located within 200m of a natural waterway, which is considered indicative of past Aboriginal land use under the Due Diligence Code.

Conclusion 3 – Ground Disturbance

The subject area has been impacted by **moderate to high historical ground disturbance** caused by the clearance of vegetation, ploughing, the construction and demolition of buildings as well as earthworks

Conclusion 4 – Archaeological Potential

There is **low potential** for Aboriginal objects to occur due to moderate to high levels of historical ground disturbance.

Conclusion 5 – Significance Assessment

The subject area is assessed as having **low** Aboriginal heritage significance, with no identified scientific, historic or aesthetic values, no specific Aboriginal associations, and a high level of disturbance further limiting any heritage value.

Conclusion 6 – Impact Assessment

As there are no known Aboriginal objects within the subject area and it is unlikely to retain any as yet unknown Aboriginal objects, the proposed physical works are unlikely to cause either direct or indirect harm to Aboriginal objects or negatively impact inter-generational equity.

The ACHA recommends that

▪ Recommendation 1 – Submission of Report

A copy of this report should be submitted with the Environmental Impact Statement (EIS) in support of SSD- 98363228.

▪ Recommendation 2 – No Further Archaeological Investigation

As the proposed works are unlikely to cause harm to Aboriginal objects, it is recommended that no further investigation is required for the present development. The proposed development can proceed in line with the Archaeological Unexpected Finds Procedure and Human Remains Procedure outlined below.

▪ Recommendation 3 – Unexpected Archaeological Finds Procedure

Should any archaeological deposits be uncovered during any site works following lodgement and approval of SSDA, the following steps must be implemented:

1. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Heritage NSW/ Place Making NSW should be notified of the find through a Section 146 notification. Such management may require further

consultation with the approval authority, preparation of a research design and archaeological investigation/salvage methodology.

4. Depending on the significance of the find, reassessment of the archaeological potential of the subject site may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW or Place Making NSW.

▪ **Recommendation 4 – Human Remains Procedure**

Should clearly identifiable human remains be uncovered anywhere within the subject site following lodgement and approval of SSDA, the following procedure should be implemented:

1. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW.
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

In the event that bones are uncovered which may be human but cannot be confirmed by onsite staff, a suitably qualified archaeologist or heritage specialist should be contacted in the first instance to determine how to proceed.

8

References

8 References

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Disclaimer

This report is dated 30 June 2026 and incorporates information and events up to that date only and excludes any information arising, or event occurring, after that date which may affect the validity of Urbis Ltd (**Urbis**) opinion in this report. Urbis prepared this report on the instructions, and for the benefit only, of Equity Development Management (**Instructing Party**) for the purpose of Aboriginal Cultural Heritage Assessment (**Purpose**) and not for any other purpose or use. To the extent permitted by applicable law, Urbis expressly disclaims all liability, whether direct or indirect, to the Instructing Party which relies or purports to rely on this report for any purpose other than the Purpose, and to any other person which relies or purports to rely on this report for any purpose whatsoever (including the Purpose).

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This report has been prepared with due care and diligence by Urbis and the statements and opinions given by Urbis in this report are given in good faith and in the reasonable belief that they are correct and not misleading, subject to the limitations above.

Appendix A: Proposed Development Plans

Appendix B: Basic and Extensive AHIMS Search Results

Appendix C: Registered Aboriginal Party Consultation Log

Date	Time	Mode	Contacted Party	Contacting Party
Stage 1.1 – Native Title				
22 October 2025	9:01am	Email	National Native Title Tribunal	Urbis
22 October 2025	4:26pm	Email	Urbis	National Native Title Tribunal
Stage 1.2 – Identifying Aboriginal Parties				
16 October 2025	10:11am	Email	All Relevant Agencies	Urbis
16 October 2025	10:24am	Email	Urbis	Metropolitan LALC
17 October 2025	9:22am	Email	Urbis	ORALRA
17 October 2025	11:51am	Email	Urbis	GS LLS
20 October 2025	5:30pm	Email	Urbis	HNSW
Stage 1.3 – Registration of Aboriginal Parties				
30 October 2025	12:01am	Newspaper AD	Public	Urbis
31 October 2025	10:01am	Email	Listed RAPs	Urbis
31 October 2025	11:03am	Email	Urbis	Didge Ngunawal Clan
2 November 2025	9:29am	Email	Urbis	Barraby Cultural Services & Yurrandaali
2 November 2025	9:30am	Email	Urbis	Yulay Cultural Services
2 November 2025	8:34pm	Email	Urbis	A1 Indigenous Services
3 November 2025	3:39pm	Email	Urbis	Widescope Indigenous Group
4 November 2025	12:21pm	Email	Urbis	Kamilaroi-Yankuntjatjara Working Group
7 November 2025	6:07am	Email	Urbis	Gadhungal Marring
10 November 2025	10:15pm	Email	Urbis	Butucarbin Aboriginal Corporation
16 November 2025	11:51pm	Email	Urbis	Corroboree Aboriginal Corporation

18 November 2025	6:00pm	Email	Urbis	Muragadi Heritage Indigenous Corporation
Stage 1.6 – Provision of RAP Details				
4 November 2026	2:27pm	Email	Metro LALC	Urbis
4 November 2026	2:29pm	Email	Heritage NSW	Urbis
Stage 2/3 – Provision of Project Information & Methodology				
21 November 2025	10:51am	Email	Registered RAPs	Urbis
3 December 2025	1:38pm	Email	Urbis	Kamilaroi-Yankuntjatjara Working Group
6 December 2025	5:26pm	Email	Urbis	A1 Indigenous Services
Invitation to Site Visit				
16 January 2026	3:55pm	Email	A1 Indigenous Services	Urbis
21 January 2026	10:52am	Email	A1 Indigenous Services	Urbis
Stage 4 – Provision of Draft ACHA				
20 March 2026	10:04am	Email	Registered RAPs	Urbis
1 April 2026	12:51pm	Phone Call	Didge Ngunawal Clan	Urbis
1 April 2026	1:01pm	Email	Urbis	Didge Ngunawal Clan
1 April 2026	1:04pm	Phone Call	Muragadi Heritage Indigenous Corporation	Urbis
7 April 2026	3:06pm	Email	Registered RAPs	Urbis
29 June 2026	11:01am	Email	Yurrandaali	Urbis
29 June 2026	n/a	Mail (AUSPOST Tracking # 02 01017 91511 80060 50993).	Minnamunnung	Urbis

Appendix D: Registered Aboriginal Party Consultation Documentation



**Shaping cities
and communities
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