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Linda Zanotto
Senior Environmental Engineer
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Dear Linda,

RE: Request for an exemption from preparing an Aboriginal cultural heritage impact assessment report (ACHAR) – PDA-9031357 Proposed Cobra Bins Resource Recovery Facility Yennora

Aboriginal cultural heritage has been considered for the above-named project and this applicant seeking an exemption from preparing an Aboriginal cultural heritage impact assessment report (ACHAR) is provided for submission to Heritage NSW with supporting evidence.

The subject site

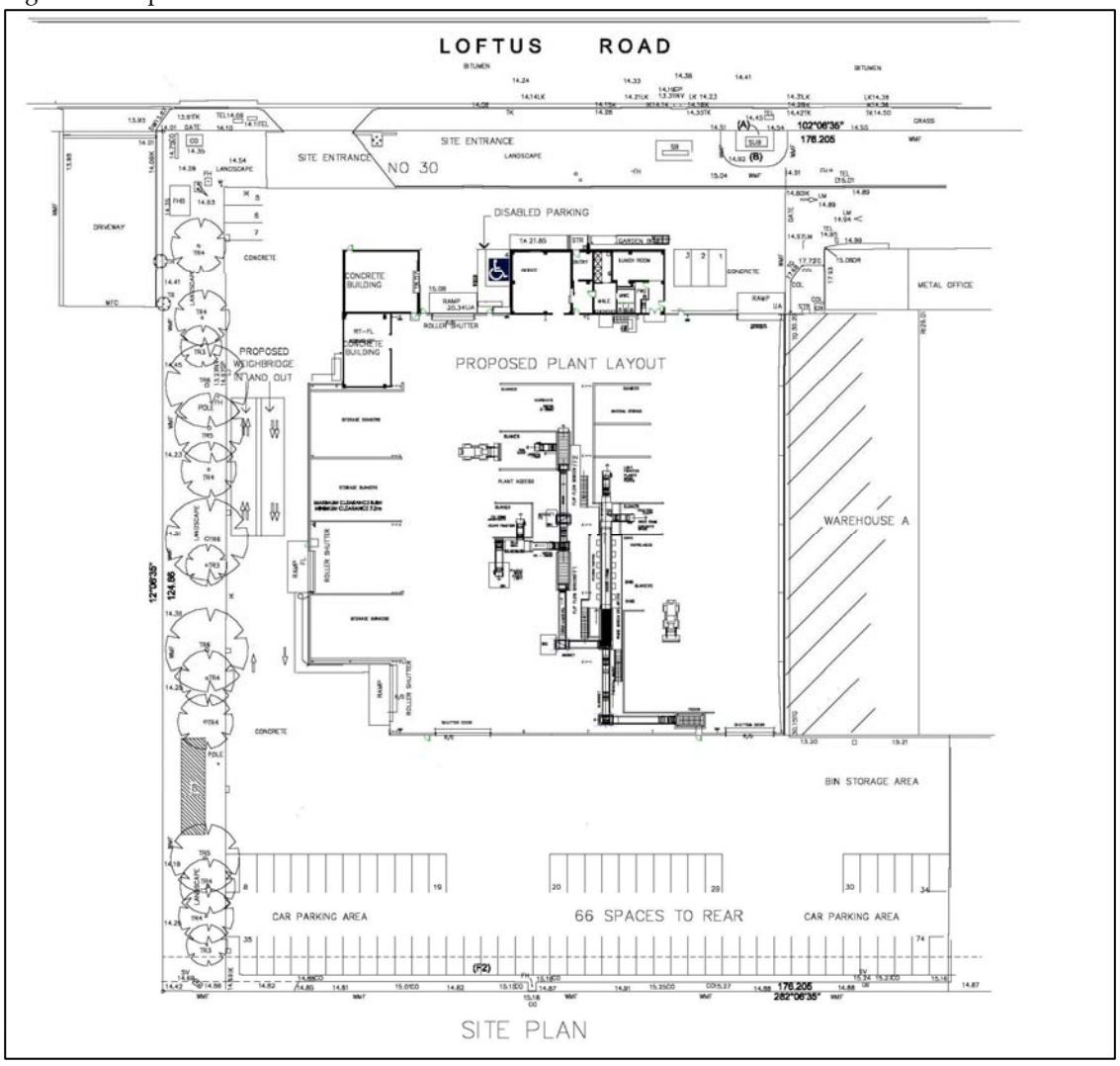
The subject site is located at 30 Loftus Road, Yennora and is within a developed industrial area of Yennora (Figure 1). The subject site is surrounded in all directions by existing industrial and commercial facilities. The site contains two warehouse buildings separated with a concrete wall. Two storey offices exist at the front of warehouse B and there are two roller door entrances at the front of the building. The site fronts Loftus Road and has an existing sealed driveway access into the site. The remainder of the site is sealed concrete hardstand and landscaped areas along the frontage to Loftus Road and along the western boundary. Warehouse A is not included in the development and is leased by an industrial equipment supplier.

Figure 1. Location of the project area

The proposed project

Cobra Waste Solutions Pty Ltd proposes to establish a resource recovery facility (RRF) at Warehouse A, 30 Loftus Road, Yennora (Figure 2). The facility would receive, handle and process Construction and Demolition C&D) and Commercial and Industrial (C&I) waste. The amount of waste to be received and processed is estimated to be up to 150,000 tonnes per year.

Figure 2. Site plan



The proposed facility will be installed within an existing industrial building on land within the established industrial area of Yennora. All resource recovery activities and storage of waste would be undertaken within the existing building. A new resource recovery system would be developed with components being pre-fabricated off site for installation. The system is likely to consist of a pre-sorting and material inspection area, feed hopper, series of waste/flip flop screens for sorting heavy and light material, conveyors, extractors/blowers, an enclosed picking station and three (3) magnets to enable efficient recovery and separation of material. Separated material would be captured in bays or bins at various points on the line.

Storage bunkers for waste would be established inside the building and would be constructed of concrete walls. There would be storage bunkers and bins located along the processing line to capture recovered material at various points. These storage bunkers and bins are expected to store a maximum of 1,500 tonnes

of waste wholly within the building at any one time based on the preliminary site layout. The layout of the system would facilitate a regular turnover of waste through the system therefore requiring limited storage space.

A water misting system would be installed within the building for dust suppression. Water for this purpose would be sourced from rainwater tanks to be installed at the site. No structural changes to the existing building will be required. The site contains existing infrastructure that would be utilised for the proposed development. This includes extensive fire protection equipment and a sprinkler system that is currently being installed within the building by the owner of the property. On-site car parking would be established in the rear hardstand area with consideration given to ease of on-site vehicle movements. Two weighbridges would also be installed on the eastern driveway of the site. The current site floor plan is provided in Figure 3 and the proposed floor plan is provided in Figure 4. As illustrated, all works will be within the existing disturbed footprint.

Figure 3. Existing floor plan

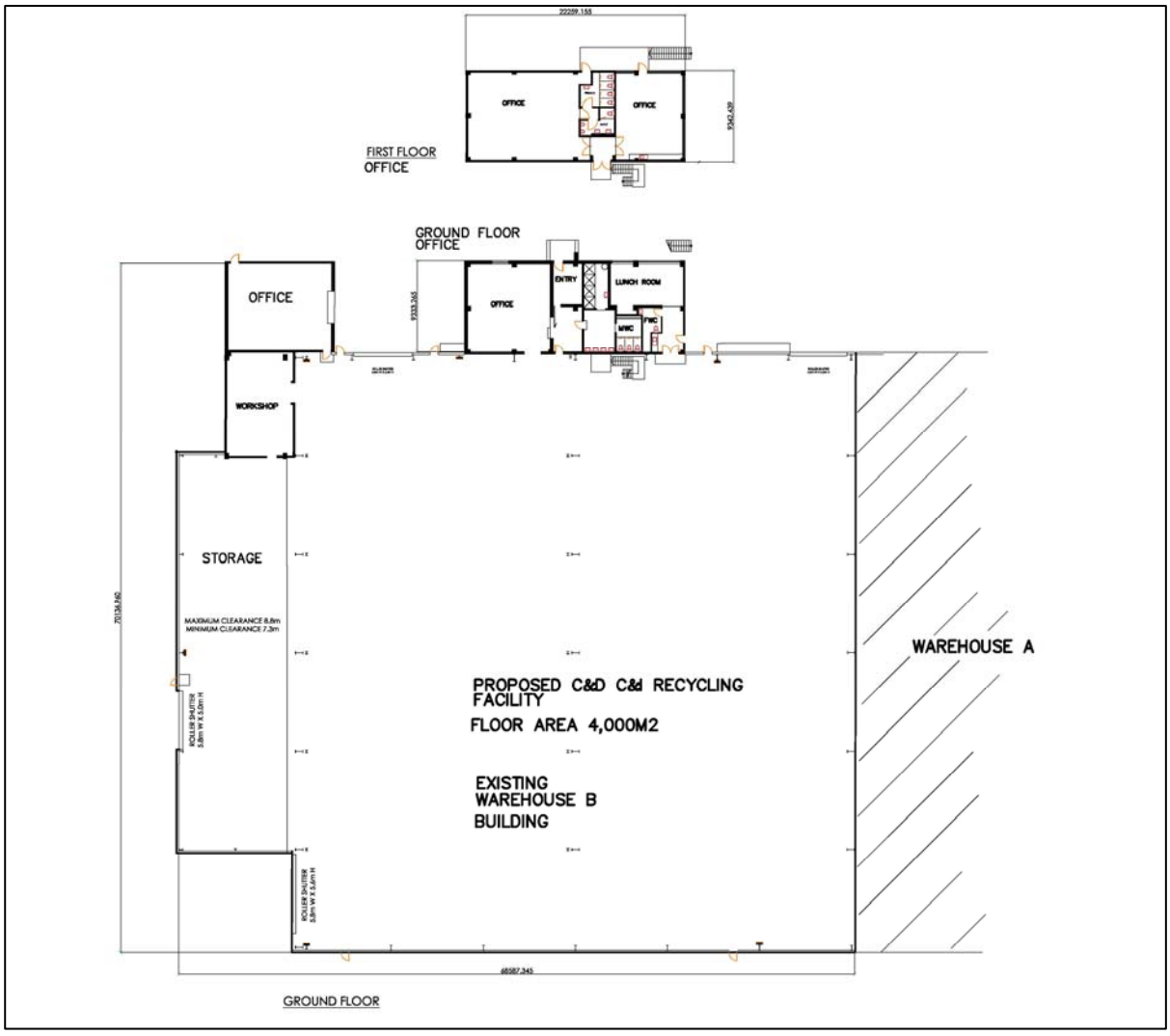
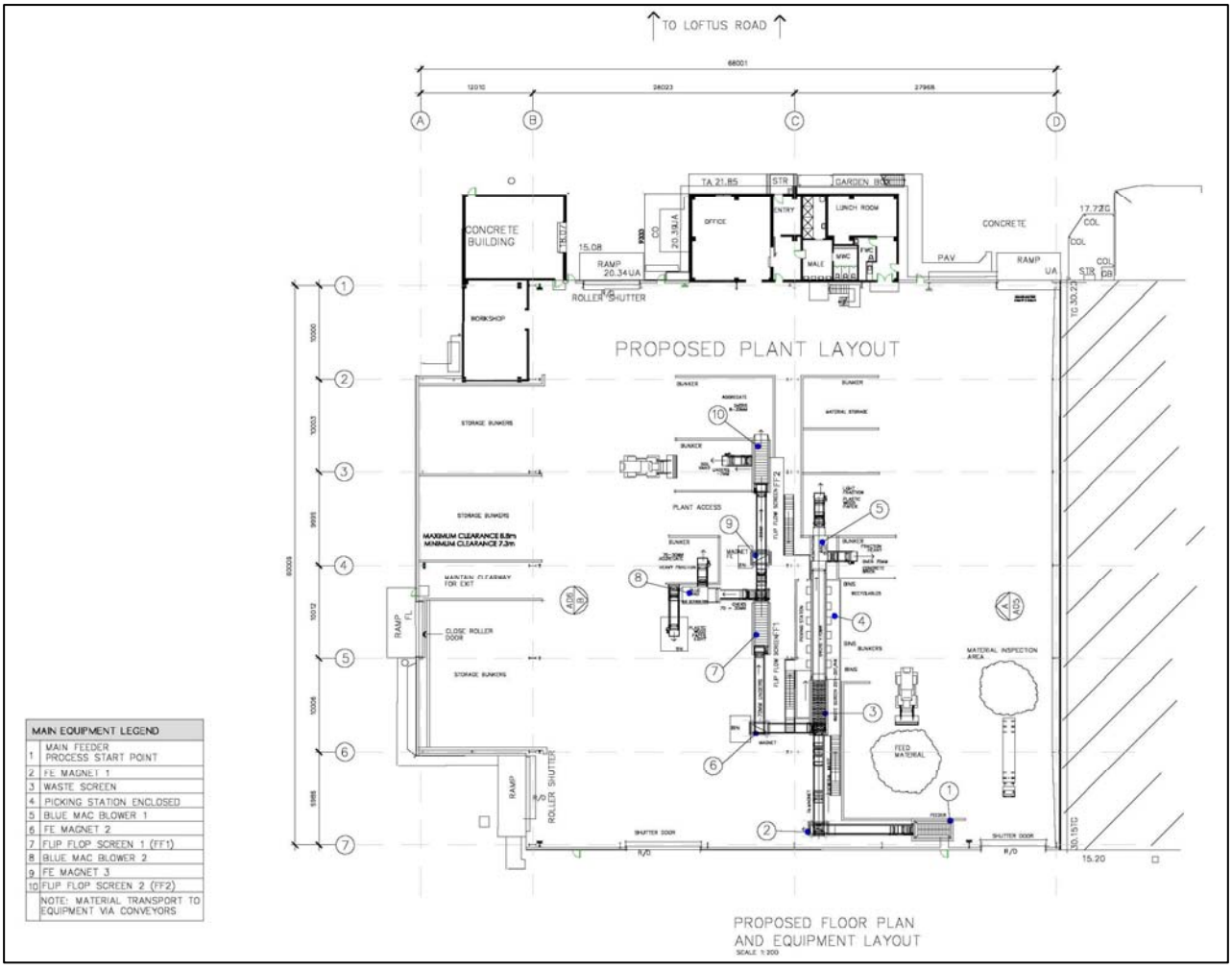


Figure 4. Proposed floor plan



Archaeological context

An AHIMS search was undertaken and this identified one site within 2 kilometres of the project area (Figure 5). The site is a PAD and is located approximately 2.6 kilometres south west of the project area and in close proximity to Prospect Creek (2nd order).

Figure 5. Location of the AHIMS site and project area

The project area is located in the Cumberland Plain and previous research of the regional and local area (e.g. McDonald and White 2010; Haglund 1978, Austral 1984, McDonald 2002, Oakley 2007, AMBS 2008, AHMS 2012, AECOM 2012; 2015; 2017, MCH 2020) have identified that artefact scatters and isolated finds are the most prominent site type. These assessments have also identified that both landform and distance to water were important factors in past Aboriginal land use. Elevated landforms within 50 metres of reliable water appear to have been the most favoured. In relation to fresh water sources, the higher the stream order (and more reliable water source) the higher the numbers of sites and site densities and both decrease with distance from the resource. These studies have highlighted that;

- a wide variety of site types are represented in the project area with open campsites and isolated artefacts by far the most common;
- lithic artefacts are primarily manufactured from silcrete and mudstone with a variety of other raw materials also utilised but in smaller proportions;
- lithic artefacts are predominantly flake pieces, broken flakes, flakes, cores and reduced numbers of tools;

- sites in proximity to ephemeral water sources or located in the vicinity of headwaters of upper tributaries (1st order streams) have a sparse distribution and density and contain little more than a background scatter;
- sites located in the vicinity of the upper reaches of minor tributaries (2nd order streams) also have a relatively sparse distribution and density and may represent evidence of localised one-off behaviour;
- sites located in the vicinity of the lower reaches of tributaries (3rd order creeks) have an increased distribution and density and contain evidence that may represent repeated occupation or concentration of activity;
- sites located in the vicinity of major tributaries (4th and 5th order streams/rivers) have the highest distribution and densities. These sites tend to be extensive and complex in landscapes with permanent and reliable water and contain evidence representative of concentrated activity;
- sites located within close vicinity at the confluence of any order stream may be a focus of activity and may contain a relatively higher artefact distribution and density; and
- the geomorphology of the region is dominated by an upper A horizon and a lower B horizon clays). Unit A and Unit B are interpreted as being Holocene and Pleistocene in age respectively and within the region, sites tend to occur on or within soil Horizon A or are often present at the interface of the A and B horizons. Within the A horizon the lowermost (in terms of vertical positioning) artefact assemblages tend to contain artefacts that are typically attributed to the mid-Holocene, as characterised by an increase in the number of backed artefacts.

The previous assessments also noted that all sites had been disturbed through past landuses including but not limited to clearing, agricultural and pastoral activities, residential developments, utilities, infrastructure and erosion. All excavations also identified highly disturbed subsurface deposits due to the above mentioned intensive long-term land uses.

The project area is situated over 600 metres east of Prospect Creek (2nd order) with the closest reliable water source (Georges River) located approximately 4 kilometres to the south and the Parramatta River located approximately 7.5 kilometres north east. Thus, the project area was not resourced in terms of fresh water availability nor any associated subsistence or medicinal resources and it is unlikely to have been utilised for more than transitory activities such s hunting and gathering. Evidence of such past Aboriginal land use manifests in the archaeological record as very low-density artefacts scatters and isolated finds of discarded artefacts.

Exemption

As outlined above the project area is located over 600 metres from fresh water and as water is necessary for survival, it is unlikely that the project area would have been used for anything more than hunting and gathering. This is supported by previous assessments that have identified proximity to water was one major factor in past Aboriginal land use and site location.

In terms of impacts to the archaeological record and the need for an ACHA, the project area has been significantly altered through the completed excavation and fill works across the entire subject site associated with the existing building and concreated areas. Such works remove the topsoils (A horizon) and at least the upper B horizon, where artefacts are found and as such the likelihood of any cultural materials remaining under the current project area is minimal to nil. As the proposed development will be maintained within the already highly disturbed footprint, an ACHA will not identify any sites in the project area and as such an exception is sought.

Should you wish to discuss this matter, please do not hesitate to contact me on 0412 702 396.

Yours sincerely,

for McCardle Cultural Heritage Pty Ltd

Dr. Penny McCardle
Principal Archaeologist
Forensic Anthropologist

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