

New high school for Schofield and Tallawong

Aboriginal Cultural Heritage Assessment

Prepared for NSW Department of Education

Final Report

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- Azka Abid (mapping)

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

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

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Summary

Biosis Pty Ltd (Biosis) was commissioned by NSW Department of Education (DoE) to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for a proposed future activity of the new high school for Schofields and Tallawong at 201 Guntawong Road, Tallawong, New South Wales (NSW) (the study area). The study area is defined as Lot 1 DP 1283186 approximately 46 kilometres north-east of the Sydney central business district (CBD).

This ACHA has been prepared to support a Review of Environmental Factors (REF) for the DoE for the construction and operation of the new high school for Schofields and Tallawong (the activity). The purpose of the REF is to assess the potential environmental impacts of the activity prescribed by *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) as “development permitted without consent” on land carried out by or on behalf of a public authority under Part 5 of *Environmental Planning and Assessment Act 1979* (EP&A Act). The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37 of the T&I SEPP.

This document has been prepared in accordance with the Guidelines for Division 5.1 assessments (the Guidelines) by the Department of Planning, Housing and Infrastructure. The purpose of this report is to identify Aboriginal heritage constraints that may be present within the study area.

The future development of the site will involve ground disturbing works that will have the potential to impact known and unknown Aboriginal heritage constraints that may be present within the study area.

The proposed activity is for the construction and operation of a new high school known as Schofields-Tallawong High School. The new high school will accommodate up to 1,000 students. The school will provide 49 permanent teaching spaces (PTS), and 3 support teaching spaces (STS) across three buildings.

The buildings will be three-storey in height and will include teaching spaces, specialist learning hubs, a library, administrative areas and a staff hub. Additional core facilities are also proposed including a standalone school hall, a carpark, as pick up and drop off zone along Nirmal Street, two sports courts and a sports field.

Specifically, the proposal involves the following:

- Three learning hubs (three-storeys in height) accommodating 49 general teaching spaces and 3 support learning units (SLUs).
- Other core facilities including amenities, library, staff hub and administrative areas.
- Standalone school hall.
- Separate carpark with 72 spaces.
- Kiss and drop zone along Nirmal Street.
- Open play space including sports courts and sports field.
- Public domain works.

The proposed site access arrangements are as follows:

- Main pedestrian entrance to be located off Nirmal Street.
- Kiss and drop zone proposed along Nirmal Street.
- Onsite parking access via Nirmal Street.

Consultation

The Aboriginal community was consulted regarding the heritage management of the project throughout its lifespan. Consultation has been undertaken as per the process outlined in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) (consultation requirements) (Appendix 1). The appropriate government bodies were notified, and advertisements placed in the *Daily Telegraph* (13 September 2024), which resulted in the following Aboriginal organisations registering their interest (Table 1):

Table 1 List of registered Aboriginal parties and group contact

No.	Organisation	Contact person
1	Deerubbin Local Aboriginal Land Council	-
2	A1 Indigenous Services	Carolyn Hickey
3	Confidential Party 1	-
4	Didge Ngunawal Clan	Lilly Carroll
5	Pearl Depoma	Pearl Depoma
6	Guntawang Aboriginal Corporation	Wendy Morgan
7	Mundawari Heritage Consultants	Dean Delponte
8	Dharug Custodian Aboriginal Corporation	Justine Coplin
9	Wailwan Aboriginal Group	Phillip Boney
10	Yulay Cultural Services	Arika Jalomaki
11	Kamilaroi Yankuntjatjara Working Group	Phil Khan
12	Thomas Dahlstrom	Thomas Dahlstrom
13	Ginninderra Aboriginal Corporation	Krystle Carroll Elliot
14	Butucarbin Aboriginal Corporation	Jennifer Beale
15	Julie Jones Webb	Julie Jones Webb
16	Wurrumay Culture Heritage Consultants	Kerrie and Vicky Slater
17	Murra Bidgee Mullangari Aboriginal Corporation	Darleen and Ryan Johnson
18	Muragadi Heritage Indigenous Corporation	Jesse Johnson
19	Ngambaa Cultural Connections	Kaarina Slater

A search conducted by the Office of the Registrar, *Aboriginal Land Rights Act 1983* listed no Aboriginal Owners with land within the study area. A search conducted by the National Native Title Tribunal (NNTT) listed no Registered Native Title Claims, Unregistered Claimant Applications or Registered Indigenous Land Use Agreements within the study area.

Upon registration (Appendix 2), the Aboriginal parties were invited to provide their knowledge on the study area and on the proposal provided in Methodology (Appendix 3). The response identified the study as an area of high significance. Responses from the Registered Aboriginal Parties (RAPs) are included in Appendix 3.

A site meeting was undertaken with a RAP representative with identified cultural knowledge of the study area prior to the archaeological survey. Details of this can be found in Section 4.3.2.

The outcome of the consultation process was that one RAP considered the study area to have a high level of cultural significance and is a part of a nominated Aboriginal Place *Nangamayy Ngurra*. The site was utilised as

a men's site, ceremonial grounds and a burial place for the Dharug clans. The results of the consultation process are included in this document Appendix 4.

The recommendations that resulted from the consultation process are provided below.

Results

The ACHA undertook background research for the proposed study area. Key considerations arising from the background research include:

- The study area is situated within a nominated Aboriginal Place *Nangamay Ngurra* that holds high cultural significance for the local Aboriginal community. The Aboriginal place is made up of a complex of archaeological sites and was utilised as a men's site, ceremonial grounds and burial place.
- A review of the historical aerials indicates that the study area has been subject to some disturbance due to residential development and historical vegetation clearance. Some portions of the study area have undergone moderate ground disturbance in the forms of vegetation clearance, livestock grazing and associated infrastructure.
- Two registered AHIMS sites exist within the study area, AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4 which consist of low to moderate density artefact scatters. AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4 were identified through subsurface testing undertaken by KNC in 2024.
- One previously un-recorded AHIMS site was identified during the field investigation, AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 which consists of one isolated artefact.
- There are 83 Aboriginal cultural heritage sites registered with the Aboriginal Heritage Information Management System (AHIMS) register, within a 1.25 kilometres search area centred on the study area. The search indicates that artefact sites are the dominant site type within 1.25 kilometres of the study area.

Biosis undertook a field investigation on 23 October 2023. Visible disturbance was noted in the form of access tracks, stockyards and areas of cut and fill earthworks; further disturbance could not be identified due to extensive grass cover. One previously unrecorded Aboriginal heritage site was identified within the study area (Table 2). AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 which consists of an isolated hammerstone artefact was identified upon an established dirt track. It is evident that the artefact was not found in situ.

DoE assessed three potential sites to develop the Schofields-Tallawong High School to meet current and future demand for public high-school tuition in the area. Optioneering was limited to these three sites based on the high forecasted demographic growth and the limited number of land parcels available for acquisition within the area of service need.

The two other potential school sites were investigated for development in accordance with DoE property due diligence processes. These other two site were discounted for the following reasons:

- An available land parcel located in the area was discounted as it was located near an active abattoir and in an area where precinct development of critical infrastructure (roads and services) and land rezoning requirements would not be available in time to allow the school to be developed in time to address the service need.
- An available land parcel in the area was discounted as it was too close to an existing high school (approximately 500m away from Rouse Hill High School). In addition, the land parcel was zoned for

future government housing supply initiatives and has an on-site water detention basin which would have significantly impeded construction and operation of a school on the land.

As neither of the above sites were suitable for development to meet the growing student service need in this area, the current Schofields-Tallawong site was selected for development.

DoE also confirms that based on the Aboriginal cultural heritage investigations, impacts to the archaeological site AHIMS 45-5-5766/Guntawong Road 2 have been reduced through redesign. The majority of AHIMS 45-5-5766/Guntawong Road 2 have within the high school area will now not be impacted, and will be conserved and protected from harm as an area of natural drainage overflow. As impacted to AHIMS 45-5-5766/Guntawong Road 2 have are able to avoided, a no harm area will be fenced to ensure the area is protected.

Table 2 Site details

Site name	Site type	Scientific Significance	Type of harm before mitigated	Consequence of unmitigated harm	Mitigation measures
AHIMS 45-5-5821	Guntawong Road 4	Low	Direct	Total loss of value	Avoidance of site. Heritage induction and development on an Aboriginal Cultural Heritage Management Plan (ACHMP). Where avoidance is not possible, Aboriginal Heritage Impact Permit (AHIP) to impact should be obtained.
AHIMS 45-5-5766	Guntawong Road 2	Moderate	Direct	Partial loss of value	Avoidance of site, fencing, heritage induction and development on an ACHMP. If site cannot be avoided, an AHIP to impact should be obtained.
AHIMS 45-5-5913	201 Guntawong Rd Hammerstone 1	Low	Direct	Total loss of value	Avoidance of site, heritage induction and development on an ACHMP. Where avoidance is not possible, AHIP to impact and community collection.
Nangamay Ngurra Aboriginal Place nomination	<i>Nangamay Ngurra Aboriginal Place nomination</i>	TBC	Direct	Partial loss of value	Avoidance of site, heritage induction and development on an ACHMP. Where avoidance is not possible, and if the nominated is approved by Heritage NSW an AHIP to impact should be obtained.

Management recommendations

Prior to any development impacts occurring within the study area, the following is recommended:

Recommendation 1: Continued consultation with the registered Aboriginal parties

It is recommended that DoE continue to inform these groups about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project. This recommendation is in keeping with the consultation requirements.

Recommendation 2: Application for an AHIP to impact AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1

If avoidance through redesign is unable to occur, it is recommended that that DoE apply to Heritage NSW, NSW Department of Climate change, Energy, the Environment and Water (Heritage NSW) for an AHIP to destroy AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 and to partially impact AHIMS 45-5-5766/Guntawong Road 2 which are currently protected under the NPW Act. The AHIP should be for a term of five years.

A small portion of AHIMS 45-5-5766/Guntawong Road 2 will be impacted by the proposed activity. Due to the low to moderate density of artefacts, no further works is advised. The majority of AHIMS 45-5-5766/Guntawong Road 2 will not be impacted and will be conserved (refer to Recommendation 3).

It is recommended that the surface stone artefacts associated with AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 is collected prior to construction.

Recommendation 3: Fencing of AHIMS 45-5-5766/Guntawong Road 2

Prior to any works taking place, the majority of AHIMS 45-5-5766/Guntawong Road 2 and the area of moderate archaeological potential which will not be impacted are to be conserved and should be clearly fenced to ensure they will not be harmed by the proposed activity. Fencing must remain in place over the lifespan of the construction phase.

Recommendation 4: No further archaeological work required in the area of low potential once AHIP obtained from Heritage NSW

No further archaeological work is required in the area of low potential except in the event that unexpected human remains are unearthed during any phase of the project (refer to Recommendation 7).

Recommendation 5: Discovery of unanticipated Aboriginal objects

All Aboriginal objects and Places are protected under the NPW Act. It is an offence to disturb an Aboriginal site without a consent permit issued by Heritage NSW. Should any unanticipated Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying Heritage NSW and Aboriginal stakeholders.

Recommendation 6: Discovery of unanticipated historical relics

Relics are historical archaeological resources of local or State significance and are protected in NSW under the *Heritage Act 1977*. Relics cannot be disturbed except with a permit or exception/exemption notification. Should unanticipated relics be discovered during the course of the project, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find. The Heritage Council will require notification if the find is assessed as a relic.

Recommendation 7: Discovery of human remains

If any suspected human remains are discovered during any activity you must:

1. Immediately cease all work at that location and not further move or disturb the remains.
2. Notify the NSW Police and Heritage NSW Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
3. Not recommence work at that location unless authorised in writing by Heritage NSW.

Recommendation 8: Development of an Aboriginal Cultural Heritage Management Plan

It is recommended an Aboriginal Cultural Heritage Management Plan (ACHMP) be developed to appropriately manage Aboriginal cultural heritage identified within the study area. An ACHMP sets out specific guidelines and protocols for the management of Aboriginal heritage across the life of the project inclusive of construction and operational use. This should be inclusive of unanticipated finds protocols, the requirement for heritage inductions to be undertaken by the site personnel prior to works, and long-term care and control of Aboriginal archaeological materials. The ACHMP must be prepared by a suitably qualified archaeologist in consultation with the RAPs for the project.

Recommendation 9: Heritage Interpretation plan

Given the significance of the region to Aboriginal people, there is an opportunity for heritage interpretation as part of the design. Heritage interpretation is an innovative way to integrate culture into design and can not only honour the deep-rooted connection to the land but also ensure that Aboriginal cultural heritage remains present in the daily operations of the proposed high school. As such, it is recommended that a Heritage Interpretation Plan be prepared by a suitably qualified heritage consultant following the NSW Heritage Council's *Interpreting Heritage Places and Items Guidelines*.

Biosis understands that this recommendation has been captured within the Connecting with Country program undertaken by DoE.

Definitions

ACHA	Aboriginal Cultural Heritage Assessment
ACHMP	Aboriginal Cultural Heritage Management Plan
ADDA	Aboriginal Due Diligence Assessment
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
AR	Archaeological Report
Biosis	Biosis Pty Ltd
BP	Before Present
Consultation requirements	<i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> (DECCW 2010a)
Cth DCCEEW	Australian Commonwealth Department of Climate Change, Energy, the Environment and Water
DoE	NSW Department of Education
DECCW	Department of Environment, Climate Change and Water (now Heritage NSW)
DP	Deposited Plan
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
ESD	Ecological Sustainable Development
GDA	Geocentric Datum of Australia
GPS	Global Positioning System
GSV	Ground Surface Visibility
Heritage NSW	Heritage NSW, NSW Department of Climate Change, Energy, the Environment and Water
ICOMOS	International Council on Monuments and Sites
JMCHM	Jo McDonald Cultural Heritage Management
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
LGA	Local Government Area
MGA	Map Grid of Australia
NHL	National Heritage List
NNTT	National Native Title Tribunal
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPWS	National Parks and Wildlife Service
NSW	New South Wales
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
NTSCORP	Native Title Services Corporation
PAD	Potential Archaeological Deposit

PTS	Permanent Teaching Spaces
RAPs	Registered Aboriginal Parties
REF	Review of Environmental Factors
REP	Regional Environmental Plan
SEPP	State Environmental Planning Policy
SLUs	Support Learning Units
STS	Support Teaching Spaces
The Code	<i>Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW</i>
The Guidelines	The Guidelines for Division 5.1 assessments by the Department of Planning, Housing and Infrastructure
The study area	201 Guntawong Road, Tallawong NSW (Lot 1 DP1283186)
T&I SEPP	<i>State Environmental Planning Policy (Transport and Infrastructure) 2021</i>

1 Introduction

This ACHA has been prepared to support a REF for the proposed new high school for Schofields and Tallawong. The purpose of the REF is to assess the potential environmental impacts of the activity prescribed by T&I SEPP as “development permitted without consent” on land carried out by or on behalf of a public authority under Part 5.1 of EP&A Act. The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37 of the T&I SEPP.

1.1 Project background

Biosis has been commissioned by DoE to undertake an ACHA for the proposed new high school at 102 Guntawong Road, Tallawong (Lot 1 DP 1283186), NSW (Figure 1).

This report details the investigation, consultation and assessment of Aboriginal cultural heritage undertaken for the study area. The Archaeological Report (AR) in Appendix 5 details the findings of the archaeological investigations conducted as part of the ACHA. As required under Section 2.3 of the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b) (the Code), the AR provides evidence about the material traces of Aboriginal land use to support the conclusions and management recommendations in the ACHA.

The future development of the site will involve ground disturbing works that will have the potential to impact known and unknown Aboriginal heritage constraints that may be present within the study area. The project is to be assessed as a REF under Part 5.1 of the EP&A Act.

1.2 Study area

The site is known as 201 Guntawong Road, Tallawong and is legally described as part of Lot 1 DP 1283186 (Figure 1). The site is located at the corner of Guntawong Road and Clarke Street, Tallawong and is approximately 4 hectares. The site has an approximately 100-metre-long frontage to Guntawong Road along its northern boundary. Nirmal Street provided a partial frontage along the eastern boundary of the site with plans to extend Nirmal Street to provide a future connection to Guntawong Road.

The site is predominantly cleared land and consists of grassland with several patches of remnant native vegetation particularly within the northern portion of the site. As a result of precinct wide rezonings, the surrounding located is currently transitioning from a semi-rural residential area to a highly urbanised area with new low to medium density residential development with supporting services. The site is located approximately 1.5 kilometres to the north-west of Tallawong Metro Station and is also serviced by an existing bus stop along Guntawong Road (Figure 2).

1.3 Proposed activity

The proposed activity is for the construction and operation of a new high school known as Schofields-Tallawong High School. The new high school will accommodate up to 1,000 students. The school will provide 49 PTS and 3 STS across three buildings.

The buildings will be three-storey in height and will include teaching spaces, specialist learning hubs, a library, administrative areas and a staff hub. Additional core facilities are also proposed including a standalone school hall, a carpark, as pick up and drop off zone along Nirmal Street, two sports courts and a sports field.

Specifically, the proposal involves the following:

- Three learning hubs (three-storeys in height) accommodating 49 general teaching spaces and three SLUs.
- Other core facilities including amenities, library, staff hub and administrative areas.
- Standalone school hall.
- Separate carpark with 72 spaces.
- Kiss and drop zone along Nirmal Street.
- Open play space including sports courts and sports field.
- Public domain works.

The proposed site access arrangements are as follows:

- Main pedestrian entrance to be located off Nirmal Street.
- Kiss and drop zone proposed along Nirmal Street.
- Onsite parking access via Nirmal Street.

Figure 3 provides an extract of the proposed site plan.

1.4 Planning approvals

The proposed development will be assessed against Part 5 of the EP&A Act. Other relevant legislation and planning instruments that will inform this assessment include:

- NPW Act.
- *National Parks and Wildlife Amendment Act 2010* (NSW).
- T&I SEPP
- *State Environmental Planning Policy (Industry and Employment) 2021*.
- *Environmental Planning and Assessment Regulation 2021*.
- *Blacktown Local Environmental Plan 2015*.
- *Blacktown Development Control Plan 2015*.

1.5 Restricted and confidential information

Appendix 5 in the AR contains AHIMS information which is confidential and not to be made public. This is clearly marked on the title page for the Attachment.

1.6 Aboriginal cultural heritage

1.6.1 General description

According to (Allen & O'Connell 2003), Aboriginal people have inhabited the Australian continent for the last 50,000 years. New evidence out of the Northern Territory has pushed this date back with the Malakanunja II rock shelter dated at around 65,000 years BP (before present) (Clarkson et al. 2017).

In NSW, according to Bowler et al. (2003), Aboriginal people have occupied the land for over 42,000 years. However, preliminary evidence presented by Biosis (2016) from a subsurface testing program in south-western NSW suggests Aboriginal people may have occupied the semi-arid zone of the region for 50,000 years.

Without being part of the Aboriginal culture and the productions of this culture, it is not possible for non-Aboriginal people to fully understand the meaning of site, objects and places to Aboriginal people – only to move closer towards understanding this meaning with the help of the Aboriginal community. Similarly, definitions of Aboriginal culture and cultural heritage without this involvement constitute outsider interpretations.

With this preface Aboriginal cultural heritage broadly refers to things that relate to Aboriginal culture and hold cultural meaning and significance to Aboriginal people (DECCW 2010a, p.3). There is an understanding in Aboriginal culture that everything is interconnected. In essence Aboriginal cultural heritage can be viewed as potentially encompassing any part of the physical and/or mental landscape, that is, 'Country' (DECCW 2010a, p.iii).

Aboriginal people's interpretation of cultural value is based on their 'traditions, observance, lore, customs, beliefs and history' (DECCW 2010a, p.3). The things associated with Aboriginal cultural heritage are continually and actively being defined by Aboriginal people (DECCW 2010a, p.3). These things can be associated with traditional, historical or contemporary Aboriginal culture (DECCW 2010a, p.3).

1.6.2 Tangible Aboriginal cultural heritage

Three categories of tangible Aboriginal cultural heritage may be defined:

- Things that have been observably modified by Aboriginal people.
- Things that may have been modified by Aboriginal people, but no discernible traces of that activity remain.
- Things never physically modified by Aboriginal people (but associated with Dreamtime Ancestors who shaped those things).

1.6.3 Intangible Aboriginal cultural heritage

Examples of intangible Aboriginal cultural heritage would include memories of stories and 'ways of doing', which would include language and ceremonies (DECCW 2010a, p.3).

1.6.4 Statutory

Currently Aboriginal cultural heritage, as statutorily defined by the NPW Act, consists of objects and places which are protected under Part 6 of the Act.

Aboriginal objects are defined as:

any deposit, object or material evidence...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 places are defined as a place that is or was of special Aboriginal cultural significance. Places are declared under Section 84 of the NPW Act.

1.6.5 Values

Aboriginal cultural heritage is valued by Aboriginal people as it is used to define their identity as both individuals and as part of a group (DECCW 2010a, p.iii). More specifically it is used:

- To provide a:
 - ‘*Connection and sense of belonging to Country*’ (DECCW 2010a, p.iii).
 - Link between the present and the past (DECCW 2010a, p.iii).
- As a learning tool to teach Aboriginal culture to younger Aboriginal generations and the general public (DECCW 2010a, p.3).
- As further evidence of Aboriginal occupation prior to European settlement for people who do not understand the magnitude to which Aboriginal people occupied the continent (DECCW 2010a, p. 3).

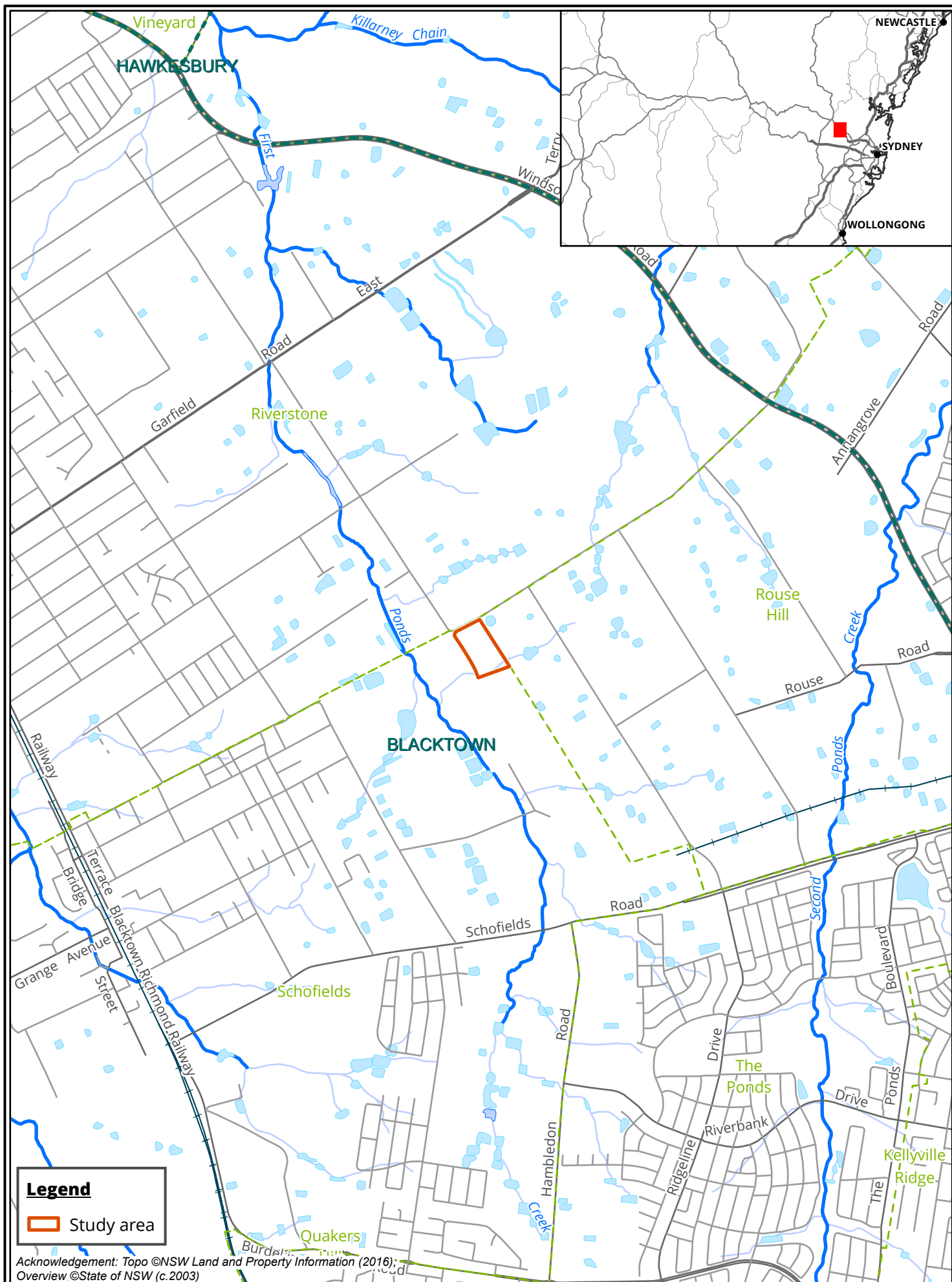
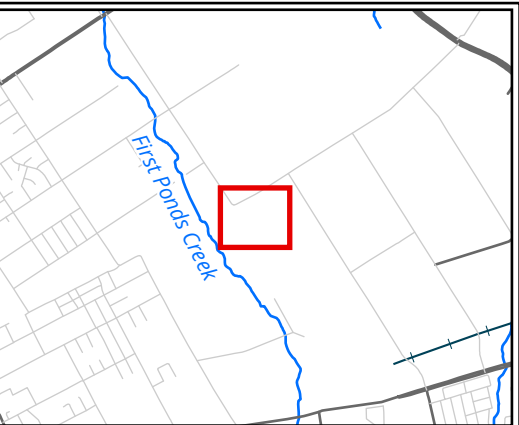


Figure 1 Location of the study area

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 Prepared for: BB, Prepared by: AA., Last edited by: aabid
 Location: P:\40100s\40105\Mapping\40105_Tallawong_ACHA
 Layout: 40105_ACHA_F1_Locality

0 200 400 600 800 1,000
 Metres
 Scale 1:25,000@A4, GDA2020 MGA Zone 56





Legend



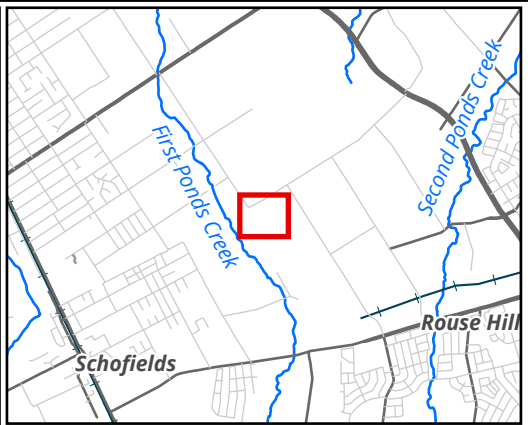
-  Study area
-  Lot

Figure 2 Study area detail

0 10 20 30 40 50
Metres
Scale: 1:1,500 @ A3
Coordinate System: GDA2020 MGA Zone 56



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Layout: 40105_ACHA_F2_StudyArea



Legend
Study area

Figure 3 Proposed activity

0 10 20 30 40 50
Metres
Scale: 1:1,500 @ A3
Coordinate System: GDA2020 MGA Zone 56



Matter: 40105, Date: 18 December 2024,
Prepared for: BB, Prepared by: AA., Last edited by: aabid
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Layout: 40105_ACHA_F3_ProposedActivity

2 Study area context

This section discusses the study area in regard to its landscape, environmental and Aboriginal cultural heritage context. This section should be read in conjunction with the AR attached in Appendix 5. The background research has been undertaken in accordance with the Code.

2.1 Landscape context

It is important to consider the local environment of the study area in any heritage assessment. The local environmental characteristics can influence human occupation and associated land use and consequently the distribution and character of cultural material. Environmental characteristics and geomorphological processes can affect the preservation of cultural heritage materials to varying degrees or even destroy them completely. Lastly landscape features can contribute to the cultural significance that places can have for people.

2.2 Geology, topography and hydrology

The study area is located within the Cumberland Plain, which is a broad and shallow basin that stretches westwards from Parramatta to the Hawkesbury-Nepean River and southwards from Windsor to Thirlmere (S. M. Bannerman & Hazelton 1990). The study area is contained within the Wianamatta Group geological formation, specifically Bringelly Shale geological unit. The Bringelly Shale formation is primarily composed of shale, with occasional calcareous claystone, laminate, and coal (S. M. Bannerman & Hazelton 1990, p.28). Topographically the study area is situated within a ridge landform, surrounded by gently sloping landscapes.

Stream order is recognised as a factor which assists in the development of predictive modelling in Sydney Basin Aboriginal archaeology, and has seen extensive use in the Sydney region, most notably by Jo McDonald Cultural Heritage Management (JMCHM) (Jo McDonald Cultural Heritage Management 2000, Jo McDonald Cultural Heritage Management 2005, JMCHM 2005, Jo McDonald Cultural Heritage Management 2006, Jo McDonald Cultural Heritage Management 2008). Predictive models, which have been developed for the region, have a tendency to favour higher order streams as having a higher potential for campsites as these types of streams would have been more likely to provide a stable source of water and by extension, other resources which would have been used by Aboriginal groups.

A first order non perennial water source is located in the southern portion of the study area which flows easterly. This water course is a tributary of First Ponds Creek, a third order perennial water course located 240 metres to the west of the study area. Another first order non perennial water course is located 275 metres north of the study area, which also flows easterly from First Ponds Creek.

2.3 Soil landscapes

Soil landscapes have distinct morphological and topological characteristics that result in specific archaeological potential. They are defined by a combination of soils, topography, vegetation and weathering conditions. Soil landscapes are essentially terrain units that provide a useful way to summarise archaeological potential and exposure.

The study area is contained within the Blacktown soil landscape. The Blacktown soil landscape is a residual soil landscape and consists of gently undulating rises, broad rounded crests and gently inclined slopes with a

gradient of less than 5%. Local relief within the Blacktown soil landscape is up to 30 metres and rocky outcropping is absent. Dominant soils consist of shallow to moderately deep (<100 centimetres) red and brown podzols on crests and in well drained topographies, and deep (150-300 centimetres) yellow podzolic soils and soloths on lower slopes and drainage lines (S.M. Bannerman & Hazelton 1990, p.28). Residual soils form from the in-situ weathering of bedrock material, resulting in slow accumulation of soils over long periods of time. Due to their age and slow accumulation, residual soil landscapes have reasonable potential to preserve archaeological deposits in an open context, such as stone artefacts derived from occupation sites.

2.4 Climate and rainfall

Climate data was provided by the Seven Hills (Collin Street) NSW weather station approximately 14 kilometres south of the study area, Station No. 067026 (Bureau of Meteorology 2024).

- The mean maximum average temperature is highest in December when it reaches 28.4 degrees.
- The lowest mean maximum temperature is in July at 17.4 degrees.
- The mean minimum temperature is highest in January at 17.1 degrees and lowest in July at 4.5 degrees.
- The average rainfall is highest in February at 117.9 millimetres and lowest in July at 46.7 millimetres.

Rainfall would have supported a number of plant and animal resources within the area, while lower temperatures during winter months may have limited activity in the area during colder periods. While there have been dramatic climate variations over the past 65,000 years, the recent climate data suggests overall the area was temperate, indicating resources were likely available year-round/seasonally.

2.5 Landscape resources

The original woodland and open-forest supported by the Blacktown soil landscape were dominated by Forest Red Gum *Eucalyptus tereticornis*, Narrow-leaved Iron Bark *E. crebra*, Grey Box *E. moluccana* and Spotted Gum *E. rnaculala* with Woollybutt *r. longifolia* as understorey (S. M. Bannerman & Hazelton 1990, p.29). A Pre-Development Tree Assessment prepared by Arborsaw (2024) confirmed the study area is within the Cumberland Plain Woodland, and identified the following native tree species: *Eucalyptus tereticornis* Forest Red Gum; *E. moluccana* Grey Box; *E. crebra* Narrow Leaf Iron Bark; *Angophora floribunda* Rough-barked Apple; and *Casuarina glauca* Swamp SheOak.

Plant resources were used in a variety of ways. Fibres were twisted into string which was used for many purposes including the weaving of nets, baskets and fishing lines. String was also used for personal adornment. Bark from eucalypts was used in the provision of shelter; a large sheet of bark being propped against a stick to form a gunyah (Attenbrow 2002). Swamp oak bark could be used for the making of canoes, and smooth-barked apple for the making of baskets and bowls.

Common fauna within the area include Common Ringtail Possum *Pseudocheirus peregrinus*, Common Brushtail Possum *Trichosurus vulpecula*, Gould's Wattled Bat *Chalinolobus gouldii*, Southern Myotis *Myotis Macropus*, Australian Raven *Corvus coronoides*, Noisy Miner *Manorina (Myzantha) melanocephala*, Magpie-lark *Grallina cyanoleuca*, and Australian Magpie *Gymnorhina tibicen* (Atlas of Living Australia 2021).

As well as being important food sources, animal products were also used for tool making and fashioning a myriad of utilitarian and ceremonial items. For example, tail sinews are known to have been used to make fastening cord, while 'bone points', which would have functioned as awls or piercers, are often part of the archaeological record. Animals such as Brushtailed Possums were highly prized for their fur, with possum skin cloaks worn fastened over one shoulder and under the other (Attenbrow 2002).

Raw material sources in the vicinity of the study area include silcrete quarries at Riverstone and Plumpton Ridge, which are located approximately 5 kilometres to the west (Archaeological & Heritage Management Solutions 2015, p.18).

While the diverse natural environment would have provided vast and plentiful floral and faunal resources and the temperate climate would have made the area suitable for year-round occupation, the distance of the study area from permanent water sources would have detracted from its appeal as a long-term occupation site.

2.6 European land use history

The land within the study area was originally granted Richard Rouse, a public servant and settler of 450 acres on 8 October 1816. Prior to modern use, the study area was utilised for grazing and agricultural purposes.

Historical aerial imagery allows for modern developments and land use to be identified within the study area. An in-depth discussion of European land use history can be found in the AR in Appendix 5. In summary, from 1947 until 1965, the study area and the vicinity of the study area was relatively undisturbed with the exception of minor vegetation clearance. By 1965, a residential structure can be observed within the western portion of the study area with an associated driveway which leads south. Minimal changes have occurred within the study area, with a new driveway observed in 1986 which leads east. From 1986 until 2005, no changes have occurred within the study area. Currently, no residential structures are within the study area and it is vacant.

3 Aboriginal cultural heritage context

3.1 Ethnohistory

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

Despite a proliferation of Aboriginal heritage sites there is considerable ongoing debate about the nature, territory and range of pre-contact Aboriginal language groups in the greater Sydney region. These debates have arisen largely because, by the time colonial diarists, missionaries and proto-anthropologists began making detailed records of Aboriginal people in the late 19th century, pre-European Aboriginal groups had been broken up and reconfigured by European settlement activity. The following information relating to Aboriginal people on the Cumberland Plains is based on such early records.

There is some confusion relating to group names, which can be explained by the use of differing terminologies in early historical references. Language groups were not the main political or social units in Aboriginal life. Instead, land custodianship and ownership centred on the smaller named groups that comprised the broader language grouping. There is some variation in the terminology used to categorise these smaller groups; the terms used by (Attenbrow 2002) will be used here.

Early interactions between local Aboriginal groups in the Sydney region and European colonists varied in nature between peaceful and hostile. It was not long before the effects of colonisation proved detrimental to local groups, with farming practices employed by the colonists removing land that had until that point been used for subsistence (Attenbrow 2002).

Early observers made no note of the language of the local groups, and it was not until the latter part of the 19th century that the name Darug was used. Matthews (1901, p. 155 in Attenbrow 2002, p.32) stated that "The Dharuk speaking people adjoined the Thurralwal on the north, extending along the coast to the Hawkesbury River, and inland to what are now Windsor, Penrith, Campbelltown, and intervening towns". Subsistence activities varied based on the local landscapes, with Darug groups closer to the coast employing different food sources and means of hunting in order to survive, compared to those further inland (Kelleher Nightingale Consulting 2010, p.10).

Attenbrow suggests that a total of four dialects were spoken in the Sydney region (Attenbrow 2002, p.34):

- Darug coastal dialect/s - the Sydney Peninsula (north of Botany Bay, south of Port Jackson, west to Parramatta), as well as the country to the north of Port Jackson, possibly as far as Broken Bay.
- Darug hinterland dialect - on the Cumberland Plain from Appin in the south to the Hawkesbury River in the north; west of the Georges River, Parramatta, the Lane Cove River and Berowra Creek.
- Dharawal - from south side of Botany Bay, extending south as far as the Shoalhaven River; from the coast to the Georges River and Appin, and possibly as far west as Camden.
- Gundungurra - southern rim of the Cumberland Plain west of the Georges River, as well as the southern Blue Mountains.

Work has been undertaken by a number of authors, including ethnographic information about local Aboriginal groups. This has included attempts to record what remains of the Darug language. A selection of place names for the western Sydney region recorded by Reverend W B Clarke are shown in Table 3.

Table 3 Darug place names (The Hills Shire Council 2014, p.20)

Darug language	Current geographic area
Wianamatta	South Creek
Borramaree	Between Toongabbie and Baulkhan Hills
Noree	Baulkham Hills
Mogoaillee	Castle Hill
Narrung Dooral	Kenthurst?
Cobbory Dooral	Towards Wiseman's; where much honey: good honey place
Budgoggerah	Near Tollgate
Burailee	Near Berowra
Wiamarra	Prospect

3.2 Aboriginal heritage located in the study area

A search of the AHIMS database (26 September 2024, Client Service ID: 934369) identified 83 Aboriginal archaeological sites within a 1.25 x 1.25 kilometre search area, centred on the study area.

The archaeological assessment identified the following Aboriginal sites in the study area:

- AHIMS 45-5-5766/Guntawong Road 2.
- AHIMS 45-5-5821/Guntawong Road 4.
- AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1.
- *Nangamay Ngurra* Aboriginal Place nomination

The AR attached in Appendix 5 provides details for Aboriginal sites identified during the archaeological assessment and provides a summary of the prior studies completed by Kelleher Nightingale Consulting (KNC). A brief description of each site is provided below and site locations are shown on Figure 4.

AHIMS 45-5-5766/Guntawong Road 2

AHIMS 45-5-5766/Guntawong Road 2 is a low to moderate density subsurface artefact scatter which was recorded by KNC in 2024. The site is located across the lower slope of a spur running west from the ridgeline between Second Ponds and First Ponds Creek. A total of 15 artefacts were recovered from 1.5 square metres, which is a mean artefact density of 10 per square metre. The artefact assemblage consists of flake and flake fragments made of silcrete and IMT with two cores and one back blade fragment.



Photo 1 Silcrete artefacts from AHIMS 45-5-5766/Guntawong Road 2

AHIMS 45-5-5821/Guntawong Road 4

AHIMS 45-5-5821/Guntawong Road 4 is a low-density subsurface artefact scatter which was previously recorded by KNC in 2024. The site consists of two silcrete flakes and is located within the mid slope of a spurline running along Guntawong Road. The site is approximately 190 metres each of the first order drainage tributary and 350 metres east of First Ponds Creek.

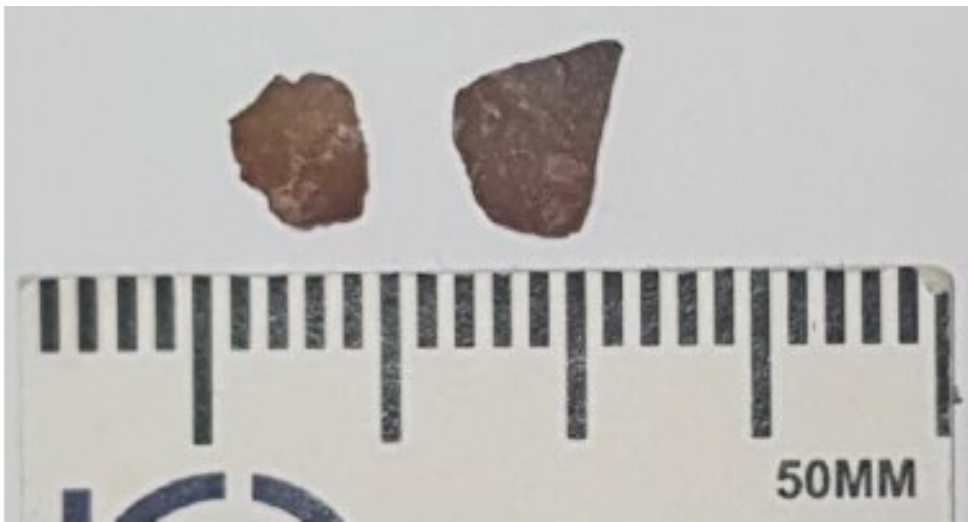


Photo 2 Silcrete flakes from AHMS 45-5-5821/Guntawong Road 4

AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1

AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 was identified during a field investigation by Biosis. The site consists of an isolated artefact located on the surface of an access track within the southern portion of the study area. The artefact consisted of a quartzite river cobble fragment with battering damage on the intact distal end consistent with use as a hammerstone. The artefact displayed some damage from vehicle

use of an access track. The artefact was not in-situ and has been deposited in its location by non-cultural actions.



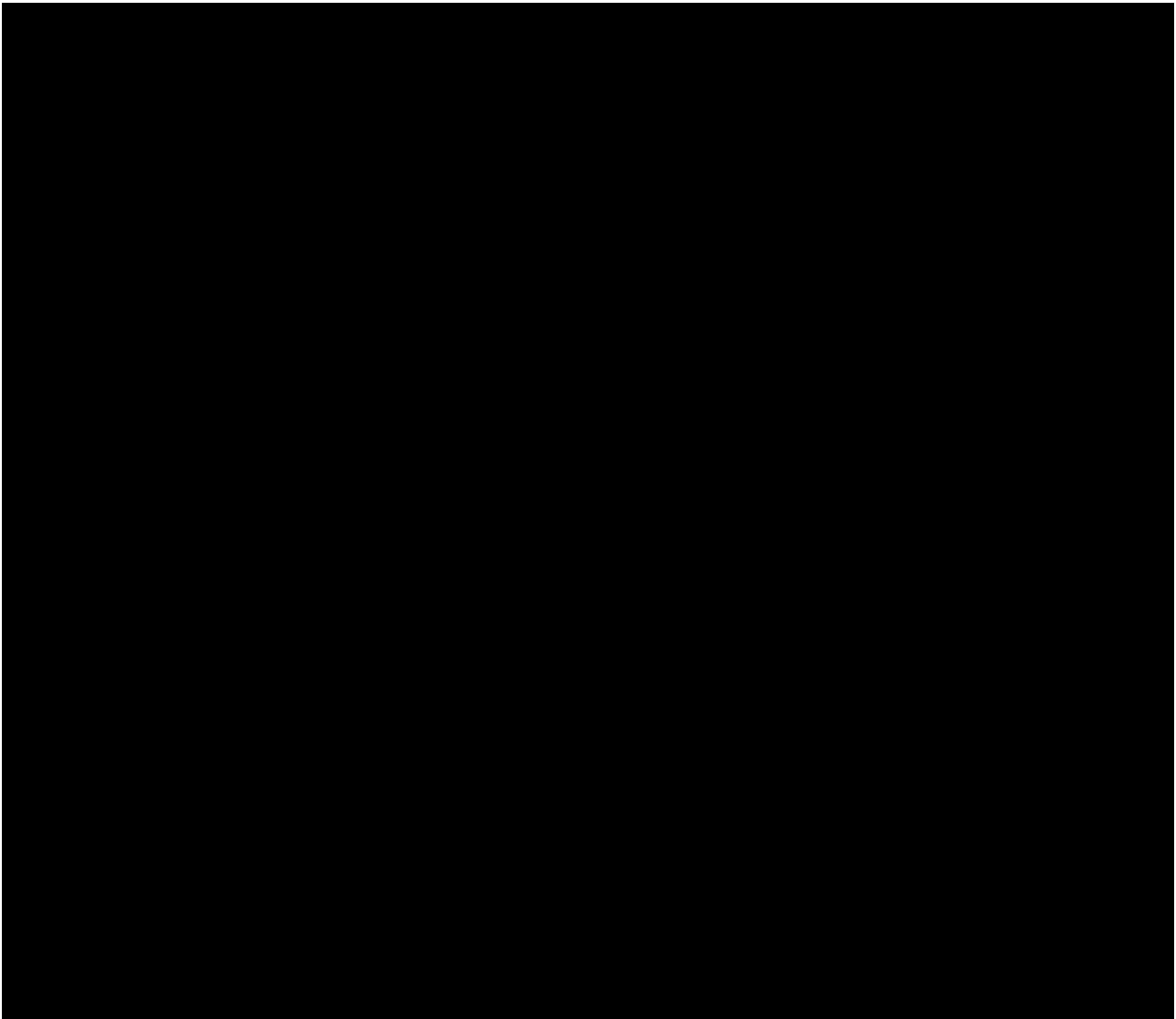
Photo 3 AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1



Photo 4 AHIMS 450505913/201 Guntawong Rd Hammerstone 1, photo portraying the distal end with battering damage

Nangamay Ngurra Aboriginal Place nomination The study area is part of a wider Aboriginal site known as Nangamay Ngurra. The Aboriginal place consists of the following lots:

- Lot 9 Section Q DP712
- Lot 1-3, 22-26 DP 1447
- Lot 33 DP 39341
- Lot 4, 5, 43, 44, 46, 47 DP 1239068
- Lot 20-21 DP 1246798
- Lots 4 (part), 5, 6 (part), 8 DP 1252397
- Lot 1 DP 1283186
- Cranbourne Street (part)
- Keogh Street (part)
- Orticelli Street (part)
- Skinner Street (part)



Nangamay Ngurra includes a ceremonial and men's site, and a burial place. *Nangamay Ngurra* has high cultural significance, the area would have been utilised by all clans of Dharug whom would travel to meet within this area. *Nangamay Ngurra* includes a complex of archaeological sites which provide tangible evidence of the Dharug occupation within the study area and vicinity. The known archaeological sites within the *Nangamay Ngurra* Aboriginal Place nomination include:

- AHIMS 45-5-4311/A7 Archaeological Complex. This includes sites A6, A8, RV27 AND RV26. The sites include surface scatters, isolated finds, sub-surface archaeological deposits and potential culturally modified trees within the vicinity of the study area.
- AHIMS 45-5-4955/First Ponds 1

- AHIMS 45-5-5418/Guntawong IF1
- AHIMS 45-5-5419/Guntawong AS2
- AHIMS 45-5-5420/Clarke Guntawong AS1
- AHIMS 45-5-5421/Clarke AS1
- AHIMS 45-5-5422/Clarke AS2
- AHIMS 45-5-5425/Guntawong AS1
- AHIMS 45-5-5765/Guntawong Road 1
- AHIMS 45-5-5766/Guntawong Road 2
- AHIMS 45-5-5821/Guntawong Road 4
- AHIMS 45-5-5018/CS-AD-01

Archaeological sites associated with the nominated Aboriginal Place which overlap with the proposed activity area are AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4.

3.3 Interpretation of past Aboriginal land use

Due to the wider landscape, the study area contains part of the *Nangamay Ngurra* Aboriginal Place nomination a place that consists of a complex of archaeological sites and has been proposed to have tangible and intangible cultural values. Through consultation with a RAP representative with identified cultural knowledge of the area, it is understood that within proximity to, but outside the boundary of the study area is a men's site, ceremonial grounds and a burial place where the Dharug clans would have travelled to meet.

The study area is located with a flat and slope landform underlain by Bringelly Shale geological formation. The deep residual soil of the Blacktown soil landscape covers the extent of the study area. A first order non perennial water source is located in the southern portion of the study area which flows easterly. This water course is a tributary of First Ponds Creek, a third order perennial water course located 240 metres to the west of the study area. These landforms and proximity to water sources would have provided an abundance of natural food and material resources which would have been utilised by Aboriginal people within the local region. A review of historical aerial photographs show that the study area has remained relatively undeveloped until the late 1950's. Since then, the study area has been utilised as a residential dwelling and has been impacted by the development of a house, and dirt tracks leading from the residential dwelling to Guntawong and Clarke Road.

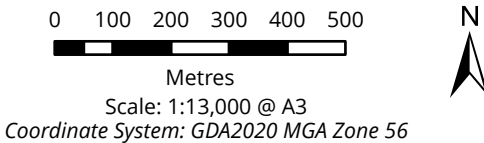
A program of test excavations was undertaken by KNC in 2024 to identify whether subsurface archaeological deposits have the potential to occur within an area of moderate potential. Two AHIMS sites were identified within the study area as a result of the excavations, AHIMS 45-5-5766/Guntawong Road 2 which consists of a low to moderate density scatter of 15 artefacts which consist of a flakes, flake fragments and a core and AHIMS 45-5-5821/Guntawong Road 4 which consist of a low density artefact scatter of two silcrete flakes.

Due to the intangible knowledge of the study area, and the tangible evidence identified through test excavations and field investigations, the study area was utilised by Aboriginal people prior to European development. Due to the close proximity to high order water sources, and by extension food resources, this would suggest that the study area would have provided natural resources which may have been utilised by Aboriginal people in the local region. The study area and local region would have been likely to provide a stable source of water and by extension other resources which would have been used by Aboriginal groups. Overall, the study area has undergone low to moderate levels of disturbance and holds low to moderate

archaeological potential. However, the study area would have provided natural resources which may have been utilised by Aboriginal people in the past, and therefore the study area holds high cultural value.

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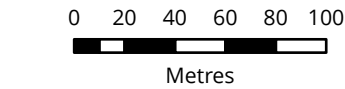
**Figure 4.1 This figure has
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exhibition**



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Layout: 40105_ACHA_F4_AHIMS

NOT TO BE MADE PUBLIC

Figure 4.2 This figure has been removed for public exhibition



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4 Aboriginal community consultation

Consultation with the Aboriginal community has been undertaken in compliance with the consultation requirements as detailed below. A consultation log of all communications with RAPs is provided in Appendix 1.

4.1 Stage 1: Notification of project proposal and registration of interest

4.1.1 Identification of relevant Aboriginal stakeholders

In accordance with the consultation guidelines, Biosis notified the following bodies regarding the proposal:

- Blacktown City Council
- Heritage NSW.
- NSW Native Title Services Corporation Limited (NTSCORP Limited).
- Office of the Registrar, *Aboriginal Land Rights Act 1983* of Aboriginal Owners.
- NNTT.
- Greater Sydney Local Land Services.
- Deerubbin LALC

A list of known Aboriginal stakeholders in the Blacktown region was provided by Heritage NSW (a copy of this is provided in Appendix 2 and include:

- | | |
|---|--|
| • Amanda Hickey Cultural Services | • Murrumbul (Murrin Clan/Peoples) |
| • Anthony Williams | • Ngambaa Cultural Connections |
| • Aragung Aboriginal Cultural Heritage Site Assessments | • Nundagurri (Murrin Clan/Peoples) |
| • B.H. Heritage Consultants | • Paul Gale Pemulwuy (Murrin Clan/Peoples) |
| • Badu (Murrin Clan/Peoples) | • Thauaira |
| • Barking Owl Aboriginal Corporation | • Thawun Aboriginal Consultancy |
| • Bidjawang Aboriginal Corporation | • Thomas Dahlstrom |
| • Billinga (Murrin Clan/Peoples) | • Thoorga Nura |
| • Black Duck Aboriginal Corporation | • Waawaar Awaa Aboriginal Corporation |
| • Butucarbin Aboriginal Corporation | • Wailwan Aboriginal Group |
| • Clive Freeman | • Walbunja (Murrin Clan/Peoples) |
| • Corroboree Aboriginal Corporation | • Walgalu (Murrin Clan/Peoples) |
| • Cullendulla (Murrin Clan/Peoples) | • Wingikara (Murrin Clan/Peoples) |
| | • Woka Aboriginal Corporation |
| | • Wori Woilywa |

- Darug Boorooberongal Elders Aboriginal Corporation
- Dharug Custodian Aboriginal Corporation
- Deerubbin Local Aboriginal Land Council
- Dharug (Murrin Clan/Peoples)
- Didge Ngunawal Clan
- DJMD Consultancy
- Gilay Consultants
- Ginninderra Aboriginal Corporation
- Goobah Development PTY LTD (Murrin Clan/Peoples)
- Goodradigbee Cultural & Heritage Aboriginal Corporation
- Gulaga
- Gunjeewong Cultural Heritage Aboriginal Corporation
- Guntawang Aboriginal Resources Incorporated
- Gunyuu (Murrin Clan/Peoples)
- HSB Consultants; HSB Heritage Consultants
- Jerringong (Murrin Clan/Peoples)
- Julia Narayan
- Kamilaroi Yankuntjatjara Working Group
- Konanggo Aboriginal Cultural Heritage Services
- Koori Digs Services
- Minnamunnung
- Mundawari Heritage Consultants
- Munyunga (Murrin Clan/Peoples)
- Mura Indigenous Corporation (icn:8991)
- Muragadi Heritage Indigenous Corporation
- Murramarang (Murrin Clan/Peoples)
- Wullung (Murrin Clan/Peoples)
- Wurrumay Culture Heritage Consultants
- Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation
- Yulay Cultural Services
- Yurrandaali
- Yurwang Gundana Consultancy Cultural Heritage Services
- Bariyan Cultural Connections
- Wallanbah Aboriginal Site Conveyancing
- RAW Cultural Healing
- Dharramalin
- Gali Heritage Consultants
- Long Gully Cultural Services
- Guthers Aboriginal Corporation
- Gadu chts
- Bill Trewlynn
- Pearl Depoma
- Nattai Aboriginal Culture & Heritage Consultation Service
- Mura Gadi Aboriginal Corporation
- Debbie Moon
- Darug Aboriginal Resource Centre
- Wallangang Aboriginal Corporation
- Ross Tangye
- Paul Webb
- Leanne Watson
- Julie Jones Webb
- Erin Wilkens
- Elizabeth Coplin
- Tylah Blunden
- Jacinta Tobin

A search conducted by the Office of the Registrar, *Aboriginal Land Rights Act 1983* (NSW) listed no Aboriginal Owners with land within the study area. A search conducted by the NNTT listed no Registered Native Title Claims, Unregistered Claimant Applications or Registered Indigenous Land Use Agreements within the study area.

4.1.2 Public notice

In accordance with the consultation guidelines, a public notification was placed in the following newspaper:

- The Daily Telegraph (13 September 2024)

The advertisement invited Aboriginal people who hold cultural knowledge to register their interest in a process of community consultation to provide assistance in determining the significance of Aboriginal object(s) and/or places in the vicinity of the study area. A copy of the public notice is provided in Appendix 2.

4.1.3 Registration of Aboriginal parties

Aboriginal groups identified in Section 4.1.1 were sent a letter inviting them to register their interest in a process of community consultation to provide assistance in determining the significance of Aboriginal object(s) and/or places in the vicinity of the study area. In response to the letters and public notice, a total of 19 groups registered their interest in the project. Responses to registration from Aboriginal parties are provided in Appendix 2 A full list of Aboriginal parties who registered for consultation is provided below:

Table 4 List of registered Aboriginal parties

No.	Organisation	Contact person
1	Deerubbin Local Aboriginal Land Council	-
2	A1 Indigenous Services	Carolyn Hickey
3	Confidential Party 1	-
4	Didge Ngunawal Clan	Lilly Carroll
5	Pearl Depoma	Pearl Depoma
6	Guntawang Aboriginal Corporation	Wendy Morgan
7	Mundawari Heritage Consultants	Dean Delponte
8	Dharug Custodian Aboriginal Corporation	Justine Coplin
9	Wailwan Aboriginal Group	Phillip Boney
10	Yulay Cultural Services	Arika Jalomaki
11	Kamilaroi Yankuntjatjara Working Group	Phil Khan
12	Thomas Dahlstrom	Thomas Dahlstrom
13	Ginninderra Aboriginal Corporation	Krystle Carroll Elliot
14	Butucarbin Aboriginal Corporation	Jennifer Beale
15	Julie Jones Webb	Julie Jones Webb
16	Wurrumay Culture Heritage Consultants	Kerrie and Vicky Slater
17	Murra Bidgee Mullangari Aboriginal Corporation	Darleen and Ryan Johnson
18	Muragadi Heritage Indigenous Corporation	Jesse Johnson

No.	Organisation	Contact person
19	Ngambaa Cultural Connections	Kaarina Slater

4.2 Stage 2: Presentation of information about the proposed project

On 31 October 2024 Biosis provided RAPs with details about the proposed activity (project information pack). On 21 November 2024, Biosis provided RAPS with a one week reminder prior to the closure of the 28 day review period. A copy of the project information pack is provided in Appendix 3.

4.3 Stage 3: Gathering information about cultural significance

4.3.1 Archaeological assessment methodology information pack

On 31 October 2024, Biosis provided each RAP with a copy of the project methodology pack outlining the proposed ACHA process and methodology for this project. RAPs were given 28 days to review and prepare feedback on the proposed methodology. On 21 November 2024, Biosis provided RAPS with a one week reminder prior to the closure of the 28 day review period. A copy of the project methodology pack is provided in Appendix 3.

A total of four responses were received for the project, three of which were in support for the project information and the methodology. One response received did not support the project.

Guntawang provided a response on 1 November 2024 via email:

"Guntawang agrees to the responsibilities and roles that we will participate in for this project. We support the consultation strategy and consultation with Aboriginal communities. We also support Appendix 1 Additional consultation Protocols".

Murrabidgee Mullangari provided a response on 6 November 2024 via email:

"I have read the project information and ACHA methodology for the above project, I endorse the recommendations made".

Didge Ngunawal Clan provided a response on 21 November 2024 via email:

"We are happy with what you've provided and would like to be including the Fieldwork thank you so much, Paul".

Dharug Custodian Aboriginal Corporation provided a response on 27 November 2024 via email:

"Thank you for providing the project information and proposed methodology for the Schofields-Tallawong High School ACHA. The proposed development is within Nangamay Ngurra and will cause significant direct and indirect harm to Dharug heritage. This harm cannot be minimised or mitigated.

We object to the development, and recommend that the ACHA process be put on hold while an alternative location is found for the development. This is the only option to avoid harm to Nangamay Ngurra. It is disrespectful and irresponsible of School Infrastructure NSW to propose construction in this landscape.

The location and significance of the A7 Archaeological Complex has been known since 2008. Since then, cumulative impact to the complex has been facilitated by a focus on archaeological significance and on discrete archaeological sites and developments, and a neglect of the overall Dharug landscape. This approach is evident in the proposed assessment methodology.

If the proponent chooses to proceed with the ACHA, we require an amended assessment methodology, including additional and detailed information about how the impact on Nangamay Ngurra will be investigated, assessed and avoided”.

Biosis responded to Dharug Custodian Aboriginal Corporation on 11 December via email:

“Thank you for providing a response on the Stage 2 and 3 consultation document for the Schofields-Tallawong High School.

Your response will be included within the ACHA and will inform the recommendations.

School Infrastructure NSW have advised the following in regards to the site selection for the proposed Schofields-Tallawong High School:

School Infrastructure assessed three potential sites to develop the Schofields-Tallawong High School to meet current and future demand for public high-school tuition in the area. Optioneering was limited to these three sites based on the high forecasted demographic growth and the limited number of land parcels available for acquisition within the area of service need.

The two other potential school sites were investigated for development in accordance with School Infrastructure property due diligence processes. These other two site were discounted for the following reasons:

- An available land parcel located in the area was discounted as it was located near an active abattoir and in an area where precinct development of critical infrastructure (roads and services) and land rezoning requirements would not be available in time to allow the school to be developed in time to address the service need.*
- An available land parcel in the area was discounted as it was too close to an existing high school (approximately 500m away from Rouse Hill High School). In addition, the land parcel was zoned for future government housing supply initiatives and has an on-site water detention basin which would have significantly impeded construction and operation of a school on the land.*

As neither of the above sites were suitable for development to meet the growing student service need in this area, the current Schofields-Tallawong site was selected for development. School Infrastructure also confirms that based on the Aboriginal cultural heritage investigations, impacts to the Guntawong Road 2 archaeological site (AHIMS# 45-5-5766) have been reduced through redesign. The majority of the Guntawong Road 2 site within the high school area will now not be impacted, and will be conserved and protected from harm as an area of natural drainage overflow.”

Dharug Custodian Aboriginal Corporation provided an additional response on 13 December 2024 via email:

“Thank you for your email. The response does not address the issues that I have raised. It suggests that neither Schools Infrastructure NSW nor Biosis has any understanding of the harm that will result from the proposed development, or any intention to properly assess or address this harm.

The Dharug landscape Nangamay Ngurra includes a massacre site, and is not appropriate as a location for a school. The significance of the A7 Archaeological Complex has been known since 2008 and should have been considered by Schools Infrastructure NSW in their selection of a site. Their selection of the site should now be reconsidered, as the only way to avoid harm to this significant Place.

The proposed methodology is not adequate to assess the harm to Nangamay Ngurra that will result from the development. The suggestion that this harm can be addressed by reducing the impact to AHIMS #45-5-5766, one small component of the Place, is inadequate. It continues the focus on the archaeological elements of the Place that has allowed ongoing cumulative impact to the landscape, and a neglect of its broader significance as Dharug heritage.

Please provide a response that addresses these issues directly.

The proposed methodology is not adequate to address the Aboriginal heritage impact of the development.

We object to the development, and recommend that the ACHA process be put on hold while an alternative location is found for the development. This is the only option to avoid harm to Nangamay Ngurra. It is disrespectful and irresponsible of School Infrastructure NSW to propose construction in this landscape.

The location and significance of the A7 Archaeological Complex has been known since 2008. Since then, cumulative impact to the complex has been facilitated by a focus on archaeological significance and on discrete archaeological sites and developments, and a neglect of the overall Dharug landscape. This approach is evident in the proposed assessment methodology.

If the proponent chooses to proceed with the ACHA, we require an amended assessment methodology, including additional and detailed information about how the impact on Nangamay Ngurra will be investigated, assessed and avoided."

Biosis responded to Dharug Custodian Aboriginal Corporation on 18 December via email:

"Thank you for your email. We have reached out to School Infrastructure NSW and asked them to provide a response.

Their response is as follows:

School Infrastructure understands that the nomination of the Aboriginal Place Nangamay Ngurra is currently being assessed by Heritage NSW. The Aboriginal place determination process is managed by Heritage NSW and runs separately to the work currently being prepared by School Infrastructure.

School Infrastructure has never proposed to impact the A7 Archaeological Complex which is located outside of the school development site. School Infrastructure has also endeavoured to reduce the degree of harm to registered sites located within the school footprint as much as possible, including preserving the majority of the AHIMS #45-5-5766 site which is in that footprint."

4.3.2 Information gathered during fieldwork

Justine Coplin from Dharug Custodian Aboriginal Corporation was invited to attend the field investigation which was undertaken on 23 October 2024.

During the field investigation, Justine indicated that there was a massacre site and campsite location on the hill to the south of the first order drainage line, both outside of the study area. She stated that this information was originally conveyed to her by a local resident named Tony, who had lived in the area many years ago. However, Justine could not provide further details about him. When asked about the availability of additional information on the massacre site and campsite, Justine indicated that further records or ethnohistorical documentation about the Aboriginal massacre site were unlikely to exist.

Justine also noted that the areas of First Ponds Creek was highly significant due to the number of artefacts present as well as there being a burial tree and axe head that had previously been found near First Ponds Creek. The area around First Ponds Creek also retains environmental significance, turtles present in the pond represented a significant resource to Aboriginal people.

When asked for any additional knowledge holders relating to the study area, Justine provided names of six knowledge holders. Of the six people mentioned, Biosis had contacted three during Stage 1.2 of community consultation and no response was received. Biosis does not have contact details for the remaining three knowledge holders.

Her recommendations for the project were that it should not go ahead at the current location and an alternate location should be explored. She asked for clarification on why this specific site was selected despite the previously known cultural values in the area. Her view was that the site has significant cultural values and the massacre of Aboriginal people in the area has resulted in harm to Aboriginal people past and present and

means the study area is not a suitable place for a school. She stated that similar development would not be allowed to occur on European burial sites and should not occur on Aboriginal ones either.

Additional consultation was undertaken with Justine Coplin from Dharug Custodian Aboriginal Corporation which can be seen in Appendix 3.

4.4 Stage 4: Review of draft ACHA report

On 20 December 2024, Biosis provided each RAP with a copy of the draft ACHA report. RAPs were given 28 days to review and prepare feedback on the report.

Dharug Custodian Aboriginal Corporation provided a response on 13 January 2025 via email:

Warami, I visited Nangamay Ngurra last week and noticed that a fence is being built around the proposed high school location at 201 Guntawong Road, Tallawong. From what I could see, construction has involved clearing vegetation and installation of fenceposts. The property boundary passes through AHIMS 45-5-5766, and I assume there has been some harm to this site. I understand the ACHAR is still in draft, and that there is no AHIP in place for the project. Could you please let me know how this impact is being managed?

Biosis responded to Dharug Custodian Aboriginal Corporation on 29 January 2025 via email:

Good morning Justine, thank you for your email. We passed your queries onto School Infrastructure, and their response is as follows:

Comment no.1 – ongoing consultation with DCAC in relation to the ACHAR preparation

School Infrastructure understands that the study area is within the boundaries of the nominated Aboriginal Place Nangamay Ngurra and that Dharug Custodian Aboriginal Corporation provided their information on the cultural landscape to Biosis during their site walk on 23 October 2024. This information has been provided in the ACHAR in section 4.3.2. This assessment has been prepared in full accordance with relevant guidelines, including the Guide to investigation, assessing and reporting on Aboriginal cultural heritage in NSW.

School Infrastructure previously shared information with Dharug Custodian Aboriginal Corporation on 11 December 2024 with detail about alternate school sites and why they were unfortunately unfeasible for the current development.

Comment no.2 – query related to DCAC viewing fencing installation at the Guntawong Road Site:

School infrastructure installed fencing around the boundary of the proposed development site in order to prevent unauthorised access. This was necessary to halt the ongoing g illegal dumping that has been occurring within the land parcel.

Fencing works were informed by the archaeological assessment prepared by Biosis for the subject site and all Aboriginal objects were avoided during fence installation works. Prior to fencing being installed, the boundary of GR2 was digitally mapped followed by pegs being place approximately 5 metres outside the archaeological site's boundary. Fencing was then installed on the outside of this like so that the archaeological site was not physically impacted. No other archaeological site or Aboriginal object was in proximity to the line of protective fencing.

Biosis and Guntawang discussed the project via phone call on 14 January 2024:

Hi Wendy, Thank you for your time on the phone this afternoon.

As discussed, I have included the notes below from our conversation. Please review and let me or Molly know if there are any additional comments questions.

- *Sub-surface excavations to be undertaken in the study area.*

- *Any Aboriginal artefacts identified are to be reburied on site as they should be taken back to Country. Once artefact are bagged after excavations they spend a long time in consultants offices. RAPs are not always notified if they have been reburied or not.*
- *Signs to be put up for the interpretation of the site – this could be a painting of the artefacts with an explanation of what the artefacts were used for.*

I have also included a response below as to why excavations were not recommended within the draft ACHA:

Based on the results of the field investigation and previous test excavations undertaken by KNC the study area displays sporadic, and isolated deposits of archaeological material. These areas of material are restricted to the areas of minimal disturbance such as at AHIMS 45-5-5821/Guntawong Road 4 on the northern boundary of the study area, and AHIMS 45-5-5766/Guntawong Road 2 in the western portion of the study area associated with the flat landform in close proximity to the drainage line. Disturbances in the eastern and central portions (disturbance in eastern portion - stock yards and areas of cut and fill earthworks present; disturbance in central portion - removal of the native Cumberland Plain woodland) of the study area will have resulted in the removal of A horizon soils resulting in a low potential that intact sub-surface deposits are present in these areas.

A small portion of AHIMS 45-5-5766/Guntawong Road 2 will be impacted by the proposed activity. Due to the low to moderate density of artefacts, no further works is advised. The majority of AHIMS 45-5-5766/Guntawong Road 2 will not be impacted and will be conserved.

Kamilaroi Yankuntjatjara Working Group provided a response on the 29 January 2025:

Hi Molly,

Thanks for your Draft ACHAR/AR for Schofields Tallawong High School, we would like to agree and support your recommendations. We look forward to working alongside you on this project.

Biosis and Dharug Custodian Aboriginal Corporation discussed the project via phone call on 20 January 2025:

Hi Justine,

Thank you for your time on the phone yesterday. I have included the notes below from our conversation.

Please review and let me know if there are any additional comments.

- *Drove past the site last night (this would have been 29/01), and noted the following: there is full fencing with gates straight through the site (Nangamay Ngurra/our study area). Noted that they have impacted the ground, and questioned how School Infrastructure can undertake this without an AHIP. Video of fencing sent to my phone.*
- *Biosis communicated that the Aboriginal Place is a nomination and an AHIP is not required. DCAC response to this was that as the AP is not approved it should still remain untouched until it is passed/denied.*
- *DCAC is not happy with what is happening, and mentioned that the media will be involved soon, as community is not ok with what is going on.*
- *DCAC has reported the impact from the fence line to the Environment Line.*
- *DCAC would like the survey section in regards to Tony amended. This section has since been reworded.*
- *DCAC requested a map displaying the location of the installed fence line and to show how it goes through the AP nomination. We are following this up with School Infrastructure.*

5 Aboriginal cultural significance assessment

The two main values addressed when assessing the significance of Aboriginal sites are cultural values to the Aboriginal community and archaeological (scientific) values. This report will assess the cultural values of Aboriginal sites in the study area. Details of the scientific significance assessment of Aboriginal sites in the study area are provided in Appendix 5.

5.1 Introduction to the assessment process

Heritage assessment criteria in NSW fall broadly within the significance values outlined in the Australia International Council on Monuments and Sites (ICOMOS) *Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (Australia ICOMOS 2013) (the Burra Charter). This approach to heritage has been adopted by cultural heritage managers and government agencies as the set of guidelines for best practice heritage management in Australia. These values are provided as background and include:

- **Historical significance** (evolution and association) refers to historic values and encompasses the history of aesthetics, science and society, and therefore to a large extent underlies all of the terms set out in this section. A place may have historic value because it has influenced, or has been influenced by, a historic figure, event, phase or activity. It may also have historic value as the site of an important event. For any given place the significance 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.
- **Aesthetic significance** (Scenic/architectural qualities, creative accomplishment) refers to the sensory, scenic, architectural and creative aspects of the place. It is often closely linked with social values and may include consideration of form, scale, colour, texture, and material of the fabric or landscape, and the smell and sounds associated with the place and its use.
- **Social significance** (contemporary community esteem) refers to the spiritual, traditional, historical or contemporary associations and attachment that the place or area has for the present-day community. Places of social significance 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 significance be damaged or destroyed. These aspects of heritage significance can only be determined through consultative processes with local communities.
- **Scientific significance** (Archaeological, industrial, educational, research potential and scientific significance values) refers to the importance of a landscape, area, place or object because of its archaeological and/or other technical aspects. Assessment of scientific value is often based on the likely research potential of the area, place or object and will consider the importance of the data involved, its rarity, quality or representativeness, and the degree to which it may contribute further substantial information.

The cultural and archaeological significance of Aboriginal and historic sites and places is assessed on the basis of the significance values outlined above. As well as the Burra Charter significance values guidelines, various government agencies have developed formal criteria and guidelines that have application when assessing the significance of heritage places within NSW. Of primary interest are guidelines prepared by the Australian Government and Heritage NSW.

The relevant sections of these guidelines are presented below.

These guidelines state that an area may contain evidence and associations which demonstrate one or any combination of the Burra Charter significance values outlined above in reference to Aboriginal heritage. Reference to each of the values should be made when evaluating archaeological and cultural significance for Aboriginal sites and places.

In addition to the previously outlined heritage values, the Heritage NSW *Guidelines to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011) also specify the importance of considering cultural landscapes when determining and assessing Aboriginal heritage values. The principle behind a cultural landscape is that 'the significance of individual features is derived from their inter-relatedness within the cultural landscape'. This means that sites or places cannot be 'assessed in isolation' but must be considered as parts of the wider cultural landscape. Hence the site or place will possibly have values derived from its association with other sites and places. By investigating the associations between sites, places, and (for example) natural resources in the cultural landscape the stories behind the features can be told. The context of the cultural landscape can unlock 'better understanding of the cultural meaning and importance' of sites and places.

Although other values may be considered – such as educational or tourism values – the two principal values that are likely to be addressed in consideration of Aboriginal sites and places are the cultural/social significance to Aboriginal people and their archaeological or scientific significance to archaeologists and the Aboriginal community. The determinations of archaeological and cultural significance for sites and places should then be expressed as statements of significance that preface a concise discussion of the contributing factors to Aboriginal cultural heritage significance.

5.2 Cultural (social significance) values

Cultural or social significance refers to the spiritual, traditional, historical and/or contemporary associations and values attached to a place or objects by Aboriginal people. Aboriginal cultural heritage is broadly valued by Aboriginal people as it is used to define their identity as both individuals and as part of a group (DECCW 2010a, p.iii). More specifically it provides:

- A 'connection and sense of belonging to Country' (DECCW 2010a, p.iii).
- A link between the present and the past (DECCW 2010a, p.3).
- A learning tool to teach Aboriginal culture to younger Aboriginal generations and the general public (DECCW 2010a, p.3).
- Further evidence of Aboriginal occupation prior to European settlement for people who do not understand the magnitude to which Aboriginal people occupied the continent (DECCW 2010a, p.3).

It is acknowledged that Aboriginal people are the primary determiners of the cultural significance of Aboriginal cultural heritage. During consultation the following information was provided by RAPs in regard to the cultural values of the study area.

During Stage 1.2 Justine Coplin (DCAC) informed Biosis that the study area was included as part of an Aboriginal Place nomination. The site holds cultural significance of Aboriginal Cultural Heritage. During the field investigation and Stage 2 and 3 of community consultation, Justine was invited to provide further knowledge on the nominated Aboriginal Place.

- Justine indicated that there was a massacre site and campsite location on the hill to the south of the first order drainage line, both outside of the study area. She noted she had learnt this information

from a man named Tony who lived in the area many years ago, although she could not recall his last name or any further details about him. When asked if there was any additional information on the massacre site and campsites, she indicated it was unlikely and that there would not be any records or ethnohistorical information on it.

- Justine also noted that the areas of First Ponds Creek was highly significant due to the number of artefacts present as well as there being a burial tree and axe head that had previously been found near First Ponds Creek. The area around First Ponds Creek also retains environmental significance, turtles present in the pond represented a significant resource to Aboriginal people.
- Her recommendations for the project were that it should not go ahead at the current location and an alternate location should be explored. She asked for clarification on why this specific site was selected despite the previously known cultural values in the area. Her view was that the site has significant cultural values and the massacre of Aboriginal people in the area has resulted in harm to Aboriginal people past and present and means the study area is not a suitable place for a school. She stated that similar development would not be allowed to occur on European burial sites and should not occur on Aboriginal ones either.
- The proposed development is within *Nangamay Ngurra* and will cause significant direct and indirect harm to Dharug heritage. This harm cannot be minimised or mitigated. Dharug Custodian Aboriginal Corporation object to the development, and recommend that the ACHA process be put on hold while an alternative location is found for the development. This is the only option to avoid harm to Nangamay Ngurra. It is disrespectful and irresponsible of NSW Department of Education NSW to propose construction in this landscape.

5.3 Historic values

Historic significance refers to associations a place or object may have with a historically important person, event, phase or activity to the Aboriginal and other communities. The study area is part of a portion of land granted to Richard Rouse in 1816 and has historically been used for pastoral and agricultural purposes.

Information provided as part of the Aboriginal community consultation indicates that the land adjacent to the study area on the hill to the south of the first order drainage line is the site of a massacre and campsite. Comments from Justine Coplin suggest that there may be few if any records associated with this massacre event.

5.4 Archaeological (scientific significance) values

An archaeological scientific assessment was undertaken for the study area and is presented in detail as part of the attached AR (Appendix 5). However, a summary of this assessment is presented in Table 5.

Table 5 Scientific significance assessment of archaeological sites recorded within the study area.

Site name	Site content	Site condition	Representativeness	Scientific significance
AHIMS 45-5-5821/ Guntawong Road 4	1 - Site contains a small number (e.g. 0–10 artefacts) or limited range of cultural materials with no evident stratification.	1 - Site in a deteriorated condition with a high degree of disturbance; lack of stratified deposits; some cultural materials remaining.	1 - Common occurrence	3 – Low scientific significance
AHIMS 45-5-5766/ Guntawong Road 2	2 - Site contains a larger number, but limited range of cultural materials; and/or some intact stratified deposit remains; and/or are or unusual example(s) of a particular artefact type.	2 - Site in a fair to good condition, but with some disturbance.	1 - Common occurrence	5 – Moderate scientific significance
AHIMS 45-5-5913/ 201 Guntawong Rd Hammerstone 1	1 - Site contains a small number (e.g. 0–10 artefacts) or limited range of cultural materials with no evident stratification.	1 - Site in a deteriorated condition with a high degree of disturbance; lack of stratified deposits; some cultural materials remaining.	1 - Common occurrence	3 – Low scientific significance
Nangamay Ngurra Aboriginal Place nomination	TBC	TBC	TBC	TBC

5.5 Aesthetic values

There is a diverse yet accessible literature regarding the identification of aesthetic values and determining aesthetic significance (Burke & Smith 2004, pp.248–249). It is generally agreed that aesthetic values are an important part of cultural heritage significance; however, they are dependent on an individual's sensory response, which means determining aesthetic value is fraught with difficulty, and should be applied on a case-by-case basis as it is not always a value applicable to archaeological sites. However, when dealing with some types of sites aesthetic values and landscape context are an important consideration. The question 'does the place have a relationship between its parts and the setting which reinforces the quality of both', while originally proposed in an architectural context (Kerr 2013, p.15), is relevant also for many sites in a local setting—such as in forests, deserts, or coastlines, where there is often an important relationship between cultural sites and the natural environment, which contribute to the values of a 'sense of place'.

The study area is relatively disturbed and is a typical example of pastoral land with moderate levels of residential development. It is also typical of the landform type present in proximity to First Ponds Creek. The landscape of the study area is closely linked with Aboriginal cultural values and provides a context for Aboriginal sites that gives a strong sense of place. The local Aboriginal community strongly identifies with the landscape of the study area, identifying it as containing moderate aesthetic significance.

5.6 Statement of significance

The significance of sites was assessed in accordance with the following criteria:

- Requirements of the Code.
- The Burra Charter.
- Guide to Investigating and Reporting on Aboriginal Heritage.

The combined use of these guidelines is widely considered to represent the best practice for assessments of Aboriginal cultural heritage. The identification and assessment of cultural heritage values includes the four values of the Burra Charter: social, historical, scientific and aesthetic values. The resultant statement of significance has been constructed for the study area based on the significance ranking criteria assessed in Table 6 to Table 9.

5.6.1 Statement of significance for AHIMS 45-5-5766/Guntawong Road 2

AHIMS 45-5-5766/Guntawong Road 2 is a low to moderate density subsurface artefact scatter which was recorded by KNC in 2024. The site is located across the lower slope of a spur running west from the ridgeline between Second Ponds and First Ponds Creek. A total of 15 artefacts were recovered from 1.5 square metres, which is a mean artefact density of 10 artefacts per square metre. The artefact assemblage consists of flake and flake fragments made of silcrete and IMT with two cores and one back blade fragment. This site was assessed as holding high cultural significance by KNC, conversations held with Justine Coplin as part of the field investigation support this assessment. AHIMS 45-5-5766/Guntawong Road 2 is also within the boundary of the *Nangamay Ngurra* Aboriginal Place nomination and is associated with a larger complex of archaeological sites in the immediate vicinity of the study area. Information provided during the field investigation notes that a massacre event also took place adjacent to the study area on the hill to the south of the first order drainage line. While it cannot necessarily be demonstrated that AHIMS 45-5-5766/Guntawong Road 2 is associated with the massacre event site, they are connected via the use of this area by Aboriginal people, both prior to and following European colonisation from 1788. Aesthetically, AHIMS 45-5-5766/Guntawong Road 2 has been subject to historical vegetation clearance, and growing development in the vicinity has resulted in cumulative impacts to the wider setting of the site.

Table 6 Significance assessment criteria

Site name	Criteria	Ranking
AHIMS 45-5-5766/Guntawong Road 2	Cultural – discussions with the local Aboriginal communities and previous assessments reflect that the site is high in cultural value. This criterion may be updated following Stage 4 consultation on the draft ACHA.	High
	Historical – the site is not connected to any historical event or personage, but is in close proximity to a reported massacre site located approximately 390m to the south-east.	Low
	Scientific – the site possesses some archaeological values.	Moderate
	Aesthetic – the site is located 184 metres south of Guntawong Road. It has been impacted by historical vegetation clearing and surrounding residential development.	Low

5.6.2 Statement of significance for AHIMS 45-5-5821/Guntawong Road 4

AHIMS 45-5-5821/Guntawong Road 4 is a low-density subsurface artefact scatter which was previously recorded by KNC in 2024. The site consists of two silcrete flakes and is located within the mid slope of a spurline running along Guntawong Road. The site is approximately 190 metres each of the first order drainage tributary and 350 metres east of First Ponds Creek. This site was assessed as holding high cultural significance by KNC, conversations held with Justine Coplin as part of the field investigation support this assessment. AHIMS 45-5-5821/Guntawong Road 4 is also within the boundary of *Nangamay Ngurra* Aboriginal Place nomination and is associated with a larger complex of archaeological sites in the immediate vicinity of the study area. Information provided during the field investigation notes that a massacre event also took place adjacent to the study area on the hill to the south of the first order drainage line. While it cannot necessarily be demonstrated that AHIMS 45-5-5821/Guntawong Road 4 is associated with the massacre event site, they are connected via the use of this area by Aboriginal people, both prior to and following European colonisation from 1788. Aesthetically, AHIMS 45-5-5821/Guntawong Road 4 has been subject to less historical vegetation clearance in comparison to the remainder of the study area, with aerial imagery indicating this area has retained vegetation since at least the 1940s. However, growing development in the vicinity has resulted in cumulative impacts to the wider setting of the site.

Table 7 Significance assessment criteria

Site name	Criteria	Ranking
AHIMS 45-5-5821/Guntawong Road 4	Cultural – discussions with the local Aboriginal and previous assessments reflect that the site is high in cultural value. This criterion will be updated following Stage 4 consultation on the draft ACHA.	High
	Historical – the site is not connected to any historical event or personage, but is in close proximity to a reported massacre site located approximately 430m to the south-east.	Low
	Scientific – the site possesses some archaeological values.	Low
	Aesthetic – the site is located 34 metres south of Guntawong Road. It has been impacted by limited historical vegetation clearing and surrounding residential development.	Low

5.6.3 Statement of significance for AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1

AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 was identified during a field investigation by Biosis undertaken for this ACHA. The site consists of an isolated artefact located on the surface of an access track within the southern portion of the study area. The artefact consisted of a quartzite river cobble fragment with battering damage on the intact distal end consistent with use as a hammerstone. The artefact displayed some damage from vehicle use of an access track. The artefact was not *in situ* and has been deposited in its location by non-cultural actions. Conversations held with Justine Coplin as part of the field investigation indicate that all sites in this area are of high cultural significance. AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 is also within the boundary of the *Nangamay Ngurra* Aboriginal Place nomination and is associated with a larger complex of archaeological sites in the immediate vicinity of the study area. Information provided during the field investigation notes that a massacre event also took place adjacent to the study area on the hill to the south of the first order drainage line. While it cannot necessarily be demonstrated that AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 is associated with the massacre event site (particularly considering its disturbed context), they are connected via the use of this area by Aboriginal people, both prior to and following European colonisation from 1788. Aesthetically, AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 is not *in situ* and its original context is not known. The aesthetic

value of this site is considered low as a result, while growing development in the vicinity has resulted in cumulative impacts to the wider landscape.

Table 8 Significance assessment criteria

Site name	Criteria	Ranking
AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1	Cultural – discussions with the local Aboriginal communities and previous assessments reflect that the site is high in cultural value. This criterion will be updated following Stage 4 consultation on the draft ACHA.	High
	Historical – the site is not connected to any historical event or personage, but is in close proximity to a reported massacre site located approximately 270m to the south-east.	Low
	Scientific – the site possesses some archaeological values.	Low
	Aesthetic – the site is located 200 metres south of Guntawong Road. The site is not in situ, and the site location has been impacted by residential development and historical vegetation clearance.	Low

5.6.4 Statement of significance for *Nangamay Ngurra* Aboriginal Place nomination

An application for the nomination of *Nangamay Ngurra* as an Aboriginal Place outlines the components and significance of this site. The application notes the presence of a ceremonial and men's site, a burial place, and camp sites on the ridge lines. The application is based on both evidence gathered from archaeological assessments since 2008, as well as knowledge shared within and by the Aboriginal community on this place and the wider area. *Nangamay Ngurra* includes a complex of archaeological sites which provide tangible evidence of the Dharug occupation within the study area and vicinity. The archaeological sites listed in the *Nangamay Ngurra* Aboriginal Place nomination include:

- AHIMS 45-5-4311/A7 Archaeological Complex. This includes sites A6, A8, RV27 AND RV26. The sites include surface scatters, isolated finds, sub-surface archaeological deposits, possible hearths and possible culturally modified trees.
- AHIMS 45-5-4955/First Ponds 1
- AHIMS 45-5-5418/Guntawong IF1
- AHIMS 45-5-5419/Guntawong AS2
- AHIMS 45-5-5420/Clarke Guntawong AS1
- AHIMS 45-5-5421/Clarke AS1
- AHIMS 45-5-5422/Clarke AS2
- AHIMS 45-5-5425/Guntawong AS1
- AHIMS 45-5-5765/Guntawong Road 1
- AHIMS 45-5-5766/Guntawong Road 2
- AHIMS 45-5-5018/ CS-AD-01
- An unregistered artefact scatter site.

The Aboriginal Place nomination notes that *Nangamay Ngurra* has high cultural significance, and the area would have been utilised by all clans of Dharug who would travel to meet within this area. It is the location of

a ceremonial / men's site which is known by representatives in the Aboriginal community, while specially modified trees indicate the presence of burials (as noted by Justine Coplin during the field investigation by Biosis). The presence of a burial place demonstrates strong spiritual connection between Dharug and other Aboriginal people with this place. Both tangible and intangible cultural heritage values associated with this place are noted as extremely important as a connection with Country and the ancestors. Information provided during the field investigation notes that a massacre event also took place adjacent to the study area on the hill to the south of the first order drainage line. While it cannot necessarily be demonstrated that *Nangamay Ngurra* Aboriginal Place nomination is associated with the massacre event site, they are connected via the use of this area by Aboriginal people, both prior to and following European colonisation from 1788. Aesthetically, *Nangamay Ngurra* Aboriginal Place nomination has been subject to historical vegetation clearance, and growing development in the vicinity has resulted in cumulative impacts to the wider setting of the site.

Table 9 Significance assessment criteria

Site name	Criteria	Ranking
<i>Nangamay Ngurra</i> Aboriginal Place nomination	Cultural – discussions with the local Aboriginal communities as presented in the Aboriginal Place nomination, and those held with the RAP representative during the field investigation reflect that the site is very high in cultural value. This criterion will be updated following Stage 4 consultation on the draft ACHA.	High
	Historical – information provided during the field investigation reports that a massacre event took place within this site, but which is outside of this ACHAs study area, approximately 150m to the south-east.	Low
	Scientific – according to the scientific assessment criteria, the site possesses some archaeological values. However, the high number of sites and relative density within the broader site should be considered.	TBC
	Aesthetic – the site is located at 201 Guntawong Road. It has been impacted by historical vegetation clearing and some residential development within the site, but which increases in intensity and density in the wider landscape setting of this site.	Low

6 Development limitations and mitigation measures

There are three recorded Aboriginal sites and one nominated Aboriginal Place that may be subject to harm within the study area. It is expected that potential harm to Aboriginal archaeological sites from the development in the study area is high. Strategies to avoid or minimise harm to Aboriginal heritage in the study area are discussed below. A summary of the potential impacts of the proposed works on known Aboriginal sites within the study area is provided in Table 10 and Figure 5.

Table 10 Summary of potential archaeological impact

AHIMS site no.	Site name	Scientific Significance	Type of harm	Degree of harm	Mitigation measures
AHIMS 45-5-5821	Guntawong Road 4	Low	Direct	Total loss of value	Avoidance of site, heritage induction and development on an ACHMP. AHIP to impact should be obtained.
AHIMS 45-5-5766	Guntawong Road 2	Moderate	Direct	Total loss of value	Avoidance of site, fencing, heritage induction and development on an ACHMP. If site cannot be avoided, an AHIP to impact and salvage should be obtained.
AHIMS 45-5-5913	201 Guntawong Rd Hammerstone 1	Low	Direct	Total loss of value	Avoidance of site, heritage induction and development on an ACHMP. AHIP to impact should be obtained.
Nangamay Ngurra Aboriginal Place nomination	Nominated Aboriginal Place <i>Nangamay Ngurra</i>	TBC	Direct	Partial loss of value	Avoidance of site, heritage induction and development on an ACHMP. Where avoidance is not possible, and if the nominated is approved by Heritage NSW an AHIP to impact should be obtained.

6.1 Potential risks to Aboriginal cultural heritage

As previously outlined, the proposed works involve the activity of a new high school, which will comprise of the following works:

- Three learning hubs (three-storey in height) accommodating 49 general teaching spaces and three SLU.
- Other core facilities including amenities, library, staff hub and administrative areas.
- Standalone school hall.
- Separate carpark with 72 spaces.
- Kiss and drop zone along Nirmal Street.
- Open play space including sports courts and sports field.
- Public domain works.

The proposed site access arrangements are as follows:

- Main pedestrian entrance to be located off Nirmal Street.
- Kiss and drop zone proposed along Nirmal Street.
- Onsite parking access via Nirmal Street.

Left unmitigated, these activities have potential to completely remove or disturb archaeological deposits and Aboriginal objects.

6.2 Avoiding harm to Aboriginal heritage

Harm cannot be avoided to Aboriginal sites within the study area as a part of the proposed works. The proponent has advised Biosis that a redesign in order to achieve complete avoidance is not viable.

Complete avoidance of *Nanagamay Ngurra* through redesign

A nominated Aboriginal Place, *Nanagamay Ngurra* has been identified by a RAP group as being very culturally significant. The RAP representative during the survey identified that the study area makes up part of a large site which consists of a men's site, ceremonial grounds and burial place.

It was recommended that DoE provide other options for the development of the school in order to mitigate impacts to Aboriginal cultural heritage. DoE have advised the following in regards to the site selection for the proposed Schofields-Tallawong High School:

DoE assessed three potential sites to develop the Schofields-Tallawong High School to meet current and future demand for public high-school tuition in the area. Optioneering was limited to these three sites based on the high forecasted demographic growth and the limited number of land parcels available for acquisition within the area of service need.

The two other potential school sites were investigated for development in accordance with DoE property due diligence processes. These other two sites were discounted for the following reasons:

- An available land parcel located in the area was discounted as it was located near an active abattoir and in an area where precinct development of critical infrastructure (roads and services) and land rezoning requirements would not be available in time to allow the school to be developed in time to address the service need.
- An available land parcel in the area was discounted as it was too close to an existing high school (approximately 500m away from Rouse Hill High School). In addition, the land parcel was zoned for future government housing supply initiatives and has an on-site water detention basin which would have significantly impeded construction and operation of a school on the land.

As neither of the above sites were suitable for development to meet the growing student service need in this area, the current Schofields-Tallawong site was selected for development.

DoE also confirms that based on the Aboriginal cultural heritage investigations, impacts to the archaeological site AHIMS 45-5-5766/Guntawong Road 2 have been reduced through redesign. The majority of the AHIMS 45-5-5766/Guntawong Road 2 site within the high school area will now not be impacted, and will be conserved and protected from harm as an area of natural drainage overflow. As minor impacts to AHIMS 45-5-5766/Guntawong Road 2 will occur, an AHIP to impact will need to be obtained and a no harm area for the remainder of the site will be fenced to ensure the area is protected.

6.3 Ecologically Sustainable Development

One of the primary aims of the NPW Act is the 'conservation of objects places and features ... of cultural value within the landscape, including ... places, objects and features of significance to Aboriginal people ...' ((s.2A(1)(b)(i)). The *Operational Policy: Protecting Aboriginal Cultural Heritage (Version 2)* (DECC NSW 2011) provides guidance to proponents in term of Ecologically Sustainable Development (ESD).

ESD has been defined in Part 3, 6. (2) Objective of the Authority of the *Protection of the Environment Administration Act* 1991 (NSW). This outlines that the ESD requires the integration of economic and environmental considerations (including cultural heritage) in the decision-making process. Regarding Aboriginal cultural heritage, ESD can be achieved by applying the principle of intergenerational equity and the precautionary principle.

Intergenerational equity

The principle of intergenerational equity states that the present generation should make every effort to ensure the health, diversity and productivity of the environment – which includes cultural heritage – for the benefit of future generations.

In terms of Aboriginal cultural heritage, intergenerational equity can be considered in terms of the 'cumulative impacts' of any proposal to Aboriginal objects and places. For example, if few Aboriginal objects and places remain in a region (because of harm authorised under previous AHIPs), fewer opportunities remain for future generations of Aboriginal people to enjoy the cultural benefits of those Aboriginal objects and places.

Information about the significance of Aboriginal cultural heritage values associated with the Aboriginal objects and places proposed to be harmed will be relevant to the consideration of intergenerational equity and an understanding of the cumulative impacts of a proposal.

Where there is uncertainty, the precautionary principle should also be followed (see below).

The precautionary principle

The precautionary principle states that the lack of full scientific certainty about the threat of harm should not be used as a reason for not taking measures to prevent harm from occurring.

In applying the precautionary principle, decisions should be guided by:

- *a careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment (which includes cultural heritage)*
- *an assessment of the risk-weighted consequences of various options.*

The precautionary principle is relevant to Heritage NSW consideration of potential harm to Aboriginal cultural heritage where:

- *the proposal involves a risk of serious or irreversible harm to Aboriginal objects or places or to the value of those objects or places, and*
- *there is a lot of uncertainty about the significance of Aboriginal cultural heritage values of the Aboriginal objects or places proposed to be harmed.*

Where this is the case, a precautionary approach should be taken and all cost-effective measures implemented to prevent or reduce harm to the Aboriginal objects/place (DECC NSW 2011, p.26).

This assessment has gathered information from historical sources, past archaeological assessments, an Aboriginal Place nomination and from RAPs regarding the study area and vicinity. The collation and presentation of this information will contribute to a wider set of data for Schofields, Riverstone and Rouse Hill along with other surrounding suburbs. It is important that this information is made available to current and future generations to allow for sharing of knowledge and enable intergenerational equity. Biosis encourages use of the precautionary principle to avoid or minimise harm to Aboriginal objects and cultural heritage.

6.4 Management and mitigation measures

Ideally, heritage management involves conservation of sites through the preservation and conservation of fabric and context within a framework of 'doing as much as necessary, as little as possible' (Australia ICOMOS 2013). In cases where conservation is not practical, several options for management are available. For sites, management often involves the salvage of features or artefacts, retrieval of information through excavation or collection (especially where impact cannot be avoided) and interpretation.

Avoidance of impact to archaeological and cultural heritage sites through the design of the development is the primary mitigation and management strategy and should be implemented where practicable.

6.4.1 Avoidance through redesign

As per the outcomes of community consultation, it was recommended that DoE should investigate another study area for the development of the new high school in order to avoid impact to the *Nangamay Ngurra* Aboriginal Place nomination.

DoE assessed three potential sites to develop the Schofields-Tallawong High School to meet current and future demand for public high-school tuition in the area. Optioneering was limited to these three sites based on the high forecasted demographic growth and the limited number of land parcels available for acquisition within the area of service need (refer to Section 6.2).

DoE also confirms that based on the Aboriginal cultural heritage investigations, impacts to archaeological site AHIMS 45-5-5766/Guntawong Road 2 have been reduced through redesign. The majority of the AHIMS 45-5-5766/Guntawong Road 2 site within the high school area will now not be impacted and will be conserved and protected from harm as an area of natural drainage overflow. As minor impacts to AHIMS 45-5-5766/Guntawong Road 2 will occur, an AHIP to impact will need to be obtained and a no harm area for the remainder of the site will be fenced to ensure the area is protected.

6.4.2 Continue Aboriginal community consultation

As per the consultation requirements it is recommended that a copy of this report is provided to RAPs. It is also recommended that the proponent should continue to inform RAPs about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project.

6.4.3 Apply for an AHIP to impact AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1

If impacts to AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 cannot be avoided through redesign, it is recommended that an AHIP covering the development footprint be obtained from Heritage NSW prior to impacts occurring. An AHIP is required for any activities likely to have an impact on Aboriginal objects or Places, or that cause land to be

disturbed for the purposes of discovering an Aboriginal object. **The AHIP should be for a term of five (5) years.**

A small portion of AHIMS 45-5-5766/Guntawong Road 2 will be impacted by the proposed activity. Due to the low to moderate density of artefacts, no further works is advised. The majority of AHIMS 45-5-5766/Guntawong Road 2 will not be impacted and will be conserved.

The AHIP will allow for impacts to AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 to occur through the proposed development and community collection of 45-5-5913/201 Guntawong Rd Hammerstone 1.

Advice preparing AHIPs

An AHIP is required for any activities likely to have an impact on Aboriginal objects or Places or cause land to be disturbed for the purposes of discovering an Aboriginal object. Heritage NSW issues AHIPs under Part 6 of the NPW Act.

AHIPs should be prepared by a qualified archaeologist and lodged with Heritage NSW. Once the application is lodged processing time can take between 8-12 weeks. It should be noted that there will be an application fee levied by the Heritage NSW for the processing of AHIPs, which is dependent on the estimated total cost of the development project.

6.4.4 Community surface collection of AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1

AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 should be salvaged through community surface collection as part of the AHIP to impact. This ensures that the most information possible is obtained from the sites prior to their destruction. This not only increases current understanding of the site but increases our knowledge of Aboriginal occupation in the wider Blacktown region and ensures that any scientific and cultural information that we obtain can be accessed and used by future generations.

6.4.5 Fencing of AHIMS 45-5-5766/Guntawong Road 2 and area of moderate archaeological potential

Prior to any construction works taking place, the majority of AHIMS 45-5-5766/Guntawong Road 2 and the area of moderate archaeological potential which will not be impacted should be conserved and fenced off and secured, to ensure it will not be harmed by the proposed works. Fencing must remain in place over the over the lifespan of construction phase. Should future development work propose to impact AHIMS 45-5-5766/Guntawong Road 2, then an AHIP will need to be obtained from Heritage NSW. Further archaeological investigation in the form test excavations is not recommended for AHIMS 45-5-5766/Guntawong Road 2 as the majority of site will be avoided through redesign.

6.4.6 Aboriginal Cultural Heritage Management Plan

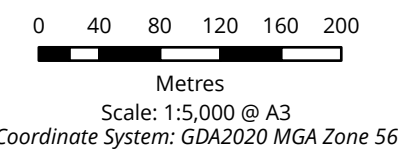
It is recommended an ACHMP be developed to appropriately manage Aboriginal cultural heritage identified within the study area. An ACHMP sets out specific guidelines and protocols for the management of Aboriginal heritage across the life of the project inclusive of construction and operational use. This should be inclusive of unanticipated finds protocols, the requirement for heritage inductions to be undertaken by the site personnel prior to works, and long-term care and control of Aboriginal archaeological materials. The ACHMP must be prepared by a suitably qualified archaeologist in consultation with the RAPs for the project.

6.4.7 Heritage Interpretation Plan

Given the significance of the region to Aboriginal people, there is an opportunity for heritage interpretation as part of the design. Heritage interpretation is an innovative way to integrate culture into design and can not only honour the deep-rooted connection to the land but also ensure that Aboriginal cultural heritage remains present in the daily operations of the proposed high school. As such, it is recommended that a Heritage Interpretation Plan be prepared by a suitably qualified heritage consultant following the NSW Heritage Council's *Interpreting Heritage Places and Items Guidelines*.

Biosis understands that this recommendation has been captured within the Connecting with Country program undertaken by DoE.

Figure 5.1 This figure has been removed for public exhibition



Matter: 40105, Date: 20 December 2024,
Prepared for: MC, Prepared by: AA., Last edited by: aabid
Location: P:\401005\40105\Mapping\
40105_Tallawong_ACHA,
Layout: 40105_AR_F5.1_ImpactAssessment

Figure 5.2 This figure has been removed for public exhibition

0 20 40 60 80 100



Metres

Scale: 1:3,000 @ A3

Coordinate System: GDA2020 MGA Zone 56



Matter: 40105, Date: 20 December 2024,
Prepared for: MC, Prepared by: AA., Last edited by: aabid
Location: P:\401005\40105\Mapping\
40105_Tallawong_ACHA,
Layout: 40105_AR_F5.2_ImpactAssessment

7 Recommendations

Strategies have been developed based on the archaeological (significance) of cultural heritage relevant to the study area and influenced by:

- Predicted impacts to Aboriginal cultural heritage.
- The planning approvals framework.
- Current best conservation practise, widely considered to include:
 - Ethos of the Australia ICOMOS Burra Charter.
 - The Code.

Prior to any impacts occurring within the study area, the following is recommended.

Recommendation 1: Continued consultation with the registered Aboriginal parties

It is recommended that DoE continue to inform these groups about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project. This recommendation is in keeping with the consultation requirements.

Recommendation 2: Application for an AHIP to impact AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1

If avoidance through redesign is unable to occur, it is recommended that that DoE apply to Heritage NSW, NSW Department of Climate change, Energy, the Environment and Water (Heritage NSW) for an AHIP to destroy AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 and to partially impact AHIMS 45-5-5766/Guntawong Road 2 which are currently protected under the NPW Act. The AHIP should be for a term of five years.

A small portion of AHIMS 45-5-5766/Guntawong Road 2 will be impacted by the proposed activity. Due to the low to moderate density of artefacts, no further works is advised. The majority of AHIMS 45-5-5766/Guntawong Road 2 will not be impacted and will be conserved (refer to Recommendation 3).

It is recommended that the surface stone artefacts associated with AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 is collected prior to construction.

Recommendation 3: Fencing of AHIMS 45-5-5766/Guntawong Road 2

Prior to any works taking place, the majority of AHIMS 45-5-5766/Guntawong Road 2 and the area of moderate archaeological potential which will not be impacted are to be conserved and should be clearly fenced to ensure they will not be harmed by the proposed activity. Fencing must remain in place over the lifespan of the construction phase.

Recommendation 4: No further archaeological work required in the area of low potential once AHIP obtained from Heritage NSW

No further archaeological work is required in the area of low potential except in the event that unexpected human remains are unearthed during any phase of the project (refer to Recommendation 7).

Recommendation 5: Discovery of unanticipated Aboriginal objects

All Aboriginal objects and Places are protected under the NPW Act. It is an offence to disturb an Aboriginal site without a consent permit issued by Heritage NSW. Should any unanticipated Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying Heritage NSW and Aboriginal stakeholders.

Recommendation 6: Discovery of unanticipated historical relics

Relics are historical archaeological resources of local or State significance and are protected in NSW under the *Heritage Act 1977*. Relics cannot be disturbed except with a permit or exception/exemption notification. Should unanticipated relics be discovered during the course of the project, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find. The Heritage Council will require notification if the find is assessed as a relic.

Recommendation 7: Discovery of human remains

If any suspected human remains are discovered during any activity you must:

1. Immediately cease all work at that location and not further move or disturb the remains.
2. Notify the NSW Police and Heritage NSW Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
3. Not recommence work at that location unless authorised in writing by Heritage NSW.

Recommendation 8: Development of an Aboriginal Cultural Heritage Management Plan

It is recommended an Aboriginal Cultural Heritage Management Plan (ACHMP) be developed to appropriately manage Aboriginal cultural heritage identified within the study area. An ACHMP sets out specific guidelines and protocols for the management of Aboriginal heritage across the life of the project inclusive of construction and operational use. This should be inclusive of unanticipated finds protocols, the requirement for heritage inductions to be undertaken by the site personnel prior to works, and long-term care and control of Aboriginal archaeological materials. The ACHMP must be prepared by a suitably qualified archaeologist in consultation with the RAPs for the project.

Recommendation 9: Heritage Interpretation plan

Given the significance of the region to Aboriginal people, there is an opportunity for heritage interpretation as part of the design. Heritage interpretation is an innovative way to integrate culture into design and can not only honour the deep-rooted connection to the land but also ensure that Aboriginal cultural heritage remains present in the daily operations of the proposed high school. As such, it is recommended that a Heritage Interpretation Plan be prepared by a suitably qualified heritage consultant following the NSW Heritage Council's *Interpreting Heritage Places and Items Guidelines*.

Biosis understands that this recommendation has been captured within the Connecting with Country program undertaken by DoE.

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Appendices

Appendix 1 Consultation log

Stage 1: Notification of project proposal and registration of interest

Step 1: Identification of Aboriginal people/parties with an interest in the proposed study area.

Organisation contacted	Date and type of contact	Date and type of response	Response details
Heritage NSW	27/08/2024 – Email	05/09/2024 – Email	Provided a list of Aboriginal parties who may be interested in registering their interest in the project.
Native Title Services CORP Limited	27/08/2024 – Email	n/a	n/a
Office of the Registrar, Department of Aboriginal Affairs	27/08/2024 – Email	27/08/2024 – Email	Provided the details for Deerubbin Local Aboriginal Land Council.
National Native Title Tribunal	27/08/2024 – Email	28/08/2024 - Email	Confirmed there are no native title claims for the study area.
Greater Sydney Local Land Services	27/08/2024 – Email	n/a	n/a
Blacktown City Council	27/08/2024 – Email	n/a	n/a
Deerubbin Local Aboriginal Land Council	27/08/2024 – Email	n/a	n/a

Step 2: Public advertisement

The public notice was published in the Daily Telegraph on the 13 September 2024. A copy of the advertisement is provided in Appendix 2.

Step 3: Registration of interest.

The registration period ran from the 12 to 26 September 2024, a second registration period ran for applicants on the Aboriginal Place application. This ran from 10 October 2024 to 24 October 2024. Leeway was given to Aboriginal parties/groups who provided responses shortly after the close of this period and they have been registered as Aboriginal parties for consultation.

Organisation contacted	Date and type of contact	Date and type of response	Response details
Deerubbin Local Aboriginal Land Council	12/09/2024 – Email	n/a	n/a
A1 Indigenous Services	12/09/2024 – Email	12/09/2024 – Email	Registered for the project.
Amanda Hickey Cultural Services	12/09/2024 – Email	n/a	n/a

Organisation contacted	Date and type of contact	Date and type of response	Response details
Aragung Aboriginal Cultural Heritage Site Assessments	12/09/2024 – Email	n/a	n/a
B.H. Heritage Consultants	12/09/2024 – Email	n/a	n/a
B.H. Heritage Consultants	12/09/2024 – Email	n/a	n/a
Badu (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Bidjawong Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Bidjawong Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Bilinga (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Butucarbin Aboriginal Corporation	12/09/2024 – Email	16/09/2024 – Email	Registered for the project.
Clive Freeman	12/09/2024 – Email	n/a	n/a
Corroboree Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Cullendulla (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Darug Boorooberongal Elders Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Dharug Custodian Aboriginal Corporation	12/09/2024 – Email	13/09/2024 – Email	Registered for the project and requested a map of the study area.
		16/09/2024 – Email	Provided information on the Aboriginal Place application located in the study area.
		8/10/2024 - Phone	Biosis followed up with a phone call to gain further information.
Deerubbin Local Aboriginal Land Council	12/09/2024 – Email	n/a	n/a
Dharug (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Didge Ngunawal Clan	12/09/2024 – Email	12/09/2024 – Email	Registered for the project.
DJMD Consultancy	12/09/2024 – Email	n/a	n/a
Gilay Consultants	12/09/2024 – Email	n/a	n/a
Ginninderra Aboriginal Corporation	12/09/2024 – Email	18/09/2024 – Email	Registered for the project.

Organisation contacted	Date and type of contact	Date and type of response	Response details
Goobah Development PTY LTD (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Goobah Development PTY LTD (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Goodradigbee Cultural & Heritage Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Gulaga	12/09/2024 – Email	n/a	n/a
Gunjeewong Cultural Heritage Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Gunyuu (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
HSB Consultants; HSB Heritage Consultants	12/09/2024 – Email	n/a	n/a
Jerringong (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Julia Narayan	12/09/2024 – Email	n/a	n/a
Kamilaroi Yankuntjatjara Working Group	12/09/2024 – Email	18/09/2024 – Email	Registered for the project.
Konanggo Aboriginal Cultural Heritage Services	12/09/2024 – Email	n/a	n/a
Koori Digs Services	12/09/2024 – Email	n/a	n/a
Munyunga (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Mura Indigenous Corporation (icn:8991)	12/09/2024 – Email	n/a	n/a
Muragadi Heritage Indigenous Corporation	12/09/2024 – Email	23/09/2024 – Email	Registered for the project.
Murra Bidgee Mullangari Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Murramarang (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Murrumbul (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Ngambaa Cultural Connections	12/09/2024 – Email	24/09/2024 – Email	Registered for the project.
Nundagurri (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a

Organisation contacted	Date and type of contact	Date and type of response	Response details
Pemulwuy (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Thauaira	12/09/2024 – Email	n/a	n/a
Thomas Dahlstrom	12/09/2024 – Email	16/09/2024 – Email	Registered for the project.
Thoorga Nura	12/09/2024 – Email	n/a	n/a
Waawaar Awaa Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Wailwan Aboriginal Group	12/09/2024 – Email	n/a	n/a
Walgalu (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Wingikara (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Woka Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Wori Woilywa	12/09/2024 – Email	n/a	n/a
Wullung (Murrin Clan/Peoples)	12/09/2024 – Email	n/a	n/a
Wurrumay Culture Heritage Consultants	12/09/2024 – Email	27/09/2024 – Email 14/10/2024 – Email	Registered for the project.
Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Yulay Cultural Services	12/09/2024 – Email	n/a	n/a
Yurrandaali	12/09/2024 – Email	n/a	n/a
Bariyan Cultural Connections	12/09/2024 – Email	n/a	n/a
Wallanbah Aboriginal Site Conveyancing	12/09/2024 – Email	n/a	n/a
RAW Cultural Healing	12/09/2024 – Email	n/a	n/a
Dharramalin	12/09/2024 – Email	n/a	n/a
Long Gully Cultural Services	12/09/2024 – Email	n/a	n/a
Guthers Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Gadu chts	12/09/2024 – Email	n/a	n/a
Pearl Depoma	12/09/2024 – Email	13/09/2024 – Email	Registered for the project.
Nattai Aboriginal Culture & Heritage Consultation Service	12/09/2024 – Email	n/a	n/a

Organisation contacted	Date and type of contact	Date and type of response	Response details
Mura Gadi Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Debbie Moon	12/09/2024 – Email	n/a	n/a
Darug Aboriginal Resource Centre	12/09/2024 – Email	n/a	n/a
Wallangang Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Ross Tangye	12/09/2024 – Email	n/a	n/a
Paul Webb	12/09/2024 – Email	n/a	n/a
Barking Owl Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Black Duck Aboriginal Corporation	12/09/2024 – Email	n/a	n/a
Guntawang Aboriginal Corporation	12/09/2024 – Email	12/09/2024 – Email	Registered for the project.
Minnamunnung	12/09/2024 – Email	n/a	n/a
Mundawari Heritage Consultants	12/09/2024 – Email	13/09/2024 - Email	Registered for the project.
Paul Gale	12/09/2024 – Email	n/a	n/a
Thawun Aboriginal Consultancy	12/09/2024 – Email	n/a	n/a
Thawun Aboriginal Consultancy	12/09/2024 – Email	n/a	n/a
Yurwang Gundana Consultancy Cultural Heritage Services.	12/09/2024 – Email	n/a	n/a
Yurwang Gundana Consultancy Cultural Heritage Services.	12/09/2024 – Email	n/a	n/a
Gali Heritage Consultants	12/09/2024 – Email	n/a	n/a
Bill Trewlynn	12/09/2024 – Email	n/a	n/a
Leanne Watson	10/10/2024 - Email	n/a	n/a
Julie Jones Webb	10/10/2024 - Email	15/10/2024 – Email	Registered for the project.
Erin Wilkens	10/10/2024 - Email	n/a	n/a
Elizabeth Coplin	10/10/2024 - Email	n/a	n/a
Tylah Blunden	10/10/2024 - Email	n/a	n/a
Jacinta Tobin	10/10/2024 - Email	n/a	n/a

Step 4: Field survey

Organisation contacted	Date and type of contact	Date and type of response	Response details
Dharug Custodian Aboriginal Corporation	10/10/2024 - Phone	11/10/2024 - Phone	Asking Justine Coplin for availability to attend the survey on 21 October 2024.
Dharug Custodian Aboriginal Corporation	21/10/2024 - Phone	21/10/2024 - Phone	Asking Justine Coplin for availability to attend the survey on 23 October 2024.

Stage 2: Presentation of information about the proposed project

Step 1: Provision of project information pack

A copy of the information pack is provided in Appendix 3 and a copy of the covering email is provided following.

Organisation contacted	Date and type of contact	Date and type of response	Response details
Deerubbin Local Aboriginal Land Council	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
A1 Indigenous Services	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Confidential Party 1	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Didge Ngunawal Clan	31/10/2024 – Email 21/11/2024 – Reminder email	21/11/2024 – Email	Happy with the information provided and would like to be included in any fieldwork.
Pearl Depoma	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Guntawang Aboriginal Corporation	31/10/2024 – Email	1/11/2024 – Email	No comments regarding the project information pack.
Mundawari Heritage Consultants	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Dharug Custodian Aboriginal Corporation	31/10/2024 – Email 21/11/2024 – Reminder email	27/11/2024 - Email	Confirmed receipt of the project information pack and responded with the following: <i>The proposed development is within Nangamay Ngurra</i>

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<p>and will cause significant direct and indirect harm to Dharug heritage. This harm cannot be minimised or mitigated.</p> <p>We object to the development, and recommend that the ACHA process be put on hold while an alternative location is found for the development. This is the only option to avoid harm to Nangamay Ngurra. It is disrespectful and irresponsible of School Infrastructure NSW to propose construction in this landscape.</p> <p>The location and significance of the A7 Archaeological Complex has been known since 2008. Since then, cumulative impact to the complex has been facilitated by a focus on archaeological significance and on discrete archaeological sites and developments, and a neglect of the overall Dharug landscape. This approach is evident in the proposed assessment methodology.</p> <p>If the proponent chooses to proceed with the ACHA, we require an amended assessment methodology, including additional and detailed information about how the impact on Nangamay Ngurra will be investigated, assessed and avoided.</p>
Wailwan Aboriginal Group	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Yulay Cultural Services	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Kamilaroi Yankuntjatjara Working Group	31/10/2024 – Email	n/a	n/a

Organisation contacted	Date and type of contact	Date and type of response	Response details
	21/11/2024 – Reminder email		
Thomas Dahlstrom	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Ginninderra Aboriginal Corporation	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Butucarbin Aboriginal Corporation	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Julie Jones Webb	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Wurrumay Culture Heritage Consultants	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Murra Bidgee Mullangari Aboriginal Corporation	31/10/2024 – Email	6/11/2024 – Email	Confirmed they have read the project information.
Muragadi Heritage Indigenous Corporation	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Ngambaa Cultural Connections	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a

Stage 3: Gathering information about cultural significance

Step 1- Provision of project methodology pack and consultation meeting

A copy of the methodology pack is provided in Appendix 3 and a copy of the covering email is provided following.

Organisation contacted	Date and type of contact	Date and type of response	Response details
Deerubbin Local Aboriginal Land Council	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
A1 Indigenous Services	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Confidential Party 1	31/10/2024 – Email	n/a	n/a

Organisation contacted	Date and type of contact	Date and type of response	Response details
	21/11/2024 – Reminder email		
Didge Ngunawal Clan	31/10/2024 – Email 21/11/2024 – Reminder email	21/11/2024 – Email	No comments regarding the methodology.
Pearl Depoma	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Guntawang Aboriginal Corporation	31/10/2024 – Email	1/11/2024 – Email	Supports the consultation strategy and consultation with Aboriginal communities. Also supports Appendix 1 Additional consultation Protocols.
Mundawari Heritage Consultants	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Dharug Custodian Aboriginal Corporation	31/10/2024 – Email 21/11/2024 – Reminder email	27/11/2024 - Email	<p>Confirmed receipt of the project methodology and responded with the following:</p> <p><i>The proposed development is within Nangamay Ngurra and will cause significant direct and indirect harm to Dharug heritage. This harm cannot be minimised or mitigated.</i></p> <p><i>We object to the development, and recommend that the ACHA process be put on hold while an alternative location is found for the development. This is the only option to avoid harm to Nangamay Ngurra. It is disrespectful and irresponsible of School Infrastructure NSW to propose construction in this landscape.</i></p> <p><i>The location and significance of the A7 Archaeological Complex has been known since 2008. Since then, cumulative impact to the complex has been facilitated by a focus on archaeological significance and on discrete</i></p>

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<i>archaeological sites and developments, and a neglect of the overall Dharug landscape. This approach is evident in the proposed assessment methodology. If the proponent chooses to proceed with the ACHA, we require an amended assessment methodology, including additional and detailed information about how the impact on Nangamay Ngurra will be investigated, assessed and avoided.</i>
Wailwan Aboriginal Group	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Yulay Cultural Services	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Kamilaroi Yankuntjatjara Working Group	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Thomas Dahlstrom	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Ginninderra Aboriginal Corporation	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Butucarbin Aboriginal Corporation	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Julie Jones Webb	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Wurrumay Culture Heritage Consultants	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Murra Bidgee Mullangari Aboriginal Corporation	31/10/2024 – Email	6/11/2024 – Email	Confirmed they have read the ACHA methodology and endorsed the recommendations.
Muragadi Heritage Indigenous Corporation	31/10/2024 – Email	n/a	n/a

Organisation contacted	Date and type of contact	Date and type of response	Response details
	21/11/2024 – Reminder email		
Ngambaa Cultural Connections	31/10/2024 – Email 21/11/2024 – Reminder email	n/a	n/a
Dharug Custodian Aboriginal Corporation	11/12/2024 - Email	13/12/2024 - Email	<p>Biosis response:</p> <p>Good afternoon Justine,</p> <p>Thank you for providing a response on the Stage 2 and 3 consultation document for the Schofields-Tallawong High School.</p> <p>Your response will be included within the ACHA and will inform the recommendations.</p> <p>School Infrastructure NSW have advised the following in regards to the site selection for the proposed Schofields-Tallawong High School:</p> <p>School Infrastructure assessed three potential sites to develop the Schofields-Tallawong High School to meet current and future demand for public high-school tuition in the area. Optioneering was limited to these three sites based on the high forecasted demographic growth and the limited number of land parcels available for acquisition within the area of service need.</p> <p>The two other potential school sites were investigated for development in accordance with School Infrastructure property due diligence processes. These other two site were discounted for the following reasons:</p> <ul style="list-style-type: none"> • An available land parcel located in the area was discounted as it was

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<p>located near an active abattoir and in an area where precinct development of critical infrastructure (roads and services) and land rezoning requirements would not be available in time to allow the school to be developed in time to address the service need.</p> <ul style="list-style-type: none"> An available land parcel in the area was discounted as it was too close to an existing high school (approximately 500m away from Rouse Hill High School). In addition, the land parcel was zoned for future government housing supply initiatives and has an on-site water detention basin which would have significantly impeded construction and operation of a school on the land. <p>As neither of the above sites were suitable for development to meet the growing student service need in this area, the current Schofields-Tallawong site was selected for development.</p> <p>School Infrastructure also confirms that based on the Aboriginal cultural heritage investigations, impacts to the Guntawong Road 2 archaeological site (AHIMS# 45-5-5766) have been reduced through redesign. The majority of the Guntawong Road 2 site within the high school area will now not be impacted, and will be conserved and protected from harm as an area of natural drainage overflow.</p>

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<p>Dharug Custodian Aboriginal Corporation response:</p> <p>Warami Molly</p> <p>Thank you for your email. The response does not address the issues that I have raised. It suggests that neither Schools Infrastructure NSW nor Biosis has any understanding of the harm that will result from the proposed development, or any intention to properly assess or address this harm.</p> <p>The Dharug landscape Nangamay Ngurra includes a massacre site, and is not appropriate as a location for a school. The significance of the A7 Archaeological Complex has been known since 2008 and should have been considered by Schools Infrastructure NSW in their selection of a site. Their selection of the site should now be reconsidered, as the only way to avoid harm to this significant Place.</p> <p>The proposed methodology is not adequate to assess the harm to Nangamay Ngurra that will result from the development. The suggestion that this harm can be addressed by reducing the impact to AHIMS #45-5-5766, one small component of the Place, is inadequate. It continues the focus on the archaeological elements of the Place that has allowed ongoing cumulative impact to the landscape, and a neglect of its broader significance as Dharug heritage.</p>

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<p>Please provide a response that addresses these issues directly.</p> <p>The proposed methodology is not adequate to address the Aboriginal heritage impact of the development.</p> <p>We object to the development, and recommend that the ACHA process be put on hold while an alternative location is found for the development. This is the only option to avoid harm to Nangamay Ngurra. It is disrespectful and irresponsible of School Infrastructure NSW to propose construction in this landscape.</p> <p>The location and significance of the A7 Archaeological Complex has been known since 2008. Since then, cumulative impact to the complex has been facilitated by a focus on archaeological significance and on discrete archaeological sites and developments, and a neglect of the overall Dharug landscape. This approach is evident in the proposed assessment methodology.</p> <p>If the proponent chooses to proceed with the ACHA, we require an amended assessment methodology, including additional and detailed information about how the impact on Nangamay Ngurra will be investigated, assessed and avoided.</p>
Dharug Custodian Aboriginal Corporation	18/12/2024 - Email		<p>Biosis response:</p> <p>Hi Justine,</p>

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<p>Thank you for your email. We have reached out to School Infrastructure NSW and asked them to provide a response.</p> <p>Their response is as follows:</p> <p>School Infrastructure understands that the nomination of the Aboriginal Place Nangamay Ngurra is currently being assessed by Heritage NSW. The Aboriginal place determination process is managed by Heritage NSW and runs separately to the work currently being prepared by School Infrastructure.</p> <p>School Infrastructure has never proposed to impact the A7 Archaeological Complex which is located outside of the school development site. School Infrastructure has also endeavoured to reduce the degree of harm to registered sites located within the school footprint as much as possible, including preserving the majority of the AHIMS #45-5-5766 site which is in that footprint.</p>

Stage 4: Review of draft report

A copy of the draft report was provided on 20 December 2024 to all registered parties. A copy of this correspondence is provided in Appendix 4.

Organisation contacted	Date and type of contact	Date and type of response	Response details
Deerubbin Local Aboriginal Land Council	20/12/2024 - Email	n/a	n/a
A1 Indigenous Services	20/12/2024 - Email	n/a	n/a
Confidential Party 1	20/12/2024 - Email	n/a	n/a
Didge Ngunawal Clan	20/12/2024 - Email	n/a	n/a

Organisation contacted	Date and type of contact	Date and type of response	Response details
Pearl Depoma	20/12/2024 – Email	n/a	n/a
Guntawang Aboriginal Corporation	20/12/2024 – Email	14/01/2024 – Phone call	<p>Biosis email response following phone conversation:</p> <p>Hi Wendy,</p> <p>Thank you for your time on the phone this afternoon.</p> <p>As discussed, I have included the notes below from our conversation. Please review and let me or Molly know if there are any additional comments questions.</p> <p>Sub-surface excavations to be undertaken in the study area.</p> <p>Any Aboriginal artefacts identified are to be reburied on site as they should be taken back to Country. Once artefact are bagged after excavations they spend a long time in consultants offices. RAPs are not always notified if they have been reburied or not.</p> <p>Signs to be put up for the interpretation of the site – this could be a painting of the artefacts with an explanation of what the artefacts were used for.</p> <p>I have also included a response below as to why excavations were not recommended within the draft ACHA:</p> <p>Based on the results of the field investigation and previous test excavations undertaken by KNC the study area displays sporadic, and isolated deposits of archaeological material. These areas of material are restricted to the areas of minimal disturbance such as at AHIMS 45-5-</p>

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<p>5821/Guntawong Road 4 on the northern boundary of the study area, and AHIMS 45-5-5766/Guntawong Road 2 in the western portion of the study area associated with the flat landform in close proximity to the drainage line. Disturbances in the eastern and central portions (disturbance in eastern portion - stock yards and areas of cut and fill earthworks present; disturbance in central portion - removal of the native Cumberland Plain woodland) of the study area will have resulted in the removal of A horizon soils resulting in a low potential that intact sub-surface deposits are present in these areas.</p> <p>A small portion of AHIMS 45-5-5766/Guntawong Road 2 will be impacted by the proposed activity. Due to the low to moderate density of artefacts, no further works is advised. The majority of AHIMS 45-5-5766/Guntawong Road 2 will not be impacted and will be conserved.</p>
Mundawari Heritage Consultants	20/12/2024 – Email	n/a	n/a
Dharug Custodian Aboriginal Corporation	20/12/2024 – Email	8/01/2025- Email	<p>The response that you have provided from Schools Infrastructure still does not address the issues that I have raised on behalf of the Dharug community. As you know, the project area is within Nangamay Ngurra, a significant Dharug landscape that includes the mapped boundaries of the A7 Archaeological Complex. I have recommended that an alternative location</p>

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<p>should be found for the proposed development, and that the proposed assessment methodology should be amended to show how the impact on Nangamay Ngurra will be investigated, assessed and avoided. This is the responsibility of both the proponent and Biosis, as their heritage advisor.</p> <p>The Parents of the students that would be attending the school need to be informed about the history of this site, prior to enrolling their child./ children.</p>
Dharug Custodian Aboriginal Corporation		13/01/2025 – Email	<p>I visited Nangamay Ngurra last week and noticed that a fence is being built around the proposed high school location at 201 Guntawong Road, Tallawong. From what I could see, construction has involved clearing vegetation and installation of fenceposts. The property boundary passes through AHIMS #45-5-5766, and I assume there has been some harm to this site. I understand that the ACHAR is still in draft, and that there is no AHIP in place for the project. Can you please let me know how this impact is being managed?</p>
Dharug Custodian Aboriginal Corporation	29/01/2025 – Email		<p>Biosis response:</p> <p>Good morning Justine, Thank you for your email.</p> <p>We passed your queries onto School Infrastructure, and their response is as follows:</p> <p>Comment no. 1 – ongoing consultation with DCAC in relation to ACHAR preparation</p>

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<p>School Infrastructure understands that the study area is within the boundaries of the nominated Aboriginal Place Nangamay Ngurra and that Dharug Custodian Aboriginal Corporation provided their information on the cultural landscape to Biosis during their site walk on 23 October 2024. This information has been provided in the ACHAR in section 4.3.2. This assessment has been prepared in full accordance with relevant guidelines, including the Guide to investigation, assessing and reporting on Aboriginal cultural heritage in NSW.</p> <p>School Infrastructure previously shared information with Dharug Custodian Aboriginal Corporation on 11 December 2024 with detail about alternate school sites and why they were unfortunately unfeasible for the current development.</p> <p>Comment no. 2 – query related to DCAC viewing fencing installation at the Guntawong Road site:</p> <p>School Infrastructure installed fencing around the boundary of the proposed development site in order to prevent unauthorised access. This was necessary to halt the ongoing illegal dumping that has been occurring within the land parcel.</p> <p>Fencing works were informed by the archaeological assessment prepared by Biosis for the subject site and all Aboriginal objects were</p>

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<p>avoided during fence installation works. Prior to fencing being installed, the boundary of GR2 was digitally mapped followed by pegs being placed approximately 5 metres outside the archaeological site's boundary. Fencing was then installed on the outside of this line so that the archaeological site was not physically impacted. No other archaeological site or Aboriginal object was in proximity to the line of protective fencing.</p>
Dharug Custodian Aboriginal Corporation	30/1/2025- Phone call	31/01/2025- Email	<p>Hi Justine,</p> <p>Thank you for your time on the phone yesterday. I have included the notes below from our conversation.</p> <p>Please review and let me know if there are any additional comments.</p> <ul style="list-style-type: none"> • Drove past the site last night (this would have been 29/01), and noted the following: there is full fencing with gates straight through the site (Nangamay Ngurra/our study area). Noted that they have impacted the ground, and questioned how School Infrastructure can undertake this without an AHIP. Video of fencing sent to my phone. • Biosis communicated that the Aboriginal Place is a

Organisation contacted	Date and type of contact	Date and type of response	Response details
			<p>nomination and an AHIP is not required. DCAC response to this was that as the AP is not approved it should still remain untouched until it is passed/denied.</p> <ul style="list-style-type: none"> • DCAC is not happy with what is happening, and mentioned that the media will be involved soon, as community is not ok with what is going on. • DCAC has reported the impact from the fence line to the Environment Line. • DCAC would like the survey section in regards to Tony amended. This section has since been reworded. • DCAC requested a map displaying the location of the installed fence line and to show how it goes through the AP nomination. We are following this up with School Infrastructure.
Wailwan Aboriginal Group	20/12/2024 – Email	n/a	n/a
Yulay Cultural Services	20/12/2024 – Email	n/a	n/a
Kamilaroi Yankuntjatjara Working Group	20/12/2024 – Email	29/01/2025 - Email	<p>Hi Molly,</p> <p>Could i ask a favour i would like to review the report and respond however i cant access the report and i understand im over the due date.</p>

Organisation contacted	Date and type of contact	Date and type of response	Response details
			If its already closed and you cant resend i understand but if you can i will review the report today and send a response.
Kamilaroi Yankuntjatjara Working Group	29/01/2025 - Email		Biosis response: Hi Phil, No worries, please find a copy of the report in the link below. If you could please provide your response by COB today, that would be appreciated.
Kamilaroi Yankuntjatjara Working Group		29/01/2025 - Email	Hi Molly, Thanks for your Draft ACHAR/AR for Schofields Tallawong High School, we would like to agree and support your recommendations. We look forward to working alongside you on this project.
Thomas Dahlstrom	20/12/2024 – Email	n/a	n/a
Ginninderra Aboriginal Corporation	20/12/2024 - Email 20/12/2024 – Email	n/a	n/a
Butucarbin Aboriginal Corporation	20/12/2024 – Email	n/a	n/a
Julie Jones Webb	20/12/2024 – Email	n/a	n/a
Wurrumay Culture Heritage Consultants	20/12/2024 – Email	n/a	n/a
Murra Bidgee Mullangari Aboriginal Corporation	20/12/2024 – Email		
Muragadi Heritage Indigenous Corporation	20/12/2024 – Email	n/a	n/a
Ngambaa Cultural Connections	20/12/2024 – Email	n/a	n/a

Appendix 2 Stage 1: Notification of project proposal and registration of interest

Molly Crissell

From: Molly Crissell
Sent: Tuesday, 27 August 2024 1:29 PM
To: heritagemailbox@environment.nsw.gov.au
Subject: 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA
Attachments: PDFMailer.pdf

Good afternoon,

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales (NSW) (the project). The project is to be assessed as a State Significant Development (SSD) under Part 4.36 of the Environmental Planning and Assessment Act 1979.

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All correspondence regarding provision of names and contact details of Aboriginal people who may hold cultural knowledge relevant to the study area should be provided in writing by 5pm 10 September 2024 to:

Molly Crissell
Biosis Pty Ltd
Suite 8, 27 Annie St,
Wickham NSW 2293
mcrissell@biosis.com.au
Kind regards,
Molly

Molly Crissell

From: Molly Crissell
Sent: Tuesday, 27 August 2024 1:29 PM
To: information@ntscorp.com.au
Subject: 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA
Attachments: PDFMailer.pdf

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Wickham NSW 2293
mcrissell@biosis.com.au
Kind regards,
Molly

Molly Crissell

From: Molly Crissell
Sent: Tuesday, 27 August 2024 1:29 PM
To: aboriginalowners@oralra.nsw.gov.au
Subject: 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA
Attachments: PDFMailer.pdf

Good afternoon,

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Wickham NSW 2293
mcrissell@biosis.com.au
Kind regards,
Molly

Molly Crissell

From: Molly Crissell
Sent: Tuesday, 27 August 2024 1:34 PM
To: Geospatial Search Requests
Cc: Enquiries
Subject: FW: 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA
Attachments: PDFMailer.pdf; 40105.Schofields-Tallawong.HS.Geospatial.Search.DFT01.20240805.pdf

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Kind regards,
Molly

Molly Crissell She/Her
Heritage Consultant

📞 0438 390 129
✉ MCrissell@biosis.com.au
🌐 www.biosis.com.au



Leaders in Ecology, Heritage and Environmental Approvals

Molly Crissell

From: Molly Crissell
Sent: Tuesday, 27 August 2024 1:29 PM
To: admin.greatersydney@lls.nsw.gov.au
Subject: 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA
Attachments: PDFMailer.pdf

Good afternoon,

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Wales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales (NSW) (the project). The project is to be assessed as a State Significant Development (SSD) under Part 4.36 of the Environmental Planning and Assessment Act 1979.

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Wickham NSW 2293
mcrissell@biosis.com.au
Kind regards,
Molly

Molly Crissell

From: Molly Crissell
Sent: Tuesday, 27 August 2024 1:29 PM
To: council@blacktown.nsw.gov.au
Subject: 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA
Attachments: PDFMailer.pdf

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Wickham NSW 2293
mcrissell@biosis.com.au
Kind regards,
Molly

Molly Crissell

From: Molly Crissell
Sent: Tuesday, 27 August 2024 1:31 PM
To: [REDACTED]
Subject: 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA
Attachments: PDFMailer.pdf

Good afternoon,

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Kind regards,
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Molly Crissell She/Her
Heritage Consultant

📞 0438 390 129
✉ MCrissell@biosis.com.au
🌐 www.biosis.com.au



Leaders in Ecology, Heritage and Environmental Approvals

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

The contents of this email message and any attachments are intended solely for the addressee(s) and may be the subject of copyright. If you have received this email in error, notify us by return email, destroy all copies and delete it from your systems. It is your responsibility to scan this communication and any files attached (and Biosis does not accept liability for computer viruses, interference or similar).

27 August 2024

Heritage NSW
PO Box 644
Parramatta NSW 2124

Schofields-Tallawong High School: Aboriginal Cultural Heritage Assessment — Notification to Agencies

Our Ref: Matter: 40105

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales (NSW) (the project). The project is to be assessed as a State Significant Development (SSD) under Part 4.36 of the *Environmental Planning and Assessment Act 1979*.

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In accordance with Section 4.1.3 (a) of the consultation requirements, please note that the relevant client contact for this project is:

Biosis Pty Ltd
Newcastle
Suite 8, 27 Annie Street
Wickham NSW 2293

Phone: 02 4911 4040

ACN: 006 175 097

ABN :65 006 175 097

Email: newcastle@biosis.com.au

biosis.com.au



SINSW
Paul Ortiz
Schoolinfrastructure@det.nsw.edu.au

All correspondence regarding provision of names and contact details of Aboriginal people who may hold cultural knowledge relevant to the study area should be provided in writing by **5pm 10 September 2024** to:

Molly Crissell
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Wickham NSW 2293
mcrissell@biosis.com.au

If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

Yours sincerely

A handwritten signature in black ink that reads "M Crissell".

Molly Crissell
Heritage Consultant

27 August 2024

Native Title Services Corporation
PO Box 2105
Strawberry Hills NSW 2012

Schofields-Tallawong High School: Aboriginal Cultural Heritage Assessment — Notification to Agencies

Our Ref: Matter: 40105

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Yours sincerely

A handwritten signature in black ink that reads "M Crissell". The signature is written in a cursive, flowing style.

Molly Crissell
Heritage Consultant

27 August 2024

Office of the Registrar Aboriginal Land Rights Act 1983
PO Box 5068
Parramatta NSW 2124

Schofields-Tallawong High School: Aboriginal Cultural Heritage Assessment — Notification to Agencies

Our Ref: Matter: 40105

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Yours sincerely

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Molly Crissell
Heritage Consultant

27 August 2024

National Native Title Tribunal
GPO Box 9973
Sydney NSW 2001

Schofields-Tallawong High School: Aboriginal Cultural Heritage Assessment — Notification to Agencies

Our Ref: Matter: 40105

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Paul Ortiz
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Yours sincerely



Molly Crissell
Heritage Consultant

27 August 2024

Greater Sydney Local Land Services
PO Box 600
Wyong NSW 2259

Schofields-Tallawong High School: Aboriginal Cultural Heritage Assessment — Notification to Agencies

Our Ref: Matter: 40105

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SINSW
Paul Ortiz
Schoolinfrastructure@det.nsw.edu.au

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Yours sincerely

A handwritten signature in black ink that reads "M Crissell". The signature is written in a cursive, flowing style.

Molly Crissell
Heritage Consultant

27 August 2024

Blacktown City Council
62 Flushcombe Road
Blacktown NSW 2148

Schofields-Tallawong High School: Aboriginal Cultural Heritage Assessment — Notification to Agencies

Our Ref: Matter: 40105

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Phone: 02 4911 4040

ACN: 006 175 097

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Yours sincerely

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Molly Crissell
Heritage Consultant

27 August 2024

Deerubbin Local Aboriginal Land Council
3/291-295 High Street
Penrith NSW 2750

Schofields-Tallawong High School: Aboriginal Cultural Heritage Assessment — Notification to Agencies

Our Ref: Matter: 40105

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 12831860) (the study area), within the City of Blacktown Local Government Area, New South Wales (NSW) (the project). The project is to be assessed as a State Significant Development (SSD) under Part 4.36 of the *Environmental Planning and Assessment Act 1979*.

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The purpose of the Aboriginal community consultation is to provide sufficient information for the assessment of Aboriginal cultural heritage values and to assist the Secretary of the Department of Planning, Housing and Infrastructure in the consideration and determination of the application. The project will be undertaken in accordance with the *National Parks and Wildlife Act 1974*.

As per Section 4.1 of the consultation requirements, Biosis wish to invite Deerubbin Local Aboriginal Land Council to register an interest in the project. Biosis is also seeking to identify Aboriginal people who may have an interest in the study area and hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places in the Schofields-Tallawong area. If you could please provide contact details for any such Aboriginal people or organisations by **5pm 10 September 2024** it would be greatly appreciated.

In accordance with Section 4.1.3 (a) of the consultation requirements, please note that the relevant client contact for this project is:

SINSW
Paul Ortiz
Schoolinfrastructure@det.nsw.edu.au

All correspondence regarding provision of names and contact details of Aboriginal people who may hold cultural knowledge relevant to the study area should be provided in writing by **5pm 10 September 2024** to:

Molly Crissell
Biosis Pty Ltd
Suite 8, 27 Annie St,
Wickham NSW 2293
mcrissell@biosis.com.au

If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

Yours sincerely

A handwritten signature in black ink that reads "M Crissell". The signature is written in a cursive, flowing style.

Molly Crissell
Heritage Consultant

From: [Aboriginal Owners](#)
To: [Molly Crissell](#)
Subject: Reply: 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA
Date: Tuesday, 27 August 2024 3:57:06 PM
Attachments: [image892179.png](#)
[image955753.png](#)
[image097976.png](#)
[image694719.jpg](#)
[image001.png](#)
[PDFMailer.pdf](#)
[20240827_AO_Search_ACHA_Biosis_201_Guntawong_Road_Tallawong_NSW_Deerubbin_LALC.pdf](#)

OFFICIAL

Dear Molly

Please find attached the response from the Office of the Registrar, ALRA to your email and letter of 27 August 2024 regarding the proposed development of a high school at 201 Guntawong Road (Lot 1 DP 1283186) Tallawong NSW, as part of an Aboriginal Cultural Heritage Assessment (ACHA).

Kind regards

The Aboriginal Owners team

Office of the Registrar, Aboriginal Land Rights Act 1983
T (02) 8575 1160 E aboriginalowners@oralra.nsw.gov.au
www.oralra.nsw.gov.au

PO Box 787
PARRAMATTA NSW 2124

Working days Monday to Friday, 9:00 am – 5:00 pm



I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

The Office of the Registrar stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for Elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to supporting the return of land to Aboriginal people as compensation for past dispossession; and to support self-determination through participation and representation in the land council network.

Please consider the environment before printing this email.

OFFICIAL

From: Molly Crissell <MCrissell@biosis.com.au>
Sent: Tuesday, August 27, 2024 1:29 PM
To: Aboriginal Owners <aboriginalowners@oralra.nsw.gov.au>
Subject: 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA

[CAUTION: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.]

Good afternoon,

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales (NSW) (the project). The project is to be assessed as a State Significant Development (SSD) under Part 4.36 of the Environmental Planning and Assessment Act 1979. Biosis is assisting TSA Riley on behalf of SINSW with consultation with the Aboriginal community to inform the ACHA. Consultation with the Aboriginal community for this assessment will be undertaken in accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW 2010) (consultation requirements).

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Biosis Pty Ltd
Suite 8, 27 Annie St,
Wickham NSW 2293
mcrissell@biosis.com.au

Kind regards,

Molly

Molly Crissell She/Her
Heritage Consultant

☐ 0438 390 129
☐ MCrissell@biosis.com.au
☐ www.biosis.com.au



Leaders in Ecology, Heritage and Environmental Approvals

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27 August 2024

Office of the Registrar Aboriginal Land Rights Act 1983
PO Box 5068
Parramatta NSW 2124

Schofields-Tallawong High School: Aboriginal Cultural Heritage Assessment — Notification to Agencies

Our Ref: Matter: 40105

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales (NSW) (the project). The project is to be assessed as a State Significant Development (SSD) under Part 4.36 of the *Environmental Planning and Assessment Act 1979*.

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In accordance with Section 4.1.3 (a) of the consultation requirements, please note that the relevant client contact for this project is:

Biosis Pty Ltd
Newcastle
Suite 8, 27 Annie Street
Wickham NSW 2293

Phone: 02 4911 4040

ACN: 006 175 097

ABN :65 006 175 097

Email: newcastle@biosis.com.au

biosis.com.au



SINSW
Paul Ortiz
Schoolinfrastructure@det.nsw.edu.au

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Wickham NSW 2293
mcrissell@biosis.com.au

If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

Yours sincerely



Molly Crissell
Heritage Consultant



27 August 2024

By email mcrissell@biosis.com.au

Molly Crissell
Biosis Pty Ltd
Suite 8, 27 Annie Street
WICKHAM NSW 2293

Dear Molly

Aboriginal Cultural Heritage Assessment – Proposed development of a high school at 201 Guntawong Road (Lot 1 DP 1283186) Tallawong NSW: request for list of potential Aboriginal stakeholders

We refer to your email and letter to this Office dated 27 August 2024 requesting contact information for Aboriginal organisations, stakeholders and/or people who may have cultural knowledge relevant to the proposed development of a high school at 201 Guntawong Road (Lot 1 DP 1283186) Tallawong NSW, as part of an Aboriginal Cultural Heritage Assessment (ACHA).

Under Section 170 of the *Aboriginal Land Rights Act 1983* (NSW), the Office of the Registrar is required to maintain the Register of Aboriginal Owners (RAO) for New South Wales. A search of the RAO has shown that there are currently no Registered Aboriginal Owners in the project area.

The proposed redevelopment falls within the boundaries of Deerubbin Local Aboriginal Land Council. We suggest you contact Deerubbin Local Aboriginal Land Council (contact details provided below), as they may wish to participate or contribute.

Yours sincerely

Karen Carter
Project Officer
Office of the Registrar, Aboriginal Land Rights Act 1983



From: [Geospatial Search Requests](#)
To: [Molly Crissell](#)
Subject: RE: SR24/1444 - 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA [SEC=OFFICIAL]
Date: Wednesday, 28 August 2024 10:37:09 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.jpg](#)

OFFICIAL

Your ref: Matter no. 40105 Our ref: SR24/1444

Dear Molly Crissell

Thank you for your search request, please find your results below.

Search Results

The results provided are based on the information you supplied and are derived from a search of the following Tribunal databases:

- 0. Schedule of Native Title Determination Applications
- 1. Register of Native Title Claims
- 2. Native Title Determinations
- 3. Indigenous Land Use Agreements (Registered and notified)

Results for overlapping native title matters in NSW:

Feature ID	Tenure	Cadastral Data As At	Feature Area SqKm	Overlapping Native Title Feature				
				NNTT File Number	Name	Category	Overlap Area SqKm	% Selected Feature
1/DP1283186	NSW GOVERNMENT	8/03/2024	0.2912	No overlap			-	0.00%

For more information about the Tribunal's registers or to search the registers yourself and obtain copies of relevant register extracts, please visit our [website](#).

Information on native title claims and freehold land can also be found on the Tribunal's website here: [Native title claims and freehold land](#).

Please note: There may be a delay between a native title determination application being lodged in the Federal Court and its transfer to the Tribunal. As a result, some native title determination applications recently filed with the Federal Court may not appear on the Tribunal's databases.

The search results are based on analysis against external boundaries of applications only. Native title applications commonly contain exclusions clauses which remove areas from within the external boundary. To determine whether the areas described are in fact subject to claim, you need to refer to the "Area covered by claim" section of the relevant Register Extract or Schedule Extract and any maps attached.

Search results and the existence of native title

Please note that the enclosed information from the Register of Native Title Claims and/or the Schedule of Applications is **not** confirmation of the existence of native title in this area. This cannot be confirmed until the Federal Court makes a determination that native title does or does not exist in relation to the area. Such determinations are registered on the National Native Title Register.

The Tribunal accepts no liability for reliance placed on enclosed information

The enclosed information has been provided in good faith. Use of this information is at your sole risk. The National Native Title Tribunal makes no representation, either express or implied, as to the accuracy or suitability of the information enclosed for any particular purpose and accepts no liability for use of the information or reliance placed on it.

If you have any further queries, please do not hesitate to contact us via GeospatialSearch@NNTT.gov.au

Regards,

[Geospatial Searches](#)

National Native Title Tribunal | Perth

Email: GeospatialSearch@nntt.gov.au | www.nntt.gov.au

From: Molly Crissell <MCrissell@biosis.com.au>
Sent: Tuesday, August 27, 2024 11:34 AM
To: Geospatial Search Requests <GeospatialSearch@NNTT.gov.au>
Cc: Enquiries <Enquiries@nntt.gov.au>
Subject: SR24/1444 - FW: 40105 - Stage 1.1 Consultation - Schofields-Tallawong HS ACHA

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Molly Crissell
Biosis Pty Ltd
Suite 8, 27 Annie St,
Wickham NSW 2293
mcrissell@biosis.com.au
Kind regards,
Molly

Molly Crissell She/Her

Heritage Consultant

☐ 0438 390 129
☐ MCrissell@biosis.com.au
☐ www.biosis.com.au



Leaders in Ecology, Heritage and Environmental Approvals

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From: [Barry Gunther](#)
To: [Molly Crissell](#)
Subject: Heritage NSW Aboriginal stakeholder list for Tallawong High School - 201 Guntawong Road, Tallawong – Blacktown.
Date: Thursday, 5 September 2024 2:28:10 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.jpg](#)
[Heritage NSW Aboriginal stakeholder list for Blacktown LGA.docx](#)
[PDFMailer.pdf](#)

Hi Molly,

Please find attached the Heritage NSW Aboriginal stakeholder list for Tallawong High School - 201 Guntawong Road, Tallawong – Blacktown.

regards

Barry Gunther
Aboriginal Senior Assessment Officer
Heritage NSW
Department of Climate Change,
Energy, the Environment and Water

www.environment.nsw.gov.au/topics/heritage

Locked bag 5020
Parramatta NSW 2124

Working days Monday to Friday, 9:00am - 5:00pm

I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.

From: Molly Crissell <MCrissell@biosis.com.au>
Sent: Tuesday, August 27, 2024 1:29 PM
To: OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>
Subject: Stakeholder Request - ACHA - SSD - School Infrastructure - Tallawong High School - 201 Guntawong Road, Tallawong - Blacktown LGA

Good afternoon,

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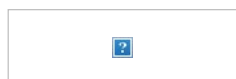
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Wickham NSW 2293
mcrissell@biosis.com.au

Kind regards,
Molly

Molly Crissell She/Her
Heritage Consultant

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Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Office of Environment, Energy and Science.

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27 August 2024

Heritage NSW
PO Box 644
Parramatta NSW 2124

Schofields-Tallawong High School: Aboriginal Cultural Heritage Assessment — Notification to Agencies

Our Ref: Matter: 40105

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Newcastle
Suite 8, 27 Annie Street
Wickham NSW 2293

Phone: 02 4911 4040

ACN: 006 175 097

ABN :65 006 175 097

Email: newcastle@biosis.com.au

biosis.com.au



SINSW
Paul Ortiz
Schoolinfrastructure@det.nsw.edu.au

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Yours sincerely

A handwritten signature in black ink that reads "M Crissell".

Molly Crissell
Heritage Consultant

**LIST OF ABORIGINAL STAKEHOLDERS FOR THE DEPARTMENT OF PLANNING AND ENVIRONMENT (DPE) HELD BY DPE FOR THE PURPOSES OF THE OEH
ABORIGINAL CULTURAL HERITAGE CONSULTATION REQUIREMENTS FOR PROPONENTS 2010**

The purpose of this letter is to assist you as the proposed applicant in undertaking Aboriginal community consultation in accordance with the relevant legislation and guidelines.

The consultation process involves getting the views of, and information from, Aboriginal people and reporting on these. It is not to be confused with other field assessment processes involved in preparing a proposal and an application. Consultation does not include the employment of Aboriginal people to assist in field assessment and/or site monitoring. Aboriginal people may provide services to proponents through a contractual arrangement however, this is separate from consultation. The proponent is not obliged to employ those Aboriginal people registered for consultation. Consultation as per these requirements will continue irrespective of potential or actual employment opportunities for Aboriginal people.

In accordance with Clause 60 (10) of the National Parks and Wildlife Regulation 2019, where an agreement of the kind listed below specifies or identifies a modified or alternative consultation process for the purposes of Part 6 of the National Parks and Wildlife Act 1974, the applicant is to undertake consultation in accordance with the modified or alternative process. The applicable agreements are:

- a) a registered Indigenous Land Use Agreement under the Native Title Act 1993 of the Commonwealth entered into between an Aboriginal community and the State,
- b) a lease entered into under Part 4A of the Act,
- c) an agreement entered into by the Secretary and a board of management reserved under Part 4A of the Act that has the consent of Aboriginal owner board members for the land concerned,
- d) an agreement entered into between an Aboriginal community and the Department of Planning, Industry and the Environment.

Where you believe your application is wholly or partially located within an area subject to any of the above agreements, please provide further correspondence (including mapping, if required) detailing the applicable agreement and its relationship to the application area to heritagemailbox@environment.nsw.gov.au. Heritage NSW will respond with further advice.

Where the above does not apply, please proceed with consultation in accordance with the Clause 60 (1-9) of the National Parks and Wildlife Regulation 2019 and Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (the "Consultation Requirements"). A copy of the Consultation Requirements can be found on the OEH website at: <http://www.environment.nsw.gov.au/resources/cultureheritage/commconsultation/09781ACHconsultreq.pdf>.

Under the Consultation Requirements, a proponent is required to provide Aboriginal people who may hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and/or places as relevant to the proposed project area, with an opportunity to be involved in consultation. Section 3.3.1 of the Consultation Requirements states that Aboriginal people who can provide this information are, based on Aboriginal lore and custom, the traditional owners or custodians of the land that is the subject of the proposed project.

The Consultation Requirements also state that:

Traditional owners or custodians with appropriate cultural heritage knowledge to inform decision making who seek to register their interest as an Aboriginal party are those people who:

- continue to maintain a deep respect for their ancestral belief system, traditional lore and custom

- recognise their responsibilities and obligations to protect and conserve their culture and heritage and care for their traditional lands or Country
- have the trust of their community, knowledge and understanding of their culture, and permission to speak about it.

This list is provided to proponents in accordance with Clause 60(2)(a)(i) of the National Parks and Wildlife Regulation 2019 and section 4.1.2 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.

The stakeholders identified on this list may have an interest in the proposed project area and may hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places.

How to use this list

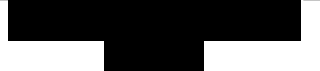

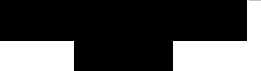



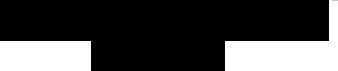


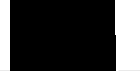




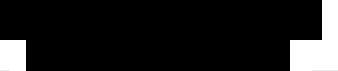

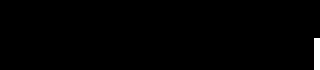

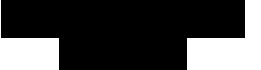



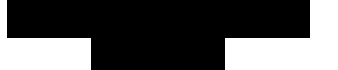











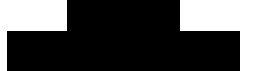

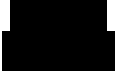

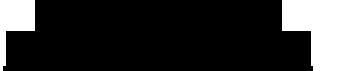
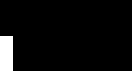
















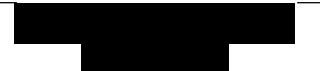























- Contact the organisations/individuals who have indicated an interest in the relevant LGA/s and invite them to register an interest in your project.
- Do not reproduce the attached list in publicly available reports and other documents. Your report should only contain the names of the organisations and individuals who you have invited to register an interest in your project and those who have registered as stakeholders for your project.
- Note that the provision of this Aboriginal stakeholder list does not override a proponent's requirement to also advertise in the local newspaper and to seek from other sources the names of any other Aboriginal people who may hold cultural knowledge as required under clause 60 (2) of the National Parks and Wildlife Regulation 2019.
- Please refer to Clause 60 of the National Parks and Wildlife Regulation 2019 and the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 for further information on the requirements of the consultation process.
- If contact details of stakeholders are found to be incorrect or outdated, please contact heritagemailbox@environment.nsw.gov.au.

Last updated August 2024

Our reference: Doc24/710280

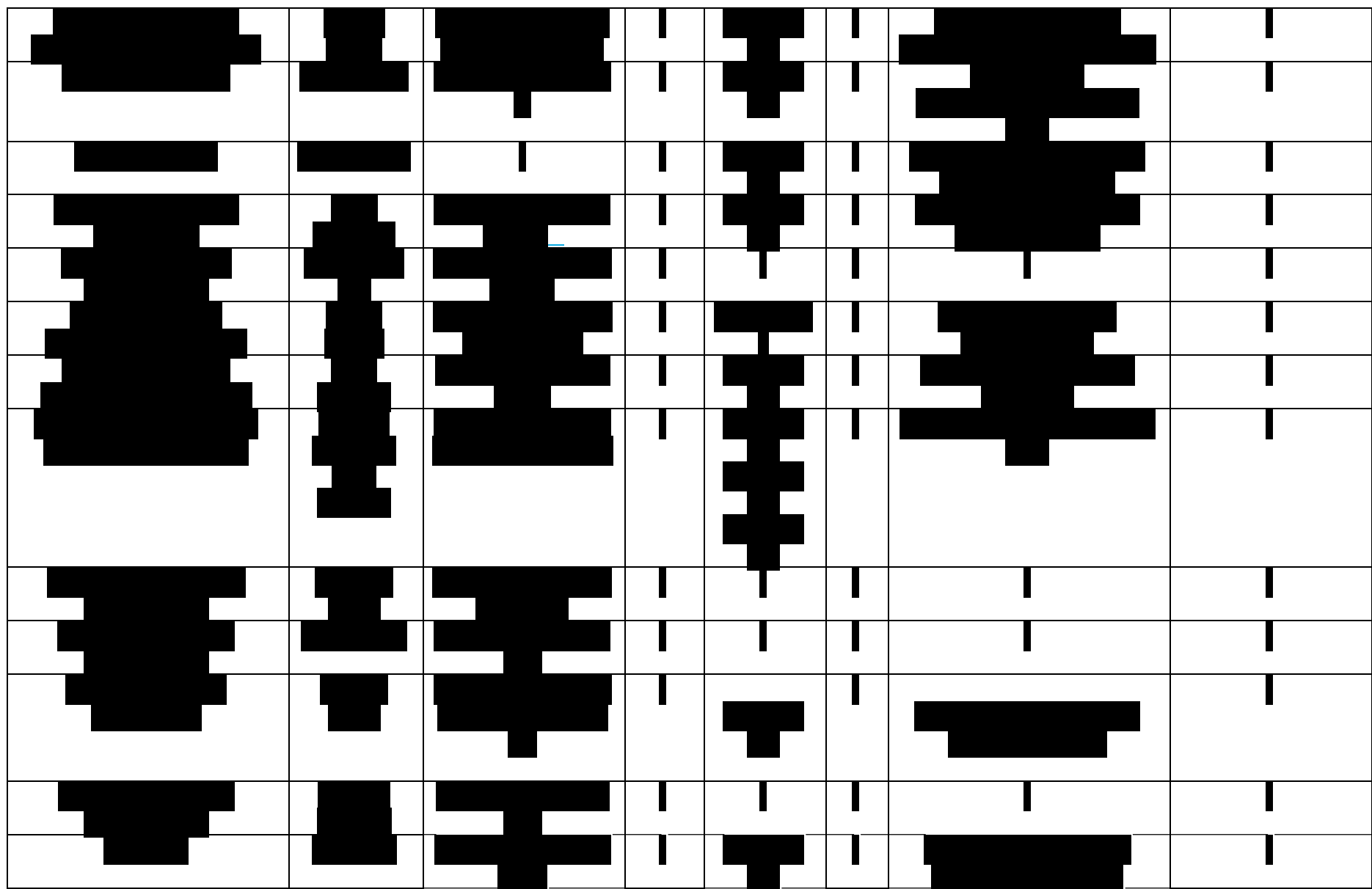
Tallawong High School, 201 Guntawong Road, Tallawong (Lot 1 DP 1283186)

Aboriginal Stakeholders – Blacktown Local Government Area.

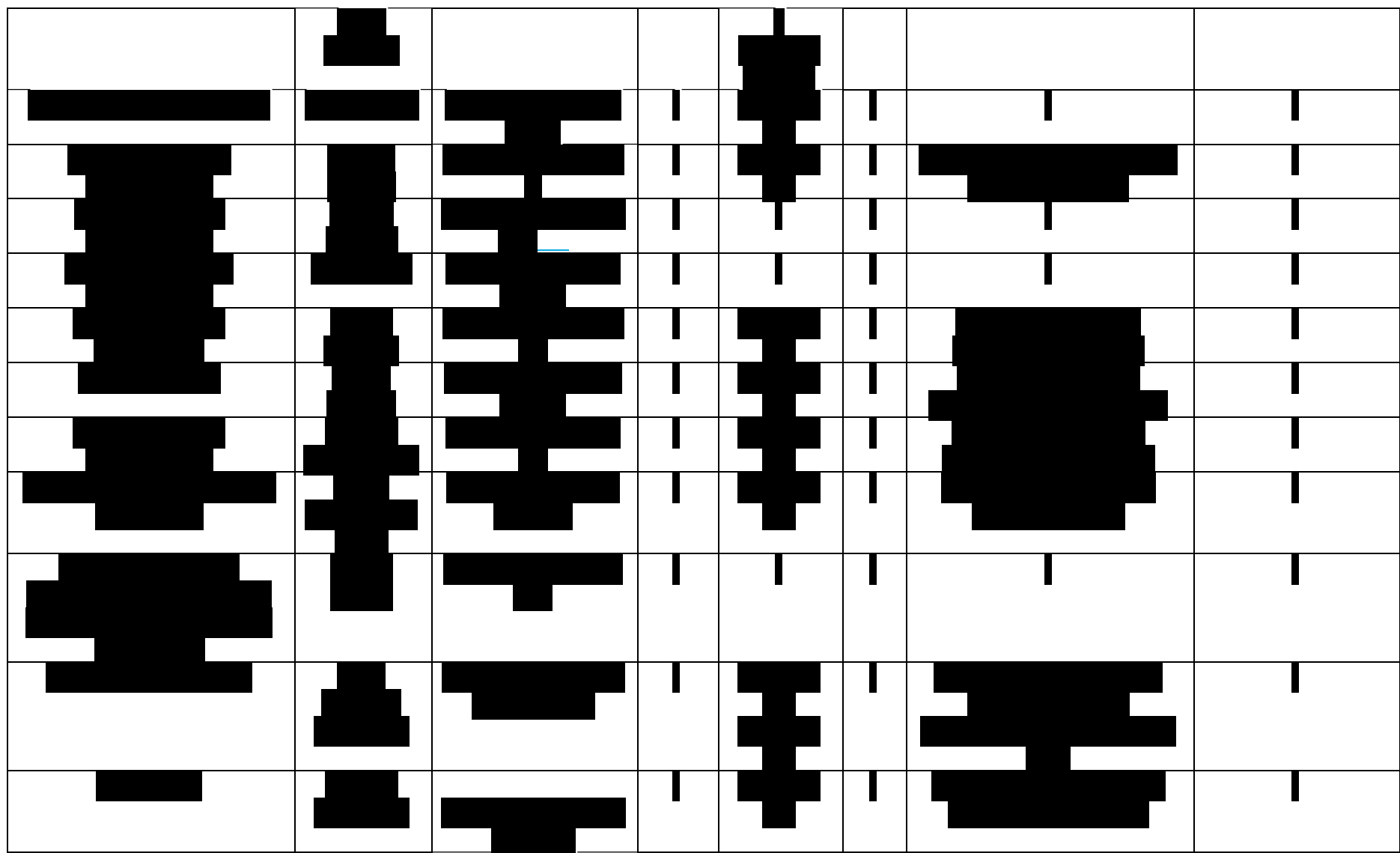
							
							
							
							
							
							
							
							
							
							

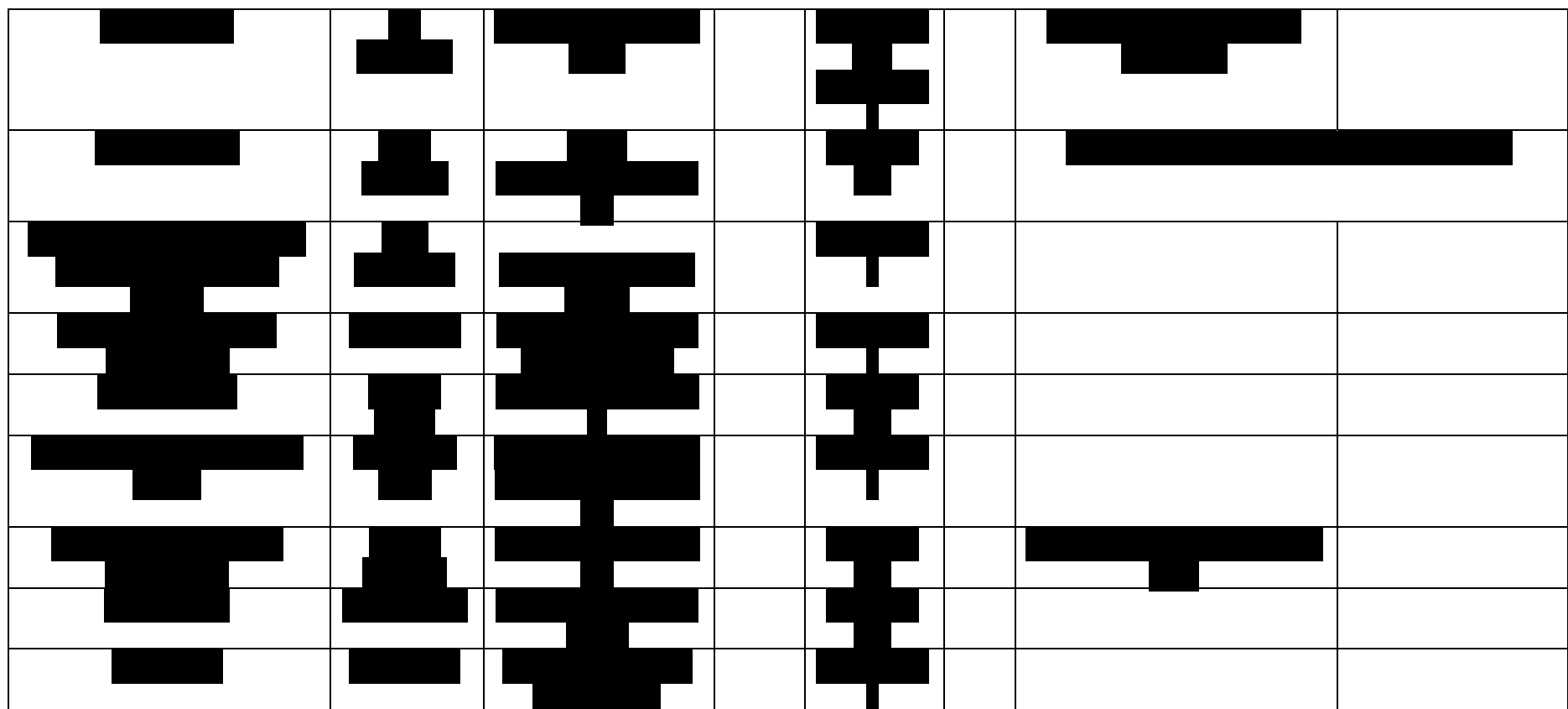










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Notices

Public Notices

NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS

Biosis Pty Ltd (Biosis) is undertaking an Aboriginal Cultural Heritage Assessment and possible test excavations to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186), New South Wales, within the City of Blacktown Local Government Area for School Infrastructure New South Wales (SINSW, Paul Ortiz, SchoolInfrastructure@det.nsw.edu.au).

In accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (DECCW 2010), Biosis invites Aboriginal people who hold cultural knowledge in determining the significance of Aboriginal objects and/or places in the vicinity of the above area to register their interest in a process of community consultation.

The purpose of Aboriginal community consultation is to provide sufficient information for the assessment of Aboriginal cultural heritage values, and to assist the Secretary of the Department of Planning, Housing and Infrastructure in their consideration and determination of the application. The project will be undertaken in accordance with the National Parks and Wildlife Act 1974 and assessed as State Significant Development under Part 4.36 of the Environmental Planning and Assessment Act 1979.

For more information or to register in writing, please contact Molly Crissell at mcrissell@biosis.com.au or 02 4911 4040. Please note that the name of each group that registers for consultation on this project will be provided to Heritage NSW, Department of Climate Change, Energy, the Environment and Water and the Local Aboriginal Land Council unless the group specifies that they do not want their details released. REGISTRATIONS MUST BE RECEIVED BEFORE 5:00PM 27 SEPTEMBER 2024

NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS

Biosis Pty Ltd (Biosis) is undertaking an Aboriginal Cultural Heritage Assessment for School Infrastructure New South Wales (SINSW) to inform the development of a new high school at the corner of Wharf Road and Hope Street, Melrose Park, NSW (Lot 201 DP1265603), within the Paramatta Local Government Area on behalf of Colliers International Group Inc. (SINSW, schoolinfrastructure@det.nsw.edu.au).

The project will be assessed as State Significant Development under Part 4.36 of the Environmental Planning and Assessment Act 1979.

In accordance with the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010, Biosis invites Aboriginal people who hold cultural knowledge in determining the significance of Aboriginal objects and/or places in the vicinity of the above area to register their interest in a process of community consultation.

The purpose of Aboriginal community consultation is to provide sufficient information for the assessment of Aboriginal cultural heritage values, and to assist the Secretary of the Department of Planning, Housing and Infrastructure in their consideration and determination of the application.

For more information or to register in writing, please contact Molly Crissell on m.crissell@biosis.com.au, Suite 8, 27 Annie Street, Wickham NSW 2293, (02) 4911 4040.

Please note that the name of each group that registers for consultation on this project will be provided to Heritage NSW and the Local Aboriginal Land Council unless the group specifies that they do not want their details released. REGISTRATIONS MUST BE RECEIVED BEFORE 5:00PM, 27 September 2024

"NOTICE PURSUANT TO SECTION 12A AND 32(6) OF THE REAL PROPERTY ACT 1900 ('ACT') APPLICATION AU290810 FOR CANCELLATION OF RECORDING OF AN EASEMENT BY FIRE AND RESCUE NSW ('APPLICANT')

The above mentioned Application has been made under Section 32(6) of the Act to cancel the notification 'easement affecting the land shown so burdened in vol 5880 fol 71' ('Easement') on the basis that there is no evidence that the Easement has been formally created. The Easement sought to be cancelled is a prescriptive easement recorded on Folio Identifier B/359735 being the land known as 88 Meehan Street Yass NSW 2582 and is owned by the Applicant. We intend to register the Application and cancel the recording of the Easement from Folio Identifier B/359735 unless, within one (1) month from the date of this notice, you lodge at this Office, an Order of Court from the Supreme Court of NSW preventing the registration of the Application and the removal of the easement. Enquiries: AU290810: MH Leg 6 Email: ldr@nswlrs.com.au Date: 13 September 2024

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Deaths

COZIS, George

Born on 21.01.1934
Passed away peacefully
on 07.09.2024
Beloved husband,
father, grandfather and
great grandfather.
We miss you already mate

Forever in our hearts

Tributes & Condolences



In Loving
Memory of Our
Guardian Angel

Phyllis Tulloh

Mother, wife and nana,
one so loved and
always missed,
but forever present
in our hearts and
prayers, our angel you.

So much love that
we all can feel,
as you shine down
all your love to us
from above,
but to know you
live in our hearts
and how you can
bring happiness
even in sadness,
with just a warming
smile, our angel you.

Forever remembered
never forgotten

Love all the family

Their
memory
lives on



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today.

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Notices

Tenders, Quotes & Contracts

LATEST E-TENDERS



RFT002-2024: Northern
Catchment Drainage
Contact: Melanie Slimming,
Director of Infrastructure and
Engineering Services via the
online forum (see below).
Closing: 01/10/2024 - 4pm AET

Contractors wishing to respond to this tender
Z100 2OG WKH 1X00 GHWDUV LOFXGLOJ FROMDFIV
at the URL below.

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From: [Luci Kumar Sharma](#)
To: [REDACTED]
Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations
Date: Thursday, 12 September 2024 1:07:56 PM
Attachments: [40105.Schofields-Tallawong.HS.Stakeholder.Invitations.DFT02.20240805.pdf](#)

To whom it may concern,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Wales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.

Please see the attached letter for more information. If you wish to register your interest, please provide your contact details in writing via post or email by 5:00PM 26 September 2024 to:

Molly Crissell

Biosis Pty Ltd

Suite 8, 27 Annie Street,

Wickham NSW 2293

Mcrissell@biosis.com.au

If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

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Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations
Date: Thursday, 12 September 2024 1:07:57 PM
Attachments: [40105.Schofields-Tallawong.HS.Stakeholder.Invitations.DFT02.20240805.pdf](#)

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From: [Luci Kumar Sharma](#)
To: [REDACTED]
Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations
Date: Thursday, 12 September 2024 1:07:58 PM
Attachments: [40105.Schofields-Tallawong.HS.Stakeholder.Invitations.DFT02.20240805.pdf](#)

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Date: Thursday, 12 September 2024 1:07:58 PM
Attachments: [40105.Schofields-Tallawong.HS.Stakeholder.Invitations.DFT02.20240805.pdf](#)

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Date: Thursday, 12 September 2024 1:07:59 PM
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From: [Luci Kumar Sharma](#)
To: [REDACTED]
Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations
Date: Thursday, 12 September 2024 1:08:00 PM
Attachments: [40105.Schofields-Tallawong.HS.Stakeholder.Invitations.DFT02.20240805.pdf](#)

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Attachments: [40105.Schofields-Tallawong.HS.Stakeholder.Invitations.DFT02.20240805.pdf](#)

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Mcrissell@biosis.com.au

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Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations
Date: Thursday, 12 September 2024 1:08:06 PM
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To: [REDACTED]
Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations
Date: Thursday, 12 September 2024 1:08:12 PM
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From: [Luci Kumar Sharma](#)
To: [REDACTED]
Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations
Date: Thursday, 12 September 2024 1:08:22 PM
Attachments: [40105.Schofields-Tallawong.HS.Stakeholder.Invitations.DFT02.20240805.pdf](#)

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Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations
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Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations
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Date: Thursday, 12 September 2024 1:07:56 PM
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Thu 2024-09-12 1:08 PM

 1 attachments (120 KB)

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Kind Regards,
Luci

[40105].Schofields-Tallawong.HS.Stakeholder.Invitations

Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Thu 2024-09-12 1:08 PM

 1 attachments (121 KB)

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Kind Regards,

Luci

12 September 2024

Deerubbin Local Aboriginal Land Council
[REDACTED]
[REDACTED]

Dear

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

Our Ref: Matter: 40105

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Carolyn Hickey

A1 Indigenous Services
[REDACTED]
[REDACTED]

Dear Carolyn

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Amanda Hickey

Amanda Hickey Cultural Services
[REDACTED]
[REDACTED]

Dear Amanda

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Jamie Eastwood

Aragung Aboriginal Cultural Heritage Site Assessments
[REDACTED]
[REDACTED]

Dear Jamie

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Ralph Hampton

B.H. Heritage Consultants
[REDACTED]
[REDACTED]

Dear Ralph

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Molly Crissell
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12 September 2024

Nola Hampton

B.H. Heritage Consultants



Dear Nola

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12 September 2024

Karia Lea Bond

Badu (Murrin Clan/Peoples)



Dear Karia Lea

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Molly Crissell
Heritage Consultant

12 September 2024

James Carroll

Bidjawong Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear James

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Simalene Carriage

Bilinga (Murrin Clan/Peoples)

Dear Simalene

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Our Ref: Matter: 40105

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Newcastle

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Jennifer Beale

Butucarbin Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Jennifer

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Clive Freeman

Clive Freeman
[REDACTED]
[REDACTED]

Dear Clive

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Marilyn Carroll-Johnson

Corroboree Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Marilyn

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Corey Smith

Cullendulla (Murrin Clan/Peoples)

Dear Corey

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Paul Hand

Darug Boorooberongal Elders Aboriginal Corporation



Dear Paul

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Justine Coplin

Dharug Custodian Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Justine

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Molly Crissell
Heritage Consultant

12 September 2024

Kevin Cavanagh

Deerubbin Local Aboriginal Land Council

Dear Kevin

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Andrew Bond

Dharug (Murrin Clan/Peoples)

Dear Andrew

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Lilly Carroll

Didge Ngunawal Clan



Dear Lilly

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Molly Crissell
Heritage Consultant

12 September 2024

Darren Duncan

DJMD Consultancy

Dear Darren

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mcrissell@biosis.com.au

Biosis Pty Ltd

Newcastle

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Carol Slater

Gilay Consultants
[REDACTED]
[REDACTED]

Dear Carol

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

Our Ref: Matter: 40105

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Steven Johnson

Ginninderra Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Steven

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

Our Ref: Matter: 40105

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Basil Smith

Goobah Development PTY LTD (Murrin Clan/Peoples)



Dear Basil

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Caine Carroll

Goodradigbee Cultural & Heritage Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Caine

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Molly Crissell
Heritage Consultant

12 September 2024

Wendy Smith

Gulaga

Dear Wendy

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Molly Crissell
Heritage Consultant

12 September 2024

Shayne Dickson

Gunjeewong Cultural Heritage Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Shayne

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Kylie Ann Bell

Gunyyuu (Murrin Clan/Peoples)

Dear Kylie Ann

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Patricia Hampton

HSB Consultants; HSB Heritage Consultants
[REDACTED]
[REDACTED]

Dear Patricia

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Yours sincerely



Molly Crissell
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12 September 2024

Joanna Anne Stewart

Jerringong (Murrin Clan/Peoples)

Dear Joanna Anne

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Julia Narayan

Julia Narayan

Dear Julia

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

Our Ref: Matter: 40105

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Phil Khan

Kamilaroi Yankuntjatjara Working Group
[REDACTED]
[REDACTED]

Dear Phil

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Robert Young

Konanggo Aboriginal Cultural Heritage Services
[REDACTED]
[REDACTED]

Dear Robert

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Korri Currell

Koori Digs Services
[REDACTED]
[REDACTED]

Dear Korri

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Kaya Dawn Bell

Munyunga (Murrin Clan/Peoples)

Dear Kaya Dawn

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

Our Ref: Matter: 40105

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Phillip Carroll

Mura Indigenous Corporation (icn:8991)



Dear Phillip

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Jesse Johnson

Muragadi Heritage Indigenous Corporation
[REDACTED]
[REDACTED]

Dear Jesse

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Darleen & Ryan Johnson

Murra Bidgee Mullangari Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Darleen & Ryan

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Roxanne Smith

Murramarang (Murrin Clan/Peoples)

Dear Roxanne

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Molly Crissell
Heritage Consultant

12 September 2024

Mark Henry

Murrumbul (Murrin Clan/Peoples)

Dear Mark

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Kaarina Slater

Ngambaa Cultural Connections
[REDACTED]
[REDACTED]

Dear Kaarina

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

Our Ref: Matter: 40105

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Biosis Pty Ltd
Newcastle

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Newton Carriage

Nundagurri (Murrin Clan/Peoples)

Dear Newton

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Pemulwuy Johnson

Pemulwuy (Murrin Clan/Peoples)



Dear Pemulwuy

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Shane Carriage

Thauaira

Dear Shane

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Molly Crissell
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12 September 2024

Thomas Dalstrom

Thomas Dahlstrom Offers ACH value by using 3D Laser and Drone technology

Dear Thomas

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Yours sincerely



Molly Crissell
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12 September 2024

John Carriage

Thoorga Nura
[REDACTED]
[REDACTED]

Dear John

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Heritage Consultant

12 September 2024

Rodney & Barry Gunther

Waawaar Awaa Aboriginal Corporation

Dear Rodney & Barry

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Molly Crissell
Heritage Consultant

12 September 2024

Philip Boney

Wailwan Aboriginal Group

Dear Philip

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Molly Crissell
Heritage Consultant

12 September 2024

Ronald Stewart

Walgalu (Murrin Clan/Peoples)

Dear Ronald

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Hayley Bell

Wingikara (Murrin Clan/Peoples)

Dear Hayley

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Steven Johnson

Woka Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Steven

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

Our Ref: Matter: 40105

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Daniel Chalker

Wori Woilywa

Dear Daniel

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Lee-Roy James Boota

Wullung (Murrin Clan/Peoples)



Dear Lee-Roy

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Kerrie & Vicky Slater

Wurrumay Culture Heritage Consultants
[REDACTED]
[REDACTED]

Dear Kerrie & Vicky

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Robert Parson

Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation

Dear Robert

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Arika Jalomaki

Yulay Cultural Services
[REDACTED]
[REDACTED]

Dear Arika

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Molly Crissell
Heritage Consultant

12 September 2024

Bo Field

Yurrandaali



Dear Bo

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Molly Crissell
Heritage Consultant

12 September 2024

Kaylene Terry

Bariyan Cultural Connections

Dear Kaylene

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Kelvin Boney

Wallanbah Aboriginal Site Conveyancing

Dear Kelvin

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Raymond Weatherall

RAW Cultural Healing
[REDACTED]
[REDACTED]

Dear Raymond

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Gary Dunn

Dharramalin
[REDACTED]
[REDACTED]

Dear Gary

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Ethan Trewlynn

Long Gully Cultural Services
[REDACTED]
[REDACTED]

Dear Ethan

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

Our Ref: Matter: 40105

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Trystan Treloar

Guthers Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Trystan

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Colin Walker

Gadu chts

Dear Colin

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Pearl Depoma

Pearl Depoma
[REDACTED]
[REDACTED]

Dear Pearl

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Alan Medhurst

Nattai Aboriginal Culture & Heritage Consultation Service

Dear Alan

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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12 September 2024

Tiarna Bird

Mura Gadi Aboriginal Corporation

Dear Tiarna

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Molly Crissell
Heritage Consultant

12 September 2024

Debbie Moon

Debbie Moon

Dear Debbie

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Thelmerie Rudd

Darug Aboriginal Resource Centre

Dear Thelmerie

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Joanne Timbery

Wallangang Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Joanne

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Molly Crissell
Heritage Consultant

12 September 2024

Ross Tangye

Ross Tangye

Dear Ross

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Paul Webb

Paul Webb

Dear Paul

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

Our Ref: Matter: 40105

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Jody Kulakowski

Barking Owl Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Jody

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Dean Carroll

Black Duck Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Dean

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Wendy Morgan

Guntawang Aboriginal Corporation
[REDACTED]
[REDACTED]

Dear Wendy

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Dean Delponte

Mundawari Heritage Consultants
[REDACTED]
[REDACTED]

Dear Dean

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

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Yours sincerely



Molly Crissell
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12 September 2024

Paul Gale

Paul Gale
[REDACTED]
[REDACTED]

Dear Paul

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Molly Crissell
Heritage Consultant

12 September 2024

Jason Mitchell

Thawun Aboriginal Consultancy
[REDACTED]
[REDACTED]

Dear Jason

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Molly Crissell
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12 September 2024

Jason Mitchell

Thawun Aboriginal Consultancy
[REDACTED]
[REDACTED]

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Molly Crissell
Heritage Consultant

12 September 2024

Dean & Merekai Bell

Yurwang Gundana Consultancy Cultural Heritage Services.
[REDACTED]
[REDACTED]

Dear Dean & Merekai

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Please note that as per Section 4.1.5 of the consultation requirements, the contact details of all registered Aboriginal parties for this project will be forwarded through to Heritage NSW, Department of Climate Change, Energy, the Environment and Water and Deerubbin Local Aboriginal Land Council (LALC). If you do not want your details forwarded on to the Heritage NSW and Deerubbin LALC please notify Biosis at the time of your registration.

If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Helen Slater

Gali Heritage Consultants
[REDACTED]
[REDACTED]

Dear Helen

Schofields-Tallawong High School: Invitation to Register for Aboriginal Community Consultation

Our Ref: Matter: 40105

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales (NSW) (the project). The project is to be assessed as a State Significant Development (SSD) under Part 4.36 of the *Environmental Planning and Assessment Act 1979*.

Biosis is assisting TSA Riley on behalf of SINSW with consultation with the Aboriginal community to inform the ACHA. Consultation with the Aboriginal community for this assessment will be undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010) (consultation requirements).

The purpose of the Aboriginal community consultation is to provide sufficient information for the assessment of Aboriginal cultural heritage values and to assist the Secretary of Department of Planning, Housing and Infrastructure in the consideration and determination of the application. The project will be undertaken in accordance with the *National Parks and Wildlife Act 1974*.

On behalf of SINSW, Biosis therefore invites Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s)/and or Places in the vicinity of the study area, to register their interest in the project outlined above.

If you wish to register your interest, please provide your contact details in writing via post or email by 5pm 26 September 2024 to:

Molly Crissell
Biosis Pty Ltd
Suite 8, 27 Annie St,
Wickham NSW 2293
mcrissell@biosis.com.au

Biosis Pty Ltd

Newcastle

Suite 8, 27 Annie Street
Wickham NSW 2293

Phone: 02 4911 4040

ACN: 006 175 097

ABN :65 006 175 097

Email: newcastle@biosis.com.au

biosis.com.au



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

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SINSW
Paul Ortiz
Schoolinfrastructure@det.nsw.edu.au

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Heritage Consultant

12 September 2024

Bill Trewlynn

Bill Trewlynn
[REDACTED]
[REDACTED]

Dear Bill

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Yours sincerely



Molly Crissell
Heritage Consultant

12 September 2024

Aaron Broad

Minnamunnung
[REDACTED]
[REDACTED]

Dear Aaron

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Our Ref: Matter: 40105

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Molly Crissell
Heritage Consultant

Molly Crissell

From: Molly Crissell
Sent: Thursday, 10 October 2024 2:44 PM
To: [REDACTED]
Subject: 40105 - Schofields-Tallawong HS ACHA - Stage 1.2 - Invitation to Register
Attachments: PDFMailer.pdf

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If you have any queries regarding the project, please don't hesitate to contact me.

Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

lilly carroll <[REDACTED]>

Thu 2024-09-12 2:59 PM

To: Luci Kumar Sharma <lkumarsharma@biosis.com.au>; Molly Crissell <MCrissell@biosis.com.au>

Hi Luci

DNC would like to register an interest into Schofield Tallawong high school

Kind Regards

Paul Boyd & Lilly Carroll

Directors DNC
[REDACTED]

On Thursday, September 12, 2024, 1:08 PM, Luci Kumar Sharma <lkumarsharma@biosis.com.au> wrote:

To whom it may concern,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Wales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.

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Kind Regards,

Luci

Luci Kumar Sharma She/Her
Graduate Heritage Consultant

📞 0499 939 830

✉️ lkumarsharma@biosis.com.au

🌐 www.biosis.com.au



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RE: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

Wendy Morgan <[REDACTED]>

Thu 2024-09-12 3:01 PM

To: Luci Kumar Sharma <lkumarsharma@biosis.com.au>; Molly Crissell <MCrissell@biosis.com.au>; schoolinfrastructure@det.nsw.edu.au
<schoolinfrastructure@det.nsw.edu.au>

📎 2 attachments (2 MB)

Public liability insurance 24-25.pdf; workcover insurance 24-25.pdf;

Hi Luci, Molly and Paul,

Guntawang Aboriginal Resources Inc (GARI) would like to express an interest in the ACHA for TSA Riley on behalf School Infrastructure New south Wales to inform the development of a high school at 201 Guntawang Road Tallawong (lot 1 DP 1283186 within the city of Blacktown Local Government Area NSW.

Guntawang has an experience cultural and heritage officer who has worked with Sydney University to identify the differences between Indigenous Australian' s bone structure to Non- Indigenous People. He has participated and co-ordinated a repatriation of Aboriginal skeletal remains to the land from which she belonged. He has years of experience in identifying Aboriginal artefacts. He has worked with numerous Archaeologist on similar projects.

Guntawang would like to be included in any field work or excavation involved with this project.

Guntawang's rates are \$110.00 per hour.

Please see attached insurances on behalf of Guntawang.

We look forward to working with you.

Kind regards

Wendy Morgan
CEO GARI
[REDACTED]

From: Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Sent: Thursday, 12 September 2024 1:08 PM

To: [REDACTED]

Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

To whom it may concern,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawang Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.

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Molly Crissell
Biosis Pty Ltd
Suite 8, 27 Annie Street,
Wickham NSW 2293
Mcrissell@biosis.com.au

If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

Kind Regards,
Luci

Luci Kumar Sharma She/Her
Graduate Heritage Consultant

☎ 0499 939 830

✉ lkumarsharma@biosis.com.au

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Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

Carolyn .H [REDACTED]

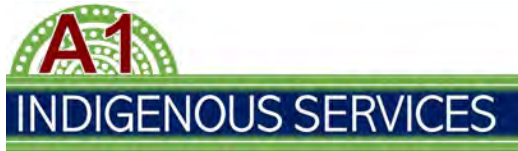
Thu 2024-09-12 1:28 PM

To: Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Cc: Molly Crissell <MCrissell@biosis.com.au>

📎 2 attachments (95 KB)

A1.WC.2025.pdf; A1.PL.2025.pdf;



Contact: Carolyn Hickey

Mobile: 0411650057

Hi,

Thank you for your email, I would like to register in being involved in all levels of consultation for this project. Including, Meetings, Reports, Sharing Cultural Information, and available Field Work.

About Carolyn Hickey

I am a traditional owner with over 25 years experience in helping preserve Aboriginal cultural heritage on projects. I hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and values that exist in the project area.

I have attached A1 Indigenous Services Insurances.

A1 INDIGENOUS SERVICES, Represents over 100 Indigenous Locals

When Selecting Groups for Engagement;

Please consider that **A1 INDIGENOUS SERVICES** is a member of the **NSW INDIGENOUS CHAMBER OF COMMERCE**.

We carry the NSWICC Assured logo showing that **A1 Indigenous Services** has met National Policy requirements as upheld by the First Australians Chamber of Commerce and Industry (FACCI) for being identified as a **100% First Nations Owned Indigenous Business** That has demonstrate compliance with Government and Industry Regulators.

I agree to my details being supplied to OEH and the LALC

Please feel free to contact me on details supplied

Kind Regards,
Carolyn Hickey

A1 INDIGENOUS SERVICES is now a member of the NSW INDIGENOUS CHAMBER OF COMMERCE

A business or enterprise carrying the NSWICC Assured logo has met National Policy requirements as upheld by the First Australians Chamber of Commerce and Industry (FACCI) for being identified as a First Nations Business Owner or Entrepreneur and the business must demonstrate compliance with Government and Industry Regulators.

(Certificate attached) A certificate confirms that the Enterprise listed above has met all requirements of the NSWICC's Assured Program , operating as a 100% Aboriginal Owned, Operated and Controlled Business. The NSW Indigenous Chamber of Commerce (NSWICC) is the Peak body for Aboriginal Business in New South Wales and a member of the First Australians Chamber of Commerce and Industry (FACCI)

A1 Indigenous Services is 100%, Indigenous Owned Australian Company
which offers a range of services to the construction industry.

It is our mission to commit to an innovative approach to a better future for Indigenous employment and community.
While improving ways to close the gap in Aboriginal participation in the construction Industry.
Building strength in aboriginal communities and our Indigenous labour force.



From: Luci Kumar Sharma <lkumarsharma@biosis.com.au>
Sent: Thursday, 12 September 2024 1:07 PM
To: [REDACTED]
Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

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Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

Phillip Boney

Thu 2024-09-12 9:48 PM

To: Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Hey Molly Phil Boney here thank you for your email regarding this project I would like to register my interest

In this project please

Thank you

Regards Phil Boney

Wailwan Aboriginal Group

Sent from my iPhone

On 12 Sep 2024, at 1:09 PM, Luci Kumar Sharma <lkumarsharma@biosis.com.au> wrote:

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<40105.Schofields-Tallawong.HS.Stakeholder.Invitations.DFT02.20240805.pdf>

Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

Fri 2024-09-13 10:07 AM

To: Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Warami Luci

Please Register Dharug Custodian Aboriginal Corporation For this project, this area is where I was raised.
Could you send a map with the boundry of the project site.

Yanu

Justine

----- Original Message -----

From:

"Luci Kumar Sharma" <lkumarsharma@biosis.com.au>

To:

"justinecoplin@optusnet.com.au" <justinecoplin@optusnet.com.au>

Cc:

Sent:

Thu, 12 Sep 2024 03:08:01 +0000

Subject:

[40105].Schofields-Tallawong.HS.Stakeholder.Invitations

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Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

Fri 2024-09-13 9:08 AM

To: Luci Kumar Sharma <lkumarsharma@biosis.com.au>
Cc: Molly Crissell <MCrissell@biosis.com.au>

Hi Luci,

Please register MHC's interest for consultation and our involvement in any related fieldwork for the Aboriginal Cultural Heritage Assessment of 201 Guntawong Road, Tallawong.

Kind regards

Dean Delponte

On Thu, 12 Sept 2024 at 13:10, Luci Kumar Sharma <lkumarsharma@biosis.com.au> wrote:

To whom it may concern,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.

Please see the attached letter for more information. If you wish to register your interest, please provide your contact details in writing via post or email by 5:00PM 26 September 2024 to:

Molly Crissell

Biosis Pty Ltd

Suite 8, 27 Annie Street,

Wickham NSW 2293

Mcrissell@biosis.com.au

If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

Kind Regards,

Luci

Luci Kumar Sharma She/Her
Graduate Heritage Consultant

☎ 0499 939 830

✉ lkumarsharma@biosis.com.au

🌐 www.biosis.com.au



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Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

Fri 2024-09-13 5:42 AM

To: Luci Kumar Sharma <lkumarsharma@biosis.com.au>; Molly Crissell <MCrissell@biosis.com.au>

Good morning Luci and Molly,

Yulay cultural service's would like to register our interest in this project.

Kind regards,

Arika Jalomaki

On Thu, 12 Sep 2024 at 1:09 pm, Luci Kumar Sharma <lkumarsharma@biosis.com.au> wrote:

To whom it may concern,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at [201 Guntawong Road, Tallawong \(Lot 1](#) DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.

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Mcrissell@biosis.com.au

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Kind Regards,

Luci

Luci Kumar Sharma_{She/Her}

Graduate Heritage Consultant

0499 939 830

lkumarsharma@biosis.com.au

www.biosis.com.au



biosis®

APEM Group

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Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

[REDACTED]
Fri 2024-09-13 9:20 AM

To: Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Good Morning Luci,

Please register my interest for this upcoming project in Tallawong.

Thank you.

Regards

Pearl Depoma
[REDACTED]

Lives & Works on Dharug Country

Proud Kamilaroi and Torres Strait Islander Women.

I acknowledge the traditional custodians of country and recognise their continuing connection to land, waters, and community on which I am grateful to live, work and visit. I pay my respects to them, their cultures, and traditions. I honor our Elders both past and present and encourage our future generations to strive.

It always was and always will be, Aboriginal land. Our Ancestors live on, within us.

The content of this email and its attachments are confidential and intended solely for the use of the individual or entity to which they are addressed. If this email is not for you, please advise and delete as soon as possible. Thank you.

Please consider the environment before printing this email.

On 12 Sept 2024 1:08 pm, Luci Kumar Sharma <lkumarsharma@biosis.com.au> wrote:

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Kind Regards,

Luci

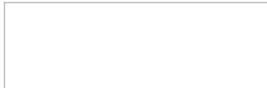
Luci Kumar Sharma She/Her

Graduate Heritage Consultant

☐ 0499 939 830

☐ lkumarsharma@biosis.com.au

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Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

Date Mon 2024-09-16 11:00 PM

To Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Good evening,

On behalf of Butucarbin, I would like to register for this project.

Kind regards,
Jenny

On Thu, Sep 12, 2024 at 1:08PM Luci Kumar Sharma <lkumarsharma@biosis.com.au> wrote:

To whom it may concern,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.

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Mcrissell@biosis.com.au

If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

Kind Regards,

Luci

Luci Kumar Sharma She/Her
Graduate Heritage Consultant

0499 939 830

lkumarsharma@biosis.com.au

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--

Lowanna Gibson
Project Manager for Butucarbin Cultural Heritage
B.A Archaeology/Anthropology USYD
Juris Doctor UTS

Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

Date Mon 2024-09-16 9:48 PM

To Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Hi Lucy

I hope you have been doing well. Thank you for your email regarding registration.

I would like to register as a RAP. I do so on the grounds of my knowledge for Aboriginal objects in NSW and other jurisdictions in Australia; including lithic, dendro and ceremonial objects to name a few.

Look forward to receiving the methodology.

Kind regards

Thomas Dahlstrom

On 12 Sep 2024, at 1:09 pm, Luci Kumar Sharma <lkumarsharma@biosis.com.au> wrote:

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If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

Kind Regards,

Luci

Luci Kumar Sharma She/Her

Graduate Heritage Consultant

0499 939 830

lkumarsharma@biosis.com.au

www.biosis.com.au

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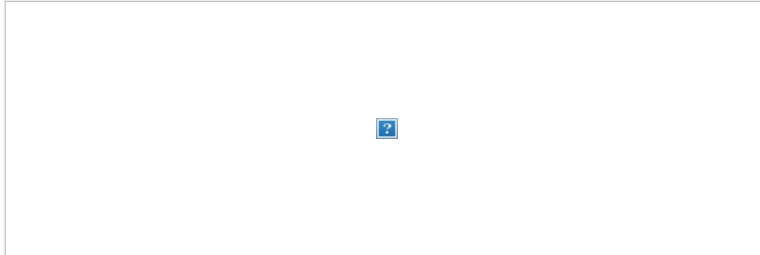
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<40105.Schofields-Tallawong.HS.Stakeholder.Invitations.DFT02.20240805.pdf>

From: [Luci Kumar Sharma](#)
To: [Charlotte Allen](#)
Subject: Fw:
Date: Tuesday, 10 December 2024 3:07:05 PM
Attachments: [Nangamay Nourra & Schofields Tallawong HS.jpg](#)
[image663015.png](#)
[image623216.png](#)
[image665841.png](#)
[image639197.png](#)

Luci Kumar Sharma She/Her
Graduate Heritage Consultant

☐ 0499 939 830
☐ lkumarsharma@biosis.com.au
☐ www.biosis.com.au



Artwork by Shelby Kschenka. Click on the banner to find out more about this piece.

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From: [REDACTED]
Sent: 16 September 2024 1:34 PM
To: Luci Kumar Sharma <lkumarsharma@biosis.com.au>
Cc: Steven.Ross@blacktown.nsw.gov.au <Steven.Ross@blacktown.nsw.gov.au>; mulgokiwi@bigpond.com <mulgokiwi@bigpond.com>
Subject:

Warami

This area is in the area of an AP application, Reference No: DOC23/1028074 , I have attached the AP boundary.

Please call if you have any questions

Yanu

Justine

Email sent using Optus Webmail

RE: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

From [REDACTED]
Date Wed 2024-09-18 9:06 AM
To Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Hi Luci,

Thank you for informing us that **Biosis** will be involved in an Aboriginal Cultural Heritage Assessment at **201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales** & that you are inviting Aboriginal organisations to register, if they wish too be involved in the community consultation process.

As a senior Aboriginal person for the past 51yrs, I actively participate in the protection of the Aboriginal Cultural Heritage throughout the Sydney Basin, & particularly throughout Western Sydney, on behalf of Kamilaroi-Yankuntjatjara Working Group I wish to provide to you my organisation's registration of interest.

I wish to be involved & participate in all levels of consultation/project involvement. I wish to attend all meetings, participate in available field work & receive a copy of the report.

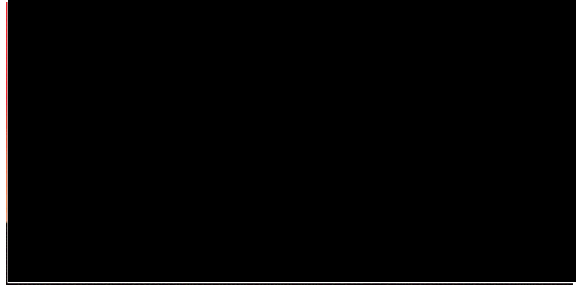
I have attached a copy of Kamilaroi-Yankuntjatjara Working group's Public Liability Insurance & Workers Compensation certificate. Our RAPS have up to 16yrs Cultural Heritage experience in - field work which involves manual excavation (digging), sieving, identifying artefacts, setting up transits, setting up equipment, packing equipment, site surveys & attending meetings (Focus groups, CwC, interpretation).

Should you wish me to provide further information, please do not hesitate to contact me or Stefeanie on 0451068480

Kind Regards
Phil Khan - Director



ABN 26 637 314 384



From: Luci Kumar Sharma <lkumarsharma@biosis.com.au>
Sent: Thursday, September 12, 2024 1:08:08 PM
To: [REDACTED]
Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

To whom it may concern,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.

Please see the attached letter for more information. If you wish to register your interest, please provide your contact details in writing via post or email by 5:00PM 26 September 2024 to:

Molly Crissell
Biosis Pty Ltd
Suite 8, 27 Annie Street,
Wickham NSW 2293
Mcrissell@biosis.com.au

If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

Kind Regards,
Luci

Luci Kumar Sharma She/Her
Graduate Heritage Consultant

☎ 0499 939 830
✉ lkumarsharma@biosis.com.au
🌐 www.biosis.com.au



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RE: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

From [REDACTED]
Date Wed 2024-09-18 8:00 PM
To Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Hi lovely

Hope you are well 😊

Please register GAC for the above mentioned project, we would like to be involved in all stages of the consultation process.

Kind regards,

Krystle Carroll Elliott
Ginninderra Aboriginal Corporation
E [REDACTED]

🇺🇦 We acknowledge the Traditional Owners of Country throughout Australia and recognise their connection to land, water, and community. We pay our respects to them, their cultures, and to Elders past and present.

From: [Luci Kumar Sharma](#)
Sent: Thursday, 12 September 2024 1:08 PM
To: [REDACTED]
Subject: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

To whom it may concern,

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Kind Regards,
Luci

Luci Kumar Sharma She/Her
Graduate Heritage Consultant

- ☐ [0499 939 830](tel:0499939830)
- ☐ lkumarsharma@biosis.com.au
- ☐ www.biosis.com.au



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Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

From [REDACTED]
Date Mon 2024-09-23 3:11 PM
To Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Hi Luci
Please register our company for the above project
Kind regards
Jesse Johnson
[REDACTED]

On 12 Sep 2024, at 1:09 PM, Luci Kumar Sharma <lkumarsharma@biosis.com.au> wrote:

To whom it may concern,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.

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Kind Regards,
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<40105.Schofields-Tallawong.HS.Stakeholder.Invitations.DFT02.20240805.pdf>

Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

From

Date Tue 2024-09-24 9:20 AM

To Luci Kumar Sharma <lkumarsharma@biosis.com.au>

1 attachments (589 bytes)

image887952.png;

On behalf of ngambaa cultural connections I would like to register my expression of interest for Tallawong project

On Thu, 12 Sept 2024, 1:09 pm Luci Kumar Sharma, <lkumarsharma@biosis.com.au> wrote:

To whom it may concern,

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Kind Regards,

Luci

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Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

From [REDACTED]
Date Fri 2024-09-27 7:05 AM
To Luci Kumar Sharma <lkumarsharma@biosis.com.au>

Good Morning Luci

Wurrumay Pty Ltd would like to register for the above project.
Current Insurances
Darug Custodian.

Regards

On 12 Sept 2024 1:08 pm, Luci Kumar Sharma <lkumarsharma@biosis.com.au> wrote:

To whom it may concern,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.

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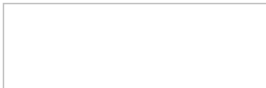
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Kind Regards,
Luci

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From: [Luci Kumar Sharma](#)
To: [Molly Crissell](#)
Subject: Fw: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations
Date: Monday, 14 October 2024 9:46:13 AM
Attachments: [Vicky Slater - _Resume Culture & Heritage Works - October 2024 -Amended NEW.pdf](#)
[image459163.png](#)
[image549776.png](#)
[image445327.png](#)
[image471288.jpg](#)

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From: [REDACTED]
Sent: 14 October 2024 8:20 AM
To: Luci Kumar Sharma <lkumarsharma@biosis.com.au>
Subject: Re: [40105].Schofields-Tallawong.HS.Stakeholder.Invitations

Good Morning Luci

Hope your well.

Wurrumay Culture Heritage Consultants,
Would like to register an interest for the above project.

Current Insurances

Attached my work history.

Have a lovely week.

Vicky

On 12 Sept 2024 1:08 pm, Luci Kumar Sharma <lkumarsharma@biosis.com.au> wrote:
To whom it may concern,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.
Please see the attached letter for more information. If you wish to register your interest, please provide your contact details in writing via post or email by 5:00PM 26 September 2024 to:
Molly Crissell
Biosis Pty Ltd
Suite 8, 27 Annie Street,
Wickham NSW 2293
Mcrissell@biosis.com.au
If you have any queries regarding the project, please don't hesitate to contact Molly on the details above, or alternatively the main office number on (02) 4911 4040.

Kind Regards,
Luci
Luci Kumar Sharma She/Her
Graduate Heritage Consultant

☐ 0499 939 830
☐ lkumarsharma@biosis.com.au
☐ www.biosis.com.au



Leaders in Ecology, Heritage and Environmental Approvals

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

From: [REDACTED]
Sent: Tuesday, 15 October 2024 9:22 PM
To: Molly Crissell
Subject: RE: 40105 - Schofields-Tallawong HS ACHA - Stage 1.2 - Invitation to Register

Follow Up Flag: Follow up
Flag Status: Completed

Hi Molly

Thank you for the email. I would formally like to register for the Aboriginal consultation re the Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales for Tallawong.

Details are
[REDACTED]

Kind regards

Julie

Sent from my Galaxy

----- Original message -----

From: Molly Crissell <MCrissell@biosis.com.au>
Date: 10/10/24 2:44 pm (GMT+10:00)
To: [REDACTED]
Subject: 40105 - Schofields-Tallawong HS ACHA - Stage 1.2 - Invitation to Register

Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf School Infrastructure New South Sales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area, New South Wales.

Please see the attached letter for more information. If you wish to register your interest, please provide your contact details in writing via post or email by 5:00PM 24 October 2024 to:

Molly Crissell
Biosis Pty Ltd
Suite 8, 27 Annie Street,
Wickham NSW 2293
Mcrissell@biosis.com.au

If you have any queries regarding the project, please don't hesitate to contact me.

Molly Crissell She/Her
Heritage Consultant

☐ 0438 390 129
☐ MCrissell@biosis.com.au

 www.biosis.com.au



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

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Appendix 3 Stage 2: Presentation of information about the proposed project and Stage 3: Gathering information about cultural significance

Bronte Baonza

From: Bronte Baonza
Sent: Thursday, 31 October 2024 3:41 PM
Subject: 40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW
Attachments: 40105.Tallawong.Stage.2.3.DFT03.20241031.pdf

Good afternoon,

Thank you for registering your interest in the Schofields-Tallawong Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf of School Infrastructure New South Wales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (part of Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area (LGA), New South Wales (NSW) (the project). The project is to be assessed as a Review of Environmental Factors under Part 5 of the *Environmental Planning and Assessment Act 1979*.

It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by 5:00PM 28 November 2024 either by email, phone or return mail.

Please address feedback to:

Bronte Baonza
Biosis Pty Ltd
Unit 14 17-27 Power Avenue,
Alexandria, NSW 2015
bbaonza@biosis.com.au

Please do not hesitate to contact me if you require additional information or have any queries about the methodology or information provided.

Yours sincerely

From: [Molly Crissell](#)

Bcc:

Subject: 40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201
Guntawong Road, Tallawong NSW - One week remaining.

Date: Thursday, 21 November 2024 11:07:00 AM

Good morning,

Just a quick reminder that the period for comment on Stage 2/3 of community consultation closes in one week for the Schofields-Tallawong Project. It would be appreciated if you would provide feedback on the project information and methodology by 5:00PM 28 November 2024.

Kind regards,
Molly

31 October 2024

To whom it may concern,

Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW
Our Ref: 40105

Thank you for registering your interest in the Schofields-Tallawong Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf of School Infrastructure New South Wales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (part of Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area (LGA), New South Wales (NSW) (the project). The project is to be assessed as a Review of Environmental Factors under Part 5 of the *Environmental Planning and Assessment Act 1979*.

The purpose of the ACHA is to determine the impacts the proposed development will have on any Aboriginal heritage values present within the study area. The ACHA will also assist TSA Riley in developing their plans in order to minimise the impacts the works will have on Aboriginal heritage values. The ACHA will support an Aboriginal Heritage Impact Permit (AHIP).

The following project information and assessment methodology has been provided in accordance with Section 4.2 and Section 4.3 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) (consultation requirements). The aim of this letter is to provide you with information about the project, and the proposed ACHA process and to seek your feedback to inform the ACHA.

It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by 5:00PM 28 November 2024 either by email, phone or return mail.

Please address feedback to:

Bronte Baonza
Biosis Pty Ltd
Unit 14 17-27 Power Avenue,
Alexandria, NSW 2015
bbaonza@biosis.com.au

Please do not hesitate to contact me if you require additional information or have any queries about the methodology or information provided.

Yours sincerely



Bronte Baonza
Heritage Consultant

Stage 2 – Project information

The aim of the Stage 2 document is to provide Registered Aboriginal Parties (RAPs) with information about the scope of the project, the proposed cultural heritage assessment process, and to seek their feedback on the project.

The project

TSA Riley are in the process of preparing planning reports that include:

- A new public high school in Tallawong/Schofields to cater for 1000 students in the first term of government, with a master plan to accommodate up to 2000 students and intensive English centre.
- 98 teaching spaces.
- 6 support learning units.
- 1 hall.
- Core facilities including administration building, staff hub, library, specialist Learning hubs including science learning, visual arts, wood & metal tech, food & textiles, health + PE, performing arts and additional Learning hubs.
- Amenities, storage and services.

Biosis has been engaged by TSA Riley on behalf of SINSW to undertake the ACHA to support the planning of the high school and to inform the proposed works design in consideration of the Aboriginal values of the area. The ACHA will be prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform TSA Riley on behalf of SINSW of any measures that should be adopted to best manage the Aboriginal cultural and archaeological values of the study area.

Study area

The study area encompasses an approximately 4-hectare portion of 201 Guntawong Road, Tallawong (part of Lot 1 DP 1283186), NSW. It is within the City of Bankstown LGA and is approximately 37.5 kilometers north-west of the Sydney central business district (Figure 1 and Figure 2).

Background

The study area is located on a sloped to flat landform within the Cumberland Plain and is also located within the Hawkesbury Sandstone geological formation. Within the local region, the areas likely to withhold Aboriginal sites would be slightly elevated, well-drained areas in the lower parts of valleys.

Biosis has conducted a search of the Aboriginal Heritage Information Management System (AHIMS) database on 26 August 2024 (Client Service ID: 934369) that identified 83 Aboriginal archaeological sites within a 1.25 kilometre by 1.25 kilometre search area, centred on the study area (Figure 3 and Photo 1). Two of these sites are located in the study area, AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4. There is also a nomination for an Aboriginal Place *Nangamay Ngurra*, that includes the study area, as well as:

- Lot 9 Section Q DP 712
- Lot 1-3, 22-26 DP 1447
- Lot 33 DP 39341
- Lot 4, 5, 43, 44, 46, 47 DP 1239068
- Lot 20 and 21 DP 1246798
- Lots 4 (part), 5, 6 (part), 8 DP 1252397
- Lot 1 DP 1283186
- Cranbourne Street (part)
- Keogh Street (part)
- Orticelli Street (part)
- Skinner Street (part)
- Keogh Street (part)

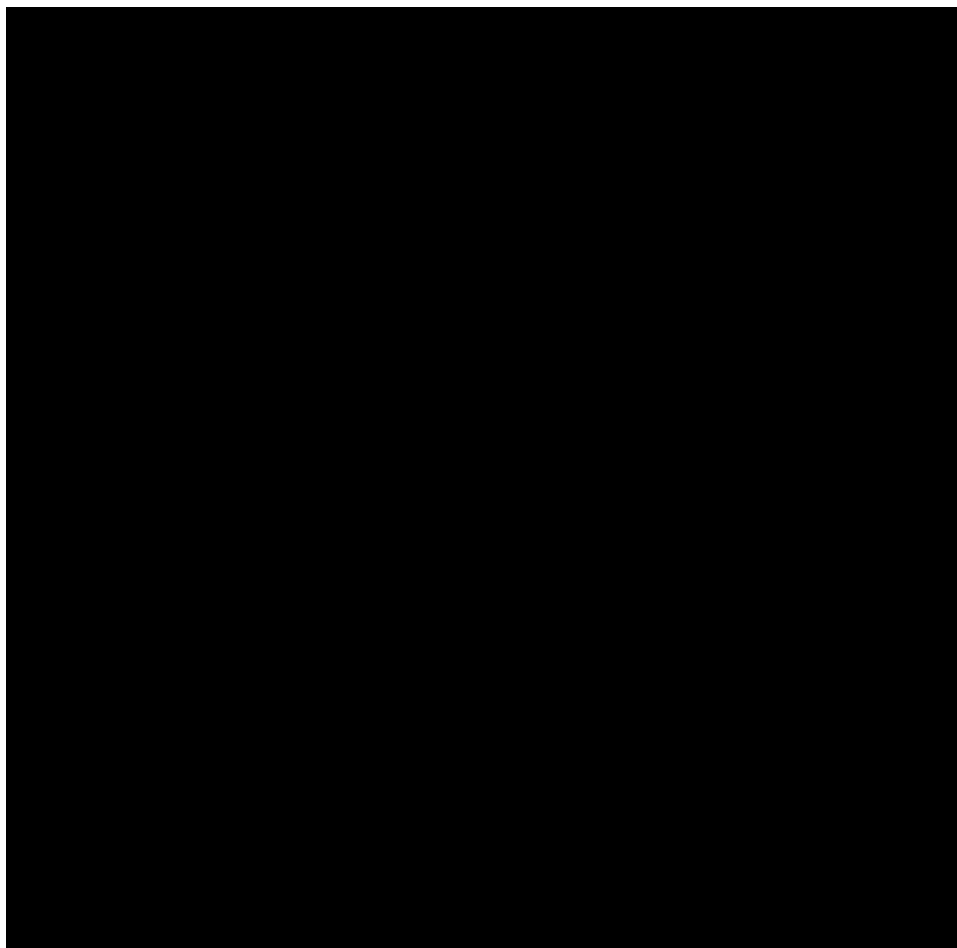


Photo 1 AHIMS site extents within and nearby to the study area, with the study area outlined in red

AHIMS 45-5-5766/Guntawong Road 2 consists of a moderate to high density subsurface artefact scatter identified across the lower slope landform adjacent to a drainage tributary of First Ponds Creek. A variety of

artefact types and one tool were recovered, of regionally typical raw materials. The site demonstrated moderate scientific value due to relatively intact soils that may have preserved moderate to high density archaeological deposits. It is likely that further investigation of the site could contribute to our understanding of past Aboriginal land use bordering drainage tributaries in close proximity to First Ponds Creek. Based on its intactness, representativeness, and research potential, this site was therefore assessed as displaying moderate archaeological significance.

AHIMS 45-5-5821/Guntawong Road 4 consists of a very low density artefact scatter identified within a mid slope landform, recorded by Kelleher Nightingale Consulting Pty Ltd (KNC) (2024). The site was noted as being consistent with the site occupation models for the region. The relatively stable and intact soils indicate that previous land use practices have not significantly impacted or disturbed any subsurface archaeological deposits in this portion of the study area, and the test results are likely an accurate reflection of Aboriginal land use practices in the area. The isolated, low-density artefacts are characteristic of background scatter across the landscape with no clear foci or activity areas at this location. Based on the intactness, representativeness and research potential of the site, GR4 was assessed as containing low archaeological significance by KNC.

A large number of archaeological assessments have been undertaken within the local area with several of these assessments directly assessing the current SINSW study area. Brief summaries of the assessments that have previously included the current study area are provided in Table 1. A number of additional assessments which have undertaken works to the west of the current study area, relating to the nearby A7 archaeological site complex will be included within the ACHA background research.

Table 1 Nearby assessments

Report	Summary of results
Extent (2020)	Extent undertook an ADDA for 201 Guntawong Road as part of initial development planning for the site. This assessment undertook background research and a field survey. Extent noted that the eastern portion of 201 Guntawong Road, which the current study area is located, contained areas of disturbance located across slopes and hill crests. Extent determined that these areas of disturbance were unlikely to contain intact soil profiles and the likelihood of archaeological sites was low. Areas adjacent to First Ponds Creek associated with the A7 site complex to the west of the SINSW study area displayed lower evidence of disturbance and were assessed with high potential to contain intact archaeological deposits. Areas of moderate potential were also identified around the tributaries feeding into First Ponds Creek, with Extent noting that areas within 200 metres of these water courses, and which displayed low-moderate levels of disturbance, had potential to contain sub-surface deposits. Additional investigation in the form of an ACHA was recommended.

Report	Summary of results
KNC (2024)	<p>KNC undertook an ACHA for 201 Guntawong Road for Landcom as part of an application for civil and infrastructure subdivision works following on from Extent (2020). Their assessment included the current SINSW study area in its entirety. KNC identified 5 previously recorded Aboriginal sites within their overall study area, none of which occur within the SINSW study area. They undertook test excavations in areas of moderate potential identified by Extent (2020) as being within 200 metres of water course with low evidence of disturbances present. The results of KNC's excavations supported the predictions of Extent (2020) and KNC identified an additional three Aboriginal sites, AHIMS 45-5-5765/ Guntawong Road 1, AHIMS 45-5-5766/Guntawong Road 2, and AHIMS 45-5-5821/Guntawong Road 4 in proximity to the tributaries of First Ponds Creek. AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4 are both within the current SINSW study area. AHIMS 45-5-5766/Guntawong Road 2 was located across a lower slope landform adjacent to a tributary of First Ponds Creek. The site was found to contain 15 artefacts across 6 test pits resulting in a density of 10 artefacts per square metre. AHIMS 45-5-5821/Guntawong Road 4 was located on mid slopes running adjacent to Guntawong Road. Two artefacts were identified across 5 test pits giving a density of 1.6 artefacts per square metre. The remainder of the SINSW study area displayed evidence of historical disturbances and were of low potential. KNC recommended that an AHIP be sought for impacts to AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4, with salvage of a sample of AHIMS 45-5-5766/Guntawong Road 2 proposed due to the higher density of artefacts detected.</p>

Survey results

An archaeological survey was undertaken on the 23 October 2024 in accordance with the requirements of the Code. One Biosis heritage consultant and a representative of SINSW targeted all landforms within the study area, focusing on areas of exposure and high ground surface visibility. Each previously recorded AHIMS site within the study area was also visited, as were sites within close proximity to the study area.

Recording during the field investigation followed Requirements 5 to 10 of the Code and industry best practice. Information recorded included:

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.
- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

Where possible, Identification of natural soil deposits within the study area was undertaken. Representative photographs of survey units, landform, vegetation coverage, ground surface visibility was undertaken.

As part of the survey, one representative from Darug Custodian Aboriginal Corporation attended to provide cultural information relating to the site. It was determined that the site had significant cultural connections

to the nearby A7 archaeological complex which contains high cultural and scientific value. Additional information was also provided in relation to a possible massacre site, campground and burial site in the vicinity of the study area (included in the Aboriginal Place nomination - *Nangamay Ngurra*). These three sites were not identified as being within the SINSW study area; however, the proximity of these sites and relatively limited information currently available will require further research as part of the ACHA process.

The results of the survey largely corresponded with the previous results of the Extent (2020) and KNC (2024) assessments. Visibility and exposures were low, however, disturbances were visible across the middle and upper slope landforms of the study area suggesting the eastern portions of the study area were of low potential for sub-surface deposits to be present. Lower slopes landforms and flats adjacent to the tributary were tested previously by KNC (2024) and determined to contain a site, AHIMS 45-5-5766/Guntawong Road 2. It is likely that this site contains a larger extent which was also identified by KNC (2024).

The survey also identified one broken hammerstone on the lower slope landform within an access track exposure. The hammerstone consisted of a quartzite water rounded cobble that was broken transversely but displayed clear pitting on the intact end consistent with use. Some damage was also evident on medial portions of the stone consistent with crushing as a result of vehicle use of the track. The hammerstone did not appear to be in-situ.

The survey identified that no additional archaeological investigation in the form of test excavations is warranted as this will not contribute to the understanding of the archaeological values of the study area.

Project schedule

The proposed schedule and time allocations for the consultation stages are summarised below.

Action	Timeframe	Potential constraints and limitations
Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders	Completed	Project advertised in the <i>Daily Telegraph</i> on 13 September 2024.
Notices sent to identified Aboriginal parties	12 September 2024	N/A
Aboriginal stakeholder registration period	12 September to 27 September 2024	Registration period expired on 27 September 2024
Field investigation	23 October 2024	Survey was completed on the 23 October 2024 with Alyce Haast (SINSW), Mathew Smith (Biosis) and Justine Coplin (Darug Custodian Aboriginal Corporation) in attendance.
Information gathering	Continuous	N/A
Review of draft report	TBC	28 days review time allowed under the consultation guidelines.

Final report	TBC	TBC
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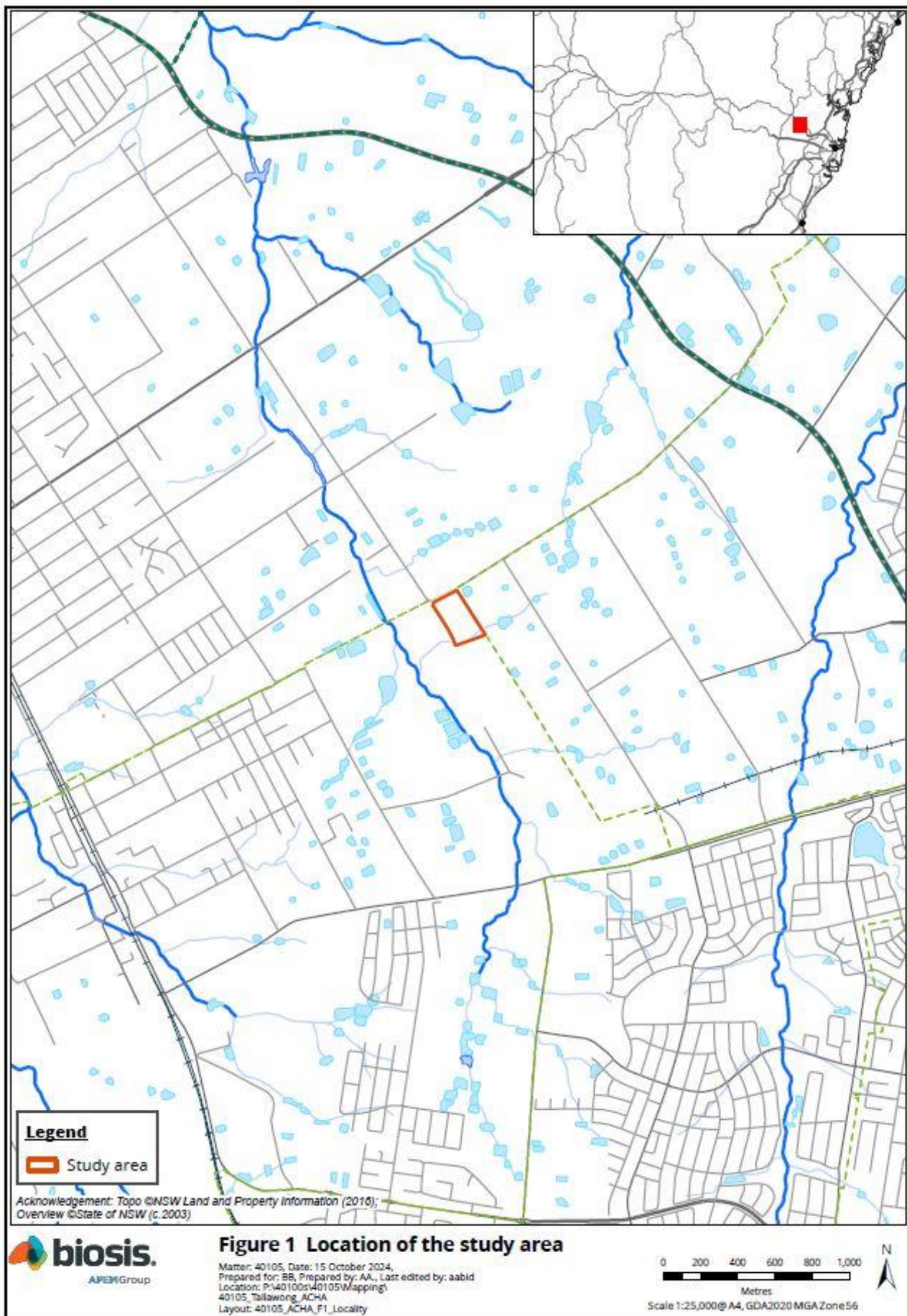
Responsibilities and roles

As part of the consultation process, RAPs will be provided the opportunity to offer input into regulatory processes, contribute to decision making by proponents and government authorities, respond to requests for cultural information and comment on draft reporting, as appropriate. This will be undertaken in accordance with their role specified in Section 5 of the consultation requirements.

Biosis and the proponent, in accordance with their role under Section 5 of the consultation requirements, will consult with the Aboriginal community by:

- Displaying a meaningful appreciation, understanding and respect for the belief system, spiritual connection and sense of belonging that Aboriginal people have to their land, people and environment, which includes plants, animals, waterways, sacred sites and other places of cultural significance and importance.
- Upholding and respecting the traditional rights, obligations and responsibilities of Aboriginal people who hold cultural knowledge in accordance with traditional lore and custom, particularly as these relate to the cultural business of men and women.
- Encouraging active participation of culturally experienced and appropriate Aboriginal people who hold cultural knowledge in the consultation process.
- Encouraging opportunities for the effective transfer of cultural knowledge from older to younger generations in accordance with traditional lore and custom through the consultation process.
- Have an awareness and understanding of how colonisation has impacted the Aboriginal people of Australia.
- Supply suitable project information and provide the opportunity for Aboriginal stakeholders to provide input into the heritage management process (DECCW 2010a).

Each section of the ACHA methodology will be undertaken in consultation with the RAPs for the project. Biosis invites RAPs to provide culturally appropriate information via mail, email or phone with regards to this project.





This figure has been removed for public exhibition.

Stage 3 – Gathering information about cultural significance

The aims of Stage 3 of the consultation process is to facilitate a process where RAPs for the project can:

- Contribute to culturally appropriate information gathering and the research methodology.
- Provide information that will enable the cultural significance of Aboriginal objects and/or places in the proposed study area to be determined.
- Have input into the development of any cultural heritage management options (DECCW 2010a, p.12).

The assessment methodology includes the following tasks:

Background research

This task will identify known Aboriginal sites, areas of potential archaeological sensitivity and previous disturbance, and inform the predictive modelling for the study area. The following steps will be undertaken:

- A search of the AHIMS database will be completed to identify registered sites in the vicinity of the study area. The results of the AHIMS search will be used to obtain relevant site cards and relevant previously completed Aboriginal cultural heritage assessments.
- A review of relevant reports identified through the AHIMS search.
- A review of aerial photographs and other resources to gauge the existing landscape and previous history of land disturbance.
- A review of the historical heritage databases.
- A brief summary of the historical uses of the study area will be developed.

Consultation with the Aboriginal community

This task will provide the Aboriginal community with the opportunity to participate in decisions regarding the management of their cultural heritage by providing proponents information regarding cultural significance and opportunities to input into management options.

Aboriginal community consultation will be undertaken in accordance with the consultation requirements, which includes:

- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 12 September 2024 via Biosis on behalf of TSA Riley and given the opportunity to be involved in consultation.
- This document outlines the details of the project, Aboriginal values currently known in the study area and provides an opportunity for RAPs to provide feedback on appropriate information gathering methodologies. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.

- The draft ACHA and AR will be provided to all RAPs for comment with feedback sought on management and mitigation measures of identified Aboriginal cultural values – the proponent must allow 28 days for comment and consider any comments received. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

Consultation Strategy

Biosis proposes to undertake an approach to consultation utilizing participatory planning principles in the first instance.

Participatory planning is a social research methodology which recognises that local communities/cultures are first and foremost the experts on their own community/culture. Using these principles, local communities/cultures assist or act as researchers, developing culturally appropriate frameworks and protocols to guide research and maintain control over their own knowledge and its representation, use and dissemination.

The following participatory planning principles will inform the consultation undertaken as part of this assessment:

- Aboriginal people are the experts on Aboriginal culture, Aboriginal cultural values, and are the owners of Aboriginal cultural knowledge. Therefore, definitions of the cultural study area, of the study area's cultural values and their significance can only be developed under the guidance of the Aboriginal community.
- The project requires the collection of Indigenous Cultural and Intellectual Property (ICIP). ICIP includes all aspects of Aboriginal peoples' tangible and intangible cultural heritage. Biosis acknowledges that Aboriginal people own, control and maintain their ICIP. Any collection or use of ICIP can only be undertaken with the Free, Prior and Informed Consent (FPIC) of Aboriginal participants.
- Defining concepts such as 'study area', 'cultural values' and developing deliverables such as maps of the study area, categories of cultural values and significance or sensitivity assessments (or rankings) must be viewed as an iterative process. Biosis will critically analyse the data and prepare draft versions of maps, categories of cultural value and measures of significance and sensitivity as starting points to present to the Aboriginal community. These will be subject to definition, refining and re-definition as the project progresses, under the guidance of the Aboriginal community.
- Aboriginal knowledge, ritual practices, places, sacred sites, Dreaming stories, songs, stories, ceremonies, song lines, ceremonial grounds and many other aspects of Aboriginal culture are subject to restrictions on who can visit places, see, hear or know certain kinds of information. Restrictions regarding who can access cultural knowledge are determined by multiple factors including clan and family association, age, gender and ceremonial status. Biosis staff will be guided by the Aboriginal community as to the protocols for recording, assessing, storing and managing culturally sensitive information into the future.

It is currently proposed that Biosis will undertake consultation with groups via written and verbal communication.

Biosis proposed to maintain both a consultation register and consultation log across the life of the project. These will be appended to the ACHA.

The consultation register will list:

- The name and contact details for all Aboriginal parties contacted for the project. Where known, the area of affiliation within the study area will be recorded.

The consultation log will record:

- The date, time and reason for any consultation or contact made with Aboriginal parties. Details will include who made or attempted contact, and notes on what was said or occurred (e.g. left a voice message).

In light of this approach Biosis seeks input on the preferred methods of information collection and storage throughout the ACHA process and has provided a set of draft principles above for the collection, storage and use of information provided by Aboriginal knowledge holders. Additional protocols are also provided in further detail in Appendix 1 for review and comment.

Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment and detail the consultation process in accordance with the consultation strategy. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, results and any recommended mitigation measures.

The main aim of the report is to document the assessment of potential development related impacts to Aboriginal cultural heritage and to formulate strategies to manage these impacts. Reporting will follow the guidelines of Heritage NSW, in particular the consultation requirements, the Code, and the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011).

The ACHA will contain:

- Details of the Aboriginal consultation process undertaken as part of the assessment.
- A review and summary of the environmental context of the study area.
- A review and summary of the Aboriginal archaeological context of the study area.
- Aboriginal site significance assessment.
- Impact assessment.
- Management strategies.
- Maps detailing any Aboriginal sites identified during the assessment process.

The RAPs will be provided with the draft ACHA and AR, and their comments on the report content sought. Comments on the report's content are to be provided to Biosis by the party's respective nominated spokesperson(s). All comments not provided in writing will be recorded in accordance with the proposed consultation strategy. These comments and responses to these comments will be documented in the final ACHA.

The RAPs will be provided with the draft report for comment and allowed **28 days** for review. The final report will incorporate all comments and will be forwarded on to RAPs once completed.

Summary

The aim of this letter is to provide information about the project, and the proposed ACHA and consultation methodologies and to seek your feedback to inform the ACHA.

Biosis is currently requesting:

- RAPs provide comment on their preferred methods for the collection, sharing and storage of cultural information throughout the consultation process.
- Following comments on the preferred consultation methods Biosis is also requesting that any information regarding the cultural significance of Aboriginal objects and/or places in the proposed study area be provided in accordance with any preferred consultation methods, principles or protocols.
- RAPs have an input into the development of any cultural heritage management options relating to identified Aboriginal sites and cultural values present in the study area.

It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by 5:00PM 28 November 2024.

References

AIATSIS 2020a, 'AIATSIS Code of Ethics for Aboriginal and Torres Strait Islander Research', <Australian Institute of Aboriginal and Torres Strait Islander Studies, Canberra, ACT. <https://aiatsis.gov.au/sites/default/files/2020-10/aiatsis-code-ethics.pdf>>.

AIATSIS 2020b, 'Free, Prior and Informed Consent (FPIC) policy snapshot', <Australian Institute of Aboriginal and Torres Strait Islander Studies, Canberra, ACT. https://aiatsis.gov.au/sites/default/files/research_pub/FPIC_Snapshot_2020.pdf>.

DECCW 2010a, *Aboriginal Cultural Heritage Consultation Requirements for Proponents*, New South Wales Government Department of Environment and Climate Change., Sydney, NSW.

DECCW 2010b, 'Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW', <Department of Environment, Climate Change and Water NSW, Sydney, NSW. <https://www.environment.nsw.gov.au/research-and-publications/publications-search/code-of-practice-for-archaeological-investigation-of-aboriginal-objects-in-nsw>>.

Extent Heritage 2020, *Guntawong Road, Schofields – Aboriginal Heritage Due Diligence Assessment. Prepared for APP Corporation Pty Ltd.*

KNC 2024, *Guntawong Road Precinct, Tallawong NSW Proposed Residential Development – Aboriginal Cultural Heritage Assessment. Prepared for Landcom.*

OEH 2011, 'Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW', <Office of Environment and Heritage, Department of Premier and Cabinet, Sydney NSW>.

Appendix 1. Additional Consultation Protocols

Indigenous Cultural and Intellectual Property rights

The following principles have been set out by AIATSIS (AIATSIS 2020a, AIATSIS 2020b) in regards to ICIP, and are adopted here:

Indigenous Cultural and Intellectual Property Rights refer to the rights of Indigenous peoples to:

- *Own, control and maintain their ICIP.*
- *Ensure that any means of protecting ICIP is based on the principle of self-determination.*
- *Be recognised as the primary guardians and interpreters of their cultures.*
- *Authorise or refuse the use of ICIP according to their own law.*
- *Maintain the secrecy of Indigenous knowledge and other cultural practices.*
- *Guard the cultural integrity of their ICIP be given full and proper attribution for sharing their cultural heritage.*
- *Control the recording of cultural customs, expressions and language that may be intrinsic to cultural identity, knowledge, skill and teaching of culture.*
- *Publish their research results.*

The collection, storage and use of any ICIP is subject to the informed consent of individuals taking part in the project.

Biosis requests any comments regarding preferred management of ICIP during the consultation process.

Informed consent protocols:

The following protocols regarding informed consent for the collection and use of ICIP and participation are proposed across the ACHA:

- Prior to the collection of any cultural information, Biosis will seek the informed consent of participating Aboriginal knowledge holders and stakeholders.
- If required, all Aboriginal knowledge holders and stakeholders will be provided with a plain English statement about the project, why information about cultural values is being collected and how it will be used and managed.
- All Aboriginal knowledge holders and stakeholders who agree to participate in the provision of cultural knowledge must sign a consent form.
- Consent is voluntary and can be withdrawn at any stage of the project.
- Informed consent will be required at each stage of the project where participants are asked to provide cultural information.

Information management protocols

The following section sets out the protocols for the management of ICIP collected across the life of the project and after the project's completion. These protocols are subject to review and change in accordance with instructions received from Aboriginal stakeholders across the life of the project.

General information management

- With the exception of publicly available information, no communication or public release of information concerning Aboriginal cultural heritage collected during the project will be permitted without the written permission of Aboriginal stakeholders.
- Information collected from Aboriginal stakeholders during the project will be recorded in the form of meeting notes, field notes, photographs, drawings, maps and geospatial data.
- Information collected for the project will only be used for the project. However, opportunities for further use of the information (for example research papers, interpretive signage, presentations) may be identified during the project or after the project's completion. Any additional use of the information will require the informed written consent of Aboriginal stakeholders.
- At any time during or after the project's completion, individual Aboriginal stakeholders will be able to obtain copies of the information they, as an individual, have provided to Biosis.
- No onsite photographs or information concerning Aboriginal cultural heritage will be circulated to the media or via social media without the informed written consent of Aboriginal stakeholders.
- All information collected will be stored in a secure location, accessible only to Biosis and SINSW. Information collected by Biosis will be stored on Biosis' secure, private servers.
- Field notes, meeting notes, cameras, GPS and any other device used to capture information about the project will be stored in a secure location across the life of the project if they retain the collected information.
- At the project's completion, all information collected from Aboriginal stakeholders will be stored in accordance with the instructions of the Aboriginal community. This may include lodging the documents at an appropriate repository, such as AIATSIS and AHIMS.

Culturally sensitive information

Culturally sensitive or restricted information may be encountered during the project. Such information may include sacred sites, places, artefacts, traditional stories, songs, ceremonial designs, drawings or images subject to culturally-defined access restrictions. Access to this information may be restricted upon gender (biological sex), age, clan, group membership or other culturally-defined categories.

Protocols for the management of culturally sensitive information encountered during the project will be developed in consultation with Aboriginal knowledge holders and stakeholders as part of this methodology but may include:

- Using buffer areas on maps and in reports which record sites as 'no access' or 'restricted'.
- Collection of gender-restricted material or visits to gender-restricted sites and places by researchers of the appropriate gender.
- Collection of age, clan/group-restricted or other restricted information under instruction from the owners of that knowledge.

- Strategies for the storage and access to culturally sensitive information across the life of the project. For example, gender-restricted information stored in a locked or password-protected location, which only authorised people have access to.
- Strategies for the storage and access to culturally sensitive information following the completion of the project. These strategies may include the return of all culturally-sensitive information to appropriate Aboriginal knowledge holders and the deletion of information from electronic records.
- Consider if an important cultural place is already protected by environmental legalisation and need not be further highlighted e.g. totemic species breeding habitat.

Once comments are received, a final information management protocol will be created and used across the life of the project. All consultations regarding the information methodology will be kept in the project log.

From: [REDACTED]
To: [Bronte Baonza](#)
Subject: RE: 40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW
Date: Friday, 1 November 2024 2:18:02 PM
Attachments: [REDACTED]

Hi Bronte,

Guntawang agrees to the responsibilities and roles that we will participate in for this project,
We support the consultation strategy and consultation with Aboriginal communities.
We also support Appendix 1 Additional consultation Protocols.

Kind regards

Wendy Morgan
CEO GARI
[REDACTED]

From: Bronte Baonza <BBaonza@biosis.com.au>
Sent: Thursday, 31 October 2024 3:41 PM
Subject: 40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW

Good afternoon,

Thank you for registering your interest in the Schofields-Tallawong Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf of School Infrastructure New South Wales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (part of Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area (LGA), New South Wales (NSW) (the project). The project is to be assessed as a Review of Environmental Factors under Part 5 of the *Environmental Planning and Assessment Act 1979*.

It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by 5:00PM 28 November 2024 either by email, phone or return mail.

Please address feedback to:

Bronte Baonza
Biosis Pty Ltd
Unit 14 17-27 Power Avenue,
Alexandria, NSW 2015
bbaonza@biosis.com.au

Please do not hesitate to contact me if you require additional information or have any queries about the methodology or information provided.
Yours sincerely

Bronte Baonza
Heritage Consultant

☐ 0438 191 025
☐ BBaonza@biosis.com.au
☐ www.biosis.com.au



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From: [REDACTED]
To: [Bronte Baonza](#)
Subject: Re: 40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW
Date: Wednesday, 6 November 2024 4:11:51 PM
Attachments: [REDACTED]

Hi Bronte
I have read the project information and ACHA methodology for the above project, I endorse the recommendations made.
Kind regards
Darleen
[REDACTED]

On Thursday 31 October 2024 at 03:41:24 pm AEDT, Bronte Baonza <bbaonza@biosis.com.au> wrote:

Good afternoon,

Thank you for registering your interest in the Schofields-Tallawong Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for TSA Riley on behalf of School Infrastructure New South Wales (SINSW) to inform the development of a high school at 201 Guntawong Road, Tallawong (part of Lot 1 DP 1283186) (the study area), within the City of Blacktown Local Government Area (LGA), New South Wales (NSW) (the project). The project is to be assessed as a Review of Environmental Factors under Part 5 of the *Environmental Planning and Assessment Act 1979*.

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Please address feedback to:

Bronte Baonza
Biosis Pty Ltd
Unit 14 17-27 Power Avenue,
Alexandria, NSW 2015
bbaonza@biosis.com.au

Please do not hesitate to contact me if you require additional information or have any queries about the methodology or information provided.

Yours sincerely

Bronte Baonza
Heritage Consultant

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From: [REDACTED]
To: [Molly Crissell](#)
Subject: Re: 40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW - One week remaining.
Date: Thursday, 21 November 2024 12:50:08 PM
Attachments: [REDACTED]

Hi Molly

We are happy with what you've provided and would like to be including the Fieldwork thank you so much, Paul

[REDACTED]

On Thursday, November 21, 2024, 11:07 am, Molly Crissell <MCrissell@biosis.com.au> wrote:

Good morning,

Just a quick reminder that the period for comment on Stage 2/3 of community consultation closes in one week for the Schofields-Tallawong Project. It would be appreciated if you would provide feedback on the project information and methodology by 5:00PM 28 November 2024.

Kind regards,
Molly

Molly Crissell She/Her
Heritage Consultant

📞 0438 390 129
✉ MCrissell@biosis.com.au
🌐 www.biosis.com.au



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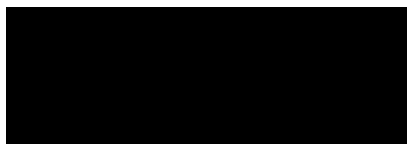
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From: [REDACTED]
To: [Molly Crissell](#)
Subject: Re: 40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW - One week remaining.
Date: Wednesday, 27 November 2024 11:22:45 AM

DARUG CUSTODIAN
ABORIGINAL
CORPORATION



Warami Molly

Thank you for providing the project information and proposed methodology for the Schofields-Tallawong High School ACHA. The proposed development is within Nangamay Ngurra and will cause significant direct and indirect harm to Dharug heritage. This harm cannot be minimised or mitigated.

We object to the development, and recommend that the ACHA process be put on hold while an alternative location is found for the development. This is the only option to avoid harm to Nangamay Ngurra. It is disrespectful and irresponsible of School Infrastructure NSW to propose construction in this landscape.

The location and significance of the A7 Archaeological Complex has been known since 2008. Since then, cumulative impact to the complex has been facilitated by a focus on archaeological significance and on discrete archaeological sites and developments, and a neglect of the overall Dharug landscape. This approach is evident in the proposed assessment methodology.

If the proponent chooses to proceed with the ACHA, we require an amended assessment methodology, including additional and detailed information about how the impact on Nangamay Ngurra will be investigated, assessed and avoided.

Yanu
Justine

----- Original Message -----

From:
"Molly Crissell" <MCrissell@biosis.com.au>

To:

Cc:

Sent:

Thu, 21 Nov 2024 00:07:18 +0000

Subject:

40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW - One week remaining.

Good morning,

Just a quick reminder that the period for comment on Stage 2/3 of community consultation closes in one week for the Schofields-Tallawong Project. It would be appreciated if you would provide feedback on the project information and methodology by 5:00PM 28 November 2024.

Kind regards,

Molly

Molly Crissell She/Her
Heritage Consultant

0438 390 129
MCrissell@biosis.com.au
www.biosis.com.au

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Molly Crissell

From:

Sent:

Friday, 13 December 2024 1:49 PM

To:

Molly Crissell

Cc:

Subject:

RE: 40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW.

Warami Molly

Thank you for your email. The response does not address the issues that I have raised. It suggests that neither Schools Infrastructure NSW nor Biosis has any understanding of the harm that will result from the proposed development, or any intention to properly assess or address this harm.

The Dharug landscape Nangamay Ngurra includes a massacre site, and is not appropriate as a location for a school. The significance of the A7 Archaeological Complex has been known since 2008 and should have been considered by Schools Infrastructure NSW in their selection of a site. Their selection of the site should now be reconsidered, as the only way to avoid harm to this significant Place.

The proposed methodology is not adequate to assess the harm to Nangamay Ngurra that will result from the development. The suggestion that this harm can be addressed by reducing the impact to AHIMS #45-5-5766, one small component of the Place, is inadequate. It continues the focus on the archaeological elements of the Place that has allowed ongoing cumulative impact to the landscape, and a neglect of its broader significance as Dharug heritage.

Please provide a response that addresses these issues directly.

The proposed methodology is not adequate to address the Aboriginal heritage impact of the development.

We object to the development, and recommend that the ACHA process be put on hold while an alternative location is found for the development. This is the only option to avoid harm to Nangamay Ngurra. It is disrespectful and irresponsible of School Infrastructure NSW to propose construction in this landscape.

The location and significance of the A7 Archaeological Complex has been known since 2008. Since then, cumulative impact to the complex has been facilitated by a focus on archaeological significance and on discrete archaeological sites and developments, and a neglect of the overall Dharug landscape. This approach is evident in the proposed assessment methodology.

If the proponent chooses to proceed with the ACHA, we require an amended assessment methodology, including additional and detailed information about how the impact on Nangamay Ngurra will be investigated, assessed and avoided.

Didyarigura
Justine

----- Original Message -----

From:

To:

Cc:

Sent:

Wed, 11 Dec 2024 05:03:46 +0000

Subject:

RE: 40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW.

Good afternoon Justine,

Thank you for providing a response on the Stage 2 and 3 consultation document for the Schofields-Tallawong High School.

Your response will be included within the ACHA and will inform the recommendations.

School Infrastructure NSW have advised the following in regards to the site selection for the proposed Schofields-Tallawong High School:

School Infrastructure assessed three potential sites to develop the Schofields-Tallawong High School to meet current and future demand for public high-school tuition in the area. Optioneering was limited to these three sites based on the high forecasted demographic growth and the limited number of land parcels available for acquisition within the area of service need.

The two other potential school sites were investigated for development in accordance with School Infrastructure property due diligence processes. These other two site were discounted for the following reasons:

- An available land parcel located in the area was discounted as it was located near an active abattoir and in an area where precinct development of critical infrastructure (roads and services) and land rezoning requirements would not be available in time to allow the school to be developed in time to address the service need.
- An available land parcel in the area was discounted as it was too close to an existing high school (approximately 500m away from Rouse Hill High School). In addition, the land parcel was zoned for future government housing supply initiatives and has an on-site water detention basin which would have significantly impeded construction and operation of a school on the land.

As neither of the above sites were suitable for development to meet the growing student service need in this area, the current Schofields-Tallawong site was selected for development.

School Infrastructure also confirms that based on the Aboriginal cultural heritage investigations, impacts to the Guntawong Road 2 archaeological site (AHIMS# 45-5-5766) have been reduced through redesign. The majority of the Guntawong Road 2 site within the high school area will now not be impacted, and will be conserved and protected from harm as an area of natural drainage overflow.

Please let me know if you have additional comments.

Kind regards,

Molly

Molly Crissell She/Her
Heritage Consultant

0438 390 129

MCrissell@biosis.com.au

www.biosis.com.au

Duwz rune | Vkhœ | Nvfkhqnd. Fdfn rq wkh edqqhuwr ilgg rxwp ruh derxwkwlv slfh1

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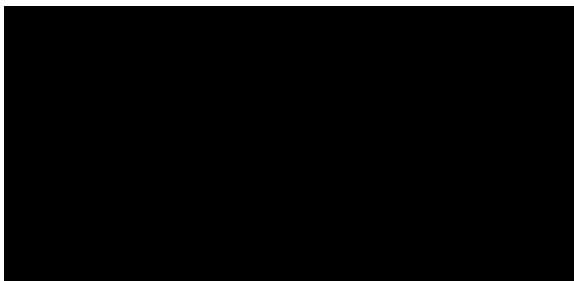
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From: [REDACTED]
Sent: Wednesday, November 27, 2024 11:23 AM
To: Molly Crissell <MCrissell@biosis.com.au>
Subject: Re: 40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW - One week remaining.

DARUG CUSTODIAN

ABORIGINAL

CORPORATION



Warami Molly

Thank you for providing the project information and proposed methodology for the Schofields-Tallawong High School ACHA. The proposed development is within Nangamay Ngurra and will cause significant direct and indirect harm to Dharug heritage. This harm cannot be minimised or mitigated.

We object to the development, and recommend that the ACHA process be put on hold while an alternative location is found for the development. This is the only option to avoid harm to Nangamay Ngurra. It is disrespectful and irresponsible of School Infrastructure NSW to propose construction in this landscape.

The location and significance of the A7 Archaeological Complex has been known since 2008. Since then, cumulative impact to the complex has been facilitated by a focus on archaeological significance and on discrete archaeological sites and developments, and a neglect of the overall Dharug landscape. This approach is evident in the proposed assessment methodology.

If the proponent chooses to proceed with the ACHA, we require an amended assessment methodology, including additional and detailed information about how the impact on Nangamay Ngurra will be investigated, assessed and avoided.

Yanu

Justine

----- Original Message -----

From:

"Molly Crissell" <MCrissell@biosis.com.au>

To:

Cc:

Sent:

Thu, 21 Nov 2024 00:07:18 +0000

Subject:

40105 - Schofields-Tallawong High School: Stage 2 and 3 Aboriginal Community Consultation – 201 Guntawong Road, Tallawong NSW - One week remaining.

Good morning,

Just a quick reminder that the period for comment on Stage 2/3 of community consultation closes in one week for the Schofields-Tallawong Project. It would be appreciated if you would provide feedback on the project information and methodology by 5:00PM 28 November 2024.

Kind regards,

Molly

Molly Crissell She/Her
Heritage Consultant

0438 390 129
MCrissell@biosis.com.au
www.biosis.com.au

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Appendix 4 Stage 4: Review of draft cultural heritage assessment report

From: [Molly Crissell](#)

Bcc:

Subject: 40105 - Schofields-Tallawong High School Draft ACHA/AR - Request for review - Stage 4

Date: Friday, 20 December 2024 4:01:00 PM

Good afternoon,

Thank you for your registration in the Schofields-Tallawong High School project.

The draft ACHA and AR is now available for your review here: <https://we.tl/t-wnTgiXl7Jn>

Please provide any comments or feedback to myself by 5:00 PM 27 January 2025 through the details below.

Let me know if you have any issues accessing the reports at your earliest convenience.

Have a lovely holiday season,

From: [REDACTED]
To: [Molly Crissell](#)
Subject: Re: 40105 - Schofields-Tallawong High School Draft ACHA/AR - Request for review - Stage 4
Date: Monday, 20 January 2025 1:12:43 PM
Attachments: [REDACTED]

Hi Molly,

I hope I am not too late.

Guntawang agrees with Draft AcHA/AR for Stage 4 of the 40105 Schofields- Tallawong High School.

Guntawang has an experienced cultural and heritage officer who has worked with Sydney University to identify the differences between Indigenous Australian' s bone structure to Non- Indigenous People. He has participated and co-ordinated a repatriation of Aboriginal skeletal remains to the land from which she belonged. He has years of experience in identifying Aboriginal artefacts. He has worked with numerous Archaeologist on similar projects. Guntawang would like to be included in any field work or excavation involved with this project.

We look forward to working with you.

Kind regards

Wendy Morgan
CEO GARI



From: Molly Crissell <MCrissell@biosis.com.au>
Sent: Friday, December 20, 2024 4:01 PM
Subject: 40105 - Schofields-Tallawong High School Draft ACHA/AR - Request for review - Stage 4

Good afternoon,

Thank you for your registration in the Schofields-Tallawong High School project.

The draft ACHA and AR is now available for your review here: <https://we.tl/t-wnTgiXl7Jn>

Please provide any comments or feedback to myself by 5:00 PM 27 January 2025 through the details below.

Let me know if you have any issues accessing the reports at your earliest convenience.

Have a lovely holiday season,

Molly Crissell She/Her
Heritage Consultant

📞 0438 390 129

✉ MCrissell@biosis.com.au

🌐 www.biosis.com.au



Artwork by Shelby Kschenka. Click on the banner to find out more about this piece.

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From: [Anthea Vella](#)
To: [REDACTED]
Cc: [Molly Crissell](#)
Subject: 40105 - Schofields-Tallawong High School: 201 Guntawong Road, Tallawong NSW - ACHA Stage 4 Response
Date: Tuesday, 14 January 2025 3:09:12 PM
Attachments: [REDACTED]

Hi Wendy,

Thank you for your time on the phone this afternoon.

As discussed, I have included the notes below from our conversation. Please review and let me or Molly know if there are any additional comments questions.

- Sub-surface excavations to be undertaken in the study area.
- Any Aboriginal artefacts identified are to be reburied on site as they should be taken back to Country. Once artefact are bagged after excavations they spend a long time in consultants offices. RAPs are not always notified if they have been reburied or not.
- Signs to be put up for the interpretation of the site – this could be a painting of the artefacts with an explanation of what the artefacts were used for.

I have also included a response below as to why excavations were not recommended within the draft ACHA:

Based on the results of the field investigation and previous test excavations undertaken by KNC the study area displays sporadic, and isolated deposits of archaeological material. These areas of material are restricted to the areas of minimal disturbance such as at AHIMS 45-5-5821/Guntawong Road 4 on the northern boundary of the study area, and AHIMS 45-5-5766/Guntawong Road 2 in the western portion of the study area associated with the flat landform in close proximity to the drainage line. Disturbances in the eastern and central portions (disturbance in eastern portion - stock yards and areas of cut and fill earthworks present; disturbance in central portion - removal of the native Cumberland Plain woodland) of the study area will have resulted in the removal of A horizon soils resulting in a low potential that intact sub-surface deposits are present in these areas.

A small portion of AHIMS 45-5-5766/Guntawong Road 2 will be impacted by the proposed activity. Due to the low to moderate density of artefacts, no further works is advised. The majority of AHIMS 45-5-5766/Guntawong Road 2 will not be impacted and will be conserved.

Kind regards,

Anthea

Anthea Vella She / Her
Team Leader - Heritage (NSW)

📞 0427 463 834
✉ AVella@biosis.com.au
🌐 www.biosis.com.au



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From: Molly Crissell
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Nangamay Ngurra - School Infrastructure NSW response to queries
Date: Wednesday, 29 January 2025 9:44:16 AM
Attachments: [REDACTED]

Good morning Justine,

Thank you for your email.

We passed your queries onto School Infrastructure, and their response is as follows:

Comment no. 1 – ongoing consultation with DCAC in relation to ACHAR preparation

School Infrastructure understands that the study area is within the boundaries of the nominated Aboriginal Place Nangamay Ngurra and that Dharug Custodian Aboriginal Corporation provided their information on the cultural landscape to Biosis during their site walk on 23 October 2024. This information has been provided in the ACHAR in section 4.3.2. This assessment has been prepared in full accordance with relevant guidelines, including the Guide to investigation, assessing and reporting on Aboriginal cultural heritage in NSW.

School Infrastructure previously shared information with Dharug Custodian Aboriginal Corporation on 11 December 2024 with detail about alternate school sites and why they were unfortunately unfeasible for the current development.

Comment no. 2 – query related to DCAC viewing fencing installation at the Guntawong Road site:

School Infrastructure installed fencing around the boundary of the proposed development site in order to prevent unauthorised access. This was necessary to halt the ongoing illegal dumping that has been occurring within the land parcel.

Fencing works were informed by the archaeological assessment prepared by Biosis for the subject site and all Aboriginal objects were avoided during fence installation works. Prior to fencing being installed, the boundary of GR2 was digitally mapped followed by pegs being placed approximately 5 metres outside the archaeological site's boundary. Fencing was then installed on the outside of this line so that the archaeological site was not physically impacted. No other archaeological site or Aboriginal object was in proximity to the line of protective fencing.

Kind regards,
Molly

Molly Crissell She/Her
Heritage Consultant

☎ 0438 390 129
✉ MCrissell@biosis.com.au
🌐 www.biosis.com.au



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From: [REDACTED]
Sent: Monday, January 13, 2025 4:35 PM
To: Molly Crissell <MCrissell@biosis.com.au>; [REDACTED]
Cc: [REDACTED]
Subject: Nangamay Ngurra

Warami

I visited Nangamay Ngurra last week and noticed that a fence is being built around the proposed high school location at 201 Guntawong Road, Tallawong. From what I could see, construction has involved clearing vegetation and installation of fenceposts. The property boundary passes through AHIMS #45-5-5766, and I assume there has been some harm to this site. I understand that the ACHAR is still in draft, and that there is no AHIP in place for the project. Can you please let me know how this impact is being managed?

Yanu
Justine

Email sent using Optus Webmail

From: Molly Crissell
To: [REDACTED]
Subject: RE: 40105 - Schofields-Tallawong High School Draft ACHA/AR - Request for review - Stage 4
Date: Wednesday, 29 January 2025 12:18:00 PM
Attachments: [REDACTED]

Hi Phil,

No worries, please find a copy of the report in the link below:

<https://we.tl/t-gXQ35Okyl3>

If you could please provide your response by COB today, that would be appreciated.

Let me know if there are any issues accessing the report.

Kind regards,
Molly

From: [REDACTED]
Sent: Wednesday, January 29, 2025 11:09 AM
To: Molly Crissell <MCrissell@biosis.com.au>
Subject: Re: 40105 - Schofields-Tallawong High School Draft ACHA/AR - Request for review - Stage 4

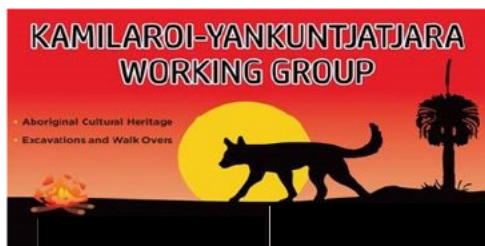
Hi Molly,

Could i ask a favour i would like to review the report and respond however i cant access the report and i understand im over the due date.

If its already closed and you cant resend i understand but if you can i will review the report today and send a response.

Have a nice day.

Kind Regards
Phil Khan – Director



From: Molly Crissell <MCrissell@biosis.com.au>
Sent: Friday, 20 December 2024 4:01 PM
Subject: 40105 - Schofields-Tallawong High School Draft ACHA/AR - Request for review - Stage 4

Good afternoon,

Thank you for your registration in the Schofields-Tallawong High School project.

The draft ACHA and AR is now available for your review here: <https://we.tl/t-wnTgiXl7Jn>

Please provide any comments or feedback to myself by 5:00 PM 27 January 2025 through the details below.

Let me know if you have any issues accessing the reports at your earliest convenience.

Have a lovely holiday season,

Molly Crissell She/Her
Heritage Consultant

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Artwork by Shelby Kschenka. Click on the banner to find out more about this piece.

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From: [Molly Crissell](#)
To: [REDACTED]
Cc: [REDACTED]
Subject: 40105- Schofields and Tallawong High School ACHA
Date: Friday, 31 January 2025 11:34:20 AM
Attachments: [REDACTED]

Hi Justine,

Thank you for your time on the phone yesterday. I have included the notes below from our conversation.

Please review and let me know if there are any additional comments.

- Drove past the site last night (this would have been 29/01), and noted the following: there is full fencing with gates straight through the site (Nangamay Ngurra/our study area). Noted that they have impacted the ground, and questioned how School Infrastructure can undertake this without an AHIP. Video of fencing sent to my phone.
- Biosis communicated that the Aboriginal Place is a nomination and an AHIP is not required. DCAC response to this was that as the AP is not approved it should still remain untouched until it is passed/denied.
- DCAC is not happy with what is happening, and mentioned that the media will be involved soon, as community is not ok with what is going on.
- DCAC has reported the impact from the fence line to the Environment Line.
- DCAC would like the survey section in regards to Tony amended. This section has since been reworded.
- DCAC requested a map displaying the location of the installed fence line and to show how it goes through the AP nomination. We are following this up with School Infrastructure.

Kind regards,

Molly

Molly Crissell She/Her
Heritage Consultant

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Leaders in Ecology, Heritage and Environmental Approvals

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Appendix 5 Archaeological report



New high school for Schofields and Tallawong

Archaeological Report

Prepared for NSW Department of Education

Final Report

13 February 2025

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LGA Blacktown

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Biosis acknowledges the contribution of the following people and organisations in undertaking this study:

- TSA Riley: Maria Soerensen
- NSW Department of Education: Duncan Jones & Alyce Haast

Biosis staff involved in this project were:

- Mathew Smith (assistance in the field)
- Azka Abid (mapping)

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Summary

Biosis Pty Ltd (Biosis) was commissioned by NSW Department of Education (DoE) to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for a proposed future activity of the new high school for Schofields and Tallawong at part of 201 Guntawong Road, Tallawong, New South Wales (NSW) (the study area). The study area is located within Lot 1 DP 1283186 and located approximately 46 kilometres north-east of the Sydney central business district (CBD).

This Archaeological Report (AR) has been prepared to support a Review of Environmental Factors (REF) for the DoE for the construction and operation of the new high school for Schofields and Tallawong (the activity). The purpose of the REF is to assess the potential environmental impacts of the activity prescribed by *State Environmental Planning Policy (Transport and Infrastructure) 2021* (T&I SEPP) as “development permitted without consent” on land carried out by or on behalf of a public authority under Part 5 of *Environmental Planning and Assessment Act 1979* (EP&A Act). The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37 of the T&I SEPP.

This AR documents the findings of the archaeological investigations conducted as part of the ACHA. As required under Section 2.3 of *The Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b) (the Code), the AR provides evidence about the material traces of Aboriginal land use to support the conclusions and management recommendations in the ACHA. DoE is the determining authority and will assess the REF to help them determine if the proposed development is likely to have a significant effect on the environment, including Aboriginal cultural heritage.

The proposed activity is for the construction and operation of a new high school for Schofields and Tallawong. The new high school will accommodate up to 1,000 students. The school will provide 49 permanent teaching spaces (PTS), and three support teaching spaces (STS) across three buildings.

The buildings will be three-storey in height and will include teaching spaces, specialist learning hubs, a library, administrative areas and a staff hub. Additional core facilities are also proposed including a standalone school hall, a carpark, as pick up and drop off zone along Nirmal Street, two sports courts and a sports field.

Specifically, the proposal involves the following:

- Three learning hubs (three-storeys in height) accommodating 49 general teaching spaces and three support learning units (SLUs).
- Other core facilities including amenities, library, staff hub and administrative areas.
- Standalone school hall.
- Separate carpark with 72 spaces.
- Kiss and drop zone along Nirmal Street.
- Open play space including sports courts and sports field.
- Public domain works.

The proposed site access arrangements are as follows:

- Main pedestrian entrance to be located off Nirmal Street.
- Kiss and drop zone proposed along Nirmal Street.

- Onsite parking access via Nirmal Street.

There are 83 Aboriginal cultural heritage sites registered with the Aboriginal Heritage Information Management System (AHIMS) register, both within the study area as well as in the vicinity. There are three registered sites within the study area AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1. The study area is also part of a wider site, known as *Nangamay Ngurra* a proposed Aboriginal Place which consists of a complex of archaeological sites.

The survey was conducted on 23 October 2024 by Mathew Smith (Biosis, Senior Heritage Consultant), Alyce Haast (DoE) and Justine Coplin (Cultural Sites Officer, Dharug Custodian Aboriginal Corporation). The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting ground surface visibility (GSV) combined with a low exposure. One previously unrecorded Aboriginal cultural heritage site was identified during the field investigation, AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1. The site consists of one hammerstone artefact located upon an existing dirt track within the study area. There is high potential for development activities to impact Aboriginal sites and the identified sites within the study area and for direct impact to *Nangamay Ngurra* Aboriginal Place nomination.

Strategies have been developed based on the archaeological significance of cultural heritage relevant to the study area. The strategies also take into consideration:

- Predicted impacts to Aboriginal cultural heritage.
- The planning approvals framework.
- Current best conservation practice, widely considered to include:
 - The ethos of the Australia — International Council on Monuments and Sites (ICOMOS) Burra Charter.
 - the Code.

The recommendations that resulted from the consultation process are provided below.

Management recommendations

Prior to any development impacts occurring within the study area, the following is recommended.

Recommendation 1: Continued consultation with the registered Aboriginal parties

It is recommended that DoE continue to inform these groups about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project. This recommendation is in keeping with the consultation requirements.

Recommendation 2: Application for an AHIP to impact AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1

If avoidance through redesign is unable to occur, it is recommended that that DoE apply to Heritage NSW, NSW Department of Climate change, Energy, the Environment and Water (Heritage NSW) for an AHIP to destroy AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 and to partially impact AHIMS 45-5-5766/Guntawong Road 2 which are currently protected under the NPW Act. The AHIP should be for a term of five years.

A small portion of AHIMS 45-5-5766/Guntawong Road 2 will be impacted by the proposed activity. Due to the

low to moderate density of artefacts, no further works is advised. The majority of AHIMS 45-5-5766/Guntawong Road 2 will not be impacted and will be conserved (refer to Recommendation 3).

It is recommended that the surface stone artefacts associated with AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 is collected prior to construction.

Recommendation 3: Fencing of AHIMS 45-5-5766/Guntawong Road 2

Prior to any works taking place, the majority of AHIMS 45-5-5766/Guntawong Road 2 and the area of moderate archaeological potential which will not be impacted are to be conserved and should be clearly fenced to ensure they will not be harmed by the proposed activity. Fencing must remain in place over the lifespan of the construction phase.

Recommendation 4: No further archaeological work required in the area of low potential once AHIP obtained from Heritage NSW

No further archaeological work is required in the area of low potential except in the event that unexpected human remains are unearthed during any phase of the project (refer to Recommendation 7).

Recommendation 5: Discovery of unanticipated Aboriginal objects

All Aboriginal objects and Places are protected under the NPW Act. It is an offence to disturb an Aboriginal site without a consent permit issued by Heritage NSW. Should any unanticipated Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying Heritage NSW and Aboriginal stakeholders.

Recommendation 6: Discovery of unanticipated historical relics

Relics are historical archaeological resources of local or State significance and are protected in NSW under the *Heritage Act 1977*. Relics cannot be disturbed except with a permit or exception/exemption notification. Should unanticipated relics be discovered during the course of the project, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find. The Heritage Council will require notification if the find is assessed as a relic.

Recommendation 7: Discovery of human remains

If any suspected human remains are discovered during any activity you must:

1. Immediately cease all work at that location and not further move or disturb the remains.
1. Notify the NSW Police and Heritage NSW Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
2. Not recommence work at that location unless authorised in writing by Heritage NSW.

Recommendation 8: Development of an Aboriginal Cultural Heritage Management Plan

It is recommended an Aboriginal Cultural Heritage Management Plan (ACHMP) be developed to appropriately manage Aboriginal cultural heritage identified within the study area. An ACHMP sets out specific guidelines and protocols for the management of Aboriginal heritage across the life of the project inclusive of construction and operational use. This should be inclusive of unanticipated finds protocols, the requirement for heritage inductions to be undertaken by the site personnel prior to works, and long-term care and control

of Aboriginal archaeological materials. The ACHMP must be prepared by a suitably qualified archaeologist in consultation with the RAPs for the project.

Recommendation 9: Heritage Interpretation plan

Given the significance of the region to Aboriginal people, there is an opportunity for heritage interpretation as part of the design. Heritage interpretation is an innovative way to integrate culture into design and can not only honour the deep-rooted connection to the land but also ensure that Aboriginal cultural heritage remains present in the daily operations of the proposed high school. As such, it is recommended that a Heritage Interpretation Plan be prepared by a suitably qualified heritage consultant following the NSW Heritage Council's *Interpreting Heritage Places and Items Guidelines*.

Biosis understands that this recommendation has been captured within the Connecting with Country program undertaken by DoE.

Definitions

ACHA	Aboriginal Cultural Heritage Assessment
ACHMP	Aboriginal Cultural Heritage Management Plan
ADDA	Aboriginal Due Diligence Assessment
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
AR	Archaeological Report
Biosis	Biosis Pty Ltd
BP	Before Present
CBD	Central Business District
Consultation requirements	<i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i>
Cth DCCEEW	Australian Commonwealth Department of Climate Change, Energy, the Environment and Water
DECCW	Department of Environment, Climate Change and Water (now Heritage NSW)
DP	Deposited Plan
DoE	NSW Department of Education
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
ESD	Ecological Sustainable Development
GDA	Geocentric Datum of Australia
GPS	Global Positioning System
GSV	Ground Surface Visibility
Heritage NSW	Heritage NSW, NSW Department of Climate Change, Energy, the Environment and Water
ICOMOS	International Council on Monuments and Sites
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
LGA	Local Government Area
MGA	Map Grid of Australia
NHL	National Heritage List
NNTT	National Native Title Tribunal
NPW Act	<i>National Parks and Wildlife Act 1974</i>
NPWS	National Parks and Wildlife Service
NSW	New South Wales
NSW DCCEEW	NSW Department of Climate Change, Energy, the Environment and Water
NTSCORP	Native Title Services Corporation
PAD	Potential Archaeological Deposit

PTS	Permanent Teaching Spaces
RAPs	Registered Aboriginal Parties
REF	Review of Environmental Factors
SLUs	Support Learning Units
STS	Support Teaching Spaces
The Code	<i>Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW</i>
The study area	Part of 201 Guntawong Road, Tallawong NSW (Lot 1 DP1283186)
T&I SEPP	State Environmental Planning Policy (Transport and Infrastructure) 2021

1 Introduction

1.1 Project background

Biosis was commissioned by DoE to undertake an ACHA of the proposed future development of the new high school for Schofields and Tallawong at part of 201 Guntawong Road, Tallawong (Lot 1 DP 1283186) NSW (study area) (Figure 1 and Figure 2). This AR documents the findings of the archaeological investigations conducted as part of the ACHA. The AR provides evidence about the material traces of Aboriginal land use to support the conclusions and management recommendations in the ACHA.

The future development of the site will involve ground disturbing works that will have the potential to impact known and unknown Aboriginal heritage constraints that may be present within the study area. The project is to be assessed as REF under Part 5.1 of the EP&A Act.

This investigation has been carried out under Part 6 of the NPW Act and in accordance with the Code. The Code has been developed to support the process of investigating and assessing Aboriginal cultural heritage by specifying the minimum standards for archaeological investigation undertaken in NSW under the NPW Act.

It is stated in Section 1.2 of the Code that where the ACHA report concludes that the proposed activity will result in harm to Aboriginal objects or declared Aboriginal Places, an application for an AHIP will be required. This application must be supported by an ACHA report.

The EP&A Act includes provisions for local government authorities to consider environmental impacts in land-use planning and decision making. Each Local Government Area (LGA) is required to create and maintain a Local Environmental Plan (LEP) that includes Aboriginal and historical heritage items. Local Councils identify items that are of significance within their LGA, and these items are listed on heritage schedules in the local LEP and are protected under the EP&A Act and the Heritage Act.

1.2 Study area

The site is known as 201 Guntawong Road, Tallawong and is legally described as part of Lot 1 DP 1283186 (Figure 2). The site is located at the corner of Guntawong Road and Clarke Street, Tallawong and is approximately 4 hectares. The site has an approximately 100-metre-long frontage to Guntawong Road along its northern boundary. Nirmal Street provided a partial frontage along the eastern boundary of the site with plans to extend Nirmal Street to provide a future connection to Guntawong Road.

The site is predominantly cleared land and consists of grassland with several patches of remnant native vegetation particularly within the northern portion of the site. As a result of precinct wide rezonings, the surrounding located is currently transitioning from a semi-rural residential area to a highly urbanised area with new low to medium density residential development with supporting services. The site is located approximately 1.5 kilometres to the north-west of Tallawong Metro Station and is also serviced by an existing bus stop along Guntawong Road.

1.3 Planning approvals

The proposed development will be assessed against Part 5.1 of the EP&A Act. Other relevant legislation and planning instruments that will inform this assessment include:

- NPW Act.

- *National Parks and Wildlife Amendment Act 2010 (NSW).*
- *State Environmental Planning Policy (Transport and Infrastructure) 2021*
- *State Environmental Planning Policy (Industry and Employment) 2021.*
- *Environmental Planning and Assessment Regulation 2021.*
- *Blacktown LEP 2015.*
- *Blacktown Development Control Plan 2015.*

1.4 Objectives of the investigation

The objectives of the investigation can be summarised as follows:

- To identify and consult with any registered Aboriginal stakeholders and the Deerubbin Local Aboriginal Land Council.
- To conduct additional background research in order to recognise any identifiable trends in site distribution and location.
- To search statutory and non-statutory registers and planning instruments to identify listed Aboriginal cultural heritage sites within the study area.
- To highlight environmental information considered relevant to past Aboriginal occupation of the locality and associated land use and the identification and integrity/preservation of Aboriginal sites.
- To summarise past Aboriginal occupation in the locality of the study area using ethnohistory and the archaeological record.
- To formulate a model to broadly predict the type and character of Aboriginal sites likely to exist throughout the study area, their location, frequency and integrity.
- To conduct a field survey of the study area to locate unrecorded or previously recorded Aboriginal sites and to further assess the archaeological potential of the study area.
- To assess the significance of any known Aboriginal sites in consultation with the Aboriginal community.
- To identify the impacts of the proposed development on any known or potential Aboriginal sites within the study area.
- To recommend strategies for the management of Aboriginal cultural heritage within the context of the proposed development.

1.5 Investigators and contributors

The roles, previous experience and qualifications of the Biosis project team involved in the preparation of this AR are described below in Table 1.

Table 1 Investigators and contributors

Name and qualifications	Experience summary	Project role
Samantha Keats	Samantha is the NSW Heritage Manager with Biosis Wollongong office and has over eight years of experience as an	<ul style="list-style-type: none"> • Project Director

Name and qualifications	Experience summary	Project role
BA (Hons)	archaeologist. Samantha has had experience working as an archaeologist and project manager on a number of Aboriginal and European heritage projects across NSW, including water infrastructure and linear projects, residential development projects, renewable energy projects, and telecommunications projects. As part of these project Samantha has interacted with a diverse client base including Local Government, National Parks and Wildlife Service, Department of Primary Industry and Water, resource companies, architectural firms, engineering firms, and private developers.	
Maggie Butcher BSc/BA (Hons)	Maggie is one of the NSW Team Leaders, Senior Associate Heritage Consultant and Excavation Director with the Biosis Sydney office. Maggie has over eight years' experience as an archaeologist and has experience in conducting desktop assessments, archaeological survey and Aboriginal and historical excavation as well as consulting with Traditional Owners. She has also successfully managed a number of ACHAs to completion since her commencement at Biosis.	<ul style="list-style-type: none"> • Quality Assurance
Anthea Vella B.Arch, M.AHM	Anthea is a one of the NSW Team Leaders and Senior Heritage Consultant with over six years' experience. Anthea has experience in conducting Aboriginal and historical heritage assessments, surveys, archaeological test excavations and salvage excavations for a variety of projects including Aboriginal Due Diligence Assessments, ACHAs, Historical Heritage Assessments, Statements of Heritage Impact, Constraints Assessments, Aboriginal and Non-Aboriginal Heritage Management Plans, and Heritage Impact Assessments and permits for Aboriginal archaeology throughout NSW. Anthea possesses specialist skills in analysing Ground Penetrating Radar data. Anthea also possesses skills in desktop research, artefact analysis, project management, and reporting.	<ul style="list-style-type: none"> • Quality Assurance • Client communications • Technical advice
Mathew Smith BA/BSc (Hons)	Mathew is a Senior Heritage Consultant with over eight years' experience in the consulting industry. Mathew has extensive experience consulting with Aboriginal communities across NSW as well as completing Aboriginal due diligence assessments, Aboriginal cultural heritage assessments, heritage management plans and Aboriginal heritage Impact Permits, including both archaeological survey, excavation and monitoring field works. Mathew is a full member of the Australian Association of Consulting Archaeologists Inc. and is also recognised as a specialist in the recording and analysis of Aboriginal artefacts.	<ul style="list-style-type: none"> • Technical advice • Field investigation • Community consultation
Molly Crissell BA	Molly joined the Heritage team in the Biosis Newcastle office in 2021 and has over four years of experience as Heritage Consultant. Molly has had experience working as an archaeologist and project management on several Aboriginal projects across NSW and Western Australia. Since joining Biosis, Molly has gained experience in project management, Aboriginal community consultation, field survey, test excavations, salvage excavations, and report preparation throughout the Sydney, Illawarra and Hunter regions.	<ul style="list-style-type: none"> • Project management • Background research • Community consultation • Reporting
Bronte Baonza BA Arts	Bronte joined Biosis in 2023 as a Graduate Heritage Consultant with the Sydney Heritage team. During her time with Biosis, she has supported project managers in conducting archaeological surveys, test excavations, Aboriginal consultation, and background research.	<ul style="list-style-type: none"> • Community consultation

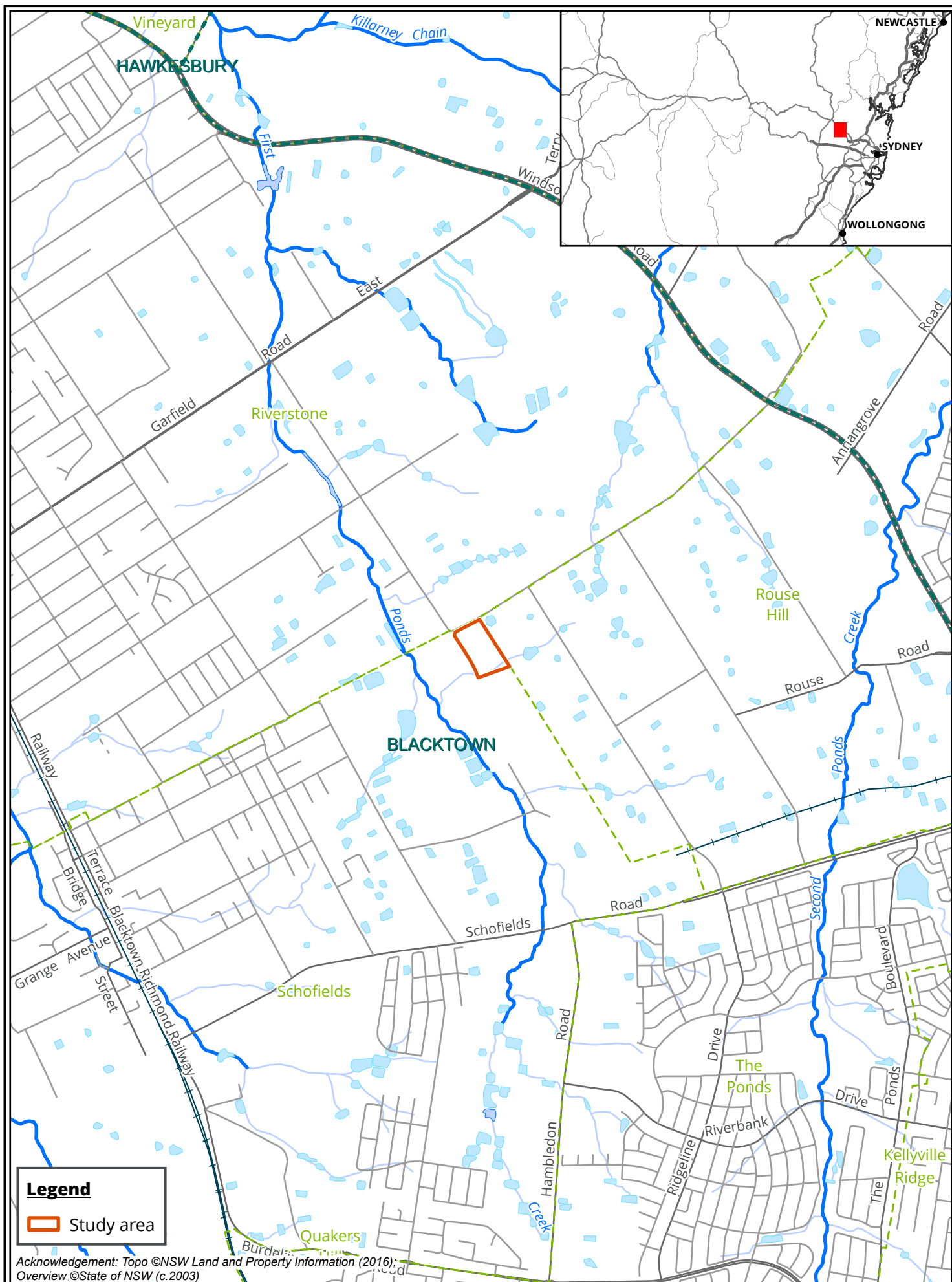
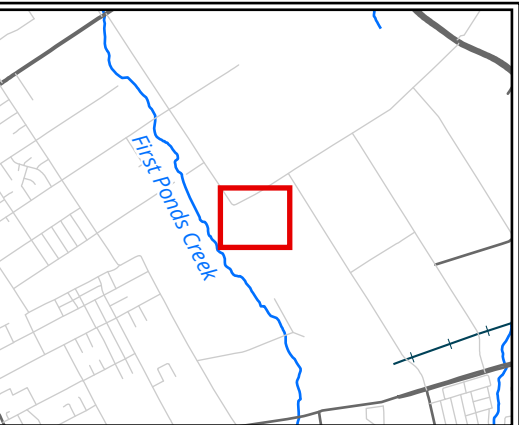


Figure 1 Location of the study area

Matter: 40105, Date: 15 October 2024,
 Prepared for: BB, Prepared by: AA., Last edited by: aabid
 Location: P:\40100s\40105\Mapping\
 40105_Tallawong_ACHA
 Layout: 40105_AR_F1_Locality

0 200 400 600 800 1,000
 Metres
 Scale 1:25,000@A4, GDA2020 MGA Zone 56





Legend



-  Study area
-  Lot

Figure 2 Study area detail

0 10 20 30 40 50
Metres
Scale: 1:1,500 @ A3
Coordinate System: GDA2020 MGA Zone 56



Matter: 40105, Date: 15 October 2024,
Prepared for: BB, Prepared by: AA, Last edited by: aabid
Location: P:\401005\40105\Mapping\
40105_Tallawong_ACHA,
Layout: 40105_AR_F2_StudyArea

2 Proposed activity

The proposed activity is for the construction and operation of a new high school known for Schofields and Tallawong. The new high school will accommodate up to 1,000 students. The school will provide 49 PTS, and three STS across three buildings.

The buildings will be three-storey in height and will include teaching spaces, specialist learning hubs, a library, administrative areas and a staff hub. Additional core facilities are also proposed including a standalone school hall, a carpark, as pick up and drop off zone along Nirmal Street, two sports courts and a sports field.

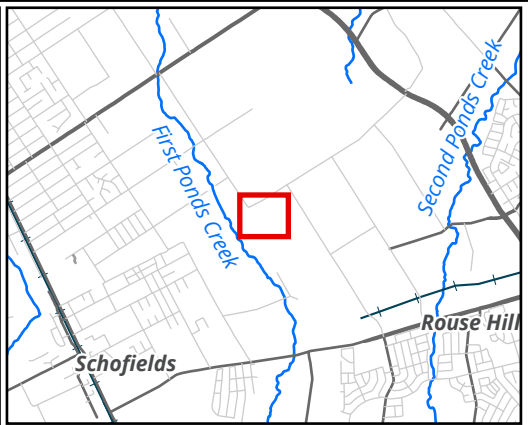
Specifically, the proposal involves the following:

- Three learning hubs (three-storeys in height) accommodating 49 general teaching spaces and three SLUs.
- Other core facilities including amenities, library, staff hub and administrative areas.
- Standalone school hall.
- Separate carpark with 72 spaces.
- Kiss and drop zone along Nirmal Street.
- Open play space including sports courts and sports field.
- Public domain works.

The proposed site access arrangements are as follows:

- Main pedestrian entrance to be located off Nirmal Street.
- Kiss and drop zone proposed along Nirmal Street.
- Onsite parking access via Nirmal Street.

Figure 3 provides an extract of the proposed site plan.



Legend
Study area

Figure 3 Proposed activity

0 10 20 30 40 50
Metres
Scale: 1:1,500 @ A3
Coordinate System: GDA2020 MGA Zone 56



Matter: 40105, Date: 18 December 2024,
Prepared for: BB, Prepared by: AA, Last edited by: aabid
Location: P:\401005\40105\Mapping\
40105_Tallawong_ACHA,
Layout: 40105_AR_F3_ProposedActivity

3 Desktop assessment

The desktop assessment involves researching and reviewing existing archaeological studies and reports relevant to the study area and surrounding region. This information is combined to develop an Aboriginal site prediction model for the study area, and to identify known Aboriginal sites and/or places recorded in the study area. This desktop assessment has been prepared in accordance with Requirements 1 to 4 of the Code.

3.1 Landscape context

It is important to consider the local environment of the study area any heritage assessment. The local environmental characteristics can influence human occupation and associated land use and consequently the distribution and character of cultural material. Environmental characteristics and geomorphological processes can affect the preservation of cultural heritage materials to varying degrees or even destroy them completely. Lastly, landscape features can contribute to the cultural significance that places can have for people.

3.1.1 Topography and hydrology

The study area is located within the Cumberland Plain, which is a broad and shallow basin that stretches westwards from Parramatta to the Hawkesbury-Nepean River and southwards from Windsor to Thirlmere (S. M. Bannerman & Hazelton 1990). The study area is contained within the Wianamatta Group geological formation, specifically the Ashfield Shale, Bringelly Shale, and Minchinbury Sandstone geological units. (Figure 4) (S. M. Bannerman & Hazelton 1990, p.2). The Bringelly Shale formation is primarily composed of shale, with occasional calcareous claystone, laminate, and coal (S. M. Bannerman & Hazelton 1990, p.28). Topographically the study area is situated within a ridge landform, surrounded by gently sloping landscapes (Figure 5).

Stream order is recognised as a factor which assists in the development of predictive modelling in Sydney Basin Aboriginal archaeology, and has seen extensive use in the Sydney region, most notably by Jo McDonald Cultural Heritage Management (Jo McDonald Cultural Heritage Management 2000, Jo McDonald Cultural Heritage Management 2005, JMCHM 2005, Jo McDonald Cultural Heritage Management 2006, Jo McDonald Cultural Heritage Management 2008). Predictive models, which have been developed for the region, have a tendency to favour higher order streams as having a higher potential for campsites as these types of streams would have been more likely to provide a stable source of water and by extension, other resources which would have been used by Aboriginal groups.

The stream order system used for this assessment was originally developed by Strahler (1952). It functions by adding two streams of equal order at their confluence to form a higher order stream, as shown in Photo 1. As stream order increases, so does the likelihood that the stream would be a perennial source of water.

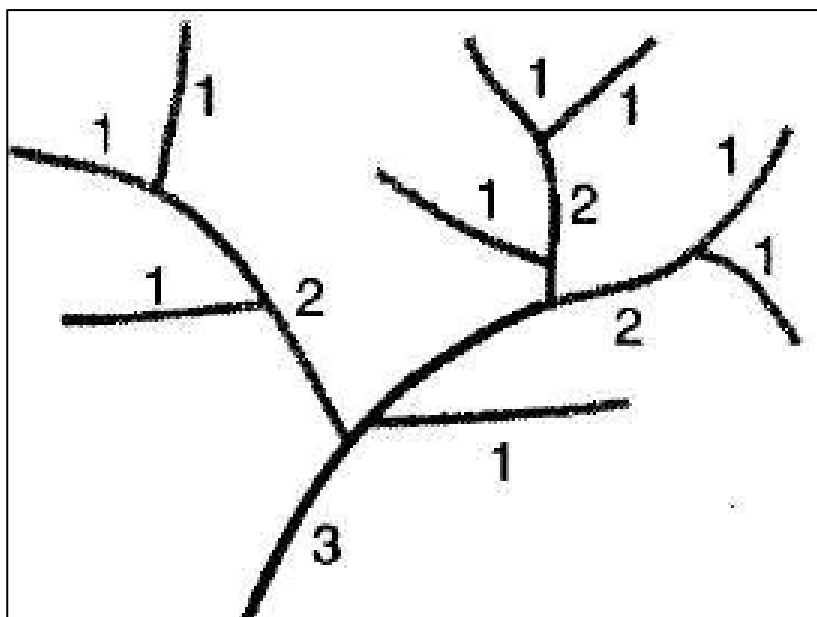


Photo 1 Diagram showing Strahler stream order (Ritter et al. 1995, p.151)

Several permanent fresh water sources are located within close proximity to the study area. A first order non perennial water source is located in the southern portion of the study area which flows easterly. This water course is a tributary of First Ponds Creek, a third order perennial water course located 240 metres to the west of the study area. Another first order non perennial water course is located 275 metres north of the study area, which also flows easterly from First Ponds Creek (Figure 5).

3.1.2 Soil landscapes

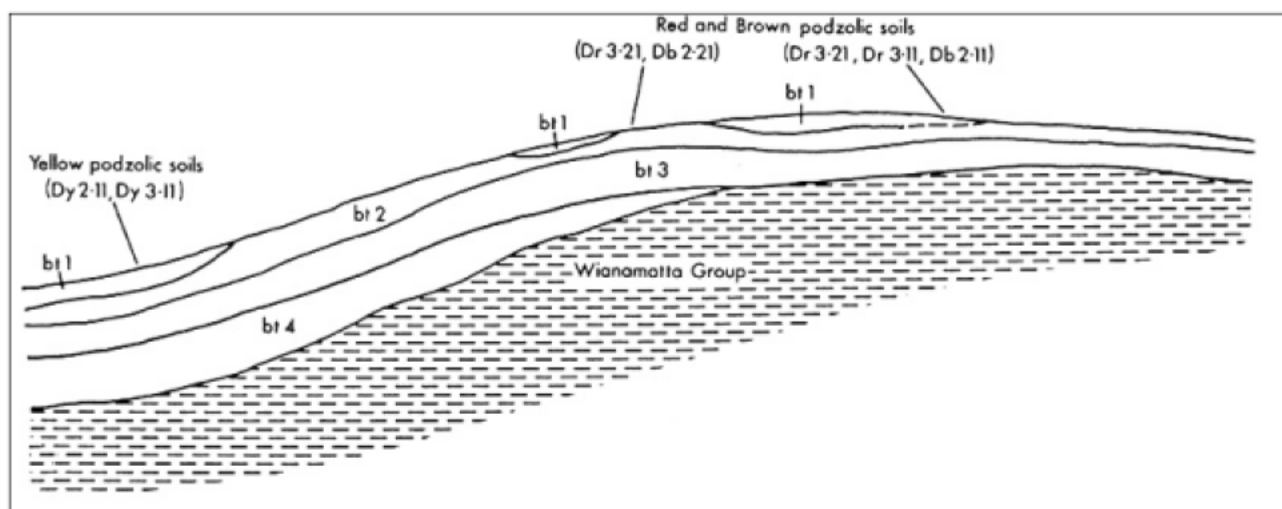
The study area is occupied by the Blacktown soil landscape (Figure 6). This landscape is a residual soil landscape and consists of gently undulating rises, broad rounded crests and gently inclined slopes with a gradient of less than 5%. Local relief within the Blacktown soil landscape is up to 30 metres and rocky outcropping is absent. Dominant soils consist of shallow to moderately deep (<100 centimetres) red and brown podzols on crests and in well drained topographies, and deep (150-300 centimetres) yellow podzolic soils and soloths on lower slopes and drainage lines (S.M. Bannerman & Hazelton 1990, p.28). The soil characteristics of this landscape are described in Table 2 and Photo 2.

Due to their age and slow accumulation, residual soil landscapes have reasonable potential to contain archaeological deposits in an open context, such as stone artefacts derived from occupation sites. Other occupational evidence might include scarred trees where remnant vegetation occurs. However, the slow accumulation and high impact of extensive land clearing (usually associated with pastoral and civic development) often results in poor preservation of archaeological material.

Subsurface artefacts in the Blacktown soil landscape are typically located in the A horizon topsoil. It is likely that any subsurface artefacts would be identified in the upper two stratigraphic profiles (*bt1* and *bt2*). The soils described in Table 2 align closely with profiles described in nearby excavations at the Rouse Hill Anglican College, on the northern side of Rouse Road, approximately 900 metres south-east of the study area (Stephanie Garling Archaeological Consulting (SGAC) 2000, p.45). The descriptions given by Stephanie Garling Archaeological Consulting (2000) suggest that the *bt1* profile had largely eroded away from the assessment area, and that the majority of the artefacts identified came from the *bt2* profile. Should these profiles remain intact within the study area, there is potential that artefact will be located within it.

Table 2 Blacktown soil landscape characteristics (S. M. Bannerman & Hazelton 1990, pp.29–30)

Soil material	Description
bt1—Friable brownish black loam	This is a friable brownish black loam to clay loam with moderately pedal subangular blocky (2 – 20 mm) structure and rough-faced porous ped fabric. This material occurs as topsoil (A horizon). Colour is brownish black (10YR 2/2) but can range from dark reddish brown (5YR 3/2) to dark yellowish brown (10YR 3/4). Rounded iron indurated fine gravel-sized shale fragments and charcoal fragments are sometimes present. Roots are common.
Bt2—Hardsetting brown clay loam	This is a brown clay loam to silty clay loam which is hardsetting on exposure or when completely dried out. It occurs as an A2 horizon. This material is water repellent when extremely dry. Colour is dark brown (7.5YR 4/3) but can range from dark reddish brown (2.5YR 3/3) to dark brown (10YR 3/3). Platy, iron indurated gravel-sized shale fragments are common. Charcoal fragments and roots are rarely present.
Bt3—Strongly pedal, mottled brown light clay	This is a brown light to medium clay with strongly pedal polyhedral or sub-angular to blocky structure and smooth-faced dense ped fabric. This material usually occurs as subsoil (B horizon). Colour is brown (7.5YR 4/6) but may range from reddish brown (2.5YR 4/6) to brown (10YR 4/6). Frequent red, yellow or grey mottles occur often becoming more numerous with depth. Fine to coarse gravel-sized shale fragments are common and often occur in stratified bands. Both roots and charcoal fragments are rare.
Bt4—Light grey plastic mottled clay	This is a plastic light grey silty clay to heavy clay with moderately pedal polyhedral to subangular blocky structure and smooth faced dense ped fabric. This material usually occurs as deep subsoil above shale bedrock (B3 or C horizon). Colour is usually light grey (10YR 7/1) or, less commonly, greyish yellow (2.5YR 6/2). Red, yellow or grey mottles are common. Strongly weathered ironstone concretions and rock fragments are common. Gravel-sized shale fragments and roots are occasionally present. Charcoal fragments are rare.

**Photo 2 Schematic cross-section of Blacktown soil landscape illustrating the occurrence and relationship of the dominant soil materials (Source: S. M. Bannerman & Hazelton 1990, pp. 29–30).**

3.1.3 Landscape resources

The original woodland and open-forest supported by the Blacktown soil landscape were dominated by Forest Red Gum *Eucalyptus tereticornis*, Narrow-leaved Iron-bark *E. crebra*, Grey Box *E. moluccana* and Spotted Gum *E. maculata* with Woollybutt *r. longifolia* as understorey (S. M. Bannerman & Hazelton 1990, p.29).

Plant resources were used in a variety of ways. Fibres were twisted into string which was used for many purposes including the weaving of nets, baskets and fishing lines. String was also used for personal adornment. Bark from eucalypts was used in the provision of shelter; a large sheet of bark being propped against a stick to form a gunyah (Attenbrow 2002). Swamp oak bark could be used for the making of canoes, and smooth-barked apple for the making of baskets and bowls.

Common fauna in the area include Common Ringtail Possum *Pseudocheirus peregrinus*, Common Brushtail Possum *Trichosurus vulpecula*, Gould's Wattled Bat *Chalinolobus gouldii*, Southern Myotis *Myotis Macropus*, Australian Raven *Corvus coronoides*, Noisy Miner *Manorina (Myzantha) melanocephala*, Magpie-lark *Grallina cyanoleuca*, and Australian Magpie *Gymnorhina tibicen* (Atlas of Living Australia 2021).

As well as being important food sources, animal products were also used for tool making and fashioning a myriad of utilitarian and ceremonial items. For example, tail sinews are known to have been used to make fastening cord, while 'bone points', which would have functioned as awls or piercers, are often part of the archaeological record. Animals such as Brushtailed Possums were highly prized for their fur, with possum skin cloaks worn fastened over one shoulder and under the other (Attenbrow 2002).

Raw material sources in the vicinity of the study area include silcrete quarries at Riverstone and Plumpton Ridge, which are located approximately 5 kilometres to the west (Archaeological & Heritage Management Solutions 2015, p.18).

While the diverse natural environment would have provided vast and plentiful floral and faunal resources and the temperate climate would have made the area suitable for year-round occupation, the distance of the study area from permanent water sources would have detracted from its appeal as a long-term occupation site.

3.1.4 Land use history

The land within the study area was originally granted Richard Rouse, a public servant and settler of 450 acres on 8 October 1816. The land was utilised for grazing and agricultural purposes. Historical aerial imagery allows for modern developments and land use to be identified within the study area. An aerial dated to 1947 (Photo 3) displays the study area and the vicinity as relatively undisturbed, except for minor vegetation clearance. The study area remained undeveloped until the 1950s, which shows the development of roads in the vicinity of the study area. By the 1960s (Photo 4), a residential structure can be observed within the western portion of the study area, with a track leading from the structure towards the south. Minimal change is observed from the 1965 (Photo 4) to the 1970 (Photo 5) aerial. In 1986 (Photo 6), a residential property can be observed in the western portion of the study area with a driveway running south from the property. A track running east from the property can also be observed. From 1986 to 2005 (Photo 7), no changes can be observed within the study area. In the most recent aerial, the residential property is no longer within the western portion and the study area is vacant (Photo 8).



Photo 3 Aerial imagery dated to 1947 with the study area outlined in orange (Source: NSW Spatial Services)



Photo 4 Aerial imagery dated to 1965 with the study area outlined in orange (Source: NSW Spatial Services)



Photo 5 Aerial imagery dated to 1970 with the study area outlined in orange (Source: NSW Spatial Services)



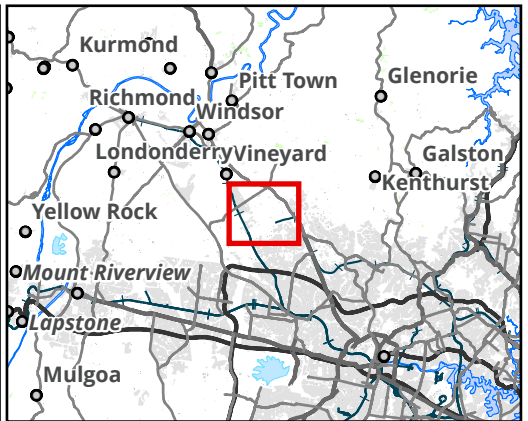
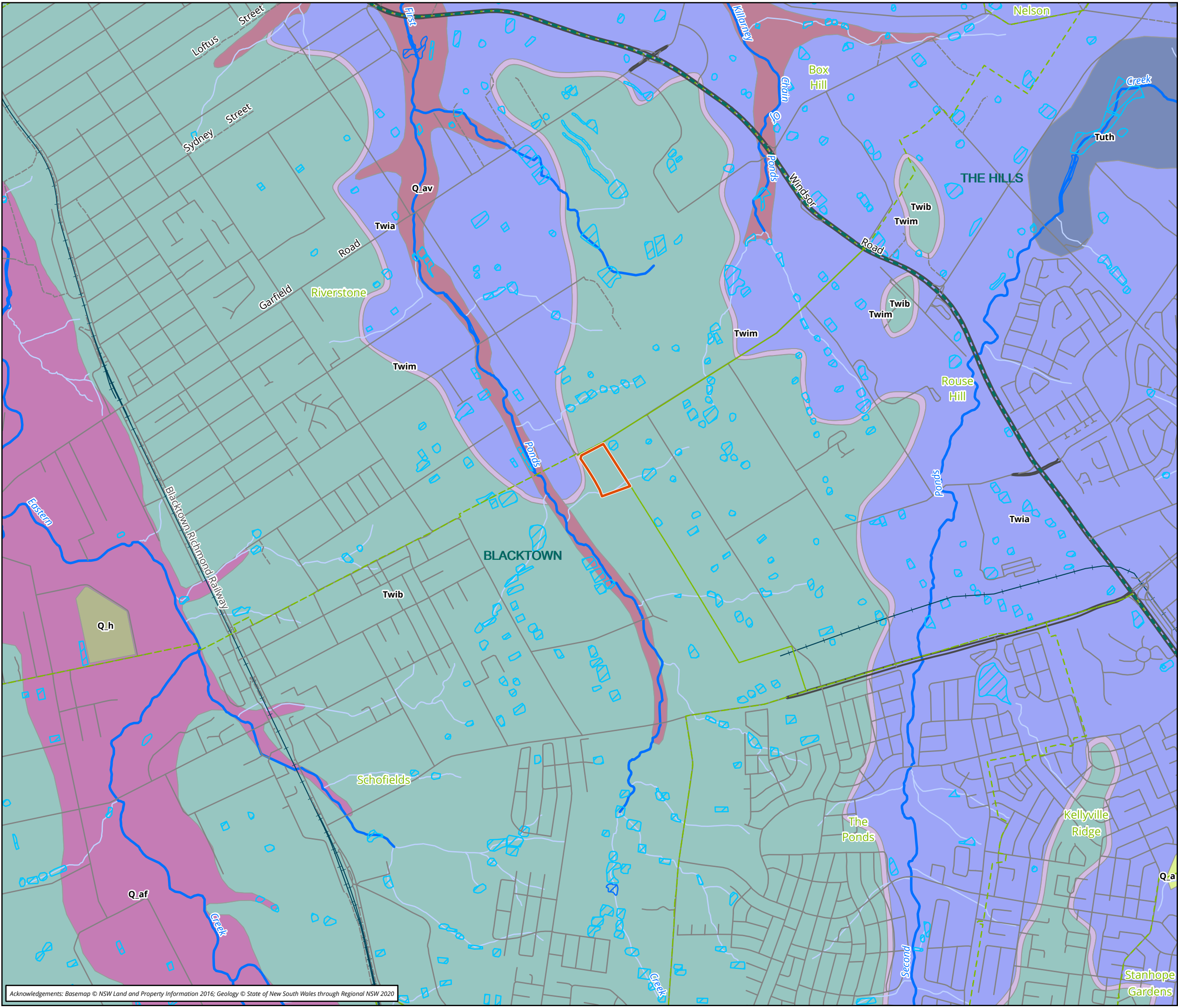
Photo 6 Aerial imagery dated to 1986 with the study area outlined in orange (Source: NSW Spatial Services)



Photo 7 Historical aerial dated to 2005 with the study area outlined in orange (Source: NSW Spatial Services)



Photo 8 Present day historical aerial with the study area outline in orange (Source: NSW Spatial Services)



Legend

Study area

Geological units

- Q_a, Alluvium
- Q_af, Alluvial floodplain deposits
- Q_av, Alluvial valley deposits
- Q_h, Anthropogenic deposits
- Tuth, Hawkesbury Sandstone
- Twia, Ashfield Shale
- Twib, Bringelly Shale
- Twim, Minchinbury Sandstone

Figure 4 Geological units in the vicinity of the study area

0 200 400 600 800 1,000 N

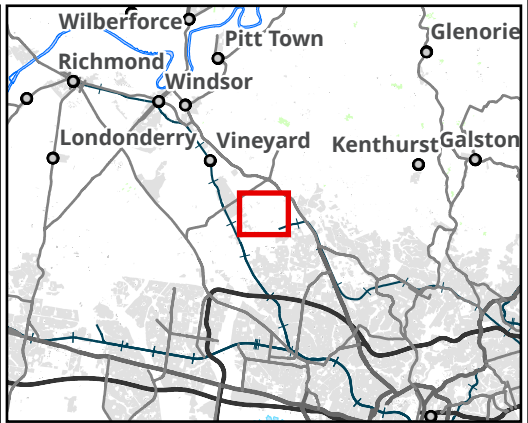
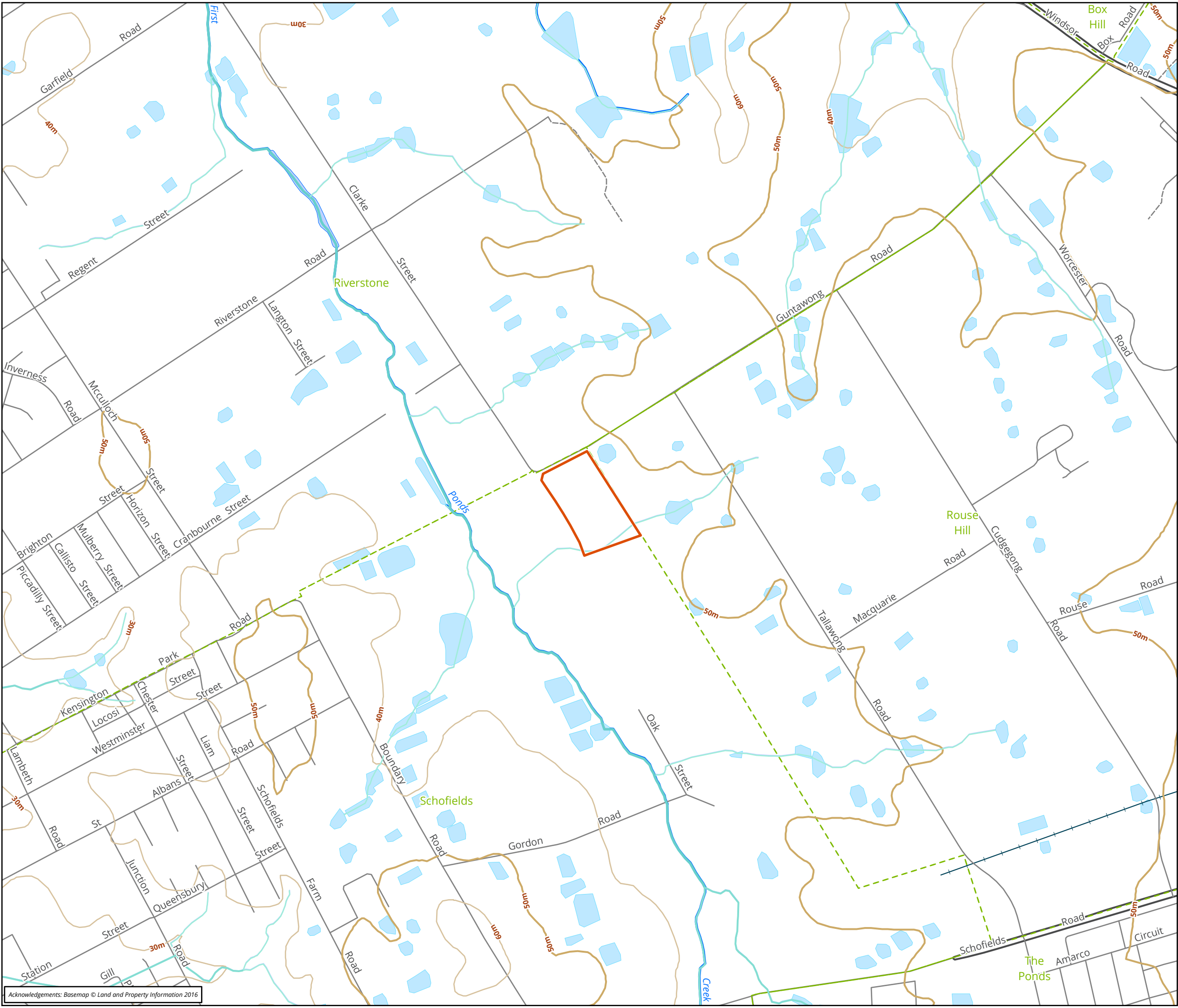
Metres

Scale: 1:20,000 @ A3

Coordinate System: GDA2020 MGA Zone 56

biosis
APEM Group

Matter: 40105, Date: 15 October 2024,
Prepared for: BB, Prepared by: AA, Last edited by: aabid
Location: P:\401005\40105\Mapping\
40105_Tallawong_ACHA,
Layout: 40105_AR_F4_Geology



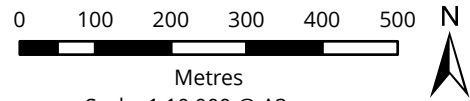
Legend

- Study area
- Contour (10m)

Strahler Order

- 1
- 2
- 3

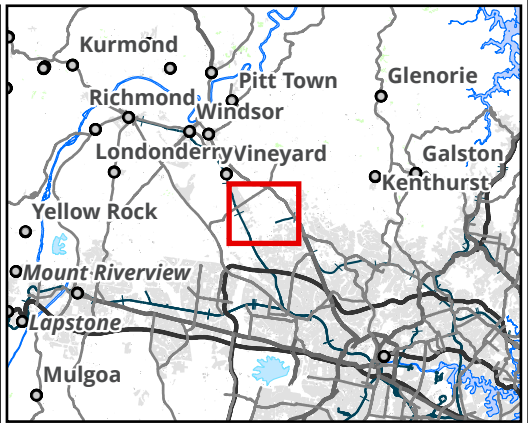
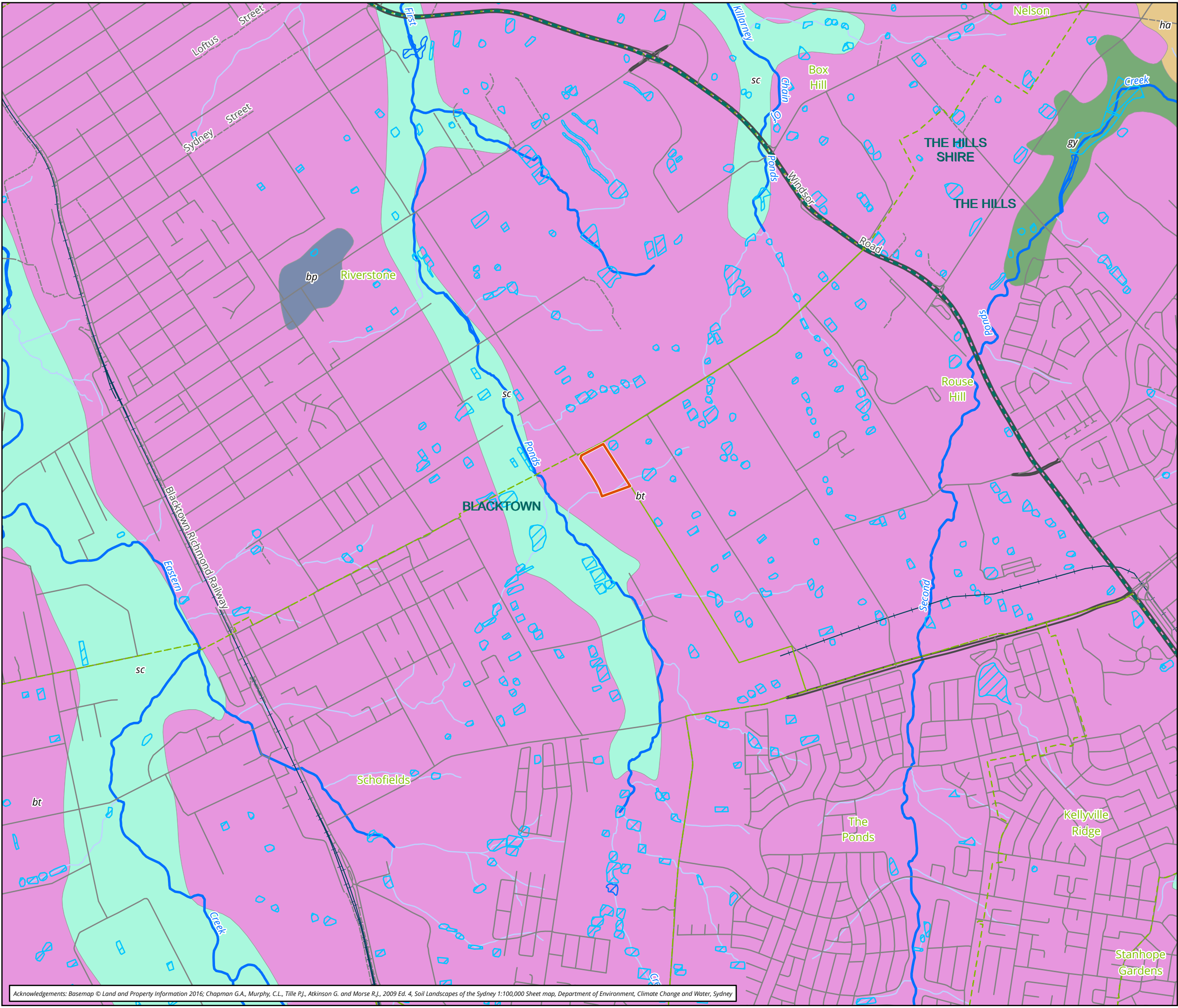
Figure 5 Hydrology and topography in the vicinity of the study area



Scale: 1:10,000 @ A3
Coordinate System: GDA2020 MGA Zone 56

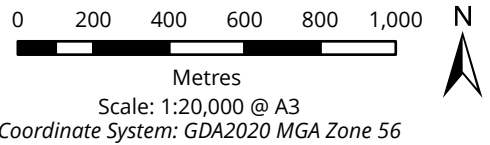


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40105_Tallawong_ACHA,
Layout: 40105_AR_F5_Hydrology



- Legend**
- Study area
 - Soil landscape units**
 - bp - BERKSHIRE PARK
 - bt - BLACKTOWN
 - gy - GYMEA
 - ha - HAWKESBURY
 - sc - SOUTH CREEK

Figure 6 Soil landscapes in the vicinity of the study area



Matter: 40105, Date: 15 October 2024,
Prepared for: BB, Prepared by: AA, Last edited by: aabid
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Layout: 40105_AR_F6_Soils

3.2 Previous archaeological work

A large number of cultural heritage surface (surveys) and sub-surface (excavations) investigations have been conducted throughout the region of NSW in the past 40 years. There has been an increasing focus on cultural heritage assessments in NSW due to ever increasing development, along with the legislative requirements for this work and greater cultural awareness of Aboriginal cultural heritage.

3.2.1 Regional overview

Dominic Steele Consulting Archaeology (2003) undertook test excavations at Wallgrove Road, Eastern Creek; approximately 13.5 kilometres south of the current study area. The predictive modelling employed by Steele is of relevance to the Cumberland Plain generally and draws on assessments made by JMCHM and AMBS in the Rouse Hill Area. The assessment built on a number of previous surveys conducted between 1980 and 2002 within the assessment area. Steele noted a JMCHM study from 1997, which had stated that surface artefacts were not an effective way to characterise archaeological sites, and that at the time of writing:

- 17 out of the 61 excavated sites on the Cumberland Plain had no artefacts present on the surface prior to excavation. However, most areas with sparse or no surface manifestations contained considerable archaeological deposits.
- The ratio of recorded surface to excavated artefacts is 1:25 across the Plain.
- None of the excavated sites could be properly characterised on the basis of their surface artefacts alone.
- Open campsites are located in all landscapes on the Cumberland Plain. The predominance of sites recorded along creek banks is likely to be indicative of surface visibility conditions and taphonomic factors, rather than the human distribution of artefacts across the landscape (DSCA 2003, pp.19–20).

This statement notes a number of issues with predictive models that base their assessment of subsurface potential based entirely on the presence or absence of surface artefacts. There may be a correlation between artefact density and site function.

A total of 20, 1 metre squared pits were excavated using a backhoe, and sieved through nested 5 and 2.5 millimetre sieves. The deposit encountered tended to be relatively shallow, with most pits not exceeding 20 centimetres. A total of 38 artefacts were identified by surface survey and excavation, with a density characterised by Steele as extremely low, and the area was interpreted as being visited sporadically, and not the site of any sort of knapping or camping, but rather a general background scatter.

The deposit consisted primarily of silcrete, with quartz, tuff, and volcanic rock present in much lesser quantity. The vast majority of the deposit was identified as manuport, with some flake and core fragments present, and one potential broken axe.

Biosis (2010) conducted test excavations approximately 16 kilometres south-west of the current study area in advance of the construction of a link road between Erskine Park Road and Old Wallgrove Road, Erskine Park. A total of 113, 1 square metre pits were excavated across four sites. Two of these sites were the locations of surface finds, while the other two were identified potential archaeological deposits (PADs).

- AHIMS 45-5-3843/RCIF 1 was originally recorded as an isolated artefact site, as one silcrete artefact was found on the edge of a dam during field survey. During test excavations, 16 pits were excavated in a U shape around the dam, recovering eight artefacts from four of the pits. It was noted that the land had undergone some disturbance as a result of past land use activities.

- AHIMS 45-5-3842/EPLR 1 was originally recorded as a low density artefact scatter consisting of two silcrete artefacts located on the northern and southern bank of a shallow tributary creek line. A total of 19 pits were excavated at this site, recovering three artefacts across two pits. Again, the land had seen disturbance from ploughing, stock movement, vehicle movement and fence construction.
- AHIMS 45-5-3062/EP Potential Archaeological Deposit (PAD) 1 east was the portion of AHIMS 45-5-3062/EP PAD 1 located on the east side of Ropes Creek. Sub-surface testing was carried out on the floodplain and a slight rise overlooking the floodplain. 27 test pits were excavated in this area, and a total of 52 artefacts were recovered from 10 pits. As with the other excavation units, it had seen disturbance from past land use activities such as grazing and vehicle movement.
- AHIMS 45-5-3062/EP PAD 1 west was the portion of AHIMS 45-5-3062/EP PAD 1 located on the west side of Ropes Creek, on the banks and floodplain of the creek. 51 test pits were excavated, with a total of 289 artefacts were found in 29 pits, almost all within the top 20 centimetres. Two pits contained artefacts between 20 and 30 centimetres.

A total of 352 artefacts were recovered during excavations, with the majority being comprised of silcrete, along with a number of quartz artefacts. It was noted during excavation that sources of silcrete are naturally occurring within 3 kilometres of the assessment area.

3.2.2 Local overview

A number of Aboriginal cultural heritage investigations have been conducted within the region (within approximately 10 kilometres of the study area). Most of these investigations were undertaken as part of development applications and included surface and sub-surface investigations. These investigations are summarised below.

McDonald (1986) undertook a preliminary archaeological assessment of the proposed Regional Waste Disposal Depot at Schofields, located approximately 4.6 kilometres west of the study area. The assessment area was located nearby Plumpton ridge, which previous studies have identified to be used as a silcrete source for stone tool manufacture. Five, 50 by 50 centimetre test pits were excavated on ridges and gullies located within the assessment area. It was identified that surface scatters of artefacts were located across the entire area, concentrated towards the ridge top, reducing density with distance from the ridge. Disturbance from ploughing was also identified. Raw material types included predominantly silcrete with some quartz, mudstone, volcanic and petrified wood in the form of blade cores, backed artefacts, flakes and grinding stones. Further investigation was recommended.

Australian Museum Business Service (AMBS 2000) undertook salvage excavations at Mungerie Park located approximately 3.4 kilometre south-east of the study area. These excavations followed a previous 1998 survey that located numerous sites, including: rock shelters, grinding grooves and rock art sites. Two new sites were also identified during the survey: a group of grinding grooves and artefact scatter. Excavations undertaken in 2000 totalled of 211 square metres in a mixture of transects, patterned test pit areas, and open excavations. From this sample, a total of 5,504 artefacts were recovered, giving an average artefact density of 26.1 artefacts per metre squared.

The results of this excavation led to the characterisation of three zones of complexity. These are areas where activities took place which are located in relation to environmental focal points, in this case, grinding groove sites and Caddies Creek (Australian Museum Business Service 2000):

- A “complex zone”, where overlapping knapping floors and high density concentrations are present due to the repeated occupation and use of the area with closest access to resources and facilities.

- A “dispersed zone”, where knapping floors and/or activity areas are spatially discrete due to less frequent occupation of those areas, or the positioning of activities requiring a measure of separation from a main camp.

A “sparse zone” comprising a consistently low density distribution of artefacts likely to have resulted from discard in the context of use (or loss) rather than manufacture.

Stephanie Garling Archaeological Consulting (SGAC 2000) completed test excavations in two areas of potential (AHIMS 45-5-2573/RHAC2 and AHIMS 45-5-2574/RHAC3) located approximately 1 kilometre south-east of the study area. Testing was completed in advance of the construction of the Rouse Hill Anglican College. The program of testing was completed following an archaeological survey which identified one stone artefact and two PADs. These areas were assessed as having moderate to high potential based on:

- Close proximity to food and water sources in the form of Second Ponds Creek.
- Gentle hillslopes in the area, which formed a potentially suitable camping location.
- The presence of previously excavated sites in the vicinity, which had contained significant deposits.
- Predictive modelling, which suggested that higher densities of artefactual material may be present within the study area.
- A lack of disturbance identified within the study area.
- The presence of the study area on Shale Lowlands, which had previously been assessed as a threatened landscape on the Cumberland Plain in terms of disturbance.

Stephanie Garling Archaeological Consulting also brought together background research from various sources relating to sources of raw artefact material in relation to the assessment area Table 3. Test excavations at both sites identified subsurface deposits, with the results summarised in Table 4.

Table 3 Distance to known sources of raw material for artefacts from SGAC assessment area

Nearest sources of surface stone	Silcrete	Silicified tuff	Petrified wood	Quartz	Quartzite	Igneous
Hawkesbury sandstone	-	-	-	12	-	-
Scheyville	10	10	-	-	10	-
South Windsor	-	11	-	-	11	-
Nepean River Agnes Banks	-	21	-	21	21	21
Riverstone	3	-	4	4	-	-
Echo vale	8	8	8	-	8	8
Sirius Place	-	12	-	12	12	-
Marsden Park	6.5	-	6.5	-	6.5	-
Plumpton Ridge	6	-	6	-	-	-
Bells Creek 2	8	-	-	-	-	-
ADI Dunheved (St Marys)	13	13	13	-	13	-
Plumpton Park	9.5	-	-	-	-	-
Blacktown 1	9	-	-	-	-	-

Table 4 Results of the subsurface test excavations

Site	Extent of excavations	Number of artefacts recovered	Density (artefact/metres squared)
AHIMS 45-5-2573/RHAC2	32 metres squared Six 1 x 1 metre test pits Two open areas	942	29.44
AHIMS 45-5-2574/RHAC3	15 metres squared Fifteen 1 x 1 metre test pits	7	0.47

Within AHIMS 45-5-2573/RHAC2, localised knapping floors were identified, with the largest containing 812 artefacts. Excavations in this area identified a relatively intact knapping floor with a central area of high density and a lower density peripheral area. It was noted that a high number of backed artefacts (47) were identified in the assemblage, and that the primary raw material was silcrete. The site was assessed as having moderate significance, as while a large number of artefacts were recovered, it was considered that the deposit was relatively unstratified, and as such as unable to provide a chronology for Aboriginal occupation in the area (Stephanie Garling Archaeological Consulting (SGAC) 2000, p.80).

The low density of artefacts identified at AHIMS 45-5-2574/RHAC3 led to it being classed as 'background scatter' with it being considered unlikely that camping or knapping took place at this site. It was suggested that local Aboriginal groups may have favoured the lower hillslope closer to Second Ponds Creek. This site was classed as having low potential.

Jo McDonald Cultural Heritage Management Pty Ltd (2002) undertook an assessment of Areas 2, 5, 20, 22, and 24b of the Rouse Hill Infrastructure Project in the Second Ponds Creek Area, which contains the study area. This survey incorporated the current study area, which forms a part of Area 20. The initial sections of the assessment identified the majority of Area 20 as being in a zone of 'lesser' disturbance (JMCHM 2002, p.14). The regional predictive modelling used for this study was based on work undertaken throughout the 1990s and early 2000s in the Cumberland Plain, predominantly throughout the Rouse Hill area. It was stated that:

"It is predicted that the size (density and complexity) of archaeological features will vary according to the permanence of water (i.e. ascending stream order), landscape unit and proximity to lithic resources in the following way:

- In the headwaters of upper tributaries (i.e. first order creeks) archaeological evidence will be sparse and represent little more than a background scatter.*
- In the middle reaches of minor tributaries (second order creeks) will be archaeological evidence for sparse but focussed activity (e.g. one-off camp locations, single episode knapping floors).*
- In the lower reaches of tributary creeks (third order creeks) will be archaeological evidence for more frequent occupation. This will include repeated occupation by small groups, knapping floors (perhaps used and reused), and evidence of more concentrated activities.*
- On major creek lines, such as the lower reaches of Second Ponds (third order) and Caddies Creeks (fourth order), there will be archaeological evidence for more permanent or repeated occupation. Sites will be complex and may even be stratified.*
- Creek junctions may provide foci for site activity; the size of the confluence (in terms of stream ranking nodes) could be expected to influence the size of the site.*
- Ridgetop locations between drainage lines will usually contain limited archaeological evidence, although isolated knapping floors or other forms of one-off occupation may be in evidence in such a location.*

- *Naturally outcropping silcrete will have been exploited and evidence for extraction activities (decortication, testing and limited knapping) would be found in such locations.*
- *Sites in close proximity to an identified stone source would cover a range of size and cortex characteristics. As one moves away from the resource, the general size of artefacts in the assemblage should decrease, as should the percentage of cortex. The increasing number of new (in particular) silcrete sources has made the testing of the distance decay model (Dallas & Witter 1983) more difficult, and suggests that this model is a poor mechanism for explaining raw material preferences around the Plain.” (JMCHM 2002, pp.15–16).*

This predictive model, and variations upon it, has formed the base standard for predictive modelling in the Cumberland Plain region for the past decade, with a large number of reports drawing on it to develop their own predictions of sites that will be present in a given area. Stream order is given preference as an indicator of permanent, reliable water courses, which in the Cumberland Plain occurs at the confluence of two second or third order creeks (JMCHM 2002, p.12).

The local predictive model stated that surface artefacts (predominantly silcrete) were likely to occur in open locations on shale bedrock but were unlikely to be present in large numbers unless in a disturbed context. Areas of PAD should be marked based on low disturbance caused by previous land use. Shelter sites would not be found, but open grinding grooves may be found in sandstone or shale/sandstone transition areas. There was some potential for scarred trees to occur in areas of original vegetation.

The survey identified four new sites within the assessment area, as well as 18 previously recorded sites and nine PADs (which were not recorded as sites in the AHIMS register). Of these sites, four were isolated finds, seven were open camp sites, 10 were open camp sites with PADs, and one was an open camp site with grinding groove. The majority of these sites were located in the Ashfield Shale, or Quaternary Alluvium geological formations. The majority of artefacts identified by survey were made of silcrete.

One site (RH/SP17) was identified adjacent to the study area by this survey, designated as an open site with PAD. The site consisted of six silcrete artefacts and one ‘other’ artefact associated with vehicle track exposure to the south of the corner of Rouse Road and Terry Road. The area of PAD was defined by road and property boundaries in the area. The site was assessed as having mixed but good potential (JMCHM 2002, p.67). Recommendations for sites of this level of potential in areas threatened by development included test excavation to establish their actual level of significance. This site was further investigated by KNC (2010).

AECOM (2008) undertook an Aboriginal heritage assessment for the Alex Avenue and Riverstone Growth Centre Precincts for ENSR Australia Pty Ltd. The study involved the assessment of two proposed growth precincts identified as Riverstone and Alex Avenue. During the field investigation 37 Aboriginal sites were identified adjacent to First Ponds Creek and upon the large ridgeline which transects through the centre of the two assessment areas. The assessment identified six sites with high archaeological significance, four sites with moderate archaeological significance and 27 sites of low archaeological significance. Two sites were identified of high cultural significance.

The investigation identified the AHIMS 45-5-4311/A7 Archaeological Complex which is located to the west of the current study area. The site consists of an artefact scatter and archaeological deposit located on lower slopes and flats adjacent to First Ponds Creek. The site is approximately 300 metres by 150 metres and consists of several artefact scatters including, RV27, RV28 and A6. The assessment also identified the A8 Archaeological Complex which is a continuation of AHIMS 45-5-4311/ A7 Archaeological Complex which was disrupted due to market gardening activities.

Kelleher Nightingale Consulting (KNC) (2010) undertook an Aboriginal heritage assessment of the Area 20 precinct of the North West growth centre for the NSW Department of Planning. The study involved broad

assessment and survey of the area to inform precinct planning, zoning, and layout. Based on the results of previous assessments in the vicinity, KNC developed a predictive model which stated the following (p.18):

- Stone artefacts are likely to occur across the entire assessment area.
- The highest artefact numbers and densities will be associated with the margins of Second Ponds Creek.
- Artefact densities are likely to be quite low on the higher upper slope and crest landforms within Area 20. Although artefacts may not be observed on the surface during field survey, they are likely to be present in a subsurface context.
- The subsurface archaeological context across Area 20 would not necessarily have been heavily disturbed by ploughing and/or vegetation clearance.

This model was based on the findings of (AMBS 2000), (JMCHM 2002), and a number of other surface and subsurface investigations that have taken place in the vicinity of Area 20. It noted that the results of multiple excavations had indicated that low artefact densities were consistently recorded on upper slopes and crests in the area (Kelleher Nightingale Consulting 2010, p.17). It was also noted by KNC that previous predictive models had placed a large emphasis on the idea that more complex sites would be identified in close proximity to streams. However, the works undertaken by Therin (2004), demonstrated that artefacts occurred in a range of landforms. Both assessments agreed that the highest artefact densities were located in the margins of Second Ponds Creek.

During the survey to test the modelling, it was identified that the majority of sites were located on lower and mid slopes, with some being present on upper slopes and crests as well as one on a creek flat. A total of 19 artefact sites and seven PADs were identified during the survey.

The results of the survey largely confirm the predictive statements made in the predictive model. Stone artefacts formed the majority of identified sites, and were located across a variety of landforms, as well as being well distributed throughout the assessment area. The majority of sites were located away from upper slopes and crests, and those that were located on these landforms were low density scatters and isolated finds (although it is noted that all scatters were of low density). The sites with the largest artefact counts were located within 150 metres of Second Ponds Creek. As the assessment did not involve subsurface investigations, it is not possible to judge the accuracy of that portion of the predictive model.

White & McDonald (2010) undertook a review of previous work in the Rouse Hill development area, including the study area, discussing lithic artefact distribution from previous excavations. The study considered a number of factors including stream order, distance from water, landform, aspect, and distance to silcrete sources. As a result of the assessment, the following statements were made:

- Stream Order: water supply was a significant factor influencing Aboriginal land use and habitation in the area. There was a correlation between increasing stream order and larger numbers and higher densities of artefacts (from a comparison of first, second, and fourth order streams).
- Distance from water: the results showed that an assumption that sites would be clustered within 50 metres of water sources was not entirely correct from the data available. In first order stream landscapes, there was no significant correlation between artefact distribution and distance to water. In second order landscapes, artefact density was highest within 50 metres of water, and then declined with increasing distance. In fourth order landscapes, density was highest between 51-100 metres from water.

- **Landform:** Artefact density was considered to be lowest on upper slopes and ridgetops, with density increasing on mid and lower slopes. Density was highest in terrace landforms, and lower on creek flats, likely due to repeated flooding events and the erosion the caused.
- **Distance to silcrete sources:** the results of the study showed no significant difference between sites located closer to or further away from silcrete sources. However, 6 kilometres was the maximum tested distance from silcrete sources, so the sample is only representative of a limited area.
- **Aspect:** this only appeared to have an influence on sites in the lower parts of valleys, which may have been sited to take advantage of steady factors such as the rising/setting sun and wind direction. Sites in higher parts of valleys may have been influenced by weather and other factors.

GML and JMCHM (2012) completed an Aboriginal heritage assessment as part of the north-west rail link for the NSW Government, now known as the Sydney Metro. The railway sought to connect Epping and Rouse Hill with a stabling yard constructed at Tallawong. The route of the railway is 1.5 kilometres south of the study area.

The railway was first surveyed by JMCHM in 2006, this survey identified 14 sites and PADs. This assessment found the Rouse Hill area had a higher potential for artefact scatters and PAD (GML Heritage & Jo McDonald Cultural Heritage Management 2012, p.15). Further survey undertaken by GML focused on 17 construction areas along the NWRL route. Broadly, large artefact densities and PADs were identified in areas that weren't disturbed (GML Heritage & Jo McDonald Cultural Heritage Management 2012). However, most of these sites were found to be heavily disturbed based on modern developments. On average, ground visibility was 30% guided by exposures under trees and on pedestrian walkways. Few areas of moderate potential were identified where dense vegetated areas weren't found to be disturbed. In total, seven sites were identified.

Table 5 Sites identified during the NWRL survey (GML Heritage & Jo McDonald Cultural Heritage Management 2012, p.66)

Site	Site description	Distance to study area
14 Cumbelege Lane	Artefact scatter and PAD associated with driveway bank. 18 stone artefacts are located on the surface made of silcrete, quartz and chert.	4.9 km south-east
Corner Taggart Way and Balmoral Road	Isolated silcrete core in a disturbed area.	3.7 km south-east
87 Schofields Road	Five silcrete artefacts in disturbed context.	100 metres west
69 Schofields Road	Two silcrete artefact and one chert flake	800 metres west
65 Schofields Road	One silcrete core and one silcrete flaked piece on vehicle track	850 metres west
59 Schofields Road	Six artefacts comprised of silcrete, chert, mudstone located within a market garden on a rise landform overlooking Second Pounds Creek.	1.3 km west
28 Tallawong Road	One silcrete flake located in a market garden.	900 metres north-west

Artefact Heritage (Artefact Heritage 2013) undertook an Aboriginal heritage assessment of the Tallawong Stabling Yard as part of the NWRL project located approximately 1.2 kilometres west of the study area. Prior to assessment, a predictive model was established for the assessment area. Artefact Heritage suggested that open stone artefact types were most likely. These surface deposits would also be representative of sub-surface potential. Likewise, models for the Cumberland Plain suggest lower artefact densities on upper slopes

and crests. Higher densities exist on terrace landforms (Artefact Heritage 2013, p.23,24). The assessment consisted of transect survey of half of the assessment area as the northern portion was inaccessible. No previously unidentified Aboriginal sites were located during the survey. Attempts were made to relocate three AHIMS sites during the survey:

- Recorded by GML (2012) and was reported to contain an artefact scatter. Significant grass cover and furrowing within the site's reported location was found. The artefacts associated with this site could not be relocated.
- AHIMS 45-5-4766/65 Schofields Road: Reported to contain an isolated artefact adjacent to a dirt service road. The area was significantly disturbed by grass coverage and no artefacts were identified.
- AHIMS 45-5-4112/69 Schofields Road: Recorded by GML in 2011 (in Artefact Heritage 2013, p.30). No archaeological material was relocated. Previous test pits were identified. The area was also demonstrated to be disturbed.

The high levels of disturbance identified during the survey and within the previously recorded sites led to an assessment of low archaeological potential.

KNC (2013) provided an Aboriginal heritage salvage methodology of the west zone of the NWRL project, located 600 metres north-east of the study area at its nearest point. KNC undertook salvage excavations at sites previously identified by GML (2012). These sites consisted of a mixture of artefact scatters and disturbed landforms that were thought to contain archaeological potential. The location information within the methodology is heavily redacted so their accurate location could not be determined in relation to the assessment area. However, many were located in the vicinity of Schofields Road, adjacent to the NWRL route and assessment area.

Biosis Pty Ltd (2016) conducted test excavations along Rouse Road, 980 metres south of the study area. A 2015 survey identified that previously identified Aboriginal sites would be impacted by the proposed road development and confirmed that AHIMS 45-5-3108/PAD RH/SP had high archaeological potential. Test excavations were conducted within areas of high and moderate archaeological potential. A total of 66 test pits were excavated and a total of 188 artefacts were recovered. The test excavations resulted in the identification of three new Aboriginal sites, AHIMS 45-5-473/9RR-AD1, AHIMS 45-5-4740/RR-AD2 and AHIMS 45-5-4738/ RR-AD3 and redefined the extent of Aboriginal sites 45-5-3108/RH/SP 17 and AHIMS 45-5-3926/ RH/A20P 11.

Comber (2016) conducted an Aboriginal Due Diligence Assessment (ADDA) at 132 Tallawong Road, Rouse Hill, located approximately 600 metres south-west of the study area. Background research identified the site to have archaeological potential due to its location between two second order creeks and 3 kilometres from a third order creek. Expected site types were predicted to be artefact scatters and isolated finds. The survey of the site did not locate any Aboriginal objects due to poor visibility. Further investigation of the site through test excavations were recommended.

Biosis (2019) conducted an ADDA at 22 Worcester Road, Rouse Hill, and located approximately 1 kilometre south-east of the study area. Background research and predictive modelling identified a high potential for artefact scatters and PAD. The field investigation was restricted by poor GSV, and no sites were identified. However, due to the proximity of the assessment area to Second Ponds Creek and the identification of moderate and high levels of archaeological potential, further assessment was recommended.

KNC (2019) completed an Aboriginal heritage impact assessment at Bella Vista, approximately 5 kilometres south-east of the study area. Predictive modelling demonstrated a higher archaeological potential on landforms in proximity to creek lines while areas of low and moderate potential were identified on ridge, crest and slope landforms. The assessment identified the area to have some archaeological potential because of its location adjacent to Elizabeth McArthur Creek. Low density artefact scatters and PAD were identified in the

background research. Subsequent test excavations, adjacent to but outside of their assessment area, found that archaeological sites were located on elevated landforms adjacent to Elizabeth McArthur Creek. These sites contained flakes, tools and cores, the majority of which were made of silcrete. Several radio-carbon dates taken from charcoal samples returned dates between 4,385 years and 570 years.

Biosis (2020) undertook an ADDA at Schofields, located approximately 3 kilometres south-west of the study area. Background research identified one AHIMS site to be located within the assessment area and previous archaeological assessments deemed the area of low potential. A survey of the assessment area could not relocate the AHIMS site and no previously unrecorded sites were identified, confirming the results of previous assessments. No further assessment was recommended.

Extent (2020) undertook an ADDA for 201 Guntawong Road as part of initial development planning for the study area. This assessment undertook background research and a field survey. Extent noted that the eastern portion of 201 Guntawong Road, which the current study area is located, contained areas of disturbance located across slopes and hill crests. Extent determined that these areas of disturbance were unlikely to contain intact soil profiles and the likelihood of archaeological sites was low. Areas adjacent to First Ponds Creek associated with the *Nangamay Ngurra* Aboriginal Place nomination to the west of the current study area displayed lower evidence of disturbance and were assessed with high potential to contain intact archaeological deposits. Areas of moderate potential were also identified around the tributaries feeding into First Ponds Creek, with Extent noting that areas within 200 metres of these water courses, and which displayed low-moderate levels of disturbance, had potential to contain sub-surface deposits. Additional investigation in the form of an ACHA was recommended.

KNC (2024) undertook an ACHA for 201 Guntawong Road for Landcom as part of an application for civil and infrastructure subdivision works following on from Extent (2020). Their assessment included the current study area in its entirety. KNC identified five previously recorded Aboriginal sites within their assessment area none of which occur within the current study area. They undertook test excavations in areas of moderate potential identified by Extent (2020) as being within 200 metres of water course with low evidence of minimal disturbances present.

The results of KNC's excavations supported the predictions of Extent (2020). An additional three Aboriginal sites, AHIMS 45-5-5765/ Guntawong Road 1, AHIMS 45-5-5766/Guntawong Road 2, and AHIMS 45-5-5821/Guntawong Road 4 in proximity to the tributaries of First Ponds Creek were identified. AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4 are both within the current study area. AHIMS 45-5-5766/Guntawong Road 2 was located across a lower slope landform adjacent to a tributary of First Ponds Creek. The site was found to contain 15 artefacts across six test pits resulting in a density of 10 artefacts per square metre. AHIMS 45-5-5821/Guntawong Road 4 was located on mid slopes running adjacent to Guntawong Road. Two artefacts were identified across five test pits giving a density of 1.6 artefacts per square metre. The remainder of the current study area displayed evidence of historical disturbances and was of low potential. KNC recommended that an AHIP be sought for impacts to AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4, with salvage of a sample of AHIMS 45-5-5766/Guntawong Road 2 proposed due to the higher density of artefacts detected.

3.2.3 AHIMS site analysis

A search of the AHIMS database (Client Service ID: 934369) identified 83 Aboriginal archaeological sites within a 1.25 x 1.25 kilometre search area, centred on the study area (Figure 7). Two of these registered sites are located within the study area. AHIMS search results are provided in Appendix 1. The mapping coordinates recorded for these sites were checked for consistency with their descriptions and location on maps from

Aboriginal heritage reports where available. These descriptions and maps were relied upon where there were notable discrepancies.

It should be noted that the AHIMS database reflects Aboriginal sites that have been officially recorded and included on the list. Large areas of NSW have not been subject to systematic, archaeological survey; hence AHIMS listings may reflect previous survey patterns and should not be considered a complete list of Aboriginal sites within a given area. Some recorded sites consist of more than one element, for example artefacts and a modified tree, however for the purposes of this breakdown and the predictive modelling, all individual site types will be studied and compared. This explains why there are **93** results presented here, compared to the **83** sites identified in AHIMS. It should be noted, within the 83 sites identified in the AHIMS search, four were identified as “Not a Site”, this has been taken into consideration within the table below.

Table 6 AHIMS site type frequency

Site type	Number of occurrences	Frequency (%)
Artefact	76	81.72
PAD	11	11.82
Not a site	4	4.32
Modified tree	1	1.07
Ochre quarry	1	1.07
Total	93	100

3.2.4 Aboriginal sites within the study area

The desktop assessment has identified two Aboriginal sites located within the study area. A description of the sites is provided below.

AHIMS 45-5-5766/Guntawong Road 2

AHIMS 45-5-5766/Guntawong Road 2 is a low to moderate density subsurface artefact scatter which was recorded by KNC in 2024. The site is located across the lower slope of a spur running west from the ridgeline between Second Ponds and First Ponds Creek. A total of 15 artefacts were recovered from 1.5 metres squared, which is a mean artefact density of 10 artefacts per square metre.. The artefact assemblage consists of flake and flake fragments made of silcrete and IMT with two cores and one back blade fragment.



Photo 9 Silcrete artefacts from AHIMS 45-5-5766/Guntawong Road 2 (Source: Kelleher Nightingale Consulting 2024)

AHIMS 45-5-5821/Guntawong Road 4

AHIMS 45-5-5821/Guntawong Road 4 is a low-density subsurface artefact scatter which was previously recorded by KNC in 2024. The site consists of two silcrete flakes and is located within the mid slope of a spurline running along Guntawong Road. The site is approximately 190 metres each of the first order drainage tributary and 350 metres east of First Ponds Creek.

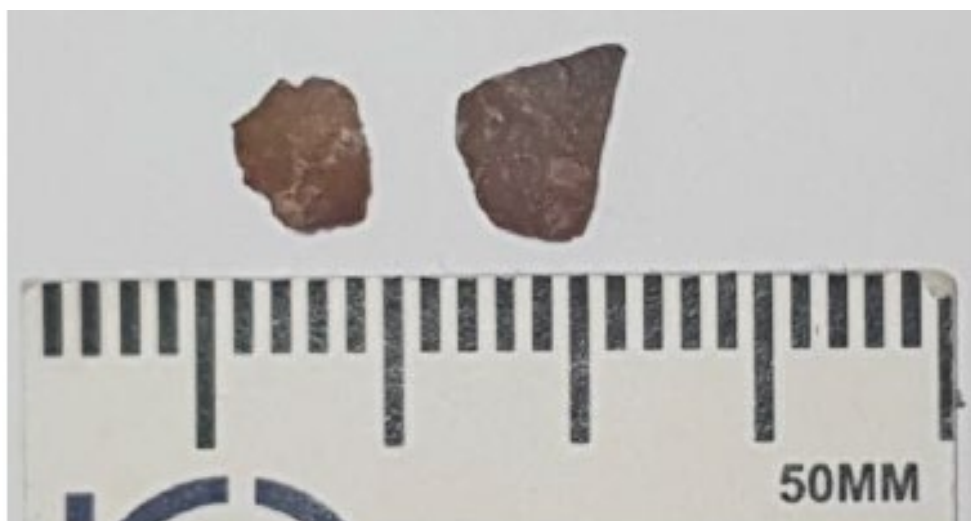


Photo 10 Silcrete flakes from AHMS 45-5-5821/Guntawong Road 4 (Source: Kelleher Nightingale Consulting 2024)

Nangamay Ngurra Aboriginal Place nomination

The study area is part of a wider Aboriginal Place nomination known as Nangamay Ngurra. The nominated Aboriginal place consists of the following lots:

- Lot 9 Section Q DP712
- Lot 1-3, 22-26 DP 1447
- Lot 33 DP 39341
- Lot 4, 5, 43, 44, 46, 47 DP 1239068
- Lot 20-21 DP 1246798
- Lots 4 (part), 5, 6 (part), 8 DP 1252397
- Lot 1 DP 1283186
- Cranbourne Street (part)
- Keogh Street (part)
- Orticelli Street (part)
- Skinner Street (part)

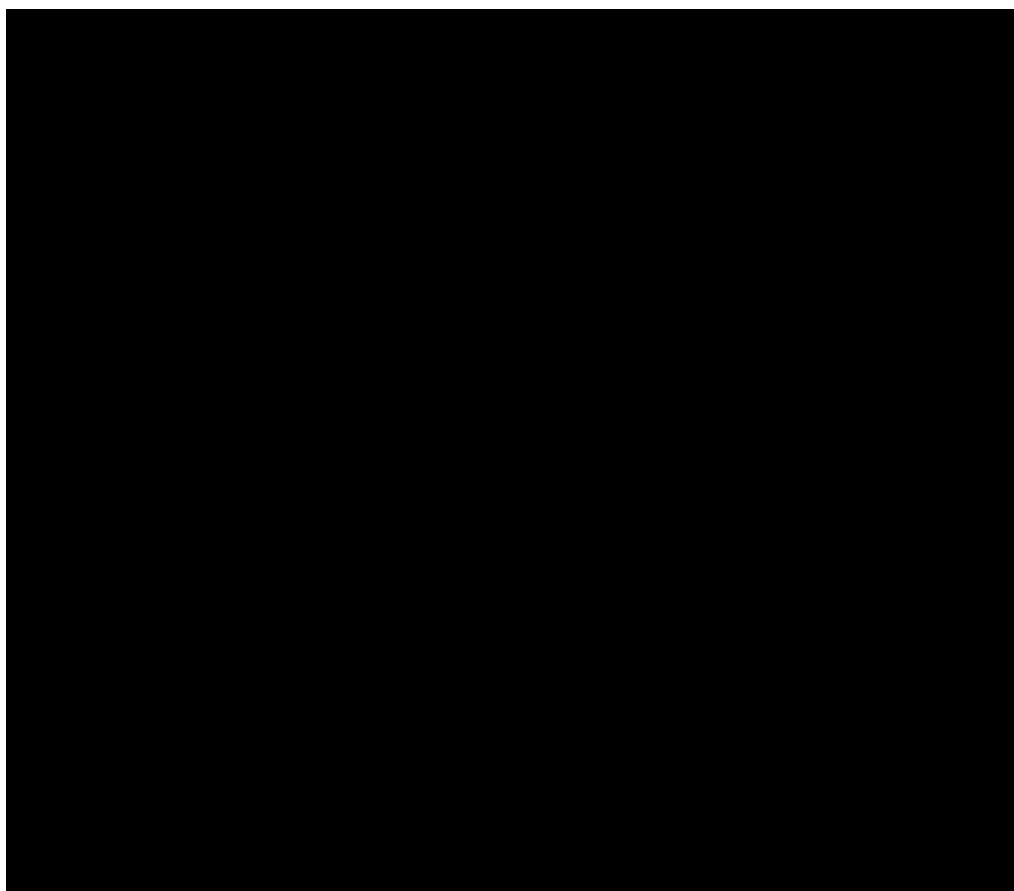


Photo 11 *Nangamay Ngurra* Aboriginal Place nomination with current study area outlined in red (Kelleher Nightingale Consulting 2024)

Nangamay Ngurra includes a ceremonial and men's site, and a burial place. *Nangamay Ngurra* has high cultural significance, the area would have been utilised by all clans of Dharug whom would travel to meet within this area. *Nangamay Ngurra* includes a complex of archaeological sites which provide tangible evidence of the Dharug occupation within the study area and vicinity. The known archaeological sites within the *Nangamay Ngurra* Aboriginal Place nomination include :

- AHIMS 45-5-4311/A7 Archaeological Complex. This includes sites A6, A8, RV27 AND RV26. The sites include surface scatters, isolated finds, sub-surface archaeological deposits and possible culturally modified trees within the vicinity of the study area..

- AHIMS 45-5-4955/First Ponds 1
- AHIMS 45-5-5418/Guntawong IF1
- AHIMS 45-5-5419/Guntawong AS2
- AHIMS 45-5-5420/Clarke Guntawong AS1
- AHIMS 45-5-5421/Clarke AS1
- AHIMS 45-5-5422/Clarke AS2
- AHIMS 45-5-5425/Guntawong AS1
- AHIMS 45-5-5765/Guntawong Road 1
- AHIMS 45-5-5766/Guntawong Road 2
- AHIMS 45-5-5821/Guntawong Road 4
- AHIMS 45-5-5018/ CS-AD-01

Archaeological sites associated with the nominated Aboriginal Place which overlap with the proposed activity area are AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4.

Figure 7 AHIMS sites within the vicinity of the study area

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3.3 Discussion

The study area is located with a flat and slope landform underlain by Bringelly Shale formation. The deep residual soil of the Blacktown soil landscape covers the extent of the study area. A first order non perennial water source is located in the southern portion of the study area which flows easterly. This water course is a tributary of First Ponds Creek, a third order perennial water course located 240 metres to the west of the study area. These landforms and proximity to water sources would have provided an abundance of natural food and material resources which would have been utilised by Aboriginal people within the local region. The study area is included within a high culturally significant nominated Aboriginal Place *Nanagamay Ngurra* which consists of multiple archaeological sites. This area would have been a meeting place for Dharug clans as a ceremonial site, men's site and burial place.

A simple analysis of the Aboriginal cultural heritage sites registered within 1.25 kilometre buffer of the study area and review of archaeological assessments within the local and wider region indicate that artefact sites are the most common site type and are likely to consist of either isolated finds or artefact scatters made predominantly of silcrete (KNC 2024). The Blacktown soil landscape contains deep soil profiles that develop over extensive periods of time. Previous studies display that if this soil landscape is left undisturbed, there is a high potential for archaeological deposits to remain (Stephanie Garling Archaeological Consulting (SGAC) 2000).

Within the study area, test excavations were undertaken by KNC (2024) which identified AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4. AHIMS 45-5-5766/Guntawong Road 2 was located across a lower slope landform adjacent to a tributary of First Ponds Creek. The site was found to contain 15 artefacts across six test pits resulting in a density of 10 artefacts per square metre. AHIMS 45-5-5821/Guntawong Road 4 was located on mid slopes running adjacent to Guntawong Road. Two artefacts were identified across five test pits giving a density of 1.6 artefacts per square metre. KNC recommended an AHIP be sought for impacts to AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4, with salvage of a sample of AHIMS 45-5-5766/Guntawong Road 2 proposed due to the higher density of artefacts detected.

3.3.1 Predictive model

A model has been formulated to broadly predict the type and character of Aboriginal cultural heritage sites likely to have existed throughout the study area and where they are more likely to be located.

This model is based on:

- Site distribution in relation to landscape descriptions within the study area.
- Consideration of site type, raw material types and site densities likely to be present within the study area.
- Findings of the ethnohistorical research on the potential for material traces to present within the study area.
- Potential Aboriginal use of natural resources present or once present within the study area.
- Consideration of the temporal and spatial relationships of sites within the study area and surrounding region.

Table 7 indicates the site types most likely to be encountered across the present study area. The definition of each site type is described firstly, followed by the predicted likelihood of this site type occurring within the study area.

Table 7 Aboriginal site prediction statements

Site type	Site description	Potential
Flaked stone artefact scatters and isolated artefacts	Artefact scatter sites can range from high-density concentrations of flaked stone and ground stone artefacts to sparse, low-density 'background' scatters and isolated finds.	High: Stone artefact sites have been previously recorded in the region across a wide range of landforms including alluvial flats, and within the study area; they have the high potential to be present in undisturbed areas within the study area.
PADs	Potential sub surface deposits of cultural material.	High: PADs have been previously recorded in the region across a wide range of landforms including alluvial flats. They have the potential to be present in undisturbed landforms.
Aboriginal Places	Aboriginal Places may not contain any 'archaeological' indicators of a site, but are nonetheless important to Aboriginal people. They may be places of cultural, spiritual or historic significance. Often they are places tied to community history and may include natural features (such as swimming and fishing holes), places where Aboriginal political events commenced or particular buildings.	High: The study area is located within a wider landscape which is a nominated Aboriginal Place.
Modified trees	Trees with cultural modifications	Low-Medium: A small number of mature native trees have survived within the study area, due to extensive vegetation clearing from the 1800's onwards.
Burials	Aboriginal burial sites.	Low -Medium: Aboriginal burial sites are generally situated within deep, soft sediments, caves or hollow trees. Areas of deep sandy deposits will have the potential for Aboriginal burials. The soil profiles associated with the study area are not commonly associated with burials. However, burials are likely to exist within the A7 Archaeological Complex located east of the study area.
Ochre quarry	Ochre quarry sites where Aboriginal people gathered materials used for painting.	Low: There is only one record of an ochre quarry within the vicinity of the study area.
Shell middens	Deposits of shells accumulated over either singular large resource gathering events or over longer periods of time.	Low: Shell midden sites have not been recorded within the study area. No shell middens have been located in the vicinity of the study area. There is some potential for shell middens to be located in vicinity of permanent water sources which is not located within the study area. There is a low potential of Shell Middens being present within the study area.
Quarries	Raw stone material procurement sites.	Low: There is no record of any quarries being within or surrounding the study area.
Aboriginal ceremony and Dreaming Sites	Such sites are often intangible places and features and are identified through oral histories, ethnohistoric data, or Aboriginal informants.	Low: There are currently no recorded mythological stories for the study area.

Site type	Site description	Potential
Post-contact sites	These are sites relating to the shared history of Aboriginal and non-Aboriginal people of an area and may include places such as missions, massacre sites, post-contact camp sites and buildings associated with post-contact Aboriginal use.	Low: There are no post-contact sites previously recorded in the study area and historical sources do not identify one.
Axe grinding grooves	Grooves created in stone platforms through ground stone tool manufacture.	Very Low: The geology of the study area lacks suitable horizontal sandstone rock outcrops for axe-grinding grooves. Therefore, there is low potential for axe grinding grooves to occur in the study area.
Rock shelters with art and / or deposit	Rock shelter sites include rock overhangs, shelters or caves, and generally occur on, or next to, moderate to steeply sloping ground characterised by cliff lines and escarpments. These naturally formed features may contain rock art, stone artefacts or midden deposits and may also be associated with grinding grooves.	Very Low: The sites will only occur where suitable sandstone exposures or overhangs possessing sufficient sheltered space exist, which are not present in the study area.

4 Archaeological survey

A field survey of the study area was undertaken on 23 October 2024 by Mathew Smith (Biosis, Senior Heritage Consultant) and Alyce Haast (DoE). Justine Coplin (DCAC) attended the field survey to provide cultural information but did not undertake the survey with Mathew Smith due to the cultural sensitivity of the area. The field survey sampling strategy, methodology and a discussion of results are provided below.

4.1 Archaeological survey objectives

The objectives of the survey were to:

- Provide RAPs an opportunity to view the study area and to discuss previously identified Aboriginal object(s) and/or place(s) in or within close proximity to the study area.
- Attempt to re-identify Aboriginal archaeological sites previously identified in the study area.
- Undertake a systematic survey of the study area targeting all landforms in the study area
- Identify and record Aboriginal archaeological sites visible on the ground surface.
- Identify and record areas of PADs.

4.2 Archaeological survey methodology

The survey methods were intended to assess and understand the landforms and to determine whether any archaeological material from Aboriginal occupation or land use exists within the study area.

4.2.1 Sampling strategy

The survey effort targeted all landforms and previously recorded AHIMS site in the study area that will potentially be impacted by the development. It focused on areas with increased ground surface visibility (GSV) and exposure as this enabled Aboriginal objects to be identified on the ground surface.

4.2.2 Survey methods

The archaeological survey was conducted on foot with a field team of two members. Recording during the survey followed the archaeological survey requirements of the Code and industry best practice methodology. Information that recorded during the survey included:

- Aboriginal objects or sites present in the study area during the survey.
- Survey coverage.
- Any resources that may have been exploited by Aboriginal people.
- Landform.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

Where possible, identification of natural soil deposits within the study area was undertaken. Photographs and recording techniques were incorporated into the survey including representative photographs of survey units, landform, vegetation coverage, GSV and the recording of soil information for each survey unit were possible.

Any potential Aboriginal objects observed during the survey were documented and photographed. The location of Aboriginal cultural heritage and points marking the boundary of the landform elements were recorded using a handheld Global Positioning System (GPS) and the Map Grid of Australia (94) coordinate system.

4.3 Archaeological survey results

A total of one transect was walked across two landforms with the two surveyors walking 2 metres apart (Figure 8). This follows the methodology set out in Burke & Smith (2004, p. 65), which states that a single person can only effectively visually survey an area of two linear metres. One new Aboriginal site was identified in the study area. The results from the field survey have been summarised in Table 8 below and full transect details are provided in Figure 8.

Table 8 Survey coverage

Survey unit	Landform	Survey unit area (m ²)	Visibility (%)	Exposure (%)	Effective coverage area (m ²)	Effective coverage (%)
1	Flat	1280	5	5	3.2	0.25
1	slope	4160	5	5	10.4	0.25

Table 9 Landform summary

Landform	Landform area (m ²)	Area effectively surveyed (m ²)	Landform effectively surveyed (%)	No. of Aboriginal sites	No. of artefacts or features identified during survey
Flat	11173	3.2	0.029	2	0
Slope	31127	10.4	0.033	1	1

4.3.1 Constraints to the survey

With any archaeological survey there are several factors that influence the effectiveness (the likelihood of finding sites) of the survey. The factors that contributed most to the effectiveness of the survey were reduced visibility caused by extensive grass coverage.

4.3.2 Visibility

In most archaeological reports and guidelines visibility refers to GSV, and is usually a percentage estimate of the ground surface that is visible and allowing for the detection of (usually stone) artefacts that may be present on the ground surface (DECCW 2010).

GSV during the survey varied throughout the study area but was generally low (0–10%) with the average being approximately 5%. GSV was hindered by extensive grass coverage and tree litter (Photo 12 and Photo 13).



Photo 12 Low GSV in the central portion of the study area on slope landform, facing north-east (1 metre scale)



Photo 13 Isolated area of higher GSV on the flat landform, facing south-east (1 metre scale)

4.3.3 Exposure

Exposure refers to the geomorphic conditions of the local landform being surveyed and attempts to describe the relationship between those conditions and the likelihood the prevailing conditions provide for the exposure of (buried) archaeological materials. Whilst also usually expressed as a percentage estimate, exposure is different to visibility in that it is in part a summation of geomorphic processes, rather than a simple observation of the ground surface (Burke & Smith 2004, p.79, DECCW 2010).

Overall, the study area displayed very few areas of exposure, ranging between 0–10%, with an average of approximately 5% across the study area. Exposure was mainly seen around vehicle access areas and in areas where erosion was prevalent such as the walls of drainage channels (Photo 14 to Photo 15).



Photo 14 Area of exposure in vehicle tire rut (1 metre scale)



Photo 15 Area of exposure on eroded wall of drainage line (0.5 metre scale)

4.3.4 Disturbances

Disturbance levels within the study area were assessed during the visual inspection. Levels of disturbance were categorised through an inspection of the ground surface. Disturbance levels within the study area have been categorised according to the following criteria:

- High disturbance—the landform has been heavily disturbed and all natural soil horizons have been displaced or removed, these areas are unlikely to contain Aboriginal cultural material.
- Moderate disturbance—the landform has undergone disturbances to a certain degree, but the extent and nature of these disturbances cannot be fully quantified. Aboriginal cultural material may be present within these locations but is unlikely to be *in situ*.
- Low disturbance—the landform has not been significantly disturbed and is highly likely to contain intact soil horizons. Aboriginal cultural material if present is likely to be *in situ*.

Historic and recent aerials (Photo 3 to Photo 8) show that the study area has been subject to moderate levels of disturbance. This has occurred in the forms of vegetation clearance, livestock grazing and infrastructure associated with those activities.

Visible disturbance consisted of access tracks traversing portions of the study area and stockyards located in the eastern extent of the study area with associated areas of cut and fill earthworks adjacent. The remainder of the study area did not display further visible disturbances as a result of extensive grass cover.

A representation of the disturbances that were noted during the archaeological survey are shown in Photo 16 and Photo 17.



Photo 16 Photo showing representative area of disturbance as a result of vehicle access track (1 metre scale)



Photo 17 Area of cut and fill disturbance with spoil heap in the background (1 metre scale)

4.4 Discussion of archaeological survey results

The archaeological survey consisted of one meandering transect which targeted all landforms present in the study area. The results of the survey have been summarised below and transect locations are provided in Figure 8. Overall, the survey was hindered by low average GSV (5%), as a result of extensive grass coverage and dense vegetation. This affected the surveyor's abilities to identify Aboriginal sites upon the grounds surface, and prohibited surveyors from making further observations on levels of exposure and disturbance to subsurface deposits.

As noted above in Section 4.3.4, disturbance was observed in association with the historical uses of the study area for grazing and pastoral purposes. The areas of most significant disturbance were located on the highest portion of the slope landform within the eastern portion of the study area, with stock yards and areas of cut and fill earthworks present. The central portion of the study area displayed disturbances in historical aerial imagery associated with removal of the native Cumberland Plain woodland. The bulk earthworks and removal of Cumberland Plain woodland, which would have been dominated by Forest Red Gums in the study area, would have resulted in significant disturbances to A soil horizons and any potential subsurface deposits.

The field investigation did identify one Aboriginal object, a quartzite hammerstone located on the surface of a disturbed access track. The artefact was not found to be in-situ and displayed damage from vehicle use of the access track. AHIMS sites, AHIMS 45-5-5766/Guntawong Road 2 and AHIMS 45-5-5821/Guntawong Road 4 within the study area were investigated as part of the survey. Both of these sites consisted of subsurface artefact deposits and the survey did not identify any surface artefacts in association with these sites.

Based on the results of the field investigation and previous test excavations undertaken by KNC the study area displays sporadic, and isolated deposits of archaeological material. These areas of material are restricted to the areas of minimal disturbance such as at AHIMS 45-5-5821/Guntawong Road 4 on the northern boundary of the study area, and AHIMS 45-5-5766/Guntawong Road 2 in the western portion of the study area associated with the flat landform in close proximity to the drainage line. Disturbances in the eastern and central portions of the study area will have resulted in the removal of A horizon soils resulting in a low potential that intact sub-surface deposits are present in these areas.

New Aboriginal sites identified in the study area

AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 was identified during a field investigation by Biosis. The site consists of an isolated artefact located on the surface of an access track within the southern portion of the study area. The artefact consisted of a quartzite river cobble fragment with battering damage on the intact distal end consistent with use as a hammerstone. The artefact displayed some damage from vehicle use of an access track. The artefact was not in-situ and has been deposited in its location by non-cultural actions.



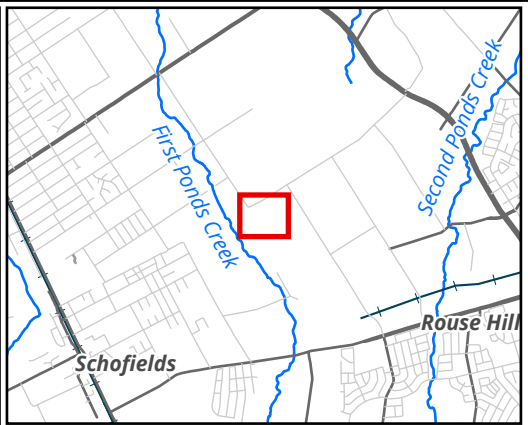
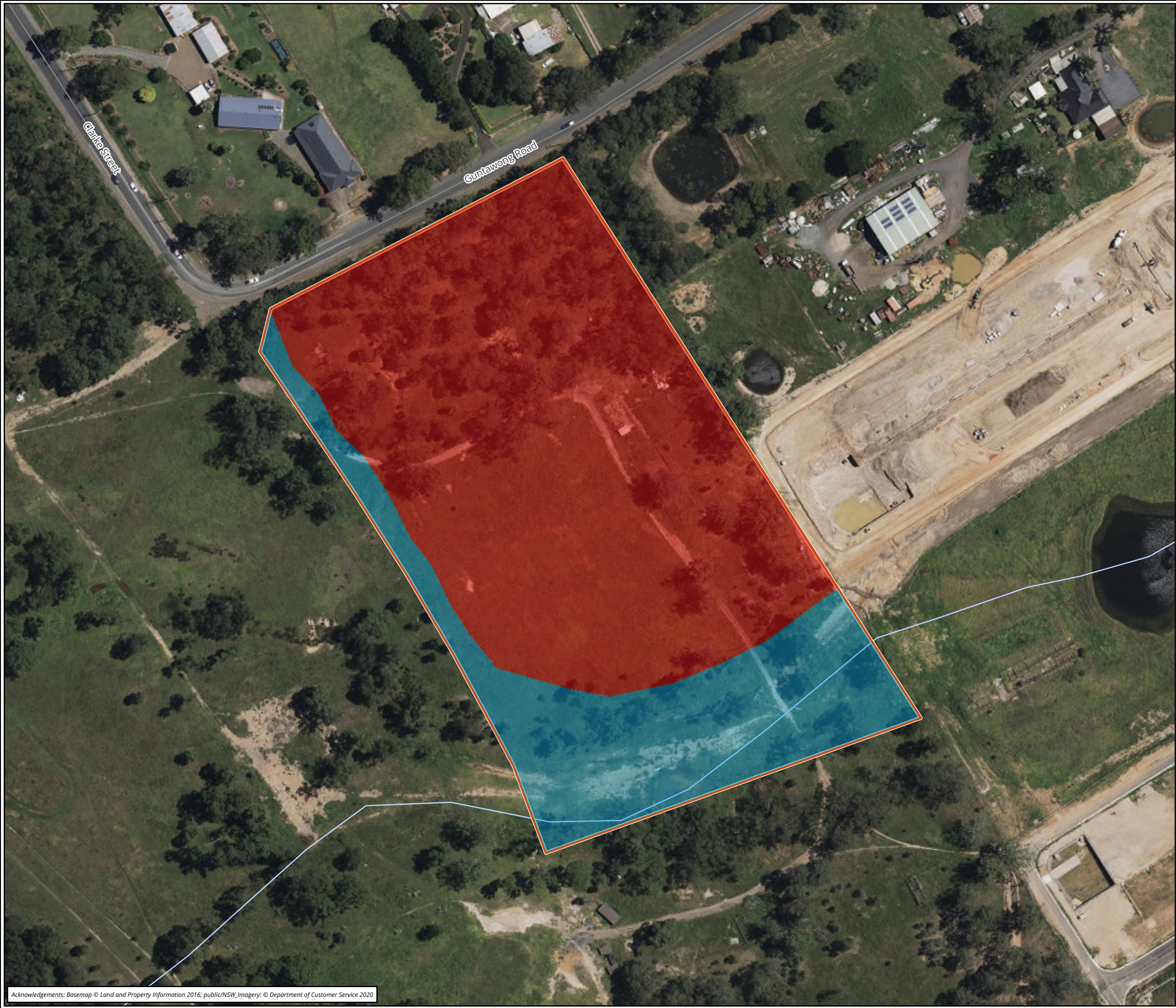
Photo 18 AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1




Photo 19 AHIMS 450505913/201 Guntawong Rd Hammerstone 1, photo portraying the distal end with battering damage

Figure 8 Survey results and coverage

This figure has been removed for public exhibition.



Legend

 Study area

Landforms

 Flat

 Slope

Figure 9 Landforms

0 10 20 30 40 50

Metres

Scale: 1:1,500 @ A3

Coordinate System: GDA2020 MGA Zone 56



Matter: 40105, Date: 29 November 2024,
Prepared for: MC, Prepared by: AA, Last edited by: aabid
Location: P:\40100s\40105\Mapping\
40105_Tallawong_ACHA,
Layout: 40105_ACHA_F9_Landforms

5 Scientific values and significance assessment

The two main values addressed when assessing the significance of Aboriginal sites are cultural values to the Aboriginal community and archaeological (scientific) values. This report will assess scientific values while the ACHA report will detail the cultural values of Aboriginal sites in the study area.

5.1 Introduction to the assessment process

Heritage assessment criteria in NSW fall broadly within the significance values outlined in the Australia International Council on Monuments and Sites (ICOMOS) Burra Charter (Australia ICOMOS 2013). This approach to heritage has been adopted by cultural heritage managers and government agencies as the set of guidelines for best practice heritage management in Australia. These values are provided as background and include:

- **Historical significance** (evolution and association) refers to historic values and encompasses the history of aesthetics, science and society, and therefore to a large extent underlies all of the terms set out in this section. A place may have historic value because it has influenced, or has been influenced by, an historic figure, event, phase or activity. It may also have historic value as the site of an important event. For any given place the significance 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.
- **Aesthetic significance** (Scenic/architectural qualities, creative accomplishment) refers to the sensory, scenic, architectural and creative aspects of the place. It is often closely linked with social values and may include consideration of form, scale, colour, texture, and material of the fabric or landscape, and the smell and sounds associated with the place and its use.
- **Social significance** (contemporary community esteem) refers to the spiritual, traditional, historical or contemporary associations and attachment that the place or area has for the present-day community. Places of social significance 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 significance be damaged or destroyed. These aspects of heritage significance can only be determined through consultative processes with local communities.
- **Scientific significance** (Archaeological, industrial, educational, research potential and scientific significance values) refers to the importance of a landscape, area, place or object because of its archaeological and/or other technical aspects. Assessment of scientific value is often based on the likely research potential of the area, place or object and will consider the importance of the data involved, its rarity, quality or representativeness, and the degree to which it may contribute further substantial information.

The cultural and archaeological significance of Aboriginal and historic sites and places is assessed on the basis of the significance values outlined above. As well as the ICOMOS Burra Charter significance values guidelines, various government agencies have developed formal criteria and guidelines that have application when assessing the significance of heritage places within NSW. Of primary interest are guidelines prepared by the Australian Commonwealth Department of Climate Change, Environment, Energy, and Water (Cth DCCEEW), Heritage NSW. The relevant sections of these guidelines are presented below.

These guidelines state that an area may contain evidence and associations which demonstrate one or any combination of the ICOMOS Burra Charter significance values outlined above in reference to Aboriginal heritage. Reference to each of the values should be made when evaluating archaeological and cultural significance for Aboriginal sites and places.

In addition to the previously outlined heritage values, the Heritage NSW Guidelines (OEH 2011) also specify the importance of considering cultural landscapes when determining and assessing Aboriginal heritage values. The principle behind a cultural landscape is that 'the significance of individual features is derived from their inter-relatedness within the cultural landscape'. This means that sites or places cannot be 'assessed in isolation' but must be considered as parts of the wider cultural landscape. Hence the site or place will possibly have values derived from its association with other sites and places. By investigating the associations between sites, places, and (for example) natural resources in the cultural landscape the stories behind the features can be told. The context of the cultural landscape can unlock 'better understanding of the cultural meaning and importance' of sites and places.

Although other values may be considered — such as educational or tourism values — the two principal values that are likely to be addressed in a consideration of Aboriginal sites and places are the cultural/social significance to Aboriginal people and their archaeological or scientific significance to archaeologists. The determinations of archaeological and cultural significance for sites and places should then be expressed as statements of significance that preface a concise discussion of the contributing factors to Aboriginal cultural heritage significance.

5.2 Archaeological (scientific significance) values

Archaeological significance (also called scientific significance, as per the ICOMOS Burra Charter) refers to the value of archaeological objects or sites as they relate to research questions that are of importance to the archaeological community, including indigenous communities, heritage managers and academic archaeologists. Generally the value of this type of significance is determined on the basis of the potential for sites and objects to provide information regarding the past life-ways of people (Burke & Smith 2004, p.249, NPWS 1997, p.26).

For this reason, the NPWS summarises the situation as 'while various criteria for archaeological significance assessment have been advanced over the years, most of them fall under the heading of archaeological research potential' (NPWS 1997, p.26).

The NPWS criteria for archaeological significance assessment are based largely on the ICOMOS Burra Charter.

Research potential

Research potential is assessed by examining site content and site condition. Site content refers to all cultural materials and organic remains associated with human activity at a site. Site content also refers to the site structure – the size of the site, the patterning of cultural materials within the site, the presence of any stratified deposits and the rarity of particular artefact types.. Site condition refers to the degree of disturbance to the contents of a site at the time it was recorded.

Table 10 and Table 11 outline the site content and site condition rating used for archaeological sites.

Table 10 Site contents ratings used for archaeological sites

Rating	Description
0	No cultural material remaining.

Rating	Description
1	Site contains a small number (e.g. 0–10 artefacts) or limited range of cultural materials with no evident stratification.
2	Site contains a larger number, but limited range of cultural materials; and/or some intact stratified deposit remains; and/or are or unusual example(s) of a particular artefact type.
3	Site contains a large number and diverse range of cultural materials; and/or largely intact stratified deposit; and/or surface spatial patterning of cultural materials that still reflect the way in which the cultural materials were deposited.

Table 11 Site condition ratings used for archaeological sites

Rating	Description
0	Site destroyed.
1	Site in a deteriorated condition with a high degree of disturbance; lack of stratified deposits; some cultural materials remaining.
2	Site in a fair to good condition, but with some disturbance.
3	Site in an excellent condition with little or no disturbance. For surface artefact scatters this may mean that the spatial patterning of cultural materials still reflects the way in which the cultural materials were laid down.

Pearson & Sullivan (1995, p. 149) note that Aboriginal archaeological sites are generally of high research potential because ‘they are the major source of information about Aboriginal prehistory’. Indeed, the often great time depth of Aboriginal archaeological sites gives them research value from a global perspective, as they are an important record of humanity’s history. Research potential can also refer to specific local circumstances in space and time — a site may have particular characteristics (well preserved samples for absolute dating, or a series of refitting artefacts, for example) that mean it can provide information about certain aspects of Aboriginal life in the past that other less or alternatively valuable sites may not (Burke & Smith 2004, pp.247–248). When determining research potential value particular emphasis has been placed on the potential for absolute dating of sites.

The following sections provide statements of significance for the Aboriginal archaeological sites recorded. The significance of each site follows the assessment process outlined above. This includes a statement of significance based on the categories defined in the Burra Charter. These categories include social, historic, scientific, aesthetic and cultural (in this case archaeological) landscape values. Nomination of the level of value — high, moderate, low or not applicable — for each relevant category is also proposed. Where suitable the determination of cultural (archaeological) landscape value is applied to both individual sites and places (to explore their associations) and also, to the study area as a whole. The nomination levels for the archaeological significance of each site are summarised below.

Representativeness

Representativeness refers to the regional distribution of a particular site type. Representativeness is assessed by whether the site is common, occasional, or rare in a given region. Assessments of representativeness are subjectively biased by current knowledge of the distribution and number of archaeological sites in a region. This varies from place to place depending on the extent of archaeological research. Consequently, a site that is assigned low significance values for contents and condition, but a high significance value for representativeness, can only be regarded as significant in terms of knowledge of the regional archaeology. Any such site should be subject to re-assessment as more archaeological research is undertaken.

Assessment of representativeness also considers the contents and condition of a site. For example, in any region there may only be a limited number of sites of any type that have suffered minimal disturbance. Such sites would therefore be given a high significance rating for representativeness, although they may occur commonly within the region.

Table 12 outlines the site representativeness ratings used for archaeological sites.

Table 12 Site representativeness ratings used for archaeological sites

Rating	Description
1	Common occurrence
2	Occasional occurrence
3	Rare occurrence

Overall scientific significance ratings for sites, based on a cumulative score for site contents, site integrity and representativeness are provided in Table 13.

Table 13 Scientific significance ratings used for archaeological sites

Rating	Description
1-3	Low scientific significance
4-6	Moderate scientific significance
7-9	High scientific significance

Each site is given a score on the basis of these criteria. The overall scientific significance is determined by the cumulative score. This scoring procedure has been applied to the Aboriginal archaeological sites identified during the sub-surface testing. The results are provided in Table 16.

5.2.1 Statements of archaeological significance

The following archaeological significance assessment is based on Requirement 11 of the Code. Using the assessment criteria detailed in Scientific Values and Significance Assessment, an assessment of significance was determined and a rating for each site was determined. The results of the archaeological significance assessment are given in Table 14 below.

Table 14 Scientific significance assessment of archaeological sites recorded within the study area.

Site name	Site content	Site condition	Representativeness	Scientific significance
AHIMS 45-5-5821/ Guntawong Road 4	1	2	1	4 - Moderate
AHIMS 45-5-5766/ Guntawong Road 2	2	2	1	5 - Moderate
AHIMS 45-5-5913/ 201 Guntawong Rd Hammerstone 1	1	1	1	3 - Low
Nominated Aboriginal Place – <i>Nanagamay Ngurra</i>	TBC	TBC	TBC	TBC

Table 15 Statements of scientific significance for archaeological sites recorded within the study area.

Site name	Statement of significance
AHIMS 45-5-5821/ Guntawong Road 4	AHIMS 45-5-5821/Guntawong Road 4 is a low-density subsurface artefact scatter which was previously recorded by KNC in 2024. The site consists of two silcrete flakes and is located within the mid slope of a spurline running along Guntawong Road. The site is approximately 190 metres each of the first order drainage tributary and 350 metres east of First Ponds Creek. The archaeological assessment completed by KNC determined that AHIMS 45-5-5821/Guntawong Road 4 is a common site type and possess low potential for further information to be obtained which could contribute to our understanding of Aboriginal land use within the local region. AHIMS 45-5-5821/Guntawong Road 4 therefore possess low scientific potential.
AHIMS 45-5-5766/ Guntawong Road 2	AHIMS 45-5-5766/Guntawong Road 2 is a low to moderate density subsurface artefact scatter which was recorded by KNC in 2024. The site is located across the lower slope of a spur running west from the ridgeline between Second Ponds and First Ponds Creek. A total of 15 artefacts were recovered from 1.5m ² , which is a mean artefact density of 10 artefacts per m ² . The artefact assemblage consists of flake and flake fragments made of silcrete and IMT with two cores and one back blade fragment. The archaeological assessment completed by KNC determined that AHIMS 45-5-5766/Guntawong Road 2 is a common site type which possesses moderate potential for further information to be obtained which could contribute to our understanding of Aboriginal land use within the local region. KNC has recommended that AHIMS 45-5-5766/Guntawong Road 2 possess moderate scientific potential and further investigation in the form of a salvage excavation should be undertaken.
AHIMS 45-5-5913/ 201 Guntawong Rd Hammerstone 1	AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 was identified during a field investigation by Biosis. The site consists of an isolated artefact located on the surface of an access track within the southern portion of the study area. The artefact consisted of a quartzite river cobble fragment with battering damage on the intact distal end consistent with use as a hammerstone. The artefact displayed some damage from vehicle use of an access track. The artefact was not in-situ and has been deposited in its location by non-cultural actions. The archaeological assessment determined that AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 is a common site type and possess low potential for further information to be obtained which could contribute to our understanding of Aboriginal land use within the local region. AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 therefore possesses low scientific significance.
<i>Nangamay Ngurra</i> Aboriginal Place nomination	<i>Nangamay Ngurra</i> includes a ceremonial and men's site, and a burial place. <i>Nangamay Ngurra</i> has high cultural significance, the area would have been utilised by all clans of Dharug whom would travel to meet within this area. <i>Nangamay Ngurra</i> includes a complex of archaeological sites which provide tangible evidence of the Dharug occupation within the study area and vicinity. The known archaeological site associated with the <i>Nangamay Ngurra</i> Aboriginal Place nomination located within the study area is AHIMS 45-5-5766/Guntawong Road 2.

6 Impact assessment

There are three recorded Aboriginal sites and one nominated Aboriginal Place that may be subject to harm within the study area. It is expected that potential harm to Aboriginal archaeological sites from the development in the study area is high. Strategies to avoid or minimise harm to Aboriginal heritage in the study area are discussed below.

6.1 Predicted physical impacts

As previously outlined, the proposed works involve the development of a new high school, which will comprise of the following works:

- Three learning hubs (three-storey in height) accommodating 49 general teaching spaces and three SLUs.
- Other core facilities including amenities, library, staff hub and administrative areas.
- Standalone school hall.
- Separate carpark with 72 spaces.
- Kiss and drop zone along Nirmal Street.
- Open play space including sports courts and sports field.
- Public domain works.

The proposed site access arrangements are as follows:

- Main pedestrian entrance to be located off Nirmal Street.
- Kiss and drop zone proposed along Nirmal Street.
- Onsite parking access via Nirmal Street.

Left unmitigated, these activities have the potential to completely remove or disturb AHIMS 45-5-5821/Guntawong Road 4, AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 and nominated Aboriginal Place *Nanagamay Ngurra*. Harm to AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 cannot be avoided with the current design plan. Harm to AHIMS 45-5-5766/Guntawong Road 2 has been avoided through redesign. A summary of impacts is provided below in Table 16.

Table 16 Summary of potential archaeological impacts

AHIMS site no.	Site name	Scientific Significance	Type of harm	Degree of harm	Mitigation measures
AHIMS 45-5-5821	Guntawong Road 4	Low	Direct	Total loss of value	Avoidance of site, heritage induction and development of an ACHMP. If avoidance is not possible and AHIP to impact should be obtained.
AHIMS 45-5-5766	Guntawong Road 2	Moderate	Direct	Total loss of value	Fencing, heritage induction and development of an ACHMP. If site

AHIMS site no.	Site name	Scientific Significance	Type of harm	Degree of harm	Mitigation measures
					cannot be avoided, an AHIP to impact and salvage should be obtained.
AHIMS 45-5-5913	201 Guntawong Rd Hammerstone 1	Low	Direct	Total loss of value	Avoidance of site, heritage induction and development of an ACHMP. AHIP to impact should be obtained.
Nangamay Ngurra Aboriginal Place nomination	Nangamay Ngurra Aboriginal Place nomination	TBC	Direct	Partial loss of value	Avoidance of site, heritage induction and development of an ACHMP. Where avoidance is not possible, and if the nominated is approved by Heritage NSW an AHIP to impact should be obtained.

6.2 Ecologically Sustainable Development

One of the primary aims of the NP&W Act is the 'conservation of objects places and features ... of cultural value within the landscape, including ... places, objects and features of significance to Aboriginal people ...' ((s.2A(1)(b)(i)). The *Operational Policy: Protecting Aboriginal Cultural Heritage (Version 2)* (DECC NSW 2011) provides guidance to proponents in term of 1.1 Ecologically Sustainable Development (ESD).

ESD has been defined in Part 3, 6. (2) Objective of the Authority of the *Protection of the Environment Administration Act 1991* (NSW). This outlines that the ESD requires the integration of economic and environmental considerations (including cultural heritage) in the decision-making process. In regard to Aboriginal cultural heritage, ESD can be achieved by applying the principle of intergenerational equity and the precautionary principle.

Intergenerational equity

The principle of intergenerational equity states that the present generation should make every effort to ensure the health, diversity and productivity of the environment – which includes cultural heritage – for the benefit of future generations.

In terms of Aboriginal cultural heritage, intergenerational equity can be considered in terms of the 'cumulative impacts' of any proposal to Aboriginal objects and places. For example, if few Aboriginal objects and places remain in a region (because of harm authorised under previous AHIPs), fewer opportunities remain for future generations of Aboriginal people to enjoy the cultural benefits of those Aboriginal objects and places.

Information about the significance of Aboriginal cultural heritage values associated with the Aboriginal objects and places proposed to be harmed will be relevant to the consideration of intergenerational equity and an understanding of the cumulative impacts of a proposal.

Where there is uncertainty, the precautionary principle should also be followed (see below).

The precautionary principle

The precautionary principle states that the lack of full scientific certainty about the threat of harm should not be used as a reason for not taking measures to prevent harm from occurring.

In applying the precautionary principle, decisions should be guided by:

- *a careful evaluation to avoid, wherever practicable, serious or irreversible damage to the environment (which includes cultural heritage)*
- *an assessment of the risk-weighted consequences of various options. The precautionary principle is relevant to OEH consideration of potential harm to Aboriginal cultural heritage where:*
- *the proposal involves a risk of serious or irreversible harm to Aboriginal objects or places or to the value of those objects or places, and*
- *there is a lot of uncertainty about the significance of Aboriginal cultural heritage values of the Aboriginal objects or places proposed to be harmed.*

Where this is the case, a precautionary approach should be taken and all cost-effective measures implemented to prevent or reduce harm to the Aboriginal objects/place.

6.3 Management and mitigation measures

Ideally, heritage management involves conservation of sites through the preservation and conservation of fabric and context within a framework of 'doing as much as necessary, as little as possible' (Marquis-Kyle & Walker 1994, p.13). In cases where conservation is not practical, several options for management are available. For sites, management often involves the salvage of features or artefacts, retrieval of information through excavation or collection (especially where impact cannot be avoided) and interpretation.

Avoidance of impact to archaeological and cultural heritage sites through design of the development is the primary mitigation and management strategy and should be implemented where practicable. Due to the design and the level of bulk earthworks required to make it suitable for development, it is not possible to avoid impacts to Aboriginal sites in the study area.

A conclusion from community consultation is that a new site location for the proposed works should be considered in order to avoid impacts to the highly culturally significant Aboriginal Place within the study area and wider landscape. An outcome from community consultation is that the proposed school should not be built within the study area, due to the culturally significant Aboriginal Place. A new site location for the proposed works should be established in order to avoid impacts to the highly culturally significant Aboriginal Place within the study area and wider landscape.

Impacts to AHIMS 45-5-5821/Guntawong Road 4, AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 are unable to be avoided through redesign an AHIP will need to be obtained for direct impact. The AHIP will also need to allow for community collection of AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 for collection prior to any construction works.

6.3.1 Avoidance through redesign

As per the outcomes of community consultation, it was recommended that DoE should investigate another study area for the development of the new high school in order to avoid impact to the nominated Aboriginal Place *Nanagamay Ngurra*.

DoE assessed three potential sites to develop the Schofields-Tallawong High School to meet current and future demand for public high-school tuition in the area. Optioneering was limited to these three sites based on the high forecasted demographic growth and the limited number of land parcels available for acquisition within the area of service need.

DoE also confirms that based on the Aboriginal cultural heritage investigations, impacts to archaeological site AHIMS 45-5-5766/Guntawong Road 2 have been reduced through redesign. The majority of the AHIMS 45-5-5766/Guntawong Road 2 site within the high school area will now not be impacted and will be conserved and protected from harm as an area of natural drainage overflow. As minor impacts to AHIMS 45-5-5766/Guntawong Road 2 will occur, an AHIP to impact will need to be obtained, a no harm area for the remainder of the site will be fenced to ensure the area is protected.

6.3.2 Continue Aboriginal community consultation

As per the consultation requirements it is recommended that a copy of this report is provided to RAPs. It is also recommended that the proponent should continue to inform RAPs about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project.

6.3.3 Apply for an AHIP to impact AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1

If impacts to AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 cannot be avoided through redesign, it is recommended that an AHIP covering the development footprint be obtained from Heritage NSW prior to impacts occurring. An AHIP is required for any activities likely to have an impact on Aboriginal objects or Places, or that cause land to be disturbed for the purposes of discovering an Aboriginal object. **The AHIP should be for a term of five (5) years.**

A small portion of AHIMS 45-5-5766/Guntawong Road 2 will be impacted by the proposed activity. Due to the low to moderate density of artefacts, no further works is advised. The majority of AHIMS 45-5-5766/Guntawong Road 2 will not be impacted and will be conserved.

The AHIP will allow for impacts to AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 to occur through the proposed development and community collection of 45-5-5913/201 Guntawong Rd Hammerstone 1.

Advice preparing AHIPs

An AHIP is required for any activities likely to have an impact on Aboriginal objects or Places or cause land to be disturbed for the purposes of discovering an Aboriginal object. Heritage NSW issues AHIPs under Part 6 of the NPW Act.

AHIPs should be prepared by a qualified archaeologist and lodged with Heritage NSW. Once the application is lodged processing time can take between 8-12 weeks. It should be noted that there will be an application fee levied by the Heritage NSW for the processing of AHIPs, which is dependent on the estimated total cost of the development project.

6.3.4 Community surface collection of AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1

AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 should be salvaged through community surface collection as part of the AHIP to impact. This ensures that the most information possible is obtained from the sites prior to their destruction. This not only increases current understanding of the site but increases our knowledge of Aboriginal occupation in the wider Blacktown region and ensures that any scientific and cultural information that we obtain can be accessed and used by future generations.

6.3.5 Fencing of AHIMS 45-5-5766/Guntawong Road 2 and area of moderate archaeological potential

Prior to any construction works taking place, the majority of AHIMS 45-5-5766/Guntawong Road 2 and the area of moderate archaeological potential which will not be impacted should be conserved and fenced off and secured, to ensure it will not be harmed by the proposed works. Fencing must remain in place over the over the lifespan of construction phase. Should future development work propose to impact AHIMS 45-5-5766/Guntawong Road 2, then an AHIP will need to be obtained from Heritage NSW. Further archaeological investigation in the form test excavations is not recommended for AHIMS 45-5-5766/Guntawong Road 2 as the site will be avoided through redesign.

6.3.6 Aboriginal Cultural Heritage Management Plan

It is recommended an ACHMP be developed to appropriately manage Aboriginal cultural heritage identified within the study area. An ACHMP sets out specific guidelines and protocols for the management of Aboriginal heritage across the life of the project inclusive of construction and operational use. This should be inclusive of unanticipated finds protocols, the requirement for heritage inductions to be undertaken by the site personnel prior to works, and long-term care and control of Aboriginal archaeological materials. The ACHMP must be prepared by a suitably qualified archaeologist in consultation with the RAPs for the project.

6.3.7 Heritage Interpretation Plan

Given the significance of the region to Aboriginal people, there is an opportunity for heritage interpretation as part of the design. Heritage interpretation is an innovative way to integrate culture into design and can not only honour the deep-rooted connection to the land but also ensure that Aboriginal cultural heritage remains present in the daily operations of the proposed high school. As such, it is recommended that a Heritage Interpretation Plan be prepared by a suitably qualified heritage consultant following the NSW Heritage Council's *Interpreting Heritage Places and Items Guidelines*.

Figure 10 Impact assessment

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7 Recommendations

Strategies have been developed based on the archaeological (significance) of cultural heritage relevant to the study area and influenced by:

- Predicted impacts to Aboriginal cultural heritage.
- The planning approvals framework.
- Current best conservation practise, widely considered to include:
 - Ethos of the Australia ICOMOS Burra Charter.
 - The Code.

Prior to any impacts occurring within the study area, the following is recommended.

Recommendation 1: Continued consultation with the registered Aboriginal parties

It is recommended that DoE continue to inform these groups about the management of Aboriginal cultural heritage sites within the study area throughout the life of the project. This recommendation is in keeping with the consultation requirements.

Recommendation 2: Application for an AHIP to impact AHIMS 45-5-5766/Guntawong Road 2, AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1

If avoidance through redesign is unable to occur, it is recommended that that DoE apply to Heritage NSW, NSW Department of Climate change, Energy, the Environment and Water (Heritage NSW) for an AHIP to destroy AHIMS 45-5-5821/Guntawong Road 4 and AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 and to partially impact AHIMS 45-5-5766/Guntawong Road 2 which are currently protected under the NPW Act. The AHIP should be for a term of five years.

A small portion of AHIMS 45-5-5766/Guntawong Road 2 will be impacted by the proposed activity. Due to the low to moderate density of artefacts, no further works is advised. The majority of AHIMS 45-5-5766/Guntawong Road 2 will not be impacted and will be conserved (refer to Recommendation 3).

It is recommended that the surface stone artefacts associated with AHIMS 45-5-5913/201 Guntawong Rd Hammerstone 1 is collected prior to construction.

Recommendation 3: Fencing of AHIMS 45-5-5766/Guntawong Road 2

Prior to any works taking place, the majority of AHIMS 45-5-5766/Guntawong Road 2 and the area of moderate archaeological potential which will not be impacted are to be conserved and should be clearly fenced to ensure they will not be harmed by the proposed activity. Fencing must remain in place over the lifespan of the construction phase.

Recommendation 4: No further archaeological work required in the area of low potential once AHIP obtained from Heritage NSW

No further archaeological work is required in the area of low potential except in the event that unexpected human remains are unearthed during any phase of the project (refer to Recommendation 7).

Recommendation 5: Discovery of unanticipated Aboriginal objects

All Aboriginal objects and Places are protected under the NPW Act. It is an offence to disturb an Aboriginal site without a consent permit issued by Heritage NSW. Should any unanticipated Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying Heritage NSW and Aboriginal stakeholders.

Recommendation 6: Discovery of unanticipated historical relics

Relics are historical archaeological resources of local or State significance and are protected in NSW under the *Heritage Act 1977*. Relics cannot be disturbed except with a permit or exception/exemption notification. Should unanticipated relics be discovered during the course of the project, work in the vicinity must cease and an archaeologist contacted to make a preliminary assessment of the find. The Heritage Council will require notification if the find is assessed as a relic.

Recommendation 7: Discovery of human remains

If any suspected human remains are discovered during any activity you must:

1. Immediately cease all work at that location and not further move or disturb the remains.
2. Notify the NSW Police and Heritage NSW Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
3. Not recommence work at that location unless authorised in writing by Heritage NSW.

Recommendation 8: Development of an Aboriginal Cultural Heritage Management Plan

It is recommended an Aboriginal Cultural Heritage Management Plan (ACHMP) be developed to appropriately manage Aboriginal cultural heritage identified within the study area. An ACHMP sets out specific guidelines and protocols for the management of Aboriginal heritage across the life of the project inclusive of construction and operational use. This should be inclusive of unanticipated finds protocols, the requirement for heritage inductions to be undertaken by the site personnel prior to works, and long-term care and control of Aboriginal archaeological materials. The ACHMP must be prepared by a suitably qualified archaeologist in consultation with the RAPs for the project.

Recommendation 9: Heritage Interpretation plan

Given the significance of the region to Aboriginal people, there is an opportunity for heritage interpretation as part of the design. Heritage interpretation is an innovative way to integrate culture into design and can not only honour the deep-rooted connection to the land but also ensure that Aboriginal cultural heritage remains present in the daily operations of the proposed high school. As such, it is recommended that a Heritage Interpretation Plan be prepared by a suitably qualified heritage consultant following the NSW Heritage Council's *Interpreting Heritage Places and Items Guidelines*.

Biosis understands that this recommendation has been captured within the Connecting with Country program undertaken by DoE.

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Appendices

Appendix 1 AHIMS results

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