

URBIS

# Aboriginal Objects Due Diligence Assessment

Bungendore High School  
Ngambri Country

Prepared for  
**NSW Department of Education**  
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# Executive Summary

Urbis has been engaged by the NSW Department of Education (DoE) ('the Proponent') to conduct an Aboriginal Objects Due Diligence Assessment ('ADD') of 18 Harp Avenue, Bungendore, NSW, legally defined as Lot 125/DP 1297613 ('the subject area').

The proponent is proposing the construction and operation of a new high school known as 'Bungendore High School'. The new high school will accommodate 600 students and will involve the construction of three buildings including two learning hubs and a school hall. The ADD was undertaken to determine whether any Aboriginal objects or Aboriginal places are likely to be harmed by the proposed development of the subject area.

The ADD was undertaken in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW, 2010) ('Due Diligence Code') and included the following:

- Searches of the Australian Heritage Database ('AHD'), Aboriginal Heritage Information Management System ('AHIMS') and State Heritage Inventory ('SHI')
- Review of previous archaeological assessments relevant to the subject area
- Landscape analysis
- Analysis of historical land use and its impact on the subject area
- Visual inspection of the subject area

The due diligence assessment concluded that:

- 1) The proposed activity is not a 'low impact activity' and will disturb the ground surface.
- 2) There are no known Aboriginal objects or Aboriginal places within the subject area.
- 3) Past reports indicate the area surrounding the present subject area has potential to retain archaeological remains; however, the present subject area itself is considered unlikely to contain such remains.
- 4) The subject area is located within 200 m of natural water which are considered as sensitive landscape features indicative of past Aboriginal land use.
- 5) The entire subject area has been subjected to ground disturbance that has changed the land's surface, and which remains clear and observable.
- 6) In accordance with the due diligence process described in the Due Diligence Code, the above assessment has determined that no further investigation is required for the subject area. Based on the above conclusions, Urbis recommends the following:

- **Recommendation 1 – Record Keeping**

This ADD report should be kept as evidence of the Due Diligence Process having been applied to the subject area.

- **Recommendation 2 – No Further Investigation**

The development may proceed with caution, subject to the following archaeological chance finds and human remains procedures being implemented and followed.

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

Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.

3. The nominated archaeologist must assess the find and its potential extent.
4. If impacts to the identified site extent are required, an Aboriginal Cultural Heritage Assessment Report (ACHAR) and an Aboriginal Heritage Impact Permit (AHIP) application process must be undertaken.
6. Works in the vicinity of the find can only recommence only after an AHIP is granted from Heritage NSW.

▪ **Recommendation 4 – Human Remains Procedure**

In the unlikely event that human remains are uncovered during the proposed works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
5. Works are not to recommence until the find has been appropriately managed.

# 1. Introduction

Urbis has been engaged by the NSW Department of Education (DoE) ('the Proponent') to conduct an Aboriginal Objects Due Diligence Assessment ('ADD') of 18 Harp Avenue, Bungendore legally defined as Lot 125/DP1297613 ('the subject area'). The regional location and boundary of the subject area are shown in Figure 3 and Figure 4, respectively.

The proponent has proposed the construction and operation of a new high school known as Bungendore High School. The new high school will accommodate 600 students and will involve the construction of three buildings including two learning hubs and a school hall, and an agricultural building.

This ADD has been prepared to support a Review of Environmental Factors (REF) for the NSW DoE for the construction and operation of the new Bungendore High School (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 the *Environmental Planning and Assessment Act 1979* (EP&A Act). The activity is to be undertaken pursuant to Chapter 3, Part 3.4, Section 3.37A 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 (DPHI), and the Addendum Guidelines for health service facilities and schools.

The ADD has been prepared to meet the requirements for due diligence under the *National Parks and Wildlife Act 1974* (NSW). The ADD follows the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010a) ('the Due Diligence Code') and aims to establish whether any Aboriginal objects or Aboriginal places would be harmed, or would be likely to be harmed, by the proposed activity and to ascertain whether further investigation is required.

In 2021, Past Traces Heritage Consultants conducted an Aboriginal Cultural Heritage Assessment Report (ACHAR) that encompassed a much larger study area, including the present subject area. The report concluded that there is no potential for Aboriginal objects within the present subject area. Although an Aboriginal Heritage Impact Permit (AHIP) was issued for a proximate region to the southwest, this permit does not extend to the current subject area (see Figure 1).

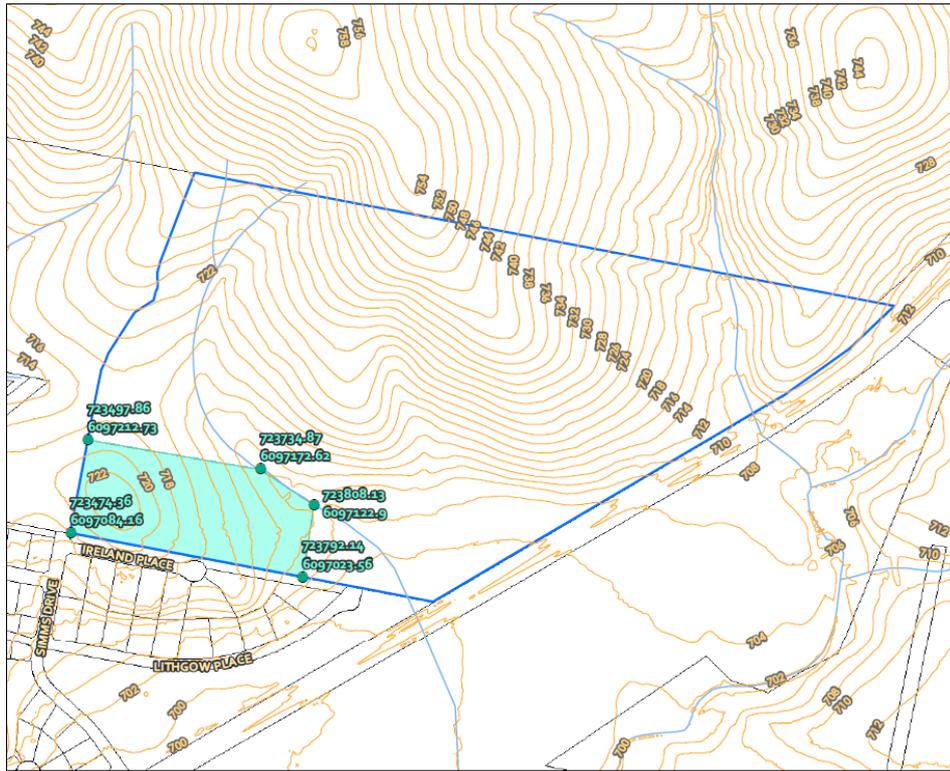


Figure 7: AHIP Area

Figure 1 – Map depicting the extent of registered AHIP 4962 within the broader subject area of Past Traces Heritage Consultants (2021) ACHAR.

Source: Past Traces Heritage Consultants, 2021

## 1.1. Subject Area

The current street address is part of 18 Harp Avenue, Bungendore, NSW, 2621 (the site), and is legally described as part Lot 125 in Deposited Plan 1297613. As shown in Figure 2, the proposed school site forms part of a larger lot which is the subject of a proposed residential subdivision.

The site is located within the North Bungendore Precinct (Elm Grove Estate) in Bungendore. As a result of precinct wide rezonings, the surrounding locality is currently transitioning from a semi-rural residential area to an urbanised area with new low density residential development.

The site is zoned R2 Low Density Residential, with all adjoining land also zoned R2 Low Density Residential.

The site has three frontages:

- Approx 500m southern frontage to Birchfield Drive.
- Approx 500m northern frontage to Bridget Avenue.
- Approx 100m eastern frontage to Winyu Rise.

The site is currently cleared of all vegetation and consists of grassland, having been prepared for the purposes of future low density residential development.



Figure 2 - Aerial Photograph of the Site

Source: Urbis, 2024

## 1.2. Proposed Works

The proposed activity is for the construction and operation of a new high school in Bungendore at part 18 Harp Avenue, Bungendore (the **site**). The new high school will accommodate 600 students and 68 staff. The school will provide 26 general learning spaces, and three support learning spaces across two buildings. The buildings will be predominantly three-storeys in height and will include permanent and support teaching spaces, specialist learning hubs, a library, administrative areas and a staff hub.

Additional core facilities are also proposed including a standalone school hall with covered outdoor learning area (**COLA**), a car park, a kiss and drop zone along Birchfield Drive, sports courts and a sports field. The new school also features a single storey building with associated paddocks in the far western portion of the site designed for livestock management and hands-on agricultural learning.

Specifically, the proposal involves the following:

- Building A, a three-storey learning hub accommodating general learning spaces, a special education learning unit (**SELU**), a physical education centre, a performing arts space, and other core facilities including administrative areas, staff hub, library and end of trip facilities.
- Building B, a part three/part four storey learning hub accommodating general learning spaces, specialist workshops for food, textile, wood and metal workshops, as well as visual arts studios, science labs and staff areas.
- Building C, a standalone school hall with COLA.
- Building D, a single-storey agricultural block comprising an animal storage space, a COLA and internal workshop.
- On-site staff car park with 50 spaces with access via Bridget Avenue.
- Kiss and drop zones and bus bays along Birchfield Drive.
- Open play space including a sports courts and sports field.

- Associated utilities and services including a 1000kv padmount substation.
- Main pedestrian entrance to be located off Birchfield Drive.
- Secondary pedestrian access from Bridget Avenue.
- Public domain/off-site works including the removal of street trees.

The design has been masterplanned to allow for an additional future stage. The second stage does not form part of this proposal.

## 1.3. Statutory Controls

### 1.3.1. Environment Protection and Biodiversity Conservation Act 1999

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

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

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

Properties and places listed on the WHL, NHL or CHL, are included in the Australian Heritage Database ('AHD'). The AHD also includes places under consideration, or that may have been considered, for any one of these lists. A search of the AHD was undertaken on 12/12/2024. The search did not identify any Aboriginal heritage properties or places within the subject area that are protected under the EPBC Act.

### 1.3.2. The National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (NSW) ('the NPW Act') and *National Parks and Wildlife Regulation 2019* (NSW) ('the NPW Reg') protect 'Aboriginal objects' and 'Aboriginal places' in NSW.

The NPW Act defines 'Aboriginal objects' and 'Aboriginal places' as follows:

- **Aboriginal object** means any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.
- **Aboriginal place** means any place, which may or may not contain Aboriginal objects, that is declared to be an Aboriginal place under section 84 of the NPW Act because it is or was of special significance with respect to Aboriginal culture.

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

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

Regulation 58 of the NPW Reg defines 'low impact' activities as:

- Maintenance of existing roads, fire and other trails and tracks and existing utilities and other similar services, on disturbed land.
- Farming and land management work for cropping and leaving paddocks fallow, the construction of water storage works, the construction of fences, the construction of irrigation infrastructure, ground water bores or flood mitigation works, or the construction of erosion control or soil conservation works (such as contour banks), on disturbed land.
- Farming and land management work that involved the maintenance of existing grain, fibre or fertiliser storage areas, existing water storage works, existing irrigation infrastructure, ground water bores or flood mitigation works, existing fences, or existing erosion control or soil conservation works.
- The grazing of animals.
- An activity on land that has been disturbed that comprises exempt development or was the subject of a complying development certificate issued under the *Environmental Planning and Assessment Act 1979*.
- Mining exploration work that involved costeaning, bulk sampling or drilling, on disturbed land.
- Geological mapping, surface geophysical surveys (excluding seismic surveys), sub-surface geophysical surveys that involve downhole logging and sampling and coring using hand-held equipment (except when carried out as part of an archaeological investigation).
- The removal of isolated, dead or dying vegetation, but only if there is minimal disturbance to the surrounding ground surface.
- Seismic surveying and the construction and maintenance of ground water monitoring bores on disturbed land.
- Environmental rehabilitation work (excluding erosion control or soil conservation works).

For the purposes of the above, land is 'disturbed' if it has been the subject of a human activity that has changed the land's surface, being changes that remain clear and observable (reg. 58(4)).

The proposed works described in Section 1.2 above are not 'low impact' activities as defined in reg. 58 of the NPW Reg. Therefore, the present ADD was undertaken to exercise due diligence to determine whether the proposed activity would harm an Aboriginal object or Aboriginal place.

## 1.4. Methodology

In accordance with section 87(3) of the NPW Act, due diligence may be exercised by compliance with the requirements set out in the NPW Regulation or a code of practice adopted or prescribed by the NPW Regulation.

The present ADD was undertaken in accordance with the generic due diligence process described in Section 8 of the Due Diligence Code. It is noted that there is an inconsistency between the due diligence process depicted in the flowchart on page 10 of the Due Diligence Code and the process described on pages 11 to 14. The latter was adopted in *Williams v Graham* [2016] NSWLEC 151 and has been applied for the present ADD.

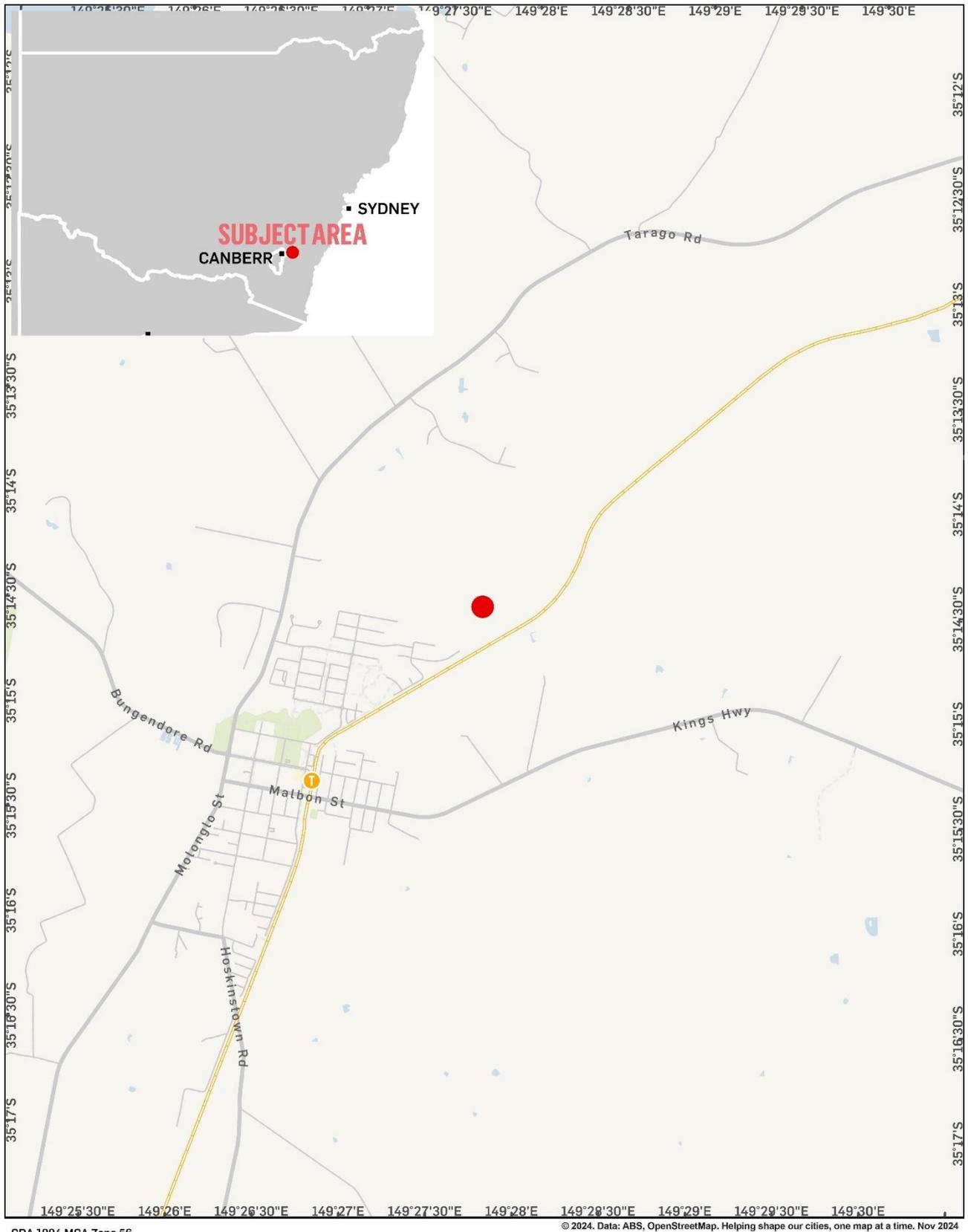
The ADD included the following:

- Searches of the Australian Heritage Database ('AHD'), Aboriginal Heritage Information Management System ('AHIMS') and State Heritage Inventory ('SHI')
- Review of previous archaeological assessments relevant to the subject area
- Landscape analysis
- Analysis of historical land use and its impact on the subject area
- Visual inspection of the subject area

## 1.5. Limitations

The ADD is limited to consideration of Aboriginal objects and places. Historical heritage properties and places protected under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) and historical heritage items and relics protected under the *Heritage Act 1977* (NSW) are not considered.

The ADD is limited to the due diligence process outlined in the Due Diligence Code. The ADD did not include consultation with the Aboriginal community or consideration of intangible cultural heritage.



GDA 1994 MGA Zone 56  
 Project No: P0055724  
 Project Manager: Ali Byrne  
 ● Subject Area

**REGIONAL LOCATION**  
 Bungendore High School  
 School Infrastructure NSW

Figure 3 – Regional location of the subject area



GDA 1994 MGA Zone 56

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100 M

Project No: P0055724  
Project Manager: Ali Byrne

Subject Area    Contours    Hydrology    Ephemeral

## LOCATION OF THE SUBJECT AREA

### Bungendore High School School Infrastructure NSW

Figure 4 – Subject area

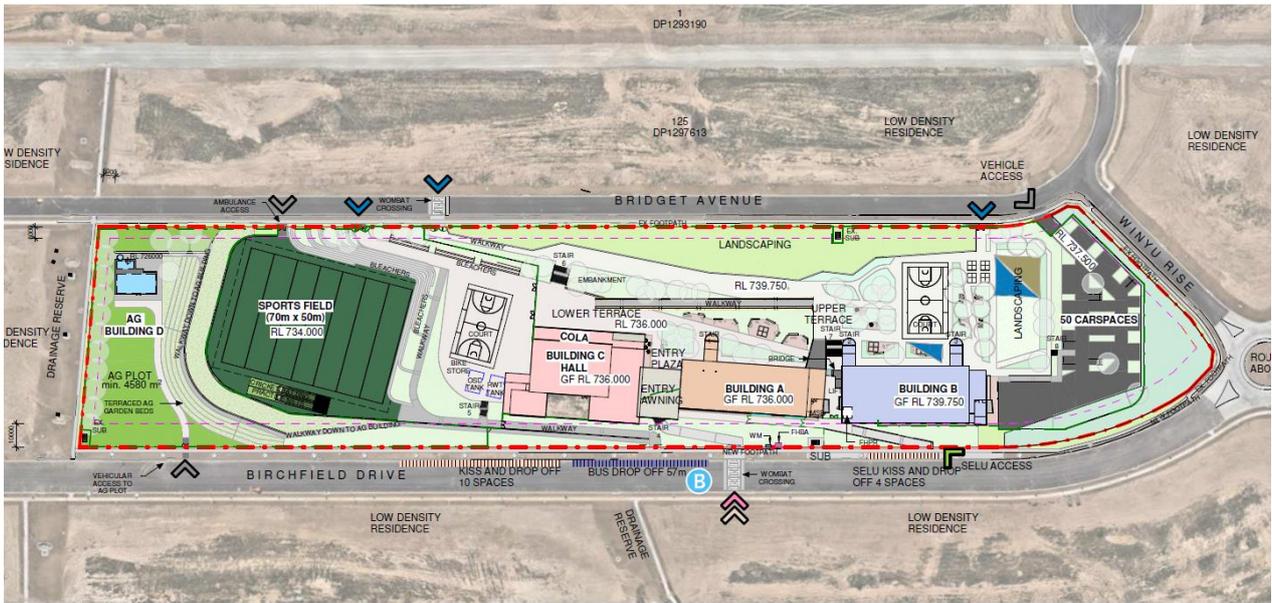


Figure 5 – Site Plan

Source: NBRS, 2024

## 2. Aboriginal Cultural Heritage

The following discussion of archaeological context, environmental context and the visual inspection of the subject area provides the relevant background information necessary for applying the due diligence process to the subject area.

### 2.1. Archaeological Context

#### 2.1.1. Declared Aboriginal Places

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

A search of the SHI was undertaken on 12/11/2024. No heritage items were identified within the subject area.

#### 2.1.2. Registered Aboriginal Objects

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

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

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

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

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

A search of the Aboriginal Heritage Information Management System (AHIMS) was carried out on 13/11/2024 (AHIMS Client Service IDs: 949924 and 949925 for an area of approximately 1 km x 1 km centred on the subject area. A summary of all previously registered Aboriginal objects and Aboriginal places within the search area is provided in **Error! Reference source not found.** and their spatial distribution is shown in **Error! Reference source not found.**. The Basic and Extensive AHIMS search results are included in Appendix A. The results of the search are discussed below.

The search was undertaken to determine if:

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

A total of 13 Aboriginal sites are registered in the broader search area. The locations of the 13 identified Aboriginal sites are shown in Figure 6.

The search did not identify any Aboriginal objects or Aboriginal places within the curtilage of the subject area. However, the search did identify several Aboriginal objects and Aboriginal sites that occur within 500m of the study area. The two closest site cards indicate potential for artefacts to extend into the present subject area based on their shared landscape features and proximity to waterways. These are sites described below:

- AHIMS site card #57-2-1132: Located approximately 125m west of the subject area, a series of test pits were excavated across an area of middle slopes on a descending spur line crest. A total of five stone artefacts were recovered from four test pits across the slope. As noted by the site card, the study area has been subject to clearance of natural vegetation, and agricultural practices such as ploughing that may have caused ground disturbance.
- AHIMS site card #57-2-1133: Located approximately 285m west of the subject area, a singular artefact was recovered from a test pit. No other test pits held artefacts across the landform.

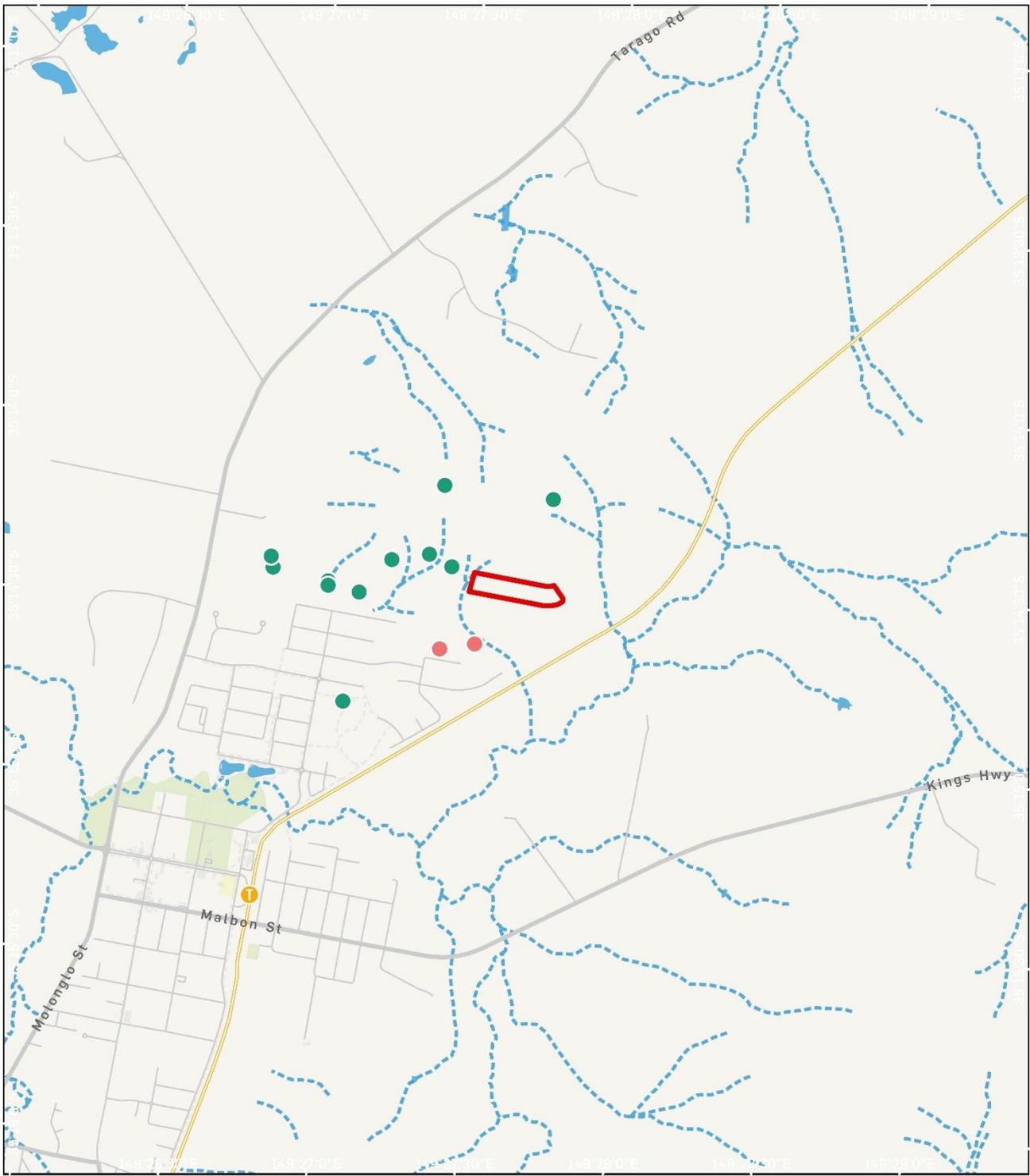
### 2.1.3. Site Features and Contexts

A summary of the site features spread across the registered Aboriginal sites within the search area is provided in Table 1. Among the 13 registered Aboriginal sites in the search area, a total of 15 site features were identified of 2 different types: Artefact and PAD. Of these registered sites, artefacts are represented in all sites (n=13) and account for 87% of site features. The high representation of artefact sites is consistent with the important role of stone tools in the everyday lives of Aboriginal people. PADs are represented in 15% of all sites, and account for 13% of all registered site features. All sites are (n=13) are registered as open contexts reflective of the flat undulating fields that characterised the landscape.

Artefact deposits within the search area are located in proximity to both eastern and western natural streams, respectively. These associations indicate the importance of waterways as sources of food, and are consistent with the general predictive model for NSW, which consider natural waterways (including creeks or first order water catchments) to be indicative of likely past Aboriginal land use.

Table 1 – A summary of registered Aboriginal sites in AHIMS search area

Site Features	Number	% of Sites	% of Features
Artefact	13	100%	87%
PAD	2	15%	13%



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**AHIMS SITES IN EXTENSIVE SEARCH AREA**  
**Bungendore High School**  
**School Infrastructure NSW**

Project No: P0055724  
 Project Manager: Ali Byrne

Subject Area  
  Hydrology  
 ● Artefact  
 ● Open Context  
- - - Ephemeral  
 ● Artefact, PAD

Figure 6 – An extensive search of registered AHIMS sites within the study area

## 2.1.4. Previous Archaeological Investigations

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

### 2.1.4.1. Investigations of the Subject area

#### *Past Traces Heritage Consultants, 2021, Elm Grove Bungendore - Stage 2A and 2B Residential Subdivision 174 Tarago Road Bungendore – Aboriginal Cultural Heritage Assessment Report*

In 2021, Past Traces Heritage Consultants undertook an archaeological investigation in preparation of the residential Subdivision of 174 Tarago Road, Bungendore. The present subject area was included within the boundaries of this assessment. The investigation highlighted several areas with a high likelihood of containing potential archaeological deposits. Among these, the 'proposed PAD 8' is of particular relevance due to its intersection with the present subject area. Given its position, this landform was considered to have moderate potential. Consequently, four sections were tested: the crest, upper slopes, middle slopes, and lower slopes.

On the crest feature, two transects consisting of two test pits each (n=4) were completed. Additionally, ten test pits were excavated at each of the other three locations along the slopes. No artefacts were identified in any of these locations. The soils within the test pits consisted of silty loam overlaying a compacted red silty clay base. The soil profile was shallower on the crest (<20cm) and increased in depth along the slopes, reaching up to 40cm in the lower slopes.

The test pitting program demonstrated that no subsurface deposits are present in the area of PAD 8, despite the landform being considered potentially significant based on predictive modelling. The results of the test pitting program do not align with the landform modelling outcomes from the Stage 1 test pitting and other heritage assessments conducted in the Bungendore region.

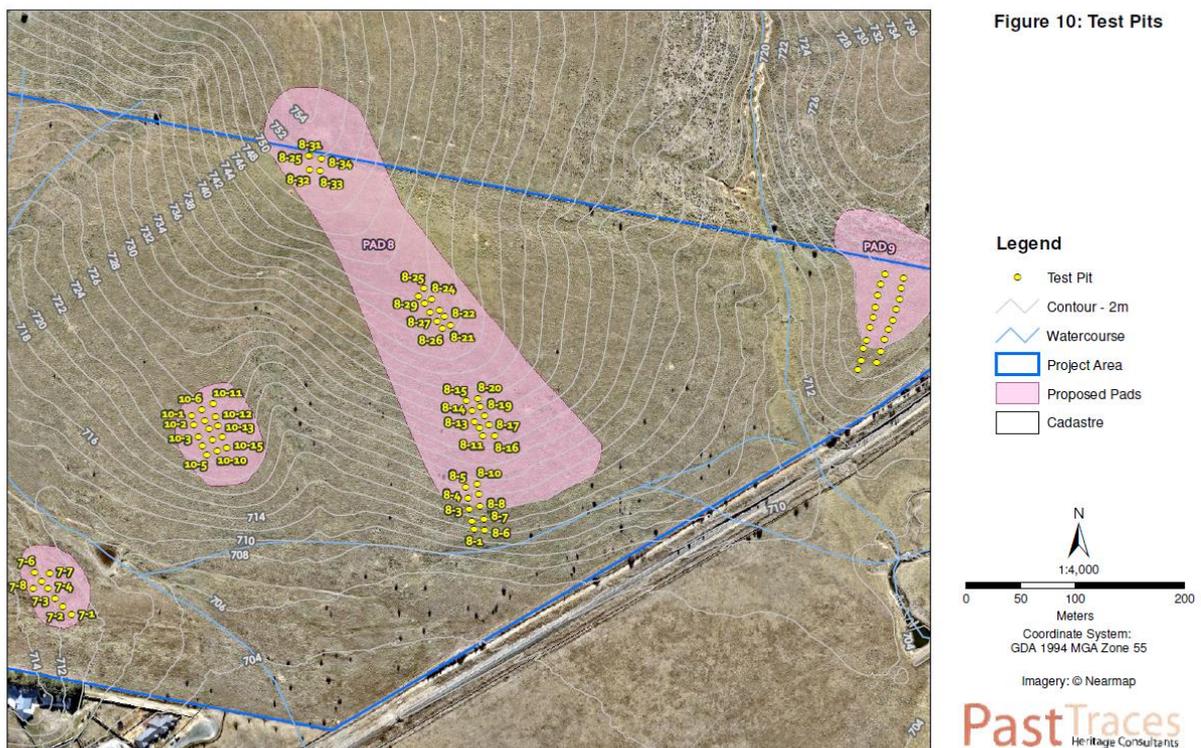


Figure 10: Test Pits

Figure 7 – Map extracted from Past Traces Heritage Consultants illustrating the approximate location of the proposed PAD 8.

Source: Past Traces Heritage Consultants, 2021

#### **2.1.4.2. Regional Investigations**

A number of investigations have been undertaken in the broader region. The most relevant investigations to the present subject area are discussed below. Distance to the subject area, landscape similarities and proximity to natural watercourses were considered as criteria in which to select the investigations below.

##### ***Patricia Saunders' Archaeological Heritage Surveys, 2002, Elmslea Estate Bungendore Aboriginal Archaeological Assessment.***

In 2002, Patricia Saunders undertook an archaeological investigation of an estate stretching from Tarago Road to Turallo Terrace in northern Bungendore, approximately 1.7m south-west of the present subject area. The archaeological investigation consisted of a desktop assessment and site survey. The report concluded due to significant ground disturbance associated with this site, that it would be unlikely for sub surface archaeological deposits to remain intact. However, it was noted that there was potential for subsurface artefacts along the Turallo Creek, particularly on terraces. Recommendations from this report included that further archaeological investigation would be required if ground disturbing works were conducted within proximity (100m) to Turallo Creek.

##### ***Patricia Saunders' Archaeological Heritage Surveys, 2004, Elmslea Estate Bungendore Archaeological Subsurface Testing Program***

In accordance with the recommendations of the Aboriginal Archaeological Assessment, PSAHS carried out a subsurface testing program across 7.5 hectares of floodplain within 100 meters of the northern margin of Turallo Creek. Soil testing revealed a depth of less than 2.9 meters of alluvium. The subsurface testing comprised three transects dug to a maximum depth of 30 cm. These transects, covering a total area of 3,459 m<sup>2</sup>, yielded 103 artefacts. The analysis of these artefacts showed that quartz was the most commonly used material, followed by chert, silcrete, and quartzite. Additionally, the presence of flaked green bottle glass points to post-European Aboriginal occupation in the area.

The findings indicate a widespread, low-density Aboriginal site with scattered concentrations of stone tools across the Turallo Creek floodplain. The site was classified as having moderate archaeological and scientific significance, while its cultural importance to the Ngunnawal community was noted at a local level. Based on these results, the following recommendations were made submission of a Section 90 Consent (now referred to as an AHIP), establishment of an unexpected finds protocol, and the installation of interpretive signage to recognise the Aboriginal heritage.

##### ***Patricia Saunders' Archaeological Heritage Surveys, 2005, Proposed Residential Subdivision Lot 1 DP 747767, Lot 1 DP 193988, and Village Lots 273, 275 and 279, Bungendore, NSW Archaeological Assessment***

In 2005, PSAHS conducted an archaeological investigation of Lot 1 DP 747767, Lot 1 DP 193988, and Village Lots 273, 275 and 279 in Bungendore as part of a development and rezoning plan. The study area is located approximately 1.7km south of the present subject area. The archaeological assessment comprised a desktop assessment and survey of the study area identifying no Aboriginal artefacts. However, five areas were noted for their potential to contain aboriginal objects (PADs). These areas were considered highly sensitive for archaeological material in proximity to Turallo Creek. The report concluded that a test pitting program would be necessary to assess PADs if future ground disturbing works were conducted in proximity to Turallo Creek.

##### ***Biosis, 2016, North Bungendore Planning Proposal Aboriginal Cultural Heritage Due Diligence Assessment.***

In 2016, Biosis undertook an Aboriginal Due Diligence Assessment of Lot 1 DP 798111 and Lot 1 DP 880087, approximately 2.3km south-west of the present subject area. The investigation consisted of a desktop assessment which identified 39 Aboriginal sites within a 10km radius of the site. An additional archaeological survey of the site uncovered two isolated artefacts, two artefact scatters, one culturally modified tree, and areas with potential archaeological deposits. The isolated artefacts included a quartz flake found on the surface of a vehicle access track in a lower slope area, and a quartz core located on a hilltop. Artefact scatter *NBA1* was identified along the surface of the vehicle access track, also within the lower slope

landform, and consisted of two quartz flakes. Artefact scatter *NB3*, situated in a sandy depression next to a raised sandy ridge, contained five lithic artefacts: one chert-backed blade, one complete silcrete flake, one lateral silcrete flake, one distal silcrete flake, and one distal quartz flake. Additionally, a culturally modified tree, displaying eight scars along its trunk and 4-6 cm steel axe marks, was found in a saddle between two crests.

The recommendations indicated rezoning could proceed within the planning proposal area without further archaeological investigation. However, it was advised that additional assessments—including an Aboriginal Cultural Heritage Assessment (ACHA), test excavation, and an Archaeological Technical Report (ATR)—be carried out prior to any ground disturbance activities in the study area.

### ***Ecological Australia, 2021, New High School in Bungendore: Aboriginal Cultural Heritage Assessment***

In 2021, Ecological Australia undertook an archaeological investigation an area comprising Bungendore Park bounded by Gibraltar St, Majara Street, Turallo Terrace and Butmaroo St (Mick Sherd Site), the former Palerang Council site at 10 Majara Street, the Majara Street Road reserve bounded by Turallo Terrace and Gibraltar Streets and Nos. 2, 4 and 6 Majara Street. In relation to the current study, the site is located approximately 1.6km south-west. The investigation entailed a desktop assessment and survey of the site. The report concluded no Aboriginal sites were identified within the study area. This was attributed to the high disturbance associated with the construction of the extant primary school and recreational facilities. Across the site, the report found the area to be equally affected by high ground disturbance, and thus, all sections of the study area were found to have a low archaeological potential.

## **2.1.5. Registered AHIPS**

<b>Date Accepted</b>	<b>Project Name</b>	<b>Address</b>	<b>LGA</b>	<b>AHIP No. (AHIMS)</b>	<b>AHIP schedules</b>
30/04/2021	Elm Grove residential development Stage 1	174 Tarago Road Bungendore 2621	Queanbeyan - Palerang Regional	4760	Certain Aboriginal objects must not be harmed, Salvage excavations, Harm to certain Aboriginal objects through the proposed works, Other action causing harm
6/06/2022	Land Subdivision - Elm Grove Residential Development, Stage 2A and Stage 2B - Tarago Road, Bungendore	Tarago Road, Bungendore - Lot 1 DP 798111	Queanbeyan - Palerang Regional	4962	Salvage excavations, Harm to certain Aboriginal objects through the proposed works



**AHIP Map**  
 18 Harp Avenue, Bungendore, NSW  
 Project Number: P0055724

Scale: 1:6,000  
 Size: A4  
 Date: 14-01-2025

0 200 400 m



## Salvage Excavation Summary of AHIP:4962

*The summary of excavation findings is extracted from Past Traces Heritage Consultants (2021) Compliance Salvage Report.*

The salvage excavations surrounding Test pit 161 at site 57-2-1131 yielded a low number of artefacts, providing limited data to answer the research questions. The soil profiles from the excavated test pits showed mixed profiles with clear bioturbation, indicating past ploughing and pasture improvement, which likely mixed artefact positions and affected temporal positioning.

The artefact assemblage, dominated by unretouched and very small quartz flakes, suggests core reduction activities with evidence of on-site manufacture of retouched flakes and backed artefacts. The high-density area around Test pit 161 indicates a single knapping event amid a background scatter. Quartz was locally available, negating the need for intensive reduction or raw material conservation, while exotic materials were brought to the site already decorticated and resharpened before being transported elsewhere. Compared to other sites in the vicinity, the Elm Grove site primarily consists of local white quartz, similar to other sites in the Bungendore region. The assemblage is low in density and numbers compared to larger sites in the region, with a low rate of use wear and retouch. The site's location near Lake George would have provided access to resources and travel routes.

The homogeneity of raw materials, mainly quartz, precluded analysis of variations in raw material types or usage within the site. The low frequencies of cores, retouched flakes, and use wear across both Stage 1 and the current salvage were insufficient for statistically valid comparisons of artefact locations or spatial distributions. The evidence suggests low-level on-site manufacture, likely a single flaking event or by a single knapper. The assemblage shows an overwhelming abundance of quartz, with minimal exotic materials like chert, chalcedony, or volcanics. The absence of cores or retouched items made from exotic materials suggests these were worked or maintained on-site, with primary production occurring elsewhere. Quartz was locally available and not heavily reduced, with cores discarded before exhaustion and minimal retouch on flakes.

The salvage program identified a small subsurface deposit around Test pit 161, indicative of artefact repair/manufacture at site 57-2-1131 (ELM6). The assemblage includes mainly unretouched and very small

quartz flakes, indicating core reduction. The findings suggest short-term or repeated occupation by small groups traveling through the area along known access routes.

Due to the residential development at 174 Tarago Road Bungendore (Elm Grove Stage 2), avoidance of the identified heritage sites was not possible. The salvage program aimed to minimise the loss of archaeological information and site patterning. The program was effective, defining the high-density area of Test pit 161 and allowing comparison with regional sites. The salvaged artefacts will remain in temporary storage at the Canberra offices of Past Traces until approval for placement with the Ngambri Local Aboriginal Land Council is granted by NSW Heritage.

Considering that AHIP 4962 is located approximately 260 meters south of the present subject area, it is important to acknowledge its significance in providing valuable insights into potential findings within the current subject area.

## 2.2. Environmental Context

### 2.2.1. Landscape Features

Aboriginal objects may be associated with certain landscape features that played a part in the everyday lives and traditional cultural activities of Aboriginal people. The Due Diligence Code specifies the following landscape features are indicative of likely past Aboriginal land use:

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

The above landscape features are defined in the Glossary of this report. Only the terms 'waters' and 'dune' are explicitly defined in the Due Diligence Code.

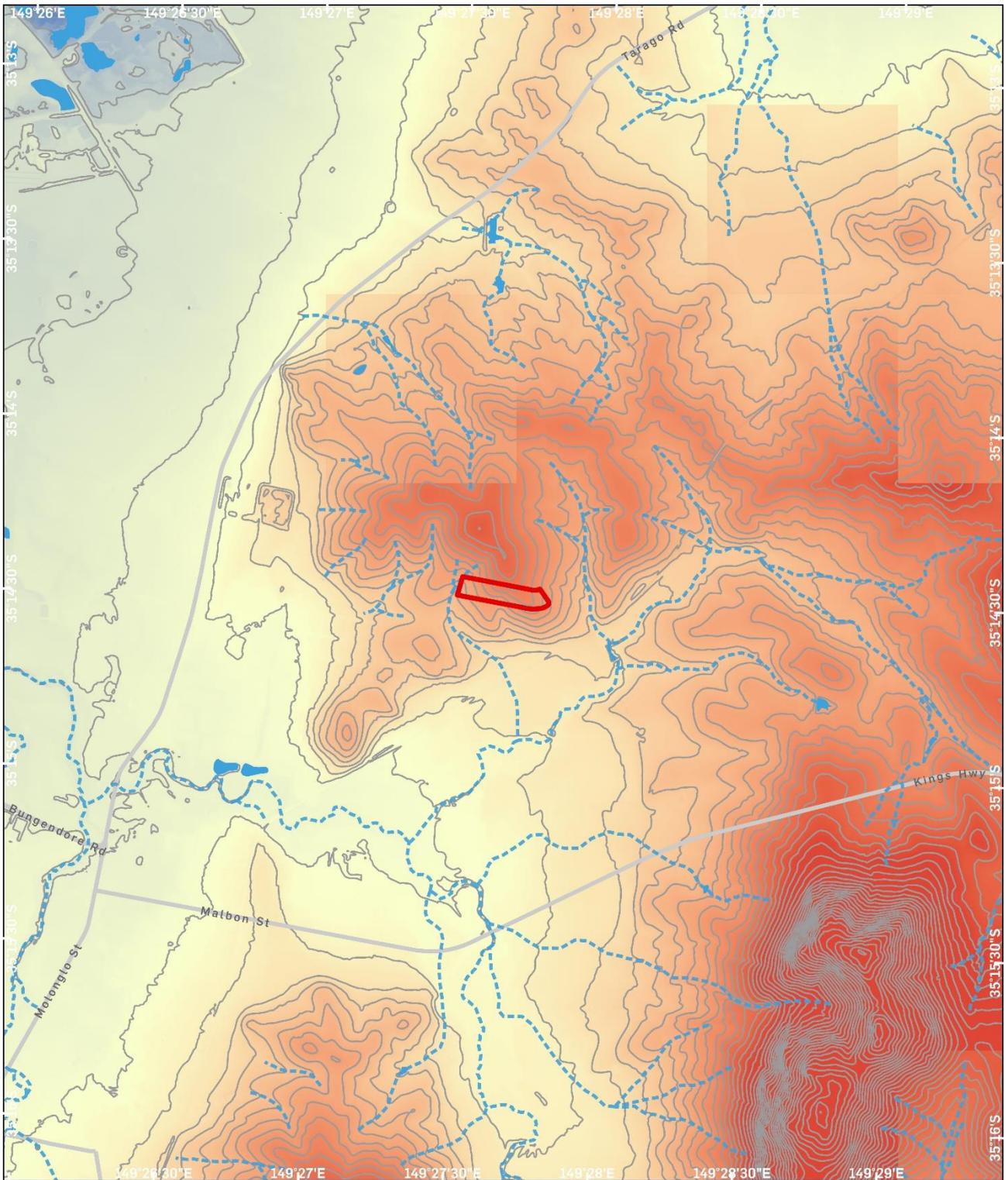
**Topography:** The subject area is located on a lower side-slope of a broad ridge (Figure 8).

**Soils and Geology:** The NSW Soil and Land Information System (SALIS) indicates that the subject area is located within the Bywong (by) soil landscape (Figure 9). The Bywong soil landscape is characterised by vestigial topsoils on undulating to rolling hills. Soil material and profile depth is highly variable due to the variations in the steeply dipping substrate, which may change over as little as a few metres. Hence, two types of soil profiles (comprised of A1, A2 and B2 horizons) are applicable to the subject area. Type 1 typically covers 50% of the landscape reaching a maximum depth of 80cm. Horizon A1 is noted as dark brown sandy loam occurring as deep as 10cm, while A2 is noted as a greyish yellow brown occurring as deep as 32cm. Horizon B is noted as a yellowish-brown clay occurring at a maximum depth of 80cm.

Type 2 is less common occurring in only 30% of the Bywong soil landscape, however the depth of this soil type far exceeds that of the previous soil type. Horizon A1 is noted as dark brown loam occurring at depths of 12cm, whilst A2, described as brown bleached silty clay loam occurs at depths of 12-44cms. Horizon B noted as yellowish brown light medium clay may occur at depths as great as 110cm.

Severe to very severe gully erosion 1.5 – 3 m deep occurs in the drainage lines from mid to lower slopes where the subject area is located. There is no evidence of rock out crops within the study area.

**Hydrology:** The nearest natural waterway is located 125m east of the subject area. There is no historical evidence to suggest the study area was ever located closer to a natural waterway. Nonetheless, the proximity between the extant first order stream and subject area is considered indicative of likely past Aboriginal land use under the predictive model adopted for the present assessment.



GDA 1994 MGA Zone 56

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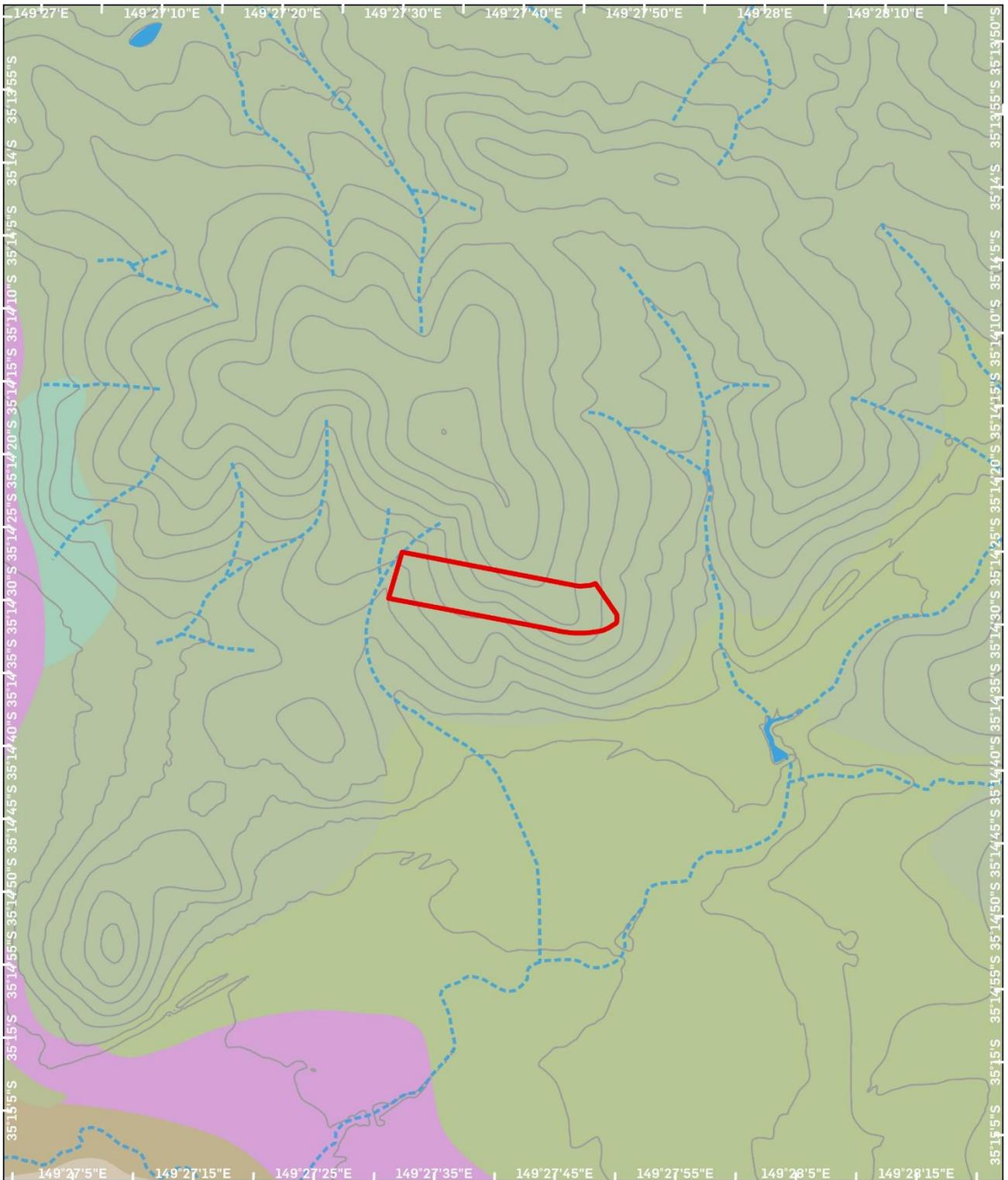
1 KM

Project No: P0055724  
Project Manager: Ali Byrne

	Subject Area		Ephemeral	<b>Elevation (m)</b>		896
	Hydrology		Contours			670

**TOPOGRAPHY**  
Bungendore High School  
School Infrastructure NSW

Figure 8 – Topography



GDA 1994 MGA Zone 56

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500 M

## SOIL LANDSCAPES AND HYDROLOGY

Bungendore High School  
School Infrastructure NSW

Project No: P0055724

Project Manager: Ali Byrne

Subject Area

— Contours

Hydrology

BUNGENDORE (TRANSFERRAL)

COOPERS variant a (BEACH)

HALFWAY CREEK (ALLUVIAL)

Ephemeral

BYWONG (VESTIGIAL)

HOSKINSTOWN variant a (VESTIGIAL)

COOPERS (BEACH)

MILLPOST (TRANSFERRAL)

Figure 9 – Soil landscapes and hydrology

## 2.2.2. Historical Ground Disturbance

Disturbance to the landscape after Aboriginal use reduces the likelihood for Aboriginal objects being retained, either through destruction of the Aboriginal objects or their removal.

According to the Due Diligence Code, land is disturbed if it has been the subject of a human activity that has changed the surface of the land, being changes that remain clear and observable. The Due Diligence Code provides the following examples of activities that may have disturbed land:

- Ploughing
- Construction of rural infrastructure (such as dams and fences)
- Construction of roads, trails and tracks (including fire trails and tracks and walking tracks)
- Clearing vegetation
- Construction of buildings and the erection of other structures
- Construction or installation of utilities and other similar services (such as above or below ground electrical infrastructure, water or sewerage pipelines, stormwater drainage and other similar infrastructure)
- Construction of earthworks

Due to a paucity in historical documentation regarding the development of Bungendore, specifically the subject area, this report bases its understanding of the historical ground disturbance upon recent aerial images. In 2017, the subject appears to be a part of a larger unoccupied field with no clear evidence of ground disturbance other than the initial clearance of the endemic native forest and woodland that characterised the region prior to colonisation (Jenkins, 2000) (see Figure 10). By 2022, the subject area has been impacted by the development and further subdivision of the estate that would likely entail earthworks and leveling of the study area (see Figure 11).

Taken together, the area has been subject to clear and observable human activity that has changed the land's surface from 2017 to 2022. All areas of the subject area appear to have been equally impacted by ground disturbing works. In light of the moderately shallow natural topsoil associated with the Bywong soil landscape, historical ground disturbance has been assessed as **High** throughout the entirety of the subject area.



Figure 10 - Aerial imagery of the subject area (red outline) [2017]

Source: Near Maps, 2024



Figure 11 – Aerial imagery of the subject area (red outline) [2022]

Source: Near Maps, 2024

## 2.3. Visual Inspection

A visual inspection of the subject area was undertaken to further investigate the environmental context of the subject area and to determine if any Aboriginal objects were present as surface expressions. The visual inspection of the subject area was undertaken by Ali Byrne (Urbis Associate Director) on 27 November 2024.

The visual inspection was undertaken in dry, windy conditions. The subject area is located within an area which has been previously cleared and stripped in preparation for residential development. Ground Surface Visibility (GSV) was estimated to be about 20% across the subject area due to ground-covering vegetation, primarily comprising grasses and thistles, with intermittent areas of thinned vegetation. Where soils were exposed, they revealed gravelly red-brown clay, confirming that the topsoils have been stripped as part of previous works. Quartz and shale gravels were observed across the exposed soils.

In addition to the topsoil stripping, previous works undertaken in the area included installation of underground services along the northern boundary, as well as footpaths and two substations.

The area is highly disturbed as a result of the previous pre-construction preparation. No Aboriginal objects were identified during the inspection and no areas of potential archaeological deposit were identified.



Figure 12 – Vegetation coverage across the site, facing west



Figure 13 Vegetation cover and exposed soils facing south down slope



Figure 14 – Presence of services and footpaths along northern boundary, facing west



Figure 15 Stormwater and drainage along the western boundary of the subject site, facing south



Figure 16 Red-brown clay soils with gravel



Figure 17 Exposed soils within the subject area, facing west

## 2.4. Summary

The archaeological and environmental contexts of the subject area are summarised as follows:

- There are no known Aboriginal objects, or Aboriginal places registered within the subject area.
- An archaeological investigation conducted by Past Traces Heritage Consultants in 2021 oversaw the excavation of a series of test pits. The present subject area was included in the investigation; however, no aboriginal objects were recovered from the present subject area.
- The nearest natural waterway is located 125m east of the subject area. The proximity between the extant first order stream and subject area is considered indicative of likely past Aboriginal land use.
- The visual inspection confirmed that clear and observable ground disturbance has occurred at the subject area as identified by the desktop assessment.

### 3. Due Diligence Assessment

The due diligence process outlined in the Section 8 of the Due Diligence Code and illustrated in **Error! Reference source not found.** above is applied to the subject area below.

#### **Step 1 – Will the activity disturb the ground surface?**

YES

As outlined in Section 1.2 the physical works that will be undertaken as part of the proposed activity include the construction of a series of multistorey buildings, sports courts, an agricultural block, and carpark which will disturb the ground surface.

#### **Step 2a – Are there any relevant confirmed site records on AHIMS or any other sources of information of which a person is aware?**

YES

A 2021 report by Past Traces Archaeology indicates that the area surrounding the present subject area has the potential to retain archaeological remains; however, the present subject area itself is considered unlikely to contain such remains. Test excavation undertaken across the site did not result in the identification of Aboriginal objects.

#### **Step 2b – Are there any landscape features that are likely to indicate the presence of Aboriginal objects?**

YES

The subject area is located within 200 m of natural water which are considered as sensitive landscape features indicative of past Aboriginal land use under the Due Diligence Code (Section 2.2.1). The Due Diligence Code specifies that this step only applies if the proposed activity is on land that is not disturbed (or, implicitly, does not include any relevant landscape features) and does not contain known Aboriginal objects. As there are no known Aboriginal objects or Aboriginal places within the subject area and high level of ground disturbance, Step 3 of the Due Diligence process does not apply for assessment of the present subject area.

#### **Step 3 – Can you avoid harm to the object or disturbance of the landscape feature?**

N/A

#### **Step 4 – Does the Desktop Assessment and Visual Inspection Confirm that there are Aboriginal Objects or that they are Likely?**

N/A

The Due Diligence Code specifies that this step only applies if the proposed activity is on land that is not disturbed (or, implicitly, does not include any relevant landscape features) and does not contain known Aboriginal objects. As there are no known Aboriginal objects or Aboriginal places within subject area, and the area has been subject to a high level of ground disturbance as indicated by the desktop assessment, Step 4 of the Due Diligence process does not apply for assessment of the present subject area.

Nonetheless, a visual inspection was conducted, which further confirmed the assessment that Aboriginal objects are unlikely to be present.

#### **Step 5 – Outcome of Assessment**

In accordance with the due diligence process described in the Due Diligence Code and outlined in **Error! Reference source not found.**, the above assessment has determined that no further investigation is required for the subject area. Urbis recommends that the development proceed with caution, subject to unexpected archaeological finds and human remains procedures being implemented (see Section 4 below).

# 4. Conclusions & Recommendations

The present due diligence assessment concluded that:

1. The proposed activity is not a 'low impact activity' and will disturb the ground surface.
2. There are no known Aboriginal objects or Aboriginal places within subject area.
3. Past reports indicate the area surrounding the present subject area has potential to retain archaeological remains; however, the present subject area itself is considered unlikely to contain such remains.
4. The subject area is located within 200 m of natural water which are considered as sensitive landscape features indicative of past Aboriginal land use.
5. The entire subject area has been subjected to ground disturbance that has changed the land's surface, and which remains clear and observable.
6. In accordance with the due diligence process described in the Due Diligence Code, the above assessment has determined that no further investigation is required for the subject area. Based on the above conclusions, Urbis recommends the following:

- **Recommendation 1 – Record Keeping**

This ADD report should be kept as evidence of the Due Diligence Process having been applied to the subject area.

- **Recommendation 2 – No Further Investigation**

The development may proceed with caution, subject to the following archaeological chance finds and human remains procedures being implemented and followed.

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

Should any archaeological deposits be uncovered during any site works, the following steps must be followed:

1. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must assess the find and its potential extent.
4. If impacts to the identified site extent are required, an Aboriginal Cultural Heritage Assessment Report (ACHAR) and an Aboriginal Heritage Impact Permit (AHIP) application process must be undertaken.
6. Works in the vicinity of the find can only recommence only after an AHIP is granted from Heritage NSW.

This procedure can be included as a mitigation measure under the REF.

- **Recommendation 4 – Human Remains Procedure**

In the unlikely event that human remains are uncovered during the proposed works, the following steps must be followed:

6. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds.
7. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
8. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.

9. Management recommendations are to be formulated by the NSW Police, Heritage NSW and site representatives.
10. Works are not to recommence until the find has been appropriately managed.

This procedure can be included as a mitigation measure under the REF.

## 5. References

- Biosis, 2016, *North Bungendore Planning Proposal Aboriginal Cultural Heritage Due Diligence Assessment*.
- Department of Environment Climate Change and Water ('DECCW') 2010a, *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*
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- Environment Protection and Biodiversity Conservation Act 1999* (Cth)
- Jenkins, B.R. 2000, *Soil Landscapes of the Canberra 1:100 000 Sheet, Department of Land and Water Conservation, Sydney*.
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- OEH 2011b, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*
- OEH 2012, *Guide to completing the AHIMS Site Recording Form*
- Past Traces Heritage Consultants, 2021, *Elm Grove Bungendore - Stage 2A and 2B Residential Subdivision 174 Tarago Road Bungendore – Aboriginal Cultural Heritage Assessment Report*
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# Disclaimer

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# Glossary

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

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

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

# Appendix A AHIMS Search Results