

1 July 2025

Emma Murray
Project Officer, Infrastructure Planning – Major Projects
NSW Department of Education

Our Reference: 24-0021C_v3

Re: Wilton Public and High Schools—Addendum Letter

Dear Emma,

GML Heritage Pty Ltd (GML) has been engaged by School Infrastructure NSW (SINSW)/the NSW Department of Education (DoE) to prepare an addendum letter to accompany the Wilton Public School and High School Preliminary Indigenous Heritage Assessment Impact report (PIHAI) (GML, 2025).

The Wilton Junction Public School (north within the development site) and Wilton Junction High Schools site (south within the development area) combined are referred to as the project area or study area. These land areas form part of a larger landholding current subject to development by Landcom. The wider development area, including the study area, is subject to Aboriginal Heritage Impact Permit (AHIP) 5228 (Figure 1 and Figure 2).

This letter report has been prepared for the purpose of:

- detailing the conditions of AHIP 5228 relevant to the project area, and identify those conditions which have been fulfilled and those which remain outstanding;
- providing guidance on the management of unexpected finds under the AHIP during construction of the public and high school site; and
- discussion of the management of approaches to the no-harm area around scar tree WJ-ST-01 (AHIMS ID 52-2-4081).

Archaeological background

Multiple Aboriginal archaeological assessments have been conducted for the study area, most notably the 2022 North Wilton Bulk Earthworks Aboriginal Cultural Heritage Assessment Report (ACHAR) prepared by Kelleher Nightingale Consulting Pty Ltd (KNC)¹ and the GML PIHAI.² A full assessment of the archaeological context of the project area is provided in the project PIHAI.³

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The following information has been summarised from the PIHAI report, and provided here for context.

The project area covers approximately 7 hectares and is presently undeveloped farmland.

The site contains two registered AHIMS sites (scar tree sites WJ-ST-01, AHIMS ID 52-2-4081; and WJ-ST-02, AHIMS ID 52-2-4082), and one site that has since been marked as 'not a site' on AHIMS (52-2-4863) (Figure 2). Scar tree WJ-ST-02 (52-2-4082) is marked as destroyed and is no longer extant within the northern public school project area (Figure 3).

Scar tree WJ-ST-01 (52-2-4081) is located in the south of the project area, adjacent the western boundary. This item is located inside the future high school boundary (Figure 3). The tree is extant and in good condition and has one cultural scar (Figure 4 to Figure 6). Future management of scar tree WJ-ST-01 is a key outcome for SI NSW during development of the future school site.

AHIP 5228

The project area is subject to AHIP 5228, issued on 2 April 2024 to Landcom and valid for a period of ten years until 2 April 2034. The AHIP covers approximately 157 hectares, comprising the Landcom Panorama residential development site, of which the project area forms part.

Permissible works approved under this AHIP are defined by the ACHAR. AHIP 5228 specifies the proposed works as *residential subdivision and development of 873 hectares of acquired lands known as 'North Wilton'*, involving *bulk earthworks over the southern portion of the North Wilton site*. The project ACHAR should be referred to for further detail. We understand the approved works include topsoil stripping for the purpose of development actions.

The following section details the status of the twenty conditions established by AHIP 5228 (Table 1). Actions subject to SINSW/DoE compliance are outlined in Table 2. Some terminology and wording in the tables below has been abbreviated for ease of presentation of the information:

- AHIMS: Aboriginal Heritage Information Management System
- ASIRF: Aboriginal Site Impact Recording Form
- HNSW: Heritage NSW
- NPW Act: *National Parks and Wildlife Act 1974* (NSW)
- RAP: Registered Aboriginal Party

Table 1 Conditions of AHIP 5288.

AHIP Condition	Condition #	Summary of Condition	Status & responsibility
Persons undertaking actions or works covered by this AHIP	1	The AHIP holder must ensure that all persons involved in actions or works covered by this AHIP (whether employees, contractors, sub-contractors, agents or invitees) are made aware of and comply with the conditions of this AHIP.	Ongoing Landcom, with some responsibility for SINSW.
	2	A suitably qualified and experienced individual must be appointed as a project manager who is responsible for overseeing, for and on behalf of the AHIP holder, all actions relating to this AHIP.	Ongoing Landcom
	3	If an alternative to the nominated project manager is appointed, Heritage NSW must be notified of their contact details within 14 days of this appointment.	Ongoing Landcom
Notification of registered Aboriginal parties (RAPs)	4	A copy of AHIP 5288 must be provided to each RAP within 14 days of receipt of the AHIP and at least 7 days before the start of works under the AHIP.	Completed Landcom A copy of AHIP 5288 was provided to the project RAPs on 12/04/2024
	5	Where AHIP 5288 is varied or transferred, a copy of the AHIP variation or transfer notice must be provided to all RAPs within 14 days of receipt of the notice.	Ongoing Landcom
Indemnity	6	The AHIP holder agrees to indemnify and keep indemnified the Crown in right of NSW, the Minister administering the Act, the Director-General of Heritage NSW, and their employees, agents and contractors in the absence of any wilful misconduct or negligence on their part, from and against all actions, demands, claims, proceedings, losses, damages, costs (including legal costs), charges or expenses suffered or incurred by them resulting from: (a) Any damage or destruction to any real or personal property; and	Ongoing Landcom

AHIP Condition	Condition #	Summary of Condition	Status & responsibility
		(b) Injury suffered or sustained (including death) by any persons arising from or in connection with any actions undertaken pursuant to this AHIP.	
Breach of AHIP conditions	7	<p>The AHIP holder must notify HNSW in writing as soon as practicable after becoming aware of:</p> <ul style="list-style-type: none"> (a) Any contravention of s.86 of the Act not authorised by this AHIP; and/or (b) Any contravention of the conditions of this AHIP. <p>Where Heritage NSW suspects that an incident has occurred which may have breached the NPW Act or AHIP, Heritage NSW and/or Authorised Officer appointed under the NPW Act may request a written incident report, which includes the following:</p> <ul style="list-style-type: none"> (a) the nature of the incident; (b) the actual or likely impact of the incident on Aboriginal objects and/or Aboriginal places; (c) the nature and location of these Aboriginal objects and/or Aboriginal; (d) places, referring to and providing maps and photos where appropriate; (e) any conditions of an AHIP which may have been breached; and (f) the measures which have been taken or will be taken to prevent a recurrence of the incident. <p>The incident report must be provided to HNSW within the timeframe specified in the request.</p>	<p>Ongoing</p> <p>Landcom noting that SINSW will be acting on behalf of Landcom inside their development boundary.</p>
	8	Newly identified Aboriginal objects must be notified online to the Department Secretary under section 89A of the NPW Act using AHIMS.	<p>Ongoing</p> <p>Landcom and SINSW</p>
Human remains	9	All human remains in, on or under the land must not be harmed.	<p>Ongoing</p> <p>Landcom and SINSW</p>

AHIP Condition	Condition #	Summary of Condition	Status & responsibility
	10	<p>If any human remains are discovered and/or harmed in, on or under the land, the AHIP holder must:</p> <ul style="list-style-type: none"> (a) Not further harm these remains; (b) Immediately cease all work at the location; (c) Secure the area to avoid further harm to the remains; (d) Notify the local police and the NSW Environment Line on 131 555 as soon as practicable and provide any available details of the remains and their location; and (e) Not recommence any work at the location unless authorised in writing by HNSW. 	Ongoing Landcom and SINSW
Harm through the proposed works	11	<p>The Aboriginal objects described in Schedule C may be harmed. Nothing in this condition authorised harm to Aboriginal objects described in Schedule A (whether human remains, Aboriginal objects or 'no-harm areas').</p>	Ongoing Landcom and SINSW
Harm report	12	<p>A report must be prepared about the actions relating to the harm of Aboriginal objects (as permitted by this AHIP). The report must:</p> <ul style="list-style-type: none"> (a) Describe any ongoing consultation with or involvement of representatives of the RAPs in relation to this AHIP; (b) Describe how any Aboriginal objects or 'no-harm areas' described in Schedule A were managed during the period covered by the AHIP; (c) Provide details of the Aboriginal objects which were fully or partially harmed while undertaking the actions; (d) If any salvage excavations were authorised by this AHIP, provide a description of the methods and results of the salvage excavation; (e) Detail any community collection of Aboriginal objects undertaken by the RAPs; 	Ongoing/future action SINSW for relevant actions inside their development area.

AHIP Condition	Condition #	Summary of Condition	Status & responsibility
		<p>(f) Common on the effectiveness of any mitigation measures that were implemented;</p> <p>(g) Comment on the effectiveness of any management plan which was in place;</p> <p>(h) If any Aboriginal objects were moved to a temporary storage location, a description of the nature and types of Aboriginal objects which are now at that location;</p> <p>(i) Detail the results of any analysis of Aboriginal objects;</p> <p>(j) Detail the long-term management arrangements for any Aboriginal objects; and</p> <p>(k) Include a statement confirming that all Aboriginal Site Impact Recording Forms have been completed and submitted.</p>	
	13	The report must be submitted to HSNW and AHIMS within 4 months of the completion of the actions.	Future action Landcom, as the AHIP holder
	14	A copy of the report including a summary of the report in plain English must be sent to each RAP within 14 days of the report being submitted to HNSW.	Future action Landcom, as the AHIP holder
Temporary storage	15	Any Aboriginal objects that are removed from the land by actions authorised by this AHIP, must be moved as soon as practicable to the temporary storage location (see table in AHIP).	Ongoing SINSW for relevant actions inside their development area.
	16	HNSW must be notified of an alternative temporary storage location at least 7 days prior to the move.	Ongoing Landcom
	17	Any Aboriginal objects stored at the temporary storage location must not be further harmed, except in accordance with the conditions of this AHIP.	Ongoing Landcom
Long term management	18	If objects are to be transferred under a Care and Control Agreement to an Aboriginal person or organisation representing Aboriginal people in accordance with section 85A(1)(c) of	Ongoing/future action Landcom

AHIP Condition	Condition #	Summary of Condition	Status & responsibility
		the NPW Act an application for a Care and Control Agreement must be completed.	
	19	If reburial is to be undertaken of objects, Requirement 26 'Stone artefact deposition and storage' in the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> must be complied with unless the RAPs agree to an alternative deposition method.	Ongoing/future action Landcom
Aboriginal site impact recording form	20	<p>Aboriginal Site Impact Recording Form must be completed and submitted to the AHIMS Registrar for each AHIMS site identified in Schedule B and C, within 4 months of the completion of the actions authorised by this AHIP.</p> <p>Note:</p> <ul style="list-style-type: none"> The ASIRF must be updated with information about the site in each relevant field. Reference to a report is not an acceptable substitute for site information. <p>A link to the ASIRF and contact details for the AHIMS Registrar are provided in the AHIP.</p>	Ongoing Landcom

Table 2 Conditions of AHIP 5288 which require SINSW/DoE compliance, management and/or action.

AHIP Condition	Responsibility and action required
1	<p>The AHIP holder (Landcom) holds primary responsibility for ensuring compliance with this condition. Landcom must ensure that SINSW/DoE, are in turn, ensuring all their staff and contractors working on the Wilton schools site construction are aware of the AHIP requirements through provision of a heritage induction regarding the conditions of the AHIP and unexpected finds protocol to.</p> <p>Therefore SINSW/DoE must ensure all workers within the Wilton schools site comply with the AHIP. Records of the induction(s) may need to be provided to Landcom to demonstrate compliance with AHIP Condition 1.</p>
7	<p>The AHIP holder (Landcom) holds primary responsibility for ensuring compliance with this condition. Should SINSW/DoE become aware of any contravention of section 86 of the NPW Act not authorised by an AHIP or breach of the conditions of AHIP 5288, the AHIP holder (Landcom) should be notified as soon as practicable upon becoming aware of the contravention or breach. SINSW/DoE should assist the AHIP holder in notifying HNSW via writing of the contravention or breach through provision of details, photographs and maps identifying the extent and nature of the contravention/breach.</p>

AHIP Condition	Responsibility and action required
8	<p>Should any actual or suspected Aboriginal objects be identified during works within the project area, a suitably qualified archaeologist should be engaged to assess the object(s).</p> <p>Should the objects be confirmed to be Aboriginal objects, Heritage NSW should be notified, which can be through registration of the objects to the AHIMS database.</p>
9	<p>SINSW/DoE must ensure that no human remains in, on or within the project area are not harmed. There are no known burial sites within the project area.</p> <p>In the unlikely event that human remains are identified, the steps outlined in AHIP condition 10 must be followed to ensure remains are not harmed.</p>
10	<p>In the unlikely event that human remains are identified during works within the project area, the steps outlined in AHIP condition 10 must be followed to ensure the remains are not harmed. The AHIP holder should be notified immediately.</p> <p>All works must immediately cease at the location of the remains, and the area secured to avoid further harm to the remains.</p> <p>The local police and the NSW Environment Line must be notified via the contact details presented within AHIP Condition 10.</p> <p>Works may not recommence at the location until authorised in writing by HNSW.</p>
11	<p>No impacts are authorised to human remains or within the no-harm areas identified within Schedule A.</p> <p>Of relevance to the project area is the no-harm area around scar tree WJ-ST-01 (52-2-4081) as identified in Schedule A.2 of the AHIP (Figure 7). No actions that could harm any Aboriginal objects (known or unknown) are approved inside this zone. It is an area based exclusion zone, which is identified as containing Aboriginal object 52-2-4081.</p> <p>SINSW/DoE must appropriately manage the no-harm area through establishment of an exclusion zone. This may be achieved through physical measures (ie fencing around the no-harm zone and signage identifying the no-harm zone) and through briefing staff, workers and contractors on the no-harm zone (ie via heritage induction).</p> <p>Details of the management strategies employed should be recorded and provided to the AHIP holder to demonstrate compliance with the AHIP.</p>
12	<p>The AHIP holder (Landcom) holds primary responsibility for ensuring compliance with this condition through preparing a harm report in accordance with Condition 12 subsections (a) to (g). The following subsections are relevant to SINSW/DoE. Suggested actions are provided within the red text:</p> <p>(a) describe any ongoing consultation with or involvement of representatives of the RAPs in relation to this AHIP. The details of consultation with the RAPs undertaken for the project area (eg consultation regarding management of the WJ-ST-01 (AHIMS ID 52-2-4081) no harm area, etc) should be logged and provided to Landcom following the completion of works.</p> <p>(b) describe how any Aboriginal objects or 'no-harm areas' described in Schedule A were managed during the period covered by the AHIP. Details of the actions taken regarding the management of the WJ-ST-01 (AHIMS ID 52-2-4081) no harm area should be recorded and provided to Landcom following the completion of works.</p>

AHIP Condition	Responsibility and action required
	<p>(c) comment on the effectiveness of any mitigation measures that were implemented. Mitigation measures under the AHIP with regards to the project area include maintenance of an exclusion zone around the WJ-ST-01 no-harm area, implementation of an unexpected finds procedure, and may include maintenance on WJ-ST-01 should these activities be proposed to ensure the health and longevity of the tree and cultural scar. All mitigation activities should be documented and provided to Landcom upon the completion of works.</p> <p>(d) comment on the effectiveness of any management plan which was in place. Should SINSW develop a management plan for WJ-ST-01, relevant comment on its effectiveness should be provided to Landcom.</p> <p>(e) detail the results of any analysis of Aboriginal objects. Analysis of scar tree WJ-ST-01 through the arborist report(s) should be provided to Landcom.</p> <p>(f) detail the long-term management arrangement for any Aboriginal objects. Long-term management and maintenance strategies for WJ-ST-01 should be compiled, preferably in the form of a management plan. This should be provided to Landcom.</p> <p>(g) include a statement confirming all Aboriginal ASRIFs have been completed and submitted. Subject to separate advice from Heritage NSW, maintenance works on WJ-ST-01, if proposed, may require submission of an ASRIF to AHIMS. All ASRIFs prepared for the project area should be supplied to Landcom following approval by AHIMS.</p>
15	<p>Any Aboriginal objects identified during works within the project area would be unexpected finds. These can be removed from the land under the actions (bulk earthworks) authorised by the AHIP under Schedule C2.</p> <p>Unexpected finds should be moved to the temporary storage location specified in Condition 15. This would require liaison with and notification of Landcom.</p>

WJ-ST-01 no-harm area—identified administrative issues

Schedule A3 error

The AHIP contains an administrative text error that should be corrected. Landcom should request Heritage NSW revise the text of Schedule A3 thus: site 'WJ-IF-02 (AHIMS ID 52-2-4092)' is to be replaced with 'WJ-ST-01 (AHIMS 52-2-4081)'.

This is explained below:

- Schedule A2 of AHIP 5288 identifies scar tree WJ-ST-01 (AHIMS 52-2-4081) as an Aboriginal object which must not be harmed.
- Attachment 2 of the AHIP identifies three no-harm areas and shows scar tree WJ-ST-01 (52-2-4081) as a no harm area.
- But, the Schedule A3 no-harm areas does not include WJ-ST-01 (52-2-4081).

Instead Schedule A3 identifies an isolated artefact, WJ-IF-02 (AHIMS ID 52-2-4092), as being inside a no-harm area, which is incorrect because Schedule C1 approves harm to this object.

Regardless of the exclusion of WJ-ST-01 from Schedule A3, this scar tree should be treated as a no-harm area in accordance with Attachment 2, and not subjected to harm in accordance with Schedule A2.

AHIP boundary mapping error

There is a contradiction between the spatially mapped boundaries for the no-harm area around 52-2-4081 between the AHIP (Attachment 2) and online data presented in SEED. Landcom should request Heritage NSW present consistent mapping for the 52-2-4081 no-harm area.

This is explained below:

AHIP boundary data retrieved from the NSW Government Central Resource for Sharing and Enabling Environmental Data in NSW (SEED) supplied by Heritage NSW (data revision date 17 April 2025) identifies the no-harm area around 52-2-4081 as a circle with a diameter of 20m centred on the AHIMS point.

The boundary data for AHIP 5288 is listed as 'applicant supplied shp' (shapefile). By comparison, Attachment 2 of the AHIP depicts the no harm area as comprising a square of 20m width and 20m length centred in the AHIMS point for 52-2-4081.

The difference between the two no-harm area shapes is shown in Figure 7.

To avoid unintentional harm, we recommend deferring to the larger square no-harm area as depicted in AHIP 5288 Attachment 2, which entirely encompasses the smaller circular no-harm area as depicted in the NSW Government SEED AHIP data. We note that the current fencing around the scarred tree is not square (fencing as shown in Figure 6).

A square no-harm area measuring 20m north-south by 20m east-west should be established around WJ-ST-01, using the AHIMS coordinates as a centre point, listed in the AHIP Schedule 2 as Easting 286115 Northing 6211991 (GDA 94 MGA 56).

Recommended ACH management actions

On review of conditions on AHIP 5288, the following recommendations are made:

- AHIP conditions and their associated actions which are the responsibility of SI NSW/DOE (Table 2) should be noted and actioned as required.
- The administration errors on the AHIP should be identified to Landcom, as the AHIP holder, and Heritage NSW asked to address the two matters.
- No ground surface disturbance should occur inside the no-harm area under AHIP 5288.
- The no-harm area around 52-2-4081 should be reviewed and revised to a square, as per AHIP 5288 Attachment 2. KNC provided the following guidance regarding management of the three no harm areas under the AHIP within the precinct-wide Wilton bulk earthworks ACHAR (emphasis GML's):

Management measures to be implemented include the demarcation of the sites **WJ-ST-01**, WJ-ST-03 and NW GDG 1 with protective fencing and identification of these areas as environmentally sensitive "no-go zones". The sites will also be identified on any construction environmental managements plans (or similar), and documented toolbox talks will be held to ensure all on-site staff and contractors are aware of obligations and requirements regarding the protection of Aboriginal heritage.⁴

Recommendations for the management and site protection for **WJ-ST-01 (AHIMS 52-2-4081)**, WJ-ST-03 (AHIMS 52-2- 4083) and NW GDG 1 (AHIMS tbc) include:

- The boundaries of Aboriginal sites **WJ-ST-01 (AHIMS 52-2-4081)**, WJ-ST-03 (AHIMS 52-2-4083) and NW GDG 1 (AHIMS tbc) should be demarcated with protective fencing and identified as environmentally sensitive "no-go zones".
- The location of Aboriginal sites **WJ-ST-01 (AHIMS 52-2-4081)**, WJ-ST-03 (AHIMS 52-2-4083) and NW GDG 1 (AHIMS tbc) should be included on construction environmental management plans (or similar) and identified as environmentally sensitive "no-go zones".
- All site workers inducted as to appropriate site protection measures for Aboriginal **WJ-ST-01 (AHIMS 52-2-4081)**, WJ-ST-03 (AHIMS 52-2-4083) and NW GDG 1 (AHIMS tbc).⁵
- The installation of protective fencing around #52-2-4081 should not penetrate the ground. If protective fencing is to be placed on the boundary of the no harm area, a non-penetrative solution is recommended. Signage should be attached to the fencing identifying the heritage no-harm zone.

- Protective fencing must be established and maintained during bulk earthworks and construction, as recommended by the project ACHAR.⁶ The no-harm area remains valid until the expiry of the AHIP. Suitable policies and procedures must be enacted to ensure that there are no impacts to the no-harm area following the conclusion of construction activities.
- A heritage induction should form part of the general site induction for all workers, staff and contractors engaged in the works, in addition to heritage briefings as a component of 'toolbox talks' as recommended by KNC. The heritage induction may form a short PowerPoint presentation or similar, and should contain:
 - an Acknowledgement of Country;
 - an overview of the statutory context and relevant AHIP conditions;
 - an overview of the Aboriginal cultural heritage of the project area, including detail on WJ-ST-01 and no-harm area;
 - examples of local First Nations cultural material (e artefacts);
 - an unexpected finds procedure (UFP) to be followed in the case of identification of unexpected Aboriginal objects; and
 - contact details for key personnel responsible for ensuring heritage compliance.
- The following advice is provided with respect to future WJ-ST-01 tree maintenance, and preparation of an unexpected finds protocol.

WJ-ST-01 tree maintenance and management

Scar tree WJ-ST-01 (52-2-4081) is a living Aboriginal object with statutory protection. It is surrounded by a no-harm zone; any action that could cause harm to any known or unknown Aboriginal objects, including but not limited to ground-disturbing works, inside the no harm zone is not approved under AHIP 5288. The no-harm zone extends 20m north-south by 20m east-west, and is centred on the AHIMS point for 52-2-4081).

Therefore, any future maintenance activities affecting the tree and/or the land area inside the no-harm zone would require further heritage assessment and/or a new AHIP or variation to AHIP 5288. Consultation with Heritage NSW may be required to inform permitted maintenance activities.

Unexpected finds procedure

Harm to Aboriginal objects, excluding those identified in AHIP Schedule A, is permitted by Schedule C2 of the AHIP. Schedule C2 authorises harm to *all Aboriginal objects in, or under the land which is identified on the AHIP application map Attachment 1*. This refers to the boundaries of the AHIP, within which the project area is situated.

The project's PIHAI identified a low level of potential for stone artefacts and culturally modified (scar or ring) trees. Under Schedule C2, bulk earthworks which may harm any previously unidentified Aboriginal objects are permitted.

Aside from scar tree WJ-ST-01 (52-2-4081), which is listed on Schedule A2, no other registered Aboriginal objects are identified within the study area.

Scar tree WJ-ST-02 (52-2-4082) is no longer extant and has been marked as destroyed, and site 52-2-4863 is classified as 'not a site', ie not an Aboriginal object. Neither of these two sites (52-2-4082 and 52-2-4863) requires further management.

Any human remains which may be present within the project area must not be harmed in accordance with Conditions 9 and 10 and Schedule A1.

In the unlikely event that human remains are identified, the management steps outlined in Condition 10 must be complied with.

For all other unexpected Aboriginal heritage finds identified during works, the following unexpected finds protocol (UFP) could be implemented.

Unexpected Finds Protocol

In the instance that an actual or suspected Aboriginal object is identified during works:

- Stop work immediately in the location of the find and ensure no further disturbance occurs.
- Contact the project archaeologist to inspect the item, make a positive identification, and provide advice on how to proceed. AHIP Conditions 8 and 15 apply, and the item would likely be recorded, collected, and given to Landcom for temporary storage.
- Work should not continue in the area until sign-off has been given by the project archaeologist. The project archaeologist *may* need to contact Heritage NSW and/or the Aboriginal community representatives to discuss ongoing management of the unexpected find.
- In the unlikely event that human remains are discovered at any time during the works, works must cease immediately in the surrounding area and the area secured to avoid further harm in compliance with AHIP 5288 Conditions 9 and 10. The findings must be immediately reported to the local police and the NSW Environment Line on 131 555. Works cannot resume at the location unless authorised in writing by Heritage NSW.

Mitigation measures

The following table summarises the proposed mitigation measures for the project:

Table 3 Proposed Aboriginal heritage mitigation measures.

Aspect	Mitigation Measure ID	Mitigation measure name	Mitigation measure	Timing
Heritage	HMM2a	Aboriginal heritage unexpected finds	<p>If any unexpected Aboriginal objects or sites (or potential Aboriginal objects or sites) are identified during any construction work, all works in the vicinity must cease and the area must be appropriately protected. The DoE Heritage Team is to be notified, and an archaeologist engaged to undertake a site inspection to assess the find in consultation with the Registered Aboriginal Parties (RAPs). Following the on-site assessment, the archaeologist and RAPs (if they attended the site) are to advise on management of the find as authorised under AHIP 5228 (while this remains valid). Advice should be provided in consultation with the DoE Heritage Team. Should Aboriginal objects be confirmed, these are to be registered in the Aboriginal Heritage Information Management System (AHIMS). AHIP Conditions 8 and 15 apply, and the object(s) would likely be recorded, collected, and given to Landcom for temporary storage.</p> <p>In the unlikely instance that human remains are discovered at any time during the works, works must cease immediately in the surrounding area and the area secured to avoid further harm in compliance with AHIP 5288 Conditions 9 and 10.</p>	Construction
Heritage	HMM4	Compliance with AHIP 5288	The activity must be undertaken in accordance with the conditions of AHIP 5228 as guided by the addendum memo prepared by GML (2025).	Construction
Heritage	HMM5	Heritage induction	A heritage induction must be provided to site workers to ensure that all workers are aware of the conditions of AHIP 5228.	Prior to the commencement of any construction

Aspect	Mitigation Measure ID	Mitigation measure name	Mitigation measure	Timing
			A record of the completion of Aboriginal heritage site induction must be kept and provided to Landcom as the AHIP holder at the completion of works or as requested.	(Stage 1 and Stage 2)
Heritage	HMM5	Exclusion zone	An exclusion zone must be established arounds AHIMS ID 52-2-4081 consistent with the no harm area outlined in AHIP 5228. The exclusion zone must be delineated by fencing during construction.	Prior to the commencement of any construction (Stage 1 and Stage 2)

Summary

We trust that this document adequately addresses SINSW/DoE's responsibilities under AHIP 5288 regarding the Wilton Public and High School site.

Yours sincerely,



Andie Coulson

Heritage Consultant

GML Heritage Pty Ltd

Figures

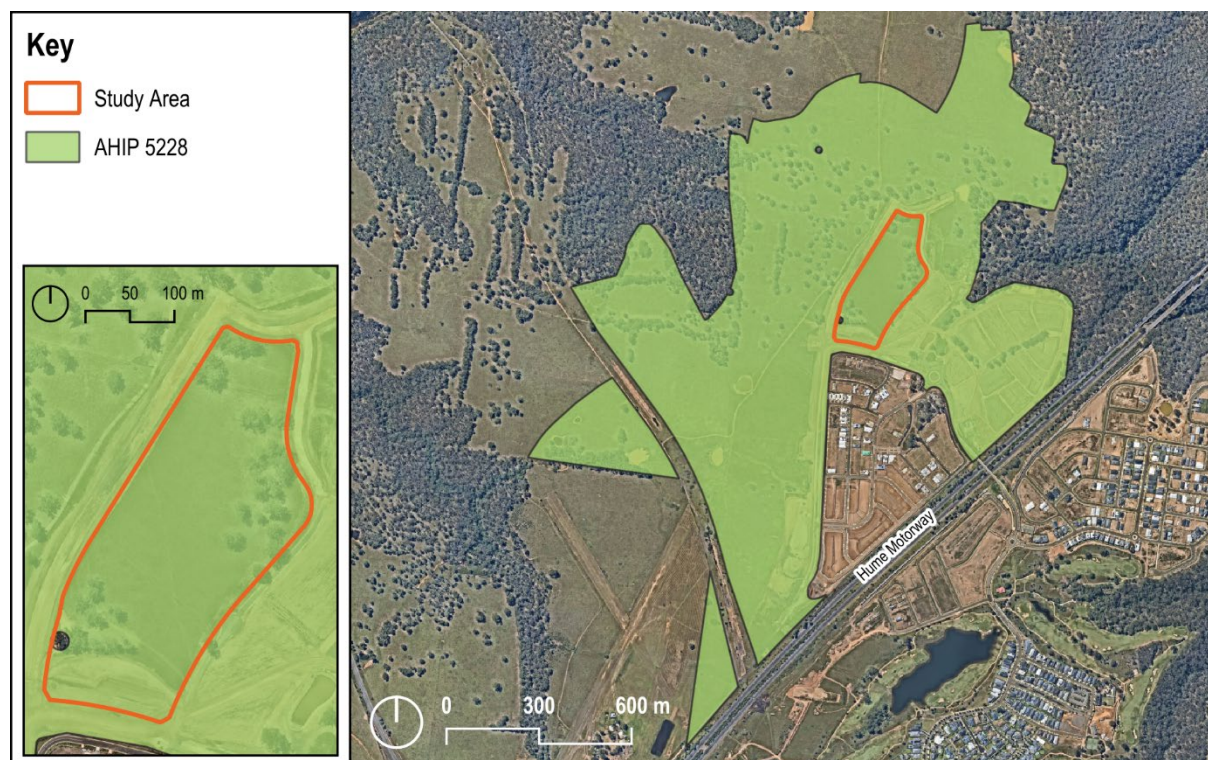


Figure 1 Area covered by AHIP 5288, with the larger project area. (Source: NSW Government Department of Climate Change, Energy, the Environment and Water and Nearmap with GML overlay, 2025)



Figure 2 Location of registered AHIMS sites within the AHIP area. Note that AHIP 5288 does not cover the location of scar tree WJ-ST-01 (AHIMS ID 52-2-4081), which is surrounded by a no-harm zone. (Source: NSW Government Department of Climate Change, Energy, the Environment and Water, NSW Government AHIMS and Nearmap with GML overlay, 2025)



Figure 3 The study area, showing the division (orange dashed line) between the proposed primary school in the northern portion of the study area and the proposed high school in the south of the study area. AHIMS site 52-2-4082 is situated immediately north of the boundary of the two schools, within the proposed primary school, while AHIMS sites 52-2-4081 and 52-2-4863 are located within the proposed high school. (Source: NSW Government AHIMS and Nearmap with GML overlay, 2025)



IMG_166
Figure 2: Close up of NW facing scar

Figure 4 Scar tree WJ-ST-01 (52-2-4081). Photo likely dates from original recording in 2013. Photo extracted from AHIMS site card. (Source: Heritage NSW AHIMS)



Figure 5 Scar tree WJ-ST-01 (52-2-4081). Photo taken in 2024 by GML during site inspection for the PIHAI. (Source: GML, 2024)



Figure 6 Scar tree WJ-ST-01 (52-2-4081), surrounded by temporary protective fencing during a 2024 site inspection. (Source: GML, 2024)

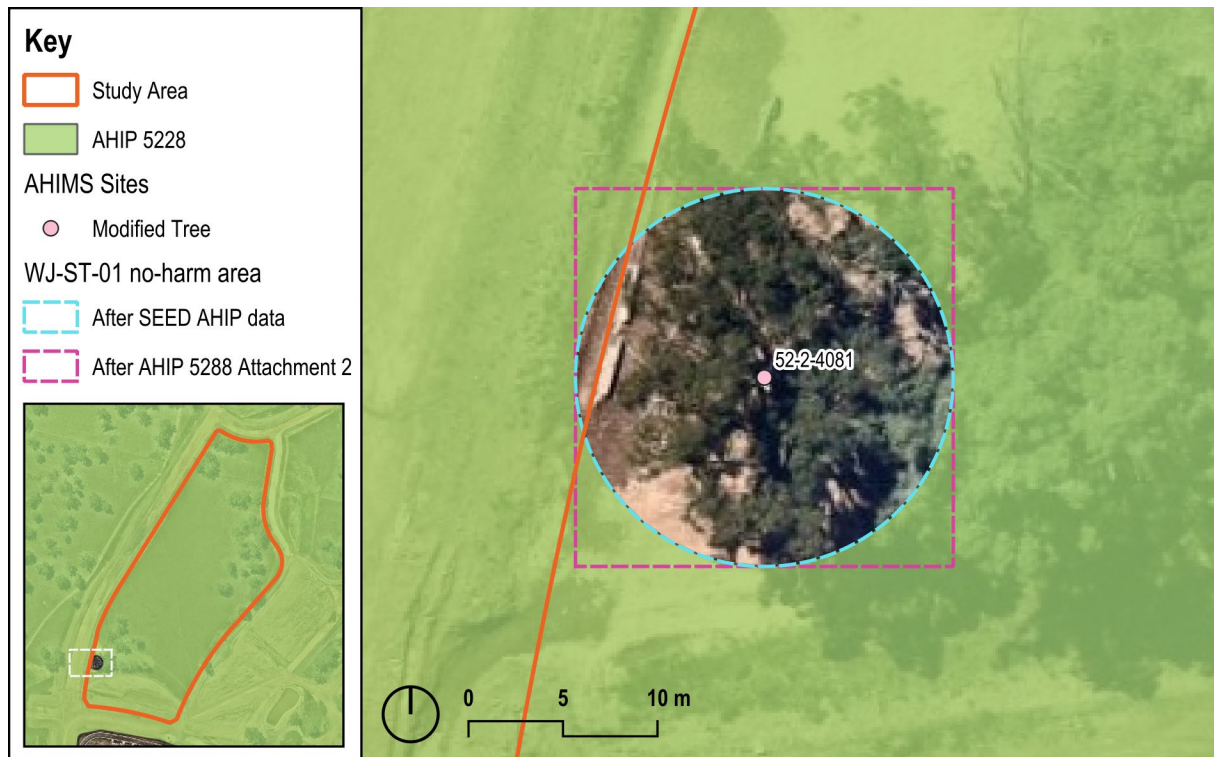


Figure 7 WJ-ST-01 (AHIMS ID 52-2-4081) no harm area showing difference in no-harm area boundary between Attachment 2 of AHIP 5288 (pink square) and the public AHIP boundary data via the NSW Government SEED website (blue circle). (Source: NSW Government Department of Climate Change, Energy, the Environment and Water, NSW Government AHIMS and Nearmap with GML overlay, 2025)

Endnotes

- ¹ Kelleher Nightingale Consulting Pty Ltd, Bulk Earthworks – North Wilton NSW Aboriginal Cultural Heritage Assessment, report prepared for Landcom, November 2022.
- ² GML Heritage, Wilton Public School and High School Preliminary Indigenous Heritage Assessment and Impact (PIHAI), report prepared for School Infrastructure NSW, NSW Department of Education, February 2025.
- ³ GML Heritage, Wilton Public School and High School Preliminary Indigenous Heritage Assessment and Impact (PIHAI), report prepared for School Infrastructure NSW, NSW Department of Education, February 2025.
- ⁴ Kelleher Nightingale Consulting Pty Ltd, Bulk Earthworks – North Wilton NSW Aboriginal Cultural Heritage Assessment, report prepared for Landcom, November 2022, p 52.
- ⁵ Kelleher Nightingale Consulting Pty Ltd, Bulk Earthworks – North Wilton NSW Aboriginal Cultural Heritage Assessment, report prepared for Landcom, November 2022, p 54.
- ⁶ Kelleher Nightingale Consulting Pty Ltd, Bulk Earthworks – North Wilton NSW Aboriginal Cultural Heritage Assessment, report prepared for Landcom, November 2022, p 54.