



artefact

6th November 2025

Athlene Kyle
General Manager Development
Logispace
Level 22, 180 George Street
Sydney NSW 2000

Dear Athlene,

Re: Aboriginal Heritage Due Diligence Report – 191 Miller Road, Chester Hill

Artefact Heritage and Environment Pty Ltd (Artefact) have been engaged by Logispace to prepare an Aboriginal Heritage Due Diligence Report for 191 Miller Road, Chester Hill.

This report outlines the results of an Aboriginal Heritage Due Diligence which meets the requirements of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water [DECCW] 2010a), hereafter the Due Diligence Code of Practice, and includes recommendations as to whether further archaeological investigation may be required.

This report has been prepared by Ginger-Rose Harrington (Heritage Consultant, Artefact Heritage) with management input and review provided by Ryan Taddeucci (Principal and Team Leader, Artefact Heritage) and Sandra Wallace (Managing Director, Artefact Heritage).

If you have any queries regarding this Aboriginal Heritage Due Diligence, please do not hesitate to contact me.

Yours Sincerely,

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1.0 INTRODUCTION

1.1 Project information

Artefact Heritage has been engaged by Logispace (the Proponent) to prepare an Aboriginal Heritage Due Diligence Report (ADD) for the works proposed at 191 Miller Road, Chester Hill in NSW (the study area). The location and boundary of the study area is shown in Figure 1.

The Proponent intends to undertake future redevelopment of the study area via a Development Application (DA) to Canterbury-Bankstown Council, including the construction of two warehouses with surrounding hardstand areas and some landscaping. Prior to undertaking these works, the Proponent is seeking approval for early works and remediation at the site, involving demolition of existing structures, removal of site vegetation, remediation of the site, associated site preparation and flood management work, which will also be subject to a future DA. This ADD has been prepared in view of both future DAs, providing an assessment of the overarching impacts of the development on any potential Aboriginal objects retained within the study area.

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.

1.2 The study area

The study area is located at 191 Miller Road, Chester Hill in NSW, legally described as Lot 82/DP 1282378 (Figure 1). It is located within the Canterbury-Bankstown Local Government Area (LGA) and within the administrative catchment of the Gandangara Local Aboriginal Land Council (LALC). Altogether, the study area is an irregularly shaped lot which measures 64,684m² in area, bounded to the west by Miller Road, to the north by the Chester Hill rail corridor, and to the southeast by industrial developments. Overall land uses surrounding the Site includes:

- **North:** To the north of the subject site is the Main Southern railway line, which is an essential train freight connection.
- **South:** Directly adjoining the Site to the south is a recently constructed warehousing facility at No. 149 Orchard Road, with existing industrial land uses located beyond.
- **East:** To the east of the site is the Orchard Industrial Estate, which fronts Orchard Road and includes various retailers and industrial units.
- **West:** The western boundary of the Site adjoins Miller Road. On the opposite side of Miller Road is a recently constructed warehousing facility for transport and distribution at 1 Monier Square.

Currently, the study area is zoned E4 - General Industrial and is occupied by standalone warehouses, associated infrastructure, open-air carparking and road surfaces. Green spaces are present along the site's western boundary, where some mature vegetation is evident, and within the central portion of the site, where turfing and some shrubbery is evident. The Site is currently declared as Significantly Contaminated by the NSW EPA under the *Contaminated Land Management Act 1997*. The basis of contamination relates to soil vapour and groundwater below the site. The sources of contamination are identified by the EPA as former solvent drum storage, former wash down bays and a tank "the dome tank".

1.3 The proposal

The proponent is seeking approval via a DA to Canterbury-Bankstown Council for the early remediation works including earthworks and flood management works (henceforth, 'DA1'). Overall, the DAs include the following works.

DA 1: Remediation and early works (including earthworks and flooding management works). The works in this stage, include, but are not limited to:

- Site establishment
- Demolition of existing structures
- Remediation of the site in accordance with Remediation Action Plan
- Site preparation and earthworks
- Flood management/mitigation works
- Tree and vegetation removal

DA 2: Construction and operation of warehousing on the site, with associated works. The works in this stage, include, but are not limited to:

- Construction of 2 warehouse buildings comprising of 6 tenancies including ancillary offices, loading docks and hardstand areas.
- 24 hour operation, 7 days a week.
- Other associated works including landscaping, car parking and general site improvements.
- Amendment of the crossover for light and heavy vehicle access is proposed from Miller Road.
- Business identification signage and wayfinding signage.

1.4 Statutory framework

The *National Parks & Wildlife Act 1974* (the NPW Act) provides statutory protection for all 'Aboriginal objects' and 'Aboriginal Places' in NSW whereby it is an offence to damage, deface or destroy Aboriginal objects or places. The NPW Act defines an Aboriginal 'object' as:

any deposit, object or material evidence (not being a handicraft for sale) relating to indigenous and non-European habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons of non-Aboriginal European extraction, and includes Aboriginal remains.

An 'Aboriginal place' is a place gazetted by the Minister, under the Section 84 of the NPW Act:

The Minister may, by order published in the Gazette, declare any place specified or described in the order, being a place that, in the opinion of the Minister, is or was of special significance with respect to Aboriginal culture, to be an Aboriginal place for the purposes of this Act.

Section 87(1) of the NPW Act provides that it is a defence to these provisions if the harm is authorised by an Aboriginal Heritage Impact Permit (AHIP). Section 87(2) of the NPW Act provides that:

It is a defence to a prosecution for an offence under section 86 (2) if the defendant shows that the defendant exercised due diligence to determine whether the act or omission constituting the alleged offence would harm an Aboriginal object and reasonably determined that no Aboriginal object would be harmed.

Undertaking Due Diligence does not constitute consent to harm Aboriginal objects, nor are they a 'site clearance' mechanism to allow activities to occur in an area where Aboriginal objects are likely or known to be present. Consultation with the Aboriginal community is not a formal requirement of the Due Diligence process, however, consideration of undertaking some form of consultation should occur, particularly if it will assist in informing any decision-making. If an AHIP will be required, consultation must be undertaken in accordance with the requirements of Section 60 of the *National Parks and Wildlife Regulation 2019*, as described in the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010b).

Figure 1: Study area



1.5 Step 1: The Due Diligence process

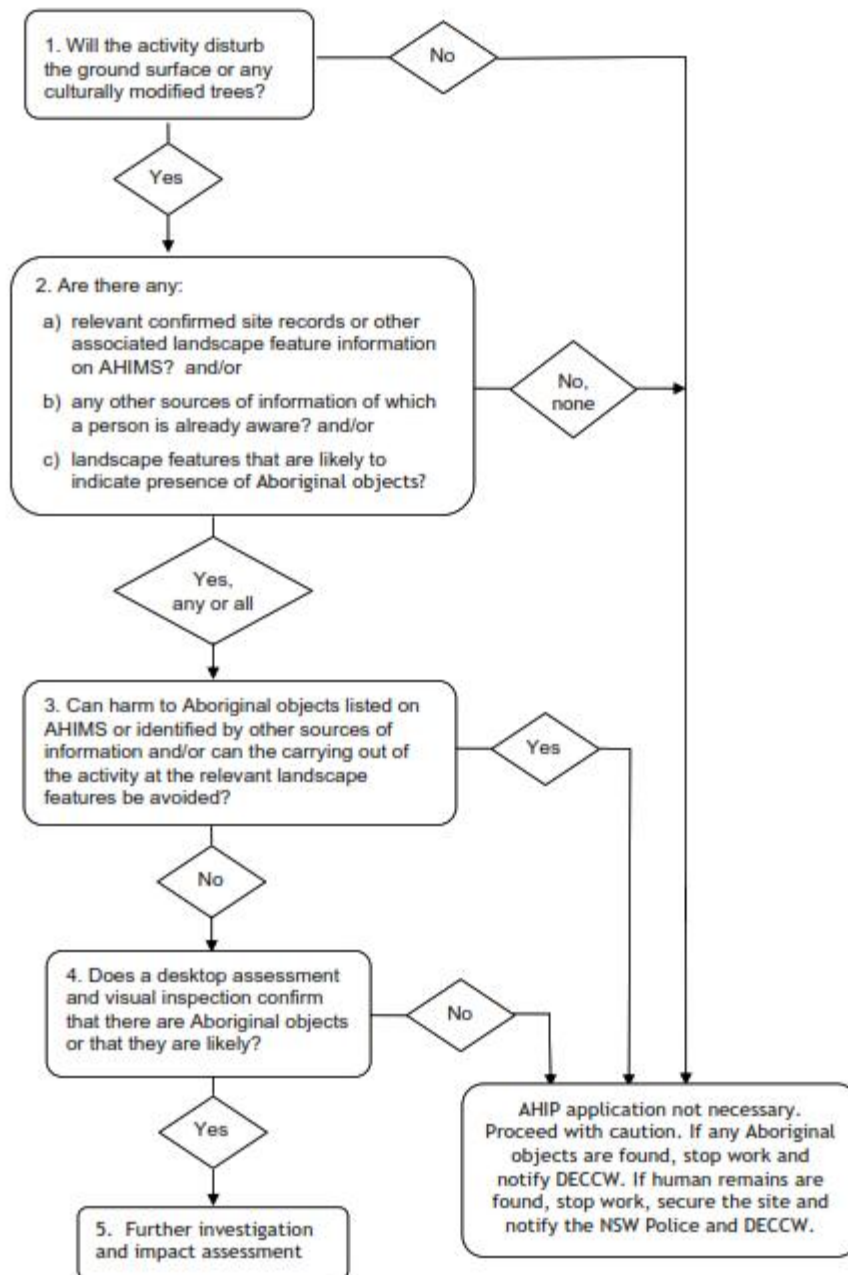
The completion of Due Diligence should only occur in situations where it is appropriate and applicable to do so by following the flowchart on Page 1 of the Due Diligence Code of Practice. It has been determined that it is appropriate to undertake a Due Diligence for these proposed works, as shown in Table 1.

The Due Diligence Code of Practice provides a series of questions that must be answered to determine the outcome of the due diligence process, as shown in the flowchart on page 14 of the Due Diligence Code of Practice (Figure 2). Step 1 of this process is to determine if the proposed works will likely result in disturbance to the ground surface and vegetation clearance. As outlined in Section 1.3, the proposal will cause ground impacts and the clearance of some vegetation. Therefore, Step 2a must be completed.

Table 1: Determination of the suitability of employing a Due Diligence process for this activity

Question		Answer
1.	Is the activity considered a Major Project under Part 4, Division 4.7 or Part 5, Division 5.2 of the EP&A Act?	No
2.	Is the activity exempt from the National Parks and Wildlife Act 1974 or Regulation 2019?	No
3.	Will the activity involve harm that is trivial or negligible	No
4.	Is the activity in an Aboriginal Place or there are known Aboriginal objects in the project area	No
5.	Is the activity a low impact activity in accordance with the National Parks and Wildlife Regulation 2019?	No
6.	Do you want to follow an industry specific Code of Practice	No
7.	Follow the Due Diligence Code of Practice	Yes

Figure 2: Generic Due Diligence Process



2.0 DESKTOP ASSESSMENT

2.1 Step 2a: Aboriginal Heritage Information Management System (AHIMS) search

NOTE: The location of Aboriginal sites is considered culturally sensitive information. It is advised that this information, including the AHIMS data appearing on the heritage map for the proposal be removed from this report if it is to enter the public domain.

A search of the Aboriginal Heritage Information Management System (AHIMS) database (Basic Search CSID #1047403, Extensive Search CSID #1048951) was completed on 23 September 2025 for a search area measuring approximately 4 km x 4 km centred on the study area (Figure 3). The parameters of this search were:

GDA 1994 MGA 56 312570.66 - 316570.66 m E
6246872.42 - 6250872.42 m N

A total of 15 registered Aboriginal sites were identified within the AHIMS Extensive Search Area (Figure 3). There were no registered Aboriginal sites within the study area, or within its vicinity. The closest AHIMS site identified in the search is located approximately 2.2 km southwest of the study area (Figure 3). Given its distance from the study area, it is unlikely for the curtilage of this site to encroach upon the impact footprint of the proposal.

The AHIMS database records sites using a list of twenty standard site features (OEH, 2012). In the Extensive Search Area, a total of two Site Features: 'Artefacts' and 'Artefacts and Potential Archaeological Deposit (PAD)' (Table 2). The dominant confirmed Aboriginal object in the Extensive Search Area (i.e. not a PAD) is Artefacts, which are present at all previously registered Aboriginal sites in the AHIMS extensive search area. These sites are principally associated with Prospect Creek and Duck River.

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.

Table 2: Frequency of site features in AHIMS search results

Site Features	Frequency	Percentage
Artefacts	13	87
Artefacts and PAD	2	13
Total	15	100.00%

2.2 Step 2b: Existing archaeological works

The present assessment identified no previous archaeological investigations of the study area. However, numerous studies have been undertaken within its vicinity which provide insight into the archaeological landscape within which the study area is located.

Artefact Heritage, 2022. *Aboriginal Heritage Due Diligence Assessment – 149 Orchard Road Chester Hill*

In 2022, Artefact Heritage was engaged by Archile Projects to prepare an Aboriginal Heritage Due Diligence Report for 149 Orchard Road, Chester Hill. Although no subsurface investigations were undertaken as part of the assessment, the site is located immediately south and southwest of the study area and is, therefore, relevant to the present ADD

The report assesses the unnamed and partly channelised minor drainage line that flows east from Prospect Creek (within 200m of the study area). Classifying this tributary as a “first order canalised watercourse”, the report notes how lower-order streams are generally less likely to be associated with archaeological deposits compared to higher-order streams. As a result, the report does not regard the site’s proximity to water as indicative of likely past Aboriginal land use. This watercourse is also located within 200m of the study area and should, therefore, be similarly assessed in the present report.

Coast History & Heritage Pty Ltd, 2019. *220, 226 & 246 Miller Road and 1 & 3 Monier Square Villawood Aboriginal Heritage Planning Advice for Prospective Purchase*

In 2019, Coast History & Heritage Pty Ltd (Coast) was engaged by Logos Property to prepare an overview of Aboriginal archaeological constraints for 220, 226 & 246 Miller Road and 1 & 3 Monier Square at Villawood. Although the report provides only a high-level assessment of Aboriginal archaeological potential, the site is located 18m west of the study area and has, therefore, been identified as relevant to the present ADD.

The report emphasises the way Aboriginal objects are likely to be restricted to the original A1 topsoil horizon (and A2 horizon by downward movement), which, based on excavations in similar contexts elsewhere throughout Sydney, is likely to be less than 500mm thick. As Blacktown soils are vulnerable to erosion, which itself impacts the retention of archaeological deposits, historical impacts including land clearance, construction and demolition are likely to have significantly disturbed, if not removed, Aboriginal objects within the site. Given the comparable subsurface conditions and occupation history of the study area to this neighbouring property, similar conclusions may be made with regard to the archaeological potential of 191 Miller Road.

Mary Dallas Consulting Archaeologists (Casey) 2014. *Parramatta Aboriginal Cultural Heritage Study Review Report to Parramatta City Council*.

Casey surveys the recording and management of Aboriginal archaeological sites in the Parramatta City LGA. The report contains no details on specific sites but does make the important observation that a number of sites and nearly 1,000 stone artefacts in addition to shell and bone fragments had been collected from along the Duck River and deposited at the Australian Museum by an amateur collector. The location of these finds has not been accessioned on the AHIMS. The majority of these artefacts are understood to have been collected from Wategora Reserve at the Duck River, approximately 2.7km northeast of the study area. Although this is only a very general and poorly defined indication of archaeological potential, it does nevertheless provide some guide to archaeological potential associated with the Duck River.

White, B. and J. McDonald (2010), “Lithic Artefact Distribution in the Rouse Hill Development Area, Cumberland Plain, New South Wales”, in *Australian Archaeology* (70), pp. 29-38.

The report on lithic artefact distribution in the Rouse Hill Development Area (RHDA) combines data on artefact distribution and density to identify patterns that may reflect Aboriginal preferences for artefact discard within the landscape. It is considered relevant to the present assessment for its insight into the association between Aboriginal objects and lower-order waterways (such as the example within 200m of the study area).

Overall, the report considers the entire RHDA can be considered a cultural landscape, with various lithic activities occurring across it. Certain locations were favoured for artefact discard, resulting in low to moderate density scatters and occasional high-density concentrations. High artefact densities are primarily found on terraces and lower slopes near 4th and 2nd order streams, particularly within 50–100 metres of 4th order streams. By contrast, 1st order landscapes generally have low artefact densities, with many test squares yielding zero artefacts and few containing more than ten artefacts. These patterns suggest large-scale and long-term use of the landscape, which cannot be fully explained by short-term settlement models such as 'residential base' or 'transitory camp'. Applying these conclusions to the study area, it is unlikely for artefacts to be associated with the unnamed and partly channelised minor drainage line located within 200m of the site.

2.3 Step 2c: Landscape features that indicate the presence of Aboriginal objects

Aboriginal objects are often associated with particular landscape features as a result of Aboriginal people's use of those features in their everyday lives and for traditional cultural activities. Therefore, it is likely that Aboriginal objects will be present on land that is:

- Within 200m of water, or
- Located within a sand dune system, or
- Located on a ridge top, ridge line, or headland, or
- Located within 200m below or above a cliff face, or
- Within 20m of or in a cave, rock shelter, or cave mouth

and is on land that has not been subject to human activity that has changed the lands surface, in a clear and observable manner.

The study area is located within an open depression, situated approximately 2.4km northeast of Prospect Creek and 1.7km southwest of Duck River (Figure 4). It is also located within 200m of the northern side of an unnamed and partly channelised minor drainage line that flows east from Prospect Creek (Figure 4). Such lower-order streams are generally less likely to be associated with archaeological deposits compared to higher-order streams and is therefore not necessarily indicative of likely past Aboriginal land use (White & McDonald 2010). Nevertheless, the study area's proximity to a prior waterway (<200m) is considered a sensitive landscape feature under the Due Diligence Code.

The NSW Soil and Land Information System (SALIS) provides information on expected soil landscapes within NSW, locating the study area entirely within the Blacktown Soil Landscape (Figure 5). Blacktown soils are shallow to moderately deep hard-setting mottled texture contrast soils. Red and Brown Podzolic Soils are present on crests which grades to Yellow Podzolic Soils on lower slopes and in drainage lines (Environment NSW, n.d.-b). Excavations undertaken in Blacktown soils indicate that deposits which may contain cultural material are typically shallow (>300mm). Across the Cumberland Lowlands, the underlying shale geology has likely resulted lower frequencies of site features such as grinding grooves, engravings and pigmented or charcoal art-such sites are situated where sandstone geology is present. Blacktown soils are now characterized by almost completely cleared open-forest and open-woodland. Prior to clearance, the original woodland and open-forest were dominated by *Eucalyptus tereticornis* (forest red gum), *Eucalyptus crebra* (narrow-leaved ironbark), *Eucalyptus moluccana* (grey box) and *Eucalyptus maculata* (spotted gum), which, in coastal New South Wales, are all species known to have been subject to cultural modification (Environment NSW, n.d.-a).

Overall, the study area is located within 200m of water, which, under the Due Diligence Code, is considered a landscape feature likely to contain Aboriginal objects. However, based on past archaeological investigations of similar watercourses, the study area is not assessed as demonstrating archaeological potential based on its proximity to a first order canalised watercourse. The Due Diligence Code further specifies that the landscape features are of relevance only if the study area has not been subjected to ground disturbance. 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. Consideration of the site's historical land use is therefore necessary to confirm whether the site's proximity to water (<200m) is indicative of Aboriginal archaeological potential.

Documentary sources indicate the development of the study area from as early as 1942, when it operated as the Villawood Explosives Factory. During this occupational phase, the following infrastructure was constructed throughout the site: coal and sulphur dumps, oleum plant; sulphuric acid tank farm, coal fed gas producer plant, cooling tower and compressor house, contact acid plant and acid regeneration plant. Additional developments at this stage included an administration office, laboratories, tea house and amenity building (JBS Environmental 2025: 12). From 1946, the study area was leased by Australian Fertilisers Limited (AFL), from which time operations at the plant changed from nitrogen-based processes to sulphur-based processes due to an increased demand for more concentrated acids with product storage in an above ground storage tank farm in the northern portion of the site (Figure 6). AFL assumed ownership of the site in 1955, whereafter the gas producer plant was removed (Figure 7-Figure 10). In 1967, the site was partially occupied by the George Shirley Company, during which time Shirley Fertilisers Pty Ltd was established and maintained operations at the site, involving the removal of several buildings (Figure 7-Figure 8). Thereafter, in 1996, the study area was developed with a site office building and warehouse in the western and central northern portion of the site respectively. The warehouse was used to store packaged liquid chemicals and compounds, contributing to both the disturbance and contamination of the site (Figure 10). Finally, CMA Corporation Pty Ltd took physical possession of the site in 2005, operating a scrap metal transfer facility, involving the acceptance of scrap metal, separation of certain components from the scrap (e.g., engines), stockpiling of scrap according to material type, and loading of scrap onto haulage vehicles for off-site disposal (JBS Environmental 2025: 12). Altogether, the documentary sources and available aerial imagery of the study area documents considerable ground disturbances over time which have impacted the entire surface area of the study area.

Previous geotechnical investigations of the study area confirm the depth and extent of disturbance throughout the study area, identifying contaminated fill material consisting of gravely sands with some mixed clays, bricks, slag and sulfur to depths of approximately 0.3m – 1.8m below ground level (bgl) (PSM Consult Pty Ltd 2025). The fill is underlain by weathered siltstone and sandstone at depths ranging between 1m – 6m bgl in the northeast of the site and to greater than 6m bgl in the southwest of the site (PSM Consult Pty Ltd 2025; JBS Environmental 2025). Given this average depth of disturbance, it is likely that previous ground disturbances have entirely removed the shallow A-horizon deposits of Blacktown Soils throughout the site (Environment NSW, n.d.-b), considerably reducing the archaeological potential of the study area. Further modifications to the ground surface, which are confirmed by geotechnical analysis, included the importation of fill to create artificial embankments ranging in height from 1m – 3m along the site's northern boundary (JBS Environmental 2025). The visual inspection of the study area confirmed this high level of overall disturbance, concluding that historic developments including the construction of buildings, hardstand areas, stockpiles and bulk earthworks have modified the surface of the land in a way that remains clear and observable to the present day (Section 3.0). Therefore, under the Due Diligence Code, the site's proximity to water (<200m) is not considered indicative of Aboriginal archaeological potential.

Landscape Feature	Presence in study area
Within 200m of water	Y The study area is located within 200m of a channelised first order tributary of Prospect Creek.
Located within a sand dune system	N The study area is located within Blacktown Soils which are not associated with dune deposits.
Located on a ridge top, ridge line, or headland	N The study area is located within an open depression, which is not a sensitive landscape feature under the Due Diligence Code.
Located within 200m below of a cliff face	N The study area is located within Blacktown Soils which, due to the underlying shale geology, is not typically associated with rock shelters or other sites features which require surface expressions of sandstone.
Within 20m of or in a cave, rock shelter, or cave mouth (Environment 2010)	
Is on disturbed land – 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.	Y The entire study area has been subject to the construction and demolition of buildings and bulk earthworks, which constitutes disturbance as defined by the Due Diligence Code and is likely to have significantly disturbed or removed archaeological deposits.

2.4 Step 3: Can you avoid harm to the object or disturbance of the landscape feature

A review of the AHIMS register identified no AHIMS sites previously been identified within the study area or its vicinity. This was confirmed by a review of previous archaeological investigations undertaken in the vicinity of the site, which identified no Aboriginal objects previously identified which may encroach upon the curtilage of the study area. A review of the environmental context of the study area identified its proximity to water (<200m) an indicative landscape feature for past Aboriginal land use; however, the entire study area has been subject to high levels of disturbance due to the construction and demolition of buildings and bulk earthworks, whereby this landscape feature is not considered indicative of Aboriginal archaeological potential under the Due Diligence Code. It is therefore reasonable to conclude that Aboriginal objects are unlikely to occur within the study area and that the proposal is unlikely to harm Aboriginal Objects. Nevertheless, a visual inspection should be completed to test the assumptions of the desktop findings and verify the presence or absence of Aboriginal objects identifiable on the ground surface (Step 4).

Figure 3: Distribution of AHIMS sites within the Extensive Search Area

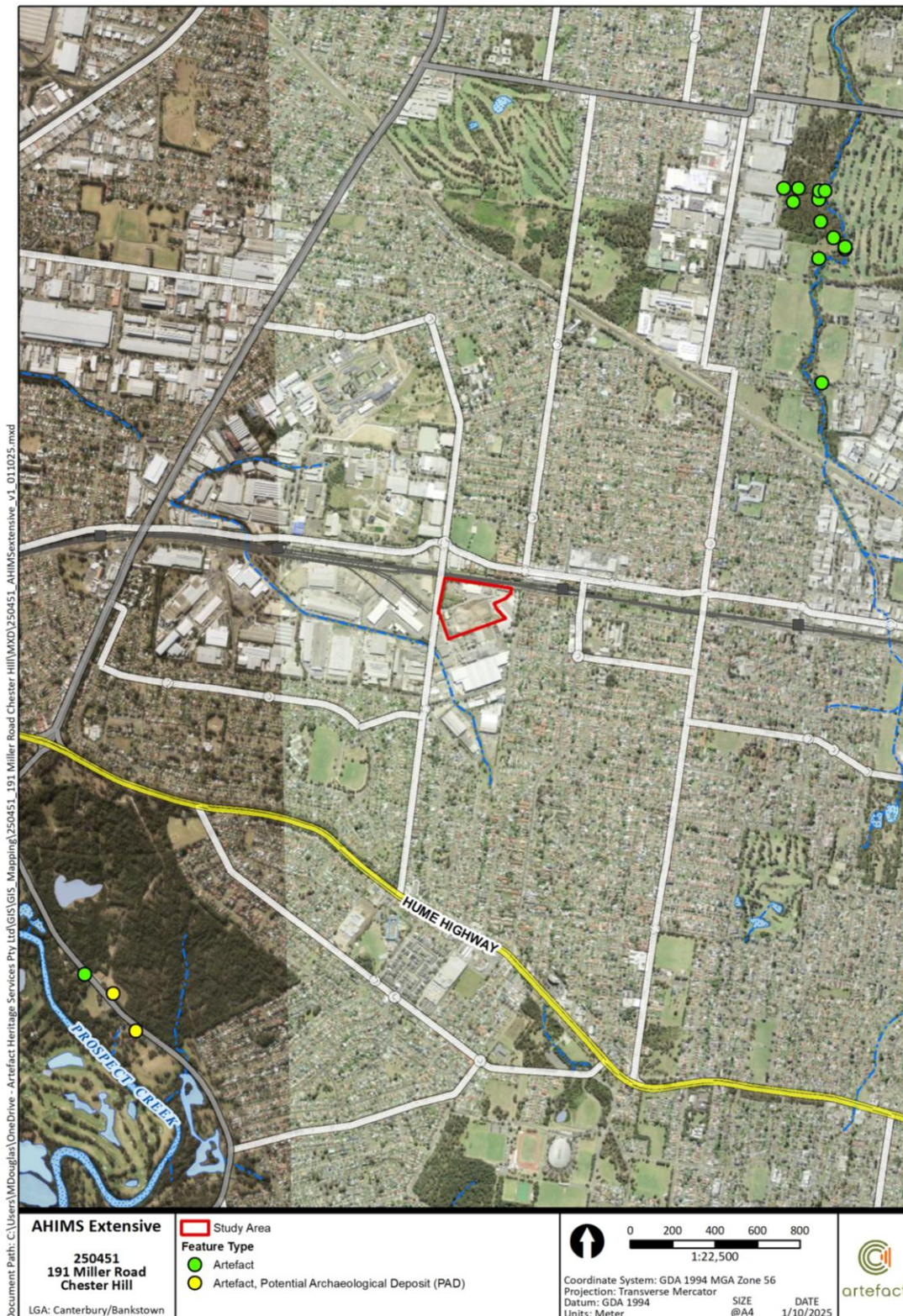


Figure 4: Topographic and hydrographic context of the study area

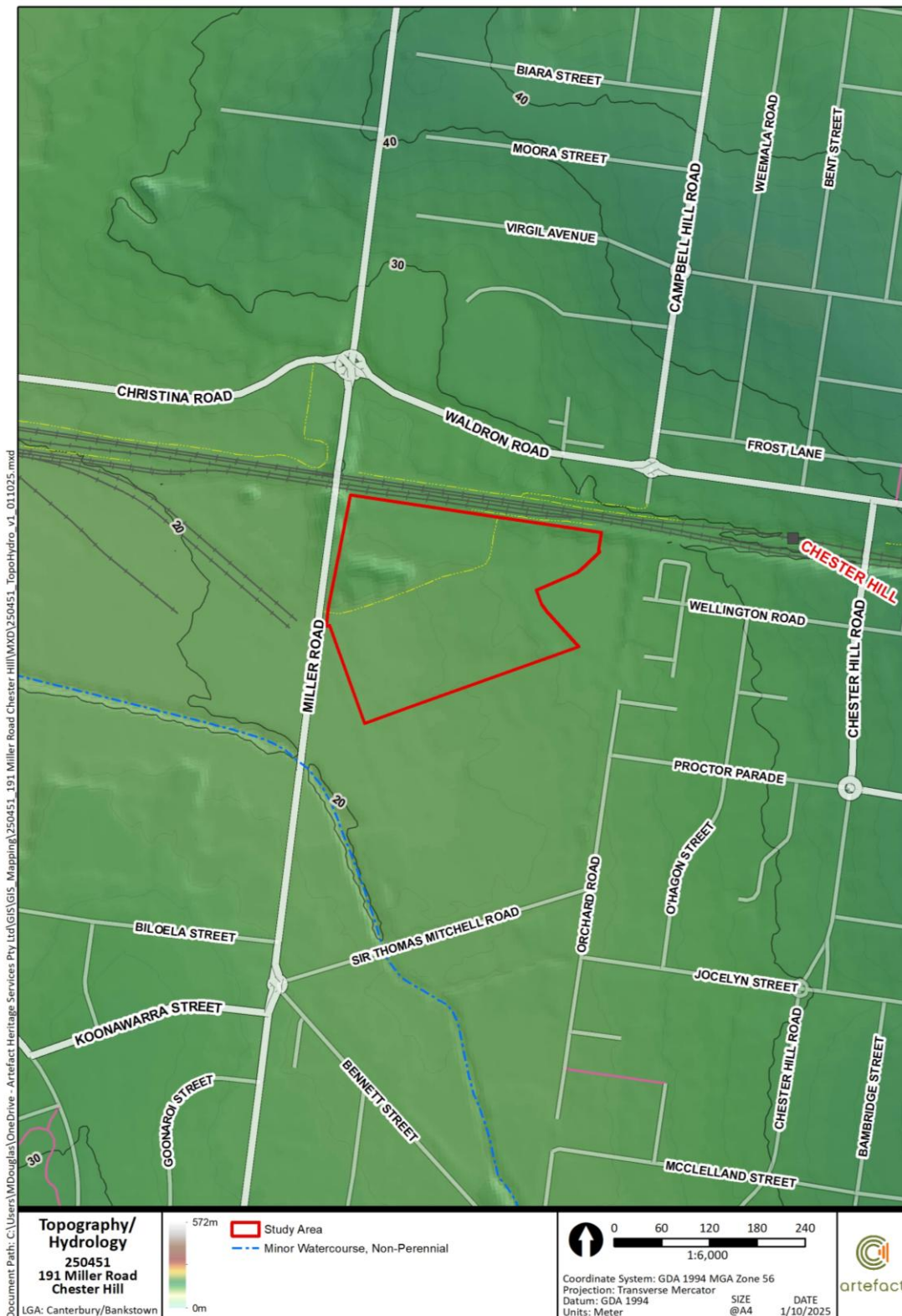


Figure 5: Soil landscapes within the study area

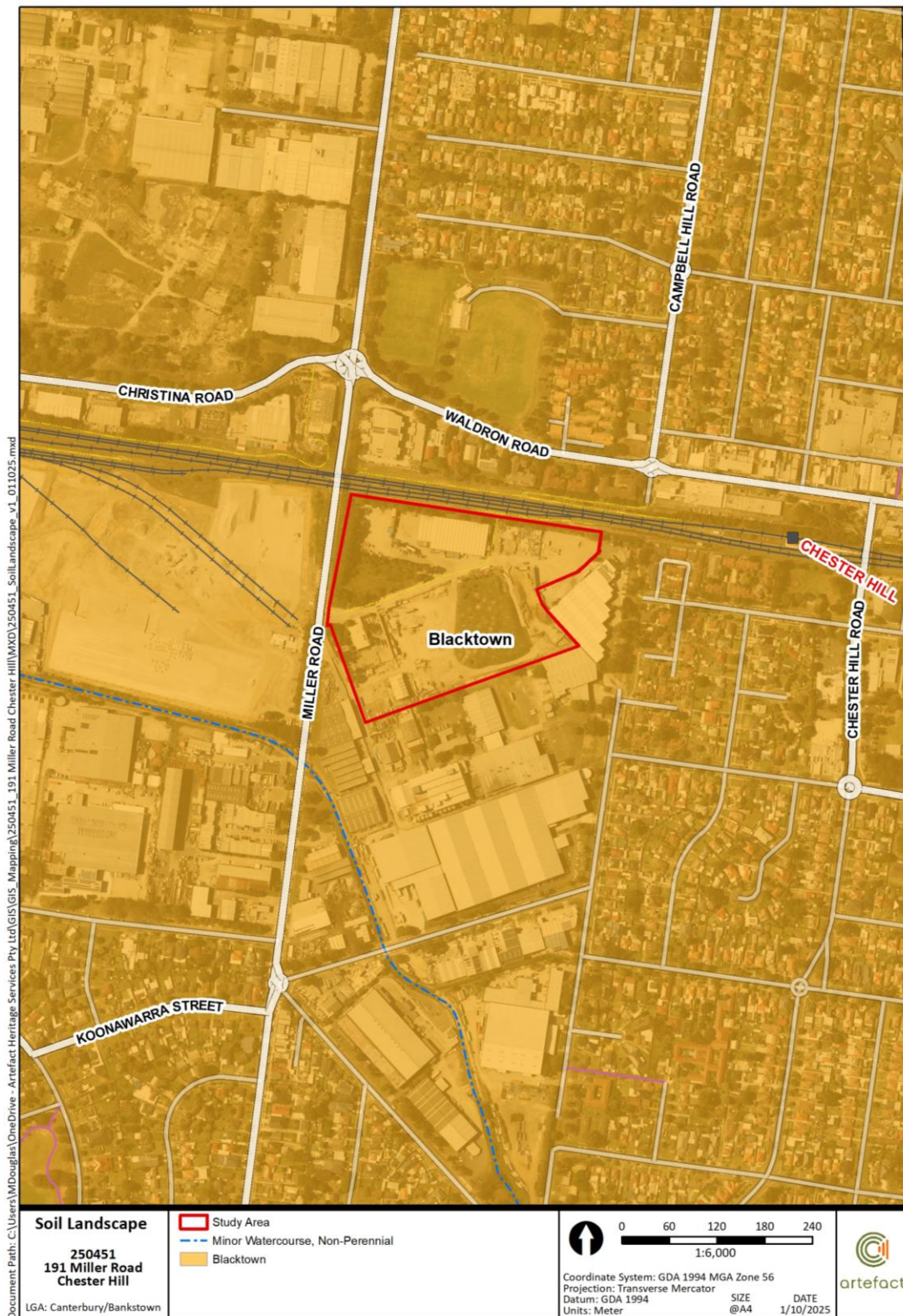


Figure 6: Aerial imagery of the study area from 1951 (Source: NSW Historic Imagery Viewer)



Figure 7: Aerial imagery of the study area from 1971 (Source: NSW Historic Imagery Viewer)



Figure 8: Aerial imagery of the study area from 1978 (Source: NSW Historic Imagery Viewer)



Figure 9: Aerial imagery of the study area from 1986 (Source: NSW Historic Imagery Viewer)



Figure 10: Aerial imagery of the study area from 1998 (Source: NSW Historic Imagery Viewer)



3.0 STEP 4: VISUAL INSPECTION

A visual inspection of the subject area was undertaken to further investigate the environmental context of the study area and to determine if any Aboriginal objects were present as surface expressions. The visual inspection of the subject area was undertaken by Ginger-Rose Harrington (Artefact, Heritage Consultant) and Kelly Barton (Rangers Program Manager, Gandangara LALC). It was also attended by Athlene Kyle (LogiSpace) and Duncan Mitchell (LogiSpace).

The visual inspection was undertaken in fine weather conditions. Ground Surface Visibility (GSV) was estimated to be about <5% across the subject area due to the presence of buildings, shipping containers, concrete, gravel road base, stock piles, turfing and industrial waste (Figure 11-Figure 19). In areas of limited visibility, a variety of soils was observed, including medium brown soil containing gravels and sub angular rocks including demolition rubble; imported fill containing small-medium subangular rocks, demolition material and modern waste; and road base mixed with imported sandy fill (Figure 13-Figure 14, Figure 18). This indicates that A-Horizon soils have likely been highly disturbed, if not entirely removed, and implies extensive levels of disturbance throughout the study area. There were no areas of exposure of intact surfaces. Due to accessibility restrictions, the northwest corner of the study area was unable to be inspected.

The study area is located within an artificially modified open depression. The visual inspection confirmed the modification of the landscape, chiefly caused by bulk earthworks and the construction of buildings. Modification of the area includes the levelling of the lot through bulk excavation, the creation of large stockpiles and the introduction of fill to create large embankments bordering the site (Figure 12-Figure 16, Figure 18). Altogether, the study area was observed to be substantially modified and no evidence of any remnant natural landscape features present beneath the development was identified. This modification of the study area would have substantially disturbed the subsurface deposits, if not entirely removing them from the study area.

No Aboriginal objects were identified on ground surfaces during the inspection, nor was there identified any potential for intact Aboriginal objects to be present. This conclusion was supported by Kelly Barton who concluded there was low-nil archaeological potential due to the extensive disturbance of the site which would have removed any Aboriginal objects formerly present within the site. As a result, Barton recommended that construction works proceed following an Aboriginal heritage induction for all site workers and that an unexpected finds procedure be implemented.

Figure 11: Overview of Miller Road access point showing industrial waste, buildings, concrete and gravel road base. Note levelled ground surface.



Figure 12: Northward view of northern stockpile showing its height and turfing.



Figure 13: Exposed soils within northern stockpile. Note presence of modern waste, demolition material and imported fill.



Figure 14: Northeast view of central stockpile showing imported fill, shipping containers and gravel road base. Note levelled ground surface.



Figure 15: Northwest view of central stockpile. Note the presence of turfing and gravel road base.



Figure 16: Southwest overview of main road through study area showing concreting, shipping containers and buildings. Note levelled ground surface.



Figure 17: Southeast overview of main road through study area showing an industrial waste pile, shipping container and gravel road base.



Figure 18: Northwest overview of the study area showing piles of imported fill, gravel road base and the presence of buildings. Note levelled ground surface.



Figure 19: Southern overview of study area showing industrial waste pile, buildings and gravel road base.



Figure 20: Northward view of artificial embankment demarcating the northern boundary of the study area.



4.0 SUMMARY AND RECOMMENDATIONS

A summary of the responses to the Due Diligence questions are provided below (Table 3).

Table 3: Due Diligence questions and responses

Question		Answer Comment
Will the activity disturb the ground surface or any culturally modified trees	Y	The proposal involves the demolition of existing structures, removal of site vegetation, remediation of the site, associated site preparation and flood management works, and will therefore disturb the ground surface.
Are there any: - Confirmed AHIMS records - Other sources of information - Landscape features	N	The study area is located within 200m of water, which indicates that Aboriginal objects may be present according to the Due Diligence Code. However, the entire study area has been impacted by high levels of historical ground disturbance caused by the construction and demolition of buildings and bulk earthworks, whereby Aboriginal objects are unlikely to be present. Additionally, a review of the AHIMS register identified no previously registered Aboriginal sites within the study area or its vicinity.
Can harm to Aboriginal objects be avoided	Y	The absence of registered AHIMS sites within the study area or its vicinity, coupled with high levels of historical ground disturbance throughout the site including the construction and demolition of buildings and bulk earthworks, indicates a low likelihood for Aboriginal objects to be present. The proposal is therefore considered unlikely to impact Aboriginal objects.
Does a desktop assessment and visual inspection confirm the presence of Aboriginal objects, or that they are likely to be there	N	The desktop assessment concluded that high levels of historical ground disturbance throughout the site including the construction and demolition of buildings and bulk earthworks, indicates a low likelihood for Aboriginal objects to be present. This was confirmed during the visual inspection which identified no Aboriginal objects, evidence of likely Aboriginal objects nor evidence of remnant natural landscape features within the study area.
Is further assessment required	N	As the proposal has been assessed unlikely to impact Aboriginal objects, no further archaeological investigation is recommended and the proposed works can proceed with caution.

The study area does not contain and is not likely to contain any Aboriginal objects. It is recommended that:

- No further Aboriginal heritage assessment or investigation are required, and the proposed works can proceed with caution.
- This Due Diligence assessment does not constitute consent to harm Aboriginal objects, nor it is a 'site clearance' mechanism to allow activities to occur in an area where Aboriginal objects are likely or known to be present.
- An Aboriginal heritage induction should be undertaken by all site workers prior to the commencement of the proposed works.
- If Aboriginal objects are discovered during the proposed works, works must stop immediately and an assessment must be undertaken in accordance with Part 6 of the *National Parks and Wildlife Act 1974*. If the activity cannot avoid harm to Aboriginal objects, works cannot proceed until an Aboriginal Heritage Impact Permit has been issued.

5.0 References

Artefact Heritage, 2022. *Aboriginal Heritage Due Diligence Assessment – 149 Orchard Road Chester Hill*.

Coast History & Heritage Pty Ltd, 2019. *220, 226 & 246 Miller Road and 1 & 3 Monier Square Villawood Aboriginal Heritage Planning Advice for Prospective Purchase*.

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PSM Consult Pty Ltd, 2025. *191 Miller Road Chester Hill Geotechnical Design Advice Addendum*.

White, B. and J. McDonald (2010), "Lithic Artefact Distribution in the Rouse Hill Development Area, Cumberland Plain, New South Wales", in *Australian Archaeology* (70), pp. 29-3