



View east along the proposed access road to the Project.

ABORIGINAL DUE DILIGENCE ASSESSMENT REPORT

POULTRY BROILER FARM AT 755 WARRAH RIDGE ROAD

LIVERPOOL PLAINS LOCAL GOVERNMENT AREA

MARCH 2026

Report prepared by
OzArk Environment & Heritage
for Agright Griffith Pty Ltd

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Acknowledgement

OzArk acknowledge the traditional custodians of the area on which this assessment took place and pay respect to their beliefs, cultural heritage, and continuing connection with the land. We also acknowledge and pay respect to the post-contact experiences of Aboriginal people with attachment to the area and to the Elders, past and present, as the next generation of role models and vessels for memories, traditions, culture and hopes of local Aboriginal people.

EXECUTIVE SUMMARY

OzArk Environment & Heritage (OzArk) has been engaged by PSA Consulting (PSA), on behalf of Agright Griffith Pty Ltd (the proponent) to complete an Aboriginal due diligence heritage assessment for the proposed poultry broiler farm (the Project) at 755 Warrah Ridge Road in the Liverpool Plains Local Government Area (LGA).

The study area consists of approximately 46 hectares (ha) of gently undulating agricultural land, approximately 28 kilometres (km) southwest of Quirindi within Lot 42 DP37629.

A search of the Aboriginal Heritage Information Management System (AHIMS) on 13 January 2026 was undertaken over a 20 x 20 km area centred on the study area. There are no previously registered sites within the study area.

The visual inspection of the study area was undertaken by OzArk Archaeologist, Will Marris, on 23 January 2026. The visual inspection of the study area did not record any Aboriginal sites or objects and no landforms with subsurface archaeological potential were identified.

The undertaking of the due diligence process resulted in the conclusion that the proposed works will have an impact on the ground surface, however, no Aboriginal objects or intact archaeological deposits will be harmed by the Project. This moves the Project to the following outcome:

AHIP application not necessary. Proceed with caution. If any Aboriginal objects are found, stop work, and notify Enviro Line (131 555; info@environment.nsw.gov.au). If human remains are found, stop work, secure the site, and notify NSW Police and Heritage NSW.

To ensure the greatest possible protection to the area's Aboriginal cultural heritage values, the following recommendations are made:

1. The proposed work may proceed without further archaeological investigation.
2. All land and ground disturbance activities must be confined to within the study area, as this will eliminate the risk of harm to Aboriginal objects that may be in adjacent landforms. Should the parameters of the Project extend beyond the assessed areas, then further archaeological assessment may be required.
3. This assessment has concluded that there is a low likelihood that the proposed work will adversely harm Aboriginal cultural heritage items or sites. If during works, however, Aboriginal artefacts or skeletal material are noted, all work should cease and the procedures in the *Unanticipated Finds Protocol* (**Appendix 2**) should be followed.
4. Inductions for work crews should include a cultural heritage awareness procedure to ensure they recognise Aboriginal artefacts (see **Appendix 3**) and are aware of the

legislative protection of Aboriginal objects under the *National Parks and Wildlife Act 1974* and the contents of the *Unanticipated Finds Protocol*.

5. The information presented here meets the requirements of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*. It should be retained as shelf documentation for five years as it may be used to support a defence against prosecution in the event of unanticipated harm to Aboriginal objects.
6. Should work related to this Project proceed 12 months or more after the completion of the AHIMS search (13 January 2027), another search will need to be completed as outlined In Section 7.4 of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*.

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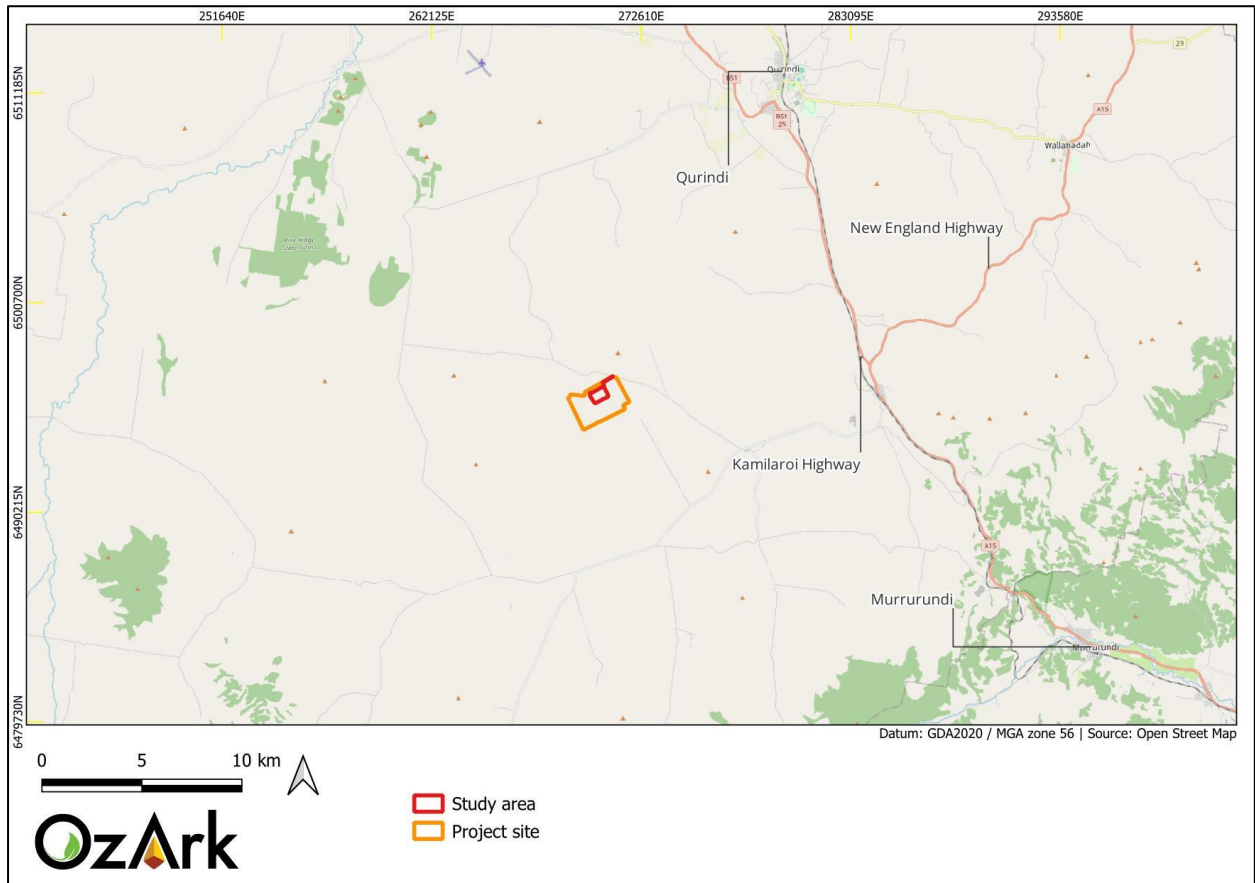
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1 INTRODUCTION

1.1 BRIEF DESCRIPTION OF THE PROJECT

OzArk Environment & Heritage (OzArk) has been engaged by PSA Consulting (PSA), on behalf of Agright Griffith Pty Ltd (the proponent) to complete an Aboriginal due diligence heritage assessment for the proposed poultry broiler farm (the Project) at 755 Warrah Ridge Road in the Liverpool Plains Local Government Area (LGA) (**Figure 1-1**).

Figure 1-1. Map showing the location of the Project.



1.2 THE PROJECT

The Project is identified under *Item 22 Livestock Processing Industries* within Schedule 3 of the *Environmental Planning and Assessment Regulation 2021* and accordingly is identified as Designated Development. The proponent is therefore seeking development consent for the Project under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

The Secretary's Environmental Assessment Requirements (SEARs) for the Project (SEAR 2036) were issued by the Department of Planning, Housing and Infrastructure (DPHI) on 12 November 2025.

The SEARs identify Aboriginal heritage as a key consideration to be addressed as part of the Environmental Impact Statement (EIS).

1.2.1 Proposed work

The Project will be comprised of fourteen (14) poultry sheds. The proposed 172 metre (m) by 18.7 m sheds (3,216.4 m²) will be constructed in two rows running north south (**Figure 1-2**).

The Project will also include grain storage silos, staff amenities, access roads, gas storage infrastructure, farm workshop, water pipes, a stormwater retention dam, pump shed and water storage tanks along with two new managers houses. Other ancillary, supporting infrastructure will include a solar farm and an associated battery energy storage system for electricity production and a stormwater retention dam.

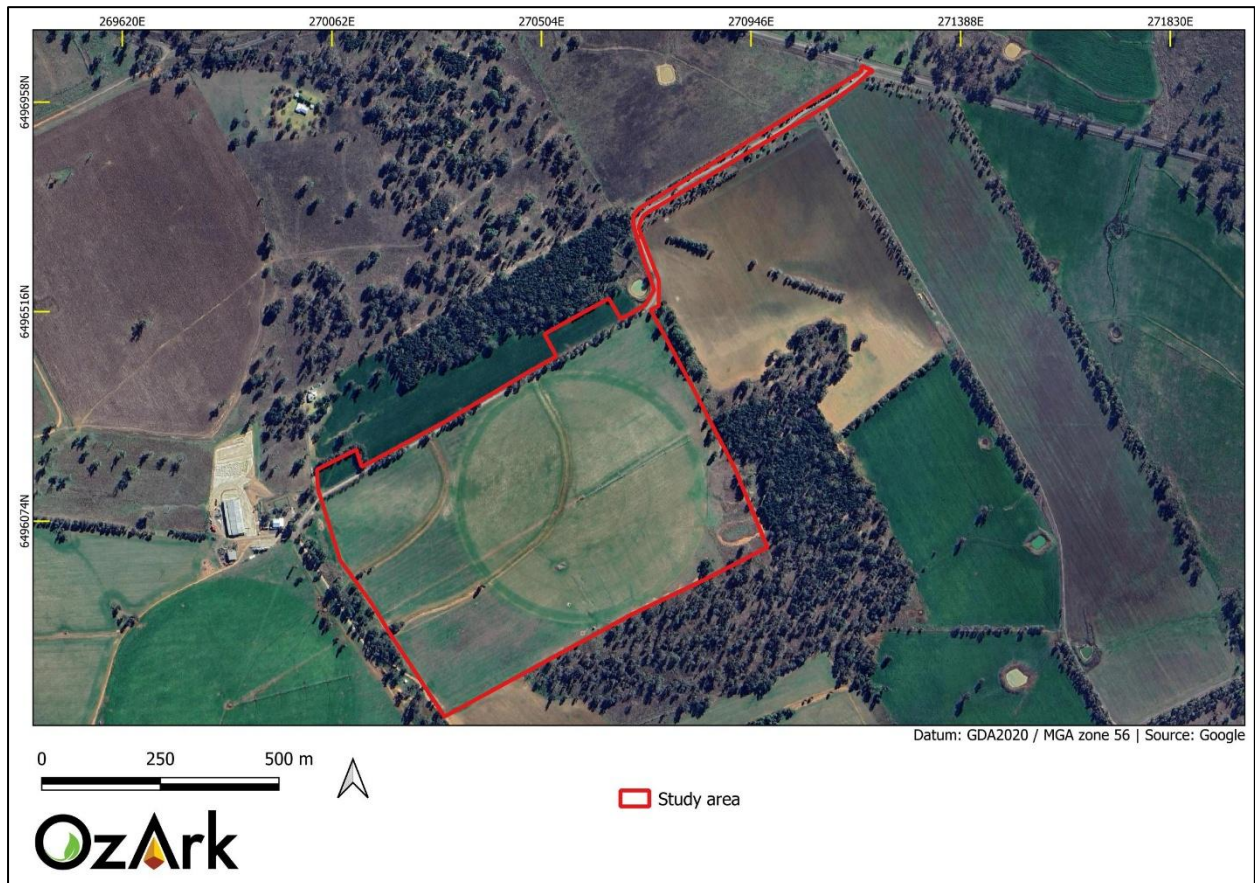
Figure 1-2: Conceptual layout of the Project.



1.3 STUDY AREA

The study area consists of approximately 47 hectares (ha) of gently undulating agricultural land, located at 755 Warrah Ridge Road, Warrah Ridge NSW, approximately 28 kilometres (km) southwest of Quirindi within Lot 42 DP37629. The study area is shown on **Figure 1-3**.

Figure 1-3: Aerial showing the study area.



1.4 ASSESSMENT APPROACH

The desktop and visual inspection component for the study area follows the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (due diligence; DECCW 2010). The field inspection followed the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales* (OEH 2011).

2 ABORIGINAL DUE DILIGENCE ASSESSMENT

2.1 INTRODUCTION

Section 57 of the National Parks and Wildlife Regulation 2019 (NPW Regulation) made under the *National Parks and Wildlife Act 1974* (NPW Act) advocates a due diligence process to determining likely impacts on Aboriginal objects. Carrying out due diligence provides a defence to the offence of harming Aboriginal objects and is an important step in satisfying Aboriginal heritage obligations in NSW.

2.2 DEFENCES UNDER THE NPW REGULATION

2.2.1 Low impact activities

The first step before application of the due diligence process itself is to determine whether the proposed activity is a “low impact activity” for which there is a defence in the NPW Regulation. The exemptions are listed in Section 58 of the NPW Regulation (DECCW 2010: 6).

The construction of the Project is not considered a ‘low impact activity’ and the due diligence process must be applied.

2.2.2 Disturbed lands

Relevant to this process is the assessed levels of previous land-use disturbance.

The NPW Regulation Section 58 (DECCW 2010: 18) define disturbed land as follows:

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.

Examples include 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) and construction of earthworks.

As sections of the proposed work are in previously cleared landforms which contain property fences, access tracks, and cropped agricultural land, it could be considered that the proposed work is occurring in ‘disturbed land’. However, the proposed works are not in areas where the land’s surface has been changed in a clear and observable manner, and the due diligence process must be applied.

In summary, it is determined that the Project must be assessed under the Due Diligence Code of Practice. The reasoning for this determination is set out in **Table 2-1**.

Table 2-1: Determination of whether Due Diligence Code of Practice applies.

Item	Reasoning	Answer
Is the activity to be assessed under Division 4.7 (state significant development) or Division 5.2 (state significant infrastructure) of the EP&A Act?	The Project will be assessed under Part 4 of the EP&A Act.	No
Is the activity exempt from the NPW Act or NPW Regulation?	The Project is not exempt under this Act or Regulation.	No
Do either or both apply: Is the activity in an Aboriginal place? Have previous investigations that meet the requirements of this Code identified Aboriginal objects?	The activity will not occur in an Aboriginal place. No previous investigations have been undertaken for this Project.	No
Is the activity a low impact one for which there is a defence in the NPW Regulation?	The Project is not a low impact activity for which there is a defence in the NPW Regulation.	No
Is the activity occurring entirely within areas that are assessed as 'disturbed lands'?	The Project is not entirely within areas of high modification.	No
Due Diligence Code of Practice assessment is required		

2.3 APPLICATION OF THE DUE DILIGENCE CODE OF PRACTICE TO THE PROJECT

To follow the generic due diligence process, a series of steps in a question/answer flowchart format (DECCW 2010: 10) are applied to the proposed impacts and the study area, and the responses documented.

2.3.1 Step 1

Will the activity disturb the ground surface or any culturally modified trees?

Yes, the Project will impact the ground surface and may impact culturally modified trees.

The proponent is proposing to construct a new poultry farm consisting of 14 sheds, a stormwater retention dam, access tracks, and ancillary buildings to allow for the daily operating of the farm. The earthworks associated with the construction of foundations and access tracks will impact the ground surface (refer to **Section 1.2.1**).

Culturally modified trees may be harmed by the Project as a small amount of mature native vegetation remains within the study area.

2.3.2 Step 2a

Are there any relevant confirmed site records or other associated landscape feature information on AHIMS?

No, there are no previously recorded sites within the study area.

A search of the Aboriginal Heritage Information Management System (AHIMS) on 13 January 2026 was undertaken over a 20 x 20 km area centred on the study area (GDA Zone 56, Eastings: 260449-280449, Northings: 6485888-6505888; **Appendix 1**). The search returned four

previously registered Aboriginal sites. There are no previously registered sites within the study area. **Figure 2-1** shows the previously recorded sites in relation to the study area and **Table 2-2** provides details of these sites.

The majority of AHIMS recordings are either ad hoc or development, so a limited number of previously recorded sites may be result of a lack of investigation rather than an absence of archaeology within the search area.

The nearest site to the study area is 29-5-004, a grinding groove located 7.5 km to the northeast. The only two site types returned in the AHIMS search area are grinding grooves and a culturally modified (scarred) tree, which are both relatively rare regionally. As there are no perennial waterways in the study area and very little remnant mature vegetation, the presence of these site types is considered unlikely.

Table 2-2: Site types and frequencies of AHIMS sites near the study area.

AHIMS ID	Site name	Site type	Site status
29-5-0001	Warrah Ridge;	Grinding groove	Valid
29-5-0003	Waverton; Watagarra Station;	Grinding groove	Valid
29-5-0004	Boxwood; Bonny Ridge; Colly Plains;	Grinding groove	Valid
29-4-0047	BBS; Walhallow LALC; Yondilla ST1	Culturally modified tree	Valid

Figure 2-1: Previously recorded sites in relation to the study area.



2.3.3 Step 2b

Are there any other sources of information of which a person is already aware?

No, there are no other sources of information that would indicate the presence of Aboriginal objects in the study area.

2.3.3.1 *Regional archaeological context*

Purcell 2002

Purcell conducted a cultural heritage study focussing on the entire Brigalow Belt South (BBS) bioregion in 2002. He was able to record a total of 1,110 Aboriginal sites throughout the BBS bioregion, 217 of which were previously unrecorded.

The bioregion covers approximately 52,000 square kilometres, making up 6.5% of the total land area of NSW including Gunnedah, Breeza, and Willow Tree. Not only did the assessment record Aboriginal artefacts, but Purcell also conducted 110 oral interviews with Aboriginal people from 28 Aboriginal organisations including Local Aboriginal Land Councils, Aboriginal Health Services, traditional Aboriginal interest groups, and regional land councils.

Over 90% of artefacts recorded by Purcell were located within 200 m of waterways with the highest number of sites occurring in alluvial landforms (n=668). Purcell includes seven separate landforms in the 'alluvial' grouping including Alluvial fan, Alluvial terrace, Alluvium, Channel, Floodplain, Flood channel, Gilgai, Wetland & Swamp, and Paleochannel. Each of these landforms is closely associated with rivers, creeks, and waterways supporting the paradigm that Aboriginal sites are more likely to be near waters. A total of 17 different Aboriginal site types were recorded throughout the bioregion which highlights the diversity in Aboriginal land use among different landforms.

Wilson and McAdam 2000

In 1999, Wilson and McAdam (2000) undertook an archaeological study of Aboriginal sites across the Tamworth LGA, adjacent to the Liverpool Plains LGA. The purpose of the study was to identify sites of Aboriginal and archaeological significance within the Tamworth area. The study was undertaken in three stages.

The first stage aimed to produce a preliminary predictive model for Aboriginal archaeological site locations. Stage 2 tested the predictive model during 20 days of site survey across the Project Area. Stage 3 focused on revising the predictive model based on results from Stage 2 and allocates Aboriginal and archaeological significance to the newly recorded sites.

The survey focused on three sectors: northern, south-eastern, and south-western. The study found that the number of sites located was directly related to the size of the area surveyed and

not to the degree of exploitation of that area by Aboriginal people in pre-contact times (Wilson & McAdam 2000).

Prior to the assessment, 28 Aboriginal archaeological sites were registered on the AHIMS database for this area. As a result of the 20 days of fieldwork during Stage 2, 38 previously unrecorded sites were recorded. Site types included isolated finds (n=8), artefact scatters (n=27), and scarred trees (n=3). Wilson and McAdam (2000) note that many of the recorded sites could be grouped together into site complexes and were given high archaeological significance.

Two “Places” with high significance to the Aboriginal community were also documented by the study. The two “Places” include the site of an artefact scatter in the Coledale area and the North Tamworth Aboriginal Reserve (known as the “Camp”) which was located on Forest Road.

As a result of the study, Wilson and McAdams (2000) provided the following predictions:

- Artefact scatters can be expected both north and south of the Peel River
- Artefact scatters are likely to vary in the raw material types they contain and the percentages of the raw material types they contain, depending on whether they are located to the north of the south of the Peel River
- The Peel River appears to have been a shared but rarely crossed resource zone
- The largest artefact scatters are most likely to be found on the creek terraces and lower slopes on red brown soils and above flood level. Artefact scatters will also be found on level areas associated with saddles, ridgetops, and crests, especially in areas that provide good views across wide areas. Occasionally artefact scatters will be in areas of steep gradient, but these will normally be found to be eroding and washing downslope from level areas upslope
- The size of the artefact scatters will be dependent on the availability of water. The largest sites will be in areas close to large waterholes on the major watercourses, the next largest sites will be near a spring or swamp. The smallest sites will generally be located on intermittent watercourses
- Artefact scatters are likely to be in areas close to ecotones
- The most common artefact types in scatters will be flakes, retouched flakes, flaked pieces, and cores. Axes, anvils, hammerstones, and grindstones will be extremely rare and when found, will generally be in the larger sites close to a watercourse that supplied permanent water (i.e., waterholes, springs, swamps)
- Artefacts in areas that have been subject to cultivation and disturbance by hard-hoofed animals will be more likely to be broken than those not subject to cultivation and only subject to disturbance by soft-footed animals.
- Scarred trees can be in any topographic zone but are most likely within a short distance of a water course. This may be a major watercourse or a minor feeder tributary
- Scarred trees located on the floodplain of the major watercourses will often have had bark removed to manufacture a canoe

- Scarred trees away from the major watercourses and on the minor tributary systems are more likely to have had bark removed to manufacture coolamons or shields
- Scarred trees are likely to be near other sites, especially artefact scatters.

2.3.3.2 *Local archaeological context*

OzArk 2017

OzArk were engaged to complete an Aboriginal Due Diligence Assessment report for a residential rezoning proposal in Quirindi located 20 km northeast of the study area. The assessment covered an area of 345 ha of agricultural grazing land identified by the Liverpool Plains Growth Management Strategy 2009 as an area suitable for future residential development.

The assessment recorded two previously unrecorded Aboriginal sites. Both sites are culturally modified trees (Bellsgate-ST1 and Bellsgate-ST2) situated on gentle slopes and consist of elongated scars facing southwest. No artefacts or areas of potential archaeological deposits (PADs) are associated within either of the scarred trees.

Kelleher Nightingale Consulting 2020

In 2020, Kelleher Nightingale Consulting Pty Ltd (KNC) conducted an Aboriginal heritage assessment for a wind farm located at Nundle, approximately 21 km northeast of the study area. The assessment was situated in mountain ranges and associated valleys. The archaeological investigation recorded seven Aboriginal sites, three artefact scatters, four isolated finds, and one PAD. The first artefact scatter, Hills of Gold AFT 1, is an open site situated on the alluvial bank of a tributary creek line which fed into Wardens Brook. The site is situated on an elevated, gently sloping to flat ridge landform which steeply dropped in the west to meet the Peel River. The second artefact scatter, Hills of Gold AFT 2, is an open site on a moderately sloping creekbank in a gully landform near an unnamed tributary creek which flows directly into the Peel River. Meanwhile, Hills of Gold AFT 4, consists of two flakes identified on the crest of a steep spur landform associated with Morgans Gully.

The isolated finds identified during this investigation were primarily recorded within areas of high disturbance including road corridors and areas cleared for agricultural activities. Furthermore, most of the isolated find sites are identified in areas of exposure across a variety of elevated landforms including on a lower hillslope above a raised creek bank, a knoll crest, a low rise associated with a tributary creek, and on the ridge of a saddle landform. This suggests that site density and integrity generally decreased on elevated ridge, saddle, or spur landforms not directly associated with a tributary creek or drainage feature.

OzArk 2024a

OzArk undertook an Aboriginal due diligence assessment report for Werris Creek Poultry Farm approximately 30 km northeast of the study area. The project area consisted of approximately

223 ha of gently undulating plains. One previously unrecorded isolated find was identified during the visual inspection. The artefact is described as a flaked piece manufactured of chalcedony. The flake was identified in area of considerable ground disturbance, and the site was considered unlikely to contain subsurface archaeological material.

OzArk 2024b

OzArk (2024b) developed an Archaeological Technical Report (ATR) for preliminary works for the Hunter Gas Pipeline project located approximately 30 km north of the study area. The survey area consisted of five land parcels, covering approximately 36 ha. The land is classified as RU1 and has been cleared for the purpose of primary production, being dominated by highly disturbed, non-native pastures. One isolated stone artefact (Quirindi IF-1, AHIMS # 29-2-0450), was identified in a disturbed location within the survey area.

OzArk 2025

OzArk (2025) undertook a due diligence assessment at of 985 m² of land at Quirindi High School approximately 19 km northeast of the study area. The study area consisted of an elevated, level landform within existing school grounds. No Aboriginal sites were identified. Due to the high level of prior disturbance and landforms present, the subsurface potential within the study area was determined as low.

Conclusion

The archaeological investigations detailed in **Sections 2.3.3.1** and **2.3.3.2** indicate that most artefact sites will be recorded within 200 m of a waterway and that larger and more complex sites will be recorded closer to larger waterways with permanent water sources. While the region contains a variety of site types, artefact sites are the most common, generally because stone artefacts are more durable than other site types such as culturally modified trees that have disappeared from the landscape. Studies in the region have noted that a variety of modern disturbances have impacted the integrity of archaeological sites, most frequently from impacts associated with intensive cropping.

Regarding the study area, the prediction is that sites will not be frequently recorded as there is not a nearby waterway and the area has been extensively impacted by cropping activities. These factors suggest that sites would have been infrequent prior to British settlement, and if they were present, they will have either have been removed (such as culturally modified trees) or disturbed (as in the case of artefact scatters). As such, the primary site type likely to be recorded in the study area will be isolated finds, potentially as the remains of dispersed low density artefact scatters that may have once existed in the study area.

2.3.4 Step 2c

Are there any landscape features that are likely to indicate presence of Aboriginal objects?

Are there any landscape features that are likely to indicate presence of Aboriginal objects?

No, there are no portions of the study area contain landforms with identified archaeological sensitivity.

The Due Diligence Code of Practice (DECCW 2010) refers to several landscape features which have higher potential to contain Aboriginal objects. These include:

- Within 200 m of 'waters'
 - Located within a sand dune system
 - Located on a ridge top, ridge line or headland
 - Located within 200 m below or above a cliff face
 - Within 20 m of or in a cave, rock shelter, or a cave mouth
- on land that is not disturbed land.

The study area is located over 200 m from the nearest named waterway and no other landscape features with identified archaeological potential are present within the study area.

While an ephemeral drainage line is approximately 120 m north of the study area (**Figure 1-3**), the nearest perennial waterway to the study area is Chilcott's Creek located 11 km to the east

A 'no' answer for Question 2 a-c, results in the outcome that the Project can proceed with caution without further assessment.

Although not required by the due diligence process, the proponent has elected to apply the precautionary principle and proceed to visual inspection of the study area (**Section 2.3.6**) in order to ground-truth the findings of the above desktop level assessment.

2.3.5 Step 3

Can harm to Aboriginal objects or disturbance of archaeologically sensitive landscape features be avoided?

Known Aboriginal objects and landforms with identified archaeological sensitivity will not be harmed by the Project.

As no archaeologically sensitive landforms or known Aboriginal objects are within the study area, the due diligence process does not require a visual inspection. However, the proponent has elected to apply the precautionary principle and proceed to visual inspection of the study area (**Section 2.3.6**)

2.3.6 Step 4

Does a desktop assessment and visual inspection confirm that there are Aboriginal objects or that they are likely?

No, there are no Aboriginal objects within the study area.

The visual inspection of the study area was undertaken by OzArk Archaeologist, Will Marris, on 23 January 2026. The study area was inspected via a pedestrian survey (**Figure 2-2**). **Figure 2-3** shows views of the study area.

The study area was confirmed to be situated on gently undulating landforms which have undergone historic vegetation clearance, as well as a range of agricultural land disturbances including contour banking, ploughing, livestock grazing, and fencing. Unsealed access tracks and water tanks are also present within the study area.

All examples of mature native vegetation were inspected; however, no signs of cultural modification were observed.

Overall ground surface exposure (GSE) was relatively high across (50%) as the crop had recently been harvested leaving most of the soil exposed. Artificial drainage lines also afforded areas of good ground exposures. Ground surface visibility (GSV) was also relatively high, averaging 75%, within these portions of exposed ground. GSE was lower in the proposed location of the manager residences and western extent of the study area due to dense grass coverage, however, subsurface potential was assessed as low.

The visual inspection of the study area did not record any Aboriginal sites or objects and no landforms with subsurface archaeological potential were identified.

Figure 2-2: Survey coverage within the study area.

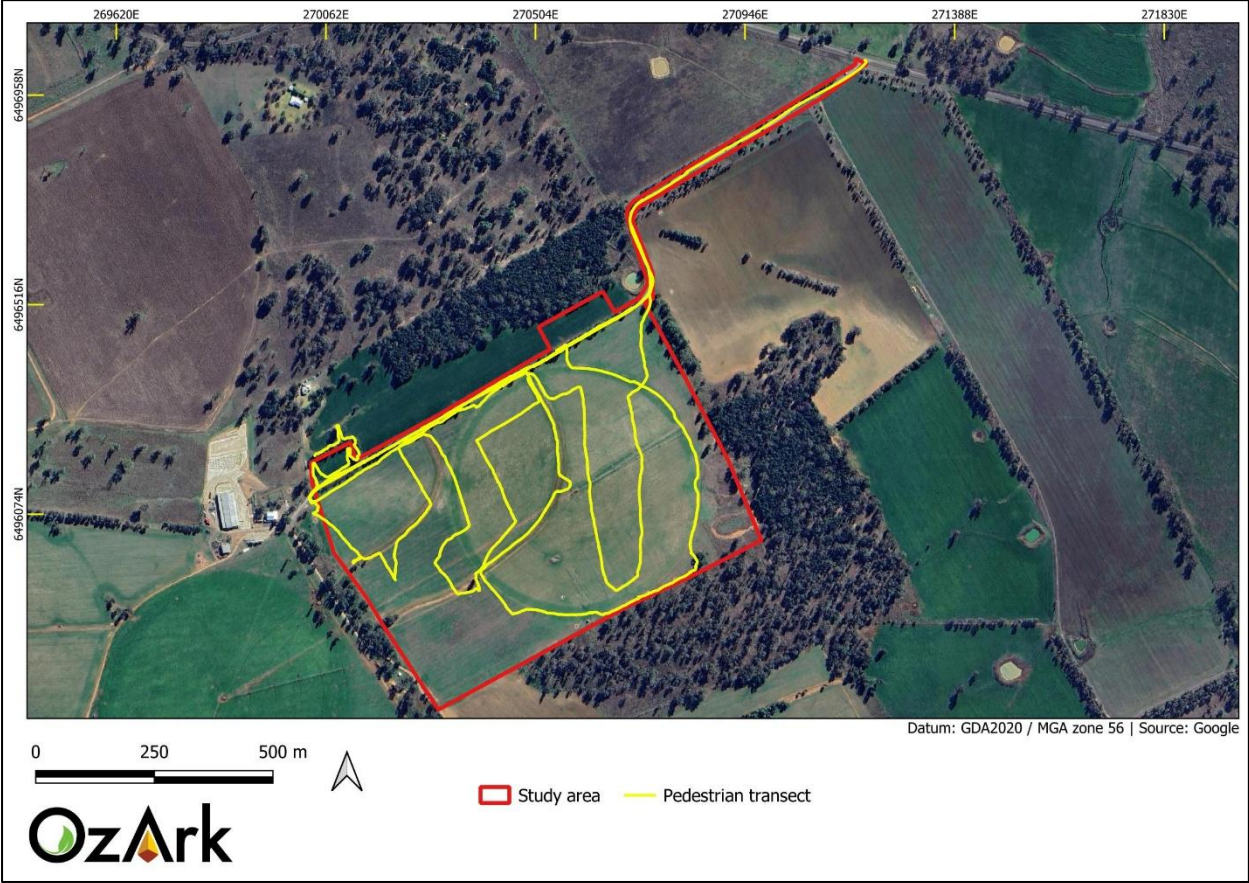


Figure 2-3: Views of the study area.

	
1. View southwest along proposed access track.	2. View northeast across the proposed location of manager residences, showing mature vegetation (no cultural modification).
	
3. View of GSE afforded by artificial drainage.	4. View of northeast across study area, showing GSE afforded by cropping. Recent disturbances from tractors.
	
5. View southeast across study area.	6. GSE in bioturbated soil along the southern boundary of the study area.

2.4 CONCLUSION

The due diligence process has resulted in the outcome that an Aboriginal Heritage Impact Permit (AHIP) is not required. The reasoning behind this determination is set out in **Table 2-3**.

Table 2-3: Due Diligence Code of Practice application.

Step	Reasoning	Answer
Step 1 Will the activity disturb the ground surface or any culturally modified trees?	The proposed works will disturb the ground surface through earthworks required for construction activities. The Project has potential to impact mature, native vegetation and therefore there is the potential culturally modified trees to be harmed if they are present.	Yes
If the answer to Step 1 is 'yes', proceed to Step 2		
Step 2a Are there any relevant records of Aboriginal heritage on AHIMS to indicate presence of Aboriginal objects?	AHIMS indicated that there are no Aboriginal sites within the study area.	No
Step 2b Are there other sources of information to indicate presence of Aboriginal objects?	There are no other sources of information to indicate that Aboriginal objects are likely in the study area, although it is noted that there is a general likelihood for landforms in the region to contain Aboriginal objects.	No
Step 2c Will the activity impact landforms with archaeological sensitivity as defined by the Due Diligence Code?	Landforms with identified archaeological sensitivity are not present in the study area and will therefore not be harmed by the Project.	No
If the answer to any stage of Step 2 is 'yes', proceed to Step 3		
Step 3 Can harm to Aboriginal objects listed on AHIMS or identified by other sources of information and/or can the carrying out of the activity at the relevant landscape features be avoided?	The Project will not impact landforms with archaeological sensitivity or harm known Aboriginal objects. However, the proponent has elected to proceed to Step 4 to ground-truth the conclusions made at a desktop level.	Yes
If the answer to Step 3 is 'no', a visual inspection is required. Proceed to Step 4.		
Step 4 Does the visual inspection confirm that there are Aboriginal objects or that they are likely?	The visual inspection recorded no Aboriginal objects in the study area. Landforms with identified archaeological sensitivity that were identified at a desktop level were found during the inspection to have low archaeological potential.	No
Conclusion		
AHIP not necessary. Proceed with caution.		

3 MANAGEMENT RECOMMENDATIONS

The undertaking of the due diligence process resulted in the conclusion that the proposed works will have an impact on the ground surface, however, no Aboriginal objects or intact archaeological deposits will be harmed by the Project. This moves the Project to the following outcome:

AHIP application not necessary. Proceed with caution. If any Aboriginal objects are found, stop work, and notify Enviro Line (131 555; info@environment.nsw.gov.au). If human remains are found, stop work, secure the site, and notify NSW Police and Heritage NSW.

To ensure the greatest possible protection to the area's Aboriginal cultural heritage values, the following recommendations are made:

1. The proposed work may proceed without further archaeological investigation.
2. All land and ground disturbance activities must be confined to within the study area, as this will eliminate the risk of harm to Aboriginal objects that may be in adjacent landforms. Should the parameters of the Project extend beyond the assessed areas, then further archaeological assessment may be required.
3. This assessment has concluded that there is a low likelihood that the proposed work will adversely harm Aboriginal cultural heritage items or sites. If during works, however, Aboriginal artefacts or skeletal material are noted, all work should cease and the procedures in the *Unanticipated Finds Protocol* (**Appendix 2**) should be followed.
4. Inductions for work crews should include a cultural heritage awareness procedure to ensure they recognise Aboriginal artefacts (see **Appendix 3**) and are aware of the legislative protection of Aboriginal objects under the NPW Act and the contents of the *Unanticipated Finds Protocol*.
5. The information presented here meets the requirements of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*. It should be retained as shelf documentation for five years as it may be used to support a defence against prosecution in the event of unanticipated harm to Aboriginal objects.
6. Should works related to this Project proceed 12 months or more after the completion of the AHIMS search (13 January 2027), another search will need to be completed as outlined in Section 7.4 of the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*.

REFERENCES

- Burra Charter The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance. International Council on Monuments and Sites. 2013.
- Clarke 2004 Clarke, P.A. 2004. The historical origins of late 20th century Aboriginal English in southern Australia. Manuscript. Adelaide. South Australian Museum Archives.
- DECCW 2010 Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW. Department of Environment, Climate Change and Water. 2010.
- Gott 1983 Gott, B. 1983. Murnong – *Microseris scapigera*. Australian Aboriginal Studies, Issue 2.
- KNC 2020 Kelleher Nightingale Consulting Pty Ltd. 2020. Hills of Gold Wind Farm SSD-9679: Aboriginal Cultural Heritage Assessment. Report to Wind Energy Partners Pty Ltd.
- OEH 2011 Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales. Office of Environment and Heritage. 2011.
- O'Rourke 1997 O'Rourke, M. 1997. Kamilaroi lands: North-central New South Wales in the early 19th century. Self-published.
- OzArk 2017 OzArk Environment & Heritage. 2017. Aboriginal Due Diligence Archaeology Assessment: Quirindi North Rural Residential Rezoning of 345ha of Land. Report to Liverpool Plains Shire Council.
- OzArk 2024a OzArk Environment & Heritage. 2024. *Aboriginal Due Diligence Assessment Report: Werris Creek Poultry Farm*. Report to PSA Consulting.
- OzArk 2024b OzArk Environment & Heritage. 2024. *Archaeological Technological Report: Preliminary Works, Hunter Gas Pipeline Project*. Report to Santos.
- OzArk 2025. OzArk Environment & Heritage. 2025. *Aboriginal Due Diligence Assessment Report: Quirindi High School Multipurpose Building*. Report to NSW Department of Education.
- Purcell 2002 Purcell, P. 2002. Brigalow Belt South Bioregion Aboriginal Cultural Heritage Assessment. Report to National Parks and Wildlife Service, NSW.
- Tindale 1974 Tindale N. Aboriginal Tribes of Australia. ANU Press, Canberra.

Wilson & McAdam 2000

Wilson, J. and L. McAdam. The Tamworth Aboriginal/Archaeological Site Study. A report prepared for the Tamworth City Council.

APPENDIX 1: AHIMS SEARCH RESULTS



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 6710

Client Service ID : 1081566

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
29-5-0001	Warrah Ridge;	AGD	56	266300	6503500	Open site	Valid	Grinding Groove : -	Axe Grinding Groove	
Contact		Recorders		G Hammond		Permits				
29-5-0003	Waverton;Watararra Station;	AGD	56	270500	6505210	Open site	Valid	Grinding Groove : -	Axe Grinding Groove	
Contact		Recorders		J Griffiths,Quirindi District Historical Society		Permits				
29-5-0004	Boxwood;Bonny Ridge;Colly Plains;	AGD	56	271660	6503500	Open site	Valid	Grinding Groove : -	Axe Grinding Groove	
Contact		Recorders		Nungareo LALC		Permits				
29-4-0047	BBS; Walhallow LALC; Yondilla ST1	AGD	56	260924	6505222	Open site	Valid	Modified Tree (Carved or Scarred) : 1		98931
Contact		Recorders		Archaeological Surveys & Salvage, Walhallow LALC - BBS survey team		Permits				

** Site Status

Valid - The site has been recorded and accepted onto the system as valid
Destroyed - The site has been completely impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There is nothing left of the site on the ground but proponents should proceed with caution.
Partially Destroyed - The site has been only partially impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There might be parts or sections of the original site still present on the ground
Not a site - The site has been originally entered and accepted onto AHIMS as a valid site but after further investigations it was decided it is NOT an aboriginal site. Impact of this type of site does not require permit but Heritage NSW should be notified

Report generated by AHIMS Web Service on 13/01/2026 for Stephanie Rusden for the following area at Datum :GDA, Zone : 56, Eastings : 260449.0 - 280449.0, Northings : 6485888.0 - 6505888.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 4

This information is not guaranteed to be free from error omission. Heritage NSW and its employees disclaim liability for any act done or omission made on the information and consequences of such acts or omission.

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APPENDIX 2: UNANTICIPATED FINDS PROTOCOL

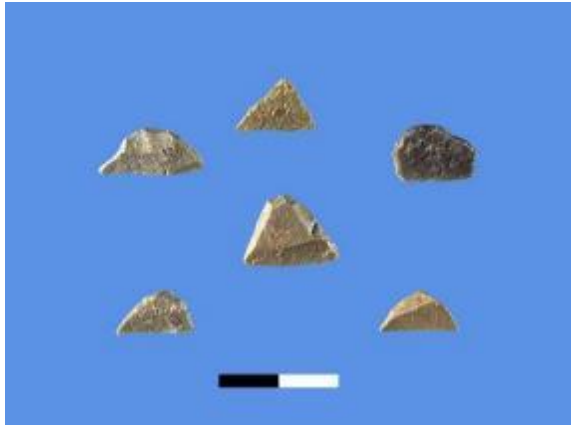
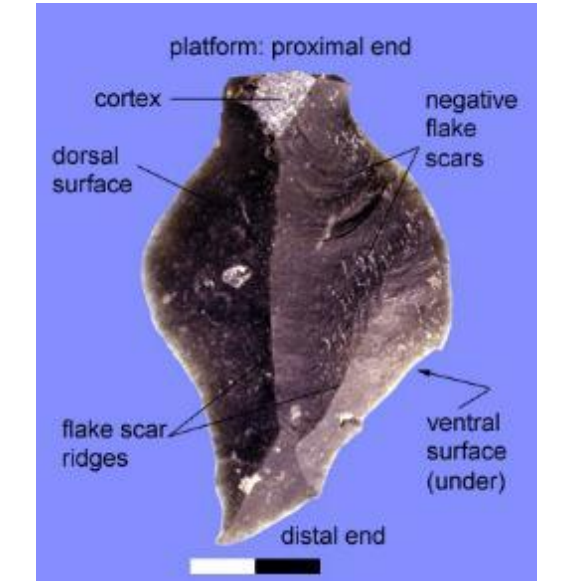
An Aboriginal artefact is anything which is the result of past Aboriginal activity. This includes stone (artefacts, rock engravings etc.), plant (culturally scarred trees) and animal (if showing signs of modification; i.e. smoothing, use). Human bone (skeletal) remains may also be uncovered while onsite.

Cultural heritage significance is assessed by the Aboriginal community and is typically based on traditional and contemporary lore, spiritual values, and oral history, and may also consider scientific and educational value.

Protocol to be followed if previously unrecorded or unanticipated Aboriginal object(s) are encountered:

1. If any Aboriginal object is discovered and/or harmed in, or under the land, while undertaking the proposed development activities, the proponent must:
 - a. Not further harm the object
 - b. Immediately cease all work at the particular location
 - c. Secure the area to avoid further harm to the Aboriginal object
 - d. Notify Enviro Line (131 555; info@environment.nsw.gov.au) as soon as practical, providing any details of the Aboriginal object and its location; and
 - e. Not recommence any work at the particular location unless authorised in writing by Heritage NSW.
2. If Aboriginal burials are unexpectedly encountered during the activity, work must stop immediately, the area secured to prevent unauthorised access. NSW Police should be contacted immediately, and the find reported to Enviro Line and Heritage NSW.
3. Cooperate with the appropriate authorities and relevant Aboriginal community representatives to facilitate:
 - a. The recording and assessment of the find(s)
 - b. The fulfilment of any legal constraints arising from the find(s), including complying with Heritage NSW directions
 - c. The development and implementation of appropriate management strategies, including consultation with stakeholders and the assessment of the significance of the find(s).
4. Where the find(s) are determined to be Aboriginal object(s), recommencement of work in the area of the find(s) can only occur in accordance with any consequential legal requirements and after gaining written approval from Heritage NSW (normally an Aboriginal Heritage Impact Permit).

APPENDIX 3: ARTEFACT IDENTIFICATION

	
A retouched silcrete flake	A quartz flake
	
Microliths (scale = 1 cm)	Volcanic flakes
	
Flake characteristics (scale = 1 cm)	A mudstone/tuff core from which flakes have been removed