



# Keyhole Lands, Horsley Park: Aboriginal Cultural Heritage Assessment

FINAL REPORT

Prepared for Frasers Property Industrial

17 December 2021

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- Caitlin McManus (Archaeological survey).
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# Contents

<b>Glossary.....</b>	<b>v</b>
<b>Summary .....</b>	<b>vi</b>
<b>1 Introduction .....</b>	<b>1</b>
1.1 Project background .....	1
1.2 Study area.....	1
1.3 Proposed development.....	2
1.4 Planning approvals .....	2
1.5 Restricted and confidential information.....	3
1.6 Aboriginal cultural heritage .....	3
1.6.1 General description .....	3
1.6.2 Tangible Aboriginal cultural heritage.....	3
1.6.3 Intangible Aboriginal cultural heritage .....	4
1.6.4 Statutory.....	4
1.6.5 Values.....	4
<b>2 Study area context.....</b>	<b>8</b>
2.1 Topography and hydrology .....	8
2.2 Soil landscapes .....	9
2.3 Climate and rainfall .....	10
2.4 Landscape resources .....	10
2.5 European land use history.....	11
<b>3 Aboriginal cultural heritage context .....</b>	<b>18</b>
3.1 Ethnohistory.....	18
3.2 Aboriginal heritage located in the study area .....	19
3.3 Interpretation of past Aboriginal land use .....	20
<b>4 Aboriginal community consultation.....</b>	<b>24</b>
4.1 Stage 1: Notification of project proposal and registration of interest .....	24
4.1.1 Identification of relevant Aboriginal stakeholders.....	24
4.1.2 Public notice .....	25
4.1.3 Registration of Aboriginal parties .....	25
4.2 Stage 2: Presentation of information about the proposed project.....	26
4.3 Stage 3: Gathering information about cultural significance.....	27
4.3.1 Archaeological assessment methodology information pack.....	27
4.3.2 Information gathered during fieldwork .....	27
4.4 Stage 4: Review of draft ACHA report.....	28
<b>5 Aboriginal cultural significance assessment.....</b>	<b>29</b>
5.1 Introduction to the assessment process.....	29
5.2 Cultural (social significance) values.....	30

5.3	Historic values.....	31
5.4	Archaeological (scientific significance) values.....	31
5.5	Aesthetic values.....	31
5.6	Statement of significance.....	31
5.6.1	Statement of significance for AHIMS 45-5-3082/Horsley Dr PAD .....	31
<b>6</b>	<b>Development limitations and mitigation measures.....</b>	<b>33</b>
6.1	Potential risks to Aboriginal cultural heritage .....	33
6.2	Avoiding harm to Aboriginal heritage .....	33
6.3	Management and mitigation measures .....	33
<b>7</b>	<b>Recommendations .....</b>	<b>36</b>
	<b>References.....</b>	<b>38</b>
	<b>Appendices .....</b>	<b>39</b>
<b>Appendix 1</b>	<b>Consultation log .....</b>	<b>40</b>
<b>Appendix 2</b>	<b>Stage 1: Notification of project proposal and registration of interest .....</b>	<b>53</b>
<b>Appendix 3</b>	<b>Stage 2 and 3: Presentation of information about the proposed project and Gathering information about cultural significance.....</b>	<b>54</b>
<b>Appendix 4</b>	<b>Stage 4: Review of draft cultural heritage assessment report .....</b>	<b>55</b>
<b>Appendix 5</b>	<b>Archaeological Report .....</b>	<b>56</b>

## Tables

Table 1	List of registered Aboriginal parties and group contact .....	vi
Table 2	Site details.....	viii
Table 3	Study area – Keyhole Lands.....	1
Table 4	List of registered Aboriginal parties .....	26
Table 5	Significance assessment criteria .....	32
Table 6	Summary of potential archaeological impact .....	33

## Figures

Figure 1	Location of the study area .....	5
Figure 2	Study area detail .....	6
Figure 3	Proposed works .....	7
Figure 4	AHIMS records near the study area .....	22
Figure 5	Survey results .....	23
Figure 6	Impact assessment .....	35



## Photos

Photo 1	Diagram showing Strahler stream order (Ritter et al. 1995, pp. 151).....	9
Photo 2	Aerial photograph dated to 1930 with the study area outlined in red (Source: NSW Spatial Services 2021).....	13
Photo 3	Aerial photograph dated to 1961 with the study area outlined in red (Source: NSW Spatial Services 2021).....	14
Photo 4	Aerial photograph dated to 1978 with the study area outlined in red (Source: NSW Spatial Services 2021).....	15
Photo 5	Aerial photograph dated to 1994 with the study area outlined in red (Source: NSW Spatial Services) .....	16
Photo 6	Aerial photograph dated to 2005 with the study area outlined in red (Source: NSW Spatial Services 2021).....	17

## Glossary

<b>ACHA</b>	Aboriginal Cultural Heritage Assessment
<b>AR</b>	Archaeological Report
<b>AHIMS</b>	Aboriginal Heritage Information Management System
<b>Biosis</b>	Biosis Pty Ltd
<b>CBD</b>	central business district
<b>Consultation requirements</b>	<i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i>
<b>DA</b>	Determining Authority
<b>DCP</b>	Development Control Plan
<b>DECCW</b>	Department of Environment, Climate Change and Water (now Heritage NSW)
<b>DP</b>	Deposited Plan
<b>EP&amp;A Act</b>	<i>Environmental Planning and Assessment Act 1979</i>
<b>GDA</b>	Geocentric Datum of Australia
<b>GSV</b>	Ground Surface Visibility
<b>Heritage Act</b>	<i>NSW Heritage Act 1977</i>
<b>Heritage NSW</b>	Heritage NSW, Department of Premier and Cabinet (DPC)
<b>ICOMOS</b>	International Council on Monuments and Sites
<b>LALC</b>	Local Aboriginal Land Council
<b>LEP</b>	Local Environmental Plan
<b>LGA</b>	Local Government Area
<b>MGA</b>	Map Grid of Australia
<b>NHL</b>	National Heritage List
<b>NNTT</b>	National Native Title Tribunal
<b>NPW Act</b>	<i>National Parks and Wildlife Act 1974</i>
<b>NPWS</b>	National Parks and Wildlife Service
<b>NSW</b>	New South Wales
<b>NTSCORP</b>	Native Title Services Corporation
<b>PAD</b>	Potential Archaeological Deposit
<b>RAP</b>	Registered Aboriginal Party
<b>SEPP</b>	State Environmental Planning Policy
<b>the Code</b>	<i>Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW</i>

## Summary

Biosis Pty Ltd (Biosis) was commissioned by Frasers Property Industrial to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed land rezoning of the Keyhole Lands (the study area) (Figure 1, Figure 2, Figure 3). The study area is located in privately owned land approximately 31 kilometres west of the Sydney central business district (CBD).

The project will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Fairfield City Council is the Determining Authority (DA) and will assess the Planning Proposal to be prepared by Frasers Property Industrial to allow for the rezoning of the study area.

Biosis has provided an interim Archaeological Report (AR) which was submitted as part of the initial planning proposal to Fairfield City Council. Fairfield City Council provided feedback on the planning proposal which included comments on the AR. Since the comments were received, an additional site survey was undertaken in accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010b) (the Code). Deerubbin Local Aboriginal Land Council (LALC) was present at this additional site survey. The AR attached to this ACHA includes all information from the multiple site surveys. The ACHA and AR cover all comments raised from Fairfield City Council, where the requested tasks were not able to be completed at this stage they have been included as recommendations.

### Consultation

The Aboriginal community was consulted regarding the heritage management of the project throughout its lifespan. Consultation has been undertaken as per the process outlined in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a) (consultation requirements). The appropriate government bodies were notified and an advertisement placed in the Fairfield Champion newspaper (14 July 2021).

Office of the Registrar, *Aboriginal Land Rights Act 1983* did not provide a response of listed Aboriginal Owners with land within the study area. A search conducted by the National Native Title Tribunal (NNTT) listed no Registered Native Title Claims, Unregistered Claimant Applications or Registered Indigenous Land Use Agreements within the study area. Heritage NSW, Department of Premier and Cabinet (heritage NSW) provided a list of Aboriginal stakeholders within the Fairfield Local Government Area (LGA), which resulted in the following Aboriginal organisations registering their interest (Table 1):

**Table 1 List of registered Aboriginal parties and group contact**

No.	Organisation	Contact person
1	A1 Indigenous Services	Carolyn Hickey
2	Aragung Aboriginal Cultural Heritage Site Assessments	Jamie Eastwood
3	Barraby Cultural Services	Lee Field
4	Butucarbin Aboriginal Corporation	Jennifer Beale
5	Confidential party no.1	N/A
6	Darug Custodian Aboriginal Corporation	Justine Coplin
7	Didge Ngunawal Clan	Lillie Carrol and Paul Boyd
8	Goobah Developments	Basil Smith

No.	Organisation	Contact person
9	Goodradigbee Cultural & Heritage Aboriginal Corporation,	Caine Carroll
10	Guntawang Aboriginal Resources Incorporated	Wendy Morgan
11	Kamilaroi Yankuntjatjara Working Group	Phil Khan
12	Murra Bidgee Mullangari Aboriginal Corporation	Darleen and Ryan Johnson
13	Confidential party no.2	N/A
14	Tocomwall	Scott Franks
15	Waawaar Awaa Aboriginal Corporation	Rodney and Barry Gunther
16	Widescope Indigenous Group	Steven and Donna Hickey
17	Yurrandaali	Bo Field
18	Deerubbin Local Aboriginal Land Council	Steven Randall

Two Aboriginal groups requested that their details be kept confidential. Upon registration, the Aboriginal parties were invited to provide their knowledge on the study area and on the proposal provided in the Methodology. Responses from the registered Aboriginal parties (RAPs) are included in Appendix 3.

A site officer from Deerubbin Local Aboriginal Land Council (LALC) participated in the field investigation. Biosis has requested comment from the LALC on the result of the field investigation. This has yet to be received. Once it is received it will be added to this document and appendices.

The outcome of the consultation process was that the RAPs considered the study area to have a high level of cultural significance. Kamilaroi-Yankuntjatjara Working Group stated:

*"The study area is highly significant to us Aboriginal people we utilised these water ways to the full potential, and they are sacred to us".*

Kamilaroi Yankuntjatjara Working Group also provided the following recommendation:

*"We would like to recommend a cultural interpretation plan for this project to educate the wider community and continuing the passing down of knowledge to our younger generations. This can be achieved through native landscaping, edible gardens, art, digital displays, sound scape, water features, with in your design and much more."*

The results of the consultation process are included in this document. The recommendations that resulted from the consultation process are provided below.

## Results

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

- Artefact sites and PADs are the most commonly occurring Aboriginal site type within the local region.
- Higher density Aboriginal sites are more likely to be found in association with second order or higher creek lines which provide a more reliable source of fresh water and resources.
- A review of the historical land use of the study area shows that portions of the site have undergone disturbances which could have destroyed or disturbed archaeological deposits.

- Previous archaeological excavations in the vicinity of the study area have confirmed that the Blacktown soil landscape can contain intact archaeological sites. The Blacktown soil landscape is residual in nature and has reasonable potential to preserve archaeological deposits in an open context.

An extensive search of the Aboriginal Heritage Information Management System (AHIMS) database was conducted on 16 March 2021 (Client service ID: 576371). The search identified 103 Aboriginal archaeological sites within a 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082/Horsley Dr PAD) was identified within the study area. AHIMS 45-5-3082/Horsley Dr PAD consists of an area of Potential Archaeological Deposit (PAD) which will have the potential to be impacted by the future development of the site (Table 2).

An archaeological survey was conducted on 5 April 2021 within the following lots; 58A, 58B, and 79B DP 17288, A and B DP 361393, 59A DP362022, 81A and 81B DP 348110, and part of Lot 1 DP849699. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover.

An additional archaeological survey was undertaken on 14 September 2021 within the following lots: 56 and 57 DP 13961, B DP 357890, 1 and 2 DP 505934, A DP 347034, 78B DP 347873, 1 DP849699, B DP 377249, and 61B, 74A, and 79A DP 17288 when further lots were accessible.

The overall effectiveness of each of the surveys for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting ground surface visibility (GSV) combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made within the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082/Horsley Dr PAD upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

There is potential for future development activities to impact upon AHIMS 45-5-3082/Horsley Dr PAD and the identified areas of moderate and high archaeological potential.

**Table 2 Site details**

Site name	Site type	Significance	Type of harm before mitigated	Consequence of unmitigated harm	Consequence of mitigated harm	Site specific recommendations
<b>AHIMS 45-5-3082/Horsley Dr PAD</b>	PAD	Unknown	Direct	Total	Total loss of value	Should be avoided. If unable to be avoided test excavations will be required prior to development.

## Management recommendations

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

### Recommendation 1: Further archaeological survey of remaining portions of the study area

Biosis recommends that a comprehensive archaeological survey of the entire study area be undertaken to inform this assessment. It is recommended that portions of the site which were not investigated as part of the



archaeological survey completed by Biosis on 5 April 2021 and 14 September 2021 (refer to Table 3), should be surveyed. Further archaeological surveys should be undertaken in accordance with the Code

### **Recommendation 2: Avoidance of AHIMS 45-5-3082/Horsley Dr PAD and areas identified as having moderate/high archaeological potential**

Biosis recommends that avoidance of AHIMS 45-5-3082/Horsley Dr PAD and areas identified as having moderate/high archaeological potential should be undertaken wherever possible through redesign (Table 6). If impacts to AHIMS 45-5-3082/Horsley Dr PAD and areas of moderate/high archaeological potential cannot be avoided Recommendation 3 must be undertaken prior to undertaking any works on site.

### **Recommendation 3: Test excavations**

Based on current development plans it is unlikely that AHIMS 45-5-3082/Horsley Dr PAD and areas identified as having moderate/high archaeological potential can be avoided. If impacts cannot be avoided through redesign, further investigation in the form of test excavations is recommended. Test excavations should be undertaken in accordance with the Code. This would also include any additional areas of moderate or high potential identified through the comprehensive archaeological survey as outlined in Recommendation 1.

### **Recommendation 4: Areas identified as having low archaeological potential**

No further investigations are required for areas assessed as having low archaeological potential. This recommendation is conditional upon Recommendations 7, 8, and 9.

### **Recommendation 5: Consultation with the registered Aboriginal parties**

It is recommended that consultation with RAPs be undertaken in accordance with the consultation requirements, as part of the ACHA currently being prepared by Biosis. The proponent should inform RAPs about the project and future development. RAPs should be given the opportunity to provide information regarding the cultural significance of the study area, and to provide comment on the management of Aboriginal cultural heritage values within the study area throughout the life of the project.

### **Recommendation 6: Updates to AR and ACHA**

Biosis recommends that following the completion of further investigations and consultation with RAPs that the AR and ACHA be updated and finalised.

### **Recommendation 7: Heritage interpretation strategy**

The Horsley Park area has a rich Aboriginal history and it is recommended that opportunities for heritage interpretation are explored and implemented for the project in consultation with Aboriginal stakeholders. The purpose of the strategy is to ensure that the traditional, historical and contemporary cultural values and meanings held by Aboriginal people of the region are indelibly integrated into the Keyhole Lands project in a meaningful, culturally appropriate and practical way.

### **Recommendation 8: Discovery of unanticipated Historical relics**

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

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### **Recommendation9: Discovery of unanticipated Aboriginal objects**

All Aboriginal objects and Places are protected under the *National Parks and Wildlife Act 1974* (NPW Act). It is an offence to disturb an Aboriginal site or object without a consent permit issued by Heritage NSW. Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying the Heritage NSW and Aboriginal stakeholders.

### **Recommendation 10: Discovery of human remains**

Human remains may be found in a variety of landscapes in NSW, including middens and sandy or soft sedimentary soils. If any suspected human remains are discovered during any activity you must:

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

# 1 Introduction

## 1.1 Project background

Biosis has been commissioned by Frasers Property Industrial to undertake ACHA for the land rezoning of the Keyhole Lands (refer to **Error! Reference source not found.**, **Error! Reference source not found.**, and Table 3), at Horsley Park, NSW (the study area).

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

The project will be assessed under Part 3 of the EP&A Act. Fairfield City Council is the DA and will assess the Planning Proposal to be prepared by Frasers Property Industrial to allow for the rezoning of the study area.

## 1.2 Study area

The study area is located approximately 14 kilometres south west of Parramatta and approximately 31 kilometres west of the Sydney CBD (**Error! Reference source not found.**). It encompasses approximately 64 hectares of private land and consists of the lots outlined below in Table 3.

The study area is within the:

- Fairfield LGA.
- Parish of Melville.
- County of Cumberland.

**Table 3 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address	Status of site access
58B	17288	211-217 Chandos Road, Horsley Park	Accessible
58A	17288	203-209 Chandos Road, Horsley Park	Accessible
57	13961	187-201 Chandos Road, Horsley Park	Accessible
56	13961	171-185 Chandos Road, Horsley Park	Accessible
A	361393	155-169 Chandos Road, Horsley Park	Accessible
B	361393	137-153 Chandos Road, Horsley Park	Accessible
54	13961	121-135 Chandos Road, Horsley Park	No access
59B	362022	143-155 Redmayne Road, Horsley Park	No access
59A	362022	157-165 Redmayne Road, Horsley Park	Accessible
1	505934	167-183 Redmayne Road, Horsley Park	Accessible
2	505934	185-193 Redmayne Road, Horsley Park	Accessible
61B	17288	195 Redmayne Road, Horsley Park	Accessible

Lot No.	Deposited Plan	Address	Status of site access
A	347034	203-210 Redmayne Road, Horsley Park	Accessible
B	347034	215-223 Redmayne Road, Horsley Park	No access
63	13961	225-245 Redmayne Road, Horsley Park	No access
77	13961	120-134 Redmayne Road, Horsley Park	No access
B	357890	136-142 Redmayne Road, Horsley Park	Accessible
A	357890	144-150 Redmayne Road, Horsley Park	No access
A	377249	172-180 Redmayne Road, Horsley Park	No access
B	377249	152-170 Redmayne Road, Horsley Park	Accessible
74B	17288	182-190 Redmayne Road, Horsley Park	No access
74A	17288	200-206 Redmayne Road, Horsley Park	Accessible
78B	347873	1671-1675 The Horsley Drive, Horsley Park	Accessible
79A	17288	1667 The Horsley Drive, Horsley Park	Accessible
79B	17288	1657-1665 The Horsley Drive, Horsley Park	Accessible
1	849699	1637-1645 The Horsley Drive, Horsley Park	Accessible
81A	348110	1627-1635 The Horsley Drive, Horsley Park	Accessible
81B	348110	1617-1625 The Horsley Drive, Horsley Park	Accessible
C	398446	1681 The Horsley Drive, Horsley Park	No access
D	398446	1677-1679 The Horsley Drive, Horsley Park	No access
A	394855	220 Redmayne Road, Horsley Park	No access
B	394855	222-230 Redmayne Road, Horsley Park	No access

### 1.3 Proposed development

Frasers Property Industrial are preparing a Planning Proposal which will propose the following amendments to the *Fairfield Local Environmental Plan 2013* (LEP) :

- Rezone the study area from RU2 Rural Landscape to IN1 General Industrial.
- Amend the Height of Buildings Map to remove the building height limit applicable to the study area.
- Amend the Minimum Lot Size Map to reduce the minimum subdivision lot size.

The proposed amendments to the LEP seek to support the future development of a Warehouse, Logistics and Industrial Facilities Hub within the study area (Figure 1).

### 1.4 Planning approvals

The proposed development will be assessed against Part 3 of the EP&A Act. Other relevant legislation and planning instruments that will inform this assessment include:

- *Environment Protection and Biodiversity Conservation Act 1999*.

- *National Parks and Wildlife Act 1974* (NPW Act).
- *National Parks and Wildlife Amendment Act 2010*.
- Infrastructure State Environmental Planning Policy (SEPP) 2007.
- Fairfield LEP.
- *Fairfield Development Control Plan 2013* (DCP).

## **1.5 Restricted and confidential information**

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

Several registered RAPs have requested to remain anonymous, they have been labelled 'Confidential Party no. 1' and Confidential Party no. 2' throughout this document.

## **1.6 Aboriginal cultural heritage**

### **1.6.1 General description**

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

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

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

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

### **1.6.2 Tangible Aboriginal cultural heritage**

Three categories of tangible Aboriginal cultural heritage may be defined:

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



### 1.6.3 Intangible Aboriginal cultural heritage

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

### 1.6.4 Statutory

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

Aboriginal objects are defined as:

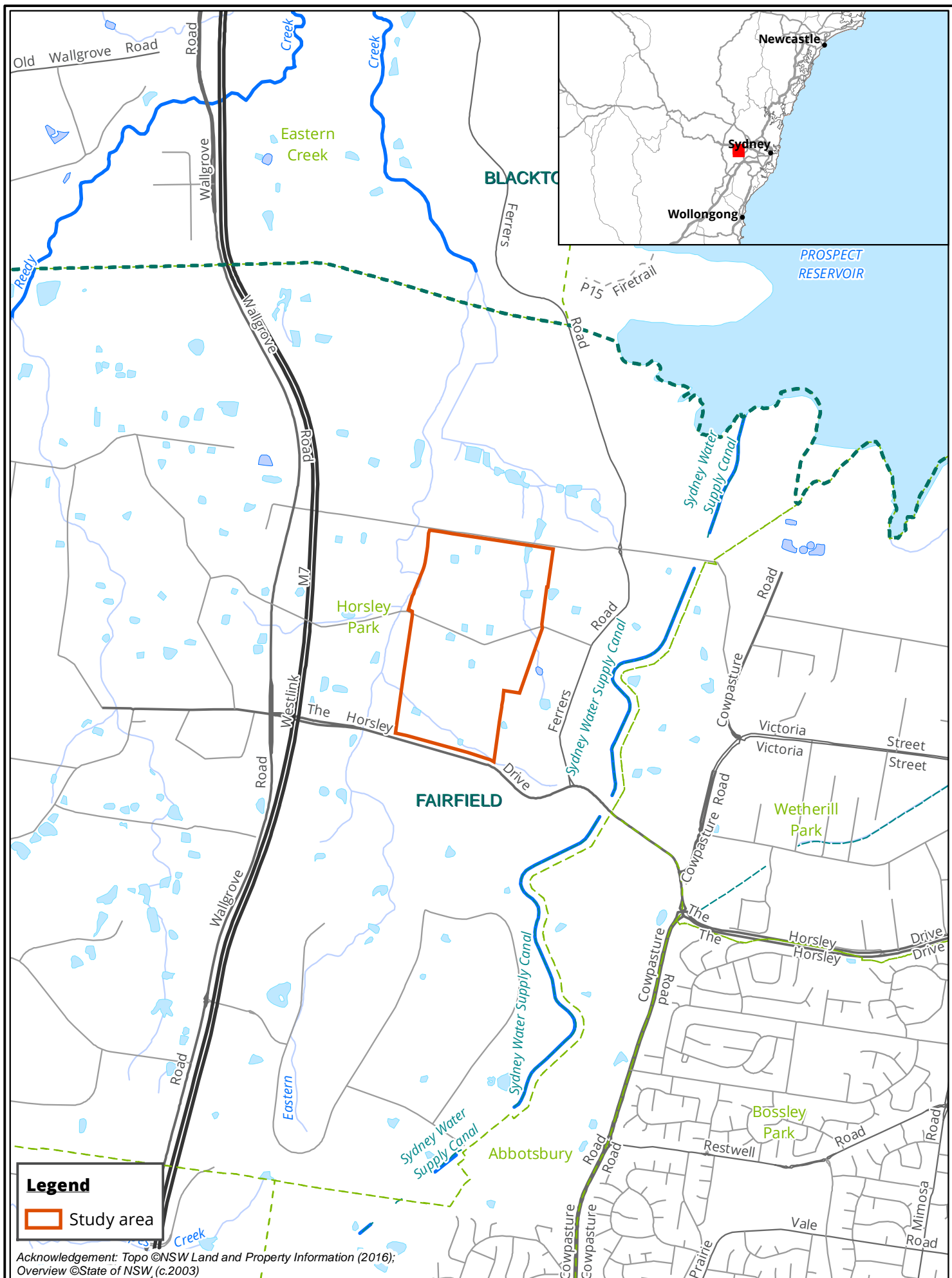
*any deposit, object or material evidence...relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains*

Aboriginal places are defined as a place that is or was of special Aboriginal cultural significance. Places are declared under section 84 of the NPW Act.

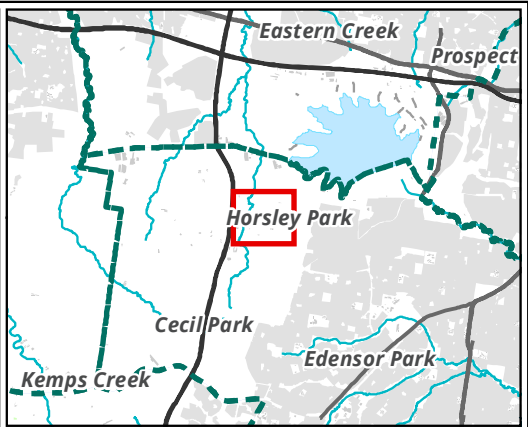
### 1.6.5 Values

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



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



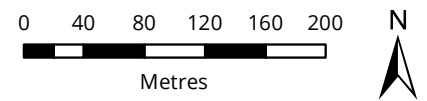




**Legend**

-  Study area
-  Lot

**Figure 2 Study area detail**

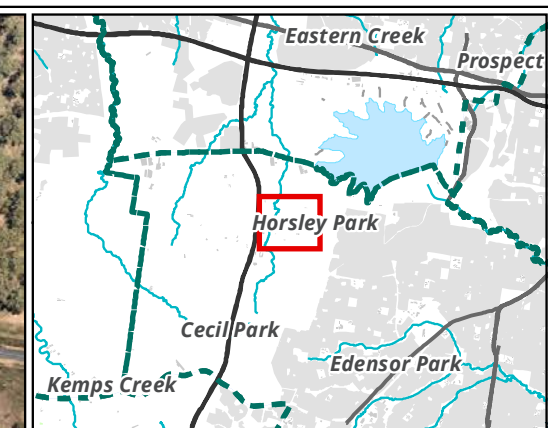
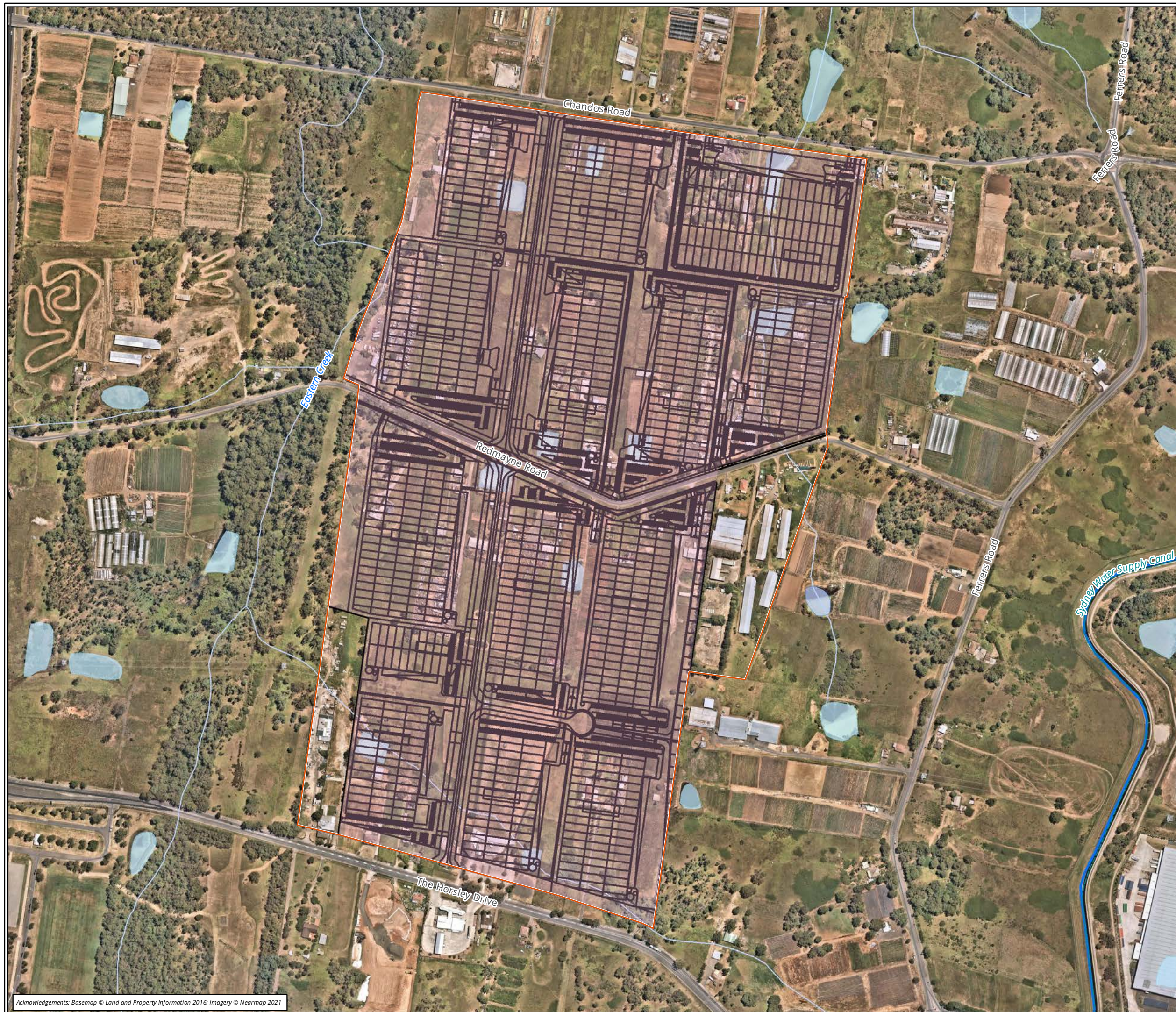


Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



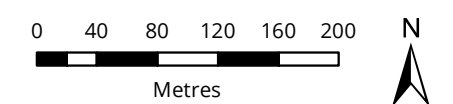
Matter: 34802,  
Date: 28 May 2021,  
Checked by: AKE, Drawn by: LH, Last edited by: amackegard  
Location: P:\34800s\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd





- Legend**
- Study area
  - Draft Master Plan - future development
  - Rezone to IN1 General Industrial

**Figure 3 Proposed works**



Scale: 1:5,000 @ A3  
 Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
 Date: 31 May 2021,  
 Checked by: AKE, Drawn by: AM, Last edited by: amackegard  
 Location: P:\34800s\34802\Mapping\34802\_ADDA\_F3\_PropDev.mxd



## 2 Study area context

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

### 2.1 Topography and hydrology

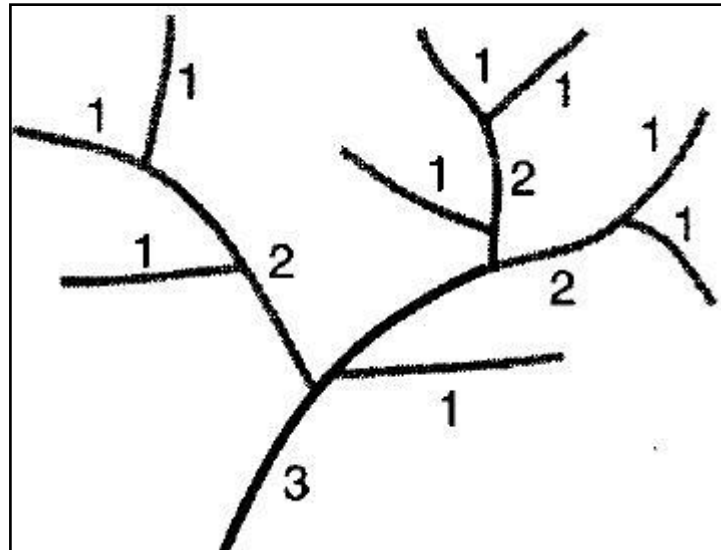
The study area is located within the Cumberland Lowlands physiographic region, situated on the Bringelly Shale formation which is part of the Wianamatta group geological unit. The Bringelly Shale formation consists of shale (claystone and siltstone), carbonaceous claystone, laminate and fine to medium-grained lithic sandstone (Bannerman & Hazelton 1990, p.3). Aboriginal artefact scatter sites are common across the Bringelly Shale formation, as are PADs. The presence of underlying shale deposits suggests that sites commonly found within sandstone formations, such as grinding grooves and rock shelters/rock art, are less likely to be present.

The Bringelly Shale unit comprises of low lying, gently undulating plains and low hills, with a dense drainage net of predominantly northward flowing channels (Bannerman & Hazelton 1990, p.2). The topography of the study area consists of moderate to gentle slopes which radiate from the south of the study area towards the west from a crest. In the north-east portion of the study area, a low lying crest forms a very gentle simple slope. Narrow ridgelines, hillcrests and valleys are also present within the surrounding landscape.

Hydrology within the study area includes two first order non-perennial drainage lines running through the study area, one running parallel to the southern limit and one from Redmayne Road to Chandos Road in the south-eastern portion, and Eastern Creek which runs adjacent to and briefly intersects the western boundary of the study area. Stream order is recognised as a factor which assists the development of predictive modelling in Sydney Basin Aboriginal archaeology, and has seen extensive use in predictive modelling for the Sydney region, most notably by Jo McDonald Cultural Heritage Management (JMCHM) (JMCHM 2000, JMCHM 2005a, JMCHM 2005b, JMCHM 2008). These predictive models have a tendency to favour higher order streams as the locations of campsites and therefore archaeological remains. Larger water sources would have been more likely to provide a stable source of water and by extension other resources which would have been used by Aboriginal groups.

The stream order system used for this assessment was originally developed by Strahler (1952). It functions by adding two streams of equal order at their confluence to form a higher order stream, as shown in Photo 1. As stream order increases, so does the likelihood that the stream would be a perennial source of water.





**Photo 1** Diagram showing Strahler stream order (Ritter et al. 1995, pp. 151).

The first order drainage line in the southern portion of the study area is a tributary of Eastern Creek, a second order non-perennial water course, which runs parallel to and briefly enters the western limit of the study area. Eastern Creek enters the study area bounds just north of Redmayne Road as a second order non-perennial water course. The other first order non-perennial drainage line running from Redmayne Road to Chandos Road is a tributary to the second order unnamed non-perennial drainage line to the north of the study area. Both of the first order drainage lines that run through the study area are tributaries of the closest permanent water source to the site, Eastern Creek. Approximately 3.1 kilometres to the north of the study area Eastern Creek becomes a third order stream and a permanent water source. The proximity of a number of water courses to the study area is considered a positive indicator for Aboriginal sites to be present.

## 2.2 Soil landscapes

Soil landscapes have distinct morphological and topological characteristics that result in specific archaeological potential. They are defined by a combination of soils, topography, vegetation and weathering conditions. Soil landscapes are essentially terrain units that provide a useful way to summarise archaeological potential and exposure. Two soil landscapes are present within the study area; the Blacktown and Luddenham soil landscapes.

The northern and western portions of the study area are located within the Blacktown soil landscape. The Blacktown soil landscape is a residual soil landscape and consists of gently undulating rises, broad rounded crests and gently inclined slopes with a gradient of less than 5%. Local relief within the Blacktown soil landscape is up to 30 metres and rocky outcropping is absent. Dominant soils consist of shallow to moderately deep (<100 centimetres) red and brown podzols on crests and in well drained topographies, and deep (150-300 centimetres) yellow podzolic soils and soloths on lower slopes and drainage channels. The soils can be hard setting with moderate erodability (Bannerman & Hazelton 1990, p.28).

Residual soils form from the in-situ weathering of bedrock material, resulting in slow accumulation of soils over long periods of time. Due to their age and slow accumulation, residual soil landscapes have reasonable potential to preserve archaeological deposits in an open context, such as stone artefacts derived from occupation sites. However, this slow accumulation when combined with extensive land clearing and land use (usually associated with pastoral and civic development) will result in an increased likelihood that soils will have been disturbed. This results in poor preservation of archaeological material in these locations.

The Luddenham soil landscape is located within the south western portion of the study area. It is characterised as an erosional soil landscape with a local relief of 50 to 80 metres and slopes of 5 to 20%. Shallow (< 100 centimetres) dark podzolic soils or massive earthy clays area located upon crests, while moderately deep (70 – 150 centimetres) yellow podzolic soils and prairie soils can be found in drainage lines. This soil landscape is impacted by high soil erosion. Moderate sheet erosion also occurs within areas of existing disturbance, particularly in cultivated lands where sheet erosion can become severe due to overgrazing (Bannerman & Hazelton 1990, pp.63–64).

Erosional soils are generally subject to movement of shallow soils, which can result in poor preservation of the archaeological record. Dispersed sandy soils of sandstone bedrock and loose quartz sandy loam, and earthy clayey sands, which occur as A1 and B horizons, have a low erosion potential. However, when cleared of vegetation, the soils can be subject to high levels of erosion. As this soil landscape is characterised as highly erosional, the soils can be shallow and highly permeable, as well as producing low soil fertility. This would indicate that the presence of Aboriginal sites and objects may be unlikely where erosion has occurred (Chapman et al. 2009, pp.64–67, McInnes 1997, p.45, cited by Umwelt (Australia) Pty Limited 2016, p.13).

## 2.3 Climate and rainfall

Climate data was provided by the Horsley Park Equestrian Centre AWS weather station approximately 7.4 kilometres away (Station No. 067119).

- The mean maximum average temperature is highest in January when it reaches 30.1 degrees.
- The lowest mean maximum temperature is in July at 17.4 degrees.
- The mean minimum temperature is highest in January at 17.4 degrees and lowest in July at 5.8 degrees.
- The average rainfall is highest in February at 118.3 millimetres and lowest in July at 10.3 millimetres.

Because the study area contains three non-perennial drainage lines which do not carry water all year round, it is likely the study area was occupied most frequently in January and February as the higher average rainfall during these months. However, changes in climate over time may have affected Aboriginal occupation patterns across the study area.

## 2.4 Landscape resources

The wider region includes distinct ecological zones, including open forest and open woodland, with riparian vegetation extending along many of the watercourses. Each ecological zone hosts a different array of floral and faunal species, many of which would have been utilised according to seasonal availability. Aboriginal inhabitants of the region would have had access to a wide range of avian, terrestrial and aquatic fauna and repeated firing of the vegetation would have opened up the foliage allowing ease of access through and between different resource zones.

Within the Cumberland subregion of the Sydney Basin Bioregion a variety of vegetation types are present, with Grey Box *Eucalyptus microcarpa*, Forest Red Gum *Eucalyptus tereticornis*, Narrow-leaved Ironbark *Eucalyptus crebra* woodland, and Spotted Gum *Corymbia maculata* are present on shale hills. Hard-Leaved Scribbly Gum *Eucalyptus sclerophylla*, Rough-Barked Apple *Angophora floribunda*, and Old Man Banksia *Banksia serrata* are identified on alluvial sands and gravels. Broad-Leaved Apple *Angophora subvelutina*, Cabbage Gum *Eucalyptus amplifolia*, Forest Red Gum *Eucalyptus tereticornis*, and Swamp Oak *Casuarina glauca* are present on river flats. Tall Spike Rush *Eleocharis sphacelata*, and Juncus *Juncus effusus* with Parramatta Red Gum *Eucalyptus parramattensis* noted around lagoons and swamps (NPWS 2003, p.193).

The Blacktown soil landscape typically supports dry sclerophyll forest; predominantly species of eucalypt, including Forest Red Gum *Eucalyptus tereticornis*, Narrow Leaved Ironbark *Eucalyptus crebra*, and Grey Box *Eucalyptus moluccana* (Bannerman & Hazelton 1990, p.29). Broad Leaved Ironbark *Eucalyptus fibrosa* and White Stringy Bark *Eucalyptus globoidea* are also occasionally present.

The type of vegetation found within the Luddenham soil landscape includes extensively cleared open dry sclerophyll forest (Bannerman & Hazelton 1990, p.64). The dominant tree species include Spotted Gum *Eucalyptus maculata* and Grey Box *E. moluccana*. Broad-leaved Iron Bark *E. fibrosa*, Narrow Leaved Ironbark *E. crebra*, Forest Red Gum *E. tereticornis* and Woollybutt *E. longifolia* are also present. The understory shrub species include Blackthorn *Bursaria spinosa*, Coffee Bush *Breynia oblongifolia*, Forest Oak *Alocasuarina torulosa*, Hickory *Acacia implexa* and *Clerodendrum tomentosum*. While common grasses include Speargrass *Aristida vagans*, Bordered Panic Grass *Entolasia marginata* and Paddock Lovegrass *Theineta australis* (Bannerman & Hazelton 1990, p.64).

Common tree species include Broad-leaved Apple *Angophora subvelutina*, Cabbage Gum *Eucalyptus amplifolia* and Swamp Oak *Casuarina glauca*. On elevated stream banks a tall shrubland of Paperbark *Melaleuca spp.* and Tea Tree *Leptospernu spp.* may occur.

Plant resources were used in a variety of ways. Fibres were twisted into string, which was used for many purposes, including the weaving of nets, baskets and fishing lines. String was also used for personal adornment. Bark was used in the provision of shelter; a large sheet of bark being propped against a stick to form a gunyah (Attenbrow 2002).

Native fauna that would have been present in the vicinity of the study area include: Australian Wood Duck *Chenonetta jubata*, White-Faced Heron *Egretta novaehollandiae*, Eastern Long-Necked Tortoise *Chelodina longicollis*, Eastern Water Skink *Eulamprus quoyii*, Garden Skink *Lampropholis guichenoti*, Welcome Swallow *Hirundo neoxena*, Western Swampphen *Porphyrio porphyrio*, as well as arboreal fauna including owls *Strigiformes*, Ringtailed Possum *Pseudocheirus peregrinus* and Brushtailed Possums *Trichosrus vulpecula*, and gliders *Petauridae*.

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

## 2.5 European land use history

The earliest exploration of the Penrith region was led by Captain Watkin Tench, an officer in the Marine Corps, accompanied by Mr Lowe (surgeon's mate of the *Sirius*), Mr Arndell (assistant surgeon to the Colony), two other marines, and a convict, in 1789. The group reached the Nepean River on 28 June (Paul Davies Pty Ltd 2007, 11). Later that year, the Penrith Ford was crossed, and in 1791 the course of the Nepean had been explored from the ford to Grose River. By 1791, it had been confirmed that the Hawkesbury and Nepean rivers were the same watercourse; however, each of the names were kept, transitioning from one to the other at the junction with the Grose River (Thorp 1986, 12). From 1803, Charles Grimes and James Meehan surveyed areas of the eastern bank of the Nepean following the sanctioning of settlement in this area by Governor Philip Gidley King, likely in part for the fertile soils associated with the Nepean River floodplain. The portions of land ranged from 40 to 200 acres (approximately 16.2 to 81 hectares), with several of 1,000 acres (404.6 hectares) and above. These were granted to officials, free settlers and military staff (Paul Davies Pty Ltd 2007, 11, Thorp 1986, 12). Over time, around 1,699 Europeans had settled in the Nepean region, most of

whom were of Irish and English heritage and were emancipists or convicts assigned to free settlers or those associated with the government or military (Paul Davies Pty Ltd 2007b). Until the establishment of the Great Western Road around 1815, there was no official passage to the Nepean area. In the same year, Governor Lachlan Macquarie conducted his inspection tour of the region (Thorp 1986, 12). The Great Western Road had developed into a main route for travel and communication for the Nepean region by 1817, and in this year the government town of Penrith was also established. Penrith remained a small, roadside settlement into the 1830s (Thorp 1986, 12).

A review of Melville Parish maps indicates that the study area was previously part of a 2,000 acre grant originally alienated in 1805 as a grant to George Johnston by Governor Phillip Gidley King, ostensibly as a gift for his part in stopping the 1804 insurrection at Vinegar Hill (Yarwood 1967). Johnston named the grant 'King's Gift'. George Johnston was a soldier and farmer, born in 1764 in Annandale, Scotland who served throughout England, France, and the East Indies. He played a pivotal role in the removal of William Bligh as Governor in 1808, and was court martialled for his role in this in 1811. Johnston had three sons and four daughters and died in Sydney in 1823 (Yarwood 1967).

After Johnston's passing, the land grant was passed to his daughter, Blanche, who married in 1829 to Captain Weston of the East India Company's Bengal Army. Moving to the 'King's Gift' in 1831 they lived in a marquee until the house was completed on the property in 1834. Weston renamed the property 'Horsley', after his birthplace in Surrey, England. The area later became known as 'Horsley Park' (Davidson 2003). The estate was put up for sale following Blanche's death in 1905, with the advertisement put in the Sydney Morning Herald stating that it was 2,045 acres in size at that point. It is also noted that 'the Water Canal forms a boundary at one end', with a portion of the land having been resumed in the 1870s for the development of the Upper Canal. The Horsley complex, which includes the homestead, outbuildings, garden and farm is located approximately 1.8 kilometres to the south west of the study area. The property was given the following description (The Sydney Morning Herald 1905):

*"The residence has for decades of years been a praise, fashioned after the style of the best Indian bungalow for coolness, and in the height of some of the rooms. It is built of brick, stout walls, cemented, contains wide verandahs, cloven rooms, pantries, detailed building of 3 bedrooms, kitchen, scullery, etc. Basement is superior, and very useful. The Stabling is 11 stalls, 2 loose boxes, coach, and harness rooms, men's rooms, with loft over all. Stockyards, barns, and barnsheds, orchard and vineyard, choice fruits. The Paddocks number sixteen in all, each with dam or creek. Valuable Timber for mill or fuel purposes is standing, computed as worth some thousands. Men's cottages, wine-house. A full detail of the extensive improvements (too numerous to publish) can be seen at the Auctioneers. The residence is on an eminence, surrounded by cleared paddocks, and commands wide and pretty views.*

*To sum up, the points of Horsley are extent of land, excellent surface, and soil features, with nearness to city via a good road and quick trains. Therefore, it is worthy the attention of Squatters (an easy droving of sheep to Flemington), Retired Country or City Gentlemen, Stockbreeders, or it would suit for Scholastic Institution or Sanatorium. The climate is healthy, with crisp, dry atmosphere."*

As of 1906, the land was owned by Augusta Alice Smart, who converted the title from Old Systems to Torrens Title on 27 March of that year. By the 1920s the estate was owned by Arthur Rickard and Co Ltd, who proceeded to subdivide the estate and progressively sell off allotments over the course of the 1920s (NSW Land Registry Services, Primary Application 14277).

In 1925, the company reached an agreement with Fairfield Council to construct roads and approaches on the estate ('HORSLEY PARK ESTATE AGREEMENT' 1925) in advance of the sales which were advertised in 1926 and 1927 ('PICNIC SALE' 1927). The 1926 advertisement appears to mark the beginning of the sale of the estate, with the advertisement stating ('Special Sale' 1926):



*Arthur Rickard and Co. Ltd are handling the property, and a marquee has been erected on the ground to enable the sale to proceed in the event of rain. The average price is estimated to be about £22 an acre, but parcels can be obtained for £13 an acre.*

Historical aerial photographs assist in identifying modern developments that occurred within the study area (Photo 2). An aerial photograph dated to 1930 shows that the initial clearance of trees had occurred. Two roads are visible within the central portion of the study area as an early form of Redmayne Road. A track is also visible within the north east portion. It is likely that the land was used for pastoral grazing at this point in time with no structures visible.



**Photo 2 Aerial photograph dated to 1930 with the study area outlined in red (Source: NSW Spatial Services 2021)**

An aerial photograph dated to 1961 shows that the land within the study area had been subdivided (Photo 3). Further tree clearance has occurred, while additional regrowth vegetation can be seen in the north and west. Redmayne Road has been further established, with the extension to the south west removed. Extensive agricultural use of the land is evident across almost the entirety of the study area. Approximately 27 residential properties and associated buildings have also been constructed throughout the study area and two dams within the central and southmost portions.





**Photo 3 Aerial photograph dated to 1961 with the study area outlined in red (Source: NSW Spatial Services 2021)**

An aerial photograph dated to 1978 shows continued use of the land for agricultural and market gardening purposes (Photo 4). Additional residential development can be seen throughout as well as a further six dams. Racing tracks are also visible in the west, while tree removal has occurred in the north with rubbish piling visible. The same can be said within a 1994 aerial photograph showing further residential and market gardening structures (Photo 5). Tracks within the west have been removed along with vegetation showing an asphalted area. The remaining land shows extensive cropping and agricultural use.





**Photo 4** Aerial photograph dated to 1978 with the study area outlined in red (Source: NSW Spatial Services 2021)





**Photo 5 Aerial photograph dated to 1994 with the study area outlined in red (Source: NSW Spatial Services)**

An aerial photograph dated to 2005 shows the concentration of development along Redmyane Road, with a number of further structures present within this area and to the south (Photo 6). The use of the land for cropping is still occurring while rubbish piling is visible in the north and west. A race track has also been constructed in the north west. Within the southern portion of the study area, a large scour also appears to be present and may be associated with earth works being undertaken in association with the golf driving range located in the southern portion of the study area.





**Photo 6    Aerial photograph dated to 2005 with the study area outlined in red (Source: NSW Spatial Services 2021)**

A current aerial photograph shows agricultural and market gardening practices continue to be prominent within the area (Figure 2). Further rubbish stockpiling can be seen in the west and north, while the majority of residential properties and associated structures remain.

## 3 Aboriginal cultural heritage context

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### 3.1 Ethnohistory

It is generally accepted that Aboriginal people have inhabited the Australian landmass for the last 65,000 years (Clarkson et al. 2017). Dates of the earliest occupation of the continent by Aboriginal people are subject to continued revision as more research is undertaken. The timing for the human occupation of the Sydney Basin is still uncertain. While there is some possible evidence for occupation of the region around 40,000 years ago, the earliest known radiocarbon date for the Aboriginal occupation of the Sydney Basin is associated with a cultural / archaeological deposit at Parramatta, which was dated to 30,735 ± 407 BP (JMCHM 2005d, JMCHM 2005e).

Archaeological evidence of Aboriginal occupation of the Cumberland Plains indicates that the area was intensively occupied from approximately 4,000 years BP (Dallas 1982). Such 'young' dates are probably more a reflection of the conditions associated with the preservation of this evidence and the areas that have been subject to surface and sub-surface archaeological investigations, rather than actual evidence of Aboriginal occupation prior to this time.

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

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

There is some confusion relating to group names, which can be explained by the use of differing terminologies in early historical references. Language groups were not the main political or social units in Aboriginal life. Instead, land custodianship and ownership centred on the smaller named groups that comprised the broader language grouping. There is some variation in the terminology used to categorise these smaller groups; the terms used by Attenbrow (2010) will be used here.

The study area is in the vicinity of three language groups, Dharawal, Gundungurra and the hinterland Darug. Attenbrow (2010, p.34) suggests:

- The Gundungurra covered "the southern rim of the Cumberland Plain west of the Georges River, as well as the southern Blue Mountains".
- The Dharawal covered "the south side of Botany Bay, extending as far as the Shoalhaven River; from the coast to the Georges River and Appin, possibly as far west as Camden".
- The hinterland Darug covered the area "from Appin in the south to the Hawkesbury River in the north; west of the Georges River, Parramatta, the Lane Cove River and Berowra Creek".

These areas are considered to be indicative only and would have changed through time.

After the arrival of European colonisers the movement of Aboriginal people became increasingly restricted. European expansion along the Cumberland Plain was swift and soon there had been considerable loss of land to agriculture. At the same time diseases such as small pox were having a devastating effect on the Aboriginal population. Death, starvation and disease were some of the disrupting factors that led to a reorganisation of the social practices of Aboriginal communities after European contact. The formation of new social groups and alliances were made as Aboriginal people sought to retain some semblance of their previous lifestyle.

### 3.2 Aboriginal heritage located in the study area

An extensive search of the AHIMS database was conducted on 16 March 2021 (Client service ID: 576371). The search identified 103 Aboriginal archaeological sites within a 3.5 kilometre search area, centred on the study area. One of these registered sites (AHIMS 45-5-3082/Horsley Dr PAD) is located *within* the study area (Figure 4). A brief description of AHIMS 45-5-3082/Horsley Dr PAD is provided below.

An archaeological survey was conducted on 5 April 2021 and 14 September 2021 within the following lots; 58A, 58B, and 79B DP 17288, A and B DP 361393, 59A DP362022, 81A and 81B DP 348110, and part of Lot 1 DP849699, lots: 56 and 57 DP 13961, B DP 357890, 1 and 2 DP 505934, A DP 347034, 78B DP 347873, 1 DP849699, B DP 377249, and 61B, 74A, and 79A DP 17288.

No Aboriginal sites were identified within the study area during the survey, however, areas of moderate and high archaeological potential were recorded based upon observations made in the field and the results of the background research.

Areas of moderate archaeological potential were attributed to undisturbed mid to upper hillslopes located within 150 metres of the first order drainage lines within the southern portion and eastern portion of the study area (**Error! Reference source not found.**). Hillslopes within proximity to lower order drainage lines have been commonly associated with areas of PAD, and regional and local studies have determined that subsurface deposits and artefact sites have the potential to occur within 0-250 metres of water sources (Brayshaw McDonald Pty Ltd 1994, KNC 2011, AMBS 2012, White & McDonald 2010, JMCHM 2000, DSCA 2003). It is anticipated that Aboriginal sites that may be identified within these portions of the study area will likely consist of low density background artefact scatters or isolated finds.

Areas of high archaeological potential were defined as undisturbed mid to lower gently inclined hillslopes located between 0-150 metres from the first order drainage line within the southern portion of the study area, and Eastern Creek located adjacent to north-west boundary (**Error! Reference source not found.**). As stated above, hillslopes have been commonly associated with areas of PAD. Previous test excavations undertaken by Haglund and Associates (2007) along the Horsley Drive located directly south of the study area identified 259 artefacts across a number of PADs located within similar landforms (AHIMS 45-5-4679/The Horsley Drive AFT 7, AHIMS 45-5-4682/The Horsley Drive AFT 2, AHIMS 45-5-4683/The Horsley Drive AFT 3, and AHIMS 45-5-4684/The Horsley Drive AFT 4), with concentrations identified within areas overlooking Eastern Creek. Therefore there is potential for low to high density subsurface artefact scatters of a similar nature to be identified within areas of high archaeological potential.

The AR attached in Appendix 5 provides detailed results of the archaeological survey.

#### AHIMS 45-5-3082/Horsley Dr PAD

AHIMS 45-5-3082/Horsley Dr PAD is located in the southern portion of the study area adjacent to the Horsley Drive, NSW. Limited information was available on the site, as the site card has not been digitized and was unavailable to be viewed. Two reports are available relating to AHIMS 45-5-3082/Horsley Dr PAD, this included 'Test excavations for Aboriginal heritage carried out along Proposed Upgrade of The Horsley Drive, Westlink



M7 to Cowpasture Road, Horsley Park, NSW' (Haglund and Associates 2007). The test excavations took place outside of the current study area to the south west but the report noted that areas of PAD were likely to extend beyond the immediate area tested into the current study area.

The other report that was listed to be associated with AHIMS 45-5-3082/Horsley Dr PAD is the 'Cross Country Course Modification, Sydney International Equestrian Centre, Horsley Park: Aboriginal Cultural Heritage Assessment' (Richards 2014). The report does not mention AHIMS 45-5-3082/Horsley Dr PAD except in *Appendix B: Aboriginal sites*, as previously recorded in the vicinity of the study area. It does not indicate the location of AHIMS 45-5-3082/Horsley Dr PAD.

### 3.3 Interpretation of past Aboriginal land use

The study area is situated within the Cumberland Lowlands, which features undulating plains and low hills with dense drainage lines. The study area itself reflects this, possessing moderate to gentle slopes which radiate from the south of the study area towards the west from a crest, and a low lying crest forms a very gentle simple slope on the north east which have been formed atop the Bringelly Shale formation.

Hydrology within the study area includes two first order non-perennial tributaries of Eastern Creek which are located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area.

Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms where the absence of surface artefacts is not considered to be indicative of the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. JMCHM's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007).

A search of the AHIMS database identified one registered site (AHIMS 45-5-3082/Horsley Dr PAD) within the study area, and a further four registered sites (AHIMS 45-5-4679/The Horsley Drive AFT 7, AHIMS 45-5-4682/The Horsley Drive AFT 2, AHIMS 45-5-4683/The Horsley Drive AFT 3, and AHIMS 45-5-4684/The Horsley Drive AFT 4) within 200 metres of the study area. AHIMS 45-5-4679/The Horsley Drive AFT 7, AHIMS 45-5-4682/The Horsley Drive AFT 2, AHIMS 45-5-4683/The Horsley Drive AFT 3, and AHIMS 45-5-4684/The Horsley Drive AFT 4 were excavated by Haglund and Associates in 2007, and recorded on AHIMS by Kelleher Nightingale in 2015, and consisted of low to high density subsurface artefact scatters and surface artefacts found within mid to lower slope within 75 metres of fresh water sources landforms similar to those found within the study area.

AHIMS 45-5-3082/Horsley Dr PAD is also located within gentle slope landform adjacent to the first water drainage line within the southern portion of the study area. AHIMS 45-5-3082/Horsley Dr PAD was inspected as part of archaeological survey undertaken on 5 April 2021. Material evidence of AHIMS 45-5-3082/Horsley Dr PAD was unable to be identified, however this portion of the study area has remained undisturbed and likely still possesses PAD.

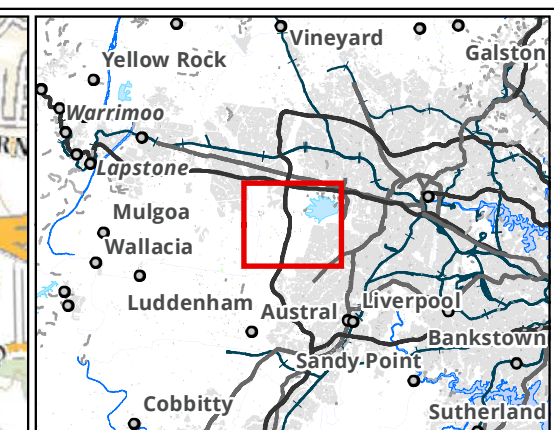
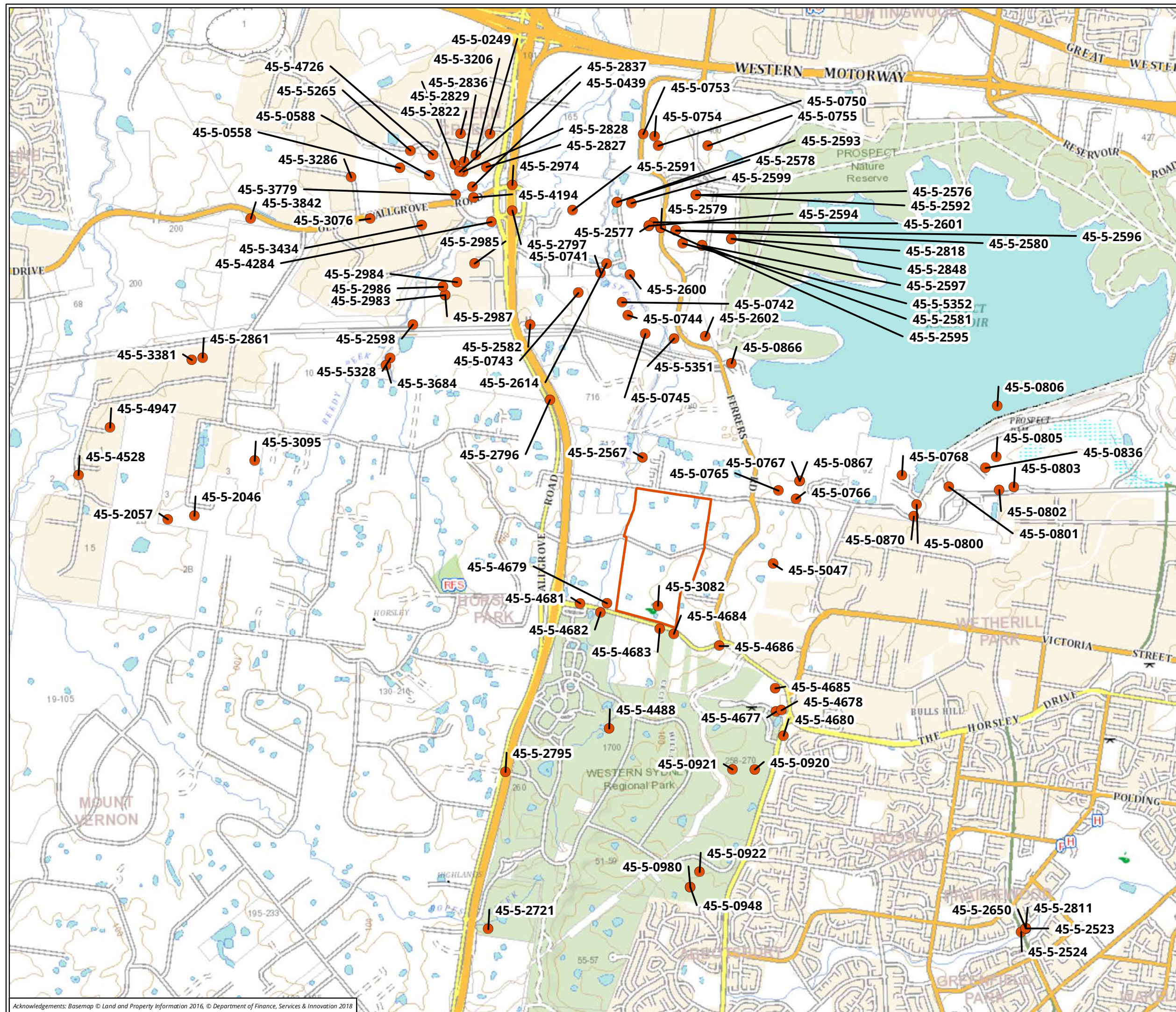


As part of the archaeological survey areas of moderate and high archaeological potential were identified based upon observation made in the field and on predictive modelling for the local region. As stated above, areas of moderate archaeological potential were attributed to undisturbed mid to upper hillslopes located within 150 metres of the first order drainage lines within the southern portion and eastern portion of the study area (**Error! Reference source not found.**). Hillslopes within proximity to lower order drainage lines have been commonly associated with areas of PAD, and regional and local studies have determined that subsurface deposits and artefact sites have the potential to occur within 0-250 metres of water sources (Brayshaw McDonald Pty Ltd 1994, KNC 2011, AMBS 2012, White & McDonald 2010, JMCHM 2000, DSCA 2003).

Areas of high archaeological potential were defined as undisturbed mid to lower gently inclined hillslopes located between 0-150 metres from the first order drainage line within the southern portion of the study area, and Eastern Creek located adjacent to north-west boundary (**Error! Reference source not found.**). As stated above, hillslopes have been commonly associated with areas of PAD. Previous test excavations undertaken by Haglund and Associates (2007) along the Horsley Drive located directly south of the study area identified 259 artefacts across a number of PADs located within similar landforms (AHIMS 45-5-4679/The Horsley Drive AFT 7, AHIMS 45-5-4682/The Horsley Drive AFT 2, AHIMS 45-5-4683/The Horsley Drive AFT 3, and AHIMS 45-5-4684/The Horsley Drive AFT 4), with concentrations identified within areas overlooking Eastern Creek.

It is hypothesised that areas of moderate archaeological potential are likely to contain low density background artefact scatters or isolated finds that area likely to be representative of resource gathering sites within the local region. Within areas of high potential there is also potential for low to high density subsurface artefact scatters of a similar nature to be identified that may also be representative of stone tool production or frequent occupation of the local area by Aboriginal people.





**Legend**

- Study area
- AHIMS record

**NOT TO BE MADE PUBLIC**

**Figure 4 AHIMS records near the study area**

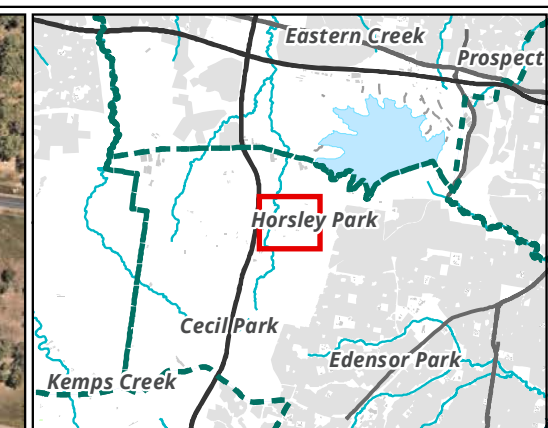
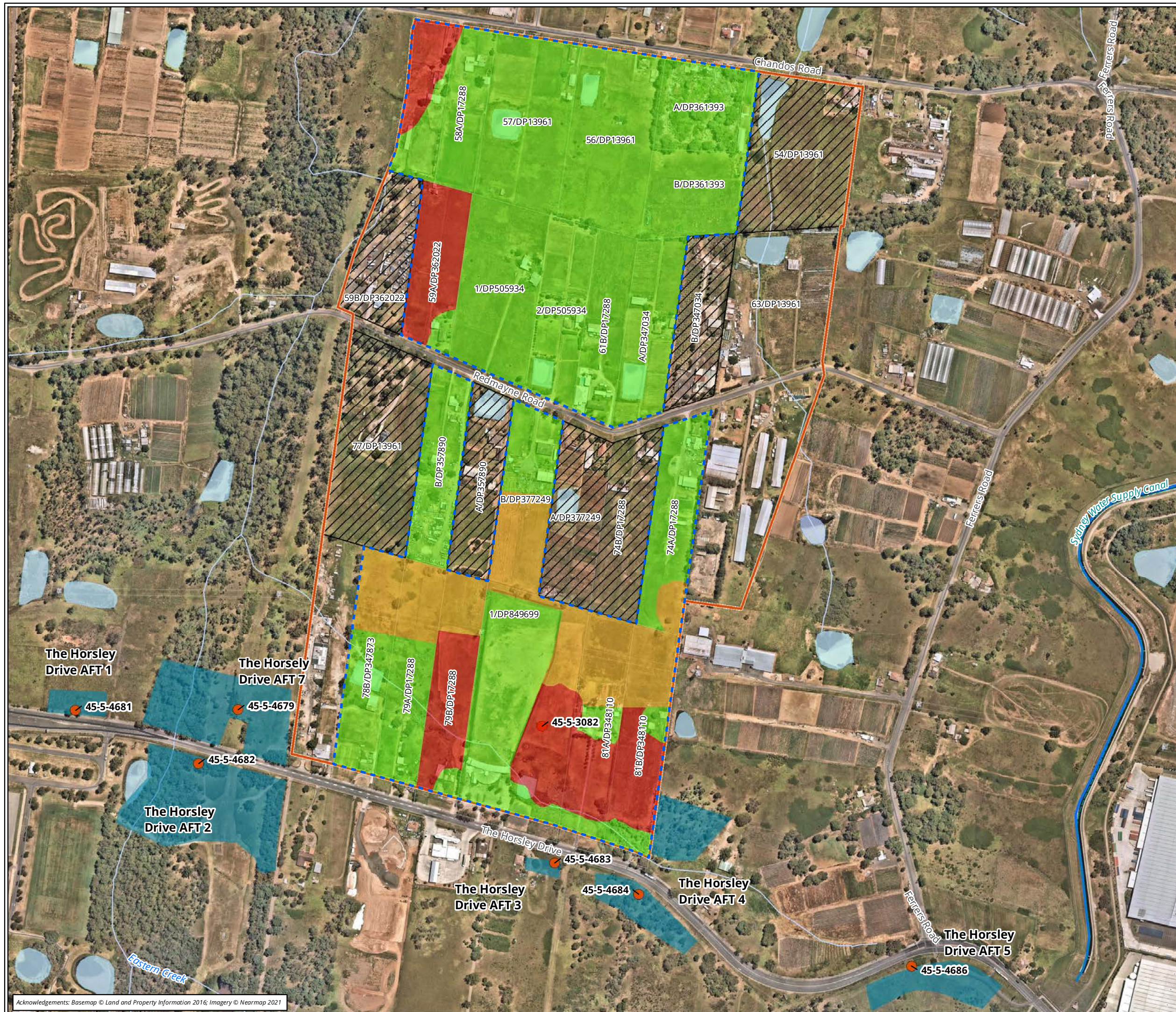
0 200 400 600 800 1,000  
Metres

Scale: 1:30,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56

**biosis**

Matter: 34802,  
Date: 01 June 2021,  
Checked by: MIB, Drawn by: AM, Last edited by: amackegard  
Location: P:\34800s\34802\Mapping\34802\_ADDA\_F7\_AHIMS.mxd





- Legend**
- Study area
  - Lot
  - Surveyed
  - Requiring further investigation
  - AHIMS record
  - Archaeological site
- Archaeological potential**
- High
  - Moderate
  - Low

**NOT TO BE MADE PUBLIC**

**Figure 5 Survey results**



Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
Date: 11 October 2021,  
Checked by: AKE, Drawn by: AM, Last edited by: amackegard  
Location: P:\34800s\34802\Mapping\34802\_ADDA\_F12\_ImpactAssessment.mxd



## 4 Aboriginal community consultation

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

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

#### 4.1.1 Identification of relevant Aboriginal stakeholders

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

- Fairfield City Council
- Heritage NSW, Department of Premier and Cabinet.
- NSW NTSCORP Limited.
- Office of the Registrar, Aboriginal Land Rights Act 1983 of Aboriginal Owners.
- NNTT.
- Greater Sydney Local Land Services.
- Deerubbin LALC.

A list of known Aboriginal stakeholders in the Fairfield LGA was provided by Heritage NSW (a copy of these responses are provided in Appendix 2 and include:

- |  |  |
|--|--|
| • Kamilaroi Yankuntjatjara Working Group | • Gandangara Local Aboriginal Land Council           |
| • Rane Consulting                        | • Ngambaa Cultural Connections                       |
| • Amanda Hickey Cultural Services        | • Ngunawal Heritage Aboriginal Corporation           |
| • Barraby Cultural Services              | • Nundagurri   |
| • Biamanga                               | • Darug Boorooberongal Elders Aboriginal Corporation |
| • Bilinga                                | • Pemulwuy CHTS                                      |
| • Butucarbin Aboriginal Corporation      | • Deerubbin Local Aboriginal Land Council            |
| • Gilay Consultants                      | • Thauaira   |
| • A1 Indigenous Services                 | • Thoorga Nura                                       |
| • Clive Freeman                          | • Wailwan Aboriginal Group                           |
| • Corroboree Aboriginal Corporation      | • Waawaar Awaa Aboriginal Corporation                |
| • Callendulla                            | • Walbunja   |
| • Darug Land Observations                | • Walgalu  |
| • Dharug                                 | • Warragil Cultural Services                         |
| • Dhinawan Culture & Heritage Pty Ltd    |  |

- Didge Ngunawal Clan
- Galamaay Cultural Consultants (GCC)
- Ginninderra Aboriginal Corporation
- Goobah Developments
- Goodradigbee Cultural & Heritage Aboriginal Corporation
- Gulaga
- Gunjeewong Cultural Heritage Aboriginal Corporation
- Gunyuu
- Aragung Aboriginal Cultural Heritage Site Assessments
- Jerringong
- Darug Custodian Aboriginal Corporation
- Darug Aboriginal Land Care
- Munyunga
- Mura Indigenous Corporation,
- Muragadi Heritage Indigenous Corporation
- Murra Bidgee Mullangari Aboriginal Corporation
- Murramarang
- Murrumbul
- Guntawang Aboriginal Resources Incorporated
- Widescope Indigenous Group
- Wingikara
- Wori Woilywa
- Wurrumay Pty Ltd
- Yerramurra
- Yulay Cultural Services
- Yurrandaali
- Anthony Williams
- Badu
- Bidjawong Aboriginal Corporation
- Darug Aboriginal Cultural Heritage Assessments
- Darug Tribal Aboriginal Corporation
- HSB Consultants
- Minnamunnung
- Tocomwall
- Wullung

Office of the Registrar, *Aboriginal Land Rights Act 1983* (NSW) did not provide a list of any known Aboriginal Owners with land within the study area. A search conducted by the NNTT listed no Registered Native Title Claims, Unregistered Claimant Applications or Registered Indigenous Land Use Agreements within the study area.

#### 4.1.2 Public notice

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

- *Fairfield Champion* (14 July 2021)

The advertisement invited Aboriginal people who hold cultural knowledge to register their interest in a process of community consultation to provide assistance in determining the significance of Aboriginal object(s) and/or places in the vicinity of the study area. A copy of the public notice is provided in Appendix 2. No responses were received in regards to the public notice.

#### 4.1.3 Registration of Aboriginal parties

Aboriginal groups identified in Section 4.1.1 were sent a letter inviting them to register their interest in a process of community consultation to provide assistance in determining the significance of Aboriginal object(s) and/or places in the vicinity of the study area. In response to the letters and public notice, a total of 18 groups registered their interest in the project, with two groups requesting for their details to remain

confidential. Responses to registration from Aboriginal parties are provided in Appendix 2. A full list of Aboriginal parties who registered for consultation is provided below:

**Table 4 List of registered Aboriginal parties**

No.	Organisation	Contact person
1	A1 Indigenous Services	Carolyn Hickey
2	Aragung Aboriginal Cultural Heritage Site Assessments	Jamie Eastwood
3	Barraby Cultural Services	Lee Field
4	Butucarbin Aboriginal Corporation	Jennifer Beale
5	Confidential party no.1	N/A
6	Darug Custodian Aboriginal Corporation	Justine Coplin
7	Didge Ngunawal Clan	Lillie Carrol and Paul Boyd
8	Goobah Developments	Basil Smith
9	Goodradigbee Cultural & Heritage Aboriginal Corporation,	Caine Carroll
10	Guntawang Aboriginal Resources Incorporated	Wendy Morgan
11	Kamilaroi Yankuntjatjara Working Group	Phil Khan
12	Murra Bidgee Mullangari Aboriginal Corporation	Darleen and Ryan Johnson
13	Confidential party no.2	N/A
14	Tocomwall	Scott Franks
15	Waawaar Awaa Aboriginal Corporation	Rodney and Barry Gunther
16	Widescope Indigenous Group	Steven and Donna Hickey
17	Yurrandaali	Bo Field
18	Deerubbin Local Aboriginal Land Council	Steven Randall

Darug Custodian Aboriginal Corporation also provided a response on the cultural significance of the area during Stage 1 of the Aboriginal community consultation (9 July 2021), stating that:

*“The Horsley Park area is an area that our group has a vast knowledge of, we have worked and lived in for many years, this area is significant to the Darug people due to the connection of sites and the continued occupation. Our group has been involved in all previous assessments and works in this area as a traditional owner Darug group for the past 40 plus years.”*

The response has been incorporated into the Biosis’ assessment of the Cultural Significance of the study area.

## 4.2 Stage 2: Presentation of information about the proposed project

On 2 August 2021, Biosis provided RAPs with details about the proposed development works (project information pack). A copy of the project information pack is provided in Appendix 3.

## 4.3 Stage 3: Gathering information about cultural significance

### 4.3.1 Archaeological assessment methodology information pack

On 2 August 2021, Biosis provided each RAP with a copy of the project methodology pack outlining the proposed ACHA process and methodology for this project. RAPs were given 28 days to review and prepare feedback on the proposed methodology. A copy of the project methodology pack is provided in Appendix 3.

Widescope Indigenous Group (2 August 2021), Didge Ngunawal Clan (2 August 2021), Barraby Cultural Services (3 August 2021), Goobah (11 August 2021), Goodradigbee Cultural & Heritage Aboriginal Corporation (12 August 2021), Guntawang Aboriginal Resources Incorporated (12 August 2021), and Murra Bidgee Mullangari Aboriginal Corporation (15 August 2021), and Confidential Party no.2 (10 August 2021) responded by confirming their support of the proposed methodology.

Kamilaroi-Yantkuntjatjara Working Group responded in support of the project methodology on 12 August 2021, and provided the following comment:

*"Thank you for your Aboriginal community consult and methodology. Here at KYWG we hold 50 years of cultural knowledge of the area. Aboriginal people have a deep connection to the land, sky, water ways and we have cared for this land for tens of thousands of years and continue to do so. The study area is highly significant to us Aboriginal people we utilised these water ways to the full potential, and they are sacred to us. We would like to agree to your methodology, and we support your report. We look forward to further consultation."*

The response has been incorporated into the Biosis' assessment of the Cultural Significance of the study area.

Confidential party no.1 also responded in support of the project methodology, and provided the following comment (17 August 2021):

*"A field survey is an important process in determining the potential existence of Aboriginal heritage sites and it will also help determine the extent of an excavation program that may follow should Aboriginal heritage sites and suitable land-forms/ soil profiles be identified. The assessment of any study area (with consideration to disturbance) should always take into account the environmental context of the wider area in which a particular site may be found. Cultural connections to landscape spread far and wide over many different types of terrain. Sometimes sites will occur where least expected and others will be under estimated. The proposed assessment methodology outlined for this project is consistent with our views when assessing the potential in identifying Aboriginal heritage across this project site."*

*Dependent on the type of stone artefact that is identified our preference is to rebury common type artefacts, however if a significant type of artefact (hammer-stone, hand axe, grinding stone etc) is identified we would encourage that these types of artefacts be used for educational/training purposes for the local Aboriginal community."*

The recommendation provide by Confidential party no.1 on the future management of identified artefacts will be considered as part of a long term care agreement to be developed in consultation with other RAPs and Frasers Property Industrial.

### 4.3.2 Information gathered during fieldwork

Steven Randall from Deerubbin LALC participated in the field investigation completed on 14 September 2021. Biosis is currently awaiting a formal letter report from Deerubbin LALC. Once received the a record of the letter response will be incorporated into this report.



## 4.4 Stage 4: Review of draft ACHA report

Following completion of the draft ACHA report, it was provided to RAPs on 11 November 2021 for review and comment. RAPs were given 28 days to provide comments and four responses were received as detailed below. Comments on the draft report are provided in Appendix 5.

Goobah (12 November 2021), Murra Bidgee Mullangari Aboriginal Corporation (17 November 2021), and Confidential Party no.1 (21 November 2021) responded by confirming their support of the draft ACHA report.

Kamilaroi-Yantkuntjatjara Working Group responded in support of the draft ACHA on 29 November 2021, and provided the following comment:

*"Thank you for your ACHA for 34802 Keyhole Lands. Aboriginal people have managed the land and cared for it for tens of thousands of years and continue to do so. We have a deep connection with the land, water and sky this connection guides us when walking the land, we are one with mother nature. There are tangible, intangible, and aesthetic aspects that our culture depends on, we must take these into account when doing an assessment of the land. By acknowledging stories and creation stories of the land we work on today and continuing the connection to country through interpretation and passing on this knowledge.*

*We follow the water ways as a giver of life without them we are not here; over the last two hundred years we have lost many water ways due to the arrival of Europeans who have destroyed such water ways due to miss managed land causing catastrophic damage to ecosystems. Major waterways within the area are Ready Creek, Eastern Creek, and Ropes Creek that created a wet land that supply rich resources such as food and medicine. We must also consider practices that have taken place by Aboriginal people to care for country, fire management being a well-known tool of Aboriginal people to manage the landscape, creating ecosystems that today we may not see due to climate change and miss management by the Europeans.*

*Aboriginal people have the knowledge of the land and how ecosystems work they recognised this and created landscapes that suited them and provide resource rich environments. We must also consider burials within the area as Aboriginal people were majorly affected by colonisation and suffered from disposition of their land making it hard to be aware of where their burials are today. Our modern history that we must consider the last two hundred years has affected Aboriginal people dramatically and we are thriving considering the disposition and effects of colonization. Aboriginal cultural groups come from all over NSW, as Aboriginal people were moved due to the stolen generation, this suggest that there are many cultural groups in this area. Today Aboriginal people come from all over Sydney not just one cultural group and we continue to thrive and excel moving forward.*

*We would like to recommend a cultural interpretation plan for this project to educate the wider community and continuing the passing down of knowledge to our younger generations. This can be achieved through native landscaping, edible gardens, art, digital displays, sound scape, water features, with in your design and much more. We would like to agree to your recommendation, and we support your ACHA, we look forward to working alongside you on this project."*

The recommendation provide by Kamilaroi-Yantkuntjatjara Working Group on a cultural interpretation plan will be considered as part of a cultural interpretation strategy recommendation to Frasers Property Industrial, to be developed in consultation with RAPs.

## 5 Aboriginal cultural significance assessment

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

### 5.1 Introduction to the assessment process

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

- **Historical significance** (evolution and association) refers to historic values and encompasses the history of aesthetics, science and society, and therefore to a large extent underlies all of the terms set out in this section. A place may have historic value because it has influenced, or has been influenced by, a historic figure, event, phase or activity. It may also have historic value as the site of an important event. For any given place the significance will be greater where evidence of the association or event survives *in situ*, or where the settings are substantially intact, than where it has been changed or evidence does not survive. However, some events or associations may be so important that the place retains significance regardless of subsequent treatment.
- **Aesthetic significance** (Scenic/architectural qualities, creative accomplishment) refers to the sensory, scenic, architectural and creative aspects of the place. It is often closely linked with social values and may include consideration of form, scale, colour, texture, and material of the fabric or landscape, and the smell and sounds associated with the place and its use.
- **Social significance** (contemporary community esteem) refers to the spiritual, traditional, historical or contemporary associations and attachment that the place or area has for the present-day community. Places of social significance have associations with contemporary community identity. These places can have associations with tragic or warmly remembered experiences, periods or events. Communities can experience a sense of loss should a place of social significance be damaged or destroyed. These aspects of heritage significance can only be determined through consultative processes with local communities.
- **Scientific significance** (Archaeological, industrial, educational, research potential and scientific significance values) refers to the importance of a landscape, area, place or object because of its archaeological and/or other technical aspects. Assessment of scientific value is often based on the likely research potential of the area, place or object and will consider the importance of the data involved, its rarity, quality or representativeness, and the degree to which it may contribute further substantial information.

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

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

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

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

## 5.2 Cultural (social significance) values

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

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

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

- Darug Custodian Aboriginal Corporation (9 August 2021) stated that "The Horsley Park area is an area that our group has a vast knowledge of, we have worked and lived in for many years, this area is significant to the Darug people due to the connection of sites and the continued occupation."
- Kamilaroi-Yankuntjatjara Working Group (12 August 2021), stated that "Aboriginal people have a deep connection to the land, sky, water ways and we have cared for this land for tens of thousands of years and continue to do so. The study area is highly significant to us Aboriginal people we utilised these water ways to the full potential, and they are sacred to us."

### 5.3 Historic values

Historic significance refers to associations a place or object may have with a historically important person, event, phase or activity to the Aboriginal and other communities. The study area is not known to have any historic associations.

### 5.4 Archaeological (scientific significance) values

An archaeological scientific assessment was unable to be provided for the study area at this stage as test excavations are yet to be undertaken. Following completion of test excavations the archaeological significance assessment will be updated.

### 5.5 Aesthetic values

The study area is in a moderately undisturbed landform setting. While there have been disturbances within each individual lot, the larger area as a whole is a typical example of crests and slopes in their natural context. The landscape of the study area is closely linked with Aboriginal cultural values and provides a context for Aboriginal sites that gives a strong sense of place. The Darug Aboriginal community strongly identifies with the landscape of the study area.

### 5.6 Statement of significance

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

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

The combined use of these guidelines is widely considered to represent the best practice for assessments of Aboriginal cultural heritage. The identification and assessment of cultural heritage values includes the four values of the Burra Charter: social, historical, scientific and aesthetic values. Table 5 outlines the significance ranking criteria for the study area, please note at this point in time not all significance criteria can be assessed.

#### 5.6.1 Statement of significance for AHIMS 45-5-3082/Horsley Dr PAD

The archaeological scientific assessment was unable to be provided for the study area at this stage as test excavations are yet to be undertaken. Following completion of test excavations the statement of significance will be updated.

**Table 5 Significance assessment criteria**

Site name	Criteria	Ranking
<b>AHIMS 45-5-3082/ Horsley Dr PAD</b>	Cultural – discussions with the local Aboriginal communities reflect that the site is high in value.	High
	Historical – the site is not connected to any historical event or personage.	Low
	Scientific – the site possesses some archaeological values.	Unknown
	Aesthetic – the site is located within a moderately undisturbed landscape. While there are disturbances on each lot, the overall area is a typical example of crests and slopes in their natural context.	Moderate

## 6 Development limitations and mitigation measures

Within the study area, there is one recorded Aboriginal sites that may be subject to harm. As test excavations are yet to be undertaken its scientific significance is unknown, and there may be other Aboriginal sites within the study area. Strategies to avoid or minimise harm to Aboriginal heritage in the study area are discussed below.

A summary of the potential impacts of the proposed works on known Aboriginal sites within the study area is provided in Table 6.

**Table 6 Summary of potential archaeological impact**

AHIMS site no.	Site name	Significance	Type of harm	Degree of harm	Consequence of harm
AHIMS 45-5-3082	Horsley Dr PAD	Unknown	Direct	Total	Total loss of value

### 6.1 Potential risks to Aboriginal cultural heritage

A draft Master Plan of the proposed future development shows that the development will have the potential to impact AHIMS 45-5-3082/Horsley Dr PAD and areas of moderate and high archaeological potential identified by Biosis' assessment (Figure 6). While this project is at the planning stage, the masterplan indicates that warehouses will be built throughout the entire study area. Impacts from this may include:

- Earthworks, which will involve the removal of topsoil and subsoil.
- Installation of services and other infrastructure, which will disturb the soils within the study area.

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

### 6.2 Avoiding harm to Aboriginal heritage

Avoidance of impacts to archaeological and cultural heritage sites through design of the development is the primary mitigation and management strategy, and should be implemented where practicable. To adequately determine the potential impacts on archaeological sites in the study area, further investigation of lots which were not accessible during the archaeological survey undertaken on 5 April 2021 and 14 September 2021 is recommended.

### 6.3 Management and mitigation measures

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

Consultation with the Aboriginal community has identified the Horsley Park area has high cultural significance to the Darug Aboriginal community. It is recommended that opportunities for heritage interpretation are explored and implemented for the project in consultation with Aboriginal stakeholders. The purpose of the



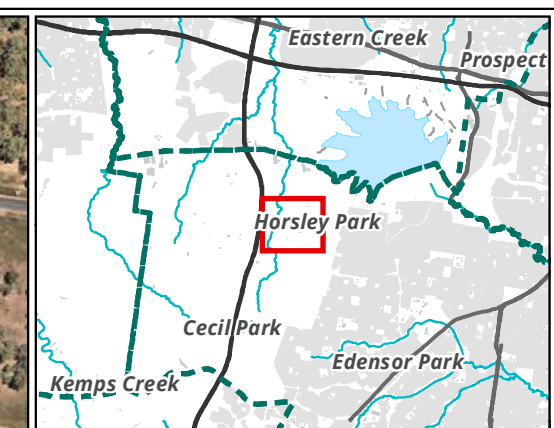
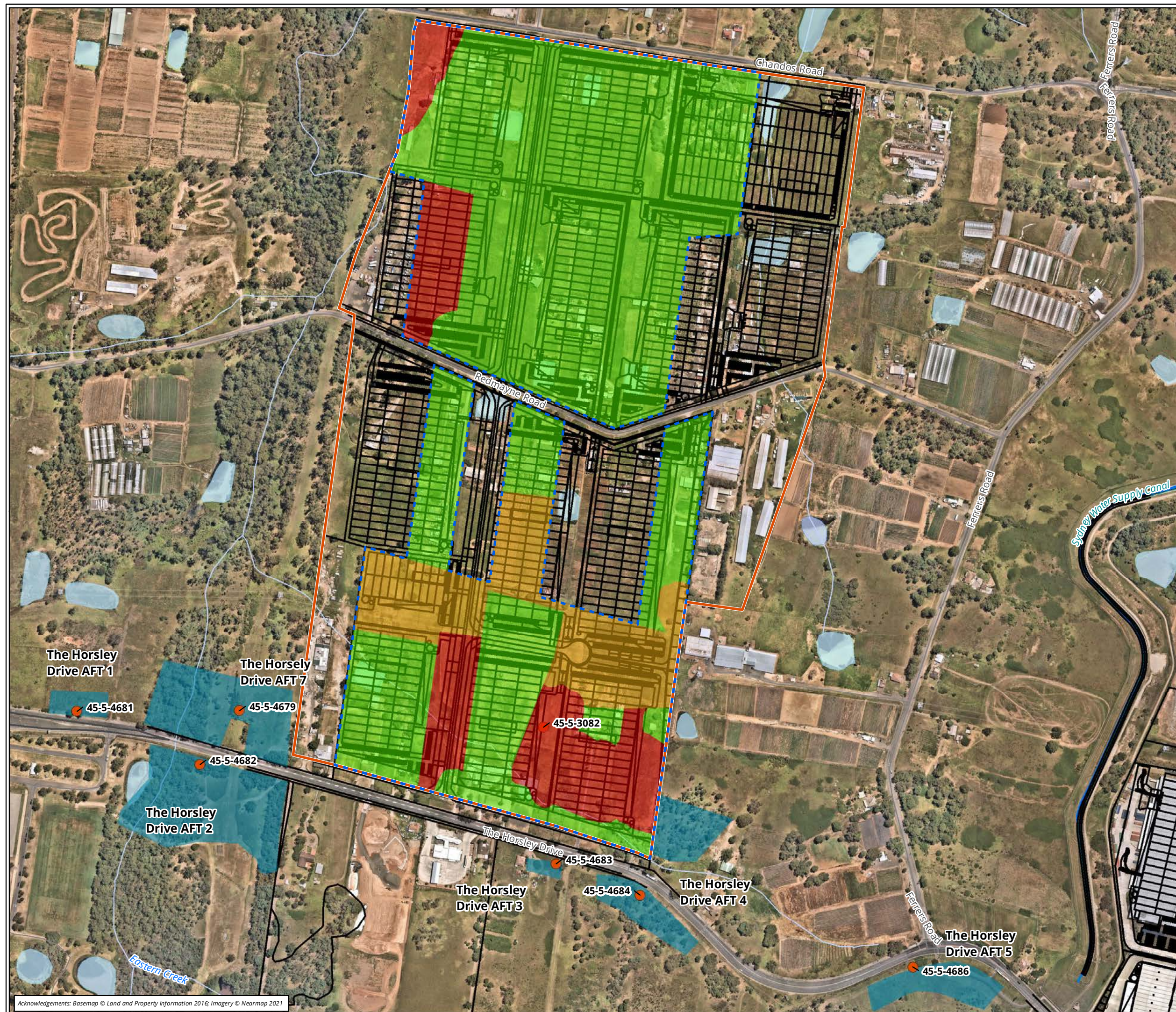
strategy is to ensure that the traditional, historical and contemporary cultural values and meanings held by Aboriginal people of the region are indelibly integrated into the Horsley Park project in a meaningful, culturally appropriate and practical way.

In addition to further investigation of lots which were not accessible during the previous archaeological surveys, test excavations will also need to take place within the areas of moderate and high archaeological potential, and within AHIMS 45-5-3082/Horsley Dr PAD. This should be undertaken if impacts cannot be avoided through the redesign of the Master Plan. Test excavations will aim to identify whether Aboriginal archaeological deposits exist beneath the ground surface, and will define the nature and extent of potential archaeological deposits which may be present. This additional information will allow an accurate description of the archaeological significance of the study area to be developed, so that an assessment of impacts to Aboriginal cultural heritage values can be completed. Following the completion of further investigations this ACHA will be updated with the results of the additional survey and test excavation efforts. If Aboriginal cultural heritage values are identified by the further investigations and cannot be avoided through redesign, an AHIP may be required to allow for direct impacts to Aboriginal sites to occur.

An AHIP is required for any activities likely to have an impact on Aboriginal objects or Places or cause land to be disturbed. Heritage NSW issues AHIPs under Part 6 of the NPW Act. The AHIP should be obtained prior to the proposed future development proceeding.

In order to obtain an AHIP, a complete ACHA prepared in accordance with Consultation Requirements and the *Guide to investigating, Assessing and Reporting on Aboriginal Cultural Heritage* (OEH 2011) must be provided as part of application requirements. Biosis therefore recommends that Aboriginal community consultation in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010b) be completed in order to finalise the ACHA.

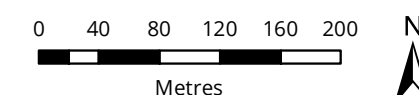




- Legend**
- Study area
  - Surveyed
  - AHIMS record
  - Archaeological site
  - Draft Master Plan - future development
- Archaeological potential**
- High
  - Moderate
  - Low

**NOT TO BE MADE PUBLIC**

**Figure 6 Impact assessment**



Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
Date: 11 October 2021,  
Checked by: AKE, Drawn by: AM, Last edited by: amackegard  
Location: P:\34800s\34802\Mapping\34802\_ADDA\_F11\_SurveyResults.mxd



## 7 Recommendations

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The recommendations below respond specifically to the wishes of the RAPs. Recommendations regarding the archaeological value of the site, and the subsequent management of Aboriginal cultural heritage is provided in the AR (Appendix 5).

### **Recommendation 1: Further archaeological survey of remaining portions of the study area**

Biosis recommends that a comprehensive archaeological survey of the entire study area be undertaken to inform this assessment. It is recommended that portions of the site which were not investigated as part of the archaeological survey completed by Biosis on 5 April 2021 and 14 September 2021 (refer to Table 3), should be surveyed. Further archaeological surveys should be undertaken in accordance with the Code.

### **Recommendation 2: Avoidance of AHIMS 45-5-3082/Horsley Dr PAD and areas identified as having moderate/high archaeological potential**

Biosis recommends that avoidance of AHIMS 45-5-3082/Horsley Dr PAD and areas identified as having moderate/high archaeological potential should be undertaken wherever possible through redesign (Figure 6). If impacts to AHIMS 45-5-3082/Horsley Dr PAD and areas of moderate/high archaeological potential cannot be avoided Recommendation 3 must be undertaken prior to undertaking any works on site.

### **Recommendation 3: Test excavations**

Based on current development plans it is unlikely that AHIMS 45-5-3082/Horsley Dr PAD and areas identified as having moderate/high archaeological potential can be avoided. If impacts cannot be avoided through redesign, further investigation in the form of test excavations is recommended. Test excavations should be undertaken in accordance with the Code. This would also include any additional areas of moderate or high potential identified through the comprehensive archaeological survey as outlined in Recommendation 1.

### **Recommendation 4: Areas identified as having low archaeological potential**

No further investigations are required for areas assessed as having low archaeological potential. This recommendation is conditional upon Recommendations 7, 8, and 9.

### **Recommendation 5: Consultation with the registered Aboriginal parties**

It is recommended that consultation with RAPs be undertaken in accordance with consultation requirements as part of the ACHA currently being prepared by Biosis. The proponent should inform RAPs about the project and future development. RAPs should be given the opportunity to provide information regarding the cultural significance of the study area, and to provide comment on the management of Aboriginal cultural heritage values within the study area throughout the life of the project.

### **Recommendation 6: Updates to AR and ACHA**

Biosis recommends that following the completion of further investigations and consultation with RAPs that the AR and ACHA be updated and finalised.

### **Recommendation 7: Heritage interpretation strategy**

The Horsley Park area has a rich Aboriginal history and it is recommended that opportunities for heritage interpretation are explored and implemented for the project in consultation with Aboriginal stakeholders. The



purpose of the strategy is to ensure that the traditional, historical and contemporary cultural values and meanings held by Aboriginal people of the region are indelibly integrated into the Keyhole Lands project in a meaningful, culturally appropriate and practical way.

### **Recommendation 8: Discovery of unanticipated Historical relics**

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

### **Recommendation 9: Discovery of unanticipated Aboriginal objects**

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

### **Recommendation 10: Discovery of human remains**

Human remains may be found in a variety of landscapes in NSW, including middens and sandy or soft sedimentary soils. If any suspected human remains are discovered during any activity you must:

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

## References

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Allen, J & O'Connell, J 2003, 'The long and the short of it: archaeological approaches to determining when humans first colonised Australia and New Guinea', *Australian Archaeology*, vol. 57, pp. 5–19.

Australia ICOMOS 2013, *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance*, Australia ICOMOS, Burwood, VIC.

Biosis Pty Ltd 2016, *Darcoola west water efficiency scheme: Aboriginal cultural heritage assessment report*, Unpublished report to Department of Primary Industries – Water, Authors: Atkinson, A, Smith, S & Cole, J.

Bowler, JM et al. 2003, 'New ages for human occupation and climatic change at Lake Mungo, Australia', *Nature*, vol. 421, no. 6925, pp. 837–840.

Clarkson, C et al. 2017, 'Human occupation of northern Australia by 65,000 years ago', *Nature*, vol. 547, no. 7663, p. 306.

CSIRO 2009, *Australian soil and land survey field handbook*, 3rd edn, CSIRO Publishing & National Committee on Soil and Terrain, Collingwood, Victoria.

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

DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment and Climate Change, Sydney NSW.

OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

## Appendices

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## Appendix 1 Consultation log

### Stage 1 – Notification of project proposal and registration of interest

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

Organisation contacted	Date and type of contact	Date and type of response	Response details
Heritage NSW Parramatta Office	23/06/2021, email	25/06/2021	Provided list of Registered Aboriginal Parties in the Fairfield LGA.
Native Title Services CORP Limited	23/06/2021, email	-	-
National Native Title Tribunal, Geospatial	23/06/2021, email	23/06/2021, email	No Native Title Determination Applications, Determinations of Native Title, or Indigenous Land Use Agreements over the identified area.
Office of the Registrar, Department of Aboriginal Affairs	23/06/2021, email	-	-
Greater Sydney Local Land Services	23/06/2021, email	24/06/2021, email	GS LLS feels that it is not a primary source of contact for First Nations (Aboriginal) communities or persons that may inform or provide comment on development or planning issues.
Fairfield City Council	23/06/2021, email	-	-
Deerubbin Local Aboriginal Land Council	23/06/2021, email	-	-

#### Step 2- Public advertisement

The public notice was published in the Fairfield Champion on 14 July 2021. A copy of the advertisement is provided in Appendix 2.

#### Step 3- Registration of interest.

The registration period ran from the 8 July 2021 to 22 July 2021. Leeway was given to Aboriginal parties/groups who provided responses shortly after the close of this period and they have been registered as Aboriginal parties for consultation.

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
1	Kamilaroi Yankuntjatjara Working Group	08/07/2021, email	08/07/2021, email	Thank you for informing us that Biosis will be involved in an Aboriginal Cultural Heritage Assessment for the Keyhole Lands Project & that you are inviting Aboriginal

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
				<p>organisations to register, if they wish too be involved in the community consultation process.</p> <p>As a senior Aboriginal person for the past 50yrs, I actively participate in the protection of the Aboriginal Cultural Heritage throughout the Sydney Basin, &amp; particularly throughout Western Sydney, on behalf of Kamilaroi Yankuntjatjara Working Group I wish to provide to you my organisation's registration of interest.</p> <p>I wish to be involved &amp; participate in all levels of consultation/project involvement. I wish to attend all meetings, participate in available field work &amp; receive a copy of the report.</p> <p>I have attached a copy of Kamilaroi Yankuntjatjara Working group's Public Liability Insurance &amp; Workers Compensation certificate.</p> <p>Our Rates - \$100 per hour, \$400 half day &amp; \$800 full day (Exc. GST)</p> <p>Our RAPS have up to 15yrs Cultural Heritage experience in – field work which involves manual excavation (digging), sieving , identifying artefacts, setting up transits, setting up equipment, packing equipment, site surveys &amp; attending meetings.</p> <p>Should you wish me to provide further information, please do not hesitate to contact me on 0434545982 or Stefeanie on 0451068480.</p>
2	Rane Consulting	08/07/2021, email	-	-
3	Amanda Hickey Cultural Services	08/07/2021, email	-	-
4	Barraby Cultural Services	08/07/2021, email	17/07/2021, email	Barraby Cultural Services would like to register for this project.
5	Biamanga	08/07/2021, email	-	-
6	Bilinga	08/07/2021, email	-	-
7	Butucarbin Aboriginal Corporation	08/07/2021, email	23/07/2021, email	<p>Butucarbin Aboriginal Corporation is a successful not for profit community organisation that was established in 1989 to provide Community Development, Education and Training to organisations and individuals in the Blacktown and Penrith LGA's of Western Sydney. The organisation has won many awards for outstanding service delivery over the past 23 years. The latest being our Executive Officer Jennifer Beale being a finalist in the 2014 NSW Australian of</p>

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
				<p>the Year awards.</p> <p>Due to the changes in funding for Aboriginal organisations and for Butucarbin to continue the service that they have been providing, the organisation has developed an Aboriginal Cultural Heritage Assessment business. All profits go back into the organisation to provide services to the community. As community workers we believe it is our duty to involve the Aboriginal community of Western Sydney in this work, as it enables the community to be involved in decisions relating to their culture and therefore, promotes self-determination.</p> <p>Butucarbin is a contemporary example of cultural heritage in that it is a product of the 1970's resettlement program and self-determination policy (see, Aboriginal Community Controlled Organisations). Due to this resettlement policy, there are generations of Aboriginal people who have been born in Western Sydney and have been raised in the Mount Druitt Community (which has the highest Aboriginal urban population in Australia) and thus, this is where their connection lies. Ultimately, our cultural connection lies in our community work and assistance to the people of wider Western Sydney</p> <p>In conclusion, we also believe it is essential to pass on knowledge from generation to generation. Butucarbin provides cultural knowledge to the wider community through Aboriginal Cultural workshops and community development programs.</p> <p>Previous experience</p> <p>We have participated in projects with such companies as, Extent, Niche, Kelleher Nightingale, Artefact, AMBS, Virtus Heritage, Navin Officer, Curio and Biosis. This work has involved activities such as, site-walkovers, surface collections, ACHA reviews and excavations.</p> <p>When on site, our workers were on time, professional and participate in all tasks set for them. It is essential for our community members to participate in Aboriginal Community Consultations and other cultural work as we believe it is of the utmost importance that cultural heritage skills and knowledge are passed on to our younger Aboriginal generations.</p> <p>Overall, our team is highly skilled and has over ten years' experience in cultural heritage assessment field work.</p> <p>Currently, our team consists of several skilled field officers. We ensure there is diversity amongst our workers in that we do not discriminate against gender and age. In fact, we strongly encourage the employment of individuals of all</p>



No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
				ages and genders as it is essential to gain insight into cultural heritage from varying perspectives.
8	Gilay Consultants	08/07/2021, email	-	-
9	A1 Indigenous Services	08/07/2021, email	09/07/2021, email	<p>Thank you for your email, I would like to register in being involved in all levels of consultation for this project. Including, Meetings, Reports, Sharing Cultural Information, and available Field Work.</p> <p>I am a traditional custodian with over 20 years experience in helping preserve Aboriginal cultural heritage on projects. I hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and values that exist in the project area.</p> <p>I have attached A1 Indigenous Services Insurances. We would like the Proponent to consider including A1's, Kawalkan youth and the Women's Circle Employees for all future field work.</p>
10	Clive Freeman	08/07/2021, email	-	-
11	Corroboree Aboriginal Corporation	08/07/2021, email	-	-
12	Callendulla	08/07/2021, email	-	-
13	Darug Land Observations	08/07/2021, email	-	-
14	Dharug	08/07/2021, email	-	-
15	Dhinawan Culture & Heritage Pty Ltd	08/07/2021, email	-	-
16	Didge Ngunawal Clan	08/07/2021, email	08/07/2021, email	DNC would like to register an interest into keyhole lands project stage one.
17	Galamaay Cultural Consultants (GCC)	08/07/2021, email	-	-
18	Ginninderra Aboriginal Corporation	08/07/2021, email	-	-
19	Goobah Developments	08/07/2021, email	20/07/2021, email	Please accept my expression of interest with the above project and wish to be kept informed on any further developments
20	Goodradigbee Cultural	08/07/2021,	14/07/2021,	Goodradigbee would like to register our interest in the

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
	& Heritage Aboriginal Corporation,	email	email	project. Best contact will be Caine and contact email is <a href="mailto:caine@gcahac.com.au">caine@gcahac.com.au</a> Please keep us updated on this project.
21	Gulaga	08/07/2021, email	-	-
22	Gunjeewong Cultural Heritage Aboriginal Corporation	08/07/2021, email	-	-
23	Gunyu	08/07/2021, email	-	-
24	Aragung Aboriginal Cultural Heritage Site Assessments	08/07/2021, email	10/07/2021, email	Thank you for your recent emailed invitation to register for Aboriginal community Consultation regarding a Aboriginal Cultural Heritage Assessment for the proposed rezoning of Horsley Park Drive Horsley Park NSW. Aragung Aboriginal Cultural Heritage site Assessments is pleased to accept your invitation and would like to register as a Aboriginal stake Holder for this assessment. Aragung would like to be updated to all aspects of this assessments and would like to be considered for engagement to participate in archaeological field work investigation should they be required.
25	Jerringong	08/07/2021, email	-	-
26	Darug Custodian Aboriginal Corporation	08/07/2021, email	08/07/2021, email	Our group is a non- profit organisation that has been active for over forty years in Western Sydney, we are a Darug community group with over three hundred members. The main aim in our constitution is the care of Darug sites, places, wildlife and to promote our culture and provide education on the Darug history. The Horsley Park area is an area that our group has a vast knowledge of, we have worked and lived in for many years, this area is significant to the Darug people due to the connection of sites and the continued occupation. Our group has been involved in all previous assessments and works in this area as a traditional owner Darug group for the past 40 plus years. Therefore, we would like to register our interest for full consultation and involvement in the above project area. Please contact us with all further enquiries on the above contacts.
27	Darug Aboriginal Land	08/07/2021,	-	-

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
	Care	email		
28	Munyunga	08/07/2021, email	-	-
29	Mura Indigenous Corporation	08/07/2021, email	-	-
30	Muragadi Heritage Indigenous Corporation	08/07/2021, email	-	-
31	Murra Bidgee Mullangari Aboriginal Corporation	08/07/2021, email	08/08/2021	Could you please register our corporation for the above project.
32	Murramarang	08/07/2021, email	-	-
33	Murrumbul	08/07/2021, email	-	-
34	Gandangara Local Aboriginal Land Council	08/07/2021, email	-	-
35	Ngambaa Cultural Connections	08/07/2021, email	-	-
36	Ngunawal Heritage Aboriginal Corporation	08/07/2021, email	-	-
37	Nundagurri	08/07/2021, email	-	-
38	Darug Boorooberongal Elders Aboriginal Corporation	08/07/2021, email	-	-
39	Pemulwuy CHTS	08/07/2021, email	-	-
40	Deerubbin Local Aboriginal Land Council	08/07/2021, email	18/08/2021, email	Later registration via phone.
41	Thauaira	08/07/2021, email	-	-
42	Thoorga Nura	08/07/2021, email	-	-
43	Wailwan Aboriginal Group	08/07/2021, email	-	-
44	Waawaar Awaa Aboriginal Corporation	08/07/2021, email	13/07/2021, email	Please register Waawaar Awaa Aboriginal Corporation for the Aboriginal Cultural Heritage Assessment at Keyhole



No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
				Lands, Horsley Park Drive, Horsley Park New South Wales.  Relevant insurances are attached for future reference.
45	Walbunja	08/07/2021, email	-	-
46	Walgalu	08/07/2021, email	-	-
47	Warragil Cultural Services	08/07/2021, email	-	-
48	Guntawang Aboriginal Resources Incorporated	08/07/2021, email	21/07/2021, email	Thank you very much for your invitation to be part of the Aboriginal Community consultation re: Assisting Biosis GARI accepts your invitation with great pleasure. GARI's Cultural and Heritage Officer has participated in excavations in this area in the past and hold cultural knowledge and experience working with Archaeologist.
49	Widescope Indigenous Group	08/07/2021, email	27/07/2021, email	Steven Hickey would like to register his interest in the project.
50	Wingikara	08/07/2021, email	-	-
51	Wori Woilywa	08/07/2021, email	-	-
52	Wurrumay Pty Ltd	08/07/2021, email	-	-
53	Yerramurra	08/07/2021, email	-	-
54	Yulay Cultural Services	08/07/2021, email	-	-
55	Yurrandaali	08/07/2021, email	03/08/2021, email	Yurrandaali would like to register for this project.
56	Anthony Williams	08/07/2021, mail	-	-
57	Badu	08/07/2021, mail	-	-
58	Bidjawong Aboriginal Corporation	08/07/2021, mail	-	-
59	Darug Aboriginal Cultural Heritage	08/07/2021, mail	-	-

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
	Assessments			
60	Darug Tribal Aboriginal Corporation	08/07/2021, mail	-	-
61	HSB Consultants	08/07/2021, mail	-	-
62	Minnamunnung	08/07/2021, mail	-	-
63	Tocomwall	08/07/2021, mail	15/07/2021, email	Please be advised that Tocomwall only received today in the post the invitation to register and interest in the Keyhole Lands today 15th July 2021. Australia post know longer guarantee any time frame for surface mail and as such posting notification do not guarantee Raps revise this notice in time to register. Could you please register Tocomwall's interest in this project please?
64	Wullung	08/07/2021, mail	-	-

## Stage 2 and Stage 3 – Presentation of information about the proposed project and Gathering information about cultural significance

### Step 1- Provision of project methodology pack and consultation meeting

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

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
1	A1 Indigenous Services	02/08/2021, email	-	-
2	Aragung Aboriginal Cultural Heritage Site Assessments	02/08/2021, email	-	-
3	Barraby Cultural Services	02/08/2021, email	03/08/2021, email	I on behalf of Barraby Cultural Services agrees with the proposed methodology for this project.
4	Butucarbin Aboriginal Corporation	02/08/2021, email	-	-
5	Confidential party no.1	02/08/2021, email	06/08/2021, email	We agree with methodology.
6	Darug Custodian Aboriginal Corporation	02/08/2021,	-	-

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
		email		
7	Didge Ngunawal Clan	02/08/2021, email	02/08/2021, email	DNC is happy with the methodology for the keyhole lands project Fully insured and experienced site officers.
8	Goobah Developments	02/08/2021, email	11/08/2021, email	This is confirmation that we support project information and assessment methodology Keyhole Lands, Horsley Park. Drive, Horsley Park New South Wales (NSW) please keep us informed on any further developments with this project.
9	Goodradigbee Cultural & Heritage Aboriginal Corporation,	02/08/2021, email	11/08/2021, email	Thanks for the email and update. At this stage we don't have any comments or feedback to provide. Report looks fine and following all the relevant purposes.
10	Guntawang Aboriginal Resources Incorporated	02/08/2021, email	12/08/2021, email	As a RAP in this local Government Area I would like to thank you for informing GARI of this project and keeping us informed of the process.  GARI understands that some of the dates of the schedule would be pushed back due to the Fairfield Area been in lock-down because of the Covid-Delta pandemic.  GARI also agrees with the proposed Archaeological test excavations and methodology. We also agree with the Storage of cultural materials.
11	Kamilaroi Yankuntjatjara Working Group	02/08/2021, email	12/08/2021, email	Thank you for your Aboriginal community consult and methodology. Here at KYWG we hold 50 years of cultural knowledge of the area. Aboriginal people have a deep connection to the land, sky, water ways and we have cared for this land for tens of thousands of years and continue to do so. The study area is highly significant to us Aboriginal



No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
				people we utilised these water ways to the full potential, and they are sacred to us. We would like to agree to your methodology, and we support your report. We look forward to Further consultation.
12	Murra Bidgee Mullangari Aboriginal Corporation	10/08/2021, email (late registration)	15/08/2021, email	I have read the project information and methodology for the above project, I endorse the recommendations made.
13	Confidential party no.2	02/08/2021, email	19/08/2021, email	Thank you for providing us with a copy of the project information and assessment methodology. Please refer to the attached document for further information. We look forward to working with you on this project. If you require any further information please do not hesitate to contact us.
14	Tocomwall	02/08/2021, email	-	-
15	Waawaar Awaa Aboriginal Corporation	02/08/2021, email	-	-
16	Widescope Indigenous Group	02/08/2021, email	02/08/2021	Thank you for providing me with the Methodology Re: Keyhole Lands Project I have reviewed and support the recommendations out lined in the Aboriginal Cultural Heritage Assessment (ACHA) I would like to be considered for field work. Thank you I look forward to assisting the team on the project
17	Yurrandaali	10/08/2021, email (late registration)	-	-
18	Deerubbin Local Aboriginal Land Council	18/08/2021, email (late registration)	-	-

## Step 2- Field survey

Organisation contacted	Date and type of contact	Date and type of response	Response details
<b>Deerubbin Local Aboriginal Land Council</b>	14 September 2021, field survey	14 September 2021, field survey	Steven Randall attended the field investigation. No comments were received. A formal letter report is expected to be provided.

## Stage 4 – Review of draft report

### Step 1- Provision of draft report for review

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
1	A1 Indigenous Services	11/11/2021, Email	-	-
2	Aragung Aboriginal Cultural Heritage Site Assessments	11/11/2021, Email	-	-
3	Barraby Cultural Services	11/11/2021, Email	-	-
4	Butucarbin Aboriginal Corporation	11/11/2021, Email	-	-
5	Confidential party no.1	11/11/2021, Email	21/11/2021, Email	We agree with the draft.
6	Darug Custodian Aboriginal Corporation	11/11/2021, Email	-	-
7	Didge Ngunawal Clan	11/11/2021, Email	-	-
8	Goobah Developments	11/11/2021, Email	12/11/2021, Email	This is confirmation that we support the draft Keyhole Lands project Aboriginal Cultural Heritage Assessment (ACHA) Horsley Park Drive, Horsley Park New South Wales and wish to be kept informed on any further developments.
9	Goodradigbee Cultural & Heritage Aboriginal Corporation,	11/11/2021, Email	-	-
10	Guntawang Aboriginal Resources Incorporated	11/11/2021, Email	-	-
11	Kamilaroi Yankuntjatjara Working Group	11/11/2021, Email	29/11/2021, Email	Thank you for your ACHA for 34802 Keyhole Lands. Aboriginal people have managed the land and cared for it for tens of thousands of years and continue to do so. We have a deep connection with the

No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
				<p>land, water and sky this connection guides us when walking the land, we are one with mother nature. There are tangible, intangible, and aesthetic aspects that our culture depends on, we must take theses into account when doing an assessment of the land. By acknowledging stories and creation stories of the land we work on today and continuing the connection to country through interpretation and passing on this knowledge. We follow the water ways as a giver of life without them we are not here; over the last two hundred years we have lost many water ways due to the arrival of Europeans who have destroyed such water ways due to miss managed land causing catastrophic damage to ecosystems. Major waterways within the area are Ready Creek, Eastern Creek, and Ropes Creek that created a wet land that supply rich resources such as food and medicine.</p> <p>We must also consider practices that have taken place by Aboriginal people to care for country, fire management being a well-known tool of Aboriginal people to manage the landscape, creating ecosystems that today we may not see due to climate change and miss management by the Europeans. Aboriginal people have the knowledge of the land and how ecosystems work they recognised this and created landscapes that suited them and provide resource rich environments. We must also consider burials within the area as Aboriginal people were majorly affected by colonisation and suffered from disposition of their land making it hard to be aware of where their burials are today.</p> <p>Our modern history that we must consider the last two hundred years has affected Aboriginal people dramatically and we are thriving considering the disposition and effects of colonization. Aboriginal cultural groups come from all over NSW, as Aboriginal people were moved due to the</p>



No.	Organisation contacted	Date and type of contact	Date and type of response	Response details
				<p>stolen generation, this suggest that there are many cultural groups in this area. Today Aboriginal people come from all over Sydney not just one cultural group and we continue to thrive and excel moving forward.</p> <p>We would like to recommend a cultural interpretation plan for this project to educate the wider community and continuing the passing down of knowledge to our younger generations. This can be achieved through native landscaping, edible gardens, art, digital displays, sound scape, water features, with in your design and much more. We would like to agree to your recommendation, and we support your ACHA, we look forward to working alongside you on this project.</p>
12	Murra Bidgee Mullangari Aboriginal Corporation	11/11/2021, Email	17/11/2021, Email	I have read the project information and ACHA for the above project, I endorse the recommendations made.
13	Confidential party no.2	11/11/2021, Email	-	-
14	Tocomwall	11/11/2021, Email	-	-
15	Waawaar Awaa Aboriginal Corporation	11/11/2021, Email	-	-
16	Widescope Indigenous Group	11/11/2021, Email	-	-
17	Yurrandaali	11/11/2021, Email	-	-
18	Deerubbin Local Aboriginal Land Council	11/11/2021, Email	-	-

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

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**From:** Caitlin McManus  
**Sent:** Wednesday, 23 June 2021 9:46 AM  
**To:** 'mail@fairfieldcity.nsw.gov.au'  
**Subject:** 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies  
**Attachments:** 34802.Stage.1.Notification.to.Agencies.pdf

Good Morning,

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

Biosis is assisting Frasers Property with consultation with the Aboriginal community to inform the ACHA. Biosis is seeking to identify Aboriginal people who may have an interest in the study area.

If you could please provide contact details for any such Aboriginal people or organisations by 5:00 pm 7 July 2021 it would be greatly appreciated.

Thank you



**From:** Caitlin McManus  
**Sent:** Wednesday, 23 June 2021 9:46 AM  
**To:** 'admin.greatersydney@lls.nsw.gov.au'  
**Subject:** 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies  
**Attachments:** 34802.Stage.1.Notification.to.Agencies.pdf

Good Morning,

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

Biosis is assisting Frasers Property with consultation with the Aboriginal community to inform the ACHA. Biosis is seeking to identify Aboriginal people who may have an interest in the study area.

If you could please provide contact details for any such Aboriginal people or organisations by 5:00 pm 7 July 2021 it would be greatly appreciated.

Thank you

**From:** Caitlin McManus  
**Sent:** Wednesday, 23 June 2021 9:46 AM  
**To:** 'heritagemailbox@environment.nsw.gov.au'  
**Subject:** 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies  
**Attachments:** 34802.Stage.1.Notification.to.Agencies.pdf

Good Morning,

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

Biosis is assisting Frasers Property with consultation with the Aboriginal community to inform the ACHA. Biosis is seeking to identify Aboriginal people who may have an interest in the study area.

If you could please provide contact details for any such Aboriginal people or organisations by 5:00 pm 7 July 2021 it would be greatly appreciated.

Thank you

**From:** Caitlin McManus  
**Sent:** Wednesday, 23 June 2021 9:46 AM  
**To:** 'adminofficer@oralra.nsw.gov.au'  
**Subject:** 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies  
**Attachments:** 34802.Stage.1.Notification.to.Agencies.pdf

Good Morning,

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

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Thank you



**From:** Caitlin McManus  
**Sent:** Wednesday, 23 June 2021 9:46 AM  
**To:** 'information@ntscorp.com.au'  
**Subject:** 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies  
**Attachments:** 34802.Stage.1.Notification.to.Agencies.pdf

Good Morning,

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Thank you

**From:** Caitlin McManus  
**Sent:** Wednesday, 23 June 2021 9:43 AM  
**To:** 'staff@deerubbin.org.au'  
**Subject:** 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies  
**Attachments:** 34802.Stage.1.Notification.to.Agencies.pdf

Good Morning,

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

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Biosis wish to invite Deerubbin Local Aboriginal Land Council to register an interest in the project. Biosis is also seeking to identify Aboriginal people who may have an interest in the study area.

If you could please provide contact details for any such Aboriginal people or organisations by 5:00 pm 7 July 2021 it would be greatly appreciated.

Thank you

**From:** Caitlin McManus  
**Sent:** Wednesday, 23 June 2021 9:51 AM  
**To:** 'GeospatialSearch@NNTT.gov.au'; 'enquiries@nntt.gov.au'  
**Subject:** 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies  
**Attachments:** 34802.Stage.1.Notification.to.Agencies.pdf; 34802.Geospatial.search.20210616.pdf

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Thank you

**Caitlin McManus**  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



**Leaders in Ecology and Heritage Consulting**

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

The information transmitted including attachments is intended only for the person or entity to which it is addressed and may contain copyright material, or information that is confidential or is exempt from disclosure by law. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is strictly prohibited. If you received this in error, please contact the sender and delete the material from your computer. The views expressed in this email are those of the sender except where the sender expressly and with authority states them to be the views of Biosis Pty Ltd. Biosis Pty Ltd does not represent that this email is free of errors, viruses or interference. When using email to communicate with Biosis Pty Ltd, access to that information by Biosis Pty Ltd personnel is strictly limited and controlled.



23 June 2021

National Native Title Tribunal  
GPO Box 9973  
Sydney NSW 2001

Dear Sir or Madam,

**RE: Keyhole Lands Project: Aboriginal Cultural Heritage Assessment,  
Notification to Agencies  
Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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

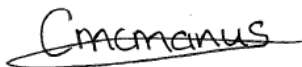
Frasers Property Industrial Pty Ltd  
Paul Solomon  
Planning and Infrastructure Manager  
Tel: (02) 9767 2951  
Email: [Paul.Solomon@frasersproperty.com.au](mailto:Paul.Solomon@frasersproperty.com.au)

All correspondence regarding provision of names and contact details of Aboriginal people who may hold cultural knowledge relevant to the study area should be provided in writing by **5:00 pm 7 July 2021** to:

**Maggie Butcher**  
Biosis Pty Ltd  
14/17-27 Power Avenue  
Alexandria  
mbutcher@biosis.com.au

If you have any queries regarding the project please don't hesitate to contact Maggie Butcher on the details above, or alternatively the main office number on (02) 9101 8700.

Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant

23 June 2021

Native Title Services Corporation  
PO Box 2105  
Strawberry Hills NSW 2012

Dear Sir or Madam,

**RE: Keyhole Lands Project: Aboriginal Cultural Heritage Assessment,  
Notification to Agencies  
Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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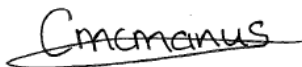
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Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant

23 June 2021

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

Dear Sir or Madam,

**RE: Keyhole Lands Project: Aboriginal Cultural Heritage Assessment,  
Notification to Agencies  
Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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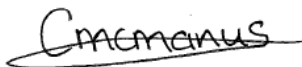
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Yours sincerely

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Caitlin McManus  
Research Assistant



23 June 2021

Heritage NSW  
PO Box 644  
Parramatta NSW 2124

Dear Sir or Madam,

**RE: Keyhole Lands Project: Aboriginal Cultural Heritage Assessment,  
Notification to Agencies  
Our Ref: Matter 34802**

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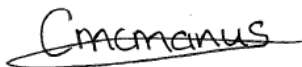
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Caitlin McManus  
Research Assistant

23 June 2021

Greater Sydney Local Land Services  
PO Box 600  
Wyong NSW 2259

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Notification to Agencies  
Our Ref: Matter 34802**

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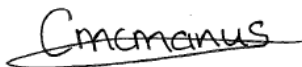
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Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant

23 June 2021

Fairfield City Council  
PO Box 21  
Fairfield NSW 1860

Dear Sir or Madam,

**RE: Keyhole Lands Project: Aboriginal Cultural Heritage Assessment,  
Notification to Agencies  
Our Ref: Matter 34802**

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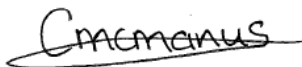
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Caitlin McManus  
Research Assistant



23 June 2021

Deerubbin LALC  
3/291-295 High Street  
Penrith NSW 2750

Dear Sir or Madam,

**RE: Keyhole Lands Project: Aboriginal Cultural Heritage Assessment,  
Notification to Agencies  
Our Ref: Matter 34802**

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Email: Paul.Solomon@frasersproperty.com.au

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Biosis Pty Ltd  
Sydney Resource Group

Unit 14, 17-27 Power Avenue  
Alexandria NSW 2015

Phone: 02 9101 8700

ACN 006 175 097  
ABN 65 006 175 097

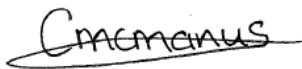
Email: [sydney@biosis.com.au](mailto:sydney@biosis.com.au)

[biosis.com.au](http://biosis.com.au)

**Maggie Butcher**  
Biosis Pty Ltd  
14/17-27 Power Avenue  
Alexandria  
mbutcher@biosis.com.au

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Yours sincerely



Caitlin McManus  
Research Assistant



## Request for Spatial Search of Tribunal Registers

### 1: Your details

Your name:	<i>Caitlin McManus</i>		
Your company:	<i>Biosis Pty Ltd</i>		
E-mail address:	<i>cmcmanus@biosis.com.au</i>	Phone:	<i>02 9101 8700</i>
Your reference:	<i>34802</i>	Your state:	<i>New South Wales</i>
<input checked="" type="checkbox"/>	<i>I have read and acknowledge the terms and conditions on the next page.</i>		

### 2: Areas to be searched

Jurisdiction to be searched:	<i>New South Wales</i>	Tenure to be searched:	<i>Non freehold parcel</i>
------------------------------	------------------------	------------------------	----------------------------

Parcel or tenement identifiers (add up to 20 separate identifiers). **Please see over for parcel identifiers.**

Parcel 1:	LOT 58B DP 17288	Parcel 2:	LOT 2 DP 505934
Parcel 3:	LOT 58A DP 17288	Parcel 4:	LOT 61B DP 17288
Parcel 5:	LOT 57 DP 13961	Parcel 6:	LOT A DP 347034
Parcel 7:	LOT 56 DP 13961	Parcel 8:	LOT B DP 347034
Parcel 9:	LOT A DP 361393	Parcel 10:	LOT 63 DP 13961
Parcel 11:	LOT B DP 361393	Parcel 12:	LOT 77 DP 13961
Parcel 13:	LOT 54 DP 13961	Parcel 14:	LOT 77 DP 13961
Parcel 15:	LOT 59B DP 362022	Parcel 16:	LOT A DP 357890
Parcel 17:	LOT 59A DP 362022	Parcel 18:	LOT 74B DP 17288
Parcel 19:	LOT 1 DP 505934	Parcel 20:	LOT 74A DP 17288 n

If your search area is not a parcel or mining or petroleum tenement, you can enter other tenure or administrative regions here (e.g. local government area, townsite or county). Please provide as much detail as you can.

Please include the below lots as well

LOT 78B DP 347873

LOT 79A DP 17288

LOT 79B DP 17288

LOT 1 DP 849699

LOT 81A DP 348110

LOT 81B DP 348110

LOT C DP 398446

LOT D DP 398446

LOT A DP 394855

LOT B DP 394855



E-mail the completed form to [GeospatialSearch@NNTT.gov.au](mailto:GeospatialSearch@NNTT.gov.au)

## Parcel Identifiers

In most jurisdictions please identify parcels using lot on plan, or lot/section/plan as appropriate. The NNTT is generally not able to identify parcels using land title information. Where possible, the NNTT uses the terminology and formatting of unique identifiers used in each state to uniquely identify a land parcel. More details are below:

1. **Lot on plan.** Use for Western Australia and Queensland.
2. **Lot/Section/Plan.** Use for New South Wales.
3. **LAISKEY.** Use for the Northern Territory. The laiskey is a unique identifier for each parcel comprised of the location code, LTO code (derived from the survey plan) where applicable and the parcel number.
4. **Parcel ID** – Use for South Australia. Concatenation of Parcel Type, Parcel, Plan Type and Plan.
5. **SPI** (Standard Parcel Identifier) – Use for Victoria.

## Terms and Conditions

1. Specify only one jurisdiction (e.g. Queensland) and one type of tenure (e.g. mining tenement) per form. You can add up to 20 separate tenements or parcels per search request. For more than 20 parcels or tenements please submit additional search requests or contact [GeospatialSearch@NNTT.gov.au](mailto:GeospatialSearch@NNTT.gov.au) to discuss your requirements.

Note: if your area of interest cannot be clearly identified from the search form, or is not held in NNTT datasets, we may instead provide search results for a surrounding local government area, or other suitable regional area.

2. Freehold land.

Under the Native Title Act 1993 (Cth), the valid grant of a freehold estate (other than certain types of Aboriginal and Torres Strait Islander land) on or before 23 December 1996 is known as a 'previous exclusive possession act'. This means that native title has been extinguished over the area. Native title claimants are not allowed to include land and waters covered by previous exclusive possession acts in their applications; therefore they would normally exclude freehold areas. A native title application may, however, be made over freehold land on the basis that freehold was invalidly granted, but the chances of this happening are very low.

3. Cultural Heritage in NSW.

The National Native Title Tribunal has undertaken steps to remove itself from the formal list of sources for information about indigenous groups in development areas. The existence or otherwise of native title is quite separate to any matters relating to Aboriginal cultural heritage. Information on native title claims, native title determinations and Indigenous Land Use Agreements is available on the Tribunal's website.

4. Spatial searches rely on data obtained from the relevant custodian. Whilst efforts are taken to update such datasets on a regular basis, the collection and interpretation of such datasets may be influenced by a number of factors that can impact of the completeness and accuracy of your search results.

## Disclaimer

While the National Native Title Tribunal (NNTT) and the Native Title Registrar (Registrar) have exercised due care in ensuring the accuracy of the information provided, it is provided for general information only and on the understanding that neither the NNTT, the Registrar nor the Commonwealth of Australia is providing professional advice. Appropriate professional advice relevant to your circumstances should be sought rather than relying on the information provided. In addition, you must exercise your own judgment and carefully evaluate the information provided for accuracy, currency, completeness and relevance for the purpose for which it is to be used.

The information provided is often supplied by, or based on, data and information from external sources, therefore the NNTT and Registrar cannot guarantee that the information is accurate or up-to-date.

The NNTT and Registrar expressly disclaim any liability arising from the use of this information.

This information should not be relied upon in relation to any matters associated with cultural heritage.

**From:** Geospatial Search Requests <GeospatialSearch@NNTT.gov.au>  
**Sent:** Wednesday, 23 June 2021 12:44 PM  
**To:** Caitlin McManus  
**Subject:** RE: SR21/932 - 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

## UNCLASSIFIED

**Native title search – NSW Parcels – Multiple**  
**Your ref: 34802 - Our ref: SR21/932**

**Dear** Caitlin McManus,

Thank you for your search request received on 23 June 2021 in relation to the above area. Based on the records held by the National Native Title Tribunal as at 23 June 2021 it would appear that there are no Native Title Determination Applications, Determinations of Native Title, or Indigenous Land Use Agreements over the identified area.

### Search Results

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

- Schedule of Native Title Determination Applications
- Register of Native Title Claims
- Native Title Determinations
- Indigenous Land Use Agreements (Registered and notified)

At the time this search was carried out, there were **no relevant entries** in the above databases.

### Cadastral data as at: 01/02/2021

Parcel ID	Feature Area SqKm	Overlapping Native Title Feature				
1//DP505934	0.0272	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
1//DP849699	0.0489	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
2//DP505934	0.0178	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
54//DP13961	0.0319	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
56//DP13961	0.0306	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
57//DP13961	0.0289	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
58A//DP17288	0.0132	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
58B//DP17288	0.0132	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
59A//DP362022	0.0162	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
59B//DP362022	0.0162	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
61B//DP17288	0.0152	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
63//DP13961	0.0308	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	<u>No overlap</u>			0.00%
74A//DP17288	0.0192	Tenure	NNTT File	Name	Category	% Selected

			Number			Feature
		FREEHOLD	No overlap			0.00%
74B//DP17288	0.0179	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
77//DP13961	0.0344	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
78B//DP347873	0.0200	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
79A//DP17288	0.0200	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
79B//DP17288	0.0200	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
81A//DP348110	0.0219	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
81B//DP348110	0.0220	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
A//DP347034	0.0180	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
A//DP357890	0.0160	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
A//DP361393	0.0143	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
A//DP394855	0.0151	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
B//DP347034	0.0163	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
B//DP361393	0.0186	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
B//DP394855	0.0191	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
C//DP398446	0.0098	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%
D//DP398446	0.0102	Tenure	NNTT File Number	Name	Category	% Selected Feature
		FREEHOLD	No overlap			0.00%

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

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

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

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

#### Search results and the existence of native title

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

#### The Tribunal accepts no liability for reliance placed on enclosed information

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

accepts no liability for use of the information or reliance placed on it.

### ***Cultural Heritage Searches in NSW***

The National Native Title Tribunal (the Tribunal) has undertaken steps to remove itself from the formal list of sources for information about indigenous groups in development areas. The existence or otherwise of native title is quite separate to any matters relating to Aboriginal cultural heritage. Information on native title claims, native title determinations and Indigenous Land Use Agreements is available on the Tribunal's website.

Interested parties are invited to use Native Title Vision (NTV) the Tribunal's online mapping system to discover native title matters in their area of interest. Access to NTV is available at <http://www.nntt.gov.au/assistance/Geospatial/Pages/NTV.aspx>. Training and self-help documents are available on the NTV web page under "Training and help documents". For additional assistance or general advice on NTV please contact [GeospatialSearch@NNTT.gov.au](mailto:GeospatialSearch@NNTT.gov.au)

Additional information can be extracted from the Registers available at <http://www.nntt.gov.au/searchRegApps/Pages/default.aspx>

If you have any further queries, please do not hesitate to contact us via [GeospatialSearch@NNTT.gov.au](mailto:GeospatialSearch@NNTT.gov.au)

Regards,

### **Geospatial Searches**

#### **National Native Title Tribunal | Perth**

Email: [GeospatialSearch@nntt.gov.au](mailto:GeospatialSearch@nntt.gov.au) | [www.nntt.gov.au](http://www.nntt.gov.au)

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**From:** Caitlin McManus <CMcManus@biosis.com.au>

**Sent:** Wednesday, 23 June 2021 7:52 AM

**To:** Geospatial Search Requests <GeospatialSearch@NNTT.gov.au>; Enquiries <Enquiries@nntt.gov.au>

**Subject:** SR21/932 - 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies

Caution: This is an external email. DO NOT click links or open attachments unless you recognise the sender and know the content is safe.

Good Morning,

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

Biosis is assisting Frasers Property with consultation with the Aboriginal community to inform the ACHA. Biosis is seeking to identify Aboriginal people who may have an interest in the study area.

If you could please provide contact details for any such Aboriginal people or organisations by 5:00 pm **7 July 2021** it would be greatly appreciated.

Thank you

### **Caitlin McManus**

Research Assistant - Heritage

M: 0438 537 634

D: (02) 9101 8726

E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



**Leaders in Ecology and Heritage Consulting**

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

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**From:** LLS Admin GreaterSydney Mailbox <admin.greatersydney@lls.nsw.gov.au>  
**Sent:** Thursday, 24 June 2021 11:40 AM  
**To:** Caitlin McManus  
**Subject:** Re: 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies

Dear Ms McManus

Thank you for your recent letter seeking assistance to identify Aboriginal stakeholder organisations and persons who may hold an interest in Country at the project area designated in your correspondence.

Greater Sydney Local Land Services (GS LLS) acknowledges that Local Land Services (formerly as Catchment Management Authorities) has been listed in Section 4.1.3.(g) of the Aboriginal Cultural Heritage Consultation requirements for proponents 2010, to support Part 6, of the NSW National Parks and Wildlife Act 1974 as a source of information to obtain the 'names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places'.

GS LLS understands and respects the significant role and values that tangible and intangible Aboriginal Cultural Heritage holds for First Nations/Aboriginal people with Country. GS LLS also partners with many First Nations communities on Caring for Country projects that aim to protect and enhance those tangible and intangible values in Country including Aboriginal Cultural Heritage. GS LLS considers Aboriginal Cultural Heritage matters in relation to its role in land management and considers cultural heritage issues in the context of Natural Resource Management.

However, GS LLS feels that it is not a primary source of contact for First Nations (Aboriginal) communities or persons that may inform or provide comment on development or planning issues.

GS LLS strongly recommends you contact Heritage NSW to seek their advice on all-inclusive contact lists of persons and organisations who 'speak for Country' and that may assist with your investigation.

Kind regards

**Customer Service Team**

**Greater Sydney Local Land Services**

Level 4, 2 - 6 Station St Penrith | PO Box 4515, Westfield Penrith NSW 2750

**T:** 02 4724 2100

**E:** [gs.service@lls.nsw.gov.au](mailto:gs.service@lls.nsw.gov.au) | **W:** [www.greatersydney.lls.nsw.gov.au](http://www.greatersydney.lls.nsw.gov.au)

You can also get in touch with us is through our [online enquiry form](#)



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**From:** Caitlin McManus <CMcManus@biosis.com.au>  
**Sent:** Wednesday, 23 June 2021 9:46 AM  
**To:** LLS Admin GreaterSydney Mailbox <admin.greatersydney@lls.nsw.gov.au>  
**Subject:** 34802 - Keyhole Lands Project: Stage 1 Notification to Agencies  
Good Morning,

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

Biosis is assisting Frasers Property with consultation with the Aboriginal community to inform the ACHA. Biosis is seeking to identify Aboriginal people who may have an interest in the study area.

If you could please provide contact details for any such Aboriginal people or organisations by 5:00 pm 7 July 2021 it would be greatly appreciated.

Thank you

**Caitlin McManus**  
Research Assistant - Heritage

M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcm anus@biosis.com.au](mailto:cmcm anus@biosis.com.au)



**Leaders in Ecology and Heritage Consulting**

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

The information transmitted including attachments is intended only for the person or entity to which it is addressed and may contain copyright material, or information that is confidential or is exempt from disclosure by law. Any review, retransmission, dissemination or other use of, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is strictly prohibited. If you received this in error, please contact the sender and delete the material from your computer. The views expressed in this email are those of the sender except where the sender expressly and with authority states them to be the views of Biosis Pty Ltd. Biosis Pty Ltd does not represent that this email is free of errors, viruses or interference. When using email to communicate with Biosis Pty Ltd, access to that information by Biosis Pty Ltd personnel is strictly limited and controlled.

## **LIST OF ABORIGINAL STAKEHOLDERS FOR THE DEPARTMENT of PREMIER and CABINET (DPC) SOUTHERN REGION HELD BY DPC FOR THE PURPOSES OF THE OEH ABORIGINAL CULTURAL HERITAGE CONSULTATION REQUIREMENTS FOR PROPONENTS 2010**

These lists are provided to proponents in accordance with section 4.1.2 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (the "Consultation Requirements") which commenced on 12 April 2010.

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

A copy of the Consultation Requirements can be found on the OEH website at:

<http://www.environment.nsw.gov.au/resources/cultureheritage/commconsultation/09781ACHconsultreq.pdf>.

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

The Consultation Requirements also state that:

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

- *continue to maintain a deep respect for their ancestral belief system, traditional lore and custom*
- *recognise their responsibilities and obligations to protect and conserve their culture and heritage and care for their traditional lands or Country*
- *have the trust of their community, knowledge and understanding of their culture, and permission to speak about it.*

Please note: the placement of an organisation's name on any OEH Aboriginal stakeholder list for the Consultation Requirements does not override a proponent's requirement to also advertise in the local newspaper and to seek from other sources the names of any other Aboriginal people who may hold cultural knowledge as required under clause 60 of the National Parks and Wildlife Regulation 2019.

### **How to use this list**

- 1. Contact the organisations/individuals who have indicated an interest in the relevant LGA/s and invite them to register an interest in your project**

**Do not reproduce the attached list in publicly available reports and other documents. Your report should only contain the names of the organisations and individuals who you have invited to register an interest in your project and those who have registered as stakeholders for your project.**

**Last updated 1 June 2021**

### Fairfield Local Government Area

Organisation/ Individual	Contact Name	Email Address/ Fax / Phone	Postal Address	Additional information
Deerubbin Local Aboriginal Land Council	Kevin Cavanagh	(02) 4724 5600 <a href="mailto:srandall@deerubbin.org.au">srandall@deerubbin.org.au</a> <a href="mailto:Reception@deerubbin.org.au">Reception@deerubbin.org.au</a> Fax: (02) 4722 9713	Level 1, Suite 3-291-295 High Street, Penrith NSW 2750  PO Box 40, Penrith NSW 2751	
Gandangara Local Aboriginal Land Council	Melissa Williams CEO	(02) 96025280 <a href="mailto:mwilliams@glalc.org.au">mwilliams@glalc.org.au</a>		
Darug Custodian Aboriginal Corporation	Justine Coplin	<a href="mailto:justinecoplin@optusnet.com.au">justinecoplin@optusnet.com.au</a> 0414 962 766	PO Box 81, Windsor NSW 2756	
Darug Tribal Aboriginal Corporation	Dirk Smitt	02 9622 4081	PO Box 441, Blacktown NSW 2148	
Darug Aboriginal Cultural Heritage Assessments	Gordon Morton	02 9410 3665 or 0422 865 831	Unit 9, 6 Chapman Avenue, Chatswood, NSW 2067	
Darug Land Observations	Jamie Workman and Anna Workman	0418 494 951      0413 687 279 <a href="mailto:daruglandobservations@gmail.com">daruglandobservations@gmail.com</a>	PO Box 173, Ulladulla, NSW 2539	
Darug Aboriginal Land Care	Mark Dyer	<a href="mailto:markdyer2009@live.com.au">markdyer2009@live.com.au</a> 0428 714 242	PO Box 405 Donnside 2767 NSW	
A1 Indigenous Services	Carolyn Hickey	0411 650 057 <a href="mailto:cazadirect@live.com">cazadirect@live.com</a>	10 Marie Pitt Place Glenmore Park 2745 NSW.	
Gunjeewong Cultural Heritage Aboriginal Corporation	Cherie Carroll Turrise	0438 428 805      0460696959 <a href="mailto:GunjeewongAboriginal11@hotmail.com">GunjeewongAboriginal11@hotmail.com</a>	1 Bellvue Place, Portland NSW, 2847	
Corroboree Aboriginal Corporation	Marilyn Carroll-Johnson	0415911159 <a href="mailto:corroboreecorp@bigpond.com">corroboreecorp@bigpond.com</a>	PO Box 3340, Rouse Hill, NSW 2155	



Murra Bidgee Mullangari Aboriginal Corporation	Darleen Johnson Ryan Johnson	0490 051 102 0475565517 <a href="mailto:murrabidgeemullangari@yahoo.com.au">murrabidgeemullangari@yahoo.com.au</a>	PO Box 3035 Rouse Hill NSW 2765	
Muragadi Heritage Indigenous Corporation	Jesse Johnson	0447 970 049 <a href="mailto:muragadi@yahoo.com.au">muragadi@yahoo.com.au</a>	5 Hession Road, Nelson, NSW 2765	
Kamilaroi Yankuntjatjara Working Group	Phil Khan	0434 545 982 <a href="mailto:philipkhan.acn@live.com.au">philipkhan.acn@live.com.au</a>	78 Forbes Street, Emu Plains, NSW 2750	
Wurrumay Pty Ltd	Kerrie Slater and Vicky Slater	0421077521 <a href="mailto:wurrumay@hotmail.com">wurrumay@hotmail.com</a>	89 Pyramid street, Emu Plains NSW 2750	
Warragil Cultural Services	Aaron Slater (Manager)	0481 280 067 <a href="mailto:Warragil_c.s@hotmail.com">Warragil_c.s@hotmail.com</a>		
Tocomwall	Scott Franks	0404 171 544	Po box 145, Miranda NSW 1490	
Amanda Hickey Cultural Services	Amanda Hickey	0434 480 588 <a href="mailto:amandahickey@live.com.au">amandahickey@live.com.au</a>	57 Gough st emu plains 2750	
Widescope Indigenous Group	Steven Hickey and Donna Hickey	0425 230 693 (Steven) 0425 232 056 (Donna)	73 Russell Street, Emu Plains, NSW 2750	
Dhinawan Culture & Heritage Pty Ltd	Stephen Fields	0411232285 <a href="mailto:dhinawan.ch@gmail.com">dhinawan.ch@gmail.com</a>		
HSB Consultants	Patricia Hampton	0424 142 216	62 Ropes Crossing Boulevard, Ropes Crossing 2760	
Rane Consulting	Tony Williams	02 88246991 <a href="mailto:ajw1901@bigpond.com">ajw1901@bigpond.com</a>	1 Pyrenees Way Beaumont Hills NSW 2155	
Anthony Williams	Anthony Williams	0456 399 687		
Gunyu	Kylie Ann Bell	<a href="mailto:gunyuuchts@gmail.com">gunyuuchts@gmail.com</a>		

Walbunja	Hika Te Kowhai	0402 730 612 <a href="mailto:walbunja@gmail.com">walbunja@gmail.com</a>		
Badu	Karia Lea Bond	0476 381 207	11 Jeffery Place, Moruya, NSW 2537	
Goobah Developments	Basil Smith	0405 995 725 <a href="mailto:goobahchts@gmail.com">goobahchts@gmail.com</a>	66 Grantham Road, Batehaven NSW, 2536	
Wullung	Lee-Roy James Boota	0403 703 942	54 Blackwood Street, Gerringong, NSW, 2534	
Yerramurra	Robert Parson	<a href="mailto:yerramurra@gmail.com">yerramurra@gmail.com</a>		
Nundagurri	Newton Carriage	<a href="mailto:nundagurri@gmail.com">nundagurri@gmail.com</a>		
Murrumbul	Mark Henry	<a href="mailto:murrumbul@gmail.com">murrumbul@gmail.com</a>		
Jerringong	Joanne Anne Stewart	0422 800 184 <a href="mailto:jerringong@gmail.com">jerringong@gmail.com</a>		
Pemulwuy CHTS	Pemulwuy Johnson	0425 066 100 <a href="mailto:pemulwuyd@gmail.com">pemulwuyd@gmail.com</a>	14 Top Place, Mt Annan	
Bilinga	Simalene Carriage	<a href="mailto:bilingachts@gmail.com">bilingachts@gmail.com</a>		
Munyunga	Kaya Dawn Bell	<a href="mailto:munyangachts@gmail.com">munyangachts@gmail.com</a>		
Wingikara	Hayley Bell	<a href="mailto:wingikarachts@gmail.com">wingikarachts@gmail.com</a>		
Minnamunnung	Aaron Broad	0402 526 888	1 Waratah Avenue, Albion Park Rail NSW 2527	
Walgalu	Ronald Stewart	<a href="mailto:walgaluchts@gmail.com">walgaluchts@gmail.com</a>		
Thauaira	Shane Carriage	<a href="mailto:thauairachts@gmail.com">thauairachts@gmail.com</a>		
Dharug	Andrew Bond	<a href="mailto:dharugchts@gmail.com">dharugchts@gmail.com</a>		
Gulaga	Wendy Smith	<a href="mailto:gulagachts@gmail.com">gulagachts@gmail.com</a>		
Biamanga	Seli Storer	<a href="mailto:biamangachts@gmail.com">biamangachts@gmail.com</a>		
Callendulla	Corey Smith	<a href="mailto:cullendullachts@gmail.com">cullendullachts@gmail.com</a>		

Murramarang	Roxanne Smith	<a href="mailto:murramarangchts@gmail.com">murramarangchts@gmail.com</a>		
Guntawang Aboriginal Resources Incorporated	Wendy Morgan	<a href="mailto:Wenlissa01@hotmail.com">Wenlissa01@hotmail.com</a> 0414 964 657 9601 7183	113 Reservoir Road Mt Pritchard NSW 2170	
Butucarbin Aboriginal Corporation	Jennifer Beale	(02)9832 7167 <a href="mailto:butuheritage@gmail.com">butuheritage@gmail.com</a>	PO Box E18, Emerton, NSW 2770	
Didge Ngunawal Clan	Lillie Carroll Paul Boyd	0426 823 944 <a href="mailto:didgengunawalclan@yahoo.com.au">didgengunawalclan@yahoo.com.au</a>	33 Carlyle Crescent Cambridge Gardens NSW 2747	
Ginninderra Aboriginal Corporation	Steven Johnson and Krystle Carroll	0406991221 <a href="mailto:Ginninderra.corp@gmail.com">Ginninderra.corp@gmail.com</a>	PO BOX 3143 Grose Vale NSW 2754	
Wailwan Aboriginal Group	Philip Boney	0436 483 210 <a href="mailto:waarian12@outlook.com">waarian12@outlook.com</a>		
Yulay Cultural Services	Arika Jalomaki (Manager)	<a href="mailto:yulayculturalservices@gmail.com">yulayculturalservices@gmail.com</a> 0481 251 385	28 Poplar Street North St Mary's NSW 2760	
Thoorga Nura	John Carriage (Chief Executive Officer)	0401 641 299 <a href="mailto:thoorganura@gmail.com">thoorganura@gmail.com</a>	50B Hilltop Crescent, Surf Beach, 2536, NSW	
Waawaar Awaa Aboriginal Corporation	Rodney Gunther Barry Gunther	Rodney Gunther – 0410580962 Barry Gunther – 0451 176 473 <a href="mailto:Waawaar.awaa@gmail.com">Waawaar.awaa@gmail.com</a>	15 Bungonia Street Prestons NSW 2170	
Barraby Cultural Services	Lee Field (Manager)	0431 314 892 <a href="mailto:barrabyculturalservices@gmail.com">barrabyculturalservices@gmail.com</a>	10B Elphin Street, Tahmoor NSW 2573	
Yurrandaali	Bo Field (Manager)	0403 048 263 <a href="mailto:yurrandaali_cs@hotmail.com">yurrandaali_cs@hotmail.com</a>	6 Macgibbon Parade, Old Erawal Bay NSW 2540	
Darug Boorooberongal Elders Aboriginal Corporation	Paul Hand (chairperson)	0456786738 <a href="mailto:paulhand1967@gmail.com">paulhand1967@gmail.com</a>	PO.Box 14 Doonside NSW 2767	

Ngambaa Cultural Connections	Kaarina Slater	0422 729 117 <a href="mailto:ngambaaculturalconnections@hotmail.com">ngambaaculturalconnections@hotmail.com</a>	6 Natchez Cresent, Greenfield Park NSW 2176	
Goodradigbee Cultural & Heritage Aboriginal Corporation,	Caine Carroll	0410974236 <a href="mailto:goodradigbee1@outlook.com">goodradigbee1@outlook.com</a>	<a href="#">1 Morilla Road, East Kurrajong NSW 2758</a>	
Mura Indigenous Corporation,	Phillip Carroll	0448824188 <a href="mailto:mura.indigenous@bigpond.com">mura.indigenous@bigpond.com</a>	<a href="#">11 Nargal Street Flinders NSW 2529</a>	
Aragung Aboriginal Cultural Heritage Site Assessments	Jamie Eastwood	0427793334 0298323732 <a href="mailto:James.eastwood@y7mail.com">James.eastwood@y7mail.com</a>	<a href="#">33 Bulolo Drive Whalan NSW 2770</a>	
Waawaar Awaa Aboriginal Corporation	Rodney Gunther	0410580962 <a href="mailto:Waawaar.awaa@gmail.com">Waawaar.awaa@gmail.com</a>	15 Bungonia Street Prestons NSW 2170	
Clive Freeman	Clive Freeman	Mob:0437721481 Home Number: 02-44421117 <a href="mailto:clive.freeman@y7mail.com">clive.freeman@y7mail.com</a>	6 Dhugan Close Wreck Bay Aboriginal Community JBT 2540	
Galamaay Cultural Consultants (GCC)	Robert Slater	Mob:0401 871 526 <a href="mailto:galamaay@hotmail.com">galamaay@hotmail.com</a>	121 Robert Street, Tamworth NSW 2340	
Bidjawong Aboriginal Corporation	James Carroll	0433 224 324	PO Box 124, Round Corner, NSW 2158	
Wori Woilywa	Daniel Chalker	<a href="mailto:woriiwoilywa@gmail.com">woriiwoilywa@gmail.com</a> 0409006216	261 Mockingbird Rd Pheasants Nest NSW 2574	
Gilay Consultants	Carol Slater	0478583565 <a href="mailto:cal.slater61@gmail.com">cal.slater61@gmail.com</a>	6 MacGibbon Parade, Old Erowal Bay NSW 2540	
Ngunawal Heritage Aboriginal Corporation	Dean Delponte - Director	<a href="mailto:ngunawalhac@gmail.com">ngunawalhac@gmail.com</a> 0413186133	245 Ash Road Prestons NSW 2170	



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Email: [hr@hix.com.au](mailto:hr@hix.com.au)



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### Public Notices



**PROPOSAL TO UPGRADE VODAFONE MOBILE PHONE  
BASE STATION AT BONNYRIGG INCLUDING 5G**  
2291 Bonnyrigg: 5 Rigg Place, Bonnyrigg NSW 2177  
(RFNSA 2177001)

The proposed facility consists of the addition of new equipment and associated works, including 5G, as follows:

- Removal of existing Vodafone antennas and equipment
- Installation of three (3) panel antennas, 2.7m long, on the existing headframe
- Installation of three (3) panel antennas, 0.8m long, on the existing headframe
- Installation of ancillary equipment including fifteen (15) remote radio units, antenna mounts and cabling.

1. Vodafone regards the proposed installations as Low-impact Facilities under the Telecommunications (Low-impact Facilities) Determination 2018 ("The Determination"), or as Exempt Development under the SEPP (Infrastructure) 2007, based on the description above.

2. In accordance with Section 7 of C564:2020 Mobile Phone Base Station Deployment Code, we invite you to provide feedback about the proposal. Should you require further information or wish to comment, please contact Archie Aparicio at Avicom, 02 9495 9000, [community@avicom.com.au](mailto:community@avicom.com.au) or Level 1, 110 Pacific Highway, St Leonards NSW 2065 by **Thursday, 29 July 2021**. Further information may also be obtained from [www.rfnsa.com.au/2177001](http://www.rfnsa.com.au/2177001).



**PROPOSAL TO UPGRADE EXISTING  
MOBILE PHONE BASE STATION  
WITH 5G AT THE FOLLOWING LOCATION**  
430-482 Smithfield Rd, Prairiewood NSW 2176  
[www.rfnsa.com.au/2176003](http://www.rfnsa.com.au/2176003)

- The proposed upgrade to the existing facility consists of the following works, replacement of three (3) existing panel antennas (each no longer than 2.8m), installation of nine (9) new 5G panel antennas (each no longer than 0.81m) and associated ancillary equipment including twenty-one (21) new Remote Radio Units and two (2) new GPS antennas, reconfiguration of existing equipment on the facility and within the equipment shelter and removal of existing Remote Radio Units and a GPS antenna.

Optus and Vodafone regard the proposed installation as a Low-impact Facility under the Telecommunications (Low-impact Facilities) Determination 2018 ("The Determination") based on the description above.

In accordance with Section 7 of C564:2020 Mobile Phone Base Station Deployment Code, we invite you to provide feedback about the proposal. Further information and/or comments should be directed to: BMM Group, 1300 260 834, [submissions@bmmgroup.com.au](mailto:submissions@bmmgroup.com.au) by 29 July 2021. Further information may also be obtained from the website provided above.

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### Public Notices



**PROPOSAL TO UPGRADE EXISTING MOBILE PHONE  
BASE STATION WITH 5G AT 673 - 683 SMITHFIELD  
ROAD, EDENSOR PARK NSW - 2176**

1. The proposed upgrade to the existing facility involves:

- Installation of Three (3) new Vodafone and Three (3) Optus 5G panel antennas not more than 2.8m in length to be located on the proposed new headframe;
- Replacement and reconfiguration of the existing Three (3) Vodafone panel antennas on proposed new headframe;
- Reconfiguration of existing and installation of new ancillary equipment, including steel works, RRUs, GPS antennas, cabling and other items associated with safety and operation of the facility; and
- Reconfiguration and installation of equipment within the existing equipment shelter.

2. Vodafone and Optus regards the proposed installation as Low Impact Facility under the Telecommunications (Low-impact Facilities) Determination 2018 ("The Determination") based on the description above.

3. In accordance with Section 7 of C564:2020 Mobile Phone Base Station Deployment Code, we invite you to provide feedback about the proposal. Should you require further information or wish to comment, please contact: Abhishek Gampala from Nokia Solutions & Networks on 0466 898 356 or at [communityrelations.vha@groups.nokia.com](mailto:communityrelations.vha@groups.nokia.com) COB Wednesday 28 July 2021. Further information may also be obtained from [www.rfnsa.com.au/2176010](http://www.rfnsa.com.au/2176010)

### Public Notices



**PROPOSAL TO UPGRADE OPTUS MOBILE  
PHONE BASE STATION AT**

121-133 Prairie Vale Road, Bossley Park NSW 2176 with 5G  
RFNSA reference: 2176004

1. The proposed facility consists of the addition of new 5G equipment and associated works as follows:

The removal of three (3) existing panel antennas, the installation of three (3) new panel antennas (2.7m long), and the installation of three (3) new panel antennas (0.59m long) onto the existing facility. Add Ancillary items including twelve (12) new remote radio units and in shelter works

2. Optus regards the proposed installation as a Low Impact Facility in accordance with the Telecommunications (Low-impact Facilities) Determination 2018 based on the description above

3. In accordance with Section 7 of C564:2020 Mobile Phone Base Station Deployment Code, we invite you to provide feedback about the proposal. Further information and/or comments should be directed to: Joel Stuart of Metasite at [Feedback@metasite.com.au](mailto:Feedback@metasite.com.au), or PO Box 31, Crows Nest NSW 1585, by **5pm on July 29th 2021**.



**PROPOSAL TO UPGRADE OPTUS MOBILE  
PHONE BASE STATION AT**

340 Victoria Street, Wetherill Park NSW 2164 with 5G  
RFNSA reference: 2164019

1. The proposed facility consists of the addition of new 5G equipment and associated works as follows:

The removal of four (4) existing panel antennas, the installation of five (5) new panel antennas (2.7m long), three (3) new panel antennas (0.81m long), three (3) new panel antennas (0.75m long), and three (3) new panel antennas (0.59m long) onto the existing rooftop facility

Ancillary items including removing seventeen (17) remote radio units and installing twenty-one (21) new remote radio units and in shelter works

2. Optus regards the proposed installation as a Low Impact Facility in accordance with the Telecommunications (Low-impact Facilities) Determination 2018 based on the description above

3. In accordance with Section 7 of C564:2020 Mobile Phone Base Station Deployment Code, we invite you to provide feedback about the proposal. Further information and/or comments should be directed to: Joel Stuart of Metasite at [Feedback@metasite.com.au](mailto:Feedback@metasite.com.au), or PO Box 31, Crows Nest NSW 1585, by **5pm on July 29th 2021**.

### NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS

Biosis is undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for the Keyhole Lands Project at Horsley Park Drive, Horsley Park, NSW, within the Deerubbin Local Government Area on behalf of Fraser Property Industrial (Paul Solomon, Email: [Paul.Solomon@frasersproperty.com.au](mailto:Paul.Solomon@frasersproperty.com.au), Ph: (02) 9767 2951).

Biosis invites Aboriginal people who hold cultural knowledge in determining the significance of Aboriginal object(s) and/or places in the vicinity of the above area to register their interest in a process of community consultation.

The purpose of Aboriginal community consultation is to assist Fraser Property Industrial in preparing an AHP application (if required) and to assist Heritage NSW, Department of Premier and Cabinet (Heritage NSW) in their consideration and determination of the application. The project will be undertaken in accordance with the National Parks and Wildlife Act 1974

To register an interest in this project please contact Maggie Butcher (Email: [mbutcher@biosis.com.au](mailto:mbutcher@biosis.com.au), Address: 14/17 Power Avenue, Alexandria NSW 2015, Tel: (02) 9101 8700).

Please note that the name of each group that registers for consultation on this project will be provided to Heritage NSW and the Local Aboriginal Land Council unless the group specifies that they do not want their details released.

**REGISTRATIONS MUST BE RECEIVED  
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8 July 2021

Yurrandaali  
Bo Field  
6 Macgibbon Parade, Old Errol Bay NSW 2540

Dear Bo ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis is assisting Fraser Property with consultation with the Aboriginal community to inform the ACHA. Consultation with the Aboriginal community for this assessment will be undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010) (consultation requirements).

The purpose of Aboriginal community consultation is to assist Fraser Property in the application of an Aboriginal Heritage Impact Permit (AHIP) for the project (if required); and to assist Heritage NSW, Department of Premier and Cabinet (Heritage NSW) in their consideration and determination of the application. The project will be undertaken in accordance with the *National Parks and Wildlife Act 1974*.

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

If you wish to register your interest please provide your contact details in writing via post or email by **5:00 pm 22 July 2021 to:**

**Maggie Butcher**  
Biosis Pty Ltd  
14/17-27 Power Avenue  
Alexandria  
mbutcher@biosis.com.au

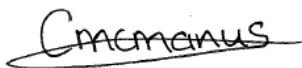
In accordance with section 4.1.3 (a) of the consultation requirements, the proponent details for this project are as follows:

Frasers Property Industrial Pty Ltd  
Paul Solomon  
Planning and Infrastructure Manager  
Tel: (02) 9767 2951  
Email: Paul.Solomon@frasersproperty.com.au

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

If you have any queries regarding the project please don't hesitate to contact Maggie Butcher on the details above, or alternatively the main office number on (02) 9101 8700.

Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant





8 July 2021

Yulay Cultural Services  
Arika Jalomaki  
28 Poplar Street North St Mary's NSW 2760

Dear Arika ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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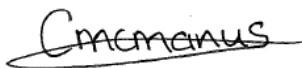
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If you have any queries regarding the project please don't hesitate to contact Maggie Butcher on the details above, or alternatively the main office number on (02) 9101 8700.

Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant



8 July 2021

Yerramurra  
Robert Parson

Dear Robert ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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The purpose of Aboriginal community consultation is to assist Fraser Property in the application of an Aboriginal Heritage Impact Permit (AHIP) for the project (if required); and to assist Heritage NSW, Department of Premier and Cabinet (Heritage NSW) in their consideration and determination of the application. The project will be undertaken in accordance with the *National Parks and Wildlife Act 1974*.

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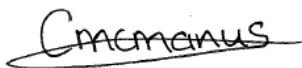
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If you have any queries regarding the project please don't hesitate to contact Maggie Butcher on the details above, or alternatively the main office number on (02) 9101 8700.

Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant



8 July 2021

Wurrumay Pty Ltd  
Kerrie & Vicky Slater  
89 Pyramid street, Emu Plains NSW 2750

Dear Kerrie & Vicky,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis is assisting Fraser Property with consultation with the Aboriginal community to inform the ACHA. Consultation with the Aboriginal community for this assessment will be undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010) (consultation requirements).

The purpose of Aboriginal community consultation is to assist Fraser Property in the application of an Aboriginal Heritage Impact Permit (AHIP) for the project (if required); and to assist Heritage NSW, Department of Premier and Cabinet (Heritage NSW) in their consideration and determination of the application. The project will be undertaken in accordance with the *National Parks and Wildlife Act 1974*.

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

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Biosis Pty Ltd  
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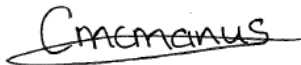
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Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant



8 July 2021

Wori Woilywa  
Daniel Chalker  
261 Mockingbird Rd Pheasants Nest NSW 2574

Dear Daniel,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis is assisting Fraser Property with consultation with the Aboriginal community to inform the ACHA. Consultation with the Aboriginal community for this assessment will be undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010) (consultation requirements).

The purpose of Aboriginal community consultation is to assist Fraser Property in the application of an Aboriginal Heritage Impact Permit (AHIP) for the project (if required); and to assist Heritage NSW, Department of Premier and Cabinet (Heritage NSW) in their consideration and determination of the application. The project will be undertaken in accordance with the *National Parks and Wildlife Act 1974*.

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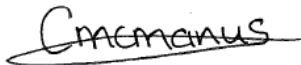
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If you have any queries regarding the project please don't hesitate to contact Maggie Butcher on the details above, or alternatively the main office number on (02) 9101 8700.

Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant



8 July 2021

Wingikara  
Hayley Bell

Dear Hayley ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis is assisting Fraser Property with consultation with the Aboriginal community to inform the ACHA. Consultation with the Aboriginal community for this assessment will be undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010) (consultation requirements).

The purpose of Aboriginal community consultation is to assist Fraser Property in the application of an Aboriginal Heritage Impact Permit (AHIP) for the project (if required); and to assist Heritage NSW, Department of Premier and Cabinet (Heritage NSW) in their consideration and determination of the application. The project will be undertaken in accordance with the *National Parks and Wildlife Act 1974*.

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

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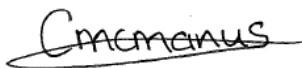
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Yours sincerely

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Caitlin McManus  
Research Assistant



8 July 2021

Widescope Indigenous Group  
Steven & Donna Hickey  
73 Russell Street, Emu Plains, NSW 2750

Dear Steven & Donna,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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Alexandria  
mbutcher@biosis.com.au

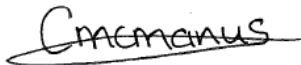
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Caitlin McManus  
Research Assistant



8 July 2021

Guntawang Aboriginal Resources Incorporated  
Wendy Morgan  
113 Reservoir Road Mt Pritchard NSW 2170

Dear Wendy ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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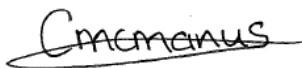
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Caitlin McManus  
Research Assistant



8 July 2021

Warragil Cultural Services  
Aaron Slater

Dear Aaron,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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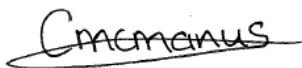
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Caitlin McManus  
Research Assistant



8 July 2021

Walgalu  
Ronald Stewart

Dear Ronald ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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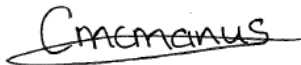
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Caitlin McManus  
Research Assistant



8 July 2021

Walbunja  
Hika Te Kowhai

Dear Hika Te Kowhai,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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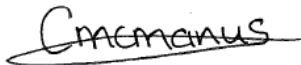
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Caitlin McManus  
Research Assistant

8 July 2021

Waawaar Awaa Aboriginal Corporation  
Rodney & Barry Gunther  
15 Bungonia Street Prestons NSW 2170

Dear Rodney & Barry,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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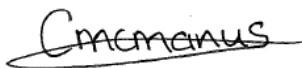
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8 July 2021

Wailwan Aboriginal Group  
Philip Boney

Dear Philip ,

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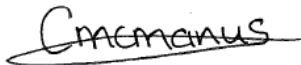
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Caitlin McManus  
Research Assistant



8 July 2021

Thoorga Nura  
John Carriage  
50B Hilltop Crescent, Surf Beach, 2536, NSW

Dear John ,

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**Our Ref: Matter 34802**

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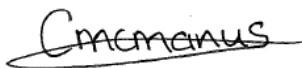
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Caitlin McManus  
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8 July 2021

Thauaira  
Shane Carriage

Dear Shane ,

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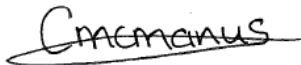
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8 July 2021

Deerubbin Local Aboriginal Land Council  
Kevin Cavanagh  
Level 1, Suite 3-291-295 High Street, Penrith NSW 2750  
PO Box 40, Penrith NSW 2751

Dear Kevin ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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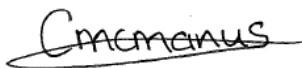
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8 July 2021

Pemulwuy CHTS  
Pemulwuy Johnson  
14 Top Place, Mt Annan

Dear Pemulwuy ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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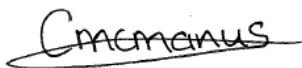
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Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant



8 July 2021

Darug Boorooberongal Elders Aboriginal Corporation  
Paul Hand  
PO.Box 14 Doonside NSW 2767

Dear Paul ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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14/17-27 Power Avenue  
Alexandria  
mbutcher@biosis.com.au

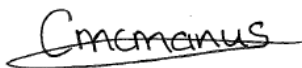
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Caitlin McManus  
Research Assistant





8 July 2021

Nundagurri  
Newton Carriage

Dear Newton ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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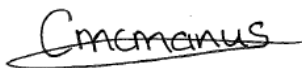
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Caitlin McManus  
Research Assistant



8 July 2021

Ngunawal Heritage Aboriginal Corporation  
Dean Delponte  
245 Ash Road Prestons NSW 2170

Dear Dean,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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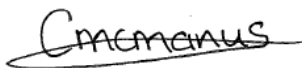
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Caitlin McManus  
Research Assistant



8 July 2021

Ngambaa Cultural Connections  
Kaarina Slater  
6 Natchez Crescent, Greenfield Park NSW 2176

Dear Kaarina ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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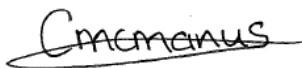
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Yours sincerely

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Caitlin McManus  
Research Assistant



8 July 2021

Gandangara Local Aboriginal Land Council  
Melissa Williams

Dear Melissa ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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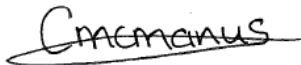
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Yours sincerely

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Caitlin McManus  
Research Assistant



8 July 2021

Murrumbul  
Mark Henry

Dear Mark ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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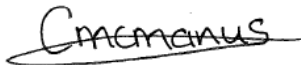
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Caitlin McManus  
Research Assistant





8 July 2021

Murramarang  
Roxanne Smith

Dear Roxanne ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
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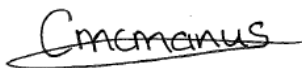
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Caitlin McManus  
Research Assistant



8 July 2021

Murra Bidgee Mullangari Aboriginal Corporation  
Darleen & Ryan Johnson  
PO Box 3035 Rouse Hill NSW 2765

Dear Darleen & Ryan,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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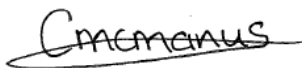
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Caitlin McManus  
Research Assistant



8 July 2021

Muragadi Heritage Indigenous Corporation  
Jesse Johnson  
5 Hession Road, Nelson, NSW 2765

Dear Jesse,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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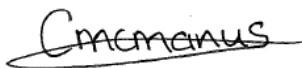
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Research Assistant



8 July 2021

Munyunga  
Kaya Dawn Bell

Dear Kaya Dawn ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
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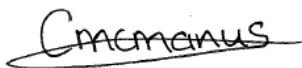
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Caitlin McManus  
Research Assistant



8 July 2021

Darug Aboriginal Land Care  
Mark Dyer  
PO Box 405 Donnside 2767 NSW

Dear Mark ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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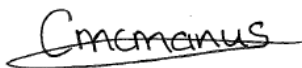
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Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant





8 July 2021

Darug Custodian Aboriginal Corporation  
Justine Coplin  
PO Box 81, Windsor NSW 2756

Dear Justine ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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Alexandria  
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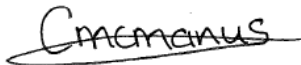
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Caitlin McManus  
Research Assistant



8 July 2021

Jerringong  
Joanne Anne Stewart

Dear Joanne Anne ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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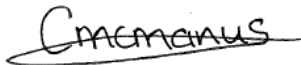
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Caitlin McManus  
Research Assistant



8 July 2021

Aragung Aboriginal Cultural Heritage Site Assessments  
Jamie Eastwood  
33 Bulolo Drive Whalan NSW 2770

Dear Jamie ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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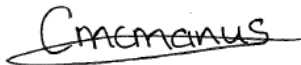
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Caitlin McManus  
Research Assistant



8 July 2021

Gunyuu  
Kylie Ann Bell

Dear Kylie Ann ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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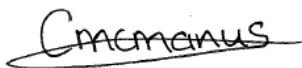
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Caitlin McManus  
Research Assistant



8 July 2021

Gunjeewong Cultural Heritage Aboriginal Corporation  
Cherie Carroll Turrise

Dear Cherie Carroll ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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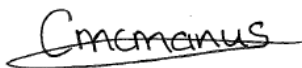
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Caitlin McManus  
Research Assistant





8 July 2021

Gulaga  
Wendy Smith

Dear Wendy ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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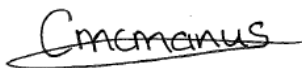
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Caitlin McManus  
Research Assistant



8 July 2021

Goodradigbee Cultural & Heritage Aboriginal Corporation,  
Caine Carroll  
1 Morilla Road, East Kurrajong NSW 2758

Dear Caine ,

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**Our Ref: Matter 34802**

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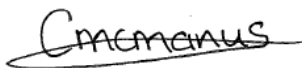
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Caitlin McManus  
Research Assistant



8 July 2021

Goobah Developments  
Basil Smith  
66 Grantham Road, Batehaven NSW, 2536

Dear Basil,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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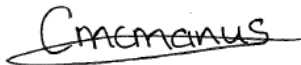
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Caitlin McManus  
Research Assistant



8 July 2021

Ginninderra Aboriginal Corporation  
Steven Johnson & Krystle Carroll  
PO BOX 3143 Grose Vale NSW 2754

Dear Steven Johnson & Krystle Carroll,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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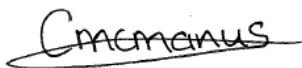
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Caitlin McManus  
Research Assistant



8 July 2021

Galamaay Cultural Consultants (GCC)  
Robert Slater  
121 Robert Street, Tamworth NSW 2340

Dear Robert ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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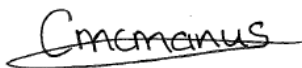
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Caitlin McManus  
Research Assistant





8 July 2021

Didge Ngunawal Clan  
Lillie Carrol & Paul Boyd  
33 Carlyle Crescent Cambridge Gardens NSW 2747

Dear Lillie Carrol & Paul Boyd,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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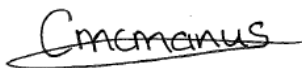
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Email: Paul.Solomon@frasersproperty.com.au

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Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant



8 July 2021

Dhinawan Culture & Heritage Pty Ltd  
Stephen Fields

Dear Stephen,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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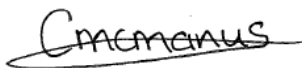
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Caitlin McManus  
Research Assistant



8 July 2021

Dharug  
Andrew Bond

Dear Andrew ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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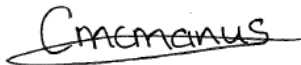
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Caitlin McManus  
Research Assistant



8 July 2021

Darug Land Observations  
Jamie & Anna Workman  
PO Box 173, Ulladulla, NSW 2539

Dear Jamie & Anna,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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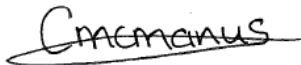
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Caitlin McManus  
Research Assistant



8 July 2021

Callendulla  
Corey Smith

Dear Corey ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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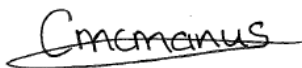
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Yours sincerely

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Caitlin McManus  
Research Assistant



8 July 2021

Corroboree Aboriginal Corporation  
Marilyn Carroll-Johnson  
PO Box 3340, Rouse Hill, NSW 2155

Dear Marilyn ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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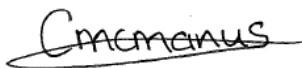
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Caitlin McManus  
Research Assistant

8 July 2021

Clive Freeman  
Clive Freeman  
6 Dhugan Close Wreck Bay Aboriginal Community JBT 2540

Dear Clive ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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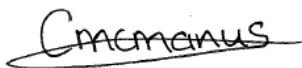
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Caitlin McManus  
Research Assistant



8 July 2021

A1 Indigenous Services  
Carolyn Hickey  
10 Marie Pitt Place Glenmore Park 2745 NSW.

Dear Carolyn ,

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**Our Ref: Matter 34802**

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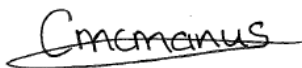
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Caitlin McManus  
Research Assistant



8 July 2021

Gilay Consultants  
Carol Slater  
6 MacGibbon Parade, Old Erowal Bay NSW 2540

Dear Carol ,

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**Our Ref: Matter 34802**

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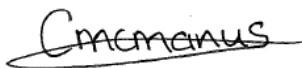
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Caitlin McManus  
Research Assistant



8 July 2021

Butucarbin Aboriginal Corporation  
Jennifer Beale  
PO Box E18, Emerton, NSW 2770

Dear Jennifer,

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**Our Ref: Matter 34802**

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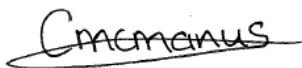
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Caitlin McManus  
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8 July 2021

Bilinga  
Simalene Carriage

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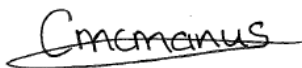
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Caitlin McManus  
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8 July 2021

Biamanga  
Seli Storer

Dear Seli ,

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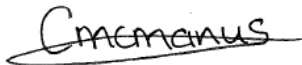
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Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant



8 July 2021

Barraby Cultural Services  
Lee Field  
10B Elphin Street, Tahmoor NSW 2573

Dear Lee ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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**Maggie Butcher**  
Biosis Pty Ltd  
14/17-27 Power Avenue  
Alexandria  
mbutcher@biosis.com.au

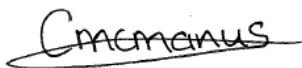
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Caitlin McManus  
Research Assistant



8 July 2021

Amanda Hickey Cultural Services  
Amanda Hickey  
57 Gough st emu plains 2750

Dear Amanda,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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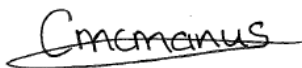
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Caitlin McManus  
Research Assistant



8 July 2021

Rane Consulting  
Tony Williams  
1 Pyrenees Way Beaumont Hills NSW 2155

Dear Tony ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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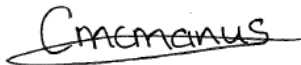
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Caitlin McManus  
Research Assistant



8 July 2021

Kamilaroi Yankuntjatjara Working Group  
Phil Khan  
78 Forbes Street, Emu Plains, NSW 2750

Dear Phil,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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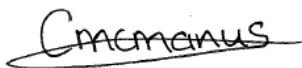
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Caitlin McManus  
Research Assistant



8 July 2021

Tocomwall  
Scott Franks  
Po box 145, Miranda NSW 1490

Dear Scott,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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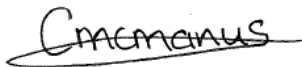
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Caitlin McManus  
Research Assistant



8 July 2021

Minnamunnung  
Aaron Broad  
1 Waratah Avenue, Albion Park Rail NSW 2527

Dear Aaron ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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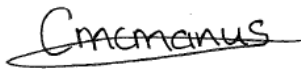
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Caitlin McManus  
Research Assistant



8 July 2021

Darug Tribal Aboriginal Corporation  
Dirk Smitt  
PO Box 441, Blacktown NSW 2148

Dear Dirk ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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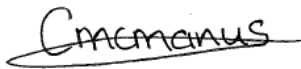
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Caitlin McManus  
Research Assistant



8 July 2021

HSB Consultants  
Patricia Hampton  
62 Ropes Crossing Boulevard, Ropes Crossing 2760

Dear Patricia ,

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**Our Ref: Matter 34802**

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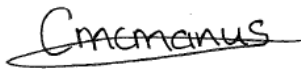
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Caitlin McManus  
Research Assistant



8 July 2021

Darug Aboriginal Cultural Heritage Assessments  
Gordon Morton  
Unit 9, 6 Chapman Avenue, Chatswood, NSW 2067

Dear Gordon ,

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**Our Ref: Matter 34802**

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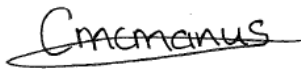
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Caitlin McManus  
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8 July 2021

Bidjawong Aboriginal Corporation  
James Carroll  
PO Box 124, Round Corner, NSW 2158

Dear James ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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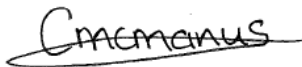
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Caitlin McManus  
Research Assistant



8 July 2021

Badu  
Karia Lea Bond Bond  
11 Jeffery Place, Moruya, NSW 2537

Dear Karia Lea Bond,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

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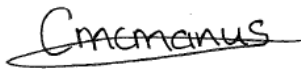
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Tel: (02) 9767 2951  
Email: Paul.Solomon@frasersproperty.com.au

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

If you have any queries regarding the project please don't hesitate to contact Maggie Butcher on the details above, or alternatively the main office number on (02) 9101 8700.

Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant



8 July 2021

Wullung  
Lee-Roy James Boota  
54 Blackwood Street, Gerringong, NSW, 2534

Dear Lee-Roy ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis is assisting Fraser Property with consultation with the Aboriginal community to inform the ACHA. Consultation with the Aboriginal community for this assessment will be undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010) (consultation requirements).

The purpose of Aboriginal community consultation is to assist Fraser Property in the application of an Aboriginal Heritage Impact Permit (AHIP) for the project (if required); and to assist Heritage NSW, Department of Premier and Cabinet (Heritage NSW) in their consideration and determination of the application. The project will be undertaken in accordance with the *National Parks and Wildlife Act 1974*.

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

If you wish to register your interest please provide your contact details in writing via post or email by **5:00 pm 22 July 2021 to:**

**Maggie Butcher**  
Biosis Pty Ltd  
14/17-27 Power Avenue  
Alexandria  
mbutcher@biosis.com.au



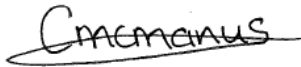
In accordance with section 4.1.3 (a) of the consultation requirements, the proponent details for this project are as follows:

Frasers Property Industrial Pty Ltd  
Paul Solomon  
Planning and Infrastructure Manager  
Tel: (02) 9767 2951  
Email: Paul.Solomon@frasersproperty.com.au

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

If you have any queries regarding the project please don't hesitate to contact Maggie Butcher on the details above, or alternatively the main office number on (02) 9101 8700.

Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant



8 July 2021

Anthony Williams  
Anthony Williams

Dear Anthony ,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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mbutcher@biosis.com.au

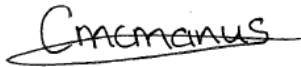
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Paul Solomon  
Planning and Infrastructure Manager  
Tel: (02) 9767 2951  
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Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant



8 July 2021

Mura Indigenous Corporation,  
Phillip Carroll  
11 Nargal Street Flinders NSW 2529

Dear Phillip,

**RE: Keyhole Lands – Invitation to Register for Aboriginal Community Consultation**  
**Our Ref: Matter 34802**

Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial Pty Ltd (Fraser Property) to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park New South Wales (NSW) (the project). The project is to be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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Alexandria  
mbutcher@biosis.com.au

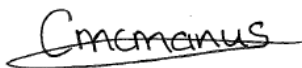
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Paul Solomon  
Planning and Infrastructure Manager  
Tel: (02) 9767 2951  
Email: Paul.Solomon@frasersproperty.com.au

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Yours sincerely

A handwritten signature in black ink that reads 'Cmcmanus'.

Caitlin McManus  
Research Assistant

## Ashleigh Keevers-Eastman

---

**From:** Carolyn .H <cazadirect@live.com>  
**Sent:** Friday, 9 July 2021 2:51 PM  
**To:** Maggie Butcher  
**Cc:** Paul.Solomon@frasersproperty.com.au  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 1 Invitation to Register  
**Attachments:** A1.WC2022.pdf; A1.PL2022.pdf



### INDIGENOUS SERVICES PTY LTD

Contact: Carolyn Hickey  
M: 0411650057  
E: Cazadirect@live.com  
A: 10 Marie Pitt Place, Glenmore Park, NSW 2745  
ACN: 639 868 876  
ABN: 31 639 868 876

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

I am a traditional custodian with over 20 years experience in helping preserve Aboriginal cultural heritage on projects.  
I hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and values that exist in the project area.

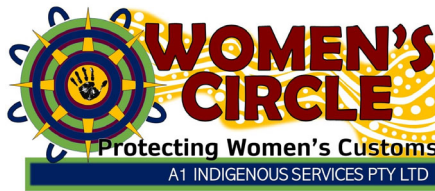
I have attached A1 Indigenous Services Insurances.

We would like the Proponent to consider including A1's, Kawalkan youth and the Women's Circle Employees for all future field work.



The Kawalkan Youth Program is a designed program created to employ young indigenous youths between the ages of (18-29) years of age.





The Women's Circle was created with the need to always have Experienced Indigenous Women present in all field work.

To aim for not only gender equality in the workplace but, to help identify and protect any women's sacred places.

### OUR MISSION

#### **Building strength in aboriginal families, communities, and services.**

It is our mission to commit to an innovative approach to a better future for indigenous employment.

Giving our people the opportunity to gain employment in a culturally sensitive work environment also giving them the opportunity to work on country and continue the tradition of protecting and passing down

**Cultural knowledge from one generation to the next – continuing the importance of keeping culture.**

Please feel free to contact me on details supplied

Kind Regards,  
Carolyn Hickey  
Managing Director

---

**From:** Caitlin McManus <CMcManus@biosis.com.au>

**Sent:** Thursday, 8 July 2021 12:48 PM

**To:** 'cazadirect@live.com' <cazadirect@live.com>

**Subject:** 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park NSW.

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If you wish to register your interest please provide your contact details in writing via post or email by 5:00 pm 22 July 2021.

If you have any queries regarding the project please don't hesitate to contact Maggie Butcher via email or phone.

Thank you

**Caitlin McManus**

Research Assistant - Heritage

M: 0438 537 634

D: (02) 9101 8726

E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



**Leaders in Ecology and Heritage Consulting**

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**From:** James Eastwood <james.eastwood@y7mail.com>  
**Sent:** Saturday, 10 July 2021 11:15 AM  
**To:** Caitlin McManus  
**Subject:** Registration

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

to

Good Morning Caitlin

Thank you for your recent emailed invitation to register for Aboriginal community Consultation regarding a Aboriginal Cultural Heritage Assessment for the proposed rezoning of ***Horsley Park Drive Horsley Park NSW.***

Aragung Aboriginal Cultural Heritage site Assessments is pleased to accept your invitation and would like to register as a Aboriginal stake Holder for this assessment.

Aragung would like to be updated to all aspects of this assessments and would like to be considered for engagement to participate in archaeological field work investigation should they be required.

kind regards

Aragung

Jamie Eastwood

**From:** Lee Field <barrabyculturalservices@gmail.com>  
**Sent:** Saturday, 17 July 2021 10:06 PM  
**To:** Caitlin McManus  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Dear Caitlin

Barraby Cultural Services would like to register for this project

Kind regards

Lee Field

On 8 Jul 2021, at 12:48 pm, Caitlin McManus <[CMcManus@biosis.com.au](mailto:CMcManus@biosis.com.au)> wrote:

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Thank you

**Caitlin McManus**  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)  
<[image0730d4.PNG](#)>  
Leaders in Ecology and Heritage Consulting

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<34802.Keyhole.Lands.Stage.1..pdf>



## **BUTUCARBIN ABORIGINAL CORPORATION**

PO Box E18, Emerton NSW 2770

28 Pringle Road, Hebersham NSW 2770

Ph: 9832 7167 Fax: 9832 7263

[koori@ozemail.com.au](mailto:koori@ozemail.com.au)

ABN: 83 535 742 276

22<sup>nd</sup> July 2021

To whom it may concern,

On behalf of Butucarbin, I would like to register interest in the consultation in relation to the Keyhole Lands Project.

Please see information in relation to Butucarbin below.

### **Cultural Connection and Representation**

Butucarbin Aboriginal Corporation is a successful not for profit community organisation that was established in 1989 to provide Community Development, Education and Training to organisations and individuals in the Blacktown and Penrith LGA's of Western Sydney. The organisation has won many awards for outstanding service delivery over the past 23 years. The latest being our Executive Officer Jennifer Beale being a finalist in the 2014 NSW Australian of the Year awards.

Due to the changes in funding for Aboriginal organisations and for Butucarbin to continue the service that they have been providing, the organisation has developed an Aboriginal Cultural Heritage Assessment business. All profits go back into the organisation to provide services to the community. As community workers we believe it is our duty to involve the Aboriginal community of Western Sydney in this work, as it enables the community to be involved in decisions relating to their culture and therefore, promotes self-determination.

Butucarbin is a contemporary example of cultural heritage in that it is a product of the 1970's resettlement program and self-determination policy (see, Aboriginal Community Controlled Organisations). Due to this resettlement policy, there are generations of Aboriginal people who have been born in Western Sydney and have been raised in the Mount Druitt Community (which has the highest Aboriginal urban population in Australia) and thus, this is where their connection lies. Ultimately, our cultural connection lies in our community work and assistance to the people of wider Western Sydney.

In conclusion, we also believe it is essential to pass on knowledge from generation to generation. Butucarbin provides cultural knowledge to the wider community through Aboriginal Cultural workshops and community development programs.

**Previous experience**

We have participated in projects with such companies as, Extent, Niche, Kelleher Nightingale, Artefact, AMBS, Virtus Heritage, Navin Officer, Curio and Biosis. This work has involved activities such as, site-walkovers, surface collections, ACHA reviews and excavations.

When on site, our workers were on time, professional and participate in all tasks set for them. It is essential for our community members to participate in Aboriginal Community Consultations and other cultural work as we believe it is of the utmost importance that cultural heritage skills and knowledge are passed on to our younger Aboriginal generations.

Overall, our team is highly skilled and has over ten years' experience in cultural heritage assessment field work. Currently, our team consists of several skilled field officers. We ensure there is diversity amongst our workers in that we do not discriminate against gender and age. In fact, we strongly encourage the employment of individuals of all ages and genders as it is essential to gain insight into cultural heritage from varying perspectives.

**Schedule of Rates**

In the event Butucarbin is selected for fieldwork, please consider our consultancy rates. Ultimately, Butucarbin can negotiate fees however, our standard fee is \$120 per hour.

Our rates are as follows:

Meetings/site inspections: \$120 - \$480

Fieldwork: \$120.00 per hour

Perusal and comment of reports: \$120.00 per hour

Mileage Allowance: 0.75 cents per kilometre

Pursuant to section 3.4, 'the proponent may reimburse Aboriginal people for any demonstrated reasonable out-of-pocket expenses directly incurred in order to participate in the consultation process.' An example of 'a demonstrated reasonable expense' could be the 'documented loss of wages caused by the need to take time from paid employment to participate in meetings' or travel expenses. Ultimately, Butucarbin's consultation rate includes \$120 per hour + reimbursed expenses.

If you require further information, you can contact Jennifer Beale on 0409924409 or Lowanna Gibson on 0458537666.

Yours Sincerely,

Lowanna Gibson

**Project Manager for Butucarbin Cultural Heritage**

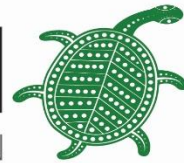
B.A Archaeology/Anthropology USYD

Juris Doctor UTS



# DARUG CUSTODIAN

ABORIGINAL CORPORATION



DARUG CUSTODIAN  
ABORIGINAL  
CORPORATION

PO BOX 81 WINDSOR 2756  
PHONE: 0245775181 FAX: 0245775098  
MOBILE: 0414962766 Justine Coplin  
EMAIL: justinecoplin@optusnet.com.au

---

**Attention:** Biosis

**Date:** 090721

**Subject:** Keyhole Lands Project

Dear Caitlin

Our group is a non-profit organisation that has been active for over forty years in Western Sydney, we are a Darug community group with over three hundred members. The main aim in our constitution is the care of Darug sites, places, wildlife and to promote our culture and provide education on the Darug history.

The Horsley Park area is an area that our group has a vast knowledge of, we have worked and lived in for many years, this area is significant to the Darug people due to the connection of sites and the continued occupation. Our group has been involved in all previous assessments and works in this area as a traditional owner Darug group for the past 40 plus years.

Therefore, we would like to register our interest for full consultation and involvement in the above project area.

Please contact us with all further enquiries on the above contacts.

Regards

Justine Coplin

We acknowledge and pay respect to the Darug people, the traditional Aboriginal custodians of this land.

**From:** justinecoplin@optusnet.com.au  
**Sent:** Friday, 9 July 2021 8:30 AM  
**To:** Caitlin McManus  
**Subject:** reg of interest Keyhole Lands Project  
**Attachments:** reg of interest Keyhole Lands Project.pdf

**From:** lilly carroll <didgengunawalclan@yahoo.com.au>  
**Sent:** Thursday, 8 July 2021 5:35 PM  
**To:** Caitlin McManus  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Hi Caitlin

DNC would like to register an interest into keyhole lands project stage one

[Sent from Yahoo Mail for iPhone](#)

On Thursday, July 8, 2021, 12:48 pm, Caitlin McManus <CMcManus@biosis.com.au> wrote:

Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park NSW.

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If you wish to register your interest please provide your contact details in writing via post or email by 5:00 pm 22 July 2021.

If you have any queries regarding the project please don't hesitate to contact Maggie Butcher via email or phone.

Thank you

Caitlin McManus  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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**From:** Goobah <goobahchts@gmail.com>  
**Sent:** Tuesday, 20 July 2021 5:48 PM  
**To:** Caitlin McManus  
**Subject:** 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Please accept my expression of interest with the above project and wish to be kept informed on any further developments

--

**Regards**

**Basil Smith**

**Chairperson/CEO**

**GOOBAH**

**Contact Details:**

**Address:**

**Unit 25 26-28**

**Native Way,**

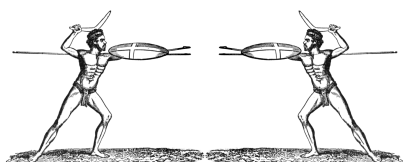
**MORUYA HEADS**

**NSW 2537**

**Mobile: 0405 995 725**

**Email: [goobahchts@gmail.com](mailto:goobahchts@gmail.com)**

**ABN: 67 517 874 760**



This email may contain privileged information. Privilege is not waived if it has been sent to you in error, or if you are not the intended recipient. Please immediately notify me and delete the email if you have received this in error.



**From:** Caine Carroll <Goodradigbee1@outlook.com>  
**Sent:** Wednesday, 14 July 2021 7:53 AM  
**To:** Caitlin McManus  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 1 Invitation to Register

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Caitlin,

Goodradigbee would like to register our interest in the project.

Best contact will be Caine and contact email is [caine@gcahac.com.au](mailto:caine@gcahac.com.au)

Please keep us updated on this project.

Kind Regards,

**Caine Carroll**

0410 974 236  
Director

Goodradigbee Cultural & Heritage Aboriginal Corporation (GCAHAC)

On 8 Jul 2021, at 12:48 pm, Caitlin McManus <[CMcManus@biosis.com.au](mailto:CMcManus@biosis.com.au)> wrote:

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Thank you

**Caitlin McManus**

Research Assistant - Heritage

M: 0438 537 634

D: (02) 9101 8726

E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)

[<image4185d6.PNG>](#)

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<34802.Keyhole.Lands.Stage.1..pdf>

**From:** Wendy Morgan <wenlissa01@hotmail.com>  
**Sent:** Wednesday, 21 July 2021 4:14 PM  
**To:** Caitlin McManus  
**Subject:** RE: 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Hi Caitlin,

Thank you very much for your invitation to be part of the Aboriginal Community consultation re: Assisting Biosis GARI accepts your invitation with great pleasure.

GARI's Cultural and Heritage Officer has participated in excavations in this area in the past and hold cultural knowledge and experience working with Archaeologist.

Organisation: Guntawang Aboriginal Resources Inc  
Contact Person: Wendy Morgan  
Mobile no. 0414 964 657  
Address: 113 Reservoir Rd Mt Pritchard NSW 2170  
Email: [Wenlissa01@hotmail.com](mailto:Wenlissa01@hotmail.com)

Nominated Organisation Contact Person: Wendy Morgan  
Preferred communication: Email/ telephone and community consultation

**GARI is interested in the 3 components of this project**

- 1/ attending meetings, via telephone or zoom and participate in community consultations when required
- 2/ Fieldwork participation and reviewing documentation ( it is difficult to provide practical information if you are not part of the fieldwork and digs)
- 3/ GARI's C&H Officers hold knowledge of the area from prior participation in other digs in the area. His knowledge which he has learnt from his Elders, family members from the Far South Coast and experience from working with other Archaeologists for over the past 8 years.

Kind regards

Wendy Morgan  
CEO GARI  
0414 964 657

Sent from [Mail](#) for Windows 10

---

**From:** [Caitlin McManus](#)  
**Sent:** Thursday, 8 July 2021 12:48 PM  
**To:** '[Wenlissa01@hotmail.com](mailto:Wenlissa01@hotmail.com)'  
**Subject:** 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park NSW.

Biosis is assisting Fraser Property with consultation with the Aboriginal community to inform the ACHA.

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

If you wish to register your interest please provide your contact details in writing via post or email by 5:00 pm 22 July 2021.

If you have any queries regarding the project please don't hesitate to contact Maggie Butcher via email or phone.

Thank you

**Caitlin McManus**

Research Assistant - Heritage

M: 0438 537 634

D: (02) 9101 8726

E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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**From:** philip khan <philipkhan.acn@live.com.au>  
**Sent:** Thursday, 8 July 2021 3:41 PM  
**To:** Caitlin McManus  
**Subject:** RE: 34802- Keyhole Lands Project – Stage 1 Invitation to Register  
**Attachments:** ICARE workers comp. insurance Kamilaroi Yankuntjatjara Working Group 2021.pdf; Public Liability Kamilaroi 2021 to 2022.pdf

**Follow Up Flag:** FollowUp  
**Flag Status:** Flagged

Hi Caitlin,

Thank you for informing us that **Biosis** will be involved in an Aboriginal Cultural Heritage Assessment for the **Keyhole Lands Project** & that you are inviting Aboriginal organisations to register, if they wish too be involved in the community consultation process.

As a senior Aboriginal person for the past 50yrs, I actively participate in the protection of the Aboriginal Cultural Heritage throughout the Sydney Basin, & particularly throughout Western Sydney, on behalf of Kamilaroi Yankuntjatjara Working Group I wish to provide to you my organisation's registration of interest.

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

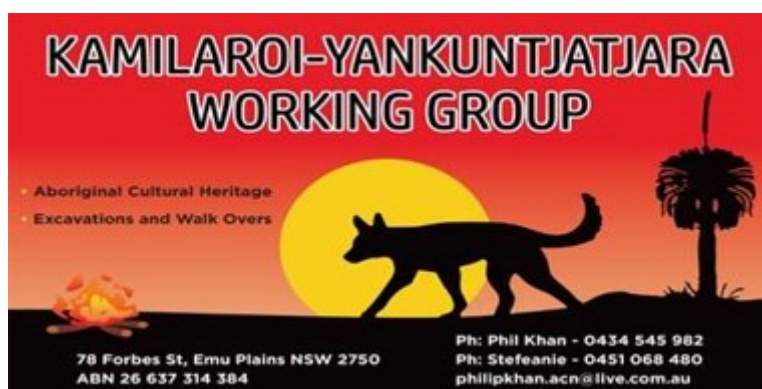
I have attached a copy of Kamilaroi Yankuntjatjara Working group's Public Liability Insurance & Workers Compensation certificate.

Our Rates - \$100 per hour, \$400 half day & \$800 full day (Exc. GST)

Our RAPS have up to 15yrs Cultural Heritage experience in – field work which involves manual excavation (digging), sieving, identifying artefacts, setting up transits, setting up equipment, packing equipment, site surveys & attending meetings.

Should you wish me to provide further information, please do not hesitate to contact me on 0434545982 or Stefeanie on 0451068480.

Kind Regards  
Phil Khan



Sent from [Mail](#) for Windows 10

---

**From:** [Caitlin McManus](#)  
**Sent:** Thursday, 8 July 2021 12:48 PM  
**To:** '[philipkhan.acn@live.com.au](mailto:philipkhan.acn@live.com.au)'  
**Subject:** 34802- Keyhole Lands Project – Stage 1 Invitation to Register

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If you have any queries regarding the project please don't hesitate to contact Maggie Butcher via email or phone.

Thank you

**Caitlin McManus**

Research Assistant - Heritage

M: 0438 537 634

D: (02) 9101 8726

E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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**From:** Maggie Butcher  
**Sent:** Thursday, 15 July 2021 11:47 AM  
**To:** Caitlin McManus  
**Subject:** FW: Keyhole Lands

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Could you please put this into consultation for 34802

Thanks,  
Maggie

**Maggie Butcher**  
Consultant Archaeologist  
M: 0428 542 268  
D: (02) 9101 8707  
E: [mbutcher@biosis.com.au](mailto:mbutcher@biosis.com.au)



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---

**From:** Scott Franks <[scott@tocomwall.com.au](mailto:scott@tocomwall.com.au)>  
**Sent:** Thursday, 15 July 2021 11:41 AM  
**To:** Maggie Butcher <[MButcher@biosis.com.au](mailto:MButcher@biosis.com.au)>  
**Subject:** Keyhole Lands

Dear Maggie,

Please be advised that Tocomwall only received today in the post the invitation to register and interest in the Keyhole Lands today 15<sup>th</sup> July 2021. Australia post now longer guarantee any time frame for surface mail and as such posting notification do not guarantee Raps revise this notice in time to register.

Could you please register Tocomwall's interest in this project please?

Regards  
Scott Franks  
CEO

Native Title & Environmental Services Consultant  
Native title applicant for the PCWP

Tocomwall Pty Ltd  
Po box 145, Miranda NSW 1490.



m: 0404 171544

e: [scott@tocomwall.com.au](mailto:scott@tocomwall.com.au)

[www.tocomwall.com.au](http://www.tocomwall.com.au)



The information contained in this e-mail message and any attached files may be confidential and may contain copyright material of Tocomwall Pty Ltd or third parties. Any unauthorised use, disclosure or copying of this e-mail and/or its attachments is prohibited. If you have received this e-mail in error, please notify the sender immediately by return e-mail and delete all copies of the message and attachments. Before opening or using attachments, please check them for viruses or defects. Our liability is limited to resupplying the e-mail and attached files. Content and views expressed in this e-mail may be those of the sender, and are not necessarily endorsed by Tocomwall Pty Ltd.

**From:** Rodney Gunther <waawaar.awaa@gmail.com>  
**Sent:** Tuesday, 13 July 2021 7:01 PM  
**To:** Caitlin McManus; Maggie Butcher  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 1 Invitation to Register  
**Attachments:** Workers Insurance Certificate of Currency 2022 (1).pdf; Certificate of Currency.pdf

Hi Maggie,

Please register Waawaar Awaa Aboriginal Corporation for the Aboriginal Cultural Heritage Assessment at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales.

Relevant insurances are attached for future reference.

regards

Rodney Gunther

0410 580 962

On Thu, Jul 8, 2021 at 12:47 PM Caitlin McManus <[CMcManus@biosis.com.au](mailto:CMcManus@biosis.com.au)> wrote:

Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park NSW.

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

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If you have any queries regarding the project please don't hesitate to contact Maggie Butcher via email or phone.

Thank you

**Caitlin McManus**  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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**From:** WIDESCOPE . <widescope.group@live.com>  
**Sent:** Tuesday, 27 July 2021 2:10 PM  
**To:** Caitlin McManus  
**Subject:** RE: 34802- Keyhole Lands Project – Stage 1 Invitation to Register

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Afternoon Caitlin,

Steven Hickey would like to register his interest in the project. Sorry for the registration

Regards  
Donna Hickey  
(Admin) 0425232056

---

**From:** [Caitlin McManus](#)  
**Sent:** Thursday, 8 July 2021 12:48 PM  
**To:** '[widescope.group@live.com](mailto:widescope.group@live.com)'  
**Subject:** 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park NSW.

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If you have any queries regarding the project please don't hesitate to contact Maggie Butcher via email or phone.

Thank you

**Caitlin McManus**  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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**From:** Darleen Johnson <murrabidgeemullangari@yahoo.com.au>  
**Sent:** Sunday, 8 August 2021 10:15 PM  
**To:** Caitlin McManus  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 1 Invitation to Register  
**Attachments:** 34802.Keyhole.Lands.Stage.1..pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Caitlin

Could you please register our corporation for the above project.

Thanks

Ryan Johnson

0475565517

On Thursday, 8 July 2021, 12:48:10 pm AEST, Caitlin McManus <cmcmanus@biosis.com.au> wrote:

Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park NSW.

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Thank you

**Caitlin McManus**  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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**From:** Bo Field <yurrandaali\_cs@hotmail.com>  
**Sent:** Tuesday, 3 August 2021 11:33 AM  
**To:** Caitlin McManus  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 1 Invitation to Register

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Caitlin,

Yurrandaali would like to register for this project

Regards,

Bo Field - Manager  
Yurrandaali Cultural Services  
0403 048 263 | yurrandaali\_cs@hotmail.com

---

**From:** Caitlin McManus <CMcManus@biosis.com.au>  
**Sent:** Thursday, 8 July 2021 12:47 PM  
**To:** 'yurrandaali\_cs@hotmail.com' <yurrandaali\_cs@hotmail.com>  
**Subject:** 34802- Keyhole Lands Project – Stage 1 Invitation to Register  
Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park NSW.

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If you have any queries regarding the project please don't hesitate to contact Maggie Butcher via email or phone.

Thank you

**Caitlin McManus**  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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

---

**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:44 AM  
**To:** 'didgengunawalclan@yahoo.com.au'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

The following project information and assessment methodology (attached PDF) has been provided to provide you with information about the project, the methodology and to seek your feedback. It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by 5:00 pm 30 August 2021.

Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:44 AM  
**To:** 'justinecoplin@optusnet.com.au'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

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Thank you,

Caitlin

**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:44 AM  
**To:** 'butuheritage@gmail.com'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

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Thank you,

Caitlin

**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:43 AM  
**To:** 'Wenlissa01@hotmail.com'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

Good morning,

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Caitlin

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**Sent:** Monday, 2 August 2021 11:43 AM  
**To:** 'Waawaar.awaa@gmail.com'  
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Thank you,

Caitlin



**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:43 AM  
**To:** 'scott@tocomwall.com.au'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

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Thank you,

Caitlin

**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:43 AM  
**To:** 'philipkhan.acn@live.com.au'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
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Thank you,

Caitlin

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**Sent:** Monday, 2 August 2021 11:43 AM  
**To:** 'goodradigbee1@outlook.com'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

The following project information and assessment methodology (attached PDF) has been provided to provide you with information about the project, the methodology and to seek your feedback. It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by 5:00 pm 30 August 2021.

Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:42 AM  
**To:** 'goobahchts@gmail.com'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

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Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:42 AM  
**To:** 'barrabyculturalservices@gmail.com'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

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Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:42 AM  
**To:** 'James.eastwood@y7mail.com'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

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Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:42 AM  
**To:** 'Cazadirect@live.com'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

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Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin



**From:** Caitlin McManus  
**Sent:** Monday, 2 August 2021 11:44 AM  
**To:** 'widescope.group@live.com'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation  
**Attachments:** 34802.Keyhole.Lands.Stage.2.and.3.pdf

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

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Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

**From:** Caitlin McManus  
**Sent:** Tuesday, 10 August 2021 3:12 PM  
**To:** 'Bo Field'  
**Subject:** RE: 34802- Keyhole Lands Project – Stage 1 Invitation to Register  
**Attachments:** 34802.Yurrandaali.Stage.2.and.3.20210810.pdf

Good Afternoon Bo,

Thank you for the registration. Due to the late registration, you were missed in the initial stage 2 & 3 mail out. I have registered your group and please see attached Stage 2 and 3 documentation.

The following project information and assessment methodology (attached PDF) has been provided to provide you with information about the project, the methodology and to seek your feedback. It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021**.

Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

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**From:** Bo Field <yurrandaali\_cs@hotmail.com>  
**Sent:** Tuesday, 3 August 2021 11:33 AM  
**To:** Caitlin McManus <CMcManus@biosis.com.au>  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Dear Caitlin,

Yurrandaali would like to register for this project

Regards,

Bo Field - Manager  
Yurrandaali Cultural Services  
0403 048 263 | [yurrandaali\\_cs@hotmail.com](mailto:yurrandaali_cs@hotmail.com)

---

**From:** Caitlin McManus <[CMcManus@biosis.com.au](mailto:CMcManus@biosis.com.au)>  
**Sent:** Thursday, 8 July 2021 12:47 PM  
**To:** 'yurrandaali\_cs@hotmail.com' <[yurrandaali\\_cs@hotmail.com](mailto:yurrandaali_cs@hotmail.com)>  
**Subject:** 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park NSW.

Biosis is assisting Fraser Property with consultation with the Aboriginal community to inform the ACHA.

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

If you wish to register your interest please provide your contact details in writing via post or email by 5:00 pm 22 July

2021.

If you have any queries regarding the project please don't hesitate to contact Maggie Butcher via email or phone.

Thank you

**Caitlin McManus**

Research Assistant - Heritage

M: 0438 537 634

D: (02) 9101 8726

E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



**Leaders in Ecology and Heritage Consulting**

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

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**From:** Caitlin McManus  
**Sent:** Tuesday, 10 August 2021 3:13 PM  
**To:** 'Darleen Johnson'  
**Subject:** RE: 34802- Keyhole Lands Project – Stage 2 and 3  
**Attachments:** 34802.MBMAC.Stage.2.and.3.20210810.pdf

Hi Ryan & Darleen,

Thank you for the registration. Due to the late registration, you were missed in the initial stage 2 & 3 mail out. I have registered your group and please see attached Stage 2 and 3 documentation.

The following project information and assessment methodology (attached PDF) has been provided to provide you with information about the project, the methodology and to seek your feedback. It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021**.

Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

---

**From:** Darleen Johnson <murrabidgeemullangari@yahoo.com.au>  
**Sent:** Sunday, 8 August 2021 10:15 PM  
**To:** Caitlin McManus <CMcManus@biosis.com.au>  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Hi Caitlin  
Could you please register our corporation for the above project.  
Thanks  
Ryan Johnson  
0475565517

On Thursday, 8 July 2021, 12:48:10 pm AEST, Caitlin McManus <[cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)> wrote:

Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park NSW.

Biosis is assisting Fraser Property with consultation with the Aboriginal community to inform the ACHA.

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

If you wish to register your interest please provide your contact details in writing via post or email by 5:00 pm 22 July 2021.

If you have any queries regarding the project please don't hesitate to contact Maggie Butcher via email or phone.

Thank you

**Caitlin McManus**  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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2 August 2021

A1 Indigenous Services  
Carolyn Hickey  
10 Marie Pitt Place, Glenmore Park NSW 2745

Dear Carolyn,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

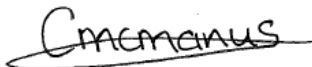
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely



Caitlin McManus  
Research Assistant



## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
58B	17288	211-217 Chandos Road, Horsley Park
58A	17288	203-209 Chandos Road, Horsley Park
57	13961	187-201 Chandos Road, Horsley Park
56	13961	171-185 Chandos Road, Horsley Park
A	361393	155-169 Chandos Road, Horsley Park
B	361393	137-153 Chandos Road, Horsley Park

Lot No.	Deposited Plan	Address
54	13961	121-135 Chandos Road, Horsley Park
59B	362022	143-155 Redmayne Road, Horsley Park
59A	362022	157-165 Redmayne Road, Horsley Park
1	505934	167-183 Redmayne Road, Horsley Park
2	505934	185-193 Redmayne Road, Horsley Park
61B	17288	195 Redmayne Road, Horsley Park
A	347034	203-210 Redmayne Road, Horsley Park
B	347034	215-223 Redmayne Road, Horsley Park
63	13961	225-245 Redmayne Road, Horsley Park
77	13961	120-134 Redmayne Road, Horsley Park
B	357890	136-142 Redmayne Road, Horsley Park
A	357890	144-150 Redmayne Road, Horsley Park
74B	17288	182-190 Redmayne Road, Horsley Park
74A	17288	200-206 Redmayne Road, Horsley Park
78B	347873	1671-1675 The Horsley Drive, Horsley Park
79A	17288	1667 The Horsley Drive, Horsley Park
79B	17288	1657-1665 The Horsley Drive, Horsley Park
1	849699	1637-1645 The Horsley Drive, Horsley Park
81A	348110	1627-1635 The Horsley Drive, Horsley Park
81B	348110	1617-1625 The Horsley Drive, Horsley Park
C	398446	1681 The Horsley Drive, Horsley Park
D	398446	1677-1679 The Horsley Drive, Horsley Park
A	394855	220 Redmayne Road, Horsley Park
B	394855	222-230 Redmayne Road, Horsley Park

## Background

Biosis conducted an Aboriginal Due Diligence Assessment for the study area in March 2021. A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client Service ID: 576371) identified 103 Aboriginal archaeological sites within a 3.5 by 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082) was identified within the southern portion of the study area, and four additional Potential Archaeological Deposits (PAD) sites (AHIMS 45-5-4679, 45-5-4682, 45-5-4683, and 45-5-4684) were located within 200 metres. These sites are located within close proximity to Eastern Creek and its associated tributaries, particularly the first order drainage line located within the southern portion of the study area. The sites are predominately silcrete based artefacts scatters, with silicified tuff, quartz, and fine grained siliceous material present and are located upon hillslope/creekflat landforms within 100 metres of fresh water sources.

The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

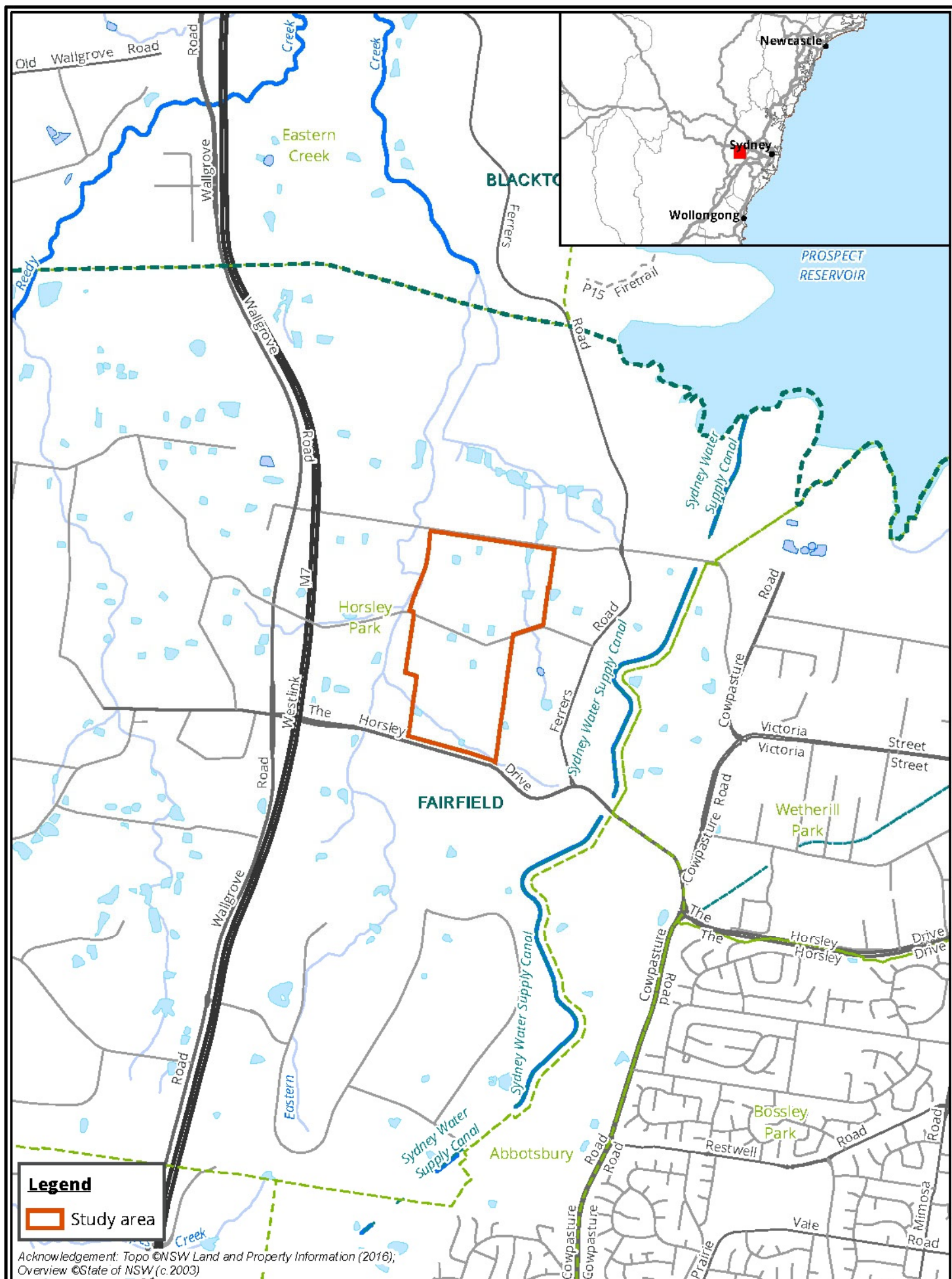
Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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



**Figure 1 Location of the study area**

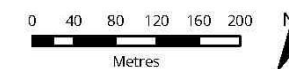




#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

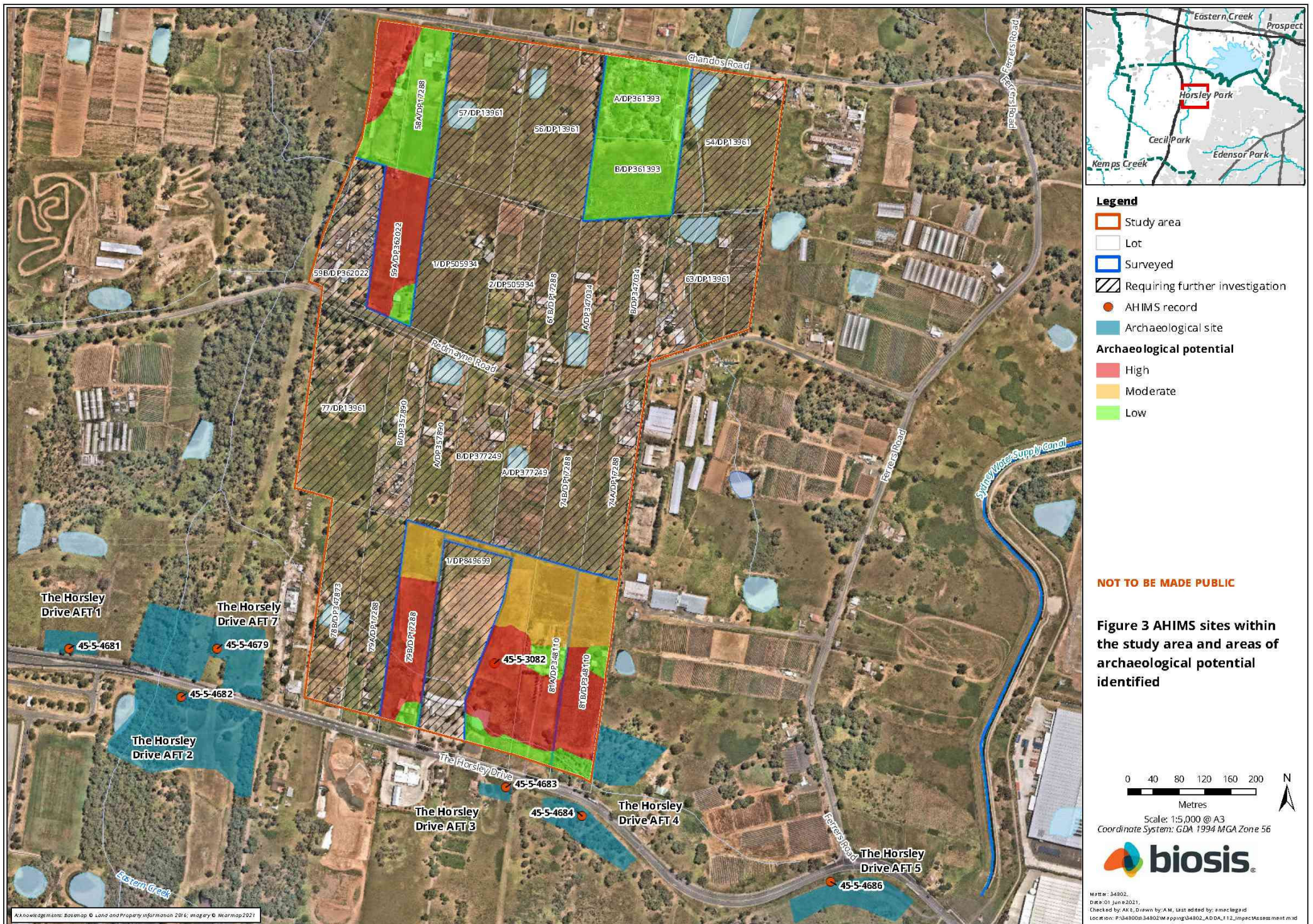


Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
Date: 28 May 2021,  
Checked by: AKE, Drawn by: LH, Last edited by: Barley  
Location: P:\34800\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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

- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

## **Culturally sensitive material**

Biosis invites RAPs to provide culturally appropriate information via mail, email or phone with regards to this project.

Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report. If the information is regarded as too sensitive to be made public then RAPs should advise Biosis and identify the nature of the sensitivity. Biosis will then arrange for the recording of the information in accordance with its sensitivity. Documents which hold sensitive information will clearly list, on the front cover, who can have access to the document. These documents will be stored securely.

## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting GSV combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made in the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082 upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

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

Detailed results of the field investigation will be provided in the draft ACHA report and AR. Additional field investigations of the lots which were inaccessible will be undertaken as part of the ACHA process.

### **Archaeological test excavations (if required)**

Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

The aims of the testing program are to:

- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).

- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- If the depth of deposit prevents reaching sterile deposits within the 50 by 50 centimetre test pit, additional 50 by 50 centimetre test pits may be excavated adjacent to the original test pit (for example expanding the test pit to 50 by 100 centimetres) to reach the sterile deposits.
- Test pits may be combined and excavated as necessary in 50 by 50 centimetre units for the purposes of further understanding site characteristics. Note that under the Code, the maximum area that can be excavated in any one continuous area is three metres squared (3 m<sup>2</sup>).
- The Code dictates that the maximum surface area of all test excavation units must be no greater than 0.5% of the PAD or area being investigated.
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- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
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- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present with regard to their nature and significance.

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- Cultural material can be held by the Aboriginal community under a care and control agreement.
- Cultural material can be returned to country and reburied as soon as practicable in a secure location in accordance with Requirements 16b and 26 of the code.

**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**

## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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

The ACHA report will contain:

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

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

As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

The final report will incorporate all comments and will be forwarded on to RAPs once completed.

## References

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Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.



2 August 2021

Aragung Aboriginal Cultural Heritage Site Assessments  
Jamie Eastwood  
33 Bulolo Drive Whalan NSW 2770

Dear Jamie ,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

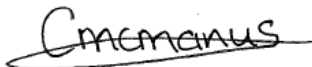
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely



Caitlin McManus  
Research Assistant

## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
58B	17288	211-217 Chandos Road, Horsley Park
58A	17288	203-209 Chandos Road, Horsley Park
57	13961	187-201 Chandos Road, Horsley Park
56	13961	171-185 Chandos Road, Horsley Park
A	361393	155-169 Chandos Road, Horsley Park
B	361393	137-153 Chandos Road, Horsley Park

Lot No.	Deposited Plan	Address
54	13961	121-135 Chandos Road, Horsley Park
59B	362022	143-155 Redmayne Road, Horsley Park
59A	362022	157-165 Redmayne Road, Horsley Park
1	505934	167-183 Redmayne Road, Horsley Park
2	505934	185-193 Redmayne Road, Horsley Park
61B	17288	195 Redmayne Road, Horsley Park
A	347034	203-210 Redmayne Road, Horsley Park
B	347034	215-223 Redmayne Road, Horsley Park
63	13961	225-245 Redmayne Road, Horsley Park
77	13961	120-134 Redmayne Road, Horsley Park
B	357890	136-142 Redmayne Road, Horsley Park
A	357890	144-150 Redmayne Road, Horsley Park
74B	17288	182-190 Redmayne Road, Horsley Park
74A	17288	200-206 Redmayne Road, Horsley Park
78B	347873	1671-1675 The Horsley Drive, Horsley Park
79A	17288	1667 The Horsley Drive, Horsley Park
79B	17288	1657-1665 The Horsley Drive, Horsley Park
1	849699	1637-1645 The Horsley Drive, Horsley Park
81A	348110	1627-1635 The Horsley Drive, Horsley Park
81B	348110	1617-1625 The Horsley Drive, Horsley Park
C	398446	1681 The Horsley Drive, Horsley Park
D	398446	1677-1679 The Horsley Drive, Horsley Park
A	394855	220 Redmayne Road, Horsley Park
B	394855	222-230 Redmayne Road, Horsley Park

## Background

Biosis conducted an Aboriginal Due Diligence Assessment for the study area in March 2021. A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client Service ID: 576371) identified 103 Aboriginal archaeological sites within a 3.5 by 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082) was identified within the southern portion of the study area, and four additional Potential Archaeological Deposits (PAD) sites (AHIMS 45-5-4679, 45-5-4682, 45-5-4683, and 45-5-4684) were located within 200 metres. These sites are located within close proximity to Eastern Creek and its associated tributaries, particularly the first order drainage line located within the southern portion of the study area. The sites are predominately silcrete based artefacts scatters, with silicified tuff, quartz, and fine grained siliceous material present and are located upon hillslope/creekflat landforms within 100 metres of fresh water sources.

The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

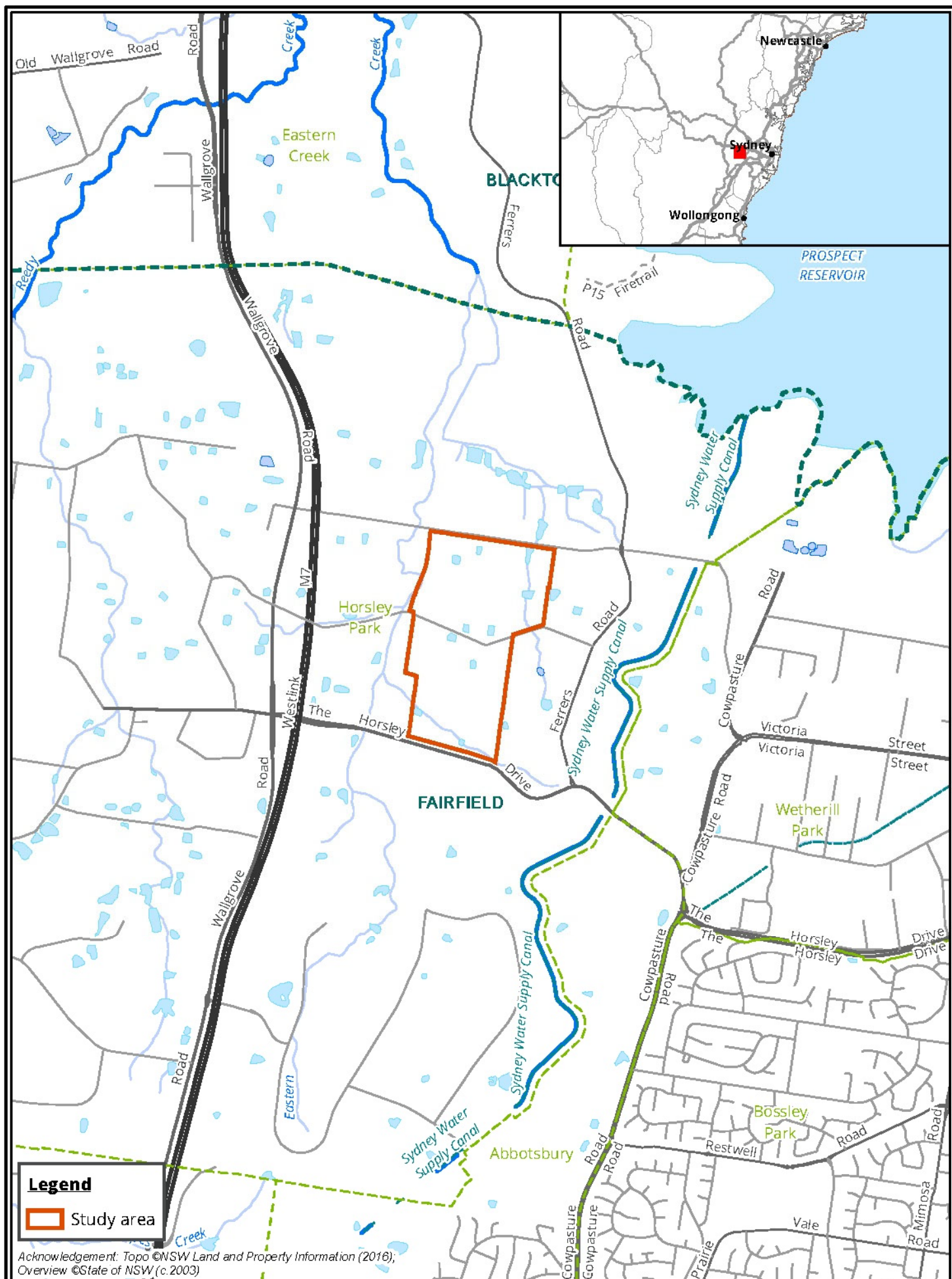
Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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



**Figure 1 Location of the study area**

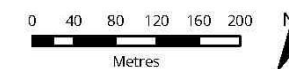




#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

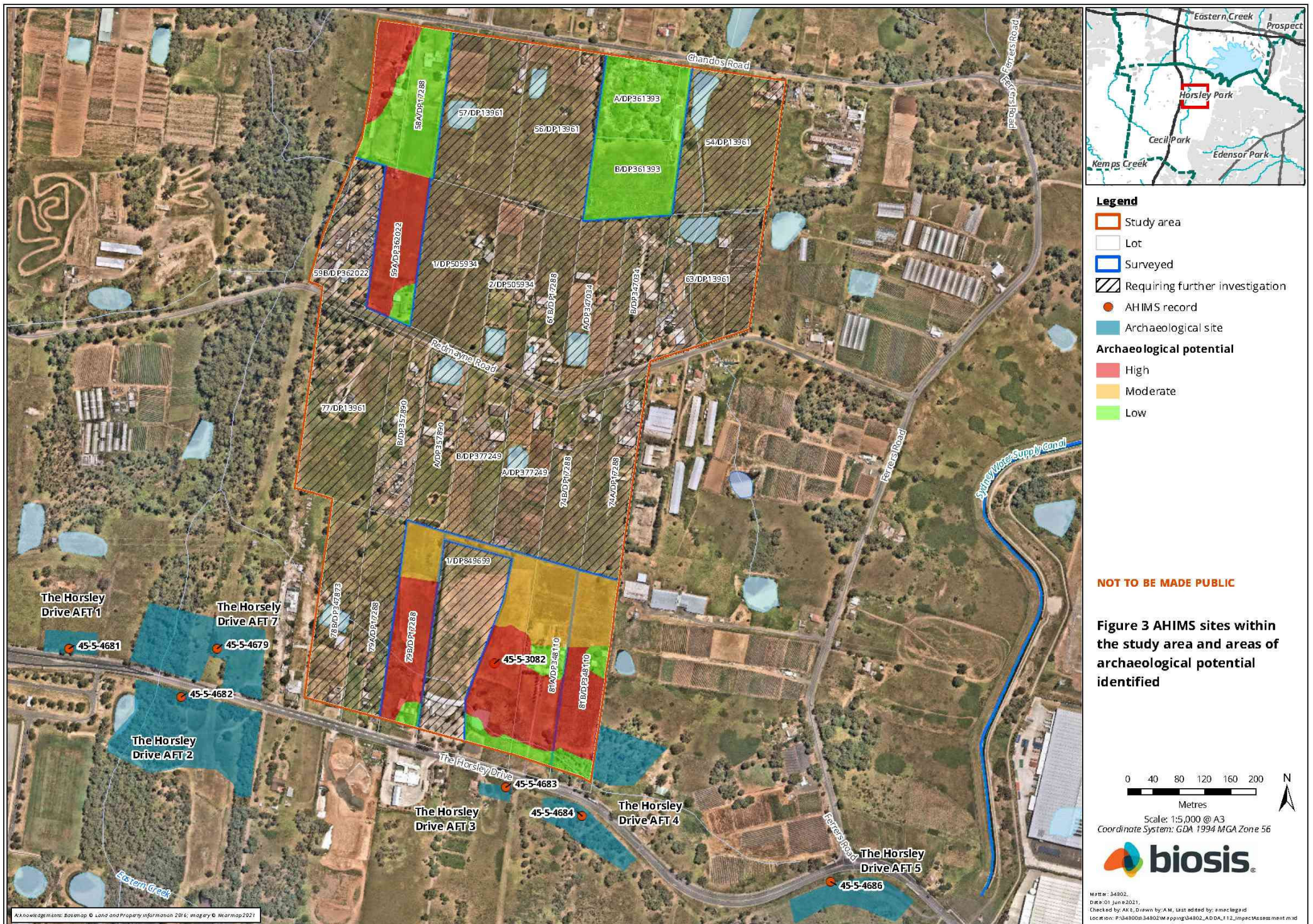


Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
Date: 28 May 2021,  
Checked by: AKE, Drawn by: LH, Last edited by: Barley  
Location: P:\34800\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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

- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

## **Culturally sensitive material**

Biosis invites RAPs to provide culturally appropriate information via mail, email or phone with regards to this project.

Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report. If the information is regarded as too sensitive to be made public then RAPs should advise Biosis and identify the nature of the sensitivity. Biosis will then arrange for the recording of the information in accordance with its sensitivity. Documents which hold sensitive information will clearly list, on the front cover, who can have access to the document. These documents will be stored securely.

## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting GSV combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made in the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082 upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

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

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Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.

2 August 2021

Barraby Cultural Services  
Lee Field  
10B Elphin Street, Tahmoor NSW 2573

Dear Lee ,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

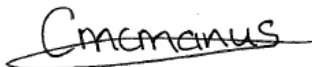
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely



Caitlin McManus  
Research Assistant

## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
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## Background

Biosis conducted an Aboriginal Due Diligence Assessment for the study area in March 2021. A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client Service ID: 576371) identified 103 Aboriginal archaeological sites within a 3.5 by 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082) was identified within the southern portion of the study area, and four additional Potential Archaeological Deposits (PAD) sites (AHIMS 45-5-4679, 45-5-4682, 45-5-4683, and 45-5-4684) were located within 200 metres. These sites are located within close proximity to Eastern Creek and its associated tributaries, particularly the first order drainage line located within the southern portion of the study area. The sites are predominately silcrete based artefacts scatters, with silicified tuff, quartz, and fine grained siliceous material present and are located upon hillslope/creekflat landforms within 100 metres of fresh water sources.



The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

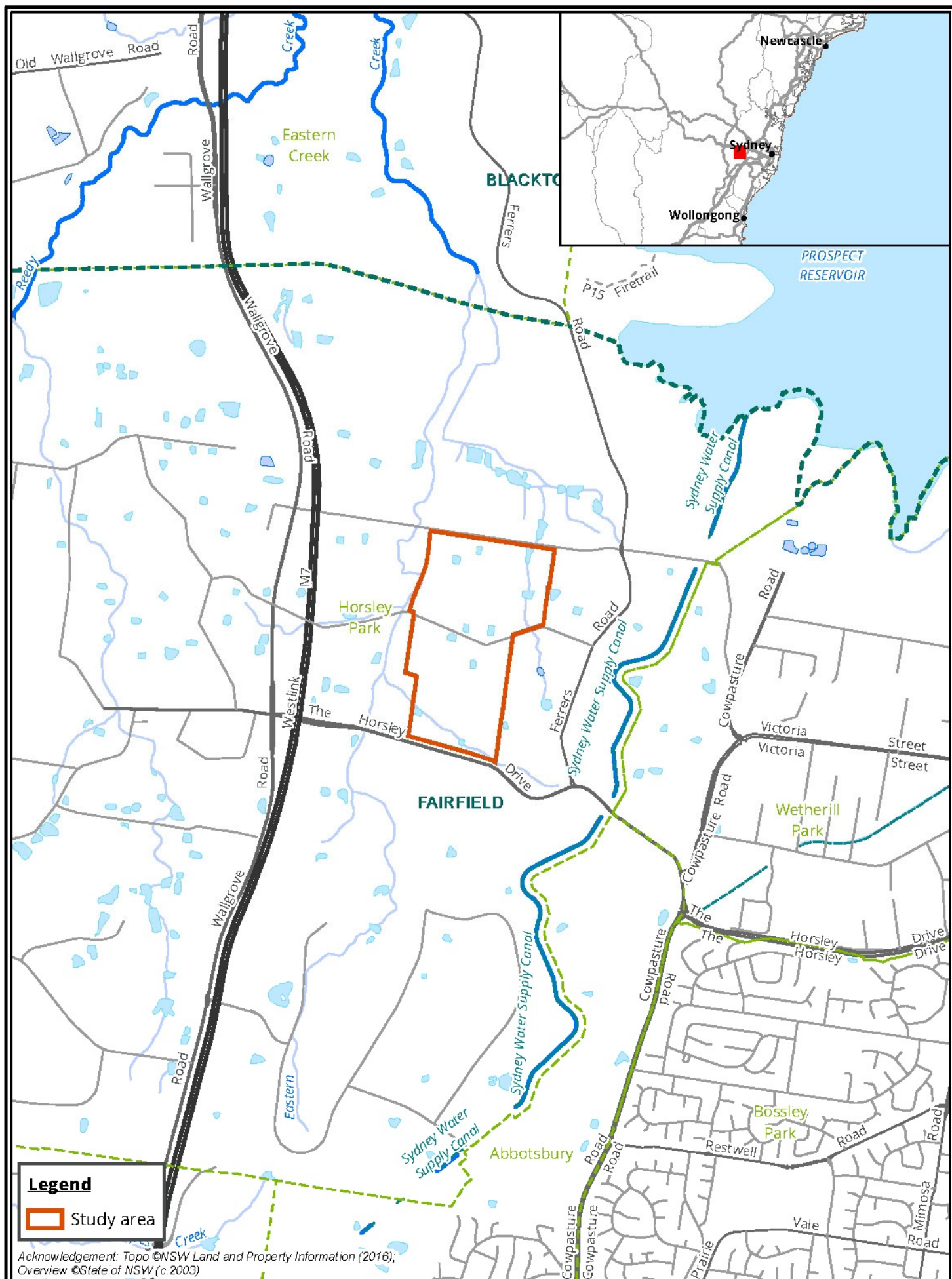
Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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



**Figure 1 Location of the study area**





#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

0 40 80 120 160 200

Metres

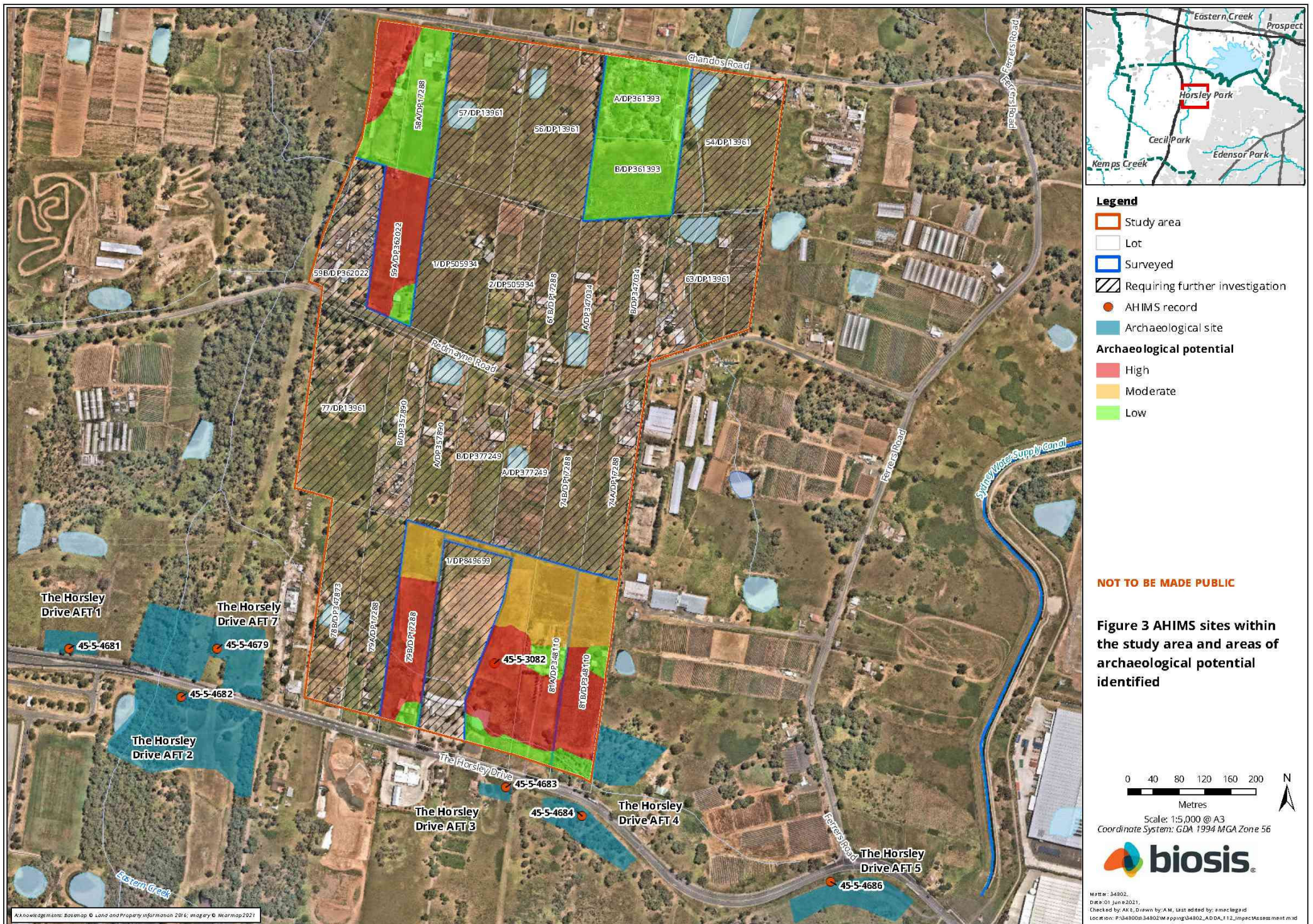
Scale: 1:5,000 @ A3

Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
 Date: 28 May 2021,  
 Checked by: AKE, Drawn by: LH, Last edited by: Barley  
 Location: P:\348006\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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



- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

## **Culturally sensitive material**

Biosis invites RAPs to provide culturally appropriate information via mail, email or phone with regards to this project.

Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report. If the information is regarded as too sensitive to be made public then RAPs should advise Biosis and identify the nature of the sensitivity. Biosis will then arrange for the recording of the information in accordance with its sensitivity. Documents which hold sensitive information will clearly list, on the front cover, who can have access to the document. These documents will be stored securely.

## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting GSV combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made in the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082 upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

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

Detailed results of the field investigation will be provided in the draft ACHA report and AR. Additional field investigations of the lots which were inaccessible will be undertaken as part of the ACHA process.

### **Archaeological test excavations (if required)**

Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

The aims of the testing program are to:

- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).

- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- If the depth of deposit prevents reaching sterile deposits within the 50 by 50 centimetre test pit, additional 50 by 50 centimetre test pits may be excavated adjacent to the original test pit (for example expanding the test pit to 50 by 100 centimetres) to reach the sterile deposits.
- Test pits may be combined and excavated as necessary in 50 by 50 centimetre units for the purposes of further understanding site characteristics. Note that under the Code, the maximum area that can be excavated in any one continuous area is three metres squared (3 m<sup>2</sup>).
- The Code dictates that the maximum surface area of all test excavation units must be no greater than 0.5% of the PAD or area being investigated.
- All excavated soil will be sieved in 5 millimetre sieves. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Sydney Biosis office for analysis (at Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour and texture.
  - Amount and location of cultural material within the deposit.
  - Nature of disturbance where present.
  - Stratigraphy.
  - Archaeological features (if present).
  - Photographic records.
  - Spit records.
- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- In the event that suspected human remains are identified works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present with regard to their nature and significance.

*\*Enough information is defined by Heritage NSW as meaning “the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance. This may include things like locally or regionally high object density; presence of rare or representative objects; presence of archaeological features; or locally or regionally significant deposits stratified or not.”(DECCW 2010b, p.28).*

### **Storage of cultural material**

Any cultural material identified during test excavations will be temporarily stored in the Sydney Biosis office for analysis (Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).

Once the cultural material has been analysed, the cultural material can be managed in the following manners:

- Cultural material can be held by the Aboriginal community under a care and control agreement.
- Cultural material can be returned to country and reburied as soon as practicable in a secure location in accordance with Requirements 16b and 26 of the code.

**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**

## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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

The ACHA report will contain:

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

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

As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

The final report will incorporate all comments and will be forwarded on to RAPs once completed.

## References

AMBS 2006, *Volume 1: Aboriginal Heritage Management Plan: West Dapto Release Area*, An unpublished report to Wollongong City Council.

Artefact Heritage 2018, *Rezoning and subdivision of 109 Darkes Road, Kembla Grange*, Report to NewQuest Property Pty Ltd.

Biosis Pty Ltd 2015, *Lot 1, DP 825516, Farmborough Heights NSW. Aboriginal Cultural Heritage Assessment for Proposed Rezoning*, Report to Plannex Environmental Planning.

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

DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment and Climate Change, Sydney NSW.

OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.



2 August 2021

Goobah Developments  
Basil Smith  
66 Grantham Road, Batehaven NSW, 2536

Dear Basil,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

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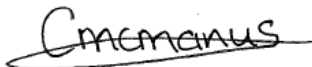
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Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

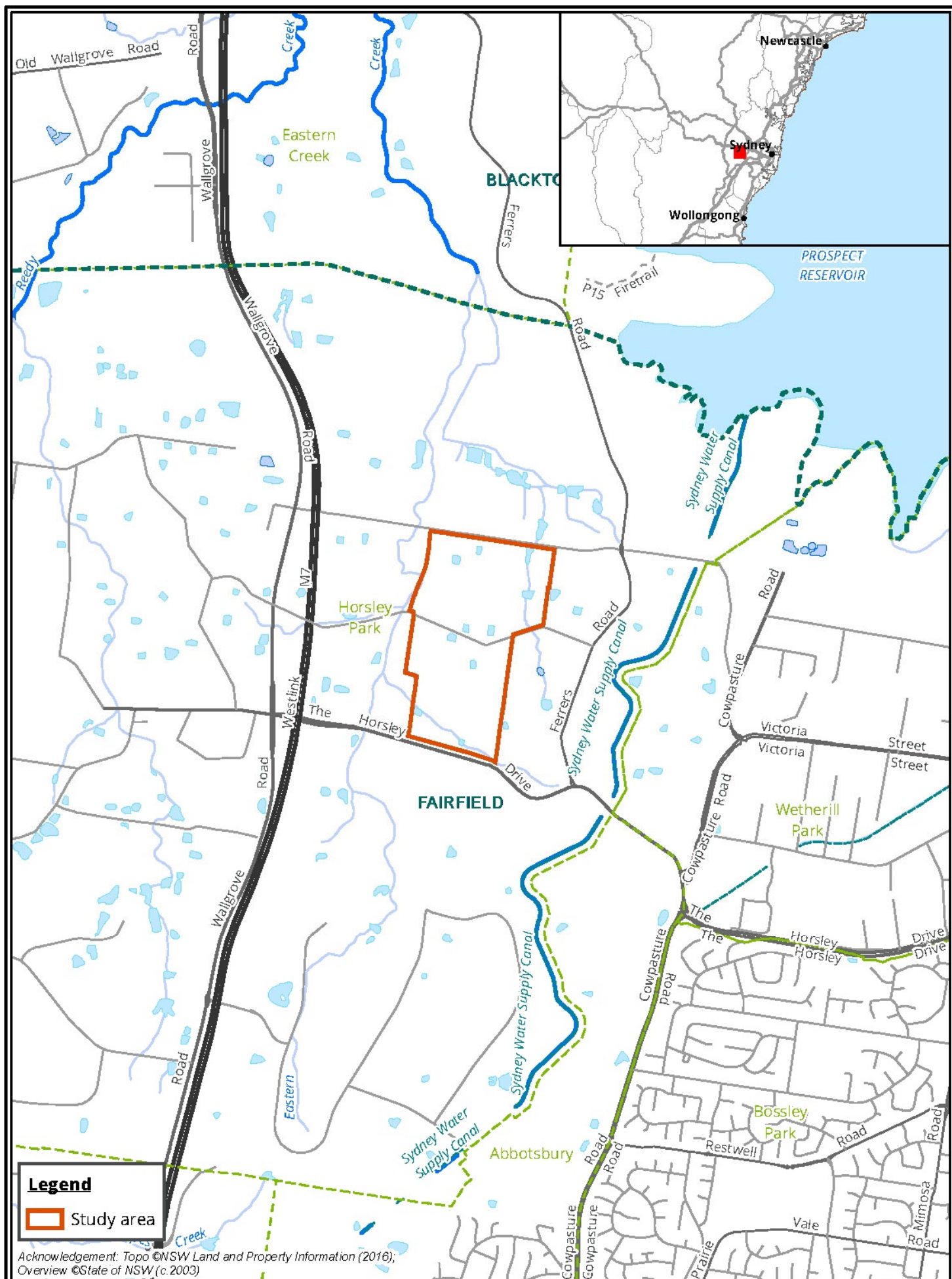
<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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





**Figure 1 Location of the study area**





#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

0 40 80 120 160 200

Metres

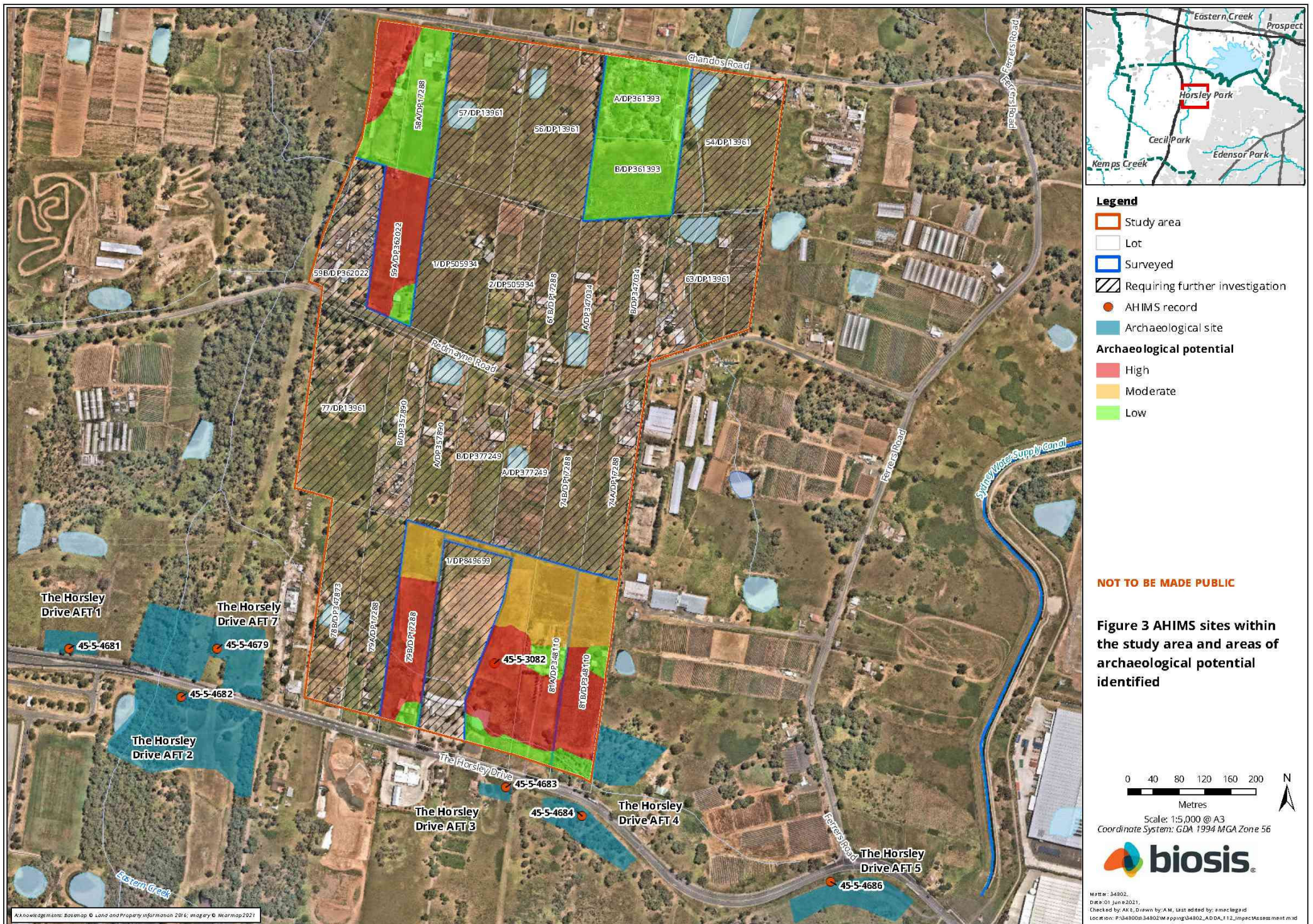
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Matter: 34802,  
Date: 28 May 2021,  
Checked by: AKE, Drawn by: LH, Last edited by: Barley  
Location: P:\34800\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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

- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
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Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report. If the information is regarded as too sensitive to be made public then RAPs should advise Biosis and identify the nature of the sensitivity. Biosis will then arrange for the recording of the information in accordance with its sensitivity. Documents which hold sensitive information will clearly list, on the front cover, who can have access to the document. These documents will be stored securely.

## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting GSV combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made in the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082 upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

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

Detailed results of the field investigation will be provided in the draft ACHA report and AR. Additional field investigations of the lots which were inaccessible will be undertaken as part of the ACHA process.

### **Archaeological test excavations (if required)**

Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

The aims of the testing program are to:

- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).



- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- If the depth of deposit prevents reaching sterile deposits within the 50 by 50 centimetre test pit, additional 50 by 50 centimetre test pits may be excavated adjacent to the original test pit (for example expanding the test pit to 50 by 100 centimetres) to reach the sterile deposits.
- Test pits may be combined and excavated as necessary in 50 by 50 centimetre units for the purposes of further understanding site characteristics. Note that under the Code, the maximum area that can be excavated in any one continuous area is three metres squared (3 m<sup>2</sup>).
- The Code dictates that the maximum surface area of all test excavation units must be no greater than 0.5% of the PAD or area being investigated.
- All excavated soil will be sieved in 5 millimetre sieves. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Sydney Biosis office for analysis (at Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour and texture.
  - Amount and location of cultural material within the deposit.
  - Nature of disturbance where present.
  - Stratigraphy.
  - Archaeological features (if present).
  - Photographic records.
  - Spit records.
- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- In the event that suspected human remains are identified works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present with regard to their nature and significance.

*\*Enough information is defined by Heritage NSW as meaning “the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance. This may include things like locally or regionally high object density; presence of rare or representative objects; presence of archaeological features; or locally or regionally significant deposits stratified or not.”(DECCW 2010b, p.28).*

### **Storage of cultural material**

Any cultural material identified during test excavations will be temporarily stored in the Sydney Biosis office for analysis (Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).

Once the cultural material has been analysed, the cultural material can be managed in the following manners:

- Cultural material can be held by the Aboriginal community under a care and control agreement.
- Cultural material can be returned to country and reburied as soon as practicable in a secure location in accordance with Requirements 16b and 26 of the code.

**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**

## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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

The ACHA report will contain:

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

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

As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

The final report will incorporate all comments and will be forwarded on to RAPs once completed.

## References

AMBS 2006, *Volume 1: Aboriginal Heritage Management Plan: West Dapto Release Area*, An unpublished report to Wollongong City Council.

Artefact Heritage 2018, *Rezoning and subdivision of 109 Darkes Road, Kembla Grange*, Report to NewQuest Property Pty Ltd.

Biosis Pty Ltd 2015, *Lot 1, DP 825516, Farmborough Heights NSW. Aboriginal Cultural Heritage Assessment for Proposed Rezoning*, Report to Plannex Environmental Planning.

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

DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment and Climate Change, Sydney NSW.

OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.

2 August 2021

Goodradigbee Cultural & Heritage Aboriginal Corporation,  
Caine Carroll  
1 Morilla Road, East Kurrajong NSW 2758

Dear Caine ,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

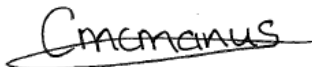
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely



Caitlin McManus  
Research Assistant



## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
58B	17288	211-217 Chandos Road, Horsley Park
58A	17288	203-209 Chandos Road, Horsley Park
57	13961	187-201 Chandos Road, Horsley Park
56	13961	171-185 Chandos Road, Horsley Park
A	361393	155-169 Chandos Road, Horsley Park
B	361393	137-153 Chandos Road, Horsley Park

Lot No.	Deposited Plan	Address
54	13961	121-135 Chandos Road, Horsley Park
59B	362022	143-155 Redmayne Road, Horsley Park
59A	362022	157-165 Redmayne Road, Horsley Park
1	505934	167-183 Redmayne Road, Horsley Park
2	505934	185-193 Redmayne Road, Horsley Park
61B	17288	195 Redmayne Road, Horsley Park
A	347034	203-210 Redmayne Road, Horsley Park
B	347034	215-223 Redmayne Road, Horsley Park
63	13961	225-245 Redmayne Road, Horsley Park
77	13961	120-134 Redmayne Road, Horsley Park
B	357890	136-142 Redmayne Road, Horsley Park
A	357890	144-150 Redmayne Road, Horsley Park
74B	17288	182-190 Redmayne Road, Horsley Park
74A	17288	200-206 Redmayne Road, Horsley Park
78B	347873	1671-1675 The Horsley Drive, Horsley Park
79A	17288	1667 The Horsley Drive, Horsley Park
79B	17288	1657-1665 The Horsley Drive, Horsley Park
1	849699	1637-1645 The Horsley Drive, Horsley Park
81A	348110	1627-1635 The Horsley Drive, Horsley Park
81B	348110	1617-1625 The Horsley Drive, Horsley Park
C	398446	1681 The Horsley Drive, Horsley Park
D	398446	1677-1679 The Horsley Drive, Horsley Park
A	394855	220 Redmayne Road, Horsley Park
B	394855	222-230 Redmayne Road, Horsley Park

## Background

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## Project schedule

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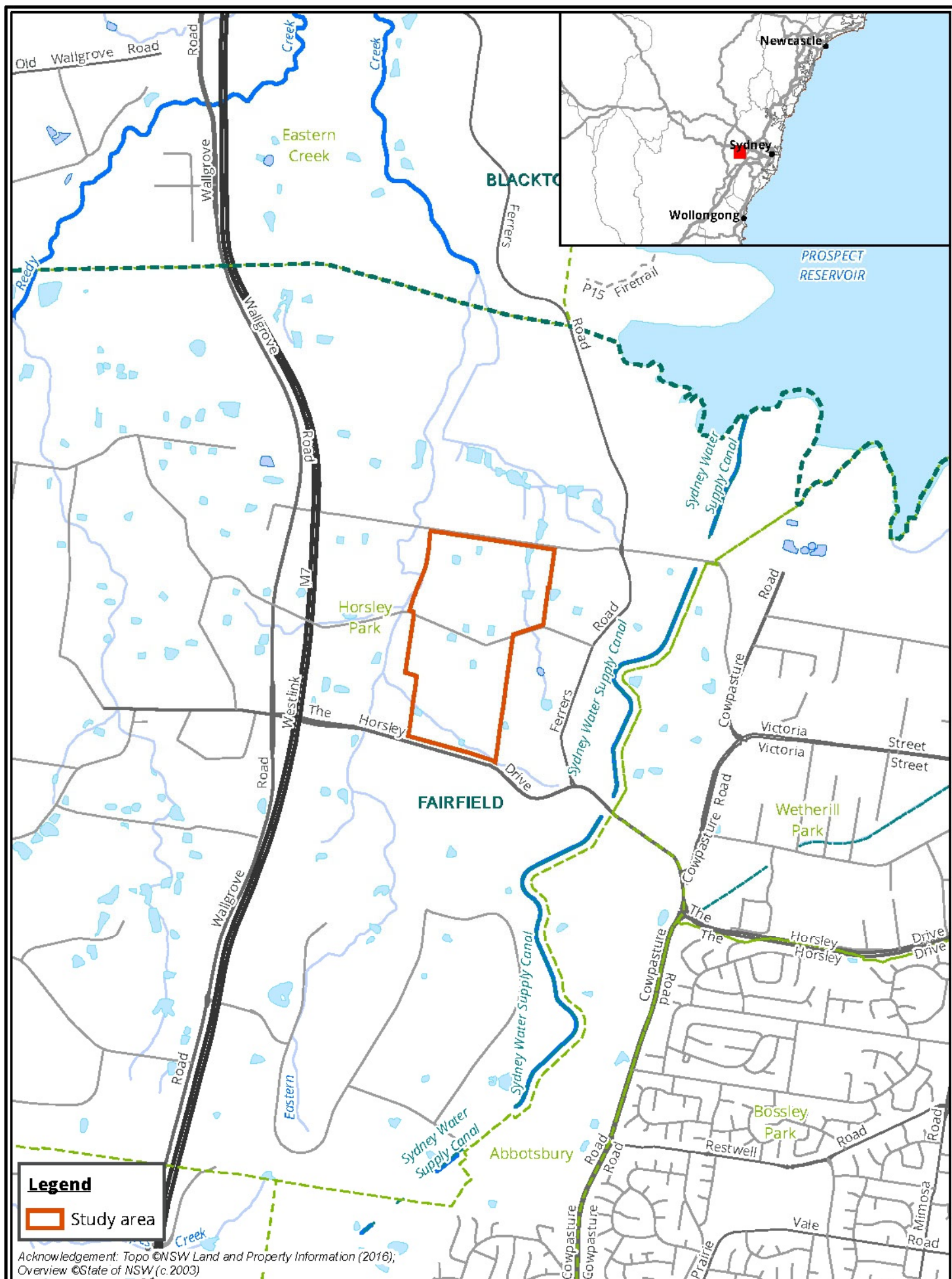
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**Figure 1 Location of the study area**





#### Legend

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Metres

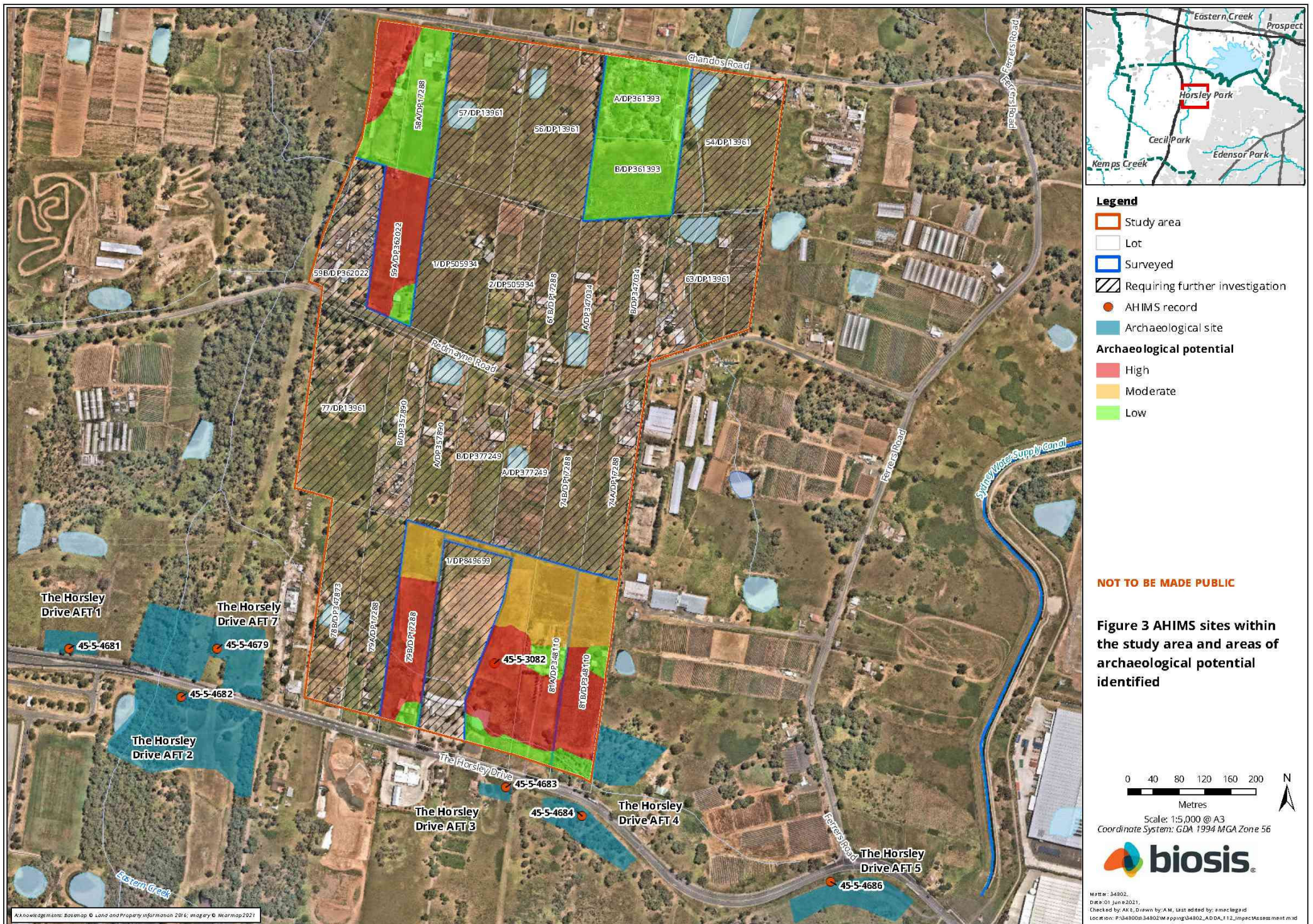
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## **Field investigation**

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- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
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The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

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- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).

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**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**



## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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The ACHA report will contain:

- Details of the Aboriginal consultation process undertaken as part of the assessment.
- A review and summary of the environmental context of the study area.
- A review and summary of the Aboriginal archaeological context of the study area.
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As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

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## References

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OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.

2 August 2021

Kamilaroi Yankuntjatjara Working Group  
Phil Khan  
78 Forbes Street, Emu Plains, NSW 2750

Dear Phil,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

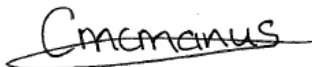
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely



Caitlin McManus  
Research Assistant

## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
58B	17288	211-217 Chandos Road, Horsley Park
58A	17288	203-209 Chandos Road, Horsley Park
57	13961	187-201 Chandos Road, Horsley Park
56	13961	171-185 Chandos Road, Horsley Park
A	361393	155-169 Chandos Road, Horsley Park
B	361393	137-153 Chandos Road, Horsley Park

Lot No.	Deposited Plan	Address
54	13961	121-135 Chandos Road, Horsley Park
59B	362022	143-155 Redmayne Road, Horsley Park
59A	362022	157-165 Redmayne Road, Horsley Park
1	505934	167-183 Redmayne Road, Horsley Park
2	505934	185-193 Redmayne Road, Horsley Park
61B	17288	195 Redmayne Road, Horsley Park
A	347034	203-210 Redmayne Road, Horsley Park
B	347034	215-223 Redmayne Road, Horsley Park
63	13961	225-245 Redmayne Road, Horsley Park
77	13961	120-134 Redmayne Road, Horsley Park
B	357890	136-142 Redmayne Road, Horsley Park
A	357890	144-150 Redmayne Road, Horsley Park
74B	17288	182-190 Redmayne Road, Horsley Park
74A	17288	200-206 Redmayne Road, Horsley Park
78B	347873	1671-1675 The Horsley Drive, Horsley Park
79A	17288	1667 The Horsley Drive, Horsley Park
79B	17288	1657-1665 The Horsley Drive, Horsley Park
1	849699	1637-1645 The Horsley Drive, Horsley Park
81A	348110	1627-1635 The Horsley Drive, Horsley Park
81B	348110	1617-1625 The Horsley Drive, Horsley Park
C	398446	1681 The Horsley Drive, Horsley Park
D	398446	1677-1679 The Horsley Drive, Horsley Park
A	394855	220 Redmayne Road, Horsley Park
B	394855	222-230 Redmayne Road, Horsley Park

## Background

Biosis conducted an Aboriginal Due Diligence Assessment for the study area in March 2021. A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client Service ID: 576371) identified 103 Aboriginal archaeological sites within a 3.5 by 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082) was identified within the southern portion of the study area, and four additional Potential Archaeological Deposits (PAD) sites (AHIMS 45-5-4679, 45-5-4682, 45-5-4683, and 45-5-4684) were located within 200 metres. These sites are located within close proximity to Eastern Creek and its associated tributaries, particularly the first order drainage line located within the southern portion of the study area. The sites are predominately silcrete based artefacts scatters, with silicified tuff, quartz, and fine grained siliceous material present and are located upon hillslope/creekflat landforms within 100 metres of fresh water sources.



The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

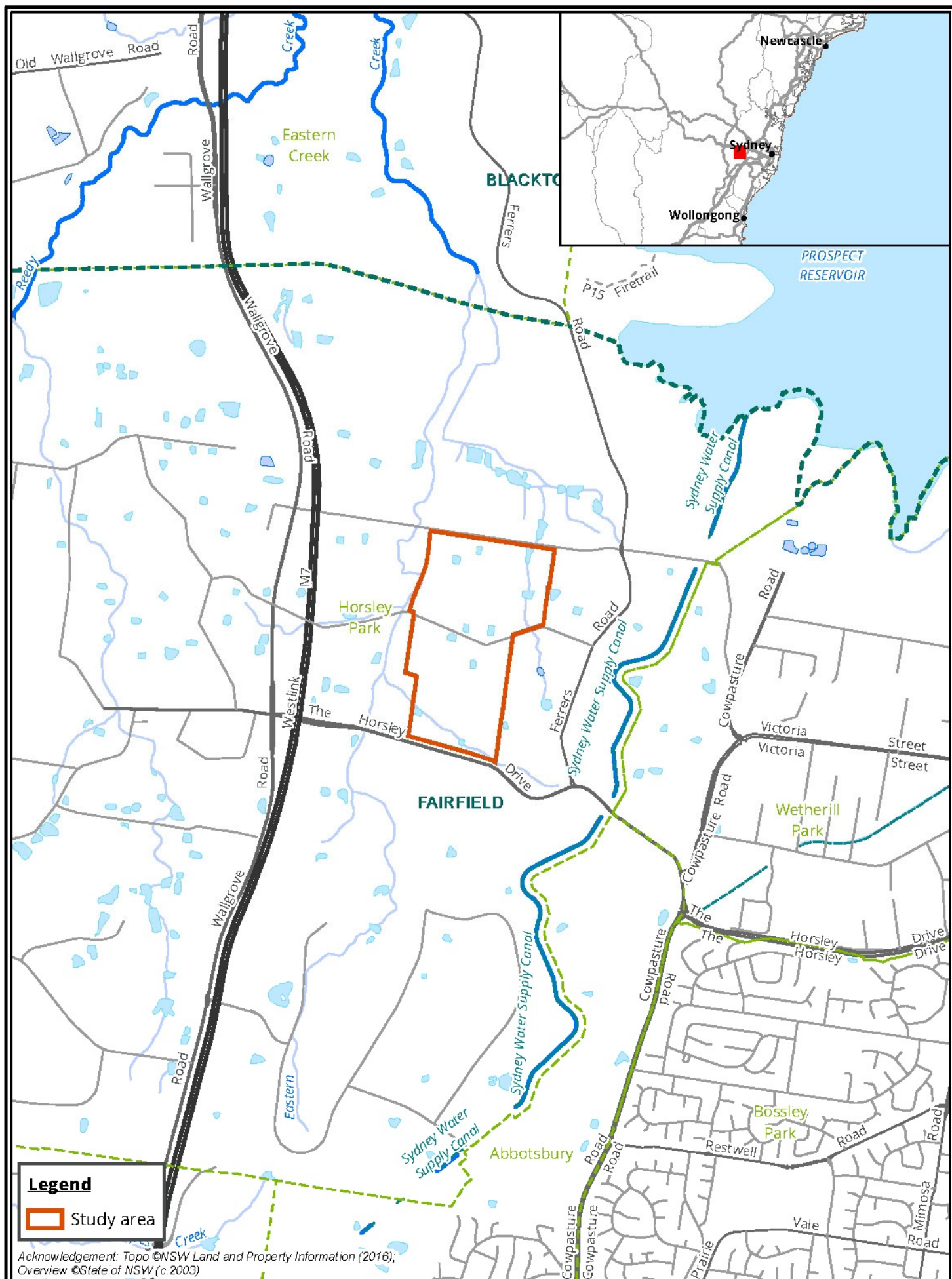
Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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



**Figure 1 Location of the study area**





#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

0 40 80 120 160 200

Metres

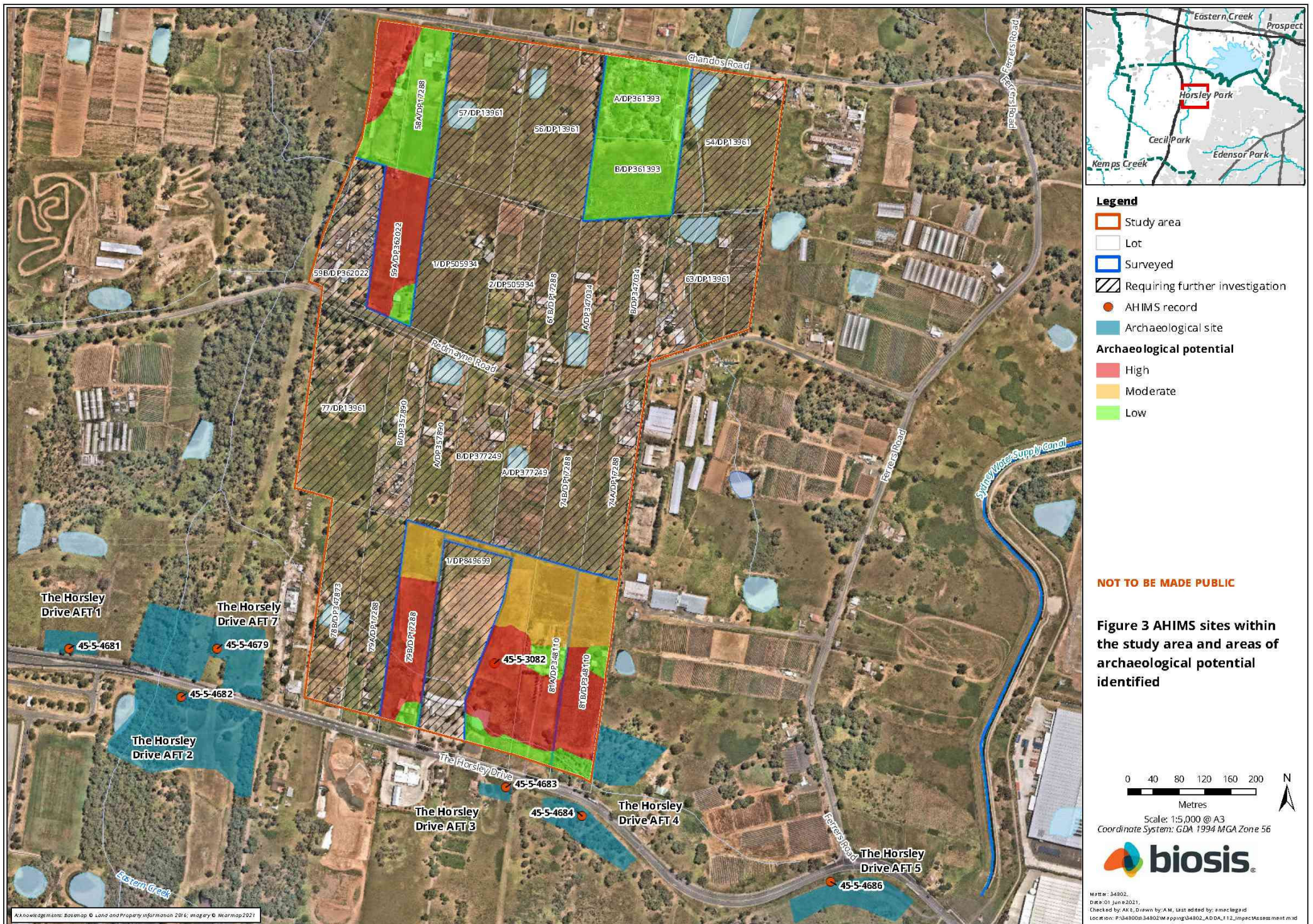
Scale: 1:5,000 @ A3

Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
 Date: 28 May 2021,  
 Checked by: AKE, Drawn by: LH, Last edited by: Barley  
 Location: P:\34800\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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



- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

## **Culturally sensitive material**

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OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.



2 August 2021

Tocomwall  
Scott Franks  
Po box 145, Miranda NSW 1490

Dear Scott,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

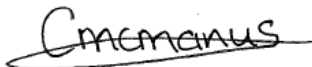
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely



Caitlin McManus  
Research Assistant

## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
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## Background

Biosis conducted an Aboriginal Due Diligence Assessment for the study area in March 2021. A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client Service ID: 576371) identified 103 Aboriginal archaeological sites within a 3.5 by 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082) was identified within the southern portion of the study area, and four additional Potential Archaeological Deposits (PAD) sites (AHIMS 45-5-4679, 45-5-4682, 45-5-4683, and 45-5-4684) were located within 200 metres. These sites are located within close proximity to Eastern Creek and its associated tributaries, particularly the first order drainage line located within the southern portion of the study area. The sites are predominately silcrete based artefacts scatters, with silicified tuff, quartz, and fine grained siliceous material present and are located upon hillslope/creekflat landforms within 100 metres of fresh water sources.

The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

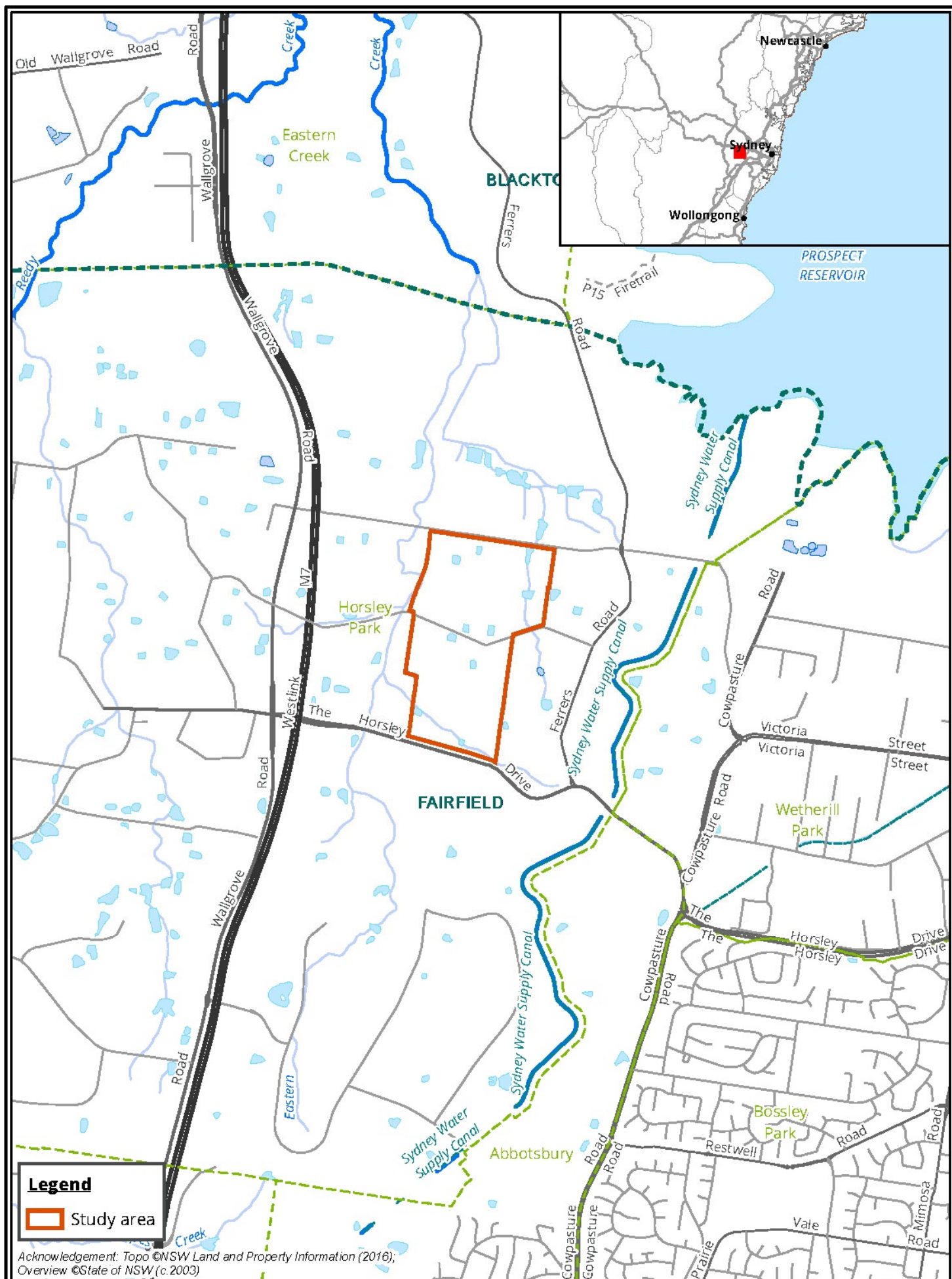
<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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





**Figure 1 Location of the study area**

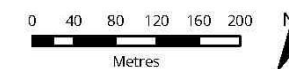




#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

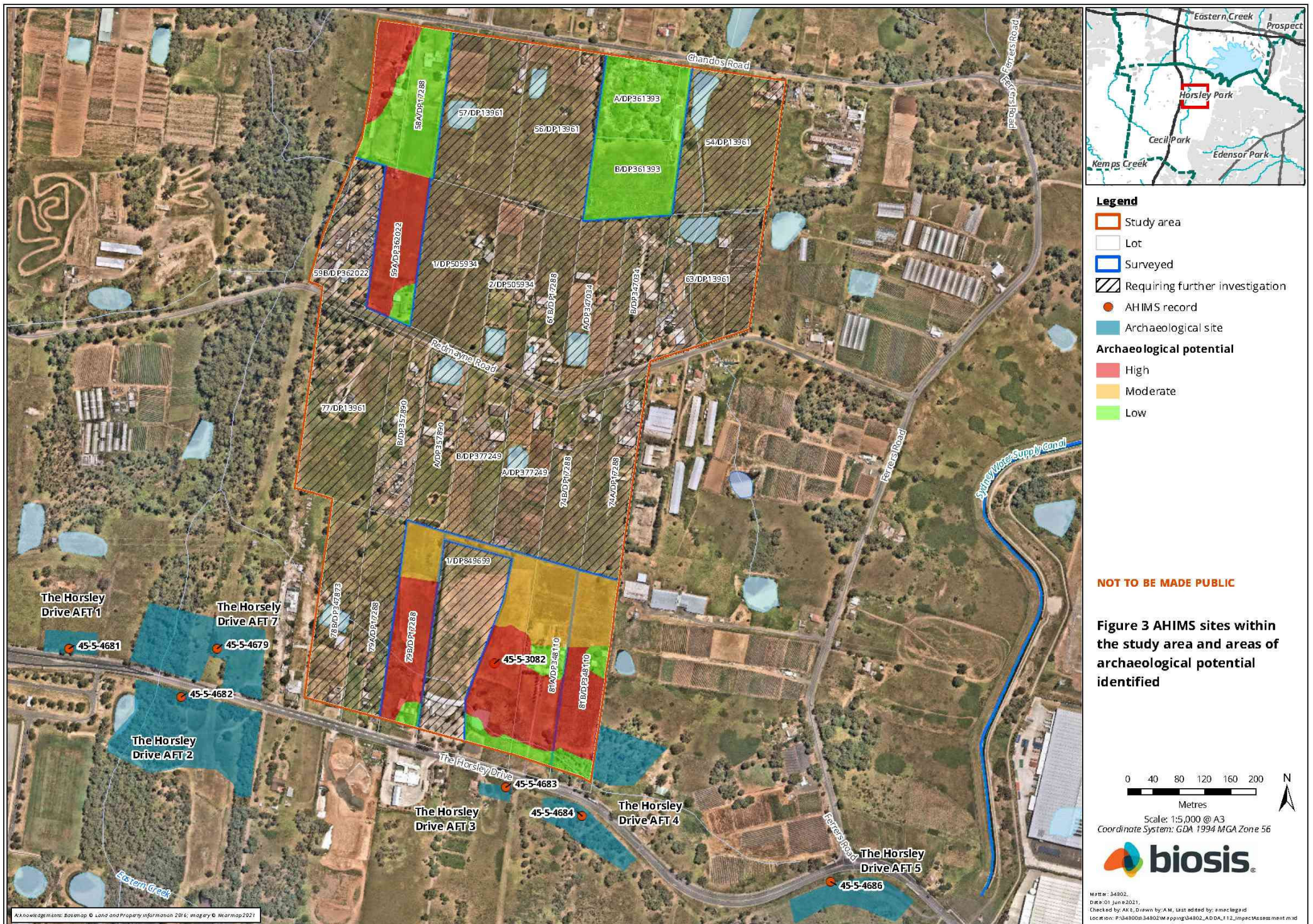


Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
Date: 28 May 2021,  
Checked by: AKE, Drawn by: LH, Last edited by: Barley  
Location: P:\34800\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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

- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

## **Culturally sensitive material**

Biosis invites RAPs to provide culturally appropriate information via mail, email or phone with regards to this project.

Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report. If the information is regarded as too sensitive to be made public then RAPs should advise Biosis and identify the nature of the sensitivity. Biosis will then arrange for the recording of the information in accordance with its sensitivity. Documents which hold sensitive information will clearly list, on the front cover, who can have access to the document. These documents will be stored securely.

## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting GSV combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made in the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082 upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

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

Detailed results of the field investigation will be provided in the draft ACHA report and AR. Additional field investigations of the lots which were inaccessible will be undertaken as part of the ACHA process.

### **Archaeological test excavations (if required)**

Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

The aims of the testing program are to:

- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).



- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- If the depth of deposit prevents reaching sterile deposits within the 50 by 50 centimetre test pit, additional 50 by 50 centimetre test pits may be excavated adjacent to the original test pit (for example expanding the test pit to 50 by 100 centimetres) to reach the sterile deposits.
- Test pits may be combined and excavated as necessary in 50 by 50 centimetre units for the purposes of further understanding site characteristics. Note that under the Code, the maximum area that can be excavated in any one continuous area is three metres squared (3 m<sup>2</sup>).
- The Code dictates that the maximum surface area of all test excavation units must be no greater than 0.5% of the PAD or area being investigated.
- All excavated soil will be sieved in 5 millimetre sieves. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Sydney Biosis office for analysis (at Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour and texture.
  - Amount and location of cultural material within the deposit.
  - Nature of disturbance where present.
  - Stratigraphy.
  - Archaeological features (if present).
  - Photographic records.
  - Spit records.
- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- In the event that suspected human remains are identified works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present with regard to their nature and significance.

*\*Enough information is defined by Heritage NSW as meaning “the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance. This may include things like locally or regionally high object density; presence of rare or representative objects; presence of archaeological features; or locally or regionally significant deposits stratified or not.”(DECCW 2010b, p.28).*

### **Storage of cultural material**

Any cultural material identified during test excavations will be temporarily stored in the Sydney Biosis office for analysis (Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).

Once the cultural material has been analysed, the cultural material can be managed in the following manners:

- Cultural material can be held by the Aboriginal community under a care and control agreement.
- Cultural material can be returned to country and reburied as soon as practicable in a secure location in accordance with Requirements 16b and 26 of the code.

**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**

## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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

The ACHA report will contain:

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

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

As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

The final report will incorporate all comments and will be forwarded on to RAPs once completed.

## References

AMBS 2006, *Volume 1: Aboriginal Heritage Management Plan: West Dapto Release Area*, An unpublished report to Wollongong City Council.

Artefact Heritage 2018, *Rezoning and subdivision of 109 Darkes Road, Kembla Grange*, Report to NewQuest Property Pty Ltd.

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2 August 2021

Waawaar Awaa Aboriginal Corporation  
Rodney & Barry Gunther  
15 Bungonia Street Prestons NSW 2170

Dear Rodney & Barry,

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**Our Ref: Matter: 34802**

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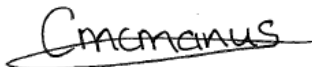
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The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

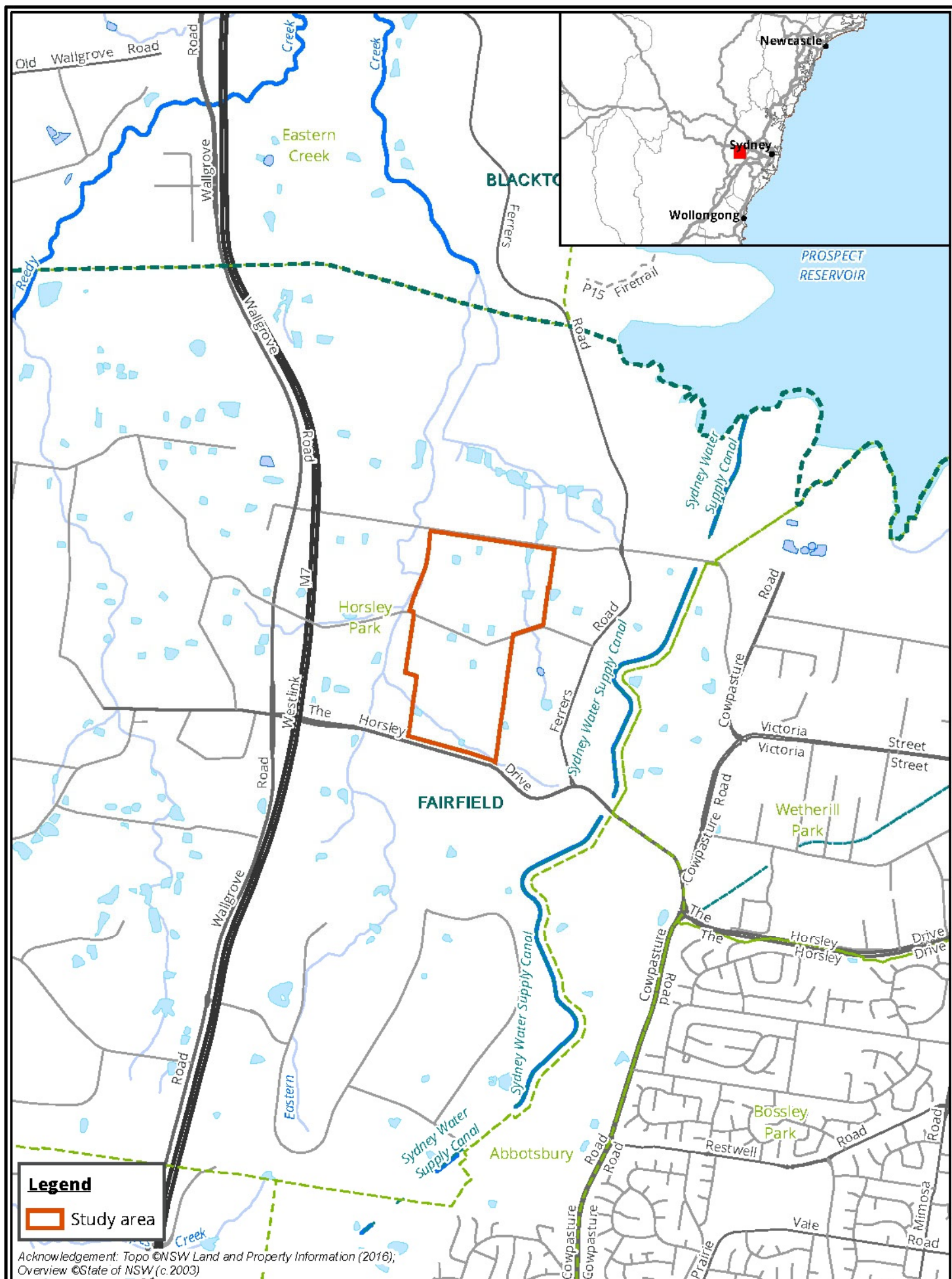
Action	Timeframe	Potential constraints and limitations
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<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
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<b>Archaeological test excavations (if required)</b>	TBC	TBC

<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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



**Figure 1 Location of the study area**





#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

0 40 80 120 160 200

Metres

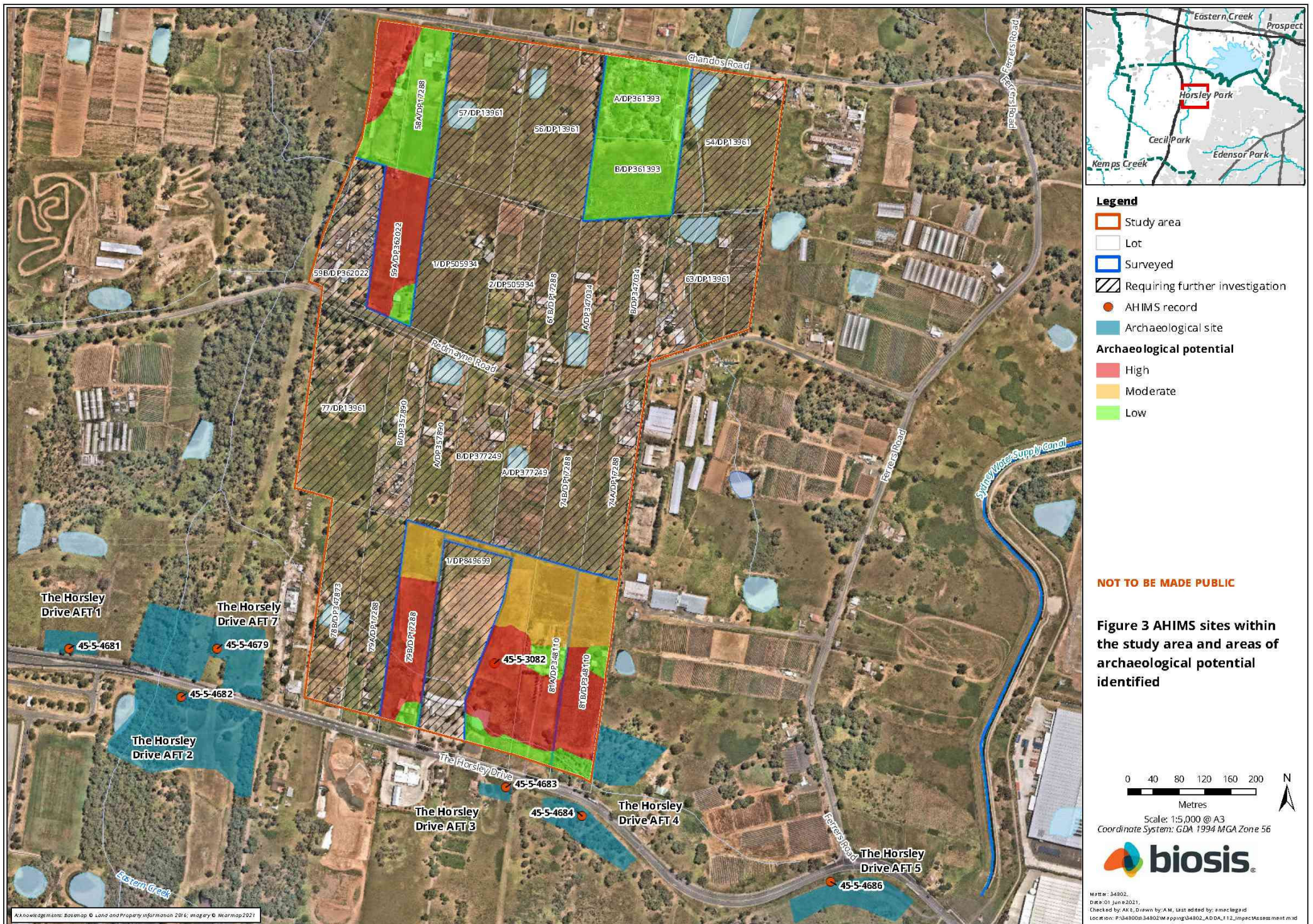
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Matter: 34802,  
 Date: 28 May 2021,  
 Checked by: AKE, Drawn by: LH, Last edited by: Barley  
 Location: P:\348006\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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

- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

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Biosis invites RAPs to provide culturally appropriate information via mail, email or phone with regards to this project.

Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report. If the information is regarded as too sensitive to be made public then RAPs should advise Biosis and identify the nature of the sensitivity. Biosis will then arrange for the recording of the information in accordance with its sensitivity. Documents which hold sensitive information will clearly list, on the front cover, who can have access to the document. These documents will be stored securely.

## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting GSV combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made in the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082 upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

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

Detailed results of the field investigation will be provided in the draft ACHA report and AR. Additional field investigations of the lots which were inaccessible will be undertaken as part of the ACHA process.

### **Archaeological test excavations (if required)**

Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

The aims of the testing program are to:

- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).



- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- If the depth of deposit prevents reaching sterile deposits within the 50 by 50 centimetre test pit, additional 50 by 50 centimetre test pits may be excavated adjacent to the original test pit (for example expanding the test pit to 50 by 100 centimetres) to reach the sterile deposits.
- Test pits may be combined and excavated as necessary in 50 by 50 centimetre units for the purposes of further understanding site characteristics. Note that under the Code, the maximum area that can be excavated in any one continuous area is three metres squared (3 m<sup>2</sup>).
- The Code dictates that the maximum surface area of all test excavation units must be no greater than 0.5% of the PAD or area being investigated.
- All excavated soil will be sieved in 5 millimetre sieves. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Sydney Biosis office for analysis (at Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour and texture.
  - Amount and location of cultural material within the deposit.
  - Nature of disturbance where present.
  - Stratigraphy.
  - Archaeological features (if present).
  - Photographic records.
  - Spit records.
- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- In the event that suspected human remains are identified works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present with regard to their nature and significance.

*\*Enough information is defined by Heritage NSW as meaning “the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance. This may include things like locally or regionally high object density; presence of rare or representative objects; presence of archaeological features; or locally or regionally significant deposits stratified or not.”(DECCW 2010b, p.28).*

### **Storage of cultural material**

Any cultural material identified during test excavations will be temporarily stored in the Sydney Biosis office for analysis (Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).

Once the cultural material has been analysed, the cultural material can be managed in the following manners:

- Cultural material can be held by the Aboriginal community under a care and control agreement.
- Cultural material can be returned to country and reburied as soon as practicable in a secure location in accordance with Requirements 16b and 26 of the code.

**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**

## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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

The ACHA report will contain:

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

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

As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

The final report will incorporate all comments and will be forwarded on to RAPs once completed.

## References

AMBS 2006, *Volume 1: Aboriginal Heritage Management Plan: West Dapto Release Area*, An unpublished report to Wollongong City Council.

Artefact Heritage 2018, *Rezoning and subdivision of 109 Darkes Road, Kembla Grange*, Report to NewQuest Property Pty Ltd.

Biosis Pty Ltd 2015, *Lot 1, DP 825516, Farmborough Heights NSW. Aboriginal Cultural Heritage Assessment for Proposed Rezoning*, Report to Plannex Environmental Planning.

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

DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment and Climate Change, Sydney NSW.

OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.

2 August 2021

Guntawang Aboriginal Resources Incorporated  
Wendy Morgan  
113 Reservoir Road Mt Pritchard NSW 2170

Dear Wendy ,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

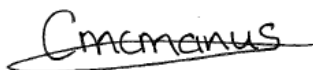
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely





Caitlin McManus  
Research Assistant

## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
58B	17288	211-217 Chandos Road, Horsley Park
58A	17288	203-209 Chandos Road, Horsley Park
57	13961	187-201 Chandos Road, Horsley Park
56	13961	171-185 Chandos Road, Horsley Park
A	361393	155-169 Chandos Road, Horsley Park
B	361393	137-153 Chandos Road, Horsley Park

Lot No.	Deposited Plan	Address
54	13961	121-135 Chandos Road, Horsley Park
59B	362022	143-155 Redmayne Road, Horsley Park
59A	362022	157-165 Redmayne Road, Horsley Park
1	505934	167-183 Redmayne Road, Horsley Park
2	505934	185-193 Redmayne Road, Horsley Park
61B	17288	195 Redmayne Road, Horsley Park
A	347034	203-210 Redmayne Road, Horsley Park
B	347034	215-223 Redmayne Road, Horsley Park
63	13961	225-245 Redmayne Road, Horsley Park
77	13961	120-134 Redmayne Road, Horsley Park
B	357890	136-142 Redmayne Road, Horsley Park
A	357890	144-150 Redmayne Road, Horsley Park
74B	17288	182-190 Redmayne Road, Horsley Park
74A	17288	200-206 Redmayne Road, Horsley Park
78B	347873	1671-1675 The Horsley Drive, Horsley Park
79A	17288	1667 The Horsley Drive, Horsley Park
79B	17288	1657-1665 The Horsley Drive, Horsley Park
1	849699	1637-1645 The Horsley Drive, Horsley Park
81A	348110	1627-1635 The Horsley Drive, Horsley Park
81B	348110	1617-1625 The Horsley Drive, Horsley Park
C	398446	1681 The Horsley Drive, Horsley Park
D	398446	1677-1679 The Horsley Drive, Horsley Park
A	394855	220 Redmayne Road, Horsley Park
B	394855	222-230 Redmayne Road, Horsley Park

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## Project schedule

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

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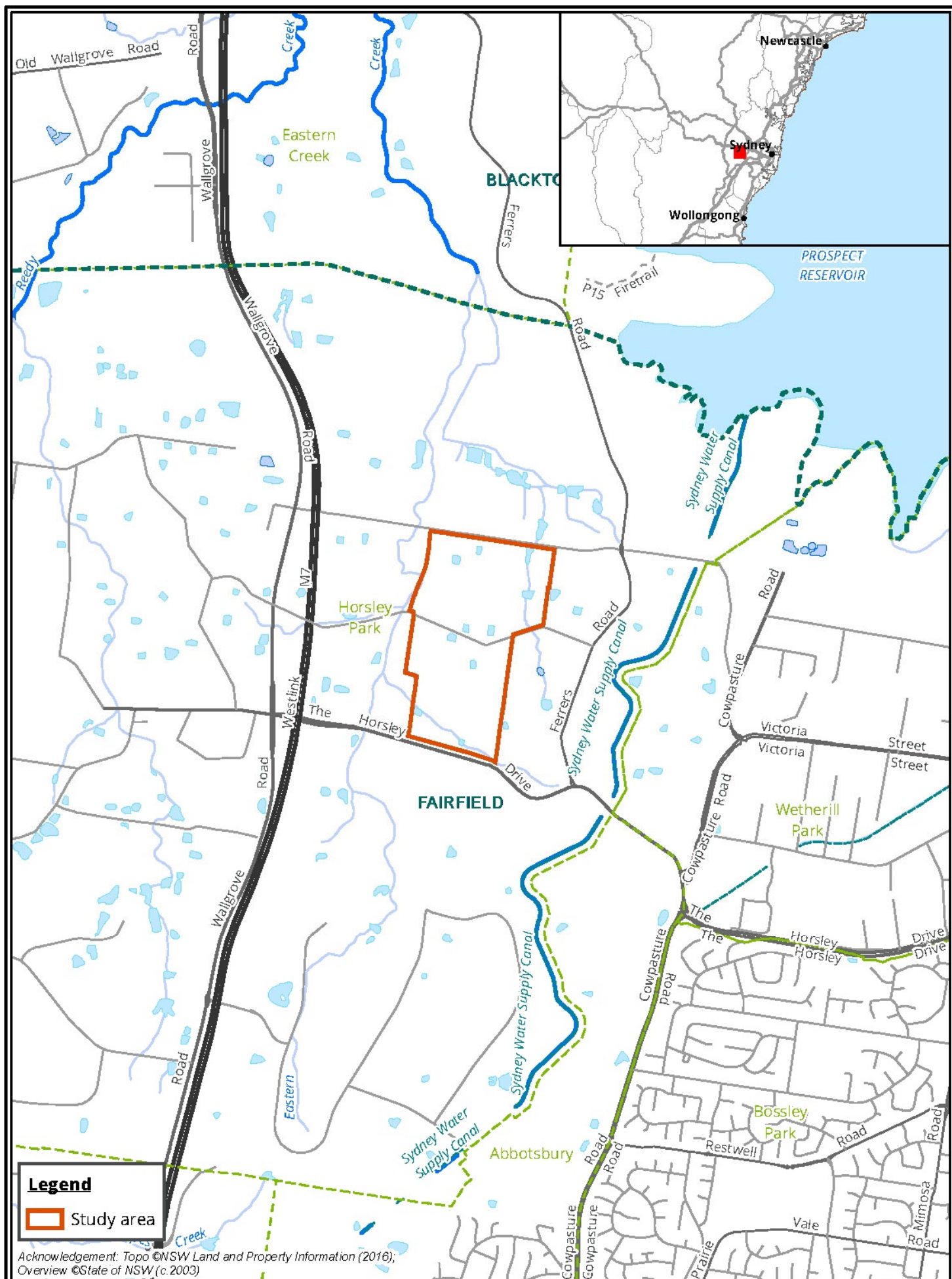
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**Figure 1 Location of the study area**





#### Legend

- Study area
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Metres

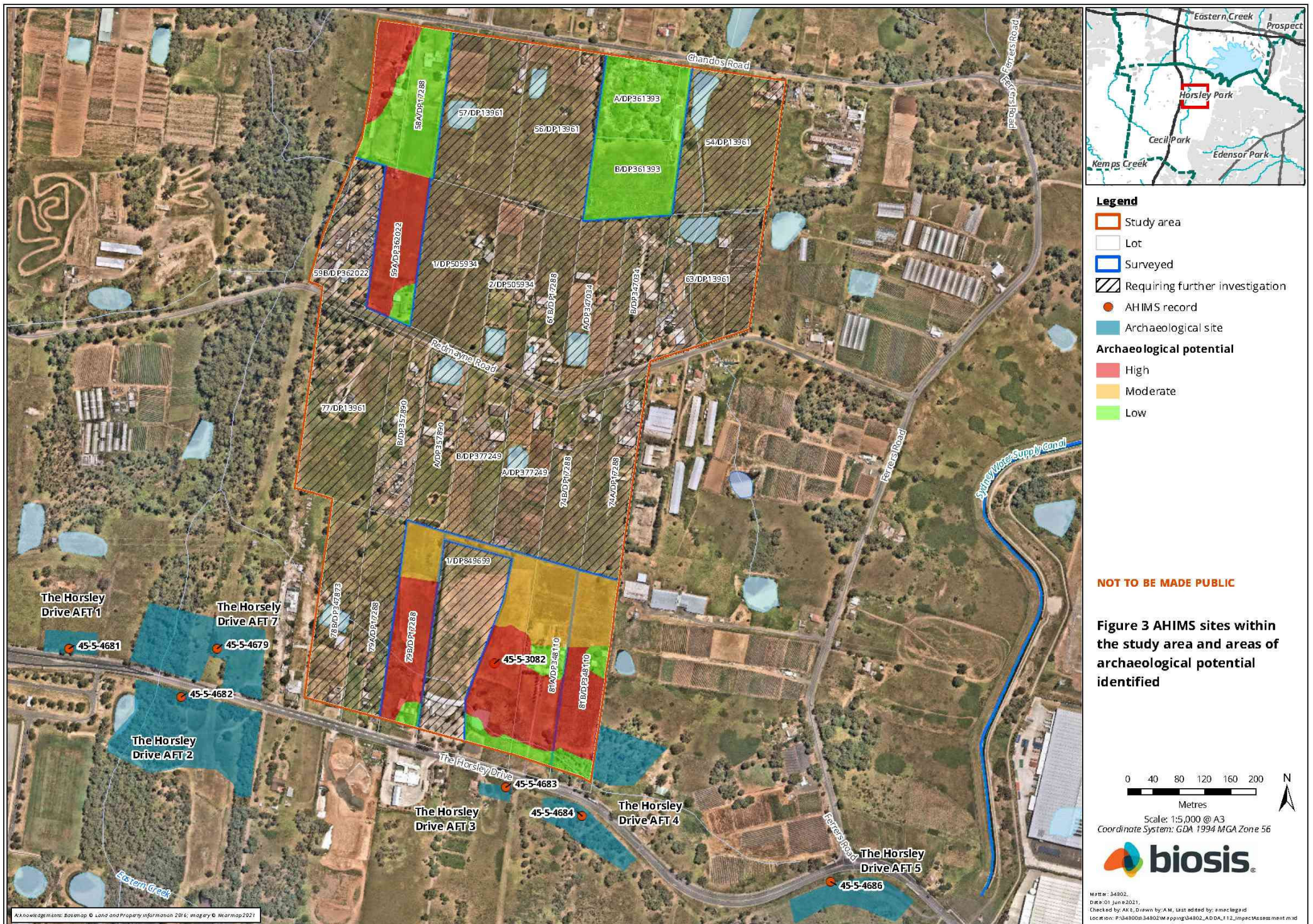
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## **Field investigation**

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.



- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
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Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

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- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).

- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- If the depth of deposit prevents reaching sterile deposits within the 50 by 50 centimetre test pit, additional 50 by 50 centimetre test pits may be excavated adjacent to the original test pit (for example expanding the test pit to 50 by 100 centimetres) to reach the sterile deposits.
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## Reporting

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The ACHA report will contain:

- Details of the Aboriginal consultation process undertaken as part of the assessment.
- A review and summary of the environmental context of the study area.
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- Archaeological test excavation results.
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As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

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## References

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OEHS 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.



2 August 2021

Butucarbin Aboriginal Corporation  
Jennifer Beale  
PO Box E18, Emerton, NSW 2770

Dear Jennifer,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

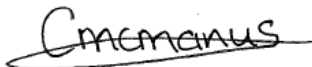
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely



Caitlin McManus  
Research Assistant

## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
58B	17288	211-217 Chandos Road, Horsley Park
58A	17288	203-209 Chandos Road, Horsley Park
57	13961	187-201 Chandos Road, Horsley Park
56	13961	171-185 Chandos Road, Horsley Park
A	361393	155-169 Chandos Road, Horsley Park
B	361393	137-153 Chandos Road, Horsley Park

Lot No.	Deposited Plan	Address
54	13961	121-135 Chandos Road, Horsley Park
59B	362022	143-155 Redmayne Road, Horsley Park
59A	362022	157-165 Redmayne Road, Horsley Park
1	505934	167-183 Redmayne Road, Horsley Park
2	505934	185-193 Redmayne Road, Horsley Park
61B	17288	195 Redmayne Road, Horsley Park
A	347034	203-210 Redmayne Road, Horsley Park
B	347034	215-223 Redmayne Road, Horsley Park
63	13961	225-245 Redmayne Road, Horsley Park
77	13961	120-134 Redmayne Road, Horsley Park
B	357890	136-142 Redmayne Road, Horsley Park
A	357890	144-150 Redmayne Road, Horsley Park
74B	17288	182-190 Redmayne Road, Horsley Park
74A	17288	200-206 Redmayne Road, Horsley Park
78B	347873	1671-1675 The Horsley Drive, Horsley Park
79A	17288	1667 The Horsley Drive, Horsley Park
79B	17288	1657-1665 The Horsley Drive, Horsley Park
1	849699	1637-1645 The Horsley Drive, Horsley Park
81A	348110	1627-1635 The Horsley Drive, Horsley Park
81B	348110	1617-1625 The Horsley Drive, Horsley Park
C	398446	1681 The Horsley Drive, Horsley Park
D	398446	1677-1679 The Horsley Drive, Horsley Park
A	394855	220 Redmayne Road, Horsley Park
B	394855	222-230 Redmayne Road, Horsley Park

## Background

Biosis conducted an Aboriginal Due Diligence Assessment for the study area in March 2021. A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client Service ID: 576371) identified 103 Aboriginal archaeological sites within a 3.5 by 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082) was identified within the southern portion of the study area, and four additional Potential Archaeological Deposits (PAD) sites (AHIMS 45-5-4679, 45-5-4682, 45-5-4683, and 45-5-4684) were located within 200 metres. These sites are located within close proximity to Eastern Creek and its associated tributaries, particularly the first order drainage line located within the southern portion of the study area. The sites are predominately silcrete based artefacts scatters, with silicified tuff, quartz, and fine grained siliceous material present and are located upon hillslope/creekflat landforms within 100 metres of fresh water sources.

The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

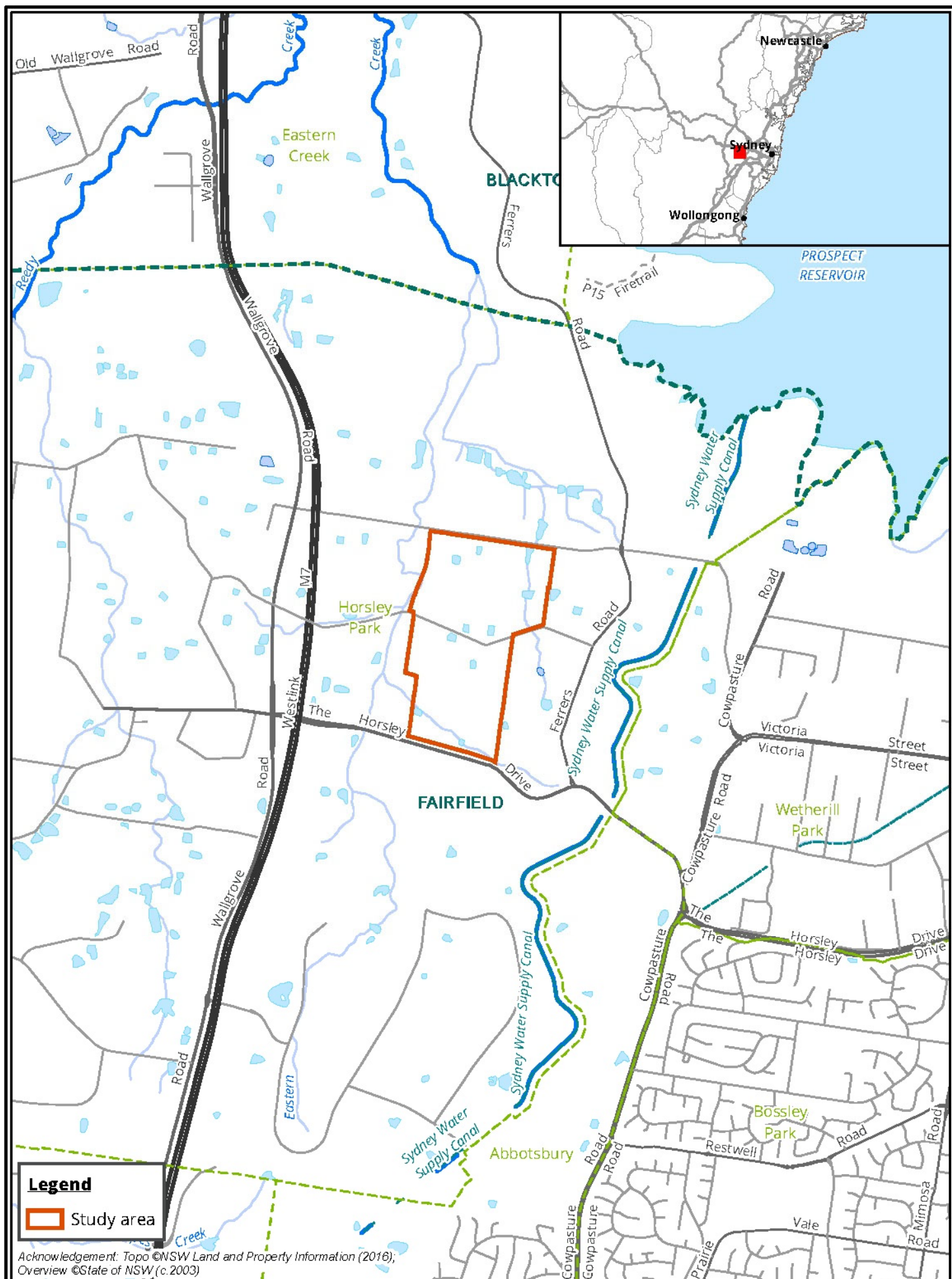


<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

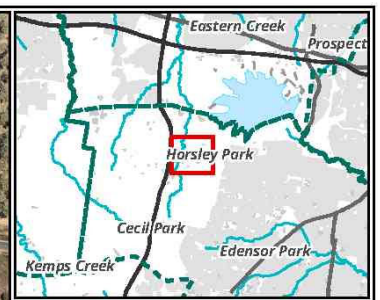
As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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



**Figure 1 Location of the study area**





#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

0 40 80 120 160 200

Metres

Scale: 1:5,000 @ A3

Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
 Date: 28 May 2021,  
 Checked by: AKE, Drawn by: LH, Last edited by: Barley  
 Location: P:\34800\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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



- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

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Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.

2 August 2021

Darug Custodian Aboriginal Corporation  
Justine Coplin  
PO Box 81, Windsor NSW 2756

Dear Justine ,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

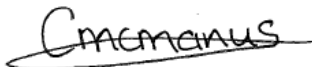
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely



Caitlin McManus  
Research Assistant

## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

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### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
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## Background

Biosis conducted an Aboriginal Due Diligence Assessment for the study area in March 2021. A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client Service ID: 576371) identified 103 Aboriginal archaeological sites within a 3.5 by 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082) was identified within the southern portion of the study area, and four additional Potential Archaeological Deposits (PAD) sites (AHIMS 45-5-4679, 45-5-4682, 45-5-4683, and 45-5-4684) were located within 200 metres. These sites are located within close proximity to Eastern Creek and its associated tributaries, particularly the first order drainage line located within the southern portion of the study area. The sites are predominately silcrete based artefacts scatters, with silicified tuff, quartz, and fine grained siliceous material present and are located upon hillslope/creekflat landforms within 100 metres of fresh water sources.



The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

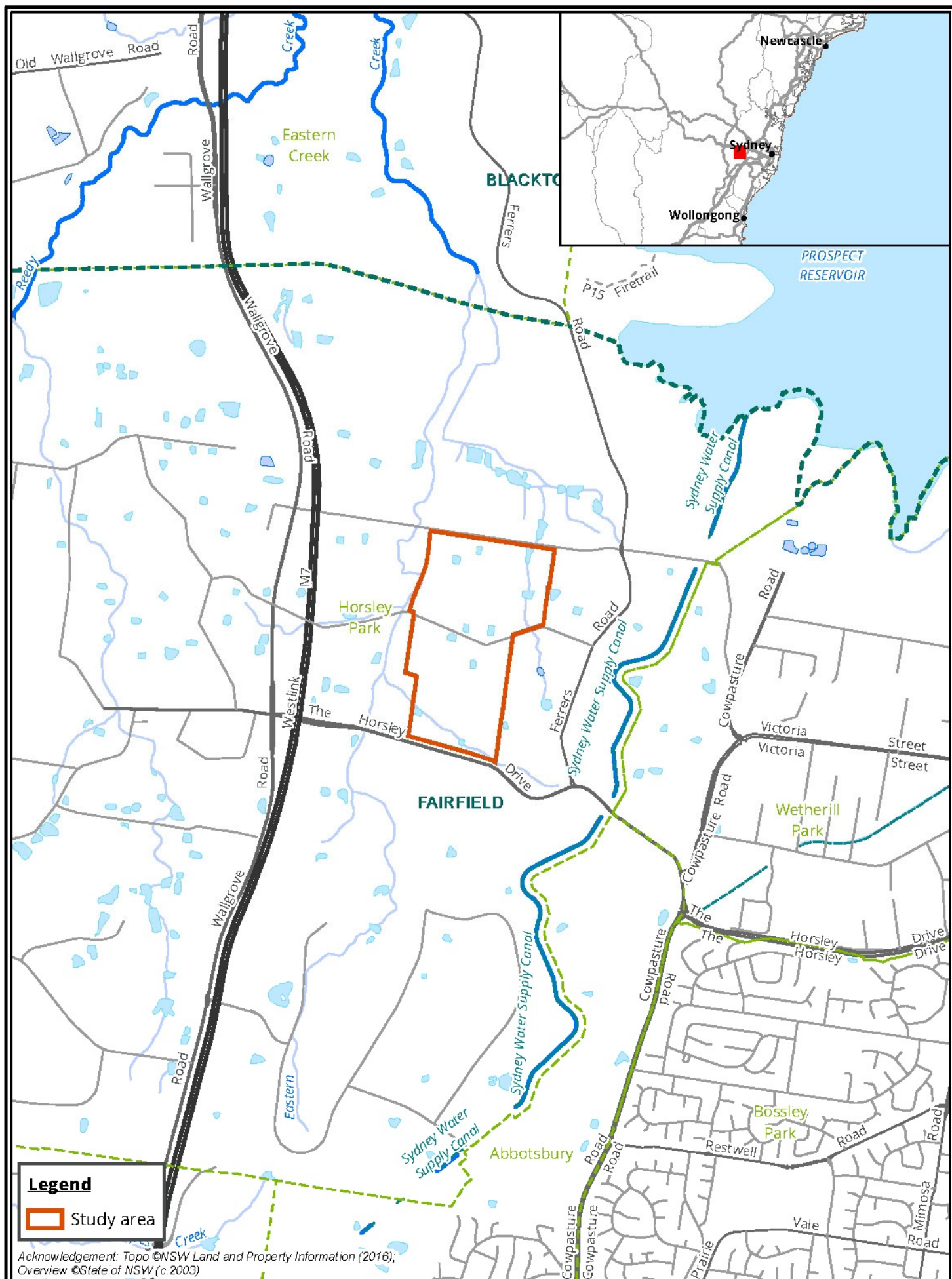
Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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



**Figure 1 Location of the study area**





#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

0 40 80 120 160 200

Metres

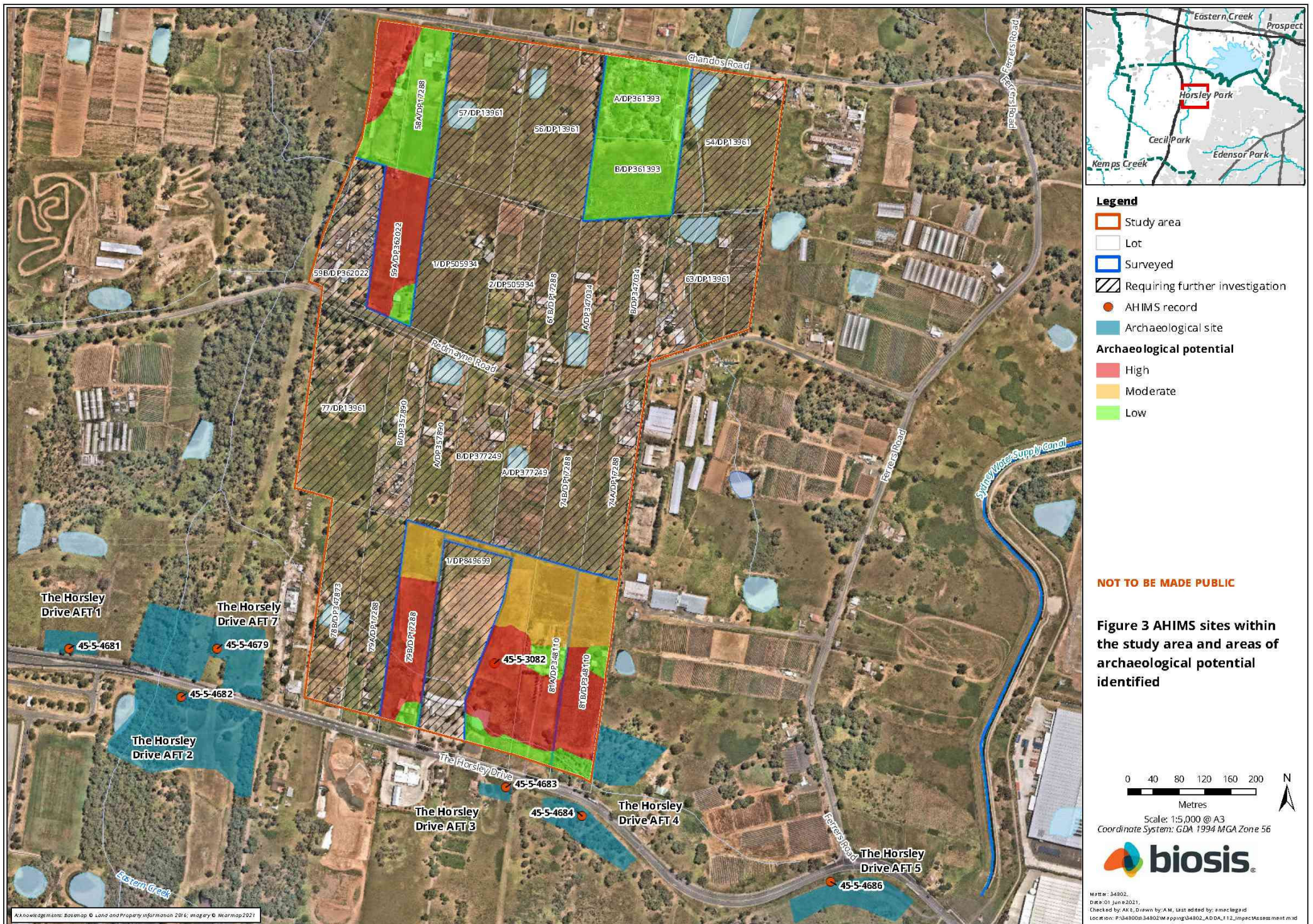
Scale: 1:5,000 @ A3

Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
 Date: 28 May 2021,  
 Checked by: AKE, Drawn by: LH, Last edited by: Barley  
 Location: P:\34800s\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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

- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

## **Culturally sensitive material**

Biosis invites RAPs to provide culturally appropriate information via mail, email or phone with regards to this project.

Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report. If the information is regarded as too sensitive to be made public then RAPs should advise Biosis and identify the nature of the sensitivity. Biosis will then arrange for the recording of the information in accordance with its sensitivity. Documents which hold sensitive information will clearly list, on the front cover, who can have access to the document. These documents will be stored securely.

## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting GSV combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made in the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082 upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

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

Detailed results of the field investigation will be provided in the draft ACHA report and AR. Additional field investigations of the lots which were inaccessible will be undertaken as part of the ACHA process.

### **Archaeological test excavations (if required)**

Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

The aims of the testing program are to:

- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).

- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- If the depth of deposit prevents reaching sterile deposits within the 50 by 50 centimetre test pit, additional 50 by 50 centimetre test pits may be excavated adjacent to the original test pit (for example expanding the test pit to 50 by 100 centimetres) to reach the sterile deposits.
- Test pits may be combined and excavated as necessary in 50 by 50 centimetre units for the purposes of further understanding site characteristics. Note that under the Code, the maximum area that can be excavated in any one continuous area is three metres squared (3 m<sup>2</sup>).
- The Code dictates that the maximum surface area of all test excavation units must be no greater than 0.5% of the PAD or area being investigated.
- All excavated soil will be sieved in 5 millimetre sieves. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Sydney Biosis office for analysis (at Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour and texture.
  - Amount and location of cultural material within the deposit.
  - Nature of disturbance where present.
  - Stratigraphy.
  - Archaeological features (if present).
  - Photographic records.
  - Spit records.
- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- In the event that suspected human remains are identified works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present with regard to their nature and significance.

*\*Enough information is defined by Heritage NSW as meaning “the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance. This may include things like locally or regionally high object density; presence of rare or representative objects; presence of archaeological features; or locally or regionally significant deposits stratified or not.”(DECCW 2010b, p.28).*

### **Storage of cultural material**

Any cultural material identified during test excavations will be temporarily stored in the Sydney Biosis office for analysis (Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).

Once the cultural material has been analysed, the cultural material can be managed in the following manners:

- Cultural material can be held by the Aboriginal community under a care and control agreement.
- Cultural material can be returned to country and reburied as soon as practicable in a secure location in accordance with Requirements 16b and 26 of the code.

**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**



## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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

The ACHA report will contain:

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

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

As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

The final report will incorporate all comments and will be forwarded on to RAPs once completed.

## References

AMBS 2006, *Volume 1: Aboriginal Heritage Management Plan: West Dapto Release Area*, An unpublished report to Wollongong City Council.

Artefact Heritage 2018, *Rezoning and subdivision of 109 Darkes Road, Kembla Grange*, Report to NewQuest Property Pty Ltd.

Biosis Pty Ltd 2015, *Lot 1, DP 825516, Farmborough Heights NSW. Aboriginal Cultural Heritage Assessment for Proposed Rezoning*, Report to Plannex Environmental Planning.

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2 August 2021

Didge Ngunawal Clan  
Lillie Carrol & Paul Boyd  
33 Carlyle Crescent Cambridge Gardens NSW 2747

Dear Lillie Carrol & Paul Boyd,

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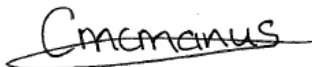
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The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

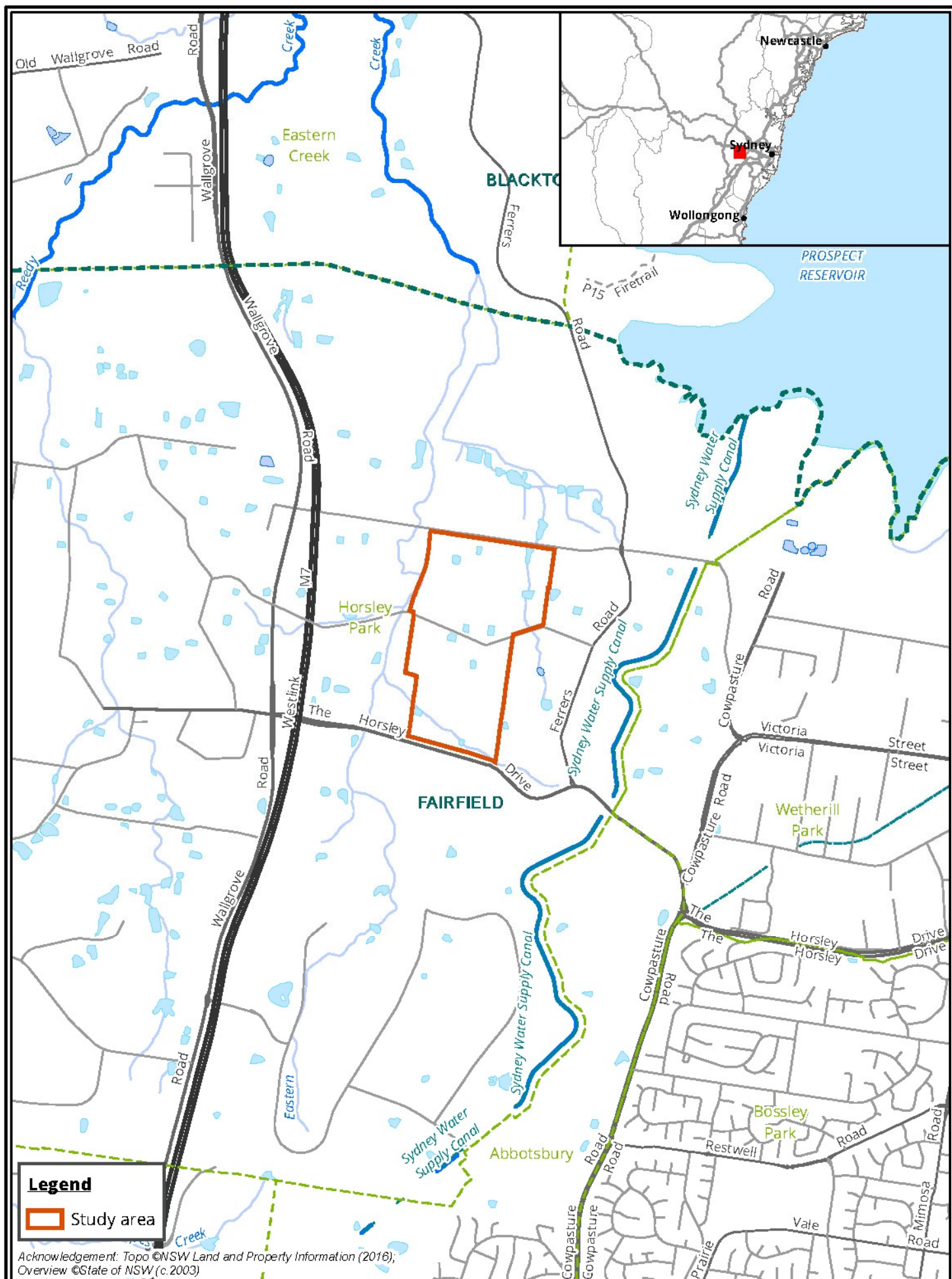
Action	Timeframe	Potential constraints and limitations
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<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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



**Figure 1 Location of the study area**





#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

0 40 80 120 160 200

Metres

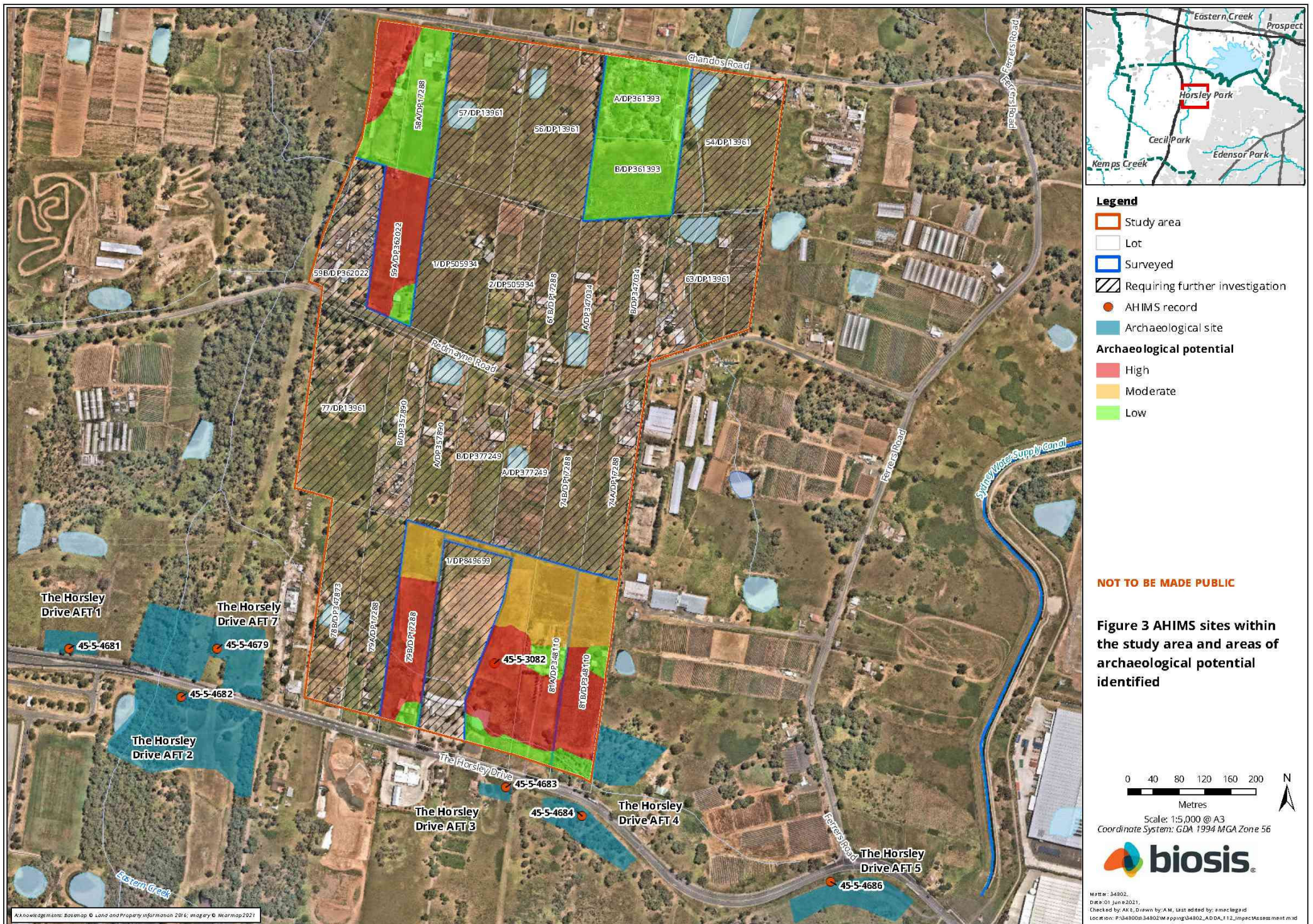
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Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
 Date: 28 May 2021,  
 Checked by: AKE, Drawn by: LH, Last edited by: Barley  
 Location: P:\34800\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

- A search of the AHIMS database will be completed to identify registered sites in the vicinity of the assessment/study area. The results of the AHIMS search will be used to obtain relevant site cards and relevant previously completed Aboriginal cultural heritage assessments.
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- A review of the historical heritage databases will be undertaken.
- A brief summary of the historical uses of the study area will be developed.

### Consultation with the Aboriginal community

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

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

- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
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## **Culturally sensitive material**

Biosis invites RAPs to provide culturally appropriate information via mail, email or phone with regards to this project.

Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report. If the information is regarded as too sensitive to be made public then RAPs should advise Biosis and identify the nature of the sensitivity. Biosis will then arrange for the recording of the information in accordance with its sensitivity. Documents which hold sensitive information will clearly list, on the front cover, who can have access to the document. These documents will be stored securely.

## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting GSV combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made in the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082 upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

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

Detailed results of the field investigation will be provided in the draft ACHA report and AR. Additional field investigations of the lots which were inaccessible will be undertaken as part of the ACHA process.

### **Archaeological test excavations (if required)**

Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

The aims of the testing program are to:

- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).

- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- If the depth of deposit prevents reaching sterile deposits within the 50 by 50 centimetre test pit, additional 50 by 50 centimetre test pits may be excavated adjacent to the original test pit (for example expanding the test pit to 50 by 100 centimetres) to reach the sterile deposits.
- Test pits may be combined and excavated as necessary in 50 by 50 centimetre units for the purposes of further understanding site characteristics. Note that under the Code, the maximum area that can be excavated in any one continuous area is three metres squared (3 m<sup>2</sup>).
- The Code dictates that the maximum surface area of all test excavation units must be no greater than 0.5% of the PAD or area being investigated.
- All excavated soil will be sieved in 5 millimetre sieves. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Sydney Biosis office for analysis (at Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour and texture.
  - Amount and location of cultural material within the deposit.
  - Nature of disturbance where present.
  - Stratigraphy.
  - Archaeological features (if present).
  - Photographic records.
  - Spit records.
- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- In the event that suspected human remains are identified works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present with regard to their nature and significance.

*\*Enough information is defined by Heritage NSW as meaning “the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance. This may include things like locally or regionally high object density; presence of rare or representative objects; presence of archaeological features; or locally or regionally significant deposits stratified or not.”(DECCW 2010b, p.28).*



### **Storage of cultural material**

Any cultural material identified during test excavations will be temporarily stored in the Sydney Biosis office for analysis (Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).

Once the cultural material has been analysed, the cultural material can be managed in the following manners:

- Cultural material can be held by the Aboriginal community under a care and control agreement.
- Cultural material can be returned to country and reburied as soon as practicable in a secure location in accordance with Requirements 16b and 26 of the code.

**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**

## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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

The ACHA report will contain:

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

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

As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

The final report will incorporate all comments and will be forwarded on to RAPs once completed.

## References

AMBS 2006, *Volume 1: Aboriginal Heritage Management Plan: West Dapto Release Area*, An unpublished report to Wollongong City Council.

Artefact Heritage 2018, *Rezoning and subdivision of 109 Darkes Road, Kembla Grange*, Report to NewQuest Property Pty Ltd.

Biosis Pty Ltd 2015, *Lot 1, DP 825516, Farmborough Heights NSW. Aboriginal Cultural Heritage Assessment for Proposed Rezoning*, Report to Plannex Environmental Planning.

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

DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment and Climate Change, Sydney NSW.

OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.

2 August 2021

Widescope Indigenous Group  
Steven & Donna Hickey  
73 Russell Street, Emu Plains, NSW 2750

Dear Steven & Donna,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

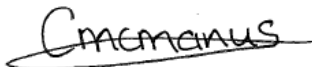
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely



Caitlin McManus  
Research Assistant



## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
58B	17288	211-217 Chandos Road, Horsley Park
58A	17288	203-209 Chandos Road, Horsley Park
57	13961	187-201 Chandos Road, Horsley Park
56	13961	171-185 Chandos Road, Horsley Park
A	361393	155-169 Chandos Road, Horsley Park
B	361393	137-153 Chandos Road, Horsley Park

Lot No.	Deposited Plan	Address
54	13961	121-135 Chandos Road, Horsley Park
59B	362022	143-155 Redmayne Road, Horsley Park
59A	362022	157-165 Redmayne Road, Horsley Park
1	505934	167-183 Redmayne Road, Horsley Park
2	505934	185-193 Redmayne Road, Horsley Park
61B	17288	195 Redmayne Road, Horsley Park
A	347034	203-210 Redmayne Road, Horsley Park
B	347034	215-223 Redmayne Road, Horsley Park
63	13961	225-245 Redmayne Road, Horsley Park
77	13961	120-134 Redmayne Road, Horsley Park
B	357890	136-142 Redmayne Road, Horsley Park
A	357890	144-150 Redmayne Road, Horsley Park
74B	17288	182-190 Redmayne Road, Horsley Park
74A	17288	200-206 Redmayne Road, Horsley Park
78B	347873	1671-1675 The Horsley Drive, Horsley Park
79A	17288	1667 The Horsley Drive, Horsley Park
79B	17288	1657-1665 The Horsley Drive, Horsley Park
1	849699	1637-1645 The Horsley Drive, Horsley Park
81A	348110	1627-1635 The Horsley Drive, Horsley Park
81B	348110	1617-1625 The Horsley Drive, Horsley Park
C	398446	1681 The Horsley Drive, Horsley Park
D	398446	1677-1679 The Horsley Drive, Horsley Park
A	394855	220 Redmayne Road, Horsley Park
B	394855	222-230 Redmayne Road, Horsley Park

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## Project schedule

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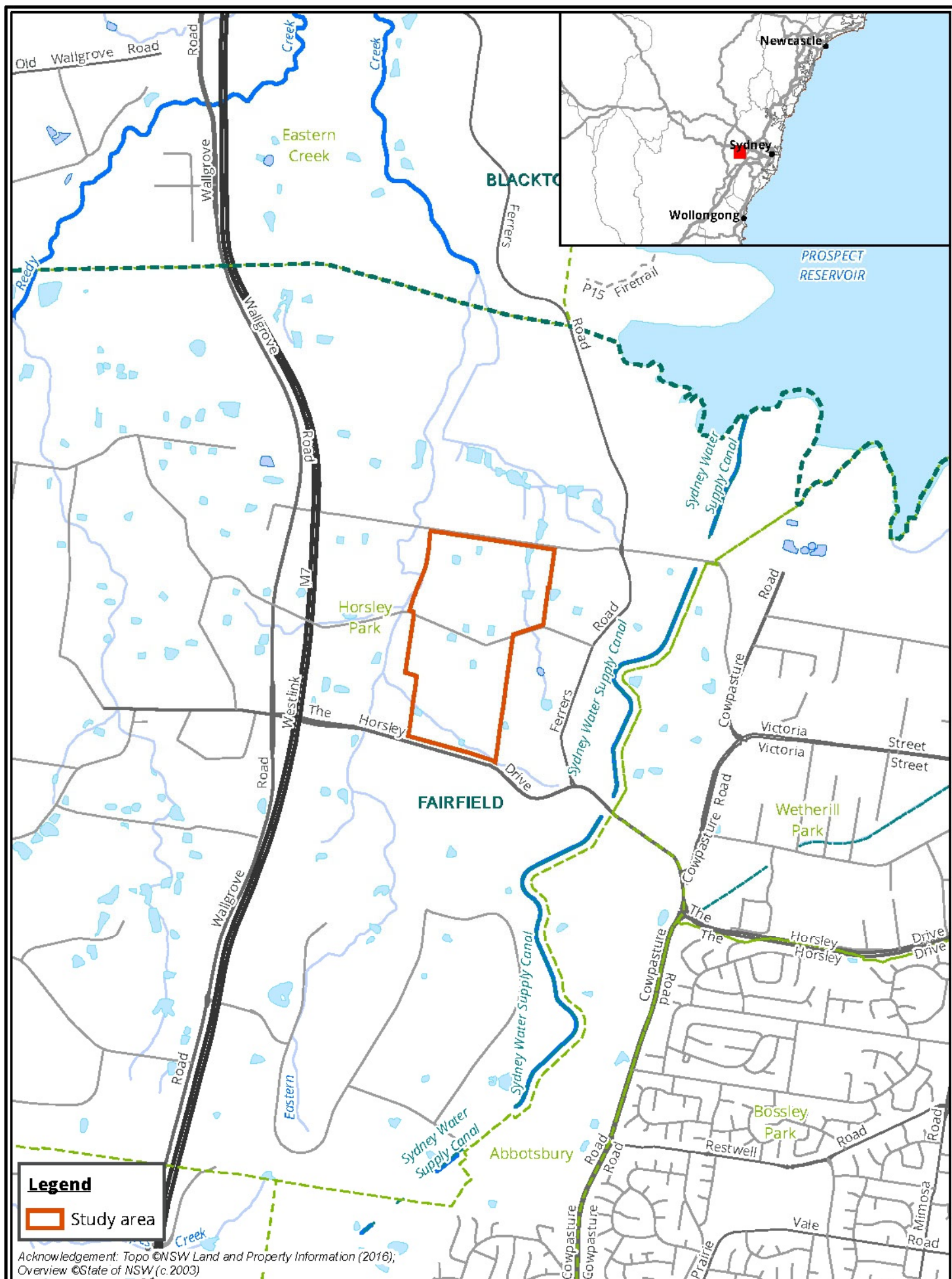
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**Figure 1 Location of the study area**

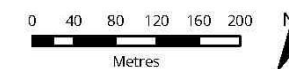




#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

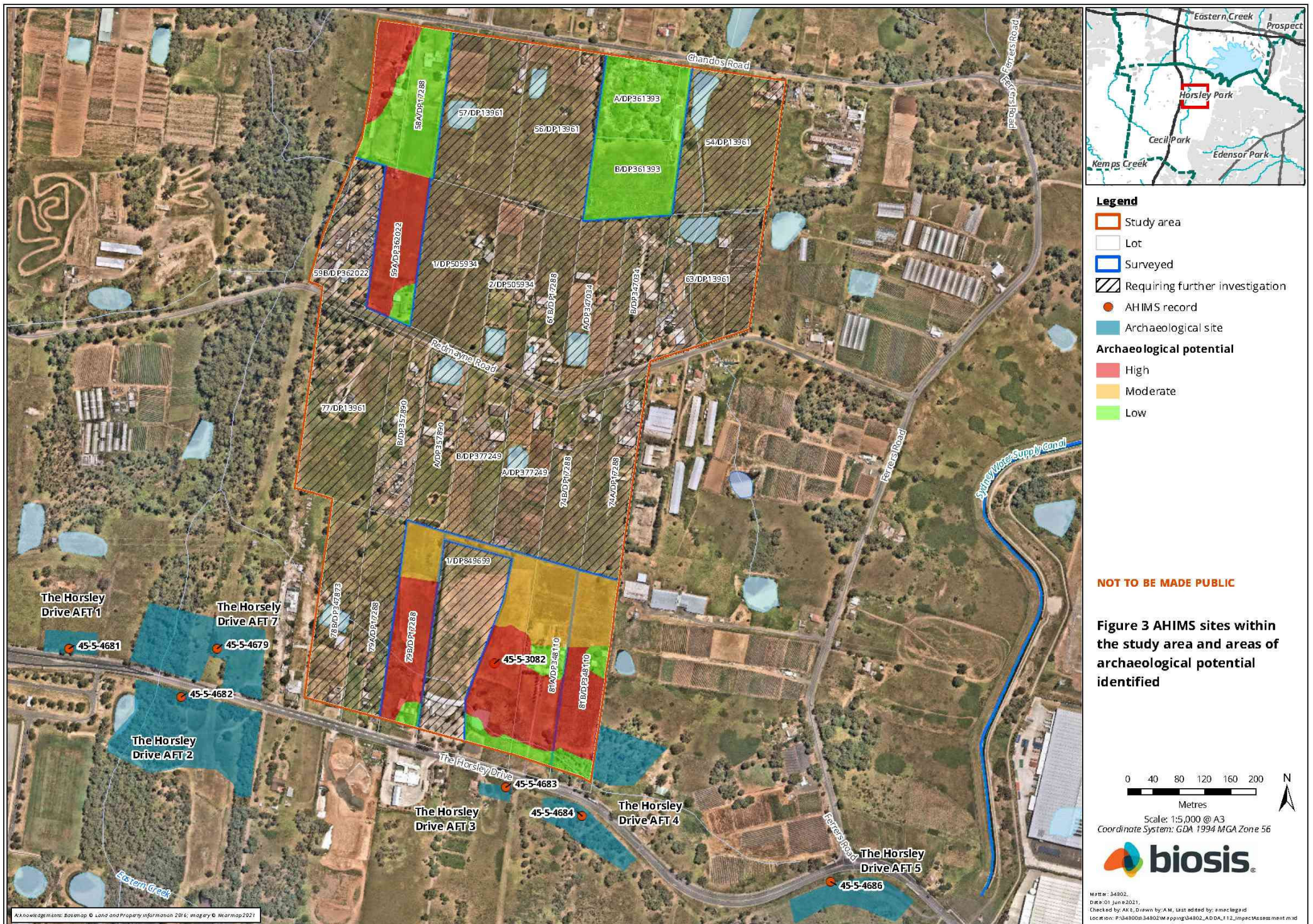


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## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

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- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
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Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

The aims of the testing program are to:

- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).



- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
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**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**

## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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The ACHA report will contain:

- Details of the Aboriginal consultation process undertaken as part of the assessment.
- A review and summary of the environmental context of the study area.
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As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

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## References

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Biosis Pty Ltd 2015, *Lot 1, DP 825516, Farmborough Heights NSW. Aboriginal Cultural Heritage Assessment for Proposed Rezoning*, Report to Plannex Environmental Planning.

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

DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment and Climate Change, Sydney NSW.

OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.

10 August 2021

Murra Bidgee Mullangari Aboriginal Corporation  
Darleen & Ryan Johnson  
PO Box 3035 Rouse Hill NSW 2765

Dear Darleen & Ryan,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

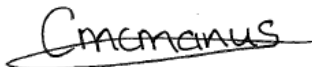
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely





Caitlin McManus  
Research Assistant

## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
58B	17288	211-217 Chandos Road, Horsley Park
58A	17288	203-209 Chandos Road, Horsley Park
57	13961	187-201 Chandos Road, Horsley Park
56	13961	171-185 Chandos Road, Horsley Park
A	361393	155-169 Chandos Road, Horsley Park
B	361393	137-153 Chandos Road, Horsley Park

Lot No.	Deposited Plan	Address
54	13961	121-135 Chandos Road, Horsley Park
59B	362022	143-155 Redmayne Road, Horsley Park
59A	362022	157-165 Redmayne Road, Horsley Park
1	505934	167-183 Redmayne Road, Horsley Park
2	505934	185-193 Redmayne Road, Horsley Park
61B	17288	195 Redmayne Road, Horsley Park
A	347034	203-210 Redmayne Road, Horsley Park
B	347034	215-223 Redmayne Road, Horsley Park
63	13961	225-245 Redmayne Road, Horsley Park
77	13961	120-134 Redmayne Road, Horsley Park
B	357890	136-142 Redmayne Road, Horsley Park
A	357890	144-150 Redmayne Road, Horsley Park
74B	17288	182-190 Redmayne Road, Horsley Park
74A	17288	200-206 Redmayne Road, Horsley Park
78B	347873	1671-1675 The Horsley Drive, Horsley Park
79A	17288	1667 The Horsley Drive, Horsley Park
79B	17288	1657-1665 The Horsley Drive, Horsley Park
1	849699	1637-1645 The Horsley Drive, Horsley Park
81A	348110	1627-1635 The Horsley Drive, Horsley Park
81B	348110	1617-1625 The Horsley Drive, Horsley Park
C	398446	1681 The Horsley Drive, Horsley Park
D	398446	1677-1679 The Horsley Drive, Horsley Park
A	394855	220 Redmayne Road, Horsley Park
B	394855	222-230 Redmayne Road, Horsley Park

## Background

Biosis conducted an Aboriginal Due Diligence Assessment for the study area in March 2021. A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client Service ID: 576371) identified 103 Aboriginal archaeological sites within a 3.5 by 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082) was identified within the southern portion of the study area, and four additional Potential Archaeological Deposits (PAD) sites (AHIMS 45-5-4679, 45-5-4682, 45-5-4683, and 45-5-4684) were located within 200 metres. These sites are located within close proximity to Eastern Creek and its associated tributaries, particularly the first order drainage line located within the southern portion of the study area. The sites are predominately silcrete based artefacts scatters, with silicified tuff, quartz, and fine grained siliceous material present and are located upon hillslope/creekflat landforms within 100 metres of fresh water sources.

The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

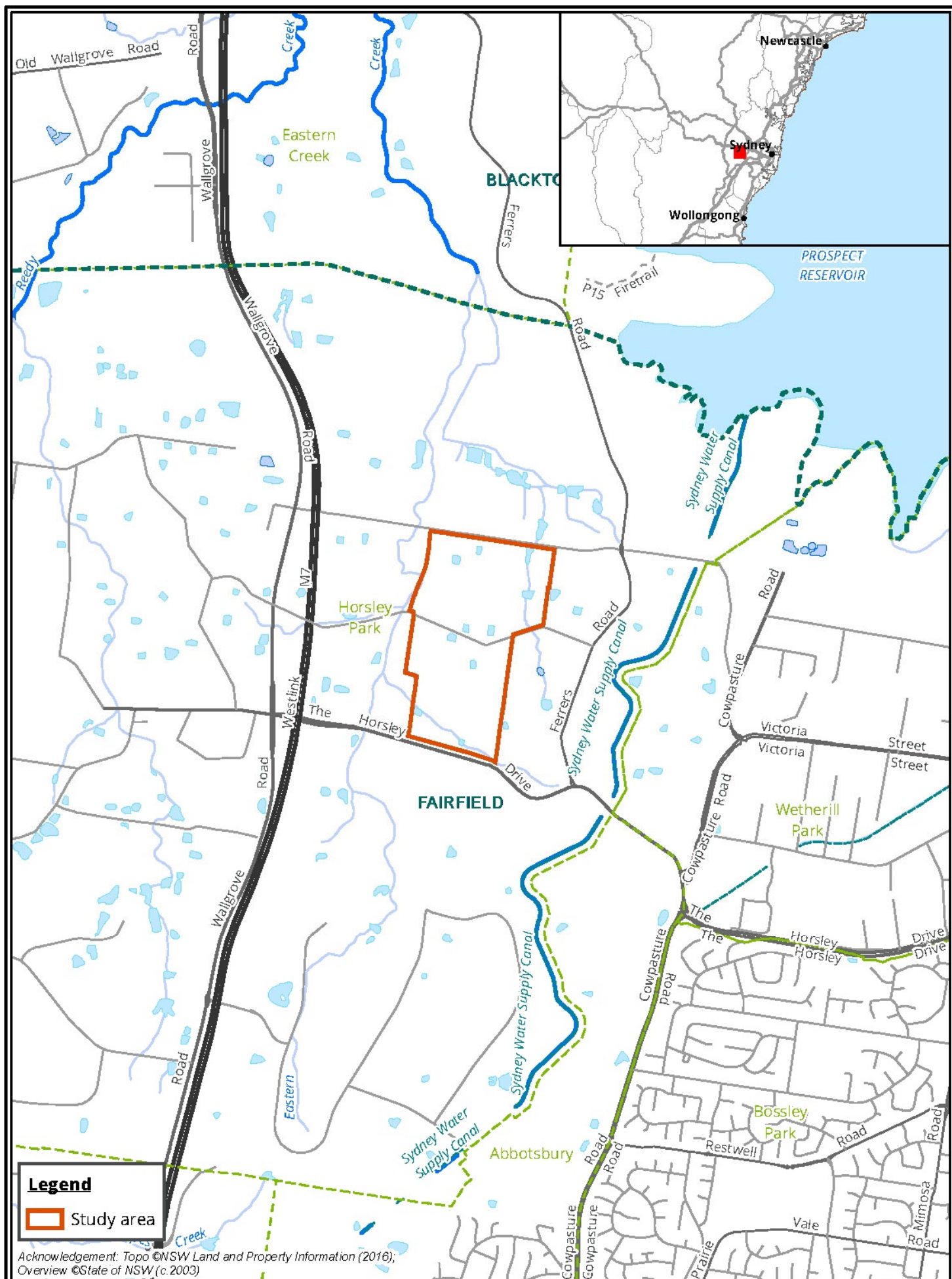
<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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





**Figure 1 Location of the study area**

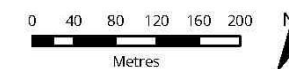




#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

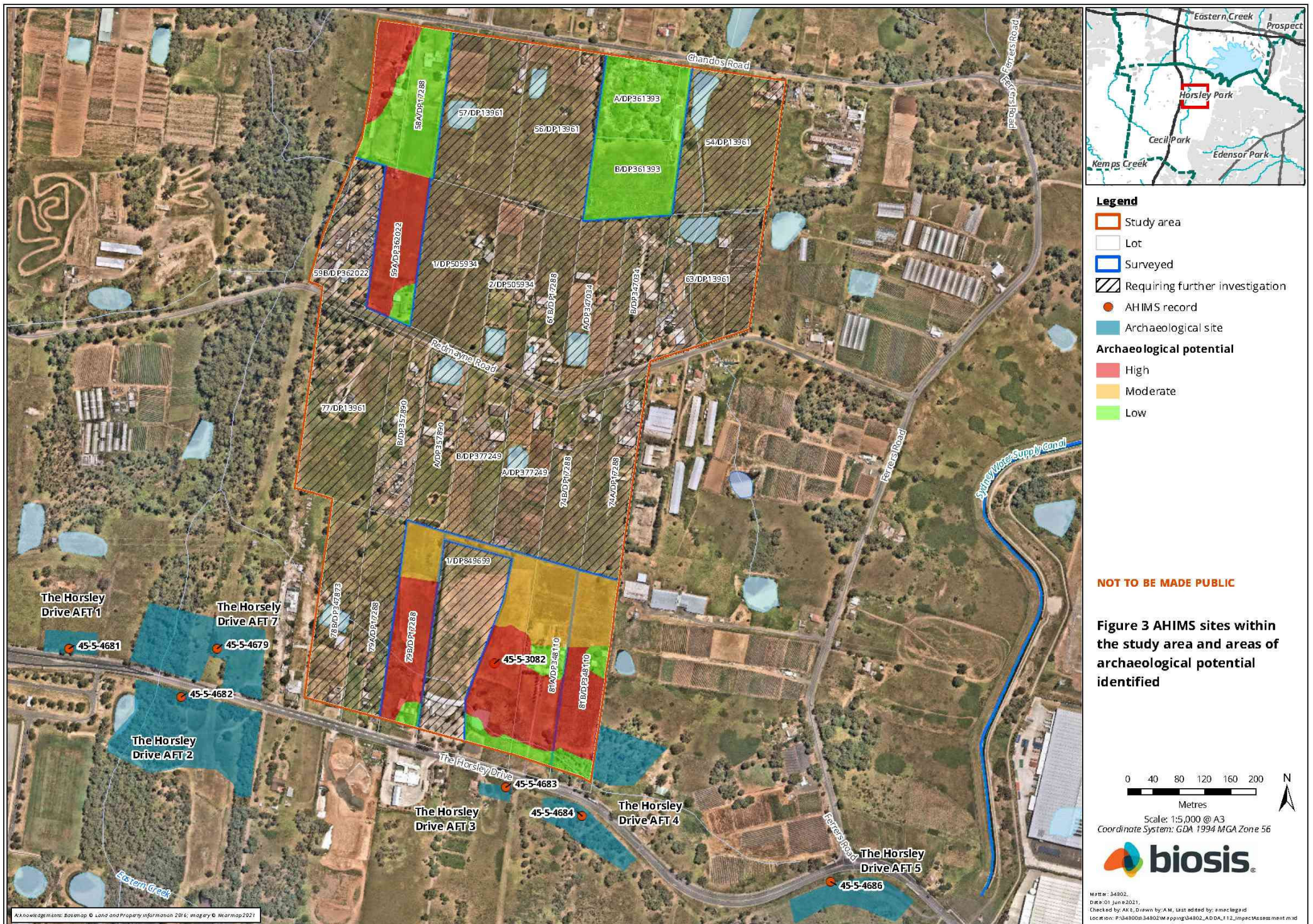


Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
Date: 28 May 2021,  
Checked by: AKE, Drawn by: LH, Last edited by: Barley  
Location: P:\34800\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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

- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

## **Culturally sensitive material**

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10 August 2021

Yurrandaali  
Bo Field  
6 Macgibbon Parade, Old Erowal Bay NSW 2540

Dear Bo ,

**RE: Stage 2 and 3 Aboriginal Community Consultation – Keyhole Lands, Horsley Park, New South Wales**

**Our Ref: Matter: 34802**

Thank you for registering your interest in the Keyhole Lands Project. Biosis Pty Ltd (Biosis) is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd (Frasers Property) to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) (the study area). The proposed rezoning will support future industrial development within the study area.

The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values.

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

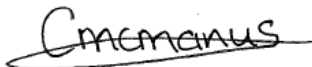
It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021** either by email, phone or return mail.

Please address feedback to:

**Maggie Butcher**  
**Unit 14, 17-27 Power Avenue, Alexandria NSW 2015**  
**Tel: (02) 9101 8700**  
**Email: [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au)**

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

Yours sincerely



Caitlin McManus  
Research Assistant

## Stage 2 – Project information

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

### The project

Frasers Property Industrial are in the process of preparing a Planning proposal that includes:

- Rezoning the study area from RU rural landscape to IN1 general industrial.
- Amend the Height of Buildings (HoB) to remove height restrictions for the study area.
- Amend the Minimal Lot Size Map to reduce the minimum subdivision lot size.

The planning proposal rezoning and amendments are to support future developments of a warehouse, and a Logistics and Industrial Facilities Hub within the study area. The planning proposal will be assessed under Part 3 of the *Environmental Planning and Assessment Act 1979*.

Biosis has been engaged by Frasers Property to undertake the ACHA to support the planning proposal and to inform the proposed designs for the study area. The ACHA will be prepared in accordance with *the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011). It includes an Archaeological Report (AR) prepared in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010b) (the Code) and consultation with Aboriginal community in accordance with the consultation requirements. The ACHA will inform Frasers Property of any potential for the project to impact on or expose Aboriginal objects or sites. Biosis will provide recommendations based on the outcomes of the ACHA.

### Study area

The study area encompasses 121-217 Chandos Rd, 143-245 Redmayne Road, and 1617-1671 The Horsley Drive, Horsley Park, NSW (See Table 1). It is within the Fairfield local government area (LGA), and is approximately 31 kilometers west of the Sydney central business district (Figure 1). The study area encompasses approximately 64 hectares of private land (Figure 2).

**Table 1 Study area – Keyhole Lands**

Lot No.	Deposited Plan	Address
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A	394855	220 Redmayne Road, Horsley Park
B	394855	222-230 Redmayne Road, Horsley Park

## Background

Biosis conducted an Aboriginal Due Diligence Assessment for the study area in March 2021. A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client Service ID: 576371) identified 103 Aboriginal archaeological sites within a 3.5 by 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082) was identified within the southern portion of the study area, and four additional Potential Archaeological Deposits (PAD) sites (AHIMS 45-5-4679, 45-5-4682, 45-5-4683, and 45-5-4684) were located within 200 metres. These sites are located within close proximity to Eastern Creek and its associated tributaries, particularly the first order drainage line located within the southern portion of the study area. The sites are predominately silcrete based artefacts scatters, with silicified tuff, quartz, and fine grained siliceous material present and are located upon hillslope/creekflat landforms within 100 metres of fresh water sources.

The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

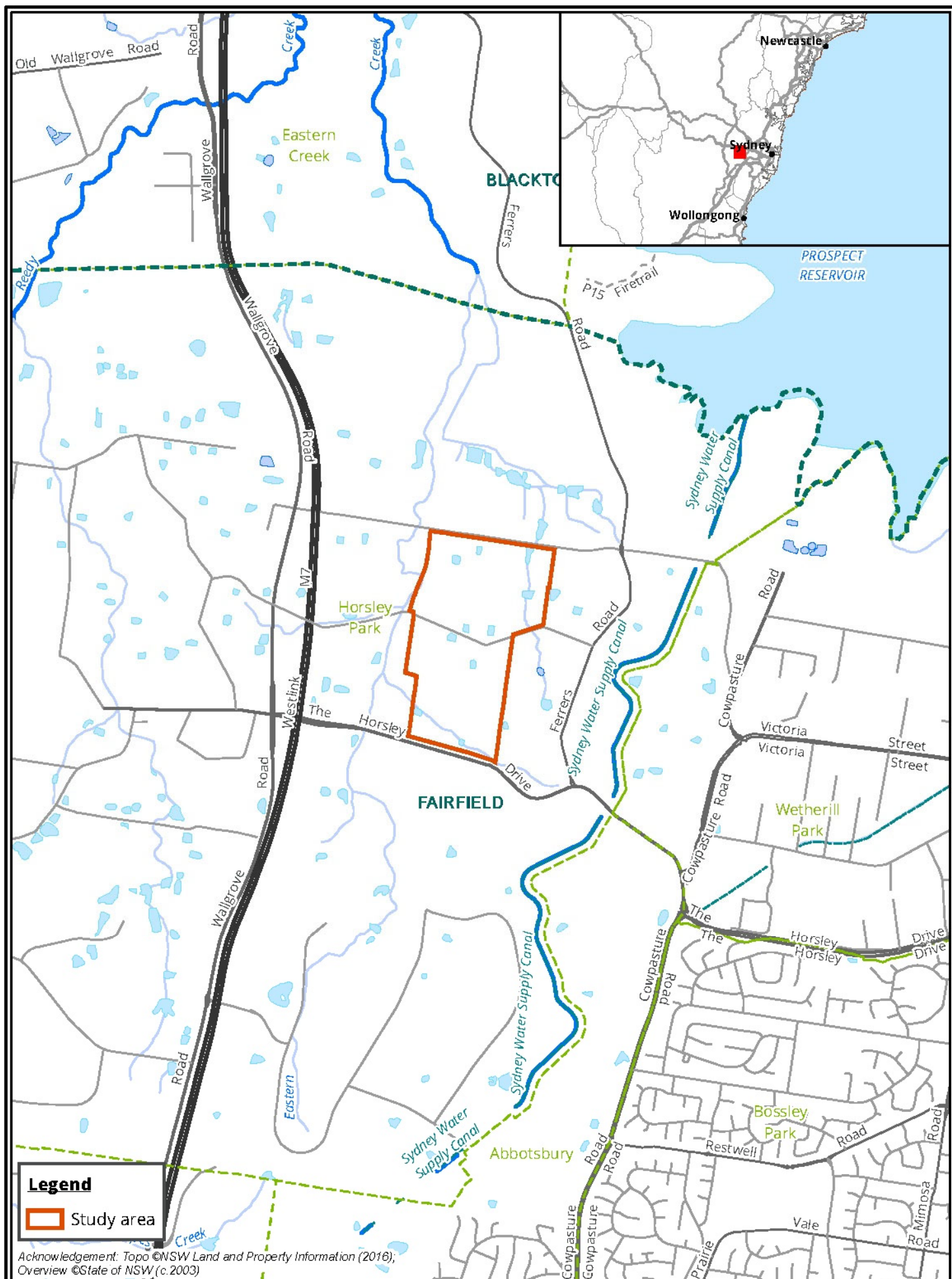


<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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



**Figure 1 Location of the study area**

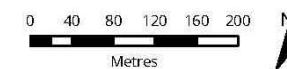




#### Legend

- Study area
- Lot

**Figure 2 Location of the study area**

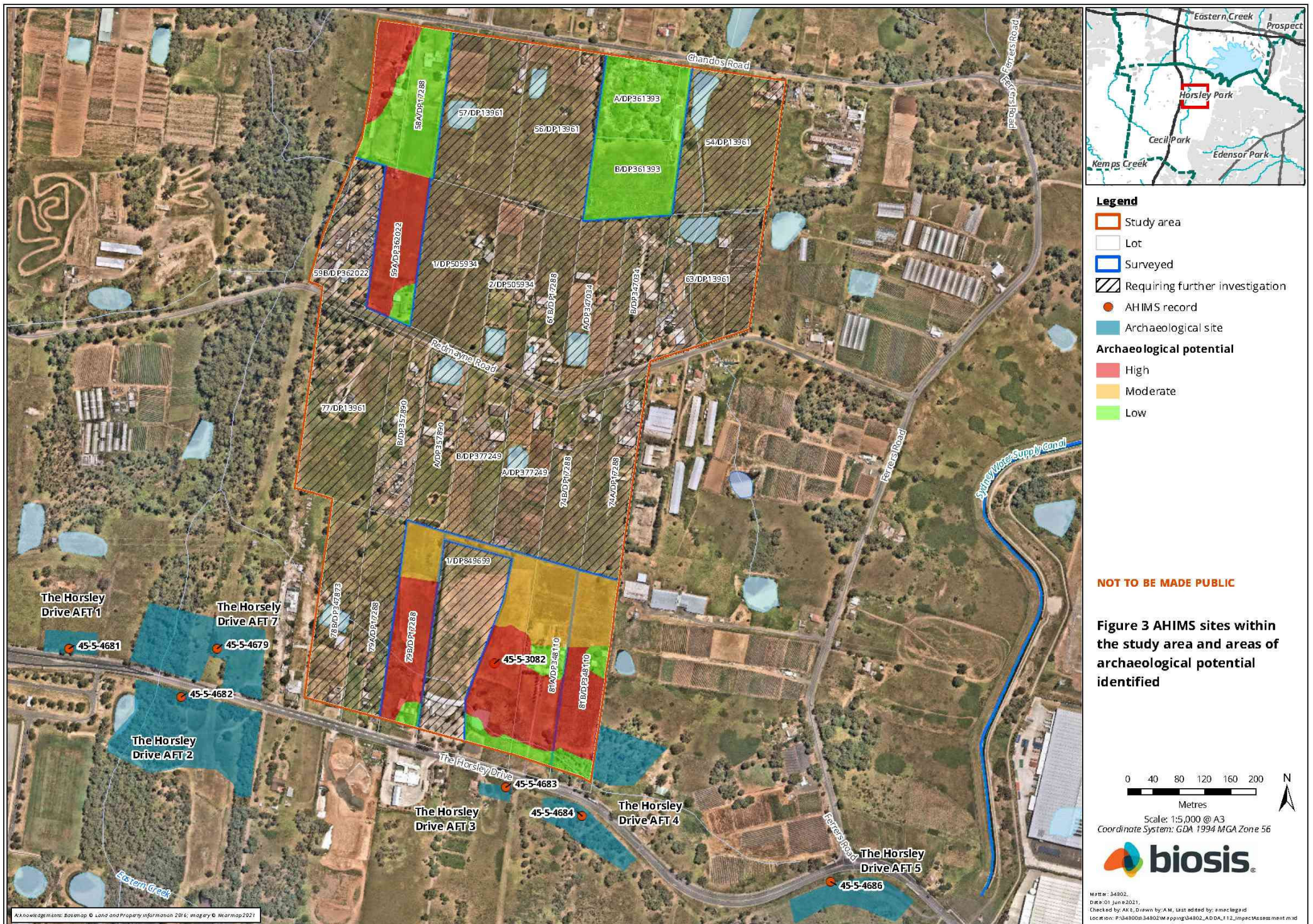


Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Matter: 34802,  
Date: 28 May 2021,  
Checked by: AKE, Drawn by: LH, Last edited by: Barley  
Location: P:\34800\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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



- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

## **Culturally sensitive material**

Biosis invites RAPs to provide culturally appropriate information via mail, email or phone with regards to this project.

Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report. If the information is regarded as too sensitive to be made public then RAPs should advise Biosis and identify the nature of the sensitivity. Biosis will then arrange for the recording of the information in accordance with its sensitivity. Documents which hold sensitive information will clearly list, on the front cover, who can have access to the document. These documents will be stored securely.

## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting GSV combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made in the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082 upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

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

Detailed results of the field investigation will be provided in the draft ACHA report and AR. Additional field investigations of the lots which were inaccessible will be undertaken as part of the ACHA process.

### **Archaeological test excavations (if required)**

Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

The aims of the testing program are to:

- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).

- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- If the depth of deposit prevents reaching sterile deposits within the 50 by 50 centimetre test pit, additional 50 by 50 centimetre test pits may be excavated adjacent to the original test pit (for example expanding the test pit to 50 by 100 centimetres) to reach the sterile deposits.
- Test pits may be combined and excavated as necessary in 50 by 50 centimetre units for the purposes of further understanding site characteristics. Note that under the Code, the maximum area that can be excavated in any one continuous area is three metres squared (3 m<sup>2</sup>).
- The Code dictates that the maximum surface area of all test excavation units must be no greater than 0.5% of the PAD or area being investigated.
- All excavated soil will be sieved in 5 millimetre sieves. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Sydney Biosis office for analysis (at Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour and texture.
  - Amount and location of cultural material within the deposit.
  - Nature of disturbance where present.
  - Stratigraphy.
  - Archaeological features (if present).
  - Photographic records.
  - Spit records.
- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- In the event that suspected human remains are identified works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present with regard to their nature and significance.

*\*Enough information is defined by Heritage NSW as meaning “the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance. This may include things like locally or regionally high object density; presence of rare or representative objects; presence of archaeological features; or locally or regionally significant deposits stratified or not.”(DECCW 2010b, p.28).*

### **Storage of cultural material**

Any cultural material identified during test excavations will be temporarily stored in the Sydney Biosis office for analysis (Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).

Once the cultural material has been analysed, the cultural material can be managed in the following manners:

- Cultural material can be held by the Aboriginal community under a care and control agreement.
- Cultural material can be returned to country and reburied as soon as practicable in a secure location in accordance with Requirements 16b and 26 of the code.

**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**

## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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

The ACHA report will contain:

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

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

As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

The final report will incorporate all comments and will be forwarded on to RAPs once completed.



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Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.

18 August 2021

Deerubbin Local Aboriginal Land Council  
Steven Randall  
PO Box 40  
Penrith NSW 2751

Dear Steven,

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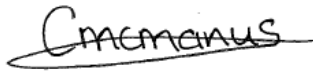
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Please do not hesitate to contact Maggie Butcher if you require additional information or have any queries about the methodology or information provided.

Yours sincerely

A handwritten signature in black ink that reads 'Cmcmenus'. The signature is written in a cursive style and is underlined with a single horizontal stroke.

Caitlin McManus  
Research Assistant

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B	394855	222-230 Redmayne Road, Horsley Park

## Background

Biosis conducted an Aboriginal Due Diligence Assessment for the study area in March 2021. A search of the Aboriginal Heritage Information Management System (AHIMS) database (Client Service ID: 576371) identified 103 Aboriginal archaeological sites within a 3.5 by 3.5 kilometre search area, centred on the study area. One registered Aboriginal site (AHIMS 45-5-3082) was identified within the southern portion of the study area, and four additional Potential Archaeological Deposits (PAD) sites (AHIMS 45-5-4679, 45-5-4682, 45-5-4683, and 45-5-4684) were located within 200 metres. These sites are located within close proximity to Eastern Creek and its associated tributaries, particularly the first order drainage line located within the southern portion of the study area. The sites are predominately silcrete based artefacts scatters, with silicified tuff, quartz, and fine grained siliceous material present and are located upon hillslope/creekflat landforms within 100 metres of fresh water sources.



The background research for the study area identified that there are two first order non perennial tributaries of Eastern Creek located within the north eastern and south western portions of the study area. Eastern Creek also transects the western portion of the study area as a second order non-perennial creekline draining to a perennial watercourse approximately 3.1 kilometres north of the study area. Landforms present within the study area include low lying, gently undulating plains and low hills. The study area is located within the Bringelly Shale geological unit which underlies the residual Blacktown soil landscape and erosional Luddenham soil landscape.

Previous archaeological assessments within the local and regional context of the study area have identified varying trends between the presence of fresh water sources and Aboriginal sites. Jo McDonald Cultural Heritage Management's 2000 study concluded that artefact density on ridgetops and upper slopes was on average lower than upon hillslopes located within proximity to first and second order tributaries, such as those found within the study area, with artefact sites found within 50 to 200 metres of water sources. It is generally agreed that artefact sites found in association with non-perennial creek lines such as first and second order creek lines are likely to consist of low density artefact scatters or isolated finds representing isolated activities or transient occupation (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007). Artefact and PAD sites are considered the most common site types within the region and have frequently been identified within proximity to fresh water sources upon gentle slope or other low lying landforms with a lack of surface artefacts considered to be irrelevant to the presence of subsurface deposits (Brayshaw McDonald Pty Ltd 1994, JMCHM 2000, DSCA 2003, Haglund and Associates 2007, KNC 2011, Richards 2014).

A field investigation was undertaken by Biosis of the study area and details regarding the investigation can be found in Stage 3 - Field investigation.

## Project schedule

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

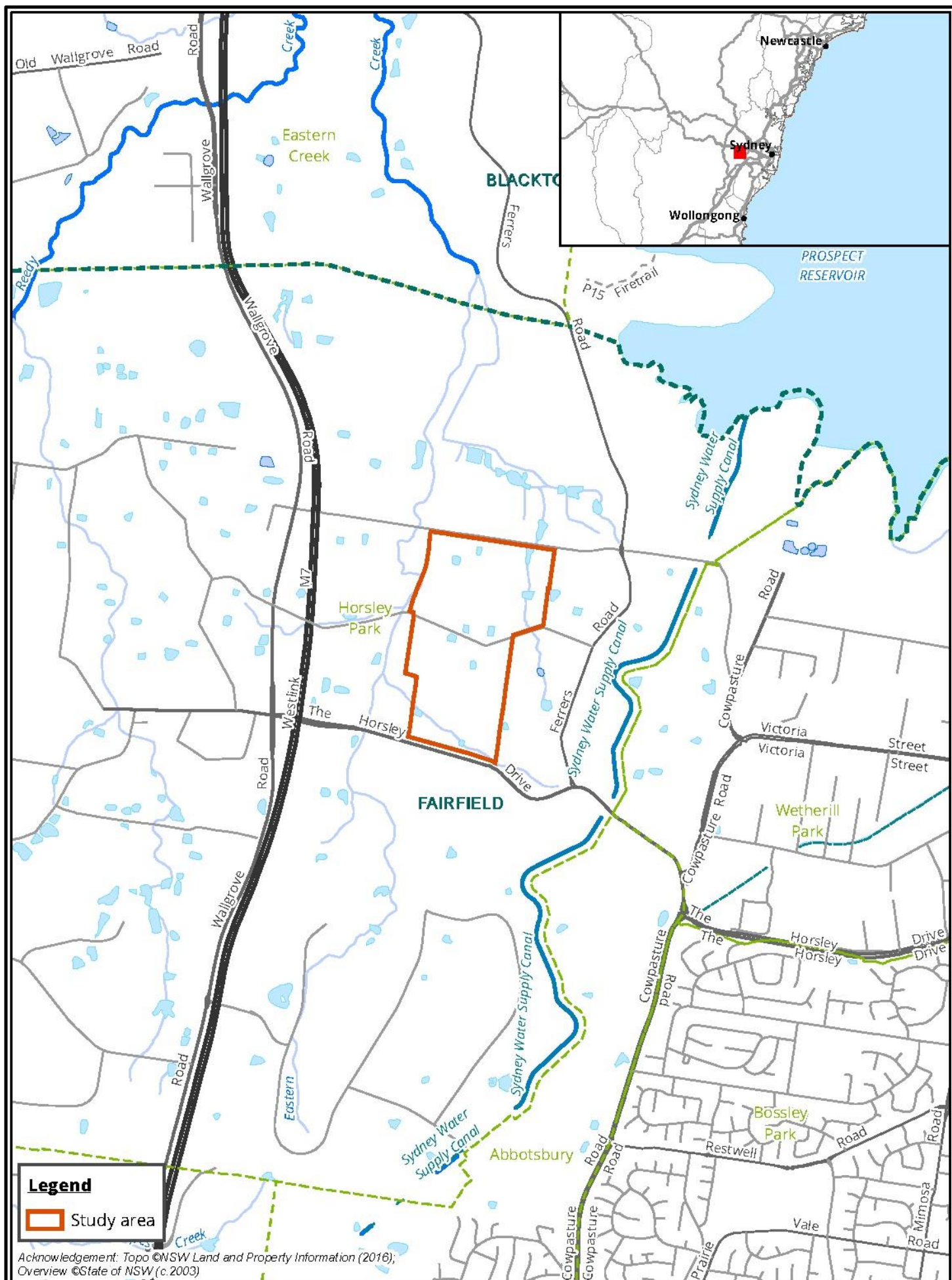
Action	Timeframe	Potential constraints and limitations
<b>Commencement of Aboriginal community consultation – advertising of project and notification to stakeholders</b>	Completed	Project advertised in the Fairfield Champion on 14 July 2021. Notices sent to identified Aboriginal parties 23 June 2021.
<b>Notices sent to identified Aboriginal parties</b>	23/06/2021	N/A
<b>Aboriginal stakeholder registration period</b>	08/07/2021 to 22/07/2021	Registration period expired on 22 July 2021
<b>Field investigation</b>	05/04/2021 TBC	Field investigation consisting of a survey of accessible lots was conducted on 5 April 2021 for the Aboriginal Due Diligence Assessment for Frasers Property. Additional field investigation TBC.
<b>Archaeological test excavations (if required)</b>	TBC	TBC

<b>Information gathering</b>	Continuous	N/A
<b>Review of draft report</b>	TBC	28 days review time allowed under the consultation guidelines.
<b>Final report</b>	TBC	TBC

## Responsibilities and roles

As part of the consultation process, RAPs are expected to respond to requests for cultural information and comment on draft reporting, as appropriate, in accordance with their role specified in section 5 of the consultation requirements. Biosis and the proponent, in accordance with their role under section 5 of the consultation requirements, will consult with the Aboriginal community by supplying suitable project information and providing the opportunity for Aboriginal stakeholders to provide input into the heritage management process.

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







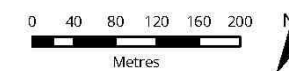
### Legend



Study area

☐ Lot

**Figure 2 Location of the study area**

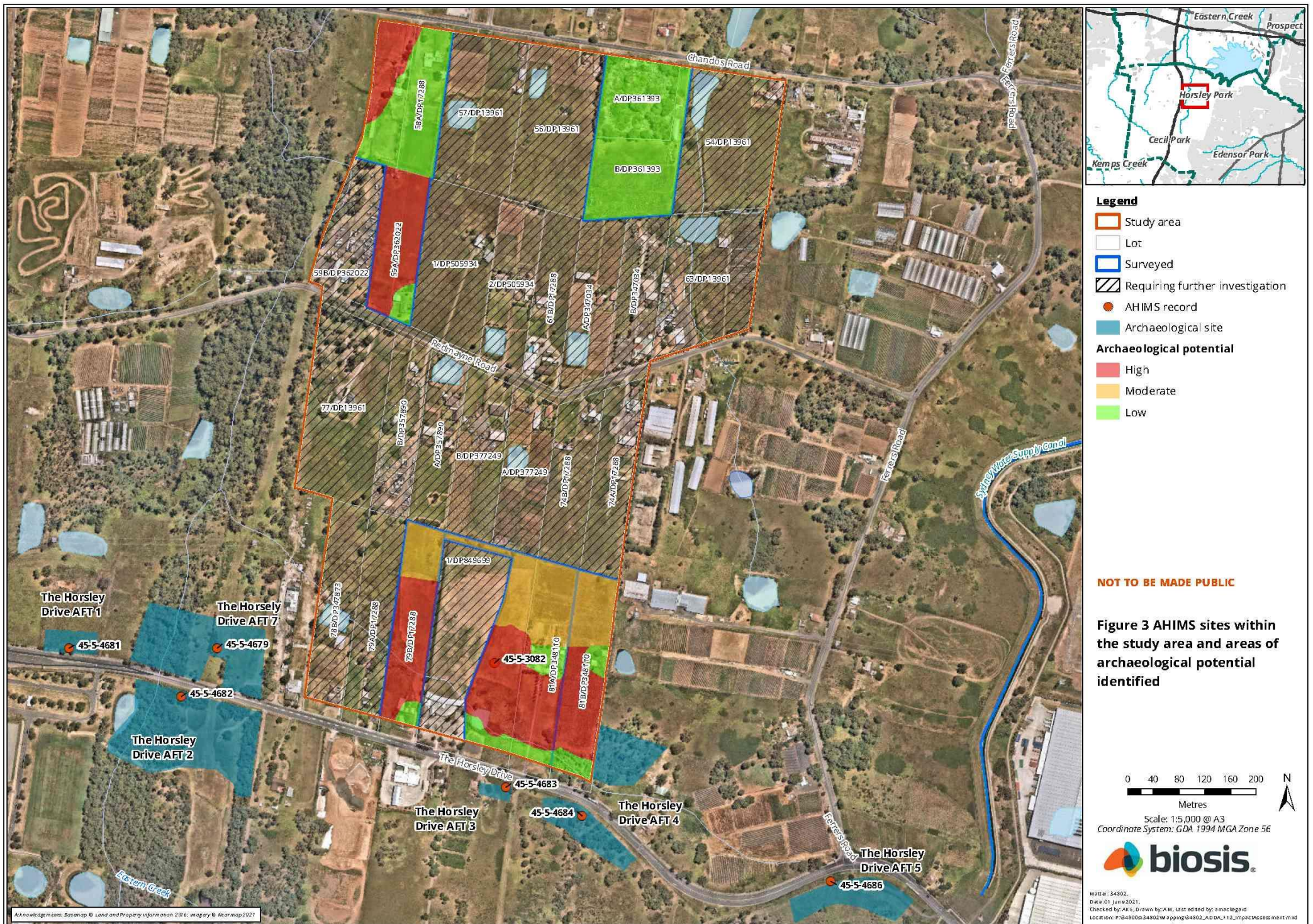


Scale: 1:5,000 @ A3  
Coordinate System: GDA 1994 MGA Zone 56



Maller: 34802  
Date: 28 May 2021  
Checked by: AKE, Drawn by: LH, Last edited by: Iharley  
Location: P:\34800\34802\Mapping\34802\_ADDA\_F2\_StudyArea.mxd







## Stage 3 – Gathering information about cultural significance

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

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

The purpose of the stage 3 document below is to provide RAPs with information about the proposed ACHA methodology for the project, including the survey strategy and test excavation (if required) methodology and to seek feedback on the Aboriginal cultural values present within the study area.

The assessment methodology includes the following tasks:

### Background research

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

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

### Consultation with the Aboriginal community

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

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

- COMPLETED. Biosis ascertained the names of Aboriginal people or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/ or places within the study area.
- COMPLETED. Aboriginal stakeholders were provided with notification by letter of the project on 8 July 2021 via Biosis on behalf of Frasers Property, and given the opportunity to be involved in consultation.
- This document outlines the details of the project and proposed archaeological testing methodology. If required. The RAPs must be given an opportunity to review and provide feedback to the proponent within a minimum of 28 days of Biosis providing the methodology document.
- The DRAFT ACHA report and AR will be provided to all RAPs for comment – the proponent must allow 28 days for comment. All comments and correspondence sent and received regarding the project will be included in the final report in an appendix.

## **Culturally sensitive material**

Biosis invites RAPs to provide culturally appropriate information via mail, email or phone with regards to this project.

Cultural information provided will be recorded in the Aboriginal consultation log and discussed in the report. If the information is regarded as too sensitive to be made public then RAPs should advise Biosis and identify the nature of the sensitivity. Biosis will then arrange for the recording of the information in accordance with its sensitivity. Documents which hold sensitive information will clearly list, on the front cover, who can have access to the document. These documents will be stored securely.

## **Field investigation**

A field investigation consisting of an archaeological survey of part of the study area was conducted on 5 April 2021. The survey concentrated on the areas of impact, and followed GSV. The survey effort targeted those portions of the study area which authorised access was obtained. Some portions of the study area such as part of Lot 81A and 81B DP 348110 were inaccessible due to chest high vegetation cover. Lot 1 DP849699 was also partially surveyed due to the recreational use of the area as an active golf driving range which made it unsafe to access.

The overall effectiveness of the survey for examining the ground for Aboriginal sites was deemed low. This was attributed to vegetation cover restricting GSV combined with a low amount of ground surface exposure. No Aboriginal sites were identified within the study area, however, areas of low, moderate and high archaeological potential were recorded based upon observations made in the field and background research. No physical cultural material was identified at the location of AHIMS 45-5-3082 upon the ground surface. However, this portion of the study area has not been significantly disturbed and still retains PAD.

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

- Aboriginal objects or sites present in the study area during the investigation.
- Survey coverage.

- Any resources that may have potentially have been exploited by Aboriginal people.
- Landforms.
- Photographs of the site indicating landform.
- Evidence of disturbance.
- Aboriginal artefacts, culturally modified trees or any other Aboriginal sites.

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

Detailed results of the field investigation will be provided in the draft ACHA report and AR. Additional field investigations of the lots which were inaccessible will be undertaken as part of the ACHA process.

### **Archaeological test excavations (if required)**

Any areas of PAD identified during the field investigation which cannot be avoided by the construction works will be subject to archaeological test excavations in line with the code as outlined below.

#### **Aims**

The principle objectives of the test excavations are to identify and understand the nature, extent and significance of any areas of PAD within the study area. This will further our knowledge of Aboriginal archaeological site patterning within the study area and enable the predictive model to be further tested and refined.

The aims of the testing program are to:

- Determine the nature and extent of the sub-surface archaeological deposits in the study area.
- Identify if the archaeological material occurs in an intact, undisturbed context, by examining the soil profile and stratigraphy.
- Analyse and interpret any archaeological finds (such as stone artefacts, hearths, etc.) recovered during the testing program.
- Inform current knowledge of Aboriginal occupation and land use models of the region.
- Provide management and mitigation measures for Aboriginal archaeological objects located during the subsurface testing program.
- Test the predictive model and answer the research questions developed as part of this assessment.

#### **Test excavation methodology**

If test excavations are required within the study area they will conform to the following methodology in line with Requirement 16 of the Code:

- Test excavations will be conducted in 50 by 50 centimetre units.
- The test pits will be excavated by hand (inclusive of trowels, spades and other hand tools) along transects at intervals of between 10 and 20 metres or other justifiable and regular spacing (being no smaller than five metres).

- The first test pit within a site or PAD area will be excavated in five centimetre spits; the subsequent test pits conducted within the site or PAD area can then be excavated in either 10 centimetre spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units being the removal of the A-horizon soil deposit down to the sterile clay or bedrock layer (B-horizon).
- If the depth of deposit prevents reaching sterile deposits within the 50 by 50 centimetre test pit, additional 50 by 50 centimetre test pits may be excavated adjacent to the original test pit (for example expanding the test pit to 50 by 100 centimetres) to reach the sterile deposits.
- Test pits may be combined and excavated as necessary in 50 by 50 centimetre units for the purposes of further understanding site characteristics. Note that under the Code, the maximum area that can be excavated in any one continuous area is three metres squared (3 m<sup>2</sup>).
- The Code dictates that the maximum surface area of all test excavation units must be no greater than 0.5% of the PAD or area being investigated.
- All excavated soil will be sieved in 5 millimetre sieves. Dry sieving will be attempted in the first instance, however wet sieving may be used if deposits cannot be dry sieved.
- All cultural material will be collected, bagged and clearly labelled. They will be temporarily stored in the Sydney Biosis office for analysis (at Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).
- For each test pit that is excavated, the following documentation will be taken:
  - Unique test pit identification number.
  - GPS coordinate of each test pit.
  - Munsell soil colour and texture.
  - Amount and location of cultural material within the deposit.
  - Nature of disturbance where present.
  - Stratigraphy.
  - Archaeological features (if present).
  - Photographic records.
  - Spit records.
- Test excavation units will be backfilled as soon as practicable.
- An AHIMS Site Impact Recording form will be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- In the event that suspected human remains are identified works will immediately cease and the NSW Police and Heritage NSW will be notified.
- Test excavations will cease when enough information\* has been recovered to adequately characterise the objects present with regard to their nature and significance.

*\*Enough information is defined by Heritage NSW as meaning "the sample of excavated material clearly and self-evidently demonstrates the deposit's nature and significance. This may include things like locally or regionally high object density; presence of rare or representative objects; presence of archaeological features; or locally or regionally significant deposits stratified or not." (DECCW 2010b, p.28).*

### **Storage of cultural material**

Any cultural material identified during test excavations will be temporarily stored in the Sydney Biosis office for analysis (Unit 14, 17-27 Power Avenue, Alexandria NSW 2015).

Once the cultural material has been analysed, the cultural material can be managed in the following manners:

- Cultural material can be held by the Aboriginal community under a care and control agreement.
- Cultural material can be returned to country and reburied as soon as practicable in a secure location in accordance with Requirements 16b and 26 of the code.

**Biosis requests any comments regarding the care and control of any cultural material be included as part of the review of this assessment methodology.**



## Reporting

Biosis will prepare an ACHA and AR for the project. The ACHA will document the findings of the assessment, and detail the consultation process. The AR will be included as an appendix to the ACHA and will document the desktop assessment, field investigation, and test excavation results.

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

The ACHA report will contain:

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

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

As part of this methodology registered Aboriginal parties will be provided with the draft report for comment and allowed **28 days** for review.

The final report will incorporate all comments and will be forwarded on to RAPs once completed.

## References

AMBS 2006, *Volume 1: Aboriginal Heritage Management Plan: West Dapto Release Area*, An unpublished report to Wollongong City Council.

Artefact Heritage 2018, *Rezoning and subdivision of 109 Darkes Road, Kembla Grange*, Report to NewQuest Property Pty Ltd.

Biosis Pty Ltd 2015, *Lot 1, DP 825516, Farmborough Heights NSW. Aboriginal Cultural Heritage Assessment for Proposed Rezoning*, Report to Plannex Environmental Planning.

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

DECCW 2010b, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment and Climate Change, Sydney NSW.

OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

Sefton, C 1980, *Aboriginal Cultural Resources Study Illawarra Region*. Illawarra Regional Planning Committee.

**From:** Lee Field <barrabyculturalservices@gmail.com>  
**Sent:** Tuesday, 3 August 2021 11:16 AM  
**To:** Caitlin McManus  
**Subject:** Re: 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation

Good Morning,

I on behalf of Barraby Cultural Services agrees with the proposed methodology for this project

Regards

Lee

On 2 Aug 2021, at 11:42 am, Caitlin McManus <[CMcManus@biosis.com.au](mailto:CMcManus@biosis.com.au)> wrote:

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

The following project information and assessment methodology (attached PDF) has been provided to provide you with information about the project, the methodology and to seek your feedback. It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by 5:00 pm 30 August 2021.

Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

**Caitlin McManus**  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)  
<[image830116.PNG](#)>  
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<34802.Keyhole.Lands.Stage.2.and.3.pdf>

**From:** lilly carroll <didgengunawalclan@yahoo.com.au>  
**Sent:** Monday, 2 August 2021 7:16 PM  
**To:** Caitlin McManus  
**Subject:** Re: 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation

Hi Caitlin

DNC is happy with the methodology for the keyhole lands project

Fully insured and experienced site officers

Kind regards

Paul Boyd & Lilly Carroll

Directors DNC

0426823944

[Sent from Yahoo Mail for iPhone](#)

On Monday, August 2, 2021, 11:43 am, Caitlin McManus <CMcManus@biosis.com.au> wrote:

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

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Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

Caitlin McManus  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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**From:** Wendy Morgan <wenlissa01@hotmail.com>  
**Sent:** Thursday, 12 August 2021 9:29 AM  
**To:** Caitlin McManus; Maggie Butcher  
**Subject:** RE: 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation

Hi Caitlin and Maggie,

As a RAP in this local Government Area I would like to thank you for informing GARI of this project and keeping us informed of the process.

GARI understands that some of the dates of the schedule would be pushed back due to the Fairfield Area been in lock-down because of the Covid-Delta pandemic.

GARI also agrees with the proposed Archaeological test excavations and methodology. We also agree with the Storage of cultural materials.

Kind regards

Wendy Morgan  
CEO GARI  
0414 964 657

Sent from [Mail](#) for Windows 10

---

**From:** [Caitlin McManus](#)  
**Sent:** Monday, 2 August 2021 11:45 AM  
**To:** '[Wenlissa01@hotmail.com](mailto:Wenlissa01@hotmail.com)'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

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Thank you,

Caitlin  
**Caitlin McManus**  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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**From:** Goobah <goobahchts@gmail.com>  
**Sent:** Wednesday, 11 August 2021 1:44 PM  
**To:** Caitlin McManus  
**Subject:** Re: 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation

This is confirmation that we support project information and assessment methodology Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales (NSW) please keep us informed on any further developments with this project:

On Mon, Aug 2, 2021 at 11:42 AM Caitlin McManus <[CMcManus@biosis.com.au](mailto:CMcManus@biosis.com.au)> wrote:

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

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Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

**Caitlin McManus**

Research Assistant - Heritage

M: 0438 537 634

D: (02) 9101 8726

E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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--

**Regards**

**Basil Smith**

**Chairperson/CEO**

**GOOBAH**

**Contact Details:**

**Address:**

**Unit 25 26-28**

**Native Way,**

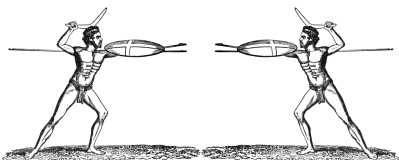
**MORUYA HEADS**

**NSW 2537**

**Mobile: 0405 995 725**

**Email: [goobahchts@gmail.com](mailto:goobahchts@gmail.com)**

**ABN: 67 517 874 760**



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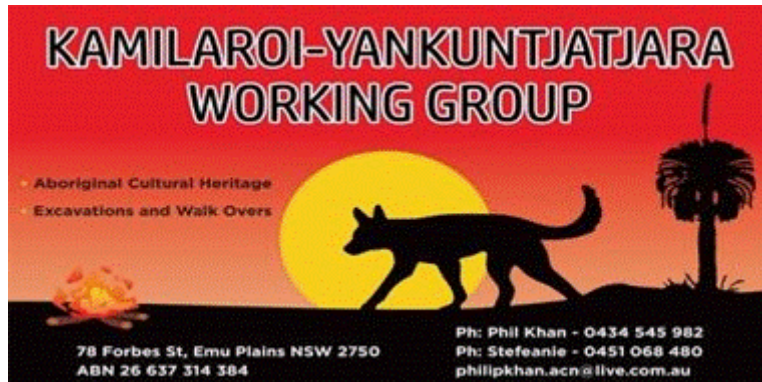
**From:** Philip khan <philipkhan.acn@live.com.au>  
**Sent:** Thursday, 12 August 2021 10:30 AM  
**To:** Caitlin McManus  
**Subject:** Re: 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation

Dear Caitlan,

Thank you for your Aboriginal community consult and methodology. Here at KYWG we hold 50 years of cultural knowledge of the area. Aboriginal people have a deep connection to the land, sky, water ways and we have cared for this land for tens of thousands of years and continue to do so. The study area is highly significant to us Aboriginal people we utilised these water ways to the full potential, and they are sacred to us. We would like to agree to your methodology, and we support your report. We look forward to Furter consultation.

Kind Regards

Kadibulla Khan



---

**From:** Caitlin McManus <CMcManus@biosis.com.au>  
**Sent:** Monday, 2 August 2021 11:42 AM  
**To:** 'philipkhan.acn@live.com.au' <philipkhan.acn@live.com.au>  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

The following project information and assessment methodology (attached PDF) has been provided to provide you with information about the project, the methodology and to seek your feedback. It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by 5:00 pm 30 August 2021.

Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin  
**Caitlin McManus**  
Research Assistant - Heritage

M: 0438 537 634

D: (02) 9101 8726

E: [cmcmamus@biosis.com.au](mailto:cmcmamus@biosis.com.au)



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**From:** Darleen Johnson <murrabidgeemullangari@yahoo.com.au>  
**Sent:** Sunday, 15 August 2021 10:37 AM  
**To:** Caitlin McManus  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 2 and 3  
**Attachments:** 34802.MBMAC.Stage.2.and.3.20210810.pdf

Dear Caitlin

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

Kind regards

Ryan Johnson

0475565517

On Tuesday, 10 August 2021, 03:13:29 pm AEST, Caitlin McManus <cmcmanus@biosis.com.au> wrote:

Hi Ryan & Darleen,

Thank you for the registration. Due to the late registration, you were missed in the initial stage 2 & 3 mail out. I have registered your group and please see attached Stage 2 and 3 documentation.

The following project information and assessment methodology (attached PDF) has been provided to provide you with information about the project, the methodology and to seek your feedback. It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by **5:00 pm 30 August 2021**.

Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin

---

**From:** Darleen Johnson <murrabidgeemullangari@yahoo.com.au>  
**Sent:** Sunday, 8 August 2021 10:15 PM  
**To:** Caitlin McManus <CMcManus@biosis.com.au>  
**Subject:** Re: 34802- Keyhole Lands Project – Stage 1 Invitation to Register

Hi Caitlin

Could you please register our corporation for the above project.

Thanks

Ryan Johnson

0475565517

On Thursday, 8 July 2021, 12:48:10 pm AEST, Caitlin McManus <[cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)> wrote:

Good afternoon,

Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Fraser Property Industrial to inform the proposed land rezoning for industrial development at Horsley Park Drive, Horsley Park NSW.

Biosis is assisting Fraser Property with consultation with the Aboriginal community to inform the ACHA.

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

If you wish to register your interest please provide your contact details in writing via post or email by 5:00 pm 22 July 2021.

If you have any queries regarding the project please don't hesitate to contact Maggie Butcher via email or phone.

Thank you

**Caitlin McManus**

Research Assistant - Heritage

M: 0438 537 634

D: (02) 9101 8726

E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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**From:** WIDESCOPE . <[widescope.group@live.com](mailto:widescope.group@live.com)>  
**Sent:** Monday, 2 August 2021 1:01 PM  
**To:** Caitlin McManus  
**Subject:** RE: 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation

Hi Caitlin,

Thank you for providing me with the Methodology Re: Keyhole Lands Project

I have reviewed and support the recommendations out lined in the Aboriginal Cultural Heritage Assessment (ACHA)

I would like to be considered for field work. Thank you I look forward to assisting the team on the project

Regards  
Steven Hickey

---

**From:** [Caitlin McManus](#)  
**Sent:** Monday, 2 August 2021 11:44 AM  
**To:** '[widescope.group@live.com](mailto:widescope.group@live.com)'  
**Subject:** 34802 - Keyhole Lands Project - Stage 2 and 3 Aboriginal Community Consultation

Good morning,

Thank you for registering your interest in the Keyhole Lands Project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial to inform the Keyhole Lands project and to support the planning proposal to Fairfield City Council. The planning proposal proposes to rezone the lots from RU2 rural landscape to IN1 general industrial at Keyhole Lands, Horsley Park Drive, Horsley Park New South Wales. The purpose of the ACHA is to determine the impacts the proposed planning proposal will have on any Aboriginal heritage values present within the study area. The ACHA will also assist Frasers Property in modifying their plans in order to minimise the impacts the works will have on Aboriginal heritage values

The following project information and assessment methodology (attached PDF) has been provided to provide you with information about the project, the methodology and to seek your feedback. It would be appreciated if you would provide feedback on the project information and methodology presented in this letter to Biosis by 5:00 pm 30 August 2021.

Please do not hesitate to contact Maggie Butcher (contact details in letter) if you require additional information or have any queries about the methodology or information provided.

Thank you,

Caitlin  
**Caitlin McManus**  
Research Assistant - Heritage  
M: 0438 537 634  
D: (02) 9101 8726  
E: [cmcmanus@biosis.com.au](mailto:cmcmanus@biosis.com.au)



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## Appendix 4 Stage 4: Review of draft cultural heritage assessment report

---

**From:** [Hannah Mills](#)  
**To:** ["Cazadirect@live.com"](mailto:Cazadirect@live.com)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:29:58 PM  
**Attachments:** [image8543f5.PNG](#)

---

Good afternoon,

Thank you for registering your interest in the Keyhole Lands project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

As part of the Stage 4 Consultation, please find the draft ACHA and AR for the project at [this hightail link](#). If you can please review the documents and provide any comments you may have to Biosis by **5:00 pm 9 December 2021**, that would be appreciated.

Please feel free to contact Maggie Butcher at [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au) with any questions you may have.

If you have any issues using the hightail link above please do not hesitate to contact me.

We look forward to hearing from you,  
Hannah

**Hannah Mills**  
Research Assistant - Heritage

M: 0487 551 375  
D: (02) 4201 1055  
E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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**From:** [Hannah Mills](#)  
**To:** ["James.eastwood@y7mail.com"](mailto:James.eastwood@y7mail.com)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:30:50 PM  
**Attachments:** [image3d468a.PNG](#)

---

Good afternoon,

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As part of the Stage 4 Consultation, please find the draft ACHA and AR for the project at [this hightail link](#). If you can please review the documents and provide any comments you may have to Biosis by **5:00 pm 9 December 2021**, that would be appreciated.

Please feel free to contact Maggie Butcher at [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au) with any questions you may have.

If you have any issues using the hightail link above please do not hesitate to contact me.

We look forward to hearing from you,  
Hannah

**Hannah Mills**  
Research Assistant - Heritage

M: 0487 551 375  
D: (02) 4201 1055  
E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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**From:** [Hannah Mills](#)  
**To:** ["barrabyculturalservices@gmail.com"](mailto:barrabyculturalservices@gmail.com)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:31:32 PM  
**Attachments:** [imagec2fc52.PNG](#)

---

Good afternoon,

Thank you for registering your interest in the Keyhole Lands project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

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Please feel free to contact Maggie Butcher at [mbutcher@biosis.com.au](mailto:mbutcher@biosis.com.au) with any questions you may have.

If you have any issues using the hightail link above please do not hesitate to contact me.

We look forward to hearing from you,  
Hannah

**Hannah Mills**  
Research Assistant - Heritage

M: 0487 551 375  
D: (02) 4201 1055  
E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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**From:** [Hannah Mills](#)  
**To:** ["butuheritage@gmail.com"](mailto:butuheritage@gmail.com)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:34:28 PM  
**Attachments:** [imaged9adb6.PNG](#)

---

Good afternoon,

Thank you for registering your interest in the Keyhole Lands project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

As part of the Stage 4 Consultation, please find the draft ACHA and AR for the project at [this hightail link](#). If you can please review the documents and provide any comments you may have to Biosis by **5:00 pm 9 December 2021**, that would be appreciated.

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We look forward to hearing from you,  
Hannah

**Hannah Mills**  
Research Assistant - Heritage

M: 0487 551 375  
D: (02) 4201 1055  
E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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**From:** [Hannah Mills](#)  
**To:** ["justinecoplin@optusnet.com.au"](mailto:justinecoplin@optusnet.com.au)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:35:13 PM  
**Attachments:** [image8bd1ff.PNG](#)

---

Good afternoon,

Thank you for registering your interest in the Keyhole Lands project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

As part of the Stage 4 Consultation, please find the draft ACHA and AR for the project at [this hightail link](#). If you can please review the documents and provide any comments you may have to Biosis by **5:00 pm 9 December 2021**, that would be appreciated.

Please feel free to contact Maggie Butcher at [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au) with any questions you may have.

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We look forward to hearing from you,  
Hannah

**Hannah Mills**  
Research Assistant - Heritage

M: 0487 551 375  
D: (02) 4201 1055  
E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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**From:** [Hannah Mills](#)  
**To:** ["didgengunawalclan@yahoo.com.au"](mailto:didgengunawalclan@yahoo.com.au)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:35:30 PM  
**Attachments:** [imageefa76b.PNG](#)

---

Good afternoon,

Thank you for registering your interest in the Keyhole Lands project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

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**Hannah Mills**  
Research Assistant - Heritage

M: 0487 551 375  
D: (02) 4201 1055  
E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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**From:** [Hannah Mills](#)  
**To:** ["goobahchts@gmail.com"](mailto:goobahchts@gmail.com)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:31:54 PM  
**Attachments:** [imagea69a9e.PNG](#)

---

Good afternoon,

Thank you for registering your interest in the Keyhole Lands project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

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We look forward to hearing from you,  
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**From:** [Hannah Mills](#)  
**To:** ["goodradigbee1@outlook.com"](mailto:goodradigbee1@outlook.com)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:32:21 PM  
**Attachments:** [image85ffc2.PNG](#)

---

Good afternoon,

Thank you for registering your interest in the Keyhole Lands project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

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Please feel free to contact Maggie Butcher at [m butcher@biosis.com.au](mailto:m butcher@biosis.com.au) with any questions you may have.

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We look forward to hearing from you,  
Hannah

**Hannah Mills**  
Research Assistant - Heritage

M: 0487 551 375  
D: (02) 4201 1055  
E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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**From:** [Hannah Mills](#)  
**To:** ["Wenlissa01@hotmail.com"](mailto:Wenlissa01@hotmail.com)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:34:10 PM  
**Attachments:** [imagefec8f4.PNG](#)

---

Good afternoon,

Thank you for registering your interest in the Keyhole Lands project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

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We look forward to hearing from you,  
Hannah

**Hannah Mills**  
Research Assistant - Heritage

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D: (02) 4201 1055  
E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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**From:** [Hannah Mills](#)  
**To:** ["philipkhan.acn@live.com.au"](mailto:philipkhan.acn@live.com.au)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:32:41 PM  
**Attachments:** [image3052ca.PNG](#)

---

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We look forward to hearing from you,  
Hannah

**Hannah Mills**  
Research Assistant - Heritage

M: 0487 551 375  
D: (02) 4201 1055  
E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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**From:** [Hannah Mills](#)  
**To:** ["murrabidgeemullangari@yahoo.com.au"](mailto:murrabidgeemullangari@yahoo.com.au)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:36:18 PM  
**Attachments:** [image01c3d9.PNG](#)

---

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**From:** [Hannah Mills](#)  
**To:** ["scott@tocomwall.com.au"](mailto:scott@tocomwall.com.au)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:33:29 PM  
**Attachments:** [image08b869.PNG](#)

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**From:** [Hannah Mills](#)  
**To:** ["Waawaar.awaa@gmail.com"](mailto:Waawaar.awaa@gmail.com)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:33:53 PM  
**Attachments:** [image0e5600.PNG](#)

---

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**From:** [Hannah Mills](#)  
**To:** ["widescope.group@live.com"](mailto:widescope.group@live.com)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:36:00 PM  
**Attachments:** [imagef685b1.PNG](#)

---

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**From:** [Hannah Mills](#)  
**To:** ["yurrandaali\\_cs@hotmail.com"](mailto:yurrandaali_cs@hotmail.com)  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation  
**Date:** Thursday, 11 November 2021 3:36:39 PM  
**Attachments:** [image96b85e.PNG](#)

---

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Hannah

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Research Assistant - Heritage

M: 0487 551 375

D: (02) 4201 1055

E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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**From:** [Maggie Butcher](#)  
**To:** [Caitlin McManus](#); [Crystal Garabedian](#); [Hannah Mills](#)  
**Subject:** FW: Aboriginal Cultural Heritage Assessment (ACHA)  
**Date:** Friday, 12 November 2021 11:24:18 AM  
**Attachments:** [imageff4425.PNG](#)

---

Could someone please add this to 34802 consultation?

**From:** Goobah <goobahchts@gmail.com>  
**Sent:** Friday, 12 November 2021 11:19 AM  
**To:** Maggie Butcher <MButcher@biosis.com.au>  
**Subject:** Aboriginal Cultural Heritage Assessment (ACHA)

This is confirmation that we support the draft Keyhole Lands project Aboriginal Cultural Heritage Assessment (ACHA) Horsley Park Drive, Horsley Park New South Wales and wish to be kept informed on any further developments.

--

**Regards**

**Basil Smith**  
**Chairperson/CEO**  
**GOOBAH**

**Contact Details:**

**Address:**  
**Unit 25 26-28**  
**Native Way,**  
**MORUYA HEADS**  
**NSW 2537**

**Mobile: 0405 995 725**

**Email: [goobahchts@gmail.com](mailto:goobahchts@gmail.com)**

**ABN: 67 517 874 760**



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**Maggie Butcher**  
Consultant Archaeologist

M: 0428 542 268

D: (02) 9101 8707

E: [mbutcher@biosis.com.au](mailto:mbutcher@biosis.com.au)



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## Hannah Mills

---

**From:** Philip khan <philipkhan.acn@live.com.au>  
**Sent:** Monday, 29 November 2021 5:44 PM  
**To:** Hannah Mills  
**Subject:** Re: 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation

Dear Hannah,

Thank you for your ACHA for 34802 Keyhole Lands. Aboriginal people have managed the land and cared for it for tens of thousands of years and continue to do so. We have a deep connection with the land, water and sky this connection guides us when walking the land, we are one with mother nature. There are tangible, intangible, and aesthetic aspects that our culture depends on, we must take these into account when doing an assessment of the land. By acknowledging stories and creation stories of the land we work on today and continuing the connection to country through interpretation and passing on this knowledge. We follow the water ways as a giver of life without them we are not here; over the last two hundred years we have lost many water ways due to the arrival of Europeans who have destroyed such water ways due to miss managed land causing catastrophic damage to ecosystems. Major waterways within the area are Ready Creek, Eastern Creek, and Ropes Creek that created a wet land that supply rich resources such as food and medicine.

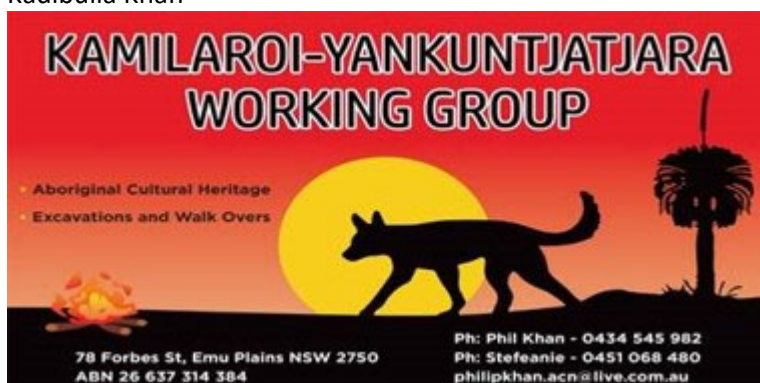
We must also consider practices that have taken place by Aboriginal people to care for country, fire management being a well-known tool of Aboriginal people to manage the landscape, creating ecosystems that today we may not see due to climate change and miss management by the Europeans. Aboriginal people have the knowledge of the land and how ecosystems work they recognised this and created landscapes that suited them and provide resource rich environments. We must also consider burials within the area as Aboriginal people were majorly affected by colonisation and suffered from disposition of their land making it hard to be aware of where their burials are today.

Our modern history that we must consider the last two hundred years has affected Aboriginal people dramatically and we are thriving considering the disposition and effects of colonization. Aboriginal cultural groups come from all over NSW, as Aboriginal people were moved due to the stolen generation, this suggest that there are many cultural groups in this area. Today Aboriginal people come from all over Sydney not just one cultural group and we continue to thrive and excel moving forward.

We would like to recommend a cultural interpretation plan for this project to educate the wider community and continuing the passing down of knowledge to our younger generations. This can be achieved through native landscaping, edible gardens, art, digital displays, sound scape, water features, with in your design and much more. We would like to agree to your recommendation, and we support your ACHA, we look forward to working alongside you on this project.

Kind Regards

Kadibulla Khan





---

**From:** Hannah Mills <HMills@biosis.com.au>  
**Sent:** Thursday, 11 November 2021 3:32 PM  
**To:** 'philipkhan.acn@live.com.au' <philipkhan.acn@live.com.au>  
**Subject:** 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation

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We look forward to hearing from you,  
Hannah

**Hannah Mills**

Research Assistant - Heritage

M: 0487 551 375

D: (02) 4201 1055

E: [hmills@biosis.com.au](mailto:hmills@biosis.com.au)



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## Hannah Mills

---

**From:** Darleen Johnson <murrabidgeemullangari@yahoo.com.au>  
**Sent:** Wednesday, 17 November 2021 11:17 AM  
**To:** Hannah Mills  
**Subject:** Re: 34802 Keyhole Lands ACHA and AR: Stage 4 Consultation

Hi Hannah

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

Kind regards  
Ryan Johnson  
0475565517

On Thursday, 11 November 2021, 03:36:22 pm AEDT, Hannah Mills <hmills@biosis.com.au> wrote:

Good afternoon,

Thank you for registering your interest in the Keyhole Lands project. Biosis is currently undertaking an Aboriginal Cultural Heritage Assessment (ACHA) for Frasers Property Industrial Pty Ltd to inform the proposed land rezoning for an industrial development at Horsley Park Drive, Horsley Park New South Wales.

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## Appendix 5 Archaeological Report

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