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Re: Amended REF—Aboriginal and Historic Heritage Constraints and Recommendations

Lendlease Communities (Figtree Hill) Pty Ltd (Lendlease) has engaged GML Heritage Pty Ltd (GML) to undertake Aboriginal and historical heritage assessment and management for the following amended changes, required by Transport for NSW, to the Appin Road design. The Amended Review of Environmental Factors (REF) boundary includes:

- Fauna Underpass Impacts (additional), comprising realignment of the Koala underpass at Glen Lorne to make it perpendicular to Appin Road;
- an additional area for HV connection; and
- the Material Compound and Storage Location (additional).

The proposed works, as well as the previously assessed Fauna Underpass Impacts, are presented in Figure 1.

Aboriginal Heritage Constraints

GML has previously prepared Aboriginal heritage documentation for Mount Gilead Stage 1, which led to the issuing of Aboriginal Heritage Impact Permit (AHIP) C0005248. This AHIP covers the area of impact of the Material Compound and Storage Location (additional), and portions of the Fauna Underpass Impacts (additional). All proposed works within these areas must be conducted in accordance with the conditions of the AHIP. No further Aboriginal heritage assessment is required.

For the Mount Gilead Stage 2 area, GML is undertaking a range of works as part of the Mount Gilead Stage 2, Aboriginal Cultural Heritage Assessment Report (ACHAR). As part of these investigations, we prepared the Mount Gilead Stage 2, Appin Road

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Koala Crossing Archaeological Research Design (ARD); this work assessed the potential for subsurface Aboriginal objects within the Fauna Underpass Impact area.

The Browns Bush and Glen Lorne investigation areas have been inspected as part of prior archaeological inspections of Mount Gilead Stage 2. These survey works are detailed in the Mount Gilead Stage 2 ACHAR. A total of nine separate inspections/surveys/site visit events have been undertaken with different Aboriginal groups/individuals and GML staff. The Browns Bush and Glen Lorne areas were investigated as part of inspections conducted on 29 September 2020, 20 October 2020, and 13 November 2020 led by GML archaeologist Dr Tim Owen. The relevant focus of each of these surveys was as follows:

- 29 September 2020—inspection of conservation lands east of Appin Road;
- 20 October 2020—Glen Lorne area;
- 13 November 2020—historical archaeological survey in locations of historical archaeological potential.

Based on the methodology and research design presented in the ARD, we carried out a program of Aboriginal archaeological test excavations within the Fauna Underpass Impact area at two locations, designated 'Glen Lorne' and 'Browns Bush'.

The findings of these investigations are presented in the Mount Gilead Stage 2, Appin Road Koala Crossing Archaeological Technical Report (ATR). This ATR is included as an appendix to the ACHAR.

The Browns Bush testing area covered the proposed southern koala crossing area. Archaeological test excavation included a total of 12 test units. It was confirmed that the shallow remnant A1/A2 horizons in this area do not retain Aboriginal objects. The Browns Bush area was assessed to hold low to nil potential for any further subsurface Aboriginal objects. Based on these findings, the Fauna Underpass Impacts were assessed as having a low likelihood to impact Aboriginal objects and works could proceed subject to caution. These findings are relevant because they further confirm the Aboriginal archaeological potential on this landform.

The Glen Lorne testing area covered the Fauna Underpass Impacts and a 20m buffer. This buffer includes portions of the Fauna Underpass Impacts (additional). In the Glen Lorne archaeological test excavation area, 22 test units were placed. One Aboriginal object was recovered from a displaced soil context during the excavation—this was in the southwestern corner of the study area. The AHIP C0005248 was varied by Heritage NSW to allow return to Country of this object to a Stage 1 conservation zone.

The ATR assessed the Glen Lorne testing area to hold low to nil potential for any further subsurface Aboriginal objects within an intact soil context. Based on these findings, the Fauna Underpass Impacts were assessed as having a low likelihood to impact Aboriginal objects.

The works proposed as part of the Fauna Underpass Impacts (additional) extend the area of impact to the northwest of that area assessed under the ATR. The proposed impacts will occur within the same landform, and in immediate proximity to the testing area (Figure 2). The assessment of the ATR can be applied to Fauna Underpass Impacts (additional) without the need for further archaeological excavations.

The works proposed as part of the HV connection occur on a similar landform to the Koala Crossing Glen Lorne testing area; however, the HV connection is located 285m to the south. Given the distance from the Glen Lorne testing area, the ATR findings cannot be applied to the HV connection impact area (Figure 2). The impacts from the works must be investigated following the same methodology presented in the ARD. The findings of these investigations must be presented in an additional ATR to be included as an appendix to the ACHAR.

AHIMS Search

Redacted for Public Exhibition

Historical Heritage Constraints

The proposed works as part of Fauna Underpass Impacts (additional), and the additional area for HV connection are in the vicinity of Glen Lorne, identified in the Campbelltown Local Environmental Plan 2015 (CLEP) as an item of local significance (Item No. I55) (Figure 2). The proposed amendments to the Appin Road design do not impact on this or any other identified heritage item.

Previous historical archaeological assessment of Glen Lorne (Mount Gilead Stage 2, Historical Archaeological Assessment, GML, October 2021) identified an overall high potential for remains associated with the original homestead. The archaeological potential at Glen Lorne is summarised in the following table.

Table 1 Summary of the archaeological potential at Glen Lorne.

Possible Archaeological Remains	Potential
Tree boles (burnt or stumped) associated with land clearing.	Low
Ephemeral evidence associated with garden beds, including pollen and seeds to identify planting types. Yard surfaces and garden paths.	Moderate

Possible Archaeological Remains	Potential
<p>Landscape evidence including modifications for agricultural and water management purposes.</p> <p>Pits cut and filled with rubbish as a form of expedient disposal.</p> <p>Sealed artefact deposits contained within structural features such as cesspits, wells, drains, cisterns, etc.</p> <p>Isolated artefacts or surface scatters.</p> <p>Potential remains of a homestead structure and associated outbuildings might include postholes, wall footings/foundations, paths, yard surfaces and floor surfaces.</p> <p>Water management structures, including wells and cisterns.</p> <p>Evidence of fencing, including fenceposts and gate.</p> <p>Evidence of a driveway to the site.</p> <p>Cultural plantings around the homestead site.</p>	<p>High</p>

Glen Lorne is subject to ongoing historical archaeological research. The Glen Lorne Archaeology Project is a joint venture between Lendlease, GML and the University of Sydney Archaeology Department. We have developed thematic research frameworks, an archaeological research design, and have ongoing research (including an honours project in 2023) which focuses on Glen Lorne. It is proposed that initial archaeological work will focus on excavation around the site, with trenches placed to investigate the eastern side of the Glen Lorne house, the site of the cold store, and the site of the former carriage loop, adjacent to the main entrance drive (Figure 4).

No archaeological testing is proposed within the area of the proposed realignment of the Glen Lorne Fauna Underpass, or the additional area for HV connection. However, we note the Aboriginal archaeological test excavations undertaken at the Glen Lorne Fauna Underpass site (described above) did not identify any historical archaeological remains or relics.

There is some potential for archaeological remains associated with the former Glen Lorne estate within the proposed additional area for HV connection. Potential remains are likely to be limited to fencing (postholes) and evidence of agricultural remains. As such, any subsurface excavations in this area should be subject to a program Unexpected Heritage Find Procedure (UHFP).

Previous historical archaeological assessment of Mount Gilead (*Mount Gilead, Appin Road, Gilead Campbelltown, European Heritage Assessment*, Tropman and Tropman Architects/Navin Officer, June 2014) identified the potential for remains of the former estate carriageway within the approximate location of the proposed Material Compound and Storage Location (Figure 5). This section of the former carriageway is now covered in bitumen and gravel. It was recommended that the historic alignment of the carriageway should be retained in some form. Photographs of the carriageway from the c1880s show

a rail and post fence and tree plantings along the length of the carriageway. It was described as a 'drained, well-formed and well-kept' roadway.

There is some potential for archaeological remains associated with the former Mount Gilead carriageway within the proposed Material Compound and Storage Location. As such, any subsurface excavations in this area should be subject to an archaeological monitoring program. The proposed historical archaeological monitoring qualifies for a self-assessed Excavation permit Exception s139(4) under clause 2(e),

(e) Any disturbance or excavation of land for archaeological monitoring of relics of local heritage significance completed in accordance with the guideline 'Relics of local heritage significance: a guide for archaeological test excavation' published by Heritage NSW.

This exception **does not** apply to relics of state heritage significance.

Aboriginal Heritage Conclusions and Recommendations

The Fauna Underpass Impacts (additional) works within the boundary of AHIP C0005248 must be conducted in accordance with the conditions of the AHIP. No further Aboriginal archaeological assessment is required.

As stated in the ATR, archaeological investigation has confirmed there is low to nil potential for any further subsurface Aboriginal objects within the Glen Lorne study area. Given the proximity to the Glen Lorne study area, these findings can be applied to the Fauna Underpass Impacts (additional) without the need for further assessment.

The ATR recommended that the Fauna Underpass Impacts could proceed subject to caution within both Glen Lorne and Browns Bush. The ATR advised that if during the process of works Aboriginal sites and/or objects are suspected and/or identified, an Aboriginal unexpected finds protocol should be enacted. The Fauna Underpass Impacts (additional) that occur within, or in immediate proximity to, the Glen Lorne study area must follow the same recommendations.

The HV connection works require additional Aboriginal archaeological investigations to assess if the works will impact Aboriginal objects or cultural heritage values. The impacts from the works must be investigated following the methodology presented in the ARD.

The Material Compound and Storage Location (additional) works occur within the boundary of AHIP C0005248 and must be conducted in accordance with the conditions of the AHIP. No further Aboriginal archaeological assessment is required.

Historic Heritage Conclusions and Recommendations

Previous archaeological testing within the vicinity of the Fauna Underpass Impacts (additional) suggests there is limited potential for historical archaeological remains in this area. No further historical archaeological assessment in this area is required.

There is potential for archaeological remains associated with the former Glen Lorne estate within the proposed additional area for HV connection. Potential remains are likely to be limited to fencing (postholes) and evidence of agricultural remains. All subsurface excavations in this area should be subject to a UHFP.

There is potential for archaeological remains associated with the former Mount Gilead carriageway within the proposed Material Compound and Storage Location. Any subsurface excavations in this area should be subject to an archaeological monitoring program. Archaeological monitoring of locally significant historical archaeology qualifies for a self-assessed excavation permit exception s139(4) under clause 2(e). This exception **does not** apply to relics of state heritage significance.

If relics are found during the course of the historical archaeological program, a notification of the relic—via email—under Section 146 of the *Heritage Act 1977 (NSW)* (the Heritage Act) is required (see attached works method statement). Depending on the nature of the discovery, additional assessment and approval may be required prior to the recommencement of excavation in the affected area(s). If the archaeological program identifies that further archaeological work is required, for example salvage excavation, then a section 140 excavation permit may be necessary.

Heritage Inductions

Prior to the commencement of ground impacts, a heritage induction should be provided to all contractors to ensure that they are aware of the requirements under the project approval, and the procedure for advising the nominated archaeologist of unexpected finds. All project personnel should attend a general project induction prior to commencing work on the project. We have previously prepared an induction package for Lendlease, which is suitable for delivery on this project.

I trust this letter outlines the assessed heritage status of the project areas, and establishes the need for future inductions, assessment and management.

Yours sincerely,



Declan Coman

Heritage Consultant

GML Heritage Pty Ltd



Figure 1 The proposed works in relation to Mount Gilead Stage 1/AHIP C0005248 (orange outline) and Mount Gilead Stage 2 (red outline). (Source: Lendlease, NSW LPI Imagery with GML overlay)



Figure 2 The proposed Fauna Underpass Impacts (additional) and additional area of HV connection in relation to the Glen Lorne CLEP item (I55) and Aboriginal archaeological test excavation units. (Source: Lendlease, NSW LPI Imagery with GML overlay)



Figure 3 Proposed Material Compound and Storage Location (additional) works. (Source: Lendlease, NSW LPI Imagery with GML overlay)



Figure 4 Proposed locations for future Glen Lorne research project historical archaeological testing, at the Glen Lorne site overlaid onto the 1943 aerial. (Source: SIX Maps with GML overlay)



Figure 5 The former Mount Gilead estate carriageway (orange line) is within the approximate location of the proposed Material Compound and Storage Location (red square). (Source: Tropman and Tropman Architects/Navin Officer 2014, Figure 14)

Works Method Statement—historical archaeology

Overview

The following works method statement (WMS) identifies the program of archaeological investigations that has been developed to manage and mitigate impacts of the proposed works on significant historical (non-Aboriginal) archaeological remains (relics).

Heritage induction

Prior to the commencement of ground impacts a heritage induction should be presented to all on-site project personnel, including contractors, to ensure they are aware of the requirements under the project approval and the procedure for advising the nominated archaeologist of unexpected finds. All project personnel should attend a general project induction prior to commencing work on the project. We have previously prepared an induction package for Lendlease, which is suitable for delivery on this project.

Archaeological monitoring

To mitigate any impacts of the proposed works on archaeological remains associated with the former Mount Gilead carriageway, subsurface works within the proposed Material Compound and Storage Location should be subject to a program of archaeological monitoring.

Archaeological monitoring refers to the supervision by an archaeologist of ground disturbance or excavation works undertaken by mechanical excavator or constructional personnel. The objective of monitoring is to ensure that archaeological layers, features, and deposits are identified and not impacted prior to detailed excavation in accordance with this document.

Archaeological monitoring requires a suitably qualified archaeologist to attend site for the duration of the excavations.

Monitoring Methodology

- An approved archaeologist will be required on site at the commencement of works where monitoring is necessary.
- The archaeologist will work with the mechanical excavator—fitted with a mud bucket—during removal of modern surfaces and fill in areas with the potential for significant historical archaeological remains to ensure that they are not impacted.
- If archaeology is identified, works will cease in the affected location to allow for further archaeological inspection.
- Targeted manual excavation will be undertaken by qualified archaeologists if/when potential features or artefact deposits are encountered by the mechanical excavator. Manual excavation will be undertaken with trowels, shovels, hoes, picks, brushes and coal shovels.

- Archaeological finds, including artefacts will be managed in accordance with the methodologies presented in this WMS:
 - Investigation and recording will be undertaken where archaeology is encountered during monitoring.
 - Any artefacts will be collected in accordance with the artefact collection strategy set out below.
 - Should the archaeological monitoring identify substantially intact archaeological remains of the former Mount Gilead carriageway, options for the in situ preservation should be considered in consultation with Heritage NSW.
- State significant archaeology **will not** be removed during the monitoring program. Small sondages and localised areas may be hand excavated to confirm the nature of the archaeology, determine if there are multiple phases and clarify significance.

Unexpected Heritage Finds Procedure (UHFP)

An Unexpected Heritage Finds Procedure (UHFP) should be implemented for all other proposed subsurface excavations—within the vicinity of the Fauna Underpass Impacts (additional) and the proposed additional area for HV connection. There is an anticipated nil-low impact on historical archaeological remains (relics) in these locations.

The following procedure would apply for unexpected archaeological finds:

- Cease activity in the affected area and secure/protect the suspected archaeological find from impact.
- Contact the nominated archaeologist to assess and inspect the suspected archaeological find.
- Historical archaeological finds will be managed in accordance with this WMS and requirements of the Heritage Act.
- Work in the affected area can recommence once the archaeological work is complete and the consent conditions and/or permit requirements have been met.

If any unexpected historical archaeological relics (not identified in this report) were uncovered during the course of the work, then all works shall cease immediately in that area and Heritage NSW shall be contacted. Depending on the level of significance of the relics, further management, including possible retention and/or interpretation of the relics, may be required before further works can continue in that area.

Recording

The recording of archaeological data would be based on the single context recording system. Phasing and interpretation of the archaeological features in relation to the entire site would also be included in the record sheets and survey. The recording process for the archaeological testing program would be as follows:

- Trench locations, excavation methodology and main findings would be recorded and surveyed.
- Archaeological structural remains, deposits and features would be recorded on context sheets.
- A digital (JPEG files) photographic record of the archaeological program would be made. Significant archaeological remains would be recorded using both JPEG and RAW files. All photographs would include a scale.
- Scale drawings would be prepared and include location of the archaeological remains within the overall site. A surveyor would take geo-referenced survey data to prepare survey drawings.
- Artefacts from excavated non-significant deposits, such as topsoil and fill layers, would be collected for analysis as set out below.
- Building material samples may be collected for further analysis and inform the archaeological assessment.
- Registers of contexts, photos, samples, and drawings would be kept, digitised and collated for the site archives.

Artefacts

The artefact policy for the monitoring program is as follows:

- Non-diagnostic material from non-significant layers and disturbed fills would be recorded on the context sheet and photographed as appropriate. They would then be reburied within the test trench. Examples of such material include:
 - tiny body sherds of ceramic and glass vessels or tiny clay pipe stem fragments;
 - corroded and unidentifiable ferrous items; and
 - decayed and non-diagnostic animal bone, shell, leather and fabric.
- Diagnostic, complete and potentially significant artefacts from non-significant layers and disturbed fills would be collected and retained for analysis. Examples of such artefacts include:
 - whole ceramic and glass vessels;
 - partial ceramic and glass vessels which include rim or base sections, or identifiable patterns; – identifiable ferrous and copper nails, horse shoes and horse equipment (metal and leather);
 - buttons, coins and other personal items of various materials (metal, bone, clay, shell, leather etc); and
 - clay pipe bowls.
- Artefacts recovered would be provenanced according to their context. They would be cleaned, sorted and stored in an appropriate repository, observing specialist conservation requirements where appropriate (for example, for metal or leather artefacts).

- Building materials (brick, stone, mortar) and environmental samples (soil, pollen, marine sediment, shell) would be collected from significant contexts for further analysis, archiving purposes and to inform the research questions.

Artefacts recovered during the archaeological investigation are the property of the landowner, Lendlease. The long-term storage of artefacts recovered from the archaeological excavation is the responsibility of the applicant (Lendlease). A suitably safe and secure repository for long-term storage within the new development or an appropriate alternative location should be identified.

Monitoring report

A short letter-form report would be prepared following the completion of the monitoring program. The report would include the following:

- a plain English executive summary of the archaeological findings;
- an overview of the archaeological investigation program and methodology;
- detailed description and analysis of the archaeological findings, phasing and interpretation;
- an outline of the study area's historical background, including additional primary or secondary resource research if required;
- photographs, scale drawings/surveys and interpretive graphics;
- reassessment of archaeological potential and significance and the further research potential of the archaeological collection and study area, if required;
- revised archaeological sensitivity mapping and management guidelines for the proposed subdivision and future development.
- details of the archaeological collection repository, long-term management and access; and
- technical and specialist reports, detailed site plans and survey drawings, context and site registers, artefacts and samples catalogue, and site photograph contact sheets included as appendices.