

6 June 2025

Sandra Hutton
Planning Manager
DB20 Pty Limited
365 New South Head Road
Double Bay NSW 2028

Our Reference: 21-0037 Anambah Urban Release Area

Re: Anambah Urban Release Area—Development Application

Dear Sir/Madam,

DB20 Pty Limited (DB20) have engaged GML Heritage Pty Ltd (GML) to prepare an Aboriginal cultural heritage assessment report (ACHAR) for their landholdings within the Anambah Urban Release Area (AURA). This report forms part of the Development Application's (DA) environmental assessment prepared under Part 4 of the NSW *Environmental Planning and Assessment Act 1979*.

The results of this assessment have informed recommendations for the management of Aboriginal cultural heritage (ACH) during development within the DB20 AURA landholdings. These are outlined in Section 6 of GML's ACHAR. This letter outlines the implications of the current proposal on ACH values.

Aboriginal heritage context

In 2023, GML finalised an ACHAR, with supporting Archaeological Technical Report (ATR; ACHAR Appendix D), for the DB20 AURA landholdings. These reports detail the results of consultation with the Aboriginal community under the Heritage NSW *Aboriginal community consultation requirements for proponents 2010*, the archaeological fieldwork (pedestrian survey and test excavation) and scientific assessments undertaken, and provides the impact assessment, mitigation and management recommendations for Aboriginal objects.

The work undertaken to inform the ACHAR has identified ACH cultural/social, scientific and aesthetic values associated with the AURA landholdings.

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These values are associated with several Aboriginal stone artefact sites (cultural lithics or Aboriginal objects), and four viewing locations, where observation of the local and regional landscape can be made. The principles, strategies and requirements for ACH management of impacts resultant from proposed urban development are detailed throughout the ACHAR.

Consultation with Heritage NSW (14 November 2023) has confirmed that a whole of DB20 land Aboriginal Heritage Impact Permit (AHIP) can be issued, allowing for the implementation of these ACH management strategies. This will be conditioned with hold points that 'harm' to certain ACH sites can occur by development stage upon receipt of approved development consent.

Implications for the Development Application

Under the current DA proposal, six Aboriginal stone artefact sites (PADs 7, 8, 9, 10, 12 and 14) would be impacted by the proposed works (refer to Figure 1). GML's ACH management recommendations for each of these sites is annotated in Figure 1. These recommendations are based on the outcomes of archaeological survey, excavations and Aboriginal community consultation, which have determined each site holds either limited numbers, or there is a complete absence, of Aboriginal stone artefacts.

For the current DA, GML has recommended that surface collection of Aboriginal stone artefacts proceed within PADs 12 and 14 prior to development. No further ACH management or mitigation is required for PADs 7, 8, 9 and 10. Works across the remaining DA area can proceed subject to an Unexpected Finds Procedure. Please note that these actions can only occur following issue of the AHIP.

Future DAs will require further ACH management, which is not detailed in this letter. Heritage NSW will consider a plan and spatial data that defines progressive active and non-active areas within the AHIP related to each development consent and confirm the works under each DA are consistent with the proposal as detailed in the ACHAR.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jacob Kiefel'.

Jacob Kiefel

Consultant

GML Heritage Pty Ltd

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