



12 December 2006

Mr Dan Keary  
Planning Manager - St Marys  
Delfin Lend Lease  
Ropes Crossing Project Office,  
Private Road Off Forrester Road,  
St Marys NSW 2760,

Dear Dan

Re: Dunheved Precinct Development Applications (filling, subdivision and works).

I have write in reference to the current development applications, which relate to filling the entire Dunheved precinct (other than the riparian corridor that runs through the site) and for subdivision and works within the Precinct (Figure 1). A number of sites and areas of archaeological sensitivity have been located within this Precinct (see Figure 2). The DA that relates to filling Dunheved Precinct also includes proposed earthworks in the Regional Park to mitigate flood impacts (Figure 3). The works required in the Regional Park include lowering the embankment by 0.5m for an area approximately 140m long and 25 m wide (Figure 4). I confirm that the current development proposal will impact on several areas of archaeological sensitivity within the Dunheved Precinct (see Figure 2). The proposed embankment removal will not impact on any identified areas of archaeological sensitivity. The earthworks proposed to lower the existing embankments represent already disturbed features.

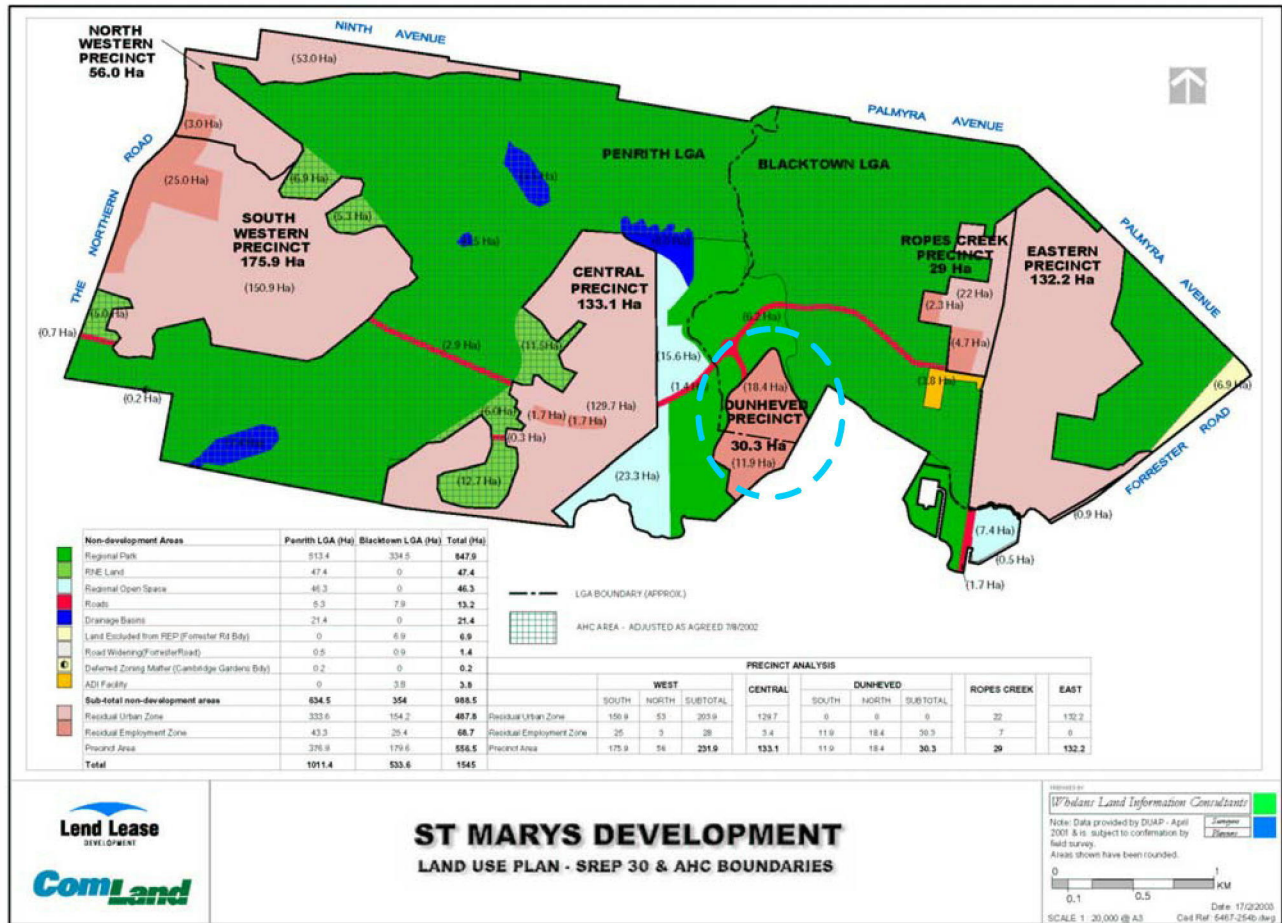
Detailed management recommendations regarding the Dunheved Precinct have been outlined in the JMcD CHM (2005) report *Archaeological assessment of Indigenous Heritage values in the Dunheved Precinct of the St Marys Development*. The embankments were inspected in November 2006 to ascertain the likely development impact (see below)

In the 2005 study it was found that there is generally low archaeological sensitivity within the Dunheved Precinct, with more than 97% of the total land area having been moderately or severely impacted by previous land-use impacts archaeological sensitivity. The relevant assessment and recommendations are (JMcD CHM 2005:46-47):

- ☉ Ground truthing of the Precinct has confirmed that the majority of this area has been highly disturbed and contained little or no potential for intact archaeological deposit. No further archaeological investigation is required in the Zone 3 and Zone 4 areas of this Precinct;
- ☉ The basic precepts of the strategic management model are achieved by the Dunheved Precinct planning process (when the Ropes and South Creek Floodplain area of the former ADI Site – i.e. >300 hectares of Quaternary alluvium – is considered as a whole, a significant Indigenous archaeological conservation outcome is achieved by lands to be conserved within the Regional Park);

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Figure 1: The Dunheved Precinct (circled) within the St Marys Development Areas.



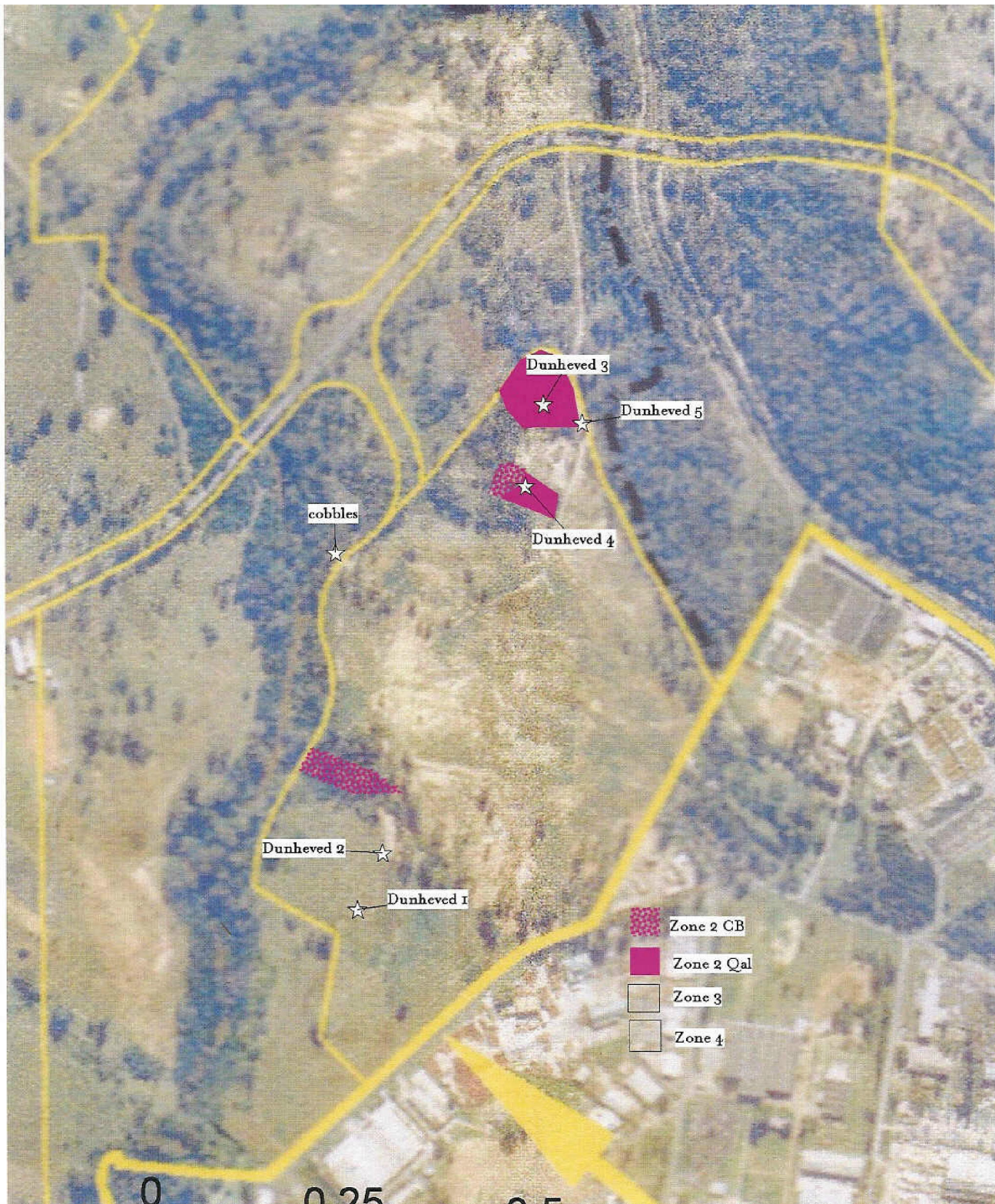
Several areas within the Dunheved Precinct, on the basis of ground-truthing, were upgraded to Zone 2. Two of these locations are identified as requiring archaeological salvage prior to development taking place – as they are to be impacted by the development (Figure 3). These are:

1. An area of floodplain/terrace which includes the surface find of Dunheved 3+5, on the western side of the 1<sup>st</sup> order tributary of South Creek, near its confluence with South Creek, at the north of the North Dunheved Precinct; and,
2. an elevated terrace remnant, possibly associated with palaeo-channels of South Creek, at the vegetated northern 'point' of the North Dunheved Precinct, associated with Dunheved #4.

A total of five Aboriginal stone artefact scatters/open campsites were identified within the Dunheved Precinct. A cluster of ten large silcrete cobbles was also found just outside the study area (Figure 2). The surface evidence and the existing landuse impacts indicate that not all of the surface find located are in good archaeological condition. Hence, only those areas which are designated as falling within management Zone 2 are considered as having archaeological sensitivity.



Figure 2: Dunheved Precinct showing the location of identified surface finds and areas identified as having archaeological sensitivity (Zone 2).



The St Marys Development falls within the boundaries of the Deerubbin Local Aboriginal Land Council (DLALC). The study area also falls within the area of interest



to the Darug Tribal Aboriginal Corporation (DTAC) and the Darug Custodial Aboriginal Corporation (DCAC)<sup>1</sup>. Representatives of the three (then) relevant groups were briefed at the commencement of the Precinct Planning phase by the consultant and client. All three groups participated in survey work undertaken within the Dunheved Precinct.

The Deerubbin LALC's Steve Randall took part in the survey work for the Dunheved Precinct on 15<sup>th</sup> June 2004. Gordon Morton (then DTAC, now DACHA) took part in the survey work on the morning of the 29<sup>th</sup> June 2004. Leanne Wright (DCAC) participated in the survey that afternoon. All groups were asked to produce reports on the cultural values of the Dunheved Precinct lands (JMcD CHM 2005). Consultation with the four identified groups has continued at this DA stage of the planning process.

The former bridge sites where earthworks are proposed to lower existing embankments were inspected by Amy Stevens of JMcD CHM on 15<sup>th</sup> November 2006 (with Steve Randall, Deerubbin LALC) and on the 16 November 2006 with representatives of the three Darug groups (present were Celestine Everingham, Justine Coplin, Jamie Eastwood). The area inspected is c. 25m x 180m long and includes the old railway track and a bitumen road running along its length (see Plates 1 and 2). This area is highly disturbed and representatives of all Aboriginal groups involved in the site inspection agreed that this area has no scientific or cultural values which require further management. Management recommendations are made in relation to this area in accordance with the SMM.



Plate 1: View along the former roadway leading to the Bridge showing made surface.

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<sup>1</sup> Since the time of the original study, DTAC has split into two groups and a fourth interested Aboriginal group now is Darug Aboriginal Cultural Heritage Assessment (DACHA).



Plate 2: View of the embankment to be removed as part of the works proposed in this current DA application.

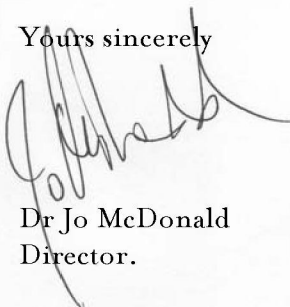
### Recommendations

In line with the designated strategy for managing Indigenous heritage across the St Marys Development, an application should be made by the proponent to the Director General of Department of Environment & Conservation (NSW) for a section 90 Heritage Impact Permit in relation to the entire Dunheved Precinct and associated embankment earthworks. This section 90 would cover both the proposed filling and subsequent subdivision works within the Dunheved Precinct. This Section 90 should be granted by DEC with a condition of the consent being the requirement for salvage of the two defined archaeologically sensitive areas at the northern end of the Precinct (sites Dunheved 3+5 , Dunheved 4).

The Aboriginal community may wish to be involved in monitoring initial earth-clearing construction works, and will require further consultation at the s.90 application stage. Collection of silcrete cobbles from across this area should occur before construction commences.

Please contact me if you require further information.

Yours sincerely



Dr Jo McDonald  
Director.



Figure 3: Map showing extent of proposed filling within the Dunheved Precinct (circled) and within the Regional Park and Central Precinct. The locations of the two bridges/embankment areas where rehabilitation is required are arrowed.

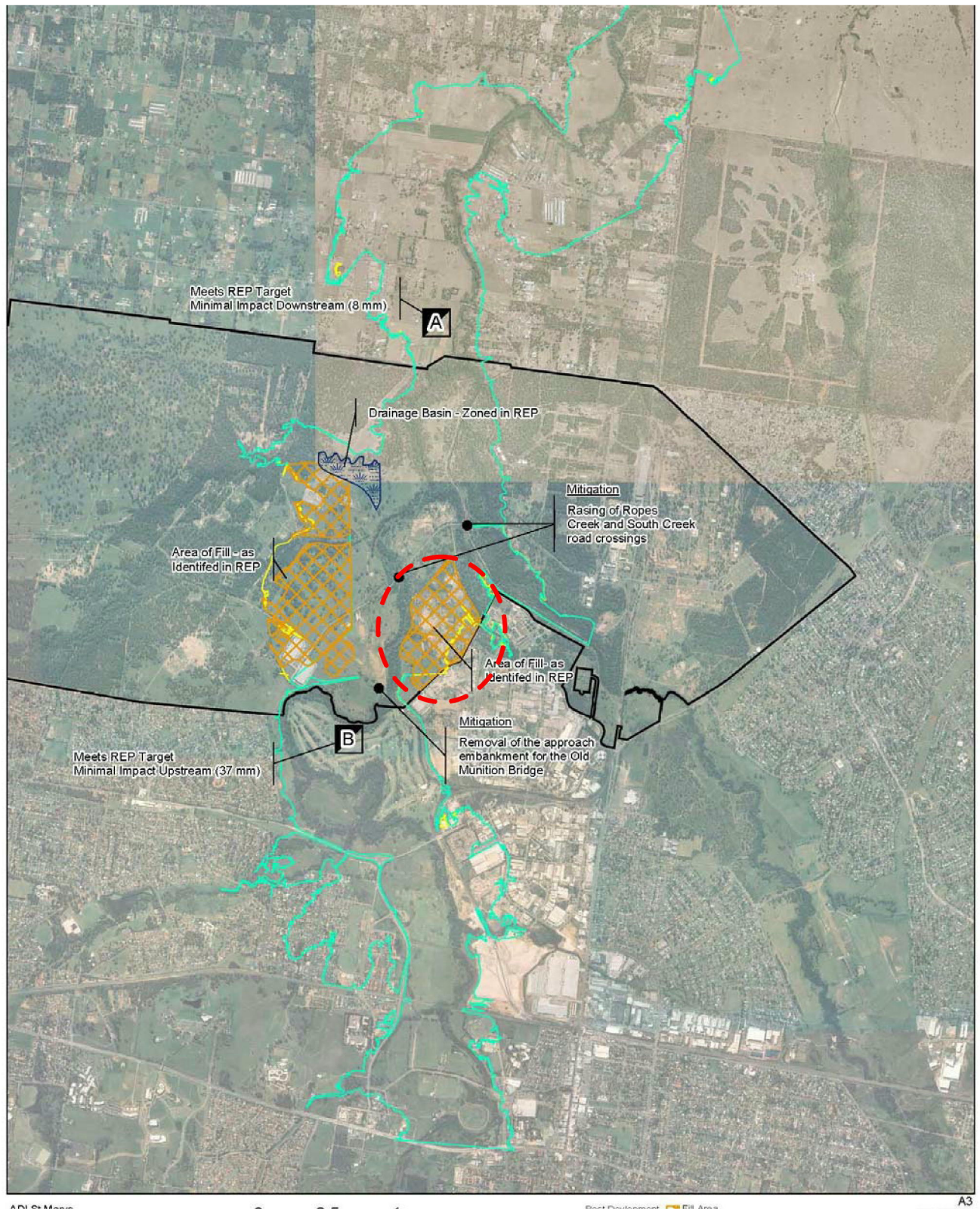




Figure 4: Location of proposed embankment- removal works within the Regional Park

