



Metro
Body of
Knowledge

Planning Approval Consistency Assessment Form

SM-17-00000111

Sydney Metro – Metro Body of Knowledge (MBoK)

Assessment Name:	Patons Lane - Revised construction footprint
Prepared by:	Sydney Metro and PLM
Prepared for:	Sydney Metro / Stations, Systems, Trains, Operations and Maintenance (SSTOM) contractors
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1. Existing Approved Project

Planning approval reference details (Application/Document No. (including modifications)):

SSI_10051 Infrastructure approval – applies to this assessment

EPBC 2020/8687 – applies to this assessment as the proposal will be undertaken within the area between St Marys to Elizabeth Drive.

Western Sydney Airport: Airport Plan (as varied September 2021) - does not apply to this assessment as the proposal will be undertaken outside of the Western Sydney Airport site.

Date of determination:	- SSI_10051 Infrastructure approval dated 23 July 2021 - EPBC 2020/8687 Approval dated 3 June 2021 - Western Sydney Airport: Airport Plan as varied 15 September 2021 - does not apply to this assessment	Type of planning approval:	SSI_10051: Critical State Significant Infrastructure (SSI_10051) under Environmental Planning and Assessment Act 1979 (NSW) EPBC 2020/8687: construct and operate a rail link from St Marys to Elizabeth Drive as a controlled action under Environment Protection and Biodiversity Conservation Act 1999 (Cth) Western Sydney Airport: Airport Plan (as varied September 2021): Variation to the Airport Plan under the Airports Act 1996 (Cth)
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Relevant background information (including EA, REF, Submissions Report, Director General's Report, MCoA):

- Sydney Metro – Western Sydney Airport Environmental Impact Statement, including accompanying technical papers (SM-WSA EIS) (October 2020)
- Sydney Metro – Western Sydney Airport Submissions Report (April 2021)
- Instrument of Approval (SSI_10051) (dated 23 July 2021)
- SSI 10051 Modification 1 (dated 14 April 2022)
- SSI 10051 Modification 2 (dated 20 December 2024)

The above documents are available on the NSW Major Projects portal here: <https://www.planningportal.nsw.gov.au/major-projects/projects/sydney-metro-western-sydney-airport> and <http://epbcnotices.environment.gov.au/referralslist/#>

The proposal identified in this assessment would be undertaken in accordance with the performance outcomes (POs) and Revised environmental mitigation measures (REMMs) identified in the EIS, Submissions Report, and the relevant conditions of approval.

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Description of existing approved project you are assessing for consistency:

Patons Lane forms part of the construction vehicle access route to the Stabling and Maintenance Facility (SMF) site. The use of the road has been assessed in the Environmental Impact Statement (EIS) and the Submissions Report for the Sydney Metro – Western Sydney Airport (SM-WSA) project.

Environmental Impact Statement

Construction

As discussed in Section 9.4.1 of the SM-WSA EIS, Patons Lane is a local road that is characterised by unsealed road shoulders, poor pedestrian and cycle facilities. Patons Lane was identified in the EIS as a road to be used for construction vehicle access (see Appendix A - Figure 1 (EIS Figure 8-20)). Traffic impacts during construction were assessed at the intersection of Luddenham Road and Patons Lane and the addition of construction vehicles was found to result in increased delays and additional queueing.

Operation

As discussed in Section 7.5.1 of the SM-WSA EIS, the final configuration of the SMF allows for access/egress from Patons Lane for both light vehicles for general staff and large vehicle access (see Appendix A Figure 2 (EIS Figure 7-39)). The SMF will incorporate the operations control centre and administrative building as well as the diver training facility. The Submissions Report describes parking for up to 140 cars for staff and visitor use would be provided within the site, along with maintenance vehicle parking (Section 1.5.1).

2. Description of proposed change which is the subject of this assessment

Access to the SMF site from Patons Lane has been subject to detailed design. This consistency assessment makes an assessment of the road work required to tie-in the permanent SMF access road to the north verge of Patons Lane. Works include minor grading and pavement work over a distance of approximately 35m east of the existing project boundary. The design of the permanent access road provides the minimum swept path required for heavy vehicle access and also accommodates the adjacent maintenance road/shared path (see Figure 3 Appendix A).

This consistency assessment confirms that:

- The work would be wholly within the existing Patons Lane easement and there would be no further property impacts
- There would be no impact to vegetation in the Patons Lane easement
- Works within the area would be included on the Project Environmental Protection Licence Premise Map (EPL 21807)
- There are no changes to the operation of the project.

The existing and proposed project footprint is shown in Figure 3 and Figure 4 of Appendix A.

3. Timeframe

The work is scheduled the end 2026 and would take approximately 2-3 weeks to complete. The proposed change does not impact the wider construction program.

4. Site description

The proposal would be located entirely within the Patons Lane road reserve. The location of the proposal is shown on Figure 3 of Appendix A. As a local road, Patons Lane is managed by Penrith City Council.

5. Site Environmental Characteristics

Patons Lane is a narrow local road which terminates at the Patons Lane Resource Recovery Centre (RRC). Stockdale Road, opposite the RCC, has been closed by Penrith City Council prior to Parklife Metro commencing work at the SMF site. Major urban development is currently under construction to the north at 221-227 Luddenham Road, with the primary access to the site via Patons Lane. The nearest residential receiver is located approximately 800m north-east of the site at 117-199 Luddenham Road. An unnamed tributary of South Creek is approximately 450m east of the proposed work area.

Patons Lane road reserve includes areas of remnant vegetation described as Plant Community Type (PCT) 835. The condition of the vegetation in the vicinity of the proposed road tie-in works is described as 'thinned' with vegetation further east along the road reserve described as 'intact'. PCT 835 corresponds to the River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions which is listed as a threatened ecological community under the *Biodiversity Conservation Act 2016*.

The proposal is located entirely within the Penrith Local Government Area. The land on which the proposal is located is zoned as C2 Environmental Conservation / Environmental Management mixed use and enterprise under the consolidated State Environmental Planning Policy (Precincts – Western Parkland City) 2021.

6. Justification for the proposed change

The permanent access road to the SMF is part of the approved project. The SMF requires permanent access to the track alignment as well as an internal access road network for the general circulation of vehicles on the site. The detailed design for the SMF access road requires minimum swept path requirements for heavy vehicles entering the site. Grading and pavement works are required along the northern verge of Patons Lane to form the required road geometry. These works extend approximately 35m outside the existing project boundary. The road work can not be adjusted further to fit within the project boundary as the design must continue to accommodate the separate maintenance road/shared path while meeting relevant design, engineering and safety standards. The proposed road layout is the minimum footprint for the required access roads to the SMF.

The road design and final road marking and signage has been consulted with Penrith City Council and the signage and line marking plan was formally endorsed through Council's Local Transport Forum at a Council meeting on 1 December 2025. Appendix B includes the endorsed plan.

7. Environmental Benefit

The proposal ensures the road tie-in to Patons Lane provides the required access to the SMF while meeting the required design, engineering and safety standards

8. Control Measures

Will a project and site specific EMP be prepared?	☐ Yes	Are appropriate control measures already identified in an existing EMP?	☒ Yes
	☒ No		☐ No

9. Conditions of approval / Environmental mitigation measures

Number	Condition of Approval/ Environmental mitigation measure	Discussion on relevance and consistency for proposed change
SSI CoA A1	The proponent must carry out the CSSI in accordance with the terms of this approval and generally in accordance with the: (a) Sydney Metro – Western Sydney Airport Environmental Impact Statement dated 21 October 2020; (b) Sydney Metro – Western Sydney Airport Submissions Report submitted April 2021; (c) Sydney Metro – Western Sydney Airport. NSW Infrastructure Approval (SSI_10051) – Request for modification of Condition E4, dated March 2022; and (d) Sydney Metro – Western Sydney Airport, SSI-10051, Request for Modification to Conditions E13 and E57. Correspondence dated 12 August 2024.	The proposed works will be carried out in accordance with the approval as well as the SM-WSA EIS and Submissions Report and modifications.
SSI CoA E2	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities and threatened species habitat.	The proposed works would not require clearing of any vegetation and trees within the road reserve would be avoided by the work. A tree protection zone would be put established on site and marked on the relevant environmental control map.
SSI CoA E36	The Unexpected Heritage Finds and Human Remains Procedure, as submitted to the Planning Secretary, must be implemented for the duration of construction...	The project has an existing Unexpected Heritage Finds and Human Remains Procedure. This procedure will be implemented for the duration of construction.
SSI CoA E38	Work must only be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 1:00pm Saturdays; and (c) at no time on Sundays or public holidays.	Works will generally take place during standard construction hours. OOHW required would be subject to the Sydney Metro OOHW protocol or the project EPL (no. 21807).

SSI CoA E42	An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of work (not subject to an EPL) that is outside the hours defined in Conditions E38 and E39.	OOHW required would be subject to the Sydney Metro OOHW protocol or the project EPL (no. 21807).
SSI CoA E110	Access to all utilities and properties must be maintained during works, unless otherwise agreed with the relevant utility owner, landowner or occupier.	Access to the Patons Lane Resource Recovery Centre will be maintained during the work. All other users of Patons Lane are to the east of SMF access road and would not be impacted by the work.
SSI CoA E119	Permanent road works, including vehicular access, signalised intersection works, and works relating to pedestrians, cyclists, and public transport users must be subject to safety audits demonstrating consistency with relevant design, engineering and safety standards and guidelines. Safety audits must be prepared in consultation with the relevant Traffic and Transport Liaison Group before the completion and use of the subject infrastructure and must be made available to the Planning Secretary upon request	A Road Safety Audit has been prepared as part of SMF Civil Works and Roadway Design Report SMFCV0302. (See Appendix S SMWSASSM-PLD-OHE-SF153-CV-RPT-000001)
SSI CoA E128	Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book)	No change from the approved project. The SMF Erosion and Sediment Control Plan will be updated to include the worksite conditions in accordance with the 'Blue Book'.

Will the proposed change be consistent with the conditions of approval?	☒ Yes
	☐ No

10. Impact Assessment – Construction

Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
Biodiversity	Vegetation in the Patons Lane road reserve has been mapped by Biosis (2018) for the investigation carried out as part of the Greater Penrith to Eastern Creek Urban Release Area. The vegetation is described as Plant Community Type (PCT) 835. The condition of the vegetation in the vicinity of the proposed road tie-in works is described as 'thinned' with vegetation further east along the road reserve described as 'intact'. PCT 835 corresponds to the River-Flat Eucalypt Forest on Coastal Floodplains of the New South Wales North Coast, Sydney Basin and South East Corner Bioregions which is listed as a threatened ecological community under the <i>Biodiversity Conservation Act 2016</i>. The project team have confirmed that clearing of vegetation would not be required as works will be undertaken in the carriage way of the road. As no vegetation removal is required the works are consistent with the direct impacts described in the EIS. All the works will be managed in accordance with the approved Flora and Fauna Management Sub-plan - SMWSASSM-PLD-1NL-PC-PLN 000023. This includes establishing tree protection zones as required. No change from the approved project.	No additional mitigation measures required	Y	N	Y	N/A
Water	The proposed works are approximately 450m north west of a tributary of South Creek. Erosion	No additional mitigation measures required	Y	N	Y	N/A

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					Y/N	Comments
	and Sediment Control Plans (ESCPs) will be developed for all the worksite in accordance with the approved Soil and Water Management Sub-plan -SMWSASSM-PLD-1NL-PC-PLN-000020. Surfaces will be re-instated and fully stabilised following the completion of the proposed works. No change from the approved project.					
Soils and contamination	The proposal would not result in any change to the location of areas of environmental concern, potential contamination sources and overall risk ratings, compared to the approved project. The Contamination and Asbestos Unexpected Finds Procedure will be implemented during the construction works as outlined in the approved Soil and Water Management Sub-plan - SMWSASSM-PLD-1NL-PC-PLN 000020. No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Air quality	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Noise and vibration	The nearest rural residential property is located approximately 800m to north east of the work area. There would be no change from the approved project and all works would be managed in accordance with the approved Parklife Metro Noise and Vibration Management Sub-plan - SMWSASSM-PLD-1NL-PC-PLN 000024, including any OOHV if required	No additional mitigation measures required	Y	N	Y	
Aboriginal Culture and Heritage	A search of the Aboriginal Heritage Information Management System (AHIMS) was carried out on the 3 June 2026 (see Appendix C). The	No additional mitigation measures required	Y	N	Y	

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Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
	Environmental Reviews for Patons Lane; Utility Undergrouting ER-WSA-002 (iCentral SM-22-00010776 dated 15/02/2022) and Patons Lane operational power works E0008 (iCentral SM-23-00007343 dated 09/03/2023) were also reviewed for relevant Aboriginal heritage investigations. Patons Lane operational power works E0008 noted the location of 45-5-5412, a Potential Archaeological Deposit (PAD) located north of Patons Lane and to the west of Luddenham Road. The location of this site has been reviewed and confirmed to be approximately 850 m east of the proposed works. Due to the distance, impacts to this site from the proposed work are not anticipated. Any unexpected heritage finds would be managed as per the Sydney Metro Unexpected Heritage Finds Procedure and Exhumation Management Procedure. No change from the approved project.					
Historic Heritage	The nearest non-Aboriginal heritage item in the vicinity of the works is the Luddenham Road alignment, which has been listed as an item of local significance (item number 843) under the Penrith Local Environment Plan. No impacts are expected due to the distance between the proposed works and the heritage item which is approximately 1km from the work area. Any unexpected heritage finds would be managed as per the Sydney Metro Unexpected Heritage Finds Procedure and Exhumation Management Procedure.	No additional mitigation measures required	Y	N	Y	

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					Y/N	Comments
	No change from the approved project.					
Community and socio-economic	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Traffic and transport	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Waste and resource management	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Visual	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Land use and property	There would be no change to land use	No additional mitigation measures required	Y	N	Y	
Hazard and risk	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Other <i>Such as geotechnical, climate change, cumulative</i>	A climate change risk assessment was undertaken as part of Chapter 17 of the SM-WSA EIS. As discussed in Section 17.4.2, climate change risk would be assessed throughout design development and risk treatments would be progressively incorporated as appropriate. The potential climate change risks identified in Table 17-3 of the EIS were considered to present the most material risks to the operational performance of the project including extreme heat and extreme rainfall and flooding events. The proposal would not require any changes to the climate change risks and risk treatments identified in Table 17-3 of the EIS	No additional mitigation measures required	Y	N	Y	

11. Impact Assessment – Operation

Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
Biodiversity	No change from the approved project.	No additional mitigation measures required	Y	N	Y	N/A
Water	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Soils and contamination	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Air quality	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Noise and vibration	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Aboriginal Culture and Heritage	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Historic Heritage	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Community and socio-economic	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Traffic and transport	The proposal provides appropriate safe road integration with the existing Paton Lane alignment.	No additional mitigation measures required	Y	N	Y	
Waste and resource management	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Visual	No change from the approved project.	No additional mitigation measures required	Y	N	Y	

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Aspect	Nature and extent of impacts (negative and positive) during construction (if control measures implemented) of the proposed change, relative to the relevant impact in the Approved Project	Proposed Control Measures in addition to project CoA and REMMs	Consistent Impact Y/N	Do any CoA need to be changed? Y/N	Endorsed	
					Y/N	Comments
Land use and property	The proposed road works, while outside the existing project boundary, are contained wholly within the existing road reserve. There is no change to landuse from the proposed change.	No additional mitigation measures required	Y	N	Y	
Hazard and risk	No change from the approved project.	No additional mitigation measures required	Y	N	Y	
Other - none	No change from the approved project.	No additional mitigation measures required	Y	N	Y	

12. Consistency with the Approved Project

Question	Response
Is the project (including the proposed changes) consistent with the conditions of approval?	The proposal requires minor road tie-in works outside the existing project boundary to ensure road design, engineering and safety standards are met. The proposal does not change the existing Approved Project. The proposed works would be consistent with the conditions of approval.
Is the project (including the proposed changes) consistent with the objectives and functions of elements of the Approved Project?	The proposal would be consistent with the objectives and functions of the Approved Project. Section 7.5.1 of the EIS states access is required to the SMF site from Patons Lane and this proposal ensures appropriate design, engineering and safety standards are met for that access road.
Are the environmental impacts of the proposed change consistent with the impacts of the approved project?	The potential environmental impacts from the proposed change are minor to negligible. All potential impacts are managed within the existing project documentation and no additional mitigation measures are required. The environmental impacts of the proposed change are consistent with the approved project.
Are there any new environmental impacts as a result of the proposed works/project changes?	There would be no new environmental impacts as a result of the proposal.
Are the impacts of the proposed activity/works known and understood?	The impacts of the proposal are known and understood. The general layout and proposed methodologies for construction of the SMF access road, as assessed within the EIS and Submissions Report, would remain unchanged.
Are the impacts of the proposed activity/works able to be managed so as not to have an adverse impact?	The impacts of the proposal would be managed so as to avoid an adverse impact by implementing the project CoA, POs, procedures, and REMMs.
Is the proposed change considered to have a significant impact to relevant controlling provisions under the EPBC Act?	The works do not have any impact on any matters under the EPBC Act.
Would any Conditions of Approval be required to be changed as a result of the proposed change (having regard to the above assessment)?	☐ Yes ☒ No
Is the proposed change/s consistent with the approval (having regard to the above assessment)?	☒ Yes ☐ No

13. Other Environmental Approvals

Identify all other approvals required for the proposed works:

N/A

14. Recommendation

Based on the above impact assessment, and with reference to the SM-WSA EIS and Submissions Report including the conditions of approval, it is recommended that:

Tick relevant box	
The proposed change has negligible or more than negligible impacts on the environment or community however is consistent with the Approval, including the conditions of approval. The proposed impacts are consistent with those assessed for the Approved Project (i.e., does not trigger a change to the conditions of approval).	☒
The proposed change is not consistent with the Approved Project including the conditions of approval and would be subject to a separate modification application.	☐
The proposed change is not substantially the same as the Approved Project and is considered a radical transformation. A new planning pathway should be considered.	☐

Author certification

I certify that to the best of my knowledge this Consistency Checklist:

- Examines and takes into account the fullest extent possible all matters affecting or likely to affect the environment as a result of activities associated with the proposed change; and
- Examines the consistency of the proposed change with the Approved Project; is accurate in all material respects and does not omit any material information.

Name:	[REDACTED]	Signature:	[REDACTED]
Title:	Environment Approvals Manger		
Company:	Parklife Metro D&C	Date:	24/06/2026

Assessment Supporting Signature

Application supported and submitted by			
Name:	[REDACTED]	Date:	25/06/2026
Title:	Environment Manager	Comments:	
Signature:	[REDACTED]		

Assessment Endorsement

Based on the above assessment, are the impacts and scope of the proposed change consistent with the existing Approved Project?

Yes ☒ The proposed change is consistent with the Approved Project and no further assessment is required.

No ☐ The proposed change is not consistent with the Approved Project.

A modification or a new activity approval/ consent is required. Advise Senior Project Manager of appropriate alternative planning approvals pathway to be undertaken.

Endorsed by			
Name:		Date:	25/06/2026
Title:	A/Senior Manager Planning Approvals	Comments:	N/A
Signature:			

Appendix A Figures

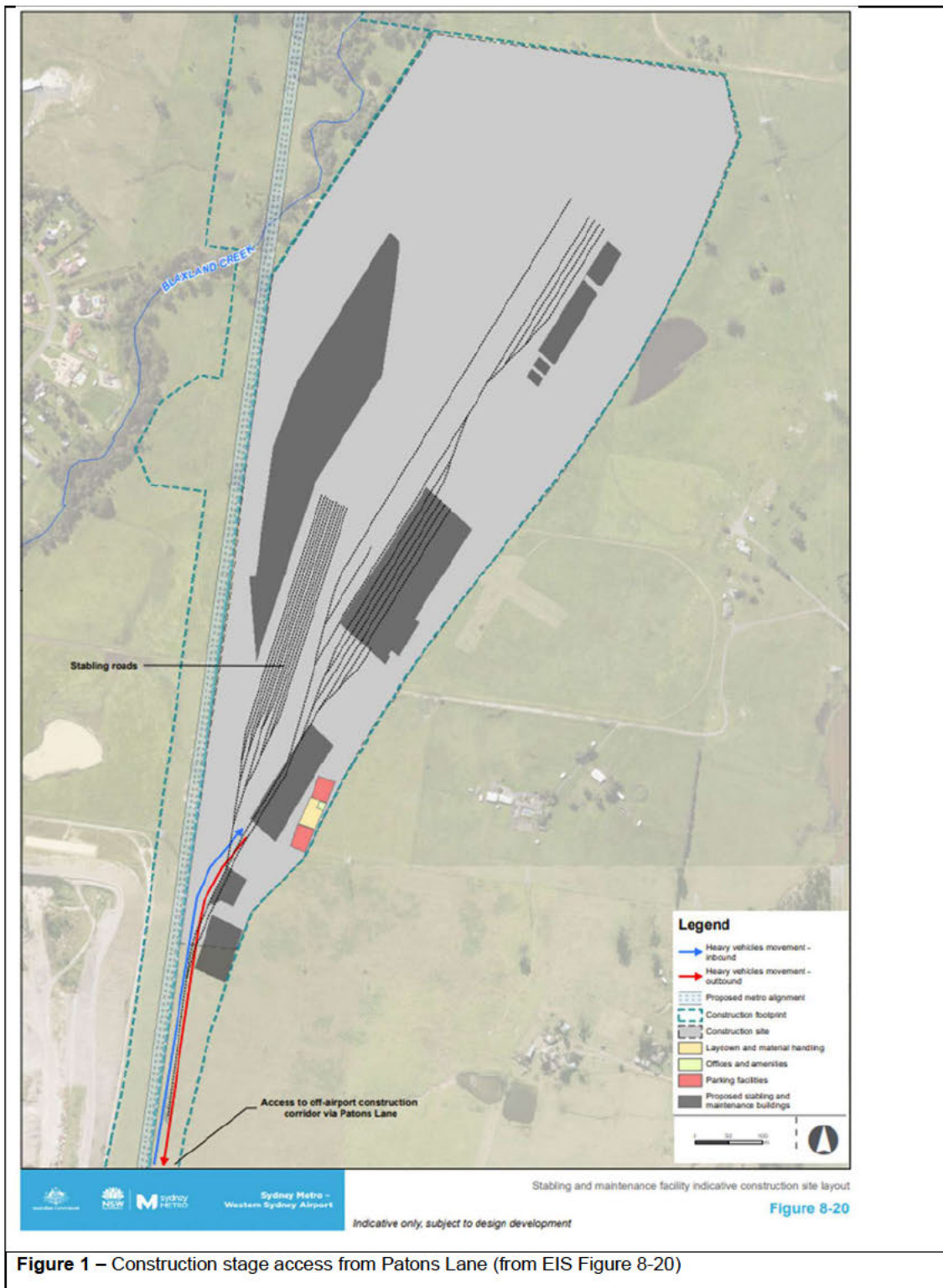


Figure 1 – Construction stage access from Patons Lane (from EIS Figure 8-20)

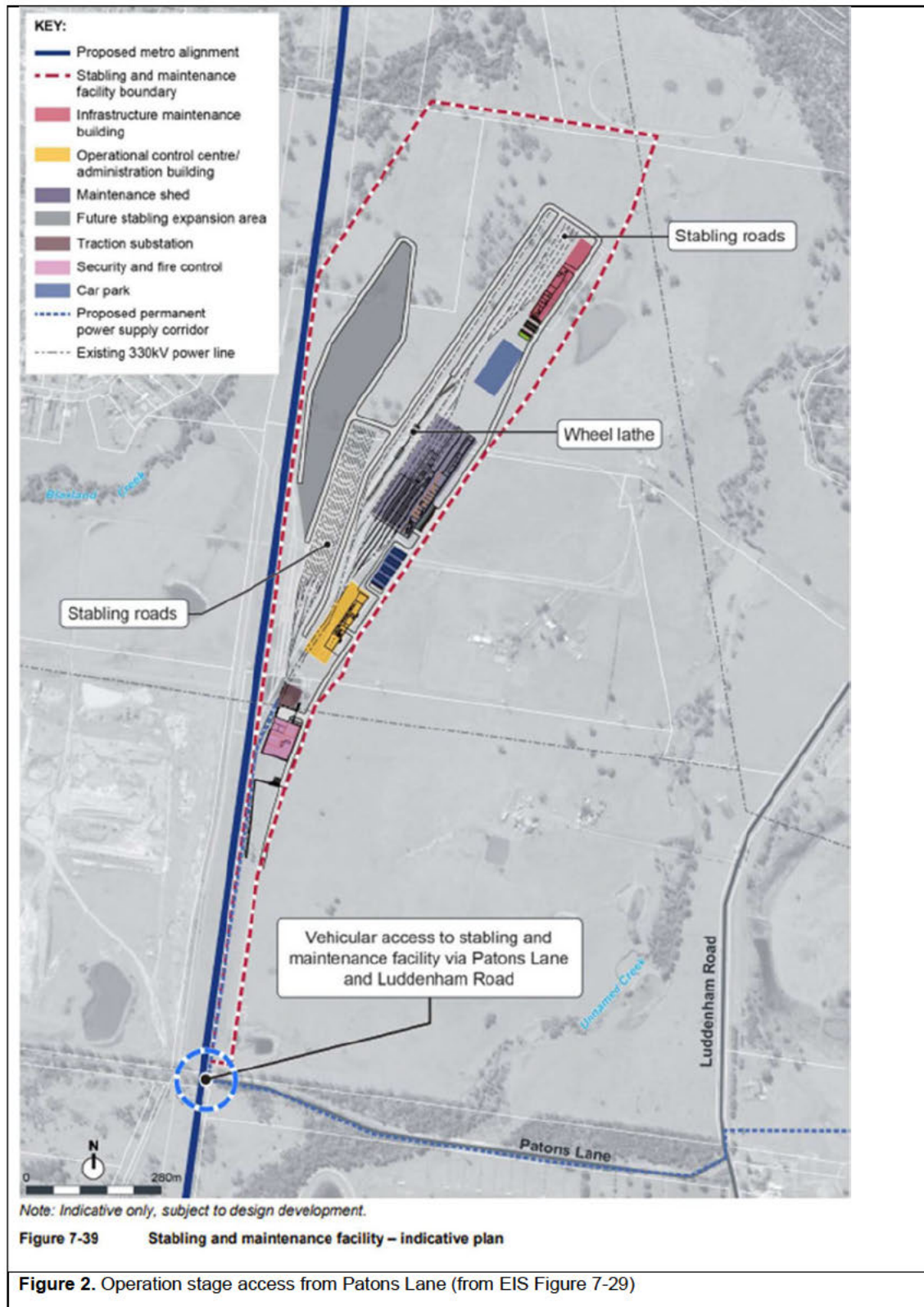




Figure 3 – Existing construction boundary (orange) and proposed road work

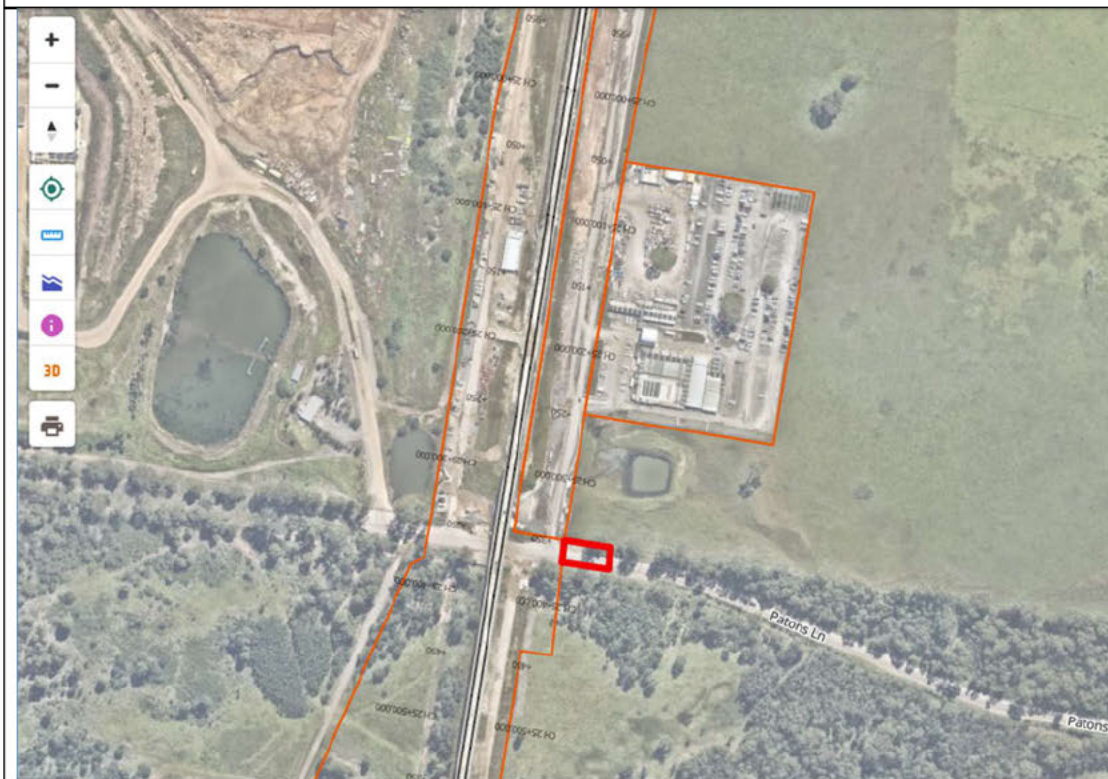


Figure 4 – Proposed construction boundary (addition in red)

Appendix B Signage and Line Marking Plan

Appendix C **Aboriginal Heritage Information System Search Results**

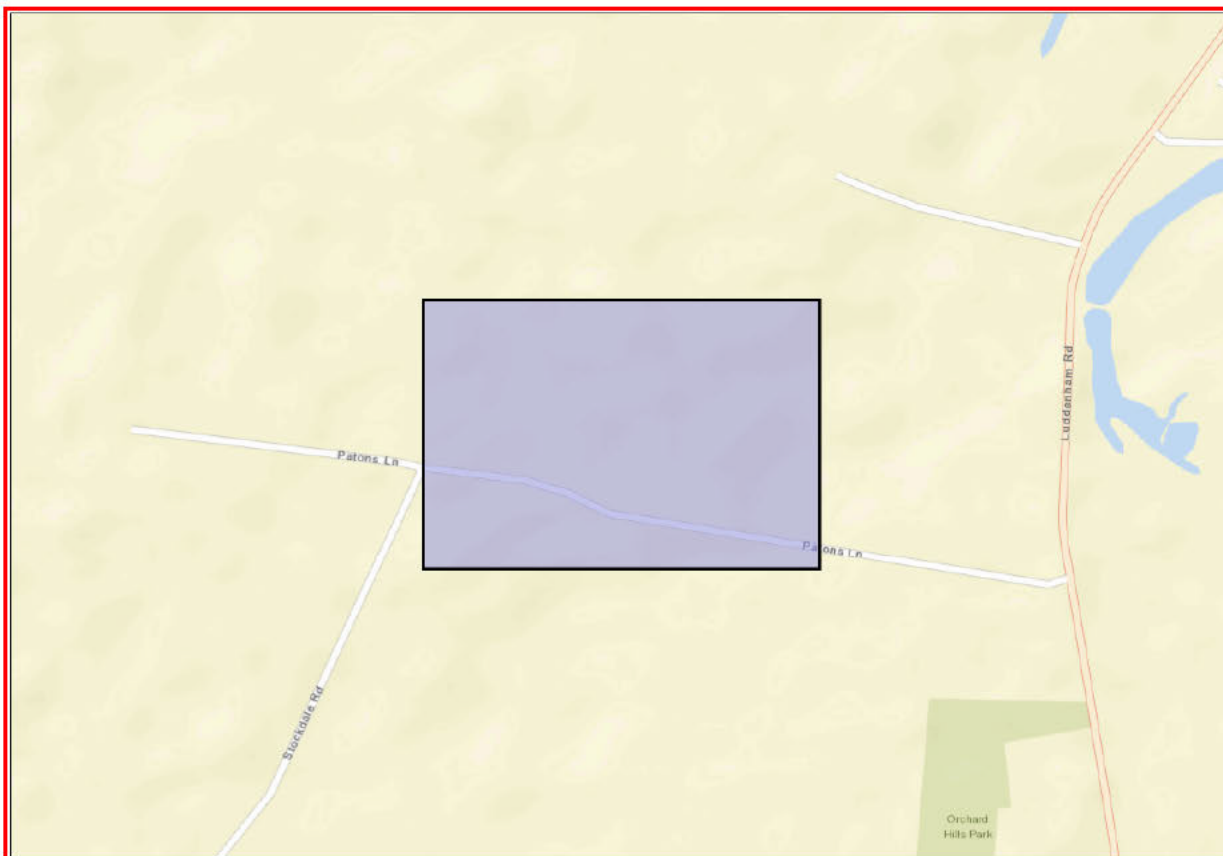
Bradford Environmental Consulting

Date: 03 June 2026



AHIMS Web Service search for the following area at Lat, Long From : -33.8178, 150.7474 - Lat, Long To : -33.8133, 150.7552, conducted by [REDACTED]

The context area of your search is shown in the map below. Please note that the map does not accurately display the exact boundaries of the search as defined in the paragraph above. The map is to be used for general reference purposes only.



A search of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown that:

0	Aboriginal sites are recorded in or near the above location.
0	Aboriginal places have been declared in or near the above location. *

If your search shows Aboriginal sites or places what should you do?

- You must do an extensive search if AHIMS has shown that there are Aboriginal sites or places recorded in the search area.
- If you are checking AHIMS as a part of your due diligence, refer to the next steps of the Due Diligence Code of practice.
- You can get further information about Aboriginal places by looking at the gazettal notice that declared it. Aboriginal places gazetted after 2001 are available on the [NSW Government Gazette \(https://www.legislation.nsw.gov.au/gazette\)](https://www.legislation.nsw.gov.au/gazette) website. Gazettal notices published prior to 2001 can be obtained from Heritage NSW upon request

Important information about your AHIMS search

- The information derived from the AHIMS search is only to be used for the purpose for which it was requested. It is not to be made available to the public.
- AHIMS records information about Aboriginal sites that have been provided to Heritage NSW and Aboriginal places that have been declared by the Minister;
- Information recorded on AHIMS may vary in its accuracy and may not be up to date. Location details are recorded as grid references and it is important to note that there may be errors or omissions in these recordings,
- Some parts of New South Wales have not been investigated in detail and there may be fewer records of Aboriginal sites in those areas. These areas may contain Aboriginal sites which are not recorded on AHIMS.
- Aboriginal objects are protected under the National Parks and Wildlife Act 1974 even if they are not recorded as a site on AHIMS.
- This search can form part of your due diligence and remains valid for 12 months.