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Greater Geelong Council

Request for Information (RFI) – 155 Staughton Vale Road, Staughton Vale, VIC

*Aboriginal Cultural Heritage Letter
of Advice*

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Acknowledgment of Country

Urbis acknowledges the Traditional Custodians of the lands we operate on. We recognise that First Nations sovereignty was never ceded and respect First Nations peoples continuing connection to these lands, waterways and ecosystems for over 60,000 years. We pay our respects to First Nations Elders, past and present.

Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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1 Introduction

Urbis has been engaged by Bacchus Marsh Grammar (the Proponent) to provide an Aboriginal Cultural Heritage Letter of Advice (LoA) for 155 Staughton Vale Road, Staughton Vale, Victoria (the subject site). The cadastral details of the subject site are detailed below (Table 1).

Table 1: Cadastral details of the subject site

LGA	Lot/Plan	Address
Greater Geelong	1/TP963816.	155 Staughton Vale Road, Staughton Vale, Victoria

This LoA has been prepared in response to an RFI from Greater Geelong Council that

“Evidence has not been supplied confirming whether or not a Cultural Heritage Management Plan was required for this proposal.”

Overall, the LoA includes the following:

- Overview of the subject site and relevant Aboriginal cultural heritage legislation.
- A review of Victorian Aboriginal Heritage Register (VAHR) via the Aboriginal Cultural Heritage Register and Information System (ACHRIS) and an aerial imagery review.
- Conclusions and recommendations regarding legislative requirements.

The subject site is located in the Greater Geelong local government area (LGA) and has been zoned Farming Zone (FZ) (Figure 1). The proponent is proposing to construct a new school building for primary aged students which includes a new car park, bus drop off area, landscaping and playing spaces, located within the southern section of the site. The proposed development plans are presented in Figure 1 to Figure 3.

1.1 Limitations

- This LoA was prepared to investigate legislative requirements for the protection of Aboriginal cultural heritage in the subject site. This LoA has not assessed the likelihood of historical archaeology being present within the subject site.
- The LoA does not fulfil the requirements of a Preliminary Aboriginal Heritage Test (PAHT), Cultural Heritage Management Plan (CHMP) or historical archaeology assessment. The LoA is preliminary only and is intended to inform the Proponent of requirements as per relevant legislation.
- The data sources relied upon for the investigation of cultural heritage are updated on a regular basis. The Proponent should seek to ensure that the advice provided in this LoA is reviewed for continuing accuracy through the life of the project.
- This LoA consists of a preliminary assessment to inform the proponent of their legal responsibilities within the subject site in support of the proponents RFI documentation.
- Aboriginal community consultation was not undertaken as part of this investigation.

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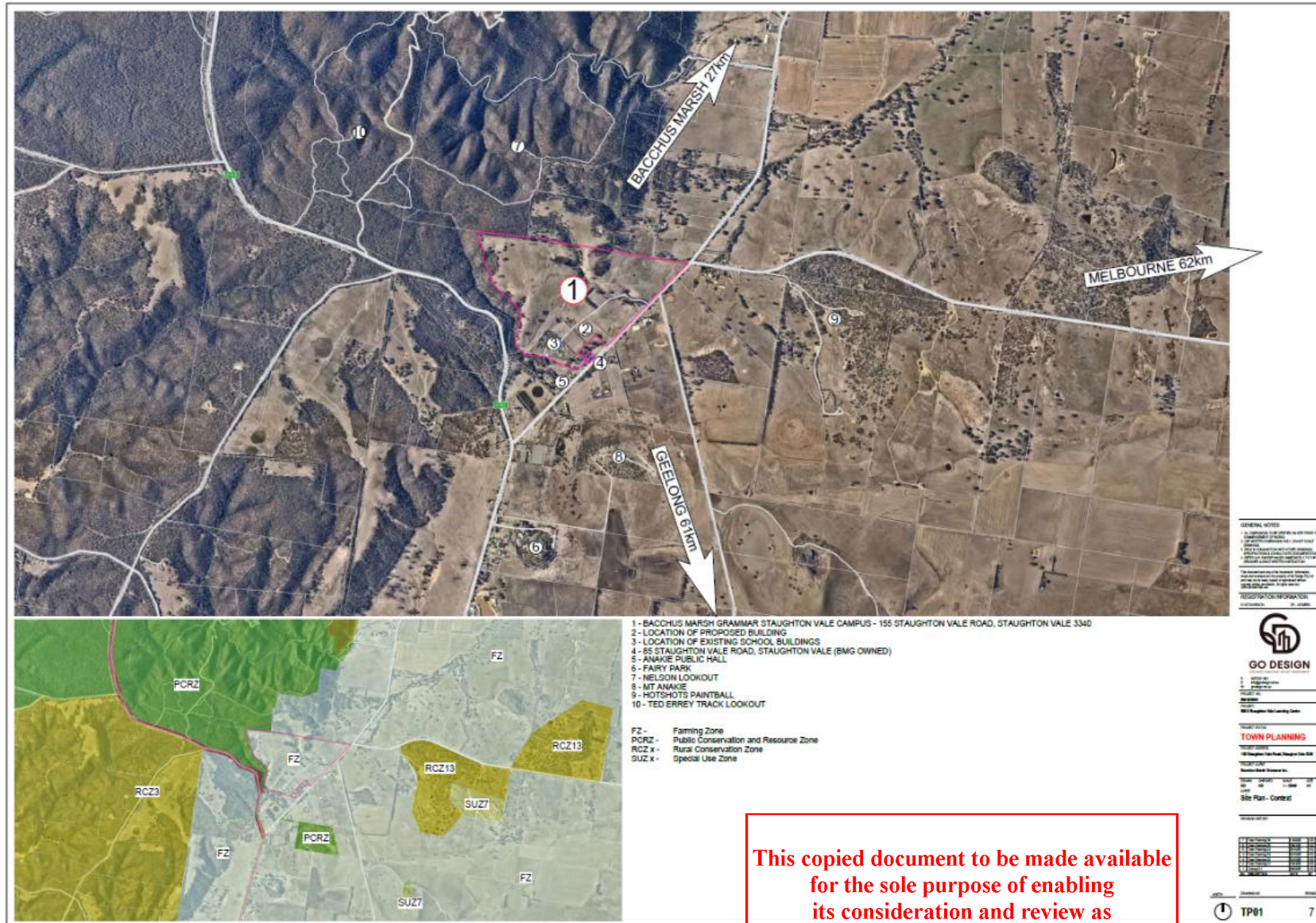


Figure 1: Proposed Development Plans (TP01)

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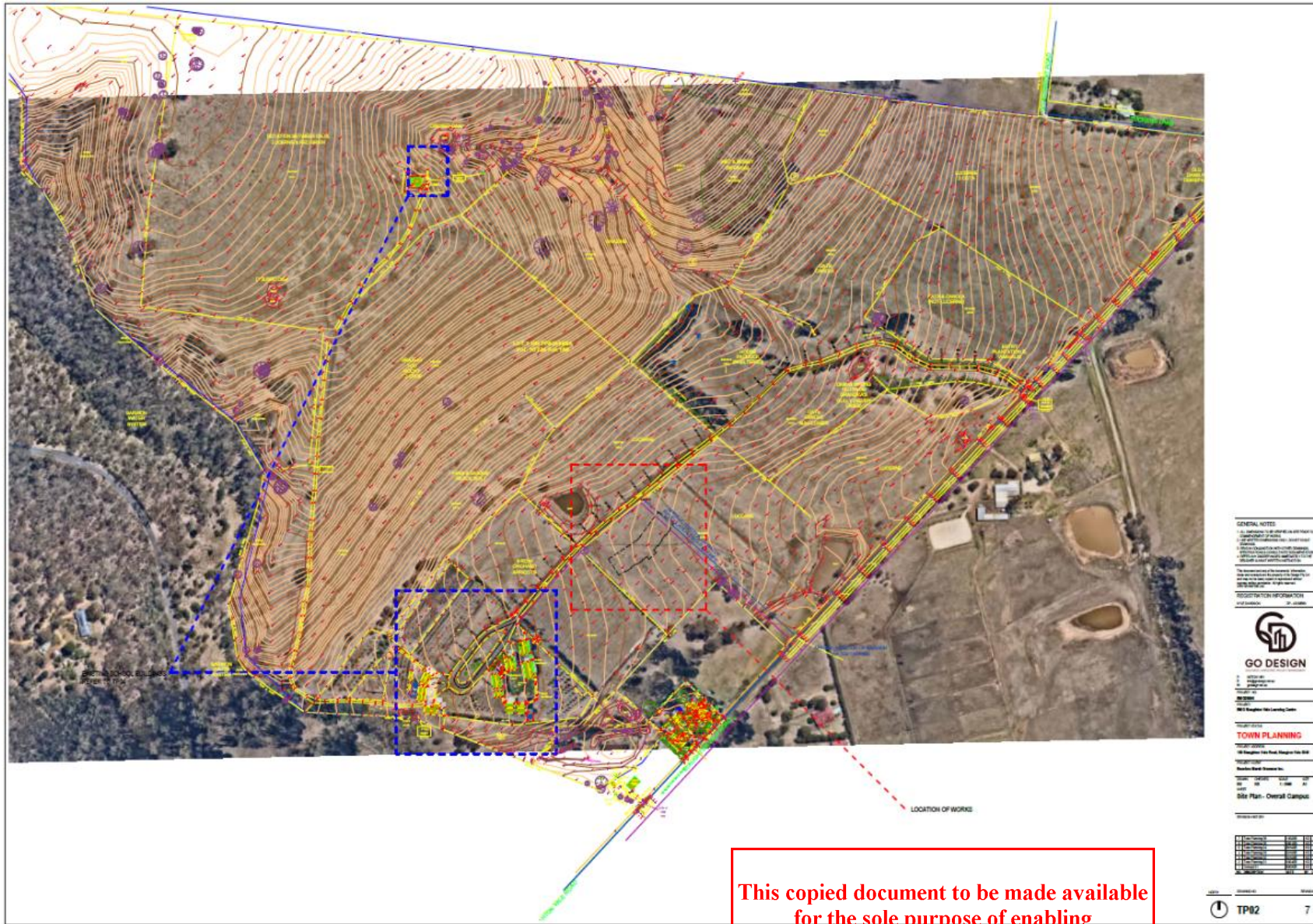


Figure 2: Proposed Development Plans (TP02)

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2 Statutory Context

The protection and management of heritage items, places, cultural heritage, and archaeological sites within Victoria is governed by the relevant Commonwealth, State or local government legislation. These are discussed below in relation to the subject site.

2.1 Aboriginal Heritage Act (2006)

The Aboriginal Heritage Act (2006) (the Act) provides the overarching legal framework and authority for the protection and management of Aboriginal cultural heritage in Victoria. The Act sets out the principles, objectives, and mechanisms for safeguarding Aboriginal heritage, and it establishes the legal basis for the creation and enforcement of specific rules and procedures, which are detailed in the Aboriginal Heritage Regulations (2018) (the Regulations).

2.2 Aboriginal Heritage Regulations (2018)

While the Act stipulates when a Cultural Heritage Management Plan (CHMP) is required, the Regulations identify specific activities and locations which require investigation and cultural heritage management. The Regulations specify that:

A cultural heritage management plan is required for an activity if

- a. *all or part of the activity area for the activity is an area of cultural heritage sensitivity; and*
- b. *all or part of the activity is a high impact activity.*

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2.2.1 Areas of Cultural Heritage Sensitivity

Areas of cultural heritage sensitivity are defined under Division 3 and 4 of the Regulations. A portion of the subject site is in an area of cultural heritage sensitivity under Regulation 32, which specifies that:

- (1) *Subject to sub regulation (2), a park is an area of cultural heritage sensitivity.*

The subject site contains a mapped area of Cultural Heritage Sensitivity associated with the Brisbane Ranges National Park along the northern boundary. This area of cultural heritage sensitivity will not be impacted by the proposed activity

However, as noted by FP-SR on their website (see: <https://www.firstpeoplesrelations.vic.gov.au/cultural-heritage-sensitivity>):

While First Peoples – State Relations maps these areas as accurately as possible, this mapping is indicative only and may not represent the true geographic extent as defined in the Regulations.

As the subject site is not located within the Brisbane Ranges National Park and is private property, the area of Cultural Heritage Sensitivity associated with the Brisbane Ranges National Park should not be located within the subject site, indicating a mapping error.

2.2.2 High Impact Activities

High impact activities are defined in Division 5 of the Regulations. Regulation 46 specifies:

- (1) *The construction of a building or the construction or carrying out of works on land is a high impact activity if the construction of the building or the construction or carrying out of the works—*
 - (a) *would result in significant ground disturbance; and*
 - (b) *is for, or associated with, the use of the land for any one or more of the following purposes—*

(viii) an education centre

As defined by Regulation 46(1)(a)(b)(vii), the construction of an education facility is considered a High Impact Activity.

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3 Proposed Activity

The subject site was developed as a campus for Bacchus Marsh Grammar in 2017 and is utilised for classes that focus on outdoor education, agriculture, environmental awareness and food sustainability. The proponent is proposing to construct a new school building for primary aged students which includes a new car park, bus drop off area, landscaping and playing spaces located within the southern section of the site adjacent to the existing school buildings, driveway and orchards. The proposed development plans are included in Figure 1 to Figure 3.

As defined in the Aboriginal Heritage Regulations 2018:

- A CHMP is triggered when all or part of the activity area for the activity is an area of cultural heritage sensitivity; and all or part of the activity is a high impact activity.

In the Aboriginal Heritage Regulations 2018, an activity area is defined as:

- *"the area or areas to be used or developed for an activity"* (r.5).

As such the activity area for a CHMP does not need to include the entire property, but rather the development footprint for an activity.

In considering the above, the following conclusions can be made for the subject site:

- The subject site encompasses the entire lot, however, the proposed development footprint or activity area is limited to the southern extent of the property.
- The development footprint is located outside the area CHS associated with the Brisbane Ranges National Park.
- While the property contains an area of CHS, the development footprint does not overlap with this area, with the development footprint located in the south of the property.

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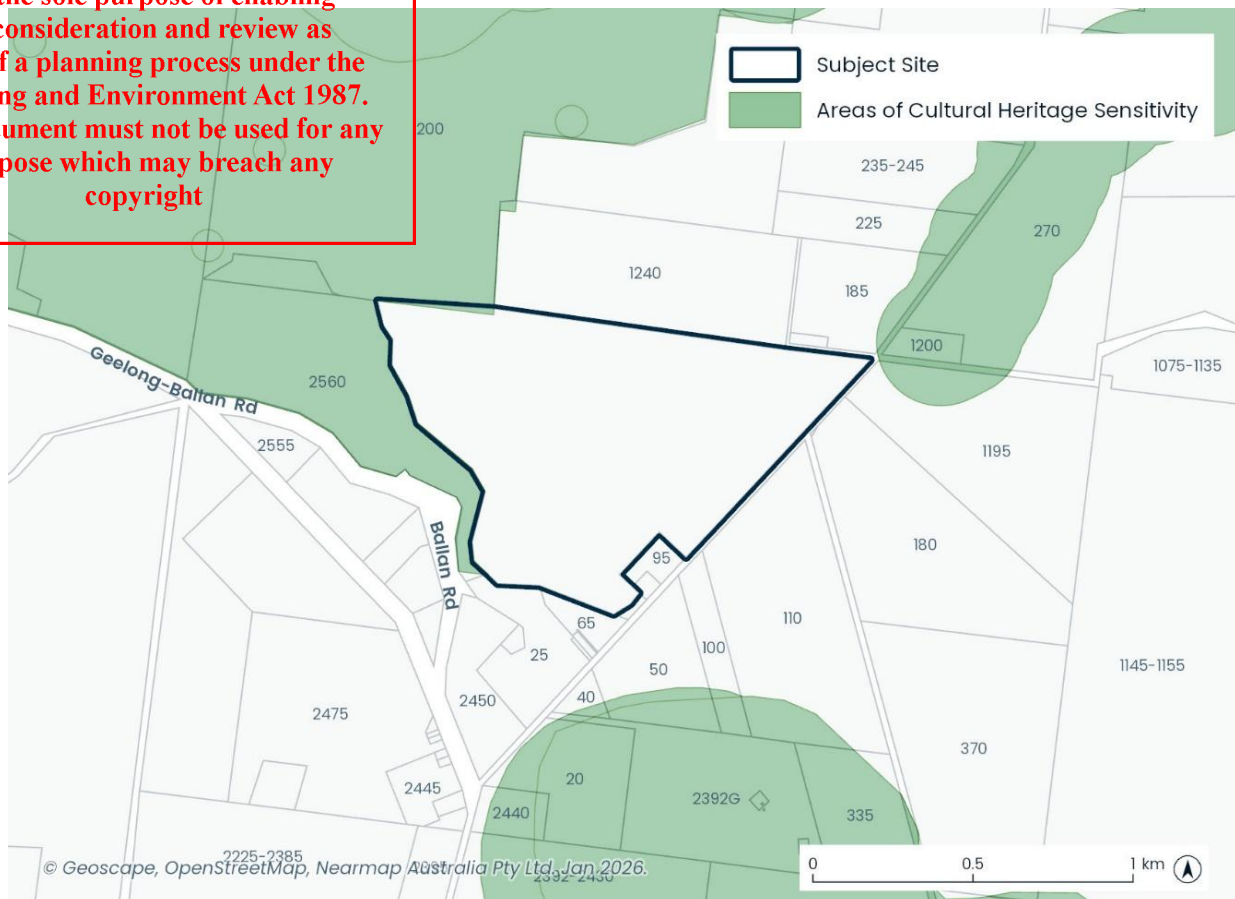


Figure 4: Location of the subject site and mapped areas of Cultural Heritage Sensitivity

4 Aboriginal Cultural Heritage

The subject site falls within the Wada Wurrung Traditional Owners Aboriginal Corporation (WTOAC), Registered Aboriginal Party (RAP) area. No consultation undertaken with the RAP has been undertaken as part of this investigation.

4.1.1 Previously Recorded Aboriginal Places

A search of the Victorian Aboriginal Heritage Register (VAHR) via the Aboriginal Cultural Heritage Register and Information System (ACHRIS), using the access code 16909, was conducted on 21 April 2026 by Monica Gregg (Consultant and Heritage Advisor, Urbis).

The purpose of this search was to determine the extent and nature of Aboriginal cultural heritage previously identified within and nearby the subject site. The search found:

- No registered Aboriginal Places are located within the subject site, including the proposed activity area.
- The nearest registered Aboriginal Place is an artefact scatter (VAHR 7722-0005 Anakie Hills) which is located approximately 310 m south of the subject site.
- There have been no targeted assessments of the subject site.

4.2 Aerial Image Review

A review of the history of the subject site provides important information regarding disturbance and archaeological potential. This section reviews the applicable impacts within the region, providing insights into how past developments have shaped the present environment.

- Aerial imagery from 1931 and 2006 indicates the subject site was used for agricultural purposes (Figure 5 and Figure 6).
- Imagery from 2006 shows a dam constructed in the centre of the subject site as well as one along the eastern boundary (Figure 6).
- Imagery dating to 2026 show development to have occurred in the south of the subject site, which consists of education facilities (Figure 7).
- The subject site has been subject to minimal development over time, remaining predominantly agricultural in use.
- This suggests the subject site is an agricultural parcel and not part of the Brisbane Ranges National Park

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Figure 5: Aerial imagery of the subject site dating to 1931 (Source: Historical Aerial Photography, Commonwealth of Australia (Geoscience Australia))



Figure 6: Aerial imagery of the subject site dating to 2006 (Source: NearMap)

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Figure 7. Aerial imagery of the subject site dating to 2026 (Source: NearMap)

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5 Conclusions and Recommendations

This Aboriginal Cultural Heritage Letter of Advice (LoA) concludes that:

- The subject site is impacted by a mapped area of cultural heritage sensitivity under r.(32)(1)(2).
- The proposed activity is considered to be a high impact activity under r.46(1)(a)(b)(viii).
 - However, the proposed activity does not impact the area of cultural heritage sensitivity.
- The nearest Aboriginal Place is 310 m south of the subject site.
- As shown through aerial imagery, the subject site has been used predominantly for agriculture since c.1931. Development on the site has been restricted to the Bacchus Marsh Grammar facilities in the south of the property constructed from 2017.
- A CHMP is not triggered by the proposed works in the development footprint.

Urbis recommends the following:

Recommendation 1 – No Mandatory CHMP

Although the subject site contains and an area of cultural heritage sensitivity, the proposed activity area/development footprint is restricted to an area south of the CHS area and does not intersect.

A mandatory CHMP is **not** required by the proposed works in the activity area/development footprint.

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