

Cooma Future Subdivision Development Project:

Precinct 2 (Lot 2 and 4 in DP 1285072) &
Precinct 3 (Lot 3 in DP 1285072) Polo Flat Rd,
Cooma NSW

Due Dilligence Assessment

Report to:

New South Wales Aboriginal Land Council

Final-October 2022



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Cooma Due Diligence

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129 -163

Local Government Area

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EXECUTIVE SUMMARY

Lantern Heritage have been commissioned by the New South Wales Aboriginal Land Council to undertake a due diligence assessment as part of preparations for a development application (DA) for subdivisions of land at Polo Flat Road, Cooma, NSW. The Site is shown below (Figure 1) with Precinct 2 (defined as Lot 2 and 4 in DP 1285072) and Precinct 3 (defined as Lot 3 DP 1285072) being the two land parcels requiring the Aboriginal Heritage Advice and assessment. The scope will also include any areas or corridors required for road widening and or lead-in servicing:

This Due Diligence assessment is designed to determine whether the proposed activity is likely to result in harm, or impacts, to Aboriginal cultural heritage.

This report documents the due diligence process that has been undertaken with respect to the scope of works provided by New South Wales Aboriginal Land Council. It has been prepared in accordance with the Heritage, NSW Department of Premier and Cabinet (Heritage NSW – formerly DECCW) Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (Department of Environment, Climate Change and Water, 2010a). This report has been compiled in accordance with the Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance (Australia ICOMOS, 2013).

The steps involved in the due diligence process are outlined in Figure 2. The result of Step 1 of the due diligence process was that the proposed activity is likely to cause ground disturbance. As such it was necessary to proceed to Step 2 of the due diligence process.

The result of Step 2 of the due diligence process was that the proposed activity area corresponds to landscape features that may contain Aboriginal objects (low ridgeline overlooking alluvial environment). As such it was necessary to proceed to Step 3 of the due diligence process.

Step 3 of the due diligence process determined that it is unlikely that harm can feasibly be avoided to all landscape features likely to indicate the presence of Aboriginal objects. As such it was necessary to proceed to Step 4 of the due diligence process.

Desktop assessment and predictive model

The desktop component of Step 4 concluded that, there are no known Aboriginal sites within the proposed activity area. However, it was also predicted that the low hill in the activity area corresponds to a landform with:

- moderate potential for stone artefact scatters;
- low potential for intact subsurface archaeological deposits;
- low potential for burials, and
- low potential for other site types such as stone arrangements, ceremonial sites, hearths.

Visual assessment and field survey

Visual inspection of Precincts 2 and 3 was conducted on 07/04/2022 by Clive Freeman and Peter Markovicz, Lantern Heritage Pty Ltd, in partnership with representatives from Merriman's LALC.

The visual inspection involved a pedestrian survey along the entire area of the proposed subdivision. Areas of ground exposure within and adjacent to the proposed activity area were sought out, but survey visibility was less than 10% due to thick vegetation throughout all of the study area, except the very top of the low hill. This made visual assessment of the study area extremely difficult and representatives from Merriman's LALC suggested that, by conducting a cultural burn of the vegetation in this area, they could improve visibility, allowing for a more effective survey in advance of development.

Because of environmental legislation, a cultural burn was rendered impractical. Instead, a number of 5 m by 5 m areas of vegetation were slashed, to allow better survey coverage of the study area. A second visual inspection of Precincts 2 and 3 was conducted on 25/08/2022 by Conor McAdams and Christine Gant-Thompson, in partnership with representatives from Merrimans LALC.

Across much of the study area, visibility remained < 10%, due to the fine grass which obscured the ground surface even after slashing. While this impacted survey coverage to an extent, across much of the site soils were found to be the thin, rocky soils that are typical of slopes in this region. No artefacts were found during the survey and, combined with the exposures that were provided by erosive features, slashing and vehicle tracks, the study area can be understood as having low-moderate archaeological potential, with some areas of thin, rocky soil on the slopes having very low archaeological potential, due to the extent of their erosion.

The deposit of colluvial material at the base of the low hill in Precinct 3 (Survey Unit 4) is the highest potential area that was detected within the study area. Glenn Campbell from Merriman's LALC has indicated that, although desktop and visual assessment indicate a relatively low chance of disturbing archaeological material in this area, he has found Aboriginal cultural material in similar settings within the Cooma area. Merriman's LALC have suggested having a representative monitoring the portions of the work that disturb ground in this area as a way of mitigating any potential damage to Aboriginal cultural heritage values.

Summary and Recommendations

On the basis of this due diligence assessment, the archaeological potential of the study area is low-moderate, with some areas of very low archaeological potential found on the eroded soils of the hill slopes. Based on the results of our survey, proposed works at Polo Flat Road, Cooma, are unlikely to harm Aboriginal artefacts. But the colluvial deposit at the base of the slope in Precinct 3 retains the highest archaeological potential of any portion of the study area and representatives from Merriman's LALC believe there is some potential to harm Aboriginal artefacts in this area.

Representatives from Merriman's LALC have proposed having a representative monitoring ground disturbing activities in the area of the colluvial deposit at the base of the slope in Precinct 3, as a way of mitigating any potential harm to Aboriginal cultural heritage values.

The following recommendations have been formulated on the basis of the desktop review and visual assessment documented above:

- a) Proposed works across the study area, in both Precinct 2 and Precinct 3, may proceed with caution.
- b) Monitoring should be carried out by a representative of Merriman's LALC, during works that disturb the ground surface in the area of the colluvial deposit at the base of the slope in Precinct 3, as a way of mitigating any potential harm to Aboriginal cultural heritage values.
- c) This due diligence assessment only covers the works outlined in section 2 of this report. If additional impacts or alternative alignments are proposed, further assessment will be required.
- d) A copy of this report, and any subsequent due diligence investigations, should be kept on record, and if requested, supplied to the relevant government agency as proof of compliance with the *Due Diligence Code of Practice*.

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1 PROJECT OVERVIEW

1.1 Introduction

Lantern Heritage have been commissioned by the New South Wales Aboriginal Land Council to undertake a due diligence assessment as part of preparations for a development application (DA) for subdivisions of land at Polo Flat Road, Cooma, NSW. The Site is shown below (Figure 1) with Precinct 2 (defined as Lot 2 and 4 in DP 1285072) and Precinct 3 (defined as Lot 3 in DP 1285072) being the two land parcels requiring the Aboriginal Heritage Advice and assessment. The scope will also include any areas or corridors required for road widening and or lead-in servicing:

This report documents the due diligence process that has been undertaken, with respect to the work proposed for the future subdivision development on that land. It has been prepared in accordance with the NSW Office of Environment and Heritage *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water, 2010a). This report has been compiled in accordance with the *Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (Australia ICOMOS, 2013).

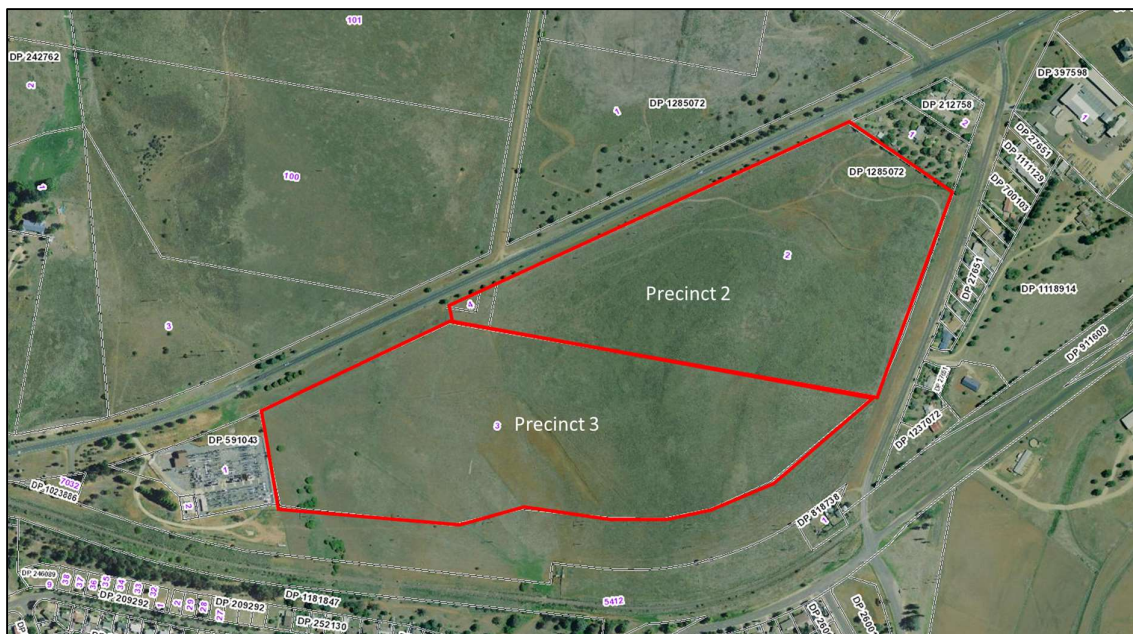


Figure 1: Site plan showing precincts that will be included in Development Application (DA) at Polo Flat Road, Cooma, NSW.

1.2 Legislative Framework

1.2.1 National Parks and Wildlife Act 1974

The *National Parks and Wildlife Act 1974* (as amended), administered by the Office of Environment and Heritage (OEH), is the primary legislation for the protection of Aboriginal cultural heritage in New South Wales. Part 6 of the NPW Act provides specific protection for Aboriginal objects and declared Aboriginal places by establishing offences of harm.

Table 1 summarises those offences and their associated penalties. However, if due diligence is exercised, this is a defence against prosecution for the strict liability offence, in the event that an Aboriginal object is later unknowingly harmed without an Aboriginal Heritage Impact Permit (AHIP).

Table 1: Offences and penalties for harming or desecrating Aboriginal objects and declared Aboriginal Places (DECCW 2010b)

Offence	Maximum Penalty: Individual	Maximum Penalty: Corporation
A person must not harm or desecrate an Aboriginal object that the person knows is an Aboriginal object.	2,500 penalty units (\$275,000) or imprisonment for 1 year 5,000 penalty units (\$550,000) or imprisonment for 2 years or both (in circumstances of aggravation)	10,000 penalty units (\$1,100,000)
A person must not harm or desecrate an Aboriginal object (strict liability offence).	500 penalty units (\$55,000) 1,000 penalty units (\$110,000) (in circumstances of aggravation)	2,000 penalty units (\$220,000)
A person must not harm or desecrate an Aboriginal Place (strict liability offence).	5,000 penalty units (\$550,000) or imprisonment for 2 years or both	10,000 penalty units (\$1,100,000)
Failure to notify DECCW of the location of an Aboriginal object (existing offence and penalty)	100 penalty units (\$11,000). For continuing offences a further maximum penalty of 10 penalty units (\$1,100) applies for each day the offence continues.	200 penalty units (\$22,000). For continuing offences a further maximum penalty of 20 penalty units (\$2,200) applies for each day the offence continues

Contravention of any condition of an Aboriginal Heritage Impact Permit	1,000 penalty units (\$110,000) or imprisonment for 6 months, or both, and in the case of a continuing offence a further penalty of 100 penalty units (\$11,000) for each day the offence continues	2,000 penalty units (\$220,000) and in the case of a continuing offence a further penalty of 200 penalty units (\$22,000) for each day the offence continues
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1.2.2 Due Diligence Code of Practice

The *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW, 2010a) details the process that needs to be implemented in order to determine whether or not proposed activities may harm Aboriginal objects. The following is an excerpt from the *Due Diligence Code of Practice* (DECCW, 2010a) that outlines the purpose of the code.

The *National Parks and Wildlife Act 1974* (NPW Act) provides that a person who exercises due diligence in determining that their actions will not harm Aboriginal objects has a defence against prosecution for the strict liability offence if they later unknowingly harm an object without an AHIP.

The NPW Act allows for a generic code of practice to explain what due diligence means. Carefully following this code of practice, which is adopted by the National Parks and Wildlife Regulation 2009 (NPW Regulation) made under the NPW Act, would be regarded as 'due diligence'. This code of practice can be used for all activities across all environments.

This code sets out the reasonable and practicable steps which individuals and organisations need to take in order to:

1. identify whether or not Aboriginal objects are, or are likely to be, present in an area;
2. determine whether or not their activities are likely to harm Aboriginal objects (if present), and
3. determine whether an AHIP application is required.

If Aboriginal objects are present or likely to be present **and** an activity will harm those objects, then an AHIP application will be required.

By following the *Due Diligence Code of Practice* proponents can reach a reasonable determination as to whether or not Aboriginal objects will be harmed by their proposed activity, whether further investigation is warranted and whether or not an AHIP will be required.

1.2.3 Aboriginal Consultation

Consultation with the Aboriginal Community is not formally required as part of the due diligence process. The decision as to whether or not to implement consultation as part of the due diligence process lies with the proponent. However, if at any point an application is made for an AHIP, then the consultation must be undertaken in accordance with the requirements in cl.80C of the *National Parks and Wildlife Regulation 2009*.

1.3 Due Diligence Process

The due diligence process comprises up to five separate steps that will determine whether or not an AHIP is required for a given activity. Figure 2 provides an overview of the due diligence process. Additional details regarding each step are outlined below.

1.3.1 Step 1: Will the activity disturb the ground surface?

The first step in the due diligence process is to determine whether the proposed activity will disturb the ground surface or any culturally modified trees. Essentially, if there will be ground disturbance (e.g. digging, grading, bulldozing, scraping, ploughing or drilling), or if mature vegetation will be removed, then the potential exists for harm to Aboriginal objects, so the next step in the due diligence process should be implemented.

However, if the proposed activity will not disturb the ground surface or any culturally modified trees, then the activity can go ahead, with caution, without applying for an AHIP.

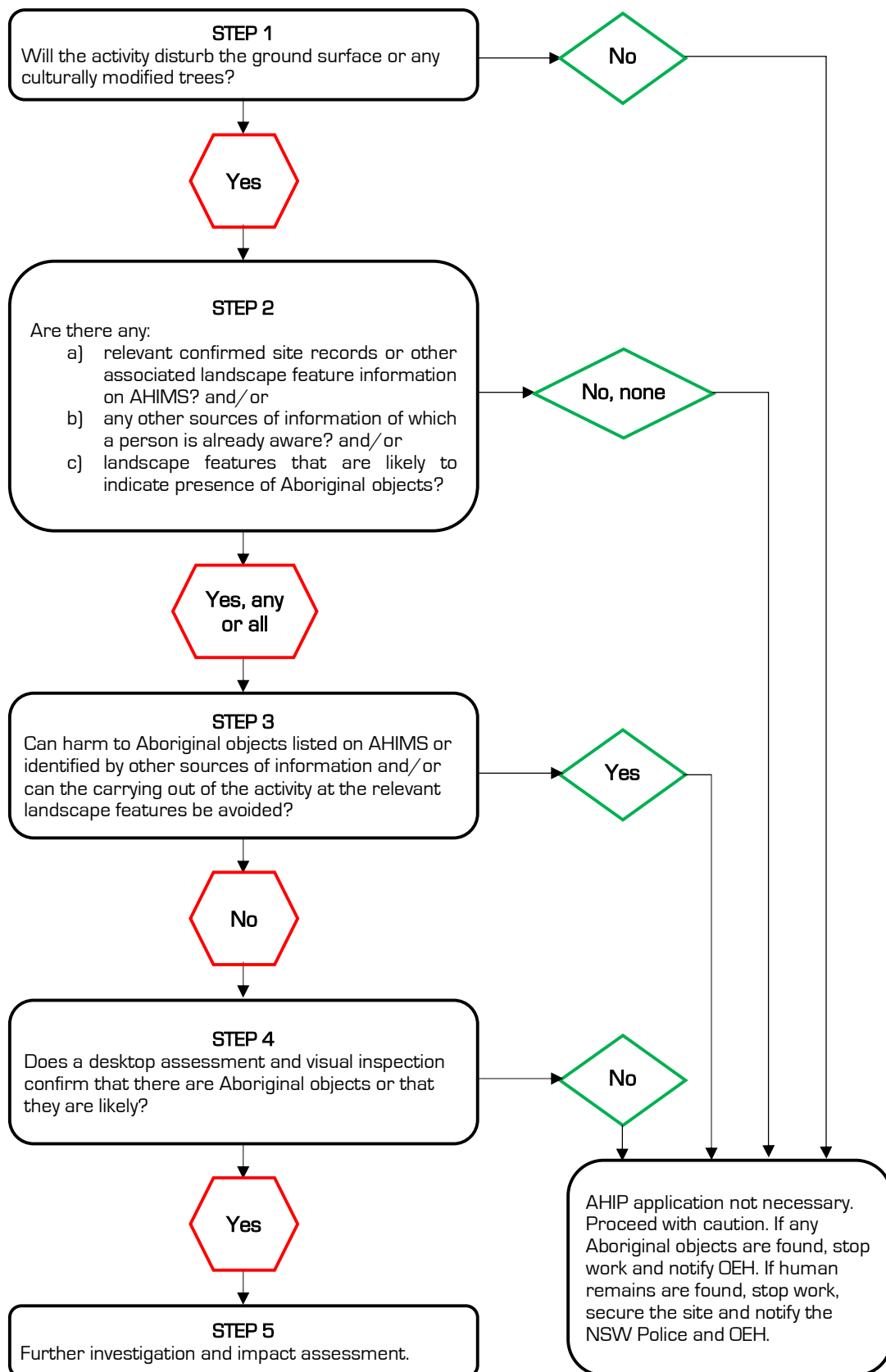


Figure 2: The generic due diligence process [DECCW, 2010a].

1.3.2 Step 2: Are there previously recorded sites, or landscape features likely to indicate presence of Aboriginal objects?

There are two components to the second step in the due diligence process:

- a) determining if there are previously recorded sites in the activity area, and
- b) determining if the activity area includes landscape features that are likely to indicate the presence of Aboriginal objects.

The first component of this step involves searching the OEH Aboriginal Heritage Information Management System (AHIMS) to check for the presence of previously registered sites within the activity area. It also involves checking for whether or not previous studies have been conducted across the activity area, or part thereof. If there are previous investigations, then it is also necessary to check whether or not those investigations identified any Aboriginal objects, or the potential for such objects within the proposed activity area.

Regardless of the outcome of the searches for previously recorded Aboriginal objects, it is also necessary to review the landscape features present within the activity area, and assess whether or not Aboriginal objects are likely to be present within those features.

If the proposed activity is:

- within 200m of any part of: any river, stream, lake, lagoon, swamp, wetlands, natural watercourse, tidal waters (including the sea), or
- located within a sand dune system, or
- located on a ridge top, ridge line or headland, or
- located within 200m below or above a cliff face, or
- within 20m of or in a cave, rock shelter, or a cave mouth; and
- is on land that is not disturbed¹, then the next step in the due diligence process **must** be implemented.

However, if after completing a search of AHIMS, a review of previous investigations and a review of the landscape features in the activity area, it is concluded that there are no known Aboriginal objects and no landscape features likely to indicate the presence of Aboriginal objects, then the activity can go ahead, with caution, without applying for an AHIP.

1.3.3 Step 3: Can harm be avoided to the object or disturbance of the landscape feature?

The third step in the due diligence process is implemented when there are known Aboriginal objects present in the activity area, and/or the activity area includes landscape features likely to indicate the presence of Aboriginal objects, on land that is not disturbed. This step involves an assessment of whether or not the activity area can be modified to avoid harm to

¹ Land is disturbed if it has been the subject of a human activity that has changed the land's surface, being changes that remain clear and observable.

known Aboriginal objects and/or landscape features likely to indicate the presence of Aboriginal objects.

For example, harm may be avoided through reducing the extent of the activity area, relocating the activity area, or modifying the proposed activity to avoid ground disturbance or vegetation removal.

If the activity cannot be modified in such a way as to avoid **all** harm to known Aboriginal objects and **all** disturbance to landscape features likely to indicate the presence of Aboriginal objects, then the next step in the due diligence process **must** be implemented.

However, if harm can be avoided to **all** known Aboriginal objects and landscape features likely to indicate the presence of Aboriginal objects, then the activity can go ahead, with caution, without applying for an AHIP.

1.3.4 Step 4: Desktop assessment and visual inspection

The fourth step in the due diligence process is implemented when harm cannot be avoided to known Aboriginal objects and/or disturbance to landscape features likely to indicate the presence of Aboriginal objects. This step involves a desktop assessment and a visual inspection of the activity area.

The desktop assessment involves collation and review of any readily available information from previous cultural heritage studies, archaeological investigations and previously recorded Aboriginal sites across the broader area. It must include the proposed activity as a whole, not just particular areas where Aboriginal objects have been recorded or areas where landscape features, likely to indicate the presence of Aboriginal objects, are located.

Visual inspection must also be conducted in order to determine if Aboriginal objects can be identified within the activity area, or if they are likely to be present below the surface. The visual inspection must be done by a person with expertise in locating and identifying Aboriginal objects (e.g. a consultant with appropriate qualifications and training).

If the desktop assessment or the visual inspection identifies the presence of Aboriginal objects in the activity area, **or** the likelihood of Aboriginal objects being present, more detailed investigation and impact assessment will be required. In which case, the next step in the due diligence process **must** be implemented.

However, if the desktop assessment and the visual assessment do not identify the presence, or likely presence, of Aboriginal objects, then the activity can go ahead, with caution, without applying for an AHIP.

1.3.5 Step 5: Further investigations and impact assessment

The fifth step in the due diligence process is the implementation of a detailed investigation and impact assessment. This step is implemented when the desktop assessment and visual investigation confirm the presence, or likely presence, of Aboriginal objects within the proposed activity area.

Detailed investigation and impact assessment must be conducted in accordance with OEH guidelines regarding archaeological investigations (DECCW, 2010b) and the process of

investigating and reporting on Aboriginal cultural heritage (Office of Environment and Heritage, 2011).

If the detailed investigation and impact assessment determines that harm will occur to Aboriginal objects, then an AHIP application **must** be made.

All AHIP applicants **must** undertake Aboriginal community consultation in accordance with clause 80C of the NPW Regulation (DECCW, 2010c). Consultation may also be followed when a cultural heritage assessment is undertaken and there is uncertainty about potential harm.

1.3.6 If the due diligence process does not identify that an AHIP application is necessary

If after completing the due diligence code of practice process it has reasonably been determined that an AHIP application is not necessary, because Aboriginal objects are not present or, if they are present, harm to those objects can be avoided, then the activity can go ahead with caution.

However, if an Aboriginal object is found while undertaking the activity, work **must** stop and OEHS **must** be notified. In that instance, pending advice from OEHS, an AHIP may be required before work can resume. Further investigation may also be required, depending on the type of Aboriginal object that is found.

In the event that human skeletal remains are found during the activity, work **must** stop immediately, the area **must** be secured, and the NSW Police and OEHS **must** be notified.

As summarised in Table 1, if an Aboriginal object is found that is not already recorded on AHIMS, there is a legal obligation under s.89A of the NPW Act to notify OEHS as soon as possible of the object's location. This applies to all people in all situations, including when following the due diligence code of practice.

2 STEP 1 – WHAT IS THE PROPOSED ACTIVITY?

2.1 Overview of the proposed activity

The State of NSW is proposing a land subdivision on Polo Flat Rd to increase housing opportunities within the Cooma area. As a result of this plan LAHC have sought Aboriginal Heritage advice to support a future subdivision development application on land on Polo Flat Rd, Cooma, NSW.

The project site is shown below with Precincts 2 and 3 being the two land parcels requiring the Aboriginal Heritage Advice and assessment. The scope will also include any areas or corridors required for road widening and or lead-in servicing.

The proposed development of both sites (Lots 2 and 3) will be in accordance with the relevant development consent for the subdivision of the land.

The activities to be undertaken include but not limited to are:

- Site serviceability due diligence
- Developable area investigations
- Civil design
- Urban design
- Earthworks
- Roadwork design
- Stormwater systems
- Stormwater management
- Sewerage systems
- Water reticulation
- Inspections of contractors work during construction
- Subdivision certificate and registration of individual titles

2.2 Will the proposed activity disturb the ground surface?

As outlined above, the proposed works will involve a large degree of ground disturbance and/or land surface modification within Precincts 2 & 3.

2.3 Step 1 Summary

The result of Step 1 of the due diligence process is that the proposed activity is likely to cause ground disturbance. As such it is necessary to proceed to Step 2 of the due diligence process.

3 STEP 2 – REVIEW OF HERITAGE REGISTERS AND LANDSCAPE FEATURES

3.1 AHIMS site search

An extensive site search was conducted via AHIMS on the 13/04/22 (AHIMS Search # 675525), covering following area: GDA Zone 55, Easting: 680000.0-705000.0, Northings: 5970000.0 - 6010000.0.

One Hundred & four (104) sites or objects were listed as being present within the search area and one Aboriginal Place (Table 2; **Error! Reference source not found.**). Two of the sites (AHIMS#62-2-0336 and AHIMS#62-2-0350) are restricted, which means the cultural information associated with them is considered too sensitive to include on the AHIMS database by Aboriginal community members. Table 2 provides a list of the 102 unrestricted sites present in the search area, including site names and features, while

provides an overview of frequency of site types. The majority (77) of the sites are open camp sites (artefact scatters) and a further 11 are isolated artefacts. Only one site with PAD was found, due to the eroded nature of soils in this hilly environment. A variety of other site types, however, exists in this area, including quarries (7), resource and gathering sites (1), hearth (1) and ceremonial sites (4).

Table 2: Summary of AHIMS search results

AHIMS #	Site Name	Site Type/Features
62-2-0354	The River 3 and PAD (TR3)	Open Camp Site
62-2-0352	The River (TR1)	Isolated Find
62-2-0402	Bidgee Road 1	Open Camp Site
62-2-0398	Meroo	Aboriginal Resource and Gathering
62-2-0365	KA 2 (Kiah Avenue 2)	Isolated Find
62-2-0231	Cooma Sewerage 2	Open Camp Site
62-2-0214	Cooma Sewerage 1	Open Camp Site
62-2-0384	Harnett 12	Open Camp Site
62-2-0381	Harnett 5	Open Camp Site
62-2-0336	Restriction applied. ²	
62-2-0038	Ch 3;	Open Camp Site
62-2-0288	MOULD 2;	Open Camp Site
62-2-0413	Cooma Transmission Line Isolated Find 1 (CTL IF1)	Open Camp Site
62-2-0369	CBCA 4 (Comma Back Creek 4)	Open Camp Site
62-2-0213	Cooma Sewerage 1	Open Camp Site
62-2-0400	Doghead Ridge	Aboriginal Ceremony and Dreaming
62-2-0397	Mullian Range North Ridge Fire Site	Hearth
62-2-0374	Church Hill SU1	Open Camp Site
62-2-0386	Church Hill SU1 North Cooma	Open Camp Site
62-2-0238	EGP 2-28	Open Camp Site

² Please contact ahims@environment.nsw.gov.au

AHIMS #	Site Name	Site Type/Features
62-2-0372	Hartnett 1	Open Camp Site
62-2-0373	Hartnett 2	Open Camp Site
62-2-0030	Bunyon To Cowra Creek 7	Quarry
62-2-0012	RC6 Numeralla River	Open Camp Site
62-2-0287	Mould 1	Open Camp Site
62-2-0043	Ch 10	Open Camp Site
62-2-0353	The River 2 (TR2)	Open Camp Site
62-2-0368	CBCA 3 (Comma Back Creek 3)	Open Camp Site
62-2-0348	Shelton	Isolated Find
62-2-0232	Cooma Sewerage 3	Open Camp Site
62-2-0045	Old Schoolhouse	Open Camp Site
62-2-0327	Lambie Gorge 1	Open Camp Site/PAD
62-2-0242	EGP 2-32	Open Camp Site
62-2-0244	EGP 2-34	Quarry
62-2-0240	EGP 2-30	Quarry
62-2-0321	MER1	Open Camp Site
62-2-0032	Bunyan 10 Cowra Creek 1	Open Camp Site
62-2-0379	Harnett 11	Open Camp Site
62-2-0022	Bunyan	Open Camp Site
62-2-0026	Bunyan To Cowra Creek 3	Quarry
62-2-0035	Chakola Quarry;Sunny Side	Quarry
62-2-0286	Dodds Ck	Open Camp Site
62-2-0040	Ch 5	Open Camp Site
62-2-0008	RC2 Numeralla River	Open Camp Site
62-2-0042	Ch 7	Open Camp Site
62-2-0356	The River 5 (TR5)	Isolated Find
62-2-0403	Bidgee Road 2	Open Camp Site
62-2-0370	CBCA 5 (Comma Back Creek 5)	Open Camp Site
62-2-0334	MR1 (Cooma)	Open Camp Site
62-2-0243	EGP 2-33	Open Camp Site
62-5-0104	MER.3	Isolated Find
62-2-0385	Harnett 13	Open Camp Site
62-2-0002	Rock Flat;Avoca	Open Camp Site
62-2-0339	Cooma Wind Farm 2 - (CWF2)	Open Camp Site
62-2-0037	Ch 2;Hill To	Open Camp Site
62-2-0236	EGP 2-26	Open Camp Site
62-2-0044	Ch 11	Open Camp Site
62-2-0039	Ch 4	Open Camp Site
62-2-0041	Ch 6	Open Camp Site
62-2-0006	Muddah Lake	Open Camp Site
62-2-0399	Mt Gladstone	Aboriginal Ceremony and Dreaming
62-2-0364	KA 1 (Kiah Avenue 1)	Open Camp Site
62-2-0396	North Ridge	Aboriginal Ceremony and Dreaming
62-2-0335	Murrells Crossing	Open Camp Site
62-2-0239	EGP 2-29	Open Camp Site
62-2-0377	Harnett 8	Isolated Find

AHIMS #	Site Name	Site Type/Features
62-2-0375	Harnett 3	Open Camp Site
62-2-0028	Bunyan To Cowra Creek 5	Open Camp Site
62-2-0047	none	Open Camp Site
62-2-0013	RC7	Open Camp Site
62-2-0355	The River 4 and PAD (TR4)	Open Camp Site
62-2-0001	Cooma Creek	Open Camp Site
62-2-0237	EGP 2-27	Open Camp Site
62-2-0380	Harnett 4	Open Camp Site
62-2-0376	Harnett 7	Open Camp Site
62-2-0378	Harnett 9	Open Camp Site
62-2-0323	EGP,2-31	Open Camp Site
62-2-0383	Harnett 10	Open Camp Site
62-2-0433	RFQ1	Open Camp Site
62-2-0027	Bunyan To Cowra Creek 4	Quarry
62-2-0031	Bunyan To Cowra Creek 2	Open Camp Site
62-2-0007	RC1 Numeralla River	Open Camp Site
62-2-0289	MOULD 3	Isolated Find
62-2-0367	CBCA 2 (Comma Back Creek 2)	Open Camp Site
62-2-0371	Cooma Back Creek	Open Camp Site
62-2-0401	Lambie Gorge	Aboriginal Ceremony and Dreaming
62-2-0337	C 1	Isolated Find
62-2-0382	Harnett 6	Open Camp Site
44-4-0265	MER2	Open Camp Site
62-2-0241	EGP 2-31	Open Camp Site
62-2-0434	RFQ2	Isolated Find
62-2-0036	Spring Downs Quarry;Spring Downs	Quarry
62-2-0034	Ch 1;Sunny Side	Open Camp Site
62-2-0029	Bunyan To Cowra Creek 6	Open Camp Site
62-2-0350	Restriction applied. ³	
62-2-0010	RC4 Numeralla River	Open Camp Site
62-2-0366	CBCA 1 (Comma Back Creek 1)	Open Camp Site
62-2-0428	Cooma Transmission Line Artefact Scatter 2 (CTL AS2)	Open Camp Site
62-2-0351	Shelton-a	Open Camp Site
62-2-0009	RC3 Numeralla River	Open Camp Site
62-2-0046	none	Open Camp Site
62-2-0290	MOULD 4	Isolated Find
62-2-0011	RC5 Numeralla River	Open Camp Site
62-2-0338	Cooma Wind Farm 1	Isolated Find

³ Please contact ahims@environment.nsw.gov.au.

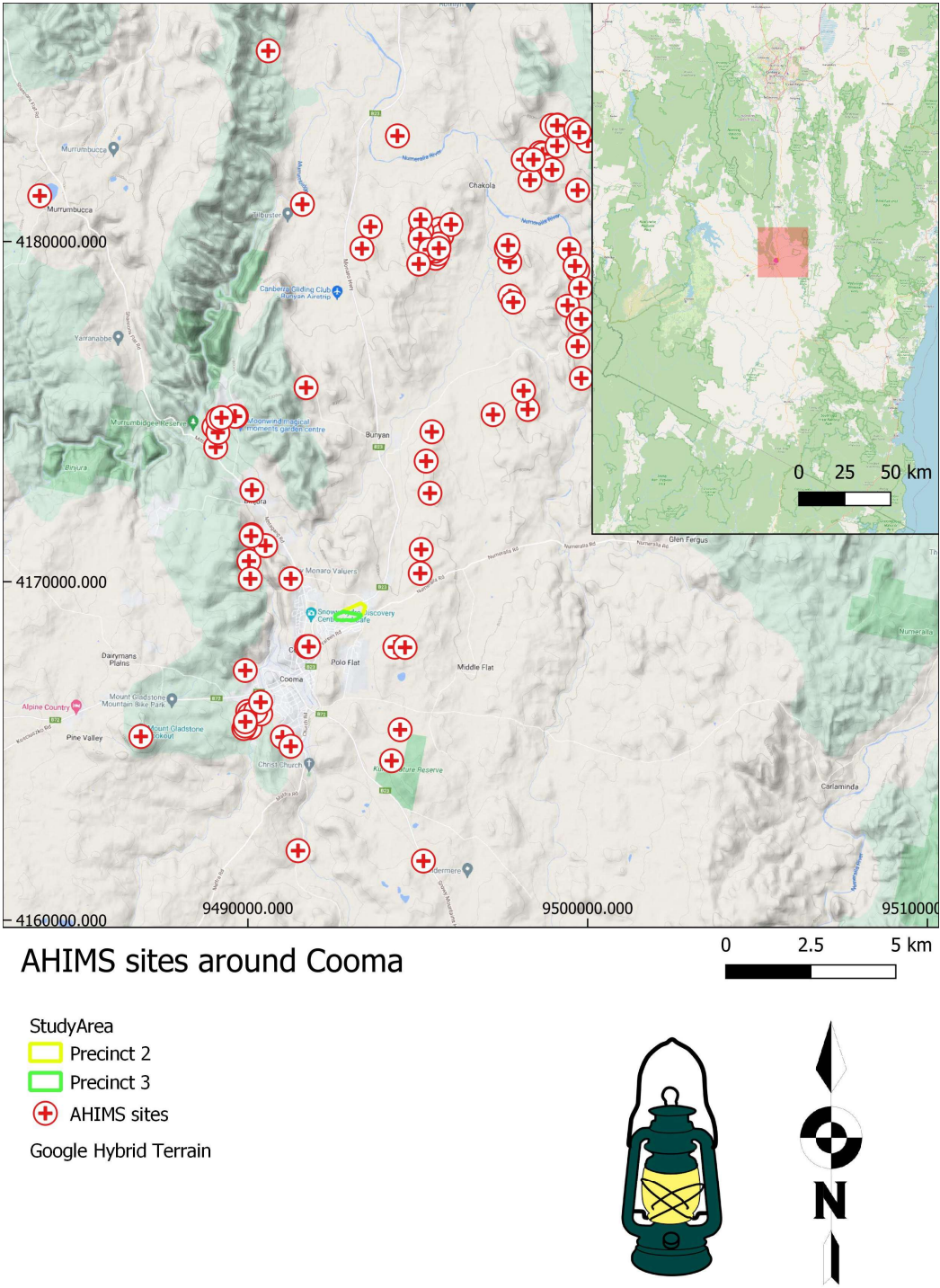


Figure 3: AHIMS sites plotted on a terrain map to show correlation between occupation and permanent water to the north of the study area, and occupation and higher ground on valley sides to the east and west

Table 3: Overview of previously recorded site types within the AHIMS search area.

Site types	Total
Open Camp Site	77
Isolated Find	11
Quarry	7
Aboriginal Ceremony and Dreaming	4
Open Camp Site/PAD	1
Hearth	1
Aboriginal Resource and Gathering	1
Restricted	2
Total	104

3.2 NSW State Heritage Register and Inventory search

A search was made of the NSW State Heritage Register and State Heritage Inventory on 25th of May 2022. No Aboriginal places or places with identified Aboriginal cultural values are listed on either the State Heritage Register or the State Heritage Inventory within the proposed activity area.

3.3 Review of landscape features

The study area is situated at an elevation of approximately 800-840m AHD⁴. It comprised of a low, undulating ridgeline in the centre of the property which slopes gently downwards to the north (**Error! Reference source not found.**). In the southwest of the property this levels out to undulating land associated with an ephemeral watercourse (a minor tributary of the “mostly perennial” Cooma Creek that is a tributary of the Murrumbidgee; **Error! Reference source not found.**; Figure 4).

This area is part of a wider (Mitchell) landscape (Figure 5) called the Monaro Plains Basalts and Sands (Mitchell 2002). This landscape is characterised by extensive tablelands and rolling hills, formed on Tertiary basalts, with associated sub-basaltic sands and gravel of the pre-eruption land surface. The geology of the surrounding area is extremely complex (Figure 6), with a long history of volcanism and subsequent metamorphism related to the Lachlan Orogen. Substantial Tertiary and Quaternary sediment bodies are also present.

Elevation in the area ranges from 600 to 950m (Mitchell, 2002), with local relief of less than 100 m and relatively poorly developed dendritic drainage patterns (such as we see in the study area). This is a low rainfall (400-600 mm) environment with high frost frequency. Heavy red-brown to black sticky uniform clay soils are common, but lighter textured red brown loams and occasional yellow-brown texture-contrast soils are associated with exposed sands.

Plant communities form treeless grasslands, with a high proportion of exotic grasses and herbs. Wet tussock with sedges and rushes characterises poorly drained flats, with wallaby grass (*Austrodanthonia* sp.) at lower elevations (Mitchell, 2002).

⁴ Australian Height Datum

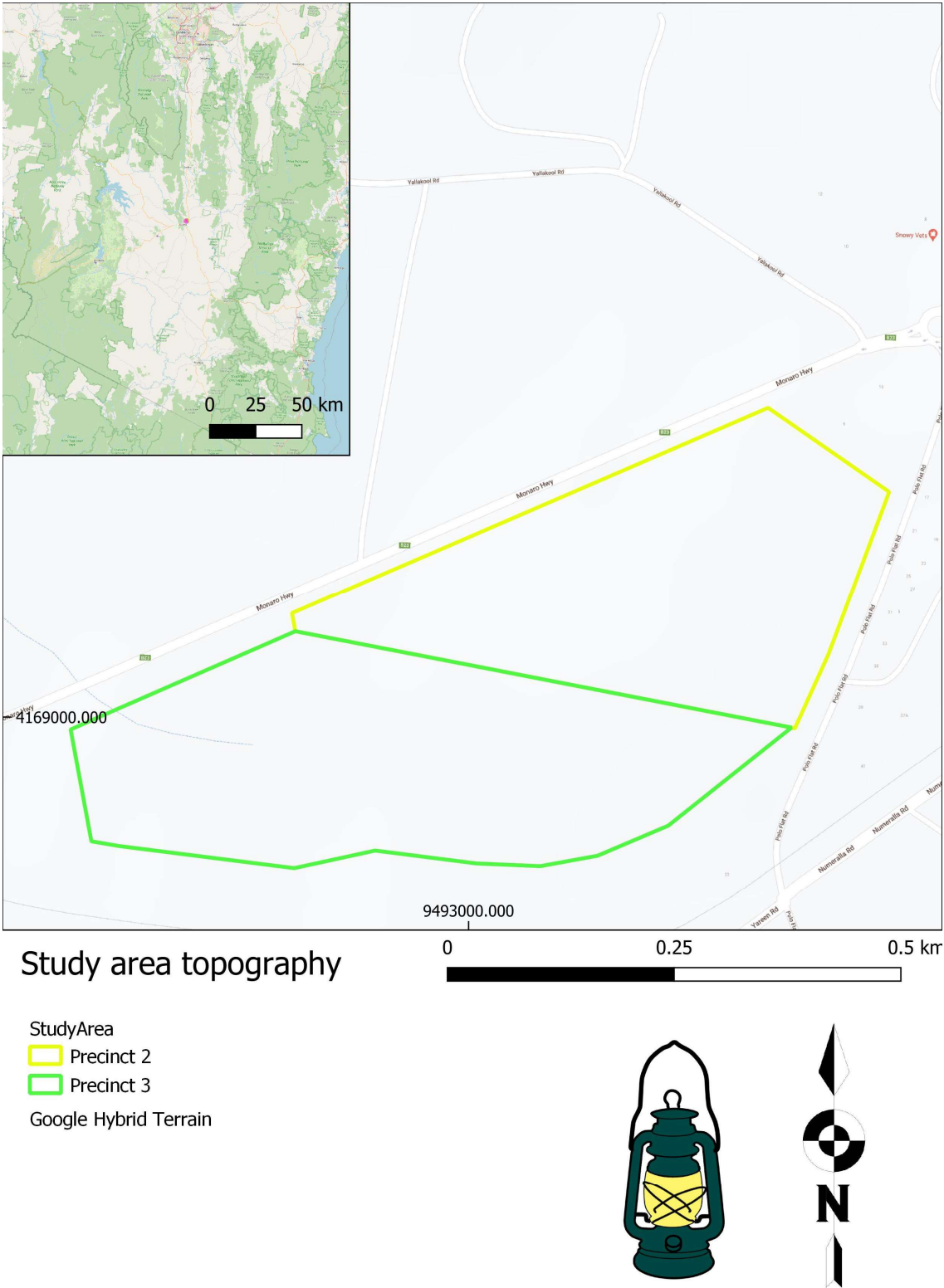


Figure 4: Topographic map of study area showing intermittent watercourse in southwest extent

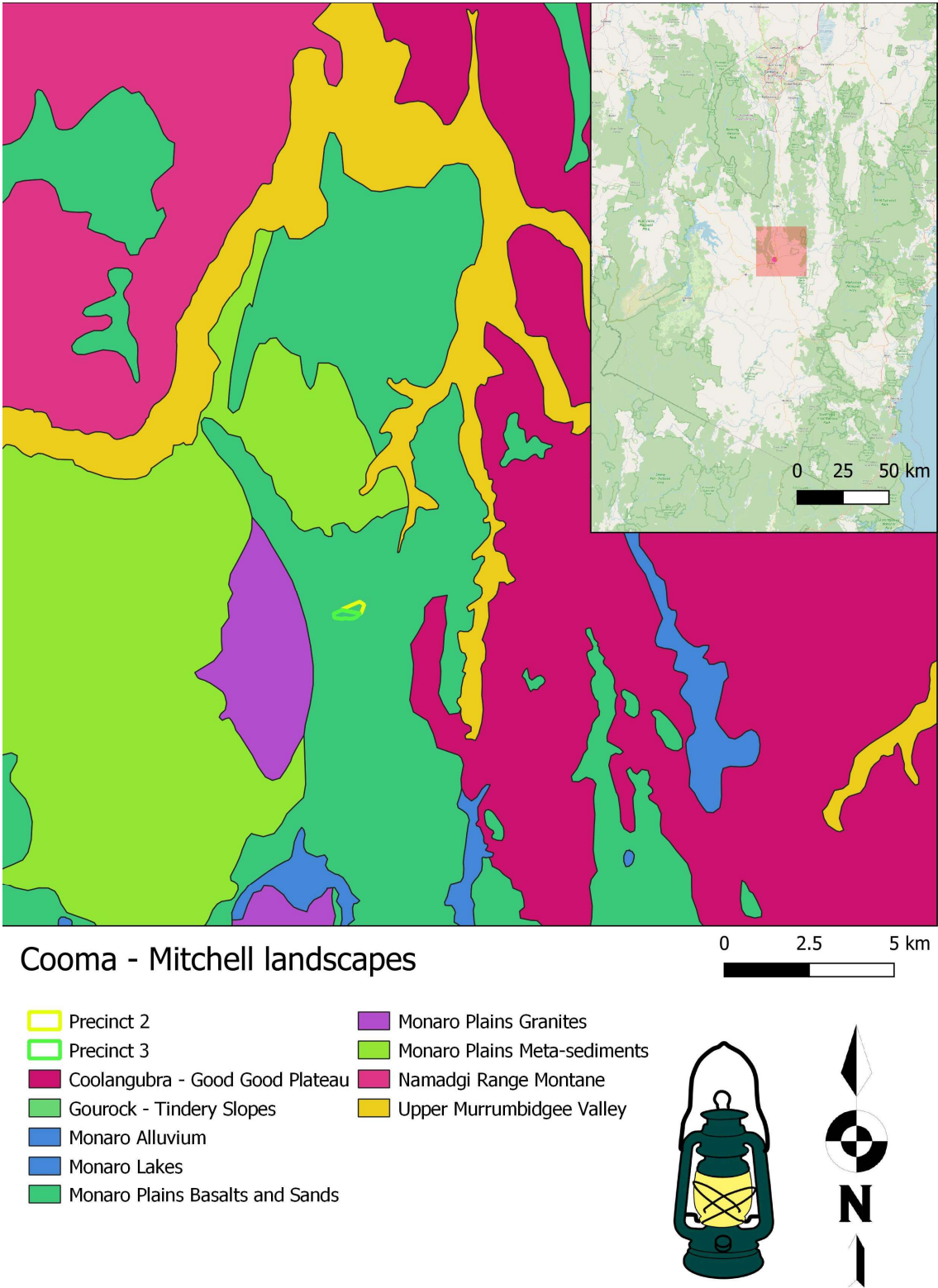


Figure 5: Mitchell Landscapes surrounding the study area



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3.4 Step 2 summary

There are no previously recorded sites listed within the proposed activity area. It is important to note that in the surrounding area, archaeological sites are more likely to be located on the higher ridgelines (**Error! Reference source not found.**). But it is impossible to rule out the presence of Aboriginal objects at this location on a landform basis. Furthermore, subsurface disturbance or land surface modification across the activity area is variable and includes areas of low to moderate prior disturbance.

The result of Step 2 of the due diligence process is that the proposed activity area may include areas of undisturbed land and the presence of Aboriginal objects cannot be ruled out. As such it is necessary to proceed to Step 3 of the due diligence process.

4 STEP 3 – CAN HARM BE AVOIDED?

Given the constraints regarding the proposed development, the nature of the topography and the environmental context across the proposed activity area, it does not appear that harm can feasibly be avoided to all landscape features that retain the possibility of containing of Aboriginal objects. As such it is necessary to proceed to Step 4 of the due diligence process.

5 STEP 4A – DESKTOP ASSESSMENT

The desktop component of the assessment includes a review of previous archaeological and cultural heritage investigations in the local region, together with reviews of the existing model of site location, and available mapping for the study area. The results of this review are then presented in terms of the implications for the proposed activity area.

5.1 Aboriginal occupation of Australia

Aboriginal occupation of Australia extends back well into the Pleistocene. Current theories place the arrival of humans to Sahul between 47,000 years before present (BP) and 65,000 BP (O'Connell and Allen 2004, 2015; Allen and O'Connell 2014; Clarkson et al., 2017, O'Connell et al., 2018). While debate continues regarding the earliest arrival in Australia, there is general agreement that all environmental zones across the continent were colonised by around 35,000 BP (Mulvaney and Kamminga 1999). Since that time there has been substantial climatic variation, which has influenced choices people made regarding the locations they lived.

5.2 Previous investigations of Aboriginal archaeology

The survey area falls within a region known as the Monaro tablelands and is situated within the southern highlands of NSW. It has been the subject of investigation for various academic research projects and cultural heritage management studies. The following summary highlights some of the relevant research findings within the local area, followed by a summary of research in and around Cooma.

Djekic (1982) An Archaeological survey of the route of the Cooma-Jindabyne 66kv transmission line – Final report to the NSW Parks and wildlife service and electricity commission of NSW AHIMS#282

This report details an archaeological survey of the route of the Cooma to Jindabyne 66kv electricity transmission line, which stretches across a significant portion of the Australian Alps, providing a sample of the types of environments that surround the study area. Construction of this line involved creation of a 30 m easement that would contain the wooden posts. Twelve sites located, consisting of 6 scarred trees and 6 lithic sites (only located due to recent ground exposures e.g. clearing/grading). Four of the lithic sites were located in the Snowy River/Jindabyne region. The results of this survey tend to support previous archaeological work that suggests the region was occupied late, and that occupation was concentrated in the river valley areas. The construction of the transmission line was not seen to pose a “major problem to the archaeology of the region.” The authors recommended that ground disturbance be kept to a minimum, particularly near water courses and stated that NPWS should be contacted if further archaeological remains were uncovered. They made a series of site specific suggestions, which included lopping the upper extent of scarred trees to avoid issues with electricity cables. The authors also collected an isolated artefact from Site 6.

Wellington (1992) Archaeological Survey of a proposed Crown Road at Chakola, Near Cooma, NSW. AHIMS #2372

This report details a survey carried out in advance of a crown road development, over a length of approximately 1.4 km at Chakola, near Cooma. This area is to the north of the current study, in the area of alluvial sediments associated with the Upper Murrumbidgee Mitchell Landscapes that surround Cooma Creek (Figure 5). One artefact scatter and one isolated find were found during the course of the survey, and it was determined that proposed works would destroy approximately 6% of the site, by area, but 25% of the estimated artefact assemblage, because development would directly impact the area of the site where artefact concentration is highest. It was stated that the sites moderate significance would only be partially impacted, thus the intrinsic values would be maintained. The author notes the evidence of erosion in the area, attributed to historical landuse, and explains the lack of subsurface deposits with reference to these factors. The recommendations included measures related to road construction and use of machinery that would minimise harm to the sites, as well as obtainment of a Consent to Destroy for the portions of the site that could not be avoided.

Saunders (2005) Proposed residential subdivision Lot 8 DP 262883, Kiah Avenue, Cooma, NSW AHIMS #49407

This archaeological assessment was conducted to support a Development Application to Cooma-Monaro Shire Council, for a proposed 1.2 ha standard residential subdivision. While this may seem like a good analogue for the study area, it is in fact located on an area of higher ground to the West, on the Monaro Plains Granites, which is associated with a greater density of sites (**Error! Reference source not found.**, Figure 4, page 15). One small Aboriginal site (KA 1) was found in a disturbed area near the eastern boundary of the proposed subdivision adjacent to Kiah Avenue. This site was deemed to have low archaeological significance at a local level, but is considered culturally significant to the local Aboriginal community. No European sites were found within the proposed subdivision. While the site was not considered to pose any long-term constraints to the proposed subdivision, the author stated that Merrimans LALC may wish to salvage the artefacts prior to development impact. They stated the necessity of obtaining a Section 90 Consent to Destroy, in advance of any impacts.

Williams and Czastka (2005). Aboriginal Heritage Assessment – Buckenderra Holiday Village, Lake Eucumbene, Snowy River Shire, NSW. AHIMS #99585

This report is part of a wider statement of environmental effects, related to the development of Buckenderra Holiday Village on the foreshore of Lake Eucumbene, approximately 30 km west of the current study area. The study area was focussed on the creation of a series of cabins with associated road and drainage environments and the study included Aboriginal community consultation and survey, as well as desktop research. Background research led to a predictive model that suggested sites were most likely to occur close to permanent water sources, on raised areas such as ridgelines or crests. Sites in this region typically occur at elevations above the frigid, circulating air in the valleys. After survey, because of the extent of disturbance in the area, no areas of moderate or high sensitivity were identified. While the archaeologists did not require further archaeological investigation, prior to development, Merriman's LALC indicated that they should be invited to monitor excavation works prior to development.

Julie Dibden (2013) Proposed Subdivision, Lot 112, DP 832307 Bidgee Road, Cooma NSW. Aboriginal Cultural Heritage Due Diligence Assessment. AHIMS #102959

This archaeological assessment of a proposed subdivision of Lot 112 DP 832307, Bidgee Road, via Cooma, NSW, was required by Cooma Monaro Shire Council to support the Development Application. This area is approximately 10 km northwest of the current study area, close to the northwest trending ridgeline north of Cooma (**Error! Reference source not found.**, page **Error! Bookmark not defined.**). Dibden (2013) states that the area was of low archaeological potential, due to the distance from fresh water and the exposed rocky landscape/difficult terrain. Two low-density artefact scatters were found during visual survey, and a mitigation strategy was agreed with the client. No AHIP, therefore, was required to carry out the proposed works.

5.3 Local model of Aboriginal occupation and site location

In the Cooma-Monaro district a general correlation between the permanence of water and the permanence and/or complexity of Aboriginal occupation has been observed by previous researchers (e.g. Dibden, 2013). This means that locations associated with ephemeral or unreliable water sources are typically associated with open camp sites that exhibit low absolute artefact numbers and low densities, indicating a relatively low intensity of occupation over time. In addition, the range and complexity of activities carried out at sites is likely to correlate with proximity to a permanent water source. While open sites close to permanent water possess evidence of a greater range of lithic activities (i.e. procurement, flaking, retouch, bipolar reduction), sites near ephemeral water sources are more likely to be associated with a limited range of technological activities.

Because a limited number of intensive subsurface excavations have been carried out in the Cooma-Monaro area, the model above is based on work undertaken elsewhere. Dibden (2013) states that, "it can be reasonably expected that if comparable detailed work was carried out in the Monaro a similar model of site variability would be produced." But in the absence of a tailored, tested local model, a basic classification based on stream ordering is may be used to predict both the spatial relationship of Aboriginal camp sites to landforms and landscapes and to assess the likely complexity and intensity of occupation activities that were conducted at these sites.

Dibden (2013) used this predictive model based on stream ordering to make the following general statements about Aboriginal open site locations and their nature in the Cooma Monaro area:

- The density of artefacts in a locale will vary according to the permanence of water, landscape unit (including vegetation structure) and proximity to lithic resources.
- At the headwaters of upper tributaries (first order creeks) archaeological evidence will be sparse.
- At the middle reaches of minor tributaries (second order creeks) archaeological evidence will be sparse but indicate focussed activity.
- At the lower reaches of tributary creeks (third order creeks) archaeological evidence will indicate more frequent occupation and evidence of more concentrated activities.

- At major creeklines and rivers (fourth order) archaeological evidence will indicate more permanent occupation which is of greater complexity.
- Creek junctions may provide foci for site activity, and
- Ridgetops between drainage lines will usually contain limited evidence.

5.3.1 Summary

Patterns of site location in the Cooma Monaro area indicate that the most common site types and features are artefact scatters and isolated artefact. Other site types that may be present include: hearths, ceremonial grounds, stone arrangements, natural/mythological sites and modified trees. Table 4 summarises the predicted potential for various site features within the current activity area together with notes on the predicted landform sensitivity.

Table 4: Summary of predicted sites features and contextual sensitivity within the activity area.

Site Features	Predicted Potential	Sensitivity Within Activity Area
Stone artefacts	Moderate to high	Any landform. Increased sensitivity on low gradient landforms overlooking watercourses, particularly where prior disturbance is limited.
Hearth	Low-moderate	Any landform. Increased sensitivity on low gradient landforms, particularly where prior disturbance is limited.
Potential archaeological deposit (PAD)	Low-moderate	Erosive processes limit the chance of finding PAD Increased sensitivity on low gradient landforms where prior disturbance is minor.
Ceremonial/Dreaming	Low	May occur on any any landform.
Burial	Low	Any landform. Increased sensitivity in deeper, sandy soil profiles
Stone arrangements	Low	Any landform. Increased sensitivity on low gradient landforms, particularly where prior disturbance is limited.
Culturally modified tree	Low	Anywhere where mature trees remain.

5.4 Implications for the activity area

In terms of Aboriginal heritage, the study area is unlikely to have been a focus of intensive occupation and the cumulative impact of vegetation clearance and decades of grazing have further diminished the archaeological potential of the area. However, it is still possible that

the area was the focus of some occupation activity in the past and the nature of impacts are unlikely to have completely destroyed heritage values.

Given the nature of the local topography and geology, it is predicted that:

- there is a moderate potential for stone artefacts and stone artefact scatters to occur on the low hill that stretches across the southern extent of the site;
- there is low potential for stone artefacts and stone artefact scatters to occur on the undulating terrain that is in the northwestern extent of the site.
- there is a low-moderate potential for other site types to occur in the study area, and
- there is a low potential for stratified or intact subsurface archaeological deposits.

On the basis of the above desktop assessment, there is evidence to suggest that Aboriginal objects (e.g. artefact scatters and isolated artefacts) and/or other cultural heritage items may be present within areas of proposed ground disturbance. As such, a visual inspection is required.

6 STEP 4B – VISUAL ASSESSMENT 1, 07-04-22

6.1 Methodology

Visual inspection of Precincts 2 and 3 was conducted on 07/04/2022 by Clive Freeman and Peter Markovicz, Lantern Heritage Pty Ltd, in partnership with representatives from Merriman's LALC, including Warren Foster.

The visual inspection involved a pedestrian survey along the entire area of the proposed subdivision. The purpose of the survey was to identify and record Aboriginal objects and/or areas of potential archaeological deposits that relate to Aboriginal occupation. The participants in the survey were all involved in inspecting ground exposures for the presence of Aboriginal objects, which was undertaken by walking along/across proposed impact areas with individual participants inspecting all ground exposures that they encountered. All survey participants were also involved in discussions regarding the nature of soil deposits, prior impacts and predicted archaeological potential at each landform.

Observations were made regarding the soils, geology, vegetation, prior disturbance, ground surface exposures and visibility.

Field recording was primarily undertaken through digital recording methods on a mobile device (phone/tablet), with supplementary handwritten notes on hard copy maps of the study area. Copies of site cards (digital and/or hardcopies) for previously recorded sites were carried and referred to during the field survey. All field records were entered and managed by Clive Freeman from Lantern Heritage.

All photographs were captured on a mobile device with georeferencing of locations enabled, or on a digital camera with GPS capabilities.

The presence, nature and composition of vegetation was recorded including notes and observations regarding vegetation density, height, age and species. The average percentage of ground exposure incidence, and visibility within exposures, was recorded to the nearest 10%.

6.2 Field Survey Results

The archaeological survey undertaken in April 2022 covered the entire activity area, however only the exposures in the activity area were inspected and visibility was low outside of the exposures. Other than the exposed top of the low ridge, where thin rocky soils of very low archaeological potential were observed, ground visibility was very low (<10%). This made visual assessment of the study area extremely difficult and, although no archaeological sites were detected, we could rule out the presence of Aboriginal cultural heritage in this area, due to the nature of the landforms and spatially varied nature of modern disturbance.

A more detailed breakdown of the visual assessment, including relevant photos, is provided below for Precincts 2 and 3 individually. Warren Foster from Merriman's LALC suggested that, by conducting a cultural burn of the vegetation in this area, they can improve visibility, allowing for a more effective survey in advance of development.

6.2.1 Precinct Two (Lot 2 and 4 in DP 1285072)

Precinct 2 is the northeastern section of the study area (Figure 1, Figure 4), roughly lozenge-shaped and measuring approximately 650 x 350 m on its longest axes. Under these proposed works, it will be subject to excavation and building work as part of a housing development. While currently undeveloped, it has been cleared and subject to grazing during the historic period. Visibility during survey was <10% (effectively zero), due to the thick vegetation across the entire study site which included daisy yams (Plate 1, Plate 2, Plate 3). The only area where exposed ground was detected was the top of the ridgeline, where rocky soils with 10-15 cm large sub-angular stones were observed (Plate 4). The top of the ridgeline in this area also provides a view of other, higher ridgelines several km to the west, where archaeological sites have been recorded. Because of the vegetation cover, it was difficult to give a reliable assessment of archaeological potential in this area.



Plate 1: View from the top of the ridgeline, facing north (Precinct 2)
Plate 2: look south towards the top of the ridgeline (Precinct 2)



Plate 3: Daisy yams (Precinct 2)



Plate 4: Exposed rocks at top of ridgeline (Precinct 2)

6.2.2 Precinct 3 (Lot 3 in DP 1285072)

Precinct 3 is the southwestern section of the study area (Figure 4), roughly lozenge-shaped and measuring approximately 780 x 200 m on its longest axes. Under proposed works, it will be subject to excavation and building work as part of a housing development. While currently undeveloped, it has been cleared and subject to grazing during the historic period. Visibility during survey was effectively zero (Plate 5, Plate 6), due to the thick vegetation across the entire study site which included daisy yams. While a view from the ridgeline extends out over Cooma township and the wider valley (Plate 7), the reliable water source of Cooma Creek is ~ 1.5 km distant and the small creek in the area did not hold any water at the time of survey (Plate 8).

While low visibility hampered the effectiveness of this survey, some statements can be made. Aboriginal archaeology in this area is likely to be of low intensity and limited complexity, in terms of activities and technologies represented. If any artefacts are present, they are likely to be concentrated on the low hill, rather than the floodplain. Merriman's LALC representative Warren Foster had suggested carrying out a cultural burn, in advance of development, to expose more ground surface and increase the chance of finding any archaeological sites in this area.



Plate 5: vegetation in Precinct 3



Plate 6: Vegetation in Precinct 3



Plate 7: View of Cooma township from ridge line (looking west, Precinct 3)



Plate 8: Overgrown creek line (Precinct 3)

6.3 Summary

Survey visibility was <10 %, due to thick vegetation. This made visual assessment of the study area extremely difficult and, although no archaeological sites were detected, we could not rule out the presence of Aboriginal cultural heritage in this area and some further investigation was required. Representatives from Merriman's LALC have suggested that, by

conducting a cultural burn of the vegetation in this area, they could improve visibility, allowing for a more effective survey in advance of development.

Given that the visual assessment has identified areas where Aboriginal objects are likely to occur, it is prudent to review the question posed at Step 3 of the due diligence process: Can harm to Aboriginal objects and/or can the carrying out of the activity at the relevant landscape features be avoided? This question is addressed below in Section 7.

7 STEP 4B – VISUAL ASSESSMENT 2, 25-08-22

7.1 Methodology

Because of the concern over lack of visibility, a second visual inspection of Precincts 2 and 3 was conducted on 25/08/2022 by Conor McAdams and Christine Gant-Thompson, Lantern Heritage Pty Ltd, in partnership with representatives from Merriman's LALC, including Glenn Campbell.

This second visual inspection involved a pedestrian survey targeting key areas of the low hill, identified as an area of interest within the proposed subdivisions (Figure 4, Figure 7). Prior to the survey, vegetation had been removed from a number of 5 m x 5 m areas, to provide some visibility of the nature of soil cover and allow a better assessment of archaeological potential. As in the previous inspection, the purpose of the survey was to identify and record Aboriginal objects and/or areas of potential archaeological deposits that relate to Aboriginal occupation. The participants in the survey were all involved in inspecting ground exposures for the presence of Aboriginal objects, which was undertaken by walking along/across the cleared areas and other exposures within the proposed impact areas, with individual participants inspecting all ground exposures that they encountered. All survey participants were also involved in discussions regarding the nature of soil deposits, prior impacts and predicted archaeological potential at each landform.

Observations were made regarding the soils, geology, vegetation, prior disturbance, ground surface exposures and visibility.

Field recording was primarily undertaken through digital recording methods on a mobile device [phone/tablet], with supplementary handwritten notes on hard copy maps of the study area. All field records were entered and managed by Conor McAdams from Lantern Heritage.

All photographs were captured on a mobile device with georeferencing of locations enabled, or on a digital camera with GPS capabilities.

The presence, nature and composition of vegetation, including notes and observations regarding vegetation density, height, age and species, has been discussed in section 6. The average percentage of ground exposure incidence, and visibility within exposures, was recorded to the nearest 10%.

In order to record and present the results in a more easily digestible way, the study area was broken down into a series of landform-based survey units (Figure 7, Table). These were inspected individually and the results of survey are presented below in a survey unit by survey unit basis.

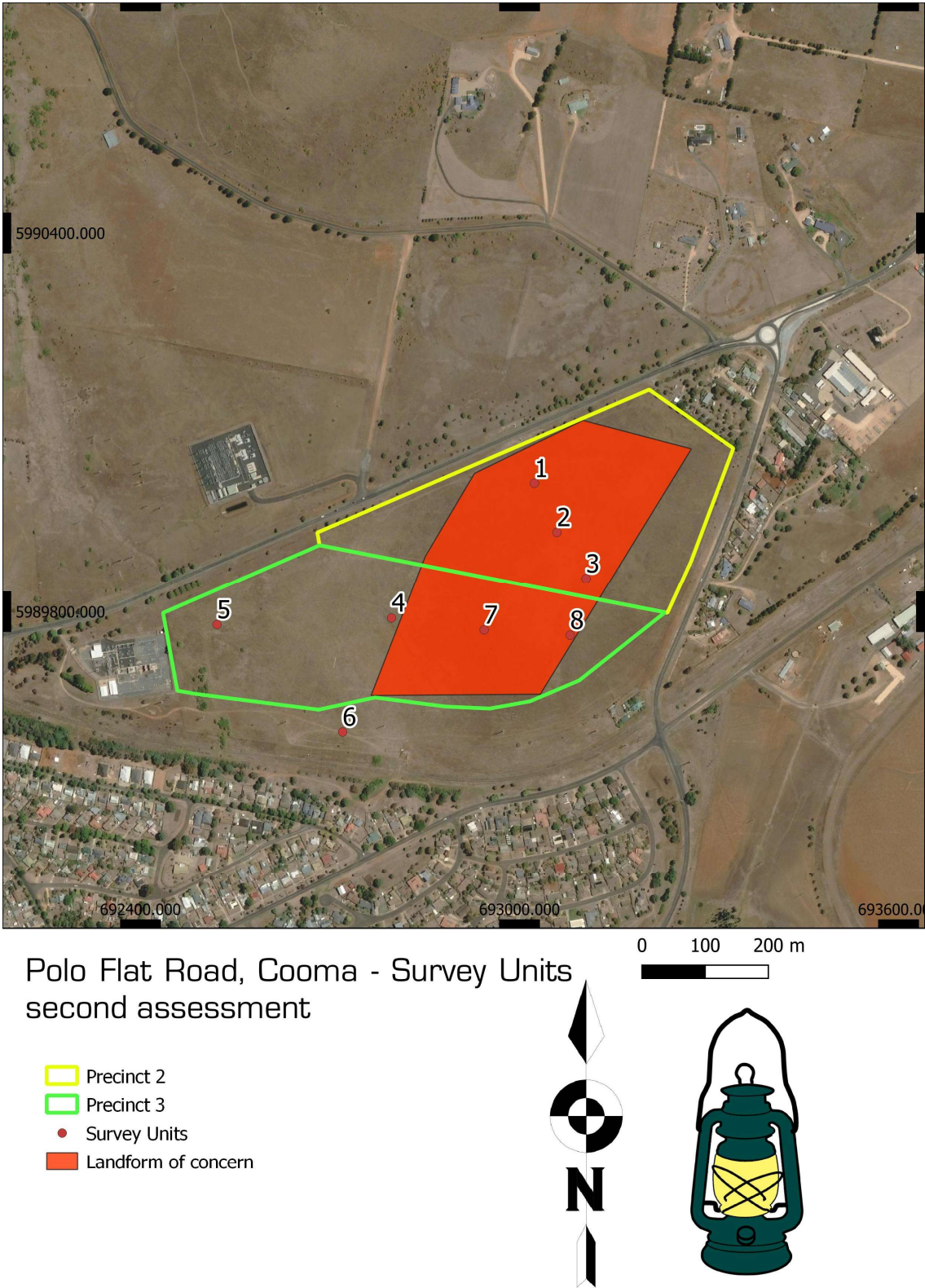


Figure 7: Survey Units from second assessment at Polo Flat Road, Cooma, and there relationship to the area of concern identified in previous assessment.

Table 5: Landscape settings of Survey Units from second assessment at Polo Flat Road, Cooma.

Survey Unit	Landscape setting
1	Precinct 2 lower slope
2	Precinct 2 mid-slope
3	Precinct 2 upper slope/crest
4	Precinct 3 lower slope and colluvial deposit
5	Precinct 3 area adjacent to drainage line
6	Exposure outside study area
7	Precinct 3 mid-slope
8	Precinct 3 upper slope/crest

7.2 Field Survey Results

The Archaeological due diligence survey work that was carried out on 25th of August 2022 was designed to systematically cover the area of interest identified in Section 6.3 and Figure 7, as well as an assessment of any other areas that were identified by Glenn Campbell as areas of interest. The survey covered a range of landform settings, including upper slope, mid-slope and lower slope settings in both Precinct 2 and Precinct 3, as well as a deposit of colluvial material at the base of the slope in Precinct 3 (survey unit 4) and an area of undulating ground beside the ephemeral watercourse in Precinct 3 (Survey unit 5). No archaeological deposits or artefacts were found and the soils on the slopes were found to be thin, rocky and eroded. While archaeological potential across the site was determined to be low-moderate, the thick colluvial deposit at the base of the slope in Precinct 3 retains the most archaeological potential of the areas surveyed. This is because of the possibility of material eroding from upslope and coming to rest in that landscape position.

7.2.1 Precinct 2 (Lot 2 and 4 in DP 1285072)

Precinct 2 is the northeastern section of the study area (Figure 1, Figure 4), roughly lozenge-shaped and measuring approximately 650 x 350 m on its longest axes. Under these proposed works, it will be subject to excavation and building work as part of a housing development. While currently undeveloped, it has been cleared and subject to grazing during the historic period. Because of the low visibility that hampered the previous survey, areas of vegetation measuring 5 m x 5 m were trimmed using a line trimmer. These provided a reasonable view of soils in three survey units, corresponding to lower slope, mid slope and

upper slope/crest environments. Details of observations at individual survey units are provided below.

7.2.1.1 Survey Unit 1: Precinct 2 Lower Slope

This was the first slashed area we investigated. Despite low visibility (< 10%) caused by a lack of exposures and thick grass covering almost all soil (Plate 9, Plate 10), subangular rocks (10-15 cm sized) could be seen protruding and this appears typical of the thin, rocky soils in the area (Plate 11). Earthworks were visible around 20m north, towards the main road, indicating significant disturbance in the area. No artefacts were observed and in general this area is considered of low archaeological potential (Plate 12).

7.2.1.2 Survey Unit 2: Precinct 2 Mid-slope

This area of slashed ground is very similar to that observed in Survey Unit 1, but on a steeper gradient slope and apparently even more eroded (Plate 13, Plate 14). No artefacts were observed and this area retains very low archaeological potential.

7.2.1.3 Survey Unit 3: Precinct 2 Upper Slope/Crest

Similar to the other two Survey Units in Precinct 2, this slashed area revealed rocky and eroded soils with very low archaeological potential (Plate 15, Plate 16). No artefacts were discovered during this survey.

7.2.2 Precinct 3 (Lot 3 in DP 1285072)

Precinct 3 is the southwestern section of the study area (Figure 4), roughly lozenge-shaped and measuring approximately 780 x 200 m on its longest axes. Under proposed works, it will be subject to excavation and building work as part of a housing development. While currently undeveloped, it has been cleared and subject to grazing during the historic period. Because of the low visibility that hampered the previous survey, areas of vegetation measuring 5 m x 5 m were trimmed using a line trimmer. These provided a reasonable view of soils in three survey units, corresponding to lower slope with thick colluvial deposit, mid slope, upper slope/crest and the area beside an ephemeral watercourse. An area of exposure provided by vehicle tracks beside power lines was also investigated. While outside the area of proposed impacts, this may provide some useful insights into the pedological environment at this site. Details of observations at individual survey units are provided below.

7.2.2.1 Survey Unit 4: Precinct 3 Basal Slope with Thick Colluvial Deposit

Survey Unit 4 covers a substantial deposit of colluvial material at the base of the slope in Precinct 3. Good exposures of the deposit are provided by erosion along its northern face (Plate 17, Plate 18), caused by cattle trample. The large rocks visible in the base of the deposit indicate that this deposit is the result of a landslide, rather than a gradual accumulation (Plate 19). No stratigraphic features indicative of archaeological potential were observed, and no artefacts were detected in this survey unit. This deposit may be considered to have low-moderate archaeological potential, but Merriman's LALC representative Glenn Campbell pointed out that he has found stone tools in similar settings and has suggested that a representative from Merriman's monitors the portions of works that involve ground disturbance in this area.



Plate 9: Area of trimmed vegetation at base of slope, looking northwest (Survey Unit 1, Precinct 2)



Plate 10: Looking north towards main road from base of slope (Survey Unit 1, Precinct 2)



Plate 11: Low visibility of rocky soil (Survey Unit 1, Precinct 2)



Plate 12: Looking south across cleared area (Survey Unit 1, Precinct 2)



Plate 13: Area of trimmed vegetation and rocky soil (Survey Unit 2, Precinct 2)



Plate 14: Close up of trimmed area with low visibility (Survey Unit 2, Precinct 2)



Plate 15: Looking south across cleared area at the top of the ridge (Survey Unit 3, Precinct 2)



Plate 16: Exposed rocks at top of ridgeline (Survey Unit 3, Precinct 2)



Plate 17: Looking west along eroded colluvial deposit (Survey Unit 4, Precinct 3).



Plate 18: Looking south at eroded colluvial deposit (Survey Unit 4, Precinct 3).



Plate 19: Large rocks within colluvial deposit (Survey Unit 4, Precinct 3)

7.2.2.2 Survey Unit 5: Precinct 3 Low-Lying Area Near Ephemeral Watercourse

The low-lying area overlooking the ephemeral watercourse in the northwestern extent of the study area is associated with various pieces of modern infrastructure, and has been subject to massive disturbance from sewer construction (Plate 20, Plate 21). Despite this, some areas of undulating ground remain undisturbed. No artefacts were found and the geomorphological evidence for a watercourse evidence very limited (Plate 22). Grass cover meant that visibility in this area was <10%, but the undisturbed parts of this area may be considered to have low-moderate archaeological potential.



Plate 20: Cleared area showing drain channel, looking west (Survey Unit 5, Precinct 3).



Plate 21: Cleared area, looking upslope to the southeast (Survey Unit 5, Precinct 3).



Plate 22: Looking southeast towards ephemeral drainage line (Survey Unit 5, Precinct 3)



Plate 23: Area of exposure outside study area (Survey Unit 6, west of Precinct 3)

7.2.2.3 Survey Unit 6: Precinct 3 Exposed Ground to South of Activity Area

This road exposure, associated with power lines, is outside the study area (Plate 23). It was inspected because it was hoped that the exposure may help with the assessment in light of the lack of stratigraphic exposures elsewhere across the site. Visible in the vehicle tracks was the upper surface of a compacted red soil. No artefacts were detected during visual assessment of the exposure.

7.2.2.4 Survey Unit 7: Precinct 3 Mid-Slope

Similar to the mid-slope slashed area in Precinct 2, this area was characterised by <10% visibility with a thin, rocky soil formed on a relatively steep gradient. No artefacts were found during this survey and the area may be considered very low archaeological potential.

7.2.2.5 Survey Unit 8: Precinct 3 Upper Slope/Crest

Similar to the hilltop area in Precinct 2, this slashed area revealed rocky and eroded soils with very low archaeological potential (Plate 24). No artefacts were discovered during this survey.



Plate 24: Upper slope/crest of hill (Survey Unit 8, Precinct 3)

7.3 Summary

Across much of the study area, visibility remained < 10%, due to the fine grass which obscured the ground surface even after slashing. While this impacted survey coverage to an extent, across much of the site soils were found to be the thin, rocky soils that are typical of slopes in this region. No artefacts were found during the survey, and combined with the exposures that were provided by erosive features, slashing and vehicle tracks, the study area can be understood as having low-moderate archaeological potential, with some areas of thin, rocky soil on the slopes having very low archaeological potential, due to the extent of their erosion.

The deposit of colluvial material in Precinct 3 (Survey Unit 4) is the highest potential area that was detected within the study area. Glenn Campbell from Merriman's LALC has indicated that, although desktop and visual assessment indicate a relatively low chance of disturbing archaeological material in this area, he has found Aboriginal cultural material in similar settings within the Cooma area. Merriman's LALC have suggested having a representative monitoring the portions of the work that disturb ground in this area as a way of mitigating any potential damage to Aboriginal cultural heritage values.

At this point, it is prudent to review the question posed at Step 3 of the due diligence process: Can harm to Aboriginal objects and/or can the carrying out of the activity at the relevant landscape features be avoided? This question is addressed below in Section 7.

8 STEP 5 - FURTHER INVESTIGATIONS AND IMPACT ASSESSMENT

8.1 Impact assessment

The visual assessment has indicated that the archaeological potential of the study area is low-moderate, with some areas of very low archaeological potential found on the eroded soils of the hill slopes. The colluvial deposit at the base of the slope is considered to have low-moderate archaeological potential, but representatives of Merriman's LALC have identified this as an area they are worried about, because they have found stone artefacts in similar settings around Cooma. They believe that having a representative from Merriman's LALC monitoring the ground disturbing works in this area will provide an effective way of mitigating any harm to Aboriginal cultural heritage values.

Step 3 of the due diligence process asks: Can harm to Aboriginal objects and/or can the carrying out of the activity at the relevant landscape features be avoided?

Based on the results of our survey, proposed works at Polo Flat Road, Cooma, are unlikely to harm Aboriginal artefacts. But the colluvial deposit at the base of the slope in Precinct 3 is retains the highest archaeological potential of any portion of the study area and representatives from Merriman's LALC believe there is some potential to harm Aboriginal artefacts in this area.

8.2 Options to avoid harm

Representatives from Merriman's LALC have proposed having a representative monitoring ground disturbing activities in the area of the colluvial deposit at the base of the slope in Precinct 3, as a way of mitigating any potential harm to Aboriginal cultural heritage values.

8.3 Summary

The visual assessment has indicated that the archaeological potential of the study area is low-moderate, with some areas of very low archaeological potential found on the eroded soils of the hill slopes. Based on the results of our survey, proposed works at Polo Flat Road, Cooma, are unlikely to harm Aboriginal artefacts. But the colluvial deposit at the base of the slope in Precinct 3 is retains the highest archaeological potential of any portion of the study area and representatives from Merriman's LALC believe there is some potential to harm Aboriginal artefacts in this area.

Representatives from Merriman's LALC have proposed having a representative monitoring ground disturbing activities in the area of the colluvial deposit at the base of the slope in Precinct 3, as a way of mitigating any potential harm to Aboriginal cultural heritage values.

Attention is also drawn to the fact that the due diligence process is covered by the caveat that the proponent can "[p]roceed with caution. If any Aboriginal objects are found, stop work and notify OEH. If human remains are found, stop work, secure the site and notify the NSW Police and OEH" (DECCW, 2010a: 10).

9 CONCLUSIONS AND RECOMMENDATIONS

On the basis of this due diligence assessment the archaeological potential of the study area is low-moderate, with some areas of very low archaeological potential found on the eroded soils of the hill slopes. Based on the results of our survey, proposed works at Polo Flat Road, Cooma, are unlikely to harm Aboriginal artefacts. But the colluvial deposit at the base of the slope in Precinct 3 retains the highest archaeological potential of any portion of the study area and representatives from Merriman's LALC believe there is some potential to harm Aboriginal artefacts in this area.

Representatives from Merriman's LALC have proposed having a representative monitoring ground disturbing activities in the area of the colluvial deposit at the base of the slope in Precinct 3, as a way of mitigating any potential harm to Aboriginal cultural heritage values.

The following recommendations have been formulated on the basis of the desktop review and visual assessment documented above:

- a) Proposed works across the study area, in both Precinct 2 and Precinct 3, may proceed with caution.
- b) Monitoring should be carried out by a representative of Merriman's LALC, during works that disturb the ground surface in the area of the colluvial deposit at the base of the slope in Precinct 3, as a way of mitigating any potential harm to Aboriginal cultural heritage values.
- c) This due diligence assessment only covers the works outlined in section 2 of this report. If additional impacts or alternative alignments are proposed, further assessment will be required.
- d) A copy of this report, and any subsequent due diligence investigations, should be kept on record, and if requested, supplied to the relevant government agency as proof of compliance with the *Due Diligence Code of Practice*.

10 REFERENCES

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APPENDIX 1 – AHIMS SEARCH

AHIMS Web Services (AWS)											
Extensive search - Site list report											
State	Section	Idnum	Zone	Latitude	Longitude	Geocast	Site Status	Site Features	Site Data	Records	
62-2-0384	Harriet 12	Recorders	55	695528	601169	Open site	Valid	Archeol: 10			
	Contact	Recorders	Mr Charles Harling				Valid	Archeol: 10			
62-2-0381	Harriet 5	Recorders	55	695680	600972	Open site	Valid	Archeol: 22			
	Contact	Recorders	Mr Charles Harling				Valid	Archeol: 22			
62-2-0336	Registration applied. Please contact ahimsa@environment.nsw.gov.au	Recorders	Miss Vanessa Nason			Open site	Valid				
	Contact	Recorders	Merrihue L.L.C				Valid				
62-2-0038	CL 3:	Recorders	55	699010	60442.0	Open site	Valid	Archeol: -	Open Camp Site		
	Contact	Recorders	Decemilian Center				Valid	Archeol: -	Open Camp Site		
62-2-0288	MOJLD 2:	Recorders	55	699520	600080	Open site	Valid	Archeol: -			
	Contact	Recorders	Mr Matthew Barber				Valid	Archeol: 4			
62-2-0354	The River 3 and FAO (TR3)	Recorders	55	688885	594530	Open site	Valid	Archeol: 4			
	Contact	Recorders	Naam Oyster Fisheries Consultants Pty Ltd				Valid	Archeol: 1			
62-2-0352	The River 7 (R1)	Recorders	55	690920	591979	Open site	Valid	Archeol: 1			
	Contact	Recorders	Naam Oyster Fisheries Consultants Pty Ltd				Valid	Archeol: 2			
62-2-0402	Bridge Road 1	Recorders	55	686545	595667	Open site	Valid	Archeol: 2			
	Contact	Recorders	Decemilian Builders				Valid	Archeol: 2			
62-2-0398	Mercu	Recorders	55	687796	598180	Open site	Valid	Archeol: 2			
	Contact	Recorders	Ms Alice Williams				Valid	Archeol: 1			
62-2-0385	Ka 2 (Ka 2 Avenue 2)	Recorders	55	689866	598676	Open site	Valid	Archeol: 1			
	Contact	Recorders	Ms Tish Sanders				Valid	Archeol: -	Open Camp Site		
62-2-0271	Cooma Sewerage 2:	Recorders	55	689910	5991420	Open site	Valid	Archeol: -			
	Contact	Recorders	Ian Kane/Kerry North				Valid	Archeol: -	Open Camp Site		
62-2-0214	Cooma Sewerage 1:	Recorders	55	688400	591870	Open site	Valid	Archeol: -			
	Contact	Recorders	Ian Kane/Kerry North				Valid	Archeol: -	Open Camp Site		
62-2-0400	Deepford Ridge	Recorders	55	690087	598620	Open site	Valid	Archeol: 1			
	Contact	Recorders	Ms Alice Williams				Valid	Archeol: 1			
62-2-0397	Millum Range North Ridge Fire Site	Recorders	55	691604	5988578	Open site	Valid	Archeol: 11			
	Contact	Recorders	Ms Alice Williams				Valid	Archeol: 11			
62-2-0374	Church Hill 5011	Recorders	55	691664	5988078	Open site	Valid	Archeol: 11			
	Contact	Recorders	Ms Andrew Pearce				Valid	Archeol: 11			
62-2-0386	Church Hill 5011 North Coora	Recorders	55	691664	5988078	Open site	Valid	Archeol: 11			
	Contact	Recorders	Ms Andrew Pearce				Valid	Archeol: 11			
62-2-0258	Field 2:28:	Recorders	55	694520	598660	Open site	Valid	Archeol: -	Open Camp Site		
	Contact	Recorders	Kerry North				Valid	Archeol: -	Open Camp Site		

Report generated by AHIMS Web Service on 15/04/2022 for Project Number: 15, Latitude: 600900.0, Longitude: 597000.0, Northings: 597000.0, Eastings: 601000.0

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Client Service ID : 6755525

Field	Subname	Owner	Zone	Estimate	Location	Site Status	Subcategory	Site Type	Report
62-2-3172	Paracet 1	ACD	55	695115	6003312	Open site	Valid	Arched 13	Paracet 13
62-2-3173	Paracet 2	ACD	55	695481	6003433	Open site	Valid	Arched 12	Paracet 12
62-2-3030	Paracet 7, Crown Creek 7,	ACD	55	695200	6003433	Open site	Valid	Stone Quarry 1	1193
62-2-2012	RO6 Runwater River	ACD	55	695300	5999393	Open site	Valid	Arched 11	Open Camp Site
62-2-2187	Model 1	ACD	55	699350	6005579	Open site	Valid	Arched 10	Open Camp Site
62-2-2043	Ch 16	ACD	55	699600	6002330	Open site	Valid	Arched 1	Open Camp Site
62-2-2413	Excess Transmission Line (old) (1911-1913)	Ch 16	55	689940	5942189	Open site	Valid	Arched 1	Open Camp Site
62-2-3069	Ch 14 (1) (Crown Creek 6)	ACD	55	689938	5996531	Open site	Valid	Arched 15	Open Camp Site
62-2-2313	Crown Creek 1	ACD	55	690400	5991879	Open site	Valid	Arched 1	Open Camp Site
62-2-2342	Ch 7 (2)	ACD	55	692250	6006530	Open site	Valid	Arched 11	Open Camp Site
62-2-2344	Ch 7 (2-3)	ACD	55	694300	6019393	Open site	Valid	Arched 11	Open Camp Site
62-2-2340	Ch 7 (2-3)	ACD	55	694500	5998853	Open site	Valid	Arched 11	Open Camp Site
62-2-2321	Ch 7 (2-3)	ACD	55	694900	5991723	Open site	Valid	Arched 11	Open Camp Site
62-2-2032	Paracet 1	ACD	55	695300	5995230	Open site	Valid	Arched 11	Open Camp Site
62-2-2379	Paracet 11	ACD	55	695400	6001731	Open site	Valid	Arched 11	Open Camp Site
62-2-2032	Paracet 1	ACD	55	699710	5995723	Open site	Valid	Arched 11	Open Camp Site
62-2-2036	Paracet 1	ACD	55	699600	6002230	Open site	Valid	Arched 11	Open Camp Site

AHIMS Web Services (AWS)										
Extensive search - Site list report										
State	Subname	Datum	Zone	Easting	Northing	Location	Site Status	Substrata	Subtypes	Remarks
62-2-0235	Chabla Quarry Shiny Side	AD	55	6903570	6003560	Open site	Valid	Stone Quarry	Quarry	
62-2-0236	Dooda Crg	Recorders	Dooda, Jilauri, Gander			Open site	Valid	Artificial	Open Camp Site	2372
62-2-0240	CA 5	AD	55	6908850	6002500	Open site	Valid	Artificial	Open Camp Site	
62-2-0240	CA 5	AD	55	6909000	6002600	Open site	Valid	Artificial	Open Camp Site	
62-2-0240	R22 Numerals River	Recorders	North-Jillauri, Gander			Open site	Valid	Artificial	Open Camp Site	1023
62-2-0242	CA 7	AD	55	6909600	5997700	Open site	Valid	Artificial	Open Camp Site	
62-2-0242	CA 7	AD	55	6909900	6002750	Open site	Valid	Artificial	Open Camp Site	
62-2-0253	The River / (T17)	Recorders	Dooda, Jilauri, Gander			Open site	Valid	Artificial	Open Camp Site	4077
62-2-0253	T17	AD	55	6908800	5997300	Open site	Valid	Artificial	Open Camp Site	
62-2-0253	CA 3 (Gander Back Creek 3)	Recorders	North-Jillauri, Gander			Open site	Valid	Artificial	Open Camp Site	
62-2-0253	CA 3	AD	55	6909350	5980500	Open site	Valid	Artificial	Open Camp Site	
62-2-0248	Storie	Recorders	McTish-Sanders			Open site	Valid	Artificial	Open Camp Site	
62-2-0248	Storie	AD	55	6900000	5995500	Open site	Valid	Artificial	Open Camp Site	
62-2-0242	Coona Swamps 4	Recorders	Elizabeth, Koro			Open site	Valid	Artificial	Open Camp Site	
62-2-0242	Coona Swamps 4	AD	55	6889550	5990900	Open site	Valid	Artificial	Open Camp Site	
62-2-0245	Old Schoolhouse	Recorders	Jas Niver, Kerry Niver			Open site	Valid	Artificial	Open Camp Site	
62-2-0245	Old Schoolhouse	AD	55	6903500	6004600	Open site	Valid	Artificial	Open Camp Site	
62-2-0227	Lambie Engr 1	Recorders	Ruthymore			Open site	Valid	Artificial	Open Camp Site	
62-2-0227	Lambie Engr 1	AD	55	6902500	5986900	Open site	Valid	Artificial	Open Camp Site	
62-2-0234	Mt (Gander)	Recorders	McTish-Sanders			Open site	Valid	Artificial	Open Camp Site	9842
62-2-0234	Mt (Gander)	AD	55	6911400	5990900	Open site	Valid	Artificial	Open Camp Site	
62-2-0243	BP-2 33	Recorders	McTish-Sanders			Open site	Valid	Artificial	Open Camp Site	
62-2-0243	BP-2 33	AD	55	6935000	6001240	Open site	Valid	Artificial	Open Camp Site	
62-2-0244	MBK 3	Recorders	Kerry Niver			Open site	Valid	Artificial	Open Camp Site	10206
62-2-0244	MBK 3	AD	55	6908300	5982570	Open site	Valid	Artificial	Open Camp Site	
62-2-0255	Hirect 13	Recorders	FW Shavers			Open site	Valid	Artificial	Open Camp Site	
62-2-0255	Hirect 13	AD	55	6928730	6001300	Open site	Valid	Artificial	Open Camp Site	
62-2-0202	Red Flag, Awaru	Recorders	McTish-Sanders			Open site	Valid	Artificial	Open Camp Site	
62-2-0202	Red Flag, Awaru	AD	55	6908200	5980500	Open site	Valid	Artificial	Open Camp Site	
62-2-0239	Coona Wind Farm 2 - (CMF2)	Recorders	JB Road			Open site	Valid	Artificial	Open Camp Site	
62-2-0239	Coona Wind Farm 2 - (CMF2)	AD	55	6901200	5994500	Open site	Valid	Artificial	Open Camp Site	

AHIMS Web Services (AWS) Extensive search - Site list report										
SiteID	SiteName	Datum	Zone	Latitude	Longitude	Category	Site Status **	SiteStatus	SiteType	Results
62-2-0137	Contact On 24th 1993	Records ACD	SS 698850	6004200	Open site	Valid	Archaeol:-	Locals	Open Camp Site	
62-2-0136	Contact RTP 2-2-26	Records ACD	SS 698790	5975190	Open site	Valid	Archaeol:-	Locals	Open Camp Site	102206
62-2-0134	Contact On 11-	Records ACD	SS 699000	6004200	Open site	Valid	Archaeol:-	Locals	Open Camp Site	
62-2-0135	Contact On 4-	Records ACD	SS 699550	6004090	Open site	Valid	Archaeol:-	Locals	Open Camp Site	
62-2-0131	Contact On 6-	Records ACD	SS 699650	6004000	Open site	Valid	Archaeol:-	Locals	Open Camp Site	
62-2-0136	Contact Tim River 5 (RIS)	Records GDA	SS 699000	5995508	Open site	Valid	Archaeol:1	Locals		99277
62-2-0133	Contact T'huasell	Records GDA	SS 699507	5995663	Open site	Valid	Archaeol:5	Locals		102959
62-2-0130	Contact CPCA 5 (Gomina Bank Creek 5)	Records GDA	SS 699752	5996474	Open site	Valid	Archaeol:2	Locals		
62-2-0136	Contact North Ridge South	Records GDA	SS 691132	5982940	Open site	Valid	Aboriginal Cemetery and Interiors:1	Locals		
62-2-0135	Contact Marrick Crossing	Records ACD	SS 691500	6001900	Open site	Valid	Archaeol:-	Locals		
62-2-0136	Contact RTP 2-2-29	Records ACD	SS 694350	5986430	Open site	Valid	Archaeol:-	Locals	Open Camp Site	102206
62-2-0137	Contact Hartat 8	Records ACD	SS 695012	6001125	Open site	Valid	Archaeol:1	Locals		
62-2-0135	Contact Hartat 3	Records ACD	SS 695397	6000522	Open site	Valid	Archaeol:11	Locals		
62-2-0130	Contact Baysan To Gown Creek 5	Records ACD	SS 690200	6002000	Open site	Valid	Archaeol:-	Locals	Open Camp Site	1190
62-2-0137	Contact Baysan	Records ACD	SS 690550	6001570	Open site	Valid	Archaeol:-	Locals	Open Camp Site	
62-2-0133	Contact RCP	Records ACD	SS 699600	6002300	Open site	Valid	Archaeol:-	Locals	Open Camp Site	1033
62-2-0136	Contact Middell Ridge	Records ACD	SS 698370	6002160	Open site	Valid	Archaeol:-	Locals	Open Camp Site	

Report generated by AHIMS Web Services on 13/04/2022 for Peter Markovic for the following area at Datum: GDA, Zone: 55, Eastings: 600000.0 - 705000.0, Northings: 597000.0 - 601000.0 with a Buffer of 0 meters. Number of Aboriginal sites and Aboriginal objects found is 104.

This information is not guaranteed to be free from errors and/or omissions and is for information and convenience of users only and is not intended to be used for any other purpose.

AHIMS Web Services (AWS)										
Extensive search - Site list report										
State	Subname	Daum	Zone	Rating	North	East	Site Status	Substance	Site Type	Remarks
62-2-0399	Mc Clachline	GPA	E5	688721	598245	Open site	Valid	Aboriginal Ceremony and Dreming: 1		
62-2-0364	KA 1 (Robb Avenue 1)	Records	Mc Alice Williams	55	688921	598681	Open site	Arctax: 4		99407
62-2-0001	Oaklea Creek	Records	Mc Tress Saunders	55	691340	598280	Open site	Arctax: 1	Open Camp Site	
62-2-0237	EEF 2-25	Records	In Flood	55	691100	598250	Open site	Arctax: 1	Open Camp Site	102206
62-2-0300	Harriet 4	Records	Kerry Nason	55	690975	600140	Open site	Arctax: 4		
62-2-0376	Harriet 7	Records	Mc Charles Darling	55	691864	600080	Open site	Arctax: 3		
62-2-0378	Harriet 9	Records	Mc Charles Darling	55	691245	600054	Open site	Arctax: 2		
62-2-0323	EEF 2-31	Records	Mc Charles Darling	55	691130	599130	Open site	Arctax: 1	Open Camp Site	
62-2-0381	Harriet 10	Records	FW Shivers	55	691515	600062	Open site	Arctax: 3		
62-2-0433	RFQ 1	Records	Mc Charles Darling	55	691861	597531	Open site	Arctax: 2		
62-2-0027	Bunyan To Down Creek 4	Records	Mc Charles Darling	55	691500	600060	Open site	Arctax: 1	Quarry	1198
62-2-0021	Bunyan To Down Creek 2	Records	Decker Tim Stone	55	691680	599920	Open site	Arctax: 1	Open Camp Site	1198
62-2-0007	RLC Minnehaha River	Records	Decker Tim Stone	55	691000	599440	Open site	Arctax: 1	Open Camp Site	1083
62-2-0289	MOULD 3	Records	Robert Peck	55	690600	599950	Open site	Arctax: 1	Isolated Find	
62-2-0355	The River 4 and PAU (TB4)	Records	Mc Charles Darling	55	689100	599623	Open site	Arctax: 4		99277
62-2-0337	CS	Records	Norrie Grace Heritage Community Pty Ltd	55	691600	599630	Open site	Arctax: 1		
62-2-0382	Harriet 6	Records	Mc Charles Darling	55	691922	600044	Open site	Arctax: 19		1225
62-2-0365	NER2	Records	Mc Charles Darling	55	691950	599100	Open site	Arctax: 3	Open Camp Site	

Report generated by AHIMS Web Services on 13/04/2022 for Peter Mathews, for the following areas at Daum: GPA, Zone: 55, Eastings: 688920.0 - 705000.0, Northings: 597000.0 - 601000.0 with a Buffer of 0 meters. Number of Aboriginal sites and Aboriginal objects found is 104

Your Ref/No Number : Cooma/Memo263
Client Service ID : 675525

Your Ref/PO Number : Coonia/Merrimans163
Client Service ID : 675525

[illegible]

