

ARCHAEOLOGY – HERITAGE – MEDIATION – ARBITRATION

GRIFFITH BASE HOSPITAL

Aboriginal Cultural Heritage Assessment Report

SSDA Works

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REPORT TO	NSW HEALTH INFRASTRUCTURE
LGA	GRIFFITH CITY COUNCIL
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EXECUTIVE SUMMARY

NSW Health Infrastructure are undertaking a redevelopment of the Griffith Base Hospital. The project will provide expanded inpatient, surgical, ambulatory care and critical care services to Griffith Base Hospital. It will also enable the consolidation of several ageing and dislocated buildings into an integrated and contemporary healthcare facility.

To ensure that the Aboriginal archaeological and cultural heritage significance of the study area is not adversely impacted upon by the proposal Comber Consultants were engaged to undertake an Aboriginal archaeological assessment. That assessment recommended that Aboriginal consultation should be undertaken and an Aboriginal Cultural Heritage Assessment Report prepared detailing that consultation. It was further recommended that once the consultation had been completed it would be necessary to undertake testing in accordance with the *Code of Practice for Archaeological Investigation in NSW*. Accordingly, Comber Consultants were commissioned to undertake Aboriginal consultation in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* and provide this report and to undertake the archaeological testing. Attached to this report at Appendix B is the Aboriginal archaeological assessment and attached at Appendix C is the Aboriginal archaeological testing report.

As a result of the consultation, the Griffith Local Aboriginal Land Council is the only registered Aboriginal Party.

As a result of the consultation and testing this report makes the following recommendations:

1. No further archaeological assessment, monitoring, testing or salvage is required within the boundaries of the State Significant Development area. Sufficient information has been gained from the program of testing.
2. Consultation with the Griffith Local Aboriginal Land Council should continue.
3. Interpretation of the archaeology and Aboriginal history of Griffith and the site of the Griffith Base Hospital should be included in the redevelopment of the hospital site. This could include story boards, installations and artwork. An interpretation strategy and plan should be developed to guide this interpretation.
4. If any previously unexpected or undetected Aboriginal objects are uncovered during the proposed hospital redevelopment, all works should cease in the vicinity of that object and further advice sought from the consultant.



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1.0 INTRODUCTION

1.1 Background

NSW Health Infrastructure are undertaking the redevelopment of the Griffith Base Hospital. Details of the proposal are contained in Section 2 of this report.

To ensure that the Aboriginal archaeological significance of the study area is not adversely impacted upon by the proposal, Comber Consultants were commissioned to undertake an Aboriginal archaeological assessment. That report was prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*. That report assessed the study area to contain subsurface Aboriginal archaeological potential and recommended Aboriginal consultation and archaeological test excavation be undertaken (Comber 2020).

Accordingly, consultation was undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Guidelines for Proponents 2010* and Aboriginal archaeological test excavations were undertaken in association with the Registered Aboriginal Party, the Griffith Local Aboriginal Land Council. The excavations were undertaken from 5/5/2020 to 14/5/2020 in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* and the Research Design prepared by Jillian Comber dated 16 April 2020 Version A. This report details the results of the consultation, assessment and test excavations.

As a result of the consultation the Griffith Local Aboriginal Land Council are the Registered Aboriginal Party (RAP). Test excavations uncovered 271 artefacts across five Potential Archaeological Deposits (PADs) located across Griffith Base Hospital. As a result of the testing it has been determined that with the SSDA boundaries, no further assessment, monitoring, testing or salvage is required. Sufficient information has been obtained from the program of testing to provide information about the Aboriginal archaeology and cultural heritage within the SSDA boundaries.

1.2 Site Location and Description

The city of Griffith lies within the Murrumbidgee Irrigation Area, in the north western Riverina region of New South Wales, approximately 480km west of Sydney and is located within the Griffith City Council Local Government Area (LGA) (Figure 1)

The Griffith Base Hospital, referred to as 'the study area', is located at 5-39 Animoo Avenue, Griffith NSW and is known as Lot 2 DP, 1043580 (Figure 2).

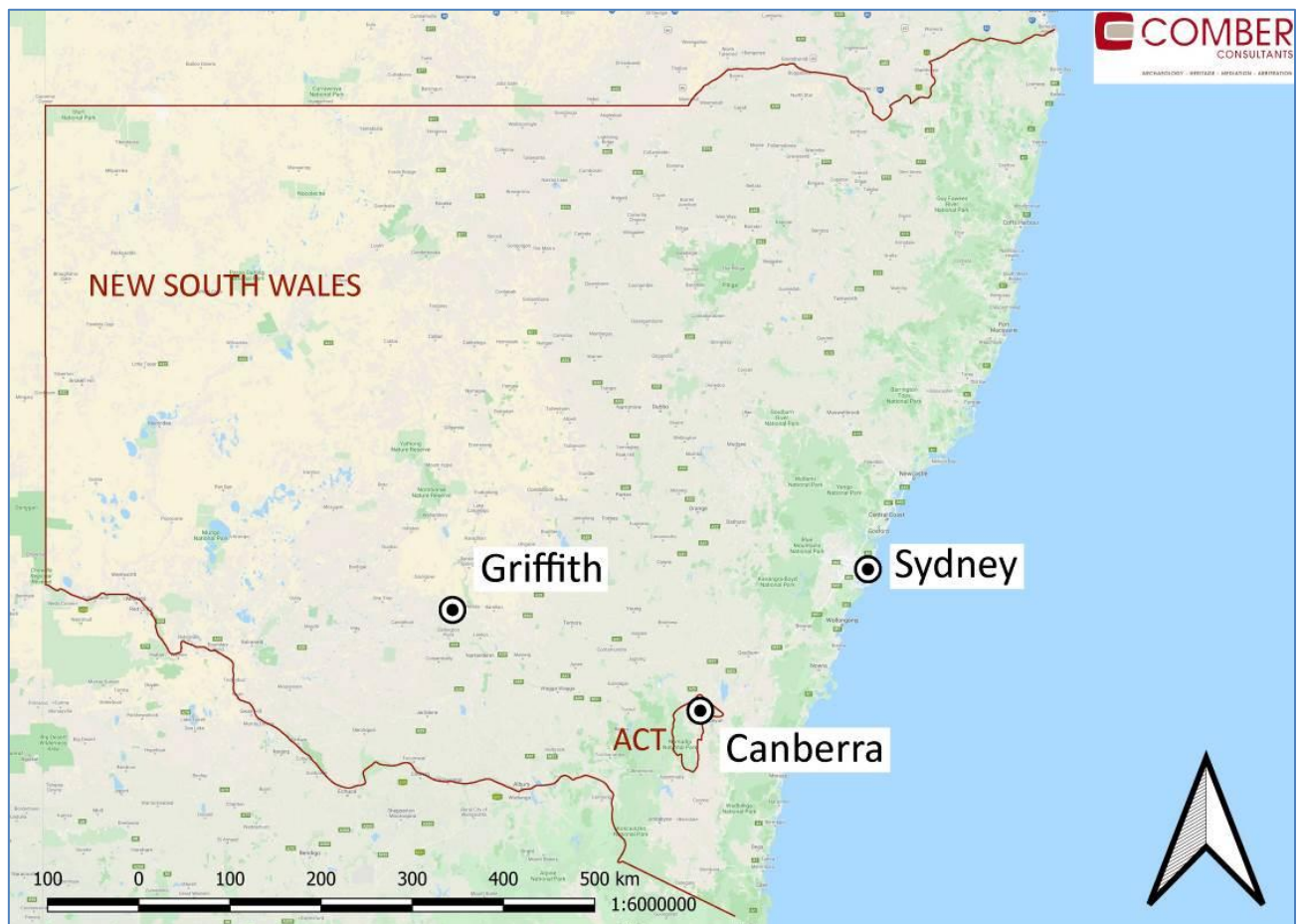


Figure 1: Location map



Figure 2: Location of study area within Griffith NSW



1.3 Statutory Controls

National Parks & Wildlife Act 1974

The *National Parks & Wildlife Act 1974* (NPW Act) provides statutory protection to all Aboriginal sites within New South Wales. Heritage NSW is the State Government agency responsible for the implementation and management of this Act.

Part 6 of the *National Parks & Wildlife Act* states that it is an offence to harm or desecrate an Aboriginal object or Aboriginal place, without an Aboriginal Heritage Impact Permit (AHIP). An Aboriginal objects is defined as:

Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.

An Aboriginal Place is defined as:

A place that, in the opinion of the Minister, is or was of special significance with respect to Aboriginal culture, to be an Aboriginal place for the purposes of this Act.

As this project is being assessed as a State Significant Development approval under Part 6 of the *National Parks & Wildlife Act 1974* will not be required. Please see below.

Environmental Planning & Assessment Act 1979

This project is being undertaken as a State Significant Development under Part 4, Division 4.1 of the *Environmental Planning & Assessment Act 1979* (EPA Act). Section 89J of the EPA Act (see below) does not require that a State Significant Development seek approval under the NPW Act as follows:

Section 89J of the EPA Act states the following:

89J Approvals etc legislation that does not apply

The following authorisations are not required for State significant development that is authorised by a development consent granted after the commencement of this Division (and accordingly the provisions of any Act that prohibit an activity without such as authority do not apply):

- (a) the concurrence under Part 3 of the *Coastal Protection Act 1979* of the Minister administering that Part of that Act,
 - (b) a permit under section 201, 205 or 219 of the *Fisheries Management Act 1994*
 - (c) an approval under Part 4, or an excavation permit under section 139, of the *Heritage Act 1977*
 - (d) an Aboriginal heritage impact permit under section 90 of the *National Parks and Wildlife Act 1974*
 - (e) an authorisation referred to in section 12 of the *Native Vegetation Act 2003* (or under any Act repealed by that Act) to clear native vegetation or State protected land,
 - (f) a bush fire safety authority under section 100B of the *Rural Fires Act 1997*,
 - (g) a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the *Water Management Act 2000*.
- (2) Division 8 of Part 6 of the *Heritage Act 1977* does not apply to prevent or interfere with the carrying out of State significant development that is authorised by a development consent granted after the commencement of this Division.
- (3) A reference in this section to State significant development that is authorised by a development consent granted after the commencement of this Division includes a reference to any investigative or other activities that are required to be carried out for the purpose of complying with any environmental assessment requirements under this Part in connection with a development application for any such development.

The EPA Act is administered by the Department of Planning Industry and Environment who will provide the consent for this project and for any impact on Aboriginal objects. Section 89J(d) does not require the consent of the NSW Heritage Office.

1.4 Objectives of the Aboriginal Cultural Heritage Assessment Report (ACHAR)

This ACHAR details the results of the assessment and recommendations for actions to be taken before, during and after the proposed activities associated with the project in order to manage and protect Aboriginal objects identified by the investigation, assessment and testing of the study area.



2.0 PROPOSAL

The original buildings of the Griffith Base Hospital were constructed in 1931 and have since been altered and extended many times and new buildings constructed. The first extensions/new building works commenced in 1935 and continued until 1999. The need for the redevelopment is to improve efficiencies across the hospital, improve aging infrastructure and address the changing models of healthcare to meet future growth and demand.

The proposed works are detailed below and shown on Figures 3-5.

- Demolition of Buildings 1, 2, 6, 9, 15, 16, 17, 19, 20, 22, 25, 28 29, 31 and 35
- Construction of new clinical services building
- Construction of new western car park
- Construction of new main car park
- Demolition of temporary car park
- Landscaping work



Figure 3: Current layout of Griffith Base Hospital (DJRD)

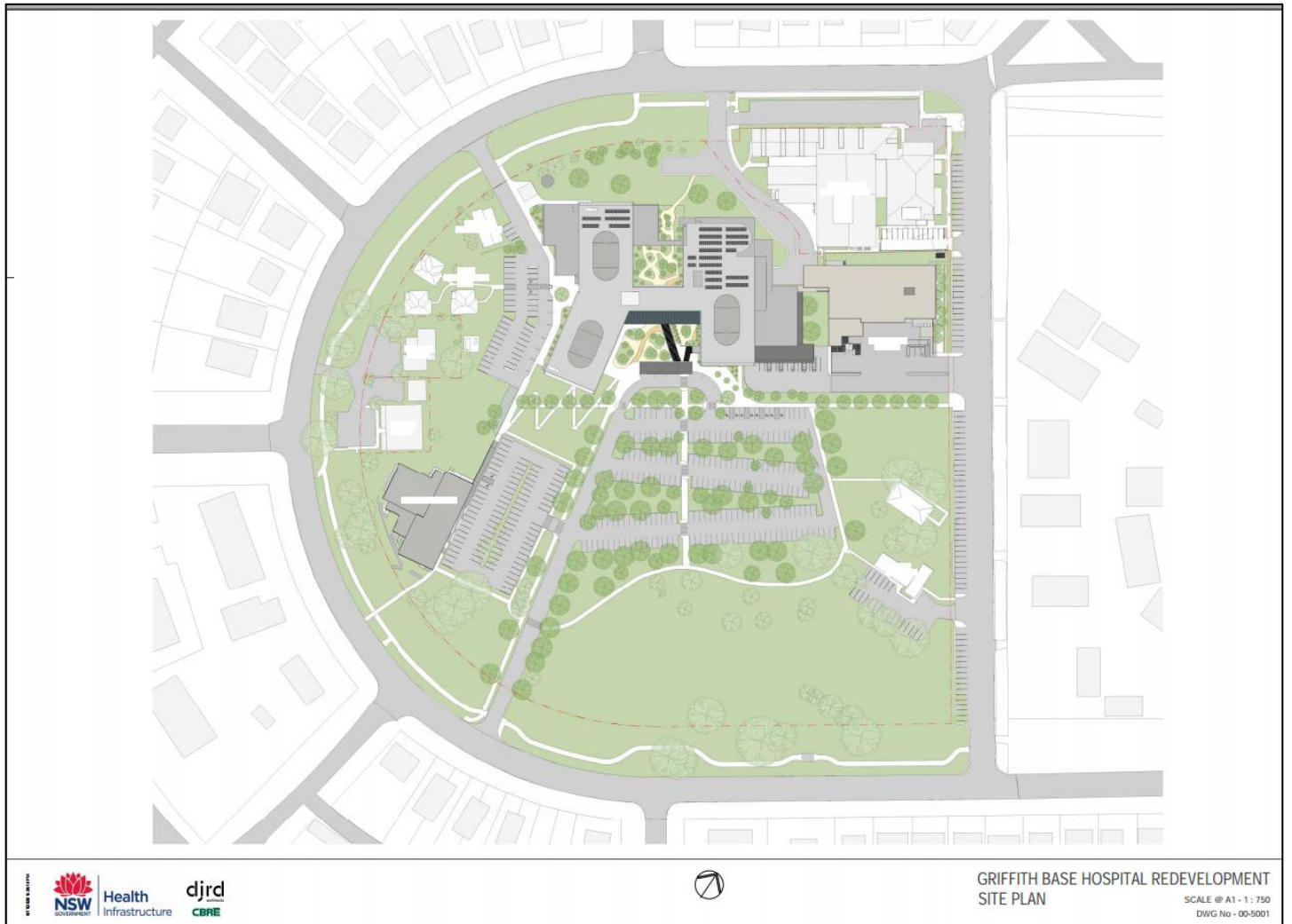


Figure 4: Griffith Base Hospital redevelopment plan (DJRD)

3.0 ABORIGINAL HISTORY

Griffith is located within the western portion of Wiradjuri country. Wiradjuri country is located in central New South Wales and encompasses an area of over 80,000 square kilometres making it one of the largest Aboriginal language regions in Australia (Macdonald 2004:22). See Figure 5. The term Wiradjuri can refer to the people, their language or the geographical area designated as Wiradjuri Country (Macdonald 1986:3). Where once it may have clearly referred to a language group, today Wiradjuri people are defined by an extensive kin network (Macdonald 1986; Read 1983:xii) and by their cultural heritage.

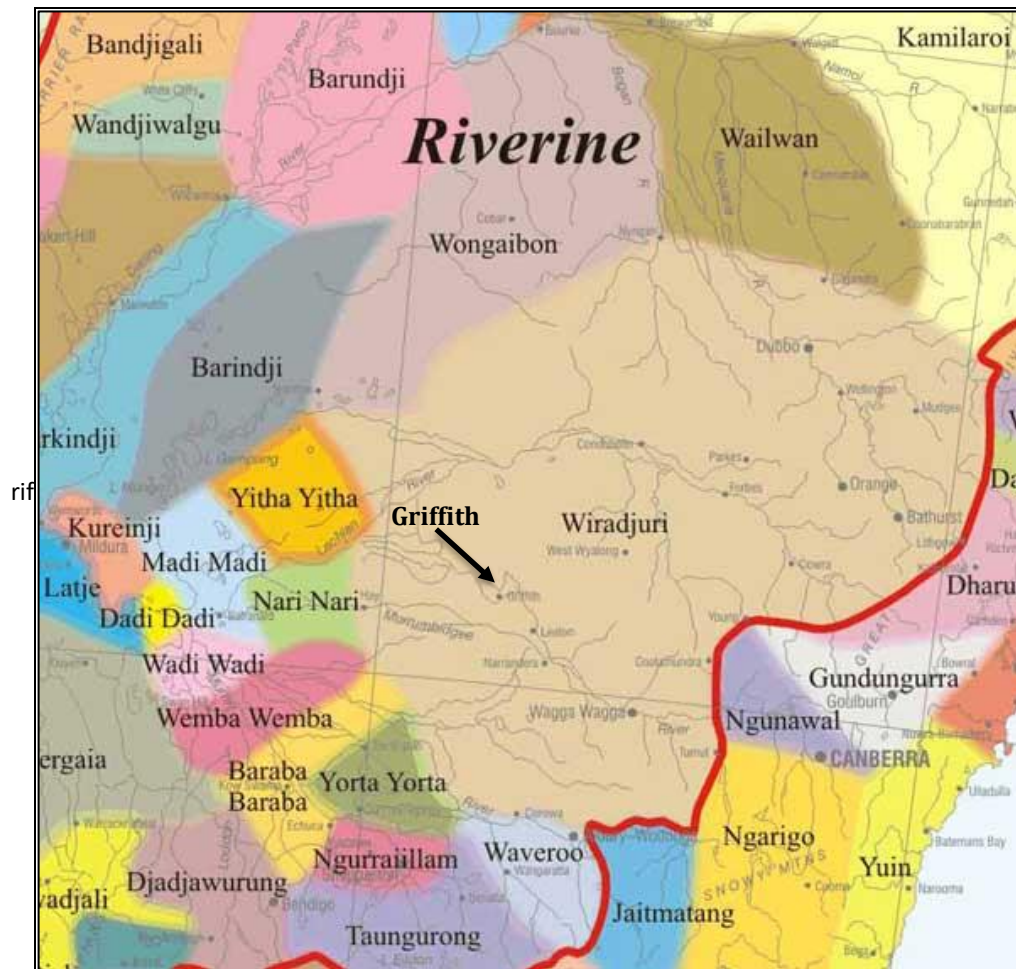


Figure 5: Showing the location of the Wiradjuri Nation within the Riverina (Horton 1996)

Wiradjuri country includes part of the Riverine region on the central west slopes and plains of New South Wales and extends from Nyngan to Albury, and Bathurst to Hay (Horton 1994(2):1189; Macdonald 2004:22) (Figure 6). Wiradjuri people refer to their land as “The Country of the Three Rivers”, with the watershed of the Macquarie, Lachlan and Murrumbidgee Rivers forming the boundaries. The Macquarie River in the north was known to the Wiradjuri as “Wambool”; the Lachlan River, which was known to the Wiradjuri as “Kalar”, is to the west and the Murrumbidgee, which retains its traditional Wiradjuri name, flows to the south. The Macquarie meets the Barwon and flows west into the Darling River and then flows south. The area around the Lachlan, Macquarie, Murrumbidgee and Darling Rivers is the area traditionally inhabited by Wiradjuri speakers prior to the invasion and continues to be regarded as Wiradjuri country today. This rich riverine environment contributed to a highly developed economy for the Wiradjuri and continues to nurture Wiradjuri lifeways (Macdonald 2004:22; Macdonald 1986:4).

The Wiradjuri language was essentially an oral tradition. However, combined with other forms of communication such as hand signals, subtle body language and signs/symbols engraved or painted on surfaces within the landscape, on possum skin cloaks and human bodies, a very rich and detailed method of communication was developed (Green 2002:63). The spoken language is rich in vocabulary, grammar and structure with its own sounds and words (Grant & Rudder 2001). As with law and spirituality, language carries the culture of the Wiradjuri. They merge into one to provide the basis for communication, group cohesion,



identity and security. According to the ethnographer, R. H. Matthews (1896) the Bogan River Wiradjuri spoke a dialect of the Wiradjuri language called “Wonghibon”, whilst “the Castlereagh, the Mole and the Barwan” Wiradjuri spoke “Wailwan”.

Despite sharing a language, the Wiradjuri were not a single political unit ruled by a Chief. Rather, they were a confederacy of clans or family groups who shared a language, albeit with some local differences or dialects as detailed above, and a system of common beliefs. Politics operated at a local level and was informed by local senior men and women who had developed a broad and extensive range of skills and cultural knowledge. “Clever” men or women were those skilled in ritual knowledge and practices who would have been respected over a wide area but they were not Chiefs (Macdonald 2004). Leadership of a particular activity was undertaken by the person most qualified, such as the best speaker or warrior. As people’s expertise and reputations increased with age, they may have exerted influence over a broader area of networks cultivated throughout their life (Macdonald 2004:22). Descent passed through the female line with a “two moiety matrilineal social system” (Read 1983:8), that is, a person’s totem was different to their mother, but the same as their grandmother (Read 1983:8).

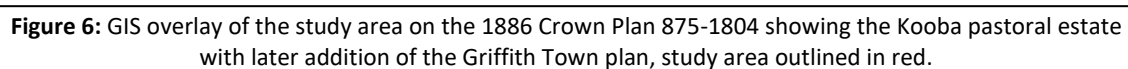
The Wiradjuri language speakers lived in family groups of husband and wife (or wives), their children and grandparents, adult sons and their wives and children. They were part of a larger autonomous clan group who had rights over a defined area or “home territory” within the broader Wiradjuri country. This was usually near permanent water (Matthews 1906:941; Read 1983:6; Pearson 1987:86). Each clan often identified themselves by the river around which they camped and which provided sustenance. Individuals would identify themselves as a “Boganer”, a “Lachlan woman” or from the Murrumbidgee (Macdonald 2001:2). Three major clans were recorded by Mathews (1906:941) as centring on Wellington, Mudgee-Rylstone and Bathurst. Howitt (1904:56) recorded three major clans at Narrandera, “Kutu-mundra” (now Cootamundra) and “Murring-balla” (now Murrumburrah). The Land Commissioner for the Lachlan region described three major clan groups on the south bank of the Lachlan, on the north bank of the Murrumbidgee and on the Booroowa River (Beckham 1853). Other clans included the Lachlan clan to the south-west of the Bathurst-Mudgee area, the Lower Macquarie clan to the north west, the Castlereagh clan to the north, and the Bogan clan to the west (Pearson 1984:66). The clan territories were estimated to contain a radius of approximately 40-48km (Mathews 1906:941; Pearson 1987:86). Each of these clans divided into smaller family groups for every day food procurement and living (Howitt 1996:208-2011).

Traditionally, these small self-contained family groups used the river flats and waterways as travelling routes to access resources on a seasonal basis. Their land provided all their economic and spiritual nourishment. It contained the water and food resources, shelter and the sacred sites necessary to their religious and ceremonial life. Small bough shelters were constructed for protection from the elements and used by family groups whilst travelling. They contained a simple frame of boughs or saplings placed upright in the ground in a semi-circular shape. The upper sections were tied together and covered with leaves, bark or grass (Kabaila 1999:120). Huts made of sheets of bark attached to timber supports were observed in the Yass area. A small fire was lit near the entry to these shelters for heating and cooking and wind breaks were erected (Green 2002:57-58). Evidence of Wiradjuri occupation can still be seen in the form of open artefact scatters, scarred and carved trees, hearths and bora grounds (AHIMS).

Availability of water and resources dictated movement, the location and intensity of occupation camps. The large rivers were the prime camping locations, however, wetlands provided good food resources and fresh water, whilst springs at various locations were suitable for localised seasonal camps. Rock holes also provided water as did “puddled stumps”, where a tree stump was hollowed out by fire and lined with clay and layered with small stones, to hold water. Boughs, bark or hollowed tree logs were placed into both the rock holes and puddled stumps to direct water into them (Gilmore 1935:36; Green 2002:72).

Wiradjuri food economy was focused on rivers, swamps, forests and their hinterlands. As Wiradjuri occupation was therefore centred on the major rivers, the Wiradjuri became known as “the river people”. Their procurement strategy was based on adaptive stability, determined by a deep knowledge of nature and countryside, and a careful approach to hunting and collecting. There is abundant evidence for advanced economic practices such as harvest rotation to ensure continuous supply of food, which also guaranteed a varied diet. Wiradjuri country was recognised by natural features which defined the boundaries and by spiritual sites which were associated with their ancestors (Comber 2019:10-15)

The first encounters of Europeans on Wiradjuri country occurred during the expeditions of explorers George Evans in 1813 (Turpin 1913), John Oxley in 1917 (Oxley 1964), Hamilton Hume and William Hovell in 1824 (Bland 1965), Charles Sturt in 1828-9 (Sturt 1982) and Thomas Mitchell 1835-1845 (Mitchell 1893). In the 1830s full-scale non-Aboriginal expansion commenced into Wiradjuri lands and was gradually taken over by farms, cattle stations and pastoral estates which moved down the river corridors. The second half of the 19th century was a time of great expansion into Wiradjuri country with almost every hectare being alienated (Comber 2019), including the study area which was located in the northern portion of the Kooba pastoral holding that housed an out-station widely referred to as Jondaryan.





As a result of colonisation *The Aborigines Protection Act 1909* was introduced to contain and control Aboriginal people, which was finally rescinded in 1960. This Act established a number of managed and unmanaged Reserves on to which Aboriginal people were forcibly moved onto. The nearest reserve to Griffith was at Darlington Point. Other reserves include Erambie Reserve near Cowra, Euabalong Reserve, Warangesda and Cumeragunja (Comber 2019:48-49). The table below provides further details:

Name	Location/s	Period of occupation	Characteristics
Warragesda	Darlington Point	1879-1924	Established as an 'Aboriginal Station' by John Gribble, later converted to a mission managed by the Aborigines Protection Board'. Appearance of a small village with a church.
Darlington Point Reserve	-	1924-1950s	After the dissolution of Waragesda people from the mission and people from other places camped together along the banks of the nearby Murrumbidgee river. Fibro shacks and corrugated iron houses with fibro floors and a small church were constructed.
Wattle Hill, Leeton	1.8 km west of Leeton Cannery	1940s-1960s	Former cannery workers' fringe camp. After the end of WWII it was occupied extensively by Wiradjuri people. Four streets of corrugated iron and bag huts. Bulldozed ahead of development in 1968.
Griffith Town camps	The Pines Old Tip Golf Course Scenic Hill Wakaden Street Tharbogang Condo lane The Willows	1940s-1970s	Series of shanty towns made up of humpies and bag huts of seasonal workers throughout Griffith.
Frogs Hollow Marsh	Western edge of Griffith	1940s-1990s	Camp made of bag huts and tin humpies established during the labour shortages of WWII. Although shacks were pulled down in 1959 the area was populated by people into the 1990s.
Three ways	Adjacent to Frogs Hollow Marsh	1954-1980s	Five acres of land set aside as Aboriginal reserve. After the demolition of Frogs Hollow Marsh people moved to Three ways. Housing scheme for Aboriginal people developed in the 1960s, comprising houses and tin huts; sewage since the 1970. Redeveloped as subdivision in the 1970.

Table 1: Detail of Aboriginal Reserves and settlements in the Griffith Area in the 20th century (Kabaila 2004: 34)

It is clear that the lives of people who had lived according to traditional ways in this area were catastrophically altered by European occupation and settlement over a century. Through perseverance and showing great resilience Aboriginal Australians including Wiradjuri descendants retained some of their core traditions, customs and beliefs, passing them onto future generations despite the significant changes imposed on their lives. In the 2016 Census, Griffith's population numbered 18,874. Aboriginal and/or Torres Strait Islander people made up 5.0% of the population. (2006 Census Stats www.abs.gov.au).

Wiradjuri people are represented by the Wiradjuri Council of Elders and each community has established their own form of governance to represent local interests. The Griffith Local Aboriginal Land Council represents the people in and around Griffith.



4.0 ENVIRONMENTAL CONTEXT

4.1 Topography, geology, soils and ecology

The study area is located within flat modified terrain in the fully developed town centre of Griffith NSW, approximately 700m south of the McPhersons Range/Scenic Hill Reserve. The present-day town is situated within the Cocoparra geological group, the local topography being characterised by flat to gently undulating plains of red and brown clayey sand, loam and lateritic soils. The underlying lithology is part of the Ravendale Terrestrial Basin and includes typical features such as the Rankin Formation, Mailman Gap Conglomerate Member, Womboyne Formation, Jimberoo Member, Melbergen Sandstone Member, Confreys Shale Member, Naradhan Sandstone, Barrat Conglomerate (Wynn 1977). Typical unmodified soil profiles within the study area would have comprised a 0-35 cm deep A horizon of red to yellowish clay sands to sandy clays overlying up to 1.6 m deep B horizons of medium clays (NSW Soil and Land 2020). Aboriginal objects within the study area would be concentrated within the A horizon soils.

The study area is located approximately 30 km north of the Murrumbidgee River and approximately 8km west and north of Mirrool Creek, the largest permanent water source in the local area. Several ephemeral creek lines descending from the McPhersons Range/Scenic Hill Reserve are to be found approximately 700m north of the study area.

The study area has been cleared of endemic vegetation. Original vegetation communities throughout the study area have been identified as Inland Riverine Forests characterised by *Eucalyptus camaldulensis* (river red gum), occasionally with *E. largiflorens* (black box), *E. meliodora* (yellow box) or *E. macrocarpa* (grey box). The understorey would have comprised various shrubs and herbs and ferns (Keith 2006:230-231). These vegetation communities provide habitat for a variety of animals such as kangaroos, wallabies, sugar gliders, possums, various lizards, snakes and birds – species hunted by past Aboriginal people as sources of food and raw materials for clothing, ornamentation, tools and implements (Attenbrow 2010).

4.2 Current land use and disturbance

Historic land modification of the study area possibly dates to the 1850s. The land was most likely cleared and used for grazing. The area surrounding the study area was described as 'Dense pine forest' by the 1886 Crown Plan 875-1804 (Figure 7), which may have referred to reforestation for logging.

Since the construction of the Griffith Base Hospital in the 1930s the study area has been actively developed and landscaped (Photograph 1). It is currently occupied by the buildings, carparking and landscaping of the Griffith Base Hospital. Whilst the development of the hospital has led to extensive development which has contributed to alterations to the original landscape, as most of the buildings on the site lack basements, the impact on Aboriginal archaeology would be minimal. Built areas in the central, northern and north western part of the study area demonstrate potential for introduced fill used for levelling of the respective construction sites which is likely to have capped and therefore protected remnant A horizon soils containing Aboriginal archaeological deposits.



Photograph 1: Aerial photograph of the Griffith Base Hospital
(www.mlhd.health.nsw.gov.au)



5.0 ARCHAEOLOGICAL CONTEXT

5.1 Regional

A search of the Aboriginal Heritage Information System (AHIMS) for the broader Griffith region indicated that only a small number of assessments had been undertaken within the region resulting in only a few sites being recorded. It should be noted that the small number of sites registered with AHIMS is a result of this lack of assessment, not a lack of potential Aboriginal archaeological sites.

Approximately 300km to the north east of Griffith at Cowra a large artefact scatter was recorded in respect of an extension to the Cowra sewerage treatment plant. Salvage excavations were undertaken and 34 artefacts retrieved (Comber & Stening 2009)

A ceremonial ground (Site 43-1-4) for which a report could not be located has been recorded near the town of Condobolin on a hill behind the hospital. It is described as consisting of about 120 low heaps of stones about 2m in diameter and 3-40cm in height. Condobolin is approximately 200km to the north of the study area.

Burials have been uncovered approximately 200km to the north of the study area near Condobolin. Webb (1986) undertook the investigation of a sand dune approximately 400m south of the Lachlan River. His investigation which resulted from the exposure of human remains from sand mining revealed the presence of human skeletal remains in association with artefactual material. Analysis indicated that this burial site may possibly date from the early Holocene. The fourteen artefacts located in association with the burials included a ground edged hatchet made from a river pebble, quartzite flakes and chert flakes and a chert blade. This site became known as "Hall's Burial" (after the then property owner) and is numbered 43-1-6 (AHIMS).

Another burial site is recorded at Goobang. It is a fenced protected area accessed from the North Forbes Road and located on Goobang Creek known as the "Goobang Burial site". A report relating to this site could not be located in the open section of the AHIMS. However a report by R Wright dated 1997 and titled "Report on Human Skeletal Remains from Condobolin in New South Wales", and a report titled "Aboriginal burials on the riverine plain of NSW" by T Bonhomme (1987) may relate to this site. Both of these reports were held in the restricted section and the consultant did not access them. Site No. 43-1-7 (Hacketts Burials, Goobang Creek, Condobolin) registered on the AHIMS relate to these reports. The site recording form records 43-1-7 as a site containing at least two burials located 4km from Condobolin on the Old North Forbes Road.

5.2 Griffith

A number of sites have been recorded in the vicinity of Griffith. An open campsite has been recorded at Narrandera which is only approximately 80km to the south east of Griffith. Approximately 10km to the north at Lake Wyangan and Tharbogang Swamp nine artefact scatters and six scarred trees have been recorded. To the east of Tharbogang Swamp another eight artefact scatters have been recorded. Four sites have been recorded at Yoogali which is approximately 6km north-east of Griffith. These consisted of two isolated finds and two artefact scatters which were subsequently collected as part of the State Significant Development of the Riverina Solar Project (RPS 2016a & b).

Within three kilometres of the study area the following sites have been recorded and are shown on Figure 7:

AHIMS No. and Name	Site Type
49-2-0013: Griffith Scenic Hill Reserve	Open artefact scatter
49-2-0161: Scrubby 3	Scarred Tree
49-2-0162: Scrubs ft 1	Scarred Tree
49-2-0163: Mulga ft 8	Scarred Tree
49-2-0164: Mulga ft 6	Hearth
49-2-0157: Mulga ft 1	Hearth
49-2-0158: Mulga ft 5	Scarred Tree
49-2-0158: Mulga ft 4	Hearth
49-2-0160: Road Tank 2	Hearth

Table 2: AHIMS sites within 3km of the study area

Hearths, artefact scatters and scarred trees are the most common types of Aboriginal sites in proximity to the study area. The distribution of Aboriginal sites does not provide a detailed understanding of Aboriginal occupation within the region. Rather, it represents the heritage assessment that have been undertaken prior to development. This lack of registered Aboriginal sites or places within the study area is due to the lack of assessments, rather than the lack of sites. It is possible that further unrecorded Aboriginal sites are present within and closer to the study area. However, despite the lack of assessments a number of Aboriginal sites have been recorded in the vicinity of the study area within a variety of environmental contexts. This indicates the possibility for evidence of subsurface Aboriginal objects to exist within the study area.

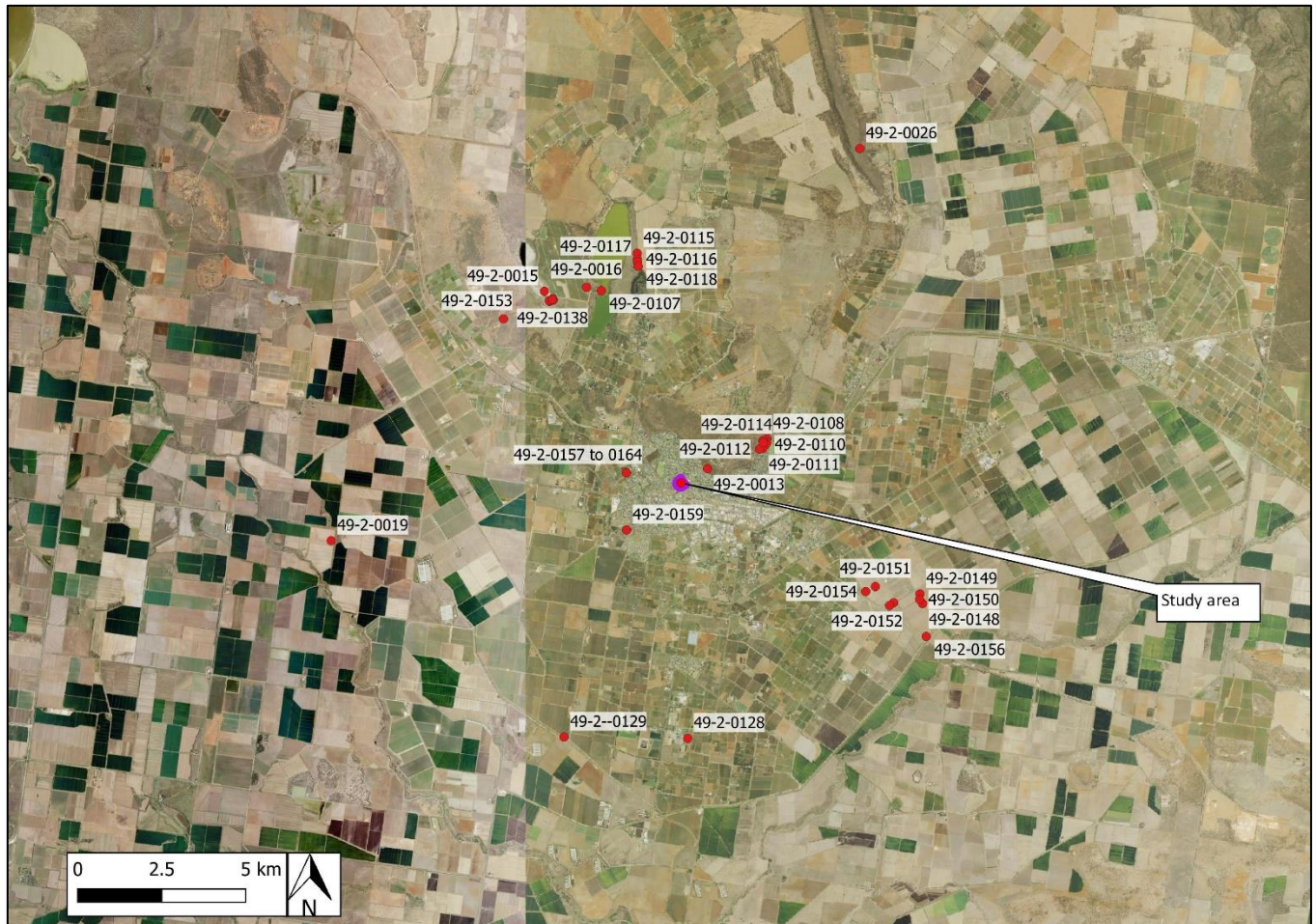


Figure 7: Location of AHIMS sites within the vicinity of the study area

5.3 The study area

There are no registered Aboriginal sites within the study area and the study area is not an Aboriginal place.



6.0 CONSULTATION

Table 1 summarises the consultation undertaken in accordance with *Aboriginal cultural heritage consultation requirements for proponents 2010*. The letters and emails are attached at Appendix A.

Table 1: Consultation undertaken in accordance with *Aboriginal cultural heritage consultation requirements for proponents 2010*.

Step	Task Requirement	Action	Date of action	Outcome
4.1.1	Identify if native title exists in relation to the project area.	We undertook a search in Native Title Vision	9/12/2019	No Native Title Claims over the study area and no ILUAS
4.1.2	<p>Ascertain, from reasonable sources of information, the names of Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places.</p> <p>Compile a list of Aboriginal people who may have an interest for the proposed project area and hold knowledge relevant to determining the cultural significance of Aboriginal objects and/or places</p>	<p>We wrote to the following organisations seeking the names of any Aboriginal people or organisations who may hold cultural knowledge:</p> <ul style="list-style-type: none"> Griffith Local Aboriginal Land Council Griffith Shire Council Riverina Local Land Services (RLLS) Department of Planning, Industry and Environment Office of Registrar, Aboriginal Land Rights Act 1983 NTS Corporation 	9/12/2019	<p>Griffith Shire Council responded with contacts of potential stakeholders;</p> <p>DPIE responded with contact of Griffith LALC</p> <p>RLLS advised to contact Griffith LALC</p> <p>NTS advised there are no Registered Aboriginal Owners (RAOs) for the study area</p>
4.1.3	<p>Written notification and advertisement:</p> <p>Write to the Aboriginal people whose names were obtained in step 4.1.2 and the relevant LALC(s) to notify them of the proposed project.</p> <p>Place a notice in the local newspaper circulating in the general location of the proposed project, explaining the project and its exact location.</p> <p>Notification by letter and newspaper must include:</p> <p>(a) the name and contact details of the proponent</p> <p>(b) a brief overview of the proposed project that may be the subject of an application for an AHIP, including the location of the proposed project</p> <p>(c) a statement that the purpose of community consultation with Aboriginal people is to assist the proposed applicant in the preparation of an application for an AHIP and to assist the</p>	<p>We wrote to the following organisations/people identified in 4.1.2</p> <ul style="list-style-type: none"> Griffith LALC Dyirri-Bang-Gu Aboriginal Aged Care Service Corporation Aboriginal Community Working Party James Ingram Damien Kennedy Steve Meredith Ethan Williams <p>An advertisement was placed in The Area News</p>	<p>19/12/2019</p> <p>3/01/2020</p>	<p>No written responses were received.</p> <p>At a meeting on 4th Decembewr 2019 with Steve Collins, Acting CEO of the Griffith Local Aboriginal Land Council, Steve registered an interest on behalf of the GLALC</p>



Step	Task Requirement	Action	Date of action	Outcome
	<p>Director-General of OEH in his or her consideration and determination of the application</p> <p>(d) an invitation for Aboriginal people who hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) in the area of the proposed project to register an interest in a process of community consultation with the proposed applicant regarding the proposed activity</p> <p>(e) a closing date for the registration of interests</p>			
4.1.4	A minimum of 14 days from the date the letter was sent or notice published in the newspaper to register an interest.	Closing date for registration of interest included in the notification letters and notice in the newspaper was at least 14 days from the date the letters were sent and notices appeared in the newspapers.		<p>Closing date for registration in the invitation letter was 16/01/2020</p> <p>Closing date for registration in the newspaper notice was 17/01/2020</p>
4.1.5	Must advise Aboriginal people who are registering an interest that their details will be forwarded to DPC and the LALC unless they specify that they do not want their details released.	RAP's informed by letter email 19/01/2020 and by advertisement dated 03/01/2020.		No written responses were received.
4.1.6	<p>Make a record of the names of each Aboriginal person who registered an interest.</p> <p>Provide a copy of that record and copy of the notification from step 4.1.3 to the relevant DPC and LALC within 28 days of closing date for registration of interest.</p>	List of RAP's compiled.	19/02/2020	DPIE and GLALC advised that there are no Registered Aboriginal Parties on this project. Written registrations had not been received at this stage, however, the GLALC did register an interest at the meeting of 4 th December 2019 and in writing on 9 th March 2020.
4.1.7	LALCs holding cultural knowledge relevant to determining the significance of Aboriginal objects and places in the proposed project area who wish to register an interest to be involved in consultation must register their interest as an Aboriginal organisation rather than individuals.			Griffith LALC registered an interest.
4.1.8	Where an Aboriginal organisation representing			Steve Collins, Acting CEO was initially the nominated contact person. However, by



Step	Task Requirement	Action	Date of action	Outcome
	<p>Aboriginal people, who hold cultural knowledge has registered an interest, a contact person for that organisation must be nominated.</p> <p>Aboriginal cultural knowledge holders who have registered an interest may indicate they have appointed a representative to act on their behalf. Where this occurs, the registered Aboriginal party must provide written confirmation and contact details of those individuals to act on their behalf.</p>			email dated 10 th March 2020 Stephen Young, Acting CEO, was nominated as the contact person.
4.2	Presentation of information about the proposed project.	Information was provided to Steve Collins Acting CEO at meeting in Griffith. He was shown maps and provided with all details about the project.	4/12/2019	<p>Steve Collins advised that the site was significant and that he would like to see archaeological testing and salvage undertaken.</p> <p>He advised that the upgrade of the hospital was important but that the community had concerns about the protection of Aboriginal cultural heritage.</p>
4.3.1-4.3.2	Notification of proposed assessment methodology	Methodology sent to all RAPs. Methodology was also discussed with Steve Collins at meeting on 4/12/2019	3/02/2020	Methodology sent by email to GLALC and written response received on 10 th March
4.3.3	Gathering information about cultural significance	Cultural significance was discussed with Steve Collins at meeting of 4/12/2019.	4/12/2019	He advised that the community had recently held a meeting about the hospital and that the site held cultural significance to the community. Burials, artefacts and scarred trees were located in the vicinity and they believed that the hospital site could contain sub-surface evidence of occupation
4.4	Review of draft cultural heritage assessment report	Draft ACHAR sent to GLALC	09/03/2020	The draft ACHAR was sent to the GLALC who provided a written response on 10/03/2020 in support of the ACHAR, methodology and recommendations.
	Archaeological testing		5/5/2020 to 14/5/2020	Archaeological testing was undertaken and this report was updated to include the results and the testing report is appended at Appendix C.
	ACHAR update		18/6/2020	ACHAR updated to include results of testing.
	Testing report sent to GLALC for comment		<p>Report sent 17/6/2020</p> <p>Letter received 23/7/2020</p>	Letter from GLALC in support of salvage and interpretation – plus indicating that they would like control of the artefacts. Letter attached to test excavation report.



As a result of the above consultation and testing:

- The Griffith Local Aboriginal Land Council is the only Registered Aboriginal Party
- No culturally sensitive information was identified.
- No confidential requirements were identified.
- The artefacts retrieved during the testing will be delivered to the Griffith Local Aboriginal Land Council.



7.0 ARCHAEOLOGICAL TESTING

The Griffith Base Hospital is being redeveloped. The need for the redevelopment is to improve efficiencies across the hospital, improve infrastructure and address the changing models of healthcare to meet future growth and demand. Archaeological testing was undertaken across the hospital site in accordance with the *Code of Practice for Archaeological Investigations in NSW*. A report was prepared detailing the results of the testing and the following is a summary. For full details please see the testing report attached at Appendix C.

The proposed redevelopment will involve extensive impact to the study area. The proposed works will involve extensive ground disturbance including, but not limited to:

- Demolition and clearing
- Cut and fill
- Construction of buildings
- Construction of service infrastructure

To ensure the best practice management of the Aboriginal archaeological and cultural heritage, Health Infrastructure NSW commissioned Comber Consultants to undertake an Aboriginal archaeological assessment and archaeological test excavations across the site in consultation with the Aboriginal community. The aim of the testing was to confirm the presence of Aboriginal objects and their nature and extent. The results of the testing will assist in informing future management strategies. The testing was undertaken in association with the Griffith Local Aboriginal Land Council who participated fully in the program of test excavations.

The testing uncovered Aboriginal objects across the Griffith Base Hospital site with higher density of artefacts located within the southern portion of the hospital grounds in PADs 1 and 2. The hospital has been registered on the Aboriginal Heritage Information System as AHIMS 49-2-0180.

It appears that some of the Aboriginal objects were transported to the site within gravels that were used for landscaping purposes. However, of significance are the Aboriginal objects recovered from *insitu* subsurface deposits. This demonstrates Aboriginal occupation of multiple locations within the hospital site. The *insitu* deposits recorded within PADs 1 and 3-5 indicate that the site was occupied by Aboriginal people prior to European settlement. Additionally, the lithic deposits within the gravels provides an example of the type of artefacts to be found within the Griffith region. This is particularly important because of the paucity of archaeological investigations undertaken within the region. These artefacts contribute to an understanding of Aboriginal occupation of the region and the nature of Aboriginal tool making.

In addition, these artefacts are very important to the Aboriginal community as evidence of their occupation providing links to their ancestors. The GLALC have indicated that they would like the remainder of the artefacts retrieved from PADs 1 and 2 and would like to obtain the artefacts for display and educational purposes.

This program of test excavation only uncovered a portion of the artefacts on the site. As it is an offence to harm Aboriginal objects it will be necessary to apply for an Aboriginal Heritage Impact Permit with salvage to allow removal of the artefacts from PAD 1 and 2 prior to the redevelopment of the site. Due to the services within PADs 3-5 no further excavation is recommended within these areas. The maximum amount of excavation that could be undertaken safely within PADs 3-5 was undertaken and the maximum amount of artefacts retrieved.

It should be noted that only PAD 5 is within the SSDA boundaries and no further testing or salvage is required for PAD 5. PADs 1-4 were located within the area of the early works which was approved under a separate planning pathway. Separate planning approval and an AHIP has been issued for the salvage of PADs 1 and 2 (salvage not required for PADs 3-5).

It is important that interpretation of these artefacts and the Aboriginal history of the region be undertaken. An interpretation strategy and plan should be developed to provide an exciting and innovative interpretation program at the hospital. It is important that this significant Aboriginal history is recorded and interpreted to the public. This should be undertaken in partnership with the Griffith Local Aboriginal Land Council.



8.0 CULTURAL HERITAGE VALUES AND STATEMENT OF SIGNIFICANCE

8.1 Preamble

Significance assessment is the process whereby sites or landscapes are assessed to determine their value or importance to the community.

A range of criteria have been developed for assessing the significance which embody the values contained in the Burra Charter. The Burra Charter provides principles and guidelines for the conservation and management of cultural heritage places within Australia.

Following are the criteria which will be used to assess the significance of the Griffith Base Hospital study area.

8.2 Criteria

Social Value (sometimes termed 'Aboriginal' value) which refers to the spiritual, traditional, historical or contemporary associations or attachments which the place or area has for the present-day Aboriginal community.

Historic Value refers to the associations of a place with a person, event, phase or activity of importance to the history of an Aboriginal community.

Scientific Value refers to the importance of a landscape, area, place or object because of its potential to provide information which is of value in scientific analysis and the ability to answer scientific or technical research questions.

Aesthetic Value refers to the sensory, scenic and creative aspects of the place.

Representativeness refers to whether the site demonstrates the principal characteristics of that site and is a good representative example of that site type.

Rarity refers to the degree to which such as site is known elsewhere and whether the site is uncommon, rare or endangered.

8.3 Assessment

Social Value

Consultation with representatives of the Aboriginal community indicates that the study area is important to the local and broader Aboriginal community. The artefacts retrieved during test excavation provide evidence of Aboriginal occupation representing their past, providing a direct link to their ancestors, and a continued connection to country and culture. The artefacts represent one of few tangible social links available in the increasingly developed Griffith landscape, and contain high social value for the Aboriginal community.

Historic Value

The study area exhibits historic value as part of the history of Aboriginal people from before European occupation through to contact and dispossession. Retrieval of Aboriginal artefacts during test excavation confirms the presence of Aboriginal occupation and resource use within the region.

Scientific Value

The majority of artefacts retrieved have been deposited with local pebbles used as aggregate and are therefore not in their original context. The artefacts from PAD 4 appear to be an *insitu* deposit of a remnant site. Given the absence of archaeological investigation within the Griffith region, any archaeological excavation would contribute to the scientific understanding of Aboriginal occupation of the area. As such, the study area has the potential to yield further information through detailed scientific and archaeological research into the nature of Aboriginal occupation and techniques utilised in subsistence activities. In particular, the assemblage contains many bipolar artefacts that have scientific value.

Aesthetic Values

The study area has been modified since settlement so no longer contains aesthetic values related to Aboriginal use and occupation. The Aboriginal objects themselves have aesthetic value as examples of a stone tool assemblage from the area, as well as toolmaking techniques, in particular bipolar artefact manufacture, within the Griffith region.

**Representative Values**

The majority of artefacts were recovered from disturbed terrain and do not provide a good representative example of an Aboriginal site or cultural landscape. However, the Aboriginal objects are representative of bipolar tool making techniques.

Rarity Values

The archaeological assemblage retrieved from Griffith Base Hospital is rare due to the paucity of archaeological investigations undertaken within Griffith and the wider region.

8.4 Statement of Significance

Consultation with representatives of the Aboriginal community indicates that the study area is important to the local and broader Aboriginal community. The artefacts retrieved from the Griffith Base Hospital provide evidence of Aboriginal occupation within the Griffith region, representing their past, providing a direct link to their ancestors, and a continued connection to country and culture. The artefact assemblage contains value as an example of stone tool making, in particular using the bipolar technique. The study area has the potential to yield further information through detailed scientific and archaeological research into the nature of Aboriginal occupation and techniques utilised in subsistence activities. This is particularly significant due to the paucity of Aboriginal archaeological investigations undertaken within Griffith and the wider region generally.



9.0 AVOIDING AND MINIMISING HARM

It will not be possible to avoid harm in the development of the Griffith Base Hospital. Existing buildings will be demolished and new buildings constructed. The nature of works will involve extensive ground disturbance making it impossible to avoid harm. The work is essential as the hospital is aging.

However, archaeological salvage was undertaken which gained a substantial amount of information about the Aboriginal archaeology and heritage of the study area. The testing has ensured that the maximum amount of information about Aboriginal occupation and activities on the site have been gained. The archaeological information has been analysed and compared with other sites within the Riverina region to contribute to an understanding of the archaeology of Griffith and to add to the body of knowledge gained from previous archaeological excavations in New South Wales. Obtaining this information will protect Aboriginal cultural heritage values by allowing dissemination of that information to the Aboriginal and broader community.

In respect of the principles of Ecologically Sustainable Development, the information gained from the program of testing will contribute to our knowledge and understanding of Aboriginal occupation within the Griffith area. This knowledge can then be passed down to future generations through education programs and interpretation.

The testing has demonstrated that sufficient archaeological information has been gained and that salvage within the boundaries of the State Significant Development area is not required.

Salvage was undertaken on another portion of the hospital site, but that was undertaken under a separate planning approval.



10.0 RECOMMENDATIONS

The following recommendations are made on the basis of:

- Legal requirements under the terms of the *National Parks & Wildlife Act 1974* (as amended), which states that it is an offence to harm or desecrate an Aboriginal place or object without first gaining a permit under Part 6 of the *National Parks & Wildlife Act 1974*.
- Consultation with the Registered Aboriginal Parties as detailed in this report.
- Research into the environmental and archaeological background of the study area and its surroundings, as detailed in this report.
- Results of the assessment and test excavations as outlined in this report.

IT IS THEREFORE RECOMMENDED THAT:

1. No further archaeological assessment, monitoring, testing or salvage is required within the boundaries of the State Significant Development area. Sufficient information has been gained from the program of testing previously undertaken.
2. Consultation with the Griffith Local Aboriginal Land Council should continue.
3. Interpretation of the archaeology, Aboriginal history of Griffith and the site of the Griffith Base Hospital should be included in the redevelopment of the hospital site. This could include story boards, installations and artwork. An interpretation strategy and plan should be developed to guide this interpretation.
4. If any previously unexpected or undetected Aboriginal objects are uncovered during the proposed hospital redevelopment, all works should cease in the vicinity of that object and further advice sought from the consultant.



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GLOSSARY

Adze: an axe like bifacial tool with a bevelled bit or blade edge usually used to work wood, or sometimes to dig for root crops.

Alluvium: material which is transported by a river and deposited at points along the flood plain of the river.

Artefact: any object made by human agency. All lithic tools and lithic debitage are considered artefacts.

Artefact scatter: also known as a surface scatter or open site, where prehistoric material such as artefacts and waste debris are lying exposed on the surface of the ground.

Assemblage: a collection of artefacts from an archaeological site.

Australian small tool tradition: a mid Holocene tool industry that appeared about 5,000 years ago when a new ensemble of small, flaked stone tools began to come into use. The types consisted of backed blades and flakes, Unifacial and bifacial points, and small adze flakes. There are some regional distributions of tools, including Bondi points, geometric microliths, Pirri points and Tula adzes.

Axe: a stone artefact that has been ground on one or more sides to produce a sharp edge.

Backed blade: a blade flake that has been abruptly retouched along one or more margins opposite an acute (sharp) edge. Backed pieces include backed blades and geometric microliths. They are thought to have been hafted onto wooden handles to produce composite cutting tools or spears. Backed blades are a feature of the “Australian small tool tradition”, dating from between 5,000 and 1,000 years ago in south eastern Australia (Mulvaney 1975).

Bifacial flaking or retouch: when flakes have been removed from two opposing faces.

Biomantle: the upper part of soil produced by biodynamical agents and processes of which bioturbation is normally hierarchically dominant. By definition, it contains at least 50% biofabric, a condition met in essentially all topsoils.

Bioturbation: the alteration of a site by non-human agency, eg. burrowing animals, tree and grass roots, insects

Blade: a flake that is at least twice as long as it is wide.

Bondi point: a small, asymmetric backed point, named after Bondi Beach where it was first found, which is a component of the Australian small tool tradition. It is usually less than 5cm long and is sometimes described as a backed blade.

Broad platform flake: a flake which has a platform which is as wide as, or wider than, the body of the flake.

Bulb of percussion: a rounded bulge where the force from the hammerstone has radiated through the stone and split it from the core.

Burin: a flake tool that was produced by the removal of two flakes at right angles to one another to produce a very fine sharp and durable edge.

Carved trees: trees which have had designs carved into the bark or heartwood and in some areas may have been used to mark burial or initiation sites.

Chert: a very fine crystalline aggregate of silica.

Context: the time and space setting of an artefact, feature or culture. The context of a find is its position on a site, its relationship through association with other artefacts, and its chronological position as revealed through stratigraphy. An artefact's context usually consists of its immediate matrix (the material surrounding it, eg. clay, gravel or sand), its provenience (horizontal and vertical position within the matrix), and its association with other artefacts (occurrence together with other archaeological remains, usually in the same matrix). The assessment of context includes study of what has happened to the find since it was deposited.

Core: a piece of stone bearing one or more negative (concave) flake scars. A stone which has obviously had flakes and flaked pieces struck from it.

Cortex: refers to the original weathered outer surface of the rock used to manufacture an artefact.

Debitage (debris): detached pieces that are discarded during the reduction process.

Distal end: the end opposite to the platform or the point end of a blade.

Dorsal surface: the ‘back’ of the artefact or the side that was once part of the outside of the core or shows evidence of previous flake removals.

Edge-ground artefact: an artefact (generally an axe or adze) whose cutting edges have been ground, rather than flaked, to form a sharp edge.



Errillure scar: the small flake scar on the dorsal side of a flake next to the platform. It is the result of rebounding force during percussion flaking.

Erosion: the wearing away or loosening and transportation of soil or rock by water, wind and ice.

Fabricator: a stone or bone artefact used in the manufacture of other tools. Often rod shaped and worn heavily on one end, it is used to chip flakes from a core, or to retouch a flake.

Flake: any piece of stone removed from a larger mass (core) by application of force (percussion), and having a striking platform and bulb of percussion.

Flaked piece: any stone struck from a larger mass by percussion but not containing all or any of the characteristics of a flake.

Focal platform flake: a flake which has a platform narrower than the body of the flake.

Grinding groove: a depression resulting from the sharpening of stone tools such as axes and adzes, usually located on surfaces of fine homogenous sandstone and near water.

Grinding stone: a thick stone used as a mortar for grinding seeds, roots, tubers, or ochre.

Hammerstone: the stone that is used to remove flakes from the core.

Holocene: that portion of geologic time that postdates the latest episode of continental glaciation. The Holocene Epoch is synonymous with the recent or postglacial interval of Earth's geologic history and extends from 10,000 years ago to the present day. It was preceded by the Pleistocene Epoch and is part of the Quaternary Period, a time characterised by dramatic climatic oscillations from warm (interglacial) to cold (glacial) conditions that began about 1.6 million years ago. The term Holocene is also applied to the sediments, processes, events, and environments of the epoch.

Horizon (or soil horizon): the layers of the upper crust of the earth. The top, or O, horizon is the layer of undecomposed litter; the A horizon is topsoil, where most roots grow; B is the subsoil; and C is the parent rock material, broken into chunks. Although some roots can penetrate into the C horizon, few microorganisms live there.

Isolated find: a single stone artefact found on the surface of the land not in association with any other artefact.

Knapping: the process of hitting one stone (core) with another (hammerstone) to produce a flaked artefact.

Lamellate flaked piece: thin and wedge shaped, similar to a flake, but without the diagnostic features of a flake. A lamellate may be the distal end of a flake which has had its platform broken off.

Lithic: anything made of stone. Derived from the Greek word meaning stone or anything pertaining to stone.

Manuport: piece of stone intended to be, or used as, a core that has been carried to the area from somewhere else.

Microlith: a small (1 – 3cm long) flake with evidence of retouch. Bondi points, scrapers and backed blades are all types of microliths.

Midden: a prehistoric refuse site chiefly composed of shell fragments.

Multidirectional core: a lithic mass (core) with evidence of flaking originating from more than one direction and with more than a single striking platform.

Negative flake scar: the scar left by the removal of a flake. The scar may also show a rounded depression which is the negative of the bulb of percussion.

Open site: also known as a surface or artefact scatter, where prehistoric material such as artefacts and waste debris are lying exposed on the surface of the ground.

Pirri point: a symmetrical leaf-shaped point, up to 7cm long, unifacially flaked all over its dorsal surface. The striking platform and bulb of percussion are sometimes removed to produce a rounded, thinned butt. Pirri points are a component of the Australian small tool tradition, found generally in inland Australia. The term pirri is an Aboriginal word for 'wood engraving tool'.

Platform: the flat surface which receives percussion or pressure in the removal of a flake or flaked piece.

Pleistocene: a geochronological division of geological time, an epoch of the Quaternary period following the Pliocene. During the Pleistocene, large areas of the northern hemisphere were covered with ice and there were successive glacial advances and retreats. The lower Pleistocene began about 1.8 million years ago; the Middle Pleistocene about 730,000 years ago; and the Upper Pleistocene about 127,000 years ago; it ended about 10,000 years ago. The Pleistocene was succeeded by the Holocene.

Potential archaeological deposit (PAD): any location considered to have a moderate to high potential for subsurface archaeological material

Potlid: small circular piece of stone that has literally "popped off" the surface of the artefact due to exposure to extreme heat.



Proximal end: the 'top' of the artefact, or the part that the knapper hit to remove it from the core, where the platform is expected to be.

Quarry: a location from which stone has been extracted in order to make stone artefacts.

Retouch: refers to the secondary working of an artefact after it has been struck from the core. Retouch is used to sharpen the edges. It is the intentional modification of a stone tool edge by either pressure or percussion flaking techniques.

Scarred trees: trees from which bark has been removed for the manufacture of everyday items such as containers, canoes or shields.

Scraper: a generalised term used to describe a flake tool that has a retouched edge angle of approximately 60 to 90 degrees.

Silcrete: silica-rich duricrust identified by the presence of complete granules or even pebbles within the matrix.

Stratigraphy: the study and interpretation of the stratification of rocks, sediments, soils, or cultural debris, based on the principle that the lowest layer is the oldest and the uppermost layer is the youngest. The sequence of deposition can be assessed by a study of the relationships of different layers.

Taphonomy: Literally, 'the laws of burial'. In archaeology, it is the study of the processes by which archaeological remains are transformed by human and natural processes during their incorporation into archaeological deposits, their subsequent long-term preservation within those deposits, and their recovery by archaeologists. The aim is to understand the processes resulting in the archaeological record.

Thumbnail scraper: a small flake with a convex scraper edge, shaped like a thumbnail and located opposite the flake's platform. They exhibit unifacial retouch (usually on the ventral surface) and are usually less than 30mm in length.

Transect: an arbitrary sample unit which is a linear corridor of uniform specified width. A straight line or narrow sections through an archaeological site, along which a series of observations or measurements is made.

Tuff: a rock formed of volcanic fragments (generally ash).

Typology: a scheme to order multiple types in a relational manner. A common typology orders types in a hierarchical manner.

Unidirectional core: a core with only one striking platform surface and with flake scars extending in only one direction.

Unifacial flaking or retouch: where flakes have been removed from one face only.

APPENDIX A: CONSULTATION

Written Notification (Step 4.1.2) 27/06/2019 sent to the following:

- NTS Corp
- DPIE regional office
- Registrar, Aboriginal Land Rights Act
- Native Title Tribunal (search undertaken of NNT)
- NTSCorp
- Riverina Local Land Servicer
- Griffith Local Aboriginal Land Council
- Griffith City Council

From: Dragomir Garbov

Sent: Monday, 9 December 2019 3:47 PM

To: 'westernregion@planning.nsw.gov.au' <westernregion@planning.nsw.gov.au>

Cc: Jillian Comber <jillian.comber@comber.net.au>

Subject: Attn: Heritage / Griffith Base Hospital Aboriginal Cultural Heritage Assessment Notification

Good afternoon,

Griffith Hospital Redevelopment

Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010

NSW Health proposes the redevelopment of the Griffith Hospital (please see map attached). The proposal will be determined as a State Significant Development (SSD) and it may be necessary to undertake archaeological excavation.

Comber Consultants have been engaged to undertake Aboriginal community consultation in accordance with Department of Planning, Industry and Environment's (DPIE's) *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. Therefore, I am writing to you to ascertain if you are aware of Aboriginal people or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and or/places within the study area. If so, I would be pleased if you could forward their contact details to me.

I would be pleased if you could forward your response by 13 January 2020 to:

Dr Dragomir Garbov
Comber Consultants
76 Edwin Street North
Croydon, NSW, 2132
dragomir.garbov@comber.net.au
Ph: (02) 9799 6000
Mob: 0448 464 768
Fax: (02) 9799 6011

Thank you for your assistance.

DR DRAGOMIR GARBOV

ARCHAEOLOGIST

HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132

M 0448 464 768 F (02) 9799 6011

E dragomir.garbov@comber.net.au

From: Dragomir Garbov
Sent: Monday, 9 December 2019 11:33 AM
To: griffalac@bigpond.com
Cc: Jillian Comber <jillian.comber@comber.net.au>
Subject: Griffith Base Hospital Aboriginal Cultural Heritage Assessment

Dear Madam/Sir,

Griffith Hospital Redevelopment
Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010

NSW Health proposes the redevelopment of the Griffith Hospital (please see map attached). The proposal will be determined as a State Significant Development (SSD) and it may be necessary to undertake archaeological excavation.

Comber Consultants have been engaged to undertake Aboriginal community consultation in accordance with Department of Planning, Industry and Environment's (DPIE's) *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. Therefore, I am writing to you to invite you to register interest in consultation and to ascertain if you are aware of Aboriginal people or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and or/places within the study area. If so, I would be pleased if you could forward their contact details to me.

I would be pleased if you could forward your response by 13 January 2020 to:

Dr Dragomir Garbov
Comber Consultants
76 Edwin Street North
Croydon, NSW, 2132
dragomir.garbov@comber.net.au
Ph: (02) 9799 6000
Mob: 0448 464 768
Fax: (02) 9799 6011

Thank you for your assistance.

DR DRAGOMIR GARBOV
ARCHAEOLOGIST
HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132
M 0448 464 768 F (02) 9799 6011
E dragomir.garbov@comber.net.au

From: Dragomir Garbov
Sent: Monday, 9 December 2019 3:45 PM
To: adminofficer@oralra.nsw.gov.au
Cc: Jillian Comber <jillian.comber@comber.net.au>
Subject: Griffith Base Hospital Aboriginal Cultural Heritage Assessment Notification

Good afternoon,

Griffith Hospital Redevelopment
Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010

NSW Health proposes the redevelopment of the Griffith Hospital (please see map attached). The proposal will be determined as a State Significant Development (SSD) and it may be necessary to undertake archaeological excavation.

Comber Consultants have been engaged to undertake Aboriginal community consultation in accordance with Department of Planning, Industry and Environment's (DPIE's) *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. Therefore, I am writing to you to ascertain if you are aware of Aboriginal people or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and or/places within the study area. If so, I would be pleased if you could forward their contact details to me.

I would be pleased if you could forward your response by 13 January 2020 to:

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Comber Consultants
76 Edwin Street North
Croydon, NSW, 2132
dragomir.garbov@comber.net.au
Ph: (02) 9799 6000
Mob: 0448 464 768
Fax: (02) 9799 6011

Thank you for your assistance.

DR DRAGOMIR GARBOV
ARCHAEOLOGIST
HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132
M 0448 464 768 F (02) 9799 6011
E dragomir.garbov@comber.net.au

From: Dragomir Garbov
Sent: Monday, 9 December 2019 11:39 AM
To: admin@griffith.nsw.gov.au
Cc: Jillian Comber <jillian.comber@comber.net.au>
Subject: Attn: General Manager / Re: Griffith Base Hospital Aboriginal Cultural Heritage Assessment Notification GSC

Dear Madam/Sir,

Griffith Hospital Redevelopment
Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010

NSW Health proposes the redevelopment of the Griffith Hospital (please see map attached). The proposal will be determined as a State Significant Development (SSD) and it may be necessary to undertake archaeological excavation.

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I would be pleased if you could forward your response by 13 January 2020 to:

Dr Dragomir Garbov
Comber Consultants
76 Edwin Street North
Croydon, NSW, 2132
dragomir.garbov@comber.net.au
Ph: (02) 9799 6000
Mob: 0448 464 768
Fax: (02) 9799 6011

Thank you for your assistance.

DR DRAGOMIR GARBOV
ARCHAEOLOGIST
HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132
M 0448 464 768 F (02) 9799 6011
E dragomir.garbov@comber.net.au

From: Dragomir Garbov
Sent: Monday, 9 December 2019 11:42 AM
To: admin.riverina@lls.nsw.gov.au
Cc: Jillian Comber <jillian.comber@comber.net.au>
Subject: Griffith Base Hospital Aboriginal Cultural Heritage Assessment Notification RLLS

Good afternoon,

Griffith Hospital Redevelopment
Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010

NSW Health proposes the redevelopment of the Griffith Hospital (please see map attached). The proposal will be determined as a State Significant Development (SSD) and it may be necessary to undertake archaeological excavation.

Comber Consultants have been engaged to undertake Aboriginal community consultation in accordance with Department of Planning, Industry and Environment's (DPIE's) *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. Therefore, I am writing to you to ascertain if you are aware of Aboriginal people or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and or/places within the study area. If so, I would be pleased if you could forward their contact details to me.

I would be pleased if you could forward your response by 13 January 2020 to:

Dr Dragomir Garbov
Comber Consultants
76 Edwin Street North
Croydon, NSW, 2132
dragomir.garbov@comber.net.au
Ph: (02) 9799 6000
Mob: 0448 464 768
Fax: (02) 9799 6011

Thank you for your assistance.

DR DRAGOMIR GARBOV
ARCHAEOLOGIST
HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132
M 0448 464 768 F (02) 9799 6011
E dragomir.garbov@comber.net.au

From: Dragomir Garbov
Sent: Monday, 9 December 2019 3:47 PM
To: information@ntscorp.com.au
Cc: Jillian Comber <jillian.comber@comber.net.au>
Subject: Griffith Base Hospital Aboriginal Cultural Heritage Assessment Notification NTS

Good afternoon,

Griffith Hospital Redevelopment
Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010

NSW Health proposes the redevelopment of the Griffith Hospital (please find map attached). The proposal will be determined as a State Significant Development (SSD) and it may be necessary to undertake archaeological excavation.

Comber Consultants have been engaged to undertake Aboriginal community consultation in accordance with Department of Planning, Industry and Environment's (DPIE's) *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. Therefore, I am writing to you to ascertain if you are aware of Aboriginal people or organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and or/places within the study area. If so, I would be pleased if you could forward their contact details to me.

I would be pleased if you could forward your response by 13 January 2020 to:

Dr Dragomir Garbov
Comber Consultants
76 Edwin Street North
Croydon, NSW, 2132
dragomir.garbov@comber.net.au
Ph: (02) 9799 6000
Mob: 0448 464 768
Fax: (02) 9799 6011

Thank you for your assistance.

DR DRAGOMIR GARBOV
ARCHAEOLOGIST
HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132
M 0448 464 768 F (02) 9799 6011
E dragomir.garbov@comber.net.au

UP TO DATE SEARCH OF NATIVE TITLE CLAIMS AND NATIVE TITLE REGISTER CONDUCTED ON 9/12/2019 AND AGAIN ON 8/04/2020 and 19/08/2020 – NO CURRENT CLAIMS OVER THE STUDY AREA AND NO ILUAS

Search National Native Title Register

The National Native Title Register (NNTR) is a register established under s. 192 of the *Native Title Act 1993* (Cth).

The NNTR contains determinations of native title made by:

- the High Court of Australia
- the Federal Court of Australia
- or a recognised body such as South Australia's Supreme Court and Environment Resources and Development Court.

Further [information about the NNTR](#) is available.

Tribunal file no.

Federal Court file no.

Short name

Case name

State or Territory

New South Wales

Registered Native Title Body Corporate*

Representative A/TSI body area

Local government area

Griffith City Council

Determination type

ALL

Legal process

ALL

Determination outcome

ALL

Determination date between

and

Sort by

Determination date

Search

*Please note: current contact details for the Registered Native Title Body Corporate are available from the Office of the Registrar of Indigenous Corporations www.oric.gov.au

Your search returned **1** matches.

Short name	Case name	Legal process	Determination date	Outcome
Griffith Local Aboriginal Land Council	Griffith Local Aboriginal Land Council v Attorney-General of New South Wales	Unopposed	04/12/2017	Native title does not exist

Search National Native Title Register

The National Native Title Register (NNTR) is a register established under s. 192 of the *Native Title Act 1993* (Cth).

The NNTR contains determinations of native title made by:

- the High Court of Australia
- the Federal Court of Australia
- or a recognised body such as South Australia's Supreme Court and Environment Resources and Development Court.

Further [information about the NNTR](#) is available.

Tribunal file no.	<input type="text"/>	Federal Court file no.	<input type="text"/>
Short name	<input type="text"/>	Case name	<input type="text"/>
State or Territory	<input type="text"/>	<input type="text" value="New South Wales"/>	▼
Registered Native Title Body Corporate*	<input type="text"/>	Representative A/TSI body area	<input type="text"/>
Local government area	<input type="text"/>	<input type="text" value="Griffith City Council"/>	
Legal process	<input type="text" value="ALL"/>	Determination type	<input type="text" value="ALL"/>
Determination outcome	<input type="text" value="ALL"/>		
Determination date between	<input type="text"/> and <input type="text"/>		
Sort by	<input type="text" value="Determination date"/>	<input type="button" value="Search >"/>	

*Please note current contact details for the Registered Native Title Body Corporate are available from the Office of the Registrar of Indigenous Corporations www.oric.gov.au

Your search returned **1** matches.

Short name	Case name	Legal process	Determination date	Outcome
Griffith Local Aboriginal Land Council	Griffith Local Aboriginal Land Council v Attorney-General of New South Wales	Unopposed	04/12/2017	Native title does not exist

Responses (Step 4.1.2)

GRIFFITH CITY COUNCIL DATED 9 AND 11/12/2019

From: Peta Dummett <Peta.Dummett@griffith.nsw.gov.au>
Sent: Monday, 9 December 2019 4:26 PM
To: Dragomir Garbov <Dragomir.Garbov@comber.net.au>
Cc: PA GM Mailbox <PA@griffith.nsw.gov.au>
Subject: Fw: Attn: General Manager / Re: Griffith Base Hospital Aboriginal Cultural Heritage Assessment Notification GSC

Dear Dr Garbov

Thank you for your enquiry. I have provided a few key contacts below. The members of the CWP prefer to have presentations held with everyone present but due to the time frame it might be easier to start the consultation with the people below and ask them to organise attendance at the CWP.

The Griffith Local Aboriginal Lands Council hold significant history of this area and their details are as follows-

CEO - Steven Collins
PO Box 8043 East Griffith, NSW, 2680
5 Wiradjuri Place, Griffith, NSW, 2680
Phone: (02) 69626711
Email: griffilalc@bigpond.com

Another person that would have community history and knowledge is and works with the Elders is Beverly Johnson. Bev's family is local and she had many siblings. Bev's details are:

Beverley Johnson / Coordinator
Dyirri-Bang-Gu Aboriginal Aged Care Service Corporation
Shop 6/26 Ulong St (entrance via Yambil St), Griffith
PO Box 8087, East Griffith NSW 2680
T: 02 69640518 / M: 0429640518 / F: 02 69623700 / E: dyirri1@bigpond.com

There is also an Aboriginal Community Working Party that meet monthly. The CWP has Aboriginal families and agency representatives who participate in community concerns, initiatives etc. The best contact for this is -

Richard Bamblett who works at the Griffith Aboriginal Medical Centre. (their other contact will be on school holiday break)
E: rbamblett@griffithams.org.au
Mobile: 0400681573
Ph 02 69620000

I hope the contacts are suitable. Please reply if you require further information.

Regards

Peta Dummett
Community Development Coordinator
Griffith City Council
PO Box 485
Griffith NSW 2680
www.griffith.nsw.gov.au
www.facebook.com/griffithcitycouncil

02 69628211 / 0438658683

Peta Dummett

Community Development Coordinator
p 02 6962 8211 | m 0438 658 683



Griffith City Council
a 1 Benerambah Street Griffith NSW 2680
p PO Box 485 Griffith NSW 2680
w griffith.nsw.gov.au



From: Joanne Tarbit <Joanne.Tarbit@griffith.nsw.gov.au>
Sent: Wednesday, 11 December 2019 9:47 AM
To: Dragomir Garbov <Dragomir.Garbov@comber.net.au>; Jillian Comber <jillian.comber@comber.net.au>
Cc: Carel Potgieter <Carel.Potgieter@griffith.nsw.gov.au>; Kerry Rourke <Kerry.Rourke@griffith.nsw.gov.au>; Daphne Bruce <Daphne.Bruce@griffith.nsw.gov.au>
Subject: Re: Fw: Attn: General Manager / Re: Griffith Base Hospital Aboriginal Cultural Heritage Assessment Notification GSC

Hi All,

Please find attached some potential contacts for our area. Please note some of these contacts may no longer be current.

"Robert Carrol - GLALC" griffalac@bigpond.com

"James Ingram" james.ingram@lrs.nsw.gov.au

Ethan Williams
Heritage Conservation Officer
South West Listings - Heritage Division
Office of Environment and Heritage
PO Box 397, GRIFFITH NSW 2680
Ph: 02 6969 0717 Fax: 02 6969 0710
W: www.environment.nsw.gov.au

Damien Kennedy

Heritage Conservation Officer
PO Box 397
Griffith EPA Office
Banna avenue Griffith NSW 2680
Damien.kennedy@environment.nsw.gov.au
Personal mob: 0413 419 395
Work office: 02 6969 0718



Steve Meredith
Regional Manager Southern
Ph: (02) 6969 0715
M: 0455 079 190

I acknowledge and respect the traditional custodians and lands I work across

Joanne Tarbit
Development Assessment Planner
p 02 6962 8140



Griffith City Council
a 1 Benerambah Street Griffith NSW 2680
p PO Box 485 Griffith NSW 2680
w griffith.nsw.gov.au



DPIE – Dated 20/12/2019

From: Andrew Fisher <Andrew.Fisher@environment.nsw.gov.au>
Sent: Friday, 20 December 2019 4:14 PM
To: Dragomir Garbov <Dragomir.Garbov@comber.net.au>
Cc: Daniel Clegg <Daniel.Clegg@environment.nsw.gov.au>
Subject: DPIE BCD Response RE: Griffith Base Hospital Aboriginal Cultural Heritage Assessment Notification

Hi Dragomir,

Please find attached a response to the request for Registered Aboriginal Parties for consultation with regard to the redevelopment of the Griffith Hospital.

Regards,
Andrew

Andrew Fisher
Senior Team Leader, Planning – South West

Biodiversity and Conservation | Department of Planning, Industry and Environment
T 02 6022 0623 | M 0427 562 844 | E andrew.fisher@environment.nsw.gov.au
PO Box 1040, 512 Dean St, Albury, NSW 2640
www.dpie.nsw.gov.au

Contact the South West Planning Team about biodiversity and Aboriginal cultural heritage planning and regulation matters by emailing rog.southwest@environment.nsw.gov.au.



The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.



Our ref: DOC19/1098435

Dr Dragomir Garbov

Comber Consultants
76 Edwin Street North
CROYDON NSW 2132

Via email: dragomir.garbov@comber.net.au

20 December 2019

Dear Dragomir

**Subject: Registration of Aboriginal Interests – Griffith Base Hospital Redevelopment
ACHA (SSD) – Griffith LGA**

**WRITTEN NOTIFICATION OF PROPOSAL AS REQUIRED UNDER DECCW ABORIGINAL
CULTURAL HERITAGE CONSULTATION REQUIREMENTS FOR PROPONENTS 2010**

Thank you for your correspondence dated 9 December 2019 about the above matter seeking comments from the Biodiversity and Conservation Division of the Department of Planning, Industry and Environment (The Department).

The Biodiversity and Conservation Division was formerly part of the Office of Environment and Heritage (OEH). It forms part of the new Environment, Energy and Science Group in the Department (see <https://intranet.dpie.nsw.gov.au/>). The Environment, Energy and Science Group works to protect and strengthen NSW's natural environment by managing the conservation of our environment and energy resources. We support the community, as well as business and government, in developing their ability to achieve these outcomes.

The Biodiversity and Conservation Division has statutory responsibilities relating to biodiversity (including threatened species, populations, ecological communities, or their habitats), Aboriginal cultural heritage and flooding. For matters relating to national parks estate matters please refer these to the National Parks and Wildlife Service.

Attached is a list of known Aboriginal parties for the Griffith local government area that the Department considers likely to have an interest in the development. Please note this list is not necessarily an exhaustive list of all interested Aboriginal parties. Receipt of this list does not remove the requirement of a proponent/ consultant to advertise in local print media and contact other bodies seeking interested Aboriginal parties, in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (April 2010).

Under Section 4.1.6. of the Consultation Requirements, you must also provide a copy of the names of each Aboriginal person who registered an interest to the relevant Department regional office and Local Aboriginal Land Council (LALC) within 28 days from the closing date for registering an interest.

Please note that the contact details in the list provided by the Department may be out of date as it relies on Aboriginal parties advising the Department when their details need changing. If individuals/companies undertaking consultation are aware that any groups contact details are out of date, or letters are returned unopened, please contact either the relevant stakeholder group (if you know their more current details) and/or the Department. AHIP applicants should make a note of any group they are unable to contact as part of their consultation record.

If you have any questions about this advice, please contact me via rog.southwest@environment.nsw.gov.au or 02 6022 0623.



Planning,
Industry &
Environment

Yours sincerely

Andrew Fisher

Senior Team Leader Planning

South West Branch

Biodiversity and Conservation Division

Department of Planning, Industry and Environment

ATTACHMENT A Registered Aboriginal Interests – Griffith Local Government Area



Planning,
Industry &
Environment

ATTACHMENT A Registered Aboriginal Interests

Griffith Local Government Area

Organisation/ Individual Name	Address	Contact Details
Griffith Local Aboriginal Land Council	PO Box 8043 EAST GRIFFITH NSW 2680 5 Wiradjuri Place GRIFFITH NSW 2680	Phone: 02 6962 6711 Fax: 02 6964 1477 Email: griffilalc@bigpond.com.au

RIVERINA LOCAL LAND SERVICES

Received 17/12/2019



Riverina Local Land Services

200 Murray Road
GRIFFITH NSW 2680

Tel: 02 6960 1311

www.lls.nsw.gov.au/riverina

CM9 ref: DOC19/173285

17 December 2019

Dr Dragomir Garbov
Comber Consultants
76 Edwin Street North
Croydon, NSW, 2132
E: dragomir.garbov@comber.net.au

Dear Dr Garbov

Re: Request Information on Aboriginal Stakeholders for cultural heritage assessment

Thank you for your email of 9th December 2019 seeking contact details for Aboriginal stakeholder consultation and assessment in the Griffith Hospital Redevelopment. I recommend that you consult the Local Aboriginal Lands Council in Griffith. Contact details are as follows:

Stephen Collins
CEO
5 Wiradjuri Place, Griffith NSW 2680
PH 0269641477
E-griffllalc@bigpond.com

If you have any questions or would like to discuss this further with Local Land Services staff, please contact Greg Packer (Snr Land Services Officer, Aboriginal Communities) on 02 6923 6347 or 0427 262 470.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Ray Willis', is written over a light blue rectangular background.

Ray Willis
Acting General Manager



**Local Land
Services**

www.lls.nsw.gov.au
We help secure the future of agriculture and the environment for NSW communities.



18 December 2019

By email: Dragomir.Garbov@Comber.net.au

Dr Dragomir Garbov
Comber Consultants
76 Edwin Street North
CROYDON NSW 2132

Dear Dr Garbov,

Request - Search for Registered Aboriginal Owners

We refer to your email dated 9 December 2019 regarding an Aboriginal Cultural Heritage Assessment for the proposed redevelopment of the Griffith Base Hospital in Griffith, NSW.

Under Section 170 of the *Aboriginal Land Rights Act 1983* the Office of the Registrar is required to maintain the Register of Aboriginal Owners (RAO). A search of the RAO has shown that there are not currently any Registered Aboriginal Owners in the project area.

We suggest you contact Griffith Local Aboriginal Land Council on (02) 69626711 as they may be able to assist you in identifying Aboriginal stakeholders who wish to participate.

Yours sincerely

Elizabeth Loane
Project Officer, Aboriginal Owners
Office of the Registrar, ALRA

Newspaper Notification (Step 4.1.3)

The newspaper notification in *The Area News*, Griffith NSW, on **03/01/2020** requested responses to be received by COB **17/01/2020**.

griffithnews.com.au

Friday January 03, 2020 THE AREA NEWS 7

NEWS

Decades of service praised

OUR PEOPLE

BY SHAWN PATTERSON

BACK in 1986, Riverina local Deanna Marriott held the first ever Biggest Morning Tea in Griffith to raise funds for the Cancer Council.

Since then, her contributions over the past 30 years have raised over \$1.6M for cancer research.

Her incredible achievement has been acknowledged by the Cancer Council, who presented her with the prestigious 'Individual Fundraiser of the Year' award.

"It's amazing, but there is one thing about it," Ms Marriott explained.

"I don't do this on my own, I have a wonderful band of helpers and without those people that come each year, none of this would be possible." The dedication from Deanna and her team has helped Griffith enter to a number of charitable events over the past two decades, including Daffodil Day and Relay for Life.

Despite never suffering from cancer herself, Deanna began her journey to help others through her lost



ROUND SOUL: Deanna Marriott was given the Individual Fundraiser of the Year award by Cancer Council New South Wales. PHOTO: Contributed

friend Ian Newman, who was first diagnosed with cancer at the age of 56.

Through the unfortunate times, Ian created a support group to help others, dismissing her own suffering to improve the world around her.

Ian Newman unfortunately lost her battle with leukemia in 2016. "Ian was just really good with people," Ms Marriott explained.

"When it came to the Biggest Morning Tea, we were a really good team."

The legacy of both is

now in their treatment plans. It also allows patients to help others by improving cancer treatment for future patients.

Through raising funds to improve cancer research, doctors are able to offer high-quality patient care,

side in their treatment plans.

"Cancer isn't really a death sentence anymore," Ms Marriott said.

and still go on to live a very fulfilling life.

"A lot of the reason for that is cancer research, which is why we're doing what we do."

If you would like to donate to the Cancer Council, you

opportunity to take an active

"You can be diagnosed or call 03 11 30.



COMMITTED: Members of the Murrumbidgee Suicide Prevention and Postvention group with Deputy Prime Minister Michael McCormack. PHOTO: Supplied

Pledge for further support

A PLEDGE to provide a coordinated approach to suicide prevention in the region has been made.

Organisations and services from across the region signed onto a formal statement of commitment, which aims to structure an approach to suicide prevention and postvention support across the region.

Deputy Prime Minister and Member for Riverina Michael McCormack also signed the statement and he said a coordinated approach was critical to reduce suicide rates in the region.

"Suicide, and indeed, a critical incident where a life has been lost or significantly altered, impacts not only a family, but in our small rural towns, the whole community," Mr McCormack said.

"It is my hope that these efforts will eventually lead to reduction in suicide rates across the region."

Murrumbidgee Primary Health Network chief executive officer Melissa Neal said the commitment will focus on improving three key areas identified by round table discussions held between a number of groups over the

course of the last year.

"These needs were to build community capacity to identify people in need of support and how best to support them; to build awareness around what local support are available to encourage help-seeking behaviours; and finally to develop a coordinated response to communities impacted by suicide or other critical incidents," Ms Neal said.

If you, or anyone you know is suffering from depression or suicidal thoughts you can call Lifeline on 13 11 14.

— CAIRN BERNING

Aboriginal Cultural Heritage Griffith Hospital Notification and Registration of Aboriginal Interests

NSW Health is currently undertaking planning for the proposed redevelopment of the Griffith Hospital, located within the Griffith Local Government Area (GLGA). Please see map. It may be necessary to undertake Aboriginal archaeological excavation prior to the redevelopment.

The proposed development will be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*. This requires Aboriginal community consultation to be undertaken in accordance with the Department of Planning, Industry and Environment's (DPIE) *Aboriginal cultural heritage consultation requirements for proponents 2018*.

Registrations of interest are sought from Aboriginal people who hold cultural knowledge relevant to determining the significance of any potential Aboriginal objects at this location. This will assist in the assessment of the proposal by DPIE.

Please note that the details of Aboriginal people or organisations who register an interest will be forwarded to DPIE and the Griffith Local Aboriginal Land Council (GLALC). If you do not want your details forwarded to the GLALC, please specify in your letter when registering an interest that you do not want your details forwarded to the GLALC.

Comber Consultants Pty Ltd has been appointed to undertake Aboriginal consultation and the archaeological assessment.

You can register, indicating the nature of your interest, by phone or in writing to:

Dr Dragomir Garbow
Comber Consultants Pty Ltd
76 Edwin Street North, Croydon NSW 2132
Tel: (02) 9799 6000 | Mobile: 0448 464768 | Fax: (02) 9799 6011
dragomir.garbow@comber.net.au

REGISTRATIONS MUST BE RECEIVED BY COB 17 JANUARY 2020



Aboriginal Cultural Heritage Griffith Hospital Notification and Registration of Aboriginal Interests

NSW Health is currently undertaking planning for the proposed redevelopment of the Griffith Hospital, located within the Griffith Local Government Area (LGA). Please see map. It may be necessary to undertake Aboriginal archaeological excavation prior to the redevelopment.

The proposed development will be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*. This requires Aboriginal community consultation to be undertaken in accordance with the Department of Planning, Industry and Environment's (DPIE) *Aboriginal cultural heritage consultation requirements for proponents 2010*.

Registrations of interest are sought from Aboriginal people who hold cultural knowledge relevant to determining the significance of any potential Aboriginal objects at this location. This will assist in the assessment of the proposal by DPIE.

Please note that the details of Aboriginal people or organisations who register an interest will be forwarded to DPIE and the Griffith Local Aboriginal Land Council (GLALC). If you do not want your details forwarded to the GLALC, please specify in your letter when registering an interest that you do not want your details forwarded to the GLALC.

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You can register, indicating the nature of your interest, by phone or in writing to:

Dr Dragomir Garbov
Comber Consultants Pty Ltd
76 Edwin Street North, Croydon NSW 2132
Tel: (02) 9799 6000 | Mobile: 0448 464768 | Fax: (02) 9799 6011
dragomir.garbov@comber.net.au

REGISTRATIONS MUST BE RECEIVED BY COB 17 JANUARY 2020



Copy of written notification to Aboriginal people and/or organisations from step 4.1.2 (Step 4.1.3)

From: Dragomir Garbov

Sent: Thursday, 19 December 2019 4:58 PM

To: griffalac@bigpond.com; dyirri1@bigpond.com; rbamblett@griffithams.org.au; james.ingram@lls.nsw.gov.au; damien.kennedy@environment.nsw.gov.au

Subject: Griffith Base Hospital ACHAR Invitation to Register Interest for Consultation

Dear Madam/Sir

Griffith Base Hospital Redevelopment Aboriginal Cultural Heritage Assessment

Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010

NSW Health is currently undertaking planning for the proposed redevelopment of the Griffith Hospital, located within the Griffith Local Government Area (LGA). Please see the attached map. It may be necessary to undertake Aboriginal archaeological excavation prior to the redevelopment.

The proposed development will be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*. This requires Aboriginal community consultation to be undertaken in accordance with the Department of Planning, Industry and Environment's (DPIE) *Aboriginal cultural heritage consultation requirements for proponents 2010*.

Comber Consultants have been engaged to undertake Aboriginal community consultation in accordance with DPIE's *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. Therefore, I am writing to you to invite you to register an interest in consultation.

Please note that this invitation is for Aboriginal community consultation, which should not be confused with employment. As stated in section 3.4 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*: "Consultation does not include the employment of Aboriginal people to assist in field assessment and/or site monitoring". Therefore, responding to this invitation is not an automatic right to employment.

Could you please provide a response by 16 January 2020 to:

Dr Dragomir Garbov
Comber Consultants Pty Ltd
76 Edwin Street North
Croydon NSW 2132
Mobile: 0448 464768
Fax: (02) 9799 6011
dragomir.garbov@comber.net.au

DR DRAGOMIR GARBOV
ARCHAEOLOGIST
HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132
M 0448 464 768 F (02) 9799 6011
E dragomir.garbov@comber.net.au

From: Dragomir Garbov
Sent: Thursday, 19 December 2019 5:23 PM
To: ethan.williams@environment.nsw.gov.au; steve.meredith@environment.nsw.gov.au
Cc: Jillian Comber <jillian.comber@comber.net.au>
Subject: Griffith Base Hospital ACHAR Invitation to Register Interest for Consultation

Dear Steve and Ethan,

Griffith Base Hospital Redevelopment Aboriginal Cultural Heritage Assessment

Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010

NSW Health is currently undertaking planning for the proposed redevelopment of the Griffith Hospital, located within the Griffith Local Government Area (LGA). Please see the attached map. It may be necessary to undertake Aboriginal archaeological excavation prior to the redevelopment.

The proposed development will be assessed as a State Significant Development (SSD) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*. This requires Aboriginal community consultation to be undertaken in accordance with the Department of Planning, Industry and Environment's (DPIE) *Aboriginal cultural heritage consultation requirements for proponents 2010*.

Comber Consultants have been engaged to undertake Aboriginal community consultation in accordance with DPIE's *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. Therefore, I am writing to you to invite you to register an interest in consultation.

Please note that this invitation is for Aboriginal community consultation, which should not be confused with employment. As stated in section 3.4 of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*: "Consultation does not include the employment of Aboriginal people to assist in field assessment and/or site monitoring". Therefore, responding to this invitation is not an automatic right to employment.

Could you please provide a response by 16 January 2020 to:

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E dragomir.garbov@comber.net.au

List of Registered Aboriginal Parties (Step 4.1.3)

Registration of interest was received from the Griffith Local Aboriginal Land Council at a meeting on 4th December 2019 and by email dated 9th March 2020.

Send Notification of names of each Aboriginal person who registered an interest to DPIE and the GLALC

Notification was sent by email to Mr Andrew Fisher, DPIE and to Stephen Young, GLALC on 19/02/2020. Please note that at the date of sending this email written notification had not been received from the GLALC, although they did indicate verbally at a meeting on 4th December 2019 that they would like to register an interest. Since sending the email below the GLALC have responded in writing by email dated 9th March 2020

Dragomir Garbov

From: Dragomir Garbov
Sent: Wednesday, 19 February 2020 11:46 AM
To: Andrew Fisher
Cc: Jillian Comber
Subject: Griffith Base Hospital ACHAR DPIE Notification
Attachments: Griffith Base Hospital Eol Invitation.pdf; Comber Consultants - Page - 3rd Jan 2020.pdf; Griffith Base Hospital ACHAR List of RAPs.pdf

Good afternoon Andrew,

Comber Consultants is undertaking Aboriginal consultation in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. As required by 4.1.6 of the ACHCRPs, please find attached:

- A list of Registered Aboriginal Parties on the project (we have no registrations of interest; Griffith LALC did not register interest however is being consulted as per ACHCRPs).
- A copy of the invitation for Eol as required by 4.1.3
- A copy of the advertisement as required by 4.1.3

Kind regards,

Dragomir

DR DRAGOMIR GARBOV
ARCHAEOLOGIST
HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132
M 0448 464 768 F (02) 9799 6011
E dragomir.garbov@comber.net.au



Dragomir Garbov

From: Dragomir Garbov
Sent: Wednesday, 19 February 2020 11:48 AM
To: griffalac@bigpond.com
Cc: Jillian Comber
Subject: Griffith Base Hospital ACHAR Griffith LALC Notification
Attachments: Griffith Base Hospital Eol Invitation.pdf; Comber Consultants - Page - 3rd Jan 2020.pdf; Griffith Base Hospital ACHAR List of RAPs.pdf

Good afternoon,

Comber Consultants is undertaking Aboriginal consultation in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*. As required by 4.1.6 of the ACHCRPs, please find attached:

- A list of Registered Aboriginal Parties on the project (we have no registrations of interest; Griffith LALC did not register interest however is being consulted as per ACHCRPs).
- A copy of the invitation for Eol as required by 4.1.3
- A copy of the advertisement as required by 4.1.3

Kind regards,

Dragomir

DR DRAGOMIR GARBOV
ARCHAEOLOGIST
HERITAGE CONSULTANT



76 EDWIN STREET NORTH, CROYDON, NSW, 2132
M 0448 464 768 F (02) 9799 6011
E dragomir.garbov@comber.net.au



4.2 Presentation of Information

Details of the proposal including a copy of the plans were shown to Steve Collins, Acting CEO, GLALC on 4th December 2019 and the project discussed in detail. The Minutes of the meeting are detailed below:

MINUTES OF MEETING HELD ON WEDNESDAY 4th DECEMBER 2019 HELD AT GRIFFITH BASE HOSPITAL REDEVELOPMENT OF GRIFFITH BASE HOSPITAL

PRESENT:

Steve Collins, Acting CEO, Griffith Local Aboriginal Land Council
Jillian Comber, Archaeologist, Comber Consultants
Chris Jones, Archaeological Assistant Comber Consultants
Kadi Khan, Archaeological Assistant, Comber Consultants
Rivers McEwen, Archaeological Assistant Comber Consultants
Patrick O’Carrigan, Architect, Patrick O’Carrigan & Partners

PROJECT:

Jillian Comber gave Steve Collins a copy of the plans for the redevelopment and described the proposal and the impact. Both Jillian Comber and Patrick O’Carrigan answered Steve’s questions. Steve advised that the GLALC did not object to the redevelopment, as they acknowledged that it was necessary to provide good health care, but were concerned about cultural heritage issues.

CULTURAL HERITAGE

Steve advised that the community had recently had a meeting to discuss the hospital redevelopment. The site of the hospital is important. Burials, scarred trees and artefact scatters had been located nearby and they considered that it was possible that surface and subsurface evidence of occupation could exist on the site. He advised that the GLALC wanted a detailed survey to be undertaken and archaeological excavation to recover any artefacts. He wanted the artefacts to be held by the GLALC. A methodology for the testing was discussed and agreed upon.

PLANNING

Jillian advised Steve that early works would be undertaken and that Health Infrastructure would determine the early works under a Review of Environmental Factors. Testing would be undertaken in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*. If salvage was required it would be necessary to apply for an AHIP.

Construction of the hospital would be a State Significant Development, therefore, it would not be necessary to apply for an Aboriginal Heritage Impact Permit. The salvage could be undertaken in accordance with the Secretary’s Environmental Assessment Requirements (SEARS).

SITE VISIT

The meeting was held at the site of the Griffith Base Hospital. It was held outside at a table in the hospital grounds. Comber Consultants’ staff undertook a detailed survey of the Hospital grounds. Steve did not participate fully in the walkover but gave advice about the site types that would be expected.

4.3 Presentation of Methodology and gathering cultural information

- The GLALC provided cultural information at the meeting of 4th December 2019.
- The methodology, which had been previously agreed upon, was sent by email on 3rd February 2020.

From: Dragomir Garbov
Sent: Monday, 3 February 2020 5:25 PM
To: 'griffalac@bigpond.com' <griffalac@bigpond.com>
Cc: Jillian Comber <jillian.comber@comber.net.au>
Subject: Griffith Base Hospital ACHAR methodology

Good afternoon,

As per Consultation under the *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DPIE 2010), please find attached a draft methodology for archaeological testing and salvage at the Griffith Base Hospital. Please forward your comments to us by COB on Monday 2 March 2020.

Kind regards,

DR DRAGOMIR GARBOV
ARCHAEOLOGIST
HERITAGE CONSULTANT

76 EDWIN STREET NORTH, CROYDON, NSW, 2132
M 0448 464 768 F (02) 9799 6011
E dragomir.garbov@comber.net.au

TESTING AND SALVAGE METHODOLOGY UNDER REF SENT WITH ABOVE EMAIL

As the early works are to be approved under a REF the testing should be undertaken in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*. The salvage will then need to be undertaken at a later date with an AHIP.

Aims

The aim of the archaeological testing and salvage will be to:

- Recover sufficient information to allow comparison of data across the Riverina Region.
- Undertake dating for comparison with other sites
- Determine if evidence of contact archaeology exists at the site.

Testing and Salvage

The testing will be undertaken in two stages as follows:

Stage 1: testing

The purpose of Stage 1 is to establish whether:

- Archaeological evidence is present
- If archaeological evidence is present to determine its integrity and significance
- To determine if sufficient triggers are present to necessitate the Stage 2 excavations.

Prior to the testing any concrete slabs and fill will be removed by an excavator. Once that has been undertaken, to maintain scientific control a grid will be laid over the site. The grid will divide the site into 1m x 1m squares located approximately 10m

apart. The location of the trenches will be dependent upon site conditions such as the location of underground services and the location of significant historical archaeological features. However, if the trenches cannot be located exactly 10m apart because of unforeseen factors, attempts will be made to place the trenches as close to each other as possible. Each square will be numbered. Trenches will initially be excavated to establish:

- Evidence of artefacts
- Evidence of hearths
- Evidence of midden material or other cultural deposits

Test pits will be dug by hand in 5cm spits or appropriate stratigraphy/feature and the following will be undertaken:

- The soil will be tested for its Ph level.
- An assessment of the geomorphological context of the site and each spit will be undertaken by a suitably qualified geomorphologist. That assessment will guide the analyses of each spit.
- The location of any artefacts or other cultural deposits found during excavation will be recorded and the artefacts bagged and catalogued.
- The soil removed during the excavation will be wet sieved and any artefacts found in the sieved layer bagged and catalogued, clearly noting that they were found within the sieved soil, not *in situ*.

If any of the following information (or triggers) are uncovered the relevant trench will be extended as detailed for Stage 2 below:

- Higher relative artefact densities.
- Rare or unusual artefact types, such as backed blades or axe heads.
- Unusual raw material types.
- Archaeological features such as hearths, organic material, midden material or other cultural features eg knapping floors, debitage, contact artefacts, manuports or any evidence that indicates human activity.
- Material with potential for scientific dating.
- Evidence of contact archaeology (for example, flaked glass or flaked insulators).
- Evidence that relates to environmental or geomorphological site formation processes.
- Geomorphological evidence that may answer the questions guiding the program of archaeological testing.
- Any other cultural feature identified by the Excavation Director or Aboriginal community representatives as worthy of further investigation.

Stage 2: salvage

The purpose of the Stage 2 is to recover evidence that will compliment and extend the information obtained from other sites excavated within the Riverina Region.

The Stage 2 salvage and recovery will be undertaken in the following manner:

- Test trenches will be by hand.
- Test trenches will be in 1m x 1m pits.
- Test trenches will be in stratigraphic layers and/or in 5cm spits. 5cm spits will be utilised to provide greater scientific control over the results of the excavations and to allow comparison with other sites. Where necessary stratigraphic layers (when specific environmental features which address the research questions are encountered) will be followed rather than spits.
- Soil samples will be taken. This will assist in analyses now and in the future, in the interpretation of the landscape and will include samples for palynological analyses.
- If dateable charcoal is uncovered, samples for all cultural features which contain reliable charcoal will be recovered for dating.
- At least one sample will be taken for optimal stimulating thermoluminescence (TL) and/or optically stimulated luminescence (OSL) dating. Consideration will be given to taking a number of samples. The number of samples taken will depend on the stratigraphic differences over the site and the nature and integrity of the archaeological deposits.
- If hearths are uncovered, Dr Andy Herries (La Trobe University) will be consulted. Dr Herries has pioneered the integration of archaeomagnetic and palaeomagnetic techniques to date and obtained cultural data from hearths. If possible, attempts will be made to obtain dates from the hearths.
- An assessment of the geomorphological context of the site will be undertaken by a suitably qualified geomorphologist. This will assist in obtaining relevant environmental and geomorphological information to assist in the understanding of site formation processes.
- Plotting of artefact concentrations will be undertaken.
- Conjoin analysis of artefacts from a concentration of artefacts throughout the profile will be undertaken.
- Plotting of all other features such as hearths, heat treatment locations, ovens, etc., will be undertaken to precisely locate each within their exact stratigraphic context.
- Plotting and mapping of all manuports (i.e. non-artefactual, ochre, cobbles that have not been reduced, etc.) and

other cultural features will be undertaken.

- All natural features (such as tree roots) which are not identified as culturally produced features will be plotted.
- Plotting and mapping of all unusual artefacts and large artefacts to locate them in their exact spatial context within the excavated deposit will be undertaken.
- The soil will be wet sieved through double nested sieves of 3mm and 5mm mesh. Sandy deposits may not need wet sieving, and so may be dry sieved. If artefacts smaller than 3mm are identified, the sieve size will be reduced to 1mm to ensure that micro debitage is retrieved.
- Cessation of Stage 2 excavation expansion will be guided by the individual feature or trigger in question so as to investigate the extent of that occurrence or feature, or as limited by the impact and/or AHIP boundary.

DRAFT ACHAR SENT TO GLALC ON 9TH MARCH 2020

Response from GLALC to Methodology and ACHAR

From: GLALC <griffalac@bigpond.com>
Sent: Tuesday, 10 March 2020 11:47 AM
To: Dragomir Garbov <Dragomir.Garbov@comber.net.au>
Subject: RE: Griffith Base Hospital Draft ACHAR

Good Morning Dragomir,

Thank you for your email entailed with consultative engagement with the Griffith Local Aboriginal Land Council, in acknowledgment of GLALC being a Registered Aboriginal Party (RAP) as per the requirement Code of Practice for Aboriginal Archaeological Investigation of Aboriginal Objects in NSW (DECCW,2010b) and the guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH,2011) in completion of Griffith Base Hospital's ACHAR.

In review of the identified Aboriginal cultural Heritage research reports has identified that Aboriginal ancestral objects would be unearthed within proposed re-development site, therefore the GLALC would require a GLALC Aboriginal Cultural Assessments Officer to undertake a site survey of the proposed site re-development area. If Aboriginal Cultural artefacts/material are unearthed we would the request retrieval in providing them to this organisation for the ongoing protection of our local Wiradjuri Aboriginal Cultural Heritage.

If you require any further clarification/information please don't hesitate to contact the GLALC.

Regards

Stephen Young
Acting CEO GLALC.

From: Dragomir Garbov <Dragomir.Garbov@comber.net.au>
Sent: Monday, 9 March 2020 12:28 PM
To: griffalac@bigpond.com
Cc: Jillian Comber <jillian.comber@comber.net.au>
Subject: Griffith Base Hospital Draft ACHAR

Good afternoon,

As per Stage 4 of consultation in accordance with the *Aboriginal Cultural Heritage Consultation Requirements* (DPIE 2010), please find attached the draft Aboriginal Cultural Heritage Assessment Report (ACHAR) for the Griffith Base Hospital. We are recommending archaeological testing, if Aboriginal objects are uncovered during the archaeological testing, archaeological salvage must be undertaken.

We would be very pleased if you could provide us with your comments by COB on Monday 6 April 2020.

Kind regards,

DR DRAGOMIR GARBOV
ARCHAEOLOGIST

APPENDIX B: ARCHAEOLOGICAL ASSESSMENT REPORT

ARCHAEOLOGY - HERITAGE - MEDIATION - ARBITRATION

GRIFFITH BASE HOSPITAL

Aboriginal Archaeological Assessment

PREPARED BY	JILLIAN COMBER & DR DRAGOMIR GARBOV
REPORT TO	HEALTH INFRASTRUCTURE NSW
LGA	GRIFFITH
VERSION NO	D.2021
DATE	JANUARY 2021

DOCUMENT CONTROL

PROJECT NO.: CB374 **STATUS:** FINAL

REV	DATE	PREPARED	EDITED	APPROVED
A	03/03/2020	Jillian Comber and Dr Dragomir Garbov	Jillian Comber	Jillian Comber
B	15/04/2020	Jillian Comber and Dr Dragomir Garbov	Jillian Comber	Jillian Comber
C	24/01/2021	Dr Jillian Comber and Dr Dragomir Garbov	Jillian Comber	Jillian Comber
D	28/01/2021	Dr Jillian Comber and Dr Dragomir Garbov	Jillian Comber	Jillian Comber

Comber Consultants has a certified integrated management system to the requirements of ISO 9001 (quality), ISO 14001 (environmental), ISO 45001 (health and safety) and AS/NZS 4801 (health and safety). This is your assurance that Comber Consultants is committed to excellence, quality and best practice and that we are regularly subjected to rigorous, independent assessments to ensure that we comply with stringent Management System Standards.

EXECUTIVE SUMMARY

NSW Health Infrastructure are undertaking a redevelopment of the Griffith Base Hospital. The project will provide expanded inpatient, surgical, ambulatory care and critical care services to Griffith Base Hospital. It will also enable the consolidation of several ageing and dislocated buildings into an integrated and contemporary healthcare facility.

To ensure that the Aboriginal archaeological significance of the study area is not adversely impacted upon by the proposal, Comber Consultants were commissioned to undertake this Aboriginal archaeological assessment in accordance with the Department of Planning, Industry and Environment's (DPIE's) *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (2010), to inform an Environmental Impact Statement.

This report assessed the study area to contain subsurface Aboriginal archaeological potential (Aboriginal *objects*) which is protected under Part 6 of the *National Parks & Wildlife Act 1974*.

This report therefore makes the following recommendations:

1. Aboriginal consultation in accordance with DPIE's Aboriginal Cultural Heritage Consultation for Proponents 2010, which has commenced, should continue.
2. As subsurface Aboriginal objects are predicted to exist within the study area, and it is an offence to harm such objects, testing and salvage excavations should be undertaken in association with the Griffith Local Aboriginal Land Council. As this is an SSDA project, an AHIP will not be required.



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1.0 INTRODUCTION

1.1 Background

NSW Health Infrastructure are undertaking the redevelopment of the Griffith Base Hospital. Details of the proposal are contained in Section 2 of this report.

To ensure that the Aboriginal archaeological significance of the study area is not adversely impacted upon by the proposal, Comber Consultants were commissioned to undertake an Aboriginal Archaeological and Cultural Heritage Assessment in accordance with the Department of Planning, Industry and Environment's (DPIE's) *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (2010) and provide this report to inform the Environmental Impact Statement (EIS).

1.2 Location

The city of Griffith lies within the Murrumbidgee Irrigation Area, in the north western Riverina region of New South Wales, approximately 480km west of Sydney and is located within the Griffith City Council Local Government Area (LGA) (Figure 1)

The Griffith Base Hospital, referred to as 'the study area', is located at 5-39 Animoo Avenue, Griffith NSW and is known as Lot 2 DP, 1043580 (Figure 2).



Figure 1: Location of Griffith within New South Wales



Figure 2: Location of study area within Griffith NSW



1.3 Archaeological assessment objectives

Comber Consultants was commissioned to:

- a. Undertake background research, including a search of the Department of Planning, Industry and Environment's Aboriginal Heritage Information Management System (AHIMS);
- b. Undertake site inspection of the subject land, in association with the Griffith Local Aboriginal Land Council, to determine whether any Aboriginal sites or places are located within the area of the proposal and to record any sites located;
- c. Assess the impact of the proposed development on Aboriginal objects;
- d. Provide management recommendations.
- e. Prepare a report in accordance with the Office of Environment & Heritage's *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*.

1.4 Project team

This report was prepared by Jillian Comber, Archaeologist and Dr Dragomir Garbov, Archaeologist. The site inspection was undertaken by Jillian Comber, Archaeologist, Kadibulla Khan, Archaeological Assistant and Christopher Jones, Archaeological Assistant. GIS and mapping was prepared by David Nutley, Archaeologist and Dr Dragomir Garbov. Jillian Comber reviewed and approved this report.



2.0 LEGISLATION

2.1 National Parks & Wildlife Act 1974

The *National Parks & Wildlife Act 1974* (NPW Act) provides statutory protection to all Aboriginal sites within New South Wales. Heritage NSW is the State Government agency responsible for the implementation and management of this Act.

Part 6 of the *National Parks & Wildlife Act* states that it is an offence to harm or desecrate an Aboriginal object or Aboriginal place, without an Aboriginal Heritage Impact Permit (AHIP). An Aboriginal objects is defined as:

Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.

An Aboriginal Place is defined as:

A place that, in the opinion of the Minister, is or was of special significance with respect to Aboriginal culture, to be an Aboriginal place for the purposes of this Act.

As this project is being assessed as a State Significant Development approval under Part 6 of the *National Parks & Wildlife Act 1974* will not be required. Please see below.

2.2 Environmental Planning & Assessment Act 1979

This project is being undertaken as a State Significant Development under Part 4, Division 4.1 of the *Environmental Planning & Assessment Act 1979* (EPA Act). Section 89J of the EPA Act (see below) does not require that a State Significant Development seek approval under the NPW Act as follows:

Section 89J of the EPA Act states the following:

89J Approvals etc legislation that does not apply

The following authorisations are not required for State significant development that is authorised by a development consent granted after the commencement of this Division (and accordingly the provisions of any Act that prohibit an activity without such authority do not apply):

- (a) the concurrence under Part 3 of the *Coastal Protection Act 1979* of the Minister administering that Part of that Act,
 - (b) a permit under section 201, 205 or 219 of the *Fisheries Management Act 1994*
 - (c) an approval under Part 4, or an excavation permit under section 139, of the *Heritage Act 1977*
 - (d) an Aboriginal heritage impact permit under section 90 of the *National Parks and Wildlife Act 1974*
 - (e) an authorisation referred to in section 12 of the *Native Vegetation Act 2003* (or under any Act repealed by that Act) to clear native vegetation or State protected land,
 - (f) a bush fire safety authority under section 100B of the *Rural Fires Act 1997*,
 - (g) a water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the *Water Management Act 2000*.
- (2) Division 8 of Part 6 of the *Heritage Act 1977* does not apply to prevent or interfere with the carrying out of State significant development that is authorised by a development consent granted after the commencement of this Division.
- (3) A reference in this section to State significant development that is authorised by a development consent granted after the commencement of this Division includes a reference to any investigative or other activities that are required to be carried out for the purpose of complying with any environmental assessment requirements under this Part in connection with a development application for any such development.

The EPA Act is administered by the Department of Planning and Environment who will provide the consent for this project and for any impact on Aboriginal objects. Section 89J(d) does not require the consent of the Office of Environment & Heritage.



3.0 PROPOSAL

The original buildings of the Griffith Base Hospital were constructed in 1931 and have since been altered and extended many times and new buildings constructed. The first extensions/new building works commenced in 1935 and continued until 1999. The need for the redevelopment is to improve efficiencies across the hospital, improve aging infrastructure and address the changing models of healthcare to meet future growth and demand.

The proposed works are detailed below and shown on Figures 3-5.

- Demolition of Buildings 1, 2, 6, 9, 15, 16, 17, 19, 20, 22, 24, 25, 28 29, 31 and 35
- Construction of new clinical services building
- Construction of new western car park
- Construction of new main car park
- Demolition of temporary car park
- Landscaping work



Figure 3: Layout of Griffith Base Hospital (CBRE)

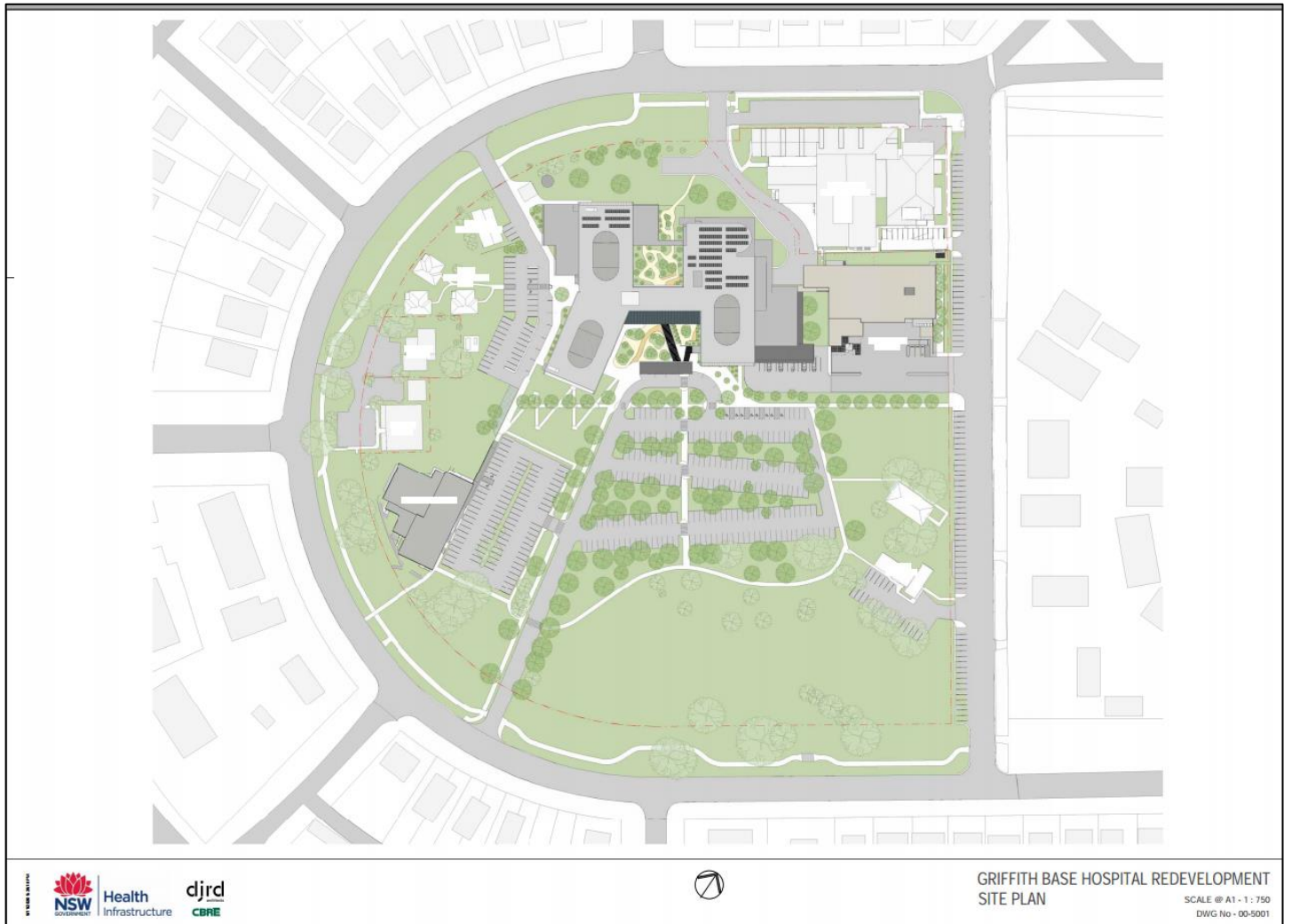


Figure 4: Griffith Base Hospital redevelopment plan (DJRD)



4.0 METHODOLOGY

This project was conducted in three stages, being background research, site inspection and report preparation, as detailed below.

Stage 1: Background Research

Prior to the field component of this project, the Department of Planning, Industry and Environment's (DPIE's) Aboriginal Heritage Information Management System (AHIMS) was consulted on 22 November 2019 (basic search and extensive search). A copy of the extensive search is attached at Appendix A. Site data, associated documents and archaeological survey reports held in the AHIMS database were reviewed. Environmental information relating to Aboriginal land use was also researched. Such research facilitated an understanding of the potential nature of the sites and site patterning in the region, which enabled a predictive statement to be made. It also provided an archaeological and environmental context within which a significance assessment could be made.

Stage 2: Site Inspection

The archaeological inspection was undertaken on 4 December 2019 by Jillian Comber, Archaeologist, Kadibulla Khan, Archaeological Assistant and Christopher Jones, Archaeological Assistant, in consultation with Steve Collins, Acting CEO of the Griffith Local Aboriginal Land Council.

Stage 3: Report Preparation

Further archaeological research was conducted where necessary to clarify the results of the survey. This report was then compiled and provided to the proponent and the Griffith Local Aboriginal Land Council.



5.0 ABORIGINAL CONSULTATION

Aboriginal culture is dynamic and continuous. It includes the tangible and intangible and links people over time to their community and land. It is important to recognise that Aboriginal people have the right to protect, preserve and promote their cultural heritage. In recognition of that right, the Griffith Local Aboriginal Land Council (GLALC) was invited to take part in the project and participated fully in this archaeological and cultural heritage assessment. The GLALC's representative, Mr Steve Collins, met with the consultant on 4th December 2019 and discussed the project. Steve viewed plans showing the redevelopment, discussed the impact on the cultural heritage of the hospital and the Aboriginal community. He advised that a community meeting had recently been held in which in redevelopment of the hospital was discussed and those attending had expressed their concern about cultural heritage protection at the site. Steve advised that there were known burials and scarred trees in the vicinity of the hospital and they believed that the hospital site had the potential to contain further evidence of Aboriginal occupation such as stone tools. They would like Aboriginal archaeological test excavations to be undertaken and discussed a proposed methodology with the consultant. Steve registered an interest on behalf of the GLALC for consultation.

In addition, consultation is being undertaken in accordance with DPIE's *Aboriginal Cultural Heritage Consultation Guidelines for Proponents* (2010). An Aboriginal Cultural Heritage Assessment Report (ACHAR) will be prepared and this archaeological assessment will be appended to the ACHAR. To date, the only Registered Aboriginal Party (RAP) is the Griffith Local Aboriginal Land Council. Consultation will be ongoing with the GLALC throughout this project.



6.0 ABORIGINAL HISTORY

Griffith is located within the western portion of Wiradjuri country. Wiradjuri country is located in central New South Wales and encompasses an area of over 80,000 square kilometres making it one of the largest Aboriginal language regions in Australia (Macdonald 2004:22). See Figure 7. The term Wiradjuri can refer to the people, their language or the geographical area designated as Wiradjuri Country (Macdonald 1986:3). Where once it may have clearly referred to a language group, today Wiradjuri people are defined by an extensive kin network (Macdonald 1986; Read 1983:xii) and by their cultural heritage.

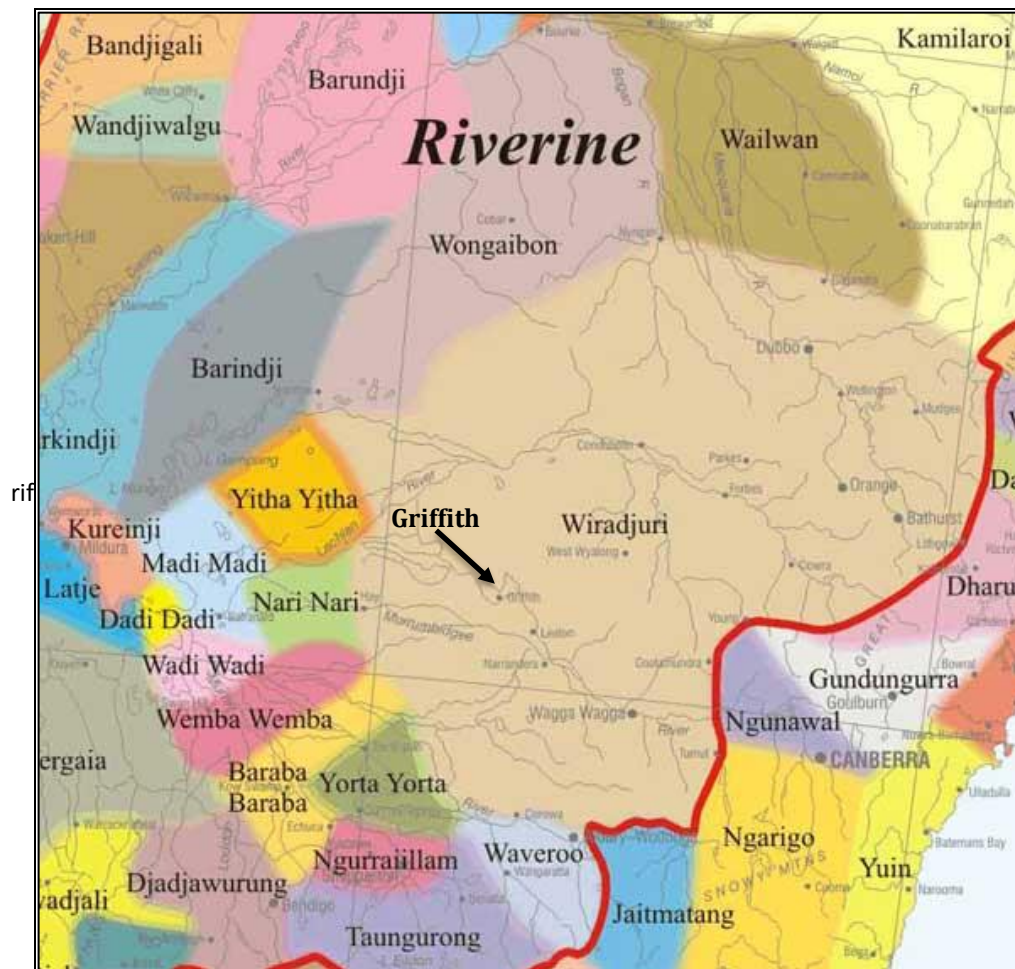


Figure 5: Showing the location of the Wiradjuri Nation within the Riverina (Horton 1996)

Wiradjuri country includes part of the Riverina region on the central west slopes and plains of New South Wales and extends from Nyngan to Albury, and Bathurst to Hay (Horton 1994(2):1189; Macdonald 2004:22) (Figure 6). Wiradjuri people refer to their land as “The Country of the Three Rivers”, with the watershed of the Macquarie, Lachlan and Murrumbidgee Rivers forming the boundaries. The Macquarie River in the north was known to the Wiradjuri as “Wambool”; the Lachlan River, which was known to the Wiradjuri as “Kalar”, is to the west and the Murrumbidgee, which retains its traditional Wiradjuri name, flows to the south. The Macquarie meets the Barwon and flows west into the Darling River and then flows south. The area around the Lachlan, Macquarie, Murrumbidgee and Darling Rivers is the area traditionally inhabited by Wiradjuri speakers prior to the invasion and continues to be regarded as Wiradjuri country today. This rich riverine environment contributed to a highly developed economy for the Wiradjuri and continues to nurture Wiradjuri lifeways (Macdonald 2004:22; Macdonald 1986:4).

The Wiradjuri language was essentially an oral tradition. However, combined with other forms of communication such as hand signals, subtle body language and signs/symbols engraved or painted on surfaces within the landscape, on possum skin cloaks and human bodies, a very rich and detailed method of communication was developed (Green 2002:63). The spoken language is rich in vocabulary, grammar and structure with its own sounds and words (Grant & Rudder 2001). As with law and spirituality, language carries the culture of the Wiradjuri. They merge into one to provide the basis for communication, group cohesion,



identity and security. According to the ethnographer, R. H. Matthews (1896) the Bogan River Wiradjuri spoke a dialect of the Wiradjuri language called “Wonghibon”, whilst “the Castlereagh, the Mole and the Barwan” Wiradjuri spoke “Wailwan”.

Despite sharing a language, the Wiradjuri were not a single political unit ruled by a Chief. Rather, they were a confederacy of clans or family groups who shared a language, albeit with some local differences or dialects as detailed above, and a system of common beliefs. Politics operated at a local level and was informed by local senior men and women who had developed a broad and extensive range of skills and cultural knowledge. “Clever” men or women were those skilled in ritual knowledge and practices who would have been respected over a wide area but they were not Chiefs (Macdonald 2004). Leadership of a particular activity was undertaken by the person most qualified, such as the best speaker or warrior. As people’s expertise and reputations increased with age, they may have exerted influence over a broader area of networks cultivated throughout their life (Macdonald 2004:22). Descent passed through the female line with a “two moiety matrilineal social system” (Read 1983:8), that is, a person’s totem was different to their mother, but the same as their grandmother (Read 1983:8).

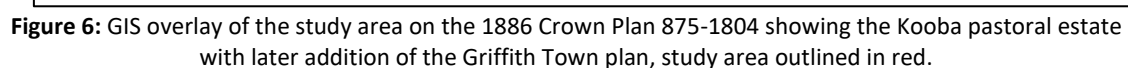
The Wiradjuri language speakers lived in family groups of husband and wife (or wives), their children and grandparents, adult sons and their wives and children. They were part of a larger autonomous clan group who had rights over a defined area or “home territory” within the broader Wiradjuri country. This was usually near permanent water (Matthews 1906:941; Read 1983:6; Pearson 1987:86). Each clan often identified themselves by the river around which they camped and which provided sustenance. Individuals would identify themselves as a “Boganer”, a “Lachlan woman” or from the Murrumbidgee (Macdonald 2001:2). Three major clans were recorded by Mathews (1906:941) as centring on Wellington, Mudgee-Rylstone and Bathurst. Howitt (1904:56) recorded three major clans at Narrandera, “Kutu-mundra” (now Cootamundra) and “Murring-balla” (now Murrumburrah). The Land Commissioner for the Lachlan region described three major clan groups on the south bank of the Lachlan, on the north bank of the Murrumbidgee and on the Booroowa River (Beckham 1853). Other clans included the Lachlan clan to the south-west of the Bathurst-Mudgee area, the Lower Macquarie clan to the north west, the Castlereagh clan to the north, and the Bogan clan to the west (Pearson 1984:66). The clan territories were estimated to contain a radius of approximately 40-48km (Mathews 1906:941; Pearson 1987:86). Each of these clans divided into smaller family groups for every day food procurement and living (Howitt 1996:208-2011).

Traditionally, these small self-contained family groups used the river flats and waterways as travelling routes to access resources on a seasonal basis. Their land provided all their economic and spiritual nourishment. It contained the water and food resources, shelter and the sacred sites necessary to their religious and ceremonial life. Small bough shelters were constructed for protection from the elements and used by family groups whilst travelling. They contained a simple frame of boughs or saplings placed upright in the ground in a semi-circular shape. The upper sections were tied together and covered with leaves, bark or grass (Kabaila 1999:120). Huts made of sheets of bark attached to timber supports were observed in the Yass area. A small fire was lit near the entry to these shelters for heating and cooking and wind breaks were erected (Green 2002:57-58). Evidence of Wiradjuri occupation can still be seen in the form of open artefact scatters, scarred and carved trees, hearths and bora grounds (AHIMS).

Availability of water and resources dictated movement, the location and intensity of occupation camps. The large rivers were the prime camping locations, however, wetlands provided good food resources and fresh water, whilst springs at various locations were suitable for localised seasonal camps. Rock holes also provided water as did “puddled stumps”, where a tree stump was hollowed out by fire and lined with clay and layered with small stones, to hold water. Boughs, bark or hollowed tree logs were placed into both the rock holes and puddled stumps to direct water into them (Gilmore 1935:36; Green 2002:72).

Wiradjuri food economy was focused on rivers, swamps, forests and their hinterlands. As Wiradjuri occupation was therefore centred on the major rivers, the Wiradjuri became known as “the river people”. Their procurement strategy was based on adaptive stability, determined by a deep knowledge of nature and countryside, and a careful approach to hunting and collecting. There is abundant evidence for advanced economic practices such as harvest rotation to ensure continuous supply of food, which also guaranteed a varied diet. Wiradjuri country was recognised by natural features which defined the boundaries and by spiritual sites which were associated with their ancestors (Comber 2019:10-15)

The first encounters of Europeans on Wiradjuri country occurred during the expeditions of explorers George Evans in 1813 (Turpin 1913), John Oxley in 1917 (Oxley 1964), Hamilton Hume and William Hovell in 1824 (Bland 1965), Charles Sturt in 1828-9 (Sturt 1982) and Thomas Mitchell 1835-1845 (Mitchell 1893). In the 1830s full-scale non-Aboriginal expansion commenced into Wiradjuri lands and was gradually taken over by farms, cattle stations and pastoral estates which moved down the river corridors. The second half of the 19th century was a time of great expansion into Wiradjuri country with almost every hectare being alienated (Comber 2019), including the study area which was located in the northern portion of the Kooba pastoral holding that housed an out-station widely referred to as Jondaryan.



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Cowra, Euabalong Reserve, Warangesda and Cumeragunja (Comber 2019:48-49). The table below provides further details:

Name	Location/s	Period of occupation	Characteristics
Warragesda	Darlington Point	1879-1924	Established as 'Aboriginal Station' by John Gribble, later converted to a mission managed by the 'Aborigines Protection Association / Board'. Appearance of a small village with a church.
Darlington Point Reserve	-	1924-1950s	After the dissolution of Waragesda people from the mission and people from other places camped together along the banks of the nearby Murrumbidgee river. Fibro shacks and corrugated iron houses with fibro floors; small church.
Wattle Hill, Leeton	1.8 km west of Leeton Cannery	1940s-1960s	Former cannery workers' fringe camp. After the end of WWII occupied extensively by Wiradjuri people. 4 streets of corrugated iron and bag huts. Bulldozed ahead of sub-development in 1968.
Griffith Town camps	The Pines Old Tip Golf Course Scenic Hill Wakaden Street Tharbogang Condo lane The Willows	1940s-1970s	Series of shanty towns made up of humpies and bag huts of seasonal workers throughout Griffith.
Frogs Hollow Marsh	Western edge of Griffith	1940s-1990s	Camp made of bag huts and tin humpies established during the labour shortages of WWII. Although shacks were pulled down in 1959 the area was populated by people into the 1990s.
Three ways	Adjacent to Frogs Hollow Marsh	1954-1980s	5 acres of land set aside as Aboriginal reserve. After the raising of Frogs Hollow Marsh people moved to Three ways. Housing scheme for Aboriginal people developed in the 1960s, comprising houses and tin huts; sewage since the 1970. Redeveloped as subdivision in the 1970.

Table 1: Detail of Aboriginal settlements and communities in the Griffith Area in the 20th century (Kabaila 2004: 34)

It is clear that the lives of people who had lived according to traditional ways in this area were catastrophically altered by European occupation and settlement over a century. Through perseverance and showing great resilience Aboriginal Australians including Wiradjuri descendants retained some of their core traditions, customs and beliefs, passing them onto future generations despite the significant changes imposed on their lives. In the 2016 Census, Griffith's population numbered 18,874. Aboriginal and/or Torres Strait Islander people made up 5.0% of the population. (2006 Census Stats www.abs.gov.au).

Wiradjuri people are represented by the Wiradjuri Council of Elders and each community has established their own form of governance to represent local interests. The Griffith Local Aboriginal Land Council represents the people in and around Griffith.



7.0 ENVIRONMENTAL CONTEXT

7.1 Topography, geology, soils and ecology

The study area is located within flat modified terrain in the fully developed town centre of Griffith NSW, approximately 700m south of the McPhersons Range/Scenic Hill Reserve. The present-day town is situated within the Cocoparra geological group, the local topography being characterised by flat to gently undulating plains of red and brown clayey sand, loam and lateritic soils. The underlying lithology is part of the Ravendale Terrestrial Basin and includes typical features such as the Rankin Formation, Mailman Gap Conglomerate Member, Womboyne Formation, Jimberoo Member, Melbergen Sandstone Member, Confreys Shale Member, Naradhan Sandstone, Barrat Conglomerate (Wynn 1977). Typical unmodified soil profiles within the study area would have comprised a 0-35 cm deep A horizon of red to yellowish clay sands to sandy clays overlying up to 1.6 m deep B horizons of medium clays (NSW Soil and Land 2020). Aboriginal objects within the study area would be concentrated within the A horizon soils.

The study area is located approximately 30 km north of the Murrumbidgee River and approximately 8 km west and north of Mirrool Creek, the largest permanent water source in the local area. Several ephemeral creek lines descending from the McPhersons Range/Scenic Hill Reserve are to be found approximately 700m north of the study area.

The study area has been cleared of endemic vegetation. Original vegetation communities throughout the study area have been identified as Inland Riverine Forests characterised by *Eucalyptus camaldulensis* (river red gum), occasionally with *E. largiflorens* (black box), *e. meliodora* (yellow box) or *E. macrocarpa* (grey box). The understorey would have comprised various shrubs and herbs and ferns (Keith 2006: 230-231). These vegetation communities provide habitat for a variety of animals such as kangaroos, wallabies, sugar gliders, possums, various lizards, snakes and birds – species hunted by past Aboriginal people as sources of food and raw materials for clothing, ornamentation, tools and implements (Attenbrow 2010).

7.2 Current land use and disturbance

Historic land modification of the study area possibly dates to the 1850s. The land was most likely cleared and used for grazing. The area surrounding the study area was described as 'Dense pine forest' by the 1886 Crown Plan 875-1804 (Figure 7), which may have referred to reforestation for logging.

Since the construction of the Griffith Base Hospital in the 1930s the study area has been actively developed and landscaped (Photograph 1). It is currently occupied by the buildings, carparking and landscaping of the Griffith Base Hospital. Whilst the development of the hospital has led to extensive development which has contributed to alterations to the original landscape, as most of the buildings on the site lack basements, the impact on Aboriginal archaeology would be minimal. Built areas in the central, northern and north western part of the study area demonstrate potential for introduced fill used for levelling of the respective construction sites which is likely to have capped and therefore protected remnant A horizon soils containing Aboriginal archaeology.



Photograph 1: Aerial photograph of the Griffith Base Hospital
(www.mlhd.health.nsw.gov.au)



7.3 Summary

The study area was originally located within an accessible terrain. The relative proximity of water sources and rich flora and fauna would have provided past Aboriginal people with ample opportunities for hunting, gathering and conducting of daily activities. The study area would have been suitable for human occupation and activities prior to historic settlement.

Historic occupation and landscaping, together with evidence for large scale construction activities since the 1940s indicate that soil profiles within the study area would have been partially modified yet original topsoils and A horizon soils are likely to be present in the study area. Whilst development may have disturbed surface evidence of occupation, it is possible that subsurface evidence will remain. It is likely that fill will exist on the site. Such fill would have been used to level the site prior to construction and would have protected subsurface archaeological deposits. Archaeological excavations throughout various urban areas in NSW clearly show that extensive subsurface evidence of Aboriginal occupation can remain despite later disturbance. Therefore, it can be predicted the study area would contain archaeological potential.



8.0 ARCHAEOLOGICAL CONTEXT

8.1 Regional

A search of the Aboriginal Heritage Information System (AHIMS) for the broader Griffith region indicated that only a small number of assessments had been undertaken within the region resulting in only a few sites being recorded. It should be noted that the small number of sites registered with AHIMS is a result of this lack of assessment, not a lack of potential Aboriginal archaeological sites.

Approximately 300km to the north east of Griffith at Cowra a large artefact scatter was recorded in respect of an extension to the Cowra sewerage treatment plant. Salvage excavations were undertaken and 34 artefacts retrieved (Comber & Stening 2009).

A ceremonial ground (Site 43-1-4) for which a report could not be located has been recorded near the town of Condobolin on a hill behind the hospital. It is described as consisting of about 120 low heaps of stones about 2m in diameter and 3-40cm in height. Condobolin is approximately 200km to the north of the study area.

Burials have been uncovered approximately 200km to the north of the study area near Condobolin. Webb (1986) undertook the investigation of a sand dune approximately 400m south of the Lachlan River. His investigation which resulted from the exposure of human remains from sand mining revealed the presence of human skeletal remains in association with artefactual material. Analysis indicated that this burial site may possibly date from the early Holocene. The fourteen artefacts located in association with the burials included a ground edged hatchet made from a river pebble, quartzite flakes and chert flakes and a chert blade. This site became known as "Hall's Burial" (after the then property owner) and is numbered 43-1-6 (AHIMS).

Another burial site is recorded at Goobang. It is a fenced protected area accessed from the North Forbes Road and located on Goobang Creek known as the "Goobang Burial site". A report relating to this site could not be located in the open section of the AHIMS. However a report by R Wright dated 1997 and titled "Report on Human Skeletal Remains from Condobolin in New South Wales", and a report titled "Aboriginal burials on the riverine plain of NSW" by T Bonhomme (1987) may relate to this site. Both of these reports were held in the restricted section and the consultant did not access them. Site No. 43-1-7 (Hacketts Burials, Goobang Creek, Condobolin) registered on the AHIMS relate to these reports. The site recording form records 43-1-7 as a site containing at least two burials located 4km from Condobolin on the Old North Forbes Road.

8.2 Griffith

A number of sites have been recorded in the vicinity of Griffith. An open campsite has been recorded at Narrandera which is only approximately 80km to the south east of Griffith. Approximately 10km to the north at Lake Wyangan and Tharbogang Swamp nine artefact scatters and six scarred trees have been recorded. To the east of Tharbogang Swamp another eight artefact scatters have been recorded. Four sites have been recorded at Yoogali which is approximately 6km north-east of Griffith. These consisted of two isolated finds and two artefact scatters which were subsequently collected as part of the State Significant Development of the Riverina Solar Project (RPS 2016a & b).

Within three kilometres of the study area the following sites have been recorded and are shown on Figure 8:

AHIMS No. and Name	Site Type
49-2-0013: Griffith Scenic Hill Reserve	Open artefact scatter
49-2-0161: Scrubby 3	Scarred Tree
49-2-0162: Scrubs ft 1	Scarred Tree
49-2-0163: Mulga ft 8	Scarred Tree
49-2-0164: Mulga ft 6	Hearth
49-2-0157: Mulga ft 1	Hearth
49-2-0158: Mulga ft 5	Scarred Tree
49-2-0158: Mulga ft 4	Hearth
49-2-0160: Road Tank 2	Hearth

Table 2: AHIMS sites within 3km of the study area

Hearths, artefact scatters and scarred trees are the most common types of Aboriginal sites in proximity to the study area. The

distribution of Aboriginal sites does not provide a detailed understanding of Aboriginal occupation within the region. Rather, it represents archaeological research and heritage assessment that have been undertaken. This lack of registered Aboriginal sites or places within the study area is due to the lack of assessments, rather than the lack of sites. It is possible that further unrecorded Aboriginal sites are present within and closer to the study area. However, despite the lack of assessments a number of Aboriginal sites have been recorded in the vicinity of the study area within a variety of environmental contexts. This indicates the possibility for evidence of subsurface Aboriginal objects to exist within the study area.

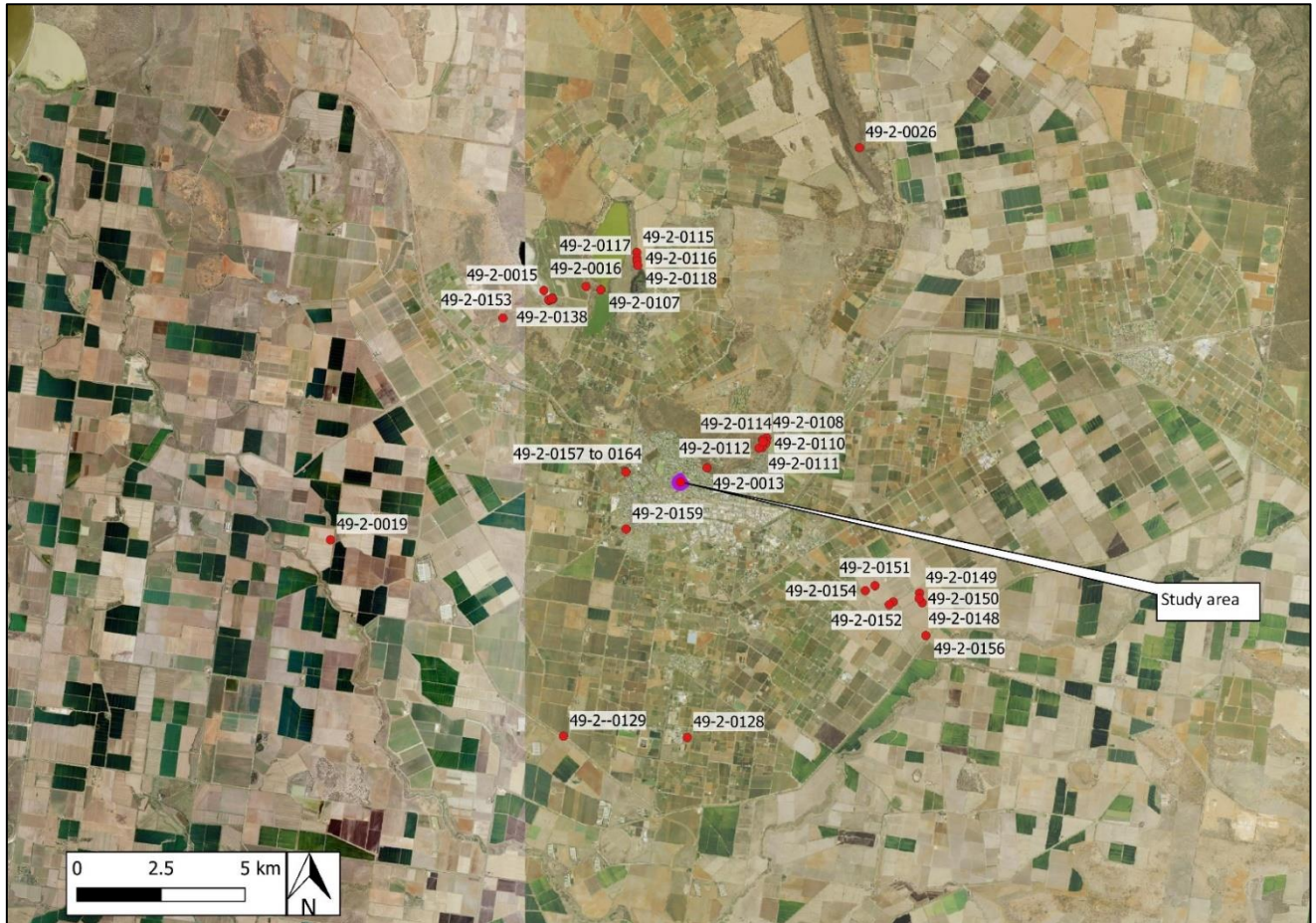


Figure 7: Location of AHIMS sites within the vicinity of the study area

8.2 The study area

There are no registered Aboriginal sites within the study area and the study area is not an Aboriginal place.

8.3 Site prediction

On the basis of the environmental and archaeological information detailed above it is expected that the statements could be made and the following site types could be located within the study area.

- The study area was originally located within an accessible landscape with ample resources therefore it would have been suitable for human occupation and daily activities.
- The study area has been cleared of all vegetation and natural resources, therefore the potential for rock shelters, scarred or carved trees, rock engravings or axe-grinding grooves is low.
- The study area has been extensively developed and landscaped, therefore the potential for surface Aboriginal archaeological lithics and artefacts is low.
- Introduction of fills for the levelling of the study area may have contributed to preservation of some original soil profiles throughout the study area, therefore the site contains the potential for subsurface archaeological deposits

9.0 RESULTS, IMPACTS & MITIGATION

9.1 Results

The study area was inspected on 4 December 2019 by Jillian Comber, Archaeologist, Kadibulla Khan, Archaeological Assistant and Christopher Jones, Archaeological Assistant. The study area was inspected on foot and photographs were taken.

The following key findings were made as a result of the inspection:

- The study area contains the Griffith Base Hospital buildings, parking and landscaped grounds. The ground surface consists of grassed and mulched areas, gardens and trees and therefore cannot be considered informative for the observation of surface Aboriginal artefacts. Ground surface visibility (GSV) has been assessed as nil.
- Due to the extensive land modification surface Aboriginal archaeological artefacts and lithics were not observed.
- Background research reveals a potential for subsurface archaeological deposits to be preserved beneath modern fills on site, therefore there is potential for subsurface archaeological deposits to be present within the study area.

Different areas of the hospital contained archaeological and five different locations have been determined to contain archaeological potential and are shown as PADs 1-5 on the map below.



Figure 8: Showing locations of PADs 1-5.

9.2 Effective survey coverage

Ground surface visibility (GSV) refers to the amount of bare ground visible during the field survey. The visibility of some site types, such as open artefact scatters, is dependent upon GSV and exposure. DPIE guidelines suggest that this information be presented in a table which quantifies and details the local detectability (DECCW 2010:19).

The entire study area has been developed and contains the existing Griffith Base Hospital buildings and landscaping. GSV throughout the study area was assessed as nil. Therefore, as GSV was nil, the recommended table was not used.



9.3 Impacts

The proposed development will involve extensive impact to the study area. The proposed works will involve extensive ground disturbance including, but not limited to:

- Demolition and clearing
- Cut and fill
- Construction of buildings
- Construction of service infrastructure

As the area has been assessed as having the potential to contain subsurface Aboriginal archaeological deposits, further measures will be required in order to mitigate potential impacts to Aboriginal heritage values.

9.4 Mitigation

As subsurface Aboriginal objects are predicted to exist within the study area, and it is an offence to harm such objects, testing and salvage excavations are proposed as a mitigation measure, as avoidance of the potential deposits is not possible.

The information gained from archaeological excavation contributes to our knowledge and understanding of Aboriginal occupation. This knowledge can then be passed down to future generations through educational programs and interpretation. Such strategies will contribute to building and maintaining social cohesion within the Aboriginal and broader community and protecting cultural values for future generations. Archaeological sites are valued by the Aboriginal community for more than their archaeological/scientific values. Such sites reflect both the physical and spiritual presence of ancestors on country. It is therefore important that as much information as possible is obtained to ensure recognition of Aboriginal heritage and to pass this information on to future generations.



10.0 SIGNIFICANCE ASSESSMENT

10.1 Preamble

Significance assessment is the process whereby sites or landscapes are assessed to determine their value or importance to the community.

A range of criteria have been developed for assessing the significance which embody the values contained in the Burra Charter. The Burra Charter provides principles and guidelines for the conservation and management of cultural heritage places within Australia.

Following are the criteria which will be used to assess the significance of the Griffith Base Hospital study area.

10.2 Criteria

Social Value (sometimes termed 'Aboriginal' value) which refers to the spiritual, traditional, historical or contemporary associations or attachments which the place or area has for the present-day Aboriginal community.

Historic Value refers to the associations of a place with a person, event, phase or activity of importance to the history of an Aboriginal community.

Scientific Value refers to the importance of a landscape, area, place or object because of its potential to provide information which is of value in scientific analysis and the ability to answer scientific or technical research questions.

Aesthetic Value refers to the sensory, scenic and creative aspects of the place.

Representativeness refers to whether the site demonstrates the principal characteristics of that site and is a good representative example of that site type.

Rarity refers to the degree to which such as site is known elsewhere and whether the site is uncommon, rare or endangered.

10.3 Assessment

Social Values

Consultation with representatives of the Aboriginal community indicates that the study area is important to the local and broader Aboriginal community. The artefacts predicted to be located on the site will provide evidence of Aboriginal occupation representing their past providing a direct link to their ancestors.

Historic Values

The study area is part of the history of Aboriginal people from before European occupation through to contact and dispossession.

Scientific Values

The study area has the potential to yield further information through detailed scientific and archaeological research into the nature of Aboriginal occupation and techniques utilised in subsistence activities. It has the potential to contain sub-surface archaeological deposits which could provide further information on Aboriginal land use techniques.

Aesthetic Values

The current site does not contain Aboriginal aesthetic values, however, after excavation the objects uncovered might meet this criteria.

Representative Values

Until the excavation has been completed it is not known if the site contains representative values.



Rarity Values

Until the excavation has been completed it is not known if the site contains rarity values.

10.4 Statement of Significance

Consultation with representatives of the Aboriginal community indicates that the study area is important to the local and broader Aboriginal community. The artefacts predicted to be located on the site will provide evidence of Aboriginal occupation representing their past providing a direct link to their ancestors and contributing to the history of Aboriginal occupation. The study area has the potential to yield further information through detailed scientific and archaeological research into the nature of Aboriginal occupation and techniques utilised in subsistence activities.



11.0 RECOMMENDATIONS

The following recommendations are made on the basis of:

- Legal requirements under the *National Parks & Wildlife Act 1974* (as amended) which states that it is an offence to harm or desecrate an Aboriginal object without first gaining the consent of the Director-General of the Department of Planning, Industry and Environment.
- Research into the environmental and archaeological background of the study area and its surroundings, as detailed in this report;
- Results of the site inspection and archaeological assessment as outlined in this report.

There is no objection to the proposed redevelopment of the Griffith Base Hospital in respect of Aboriginal archaeology, providing the following is undertaken:

1. Aboriginal consultation in accordance with DPIE's Aboriginal Cultural Heritage Consultation for Proponents 2010, which has commenced, should continue.
2. As subsurface Aboriginal objects are predicted to exist within the study area, and it is an offence to harm such objects, testing and salvage excavations should be undertaken in association with the Griffith Local Aboriginal Land Council. As this is an SSDA project, an AHIP will not be required.



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GLOSSARY

Adze: an axe like bifacial tool with a bevelled bit or blade edge usually used to work wood, or sometimes to dig for root crops.

Alluvium: material which is transported by a river and deposited at points along the flood plain of the river.

Artefact: any object made by human agency. All lithic tools and lithic debitage are considered artefacts.

Artefact scatter: also known as a surface scatter or open site, where prehistoric material such as artefacts and waste debris are lying exposed on the surface of the ground.

Assemblage: a collection of artefacts from an archaeological site.

Australian small tool tradition: a mid Holocene tool industry of the Australian Aborigines that appeared about 5,000 years ago when a new ensemble of small, flaked stone tools began to come into use. The types consisted of backed blades and flakes, Unifacial and bifacial points, and small adze flakes. There are some regional distributions of tools, including Bondi points, geometric microliths, Pirri points and Tula adzes.

Axe: a stone artefact that has been ground on one or more sides to produce a sharp edge.

Backed blade: a blade flake that has been abruptly retouched along one or more margins opposite an acute (sharp) edge. Backed pieces include backed blades and geometric microliths. They are thought to have been hafted onto wooden handles to produce composite cutting tools or spears. Backed blades are a feature of the “Australian small tool tradition”, dating from between 5,000 and 1,000 years ago in south eastern Australia (Mulvaney 1975).

Bifacial flaking or retouch: when flakes have been removed from two opposing faces.

Biomantle: the upper part of soil produced by biodynamical agents and processes of which bioturbation is normally hierarchically dominant. By definition, it contains at least 50% biofabric, a condition met in essentially all topsoils.

Bioturbation: the alteration of a site by non-human agency, eg. burrowing animals, tree and grass roots, insects

Blade: a flake that is at least twice as long as it is wide.

Bondi point: a small, asymmetric backed point, named after Bondi Beach where it was first found, which is a component of the Australian small tool tradition. It is usually less than 5cm long and is sometimes described as a backed blade.

Broad platform flake: a flake which has a platform which is as wide as, or wider than, the body of the flake.

Bulb of percussion: a rounded bulge where the force from the hammerstone has radiated through the stone and split it from the core.

Burin: a flake tool that was produced by the removal of two flakes at right angles to one another to produce a very fine sharp and durable edge.

Carved trees: trees which have had designs carved into the bark or heartwood and in some areas may have been used to mark burial or initiation sites.

Chert: a very fine crystalline aggregate of silica.

Context: the time and space setting of an artefact, feature or culture. The context of a find is its position on a site, its relationship through association with other artefacts, and its chronological position as revealed through stratigraphy. An artefact's context usually consists of its immediate matrix (the material surrounding it, eg. clay, gravel or sand), its provenience (horizontal and vertical position within the matrix), and its association with other artefacts (occurrence together with other archaeological remains, usually in the same matrix). The assessment of context includes study of what has happened to the find since it was deposited.



Core: a piece of stone bearing one or more negative (concave) flake scars. A stone which has obviously had flakes and flaked pieces struck from it.

Cortex: refers to the original weathered outer surface of the rock used to manufacture an artefact.

Debitage (debris): detached pieces that are discarded during the reduction process.

Distal end: the end opposite to the platform or the point end of a blade.

Dorsal surface: the 'back' of the artefact or the side that was once part of the outside of the core or shows evidence of previous flake removals.

Edge-ground artefact: an artefact (generally an axe or adze) whose cutting edges have been ground, rather than flaked, to form a sharp edge.

Eraillure scar: the small flake scar on the dorsal side of a flake next to the platform. It is the result of rebounding force during percussion flaking.

Erosion: the wearing away or loosening and transportation of soil or rock by water, wind and ice.

Fabricator: a stone or bone artefact used in the manufacture of other tools. Often rod shaped and worn heavily on one end, it is used to chip flakes from a core, or to retouch a flake.

Flake: any piece of stone removed from a larger mass (core) by application of force (percussion), and having a striking platform and bulb of percussion.

Flaked piece: any stone struck from a larger mass by percussion but not containing all or any of the characteristics of a flake.

Focal platform flake: a flake which has a platform narrower than the body of the flake.

Grinding groove: a depression resulting from the sharpening of stone tools such as axes and adzes, usually located on surfaces of fine homogenous sandstone and near water.

Grinding stone: a thick stone used as a mortar for grinding seeds, roots, tubers, or ochre.

Hammerstone: the stone that is used to remove flakes from the core.

Holocene: that portion of geologic time that postdates the latest episode of continental glaciation. The Holocene Epoch is synonymous with the recent or postglacial interval of Earth's geologic history and extends from 10,000 years ago to the present day. It was preceded by the Pleistocene Epoch and is part of the Quaternary Period, a time characterised by dramatic climatic oscillations from warm (interglacial) to cold (glacial) conditions that began about 1.6 million years ago. The term Holocene is also applied to the sediments, processes, events, and environments of the epoch.

Horizon (or soil horizon): the layers of the upper crust of the earth. The top, or O, horizon is the layer of undecomposed litter; the A horizon is topsoil, where most roots grow; B is the subsoil; and C is the parent rock material, broken into chunks. Although some roots can penetrate into the C horizon, few microorganisms live there.

Isolated find: a single stone artefact found on the surface of the land not in association with any other artefact.

Knapping: the process of hitting one stone (core) with another (hammerstone) to produce a flaked artefact.

Lamellate flaked piece: thin and wedge shaped, similar to a flake, but without the diagnostic features of a flake. A lamellate may be the distal end of a flake which has had its platform broken off.

Lithic: anything made of stone. Derived from the Greek word meaning stone or anything pertaining to stone.

Manuport: piece of stone intended to be, or used as, a core that has been carried to the area from somewhere else.



Microlith: a small (1 – 3cm long) flake with evidence of retouch. Bondi points, scrapers and backed blades are all types of microliths.

Midden: a prehistoric refuse site chiefly composed of shell fragments.

Multidirectional core: a lithic mass (core) with evidence of flaking originating from more than one direction and with more than a single striking platform.

Negative flake scar: the scar left by the removal of a flake. The scar may also show a rounded depression which is the negative of the bulb of percussion.

Open site: also known as a surface or artefact scatter, where prehistoric material such as artefacts and waste debris are lying exposed on the surface of the ground.

Pirri point: a symmetrical leaf-shaped point, up to 7cm long, unifacially flaked all over its dorsal surface. The striking platform and bulb of percussion are sometimes removed to produce a rounded, thinned butt. Pirri points are a component of the Australian small tool tradition, found generally in inland Australia. The term pirri is an Aboriginal word for 'wood engraving tool'.

Platform: the flat surface which receives percussion or pressure in the removal of a flake or flaked piece.

Pleistocene: a geochronological division of geological time, an epoch of the Quaternary period following the Pliocene. During the Pleistocene, large areas of the northern hemisphere were covered with ice and there were successive glacial advances and retreats. The lower Pleistocene began about 1.8 million years ago; the Middle Pleistocene about 730,000 years ago; and the Upper Pleistocene about 127,000 years ago; it ended about 10,000 years ago. The Pleistocene was succeeded by the Holocene.

Potential archaeological deposit (PAD): any location considered to have a moderate to high potential for subsurface archaeological material

Potlid: small circular piece of stone that has literally "popped off" the surface of the artefact due to exposure to extreme heat.

Proximal end: the 'top' of the artefact, or the part that the knapper hit to remove it from the core, where the platform is expected to be.

Quarry: a location from which stone has been extracted in order to make stone artefacts.

Retouch: refers to the secondary working of an artefact after it has been struck from the core. Retouch is used to sharpen the edges. It is the intentional modification of a stone tool edge by either pressure or percussion flaking techniques.

Scarred trees: trees from which bark has been removed for the manufacture of everyday items such as containers, canoes or shields.

Scraper: a generalised term used to describe a flake tool that has a retouched edge angle of approximately 60 to 90 degrees.

Silcrete: silica-rich duricrust identified by the presence of complete granules or even pebbles within the matrix.

Stratigraphy: the study and interpretation of the stratification of rocks, sediments, soils, or cultural debris, based on the principle that the lowest layer is the oldest and the uppermost layer is the youngest. The sequence of deposition can be assessed by a study of the relationships of different layers.

Taphonomy: Literally, 'the laws of burial'. In archaeology, it is the study of the processes by which archaeological remains are transformed by human and natural processes during their incorporation into archaeological deposits, their subsequent long-term preservation within those deposits, and their recovery by archaeologists. The aim is to understand the processes resulting in the archaeological record.

Thumbnail scraper: a small flake with a convex scraper edge, shaped like a thumbnail and located opposite the flake's platform. They exhibit unifacial retouch (usually on the ventral surface) and are usually less than 30mm in length.

Transect: an arbitrary sample unit which is a linear corridor of uniform specified width. A straight line or narrow sections through an archaeological site, along which a series of observations or measurements is made.



Tuff: a rock formed of volcanic fragments (generally ash).

Typology: a scheme to order multiple types in a relational manner. A common typology orders types in a hierarchical manner.

Unidirectional core: a core with only one striking platform surface and with flake scars extending in only one direction.

Unifacial flaking or retouch: where flakes have been removed from one face only.

Use-wear: the physical changes to the edges of an artefact as a result of its use. Modification of a tool resulting from its use.

Ventral surface: the 'front' of the artefact, or the side that was once part of the interior of the core.



APPENDIX A: AHIMS SEARCH



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : Griffith ACHAR

Client Service ID : 466728

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
49-2-0013	Griffith Scenic Hill Reserve	AGD	55	412780	6206600	Open site	Valid	Artefact : -	Open Camp Site	890
	Contact									
	Recorders									
49-2-0161	Scrubby 3	GDA	55	410367	6204770	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	Contact									
	Recorders									
49-2-0162	Scrubs ft 1	GDA	55	410367	6204770	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	Contact									
	Recorders									
49-2-0163	Mulga ft 8	GDA	55	410367	6204770	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	Contact									
	Recorders									
49-2-0164	Mulga ft 6	GDA	55	410367	6204770	Open site	Valid	Hearth : -		
	Contact									
	Recorders									
49-2-0157	Mulga ft 1	GDA	55	410367	6204770	Open site	Valid	Hearth : -		
	Contact									
	Recorders									
49-2-0158	Mulga ft5	GDA	55	410367	6204770	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	Contact									
	Recorders									
49-2-0159	Mulga ft 4	GDA	55	410367	6204770	Open site	Valid	Hearth : -		
	Contact									
	Recorders									
49-2-0160	Road tank 2	GDA	55	410367	6204770	Open site	Valid	Hearth : -		
	Contact									
	Recorders									

Report generated by AHIMS Web Service on 22/11/2019 for Dragomir Garbov for the following area at Lat, Long From : -34.3011, 146.0204 - Lat, Long To : -34.2629, 146.0667 with a Buffer of 0 meters. Additional Info : Griffith Hospital ACHAR. Number of Aboriginal sites and Aboriginal objects found is 9

This information is not guaranteed to be free from error omission. Office of Environment and Heritage (NSW) and its employees disclaim liability for any act done or omission made on the information and consequences of such acts or omission.



ARCHAEOLOGY - HERITAGE - MEDIATION - ARBITRATION

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APPENDIX C: ARCHAEOLOGICAL TESTING REPORT

ARCHAEOLOGY – HERITAGE – MEDIATION – ARBITRATION

GRIFFITH BASE HOSPITAL

Aboriginal Archaeological Test Excavation Report

PREPARED BY	DR JILLIAN COMBER & VERONICA NORMAN
REPORT TO	HEALTH INFRASTRUCTURE NSW
LGA	GRIFFITH
VERSION NO	D.2020
DATE	JANUARY 2021

DOCUMENT CONTROL

PROJECT NO.: CB374 STATUS: FINAL

REV	DATE	PREPARED	EDITED	APPROVED
A	4/6/2020	Jillian Comber and Veronica Norman	Jillian Comber	Jillian Comber
B	18/6/2020	Jillian Comber and Veronica Norman	Jillian Comber	Jillian Comber
C	10/8/2020	Jillian Comber and Veronica Norman	Jillian Comber	Jillian Comber
D	24/01/2021	Dr Jillian Comber and Veronica Norman	Dr Jillian Comber	Dr Jillian Comber

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EXECUTIVE SUMMARY

NSW Health Infrastructure are undertaking a redevelopment of the Griffith Base Hospital. The project will provide expanded inpatient, surgical, ambulatory care and critical care services to Griffith Base Hospital. It will also enable the consolidation of several ageing and dislocated buildings into an integrated and contemporary healthcare facility.

To ensure that the Aboriginal archaeological significance of the study area is not adversely impacted upon by the proposal, Comber Consultants were commissioned to undertake an Aboriginal Archaeological Assessment. That report was prepared in accordance with the Department of Planning, Industry and Environment's (DPIE's) *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*. That report assessed the study area to contain subsurface Aboriginal archaeological potential and recommended archaeological test excavation be undertaken.

Aboriginal archaeological test excavations were undertaken from 5/5/2020 to 14/5/2020 in accordance with DPIE's *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* and the Research Design prepared by Jillian Comber dated 16 April 2020 Version A which is attached as Appendix A. Test excavations uncovered 271 artefacts across five Potential Archaeological Deposits (PADs) located across Griffith Base Hospital. The site has now been registered on the Aboriginal Heritage Information Management System (AHIMS 49-2-0180).

This report makes the following recommendations:

1. An application for an Aboriginal Heritage Impact Permit, with salvage for PADs 1 and 2, should be submitted to DPIE.
2. Once the permit has been received, Aboriginal archaeological salvage of PADs 1 and 2, should be undertaken. Once that has been completed the redevelopment can proceed.
3. Salvage is not required for PADs 3-5, as sufficient information has been gained from those PADs to characterise occupation within those areas.
4. The final repository for the artefacts should be with the Griffith Local Aboriginal Land Council.
5. Aboriginal community consultation should continue.
6. An interpretation strategy and plan should be developed which interprets the results of the archaeology and the Aboriginal history of the region. This should be in partnership with the Griffith Local Aboriginal Land Council.



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1.0 INTRODUCTION

1.1 Background

NSW Health Infrastructure are undertaking the redevelopment of the Griffith Base Hospital. The project will provide expanded inpatient, surgical, ambulatory care and critical care services to Griffith Base Hospital. It will also enable the consolidation of several ageing and dislocated buildings into an integrated and contemporary healthcare facility.

To ensure that the Aboriginal archaeological significance of the study area is not adversely impacted upon by the proposal, Comber Consultants were commissioned to undertake an Aboriginal archaeological assessment. That report was prepared in accordance with the Department of Planning, Industry and Environment's (DPIE's) *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*. That report assessed the study area to contain subsurface Aboriginal archaeological potential and recommended Aboriginal consultation and archaeological test excavation be undertaken (Comber & Garbov 2020).

Accordingly, consultation was undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Guidelines for Proponents 2010* (Garbov 2020) and Aboriginal archaeological test excavations were undertaken. The excavations were undertaken from 5/5/2020 to 14/5/2020 in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* and the Research Design prepared by Jillian Comber dated 16 April 2020 Version A which is attached as Appendix A. Test excavations uncovered 271 artefacts across five Potential Archaeological Deposits (PADs) located across Griffith Base Hospital. This report details the results of the test excavations.

1.2 Location

The city of Griffith lies within the Murrumbidgee Irrigation Area, in the north western Riverina region of New South Wales, approximately 480km west of Sydney and is located within the Griffith City Council Local Government Area (LGA) (Figure 1).

The Griffith Base Hospital is located at 5-39 Animoo Avenue, Griffith NSW and is known as Lot 2 DP, 1043580 (Figure 2).



Figure 1: Location of Griffith within New South Wales



Figure 2: Location of study area within Griffith NSW



1.3 Investigators and Contributors

Fieldwork

Comber Consultants

- Jillian Comber, B.A., Litt B. Project Director
- Veronica Norman, B.A., M.Herit.Cons, Senior Archaeologist
- Glenn Suey, Dip Aboriginal Archaeology, Archaeologist
- Chris Jones, Archaeological Assistant
- Kadibulla Khan, Archaeological Assistant
- Rivers McEwen, Archaeological Assistant
- Storm McEwen-Gillespie, Archaeological Assistant

Griffith Local Aboriginal Land Council

- David Watts
- Kindanna Williams
- Jacinta Simpson

Artefact Analyses

The artefacts analyses included at Appendix B and the summary included in this report was undertaken by Dr Beth White B.A (Hons)., M.Phil, PhD.

Report

This report was prepared by Dr Jillian Comber, Archaeologist and Veronica Norman, Archaeologist with contributions from the above.

1.4 Acknowledgements

The assistance of the following is gratefully acknowledged:

- Stephen Young, Griffith Local Aboriginal Land Council
- Ajuna Thiru Moorthy, Health Infrastructure
- Ray Greig, Griffith Base Hospital
- Teasha Crotty, Crotty Excavations



2.0 LEGISLATION

2.1 Environmental Planning & Assessment Act 1979

Section 4.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) states that if an environmental planning instrument (EPI) provides that development may be carried out **without the need for development consent**, a person may carry the development out, in accordance with the EP&A, on land to which the provision applies. The project becomes an 'activity' for the purposes of Part 5 of the EP&A Act and is subject to an environmental assessment (Review of Environmental Factors).

The *State Environmental Planning Policy (Infrastructure) 2007* (ISEPP) is aimed at streamlining the delivery of infrastructure carried out by, or on behalf of, a public authority. In accordance with Clause 58 (1) of the ISEPP, the proposed demolition and construction works may be carried out **without development consent** and therefore comprises an 'activity' under Part 5 of the EP&A Act.

As part of the obligations under Part 5 of the EP&A Act, Health Infrastructure is required to take into account, to the fullest extent possible, all matters likely to affect the environment.

2.2 National Parks & Wildlife Act 1974

The *National Parks & Wildlife Act 1974* (NPW Act) provides statutory protection to all Aboriginal sites within New South Wales. The Office of Environment & Heritage (OEH) is the State Government agency responsible for the implementation and management of this Act.

Part 6 of the *National Parks & Wildlife Act* states that it is an offence to harm or desecrate an Aboriginal object or Aboriginal place, without an Aboriginal Heritage Impact Permit (AHIP). An Aboriginal object is defined as:

Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.

An Aboriginal Place is defined as:

A place that, in the opinion of the Minister, is or was of special significance with respect to Aboriginal culture, to be an Aboriginal place for the purposes of this Act.

The National Parks & Wildlife Regulations detail the provisions for undertaking archaeological testing which are further outlined in *The Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* and *The Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. If there is the possibility that Aboriginal objects exist within the study area then limited subsurface archaeological testing must be undertaken in consultation with the Registered Aboriginal Parties. The aim of the testing is to determine the nature and extent of the Aboriginal objects. This testing can be undertaken without an AHIP. Prior to undertaking such testing Aboriginal consultation must be undertaken in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*.

As the study area was identified as being located within an area of archaeological sensitivity with the potential to contain Aboriginal objects, archaeological test excavation was undertaken in May 2020 in accordance with DPIE's *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*. Aboriginal artefacts were retrieved during the excavations. As a result of the testing Aboriginal objects were uncovered. Therefore, the following must be undertaken:

- Aboriginal community consultation should continue.
- An application for an AHIP for harm, with salvage should be submitted to Heritage NSW.
- Once the permit has been received Aboriginal archaeological salvage should be undertaken. Once that has been completed the redevelopment can proceed.



3.0 PROPOSAL

The original buildings of the Griffith Base Hospital were constructed in 1931 and have since been altered and extended many times and new buildings constructed. The first extensions/new building works commenced in 1935 and continued until 1999. The need for the redevelopment is to improve efficiencies across the hospital, improve aging infrastructure and address the changing models of healthcare to meet future growth and demand.

The proposed works are detailed below and shown on Figures 3-5.

- Demolition of Buildings 1, 2, 6, 9, 15, 16, 17, 19, 20, 22, 25, 28 29, 31 and 35
- Construction of new clinical services building
- Construction of new western car park
- Construction of new main car park
- Demolition of temporary car park
- Landscaping work



Figure 3: Current layout of Griffith Base Hospital (DJRD)

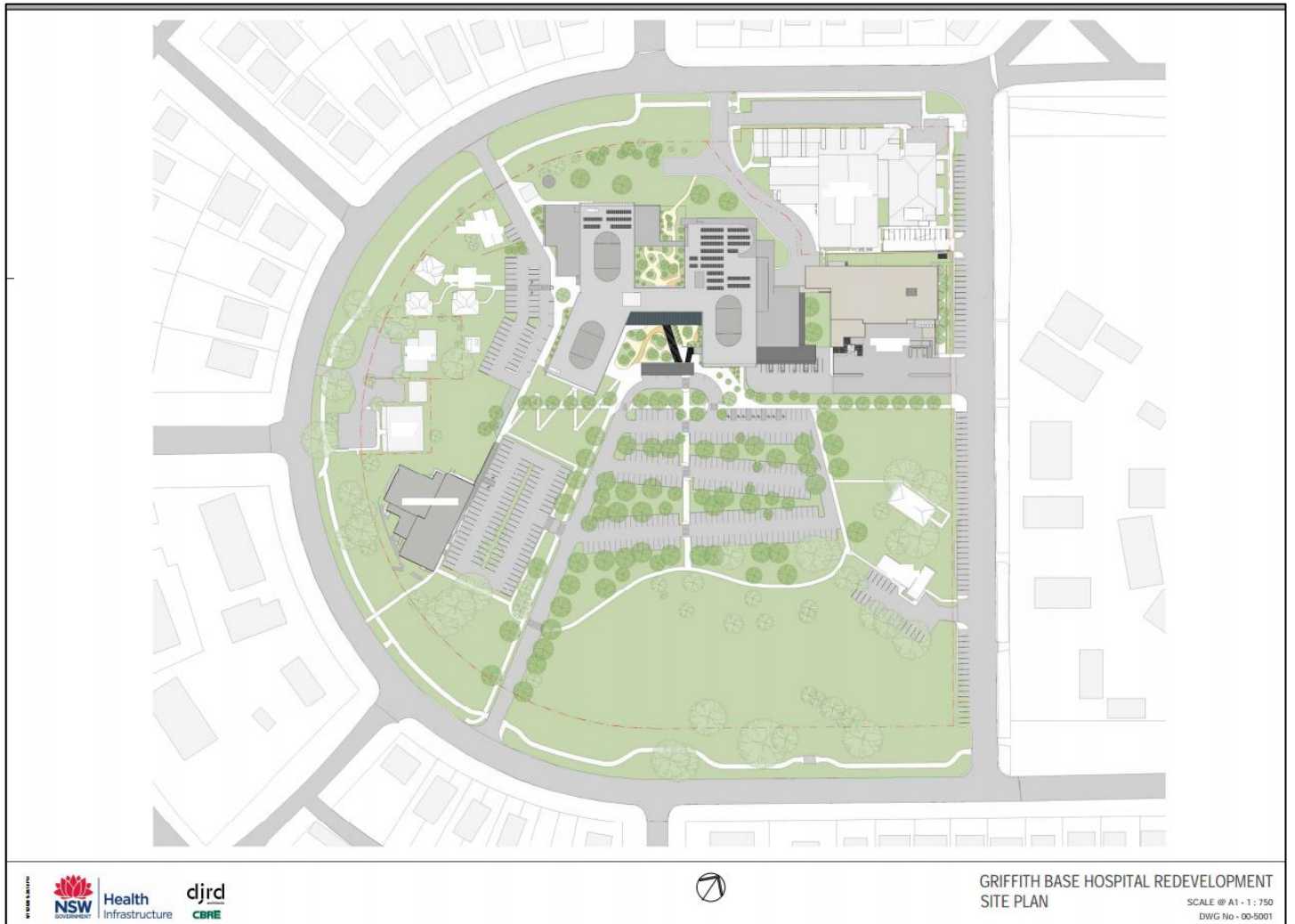


Figure 4: Griffith Base Hospital demolition works (DJRD)



4.0 ABORIGINAL CONSULTATION

Aboriginal culture is dynamic and continuous. It includes the tangible and intangible and links people over time to their community and land. It is important to recognise that Aboriginal people have the right to protect, preserve and promote their cultural heritage. In recognition of that right, Aboriginal community consultation was undertaken in accordance with DPIE's *Aboriginal Cultural Heritage Consultation Guidelines for Proponents 2010*. For full details of the consultation please refer to the Aboriginal Cultural Heritage Assessment Report prepared by Comber Consultants.

The Registered Aboriginal Party (RAP), Griffith Local Aboriginal Land Council (GLALC) was invited to take part in the test excavation and participated fully. Their Site Officer participated in the program of testing and Stephen Young, the CEO of the GLALC, attended daily to discuss progress.

The results of the testing were discussed in detail with Stephen Young who agreed that salvage excavation of PADs 1-2 should be undertaken prior to the commencement of the proposed redevelopment. The GLALC have indicated that the results of the testing are very important to the Aboriginal community and have requested that all artefacts retrieved during test and salvage excavations be returned to GLALC for safekeeping at the conclusion of the project. This report was forwarded to the GLALC and their letter in support of the recommendations contained in this report is attached at Appendix C.

The GLALC will be invited to participate in any further fieldwork and consultation will be ongoing with the GLALC throughout this project.

5.0 ABORIGINAL HISTORY

Griffith is located within the western portion of Wiradjuri country. Wiradjuri country is located in central New South Wales and encompasses an area of over 80,000 square kilometres making it one of the largest Aboriginal language regions in Australia (Macdonald 2004:22). See 5. The term Wiradjuri can refer to the people, their language or the geographical area designated as Wiradjuri Country (Macdonald 1986:3). Where once it may have clearly referred to a language group, today Wiradjuri people are defined by an extensive kin network (Macdonald 1986; Read 1983:xii) and by their cultural heritage.

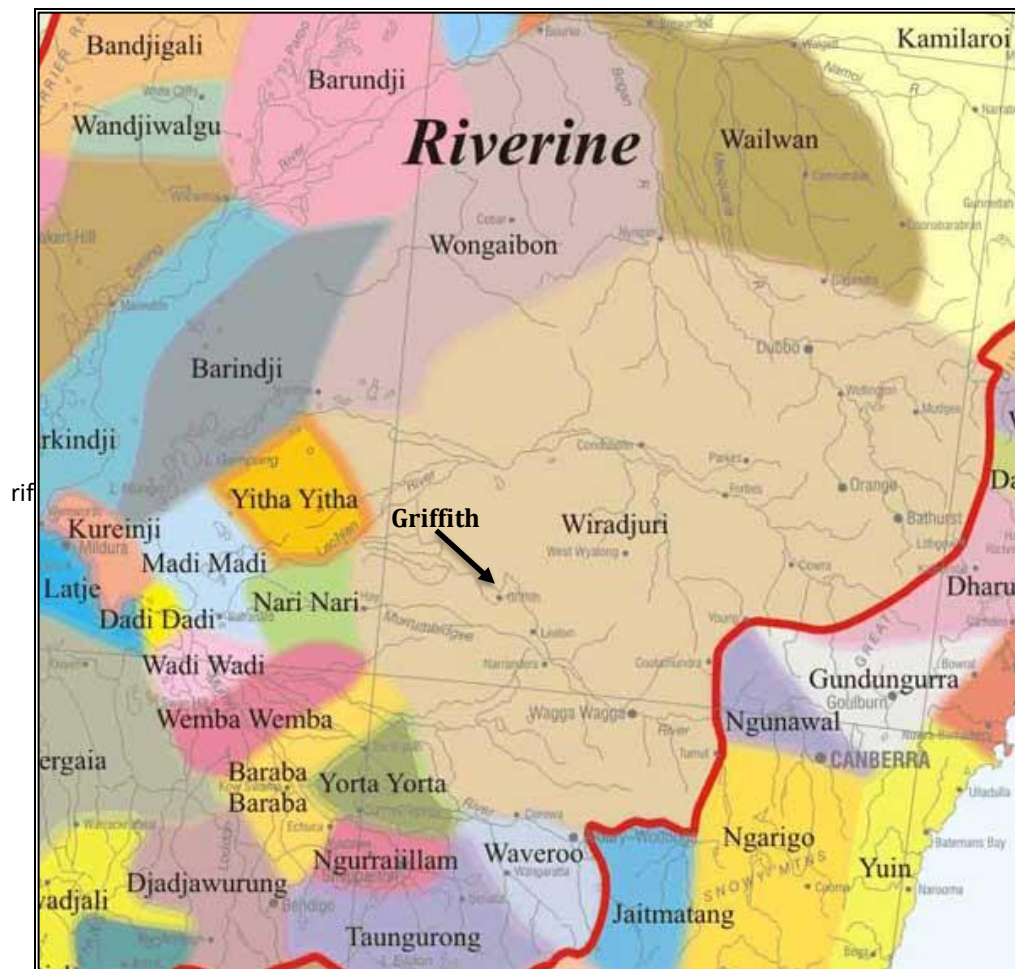


Figure 5: Showing the location of the Wiradjuri Nation within the Riverina (Horton 1996)

Wiradjuri country includes part of the Riverina region on the central west slopes and plains of New South Wales and extends from Nyngan to Albury, and Bathurst to Hay (Horton 1994(2):1189; Macdonald 2004:22) (Figure). Wiradjuri people refer to their land as “The Country of the Three Rivers”, with the watershed of the Macquarie, Lachlan and Murrumbidgee Rivers forming the boundaries. The Macquarie River in the north was known to the Wiradjuri as “Wambool”; the Lachlan River, which was known to the Wiradjuri as “Kalar”, is to the west and the Murrumbidgee, which retains its traditional Wiradjuri name, flows to the south. The Macquarie meets the Barwon and flows west into the Darling River and then flows south. The area around the Lachlan, Macquarie, Murrumbidgee and Darling Rivers is the area traditionally inhabited by Wiradjuri speakers prior to the invasion and continues to be regarded as Wiradjuri country today. This rich riverine environment contributed to a highly developed economy for the Wiradjuri and continues to nurture Wiradjuri lifeways (Macdonald 2004:22; Macdonald 1986:4).

The Wiradjuri language was essentially an oral tradition. However, combined with other forms of communication such as hand signals, subtle body language and signs/symbols engraved or painted on surfaces within the landscape, on possum skin cloaks and human bodies, a very rich and detailed method of communication was developed (Green 2002:63). The spoken language is



rich in vocabulary, grammar and structure with its own sounds and words (Grant & Rudder 2001). As with law and spirituality, language carries the culture of the Wiradjuri. They merge into one to provide the basis for communication, group cohesion, identity and security. According to the ethnographer, R. H. Matthews (1896) the Bogan River Wiradjuri spoke a dialect of the Wiradjuri language called “Wonghibon”, whilst “the Castlereagh, the Mole and the Barwan” Wiradjuri spoke “Wailwan”.

Despite sharing a language, the Wiradjuri were not a single political unit ruled by a Chief. Rather, they were a confederacy of clans or family groups who shared a language, albeit with some local differences or dialects as detailed above, and a system of common beliefs. Politics operated at a local level and was informed by local senior men and women who had developed a broad and extensive range of skills and cultural knowledge. “Clever” men or women were those skilled in ritual knowledge and practices who would have been respected over a wide area but they were not Chiefs (Macdonald 2004). Leadership of a particular activity was undertaken by the person most qualified, such as the best speaker or warrior. As people’s expertise and reputations increased with age, they may have exerted influence over a broader area of networks cultivated throughout their life (Macdonald 2004:22). Descent passed through the female line with a “two moiety matrilineal social system” (Read 1983:8), that is, a person’s totem was different to their mother, but the same as their grandmother (Read 1983:8).

The Wiradjuri language speakers lived in family groups of husband and wife (or wives), their children and grandparents, adult sons and their wives and children. They were part of a larger autonomous clan group who had rights over a defined area or “home territory” within the broader Wiradjuri country. This was usually near permanent water (Matthews 1906:941; Read 1983:6; Pearson 1987:86). Each clan often identified themselves by the river around which they camped and which provided sustenance. Individuals would identify themselves as a “Boganer”, a “Lachlan woman” or from the Murrumbidgee (Macdonald 2001:2). Three major clans were recorded by Mathews (1906:941) as centring on Wellington, Mudgee-Rylstone and Bathurst. Howitt (1904:56) recorded three major clans at Narrandera, “Kutu-mundra” (now Cootamundra) and “Murring-balla” (now Murrumburrah). The Land Commissioner for the Lachlan region described three major clan groups on the south bank of the Lachlan, on the north bank of the Murrumbidgee and on the Booroowa River (Beckham 1853). Other clans included the Lachlan clan to the south-west of the Bathurst-Mudgee area, the Lower Macquarie clan to the north west, the Castlereagh clan to the north, and the Bogan clan to the west (Pearson 1984:66). The clan territories were estimated to contain a radius of approximately 40-48km (Mathews 1906:941; Pearson 1987:86). Each of these clans divided into smaller family groups for every day food procurement and living (Howitt 1996:208-2011).

Traditionally, these small self-contained family groups used the river flats and waterways as travelling routes to access resources on a seasonal basis. Their land provided all their economic and spiritual nourishment. It contained the water and food resources, shelter and the sacred sites necessary to their religious and ceremonial life. Small bough shelters were constructed for protection from the elements and used by family groups whilst travelling. They contained a simple frame of boughs or saplings placed upright in the ground in a semi-circular shape. The upper sections were tied together and covered with leaves, bark or grass (Kabaila 1999:120). Huts made of sheets of bark attached to timber supports were observed in the Yass area. A small fire was lit near the entry to these shelters for heating and cooking and wind breaks were erected (Green 2002:57-58). Evidence of Wiradjuri occupation can still be seen in the form of open artefact scatters, scarred and carved trees, hearths and bora grounds (AHIMS).

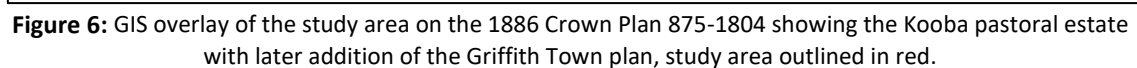
Availability of water and resources dictated movement, the location and intensity of occupation camps. The large rivers were the prime camping locations, however, wetlands provided good food resources and fresh water, whilst springs at various locations were suitable for localised seasonal camps. Rock holes also provided water as did “puddled stumps”, where a tree stump was hollowed out by fire and lined with clay and layered with small stones, to hold water. Boughs, bark or hollowed tree logs were placed into both the rock holes and puddled stumps to direct water into them (Gilmore 1935:36; Green 2002:72).

Wiradjuri food economy was focused on rivers, swamps, forests and their hinterlands. As Wiradjuri occupation was therefore centred on the major rivers, the Wiradjuri became known as “the river people”. Their procurement strategy was based on adaptive stability, determined by a deep knowledge of nature and countryside, and a careful approach to hunting and collecting. There is abundant evidence for advanced economic practices such as harvest rotation to ensure continuous supply of food, which also guaranteed a varied diet. Wiradjuri country was recognised by natural features which defined the boundaries and by spiritual sites which were associated with their ancestors (Comber 2019:10-15)

The first encounters of Europeans on Wiradjuri country occurred during the expeditions of explorers George Evans in 1813 (Turpin 1913), John Oxley in 1917 (Oxley 1964), Hamilton Hume and William Hovell in 1824 (Bland 1965), Charles Sturt in 1828-



9 (Sturt 1982) and Thomas Mitchell 1835-1845 (Mitchell 1893). In the 1830s full-scale non-Aboriginal expansion commenced into Wiradjuri lands and was gradually taken over by farms, cattle stations and pastoral estates which moved down the river corridors. The second half of the 19th century was a time of great expansion into Wiradjuri country with almost every hectare being alienated (Comber 2019), including the study area which was located in the northern portion of the Kooba pastoral holding that housed an out-station widely referred to as Jondaryan (Figure).





As a result of colonisation *The Aborigines Protection Act 1909* was introduced to contain and control Aboriginal people. The Act, which was finally rescinded in 1960, introduced a number of managed and unmanaged Reserves on to which Aboriginal people were forcibly moved onto. The nearest reserve to Griffith was at Darlington Point. Other reserves include Erarnbie Reserve near Cowra, Euabalong Reserve, Warangesda and Cumeragunja (Comber 2019:48-49). Table 1 below provides further details:

Name	Location/s	Period of occupation	Characteristics
Warragesda	Darlington Point	1879-1924	Established as 'Aboriginal Station' by John Gribble, later converted to a mission managed by the 'Aborigines Protection Association / Board'. Appearance of a small village with a church.
Darlington Point Reserve	-	1924-1950s	After the dissolution of Waragesda people from the mission and people from other places camped together along the banks of the nearby Murrumbidgee river. Fibro shacks and corrugated iron houses with fibro floors; small church.
Wattle Hill, Leeton	1.8 km west of Leeton Cannery	1940s-1960s	Former cannery workers' fringe camp. After the end of WWII occupied extensively by Wiradjuri people. 4 streets of corrugated iron and bag huts. Bulldozed ahead of sub-development in 1968.
Griffith Town camps	The Pines Old Tip Golf Course Scenic Hill Wakaden Street Tharbogang Condo lane The Willows	1940s-1970s	Series of shanty towns made up of humpies and bag huts of seasonal workers throughout Griffith.
Frogs Hollow Marsh	Western edge of Griffith	1940s-1990s	Camp made of bag huts and tin humpies established during the labour shortages of WWII. Although shacks were pulled down in 1959 the area was populated by people into the 1990s.
Three ways	Adjacent to Frogs Hollow Marsh	1954-1980s	5 acres of land set aside as Aboriginal reserve. After the raising of Frogs Hollow Marsh people moved to Three ways. Housing scheme for Aboriginal people developed in the 1960s, comprising houses and tin huts; sewage since the 1970. Redeveloped as subdivision in the 1970.

Table 1: Detail of Aboriginal settlements and communities in the Griffith Area in the 20th century (Kabaila 2004: 34)

It is clear that the lives of people who had lived according to traditional ways in this area were catastrophically altered by European occupation and settlement over a century. Through perseverance and showing great resilience Aboriginal Australians including Wiradjuri descendants retained some of their core traditions, customs and beliefs, passing them onto future generations despite the significant changes imposed on their lives. In the 2016 Census, Griffith's population numbered 18,874. Aboriginal and/or Torres Strait Islander people made up 5.0% of the population (2006 Census Stats www.abs.gov.au).

Wiradjuri people are represented by the Wiradjuri Council of Elders and each community has established their own form of governance to represent local interests. The Griffith Local Aboriginal Land Council represents the people in and around Griffith.



6.0 ENVIRONMENTAL CONTEXT

6.1 Topography

The study area is located within flat modified terrain in the fully developed town centre of Griffith NSW, approximately 700m south of the McPhersons Range/Scenic Hill Reserve. The present-day town is situated within the Cocoparra geological group, the local topography being characterised by flat to gently undulating plains of red and brown clayey sand, loam and lateritic soils.

The study area is located approximately 30 km north of the Murrumbidgee River and approximately 8 km west and north of Mirrool Creek, the largest permanent water source in the local area. Several ephemeral creek lines descending from the McPhersons Range/Scenic Hill Reserve are to be found approximately 700m north of the study area.

The hospital is located on a small hill overlooking the town of Griffith and the ephemeral creek lines. Prior to construction of the hospital the top of the hill was levelled to provide a flat area suitable for construction. It is possible that during the levelling any Aboriginal objects on the crest of the hill were removed or displaced.

6.2 Geology

The underlying lithology is part of the Ravendale Terrestrial Basin and includes typical features such as the Rankin Formation, Mailman Gap Conglomerate Member, Womboyne Formation, Jimberoo Member, Melbergen Sandstone Member, Confreys Shale Member, Naradhan Sandstone, Barrat Conglomerate (Wynn 1977). These formations provide fine grained siliceous material such as quartzite, chert and rhyolite pebbles. These pebbles are generally less than 64mm in size. Larger cobble and boulder sizes occurred at specific sites some distance from the study area. The artefacts retrieved from the site indicates that smaller pebbles had been used to manufacture artefacts using a bipolar flaking technique. Bipolar flaking is a preferred technique when large cobbles are not available, as it is much easier to work with small pebbles

A large quantity of introduced red gravels were identified within the study area. According to Ray Greig, gardener at Griffith Hospital for over 30 years, these gravels came from the Warburn Quarry which is approximately 19km to the north of the hospital. A large raised garden bed was located in the north-western corner of PAD 2 in a half moon shape. The red gravels were introduced to this garden bed for the aesthetics and drainage qualities. The garden bed was created in the 1970s and demolished when the carpark immediately to the north of PAD 2 was recently extended south.

According to Ray Greig, at the Warburn Quarry, the gravels were first washed and then mechanically sorted into size. The gravels imported to Griffith Base Hospital were very small in size. Artefacts were found amongst these gravels.

Immediately to the west of the quarry is the Barren Box Swamp which is part of the Mirrool Creek System. This would have provided a very rich resource for the Wiradjuri and it is possible that the gravels were quarried from this area, and that the quarried material contained artefacts.

6.3 Vegetation

The study area has been cleared of endemic vegetation and is currently a landscaped environment which includes various garden beds, open grassed areas, concrete/asphalt parking lots and footpaths.

Original vegetation communities throughout the study area have been identified as Inland Riverine Forests characterised by *Eucalyptus camaldulensis* (river red gum), occasionally with *E. largiflorens* (black box), *E. meliodora* (yellow box) or *E. macrocarpa* (grey box). The understorey would have comprised various shrubs and herbs and ferns (Keith 2006: 230-231). These vegetation communities provide habitat for a variety of animals such as kangaroos, wallabies, sugar gliders, possums, various lizards, snakes and birds – species hunted by past Aboriginal people as sources of food and raw materials for clothing, ornamentation, tools and implements (Attenbrow 2010).



6.4 Current land use and disturbance

Historic land modification of the study area possibly dates to the 1850s. The land was most likely cleared and used for grazing. The area surrounding the study area was described as 'Dense pine forest' by the 1886 Crown Plan 875-1804 (Figure 7), which may have referred to reforestation for logging.

Since the construction of the Griffith Base Hospital in the 1930s the study area has been actively developed and landscaped (Photograph 1). It is currently occupied by the buildings, carparking and landscaping of the Griffith Base Hospital.

Test excavation revealed varying levels of ground disturbance located across the hospital. PAD 1, located in the grassed area adjacent to Noorebar Avenue, appeared fairly intact with minimal ground disturbance. Tree roots were located in some trenches. PAD 2, located within the grassed area directly north of PAD 1, showed higher levels of ground disturbance with concentrations of introduced gravels in the north western portion of the PAD within a raised mound. Services, modern rubbish and fill were noted in various trenches within PAD 2. PAD 3 contained a service within the trench and showed signs of previous ground disturbance overlying natural soils. PAD 4 exhibited moderate levels of ground disturbance and included some modern materials. PAD 5 exhibited some ground disturbance in the form of modern materials, tree roots and asbestos.



7.0 ARCHAEOLOGICAL CONTEXT

7.1 Regional

A search of the Aboriginal Heritage Information System (AHIMS) for the broader Griffith region indicated that only a small number of assessments had been undertaken within the region resulting in only a few sites being recorded. It should be noted that the small number of sites registered with AHIMS is a result of this lack of assessment, not a lack of potential Aboriginal archaeological sites.

Approximately 300km to the north east of Griffith at Cowra a large artefact scatter was recorded in respect of an extension to the Cowra sewerage treatment plant. Salvage excavations were undertaken, and 34 artefacts retrieved (Comber & Stening 2009)

A ceremonial ground (Site 43-1-4) for which a report could not be located has been recorded near the town of Condobolin on a hill behind the hospital. It is described as consisting of about 120 low heaps of stones about 2m in diameter and 3-40cm in height. Condobolin is approximately 200km to the north of the study area.

Burials have been uncovered approximately 200km to the north of the study area near Condobolin. Webb (1986) undertook the investigation of a sand dune approximately 400m south of the Lachlan River. His investigation which resulted from the exposure of human remains from sand mining revealed the presence of human skeletal remains in association with artefactual material. Analysis indicated that this burial site may possibly date from the early Holocene. The fourteen artefacts located in association with the burials included a ground edged hatchet made from a river pebble, quartzite flakes and chert flakes and a chert blade. This site became known as "Hall's Burial" (after the then property owner) and is numbered 43-1-6 (AHIMS).

Another burial site is recorded at Goobang. It is a fenced protected area accessed from the North Forbes Road and located on Goobang Creek known as the "Goobang Burial site". A report relating to this site could not be located in the open section of the AHIMS. However a report by R Wright dated 1997 and titled "Report on Human Skeletal Remains from Condobolin in New South Wales", and a report titled "Aboriginal burials on the riverine plain of NSW" by T Bonhomme (1987) may relate to this site. Both of these reports were held in the restricted section and the consultant did not access them. Site No. 43-1-7 (Hacketts Burials, Goobang Creek, Condobolin) registered on the AHIMS relate to these reports. The site recording form records 43-1-7 as a site containing at least two burials located 4km from Condobolin on the Old North Forbes Road.

A number of sites have been recorded in the vicinity of Griffith. An open campsite has been recorded at Narrandera which is only approximately 80km to the south east of Griffith. Approximately 10km to the north at Lake Wyangan and Tharbogang Swamp nine artefact scatters and six scarred trees have been recorded. To the east of Tharbogang Swamp another eight artefact scatters have been recorded. Four sites have been recorded at Yoogali which is approximately 6km north-east of Griffith. These consisted of two isolated finds and two artefact scatters which were subsequently collected as part of the State Significant Development of the Riverina Solar Project (RPS 2016a & b).

Within three kilometres of the study area the following sites have been recorded and are listed in Table 2 below and shown on 7:

AHIMS No. and Name	Site Type
49-2-0013: Griffith Scenic Hill Reserve	Open artefact scatter
49-2-0161: Scrubby 3	Scarred Tree
49-2-0162: Scrubs ft 1	Scarred Tree
49-2-0163: Mulga ft 8	Scarred Tree
49-2-0164: Mulga ft 6	Hearth
49-2-0157: Mulga ft 1	Hearth
49-2-0158: Mulga ft 5	Scarred Tree
49-2-0158: Mulga ft 4	Hearth
49-2-0160: Road Tank 2	Hearth

Table 2: AHIMS sites within 3km of the study area

Hearths, artefact scatters and scarred trees are the most common types of Aboriginal sites in proximity to the study area. The distribution of Aboriginal sites does not provide a detailed understanding of Aboriginal occupation within the region. Rather, it represents archaeological research and heritage assessment that have been undertaken. This lack of registered Aboriginal sites or places within the study area is due to the lack of assessments, rather than the lack of sites. It is possible that further unrecorded Aboriginal sites are present within and closer to the study area. However, despite the lack of assessments a number of Aboriginal sites have been recorded in the vicinity of the study area within a variety of environmental contexts. This indicates the possibility for evidence of subsurface Aboriginal objects to exist within the study area. The site cards for these sites provide minimal information. However, they all contained a very small number of artefacts.

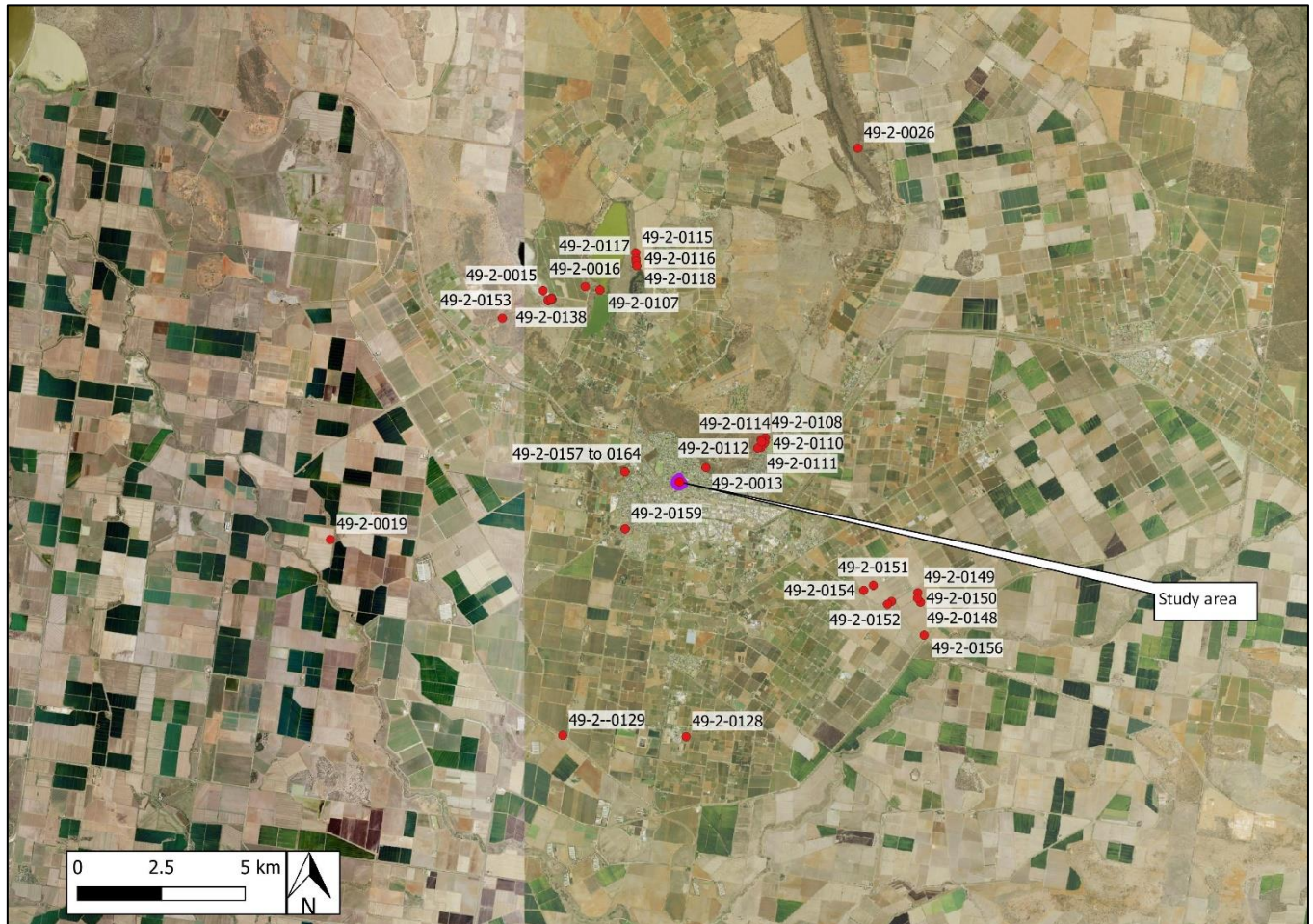


Figure 7: Location of AHIMS sites within the vicinity of the study area

7.2 The study area

A 2020 archaeological assessment determined that the study area contained archaeological potential although no surface artefacts were located (Comber 2020). The results of the excavations which are contained in this report confirm that Aboriginal objects extend across the hospital and the Aboriginal site has been registered on AHIMS (Griffith Base Hospital Site 01 49-2-0180).

8.0 ARCHAEOLOGICAL TESTING

8.1 Introduction

Archaeological testing was undertaken across the site from 5/5/2020 to 14/5/2020 in accordance with DPIE's *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* and the Research Design prepared by Jillian Comber dated 16 April 2020 Version A (attached as Appendix A). Notice was sent to DPIE on 16 April 2020 advising of the commencement of work.

Five potential archaeological deposits (PADs) had been identified in the assessment report (Comber 2020). Testing was undertaken within those five PADs across the Griffith Base Hospital. They were numbered PADs 1-5. The locations of the PADs are shown below at 8.

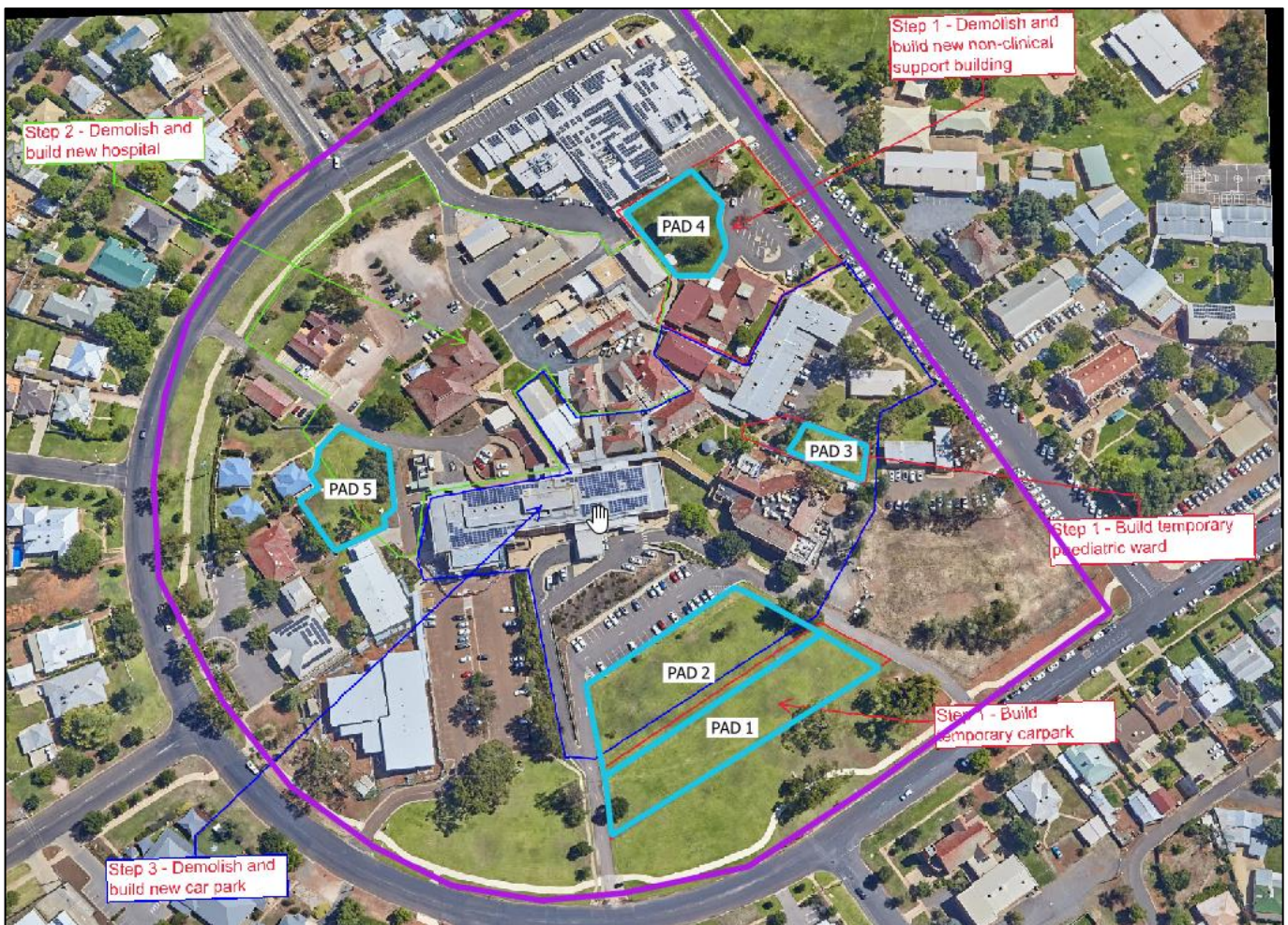


Figure 8: Showing location of PADs

8.2 Methodology

The test excavation was undertaken in accordance with the Code of Practice for Archaeological Investigations in NSW (DECCW 2010) and the research design attached at Appendix A. Where possible, test excavation units were placed approximately 10 m apart. Trenches were offset where necessary to avoid impacts to underground services. Test excavation units of 50cm x 50 cm were combined to form a 1m x 1m trench with the maximum continuous surface area of a combination of test trenches being 2m. As required by the Code less than 0.05% of each trench was excavated. The aim of the testing was to determine the nature and extent of the archaeological deposit within the PAD.



The trenches were excavated using hand tools in 5cm spits and then expanded to follow a feature or archaeological deposit and to determine the nature and extent of the buried deposits. Trenches were numbered sequentially within each PAD. Test excavation units were excavated to a culturally sterile layer. All test excavation units were backfilled at the conclusions of the test excavation.

A total of 19, 1m x 1m trenches, and 2, 0.5 m x 1 m trenches were excavated in 5 cm spits. In total, 21 trenches were excavated. Test excavations uncovered 271 artefacts in various levels of disturbance.

8.3 Results

PAD 1

PAD 1 is located to the south of the main hospital building, within a grassed area (Figure).

Soils across the PAD consisted of turfed topsoil of dark brown loamy sand, overlying increasingly firm, red loamy clay. Bioturbation including tree and grass roots and cicada burrows were noted throughout each trench. In particular, Trenches 1 and 2 had large tree roots at a depth of approximately 10 cm.

Within PAD 1, 50 artefacts were retrieved. Most artefacts came from Trench 1 and occurred in spit 2 and spit 3. Most artefacts measure between 14mm and 20mm in size.

Trench 3 was extended to the west and the extension was named Trench 4. This was due to two *insitu* artefacts being located within the north western corner of Trench 3.



Photograph 1: PAD 1, Trench 1 spit 3 showing tree roots



Photograph 2: PAD 1, Trench 2 northern section



Figure 9: Approximate location of Trenches 1-4, PAD 1



The results of the test excavation within PAD 1 are outlined in Table 3 below.

Trench No.	Spit No.	Depth (cm)	Soil	Artefacts
1	Turf removal	3	NA	0
	1	5	Dark brown sandy loam	0
	2	10	Dark brown sandy loam	34
	3	15	Reddish brown sandy loam	11 – one artefact found <i>in situ</i> in middle of trench
2	1	5	Brown loamy sand	0
	2	10	Dark brown loamy sand	0
	3	15	Reddish brown loam	1
	4	20	Reddish brown loamy sand	0
	5	25	Reddish brown loam soil	0
3	1	10	Dark brown loam	0
	2	15	Dark brown/red loam	2
	3	20	Dark brown/red loamy clay	1
	4	25	Reddish brown loamy clay	0
4	Turf removal	5	NA	0
	1	10	Dark brown loam	0
	2	15	Dark brown loam	0
	3	20	Dark brown loam	1
	4	25	Dark brown/red loam	0
Total no of artefacts = 50				

Table 3: Results of test excavation within PAD 1

PAD 2

PAD 2 is located to the south of the main hospital building, within a grassed area. PAD 2 is located directly north of PAD 1 (0).

The north western corner of PAD 2 contained a raised mound which was the remnant of a garden bed. Introduced red gravels occurred within the mound. These gravels had been introduced when the garden was constructed for drainage and decorative purposes (pers comm Ray Greig 2020). Artefacts were located within the gravels. Trenches were then excavated to determine the extent of the mound and artefact bearing deposits. According to Ray Greig, gardener, who has worked at the hospital for over 30 years, the gravels were introduced from the Warburn Quarry which is located very close to the Barren Box Swamp which is part of the Mirrool Creek System, which would have been a significant resource for Aboriginal people. The garden bed was removed when the carpark shown in Figure 3 was recently extended south. Twelve trenches were excavated within PAD 2. The trenches were located to determine the extent of artefact bearing deposits.

Gravels were identified in trenches 1, 4, 5, 6, 7, 8, 10, and 12. Within trenches that contained gravels, they were generally encountered within a discrete layer at approximately 10 cm.

Trench 1 was extended to the west by two trenches numbered 4 and 5 due to the artefactual bearing gravel layer being present. Trench 3 was discontinued due to the presence of a service. Trench 10 was discontinued due to modern rubbish and fill.

Soils across the PAD consisted generally of turfed topsoil of dark brown loamy sand, overlying increasingly firm, red loamy clay. A concentration of degraded shale was identified within the northern portion of Trench 2. Modern rubbish was encountered in multiple trenches across the PAD. Bioturbation including tree and grass roots and cicada burrows were noted.

Within PAD 2, 194 artefacts were retrieved. More than half the artefacts were retrieved from Trench 8, with others in Trench 6 and Trench 7, and smaller numbers in Trench 1, Trench 4 and Trench 5. Trench 8 is located at the southern end of the raised mound, indicating that the gravel and related artefactual material may have been subject to erosional processes. Nearly half the



artefacts came from spit 2 with others equally in spit 1 and spit 3. Similarly to PAD 1, artefacts retrieved from PAD 2 were between 14mm and 20 mm in size (White 2020).



Photograph 3: PAD 2, looking north with raised mound on left of photo



Photograph 4: PAD 2, Trench 2 northern section showing degraded shale



Photograph 5: PAD 2, Trench 8 end of excavation



Photograph 6: PAD 2, Trench 8 southern section showing gravel lens

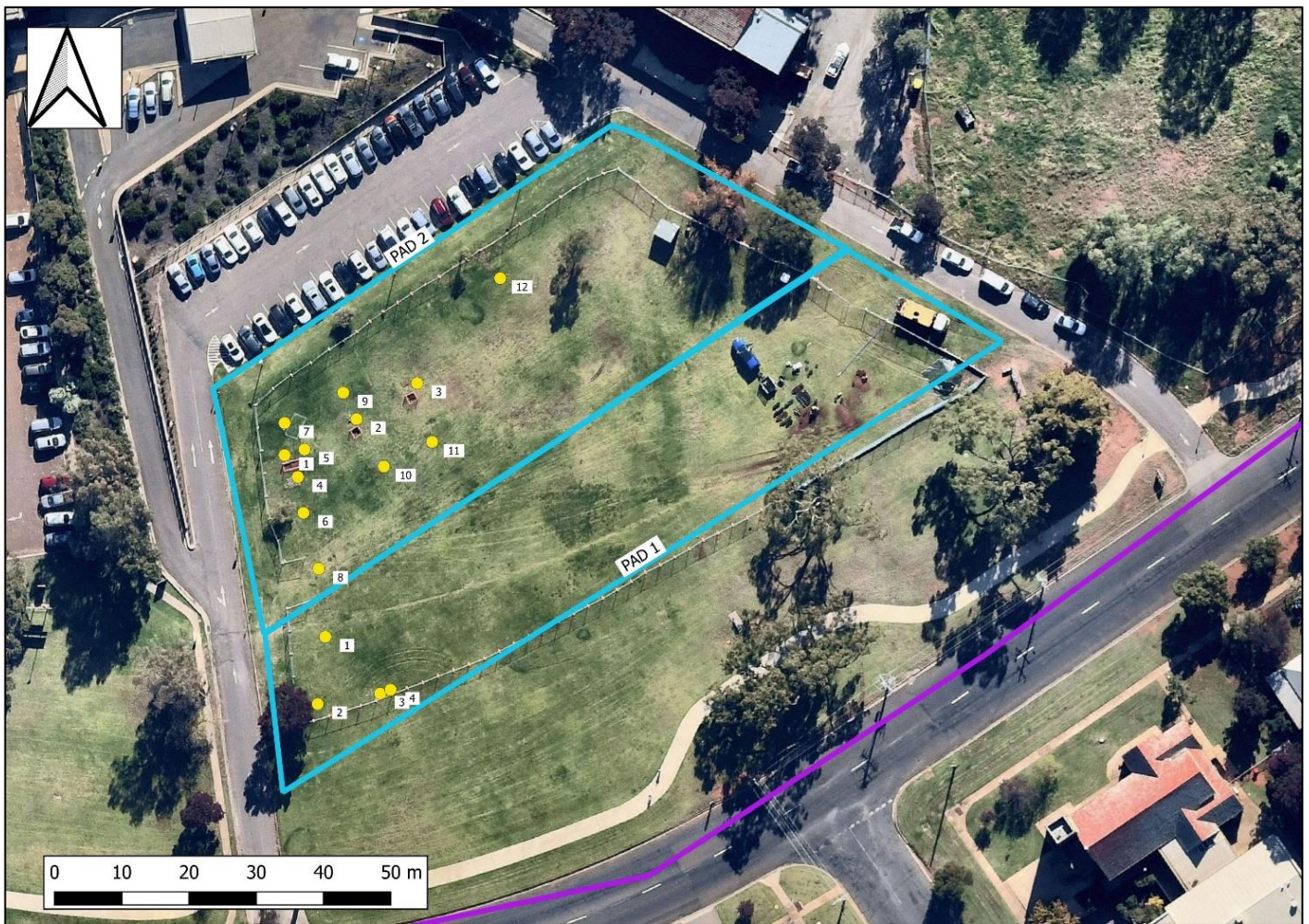


Figure 10: Approximate location of Trenches 1-12, PAD 2

The results of the test excavation within PAD 2 are outlined in Table 4 below.

Trench No.	Spit No.	Depth (cm)	Soil	Artefacts
1	Turf removal	3	NA	0
	1	5	Dark reddish brown clay loam with mixed gravels	5
	2	10	Dark reddish brown clay loam with increased gravels	0
	3	15	Dark reddish brown clay loam	0
	4	20	Dark reddish brown loamy clay	0
	5	25	Dark reddish brown loamy clay	0
	6	28-30	Dark reddish brown loamy clay onto clay	0
2	1	5	Turf removal	0
	2	10	Brown loam	0
	3	15	Brown loam	0
	4	20	Brown loam	0
	5	25	Brown loam	0
	6	30	Brown loam	0
	7	35	Brown loam	0
	8	40	Brown/red loam	0
	9	45	Reddish brown loamy sand	0
	10	50	Reddish brown loamy sand	0
3	Turf removal	3	NA	0



Trench No.	Spit No.	Depth (cm)	Soil	Artefacts
	1	5	Dark reddish brown loamy sand	0
	2	10	Dark reddish brown loamy sand	0
	3	15	Dark reddish brown loamy sand	0
	4	20	Reddish brown loamy sand clay	0
	5	25	Dark reddish brown sandy clay to clay	0
4	Turf removal	2	NA	0
	1	5	Dark reddish brown loamy sand with small ironstone nodules	8
	2	10	Dark reddish brown loamy sand with abundant gravels throughout top of spit	0
5	Turf removal	2	NA	0
	1	5	Brown loamy sand	1
	2	10	Brown loamy sand	8
6	Turf removal	3-4	NA	0
	1	5	Reddish brown sandy loam with abundant gravels	10
	2	10	Reddish brown sandy loam and gravels with abundant gravels at top of spit. No gravels at base of spit in NE, SE and NW corners. SW corner has concentration of gravels at base of spit.	11
	3	15	Dark reddish brown sandy loam	2
7	1	5	Brown loam	0
	2	10	Brown loam with dense concentration of gravels	18
	3	15	Brown loam with occasional gravels thinning out towards bottom of spit.	8
8	1	5	Brown loam with gravels at base of spit	11
	2	10	Brown loam with spit comprising approximately 80% gravels	58
	3	15	Reddish brown loam with gravels thinning out at approximately 12-13 cm	25
9	1	5	Reddish brown loamy sand	0
	2	10	Reddish brown loamy sand	0
	3	15	Reddish brown loamy sand	0
10	1	5	Mixed fill with some gravels	0
11	1	5	Reddish brown loamy sand	0
	2	10	Reddish brown loamy sand	0
	3	15	Dark reddish brown loam	0
	4	20	Reddish brown loamy	0
12	1	5	Reddish brown loamy sand	0
	2	10	Reddish brown loamy sand with gravels throughout spit mixed with modern rubbish	0
	3	15	Reddish brown loamy sand with concentration of gravels in NW corner	0
Gravel sample				29
Total no of artefacts = 194				

Table 4: Results of testing within PAD 2



PAD 3

PAD 3 is located east of the main hospital building, within a grassed area (Figure 1). Only one trench was excavated within the PAD due to the number of services in the area.

Due to a service located within the western half of the trench, the excavation of the western portion of the trench was ceased at approximately 13cm. The eastern portion of the trench was excavated to a depth of 35 cm.

Soils within the trench consisted of introduced topsoils of dark reddish-brown loamy sand overlying increasingly clayey and compact, red coloured natural loamy sand. The natural soil profile was encountered at a depth of approximately 12 cm. Bioturbation including tree and grass roots and cicada burrows were noted throughout the trench.

One artefact was identified within PAD 3, Trench 1, spit 3; a quartzite medial flake fragment.



Photograph 7: PAD 3, Trench 1 end of excavation



Photograph 8: PAD 3, Trench 1 southern section



Figure 11: Approximate location of Trench 1, PAD 3

The results of the test excavation within PAD 3 are outlined in Table 5 below.

Trench No.	Spit No.	Depth (cm)	Soil	Artefacts
1	1	5	Dark reddish brown loamy sand	0
	2	10	Dark reddish brown loamy sand	0
	3	15	Dark reddish brown loamy sand	1
	4	20	Dark reddish brown loamy sand	0
	5	25	Dark reddish brown loamy sand	0
	6	30	Dark reddish brown loamy sand	0
	7	35	Dark reddish brown loamy sand	0
Total no of artefacts = 1				

Table 5: Results of testing within PAD 3



PAD 4

PAD 4 is located to the north east of the hospital main building (Figure 2). Several large services were located within this area including a gas main, water pipes and electricity cables. As a result, it was only possible to site one trench within this area. Artefacts were located within this trench however, due to the number of services present, it was only possible to extend this trench by 50cm to the north and south, rather than a metre. Trench 1 was excavated as a 1m x 1 m, Trench 2 extended 50cm to the east and Trench 3 extended 50cm to the north. Trench 1 was excavated to a depth of 30cm, and Trenches 2 and 3 to a depth of 20 cm.

Soils within PAD 4 consisted of dark reddish-brown loam overlying dark reddish-brown loamy sand with small iron stone gravel throughout, as well as shale and charcoal flecks. The gravel identified in PAD 4 was of a different variety to that found in PAD 2. Bioturbation including tree and grass roots and cicada burrows were noted throughout the trench.

Artefacts were recovered from Trench 1, Trench 2, and Trench 3. The vertical distribution differs from those in PAD 1 and PAD 2 with most artefacts retrieved from Spits 3 and 4. The artefacts in PAD 4 occurred a little deeper than in PADs 1 and PAD 2. (White 2020:12)



Photograph 9: PAD 3, Trench 1, 2, 3 end of excavation



Photograph 10: PAD 3, Trench 2 eastern section



Figure 12: Approximate location of Trench 1, 2 and 3, PAD 4



The results of the test excavation within PAD 4 are outlined in Table 6 below.

Trench No.	Spit No.	Depth (cm)	Soil	Artefacts
1	Turf removal	3	NA	0
	1	5	Dark reddish brown loam	0
	2	10	Dark reddish brown loamy sand	0
	3	15	Dark reddish brown loamy sand	3
	4	20	Dark reddish brown loamy sand	2
	5	25	Dark reddish brown loamy sand	0
	6	30	Dark reddish brown loamy sand	0
2	Turf removal	3	NA	0
	1	5	Dark reddish brown loam	0
	2	10	Dark reddish brown loam	3
	3	15	Dark reddish brown loamy sand	5
	4	20	Dark reddish brown loamy sand	2
3	Turf removal	3	NA	0
	1	5	Dark reddish brown loamy sand	0
	2	10	Dark reddish brown loamy sand	0
	3	15	Dark reddish brown loamy sand	1
	4	20	Dark reddish brown loamy sand	9
Total no of artefacts = 25				

Table 6: Results of testing in PAD 4.

PAD 5

PAD 5 is located to the north west of the main hospital building, within a grassed area (Figure 3). Only one trench was excavated within this PAD due to the number of services within the area.

PAD 5, Trench 1 was excavated to a depth of 40cm. Soils consisted of firm and damp dark reddish-brown sandy loam with small ironstone nodules, overlying a sandy clay/loam at a depth of 15 cm, within which modern building materials such as nails and brick were noted. Spit 7 consisted of dark reddish brown clay loam. Bioturbation including tree and grass roots and cicada burrows were noted throughout the trench.

One artefact was retrieved from PAD 5, Trench 1 spit 6, consisting of a broken, stained quartzite flake.



Photograph 11: PAD 5, Trench 1 end of excavation



Photograph 12: PAD 5, Trench 1 northern section



Figure 13: Approximate location of Trench 1, PAD 5

The results of the test excavation within PAD 5 are outlined in Table 7 below.

Trench No.	Spit No.	Depth (cm)	Soil	Artefacts
1	Turf removal	3-4	NA	0
	1	5	Dark reddish brown sandy loam	0
	2	10	Dark reddish brown sandy loam	0
	3	15	Dark reddish brown sandy clay loam	0
	4	20	Dark reddish brown sandy clay loam	0
	5	25	Dark reddish brown clay loam	0
	6	30	Dark reddish brown clay loam	1
	7	35	Dark reddish brown clay loam	0
	8	40	Dark reddish brown clay loam	0
Total no of artefacts = 1				

Table 7: Results of testing in PAD 5.



8.4 Artefact Analyses

The artefact analysis was undertaken by Dr Beth White. The information below has been summarised from Dr White's analysis. Dr White's full report is included as Appendix B.

In order to create criteria to identify artefacts and differentiate between possible artefactual material and pebble gravels, Dr White inspected a sample of mechanically broken gravels and found the level of cortical pieces significantly higher than an average artefactual assemblage. Using this criteria, Dr White was able to differentiate between gravels and artefactual materials.

Most artefacts retrieved during test excavation were made by bipolar flaking. Bipolar artefacts greatly outnumber artefacts which appear to derive from freehand flaking (White 2020:13). The dominance of bipolar artefacts is consistent with the procurement and flaking of relatively small pebble-sized raw materials which occur naturally in the Griffith area (White 2020:13). Most artefacts are of quartz and quartzite with small number of chalcedony, silcrete, other fine-grained siliceous (FGS) and an unidentified type. The predominance of quartz and quartzite is consistent with geological descriptions of pebbles in the Griffith area. The raw materials are also generally consistent with previously recorded artefacts in the Griffith area (White 2020:16). Dr White notes that the artefacts from PAD 4 may have a different history of deposition to those artefacts located with the introduced gravels (White 2020:18).



PAD	Trench	Spit	Artefacts	Total in each Trench	Total in each PAD
PAD1	1	2	34	45	50
		3	11		
	2	3	1	1	
	3	2	2	3	
		3	1		
	4	3	1	1	
PAD 2	1	1	5	5	165
	4	1	8	8	
	5	1	1	9	
		2	8		
	6	1	10	23	
		2	11		
		3	2		
	7	2	18	26	
		3	8		
	8	1	11	94	
		2	58		
		3	25		
PAD 2	Gravel sample		29	29	29
PAD 3	9	3	1	1	1
PAD 4	1	3	3	5	25
		4	2		
	2	2	3	10	
		3	5		
		4	2		
	3	3	1	10	
		4	9		
PAD 5	1	6	1	1	1

Table 8: Number of identified artefacts in each PAD, trench and spit (White 2020:12)

Spit	PAD1	PAD2	PAD3	PAD4	PAD5	Total
1		35				35
2	36	95		3		134
3	14	35	1	9		59
4				13		13
6					1	1
gravel sample		29				29
Total	50	194	1	25	1	271

Table 9: Vertical distribution of artefacts in each PAD (White 2020: 12)



8.5 Summary

Five areas designated Potential Archaeological Deposits (PAD) 1-5 were excavated. The testing revealed a uniform soil profile of introduced topsoil to a depth of approximately 10-13cm overlying red/brown sandy loam. Artefacts were retrieved from an introduced gravel layer at the base of the topsoil within PAD 2. For PADs 1, 3, and 4, the highest density of artefacts was retrieved from spits 2, 3, and 4. These spits are at an approximate depth of between 6- 15 cm. As such, artefacts were retrieved from both introduced and natural soils. Artefacts consisted of quartz and quartzite, with small number of chalcedony, silcrete, other fine grained siliceous and an unidentified type. Quartz and quartzite pebbles are found within the Griffith area. Raw materials are also generally consistent with previously recorded artefacts in the Griffith area (White 2020: 16).

Test excavation recovered 271 artefacts from the five PADs located within Griffith Base Hospital. The highest artefact counts come from PAD 1 and PAD 2. Fewer artefacts were identified in PAD 4. One artefact was found in each PAD 3 and PAD 5. Gravels imported for landscaping purposes were located within PAD 2. Other broken pieces, which could potentially include some artefact fragments, occur in most trenches and spits which contain identified artefacts (White 2020: 12).

Generally, soils across the site were fairly homogenous and consisted of turf overlying brown loamy sand which is likely to have been topsoil dressing planted for the turf. This was overlying natural soil profiles which consisted of red/brown loamy clay soils. The levels of disturbance varied across the site; however, ground disturbance was noted within all PADs, relating to modern rubbish and fill, installation of services and the raised mound relating to the garden bed in PAD 2. Gravels relating to the garden bed were encountered within a discrete layer at approximately 10 cm in depth.

A large portion of the artefacts were retrieved from spits that exhibited high levels of imported gravel within PAD 2. Through discussions with staff at Griffith Base Hospital, it is understood that a garden bed was located within the north western portion of PAD 2, and extended northwards. The extension of the parking lot removed sections of the former garden bed. Therefore, the artefacts retrieved within the same stratigraphic context as the gravels are considered to have been redeposited during the construction of the garden bed and therefore not *insitu*. Dr White notes that the artefacts from PAD 4 may have a different history of deposition to those artefacts located with the gravels. It is possible that the artefacts in PAD4 are the remnants of an *insitu* site that was disturbed during construction of the hospital (White 2020: 18).

A summary of the locations in which the gravels were found is outlined in Table 10 below.

Trench	Spit	Depth (cm)	Comments
1	1	5	Mixed garden gravels throughout spit
	2	10	Increased gravels
	3	15	No gravel for remainder of spits in Trench 1
2			No gravels Trench 2
3			No gravels Trench 3
4	1	5	Small ironstone nodules throughout spit
	2	10	Gravels in abundance throughout majority of spit, overlying loamy sands without gravels at base of spit. Excavation ceased.
5	1	5	No gravels
	2	10	Gravels in abundance – 3 cm thick. Came onto loamy sand at base of spit. Excavations ceased.
6	1	5	Gravels shallower than in previous spits. Gravels in abundance in this spit.
	2	10	Gravels in abundance. NE, SE, and NW corner no gravel at base of spit. SW corner concentration of gravels at base of spit.
	3	15	No more gravels. Excavations ceased.
7	1	5	No gravels
	2	10	Dense concentration of gravels
	3	15	Occasional gravels thinning out towards bottom of spit. Excavations ceased.



8	1	5	Gravels at base of spit
	2	10	Spit comprises approximately 80% gravels
	3	15	Gravels thinned out at approximately 12-13 cm
9			No gravels Trench 9
10	1	5	Some gravels mixed with fill, asphalt, plastic. Excavations ceased due to possible service.
11			No gravels Trench 11
12	1	5	No gravels
	2	10	Gravels throughout spit, mixed with modern rubbish
	3	15	Concentration of mixed gravels in NW corner Excavations ceased

Table 10: Location of gravels within PAD 2

The information retrieved from the test excavation is considered important in the understanding of the extent and nature of Aboriginal artefacts within Griffith Base Hospital and the region more widely, as archaeological excavation and research within the area is limited. They are also very important to the Aboriginal community.

The site has been registered as GBH01 on the Aboriginal Heritage Information System and is numbered AHIMS 49-2-0180.



9.0 SIGNIFICANCE ASSESSMENT

9.1 Preamble

Significance assessment is the process whereby sites or landscapes are assessed to determine their value or importance to the community.

A range of criteria have been developed for assessing the significance which embody the values contained in the Burra Charter. The Burra Charter provides principles and guidelines for the conservation and management of cultural heritage places within Australia.

Following are the criteria which will be used to assess the significance of the Griffith Base Hospital study area.

9.2 Criteria

Social Value (sometimes termed 'Aboriginal' value) which refers to the spiritual, traditional, historical or contemporary associations or attachments which the place or area has for the present-day Aboriginal community.

Historic Value refers to the associations of a place with a person, event, phase or activity of importance to the history of an Aboriginal community.

Scientific Value refers to the importance of a landscape, area, place or object because of its potential to provide information which is of value in scientific analysis and the ability to answer scientific or technical research questions.

Aesthetic Value refers to the sensory, scenic and creative aspects of the place.

Representativeness refers to whether the site demonstrates the principal characteristics of that site and is a good representative example of that site type.

Rarity refers to the degree to which such as site is known elsewhere and whether the site is uncommon, rare or endangered.

9.3 Assessment

Social Value

Consultation with representatives of the Aboriginal community indicates that the study area is important to the local and broader Aboriginal community. The artefacts retrieved during test excavation provide evidence of Aboriginal occupation representing their past, providing a direct link to their ancestors, and a continued connection to country and culture. The artefacts represent one of few tangible social links available in the increasingly developed Griffith landscape, and contain high social value for the Aboriginal community.

Historic Value

The study area exhibits historic values as part of the history of Aboriginal people from before European occupation through to contact and dispossession. Retrieval of Aboriginal artefacts during test excavation confirms the presence of Aboriginal occupation and resource use within the region.

Scientific Value

The majority of artefacts retrieved have been deposited with local gravels used as aggregate and are therefore not in their original context. The artefacts from PAD 4 appear to be an *insitu* deposit of a remnant site. Given the absence of archaeological investigation within the Griffith region, any archaeological excavation would contribute to the scientific understanding of Aboriginal occupation of the area. As such, the study area has the potential to yield further information through detailed scientific and archaeological research into the nature of Aboriginal occupation and techniques utilised in subsistence activities. In particular, the assemblage contains many bipolar artefacts that have scientific value.

**Aesthetic Values**

The study area has been modified since settlement so no longer contains aesthetic values related to Aboriginal use and occupation. The Aboriginal objects themselves have aesthetic value as examples of a stone tool assemblage from the area, as well as toolmaking techniques, in particular bipolar artefact manufacture, within the Griffith region.

Representative Values

The majority of artefacts were recovered from disturbed terrain and do not provide a good representative example of an Aboriginal site or cultural landscape. However, the Aboriginal objects are representative of bipolar tool making techniques.

Rarity Values

The archaeological assemblage retrieved from Griffith Base Hospital is rare due to the paucity of archaeological investigations undertaken within Griffith and the wider region.

9.3 Statement of Significance

Consultation with representatives of the Aboriginal community indicates that the study area is important to the local and broader Aboriginal community. The artefacts retrieved from the Griffith Base Hospital provide evidence of Aboriginal occupation within the Griffith region, representing their past, providing a direct link to their ancestors, and a continued connection to country and culture. The artefact assemblage contains value as an example of stone tool making, in particular using the bipolar technique. The study area has the potential to yield further information through detailed scientific and archaeological research into the nature of Aboriginal occupation and techniques utilised in subsistence activities. This is particularly significant due to the paucity of Aboriginal archaeological investigations undertaken within Griffith and the wider region generally.



10.0 SUMMARY AND RECOMMENDATIONS

10.1 Summary

The Griffith Base Hospital is being redeveloped. The need for the redevelopment is to improve efficiencies across the hospital, improve infrastructure and address the changing models of healthcare to meet future growth and demand.

The proposed development will involve extensive impact to the study area. The proposed works will involve extensive ground disturbance including, but not limited to:

- Demolition and clearing
- Cut and fill
- Construction of buildings
- Construction of service infrastructure

To ensure the best practice management of the Aboriginal archaeological and cultural heritage, Health Infrastructure NSW commissioned Comber Consultants to undertake an Aboriginal archaeological assessment and archaeological test excavations across the site in consultation with the Aboriginal community. The aim of the testing was to confirm the presence of Aboriginal objects and their nature and extent. The results of the testing will assist in informing future management strategies.

The testing uncovered Aboriginal objects across the Griffith Base Hospital site with higher density of artefacts located within the southern portion of the hospital grounds in PADs 1 and 2. The hospital has been registered on the Aboriginal Heritage Information System as AHIMS 49-2-0180.

It appears that some of the Aboriginal objects were transported to the site within gravels that were used for landscaping purposes. However, of significance are the Aboriginal objects recovered from *insitu* subsurface deposits. This demonstrates Aboriginal occupation of multiple locations within the Griffith region. That is, the location of the gravels in addition to the hospital site itself. The *insitu* deposits recorded within PADs 1 and 3-5 indicate that the site was occupied by Aboriginal people prior to European settlement. Additionally, the lithic deposits within the gravels in PAD 2 provides an example of the type of artefacts to be found within the Griffith region. This is particularly important because of the paucity of archaeological investigations undertaken within the region. These artefacts contribute to an understanding of Aboriginal occupation of the region and the nature of Aboriginal tool making.

In addition, these artefacts are very important to the Aboriginal community as evidence of their occupation providing links to their ancestors. The GLALC have indicated that they would like the remainder of the artefacts retrieved from PADs 1 and 2. They would like to obtain the artefacts for display and educational purposes.

This program of test excavation only uncovered a portion of the artefacts on the site. As it is an offence to harm Aboriginal objects it will be necessary to apply for an Aboriginal Heritage Impact Permit with salvage to allow removal of the artefacts from PAD 1 and 2 prior to the redevelopment of the site. Due to the services within PADs 3-5 no further excavation is recommended within these areas. The maximum amount of excavation that could be undertaken safely with PADs 3-5 was undertaken and the maximum amount of artefacts retrieved.

It is important that interpretation of these artefacts and the Aboriginal history of the region be undertaken. An interpretation strategy and plan should be developed to provide an exciting and innovative interpretation program at the hospital. It is important that this significant Aboriginal history is recorded and interpreted to the public. This should be undertaken in partnership with the GLALC

10.2 Recommendations

The following recommendations are made on the basis of:

- Legal requirements under the terms of the *National Parks & Wildlife Act 1974* (as amended) which states that it is an offence to harm or desecrate an Aboriginal object without first gaining the consent of the Director-General of the Department of Planning, Industry & Environment.



- The research into the archaeology of the region and the Griffith Base Hospital site contained in this report.
- The archaeological test excavations and the analyses and results of those excavations contained in this report.

IT IS THEREFORE RECOMMENDED THAT:

1. An application for an Aboriginal Heritage Impact Permit for harm, with salvage of PADs 1 and 2 should be submitted to Heritage NSW.
2. Once the permit has been received, Aboriginal archaeological salvage of PADs 1 and 2 should be undertaken. Once that has been completed the redevelopment can proceed.
3. Salvage is not required for PADs 2-5.
4. The final repository for the artefacts should be with the Griffith Local Aboriginal Land Council.
5. Consultation with the Griffith Local Aboriginal Land Council should continue.
6. An interpretation strategy and plan should be developed which interprets the results of the archaeology and the Aboriginal history of the region. This should be in partnership with the Griffith Local Aboriginal Land Council.



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GLOSSARY

Adze: an axe like bifacial tool with a bevelled bit or blade edge usually used to work wood, or sometimes to dig for root crops.

Alluvium: material which is transported by a river and deposited at points along the flood plain of the river.

Artefact: any object made by human agency. All lithic tools and lithic debitage are considered artefacts.

Artefact scatter: also known as a surface scatter or open site, where prehistoric material such as artefacts and waste debris are lying exposed on the surface of the ground.

Assemblage: a collection of artefacts from an archaeological site.

Australian small tool tradition: a mid Holocene tool industry of the Australian Aborigines that appeared about 5,000 years ago when a new ensemble of small, flaked stone tools began to come into use. The types consisted of backed blades and flakes, Unifacial and bifacial points, and small adze flakes. There are some regional distributions of tools, including Bondi points, geometric microliths, Pirri points and Tula adzes.

Axe: a stone artefact that has been ground on one or more sides to produce a sharp edge.

Backed blade: a blade flake that has been abruptly retouched along one or more margins opposite an acute (sharp) edge. Backed pieces include backed blades and geometric microliths. They are thought to have been hafted onto wooden handles to produce composite cutting tools or spears. Backed blades are a feature of the “Australian small tool tradition”, dating from between 5,000 and 1,000 years ago in south eastern Australia (Mulvaney 1975).

Bifacial flaking or retouch: when flakes have been removed from two opposing faces.

Bipolar flaking technique: the core is placed on a stone or anvil support, and then struck with a large heavy hammerstone.

Biomantle: the upper part of soil produced by biodynamical agents and processes of which bioturbation is normally hierarchically dominant. By definition, it contains at least 50% biofabric, a condition met in essentially all topsoils.

Bioturbation: the alteration of a site by non-human agency, eg. burrowing animals, tree and grass roots, insects

Blade: a flake that is at least twice as long as it is wide.

Bondi point: a small, asymmetric backed point, named after Bondi Beach where it was first found, which is a component of the Australian small tool tradition. It is usually less than 5cm long and is sometimes described as a backed blade.

Broad platform flake: a flake which has a platform which is as wide as, or wider than, the body of the flake.

Bulb of percussion: a rounded bulge where the force from the hammerstone has radiated through the stone and split it from the core.

Burin: a flake tool that was produced by the removal of two flakes at right angles to one another to produce a very fine sharp and durable edge.

Carved trees: trees which have had designs carved into the bark or heartwood and in some areas may have been used to mark burial or initiation sites.

Chert: a very fine crystalline aggregate of silica.

Context: the time and space setting of an artefact, feature or culture. The context of a find is its position on a site, its relationship through association with other artefacts, and its chronological position as revealed through stratigraphy. An artefact's context usually



consists of its immediate matrix (the material surrounding it, eg. clay, gravel or sand), its provenience (horizontal and vertical position within the matrix), and its association with other artefacts (occurrence together with other archaeological remains, usually in the same matrix). The assessment of context includes study of what has happened to the find since it was deposited.

Core: a piece of stone bearing one or more negative (concave) flake scars. A stone which has obviously had flakes and flaked pieces struck from it.

Cortex: refers to the original weathered outer surface of the rock used to manufacture an artefact.

Debitage (debris): detached pieces that are discarded during the reduction process.

Distal end: the end opposite to the platform or the point end of a blade.

Dorsal surface: the 'back' of the artefact or the side that was once part of the outside of the core or shows evidence of previous flake removals.

Edge-ground artefact: an artefact (generally an axe or adze) whose cutting edges have been ground, rather than flaked, to form a sharp edge.

Eraillure scar: the small flake scar on the dorsal side of a flake next to the platform. It is the result of rebounding force during percussion flaking.

Erosion: the wearing away or loosening and transportation of soil or rock by water, wind and ice.

Fabricator: a stone or bone artefact used in the manufacture of other tools. Often rod shaped and worn heavily on one end, it is used to chip flakes from a core, or to retouch a flake.

Flake: any piece of stone removed from a larger mass (core) by application of force (percussion), and having a striking platform and bulb of percussion.

Flaked piece: any stone struck from a larger mass by percussion but not containing all or any of the characteristics of a flake.

Focal platform flake: a flake which has a platform narrower than the body of the flake.

Grinding groove: a depression resulting from the sharpening of stone tools such as axes and adzes, usually located on surfaces of fine homogenous sandstone and near water.

Grinding stone: a thick stone used as a mortar for grinding seeds, roots, tubers, or ochre.

Hammerstone: the stone that is used to remove flakes from the core.

Holocene: that portion of geologic time that postdates the latest episode of continental glaciation. The Holocene Epoch is synonymous with the recent or postglacial interval of Earth's geologic history and extends from 10,000 years ago to the present day. It was preceded by the Pleistocene Epoch and is part of the Quaternary Period, a time characterised by dramatic climatic oscillations from warm (interglacial) to cold (glacial) conditions that began about 1.6 million years ago. The term Holocene is also applied to the sediments, processes, events, and environments of the epoch.

Horizon (or soil horizon): the layers of the upper crust of the earth. The top, or O, horizon is the layer of undecomposed litter; the A horizon is topsoil, where most roots grow; B is the subsoil; and C is the parent rock material, broken into chunks. Although some roots can penetrate into the C horizon, few microorganisms live there.

Isolated find: a single stone artefact found on the surface of the land not in association with any other artefact.

Knapping: the process of hitting one stone (core) with another (hammerstone) to produce a flaked artefact.



Lamellate flaked piece: thin and wedge shaped, similar to a flake, but without the diagnostic features of a flake. A lamellate may be the distal end of a flake which has had its platform broken off.

Lithic: anything made of stone. Derived from the Greek word meaning stone or anything pertaining to stone.

Manuport: piece of stone intended to be, or used as, a core that has been carried to the area from somewhere else.

Microlith: a small (1 – 3cm long) flake with evidence of retouch. Bondi points, scrapers and backed blades are all types of microliths.

Midden: a prehistoric refuse site chiefly composed of shell fragments.

Multidirectional core: a lithic mass (core) with evidence of flaking originating from more than one direction and with more than a single striking platform.

Negative flake scar: the scar left by the removal of a flake. The scar may also show a rounded depression which is the negative of the bulb of percussion.

Open site: also known as a surface or artefact scatter, where prehistoric material such as artefacts and waste debris are lying exposed on the surface of the ground.

Pirri point: a symmetrical leaf-shaped point, up to 7cm long, unifacially flaked all over its dorsal surface. The striking platform and bulb of percussion are sometimes removed to produce a rounded, thinned butt. Pirri points are a component of the Australian small tool tradition, found generally in inland Australia. The term pirri is an Aboriginal word for 'wood engraving tool'.

Platform: the flat surface which receives percussion or pressure in the removal of a flake or flaked piece.

Pleistocene: a geochronological division of geological time, an epoch of the Quaternary period following the Pliocene. During the Pleistocene, large areas of the northern hemisphere were covered with ice and there were successive glacial advances and retreats. The lower Pleistocene began about 1.8 million years ago; the Middle Pleistocene about 730,000 years ago; and the Upper Pleistocene about 127,000 years ago; it ended about 10,000 years ago. The Pleistocene was succeeded by the Holocene.

Potential archaeological deposit (PAD): any location considered to have a moderate to high potential for subsurface archaeological material

Potlid: small circular piece of stone that has literally "popped off" the surface of the artefact due to exposure to extreme heat.

Proximal end: the 'top' of the artefact, or the part that the knapper hit to remove it from the core, where the platform is expected to be.

Quarry: a location from which stone has been extracted in order to make stone artefacts.

Retouch: refers to the secondary working of an artefact after it has been struck from the core. Retouch is used to sharpen the edges. It is the intentional modification of a stone tool edge by either pressure or percussion flaking techniques.

Scarred trees: trees from which bark has been removed for the manufacture of everyday items such as containers, canoes or shields.

Scraper: a generalised term used to describe a flake tool that has a retouched edge angle of approximately 60 to 90 degrees.

Silcrete: silica-rich duricrust identified by the presence of complete granules or even pebbles within the matrix.

Stratigraphy: the study and interpretation of the stratification of rocks, sediments, soils, or cultural debris, based on the principle that the lowest layer is the oldest and the uppermost layer is the youngest. The sequence of deposition can be assessed by a study of the relationships of different layers.



Taphonomy: Literally, 'the laws of burial'. In archaeology, it is the study of the processes by which archaeological remains are transformed by human and natural processes during their incorporation into archaeological deposits, their subsequent long-term preservation within those deposits, and their recovery by archaeologists. The aim is to understand the processes resulting in the archaeological record.

Thumbnail scraper: a small flake with a convex scraper edge, shaped like a thumbnail and located opposite the flake's platform. They exhibit unifacial retouch (usually on the ventral surface) and are usually less than 30mm in length.

Transect: an arbitrary sample unit which is a linear corridor of uniform specified width. A straight line or narrow sections through an archaeological site, along which a series of observations or measurements is made.

Tuff: a rock formed of volcanic fragments (generally ash).

Typology: a scheme to order multiple types in a relational manner. A common typology orders types in a hierarchical manner.

Unidirectional core: a core with only one striking platform surface and with flake scars extending in only one direction.

Unifacial flaking or retouch: where flakes have been removed from one face only.

Use-wear: the physical changes to the edges of an artefact as a result of its use. Modification of a tool resulting from its use.

Ventral surface: the 'front' of the artefact, or the side that was once part of the interior of the core.



APPENDIX A: RESEARCH DESIGN



APPENDIX B: LITHIC ANALYSES



APPENDIX C: LETTER FROM GRIFFITH LOCAL ABORIGINAL LAND COUNCIL



Griffith Local Aboriginal Land Council

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22nd July 2020

Jillian Combe

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RE: GLALC Aboriginal Cultural Heritage Survey's – Griffith Base Hospital Re-development – Combe Consultants ACHAR.

Dear Jillian,

We would like to thank you for contacting the Griffith Local Aboriginal Land Council, in seeking consultative engagement with our Aboriginal Cultural Heritage Officers for undertaking numerous ACH surveys across Griffith Base Hospital Re-Development Area.

As per the required Code of Practice for Aboriginal Archeological Investigation of Aboriginal Objects in NSW (DECCW 2010b). And the guide to investigating, assessing and reporting on Aboriginal Cultural Heritage in NSW (OEH,2011).

I can verify that our Aboriginal Cultural Heritage Officers on the behalf of the GLALC has reviewed the AHIMS data base, with capturing a view of current recorded registrations of significant Aboriginal places within the vicinity of the Griffith Base Hospital. In reference of Aboriginal Ancestral Objects and materials found at GBH may require further deep earth explorations in identifying and protecting Aboriginal Wiradjuri Heritage.

I can confirm that with ancient Aboriginal objects identified within ACH survey investigations, I can confirm the GLALC will recommend that an application for an Aboriginal Heritage Impact Permit is lodged. In where the GLALC we will seek to provide further comment with ensuring our Aboriginal Ancestral materials & objects are safely removed away from the development area and further returned to Griffith Local Aboriginal Land Council. The GLALC will also further seek to have NSW Health/Infrastructure including GBH re-development acknowledge and further accept that our Wiradjuri Ancestral place and its histories must be incorporated within the development of Griffith's new Hospital.

The Griffith Local Aboriginal Land Council, does requires payment as per the agreed \$125p/h excluding GST. In total accumulation 48 hours of work undertaken by GLALC is to be paid within 2 working days as per the attached INV-00181.

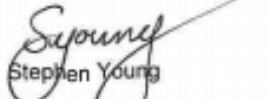
If you require any further clarification/information please don't hesitate to contact the GLALC.



"Always was, always will be Aboriginal Land"



Regards


Stephen Young
Chief Executive Officer