

Aboriginal Cultural Heritage Assessment

Blakebrook Public School

Prepared for School Infrastructure NSW

October 2023

Aboriginal Cultural Heritage Assessment

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School Infrastructure NSW

E230642a RP1

October 2023

Version	Date	Prepared by	Reviewed by	Comments
V1	15 September 2023	Mikhaila Chaplin Rohani Dutch	Alan Williams	Draft
V2	25 September 2023	Stacey Kennedy	Alan Williams	Final draft
V3	18 October 2023	Stacey Kennedy	Alan Williams	Final

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Executive summary

School Infrastructure NSW (SINSW) (the proponent) is proposing to repair and replace flood damaged buildings at six schools in the Northern Rivers Region that were critically impacted by floods in February and March 2022 as part of the Northern Rivers Recovery Project. Blakebrook Public School (project area) forms part of the flood recovery program. SINSW on behalf of the Department of Education (DoE) proposes to demolish the current school buildings and replace them, after they have been deemed unrepairable following an assessment of flood damage.

EMM Consulting Pty Limited (EMM) has been engaged by ADCO on behalf of SINSW to prepare an Aboriginal Cultural Heritage Assessment (ACHA) for Blakebrook Public School to provide information on the location, distribution, and significance of Aboriginal objects within the project area, identify the likely harm to objects by proposed development, and provide recommendations for the management of such harm.

The assessment adopted the processes and methods outlined in Heritage NSW's *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* guidelines. After communications with NTSCorp, they confirmed that the Widjabul Wia-bal Gurrmbil Aboriginal Corporation is the Registered Native Title Body Corporate (RNBTC), established by Widjabul Wia-bal to hold native title rights and interests and to progress Widjabul Wia-bal's interests. In accordance with the guidelines, no further notification or inclusion of other participants is required once a native title claimant has been identified, and all consultation was undertaken with the Widjabul Wia-bal Gurrmbil Aboriginal Corporation for the remainder of the project. NTSCorp provided four individuals who expressed an interest to be involved.

The assessment undertook archaeological field survey and test excavations to explore and document any Aboriginal objects, sites and places within the project area, and to align them within the regional context. Overall, the findings were found to conform with the regional models of isolated or low-density artefact scatters, reflecting transitory use of the landscape in proximity to water sources. These findings resulted in one site, NRBL IF1 (AHIMS #04-4-0321), an isolated find situated in the north-west corner of the project area to be located at 55 cm depth within a natural soil profile of the Leicester soil landscape.

The proposed impacts would result in direct impacts to NRBL IF1 (AHIMS #04-4-0321), resulting in its total loss. The deposits within which the isolated object was found extend intermittently across the site. As such, additional (albeit very low) densities of cultural materials may occur within the project area. However, isolated stone artefacts are found widely across NSW and, as such, the loss of a small portion here would have negligible intergenerational or cumulative impacts.

The following recommendations should be integrated into the management for the project (see Section 10.3 for further discussion):

1. No ground disturbance activities are permitted within 10 m of identified Aboriginal site, NRBL IF1 (AHIMS #04-4-0321) without having obtained an Aboriginal Heritage Impact Permit (AHIP) from Heritage NSW. The AHIP should seek to encompass the entirety of the proposed development activity within the project area (Figure 10.1). Given the paucity of cultural materials encountered within the site, and presence of surface and upper soil profile disturbance, no further archaeological mitigation is proposed for inclusion in the AHIP.
2. The Construction Environment Management Plan (CEMP), or equivalent, should reinforce how the cultural landscape is considered throughout the project and detail the rehabilitation of the project area. In discussion with the Aboriginal community, rehabilitation of areas where infrastructure is not remaining after the project should be undertaken to determine suitable ecological communities and other factors in returning the cultural landscape as close to its current state as feasible.

3. To avoid inadvertent impact, the proponent should implement cultural awareness training for all relevant personnel and contractors involved in the project of the relevant heritage considerations, legislative requirements, and recommendations identified in this assessment. This should be conducted on Country by a member of the Widjabul Wia-bal Gurrmbil Aboriginal Corporation as part of the site induction process.
4. Consultation should be maintained with the Widjabul Wia-bal Gurrmbil Aboriginal Corporation throughout the life of the project and subsequent ground disturbance stages of the project.
5. A copy of the ACHA should be lodged with AHIMS and provided to the RAP.
6. AHIMS Site Recording Forms for the newly identified Aboriginal site within the project area should be submitted to the AHIMS database once their validation has been completed.
7. If any part of the construction footprint is located outside the areas identified in this ACHA, or if any alteration is proposed, further assessment of these area(s) should be undertaken to identify and appropriately manage Aboriginal objects and/or sites that may be present.
8. Where the heritage consultant changes through the project, suitable hand over should be undertaken to ensure no loss or mistranslation of the intent of the information, findings and future steps in heritage management occur.

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1 Introduction

1.1 Background and purpose of report

SINSW (the proponent) is proposing to repair and replace flood damaged buildings at six schools in the Northern Rivers Region that were critically impacted by floods in February and March 2022 as part of the Northern Rivers Recovery Project. Blakebrook Public School (project area) forms part of the flood recovery program.

A masterplan has been created to relocate and replace flood damaged buildings within contemporary new learning and administration spaces. Other key objectives are to improve overall site planning and relationships, to retain the existing community and heritage value of the school, and to ensure provision of future protection against flood risk. The master planning will rebuild to the same number and type of spaces previously provided for each school. These activities would require substantive earthworks, including excavation, levelling, remediation and landscaping across the project area.

As part of initial planning for the project, EMM undertook a desktop Aboriginal heritage due diligence assessment of the project area in 2022. The assessment concluded that the project area has potential for Aboriginal objects to occur in either a disturbed or intact state due to the prevalence of sites in the surrounding region and the cultural and archaeological sensitivity of tributaries of Wilsons River tributaries in this vicinity. Although past historical disturbance to the soils has occurred, there is potential for in situ Aboriginal objects to remain within the project area. Therefore, it was determined that the proposed activity may result in harm to Aboriginal objects and further Aboriginal heritage assessment comprising an ACHA was required.

ADCO Constructions, on behalf of SINSW, has commissioned EMM to undertake an ACHA to identify the presence of any Aboriginal heritage values and to avoid, minimise, mitigate and/or manage impacts to Aboriginal heritage resulting from the project. The ACHA will support assessment under Part 4 of the *Environmental Planning and Assessment Act 1979*.

The objectives of the investigation were as follows:

- Liaise and consult with key Aboriginal community members and knowledge holders to identify areas and places of cultural value within or in the vicinity of the project area.
- Compile a review of existing environmental, historical and archaeological information for the project area, by identifying and summarising known and previously recorded Aboriginal heritage places, cultural values areas and landforms of archaeological interest in its immediate surrounds.
- Determine if any Aboriginal objects, places, cultural values areas, or areas of archaeological potential are present (or are likely to be present) within the project area, as well as areas of existing disturbance, through ground-truthing.
- Identify the type, nature, and extent of any Aboriginal sites, objects, archaeological deposits, potential archaeological deposits, and cultural values areas within the project area.
- Map the locations of known and potential Aboriginal sites, objects and deposits and cultural values areas identified.
- Assess the archaeological and cultural significance of the project area.
- Assess and identify heritage constraints and opportunities and the potential impacts of the project.
- Identify and recommend measures to mitigate any heritage impacts and risks to the project.

The project is being assessed as part of a Development Application under Part 4 of the *NSW Environmental Planning and Assessment Act 1979*. As a result, this report has been developed in accordance with the following relevant guidelines:

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011)
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010)
- *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010).

1.2 Project area

The project area is located in north-east NSW at 417 Rosehill Road, Blakebrook, NSW (Lot 2 DP859866), situated 6 km north-west of the Lismore (Lismore LGA) (Figure 1.1). Currently, the project area is used as Blakebrook Public School with a total area of ~1.2 ha and with a 450 m perimeter (Figure 1.2).

The site currently includes several school related buildings and ancillary structures across the centre of the site adjacent to the north and south boundaries, with open grassed areas along the east and west of the project area (Plate 1.1). Surrounding the site includes modified pastoral lands and Rosehill Road adjacent to the southern boundary.

1.2.1 Proposed development

The existing buildings at Blakebrook Public School, 417 Rosehill Road, Blakebrook (Lot 2 Deposited Plan (DP) 859866) were significantly inundated during the February/March 2022 floods and most of the structures are no longer habitable due to the damages caused by the flood waters. As a result, the NSW Department of Education is proposing to demolish most of the existing school buildings and construct a new elevated school building to replace it. The floor level of the new building will be located above the design flood level to increase flood resistance and create useable undercroft spaces.

The works are being undertaken as a Development Application (DA) to Lismore City Council (Council).

The proposed development is to be undertaken in two stages as follows:

- Stage 1: demolition of the existing buildings and tree removal (separate Early Works DA)
- Stage 2: construction of a new elevated school building and landscaping and ancillary works and structures (this Main works DA).

The Main Works development comprises:

- construction of a new elevated school building, with at-grade (undercroft) amenities
- storage, including:
 - ground level:
 - open undercroft space for covered outdoor learning and play
 - male and female amenities and accessible toilet/change room facility
 - cleaners' store
 - equipment store
 - sport equipment store

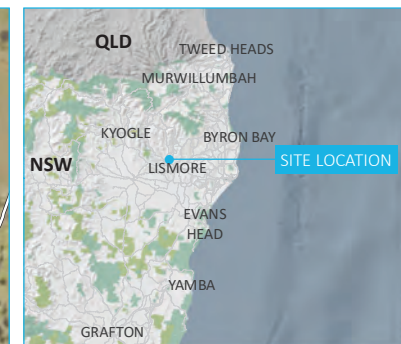
- elevated level:
 - new administration comprising interview room, clerical spaces, principal's office, staff room, sick bay and male, female and accessible amenities
 - school library with computer room, store, main communications room and library office
 - four General Learning Spaces (GLS) with learning commons and multi-purpose space
 - canteen with open servery space
 - store
 - male, female and accessible amenities
 - mechanical plant
- new and hard soft landscaping including replacement play equipment, vegetable garden, fernery and yarning circle
- new hydrant pump house with fire tanks
- relocation and replacement of existing septic tanks and water tanks.

It is not proposed to increase staff or student numbers as a result of these works.

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Source: EMM (2023); ABS (2021); DFSI (2017, 2020); Metromap (2023); GA (2011)

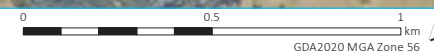


- KEY**
- Site boundary
 - Existing environment
 - Major road
 - Minor road
 - Vehicular track
 - Named watercourse
 - Named waterbody

- INSET KEY**
- Major road
 - NPWS reserve
 - State forest

Regional setting

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 1.1



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KEY

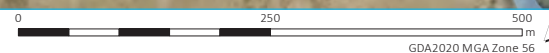
- Site boundary
- Existing environment
- Major road
- Minor road
- Vehicular track
- Named watercourse
- Named waterbody

Activity area

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 1.2



Source: EMM (2023); DFSI (2017, 2020); Metromap (2023)





SITE PLAN

Pedavoli Architects / Blakebrook Public School / Design Workshop / Concept Design

Plate 1.1 Concept design (Pedavoli Architects 2023)



Plate 1.2 Blakebrook Public School, sections - draft (Pedavoli Architects 2023)

1.3 Legislative context

There are several Commonwealth and state Acts (and associated regulations) that manage and protect Aboriginal cultural heritage (Appendix A). These are summarised in Table 1.1.

Table 1.1 Commonwealth and State legislation relevant to the project

Legislation	Description	Relevant to the project?	Details
Commonwealth			
<i>Environment Protection and Biodiversity Conservation Act 1999</i>	Recognises sites with universal value on the World Heritage List (WHL). Protects Indigenous heritage places with outstanding heritage value to the nation on the National Heritage List (NHL), and significant heritage value on the Commonwealth Heritage List (CHL).	No	There are no Indigenous heritage places within the project area that are listed on the WHL, NHL, or the CHL.
<i>Native Title Act 1993</i>	Established a system for recognising Aboriginal and Torres Strait Islander peoples' rights and interests over lands and waters by Aboriginal people. Provides for negotiation and registration of Indigenous Land Use Agreements (ILUAs). Often used in NSW to identify relevant stakeholders for consultation.	No	The land is freehold and not subject to the provisions of the native title act. The Widjabul Wia-bal Gurrmbil Aboriginal Corporation is the Registered Native Title Body Corporate (RNBTC) of the project area. Representatives of this organisation were consulted as part of the ACHA.
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i>	Preserves and protects declared areas and objects of particular significance to Aboriginal and Torres Strait Islander people that are under threat from injury or desecration.	No	There are no areas or objects within the project area subject to a Declaration under the Act.
State			
<i>Environmental Planning and Assessment Act 1979</i>	Requires environmental impacts, including to Aboriginal heritage, to be considered in land use planning. Provides for the development of environmental planning instruments, including State Environmental Planning Policies and Local Environmental Plans.	Yes	The project is being assessed as a Development Application (DA) to Lismore City Council (Council) project under this Act. Aboriginal heritage impact assessment is required (in accordance with standard Heritage NSW procedures and guidelines) to assess whether the project has the potential to impact on Aboriginal objects, sites, or places of Aboriginal heritage significance.
<i>National Parks and Wildlife Act 1974</i>	Provides blanket protection for all Aboriginal objects and declared Aboriginal places. Includes processes and mechanisms for development where Aboriginal objects are present, or where Aboriginal Places are proposed for harm.	Yes	The NPW Act remains in force for the project in relation to the discovery, impact notification and care of Aboriginal objects in NSW.

Table 1.1 Commonwealth and State legislation relevant to the project

Legislation	Description	Relevant to the project?	Details
<i>Aboriginal Land Rights Act 1983</i>	Establishes Local Aboriginal Land Councils (LALCs). Allows transfer of ownership of vacant crown land to a LALC. The Office of the Registrar, <i>Aboriginal Land Rights Act 1983 (ORALRA)</i> , registers Aboriginal land claims and maintains the Register of Aboriginal Owners. Often used in NSW to identify relevant stakeholders for consultation.	No	The project area is within the boundaries of the Ngulingah Local Aboriginal Land Council (LALC). A request to search the Register of Aboriginal Owners was made to the ORALRA on 5 June 2023. The project area does not appear to have Registered Aboriginal Owners pursuant to Division 3 of the Act.

1.4 Limitations

This report is based on existing and publicly available environmental and archaeological information (including the Aboriginal heritage information management system (AHIMS) data) and reports about the project area. The background research did not include any independent verification of the results and interpretations of externally sourced existing reports (except where the ground-truthing was undertaken). The report further makes archaeological predictions based on these existing data and targeted ground-truthing, and which may contain errors depending on the accuracy of these third-party studies and the extent of ground-truthing investigations.

This report does not consider historical and/or built heritage unless specifically related to Aboriginal heritage values. This is addressed in a separate report undertaken for the project.

2 Aboriginal consultation

2.1 Key findings

- The assessment adopted the processes and methods outlined in Heritage NSW's *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* guidelines.
- The consultation process identified that Widjabul Wia-bal Gurrmbil Aboriginal Corporation is the Registered Native Title Body Corporate (RNBTC) established by Widjabul Wia-bal to hold native title rights and interests and to progress Widjabul Wia-bal's interests. NTSCORP Ltd is the legal representative of the Widjabul Wia-bal Gurrmbil Aboriginal Corporation. In accordance with the guidelines, no further notification process or registration of Aboriginal participants occurred once the native title claimant was identified and all subsequent stages included the involvement of solely the native title claimant.
- Survey and test excavation program was undertaken in August 2023. These included representatives of Widjabul Wia-bal Gurrmbil Aboriginal Corporation.
- The Widjabul Wia-bal Gurrmbil Aboriginal Corporation has provided feedback throughout the project and on the report during the review period. The Widjabul Wia-bal Gurrmbil Aboriginal Corporation are supportive of the findings and recommendations of the report and requested that cultural monitoring and an unexpected finds procedure be considered in the ACHA.

A summary of the consultation process is provided below, and full documentation of the consultation process is provided in Appendix B.

2.2 The process

Aboriginal consultation for this project has been undertaken in accordance with procedures set out in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010). These guidelines identify a five-stage process.

1. Pre-notification – identification of the Aboriginal individuals and/or communities relevant to the project area by contacting several state government agencies.
2. Notification – contacting all Aboriginal individuals and/or communities identified in Stage 1 to determine their interest in being consulted during the project. Aboriginal individuals and/or communities that wish to be consulted become a 'registered' Aboriginal party (RAP).
3. Presentation of project information/assessment methodology – briefing RAPs about the project and scope of any Aboriginal heritage assessment and investigations. This is usually undertaken through written correspondence, but can include meetings, and may undergo several iterations through the project as the nature of the assessment changes (e.g. surface ground-truthing may lead to a requirement for test excavations).
4. Impacts and mitigation strategies – discussion of potential impacts to cultural materials and mitigation options with the RAPs prior to developing the ACHA. This is often undertaken either onsite at the end of any field program and/or as part of Stage 4.
5. Report review – the RAPs are provided an opportunity to review and comment upon the draft ACHA, to contribute input into the overall findings, significance and management of cultural heritage.

The consultation process for this project had two aims:

1. to comply with the mandated consultation procedures to obtain input on the ACHA process
2. to identify cultural places and intangible values that may be affected by the project.

2.3 This project

A complete log of actions and correspondence regarding Aboriginal community consultation is included in Appendix B and summarised in Table 2.1.

Overall, the consultation process identified Widjabul Wia-bal Gurrmbil Aboriginal Corporation as a key Aboriginal stakeholder in the region via NTSCorp (Appendix B.2) and registered an interest in the project (Appendix B; Table 2.2). As the recognised native title claimant of the region, Widjabul Wia-bal Gurrmbil Aboriginal Corporation were the only registered Aboriginal party (RAP) for the project and, as such, were the only locally based organisation that participated in the field investigations in August 2023.

Table 2.1 Consultation process summary

Stage	Description	Date started	Date completed	Notes
1	Government Agency Pre-Notification	2 June 2023	16 June 2023	Additional details provided in Appendix B.1.
	Notification from NTSCorp confirming the Widjabul Wia-bal Gurrmbil Aboriginal Corporation is the Registered Native Title Body Corporate (RNBTC) and hold native title rights and interests	21 June 2023		Additional details are provided in Appendix B.2.
	Presentation of information about the proposed project and gathering information about cultural significance	20 June 2023		Additional details are provided in Appendix B.3.
2/3	Fieldwork - survey	14 August 2023	14 August 2023	Attended by two Aboriginal participants. Additional details are provided in Section 6.
	Fieldwork – test excavation	14 August 2023	16 August 2023	Attended by two Aboriginal participants. Additional details are provided in Section 6.
4	Review of draft report	25 September 2023	10 October 2023	Additional details are provided in Appendix B.4.

Table 2.2 List of registered Aboriginal parties for the project

Organisation	Contact
Widjabul Wia-bal Gurrmbil Aboriginal Corporation	Noel King Jnr
	Chris Brown Jnr
	Aunty Queenie Speeding
	Jamal Roberts

2.4 Aboriginal stakeholder feedback

A draft version of this report, which included all background information, results, draft significance assessment and draft management recommendations, was issued to Widjabul Wia-bal Gurrmbil Aboriginal Corporation on 25 September 2023 accompanied by an email specifying a 28-day timeframe for review.

Due to broader project timeframes, SINSW were hoping to finalise the ACHA report for the Blakebrook Public School as soon as possible and, as such, a meeting was held with Widjabul Wia-bal Gurrmbil Aboriginal Corporation representatives on 10 October 2023 to go through the draft ACHA. The purpose of the meeting was to run through the report, highlight the key findings and proposed archaeological management, and minute/document any concerns or questions for inclusion in a finalised version of the report.

Noel King Jnr attended the meeting and provided the following information and feedback. Minutes taken at the meeting are provided in Appendix B.5.

Noel King Jnr of Widjabul Wia-bal Gurrmbil Aboriginal Corporation:

- supported the recommendations of the report but would like the proponent to consider:
 - having representatives from Widjabul Wia-bal Gurrmbil Aboriginal Corporation inspect/monitor ground disturbance activities:
 - across cut and fill locations for the entire construction footprint to check that there are no natural soils present below current recorded fill deposits
 - within the 10 m buffer area (site extent) of NRBL IF1 (AHIMS #04-4-0321)
 - having reference to an unexpected finds protocol.

EMM notified the proponent of the feedback given by the Widjabul Wia-bal Gurrmbil Aboriginal Corporation in the draft ACHA meeting and recommended that they consider incorporating cultural monitoring as a recommendation in Section 10. The proponent is not supportive of including cultural monitoring as a recommendation in the ACHA due to the sensitivity of the construction program schedule and the need for efficient progression of works.

EMM notified the Widjabul Wia bal Gurrmbil Aboriginal Corporation of the proponent's decision and also informed them that unexpected finds procedures (especially in relation to Ancestral Remains) are expected to be included in the conditions of the AHIP.

All feedback and correspondence are presented in Appendix B.

3 Existing environment

3.1 Key findings

- The project area is situated on the boundary of two physiographic regions of the Clarence-Moreton bioregion (that extends from the far north-east of NSW and south-east Queensland): the Clarence Lowlands and Toowoomba Plateau and also on the Richmond-Tweed subregion of the NSW North Coast bioregion. The project area can be characterised as level to gently undulating broad to extensive alluvial plains of very low relief
- The geology of the project area comprises Tertiary volcanic basalt, rhyolite and trachyte lithologies of the Lamington volcanic complex and Lismore Basalts-Tertiary basalts, which may also include sandstones, shales, chert and quartz.
- The project area is in general proximity to two permanent watercourses, Terania Creek and Goolmangar Creek, that were likely utilised by Aboriginal people in the past. However, they are some distance from the project area, limiting potential for preserved buried cultural material and other evidence of Aboriginal use to be present.
- The project area has been extensively cleared of native vegetation. A row of mature *Camphor laurel* trees is located along the boundaries of the site dating to the early 20th century. Culturally modified trees are unlikely to be present on site.
- The project area has been subject to moderate levels of disturbance including past pastoral and agricultural activities in the 19th century, establishment of school related structures and services in the early 20th century and land levelling in the east, landscaping, and upgrades to school facilities. This suggests that while there is potential for both surface and subsurface stone artefacts to be present within the project area, they are likely to be found in disturbed contexts. Geotechnical investigations undertaken in 2023 by Tetra Tech Coffey provided evidence of clay fill located at 1.1 m depth above natural deposits in some areas across the project area.

3.2 Environmental context

3.2.1 Rationale

Understanding environmental context assists with predictions of archaeological potential, such as the likelihood of archaeological material being present in the landscape, its spatial distribution and its preservation. Landscape features were an important factor for the choice of camping and transitory and ceremonial areas used by Aboriginal people. Similarly, these landscape features and historical land-use plays a role in the level of preservation and the integrity of archaeological sites.

A landscape consisting of suitable topography, hydrology, geology and soils has strong links with natural resources that would have been available to, and sought after, by Aboriginal people. Flora and fauna would have provided food, tools and ceremony (culturally modified trees); proximity to fresh water was necessary for life and growing crops, as well as gathering fish and eels. Landscape features, such as sandstone overhangs, were useful for shelter; stone artefacts were manufactured from raw stone material that was collected from quarry sites and stone arrangements relied on the landscape.

3.3 Landscape overview

Bioregions are relatively large land areas characterised by broad, landscape-scale natural features and environmental processes that capture large-scale geophysical patterns at an ecosystem scale. Sub-regions delineate significant geomorphic patterns within a bioregion, and are based on finer differences in geology, vegetation and biophysical attributes (Bannerman & Hazelton 1990).

The project area is located within the Clarence - Morton bioregion of north-east NSW and south-east QLD (bioregionalassessments.gov.au), which is typically characterised by elevated ranges and escarpments to the north and west which form the headwaters of many rivers in the region. These rivers are known to flow out onto restricted floodplains and coastal flats. The project area is situated in the north-west of the Wilson's River catchment, a relatively narrow floodplain within the broader Richmond River basin. Topographically, the area is known for its hills and escarpments up to 140 m in elevation surrounding the project area and descending to the relatively level plain of the project area (bioregionalassessments.gov.au). The topography varies between 5 m to 20 m above sea level.

The existing environment heavily influences the potential types of cultural material that may be present in the project area. Typically, sites such as rock shelters (and associated features) require steep relief and/or geological outcroppings that form overhangs etc. Similarly, grinding grooves usually require exposed smooth geological outcrops in or near rivers. While such relief is documented in the bioregion, there is no relief as such present within the project area. It is expected that cultural materials would therefore be limited to surface and/or sub-surface cultural materials in the form of stone and/or shell artefacts.

3.4 Hydrology

Terania Creek, a 3rd order permanent watercourse, is located 400 m east of the project area, with Goolmangar Creek, also 3rd order, is situated some 250 m west. The confluence of these two streams lies 500 m south of the project area and from this point, Terania Creek continues as a 4th order watercourse, connecting with Leycester Creek and eventually Wilson's River 6 km to the south-east of the project area. Wilson's River then flows to the Richmond River, one of the major river systems of the Northern Rivers region, placing the project area at the headwaters of a major hydrological network of the bioregion.

Flooding events have historically occurred in the region, including the most recent flooding event which impacted the project area in March 2022.

3.5 Geology, geomorphology, and soils

Geology, geomorphology and soil landscapes classifications and their boundaries provide pre-defined areas that are classified by several geographic features, and which are informative for the archaeological investigation. They provide localised information including landform patterns, soils, geology, rock outcrop percentage, land use and vegetation. This information provides another layer to categorise the landscape for the predictive model, additional to what a topographic description can provide. Soil landscape information builds on underlying geology and describes the depths of residual soils and colluvial soils and identifies areas that are characterised by erosion or skeletal soils and exposed bedrock versus those that may contain a deeper profile where cultural material may be buried.

3.5.1 Geology

The project area is located within the Richmond-Tweed subregion of the North Coast bioregion. The region is typified by volcanic ranges and gullies wherein the geology is characterised by Jurassic lithic and quartz sandstones, shale, volcanics of the Mt Warning complex, sheet basalts, rhyolite and tuffs (NPWS 2003, p.176). The project area is also situated on the boundary of two physiographic regions of the Clarence-Moreton bioregion (that extends from the far north-east of NSW and south-east Queensland): the Clarence Lowlands to the south and Toowoomba Plateau to the north (Rassam et al., 2014). The coastal lowlands of the Clarence Lowlands are typically situated upon weak sedimentary rocks. The Toowoomba Plateau comprises a basaltic plateau terminating at Mt Warning, a dissected volcanic pile (~65 km north of the project area). On alluvial plains, tertiary to Quaternary silts, clays, alluvial sands and gravel infill of the coastal river basins are present (Rassam et al., 2014).

The geology across the project area is comprised of Tertiary volcanic basalt, rhyolite and trachyte lithologies of the Lamington volcanic complex and Lismore Basalts-Tertiary basalts (NSW Government Mining, Exploration and Geoscience 2023; Morand 1994, p.42,55). There are no rock outcroppings within the project area, however, approximately ~100 m north, an outcropping of Tertiary volcanics is present on an infilled plain.

3.5.2 Soil Landscapes

Soil landscape classifications and their boundaries provide pre-defined areas that are classified by several geographic features, and which are informative for the archaeological investigation. They provide localised information including landform patterns, soils, geology, rock outcrop percentage, land use and vegetation. This information provides another layer to categorise the landscape for the predictive model, additional to what a topographic description can provide. Soil landscape information builds on underlying geology and describes the depths of residual soils and colluvial soils and identifies areas that are characterised by erosion or skeletal soils and exposed bedrock versus those that may contain a deeper profile where cultural material may be buried.

The project area soil landscapes are derived from the OEH Soil Landscapes of Lismore-Ballina 1:100,000 Sheet (Morand 1994). The Blakebrook Public School project area occurs on the Leicester soil landscape (le) (Figure 3.3). This landscape is characterised by level to gently undulating broad to extensive alluvial plains of very low relief and draining the MacKellar Hills (Morand 1994). Dominant soil materials, as illustrated in Plate 3.1, includes a soil profile of usually 50 cm self-mulching black light clay and alluvial black earths, which overlies cracking medium heavy clay (le2). Channels often include dark brown loamy to clayey sand in line channels (well-drained Earthy Sands as noted in Plate 3.1). Overall, total soil depth is typically >200 cm, with cultural materials generally constrained to the upper 40–50 cm of these profiles (le1).

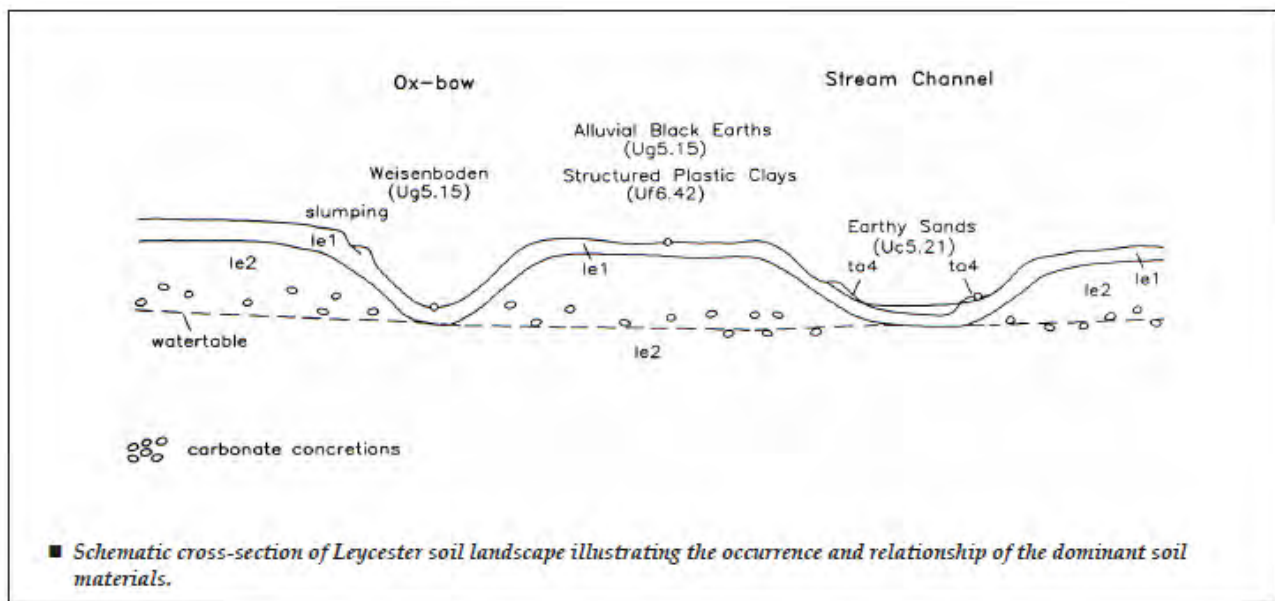


Plate 3.1 **Leycester soil cross section (Source: Morand 1994)**

i **Geotechnical Investigations (Tetra Tech Coffey 2023)**

A geotechnical assessment was undertaken by Tetra Tech Coffey across the project area in July 2023 (Tetra Tech Coffey 2023).

Four boreholes were undertaken across the project area which demonstrated a consistent soil profile across the site, characterised as areas of modern fill over-lying units of silty clay and sandy clay alluvium. (Test excavations indicate that these under-lying alluvium is of significant age, potentially pre-cultural, given its indurated nature). The fill was generally found in the centre of the project area to the west at depths of <1.1 m and found in BH BLA-C-3 and BH04. Beneath the fill, the alluvium was described as consisting of clay, of various red, yellow, brown or grey colour, with medium plasticity and fine to medium grained gravels extending to depths of 2.2 m–4.8 m across the site. Boreholes BLA-C-BH1, BLA-C-BH2, BH02, BH03 and BLA-C-BH4 revealed a red brown to dark brown clay alluvium deposit (Tetra Tech Coffey 2023).

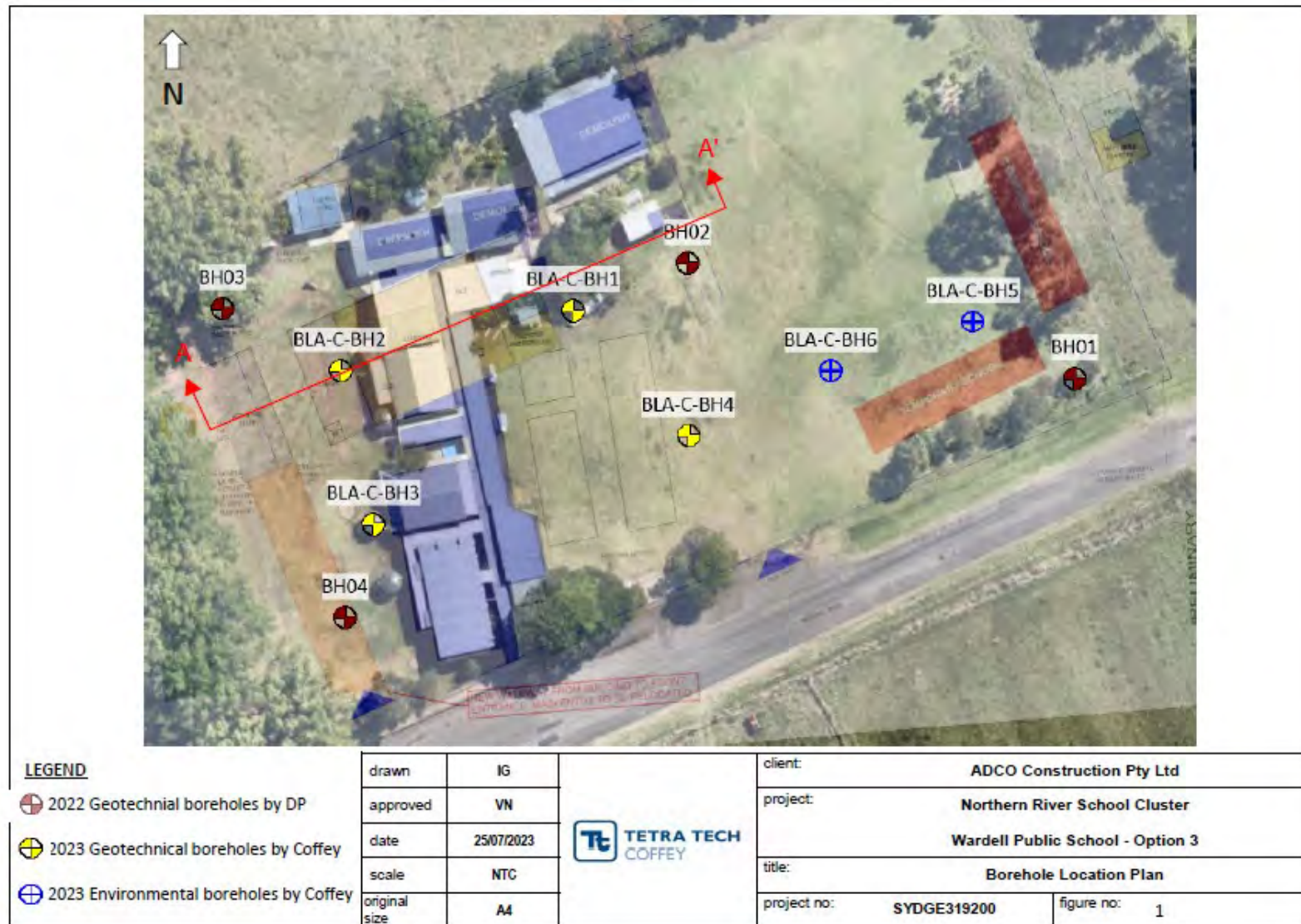


Plate 3.2 The geotechnical program undertaken for the project area (Source: Tetra Tech Coffey 2023)

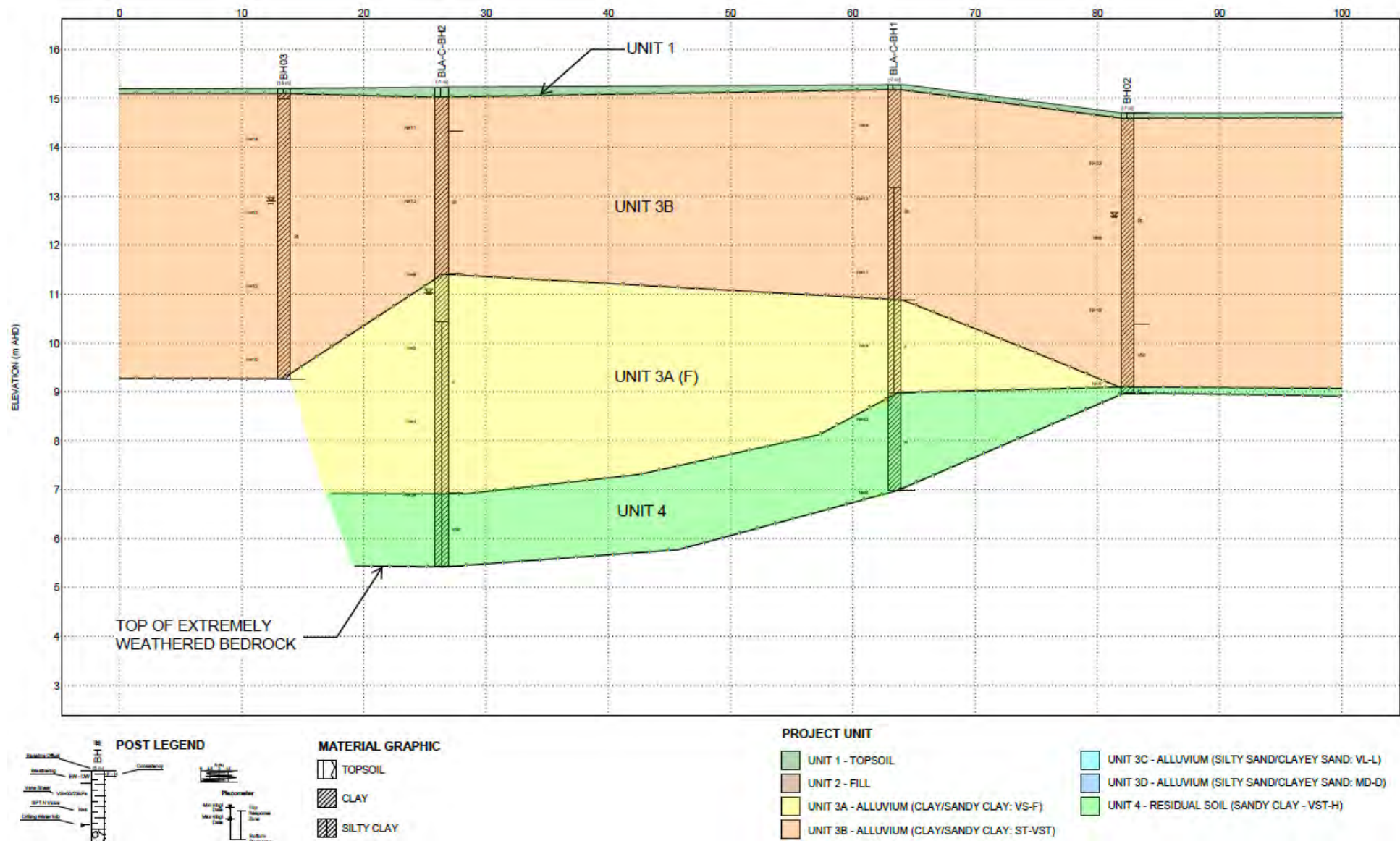


Plate 3.3 Section A-A Blakebrook Public School, (Source: Tetra Tech Coffey 2023)

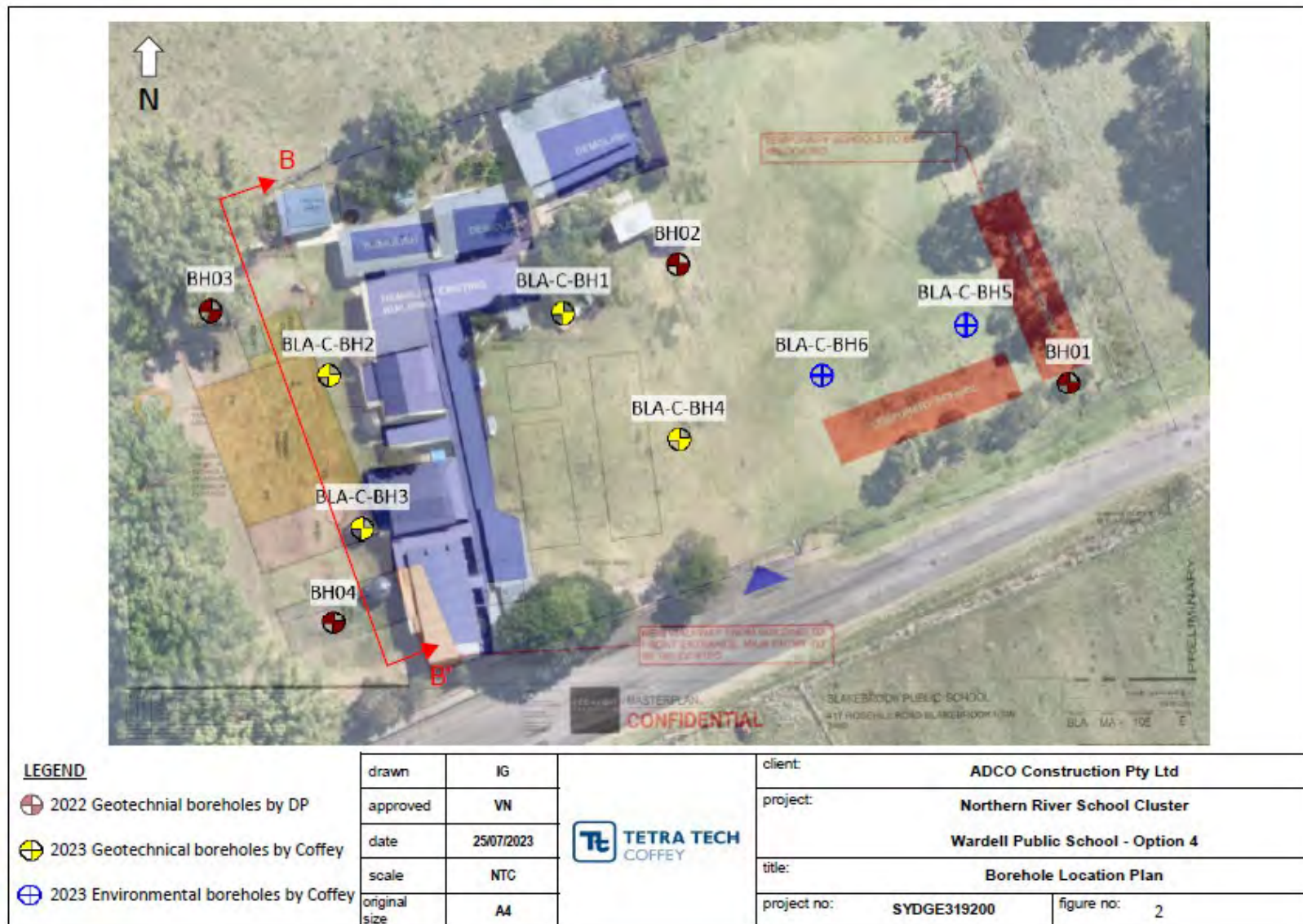


Plate 3.4 The geotechnical program undertaken for the project area (Source: Tetra Tech Coffey 2023)

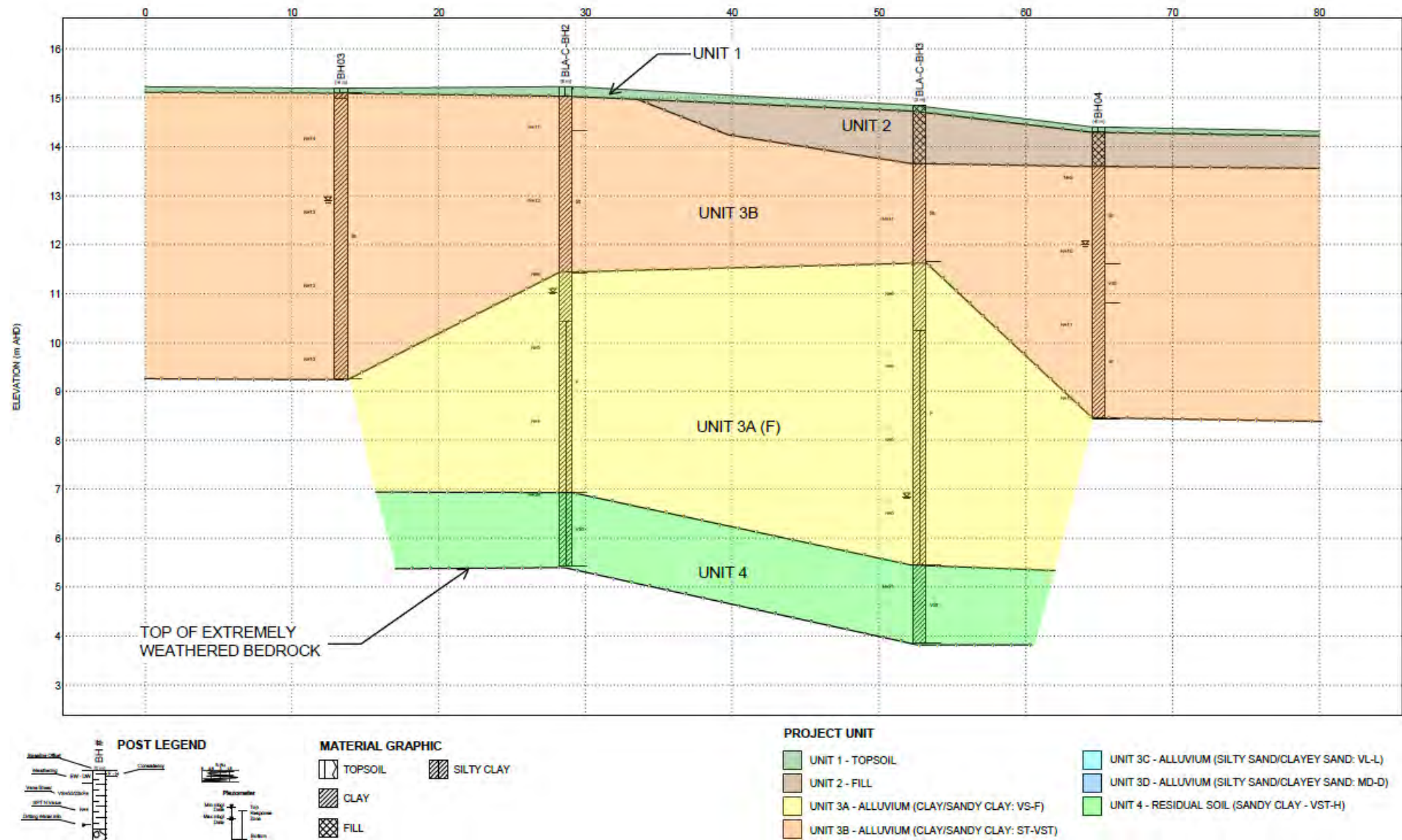


Plate 3.5 Section B-B Blakebrook Public School, (Source: Tetra Tech Coffey 2023)

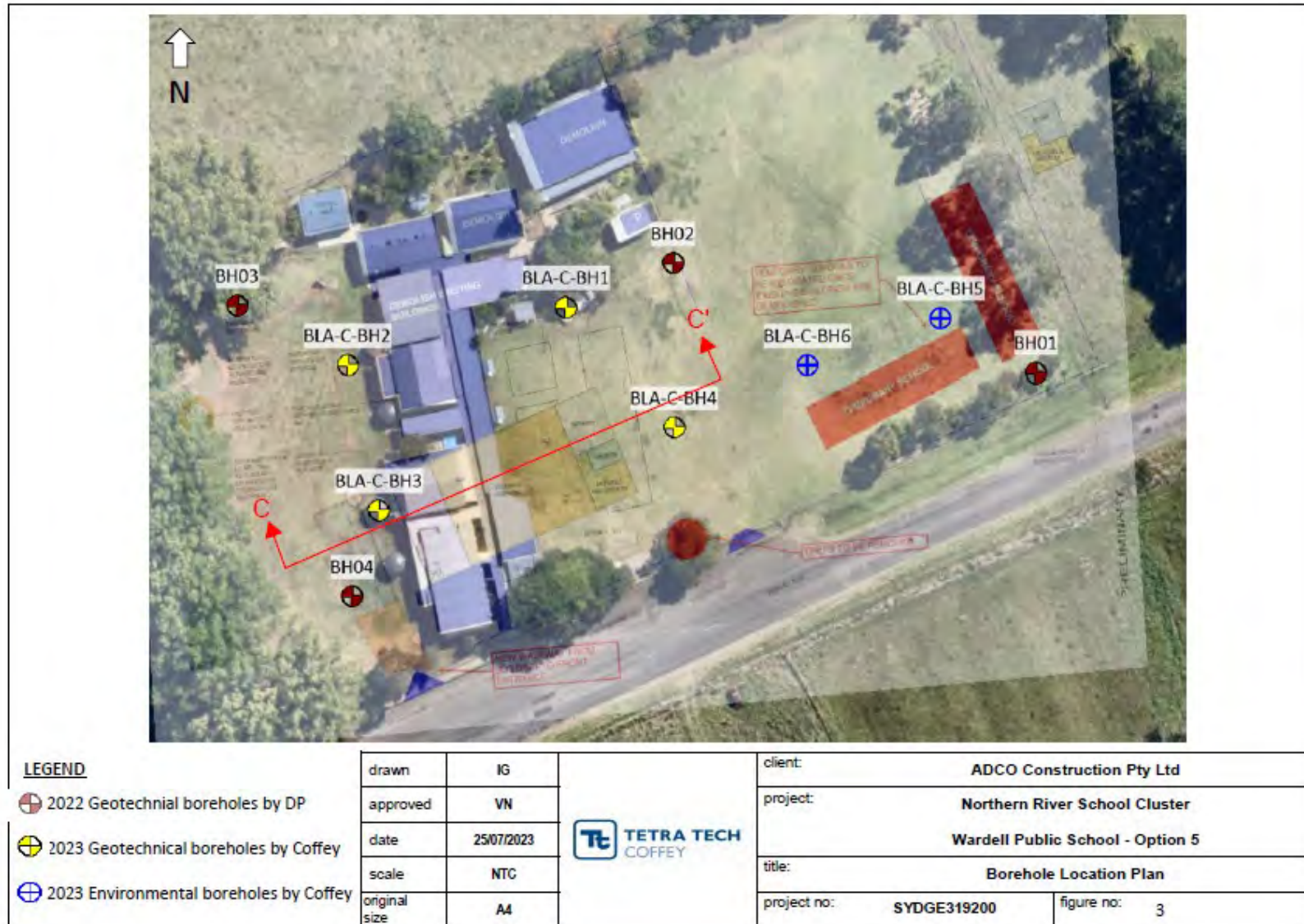


Plate 3.6 The geotechnical program undertaken for the project area (Source: Tetra Tech Coffey 2023)

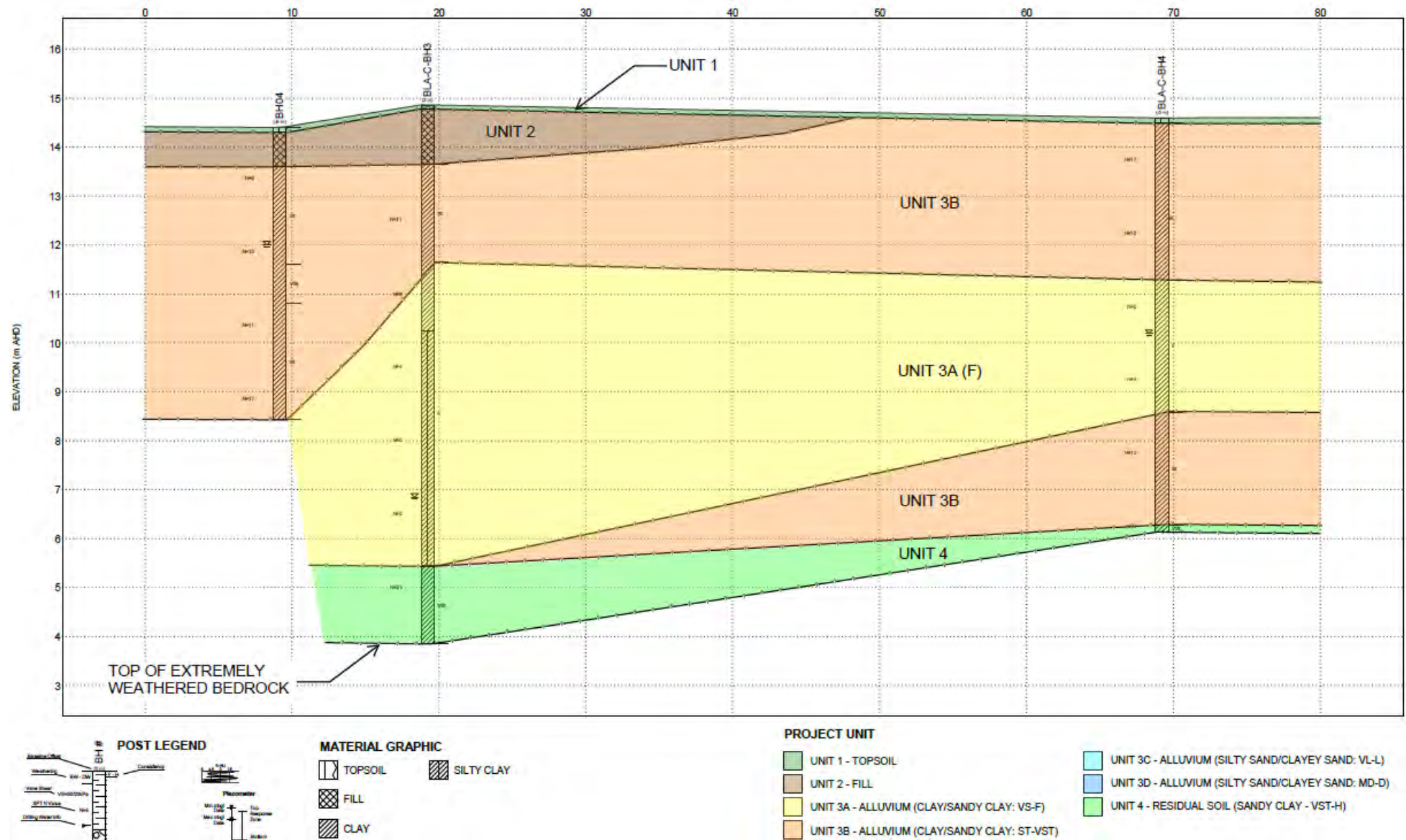


Plate 3.7 Section C-C Blakebrook Public School, (Source: Tetra Tech Coffey 2023)

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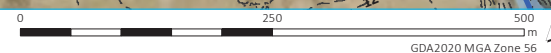
- KEY**
- Site boundary
 - Strahler stream order
 - 1st order
 - 2nd order
 - 3rd order
 - 6th order
 - 7th order
 - Existing environment
 - Major road
 - Minor road
 - Vehicular track
 - Topographic contour (2 m interval)
 - Named waterbody

Topography and hydrology

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 3.1



Source: EMM (2023); DCSSS (2023); DFSI (2017, 2020); Metromap (2023); DPI (2017)



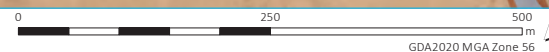
GDA2020 MGA Zone 56

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- KEY**
- Site boundary
 - Existing environment
 - Major road
 - Minor road
 - Vehicular track
 - Named watercourse
 - Named waterbody
 - Seamless geology
 - Cenozoic Igneous Province
 - Lismore Basalt (NMLal)
 - Cenozoic Sedimentary Province
 - Alluvial channel deposits - subaqueous (Q_acw)
 - Alluvial floodplain deposits (Q_af)

Source: EMM (2023); DFSI (2017, 2020); Metromap (2023); DPIE (2021)



Geology

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 3.2



\\lemmsvr\EMM\2023\230642 - Northern Rivers Recovery Project Stage 2\GIS\02 Maps\ Blakebrook\ACHA006 Soil Landscapes 20230608 01.mxd 22/09/2023



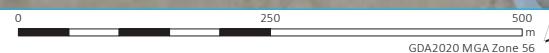
- KEY**
- Site boundary
 - Existing environment
 - Major road
 - Minor road
 - Vehicular track
 - Named watercourse
 - Named waterbody
 - Soil landscapes
 - Disturbed terrain (xx)
 - Georgica (ge)
 - Leycester (le)

Soil landscapes

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 3.3



Source: EMM (2023); DFSI (2017, 2020); Metromap (2023); DPIE (2021)



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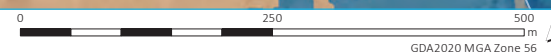
- KEY**
- Site boundary
 - Existing environment
 - Major road
 - Minor road
 - Vehicular track
 - Named watercourse
 - Plant community type
 - Not classified
 - 3001 | Lismore Basalt Subtropical Rainforest
 - 3002 | Lower Richmond Hills Dry-Subtropical Rainforest
 - 3172 | Northern Ranges Brush Box-Flooded Gum Wet Forest
 - 3251 | Northern Gorges Diverse Grassy Forest
 - 3322 | Far North Ranges Red Gum Grassy Forest
 - 3323 | Far North Lowland Basalt Grassy Forest
 - 3420 | Clarence Lowland Ironbark-Spotted Gum Grassy Forest
 - 3422 | Clarence Sandstone Rises Spotted Gum Grassy Forest
 - 4034 | Far North Swamp Oak-Tuckeroo Swamp Fringe Forest
 - 4046 | Northern Lowland Swamp Turpentine-Red Gum Forest
 - 4070 | Far North River Oak Wet Forest

Pre-1750 vegetation mapping

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 3.4



Source: EMM (2023); DCSSS (2023); DFSI (2017, 2020); Metromap (2023); DPI (2017)



3.6 Vegetation

The natural vegetation of a landscape is an important consideration when preparing an Aboriginal heritage assessment because it provided Aboriginal people with resources. Bark from trees could be stripped to make canoes, shields, housing and other items. The vegetation itself provided food resources such as edible plants, fruits and seeds, windbreaks and shelter, and also provided habitats for animals such as possums and birds and herbivores, which could be hunted or skinned for clothing and other purposes (Turnbull et al. 2019:188, Attenbrow 2010:7–78).

Today, the region is characterised by extensive clearing, farming and residential development; however prior to European contact, the native vegetation would have comprised sub-tropical and warm temperate rainforests, coastal floodplain wetlands and wet sclerophyll forests (DPIE 2010). Dominant tree species would have included narrow-leaved paperbark (*Melaleuca alternifolia*), spotted gum (*Corymbia maculata*), grey gum (*Eucalyptus punctata*), forest red gum (*Eucalyptus tereticornis*), blackbutt, (*E. pilularis*), red bloodwood (*Corymbia gummifera*), white mahogany (*Eucalyptus acmenoides*), black booyong (*Argyrodendron actinophyllum*), white booyong (*A. trifoliolatum*), hoop pine (*Araucaria cunninghamii*), bangalow palm (*Archontophoenix cunninghamiana*), rough tree fern (*Cyathea australis*), Australian cedar (*Toona ciliata*), teak (*Tectona grandis*), small-fruited grey gum (*E. propinqua*), tallowwood (*E. microcorys*) and Sydney blue gum (*E. saligna*) (Rassam et al., 2014, p.112; Atlas of Living Australia, 2021). Many of these species would have provided materials and medicine for past Aboriginal populations.

The project area contains no known native vegetation, comprising large stands of introduced species including camphor laurel (*Cinnamomum camphora*) and jacaranda trees planted sometime in the early-mid twentieth century.

The availability of permanent freshwater and estuarine streams and channels, including Terania Creek (400 m east), Goolmangar Creek (200 m west) and the Wilsons River (6 km south-east), would have provided suitable habitats for a vast range of amphibians, reptiles and mammals as well as sea birds, shore birds and land birds, freshwater fish species, shellfish, edible bivalves, invertebrate worms and crustacean resources. The diverse wet sclerophyll forest, rainforest and wetland associations support a range of ground and arboreal animals including snakes, native rats, lizards, bandicoots, antechinus, wallabies, possums, gliders, forest birds and bats. Echidna range from coastal dunes to heathlands, floodplain forests, sclerophyll forests and rainforests. Koalas are also dependant on large areas of eucalypt forests and woodlands, especially, forest red gum, swamp mahogany, tallowwood and small-fruited grey gum. Key faunal species known to occur near the project area include the koala (*Phascolarctos cinereus*), red-necked wallaby (*Notamacropus rufogriseus*), short-beaked echidna (*Tachyglossus aculeatus*), mountain brushtail possum (*Trichosurus cunninghami*) and common ringtail possum (*Pseudocheirus peregrinus*). A number of these species would have been exploited by Aboriginal people predominantly as food sources or for clothing and other purposes (Atlas of Living Australia, 2021).

3.7 Land use history

Extensive historical land clearance has taken place across lower elevations in the region, including the project area, since the 19th century. Timber-getting, pastoral agriculture and cropping were primary causes of the removal of native vegetation. Pockets of remnant rainforest remained throughout the region, many of which have since been protected. Prior to its use as a school, the project area was initially part of 19,200 acre (7,770 ha) Tunstall Run taken up in 1843 (Stubbs 2007, p.11; Lismore City Council 2022). Pastoral land clearance would have likely occurred during this time to supplement the cattle station. By 1862, pastoralist Edward Flood was granted title of 180 acres (72.8 ha) of the land, known as Rose Hill (also Rosehill) that included the project area (Lismore City Council 2022).

The project area was primarily utilised for timber getting and cattle grazing with old yards, roads and other features of Edward Hill's property identified in the crown plan of the site (Plate 3.8). These practices continued into the twentieth century. In 1905 two acres (0.8 ha) were resumed from Rose Hill for the public school. In 1906, a weatherboard school house was constructed in the centre of the project area, remaining to the present day, with the school opening in 1907 (*The Sydney Morning Herald*, 2 June 1906). In 1909, a teacher's residence was constructed although its exact location is undetermined (possibly in the north-east from available historic aerial imagery in Table 3.1).

A large row of mature camphor laurel trees lines the western and southern boundary, and three mature jacarandas are present in the north. Their planting possibly dates to the Inter-War period between 1918 to 1939 (S170 Heritage register). In the mid-20th century, two additional weatherboard buildings were imported to the school site following the closing of Boggumbil public school in 1946 and Tuncester in 1972. The school has undergone several upgrades throughout its tenure, including a level sports field (in the east), additional buildings and hard-stand areas. Recently, additional buildings were implemented in response to the severe flood damage caused by the 2022 northern rivers floods, prior to the decision to completely rebuild the school.

Available historical aerial imagery provides a visual insight into the land use of the project area since ~1957 and is described in detail in Table 3.1. In 1957, the school site appears to contain two large buildings located centrally within the project area. These buildings are most likely the original 1906 constructed weatherboard and Boggumbil school houses. Mature plantings, presumably camphor laurel, mark the school's western boundary and, to the south, the three jacaranda trees are prominent. The remaining land is cleared of any other vegetation. In the north-east of the school, a fenced area is present, which may mark the location of the 1909 constructed teacher's residence (*The Richmond River Herald and Northern Districts Advertiser*, 15 January 1909).

The 1970 aerial photograph also shows the 1906 school house and Boggumbil school house centrally located in the west of the property. Sometime between 1959 and 1970, a number of buildings were constructed east of the main school houses. These structures may include the teacher's residence, bathroom facilities, and stores. To support the construction of these additional buildings, the cleared western area of the school may have been utilised as an area of hard stand for construction utilities and machinery. The aerial imagery depicts the grassed western area as being fairly discoloured in comparison to the eastern side. Between 1970 and 2009, further additional buildings were constructed and levelling of the sports field (east) reflecting the school's ongoing infrastructure upgrades. The most recent available imagery from 2022 shows further, larger scale developments undertaken at the school, with two large rectangle buildings present in the central south area and a small building in the far north. The school is bounded to the west, north and east by large stands of mature trees, with a small cluster present along the southern boundary near the entrance of the school. A semi-circular area of the grassed west portion of the school, in proximity to the tree line appears to have been scraped back to the surface soil layer. This may be resultant of the 2022 floods, natural causes or purposefully prepared for landscaping activities.

In summary, the project area has been subject to high levels of historical disturbance. Based on vegetation clearing activities, there is very limited potential for culturally modified trees to be present within the project area. As the school expanded and new buildings were constructed and extended, more substantial impacts to the underlying soils (and any Aboriginal objects within them) were likely experienced from the installation of services and footings, school infrastructure and levelling, evidenced by modern fill layers reaching maximum depths of ~1.1 m in the centre-west of the school (Section 3.5.2i) (Tetra Tech Coffey 2023).



Plate 3.8 Detail from crown plan 38A-1539, “Resurvey” of Lot 214, 1862. The school site is indicated by ‘P.S.’.

Table 3.1 **Historical aerial photographs of the project area between 1957 to present (Source: NSW Government Spatial Services 2023, Historical Imagery Viewer; SIX maps; Google Earth Pro 2023)**

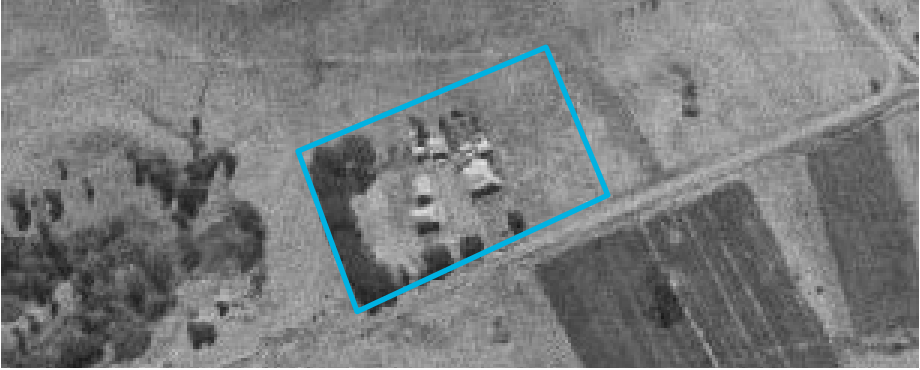
Aerial photograph	Year of aerial photograph and description
	<p>1957</p> <ul style="list-style-type: none"> Two buildings in the centre of the project area, bounded to the west and south by stands of mature trees. In the north-east, a fenced area is apparent which may be the teacher's residence. The remaining landscape is empty of vegetation.
	<p>1970</p> <ul style="list-style-type: none"> Additional buildings have been constructed sometime between 1957 and 1970. A number of structures are prominent in the north-east portion of the school, with the western area remaining relatively untouched. The western area may have been utilised as an area of hard stand for the construction of the various new buildings across the project area, with the area seemingly discoloured in comparison to the grassed eastern area.

Table 3.1 **Historical aerial photographs of the project area between 1957 to present (Source: NSW Government Spatial Services 2023, Historical Imagery Viewer; SIX maps; Google Earth Pro 2023)**

Aerial photograph	Year of aerial photograph and description
	<p>1990</p> <ul style="list-style-type: none"> • Additional buildings have been constructed sometime between 1970 and 1990. • All buildings are connected via an undercover walkway that runs parallel to the central buildings in the east. • The presumed teacher's residence in the north-eastern area appears to have been removed/demolished with a small single standing (possible shed) remaining. • A number of mature trees appear to have been removed from the southern boundary of the school, replaced with new plantings. • A small cluster of trees in the north-east now bound the school buildings.
	<p>2009</p> <ul style="list-style-type: none"> • A new building is present in the north, with the removal of the small building in the north-east occurring sometime between 1990 and 2009. • Vegetation in proximity to the central school buildings have been removed. • A line of trees bounding the north boundary of the project area is present. • The sports field in the east appears to have been levelled.

Table 3.1 **Historical aerial photographs of the project area between 1957 to present (Source: NSW Government Spatial Services 2023, Historical Imagery Viewer; SIX maps; Google Earth Pro 2023)**

Aerial photograph	Year of aerial photograph and description
	<p>2022</p> <ul style="list-style-type: none"> • Two large rectangle buildings are present in the central south of the school. • A smaller building is present in the far north, on the site boundary. • Stands of trees now about the west, north and east boundaries of the school. • In the west, in proximity to the tree line, the grassed area appears to have been scraped back to the surface soil, reaching the school buildings in the north.

4 Ethno-historical context

4.1 Key findings

- The project area lies within the traditional lands of the Bundjalung people, an area which expanded across northern NSW, from Grafton in the south, west to Tenterfield and Allora and Beaudesert in Queensland. The local dialect group of Blakebrook is the Widjabul.
- While historical information provides several observations in relation to the early nineteenth century and twentieth century Aboriginal society, in particular at nearby Cubawee (Tuncester), Terania Creek and Dunoon, no site-specific areas of activity were identified.
- No specific ethnographic observations, activities or events were documented within the project area.

4.2 Regional information

Information about the socio-cultural structure of Aboriginal society prior to European contact largely comes from ethno-historical accounts made by colonial settlers. The primary focus of the majority of these accounts was to record early European expeditions, not Aboriginal culture. These accounts and observations were often made after significant social disruption due to disease and displacement. As a result, this information is often contentious, particularly in relation to language group borders. Therefore, it is likely that language group boundaries were far more diffuse and complex than the arbitrary demarcations drawn by colonial observers.

Blakebrook Public School falls within the Ngulingah Local Aboriginal Land Council area, within the boundaries of the Bundjalung Nation, specifically speakers of the Widjabul dialect of the Northern Rivers (Sharpe 2011). It has been suggested that Aboriginal people did not usually identify themselves by the name of the language that they spoke because they spoke several languages. In the region, European settlement caused the merging of numerous Aboriginal groups, resulting in the term 'Bundjalung' to replace and identify most local dialect groups. Instead, people identified by their clan within which they lived, in this case, the Widjabul occupied the region in and surrounding Lismore, NSW.

More broadly, Bundjalung traditional lands extended from Grafton and the Clarence River in the south to Beaudesert in the north and as far west as Allora in Queensland and Tenterfield in the New England Tablelands in New South Wales (Sharpe 1985). Wiyabal/Widjabul country extends south from the Tuckean Swamp towards Alstonville in the east and includes Lismore and Goonellabah. Oral evidence indicates the northern boundary includes the Night Cap Ranges, although the extent of the northern and western boundaries is generally disputed (Heron 1995; Collins 2000, p.15; Everick 2018, p.28; Crowley 1978)).

Local Bundjalung origin stories variously tell that Aboriginal people were always here from time immemorial, while others relate that "Three Brothers" – Mamoon, Birrung and Yar-Birrain – came to the land via canoe from the ocean in the time of the Dreaming (Fox and Slabb 2019:91). Each brother's tribe or family spread across the country in a particular direction – Mamoon to the west, Birrung to the south and Yar-Birrain to the north (implying, that they landed on the east coast).

Supporting the oral tradition of many generations of Aboriginal people living in this region is the archaeological evidence. Archaeological evidence shows that Aboriginal communities have initially peopled the south-east coast of Australia by ~40,000 years (Nanson and Young, 1987; Williams et al 2017), and within the NSW north coast/Moreton Bay region for at least 20,000 years (Neal & Stock 1986; NSW Department of Planning 1989:3). At this time, the Pleistocene environment was dry and cold, and the sea level was approximately 110–130 m lower than present and the coastline some 24–32 km east of its present location (Williams et al 2018). The big rivers and estuaries, including the Wilsons River, were freshwater inland waterways running through forests and woodlands on the gradually sloping plains of the continental shelf (Druery & Curedale 1979:17).

The climate eased and sea levels rose between 5,000–8,000 years ago (Sloss et al. 2007; Lewis et al. 2008). Aboriginal occupation sites and resource gathering zones that were on the coast during the Ice Age are presently submerged, and those that are located along the present coastline were originally inland sites. A significant resource gathering zone for local Bundjalung people was the Big Scrub, also known as *Woorbeh* or *Gabul Gabul* (Collins 2000, p.18). The Big Scrub occupied an area of approximately 75,000 ha of rainforest terrain between Lismore, Terania Creek, Mullumbimby, Byron Bay, Broken Head and the Blackwall Range, and provided an abundance of floral and faunal resources including natural medicines (Collins 2000, p.18; Blackmore 1989).

Movement of people occurred throughout the landscape, in order to exploit hunting grounds and marine resources, to escape the winter cold and driving winds, and allow country to regenerate. People created and maintained tracks by burning forest, scrub and mangroves which promoted contact between local tribes and more distant groups, and to facilitate exchange, marriage, initiation and armed conflicts, share news, organise events and discuss law. At the tri-annual gathering of bunya-nut feasting in the Blackall Ranges in south-east Queensland, Aboriginal groups from as far south as Grafton would travel to the ranges to take part in feasting and ceremony. During this time, rites of passage were provided, and particular pathways were used for travelling groups, as the rules regarding trespass were relaxed (Boileau 2007:26).

The Widjabul people maintained several trade routes that connected them with surrounding nation groups. These pathways were most often established along watercourses, ridgelines and mountain ranges and were travelled with relative ease and encompassed Blakebrook. Evidence of these pathways is reflected in the accounts of early European settlers, such as McLeay who describes a route:

to Lismore then out through Modanville to Dunoon. On towards Dorroughby to the present Rocky Creek Dam site towards the Whian Whian State Forest Peats Mountain and on to Night Cap (McLeay, nd, p.20 in Collins 2000, p.48).

4.3 Contact and post contact overview

European settlers began occupying Lismore and surrounds for its rich soils and fertile valleys in the early nineteenth century. At this time, the local Aboriginal population was estimated to be approximately 2,000 people (Collins 2000, p.20; Daley 1973). The arrival of squatters and cedar getters to the upper Richmond River in the 1840s saw much of Widjabul land occupied and, by the 1860s, a vast population of approximately 4,000 European settlers inhabited the Lismore district (Collins 2000, p.20).

During this time, malnutrition, measles, smallpox, and venereal diseases infiltrated the local Aboriginal population causing catastrophic and long-lasting social impacts (Collins 2000, p.20). Small and large-scaled massacres were also prominent during these times, with the closest recorded massacre site located at Angels Beach, South Ballina. Angels Beach was a significant massacre site, that was carried out by native police in 1854 as reprisal for the alleged killing of two European settlers north of the Tweed River. No evidence was available to suggest that the Bundjalung at Angel's beach were involved in the alleged killings; however, Ainsworth estimates that 30 Bundjalung people were killed as a result (Ainsworth 1987, p. 45-46).

Following the introduction of the Robertson Land Act of 1861, large squatting runs were subdivided, making land available for any person (free selectors) to select up to 320 acres on condition of payment of a deposit and agreement to reside on the land for a period of at least three years (NSW Land Registry Service 2020). This resulted in the Widjabul removed from their traditional lands and forced to relocate to a number of campsites, settlements and reserves across the Lismore district.

A number of post-contact Aboriginal camps, reserves and settlements were located across the Lismore District. Early 19th century historical sources refer to a post-contact Aboriginal camp at Blakebrook, stated to be 'near the creek of old Aborigines', most likely Terania Creek (Kass 1995, p.48). Terania Creek was later to become the site of a formalised reserve (gazette no. 2,959) for Aboriginal people from 1875 to 1925 (McGuigan 1983). This reserve was located approximately ~400 m east of Terania Creek in proximity of Kerrong Road which is ~900 m east of the project area (AIATSIS 2018). In 1903, the NSW Aborigines Protection/Welfare Board dedicated 420 acres of land to establish an Aboriginal Reserve known as the 'Dunoon Road Reserve' (Collins 2000, p.20). In 1929, the reserve was converted into an Aboriginal Station and resulted in Aboriginal residents relocating to a nearby campsite in North Lismore or Cabbage Tree Island near Wardell (Bass 1980; Collins 2000, p.21). From the 1930s to 1960s, Cubawee (meaning 'plentiful food') was a self-managed Aboriginal settlement established in response to the objection of stations and reserves by the Bundjalung people (NSW Department of Planning and Environment State Heritage Inventory 2023; Radi 2002 p. 101). Cubawee was run by Frank Roberts and his family and included a schoolhouse and proposed evangelical church (although this never came to fruition). Roberts was known for numerous protests regarding the upkeep of the settlement and protection of its residents. These included campaigns against the NSW Aborigines Protection/Welfare Board's decision to close the school and threaten the removal of Aboriginal children from their parents, the recruiting of Bundjalung people to the 'Aborigines' Progressive Association', an organisation in protest of the NSW Aborigines Protection/Welfare Board, and campaigns to provide necessities to Cubawee in the late 1950s to early 1960s, wherein the settlement lacked sanitation, was becoming overcrowded and buildings were severely run-down (Radi 2022, p.101-102). In 1964, the buildings on Cubawee were demolished in an effort to relocate residents (Radi 2022, p.101-102).

4.4 Information provided by the RAPs

The field investigations provided an opportunity for the RAP to discuss intangible values associated with the project area, such as connection to other cultural places, stories, view-lines, contemporary values, et cetera. These indicated the following:

- Noel King (Widjabul Wia-bal Gurrmbil Aboriginal Corporation) stated that the project area is connected via creek lines to significant women's sites at waterfalls located in nearby national parks, such as Nightcap National Park. Given the connection, it is expected that heritage would be present in the project area.

5 Archaeological context

5.1 Key findings

- NSW has been inhabited by Aboriginal people for over 40,000 years (40 ka). Aboriginal populations were present throughout the terminal Pleistocene/early Holocene, a time of significant environmental change, population growth and reorganisation of territorial boundaries. The majority of Aboriginal sites in the region date to the Holocene period (10 ka to present day); however, there is evidence for sites to date back at least 22,000 years. The earliest evidence of occupation in the Lismore region comes from Seelands rock shelter located along the Clarence River dating to 6.4 ± 0.3 ka.
- A search of the AHIMS database identified 26 Aboriginal sites within 6 km of the project area. These were dominated by isolated finds, low-density artefact site, and ceremonial and/or Dreaming sites. No AHIMS sites are located within the project area, with the nearest being >2.2 km away and the majority fringing with Leycester Creek and across the North Lismore Plateau.
- No Aboriginal heritage impact permits (AHIPs) have been issued in the Blakebrook region.
- Regional information, environmental characteristics and previous land use of the project area, indicate low potential for substantial cultural material to be present within the project area. Moderate levels of disturbance have occurred within the project area from the 19th century which reduces the potential for any surface or sub-surface material to be present, or in situ.

5.2 Regional context

The first peopling of Australia occurred approximately 50,000 years ago (50 ka), and likely consisted of reasonably large groups of technologically advanced hunter-gatherers (Bradshaw et al. 2019, O'Connell et al. 2018). The peopling of the continent was rapid, with sites such as Devil's Lair (WA), Warraty (SA), and Lake Mungo (NSW) all occupied within a few thousand years of arrival (Bowler et al. 2003, Hamm et al. 2016, Turney et al. 2001).

Genomic research has shown that following these initial explorations of the continent, regional populations or nomadic sedentism, was established by ~40 ka (Tobler et al. 2017). These small populations were highly mobile, but remained within a broad spatial geographic area, dictated in general by the nature of resources and water availability. In the case of some of the arid parts of the continent, mobility encompassed thousands of square kilometres (Gould 1977), while major riverine corridors had near permanent settlements (Pardoe 1995).

In NSW, the earliest evidence of Aboriginal people are human remains recovered from the lunette in Lake Mungo and dating to ~42 ka (Bowler et al. 2003, O'Connell et al. 2018). The presence of red ochre covering the remains represents a society with significant cultural and symbolic complexity (Langley et al. 2011). Near the coastal edge, the earliest populations were found at Cranebrook Terrace, near Penrith (western Sydney). Here, a handful of rudimentary stone tools were found in an alluvial unit, some 8 m below the current surface, and which were dated to ~40–45 ka (Williams et al. 2017). However, it is not until ~35 ka, that regional populations appear to have become established in the Sydney Basin, and which appeared to consist of small bands of people focussed mainly along major river systems, including the Hawkesbury-Nepean River, Georges River, and Hunter River (AAJV 2020, Hughes et al. 2014, Williams et al. 2012, 2014). These rivers formed key ecological refuges that hunter-gatherer groups used to survive major climatic events such as the Last Glacial Maximum (21 ± 3 ka) – a cool and arid climatic period. Well-established archaeological models suggest populations experienced a major reduction in size (by as much as 60%), and settlement contraction and abandonment across much of the continent during this time (Veth 1993, Williams 2013), although recent research suggests that the story may be more complex than this (e.g. Tobler et al. 2017).

The terminal Pleistocene and early Holocene (~18–8 ka) was characterised by significant environmental change, notably the rapid inundation of much of the coastal shelf, resulting in the reduction of the continent by ~21% (~2 million km²) (Williams et al. 2018), in tandem with improving climatic conditions – the Holocene climatic optimum (Williams et al. 2015a, Williams et al. 2015b). More broadly, these conditions resulted in increasing population growth, expansion of ranging territories, increasing sedentism (longer patch residence time) and the beginnings of low-level food production (e.g. aquaculture), and ultimately the initiation of social and cultural groupings observed in the late Holocene (Williams et al. 2015b). We see a much broader range of archaeological site types occurring, such as the Roonka Flat burial ground on the banks of the Murray River within which some 147 individuals were interred through the Holocene (Pate 1998), and the increasing use of marine resources.

Many of the previous refuges were subject to abandonment or a re-structuring of land use (Dortch 1979; Fitzsimmons et al. 2019). These activities suggest the ability to undertake large-scale movements to mitigate environmental distress was becoming increasingly difficult and was addressed through diversification of hunter-gathering behaviours and, at least in part, technological advances, and investment (Williams et al. 2015b).

The late Holocene saw significant population increase, with hunter-gatherers reaching their zenith of ~1.2 million at 0.5 ka, a tenfold increase on Pleistocene levels (Williams 2013). Data suggests that the highest populations during this time were in the south-east of Australia. Williams et al. (2015b) suggest that this increase was likely a result of intensification of earlier technological advancements, including hafting-technology, plant and seed processing, and localized landscape management (using fire), allowing climatic downturns to be successfully weathered. These included strong arid El Nino Southern Oscillation (ENSO) conditions between 4–2 ka, and increasingly turbulent climatic conditions during the Medieval Climatic Anomaly (1.3–1 ka) (generally wetter) and Little Ice Age (0.3–0.5 ka) (generally drier) (Williams et al. 2015b). A result of these denser populations was the decreased freedom of movement and the formation of strong classificatory kinship systems, complex cultural and symbolic landscapes based on geographic totemism (the 'Dreaming'), distinctive graphic art systems, land rights in the form of ritual property, and formalized exchange networks (Williams et al. 2015b).

For the northern NSW coastline, these conditions resulted in a significant increase in the archaeological visibility of past Aboriginal populations, with sites occurring in a much wider range of locations and generally indicative of a more intensive use of the landscape. The majority of dated sites in the Northern Rivers region fall within this time period, including midden sites at North and Chickiba Creeks (Bailey 1975), Sextons Hill (Appleton 1993:17-18) and at South Ballina and Broadwater (McBryde 1982:77). One of the earliest sites recorded in the Lismore area is the Seelands rock shelter (6.4±0.3 ka) located on the Clarence River (McBryde 1974).

5.3 Local archaeological context

Evidence of Aboriginal occupation in the local area extends back at least 22,000 years, evidenced through expansive archaeological research conducted in north-eastern NSW and south-eastern Queensland since the late 20th century (Heron and Faulkner, 1998, p.7; Bailey 1975; Morris 1976; Creamer 1979; McBryde 1982). In context of the project area, the Northern Rivers region contains a significant concentration of registered mythological sites, including ceremonial grounds and stone arrangements (Collins, 1992; Heron and Faulkner, 1998).

A large investigation undertaken in the Northern Rivers region across the Orara River catchment occurred as part of the preparation for an 82 km transmission line which identified 50 sites including 39 artefact scatters, 4 culturally modified trees, 4 rock shelters with 3 containing Aboriginal art, and 3 quarry sites. The quarry sites recorded are noted to have utilised silcrete sources from bedrock conglomerate exposures (Navin and Officer 1990).

The following sections provide a summary of other nearby investigations and assessments that provide an indication of the cultural materials found within the general region (Figure 5.1).

5.3.1 Previous studies

i Blakebrook Quarry – Aboriginal heritage impact assessment (ERM 2008)

In 2008, ERM prepared an Aboriginal Heritage Impact Assessment for a proposed eastern expansion of Blakebrook Quarry at 540 Nimbin Road, Blakebrook (Lot 102 DP 817730 and Lot 1 DP 845473), located 1.8 km west of the project area.

A broad range of site types were noted as being present within the wider region and the predictive model suggested there was moderate potential of encountering scatter sites and culturally modified trees within the region, with lower potential for other cultural site types, such as middens, habitation structures ceremonial or ritual sites and burials to occur. Largely on the basis of a survey, the assessment found there was ‘very little possibility’ of Aboriginal objects or sites occurring within the study area due to past modification of the landscape.

ii Lismore Base Hospital – Heritage Assessment (City Plan Heritage 2013)

A Heritage Assessment and Impact Statement was prepared by City Plan Heritage (CPH) in 2013 for the new Lismore Base Hospital at 60 Uralba St, Lismore located 7.7 km south-east from the project area. Lismore City Council publications suggests ritual and ceremonial sites are actually comparatively well-distributed throughout the region surrounding the subject site - including the location of the above ERM assessment – with several ceremonial sites being present including ritual sites at Wilson Park, Lismore, and another in North Lismore on the stone quarry hill (CPH 2013:20).

In predicting the likelihood of Aboriginal site occurrence, CPH found that while the immediate study area of the hospital site held low potential, the region had a rich record of Aboriginal occupation, with site frequency associated with waterways, ridgelines and proximity to marine and terrestrial resources. Site occurrence and archaeological potential was likely to be affected by land disturbance regardless of the setting.

iii Lismore to Mullumbimby 132KV Transmission Lines – Survey (Byrne 1996)

A field survey was undertaken by Denis Byrne in 1996 in Dunoon for the Lismore to Mullumbimby 132 KV Transmission Lines project, located 5 km west of the project area. During the survey of a banana plantation in close proximity to Borton Road, an artefact scatter with four flaked pieces of various materials such as quartzite, silcrete, volcanic stone and siliceous stone was recorded (‘BortonRd1’ AHIMS #04-2-0094 and #04-4-0088). It is believed the AHIMS system has duplicated this AHIMS site with two different AHIMS numbers (AHIMS#04-2-0094 and #04-4-0088).

The artefact scatter was located within a disturbed krasnozem soil landscape with no indication of a subsurface archaeological deposit. Disturbance of the rainforest landscape is suggested to have occurred during landscape clearance in preparation for crop on the land.

iv Integrated Aboriginal and Non-Aboriginal Cultural and Archaeological Heritage Assessment, North Lismore Plateau (Remnant Archaeology 2015)

In 2015, Remnant Archaeology undertook test excavations as part of their Integrated Aboriginal and Non-Aboriginal Cultural and Archaeological Heritage assessment of the North Lismore Plateau study. A total of seven artefacts were recovered during the test excavations of 39 test pits. Two artefacts (NLPI-05’ AHIMS #04-4-0216) were located within the same test pit on a private property towards the western side of the North Lismore Plateau (boundary of Lot 22DP1214953 and Lot 2 DP1214953). The landscape had previously undergone land clearance and used for cattle grazing. The two artefacts consisted of a chert flake and silcrete debitage which were located at 14 cm depth on a gentle slope landform within the Frederick soil landscape 500 m from a permanent water source.

An artefact scatter ('NLPI-06' AHIMS #04-4-0218) including silcrete retouched flake, silcrete debitage and chalcedony debitage was recovered during test excavations. It is noted that historical artefacts were uncovered in association with this site.

AHIMS site NLPL-07 (#04-4-0219) was recorded as an isolated find detailing a petrified wood single platform core or assayed piece which has only two rough strikes.

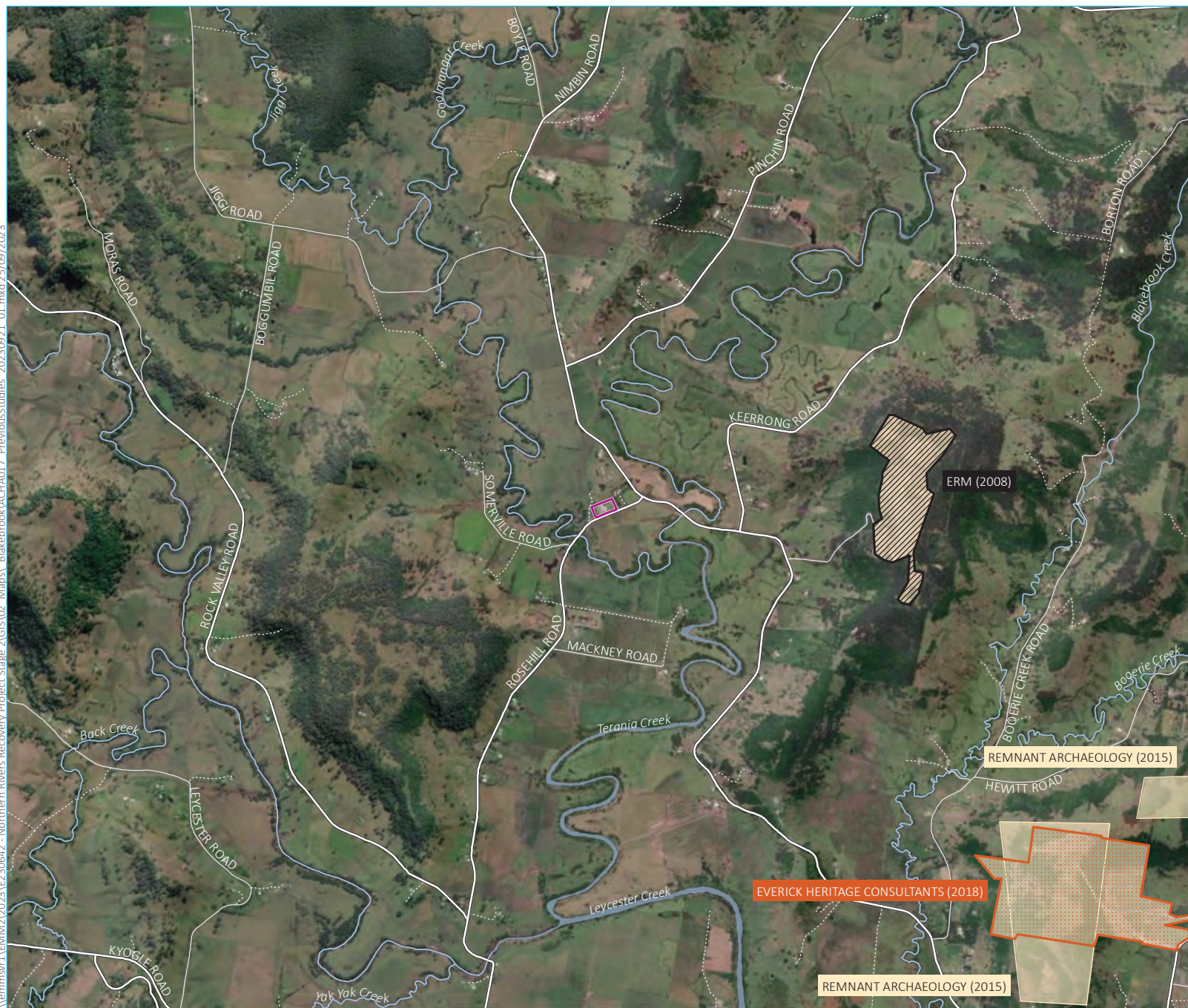
An isolated find ('NLPI-08' AHIMS #04-4-0227) was registered as part of this study located ~700 north from NLPI-05. The artefact was recovered on the sieve and described as a banded chalcedony (agate) flaked piece.

v [Cultural Heritage Assessment, North Lismore Plateau \(Everick Heritage Consultants 2018\)](#)

A Cultural Heritage Assessment was completed in 2018 by Everick Heritage Consultants for a residential development proposal across a portion of the North Lismore Plateau, located 3.7 km south-east of the project area. The 'Lismore Plateau Stone Arrangement' (AHIMS # 04-4-0249) site located across the North Lismore Plateau, which was registered on AHIMS in 2016, is noted by Everick as of historical origin following a site inspection and historical aerials which suggests construction by locals or council to establish property boundaries and for livestock.

Other than observing three artefact sites that were previously registered, no Aboriginal sites were identified during Everick's assessment.

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- KEY**
- Site boundary
 - Previous archaeological studies
 - ERM (2008)
 - Everick Heritage Consultants (2018)
 - Remnant Archaeology (2015)
 - Existing environment
 - Major road
 - Minor road
 - Vehicular track
 - Named watercourse
 - Named waterbody
 - Footprint

Previous archaeological studies

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 5.1

5.4 AHIMS data

The Aboriginal Heritage Information Management System (AHIMS) database is managed by Heritage NSW and includes a location and description of Aboriginal objects and sites recorded through academic research and cultural resource management. EMM conducted a search of the AHIMS database on 8 June 2023. The search identifies any Aboriginal sites or places registered within the project area and aids predictions for the project area showing the frequency and distribution of Aboriginal site types in the broader landscape. A copy of the AHIMS search results is provided in Table 5.1.

The AHIMS search results identified 26 Aboriginal sites and 1 Aboriginal place within a 6 km search area centred on the project area (Table 5.1, Figure 5.2). One known site within the search area appears to have been duplicated (# 04-2-0094 as a duplicate of #04-4-0088). This duplicate will be treated as a single site. As such, the following discussion relates to 25 AHIMS sites recorded within the search area.

The most commonly recorded site type in the area are stone artefact sites (n=14, ~56%) that includes either artefact scatters, isolated finds or undefined stone artefact sites. Many of these registered stone artefact sites do not specify the number of artefacts associated with the site (hence “undefined”) although inference from site names and site cards enables identification of some. Aboriginal ceremony and dreaming sites are the second most common site type in the region (n=3, ~12%). Other sites represented across the landscape that were identified include habitation structures (one associated with a potential archaeological deposit [PAD] site), a stone arrangement site and culturally modified trees. The ‘Lismore Plateau Stone Arrangement’ site (AHIMS #04-4-0249) has since been reinspected and updated as ‘not a site’ after noted to be of historical origin in a recent study (Section 5.3.1v). Another site type located within the area includes a ceremonial ring site, ‘Tuncester’ (AHIMS #04-4-0007), located at Tuncester along Terania Creek, 2.3 km south from project area.

An Aboriginal Place known as ‘Cubawee’ is located 4.2 km south-west of the project area at Tuncester. From the 1930s to 1960s, Cubawee was a self-managed Aboriginal settlement (NSW Department of Planning and Environment State Heritage Inventory 2023).

Spatially, the documentation of Aboriginal sites appears to be largely influenced by the location of compliance-based archaeological investigation, associated with infrastructure developments predominantly west of the project area, for example, work along the North Lismore Plateau which highlights a primary concentration of registered stone artefact sites in the area. While some archaeological and human ecological factors like proximity to water also play a role, the AHIMS search results appear to be largely biased towards the location of modern assessments. A second observational pattern is the location of other sites identified, such as habitation structures and ceremonial and/or dreaming sites, are primarily located in close proximity to tributaries of Leycester Creek, a permanent water source in the area.

No previously recorded Aboriginal objects or sites were identified in the project area.

Four restricted sites (n=4, ~16%) have been identified within the AHIMS search area and have since been confirmed to not occur within the project area.

Table 5.1 AHIMS search results

AHIMS site type	Number	Percentage
Ceremonial and/or dreaming site	3	12
Isolated Aboriginal object	8	32
Undefined artefactual site	6	24
Modified Tree (carved or scarred)	2	8
Stone Arrangement	1	4
Habitation structure	1	4
Habitation structure; PAD	1	4
Restricted	4	16
Total	25	100.00

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KEY

Site boundary

Existing environment

Major road

Minor road

Named watercourse

Named waterbody

AHIMS (by site type)

Aboriginal ceremony and dreaming

Ceremonial Ring

Habitation structure

Habitation structure with PAD

Isolated find

Modified tree

Stone arrangement

Undefined artefact site

Previously documented
Aboriginal sites

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 5.2



Source: EMM (2023); DFSI (2017, 2020); Metromap (2023); OEH (2023)

0 0.5 1 km
GDA2020 MGA Zone 56

5.5 Predictive model

A predictive model of Aboriginal site locations has been devised based on the data presented in the preceding sections. In summary, the model has been formed by an analysis of:

- landscape features in the project area and surrounds (Section 3)
- pre-colonial period ecological conditions (Section 3 and 5)
- ethno-historical information about Aboriginal life and material (Section 4)
- the type and distribution of Aboriginal sites described in previous reports and AHIMS data (Section 5).

The model enabled predictions to be made about the location of Aboriginal sites within the project area and this information guided the archaeological survey effort performed as part of this ACHA. The following general predictions can be made regarding the nature of sites and their location in the current project area:

- The most common site type in and around the project area are surface and/or subsurface stone artefactual material representative of past visitation of the surrounding area. Available data indicates stone artefactual material is present at low densities across the surrounding landscape.
- Sites such as habitation structures, ceremonial and/or dreaming sites and culturally modified trees are not expected to occur within the project area. There is limited potential for culturally modified trees to be present, based on vegetation clearance activities.
- Archaeological evidence tends to indicate a higher concentration of Aboriginal occupation in proximity to creek lines, sites frequently present along Leycester Creek.
- Spatial data appears to be largely biased towards the location of modern assessments and is not an accurate assessment of the landscape. Assessments and investigations of the North Lismore Plateau account for the majority of registered sites in proximity to the project area.
- Transitory use of the project area by Aboriginal people in the past is considered likely with ephemeral movement and long-term occupation based on habitation structures, located 4 km south-west of the project area, and ceremony and dreaming sites across the landscape, one located 2.5 km south-west of the project area, both along Leycester Creek.

Based on the information above, it is considered that where deep disturbance has been limited, there is potential for subsurface cultural materials to be present within the project area in the form of surface and/or subsurface stone artefacts at low densities.

6 Field investigation

6.1 Key findings

- An archaeological field survey was undertaken on 14 August 2023. This investigation identified that no cultural materials were observed, and no natural soil profiles or surfaces were evident across the western half of the project area. Vegetation present on site appeared recent, except for a row of mature camphor laurel trees that are non-native species on the western and northern boundary, and no cultural modifications were noted or considered probable.
- An archaeological test excavation was undertaken between 14 to 16 August 2023 focussing on one area in the western half of the project area (the remaining area being outside of proposed development activity). Test excavation consisted of seven test pits (0.25–1 m²) on a 20 m grid in the north-west and south-west of the project area. The south-west revealed areas of fill to depths of ~30 cm, with geotechnical investigations further outlining depths extending to ~1 m depth. However, areas in the north-west revealed natural soil deposits located below introduced modern topsoil. Excavation extended to depths of 1 m below the current surface, nearly reaching the interface of the A1 and B2 horizon of the Leicester soil landscape.
- One stone artefact was recovered from the test excavation, which was found along the northern boundary of the site within TP 2, at 55 cm below the current surface. The artefact was assessed as a small pink and grey medium grained silcrete core and was tentatively considered of late Holocene (<5 ka) age based on typology and raw material.

6.2 Archaeological survey

6.2.1 Approach and methods

The survey was undertaken on 14 August 2023 before beginning the archaeological test excavation program, and aimed to achieve the following:

- Identify landforms that may have higher potential to contain burial Aboriginal cultural deposits.
- Identify evidence of previous disturbance that may have resulted in partial or complete removal of Aboriginal objects that may have been present.
- Identify and record any previously recorded or newly identified surface Aboriginal objects or sites present in the project area, as well as any cultural values that are associated with the site.

The focus of the archaeological field survey was to investigate soil exposures for extant Aboriginal objects and identify landforms that have potential for cultural material to be present (either in surface or subsurface deposits). All Aboriginal objects and/or landforms of interest were mapped and documented using hand-held GPS, photographs, sketches and/or written descriptions.

Where possible, a significant focus of the survey will be to discuss intangible values associated with the project area, such as connection to other cultural places, stories, view-lines, contemporary values, et cetera.

The archaeological field survey was undertaken in accordance with Requirements 5 to 10 of the Code of Practice (DECCW 2010). In summary, the Code of Practice requires the following general methodology:

- Pedestrian survey of the project area.
- Recording of beginning and end points of transects or the boundaries of survey units, and the spacing between survey personnel.
- Recording of landform, soil information, land surface, vegetation conditions, visibility and exposure, and survey coverage.
- Recording of any identified Aboriginal sites according to Requirements 6-8, and recording of any identified Aboriginal objects in accordance with Requirements 18-24 of the Code of Practice. This would include the spatial location, photographs and sketches, and written description of any identified sites, such as culturally modified trees, artefact sites, et cetera.
- If any Aboriginal objects and/or sites are identified in the course of the survey, site cards will be completed and submitted to the AHIMS registrar.
- In the event of Aboriginal heritage being identified within the project footprint, discussions would be held on site to understand whether further investigation and/or management of these finds is warranted. Where sites are considered of high archaeological and/or cultural value, further characterisation, consideration of avoidance and re-design would be explored with the registered Aboriginal parties. Appropriate mitigation measures would be developed in consultation with the Registered Aboriginal Parties and Heritage NSW for any potential unavoidable impacts.

The pedestrian survey was undertaken by EMM Archaeologists Mikhaila Chaplin, Cameron Neal, Nicholas Reilly and Phillipa O'Brien, with Noel King and Chris Brown Jnr representing Widjabul Wia-bal Gurrmbil Aboriginal Corporation. Participants were spaced 2–5 m apart and the team targeted ground exposure along transects. It must be noted, however, that archaeological surveys are inherently limited by ground surface visibility conditions and, therefore, any survey, despite the intensity of survey effort and spacing of survey transects, is considered to only *sample* the archaeological landscape.

The effectiveness of the survey is determined through recording and analysing survey coverage data. It is evaluated for its effectiveness in identifying the distribution of Aboriginal objects across the landscape, taking into account the potential for archaeological deposits. The percentage of the ground surface exposed in each landform and the visible ground surface within exposures (as ground exposures are often obscured by vegetation, gravels, etc.) influences the survey results. For example, an archaeologically sensitive landform surface that is highly exposed by erosion is likely to reveal Aboriginal objects, whereas a similar landform that is thickly grassed will obscure surface artefacts if they are present. Overall, calculation of effective survey coverage is used to estimate not only how much area was physically surveyed, but also how favourable the survey conditions were for the identification of Aboriginal sites.

Site recording was completed in accordance with the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010a). Survey transects were recorded as tracks on GPS units and detailed information about each transect recorded in field notebooks.

Table 6.1 Aboriginal representatives involved in the survey and test excavation

Organisation	Representative
Widjabul Wia-bal Gurrmbil Aboriginal Corporation	Noel King
	Chris Brown Jnr

6.2.2 Results

The archaeological field survey included one survey unit (SU) across the western half of the Blakebrook Public School site targeting the location of the proposed development footprint (Figure 6.1). The project area is relatively flat, gently sloping to the south. The transects extended 80 m in length. Overall, the ground surface exposure was generally poor with average visibility of 30%, and an effective coverage of 30% (Table 6.2).

The survey unit was undertaken in an open area between the western boundary of the project area to the edge of the school building to the east. No buildings were located in the western half of the school grounds, encompassing an area of approximately 3,730 m². The area was characterised by a playground area in the north-west corner (Plate 6.2), large mature trees along the western and northern boundaries, a storage shed along the western boundary, manicured grassed areas, two large water tanks and a service pit to the east (Plate 6.3), and a low wired metal fence on an east to west alignment across the centre of the site. The southern half of the fence line was recently used as a staff carpark, with the vehicle entrance on Rosehill Road along the southern boundary, and an open playing area for the students in the northern half. School buildings line the eastern edge of the survey unit area.

This area of the survey unit appears to have been exposed moderate levels of ground disturbance in areas where previous landscaping, ground preparation and service installation has occurred. Visibility of these areas was very poor due to the presence of manicured grass and gardens. Small areas of exposure were visible due to erosion scalds on the western and northern edge of the site, at the base of mature trees and due to vehicular movement across site (Plate 6.2). Red-brown loamy sand topsoil deposits were observed here. Given the context of this site, it is likely this partially imported landscaping fill. Outside of this area, visibility was extremely low (<30%), with the survey area covered in areas of lawn and a hardstand playground surface.

No Aboriginal objects were observed during the pedestrian survey. No trees were observed exhibiting cultural modifications.

Table 6.2 Survey coverage

Survey unit	Landform	Length (m)	Survey unit area (m ²)	Visibility (%)	Exposure (%)	Effective Coverage (m ²) (= survey unit area x visibility % x exposure %)	Effective Coverage (%) (effective coverage area/survey unit area x 100)	Aboriginal sites identified
SU 1	Gentle slope	160	3,730	30	10	1,119	30	0



Plate 6.1 View south of the western half of the school from TP2



Plate 6.2 View north of the northern boundary with mature trees and playground boundary present



Plate 6.3 View east towards school structures, water tank, service pit and low fence from the centre of the western half of the site



Plate 6.4 View east of the school structure along the southern boundary of the site



Plate 6.5 View north-west of surrounding landscape from the northern boundary of the project area



Plate 6.6 View north of surrounding landscape from the northern boundary of the project area

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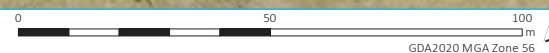
- KEY
- Site boundary
 - Survey transect
 - Existing environment
 - Major road
 - Vehicular track

Survey transects

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 6.1



Source: EMM (2023); DFSI (2017, 2020); Metromap (2023)



6.3 Text excavations

6.3.1 Approach and methods

The findings of the geotechnical investigations on site indicated that there was potential for deeply buried soil profiles of archaeological interest to be present within the project area. The project area has a history of previous disturbance on site relating to its use as a school. It was unclear how much of the Aboriginal landscape would be present and whether such activities disturbed the natural soil profile. Given this uncertainty, an archaeological test excavation was proposed to investigate the project area, allow characterisation of the soil profile, and determine whether materials are present.

These works were undertaken in accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010) and consisted of small manually dug test pits in a grid across the project area. The excavation was directed by Mikhaila Chaplin and Cameron Neal (EMM archaeologists), with the archaeological team consisting of Nicholas Reilly and Phillipa O'Brien-Pounde (EMM archaeologists). The Widjabul Wia-bal Gurrmbil Aboriginal Corporation, as the Registered Native Title Body Corporate (RNTBC), were represented during test excavation as listed in Table 6.3.

The primary aims of excavations were as follows:

- Identify, map and characterise the nature, age, extent, integrity and significance of any Aboriginal cultural material within the impact area.
- Better assess the significance and historical meaning of any cultural materials that exist within the project area so that any future archaeological investigation can advance our understanding of past Aboriginal cultural behaviour and environmental adaptation.
- Direct future heritage activities and mitigation measures (if required) for the project area.

The due diligence assessment undertaken by EMM in 2022 identified the project area as retaining some archaeological potential due to low levels of previous disturbance. The proposed works at Blakebrook Public School were identified as being subject to the western half of the project area (Section 1.2) and, therefore, identified as requiring further investigation. To achieve the aims above, fourteen 0.25–1 m² were proposed across the western half of the site, with spacing generally 20 m apart. Some minor relocation and movement of the test pits in this grid was required to avoid known services and hard stand areas.

In summary, the following methods were adopted for the excavation:

- All test excavation pits were spatially located using a differential GPS device.
- Manual excavation of 0.25 m² (50 x 50 cm) test pits in a systematic grid across areas of archaeological interest within the impact footprint. The spatial resolution of the grid would be dependent on on-ground conditions but would typically have test pits between 20 m apart, with high resolution in areas of identified cultural materials and/or high potential, with lower resolution in areas of moderate potential. Additional in-filling of this initial grid of test pits and/or the expansion of test pits (up to 3 m²) may be undertaken to further resolve any uncertainties about the cultural deposits or where deep deposits are encountered.
- Excavation would use hand tools. Excavation of the first unit would be in 5 cm spits, with subsequent excavation allowed in 10 cm spits or according to stratigraphy (whichever is smallest) depending on the results of the first unit. Manual excavation would continue to either: i) the base of the cultural deposits; ii) to the depth of the underlying geology; or iii) to the maximum depth possible via hand excavation.
- Wet sieving of all manually excavated material through a 5 mm sieve.

- Soil profiles were recorded in accordance with the Code of Practice, including scaled drawings, photographs, and written descriptions.
- Soil samples were collected for description, sedimentological and chronological analysis where such analysis was considered likely to contribute significant information.

Table 6.3 **Aboriginal representatives involved in the test excavation**

Organisation	Representative
Widjabul Wia-bal Gurrmbil Aboriginal Corporation	Noel King
	Chris Brown Jnr

6.3.2 Results

Seven test pits within the site were excavated in the course of the program, and recovered one Aboriginal object (Table 6.4, Figure 6.2, Appendix D.4). Test pits averaged depths of ~30 cm, with TP2 extending up to 100 cm below the surface. A total of seven test pits were excavated (2.5 m²) from which 1.19 m³ of sediment was recovered and dry sieved through a 5 mm mesh. Fourteen test pits were originally planned to be excavated within the project area, although due to hardstand surfaces, mature trees, proposed project footprint, and service lines, TP1, TP4, TP7, TP8, TP12, TP13, TP14 were not excavated. Of the seven test pits that were excavated, one (14%) contained an artefact (Figure 6.2, Appendix D.4).

The archaeological test excavation revealed that the site is located on an alluvial Leicester soil landscape, which is present at an average depth of ~30 cm below ground surface across TP 2 and TP 3. The depth of introduced fill or modern construction deposits across primarily the southern half of the area was excavated to a maximum depth of ~30 cm below ground surface until stopping due as geotechnical investigations revealed fill deposits extending to over ~1 m depth. These findings suggest the southern portion of the western half of the site was exposed to historical activities relating to the 20th century, such as installation and removal of any previous buildings and/or ancillary structures, services, cess pits, landscaping, construction utilities area and levelling across this portion of the project area.

Generally, the soil profile observed across the project area consisted of the following units (Plate 6.3 to Plate 6.7):

1. Modern sandy loam topsoil: a loose brown organic sand with frequent root materials and some twentieth century debris, including glass and plastic. This was interpreted as being 20th century introduced topsoil. A loose sandy lense was present across northern section of TP 2 representing another topsoil fill material used on site.
2. Introduced fill: a light brown moderate clay fill with small sub-angular gravel inclusions. This was interpreted as an introduced modern construction fill deposit later used for levelling purposes.
3. Leicester soil landscape consisting of:
 - a) Brown sandy clay loam (A1 horizon): a moderately compacted sandy clay loam with pockets of small (<3 cm) white and yellow sand inclusions. This was identified as the remnants of the pre-European topsoil, grading to
 - b) Dark reddish brown clay loam (A1 horizon): a dark reddish brown light clay loam, with fine roots. This unit reflects a well-established undisturbed soil profile which had a gradual boundary of clay increasing with depth. TP 3 included ironstone inclusions.

4. Leicester alluvial subsoils (B2 horizon): an indurated dark reddish brown mottled cracking clay, and which was considered to be culturally sterile.

Excavation of TP 2 in the north-western corner of the site revealed minimal disturbance and included modern sandy loam topsoil deposits (1) which were identified as shallow (~20 cm) on top of brown sandy clay loam (3a), transitioning to dark reddish brown clay loam (3b) with underlying undisturbed alluvial subsoils (4). One test pit - TP 3 – located within an existing school structure, was relocated ~10 m north and revealed similar soil profile to TP 2 except for addition inclusions in dark reddish brown clay loam (3b) of glass inclusions up to 40 cm depth and ironstone inclusions.

Test pits excavated south of TP 2 and in the south-west of the project area included a modern sandy loam topsoil (1) above a light brown clay fill with gravel and glass inclusions (2) which was exposed in TP 5, 6, 10 and 11. These test pits did not encounter natural and/or unmodified deposits within the depth of excavation (~30 cm below ground surface). Excavation was not continued within test pits that encountered the introduced fill (2) as the geotechnical investigations undertaken in 2023 by Tetra Coffey revealed the introduced fill in this area of the site extends to over ~1 m depth with underlying alluvial subsoil deposits.

One stone artefact, an isolated silcrete core (NRBL IF1 – AHIMS X-XX-XXXX), was recovered from TP2 during test excavations at 55 cm below ground surface within 3b (Appendix D.4). The raw material observed is silcrete, a not local raw material that has been found in quarry sites regionally, such as the Orara River silcrete quarry site located 140 km south of the project area (Navin and Officer 1990). Silcrete sources have also been recorded as potentially being located at Tintenbar and Lennox Head, located 35 km west of the project area (Collins, 1996). Of the seven test pits excavated across the site, with an overall excavated area of 2.5 m², there was an overall artefact density of 0.4/m².

The lithic analysis report completed by Laressa Barry, EMM senior archaeologist, states that the absence of other debitage or “waste” material produced from the working of this core suggests that core reduction activities appear not to have been occurring in this location. The stone artefact suggests that the project area was, at least, sporadically utilised, representing transitory use of the landscape which likely reflects an isolated loss or random discard event (Appendix D.4). It also implies that heavy core reduction was taking place in the region.

Table 6.4 **Summary of the test excavation.**

Test Pit #	Easting (GDA94M GAz56)	Northing (GDA94M GAz56)	Location within project area	Area of excavation (m ²)	Depth excavated (cm)	Current ground surface (m AHD)	Depth of overlying fill from surface (cm)	Number of artefacts (n)	Artefacts per m ² (n)
TP1	Not excavated – Playground area								
TP2	522427	6818219	North-west corner	1	100	15.45	15	1	
TP3	522465	6818233	North centre	0.25	80	15.29	15	0	
TP 4	Not excavated– Mature tree roots and structure present								
TP 5	522416	6818193	North-west corner	0.25	10	14.82	NA	0	
TP 6	522435	6818200	North-west corner	0.25	10	15.07	NA	0	
TP 7	Not excavated – Requested by client as not within proposed works area								

Table 6.4 **Summary of the test excavation.**

Test Pit #	Easting (GDA94M GAz56)	Northing (GDA94M GAz56)	Location within project area	Area of excavation (m ²)	Depth excavated (cm)	Current ground surface (m AHD)	Depth of overlying fill from surface (cm)	Number of artefacts (n)	Artefacts per m ² (n)
TP 8	Not excavated – Requested by client as not within proposed works area								
TP 9	522423	6818174	South-west corner	0.25	18	14.53	NA	0	
TP 10	522442	6818181	South-west corner	0.25	3	14.97	NA	0	
TP 11	522431	6818155	South-west corner	0.25	12	14.43	NA	0	
TP 12	Not excavated - Services								
TP 13	Not excavated - Services								
TP 14	Not excavated - Services								
Average	-	-	-	0.35	31.8	-	15	-	0.4
Total	-	-	-	2.5	-	-	-	1	-



Plate 6.4 **Test pit 2, looking north. A natural soil profile is observable below the pale yellow fill unit, with cultural materials encountered some 50 cm below the current surface**



Plate 6.5 Test pit 2, looking west. A natural soil profile is observable below the pale brown fill unit, with cultural materials encountered some 50 cm below the current surface



Plate 6.6 Test pit 3, looking north. A natural soil profile is observable below the brown fill unit.

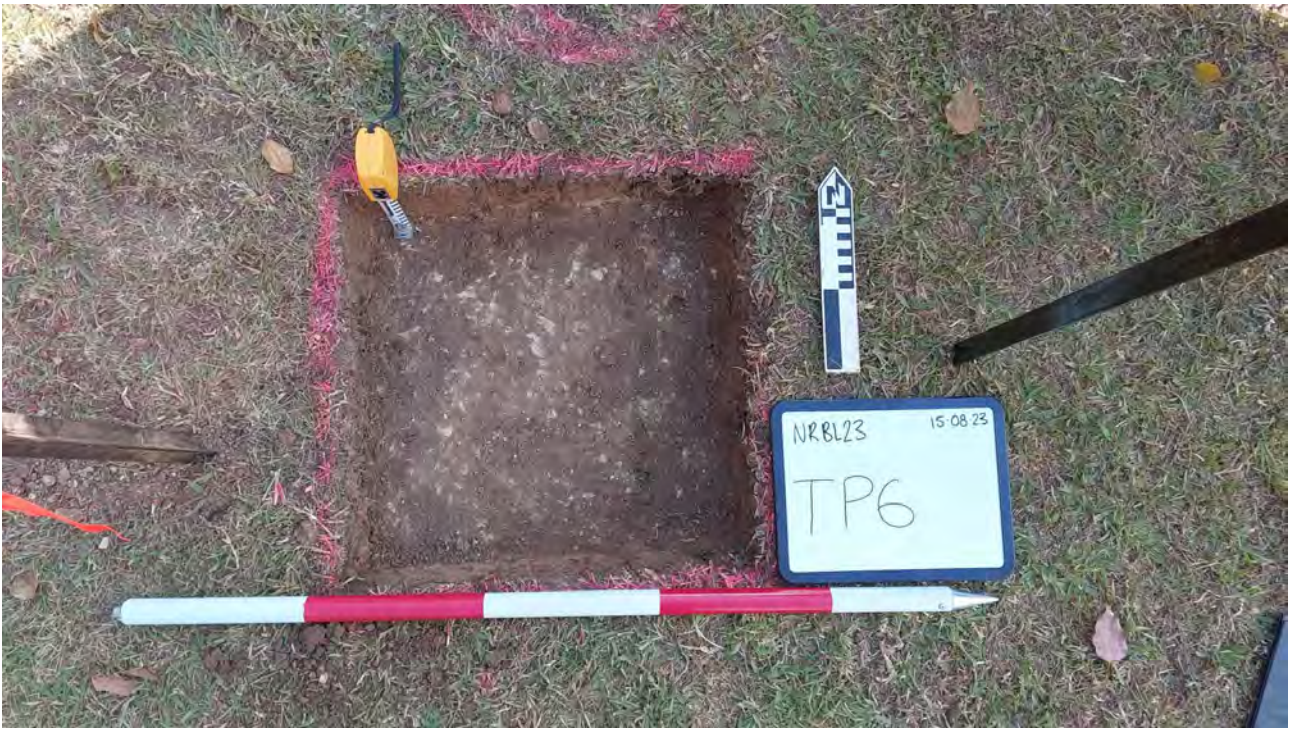


Plate 6.7 Test pit 6, facing north. Clay fill material is observable below a topsoil unit.

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- KEY
- Site boundary
 - Project design
 - Test pit artefact density (count)
 - 0 (no artefacts found)
 - 1
 - Not excavated
 - Existing environment
 - Major road
 - Vehicular track

Test excavation results

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 6.2



Source: EMM (2023); DFSI (2017, 2020); Metromap (2023)



7 The archaeological resource

Past archaeological studies and previously documented Aboriginal heritage in the region show that material culture within the regional context is generally dominated by artefactual sites, commonly isolated objects and low density (<10) occurrences. Archaeological studies have documented stone artefacts in surface and sub-surface contexts across the North Lismore Plateau, and during surveys in disturbed contexts in the region. These cultural materials indicate the use of transitory use of the landscape between water sources in the region surrounding the project area.

Other site types such as habitation structures, culturally modified trees and ceremonial and natural places of cultural importance are commonly found located in close proximity to permanent water sources in the surrounding landscape. These cultural materials indicate use of water sources in the vicinity, such as Terania Creek, Goolmangar Creek and Leycester Creek, tributaries of Wilsons River, by Aboriginal people. Culturally modified trees are generally only found in areas where remnant vegetation has survived in the region. Neither of these site types are relevant to the project area based on field investigations with the local Aboriginal community.

Spatially, a pattern of distribution for the region is largely influenced by the results from archaeological reports in response to development and associated cultural heritage assessments. A large number of sites appear to be documented across the North Lismore Plateau as this locality has been a focus of potential development and associated cultural heritage management investigations. Although AHIMS results appear to indicate the use of nearby tributaries of the Wilson River and transitory movement across the landscape evident at the North Lismore Plateau, it is probable that the spatial patterning is incomplete.

Past land use and historical activities across the site, including pastoral activities, establishment of the school in the early 20th century and later upgrades, have resulted in moderate disturbance to the topsoil deposits across the project area. Structural impacts have occurred predominantly in the centre of the project area and levelling activities in the eastern half of the project area in preparation for a sports field. Modern fill was encountered during test excavations in the central west of the project area with geotechnical investigations confirming its continuation of up to ~1.1 m depth. This context is likely a result of 20th century historical activities, such as installation and removal of any previous buildings and/or ancillary structures, services, cess pits, landscaping, construction utilities across this portion of the project area. Test excavations along the northern boundary of the western half of the project area confirmed natural deposits present which exclude evidence of fill contexts that are present further south in the project area.

Inspection of the current land surface failed to identify any cultural materials. Archaeological test excavations in the north-west of the project area identified evidence of A1 and B2 soil units relating to the Leycester soil landscape. The A1 horizon was encountered between 30–100 cm below surface and is considered the only portion of the project area that would retain cultural materials if present. Given the presence of modern fill in multiple locations of the site exceeding these depths, it indicates that substantial portions of the site have limited potential for buried cultural materials. However, an isolated silcrete core was found at 55 cm depth within the lower portion of the A1 horizon along the northern boundary of the project area. This part of the project area is predicted to be subject of lesser disturbance with limited fill present at this locale. Silcrete is not a local raw material although has been found in quarry sites regionally. The stone artefact suggests that the project area was, at least, sporadically visited, representing transitory use of the landscape - likely an isolated loss or random discard event.

Discussions with the local Aboriginal community have not identified any project specific cultural places or values to date that would be affected by the project. Several places are noted in the regional, as well as the value of nearby waterfalls as places for gender specific activity, but none intersect the project.

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- KEY
- Site boundary
 - Project design
 - 10 m buffer surrounding NRBL IF1
 - Existing environment
 - Major road
 - Vehicular track

Archaeological resource
of the project area

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 7.1



Source: EMM (2023); DFSI (2017, 2020); Metromap (2023)



8 Significance assessment

8.1 General

All Aboriginal objects in NSW are protected under the *National Parks and Wildlife Act 1974* (NPW Act). It is recognised that the impact or destruction of sites may be necessary to allow other activities or developments to occur. In order for the consent authority to make informed decisions on such matters, an important element of cultural resource management is determining the significance of cultural heritage places and objects to understand what may be lost and how best it can be avoided or mitigated. However, it is highlighted that something can be of little or no significance and still be protected under the NPW Act.

Cultural significance is outlined in Article 1.2 of the *Burra Charter* - the best practise document for managing cultural heritage – as ‘aesthetic, historic, scientific, social or spiritual value for past, present or future generations’ (Australia ICOMOS 2013). These values are reiterated in the NSW guidelines, which determines cultural significance of a place can be assessed by identifying the values that are present across the subject area and assessing what is important and why (OEH 2011). In assessing the scientific significance of sites, aspects such as rarity and representativeness and the integrity must be considered. A site or object that is rare will have a heightened significance, although a site that is suitable of conservation as ‘representative’ of its type will also be significant. Conversely, an extremely rare site may no longer be significant if its integrity has been sufficiently compromised.

The criteria adopted for this report are defined in Table 8.1. The management implications of these sites’ significance are discussed in subsequent sections.

Table 8.1 A summary of criteria used to assess the cultural significance (OEH 2011, 8–10)

Criterion	Definition
Social value —Does the place have a strong or special association with a particular community or cultural group for social, cultural or spiritual reasons?	<p>Social (or cultural) value refers to the spiritual, traditional, historical or contemporary associations and attachments the place or area has for Aboriginal people. Social or cultural value is how people express their connection with a place and the meaning that place has for them.</p> <p>Social or cultural value can only be identified through consultation with Aboriginal people.</p>
Historic value —Is the place important to the cultural or natural history of the local area and/or region and/or state?	<p>Historic value refers to the association of a place with a historically important person, event, phase or activity. Historic places do not always have physical evidence of their historical importance (such as structures, planted vegetation or landscape modifications). They may have ‘shared’ historic values with other (non-Aboriginal) communities.</p>
Scientific (archaeological) value —Does the place have potential to yield information that will contribute to an understanding of the cultural or natural history of the local area and/or region and/or state?	<p>Scientific (archaeological) value refers to the importance of a landscape, area, place or object because of its rarity, representativeness and the extent to which it may contribute to further understanding and information.</p> <p>Information about scientific values is gathered through archaeological investigation undertaken in this report.</p>
Aesthetic value —Is the place important in demonstrating aesthetic characteristics in the local, regional, and/or State environment?	<p>Aesthetic value refers to the sensory, scenic, architectural and creative aspects of the place. It is often linked with social value, and can consider form, scale, colour, texture and material of the fabric or landscape, and the smell and sounds associated with the place and its use. This value is only relevant to archaeological sites on only rare occasions, such as rockshelters that contain art, or culturally modified trees in prominent positions, etc.</p>

8.2 Statement of significance

The project area includes one Aboriginal site, NRBL IF1 (Figure 7.1).

NRBL IF1 AHIMS (#04-4-0321) has been assessed as having low scientific significance as it is an isolated stone artefact. As it is an isolated occurrence it has low research potential and is a well-represented site type as there are many occurring across the region (Table 8.2). While important in demonstrating the longevity and continued use of the region by Aboriginal people in the past, it is considered that little further information can be obtained from additional investigation of this site.

No project specific cultural values have been provided by the local Aboriginal community for the identified site.

Table 8.2 **Significance of Aboriginal objects and/or sites identified.**

Site	AHIMS #	Site Type	Significance				
			Scientific	Aesthetic	Historical	Cultural	Overall
NRBL IF1	XX-X-XXXX	Isolated Find	Low	-	-	Low	Low

Notes:

1. Values are only assigned where the site fulfils that specific criterion.
2. In the case of the cultural criterion, it is ranked in relation to whether the site is important to one individual (low), a mixed view from the Aboriginal participants (moderate) or broad-scale support from all stakeholders (high).
3. The overall significance is comparable with the highest ranking achieved in any of the four main criteria.

9 Impact assessment

9.1 Key findings

- The proposed works involve the demolition of structure, re-orientation of the site, establishment of new structures, and extensive landscaping for playing field and outdoor play spaces. The proposed works would involve earthworks and movement of heavy machinery around the site to facilitate the project. These activities would require localised impacts across the site to depths probably >1 m through removal of existing foundations and the establishment of new structures via piles or strip footings and associated services. Given the cultural material was recovered in the upper 55 cm of the soil profile, these activities have the potential to result in impacts.
- The Aboriginal site recovered from test excavations, NRBL IF1 (AHIMS #04-4-0321), is located directly outside and abutting the northern portion of the development footprint which will be directly impacted by the extensive earth clearing and levelling that will be undertaken to prepare the site for construction.
- Based on the prevalence of low density stone artefactual material comparable with NRBL IF1 (AHIMS #04-4-0321) across NSW, the loss of the object is considered to have negligible intergenerational or cumulative impacts.

9.2 Project impacts

As outlined in Section 1.2, the project will involve the demolition and construction of structures and buildings across the project area. This includes the demolition of existing buildings, establishment of temporary school structures and facilities, construction of elevated school building with amenities, storage and landscaping.

Detailed construction drawings are not yet available for the proposed works. However, we understand that impacts to the ground surface can be expected in the following circumstances:

- where excavation is required to remove existing slabs, foundations, masonry piers and/or concrete footings of the existing structures and buildings
- where excavation is required to level an existing slope, and/or to create foundations for the construction of new school buildings and temporary school buildings; this may include shallow (<1 m depth) strip footings or capping beams, and may also involve much deeper excavation piling supports and trenching for upgraded service infrastructure (localised impacts to >1 m in depth)
- where landscaping works require excavation to create terraced gardens and outdoor play spaces, or to plant vegetation with significant root-ball structures (<1 m in depth).

Additional indirect impacts to the ground surface and underlying deposits can occur from the movement of heavy machinery and storage materials, equipment and vehicles, especially where these movements or storage activities occur in areas that do not have existing hardstand installed. These activities can cause compaction and downward movement of the upper portions of the soil profile, which may affect cultural material, if present.

9.3 Potential Aboriginal heritage impact

Two types of potential impact are considered, direct and indirect. Direct impacts relate to the construction activities and their removal, truncation and/or disturbance of the ground surface. This would include the removal of vegetation, removal or modification of geological outcropping and the removal or disturbance of the upper soil profile. Indirect impacts are the result of both construction and post-construction activities that may result in environmental changes that would affect cultural material within, or near the project activities. General examples of indirect impact may include the burial of a soil profile resulting in its compression and indirectly damaging buried cultural material, or an increase in dust being blown into a rock shelter and negatively affecting art motifs should they be present.

Cultural material found within the project area was identified within the upper 55 cm of the soil profile. As outlined in Section 9.2, the proposed development activities would result in direct impacts to these sites and deposits (Table 9.1).

The Aboriginal site NRBL IF1 (AHIMS #04-4-0321) is located directly north and abutting the proposed development footprint and as such is highly likely to be affected by the extensive earthworks and leveling that will be undertaken to prepare the site for construction. NRBL IF1 (AHIMS #04-4-0321) consists of an isolated find found in a natural deposit consistent with the Leicester soil landscape. Although NRBL IF1 (AHIMS #04-4-0321) reflects the transitory movement through the Blakebrook region by Aboriginal people, it is considered to have limited archaeological significance. Regardless of this, the works are extending through a cultural landscape that contains materials, and both direct and indirect impacts, including design changes, requires careful management as the project progresses. Strategies and recommendations to manage this are outlined in Section 10.

Table 9.1 Summary of potential impacts to Aboriginal sites and objects.

AHIMS ID	Site name	Overall significance	Type of harm	Location and/or activity causing harm	Degree of harm	Consequence of harm
-	NRBL23 IF1 (AHIMS #04-4-0321)	Low	Direct	Bulk earthworks	Total	Complete loss of value








9.4 Inter-generational equity

Intergenerational equity is the principle whereby the current generation should ensure the health, diversity and longevity of the environment for the benefit of future society. For Aboriginal heritage management, intergenerational equity can be considered primarily in terms of the cumulative impacts to Aboriginal objects, sites and/or places in a region. If few Aboriginal objects and places remain in a region (e.g. due to development impacts), there are fewer opportunities for future generations of Aboriginal people and the broader community to enjoy the cultural benefits. Information about the integrity, rarity and representativeness of the Aboriginal objects, sites and places that may be impacted, and how they inform the past visitation and occupation of land by Aboriginal people, are relevant to the consideration of intergenerational equity and the understanding of the cumulative impacts of a project.

The proposed impacts would result in direct impacts to NRBL IF1 (AHIMS #04-4-0321) which is located in the north-western portion of the site. Isolated finds are found widely across the locale, region and broader NSW, and as such the loss of a single object would have negligible intergenerational or cumulative impacts.



KEY

-  Site boundary
 NRBL IF1
 Project design
 Development footprint
 Project impact
 Existing environment
 Major road
 Vehicular track

Impact assessment

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 9.1



10 Management strategy and recommendations

10.1 Key findings

- The ACHA concludes that one Aboriginal site was identified within the project area in a natural deposit of the Leycester soil landscape which would be partially impacted by the proposed works. NRBL IF1 (AHIMS #04-4-0321) consists of a single stone artefact of considered low significance in the north-west portion of the project area.
- Recommendations are proposed for inclusion in the project approval to guide post-approval requirements for Aboriginal heritage (Section 10.3). These include obtaining an Aboriginal Heritage Impact Permit to allow harm to NRBL IF1 (AHIMS #04-4-0321) prior to development activity proceeding.

10.2 Management strategy

This ACHA process, which included consultation with the Aboriginal community and sub-surface archaeological investigation, identified one Aboriginal site within the project area, NRBL IF1 (AHIMS #04-4-0321), an isolated find recovered from the north-western portion of the project area.

NRBL IF1 (AHIMS #04-4-0321) is a singular silcrete core artefact recovered 55 cm below the surface. The artefact was located within a natural topsoil unit (A1 horizon) of the Leycester soil landscape. Based on test excavation, it is considered improbable for a significant portion of the A1 horizon (within which other cultural materials may be expected) to occur, with modern fill found across much of the site and extending to depths below the thickness of the topsoil unit. However, there is some potential for additional, albeit very low, numbers of Aboriginal objects elsewhere within the project area in the fill and topsoil units where present. These are considered to reflect transitory use of the region in the past, with no evidence of more significant or extensive activity within the project area. It is not considered that further investigation of this area would alter the significance or understanding of this cultural deposit.

In NSW, Aboriginal objects are provided with statutory protection by the *National Parks and Wildlife Act 1974*. In general, where a proposed activity will result in harm to an Aboriginal object, an Aboriginal Heritage Impact Permit (AHIP) is required. The AHIP contains conditions intended to manage and mitigate the identified impact, allowing harm to proceed. Impacts to NRBL IF1 (AHIMS #04-4-0321) would require an AHIP prior to development being permissible. Given the low significance and previous disturbance of the project area, it is considered that avoidance would be unnecessary and additional archaeological mitigation is not required. The proponent should consider the implementation of cultural inductions and/or cultural monitoring of initial bulk earthworks by the Widjabul Wia-bal Gurrmbil Aboriginal Corporation to develop and maintain relationships with the local Aboriginal community.

10.3 Recommendations

The following recommendations should be integrated into the management of the project:

1. No ground disturbance activities are permitted within 10 m of identified Aboriginal site, NRBL IF1 (AHIMS #04-4-0321) without having obtained an Aboriginal Heritage Impact Permit (AHIP) from Heritage NSW. The AHIP should seek to encompass the entirety of the proposed development activity within the project area (Figure 10.1). Given the paucity of cultural materials encountered within the site, and presence of surface and upper soil profile disturbance, no further archaeological mitigation is proposed for inclusion in the AHIP.

2. The Construction Environment Management Plan (CEMP), or equivalent, should reinforce how the cultural landscape is considered throughout the project and detail the rehabilitation of the project area. In discussion with the Aboriginal community, rehabilitation of areas where infrastructure is not remaining after the project should be undertaken to determine suitable ecological communities and other factors in returning the cultural landscape as close to its current state as feasible.
3. To avoid inadvertent impact, the proponent should implement cultural awareness training for all relevant personnel and contractors involved in the project of the relevant heritage considerations, legislative requirements, and recommendations identified in this assessment. This should be conducted on Country by a member of the Widjabul Wia-bal Gurrmbil Aboriginal Corporation as part of the site induction process.
4. Consultation should be maintained with the Widjabul Wia-bal Gurrmbil Aboriginal Corporation throughout the life of the project and subsequent ground disturbance stages of the project.
5. A copy of the ACHA should be lodged with AHIMS and provided to the RAP.
6. AHIMS Site Recording Forms for the newly identified Aboriginal site within the project area should be submitted to the AHIMS database once their validation has been completed.
7. If any part of the construction footprint is located outside the areas identified in this ACHA, or if any alteration is proposed further assessment of these area(s) should be undertaken to identify and appropriately manage Aboriginal objects and/or sites that may be present.
8. Where the heritage consultant changes through the project, suitable hand over should be undertaken to ensure no loss or mistranslation of the intent of the information, findings and future steps in heritage management occur.

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KEY

- Site boundary
- AHIP curtilage
- Project design
- Proposed AHIP boundary
- NRBL IF1
- Development footprint
- Existing environment
- Major road
- Vehicular track

Proposed AHIP boundary

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 10.1

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Abbreviations

AHD	Australian Height Datum
ACHA/ACHAR	Aboriginal cultural heritage assessment report
AHIMS	Aboriginal Heritage Information Management System
ACHMP	Aboriginal Cultural Heritage Management Plan
AMBS	Australian Museum Business Services
BP	Years before present
c.	circa
cm	centimetres
DEC	Department of Environment and Conservation, now Heritage NSW
DECCW	Department of Environment Climate Change and Water, now Heritage NSW
DPC	Department of Premier and Cabinet
DPE	Department of Planning and Environment
DPIE	Department of Planning, Industry and Environment, now DPE
EIS	Environmental Impact Statement
EMM	EMM Consulting Pty Limited
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
ERM	Environmental Resources Management
ESD	Ecologically sustainable development
FGS	Fine grained siliceous
g	Grams
GIS	geographical information system
GPS	global positioning system
ha	Hectare
ICOMOS	International Council on Monuments and Sites
IMTC	Indurated mudstone/tuff/chert
ka	Thousand years ago (e.g. 1,000 = 1 ka)
km	kilometres
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
LGA	Local Government Area
m	metres
m ²	square metres

Abbreviations

mm	millimetres
n	Number
NEC	Newcastle Education Campus
NSW	New South Wales
OEH	Office of Environment and Heritage, now Heritage NSW
PAD	Potential archaeological deposit
RAP	Registered Aboriginal Party
t	Tonne
TP	Test pit

Glossary

Many of these definitions have been taken from the *Code of Practice for archaeological investigation of Aboriginal objects in NSW* (DECCW 2010).

Aboriginal object: A physical manifestation of past Aboriginal activity. The legal term is defined in the *National Parks and Wildlife Act 1974* section 5 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.

Typical examples include stone artefacts, grinding grooves, Aboriginal rock shelters which by definition include physical evidence of occupation, midden shell, hearths, stone arrangements and other landscape features which derive from past Aboriginal activity.

Archaeological survey: A method of data collection for Aboriginal heritage assessment. It involved a survey team walking over the land in a systematic way, recording information. Activities are not invasive or destructive.

Aboriginal culturally modified tree: A tree of sufficient age to have been mature at the time of traditional Aboriginal hunter-gatherer life and therefore generally of more than 220 years ago with evidence of bark or cambium wood removal for the purpose of implement manufacture, footholds, bark sheet removal for shelter, or extraction of animals or other food. Care must be taken to distinguish Aboriginal scars from the much more common natural causes of branch tear, insect attack, animal impact, lightning strike and dieback. Culturally modified tree recognition guidelines exist to distinguish these features. Naturally scarred trees are often misidentified as Aboriginal culturally modified trees.

Aboriginal site: The location where a person in the present day can observe one or more Aboriginal objects. The boundaries of a site are limited to the extent of the observed evidence. In the context of this report a 'site' does not include the assumed extent of unobserved Aboriginal objects (such as archaeological deposit). Different archaeologists can have varying definitions of a 'site' and may use the term to reflect the assumed extent of past Aboriginal activity beyond visible Aboriginal objects. Such use of the term risks defining all of Australia as a single 'site'.

Aboriginal stone artefact: A stone object with morphological features derived from past Aboriginal activity such as intentional fracture, abrasion or impact. Artefacts are distinguished by morphology and context. Typically flaked stone artefacts are distinguished from naturally broken stone by recognition of clear marginal fracture initiation (typically herzian/conchoidal or wedging initiation) on highly siliceous stone types which can often be exotic to the area. Care must be taken to distinguish modern broken stone in machine impacted contexts and therefore context must be carefully considered as well as morphology.

Aggradation: a term used in geology for the increase in land elevation, typically in a river system, due to the deposition of sediment.

AHIMS: Aboriginal Heritage Information Management System — a computer software system employed by the Office of Environment and Heritage to manage many aspects of Aboriginal site recording and permitting. AHIMS includes an Aboriginal sites database which can be accessed via an internet portal.

Archaeological deposit: Aboriginal objects occurring in one or more soil strata. The most common form of archaeological deposit relates to the presence of a single conflated layer of Aboriginal stone artefacts worked into the topsoil through **bioturbation**.

Backed artefact: A thin flake or blade-flake that has been shaped by secondary flaking (**retouch**) along one lateral margin. The retouched margin is typically steep and bipolar to form a blunt 'back' in the manner of a modern scalpel blade. Distinctive symmetrical and asymmetrical forms are typically found called geometric **microliths** and Bondi points respectively. A thick symmetrical form, called an Elouera, is typically the size of a mandarin segment.

Bioturbation: is the reworking of soils and sediments by animals or plants. Its effects include changing texture of sediments (diagenetic), bioirrigation and displacement of microorganisms and non-living particles.

Bipolar flaking: Where the stone to be worked is rested on an anvil or other stone before being hit by the hammerstone. This results in the presence of negative flake scars on both ends of the core.

Bondi point: See backed artefact definition.

Brown podosols: Topsoils have loamy textures. A2 horizons are common, there is a clear boundary onto the B horizon. They have a sandy clay to heavy clay texture (typically occur on upper and mid-slopes).

Chocolate Soils: Soils that are typically formed in a basaltic parent material where slope or bedrock strata influence drainage. Surface horizons comprise loam, clay loam or silty clay loam. There is a gradual boundary to a brown or brownish black B horizon. There is no A2 horizons.

Conchoidal: A term used in relation to fracture surfaces on Aboriginal stone artefacts - bulb-like in the manner of a bulbous protrusion on a bivalve shell.

Elouera: See backed artefact definition.

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.

Exposure: estimates the area with a likelihood of revealing buried artefacts or deposits, not just an observation of the amount of bare ground.

Geometric microlith: See backed artefact definition.

Grinding grooves: Grinding grooves typically derive from the sharpening of stone hatchet heads on sandstone rock. Grooves appear as elliptical depressions of around 25 cm length with smooth bases. Although mostly occurring in association with water to wash the abraded stone dust away from the groove, such sites have been recorded away from water. Narrow grooves or broad abraded areas may occur less commonly and may be derived from spear sharpening or other grinding activities.

Haematite: a pigment featured in ochre used for tinting with a permanent colour.

Holocene: A period of time generally 10,000 years, which marks the end of the last ice age, to the present.

Igneous: relating to or involving volcanic or plutonic processes.

Indurated mudstone/tuff (IMT): the fine textured, very hard, yellowish, orange, reddish-brown or grey rocks from which stone artefacts are made.

Isotropic: Having a physical property that has the same value when measured in different directions. In relation to stone used for stone tools a fracture path is not hindered by layer boundaries or other favoured plane of cleavage.

Microlith: Very small fragments of flakes retouched into geometric shapes and usually present on tools like barbed spears, arrows and sickles.

Midden: A collection of shells and associated economic remains resulting from Aboriginal food gathering and processing activity. Middens comprise shellfish remains of consistent size in a rich dark earth matrix commonly associated with stone artefacts, fish bone and animal bone although shells are commonly the most obtrusive element.

Keeping place: A room or facility with the express and exclusive purpose of storing Aboriginal cultural heritage materials with accompanying documentation in a secure and accessible manner which protects their cultural heritage values.

Krasnozems: Mainly loams, clay loams and silty clay loams with a clear or gradual boundary to a dark reddish brown B horizon. Clays are typically light to medium and occasionally heavy.

Lithosols: Soils that have little or no profile development. They occur on steep slopes and are usually shallow and are left mainly as uncleared native bushland.

Open stone artefact site/stone artefact site: An unenclosed area where Aboriginal stone artefacts occur – typically exposed from a topsoil archaeological deposit by erosion. Typically the term is used to refer to two or more artefacts although this is an arbitrary distinction. A general ‘rule of thumb’ boundary definition employed by archaeologists is that artefacts or features more than 50 m apart are regarded as separate sites, however there is no theoretical imperative dictating such a rule. (The 50 m separation rule is used for the most part in EMM’s work).

Pirri point: A leaf-shaped stone implement with unifacial retouch extending from the lateral margins to a central keel running the length of the dorsal surface.

Pleistocene: A period of time 2.6 million years ago to 10,000 years ago. Reference to ‘Pleistocene sites’ generally means reference to sites older than 10,000 years.

Podosols: Soils with accumulations of organic matter, iron and aluminium. They are usually sand textured to depth. Yellow and red podosols are generally acid neutral. Yellow podosols have coarse to medium textured A horizons.

Point cluster: A group of GPS points used to identify the locations of individual artefacts in the field.

Potential Archaeological Deposit (PAD): An area where there is an inferred presence of Aboriginal objects in the soil based on the environmental context which is typically associated with discovery of Aboriginal objects in analogous areas. This is not strictly a ‘site’ type, although AHIMS records it as such for the purpose of associating Aboriginal heritage Impact Permits with geographical areas.

Red podosols: Podzols with a pronounced texture contrast and clear to abrupt boundaries between A and B horizons. A2 is often massive and gravelly.

Retouch: The modification of the edges of a flake or tool by the removal of a series of small flakes.

Siliceous Sands: Sands that are usually found on coarse-grained sandstones and in sandstone colluvium. They are often sandstone outcrops present in the landscape. The topsoil has a loamy sand to light sandy clay.

Scarp: a steep slope characterised by outcropping bedrock. In this report, scarp refers to a combination of landform elements including scarp foot slopes, scarps, and cliff lines where outcropping sandstone is present in the landscape 10% and above.

Spur: the lateral crests of land that descend from the summit of hills or ridges. Spurs typically extend, with decreasing elevation, closer to streams and valley floors than the main crest of a hill.

Taphonomic: the events and processes, such as burial in sediment, leading to the degradation, decomposition or preservation of objects.

Thumbnail scraper: A thumbnail sized thin flake with steep unidirectional retouch or use-wear around a convex working edge.

Transect: A sample unit which is walking line or corridor across the project area.

Upsidence: phenomena that occurs when mining approaches and undermines river valleys. It can result in cracking and buckling of river beds and rock bars and localised loss of water flow.

Visibility: The amount of bare ground on exposures which might reveal artefacts or other archaeological materials.

Yellow earths: predominantly sandy-textured soils with earthy porous fabric, weak profile differentiation and gradual or diffuse boundaries except for the darker A1 horizon.

Yellow podosols: Podsoles which typically occur on the upper slopes of steep landscapes and on the mid to lower slopes of others. The A2 soil horizon is present in most profiles and the boundary change to the B horizon is generally clear. The B horizon is typically sandy clay to heavy clay.

Appendix A

Legislative context

A.1 Commonwealth

A.1.1 *Aboriginal and Torres Strait Islander Heritage Protection Act 1984*

The *Aboriginal and Torres Strait Islander Heritage Protection Act 1984* preserves and protect areas (especially sacred or intangible sites) and places of particular significance to Aboriginal people from damage or destruction. Steps necessary for the protection of a threatened place are outlined in a gazetted Ministerial Declaration (Sections 9 and 10) and which can result in a cessation of any development activity.

In addition, the Act also protects objects by Declaration, notably Aboriginal skeletal remains (Section 12). This can be applied at a State level where a State is unwilling or unable to provide such protection.

A.1.2 *Environment Protection and Biodiversity Conservation Act 1999*

The *Environment Protection and Biodiversity Conservation Act 1999* provides for protection of natural and cultural heritage places. The Act establishes a National Heritage List (NHL) and a Commonwealth Heritage List (CHL) upon which places of natural or cultural significance can be listed. Sites at a national level and can be in public or private ownership. The CHL is limited to places owned by the Commonwealth, and most frequently encompass Department of Defence sites. Sites and places listed on the NHL are considered to be of State and local heritage value, even if they are not listed or documented as such at a State level.

The values of sites and places on the NHL/ CHL are protected under the EPBC Act. The Act requires that the Minister administering the Act assess any action which has, will have, or is likely to have, a significant impact on the heritage values. Where relevant, a referral is made to the relevant Commonwealth Department, and either approval, approval with controls, or rejection of the proposed action is determined.

A.1.3 *Native Title Act 1993*

The *Native Title Act 1993* provides recognition and protection for native title. The Act establishes the managing body, National Native Title Tribunal, who administers native title claims to rights and interests over lands and waters by Aboriginal people. It also administers the future act processes that allow proponents to identify and manage potential native title issues for a given activity on a site where a claim has yet to be made or finalised.

In addition, the Act provides for Indigenous Land Use Agreements (ILUA), which is an agreement between a native title group and others about the use and management of land and waters. ILUAs were introduced as a result of amendments to the Act in 1998. They allow people to negotiate flexible and bipartisan agreements to suit their particular circumstances often circumventing lengthy timeframes associated with the native title process. An ILUA can be negotiated over areas where native title has, or has not yet, been determined. They can be part of a broader determination or settled separately.

A.2 State

A.2.1 *Environmental Planning and Assessment Act 1979*

The *Environmental Planning and Assessment Act 1979* (EP&A Act) is the over-arching Act that dictates the nature of assessment and management of the environment during a development project, and within which heritage forms a component. requires that environmental and heritage impacts are considered by consent authorities prior to granting development approvals.

The Act has two main approval pathways within which heritage needs to be considered. Generally for smaller scale (either financially or spatially), Parts 4 (Division 4.1) and 5 (Division 5.1) of the Act are implemented. Part 4 requires that a proponent submits a Development Application (DA) to local council for a given development, and within this document a consideration of Aboriginal and historical heritage is required. The specific nature of the assessment is usually determined at a pre-DA meeting with the council, and in relation to the relevant heritage Acts. Where Aboriginal heritage is identified as an issue, the DA may become Integrated Development, whereby the State government is also required to review and provide comments on the DA prior to its issue. Part 5 of the Act is a similar process, but only relates to approvals developed and issued by State government departments. Each State government department has their own internal approach to considering environmental issues, but ultimately must develop a Review of Environmental Factors (REF), which is comparable to a DA, and which requires consideration and management of heritage. Similarly where heritage is identified as an issue, liaison with relevant State consent authorities and approvals under other Acts may still be required.

The other approval pathway relates to State Significant Development and/or Infrastructure (Parts 4.7 and 5.2, respectively). These processes require an Environmental Impact Statement (EIS) to be developed for a project and assessed currently by the Department of Planning, Industry and Environment. Importantly, the SSD and SSI processes turn off a number of pieces of other legislation, including parts of the *National Parks and Wildlife Act 1974*. In the case of Aboriginal heritage, both the assessment and approval for harm are dictated by the Secretary's Environmental Assessment Requirements (SEARs) outlining the contents and scope of the EIS, and the Project Approval that dictates controls on how a development should proceed.

A.2.2 *National Parks and Wildlife Act 1974*

The *National Parks and Wildlife Act 1974* (NPW Act) provides protection for Aboriginal objects and places across NSW:

- 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 “any place declared to be an Aboriginal place under section 84”. This is a very specific piece of legislation that provides process and management of Aboriginal sites of cultural, but not necessarily scientific, values. They are commonly, but not always associated with intangible values.
- Any place declared to be an Aboriginal place by the Minister for the Environment, under Section 84 of the Act, is also protected.

It is an offence to disturb Aboriginal objects or places without a Aboriginal Heritage Impact Permit (AHIP), which is outlined in Section 90 of the Act. Currently, such permits can be sought from the Chief Executive of the NSW Department of Premier and Cabinet (DPC), with the recent relocation of the Office of Environment and Heritage.

To obtain an AHIP, certain assessment and documentation (outlined in this report) must be provided to DPC for their consideration. Once satisfied, they may endorse an AHIP to harm cultural heritage either conditionally or unconditionally. They can also refuse an application as outlined in Section 90C of the Act, and which can be appealed in accordance with Section 90L.

A.2.3 *Aboriginal Land Rights Act 1983*

The *Aboriginal Land Rights Act 1983* provides process and protocols for the transfer of vacant Crown land ownership to a Local Aboriginal Land Council, where the land is not for an essential purpose or for residential land. These lands are then managed and maintained by the Local Aboriginal Land Council.

For the purposes of this report, the Act is primarily important to inform relevant Aboriginal communities for consultation and where Crown land forms part of the development area may require additional liaison with the LALC as a potential, or existing, landowner.

Appendix B

Aboriginal community consultation

B.1 Consultation log and communications record

Aboriginal Consultation Requirements for Proponents (DECCW 2010)*
ABORIGINAL COMMUNICATIONS LOG

Project Name: AH Phase 2 Northern Rivers Schools						Project #: E230642
DATE	OUTGOING / INCOMING	ORGANISATION	CONTACT MADE BY	CONTACT TO	CONTACT TYPE	COMMENTS
Blakebrook Public School						
AGENCY REQUESTS						
2-Jun-23	Outgoing	Heritage NSW	Rohani Dutch (EMM)	Heritage NSW	Email	Request for Identification of Aboriginal stakeholders/parties
2-Jun-23	Outgoing	Lismore City Council	Rohani Dutch (EMM)	Lismore City Council	Email	Request for Identification of Aboriginal stakeholders/parties
2-Jun-23	Outgoing	Ngulingah Local Aboriginal Land Council	Rohani Dutch (EMM)	Ngulingah LALC	Email	Request for Identification of Aboriginal stakeholders/parties
2-Jun-23	Outgoing	North Coast Local Land Services	Rohani Dutch (EMM)	North Coast Local Land Services	Email	Request for Identification of Aboriginal stakeholders/parties
2-Jun-23	Outgoing	The Office of the Registrar, Aboriginal Land Rights Act 1983	Rohani Dutch (EMM)	The Office of the Registrar, Aboriginal L	Email	Request for Identification of Aboriginal stakeholders/parties
2-Jun-23	Outgoing	NTSCorp	Rohani Dutch (EMM)		Email	Request for Identification of Aboriginal stakeholders/parties
2-Jun-23	Outgoing	Native Title Tribunal	Rohani Dutch (EMM)		Email	Request for Identification of Aboriginal stakeholders/parties
2-Jun-23	Incoming	Native Title Tribunal		Rohani Dutch (EMM)	Email	Identified native title determinations and ILUA encompassing the study area (Blakebrook PS). NCD2022/001 Widjabul Wia-Bal - Determinations NI2022/002 Widjabul Wia-bal Goori Naa Land Use Agreement
13-Jun-23	Incoming	Heritage NSW	Barry Gunther	Rohani Dutch (EMM)	Email	Provided list of Aboriginal Stakeholders with the Lismore LGA
14-Jun-23	Incoming	Lismore City Council	Elise Taylor	Rohani Dutch (EMM)	Email	Provided Ngulingah LALC details, recommended requesting information from this LALC.
19-Jun-23	Incoming	The Office of the Registrar, Aboriginal Land Rights Act 1983	Rachel Rewiri	Stacey Kennedy (EMM)	Email	Provided Ngulingah LALC details, recommended requesting information from this LALC.
21-Jun-23	Incoming	NTSCorp	Conor Wakefield	Stacey Kennedy (EMM)	Email	Identified that The Widjabul Wia-bal Gurrmbil Aboriginal Corporation is the Registered Native Title Body Corporate (RNBTC) established by Widjabul Wia-bal to hold native title rights and interests and to progress Widjabul Wia-bal's interests. NTS CORP Ltd is the legal representative of the Widjabul Wia-bal Gurrmbil Aboriginal Corporation.
Stage 2/3 - PRESENTATION OF INFORMATION AND PROPOSED ASSESSMENT METHODS						
20-Jun-23	Outgoing	Widjabul Wia-bal C/- NTSCORP Limited	Stacey Kennedy (EMM)	Conor Wakefield	Email	Sent out methodology letter
FIELDWORK						
3-Aug-23	Outgoing	Widjabul Wia-bal C/- NTSCORP Limited	Mikhaila Chaplin	Conor Wakefield	Email	Follow up email. Email returned that Conor no longer works for NTS Corp
3-Aug-23	Outgoing	NTSCorp	Mikhaila Chaplin	NTSCorp	Phone	New email given to contact
3-Aug-23	Outgoing	Widjabul Wia-bal C/- NTSCORP Limited	Matilda Vaughan	Matilda Vaughan	Email	Follow up email on site officers for excavation
3-Aug-23	Outgoing	Widjabul Wia-bal C/- NTSCORP Limited	Matilda Vaughan	Mikhaila Chaplin	Email	List of names
3-Aug-23	Outgoing	Noel King Jnr	Mikhaila Chaplin	Noel King Jnr	Phone	Confirmed available for site work
3-Aug-23	Outgoing	Chris Brown Jnr	Mikhaila Chaplin	Chris Brown Jnr	Phone	Confirmed available for site work
3-Aug-23	Outgoing	Jamal Roberts	Mikhaila Chaplin	Jamal Roberts	Phone	Phone disconnected
3-Aug-23	Outgoing	Aunty Queenie Speeding	Mikhaila Chaplin	Aunty Queenie Speeding	Phone	Confirmed available for site work
3-Aug-23	Outgoing	Noel King Jnr, Chris Brown Jnr and Aunty Queenie Speeding	Mikhaila Chaplin	Noel King Jnr, Chris Brown Jnr and Aunty Queenie Speeding	Email	Excavation details for upcoming work
8-Aug-23	Outgoing	Noel King Jnr	Mikhaila Chaplin	Noel King Jnr	Phone	No answer
8-Aug-23	Outgoing	Chris Brown Jnr	Mikhaila Chaplin	Chris Brown Jnr	Phone	No answer
8-Aug-23	Outgoing	Aunty Queenie Speeding	Mikhaila Chaplin	Aunty Queenie Speeding	Phone	Confirmed available for site work
9-Aug-23	Incoming	NTSCorp	Matilda Vaughan	Mikhaila Chaplin	Email	Details on Jamals new phone number
9-Aug-23	Outgoing	Jamal Roberts	Jamal Roberts	Mikhaila Chaplin	Email	Call to Jamal. Voicemail and text left.
9-Aug-23	Incoming	Noel King	Noel King	Mikhaila Chaplin	Text	Noel confirmed his attendance for site work and let us know he will bring signed contact on the day.
10-Aug-23	Outgoing	All RAPs	Mikhaila Chaplin	Queenie, Noel, Chris, Jamal	Email	Email with site details and follow up on insurances/ subcontractor contract
10-Aug-23	Incoming	Chris Brown Jnr	Chris Brown	Mikhaila Chaplin	Phone	Confirmed attendance for fieldwork
14-Aug-23	Incoming	Aunty Queenie Speeding	Queenie	Mikhaila Chaplin	Text	No longer able to attend fieldwork
Fieldwork occurred on 14-16 August with Noel King and Chris Brown						
14 to 16 August 23						
8-Sep-23	Outgoing	EMM Consulting	Stacey Kennedy (EMM)	Heritage NSW	Email	Notification that test excavations of Blakebrook School have been completed and one stone artefact was identified
Stage 4 - DRAFT ACHA REVIEW						
25-Sep-23	Outgoing	NTSCorp	Stacey Kennedy (EMM)	Matilda Vaughan	Email	Email to RAP providing them with a copy of the draft ACHA for review and comment. The email invites representatives to review and provide any feedback, thoughts or input within 28 days (by Mon 23 October 2023).
4-Oct-23	Outgoing	NTSCorp	Stacey Kennedy (EMM)	Matilda Vaughan	Email	Email to RAP inviting them to attend a meeting on 10 October 2023 in which to discuss the draft ACHA and provide comment/feedback.
4-Oct-23	Incoming	NTSCorp	Matilda Vaughan	Stacey Kennedy (EMM)	Email	Email from NTSCorp thanking EMM for the previous emails and stating that the draft ACHA has been circulated to the board of Widjabul Wia-bal Gurrmbil Aboriginal Corporation RNTBC for their comments. They also indicated that they would enquire as to director's availability on 10 October 2023 for the meeting described and that they would let us know asap if it is feasible.
5-Oct-23	Incoming	NTSCorp	Matilda Vaughan	Stacey Kennedy (EMM)	Email	Further email from NTSCorp to advise that Auntie Queenie will be able to attend the meeting set for 10 October 2023 and that they are waiting to hear back from other board members.
9-Oct-23	Incoming	NTSCorp	Matilda Vaughan	Stacey Kennedy (EMM)	Email	Further email from NTSCorp to advise that Director Noel King Jnr will be attending the meeting set for 10 Octpber 2023
9-Oct-23	Outgoing	NTSCorp/Widjabul Wia-bal AC	Stacey Kennedy (EMM)	Noel King Jnr and Aunty Queenie (Widjabul Wia-bal AC)	Email	Email with microsoft teams meeting link sent.

10-Oct-23	-	EMM Consulting	Stacey Kennedy (EMM) and Nicolas Reilly (EMM)	Noel King Jnr (Widjabul Wia-bal AC)	Online meeting	Online meeting held to discuss the Blakebrook draft ACHA. Highlight of key findings and proposed archaeological management, and minute/documentation of any concerns or questions for inclusion in a finalised version of the report. Noel King Jnr requested that the client consider cultural monitoring during construction and that an unexpected finds procedure be added to the ACHA.
17-Oct-23	Outgoing	NTSCorp/Widjabul Wia-bal AC	Stacey Kennedy (EMM)	Matilda Vaughan and Noel King Jnr	Email	Email advising Widjabul Wia-bal Gurrmbil AC that the recommendations for cultural monitoring discussed in the draft ACHA meeting were provided to the client but they have not supported including the monitoring as a recommendation in the ACHA. The recommendation was not included due to the sensitivity of the construction program schedule and the need for efficient progression. It was also noted in the email that unexpected finds procedures (especially in relation to Ancestral Remains) are expected to be included in the conditions of the AHIP.

B.2 List of identified Aboriginal stakeholders in the region

Registration Order	Registration Date	Organisation/Person	Name
1	21/Jun/23	Widjabul Wia-bal Gurrmbil Aboriginal Corporation	Conor Wakefield (ntscorp)
2	3-Aug-23	Widjabul Wia-bal Gurrmbil Aboriginal Corporation	Noel King Jnr
3	3-Aug-23	Widjabul Wia-bal Gurrmbil Aboriginal Corporation	Chris Brown Jnr
4	3-Aug-23	Widjabul Wia-bal Gurrmbil Aboriginal Corporation	Aunty Queenie Speeding
5	3-Aug-23	Widjabul Wia-bal Gurrmbil Aboriginal Corporation	Jamal Roberts

B.3 Stage 1 – Notification and registration

Rohani Dutch

From: Geospatial Search Requests <GeospatialSearch@NNTT.gov.au>
Sent: Friday, 2 June 2023 2:59 PM
To: Rohani Dutch
Cc: Stacey Kennedy
Subject: RE: SR23/897 - Northern Rivers Flood Recovery Program - Blakebrook Public School - Request for information on local Aboriginal stakeholders - SR23/897 [SEC=OFFICIAL]

CAUTION: This email originated outside of the Organisation.

OFFICIAL

Your ref: E230091 **Our ref:** SR23/897

Dear Rohani Dutch,

Thank you for your search request, please find your results below.

Search Results

The results provided are based on the information you supplied and are derived from a search of the following Tribunal databases:

- Schedule of Native Title Determination Applications
- Register of Native Title Claims
- Native Title Determinations
- Indigenous Land Use Agreements (Registered and notified)

Results for overlapping native title matters in NSW:

Feature ID	Tenure	Cadastre Data As At	Feature Area SqKm	Overlapping Native Title	
2//DP859866	FREEHOLD	4/05/2023	0.0128	NNTT File Number	Name
				NCD2022/001	Widjabul Wia-Bal
				NI2022/002	Widjabul Wia-bal Goori naa Land Use Agreement ILUA

For more information about the Tribunal's registers or to search the registers yourself and obtain copies of relevant register extracts, please visit our [website](#).

Information on native title claims and freehold land can also be found on the Tribunal's website here: [Native title claims and freehold land](#).

Please note: There may be a delay between a native title determination application being lodged in the Federal Court and its transfer to the Tribunal. As a result, some native title determination applications recently filed with the Federal Court may not appear on the Tribunal's databases.

The search results are based on analysis against external boundaries of applications only. Native title applications commonly contain exclusions clauses which remove areas from within the external boundary. To determine whether the areas described are in fact subject to claim, you need to refer to the "Area covered by claim" section of the relevant Register Extract or Schedule Extract and any maps attached.

Search results and the existence of native title

Please note that the enclosed information from the Register of Native Title Claims and/or the Schedule of Applications is **not** confirmation of the existence of native title in this area. This cannot be confirmed until the Federal Court makes a determination that native title does or does not exist in relation to the area. Such determinations are registered on the National Native Title Register.

The Tribunal accepts no liability for reliance placed on enclosed information

The enclosed information has been provided in good faith. Use of this information is at your sole risk. The National Native Title Tribunal makes no representation, either express or implied, as to the accuracy or suitability of the information enclosed for any particular purpose and accepts no liability for use of the information or reliance placed on it.

If you have any further queries, please do not hesitate to contact us via GeospatialSearch@NNTT.gov.au

Regards,

Geospatial Searches

National Native Title Tribunal | Perth

Email: GeospatialSearch@nntt.gov.au | www.nntt.gov.au

From: Rohani Dutch <rdutch@emmconsulting.com.au>

Sent: Friday, 2 June 2023 11:10 AM

To: Geospatial Search Requests <GeospatialSearch@NNTT.gov.au>

Cc: Stacey Kennedy <skennedy@emmconsulting.com.au>

Subject: SR23/897 - Northern Rivers Flood Recovery Program - Blakebrook Public School - Request for information on local Aboriginal stakeholders

Caution: This is an external email. DO NOT click links or open attachments unless you recognise the sender and know the content is safe.

To whom it may concern,

I apologise for my request, and acknowledge your terms and conditions in relation to cultural heritage in NSW. However, until Heritage NSW remove the Native Title Tribunal from their current guidelines, I must request a search of the study area to comply with them as part of an Aboriginal cultural heritage assessment. As such, please find a request for information on Lot 2/DP859866 in Blakebrook NSW.

Kind regards,

Rohani

Rohani Dutch

Graduate Archaeologist

Bushfire, Ecology, Heritage and Spatial Solutions

SYDNEY | Gamaraigal Country, Ground floor, 20 Chandos Street, St Leonards NSW 2065



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20 June 2023

Re Invitation for Registrations of Interest - Aboriginal Cultural Heritage - Northern Rivers Flood Recovery Program - Blakebrook Public School

Dear Sir/Madam,

School Infrastructure New South Wales on behalf of the Department of Education propose to rebuild Blakebrook Public School, one of nine schools in the Northern Rivers region of NSW significantly affected by the 2022 floods. The Blakebrook school buildings have been deemed unrepairable following an assessment of flood damage and are to be removed. A temporary school building has been established in the interim. The enabling works for this project are part of the Northern Rivers Flood Recovery Program. Blakebrook Public School is Lot 2/DP859866, located at 417 Rosehill Road, Blakebrook and comprises an area of approximately 1.26 hectares. The area has been previously cleared of vegetation and currently contains school grounds, historical tree plantings along the outer boundary and a complex of school buildings. The latter are to be demolished and new school facilities constructed with changes to be made to the school site on the northern and eastern sides.

ADCO Constructions on behalf of School Infrastructure has commissioned EMM Consulting Pty Ltd (EMM) to undertake an Aboriginal Cultural Heritage Assessment (ACHA) to identify the presence of any Aboriginal heritage values and to avoid, minimise, mitigate and/or manage impacts to Aboriginal heritage resulting from the project. The ACHA will support assessment under Part 4 of the *Environmental Planning and Assessment Act 1979*.

The proponent contact is:

Tania Crosbie (Community Engagement)
School Infrastructure New South Wales
E: Tania.Crosbie@det.nsw.edu.au
T: 0499 850 614

This project is being undertaken in accordance with NSW State government's *Aboriginal cultural heritage consultation requirements for proponents 2010*. As per the first stage of the NSW State government consultation guidelines, I am writing to notify you of the project and seeking you and/or your organisation's interest in being registered for subsequent consultation and involvement. We are interested in Aboriginal individuals and/or organisations who may hold relevant cultural knowledge for determining the Aboriginal cultural heritage of the area, and who wish to be involved in the project.

The purpose of consultation is to assist the proponent to:

1. Assess the Aboriginal heritage values of the area.
2. Assist NSW Government in the assessment of Aboriginal heritage reports prepared for this project.

3. Support any future applications or approvals for the project sought under *Environmental Planning and Assessment Act 1979* and/or *National Parks and Wildlife Act 1974*.

If you wish to register your interest as an Aboriginal party in subsequent consultation, please contact Stacey Kennedy at the below details by **COB 4 July 2023**.

Stacey Kennedy
EMM Consulting Pty Ltd
20 Chandos Street
St Leonards, NSW, 2065
E: skennedy@emmconsulting.com.au
T: 07 3648 1266

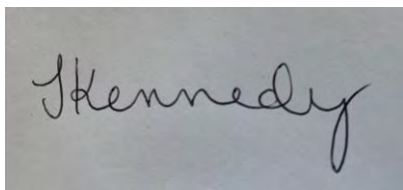
In your response, please provide the following information:

- Clear identification of the individual and/or organisation registering an interest. Please ensure all individuals and/or organisations registering provide their contact details including relevant phone, address and e-mail (if available).
- Preferred communication method (e.g. e-mail) during the consultation of this project, along with your organisation's nominated contact person and their details.
- The level of project involvement you or your organisation wishes, including attendance of meetings, fieldwork participation and/or simply reviewing documentation.
- Identification on any procedures, protocols or requirements for the use and reproduction of any cultural information or materials you or your organisation provides EMM as part of this project.
- Identification of any Aboriginal objects, sites and/or areas of cultural value that you are aware of in, or near, the project area.

As required by the consultation guidelines, details of people registering as Aboriginal Parties will be forwarded to Heritage NSW and the relevant Local Aboriginal Land Council unless you specify otherwise in your response.

If you have any questions or enquiries, please don't hesitate to contact us.

Yours sincerely,

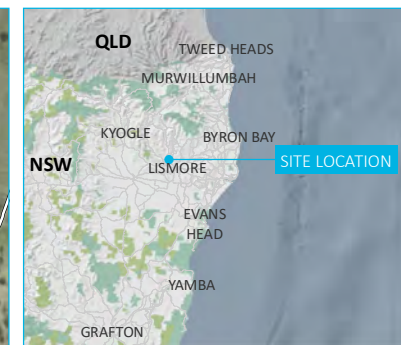
A handwritten signature in black ink on a light grey background. The signature is written in a cursive, flowing style and reads 'Stacey Kennedy'.

Stacey Kennedy
Associate Technical Lead - Aboriginal Heritage
skennedy@emmconsulting.com.au

\\lemmsvr1\EMM\2022\EMM202779 - HH SINSW Flood recovery\2. E220871 Blakebrook P\5. GIS\02 Maps\G001 GeographicalContext 20220913 01.mxd 24/11/2022



Source: EMM (2022); ABS (2021); DFSI (2017, 2020); Metromap (2022); GA (2011)



- KEY**
- Site boundary
 - Major road
 - Minor road
 - Vehicular track
 - Named watercourse
 - Named waterbody
- INSET KEY**
- Major road
 - NPWS reserve
 - State forest

Regional setting and local setting

Blakebrook Public School
Aboriginal due diligence assessment
Figure 1.1



Mikhaila Chaplin

From: Matilda Vaughan <mvaughan@ntscorp.com.au>
Sent: Thursday, 3 August 2023 3:22 PM
To: Mikhaila Chaplin
Cc: Nicolas Reilly; Stacey Kennedy
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

CAUTION: This email originated outside of the Organisation.

Hi Mikhaila,

Thank you for your email and my apologies for the delay in getting back to you.

Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC would like to nominate the following individuals for the survey:

1. Noel King Jnr – 0457 003 250, nkbj2211@live.com
2. Chris Brown Jnr – 0412 669 981
3. Jamal Roberts – 0497 092 981
4. Aunty Queenie Speeding – 0455 476 909, queenie.speeding@gmail.com

Please let me know if I can be of any further assistance.

Kind regards,

Matilda Vaughan | Senior Solicitor



NTSCORP proudly acknowledge that our office is situated on the country of the Gadigal People. We also acknowledge and pay our respect to their Elders past and present.

t 61 2 9310 3188 | m 0429 668 850
e mvaughan@ntscorp.com.au | w www.ntscorp.com.au
Level 1, 44-70 Rosehill Street, Redfern, NSW 2016 Australia

NTSCORP is committed to supporting local
Aboriginal businesses where possible through
the purchase of goods and services.

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From: Mikhaila Chaplin <mchaplin@emmconsulting.com.au>
Sent: Thursday, August 3, 2023 2:20 PM
To: Conor Wakefield <cwakefield@ntscorp.com.au>; Matilda Vaughan <mvaughan@ntscorp.com.au>
Cc: Nicolas Reilly <nreilly@emmconsulting.com.au>; Stacey Kennedy <skennedy@emmconsulting.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

Some people who received this message don't often get email from mchaplin@emmconsulting.com.au. [Learn why this is important](#)

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Hi Conor and Matilda,

Just following up regarding the upcoming fieldwork at Blakebrook Public School and if there are four site officers available from your organisation for a period of 3 days **(14 - 16 Aug)**.

Further details are below in Stacey's email but please give me a call if easier on 0456 298 625.

We look forward to hearing from you.

Mikhaila

Mikhaila Chaplin

Archaeologist | Bushfire, Ecology, Heritage and Spatial Solutions



T 02 9493 9500
M 0456 298 625
LI [Connect on LinkedIn](#)
emmconsulting.com.au

SYDNEY | Gamaraigal Country, Ground floor, 20 Chandos Street, St Leonards NSW 2065



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From: Stacey Kennedy <skennedy@emmconsulting.com.au>
Sent: Thursday, July 27, 2023 4:18 PM
To: Conor Wakefield <cwakefield@ntscorp.com.au>
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>; Mikhaila Chaplin <mchaplin@emmconsulting.com.au>; Nicolas Reilly <nreilly@emmconsulting.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

Hello Conor,

We are aiming to undertake field assessment of the site for the Blakebrook School on Monday 14/08/2023, Tuesday 15/08/2023 and Wednesday 16/08/2023. As per previous discussions, we are seeking Wia-bal Gurrmbil Aboriginal

Corporation's involvement in these on-site activities. A formal work scope is outlined below outlining requirements, payment, etc.

Requirements and details (work scope)

We are seeking four site officers from your organisation for a period of 3 days. The works will include a walkover of the site (pedestrian survey) and test excavations. This is being completed to identify Aboriginal objects (eg stone artefacts, scarred trees, hearths, etc), discuss the cultural values of the site, and work with our archaeologists to document them for reporting requirements.

We are authorised to pay up to **\$130 ex GST per hour** for each representative for a period of up to 8 hours per day of attendance..

At completion of the works, please provide an invoice to myself at EMM with the title 'Northern Rivers Recovery Project – Blakebrook: ACH activities' and we'll submit it for processing. Typically, we pay within three weeks of receipt of invoice, but timeframes of longer than this may occur during busy times.

Please find attached our subconsultant agreement for review and signature. If you have any issues or modifications, please contact us and we are happy to discuss and consider them.

Please note we will require copies of your WHS or equivalent White Cards, workers compensation/personal accident and public liability insurance.

Please note:

- Please ensure your site officers have all necessary safety gear (steel toecaps, hi-vis, long sleeves/pants, rain jacket, sun hat, safety glasses/sunglasses) for a day in the field. Please bring wet weather gear in case we do get some rain while on site.
- There may be limited shops where we are working so please bring lots of food and water for yourself for the day.

If you have any questions or would like to discuss further please do not hesitate to contact me.

Kind regards,

Stacey Kennedy

Associate / Technical Lead, Aboriginal Heritage

T 07 3648 1200

M 0408 597 246

www.emmconsulting.com.au

From: Conor Wakefield <cwakefield@ntscorp.com.au>

Sent: Monday, July 17, 2023 9:06 AM

To: Stacey Kennedy <skennedy@emmconsulting.com.au>

Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>

Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

CAUTION: This email originated outside of the Organisation.

Hi Stacey,

Thanks for the update. We'd be grateful if you could provide a further update once the details of the cultural heritage survey are organised so that the Wia-bal Gurrmbil Aboriginal Corporation can nominate cultural heritage monitors to participate in the survey.

Kind regards,

Conor Wakefield | Solicitor



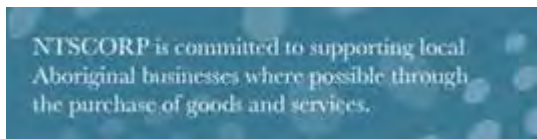
NTSCORP proudly acknowledge that our office is situated on the country of the Gadigal People. We also acknowledge and pay our respect to their Elders past and present.

t 61 2 9310 3188 **f** 02 9310 4177

m 0498 980 212

e: cwakefield@ntscorp.com.au | **w** www.ntscorp.com.au

Level 1, 44-70 Rosehill Street, Redfern, NSW 2016 Australia



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From: Stacey Kennedy <skennedy@emmconsulting.com.au>

Sent: Monday, July 17, 2023 9:04 AM

To: Conor Wakefield <cwakefield@ntscorp.com.au>

Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>

Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

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Hi Conor,

Apologies for my delayed response! Yes it is anticipated that Aboriginal cultural heritage monitors will participate in the archaeological field survey/testing referred to in the methodology, and we hope to be on site in mid-August. I am currently working out the details of how many monitors and rates of payment with the client.

I hope to be able to get back to you very soon with further details.

Kindest regards,

Stacey Kennedy

Associate / Technical Lead, Aboriginal Heritage

T 07 3648 1200

M 0408 597 246

www.emmconsulting.com.au

From: Conor Wakefield <cwakefield@ntscorp.com.au>

Sent: Monday, July 17, 2023 8:58 AM

To: Stacey Kennedy <skennedy@emmconsulting.com.au>

Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>

Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

CAUTION: This email originated outside of the Organisation.

Hi Stacey,

Just following up on the below query.

Kind regards,

Conor Wakefield | Solicitor



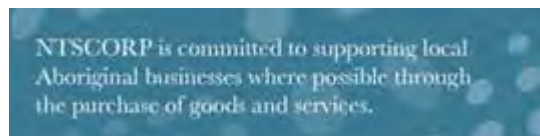
NTSCORP proudly acknowledge that our office is situated on the country of the Gadigal People. We also acknowledge and pay our respect to their Elders past and present.

t 61 2 9310 3188 **f** 02 9310 4177

m 0498 980 212

e: cwakefield@ntscorp.com.au | **w** www.ntscorp.com.au

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From: Conor Wakefield
Sent: Monday, July 10, 2023 9:36 AM
To: Stacey Kennedy <skennedy@emmconsulting.com.au>
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

Hi Stacey,

Thank you for confirming that the Widjabul Wia-bal Gurrmbil Aboriginal Corporation RNTBC will be exclusively consulted regarding the ACHA.

Please direct future correspondence to myself and Tilly Vaughan (copied to this email).

Could you please clarify whether Aboriginal cultural heritage monitors nominate by the Widjabul Wia-bal Gurrmbil Aboriginal Corporation RNTBC will be participating in the archaeological field survey referred to at 4.2 of the methodology, and if so, how many Aboriginal cultural heritage monitors will be engaged and what rate they will be paid?

Kind regards,

Conor Wakefield | Solicitor



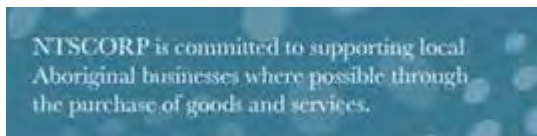
NTSCORP proudly acknowledge that our office is situated on the country of the Gadigal People. We also acknowledge and pay our respect to their Elders past and present.

t 61 2 9310 3188 **f** 02 9310 4177

m 0498 980 212

e: cwakefield@ntscorp.com.au | **w** www.ntscorp.com.au

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Please consider the environment before printing this email

From: Stacey Kennedy <skennedy@emmconsulting.com.au>
Sent: Friday, July 7, 2023 3:33 PM
To: Conor Wakefield <cwakefield@ntscorp.com.au>
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

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Hi Conor,

Thank you for your emails below. We understand that Widjabul Wia-bal Gurrmbil Aboriginal Corporation is the Registered Native Title Body Corporate (RNBTC) established by Widjabul Wia-bal. We note and register their interest in the project and that we will be consulting with them exclusively for the Blakebrook ACHA.

Could you please let me know how Widjabul Wia-bal Gurrmbil Aboriginal Corporation would like to be consulted with moving forward, should all communication be directed to you in the first instance?

I have attached to this email a letter which provides more detail on the project and our proposed approach to the archaeological investigation. We are seeking feedback on the methodologies proposed and invite Widjabul Wia-bal Gurrmbil Aboriginal Corporation to provide information on any cultural values (which might include archaeological sites or other types of values) relevant to the study area and its surrounds should they wish to do so.

If you require any further information please do not hesitate to contact me.

Kind regards,

Stacey Kennedy

Associate / Technical Lead, Aboriginal Heritage

T 07 3648 1200

M 0408 597 246

www.emmconsulting.com.au

From: Conor Wakefield <cwakefield@ntscorp.com.au>
Sent: Thursday, June 29, 2023 9:08 AM
To: Stacey Kennedy <skennedy@emmconsulting.com.au>; Rohani Dutch <rdutch@emmconsulting.com.au>
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

CAUTION: This email originated outside of the Organisation.

Hi Stacey,

Further to the below, we have received a further ACHA notification for this project (**attached**).

Please note the comments below regarding this project and the Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC.

Kind regards,

Conor Wakefield | Solicitor



NTSCORP proudly acknowledge that our office is situated on the country of the Gadigal People. We also acknowledge and pay our respect to their Elders past and present.

t 61 2 9310 3188 f 02 9310 4177

m 0498 980 212

e: cwakefield@ntscorp.com.au | w www.ntscorp.com.au

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Please consider the environment before printing this email

From: Conor Wakefield
Sent: Wednesday, June 21, 2023 4:13 PM
To: skennedy@emmconsulting.com.au; rdutch@emmconsulting.com.au
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>
Subject: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

Dear Stacey,

Thank you for providing the **attached** notice.

I provide this email by way of background in relation to:

- (a) The Widjabul Wia-bal Consent Determination;
- (b) The Widjabul Wia-bal Goori naa Land Use Agreement ILUA
- (c) The Widjabul Wia-bal Gurrmbil Aboriginal Corporation RNTBC

In December 2022, the Widjabul Wia-bal native title determination application was resolved by the Widjabul Wia-bal Consent Determination, available online here: <https://www.judgments.fedcourt.gov.au/judgments/Judgments/fca/single/2022/2022fca1521>.

The Widjabul Wia-bal Consent Determination officially recognises Widjabul Wia-bal people as the traditional owners of Widjabul Wia-bal Country.

The Widjabul Wia-bal Gurrmbil Aboriginal Corporation is the Registered Native Title Body Corporate (RNBTC) established by Widjabul Wia-bal to hold native title rights and interests and to progress Widjabul Wia-bal's interests. NTSCORP Ltd is the legal representative of the Widjabul Wia-bal Gurrmbil Aboriginal Corporation.

The Widjabul Wia-bal Goori naa Land Use Agreement ILUA sets out processes for the protection of, and engagement about, cultural heritage within Widjabul Wia-bal Country. An extract of the ILUA is available here: <http://www.nntt.gov.au/searchRegApps/NativeTitleRegisters/ILUA%20Register/2022/NI2022.002/ILUARegisterExport.pdf>

The consultation requirements in relation to Aboriginal Heritage Impact Permits are found in Regulation 60 of the [National Parks and Wildlife Regulation 2019 \(NPWR\)](#). Where native title has been determined to exist, regulation 60(3) of the NPWR applies such that the Proponent may consult with the RNTBC for that land, rather than following the process in regulation 60(2). Moreover, where a modified Aboriginal community consultation process is set out in a registered ILUA, Proponents are to carry out that process, in accordance with regulation 60(10) of the NPWR. Schedule E of the ILUA sets out a modified Aboriginal community consultation process that satisfies sub-regulations 60(1) and 60(10) of the NPWR. Accordingly, the Widjabul Wia-bal Gurrmbil Aboriginal Corporation should be exclusively consulted in relation to ACHAs prepared in conjunction within Widjabul Wia-bal Country. We encourage you to contact Heritage NSW for more information as to the operation of Schedule E of the ILUA.

In relation to this project, we note that Widjabul Wia-bal Gurrmbil Aboriginal Corporation should be exclusively consulted.

Kind regards,

Conor Wakefield | Solicitor



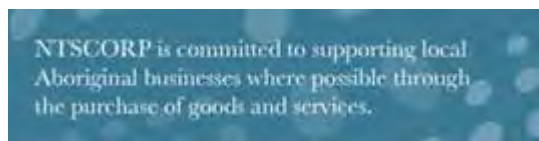
NTSCORP proudly acknowledge that our office is situated on the country of the Gadigal People. We also acknowledge and pay our respect to their Elders past and present.

t 61 2 9310 3188 **f** 02 9310 4177

m 0498 980 212

e: cwakefield@ntscorp.com.au | **w** www.ntscorp.com.au

Level 1, 44-70 Rosehill Street, Redfern, NSW 2016 Australia



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From: Rohani Dutch <rdutch@emmconsulting.com.au>

Sent: Friday, June 2, 2023 1:05 PM

Cc: Stacey Kennedy <skennedy@emmconsulting.com.au>

Subject: Northern Rivers Flood Recovery Program - Blakebrook Public School - Request for information on local Aboriginal stakeholders

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To whom it may concern,

EMM Consulting Pty Ltd is undertaking an Aboriginal cultural heritage assessment of the proposed rebuilding of Blakebrook Public School, one of nine schools in the Northern Rivers region of NSW significantly affected by the 2022 floods. A letter attached provides further information.

I am writing to request contact information for local Aboriginal people you may be aware of who would be interested in the project, in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

Please let me know if I can provide any further information to assist you.

Kind regards,

Rohani

Rohani Dutch

Graduate Archaeologist

Bushfire, Ecology, Heritage and Spatial Solutions



T 02 9493 9500

M 0459 353 013

 Connect with us

SYDNEY | Gamaraigal Country, Ground floor, 20 Chandos Street, St Leonards NSW 2065



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B.4 Stages 2 and 3 – presentation of information and gathering cultural information

7 July 2023

Re: Northern Rivers Recovery Project: Broadwater Public School - project information and assessment methodology

Dear Sir/Madam ,

1 Introduction

Thank you for your interest in the proposed Northern Rivers Recovery Project: Blakebrook Public School (the project).

School Infrastructure New South Wales on behalf of the Department of Education propose to rebuild Blakebrook Public School, one of nine schools in the Northern Rivers region of NSW significantly affected by the 2022 floods.

The Blakebrook school buildings have been deemed unrepairable following an assessment of flood damage and are to be removed. A temporary school building has been established in the interim. The enabling works for this project are part of the Northern Rivers Flood Recovery Program. Blakebrook Public School is Lot 2/DP859866, located at 417 Rosehill Road, Blakebrook and comprises an area of approximately 1.26 hectares. The area has been previously cleared of vegetation and currently contains school grounds, historical tree plantings along the outer boundary and a complex of school buildings. The latter are to be demolished and new school facilities constructed with changes to be made to the school site on the northern and eastern sides.

ADCO Constructions on behalf of School Infrastructure has commissioned EMM Consulting Pty Ltd (EMM) to undertake an Aboriginal Cultural Heritage Assessment (ACHA) to identify the presence of any Aboriginal heritage values and to avoid, minimise, mitigate and/or manage impacts to Aboriginal heritage resulting from the project. The ACHA will support assessment under Part 4 of the *Environmental Planning and Assessment Act 1979*.

This document forms part of the formal Aboriginal consultation requirements for the project, as described in Sections 4.2 (Stage 2) and 4.3 (Stage 3) of the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010).

The aims of this letter are to:

- provide an overview of the project and how it will be assessed
- provide background on the project and some of the initial investigations to date
- establish the purpose and aims of the Aboriginal consultation process

- seek information about any Aboriginal cultural heritage values and sensitivities associated with the project and how they may affect, inform or refine the project and/or assessment methods
- seek information on any cultural activities (such as fishing and hunting) that has historically and/or is actively being undertaken in the study area
- identify any culturally appropriate protocols that registered parties wish to be adopted during the information gathering process (e.g., protocols during fieldwork, or handling of culturally sensitive information)
- present a draft of the intended assessment methods for your review and comment.

We welcome your feedback at your earliest convenience. We will be consulting with the registered Aboriginal parties for the duration of the Aboriginal cultural heritage assessment (ACHA), currently proposed to extend to the end of 2023. However, for the purposes of this initial stage of consultation and in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010), we request any written response on the information and process included below by **4 August 2023** (28 days from date of distribution).

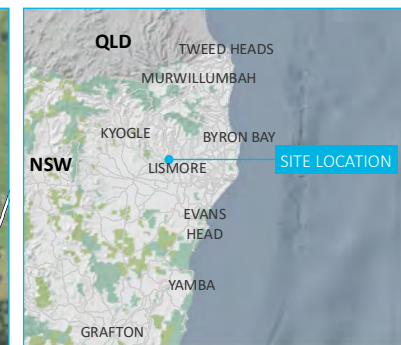
For reference, the proponent contact is:

Tania Crosbie (Community Engagement)
School Infrastructure New South Wales
E: Tania.Crosbie@det.nsw.edu.au
T: 0499 850 614

EMM is working on the applicant's behalf, and all queries should be directed through EMM. Feedback can be provided to:

Stacey Kennedy
EMM Consulting Pty Ltd
20 Chandos Street
St Leonards, NSW, 2065
E: skennedy@emmconsulting.com.au
T: 07 3648 1266

\\lemmsvr1\EMM2\2023\E230642 - Northern Rivers Recovery Project Stage 2\GIS\02 Maps\ Blakebrook\ACHA001_RegionalSetting_20230623_01.mxd 23/06/2023



- KEY**
- Site boundary
 - Major road
 - Minor road
 - Vehicular track
 - Named watercourse
 - Named waterbody

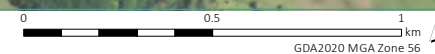
- INSET KEY**
- Major road
 - NPWS reserve
 - State forest

Regional and local setting

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 1.1



Source: EMM (2023); ABS (2021); DFSI (2017, 2020); Metromap (2023); GA (2011)



2 Project information

2.1 Overview

ADCO Constructions on behalf of School Infrastructure has commissioned EMM Consulting Pty Ltd (EMM) to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for the Blakebrook Public School. The Blakebrook school buildings have been deemed unrepairable following an assessment of flood damage and are to be removed.

2.2 Project elements

A masterplan has been created to relocate and replace flood damaged buildings within contemporary new learning and admin spaces. Other key objectives are to improve overall site planning and relationships, to retain the existing community and heritage value of the school and ensure provision of future protection against flood risk. The master planning will rebuild to the same number and type of spaces previously provided for each school.

It is anticipated that the physical layout and design of the project will comprise the following key elements:

- Demolition of existing structures damaged by floodwaters.
- Installation/upgrade of utilities and services (where required).
- Construction of the following:
 - Admin and staff space
 - Library
 - Canteen
 - General learning spaces
 - Amenities
 - Storage
 - Play spaces
 - Yarning circle
- Site access – including carpark

2.3 Previous investigations

EMM completed a desktop due diligence assessment in 2022 for the Blakebrook Public School. The assessment concluded that the project area has moderate archaeological sensitivity, and Aboriginal objects may occur in either a disturbed or intact state. The subject site has been significantly altered over time through land clearance, agricultural use and construction activity associated with the school. However, subsurface disturbance associated with these activities is not considered likely to have impacted the soils to depths that would completely destroy archaeological deposits. Furthermore, although at a remove from positions of the highest archaeological potential on landforms and watercourses more favourable for occupation, the area is still favourable for occupation from several perspectives.

3 Aboriginal stakeholder engagement

In accordance with the consultation process, EMM contacted a number of State and Commonwealth government organisations to provide information on Aboriginal individuals and organisations known to participate in cultural heritage management in the relevant LGAs. This was undertaken in June 2023. EMM were notified on 29 June 2023 that the Widjabul Wia-bal Consent Determination officially recognises Widjabul Wia-bal people as the traditional owners of Widjabul Wia-bal Country.

The Widjabul Wia-bal Gurrmbil Aboriginal Corporation is the Registered Native Title Body Corporate (RNBTC) established by Widjabul Wia-bal to hold native title rights and interests and to progress Widjabul Wia-bal's interests, and NTSCORP Ltd is the legal representative of the Widjabul Wia-bal Gurrmbil Aboriginal Corporation.

Following this notification process Widjabul Wia-bal Gurrmbil Aboriginal Corporation have expressed an interest in being involved in the project and will be the only stakeholder consulted with.

In accordance with Heritage NSW guidelines, these stakeholders are referred to as Registered Aboriginal Parties (RAPs) in subsequent documentation and communication for the project.

The roles, functions and responsibilities of all stakeholders involved in the consultation process are outlined in Table 3.1.

Table 3.1 **Roles, functions and responsibilities**

RAPs	<p>Provide cultural perspectives, views, knowledge and advice to EMM.</p> <p>Indicate areas of cultural significance.</p> <p>Provide Aboriginal sites representatives for archaeological fieldwork (if desired, and representatives are suitably qualified and insured).</p> <p>Have an awareness and understanding of the commercial environment and constraints in which the applicant operates.</p> <p>Demonstrate awareness and understanding of the opportunities to provide input into the ACHA and management recommendations for the continued design, construction and operation of the project.</p> <p>Identify, raise, and discuss cultural concerns, perspectives and assessment requirements (if any).</p>
EMM	<p>Undertake the ACHA in accordance with the relevant policies, legislation and guidelines, including coordinating and directing the fieldwork.</p> <p>Facilitate the Aboriginal consultation process.</p> <p>Consider the cultural perspectives, views, knowledge and advice of the RAPs in assessing cultural significance and developing management measures.</p> <p>Provide clear management measures that comply with relevant legislation, guidelines and significance.</p>
All stakeholders	<p>Mutual respect (each person has the right to have a say and be heard).</p> <p>Communicate in a professional manner.</p>

4 Assessment methodology

4.1 Overview

The ACHA will support assessment under Part 5 of the *Environmental Planning and Assessment Act 1979*. The *Environmental Planning and Assessment Act 1979* (EP&A Act) establishes the framework for cultural heritage values to be formally assessed in the planning and development consent process. The EP&A Act requires that environmental impacts are considered before land development and includes impacts on cultural heritage items and places as well as archaeological sites and deposits. The EP&A Act also requires that local governments prepare planning instruments, such as Local Environmental Plans (LEPs) and Development Control Plans (DCPs) to provide guidance at the local level of environmental assessment required, it also includes a range of planning instruments that can include Aboriginal objects, sites and places, although these would still generally be managed under the *National Parks and Wildlife Act 1974*.

The ACHA will undertake an assessment of impacts to Aboriginal cultural heritage items and be prepared for the project in accordance with the Heritage NSW guidelines. These typically include:

- *National Parks and Wildlife Act 1974*
- *Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW* (the Code of Practice) (DECCW 2010a);
- *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (DECCW 2010b); and
- *Aboriginal Consultation Requirements for Proponents 2010* (DECCW 2010c).

The purpose of the ACHA is to describe any Aboriginal cultural heritage sites and values within the study area, identify the potential impacts that the project may have on these sites and values, and detail mitigation measures for the avoidance, minimisation and management of any impacts to identified Aboriginal cultural heritage sites and values. The preparation of the ACHA will involve:

- Consultation with RAPs to identify socio-cultural values of the project study area and places of special significance that should be considered.
- A review of past Aboriginal heritage reports near the project area to further understand the location, nature and survivability of cultural materials in a given area, and how this may extrapolate into the project area.
- A review of the existing environment and environmental characteristics of the project footprint to identify past Aboriginal resources and suitable occupation areas. The presence of certain landforms and landscapes are critical in determining the potential presence of Aboriginal cultural materials (e.g. proximity to water), while the last 200 years of activity often have resulted in disturbance and loss of such materials. This review will provide an understanding of both the current conditions, but also the historical evolution of the project area.
- Archaeological field survey to ground-truth the predictive model, and to identify previously documented and undocumented cultural heritage.
- Archaeological test excavation of areas of potential archaeological deposits (PAD) and based on the findings of the archaeological survey and existing information (Figure 4.1).
- An assessment of significance for Aboriginal cultural heritage sites values in the project area (with input from the registered Aboriginal parties).
- An assessment of the potential impacts that construction and operation of the project may affect Aboriginal cultural heritage sites and values in the project area.

- Development of mitigation measures based on the results of the impact assessment and input from registered Aboriginal parties during the consultation process and particularly from the draft ACHA review period. The mitigation measures would detail how the project would aim to avoid, minimise and manage the potential impacts of the project on Aboriginal cultural sites and values in the project area.

4.2 Archaeological field survey

Archaeological field survey of the study area will be undertaken to identify any extant Aboriginal objects or sites and cultural values present. Field survey will be completed across the entire study area.

Surface investigation will consist of the survey team being evenly spaced (5-10 m apart) and walking transects across accessible parts of the study area.

The focus of the archaeological field survey will be to both investigate soil exposures for extant Aboriginal objects and identify landforms that have potential for cultural material to be present (either in surface or subsurface deposits). All Aboriginal objects and/or landforms of interest would be mapped and documented using hand-held GPS, photographs, sketches and/or written description.

Where possible, a significant focus of the survey will be to discuss intangible values associated with the project study area, such as connection to other cultural places, stories, view-lines, contemporary values, etc.

The archaeological field survey will be undertaken in accordance with Requirements 5 to 10 of the Code of Practice. In summary, the Code of Practice requires the following general methodology:

- Pedestrian survey of the project study area.
- Recording of beginning and end points of transects or the boundaries of survey units, and the spacing between survey personnel.
- Recording of landform, soil information, land surface, vegetation conditions, visibility and exposure, and survey coverage.
- Recording of any identified Aboriginal sites identified according to Requirements 6-8, and recording of any identified Aboriginal objects in accordance with Requirements 18-24 of the Code of Practice. This would include the spatial location, photographs and sketches, and written description of any identified sites, such as culturally modified trees, artefact sites, etc.
- If any Aboriginal objects and/or sites are identified in the course of the survey, site cards will be completed and submitted to the AHIMS registrar.
- In the event of Aboriginal heritage being identified within the project footprint, undertake discussions on site as to the potential further investigation and/or management of these finds. Where sites are considered of high archaeological and/or cultural value, further characterisation, consideration of avoidance and re-design would be explored with the registered Aboriginal parties. Appropriate mitigation measures would be developed in consultation with the Registered Aboriginal Parties and Heritage NSW for any potential unavoidable impacts.

4.3 Test excavations

The project has potential to disturb ground that intersects with landform/s where buried cultural material is considered probable (Figure 4.1). Areas which are considered to have potential for Aboriginal heritage that intersect with the proposed development footprint would be subject to test excavations. The test excavations would consist of the following approach and methods:

All test excavations would adopt the Heritage NSW Code of Practice methods, and include the following:

- All test excavation pits would be spatially located using a differential GPS device, which would also provide elevation data.
- Manual excavation of 0.25 m² (50 x 50 cm) test pits in a systematic grid across areas of archaeological interest within the impact footprint. The spatial resolution of the grid would be dependent on on-ground conditions but would typically have test pits between 20 m apart, with high resolution in areas of identified cultural materials and/or high potential, with lower resolution in areas of moderate potential. Additional in-filling of this initial grid of test pits and/or the expansion of test pits (up to 3 m²) may be undertaken to further resolve any uncertainties about the cultural deposits or where deep deposits are encountered.
- Excavation would use hand tools. Excavation of the first unit would be in 5 cm spits, with subsequent excavation allowed in 10 cm spits or according to stratigraphy (whichever is smallest) depending on the results of the first unit. Manual excavation would continue to either: i) the base of the cultural deposits; ii) to the depth of the underlying geology; or iii) to the maximum depth possible via hand excavation (likely ~50 cm);
- Sieving of all manually excavated material through a 5 mm sieve.
- Reduced levels of the top and bottom of the test pit would be documented using a dumpy level against a known elevation. Other levels may be taken as required.
- Soil profiles would be recorded in accordance with the Code of Practice, including scaled drawings, photographs, and written descriptions.
- Soil samples may be collected for description, sedimentological and chronological analysis where such analysis is considered likely to contribute significant information. Excavation procedures and protocols may be modified at the discretion of the Excavation Director, in consultation with the registered Aboriginal parties and the proponent as the conditions in the field and nature of the excavations develop. This includes the movement of test pits to avoid existing built structures, buried services and disturbances not identified during the desktop phase.

Historical archaeological investigations may also need to be completed for the project and where possible these will be run concurrently. Any historical trenches will be monitored for Aboriginal objects and/or deposits, and if Aboriginal materials are found the test pit would be excavated as part of the ACHA program. All deposits will be sieved, and all artefacts bagged and analysed in line with the methodology provided above, dependent on approval from the historical archaeologists (i.e. there are no significant historical features we need to avoid excavating through).

4.4 Timeframes

The following indicative timeframes would apply:

- Distribution of this document to registered Aboriginal stakeholders: **7 July 2023**
- Field survey/test excavations of the study area: commence **mid August 2023**
- Distribution of the draft ACHA report for RAP review and comment: September 2023
- Input into recommendations and review of draft report by RAPs: September/October 2023; and
- Report finalisation: September/October 2023.

\\lemmsvr1\EMM2\2023\230642 - Northern Rivers Recovery Project Stage 2\GIS\02 Maps\ Blakebrook\ACHA002_TestPits_20230706_02.mxd 7/07/2023



- KEY
- Site boundary
 - Proposed test excavation
 - Major road
 - Vehicular track

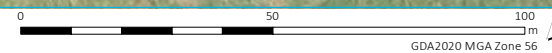
DRAFT

Proposed test excavations

Blakebrook Public School
Aboriginal Cultural Heritage Assessment
Figure 1.2



Source: EMM (2023); DFSI (2017, 2020); Metromap (2022)



5 What we need from you

In addition to the archaeological evidence described above, Aboriginal heritage incorporates a wide range of values such as stories, traditions and cultural practices. EMM welcomes advice from the Aboriginal community about cultural values (which might include archaeological sites or other types of values) relevant to the study area and its surrounds. EMM is relying on the Aboriginal community for advice on nonarchaeological and intangible Aboriginal values for the study area. We are happy to discuss any information which you are willing to share and will respect confidentiality where requested.

EMM would appreciate your feedback on the above methodology proposed for the investigation and assessment of the study area. In responding, please also consider the following questions:

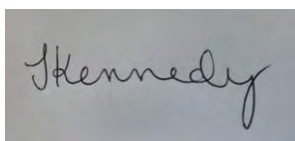
- Are there any other knowledge-holders or traditional owner groups we should be contacting to obtain cultural information on this area?
- Are there any protocols in relation to community interaction and/or cultural heritage that you would like adopted during the project?
- Are you aware of any Aboriginal objects, places, sites or stories of cultural significance and/or importance that you are aware of within the study area? If so, please advise us how you wish them to be dealt with during the project.
- Are you aware of any past or current fishing and hunting activities within the project study area? Do you have any views on how these should be managed into the future?
- Is the information you are providing sensitive, gender specific, etc? If so, how would you like the information you provide to EMM to be managed? Noting that some documentation for the ACHA process will be required.
- Do you require any further information prior to EMM proceeding with the ACHA investigations?
- In your response, can you please also clearly identify who you would like EMM to talk to within your organisation, and provide contact details for these individuals. Please also ensure your preferred method of communication (eg telephone call, e-mail, letter etc) is highlighted for subsequent stages of the project.

6 Closing

We look forward to receiving any response your organisation wishes to make about the proposed method by **4 August 2023** (28 days from distribution). Your response will be documented and considered in the assessment. Most importantly, your cultural information is also welcome within this timeframe; but it can also be submitted up until the completion of the draft ACHA.

Please feel free to contact me with any questions.

Yours sincerely



Stacey Kennedy

Associate / Technical Lead

skennedy@emmconsulting.com.au

Mikhaila Chaplin

From: Matilda Vaughan <mvaughan@ntscorp.com.au>
Sent: Thursday, 3 August 2023 3:22 PM
To: Mikhaila Chaplin
Cc: Nicolas Reilly; Stacey Kennedy
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

CAUTION: This email originated outside of the Organisation.

Hi Mikhaila,

Thank you for your email and my apologies for the delay in getting back to you.

Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC would like to nominate the following individuals for the survey:

1. Noel King Jnr – 0457 003 250, nkbj2211@live.com
2. Chris Brown Jnr – 0412 669 981
3. Jamal Roberts – 0497 092 981
4. Aunty Queenie Speeding – 0455 476 909, queenie.speeding@gmail.com

Please let me know if I can be of any further assistance.

Kind regards,

Matilda Vaughan | Senior Solicitor



NTSCORP proudly acknowledge that our office is situated on the country of the Gadigal People. We also acknowledge and pay our respect to their Elders past and present.

t 61 2 9310 3188 | m 0429 668 850
e mvaughan@ntscorp.com.au | w www.ntscorp.com.au
Level 1, 44-70 Rosehill Street, Redfern, NSW 2016 Australia

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From: Mikhaila Chaplin <mchaplin@emmconsulting.com.au>
Sent: Thursday, August 3, 2023 2:20 PM
To: Conor Wakefield <cwakefield@ntscorp.com.au>; Matilda Vaughan <mvaughan@ntscorp.com.au>
Cc: Nicolas Reilly <nreilly@emmconsulting.com.au>; Stacey Kennedy <skennedy@emmconsulting.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

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Hi Conor and Matilda,

Just following up regarding the upcoming fieldwork at Blakebrook Public School and if there are four site officers available from your organisation for a period of 3 days **(14 - 16 Aug)**.

Further details are below in Stacey's email but please give me a call if easier on 0456 298 625.

We look forward to hearing from you.

Mikhaila

Mikhaila Chaplin

Archaeologist | Bushfire, Ecology, Heritage and Spatial Solutions



T 02 9493 9500
M 0456 298 625
LI [Connect on LinkedIn](#)
emmconsulting.com.au

SYDNEY | Gamaraigal Country, Ground floor, 20 Chandos Street, St Leonards NSW 2065



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From: Stacey Kennedy <skennedy@emmconsulting.com.au>
Sent: Thursday, July 27, 2023 4:18 PM
To: Conor Wakefield <cwakefield@ntscorp.com.au>
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>; Mikhaila Chaplin <mchaplin@emmconsulting.com.au>; Nicolas Reilly <nreilly@emmconsulting.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

Hello Conor,

We are aiming to undertake field assessment of the site for the Blakebrook School on Monday 14/08/2023, Tuesday 15/08/2023 and Wednesday 16/08/2023. As per previous discussions, we are seeking Wia-bal Gurrmbil Aboriginal

Corporation's involvement in these on-site activities. A formal work scope is outlined below outlining requirements, payment, etc.

Requirements and details (work scope)

We are seeking four site officers from your organisation for a period of 3 days. The works will include a walkover of the site (pedestrian survey) and test excavations. This is being completed to identify Aboriginal objects (eg stone artefacts, scarred trees, hearths, etc), discuss the cultural values of the site, and work with our archaeologists to document them for reporting requirements.

We are authorised to pay up to **\$130 ex GST per hour** for each representative for a period of up to 8 hours per day of attendance..

At completion of the works, please provide an invoice to myself at EMM with the title 'Northern Rivers Recovery Project – Blakebrook: ACH activities' and we'll submit it for processing. Typically, we pay within three weeks of receipt of invoice, but timeframes of longer than this may occur during busy times.

Please find attached our subconsultant agreement for review and signature. If you have any issues or modifications, please contact us and we are happy to discuss and consider them.

Please note we will require copies of your WHS or equivalent White Cards, workers compensation/personal accident and public liability insurance.

Please note:

- Please ensure your site officers have all necessary safety gear (steel toecaps, hi-vis, long sleeves/pants, rain jacket, sun hat, safety glasses/sunglasses) for a day in the field. Please bring wet weather gear in case we do get some rain while on site.
- There may be limited shops where we are working so please bring lots of food and water for yourself for the day.

If you have any questions or would like to discuss further please do not hesitate to contact me.

Kind regards,

Stacey Kennedy

Associate / Technical Lead, Aboriginal Heritage

T 07 3648 1200

M 0408 597 246

www.emmconsulting.com.au

From: Conor Wakefield <cwakefield@ntscorp.com.au>

Sent: Monday, July 17, 2023 9:06 AM

To: Stacey Kennedy <skennedy@emmconsulting.com.au>

Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>

Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

CAUTION: This email originated outside of the Organisation.

Hi Stacey,

Thanks for the update. We'd be grateful if you could provide a further update once the details of the cultural heritage survey are organised so that the Wia-bal Gurrmbil Aboriginal Corporation can nominate cultural heritage monitors to participate in the survey.

Kind regards,

Conor Wakefield | Solicitor



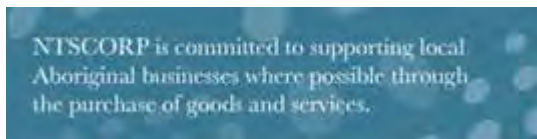
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t 61 2 9310 3188 **f** 02 9310 4177

m 0498 980 212

e: cwakefield@ntscorp.com.au | **w** www.ntscorp.com.au

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Please consider the environment before printing this email

From: Stacey Kennedy <skennedy@emmconsulting.com.au>
Sent: Monday, July 17, 2023 9:04 AM
To: Conor Wakefield <cwakefield@ntscorp.com.au>
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

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Hi Conor,

Apologies for my delayed response! Yes it is anticipated that Aboriginal cultural heritage monitors will participate in the archaeological field survey/testing referred to in the methodology, and we hope to be on site in mid-August. I am currently working out the details of how many monitors and rates of payment with the client.

I hope to be able to get back to you very soon with further details.

Kindest regards,

Stacey Kennedy

Associate / Technical Lead, Aboriginal Heritage

T 07 3648 1200

M 0408 597 246

www.emmconsulting.com.au

From: Conor Wakefield <cwakefield@ntscorp.com.au>

Sent: Monday, July 17, 2023 8:58 AM

To: Stacey Kennedy <skennedy@emmconsulting.com.au>

Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>

Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

CAUTION: This email originated outside of the Organisation.

Hi Stacey,

Just following up on the below query.

Kind regards,

Conor Wakefield | Solicitor



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m 0498 980 212

e: cwakefield@ntscorp.com.au | **w** www.ntscorp.com.au

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Please consider the environment before printing this email

From: Conor Wakefield
Sent: Monday, July 10, 2023 9:36 AM
To: Stacey Kennedy <skennedy@emmconsulting.com.au>
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

Hi Stacey,

Thank you for confirming that the Widjabul Wia-bal Gurrmbil Aboriginal Corporation RNTBC will be exclusively consulted regarding the ACHA.

Please direct future correspondence to myself and Tilly Vaughan (copied to this email).

Could you please clarify whether Aboriginal cultural heritage monitors nominate by the Widjabul Wia-bal Gurrmbil Aboriginal Corporation RNTBC will be participating in the archaeological field survey referred to at 4.2 of the methodology, and if so, how many Aboriginal cultural heritage monitors will be engaged and what rate they will be paid?

Kind regards,

Conor Wakefield | Solicitor



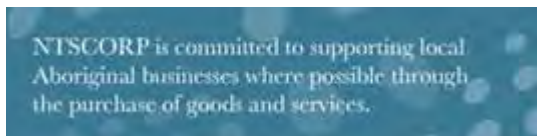
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Please consider the environment before printing this email

From: Stacey Kennedy <skennedy@emmconsulting.com.au>
Sent: Friday, July 7, 2023 3:33 PM
To: Conor Wakefield <cwakefield@ntscorp.com.au>
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

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Hi Conor,

Thank you for your emails below. We understand that Widjabul Wia-bal Gurrmbil Aboriginal Corporation is the Registered Native Title Body Corporate (RNBTC) established by Widjabul Wia-bal. We note and register their interest in the project and that we will be consulting with them exclusively for the Blakebrook ACHA.

Could you please let me know how Widjabul Wia-bal Gurrmbil Aboriginal Corporation would like to be consulted with moving forward, should all communication be directed to you in the first instance?

I have attached to this email a letter which provides more detail on the project and our proposed approach to the archaeological investigation. We are seeking feedback on the methodologies proposed and invite Widjabul Wia-bal Gurrmbil Aboriginal Corporation to provide information on any cultural values (which might include archaeological sites or other types of values) relevant to the study area and its surrounds should they wish to do so.

If you require any further information please do not hesitate to contact me.

Kind regards,

Stacey Kennedy

Associate / Technical Lead, Aboriginal Heritage

T 07 3648 1200

M 0408 597 246

www.emmconsulting.com.au

From: Conor Wakefield <cwakefield@ntscorp.com.au>
Sent: Thursday, June 29, 2023 9:08 AM
To: Stacey Kennedy <skennedy@emmconsulting.com.au>; Rohani Dutch <rdutch@emmconsulting.com.au>
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>
Subject: RE: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

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Hi Stacey,

Further to the below, we have received a further ACHA notification for this project (**attached**).

Please note the comments below regarding this project and the Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC.

Kind regards,

Conor Wakefield | Solicitor



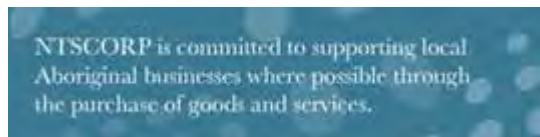
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e: cwakefield@ntscorp.com.au | w www.ntscorp.com.au

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Please consider the environment before printing this email

From: Conor Wakefield
Sent: Wednesday, June 21, 2023 4:13 PM
To: skennedy@emmconsulting.com.au; rdutch@emmconsulting.com.au
Cc: Matilda Vaughan <mvaughan@ntscorp.com.au>
Subject: ACHA – Proposal to rebuild Blakebrook Public School – Blakebrook - 2 June 2023.

Dear Stacey,

Thank you for providing the **attached** notice.

I provide this email by way of background in relation to:

- (a) The Widjabul Wia-bal Consent Determination;
- (b) The Widjabul Wia-bal Goori naa Land Use Agreement ILUA
- (c) The Widjabul Wia-bal Gurrmbil Aboriginal Corporation RNTBC

In December 2022, the Widjabul Wia-bal native title determination application was resolved by the Widjabul Wia-bal Consent Determination, available online here: <https://www.judgments.fedcourt.gov.au/judgments/Judgments/fca/single/2022/2022fca1521>.

The Widjabul Wia-bal Consent Determination officially recognises Widjabul Wia-bal people as the traditional owners of Widjabul Wia-bal Country.

The Widjabul Wia-bal Gurrmbil Aboriginal Corporation is the Registered Native Title Body Corporate (RNBTC) established by Widjabul Wia-bal to hold native title rights and interests and to progress Widjabul Wia-bal's interests. NTSCORP Ltd is the legal representative of the Widjabul Wia-bal Gurrmbil Aboriginal Corporation.

The Widjabul Wia-bal Goori naa Land Use Agreement ILUA sets out processes for the protection of, and engagement about, cultural heritage within Widjabul Wia-bal Country. An extract of the ILUA is available here: <http://www.nntt.gov.au/searchRegApps/NativeTitleRegisters/ILUA%20Register/2022/NI2022.002/ILUARegisterExport.pdf>

The consultation requirements in relation to Aboriginal Heritage Impact Permits are found in Regulation 60 of the [National Parks and Wildlife Regulation 2019 \(NPWR\)](#). Where native title has been determined to exist, regulation 60(3) of the NPWR applies such that the Proponent may consult with the RNTBC for that land, rather than following the process in regulation 60(2). Moreover, where a modified Aboriginal community consultation process is set out in a registered ILUA, Proponents are to carry out that process, in accordance with regulation 60(10) of the NPWR. Schedule E of the ILUA sets out a modified Aboriginal community consultation process that satisfies sub-regulations 60(1) and 60(10) of the NPWR. Accordingly, the Widjabul Wia-bal Gurrmbil Aboriginal Corporation should be exclusively consulted in relation to ACHAs prepared in conjunction within Widjabul Wia-bal Country. We encourage you to contact Heritage NSW for more information as to the operation of Schedule E of the ILUA.

In relation to this project, we note that Widjabul Wia-bal Gurrmbil Aboriginal Corporation should be exclusively consulted.

Kind regards,

Conor Wakefield | Solicitor



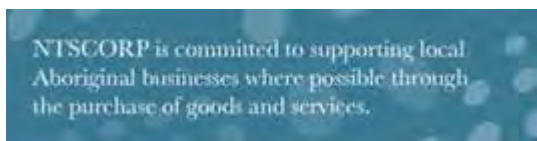
NTSCORP proudly acknowledge that our office is situated on the country of the Gadigal People. We also acknowledge and pay our respect to their Elders past and present.

t 61 2 9310 3188 **f** 02 9310 4177

m 0498 980 212

e: cwakefield@ntscorp.com.au | **w** www.ntscorp.com.au

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From: Rohani Dutch <rdutch@emmconsulting.com.au>
Sent: Friday, June 2, 2023 1:05 PM
Cc: Stacey Kennedy <skennedy@emmconsulting.com.au>

Subject: Northern Rivers Flood Recovery Program - Blakebrook Public School - Request for information on local Aboriginal stakeholders

You don't often get email from rdutch@emmconsulting.com.au. [Learn why this is important](#)

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To whom it may concern,

EMM Consulting Pty Ltd is undertaking an Aboriginal cultural heritage assessment of the proposed rebuilding of Blakebrook Public School, one of nine schools in the Northern Rivers region of NSW significantly affected by the 2022 floods. A letter attached provides further information.

I am writing to request contact information for local Aboriginal people you may be aware of who would be interested in the project, in accordance with the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

Please let me know if I can provide any further information to assist you.

Kind regards,

Rohani

Rohani Dutch

Graduate Archaeologist

Bushfire, Ecology, Heritage and Spatial Solutions



T 02 9493 9500

M 0459 353 013

 Connect with us

SYDNEY | Gamaraigal Country, Ground floor, 20 Chandos Street, St Leonards NSW 2065



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B.5 Stage 4 – Aboriginal feedback of the draft ACHA

Stacey Kennedy

From: Stacey Kennedy
Sent: Monday, 25 September 2023 4:58 PM
To: Matilda Vaughan
Subject: Blakebrook Public School - draft ACHA
Attachments: E230642_BlakebrookPS_ACHA_V2_RF.pdf

Dear Matilda,

I hope this email finds you well. The purpose of this email is to invite Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC to provide comment on the draft ACHA for the Blakebrook Public School as required under Heritage NSW's Aboriginal cultural heritage consultation requirements for proponents 2010.

Archaeological field survey and test excavation of the study area was undertaken over Monday 14/8/2023 to Wednesday 16/8/2023 and one stone artefact was identified within Test Pit 2 at approximately 55 cm depth. The development of the new school buildings cannot avoid impact to this site and as such the proponent is required to apply for an Aboriginal Heritage Impact Permit (AHIP) from Heritage NSW.

Section 10 of the ACHA outlines the proposed management strategy and recommendations to guide post-approval requirements for the project.

Could you please provide this information to the appropriate Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC representatives so that they can have a look through the document and if they would like to, provide any feedback, thoughts or input on the proposed recommendations and management strategies. I would greatly appreciate any feedback at any time that suits, via phone, email or letter form, but please aim to get to that back to me within 28 days before **Mon 23 October 2023**.

Alternatively, if you would like me to pass the report on to any particular individuals please let me know and provide their contact information and I can send a copy of the report directly.

If you have any problems accessing the report, or want to chat about the report further, please feel free to give me a call.

Kind regards,

Stacey Kennedy

Associate / Technical Lead – Aboriginal Heritage



T 07 3648 1200
M 0408 597 246
L [Connect on LinkedIn](#)
emmconsulting.com.au

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I work flexibly. I'm sending you this message now because it's a good time for me, but do not expect you to read, respond or action it outside your regular hours

Stacey Kennedy

From: Stacey Kennedy
Sent: Wednesday, 4 October 2023 2:17 PM
To: Matilda Vaughan
Subject: RE: Blakebrook Public School - draft ACHA

Dear Matilda,

As outlined in my previous email (below), School Infrastructure NSW (SINSW) are hoping to finalise the ACHA report for the Blakebrook Public School as soon as possible in order to meet the broader project timeframes.

As such, we would like to offer an online meeting to discuss the project with representatives of the Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC from 10 am on Tuesday 10 October 2023. We propose to run through the report, highlight the key findings and proposed archaeological management, and minute/document any concerns or questions for inclusion in a finalised version of the report. This would be in lieu of the need for written comments and we estimate that the meeting would take between 1 to 2 hours. We would offer \$300 (ex GST) for representatives attendance and participation in this meeting. I include the link to the meeting below (just click the 'join' line and follow prompts) and I will also shortly send a meeting invite for your diary.

If representatives cannot make the meeting but have availability to prioritise comments and inputs on the report in the next week, we will similarly pay \$300 ex GST for their receipt if received by the 10 October 2023.

If neither of these options are of interest, in accordance with the Heritage NSW guidelines (and as outlined below), we will leave the comment period open until the 23 October 2023.

If you have any questions or would like to discuss further please let me know.

Microsoft Teams meeting

Join on your computer, mobile app or room device

[Click here to join the meeting](#)

Meeting ID: 456 567 559 609

Passcode: JW4Fe7

[Download Teams](#) | [Join on the web](#)

[Learn More](#) | [Meeting options](#)

Kind regards,

Stacey Kennedy

Associate / Technical Lead, Aboriginal Heritage

T 07 3648 1200

M 0408 597 246

www.emmconsulting.com.au

I work flexibly. I'm sending you this message now because it's a good time for me, but do not expect you to read, respond or action it outside your regular hours

From: Stacey Kennedy
Sent: Monday, September 25, 2023 4:58 PM
To: Matilda Vaughan <mvaughan@ntscorp.com.au>
Subject: Blakebrook Public School - draft ACHA

Dear Matilda,

I hope this email finds you well. The purpose of this email is to invite Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC to provide comment on the draft ACHA for the Blakebrook Public School as required under Heritage NSW's Aboriginal cultural heritage consultation requirements for proponents 2010.

Archaeological field survey and test excavation of the study area was undertaken over Monday 14/8/2023 to Wednesday 16/8/2023 and one stone artefact was identified within Test Pit 2 at approximately 55 cm depth. The development of the new school buildings cannot avoid impact to this site and as such the proponent is required to apply for an Aboriginal Heritage Impact Permit (AHIP) from Heritage NSW.

Section 10 of the ACHA outlines the proposed management strategy and recommendations to guide post-approval requirements for the project.

Could you please provide this information to the appropriate Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC representatives so that they can have a look through the document and if they would like to, provide any feedback, thoughts or input on the proposed recommendations and management strategies. I would greatly appreciate any feedback at any time that suits, via phone, email or letter form, but please aim to get to that back to me within 28 days before **Mon 23 October 2023**.

Alternatively, if you would like me to pass the report on to any particular individuals please let me know and provide their contact information and I can send a copy of the report directly.

If you have any problems accessing the report, or want to chat about the report further, please feel free to give me a call.

Kind regards,

Stacey Kennedy

Associate / Technical Lead – Aboriginal Heritage



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Blakebrook Public School - draft ACHA

Date/time: Tuesday, 10 October 2023, 10:00 am to 11:00 pm

Facilitator: Stacey Kennedy, Associate / Technical Lead

Attendees: Noel King Jnr - Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC Stacey Kennedy – EMM Consulting Pty Ltd
Nicolas Reily – EMM Consulting Pty Ltd

Apologies: Auntie Queenie - Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC

Agenda

Item	Agenda Item	Presenter	Time
1	Draft ACHA – highlight of key findings and proposed archaeological management	Stacey Kennedy	10:00 am

Minutes and actions

Stacey Kennedy (SK) introduces the project and begins running through the ACHA -

- Explains background and general summary.
- Runs through project area.
- Runs through key findings of each section of the ACHA.
- Provides an overview of the environmental and previous studies mapping.
 - Noel King (NK) stated the Everick 2018 site was subject to further testing. A significant amount of artefacts were recovered of various stone types. The stone artefact assemblage was largely indicative of the general region.
- SK - runs through the approach and results of the field assessment.
- SK - discusses the stone artefact recovered.
 - NK interested in the stone artefact diagnostics
- SK and Nicolas Reilly (NR) go into further detail by referencing the stone artefact analysis conducted by Laressa Barry.
- SK goes through the significance assessment and how the scientific significance was determined. SK also points out that the cultural significance has been determined as low for the moment and invites Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC to provide comment/feedback on this should they wish to do so.
 - NK would like to discuss ACHA with board members wider community before providing any further information on cultural significance.
 - NK doesn't feel comfortable speaking for all without first discussing it with rest of Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC.
- NK discusses that the area surrounding the project area was part of the pathway and that because of this they would expect to find heritage within the project area. NK also explained that Boorie Creek was just over the ridge and was named after an old fella. Terania Creek follows up to a woman's place where there are water falls and birthing pools but NK feels uncomfortable discussing too much and reiterates that the wider Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC should be given an opportunity to review the ACHA and provide information should they choose.

- SK went through the Impact Assessment section and outlined that discussions with the client has indicated that they cannot avoid harm to site.
- NK asked whether the impact refers specifically to the artefact.
 - SK responded that it is regarding the buffer around where the artefact was found, and the artefact has been removed from the site and is located at EMM's offices until it is repatriated/reburied.
- NK curious about what cut and fill looks like? Augered holes?
 - Stacey shows proposal figures and outlines her understanding that the client will need to remove soil down to a metre (cut and fill) and then add clean fill to then build up appropriate foundations.
- NK asked whether the client be open to having someone present during the digging of the natural soil down to the clay in the buffer around the AHIP.
 - Leads into SK discussing recommendations.
 - SK mentions if there are specific requests that we will take that to the client for consideration.
- SK says she can reach out to the client to discuss specifics re: the amount of soil removed and where.
- NK says care needs to be undertaken in locations where hard fill clay were recorded as it's a floodplain and he had concerns on whether intact deposits may be present beneath the fill layers. NK mentioned that on a different job they were encountering artefacts at multiple metres below fill or floodplain layers.
- NK – recommended that Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC representatives be present during the proposed works to make sure no cultural deposits are present across the study area.
 - If the client is happy could monitors be present during the cutting of entire pit; and
 - Strongly recommend monitoring around construction works completed near where the artefact was identified (TP2).
- SK discussed other recommendations and asked NK whether he was happy with their inclusions.
 - NK generally agrees with the recommendations as discussed and asks if we can put something in regarding an unexpected finds procedure.
 - SK agrees and says we can include further detail on this.
- SK explains next steps
 - Will provide NK's feedback/comments to the client and seek permission for them to be included in the final ACHA.
 - If the client agrees with the feedback/comments they will be incorporated into the recommendations which will be double checked with the client.
 - SK to provide Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC with an update on outcome of above and will provide a final copy of the ACHA to the Widjabul Wia-bal Gurrumbil Aboriginal Corporation RNTBC
 - Once the ACHA is finalised the AHIP will be submitted.

Stacey Kennedy

From: Stacey Kennedy
Sent: Tuesday, 17 October 2023 2:11 PM
To: nkbj2211@live.com
Cc: Matilda Vaughan
Subject: draft ACHA - Blakebrook Public School

Hello Noel,

It was a pleasure to meet with you last week and thanks so very much for providing comments/feedback and recommendations on the draft ACHA report, it was greatly appreciated.

I passed this information on to the client and recommended that they include cultural monitoring of the proposed works as a recommendation in Section 10 of the ACHA. Unfortunately the client is not supportive of including cultural monitoring as a recommendation in the ACHA due to the sensitivity of the construction program schedule and the need for efficient progression of works. We will include your feedback and recommendations and all correspondence in the ACHA for regulator consideration during the AHIP application process.

In relation to the unexpected finds procedures (especially relating to Ancestral Remains) it is my understanding that these are expected to be included as conditions in the AHIP. We will send you a final version of the ACHA and AHIP in due course, but in the meantime if you have any questions or would like to discuss further please let me know.

Kindest regards,

Stacey Kennedy

Associate / Technical Lead – Aboriginal Heritage



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Rohani Dutch

From: Laressa Barry
Sent: Monday, 24 July 2023 3:28 PM
To: OEH HD Heritage Mailbox
Cc: Stacey Kennedy; Mikhaila Chaplin; Nicolas Reilly
Subject: E230642 - Northern Rivers Schools - Blakebrook Public School ACH test excavation
Attachments: E230642_Blakebrook_Project_Info_Methodology_7.07.2023.pdf

Dear ACH team,

In accordance with Requirement 15 of the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW, we wish to advise that EMM Consulting Pty Ltd is proposing to undertake Aboriginal archaeological test excavations at Blakebrook Public School, **commencing on either 7th or 14th August 2023** (the latter date reflective of the need to determine complex site logistics and Aboriginal stakeholder availability, which may delay the works by one week). We intend to complete the excavation over a period of between 3 and 5 days, dependent on the nature of the cultural deposits identified.

Further details of these excavations are included in the attached documentation (refer Section 4.3) provided to the RAPs on 7th July 2023.

Should you have any questions or require any further information, please do not hesitate to contact me.

Thank you and kind regards,

Laressa Barry

Senior Archaeologist | Aboriginal Heritage Team Leader (A)



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Note: My work days are Monday, Tuesday, and Thursday



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Mikhaila Chaplin

From: Mikhaila Chaplin
Sent: Thursday, 10 August 2023 12:02 PM
Subject: Blakebrook Public School - Upcoming site work (14-16 Aug)
Attachments: EMM Conditions of Engagement of Subconsultants 04042019_Aboriginal parties_v2_amended_230206.pdf

Hi everyone,

Looking forward to meeting you all out on site at Blakebrook Public School (417 Rosehill Rd, Blakebrook NSW 2480) this coming Monday 14 August for three days (14-16 August). Our site times are at **8am-4pm** and there will be street parking available near where we will be excavating.

If you haven't already, please send me your **insurances** (public liability and workers compensation) prior to Monday morning. If it's easier for you to bring hard copy versions to site on Monday morning that is fine as well. Please note, all site attendees are required to be insured and insurances will need to be sighted prior to site works commencing.

Please also send me your signed copies of the **subconsultant contract** (attached) prior to Monday morning. We will have copies on site if it's easier for you to sign on the day.

In preparing for site work next week please keep in mind the following.

- You have all necessary **safety gear** (steel toecaps, hi-vis, long sleeves/pants, rain jacket, sun hat, safety glasses/sunglasses) for a day in the field. Please bring wet weather gear in case we do get some rain while on site.
- There may be **limited shops** where we are working so please bring lots of food and water for yourself for the day.

Please reach out if you need anything and have a good rest of your week.

Kind Regards,

Mikhaila

Mikhaila Chaplin

Archaeologist | Bushfire, Ecology, Heritage and Spatial Solutions



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Stacey Kennedy

From: Stacey Kennedy
Sent: Friday, 8 September 2023 8:08 AM
To: OEH HD Heritage Mailbox
Cc: Mikhaila Chaplin; Nicolas Reilly
Subject: FW: E230642 - Northern Rivers Schools - Blakebrook Public School ACH test excavation
Attachments: E230642_Blakebrook_Project_Info_Methodology_7.07.2023.pdf; 0603 ACHA013_TestExcavationResults_20230907_01.pdf

Dear ACH team,

This is a follow up email to let you know that Aboriginal archaeological test excavations at the Blakebrook Public School were undertaken over three days from 14th August 2023 to 16 August 2023 in line with the attached methodology. The field team included EMM archaeologists and RAP participants from the Widjabul Wia-bal Gurrmbil Aboriginal Corporation. Excavations were carried out in accordance with the Code of Practice and one test pit (TP2) demonstrated the presence of a single silcrete artefact at approximately 50 cm depth. Test pit 2 was extended to a 1 x 1 m pit but no further Aboriginal objects were identified.

The draft ACHA report is currently being prepared and it is anticipated that it will be distributed to the RAP for review and comment in September/October 2023. The ACHA will present the development of mitigation measures based on the results of the impact assessment and input from the RAP during the consultation process.

Should you have any questions or require any further information, please do not hesitate to contact me.

Thank you and kind regards,

Stacey Kennedy

Associate / Technical Lead, Aboriginal Heritage

T 07 3648 1200

M 0408 597 246

www.emmconsulting.com.au

From: Laressa Barry <lbarry@emmconsulting.com.au>
Sent: Monday, July 24, 2023 3:28 PM
To: OEH HD Heritage Mailbox <heritagemailbox@environment.nsw.gov.au>
Cc: Stacey Kennedy <skennedy@emmconsulting.com.au>; Mikhaila Chaplin <mchaplin@emmconsulting.com.au>; Nicolas Reilly <nreilly@emmconsulting.com.au>
Subject: E230642 - Northern Rivers Schools - Blakebrook Public School ACH test excavation

Dear ACH team,

In accordance with Requirement 15 of the Code of Practice for Archaeological Investigations of Aboriginal Objects in NSW, we wish to advise that EMM Consulting Pty Ltd is proposing to undertake Aboriginal archaeological test excavations at Blakebrook Public School, **commencing on either 7th or 14th August 2023** (the latter date reflective of the need to determine complex site logistics and Aboriginal stakeholder availability, which may delay the works by one week). We intend to complete the excavation over a period of between 3 and 5 days, dependent on the nature of the cultural deposits identified.

Further details of these excavations are included in the attached documentation (refer Section 4.3) provided to the RAPs on 7th July 2023.

Should you have any questions or require any further information, please do not hesitate to contact me.

Thank you and kind regards,

Laressa Barry

Senior Archaeologist | Aboriginal Heritage Team Leader (A)



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Appendix C

Archaeological background

C.1 Site definitions and recording methods used for this assessment

C.2 Aboriginal sites

In the AHIMS database, Aboriginal sites are defined in several ways. At the simplest level, sites are recorded as 'closed' or 'open'. Closed sites are associated with rockshelters and include other evidence of Aboriginal occupation that may be present, such as areas where subsurface Aboriginal objects may occur within the shelter ('potential archaeological deposit' (PAD)), faunal remains, and art on the shelter walls (paintings/engravings). Open sites are broadly defined and encompass all other types of Aboriginal site features that are located in areas where there is no rockshelter. The most common open site features found generally include artefacts, grinding grooves, art, culturally modified trees, and shell deposits (middens) (OEH 2012). The presence or absence of stone artefacts is often a defining factor in site identification, with almost every site likely to have at least some associated artefacts, as discard or loss of this most ubiquitous and practically indestructible marker of past Aboriginal visitation.

Any one site (or group of linked sites described as a 'complex') can contain several different site features. For example, a shelter may have art on the walls, artefacts on the floor surface or outside the shelter, and be predicted to contain faunal remains and further artefacts in the accumulated deposit inside.

A description of terms used to describe different site features known to occur in the vicinity of the project area is provided in Table C.1 and use definitions provided by OEH and those adopted by EMM in their field investigations to produce consistency in recording. Similarly, there may be places of contemporary significance to Aboriginal people in the region and that will require consultation with this community to identify.

Table C.1 Site definitions and recording

Site feature	Definition and recording methods
Aboriginal ceremony and Dreaming	Previously referred to as mythological sites these are spiritual/story places where no physical evidence of previous use of the place may occur (e.g. natural unmodified landscape features, ceremonial or spiritual areas, men's/women's sites, dreaming (creation) tracks, marriage places etc.)
Artefact site (open stone artefact site)	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people. Open stone artefact sites were defined by the presence of one (isolated find) or more (artefact scatter) stone artefacts visible on the ground surface. The boundaries of a site are limited to the spatial extent of the visible stone artefacts. The mapped site points and/or 'site areas' do not represent the areas of potential archaeological deposit (PAD) that also apply to some sites (refer to the term 'PAD' below). Open stone artefact sites were recorded by marking each artefact location or each cluster of artefacts within a 5 m radius as a separate waypoint in the GPS. Site boundaries were allocated by drawing a line around the cluster waypoints for each site using ArcGIS software. Stone artefacts more than 50 m apart were recorded as separate sites. EMM acknowledges that the 50 m rule applied here is an arbitrary distinction for site boundaries and is used mainly for efficiencies in site management and to establish consistency in site recording methods
Burials	A traditional or contemporary (post-contact) burial of an Aboriginal person, which may occur outside designated cemeteries and may not be marked (e.g. in caves, marked by stone cairns, in sand areas, along creek banks)
Fish trap	A modified area on watercourses where fish were trapped for short-term storage and gathering.
Grinding grooves	Grinding grooves were defined as an area of outcropping bedrock containing evidence of one or more grinding grooves where ground-stone hatchets or other grinding practices (i.e. seed grinding) were implemented.

Table C.1 **Site definitions and recording**

Site feature	Definition and recording methods
Habitation structure	<p>Structures constructed by Aboriginal people for short- or long-term shelter. More temporary structures are commonly preserved away from the NSW coastline, may include historic camps of contemporary significance. Smaller structures may make use of natural materials such as branches, logs and bark sheets or manufactured materials such as corrugated iron to form shelters. Archaeological remains of a former structure such as chimney/fireplace, raised earth building platform, excavated pits, rubble mounds etc.</p>
Modified tree (carved or scarred)	<p>Trees which show the marks of modification as a result of cutting of bark from the trunk for use in the production of shields, canoes, boomerangs, burials shrouds, for medicinal purposes, foot holds etc., or alternately intentional carving of the heartwood of the tree to form a permanent marker to indicate ceremonial use/significance of a nearby area, again these carvings may also act as territorial or burial markers.</p> <p>Modified trees (either carved or scarred) can be difficult to identify. Scars commonly occur on trees through natural processes such as branch tears, insect damage, storm and fire damage and faunal damage. Scars can also occur from mechanical damage from vehicles or farming equipment.</p> <p>The attributes of potential scarred trees were discussed during the survey amongst archaeologists and RAPs before it was decided if a scar would be recorded or not. A precautionary approach was adopted, whereby some of the more ambiguous examples were recorded anyway. The assessment of scar trees was made from the experience of the survey team and the guideline <i>Aboriginal scarred trees in New South Wales: a field manual</i> (DEC 2005). In some of the more ambiguous examples, it cannot be verified whether some scars recorded during the survey are of natural or Aboriginal origin. In such instances, an expert evaluation by a scar tree expert (arborist or other) would be required to determine the status of certain trees.</p>
Potential archaeological deposit (PAD)	<p>An area where Aboriginal objects may occur below the ground surface.</p> <p>The term 'potential archaeological deposit' was first applied in Sydney regional archaeology in the 1980s, and referred to rockshelters that were large enough and contained enough accumulated deposit to allow archaeologists to predict that subsurface cultural material was likely to be present. Since then the term has come to include open sites where the same prediction can be made.</p> <p>EMM has defined PADs as the predicted extent of concentrated subsurface Aboriginal objects in a particular area. PADs are not technically Aboriginal sites until, and if, subsurface Aboriginal objects are identified, which is typically established through archaeological test excavation. PAD areas have been assigned to landforms that are distinguishable from the surrounding landscape (e.g. elevated areas with good outlook overlooking watercourses) as being likely to retain higher artefact densities than the assumed 'background scatter' of archaeological material in the broader landscape.</p> <p>The identification of PADs associated with Aboriginal open camp sites was partly based on observations in the field and discussions with RAPs, but also related to the predictive model. Although PAD was attributed to areas for a variety of reasons, the main qualifiers were as follows:</p> <ul style="list-style-type: none"> • The presence of surface artefacts or other Aboriginal objects. Ground surface visibility as part of the archaeological survey effort was typically considered high enough in each PAD area to identify at least one or more surface artefacts thereby indicating likelihood of subsurface potential. Notwithstanding, finding no visible surface artefacts in an area would not disqualify an area from being attributed with PAD. • Level to gently inclined ground (<10%) indicating suitable camping or activity areas. • Contours that distinguish the landforms with PAD from the surrounding landscape (e.g. spur crest, hill crest or knoll). Landform boundaries were also interpreted through observations in the field. Notably, rocky crest landforms that were protected from intensive cultivation were often attributed with PAD. • Proximity to water: typically up to 100 m from 1st and 2nd order streams and up to 200 m from 3rd order streams and above. Elevated landforms at the confluence of higher order streams were also more likely to be attributed with PAD. <p>EMM acknowledges that all PAD areas have been historically cleared of native vegetation and some have been subject to pasture improvements such as ploughing. As such, the term PAD does not assume high subsurface integrity; instead it is a prediction of potential subsurface artefact concentrations.</p> <p>All stone quarry sites are predicted to have PAD. The assumption is that in most cases the visible surface material at quarries is represented by larger artefacts (such as cores) and that smaller material (e.g. flakes) is likely to be buried.</p>

Table C.1 **Site definitions and recording**

Site feature	Definition and recording methods
Restricted	Site information contained in the Aboriginal Heritage Information Management System is available only to certain authorised groups of people, as requested by the Aboriginal community. Detailed information may not be available in search reports.
Shell	An accumulation or deposit of shellfish from beach, estuarine, lacustrine or riverine species resulting from Aboriginal gathering or consumption. Usually found in deposits previously referred to as shell middens. Must be found in association with other objects like stone tools, fish bones, charcoal, fireplaces/hearths, and burials. Will vary greatly in size and composition.
Stone quarry	<p>Usually a source of good quality stone which is quarried and used for the production of stone tools.</p> <p>Stone quarries represent where Aboriginal people gathered raw stone materials for stone tools and/or manufactured stone tools from the adjacent source material. Quarry sites are found at rock outcrops where the material was of suitable quality to have been used to manufacture stone tools. Stone quarries were defined by the presence of outcropping stone material with nearby evidence of the same material type used in the stone tool manufacture process. This was most commonly indicated by large stone cores or stone flakes distributed amongst the same naturally outcropping material.</p> <p>EMM acknowledges that the 'open stone artefact' site type shares some of the same characteristics as 'stone quarries', such as the presence of stone artefacts. However, they have been distinguished from each other because quarries can not only represent open camping activities, but also a fixed location where Aboriginal people needed to visit to extract a resource. In contrast, the locations of typical open camp sites were not fixed, but chosen by Aboriginal people for their favourable conditions.</p>

Appendix D

Field investigation

D.1 Photographic catalogue (field survey)

\\lemmsvr1\EMM\2023\230642 - Northern Rivers Recovery Project Stage 2\GIS\02 Maps\ Blakebrook\Photo Log\PI02 PhotoSurvey Map\PhotoRecord 20230921_01.mxd 22/09/2023



KEY

- Site boundary
- Photographic record
- Existing environment
- Major road
- Vehicular track
- Named watercourse

Photographic record
Photo survey

Blakebrook Public School
Aboriginal Cultural Heritage Assessment



Source: EMM (2023); DFSI (2017, 2020); Metromap (2023); GA (2011)



Photo Point ID: 1

Photo 1:	Photo 2:	Photo 3:
		
Photo 4:	Photo 5:	Photo 6:




Photo 1:	Photo 2:	Photo 3:
		
Photo 4:	Photo 5:	Photo 6:



Photo 1:	Photo 2:	Photo 3:
		
Photo 4:	Photo 5:	Photo 6:

Photo 1:	Photo 2:	Photo 3:
		
Photo 4:	Photo 5:	Photo 6:

Photo Point ID: 5

Photo 1:



Photo 2:



Photo 3:



Photo 4:



Photo 5:



Photo 6:



Photo 1:	Photo 2:	Photo 3:
		
Photo 4:	Photo 5:	Photo 6:

\\lemmsvr1\EMM\2023\230642 - Northern Rivers Recovery Project Stage 2\GIS\02 Maps\ Blakebrook\Photo Log\PI01 TestExcavation MapPhotoRecord 20230921_01.mxd 22/09/2023



KEY

- Site boundary
- Photographic record
- Existing environment
- Major road
- Vehicular track
- Named watercourse


Photographic record
Test Excavation

Blakebrook Public School
Aboriginal Cultural Heritage Assessment



Source: EMM (2023); DFSI (2017, 2020); Metromap (2023); GA (2011)

0 50 100
m
GDA2020 MGA Zone 56

Context North	Base of pit - north	North section
East section	South section	West section
<div></div> <div>image3-20230815-233103.jpg</div>		




Test pit ID: TP 2b

Context North	Base of pit - north	North section
 <p>image1-20230815-222920.jpg</p>	 <p>image2-20230815-222536.jpg</p>	 <p>image3-20230815-222610.jpg</p>
East section	South section	West section
 <p>image4-20230815-222736.jpg</p>	 <p>image5-20230815-222814.jpg</p>	 <p>image6-20230815-222855.jpg</p>



Test pit ID: TP 3




Context North	Base of pit - north	North section
<div></div> <div>image1-20230816-001840.jpg</div>	<div></div> <div>image2-20230816-001853.jpg</div>	<div></div> <div>image3-20230816-002033.jpg</div>
East section	South section	West section

Test pit ID: TP 5

Context North	Base of pit - north	North section
<div></div> <div>image1-20230814-234655.jpg</div>	<div></div> <div>image2-20230814-234435.jpg</div>	<div></div> <div>image3-20230814-234444.jpg</div>
East section	South section	West section

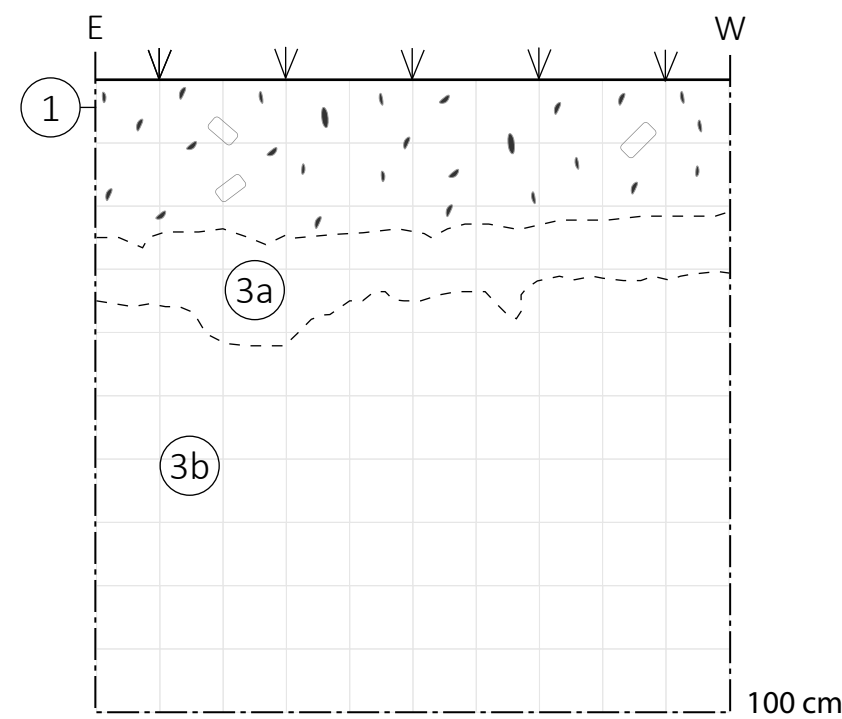
Context North	Base of pit - north	North section
<div></div> <div>image4-20230814-233900.jpg</div>	<div></div> <div>image1-20230814-233801.jpg</div>	<div></div> <div>image3-20230814-233839.jpg</div>
East section	South section	West section

Context North	Base of pit - north	North section
<div></div> <div>image1-20230815-010634.jpg</div>	<div></div> <div>image2-20230815-010653.jpg</div>	<div></div> <div>image3-20230815-010705.jpg</div>
East section	South section	West section

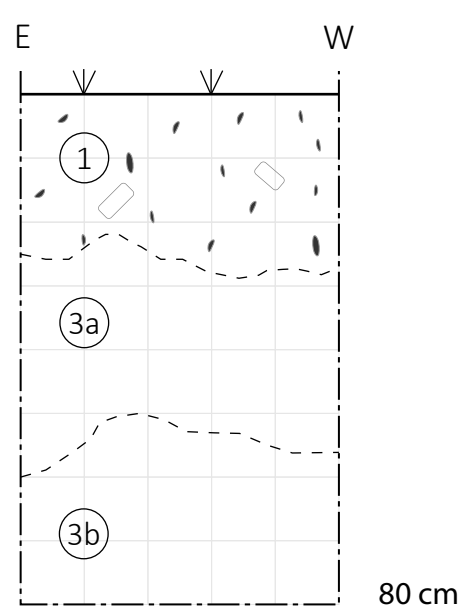
Context North	Base of pit - north	North section
<div></div> <div>image1-20230815-011024.jpg</div>	<div></div> <div>image2-20230815-011042.jpg</div>	<div></div> <div>image3-20230815-011052.jpg</div>
East section	South section	West section

Context North	Base of pit - north	North section
<div></div> <div>image1-20230815-011348.jpg</div>	<div></div> <div>image2-20230815-011357.jpg</div>	<div></div> <div>image3-20230815-011411.jpg</div>
East section	South section	West section

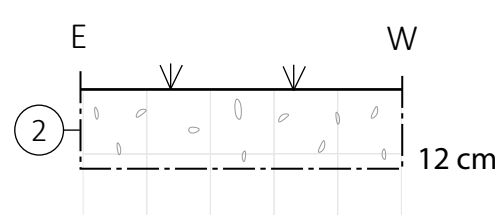
TP 2
NORTH SECTION



TP 3
NORTH SECTION



TP 11
NORTH SECTION



- 1 MODERN SANDY LOAM TOPSOIL. LOOSE BROWN ORGANIC SAND WITH FREQUENT ROOTS AND 20TH CENTURY DEBRIS, INCLUDING GLASS AND PLASTIC INCLUSIONS.

2 INTRODUCED FILL. LIGHT BROWN MODERATE CLAY FILL WITH SUB-ANGULAR GRAVEL INCLUSIONS.
- 3a LEYCESTER SOIL LANDSCAPE (A1 HORIZON) CONSISTING OF MODERATELY COMPACTED BROWN SANDY CLAY LOAM WITH POCKETS OF SMALL WHITE AND YELLOW SAND INCLUSIONS.

3b LEYCESTER SOIL LANDSCAPE (A1 HORIZON) DARK REDDISH BROWN LIGHT CLAY LOAM WITH FINE ROOTS.
- 4 LEYCESTER SOIL LANDSCAPE (B2 HORIZON) AN INDURATED DARK REDDISH BROWN MOTTLED CRACKLING CLAY.



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VERSION	DESCRIPTION	DATE
1.0	DRAFT	30/08/2023
1.1	DRAFT	12/09/2023
1.2	DRAFT	14/09/2023

LEGEND	
	PIT BOUNDARY
	SOIL PROFILE BOUNDARY
	DIFFUSE SOIL PROFILE BOUNDARY
	SUB-ANGULAR GRAVEL INCLUSIONS
	GLASS INCLUSIONS
	GLASS INCLUSIONS

CLIENT
SCHOOLS INFRASTRUCTURE
NSW

PROJECT
BLAKEBROOK PUBLIC SCHOOL - NORTHERN
RIVERS RECOVERY PROJECT STAGE 2

TITLE
TEST PIT SECTION DRAWINGS

TP SECTION DRAWINGS		
SCALE 1:20	DRAWN/CHECK POP	DRAWING NO. 001
PROJECT NO. E230642	VERSION 1.0	

31 August 2023

Re: Analysis of Lithic Assemblage recovered from Blakebrook Public School - August 2023

To Whom it May Concern,

This letter summarises the results of the analysis of lithic (stone) material recovered from archaeological test excavations of the Blakebrook Public School, completed between 14 and 16 August 2023 by EMM Consulting Pty Limited (EMM). The analysis was undertaken at the EMM Sydney office by Laressa Barry, Senior Archaeologist (B. Arts Hons., *University of Sydney*, 2012). The recovered material was first cleaned with tap water and then wiped with lint-free Kimwipes, then left to air-dry before being subsequently analysed. Each object was inspected with an 18 mm hand lens (20x magnification) and catalogued in tabular format. Artefact categories and typologies were determined with reference to the work of Holdaway and Stern (2004). Representative photographs of the cultural material were taken with a Samsung 12 MP digital camera (f/1.8, 26mm (wide), 1/1.76", 1.8µm, Dual Pixel PDAF, OIS) and have been included in this report.

One Aboriginal stone artefact was recovered over the course of the test excavation program, from the southeast quadrant of test pit 2 (TP2), located in the north-western corner of the school yard. It was recovered at a depth of 55 cm below the ground surface, at the base of a silty brown A₂ horizon sub-soil. A total of seven test pits were excavated across the school site, for an overall excavated area of 2.5m², and an overall artefact density of 0.4/m².

The recovered artefact comprises a small (41x37x24mm) pink and grey medium-grained silcrete core (Table 1.1). It retains a small amount (less than 25%) of cortex material that has a rough rind (Plate 1), suggesting that the raw stone cobble the core was extracted from was obtained from a primary source, or an *in situ* outcrop, rather than a secondary source like a nearby watercourse (Holdaway and Stern 2004, p.26). The cortex is relatively thin (i.e., less than 2mm in thickness), which suggests that the material was not left to weather on the ground surface for a very long period of time, and that the cobble was heavily reduced before it was eventually lost or discarded.

The platform (top) edge of the artefact demonstrates that the core body derived from a larger flake that was struck off a cobble; with a clear impact point, rippling and a broad, negative flake scar (Plate 2). The flake was then rotated 90 degrees, and attempts were made to knap small flakes in a single direction (uni-directionally) away from the platform surface. The subsequent negative flake scars are less than 20mm in length and terminate abruptly in stepped or hinged terminations, and there is a considerable degree of crushing along the platform edge margin (Plate 3). These features suggest a considerable degree of pre-planning on the part of the manufacturer – the cobble was deliberately prepared to remove the outer rind because it can fracture in unpredictable ways, and flakes with cortex are less durable and less sharp than flakes without cortex (Holdaway and Stern 2004, p.27). However, the core produced unfavourable flakes and was ultimately discarded.



Plate 1 Silcrete core from TP2, showing cortex rind (dashed), and negative flake scars.



Plate 2 Silcrete core from TP2, showing platform surface with impact point (arrowed).

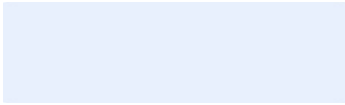


Plate 3 Silcrete core from TP2, showing stepped negative flake scars and crushing of platform edge.

Based on the nature of the assemblage recovered, it is difficult to draw conclusions about the nature of activities that may have been taking place on the site based on artefact analysis alone. This is especially the case considering that no formal stone tool types were identified. The absence of other debitage or “waste” material produced from the working of this core suggests that core reduction activities appear not to have been occurring on site, however only a small proportion of the site was excavated (approximately 2.5m²). Rather, the limited assemblage may hint that Aboriginal use of the areas investigated occurred sporadically – it represents transitory use of the landscape by hunter-gatherers and may reflect an isolated loss or random discard event. Notwithstanding, the small artefact size of the assemblage does indicate heavy core reduction was taking place in the area, and materials relatively common to the region were being utilised.

Please do not hesitate to contact me should you have any questions or require additional information.

Yours sincerely



Laressa Barry

Senior Archaeologist | Aboriginal Heritage Team Leader (A)

LBarry@emmconsulting.com.au

Table Error! No text of specified style in document..1

Lithic catalogue for Blakebrook Public School

Artefact ID	Test Pit	Quad	Spit	Depth (cm)	Type	Material	Colour	Heat damage	Cortex type (%)	Platform type	Dorsal features	Tool type	Retouch edge	Retouch type	Core type	Core body	Scar form	Max length (mm)	Max width (mm)	Max thickness (mm)	Weight (g)
1	2	SE	10	45-50	Core	Silcrete	Pink grey	No	0-25; Rough	Indeterminate					Uni-directional	Flake	Stepped and hinged	41	37	24	34

Table Error! No text of specified style in document..1

Lithic catalogue for Blakebrook Public School

Artefact ID	Test Pit	Quad	Spit	Depth (cm)	Type	Material	Colour	Heat damage	Cortex type (%)	Platform type	Dorsal features	Tool type	Retouch edge	Retouch type	Core type	Core body	Scar form	Max length (mm)	Max width (mm)	Max thickness (mm)	Weight (g)
1	2	SE	10	45-50	Core	Silcrete	Pink grey	No	0-25; Rough	Indeterminate					Uni-directional	Flake	Stepped and hinged	41	37	24	34

Appendix E

AHIMS data

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : E220793- Blakebrook PS

Client Service ID : 789703

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
04-4-0313	P3-STP4-IA	GDA	56	526584	6815565	Open site	Valid	Artefact : -		
	Contact	Recorders	Everick Heritage Pty Ltd,Mr.Jason Giang					Permits		
04-4-0182	Restriction applied. Please contact ahims@environment.nsw.gov.au.					Open site	Valid			
	Contact Mr.Ashley Moran	Recorders	Mr.Philip Habgood					Permits		
04-4-0318	P4-STP2-IA	GDA	56	527320	6816498	Open site	Valid	Artefact : -		
	Contact	Recorders	Everick Heritage Pty Ltd,Mr.Jason Giang					Permits		
04-4-0317	P6-TP1-AS	GDA	56	526852	6817063	Open site	Valid	Artefact : -		
	Contact	Recorders	Everick Heritage Pty Ltd,Mr.Jason Giang					Permits		
04-4-0184	Restriction applied. Please contact ahims@environment.nsw.gov.au.					Open site	Valid			
	Contact Mr.Ashley Moran	Recorders	Mr.Philip Habgood					Permits		
04-4-0109	Showground Camp	AGD	56	526733	6814527	Open site	Valid	Aboriginal Ceremony and Dreaming : -		
	Contact T Russell	Recorders	Ms.Katrina Stankowski					Permits		
04-4-0312	P6-STP2-IA	GDA	56	526883	6816970	Open site	Valid	Artefact : -		
	Contact	Recorders	Everick Heritage Pty Ltd,Mr.Jason Giang					Permits		
04-4-0218	NLPI-06	GDA	56	525546	6815189	Open site	Valid	Artefact : 1		
	Contact	Recorders	Doctor.Graham KNUCKEY,Remnant Archaeology					Permits		
04-4-0315	P4-STP12-AS1	GDA	56	527076	6816437	Open site	Valid	Artefact : -		
	Contact	Recorders	Everick Heritage Pty Ltd,Mr.Jason Giang					Permits		
04-4-0007	Tuncester	AGD	56	522400	6815700	Open site	Valid	Ceremonial Ring (Stone or Earth) : -	Bora/Ceremonial	102557
	Contact	Recorders	Unknown Author					Permits		
04-4-0183	Restriction applied. Please contact ahims@environment.nsw.gov.au.					Open site	Valid			
	Contact Mr.Ashley Moran	Recorders	Mr.Philip Habgood					Permits		
04-4-0010	Bob Durrabbin's Jurraveel; Tuncester	AGD	56	520800	6816030	Open site	Valid	Aboriginal Ceremony and Dreaming : -	Natural Mythological (Ritual)	102557
	Contact	Recorders	Unknown Author					Permits		
04-4-0114	Cubawee	AGD	56	520226	6814727	Open site	Valid	Habitation Structure : 1, Potential Archaeological Deposit (PAD) : 1		102557
	Contact T Russell	Recorders	Ms.Katrina Stankowski					Permits		
04-4-0316	P4-STP15-AS1	GDA	56	527150	6816326	Open site	Valid	Artefact : -		
	Contact	Recorders	Everick Heritage Pty Ltd,Mr.Jason Giang					Permits		
04-2-0094	Borton Road 1	AGD	56	527850	6819550	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders	Denis Byrne					Permits		

Report generated by AHIMS Web Service on 08/06/2023 for Mikhaila Chaplin for the following area at Lat, Long From : -28.7987, 153.1682 - Lat, Long To : -28.7235, 153.2918. Number of Aboriginal sites and Aboriginal objects found is 26

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

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : E220793- Blakebrook PS

Client Service ID : 789703

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
04-4-0219	NLPI-07	GDA	56	525530	6815190	Open site	Valid	Artefact : 1		
	<u>Contact</u>	<u>Recorders</u>	Doctor.Graham KNUCKEY,Remnant Archaeology							
04-4-0127	Cubawee Aboriginal Place	AGD	56	520226	6814724	Open site	Valid	Habitation Structure :-		102557
	<u>Contact</u> Searle	<u>Recorders</u>	Mr.Ashley Moran							
04-4-0314	P4-STP9-AS-1	GDA	56	527081	6816431	Open site	Valid	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	Everick Heritage Pty Ltd,Mr.Jason Giang							
04-4-0319	P4-STP6-IA	GDA	56	527326	6816506	Open site	Valid	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	Everick Heritage Pty Ltd,Mr.Jason Giang							
04-4-0085	Boorie Creek Canoe Tree;BC-CT;	AGD	56	524600	6815570	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	102557
	<u>Contact</u>	<u>Recorders</u>	Denis Byrne							
04-4-0185	Restriction applied. Please contact ahims@environment.nsw.gov.au.					Open site	Valid			
	<u>Contact</u> Mr.Ashley Moran	<u>Recorders</u>	Mr.Philip Habgood							
04-4-0216	NLPI-05	GDA	56	525454	6815516	Open site	Valid	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	Doctor.Graham KNUCKEY							
04-4-0249	Lismore Plateau Stone Arrangement	GDA	56	525635	6815043	Open site	Not a Site	Stone Arrangement : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Jakub Czastka							
04-4-0088	Borton Road 1;Modanville;	AGD	56	527850	6819550	Open site	Valid	Artefact : -	Open Camp Site	
	<u>Contact</u>	<u>Recorders</u>	Denis Byrne							
04-4-0227	North Lismore Plateau Indigenous 08 (NLPI-08)	GDA	56	526643	6816129	Open site	Valid	Artefact : 1		
	<u>Contact</u>	<u>Recorders</u>	Remnant Archaeology							
04-4-0090	Boorie Ck. Canoe tree;?;	AGD	56	524600	6815570	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	102557
	<u>Contact</u>	<u>Recorders</u>	Denis Byrne							

** Site Status

Valid - The site has been recorded and accepted onto the system as valid

Destroyed - The site has been completely impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There is nothing left of the site on the ground but proponents should proceed with caution.

Partially Destroyed - The site has been only partially impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There might be parts or sections of the original site still present on the ground

Not a site - The site has been originally entered and accepted onto AHIMS as a valid site but after further investigations it was decided it is NOT an aboriginal site. Impact of this type of site does not require permit but Heritage NSW should be notified

Report generated by AHIMS Web Service on 08/06/2023 for Mikhaila Chaplin for the following area at Lat, Long From : -28.7987, 153.1682 - Lat, Long To : -28.7235, 153.2918. Number of Aboriginal sites and Aboriginal objects found is 26

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