

30 January 2020

Kristin Holt
Town Planner
PDC Lawyers and Planners
Suite 1, Level 2, 144 Junction Street
Nowra NSW 2541

Dear Kristin

Re: Aboriginal due diligence advice: Shoalhaven River Dredge Area, Terara, NSW
Our Ref: Matter 31375

Biosis Pty Ltd (Biosis) has been commissioned by PDC Lawyers and Planners to provide Aboriginal due diligence advice for the proposed works associated with the dredging of the Shoalhaven River bed, west of Pig Island, Terara New South Wales (NSW) (the study area) (Figure 1 and Figure 2).

Biosis previously undertook an Aboriginal due diligence assessment on 23 January 2012 (Matter no.14267), for dredging works within the same locale, that included a portion of the current study area (Biosis Pty Ltd 2012). The assessment concluded that the locale possessed low archaeological potential. This letter should be read in conjunction with Biosis 2012 due diligence report.

The purpose of this letter of advice is to assist the client in exercising due diligence in determining whether the project will involve activities that may harm Aboriginal objects, and to determine whether consent in the form of an Aboriginal Heritage Impact Permit (AHIP) is required. This letter of advice is required will inform a development application to be prepared by PDC Lawyers & Planners required under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A). Shoalhaven City Council is the determining authority (DA).

The *National Parks and Wildlife Act 1974* (NPW Act) provides specific protection for Aboriginal objects and declared Aboriginal places by establishing offences of harm. Harm is defined to mean destroying, defacing, damaging or moving an object from the land. There are a number of defences and exemptions to the offence of harming an Aboriginal object or place. The NPW Act states that a person or organisation who exercises due diligence in determining that their actions will not harm Aboriginal objects has a defence against prosecution for the strict liability offence of unknowingly harming an object without an AHIP.

The NPW Act allowed for a generic code of practice to explain what due diligence means. As a result, the *National Parks and Wildlife Regulation 2009* (NPW Regulation) adopted the *Due diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010) (the code). The code sets out the reasonable and practicable steps which individuals and organisations need to take in order to:

- Identify whether or not Aboriginal objects are, or are likely to be, present in an area.
- Determine whether or not their activities are likely to harm Aboriginal objects (if present).
- Determine whether an AHIP application is required.

This advice includes a desktop assessment prepared in accordance with the code, in order to adequately map areas of high, moderate and low archaeological sensitivity. It is useful to determine whether the code is applicable to the proposed project. The code outlines a series of questions to clarify this, responses to these questions are outlined in Table 1.

Table 1 Questions required to determine the applicability of the code

Question	Response
Is the activity a declared project under Part 3A of the EP&A Act?	No
Is the activity an exempt activity listed in the NPW Act or other legislation?	No
Will the activity involve harm that is trivial or negligible?	No
Is the activity in an Aboriginal place or are you already aware of Aboriginal objects on the land?	No
Is the activity a low impact activity for which there is a defence in the NPW Regulation?	No
Do you want to use an industry specific code of practice?	No
Do you wish to follow your own procedure?	No

As none of the above questions apply to the project, due diligence must be established through using the code. The code consists of a series of five steps outlined below.

Step 1: Will the activity disturb the ground surface or any culturally modified trees?

The proposed works will involve the extension of an area currently in use for the dredging of soil deposits for the purposes of sand extraction to include an area adjacent to north western extent of Pig Island.

The activity will disturb the ground surface and therefore consideration of Steps 2a and 2b of the code is required.

Step 2a. Search the Aboriginal Heritage Information Management System (AHIMS) database and use any other sources of information of which you are already aware

An extensive search of the AHIMS database was conducted on 16 January 2020 (Client service ID: 477281). The search identified 79 Aboriginal archaeological sites within a 5 kilometre search area, centred on the proposed study area. None of these registered sites are located *within* the study area (Figure 3). The mapping coordinates recorded for these sites were checked for consistency with their descriptions and location on maps from Aboriginal heritage reports where available. These descriptions and maps were relied where notable discrepancies occurred.

A simple analysis of the Aboriginal cultural heritage sites registered within 5 kilometres of the study area indicates that the dominant site type is artefact sites, representing 53.3% (n=56), with Rock shelter (art or deposit) accounting for 12.4% (n=12), PAD sites 11.4% (n=12) and Art (pigment or engraved) 8.6% (n=9) (Table 2). Habitation structures and grinding groove sites were represented by 5.7% each (n=6 each), with modified trees constituting 2.9% (n=3) of the total AHIMS sites recorded. Some AHIMS sites consisted of two features, such as artefact and shell, however for this assessment each site type was treated as an individual site. This explains why there were 79 sites identified by AHIMS and there are 105 sites in the table below.

The majority of sites are located within close proximity to the reliable sources of water, or were either exposed by land clearing and development works (artefact scatters), recorded in the areas with remnant native vegetation (scarred trees) or within areas where suitable sandstone outcrops for grinding grooves and overhang development (shelters with art/deposit) were present.

Table 2 AHIMS sites within the vicinity of the study area

Site type	Occurrences	Frequency (%)
Artefact	56	53.3
Rock shelter (art or deposit)	13	12.4
Potential archaeological deposit (PAD)	12	11.4
Art (pigment or engraved)	9	8.6
Habitation structure	6	5.7
Grinding Groove	6	5.7
Modified tree (carved or scarred)	3	2.9
Total:	105	100

A review of the reports held by AHIMS identified several archaeological studies have been undertaken within the locality of the study area. These include:

Clarke and Kuskie (2006) undertook a study to create a predictive model for archaeological sites in the Lower Shoalhaven Region. The assessment involved background research, predictive modelling, and field survey. The predictive modelling undertaken suggested that the area could be divided into two resource zones, with the expected occupation patterns in each zone shown in Table 3.

Table 3 Resource zones in the Lower Shoalhaven (Clarke and Kuskie 2006, p. ii)

Resource zone	Description
Primary	Primary resource zones were defined in terrain units in close proximity to the major Shoalhaven and Crookhaven Rivers. These zones have higher probability of containing evidence for a wide range of occupation types including congregations of large groups of people, community base camps, nuclear / extended family base camps, camping by small hunting and/or gathering (without camping) and transitory movement. Occupation is likely to have been regular and potentially longer in duration in the primary zones.
Secondary	Secondary resource zones were defined in terrain units in close proximity to higher order creeks and/or wetlands, including Bomaderry, Mundamia, Calymea, Flat Rock, Bengalee and Sandy Creeks and their associated flats, slopes and terraces. These secondary zones have a high probability of containing evidence of nuclear / extended family base camps, camping by small and/or gathering parties, hunting and/or gathering (without camping) and transitory movement. Occupation is likely to have been sporadic and relatively short in duration in secondary zones.
Areas	Areas outside the primary and secondary resource zones included terrain units distant from higher

outside Primary and Secondary zones	order creeks and/or wetlands, such as lower order drainage depressions and associated slopes and crests. Occupation in these areas is likely to have involved hunting and/or gathering (without camping) and transitory movement and is likely to have been sporadic and very short in duration.
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Kelleher Nightingale Consulting (2010) conducted an archaeological assessment for RMS ahead of the proposed North Nowra Link Road. The assessment involved Aboriginal consultation, background research, and survey of three proposed route options. The survey identified a total of 28 Aboriginal sites along the course of the three proposed routes. These included four artefact scatters, two isolated finds, one midden site, one grinding groove site, 19 rock shelter sites and one non-Aboriginal scarred tree, recorded to avoid confusion at a later date.

Artefact Heritage (2015) undertook an assessment in advance of the construction of a resource recovery park at West Nowra. Based on the background research undertaken, Artefact Heritage developed the following predictive statements relating to site distribution within the area:

- Stone artefacts/artefact scatters will be the most likely Aboriginal site types
- Identification of artefact sites will be dependent on visibility and vegetation density- artefacts will more frequently be identified on eroded surfaces.
- Based on the spatial patterning of recorded Aboriginal sites and on findings from previous studies in the area, the highest numbers of sites and sites with the highest densities of artefacts are likely to be located along main waterways.
- Modified trees may be identified within the study area if suitable old growth trees remain
- Areas of PAD may be identified where suitable depth of deposit exists, in areas that feature a relative lack of disturbance.

The assessment concluded that the only material traces of Aboriginal occupation remaining would likely be of stone artefacts and/or modified trees. The potential for shelter sites, middens, quarries, rock engravings and axe grinding grooves is limited by the landscape context and historical land use. Areas of PAD would be dependent on landform and levels of disturbance. Areas of PAD would not be identified across steep slopes or in areas of high disturbance (Artefact Heritage 2015, p.20).

The survey did not identify any sites or areas of potential. This was considered likely due to the fact that the survey area was located outside of the primary and secondary resource zones as outlined by Clarke and Kuskie (2006). The survey area was considered to have low archaeological potential.

Kayandel Archaeological Services (2011) completed an Aboriginal heritage assessment for the Shoalhaven Starches Gas Pipeline Scheme northeast of Nowra. The predictive modelling undertaken by Kayandel drew primarily on the work conducted by Clarke and Kuskie (2006), noting that artefact scatters are the most common site type across the region, with grinding grooves and rock shelters also occurring frequently. It was stated that the presence of water courses and the landforms in the area would determine the type and extent of Aboriginal occupation, with occupation occurring in association with reliable sources of water. All areas surveyed as a part of the project were considered to be highly impacted by current land use, with the visibility considered negligible. The surveyed areas were all located on a low lying floodplain, which was not considered conducive to Aboriginal occupation. As such, it was assessed that there was a low potential for

stone artefacts to be present within the area, and that the potential for all other forms of Aboriginal occupation was negligible.

Biosis (2012) undertook an Aboriginal due diligence assessment for dredging works within the Shoalhaven sands of Pig Island, which included the current study area. A site visit was undertaken as part of the assessment. Ground surface visibility was high at low tide. Soil profiles were inspected and found to have been eroded due to frequent tidal activities occurring. The assessment concluded that though the tidal flat would have been utilised by Aboriginal people for resource gathering, it would not have been suitable for occupation. Due to the nature of the landform, the area of proposed works was assessed as containing low potential for archaeological objects to be identified, and no archaeological potential for archaeological deposits to occur.

Biosis (2016) completed an Aboriginal due diligence assessment for remediation works to Nowra Bridge on behalf of Roads and Maritime Services. Two AHIMS sites were previously identified in the study area (#52-5-0086 and #52-5-0087). Both sites were recorded as rock shelter containing deposit, recorded in 1978. The assessment concluded that the sites were likely located in association with the escarpment to the northern edge of the remediation site, and therefore were unlikely to be impacted by the remediation works. Predictive modelling undertaken for the study area concluded that there was moderate potential for artefact, PAD, grinding grooves, scarred tree and high to moderate potential for rock shelter sites to occur within the study area, based upon previous archaeological studies which had been undertaken within the region, AHIMS sites patterning, and the landscape context of the study area. A field survey of the location of the ancillary works was undertaken. The study area was assessed as containing low archaeological potential, as it is within the Shoalhaven River Flood Zone.

Biosis (2018a) were commissioned by Cardno to complete an Aboriginal due diligence assessment for the residential development at Taylors Lane, 371 Illaroo Road, Bangalee, NSW. The assessment included a review of background research to formulate predictive modelling statements regarding the Aboriginal cultural heritage of the study area. Predictive modelling concluded that there was moderate potential for artefact sites and PAD sites to occur within the study area, as it was situated upon a hillcrest, and slopes overlooking an alluvial flat within close proximity to major streamlines, such as Bomaderry Creek, A 5th order perennial water course. A survey was undertaken across all landforms within the study area. No previously unrecorded Aboriginal sites or objects were located during the field survey. However, based on the results of the field survey which noted low levels of disturbance, and background research, the flat to gently sloped hill crest in the north section of the study area, and the terrace overlooking the floodplain were assessed to have moderate and high archaeological potential, respectively, for subsurface cultural deposits. Further assessment was recommended.

Biosis (2018b) undertook an Aboriginal cultural heritage assessment for a proposed subdivision at Taylors Lane 371 Illaroo Road, Bangalee, NSW, which included a portion of the study area assessed by Biosis in 2018 (Biosis Pty Ltd 2018a). Background research identified that the following landforms were archaeologically sensitive:

- Locally elevated landforms within valley floor contexts, on alluvium and which are in proximity of major streams and rivers (third order or higher drainage lines).
- The banks of rivers and creeks where they are locally elevated and well drained.
- Level or low gradient basal slopes above, and set back from, the valley floor.
- The lower elevation or terminal section of major spurs and ridgelines where they adjoin or traverse the valley floor.

- Level or low gradient ground on the crests of spurs and ridgelines.

Test excavations were carried out within the areas of moderate and high archaeological potential identified during Biosis prior survey of the study area (Biosis Pty Ltd 2018a). The test excavations identified one Aboriginal heritage site (AHIMS #52-5-0871), which consisted of a single chert backed geometric microlith upon a flat to slightly slope saddle crest. The site was assessed to possess low archaeological significance.

Step 2b. Activities in areas where landscape features indicate the presence of Aboriginal objects

In order to determine whether the proposed works has the potential to impact landscape features likely to contain Aboriginal objects, a review of information pertaining to ethnohistories, soils, geology, landform, disturbance and potential resources has been undertaken.

Ethnohistory

It is generally accepted that Aboriginal peoples have inhabited Australia for the last 50,000 years (Allen and O'Connell 2003). Despite a proliferation of known Aboriginal sites there is considerable ongoing debate about the nature, territory and range of pre-contact Indigenous language groups in the region. These debates have arisen largely due to the lack of ethnographic and linguistic information recorded at the time of European contact. By the time colonial diarists, missionaries and proto-anthropologists began making detailed records of indigenous people in the late 19th century; pre-European Indigenous groups had been broken up and reconfigured by European settlement activity.

The study area is located within the Shoalhaven River, which was regarded as a natural boundary between the Wodi Wodi and Wandandian tribal areas as defined by Tindale (1974), with the Wodi Wodi territory extending north into the Illawarra and up to Wollongong, and Wandandian territory extending south to Ulladulla. The areas inhabited by each of the groups are considered to be indicative only and would have changed through time and possibly also depending on circumstances (i.e. availability and distribution of resources). Interactions between different types of social groupings would have varied between seasons and depending on resource availability.

The first account of local Aboriginal people within the area by Europeans was in 1770 when Cook and Banks saw fire on the Murramarang shore. After settlement, Aboriginal people and their canoes were first seen at Jervis Bay by the crew of a whaling boat in 1791, and the first contact was made after the longboat of the wrecked Sydney Cove was wrecked near Cape Howe, the crew having journeyed north. The first official visitation to the Shoalhaven coast came in 1801 when the Lady Nelson, along with Francis Barrallier on board, sent a landing party on shore at Jervis Bay. Over the next two decades the Aboriginal camps in the Shoalhaven were severely affected by European appropriation of land, however the Aboriginal population remained visible through the 1830's.

In 1838, Alexander Berry conducted a census of Aboriginal people in close proximity to his estate. The census produced the following results (NOHC 2007, p. 12) (Table 4):

Table 4 Counts of Aboriginal people in the Shoalhaven area undertaken by Alexander Beben (NOHC 2007, p. 12)

Aboriginal Group	Number of People
Broughton Creek	26
Gerringong Tribe	21
Jervis Bay	62
Numba Tribe	25
Shoalhaven Tribe	39
Uurro Tribe	24
Wooragee Tribe	45

The results of this census also indicated that the number of Aboriginal people in the area had decreased in the last 16 years prior to Alexander Berry's census (NOHC 2007, p. 12). Throughout the 1830s and 1840s, large portions of the area were taken up by land grants, forcing the local Aboriginal population into fringe camps adjacent to European settlements or in to the rough mountainous country to the west and this would have contributed to the decrease in Aboriginal populations seen by Berry.

Geology, soils and hydrology

The study area is located within the Shoalhaven River, an 8th order perennial water source, and is situated within an extensive tidal flat. The study area lies adjacent to the north-western extent of Pig Island. Pig Island is a lowland riverine feature that has formed through alluvial deposition most likely in the last 5,500 years (Christian, A. and Hill S.M. 2002, p.8). The upstream extent of the Pig Island, where the study area is located, is actively aggrading and this alluvial deposition has led to the formation of an extensive sandy tidal flat that is partially exposed during low tide events. This occurs due to the formation of anabranches within the Shoalhaven River around Pig Island, and the reduced flow velocity. Fine sands and silts are evidence of low energy regimes (Rapp & Hill 2006, p.69) when deposition occurs under decreased velocity.

Resources

Terrains in close proximity of the Shoalhaven River would have provided an abundance of flora and fauna resources and contained a wider range of occupation types such as shelters and open camp sites. The sandstone outcrops along the banks of the river would have provided adequate overhangs or ledges for shelter sites and surfaces for axe grinding grooves. Raw material types used in the production of stone artefacts in the region consist of silcrete, quartz, chert, sandstone, and chalcedony. Quartz is widespread, appearing within conglomerate bands in the Nowra Sandstone Series as well as isolated pebbles. Chert sources can also be found in streams near the Cambewarra Ranges (Lampert, R. and Stelle, D. 1993). Silcrete can also be sourced from outcrops in the Ulladulla area, approximately 45 kilometres south of Nowra.

The wider region includes distinct ecological zones, including open forest and open woodland, with riparian vegetation extending along many of the watercourses. Each ecological zone hosts a different array of floral and faunal species, many of which would have been utilised according to seasonal availability. Plant resources were used in a variety of ways. Fibres were twisted into string, which was used for many

purposes, including the weaving of nets, baskets and fishing lines. String was also used for personal adornment. Bark was used in the provision of shelter; a large sheet of bark being propped against a stick to form a gunyah (Attenbrow 2002). Ethnographic observations noted the use of cabbage tree, yams, honeysuckle, pigface, native cranberry and kangaroo apple as important resources (Boot 2002).

As well as being important food sources, animal products were also used for tool making and fashioning a myriad of utilitarian and ceremonial items. For example, tail sinews are known to have been used to make fastening cord, while 'bone points', which would have functioned as awls or piercers, are often an abundant part of the archaeological record. Animals such as Brush-tailed Possums were highly prized for their fur, with Possum skin cloaks worn fastened over one shoulder and under the other. Kangaroo teeth were incorporated into decorative items, such as head bands (Attenbrow 2002). Fish species such as Bream, Trumpeter, Whiting, Salmon, Eel and Shark were important sources of food, as were Oysters, Mussels, Possum, Kangaroo and Wombat (Boot 2002)

Disturbances

According to the Lower Shoalhaven River Floodplain Risk Management Study (Webb, Mckeown, and Associates 2008), Pig Island has been actively aggrading since the time of European settlement, as stated above, and has increased in length and width. An analysis of aerial photographs from 1949 until present, confirms that since 1970 there is a significant accretion of sediments at the western and north-western extents of the Pig Island (Martens 2011 Attachment C). Biosis' previous site inspection of the study area notes that the only visible disturbance within the study area were as a result of natural tidal processes, with the western bank extensively eroded (Biosis Pty Ltd 2012, p.5). Biosis also identified that immature mangrove and saltmarsh communities were present within the study area and argued that this suggests the area is prone to erosional and depositional events (Biosis Pty Ltd 2012, p.5, Martens 2011, p.14).

Step 3. Can you avoid harm to the object or disturbance of the landscape feature?

Due to the nature of the proposed works, avoidance of disturbance of the landscape feature is not considered plausible.

Step 4: Desktop assessment

Desktop assessment

Based upon the results from Stages 2a and 2b of the code a model has been formulated to broadly predict the type and character of Aboriginal cultural heritage sites likely to exist throughout the study area and where they are more likely to be located.

This model is based on:

- Local and regional site distribution in relation to landform features identified within the study area.
- Consideration of site type, raw material types and site densities likely to be present within the study area.
- Findings of the ethnohistorical research on the potential for material traces to present within the study area.
- Potential Aboriginal use of natural resources present or once present within the study area.

- Consideration of the temporal and spatial relationships of sites within the study area and surrounding region.

Based on this information, a predictive model has been developed, indicating the site types most likely to be encountered during the survey and subsequent sub-surface investigations across the present study area (Table 5). The definition of each site type is described firstly, followed by the predicted likelihood of this site type occurring within the study area.

Table 5 Aboriginal site prediction statements

Site type	Site description	Potential
Flaked stone artefact scatters and isolated artefacts	Artefact scatter sites can range from high-density concentrations of flaked stone and ground stone artefacts to sparse, low-density 'background' scatters and isolated finds.	Low: Stone artefact sites have been previously recorded in the region on level, well-drained topographies in close proximity to reliable sources of fresh water. Artefact sites are unlikely to occur within the study area due to its situated upon a tidal flat where soils are frequently inundated, eroded and then redeposited, resulting in poor site preservation within shifting sands.
Shell middens	Deposits of shells accumulated over either singular large resource gathering events or over longer periods of time.	Low: Shell midden sites have not been recorded within the vicinity of the study area. There is a very low potential for shell middens to be located in the study area as it is situated upon a tidal flat where soils are frequently inundated, eroded and then redeposited, resulting in poor site preservation within shifting sands.
Potential Archaeological Deposits (PADs)	Potential sub surface deposits of cultural material.	Low: PADs have been previously recorded in the region across a wide range of landforms. PADs are likely to be present within areas adjacent to water courses or on high points in undisturbed landforms. Due to the study area being situated within upon a tidal flat, PAD site preservation is unlikely.
Burials	Aboriginal burial sites.	Low: Aboriginal burial sites are generally situated within deep, soft sediments, caves or hollow trees. Areas of deep sandy deposits will have the potential for Aboriginal burials. Aboriginal burial sites have low potential to be preserved within soil profiles associated with the study area due to their tidal nature, and high erodability.
Aboriginal	Such sites are often intangible places and features	Low: There are currently no recorded

Site type	Site description	Potential
Ceremony and Dreaming sites	and are identified through oral histories, ethnohistoric data, or Aboriginal informants.	mythological stories for the study area.
Post-contact sites	These are sites relating to the shared history of Aboriginal and non-Aboriginal people of an area and may include places such as missions, massacre sites, post-contact camp sites and buildings associated with post-contact Aboriginal use.	Low: There are no post-contact sites previously recorded in the study area and historical sources do not identify one.
Aboriginal places	Aboriginal places may not contain any 'archaeological' indicators of a site, but are nonetheless important to Aboriginal people. They may be places of cultural, spiritual or historic significance. Often they are places tied to community history and may include natural features (such as swimming and fishing holes), places where Aboriginal political events commenced or particular buildings.	Low: There are currently no recorded Aboriginal historical associations for the study area.
Quarries	Raw stone material procurement sites.	Nil: There is no record of any quarries being within or surrounding the study area. The study area does not contain suitable geological outcropping to facilitate the presence of quarry sites.
Rock shelters with art and / or deposit	Rock shelter sites include rock overhangs, shelters or caves, and generally occur on, or next to, moderate to steeply sloping ground characterised by cliff lines and escarpments. These naturally formed features may contain rock art, stone artefacts or midden deposits and may also be associated with grinding grooves.	Nil: This site type will only occur where suitable sandstone exposures or overhangs possessing sufficient sheltered space exist. Sandstone exposures and overhangs do not occur within the study area.
Scarred trees	Trees with cultural modifications	Nil: Scarred trees are the most common site type within the vicinity of the study area. The study area does not contain vegetation, therefore scarred trees will not be present.
Grinding grooves	Grooves created in stone platforms through ground stone tool manufacture.	Nil: Suitable horizontal sandstone rock outcrops do not occur within the study area, and are more likely to be present along the banks of the Shoalhaven River.

Step 5: Further investigations and impact assessment

This assessment concludes that the study area possesses low archaeological potential to contain Aboriginal sites due to the landscape context in which the study area is situated (Figure 4). Though the tidal flat upon which the site is located would have been utilized for resource gathering, it is considered unlikely that deposits or objects would have been preserved due to high levels of erosion along the western bank of pig island. The proposed works are therefore considered unlikely to have an impact on Aboriginal cultural heritage values. Further assessment is not warranted based upon the completion of Steps 1 to 4 of the code (Figure 5).

The proposed works may proceed with caution, subject to the following recommendations:

- All Aboriginal objects and Places are protected under the NPW Act. It is an offence to knowingly disturb an Aboriginal site without a consent permit issued by the Environment, Energy and Science (EES). Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist. If the find is determined to be an Aboriginal object the archaeologist will provide further recommendations. These may include notifying the EES and Aboriginal stakeholders.
- Aboriginal ancestral remains may be found in a variety of landscapes in NSW, including middens and sandy or soft sedimentary soils. If any suspected human remains are discovered during any activity you must:
 - Immediately cease all work at that location and not further move or disturb the remains.
 - Notify the NSW Police and EES's Environmental Line on 131 555 as soon as practicable and provide details of the remains and their location.
 - Not recommence work at that location unless authorised in writing by EES.

Please contact me if you have any enquiries.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ashleigh'.

Ashleigh Keevers-Eastman
Project Archaeologist

References

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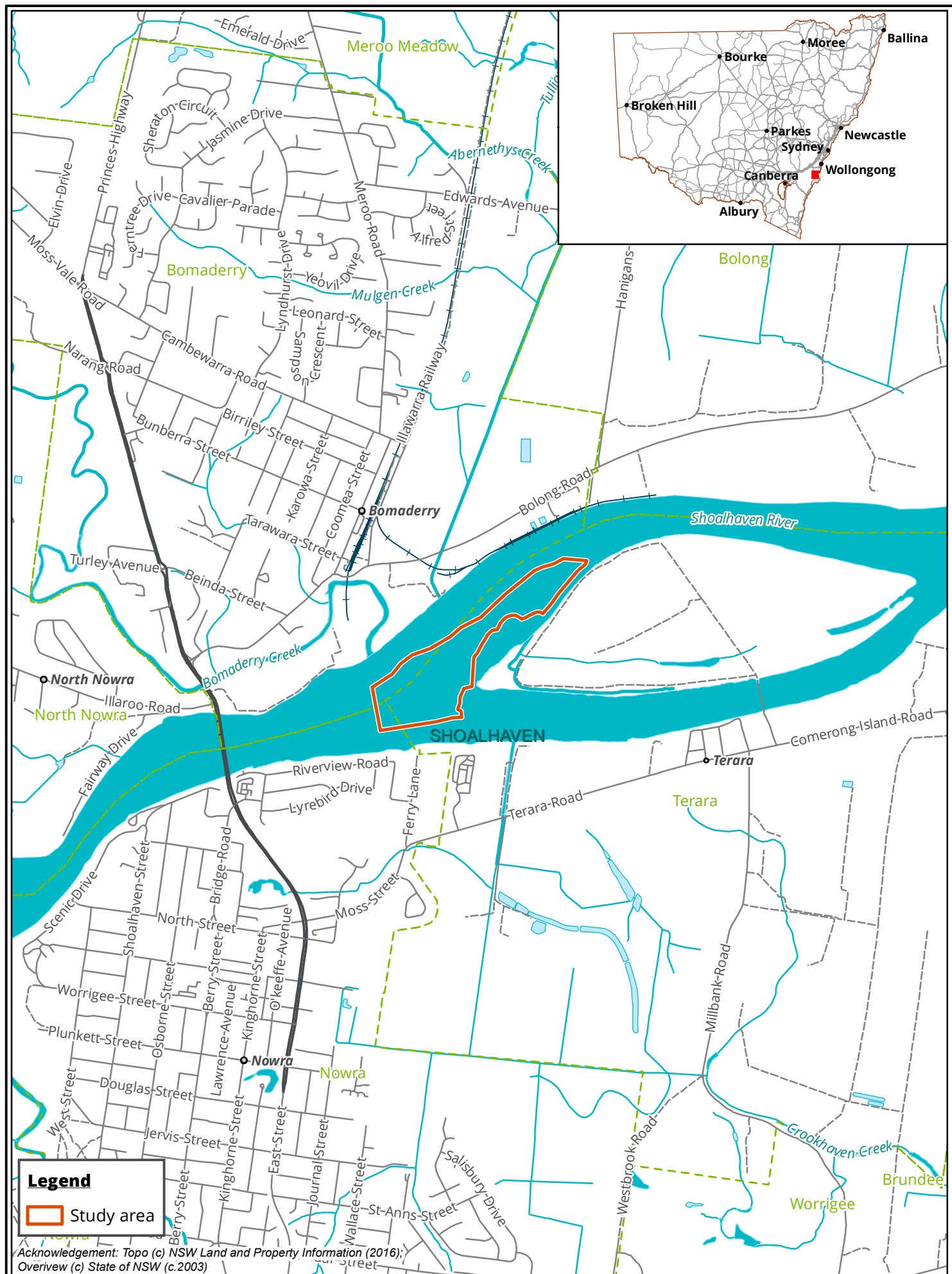
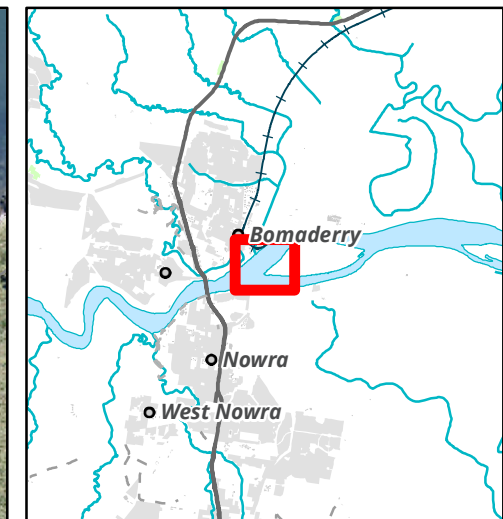


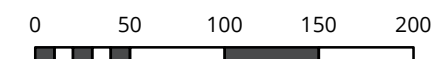
Figure 1 Location of the study area



Legend

- Study area
- Lot

Figure 2 Study area detail

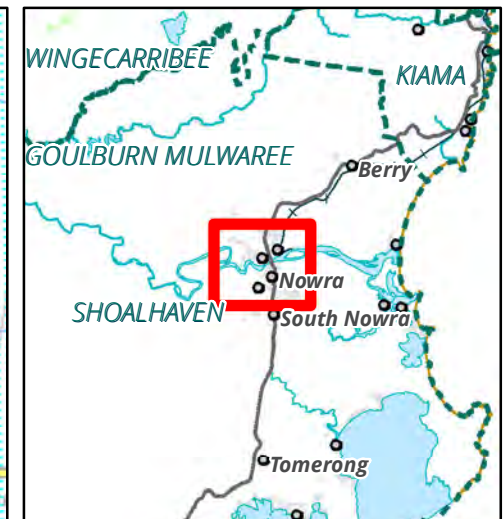
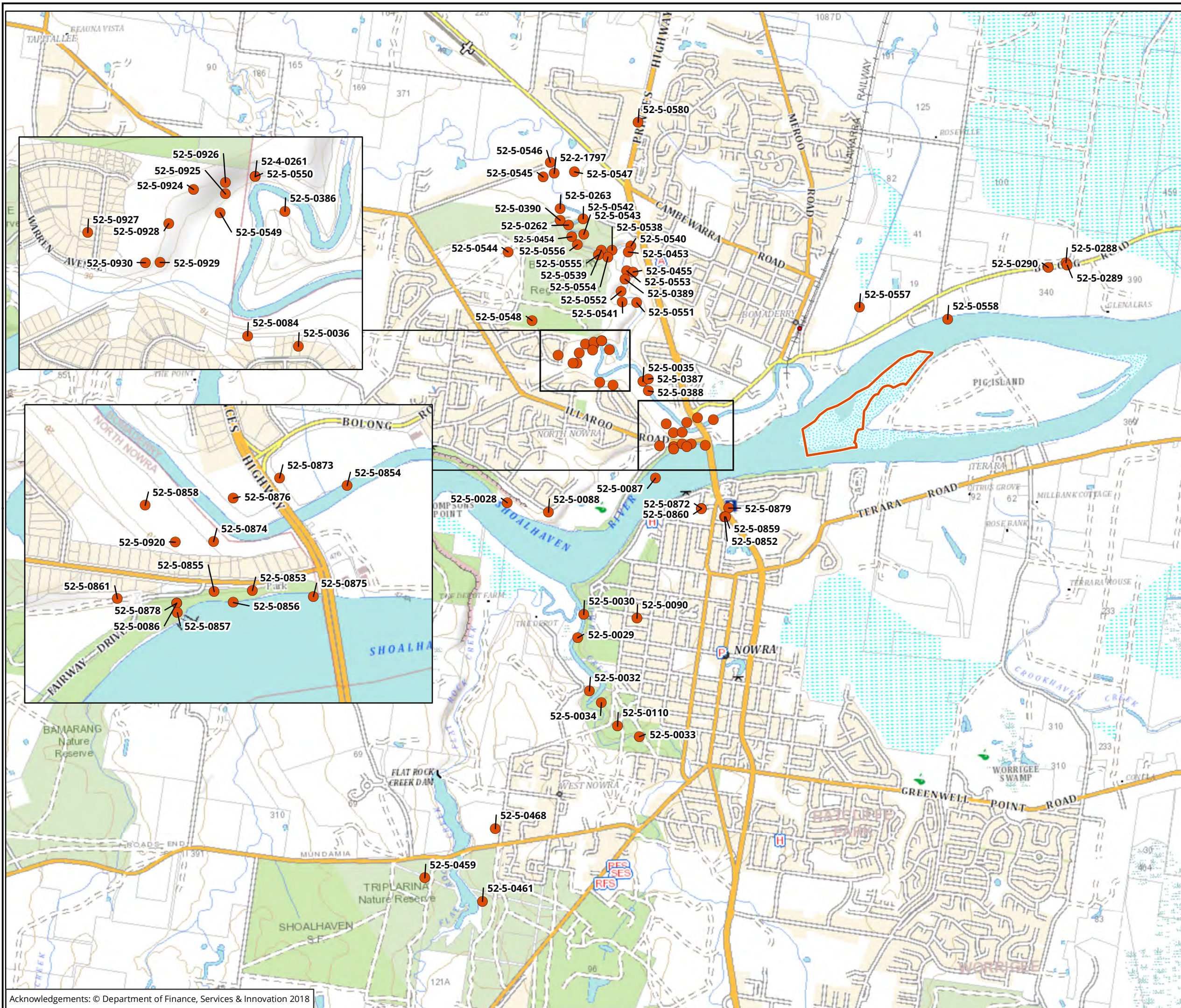


Metres
Scale: 1:4,000 @ A3
Coordinate System: GDA 1994 MGA Zone 56



Albury, Ballarat, Melbourne,
Newcastle, Sydney, Wangaratta & Wollongong

Matter: 31375
Date: 20 January 2020,
Checked by: AKE, Drawn by: AEDM, Last edited by: amurray
Location: P:\31300s\31375\Mapping\31375_F2_StudyArea



Legend

- Study area
- AHIMS record

Figure 3 AHIMS sites in the vicinity of the study area

NOT TO BE MADE PUBLIC

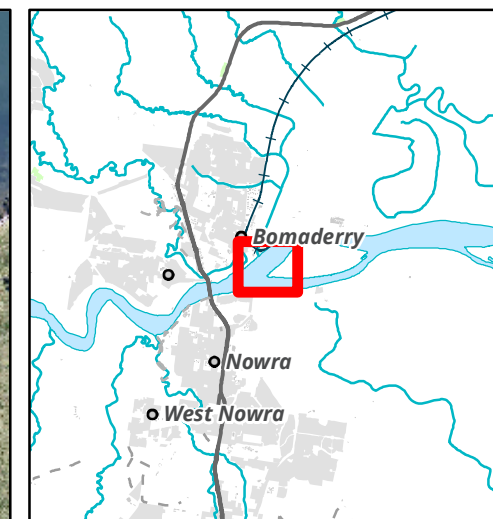
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Scale: 1:30,000 @ A3
Coordinate System: GDA 1994 MGA Zone 56

biosis
Biosis Pty Ltd

Albury, Ballarat, Melbourne,
Newcastle, Sydney, Wangaratta & Wollongong

Matter: 31375
Date: 17 January 2020,
Checked by: AKE, Drawn by: AEDM, Last edited by: amurray
Location: P:\31300s\31375\mapping\31375_F3_AHIMS



Legend

Study area

Archaeological potential

Low potential

Figure 4 Results of the desktop assessment

0 50 100 150 200
Metres

Scale: 1:4,000 @ A3
Coordinate System: GDA 1994 MGA Zone 56



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Matter: 31375
Date: 20 January 2020,
Checked by: AKE, Drawn by: AEDM, Last edited by: amurray
Location: P:\31300s\31375\Mapping\31375_F4_ArchPotential