

ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT

BARK HUT ROAD REZONING



WOOLGOOLGA, NSW

PREPARED FOR VADEJIL PTY LTD



Report Reference:

Hill, T, P. Fowler and T. Robins 2018 *Bark Hut Road Woolgoolga: Aboriginal Cultural Heritage Assessment*. Everick Heritage Consultants Pty Ltd. Unpublished report prepared for Vadejil Pty Ltd.

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Document Status:

Rev No.	Version	Author(s)	Date	Authorised
0	Draft	T. Hill	27.09.2017	T. Robins
1	Draft	T. Hill	27.10.2017	T. Robins
2	Draft	T. Hill	30.10.2017	T. Robins
3	Draft	T. Hill	30.11.2017	T. Robins
4	Draft	T. Hill	14.12.2017	T. Robins
5	Draft	T. Hill	23.1.2018	T. Robins
6	Draft	T. Hill	15.02.2018	T. Robins

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EXECUTIVE SUMMARY

This report provides the results of an Aboriginal Cultural Heritage Assessment for the proposed rezoning of land at Bark Hut Road, Woolgoolga NSW (the 'Project'). The lands subject to assessment include Lot 202 DP874273 and are approximately 25.55 hectares in area. The planning proposal is to rezone the land from RU1 Primary Production to R 2 Low density residential. The intent of the archaeological investigation is to identify Aboriginal and historical archaeological or cultural heritage constraints for the Project, and if found, establish ways in which any impacts could be mitigated or avoided. Everick Heritage Consultants (the 'Consultant') was commissioned by Keiley Hunter on behalf of Vadejil Pty Ltd (the 'Proponent') to undertake this assessment. It is understood that this assessment will be used in support of a Development Application to the Coffs Harbour City Council ('CHCC').

The brief for this Project was to undertake an Aboriginal and European heritage assessment of suitable standard to accompany the Development Application to the CHCC. In accordance with the relevant administrative and legislative standards for New South Wales (see Section 2 below), the methods employed in this assessment included:

- a) a search of relevant heritage registers;
- b) a site inspection undertaken by Senior Archaeologist Tim Hill on 1 March 2016;
- c) a review of the archaeological and cultural heritage assessments pertinent to the potential heritage values associated with the Project Area;
- d) review historical aerial photographs of the Project Area; and
- e) assessment of the potential for the Project Area to contain significant Aboriginal heritage and the impact on the Project may have on said heritage, consistent with the OEH *Due Diligence Code for the Protection of Aboriginal Objects in NSW* (2010).

As a result of the desktop study, field inspections, Aboriginal community consultation and archaeological investigation of the Project Area, the following was found.

- Two artefacts (Bark Hut Road IF 01 #22-1-0503 and Bark Hut Road IF 02 #22-1-0504) were observed on the access trail immediately south of the Bark Hut Road entrance to the Project Area. These consisted of stone flakes derived from Greywacke and Rhyolite, which are common in the Woolgoolga area. Given the location of the artefacts on an area of upper slope, it is likely that the artefacts are a secondary deposit from the main campsite, which is identified in the Council Reserve to the immediate west of the access road. This area will not be part of the rezoning application and as such this ridge crest was not surveyed.



- Having consideration for the landscape context of the Project Area and the history of disturbance it is considered unlikely that the Project Area will contain Aboriginal sites of high or moderate conservation value. The Project Area is unlikely to contain burials or middens and does not contain scarred or modified trees. Whilst some historic campsites are known in the general vicinity the Project Area none are known within the Project Area. No Mythological or ceremonial sites are known to occur within the Project Area, however it is noted that the ridge-crest may have been utilised as a pathway between the coast and hinterland.
- There is very little topsoil material in the upper slope and the artefacts were identified on the compacted surface of the trail. It is considered unlikely that the surrounding soils would contain Aboriginal objects. However, having consideration for the Due Diligence Code of Practice requirements the entire ridge crest is considered to be a Potential Archaeological Deposit (PAD). This includes a small ridge crest in the north-east corner of the Project Area.
- A second PAD was identified in the southern portion of the Project Area comprising a knoll to the west of the water storage dam however no Aboriginal objects were identified on the knoll. However, the presence of topsoil on the knoll provides an indication that there is the potential for an Aboriginal stone artefact scatter to occur on the knoll.

On the basis of the results and discussed above, the following management recommendations are provided:

Recommendation 1: Cultural Heritage Induction

It is recommended that a cultural heritage induction is provided by representatives of the RAPs for all senior civil works staff involved in the initial removal of topsoil from the ridge crests identified by the ACHAR. This induction should provide;

- an overview of the nature and extent of archaeological materials within the Project Area;
- the broader cultural context of the site and its significance to Aboriginal people;
- an outline of relevant legislation; and
- an outline of the AHIP salvage procedure and an outline of an appropriate Finds Procedure.

Recommendation 2: Application for an Aboriginal Heritage Impact Permit (AHIP)

It is recommended that prior to commencement of works (issue of Construction Certificate) that the proponent apply for an Aboriginal Heritage Impact Permit (AHIP) for salvage of known Aboriginal Objects from within the Project Area (Bark Hut Road IF 01 #22-1-0503 and Bark Hut Road IF 02 #22-1-0504). This AHIP should be subject to the following conditions relating to the salvage program:



- Cultural heritage induction for all ground clearance contractors.
- Collection of surface artefacts by Raps and temporary storage at CHDLALC.
- Monitoring of topsoil removal and collection of artefacts from the ridge crest and temporary storage at CHDLALC.
- The monitoring should be in an area 20m below the access track and along the apex of the ridge to the upper/ mid slope. All the way down to Creek.
- Permanent burial of artefacts within a reserve or garden area nearby.
- The monitoring should also include the ridge area in the north-east of the Lot.

Recommendation 3: Southern PAD

It is noted that the site inspection did not identify any Aboriginal objects within the southern PAD area, defined by the knoll to the west of the water storage dam. Having consideration for the potential of this PAD to contain Aboriginal sites of high or moderate conservation value it is recommended that the minimum management response for this PAD is a cultural heritage induction and the application of an Aboriginal Find Procedure.

If it is suspected that Aboriginal material has been uncovered as a result of development activities within the Project Area:

- a) work in the surrounding area is to stop immediately;
- b) a temporary fence is to be erected around the site, with a buffer zone of at least 10 metres around the known edge of the site;
- c) an appropriately qualified archaeological consultant is to be engaged to identify the material; and
- d) if the material is found to be of Aboriginal origin, the Aboriginal community is to be consulted in a manner as outlined in the *ACHCRP Guidelines* (2010).

Should the material be identified as an Aboriginal object and the proposed works cannot be amended to avoid the Aboriginal site an Aboriginal Heritage Impact Permit (AHIP) would be required prior to recommencement of works in the vicinity of the site. Consultation with stakeholders from the Aboriginal community would be required as a part of the AHIP application process.

It is recommended that these requirements are formalised within a Cultural Heritage Management Plan agreed to by Registered Aboriginal Parties prior to issue for the Development Application for subdivision to allow an opportunity for RAPs to better consider the full impacts of proposed works.



Recommendation 4: Aboriginal Human Remains

Although it is unlikely that Human Remains will be located at any stage during earthworks within the Project Area, should this event arise it is recommended that all works must halt in the immediate area to prevent any further impacts to the remains. The Site should be cordoned off and the remains themselves should be left untouched. The nearest police station (Coffs Harbour), the Coffs Harbour Local Aboriginal Land Council and the OEH Regional Office (Coffs Harbour) are all to be notified as soon as possible. If the remains are found to be of Aboriginal origin and the police do not wish to investigate the Site for criminal activities, the Aboriginal community and the OEH should be consulted as to how the remains should be dealt with. Work may only resume after agreement is reached between all notified parties, provided it is in accordance with all parties' statutory obligations.

It is also recommended that in all dealings with Aboriginal human remains, the Proponent should use respectful language, bearing in mind that they are the remains of Aboriginal people rather than scientific specimens.

Recommendation 5: Conservation Principles

It is recommended that all effort must be taken to avoid any impacts on Aboriginal Cultural Heritage values at all stages during the development works. If impacts are unavoidable, mitigation measures should be negotiated between the Proponent, OEH and the Aboriginal community.



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DEFINITIONS

The following definitions apply to the terms used in this report:

Aboriginal Object means 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](#).

Aboriginal Place means any place declared to be an Aboriginal place (under s.84 of the NPW Act) by the Minister administering the NPW Act, by order published in the NSW Government Gazette, because the Minister is of the opinion that the place is or was of special significance with respect to Aboriginal culture. It may or may not contain Aboriginal Objects.

ACHCRP Guidelines means the OEH *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (2010).

AHIP means Aboriginal Heritage Impact Permit

Code of Practice means the OEH *Code of Practice for Archaeological Conduct in New South Wales* (2010).

Consultant means qualified archaeological staff and/or contractors of Everick Heritage Consultants Pty Ltd.

Development Area means those lands within the Project Area subject to the Proposed Works.

Due Diligence Code means the OEH *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (2010).

LALC means Local Aboriginal Land Council

LEP means the Local Environment Plan

NPW Act means the *National Parks and Wildlife Act 1974* (NSW).

NPW Regulations means the *National Parks and Wildlife Regulations 2009* (NSW).

OEH means the New South Wales Office of Environment and Heritage.

Project means the proposed future development of the Project Area for a low density residential subdivision.

Project Area means the land subject to this assessment being Lot 202 DP 874273, located at Bark Hut Road Woolgoolga NSW.

Proposed Works means all activities associated with proposed future ground disturbance within the Development Area, including activities undertaken by subsequent landholders.

Proponent means Vadejil Pty Ltd, and all associated employees and contractors and subcontractors of the same.



1. INTRODUCTION

1.1 Purpose of the Cultural Heritage Assessment

This report provides the results of an Aboriginal Cultural Heritage Assessment for the proposed rezoning of land at Bark Hut Road, Woolgoolga NSW (the 'Project'). The lands subject to assessment include Lot 202 DP874273 and are approximately 25.55 hectares in area (Figure 1). The planning proposal is to rezone the land from RU1 Primary Production to R2 Low density residential.

The intent of the archaeological investigation is to identify Aboriginal and historical archaeological or cultural heritage constraints for the Project, and if found, establish ways in which any impacts could be mitigated or avoided.

1.2 Proponent, Project Brief & Methodology

Everick Heritage Consultants (the 'Consultant') was commissioned by Keiley Hunter on behalf of Vadejil Pty Ltd (the 'Proponent') to undertake this assessment. It is understood that this assessment will be used in support of a Development Application to the Coffs Harbour City Council ('CHCC').

The brief for this Project was to undertake an Aboriginal and European heritage assessment of suitable standard to accompany the Development Application. In accordance with the relevant administrative and legislative standards for New South Wales (see Section 2 below), the methods employed in this assessment included:

- a) a search of relevant heritage registers;
- b) a site inspection undertaken by Senior Archaeologist Tim Hill on 01 March 2016;
- c) a review of the archaeological and cultural heritage assessments pertinent to the potential heritage values associated with the Project Area; and
- d) assessment of the potential for the Project Area to contain significant Aboriginal heritage and the impact on the Project may have on said heritage, consistent with the OEH *Due Diligence Code for the Protection of Aboriginal Objects in NSW* (2010).



The methods used for this assessment are in compliance with the OEH *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales 2010* and all relevant legislation as described in Section 2 of this Report.

1.3 Description of Proposal

The current proposal is to rezone the Project Area from RU2 (Rural Landscape) to R2 (Low Density Residential) for the purpose of developing the land into a residential subdivision. The average lot size will be approximately 600m². The overall development will be centred around the Woolgoolga sports field development (Figure 2 and Figure 3). The Proposed Works also include connection of all utilities and construction of roads, paths and landscaping.

1.4 Report Authorship

The desktop study was undertaken by Senior Archaeologist Tim Hill, assisted by Archaeologist Pauline Fowler. The field inspection was conducted by Senior Archaeologist Tim Hill. This report was written by Tim Hill and Everick Director Tim Robins.

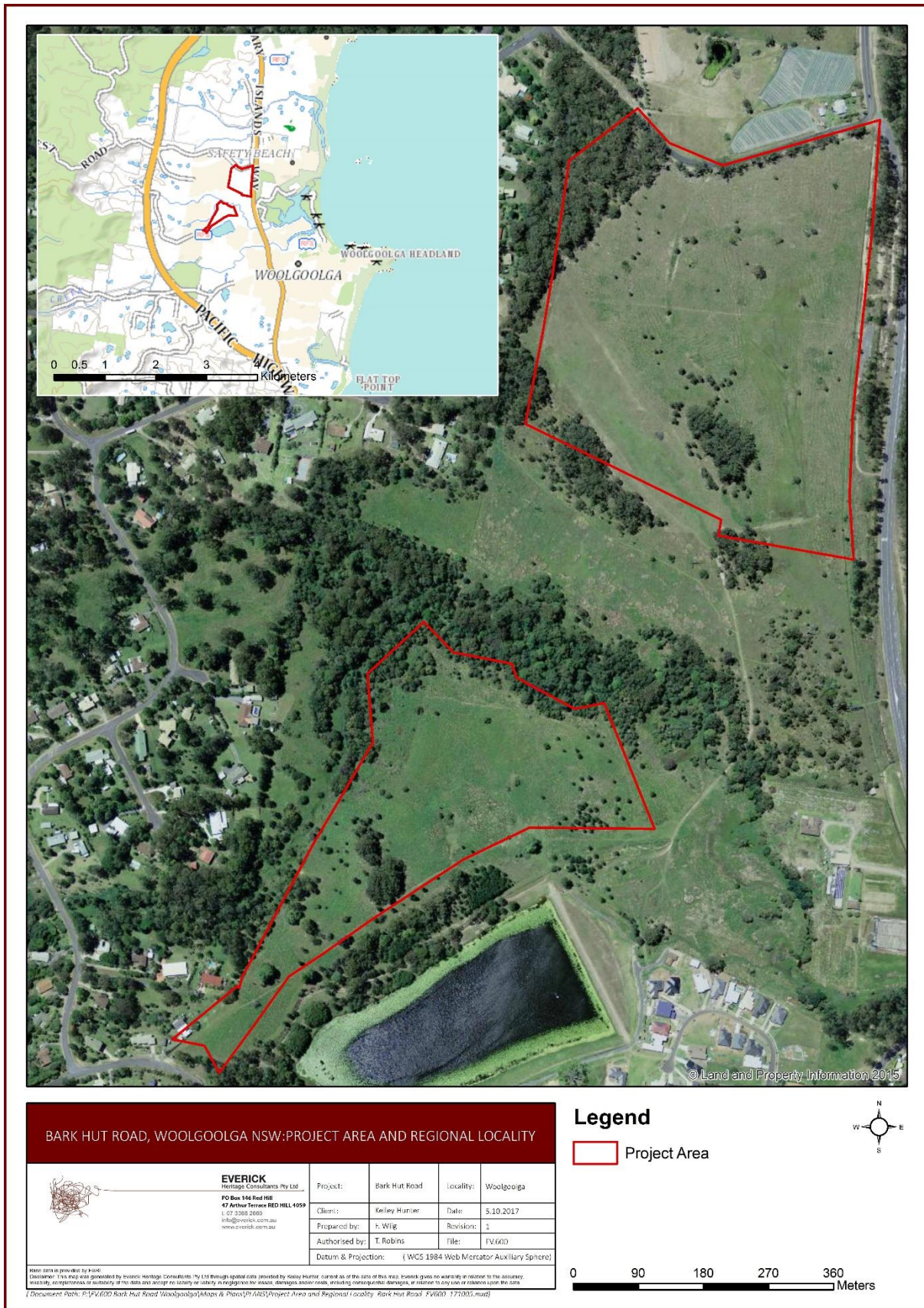


Figure 1: Regional Locality of the Project Area.





Figure 2: Proposed Lot Layout (Northern section)

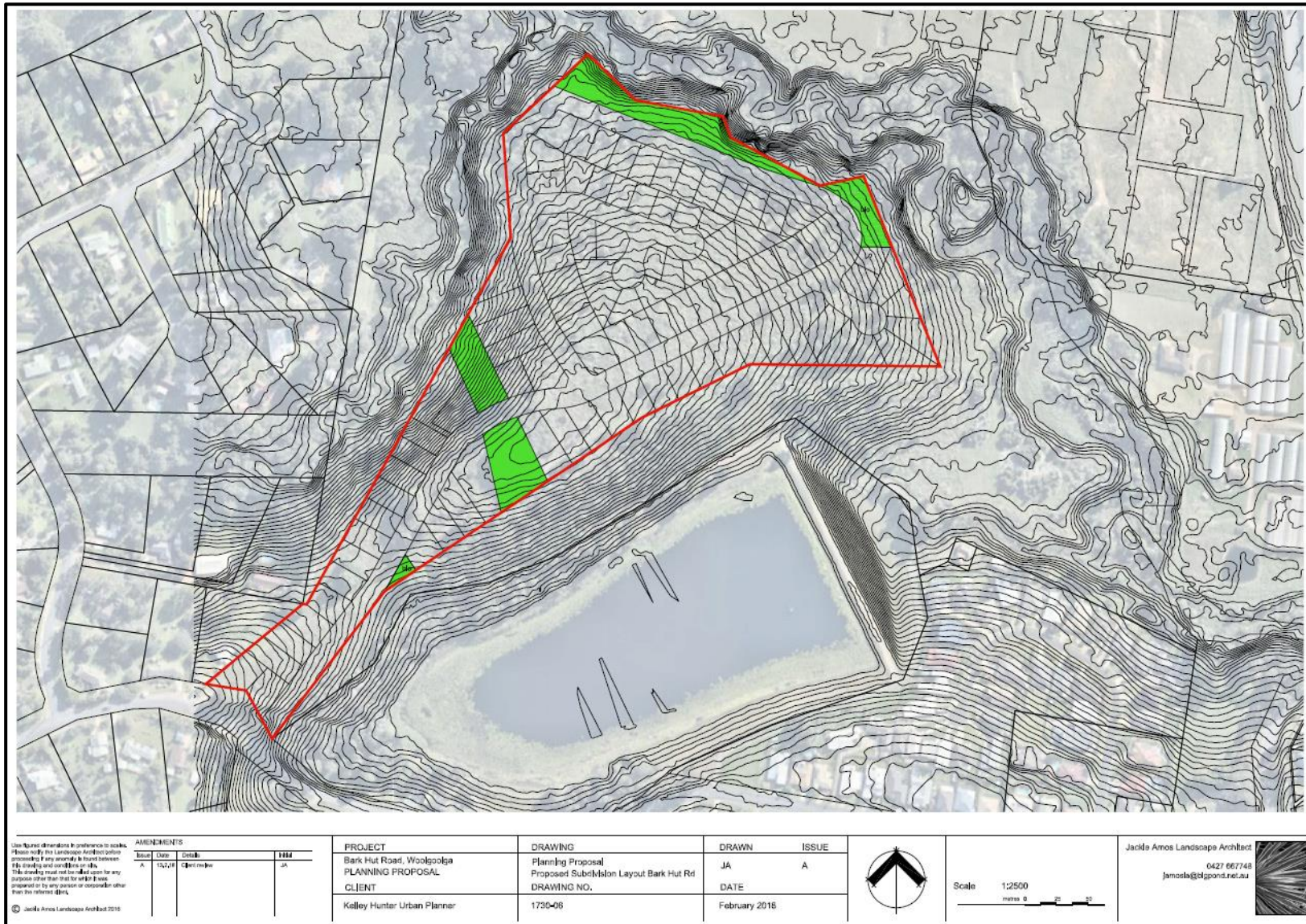


Figure 3: Proposed Lot Layout (Southern Section).



2. LEGISLATIVE AND PLANNING CONTEXT

The following legislation provides the context for cultural heritage in NSW: the *National Parks and Wildlife Act 1974* (NSW) ('NPW Act'), the *Environmental Planning and Assessment Act 1979* (NSW) ('EP&A Act') and the *Heritage Act 1977* (NSW). The Commonwealth also has a role in the protection of nationally significant cultural heritage through the *Environmental Protection and Biodiversity Conservation Act 1999* (Cth), *The Protection of Movable Cultural Heritage Act 1986* (Cth) and the *Historic Shipwrecks Act 1976* (Cth).

For the purposes of this assessment it is the state and local legislation that is relevant. The consent authorities will be the CHCC and, where a referral agency is required to be reported to, the OEH. Approval from the OEH will be required should the Project propose to impact on identified Aboriginal Objects. The information below lists the legislative and policy framework within which this assessment is set.

2.1 The *National Parks and Wildlife Act 1974* (NSW) and the *National Parks and Wildlife Regulations 2009* (NSW)

The NPW Act is the primary legislation concerning the identification and protection of Aboriginal cultural heritage. It provides for the management of both Aboriginal Objects and Aboriginal Places. Under the NPW Act, an Aboriginal Object is any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area, regardless of whether the evidence of habitation occurred before or after non-Aboriginal settlement of the land. This means that every Aboriginal Object, regardless of its size or seeming isolation from other Objects, is protected under the Act.

An Aboriginal Place is an area of particular significance to Aboriginal people which has been *declared* an Aboriginal Place by the Minister. The drafting of this legislation reflects the traditional focus on Objects, rather than on areas of significance such as story places and ceremonial grounds. However, a gradual shift in cultural heritage management practices is occurring towards recognising the value of identifying the significance of areas to Indigenous peoples beyond their physical attributes.

With the introduction of the *NPW Amendment Act 2010* (NSW) the former offence provisions under Section 86 of 'disturbing', 'moving', 'removing' or 'taking possession' of Aboriginal Objects or Places have been replaced by the new offence of 'harming or desecrating'. The definition of 'harm' is 'destroying, defacing or damaging an Object'. Importantly in the context of the management recommendations in this assessment, harm to an Object that is 'trivial or negligible' will not constitute an offence.



The new amendments also significantly strengthen the penalty provisions. The issue of intent to harm Aboriginal cultural heritage has been formally addresses by separating it from inadvertent harm. The penalty for individuals who inadvertently harm Aboriginal Objects is up to \$55,000, while for corporations it is \$220,000. Also introduced is the concept of '*circumstances of aggravation*' which allows for harsher penalties (up to \$110,000) for individuals who inadvertently harm Aboriginal heritage in the course of undertaking a commercial activity or have a record for committing similar offences. For those who knowingly harm Aboriginal cultural heritage, the penalty will rise substantially. The maximum penalty is set at \$275,000 or one year imprisonment for individuals, while for corporations it will rise to \$1,100,000.

Where a land user has or is likely to undertake activities that will harm Aboriginal Objects, the Director General (OEH) has a range of enforcement powers, including stop work orders, interim protection orders and remediation orders.

The NPW Act also includes a range of defence provisions for unintentionally harming Aboriginal Objects:

- a) Undertaking activities that are prescribed as 'Low Impact'.
- b) Acting in accordance with the new Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales (2010) ('Due Diligence Code');
- c) Using a consulting archaeologist who correctly applies the OEH Code of Practice for Archaeological Conduct in New South Wales (2010); and
- d) Acting in accordance with an Aboriginal Heritage Impact Permit (AHIP).

2.1.1 '*Low Impact Activities*'

The NPW Regulations allow for a range of low impact activities to be undertaken without the need to consult the OEH or a consulting archaeologist. Generally, those who undertake activities of this nature will not be committing an offence, even if they inadvertently harm Aboriginal objects. These activities include:

- a) maintenance such as on existing roads and tracks, or on existing utilities such as underground power cables and sewage lines;
- b) farming and land Management for land previously disturbed, activities such as cropping, grazing, bores, fencing and erosion control;
- c) removal of dead or dying vegetation (only if there is minimal ground disturbance);
- d) environmental rehabilitation such as weed removal, bush regeneration;
- e) development in accordance with a Development Certificate issued under the EPA Act 1979 (provided the land is previously disturbed);



- f) downhole logging, sampling and coring using hand held equipment; and
- g) geochemical surveying, seismic surveying, costeaming or drilling.*

*This defence is only available where the land has been disturbed by previous activity. Disturbance is defined as a clear and observable change to the land's surface, including but not limited to land disturbed by the following: soil ploughing; urban development; rural infrastructure (such as dams and fences); roads, trails and walking tracks, pipelines, transmission lines; and storm water drainage and other similar infrastructure.

2.2 Due Diligence Code of Practice for the Protection of Aboriginal Objects

The Due Diligence Code has been applied in Section 10 of this assessment. It operates by posing a series of questions for land users before they commence development. These questions are based around assessing previous ground disturbance. An activity will generally be unlikely to harm Aboriginal Objects where it:

- a) will cause no additional ground disturbance;
- b) is in a developed area; or
- c) is in a significantly disturbed area.

Where these criteria are not fulfilled, further assessment for Aboriginal cultural heritage will typically be required prior to commencing the activity.

2.3 The ACHCRP (2010)

The *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (2010) ('ACHCRP') provide an acceptable framework for conducting Aboriginal community consultation in preparation for impacts to Aboriginal cultural heritage. Proponents are required to follow them where a Project is likely to impact on cultural heritage and where required by Council.

It is recommended by the OEH that all cultural heritage assessments involve this level of consultation, although it is not strictly a requirement unless it meets the above criteria. The ACHCRP Guidelines typically take a minimum of 90 days to complete. However, in complicated Projects this period may need to be extended by several months. The Guidelines require public notice of the assessment, preparation of a proposed methodology, undertaking site meetings and excavations where required, the production of a draft report, which is distributed to the registered Aboriginal groups and the production of a final report.



Given the low archaeological potential of the current Project Area, it has been concluded that following the ACHCRP Guidelines is not warranted for this assessment.

2.4 The Coffs Harbour Local Environmental Plan 2013

The Coffs Harbour LEP 2013 provides statutory protection for items already listed as being of heritage significance (Schedule 5), items that fall under the ambit of the *Heritage Act 1977* (NSW) and Aboriginal Objects under the *National Parks and Wildlife Act 1974* (NSW). It aims to ensure best practice components of the heritage decision making process are followed.

For listed heritage items, or a building, work, relic or tree and heritage conservation areas, the following action can only be carried out with the consent of the Coffs Harbour City Council (CHCC):

- a) demolishing or moving a heritage item or a building, work, relic or tree within a heritage conservation area;
- b) altering a heritage item or a building, work, relic, tree or place within a heritage conservation area, including (in the case of a building) making changes to the detail, fabric, finish or appearance of its exterior;
- c) altering a heritage item that is a building by making structural changes to its interior;
- d) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed;
- e) disturbing or excavating a heritage conservation area that is a place of Aboriginal heritage significance;
- f) erecting a building on land on which a heritage item is located or that is within a heritage conservation area; and
- g) subdividing land on which a heritage item is located or that is within a heritage conservation area.

In addition, CHCC may not grant development consent without considering the effect the proposed development will have on the heritage significance of heritage item or heritage conservation area concerned.

Furthermore, in regards to Aboriginal heritage significance (Part 5.10.8) the consent authority must, before granting consent under this clause to the carrying out of development in a place of Aboriginal heritage significance:

- a) consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place; and



- b) notify the local Aboriginal communities (in such way as it thinks appropriate) about the application and take into consideration any response received within 28 days after the notice is sent.

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3. ABORIGINAL COMMUNITY CONSULTATION

3.1 Traditional Owner Knowledge

The Aboriginal Stakeholders are the primary determinants of the significance of their cultural heritage. Members of the Aboriginal community will be consulted, and will continue to be consulted, with regard to their concerns not only about known archaeological sites in the region, but also about cultural values such as areas with historic and spiritual significance, and other values relating to flora and fauna of the area. Everick recognises that there may be Traditional Owner knowledge associated with the region that will have to be treated in a confidential manner.

3.2 The Consultation Process

Everick undertook a consultation process with the Aboriginal community in accordance with the *OEH Aboriginal Cultural Heritage Consultation Requirements for Proponents (2010)* (ACHCRP). A summary of the process undertaken is as follows:

- a) correspondence to the Office of Environment and Heritage (dated 6 October 2017);
- b) correspondence to The Registrar, *Aboriginal Land Rights Act 1983* for a list of Aboriginal Owners (dated 6 October 2017);
- c) correspondence to NTSCORP Limited (dated 6 October 2017); and
- d) correspondence to Coffs Harbour City Council (dated 6 October 2017).

Written correspondence was forwarded on 2 November 2017 to the following individuals and organisations providing an opportunity to be involved in the assessment project:

- Garby Elders,
- Coffs Harbour and District Local Aboriginal Land Council,
- Garlambirla Guuyu-girrwa Aboriginal Corporation,
- Mudjay Elders,
- Bagawa Birra Murri Aboriginal Corporation,
- Yarrawarra Aboriginal Corporation,
- Mimi Mothers Aboriginal Corporation,



- Muurrbay Aboriginal Language and Cultural Cooperative Ltd,
- Ciaron Dunn,
- Gumbayngirr Native Title Group,
- Gumbayngirr Elders,
- Ngurrala Aboriginal Corporation,
- Uncle Thomas Kelly and Family,
- Derrick Vale Sr.,
- Natalene Mercy,
- Jagun Elders; and
- Norm Archibold.

A public advertisement was placed in the Coffs Coast Advocate on 4 November 2017 (Figure 4) with a closing date of 12 April 2016.

Aboriginal Cultural Heritage Study Registration of Interest

Everick Heritage Consultants Pty Ltd (ABN 78 102 206 682) is seeking to consult with interested Aboriginal persons in preparation for the proposed rezoning project at Bark Hut Road, Woolgoolga, NSW. The Study Area consists of Lot 202 DP874273, Woolgoolga (west of Solitary Islands Way). Consultation will be undertaken in preparation for an Aboriginal Heritage Impact Permit application.

What do you need to do?

Aboriginal persons who hold cultural knowledge of the region are invited to register their interest in writing with:

Everick Heritage Consultants
PO Box 200
COFFS HARBOUR NSW 2450
or t.hill@everick.com.au

When must registration be received?

Registration must be received by Monday 20 November 2017.

Figure 4: Copy of advertisement placed in Coffs Coast Advocate 4 November 2017

As a result of the consultation process the following list of Registered Aboriginal Parties (RAPs) was developed:

- Coffs Harbour and District Local Aboriginal Land Council; and
- Jagun Elders (via email see Appendix 3).



Everick Heritage Consultants believe that this Community Consultation process was adequate for the current project and as such has utilised this list as the basis for consultation for the current assessment.

A letter was forwarded to OEH and Coffs Harbour and District Local Aboriginal Land Council on 29 November 2017 notifying them of the outcomes of the consultation process (Appendix 4).

A consultation meeting was held with Mr Ian Brown and Ms Luana Ferguson (CHDLALC) and Uncle Tony Perkins (Jagun Elders) on 18 January 2018 to discuss the results of the initial inspection and provide advice and comment on the proposed management response for the project. An invitation to attend this meeting was provided to the Garby Elders however Uncle Milton Duroux and MR Tony Dootson were not able to attend the meeting. The notes from the meeting and email responses from RAPs are provide in Appendix D.

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4. ABORIGINAL CULTURAL HERITAGE DESKTOP REVIEW

4.1 The OEH Aboriginal Heritage Information Management System (AHIMS)

Care should be taken when using the AHIMS database to reach conclusions about site prevalence or distribution. For example, a lack of sites in a given area should not be seen as evidence that the area was not occupied by Aboriginal people. It may simply be an indication that it has not been surveyed for cultural heritage, or that the surveys were undertaken in areas of poor surface visibility. Further to this, care needs to be taken when looking at the classification of sites. For example, the decision to classify a site an artefact scatter containing shell rather than a midden can be a highly subjective exercise, the threshold for which may vary between archaeologists.

An extensive search was conducted on 12 January 2017 of the OEH AHIMS for the Project Area with a 50 metre buffer (ID 261963) which returned 2 Aboriginal site listings. Site features include artefacts and an Aboriginal Resource and Gathering site (See Table 1 and Figure 5). These sites are located within a proposed reserve area associated with Poundyard Creek and the Woolgoolga Sports Field development and will not be affected by the rezoning proposal.

Table 1: AHIMS Search Results

<i>Site Number</i>	<i>Name</i>	<i>Easting</i>	<i>Northing</i>	<i>Site 'Features'</i>
22-1-0152	C1_Poundyard Creek	517710	6669940	Artefact (1)
22-1-0408	West Woolgoolga Sports Field	517856	6669964	Artefact (2)



Figure 5: AHIMS extensive search results.



4.2 Other Heritage Registers

The following heritage registers were accessed on 27 September 2017:

- **The National Heritage List** (Australian Heritage Council): Contains no Aboriginal heritage listings within or within close proximity to the Project Area.
- **Commonwealth Heritage List** (Australian Heritage Council): Contains no Aboriginal heritage listings within or within close proximity to the Project Area.
- **Register of the National Estate** (Australian Heritage Council): Contains no Aboriginal heritage listings within or within close proximity to the Project Area.
- **The State Heritage Register** (NSW Heritage Office): Contains no Aboriginal heritage listings under Section 1 (Aboriginal Places listed under the NPW Act) within or within close proximity to the Project Area;
- **The Register of the National Trust of Australia:** Contains no listings within or within close proximity to the Project Area.
- **Coffs Harbour Local Environment Plan 2013 ('LEP'):** Contains no listings within or within close proximity to the Project Area.



5. LANDSCAPE CONTEXT

5.1 Environment Locality

5.1.1 Topography

Topography can generally be described as gently slopes and ridges. Elevation of the site varies from approximately RL 9.5m AHD, to around RL 38.0 m AHD. Surface slope is relatively moderate, typically around 10%, with isolated areas getting as steep as 25% and as flat as 1%. The northern portion of the site is situated on the southern side of a ridge, and consequently, falls to the south-east, to a well defined gully running south to Poundyard Creek. The southern portion of the site is located on a knoll, and as such the land falls away from the top of the feature.

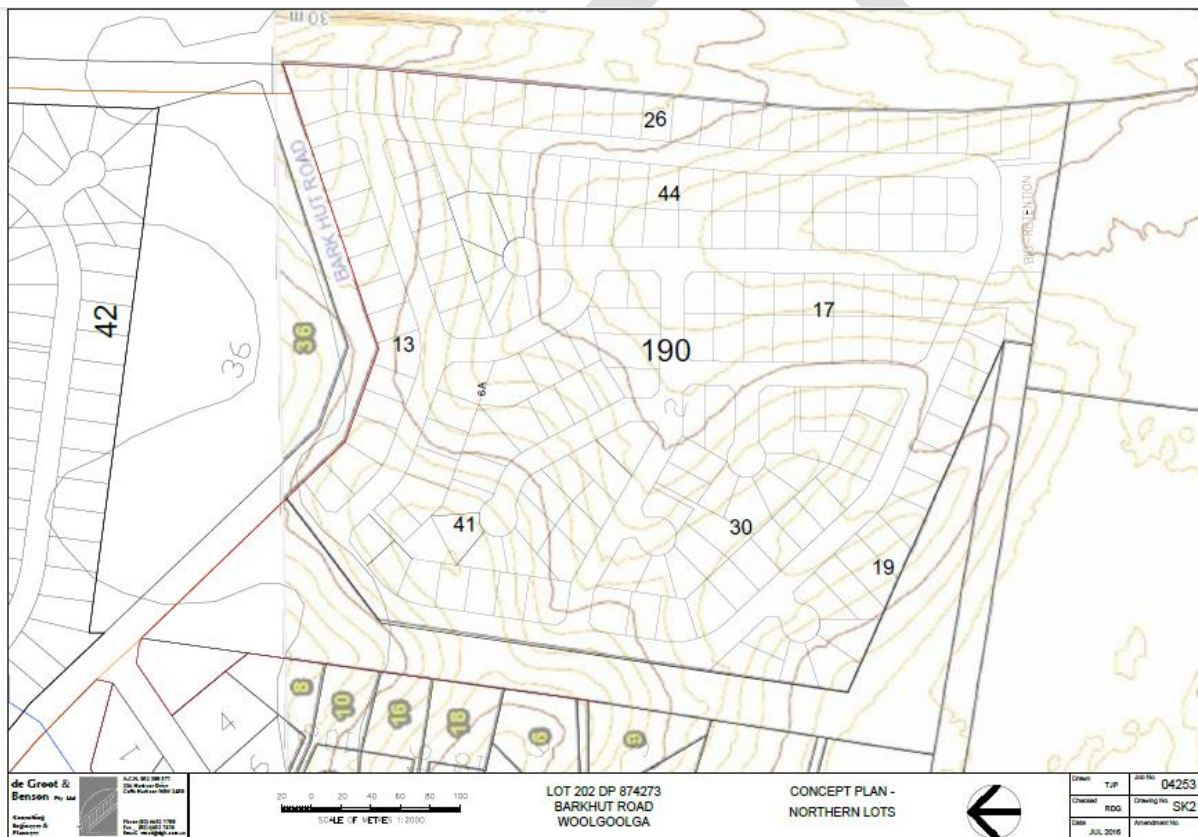


Figure 6: Lot Layout and contour map- Northern section.

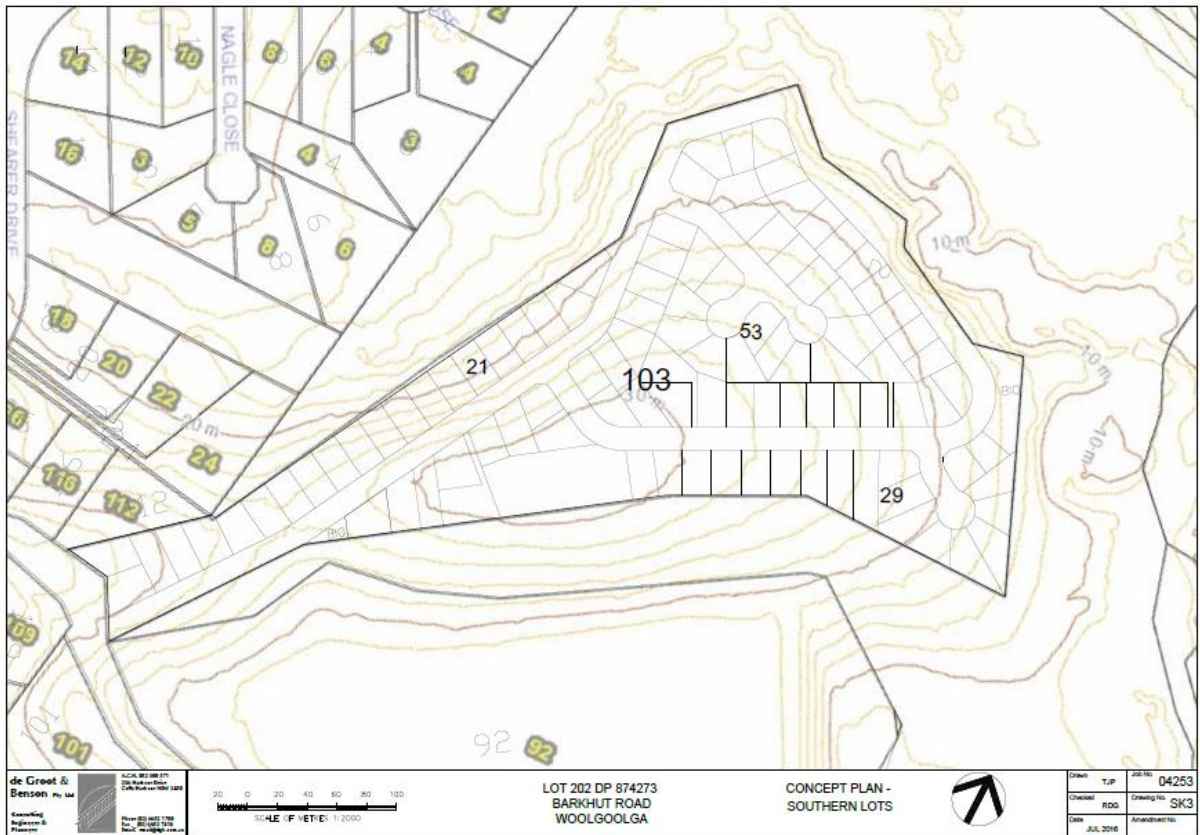


Figure 7: Lot Layout and contour map- Southern section.

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6. ARCHAEOLOGICAL SYNTHESIS AND PREDICTIONS

6.1 European History of the Coffs Harbour Area.

The first historical documents relating to the Woolgoolga area are the naming of the 'Solitary Islands' by James Cook in May 1770, with additionally mapping by Matthew Flinders in 1779. However, despite the early records from 1791 of the convicts William and Mary Bryan and their two children running away to the area, it was not until 1847 that the next record of the settlement exists, with Captain John Korff taking shelter at the southern Headland of the area that is now 'Coffs Harbour' (Thomas 2013). European settlement of the Coffs Harbour/ Woolgoolga area was relatively late compared to areas along the Bellinger and Clarence Rivers. This was largely due to the absence of a large river system:

There was at least some cedar getting at Coffs Creek by Walter Harvie and George Tucker in 1865, with the camp set up by Harvie and Tucker being one of the earliest known semi-permanent settlements in the Coffs Harbour area. Timber getters often employed the services of Aboriginal bushmen who had the knowledge and skills to rapidly identify Cedar trees (Thomas 2013:2).

The township of 'Woogoolga' was first gazetted in 1888, (subsequently changed to Woolgoolga in 1966) following initial settlement in the 1870's. Three major phases of settlement can be defined within the Coffs Harbour area which have had cumulative impacts around Woolgoolga:

Forestry and forest related industries: This phase of settlement includes the very early extraction of cedar and later more broad extraction of remaining eucalypt species. This later process of clearing has historic linkages to the settlement of the area post World War 1 and the clearing of land by returned soldiers for early agriculture and horticulture. It is reasonable to assume that the Project Area was initially cleared for its timber resources.

Horticulture and agriculture: Farming has played an important role in the study area and has had the most significant impact on the physical landscape. Large areas of land have been cleared and regrowth managed for grazing and horticulture. Significant early crops include bananas, sugar cane and pineapples. Some agricultural diversification has taken place, and contemporary land use includes the cultivation of Blueberries and nuts (Macadamias particularly) and the establishment of aquaculture. A number of market gardens have operated within the area and are consistent with the historical process of dividing agricultural land into smaller lots as the district population increased. This type of land use has had the most significant historical effect on the Project Area.

Residential development: This process of urbanisation has increased significantly since the 1980's. This process is most noticeable with the development of residential areas around small coastal settlements such as Sandy



Beach and Safety Beach. This urbanisation has mostly been contained within areas already cleared as a result of forestry and horticulture, and has significantly changed water courses and drainage. No evidence of residential development was observed on the Project Area.

6.2 Aboriginal History

The study area is located within the Gumbayngirr Nation/Language Area which is broadly known to include the lands north of Nambucca Heads, south of the Clarence River and west up to the Great Dividing Range (Thomas 2013:1). The name Woolgoolga is understood to be derived from the word Wee- gullga or Weilgulga for a native plum or lilly pilly which was known to occur abundantly between the beach and lake (http://www.gnb.nsw.gov.au/place_naming/placename_search/extract?id=SLplMKmMn). This reference supports the use of the area for exploitation of closed and rainforest resources.

Given the problematic nature of pre-European Aboriginal population estimates, the latter and more 'general' observations of Mathews (1898) for the broader Northern NSW coastline are more relevant:

In the well-watered coastal districts of New South Wales, where fish and game are abundant, their hunting grounds would be comparatively small (Mathews 1898:66).

Radcliffe Brown (in Lane 1970:V.8) concludes for the coastal areas that population densities would be in the order of 'one person to every three square miles'. Estimates of tribal groups in the order of 200 individuals are relatively common amongst ethno-historic and anthropological literature (i.e. see Lane (1970) for the Nambucca River district immediately south). An additional element to this discussion of population density is the differentiation between the coastal and the escarpment areas where it is generally accepted had lower and much more mobile Aboriginal populations. For the larger River systems (Nambucca, Clarence and Macleay) the concept of more intensive use of the coast as compared to the up-river and escarpment is generally accepted (i.e. McBryde 1974, Godwin 1990).

However, a unique aspect of the Coffs Harbour/ Woolgoolga area is the close proximity of the Great Dividing Range to the Coastline and the absence of a major river system. No other 'district' on the North Coast has such a narrow coastal zone, or such a short distance between the very different environments of coast and elevated/cold forests, and so many small creek or estuary systems which run directly into the Pacific Ocean. There is however great potential for pathways and routes between the coast and escarpment/hinterland however, these are not necessarily represented archaeologically through the discard of Aboriginal Objects or noted in early ethno-historical accounts.



Due largely to the absence of a large river system the Coffs Harbour district was settled by Europeans later than areas of the Clarence River to the north or Bellingen/ Kalang and Nambucca Rivers to the South. As such any observations from the relatively late settlement of the Woolgoolga area would also be biased as Gumbayngirr people generally would have had some 25 years of contact with European settlers by the time detailed records of Aboriginal life in the area were produced. It is expected that most of the local populations would have moved northward to Grafton around the time of settlement of Woolgoolga.

The relatively limited amount of ethno historical information available for Coffs Harbour has been collated for the Coffs Harbour by-pass project which is focussed on the edge of the Coffs Harbour escarpment and therefore an analogous environment to the Study Area (Connell Wagner 2004). The study suggests that a mode of occupation focussed around 'base camps' which provided a degree of protection from the elements surrounded by a series of smaller 'resource-specific' sites in between. The study places populations (in terms of size of group per camp) at 50 with groups as large as 200 recorded at Sawtell/ Bonville Creek. The study (Connell Wagner 2004:6) also makes specific reference to the sub-coastal area- indicating that permanent occupation of these areas was rare- with use being typically during travel to another location.

Historic camps in the Coffs Harbour area tended to be on Public land and nearby to small townships where there was access to water either naturally occurring or at a public tap. The main camping areas identified by Goulding (2001:64,65) are at Corindi Lake, inland from Arrawarra, Nana Glen (junction of Orara River and Bucca Bucca Creek), Happy Valley in Coffs Harbour, Coffs Creek/Fitzroy Oval, Wongala Estate and Yellow Rock. Generally speaking the historical experiences of Aboriginal people has been one of exclusion up until the 1960's (i.e Calley 1956:201). The nature of historic Aboriginal camps and economy within the historic period is such that it is unlikely these types of 'sites' will be present in the historic record of the study area.

6.3 Archaeological and Cultural Heritage Assessments

6.3.1 *Hearnes Lake.*

Hearnes Lake is a small creek and estuary system located immediately south of Woolgoolga Creek and provides a useful analogy for the Project Area. An archaeological assessment of the Hearnes Lake Caravan Park was undertaken in 1983 (Lilley 1983). No sites were recorded during the survey in the caravan park however, an isolated artefact and midden scatter was recorded immediately north of Hearnes Lake Road. The middens were described as 'dinner time camps' and contained Triton Spp. which are associated with rocky coastlines.

Dallas (2008) undertook an archaeological assessment for a proposed residential development to the south of Hearnes Lake which identified a number of sites directly associated to Hearnes Lake and Double Crossing Creek. Site types included artefact scatters and isolated artefacts. These artefacts were typically derived from locally



available cobbles or pebbles and included several manuports. The sites were located on the alluvial plain in close proximity to estuarine and swamp environments

An archaeological survey was undertaken for the Development Control Plan for Hearnese Lake residential area immediately south of the Woolgoolga industrial area (Collins 2004). This study identified a number of Aboriginal sites and PADs including site HL-1 (22-1-0234) which is described as an Artefact Scatter consisting of flakes and cores produced from locally available Greywackes as well as introduced Cherts and indurated Mudstones. A total of 13 stone artefacts were recorded (Collins 2004:20). The DCP survey also identified 19 stone artefacts within Lot 21 DP 714858 (#22-1-0359-Hearnese RD Lot 21 Ridge Site) which is immediately adjacent to the coastline/ Hearnese Lake entrance.

Two archaeological assessments were undertaken for the 'Woopi Beach Estate' residential development which comprised the area of the Hearnese Lake 1 site (Hill et al 2015a, 2015b). These studies confirmed the extent of the Hearnese Lake 1 site as being the ridge crest as originally mapped by Collins (2004). Artefacts identified at Hearnese Lake 1 included a large number of small flakes produced from mudstones and siltstones; quartz and silcrete however the assemblage predominately comprised simple greywacke flakes, cores and flake pieces. A double edge ground greywacke axe and an isolate flake to the east of the study area (Hearnese Lake 5) were also identified by this study (Hill 2015a). A major finding of the study was the presence of artefacts in areas which had been cleared and grazed and the absence of artefacts in areas which had been excavated.

6.3.2 *Coffs Harbour- Urunga Forestry Management Areas (Davies and Stewart Zerba 1995).*

The Coffs Harbour- Urunga Forestry Management study provides the most comprehensive regional assessment of the archaeological values and potential of the Coffs Coast hinterland. Whilst it is acknowledged that the sub-coastal zone which comprises the Project Area is not included within the Davies study some of its findings have practical application as the study was structured around 'landsystems' (Davies and Stewart Zerba 2005). Overall the sampling strategy employed by the study was biased towards the location of open campsites, stone artefact scatters and isolated finds. However the study found a strong correlation between archaeological sites; the degree of slope and the sandiness of soils and concluded that the majority of archaeological sites occurred on the crests of spurs in areas which would have been dry sclerophyll or open forest. Regionally the majority of archaeological sites in the study area were associated with the dissected escarpment and ranges with relatively few sites found on near coastal low hills and rises. However, the study found that whilst 'site density' was greater in the escarpment area the number of artefacts per site was much lower when compared to coastal and sub-coastal sites. This finding supports a model of greater mobility through the escarpment and a relative absence of permanent camps when compared resource rich marine and estuarine areas of the coastline.



6.3.3 *Sapphire to Woolgoolga Pacific Highway Upgrade (Collins 2007)*

The upgrade of the Pacific Highway between Sapphire and Woolgoolga resulted in the construction of a new highway bypass less than 1km west of the Project Area. The archaeological assessment for this major project was undertaken by Collins (2007) and identified a total of 7 archaeological sites and 8 PADs. Three of these sites (S2W-5, S2W-6 and S2W-7) are in close proximity to the Project Area (refer section 5.1 above) and are located on a single south facing ridge-crest which forms part of the Woolgoolga Creek catchment area. Two PADs (PAD 2 and 3) were also recorded during this study.

Two of the sites (S2W 5 and S2W-6) were recorded as isolated artefacts whilst the S2W-7 site was recorded as a much larger stone artefact scatter with at least 200 artefacts. The artefact assemblage in S2W-7 is diverse and includes (as examples) simple greywacke flakes, retouched mudstone flakes; chert flakes, chert cores and a grindstone. As such it is reasonable to conclude that the ridge crest was used as a campsite and knapping area. The average density of S2W-7 was estimated to be 2.2 artefact per m² (Collins 2007:40-44).

6.3.4 *Woolgoolga Modular Housing Estate (Hill et al 2016)*

Everick Heritage Consultants undertook an Aboriginal Cultural Heritage Assessment of the Woolgoolga Modular Housing Estate ('MHE') located on McIntosh Crescent, to the south of Newmans Road, Woolgoolga. This survey resulted in the identification of 2 artefacts on a small tributary to Woolgoolga Creek and a redeposited hammer stone in a pile of introduced fill. The study concluded that the area was not utilised as a main campsite or stone tool production area. The study proposed that the main campsites, and therefore areas of high archaeological potential, are located along the Woolgoolga Estuary closer to the coast and on the surrounding ridge crests to the north of the Project Area. Consultation with Coffs Harbour and District Local Aboriginal Land Council indicated that the study area may have been a 'pathway' between Woogoolga Creek Estuary and the Coast Range, including 'Marys Waterhole' or have functioned as a peripheral area to the Woolgoolga fighting ground located to the east (near the Fire station).

6.4 Potential Site Types: Aboriginal Archaeological Sites in the Coffs Harbour Region

The most comprehensive 'regional' model for the area is provided by Godwin (1990) in a major review of the earlier archaeological research of Isabelle McBryde. Godwin's model specifically investigates patterns of movement between the coastal, sub-coastal and tablelands (escarpment) areas. However the applicability of this model to the Coffs Harbour area is problematic as the tablelands/escarpment intrude so far into the coastal zone.



For the purposes of understanding the archaeological record the study area is considered to fall into the 'coastal' area.

Amongst coastal groups proper there was no movement from the coast back into the sub-coastal river valleys and foothills. These people were semi-sedentary and lived close to the coast the whole year round. Movement associated with the subsistence round involved travelling only short distances away from the littoral. There were instances of long distance travel associated with ceremonial gatherings. However, such movement was generally parallel to the coast (i.e. north-south along the coast rather than east-west from coast to hinterland) (Godwin 1990:122,123).

Collins (2007:27-28) study of the Sapphire to Woolgoolga Highway upgrade proposed a model of archaeological sensitivity based on landform. This study identifies three broad land systems- being Coastal Alluvial Plains; Coastal Ramp and Escarpment Foothills. The Project Area is considered to fall within the Coastal Alluvial Plain of which the study (Collins 2007) proposes;

...those with highest archaeological sensitivity are well-drained swamp and estuary banks, and the level to low - gradient crests of low rises and spurs.

Elements of lowest archaeological sensitivity are valley flats, plains and open depressions. Irrespective of their landscape context, areas developed for residential uses or otherwise intensively disturbed (e.g. road and services easements) will also have low archaeological sensitivity. (Collins 2007:27)

For the purposes of this model the Project Area is considered to be a valley flat or plain on the grounds that the adjacent creek is not estuarine and there is no noticeable gradient typical of crests of spurs which occur further to the west and north.

Based on the review of previous archaeological and cultural heritage assessments in Woolgoolga and the broader region it is reasonable to propose that specific environment contexts including lowland hills, estuarine creek banks and coastal dunes are more likely to contain evidence of Aboriginal occupation. The review of previous studies indicates that archaeological sites are rarely found on alluvial flats not associated to estuarine environments. However, the following site types and potential types have been identified in the above contexts.

6.4.1 *Isolated Artefacts*

These sites consist of single stone artefacts, which may have been randomly discarded or lost. They can occur in almost any environmental context exploited by Aboriginal people. They are commonly stone axes, single cores, hammer stones, pebbles, flakes and grinding stones and/or grooves. Their presence may indicate that more



extensive scatters of stone artefacts exist or existed nearby, perhaps obscured by vegetation or dispersed by mechanical means.

There is a low potential for isolated artefacts to be located within the Project Area. Should these occur they are likely related to peripheral use of larger campsites along ridge crests to the west and the Woolgoolga Creek estuary to the south.

6.4.2 *Open Campsites/Artefact Scatters*

Open campsites/artefact scatters generally consist of scatters of stone artefacts and possibly bone and hearth features. Their exposure to the elements means that evidence of food resources used on the site (with the exception of shellfish) is usually lacking. An open campsite containing a large component of shell refuse may be described as a midden. They invariably consist of low or high density scatters of primary and secondary flakes in addition to the types of artefacts found as isolated finds. Open campsites may also contain burials when located on sand strata. Few open campsites are found on kraznozem and podzolic soils, possibly due to the destructive impacts of land clearing and the heavy vegetation cover. Detection is usually unlikely unless a high degrees of surface visibility is present.

There is a low potential for artefacts scatters to be located within the Project Area. It is likely that larger open campsites will be located on ridgecrests to the west of the Project Area and to the east along the Woolgoolga Creek estuary.

6.4.3 *Quarry Sites*

A stone quarry may occur where a source of opaline silica exists or other siliceous types of stone occur (e.g. chert, chalcedony and silcrete). The area can be identified by a number of different types of stone tools in various stages of production as well as refuse flakes.

Given that lack of visible suitable bedded rock outcrops or known sources of siliceous material, it is reasonable to expect that no quarry sites will be located within the Project Area.

6.4.4 *Scarred Trees*

Scarred trees result from the removal of bark for use as covering, shields, containers or canoes. No doubt, as an outcome of widespread intensive land clearing and natural causes very few have survived.

As the Project Area has been completely cleared of trees, it is reasonable to assume that no scarred trees will be located. Scarred trees may exist within the riparian zone however would not be affected by the rezoning proposal.



6.4.5 *Burials*

Human burials are typically individual or small group internments which can be found in sandy soil substrates, such as creek lines or within small rock crevices. Most of the known burials have been located by accidental means through mechanical disturbance or natural erosion.

Given that the underlying soil is not sandy, there is a low potential to locate burials within the Project Area.

6.4.6 *Ceremonial Sites*

Ceremonial grounds are typically places identified by Aboriginal groups as places of importance which were visited by groups to mark or commemorate rites or other occasions. One such example is Bora grounds; earthen mounds crafted in a circular formation which were used for the purposes of ceremonial practices.

No ceremonial sites are known to occur on within the Project Area.

6.4.7 *Mythological Sites*

These sites are natural features, which derive their significance from an association with stories of the creation and mythological heroes.

No mythological sites are known to occur within the Project Area.



7. FIELD SURVEY: ABORIGINAL CULTURAL HERITAGE

7.1 Survey Team

A pedestrian survey for cultural heritage of the Project Area was undertaken by Everick Senior Archaeologist Tim Hill and CHDLALC Senior Aboriginal Sites Officer Ian Brown on 20 September 2017.

7.2 Assessment Methods

The field methods aimed to inspect exposed ground surfaces as conditions would allow, to record any archaeological material found and undertake a preliminary assessment of its significance. The potential of the Development Area to contain sub-surface deposits (PADs) was also assessed through observation of soil profiles along Woolgoolga Creek and in any disturbed areas.

Photographs were taken as a record of general features and to document past disturbance. Notes were made of the degree of disturbance and the archaeological potential. A Garmin GPS (GDA 94 datum) was used to record the extent of survey coverage. Mapping and plans used in this assessment were provided by Connectability Pty Ltd and represent the level of information provided to the consultant.

In addition to assessing the cultural heritage potential of the Project Area, the survey aimed to confirm the interpretation of the nature and degree of ground disturbance observed in and satellite imagery (Figure 2 and Figure 3).

For ease of ground coverage and for purposes of description the Project Area is treated as a single unit due to the uniformity of conditions. There are no mature trees within the Development Area and as such these were not directly targeted by the survey.

7.3 Constraints to Site Detection

An assessment of the constraints to site detection is made to assist in formulating a view as to the effectiveness of the field inspection to find Aboriginal sites and cultural heritage materials. It also assists in the forming of a view of the likelihood of concealed sites (PADs), keeping in mind a site specific knowledge of the disturbance impacts that European land uses and natural processes may have had on the 'survivability' of Aboriginal sites in a Development Area.



The constraints to site detection are almost always most influenced by post European settlement land uses and seldom by natural erosion processes. The area of surface exposure and the degree of surface visibility within exposed surfaces are usually the product of 'recent' land uses e.g. land clearing, ploughing, road construction, natural erosion and accelerated (manmade) erosion (McDonald et .al. 1990:92).

In this case the major 'manmade' constraints to Aboriginal site survivability and detection are due to the clearing of original forest and the subsequent impacts of grazing which through, what is called taphonomic processes, can have the effect of accelerating movement of artefacts such as stone downward through soft soils. Detection of Aboriginal archaeological sites in the Project Area is severely limited by the presence of improved pastures. Vegetation has been cleared in the past. Some evidence of mass movement and erosion of soils was noted throughout the Project Area in the form of a large swale which has likely been constructed from material excavated from the Sports Field. Based on the observations taken during the survey it reasonable to conclude that it is unlikely that any soils in the upper 300mm contain original surfaces (Figure 8, Figure 9 and Figure 10).

Table 2: Summary of Environment and Ground Disturbance for Survey Unit.

<i>Survey Unit</i>	<i>Environmental Description</i>	<i>Ground Disturbance Summary</i>
Ridge crests	Open pastured grassland with some sparse native and introduced (pine) trees. Vehicle tracks occur along the spine of most ridge crests.	Land clearing.
Slopes	Open pastured grassland with some sparse native and introduced (pine) trees.	Land clearing.

7.4 Survey Coverage

To achieve as thorough and effective an archaeological assessment as possible a pedestrian ground survey of a sample of the Project Area was undertaken. The following summarises the broad conditions for the survey of each identified unit within the Project Area:

- a) Ridge crests. Cleared open grassland with some regrowth of native trees and introduced pines. The understory was typically dense comprising bladey grass and weeds.
- b) Slopes. Cleared grassland with large patches of regrowth forest including native trees and introduced pines. The understory was typically dense comprising bladey grass and weeds.

Table 3 and Table 4 present information on the extent to which survey data provides sufficient evidence for an evaluation of the distribution of archaeological materials across the Project Area. The evaluation of survey



coverage provides a measure of the potential for the survey to identify archaeological evidence. The calculations in Table 4 and Table 3 do not provide an exact percentages, but reasonable estimates.

Table 3: Survey Coverage.

Survey Unit	Landform	Survey Area (m ²)	Visibility (%)	Exposure (%)	Effective Coverage Area (m ²)	Effective Coverage (%)	Sites Found
PAD 1 (North ridge)	Ridgecrest	200	20	30	12	6	2
PAD 2 (Middle Ridge)	Ridgecrest	375	20	30	22.5	6	0
PAD 3 (South Ridge)	Ridgecrest	150	5	5	.375	0.25	0

Table 4: Landform summary- sampled areas

Landform	Landform Area (m ²)	Area Effectively surveyed (m ²)	% of Landform effectively surveyed	Number of sites	Number of artefacts
PAD 1 (North ridge)	4119	12	0.29	2	2
PAD 2 (Middle Ridge)	5028	22.5	0.44	0	0
PAD 3 (South Ridge)	9742	.375	0.0038	0	0

The following should be considered when reviewing the effectiveness of the survey and the survey results:

- a) The target total survey area for pedestrian transects was 5% of the Project Area which was not achieved by the survey primarily due to the significant amount of improved pasture and weeds over the Project Area at the time of the survey.
- b) The overall low predicted likelihood of identifying sites within the Project Area.
- c) The potential that stone artefacts have moved downward through the soil profile as a result of clearing, trampling and topsoil disturbance.



Figure 8: Typical surface exposure along trail on ridge crest with regrowth trees on slope.



Figure 9: Trail along ridge with cleared crest and slopes.



Figure 10: Typical exposure on trail from western portion of Project Area.

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8. RESULTS

8.1 Results

As a result of the desktop study, field inspections, Aboriginal community consultation and archaeological investigation of the Project Area, the following was found.

- Two artefacts (Bark Hut Road IF 01 #22-1-0503 and Bark Hut Road IF 02 #22-1-0504) were observed on the access trail immediately south of the Bark Hut Road entrance to the Project Area (Figure 12). These consisted of stone flakes derived from Greywacke and Rhyolite, which are common in the Woolgoolga area. Given the location of the artefacts on an area of upper slope, it is likely that the artefacts are a secondary deposit from the main campsite, which is identified in the Council Reserve to the immediate west of the access road. This area will not be part of the rezoning application and as such this ridge crest was not surveyed.
- Having consideration for the landscape context of the Project Area and the history of disturbance it is considered unlikely that the Project Area will contain Aboriginal sites of high or moderate conservation value. The Project Area is unlikely to contain burials or middens and does not contain scarred or modified trees. Whilst some historic campsites are known in the general vicinity the Project Area none are known with the Project Area. No Mythological or ceremonial sites are known to occur within the Project Area, however it is noted that the ridge-crest may have been utilised as a pathway between the coast and hinterland.
- There is very little topsoil material in the upper slope and the artefacts were identified on the compacted surface of the trail. It is considered unlikely that the surrounding soils would contain Aboriginal objects. However, having consideration for the Due Diligence Code of Practice requirements the entire ridge crest is considered to a Potential Archaeological Deposit (PAD). This includes a small ridge crest in the north-east corner of the Project Area.
- A second PAD was identified in the southern portion of the Project Area comprising a knoll to the west of the water storage dam however no Aboriginal objects were identified on the knoll. However, the presence of topsoil on the knoll provides an indication that there is the potential for an Aboriginal stone artefact scatter to occur on the knoll.



Table 5: Summary of survey results

<i>Site Name</i>	<i>Feature</i>	<i>Easting (GDA94)</i>	<i>Northing (GDA 94)</i>	<i>Survey Unit</i>	<i>Landform</i>
<i>Bark Hut Road IF 01 (#22-1-0503)</i>	Stone artefact	517672	6670314	2	Upper Slope.
<i>Bark Hut Road IF 02 (#22-1-0504)</i>	Stone artefact	517742	6670394	2	Upper Slope.

No items or relics of European heritage were identified during the assessment.

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Figure 11: Bark Hut Road Isolated Find locations



Figure 12: Site and PAD locations northern section.



Figure 13: PAD location southern section.



Figure 14: Location of Bark Hut Road Isolated Find 01 on access trail.



Figure 15: Detail of Bark Hut Road Isolated Find 1.



Figure 16: Location of Bark Hut Road Isolated Find 02 on access trail.



Figure 17: Detail Bark Hut Road Isolated Find 2 core.



8.2 Significance Assessment

The artefacts identified by the study are determined to have low scientific value. The basis for this assessment is primarily the low degree of confidence that the artefacts are insitu, and that the artefacts are similar to stone artefacts from other assemblages in the Woolgoolga area. It is likely that the artefacts have been moved down slope from the adjacent ridge crest.

Based consultation with Aboriginal Sites Officers present during the assessment the Bark Hut Road sites are considered to be of social or cultural significance.

The aesthetic significance of the sites is considered to be low given the extent of surrounding land clearing.

8.3 Impact Assessment

The following table is provided to summarise the impacts that might arise from the Project (Table 6).

Table 6: Bark Hut Road impact assessment summary.

<i>Site Name</i>	<i>Type of Harm</i>	<i>Degree of Harm</i>	<i>Consequence of Harm</i>
<i>Bark Hut Road IF 01</i>	Direct	Total	Total loss of value
<i>Bark Hut Road IF 02</i>	Direct	Total	Total loss of value

8.4 Management and Mitigation Measures

The following management and mitigation options have been considered for the Bark Hut Road IF 01 and Bark Hut Road IF 02 sites:

- a) complete avoidance;
- b) harm with salvage and repatriation on-site; and
- c) harm without salvage.

It is concluded that 'harm with salvage and repatriation onsite' is the most appropriate management response for Bark Hut Road IF 01 and Bark Hut Road IF 02 sites.

The options for the salvage any Aboriginal objects which may occur within the Project Area include;



- retrieval of artefacts via a mechanical sieving program and reburial within the Project Area;
- relocation of the topsoil into designated reserve/ landscape areas; and
- relocation of topsoil to an appropriate location away from the Project Area.

8.5 Ecologically Sustainable Design Principles

It is reasonable to conclude that the Development Area has a low potential to contain Aboriginal objects and that the Bark Hut Road Isolated Finds 01 and 02 are disturbed. It is likely that the main areas of occupation, and therefore potential to contain Aboriginal objects, are located on the ridge crest to the west of Bark Hut Road IF 02.

The Bark Hut Road Isolated Finds 01 and 02 sites will not significantly add to the current knowledge of coastal archaeology due to the nature of disturbance across the site and overall low artefact densities. Further the artefacts are not considered sufficiently unique to add to collections of artefacts held by the CHDLALC for future educational use or display.

The potential cumulative impact of the harm has been assessed as low on the basis that the Bark Hut Road Isolated Finds 01 and 02 sites have already disturbed.

8.6 Additional Research

It is not considered that additional archaeological research, in the form of test pit excavations, will significantly inform the management response for sites within the Project Area. This conclusion is based on the following considerations;

- the absence of large scale stone artefact scatters identified during the archaeological survey;
- the absence of known ceremonial or intangible sites in the Project Area and surrounds;
- the nature and extent of known archaeological sites in the surrounding areas; and
- The absence of deep and undisturbed topsoil deposits.

It is considered unlikely that an archaeological excavation program over the PAD areas will identify a stone artefact scatter with either high or moderate conservation value. Stone artefact scatters, should they occur, are likely to be disturbed, have low artefact densities and are unlikely to contain locally unique artefacts. As such it is reasonable to conclude that these sites, should they exist, will be of low



conservation value. As with the known Isolated Finds, salvage with repatriation on site is considered to be an appropriate management response for archaeological sites on PAD areas.



9. CONCLUSIONS AND RECOMMENDATIONS

On the basis of the results and discussed above, the following management recommendations are provided:

Recommendation 1: Cultural Heritage Induction

It is recommended that a cultural heritage induction is provided by representatives of the RAPs for all senior civil works staff involved in the initial removal of topsoil from the ridge crests identified by the ACHAR. This induction should provide;

- an overview of the nature and extent of archaeological materials within the Project Area;
- the broader cultural context of the site and its significance to Aboriginal people;
- an outline of relevant legislation; and
- an outline of the AHIP salvage procedure and an outline of an appropriate Finds Procedure.

Recommendation 2: Application for an Aboriginal Heritage Impact Permit (AHIP)

It is recommended that prior to commencement of works (issue of Construction Certificate) that the proponent apply for an Aboriginal Heritage Impact Permit (AHIP) for salvage of known Aboriginal Objects from within the Project Area (Bark Hut Road IF 01 #22-1-0503 and Bark Hut Road IF 02 #22-1-0504). This AHIP should be subject to the following conditions relating to the salvage program:

- Cultural heritage induction for all ground clearance contractors.
- Collection of surface artefacts by Raps and temporary storage at CHDLALC.
- Monitoring of topsoil removal and collection of artefacts from the ridge crest and temporary storage at CHDLALC.
- The monitoring should be in an area 20m below the access track and along the apex of the ridge to the upper/ mid slope. All the way down to Creek.
- Permanent burial of artefacts within a reserve or garden area nearby.
- The monitoring should also include the ridge area in the north-east of the Lot.

Recommendation 3: Southern PAD

It is noted that the site inspection did not identify any Aboriginal objects within the southern PAD area, defined by the knoll to the west of the water storage dam. Having consideration for the potential of this PAD to contain Aboriginal sites of high or moderate conservation value it is recommended that the minimum management response for this PAD is a cultural heritage induction and the application of an Aboriginal Find Procedure.



If it is suspected that Aboriginal material has been uncovered as a result of development activities within the Project Area:

- a) work in the surrounding area is to stop immediately;
- b) a temporary fence is to be erected around the site, with a buffer zone of at least 10 metres around the known edge of the site;
- c) an appropriately qualified archaeological consultant is to be engaged to identify the material; and
- d) if the material is found to be of Aboriginal origin, the Aboriginal community is to be consulted in a manner as outlined in the *ACHCRP Guidelines (2010)*.

Should the material be identified as an Aboriginal object and the proposed works cannot be amended to avoid the Aboriginal site an Aboriginal Heritage Impact Permit (AHIP) would be required prior to recommencement of works in the vicinity of the site. Consultation with stakeholders from the Aboriginal community would be required as a part of the AHIP application process.

It is recommended that these requirements are formalised within a Cultural Heritage Management Plan agreed to by Registered Aboriginal Parties prior to issue for the Development Application for subdivision to allow an opportunity for RAPs to better consider the full impacts of proposed works.

Recommendation 4: Aboriginal Human Remains

Although it is unlikely that Human Remains will be located at any stage during earthworks within the Project Area, should this event arise it is recommended that all works must halt in the immediate area to prevent any further impacts to the remains. The Site should be cordoned off and the remains themselves should be left untouched. The nearest police station (Coffs Harbour), the Coffs Harbour Local Aboriginal Land Council and the OEH Regional Office (Coffs Harbour) are all to be notified as soon as possible. If the remains are found to be of Aboriginal origin and the police do not wish to investigate the Site for criminal activities, the Aboriginal community and the OEH should be consulted as to how the remains should be dealt with. Work may only resume after agreement is reached between all notified parties, provided it is in accordance with all parties' statutory obligations.

It is also recommended that in all dealings with Aboriginal human remains, the Proponent should use respectful language, bearing in mind that they are the remains of Aboriginal people rather than scientific specimens.



Recommendation 5: Conservation Principles

It is recommended that all effort must be taken to avoid any impacts on Aboriginal Cultural Heritage values at all stages during the development works. If impacts are unavoidable, mitigation measures should be negotiated between the Proponent, OEH and the Aboriginal community.



10. REFERENCES

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APPENDIX A: AHIMS SEARCH RESULTS



Office of
Environment
& Heritage

AHIMS Web Services (AWS) Extensive search - Site list report

Your Ref/PO Number : Bark Hut Road
Client Service ID : 261963

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
22-1-0152	C1_Poundyard Ck	AGD	56	517710	6669940	Open site	Valid	Aboriginal Resource and Gathering : -, Artefact : 3		102143,102419
	Contact									
	Recorders									
22-1-0408	West Woolgoolga Sports Field	GDA	56	517856	6669964	Open site	Valid	Artefact : 2		
	Contact									
	Recorders									
									Permits	3613

Report generated by AHIMS Web Service on 12/01/2017 for Kelley Hunter for the following area at Lot : 202, DP:DP874273 with a Buffer of 50 meters. Additional Info : map items. Number of Aboriginal sites and Aboriginal objects found is 2

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



APPENDIX B: CORRESPONDENCE TO POTENTIAL ABORIGINAL STAKEHOLDERS

02 November 2017

Our Ref: EV.600

Garby Elders
Deborah Dootson
21 Knox Street
WOOLGOOLGA NSW 2456

Dear Deborah,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

We wish to advise that we have been engaged to undertake an Aboriginal Cultural Heritage Assessment for the above mentioned study area. The land subject to assessment is situated at Bark Hut Road, Woolgoolga, NSW. The assessment will be conducted for the proposed rezoning of Lot 202 DP874273, Woolgoolga, NSW, (west of Solitary Islands Way)(see enclosed plan).

We are seeking to consult with all Aboriginal persons and organisations that may have knowledge about the history of the Project Area. Consultation will be consistent with the *Office of Environmental Heritage Aboriginal Cultural Heritage Consultation Requirements for Proponents (2010)*. If you are interested, or know of persons who may be interested, we request that you contact us by **20 November 2017** to register your interest. Please write to:

Tim Hill
Senior Archaeologist
Everick Heritage Consultants
PO Box 200
Coffs Harbour NSW 2450 /or
t.hill@everick.com.au

If you have any questions about the Project, please contact Tim Hill on 0422 309 822. If you wish to find out more about our qualifications and experience in this field, please visit our website www.everick.com.au. We look forward to hearing from you.

Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Coffs Harbour and District Local Aboriginal Land Council
Greg Douglas
PO Box 6150
COFFS HARBOUR NSW 2450

Dear Greg,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

We wish to advise that we have been engaged to undertake an Aboriginal Cultural Heritage Assessment for the above mentioned study area. The land subject to assessment is situated at Bark Hut Road, Woolgoolga, NSW. The assessment will be conducted for the proposed rezoning of Lot 202 DP874273, Woolgoolga, NSW, (west of Solitary Islands Way)(see enclosed plan).

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Garlambirla Guuyu-girrwa Aboriginal Corporation
The Chairperson
PO Box 6904
PARK BEACH NSW 2450

To the nominated Chairperson,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Mudjay Elders
Cultural Heritage Officer
11 Anderton Street
COFFS HARBOUR NSW 2450

To the nominated Cultural Heritage Officer,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Bagawa Birra Murri Aboriginal Corporation
Susan Hoskins
31 Soren Larson Crescent
BOAMBEE EAST NSW 2452

Dear Susan,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

We wish to advise that we have been engaged to undertake an Aboriginal Cultural Heritage Assessment for the above mentioned study area. The land subject to assessment is situated at Bark Hut Road, Woolgoolga, NSW. The assessment will be conducted for the proposed rezoning of Lot 202 DP874273, Woolgoolga, NSW, (west of Solitary Islands Way)(see enclosed plan).

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Gurehlgam Corporation Ltd T/A Yarrawarra
Kenn Payne
PO Box 1676
GRAFTON NSW 2460

Dear Kenn,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Mimi Mothers Aboriginal Corporation
Marcia Hillery
90 High Street
BOWRAVILLE NSW 2449

Dear Marcia,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Murrumbidgee Aboriginal Language and Cultural Co-operative Ltd
Gary Williams
14 Belwood Road
Via NAMBUCCA HEADS NSW 2448

Dear Gary,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

We wish to advise that we have been engaged to undertake an Aboriginal Cultural Heritage Assessment for the above mentioned study area. The land subject to assessment is situated at Bark Hut Road, Woolgoolga, NSW. The assessment will be conducted for the proposed rezoning of Lot 202 DP874273, Woolgoolga, NSW, (west of Solitary Islands Way)(see enclosed plan).

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Cultural Heritage Officer
Gumbaynggirr Native Title Group
14 Belwood Road
NAMBUCCA HEADS NSW 2448

To the nominated Cultural Heritage Officer,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Cultural Heritage Officer
Gumbayngirr Elders
PO Box 400
NAMBUCCA HEADS NSW2448

To the nominated Cultural Heritage Officer,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Noel Campbell
Ngurrala Aboriginal Corporation
PO Box 62
MACKSVILLE NSW 2447

Dear Noel,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

DFTV Enterprises
5 Mountbatten Close
RUTHERFORD NSW 2320

Dear Derrick,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Aaron Talbott & Natalene Mercy
6 Bando Street
GUNNEDAH NSW 2380

Dear Aaron & Natalene,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Jagun Elders
Tony Perkins
PO Box 649
WOOLGOOLGA NSW 2456

Dear Tony,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

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Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



02 November 2017

Our Ref: EV.600

Norm Archibald
17 Flobern Ave
WAUCHOPE NSW 2446

Dear Norm,

**RE: ABORIGINAL CULTURAL HERITAGE ASSESSMENT/ABORIGINAL HERITAGE IMPACT PERMIT
LOT 202 DP874273, WOOLGOOLGA, NSW**

We wish to advise that we have been engaged to undertake an Aboriginal Cultural Heritage Assessment for the above mentioned study area. The land subject to assessment is situated at Bark Hut Road, Woolgoolga, NSW. The assessment will be conducted for the proposed rezoning of Lot 202 DP874273, Woolgoolga, NSW, (west of Solitary Islands Way)(see enclosed plan).

We are seeking to consult with all Aboriginal persons and organisations that may have knowledge about the history of the Project Area. Consultation will be consistent with the *Office of Environmental Heritage Aboriginal Cultural Heritage Consultation Requirements for Proponents (2010)*. If you are interested, or know of persons who may be interested, we request that you contact us by **20 November 2017** to register your interest. Please write to:

Tim Hill
Senior Archaeologist
Everick Heritage Consultants
PO Box 200
Coffs Harbour NSW 2450 /or
t.hill@everick.com.au

If you have any questions about the Project, please contact Tim Hill on 0422 309 822. If you wish to find out more about our qualifications and experience in this field, please visit our website www.everick.com.au. We look forward to hearing from you.

Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants



APPENDIX C: REGISTRATION FROM ABORIGINAL STAKEHOLDERS

From: Culture [mailto:Culture@coffsharbourlalc.com.au]

Sent: Thursday, 9 November 2017 1:07 PM

To: Tim Hill <t.hill@everick.net.au>

Subject: Bark Hut Road Woolgoolga

Hi Tim,

To keep it official I am registering our interest in this project ok – thank you,

Yours in Unity

Michelle Flanders

Project Officer Culture & Heritage

CH&D LALC

2-3 Wongala Drive, Wongala Estate

PO Box 6150

Coffs Harbour NSW 2450

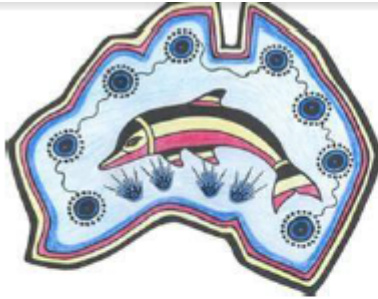
Ph: 02 6652 8740

Fax: 02 6652 5923

culture@coffsharbourlalc.com.au

PLEASE NOTE: I ONLY WORK ON THURSDAYS & FRIDAYS. If your enquiry requires urgent attention please contact the office on 02 6652 8740 for further assistance.

My office is located on Gumbaynggirr land & I pay my respect to our Elders past & present



Jagun Aged & Community Care

ABN: 73 116 306 346

Phone: 0417 806 239

PO Box 649 Woolgoolga NSW 2456

Everick Heritage Consultants Pty Ltd

P.O. Box 200

Coffs Harbour NSW 2450

Attention: Tim Hill

Jagun Aged and Community Care hereby register an Interest in Aboriginal Cultural Heritage Assessment rezoning land from RU2 (Rural landscape) to R2 (low density residential) Woolgoolga DP874273.

Jagun will be represented by Anthony Perkins Gumbaynggirr Elder/ Cultural Knowledge Holder, who has vast knowledge of the area.

Contact details for Anthony Perkins: mobile 0417 049 962, email simone@jagunagedcare.com.au and postal address PO Box 649 Woolgoolga NSW 2456.

Kind regards

Simone Perkins

Program Manager

21/10/2017



APPENDIX D: CONSULTATION NOTES 18 JANUARY 2018

From: Tim Hill [<mailto:t.hill@everick.net.au>]
Sent: Friday, 19 January 2018 4:12 PM
To: Culture; Simone Perkins; Deb Dootson
Cc: Ian Brown; tony dootson; Keiley Hunter
Subject: Bark Hut Road AHIP consultation/ site inspection

Hi Tony, Michelle and Deb (Ian and Tony)

Please see below my notes from the AHIP consultation meeting at Bark Hat Road Woolgoolga yesterday (18th January 2018). The meeting was attended by Uncle Tony Perkins (Jagun Elders), Ian Brown and Luana Ferguson (CHDLALC). Uncle Milton Duroux and Tony Dootson were apologies for the meeting.

BARK HUT ROAD ISOLATED FINDS 1 & 2

- Tim Provided a background to the proposed subdivision rezoning, indicating that the rezoning would provide for lots with a Lot size of between 500-600m². The boundaries of the area are the fenceline (to immediate west of meeting) and the Solitary Island Way and a section of and to the other side of Woopi Creek.
- Noted that the initial site inspection included Ian Brown from CHDLALC and 2 flakes were recorded on the access trail (location of meeting). The flakes were rhyolite and greywacke, they were typical of flakes from the coastal area.
- Ian Indicated that there was an outcrop of Rhyolite underneath Corindi village. Discussed the qualities of rhyolite for knapping- particularly that you needed to heat the rock to get through the cortex before knapping.
- Tim Discussed the landscape context of the site and noted that the topsoil layer was very thin and disturbed. Discussed what might have been the practice of clearing- that was likely in the 1960's or 70s.
- Mika Indicated that he bought the block in 1988 and have mostly just had it slashed since then.
- Ian Indicated that there was a walking trail through Woopi Creek down to the lake at Woolgoolga- that the lake was a teaching site.
- Tony Indicated that an old lady had a camp in the 1950's up near the Country Club Estate and that Michael McDougall had a camp across Bark Hut Road in an old packing shed.
- Noted that the old 'battle ground' was down on the creek where the Council depot is on the other side of the old highway. Described the last known use of this place and that the young man was buried in Woolgoolga Creek under a log.
- Tim Noted that two artefacts had previously been recorded in the area of the sportsfield proposal.
- Ina Thought that there were more than 2 artefacts.
- Tony Noted the problem that Council brought a lot of fill into the sportsfield area and he wasn't sure where it came from.

General discussion of management of the artefacts.

Ian Noted that he had problems with test pits in areas like this where there isn't a big site. Referred back to the excavations at Hearne's Lake ACHA study and noted they found a lot more during the ground works than they expected from the excavation results.

Tim Indicated that if the site was a large stone artefact scatter it would be visible on the ground and track. The absence of artefacts probably means it is only a low density stone artefact scatter or a small knapping area. Noted that it was unlikely to contain midden, scarred trees, unlikely to contain burials and there is no known mythological or historic sites. The main story is the connection through to St Mary's waterhole but that pathway isn't clearly understood to come through this block.

Ian Discussed the location of burials in the area and some traditional practices of burial.

General discussion of the ridge to the south of the site.



- Tony Indicated it was likely the connection to the coast was from the north-east through to Arrawarra headland and Mullaway
- Ian Noted the 'cut' along Bark Hut Road and that only some of the ridge is left intact.
- Tony Indicated that women used to carry white clay along all the ridges up to the waterhole- probably up until the 1940's. The young girls went up into the mountains before they had babies.
- Ian Suggested that test pits in this area probably wouldn't show up anything.
- Discussion of management for the site
- Cultural heritage induction for all ground clearance contractors.
 - Collection of surface artefacts by Raps and temporary storage at CHDLALC.
 - Monitoring of topsoil removal and collection of artefacts and temporary storage at CHDLALC.
 - Permanent burial of artefacts within a reserve or garden area nearby.
 - The monitoring should be in an area 20m below the access track and along the apex of the ridge to the upper/ mid slope. All the way down to Creek.
 - The monitoring should include the ridge area in the north-east of the Lot.\
 - Noted that the AHIMS site #IDs should be combined from two isolated finds to 1 single site.

DISCUSSION OF SOUTHERN PAD

- Tim Identified the obvious knoll- hilltop and noted that this had been identified as a PAD during the initial site inspection.
- Tony Questioned is the block was cleared in the 1960's when they built the water dam- would have been 66 or 65- that was the town water supply then.
- Ian indicated that the trees might be 30 or 40 years ld.
- Tim Questioned if test pits would be required prior to rezoning or Development consent.
- Tony Questioned if the trees would be retained or removed for the development.
- Mika Indicated the ecologist report did not specify to retain the trees.
- General discussion of a test pit program around the knoll. Conclusion that the program would be 1-2 days depending on if anything was located.
- Ian Noted that a minimum they would need to have an induction and a 'Find Procedure' which involved stopping work.
- Tim Noted that- as with the other PAD on Bark Hut Road- there was unlikely to be middens, scarred trees, burials and no known historical or mythological sites were known in the area. If there was sites they would likely be low density stone artefact scatters which have likely been disturbed when the land was cleared. Noted that there were no sites which would likely stop the development based on cultural or scientific significance.
- Ian Indicated that test pit excavations should be completed prior to going to the DA- this would clear up the matter of whether an AHIP is required or not. Discussed the delays of stopping work if artefacts are found during construction works.
- Tony Agreed that there are problems stopping work during construction and that he recommends getting an AHIP prior to starting the work.
- Tim Suggested and a Cultural Heritage Management Plan could be a minimum requirement for the rezoning.
Noted the other sites at Hearn's Lake and McIntosh Crescent are close by and similar- both of those projects required test pit excavations.
- General discussion of the proximity of the knoll to other landmarks and access routes up Woopi Creek. Noted that the estuary is a fair way downstream- but the knoll is still a good campsite.
- Agreement to recommend test pit excavation prior to development consent to determine the requirement for an AHIP. Noted that the rezoning would be OK based on what is thought to be on the knoll.

Tim Hill BA (Hons.)

Senior Archaeologist



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Fax: (07) 3368 2440
Email: t.hill@everick.com.au

Web: www.everick.com.au





APPENDIX E: CORRESPONDENCE FROM JAGUN ELDERS

From: Simone Perkins [mailto:simone@jagunagedcare.com.au]

Sent: Monday, 22 January 2018 8:41 PM

To: Tim Hill <t.hill@everick.net.au>

Subject: RE: Bark Hut Road AHIP consultation/ site inspection

Hi Tim

Tony has reviewed notes from AHIP Consultation meeting on 19/01/2018 and verifies are true and correct as per consultation discussions.

Simone Perkins

Jagun Aged Care

M: 0429 811 742

E: simone@jagunagedcare.com.au

Website: www.jagunagedcare.com.au