

BLACK MOUNTAIN PROJECTS HERITAGE CONSULTANTS



Figure 1: Above: R5 Development area identified by Goulburn Mulwaree Council



Figure 2: View west showing typical ground surface visibility, pasture grass and weed cover.

Aboriginal Cultural Heritage Assessment Report 137 Brisbane Grove Rd, Brisbane Grove, NSW

Report to Goulburn Mulwaree Council June 2022

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# ACRONYMS

ACHAR	Aboriginal Cultural Heritage Assessment Report
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
AR	Archaeological Report
HNSW	Heritage NSW, part of the NSW Department of Premier & Cabinet
GPS	Global Positioning System
GSV	Ground Surface Visibility
LALC	Local Aboriginal Land Council
MGA	Map Grid of Australia
NPW	National Parks and Wildlife
PAD	Potential Archaeological Deposit
RAP	Registered Aboriginal Party
SU	Survey Unit

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# **EXECUTIVE SUMMARY**

Tim Titheradge the owner is seeking Goulburn Mulwaree Council approval for part of his land to be rezoned R5 and subdivided into large lot residential blocks (the development area, Figure 3). The land adjoins Sofala, a heritage listed property at 137 Brisbane Grove Road, Brisbane Grove, NSW. Land bordering the river and a drainage line through the property is proposed to be zoned C2 Environmental Conservation and will not be developed. As part of the Development Application, Goulburn Mulwaree Council requires advice about the potential of the proposal to *harm* Aboriginal places and objects pursuant to the *National Parks and Wildlife Act* (1974).

The objectives of this Aboriginal cultural heritage assessment report (ACHAR) are to:

- Determine whether any Aboriginal places or objects of significance are present in the development area.
- Assess the impact of the subdivision works and their potential to *harm* Aboriginal objects or values protected under the NPW Act.
- Recommend whether further requirements must be met under clause 80C of the NPW Act including whether an application for an AHIP needs to be made for undertaking test excavations.

This assessment has:

- Found no evidence of Aboriginal sites and objects within the development area.
- Assessed the development area as comprising *disturbed land* under the meaning of clause 80B relating to section 87(4) of the NPW Act.
- Assessed the development area as having low archaeological potential to contain Aboriginal sites and objects.

It is recommended that:

- This proposal does not require any further assessment relevant to Aboriginal sites or objects protected under the NPW Act.
- Should Aboriginal objects be discovered during development works, all works in that area should cease and the proponent should contact Heritage NSW or a qualified archaeologist to seek some determination of the discovery and how to proceed.
- In the unlikely event that skeletal remains be discovered during earthworks, all works should cease and protocols consistent with Requirement 25 in the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (2010) be implemented.

While the undertaking of this Aboriginal cultural heritage assessment acts as a defence against harming or disturbing Aboriginal objects without an Aboriginal Heritage Impact Permit (AHIP), the undertaking of this assessment alone does not negate the need for an AHIP should Aboriginal objects be disturbed. Investigations for an AHIP require preparation of an Aboriginal Cultural Heritage Assessment and must also be supported by Aboriginal consultation in accordance with the process outlined in the *Aboriginal cultural heritage consultation requirements for proponents* (2010).

# DISCLAIMER

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# RESTRICTIONS

Information contained within this report is culturally sensitive and should not be made available to the general public. Restricted information includes, but is not limited to:

- Maps, reference coordinates or images which locate Aboriginal places and objects.
- Location or detailed information regarding places of Aboriginal cultural significance, as expressed or directed by representative Aboriginal people.
- Other culturally appropriate restricted information as advised by Aboriginal representatives and traditional knowledge holders.

Information in the report covered by the above categories should be redacted before being made available to the general public. This information should only be made available to those persons with a valid need for access.

# ACKNOWLEDGMENTS

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- Delise Freeman, Pejar Local Aboriginal Land Council
- Tim Titheradge, owner
- Kyle Moffitt, archaeologist

# 1 INTRODUCTION

## 1.1. PROPONENT AND PROPOSED ACTIVITY

Tim Titheradge the owner is seeking Goulburn Mulwaree Council approval for part of his land to be rezoned R5 and subdivided into large lot residential blocks (the development area, Figure 3). The land adjoins Sofala, a heritage listed property at 137 Brisbane Grove Road, Brisbane Grove, NSW. Land bordering the river and a drainage line through the property is proposed to be zoned C2 Environmental Conservation and will not be developed. As part of the Development Application, Goulburn Mulwaree Council requires advice about the potential of the proposal to *harm* Aboriginal places and objects pursuant to the *National Parks and Wildlife Act* (1974).

The proponent has engaged Black Mountain Projects Pty Ltd to provide this advice and to prepare an Aboriginal cultural heritage assessment report (ACHAR) consistent with the requirements of the NPW Act set out in the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (2011). The archaeological survey that informs this report has been conducted in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (2010).

## **1.2 STATUTORY CONTROLS**

Primary protection of Aboriginal heritage in NSW is established at the State level under the NSW National Parks and Wildlife Act 1974 and to a lesser extent the NSW Heritage Act (1977). Heritage NSW and its parent department is responsible for protecting and conserving Aboriginal objects and declared Aboriginal places in NSW.

Aboriginal objects are defined in the NPW Act as any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.

Aboriginal places are defined in NPW Act as a place declared under s.84 of the NPW Act that, in the opinion of the Minister, is or was of special significance to Aboriginal culture. Such areas need not contain any Aboriginal objects but can only be gazetted with the approval of the Minister.

Part 6 of the National Parks and Wildlife Act 1974 (NPW Act) provides specific protection for Aboriginal objects and declared Aboriginal places by establishing offences of harm. Harm is defined to mean destroying, defacing, damaging or moving an object from the land. There are a number of defences and exemptions to the offence of harming an Aboriginal object or place.

Aboriginal heritage may also be protected under Commonwealth and Local Government legislation being the Environment Protection and Biodiversity Conservation Act and Local Environmental Plans respectively.

A number of policies or guidelines are relevant to assist proponents avoid *harming* Aboriginal objects in NSW. These policies are listed below in order of their consideration within a planning context or assessment of a given proposal or activity:

- Aboriginal cultural heritage consultation requirements for proponents (2010)
- Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (2010)
- Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW (2010)
- Guide to investigation, assessing and reporting on Aboriginal Cultural heritage in NSW (2011)

The *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* sets out reasonable and practicable steps which individuals and organisations need to take in order to:

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

The Code of Practice also provides a generic due diligence process under Section 8 of the Due Diligence Code to be addressed by proponents. The basic sequential steps of the due diligence process require the proponent or their agent to consider the proposed activity or proposal and review whether:

- The activity or proposal will disturb the ground surface.
- The AHIMS database or other relevant databases record previously identified places.
- The activity or proposal occurs in areas where certain landscape features may indicate the presence of Aboriginal objects (on land that is not disturbed).
- Harm to Aboriginal objects or disturbance of the landscape feature can be avoided.
- An Aboriginal Cultural Heritage Assessment Report (ACHAR) and/or an Aboriginal Heritage Impact Permit (AHIP) is required.

The Due Diligence Code also discusses the common association between certain landscape features and the presence of Aboriginal objects as a result of Aboriginal people's use of those features. The Code defines the following landscape features (on land that is not *disturbed* land) and distance thresholds as indicating the *likely* presence of Aboriginal objects:

- Within 200m of waters, or
- Located within a sand dune system, or
- Located on a ridge top, ridge line or headland, or
- Located within 200m below or above a cliff face, or
- Within 20m of or in a cave, rock shelter, or a cave mouth

Consequently, if the proposal or activity is within the defined proximity thresholds to one of these landscape features (on land that is not *disturbed*) then the Code considers that there is a *likely* probability that Aboriginal objects will occur within the area.

Due diligence may also be addressed through other forms of assessment providing they meet the basic requirements set out above. A Review of Environmental Factors or other assessment under the *Environmental Planning and Assessment Act 1979* (EP&A Act) may also meet the requirements of the Due Diligence Code of Practice. While the undertaking of a due diligence process or equal assessment process acts as a defence against harming or disturbing Aboriginal objects without an Aboriginal Heritage Impact Permit (AHIP), the undertaking of these activities does not negate the need for an AHIP should Aboriginal objects be disturbed.

An application for an AHIP must be supported by a consultation process set out in the *Aboriginal cultural heritage consultation requirements for proponents* (2010) and an Aboriginal cultural heritage assessment report that complies with the requirements set out in the *Guide to investigation, assessing and reporting on Aboriginal cultural heritage in NSW* (2011).

The *Code of practice for archaeological investigation of Aboriginal objects in NSW* (2010)also provides standards and methods for how this investigation has been conducted and reported.

## 1.3 OBJECTIVES

The objectives of this Aboriginal cultural heritage assessment are to:

- Determine whether any Aboriginal places or objects of significance are present in the development area.
- Assess the impact of the subdivision works and their potential to *harm* Aboriginal objects or values protected under the NPW Act.

• Recommend whether further requirements must be met under clause 80C of the NPW Act including whether an application for an AHIP needs to be made for undertaking test excavations.

# 2 DESCRIPTION OF THE AREA

## 2.1 BOUNDARIES

The proposed activity is land to be rezoned R5 and subdivided into large lot residential blocks (the development area, Figure 3). The land adjoins Sofala, a heritage listed property at 137 Brisbane Grove Road, Brisbane Grove, NSW. It is located 1km south of the City of Gouburn in the Gouburn Mulwaree Council LGA in the Parish of Goulburn, Zone 55 (UTM).





Figure 3: Above: Development area identified by Goulburn Mulwaree Council for R5 Large Lot Residential. Below: Aerial view of the land (Southern Cross Consulting Surveyors).



Established trees of theSofala house blockwith road reserve at the centre..



View west showing typical pasture grass and weed cover reducing ground surface visibility.



Sofala's outbuildings seen from the fields below showing dense pasture grass cover.



One of two stock dams. The excavated banks were examined for any artefacts. None were found. Figure 4: Views of the development area

## 2.2 DESCRIPTION AND PLAN OF AREA

The development area (Fig 3) is gently sloping grazing land proposed for R5 Large Lot Residential Subdivision. It has been mostly cleared and sown with pasture crops. Some scattered trees remain. Land adjoining the development area, near the Mulwaree River and the north-south drainage line, is proposed for C2 Environmental Conservation and will not be developed.

## 2.3 ENVIRONMENT

The development area is located in the Mulwaree floodplain, southeast of the Mulwaree River near Goulburn. It includes frontage on the Mulwaree River in a landform primarily classified by the NSW Soil and Land Information System as Gundary Plains.

### **Gundary Plains Landform**

Sofala is centred within a Gundary Plains landform, with the southwest corner of the property transitioning into a Bullamalito landform. Gundary Plains is part of a broader landform comprising rises and plains on Towrang Beds (metamorphic) in the Gundary Plains, Baw Baw Hills, Braidwood Rises and Bullamalito Hills. The local relief is 2-30 m, altitude 629-743 m, slopes 1- 10%; rock outcrop <2%. Soils include Red Kandosol/Kurosol intergrade (Red Earth/Red Podzolic intergrade), Red Chromosols (Red Podzolic Soils), Brown Chromosols (Soloths), and Yellow/Brown Kurosols (Yellow Podzolic Soils).

The landscape is composed of extensively cleared dry tussock native grassland. Subdominant areas of open woodland may have occurred on isolated hills. Lower slopes are dominated by Themedatriandra (kangaroo grass) with minor grasses such as Poa sieberiana (tussock grass), Stipa sp. (spear grasses), Dichelachne sp. (plume grass), Danthonia sp. (wallaby grasses), and a great diversity of forbs including Asperula conferta (common woodruff), Calocephaluscitreus (lemon beauty heads), Eryngium ovinum (blue devil) and Chrysocephalumapiculatum (button flower). Low shrubs such as Cryptandaraamara (bitter cryptandra) and Melichrus urceolata (urn heath) are found in these lower grasslands. Upper slopes tend to be dominated by Danthonia sp. (wallaby grasses) and Stipa densiflora (foxtail speargrass), with many forbs present including Eryngium ovinum (blue devil), Wahlenbergia sp. (blue bells) and Chrysocephalumapiculatum (yellow buttons). On shallower soils, the grass Joycea pallida (silvertop wallaby grass) dominates. On upper slope areas are found shrubs such as Pultenaea sp. (egg and bacon peas), Daviesia sp. (pea), Cassia sp. and Kunzea parvifolia (violet kunzea). Trees are generally sparse, especially on lower slopes, where Eucalyptus pauciflora (snow gum) may be found as scattered clumps or isolated individuals. Midslope areas are occupied by Eucalyptus melliodora (yellow box) and E. bridgesiana (apple box), also as scattered clumps or isolated individuals. In disturbed or altered areas, common pasture species exist dominated by Phalaris aquatica (phalaris), Paspalum

dilatatum (paspalum), Trifolium sp. (clovers), Hypochaerisradicata (catsear) and Plantago lanceolata (ribwort) along with common weed species such as Cirsium vulgare (spear thistle).

### Soils, Geology and Climate

The typical soil landscape at Sofala is a Gundary Soil Landscape (YP-gu). This is a moderately deep, acid or neutral, red, orange or yellow duplex soil. A2 horizons are usually present and may be bleached. B horizons are usually mottled. Red Podzolic Soils (Dr2.21) occur on upper slopes with Yellow Podzolic Soils (Dy3.21, Dy3.41) in mid and lower slope positions. GleyedSolodic Soils (Dg3.42) can be found in the drainage lines.

Local soils have formed *in situ* from alluvial-colluvial material derived from parent rock derived from a Siluro-Devonian sequence of the Towrang Beds. Dacite, andesite, tuff, tuffaceous sandstone and mudstone occur locally. Occasional thin bands of volcaniclastic roundstone conglomerate can also be found. Some aeolian influence on soils occurs.

Brisbane Grove is in Climatic Zone 3D with an annual average rainfall around 650 mm. Peak rainfall occurs in summer. The Gundary Plains are very cold in winter and subject to severe frosts, as well as to strong winds in summer that dry in soil. These local climatic features limit cultivation.



Figure 5 – Gundary Soil Landscape Profile provided by eSPADE, NSW Government (2022).

### 2.4 LAND USE

#### **Aboriginal Land Use**

The Goulburn Mulwaree LGA Aboriginal Heritage Study (2012) provides an overview of Aboriginal land use in the area. The earliest recorded archaeological site near Goulburn is the Birrigai rock shelter located approximately 80km south east of the study area. Radiocarbon dates obtained from the site, show that Aboriginal people have lived in this region for at least 21,000 years (Flood 1996:33- 35), however, the majority of archaeologically excavated sites in the region date to within the last 3,000 to 5,000 years, when the local climate and environment became warmer (Flood 1980:3,18).

Charles MacAlister, who grew up in the Goulburn region in the 1830s noted the relationship between local indigenous groups and reported "three fairly numerous tribes" in the district which he called the Cookmai or Mulwarrie (Mulwaree), the Tarlo, and the Burra Burra (MacAlister 1907:82). Norman Tindale describes two major language groups within the Goulburn region at the time of European settlement: the Gandangara to the north of Goulburn, and the Ngun(n)awal to the south.

Aboriginal people in the Goulburn area were in frequent contact with surrounding groups due a lack of natural physical barriers (Smith 1992:3). As a result, frequent gatherings of indigenous people took place in Goulburn, with records of corroborees being held at Rocky Hill near the East Goulburn Church of England, the old railway quarry on the Wollondilly River, and Mulwaree Flats near the bridge at the brewery, as well as where the All Saints' Church in Eastgrove and Goulburn railway station are now located (Tazewell 1991:243; Wyatt 1972:111-112).

These gathering places are located near reliable water sources such as the Mulwaree River, and are habitat for a variety of wildlife, including fish, eels, fresh water mussels and water birds. Other food resources included kangaroos and wallabies and small marsupials such as possums and bandicoots. Emu, wild turkey, echidna, snakes, native bees and ants would have also supplemented the traditional diet (Bennett 1967 [1834]:173,301; Govett 1977 [1836-7]:29,32,34- 35,37; MacAlister 1907:88; Wyatt 1972:107; Koettig and Lance 1986:18).

Along the local river and stream banks, bulrushes were be collected in the spring and their starchy roots baked and eaten (Bennett 1967 [1834]:183; Gott 1999). In 1836, a Quaker missionary, James Backhouse, saw an Aboriginal woman eating sow-thistle (Backhouse 1843:441; Trott 1966). Govett also saw an Aboriginal man use an axe to cut into the bark of an apple-tree which grew on the alluvial flats near the river. A sweet, cider-like liquid flowed from the cut, which was collected and consumed (Govett 1977 [1836-7]:25). The white

secretions of insects were also collected from trees such as the Manna Gum (Aslanides 1983:2; Bennett 1967 [1834]:115,319-321).

In 1836, William Govett published a series of articles in *The Saturday Magazine* describing the Aboriginal people of the County of Argyle, and their customs. He noted that local people would sometimes hunt by setting grass fires in order to drive and spear kangaroos in large numbers. This technique also encouraged the regrowth of root and herb plants which could be eaten or used to draw kangaroos back to an area (Bennett 1967 [1834]:290; Govett 1977 [1836-7]:23).

Traditional land uses came to an end in the 1820s, when the woodlands were cleared for sheep and cattle grazing, with barbed-wire fencing partitioning the landscape from the 1860s (NPWS 2003:206). The change from a woodland to a grassland ecosystem, radically affected the biodiversity of the area and limited the traditional resources used by Aboriginal people. William Govett noted that:

The kangaroos have either been killed, or have fled in search of more retired forests. Sheep and cattle have taken their place, the emu and turkey are seldom seen, the millions of parrots have even become scarce ...(Govett 1977 [1836-7]:26).

Local Aboriginal people were devastated both by this loss of traditional resources and by introduced diseases. Surgeon George Bennet observed several Aboriginal people on the Gundary Plains with small-pox scars in the 1830s (Bennett 1967 [1834]:148). Francis Murphy of Bungonia reported in 1845 that the Aboriginal population in his area had diminished to 20-100 individuals, with survivors joining up with other people from the Goulburn district (Koettig and Lance 1986:14). Following the influenza epidemic of 1846-7, a local Aboriginal population of only 25 people was estimated by the Magistrate's bench (Tazewell 1991:244).

#### **European Land Use**

Europeans first arrived in the Goulburn region in 1798, when Governor Hunter sent John Wilson and two other men on an expedition to the southern tablelands of NSW. The men reached Mt Towrang without seeing or encountering any Aboriginal people (Flood 1980:30). Joseph Wild's expedition in 1820 to find Lake George opened the country to European settlement.

Pastoralists immediately began clearing the land and improving pastures for cattle and sheep grazing. These practices have resulted in moderate to severe gully erosion across the higher ground of the development area, with a minor structural decline and sheet erosion of topsoils. Within the lower lying Gundary Plains landform of the property, minor cultivation of lucerne and fodder crops may have occurred in the past. Moderate sheet erosion and

minor wind erosion have affected this ground, probably during periods of drought. Gully erosion in the lower lying part of the property is minimal; however, topsoil structural decline may be common in some areas due to overgrazing and cultivation disturbance.

The development area is farm fields above the Mulwaree River. It covers approximately 80ha of gently sloping grazing land. It has been mostly cleared and sown with pasture crops. Some scattered trees remain. The eastern end of the development area is on the Mulwaree River frontage. The development area includes land within 200m of waters. The *Due Diligence Code* defines this as a "landscape feature that is *likely* to contain Aboriginal objects". However, agricultural activities have altered this landscape. These activities have included vegetation clearing, mechanical excavation, cultivation, cropping, grazing and tree planting. Land clearing and cultivation in particular, have resulted in disturbance of ground surface and churning of sediments, erosion and redeposit of soil. The resulting landscape is one of ground surface disturbance and accelerated removal and redeposition of surface soils. So although the development area was undoubtedly part of the landscape used by Aboriginal people in the past, the likelihood of artefacts being found *in-situ* is low.

Photos and field observations in the survey results section provide further details.

# **3** CONSULTATION PROCESS

### 3.1 REQUIREMENTS

Aboriginal consultation is an integral part of the process of investigating and assessing Aboriginal cultural heritage. Under the NPW Act, Aboriginal people who hold cultural knowledge about the area, objects and places that may be directly or indirectly affected by the proposed activity must be given the opportunity to be consulted. This is done through the process of investigating, assessing and working out how to manage the harm from the proposed activity. Consultation must adhere to requirements set out in clause 80C of the NPW Act where:

- an application for an AHIP will be made, or
- when undertaking test excavation according to the *Code of practice for archaeological investigation of Aboriginal objects in NSW*.

The relevant archaeological codes and guides only require Aboriginal consultation when impacts to Aboriginal heritage are envisaged. The *Due Diligence Code of Practice for the Protection of Aboriginal Objects NSW* (2010) does not require Aboriginal consultation. *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (2010) outlines how a statutory process of Aboriginal consultation is required when applications are made for permits to carry out archaeological excavations and impact Aboriginal sites (such permits are not being sought by this report).

## 3.2 CONTEXT AND LIMITATIONS

Although the NPW Act refers specifically to Aboriginal objects and places, the investigation requires a broader focus than just the objects or places. It also requires a knowledge and understanding of their context. Context is provided through consultation with Aboriginal people in order to reveal the meaning and significance of the objects and places. In consulting with Aboriginal people, the following limits on the use of existing information must be appreciated:

- Aboriginal people involved in previous studies or surveys may not have disclosed the existence of places with cultural heritage values as they may not have been under immediate threat when the earlier study was undertaken
- A report from AHIMS does not represent a comprehensive list of all Aboriginal objects or sites in a specified area as it lists recorded sites only and is mostly a record of survey effort.

## 3.3 REGISTERED ABORIGINAL PARTIES

The Pejar Local Aboriginal Land Council is the Registered Aboriginal Party (RAP) associated with this development area.

The proposed subdivision is assessed to be in a previously disturbed area and no Aboriginal objects or potential archaeological deposits have been identified. Impacts to aboriginal heritage are not envisaged and so there is no formal requirement to obtain Aboriginal consultation. However, the Goulburn Mulwaree Council values its relationship with the local Aboriginal community and Council planners expressed a wish to see a representative of the Pejar LALC employed to accompany the archaeologist in an inspection of the development area, in order to provide comment on behalf of the local Aboriginal community. The accepted principle is that "the LALC speaks for country."

### 3.4 RESULTS OF CONSULTATION

Refer to Appendix A.

# 4 SUMMARY AND ANALYSIS OF BACKGROUND INFORMATION

### 4.1 ABORIGINAL ARCHAEOLOGICAL CONTEXT

Two significant archaeological studies are relevant to the Goulburn Mulwaree LGA. Koettig and Lance (1986) prepared a planning study which identified areas of known or potential Aboriginal cultural and archaeological significance. Their report also included an analysis of site distribution patterns in the landscape in relation to environmental variables such as landform, geology, and distance from water (Koettig and Lance 1986:26). The general trends in site distribution identified by Koettig and Lance are summarised in the Goulburn Mulwaree Aboriginal Heritage Study (2012:30-32):

- Artefact scatters are the most common type of site in the region, and have been identified in all environmental contexts. They are most likely to occur on gentle, well-drained lower slopes within 100m of water. Artefact scatters at the junction of watercourses tend to be large, with high densities of stone artefacts. Underlying geology does not appear to be a significant factor in the location of this type of site.
- Quarries may be present on outcrops of raw stone materials suitable for artefact manufacture, many of which occur within the study area as localised, discrete outcrops of siliceous rocks (pebble beds, quartz veins or outcrops). Types of stone used in the manufacture of tools include chert, silcrete, quartz, quartzite and fine-grained volcanic rocks.
- Burial sites are rare, and historical sources indicate that they are most likely to be found on ridges and hill tops, in hollow trees, and in caves. In some cases, they may also occur in sand bodies. Burials may be difficult to identify, as features that were used by Aboriginal people to mark graves, including carved trees and earth mounds, are unlikely to be preserved.
- Modified trees (scarred or carved) are rare, as scars are finite in age, only likely to be
  present on trees at least 80-100 years old. Moreover, natural vegetation in the
  Goulburn region has been altered by fire and forest clearance. Most of the recorded
  modified trees in the development area have been destroyed in bushfires or
  removed to museums, such as the carved trees that were recorded at Yarra railway
  station and Armstrong's Paddock, Bungonia.
- Bora grounds are rare, and based on available site information and historical sources are most likely to be located on hill tops; however, their location cannot be predicted accurately.
- Shelters with art or deposit are found only in areas with suitable rock overhangs, such as sandstone outcrops with cavernous weathering. Large granite boulders and limestone rock shelters were also used as shelters.
- Grinding grooves are most commonly found near creek lines with suitable sandstone outcrops. Sandstone slabs were also transported into areas where there was no suitable stone.

Koettig and Lance's model was later field-tested by Fuller (1989), who surveyed a representative sample of environmental zones within the City of Goulburn. Fuller identified seventeen stone artefacts scatters and five isolated artefacts during the study. Two sites, located within 150m of an intermittent watercourse, also contained fragmented midden material, comprising mussel shell and shell from an unidentified species (Fuller 1989:5-6). Fuller's study located sites in all environmental zones, including those identified by Koettig

and Lance as having low archaeological potential. Fuller's study contributed to a revised site distribution model for Goulburn (Figure 5); however, it should be noted that the distribution model remains somewhat generic, especially near water courses, and requires further refinement.

Other small scale archaeological studies have been carried out within Goulburn Mulwaree LGA, mostly in response to proposed developments (e.g. Koettig 1988; Navin Officer 2003; Williams 2004); linear surveys for infrastructure projects such as proposed roads, transmission lines and water supply schemes (e.g. Koettig 1983; Navin Officer 2010; Silcox 1995); and surveys over larger areas for a variety of purposes including proposed quarries, subdivisions, mining leases and State Recreation Area management (e.g. ERM 2006; McBryde 1975; Hughes 1984; Haglund 1986; Silcox 1988).

Most of these studies use the Aboriginal site distribution model proposed for the City of Goulburn by Koettig and Lance (1986) and later revised by Fuller (1989). This continues to be the predictive model used within the Goulburn Mulwaree LGA, with previously recorded sites contributing to Aboriginal archaeological sensitivity mapping in the region. In interpreting these maps, it should be noted that the current distribution pattern is not a true representation of Aboriginal land use, but rather the result of sites discovered during small-scale development surveys. As a result, the map is biased towards water courses and developed parts of the LGA (Goulburn Mulwaree Aboriginal Heritage Study, 2012:32).



6 – Areas of Aboriginal heritage sensitivity in the north west section of Goulburn Mulwaree LGA (from the Goulburn Mulwaree Aboriginal Heritage Study, 2012:39).

## 4.2 AREAS OF ABORIGINAL HERITAGE SENSITIVITY

Based on the predictive model developed for the City of Goulburn by Koettig and Lance (1986) and later revised by Fuller (1989), the proposed subdivision at Sofala is located in an area of "potential archaeological artefacts". This is a low-level model of archaeological sensitivity based on generalised topographic modelling that considers sensitivity to increase in proximity to water courses. It does not take into account localised land disturbances (eg. cultivation, paddock improvement and erosion) which will impact site potential.

The result of this conjectural model is that about half of the land in the LGA has been mapped as "sensitive". This obliges the local council to require many archaeological surveys. Moreover, this modelling is an invitation for consultants to propose test excavations almost everywhere (because everywhere above a water course is claimed to be "sensitive"). Test excavations often find few or no artefacts. This requires expensive permits and requires artefact relocation out of its original site. Small artefact numbers are consistent with general background density (i.e. the density of stone artefacts across any landscape on the continent).

Test excavation, only in areas predicted to be "sensitive", can lead to confirmation bias: Consultants excavate for artefacts in predicted areas. They can then find several artefacts in those predicted areas, thereby confirming the model. The crucial factor of ground disturbance (by two centuries of traditional farming practices and other activities) is not part of the topographic modelling. Levels of ground disturbance are best verified on site by an inspection on foot ("ground truthing"). Hence this survey report.

## 4.3 AHIMS SEARCH RESULTS

A search of the Aboriginal Heritage Information Management System or AHIMS register was undertaken. A basic search of the property address 137 Brisbane Grove Road, Brisbane Grove showed no previously recorded Aboriginal sites in or near the address (see below). An extensive search was, however, prompted by David Kiernan, Goulburn Mulwaree Council's Senior Strategic Planner.

The extensive AHIMS search of utilising Lot 2 DP 1180093- the large lot adjacent the riverwith a search buffer of 1km included the whole development area as well as a large area around it. It revealed a total of 12 Aboriginal sites (see Appendix B). All these registered sites are outside the development area and would therefore not be harmed by the proposed subdivision.

Site cards for each of the registered sites were then obtained. The site cards document the nature of each registered site and the circumstances which resulted in it being recorded. They result from three surveys:

- Rex Silcox's 1983 survey of the Goulburn bypass route. This was mainly above a gully to the north of Marian Hill. This is the main cluster of recordings.
- Lyn O'Brien's 2018 due diligence survey of a property off Tait St (2 site recordings).
- Matthew Barber's due diligence survey of a property off Sloane St (1 artefact in imported gravel).

# Summary of recorded sites (from site cards provided by AHIMS)

Site ref	Location	Stone artefacts	Area	Details
51-6- 0013	Along bank of gully north of Marian Hill	2	1 sq m	Rex Silcox. 1983 "Archaeological Survey of Goulburn Bypass Route". 2 silcrete artefacts.
51-6- 0014	Along bank of gully north of Marian Hill	4	40 m length of bank	Rex Silcox. 1983 "Archaeological Survey of Goulburn Bypass Route". 4 artefacts.
51-6- 0015	Along bank of gully north of Marian Hill	2	5m length of bank	Rex Silcox. 1983 " <i>Archaeological Survey</i> <i>of Goulburn Bypass Route</i> ". 2 silcrete artefacts.
51-6- 0016	Along bank of gully north of Marian Hill	7	25 x 2 m	Rex Silcox. 1983 " <i>Archaeological Survey</i> of <i>Goulburn Bypass Route</i> ". 7 quartz artefacts.
51-6- 0017	Along bank of gully north of Marian Hill	5	20 x 20 m	Rex Silcox. 1983 " <i>Archaeological Survey</i> of Goulburn Bypass Route". 4 artefacts over 20 x 20 m area plus one silcrete core 50 m up slope.
51-6- 0018	Along bank of gully north of Marian Hill	17	80 m length of bank	Rex Silcox. 1983 "Archaeological Survey of Goulburn Bypass Route". 17 artefacts.
51-6- 0019	On hill slope north of Marian Hill	30	50 x 40 m	Rex Silcox. 1983 "Archaeological Survey of Goulburn Bypass Route". 30 artefacts.
51-6- 0020	On hill slope north of Marian Hill	13	30 x 40 m	Rex Silcox. 1983 " <i>Archaeological Survey</i> of <i>Goulburn Bypass Route</i> ". 13 silcrete artefacts.
51-6- 0021	Ploughed levee bank adjacent to east bank of Mulwaree R	>100	300 x 100 m	Rex Silcox. 1983 "Archaeological Survey of Goulburn Bypass Route". Estimated density one per sq. m. Test excavation found a range of stone materials and range of tool types across different time periods.
51-6- 0844	Off Tait St.	7	40 x 40 m	Lyn O'Brien. (T 0403 021296). " <i>Past</i> <i>Traces 2018 – Tait St. Due Diligence</i> <i>Report</i> ." 7 artefacts. Erosion exposures in redeposited soils above a stock dam on drainage line.
51-6- 0845	Off Tait St.	19	50 x 50 m	Lyn O'Brien. " <i>Past Traces 2018 – Tait St.</i> <i>Due Diligence Report.</i> " 19 silcrete and flaked glass artefacts. Ground exposed by stock resting around a tree.
	Off Sloane St Goulburn	1	Isolated find.	Matthew Barber.2020 (T 0407 485018). " <i>NGH Goulburn Rezoning Aboriginal Due Diligence.</i> " 1 silcrete artefact in imported gravels.



Figure 7 – Registered Aboriginal sites (in red) northwest of the development area.

### 4.4 SURVEY METHOD

Peter Kabaila of Black Mountain Projects, accompanied by the owner, conducted a site inspection of the development area on Thursday 13th May 2021. The inspection was via a series of pedestrian transects.

Exposures and erosion scars were included in the survey to ensure that any areas of archaeological potential were inspected.

The survey focussed on areas of exposure that may reveal archaeological materials and this methodology sometimes resulted in a meandering transect. The survey route is shown in red on the aerial image below.



Figure 8 – Survey route approximation (outlined in red)

## 4.5 SURVEY RESULTS

Because dense growth of pasture grasses limited ground surface visibility to less than 1%, the survey combined pedestrian transects with transport by vehicle to sample and examine exposures on the ground.

Historically the lots around the Sofala property have been treated as farmland. The soil is sandy loam. Under past farming practices this soil type was regarded as arable. The naturally occurring raw stone is quartz gravel and decomposed shale which were unsuitable for Aboriginal stone tool making. During inspection, no imported stone material was found.

Prior to the current owners, the Humes used the Garroorigang part of the property (the river flats in the 100 year flood line) as dairy grazing. The river flats therefore were ploughed and cropped by the Hume family for over 100 years.

Prior to the current owners, the Sofala part of the property was owned by Wendy Taylor. The Taylors ran Sofala as a family farming operation and ploughed it all many times and sowed pasture crops for grazing and cereal crops for making hay for the winter.

During the late 20th century there was a shift in farm practices from field ploughing to direct drilling. The current owners no longer ploughed Sofala but sprayed for noxious weeds and then resowed with rye grass. They also sprayed land near the river (part of the Hume family's property Garroorigang) and direct drilled with lucerne. The lucerne crop has been harvested for hay and then grazed for the last 15 years.

The summary of past land use is:

- Clearing of original old growth trees.
- Farming by plough, as this land was arable.
- Sewing of pasture crops into ploughed fields.
- Weed spraying.
- Direct drilling for resowing with pasture crops.
- Construction of stock dams.
- Construction of house and small sheds.
- Sheep and cattle grazing.

Exposures, including excavated soil on stock dam banks, were examined for stone artefacts, but none were found. No imported flakeable raw stone material (e.g. silcrete or chert) was found.

The survey did not locate any Aboriginal objects or sites within the development area. No specific areas of Potential Archaeological Deposit (PAD) were identified or discernible. Archaeologically this land surface and sediments are highly disturbed and have low archaeological potential to contain in-situ Aboriginal artefacts. Although in pastoral use, this is not a pristine hunter gatherer landscape but could be characterised as a "European settler landscape". A search was made for Aboriginal scarred trees. None were found. No pre-European old growth trees were found.





Decomposed quartz

Decomposed shale gravel

Figure 9 –Two local raw stone materials found in the development area, neither suitable for Aboriginal stone tool making.

# 5 CULTURAL HERITAGE VALUES

# 5.1 ARCHAEOLOGICAL POTENTIAL

### Registered sites 51-6-0013 to 51-6-0021 (gully near Marion Hill and levee bank)

Rex Silcox's 1983 survey of the Goulburn bypass route was undertaken during the historic 1979-1983 Eastern Australian drought. The drought resulted in severe wind erosion, resulting in stone artefacts being exposed by erosion features such as the gully north of Marion Hill and its eroding hill slopes.

This cluster of 9 recorded sites is really one site. It is a sparse scatter of stone artefacts concentrated on the surface by vegetation loss and wind erosion. Photos of the ground conditions show the effects of drought. As sediments eroded away and were redeposited, the stone in the sediments stayed behind on the surface. This phenomenon, known as "lag", explains why stone artefact scatters were found along the eroding banks of the gully. The scatter is not necessarily a focus of Aboriginal land use or "camp site". It resulted from drought, erosion and re-deposition of gravels. This has been accelerated by European land use, resulting in *lag* of stone material that would otherwise have existed in low densities through sediments across the region (*background density*).

All 9 registered sites are outside the development area.



Figure 10: Site 51-6-0018 was visible during the peak of a drought in a highly eroded landscape

#### Registered sites 51-6-0844 to 51-6-0845 (off Tait St)

Lyn O'Brien's due diligence survey of a property off Tait St was carried out in 2018 under similar drought conditions. A record-breaking heatwave during the preceding spring contributed to the drought. Rainfall to the end of September 2018 was 191mm, the third lowest ever recorded.

Lyn O'Brien found artefacts exposed by two erosion features: redeposited soil near a stock dam excavation (site 51-6-0844) and erosion by cattle around an isolated shade tree (site 51-6-0845).These two recorded artefact scatters are not ancient "camp sites" but are erosion features caused by dam excavation and cattle.

Both registered sites are outside the development area.

#### Registered site 51-6-0869 (off Sloane St)

Matthew Barber's 2020 due diligence survey of a property off Sloane St recorded on stone artefact in imported gravel. This could be argued as "not a site", consistent with background density across the region. This registered site is outside the development area.

#### Conclusion regarding the registered sites in the 1km buffer area

All the above registered sites are outside the development area and would therefore not be harmed by the proposed subdivision.

Interestingly, none of the above site recordings are of pristine hunter-gatherer landscapes. All the above site recordings are *background density* stone artefacts in *disturbed ground* (as defined by the Due Diligence Code) concentrated on the surface by European land uses:

- Gullying formed by accelerated erosion
- Erosion by cattle
- Ploughing of an excavated levee bank
- Stock dam excavation

In the site recordings, groupings of stone artefacts were classified as "camping areas".

These sites don't represent ancient camping areas. They represent erosion features and redeposited gravels. Erosion features concentrate sparsely distributed stone artefacts into one dense layer on the ground surface.

Most erosion features on any land in Australia, when inspected at the peak of a drought, will contain a layer of stone artefacts on the surface. To interpret such artefact clusters as camping areas could speak to *apophenia* (the tendency to see meaningful patterns in random data). It would be unsafe to draw any conclusion from such clusters.

A background density of stone artefacts should be able to be found on any landscapes. However, on the Sofala property (the development area), cropping, vegetation cover and other farming activities have disturbed the ground surface. So any clusters of stone artefacts are unlikely to occur on the ground surface.

#### **Disturbed land**

The Due Diligence Code (2010:18) defines *disturbed land* as the subject of a human activity that has changed the land's surface, being changes that remain clear and observable. Examples of disturbed land include ploughing, construction of rural infrastructure (such as dams and fences), construction of roads, trails and tracks (including fire trails and tracks and walking tracks), clearing vegetation, construction of buildings and the erection of other structures, construction or installation of utilities and other similar services (such as above or below ground electrical infrastructure, water or sewerage pipelines, stormwater drainage and other similar infrastructure) and construction of earthworks (Due Diligence Code 2010:18).

The development area is cleared and largely devoid of native vegetation, vegetated by exotics and exhibited a range of disturbances resulting from earthmoving machinery, rural grazing and associated activity. The land is considered *disturbed land* within the meaning of the Code.

### Likely

*Likely* is not defined within the Due Diligence Code. Likelihood of finding *Aboriginal objects* is generally discussed in terms of archaeological potential or *sensitivity*. An index of likelihood has been devised and is presented below. Probability and confidence indicators are those used by the Australian Army Intelligence Corps S2 Aide-Memoire. The approach is reminiscent of *levels of evidence* used in biomedical science.

Potential to contain Aboriginal objects. (Archaeological potential or "sensitivity").	Confidence("likelihood")	% Probability
Very high	Almost	95% or
	certain/confirmed	greater
High	Probable	75%-95%
Moderate	Likely	50%-75%
Low	Possible	15%-50%
Very low	Unlikely/doubtful	15% or less

For the purposes of the Due Diligence Code, any ridgeline is considered *likely* to contain Aboriginal objects (and therefore of moderate or higher archaeological potential), unless it is *disturbed land*. Whilst the development area includes a hill crest and may have acted as a focus point for Aboriginal occupation in the past, the area is also *disturbed* within the meaning of the Code. This means that any Aboriginal objects that may be present are likely to also be *disturbed* and unlikely to remain in-situ. It should also be noted that within the local area there are areas far more *likely* to contain Aboriginal objects resulting from Aboriginal occupation, such as higher order tributaries.

On the basis of this assessment and the extent of disturbance the development area is assessed as having a low to very low potential to contain Aboriginal objects.

For the purposes of the Due Diligence Code, any land within 200m of waters is considered *likely* to contain Aboriginal objects (and therefore of moderate or higher archaeological potential), unless it is *disturbed land*. Whilst the development area includes a crest landform and land within 200m of waters and may have acted as a focus point for Aboriginal occupation in the past, the area is also *disturbed* within the meaning of the Code. This means that any Aboriginal objects that may be present are likely to also be *disturbed* and unlikely to remain in-situ. It should also be noted that within the local area there are areas far more *likely* to contain Aboriginal objects resulting from Aboriginal occupation, such as raised banks along the Mulwaree River.

On the basis of this assessment and the extent of disturbance the development area is assessed as having a low to very low potential to contain Aboriginal objects.



Photos along the pedestrian survey route showing level of disturbance:

- 1. The Sofala house block is planted with introduced tree species.
- 2.Sandy loam soil exposed in vehicle tracks to the house ...
- 3. Typical grassed grazing land of the lots proposed for subdivision.
- 4.One of two stock dams.
- 5. Decomposed shale gravels exposed on stock dam bank. No artefacts were found.
- 6.View along road reserve to Sofala in the distance.
- 7. The only rock outcrop was of shale.
- 8.Boggy flood prone land beside Mulwaree River.
- 9.Wombat hole showing the sandy loam soil with no raw stone materials present.

### 5.2 STATEMENT OF SIGNIFICANCE

No Aboriginal objects or places have been identified in the development area.

# 6 IMPACTS OF PROPOSED ACTIVITY

## 6.1 PREVIOUS IMPACT ASSESSMENTS

Tim Titheradge the owner is seeking Goulburn Mulwaree Council approval for part of his land to be rezoned R5 and subdivided into large lot residential blocks (the development area, Figure 3). The land adjoins Sofala, a heritage listed property at 137 Brisbane Grove Road, Brisbane Grove, NSW. Land bordering the river and a drainage line through the property is proposed to be zoned C2 Environmental Conservation and will not be developed. As part of the Development Application, Goulburn Mulwaree Council requires advice about the potential of the proposal to *harm* Aboriginal places and objects pursuant to the *National Parks and Wildlife Act* (1974)..

No previous impact assessments related to the area of the proposed activity exist.

## 6.2 IMPACTS TO ABORIGINAL CULTURAL HERITAGE VALUES

The proponent has engaged Black Mountain Projects Pty Ltd and sought advice under the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (2011) to understand whether the works, being the development of the subdivision of Land parcels adjoining Sofala, have the potential to *harm* Aboriginal objects or values protected under the *NSW National Parks and Wildlife Act* (1974). This assessment has:

- Found no evidence of Aboriginal sites and objects within the development area.
- Assessed the development area as comprising *disturbed land* under the meaning of clause 80B relating to section 87(4) of the NPW Act.
- Assessed the development area as having low archaeological potential to contain Aboriginal sites and objects.

# 7 AVOIDING AND/OR MITIGATING HARM

There are no known Aboriginal objects or places in or near the development area. As a result, the proposed development will not harm any known Aboriginal objects or places. Should Aboriginal objects or places be discovered during the course of development, refer to the recommendations below.

# 8 **RECOMMENDATIONS**

## 8.1 MANAGEMENT RECOMMENDATIONS

The following management recommendations are based on the above conclusions and in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (2010). Should Aboriginal objects or places in the area of the proposed activity be discovered, more detailed investigation and an impact assessment will be required. Where an Aboriginal cultural heritage assessment does not indicate that there are (or are likely to be) Aboriginal objects, you can proceed with caution without an AHIP application.

On the basis of this assessment for Aboriginal objects and their protection under the *NSW National Parks and Wildlife Act* (1974) it is recommended that:

- This proposal does not require any further assessment relevant to Aboriginal sites or objects protected under the NPW Act.
- The proponent is aware that should Aboriginal objects be discovered during development works, all works in that area should cease and the proponent should contact Heritage NSW or a qualified archaeologist to seek some determination of the discovery and how to proceed.
- In the unlikely event that skeletal remains be discovered during earthworks, all works should cease and protocols consistent with Requirement 25 in the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (2010) be implemented.

### 8.2 ASSESSMENT STATEMENT

I, Peter Rimgaudas Kabaila, Heritage Consultant, confirm that:

- I have conducted a visual inspection on the site of the proposed development.
- I have prepared this report, which has objectively assessed the proposed development against the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (2010),*Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (2011) and *Aboriginal cultural heritage consultation requirements for proponents* (2010).

Peterkin Kuhn

Dr Peter Kabaila, Heritage Consultant, Black Mountain Projects Pty Ltd

# GLOSSARY

**Aboriginal object** A statutory term, meaning: '... any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains' (s.5 NPW Act).

**Declared Aboriginal place** A statutory term, meaning 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.

**Development area** Area proposed to be affected by the development proposal i.e. area covered by the archaeological survey.

**Harm** A statutory term meaning '... any act or omission that destroys, defaces, damages an object or place or, in relation to an object – moves the object from the land on which it had been situated' (s.5 NPW Act).

**Place** An area of cultural value to Aboriginal people in the area (whether or not it is an Aboriginal place declared under s.84 of the Act).

**Proponent** A person proposing an activity that may harm Aboriginal objects or declared Aboriginal places and who may apply for an AHIP under the NPW Act.

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# APPENDIX A – ABORIGINAL CONSULTATION

#### Aboriginal consultation log

Consultation with Delise Freeman, representing Pejar LALC.

Date	Request	Comm	Response
10.03.2022	Subject land inspection	Mobile call	LALC requested aerial image
	request.		of the land parcel, owner
			contact details, address and
			AHIMs search results, and
			draft report to prepare for
			the site inspection.
16.03.2022	Mobile text message to	Meeting on	LACL discussion with
	confirm inspection.	subject land	archaeologist and owner was
	Subject land inspection		wide ranging. No specific
	with Delise Freeman		objections were raised.
16.03.2022	Email thanking Delise for	Email	No response
	site inspection. Emailed		
	confirmation of inspection		
	with attached draft of		
	archaeologist's site notes.		
23.03.2022	Draft ACHAR provided for	Email	No response
	comment.		
06.05.2022	Follow up request for LALC	Email	No response
	response.		
20.06.22	Update re ACHAR	Mobile call	LALC invoice for inspection
	completion. Reminder to		received and paid
	invoice inspection.		

TAX INVOICE

Black Mountain Projectss,

Invoice Date 20 Jun 2022
Invoice Number INV-0028
ABN 72 662 632 151

Pejar Local Aboriginal Land Council 80 Combermere Street PO Box 289. GOULBURN NSW 2580

Description Quantity Unit Price GST Amount AUD For LALC inspection on 16.03.2022 "Sofala", 137 Brisbane Grove Road, Brisbane Grove (Tim Titheradge owner) Lots 2-5 DP62157, Lots 10-14 DP976708, Lots 15-21 DP976708, Lots 43-45 DP976708, Lot 39 DP976708, Lot 54 DP976708, Lot 2 DP1180093. 850.00 850.00 1.00 10% Subtotal 850.00 TOTAL GST 10% 85.00 TOTAL AUD 935.00

# **APPENDIX B – AHIMS SEARCH RESULTS**



Your Ref/PO Number : Sofala 137 Brisbane Grove

Black Mountain Projects Pty Ltd 5 Wangara St Aranda Australian Capital Territory 2614 Attention: Peter Kabaila

Email: peterkabaila1@gmail.com

Client Service ID: 651706

Date: 17 January 2022

Dear Sir or Madam:

AHIMS Web Service search for the following area at Address : 137 BRISBANE GROVE ROAD BRISBANE GROVE 2580 with a Buffer of 50 meters, conducted by Peter Kabaila on 17 January 2022.

The context area of your search is shown in the map below. Please note that the map does not accurately display the exact boundaries of the search as defined in the paragraph above. The map is to be used for general reference purposes only.

earch of Heritage NSW AHIMS Web Services (Aboriginal Heritage Information Management System) has shown at:

0	Aboriginal sites are recorded in or near the above location.
0	Aboriginal places have been declared in or near the above location. *

A basic AHIMS search of the property address 137 Brisbane Grove Road, Brisbane Grove showed no previously recorded Aboriginal sites in or near the address.



Your Ret/PO Number : Sofala 2/1180093 1km Client Service ID : 651527

Date: 14 January 2022

Black Mountain Projects Pty Ltd 5 Wangara St Aranda Australian Capital Territory 2614 Attention: Peter Kabaila

Email: peterkabaila1@gmail.com

Dear Sir or Madam:

AHIMS Web Service search for the following area at Lot: 2. DP:DP1180093. Section :- with a Buffer of 1000 meters, conducted by Peter Kabaila on 14 January 2022.

The context area of your search is shown in the map below. Please note that the map does not accurately display the exact boundaries of the search as defined in the paragraph above. The map is to be used for general reference purposes only.





12	Aboriginal sites are recorded in or near the above location.
0	Aboriginal places have been declared in or near the above location. *

An extensive AHIMS search of utilising Lot 2 DP 1180093- the large lot adjacent the river- revealed a total of 12 Aboriginal sites within 1000m radius.None of the registered sites are in the development area