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70 MANIFOLD ROAD, CASINO NSW

ABORIGINAL CULTURAL HERITAGE ASSESSMENT

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Jestermond Pty Ltd





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CONTENTS

1	INTRODUCTION	6
1.1	BACKGROUND	6
1.2	BRIEF & METHODOLOGY	6
1.3	REPORT AUTHORSHIP.....	7
2	LEGISLATIVE AND PLANNING CONTEXT	11
2.1	ENVIRONMENTAL PLANNING AND ASSESSMENT ACT (1979)	11
2.2	NATIONAL PARKS AND WILDLIFE ACT 1974 (NSW) AND REGULATIONS 2019 (NSW)	11
2.3	DUE DILIGENCE CODE OF PRACTICE FOR THE PROTECTION OF ABORIGINAL OBJECTS IN NSW	12
2.4	CODE OF PRACTICE FOR THE ARCHAEOLOGICAL INVESTIGATION OF ABORIGINAL OBJECTS IN NSW.....	13
2.5	RICHMOND VALLEY LOCAL ENVIRONMENTAL PLAN 2012	14
3	ENVIRONMENTAL REVIEW	16
3.1	LANDSCAPE SETTING.....	16
3.2	DISTURBANCE HISTORY	17
4	ARCHAEOLOGICAL SYNTHESIS AND PREDICTIONS	25
4.1	ABORIGINAL HERITAGE INFORMATION MANAGEMENT SYSTEM (AHIMS)	25
4.2	ETHNOHISTORY.....	27
4.2.1	<i>Observations of Aboriginal people on the Richmond River</i>	<i>27</i>
4.2.2	<i>Economy and resource-use.....</i>	<i>27</i>
4.2.3	<i>Prehistory</i>	<i>28</i>
4.3	LOCAL ARCHAEOLOGICAL STUDIES.....	28
4.3.1	<i>The Casino Bora Ring Aboriginal Place.....</i>	<i>28</i>
4.3.2	<i>Casino Freight Rail Terminal (Everick Heritage Consultants 2009, 2014)</i>	<i>29</i>
4.3.3	<i>Casino Industrial Rezoning (Everick Heritage Consultants 2019).....</i>	<i>30</i>
4.3.4	<i>Casino Wastewater Treatment Facility (Everick Heritage Consultants 2012).....</i>	<i>30</i>
4.4	REGIONAL ARCHAEOLOGICAL STUDIES.....	31
4.4.1	<i>McBryde (1974) and Coleman (1982).....</i>	<i>31</i>
4.4.2	<i>Godwin (1999).....</i>	<i>32</i>
4.4.3	<i>Regional Forest Archaeological Assessment (Hall and Lomax 1998)</i>	<i>33</i>
4.4.4	<i>Predictive model for the Study Area</i>	<i>34</i>
5	FIELD SURVEY: ABORIGINAL CULTURAL HERITAGE	35
5.1	CONSULTATION WITH CASINO BOOLANGLE LALC.....	35
5.2	PEDESTRIAN SURVEY	35
5.3	SURVEY RESULTS.....	39
5.4	REQUIREMENT FOR ARCHAEOLOGICAL TEST EXCAVATION.....	39
5.5	CULTURAL VALUES OF THE STUDY AREA.....	40
5.6	ASSESSMENT OF HARM	40
5.6.1	<i>Likely impacts.....</i>	<i>40</i>
5.6.2	<i>Impact Avoidance and Assessment</i>	<i>40</i>
6	MANAGEMENT RECOMMENDATIONS	42
6.1.1	<i>Recommendation 1: Aboriginal Objects Find Procedure</i>	<i>42</i>
6.1.2	<i>Recommendation 2: Aboriginal Human Remains.....</i>	<i>42</i>
7	REFERENCES	43
	APPENDIX A: AHIMS EXTENSIVE SEARCH RESULTS	45
	APPENDIX B: CONSULTATION WITH CASINO BOOLANGLE LALC	48
	<i>19th October 2023 Notification of the assessment.....</i>	<i>48</i>
	<i>27th October 2023- Calendar placeholder for site meeting</i>	<i>48</i>

FIGURES

FIGURE 1: 70 MANIFOLD ROAD: STUDY AREA LOCATION	8
FIGURE 2: 70 MANIFOLD ROAD: SUMMARY OF THE PLANNING PROPOSAL	9
FIGURE 3: 70 MANIFOLD ROAD: PROPOSED ROAD AND LOT LAYOUT PLAN	10
FIGURE 4: TOPOGRAPHY AND HYDROLOGY (SOURCE SIX MAPS)	18
FIGURE 5: GEOLOGICAL MAP OF CASINO (SOURCE GEOLOGICAL SURVEY OF NSW)	19
FIGURE 6: SOIL LANDSCAPE MODEL (SOURCE: ESPADE.NSW.GOV.AU)	20
FIGURE 7: 70 MANIFOLD ROAD- 1890 CROWN PLAN	21
FIGURE 8: 70 MANIFOLD ROAD- 1957 AERIAL PHOTO	22
FIGURE 9: 70 MANIFOLD ROAD- 1978 AERIAL PHOTO	23
FIGURE 10: 70 MANIFOLD ROAD- 1990 AERIAL PHOTO	24
FIGURE 11: AHIMS SEARCH RESULTS (#829977).....	26
FIGURE 12: LOCATION OF SURVEY TRANSECTS	36
FIGURE 13: LOOKING WEST FROM THE RIDGE CREST ACROSS THE MIDDLE SLOPES TO THE FARMHOUSE	37
FIGURE 14: EXAMPLE OF GOOD GROUND VISIBILITY UNDER A LARGE FIG TREE	37
FIGURE 15: INSPECTION OF THE MIDDLE SLOPES NEAR THE OLD DAM.	38
FIGURE 16: THE EDGE OF THE RIDGE CREST LOOKING NORTH-WEST TO THE TOP OF THE RIDGE.....	38

Tables

TABLE 1: STUDY AREA SOIL LANDSCAPES SUMMARY (SOURCE: ESPADE 2022)	16
TABLE 2: SUMMARY OF AHIMS SEARCH RESULTS BY SITE TYPE (AHIMS #829977)	25
TABLE 3: CALCULATION OF SURVEY COVERAGE/ EFFECTIVENESS BY SURVEY UNIT	35

ABBREVIATIONS

ACHA	Aboriginal Cultural Heritage Assessment
ACHAR	Aboriginal Cultural Heritage Assessment Report
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
DA	Development Application
DCP	Development Control Plan
DEECW	Department of Environment, Climate Change and Water (now Heritage NSW)
EARS	Environmental Assessment Requirements
EIS	Environmental Impact Assessment
EPA	Environmental Planning and Assessment
LALC	Local Aboriginal Land Council
LEP	Local Environment Plan
NPW	National Parks and Wildlife
PAD	Potential Archaeological Deposit
Project	The proposed nine lot rural residential subdivision (Lot 1 for the existing residential dwelling and Lots 2-9 being new Lots zoned R5 Large Lot Residential with a reduced minimum Lot size of 7500m ² at 70 Manifold Road North Casino, NSW
SU	Survey Unit
Study Area	Lot21 DP601461 located at 70 Manifold Road North Casino, NSW.

1 INTRODUCTION

1.1 Background

Heritage Management & Planning Pty Ltd has been commissioned by Jestermond Pty Ltd to undertake a Aboriginal Cultural Heritage Assessment (ACHA) to support the planning proposal to amend the Richmond Valley Local Environmental Plan (LEP) at Lot 21 DP 601461, being 70 Manifold Road North Casino NSW (the Study Area) (**Figure 1**). The planning proposal includes the following changes (see **Figure 2** and **Figure 3**):

- Rezone the subject land from RU1 – Primary Production to R5 – Large Lot Residential in accordance with the provisions of the Richmond Valley Local Environmental Plan 2012, and
- Amend the minimum lot size for subdivision to enable a minimum lot size of 7,500m².

The ACHA has been commissioned to consider the potential impacts of the proposed rezoning proposal on Aboriginal objects and cultural values, including potential impacts to the cultural landscape.

1.2 Brief & Methodology

The brief for the ACHA was to undertake an archaeological and cultural landscape in accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DEECW 2010A) (CoPAI).

The methods employed in this assessment include:

- a description of the planning proposal and potential impacts tot the ground surface that might reasonably result in Harm to Aboriginal objects
- a search of relevant Aboriginal heritage registers
- a review of environmental information relevant to the assessment
- a review of relevant archaeological and cultural heritage assessments in the local area and region
- development of an archaeological predictive model to inform the assessment methodology and impact assessment
- consultation with the Casino Boolangle Local Aboriginal Land Council (LALC) including documentation of the consultation process and how the consultation informed the assessment
- completion of archaeological investigations and provision of technical information to inform the impact assessment including:
 - i. a summary of the assessment methodology
 - ii. a description of results of the assessment including statements on the local and regional significance of archaeological sites identified within the Study Area, and
 - iii. statements on the adequacy of the assessment and the requirement for additional archaeological investigation
- an assessment of the cultural values (Social, Historic, Scientific, Aesthetic) of the Study Area including a Statement of Significance for Aboriginal cultural values, and

- an outline of measures to mitigate the impacts of the Project on cultural values and management recommendations to inform the planning proposal application, including any conditions/management recommendations to be incorporated into future project approvals.

1.3 Report Authorship

The study was undertaken by Tim Hill (BA. Hons. Archaeology and Palaeoanthropology, University of New England (1998)).

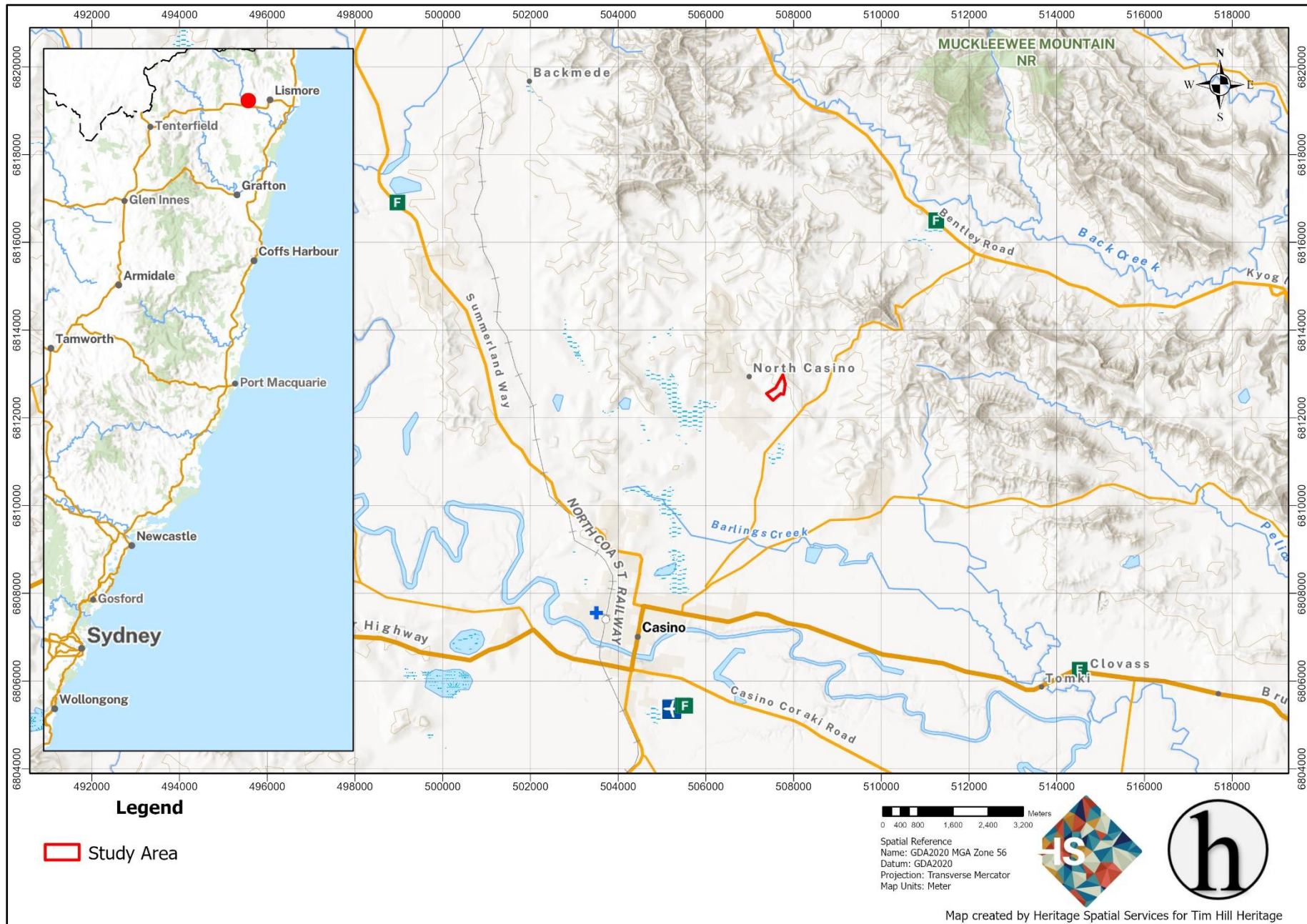


Figure 1: 70 Manifold Road: Study Area location

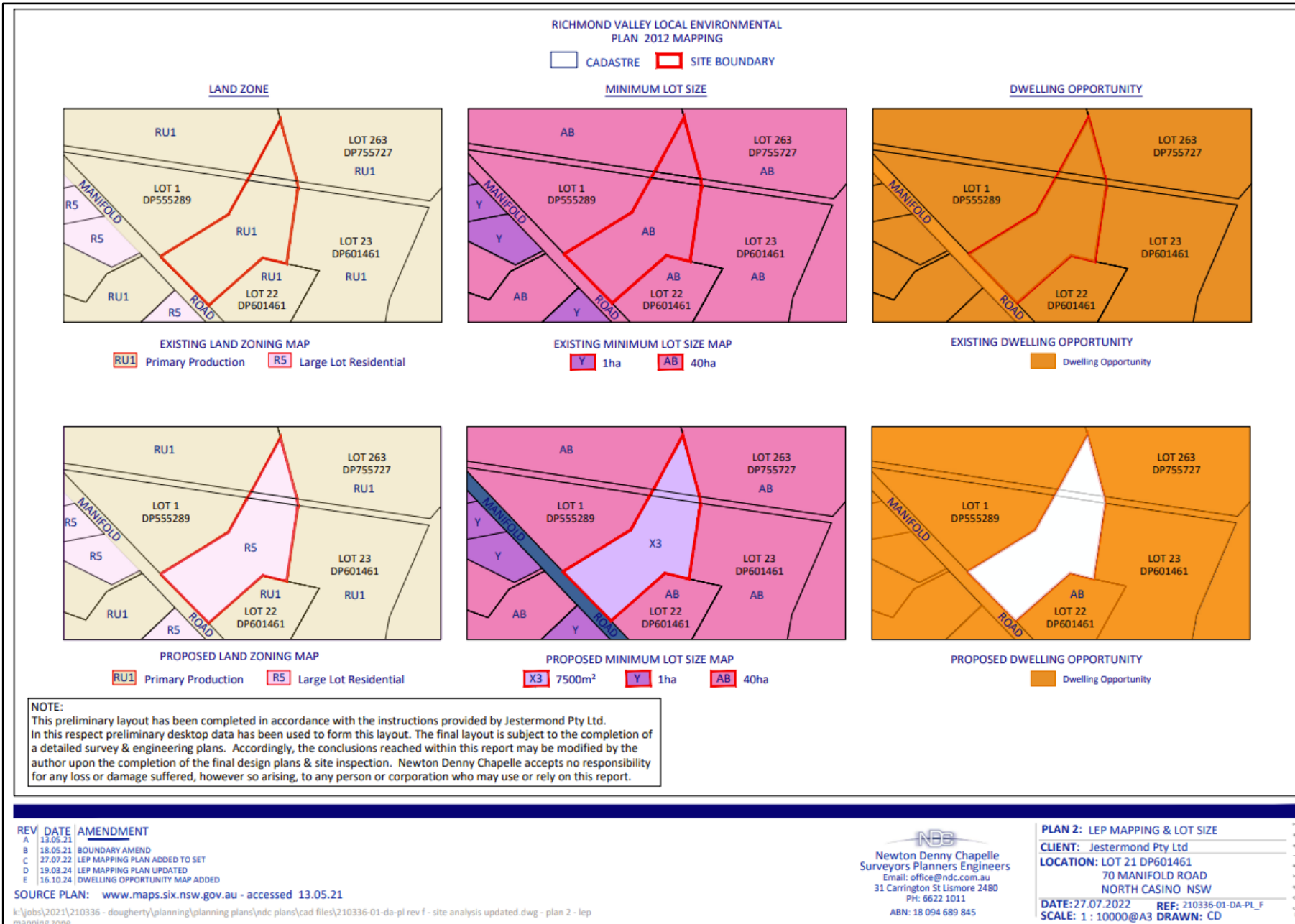


Figure 2: 70 Manifold Road: Summary of the Planning Proposal

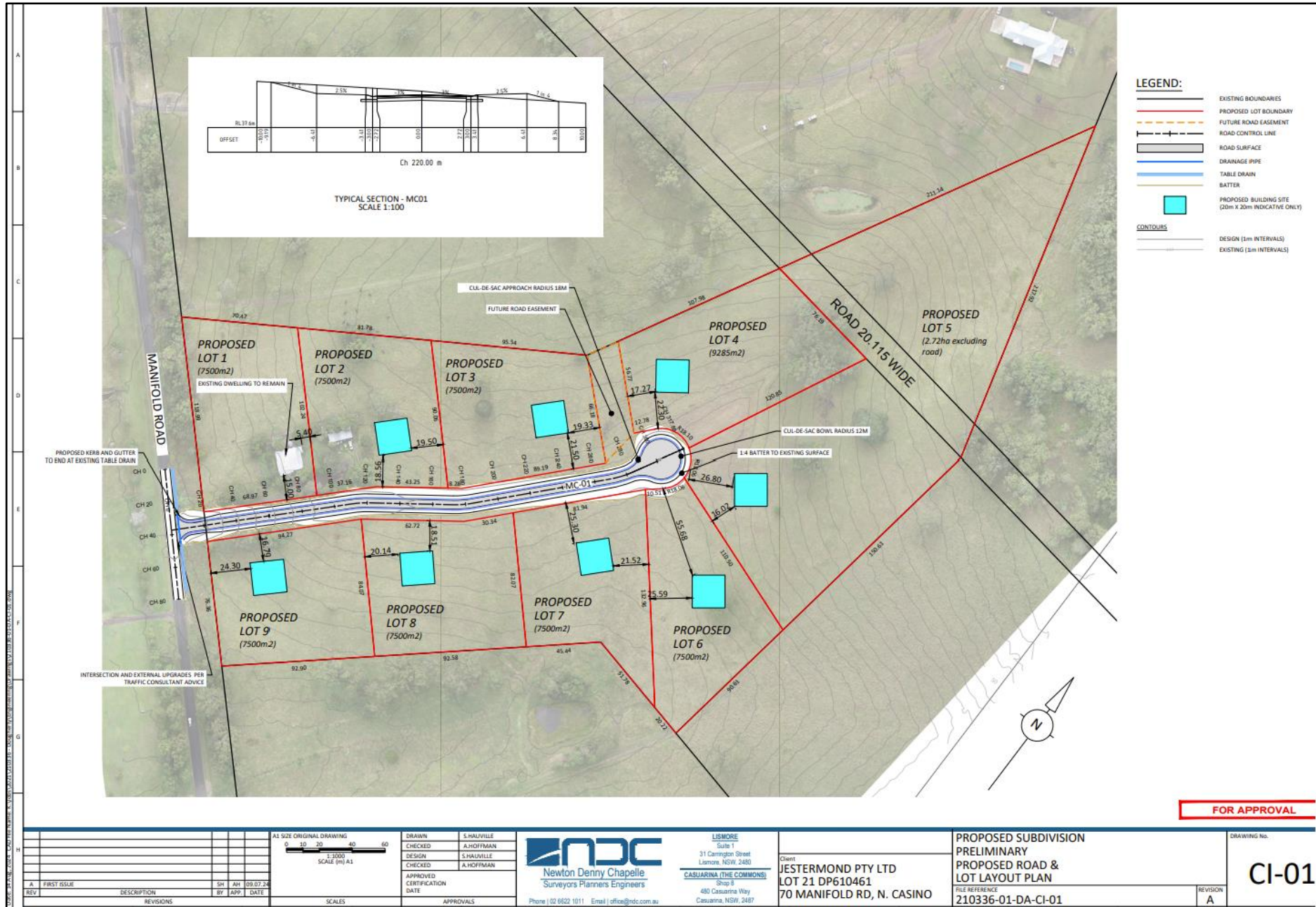


Figure 3: 70 Manifold Road: Proposed road and Lot layout plan

2 LEGISLATIVE AND PLANNING CONTEXT

2.1 Environmental Planning and Assessment Act (1979)

The Environmental Planning and Assessment Act (NSW) (1979) (EPA Act) provides a framework to environmental assessment and approvals in NSW. The EPA Act includes three parts relevant to ACHA assessments:

- Part 3- Planning instruments which include Local Environment Plans (LEPs), Development Control Plans (DCPs) and other strategic planning controls.
- Part 4- Development assessment and consent controls including approvals by local Councils and Regional Planning Panels.
- Part 5- Self assessment and approvals by a government agencies, or Determining Authorities, for infrastructure and environmental proposals, and for the approval of State Significant Infrastructure by the Planning Minister.

The Planning Proposal will be assessed under Part 3 of the NSW Environmental Planning and Assessment Act 1979 (EP&A Act). Any future works will be subject to approval by Richmond Valley Council under Part 4 of the EP&A Act.

2.2 National Parks and Wildlife Act 1974 (NSW) and Regulations 2019 (NSW)

The National Parks and Wildlife Act 1974 (NSW) (NPW Act) is the primary legislation concerning the identification and protection of Aboriginal cultural heritage in New South Wales. **Section 86** of the NPW Act provides offense provisions for Aboriginal objects, Aboriginal skeletal remains and Aboriginal places in NSW (see the definition of 'Harm' above). Three key definitions in the NPW Act which are relevant to this assessment include:

- **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 remains** means the body or the remains of the body of a deceased Aboriginal person, but does not include—
 - (a) a body or the remains of a body buried in a cemetery in which non-Aboriginal persons are also buried, or
 - (b) a body or the remains of a body dealt with or to be dealt with in accordance with a law of the State relating to medical treatment or the examination, for forensic or other purposes, of the bodies of deceased persons.
- **Harm** an object or place includes any act or omission that—
 - (a) destroys, defaces or damages the object or place, or

(b) in relation to an object—moves the object from the land on which it had been situated, or

(c) is specified by the regulations, or

(d) causes or permits the object or place to be harmed in a manner referred to in paragraph (a), (b) or (c),

but does not include any act or omission that—

(e) desecrates the object or place, or

(f) is trivial or negligible, or

(g) is excluded from this definition by the regulations.

Section 87 of the NPW Act outlines defences against prosecution relating to Aboriginal objects, skeletal remains and Aboriginal places. These include:

- Acting in accordance with an Aboriginal Heritage Impact Permit (AHIP) issued under **Section 90** of the NPW Act
- Demonstrating that the “defendant exercised due diligence to determine whether the act or omission constituting the alleged offence would harm an Aboriginal object and reasonably determined that no Aboriginal object would be harmed”
- The activity was prescribed as a “low Impact” activity or an “omission” under the NPW Regulations (2019), and
- Was undertaken in compliance with a Code of Practice adopted or prescribed by the NPW Regulations (2019).

The application of the *CoPAI* is considered an appropriate approval pathway as the Proposal does not meet the criteria of a ‘low impact activity’ as defined by the NPW Act and Regulations.

2.3 Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW

The purpose of the Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW (DEECW 2010A) is to establish a defence against prosecution in the event that Aboriginal objects may be inadvertently harmed during an activity (DEECW 2010B: 1 & 2). The Due Diligence Code of Practice:

...sets out the reasonable and practicable steps which individuals and organisations need to take in order to:

1. identify whether or not Aboriginal objects are, or are likely to be, present in an area
2. determine whether or not their activities are likely to harm Aboriginal objects (if present)
3. determine whether an AHIP application is required (DEECW 2010A:2).

The Due Diligence Code of Practice makes the following statement on the requirement for an AHIP (DEECW 2010A:2):

If Aboriginal objects are present or likely to be present and an activity will harm those objects, then an AHIP application will be required.

However, the practical application of the Due Diligence Code of Practice is that it is a process of establishing whether additional assessment is required. In the event that the Due Diligence assessment concludes that harm to Aboriginal objects is likely, additional archaeological investigation, including Aboriginal community consultation, in accordance with CoPAI is required.

A key limitation of the Due Diligence Code of Practice is that they do not clearly define the thresholds of “likely” or “highly likely”. To assist the assessment, the Merriam Webster dictionary definition (www.merriam-webster.com/dictionary) of “likely” is:

“Having a high probability of occurring or being true: very probable”

The Due Diligence Code of Practice makes an additional statement which removes the requirement to undertake additional investigation where there has been significance ground disturbance. The Due Diligence Code of Practice includes the following definition of ‘disturbed land’ (DEECW 2010A: 12, 18).

“Land is disturbed if it has been the subject of a human activity that has changed the land’s surface, being changes that remain clear and observable”.

The application of the previous disturbance provisions must be considered on a case-by-case basis. However, the general application of the existing disturbance defenses outlined in the Due Diligence Code of Practice is that the ground disturbance must have removed the portion of the soil profile likely to contain Aboriginal objects from the local area or be of a nature whereby the ground disturbance would significantly reduce the likelihood of finding Aboriginal objects as part of a Due Diligence/ archaeological investigation. This is primarily because the assessment procedures assume that the likelihood that an activity will impact Aboriginal objects can be determined using standard archaeological investigation methods. Archaeological investigation requires a sample survey to determine/ infer the likelihood that Aboriginal objects are present and the confidence in results from archaeological investigations is significantly reduced where the land has been subject to ground disturbance.

2.4 Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW

The CoPAI provides the following statement on the application of the Code:

“This Code has been developed to support the process of investigating and assessing Aboriginal cultural heritage by specifying the minimum standards for archaeological investigation undertaken in NSW under the NPW Act. Where an Aboriginal cultural heritage assessment requires an archaeological investigation to be undertaken, this must be done in accordance with the requirements of this Code.” (DEECW 2010A:2).

The purpose of this CoPAI is to (DEECW 2010A:1):

1. establish the requirements for undertaking test excavation as a part of archaeological investigation without an AHIP. If you comply with these requirements and you harm an Aboriginal object when undertaking test excavations, your actions will be excluded from the definition of harm and as such you will not be committing an offence of harm to an Aboriginal object.
2. establish the requirements that must be followed when carrying out archaeological investigation in NSW where an application for an AHIP is likely to be made. Under the NPW Act, the Director General can require that certain information accompany an application for an AHIP. This Code explains what that information is in relation to archaeological investigations.

Section 3.1 of the CoPAI (DEECW 2010B:24) makes the following comment on the requirement archaeological test-excavations as part of the assessment:

Archaeological test excavation will be necessary when (regardless of whether or not there are objects present on the ground surface) it can be demonstrated through Requirements 1, 2, 3, 4, and 5 that sub-surface Aboriginal objects with potential conservation value have a high probability of being present in an area, and the area cannot be substantially avoided by the proposed activity.

In this instance the term ‘high-probability’ is taken as being equivalent to ‘likely’ as used in the Due Diligence Code of Practice (DECCW 2010A). Although there is not a direct relationship between the requirement to apply for a AHIP and the requirement for archaeological test excavation, where the AHIP includes disturbance of soils which are also archaeological deposits test excavation is required to demonstrate the nature and extent of the archaeological site for the purposes of informing the significance and impact assessment.

2.5 Richmond Valley Local Environmental Plan 2012

The Richmond Valley Local Environmental Plan (LEP) (2012) provides a framework to determine activities which require development consent and outlines considerations for the determination process. This includes the following general classes of heritage:

- Items on the NSW State heritage Register
- Items of local heritage significance listed on Schedule 5 of the Richmond Valley LEP, and
- Aboriginal objects and Places as defined by the NPW Act.

The Richmond Valley LEP (2012) sets out provisions to control activities at “Aboriginal Places of heritage significance”, which include places which do not meet the definition of an Aboriginal object or Aboriginal places under the NPW Act but are listed under the LEP. Part 5.10.8 of the Richmond Valley LEP (2012) requires that Richmond Valley Council:

“... 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.

The Planning Proposal does not impact any areas identified as items of local heritage significance under the Richmond Valley LEP (2012).

3 ENVIRONMENTAL REVIEW

3.1 Landscape Setting

The Study Area is located on the edge of the Richmond River floodplain, which flows south-east to the Pacific Ocean at Ballina. The floodplain to the south of the Study Area comprises a remnant lagoon that would have been a paleochannel of the Richmond River. The Study Area is at approximately 30-60 metres above sea level and is located on a relatively large hill/ crest which runs east-west and forms part of the watershed of Barlings Creek (east) (**Figure 4**). The main topographic feature within the local area is Naughtons Gap, located to the north-east, which has an elevation of approximately 210 metres. The main hydrological feature relevant to the study is Whites Lagoon, located to the south-east of the Study Area, which forms on the upper floodplain of Barlings Creek.

The geology of the Study Area is mapped as part of the “Piora Member”, being part of the Grafton Formation, which comprise sedimentary rocks dating to the early Cretaceous (145-66 million years) period. The sedimentary beds contain a number of stone material types suitable for stone tool production including siltstone and claystone (see **Table 1** and **Figure 5**). Additionally, sandstone is widely utilised for the grinding and pounding of vegetable resources and to form and shape stone axes. However, it is noted that the lands to the east of Casino form part of the ‘Lamington volcanics’ which was formed by basalt flows which would be expected to contain better quality stone material, particularly for stone axe production.

The vegetation models for the Study Area include tall open woodland with a predominately grass understory (see **Table 1** and **Figure 6**). The 1890 Crown Plan (**Figure 7**) includes notes that the elevated ridge was “well timbered” and that the lower and middle slopes comprised “Ironbark and Bloodwood”.

Table 1: Study Area soil landscapes summary (source: eSpade 2022)

Soil Landscapes	
Namooma	<p>Landscape: Low hills on Grafton Formation sediments. Relief is 30–50 m, slopes 10–18%. Partially to extensively cleared tall open eucalypt woodland.</p> <p>Vegetation: Partially cleared tall open-woodland. Main species are spotted gum (<i>Eucalyptus maculata</i>), grey box (<i>Eucalyptus moluccana</i>), red bloodwood (<i>Eucalyptus gummmifera</i>) and narrow-leaved ironbark (<i>Eucalyptus crebra</i>). Grey gum (<i>Eucalyptus propinqua</i>, <i>E. biturbinata</i>), sydney blue gum (<i>Eucalyptus saligna</i>) and forest oak (<i>Allocasuarina torulosa</i>) are also present. Broad-leaved apple (<i>Angophora subvelutina</i>) occurs on lower slope areas. Broad-leaved paperbark (<i>Melaleuca quinquenervia</i>) is found in drainage depressions and on lower slopes immediately adjacent to poorly drained areas. Grass species include blady grass (<i>Imperata cylindrica</i>), kangaroo grass (<i>Themeda australis</i>), barbwire grass (<i>Cymbopogon refractus</i>), spear grass (<i>Heteropogon contortus</i>) and wire grass (<i>Aristida spp.</i>), narrow-leaved carpet grass (<i>Axonopus affinis</i>), as well as paspalum (<i>Paspalum dilatatum</i>), couch (<i>Cynodon dactylon</i>) and kikuyu (<i>Pennisetum clandestinum</i>). In poorly drained areas (such as where perched watertables exist) common rush (<i>Juncus usitatus</i>) is prolific.</p> <p>Geology: Grafton Formation: sandstone (lithic and quartz) with siltstone, claystone, coal.</p>

3.2 Disturbance History

Review of historic aerials was undertaken to understand the potential impact of historic land use on the potential for the Planning Proposal and future subdivisions to harm Aboriginal objects, with specific consideration of impacts to topsoils with the potential to contain Aboriginal archaeological sites. Aerial photos from 1957 (**Figure 8**), 1978 (**Figure 9**) and 1990 (**Figure 10**) demonstrate that the Study Area has been subject to significant ground disturbance from forest clearing and agriculture. This includes:

- Clearing of all native forests
- Construction of the primary dwelling at least prior to the 1950s
- Construction of a dam in the 1960's/ 1970s, and
- Cropping in the lower paddocks near Manifold Road.

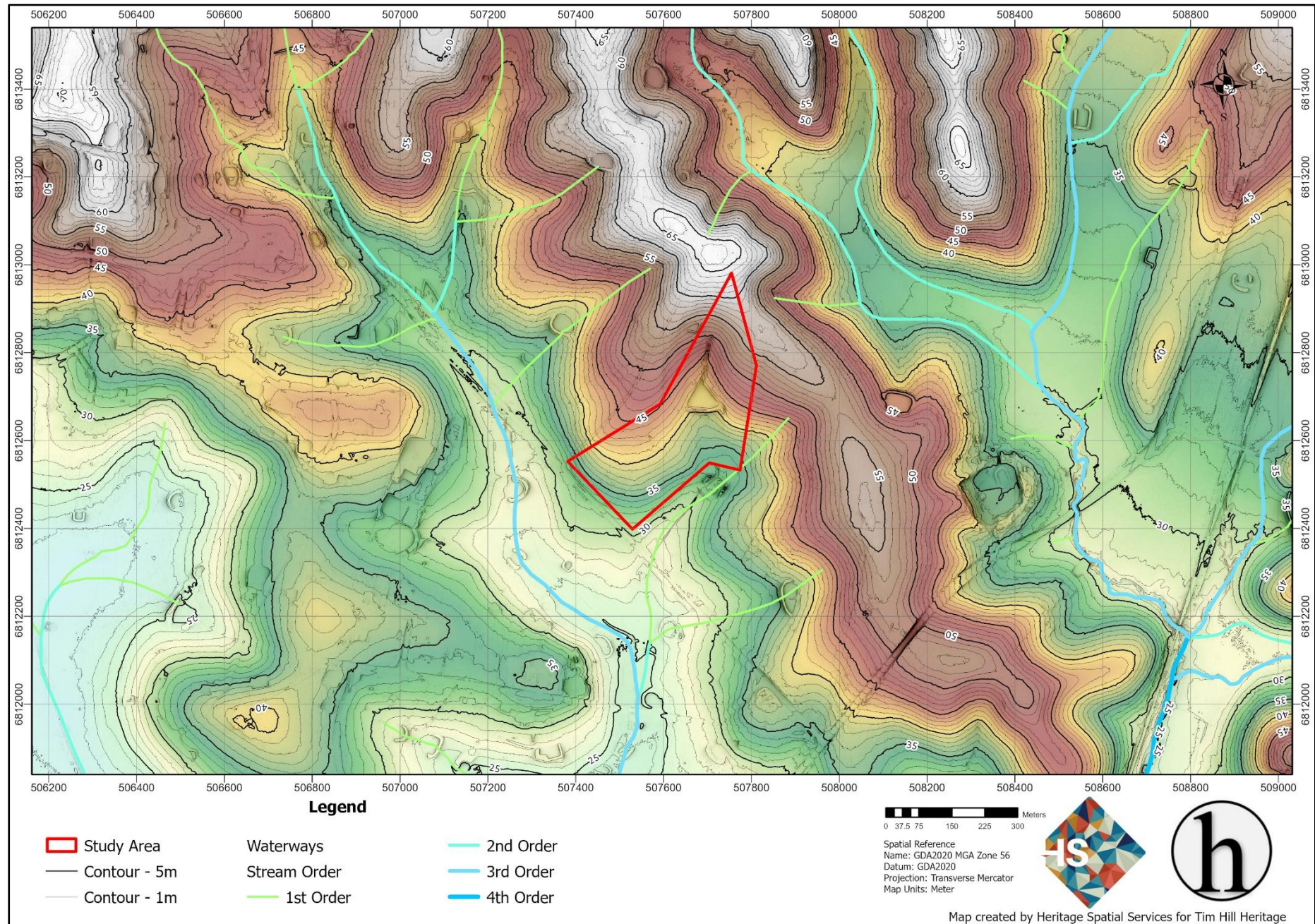


Figure 4: Topography and hydrology (source Six Maps)

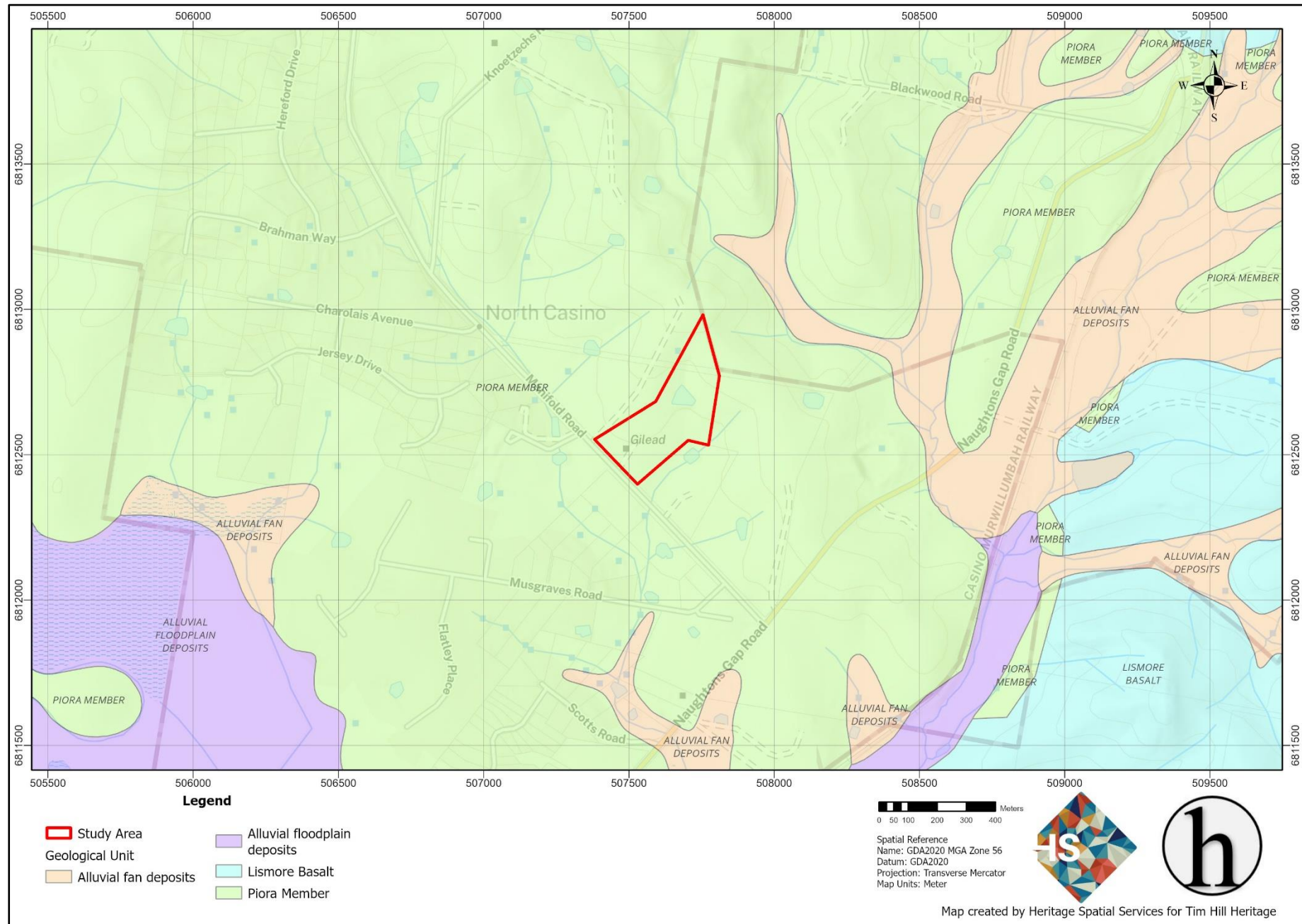


Figure 5: Geological map of Casino (source Geological Survey of NSW)

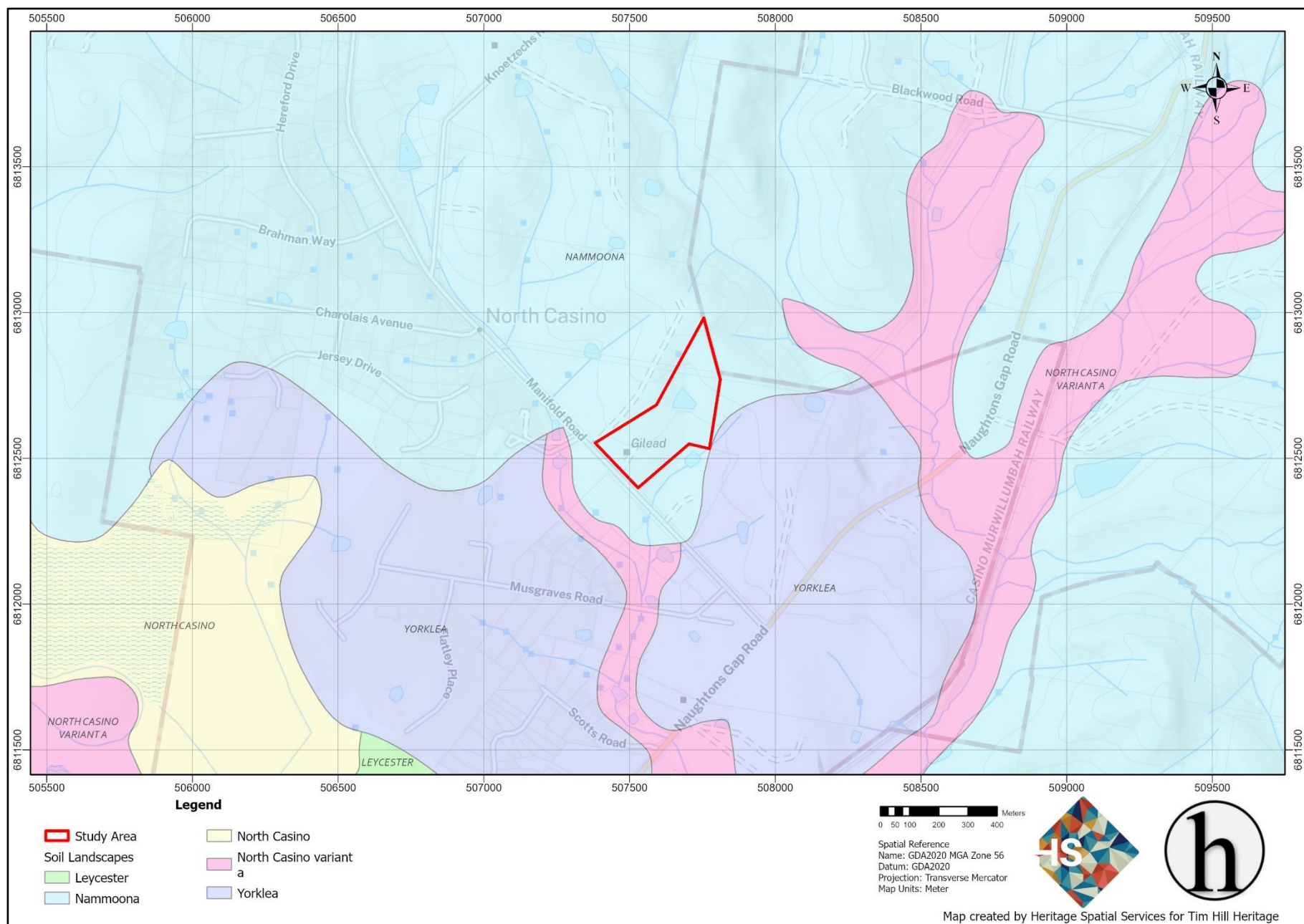
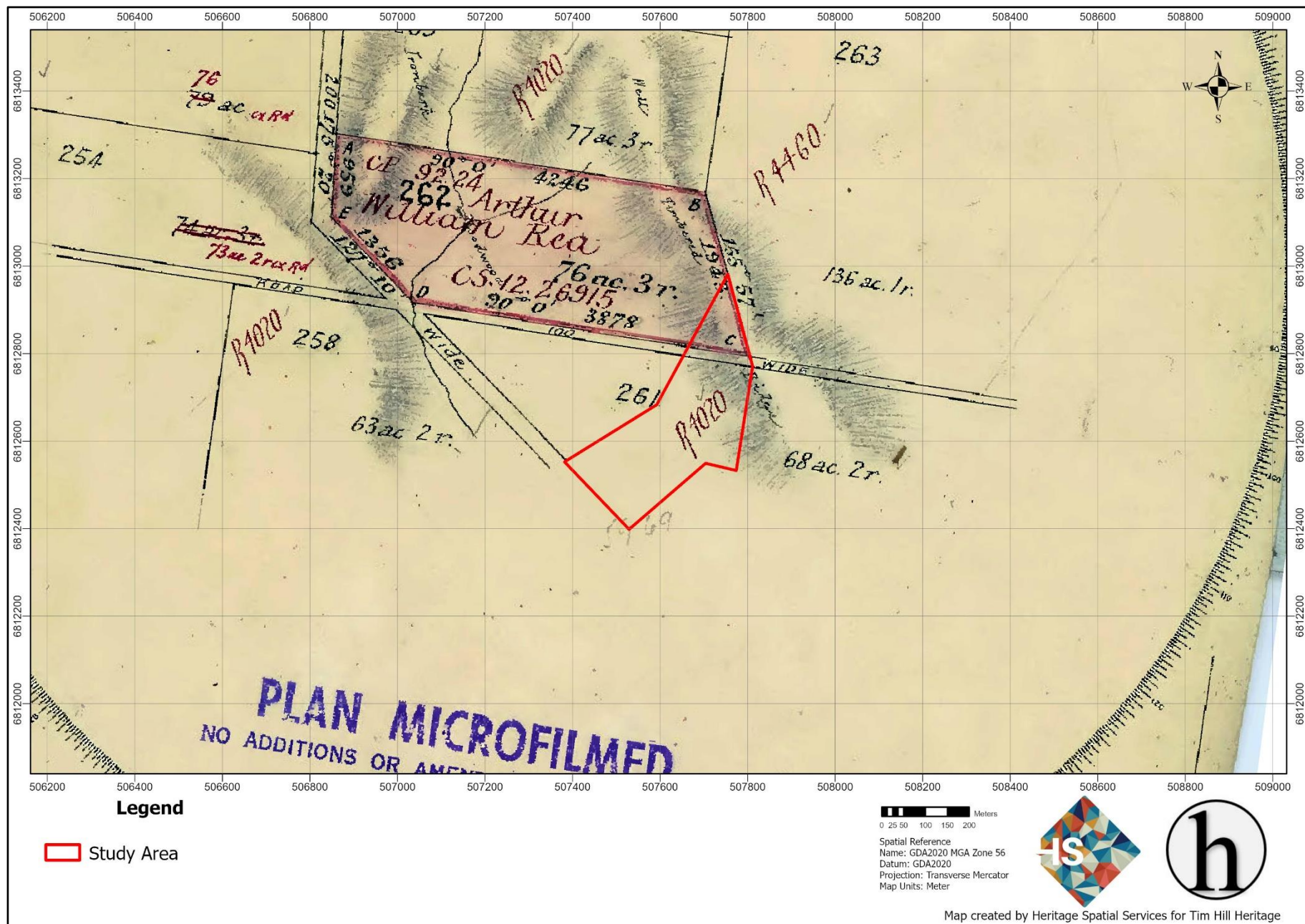


Figure 6: Soil landscape model (source: eSpade.nsw.gov.au)



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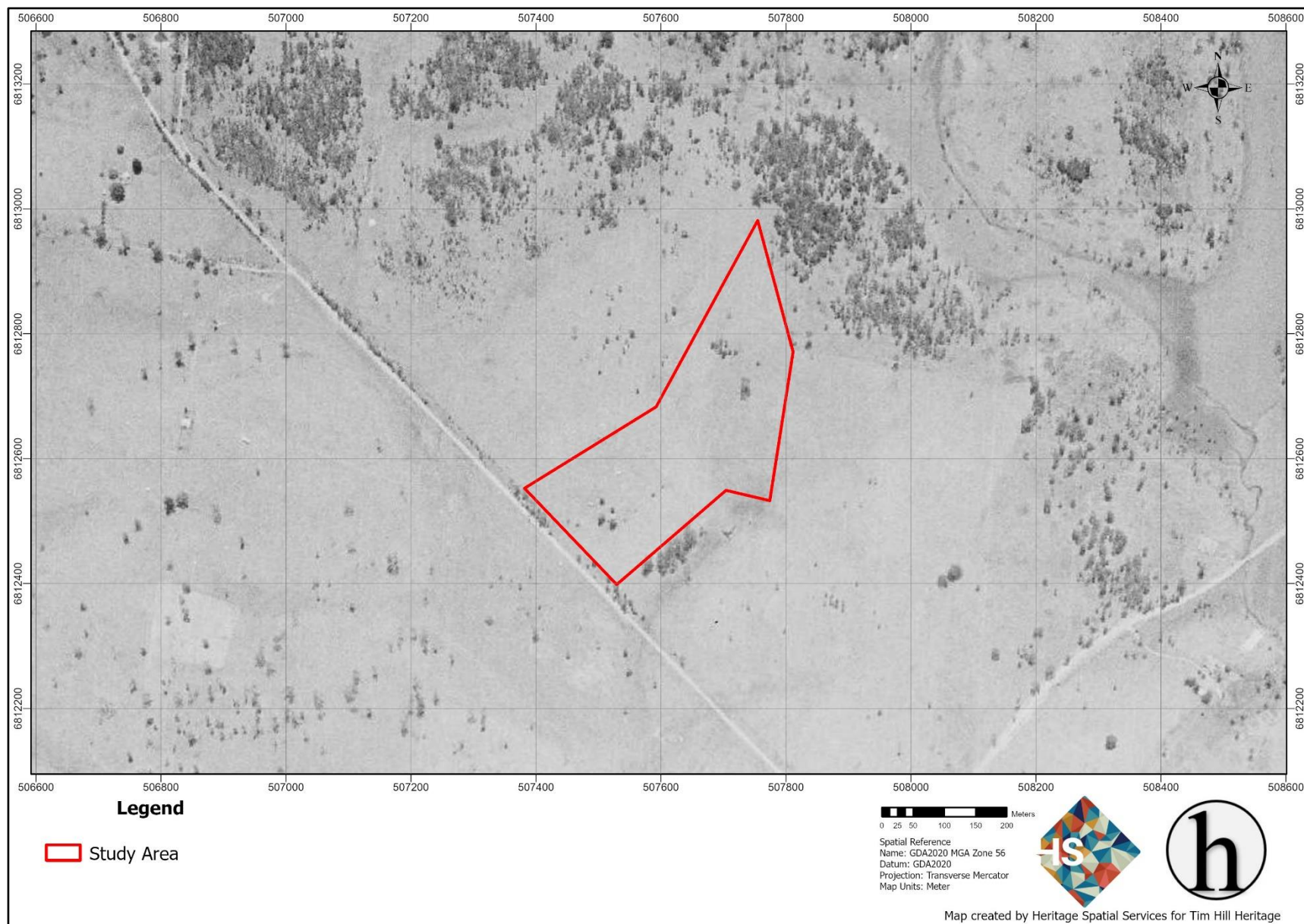


Figure 8: 70 Manifold Road- 1957 aerial photo



Figure 9: 70 Manifold Road- 1978 aerial photo



Figure 10: 70 Manifold Road- 1990 aerial photo

4 ARCHAEOLOGICAL SYNTHESIS AND PREDICTIONS

4.1 Aboriginal Heritage Information Management System (AHIMS)

The Aboriginal Heritage Information Management System (AHIMS) provides a list of previously recorded Aboriginal sites in NSW. A search of the AHIMS database is a condition of compliance with the CoPAI and provides information on the types of sites which will be located within and around the Study Area.

A search was undertaken on 18 October 2023 for the area “Lat, Long From : -28.8862, 152.9722 - Lat, Long To : -28.811, 153.0958.” (**Table 2** and **Figure 11**). No Aboriginal sites are recorded in or in close proximity to the Study Area.

The AHIMS search identified 31 previously recorded Aboriginal sites, of which the majority (39%/n=12) were Modified Trees (Carved or Scarred). Artefacts and Potential Archaeological Deposits were the next most common site type. The Aboriginal Ceremony and Dreaming site is understood to be a AHIMS record associated with the Casino Aboriginal Bora Ring (see section 4.3.1 below).

Table 2: Summary of AHIMS search results by site type (AHIMS #829977)

Site Type	No.	%
Aboriginal Ceremony and Dreaming, Ceremonial Ring (Stone or Earth)	1	3
Artefact	7	23
Artefact, Potential Archaeological Deposit (PAD)	3	10
Artefact, Aboriginal Resource and Gathering	1	3
Modified Tree (Carved or Scarred)	12	39
Potential Archaeological Deposit (PAD)	7	23
	31	100

Based on the AHIMS search the most likely sites to occur within the Study Area include Modified trees and stone artefact scatters.

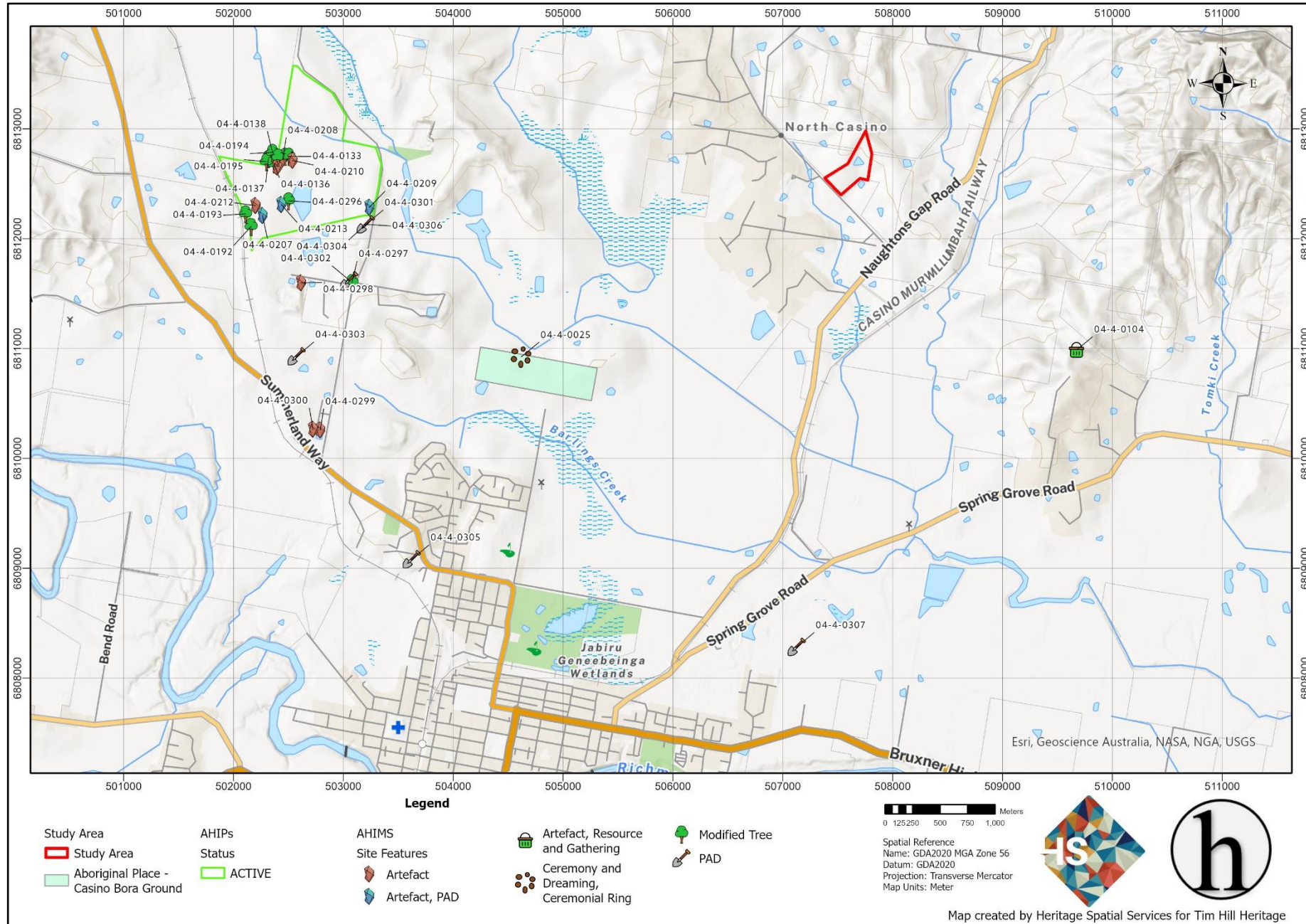


Figure 11: AHIMS search results (#829977)

4.2 Ethnohistory

4.2.1 *Observations of Aboriginal people on the Richmond River*

The Aboriginal people of the Casino area were part of a wider linguistic group, the Bundjalung which included about twenty dialects spoken between the Clarence and Logan Rivers extending west to Tenterfield (Crowley 1978:1). The concentration of Bundjalung dialects to the north compared to the fewer dialect groups of the adjoining southern Kumbainggiri led Crowley to suggest that the Bundjalung areas may have been colonised earlier than the Kumbainggiri allowing a greater number of dialects to develop. Crowley also suggested that coastal Bundjalung dialects varied significantly from inland Bundjalung dialects (Crowley 1991). Joshua Bray, a settler on the Tweed River travelled from the coast to the inland Bundjalung dialect country of the Upper Richmond and found that "The language of the Aborigines is sometimes completely different thirty miles away" (Bray 1899:193). The Casino area was occupied by people speaking the Galibal dialect. The Galibal dialect group occupied the area between the McPherson Range in the north, tributaries of the Richmond River (Shannon Brook & Mongogare Creek) to the south, the Richmond Range to the west and the Tweed and Mackellar Ranges to the east (Crowley 1978). Land belonged to clan groups whose boundaries had been established in mythology (Creamer and Godwin 1984). A group of families might make up a clan or 'horde' which was a land holding group occupying a distinct territory. These clan territories have been described on the coastal plain by Ainsworth (1922) on the lower Richmond and Bray (1901) for the coastal and upper Tweed Valley. A loose confederation of clan groups recognised a wider social and linguistic association. Tindale (1974) places the Galibal dialect group within the territory of the 'Badjalang' which included the greater part of the Clarence and Richmond River floodplains.

4.2.2 *Economy and resource-use*

The most detailed analysis of material culture has been that undertaken by McBryde (1978). The region of the Tweed, Richmond and Clarence Rivers would seem to form a distinct unit. This is particularly so in the case of fishing technology. The multi-pronged fishing spear and the shellfish hook are both absent from this region, and fish were caught in nets or speared in the shallows (McBryde 1978:187). Spears were single pointed fire hardened weapons (Dawson 1935:22), of both a lighter and heavier variety (Byrne 1946:3). The woomera or the spear throwing stick were not used in this region (Dawson *ibid*). The range of materials is considered wider than central Australian tribes, with fewer all-purpose items, few composite tools and a number of specialised ones. This may reflect a more sedentary lifestyle in a rich environment requiring fewer specialised tools (McBryde 1978:187). The stone tool element in the material culture was small and unspecialised. The archaeological evidence suggests changes to a simpler stone technology took place only centuries before European settlement. The stone tools in use immediately prior to European settlement, "... show little typological sophistication and did not demand highly skilled craftsmanship" (McBryde 1978:198).

The resources of sub-tropical rainforests were used extensively in the technology of the Richmond, which is heavily dependent on wood and bark fibre (McBryde 1978: 197). Rainforest timbers were used to

manufacture spears, a variety of clubs, shields, boomerangs and digging sticks. Bark was used for containers and shelter. Stone axes are referred to by Dawson (1935:22) and Byrne (1946:2). Fishing nets and rope was made from twine spun from the flame tree (Byrne *ibid*). Fishing nets were made a couple of yards long with a stick at each end. They were used individually or in combination with many of the same type (Seymour 1976:67). Bundock (1898) and Ainsworth (1922) describe the same type of nets used for game drives in rainforests and for cod fishing in summer. Descriptions of diet for inland groups emphasise terrestrial animal foods with little emphasis on vegetable foods. Bundock wrote of the Richmond River Aborigines "For game they had opossums, many varieties of kangaroo and wallaby, snakes, bandicoots, porcupine and flying foxes... birds... a good deal of fish in summer and large mussels" (Bundock 1898). The description would appear to include animals found in both rainforests and perhaps more open grasslands. Vegetable foods included a "... sort of bread from the beans of the Morton Bay chestnut and from the roots of the large arum (called by the Blacks congevois) (Bundock 1898). While congevoi is a rainforest plant the Moreton Bay chestnut is normally only found growing on watercourses.

4.2.3 Prehistory

The earliest occupation site for a riverine location comparable to the study area is the Seelands rock shelter on the Clarence River which contained an occupation phase from circa 4500 BC - 1600 AD (McBryde 1974b Table 1). The analysis of plant remains suggested a vegetation mosaic of open dry sclerophyll on elevated ground with corridors of rainforest along water courses (McBryde 1974:327). Analysis of faunal remains for the upper levels of the site indicated wallabies, possums and bandicoots provided the greater part of the meat diet (Wakefield in McBryde 1974: 360). Other animal remains included echidna, native cat, kangaroo, fruit bat, mussels, tortoise and catfish. McBryde noted a number of clear distinctions between the riverine Seelands site and the coastal midden at Wombah on the Clarence estuary. The Seelands artefact assemblage is more diverse, greater in quantity with strong evidence for the manufacture and maintenance of stone tools, minimal at Wombah. The biological material at Seelands reflects a broadbased economy exploitive of a number of microenvironments, in contrast to the narrow base at Wombah, shellfish. The archaeological evidence suggested contact between the riverine site and the estuary at both sites and evidence for winter occupation in the presence of emu eggshell at Seelands, while a dependence on oysters at Wombah would suggest occupation in late spring or summer (McBryde 1974b: 8-9).

4.3 Local archaeological studies

4.3.1 The Casino Bora Ring Aboriginal Place

The casino Bora Ring Aboriginal Place is a significant Aboriginal site located to the north of the Study Area, at the end of Barling Street. The following description of the site is provided in the Aboriginal Place Register (NSW Heritage Inventory):

Why is it an Aboriginal Place?

Casino Bora Ground is a sacred ceremonial (Bora) site where men's initiation ceremonies took place.

Why is it important to Aboriginal people?

Casino Bora Ground originally consisted of a large mud-walled ring connected by a narrow path to a smaller ring. The rings were almost perfect circles, and a large up-turned tree trunk stood in the centre of the larger ring.

The site for the Bora ground was carefully chosen because important ceremonies were held there. Bora grounds were generally situated near a camping ground large enough to accommodate all the tribes invited, and close to a river, creek or lagoon to provide sufficient water and food for all those attending the ceremonies.

It is likely that the rings at Casino Bora Ground were built and used between 1860 and 1890. W. Gill recorded that the rings looked relatively new when he saw them in 1906, and the geographer Griffith Taylor reported in *The Sydney Morning Herald* that the Bora Ground was still intact and well known to locals in 1924.

Casino Bora Ground is a sacred men's site because it was used for men's initiation ceremonies. Only Aboriginal men should visit the site. Aboriginal people believe that bad things will happen to anyone else who visits the site.

The following article in the *Casino and Kyogle Courier* from 1920 demonstrates the awareness of residents of the Bora Ring and efforts to preserve it as public land (*Casino and Kyogle Courier* Saturday 24 January 1920: 2)

CASINO'S BORA RING.

Gill reported to Tuesday 's meeting of the Casino Council that Mr. Harris had called on him and they, had paid a visit to the bora ring, three, miles out of town. Mr. Lamont, although not the owner, was in favor of having it protected. A suggestion was made that a certain area of private property be resumed as a park, and that an equal area be given from an unwanted road. The road was Of "lit-; tie use, and the exchange would get over the difficulty of taking away, a man's land, and at the same time would preserve an historical monument. He moved that. Mr. Hugh Wallace be written to and asked if he is willing' to assist the Council to effect an exchange. The-motion was carried.

4.3.2 Casino Freight Rail Terminal (Everick Heritage Consultants 2009, 2014)

Everick Heritage completed archaeological investigations at the 'Nammoona Summerdowns' Rail Terminal project located to the north of the Northern Rivers Livestock Exchange site at Reynolds Road, North Casino. The study identified many of the Aboriginal modified trees which were part of the AHIMS search and made a correlation between the distribution of archaeological sites and historic ground disturbance. The studies made the following general predictions (Everick heritage Consultants 2009, 2024):

- Artefact deposits may include stone artefacts and shell midden located on elevated ground around wetlands, creek and rivers

- Due to the predominance of sedimentary rock material in the Casino area quarry sites are considered unlikely to occur around Casino, however there may be axe grinding stones where suitable sandstone outcrops, and
- Culturally modified trees may occur in areas of old growth forests.

Archaeological test excavations were undertaken to determine the nature and extent of archaeological sites within the topsoils and artefacts were identified on all landforms (hillcrest, hill slope and lower slope/fringing wetland) with hillcrests having the higher proportion of stone artefacts. The analysis of the artefacts indicated that the stone tools were relatively high modified, or reduced, which was interpreted as evidence of raw material rationing. This occurs where suitable stone material for tool production is not readily available and tools are either used repeatedly to extend their life. This includes 'retouching' the tool edge when it becomes blunt, which is common on tools produced from fine grained sedimentary stone material.

The Everick heritage Consultant studies were undertaken on the low hills to the south of a very large water body in the upper catchment of Barlings Creek. The sites are also directly west of the North Casino Bora Ring which may have additionally contributed to the specific uses of the sites and surrounding landscape.

4.3.3 Casino Industrial Rezoning (Everick Heritage Consultants 2019)

Everick Heritage Consultants (2019) undertook an archaeological Due Diligence assessment of the proposed industrial rezoning proposal to the east of Casino, on the Bruxner Highway. The Study Area included low-lying floodplain and concluded that the proposed rezoning would not likely impact on Aboriginal sites. The study additionally includes consultation with Casino Boolangle Local Aboriginal Land Council which did not identify any historic or ceremonial sites.

4.3.4 Casino Wastewater Treatment Facility (Everick Heritage Consultants 2012)

The assessment north-west of Casino was of a range of wastewater treatment infrastructure, including for the installation of pipes, treatment tanks and irrigation works. No aboriginal objects or places were identified in this assessment (Robins et al 2012). Ground surface visibility was poor to fair, with most of the subject lands being highly disturbed. During the assessment an artefact scatter also containing hearth stones was located on slopes to the Richmond River. This site comprised a low-density artefact scatter on a river terrace located approximately 30m west of the Richmond River. The floodplain at the base of the slope was, before it was drained, an extensive area of wetland (. The site was thus located on relatively high ground between the Richmond River and the wetlands at the base of the hill. The site comprised approximately nine artefacts, a river pebble and a number of hearth fragments. The artefacts comprised one silcrete core, one silcrete micro-core, one silcrete retouched flake, two silcrete flakes, a silcrete pebble, and a chalcedony micro-core. Scattered amongst the artefacts were numerous small fragments (maximum size c. 7 cm) of orange clay hearthstone fragments.

The site significance assessment concluded:

This site, though small and disturbed, is an interesting one. Few archaeological sites have been recorded near the river in this locality, although it is a logical place for site location. It is close to

permanent water and a range of resources from a number of different resources. The raw materials are diverse and from different localities. The chalcedony possibly comes from further east where sources of this material have been recorded. The silcrete is not local and possibly comes from the ranges to the north. Clay heat retainers are also not a common feature of sites in the region (Robins et al 2012:77-79).

4.4 Regional archaeological studies

4.4.1 *McBryde (1974) and Coleman (1982)*

McBryde (1974) proposes that groups ranged between the seacoast and foothills of the coastal ranges on a seasonal basis (i.e. McBryde 1974) utilising the immediate coast and main rivers as the focus of occupation. Early sources support this view to some extent as there are records describing the movement of inland groups of the Clarence River to the coast during winter. Coleman (1982) proposes an alternate model where it is suggested that movement of coastal people was not frequent, and that semi sedentary groups moved north and south within the coastal plain rather than to the upper rivers (Coleman 1982). The model is based on reports of numbers of small villages composed of dome shaped weatherproof huts between the mid- NSW coast and Moreton Bay. Flinders described a small group of huts in the vicinity of Yamba in 1799, and Perry described two villages on the banks of the lower Clarence in 1839 (McBryde 1974:9). Similar sightings were reported by Rous on the Richmond (McBryde 1974), Oxley on the Tweed (Piper 1976) and in Moreton Bay (Hall 1982). The 'solid' construction methods described for these huts seem to suggest the occupation of a base camp for periods of months rather than a constant wide-ranging pattern of low-level land use.

Byrne (1987)

Denis Byrne was engaged by the Forestry Commission of NSW to undertake a review of ethnohistorical and archaeological records relating to the use of rainforests in NSW (Byrne 1987). This was the first major synthesis of records relating to rainforests in northern NSW and is directly relevant to the Study as Casino is located around the western edge of the Big Scrub rainforests which dominate the volcanic plateaus around Lismore, Wollongbar and Mullumbimby.

“The lowland rainforests were situated within what might be termed the core areas of the coastal lowland tribes...the foci of settlement of these tribes were the immediate coastal strip, the estuaries and valleys of the major rivers. The key attribute of the lowland rainforests was their proximity to the main areas of settlement, and, hence, the accessibility or casually, could be easily scheduled within the mainstream economy.

Most of these rainforests could be exploited from bases in other and neighbouring environments. It is likely that the major campsites were located close to the productive margins of these rainforests. Campsites may also have been situated in clearings within rainforests where they acted as bases for the exploitation of core areas of extensive forests and as staging camps for travel through such forests (Byrne 1987:54-55).

The report makes the following conclusions from the case-study at Nullum State Forest to the north-east of Casino (Byrne 1987:71)

The evidence of the sites in Nullum S.F. indicate that Aborigines (sic.) were operating in areas where rainforest occupies many of the gullies. The open sites are along the hardwood ridges. It is suggested that the gully rainforests were exploited from these sites but it is stressed that the rainforests were only part of a mosaic of forest types surrounding the sites all of which offered resources to the Aborigines (sic). These sites cannot, therefore, be regarded as 'rainforest sites'.

However, the Byrne report (197:98) makes an important note on the relationship between rainforests and sacred/ significant sites from which had implications for the low-lying river country and woody hills of the river valleys:

By way of a conclusion, it may be said that the rainforests of New South Wales, particularly those on the Far North Coast, have a relatively high incidence of sacred/significant sites, which consisted of natural landscape features. In the far North Coast there is a tendency for these sites to be concentrated in rainforest environments: of the 34 sites of this type in a rough rectangle between Tweed Head, Ballina, Tabulam, and Woodenbong 15 are in rainforest contexts and a further three are on land likely to have formerly have been rainforest. It might also be stressed that three of the sacred/ significant mountain sites are held by Aborigines (sic) in the areas where they are known to be most important, if not the most important, sacred sites known to them...

If this model was applied to the Study Area it is reasonable to conclude that the Study Area, being open forest along the main river, would have an elevated potential as an Aboriginal campsite and a reduced potential to be a sacred/ significant site.

4.4.2 Godwin (1999)

Godwin (1999a and 1999b) argues that the 'models' proposed by McBryde and Coleman are not supported by the archaeological record and that local conditions dictated exploitation strategies on the north coast of NSW. In this model:

Sub-coastal groups journeyed to the coast, but only in small numbers: there was not the large-scale migration of people posited by McBryde. The data suggests that this took place throughout the year and could have been for both ritual and secular reasons. Groups also journeyed through the "Falls" country throughout the year. There are also reports of movement in a north-south direction along the sub-coastal strip from river valley to river valley, and from the sub-coastal zone to the tablelands which appears to have been associated with ceremonial gatherings. These ranged from clan-sized gatherings through to inter-tribal meetings (Godwin 1999:123).

If this model was applied to the Study Area, it is reasonable to conclude that the main campsites were located towards the coast and that the Aboriginal use of the subcoastal and up-river areas would be at lower population densities with relatively high mobility.

4.4.3 *Regional Forest Archaeological Assessment (Hall and Lomax 1998)*

Hall and Lomax (1998) undertook a major review of archaeological assessments undertaken across NSW as part of the NSW Forestry Corporation assessments for logging operations. The Study reviewed and summarised data which included hundreds of recorded Aboriginal sites in forest environments which had generally not been subject to significant ground disturbance when compared to urban and agricultural landscapes. The study makes the following comment on the relationship between site size and diversity and the inferred function of archaeological sites across forest environments:

Archaeological evidence in the form of stone artefact scatters is present in all forest types and in many if not most areas occurs more or less continuously across the landscape. Data from recent regional scale archaeological studies that employed similar survey methodologies across a range of diverse forest types including coastal, sub-tropical and subalpine forested areas are presented in Table 1. The data show that on average approximately one to three artefact occurrences can be expected to occur for each linear kilometre of forest environment regardless of type. The term artefact occurrence refers to one or more stone artefacts at least 100 m from the next artefact. A range of stone artefact site types has been located during forest surveys. In the broadest possible sense these sites can be characterised as ranging from small simple sites 2451, Australia. to larger and more diverse sites...with increasing site diversity roughly corresponding to the stone artefact occurrence...The larger and more diverse sites generally represent occupation sites. These are sites that would have had a generalised function and where a range of activities were carried out. Large but less diverse sites are more likely to represent locations where specific activities were undertaken such as quarry or primary reduction sites where stone raw materials were principally worked. Smaller sites of low diversity represent the debris from activities away from main occupation sites...(Hall and Lomax 1998:35-36).

The study makes additional comments on the relationship between sites and landforms, particularly proximity to water and ridges crests/ spurs:

Analysis indicated that there was a high positive correlation between site location and ridgelines in some land systems but not in others. Further analysis indicated that one of the major factors determining the strength of this correlation would appear to be fairly subtle differences in the level of constraint imposed on human movement by terrain. For example, in hilly areas of low relief there was not the same constraint to use ridge tops for pathways as there was in areas of high relief.

...there is a much higher positive correlation between site location and ridges for the ranges land system than for the lowland hills land system. Other factors which are likely to have influenced this positive correlation is the relative abundance of stone artefact raw materials in high relief means relative to areas of low relief where artefact raw materials are less common (Hall and Lomax 1998:37-38).

The relatively open and broad nature of the ridge crest would, if this model is correct, reduce the potential that the Study Area was an open campsite or major occupation area.

4.4.4 Predictive model for the Study Area

The following landscape features are influential in the distribution of Aboriginal archaeological sites on the NSW North Coast:

- elevated ridges and ridge crests where the forest is more open and soils are free draining
- elevated landforms which provide access to a range of physical/ environmental resources
- lands which have not been exposed to repeated and/or significant disturbance
- areas in the vicinity of sacred/ significant cultural sites, and
- areas around the periphery of the lowland rainforests.

As a general pattern of use spurs and ridgelines above the water line would have formed the main areas of occupation. Secondary creeks and adjacent ranges would have been utilized as traditional pathways, however the archaeological signature of this type of use typically comprises isolated artefacts and low-density stone artefact scatters. The archaeological signature of the river/floodplain is typically associated with hunting and gathering and includes low density artefact scatters, isolated artefacts and scarred trees. Archaeological sites associated with consumption of foods, such as hearths and middens, rarely survive in soils subject to flooding and intensive agriculture.

The following specific comments are provided to inform the ACHA:

- the Study Area is not located on the banks of the Richmond River or an attached lagoon or swampland formed in a paleochannel of the river which would have increased local resource diversity
- the Study Area is located south of a large and expansive ridge crest north of the Richmond River floodplain - the portion of the Study Area which is in closest proximity to the ridge crest is identified as part of proposed Lot 5 in lands identified as 'bushfire prone land' which will not be developed
- the Casino Bora Ring is located to the southwest of the Study Area- the Study Area may have been used for hunting and collection associated with this significant site but would not likely have been used as part of ceremonial activities directly associated with the Bora, and
- the Study Area is located in an area which has been subject to significant historic ground disturbance which has removed most of the topsoils and all original forests, mostly as a result of erosion.

As such it is considered that there is a low potential that the Study Area will contain Aboriginal archaeological sites.

5 FIELD SURVEY: ABORIGINAL CULTURAL HERITAGE

5.1 Consultation with Casino Boolangle LALC

The Study Area is west of the Widjabul Wia-Bal native Title Determination Area and east of the Western Bundjalung Native Title Determination Area.

The following summarises the consultation with Casino Boolangle LALC to support the ACHA:

- 19th October 2023- a email notification was issued via email
- 19th October- a phone call was undertaken with Ms Joanne Bolt, CEO, to confirm the email was received and that the date was suitable.
- 27th October- a phone call was undertaken with Ms Joanne Bolt, CEO, to confirm the site inspection and contact details for the Aboriginal sites officer, and
- 27th October- a calendar invitation/ placeholder was issued to Joanne to confirm the site inspection.

The site inspection was undertaken on 31 October 2023 with Senior Aboriginal sites officer Mr Bruce Caldwell.

5.2 Pedestrian survey

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 materials and is a requirement of the CoPAI (DEECW 2010A). For the Study Area this included (**Figure 12- Figure 16**):

- Clearing of all native forests
- Construction of the primary dwelling at least prior to the 1950s
- Construction of a dam in the 1960's 1970s, and
- Cropping in the lower paddocks near Manifold Road.

Table 3 presents information on the extent to which survey data provides sufficient evidence for an evaluation of the extent and nature of disturbance across the area and the potential of identifying archaeological materials should they occur. Based on the calculation of survey coverage it is reasonable to proceed on the basis that the archaeological survey was constrained by grass cover and gravel from access tracks and laydown areas.

Table 3: Calculation of survey coverage/ effectiveness by Survey Unit

Survey Unit (SU)	Landform	Survey Area (m ²)	Visibility	Exposure	Effective coverage area (m ²)	Effective coverage %	No. of sites
1	Ridge	2340	40	20	187	8	0
2	Mid slope	2360	40	20	188	8	0
3	Lower slope	2720	20	10	55	2	0
4	Lower slope	1200	20	10	24	2	0

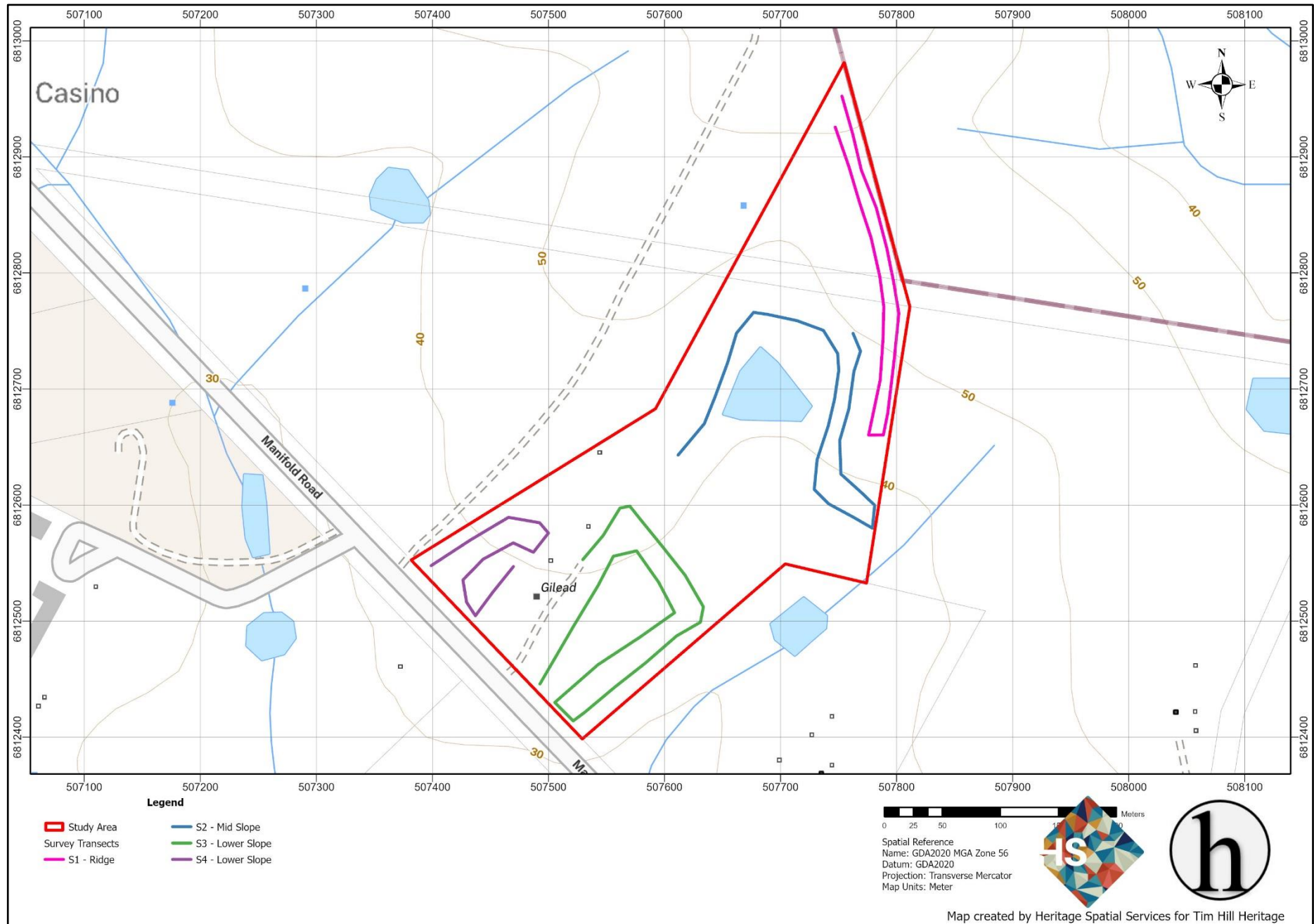


Figure 12: Location of survey transects



Figure 13: Looking west from the ridge crest across the middle slopes to the farmhouse



Figure 14: Example of good ground visibility under a large fig tree



Figure 15: Inspection of the middle slopes near the old dam.



Figure 16: The edge of the ridge crest looking north-west to the top of the ridge

5.3 Survey Results

For the purposes of the ACHA the following describe the outcomes of the archaeological investigations of the Study Area to inform the cultural heritage impact assessment:

- the archaeological survey comprised a pedestrian transect across of sample of the Study Area
- the Study Area was identified to be significantly disturbed, mostly from the ongoing tilling and land clearing from previous beef production, and
- the ground surface visibility was generally good due to the drought- however there were very few intact soil profiles as the soils have been recently worked with a large machine to open up the paddocks.

Having consideration for the outcomes of the desktop assessment, including the statements of the predictive model, and the outcomes of the site inspection which have demonstrated that the Study Area has been subject to significant soil disturbance which has removed and displaced topsoils it is not considered likely that the Project will impact on Aboriginal archaeological sites.

The following comments are provided to inform the requirement for archaeological test excavation as outlined by the CoPAI:

- the site inspection has demonstrated that the Project footprint has been subject to significant ground disturbance from agriculture and soil erosion
- the predictive model did not identify a high likelihood that the Study Area would contain Aboriginal archaeological sites (scarred tree and stone artefact scatters), and
- there are no recorded sites of scared or spiritual significance noted on the AHIMS site register or likely to occur within the Study Area due to the history of ground disturbance.

The primary observation of the site inspection was that the elevated and dry forests that existed prior to land clearing where marginal hunting grounds when compared to the lower slopes and wetlands around Whites Lagoon and the Richmond Valley which would have offered a diversity of food resources - the main campsites are expected to be fringing the paleochannel on elevated terminating spurs and ridges.

5.4 Requirement for archaeological test excavation

The results of the archaeological survey are within the range of 'normal' for archaeological investigations on the NSW north coast where the ability to identify sites closely correlates with landforms, the amount of grass cover and the extent of disturbance to topsoils. Archaeological test excavation in the Casino and upper Richmond Valley have demonstrated that topsoils do contain Aboriginal artefacts which are consistent with the manufacture and maintenance of hunting tools. However, the nature of the landform being a broad ridge in relatively open country, the distance from the river and the history of ground disturbance means that there is not a high probability that the Study Area will contain stone artefacts. Stone artefacts, if they occurred, would typically be classified as 'isolated artefacts' and result from the discard of tools and waste material during hunting activities. Additionally, in northern NSW, sites which are

considered to have 'conservation value' include, for example, bora/ stone arrangement sites, modified trees, rock art, historic sites associated with former Aboriginal reserves and missions and Aboriginal burials. Stone artefact scatters are relatively common and would not be considered to be of high conservation value. As such, the requirements for archaeological excavation as defined by the CoPAI do not exist within the Study Area.

5.5 Cultural Values of the Study Area

The following summarises the observations and comments from Brice relating to the cultural landscape values of the Study Area:

- The primary cultural site within North Casino is the North Casino Bora Ring- this was noted as one of the most significant Bora Rings for Bundjalung people
- the country was dry at the time of the inspection and it was agreed that it would be marginal hunting country- it would have been used for marsupials and larger animals, but the best hunting ground were down around the river flats and wetters areas along the river for birds, fish and turtles, and
- the land had been significantly disturbed by farmers- it was noted that farming and cows had made a significant impact on the cultural landscape and that Aboriginal people were moved off the hunting grounds when farmers settled.

Bruce did not raise any specific objections to the proposal for rural residential development within the Study Area and did not raise any broader concerns about rural residential development generally in the upper Richmond River valley.

5.6 Assessment of Harm

5.6.1 *Likely impacts*

The following activities would reasonably result from the future residential subdivision of the Study Area (see **Figure 3**):

- Excavation of the main access road from Manifold Road including drains and water diversions as required
- installation of mains power
- Excavation of pads for building envelopes which would require cut and fill earthworks
- Installation of onsite waste water treatment, including tanks and evaporative trenches, and
- Construction of ancillary structures including sheds, pools and gardens.

5.6.2 *Impact Avoidance and Assessment*

The following statements are provided to inform the Impact Assessment and outline measures to avoid or mitigate the consequences of harm.

- the there is an overall low likelihood that the Study Area contain stone artefact scatters associated with traditional Aboriginal campsites,

- there are no old growth trees and none of the mature trees have evidence of anthropogenic modification, and
- as the proposal involves rural residential development any future development is not constrained and there will be sufficient space within each Lot to manage Aboriginal archaeological sites through relocation and storage within small exclusion areas.

6 MANAGEMENT RECOMMENDATIONS

The ACHA has concluded that the future development of the Study Area as a rural residential housing area will not likely result in harm to Aboriginal objects and there is no additional requirement for archaeological excavation or consultation with the wider Aboriginal community. As such the works can proceed without an AHIP in accordance with the Due Diligence defense provisions (section 87(2)). Mitigation and management recommendations primarily relate to unexpected finds and Aboriginal skeletal remains.

6.1.1 Recommendation 1: Aboriginal Objects Find Procedure

It is recommended that if it is suspected that Aboriginal objects have been uncovered as a result of ground disturbance within the Study Area:

- a) work in the surrounding area is to stop immediately and records are made of the finds via project reporting procedures
- b) a temporary fence is to be erected around the site and appropriate controls put in place to ensure that no additional ground disturbance happens in the vicinity of the find
- c) an appropriately qualified archaeological consultant and a representative of the Casino Boolangle Local Aboriginal Land Council are to be engaged to identify the material and provide an initial assessment of the significance of the object and the likely nature and extent of any associated archaeological sites
- d) if the material is found to be of Aboriginal origin, the find must be reported on the AHIMS database
- e) In the event that the Aboriginal objects are considered to have been damaged or disturbed, the incident must be reported through the NSW Enviro Hotline, and
- f) works may only recommence after advice from Heritage NSW on the requirement for an AHIP or where design, engineering or construction measures are identified to mitigate further damage to the Aboriginal site (i.e. site avoidance).

6.1.2 Recommendation 2: Aboriginal Human Remains

It is unlikely that human remains will be located at any stage during ground works within the Project Area. However, should this event arise, all works must halt in the immediate area to prevent any further impacts to the remains. The burial site should be cordoned off and the remains themselves should be left untouched. The nearest police local area command (Casino), Casino Boolangle LALC and Heritage NSW (Parramatta) 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 Heritage NSW should be consulted as to how the remains should be dealt with. Work may only resume after agreement is reached between all parties, provided it is in accordance with all parties' statutory obligations.

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1957 aerial photo

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1966 aerial photo

<https://portal.spatial.nsw.gov.au/download/historic/1516/1516_08_106.jp2.jpeg>

1986 aerial photo

<https://portal.spatial.nsw.gov.au/download/historic/3584/3584_06_243.jp2.jpeg>

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APPENDIX A: AHIMS EXTENSIVE SEARCH RESULTS

<div>AHIMS Web Services (AWS) Extensive search - Site list report</div> <div>Your Ref/PO Number : 70 Manifold Road Client Service ID : 829977</div>										
SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
04-4-0207	CRFT 01	GDA	56	502263	6812210	Open site	Valid	Artefact : -, Potential Archaeological Deposit (PAD) : -		
<u>Contact</u>		<u>Recorders</u>		Mr.Tim Robins						
04-4-0138	Casino, Dargaville Scarred Tree.6	GDA	56	502355	6812783	Open site	Not a Site	Modified Tree (Carved or Scarred) : 1	3726	
<u>Contact</u>		<u>Recorders</u>		Mr.Ashley Moran						
04-4-0301	RVRJP PAD 01	GDA	56	503205	6812129	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
<u>Contact</u>		<u>Recorders</u>		ERM Australia Pty Ltd- Sydney CBD,Ms.Lorien Perchard						
04-4-0297	RVRJP CMT 02	GDA	56	503078	6811600	Open site	Valid	Modified Tree (Carved or Scarred) : -		
<u>Contact</u>		<u>Recorders</u>		ERM Australia Pty Ltd- Sydney CBD,Ms.Lorien Perchard						
04-4-0212	CRTF05	GDA	56	502200	6812300	Open site	Valid	Artefact : -		
<u>Contact</u>		<u>Recorders</u>		Mr.Tim Robins						
04-4-0208	CRFT03	GDA	56	502447	6812725	Open site	Valid	Artefact : -	3726	
<u>Contact</u>		<u>Recorders</u>		Mr.Tim Robins						
04-4-0299	RVRJP IF 01	GDA	56	502789	6810257	Open site	Destroyed	Artefact : -		
<u>Contact</u>		<u>Recorders</u>		ERM - Melbourne,ERM Australia Pty Ltd- Sydney CBD,Ms.Alyce Haast,Ms.Lorien Pe						
04-4-0192	NAMMOONA 1	GDA	56	502160	6812110	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
<u>Contact</u>		<u>Recorders</u>		Mr.Adrian Piper						
04-4-0137	Casino, Dargaville Scarred Tree.5	GDA	56	502317	6812730	Open site	Not a Site	Modified Tree (Carved or Scarred) : 1		
<u>Contact</u>		<u>Recorders</u>		Mr.Ashley Moran						
04-4-0134	Casino, Dargaville Scarred Tree.2	GDA	56	502469	6812749	Open site	Not a Site	Modified Tree (Carved or Scarred) : 1		
<u>Contact</u>		<u>Recorders</u>		Mr.Ashley Moran						
04-4-0296	RVRJP CMT 01	GDA	56	502500	6812343	Open site	Valid	Modified Tree (Carved or Scarred) : -		
<u>Contact</u>		<u>Recorders</u>		ERM Australia Pty Ltd- Sydney CBD,Ms.Lorien Perchard						
04-4-0133	Casino, Dargaville Scarred Tree.1	GDA	56	502504	6812749	Open site	Not a Site	Modified Tree (Carved or Scarred) : 1		
<hr/>										
Report generated by AHIMS Web Service on 18/10/2023 for Tim Hill for the following area at Lat, Long From : -28.8555, 152.9876 - Lat, Long To : -28.7803, 153.1111. Number of Aboriginal sites and Aboriginal objects found is 31										
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										Page 1 of 3



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 70 Manifold Road

Client Service ID : 829977

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
	Contact Mr.Bill Walker	Recorders	Mr.Ashley Moran					Permits		
04-4-0307	RVRJP PAD 07	GDA	56	507127	6808282	Open site	Not a Site	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	ERM Australia Pty Ltd- Sydney CBD,ERM Australia Pty Ltd- Sydney CBD,Ms.Lorien					Permits		
04-4-0209	CRFT 02	GDA	56	503236	6812284	Open site	Valid	Artefact : -, Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	Mr.Tim Robins					Permits	3726	
04-4-0136	Casino, Dargaville Scarred Tree.4	GDA	56	502371	6812680	Open site	Not a Site	Modified Tree (Carved or Scarred) : 1		
	Contact Boolangle LALC	Recorders	Mr.Ashley Moran					Permits		
04-4-0214	CRFT06	GDA	56	502397	6812650	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Tim Robins					Permits	3726	
04-4-0210	CRFT04	GDA	56	502537	6812711	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Tim Robins					Permits	3726	
04-4-0298	RVRJP AS 01	GDA	56	502614	6811597	Open site	Valid	Artefact : -		
	Contact	Recorders	ERM Australia Pty Ltd- Sydney CBD,Ms.Lorien Perchard					Permits		
04-4-0025	Casino Bora Ground	AGD	56	504515	6810737	Open site	Valid	Aboriginal Ceremony and Dreaming : -, Ceremonial Ring (Stone or Earth) : -	Aboriginal Place,Bora/Ceremonial	1511,102557
	Contact	Recorders	Ray Kelly,Isabel McBryde					Permits		
04-4-0104	Spring Grove 1	AGD	56	509570	6810800	Open site	Valid	Artefact : 2, Aboriginal Resource and Gathering : -		99152,102557
	Contact T Russell	Recorders	Mr.Adrian Piper					Permits		
04-4-0302	RVRJP PAD 02	GDA	56	503054	6811621	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	ERM Australia Pty Ltd- Sydney CBD,Ms.Lorien Perchard					Permits		
04-4-0193	NAMMOONA 2	GDA	56	502110	6812225	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
	Contact	Recorders	Mr.Adrian Piper					Permits		
04-4-0195	NAMMOONA 4 NAMMOONA 5	GDA	56	502300	6812700	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
	Contact	Recorders	Mr.Adrian Piper					Permits		

Report generated by AHIMS Web Service on 18/10/2023 for Tim Hill for the following area at Lat, Long From : -28.8555, 152.9876 - Lat, Long To : -28.7803, 153.1111. Number of Aboriginal sites and Aboriginal objects found is 31

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 70 Manifold Road

Client Service ID : 829977

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
04-4-0194	NAMMOONA 3	GDA	56	502355	6812784	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
	Contact							Permits		
04-4-0213	CRFT 07	GDA	56	502435	6812310	Open site	Valid	Artefact : -, Potential Archaeological Deposit (PAD) : -		
	Contact							Permits		
04-4-0303	RVRJP PAD 03	GDA	56	502575	6810928	Open site	Not a Site	Potential Archaeological Deposit (PAD) : -		
	Contact							Permits		
04-4-0300	RVRJP AS 02	GDA	56	502723	6810264	Open site	Valid	Artefact : -		
	Contact							Permits		
04-4-0304	RVRJP PAD 04	GDA	56	503205	6812129	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact							Permits		
04-4-0305	RVRJP PAD 05	GDA	56	503623	6809080	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact							Permits		
04-4-0135	Casino, Dargaville Scarred Tree.3	GDA	56	502405	6812741	Open site	Not a Site	Modified Tree (Carved or Scarred) : 1		
	Contact Boolangle LALC							Permits		
04-4-0306	RVRJP PAD 06	GDA	56	503205	6812129	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact							Permits		

** Site Status

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

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

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

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

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Page 3 of 3



APPENDIX B: CONSULTATION WITH CASINO BOOLANGLE LALC

19th October 2023 Notification of the assessment

From: timhill.heritage@gmail.com <timhill.heritage@gmail.com>

Sent: Thursday, October 19, 2023 9:39 AM

To: 'CEO CBLALC' <ceo@cblalc.com.au>

Subject: 70 Manifold road North Casino- Residential subdivision

Good morning Joanne

I have been engaged to undertake a ACHA study for a proposed rural residential subdivision at 70 Manifold Road, North Casino. Please see attached the study location, AHIMS site information (map and report)

I have arranged access for the site inspection between 12 and 2pm on Monday 30 October 2023. Can you please confirm that Casino Boolangle will have a Aboriginal sites officer available?

Please give me a call if you have any additional questions.

Tim Hill

Heritage Management & Planning

0473033615

27th October 2023- Calendar placeholder for site meeting

The screenshot shows a Microsoft Outlook window with the 'Manifold Road Site Inspection - Meeting' tab selected. The meeting details are as follows:

- Title:** Manifold Road Site Inspection
- Organizer:** timhill.heritage@gmail.com (Required: 'CEO CBLALC')
- Time:** Tuesday, 31 October 2023 12:00 PM-2:00 PM
- Location:** 70 Manifold Road North Casino
- Body:**

Hi Joanne
This is a placeholder for the site inspection of the residential subdivision at 70 & 90 Manifold Road

Ta

Tim Hill
0473033615

The interface includes standard Outlook controls like 'Delete', 'Send to OneNote', 'Calendar', 'Quick Steps', 'Move', 'Rules', 'Mark Unread', 'Follow Up', 'Find', 'Related', 'Select', 'Read Aloud', and a response bar with 'Accept', 'Tentative', 'Decline', and 'Propose New Time' options.