

An aerial photograph of a rural landscape at sunset. The foreground is dominated by a large, dense forest of tall, thin trees. To the right, a calm body of water reflects the golden light of the setting sun. In the background, rolling green hills and a small cluster of houses are visible under a sky filled with soft, orange-tinted clouds.

NGH

Aboriginal Cultural Heritage Assessment

Bega Urban Land Release Planning Proposal

May 2025

Bega Valley Shire Local Government Area

Project Number: 250221



An initiative funded by the NSW Government through the
Regional Housing Strategic Planning Fund in association with
Bega Valley Shire Council



Document verification

Project Title:	Bega Urban Land Release Planning Proposal
Project Number:	250221
Project Location:	Bega Valley Shire Local Government Area
Project File Name:	250221 Bega Urban Release ACHA Draft Post meeting v2.0
Consultant:	NGH Pty Ltd
Proponent:	Bega Valley Shire Council

Revision	Date	Prepared by	Approved by
Draft v2.0	6/05/2025	Glenn Willcox, Matthew Barber	Matthew Barber

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Acronyms and abbreviations

ACHA	Aboriginal Cultural Heritage Assessment
ACHCRP	Aboriginal Cultural Heritage Consultation Requirements for Proponents
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
BVSC	Bega Valley Shire Council
EP&A Act	<i>Environmental Planning and Assessment Act 1979 (NSW)</i>
ESD	Ecologically Sustainable Development
Heritage Act	<i>Heritage Act 1977 (NSW)</i>
IBRA	Interim Biogeographic Regionalisation for Australia
km	kilometres
LGA	Local Government Area
m	metres
NGH	NGH Pty Ltd
NPW Act	<i>National Parks and Wildlife Act 1974 (NSW)</i>
NSW	New South Wales
PAD	Potential Archaeological Deposit
RAP	Registered Aboriginal Party
SHI	State Heritage Inventory
SHR	State Heritage Register

Executive summary

Introduction

NGH Pty Ltd (NGH) has been contracted by Bega Valley Shire Council (BVSC) to undertake an Aboriginal Cultural Heritage Assessment (ACHA), for the Bega Structure Plan and Bega Urban Release Planning Proposal. This project incorporates a proposed urban expansion area, which involves potential for residential subdivision, immediately south of the township of Bega within the Bega Valley Shire Council Local Government Area.

Project proposal

The Project would eventually involve the subdivision of the lots for housing and associated infrastructure and supporting amenities. However, currently, the proposal is a Planning Proposal, with no Development Applications or design layouts available at this stage.

Aboriginal community consultation

The consultation with Aboriginal stakeholders for this project was undertaken in accordance with Section 60 of the *National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2019* and following the process outlined in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (ACHCRP).

As a result of this process, seven Aboriginal groups registered their interest in the proposal. An invitation to attend a meeting to discuss the progress and raise awareness of the project was sent to all RAPs, and one meeting was held.

A copy of the draft report will be provided to all registered parties for comment.

Archaeological context

The assessment included a review of relevant information relating to the landscapes within the Project Area. The predictions based on the modelling for the Project Area were that isolated artefacts, low-density artefact scatters, Potential Archaeological Deposits (PAD) and modified trees were the most likely site features to occur, with the most archaeologically sensitive areas for the region noted to generally occur in association with water sources and/or on elevated ground. The topography and landscape features within and surrounding the Project Area suggested that the area may have potential for containing Aboriginal cultural material.

Survey results

No Aboriginal cultural heritage survey has been conducted for this assessment at the current time.

Potential impacts

Given that no survey has occurred, no assessment of impacts has been conducted.

Recommendations

It is recommended that:

1. Detailed and comprehensive field surveys are to be completed to assess the presence, extent, character and significance of any sites present prior to any ground disturbance works occurring. Surveys should aim to provide sufficient information to enable development and planning decisions to be made to avoid or limit the possible impacts on Aboriginal cultural heritage sites and places. This includes survey of all landforms to confirm the sensitivity modelling. The surveys must form part of an updated ACHA to complete the assessment outlined in this report.
2. Consideration should be given to undertaking preliminary field inspection of key parts of the Project Area to ground truth the sensitivity modelling prior to the rezoning. This would enable informed decision to be made regarding the rezoning proposal and possible heritage impacts.
3. Aboriginal consultation with the RAPS should be maintained. Communication with the RAPs must be conducted at a minimum of every six months to be considered as continuous consultation.
4. As part of the continued consultation, discussion should be had regarding the management of any cultural material collected or salvaged from the Project Area when necessary.
5. Any field surveys should be undertaken with representatives of the Aboriginal community.
6. The BVSC should consider opportunities for the development to engage with and acknowledge the Aboriginal occupation and use of the area within and throughout the Project Area. Any interpretive material regarding Aboriginal occupation and significance of the wider region should be developed in consultation with the local Aboriginal community.

1. Introduction

NGH Pty Ltd (NGH) has been contracted by Bega Valley Shire Council (BVSC) to undertake an Aboriginal Cultural Heritage Assessment (ACHA), for the Bega Structure Plan and Bega Urban Release Planning Proposal. This project incorporates a proposed urban expansion area, which involves potential for residential subdivision, immediately south of the township of Bega within the Bega Valley Shire Council Local Government Area (hereafter referred to as the Project Area) as shown in **Error! Reference source not found.**

On 12 June 2024 BVSC adopted the Bega Structure Plan (Structure Plan) which recognised that there is a severe housing shortage in the Bega Valley Shire, both for purchase and rental stock. Recent acceleration in the demand for housing within the Shire because of COVID-19 regional migration and retention means that facilitating development of future urban release areas in Bega is now a priority to ensure that there is a pipeline of housing supply in the area.

The Structure Plan identified approximately 261 hectares of land south of Bega township as suitable for the future urban expansion of Bega and capable of yielding approximately 2113 additional dwellings and accommodating a population of 4649 persons.

One of the aims of the Bega Structure Plan is to respect Aboriginal Heritage and the purpose of this report is to undertake an assessment to detail Aboriginal Heritage constraints in the Project Area.

The proposed future development work is likely to include a number of activities that will require substantial ground disturbance and the use of heavy machinery that has the potential to impact on Aboriginal heritage sites and objects which are protected under the NSW *National Parks and Wildlife Act 1974* (NPW Act). The ACHA has been undertaken to investigate and examine the presence, extent and nature of any Aboriginal objects within the Project Area and to determine if an Aboriginal Heritage Impact Permit (AHIP) application is required. The purpose of the ACHA is to determine if Aboriginal objects are to be harmed by the proposal and determine if an AHIP to impact any identified Aboriginal cultural heritage sites is required as a defence prior to ground disturbing works commencing.

1.1 Statutory context

This Aboriginal heritage assessment is to support the Bega Urban Release Planning Proposal and inform on the requirements related to management of Aboriginal cultural heritage for future development projects.

Aboriginal heritage is primarily protected under the NPW Act (1974) and as subsequently amended in 2010 with the introduction of the *National Parks and Wildlife Amendment (Aboriginal Objects and Places) Regulation 2010*. The aim of the NPW Act includes:

The conservation of objects, places or features (including biological diversity) of cultural value within the landscape, including but not limited to places, objects and features of significance to Aboriginal people.

An Aboriginal object is defined as:

Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons on non-Aboriginal extraction and includes Aboriginal remains.

Part 6 of the NPW Act concerns Aboriginal objects and places and various sections describe the offences, defences and requirements to harm an Aboriginal object or place. The main offences under section 86 of the NPW Act are:

- A person must not harm or desecrate an object that the person knows is an Aboriginal object.
- A person must not harm an Aboriginal object.
- For the purposes of this section, "circumstances of aggravation" are:
 - that the offence was committed in the course of carrying out a commercial activity, or
 - that the offence was the second or subsequent occasion on which the offender was convicted of an offence under this section.
- A person must not harm or desecrate an Aboriginal place.

Under section 87 of the NPW Act, there are specified defences to prosecution including authorisation to harm in accordance with an AHIP or through exercising due diligence or compliance through the regulation. Section 89A of the Act also requires that a person who is aware of an Aboriginal object must notify the Director-General in a prescribed manner. In effect this section requires the completion of an Aboriginal Heritage Information Management System (AHIMS) site card for all sites located during heritage surveys. Section 90 of the NPW Act deals with the issuing of an AHIP, including that the permit may be subject to certain conditions.

The NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) is legislation for the management of development in NSW. It sets up a planning structure that requires developers (individuals, councils or companies) to consider the environmental impacts of new proposals. Under this Act, cultural heritage is a part of the environment. This Act requires that Aboriginal cultural heritage and the possible impacts to Aboriginal heritage that development may have formally considered in land-use planning and development approval processes.

1.2 Objectives of assessment

As the future subdivision works within the Bega Urban Release Area would involve ground disturbance there is potential to impact on Aboriginal heritage sites and objects, which are protected under the NPW Act. The purpose of this report is to investigate the presence of any Aboriginal sites within the Project Area, assess the impacts to any Aboriginal sites within the Project Area and provide management strategies that may mitigate any impacts. The purpose of this ACHA is to determine if Aboriginal objects are to be harmed by the proposal and determine if an AHIP application to impact any identified Aboriginal cultural heritage sites is required. It is noted that this ACHA report builds on a desktop due diligence assessment completed by NGH for the Bega Structure Plan (NGH 2023).

It is noted that no field survey has been undertaken to date within the Project area as part of this ACHA but this report forms the basis of providing an assessment of the archaeological potential present and identifies next steps in an assessment process. As such, the objectives of the assessment were to:

- Conduct Aboriginal consultation as specified in clause 60 of the National Parks and Wildlife Regulation 2019, using the consultation process outlined in the ACHCRP;
- Identify if a field survey of the Project Area to locate and record any Aboriginal objects within the Project Area is required;
- Undertake an assessment of the archaeological and cultural potential of the Project Area and any known Aboriginal objects therein;
- Assess the impacts of the development proposal may have on known or potential cultural heritage sites; and
- Provide management recommendations for any Aboriginal cultural heritage objects identified or future assessment requirements.

Broadly, the aims of the project were to:

- Identify the known Aboriginal cultural material within the Project Area.

- Assess the likely extent and nature of any such cultural material.
- Provide an opportunity for Aboriginal stakeholders to be consulted and provide information about the cultural significance of the area.

This ACHA report was completed by Glenn Willcox (*NGH Senior Heritage Consultant – BA Hons with 15 years' experience*), including all background research, GIS mapping, report writing and review, and Matthew Barber (*NGH Technical Director- Heritage– BA Hons with 33 years' experience*) reporting and review.

Consultation with the Aboriginal community was undertaken following the process outlined in the ACHCRP by BVSC and has been summarised based on information provided by BVSC.

1.3 Report format

The ACHA report was prepared in accordance with the following guidelines:

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (DECCW 2011);
- *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a a); and
- *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010b)

This report is structured in accordance with the outline provided under Requirement 11 in the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a). It should be noted that this ACHA report incorporates the technical results findings into a single streamlined report. The report includes the following components:

Section 1 – Introduction, statutory context, and study objectives

Section 2 – Background context for the Project

Section 3 – Aboriginal community consultation

Section 4 – Details of the relevant cultural context and previous archaeological studies

Section 5 – Relevant environmental and landscape context

Section 6 – Predictive model

Section 7 – Details of field survey methodology, coverage, and results

Section 8 – Details of subsurface test excavation strategy, methodology, and results

Section 9 – Analysis and discussion of results from the field survey and subsurface test excavations

Section 10 – Significance Assessment

Section 11 – Impact assessment

Section 12 – Management and mitigation considerations

Section 13 – Recommendations

Section 14 – References

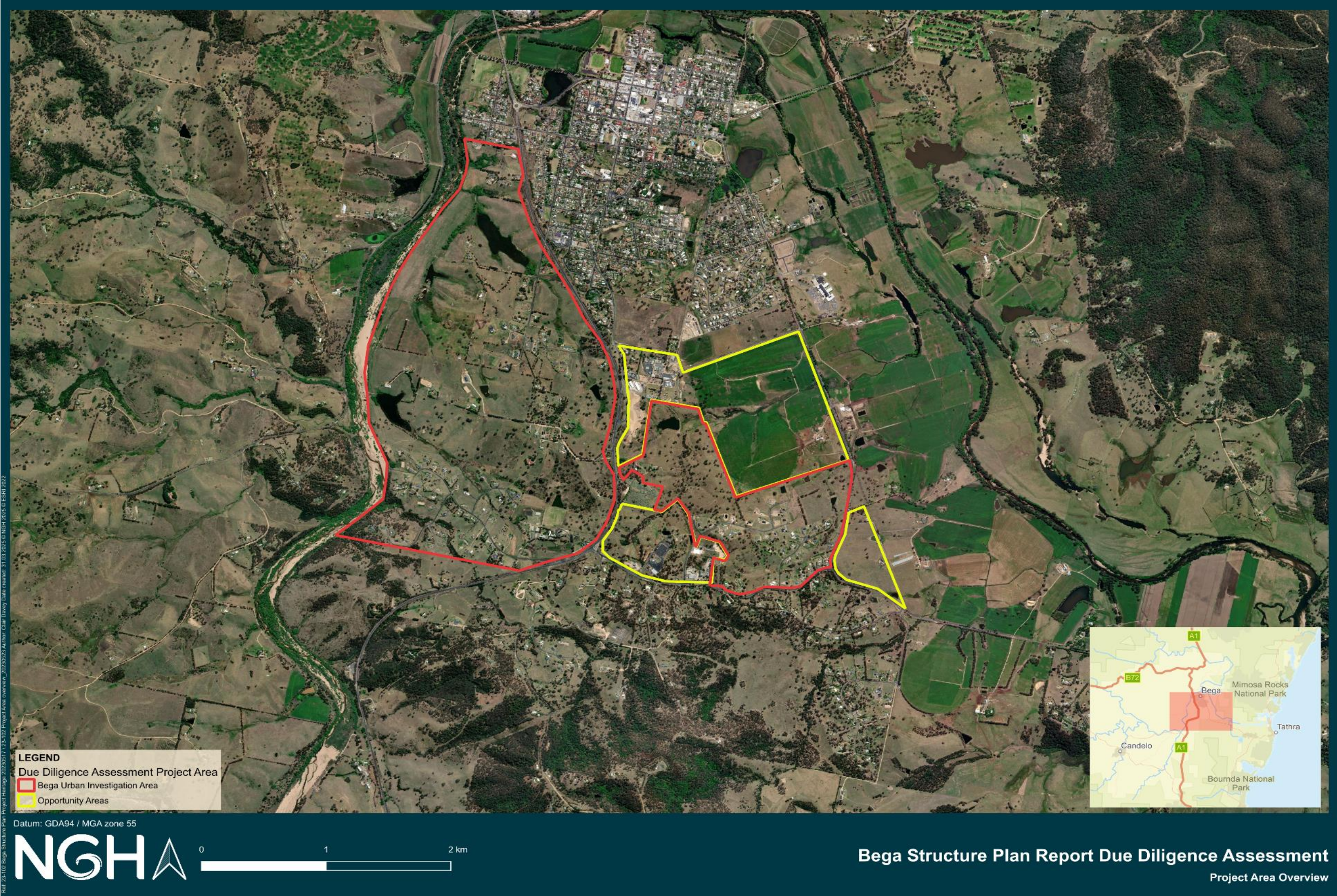


Figure 1-1 General location of Project Area.

1.4 Restricted information and confidentiality

Due to the sensitive nature of Aboriginal cultural heritage site information regarding site locations and types is considered to be generally restricted for the purposes of public exhibition. Therefore, Aboriginal site location maps and coordinates should not be provided on documents made available to the public. However, no specific restricted information has been provided as part of this assessment to date.

The Aboriginal Consultation Log must be redacted in any public version of this document.

1.5 Existing and previous AHIPs

NGH is aware of two Aboriginal Heritage Impact Permits that cover part of the Project Area.

- AHIP #1111625 issued for subsurface testing for proposed Bega Bypass test excavations in 2010. Covered part of the Princes Highway corridor adjacent and partially within the Project area. Now expired.
- AHIP #C0001744 issued to RD Miller Pty Ltd in 2016 for residential subdivision on Kerrisons Lane. Currently active, expires in 2026.

2. Description of the area

2.1 Project location

The Project Area is comprised of two designated areas to the south of the existing Bega township within the Bega Valley Shire Council Local Government Area as detailed below.

1. **Bega Urban Investigation Area (BUIA)** – This land initially comprised 658 ha where an estimated 2,600 dwellings may be built. The BUIA includes three rural residential subdivisions approved but not completed and BVSC will work with the potential developers of these parts of the Project Area to provide options that will increase dwelling yield.
2. **Opportunity Areas** - This land comprises 206 ha which adjoins the BUIA and may provide additional opportunities for future approval of residential subdivisions.

The Project Area for the Urban Land Release includes the following portions.

Table 2-1 Lot numbers within the Project Area.

Eastern precinct	
Address	Lot and Deposited Plan (DP)
Tathra Road BEGA	Pt Lots 1 & 2 DP 1101354 and Pt Lot 1 DP 1164038
1360 Tathra Road BEGA	Lot 2 DP 524618
361 Princes Highway BEGA	Lot 2431 DP 79375
Spanish Oaks Drive BEGA	Pt Lot 9 DP 1260384
Western Precinct	
Address	Lot and Deposited Plan (DP)
49 Finucanes Lane BEGA	Lot 582 DP 833035
51 Finucanes Lane BEGA	Lot 581 DP 833035
55 Finucanes Lane BEGA	Lot 72 DP 812308
61 Finucanes Lane BEGA	Lot 71 DP 812308
67 Finucanes Lane BEGA	Lot 73 DP 812308
69 Finucanes Lane BEGA	Lot 74 DP 812308
74 Finucanes Lane BEGA	Lot 1 DP 124058
83a Finucanes Lane BEGA	Lot 70 DP 878662 and Pt Lot 20 DP 1219302
83b Finucanes Lane BEGA	Lots 6 & 7 DP 986507
126 Finucanes Lane BEGA	Lot 71 DP 878662
160 Finucanes Lane BEGA	Lot 1 DP 78322
178 Finucanes Lane BEGA	PTL 1 DP 195102
198 Ravenswood Street BEGA	Lot 52 DP 836485 and Pt Lots 7, 8 & 9 DP 799413
200 Ravenswood Street BEGA	Lot 51 DP 836485
55 Applegum Close BEGA	Lot 2 DP 613365
Central Precinct	
Address	Lot and Deposited Plan (DP)
99 Boundary Road BEGA	Lot 242 DP 750190
163 Boundary Road BEGA	Lots 7005 & 7006 DP 1057325
Corkhill Place BEGA	Lots 2 & 3 DP 1077434
121 Boundary Road BEGA	Lot 240 DP 750190
133 Boundary Rd BEGA	Pt Lot 239 DP 750190

Following previous revisions by BVSC, in early 2025 the portion of the Project Area suitable for rezoning was subsequently refined reducing the Urban Land Release Planning Proposal possible rezoning Area to approximately 279 hectares as shown in Figure 2-1.

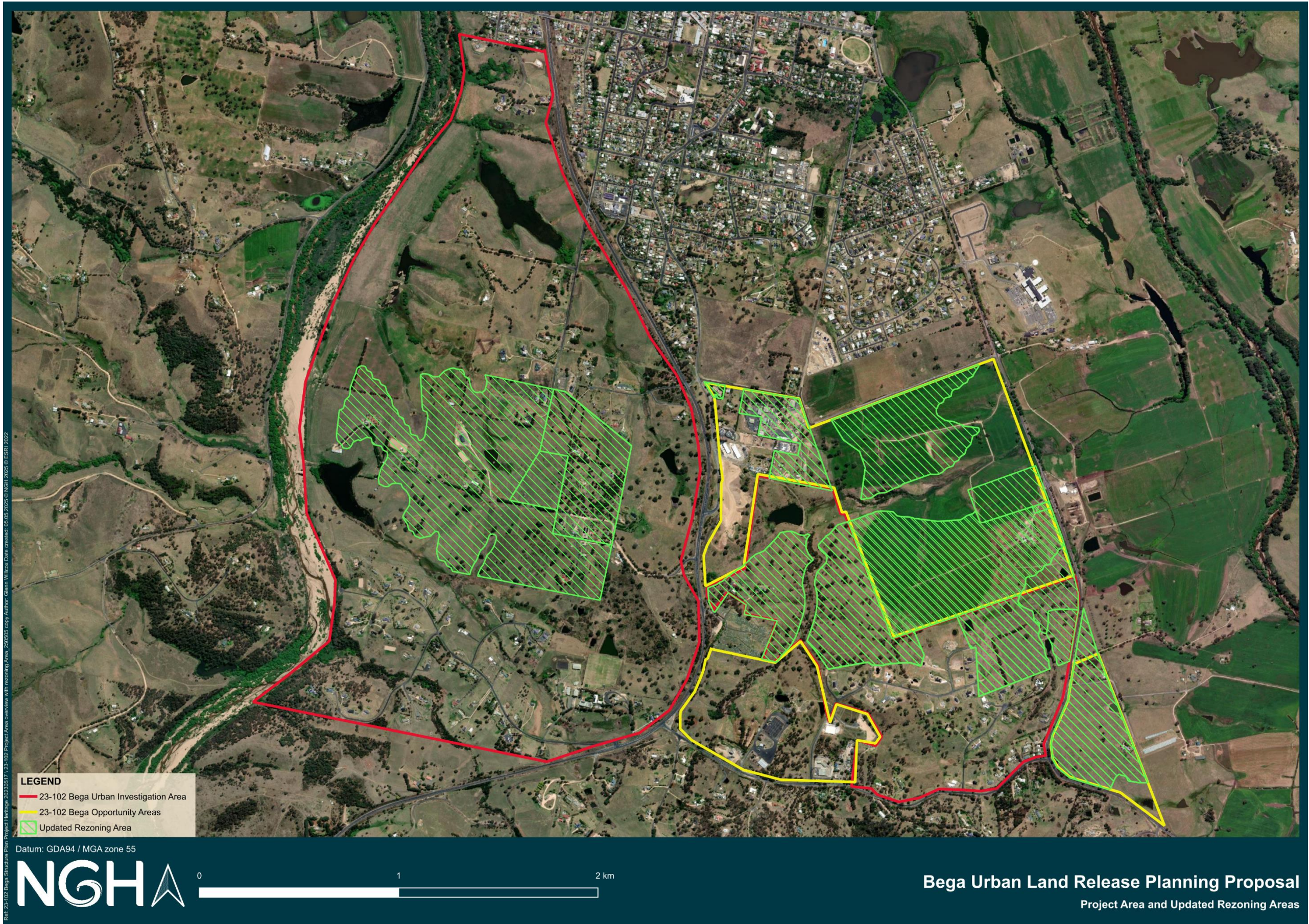


Figure 2-1 Project Area and updated Rezoning Areas

2.2 Proposed works

The Project would eventually involve the subdivision of the lots for housing and associated infrastructure and supporting amenities. However, currently, the proposal is a Planning Proposal, with no Development Applications or design layouts available at this stage.

Eventually the works would likely include a number of activities that may include, but not be limited to:

- Construction of houses, yards, driveways, fences;
- Construction roads including kerb and guttering and street lighting;
- Construction of sewage, storm water and other underground pipelines;
- Installation of power and communications cabling;
- General landscaping, open space, and other buildings such as shops, schools and public amenities.

These activities would require excavation of trenches, modification of the ground surface that would cause ground disturbance by use of heavy machinery. As such Aboriginal objects within the Project Area could therefore be subject to harm. The individual layout of each piece of infrastructure has not yet been finalised, as a result this assessment will assume potential impacts across the entire development footprint.

3. Aboriginal consultation

Consultation with Aboriginal stakeholders for this project was undertaken by BVSC in accordance with Section 60 of the *National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2019* and following the process outlined in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (ACHCRP). The guide outlines a four-stage process of consultation as follows:

- Stage 1 – Notification of project proposal and registration of interest.
- Stage 2 – Presentation of information about the proposed project.
- Stage 3 – Gathering information about cultural significance.
- Stage 4 – Review of draft cultural heritage assessment report.

The full list of consultation steps, including those groups and individuals who were contacted, and a consultation log is provided in Appendix A. A summary of actions carried out in following these stages are as follows.

Stage 1 Notification and registration of interest. Letters outlining the development proposal and the need to carry out an ACHA were sent statutory authorities as identified under the ACHCRP between the 6th of August 2024 and 4th of September 2024, with letters to Heritage NSW sent from the 16th of July 2024. An advertisement was placed in the local newspaper, *Bega District News*, on the 30th of August 2024 seeking registrations of interest from Aboriginal people and organisations.

Letters were sent via email on 22nd of August 2024 to the Aboriginal organisations and individuals identified by Heritage NSW and other agencies inviting them to register an interest in a process of community consultation with the BVSC regarding the project. BVSC has received expressions of interest from six respondents interested in being Registered Aboriginal Parties for this project.

Notification of the list of RAPs was provided to Heritage NSW on the 17th of September 2024.

The RAPs for the project are:

- Thomas Dahlstrom
- Girragirra Murun Aboriginal Corporation
- Bega Local Aboriginal Council
- Yurwang Gundana
- Applicant for the South Coast People's native title application (South Coast Peoples)
- Guntawang Aboriginal Resources Inc (GARI)

In addition, it is noted that the Djirringanj Elders Federation (DEF) was consulted during the due diligence assessment along with the Bega LALC and is therefore DEF also considered to be a RAP, bringing the total to seven.

Stage 2 Presentation of information on the project. An invitation was provided to all RAPs to attend a meeting on, either in person or online, where BVSC staff were presenting information related to the project. With the invitation, BVSC included a project methodology document, which included the PowerPoint presentation material.

The purpose of the presentation was to:

1. Present the Bega Urban Release Planning Proposal (the project) to the Registered Aboriginal Parties; and

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2. Provide the Registered Aboriginal Parties with the opportunity to provide feedback to inform matters such as:
 - Aboriginal cultural heritage assessment methodology & impact assessment processes
 - the cultural significance of Aboriginal object(s) and/or place(s) that may be present on the proposed project area.

The presentation meeting was held on 17 October 2024 and was attended by three Registered Aboriginal Party representatives as detailed below:

- Ellen Mundy (Bega LALC and Djirriganj people)
- Peter Dixon (Bega LALC)
- Wendy Morgan (Guntawang Aboriginal Resources Inc)

Issues raised by the Representatives who attended include:

- the need for a site survey over the whole area;
- the need for a plan to protect artefacts;
- Bunaan rings need to be protected and buffered;
- access to scarred trees is needed;
- there is a need for appropriately qualified person/s (Aboriginal sites officer from the Land Council and/or a qualified archaeologist?) to be on site during earthworks;
- Interpretive signs in parks are suggested, and
- suburbs should be named in native language to acknowledge local history.

Both the “*Consultation with Aboriginal People – Presentation of Information (Stage 2)*” document and the PowerPoint presentation made it clear that:

- an application for an Aboriginal heritage impact permit (AHIP) under the *National Parks and Wildlife Act 1974* was not being made at the planning proposal stage.
- AHIP applications are expected to be made at the development application (DA) stage by proponents for future subdivisions as and when they occur.
- Council remains flexible with respect to the Aboriginal cultural heritage assessment methodology and impact assessment process.
- RAPs were encouraged to provide feedback to inform matters such as:
 - Aboriginal cultural heritage assessment methodology & impact assessment processes.
 - the cultural significance of Aboriginal object(s) and/or place(s) that may be present in the project area.

The RAPs were further informed of what would happen next following the completion of the Stage 2 presentation. This included Council to:

- prepare & forward the proposed cultural heritage assessment methodology;
- seek feedback on the proposed cultural heritage assessment methodology;
- seek feedback to inform the cultural significance of Aboriginal object(s) and/or place(s) that may be present on the proposed project area;
- prepare supplementary information to accompany or update the 2023 Preliminary Aboriginal Heritage Desktop Assessment, based on the above feedback, and
- finalise the draft planning proposal and submit it to the DPHI (by April 2025) with a request for a gateway determination to proceed to public exhibition and eventual finalisation.

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On 21 October 2024 Council emailed a copy of the record of the meeting and presentation to the Registered Aboriginal Parties.

On 6 November 2024 Council emailed its proposed methodology for the Bega Urban Release Planning Proposal project to the Registered Aboriginal Parties. The document emphasised that:

1. The landowners who wish to subdivide and develop the rezoned land in the future will become the Proponents that will need to apply for AHIPs.
2. It is at this point that Aboriginal cultural heritage assessment reports (ACHARs) and associated survey and field work will be undertaken.
3. It is also expected and most likely that applicants for subdivision within the rezoned project area will be required to submit ACHARs with their DAs. Each DA will include the more detailed plans and information of the development that is proposed on individual sites and lots within the rezoned area. This will enable a more thorough assessment of:
 - the cultural significance of Aboriginal object(s) and/or place(s) that may be present
 - potential or likely impact of the proposal on any Aboriginal object(s) and/or place(s)
 - management proposals or measures to avoid or reduce impacts.

As required by the guideline Council allowed a minimum period of 28 days in which to provide feedback. The closing date for feedback was 5 December 2024.

Stage 3. The Assessment Methodology outlined in Stage 2 included a written request to provide any information that may be relevant to the cultural heritage assessment of the Project Area.

The methodology document invited the Registered Aboriginal Parties to provide:

1. any additional cultural information identifying whether there are any:
 - Aboriginal objects of cultural value to Aboriginal people within the proposed Project Area;
 - places of cultural value to Aboriginal people within the proposed Project Area (whether they are Aboriginal places declared under s.84 of the NPW Act or not). This will include places of social, spiritual and cultural value, historic places with cultural significance, and potential places/areas of historic, social, spiritual and/or cultural significance.
2. input on potential management options.

Council did not receive any feedback on:

- the proposed methodology;
- additional cultural information identifying whether there are any Aboriginal objects of cultural value or places of cultural value to Aboriginal people within the proposed project area.

Stage 4 Fieldwork consultation meeting

An invitation was provided to all RAPs to attend a meeting, either in person or online, where NGH and BVSC staff presented updated information related to the project. At the meeting held on 29 April 2025, a PowerPoint presentation provided updated mapping information material including updated AHIMS site data and mapping of the refined urban release area.

The purpose of the presentation was to:

1. To engage with the Registered Aboriginal Parties (RAPs) to identify parts of the previously established proposed urban release area that should be targeted for future on ground survey work. Additionally, input was sought regarding the approach for any field inspections undertaken during the planning proposal project.

The presentation on 29 April 2025 was attended by one Registered Aboriginal Party representative as detailed below:

- Wendy Morgan (Guntawang Aboriginal Resources Inc)

The discussion briefly addressed the Aboriginal community consultation undertaken to date for the project and revisited the likely process for future assessment of Aboriginal cultural values on the lands subject to the Urban Planning release project. This being that any landowners who wish to subdivide and develop the rezoned land in the future will become the Proponents. It would be during the subdivision and development

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process that the Proponents will be required to undertake Aboriginal cultural heritage assessments with associated Aboriginal community consultation processes, survey field work will be undertaken in partnership with RAPs. The resulting reports (ACHARs) would be submitted to support applications for AHIPS if required.

Key points from the discussion raised by Wendy Morgan were as follows:

- The status of artefacts collected during previous investigations associated with testing undertaken by Dibden (2005) was questioned particularly as to whether they had been returned to Country following the necessary analysis? This could not be answered by those attending the meeting.
- Any cultural material collected from future assessments should be returned to Country in a location as close as possible to its original location .
- The potential for ceremonial grounds to be present and the challenges of identifying these locations during ground survey was acknowledged.
- Detailed investigations of the Aboriginal cultural values of the rezoning areas should be undertaken during the planning phase before the areas are rezoned. This would allow a full understanding of the sensitivity of the landscape to be understood by Aboriginal community and BVSC and the prior to any rezoning of the land.
- The field inspections should focus on the areas identified as higher sensitivity areas but should also investigate areas of understood lower sensitivity as well.
- Support for the planning proposal was expressed, as it can help to reduce the housing crisis in Bega but need to ensure that Aboriginal cultural values are understood and respected during the process.

Some additional points that were discussed by BVSC and NGH representatives with Wendy Morgan included the following.

- Field inspections undertaken, if any, during the planning phase would focus on the reduced rezoning area (279 Ha).
- The aim of any field inspections would be to ground truth the archaeological sensitivity modelling previously done from a desk top assessment.
- The challenges with undertaking fieldwork during a planning project were discussed, in particular obtaining access authorisation from landowners outside of a development context.
- BVSC would explore possibilities for undertaking field inspections as part of the planning project.

Stage 5 A draft version of this *Aboriginal Cultural Heritage Assessment Report* for the Project will be provided to the RAPs inviting comment on the results. A minimum of 28 days was allowed for responses to the document and all responses were incorporated into this document.

3.1 Aboriginal community feedback

When NGH were undertaking the due diligence assessment, on the 29th of May 2023 John Dixon, a representative from the Djirringanj Elders Federation, verbally provided the following general statements about the cultural values associated with the Project Area and planning for future developments. The wording below which is based on notes taken by Glenn Willcox was approved by John Dixon for inclusion on the 29th of May 2023.

“At this stage I will provide general information about the area, but more detailed information is known.

The landscape south of the township of Bega, including the Project Area for the Bega Structure Plan, is a culturally significant landscape to the Djirringanj people. The area includes the biggest trading

ground in the region and was a prime hunting ground as well. There are very significant ceremonial sites in the area.

This information has long been known to the current Djirringanj people and it is vital that ongoing consultation is undertaken during any planning and development programs. Adequate consultation is the key to avoid a repeat of past damaging impacts from development activity to significant cultural places in the area.”

(per comm John Dixon 29/05/2023)

Further consultation and field surveys may provide information about any places of cultural significance.

4. Cultural context

4.1 Ethnographic setting

There are several ethnographic recordings of Aboriginal life in the region that notably focus on the prevalence of Aboriginal people around waterways and the coastal region. It is important to consider that the Aboriginal people alive at the time of such observations were survivors of serious epidemics of infectious diseases, such as smallpox, brought by Europeans, as well as acts of violence and murder which greatly affected the population sizes and distribution of people within the landscape. Consequently, European records may not necessarily reflect pre-contact population distributions and traditional ways of life (Dowling 1997; Littleton & Allen 2007).

The dispossession from traditional lands caused great social upheaval meaning that access to traditional resource gathering and hunting areas, religious life, marriage links and sacred ceremonial sites were disrupted or destroyed. Despite this Aboriginal people continued to maintain their connections to sites and the landscape in a variety of ways. The Aboriginal people of the region continue to maintain a strong connection to their land.

Tribal boundaries and social structure

Cultural areas are difficult to define and “must encompass an area in which the inhabitants have cultural ties, that is, closely related ways of life as reflected in shared meanings, social practices and interactions” (Egloff, Peterson & Wesson 2005, p.8). Depending on the culture defining criteria chosen - i.e., which cultural traits and the temporal context (historical or contemporary) - the definition of the spatial boundary may vary. In Australia, Aboriginal “marriage networks, ceremonial interaction and language have been central to the constitution of regional cultural groupings” with the distribution of language speakers being the main determinate of groupings larger than a foraging band (Egloff, Peterson & Wesson 2005, pp.8 & 16).

Bega is generally accepted to be within Yuin Country, which extends along the south coast of NSW from Shoalhaven River in the north to around Eden in the south then inland to the eastern edge of the tablelands and is comprised of several tribal groups. The Project Area is within an area that belonged to the Djirringanj people (BVSC 2010, p 3) with Tindale defining their area as being from Tilba Tilba in the north to Bega in the south (Dibden 2006).

It should also be noted that today not all Aboriginal groups agree with the mapped boundaries presented in Tindale and other publications. Borders were most likely not static but fluid, expanding and contracting over time with the movements of smaller family or clan groups. These boundaries ebbed and flowed through contact with neighbours, the seasons and periods of drought and abundance. The close proximity to each other also meant that people likely spoke multiple languages and dialects (Howitt 1904; Tindale 1974; MacDonald 1983; Horton 1994).

It was the small family group at the core of Aboriginal society and the basis for their hunting and gathering life. The immediate family camped, sourced food, made shelter and performed daily rituals together. The archaeological manifestations of these activities are likely to be small campsites, characterised by small artefact scatters and hearths across the landscape. Places that were visited more frequently would develop into larger site complexes with higher numbers of artefacts and possibly more diverse archaeological evidence.

The small family units were parts of larger bands that comprised a number of families. They moved within an area defined by their particular religious sites (MacDonald 1983). Such groups might come together on special occasions such as pre-ordained times for ceremonies, rituals or if their paths happened to cross. They may also have joined at certain times of the year and at certain places where resources were known to be abundant. The archaeological legacy of these gatherings would be larger sites rather than small family

camps. They may include large hearth or oven complexes, grinding implements and larger ranges of stone tools and raw materials. Identification and differentiation of such sites are difficult in the field. A family group and their antecedents and descendants occupying a particular campsite repeatedly over a long period of time may leave a similar pattern of archaeological signatures as a large group who camped in an area over a shorter period.

With the onset of European expansion/settlement of the far South Coast of NSW, there came a significant and devastating change to Aboriginal life in the region. The Aboriginal population quickly went into decline, due to the plethora of brought diseases such as smallpox, influenza and measles. Dispossession from traditional lands and acts of violence against the Aboriginal people meant there was great social upheaval and partial disintegration of traditional ways of life.

Europeans first entered the Yuin south coast region in the late 18th century as part of whaling expeditions, which very soon started to exploit the coast and river valleys (Williams Barber Archaeological Services 1996, p.5). In 1883, the Bega Gazette commented on the decline in the local Aboriginal population with a corroboree held at Stoney Creek that was once attended by 800 individuals, 28 years later did not exceed 60 attendees.

Decades after the initial invasion of the south coast, Aboriginal people found employment within the newly established settler economy, while maintaining their cultural traditions and relationship with the land (Chittick & Fox 1997, p. 191 as cited in Dibden 2009, p.15). Coming into the late 19th century, Aboriginal people mostly lived in camps surrounding the small settlement of Bega until in 1891 the Aboriginal Protection Board moved most of these communities into the newly built Wallaga Lake reserve, which served to act like a prison for its many Aboriginal residents (Byrne 1984 as cited in Dibden 2009, p.15). Decades later in the 1940s and 50s, Aboriginal people found seasonal employment as labourers on the bean and pea fields, and with the end of World War II they also found work in the newly established timber industry (Dibden 2009, p.14).

Despite all these disruptions to Aboriginal cultural traditions, Aboriginal people continued to live in the area and maintain their connections to sites and the land. Some of the early settlers, pastoralists, surveyors, explorers, administrators, and others observed traditional Aboriginal activities, including ceremonies, burial practices and general way of living, and recorded these in letters, journals and books. These early records of Aboriginal lifestyle and society within the region assist in understanding parts of the traditional Aboriginal way of life, albeit already heavily disrupted at the time of the observations and through the eyes of largely ignorant and uninformed observers.

Material culture, food and resources

In referring to gatherings of Yuin people, Egloff (1979 as cited in NGH Pty Ltd 2020a, p.16) cites ethnohistoric accounts of large gatherings at corroborees and initiation ceremonies located at locations like Mumbulla Mountain north of Bega. The Project Area is within walking distance of three different environmental zones (i.e. estuary, coast and forest); thus, resources from each of these zones could have been exploited providing a rich and varied diet of fauna and flora (Dibden 2009, p.14). Ethnohistorical sources referring to the Bega and Eden regions indicate that the Aboriginal people utilised numerous coastal environments collecting marine resources such as fish and shellfish with camps situated along coastal dunes and/or in forested areas within close reach of marine environments (i.e., sea, rock-pools, rivers, creeks and lakes) (Sullivan 1982). The Yuin diet could consist of fish, shellfish, crustaceans, sea mammals, birds, reptiles, a variety of terrestrial mammals and insects (Sullivan 1982, pp.25–7, 44). The most common sources of nutrition would have come from fruits, berries, cabbage palms, macrozamia (i.e. burrawangs), various roots and yams which in most cases require less energy to source and collect (Sullivan 1982, p.43). Unfortunately, ethnographic accounts mostly document the various terrestrial and marine fauna that Aboriginal people hunted and consumed, very little attention was given to what species of flora were gathered and consumed (Sullivan 1982, p.35). In a study by Low (Low 1991) a total of 72 edible plant species were identified along an area of the far south coast, although the total did not include seaweed, which had been recorded as a food resource in some areas on the coast, or fungi (Low 1991, p.191-4 as cited in NGH Pty Ltd 2020a, p.16). Very little is known

about Aboriginal use of fungi of which there are several edible species available along the coast other than the common field mushroom (Low 1991, p. 191-4 as cited in NGH Pty Ltd 2020a, p.16).

Additional records from the region describe fishing methods utilised on Black Ada Lagoon near Tathra, where, through combined effort, people would drive fish into a particular confined area of the lagoon where the increased density of fish would make them easier to spear (Smith 1970, p.5). Historical sources also reveal that beached large sea mammals would be exploited when the opportunity presented itself. At Twofold Bay, Fraser (1892) witnessed Aboriginal people taking what they could from a whale carcass, with people spreading the word of its existence so that all nearby groups could partake of the immense resource before it spoiled, in order to minimise waste.

Ethnographic observations of the Aboriginal people and their customs by early settlers in the south coast region have been studied by Boot (2002). Boot (2002) stated, that like everywhere in Australia, Aboriginal people on the south coast were adept at identifying and utilising resources either on a seasonal basis or all year round. Terrestrial animals such as the possum and Kangaroo were noted by many early observers as a prime food source and the skins were made into fine cloaks that were evidently very warm. Boot (2002) also noted a range of reptiles and other mammals such as goanna, wombat, seal and even whale that were utilised as a food source in the region. Fish and shellfish, including mussels, would have been prevalent in the lakes, rivers and creeks and insects were also a common food type, in particular grubs, ants and ant eggs (Townsend 1848; Fraser 1892; Pearson 1981) .

Birds were also common as a food source, often being caught in nets made from fibres of various plants such as flax, rushes and kurrajong trees. Bird hunts were often undertaken as group activities with ducks and other birds targeted where groups of people would flush them out and drive them into pre-arranged nets (Ramson 1983). Plant foods were equally as important and mostly consisted of roots and tubers. Other edible plants from the south coast region include apple, native cranberry, honeysuckle, cabbage tree, fruits and yams (Boot 2002).

As suggested by Boot (2002), the Yuin people had a highly varied material culture with the manufacturing of items such as spears (barbed and un-barbed), clubs, canoes, fishing line, nets, stone axes, vine traps, ropes, textiles, weirs (fish traps), bark huts, containers, shields, and skin cloaks. Items made for personal adornment were highly prized, such as kangaroo tooth necklaces, body paint, belts, ceremonial kilts and other ceremonial items like bull roarers (Williams Barber Archaeological Services 1996, p.5). Fire was utilised as a tool to shape the landscape to their advantage, creating open areas conducive to hunting and/or camping and the creation of fertile soils to encourage regrowth of healthy grasses, plants and trees (Gammage 2012).

Early observations by Europeans also note some weapons and tools were carried, some made from wood such as spears, spear throwers, clubs, shields, boomerangs, digging sticks, bark vessels and canoes. Other materials were observed in use such as stone axes, shell and stone scrapers, and bone needles. In an archaeological framework, few of these organic items would survive, particularly in an open site context. Anything made from bark, timber and animal skins would decay quickly in an open environment.

However, other items, in particular those made of stone, would survive where they were made, placed or dropped. Shell material may also survive in an archaeological context with the presence of “immense heaps of cockle-shells, the accumulation of which is difficult to account for” noted by Townsend (1848, p.27) as he passed through the area of Burrill Lake and Ulladulla. Use of raw materials, such as the extraction of wood or bark would leave scars on trees that are archaeologically visible, although few trees of sufficient age survive in modern day. Outcropping stone sources provide clues to their utilisation through flaking, although pebble beds may also provide sources of stone that leave no archaeological trace.

Despite all of the hardships endured by the Yuin people at the hands of the European settlers and the diseases they brought with them they have managed to retain their cultural identity, with cultural traditions continuing strongly to this day.

4.2 AHIMS search

A search of relevant heritage registers for Aboriginal sites and places provides an indication of the presence of previously recorded sites. A register search is not conclusive, however, as it requires that an area has been subject to archaeological survey, and information about any sites identified has been submitted for registration. However, as a starting point, the search will indicate whether any sites are known within or adjacent to the Project Area and provide oversight regarding the site types most commonly recorded within the local area.

The Aboriginal Heritage Information Management System (AHIMS) provides a database of previously recorded Aboriginal heritage sites in NSW. An extensive search provides basic information about any sites previously identified within a search area. On the 17th of May 2023 an extensive search of the AHIMS database was undertaken over an approximately 15 km x 15 km area centred on the Project Area for the Due Diligence assessment, that resulted in 87 sites being listed.

However, as the AHIMS data is only valid of 12 months another AHIMS search was conducted on 11 April 2025 for this ACHA. The results were:

- Client Service ID:995115
- MGA Zone 55, Eastings 746000-761000, Northings 5928000-5943000
- Aboriginal objects: 95
- Aboriginal Places: 0

There were 95 Aboriginal sites recorded within this search area and no declared Aboriginal Places, noting an increase of eight sites from the 2023 search conducted, although none are recorded within the Project Area. Table 4-1 Breakdown of previously recorded Aboriginal sites in the region.

below shows the breakdown of site types and **Error! Reference source not found.** show the location of the AHIMS sites in relation to the Project Area.

Table 4-1 Breakdown of previously recorded Aboriginal sites in the region.

Site type	Number	%
Potential Archaeological Deposit (PAD)	40	42.1
Artefact (1 or more)	26	27.4
PAD and Artefact (1 or more)	11	11.6
Modified Tree	8	8.4
Ceremonial Ring (stone or earth)	5	5.3
Restricted Sites	3	3.2
Ceremonial Ring (stone or earth), Artefact and shell	1	1.1
Ceremonial Ring (stone or earth) and Artefact	1	1.1

Site type	Number	%
Total	95	100

A total of 23 previously recorded Aboriginal sites on AHIMS are located within the BUJA portion of the Project Area as summarised in Table 4-2 Sites within the BUJA Project Area.

below. A total of nine of previously recorded Aboriginal sites on AHIMS are located within the Opportunity Areas as summarised in Table 4-3 Sites within the Opportunity Areas.

below.

An additional six previously recorded Aboriginal sites on AHIMS have GPS point locations immediately adjacent to and in close proximity (within 150 m) to the Project Area as summarised in Table 4-4 Sites with GPS point locations immediately adjacent and in close proximity to the Project Area.

below.

Confirmation was received from Heritage NSW on the 23rd of May 2023 that none of the three sites with restricted location information included in the search results are located within or in close proximity to the Project Area.

Table 4-2 Sites within the BUJA Project Area.

Site number	Site name	Site type	Site status on AHIMS
62-6-0617	South Bega - Survey Unit 1	PAD	Valid
62-6-0618	South Bega - Survey Unit 2	PAD	Valid
62-6-0619	South Bega - Survey Unit 4	PAD	Valid
62-6-0620	South Bega - Survey Unit 5	PAD	Valid
62-6-0621	South Bega - Survey Unit 6/Locale 1	Artefact	Valid
62-6-0622	South Bega - Survey Unit 6/Locale 2	Artefact	Valid
62-6-0623	South Bega - Survey Unit 7	PAD	Valid
62-6-0624	South Bega - Survey Unit 8	PAD	Valid
62-6-0625	South Bega - Survey Unit 9	PAD	Valid
62-6-0626	South Bega - Survey Unit 10	PAD	Valid
62-6-0627	South Bega - Survey Unit 12	PAD	Valid

Site number	Site name	Site type	Site status on AHIMS
62-6-0628	South Bega - Survey Unit 16	PAD	Valid
62-6-0629	South Bega - Survey Unit 17	PAD	Valid
62-6-0631	South Bega - Survey Unit 23	PAD	Valid
62-6-0633	South Bega - Survey Unit 26	PAD	Valid
62-6-0634	South Bega - Survey Unit 30, including site Survey Unit 30/Locale 1	PAD and Artefact	Valid
62-6-0635	South Bega - Survey Unit 31	PAD	Valid
62-6-0636	South Bega - Survey Unit 33, Including sites Survey Unit 33 / Locale 2 & Survey Unit 33/ locale 3	PAD and Artefact	Valid
62-6-0641	South Bega - Survey Unit 40, including site Survey Unit 40 / Locale 1	PAD and Artefact	Valid
62-6-0642	South Bega - Survey Unit 41	PAD	Valid
62-6-0643	South Bega - Survey Unit 42	PAD	Valid
62-6-0649	South Bega - Survey Unit 56	PAD	Valid
62-6-0650	South Bega - Survey Unit 58	PAD	Valid

Table 4-3 Sites within the Opportunity Areas.

Site number	Site name	Site type	Site status on AHIMS
62-6-0630	South Bega - Survey Unit 18	PAD	Valid
62-6-0637	South Bega - Survey Unit 35	PAD	Valid
62-6-0638	South Bega - Survey Unit 36	PAD	Valid
62-6-0639	South Bega Survey Unit 37, including site survey Unit 37/ Locale 1	PAD and Artefact	Valid

Site number	Site name	Site type	Site status on AHIMS
62-6-0644	South Bega - Survey Unit 43	PAD	Valid
62-6-0647	South Bega - Survey Unit 47	PAD	Valid
62-6-0648	South Bega - Survey Unit 52, including site Survey Unit 52 / Locale 1	Isolated Find	Valid
62-6-0715	Sediment Control PAD (Bega Bypass)	PAD	Valid
62-6-0824	TM21-01	PAD and Artefact	Valid

Table 4-4 Sites with GPS point locations immediately adjacent and in close proximity to the Project Area.

Site number	Site name	Site type	Site status on AHIMS	Distance to the Project Area
62-6-0054	Bega: Bega West	Ceremonial Ring	Valid	130 m west of the north-western boundary of the Project Area
62-6-0645	South Bega- Survey Unit 46 including site Survey Unit 46/ Locale 1	Artefact	Valid	Directly adjacent to Project Area
62-6-0711	High St to Rawlinson St PAD (Bega Bypass)	PAD	Valid	Directly adjacent to Project Area
62-6-0712	Rawlinson St to Prospect St PAD (Bega Bypass)	PAD	Valid	Directly adjacent to Project Area
62-6-0713	Prospect St to Applegum CI PAD (Bega Bypass)	PAD	Valid	Directly adjacent to Project Area
62-6-0714	Applegum CI to Reservoirs PAD	PAD	Valid	Directly adjacent to Project Area

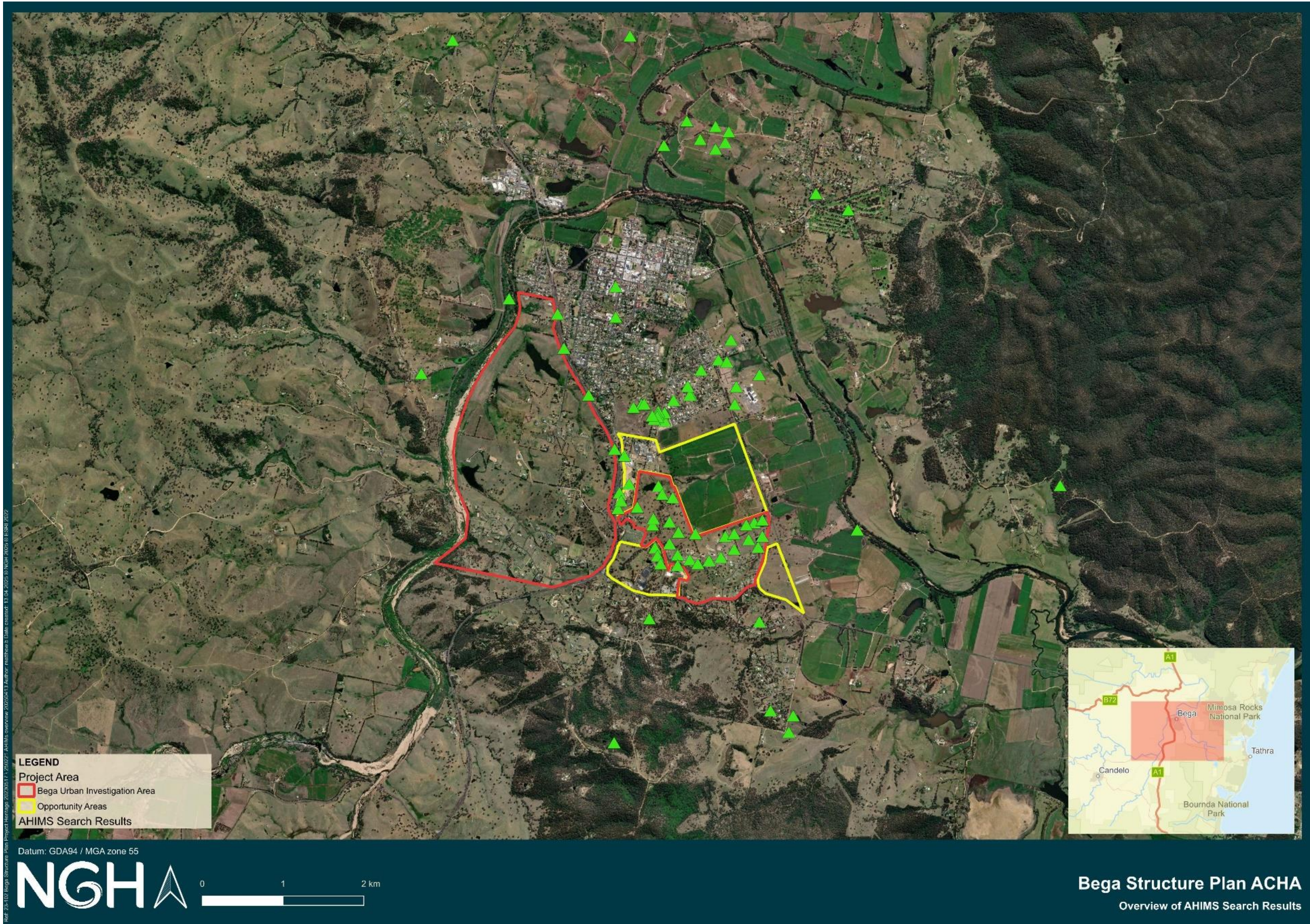


Figure 4-1 Previously recorded sites in AHIMS..

4.2.1 Other Register Heritage Searches

Other heritage register searches were also undertaken to identify any items or places in proximity to the Project Area. The following resources were used as part of this assessment:

- The NSW State Heritage Inventory (SHI), this includes items on the State Heritage Register and items listed by state agencies and local Government, to identify any items currently listed within or adjacent to the proposal area.
- The Australian Heritage Database, this includes items on the National and Commonwealth Heritage Lists, to identify any items that are currently listed within or adjacent to the proposal area.

The results of the Australian Heritage Database search indicated that 20 sites are located within Bega. The Bega General Cemetery, which is directly adjacent to the Project Area, is registered as an Indicative Place on the Register of National Estate (Non-Statutory archive)

The results of the NSW SHI database search indicated that there are three previously recorded Aboriginal Places listed under the National Parks and Wildlife Act within the NSW State Heritage Inventory within the Bega Valley LGA. None of the Aboriginal Places are located within or adjacent to the Project Area.

The results of the NSW SHI database search indicated that 12 previously recorded heritage sites are listed under the NSW Heritage Act within the Bega Valley LGA. No sites are located within the Project Area however, one site is located directly adjacent to the Project Area. This site is the Bega Cemetery (Listing No: I657).

The results of the NSW SHI database search indicated that 161 previously recorded heritage sites are listed by the Local and State Agencies within Bega in the Bega Valley LGA. Three of the sites are located within or adjacent to the Project Area which include:

- The Old Bega Hospital (Main building and outbuildings) (Item: 009)
- Bega Cemetery (Listing No: I657).
- Warragaburra Homestead (I002).

No other known previously recorded heritage sites or known possible heritage sites are located within or adjacent to the Project Area.

4.3 Archaeological context

A number of surveys have been undertaken in the Bega area primarily driven by land development works. An overview of these studies is provided below and those located in close proximity to the Project Area are shown in **Error! Reference source not found..**

Steele and Douglas (2001) undertook the survey of the Bega High School site. No sites were identified during the survey, which was noted to likely be the result of low ground surface visibility, and it was recommend that further assessment through a program of test excavation be undertaken to determine to true archaeological nature of the site. Subsequently, in 2002 a subsurface testing program was undertaken with a total of 19 artefacts recovered. The low artefact densities recovered from the area were noted to likely be due to the prior disturbance of the area (as cited in Dibden 2009).

Saunders (2003) conducted an Aboriginal archaeological assessment approximately 35 ha for the “Glen Mia” proposed subdivision on the southern fringe of Bega, on the western side of Tathra Road, approximately 200m north the eastern extent of the Project Area additional opportunities area. “Glen Mia” was noted to be highly disturbed from agricultural and clearing activities. The area consisted of gently to moderately inclined slopes and spur with intermittent streams that were tributaries of the Bega River. Two scarred trees and four PADs were identified. The PADs were located above first order streams on spur crests and slopes with PADs 1 and 2 covering approximately 100 m x 75 m, PAD 3 covering approximately 125 m x 100 m and PAD 4 covering 70 m x 50 m. Saunders recommended that the scarred trees be retained and that subsurface testing be undertaken in the in the PAD areas prior to any works (as cited in On Site CHM 2014 & RPS

2012). Saunders (2004) subsequently completed the recommended test excavations of the “Glen Mia” PADs through mechanical excavation using an excavator and backhoe. Each PAD was investigated by undertaking 2-3 scapes of the PAD area with samples of the excavated soil dry sieved through 4 mm mesh wire. The soil testing stopping when no more artefacts were detected. There were five artefacts recovered from the surface and 27 subsurface artefacts recovered from the testing program. The subsurface artefacts were recovered from depths of 0-30 cm. It was noted that as only a sample of the soil was tested, further artefacts may have been undetected. The low density of artefacts recovered from the testing program resulted in the assessment of the remaining “Glen Mia” area being determined as having low archaeological potential (as cited in RPS 2012).

Dibden (2005a) also completed a survey for the proposed subdivision of a property in South Bega, which is entirely incorporate into the eastern proportion of the current Proposal Area. Ten Aboriginal sites were identified, although it was noted that visibility was low, and the results likely did not accurately represent the archaeological potential of the area (as cited in Dibden 2009). Subsequently in 2006, Dibden undertook test excavations across the South Bega Property, comprising 38 test transects within 26 Survey Units. A total of 1,512 artefacts were recovered across 37 of the transects in very low or low densities. The artefacts were located across a range of survey units, and Dibden concluded that the area was not utilised for intensive Aboriginal occupation, but rather sporadic activities and movement through the country (as cited in Dibden 2009 & On Site CHM 2014). At South Bega the Survey Units which contained either low/moderate or moderate artefact densities were all situated in proximity (within 200 m) to drainage lines and were usually located at the confluence of two creeks; they were of low gradient (<5-6°) and orientated to either the north or east cardinal points. Survey Units such as high ridge crests located away from creek lines were found to contain either very low or low artefact densities. The majority of the valid Aboriginal AHIMS sites within the current Project Area were recorded during this assessment.

Dibden (2005b) completed an Aboriginal Archaeological assessment for the proposed Bega Eco-Neighbourhood Development for Bega Eco-Neighbourhood Developers, approximately 2.4 km north of the current Project Area (Dibden 2005b). During the study, two new sites comprising isolated artefacts were identified. The artefacts recorded were one silcrete and one volcanic flake. The artefacts were located within an area of exposure created through disturbance and on a side spur with low slope within fine granitic loam soil. It was determined that the area had low archaeological sensitivity for subsurface archaeological deposits based on the results of the field survey and the consideration of high levels of prior disturbances and the geomorphology of the area (Dibden 2005b).

Dibden (2006a) undertook a survey of 95 hectares at Wanatta Lane in Frogs Hollow, approximately 8.5 km south of the current Project Area, in advance the rural residential subdivision of this land. Four Aboriginal archaeological sites were recorded, all of which were stone artefacts in clusters or isolation. Three of the sites were recorded on spur crests and one site was recorded in association with a drainage line.

AECOM (2009) undertook a study within a proposed central waste facility at Frogs Hollow, approximately 11 km south-west of the current Project Area, but recorded no Aboriginal heritage sites.

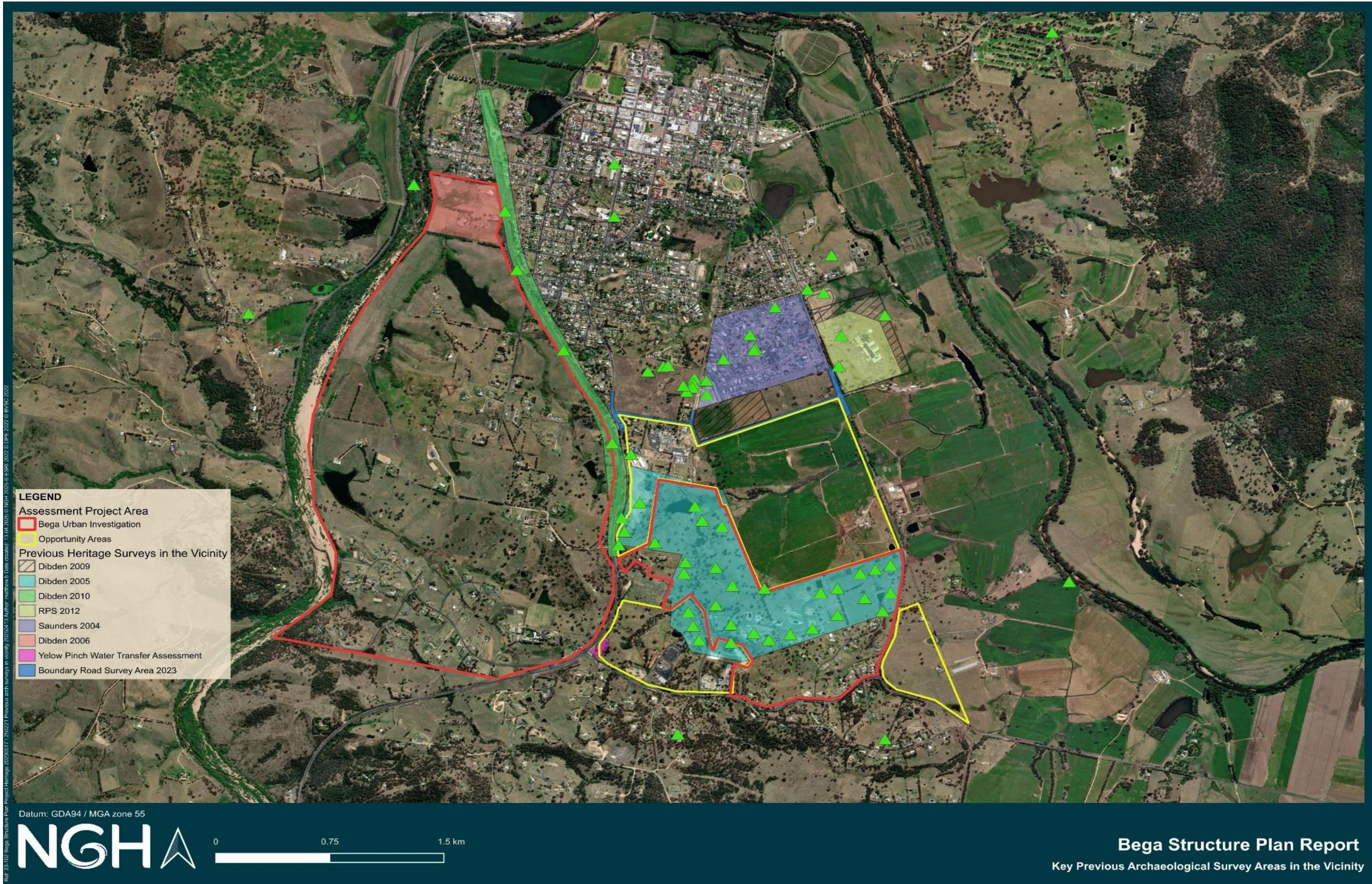


Figure 4-2 Previous studies located in close proximity to the Project Area.

Aboriginal Cultural Heritage Assessment

Bega Urban Land Release Planning Proposal

Didben (2009) surveyed two potential locations for a new hospital at Bega that included Site 1 at Boundary Road and Site 3 at Tathra Road, both areas assessed are adjacent to the current Project Area. No sites were located at the Site 1 area on Boundary Road. However, it was noted that an elevated crest landform within the Site 1 study area had potential to contain low density subsurface artefacts while very low densities were predicted to occur within the simple slope landforms. During the survey of the Site 3 study area two isolated finds were located on a hill crest overlooking the Bega River. Given that the Site 3 study area was located on elevated terrain in close proximity to the Bega River and its associated riverine swamp landscapes, the potential for subsurface artefacts was noted by Diben to likely vary across the study area with moderate densities on relatively flat landforms close to the river and very low densities on the simple slope landforms. While Diben noted that some landforms within the two study areas were likely to contain low density artefacts it was noted that further archaeological investigation of the areas was unlikely to identify sites of high or very high significance that would preclude the areas from future developments. Site 1 on Boundary Road was noted to be the least archaeologically significant of the two potential hospital site areas investigated during the study.

In 2009 the Bega Bypass route which is adjacent to the current Project Area was surveyed by Kayandel Archaeological Services who recommended that a subsurface testing program be undertaken in order to accurately determine the subsurface potential of the area to mitigate the poor visibility at the time of survey (as cited in Diben 2010). A subsequent subsurface test excavation program was undertaken in 2010 by Diben. Test pits were placed across five areas, which included the ridge near High Street to Rawlinson Street, a ridge near Rawlinson Street to Prospect Street, mid to upper slopes from Prospect street to Applegum Close, lower slopes opposite Finucane Lane and the upper to mid slopes of Applegum Close to the Reservoirs. A total of 60 test pits were excavated across the five areas that had been previously defined by Kayandel Archaeological Services. A total of 83 artefacts were recovered from 21 of the test pits. The majority of the artefacts recovered were recorded as debitage scattered across the areas with the highest artefact density noted to be the area from Rawlinson Street to Prospect Street. The areas tested from Applegum close to Reservoirs and Prospect Street to Applegum Close are adjacent to the western most portion of the current proposal area and consisted of test transects 5 to 8. The test transects were excavated for the purposes of obtaining a sample to characterise the density and nature of archaeological deposits in each of the areas. From the 24 test pits excavated within test transects 5 to 8 near the current Project Area total of seven artefacts were recovered. No artefacts were recovered from test transect 7. The artefact densities near the Project Area were all assessed by Diben to be very low with the seven artefacts recovered noted to be from spits 2 and 3 (20-30 cm below the surface), which was consistent with the depths artefacts were generally recovered from across the testing program. The artefact types recorded across the testing program included flakes, flake fragments, flaked pieces, retouched artefacts, and cores. The artefacts were predominately quartz with a lesser number of silcrete, volcanic, rhyolite, chert and a banded rhyolite. Diben (2010) noted that the density of artefacts recovered from the testing program was indicative of infrequent and short-term use and was likely representative of single use or shorter stays in the area as people moved through country. It was concluded that given the low artefact density recovered from the test excavation that the areas were unlikely to have been a focus of activity in the local area. The majority of the valid Aboriginal AHIMS sites directly adjacent to the current Project Area were recorded during this assessment.

In 2010 On-Site Cultural Heritage Management (On-Site) (2010) completed an Aboriginal heritage assessment of the proposed works area to widen and seal a 1.6 km portion of Wanatta Lane between the Princes Highway and the proposed Central Waste Facility near Wolumla, approximately 8 km to the south-west of the current Project Area. The potential for subsurface archaeological deposit along the road alignment was considered low due to the obvious existing disturbance and the absence of any foci point in the landscape that may have attracted Aboriginal occupation. No Aboriginal objects were identified.

An Aboriginal archaeological assessment was undertaken in 2012 by Diben for the proposed subdivision of rural lots on Tarraganda Farm, Corridgere Road, Bega, approximately 3 km north of the current Project

Aboriginal Cultural Heritage Assessment

Bega Urban Land Release Planning Proposal

Area. No Aboriginal sites were identified due to low visibility across the study area. However, it was determined that the area had high potential for Aboriginal past use due to its location adjacent to the Brogo River (<200 m), gentle to moderate slopes falling from a narrow, central crest. It was recommended that test excavations be undertaken prior to any works occurring in the area across five survey units identified by Dibden to include crests or simple slopes with gentle gradients that were noted to have low to moderate densities (as cited in RPS 2012 & On Site CHM 2014). Areas noted to have steeper gradient slopes were noted by Dibden to have very low potential for subsurface material. Following the survey Dibden subsequently undertook a subsurface testing program of the five survey units considered to be archaeologically sensitive. A total of 60 test pits were excavated across the five areas with a total of 121 artefacts recovered. The artefacts were recovered from 30 of the test pits across all the areas tested and it was noted that the areas generally had lower than predicted densities. Comparing the results of the subsurface testing to other studies in the area Dibden noted that the results seemed to reflect the modelling of the areas with low/moderate densities located in close proximity (< 200 m) to drainage lines or near the confluence of two or more water sources on low gradients. Areas located away from water sources were noted to have very low to low artefact densities.

In 2012 RPS conducted a cultural heritage impact assessment for the proposed South East Regional Hospital site in Bega, adjacent to the eastern edge of the current Project Area on Tathra Road. The location of a previously recorded site, an isolated grey volcanic flake (62-6-0724, a duplicate of 62-6-0707) was investigated, but the site was unable to be relocated. No new sites were located; however, it was noted that ground visibility was generally non-existent across the site. Two areas of PAD were identified on spurs in line with the modelling of the area and location adjacent to the Bega River floodplain. It was determined that any works in the area would require test excavations of the two PADs prior to proceeding (RPS 2012).

In 2014, On Site Cultural Heritage Management (On Site CHM) completed a due diligence investigation for the proposed wastewater irrigation expansion, approximately 850 m to the east of the current Project Area (On Site CHM 2014). No Aboriginal sites were located; however, five areas of PAD were identified. The landscapes surveyed included major river flats along the Brogo and Bega Rivers, and it was determined that these areas were likely major foci of Aboriginal occupation in the past, but that extensive disturbance has likely disturbed and dramatically altered sites. The report recommended that the proposed works be realigned to avoid the PAD areas.

In 2020 NGH completed an Aboriginal Due Diligence assessment (NGH 2020b) for proposed road upgrade and intersection works along the extent of Boundary Road between Newtown Road and Tathra Road, Bega. While the study area was noted to be situated predominately within highly disturbed areas along the road corridor, previous studies in the Bega area have identified that spur lines, crests, and low gradient slopes in proximity to drainage lines have potential for low artefact densities and therefore a survey was undertaken to ensure any undisturbed areas within the road reserve that include these sensitive landforms was visually inspected. No Aboriginal sites or objects were recorded within the study area, and it was deemed that the area had low potential to contain *in situ* subsurface deposits due to the high level of existing disturbance.

Two other Aboriginal heritage assessments are known to have been undertaken either wholly or partially within the current Project Area. In 2006 Dibden undertook an assessment for a proposed Senior Living Project in Fairview St which is located at the most northern extent of the Project Area. Part of assessment area for the Bega to Yellow Pinch Water Transfer System Aboriginal heritage assessment undertaken by Dibden in 2009 falls at the southern extent of the Project Area. The reports for these assessments were not available during this investigation, however they should be considered in future Aboriginal heritage assessments for the Project Area if available.

In addition, eight sites, all artefact sites, were recorded by Onsite Cultural Heritage Management in the area north of Boundary Road and west of East Street. The sites recorded appears to be related to a subsurface testing programme but no report is available at the time of this assessment.

5. Environmental context

Understanding the landscape context of the Project Area may assist us to better understand the archaeological modelling of the area and assist in identifying local resources which may have been used by Aboriginal people in the past. This information can then potentially be used to predict the nature of Aboriginal occupation across the landscapes within and directly adjacent to the Project Area.

Factors that are typically used to inform the archaeological potential of landscapes include the presence or absence of resources that would have been used by Aboriginal people including water, animal and plant foods, stone and other resources. The environmental context is equally important in terms of the taphonomic process, erosion or other factors that may influence the detectability of Aboriginal heritage sites.

The landscape context assessment for the Project Area is based on a number of classifications that have been made at national, regional and local levels to help us better understand the archaeological modelling of the area based on the geology, topography, hydrology, flora and fauna and past land disturbances within and adjacent to the Project Area.

5.1 Geology

Understanding the geological character of the local area can assist with understanding what, if any, raw stone materials may have been available for the manufacture and maintenance of stone tools or for use as shelter. The Project Area comprises Devonian type granites (Dgi), which are granites that are interpreted to form by the melting of igneous source rocks. Common minerals are quartz, feldspar, and biotite. Additionally, amphibole is commonly present in this area (State Government of NSW and DPIE 2009). This bedrock type is unlikely to have been a source of stone material for Aboriginal people.

The eastern and western portions of the Project Area are situated on portions of Quaternary alluvium, comprising mud, silt, sand and gravel associates with the Bega River floodplain.

5.2 Topography and landscapes

The general topography of the Project Area and its surrounding area consists of gently rolling hills. The landscape is dominated by hill crests and moderate to gentle spurs, slopes and gullies. The Project Area is located at the northern extent of the north to south-oriented Black Range, which extends to Merimbula in the south, and is a known a travel route utilised by Aboriginal people. The Project Area comprises a low, gentle north to south-trending ridge with the Bega River flowing around and encompassing the Proposal Area with floodplain elements of the Bega River to the east and west. Local relief within the Project Area varies, with elevations of 10 - 110 m Australian Height Datum (AHD).

The Mitchell Landscapes identify there are three landscapes that are present within the Project Area, these are outlined below.

Table 5-1 Description of the Mitchell Landscapes relevant to the Project area (DECC 2002:130).

Mitchell Landscape	Description (DECC 2002)
SEC Coastal Ranges: Bega Granites (Beg)	<p>Depressed basin of rolling hills and wide sandy or swampy valleys with dendritic drainage below the Great Escarpment on a large batholith of Silurian-Devonian granite and granodiorite.</p> <p>Rounded tors and rock outcrop common near the granite margin where a metamorphic contact ridge with steep slopes is found. Coarse uniform sands on steep slopes grade to red and yellow gritty texture-contrast</p>

	soils on the central hills and slopes and deep, dark organic sands in the swampy valley floors. Streams often incised and carry abundant coarse sand as bedload.
SEC Coastal Ranges: Bega Coastal Alluvium (Bea)	Channel, floodplain and terraces of the widening alluvial valley of Quaternary alluvium of the Bega River from the coast to the base of the Great Escarpment. Extensive freshwater swamps and billabongs.
SEC Coastal Ranges: Bega Coastal Foothills (Bfh)	Low hills with general slope toward the coast on Ordovician quartzite, slate, chert, phyllite. Thin stony red and red-yellow texture contrast soils.

5.2.1 Soils

The formation and nature of soils within the Project Area can provide insight into the types of sites which may be present, in addition to the likelihood for intact archaeological deposits to be present.

A search of the eSpade database noted that the majority of the Project Area falls within the Lower Brogo soil landscape, with areas of Brogo Pass, Penooka Swamp and Numbugga-Buckajo Swamps soil types.

Below provides a descriptions of soil landscapes in the Project Area accessed from eSpade of the dominant soil materials associated with the soil landscapes within which the Project Area and surrounding landforms are located.

Table 5-2 Descriptions of soil landscapes in the Project area (eSpade).

Soil Landscape	Description
Lower Brogo (lb)	Brownish black sandy loam A1 horizon topsoil, sand medium to coarse, pH 6-6.5 over bleached massive sandy loam A2 horizon, includes clayey sand and some sandy loam, coarse sand, pH 6-6.5 with a reddish brown sandy clay loam B2 horizon sand coarse, clay light to medium pH 5.5-7, C horizon dull yellowish brown clayey coarse sand pH 5.5-7.
Numbugga-Buckajo Swamps (nb)	Brownish black sandy clay loam A1 horizon, occasionally loam pH 6-6.5 over B1 horizon of brown coarse sand, gritty sand to clayey sand pH 6-7.
Penooka Swamp variant (psa)	Deep (>150cm) brownish black clay, light to medium, pH 6.5-7 A horizon; grey clay, medium pH 6.5-7. Psa variant brown clayey sand, associated with back swamps of the Bega, Brogo Bemboka Rivers floodplains.
Brogo Pass (bp)	Brownish black fine sandy loam A horizon fine sandy clay loam to clay loam over reddish brown rocky self mulching light clay pH 5-6; varies of A horizon brownish black light clay light clay to clay loam pH 6.5-7.

5.2.2 Hydrology

The Bega River flows to the immediate west of the Project Area and wraps around the Project Area to the north and east approximately 1 km from the Project Area. Floodplain landforms associated with the Bega River are broadly present in the western extent of the Project Area and intrude to a lesser degree from the east. Many unnamed tributaries of the Bega River cross the Project Area including the more permanent Parbery Creek (a 4th order watercourse) which flows from the Princes Highway east to the Bega River. Such water sources and adjacent relatively flat ground would have provided attractive terrain and ideal conditions for Aboriginal people living in the area with gentle gradient elevated areas also accessible during flood events.

There are also substantial wetlands and swamps present associated with the Bega River floodplain, particularly in the north western and western part of the Project Area. These would have also provided substantial resources of food and materials for people living in the area.

5.2.3 Flora and fauna

The Mitchell Landscapes classification of the Project area also contains a summary of the relevant vegetation present within the landforms.

Table 5-3 Description of the vegetation from Mitchell Landscapes relevant to the Project area (DECC 2002:128-130).

Mitchell Landscape	Description (DECC 2002)
SEC Coastal Ranges: Bega Granites (Beg)	Streams often incised and carry abundant coarse sand as bedload. Mostly cleared formerly open woodland with forest red gum (<i>Eucalyptus tereticornis</i>), rough-barked apple (<i>Angophora floribunda</i>) and grasses.
SEC Coastal Ranges: Bega Coastal Alluvium (Bea)	Extensive freshwater swamps and billabongs, stunted grey mangrove (<i>Avicennia marina</i>) at the mouths of estuaries. Small patches of temperate rainforest with sassafras (<i>Doryphora sassafras</i>) and lilly pilly (<i>Acmena smithii</i>) in gully heads and as a gallery forest along major streams in sheltered locations.
SEC Coastal Ranges: Bega Coastal Foothills (Bfh)	Open forest of tall spotted gum (<i>Corymbia maculata</i>), grey ironbark (<i>Eucalyptus paniculata</i>), red bloodwood (<i>Corymbia gummifera</i>), white stringybark (<i>Eucalyptus globoidea</i>), blackbutt (<i>Eucalyptus pilularis</i>) with blady grass (<i>Imperata cylindrica</i>), bracken (<i>Pteridium esculentum</i>) and burrawang (<i>Macrozamia</i> sp.) in the understorey, shrubs limited.

5.2.4 Landscape context

Most archaeological surveys are conducted in situations where there is topographic variation, and this can lead to differences in the assessment of archaeological potential and site modelling for the location of Aboriginal objects. Characteristics of the landscape can lead to local variation in assessable archaeological potential of landforms within the landscape.

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Preliminary archaeological sensitivity mapping as shown in **Error! Reference source not found.** was developed when conducting the due diligence assessment to identify landforms and areas of high, moderate and low archaeological sensitivity (see Table 5-4 Heritage constraint categories.

) and the Aboriginal heritage constraints within the Project Area. This preliminary mapping may be used to inform the Bega Structure Plan however it must be noted that this modelling has not been ground truthed as no visual inspection was undertaken at this stage of the Planning Proposal.

The archaeological sensitivity/ Aboriginal heritage constraints categories have been defined in terms of site size and significance, with the term 'large' referring to an archaeological site covering an extensive area and/or containing a high density of artefactual material, and 'significance' referring to the importance of the site for scientific/research potential and/or the cultural significance to the local community.

Table 5-4 Heritage constraint categories.

Constraint	Definition
Low (Green)	Low potential to encounter large and significant sites and therefore minimal impacts anticipated on Aboriginal Heritage. At a minimum a visual inspection is required as part of a Due Diligence Assessment.
Moderate (Orange)	Moderate potential to encounter large and significant sites. Impacts should be minimised, where possible. Further assessment and visual inspection required.
High (Red)	High potential to encounter large and/or significant sites. Avoid if possible. Further assessment and visual inspection required.

It has been established through the desktop assessment that the Project Area is located within a landscape that has the potential for the presence of Aboriginal cultural material to occur across its extent, albeit in various degrees of sensitivity. A number of Aboriginal sites have also previously been recorded within or adjacent to the Project Area, specifically in the south-eastern most portion of the Project Area which has previously been subject to archaeological assessment and a subsurface test excavation programme. Given this, it is likely that Aboriginal objects will occur in similar landforms and densities across the Project Area which would be impacted by any future development works. As a general statement, the areas that residential developments prioritise for the placement of dwellings and roads, were also prioritised by Aboriginal peoples in the past for their activities and evidence of this occupation in the form of Aboriginal objects is likely to be encountered across the Project Area.

Based upon the previous archaeological investigations of the local area and the currently recorded AHIMS sites there is potential for a range of site types, in particular PADs, artefact scatters and isolated stone artefacts to occur within the Project Area. Modified trees and ceremonial sites also have potential to occur within the Project Area.

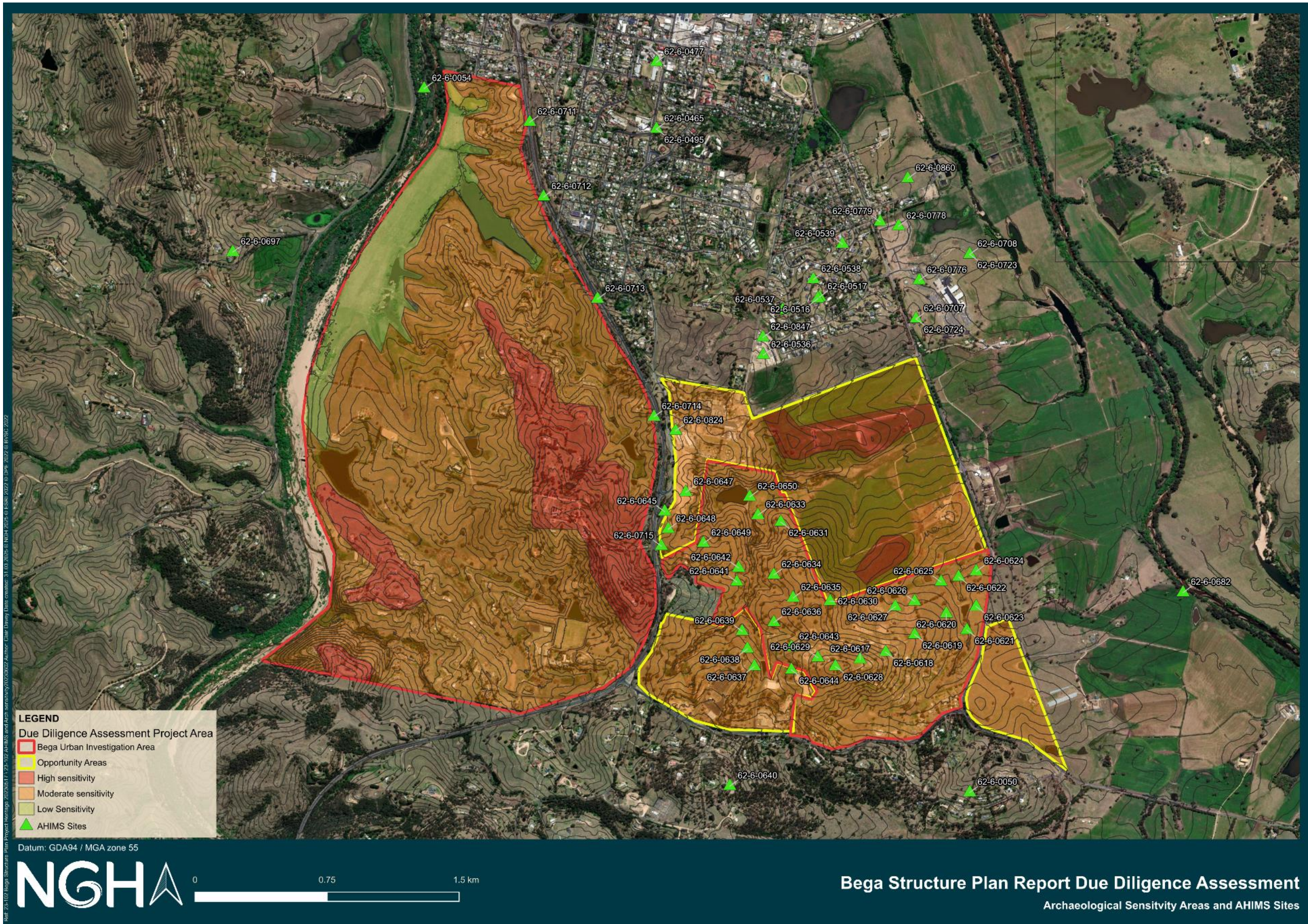


Figure 5-1 DEM and landforms within the Project Area (from due diligence assessment NGH 2023).

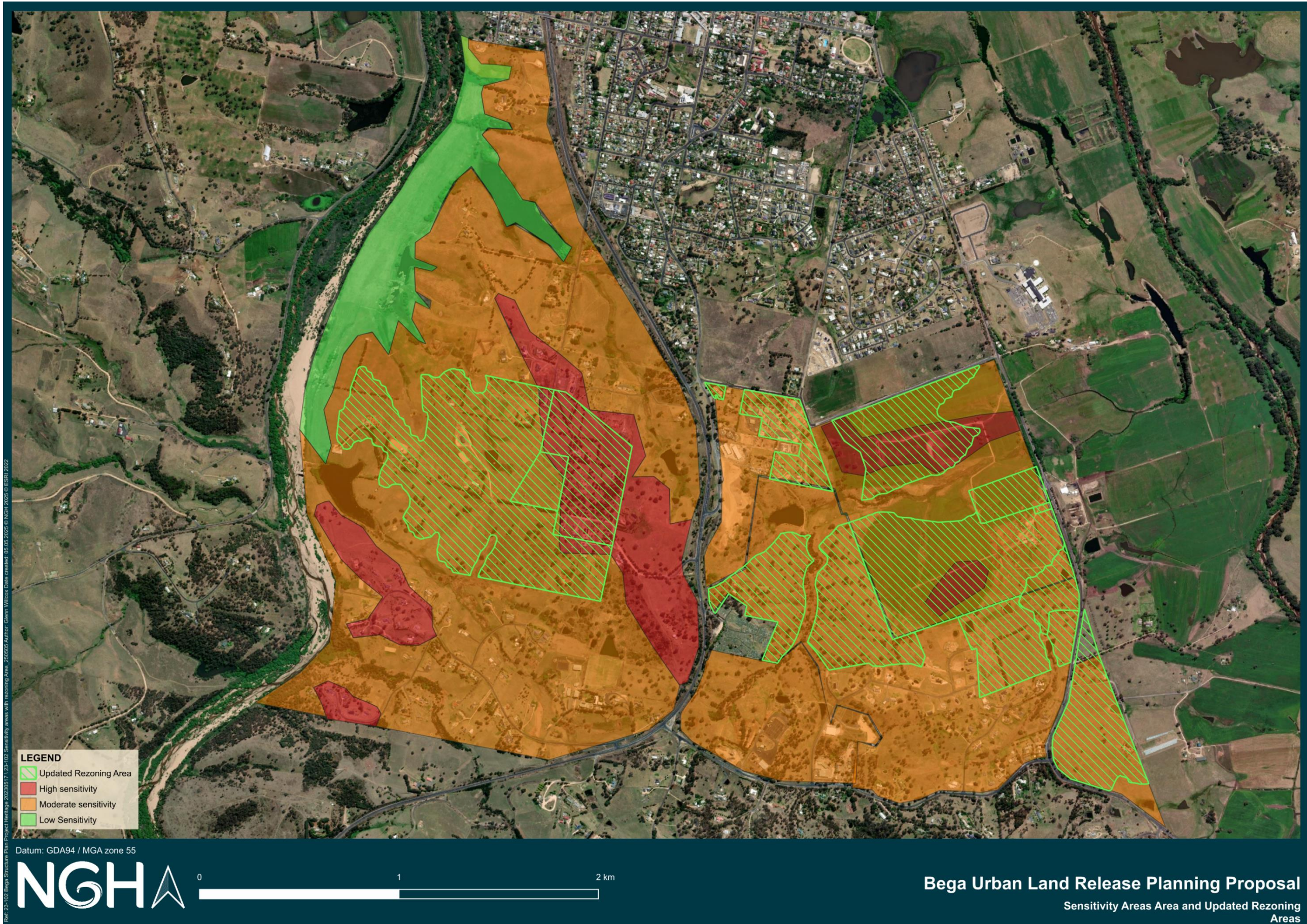


Figure 5-2 Archaeological sensitivity areas and updated rezoning areas

5.2.5 Summary of archaeological context and site location model

The results of these previous archaeological assessments which intersect and/or are located in close proximity to the Project Area, both surface survey and subsurface test excavations, concluded that the Project Area has a landscape with limited evidence of Aboriginal occupation.

While some of the Project Area has been disturbed and includes steep slopes, which have low archaeological sensitivity, there are some gentle hillside slopes and flat areas within the Project Area which have potential for Aboriginal objects to be present. Furthermore, there are likely some mature native trees within the Project Area which may have been subject to cultural modification.

Based on the information for the environmental context and results of previous archaeological studies in and around the Project Area and local area, several predictive modelling statements can be made. They are included in Table 5-5 Aboriginal site prediction statements.

Table 5-5 Aboriginal site prediction statements.

Site Type	Site Description	Potential
Stone artefacts scatters and isolated artefacts	Artefact scatter sites can range from high-density concentrations through to isolated finds	Artefact scatters have potential to occur in low to moderate densities on low gradient spur crests and slopes and elevated flats in close proximity to drainage lines and drainage line convergences. Simple slopes are likely to contain very low or low artefact densities while flatter elevated landforms could contain moderate to high artefact densities. Such sites have potential to occur within the Project Area and this site type has been previously recorded within the Project Area.
Potential Archaeological Deposits (PADs)	Potential subsurface deposits of archaeological material	Potential to occur within Project Area in areas of elevated, flat, dry land associated with water sources and on ridges, spurs, crests and low gradient slopes in proximity to drainage lines. Such sites have potential to occur within the Project Area and this site type has been previously recorded within the Project Area.
Burials	Burials sites exist throughout New South Wales and can be revealed during construction	While there is low potential for this feature to occur, sandy landforms or areas with deep floodplain deposits occur and

	work or become exposed through erosion.	thus there is some potential for burial to be present, although it is difficult to predict their location or density.
Modified trees	Trees that have undergone cultural modification	Potential to occur within the Project Area where there are remnant mature native trees. May occur in stands of remnant vegetation or as isolated paddock trees.
Ceremonial ring	Raised earth ring(s) associated with ceremony.	Such sites have potential to occur within the Project Area

5.2.6 Limits on information

The AHIMS database is a record of those places that have been identified and had site cards submitted to the database. It is not a comprehensive list of all places in NSW as site identification relies on an area being surveyed as well as the submission of correct site forms to AHIMS. There are likely to be many areas within NSW that have yet to be surveyed and therefore have no sites recorded. However, this does not mean that sites are not present.

While there have been some archaeological investigations in the local Bega area, it is noted that the information relating to site patterns, their age, and geomorphic context in the region is little understood. Furthermore, archaeological assessments have primarily been driven by development projects or linear infrastructure projects (i.e., road corridor) which often do not provide a significant sample size to the overall archaeological record, instead providing dense results in very specific areas. The robustness of the AHIMS survey results is therefore considered to be only moderate for the current assessment.

Archaeologists also rely on Aboriginal parties to divulge information about places with cultural or spiritual significance in situations where non archaeological sites may be threatened by development. To date, NGH has been provided some information about the presence of important cultural places. Further consultation and field investigations will be required to identify these places.

6. Archaeological investigation results

No field surveys have been undertaken for this project to date.

Field surveys will be conducted in the future, based on identified project areas and development applications by relevant proponents and may be undertaken during later stages of this planning project.

7. Cultural heritage values and Statement of Significance

7.1 Assessment criteria

The assessment of the significance of Aboriginal archaeological sites is currently undertaken largely with reference to criteria outlined in the ICOMOS Burra Charter (Australian ICOMOS 2013).

Any future field surveys that identify heritage sites and places will assess significance in accordance with the Burra Charter. Criteria used for assessment are:

- **Social or Cultural Value:** In the context of an Aboriginal heritage assessment, this value refers to the significance placed on a site or place by the local Aboriginal community – either in a contemporary or traditional setting.
- **Scientific Value:** Scientific value is the term employed to describe the potential of a site or place to answer research questions. In making an assessment of scientific value issues such as representativeness, rarity and integrity are addressed. All archaeological places possess a degree of scientific value in that they contribute to understanding the distribution of evidence of past activities of people in the landscape. In the case of flaked stone artefact scatters, larger sites or those with more complex assemblages are more likely to be able to address questions about past economy and technology, giving them greater significance than smaller, less complex sites. Sites with stratified and potentially in situ sub-surface deposits, such as those found within rock shelters or depositional open environments, could address questions about the sequence and timing of past Aboriginal activity, and will be more significant than disturbed or deflated sites. Groups or complexes of sites that can be related to each other spatially or through time are generally of higher value than single sites.
- **Aesthetic Value:** Aesthetic values include those related to sensory perception and are not commonly identified as a principal value contributing to management priorities for Aboriginal archaeological sites, except for art sites.
- **Historic Value:** Historic value refers to a site or place's ability to contribute information on an important historic event, phase or person.
- **Other Values:** The Burra Charter makes allowance for the incorporation of other values into an assessment where such values are not covered by those listed above. Such values might include Educational Value.

8. Proposed activity

The development proposals are to be determined in the future and will be subject to assessment of impacts to Aboriginal heritage. Proposed activities in the establishment of the subdivision and subsequent construction of roads, services and dwellings and other buildings are yet to be fully determined and it is anticipated that separate Development Applications (DA) will be lodged for each stage of this residential development.

All sections within this ACHA will be completed once development proposals are known.

8.1 Assessment of harm

8.2 Impacts to values

8.3 Consideration of ESD principles

9. Avoiding or mitigating harm

9.1 Unexpected finds

9.2 Aboriginal cultural heritage acknowledgement

10. Recommendations

The recommendations are based on the following information and considerations:

- Results of the current desktop Aboriginal archaeological assessment of the Project Area;
- Consideration of results from archaeological assessments which have previously been undertaken within and in close proximity to the Project Area;
- Consideration of results from other regional archaeological studies;
- Results of consultation with the registered Aboriginal parties;
- Appraisal of the proposed development; and
- Legislative context for the development proposal.

It is recommended that:

1. Detailed and comprehensive field surveys are to be completed to assess the presence, extent, character and significance of any sites present prior to any ground disturbance works occurring. Surveys should aim to provide sufficient information to enable development and planning decisions to be made to avoid or limit the possible impacts on Aboriginal cultural heritage sites and places. This includes survey of all landforms to confirm the sensitivity modelling. The surveys must form part of an updated ACHA to complete the assessment outlined in this report.
2. Consideration should be given to undertaking preliminary field inspection of key parts of the Project Area to ground truth the sensitivity modelling prior to the rezoning. This would enable informed decision to be made regarding the rezoning proposal and possible heritage impacts.
3. Aboriginal consultation with the RAPS should be maintained. Communication with the RAPs must be conducted at a minimum of every six months to be considered as continuous consultation.
4. As part of the continued consultation, discussion should be had regarding the management of any cultural material collected or salvaged from the Project Area when necessary.
5. Any field surveys should be undertaken with representatives of the Aboriginal community.
6. The BVSC should consider opportunities for the development to engage with and acknowledge the Aboriginal occupation and use of the area within and throughout the Project Area. Any interpretive material regarding Aboriginal occupation and significance of the wider region should be developed in consultation with the local Aboriginal community.

Bega Valley Shire Council is reminded that it is an offence under the *NSW National Parks and Wildlife Act 1974* to harm an Aboriginal object without a valid approval.

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Appendix A Consultation documentation

Consultation log

Consultation log redacted from public versions of the report – Available upon request

Interest Notifications

Registration notification letters and Public Notice advert– Available upon request

Correspondence

Correspondence redacted from public versions of the report – Available upon request



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