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## Manufactured Housing Estate Carrs Drive, Yamba, NSW

Aboriginal Cultural Heritage Assessment

Written for Clifton Yamba Land Pty Ltd

Everick Heritage Pty Ltd



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## Report Reference:

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## Executive Summary

The following is a report detailing the results of an Aboriginal Cultural Heritage Assessment ('ACHA') for the proposed Manufactured Housing Estate ('MHE') development at Yamba, NSW ('the Project'). The lands subject to assessment comprise Lot 2 DP 733507 and part Lot 3 DP 733507 at 104 & 120 Carrs Drive, Yamba, New South Wales ('NSW') (the 'Project Area'). It is understood the Project requires an Aboriginal cultural heritage assessment in support of a Development Application ('DA') to be submitted to Clarence Valley Council for approval.

The methods used for this assessment are in compliance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010) ('CoPAI') and all relevant legislation as described in Section 2 of this Report. The following are the broad requirements for compliance with the CoPAI;

- a) consultation with the Yaegl Traditional Owners Aboriginal Corporation ('TOAC');
- b) searches of applicable heritage registers;
- c) review of ethnographic and historic resources relevant to the region;
- d) review previous archaeological work and the landscape context;

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- e) summarise the local and regional character of Aboriginal land use and its material traces;
- f) formulate a predictive model;
- g) conduct an archaeological survey with representatives of Yaegl TOAC to identify the potential for harm to Aboriginal objects and appropriate management response; and
- h) report on findings and recommended management strategies.

The ACHA has been commissioned to support the proposed MHE residential development at 104 & 120 Carrs Drive, Yamba (the 'Proposed Works') (Figure 1). The subdivision layout involves the following components (see also Figure 2):

- 212 residential manufactured housing allotments of varying sizes;
- Bio-retention basins;
- Internal roads;
- Sub-surface electrical and sewerage amenities; and
- Landscaping.

As a result of the desktop study, field inspection and consultation with Yaegl TOAC the following can be concluded:

- a) No Aboriginal sites were identified within the surveyed section of the Project Area.
- b) The revised locations for the Yamba C1 and Yamba C2 middens (Everick 2011) report indicates both the C2 site is within or beside the environmental protection area to the west of the proposed footprint of the MHE development. The C1 site is further north along Oyster Channel.
- c) Vegetation comprises predominantly juvenile *Melaleuca* spp. that has overgrown most of the area of the Proposed Works in the last 5 years. Few mature *Melaleucas* remain and none that were surveyed were noted to have cultural modification. South of the Lot 3 house pad, the vegetation comprises a more mixed variety of regrowth *Casuarina* and Oak with some remnant matures.
- d) The cleared house pad / grassed area comprising 104 Carrs Drive (Lot 3) has been subject to the introduction of fill that has raised the

No Aboriginal sites were identified within the Project Area and the C2 midden is known to be located to the west of the environmental protection area.

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ground surface above the original swampland surface level by approximately 1 m. It is inferred that the soil profile of this area would likely comprise fill overlying original swampy ground surfaces and topsoil deposits. This would be consistent with the findings of the Everick (2011) report which stated the West Yamba (Carrs Drive) area was, drained, cleared and filled by European settlers to overcome the coastal swampland conditions for farming.

- e) It was generally agreed that midden material, if present would more likely be located within 80 metres of the Oyster Channel bank. However, Ken and Shane noted that midden material has been found further east of the Oyster Channel to the south of the Project Area and on Goldings Lane to the east. Low elevated aeolian sand dunes associated with the former coastline have the potential for midden material as these formed islands throughout the swampland.
- f) Ken Laurie remembers the property as being predominantly used for cattle and believes vegetation would have been removed by bulldozer before fill was subsequently scattered to create a new surface.
- g) Due to the level of ground-surface disturbance, lack of surveyable area and limited GSV, it was the conclusion of the Yaegl TOAC sites officers that Aboriginal spotters should be on-site during ground disturbing works for topsoil removal and installation of water retention basins. The objective of the monitoring program would be to identify any former mid-Holocene sand dunes that might occur through the area of the Proposed Works but have been levelled by historic agriculture.
- h) Test excavations are not deemed to be required as per Section 3 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010) due to the level of disturbance and the lack of proximity of ground disturbing works to a previously recorded midden. This opinion is supported by the Yaegl TOAC representatives preferring on-site monitoring of any potential shell material that be encountered by development of the estate.

## RECOMMENDATIONS

The assessment has concluded that ground disturbing works, being the MHE allotments, bio-retention basins, underground services and interior roads are

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unlikely to impact on Aboriginal objects and will not impact on any known places or sites of cultural significance to the Aboriginal community. As such additional consultation and archaeological investigation is not required. However, the following recommendations are provided as a precautionary measure to mitigate impacts to potential Aboriginal heritage values.

## Recommendation 1: Aboriginal Objects Find Procedure

It is recommended that if suspected Aboriginal material has been uncovered because of development activities within the Project Area:

- a) work in the surrounding area is to stop immediately;
- b) a temporary fence is to be erected around the site, with a buffer zone of at least 10 metres around the known edge of the site;
- c) an appropriately qualified archaeological consultant is to be engaged to identify the material; and
- a) should the works be deemed to have harmed the Aboriginal objects the Heritage NSW should be notified immediately via the EPA Enviro Hotline.

Having consideration for the outcomes of the ACHA it is recommended that Aboriginal sites monitors from Yaegl TOAC are engaged as “cultural heritage spotters” for ground disturbing works of original topsoils below the extent of the European fill layer.

It is recommended that an Unexpected Find Procedure is implemented

## Recommendation 2: Aboriginal Human Remains

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

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## DEFINITIONS

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

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

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

**ACHA** means Aboriginal Cultural Heritage Assessment.

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

**AHIMS** means Aboriginal Heritage Information Management System.

**AHIP** means Aboriginal Heritage Impact Permit.

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

**DECCW** means the Department of the Environment, Climate Change, and Water (NSW).

**Due Diligence Code** means the Due Diligence Code for the Protection of Aboriginal Objects in NSW (2010).

**LEP** means Local Environment Plan.

**MHE** means Manufactured Housing Estate.

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

**NPWS** means the National Parks and Wildlife Service.

**NSW** means New South Wales.

**Project Area** means Lot 2 DP 733507 and part Lot 3 DP 733507 at 104 & 120 Carrs Drive, Yamba, NSW.

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**Proponent** means the Clifton Yamba Land Pty Ltd and all associated employees, contractors and subcontractors of the same.

**Proposed Works** means the proposed Manufactured Housing Estate ('MHE') development at Carrs Drive, Yamba, NSW.

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

## 1. INTRODUCTION

### 1.1. Scope of this Assessment

The following is a report detailing the results of an Aboriginal Cultural Heritage Assessment ('ACHA') for the proposed Manufactured Housing Estate ('MHE') development at Yamba, NSW ('the Proposed Works'). The lands subject to assessment comprise Lot 2 DP 733507 and part Lot 3 DP 733507 at 104 & 120 Carrs Drive, Yamba, New South Wales ('NSW') (the 'Project Area'). The ACHA will be used to support of a Development Application ('DA') to be submitted to Clarence Valley Council.

### 1.2. Assessment Methodology

The methods used for this assessment are in compliance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010) ('CoPAI') and all relevant legislation as described in Section 2 of this Report. The following are the broad requirements for compliance with the CoPAI;

- a) consultation with the Yaegl Traditional Owners Aboriginal Corporation ('TOAC');
- b) searches of applicable heritage registers;
- c) review of ethnographic and historic resources relevant to the region;
- d) review previous archaeological work and the landscape context;
- e) summarise the local and regional character of Aboriginal land use and its material traces;
- f) formulate a predictive model;
- g) conduct an archaeological survey with representatives of the Yaegl TOAC to identify the potential for harm to Aboriginal objects and appropriate management response; and
- h) report on findings and recommended management strategies.

### 1.3. Project Description

The proposed MHE layout involves the following components (see also Figure 2);

- 212 residential manufactured housing allotments;
- Bio-retention basins;
- Internal roads;
- Sub-surface electrical and sewerage amenities; and
- Landscaping.

## 1.4. Report Authorship

The ACHA was prepared by Principal Consultant (Northern NSW) Tim Hill and Archaeologist Matt Finlayson. The Aboriginal community consultation was conducted by Tim Hill.



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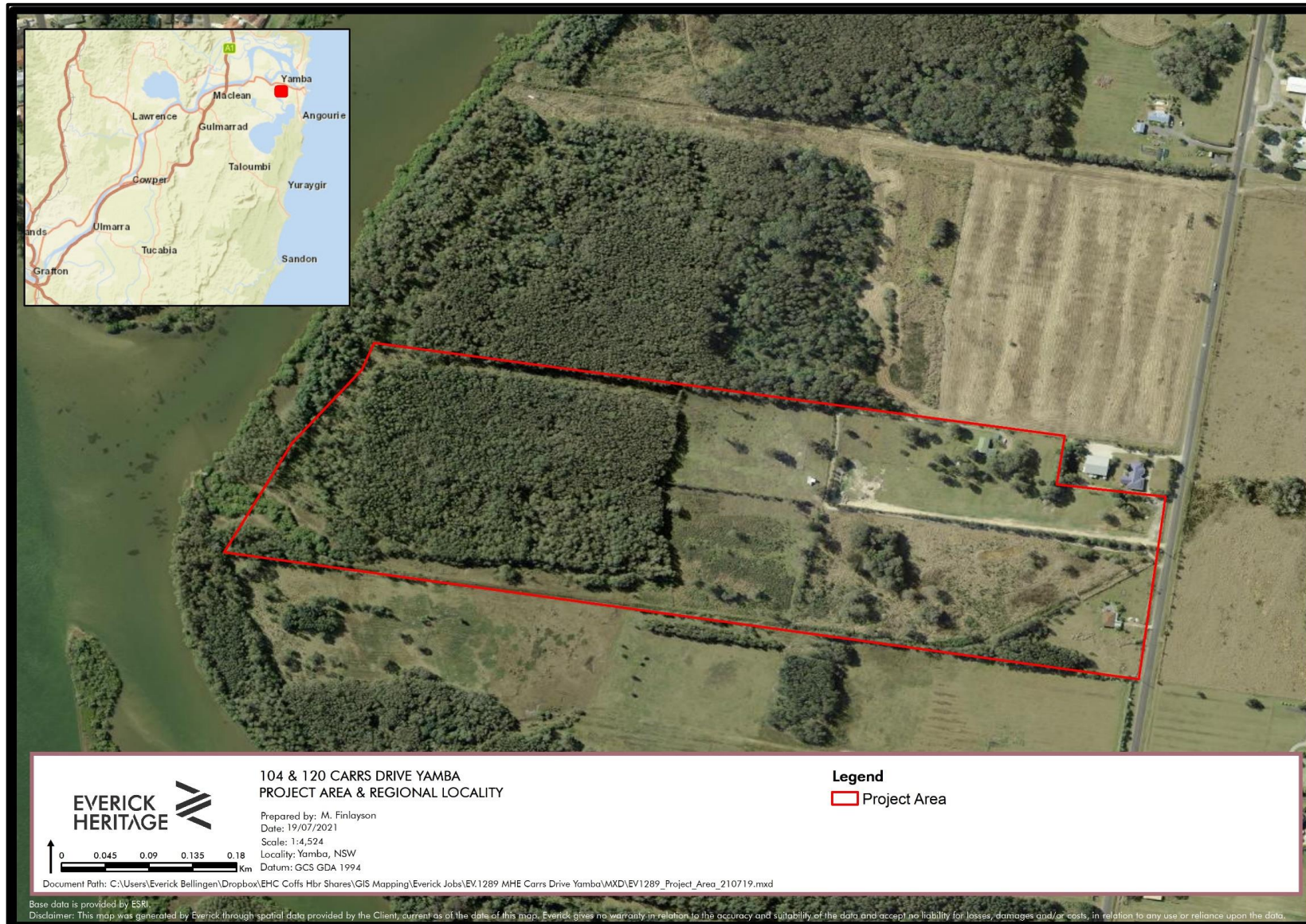


Figure 1: Location of Proposed Works.

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Figure 2:Proposed Lot and road access layout.



## 2. LEGISLATIVE AND PLANNING CONTEXT

The primary State legislation concerning cultural heritage in NSW is the National Parks and Wildlife Act 1974 (NSW) (NPW Act) and Local Environment Plans (LEP) made under the Environmental Planning & Assessment Act 1979 (NSW). The Commonwealth also has a role in the protection of nationally significant cultural heritage through the Environmental Protection and Biodiversity Conservation Act 1999 (Cth), The Protection of Movable Cultural Heritage Act 1986 (Cth) and the Historic Shipwrecks Act 1976 (Cth).

For the purposes of this assessment the State and local legislation are most relevant. The consent authority will be the Clarence Valley Council. The information below lists the legislative and policy framework within which this assessment is set.

### 2.1. The National Parks and Wildlife Act 1974 (NSW)

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

An Aboriginal Place is an area of particular significance to Aboriginal people which has been declared an Aboriginal Place by the Minister. The drafting of this legislation reflects the traditional focus on Objects, rather than on areas of significance such as story places and ceremonial grounds. However, a gradual shift in cultural heritage management practices is occurring towards recognising the value of identifying the significance of areas to Indigenous peoples beyond their physical attributes. With the introduction of the National Parks and Wildlife Amendment Act 2010 (NSW) the former offence provisions under Section 86 of 'disturbing', 'moving', 'removing' or 'taking possession' of Aboriginal Objects or Places have been replaced by the new offence of 'harming or desecrating'. The definition of 'harm' is 'destroying, defacing or damaging an Object'. Importantly, in the context of the management recommendations in this assessment, harm to an Object that is 'trivial or negligible' will not constitute an offence.

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

penalty will be set at \$275,000- or one-year imprisonment for individuals, while for corporations it will rise to \$1,100,000.

Where a land user has or is likely to undertake activities that will harm Aboriginal Objects, the Director General of Heritage NSW has a range of enforcement powers, including stop work orders, interim protection orders and remediation orders. The amended regulations also allow for a number of penalties in support of these provisions. The NPW Act also now includes a range of defence provisions for unintentionally harming Aboriginal Objects:

- a) Undertaking activities that are prescribed as 'Low Impact'.
- b) Acting in accordance with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW (2010) (the 'Due Diligence Code').
- c) Using a consulting archaeologist who correctly applies the CoPAI.
- d) Acting in accordance with an AHIP.

The regulations allow for a range of low impact activities to be undertaken without the need to consult the Heritage NSW or a consulting archaeologist. Generally, those who undertake activities of this nature will not be committing an offence, even if they inadvertently harm Aboriginal Objects. For the purposes of this assessment, it is not considered that the proposed management works are 'low impact activities'.

## 2.2. Due Diligence Code

The Due Diligence Code operates by posing a series of questions for land users before they commence development. These questions are based around assessing the potential for an area of land to contain Aboriginal Objects and previous ground disturbance. An activity will generally be unlikely to harm Aboriginal Objects where it:

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

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

## 2.3. The ACHCRP Guidelines (2010) and Community Consultation.

The ACHCRP Guidelines provide an acceptable framework for conducting Aboriginal community consultation in preparation for impacts to Aboriginal cultural heritage. Proponents are required to follow them where a Project is likely to impact on cultural heritage and where they require an Aboriginal Heritage



Impact Permit ('AHIP'). However, it has been standard practice to undertake consultation with Aboriginal sites officers from the Local Aboriginal Land Council ('LALC') to assist the proponent to understand their requirements for additional consultation which may include Elders Groups, native title applicant groups or other knowledge holders who might have a particular type of knowledge about an area.

The ACHCRP Guidelines typically take a minimum of 90 days to complete. However, in complicated Projects this period may need to be extended by several months. The Guidelines require public notice of the assessment, preparation of a proposed methodology, undertaking site meetings and excavations where required, the production of a draft report, which is distributed to the registered Aboriginal parties and the production of a final report.

Although not strictly required, a thorough consultation process will treat the ACHCRP Guidelines as a minimum standard of community consultation where impacts to Aboriginal objects cannot reasonably be avoided. Generally, consultants must go to further effort to identify the significance of a given site to the Aboriginal community. This will likely include undertaking additional site inspections if requested by Aboriginal stakeholders, fully resourcing the community by providing copies of past archaeological and environmental assessments in the region and meeting with community members to seek their opinions of the site.

## 2.4. The Clarence Valley Local Environmental Plan 2011

The Clarence Valley LEP 2011 provides statutory protection for items already listed as being of heritage significance (Schedule 5), items that fall under the ambit of the Heritage Act 1977 (NSW) and Aboriginal Objects under the National Parks and Wildlife Act 1974 (NSW). It aims to ensure best practice components of the heritage decision making process are followed.

Under the Clarence Valley LEP 2011, development consent is required from Clarence Valley Council for any of the following actions (Part 5.10.4):

- a) demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of a building, making changes to its detail, fabric, finish or appearance):
  - i. a heritage item,
  - ii. an Aboriginal object,
  - iii. a building, work, relic or tree within a conservation area,
- b) altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,

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- c) disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,
- d) disturbing or excavating an Aboriginal place of heritage significance,
- e) erecting a building on land:
  - i. on which a heritage item is located or that is within a heritage conservation area, or
  - ii. on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance
- f) subdividing land:
  - i. on which a heritage item is located or that is within a heritage conservation area, or
  - ii. on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.

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

- a) consider the effect of the proposed development on the heritage significance of the place and any Aboriginal object known or reasonably likely to be located at the place, and
- b) notify the local Aboriginal communities (in such way as it thinks appropriate) about the application and take into consideration any response received within 28 days after the notice is sent.

The Project Area is not identified as an item of environmental heritage (Schedule 5) under the Clarence Valley LEP (2011).

## 3. ABORIGINAL COMMUNITY CONSULTATION

The Aboriginal Cultural Heritage Guidelines for Proponents (DECCW 2010) act as a guide for conducting the community consultation process. The guidelines contain a number of minimum consultation standards, one of which requires the preparation of a methodology for conducting the Cultural Heritage Assessment. This methodology outlines the basic steps that need to be undertaken to determine the nature of the cultural heritage of the site, and the approaches required to manage that heritage.

Email correspondence and phone calls were made to Dianne Chapman, Administration Manager of Yaegl TOAC on 26 July 2021 to which an email response was received from Dianne on 29 July 2021 (see Appendix 1). An additional phone call was made with Uncle Bill Walker to discuss the proposal on 29 July 2021. The field survey was undertaken on 30 July 2021 with the following;

- Ken (Fox) Laurie (Director, Yaegl Knowledge Holder and Yaegl Senior Cultural Heritage Sites Officer); and
- Shane Eamens (Yaegl Senior Cultural Heritage Sites Officer).

Both men are experienced in the identification of Aboriginal sites and have extensive knowledge of Aboriginal cultural heritage within the Clarence Valley.

## 4. DESKTOP ASSESSMENT: ABORIGINAL CULTURAL HERITAGE

### 4.1. Environmental Context

#### 4.1.1. Topography and Hydrology.

The Project Area is located within the Oyster Channel catchment, being adjacent to the eastern bank of the channel within a saltwater estuarine floodplain (see Figure 5). The topography ranges from 3 to 5 m above sea level ('ASL') with the higher ground along the eastern boundary. The Oyster Channel is located immediately adjacent to the west of the Project Area and would have provided ample opportunity for exploitation of the saltwater estuarine environment of molluscan species and fish in addition to terrestrial swampland fauna.

The Project Area is located within the Iluka soil landscape as mapped by Morand (2011). The following summarizes the characteristics of the Iluka soil landscape:

**Table 1: Soil landscapes (Morand 2001)**

Soil Landscape	Description	Vegetation model
<b>Iluka (Morand 2001:166)</b>	<p><b>Landscape</b>—extremely low, level to gently undulating Quaternary (Holocene and Pleistocene) sand sheets. Low beach ridges are common on Holocene sand. Slopes 0 – 2%; relief 1 – 3 m; elevation 1 – 5 m. Mix of uncleared and cleared areas of open-forest and closed-forest (littoral rainforest).</p> <p><b>Landscape variant ila</b>—Holocene beach ridges; relief 1 – 3 m.</p> <p><b>Landscape variant ilb</b>—sand mass of uncertain origin.</p> <p><b>Soils</b>—deep (&gt;200 cm), well-drained Aeris Podzols (Humus Podzols) and deep (&gt;200 cm), poorly drained Aquic/Semiaquic Podzols (Humus Podzols). Deep (&gt;200 cm), well-drained Sesquic Aeris Podzols (Podzols) within landscape variant ila.</p>	A mix of uncleared and cleared open and closed-forest (littoral rainforest). Dominant trees include <i>Corymbia intermedia</i> (pink bloodwood), <i>Eucalyptus tereticornis</i> (forest red gum), <i>Corymbia gummifera</i> (red bloodwood), <i>E. planchoniana</i> (needlebark stringybark), <i>Lophostemon suaveolens</i> (swamp box), <i>Banksia integrifolia</i> var. <i>integrifolia</i> (coast banksia), <i>Acacia aulacocarpa</i> (brush ironbark wattle) and <i>Melaleuca quinquenervia</i> (broad-leaved paperbark). <i>Imperata cylindrica</i> (blady grass), <i>Lomandra longifolia</i> (mat-rush) and <i>Pteridium esculentum</i> (bracken) are common ground covers.

The Project Area was originally selected in 1912 by Mr Albert Carr for farmland (Mrs Garbet per comm. 1996). The area was originally described as comprising *Melaleuca* / *Casuarina* forest on coastal swampland, which was subsequently drained, and the trees removed to their roots (Everick 2011:35). As such, the existing vegetation in the West Yamba area is predominantly regrowth. Review of parish mapping of Yamba also indicates a former channel road existed on the western boundary of the Project



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Area on the bank of the Oyster Channel, starting at Somerset Place to the north, wrapping around the bank of the channel to Yuraygir and Angourie to the south (see Figure 3 and Figure 4).

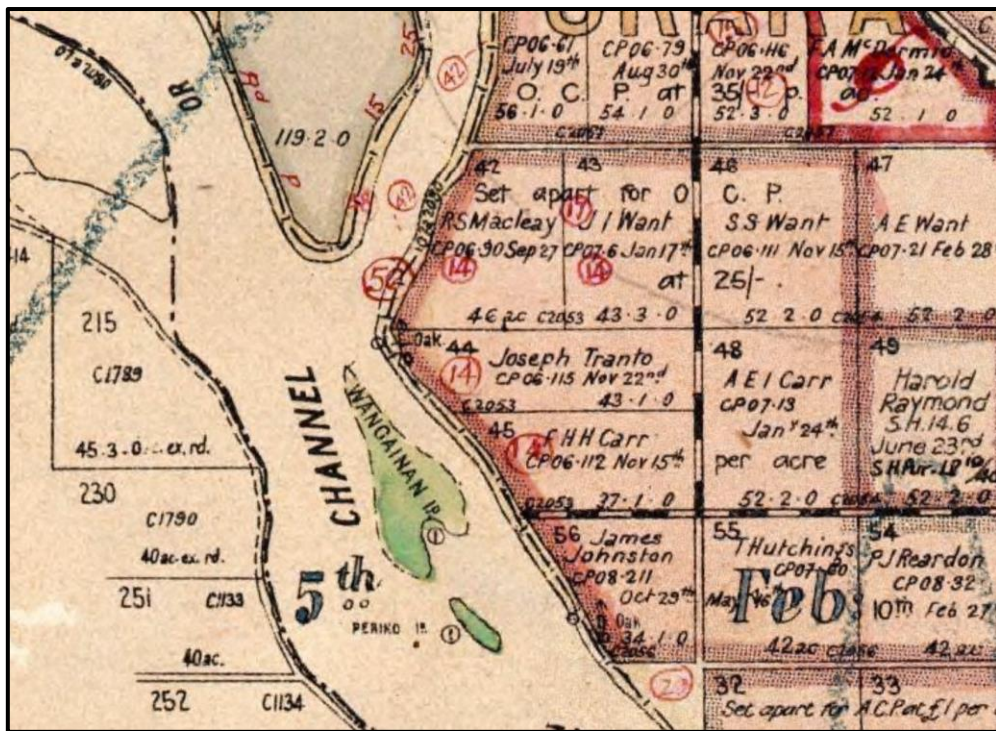


Figure 3: 1915 parish of Yamba map of the Project Area (source NSWLRS).

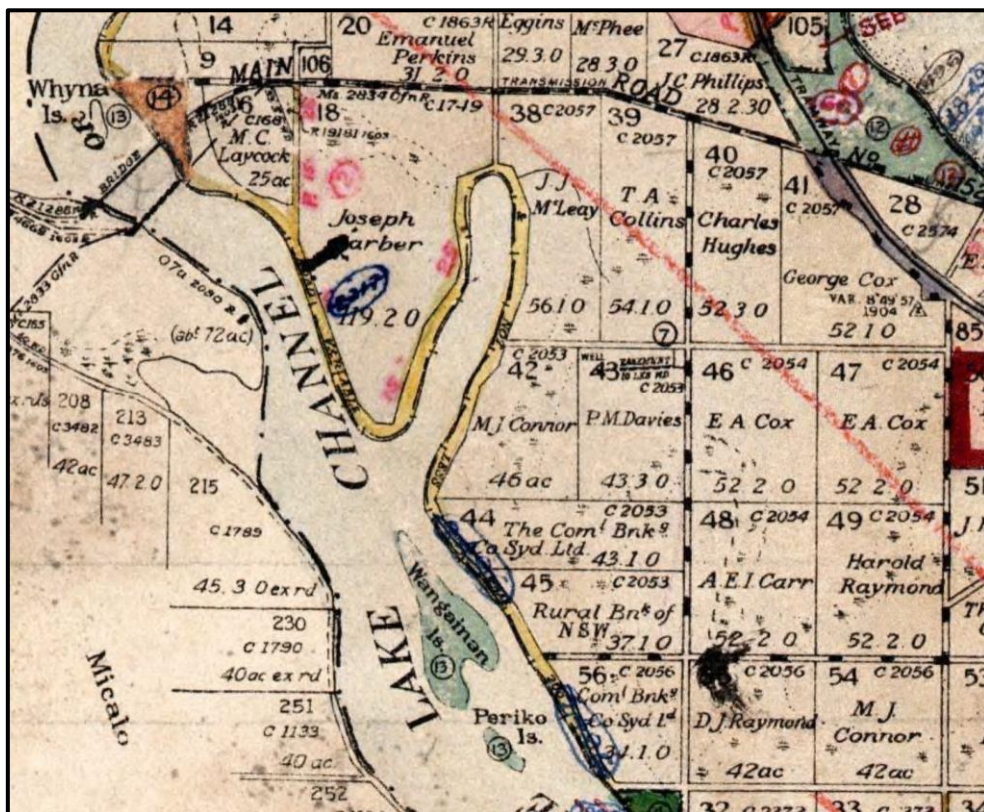


Figure 4: 1944 parish of Yamba map of the Project Area (source NSWLRS).

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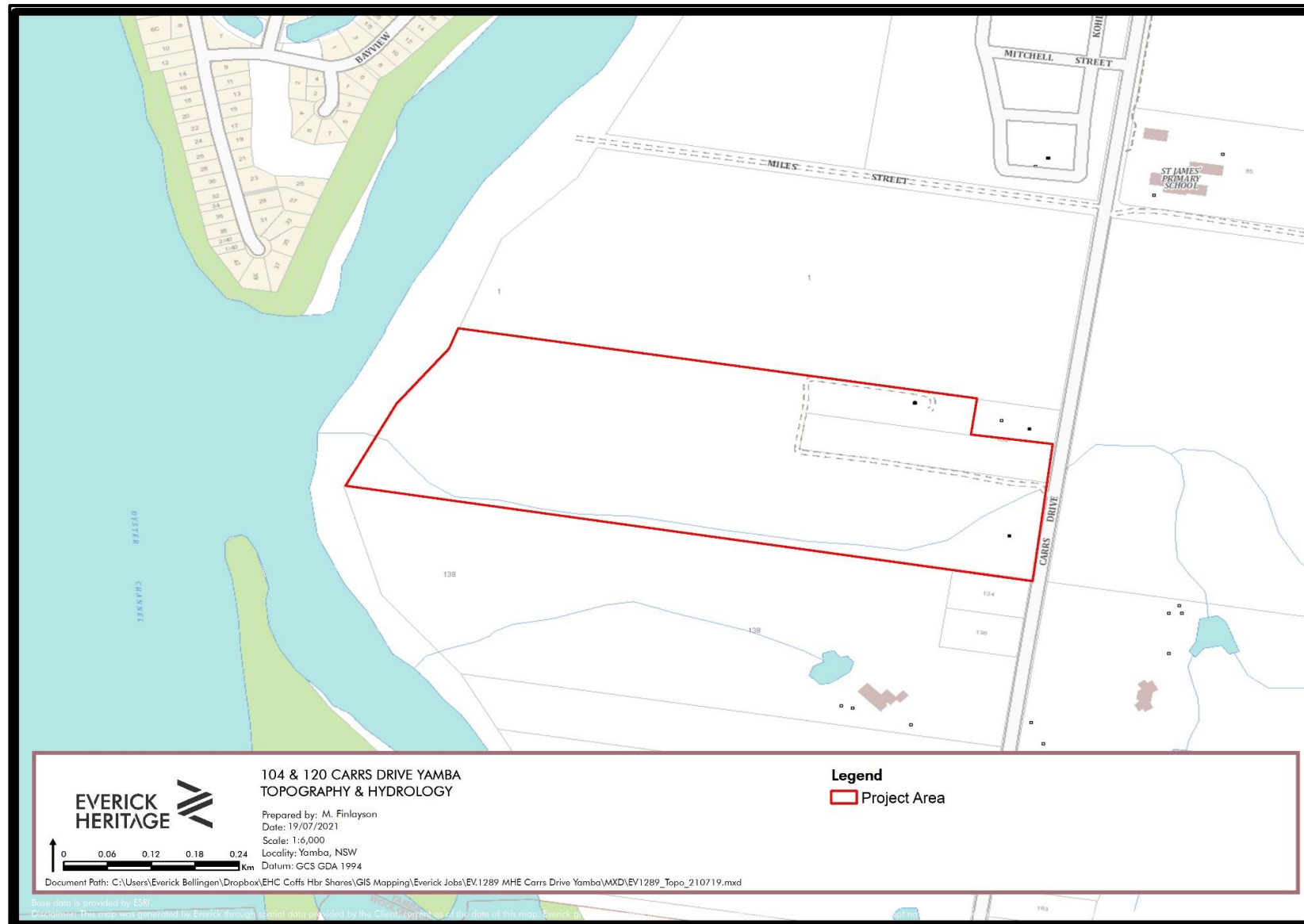


Figure 5: Topography and hydrology of the Project Area.



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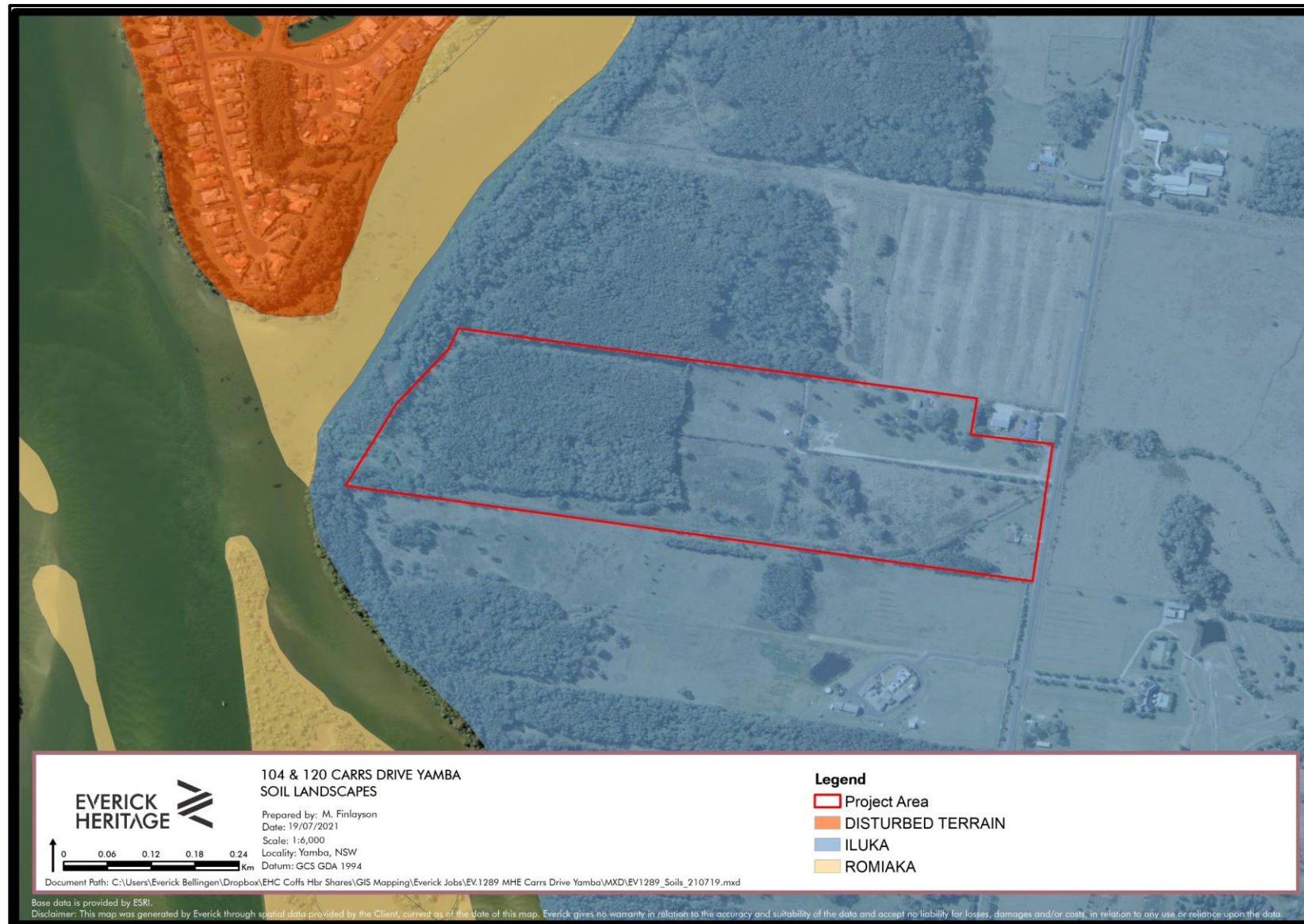


Figure 6: Soil landscapes of the Project Area.

## 4.2. The Aboriginal Heritage Information Management System (AHIMS)

Care should be taken when using the AHIMS database to reach conclusions about site prevalence or distribution. For example, a lack of sites in a given area should not be seen as evidence that the area was not occupied by Aboriginal people. It may simply be an indication that it has not been surveyed, or that the survey was undertaken in areas of poor surface visibility. Further, care needs to be taken when looking at the classification of sites. For example, the decision to classify a site as an Open Campsite containing shell, rather than a midden, can be a highly subjective exercise, the threshold for which may vary between archaeologists. There can also be errors with the data once it is entered onto the AHIMS database, including datum conversion errors.

An 'Extensive' search was undertaken of the AHIMS database (Reference: 607513) on 19 July 2021 (Appendix B). The search area was defined as Lot 2 DP 733507 with a buffer of 1 km. Three (3) results were returned, being the 'Golding Road Midden', 'Yamba C1' and 'Yamba C2' middens.

Golding Road Midden (13-1-0072) is within a cleared paddock adjacent to Golding Lane approximately 750 m northwest of the Project Area and is noted by Everick (2011) to have likely been partially destroyed as a result of road construction or maintenance. The location of Yamba C1 (13-1-0096) and Yamba C2 (13-1-0097) are noted as being on the eastern bank of the Oyster Channel, adjacent to the west of the Project Area, with Yamba C2 sitting on the western boundary (Figure 7). The sites have been converted from AGD to GDA coordinates, and as such may be inaccurate

**Table 2: AHIMS Registered Sites (Client Service ID 607513).**

Site ID	Site Name	Easting	Northing	Site Feature
13-1-0072	Golding Road Midden	532700	6743300	Shell; -, Artefact;-
13-1-0096	Yamba C1	531575	6743100	Shell; -, Artefact;-
13-1-0097	Yamba C2	531300	6743100	Shell; -, Artefact;-

## 4.3. Other Heritage Registers

The following heritage registers were accessed on 26 July 2021:

- **The National Heritage List (Australian Heritage Council):** Contains no Aboriginal heritage listings within or within close proximity to the Project Area.
- **Commonwealth Heritage List (Australian Heritage Council):** Contains no Aboriginal heritage listings within or within close proximity to the Project Area.

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- **The State Heritage Register:**
  - a) contains no Aboriginal heritage listings in Section 1 (Items listed under the NSW Act as Aboriginal Places) within or within close proximity to the Project Area;
  - b) contains no Aboriginal heritage listings in Section 2 (Items listed under the NSW Heritage Act) within or within close proximity to the Project Area;
  - c) contains no Aboriginal heritage listings in Section 3 (Items listed by Local Government and State Agencies) within or within close proximity to the Project Area.
- **Clarence Valley LEP (2011):** Contains no heritage items in proximity to the Project Area.
- **Register of the National Estate:** Contains no heritage items in proximity to the Project Area.





Figure 7: AHIMS Search Results (#607513) and revised locations (Everick 2011).



## 5. SELECTED ARCHAEOLOGICAL SYNTHESIS AND PREDICTIONS

### 5.1. Ethnohistory

The Aboriginal people of the lower Clarence River were part of linguistically and culturally associated groups called the Bundjalung, the coastal extent of which occupied the Clarence to Logan Rivers and west to the Dividing Range (Crowley 1978). Tindale (1974) recorded a Jiegera tribe occupying the Clarence River upstream to Grafton. Modern usage refers to the 'Yargir' (Yaegl) as the traditional Aboriginal occupants. Heron (1991) records that the 'Yargir' is more closely related to the southern Gumbaybggir than the Bundjaung, their territory extended south to Corindi Beach, west to Ulmara and north to the Clarence River including 98 of the 100 islands of the Clarence River (Heron 1991: 10). While 'Yargir' country is smaller than neighbouring territories, it is one of the richest in the region in terms of natural resources (Heron 1991: 16).

A review of sightings of Aboriginal coastal groups in Coleman's review of ethnohistorical sources led her to the conclusion that in the initial stages of European contact, observers of coastal groups described; '...consistently high, semi sedentary local populations on the coast with a highly sophisticated organic material culture which vanished almost overnight with European contact' (Coleman 1982: 7). Population densities for the lower Clarence are considered high, no doubt reflecting the wide variety of ecologies and hunting/gathering opportunities contained. Fry, Commissioner for Lands in the Clarence District, estimated the population for the Clarence as between 525 and 1,050 persons (Fry 1894 in Belshaw 1978), a density of one person per three to six square miles.

Later researchers consider that populations for the coastal plains and estuaries were much higher, at possibly one person per three square miles between the Clarence and Evans Rivers (Belshaw 1978: 730). In areas where marine and terrestrial foods were particularly abundant, which would apply to the lower Clarence, estimates may be placed even higher (Pierce 1978; Heron 1991). Population estimates by eye witnesses of Aboriginal numbers for the coastal regions, immediately after European settlement, are highly likely to be underestimates of pre contact numbers due to the impacts of diseases, particularly smallpox that spread throughout coastal groups prior to official settlement.

Land belonged to clan groups whose boundaries had been established in Yargir mythology (Creamer and Godwin 1984). Contact between local clans and more distant groups took place for the purposes of exchange, inter marriage, initiations, armed conflict and at times of seasonally abundant food supply. There are two current demographic models to describe possible settlement/movement patterns. One suggests that clan groups would range between the seacoast and the foothills of the coastal ranges on a

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seasonal basis (McBryde 1974). On ethno-historical evidence McBryde suggests that some seasonal movement was common and that the basic subsistence economy of hunting, fishing and gathering was neither static, nor completely migratory, but characterised by movement between the coast and the foothills (McBryde 1974: 337). A number of early references refer to seasonal movement on a limited scale including Ainsworth (1922) on the Richmond River, Dawson (1935: 25) and McFarlane (1934) on the Clarence River. Bray (1923) states that the Lismore 'tribe' used to go to Ballina at the mouth of the river. Sullivan (1976: 20) notes that inland groups were allowed to come to the Tweed coast for a time. The archaeological evidence for movement in the coastal river valleys is less conclusive (McBryde 1974: 338).

From the few eyewitness sources available for the North Coast, we can suggest that contact between members of the coastal clans was frequent and may have involved relatively large numbers. Bray records that the coastal Coodjinburra '...used to mix very much with the Ballina Richmond River Blacks' (Bray 1901:9). However, it may have been a way of life that rapidly disappeared under the impacts of disease and restrictions on Aboriginal groups by 'authorities' on the movement of Aboriginal people. A review of sightings of Aboriginal coastal groups in Coleman's review of ethno historical sources led her to a conclusion that in the initial stages of European contact, observers of coastal groups describe, '...consistently high, semi sedentary local populations on the coast with a highly sophisticated organic material culture which vanished almost overnight with European contact' (Coleman 1982:7).

McBryde (1974 and 1976) argues for a seasonal movement of people between the coast in summer exploiting marine foods and hunting inland in winter. On the ethno-historical evidence McBryde suggested that some seasonal movement was usual and that the basic subsistence economy of hunting, fishing and gathering was neither static, nor completely migratory, but characterised by movement between the coast and the foothills (McBryde 1974: 337). A number of early references refer to seasonal movement on a limited scale including Ainsworth (1922) on the Richmond River and Dawson (1935) and McFarlane on the Clarence River. Bray (1923) states that the Lismore 'tribe' used to go to Ballina at the mouth of the river. Sullivan (1964: 20) recorded that inland groups were allowed to come to the Tweed coast for a time. The archaeological evidence for movement in the coastal river valleys is less conclusive (McBryde 1974: 338).

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Figure 8: 'Group of Blacks, Clarence River' (Source J. W. Lindt AM Consulting 2015:25).



Figure 9: 'Camp of Australian Aborigines' (source F. Henningham 1935 source AM Consulting 2015:17).

## 5.2. Previous Archaeological Research

A broad outline of the known chronology of occupation of the immediate coastal zone between the Tweed and the Clarence Rivers is outlined below. The Aboriginal occupation of the Clarence region fits within the known chronology for the far North Coast. Coastal sites in northern N.S.W. date to within the Holocene period. The earliest of these is a shell midden at the base of Sexton Hill on the lower Tweed River where an occupation phase was dated between 4,700 BP and 4,200 BP (Appleton 1993:34). At Ballina a shell midden on Chickiba Creek was found to have accumulated between 1,750 BP and c.100 BP (Bailey 1975:52). Shell samples from the Angels Beach area are dated between 800 BP and 530 BP, with one sample at 900-1,000 BP (Rich 1994: 195). Stone artefacts were assessed on technological grounds to date to within the past 2,000 years (Rich 1994: 161). Bailey's basal date of 1,750 BP (1974) suggests that the modern resource-rich environment may not have been productive enough at an earlier time to support any more than small groups. In contrast, the Tweed River estuarine site was in use some 3,000 years earlier than this (Appleton 1993).

Beach foreshore sites investigated to date have been associated with more recent phases of occupation. Fore dune sites typically take the form of narrow bands of pipi shell, or surface scatters of pipi and stone artefacts. Pipi horizons at South Ballina and Broadwater have dated to 260 years BP and 200 years BP respectively (McBryde 1982: 77). A more substantial midden (AHIMS: #04-06-0061) investigated on the beach foreshore at Byron Bay had been used between approximately 1,000- and 400-years BP. The 80 cm deep midden deposit was overwhelmingly dominated by pipi shell, with minor inclusions of periwinkle, limpet, sand snail, oyster and cartrut. Bream was the most abundant vertebrate species. Although in lower quantities relative to bream, a broad range of fauna was represented in the midden, including other types of fish, tortoise, macropods, bandicoot, possums, rodents, birds and reptiles. The midden's stone assemblage was characterized by primary flaking debitage which reflected the poor knapping quality of the raw materials used. All of these materials are believed to have been collected from intertidal pebble beds adjacent to the site (Collins 1994).

The earliest dated coastal site in the Clarence area is the estuarine midden at Woombah, now located 10 km inland and 10.5 km southeast of the Project Area. The deposit indicated an occupation phase between c. 3260 BP and the contact period (McBryde 1974). The Woombah site had been the earliest known coastal occupation site in northern New South Wales until a shell midden excavation on the Tweed River indicated an occupation phase between 4,700 BP and 4,200 BP (Appleton 1993). At the Woombah site the bulk of shell remains were oyster (90%). Animal and fish bone were rare, suggesting that the economy was based almost entirely around the gathering of shellfish (McBryde 1974: 290). Few stone artefacts were represented. The stone kit consisted of unifaced pebble tools, perhaps used for preparing plant foods, ground edge axes, utilised flakes, some small, retouched tools and a few bone points (McBryde 1974: 290). The presence of glass artefacts indicated use of the site into the contact period. Despite the

high volume of shell, McBryde concluded the site represented a great number of short sporadic occupations of the site, seasonal visits lasting only a few months (McBryde 1974: 288). Bailey (1975) drew similar conclusions from his calorific research of the North Creek Ballina oyster middens. The oysters provided little more than a minor supplement to the diet and the middens could only have been amassed by large groups over a matter of days (Bailey 1975: 57-59).

Archaeological assessment by Piper of the northern approaches to the Mororo Bridge identified three sites of isolated artefacts on low spurs adjoining the floodplain. The materials were a scraper/core, a retouched flake and flakes all on siliceous materials (Piper 1991). An earlier archaeological assessment sampled the low foothills, floodplain and the dune fields adjacent to Iluka Road and the Clarence River. No Aboriginal sites were identified in the hills and sloped landform units (Piper 1982). Byrne's Heritage Study of the Maclean Shire identified the suite of sites, principally middens, between Wombah and Woody Head as worthy of Class 1 status, Complete Conservation, that if adopted required that all designated developments be preceded by archaeological surveys and all sites be retained (Byrne 1986).

Aboriginal cultural heritage assessments in relation to the Pacific Highway Upgrade Woolgoolga to Ballina, have been the most numerous comprehensive studies in this region, be it by necessity, in a narrow corridor of search and subsequent archaeological investigations. The Iluka Road to Woodburn assessment section resulted in seven Aboriginal heritage sites and two Potential Archaeological Deposits ('PAD') (both associated with existing sites) being located within or near the highway boundary i.e., the highway upgrade corridor. These included one scarred tree near New Italy (13-1-0111) and a burial area at Sawpit Creek south of New Italy (13-1-0059). In the vicinity of the Woodburn Interchange an artefact scatter and PAD (13-1-0112), an isolated artefact and a PAD (13-1-0115) as well as an isolated artefact (13-1-0113) were found. The PADs returned 11 mainly silcrete artefacts and three artefacts respectively from test pits on the spurs from the Richmond Ranges called the Tabbimobile rises (NSW RMS EIS 2012:50-54). The sites were assessed as being of moderate to high overall Aboriginal significance with exception of isolated artefacts 13-1-113 and 13-1-0114 which were deemed low (NSW RMS EIS 2013:56).

The Piper (1996) study in Yamba included oral statements provided from Mrs Garbet (nee Carr), the daughter of the original European settler circa 1912. Mrs Garbet described West Yamba including Carrs Road as comprising Melaleuca swampland that was cleared out and drained. Mrs Garbet also recalled her own father's recollections c. 1894:

"... Aborigines camped at the top of the lagoon, there is a Bora ring there and work their way down to micalo Island and across to Oyster Channel, crabbing, oystering, fishing etc. Then they would work their way across to the beach and back to the top of the lagoon ... " (Garbet pers comm. 1996).



Piper (1996) also surveyed two recorded middens, being the Yamba C1 and C2 middens, to the west of the Project Area on the Oyster Channel bank. Both middens were within eroding low mounds within forested areas with undergrowth. Yamba C1 comprised fragmented oyster shell in a 'humic' litter that had been disturbed by animals. The site was inferred to extend 20 m x 5 m parallel to the Oyster Channel, approximately 5 m above the high-water mark. No stone tools were evident in proximity to the site and no indication was given that the shell was of European origin from an Oyster Lease. Yamba C2 however, located to the south of C1 was denoted as comprising a mixture of oyster, cockle and whelk eroding from a mound 20 m from the high-water mark, with no stone tools in proximity to the site. Piper (1996) indicates C2 to be more likely to be an Oyster lease deposit, however, also infers that both middens could possibly be the result of road construction from dumping or creation of a track base. However, the testimony of Mrs Garbet as per above raises the possibility that both sites are connected with Aboriginal food gathering on the eastern bank of the channel (Piper 1996:30).

In 2011, Everick Heritage conducted a cultural heritage assessment for the 'West Yamba' residential project, encompassing part of the current Project Area. The report denotes the location of 'Yamba C2' midden on AHIMS as being inaccurate due to conversion of the coordinates from AGD to GDA, as is common to AHIMS mapping data across New South Wales.

## 5.3. Predictive Modelling

The most comprehensive 'regional' model for the area is provided by Godwin (1990) in a major review of the earlier archaeological research of Isabelle McBryde (1974). Godwin's model specifically investigates patterns of movement between the coastal, sub-coastal and tablelands (escarpment) areas. For the purposes of understanding the archaeological record the study area is considered to fall into the 'coastal' area. Godwin makes the following statement on settlement and movement along the coast;

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

It is likely that larger camps associated with relatively large coastal groups were situated on slightly elevated land nearby to the main river and estuary. While it is noted that the Project Area is within the tidal estuary, the low-lying nature of the land is not conducive to the discard and preservation of Aboriginal archaeological sites.

## 6. FIELD SURVEY: ABORIGINAL CULTURAL HERITAGE

### 6.1. Constraints to Site Detection

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

The constraints to site detection are almost always most influenced by post European settlement land uses and seldom by natural erosion processes. The area of surface exposure and the degree of surface visibility within exposed surfaces are usually the product of 'recent' land uses for example land clearing, ploughing, road construction, natural erosion and accelerated (manmade) erosion (McDonald et.al. 1990:92). In this case the major 'manmade' constraints to Aboriginal site survivability and detection are due to the following;

- Drainage of the former Yamba / West Yamba coastal swampland for farming;
- Removal of vegetation and replacement with sugar cane plantations and pasture for cattle;
- Removal of topsoil for access tracks and the existing dwelling; and
- Alluvial erosion as a result of seasonal inundation and flooding.

### 6.2. Site Inspection

To achieve as thorough and effective an archaeological assessment as possible a systematic ground survey of impacted sections of the Project Area was undertaken. The surface visibility was consistently low (10%), with grass cover, leaf litter, overgrown shrubbery and intermittent exposures across most of the Project Area. Exposures were generally limited to the area of fill surrounding the cleared house pad area and in vehicle / mud tracks on the northern boundary of the Project Area. GSV was approximately 10% through the Project Area. Vegetation generally comprises recent *Melaleuca* regrowth that has grown in the past 5 years, with few matures scattered through the Project Area that are likely at minimum 40 years old. Notably, vegetation on the property adjacent to the north comprises *Melaleuca* Forest that is generally older and less condensed than that found within the Project Area.

A site inspection of the Project Area was undertaken on Friday 30 July 2021 with Ken 'Fox' Laurie and Shane Eamens (Yaegl TOAC), with Tim Hill (Everick Heritage Principal Northern NSW) and Matt Finlayson (Everick Heritage Archaeologist). The site inspection aimed to identify;



- the potential for the Project Area to contain Aboriginal archaeological sites; and
- the potential constraints facing the MHE development in terms of the likelihood for harm to be caused to prospective Aboriginal sites (Table 3 and Figure 10).

The amount of vegetation was greater than anticipated from site aerials due to the level of vegetation regrowth in the past 5 years which limited the area subject to survey. As such, the survey served to provide a sample of the Project Area to ascertain the level of disturbance and requirement for further investigations (Figure 11- Figure 16). No Aboriginal sites were identified during the site inspection.

**Table 3: Survey coverage.**

Survey Unit	Landform	Survey Unit Area (m <sup>2</sup> )	Visibility (%)	Exposure (%)	Effective Coverage Area (m <sup>2</sup> )	Effective Coverage (%)
1	Channel Floodplain	3675	10	10	36.75	1

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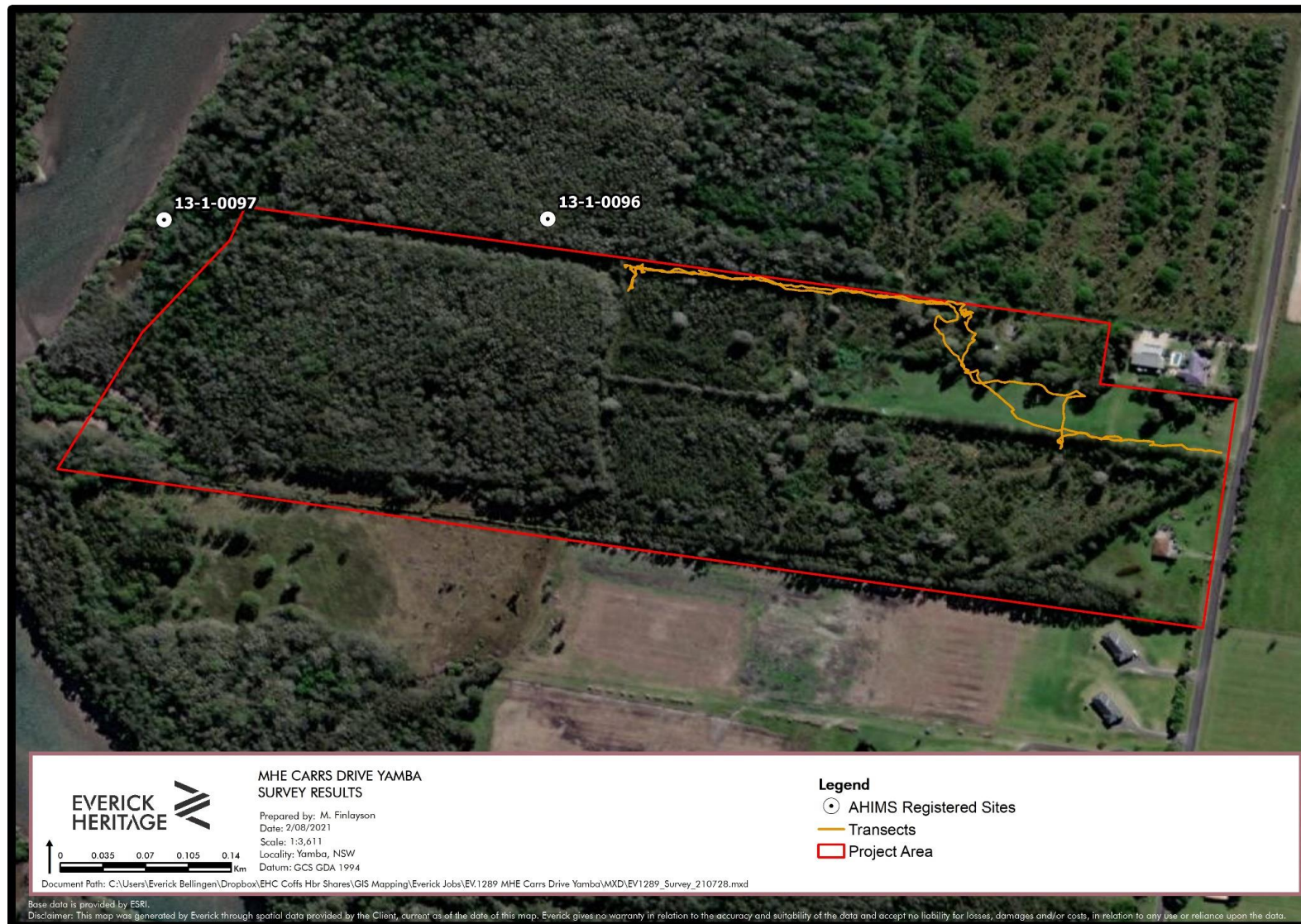


Figure 10: Survey transects and results.



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Figure 11: Lot 3 from Carrs Road, looking west.



Figure 12: GSV and conditions of Lot 3 fill area.



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Figure 13: Cleared easement on northern boundary of Project Area amidst regrowth, facing east.



Figure 14: Melaleuca and box regrowth, facing southeast from northern boundary of Project Area.



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Figure 15: GSV and conditions within regrowth area, northern boundary of Project Area.



Figure 16: Change in level from swamp level to fill level, facing northwest across Lot 3.



## 7. RESULTS OF ABORIGINAL CULTURAL HERITAGE ASSESSMENT

As a result of the desktop study, field inspection and consultation with Yaegl TOAC the following can be concluded:

- a) No Aboriginal sites were identified within the surveyed section of the Project Area.
- b) The revised locations for the Yamba C1 and Yamba C2 middens (Everick 2011) report indicates both the C2 site is within or beside the environmental protection area to the west of the proposed footprint of the MHE development. The C1 site is further north along Oyster Channel.
- c) Vegetation comprises predominantly juvenile *Melaleuca* spp. that has overgrown most of the area of the Proposed Works in the last 5 years. Few mature *Melaleucas* remain and none that were surveyed were noted to have cultural modification. South of the Lot 3 house pad, the vegetation comprises a more mixed variety of regrowth *Casuarina* and Oak with some remnant matures.
- d) The cleared house pad / grassed area comprising 104 Carrs Drive (Lot 3) has been subject to the introduction of fill that has raised the ground surface above the original swampland surface level by approximately 1 m. It is inferred that the soil profile of this area would likely comprise fill overlying original swampy ground surfaces and topsoil deposits. This would be consistent with the findings of the Everick (2011) report which stated the West Yamba (Carrs Drive) area was, drained, cleared and filled by European settlers to overcome the coastal swampland conditions for farming.
- e) It was generally agreed that midden material, if present would more likely be located within 80 metres of the Oyster Channel bank. However, Ken and Shane noted that midden material has been found further east of the Oyster Channel to the south of the Project Area and on Goldings Lane to the east. Low elevated aeolian sand dunes associated with the former coastline have the potential for midden material as these formed islands throughout the swampland.
- f) Ken Laurie remembers the property as being predominantly used for cattle and believes vegetation would have been removed by bulldozer before fill was subsequently scattered to create a new surface.
- g) Due to the level of ground-surface disturbance, lack of surveyable area and limited GSV, it was the conclusion of the Yaegl TOAC sites officers that Aboriginal spotters should be on-site during ground disturbing works for topsoil removal and installation of water retention basins. The objective of the monitoring program would be to identify any former mid-Holocene sand dunes that might occur through the area of the Proposed Works but have been levelled by historic agriculture.

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- h) Test excavations are not deemed to be required as per Section 3 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010) due to the level of disturbance and the lack of proximity of ground disturbing works to a previously recorded midden. This opinion is supported by the Yaegl TOAC representatives preferring on-site monitoring of any potential shell material that be encountered by development of the estate.



## 8. RECOMMENDATIONS

The assessment has concluded that ground disturbing works, being the MHE allotments, bio-retention basins, underground services and interior roads are unlikely to impact on Aboriginal objects and will not impact on any known places or sites of cultural significance to the Aboriginal community. As such additional consultation and archaeological investigation is not required. However, the following recommendations are provided as a precautionary measure to mitigate impacts to potential Aboriginal heritage values.

### Recommendation 1: Aboriginal Objects Find Procedure

It is recommended that if suspected Aboriginal material has been uncovered because of development activities within the Project Area:

- a) work in the surrounding area is to stop immediately;
- b) a temporary fence is to be erected around the site, with a buffer zone of at least 10 metres around the known edge of the site;
- c) an appropriately qualified archaeological consultant is to be engaged to identify the material; and
- b) should the works be deemed to have harmed the Aboriginal objects the Heritage NSW should be notified immediately via the EPA Enviro Hotline.

Having consideration for the outcomes of the ACHA it is recommended that Aboriginal sites monitors from Yaegl TOAC are engaged as “cultural heritage spotters” for ground disturbing works of original topsoils below the extent of the European fill layer.

### Recommendation 2: Aboriginal Human Remains

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

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## APPENDIX A: CORRESPONDENCE WITH YAEGL TOAC

**From:** Yaegl Traditional Owners Aboriginal Corporation . <YaeglTOAC@outlook.com>

**Sent:** Thursday, 29 July 2021 12:05 PM

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

**Cc:** Bill <ceo@yaegltoacrntbc.org.au>

**Subject:** RE: 104 & 120 Carrs Drive Yamba - Fee Proposal Request

Hi Tim,

After our conversation this afternoon this is to confirm that both;

- Ken (Fox) Laurie

Director, Yaegl Knowledge Holder and Yaegl Senior Cultural Heritage Sites Officer

- Shane Eamens

Yaegl Senior Cultural Heritage Sites Officer

Will meet you on-site at 9:30am on Friday 30th July 2021.

Thank you and kind regards,

Dianne

Dianne Chapman

Manager Administration

Yaegl Traditional Owners

Aboriginal Corporation RNTBC

3 Stanley Street,

MACLEAN NSW 2463

Ph: 02 66 452930

M: 0457 925 458

manager@yaegltoacrntbc.org.au

Mobile: TBA

I acknowledge that I work & walk on Yaegl Country & pay respect to my Ancestors & my Elders for the legacy they left for Yaegl people to carry on

# EVERICK HERITAGE

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

**Sent:** Monday, 26 July 2021 9:18 AM

**To:** YaeglTOAC@outlook.com

**Cc:** Bill <ceo@yaegltoacrnbc.org.au>; andrew@md-engineer.com.au

**Subject:** FW: 104 & 120 Carrs Drive Yamba - Fee Proposal Request

Dear Diane

Please see below the plan for the proposed Modular Housing Estate site at 104/120 Carrs Drive, Yamba. The Lot/DP are Lot 3 DP733507 and Lot 2 DP733507 respectively.

We have instructions to undertake an archaeological site inspection. Can you please indicate if a Yaegl sites officer would be available either this Thursday (29th) or Friday (30th).

Please call if its easier.

Ta

Tim Hill

BA (Hons)

Principal (Coffs Harbour)

Ph: (02) 6655 0225

Mob: 0422 309 822

Everick Heritage Pty Ltd


ABN 78 102 206 682

Brisbane - Townsville - Sydney - Coffs Harbour - Tweed Heads - Canberra - Alice Springs

Web: [www.everick.com.au](http://www.everick.com.au)



## APPENDIX B: AHIMS EXTENSIVE SEARCH RESULTS



Office of Environment & Heritage

AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : EV1289

Client Service ID : 607513

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports
13-1-0072	Golding Road Midden;	AGD	56	532700	6743300	Open site	Valid	Shell : -, Artefact : -	Midden	
	<a href="#">Contact</a>	<a href="#">Recorders</a>	<a href="#">Permits</a>							
13-1-0096	Yamba C1	AGD	56	531575	6743100	Open site	Valid	Shell : -, Artefact : -	Midden	
	<a href="#">Contact</a>	<a href="#">Recorders</a>	<a href="#">Permits</a>							
13-1-0097	Yamba C2	AGD	56	531300	6743100	Open site	Valid	Shell : -, Artefact : -	Midden	
	<a href="#">Contact</a>	<a href="#">Recorders</a>	<a href="#">Permits</a>							

Report generated by AHIMS Web Service on 19/07/2021 for Matthew Finlayson for the following area at Lot : 2, DP:DP733507 with a Buffer of 1000 meters. Additional Info : arch assessment.

Number of Aboriginal sites and Aboriginal objects found is 3

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

Page 1 of 1

Report generated by AHIMS Web Service on 19/07/2021 for Matthew Finlayson for the following area at Lot : 2, DP:DP733507 with a Buffer of 1000 meters. Additional Info : arch assessment.

Number of Aboriginal sites and Aboriginal objects found is 3

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