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GRAFTON BASE HOSPITAL REDEVELOPMENT
EARLY WORKS
ABORIGINAL CULTURAL HERITAGE (DUE DILIGENCE)
ASSESSMENT

April 2024

Mace/ GeoLINK





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ABBREVIATIONS

ACHA	Aboriginal Cultural Heritage (Due Diligence) Assessment
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
DA	Development Application
DECCW	Department of Environment, Climate Change and Water (now Heritage NSW)
EIS	Environmental Impact Assessment
EPA	Environmental Planning and Assessment
ICT	Information and Communication Technology
LALC	Local Aboriginal Land Council
LEP	Local Environment Plan
NPW	National Parks and Wildlife
OEH	Office of Environment and Heritage
PAD	Potential Archaeological Deposit
Proposed Works	Alterations to existing buildings within the Grafton Correctional Facility for repurposing for hospital use and minor enabling works within the Grafton Base Hospital
Study Area	Part of the former Grafton Correctional Facility at 185 Arthur Street, Grafton (Lot 1 Section 118 DP758470), Grafton NSW 2460 Part of the Grafton Base Hospital at 184 Arthur Street, Grafton (Lot 22 DP1024231)

1 INTRODUCTION

1.1 Project Background

Heritage Management & Planning Pty Ltd has been commissioned by Mace/GeoLINK Consultants to provide a Aboriginal Cultural Heritage (Due Diligence) Assessment to support the Development Application for the enabling and acquisition works for the Grafton Base Hospital Redevelopment at the former Grafton Correctional Facility, located at 185 Arthur Street and the Grafton Base Hospital, located at 184 Arthur Street Grafton NSW (the Study Area) (see **Figure 1** and **Figure 2**). The application for the early works is required to provide for the operation of the Grafton Base Hospital during a major redevelopment and include internal fit out and renovations. The assessment is provided to consider the potential impact on Aboriginal archaeological sites that might result from the acquisition works and to determine whether the application can be approved in accordance with the Due Diligence approval pathway (section 87 of the National Parks and Wildlife Act NSW (1974)).

1.2 Project Brief & Methodology

The brief for this project was to undertake Aboriginal cultural heritage assessment in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010). The Due Diligence assessment includes the following:

- a description of the nature of the works with specific consideration of movement of topsoils with the potential to contain Aboriginal objects
- a search of relevant Aboriginal heritage registers, including the Aboriginal Heritage Information Management System, to identify previously recorded sites in the local area
- a review of environmental information to consider the potential that the Study Area is located in landforms or landscapes with an elevated potential to contain Aboriginal objects or cultural values
- a review of historic ground disturbance to consider factors which might have removed Aboriginal objects from the Study Area, and
- documentation of the assessment outcomes including:
 - i. a summary of any known Aboriginal archaeological sites within the Study Area or its immediate vicinity
 - ii. appropriate mitigation measures to avoid known Aboriginal archaeological sites or landforms with the potential to contain Aboriginal archaeological sites, and
 - iii. statements on the adequacy of the assessment including the requirement for additional archaeological investigation and Aboriginal community consultation.

1.3 Description of the Proposed works

1.3.1 *Refurbishment of former Grafton Correctional Centre*

It is proposed to refurbish part of the decommissioned Grafton Correctional Facility by repurposing existing buildings for use as part of the Grafton Base Hospital, and will include the following works (Figure 2 and Figure 3):

- Internal alterations / additions, including an internal lift, to Blocks A and B and the Arthur Street Gatehouse to convert to office and training space;
- Construction of a new enclosed link bridge between Blocks A and B;
- Installation of new roof (Blocks A and B).

The Proposal does not include any alterations or change in use to the existing gymnasium or accommodation buildings (Block C and D). It is anticipated that Block C and D will be part of a future conversion to key worker accommodation which will be subject to a separate planning approval pathway. Other than minor changes to the gatehouse, the existing brick wall surrounding the site will be retained as is.

1.3.2 *Enabling works at Grafton Base Hospital*

The Proposal also involves the enabling works on the Grafton Base Hospital site including:

- Installation of a private ICT pathway (Information and Communication Technology) beneath Arthur Street linking with new private ICT pathways across the Grafton Base Hospital site and the former Correctional Centre site, and
- Electrical infrastructure including a new substation and main switchboard

1.4 Report Authorship

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

1.5 Consultation with Grafton Ngerrie Local Aboriginal Land Council

Consultation with the Local Aboriginal community through Casino Local Aboriginal Land Council (LALC) is a standard practice for Aboriginal cultural heritage (Due Diligence) assessments. The purposes of the consultation are to identify any potential sites that are known to the Aboriginal community that are not registered on AHIMS and to have a second party verify the survey methodology and results if required.

The following summarises consultation with Grafton Ngerrie LALC:

- a phone message was left at the office landline on 7 July 2023
- an email was sent on 8 July 2023 providing a background to the assessment and requesting a site officer for 24 July 2023
- a follow up phone call and phone message was made on 12 July 2023, and



- the site inspection was attended by Mr. Sterling Brown who is a representative of the Gumbayngirr and Bundjalung people and a experienced Aboriginal sites officer in Grafton and the Clarence Valley.

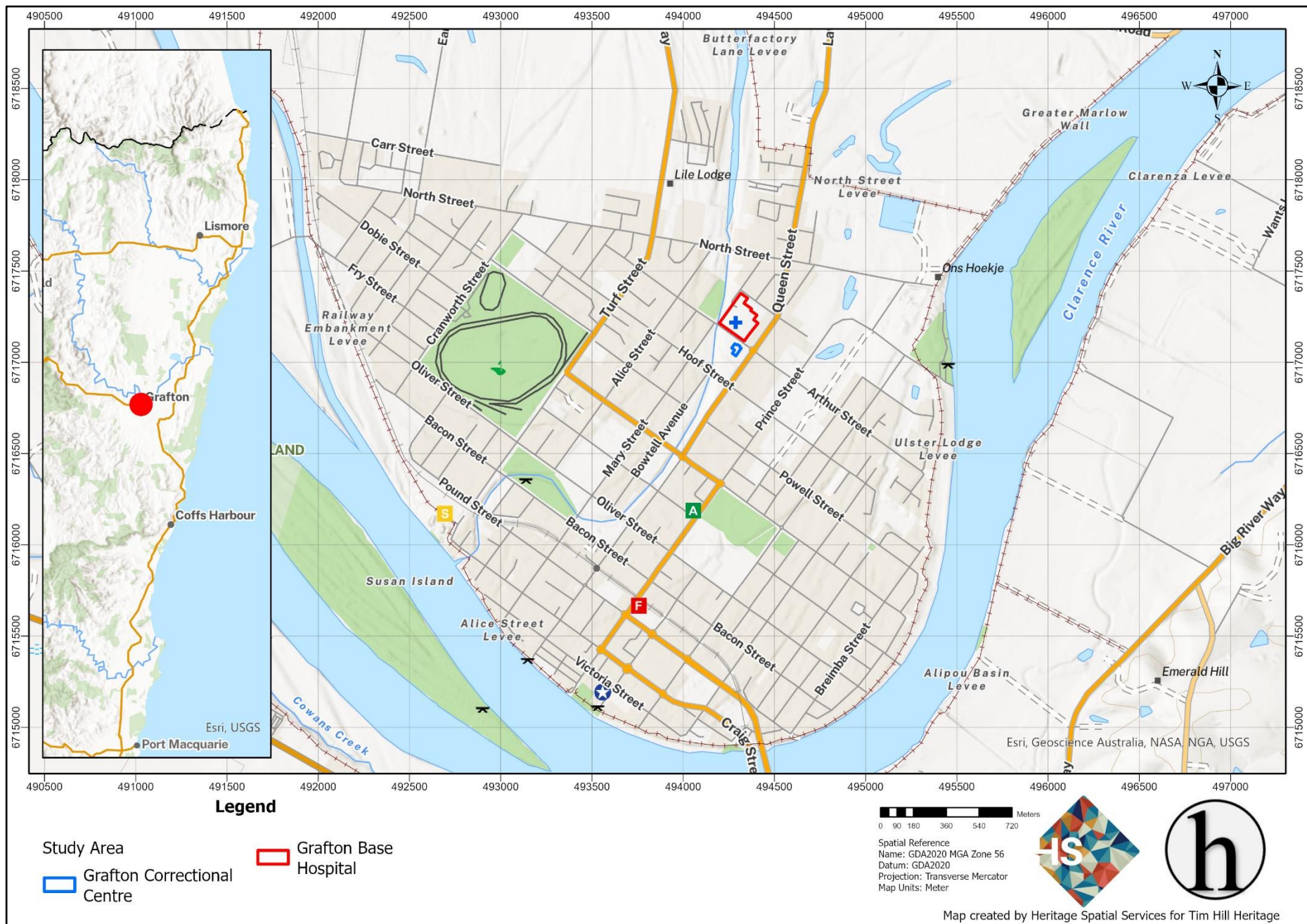
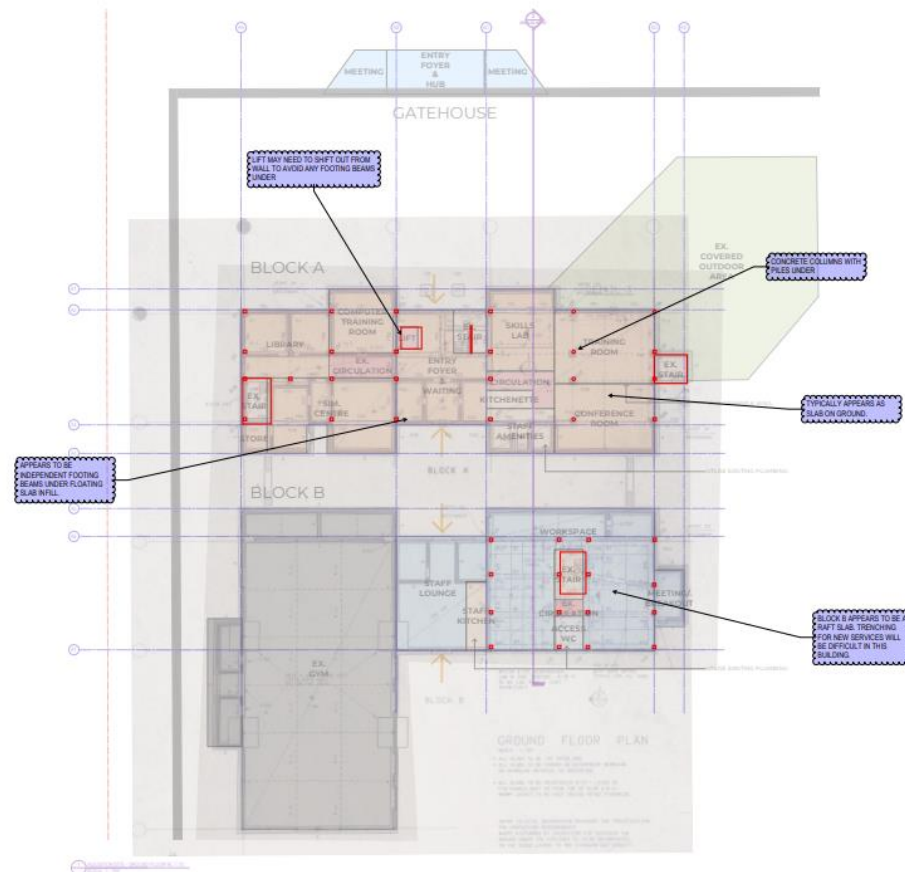


Figure 1: Grafton Base Hospital Early Works: General Location



GROUND FLOOR PLAN

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It is acknowledged that this plan is a preliminary design and is subject to change without notice.

Rev	Description	Date	By	Check
A	ISSUED FOR INFORMATION	10/03/20	JS	TS
B				
C				
D				
E				



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**GRAFTON BASE HOSPITAL
REDEVELOPMENT**
ADDRESS LINE 1 XXX
ADDRESS LINE 2 XXX

ACQUISITION SITE - GROUND LEVEL			
Drawn	Date	Scale	Rev
XXXX	XXXXXX	1:250	XXXX
Designed	Project No.	Drawn No.	Rev
JS/TDL	NS222087	SKT-001	A

Figure 2: Grafton Base Hospital Early Works: Acquisition site ground level floor plan

1.6 Legislative And Planning Context

1.6.1 *Environmental Planning and Assessment Act (1979)*

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

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

The proposed site acquisition works are being determined by Clarence Valley Council under Part 4 of the EPA Act. Completion of a Due Diligence assessment is an appropriate approval pathway for works assessed by a Development Application where the lands have been subject to significant ground disturbance and are not near known Aboriginal archaeological sites.

1.6.2 *National Parks and Wildlife Act 1974 (NSW) and Regulations 2019 (NSW)*

The *National Parks and Wildlife Act 1974* (NSW) (NPW Act) is the primary legislation concerning the identification and protection of Aboriginal cultural heritage in New South Wales. Three key definitions in the NPW Act which are relevant to this assessment include:

- **Aboriginal object** means any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction and includes Aboriginal remains.
- **Aboriginal remains** means the body or the remains of the body of a deceased Aboriginal person, but does not include—
 - (a) a body or the remains of a body buried in a cemetery in which non-Aboriginal persons are also buried, or
 - (b) a body or the remains of a body dealt with or to be dealt with in accordance with a law of the State relating to medical treatment or the examination, for forensic or other purposes, of the bodies of deceased persons.
- **Harm** an object or place includes any act or omission that—
 - (a) destroys, defaces or damages the object or place, or
 - (b) in relation to an object—moves the object from the land on which it had been situated, or
 - (c) is specified by the regulations, or

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

but does not include any act or omission that—

(e) desecrates the object or place, or

(f) is trivial or negligible, or

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

Section 86 of the NPW Act provides offense provisions for Aboriginal objects, Aboriginal skeletal remains and Aboriginal places in NSW (see the definition of ‘Harm’ above). **Section 87** of the NPW Act outlines defences against prosecution relating to Aboriginal objects, skeletal remains and Aboriginal places. These include:

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

The application of the Due Diligence Code of Practice is considered an appropriate approval pathway as the proposed enabling and establishment works do not meet the criteria of a ‘low impact activity’ as defined by the NPW Act and Regulations. Completion of an assessment in accordance with the Due Diligence Code of Practice is considered to be a defense against prosecution where the study has concluded the works will not likely impact on Aboriginal objects (Section 87(2) of the NPW Act).

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

The Due Diligence assessment has been undertaken in accordance with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (DECCW 2010A). The purpose of this Due Diligence Code of Practice “is to establish a defence against prosecution in the event that Aboriginal objects may be inadvertently harmed during an activity” (DECCW 2010A: 1 & 2). The Due Diligence Code of Practice:

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

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

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

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

However, the practical application of the Due Diligence Code of Practice is that it is a process of establishing whether additional investigation is required. In the event that the Due Diligence study concludes that harm to Aboriginal objects is likely, additional archaeological investigation, including Aboriginal community consultation, in accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010 B) (CoPAI) is required. A key limitation of the Due Diligence Code of Practice and the CoPAI is that they do not clearly define the thresholds of “likely” or “highly likely”. To assist the assessment, the Merriam Webster dictionary definition (www.merriam-webster.com/dictionary) of “likely” is:

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

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

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

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

The *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010B) provides the following statement on the application of the Code:

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

The purpose of this CoPAI is to (DECCW 2010B:1):

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

for an AHIP. This Code explains what that information is in relation to archaeological investigations.

The proposed acquisition and enabling works do not trigger the requirement for a comprehensive archaeological assessment as the works do not involve ground disturbance which is likely to impact on Aboriginal objects of places.

1.6.5 *Guide to Investigating, Assessing and Reporting on Aboriginal cultural Heritage in NSW (OEH 2011)*

The *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011) provides the following statement on the role of the Aboriginal Cultural Heritage Assessment Report in the management of Aboriginal heritage in NSW:

Anyone proposing to carry out an activity that may harm an Aboriginal object or a declared Aboriginal place must investigate, assess and report on the harm that may be caused by the activity they propose.

The investigation and assessment of Aboriginal cultural heritage is undertaken to explore the harm of a proposed activity on Aboriginal objects and declared Aboriginal places and to clearly set out which impacts are avoidable and which are not. Harm to significant Aboriginal objects and declared Aboriginal places should always be avoided wherever possible. Where harm to Aboriginal objects and declared Aboriginal places cannot be avoided, proposals that reduce the extent and severity of harm to significant Aboriginal objects and declared Aboriginal places should be developed.

An Aboriginal cultural heritage assessment report is a written report detailing the results of the assessment and recommendations for actions to be taken before, during and after an activity to manage and protect Aboriginal objects and declared Aboriginal places identified by the investigation and assessment.

Compliance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011) is a minimum requirement for a AHIP application. It is additionally a useful guide for all Aboriginal cultural heritage assessments irrespective of the approval pathway. As a rule, the level of assessment should be proportionate to the scale of the proposed impacts and the nature, extent and significance of Aboriginal cultural values that are potentially affected by an activity.

2 HERITAGE DATABASES AND DESKTOP ASSESSMENT

2.1 Aboriginal Heritage Information Management System

The Aboriginal Heritage Information Management System (AHIMS) provides a list of previously recorded Aboriginal sites in NSW. A search of the AHIMS database is a condition of compliance with the Due Diligence Code of Practice and provides information on the types of sites which are, or may be, located within and around the Study Area.

A search (AHIMS #:801012) was undertaken on 17 July 2023 for the area “Lat, Long From -29.7184, 152.8813 - Lat, Long To : -29.6438, 153.0049” (**Figure 4**). It is noted that 3 sites were recorded in the vicinity of the Study Area, being two scarred trees near the Grafton Central Business District and a historic campsite at the western end of Carr Street. These types of sites will not occur in the Study Area, which has been completely cleared of original forests.

2.2 NSW Aboriginal Place Register

The Study Area is not listed on the NSW Aboriginal Place register as an area of special significance to the Aboriginal community.

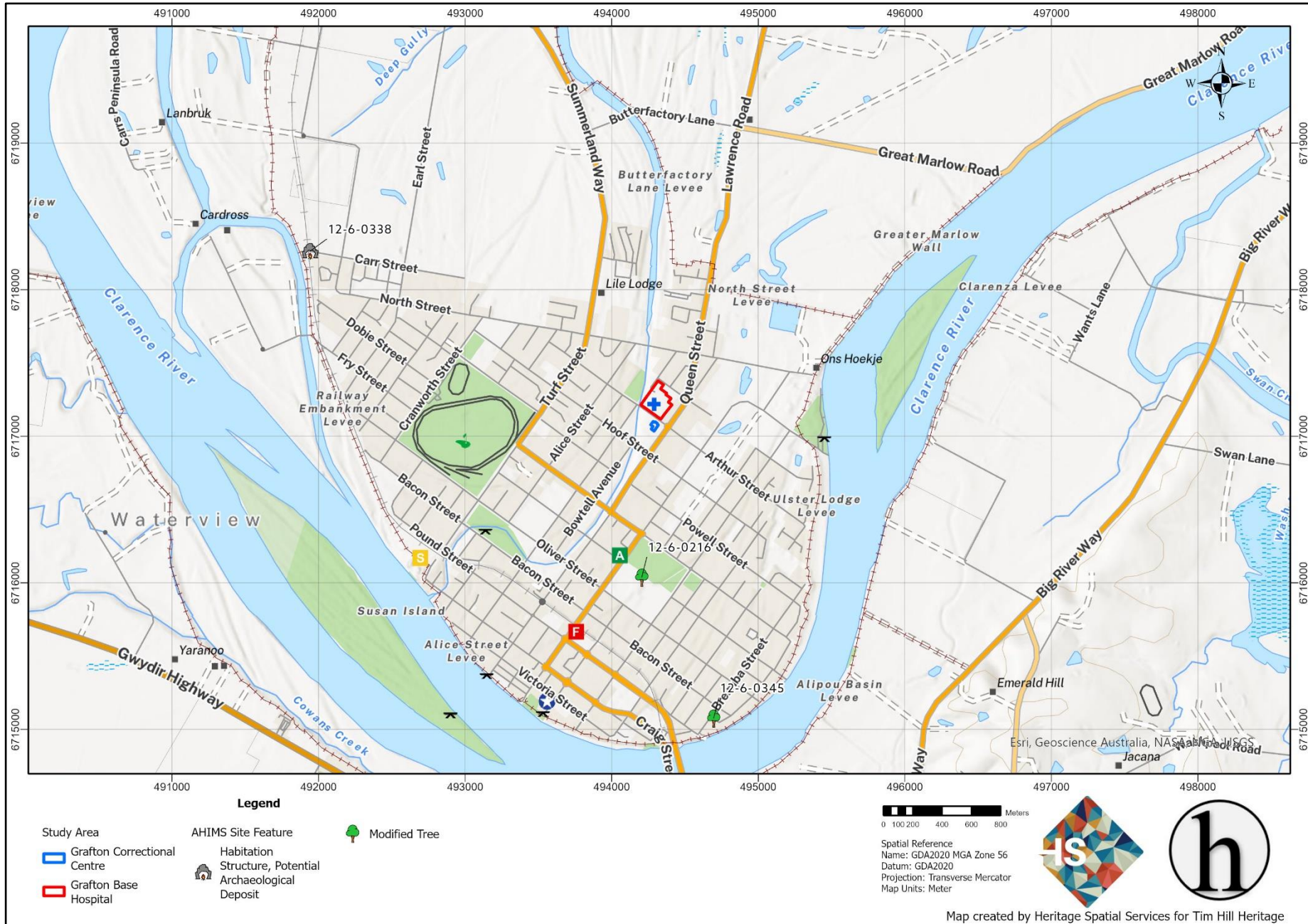


Figure 4: Grafton Base Hospital Early Works- AHIMS search results (#801012)

3 ENVIRONMENTAL REVIEW

3.1 Topography, Hydrology, Geology and Vegetation models

The Study Area is located the Clarence River Floodplain, approximately 350 metres south of the Clarence River. The Study Area has no topography but has a slight westerly aspect towards Alamy Creek - which forms north of Grafton and has a main confluence with the Clarence River at Southgate (**Figure 5**). Alamy Creek is described as a paleochannel of the former Clarence River. The geological mapping of the Study Area includes 'Alluvial floodplain deposits' from the Quaternary/ Holocene period (see **Figure 6**). The following vegetation model is provided for the Clarence Richmond Alluvial Plains land system soil landscape (Mitchell 2002:145) (**Figure 7**):

Extensively cleared the valley floor supported forest of cabbage gum (*Eucalyptus amplifolia*), forest red gum (*Eucalyptus tereticornis*), broad-leaved apple (*Angophora subvelutina*), river oak (*Casuarina cunninghamiana*), silky oak (*Grevillea robusta*), rough-barked apple (*Angophora floribunda*), native teak (*Flindersia australis*), coastal grey box (*Eucalyptus bosistoana*), pink bloodwood (*Corymbia intermedia*), spotted gum (*Corymbia maculata*), grey ironbark (*Eucalyptus paniculata*), broad-leaved paperbark (*Melaleuca quinquenervia*), blackwood (*Acacia melanoxylon*) and black she-oak (*Casuarina litoralis*).

3.2 Disturbance History

3.2.1 Crown Plans

A review of Crown Plans has been undertaken to understand the disturbance history of the Study Area. The following summarises key disturbance events that would reduce the likelihood that the Study Area would contain Aboriginal archaeological sites.

1869- the original hospital site is marked on the plan and the portion of the Grafton Base Hospital subject to the early works is separated by a laneway- the Grafton Correctional facility is vacant land (**Figure 8**)

1898- no buildings are identified on the plan, however the Grafton Correctional Facility is identified as the 'Gaol Site' (**Figure 9**), and

1925- no buildings are shown on the Crown Plan relating to the Grafton Base Hospital or the Grafton Correctional Facility- however two residential dwellings are noted on the plan fronting Arthur Street (**Figure 10**).

3.2.2 Grafton Correctional Facility

A review of historic aerial photos available from the NSW Spatial Collaboration portal has been undertaken to understand the disturbance history of the Study Area. The following summarises key disturbance events that would reduce the likelihood that the Study Area would contain Aboriginal archaeological sites.

1953- the Study Area comprises an area of market gardens associated with the old Grafton Gaol (**Figure 11**).

1963- the Study Area is substantially unchanged (**Figure 12**)

1970- the Study Area is substantially unchanged (**Figure 13**)

1978- The deputy superintendents' residence is visible in the location of the current entrance (Block A and Block B) (**Figure 14**)

1990- the Grafton Correctional Facility buildings are visible and would reasonably have resulted in significant ground disturbance during construction (**Figure 15**)

2023- the Study Area is substantially unchanged from the 1991 aerial image (**Figure 16**).

Based on the review of historical aerial photos it is reasonable to proceed with the assessment on the basis that the Grafton Correction Facility has been subject to significance ground disturbance as defined by the Due Diligence Code of Conduct, being disturbance that is "clear and observable". The nature of this ground disturbance would significantly reduce the likelihood that Aboriginal archaeological sites will be retained within the Study Area. As such, no additional archaeological investigation is required to comply with the requirement of the Due Diligence Code of Practice (DECCW 2010A). Photos of the Study Area are provide to inform this assessment (**Figure 17-Figure 20**).

3.2.3 Grafton Base Hospital

A review of historic aerial photos available from the NSW Spatial Collaboration portal has been undertaken to understand the disturbance history of the Study Area. The following summarises key disturbance events that would reduce the likelihood that the Study Area would contain 'in-situ' Aboriginal archaeological deposits.

1953- the area of the early works, located on the eastern boundary of the Study Area, comprises a vacant land with the two private dwellings, visible on the 1925 Crown plan, fronting the boundary with Arthur Street (**Figure 11**).

1963- the section of the hospital subject to the early works is substantially unchanged (**Figure 12**)

1970- the two smaller buildings on Arthur Street have been demolished and two large buildings have been constructed over the formerly vacant land (**Figure 13**)

1978- the section of the Study Area subject to the early works is substantially unchanged (**Figure 14**)

1990- the section of the Study Area subject to the early works is substantially unchanged (**Figure 15**)

2023- the Study Area is substantially unchanged from the 1991 aerial image, however there has been some infill of formerly grassed areas with bitumen driveways and carparks (**Figure 16**).

Based on the review of historical aerial photos it is reasonable to proceed with the assessment on the basis that the Grafton Base Hospital has been subject to significance ground disturbance as defined by the Due Diligence Code of Conduct, being disturbance that is "clear and observable". The nature of this ground disturbance would significantly reduce the likelihood that Aboriginal archaeological sites will be retained within the Study Area. As such, no additional archaeological investigation is required to comply with the requirement of the Due Diligence Code of Practice (DECCW 2010A). Photos of the Study Area are provide to inform this assessment (**Figure 21- Figure 24**).

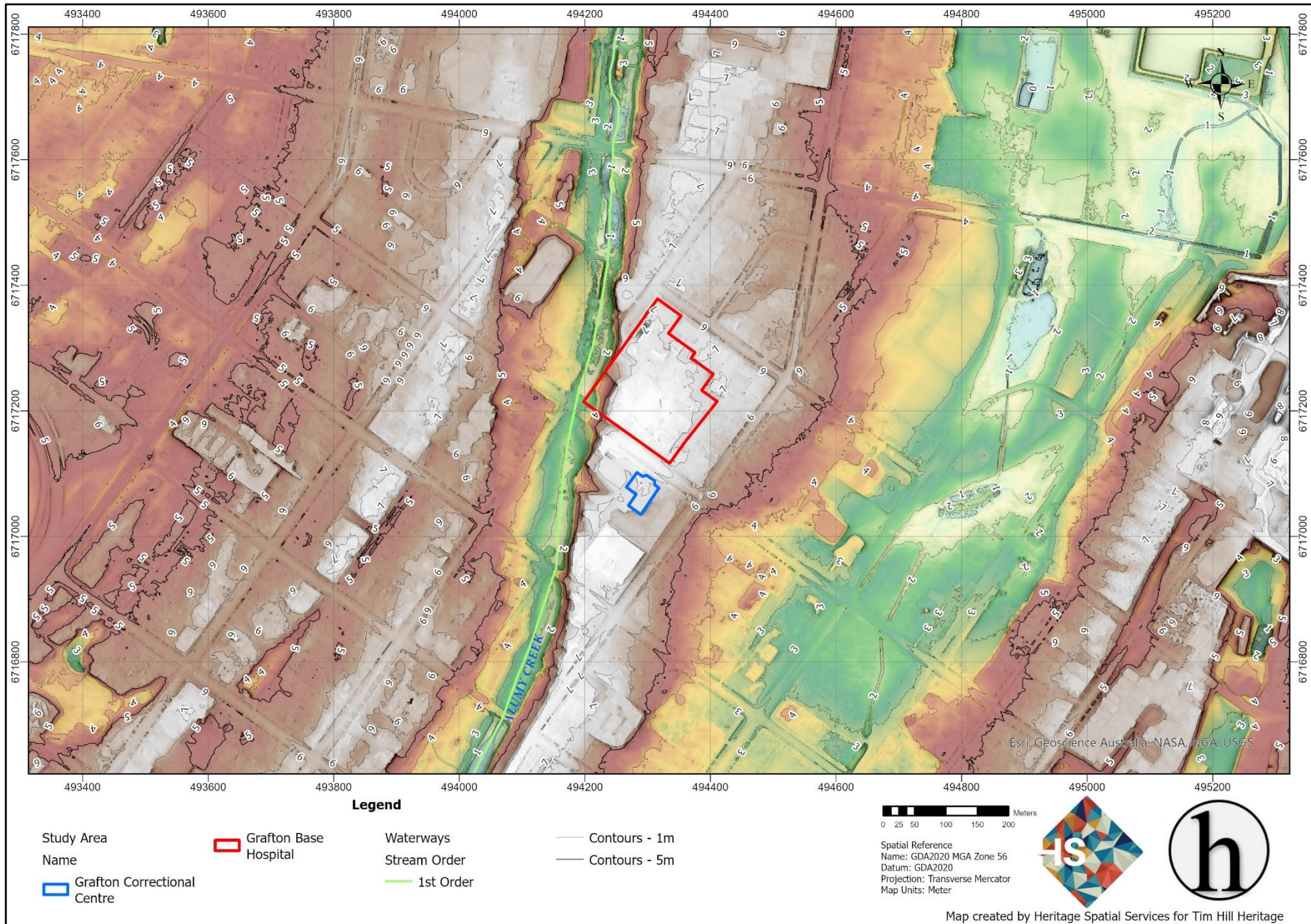


Figure 5: Grafton Base Hospital Early Works- Hydrology and topography

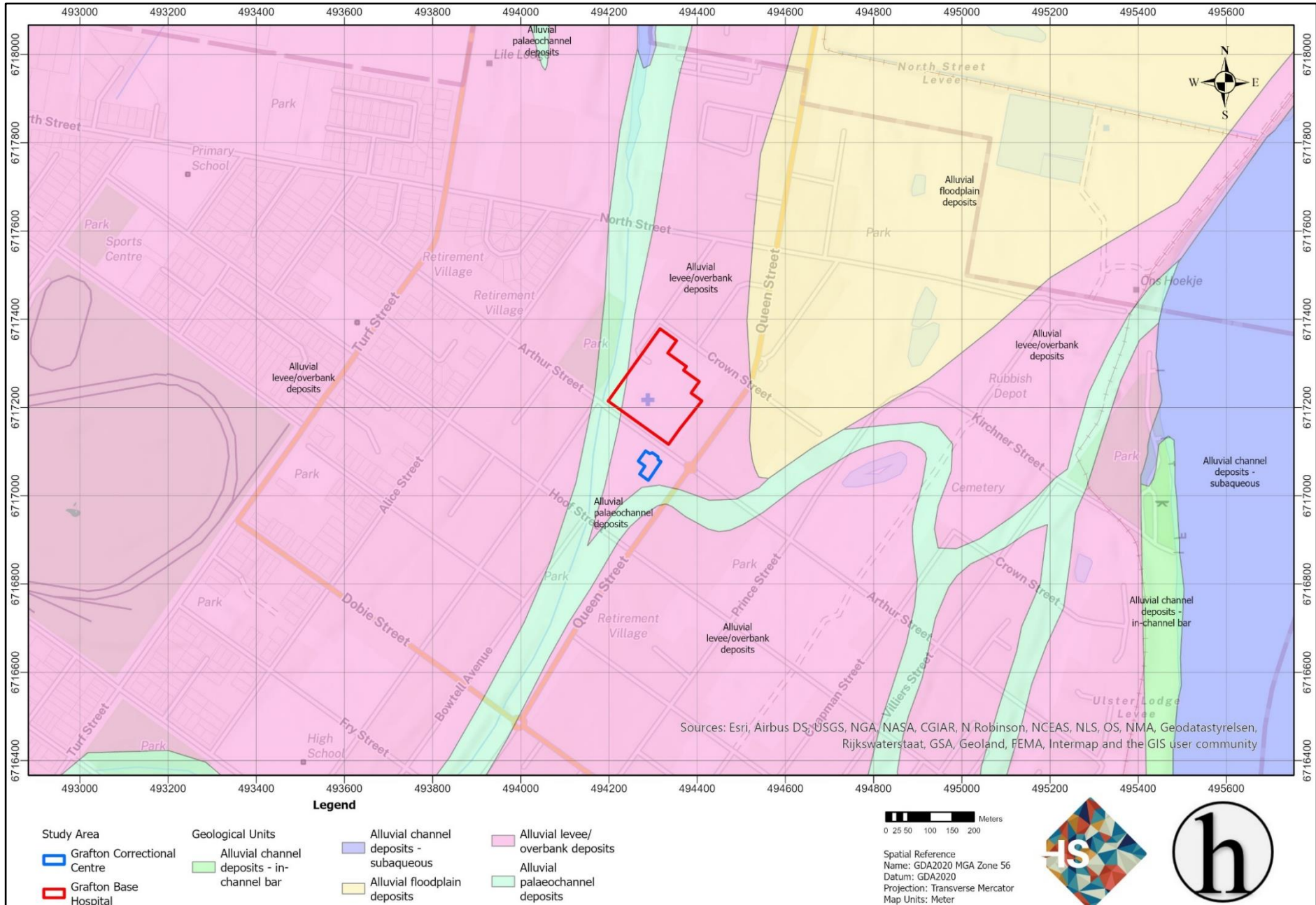


Figure 6: Grafton Base Hospital Early Works- Geological model

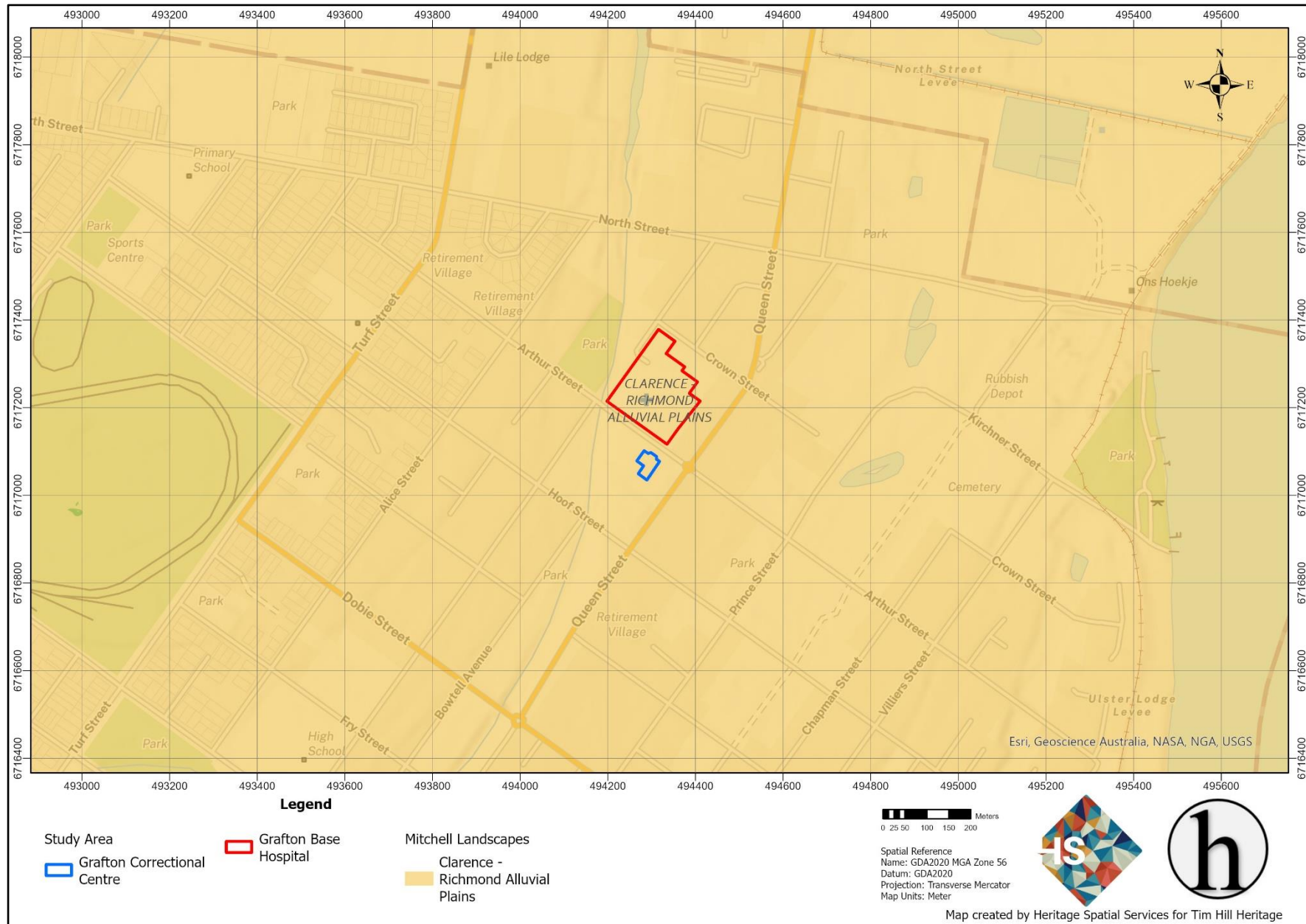


Figure 7: Grafton Base Hospital Early Works- Mitchell landscapes

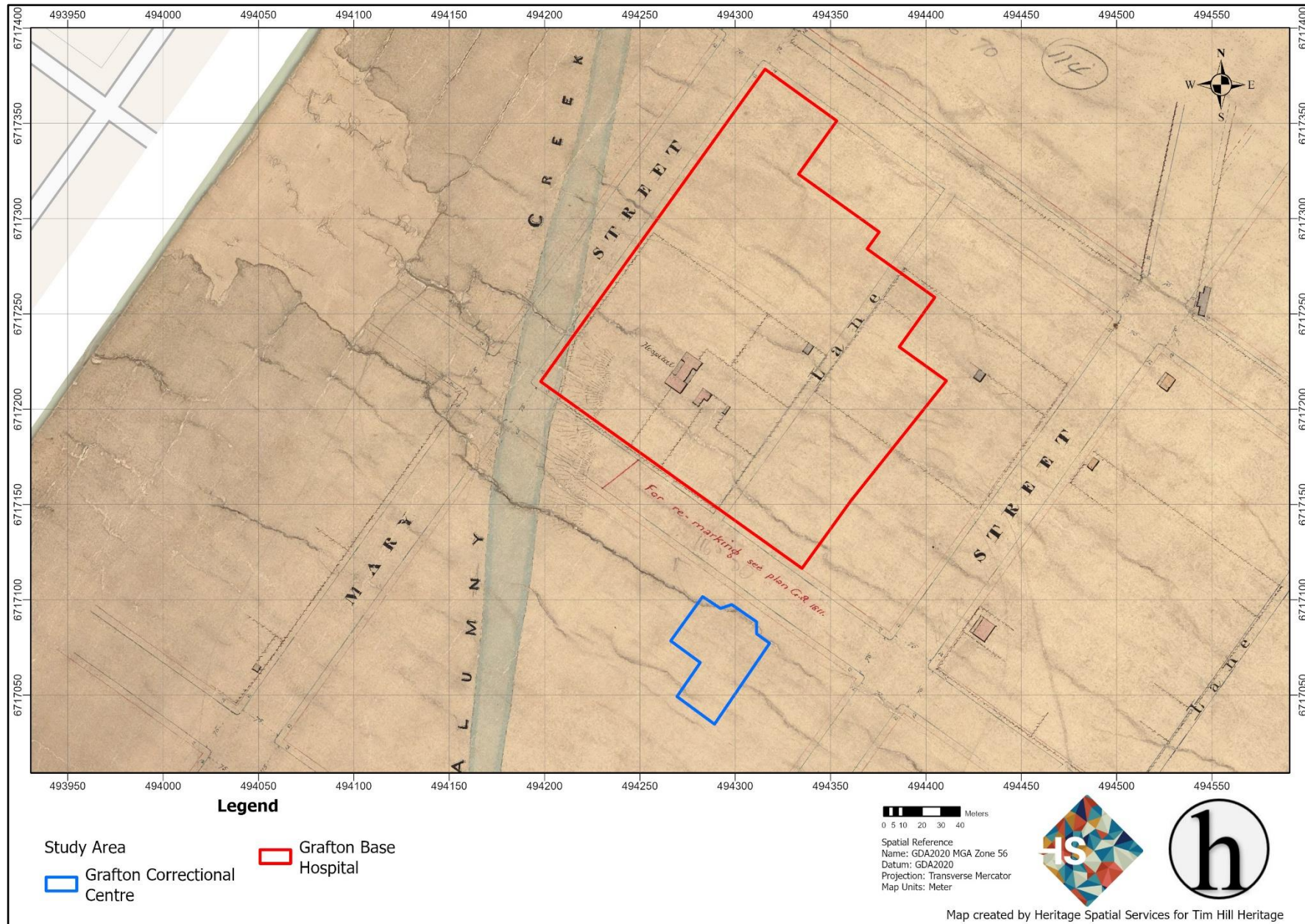


Figure 8: Grafton Base Hospital Early Works- 1869 Crown Plan

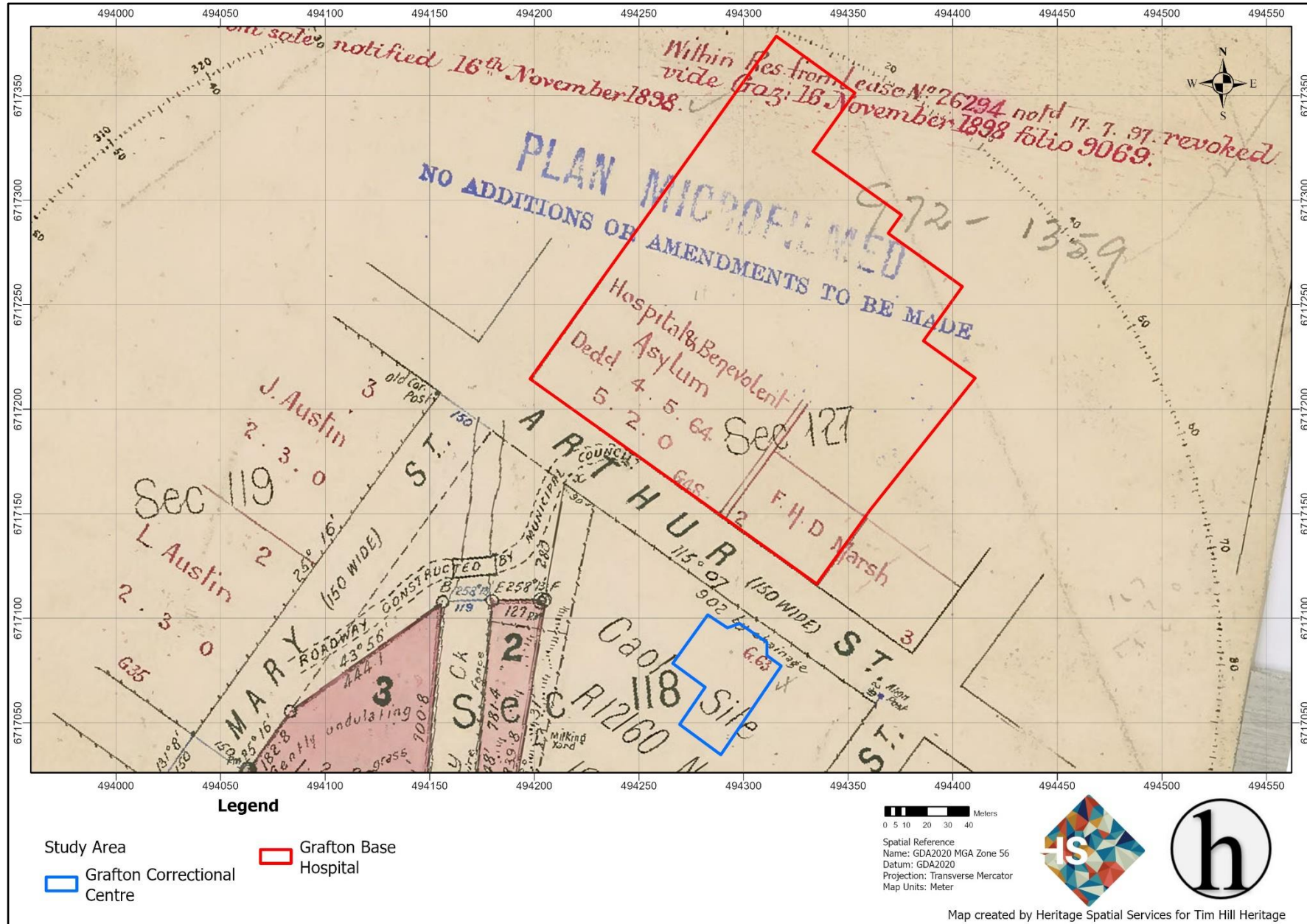


Figure 9: Grafton Base Hospital Early Works- 1898 Crown Plan

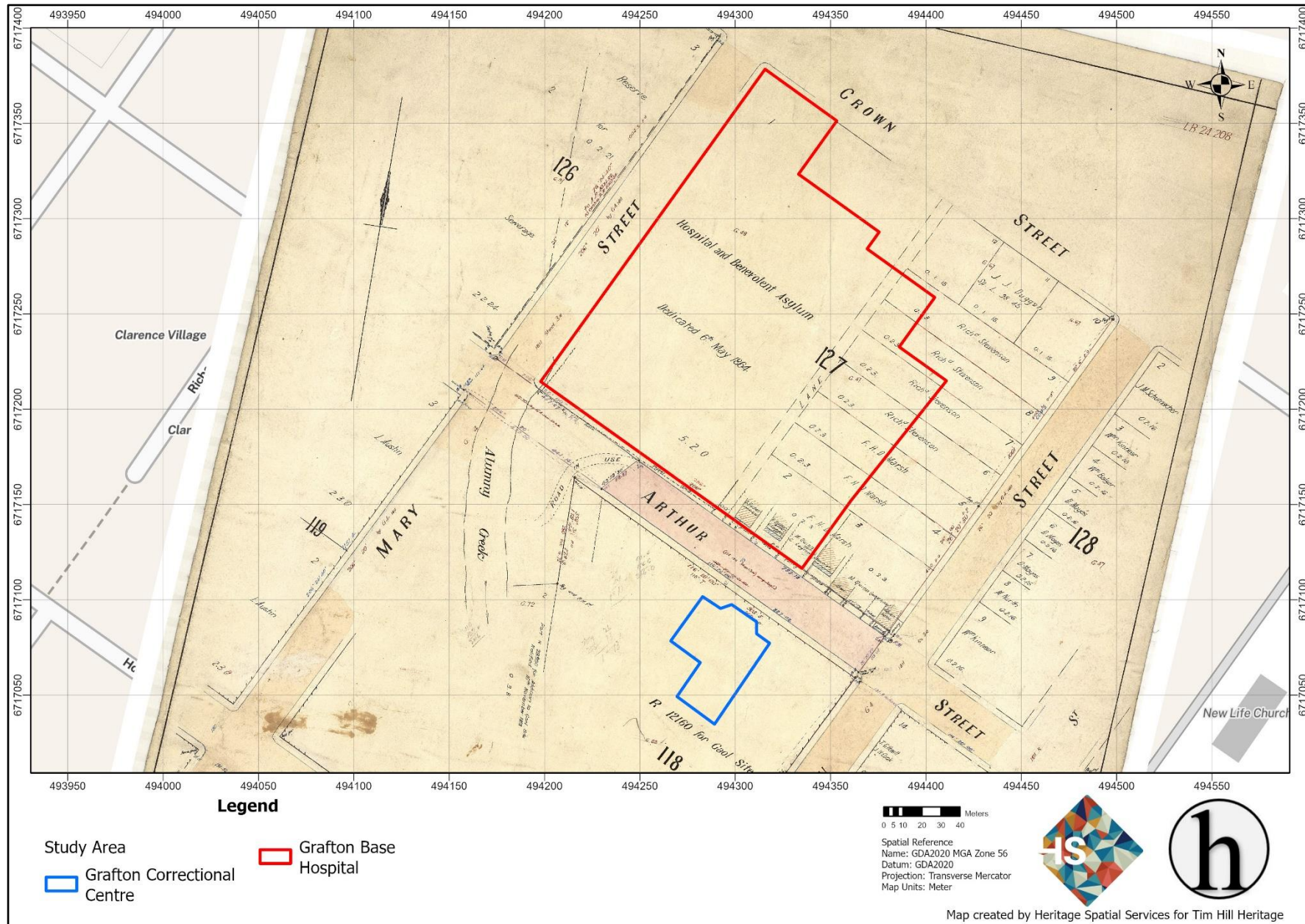


Figure 10: Grafton Base Hospital Early Works- 1925 Crown Plan



Figure 11: Grafton Base Hospital Early Works- 1953 aerial photo (NSW Spatial Collaboration Portal)



Figure 12: Grafton Base Hospital Early Works- 1963 aerial photo (source NSW Spatial Collaboration Portal)



Figure 13: Grafton Base Hospital Early Works- 1970 aerial photo (source NSW Spatial Collaboration Portal)



Figure 14: Grafton Base Hospital Early Works- 1978 aerial photo (source NSW Spatial Collaboration Portal)

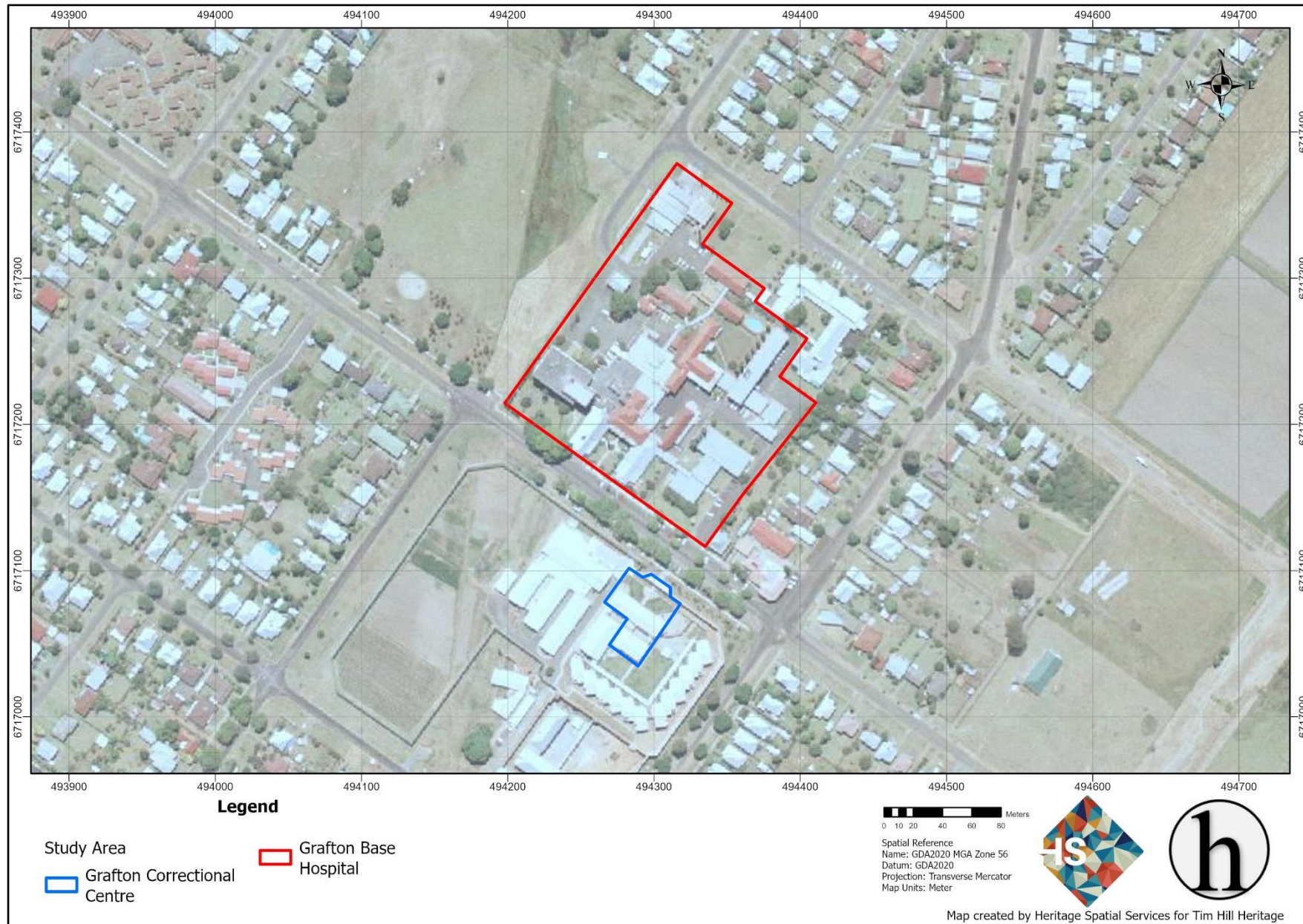


Figure 15: Grafton Base Hospital Early Works- 1990 aerial photo (source NSW Spatial Collaboration Portal)

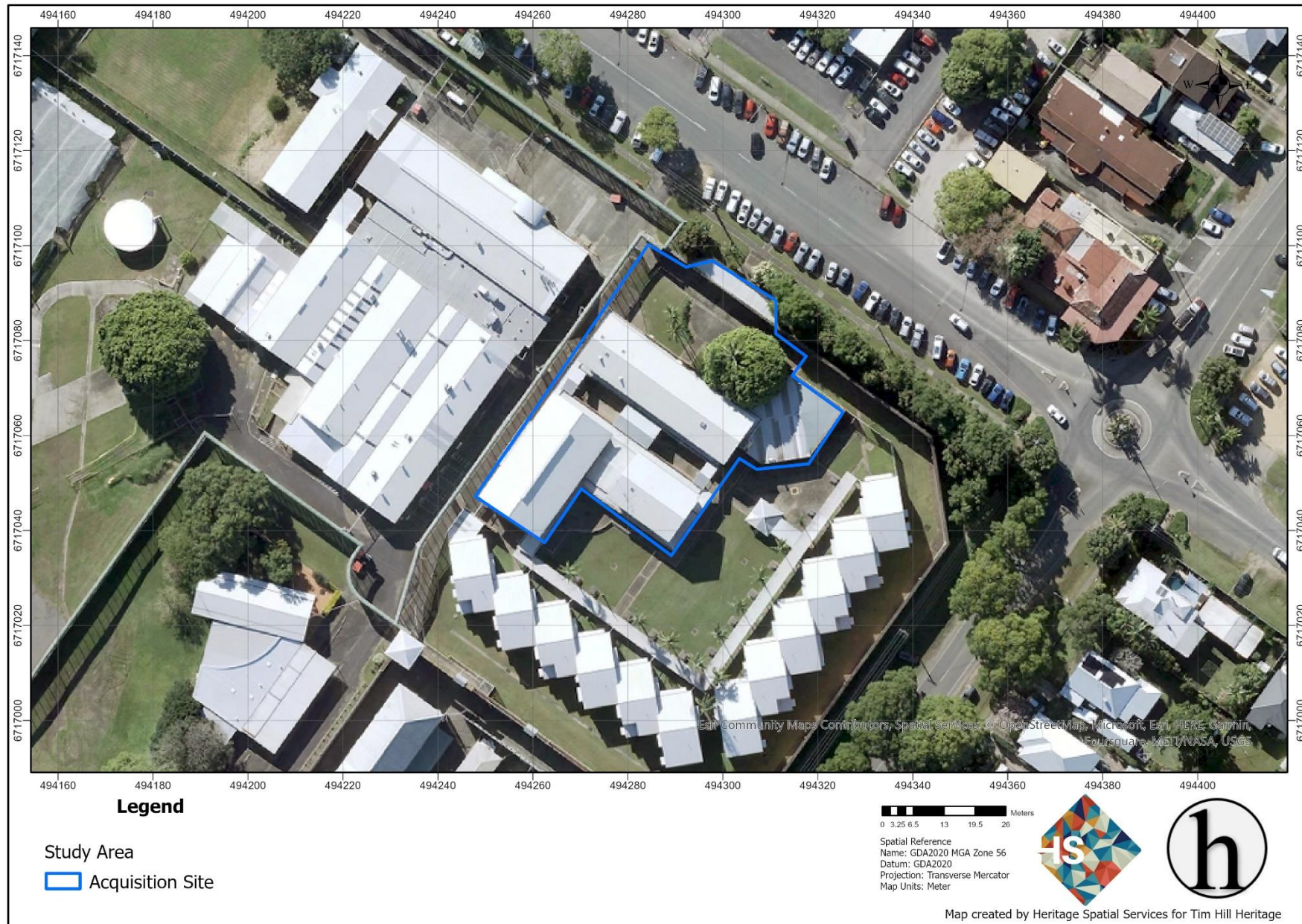


Figure 16: Grafton Base Hospital Early Works- 2023 aerial photo (source NSW Spatial Collaboration Portal)



Figure 17: Grafton Correctional Facility- The front courtyard and the main entrance to Block A



Figure 18: Grafton Correctional Facility- The internal courtyard south of Block B



Figure 19: Grafton Correctional Facility- The former visitors courtyard



Figure 20: Grafton Correctional Facility- Example of typical ground finish between buildings



Figure 21: Grafton Base Hospital- Entrance to the former ward and nurses quarters- now bitumen.



Figure 22: Grafton Base Hospital- The old courtyard in front of the former wards and nurses quarters



Figure 23: Grafton Base Hospital- A small garden behind the former nurses quarters



Figure 24: Grafton Base Hospital- Typical bitumen road and parking off Arthur Street

4 DUE DILIGENCE STATEMENTS

4.1 Description of the Proposed works

The development application seeks approval for alterations to existing buildings within the old Jail site for repurposing for hospital use and within the hospital site. The Proposal includes:

- Refurbishment of the former Grafton Correctional Centre site into office accommodation to be used as part of the Grafton Hospital Administration section (no clinical services will be relocated to this site);
- Installation of a private ICT pathway (Information and Communication Technology) beneath Arthur Street linking with new private ICT pathways across the Grafton Base Hospital site and the former Correctional Centre site;
- Electrical infrastructure including a new substation and main switchboard;
- Compound and waste areas;
- Minor alterations to access and on-site vehicle manoeuvring.

The works are required as enabling works to provide administrative, office and training support for the Grafton Base Hospital during major redevelopment works which will be undertaken as a separate stage as State Significant Development.

4.2 Proximity to known Aboriginal sites:

No Aboriginal sites have been recorded within or immediately adjacent to the Study Area on the AHIMS database. The AHIMS site records which are in close proximity are scarred or modified trees and a historical campsite- no original trees have been retained in the Study Area as the land has been used as part of the Grafton Gaol and Correctional Facility site since at least the late 1800's. Sterling Brown was not familiar with any sites in the local area- other than those recorded on the AHIMS database.

4.3 Potential of landform to contain Aboriginal sites:

The Study Area comprises alluvial deposits of the Clarence River. In northern NSW the low-lying river valleys were not typically used as campsites as they were mostly inundated swamps or sub-tropical rainforests. It is noted by Sterling Brown that the Old Gaol and Grafton Hospital were selected on the highest ground nearby to Grafton and that while Alamy Creek does back up during floods, however the Study Area is known to be mostly flood free. It is typical that Aboriginal campsites were located on dry ridges and hills above the floodplain in forest types which comprised open hardwood forests- which around Grafton included the elevated ground at Centenary Drive to the south of the Clarence River and the elevated range north of Grafton through Junction Hill/ Summerland Way.

4.4 Proximity to landforms with the potential to contain Aboriginal sites

The Due Diligence Code of Practice outlines a number of landforms which have an elevated potential to contain Aboriginal archaeological sites, including land:

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

The Study Area is located on the edge of the floodplain and is not situated on a landform identified by the Due Diligence Code of Practice as having an elevated potential to contain Aboriginal archaeological sites. Alamy Creek is a palaeochannel of the Clarence- and as such this feature would have been seasonally inundated and waterlogged but is in an environment which has numerous available swamp and creeks.

4.5 Previous disturbance history

For the purposes of the assessment the Study Area has been disturbed within the meaning of Due Diligence Code of Practice (DECCW 2010A:18), being:

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

The analysis of historical aerial photos show that the Study Area has been subject to historical disturbance during the construction and operation of the Grafton Base Hospital and the construction and operation of the Grafton Correctional Facility in the late 1980s that would significantly disturb or remove the upper soil profile with the greatest potential to contain Aboriginal archaeological deposits. The site inspection has confirmed that the ground has been significantly disturbed.

4.6 Site inspection

A site inspection was undertaken with Grafton Ngerrie LALC Senior Sites officer, Mr. Sterling brown, on 25 July 2023 (see **Figure 17- Figure 24**). Sterling was familiar with the cultural landscape of the Clarence River and identifies as a Bundjalung and Gumbayngirr man. The Hospital and gaol sites were specifically identified by Sterling as being on an elevated levee bank and generally up off the lower floodplain- this was a consideration relevant to the study as the higher ground was more likely to contain Aboriginal sites. However, it was generally understood that Aboriginal campsites were located on the riverbank or up on the elevated ranges and drier country away from the floodplain. Sterling was familiar with the historic and archaeological sites identified on the AHIMS and noted that they were discrete sites that did not extend into the Study Area. It was noted that the proposed early works would not have a significant change to the landscape and that the works would not affect ground which had not already been disturbed. It was also noted that the hospital was important for the Aboriginal community and that the redevelopment would have positive outcomes for Aboriginal people in the region.

4.7 Requirement for Archaeological Investigation

The *Code of practice for the archaeological investigation of Aboriginal objects in NSW* (DECCW 2010B) requires that archaeological excavation should be undertaken under the following circumstances:

“sub-surface Aboriginal objects with potential conservation value have a high probability of being present in an area, and the area cannot be substantially avoided by the proposed activity”

When applied across north-eastern NSW, archaeological sites of conservation value would include those types of archaeological sites which are either rare or of deeper significance to the Aboriginal community, including burials, ceremonial sites such as stone arrangements and birthing places, rock art sites, shell middens, scarred or carved trees and historic sites associated with Aboriginal reserves or “fringe” camps. The Due Diligence assessment has concluded that it is not likely that the Study Area contains a Aboriginal archaeological site of conservation value. As such an additional archaeological investigation is not required.

5 CONCLUSIONS AND RECOMMENDATIONS

The Aboriginal cultural heritage (Due Diligence) assessment has concluded that the Grafton Base Hospital redevelopment early works will not likely result in harm to Aboriginal objects. As such an AHIP and additional archaeological excavation is not required, and the works can proceed under the Due Diligence approval pathway (NPW Act 1974 Section 87(2)). However, it is recommended that an Aboriginal Objects Find Procedure is put in place as a precautionary measure.

Recommendation 1: Aboriginal Objects Find Procedure

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

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

Recommendation 2: Aboriginal Human Remains

It is unlikely that human remains will be located at any stage during ground works within the Project Area. However, should this event arise, all works must halt in the immediate area to prevent any further impacts to the remains. The burial site should be cordoned off and the remains themselves should be left untouched. The nearest police station (Grafton), Grafton Ngerrie LALC (South Grafton) and Heritage NSW (Parramatta) are all to be notified as soon as possible. If the remains are found to be of Aboriginal origin and the police do not wish to investigate the site for criminal activities, the Aboriginal community and the Heritage NSW should be consulted as to how the remains should be dealt with. Work may only resume after agreement is reached between all parties, provided it is in accordance with all parties' statutory obligations.

6 REFERENCES

Department of Environment, Climate Change and Water,

2010A *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW*

2010B *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*

Mitchell, P

2002 *Descriptions for NSW (Mitchell) Landscapes Version 2 (2002)*. Department of Environment and Climate Change, Sydney.

NSW Spatial Collaboration Portal

1950 Aerial Photo

<https://portal.spatial.nsw.gov.au/download/historic/GW200/GW200_17_004.jp2.jpeg>

1963 Aerial Photo

<https://portal.spatial.nsw.gov.au/download/historic/1285/1285_4G_165.jp2.jpeg>

1970 Aerial Photo

< https://portal.spatial.nsw.gov.au/download/historic/1672/1672_03_022.jp2.jpeg>

1978 Aerial Photo

< https://portal.spatial.nsw.gov.au/download/historic/2819/2819_02_130.jp2.jpeg>

1990 Aerial Photo


<https://portal.spatial.nsw.gov.au/download/historic/3789/3789_05_173.jp2.jpeg>

Office of Environment and Heritage

2011 *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*



APPENDIX A: AHIMS SEARCH RESULTS



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : TH108 Grafton base Hospit
Client Service ID : 801012

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
12-6-0219	Restriction applied. Please contact ahims@environment.nsw.gov.au.					Open site	Valid			
	<u>Contact</u>	<u>Recorders</u>	Mrs.Lisa Southgate					<u>Permits</u>		
12-6-0408	4 Mile-Mod Tree 1	GDA	56	499536	6715989	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd,Mx.Sam Cooling					<u>Permits</u>		
12-6-0422	4Mile-ASF4	GDA	56	499565	6716024	Open site	Valid	Artefact :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd,Mx.Sam Cooling					<u>Permits</u>		
12-6-0412	CL-Bora -1	GDA	56	499569	6713898	Open site	Valid	Ceremonial Ring (Stone or Earth) :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd,Mx.Sam Cooling					<u>Permits</u>		
12-6-0410	4Mile-Mod Tree 3	GDA	56	499678	6715893	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd,Mx.Sam Cooling					<u>Permits</u>		
12-6-0418	4Mile-ISF4	GDA	56	499825	6713259	Open site	Destroyed	Artefact :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd,Curio Projects Pty Ltd,Curio Projects Pty Ltd,Mx.Sam Cooling					<u>Permits</u>	4422	
12-6-0215	Southampton 1;	AGD	56	488800	6712900	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	
	<u>Contact</u>	<u>Recorders</u>	Mr.T Donnelly					<u>Permits</u>		
12-6-0402	ALIPOU SCT2	GDA	56	494902	6713701	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>	<u>Recorders</u>	Miss.Melanie (Duplicate of #6086) Thomson,Biosis Pty Ltd - Sydney					<u>Permits</u>		
13-4-0218	4Mile-Burial 1	GDA	56	500253	6713652	Open site	Valid	Burial :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd,Mx.Sam Cooling					<u>Permits</u>		
13-4-0070	Ulmarra, Southgate 1	AGD	56	500300	6718920	Open site	Valid	Burial :-	Burial/s	1071
	<u>Contact</u>	<u>Recorders</u>	Harry Creamer,Ray Kelly,Mr.T Donnelly,Harold Marsh,Bonhomme Craib & Associat					<u>Permits</u>		
12-6-0426	GFTAD04	GDA	56	488603	6716331	Open site	Valid	Artefact :-		
	<u>Contact</u>	<u>Recorders</u>	Biosis Pty Ltd - Wollongong,Biosis Pty Ltd - Wollongong,Mrs.Samantha Keats,Mrs.S					<u>Permits</u>		
12-6-0425	GFTAD05	GDA	56	488634	6716300	Open site	Valid	Artefact :-		
	<u>Contact</u>	<u>Recorders</u>	Biosis Pty Ltd - Wollongong,Biosis Pty Ltd - Wollongong,Mrs.Samantha Keats,Mrs.S					<u>Permits</u>		
12-6-0411	CL-Complex	GDA	56	499765	6714535	Open site	Valid	Burial :- , Ceremonial Ring (Stone or Earth) :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd,Mx.Sam Cooling					<u>Permits</u>		

Report generated by AHIMS Web Service on 17/07/2023 for Tim Hill for the following area at Lat, Long From :-29.7184, 152.8813 - Lat, Long To :-29.6438, 153.0049. Number of Aboriginal sites and Aboriginal objects found is 43

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Page 1 of 4

Report generated by AHIMS Web Service on 17/07/2023 for Tim Hill for the following area at Lat, Long From :-29.7184, 152.8813 - Lat, Long To :-29.6438, 153.0049. Number of Aboriginal sites and Aboriginal objects found is 43

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Page 1 of 4



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : TH108 Grafton base Hospit

Client Service ID : 801012

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
12-6-0338	Carr's Creek Camp	AGD	56	491838	6718075	Open site	Valid	Habitation Structure : -, Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>							<u>Recorders</u>	Ms.Katrina Stankowski	<u>Permits</u>
12-6-0216	Goorie Park;	AGD	56	494100	6715850	Open site	Valid	Modified Tree (Carved or Scarred) : -	Scarred Tree	
	<u>Contact</u>							<u>Recorders</u>	Mrs.Lisa Southgate	<u>Permits</u>
12-6-0401	ALIPOU SCT1	GDA	56	495089	6714114	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>							<u>Recorders</u>	Miss.Melanie (Duplicate of #6086) Thomson,Biosis Pty Ltd - Sydney	<u>Permits</u>
12-6-0327	Restriction applied. Please contact ahims@environment.nsw.gov.au.					Open site	Valid			
	<u>Contact</u>								Grafton Ngerrie Local Aborigin	<u>Permits</u>
12-6-0415	CCCTL-PAD5	GDA	56	499370	6715757	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>							<u>Recorders</u>	Curio Projects Pty Ltd,Mx.Sam Cooling	<u>Permits</u>
12-6-0417	CCCTL-PAD3	GDA	56	497721	6716168	Open site	Partially Destroyed	Artefact : -, Potential Archaeological Deposit (PAD) : -		
	<u>Contact</u>							<u>Recorders</u>	Curio Projects Pty Ltd,Curio Projects Pty Ltd,Curio Projects Pty Ltd,Mx.Sam Cooling	<u>Permits</u> 4422
12-6-0427	GFTAD06	GDA	56	488662	6716275	Open site	Valid	Artefact : -		
	<u>Contact</u>							<u>Recorders</u>	Biosis Pty Ltd - Wollongong,Biosis Pty Ltd - Wollongong,Mrs.Samantha Keats,Mrs.S	<u>Permits</u>
12-6-0400	ALIPOU OC1	GDA	56	495451	6713537	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	<u>Contact</u>							<u>Recorders</u>	Miss.Melanie (Duplicate of #6086) Thomson,Biosis Pty Ltd - Sydney	<u>Permits</u>
12-6-0409	4Mile-Mod Tree 2	GDA	56	499669	6715808	Open site	Valid	Modified Tree (Carved or Scarred) : 1		
	<u>Contact</u>							<u>Recorders</u>	Curio Projects Pty Ltd,Mx.Sam Cooling	<u>Permits</u>
13-4-0211	4Mile-ISF3	GDA	56	500224	6712977	Open site	Destroyed	Artefact : -		
	<u>Contact</u>							<u>Recorders</u>	Curio Projects Pty Ltd,Curio Projects Pty Ltd,Mx.Sam Cooling,Mx.Sam Cooling	<u>Permits</u> 4422
13-4-0206	CL-Bora -2	GDA	56	500452	6714966	Open site	Valid	Ceremonial Ring (Stone or Earth) : -		
	<u>Contact</u>							<u>Recorders</u>	Curio Projects Pty Ltd,Mx.Sam Cooling	<u>Permits</u>
12-6-0428	GFTAD03	GDA	56	488896	6716240	Open site	Valid	Artefact : -		
	<u>Contact</u>							<u>Recorders</u>	Biosis Pty Ltd - Wollongong,Biosis Pty Ltd - Wollongong,Mrs.Samantha Keats,Mrs.S	<u>Permits</u>

Report generated by AHIMS Web Service on 17/07/2023 for Tim Hill for the following area at Lat, Long From : -29.7184, 152.8813 - Lat, Long To : -29.6438, 153.0049. Number of Aboriginal sites and Aboriginal objects found is 43

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : TH108 Grafton base Hospit

Client Service ID : 801012

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
12-6-0420	4Mile-ISF1	GDA	56	498556	6713452	Open site	Destroyed	Artefact :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd, Curio Projects Pty Ltd, Mx.Sam Cooling, Mx.Sam Cooling					<u>Permits</u>	4422	
12-6-0421	4Mile-AS3	GDA	56	498952	6713358	Open site	Destroyed	Artefact :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd, Curio Projects Pty Ltd, Curio Projects Pty Ltd, Mx.Sam Cooling					<u>Permits</u>	4422	
12-6-0419	4Mile-ISF2	GDA	56	499058	6713376	Open site	Destroyed	Artefact :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd, Curio Projects Pty Ltd, Mx.Sam Cooling, Mx.Sam Cooling					<u>Permits</u>	4422	
12-6-0414	CCCTL-PAD6	GDA	56	500083	6713384	Open site	Valid	Potential Archaeological Deposit (PAD) :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd, Mx.Sam Cooling					<u>Permits</u>	4422	
13-4-0213	4Mile-Bora	GDA	56	500427	6712781	Open site	Valid	Ceremonial Ring (Stone or Earth) :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd, Mx.Sam Cooling					<u>Permits</u>		
12-6-0429	GFTAD02	GDA	56	488981	6716244	Open site	Valid	Artefact :-		
	<u>Contact</u>	<u>Recorders</u>	Biosis Pty Ltd - Wollongong, Biosis Pty Ltd - Wollongong, Mrs.Samantha Keats, Mrs.S					<u>Permits</u>		
12-6-0157	CH-G 47;	AGD	56	489400	6713030	Open site	Valid	Artefact :-	Open Camp Site	1726
	<u>Contact</u>	<u>Recorders</u>	Kerry Navin					<u>Permits</u>		
12-6-0326	Restriction applied. Please contact ahims@environment.nsw.gov.au.					Open site	Valid			
	<u>Contact</u>	<u>Recorders</u>	Mrs.Lisa Southgate					<u>Permits</u>		
12-6-0345	Dovedale Scar tree	AGD	56	494591	6714889	Open site	Valid	Modified Tree (Carved or Scarred) :-		
	<u>Contact</u>	<u>Recorders</u>	Mrs.Lisa Southgate					<u>Permits</u>		
12-6-0424	4Mile-AS1	GDA	56	499493	6715474	Open site	Destroyed	Artefact :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd, Curio Projects Pty Ltd, Curio Projects Pty Ltd, Mx.Sam Cooling					<u>Permits</u>	4422	
12-6-0413	CCCTL-PAD7	GDA	56	499562	6713953	Open site	Valid	Potential Archaeological Deposit (PAD) :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd, Mx.Sam Cooling					<u>Permits</u>		
12-6-0416	CCCTL-PAD4	GDA	56	499657	6714882	Open site	Valid	Potential Archaeological Deposit (PAD) :-		
	<u>Contact</u>	<u>Recorders</u>	Curio Projects Pty Ltd, Mx.Sam Cooling					<u>Permits</u>		
12-6-0430	GFTAD01	GDA	56	489077	6716198	Open site	Valid	Artefact :-		
	<u>Contact</u>	<u>Recorders</u>	Biosis Pty Ltd - Wollongong, Biosis Pty Ltd - Wollongong, Mrs.Samantha Keats, Mrs.S					<u>Permits</u>		
12-6-0352	South Grafton Fringe Camp 1	AGD	56	494542	6712450	Open site	Valid	Habitation Structure : 1		
	<u>Contact</u> T Russell	<u>Recorders</u>	Ms.Katrina Stankowski					<u>Permits</u>		

Report generated by AHIMS Web Service on 17/07/2023 for Tim Hill for the following area at Lat, Long From : -29.7184, 152.8813 - Lat, Long To : -29.6438, 153.0049. Number of Aboriginal sites and Aboriginal objects found is 43

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : TH108 Grafton base Hospit

Client Service ID : 801012

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
12-6-0086	Grafton Marriage Trees	AGD	56	495250	6713850	Open site	Valid	Modified Tree (Carved or Scarred) : -	Carved Tree	1893
	<u>Contact</u>									
		<u>Recorders</u>	Harry Creamer						<u>Permits</u>	
12-5-0005	Swan Creek Burial Grafton	AGD	56	498600	6716500	Open site	Valid	Burial : -	Burial/s	
	<u>Contact</u>									
		<u>Recorders</u>	Mr.Terry Donovan						<u>Permits</u>	
12-6-0423	4Mile-AS2	GDA	56	499493	6715531	Open site	Destroyed	Artefact : -		
	<u>Contact</u>									
		<u>Recorders</u>	Curio Projects Pty Ltd, Curio Projects Pty Ltd, Curio Projects Pty Ltd, Mx.Sam Cooling						<u>Permits</u>	4422
12-6-0158	CH-G 48;	AGD	56	490020	6713730	Open site	Valid	Artefact : -	Open Camp Site	1726
	<u>Contact</u>									
		<u>Recorders</u>	Kerry Navin						<u>Permits</u>	

**** Site Status****Valid** - The site has been recorded and accepted onto the system as valid**Destroyed** - The site has been completely impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There is nothing left of the site on the ground but proponents should proceed with caution.**Partially Destroyed** - The site has been only partially impacted or harmed usually as consequence of permit activity but sometimes also after natural events. There might be parts or sections of the original site still present on the ground**Not a site** - The site has been originally entered and accepted onto AHIMS as a valid site but after further investigations it was decided it is NOT an aboriginal site. Impact of this type of site does not require permit but Heritage NSW should be notified

Report generated by AHIMS Web Service on 17/07/2023 for Tim Hill for the following area at Lat, Long From : -29.7184, 152.8813 - Lat, Long To : -29.6438, 153.0049. Number of Aboriginal sites and Aboriginal objects found is 43

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7 CONSULTATION WITH GRAFTON NGERRIE LALC

8 July 2023- Email to Grafton Ngerrie LALC introducing the project

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

Sent: Saturday, July 8, 2023 11:11 AM

To: gnlalc2460@gmail.com

Cc: Carmel.Monaghan@health.nsw.gov.au; 'Simon Waterworth' <SimonW@geolink.net.au>

Subject: Site inspection/ preliminary meeting- Grafton Base Hospital

Good morning

I have been engaged to undertake the Aboriginal cultural heritage assessment to support the redevelopment of the Grafton Base Hospital. This includes reuse of part of the former Grafton Gaol site and demolition of some buildings from the Base Hospital. I will have drawings and plans coming in over the next few weeks and I will issue them to you via email.

However, is it possible to arrange a site inspection/ meeting with a Aboriginal sites officer on **Monday 24 July-**commencing 9am.

Please call on the mobile below if it is easier.

Tim Hill

Heritage Management & Planning

0473033615