

A decorative graphic of thin, light green topographic map contour lines is positioned on the left side of the page, extending from the top left towards the bottom left.

20 Heradale Parade, Batemans Bay NSW Aboriginal Heritage Report

Place Studio

DOCUMENT TRACKING

Project Name	20 Heradale Parade, Batemans Bay NSW – Aboriginal Heritage Report
Project Number	24SYD - 8128
Project Manager	Kate Storan
Prepared by	Kate Storan
Reviewed by	Jennifer Norfolk
Approved by	Karyn McLeod
Status	Final
Version Number	V2
Last saved on	24 October 2024

This report should be cited as ‘Eco Logical Australia, 2024. 20 Heradale Parade, Batemans Bay NSW – Aboriginal Heritage Report. Prepared for Place Studio.’

ACKNOWLEDGEMENTS

This document has been prepared by Eco Logical Australia Pty Ltd with support from Place Studio.

Disclaimer
This document may only be used for the purpose for which it was commissioned and in accordance with the contract between Eco Logical Australia Pty Ltd and Place Studio. The scope of services was defined in consultation with Place Studio, by time and budgetary constraints imposed by the client, and the availability of reports and other data on the study area. Changes to available information, legislation and schedules are made on an ongoing basis and readers should obtain up to date information. Eco Logical Australia Pty Ltd accepts no liability or responsibility whatsoever for or in respect of any use of or reliance upon this report and its supporting material by any third party. Information provided is not intended to be a substitute for site specific assessment or legal advice in relation to any matter. Unauthorised use of this report in any form is prohibited.

Contents

1. Introduction	1
1.1 Project background.....	1
1.2 Study area.....	1
1.3 Purpose and objectives of the archaeological assessment.....	1
1.4 Authorship	1
1.5 Legislative context	2
2. Consultation.....	7
2.1 Stage 1 – Notification of project proposal and registration of interest	7
2.1.1 Written request for information about Aboriginal organisations.....	7
2.1.2 Placement of advertisement in local newspaper.....	7
2.1.3 Letters to Aboriginal organisations.....	7
2.2 Stage 2 and Stage 3 - Presentation of information about the proposed project and gathering information about cultural significance	8
2.2.1 Project information and methodology	8
2.2.2 Archaeological test excavation	8
3. Environmental context	9
4. Aboriginal context	15
4.1 Ethnohistory	15
4.2 Archaeological context	16
4.2.1 Database searches.....	16
4.2.2 Archaeological investigations	17
5. Regional character and predictive model.....	25
5.1 Regional character	25
5.2 Predictive models	26
5.2.1 Site types.....	26
5.2.2 Site occurrence.....	27
6. Archaeological survey.....	29
6.1 Purpose.....	29
6.2 Survey strategy	29
6.2.1 Site definition and recording	29
6.2.2 Protocol for recording Potential Archaeological Deposits.....	30
6.3 Survey Results.....	30
6.3.1 Survey coverage.....	32

7. Archaeological Test Excavations.....	35
7.1 Introduction.....	35
7.2 Research Design.....	35
7.3 Test Excavation Methodology.....	35
7.4 Test excavation results	37
8. Analysis and discussion.....	44
9. Impact assessment	45
10. Recommendations.....	46
References	47
Appendix A – AHIMS Search Results.....	49
Appendix B – Consultation Record	57

List of Figures

Figure 1: The study area, 20 Heradale Parade	4
Figure 2: Ground floor plan of the proposed works (Source: Place Studio 2024)	5
Figure 3: Section plan of the proposed works (Source: Place Studio 2024)	6
Figure 4: Hydrology within the study area	11
Figure 5: 1964 historic aerial of study area.....	12
Figure 6: 1977 historic aerial of study area.....	13
Figure 7: 1991 historic aerial of study area.....	14
Figure 8: Registered AHIMS sites within proximity to the study area	23
Figure 9: Regional overview of AHIMS sites surrounding the study area.....	24
Figure 10: View west from south-eastern corner of study area, showing single storey residence and modified gravel driveway.....	31
Figure 11: View south towards Bavarde Avenue from south-eastern corner of study area, showing single storey residence, fencing and dense grass in backyard.....	31
Figure 12: View north-west showing gravel driveway, remnant trees and mixed deposits of orange-brown sandy loams, gravel and rock.....	31
Figure 13: View west showing disturbance in south-eastern corner of study area.....	31
Figure 14: View north showing dense grass cover in northern portion of study area and remnant trees along steep slope along western boundary	31
Figure 15: View west showing dense grass cover and remnant trees along steep slope along western boundary of study area	31
Figure 16: View north showing relatively undisturbed landform and dense grass covering northern portion of study area.....	32
Figure 17: View south towards Bavarde Avenue showing modified landform.....	32
Figure 18: Survey coverage and tracks for the study area.....	33
Figure 19: Areas of potential identified during the survey for the study area and proposed test pit locations	34

Figure 20: View north showing surface disturbance from activities undertaken between survey and test excavations.....	37
Figure 21: Plan view of Test Pit 1 showing damp water table at base of pit	39
Figure 22: Location of Test Pit 1, looking north-west	39
Figure 23: Profile view of Test Pit 2 showing clear boundaries between topsoil (A Horizon) and marine beach sand layer (B Horizon)	39
Figure 24: Plan view of Test Pit 2	39
Figure 25: Plan view of Test Pit 5	39
Figure 26: Location of Test Pit 5, view south-west	39
Figure 27: Profile view of Test Pit 3 showing layer of historic fill above natural soils	41
Figure 28: Location of Test Pit 3 along fence line, view south-east.....	41
Figure 29: Profile view of Test Pit 5.....	41
Figure 30: Profile view of Test Pit 7.....	41
Figure 31: Location of Test Pit 7, view north-west.....	41
Figure 32: Plan view of Test Pit 10	41
Figure 33: Profile view of Test Pit 10 showing shallow soils and clear transition to marine beach sand layer.....	42
Figure 34: Location of Test Pit 10, view west.....	42
Figure 35: Plan view of Test Pit 12	42
Figure 36: Profile view of Test Pit 12 showing layer of historic fill in topsoil	42
Figure 37: Location of test pits excavated; no Aboriginal objects identified.....	43

List of Tables

Table 1: Registered Aboriginal Parties	7
Table 2: Methodology responses	8
Table 3: Test Excavation Personnel.....	8
Table 4: Bateman subregion located within the study area (source: NSW Department of Planning and Environment 2024).....	9
Table 5: Search parameters for the AHIMS database search and results.....	16
Table 6: Frequencies of site types.....	17
Table 7: Predictive model for the occurrence of archaeological site types in the study area.....	27
Table 8: Survey coverage	32
Table 9: Landform summary	32
Table 10: Soil summary for test pits 1,2,4-6,8	38
Table 11: Soil summary for test pits 3, 7, 9, 10 and 12	40

Executive Summary

Eco Logical Australia (ELA) have been engaged by Place Studio to undertake Aboriginal heritage investigations for 20 Heradale Parade (Lot 1 DP1135117) Batemans Bay, NSW. This assessment will be used to inform the proposed development of the property, which would involve the demolition of the existing buildings and construction of three, four level apartment blocks. Associated works will include bulk excavations for the provision of basement parking and landscaping.

ELA previously prepared an Aboriginal Heritage Due Diligence Assessment (ELA 2024) which identified no known Aboriginal objects or places but due to the environmental context the study area was identified as a sensitive landform with the potential to contain Aboriginal objects and required further archaeological investigations (Figure 19).

An archaeological survey was undertaken with Uncle Bill Davis representing Batemans Bay Local Aboriginal Land Council. No Aboriginal objects were identified during the survey however it was recommended to undertake a test excavation program to identify whether there were subsurface Aboriginal objects or other features of Aboriginal occupation or utilisation.

Archaeological test excavations were completed resulting in no Aboriginal objects being identified. The soil profiles exhibited very low disturbance below the top 100mm, with the extent of the test pit exposing marine sands indicating the study area was either a coastal tributary or beach. Two test pits did indicate deeper historical disturbance with plastic, glass, mixed clays and brick fragments excavated up to 400m in depth.

This Aboriginal heritage assessment was completed in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010) and Aboriginal community consultation was initiated as a pre requisite to undertaking the test excavation program in accordance with the *Code of Practice* and *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010).

The results of the investigations have identified that Aboriginal objects or places will not be impacted by the proposed development. An Aboriginal Heritage Impact Permit is not required prior to undertaking the proposed works.

ELA has carried out the relevant due diligence process and the necessary archaeological investigations to ensure Aboriginal objects or places are not harmed by the proposed development. An Unexpected Finds Procedure should be implemented for construction activities.

1. Introduction

1.1 Project background

Eco Logical Australia (ELA) have been engaged by Place Studio to undertake an Aboriginal Heritage Report for 20 Heradale Parade (Lot 1 DP1135117) Batemans Bay, NSW (hereafter referred to as 'the study area; Figure 1). This assessment will be used to inform the proposed development of the property, which would involve the demolition of the existing buildings and construction of three, four level apartment blocks. Associated works will include bulk excavations for the provision of basement parking and landscaping.

ELA previously prepared an Aboriginal Heritage Due Diligence Assessment (ELA 2024) which identified no known Aboriginal objects or places but due to the environmental context the study area was identified as a sensitive landform with the potential to contain Aboriginal objects and required further archaeological investigations (Figure 19).

1.2 Study area

The study area comprises 20 Heradale Parade (Lot 1 DP1135117), Batemans Bay NSW (Figure 1). The study area is located east of the Clyde River, the estuarine wetlands and on the south side of Batemans Bay. The study area is located in the Eurobodalla Shire Local Government Area (LGA) in the Parish of Bateman, County of St Vincent and falls within the Batemans Bay Local Aboriginal Land Council (LALC) boundaries.

A plan of the proposed works has been provided by Place Studio (Figure 2 and Figure 3).

1.3 Purpose and objectives of the archaeological assessment

The purpose of the archaeological investigation is to understand the presence, nature, and extent of the Aboriginal archaeological resource within the area of proposed works. The cataloguing and analysis of the recovered artefacts, if present, will inform the scientific, cultural, and historical significance of the site and in turn management of the heritage resource.

This assessment has been undertaken in accordance with the Heritage NSW, Department of Climate Change, Energy, the Environment and Water (Heritage NSW) *Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010a).

1.4 Authorship

This assessment has been prepared by ELA Archaeologist Kate Storan. It was reviewed by ELA Senior Archaeologist Jennifer Norfolk.

Kate Storan has a BA (Archaeology) from Macquarie University and Jennifer Norfolk has an MSc. (Marine Archaeology) from Southampton University.

1.5 Legislative context

NATIONAL PARKS AND WILDLIFE ACT 1974

Aboriginal cultural heritage in NSW is afforded protection under the provisions of the *National Parks and Wildlife Act 1974* (NSW) [NPW Act]. The Act is administered by Heritage NSW, which has responsibilities under the legislation for the proper care, preservation, and protection of ‘Aboriginal objects’ and ‘Aboriginal places’.

Under the provisions of the NPW Act, all Aboriginal objects are protected irrespective of their level of significance or issues of land tenure. Aboriginal objects are defined by the Act as, *any deposit, object or material evidence (that is not a handicraft made for sale) relating to Aboriginal habitation of NSW, before or during the occupation of that area by persons of non-Aboriginal extraction (and includes Aboriginal remains)*. Aboriginal objects are limited to physical evidence and may be referred to as ‘Aboriginal sites’, ‘relics’ or ‘cultural material’. Aboriginal objects can include scarred trees, artefact scatters, middens, rock art and engravings, as well as post-contact sites and activities such as fringe camps and stockyards. Heritage NSW must be notified about the discovery of Aboriginal objects under section 89A of the NPW Act.

Part 6 of the NPW Act provides specific protection for Aboriginal objects and places by making it an offence to destroy, deface, damage, or move them from the land. *The Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (CoP) (DECCW 2010b) as adopted by the *National Parks and Wildlife Regulation 2019* (NPW Regulation) made under the NPW Act, provides guidance to individuals and organisations to exercise due diligence when carrying out activities that may harm Aboriginal objects. The CoP also determines whether proponents should apply for consent in the form of an Aboriginal Heritage Impact Permit (AHIP) under section 90 of the Act. The CoP can be used for all activities across all environments. The NPW Act provides that a person who exercises due diligence in determining that their actions will not harm Aboriginal objects has a defence against prosecution for the strict liability offence if they later unknowingly harm an object without an AHIP. However, if an Aboriginal object is encountered in the course of an activity work must cease and an application should be made for an AHIP.

The *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a) assists in establishing the requirements for undertaking archaeological investigation without an AHIP or establishing the requirements that must be followed when carrying out archaeological investigation in NSW where an application for an AHIP is likely to be made. Heritage NSW recommends that the requirements of this Code also be followed where a proponent may be uncertain about whether or not their proposed activity may have the potential to harm Aboriginal objects or declared Aboriginal places.

Heritage NSW was notified in writing of the commencement, location and dates of the test excavation and provided with a copy of the sampling strategy in line with Requirement 15c in the Code of Practice.

ABORIGINAL LAND RIGHTS ACTS 1983

The *Aboriginal Land Rights Act 1983* (ALR Act) established Aboriginal Land Councils (at State and Local levels). Division 1A outlines the functions of Local Aboriginal Land Councils and their statutory obligation under the ALR Act to:

- (a) take action to protect the culture and heritage of Aboriginal persons in the council's area, subject to any other law, and
- (b) promote awareness in the community of the culture and heritage of Aboriginal persons in the council's area.

The study area is within the boundary of the Batemans Bay Local Aboriginal Land Council (LALC).

ENVIRONMENTAL PLANNING & ASSESSMENT ACT 1979

The *Environmental Planning and Assessment Act 1979* (NSW) [EP&A Act] requires that consideration is given to environmental impacts as part of the land use planning process. In NSW, environmental impacts are interpreted as including cultural heritage impact. Proposed activities and development are considered under different parts of the EP&A Act, including:

- Major projects (State Significant Development under Part 4.1 and State Significant Infrastructure under Part 5.1), requiring the approval of the Minister for Planning.
- Minor or routine developments, requiring local council consent, are usually undertaken under Part 4. In limited circumstances, projects may require the Minister's consent.
- Part 5 activities which do not require development consent. These are often infrastructure projects approved by local councils or the State agency undertaking the project.

The EP&A Act also controls the making of environmental planning instruments (EPIs) such as Local Environmental Plans (LEPs) and State Environmental Planning Policies (SEPPs). LEPs commonly identify and have provisions for the protection of local heritage items and heritage conservation areas.

Planning decisions within LGAs are guided by Local Environmental Plans (LEPs). Each LGA is required to develop and maintain a LEP that includes Aboriginal and historical heritage items which are protected under the EP&A Act and the *Heritage Act 1977*. The study area is located in the Eurobodalla Shire LGA and is subject to consents under the Eurobodalla LEP 2012. One of the aims of the Eurobodalla LEP 2012, Part 5.10, Clause 1 (a) and (d) is to 'to conserve the environmental heritage of Eurobodalla and 'to conserve Aboriginal objects and Aboriginal places of heritage significance'.

Under Part 5, Clause 5.10 (2) development consent is therefore required for:

- (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)—
 - (ii) an Aboriginal object,
- (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



Figure 1: The study area, 20 Heradale Parade



Figure 2: Ground floor plan of the proposed works (Source: Place Studio 2024)



Figure 3: Section plan of the proposed works (Source: Place Studio 2024)

2. Consultation

Prior to undertaking test excavations, Aboriginal consultation was undertaken in accordance with Requirement 15 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a). Consultation with registered Aboriginal parties was conducted in line with *Heritage NSW Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010c). This has ensured that Aboriginal stakeholders have been able to register and therefore be fully engaged on all aspects relating to cultural heritage for this project.

2.1 Stage 1 – Notification of project proposal and registration of interest

2.1.1 Written request for information about Aboriginal organisations

On behalf of the proponent, ELA undertook a registration process for Aboriginal people with knowledge of the area. ELA wrote to the following organisations (as per 4.1.2 Consultation) on 5 April 2024, in order to identify Aboriginal people who may hold cultural knowledge relevant to determining the significance of Aboriginal objects:

- Heritage NSW
- The Registrar, Aboriginal Land Rights Act 1983
- The National Native Title Tribunal
- Native Title Services Corporation Limited (NTSCORP Limited)
- Eurobodalla Shire Council
- Batemans Bay Local Aboriginal Land Council.

Details of the letters and organisational responses are included in Appendix A.

2.1.2 Placement of advertisement in local newspaper

An online advertisement was placed in the Bay Post on 17 April 2024 inviting interested Aboriginal stakeholders to register to be consulted in relation to the proposed works.

2.1.3 Letters to Aboriginal organisations

As per 4.1.3 of the *Consultation Requirements*, ELA wrote to the Aboriginal organisations identified through the above process on 22 April 2024 inviting them to register an interest in the project. The registration closing date was 6 May 2024; it is ELAs policy to accept any registrations after this date. Registrants became the Registered Aboriginal Parties (RAPs) for the project. Table 1 below details the RAPs for the project.

Table 1: Registered Aboriginal Parties

Organisation	Contact Name	Date
Clive Freeman	Clive Freeman	22/04/2024
Girragirra Murun Aboriginal Corporation	Diana Astin	22/04/2024
Didge Ngunawal Clan	Paul Boyd & Lilly Carroll	22/04/2024
Thoorga Nura	John Carriage	22/04/2024
Batemans Bay Local Aboriginal Land Council (LALC)	Ros Carriage	22/04/2024

Organisation	Contact Name	Date
Corroboree Aboriginal Corporation	Marilyn Carroll-Johnson	23/04/2024
Goobah Development	Basil Smith	29/04/2024
Guntawang Aboriginal Resources Incorporated	Wendy Morgan	8/05/2024

Section 4.1.4 of the DECCW's *Aboriginal cultural heritage consultation requirements for proponents 2010* requires a minimum of 14 days for Aboriginal stakeholders to register their interest to be consulted.

2.2 Stage 2 and Stage 3 - Presentation of information about the proposed project and gathering information about cultural significance

2.2.1 Project information and methodology

Following the registration of Aboriginal parties and site survey, ELA presented the proposed project information, archaeological survey results and test excavation methodology to the RAPs for review, with a request for any cultural knowledge or cultural values that might be present in the study area. This information was sent to the RAPs on stage was sent on 16 May 2024, with a close of review period on 13 June 2024.

Table 2: Methodology responses

Organisation	Date	Response
Girragirra Murun Aboriginal Corporation	14/06/2024	At this stage Girra have no comments to add. Girragirra would like to be considered for fieldwork.
Didge Ngunawal Clan	16/05/2024	We are all happy from our end with your methodology.
Corroboree Aboriginal Corporation	5/06/2024	Supports methodology.
Thoorga Nura	16/05/2024	Thanks for providing the methodology report. It looks great. I have no comments to add.
Guntawang Aboriginal Resources Incorporated	20/05/2024	Supports methodology.

2.2.2 Archaeological test excavation

Test excavations were conducted by ELA Archaeologists, with assistance from the following organisations (Table 3) over 3 days (1 – 3 July 2024). Two RAP groups participated in all aspects of the field program.

Table 3: Test Excavation Personnel

Organisation	Personnel
ELA	Jennifer Norfolk; Kate Storan
Batemans Bay LALC	Les Simon
Thoorga Nura	Will Raymond

3. Environmental context

Landscape, geomorphic history, and extent of disturbance within a given area all play a role in the presence and/or preservation of Aboriginal objects. As outlined in the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010a), this section aims to assist in the prediction of:

- The potential of the landscape to contain Aboriginal objects; and
- The ways Aboriginal people have used the landscape in the past, with reference to the presence of resource areas, surfaces for art and other focal points which may have been used for particular activities and settlement; and
- Disturbance, including historical land-use, which may have removed earlier archaeological evidence; and
- The likely distribution of the material traces of Aboriginal land use based on the above.

To investigate these elements, this section focuses on the environmental context of the current study area, including geomorphology and soils, vegetation, hydrology, and previous land use to identify potential disturbance.

The study area is located within the Bateman subregion of the NSW Southeast Corner bioregion. A summary of the geology, landforms, soils and vegetation typical within this subregion is provided in Table 4 below:

Table 4: Bateman subregion located within the study area (source: NSW Department of Planning and Environment 2024)

Bateman Subregion	
Geology	Tightly folded fine grained Ordovician metamorphic rocks with several intrusions of granite. Western margin is a tight synclinal fold in Devonian sandstone and siltstone. Small areas of Tertiary basalt and quartz sands behind the coastal headlands. Quaternary alluvium on main valley floors and in the estuaries.
Characteristic Landforms	Steep hills below the Great escarpment, oriented north-south and controlled by rock structure. Lines of hills become lower toward the coast with a slight upturn along the coastal margin. Coastal barrier systems are small and estuarine fills limited.
Typical Soils	Mostly texture contrast soils. Red clay subsoils with thin topsoil on metamorphic rocks, deeper coarser grained profiles on granite. Red brown structured loams on basalt and deep siliceous sands with some podsol development on Tertiary sands and coastal dunes.
Vegetation	Hakea, melaleuca, coast rosemary and dwarfed red bloodwood heath on headlands. Red bloodwood and spotted gum forests to 300m. Yellow stringybark, grey ironbark and Woollybutt to 550 m. Brown barrel, black ash, Sydney peppermint, large-fruited red mahogany, Sydney blue gum and monkey gum to 900m, then snow gum.

No comprehensive soil landscape studies have been undertaken in the Batemans Bay region, and as such, information regarding the soil types has been gathered from previous studies within the area, and the NSW Department of Planning and Environment NSW Bioregions study.

The study area is located along the South Coast of NSW, an environment which comprises mostly textured contrast soils, red brown structured loams on basalt and deep siliceous sands, with some

podsol development on tertiary sands and coastal dunes. Geotechnical soil samples taken approximately 1km to the west of the study area characterise the underlying geology as a tidal flat under a swamp complex on alluvium, clay and sand lithology, with a soft surface condition and low local relief (<9m).

The A Horizon (<10cm) comprises a dark greyish and yellow brown light, sandy clay, with some weathered orange and yellow mottles; the A2 Horizon (<30cm) comprises a greyish brown sandy clay and the B Horizon (30cm-2m) comprises a very dark grey sandy clay and coarse clayey sand. These soils tend to be poorly drained and prone to slight erosional hazards (Survey 10000623, Profile 10 and 11; Tulau 1994).

HYDROLOGY

There are no permanent water sources within the study area. A first order tributary of Hanging Rock Creek runs approximately 250m to the south-east of the study area and flows into the Clyde River to the north (Figure 4).

Clyde River (*Bhundoo*) is located approximately 250m to the north-east of the study area and is an open, intermediate tide dominated drowned valley estuary that flows into the Tasman Sea at Batemans Bay. Batemans Bay is an open oceanic embayment that forms the mouth of the Clyde River, though the shoreline to the east of Batemans Bay has been reclaimed and is currently bound by a seawall.

VEGETATION

Batemans Bay would have been utilised for a vast range of coastal, flora and fauna resources. The study area has largely been cleared. Native vegetation in the vicinity of the study area includes hakea, melaleuca, coast rosemary and dwarfed red bloodwood heath on headlands, as well as red bloodwood, spotted gum forest and yellow stringybark. Other native species include grey ironbark, Woollybutt, brown barrel, black ash, Sydney peppermint, large-fruited red mahogany, Sydney blue gum, monkey gum and snow gum (State of NSW Department of Planning and Environment, 2024).

LAND USE HISTORY

Land development within the study area has been minimal and historical aerials from 1964 (Figure 5) and 1977 (Figure 6) show a vacant lot that has likely been cleared of vegetation except for a few trees along the slope. Localised disturbance related to natural erosional processes and vegetation clearance has occurred within the study area, and by 1989 (Figure 7) two residential buildings, a shed and a driveway have been constructed, indicating the south-eastern portion of the study area has been subject to moderate levels of disturbance.



Figure 4: Hydrology within the study area



Figure 5: 1964 historic aerial of study area



Figure 6: 1977 historic aerial of study area



Figure 7: 1991 historic aerial of study area

4. Aboriginal context

4.1 Ethnohistory

Dates of the earliest occupation of the continent by Aboriginal people are subject to continued revision as more research is undertaken. Lampert's (1971) excavation of the Burrill Lake, South Coast rock shelter, located to the north of the study area, has provided some of the earliest evidence for the occupation of south-eastern coastal New South Wales. Radiocarbon dates derived from wood charcoal present in the lowest occupation layers of the rock shelter yielded dates of $20,820 \pm 810$ and $20,760 \pm 800$ years Before Present (Lampert 1971:9; B.P.). The faunal remains from the site indicate that the local population were subsisting on a mixed coastal-bushland diet: whilst marine shell was present, there was a heavy emphasis on the faunal species available in the immediate vicinity of the shelter (Lampert 1971:12).

Ethnographic resources attribute the traditional custodians of Batemans Bay to the Walbanga people of the Yuin Nation. The Walbanga spoke dialects of the Thurga (*Durga*) language and occupied a territory '*between Cape Dromedary, north to near Ulladulla, at Braidwood, Araluen and Moruya and inland along the Shoal-Haven River*' (Tindale 1974). Early Australian ethnographer, Alfred Howitt recorded 12 separate groups of the Yuin Nation at the time of colonization, who would gather to celebrate, trade, share resources and exchange marriage partners (NPWS 2021).

Today, Aboriginal and Torres Strait Islander people make up 6.1% of the population of the Eurobodalla Shire. Strong cultural ties to the landscape are maintained through stories of the Dreaming. A sky deity, shared by numerous groups along south-eastern Australia is known as *Baiame* ('The Great Shaper', 'Thunder-God' or 'Great One'), who created the hills and rivers, and whose presence is felt most strongly along the rivers. Yuin Dreamtime stories describe the Creator *Baiame* and his son *Daramulun* (*Dharramullin*):

"Daramulun lived on earth with his mother Ngalaibal. Originally the earth was bare [...]. There were no men or women, but only animals, birds, or reptiles. He placed trees on the earth. After Kaboka, the thrush, caused a great flood, which covered all the coast country, there were no people left except some who crawled out of the water at Gulaga. He (Dharramullin) told the Yuin what to do, and he gave them the laws which the old people have handed down from father to son to this time. When a man dies and his Tulugal (spirit) goes away it is Dharramullin who meets it and takes care of it" (Howitt 1904).

Archaeological and historical evidence of traditional uses of the land and waterways links Batemans Bay to ancient travelling routes, including from Jebaicumbene to Batemans Bay and Murramarang, Murramarang to the Moruya River via Batemans Bay and along the Clyde (*Bhundoo*) River, which was utilised for resource collection and as a teaching place (Boot 2002 cited in Donaldson 2007). The importance of Batemans Bay as a travelling route was reiterated by Elder Bill Davis during the survey.

Proximity to the coast provided an abundance of marine resources, and the exploitation of shellfish is evident in middens along the coast. Inland, wallaby, kangaroo, black swans, rabbits, echidna, bush pigeons (*wanga*), eels (*Gunyu*) and other birds (*budjarn*) were hunted and natural resources such as sedge grass and spiky mat rush were utilised for basket making, inkweed and river oak as medicines, stringy bark for rope and lichen as fire starters (Donaldson 2007).

In 1770 Captain Cook sailed past in the Endeavour and noted ‘five Aboriginal men standing on the northern shore of Batemans Bay’, however contact with the European explorers did not occur in Batemans Bay until 1796, when men from the wrecked ‘Sydney Cove’ were assisted by local Aboriginal people. Though relations were initial peaceful, conflict arose in the early 1800s as explorers within the region increased (Donaldson 2007).

In the post-contact period, and as a result of wider European settlement in the region, the Batemans Bay Aboriginal Reservation was established in 1902, and fringe camps, including Pittman’s Camp at Cemetery Hill, were established. Aboriginal people found employment in the town, with jobs including saw milling, fishing, and seasonal farming as well as workers in shops and restaurants.

Despite these societal changes, Aboriginal people continued to reside in seasonally self-determined camps throughout the early to mid-1900s, including along Joes Creek, and Hanging Rock and the Clyde (*Bhundoo*) River held particular significance as meeting spots (Donaldson 2007). Elder Bill Davis noted during the archaeological survey that the local Aboriginal people continued to camp and gather traditional resources throughout the contact period, despite working for and with the European settlers.

Ultimately, throughout the period of European exploration and settlement in Batemans Bay, traditional methods of resource collection, including of *bimbalas* (Sydney Cockles), continued and continues in the region today.

4.2 Archaeological context

4.2.1 Database searches

AHIMS SEARCH

The AHIMS database is maintained by Heritage NSW and regulated under Section 90Q of the *National Parks and Wildlife Act 1974*. The AHIMS database holds information and records regarding the registered Aboriginal archaeological sites (Aboriginal objects, as defined under the Act) and declared Aboriginal places that exist in NSW.

A search of the AHIMS database was conducted on 16 April 2024 to identify if any registered Aboriginal sites were present within, or adjacent to, the study area (Appendix A). This represents the study area and 3km surrounding the study area.

Table 5: Search parameters for the AHIMS database search and results

Search Parameters		Search Result	
GDA Zone	56	Aboriginal sites recorded	117
Eastings	242173 - 248173	Aboriginal places declared	0
Northings	6041068 - 6047068		

No Aboriginal sites have previously been recorded within the study area (Figure 8). AHIMS ID 58-4-1581, is located outside the study area within the Batemans Bay Hospital property. AHIMS ID 58-4-1581 is a modified tree located on the upper slope above the study area (Figure 8). This site will not be impacted by the proposed works.

The majority of Aboriginal sites within the search parameters have artefact features (41%) and shell and artefact features (39.3%). The distribution of recorded Aboriginal sites within the vicinity of the study area is shown in Figure 8 and Figure 9. The frequencies of site types recorded within the AHIMS database search area are listed in Table 6 below:

Table 6: Frequencies of site types

Site Features	Number	%
Artefact	48	41
Artefact; Potential Archaeological Deposit (PAD)	1	0.85
Burial	3	2.6
Burial; Shell; Artefact	2	1.7
Modified Tree (Carved or Scarred)	3	2.6
Ochre Quarry	1	0.85
PAD	7	6
Shell	4	3.4
Shell; Artefact	46	39.3
Shell; Artefact; PAD	1	0.85
Shell; PAD	1	0.85
Total	117	100

LOCAL, STATE AND NATIONAL HERITAGE REGISTERS

Searches of the Australian Heritage Database, the State Heritage Register (SHR), and the Eurobodalla Local Environment Plan (LEP) 2012 were conducted on 16 April 2024 in order to determine if any places of archaeological significance are located within the study area.

No Aboriginal archaeological sites were recorded on these databases within the study area.

4.2.2 Archaeological investigations

Archaeological investigations along the South Coast have found that the most commonly occurring site types in the region are shell middens, artefact scatters and isolated finds, often identified in undisturbed locations in close proximity to the coastline, with only a small number of sites recorded in the wetlands and riverine plains behind the shoreline (ANU Archaeological Consultancies 1986; NSW Archaeology 2013; KNC 2017; Lantern 2023). A summary of some key reports undertaken within the region is provided below:

ANU ARCHAEOLOGICAL CONSULTANCIES, 1986. AN ARCHAEOLOGICAL INVESTIGATION OF THE NORTH BATEMANS BAY SEWERAGE SCHEME. A REPORT TO EUROBODALLA SHIRE COUNCIL.

ANU Archaeological Consultancies were engaged by the Eurobodalla Shire Council to undertake an archaeological investigation to inform the North Batemans Bay Sewerage Scheme. This assessment covered an area between Moloney's Flat and Batehaven and, at its closest point, was undertaken approximately 400m to the north of the current study area.

A review of previous archaeological investigations identified the most commonly occurring site types along the South Coast were shell middens, surface artefact scatters and isolated finds, with some

occurrences of burials, scarred trees and ceremonial sites. The review found stone artefact scatters were more likely to occur within the coastal hinterland, and shell middens were more likely to occur along the banks of creeks or near freshwater sources, rarely more than 1km inland.

The field survey identified five sites within the proximity to the study area, including four new sites and one previously recorded midden at Long Beach. The newly identified sites included:

- A shell midden, located at the eastern end of a major beach ridge at Moloney's Beach. The midden comprised shell, flakes, cores and retouched pieces of quartz (80%), rhyolite and quartzite.
- A stone artefact scatter, located on a hillslope overlooking Long Beach. The site comprised mostly quartz artefacts identified in an eroded, disturbed context.
- A stone artefact scatter, located along the eastern bank of Cullendulla Creek. The site comprised 6 artefacts of quartz, rhyolite and silcrete.
- A shell midden, located on a small, grassed remnant of the original beach at a picnic area beside Beach Road in Batemans Bay. The site was located in a disturbed context and contained rock platform shellfish, ash and charcoal.

The Long Beach Midden was considered to be the most scientifically significant site within proximity to the study area based on the relatively intact deposit, high density of quartz flakes, presence of backed blades and potential ability of the site to provide insight into Aboriginal technology and occupation from over 1000 years ago.

The assessment determined that the identified sites were located outside of the proposed impact area. Recommendations included no further archaeological survey or investigation was required, the pipeline should be constructed as close as possible to the existing pipeline to prevent any unwarranted impacts to the identified Aboriginal sites and the LALC be contacted to monitor works.

NAVIN OFFICER HERITAGE CONSULTANTS, 2000. *ABORIGINAL MIDDEN SITE CULLENDULLA CREEK 12 NORTH BATEMANS BAY NSW – SUBSURFACE TESTING PROGRAM LOT 1 DP875573. PREPARED FOR ALSTON PTY LTD AND NSW NPWS.*

Navin Officer Heritage Consultants were engaged by Alston Pty Ltd and NPWS to undertake a program of subsurface testing on Aboriginal midden site (Cullendulla Creek 12 – AHIMS ID 58-4-88/58-4-232), located in the Cullendulla Creek Nature Reserve. This assessment was undertaken approximately 4km to the north-east of the current study area.

The subsurface investigation found the majority of shell within the midden to be fragmentary and identified three animal bone fragments and five stone artefacts, comprising quartz and rhyolite flakes. Shell species were dominated by blue mussel, which accounted for 76% of the shell recovered from the *in situ* portions of the midden, rocky shoreline species accounted for 85% of the overall sample and 12% of the rocky shoreline species came from the estuarine flats.

The site was considered to be characteristic of a south-eastern Australian littoral midden in that the contents of the midden were reflective of the available shell species (rocky shoreline and mudflat species).

As a result of the investigation, the midden was assessed as presenting a moderate archaeological significance within the local context, as a large portion of *in situ* deposit remains at the site.

Recommendations included the areas containing *in situ*, undisturbed midden material should be conserved.

NEW SOUTH WALES ARCHAEOLOGY PTY LIMITED, 2006. *PROPOSED POWER ROUTE, SKID RIDGE ROAD MURRAMARANG NATIONAL PARK, DURRAS, NSW – ABORIGINAL ARCHAEOLOGICAL ASSESSMENT. PREPARED FOR NGH ENVIRONMENTAL.*

New South Wales Archaeology (NSW Archaeology) were engaged by NGH Environmental to undertake an Aboriginal Archaeological Assessment to inform the development of an approximately 550m underground powerline at Skid Ridge Road, Durras NSW. This assessment was undertaken approximately 11 km to the north-east of the current study area.

The desktop review did not identify any previously recorded Aboriginal sites within the study area and indicated stone artefact scatters and isolated finds were likely to occur in undisturbed contexts and in areas of surface visibility.

The field survey found the entirety of the study area had previously been modified by land clearance, the installation of a power line, road construction and associated grading. One (1) Aboriginal site, a low-density artefact scatter, was identified in a disturbed context within the study area. This site was considered to be of low archaeological significance, and the overall study area was assessed to be of low archaeological potential due to the high levels of observed disturbance. As a result, no further archaeological investigation was recommended, though an AHIP would need to be sought prior to any construction works to mitigate impacts to the identified Aboriginal site.

NEW SOUTH WALES ARCHAEOLOGY, 2013. *WHARF ROAD SHARED PATHWAY – ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT. PREPARED FOR EUROBODALLA SHIRE COUNCIL.*

NSW Archaeology were engaged by the Eurobodalla Shire Council to undertake an Aboriginal Cultural Heritage Assessment (ACHA) to inform the development of a shared pathway adjacent to Wharf Road in Batemans Bay, NSW. This assessment was undertaken approximately 1.2km to the north of the current study area.

A desktop review, including a search of the AHIMS database, identified shell middens, artefact scatters, isolated finds and culturally modified trees were the most commonly occurring Aboriginal sites within the vicinity of the study area. Three (3) Aboriginal sites had previously been recorded within or in close proximity to the study area.

A review of archaeological investigations undertaken within the region indicated artefact scatters and isolated finds largely consisted of flakes, flaked pieces and debitage (80%), with the dominant raw materials comprising silcrete, volcanic, quartz, chert and quartzite. Tool types included hammers and anvils (14%) as well as backed blades and scrapers (5%). These studies have also found that sites are often identified on ridge lines and spurs, on level ground and in proximity to permanent water sources, indicating that proximity to water sources often correlates to long-term occupational patterns.

A field survey of the pathway was undertaken in two survey units. Survey Unit 1 (SU1) comprised the sand landform and was noted to be highly disturbed with low ground surface visibility. No surface artefacts or areas of potential were identified in SU1, and the area was considered to have an overall low archaeological potential. Survey Unit 2 (SU2) comprised the bedrock headland at the eastern end of the study area. AHIMS ID 58-4-512 was relocated in SU2, and midden material was identified on the

southern side of Wharf Road. SU2 was considered to be highly eroded and disturbed with low surface visibility, and the remaining shell was mostly sparse and fragmented. No stone artefacts were identified on the headland in SU2, though some could be seen eroding from the upper parts of the road cutting.

As a result of the assessment, it was determined that a shell midden site was located within the proposed impact area and as such, an AHIP would be required to construct the shared pathway in the eastern portion of the study area.

KELLEHER NIGHTINGALE CONSULTING PTY LTD, 2017. BATEMANS BAY BRIDGE REPLACEMENT – ABORIGINAL CULTURAL HERITAGE ASSESSMENT. PREPARED FOR AURECON ON BEHALF OF NSW ROADS AND MARITIME SERVICES.

Kelleher Nightingale Consulting (KNC) were engaged by Aurecon, on behalf of NSW Roads and Maritime Services, to undertake an ACHA to inform the Batemans Bay Bridge Replacement Project. This assessment was undertaken approximately 1.3 km to the north-west of the current study area.

A desktop review of previous investigations undertaken within the region found commonly occurring sites included shell middens, surface artefact scatters and isolated artefacts, on relatively elevated landforms and along the margins of the Clyde River and its tributaries.

Within the study area, four Aboriginal sites had previously been recorded, including three shell middens and one artefact scatter, identified during an assessment conducted in 2008. All four sites had been subject to test excavations, which recovered subsurface archaeological deposits. The previously recorded sites included:

- AHIMS ID 58-4-1273, a surface artefact scatter located on a gentle northern slope north-east of the Clyde River. The test excavation recovered four quartz flakes and one silcrete flake.
- AHIMS ID 58-4-1288, a shell midden deposit located on a southern slope north-east of the Clyde River. The test excavation recovered 1,061 pieces of shell, five silcrete flakes and four quartz flakes, extending to a depth of 16cm.
- AHIMS ID 58-4-1289, a shell midden deposit located on the crest north-east of the Clyde River. The test excavation recovered 220 pieces of shell, a blade, 8 silcrete flakes, 12 quartz flakes and 2 flakes made of igneous material.
- AHIMS ID 58-4-1287, a shell midden deposit located on the crest north-east of the Clyde River. The test excavation recovered 70 pieces of shell, 5 quartz flakes, one scraper and four silcrete flakes to a depth of 21cm.

The field survey undertaken by KNC identified one new PAD (Korners Park PAD 1) within the study area, located on a raised flat, adjacent to the north-eastern bank of the Clyde River. The previously recorded sites within the study area exhibited varying levels of disturbance and the majority of the study area was considered to have no archaeological potential due to disturbance related to past land use practices, the construction of roads and urban structures and natural erosional processes. Following the survey, a program of test excavation was recommended within the newly identified PAD.

A program of test excavation was undertaken, with a total of fifteen test pits excavated across the PAD (Korners Park PAD 1). The excavation identified two artefacts within the layer of disturbed fill, overlaying a deposit of homogenous, medium grained sand. The site was re-labelled as Korner's Park AFT1 (AHIMS ID Pending).

Two of the five sites within the study area (AHIMS ID 58-4-1288 and AHIMS ID 58-4-1289) were considered to be of moderate archaeological significance due to their high-density of recovered material and low levels of disturbance. The remaining sites (AHIMS ID 58-4-1273 AIMS ID 58-4-1287 and Kroner AFT 1) were considered to have a low archaeological significance due to their high levels of disturbance.

The assessment determined that all five sites would be impacted by the proposed works and as such an AHIP would need to be sought. Recommendations included salvage excavations be undertaken for the two sites assessed as presenting a moderate archaeological significance, and no further archaeological investigations would be required for the sites presenting a low archaeological significance.

KELLEHER NIGHTINGALE CONSULTING PTY LTD, 2020. SOUTH BATEMANS BAY LINK ROAD – ABORIGINAL CULTURAL HERITAGE ASSESSMENT. PREPARED FOR TRANSPORT FOR NEW SOUTH WALES.

KNC were engaged by Transport for NSW (TfNSW) to undertake an ACHA to inform the road reconstruction works and upgrades to the Princess Highway and Glenella Road, located approximately 1.5km to the south of the current study area.

The desktop review, including a search of the AHIMS database, identified three AHIMS sites within the study area, though all three sites were open artefact sites that had been destroyed by road works under an AHIP. The predictive model indicated that the ridgelines and crests across the study area may have functioned as pathways between the coast and inland regions.

The field survey identified one low-density artefact site (South Batemans Bay Link Road AFT1) and one PAD (South Batemans Bay Link Road PAD 1) within the study area, located on the ridgeline descending south towards the Clyde River. Ground surface visibility was generally low, and exposures were observed in areas of natural erosional processes, where vegetation had been removed and where construction works had occurred. The survey determined that the majority of the study area had no potential for subsurface archaeological deposits due to the observed levels of ground surface disturbance related to natural erosional processes, the construction of nearby roads and past forestry and logging activities.

A program of test excavation was undertaken across the two identified sites within the study area, with fourteen test pits excavated in South Batemans Bay Link Road AFT 1 and ten at South Batemans Bay Link Road PAD 1. A total of 10 artefacts were recovered from PAD 1, comprising quartz flaking debitage (flakes, one backed complete flake and angular fragments) and soils were generally shallow (to a depth of 25cm). Three (3) subsurface artefacts were recovered from AFT 1, including one quartz unifacial quartz core, one rhyolite flake and an isolated quartz complete flake, and the depth of the test pits ranged from 10-30cm.

The excavation found that soils were generally light brown sandy clay loams to orange-brown silty clay loams and determined that the study area had recently been subject to a bushfire resulting in little to no humic layer. The findings were considered consistent with previous findings, in that the study area was likely used as a travel corridor and access route and the local coastal hinterland was likely utilised periodically for hunting and gathering.

As a result of the test excavation, the two sites were considered to present a low scientific archaeological significance, and no further archaeological investigation was recommended, though an AHIP would need to be obtained before any works in the study area.

LANTERN HERITAGE, 2023. 2A MYAMBA PARADE, SURFSIDE – ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT. REPORT TO ACORN PROJECT ADVISORY.

Lantern Heritage were engaged by Acorn Project Advisory to undertake an ACHA to inform the proposed eco tourist development and coastal remediation works at 2A Myamba Parade, Surfside NSW. This assessment was undertaken approximately 4km to the north-east of the current study area.

One previously recorded AHIMS site, AHIMS ID 58-4-1338 (Myamba Parade Midden) was recorded within the western portion of the study area. This site had previously been subject to an AHIP (#3076) and subsurface investigations (Navin Officer Heritage Consultants 2000) which recorded an undisturbed, intact midden deposit below a 10-20cm layer of disturbance.

The desktop review indicated commonly occurring site types within the vicinity of the study area included artefact scatters and isolated finds (49.5%), shell middens (33.9%) and areas of PAD (4.6%) and found coastal middens are frequently located on or near rocky headlands or rock platforms and in proximity to creeks or permanent water sources. Artefact scatters were noted to occur across all landforms, with increased sensitivity on lower gradient landforms and where minimal ground surface disturbance has occurred.

The field survey identified the majority of the study area was covered in a dispersed layer of midden material associated with AHIMS ID 58-4-1338. The highest density of midden material was observed in the western half of the study area, adjacent to the intact portion of the midden, and it was considered there was high potential for subsurface Aboriginal objects to be located within the landform due to the proximity of the previously recorded site, presence of surface shell material and depth of the deposit observed in undisturbed areas. The study area was also considered to have high cultural significance as a place for swimming and gathering shellfish resources.

As a result of the assessment, it was determined that the proposed works would result in direct harm to AHIMS ID 58-4-1338 and as such an AHIP would be required prior to works.



Figure 8: Registered AHIMS sites within proximity to the study area

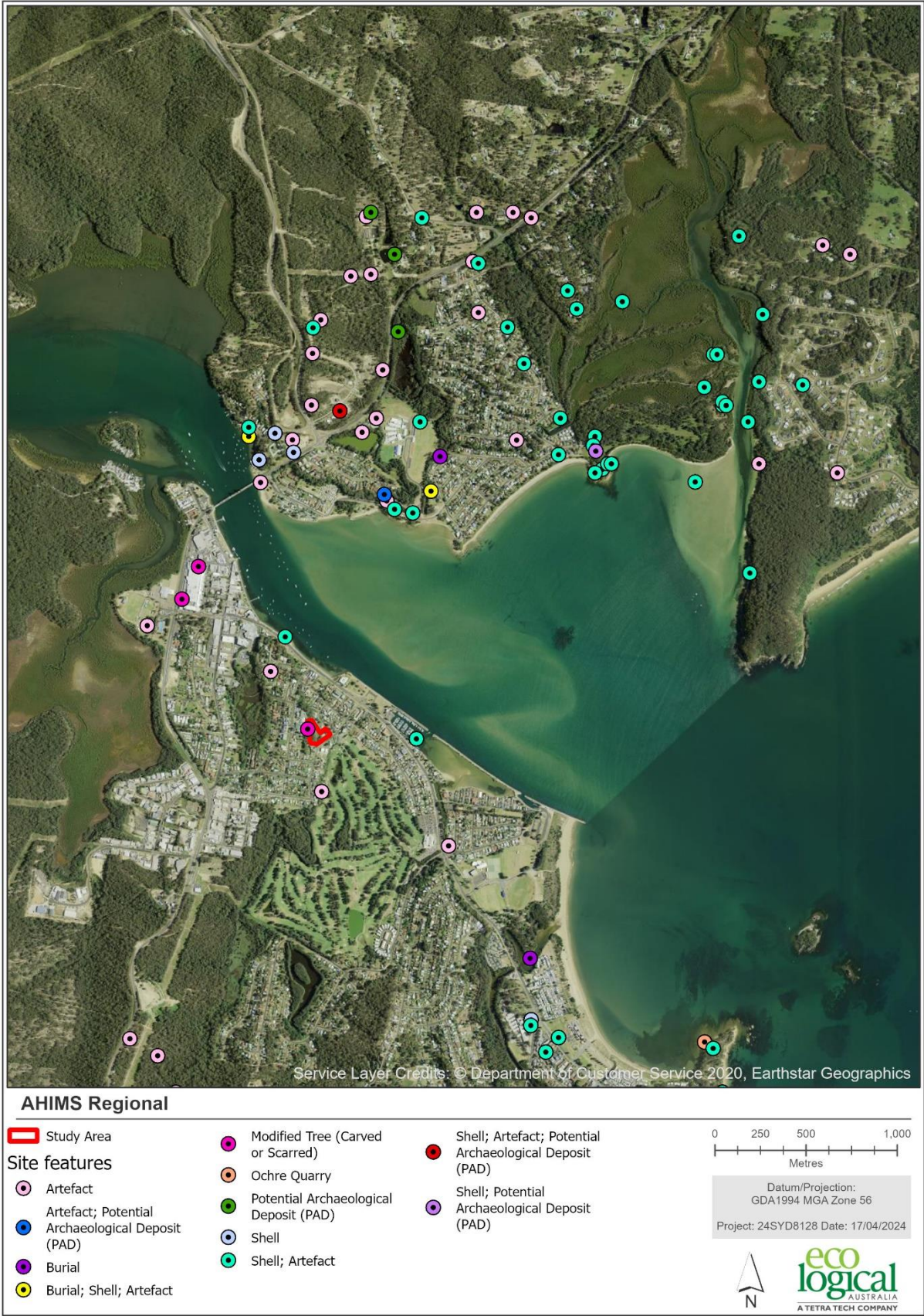


Figure 9: Regional overview of AHIMS sites surrounding the study area

5. Regional character and predictive model

5.1 Regional character

Previous archaeological assessments across the region provide important data on Aboriginal archaeological site distribution and typology from which an understanding of the archaeological landscape within the study area can be developed.

Lampert's (1971) excavation of the Burrill Lake, South Coast, rock shelter, located to the north of the study area, has provided some of the earliest evidence for the occupation of south-eastern coastal New South Wales. Radiocarbon dates derived from wood charcoal present in the lowest occupation layers of the rock shelter yielded dates of $20,820 \pm 810$ and $20,760 \pm 800$ years BP (Lampert 1971:9). The faunal remains from the site indicate that the local population were subsisting on a mixed coastal-bushland diet: whilst marine shell was present, there was a heavy emphasis on the faunal species available in the immediate vicinity of the shelter (Lampert 1971:12).

A review of archaeological investigations undertaken along the South Coast and within the vicinity of the study area have found that the most commonly occurring site types in the region are shell middens, artefact scatters and isolated finds, often identified in undisturbed locations and in close proximity to the coastline (ANU Archaeological Consultancies 1986; NSW Archaeology 2013; KNC 2017; Lantern 2023).

Coastal middens are frequently located on or near rocky headlands or rock platforms and in proximity to permanent water sources, creeks and along the banks of the Clyde River and its tributaries. Artefact scatters occur across all landforms and are more likely in areas where surface visibility is high. These sites are often located on ridge lines and spurs, with increased sensitivity on lower gradient landforms and where minimal ground surface disturbance has occurred. Within the region, proximity to permanent water sources often correlates to long-term occupational patterns (NSW Archaeology 2006 & 2013; KNC 2017; Lantern Heritage 2023).

Artefact scatters and isolated finds within the region largely consist of flakes, flaked pieces and debitage (80%), with the dominant raw material comprising silcrete, volcanic, quartz, chert, rhyolite and quartzite. Tool types include hammers and anvils (14%) as well as backed blades and scrapers (5%) (NSW Archaeology 2013).

Shell midden sites comprise varying densities of shells, artefacts and bone, and subsurface investigations of middens have revealed large quantities of fragmented shell. Shell species are reflective of resource availability and tend to be dominated by blue mussel and rocky shoreline and mudflat species (Navin Officer Heritage Consultants 2000). These investigations have uncovered generally low densities of artefacts and high densities of shell (KNC 2017; 2020), indicating the region was likely used as a travel corridor and the coastal hinterland was utilised periodically for hunting and gathering (KNC 2020).

Higher density sites are more likely to occur in undisturbed contexts, and *in situ* deposits are more likely to present a higher archaeological significance. Intact subsurface archaeological deposits are less likely to occur where the landform has been modified (NSW Archaeology 2006; Navin Officer Heritage Consultants 2000; Lantern Heritage 2023), though it should be noted that artefacts have been uncovered in disturbed layers of fill (KNC 2020).

5.2 Predictive models

Predictive models are a commonly utilised tool in the planning and management of Aboriginal cultural heritage. These models aim to identify specific landforms and places within the landscape which may contain archaeological material. They usually begin as geographically broad models, constructed through extensive reviews of the available literature to determine basic patterns of site distribution, before being refined according to specific landforms and the environmental characteristics of a study area.

Predictive models are primarily based upon a cultural ecological perspective of the landscape. This is because landforms and environmental characteristics provided a distinct set of subsistence constraints which meant the landscape could only be occupied in particular ways in order to minimise distance to portable water, maximise biodiversity, and provide shelter from the elements. As such, land use patterns are expected to vary between environmental zones due to differing constraints, a difference that manifests in varying spatial distributions of archaeological material. Social factors may have also influenced communities to venture through or avoid certain landscapes, regardless of environmental conditions, which is why we must consult with local Aboriginal knowledge holders and community members to understand to understand the cultural context of certain landscapes.

5.2.1 Site types

There are several common Aboriginal cultural heritage site types that may be found in the study area.

Open camp sites / stone artefact scatters represent past Aboriginal subsistence and stone knapping activities and may include archaeological remains such as stone artefacts and hearths. This site type usually appears as surface artefact scatters in areas where vegetation is limited, and ground surface visibility is high. They are also often exposed by erosion, agricultural events (such as ploughing), and the creation of informal, unsealed vehicle access tracks and walking paths. Open campsites are often located on dry, relatively flat land along or adjacent to rivers and creeks. Sites that contain surface or subsurface deposits resulting from repeated or continuous occupation are more likely to occur on elevated ground near permanent, reliable water sources. Flat, open areas associated with creeks and their resource-rich environments would have offered ideal camping areas to the Aboriginal inhabitants of the local area.

Isolated artefacts may represent a single item discard event or the result of limited stone knapping activity. The identification of isolated artefacts may indicate the presence of a more extensive, subsurface *in situ* archaeological deposit, or a larger deposit obscured by low ground visibility. Isolated artefacts are likely to be located on landforms associated with a range of activities, such as ridge lines that would have provided ease of movement through the area and level areas with access to a water source. Artefact scatters and isolated artefacts are the most common site types found in association with fresh water and/or food resource gathering areas.

Potential Archaeological Deposit (PAD) are areas where there is no surface expression of stone artefacts, but, due to a landscape feature or isolated artefact, there is a strong likelihood that the area will contain subsurface *in situ* archaeological deposits. Landscape features that may indicate a PAD include proximity to reliable water sources, particularly terraces and flats, ridge lines and ridge tops, and sand dune systems.

Culturally modified trees exhibit evidence of the deliberate removal of the *periderm* (outer bark), *phloem* (inner bark), and, in some cases, the sapwood. These materials can be used to manufacture a variety of items, including shields, Coolamon (bowls or trays), watercraft, containers, and a range of wooden tools and implements. Trees may also have been scarred in order to gain access to food resources (such as cutting toeholds so as to climb the tree and catch possums or birds) or to mark locations (such as tribal territories). In some instances, Aboriginal people marked important features or locations (such as ceremonial grounds) by carving patterns or motifs into the sapwood of established trees or bending and grafting the branches of saplings to create rings.

Grinding grooves are the physical evidence of tool making or food processing activities undertaken by Aboriginal people. The manual rubbing of stones against other stones creates grooves in the rock; these are usually found on flat areas of abrasive rock such as sandstone in close proximity to water courses.

Bora grounds / ceremonial sites are locations that have spiritual or ceremonial values to Aboriginal people. Such sites may comprise natural or altered landforms and, in some cases, will also contain archaeological material. For example, bora grounds are a ceremonial site type usually consisting of a cleared area around one or more raised earth circles connected by a pathway. Bora grounds are often accompanied by ground drawings or mouldings of people, animals or deities, or geometrically carved designs on the surrounding trees.

Burials often took place in proximity to camp sites, as most people tended to die in or close to camp and it is difficult to move a body over a long distance. Soft, sandy soils on or close to rivers and creeks allowed for easier removal of earth for burial. Similarly, rock shelters or middens also provided accessible burial places. Burial sites may be marked by stone cairns, modified trees, or a natural landmark. They may also be identified through historic records or oral histories.

Contact / historical sites can include a wide variety of sites and may be identified through artefactual evidence or oral histories. Artefacts located at such sites may involve the use of introduced materials such as glass or ceramics or may have social significance regarding the interaction between Aboriginal people and European settlers.

5.2.2 Site occurrence

Based on the results from the landscape assessment, searches of the AHIMS database and examination of the regional and local Aboriginal archaeological context, the below predictive model (Table 7) has been designed for the study area.

Table 7: Predictive model for the occurrence of archaeological site types in the study area

Site Type	Description	Likelihood of occurrence
Open camp sites / stone artefact scatters / isolated finds	Artefact scatters and isolated artefacts are the most common site types found in association with fresh water, and/or food resource gathering areas. Artefact scatters and isolated finds are reported to be the most common archaeological site type in the vicinity of the study area, occurring within close proximity to water sources and in undisturbed contexts. Artefact scatters and isolated finds are more likely to be located in undisturbed landforms where the ground surface is visible, indicating this could occur in areas of visibility within the study area.	High

Site Type	Description	Likelihood of occurrence
Potential Archaeological Deposits	The study area has undergone minimal ground disturbance, and areas of archaeological potential are likely to occur on low lying landforms in proximity to the coastline and in areas that have not been disturbed.	Moderate
Culturally modified trees	<p>Culturally modified trees may be present wherever tree specimens of an appropriate age are present.</p> <p>One culturally modified tree has been recorded to the west of the study area; however, the study area has largely been cleared of native vegetation indicating this is unlikely to occur.</p>	Low
Grinding grooves	There are no recorded grinding grooves within proximity to the study area, and the underlying geomorphology of the study area is not conducive to this site type indicating this is unlikely to occur.	Low
Bora grounds / ceremonial sites	There are no reported bora/ceremonial sites within the vicinity of the study area.	Low
Burials	There are no recorded burial sites in proximity to the study area. The study area is not located within a sand dune system, midden or within 200m of a major water source, indicating this is unlikely to occur.	Low
Contact / historical sites	Contact sites may occur in any area where Aboriginal people encountered early European settlers, however there is no evidence to suggest this will occur within the study area.	Low

6. Archaeological survey

6.1 Purpose

The purpose of the survey was to assess the current condition of the site and to identify any unrecorded Aboriginal sites or objects. Areas of subsurface archaeological potential identified in the desktop assessment were also inspected and potential areas for archaeological testing were considered.

6.2 Survey strategy

Archaeological survey of the study area was conducted on foot, in accordance with the *Code of Practice*. The overall strategy was to complete a sample survey, targeting areas of exposure and archaeological sensitivity. A handheld Global Positioning System (GPS) was used to track the survey area covered and record the location of key features such as disturbances and areas of archaeological sensitivity/potential. The coordinate system projection used for all site recording was GDA94 MGA 56.

The field survey methodology was as follows:

- Record the landform, general soil information, surface conditions and vegetation conditions encountered during the survey and how these impact on the visibility of objects.
- Define the boundaries of any Aboriginal sites and areas of PAD based on landmarks and historical maps.
- Reinspect previously identified Aboriginal sites and areas of archaeological potential within the study area.
- Identify areas of disturbance which may have impacted the presence of intact soils and archaeological features.
- Consultation with Aboriginal representatives to discuss the potential intangible cultural heritage values of the study area.
- Collect information to ascertain whether further archaeological investigation is required.

All ground exposures were examined for Aboriginal objects, such as stone artefacts, or other traces of Aboriginal occupation and old growth trees, were examined for signs of cultural manipulation, manufacture, scarring and/or marking.

A photographic record was kept during the survey. Photographs were taken to record aspects of survey units including vegetation and disturbance. Scales were used for photographs where appropriate.

6.2.1 Site definition and recording

An Aboriginal site is generally defined as an Aboriginal object or place. An Aboriginal object is the material evidence of Aboriginal land use, such as stone tools, scarred trees, or rock art. Some sites, or Aboriginal places can also be intangible and although they might not be visible, these places have cultural significance to Aboriginal people.

The Heritage NSW guidelines state, in regard to site definition, that one or more of the following criteria must be used when recording material traces of Aboriginal land use:

- The spatial extent of the visible objects, or direct evidence of their location.

- Obvious physical boundaries where present, e.g., mound site and middens (if visibility is good), a ceremonial ground.
- Identification by the Aboriginal community on the basis of cultural information.

For the purposes of this study, an Aboriginal site was defined by recording the spatial extent of visible traces or the direct evidence of their location.

6.2.2 Protocol for recording Potential Archaeological Deposits

Where areas of PAD are identified towards the margins of each survey unit, efforts must be made by the survey team to delineate each area of potential beyond the survey unit. Where the extent of the PAD extends beyond the survey unit, efforts must be made to map the extent of that feature up to approximately 50m outside the survey unit. If it is likely that these PADs continue beyond that point, the survey team must justify that the distance is adequate to provide an accurate representation of the PAD with regard to future planning and design for the project.

6.3 Survey Results

An archaeological survey was undertaken by ELA Archaeologists Charlotte Bradshaw and Kate Storan and Bill Davis, an Elder from the Batemans Bay Local Aboriginal Land Council (LALC) on 19 April 2024.

KEY FINDINGS

The eastern portion of the study area comprises a terraced flat landform (Figure 10 – Figure 17) which has undergone minor observable ground disturbance. The south-eastern portion of the study area has been highly modified in relation related the construction of the two residential dwellings, gravel driveway, vegetation clearance and installation of fences (Figure 10 – Figure 13), as well as by the installation of below-ground services and the construction of Bavarde Avenue along the southern boundary of the study area (Figure 17). The remainder of the study area does not appear to have been observably disturbed (Figure 14 – Figure 16).

Exposures within the study area were overall low due to dense grass cover, and areas of exposure revealed mixed deposits of orange-brown sandy loam, gravel and rock. Native vegetation within the study area has largely been cleared, with remnant, regrowth and old-growth trees scattered along the steep slope along the western boundary of the study area. No cultural markings were observed on any trees within the study area.

No Aboriginal objects were identified within the study area due to low levels of surface visibility, however the northern portion of the study area is considered to have subsurface archaeological potential due to the relatively flat landform, lack of observable ground disturbance and cultural contributions from Aboriginal Elder Bill Davis during the survey.

During the survey, Aboriginal Elder Bill Davis noted that the ridgeline along the western boundary of the study area was likely utilised as a traditional walkway, and that Aboriginal groups would have camped and brought resources like oysters and shellfish from the coast to the area, even throughout the contact period. Aboriginal Elder Bill Davis also mentioned that the deposit was likely to be deep and the area was more likely to be representative of a short-term occupation site due to its location being too cold to camp in the winter months.



Figure 10: View west from south-eastern corner of study area, showing single storey residence and modified gravel driveway



Figure 11: View south towards Bavarde Avenue from south-eastern corner of study area, showing single storey residence, fencing and dense grass in backyard



Figure 12: View north-west showing gravel driveway, remnant trees and mixed deposits of orange-brown sandy loams, gravel and rock



Figure 13: View west showing disturbance in south-eastern corner of study area



Figure 14: View north showing dense grass cover in northern portion of study area and remnant trees along steep slope along western boundary



Figure 15: View west showing dense grass cover and remnant trees along steep slope along western boundary of study area



Figure 16: View north showing relatively undisturbed landform and dense grass covering northern portion of study area



Figure 17: View south towards Bavarde Avenue showing modified landform

6.3.1 Survey coverage

In accordance with Heritage NSW *Code of Practice* the study area was surveyed in relation to survey units, landforms, and landscapes.

Table 8: Survey coverage

Landform Unit	Landform	Survey Unit Area (m ²)	Visibility (%)	Exposure (%)	Effective coverage (ECA)	Effective coverage (%)
1	Flat	5,822	5	2	5.822	0.1
2	Slope	2,577	30	30	231.93	9

Table 9: Landform summary

Landform	Landform Area (m ²)	Area effectively surveyed (m ²)	% of landform effectively surveyed	Number of sites	Number of features
Flat	5,822	5.822	0.1	0	1
Slope	2,577	231.93	9	0	0



Figure 18: Survey coverage and tracks for the study area



Figure 19: Areas of potential identified during the survey for the study area and proposed test pit locations

7. Archaeological Test Excavations

7.1 Introduction

The purpose of the Archaeological Research Design (ARD) is two-fold: to provide and direct a reasonable foundation for management decisions for the archaeological resource as well as satisfying regulatory requirements through a standardised process. The research design will be founded on: “what questions one is interested in investigating, what kinds of sites one expects to find, and the information needed to be collected” (Burke & Smith 2004:3). All related future archaeological studies and analyses stand to benefit if guided by clear linkage of study goals, relevant theory, methods and data collection. The application of a research design is international best practice and plays a vital role in the planning and management of cultural heritage.

The aim of this research design is to assist in furthering our understanding of how Aboriginal people utilised the study area in the past. The archaeological investigation was to conduct an archaeological survey of the areas of proposed development to evaluate areas of archaeological potential within the areas of proposed development.

As noted above, numerous archaeological assessments have been conducted within the region. These archaeological assessments have identified that the current study area and surrounds have the potential for archaeological resources.

7.2 Research Design

The test excavation investigated the study area for evidence of occupation and site utilisation. The research questions outlined below include broad questions that attempted to show the level of information the site might be expected to reveal as well as questions specifically related to the study area:

- What types of raw materials, artefact types and tool types are present within the assemblage?
- What types of stone tool technology are present within the site?
- Have the test excavations revealed other site types such as hearths, heating ovens, knapping floors or other foci or activity areas?
- Do the results of the test excavation demonstrate any evidence of disturbance within the study area?
- How do the test excavation results compare with others in the region?
- How does the pattern of landscape use compare to previous studies in the region?
- What can the artefact assemblage (or lack thereof) indicate about previous land use by Aboriginal people?

The research design questions developed to guide the testing program are not limited to the questions above and other pertinent questions may arise (or be fine-tuned) during the course of the work being undertaken.

7.3 Test Excavation Methodology

ELA undertook archaeological test excavations in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010a). The purpose of the

archaeological test excavation was to collect information about the nature and extent of sub-surface Aboriginal objects, based on a sample gathered from sub-surface investigations, in order to understand how best to manage it. The work was undertaken by a team comprising archaeologists and representatives from the Aboriginal community. The test excavation methodology applied to the study area is outlined below.

- The test pits were excavated by hand (inclusive of trowels, spades and other hand tools) in a grid at intervals of 10 metres or other justifiable and regular spacing appropriate to the scale of the area being tested.
- The first test pit within a landform or PAD area was excavated in 5 cm spits; the subsequent test pits conducted within the landform or PAD area were then excavated in either 10 cm spits or stratigraphic units (whichever is smaller) to the base of Aboriginal object-bearing units, being the removal of the A-horizon soil deposit down to the sterile clay layer (B-horizon).
- Depending on the depth required to reach the sterile clay layer, additional adjacent 50 cm x 50 cm test pits may be excavated (for example expanding the test pit to 50 cm x 1 m) to reach the sterile clay layer.

GENERAL PROCEDURES FROM THE CODE OF PRACTICE

- The Code of Practice dictates that the maximum surface area of all test excavation units must be no greater than 0.5% of the PAD or area being investigated.
- All excavated soil was sieved in 5 mm sieves. Artefacts were to be collected and bagged according to test pit location and spit or context number.
- Dry sieving was employed due to the sandy nature of the soils.
- Each test pit was recorded using standardised recording forms, coordinates collected using a GPS and photographed using a scale and range pole.
- The stratigraphic / soil profile for each test pit was recorded in scale drawings as required by Heritage NSW Code of Archaeological Practice recording requirements.
- Test pits were backfilled as soon as practicable.
- An AHIMS site card would be prepared and submitted to the AHIMS Registrar for any new sites identified during test excavations.
- An AHIMS Site Impact Recording form would be completed and submitted to the AHIMS Registrar for any sites impacted during test excavations.
- A procedure was in place in the unlikely event that suspected human remains were identified during works.
- Test excavations ceased when enough information* was recovered to adequately characterise the objects present with regard to their nature and significance.

*Enough information is defined by Heritage NSW as meaning “that the sample of excavated material clearly and self-evidently demonstrates the deposit’s nature and significance. This may include things like locally or regionally high object density: presence of rare or representative objects: presence of archaeological features: or locally or regionally significant deposits stratified or not” (DECCW 2010a).

7.4 Test excavation results

Archaeological excavations within the study area resulted in no Aboriginal objects being identified across twelve (12) test pits. There were signs of recent disturbance within the northern portion of the study area, associated with the installation of survey pegs, vehicular movements and a submerged pit in the north-eastern corner that was not observed during the initial archaeological survey (Figure 24).

Cultural contributions during the test excavation also indicated that whilst the study area was likely to have been used as a short term campsite, it had previously been ploughed and utilised as a horse paddock (c. 1930s), and several test pits displayed some degree of disturbance from historic land use. The remainder of the test pits contained relatively intact soil profiles. The following section presents a summary of the test excavation results.



Figure 20: View north showing surface disturbance from activities undertaken between survey and test excavations.

SOILS AND STRATIGRAPHY

The excavation area is located on a terraced flat landform that has been cleared of vegetation and is currently vegetated with long grass, with remnant old growth trees lining the property to the west.

Soils across the transect generally consisted of moderately deep (<800mm), organic dark brown sandy loams (A Horizon), over a friable yellow/brown to yellow/orange loamy sand (B Horizon) with some orange mottling. The soil profile then transitions to a yellow/orange marine beach sand layer (C Horizon). Excavations cease at this level as the pits became saturated and filled with ground water (water table). The saturated C Horizon is likely reflective of high tide level and indicates the study area

may have been a former beach or the swale behind a dune system. The study area may have been a former intertidal zone.

The boundaries between the A and B Horizon were clear and there were very minor root inclusions across all test pits, and no rocky inclusions aside from one rounded pebble in Test Pit 1. All test pits comprised small, natural marine shell inclusions between 300-800mm as soils transitioned to the compact marine beach sand layer.

Test Pits 3, 7, 9, 10 and 12 displayed signs of disturbance related to historic land use. These test pits comprised a layer of historic fill (to a maximum depth of 400mm) which contained glass, brick, plastic, mixed clay, nails and straws overlaid on the dark brown topsoil. There was evidence of burnt clay/brick in Test Pit 7, however, this was attributed to use as a historic garbage disposal rather than evidence of Aboriginal occupation.

The remainder of the test pits retained relatively intact soil profiles and became increasingly shallow towards the northern boundary (<500mm). Larger shell inclusions in Test Pits 2, 4, 8 between 300-600mm comprised cockle, mussel and one turbo shell identified in Test Pit 4. The shell was not found to be reflective of an Aboriginal shell midden as there was not a distinct or clear boundary. The largest shell inclusion across the transect was in Test Pit 12 which comprised a historic deposit mixed with a layer of fill above the beach sand layer and included shale, sandstone, glass, plastic, metal fragments and brick.

Representative sections and a summary of the soil profiles of test pits are presented and described below.

Table 10: Soil summary for test pits 1,2,4-6,8

Stratigraphy		Description
A Horizon	Depth	0 – 300mm
	pH	8
	Munsell	2.5Y 4/1
		Organic and friable dark brown sandy loam, slightly moist. Minor grass and root inclusions. Intact topsoil. No rock inclusions.
B Horizon	Depth	200mm-700mm
	pH	8.5
	Munsell	2.5Y 7/4 - 7/5
		Friable yellow/brown to yellow/orange sandy loam, minor root inclusions. Small marine shell inclusions, part of natural marine shell bed. Some orange mottling. Clear boundary and transition to saturated, marine beach sand. Sparse shell inclusions in Test Pits 2, 4, 8 between comprised, mussel, and one turbo shell identified in Test Pit 4.
C horizon	Depth	C Horizon
	pH	8.5
	Munsell	2.5Y 7/4
		Small marine shell inclusions, part of natural marine shell bed. Yellow/orange marine beach sand layer (C Horizon). Excavations cease at this level as the pits became saturated and filled with ground water (water table).



Figure 21: Plan view of Test Pit 1 showing damp water table at base of pit



Figure 22: Location of Test Pit 1, looking north-west



Figure 23: Profile view of Test Pit 2 showing clear boundaries between topsoil (A Horizon) and marine beach sand layer (B Horizon)



Figure 24: Plan view of Test Pit 2



Figure 25: Plan view of Test Pit 5



Figure 26: Location of Test Pit 5, view south-west

Table 11: Soil summary for test pits 3, 7, 9, 10 and 12

Stratigraphy	Description	
Historic Fill	Depth	Historic Fill
	Test pits 3, 7, 9, 10 and 12 comprised a layer of historic fill (to a maximum depth of 400mm) which contained glass, brick, plastic, mixed clay, nails and straws overlaid on the dark brown topsoil. There was evidence of burnt clay/brick in Test Pit 7. Test Pit 12 comprised topsoil mixed with historic fill and shell on top of marine beach sand.	
A Horizon	Depth	0 – 300mm
	pH	8
	Munsell	2.5Y 4/1
	Organic and friable dark brown sandy loam, slightly moist. Minor grass and root inclusions. Intact topsoil. No rock inclusions.	
B Horizon	Depth	200mm-700mm
	pH	8.5
	Munsell	2.5Y 7/4 - 7/5
	Friable yellow/brown to yellow/orange sandy loam, minor root inclusions. Small marine shell inclusions, part of natural marine shell bed. Some orange mottling. Clear boundary and transition to saturated, marine beach sand. Sparse shell inclusions in Test Pits 2, 4, 8 between comprised, mussel, and one turbo shell identified in Test Pit 4.	
C horizon	Depth	C Horizon
	pH	8.5
	Munsell	2.5Y 7/4
	Small marine shell inclusions, part of natural marine shell bed. Yellow/orange marine beach sand layer (C Horizon). Excavations cease at this level as the pits became saturated and filled with ground water (water table).	



Figure 27: Profile view of Test Pit 3 showing layer of historic fill above natural soils



Figure 28: Location of Test Pit 3 along fence line, view south-east



Figure 29: Profile view of Test Pit 5



Figure 30: Profile view of Test Pit 7



Figure 31: Location of Test Pit 7, view north-west



Figure 32: Plan view of Test Pit 10



Figure 33: Profile view of Test Pit 10 showing shallow soils and clear transition to marine beach sand layer



Figure 34: Location of Test Pit 10, view west



Figure 35: Plan view of Test Pit 12



Figure 36: Profile view of Test Pit 12 showing layer of historic fill in topsoil

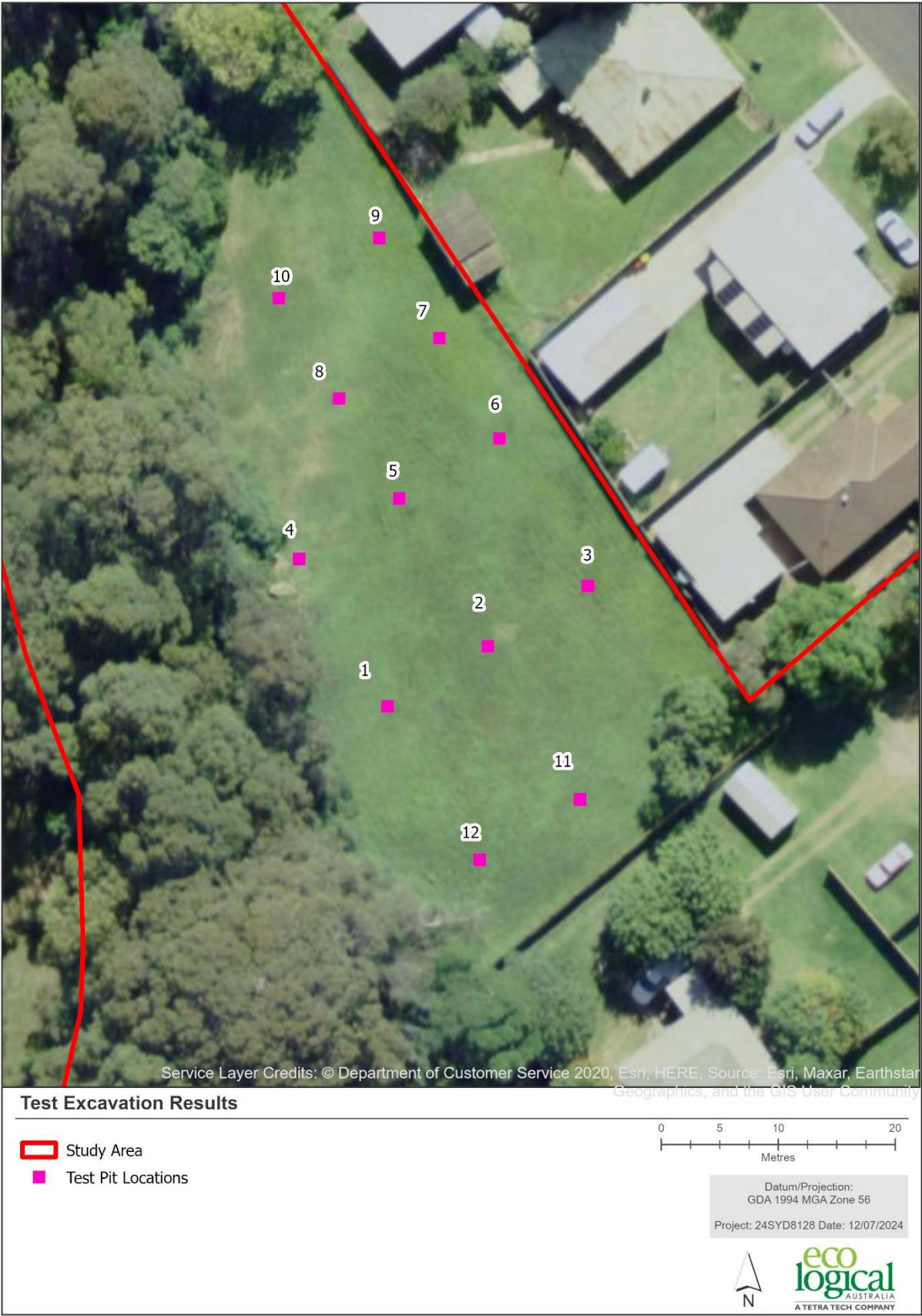


Figure 37: Location of test pits excavated; no Aboriginal objects identified

8. Analysis and discussion

WHAT IS THE DISTRIBUTION OF EVIDENCE OF PAST ABORIGINAL PEOPLES USE AND OCCUPATION WITHIN THE STUDY AREA?

Test pits were generally moderately deep (<800mm) and comprised relatively intact soil profiles with clear boundaries. No Aboriginal objects were recovered from any of the excavated test pits. Test Pits 7, 9, and 10 displayed signs of minor disturbance in the A horizon related to historic land use. Test pits 3 and 12 comprised a layer of historic fill (to a maximum depth of 400mm) which contained glass, brick, plastic, mixed clay, nails and straws overlaid on the dark brown topsoil. The majority of these test pits were located along the fence line, indicating it is likely that this fill is reflective of historic land use associated with the homestead mentioned by Uncle Les Simon in the vicinity of the study area.

Archaeological assessments undertaken within the vicinity of the study area have found that proximity to permanent water sources often correlates to long-term occupational patterns (NSW Archaeology 2006 & 2013; KNC 2017; Lantern Heritage 2023). Subsurface archaeological investigations have uncovered generally low densities of artefacts and high densities of shell (KNC 2017; 2020), indicating the region was likely used as a travel corridor and the coastal hinterland was utilised periodically for hunting and gathering (KNC 2020). Higher density sites are more likely to occur in undisturbed contexts and in proximity to the coastline, creeks and along the banks of the Clyde River and its tributaries and *intact* subsurface archaeological deposits are less likely to occur where the landform has been modified (NSW Archaeology 2006; Navin Officer Heritage Consultants 2000; Lantern Heritage 2023).

WHAT TYPES OF RAW MATERIALS, ARTEFACT TYPES AND TOOL TYPES ARE PRESENT WITHIN THE ASSEMBLAGE? WHAT TYPES OF STONE TOOL TECHNOLOGY ARE PRESENT WITHIN THE SITES? HAVE THE TEST EXCAVATIONS REVEALED OTHER SITE TYPES SUCH AS HEARTHES, HEATING OVENS, KNAPPING FLOORS OR OTHER FOCI OR ACTIVITIES AREAS?

The test excavation program did not recover any artefactual material or reveal any hearths or heating ovens or any other site feature that might indicate Aboriginal land use or occupation. All test pits comprised small, natural marine shell inclusions between 300-800mm as soils transitioned to the marine beach sand layer. There was evidence of burnt clay/brick in Test Pit 7, this is reflective of a historic refuse associated with the homestead rather than evidence of Aboriginal occupation.

Larger shell inclusions in Test Pits 2, 4, 8 between 300-600mm comprised mussel and one turbo shell identified in Test Pit 4. The shell is not representative of an Aboriginal shell midden as the shells were sparsely represented in the soil profiles and there was no evidence of human occupation such as charcoal, soil discolouration, or lithic material or bones. The condition of the shell fragments does not suggest significant age. The largest shell accumulation (mussels and oysters) across the excavation area was in Test Pit 12 which comprised a historic deposit above the beach sand layer and included shale, sandstone, brick glass, plastic and metal fragments. This material is reflective of historic land use.

DO THE RESULTS OF THE TEST EXCAVATION DEMONSTRATE ANY EVIDENCE OF DISTURBANCE WITHIN THE STUDY AREA? AND WHAT CAN THE ARTEFACT ASSEMBLAGE (OR LACK THEREOF) INDICATE ABOUT PREVIOUS LAND USE BY ABORIGINAL PEOPLE?

The current test excavations investigated a landform that was expected to contain evidence of Aboriginal land use and or occupation. Several test pits exhibited signs of disturbance related to historic land use. The lack of evidence of past Aboriginal land indicates that the study area was more likely to have been utilised as a transitory route on the way to longer term occupational sites along the coastline, and along the tributaries of the Clyde River and Hanging Rock Creek to the north and south.

The marine sand layer indicates the study area was once intertidal or that the land between the study area and the current ocean front has been reclaimed.

9. Impact assessment

The study area contained landform features that indicated the presence of Aboriginal occupation due to the relatively flat and sheltered landscape, results of previous assessments in the local area in similar landforms which identified sites with artefact and shell features, cultural contributions during the archaeological survey which indicated the study area could have been a potential short term campsite and overall lack of observable ground disturbance.

Archaeological test excavations undertaken within the study area did not identify any evidence of Aboriginal occupation or land use. Cultural contributions during the test excavation indicated that whilst the study area was likely to have been used a short term campsite, it had previously been utilised as a horse paddock, according to Uncle Les Simon, associated with an historic homestead (c. 1930s) adjacent to the study area. Several test pits displayed some degree of disturbance from historic land use. The remainder of the test pits contained relatively intact soil profiles.

The lack of evidence of past Aboriginal land use is likely due to the study area being utilised as a transitory route between longer term occupational sites along the coastline, and along the tributaries of the Clyde River and Hanging Rock Creek to the north and south.

The proposed works would involve the demolition of the existing buildings and construction of three, four level apartment blocks. Associated works will include bulk excavations for the provision of basement parking and landscaping. The slope along the western boundary is not proposed to be impacted under the draft plan of works (Figure 2 - Figure 3).

No Aboriginal objects or Aboriginal cultural heritage values will be impacted by the proposed development. An AHIP under section 90 of the NPW Act is not required for the development

10. Recommendations

The following recommendations are based on consideration of:

- Statutory requirements under the *National Parks and Wildlife Act 1974* as amended.
- The potential and known impacts from the proposed works.
- The archaeological assessment and the findings of the test excavation.

SUMMARY OF ASSESSMENT FINDINGS:

- Desktop assessment identified the study area as being a sensitive landform, in close proximity to waters and high resource zones. Historical imagery indicated the study area had not been subjected to high levels of disturbance. No Aboriginal sites were recorded on AHIMS within the study area but assessments in the surrounding region suggested the study area had the potential to contain evidence of Aboriginal occupation in the form of artefact and shell features.
- An archaeological survey was undertaken, no Aboriginal objects were identified however cultural contributions from Elder Bill Davis indicated the study area could likely have been used as a campsite. The observable low disturbance, sensitive landform and with advice from Elder Bill Davis, ELA recommended test excavations to identify whether Aboriginal objects were present and to understand the nature and extent.
- Test excavations undertaken within the study area did not identify any evidence of Aboriginal occupation or land use. No Aboriginal objects were identified and no other features or evidence to suggest that Aboriginal occupation had occurred. The test pits contained relatively intact soil profiles, indicating the study area is more likely to have been utilised as a transitory route between campsites along the coastline.
- The Aboriginal Heritage investigations have concluded that no Aboriginal objects or places will be harmed by the development and an AHIP is not required prior to undertaking the proposed works.

Based on the findings of the Aboriginal heritage investigations, the following is recommended:

RECOMMENDATION 1 – NO FURTHER ASSESSMENT OR AHIP IS REQUIRED

No further assessment is required for the study area and the proposed development may proceed with caution without an AHIP. However, general measures will need to be adhered to during the construction activities and the following **Unexpected Finds Procedures** will need to be followed.

- Aboriginal objects are protected under the NPW Act regardless of whether they are registered on AHIMS or not. If suspected Aboriginal objects, such as stone artefacts are located during future works, works must cease, and an archaeologist called in to assess the finds.
- If the finds are found to be Aboriginal objects, Heritage NSW must be notified under Section 89A of the NPW Act. Appropriate management and avoidance or an Aboriginal Heritage Impact Permit must then be sought if Aboriginal objects are to be moved or harmed.
- In the extremely unlikely event that human remains are found, works should immediately cease, and the NSW Police should be contacted. If the remains are suspected to be Aboriginal, Heritage NSW may also be contacted at this time to assist in determining appropriate management

References

ANU Archaeological Consultancies, 1986. *An Archaeological Investigation of the North Batemans Bay Sewerage Scheme*. A Report to Eurobodalla Shire Council.

Australia ICOMOS, 2013. *The Burra Charter: The Charter for Places of Cultural Significance*.

Australian Heritage Commission, 2002. *Ask First: A Guide to Respecting Indigenous Heritage Places and Values*.

Australian Heritage Database accessed online 16 April 2024 <http://www.environment.gov.au/cgi-bin/ahdb/search.pl>.

Boot, P.G, 2002. *Didthul, Bhundoo, Gulga and Wadbilliga: An Archaeological Study of the Aboriginals of the New South Wales South Coast Hinterland*. Unpublished PhD Thesis, Australian National University ACT.

Department of Environment, Climate Change and Water (DECCW), 2010a. *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW*, Hurstville, NSW.

Department of Environment, Climate Change and Water (DECCW), 2010b. *Aboriginal cultural heritage consultation requirements for proponents 2010*. Hurstville, NSW.

Department of Environment, Climate Change and Water (DECCW), 2010c. *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW*, Hurstville, NSW.

Donaldson, 2007. *Eurobodalla Aboriginal Heritage Study Stage Three – Understanding and Managing Aboriginal Cultural Heritage*. Prepared for the Eurobodalla Aboriginal Heritage Steering Committee, Eurobodalla Shire Council, Department of Environment and Climate Change, Southern Rivers Catchment Management Authority, Local Aboriginal Land Councils, Elders Groups and Aboriginal Community Members.

eSpade, Soil Profile Report – Profile 10 accessed online 6 May 2024
<https://www.environment.nsw.gov.au/espade2webapp/report/profile/18055>

eSpade, Soil Profile Report – Profile 11, accessed online 6 May 2024
<https://www.environment.nsw.gov.au/espade2webapp/report/profile/18054>.

Eurobodalla Local Environmental Plan 2012 accessed online 16 April 2024
<https://legislation.nsw.gov.au/view/html/inforce/current/epi-2012-0333>.

Howitt, A.W. 1904. *The Native Tribes of South-east Australia*. Macmillan and Co., Limited, London.

Kelleher Nightingale Consulting Pty Ltd, 2017. *Batemans Bay Bridge Replacement – Aboriginal Cultural Heritage Assessment*. Prepared for Aurecon on behalf of NSW Roads and Maritime Services.

Kelleher Nightingale Consulting Pty Ltd, 2020. *South Batemans Bay Link Road – Aboriginal Cultural Heritage Assessment*. Prepared for Transport for New South Wales.

Lantern Heritage, 2023. *2A Myamba Parade, Surfside – Aboriginal Cultural Heritage Assessment Report*. Report to Acorn Project Advisory.

Lampert, R.J., 1971. *Burrill Lake and Currarong*, Australian National University, Research School of Pacific Studies, Department of Prehistory.

Navin Officer Heritage Consultants, 2000. *Aboriginal Midden Site Cullendulla Creek 12 North Batemans Bay NSW – Subsurface Testing Program Lot 1 DP875573*. Prepared for Alston Pty Ltd and NSW NPWS.

New South Wales Department of Planning, Industry and Environment, *Southeast Corner – subregions*, accessed online 6 May 2024 <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Bioregions/bioregions-south-east-corner.pdf>.

New South Wales State Heritage Inventory accessed online 16 April 2024 <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2120116>.

New South Wales *National Parks and Wildlife Act 1974*.

New South Wales *Heritage Act 1977*.

New South Wales Heritage Office, 2015. *Assessing Heritage Significance*.

New South Wales National Parks & Wildlife Service, 2021. *Ben Boyd National Park and Bell Bird Creek Nature Reserve Plan of Management*.

New South Wales Archaeology Pty Limited, 2006. *Proposed Power Route, Skid Ridge Road Murramarang National Park, Durras, NSW – Aboriginal Archaeological Assessment*. Prepared for NGH Environmental.

New South Wales Archaeology, 2013. *Wharf Road Shared Pathway – Aboriginal Cultural Heritage Assessment Report*. Prepared for Eurobodalla Shire Council.

Office of Environment and Heritage, 2011. *Guide to Investigating, Assessing, and Reporting on Aboriginal Cultural Heritage in New South Wales*.

Tindale, N 1974. *Aboriginal tribes of Australia: Their Terrain, Environmental Controls, Distribution, Limits, and Proper Names / by Norman B. Tindale*, with an Appendix on Tasmanian Tribes by Rhys Jones, Australian National University Press, 1974.

Appendix A – AHIMS Search Results



AHIMS Web Services (AWS) Extensive search - Site list report

Your Ref/PO Number : 24SYD8128
Client Service ID : 883966

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
58-4-1386	South Batemans Bay Link Road AFT 2	GDA	56	244152	6042384	Open site	Destroyed	Artefact : -		
	Contact	Recorders						Permits	4813	
58-2-0262	Yarrabee Site 1	AGD	56	245500	6041700	Open site	Valid	Artefact : -	Open Camp Site	1518
	Contact	Recorders						Permits		
58-4-0141	Surfside;	AGD	56	246600	6045500	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits	1501	
58-4-0224	CC4 (Cullendulla Creek)	AGD	56	247250	6045950	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders						Permits		
58-4-0197	Surfside Recreation Reserve;	AGD	56	245600	6045080	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
58-4-0426	Surfside Burial;	AGD	56	245700	6045200	Open site	Valid	Burial : -, Shell : -, Artefact : -	Burial/s,Midden	2007,2008
	Contact	Recorders						Permits		
58-4-1273	Batemans Bay Artefact Scatter 1	AGD	56	245044	6045672	Open site	Valid	Artefact : 1		103884
	Contact	Recorders						Permits	3064,3169,4266	
58-4-0956	KPII3	AGD	56	245095	6046140	Open site	Valid	Artefact : 14		98990
	Contact	Recorders						Permits	2099,2100	
58-4-0198	Delkira Close;	AGD	56	246170	6045480	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits		
58-4-0234	CC14 (Cullendulla Creek)	AGD	56	246210	6045900	Open site	Valid	Shell : -, Artefact : -	Midden,Open Camp Site	1881
	Contact	Recorders						Permits		
58-3-0003	N12	AGD	56	246250	6046700	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits		
58-4-0006	Bateman,Batemans Bay;	AGD	56	246400	6045400	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits	1503,3708	
58-4-0229	CC9 (Cullendulla Creek)	AGD	56	246410	6045600	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders						Permits		
58-2-0225	Schnapper Point;Batemans Bay;	AGD	56	242983	6045777	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
58-4-1070	PAD 4 (cnr Princes/Kings Highway)	AGD	56	245370	6046730	Open site	Partially Destroyed	Potential Archaeological Deposit (PAD) : 1		98246,98990
	Contact	Recorders						Permits	1927,1928,2099,2100	
58-4-1511	Batemans Bay IPI	GDA	56	245548	6045372	Open site	Valid	Artefact : -, Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders						Permits	5091,5216	

Report generated by AHIMS Web Service on 16/04/2024 for Kate Storan for the following area at Datum :GDA, Zone : 56, Eastings : 242173.0 - 248173.0, Northings : 6041068.0 - 6047068.0 with a Buffer of 0 meters. Number of Aboriginal sites and Aboriginal objects found is 117

This information is not guaranteed to be free from error omission. 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 8



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 24SYD8128

Client Service ID : 883966

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
58-4-0223	CC3 (Cullendulla Creek)	AGD	56	247300	6045670	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders	Philip Boot					Permits		
58-4-1525	Batemans Bay Coastal Walk site 22 - BBWCW22	GDA	56	247763	6041475	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders	Ms.Christine Gant-Thompson,Lantern Heritage Pty Ltd - Tathra					Permits	5096	
58-4-1379	Mackay Park IF 1	GDA	56	244247	6044652	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Matthew Barber,NGH Heritage - Fyshwick					Permits		
58-4-0793	South Batemans Bay IF 2,SBB IF2;	GDA	56	244343	6041590	Open site	Destroyed	Artefact : -	Isolated Find	3638
	Contact	Recorders	Mr.Kelvin Officer,Mr.Matthew Kelleher,Kelleher Nightingale Consulting Pty Ltd (Ge					Permits	2323	
58-4-0131	Batehaven;	AGD	56	244900	6040900	Open site	Valid	Artefact : -	Open Camp Site	53
	Contact	Recorders	R.K Barz					Permits		
58-4-1278	BBAS1 (Nelligen)	GDA	56	245044	6045672	Open site	Valid	Artefact : -		103884
	Contact	Recorders	Robert Paton Archaeological Studies					Permits	4266	
58-4-1581	BBH CMT1	GDA	56	245128	6044084	Open site	Valid	Modified Tree (Carved or Scarred) : -		
	Contact	Recorders	Ms.Lyn O'Brien,Past Traces Pty Ltd					Permits		
58-4-0199	Surfside Headland East;	AGD	56	246670	6045350	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	H Marshall					Permits	1501	
58-4-0230	CC10 (Cullendulla Creek)	AGD	56	246690	6045350	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders	H Cooke					Permits	1501	
58-4-1183	LDIF1 (Lincoln Downs isolated Find 1)	AGD	56	245322	6045523	Open site	Valid	Artefact : 1		99847
	Contact	Recorders	Navin Officer Heritage Consultants Pty Ltd					Permits		
58-4-1263	KPH3A	AGD	56	245370	6046390	Open site	Valid	Artefact : 1		
	Contact	Recorders	Ms.Trish Saunders					Permits		
58-4-0898	Cullendulla 2	AGD	56	247390	6046600	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	Vivienne Wood					Permits		
58-4-0151	Cullendulla Creek;Batemans Bay;	AGD	56	247500	6045800	Open site	Valid	Shell : -, Artefact : -	Midden	456
	Contact	Recorders	Phil Hughes					Permits		
58-4-0790	South Batemans Bay 3;SBB 3;	AGD	56	245820	6041110	Open site	Valid	Artefact : -	Open Camp Site	3638
	Contact	Recorders	Mr.Kelvin Officer					Permits		
58-4-0087	Observation Head 14/176;	AGD	56	246330	6042120	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	Miss Marjorie Sullivan					Permits		
58-4-0908	N13	AGD	56	246450	6046300	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders	N.K Hall					Permits		
58-4-0518	Square Head;	AGD	56	247930	6045300	Open site	Valid	Artefact : -	Open Camp Site	

Report generated by AHIMS Web Service on 16/04/2024 for Kate Storan for the following area at Datum :GDA, Zone : 56, Eastings : 242173.0 - 248173.0, Northings : 6041068.0 - 6047068.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 117

This information is not guaranteed to be free from error omission. 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 2 of 8



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 24SYD8128

Client Service ID : 883966

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
	Contact	Recorders						Permits		
58-1-0372	None;	AGD	56	242200	6043000	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits		
58-4-0231	CC11 (Cullendulla Creek)	AGD	56	246640	6045320	Open site	Valid	Artefact : -, Shell : -	Midden,Open Camp Site	1881
	Contact	Recorders						Permits		
58-4-0235	CC15 (Cullendulla Creek)	AGD	56	246750	6046240	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders						Permits		
58-4-0652	UM 5	AGD	56	243300	6046100	Open site	Valid	Shell : -, Artefact : -	Midden	2253
	Contact	Recorders						Permits		
58-4-0947	ST-1.	AGD	56	244333	6044607	Open site	Destroyed	Modified Tree (Carved or Scarred) : -		
	Contact	Recorders						Permits		
58-4-0797	South Batemans Bay 1;SBB 1;	GDA	56	244694	6041551	Open site	Destroyed	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits		
58-4-0149	Site 1;Batemans Bay;	AGD	56	245400	6045600	Open site	Valid	Artefact : -	Open Camp Site	99519
	Contact	Recorders						Permits		
58-4-1010	KPH5	AGD	56	245435	6045865	Open site	Valid	Artefact : 1		98990
	Contact	Recorders						Permits		
58-4-1098	GRAS1	AGD	56	246160	6041286	Open site	Valid	Artefact : -		
	Contact	Recorders						Permits		
58-4-0512	Surfside;	AGD	56	245500	6045100	Open site	Valid	Shell : 1, Artefact : -	Open Camp Site	100466,10374
	Contact	Recorders						Permits		
58-4-1553	Dolphin Ave 01	GDA	56	245901	6043443	Open site	Valid	Artefact : -		2685,3618,3821
	Contact	Recorders						Permits		
58-4-0132	Batehaven;	AGD	56	244900	6041100	Open site	Valid	Artefact : -	Open Camp Site	53
	Contact	Recorders						Permits		
58-4-1360	BB-BR1	GDA	56	245157	6046287	Open site	Valid	Artefact : -, Shell : -		
	Contact	Recorders						Permits		
58-4-0233	CC13 (Cullendulla Creek)	AGD	56	246120	6046100	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders						Permits		
58-4-1267	Batemans Bay High School(BBHS) 1	GDA	56	246354	6042488	Open site	Valid	Shell : 1		101180
	Contact	Recorders						Permits		
58-4-0085	Batchaven 14/227a	GDA	56	248101	6041081	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
58-4-0196	Garden Bay	GDA	56	248138	6041071	Open site	Valid	Artefact : -	Open Camp Site	1579

Report generated by AHIMS Web Service on 16/04/2024 for Kate Storan for the following area at Datum :GDA, Zone : 56, Eastings : 242173.0 - 248173.0, Northings : 6041068.0 - 6047068.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 117

This information is not guaranteed to be free from error omission. 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 3 of 8



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 24SYD8128

Client Service ID : 883966

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
	Contact	Recorders						Permits		
58-4-0792	South Batemans Bay IF 1;SBB IF1;	GDA	56	244054	6041960	Open site	Destroyed	Artefact : -	Isolated Find	3638
	Contact	Recorders						Permits		
58-4-0130	Bateman;	AGD	56	244300	6041900	Open site	Valid	Artefact : -	Open Camp Site	53
	Contact	Recorders						Permits		
58-4-0934	Batemans Bay Public School Scarred Tree	AGD	56	244424	6044786	Open site	Destroyed	Modified Tree (Carved or Scarred) : 1		97604
	Contact	Recorders						Permits		
58-4-0789	South Batemans Bay 2;SBB 2;	AGD	56	245370	6041090	Open site	Valid	Artefact : -	Open Camp Site	3638
	Contact	Recorders						Permits		
58-4-0899	surfside 1	AGD	56	245930	6046460	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits		
58-4-1099	GRAS2	AGD	56	246082	6041348	Open site	Valid	Artefact : -		
	Contact	Recorders						Permits		
58-4-0901	Surfside 3	AGD	56	245960	6046180	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits		
58-4-0900	Surfside 2	AGD	56	245960	6046450	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
58-4-0088	Batehaven 14/145b	AGD	56	246590	6045450	Open site	Valid	Shell : -, Artefact : -	Midden	101389,101391
	Contact	Recorders						Permits		
58-4-1343	Observation Head 1	GDA	56	247353	6042331	Open site	Destroyed	Artefact : -, Shell : 1		1503,3708
	Contact	Recorders						Permits		
58-4-0225	CCS (Cullendulla Creek)	AGD	56	247270	6045950	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders						Permits		
58-4-0155	West Bank Cullendulla Creek;Cullendulla Creek;Batemans Bay;	AGD	56	247740	6045783	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
58-4-1069	PAD 3 (cnr Princes/Kings Highway)	AGD	56	245500	6046500	Open site	Partially Destroyed	Potential Archaeological Deposit (PAD) : 1		98246,98990
	Contact	Recorders						Permits		
58-4-0659	CR-4	AGD	56	245650	6046700	Open site	Valid	Artefact : 3, Shell : 1	Open Camp Site	2319
	Contact	Recorders						Permits		
58-4-0795	South Batemans Bay IF 4;SBB IF4;	GDA	56	245013	6041350	Open site	Destroyed	Artefact : -	Isolated Find	3638
	Contact	Recorders						Permits		
58-4-1289	B Bay Shell 2	GDA	56	245050	6045603	Open site	Valid	Shell : 100		103884
	Contact	Recorders						Permits		

Report generated by AHIMS Web Service on 16/04/2024 for Kate Storan for the following area at Datum :GDA, Zone : 56, Eastings : 242173.0 - 248173.0, Northings : 6041068.0 - 6047068.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 117

This information is not guaranteed to be free from error omission. 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 4 of 8



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 24SYD8128

Client Service ID : 883966

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
58-4-0195	Catalina Country Club;	AGD	56	245100	6043550	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders		Mr.Allan Lance				Permits		
58-4-0144	Batehaven;	AGD	56	246400	6042200	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders		Miss.Marjorie Sullivan				Permits		
58-4-0219	Little Bywong II;	AGD	56	247850	6046550	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders		I Farrington, Doctor.Sue Feary, Mr.Douglas Williams				Permits	180	
58-4-1431	Observation Head Ochre site	GDA	56	247306	6042366	Open site	Valid	Ochre Quarry : -		
	Contact	Recorders		Onsite Cultural Heritage Management - Narooma, Mr.Gerard Niemoeller				Permits		
58-4-1109	KPI16 (PAD4)	AGD	56	245345	6046707	Open site	Valid	Artefact : 1		98990
	Contact	Recorders		Ms.Trish Saunders				Permits	2099,2100	
58-4-1561	Batemans Bay AS1	GDA	56	245562	6045337	Open site	Valid	Artefact : -		
	Contact	Recorders		Biosis Pty Ltd - Wollongong, Mrs.Samantha Keats				Permits	5091,5216	
58-4-0694	Liamena 2;	AGD	56	245950	6046730	Open site	Valid	Artefact : -	Isolated Find	
	Contact	Recorders		Mr.Peter Kuskie				Permits	767	
58-4-0232	CC12 (Cullendulla Creek)	AGD	56	246600	6045300	Open site	Valid	Artefact : -, Shell : -	Midden, Open Camp Site	1881, 101389, 101391
	Contact	Recorders		H Cooke				Permits	1503, 1522, 3076, 3708	
58-4-0024	Batehaven Bay;	AGD	56	247300	6041900	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders		A Bryden				Permits		
58-4-0227	CC7 (Cullendulla Creek)	AGD	56	247200	6045770	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders		Philip Boot				Permits		
58-4-0086	Batehaven 14/182	GDA	56	247642	6041502	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders		Miss.Marjorie Sullivan, Ms.Christine Gant-Thompson, Lantern Heritage Pty Ltd - Tat				Permits		
58-4-0905	Cullendulla Backwater	AGD	56	247440	6045580	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders		Vivienne Wood				Permits		
58-4-1526	Batemans Bay Coastal Walk site 23 - BBCW23	GDA	56	247763	6041475	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders		Ms.Christine Gant-Thompson, Lantern Heritage Pty Ltd - Tathra				Permits	5096	
58-4-1532	Batemans Bay Coastal Walk site 35 - BBCW35	GDA	56	247876	6041110	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders		Ms.Christine Gant-Thompson, Lantern Heritage Pty Ltd - Tathra				Permits	5096	
58-4-0649	UM 7	AGD	56	242900	6043800	Open site	Valid	Artefact : -	Open Camp Site	2253
	Contact	Recorders		Robert Paton				Permits		
58-4-1068	PAD 2 (cnr Princess/Kings Highway)	AGD	56	245520	6046075	Open site	Destroyed	Potential Archaeological Deposit (PAD) : 1		98246, 98990

Report generated by AHIMS Web Service on 16/04/2024 for Kate Storan for the following area at Datum :GDA, Zone : 56, Eastings : 242173.0 - 248173.0, Northings : 6041068.0 - 6047068.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 117

This information is not guaranteed to be free from error omission. 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 5 of 8



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 24SYD8128

Client Service ID : 883966

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
	Contact	Recorders						Permits		
58-4-0061	Batemans Bay;	AGD	56	245620	6043840	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
58-4-0917	Surfside Playing	AGD	56	245640	6045580	Open site	Valid	Artefact : -, Shell : -		
	Contact	Recorders						Permits	5052	
58-4-1365	Korners Park AFT 1	GDA	56	244869	6045438	Open site	Valid	Artefact : -		103884
	Contact	Recorders						Permits	4266	
58-4-1385	South Batemans Bay Link Road AFT 1	GDA	56	244072	6042007	Open site	Partially Destroyed	Artefact : -		
	Contact	Recorders						Permits	4813	
58-4-1338	Myamba Parade Midden	GDA	56	246709	6045610	Open site	Valid	Shell : -, Potential Archaeological Deposit (PAD) : -		105328,105329
	Contact	Recorders						Permits		
58-4-0228	CC8 (Cullendulla Creek)	AGD	56	247150	6045250	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders						Permits		
58-4-1225	Caseys Beach Burial	GDA	56	247371	6041896	Open site	Valid	Burial : 1		
	Contact	Recorders						Permits		
58-4-0222	CC2 (Cullendulla Creek)	AGD	56	247300	6045690	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders						Permits		
58-3-0002	Bateman's Bay	AGD	56	247450	6044750	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
58-4-0540	Clyde River Burial;	AGD	56	244700	6045500	Open site	Valid	Burial : -, Shell : -, Artefact : -	Burial/s,Midden	2100
	Contact	Recorders						Permits		
58-4-0170	Ritas Site;R.A.Hansen;	AGD	56	244820	6044210	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits		
58-4-1287	B Bay Shell 3	GDA	56	244948	6045708	Open site	Valid	Shell : 100		103884
	Contact	Recorders						Permits	4266	
58-4-0191	BBP5;	AGD	56	244900	6044400	Open site	Valid	Shell : -, Artefact : -	Midden	1140
	Contact	Recorders						Permits	1496	
58-4-1009	KPH4	AGD	56	245050	6045956	Open site	Valid	Artefact : 1		98990
	Contact	Recorders						Permits	2099,2100,5052	
58-4-1268	Batemans Bay High School (BBHS) 2	GDA	56	246352	6042457	Open site	Valid	Artefact : 1, Shell : 1		101180
	Contact	Recorders						Permits	3024	
58-4-0695	Liamena 1;	AGD	56	246150	6046730	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders						Permits	767	
58-4-0220	Little Bywong 1;	AGD	56	248000	6046500	Open site	Valid	Artefact : -	Open Camp Site	

Report generated by AHIMS Web Service on 16/04/2024 for Kate Storan for the following area at Datum :GDA, Zone : 56, Eastings : 242173.0 - 248173.0, Northings : 6041068.0 - 6047068.0 with a Buffer of 0 meters. Number of Aboriginal sites and Aboriginal objects found is 117

This information is not guaranteed to be free from error omission. 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 6 of 8



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 24SYD8128

Client Service ID : 883966

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
	Contact	Recorders				I Farrington, Doctor Sue Feary, Mr. Douglas Williams		Permits	180	
58-4-0650	UM 6	AGD	56	243300	6043800	Open site	Valid	Artefact : -	Open Camp Site	2253
	Contact	Recorders				Robert Paton		Permits		
58-4-0954	KPH1	AGD	56	245200	6045640	Open site	Partially Destroyed	Shell : 3, Artefact : 28, Potential Archaeological Deposit (PAD) : 16		98905,98990
	Contact	Recorders				Ms.Trish Saunders, Ms.Trish Saunders, Doctor, Oliver Macgregor		Permits	1866,1867,1916,2099,2100	
58-4-0955	KPH2	AGD	56	245260	6046380	Open site	Valid	Artefact : 30		98990
	Contact	Recorders				Ms.Trish Saunders		Permits	2099,2100	
58-4-1536	Batemans Bay Coastal Walk site 38 - BBCW38	GDA	56	247389	6041969	Open site	Valid	Potential Archaeological Deposit (PAD) : -		
	Contact	Recorders				Ms.Christine Gant-Thompson, Lantern Heritage Pty Ltd - Tathra		Permits	5096	
58-4-0221	CC1 (Cullendulla Creek)	AGD	56	247320	6045670	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders				Philip Boot		Permits		
58-4-0226	CC6 (Cullendulla Creek)	AGD	56	247320	6045670	Open site	Valid	Shell : -, Artefact : -	Midden	1881
	Contact	Recorders				Philip Boot		Permits		
58-4-0190	BBP 4;	AGD	56	247500	6045350	Open site	Valid	Artefact : -	Open Camp Site	1140,101717
	Contact	Recorders				Mr.Allan Lance		Permits		
58-4-0902	Water Tank Track	AGD	56	247520	6046170	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders				Vivienne Wood		Permits		
58-4-1482	Batemans Bay Coastal Walk Site 1 (BBCW1)	GDA	56	247972	6041420	Open site	Partially Destroyed	Artefact : -		
	Contact	Recorders				Lantern Heritage Pty Ltd - Tathra, Lantern Heritage Pty Ltd - Tathra, Miss.Majella H.		Permits	5096	
58-4-0129	Bateman;	AGD	56	244200	6042100	Open site	Valid	Artefact : -	Open Camp Site	
	Contact	Recorders				R.K Barz		Permits		
58-4-1083	Mundara 1	AGD	56	245750	6045390	Open site	Valid	Burial : 1		
	Contact	Recorders				Chris Griffiths, Rod Wellington, Danielle Towers		Permits		
58-4-0791	South Batemans Bay 4;SBB 4;	AGD	56	245980	6041290	Open site	Valid	Artefact : -	Open Camp Site	3638
	Contact	Recorders				Mr.Kelvin Officer		Permits		
58-4-0794	South Batemans Bay IF 3;SBB IF3;	GDA	56	244773	6041450	Open site	Destroyed	Artefact : -	Isolated Find	3638
	Contact	Recorders				Mr.Kelvin Officer, Mr.Matthew Kelleher, Kelleher Nightingale Consulting Pty Ltd (Ge		Permits	2323	
58-4-0200	Oyster Farm Midden;	AGD	56	244700	6045550	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders				H Marshall		Permits		
58-4-1288	B Bay Shell 1	GDA	56	244861	6045562	Open site	Valid	Shell : 100		103884
	Contact	Recorders				Stuart Huys		Permits	4266	
58-4-1155	Bateman Bay High School	AGD	56	246244	6042635	Open site	Valid	Burial : 7		103145

Report generated by AHIMS Web Service on 16/04/2024 for Kate Storan for the following area at Datum :GDA, Zone : 56, Eastings : 242173.0 - 248173.0, Northings : 6041068.0 - 6047068.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 117

This information is not guaranteed to be free from error omission. 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 7 of 8



AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : 24SYD8128

Client Service ID : 883966

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
	Contact	Recorders						Permits		
58-4-0897	N30	AGD	56	246500	6046200	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		
58-4-0084	Batehaven 14/227b	GDA	56	248138	6041071	Open site	Valid	Shell : -, Artefact : -	Midden	
	Contact	Recorders						Permits		

** Site Status

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

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

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

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

Report generated by AHIMS Web Service on 16/04/2024 for Kate Storan for the following area at Datum :GDA, Zone : 56, Eastings : 242173.0 - 248173.0, Northings : 6041068.0 - 6047068.0 with a Buffer of 0 meters.. Number of Aboriginal sites and Aboriginal objects found is 117

This information is not guaranteed to be free from error omission. 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 8 of 8

Appendix B – Consultation Record

Contact	Organisation	Contacted by	Organisation	Method	Date	Comment/ response
AGENCY LETTERS 4.1.2 NOTIFICATION						
	National Native Title Tribunal	K Storan	ELA	Email	5/04/2024	Section 4.1.2 Letter requesting list of potentially interested stakeholders, information, response by 19 April 2024
	NTS Corp	K Storan	ELA	Email	5/04/2024	Section 4.1.2 Letter requesting list of potentially interested stakeholders, information, response by 19 April 2024
	Heritage NSW	K Storan	ELA	Email	5/04/2024	Section 4.1.2 Letter requesting list of potentially interested stakeholders, information, response by 19 April 2024
	Office of the Registrar	K Storan	ELA	Email	5/04/2024	Section 4.1.2 Letter requesting list of potentially interested stakeholders, information, response by 19 April 2024
	Batemans Bay Local Aboriginal Land Council	K Storan	ELA	Email	5/04/2024	Section 4.1.2 Letter requesting list of potentially interested stakeholders, information, response by 19 April 2024
	Eurobodalla Shire City Council	K Storan	ELA	Email	5/04/2024	Section 4.1.2 Letter requesting list of potentially interested stakeholders, information, response by 19 April 2024
Newspaper AD						
The Bay Post		K Storan	ELA	Online Ad	17/04/2024	Published Ad 17 April 2024 with a response date of 3 May 2024.
Agency Responses						
K Storan	ELA	Geospatial Searches	National Native Title Tribunal	Email	5/04/2024	South Coast People Freehold tenure 8/03/2024.
K Storan	ELA	Ros Carriage	Batemans Bay Local Aboriginal Land Council (LALC)	Email	5/04/2024	Thank you for the information. The Batemans Bay LALC would like to register our interest in this project. We have an elder site monitor who has experience in artefact identification and cultural heritage knowledge. We would be happy for him to monitor the project.
K Storan	ELA	The Aboriginal Owners Team	Office of Registrar	Email	08/04/2024	Recommended contacting LALC and joint manager coordinators Biamanga National Park and Gulaga National Park.
K Storan	ELA	Barry Gunther	Heritage NSW	Email	12/04/2024	RAP List Sent
K Storan	ELA	Nardi Arnold	Eurobodalla Shire Council	Email	5/04/2024	Recommended contacting LALC and provided details for additional stakeholders.
K Storan	ELA	Zoe Robertson	NTS Corp	Email	17/04/2024	The South Coast People are the registered native title claimants for this region and are contactable via their legal representatives Sandy Chalmers and Morgan Westley at notifications@ntscorp.com.au. Please send all correspondence to this address only.
Invitation to Register 4.1.3						
Diana Astin	Girragirra Murun Aboriginal Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Kylie Ann Bell	Gunyu (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Kaya Dawn Bell	Munyunga (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.

Hayley Bell	Wingikara (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Dean Bell	Yurwang Gundana Consultancy Cultural Heritage Services.	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Karia Lea Bond	Badu (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Lee-Roy James Boota	Wullung (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Noel Butler	Noel Butler	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Gordon Campbell	Gadhu Dreaming	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Richard Campbell	Guunamaa Dreaming Sites and Surveying	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Ros Carriage	Batemans Bay Local Aboriginal Land Council	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Simalene Carriage	Bilinga (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Newtown Carriage	Nundagurri Aboriginal Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Owen Carriage	South Coast NSW Aboriginal Elders	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Shane Carriage	Thauaira	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
John Carriage	Thoorga Nura	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Shaun Carroll	Merrigarn Indigenous Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Lilly Carroll	Didge Ngunawal Clan	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Marilyn Carroll-Johnson	Corroboree Aboriginal Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Graham Connolly	Jerrinja Consultants Pty Ltd	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Thomas Dahlstrom	Thomas Dahlstrom Offers ACH value by using 3D Laser and Drone technology	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
James Davis	James Davis	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Maureen Davis	South East Coast Gadu Elders (Yuin Nation)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Jason Davison	Jason Davison	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Shayne Dickson	Gunjeewong Cultural Heritage Aboriginal Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
John Dixon	Djirringanj Elders Federation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Lee Field	Barraby Cultural Services	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Bo Field	Yurrandaali	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Clive Freeman	Clive Freeman	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.

Steven Johnson	Ginninderra Aboriginal Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Karrial Johnson	Karrial (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Jesse Johnson	Muragadi Heritage Indigenous Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Pemulwuy Johnson	Pemulwuy (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Darleen Johnson	Murra Bidgee Mullangari Aboriginal Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Hika Te Kowhai	Walbunja (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Raymond Moon	Wingarra Wilay Aboriginal Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Wendy Morgan	Guntawang Aboriginal Resources Incorporated	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Robert Parson	Yerramurra (Murrin Clan/Peoples) and Taste of Tradition Native Aboriginal Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Carol Slater	Gilay Consultants	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Tom Slokee	Tom Slokee	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Basil Smith	Goobah Development PTY LTD (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Joanne Anne Stewart	Jerringong (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Ronald Stewart	Walgalu (Murrin Clan/Peoples)	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Sonione Wakabut Rogers	Sonione Wakabut Rogers	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Colin Walker	Gadu chts	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Raymond Weatherall	RAW Cultural Healing	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Noel Webster	Noel Webster	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Iris White	Iris White	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Serena Williams	Yukumbruk	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Arnold Williams	Ngunnawal Elders Corporation	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Sandy Chalmers	NTS Corp on behalf of South Coast People	K. Storan	ELA	Email	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Thomas Brown	Thomas Brown	K. Storan	ELA	Letter	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Les Simons	Chapman Clan	K. Storan	ELA	Letter	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Batemans Bay Aboriginal Corporation	Batemans Bay Aboriginal Corporation	K. Storan	ELA	Letter	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Bodalla Local Aboriginal Land Council	Bodalla Local Aboriginal Land Council	K. Storan	ELA	Letter	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.

Cobowra Local Aboriginal Land Council	Cobowra Local Aboriginal Land Council	K. Storan	ELA	Letter	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Merrimans Local Aboriginal Land Council	Merrimans Local Aboriginal Land Council	K. Storan	ELA	Letter	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Mogo Local Aboriginal Land Council	Mogo Local Aboriginal Land Council	K. Storan	ELA	Letter	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
NSW Aboriginal Land Council	NSW Aboriginal Land Council	K. Storan	ELA	Letter	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Wagonga Local Aboriginal Land Council	Wagonga Local Aboriginal Land Council	K. Storan	ELA	Letter	22/04/2024	Section 4.1.3 Letter regarding invitation to register for project, response requested by 6/05/2024.
Registration of Interest						
K Storan	ELA	Basil Smith	Goobah Development	Email	29/04/2024	Registered interest in the project
K Storan	ELA	Clive Freeman	Clive Freeman	Email	22/04/2024	Registered interest in the project
K Storan	ELA	Diana Astin	Girragirra Murun Aboriginal Corporation	Email	22/04/2024	Registered interest in the project
K Storan	ELA	Paul Boyd & Lilly Carroll	Didge Ngunawal Clan	Email	22/04/2024	Registered interest in the project
K Storan	ELA	Marilyn Carroll-Johnson	Corroboree Aboriginal Corporation	Email	23/04/2024	Registered interest in the project.
K Storan	ELA	Zoe Robertson	NTS Corp	Email	22/04/2024	Registered interest in the project; request to be kept informed throughout process
K Storan	ELA	John Carriage	Thoorga Nura	Email	22/04/2024	Registered interest in the project
K Storan	ELA	Wendy Morgan	Guntawang Aboriginal Resources Incorporated	Email	8/05/2024	Registered interest in the project.
K Storan	ELA	Ros Carriage	Batemans Bay Local Aboriginal Land Council (LALC)	Email	22/04/2024	Registered interest in the project
4.1.6 Letter to LALC and Heritage NSW						
	Heritage NSW	K Storan	ELA	Email	16/05/2024	Notification of RAPs for project
	Batemans Bay LALC	K Storan	ELA	Email	16/05/2024	Notification of RAPs for project
Test Excavation Methodology						
Clive Freeman	Clive Freeman	K Storan	ELA	Email	16/05/24	Sent test excavation and survey methodology for RAP review with a response date of 13 June 2024
Diana Astin	Girragirra Murun Aboriginal Corporation	K Storan	ELA	Email	16/05/24	Sent test excavation and survey methodology for RAP review with a response date of 13 June 2024
Paul Boyd & Lilly Carroll	Didge Ngunawal Clan	K Storan	ELA	Email	16/05/24	Sent test excavation and survey methodology for RAP review with a response date of 13 June 2024
Marilyn Carroll-Johnson	Corroboree Aboriginal Corporation	K Storan	ELA	Email	16/05/24	Sent test excavation and survey methodology for RAP review with a response date of 13 June 2024
Sandy Chalmers	South Coast People c/NTS Corp	K Storan	ELA	Email	16/05/24	Sent test excavation and survey methodology for RAP review with a response date of 13 June 2024
John Carriage	Thoorga Nura	K Storan	ELA	Email	16/05/24	Sent test excavation and survey methodology for RAP review with a response date of 13 June 2024
Wendy Morgan	Guntawang Aboriginal Resources Incorporated	K Storan	ELA	Email	16/05/24	Sent test excavation and survey methodology for RAP review with a response date of 13 June 2024

Ros Carriage	Batemans Bay Local Aboriginal Land Council (LALC)	K Storan	ELA	Email	16/05/24	Sent test excavation and survey methodology for RAP review with a response date of 13 June 2024
Basil Smith	Goobah Development	K Storan	ELA	Email	16/05/24	Sent test excavation and survey methodology for RAP review with a response date of 13 June 2024
Methodology RAP responses						
K Storan	ELA	Jodie	Girragirra Murun Aboriginal Corporation	Email	14/06/2024	At this stage Girra have no comments to add. Girragirra would like to be considered for fieldwork.
K Storan	ELA	Lilly Carroll & Paul Boyd	Didge Ngunawal Clan	Email	16/05/2024	We are all happy from our end with your methodology.
K Storan	ELA	Marilyn Carroll-Johnson	Corroboree Aboriginal Corporation	Email	5/06/2024	Supports methodology.
K Storan	ELA	John Carriage	Thoorga Nura	Email / Phone	16/05/2024	Thanks for providing the methodology report. It looks great. I have no comments to add.
K Storan	ELA	Wendy Morgan	Guntawang Aboriginal Resources Incorporated	Email / Phone	20/05/2024	Supports methodology.