

ABN 53106044366

PO Box 2135
Central Tilba NSW 2546
0427074901
www.nswarchaeology.com.au

4 April 2020

David Walker
Premise
154 Peisley St
PO Box 1963
Orange NSW 2800

Dear David

Bega Tafe Stage 2 Aboriginal Due Diligence Assessment

Introduction

NSW Archaeology Pty Ltd has been engaged to undertake an Aboriginal Due Heritage assessment of the proposed Stage 2 Connected Learning Centre (CLC) at 199 Auckland Street and 1 McKee Drive, Bega (Lot 1 DP1243054 and Lot 2 DP1243054), adjacent to the existing TAFE CLC (Stage 1 CLC). The land accommodating the proposed Stage 2 CLC would be excised from the existing portion of Lot 2 DP1243054 and consolidated with existing Lot 1, which hosts the Stage 1 CLC.

The portion of Lot 1 over which the Stage 2 CLC is proposed is currently unused and was originally part of the land hosting the Bega District Hospital and Emergency Department. A single building is located on the area which would be demolished. The site slopes to the north towards the Stage 1 CLC.

This letter has been prepared in accordance with the NSW Office of Environment and Heritage – OEH (formally NSW DECCW) *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*¹ (NSW DECCW 2010).

¹ Hereafter referred to as the *Due Diligence Code*.

For the purposes of this project, due diligence means ‘taking reasonable and practical steps to determine whether a person’s actions will harm an Aboriginal object and, if so, what measures can be taken to avoid that harm’ (NSW DECCW 2010: 18).

The *Due Diligence Code* outlines a number of steps to be adhered to in order to exercise due diligence when activities are undertaken that have the potential to cause harm to Aboriginal objects. The code stipulates that these steps should be followed in order to:

- identify whether or not Aboriginal objects are or are likely to be present in an area;
- ascertain whether or not the proposed activities are likely to harm Aboriginal objects (if present); and
- determine whether an Aboriginal Heritage Impact Permit (AHIP) application is required.

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

Summary, Conclusions and Recommendations

There are no previously recorded Aboriginal objects on the site. A field survey was undertaken on the 16th March 2020 with a sites officer from Bega Local Aboriginal Land Council (BLALC). The site was found to be highly disturbed and of negligible archaeological potential. No Aboriginal objects were found.

A discussion was also had with Graham Moore of the BLALC who indicated that the immediate local area is of cultural significance to the Aboriginal community, but that at the site, these values are compromised due to the high levels of previous impacts.

As a result of the assessment, the following conclusions are made:

- The site is highly disturbed by a history of high levels of land use since c. 1957;
- There are no known Aboriginal objects located in the activity area and the site is of very low archaeological potential;
- The site is located within a broader area of cultural significance but that these values are compromised due to the high levels of previous impacts to the site;
- No further heritage assessment is required; an AHIP is not required;

- There are no heritage constraints to the proposal; and
- The BLALC has indicated that there are no cultural constraints to the proposal but has requested that a sites officer be engaged to monitor the initial ground disturbance works at the site.

Proposed Impacts

It is proposed to develop a new educational establishment, being the Stage 2 TAFE NSW CLC. This would be located in the south-eastern extent of the site and to the south of the existing Stage 1 CLC.

The proposed Stage 2 CLC building would be a split-level building. The building would provide:

At the lower level:

- Approximately 594 square metres of multi-trade/workshop area;
- Approximately 242 square metres of covered outdoor bricklaying and forklift area;
- Approximately 172 square metres of storage;
- Approximately 228 square metres of teaching spaces (light green);
- Approximately 68 square metres of communications and other service areas (light blue); and
- Lift shaft and stairwell.

At the Upper level:

- Male and female amenities;
- Break out area (42 square metres);
- Staff offices, meeting spaces and kitchenette (194 square metres); and
- Educational areas, meeting spaces, kitchenette and deck (405 square metres).

A parking area is proposed adjacent (west) to the proposed CLC building, providing parking for 32 car parking spaces. The existing accessible parking space adjacent to the Stage 1 CLC would be relied upon in relation to both the Stage 1 and 2 CLC buildings.

Earthworks, including variable height retaining walls would be required to facilitate the development of the Stage 2 CLC and provide a developable building site. A number of non-native trees would be removed.

In summary, the proposal would result in extensive new disturbance to ground surfaces at the site.

AHIMS Site Search Results

A search of the NSW OEH Aboriginal Heritage Information Management System (AHIMS) has been undertaken in respect of this study (Search date: 3 March 2020). The search was for an area measuring six square kilometres encompassed by eastings: 752000-755000 and Northings: 5936000-5938000 (see Appendix 1). Eight Aboriginal objects are listed for this area, one of which is a duplicate recording and not discussed further here.

One Aboriginal site listed on AHIMS is located at 33 Girrween Crescent, east of the development site. The site is:

- AHIMS #62-6-465 located at 33 Girrween Crescent Bega. This site is a private collection of artefacts.

The location of this AHIMS site is shown on the figure below.

Archaeological Context

The following presents a review of relevant archaeological assessments conducted within the Bega township area in order to propose an appropriate predictive model of Aboriginal object type and location for the site.

Steele *et al.* (2001) conducted a survey of the Bega High School site. No sites were recorded however this was attributed at least in part to low levels of ground surface visibility. Steele *et al.* (2002) subsequently conducted subsurface investigations at which time 19 stone artefacts were recovered. The low levels of artefact density were attributed to prior disturbance.

Saunders (2003) surveyed the “Glen Mia” 35 hectare subdivision area on the southeastern outskirts of Bega. The area consisted of moderately inclined slopes separated by intermittent streams. Two scarred trees and four areas of archaeological potential were recorded. Ground visibility and hence the potential to locate artefactual material was low during the survey.

Saunders (2004) subsequently conducted subsurface testing and the salvage of artefacts in four PADs at “Glen Mia”. A total of 32 artefacts were recovered at an overall average density of 0.015 artefacts/m² and a highest density of 0.04 artefacts/m². All four identified PADs were found to contain an extremely low density of artefacts only. The dominant artefactual raw material was quartz, with some volcanics and chert.

Dibden (2005a) conducted a survey in relation to a proposed subdivision on the northeastern fringe of the township of Bega, adjacent to the Bega River. The area measured approximately 13 hectares. Two sites, each comprised of a single stone artefact, were identified. Based on the results of the field survey and a consideration of high levels of prior disturbance and geomorphology, the area was assessed to be low archaeological sensitivity.

Dibden (2005b) conducted a survey of a subdivision proposal at South Bega. Ten locales containing Aboriginal objects were recorded during the study. Generally ground exposure was low within the study area due to a thick ground cover of kikuyu. Given the low effective survey coverage achieved the survey results were not considered to be an accurate reflection of the archaeological status of the area.

A subsequent program of test excavation was carried out at the site resulting in the identification of a widespread yet variable density distribution of stone artefacts (Dibden 2006). The majority of Survey Units were found to possess artefacts in either very low or low densities. However, a number of Survey Units possessed relatively higher artefact densities which ranged from low/moderate to moderate. This result suggested a relatively higher level of occupation in these locales (low elevation, flat landforms near water) and that they were focal areas of activity. Given the absence of Survey Units with high artefact densities it was concluded that the proposal area was not utilised for intensive Aboriginal occupation. The artefact density figures suggest that the area was probably utilised sporadically for activities including hunting and gathering and movement through country.

The lithic assemblage was found to exhibit low levels of artefact variability and technical diversity (Dibden 2006). A limited range of artefact types were retrieved and this, in conjunction with generally low artefact densities, was interpreted to reflect a correspondingly limited range of behavioural activities that were undertaken. However, the presence of numerous collections of related artefacts produced during single knapping events indicated that generally, post-depositional processes, including those related to European

farming practices had had a negligible impact on the spatial integrity of the archaeological resource. Many of the identified knapping events possessed retouched microliths with or without usewear and one included an unretouched flake with usewear.

Dibden (2010) conducted subsurface testing at a number of locales for the Bega By-pass proposal. The average artefact density across the test excavation area, calculated by dividing the total number of artefacts by the total area excavated, is 5.5 artefacts per square metre. Artefact density in the test areas is either very low or low. The results compare with test excavation conducted at South Bega where comparable landforms, that is, high ridge crests located away from creek lines, were also found to contain very low or low density artefact distributions (cf. Dibden 2006).

Dibden (2016) conducted test excavation for a proposed 30 lot subdivision at Lot 22 DP 1214150 Tathra Road, Bega. The results revealed a very low density (4/sq m) and patchy distribution of artefacts. The assemblage was found to exhibit low technological and material diversity. The PADs exhibited considerable surface disturbance.

The review presented above indicates that in the Bega area stone artefacts are the most commonly recorded Aboriginal objects. Ceremonial places, human burials and scarred trees are also recorded, albeit in lower numbers. Based on the review of prior research conducted in the Bega area the following site predictions are made:

Stone artefacts located either on the ground surface and/or in subsurface contexts are the only site type with any potential to be present in the site. The raw materials used for artefact manufacture in the local area will include silcrete, quartz, chert and volcanics. Within the local area stone artefacts will be widely distributed across the landscape in a virtual continuum, but with significant variations in density in relation to different environmental factors. Artefact density and site complexity will be greater on elevated flat landforms near to a source of reliable water.

The study area is a simple slope landform (Plates 1 and 2). It has a gentle to moderate gradient and northerly aspect, falling away to a very minor 1st order drainage line located to the north. Such landforms with this degree of incline are typically predicted to be of low archaeological sensitivity and potential.

Given the environmental and geomorphological context it is predicted that archaeological evidence in the form of stone artefacts in the proposal area will be of very low or negligible density. Simple slopes are known to contain very low or low artefact density in the local area.



Photo 1. At the corner of McKee Drive and Auckland Street, looking north.



Photo 2. Looking east between the new Stage 1 CLC (left of photo) towards Auckland Street, with existing building on right. Note extensive earth works.



Figure 1 location of the AHIMS site closest to the development area.

Field Survey and Assessment

A survey of the study area was undertaken on 16 March 2020 by Andrew Pearce, NSW Archaeology Pty Ltd, and Ron Thomas, BLALC. The area was visually inspected and assessed with regard to any Aboriginal cultural heritage potential which may be present.

No Aboriginal objects were located during this assessment although exposed areas of ground surface were limited (c. 80 sq m). The site is grassed except for rows of established trees.

Generally, the ground surface of the site was assessed to have undergone high levels of prior disturbance.

No Aboriginal objects were found during the field inspection. Furthermore, the site was assessed to be of very low archaeological potential.

Conclusion

No Aboriginal objects were found during the field survey. This assessment has concluded that based on an understanding of Aboriginal land use (the predictive model), a visual inspection and the extent of previous impacts, the site is assessed to be of very low archaeological potential and sensitivity.

The Due Diligence Code of Practice (NSW DECCW 2010) - Step 4 of the Due Diligence Code of Practice (NSW DECCW 2010) indicates that where the assessment or visual inspection does not indicate that there are (or are likely to be) Aboriginal objects, the proponent can proceed with caution without an AHIP application. Section 5 provides further summary information of the legislative context relating to Aboriginal heritage in development contexts.

Conclusions and Recommendations

The assessment has concluded that based on environmental grounds and the extent of previous impacts, the activity area is unlikely to be archaeologically sensitive. Accordingly, further archaeological assessment and an AHIP is not required.

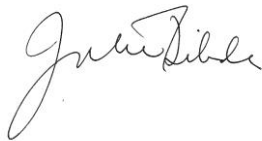
Graham Moore, BLALC, has indicated that the immediate local area is of cultural significance to the Aboriginal community, but that at the site, these values are compromised due to the high levels of previous impacts.

It is recommended that:

1. No further heritage assessment is required; an AHIP is not required;
2. There are no heritage constraints to the activity;
3. The BLALC has indicated that there are no cultural constraints but has requested that a sites officer be engaged to monitor the initial ground disturbance works at the site.
4. If Aboriginal objects are found while undertaking the activity (considered unlikely), the proponent must stop work and notify the NSW OEH; an AHIP may need to be sought.
5. If human skeletal remains are found while undertaking the activity (considered unlikely), the proponent must stop work immediately, secure the area to prevent unauthorized access and contact the NSW Police and OEH.

I trust this information is clear. However, do not hesitate to get in touch to discuss further if necessary.

Yours faithfully

A handwritten signature in cursive script, appearing to read 'Julie Dibden'.

Dr Julie Dibden
New South Wales Archaeology Pty Limited

References

- Dibden, J. 2005a Bega Eco-Neighbourhood Development, Bega, NSW. Aboriginal Archaeological Assessment A Report to Jenny Spinks.
- Dibden, J. 2005b Proposed Commercial, Residential and Industrial Subdivision Lot 4 DP1077434, Lot 1510 DP 1977898 & Lot 2432 DP 793758 South Bega NSW Aboriginal Archaeological Assessment. A report to Planning Initiatives.
- Dibden, J. 2006 Proposed Commercial, Residential and Industrial Subdivision Lot 4 DP1077434, Lot 1510 DP 1977898 & Lot 2432 DP 793758 South Bega NSW Subsurface Test Excavation. A report to Planning Initiatives.
- Dibden, J. 2010 RTA Proposed Bega Bypass Subsurface Test Excavation AHIP # 1111625.
- Dibden, J. 2016 Lot 22 DP 1214150 Tathra Road, Bega NSW Aboriginal Cultural Heritage Assessment Report.
- Saunders, P. 2003 “Glen Mia”, Bega, NSW Aboriginal Archaeological Survey. Report to Canberra Investment Corporation Limited.
- Saunders, P. 2004 “Glen Mia”, Bega, Archaeological Subsurface Testing and Artefacts Salvage in four PADs. Report to Canberra Investment Corporation Limited.
- Steele, D. and P. Douglas 2001 Bega High School NSW Report on Indigenous Archaeological Assessment of the site and Initial Aboriginal Community Consultation. Report to Department of Public Works.
- Steele, D., P. Douglas and D. Tuck 2002 Bega High School NSW A Report on Aboriginal Archaeological Test Investigation in the Stage 1 Development Area. Report to Department of Public Works.

Appendix 1

AHIMS Web Services (AWS)										Your Ref/PO Number : Bega Tech	
Extensive search - Site list report										Client Service ID : 490539	
SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status	SiteFeatures	SiteTypes	Reports	
62-6-0711	High St to Rawlinson St PAD (Bega Bypass)	GDA	55	753013	5936793	Open site	Valid	Potential Archaeological Deposit (PAD) : 1		101720.10194 5	
62-6-0712	Contact John Dixon Rawlinson St to Prospect St PAD (Bega Bypass)	Recorders GDA	Mr.Lance Syme 55	753092	5936369	Open site	Valid	Potential Archaeological Deposit (PAD) : 1	Permits 3227.3319	101720.10194 5	
62-6-0539	Contact John Dixon Glen Mia (PAD 4)	Recorders GDA	Mr.Lance Syme 55	754790	5936100	Open site	Valid	Potential Archaeological Deposit (PAD) :-	Permits 3227.3319	98874.99905	
62-6-0779	Contact 2TR Bega PAD01	Recorders GDA	Ms.Trish Saunders 55	755004	5936227	Open site	Valid	Potential Archaeological Deposit (PAD) : 1	Permits 1814.1815.1880	103673	
62-6-0054	Contact Bega West Bega;	Recorders AGD	Doctor.Julie Dibden,NSW 55	752300	5936800	Open site	Valid	Ceremonial Ring (Stone or Earth) :-	Permits 3995	99905	
62-6-0495	Contact 33 Girraween Cres. Bega (duplicate refer to 62-6-0465)	Recorders AGD	ASRSTS 55	753620	5936570	Open site	Deleted	Ceremonial Ring (Stone or Earth) :- Artefact :- Shell :-	Permits 39905	99905	
62-6-0465	Contact 33 Girrween Crescent, Bega. same as 62-6-0495	Recorders AGD	Philip Boot,Mr.Graham Moore 55	753620	5936570	Open site	Valid	Artefact :- Ceremonial Ring (Stone or Earth) :-	Permits 39905	99905	
62-6-0477	Contact BHS1	Recorders AGD	Philip Boot 55	753620	5936950	Open site	Valid	Artefact : 19	Permits 39905	99905	
	Contact Dominic Steele Archaeological Consulting	Recorders AGD	Dominic Steele 55	753620	5936950	Open site	Valid	Artefact : 19	Permits 39905	99905	

Report generated by AHIMS Web Service on 11/03/2020 for Julie Dibden for the following area at Datum: GDA, Zone : 55, Eastings : 752000 - 755000, Northings : 5936000 - 5938000 with a Buffer of 50 meters. Additional Info : Archaeological Assessment, Number of Aboriginal sites and Aboriginal objects found is 8

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