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**SENIORS HOUSING PROJECT
87-89 TWEED COAST ROAD
HASTINGS POINT NSW**

ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT

June 2025

Tricare (Hastings) Limited





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ABBREVIATIONS

ACHAR	Aboriginal Cultural Heritage Assessment Report
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
AHMP	Aboriginal Heritage Management Plan
DA	Development Application
DCP	Development Control Plans
DECCW	Department of Environment, Climate Change and Water (now Heritage NSW)
EARS	Environmental Assessment Requirements
EIS	Environmental Impact Assessment
EPA	Environmental Planning and Assessment
ESD	Ecological Sustainable Design
ILU	Independent Living Units
LALC	Local Aboriginal Land Council
LEP	Local Environmental Plan
NPW	National Parks and Wildlife
PAD	Potential Archaeological Deposit
Proposal	The proposed Seniors Housing Project at 87-89 Tweed Coast Road, Hastings Point NSW
RAC	Residential Aged Care home
SSDA	State Significant Development Application
Subject Site	Part of Lot 1 DP786570/ 87-89 Tweed Coast Road Hastings Point NSW



1 INTRODUCTION

1.1 Project Background

Heritage Management & Planning Pty Ltd has been commissioned by TriCare (Hastings) Limited to undertake a Aboriginal Cultural Heritage Assessment Report (ACHAR) to support the proposed Seniors Housing Project at 87-89 Tweed Coast Road Hastings Point NSW, (the Subject Site) (**Figure 1**).

TriCare is one of the leading seniors living providers in Australia. Proudly family-owned and operated, TriCare has been providing residential aged care, supported living and independent living options for older Australians for over 50 years. TriCare currently operates 24 aged care residences and retirement communities across Queensland, New South Wales and Victoria. TriCare's purpose is to empower and support seniors by providing vibrant retirement communities and residential aged care solutions to enable them to live their best lives. This is extended through offering services to promote health, wellbeing and connection, in welcoming settings.

The Seniors Housing Project will be assessed as a State Significant Development Application (SSDA)- the environmental assessment requirements relating to Aboriginal cultural heritage are provided below:

19. Aboriginal Cultural Heritage

Provide an Aboriginal Cultural Heritage Assessment Report prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts for any Aboriginal cultural heritage values on the site.

The ACHAR has been commissioned to consider the potential impacts of the proposed Seniors Housing Project on Aboriginal objects and cultural values, including potential impacts to the cultural landscape.

1.2 Background to the Proposal

A Senior Housing development was approved on the subject land in May 2007 by Tweed Shire Council. Stage 1 of the development was developed in 2009 by another provider. Stage 1 incorporates the 91 independent living units across three buildings with basement car parks.

TriCare subsequently purchased the site in 2011 and currently operate the existing development. The remaining stages, which comprised 94 supported living units and 67 residential aged care beds across 4 buildings, has never been built. Nevertheless, the consent remains valid. TriCare has reviewed the balance of the approved development and concluded that the design no longer responds to the contemporary vision of senior living needs and requirements - including the quality of accommodation, allowance for lifestyle amenity, provision of greater passive and active communal spaces and the support and encouragement of age in place principles. Accordingly, TriCare has elected to review the balance of the master plan and embark on a new delivery outcome for the balance stages of the seniors housing community.

1.3 Description of the Subject Site

The TriCare Hastings Point development site is located at 87-89 Tweed Coast Road, Hastings Point (Lot 1 DP 786570). The 37, 390m² site is located at the southern end of the Hastings Point. Hastings Point is predominantly a low-scale coastal settlement providing a range of recreational, holiday and residential opportunities. The site is surrounded by public open space and environmental land including Cudgera Creek to the west, Cudgera Beach and dunal foreshore to the east, and the Pottsville Environmental Park to the north and south. An existing Service Station adjoins the site's south-east.

1.4 Project Brief & Methodology

In accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010A) (CoPAI) and the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011) the methods employed in this assessment include:

- A description of the proposal to understand the potential impacts from construction and ground works
- a search of relevant Aboriginal heritage registers
- a review of environmental information relevant to the assessment
- a review of relevant archaeological and cultural heritage assessments
- development of an archaeological predictive model
- consultation with representatives of the Aboriginal community
- archaeological investigations, including:
 - i. a summary of the assessment methodology
 - ii. a description of results of the assessment including statements on the local and regional significance of archaeological sites identified within the Subject Site, and
 - iii. statements on the adequacy of the assessment and the requirement for additional archaeological excavation
- an assessment of the cultural values (Social, Historic, Scientific, Aesthetic) and a Statement of Significance for the Subject Site
- an impact assessment to clearly describe the potential harm to Aboriginal cultural heritage values, including consideration of Ecological Sustainable Development (ESD) principles (precautionary principle and principle of intergenerational equity)
- an outline of measures to mitigate the impacts of the proposed masterplan community, and
- management recommendations to inform future assessments, including any conditions/management recommendations to be incorporated into future Development Applications.

1.5 Report Authorship

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



1.6 Description of the Proposal

The TriCare Hastings Point development proposes a 47-bed residential aged care facility, that will be supported by a range of other services, that will form an extension of the existing Senior Housing community operated by Tricare at the site (**Figure 3**). Specifically, the proposal includes:

- A 47 place RAC (Building D) comprising:
 - i. individual private rooms with ensuite facilities;
 - ii. shared dining, lounge and sitting rooms;
 - iii. café;
 - iv. kitchen;
 - v. serveries;
 - vi. nurses stations;
 - vii. offices;
 - viii. staff room and facilities;
 - ix. waste room; and
 - x. loading bay.
- 51 ILUs split across 3 buildings, including:
 - i. 24 ILUs in Building E
 - ii. 18 ILUs in Building F
 - iii. 9 ILUs in Building G.

Complementing the ILUs and RAC, the development offers a range of communal facilities for entertainment, health, active and passive recreation. These facilities include:

- Bowling Green and pavilion with bowls store, amenities, kitchen and covered seating area;
- Indoor swimming pool and spa, with amenities and viewing area;
- Perimeter walking trail; and
- Landscaped gardens.

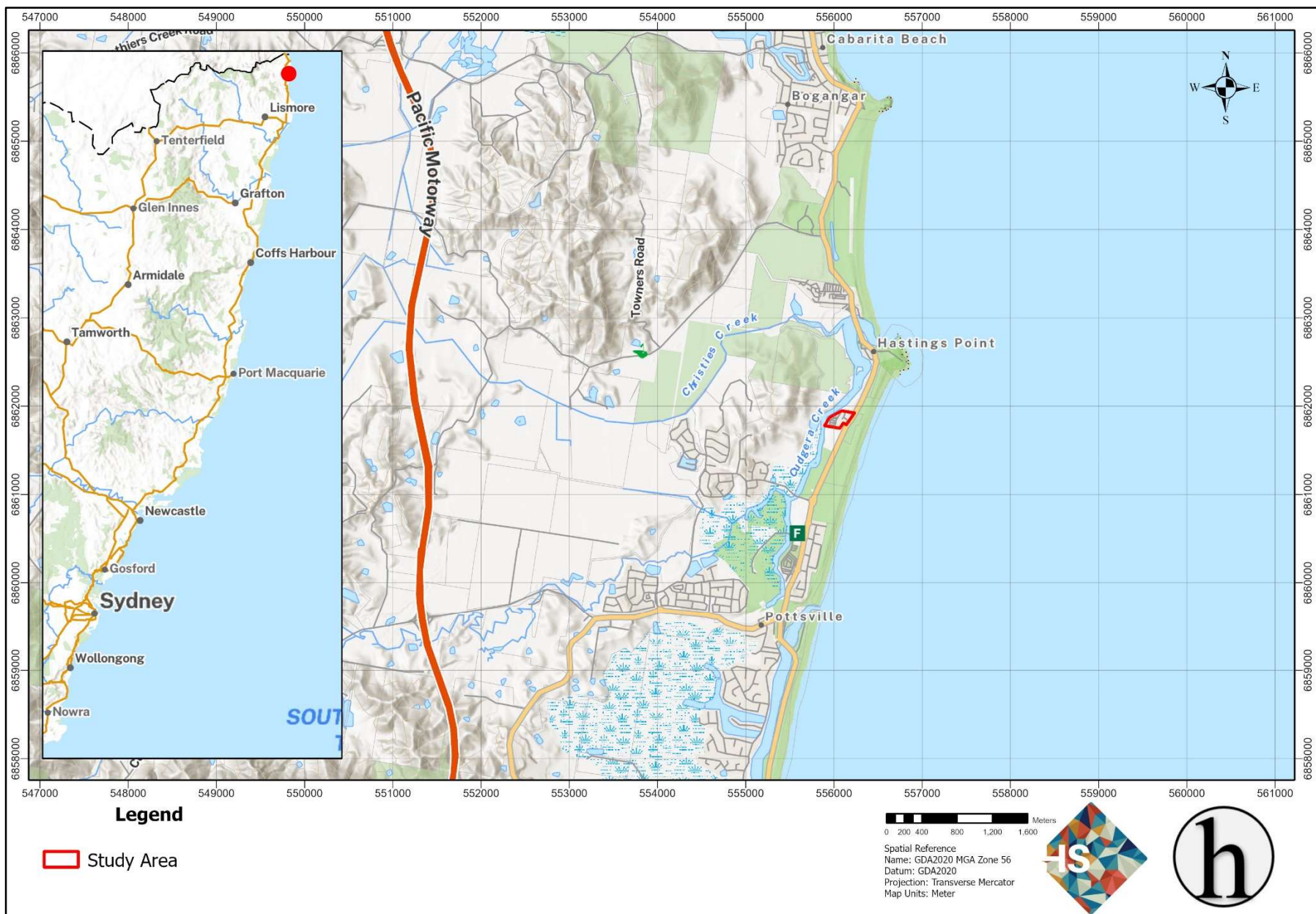


Figure 1: Tricare Hastings Point - General location

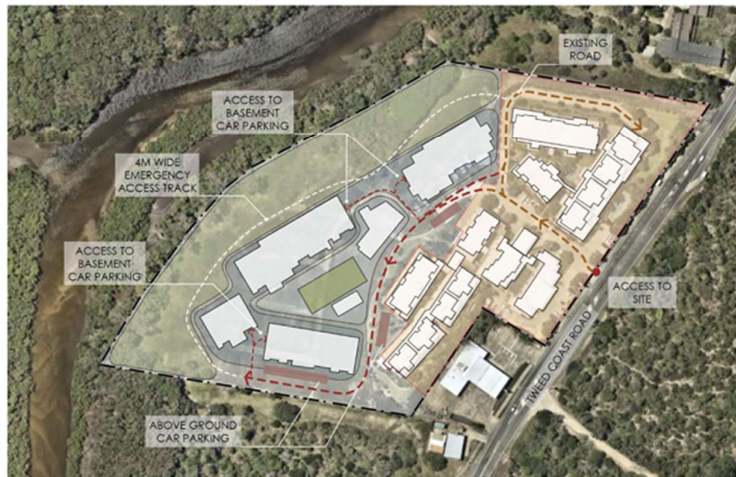
MASTERPLAN CONSIDERATIONS



PRECINCTS



SUB-PRECINCTS



VEHICULAR CIRCULATION



PEDESTRIAN CIRCULATION

Arqus
DESIGN

Integrated perspective

Arqus Design Pty Ltd Level 2, 15 Mall Street
 ABN 64 126 616 363 Fortitude Valley, Qld 4026
 PO Box 2465
 New Farm, Qld 4005

Registration
 Nominated Architect Scott Peabody
 QLD 2444
 NSW 3038
 VIC 600111 (Arqus Design 600035)
 email@arqudesign.com.au Phone 07 3250 0880
 www.arqudesign.com.au Fax 07 3250 0880

Arqus Design acknowledges the Traditional Owners of Country on which we live, work and design and pay our respects to their Elders, past and present.

NOTES

Contractors are to verify all dimensions on site before commencing any work or producing shop drawings.

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DATE	REVISION	ISSUE
24.07.22	DRAFT DA PACKAGE	A
24.08.16	DRAFT DA PACKAGE	B
24.10.09	DA PACKAGE	C

CLIENT



PROJECT

TRICARE HASTINGS POINT
 87 TWEED COAST RD, HASTINGS
 POINT 2489, NSW

COUNTRY: BUNDJALUNG

DRAWING

**MASTERPLAN DESIGN
 CONSIDERATIONS**

JOB NUMBER: 23-0025 DESIGN: SP DRAWN: KF CHECKED: SP

SCALE: @A1 DATE CREATED: 01/11/2023 @A3 NORTH

DRAWING NUMBER: **DA-1-11** ISSUE: **C**

ISSUED FOR: **C**

Figure 3: Tricare Hastings Point – Masterplan site considerations

2 LEGISLATIVE AND PLANNING CONTEXT

2.1 Environmental Planning and Assessment Act (1979)

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

Part 3- Planning instruments which include Local Environment Plans (LEPs), Development Control Plans (DCPs) and other strategic planning controls.

Part 4- Development assessment and consent controls including approvals by local Councils and Regional Planning Panels.

Part 5- Self assessment and approvals by a government agencies, or Determining Authorities, for infrastructure and environmental proposals, and for the approval of State Significant Infrastructure by the Planning Minister.

Under the EP&A Act, development consent for the proposal is being sought through the State Significant Development (SSD) pathway.

2.2 National Parks and Wildlife Act 1974 (NSW) and Regulations 2019 (NSW)

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

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

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

but does not include any act or omission that—

(e) desecrates the object or place, or

(f) is trivial or negligible, or

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

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

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

The requirement for an AHIP is switched off by section 4.41 of the EP&A Act is being assessed as a SSDA (see above). The effect of Section 4.41 is that compliance with the approval conditions, including documents issued as part of the approval and any management and construction plans that form part of the approval, is taken as a defense against prosecution in the event of an allegation of harm to Aboriginal objects that might occur during construction and operation.

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

The assessment has been undertaken in substantial accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW* (DECCW 2010A) (CoPAI). The CoPAI provides the following statement on the application of the Code:

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

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



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

Requirement 14 of the CoPAI sets out the requirement for archaeological excavation as part of the ACHA process (DECCW 2010A:24):

Archaeological test excavation will be necessary when (regardless of whether or not there are objects present on the ground surface) it can be demonstrated through Requirements 1, 2, 3, 4, and 5 that sub-surface Aboriginal objects with potential conservation value have a high probability of being present in an area, and the area cannot be substantially avoided by the proposed activity.

The CoPAI does not clearly outline the criteria for 'conservation value' or 'high probability', however for the purposes of the assessment this would include site types which are considered regionally rare, endangered or of particular significance to the Aboriginal community and would likely occur within the area of land subject to investigation. Compliance with the CoPAI is a minimum technical requirement for an ACHAR. The technical report is provided to determine areas that should be excluded from future development or areas which require additional archaeological excavation and consultation with the Aboriginal community as a mitigation measure to ensure that the proposal does not result in a significant impact to the Aboriginal cultural landscape. Based on the findings of the study technical information about archaeological values has been incorporated into this ACHAR- in response to the history of the Subject Site the primary focus of the ACHAR is cultural values and impacts to the cultural landscape.

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

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

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

The investigation and assessment of Aboriginal cultural heritage is undertaken to explore the harm of a proposed activity on Aboriginal objects and declared Aboriginal places and to clearly set out



which impacts are avoidable and which are not. Harm to significant Aboriginal objects and declared Aboriginal places should always be avoided wherever possible. Where harm to Aboriginal objects and declared Aboriginal places cannot be avoided, proposals that reduce the extent and severity of harm to significant Aboriginal objects and declared Aboriginal places should be developed.

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

Compliance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH 2011) is a minimum requirement for a project subject to a SSDA.

3 ENVIRONMENTAL REVIEW

3.1 Environmental Context

The Subject Site is located on the eastern bank of Cudgera Creek, approximately 950 metres upstream of the Hasting Point inlet and Hastings Point Headland. The Subject Site has no significant topography but has a slight westerly aspect, sloping towards the creek (**Figure 4**). The lands east of the Subject Site comprise the hind dune of North Pottsville/Cudgera Beach. Cudgera Creek forms from a large swamp land at Pottsville and the Mooball / Burringbar Range to the west.

The proposed Seniors Housing project is mapped within the 'Cobaki Variant A' soil landscape (espade.environment.nsw.gov.au) which comprises 'level, extensive marine plains and estuarine in-fills.' (**Figure 5**). The geological model for the Cobaki Variant A soil landscape includes "Quaternary estuarine alluvium consisting of Holocene and Pleistocene in-fill materials—clay, silt, sand and gravel occur, but organic materials dominate the surface".

The vegetation model provided for the Cobaki soil landscape is.

Extensively cleared closed-swamp complex and areas of grass, sedge and rushland. Present species include stands of broad-leaved paperbark (*Melaleuca quinquenervia*) and swamp oak (*Casuarina glauca*). Coastwattle (*Acacia longifolia* var. *sophorae*) may occur and river mangrove (*Aegiceras corniculatum*), grey mangrove (*Avicennia marina* var. *australisica*) and black mangrove (*Bruguiera gymnorhiza*) line tidal channels. Main communities within this soil landscape are closed-grassland and open-rushland. Dominant species are couch (*Cynodon dactylon*) and foxtail (*Alopecurus myosuroides*). Rushes and sedges include *Juncus* spp., soft twig-rush (*Baumea rubiginosa*), giant sedge (*Lepironia articulata*) and common rush (*Juncus usitatus*).

3.2 Disturbance History

Review of historic aerials was undertaken to understand the potential impact of historic land use on Aboriginal objects, with specific consideration of impacts to topsoils with the potential to contain Aboriginal archaeological sites.

1961- the Subject Site has been subject to sand mining or significant clearing of vegetation for sand extraction (**Figure 6**)

1970- the Subject Site has been subject to remediation and revegetation (**Figure 7**)

1978- two small structures have been constructed to the east of the Subject Site (**Figure 8**), and

1991- The Subject Site comprises a holiday park or relocatable home village (**Figure 9**).

Based on the review of historical aerial photos it is reasonable to proceed with the assessment on the basis that the Subject Site has been subject to significance ground disturbance as defined by the Due Diligence regulations, being disturbance that is "clear and observable". The nature of this ground disturbance would significantly reduce the likelihood that Aboriginal archaeological sites will be retained in-situ within the Subject Site.

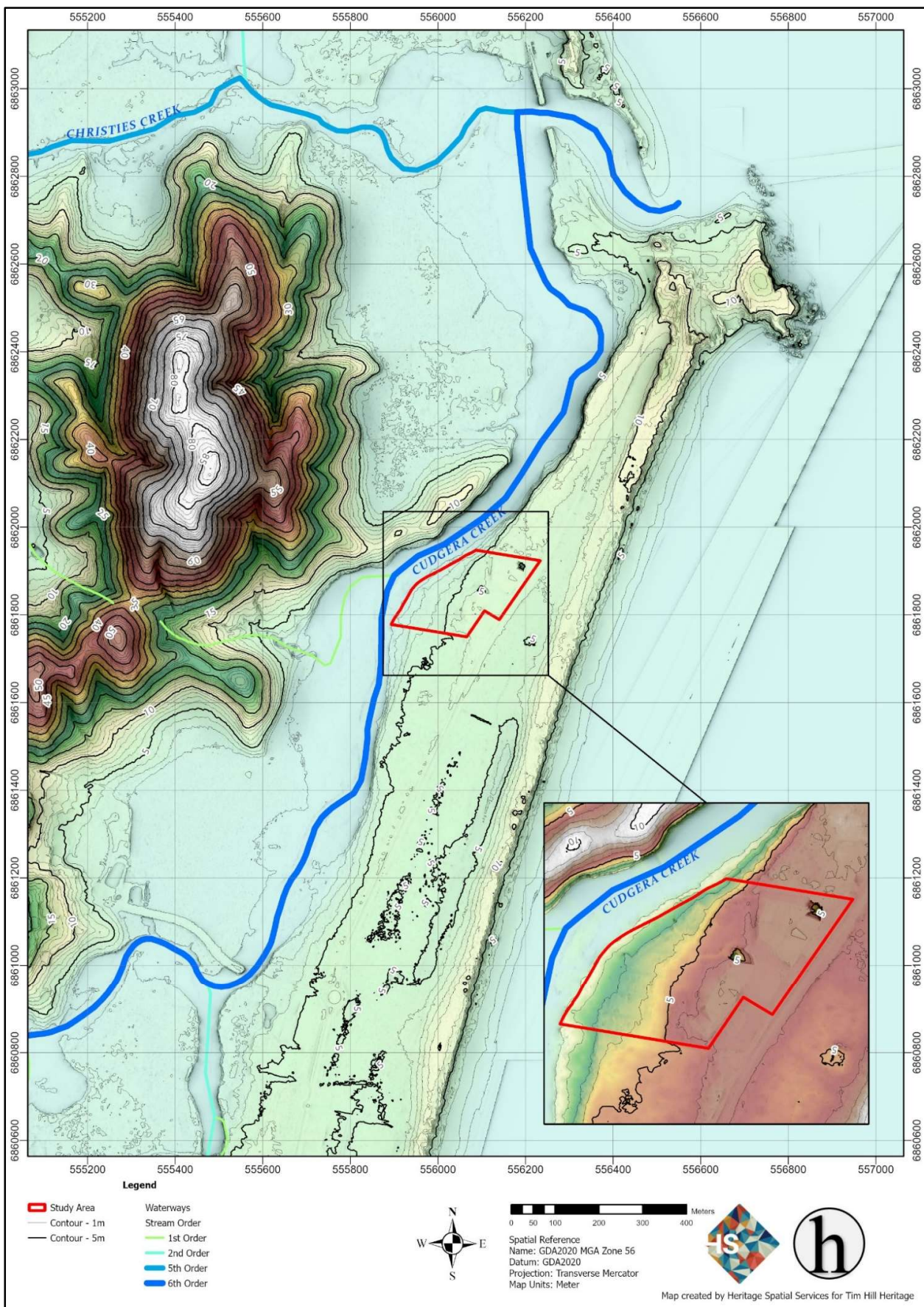


Figure 4: Tricare Hastings Point Seniors Housing Project: Hydrology and topography

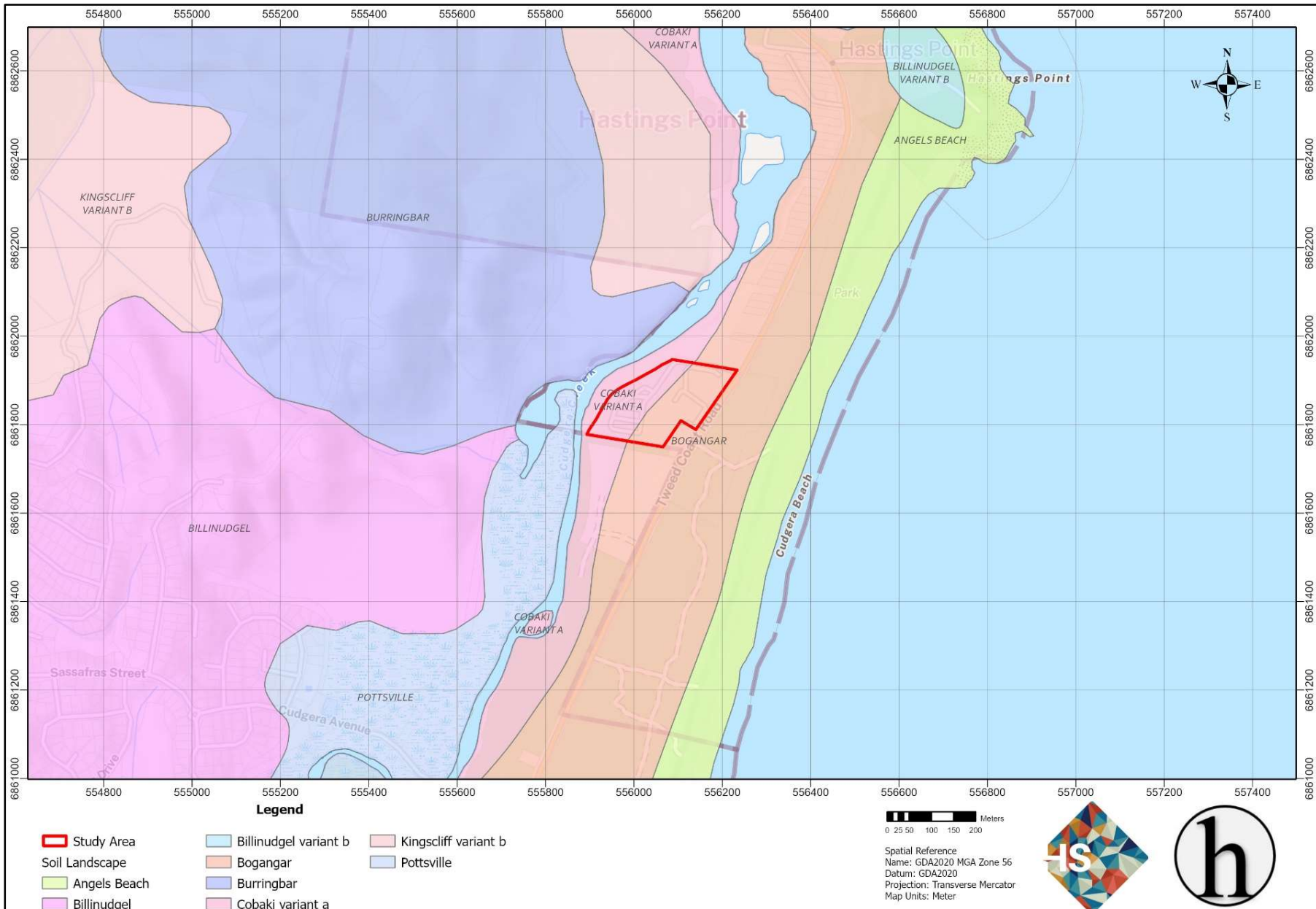


Figure 5: Tricare Hastings Point Seniors Housing Project: Soil landscapes (espade.environment.nsw.gov.au)



Figure 6: 1961 aerial photo (NSW Spatial collaboration portal)

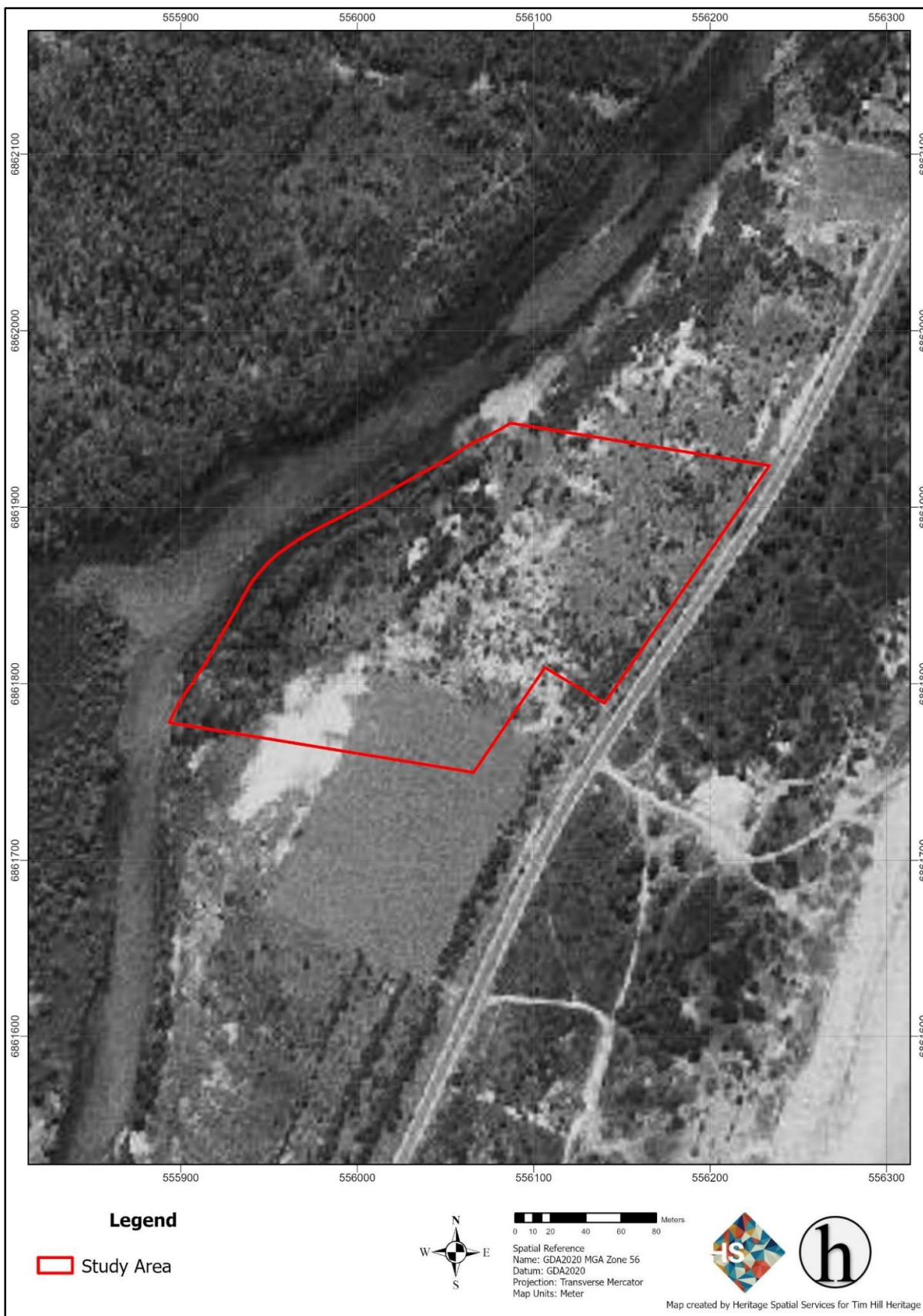


Figure 7: 1970 aerial photo (NSW Spatial collaboration portal)



Figure 8: 1978 aerial photo (NSW Spatial collaboration portal)



Figure 9: 1990 aerial photo (NSW Spatial collaboration portal)

4 ARCHAEOLOGICAL SYNTHESIS AND PREDICTIONS

4.1 Database search

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

A search (AHIMS #811387) was undertaken on 20 August 2023 for the area “Lat, Long From: 28.404, 153.4757 - Lat, Long To : -28.3285, 153.5993” (**Table 1** and **Figure 10**). No Aboriginal sites are located in the vicinity of the Subject Site- the main site complexes are on elevated ground at Hastings Point and Cudgera Creek inlet and the large hill/ ridge to the west of Cudgera Creek.

Table 1: Summary of AHIMS search results by site type.

Site Type	No.	%
Aboriginal Ceremony and Dreaming	3	9
Aboriginal Resource and Gathering	1	3
Artefact	14	40
Artefact, Modified Tree (Carved or Scarred)	1	3
Artefact, Modified Tree (Carved or Scarred), Ceremonial Ring (Stone or Earth), Water Hole	1	3
Artefact, Shell	1	3
Burial	2	6
Ceremonial Ring (Stone or Earth)	1	3
Fish Trap	1	3
Ochre Quarry	2	6
Restricted	1	3
Shell	3	9
Shell, Artefact, Aboriginal Resource and Gathering	1	3
Shell, Non-Human Bone and Organic Material, Artefact	1	3
Stone Arrangement	1	3
Stone Quarry	1	3
	35	100

The Subject Site is not identified as a place of known or predictive Aboriginal cultural heritage in the Tweed Shire Council Aboriginal Cultural Heritage Management Plan (2018) (**Figure 11**).

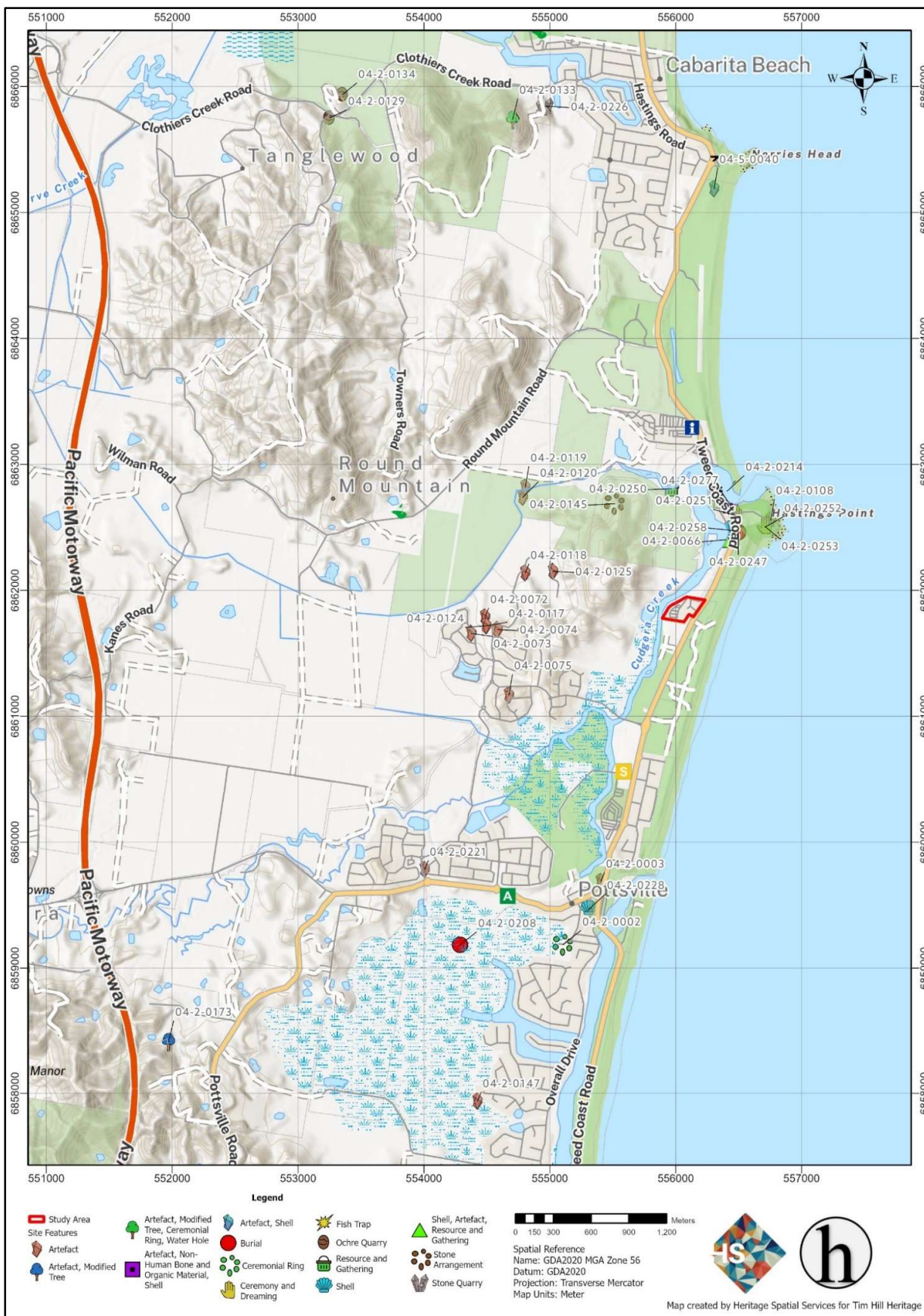


Figure 10: Tricare Hastings Point Seniors Housing Project- AHIM search results (#811387).

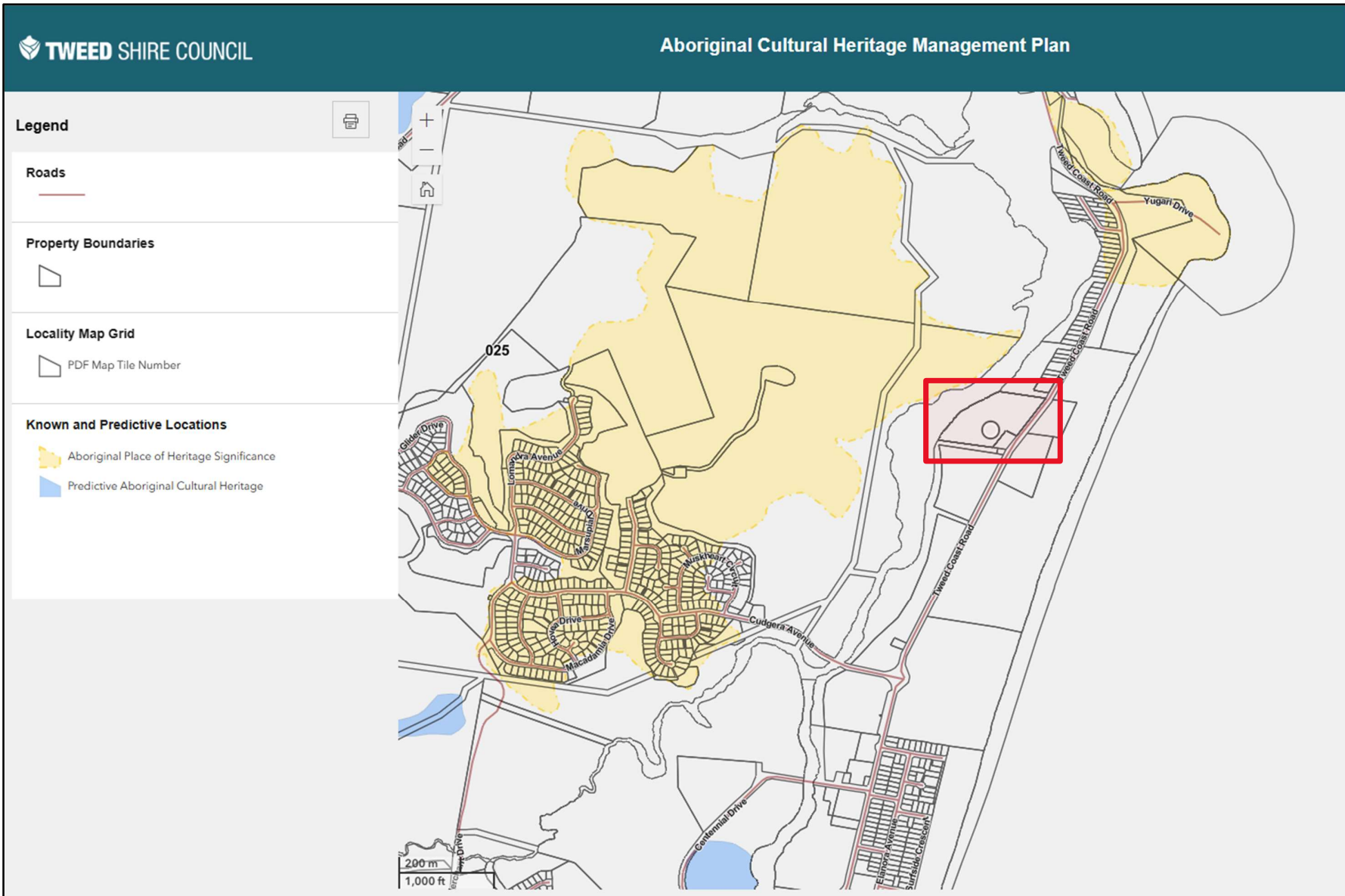


Figure 11: Tweed Shire Council Aboriginal Cultural Heritage Management Plan mapping

4.2 Ethnohistory

The Aboriginal people of the coastal Tweed-Brunswick Rivers were associated with a wider linguistic group, the Bunjalung, which was spoken with dialect differences between the Clarence and Logan Rivers and extending as far west as Tenterfield. Land belonged to clan groups whose boundaries had been established in mythology (Creamer 1984). Dialect groups composed of interlinked clan/family groups occupied distinct areas within the wider Bunjalung association (Crowley 1978). Curr provides some evidence for this model suggesting that dialects between the Albert River and Tweed River were closely related (Curr 1887:321). Tindale recognised a similar common language group extending north-south between Byron Bay and Southport and west to Murwillumbah, which he called Minjanbal (Tindale 1940:191). Tindale's Minjanbal language group possibly contained two land holding clans, the Kombemerri north of the Tweed River and the Coodjimbingurra south of the Tweed River extending along the coast to include Hastings Point.

Joshua Bray a postmaster, and 'Protector of Aborigines', defines the Coodjimbingurra territory as, '... the part along the coast between the Tweed and Brunswick rivers, about ten miles back from the coast....' (Bray 1901:9). The word for Bray's 'tribe' is ku-ging corrupted to modern Cudgen. 'This was the place where the blacks get the red raddle or pigment to paint themselves with when going fighting or to corroboree...' (Bray 1901:10). The hills where the 'red raddle' was procured are immediately to the west of the Kingscliff and north of Hastings Point.

Population estimates for the Tweed Valley and coast have been based upon general reports to government authorities and on estimates from specific sightings. In the mid-1800's Commissioner of Crown Lands Simpson, estimated the population between Point Danger and Fraser Island at not less than 5000 (Simpson 1844:484-486). Bray, from near his residence at Kynnumboon observed 600 people camped on the Wollumbin Plain west of Murwillumbah in the 1860's (Bray 1901). A party of 200 men armed with spears had been observed by John Oxley's party on Fingal Head in 1823 (Uniacke 1825:40). Pierce suggested that this gathering of men would indicate a population of about 500 for the Tweed District and a population density between the Tweed and Brunswick Rivers and inland for some miles, '... of about three per square mile (Pierce 1971:13).

Bray records that, '... the Coodjimbingurra tribe inhabiting the coast, used to mix very much with the Ballina Richmond River Blacks...' (Bray 1901: 9). Bray also observed that for ceremonial occasions Tweed people would travel up to forty miles (Bray 1902:8). Here Bray was referring to a Bora ceremony west of Mount Warning. Movement within the Coodjimbingurra territory is most likely to have been in response to seasonal availability of foods (Piper 1976:74). A number of observers refer to movement from the coastal plain to foothills during wet seasons on the Richmond/Tweed (Moehead: n.d.; Hanna 1946). During the wet season on Moreton Bay, Backhouse observed, '... the Aborigines resort to elevated situations contiguous to those parts of the coast abounding with oysters. In these situations their huts are said to be large enough to stand up in' (Backhouse 1843: 274). Jones (1896) stated that the Tweed coastal group moved to the shoreline during the mullet season. It appears that in the normal course of food foraging, the boundaries of the local

land holding groups were clearly defined and crossed under threat of death. For agreed purposes it was possible to cross boundaries between adjoining groups, such as the movement to the Bunya Mountains, every third year so 'Under a sort of 'Truce of God'....For the blacks went through each other territories unharmed...' (Bundock 1898 in McBryde 1978:265).

An early account of the Coodjimbingurra people is provided by the diary of Uniaki, who was a member of the expedition led by John Oxley in 1823 (in Steel 1987:48):

On the right bank of the river were standing one man and several women and children, all perfectly naked. They did not appear so timid as the Indians usually are, but remained quietly while we landed to search for fresh water, the river being still brackish. The man was curiously scarified all over his body, the flesh being raised as thick as a finger all over his breasts. He talked very loudly for some time, using much gesticulation, and frequently pointing to the other side of the river, where we had observed a number of native huts. We could not however obtain from him any information with regard to the object of our search; so after giving him some biscuit, which he tasted and instantly spat out again, we left him, and as it was now late, proceeded towards the vessel, resolving the next day to return and follow the river as far as circumstances would allow. We saw no weapons of any description among these people, with the exception of a stone hatchet hanging from the back of one of the women, which was of wretchedly crude formation...In the mean time a number of natives, amounting to about 200, collected on the shore opposite the vessel, and we could perceive with the glass that they all had spears. They continued watching us till they saw the square-sail hoisted and the vessel underway, when they set up a loud shout, and continued dancing and shouting while we were within hearing."

4.3 Archaeological investigations of the local area

4.3.1 Piper (1976)

Piper (1976) recorded two stone quarrying sites in the Hastings Point area. A stone quarry (#04-02-0145) is located on the northern spur of the high ground immediately west of the Cudgera Creek estuary. The site is on slopes falling to Christies Creek to the north of the Subject Site. The site consists of large volumes of split feldspathic sandstone forming a talus slope. Large flakes are evident. A large core scraper was observed and photographed from the site (Piper 1976:94).

The second site is located on Hastings Point:

A knapping floor is evident on the eastern face of Hastings Point (# 04 - 02 - 0108). The worked material is c.25 centimetres below the surface and extends for approximately 80m north to south. The material is flaked feldspathic sandstone, which may have originated from the Hastings Point quarry 1.5km to the west or from boulders at the base of the low headland (Piper 1976:115-118).

4.3.2 Collins (1993)

The Koala Beach Estate is located on the ridges and slopes at the southern end of the high ground that forms west of Cudgera Creek. Collins (1993) located eight sites on the slopes and flats in the Christies Creek watershed- southwest of the Subject Site. Four open campsites (#04-02-0072 to 04-02-0075) and four isolated artefacts (#04-02-0117 to 04-02-0120) were recorded. Of the 42 artefacts recorded, 23 were classed as flaked pieces, 18 were flakes and one a core. The materials were predominantly chalcedony/agate with siltstone, fine grained volcanics, chert and quartz (Collins 1993:26). Collins observed, that "... it was likely that use of the area centred on exploitation of multi resources including both fresh and marine aquatic foods..." Collins concluded with supporting statements by Lilley (1993) and Piper (1976:173) that "... although no seasonal indicators were evident, that the use of the low ridges and spurs of the coastal foothills complexes may have been used."

4.3.3 Piper (2000)

An archaeological assessment by Piper (2000) of 8.3 ha of floodplain adjoining the Gales land holding at Cudgen Precinct, located an artefact scatter/open campsite (#04-2-109). The site consisted of a low-density (3.6 artefacts/hectare) scatter of 30 stone artefacts. These consisted mainly of flaked pieces (41%), scrapers (4%), cores (8%), modified flakes (12%) and unmodified primary flakes (29%). Chert and chalcedony comprised 62% of the stone types used with 7% - 10% of agate, jasper, quartz and quartzite. The site was a ploughed paddock previously used for sugar cane and tea tree cultivation (Piper 2000:29-30). It was considered the site did have a 'uniqueness' from the perspective that it was the only open campsite (artefact scatter) recorded on the alluvial soils of the floodplain, as opposed to the slightly elevated sand rises which merge with the floodplain soils in this locality.

However, the high probability the site had been highly disturbed and therefore of limited scientific value led to a recommendation that a Consent to Destroy be sought.

4.3.4 RPS (2017, 2019)

RPS undertook a due diligence assessment for a portion of the Dunloe Park North Urban Release Area, Pottsville, NSW, to the north west of the Subject Site. The results of an AHIMS search and visual inspection indicated that Aboriginal objects were not present. This assessment identified that the whole of the urban release area had been heavily farmed and the landscape modified over successive generations- there was little to no evidence of unmodified or undisturbed landforms. The study concluded:

Quarrying activity has eradicated much of the original landscape and vegetation where it has been carried out and elsewhere the property has been cleared and drained. It was considered to be highly unlikely to contain potential Aboriginal Heritage and that harm to Aboriginal objects remote. Topsoils erosions as a result of the vegetation clearance reduced the likelihood of insitu Aboriginal cultural objects or sites considerably.

... the absence of permanent freshwater may have reduced the likelihood of permanent occupation in the project area, and this may have been limited to higher ground such as ridgelines, particularly in wet seasons. The ridgelines would also have presented a pathway to travel through the landscape.

A subsequent investigation in 2019 confirmed the overall low potential of the area to contain Aboriginal sites and verified the location of sites previously recorded around the area. The 2019 study (RPS 2019:19) made the following general statement on the potential for Aboriginal sites in sub-coastal swamps and low hills where freshwater was not readily available:

A review of the AHIMS data and previous archaeological work in the area suggest Aboriginal populations certainly traversed and gathered resources from the Project Area vicinity, but, were unlikely to have spent extending periods of time, or repeatedly occupied this location given the absence of permanent potable water sources, wetland density and frequent inundation of lower lying areas.

The nature of farming activities and sand quarrying has greatly disturbed the topsoil profiles and thereby considerably reducing the potential for insitu Aboriginal objects and sites. Where some soil profiles remain, such as on undulations or elevations, the potential for subsurface Aboriginal cultural objects may be present.

4.3.5 *Everick Heritage Consultants (2010)*

The cultural heritage assessment of the Kingscliff Resort, Kingscliff was completed prior to the development of ecotourism facilities to the north of the Subject Site. It reviewed archaeological findings in a local context, noting the presence of artefact scatters in and around the Cudgen and Kingscliff coastal streams and adjacent lowlands and made predictive statements regarding site types for the area. The study found that earlier sand mining in the area had caused extensive disturbance to any potential insitu archaeological deposits in the interdunal system and as a result no Aboriginal sites, or areas of archaeological potential were identified. Ground surface visibility across the area was noted as generally poor.

4.4 Regional archaeological studies

4.4.1 *McBryde (1974) and Coleman (1982)*

McBryde (1974) proposes that groups ranged between the seacoast and foothills of the coastal ranges on a seasonal basis (i.e. McBryde 1974) utilising the immediate coast and main rivers as the focus of occupation. Early sources support this view to some extent as there are records describing the movement of inland groups of the Clarence River to the coast during winter. Central to the model was the analysis of archaeological sites on the Clarence River and Wombah and Seelands. The Seelands rock shelter, located above the estuary, contained an occupation phase from circa 4500 BC - 1600 AD (McBryde 1974). The analysis of plant remains suggested a vegetation mosaic of open dry sclerophyll on elevated ground with corridors of rainforest along water courses (McBryde 1974:327). Analysis of faunal remains for the upper levels of the site indicated wallabies, possums and bandicoots provided the greater part of the meat diet (Wakefield in McBryde 1974: 360). Other animal remains included echidna, native cat, kangaroo, fruit bat, mussels, tortoise and catfish. McBryde noted a number of clear distinctions between the riverine Seelands site and the coastal midden at Wombah on the Clarence estuary. The Seelands artefact assemblage is more diverse, greater in quantity with strong evidence for the manufacture and maintenance of stone tools which

is the opposite of the middens at Wombah which typically demonstrated a narrow diet with very small reliance of stone tool technology. The biological material at Seelands reflects a broadbased economy exploitive of a number of microenvironments, in contrast to the narrow economic base at on the estuary which focused on the expansive coastal and estuarine resource base. The archaeological evidence suggested contact between the riverine site and the estuary at both sites and evidence for winter occupation in the presence of emu eggshell at Seelands, while a dependence on oysters at Wombah would suggest occupation in late spring or summer (McBryde 1974b: 8-9).

Coleman (1982) proposes an alternate model where it is suggested that movement of coastal people was not frequent, and that semi sedentary groups moved north and south within the coastal plain rather than to the upper rivers (Coleman 1982). The model is based on reports of numbers of small villages composed of dome shaped weatherproof huts between the mid- NSW coast and Moreton Bay. Flinders described a small group of huts in the vicinity of Yamba in 1799, and Perry described two villages on the banks of the lower Clarence in 1839 (McBryde 1974:9). Similar sightings were reported by Rous on the Richmond (McBryde 1974), Oxley on the Tweed (Piper 1976) and in Moreton Bay (Hall 1982). The 'solid' construction methods described for these huts seem to suggest the occupation of a base camp for periods of months rather than a constant wide-ranging pattern of low-level land use.

4.4.2 Godwin (1990a and 1990b)

Godwin (1990a and 1990b) argues that the 'models' proposed by McBryde and Coleman are not supported by the archaeological record and that local conditions dictated exploitation strategies on the north coast of NSW. In this model:

Amongst coastal groups proper there was no movement from the coast back into the sub-coastal river valleys and foothills. These people were semi-sedentary and lived close to the coast the whole year round. Movement associated with the subsistence round involved travelling only short distances away from the littoral. There were instances of long-distance travel associated with ceremonial gatherings. However, such movement was generally parallel to the coast...

Sub-coastal groups journeyed to the coast, but only in small numbers: there was not the large-scale migration of people posited by McBryde. The data suggests that this took place throughout the year and could have been for both ritual and secular reasons. Groups also journeyed through the "Falls" country throughout the year. There are also reports of movement in a north-south direction along the sub-coastal strip from river valley to river valley, and from the sub-coastal zone to the tablelands which appears to have been associated with ceremonial gatherings. These ranged from clan-sized gatherings through to inter-tribal meetings (Godwin 1999:122, 123).

4.4.3 NSW Rainforests (Byrne 1987)

Byrne (1987) developed a state-wide land use model specifically around the use and occupation of rainforests. Byrne distinguishes between the 'Lowland' and 'Upland' rainforests and proposes:

...The lowland rainforests were situated within what might be termed the core areas of the coastal lowland tribes. The North Coast of New South Wales supported some of the heaviest populations of

Aborigines in the prehistoric Australia. The foci of settlement of these tribes were the immediate coastal strip, the estuaries and valleys of the major rivers. The key attribute of the lowland rainforests was their proximity to the main areas of settlement and, hence, the accessibility of their resources...Most of these rainforests could be exploited from bases in other and neighbouring environments. It is likely that major campsites were located close to the productive margins of these rainforests. Campsites may also have been situated in clearings within rainforests where they acted as bases for the exploitation of core areas of extensive forests and as staging camps for travel through such forests... (Byrne 1987:54-55)

4.4.4 Stubbs (2010)

Based on an extensive literature review from the Richmond and Tweed Valleys, Stubbs (2010) proposed that within the former Big Scrub and riverine context of the Lismore area the natural clearings known to Europeans as “Grasses”, that is grass or sedge lands otherwise surrounded by rainforest, were permanent Aboriginal campsites.

A remark by Flick (c.1935) that ‘a piece of clear, naturally grassed land... encircled by overhanging trees’ would be chosen as the site of great ‘marriage feasts’ is one of very few known references. Stitt (1953) also noted that the ‘grasses’ tended to be used as Aboriginal ceremonial grounds. The fact that so many of these features had Aboriginal names, as recorded by the early surveyors, also suggests that they were of importance to the Aboriginal people (see, for example, Mitchell 1978, pp. 129–35). Here it is notable that the hilltop area near Lismore which Ramsay (1865) referred to as First Grass has an Aboriginal name—Goonellabah—which is said to mean ‘a grassy hill surrounded by forest’

The locations of the grasses were well known to Aboriginal and European people in the 19th century (Stubbs 2010), though given the extent of modification of the landscape associated with European settlement their locations can only be speculated today. However, the few grasses are mapped along the coast, which indicates that the use and occupation of the Big-Scrub was undertaken from more open coastal dunes and estuaries.

4.4.5 Williams et al (2015)

Williams et al (2015) propose a continental-scale model of Holocene Australian hunter-gatherer demography and mobility using radiocarbon data and geospatial techniques. Results show a delayed settlement of much of Australia following the termination of the late Pleistocene until after 9,000 years ago. The onset of the Holocene climatic optimum (9-6ka) coincides with rapid expansion, growth and establishment of regional populations across ~75% of Australia, including much of the arid zone. The authors argue longer patch residence times were possible at the end of the optimum, resulting in a shift to more sedentary lifestyles and establishment of low-level food production in some parts of the continent. The onset of El Niño - Southern Oscillation (ENSO; 4.5-2ka) restricted low-level food production, and resulted in population fragmentation, abandonment of marginal areas, and reduction in ranging territory. Climate amelioration brought about by more pervasive La Niña conditions (post-2ka), resulted in an intensification of the mobility strategies and



technological innovations that were developed in the early- to mid-Holocene. These changes resulted in population expansion and utilization of the entire continent. It is proposed that it was under these demographically packed conditions that the complex social and religious societies observed at colonial contact were formed.

4.5 Predictive model

A predictive model can be used to provide a preliminary indication of the archaeological 'character' (or the type and frequency of archaeological material) that could be expected to be associated with landscape features. This, considered with an analysis of landform and geomorphology specific to a Subject Site, can also guide targeted field investigation. For the purposes of the ACHA the predictive model for the Grafton Base Hospital is summarised below:

- the Subject Site is located on the banks of Cudgera Creek which would have comprised a mix of mangrove forest and heathland- the expected use of this area would be predominately for resource collection along the creek
- the most common archaeological sites on the coastal plain are stone artefact scatters and shell middens- it is expected that shell middens would be the most likely type of site to occur within the Subject Site
- it is expected that the main occupation sites would be located on the higher ground near Hasting Point, which provides access to the inlet and rocky shelf resources, and along the low ridge and hill west of Cudgera Creek which would have provided access to rainforest resources
- due to the two historic ground disturbance events, being the sand mining/ stockpiling and civil works for a previously approved seniors housing project, the overall likelihood that Aboriginal sites will occur within the Subject Site is low, and
- the Tweed Shire has been subject to a major cultural landscape mapping project which has not identified intangible heritage within the Subject Site.

5 ABORIGINAL COMMUNITY CONSULTATION

5.1 Aboriginal Cultural Heritage Consultation Requirements for Proponents (DECCW 2010C)

The *Aboriginal cultural heritage consultation requirement for proponents* (DECCW 2010C) (ACHCRP) provides a guide for appropriate consultation with the Aboriginal community to inform the ACHAR. The overview of the ACHCRP makes the following comment on the role of consultation in the cultural heritage assessment process (DECCW 2010C:iii):

The NPW Act provides specific protection for Aboriginal objects and Aboriginal places by providing offences for unauthorised harm. The NPW Act establishes the Director General of DECCW as the decision-maker for Aboriginal heritage impact permit (AHIP) applications. DECCW requires the effective consultation with Aboriginal people as a fundamental component of the AHIP assessment process and acknowledges that:

- Aboriginal people should have the right to maintain culture, language, knowledge and identity
- Aboriginal people should have the right to directly participate in matters that may affect their heritage
- Aboriginal people are the primary determinants of the cultural significance of their heritage.

This document focuses on the requirements for consultation with Aboriginal people as part of the heritage assessment process:

- to determine potential harm on Aboriginal cultural heritage from proposed activities
- that informs decision making for any application for an AHIP where it is determined harm cannot be avoided.

Section 60 (9) of the National Parks and Wildlife Regulation (2019) makes the following comment on the application of the ACHCRP in the assessment process:

An application for an Aboriginal heritage impact permit is not invalid merely because the applicant for the permit failed to comply with any one or more of the requirements set out in this clause. *Note. Under section 90K(1)(g) of the Act, the Chief Executive, in making a decision in relation to an Aboriginal heritage impact permit, must consider whether any consultation by the applicant with Aboriginal people regarding the Aboriginal objects or Aboriginal place that are the subject of the permit substantially complied with any requirements for consultation set out in the regulations.*

A key consideration is that any activity which has the potential to harm Aboriginal objects, whether is authorised an AHIP or a Code of Practice, must include a process of consultation with the Aboriginal community to understand the values of the place and site that cannot be assessed by standard archaeological methods, including the spiritual, cultural and historic significance in the Aboriginal cultural landscape of which the site forms a part.

5.2 Summary of Aboriginal community consultation

The following summarises the Aboriginal community consultation undertaken prior for the ACHAR to inform the impact assessment (**Table 2**):

Table 2: Aboriginal community consultation summary

Date	Stakeholder	Method	Comment
7/8/2023	Heritage NSW North Coast Local Land Services Clarence Valley Council NSW Aboriginal Land Council Tweed Byron LALC NTSCorp Native Title Vision database search	Email	Request for list of known Aboriginal stakeholders in the Tweed LGA
15/8/2023	Tweed Byron LALC (Maurice Gannon)	Email	Registration as a RAP for the ACHA
23/8/2023	Heritage NSW (Barry Gunther)	Email	Provision of a list of Aboriginal stakeholders in the Tweed LGA.
30/8/2023	Tweed Valley Weekly	Public Notice	Public notice w/ request for registration by 15 September 2023.
30/8/2023	AT Gamilaroi Cultural Consultancy Banjalang Aboriginal Corporation Baryugil Square Cooperative Society Ltd Bundjalung Elders Council Aboriginal Corporation Burabi Aboriginal Corporation Burra: Waj:Ad Cannowindra Tweed Byron Aged and Disabled Care Durahwa Training and Development Aboriginal Corporation Aunty Jackie McDonald Jason McDonald Minjunbal Cultural Muesum Rachel Cavanagh Thomas Dahlstrom Tweed Aboriginal Cooperative Society Girra Girra Murun Aboriginal Corporation Wingarra Wilay Aboriginal Corporation	Email/ Mail	Notification of the ACHAR and details of the registration process.
14/9/2023	Aunty Jackie McDonald and Paul Buxton	Email	Registration as a RAP for the ACHA
3/11/2023	Heritage NSW Tweed Byron LALC	Email	Notification of the RAPs: Aunty Jackie McDonald, Paul Buxton, and Tweed Byron LALC.
10/11/23	Aunty Jackie McDonald, Paul Buxton, and Tweed Byron LALC.	Email	Provision of the assessment methodology
24/11/2023	Aunty Jackie McDonald, Paul Buxton, and Tweed Byron LALC.	Onsite consultation meeting	

Date	Stakeholder	Method	Comment
10/11/2023	Aunty Jackie McDonald	Email	Confirmation of receipt of the assessment methodology
8 /12/2023	Aunty Jackie McDonald	Email	Request for additional information on impacts to the ground-basement and extent of works
8 /12/2023	Aunty Jackie McDonald	Email	Provision of a more detailed plan of the basements and carparking
8/12/2023	Tweed Byron LALC	Email	Comment on the assessment methodology- the response was supportive of the recommendations of the ACHAR including a “proceed with caution’ approach.
21/12/23	Aunty Jackie McDonald, Paul Buxton, and Tweed Byron LALC.	Email	Provision of the Draft ACHAR
22/12/23	Aunty Jackie McDonald	Emails	Confirmation of receipt of the Draft ACHAR.
9 /7/2024	Aunty Jackie McDonald, Paul Buxton, and Tweed Byron LALC.	Email	Email of the draft ACHAR as the consultation had been issue c6 months previously.
29/7/24	Tweed Byron LALC	Email	Comments on the Connection with Country Design Framework methodology.
1 /8/2024	Aunty Jackie McDonald, and Paul Buxton	Site inspection	The Connection with Country Design Framework included a site inspection and a section on protection of Aboriginal sites/ cultural values within the Subject Site and Cudgen Creek.
16/12/2024	Aunty Jackie McDonald, Paul Buxton, and Tweed Byron LALC.	Email	Update on the DA/SSDA applications to maintain continuous consultation.
11/2/2025	Aunty Jackie McDonald, Paul Buxton, and Tweed Byron LALC.	Email	Provision of updated ACHAR/ Connection to Country Design Report for SSDA application.
10/6/2025	Aunty Jackie McDonald, Paul Buxton, and Tweed Byron LALC.	Email	Provision of updated ACHAR/ Connection to Country Design Report for SSDA application.

5.3 Outcomes of Aboriginal community consultation

The following comments are provided to address the main considerations raised by RAPs as part of the consultation process (Table 3):

Table 3: Outcomes of the Aboriginal community consultation process

Issue raised by RAPs	Response
Information on ground disturbance- specifically the “extent of the footings and their depth”	The assessment methodology was issued based on the master plan/ concept plan. The Draft ACHAR has been updated to include a more detailed engineering plan for the basements and carparking (Figure 2) which provides a more detailed plan of the relationship between the proposed structures and Cudgera Creek.

Issue raised by RAPs	Response
Relationship to an area of mapped heritage.	The assessment methodology included the Tweed Aboriginal Cultural Heritage Management Plan mapping layer- a updated version of the mapping layer was provided confirming that the area of 'Predictive' cultural heritage does not extend to this section of Cudgera Creek.
History of disturbance	<p>It was agreed that the Subject Site has been subject to clear and observable disturbance that would likely:</p> <ul style="list-style-type: none"> • removed Aboriginal archaeological sites (shell midden), • reduce the significance of the Aboriginal archaeological sites, or • remove the spatial integrity of the sites to the extent that archaeological excavation could not provide a meaningful understanding to the nature, extent and significance of the site. <p>Both Aunty Jackie and Pul can remember the former use of the Subject Site as a Holiday Park/ Cabins and noted the history of disturbance from sand mining right along the sand ridge.</p>
Requirement for a 'Proceed with caution' approach	<p>The Draft ACHAR includes management recommendations for:</p> <ul style="list-style-type: none"> • a cultural induction, • an unexpected finds procedure and • provision of sufficient space to retain shell midden- should it be located during early works.
Exclusion of works along Cudgera Creek	The exclusion of works along Cudgera Creek was noted and buffers for environmental protection would reasonably also provide buffers for cultural sites and landscape values.
Connection to the broader landscape (specifically Hastings Point & the Sky)	<p>The Connection to Country design considerations have picked up the blues of the sky and ocean and the sand/greens colour of the beach.</p> <p>Skylights have been considered – the upper rooms have skylights and all rooms have access to the sky via verandahs.</p>
Connection to Cudgera Creek	The Connection to Country framework includes revegetation/ restoration of the and information stations/ signs to be developed with the Aboriginal community.
Community spaces and building entry	The primary strategy is to connect the buildings via the pedestrian path along Cudgera Creek. Once residents are within the facility- the priority is to create local movement for residents who do not have vehicles and are in a supported environment.

6 TECHNICAL REPORT: ABORIGINAL CULTURAL HERITAGE

6.1 Pedestrian survey

The visual inspection aimed to identify Aboriginal objects if present and assess the archaeological potential of the Subject Site on 24 November 2023 with the following RAPs:

- Paul Buxton
- Kalib Nicholls (representing Aunty Jackie McDonald), and
- Maurice Gannon (Tweed Byron LALC).

The survey coverage estimates are provided below and are consistent with archaeological investigations along the coastal strip where grass cover and ground disturbance is relatively high (**Table 4**, **Table 5** and **Figure 12- Figure 17**). The site inspection additionally provided an opportunity to consider the potential future impacts of a Seniors Housing Project on the cultural values of Cudgera Creek and the range of cultural heritage management and mitigation measures necessary to ensure that the proposal would not result in a significant impact to cultural landscape values.

Table 4: Archaeological survey coverage

Survey Unit	Landform	Survey unit area (sq m)	Visibility (%)	Exposure (%)	Effective coverage area (sq m)	Effective Coverage (%)
1	Alluvial creek bank/ lower slope	4500	50	20	450	10

Table 5: Survey coverage by landform

Landform	Landform Area	Area Effectively surveyed (sq m)	% of landform effectively surveyed (%)	Number of sites	Number of artefacts or features
Ridge Crest	15,400	450	2.9	0	0



Figure 12: 87-89 Tweed Coast Road- looking north along Cudgera Creek



Figure 13: 87-89 Tweed Coast Road- looking south towards Cudgera Creek



Figure 14: 87-89 Tweed Coast Road- Gravel pavement from the former caravan park



Figure 15: 87-89 Tweed Coast Road- The bank of Cudgera Creek looking east



Figure 16: 87-89 Tweed Coast Road- The former caravan park site looking north- west



Figure 17: 87-89 Tweed Coast Road- The former caravan park site looking north

6.2 Survey results

The following summarises the outcomes of the site inspection and consultation meeting:

- there are no known Aboriginal sites on the Subject Site or in the immediate vicinity of the Subject Site- previously recorded sites are located at Hastings Point inlet, Hastings Point headland and on the northern arm of Cudgera Creek / Christies Creek
- the Subject Site has obvious and clear indicators of historic ground disturbance including:
 - i. concrete paths and bitumen internal roads form the former caravan park
 - ii. obvious cut and fill earthworks relating to the former caravan park, and
 - iii. underground water/ electrical services.
- While there is the potential that shell midden extends up the estuary of Cudgera Creek to the Subject Site it is reasonable that a midden would be visible if it was present along the creek bank- the immediate creek bank above the high tide mark did not appear to have been subject to significant ground disturbance and no midden was visible in the riparian zone
- The creek bank was substantially protected by the environmental protection and fire asset protection zones and it is reasonable to proceed on the basis that shell midden, if present, would be retained along the creek bank and not subject to disturbance
- the potential for unexpected finds, being stone tools/ open campsites, is possible however it is not considered likely that a archaeological excavation program could identified isolated artefacts or low density stone artefacts scatters given the degree of historic ground disturbance across the Subject Site (see below)
- the Subject Site forms the back of the hind dune and it is expected that the potential occupation of the dune would be from Cudgera Beach- as such coastal shell middens would likely be on the eastern aspect of the dune, and
- based on the available consultation there are no Aboriginal workers or fringe camps that pre-date the 1920's known to occur in the vicinity of the Subject Site.

6.3 Analysis and scientific assessment

Having consideration for the desktop assessment, consultation with Aboriginal community representatives and the outcomes of the archaeological investigations it is possible to make the following statements to inform the ACHAR:

- the Subject Site is located in an area with known archaeological sites and an elevated potential to contain Aboriginal objects, being shell middens and stone artefact scatters, which are common around the estuaries and headlands of the northern rivers
- the previously recorded sites around Hastings Point have been determined to be of moderate-high socio-cultural and scientific significance and include records of burials and ceremonial sites

- the Subject Site does not contain any previously recorded sites and the site inspection confirmed that there was not a high likelihood that shell middens, burials or ceremonial sites would occur within the footprint of the Seniors Housing Project, and
- the archaeological investigation, being meandering pedestrian transects, identified that the former sand mine/ quarry and caravan park have resulted in ground disturbance that would have reasonably affected any Aboriginal archaeological sites should it have existed.

The following table is provided to summarise the findings of the ACHAR and inform the impact assessment (Table 6).

Table 6: Summary of known and potential cultural values

Landform	Known cultural values	Archaeological potential
Creek bank	Shell middens	Shell middens are known to occur along the estuary- shell middens are typically located just above the high tide mark and behind the mangrove forests. No middens are visible on the creek bank and this zone will be avoided to comply with environmental and bushfire requirements.
Hind dune	Isolated artefacts and low density stone artefact scatters	It is not likely that the hind dune was used as a campsite as the primary location for occupation would be the headland/ inlet and the elevated range west of Cudgera Creek. A stone artefact quarry site is known to occur at the around the exposed/ eroding headland- this would reasonably be the focus of tool production. Identifying isolated artefacts and stone tools in a highly disturbed sand deposit would be difficult using standard archaeological sampling/ excavation techniques.

6.4 Requirement for archaeological excavation

Section 3.1 of the CoPAI (DEECW 2010A:24) makes the following comment on the requirement archaeological test-excavations as part of the assessment:

Archaeological test excavation will be necessary when (regardless of whether or not there are objects present on the ground surface) it can be demonstrated through Requirements 1, 2, 3, 4, and 5 that sub-surface Aboriginal objects with potential conservation value have a high probability of being present in an area, and the area cannot be substantially avoided by the proposed activity.

The following comments are provided to address the requirements for archaeological excavation for future ground disturbance that would reasonably arise from the future subdivision and civil works of the Subject Site.

6.4.1 Probability that artefacts will occur within the Subject Site

The results of the archaeological survey are within the range of 'normal' for archaeological investigations on the NSW north coast where the ability to identify sites closely correlates with landforms and the amount of grass cover on the former grazing land. Archaeological investigations in the Tweed Valley / Northern Rivers area have demonstrated that the coastal sand dunes do contain Aboriginal artefacts which are

consistent with the manufacture and maintenance of hunting tools and open campsites. Archaeological sites have been located on the sand dune towards Hastings Point and the density of archaeological sites appears to increase with proximity to the inlet and Hastings Point Headland. The Subject Site is located to the east of the subcoastal hills which contained tall wet forest suitable for macropods and other game and it is reasonable to proceed on the basis that the primary area of occupation has been the margin of the estuary near the Cudgera Creek inlet and the tall forests/ elevated sub coastal hills.

Aboriginal archaeological sites, should they occur in the Subject Site, would typically be classified as 'isolated artefacts' or low density stone artefact scatters and result from the discard of tools during hunting activities in a sporadic manner across the coastal forests and heathland. It is likely that the dune ridges would have been used as pathways around the low-lying swamps and there would likely be some localised vegetation with specific characteristics that would make the dune ridges favourable hunting areas- such as the ability to modify the forest resources using controlled burns to increase macropod populations. The overall archaeological potential of the dune ridge is considered to be low when compared to lower estuary- the primary area of Aboriginal occupation would be the around Hastings Point inlet and headland and the elevated hills near the north arm of Cudgera Creek.

6.4.2 Potential conservation value

In northern NSW, sites which are considered to have 'conservation value' include, for example, bora/ stone arrangement sites, modified trees, rock art, historic sites associated with former Aboriginal reserves and missions and Aboriginal burials. Isolated artefacts and stone artefact scatters are relatively common and would not be considered to be of high conservation value.

One additional consideration is that any sites along the coastline have an elevated significance due to their age and potential to inform research around climate change and adaptation to dynamic environments. However, it is equally likely that similar sites would also be present in areas of the coastal plain which have not been subject to significant disturbance- these areas have a relatively good representation in the National Park estate and within areas subject to environmental controls under the Tweed LEP (2014).

6.4.3 Substantial avoidance

The primary design consideration is that the bank of Cudgera Creek, which is identified as having the potential to contain a shell midden, will be retained in an environmental and fire protection zone- there will be no significant works other than environmental restoration and maintenance along the creek bank.

6.4.4 Summary of requirement for archaeological excavation

Requirement 16A (5) of the CoPAI prescribes that any archaeological excavation must be based on a sampling strategy of less than 0.5% of the landform subject to investigation:

Test excavations units may be combined and excavated as necessary to understand the site characteristics, however:

- i) the maximum continuous surface area of a combination of test excavation units at any single excavation point conducted in accordance with point 1 (above) must be no greater than 3 m²

- ii) the maximum surface area of all test excavation units must be no greater than 0.5% of the area – either PAD or site – being investigated.

As such, any archaeological excavation to confirm the nature and extent of isolated artefacts and low-density stone artefact scatters is not a reliable method to understand the archaeological values of the Subject Site as it is more likely that artefacts will be missed than found when the sample area is <0.5%. This sampling prescription is because the archaeological excavation requirement established by the CoPAI is primarily designed for archaeological sites which have a 'high probability' of occurring in the soil profile- i.e sites which have a moderate to high artefact density. The ACHAR has concluded that the Subject Site does not meet the threshold for archaeological excavation as set out in the CoPAI (DEECWA 2010B)- i.e. it is not considered that an excavation program of <0.5% of the Subject Site would result in the identification of an Aboriginal archaeological sites with potential conservation value that could not be avoided in the event that it was located during civil works.

7 ABORIGINAL CULTURAL HERITAGE ASSESSMENT

7.1 Cultural Values of the Subject Site

The following statements summarise the cultural values of the Subject Site:

- the Subject Site (creek flats) forms part of the Cudgera Creek catchment which is a culturally significant waterway- the lower banks of Cudgera Creek contain Aboriginal shell middens, ceremonial sites, burials and campsites
- isolated stone artefacts/ low density artefacts scatters are known to occur on the coastal dunes and are expected to occur on the elevated ridges and crests – while these landforms are not expected to be large campsites it is likely that the hind dune was used as hunting area between the coast and sub-coastal forests, and
- the rural villages of the Tweed Valley were utilised in the historic period by Aboriginal groups travelling down the coast from Fingal for forestry, fishing and agricultural work.

7.2 Significance Assessment

The following statements are provided to inform the ACHA (**Table 7**):

Table 7: Summary of cultural significance for previously recorded sites

Site type	Significance statements
Middens	Any shell middens which may be retained within the Subject Site have either been highly disturbed by historic sand mining and the caravan park or are located within the riparian zone just above the high tide mark. Middens are cultural significant sites and have an elevated potential to contain Aboriginal burials- these sites will be managed as part of the environmental/ fire protection zones.
Stone artefacts	Stone artefacts may occur throughout the Study Area as isolated artefacts or low-density artefact scatters associated with the use of the coastal dune for hunting. Stone artefacts are relatively common on the Tweed coastline and are likely to have been relocated/ deposited as a result of historic ground disturbance.
Burials	Aboriginal burials are highly significant to the Aboriginal community and are known to occur around Hastings Point.
Ceremonial sites	No ceremonial sites are recorded or known to occur within or in immediate proximity to the Subject Site.
Historic campsites	The Subject Site is not known to have been a workers camp or fringe camp.

The following comments are provided to understand the significance of the Subject Site in accordance with the *Australian ICOMOS Burra Charter* (2013) (**Table 8**):

Table 8: Summary of significance assessment (ICOMOS Burra Charter 2013)

Value	Comment
Social/ Cultural	The Subject Site forms part of the Cudgera Creek catchment which includes culturally significant sites around the inlet at Hastings Point.

Value	Comment
Historic	There are no known work or fringe camps south of Hastings Point- there was not a large sugar cane or banana cultivation area on the coastal sand dune. Aboriginal people were rarely employed in the sand mining industry. There were no forestry camps as the main forestry areas were the sub-coastal ranges and rainforests.
Scientific (Archaeological)	The Subject Site has limited scientific potential as the ground has been subject to significant ground disturbance.
Aesthetic	The Subject Site is not considered to have aesthetic value as it does not contain significant views to the coastline.

The following comments are provided to assess whether the Subject Site meets the criteria of significance as set out in the NSW Heritage Office (2023) guidelines for assessing heritage significance (**Table 9**).

Table 9: Significance Grading (NSW Heritage Office 2023)

Criteria	Assessment Criteria	Significance
A	An item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area).	No
B	An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (or the cultural or natural history of the local area).	No
C	An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area)	No
D	An item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons;	No
E	An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area);	No
F	An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the cultural or natural history of the local area)	No
G	An item is important in demonstrating the principal characteristics of a class of NSW's <ul style="list-style-type: none"> • cultural or natural places; or • cultural or natural environments. (or a class of the local area's <ul style="list-style-type: none"> • cultural or natural places; or • cultural or natural environments.) 	No

7.2.1 Summary Statement of Significance

This assessment of the cultural heritage values at 87-89 Tweed Coast Road has concluded that the Subject Site is not a significant part of the Aboriginal cultural heritage landscape of the lower Tweed Valley. The following comments are provided to inform this statement:

- Aboriginal shell midden is not visible on the banks of Cudgera Creek

- the Subject Site has been subject to a relatively high degree of ground disturbance from sand mining and use as a caravan park, and
- there are no known ceremonial, spiritual or historic sites identified by RAPs during the assessment.

As such, it is reasonable to proceed with the assessment on the basis that it is not likely that the proposed Seniors Housing Project will have a significant impact on the Aboriginal archaeological or cultural landscape.

7.3 Assessment of Harm

7.3.1 *The Proposal*

The TriCare Hastings Point development comprises both independent living units (ILUs) and a residential aged care home (RAC) home, that will be supported by a range of other services.

Specifically, the proposal includes:

- A 47 place RAC (Building D) comprising:
 - i. individual private rooms with ensuite facilities;
 - ii. shared dining, lounge and sitting rooms;
 - iii. café;
 - iv. kitchen;
 - v. serveries;
 - vi. nurses stations;
 - vii. offices;
 - viii. staff room and facilities;
 - ix. waste room; and
 - x. loading bay.
- 51 ILUs split across 3 buildings, including:
 - i. 24 ILUs in Building E
 - ii. 18 ILUs in Building F
 - iii. ILUs in Building G.

Complementing the ILUs and RAC, the development offers a range of communal facilities for entertainment, health, active and passive recreation. These facilities include:

- Bowling Green and pavilion with bowls store, amenities, kitchen and covered seating area;
- Indoor swimming pool and spa, with amenities and viewing area;
- Perimeter walking trail; and
- Landscaped gardens.

The Proposal will provide an important contribution to supporting the need for seniors accommodation within the Kingscliff locality.

The following works associated with the proposed seniors housing project, which would reasonably include the following ground disturbing works (see **Figure 3**):

- Bulk earthworks including the construction of internal roads/ and excavation of footings and underground carparking
- Stormwater detention basins
- Underground utilities including power, water and sewer
- Maintenance of the environmental / fire protection zone along Cudgera Creek, and
- Landscaping and remediation works around the buildings.

7.3.2 Impact Avoidance and Management Strategies

Based on the outcomes of the desktop assessment, the archaeological site inspection and the consultation with the Aboriginal community it is possible to make the following statements regarding avoidance options for archaeological sites (Table 10):

Table 10: Summary of impact avoidance and management strategies

AVOIDANCE MANAGEMENT STRATEGIES	& DISCUSSION
Site avoidance	The primary site avoidance strategy is provided by the environmental and fire protections zones along Cudgera Creek- it is expected that this zone will include shell midden if it occurs along the bank.
Site relocation/ storage	The environment/ fire protection zones provide sufficient open space to relocate and permanently store an unexpected finds 'on-country'. There are precedents for the relocation and permanent storage of archaeological sites in this manner for other coastal developments.
Archaeological investigation	Based on previous studies it is not considered that there is a high likelihood the Subject Site will contain Aboriginal stone artefact scatters or shell middens- an extensive archaeological investigation program would not inform out understanding of the nature, extent and significance of archaeological sites within the Subject Site as the land has been subject to significant historical land disturbance.
Other controls	The primary additional controls for Aboriginal cultural heritage include an induction for contractors and statements for future residents on appropriate responsibilities for Cudgera Creek- including any Aboriginal archaeological sites and cultural landscape values of Cudgera Creek- including public interpretation of landscaping projects including Aboriginal knowledge holders.

7.4 Management Recommendations

The following recommendations should be included within a Aboriginal Heritage Management Plan for the Seniors Housing Project.

7.4.1 Cultural induction

A cultural induction is required for all contractors involved in early works- including all works which require the removal of topsoils- and for contractors who are responsible for the management of the environmental and fire protection zones.

7.4.2 Open space collaborative design

The design of the open spaces, including lands zoned for public recreation and environmental management/conservation lands, should be undertaken in collaboration with representatives of the Aboriginal community to ensure that the residential development has a positive impact on the cultural and ecological values of Cudgera Creek. This should include messages to ensure that future residents do not have a cumulative impact on Cudgera Creek.

7.4.3 Unexpected find procedure

Stone artefacts and Shell Midden. If it is suspected that Aboriginal stone artefacts have been uncovered as a result of ground disturbance within the Subject Site:

- a) work in the surrounding area is to stop immediately and records are made of the finds via project reporting procedures
- b) a temporary fence is to be erected around the site and appropriate controls put in place to ensure that no additional ground disturbance happens in the vicinity of the find
- c) an appropriately qualified archaeological consultant and RAPS are to be engaged to identify the material and provide an initial assessment of the significance of the site and the likely nature and extent of any associated archaeological sites
- d) the stone artefact sites must be reported on the AHIMS database
- e) in the event that the stone artefact site is considered to have been damaged or disturbed, the incident must be reported via a AHIMS Site Impact Recording form, and
- f) works may only recommence after there is agreement from the consultant archaeologist and RAPS on:
 - i. the development of engineering or construction measures to avoid impacts to the Aboriginal heritage values of the (i.e. site avoidance), or
 - ii. agreement from RAPS to provide for the relocation of the stone artefacts and shell material.
 - iii. alternative management and mitigation options for shell midden included the offsite storage/ display and scientific investigation including radio carbon dating or destructive analysis of organic material.

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

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APPENDIX A: AHIMS SEARCH RESULTS

		AHIMS Web Services (AWS) Extensive search - Site list report					Your Ref/PO Number : TH004 Tweed Coast Road Client Service ID : 811387			
SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
04-2-0002	Lower Cudgera;Pottsville;	AGD	56	555000	6859000	Open site	Valid	Ceremonial Ring (Stone or Earth) :-	Bora/Ceremonial	
	Contact		Recorders	Isabel McBryde						
04-2-0003	Lower Cudgera;Pottsville;	AGD	56	555300	6859500	Open site	Valid	Artefact :-	Open Camp Site	
	Contact		Recorders	Unknown Author						
04-5-0040	Norries Head;Bogangar;	AGD	56	556200	6865000	Open site	Valid	Artefact :-, Shell :-	Open Camp Site	
	Contact		Recorders	Australian Museum						
04-2-0066	Young St midden (Parent Site for 04-2-0244)	GDA	56	556400	6862400	Open site	Valid	Shell :-, Artefact :-, Aboriginal Resource and Gathering :-	Midden	
	Contact		Recorders	Mr.Peter Kuskie,Ms.Bernadette Allen						
04-2-0072	SR1	AGD	56	554380	6861600	Open site	Valid	Artefact :-	Open Camp Site	102175
	Contact		Recorders	Ms.Jacqueline Collins						
04-2-0073	SR3	AGD	56	554270	6861470	Open site	Valid	Artefact :-	Open Camp Site	102175
	Contact		Recorders	Ms.Jacqueline Collins						
04-2-0074	SR4	AGD	56	554480	6861500	Open site	Valid	Artefact :-	Open Camp Site	102175
	Contact		Recorders	Ms.Jacqueline Collins						
04-2-0075	SR6; Koala Beach	AGD	56	554570	6860980	Open site	Valid	Artefact :-	Open Camp Site	102175
	Contact		Recorders	Ms.Jacqueline Collins						
04-2-0108	Hastings Point	AGD	56	556650	6862370	Open site	Valid	Artefact :-		
	Contact		Recorders	Mr.Adrian Piper						
04-2-0117	SR2: Koala Bch, Pottsville	AGD	56	554390	6861530	Open site	Valid	Artefact : 1		102175
	Contact		Recorders	Ms.Jacqueline Collins						
04-2-0118	SR5: Koala Bch, Pottsville	AGD	56	554700	6861950	Open site	Valid	Artefact :-		102175
	Contact		Recorders	Ms.Jacqueline Collins						
04-2-0119	SR7: Koala Bch, Pottsville	AGD	56	554700	6862630	Open site	Valid	Artefact : 1		102175
	Contact		Recorders	Ms.Jacqueline Collins						
04-2-0120	SR 8: Koala Bch, Pottsville	AGD	56	554680	6862550	Open site	Valid	Artefact : 1		102175
	Contact		Recorders	Ms.Jacqueline Collins						
04-2-0124	Sites 1 to 4; Collins (1993)	AGD	56	554390	6861530	Open site	Valid	Artefact : 20		
	Contact		Recorders	Guy Holloway						
04-2-0125	Koala Beach stage 7	AGD	56	554920	6861962	Open site	Valid	Artefact : 1		
	Contact		Recorders	Guy Holloway						
04-2-0128	Restriction applied. Please contact ahims@environment.nsw.gov.au.					Open site	Valid			
	Contact		Recorders							
04-2-0129	Cudgen Ochre Quarry	GDA	56	553250	6865750	Open site	Valid	Ochre Quarry :-		
	Contact		Recorders							

Report generated by AHIMS Web Service on 20/08/2023 for Tim Hill for the following area at Lat, Long From : -28.404, 153.4757 - Lat, Long To : -28.3285, 153.5993. Number of Aboriginal sites and Aboriginal objects found is 35

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : TH004 Tweed Coast Road

Client Service ID : 811387

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
04-2-0133	Double Initiation Bora's & Ceremonial Wells	AGD	56	554600	6865550	Open site	Valid	Artefact : -, Modified Tree (Carved or Scarred) : -, Ceremonial Ring (Stone or Earth) : 2, Water Hole : -		
	Contact	Recorders	Ms.Stella Wheildon					Permits		
04-2-0134	Ochre Quarry	AGD	56	553250	6865750	Open site	Valid	Ochre Quarry : -		
	Contact Searle	Recorders	Ms.Stella Wheildon					Permits		
04-2-0145	Hastings Point Quarry	AGD	56	555410	6862500	Open site	Valid	Stone Arrangement : 1		
	Contact T Russell	Recorders	Mr.Adrian Piper					Permits		
04-2-0147	South Pottsville 1	AGD	56	554320	6857750	Open site	Valid	Artefact : 1		
	Contact T Russell	Recorders	Mr.Adrian Piper					Permits		
04-2-0173	KUDGEREE AVENUE 1	GDA	56	551970	6858410	Open site	Valid	Artefact : -, Modified Tree (Carved or Scarred) : -		101741
	Contact	Recorders	Everick Heritage Pty Ltd					Permits		
04-2-0221	Seabreeze Tweed ACH Artefacts	GDA	56	554005	6859782	Open site	Valid	Artefact : -		
	Contact	Recorders	Mr.Ian Fox					Permits		
04-2-0208	West Pottsville Tweed ACH Burials	GDA	56	554286	6859184	Open site	Valid	Burial : -		
	Contact	Recorders	Mr.Ian Fox					Permits		
04-2-0214	Hastings Point Estuary Tweed ACH Fish Traps	GDA	56	556407	6862785	Open site	Valid	Fish Trap : -		
	Contact	Recorders	Mr.Ian Fox					Permits		
04-2-0226	Round Mountain Tweed ACH Quarry Resource	GDA	56	554963	6865842	Open site	Valid	Stone Quarry : -		
	Contact	Recorders	Mr.Ian Fox					Permits		
04-2-0244	Tweed Coast Road Midden	GDA	56	556448	6862480	Closed site	Partially Destroyed	Shell : -		
	Contact	Recorders	Everick Heritage Pty Ltd, Everick Heritage Pty Ltd, Mr.Tim Hill, Mr.Tim Hill					Permits	4277	
04-2-0228	Elizabeth Street Tweed ACH Shell Middens	GDA	56	555307	6859463	Open site	Partially Destroyed	Shell : -		104399
	Contact	Recorders	Mr.Ian Fox, Remnant Archaeology					Permits	4212, 4229	
04-2-0251	Fresh Spring	GDA	56	556475	6862594	Open site	Valid	Aboriginal Ceremony and Dreaming : 1		
	Contact Tweed Byron Local Aboriginal	Recorders	Virtus Heritage Pty Ltd - Pottsville					Permits		
04-2-0252	Hastings Point Headland	GDA	56	556709	6862500	Open site	Valid	Aboriginal Ceremony and Dreaming : 1		
	Contact Tweed Byron Local Aboriginal	Recorders	Virtus Heritage Pty Ltd - Pottsville					Permits		
04-2-0253	Cultural Landscape surrounding (Hastings Point)	GDA	56	556710	6862505	Open site	Valid	Aboriginal Ceremony and Dreaming : 1		

Report generated by AHIMS Web Service on 20/08/2023 for Tim Hill for the following area at Lat, Long From : -28.404, 153.4757 - Lat, Long To : -28.3285, 153.5993. Number of Aboriginal sites and Aboriginal objects found is 35

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AHIMS Web Services (AWS)

Extensive search - Site list report

Your Ref/PO Number : TH004 Tweed Coast Road

Client Service ID : 811387

SiteID	SiteName	Datum	Zone	Easting	Northing	Context	Site Status **	SiteFeatures	SiteTypes	Reports
04-2-0133	Double Initiation Bora's & Ceremonial Wells	AGD	56	554600	6865550	Open site	Valid	Artefact : -, Modified Tree (Carved or Scarred) : -, Ceremonial Ring (Stone or Earth) : 2, Water Hole : -		
	<u>Contact</u>	<u>Recorders</u>	Ms.Stella Wheildon					<u>Permits</u>		
04-2-0134	Ochre Quarry	AGD	56	553250	6865750	Open site	Valid	Ochre Quarry : -		
	<u>Contact</u> Searle	<u>Recorders</u>	Ms.Stella Wheildon					<u>Permits</u>		
04-2-0145	Hastings Point Quarry	AGD	56	555410	6862500	Open site	Valid	Stone Arrangement : 1		
	<u>Contact</u> T Russell	<u>Recorders</u>	Mr.Adrian Piper					<u>Permits</u>		
04-2-0147	South Pottsville 1	AGD	56	554320	6857750	Open site	Valid	Artefact : 1		
	<u>Contact</u> T Russell	<u>Recorders</u>	Mr.Adrian Piper					<u>Permits</u>		
04-2-0173	KUDGEREE AVENUE 1	GDA	56	551970	6858410	Open site	Valid	Artefact : -, Modified Tree (Carved or Scarred) : -		101741
	<u>Contact</u>	<u>Recorders</u>	Everick Heritage Pty Ltd					<u>Permits</u>		
04-2-0221	Seabreeze Tweed ACH Artefacts	GDA	56	554005	6859782	Open site	Valid	Artefact : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Jan Fox					<u>Permits</u>		
04-2-0208	West Pottsville Tweed ACH Burials	GDA	56	554286	6859184	Open site	Valid	Burial : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Jan Fox					<u>Permits</u>		
04-2-0214	Hastings Point Estuary Tweed ACH Fish Traps	GDA	56	556407	6862785	Open site	Valid	Fish Trap : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Jan Fox					<u>Permits</u>		
04-2-0226	Round Mountain Tweed ACH Quarry Resource	GDA	56	554963	6865842	Open site	Valid	Stone Quarry : -		
	<u>Contact</u>	<u>Recorders</u>	Mr.Jan Fox					<u>Permits</u>		
04-2-0244	Tweed Coast Road Midden	GDA	56	556448	6862480	Closed site	Partially Destroyed	Shell : -		
	<u>Contact</u>	<u>Recorders</u>	Everick Heritage Pty Ltd, Everick Heritage Pty Ltd, Mr.Tim Hill, Mr.Tim Hill					<u>Permits</u>	4277	
04-2-0228	Elizabeth Street Tweed ACH Shell Middens	GDA	56	555307	6859463	Open site	Partially Destroyed	Shell : -		104399
	<u>Contact</u>	<u>Recorders</u>	Mr.Jan Fox, Remnant Archaeology					<u>Permits</u>	4212, 4229	
04-2-0251	Fresh Spring	GDA	56	556475	6862594	Open site	Valid	Aboriginal Ceremony and Dreaming : 1		
	<u>Contact</u> Tweed Byron Local Aboriginal	<u>Recorders</u>	Virtus Heritage Pty Ltd - Pottsville					<u>Permits</u>		
04-2-0252	Hastings Point Headland	GDA	56	556709	6862500	Open site	Valid	Aboriginal Ceremony and Dreaming : 1		
	<u>Contact</u> Tweed Byron Local Aboriginal	<u>Recorders</u>	Virtus Heritage Pty Ltd - Pottsville					<u>Permits</u>		
04-2-0253	Cultural Landscape surrounding (Hastings Point)	GDA	56	556710	6862505	Open site	Valid	Aboriginal Ceremony and Dreaming : 1		

Report generated by AHIMS Web Service on 20/08/2023 for Tim Hill for the following area at Lat, Long From : -28.404, 153.4757 - Lat, Long To : -28.3285, 153.5993. Number of Aboriginal sites and Aboriginal objects found is 35

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APPENDIX B: PLANS & DRAWINGS

MASTERPLAN CONSIDERATIONS

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24.08.16	DRAFT DA PACKAGE	B
24.10.09	DA PACKAGE	C



PRECINCTS



SUB-PRECINCTS



VEHICULAR CIRCULATION



PEDESTRIAN CIRCULATION

CLIENT



PROJECT

TRICARE HASTINGS POINT
87 TWEED COAST RD, HASTINGS
POINT 2489, NSW

COUNTRY: BUNDJALLUNG

DRAWING
**MASTERPLAN DESIGN
CONSIDERATIONS**

JOB NUMBER	DESIGN	DRAWN	CHECKED
23-0025	SP	NF	SP

SCALE	DATE CREATED	NORTH
BA1 BA3	01/12/23	

DRAWING NUMBER	ISSUE
DA-1-11	C

ISSUED FOR:

Integrated perspective

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24.04.15	FOR INFORMATION	E
24.08.12	FOR INFORMATION	F
24.08.16	DRAFT DA PACKAGE	G
24.10.03	UPDATED DRAFT DA PACKAGE	H
24.10.09	DA PACKAGE	I

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PROJECT

TRICARE HASTINGS POINT
87 TWEED COAST RD, HASTINGS POINT 2469, NSW

COUNTRY: BUNDJALLUNG

DRAWING

SITE PLAN - GROUND FLOOR (AGED CARE FACILITY)

JOB NUMBER	DESIGN	DRAWN	CHECKED
23-0025	SP	KF.SS	SP

SCALE	DATE CREATED	NORTH
1:500 @A1	29/06/23	
1:1000 @A3		

DRAWING NUMBER

DA-2-02

ISSUE

I

RESI 878 FDR



ECOLOGICAL ZONES LEGEND

- CURRENT RIPARIAN VEGETATION TREE LINE
- CORE REHABILITATION ZONE
- RESIDUAL OUTER REHABILITATION ZONE
- APZ LINE

1 OVERALL SITE - GROUND LEVEL
13-1-04 1:500

Integrated perspective

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24.10.09	DA PACKAGE	D

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PROJECT

TRICARE HASTINGS POINT
 87 TWEED COAST RD, HASTINGS POINT 2489, NSW

COUNTRY: BUNDJALLUNG
 DRAWING

OVERALL SITE SECTIONS

JOB NUMBER: 23-0025
 DESIGN: SP
 DRAWN: KF
 CHECKED: SP

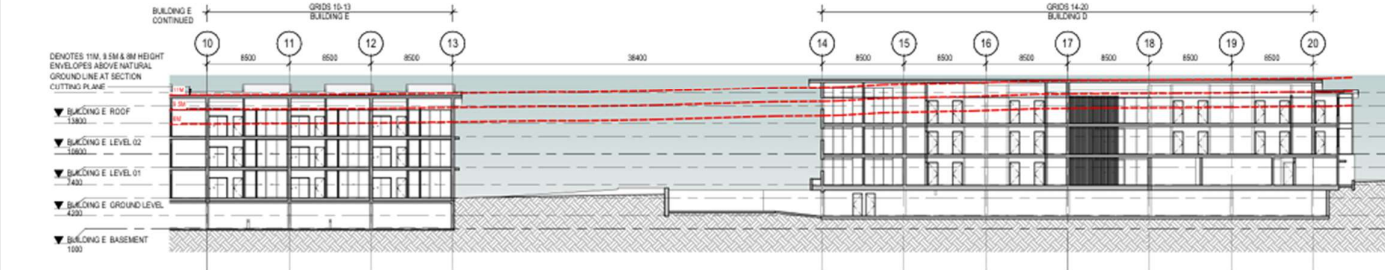
SCALE: 1:250
 DATE CREATED: 18/09/2023
 NORTH: (B)A1, (B)A3

DRAWING NUMBER: **DA-2-31**
 ISSUE: **D**

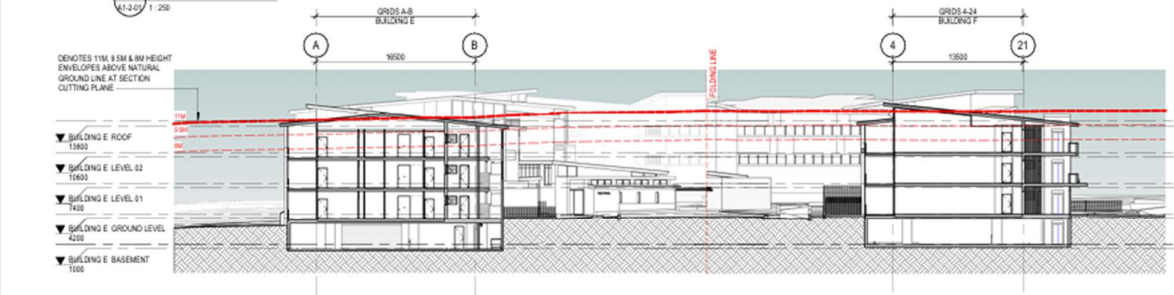
ISSUED FOR:



1 OVERALL SITE SECTION 1 - PART 1
 A1-2/01 1:250



2 OVERALL SITE SECTION 2
 A1-2/01 1:250



4 OVERALL SITE SECTION 3
 A1-2/01 1:250



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APPROACHING STAGE 2 OF DEVELOPMENT



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PROJECT

TRICARE HASTINGS POINT
87 TWEED COAST RD, HASTINGS
POINT 2469, NSW

COUNTRY: BUNDJALUNG

DRAWING

OVERALL SITE PERSPECTIVES

JOB NUMBER	DESIGN	DRAWN	CHECKED
23-0025	SP	KF	SP

SCALE	DATE CREATED	NORTH
1:2000	@A1 01/12/23	@A3

DRAWING NUMBER	ISSUE
DA-3-01	B

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24.04.15	FOR INFORMATION	E
24.06.16	DRAFT DA PACKAGE	F
24.10.09	DA PACKAGE	G

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PROJECT

TRICARE HASTINGS POINT
87 TWEED COAST RD, HASTINGS POINT 2489, NSW

COUNTRY: BUNDJALING

DRAWING
BUILDING D (AGED CARE FACILITY) - LEVEL 01 GA PLAN

JOB NUMBER: 23-0025
DESIGN: SP
DRAWN: HF
CHECKED: SP

SCALE: 1:100 @A1
DATE CREATED: 03/11/23
1:200 @A3

DRAWING NUMBER: **DA-D1-03**
ISSUE: **G**

ISSUED FOR:



BUILDING D (AGED CARE FACILITY) - LEVEL 01
GA PLAN
1:100



Integrated perspective

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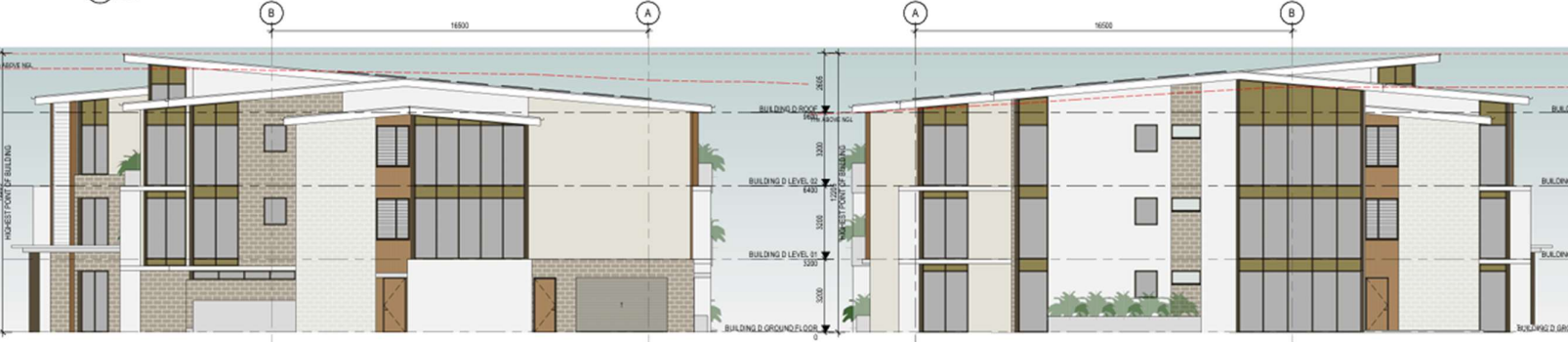
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24.04.15	FOR INFORMATION	E
24.06.16	DRAFT DA PACKAGE	F
24.10.23	UPDATED DRAFT DA PACKAGE	G
24.10.09	DA PACKAGE	H



1 BUILDING D (AGED CARE FACILITY) - SOUTH ELEVATION
 1:100



2 BUILDING D (AGED CARE FACILITY) - NORTH ELEVATION
 1:100



3 BUILDING D (AGED CARE FACILITY) - EAST ELEVATION
 1:100

4 BUILDING D (AGED CARE FACILITY) - WEST ELEVATION
 1:100



PROJECT
 TRICARE HASTINGS POINT
 87 TWEED COAST RD, HASTINGS POINT 2489, NSW

COUNTRY: BUNDJALUNG
DRAWING
 BUILDING D (AGED CARE FACILITY) - EXTERNAL ELEVATIONS
JOB NUMBER: 23-0025
DESIGN: SP
DRAWN: KF
CHECKED: SP

SCALE: 1:100 @A1, 1:200 @A3
DATE CREATED: 03/11/23
ORIENTATION: NORTH

DRAWING NUMBER: DA-D1-07
ISSUE: H
ISSUED FOR: