

EILEEN O'CONNOR CATHOLIC SCHOOL,
84 GAVENLOCK ROAD, MARDI

ABORIGINAL CULTURAL HERITAGE ASSESSMENT REPORT

Report to Catholic Schools Broken Bay

LGA: Central Coast

March 2025





Eileen O'Connor
Catholic School



Planning Secretary's Environmental Assessment Requirements

Development Details

Application No: SSD-67173718
Project Name: New Eileen O'Connor Catholic School
Location: 84 Gavenlock Road, Mardi NSW 2259
Lot 9 Section 4 DP3368 within Central Coast
Applicant: Catholic Schools Broken Bay

The following documentation has been prepared to support the State Significant Development Application for the above project and in accordance with the Planning Secretary's Environmental Assessment Requirements (SEARS) dated 19th February 2024 as follows:

	Issue and Assessment Requirements	Relevant Section of this Report
18	Aboriginal Cultural Heritage: Provide an Aboriginal Cultural Heritage Assessment Report prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts on any Aboriginal cultural heritage values on the land.	Refer full report (Chapters 1-7)



Eileen O'Connor
Catholic School

Apex Archaeology acknowledges and pays respect to the past, present and future Traditional Custodians and Elders of this nation and in whose land this assessment took place, and to the continuation of cultural, spiritual and educational practices of Aboriginal and Torres Strait Islander peoples.

DOCUMENT CONTROL

The following register documents the development and issue of the document entitled 'Eileen O'Connor Catholic School at 84 Gavenlock Road, Mardi, NSW: Aboriginal Cultural Heritage Assessment Report', prepared by Apex Archaeology in accordance with its quality management system.

Revision	Prepared by	Reviewed by	Comment	Issue Date
1 – Draft	Rebecca Bryant	Jenni Bate	Client Review	28 March 2024
2 – Draft	Rebecca Bryant	Stanton Dahl	Issue for RAPs	18 April 2024
3 – Final	Rebecca Bryant	RAPs	Issue of final	17 May 2024
4 – Final	Jenni Bate		Minor changes	14 March 2025



EXECUTIVE SUMMARY

Apex Archaeology have been engaged to assist Catholic Schools Broken Bay (CSBB) to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for a new school at 84 Gavenlock Road, Mardi, NSW, within Lot 9 Section 4 DP 3368. The project is located within the Central Coast LGA. The school will be known as the Eileen O'Connor Catholic School and will be assessed as a State Significant Development (SSD-67173718) under Division 4.7 of the *Environmental Planning & Assessment Act* (1979). Following issue of the Secretary's Environmental Assessment Requirements (SEARs) (SSD-67173718), requirement No. 18 states that an Aboriginal Cultural Heritage Assessment Report be prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts on any Aboriginal cultural heritage values on the land.

This ACHA has been prepared in accordance with the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (April 2011); the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, April 2010) (the ACHCRs). A separate Archaeological Report (AR) detailing the results of the assessment prepared in line with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (September 2010) (the Code of Practice) is attached as an appendix to this report.

The proposed development includes the demolition of the existing structures and the construction of the new Eileen O'Connor Catholic School in the northwest corner of Lot 9 Section 4 DP3368, within the grounds of the existing St Peter's Catholic College. The proposed works will include construction, subdivision and operation of a new Catholic school for 200 students with special needs, comprising 20 general learning areas, flexible specialist learning areas, administration and staff facilities, library, hall, amenities and associated site preparation works, landscaping, play space and on-site car parking and kiss and drop, together with road upgrades for Keefers Glen. These activities, along with the implementation of services such as water, electricity and telecommunications are expected to result in subsurface excavations and modification to the natural landscape. There is also a probability that excavated soil will be removed from the study area or redeposited within it, and other fill may be introduced to the site.

A total of twelve Aboriginal people and organisations registered an interest in being consulted for the project. The following list comprises the registered Aboriginal parties (RAPs) for the project:

- Darkinjung Local Aboriginal Land Council (DLALC)
- A1 Indigenous Services
- Amanda Hickey Cultural Services
- Awabakal Traditional Owners Aboriginal Corporation
- Awabakal and Guringai Pty Ltd



- Corroboree Aboriginal Corporation
- Gomeroy Consultation
- Gunjeewong Cultural Heritage
- Kevin Duncan
- Thomas Dahlstrom
- Trudy Smith
- Widescope Indigenous Group

The current investigation included a pedestrian survey that was undertaken by Apex Archaeology and DLALC in February 2024. The results of this survey, along with consideration of previous archaeological and heritage investigations within the surrounding area and the past and current environment, found the entire site had been impacted by previous vegetation clearance and subsequent revegetation, the construction and subsequent infilling of dams, and then the construction of the St Peter's Catholic College across the majority of the study area. Given the significant historical land disturbance and the underlying landform within the study area boundaries, it was concluded that it is unlikely that any intact archaeological deposits would remain within the study area.

Based on the results of the cultural heritage and archaeological assessments, the following recommendations have been made for the project:

RECOMMENDATION 1: NO FURTHER ARCHAEOLOGICAL ASSESSMENT REQUIRED

This report details the archaeological potential of the site, which has been assessed as negligible. No further archaeological assessment is required for the site prior to the commencement of proposed development activities.

RECOMMENDATION 2: INSTALLATION OF ACKNOWLEDGEMENT

It is recommended that consideration is given to the installation of an acknowledgement to the traditional Aboriginal owners of the land. This could be addressed in the future through the Connecting to Country component of the project.

RECOMMENDATION 3: DEVELOPMENT BOUNDARIES

The proposed development works must be contained within the assessed boundaries for this project. If there is any alteration to the boundaries of the proposed development to include areas not assessed as part of this archaeological investigation, further investigation of those areas should be completed to assist in managing Aboriginal objects and places which may be present in an appropriate manner.

RECOMMENDATION 4: STOP WORK PROVISION

Should unanticipated Aboriginal archaeological material be encountered during site works, all work must cease in the vicinity of the find and an archaeologist contacted to make an assessment of the find and to advise on the course of action to be taken. Further archaeological assessment and Aboriginal community consultation may be



required prior to the recommencement of works. Any objects confirmed to be Aboriginal in origin must be reported to Heritage NSW.

In the unlikely event that suspected human remains are identified during construction works, all activity in the vicinity of the find must cease immediately and the find protected from harm or damage. The NSW Police and the Coroner's Office must be notified immediately. If the finds are confirmed to be human and of Aboriginal origin, further assessment by an archaeologist experienced in the assessment of human remains and consultation with both Heritage NSW and the RAPs for the project would be required.

RECOMMENDATION 5: REPORTING

One digital copy of this report should be forwarded to Heritage NSW for inclusion on the Aboriginal Heritage Information Management System (AHIMS).

One copy of this report should be forwarded to each of the 12 registered Aboriginal stakeholders for the project.



GLOSSARY OF TERMS

Aboriginal Object	An object relating to the Aboriginal habitation of NSW (as defined in the NPW Act), which may comprise a deposit, object or material evidence, including Aboriginal human remains.
ACHA	Aboriginal Cultural Heritage Assessment
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACHCRs	<i>Aboriginal cultural heritage consultation requirements for proponents 2010</i>
AHIMS	Aboriginal Heritage Information Management System maintained by Heritage NSW, detailing known and registered Aboriginal archaeological sites within NSW
AHIP	Aboriginal Heritage Impact Permit
ASIRF	Aboriginal Site Impact Recording Form
BP	Before Present, defined as before 1 January 1950.
Code of Practice	The DECCW September 2010 <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales</i>
Consultation	Aboriginal community consultation in accordance with the DECCW April 2010 <i>Aboriginal cultural heritage consultation requirements for proponents 2010</i> .
CSBB	Catholic Schools Broken Bay
DA	Development Application
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DECCW	The Department of Environment, Climate Change and Water (now Heritage NSW)
Disturbed Land	If land has been subject to previous human activity which has changed the land's surface and are clear and observable, then that land is considered to be disturbed
Due Diligence	Taking reasonable and practical steps to determine the potential for an activity to harm Aboriginal objects under the <i>National Parks and Wildlife Act 1974</i> and whether an application for an AHIP is required prior to commencement of any site works, and determining the steps to be taken to avoid harm
Due Diligence Code of Practice	The DECCW Sept 2010 <i>Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales</i>
GIS	Geographical Information Systems
GSV	Ground Surface Visibility
Harm	To destroy, deface or damage an Aboriginal object; to move an object from land on which it is situated, or to cause or permit an object to be harmed
Heritage NSW	Heritage NSW within the Department of Climate Change, Energy, the Environment and Water; responsible for overseeing heritage matters within NSW
ka	Kiloannus, a unit of time equating to 1,000 years
LALC	Local Aboriginal Land Council
LGA	Local Government Area
NPW Act	<i>NSW National Parks and Wildlife Act 1974</i>
NPWS	National Parks and Wildlife Service
OEH	The Office of Environment and Heritage (now Heritage NSW)
PAD	Potential Archaeological Deposit
RAPs	Registered Aboriginal Parties



CONTENTS

1.0	Introduction.....	1
1.1	Project Proponent.....	1
1.2	Study Area and Project Brief.....	1
1.3	Statutory Context	6
1.3.1	NSW Environmental Planning and Assessment Act 1979.....	6
1.3.2	National Parks and Wildlife Act 1974.....	7
1.3.3	NSW National Parks and Wildlife Regulation 2019.....	7
1.4	Objectives of the Aboriginal Cultural Heritage Assessment	7
1.5	Limitations.....	8
2.0	Aboriginal Consultation Process	10
2.1	The Consultation Process	10
2.2	Stage 1 Consultation: Commencement	11
2.3	Stage 2 & 3 Consultation: Presentation and Gathering of Information.....	12
2.4	Stage 4: Review of Draft Report	14
3.0	Summary and Analysis of Background Information.....	16
3.1	Description of the Study Area.....	16
3.2	Existing Environment	16
3.2.1	Geology, Topography and Soils	16
3.2.2	Flora and Fauna.....	17
3.2.3	Hydrology	17
3.3	Material Evidence of Aboriginal Land Use	18
3.3.1	AHIMS	18
3.3.2	Previous Archaeological Assessment.....	21
3.4	Ethnohistory	22
4.0	Aboriginal Cultural Heritage Significance Assessment	25
4.1	Introduction	25
4.2	Criteria	25
4.3	Significance Assessment	25
4.4	Cultural Significance Assessment	26
4.5	Statement of Archaeological Significance.....	26
5.0	Avoiding and Minimising Harm.....	27
5.1	Proposed Activity	27



5.2	Justification.....	27
5.3	Avoidance of Harm.....	27
5.4	Ecologically Sustainable Development	27
5.4.1	Intergenerational Equity.....	28
5.4.2	Cumulative Impacts.....	28
5.5	Aboriginal Community Input	28
6.0	Recommendations	29
7.0	Bibliography	31

APPENDICES

Appendix A: Correspondence Log

Appendix B: Step 1 Letters and Responses

Appendix C: Step 2 Letters and Responses

Appendix D: Advertisement

Appendix E: Methodology, Cover Letters and Responses

Appendix F: Draft Report Emails and Responses

Appendix G: Archaeological Report

FIGURES

Figure 1: Study area within its regional context	3
Figure 2: Study area and subject site for the proposed new Eileen O'Connor Catholic School.	4
Figure 3: Plan view of approved development layout (Source: Stanton Dahl Architects March 2024)	5
Figure 4: The Strahler system (Source: Department of Planning and Environment 2016).....	18
Figure 5: AHIMS sites within a 5km area of the study area.	20



1.0 INTRODUCTION

Apex Archaeology have been engaged to assist Catholic Schools Broken Bay (CSBB) to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for a new school at 84 Gavenlock Road, Mardi. The project is located within the Central Coast Local Government Area (LGA) and the school will be known as the Eileen O'Connor Catholic School. The project will be assessed as a State Significant Development (SSD-67173718) under Division 4.7 of the *Environmental Planning & Assessment Act* (1979).

Following issue of the Secretary's Environmental Assessment Requirements (SEARs) for the project (SSD-67173718), assessment requirement No. 18 states that an Aboriginal Cultural Heritage Assessment Report be prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts on any Aboriginal cultural heritage values on the land.

This report has been prepared in accordance with the *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (April 2011); the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW, April 2010) (the ACHCRs); and the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (September 2010) (the Code of Practice). It has been prepared to inform the State Significant Development (SSD-67173718) requirements for the project Environmental Impact Statement (EIS).

1.1 PROJECT PROPONENT

The proponent for the project was initially The Trustees of the Roman Catholic Church for the Diocese of Broken Bay, with a subsequent name change to Catholic Schools Broken Bay. The project manager for the proponent was Domenic Marra from Stanton Dahl Architects.

1.2 STUDY AREA AND PROJECT BRIEF

The study area is located at 84 Gavenlock Road, Mardi, which is situated approximately 4 km west of Tuggerah Lake that opens up to the Pacific Ocean (Figure 1 and Figure 2). The study area is approximately 20 km northeast of the Gosford CBD and about 100 km north of the Sydney CBD. It is legally referred to as Lot 9 Section 4 DP 3368, and is within the County of Northumberland and Parish of Tuggerah. It is approximately 133,053 m² in size.

The proposed development within the study area is for the construction of the new Eileen O'Connor Catholic School for school children with special needs, in the far northwest section on land within the grounds of the existing St Peter's Catholic College (Figure 2). The proposed works will include construction, subdivision and operation of a new Catholic school for 200 students with special needs, comprising 20 general learning areas, flexible specialist learning areas, administration and staff



facilities, library, hall, amenities and associated site preparation works, landscaping, play space and on-site car parking and kiss and drop, together with road upgrades for Keefers Glen (Figure 3).

These activities, along with the implementation of services such as water, electricity and telecommunications are expected to result in subsurface excavations and modification to the natural landscape. There is also a probability that excavated soil will be removed from the study area or redeposited within it, and other fill may be introduced to the site. As these activities may potentially impact any items of Aboriginal heritage, a more comprehensive investigation in the form of an Aboriginal cultural heritage assessment was required to determine the nature and extent of potential deposits within the study area, and whether any sites identified could be avoided by the proposed works.

The project is being assessed as part of a State Significant Development Application (SSD-67173718) and item No. 18 of the Secretary's Environmental Assessment Requirements (SEARs) for the project requires an ACHA. This to be prepared in accordance with relevant guidelines, identifying, describing, and assessing any impacts on any Aboriginal cultural heritage values on the land.

As a result, Apex Archaeology has been engaged to undertake the ACHA in consultation with the local Aboriginal community. This will assist the consent authority in their assessment of the proposal.



Figure 1: Study area within its regional context.



PO Box 236
NOWRA
NEW SOUTH WALES 2541

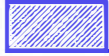
0 10.5 21
kilometres

Projection:
MGA Zone 56 (GDA 94)
Base Map:
Six Maps Topo
Final - Version 1





Study Area



Subject Site



Lot Boundaries



0

120

240



metres

Projection:
MGA Zone 56 (GDA 94)
Base Map:
NEar Maps 2024
Image Date: 29/10/2023
Final - Version 1

Figure 2: Study area and subject site for the proposed Eileen O'Connor Catholic School.



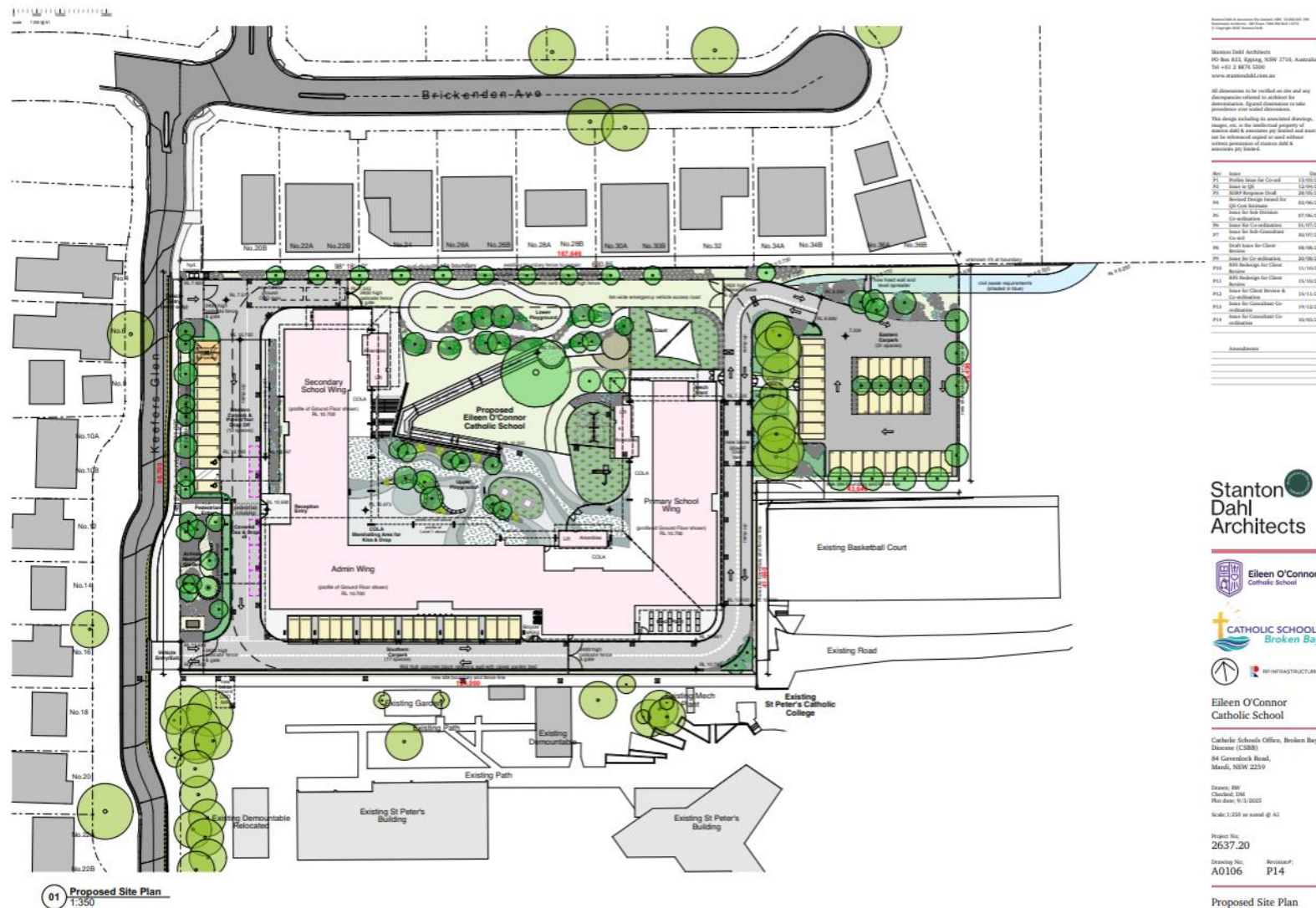


Figure 3: Plan view of approved development layout (Source: Stanton Dahl Architects March 2025)



1.3 STATUTORY CONTEXT

The assessment will inform a State Significant Development Application (SSD-67173718) under Part 4 Division 4.7 of the *Environmental Planning and Assessment Act 1979*. This report has been prepared to inform the Environmental Impact Statement (EIS) required for the project, and to meet the Secretary's Environmental Assessment Requirements (SEARs) for the project. Item no. 18 of the SEARs for the project requires an ACHA. This to be prepared in accordance with relevant guidelines, identifying, describing and assessing any impacts on any Aboriginal cultural heritage values on the land.

1.3.1 NSW ENVIRONMENTAL PLANNING AND ASSESSMENT ACT 1979

Part 4, division 4.7 State Significant Development of the EP&A Act outlines the requirements for assessment of State Significant Development. Section 4.41 outlines approvals and legislation that does not apply to SSD projects. This clause states:

1. The following authorisations are not required for State significant development that is authorised by a development consent granted after the commencement of this Division (and accordingly the provisions of any Act that prohibit an activity without such an authority do not apply)-
 - a) (repealed)
 - b) A permit under section 201, 205 or 219 of the *Fisheries Management Act 1994*
 - c) An approval under Part 4, or an excavation permit under section 139, of the *Heritage Act 1977*
 - d) **An Aboriginal heritage impact permit under section 90 of the *National Parks and Wildlife Act 1997***
 - e) (repealed)
 - f) A bush fire safety authority under section 100B of the *Rural Fires Act 1997*
 - g) A water use approval under section 89, a water management work approval under section 90 or an activity approval (other than an aquifer interference approval) under section 91 of the *Water Management Act 2000*.
2. Division 8 of Part 6 of the *Heritage Act 1977* does not apply to prevent or interfere with the carrying out of State significant development that is authorised by a development consent granted after the commencement of this Division.
3. A reference in this section to State significant development that is authorised by a development consent granted after the commencement of this Division includes a reference to any investigative or other activities that are required to be carried out for the purposed of complying with any environmental assessment requirements under this Part in connection with a development application for any such development.

The EPA Act is administered by the Department of Planning, Housing and Infrastructure and the Minister will determine this project. In accordance with this



act, there is no requirement to obtain consent from Heritage NSW under the provisions of s.90 of the NPW Act.

1.3.2 NATIONAL PARKS AND WILDLIFE ACT 1974

The *National Parks and Wildlife Act 1974* provides protection for all Aboriginal objects and places within NSW. Aboriginal objects are defined as the material evidence of the Aboriginal occupation of NSW, while Aboriginal Places are defined as areas of cultural significance to the Aboriginal community. All Aboriginal objects are protected equally under the Act, regardless of their level of significance. Aboriginal Places are gazetted if the Minister is satisfied that the location was and/or is of special significance to Aboriginal people.

Following amendments to the NPW Act in 2010, approval to impact Aboriginal cultural heritage sites is only granted under a Section 90 AHIP, which is granted by Heritage NSW in the Department of Climate Change, Energy, the Environment and Water (DCCEEW). In this instance, the requirement to obtain an AHIP under Section 90 of the NPW Act is “switched off” by the requirements of the EPA Act.

1.3.3 NSW NATIONAL PARKS AND WILDLIFE REGULATION 2019

Part 5, Division 2 of the *National Parks and Wildlife Regulation 2019* addresses Aboriginal objects and places in relation to the NPW Act 1974, and outlines how compliance with relevant codes of practice can be met.

Clause 58(1) outlines the defence of low impact acts or omissions to the offence of harming Aboriginal objects, which includes maintenance works on existing roads and fire trails, farming and land management work, grazing of animals, activities on land that has been disturbed that is exempt or complying development, mining exploration work, removal of vegetation (aside from Aboriginal culturally modified trees), seismic surveying or groundwater monitoring bores on disturbed ground, or environmental rehabilitation work (aside from erosion control or soil conservation works such as contour banks).

Clause 58(4) outlines the definition of ‘disturbed land’, as land that “has been the subject of a human activity that has changed the land’s surface, being changes that remain clear and observable”.

Clause 59 relates to the notification of Aboriginal objects and sites and Clause 60 relates to the requirements for the consultation process to support an AHIP application. The regulation sets out the requirements broadly in line with those outlined in the ACHCRs.

1.4 OBJECTIVES OF THE ABORIGINAL CULTURAL HERITAGE ASSESSMENT

The archaeological investigation was undertaken to meet the requirements of the Code of Practice and ACHCRs.



The purpose of the archaeological investigation is to understand and establish the potential harm the proposed development may have on Aboriginal cultural heritage within the study area, both tangible and intangible.

Aboriginal community consultation was undertaken for the project with the aim of:

- Identifying the Aboriginal community members who can speak for Country within which the study area is located;
- Involving the Aboriginal community in making decisions about the management of their cultural heritage;
- Identifying, assessing and recording Aboriginal heritage values within the study area;
- Preparing an assessment of the cultural heritage values in consultation with the Aboriginal community;
- Identifying the potential impact of the proposed development on the assessed cultural heritage values; and
- Developing conservation and mitigation strategies for these values, with the aim of minimising impacts to cultural heritage wherever possible.

In addition, this report provides a significance assessment of the identified Aboriginal heritage values, as defined by the registered Aboriginal stakeholders (RAPs) for the project. Aboriginal people are the primary determinants of the significance of their cultural heritage and therefore Apex Archaeology cannot make a determination on the cultural significance without the input of the RAPs.

Any development works which disturb the ground surface have the potential to impact Aboriginal archaeological deposits and therefore an assessment of whether the study area contains such deposits is required prior to the commencement of construction works. An assessment of whether the proposed development would impact these deposits (if present) is also necessary, and identification of to what extent the deposits would be impacted is also required. The degree of impact which may be allowable is determined, in part, with consideration of the level of cultural significance attributed to the cultural values of the study area, both tangible and intangible.

1.5 LIMITATIONS

This report relies in part on previously recorded archaeological and environmental information for the wider region. This includes information from AHIMS, which is acknowledged to be occasionally inaccurate, due to inaccuracies in recording methods. No independent verification of the results of external reports has been made as part of this report.

It should be noted that AHIMS results are a record only of the sites that have been previously registered with AHIMS and are not a definitive list of all Aboriginal sites



within an area, as there is potential for sites to exist within areas that have not previously been subject to archaeological assessment.

Field investigations for this report included a pedestrian survey. The results are considered to be indicative of the nature and extent of Aboriginal archaeological remains within the study area, but it should be noted that Aboriginal objects and sites which have not been identified as part of this assessment may be present within the wider area.

It is recognised that Aboriginal people are the primary determinants of the significance of their cultural heritage, and as such, Apex Archaeology have relied on the Aboriginal community to provide cultural knowledge regarding the site, where they are willing and able to share such knowledge. However, there may be occasions where RAPs are unwilling or unable to share cultural knowledge regarding the site and thus our assessment of significance relies on scientific assessment only.



2.0 ABORIGINAL CONSULTATION PROCESS

This section details the Aboriginal community consultation undertaken to assist in the heritage assessment of the study area. Aboriginal consultation in accordance with the *Aboriginal cultural heritage consultation requirements for proponents 2010* was undertaken by Apex Archaeology for this project.

Aboriginal community consultation is a requirement in order to make assessments of Aboriginal cultural values, as Aboriginal people are the primary determinants of the significance of their cultural heritage and therefore Apex Archaeology cannot make a determination on the cultural significance without the input of the RAPs. Aboriginal people often have a strong connection to their Country, and to their ancestors, both past and present.

Material evidence of past Aboriginal occupation of an area is a tangible link to the intangible traditions, lore, customs, beliefs and history. These intangible values provide a sense of belonging for Aboriginal people, and cultural heritage and cultural practices are kept alive through being incorporated into everyday life, which helps maintain a connection to the past and to the present. It is a vital part of the identity of Aboriginal people.

Therefore, it is important that Aboriginal people are afforded the opportunity to understand, comment on and have input into projects that may impact areas which may be culturally sensitive, or damage items of cultural significance. The process of Aboriginal community consultation provides this opportunity, and this ACHAR details the results of the consultation undertaken for this project.

2.1 THE CONSULTATION PROCESS

The *Aboriginal cultural heritage consultation requirements for proponents 2010* provide the process for undertaking consultation with the Aboriginal community. This process includes identification, registration, engagement and consultation with those Aboriginal people who may have cultural knowledge which is relevant to determining the cultural significance of Aboriginal objects and places which may be within the study area.

The Consultation Guidelines detail a number of stages for consultation, as follows:

- Identification of those people who should be consulted for the project
- Inviting Aboriginal people to register their interest in being consulted for the project
- Providing information regarding the nature and scope of the project to the Aboriginal people who have registered an interest in being consulted – the registered Aboriginal parties (RAPs)
- Providing opportunities for RAPs to comment on the proposed methodology for cultural heritage consultation



- Presenting information about the potential impacts of the proposed development for the RAPs to comment on
- Providing opportunities for RAPs to comment on the cultural significance of the proposed development area
- Providing opportunities for RAPs to comment on the draft reports detailing the results of the archaeological and cultural assessments for the project

2.2 STAGE 1 CONSULTATION: COMMENCEMENT

Stage 1 requires a list of Aboriginal people who may have cultural knowledge relevant to the area to be prepared from several sources of information. The first step requires enquiries to be made of certain statutory bodies regarding whether they are aware of Aboriginal people or organisations that may have an interest in the study area, and their contact details. Any Aboriginal people or organisations identified in this step must be contacted and invited to register an interest in the project. In addition, a notification must be placed in local print media requesting Aboriginal people or organisations to register their interest in the project. A list of those who register an interest must be compiled. A minimum of 14 days from the date of the letter or newspaper advertisement must be allowed for registrations of interest.

As a result of the Stage 1 activities, a list of Aboriginal people who wish to be consulted for the project is developed. These Aboriginal people become the registered Aboriginal parties – the RAPs – for the project.

Letters requesting the details of Aboriginal people who may hold cultural knowledge relevant to the study area and who may wish to be consulted for the project were sent to several statutory agencies on 08 December 2023. Copies of these letters and responses are attached in Appendix B. These Step 1 letters were sent to the following agencies:

- Heritage NSW
- Local Land Services (LLS)
- Central Coast Council (CCC)
- Darkinjung Local Aboriginal Land Council (DLALC)
- Office of the Registrar, Aboriginal Land Rights Act 1983 (NSW) (ORALRA)
- Native Title Services Corp (NTSCorp)

Responses were received from Heritage NSW, LLS, ORALRA and DLALC. Heritage NSW provided a list of Aboriginal people and organisations, ORALRA advised to contact the Worimi Conservation Lands, and to contact the DLALC regarding a contact list for Aboriginal communities. The CCC advised to contact DLALC, and the Guringai Tribal Link Aboriginal Corporation. DLALC emailed to express an interest in registering for the project. The organisations provided by the agencies were invited to participate in consultation for the project.



An online search of the National Native Title Tribunal (NNTT) did not identify any Native Title Applications or Native Title Registrations over the study area.

The Aboriginal people and organisations identified during this initial stage were contacted via letter (email if provided or via post if no email address given) on 8 January 2024, inviting them to register an interest in the project. Registrations were accepted until 22 January 2024. This is Step 2 of Stage 1 of consultation. Copies of these letters are attached in Appendix C.

In addition, an online advertisement was placed in the Daily Telegraph on 8 January 2024, inviting registrations of interest from people who may have cultural knowledge of the project area. A copy of the advertisement is attached in Appendix D.

A total of twelve Aboriginal people and organisations registered an interest in being consulted for the project. The following list comprises the registered Aboriginal parties (RAPs) for the project:

- Darkinjung Local Aboriginal Land Council (DLALC)
- A1 Indigenous Services
- Amanda Hickey Cultural Services
- Awabakal Traditional Owners Aboriginal Corporation
- Awabakal and Guringai Pty Ltd
- Corroboree Aboriginal Corporation
- Gomeroy Consultation
- Gunjeewong Cultural Heritage
- Kevin Duncan
- Thomas Dahlstrom
- Trudy Smith
- Widescope Indigenous Group

2.3 STAGE 2 & 3 CONSULTATION: PRESENTATION AND GATHERING OF INFORMATION

During Stage 2, information about the proposed project is provided to the RAPs, including location, scale, proposed development plans, timeframes, methodologies and any other relevant details relating to the project. This information can be provided in writing or at a meeting (or both), and an opportunity for the RAPs to visit the site may also be provided.

During Stage 3, RAPs are invited to share information about the cultural significance of the study area, which can assist in the assessment of the cultural significance of the Aboriginal objects and/or places within the study area. The cultural heritage assessment informs and integrates with the scientific assessment of significance and therefore can assist in the development of mitigation and management measures for the project. A methodology detailing how this information will be gathered must be provided to the RAPs for comment and a minimum of 28 days must be allowed for responses to be received. Any feedback must be considered and implemented as appropriate into the methodology.



Stage 2 and 3 can be undertaken concurrently. The information about the project and the methodology for seeking cultural knowledge can be provided in the same written documentation or at the same meeting.

Details of the proposed project and the proposed methodology for undertaking the cultural heritage and archaeological assessments for the project were provided in writing to each of the RAPs on 23 January 2024. Comments were accepted until 20 February 2024. Responses were received from the following Groups and their emails are included in Appendix E. Their responses noted verbatim in Table 1:

- A1 Indigenous Services
- Corroboree Corporation
- Darkinjung Local Aboriginal Land Council
- Kevin Duncan

Table 1: RAP responses to Information and methodology document.

RAP	RAP Response	Apex Archaeology Response
A1 Indigenous Services	I have reviewed the attachment and support the document detailing the project information and the Methodology.	Noted with thanks.
Corroboree Corporation	We agree with methods.	Noted with thanks.
Darkinjung Local Aboriginal Land Council	Thanks for sending this through. I look forward to working together on this.	Noted with thanks
Kevin Duncan	Thank you for the update for the proposed new School at Gavenlock Road Tuggerah. I have read the Methodology for the project and I have agreed to the methodology process. I would like to be a part of any future ground work proposed.	Noted with thanks. Rebecca Braynt from Apex Archaeology also replied to Kevin that we have noted he would like to be involved in field work.

No other comments were received from any of the other RAPs for the project, and no specific cultural information pertaining to the study area was received from any of the RAPs for the project during this stage of consultation.

2.4 STAGE 4: REVIEW OF DRAFT REPORT

Stage 4 sees the preparation of the draft ACHAR, which details the results of the cultural heritage assessment. The draft is provided to the RAPs for their review and comment. A minimum of 28 days to comment on the ACHAR must be allowed. All comments must be addressed in the final document and the proponent's response



to RAP comments must be included. Copies of any submissions received from RAPs must be included in the final ACHAR.

The report was provided to all RAPs on 18 April 2024. No comments were received from any of the RAPs for the project.

Consultation with the Aboriginal community for this project has been conducted in accordance with the ACHCRs. A log of all correspondence is presented in Appendix A of this ACHAR.



3.0 SUMMARY AND ANALYSIS OF BACKGROUND INFORMATION

This section presents information about both the physical and cultural landscape in which the study area is located, as well as previous archaeological and ethnohistorical studies, to provide context and background to the existing knowledge of Aboriginal culture in the area.

3.1 DESCRIPTION OF THE STUDY AREA

The study area is located at 84 Gavenlock Road, Mardi, which is situated approximately 4 km west of Tuggerah Lake that opens up to the Pacific Ocean (Figure 1). The study area is approximately 20 km northeast of the Gosford CBD and about 100 km north of the Sydney CBD. It is legally referred to as Lot 9 Section 4 DP 3368 and is approximately 133,053 m² in size. The study area is bound by Gavenlock Road to the east, residential lots to the south, Keefers Glen to the west, and residential lots and a wetland area to the north.

3.2 EXISTING ENVIRONMENT

The study area is located within the geological structure known as the Sydney Basin, which is roughly bounded by the Great Dividing Range to the west, the coast to the east, Newcastle to the north, and Durras near Batemans Bay, to the south. The western portion of the current study area is within the coastal sandstone foothills that slope down eastwards onto the low-lying wetlands that are within the eastern and northern portions of the study area. This landscape then extends eastward towards Tuggerah Lake that borders the coast and is linked to the ocean through a tidal channel called 'The Entrance', at the southern end of the lake. The Wyong River to the north of the study area and Ourimbah Creek to the south are fed by numerous creeks and tributaries. These two water courses are the largest water catchments that contribute to the Tuggerah Lakes system (Wyong Council 1994).

3.2.1 GEOLOGY, TOPOGRAPHY AND SOILS

The underlying geology of the western portion of the study area is mapped as being within the Narrabeen Group that comprises quartz-lithic to quartzose sandstone conglomerate mudstone, siltstone, and rare coal. The eastern portion of the study area is within a Holocene floodplain: silt, fluvial sand, and clay. It is important to note that the residential areas to the north and south of the study area are outlined on the geological mapped as being built on introduced fill (Troedson 2016). This is most likely due to the area between at the foothills and the area being boggy and highly susceptible to flooding.

The majority of the study area is mapped as being within the Woodburys Bridge soil landscape which comprises gently undulating rises to rolling hills that maybe capped by sandstone on the crests of steeper hills. The soils within this landscape can be more than >150 cm in depth. The A1 horizon is a dull yellowish brown to brownish black fine sandy loam. This overlies a shallow A2 horizon subsoil which can be a dull yellowish-brown light sandy clay loam. A small section along the southern boundary



within the steeper portion of the study area is mapped as being within the Erina soil landscape which also contains moderately-deep to deep sandy soils (100 to > 200 cm) that vary in colour and can be brown, yellowish brown, or pale grey within the foot slopes.

The eastern portion of the study area where the wetlands and school oval are situated is mapped as being within the Wyong soil landscape. This topography is characterised by broad poorly drained deltaic floodplains and alluvial flats. The soils can be over 200 cm in depth and comprise greyish yellow brown to brownish black loam to silty clay.

3.2.2 FLORA AND FAUNA

The original vegetation within the study area before the European colonisation would have consisted of tall open-forest. Common species of the open-forest include blackbutt (*Eucalyptus pilularis*), grey ironbark (*Eucalyptus. Paniculata*) and forest oak (*Allocasuarina torulosa*). Turpentine gum (*Syncarpia glomulifera*) and Sydney blue gum (*Eucalyptus saligna*). The low-lying floodplain area would have comprised swamp mahogany (*Eucalyptus. robusta*) and swamp oak (*Casuarina glauca*), Prickly-leaved paper bark (*Melaleuca styphelioides*). Grasses such as the Kangaro grass (*Themeda australis*) would have also been present (NSW Government SEED 2022).

Animals within the study area and surrounds would have included possums, snakes, lizards, birds, and fish, shellfish, crustaceans, molluscs and octopus from the nearby coastal shoreline.

Many of these plants, trees and animals have been documented as resources used by Aboriginal people to fulfill dietary needs, supply raw material for tools and implements, and used for medicinal and ceremonial purposes. For example, the various Eucalypts provided wood for shields, canoes and coolamons, while the soft stringy bark from the Melaleuca trees was used for bedding, and to wrap the deceased in burial practices. The fur from possums was sewn together using a needle made from animal bones and thread made from the sinew of animal's muscles. (Attenbrow 2010; Clarke 2012).

3.2.3 HYDROLOGY

There are no creek or drainage lines mapped as being within, or close to, the current study area. However, there is a former dam in the northwest of the study area that most probably would have been excavated around an existing drainage line.

The closest substantial freshwater course would most probably have been the Wyong River. It is approximately 1.5 km to the north of the study area and would be classified as a fourth order watercourse that is fed by a number of smaller tributaries. However, as the Wyong River drains into the saline Tuggerah Lake a further 3 km to the east, it is not known if the water would have been drinkable.

Watercourse classification ranges from first order through to fourth order (and above), with first order being the lowest, ie a minor creek or ephemeral watercourses, and fourth or above being a large watercourse such as a river (Figure 4), as defined by the Department of Planning and Environment (DPE). This classification is recognised as a factor which helps the development of predictive modelling in Aboriginal archaeology in NSW and has been used extensively across the Cumberland Plain. However, it is not necessarily applicable to the coastal and sandstone areas. Although the Wyong River would be classified as a fourth order watercourse, the sections closest to the study area were probably quite saline.

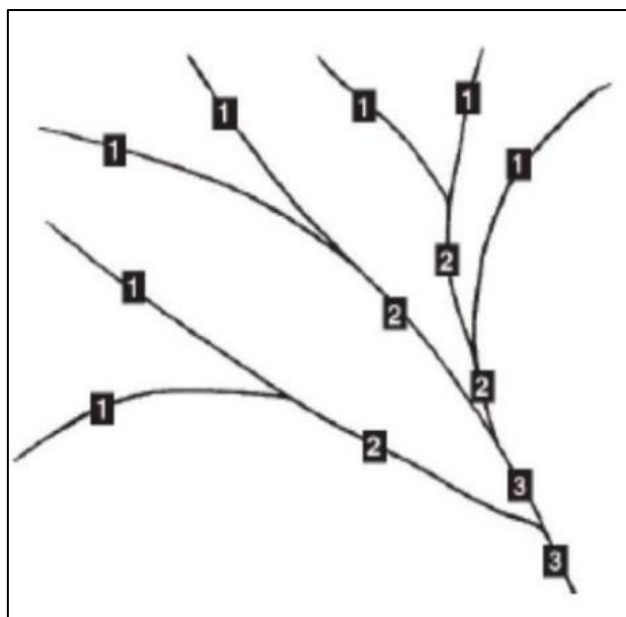


Figure 4: The Strahler system (Source: Department of Planning and Environment 2016).

3.3 MATERIAL EVIDENCE OF ABORIGINAL LAND USE

3.3.1 AHIMS

An extensive 4 km search centred on the study area was conducted of the AHIMS Register on 22 January 2024. A total of 11 sites were located within the search area, with nine sites registered as 'valid', one site listed as 'not a site', and one site listed as 'destroyed' (Figure 5). Sites can be recorded as a particular site type: closed or open. For the nine valid sites in the search area, all are registered as open sites, meaning they are not within rockshelters. Sites are also recorded with one or more of a set of twenty-two site features specified by AHIMS. There are a total of eight sites with the feature 'artefact' that could either be isolated stone artefacts, or stone artefact scatters. There is one 'stone quarry', and one 'restricted site'. The 'restricted site' was confirmed by Heritage NSW in March 2024 as not being within the lot boundary of the study area, or within 50 m of it. There is also one 'potential archaeological deposit' (PAD). However, this has been listed as 'not a site' (Table 2).



Table 2: Summary of registered Aboriginal heritage sites on AHIMS with 1km of the study area

Site ID	Site Name	Context/ Site features	Status
45-3-3393	Mardi to Mangrove 3	Open/Artefact	Destroyed
45-3-3628	Restriction applied. Please contact ahims@environment.nsw.gov.au.	Unknown	Valid
45-3-3194	WP-4	Open/Artefact : -	Valid
45-3-3183	WP3	Open/Artefact : -	Valid
45-3-1144	Tuggerah;	Open/Artefact : -	Valid
45-3-0816	Tangy Dangy	Open/ Stone Quarry: -	Valid
45-3-3184	WP2	Open/Artefact : 1	Valid
45-3-3576	MARDI TO MANGROVE	Open/Artefact : -	Valid
45-3-3181	WP1	Open/Artefact	Valid
45-3-3384	Tuggerah PAD 1	Open/ (PAD) : -	Not a Site
45-3-1108	Tuggerah;	Open/Artefact : -	Valid



Figure 5: AHIMS sites within a 5km area of the study area.

Figure not included in public report



3.3.2 PREVIOUS ARCHAEOLOGICAL ASSESSMENT

A number of previous archaeological assessments and research projects have been undertaken in the Central Coast region and within the vicinity of the current study area (Table 3). These investigations have demonstrated that the region has been used by Aboriginal people for at least the last 11,000 years. The combination of geology and climate within the region created varied landscapes with numerous rivers and creeks that contained a plethora of natural resources that were used in their daily lives, and would also have played a significant part in economic exchange systems and ceremonial lives of Aboriginal people. Remnants of these past lives is still seen in the archaeological left behind, such as rock engravings, grinding grooves, shell middens and stone artefacts.

Research undertaken by Attenbrow et al (2017), and Attenbrow and Kononenko (2017) show that ground-edged artefacts such as hatchets, Bulga knives and hammer/ponders also had a variety of uses. The rock material from which they were made was sourced from local basalt from the Peats Ridge to Popran Creek area, as well as from the Nepean River, Hunter Valley, South Coast Region and west of the Blue Mountains. Previous predictive models in relation to the Tuggerah area proposed that evidence of past Aboriginal occupation would be found in rock shelters, at the base of foothills, in flat elevated areas bordering well-resourced swampy areas, and in the sand dunes in proximity to Tuggerah Lakes. However, the archaeological salvage excavation undertaken by Therin, that Kuskie (2009) referred to, resulted in a large number of artefacts been recovered in an area bordering a wetland and in close proximity to the Wyong River. Therin's results demonstrated that caution must be applied when assessing a flood plain's potential to contain archaeological material based on surface inspections, as the depositional context of the sediment bordering the river is not well known.

These studies and assessments are discussed in more detail in the Apex Archaeology (2024) Archaeological Report attached to this ACHA.

Table 3: Previous heritage assessments undertaken by archaeological consultants in the region

Consultant/Researcher	Date	Sites Identified/Type of Assessment or Study	Region
Patricia Vinnicombe	1980	Predictive model	Gosford And Wyong
Jo McDonald Cultural Heritage Management	2001	None	Woy Woy
Val Attenbrow	2003	Discussion of previous sites	Mangrove Mountain
AHMS	2007	One	Gosford
Insite Heritage	2011	None	Koolewong
AHMS	2011	2 PADs	Terrigal
RPS Harper Somers O'Sullivan	2011	None	Somersby, near Gosford
Attenbrow and Kononenko	2017	Usewear and residue analysis undertaken on ground-edged artefacts	Central Coast region
Extent Heritage Advisors	2019	None	Gosford



Consultant/Researcher	Date	Sites Identified/Type of Assessment or Study	Region
Heritage Now	2020	1site identified	Kariong
Archaeological Management and Consulting Group	2020	None (1 previously identified)	Mann Street, Gosford
Kleinfelder	2022	None	Empire Bay

3.4 ETHNOHISTORY

Ethnohistorical evidence is based on the reports of colonisers and do not tend to include the Aboriginal perspective, leading to a Eurocentric view of Aboriginality. Additionally, historical records can be contradictory and incomplete regarding the exact tribal boundaries and locations of ceremonial or domiciliary activities of Aboriginal people pre-contact within the Central Coast region. Boot (2002:58) notes:

The problem associated with ethnohistoric documents include their tendency to record unusual, rather than everyday events, and their focus on religious behaviour to the exclusion of woman and children (Attenbrow 1976:34; Sullivan 1983:12.4).

According to the Darkinjung Local Aboriginal Land Council (2022) the traditional boundaries of Darkinjung (Darkinyung) land extend from the Hawkesbury River in the south, to Lake Macquarie in the north, the McDonald River and Wollombi up to Mt Yengo in the west, and the Pacific Ocean in the east. Although it is not possible to determine how long these boundaries have existed, relatively recent research undertaken by the Australian Museum in conjunction with the University of New England shows the movement of ground-edged stone artefacts from a common Central Coast geological source within these areas. Attenbrow et al. 2017 published some of their findings from a long-term research project that matched Aboriginal ground-edged atone artefacts, such as hatchets (axes) found within the Sydney Basin to their original geological source.

The results showed that a number of ground-edged artefacts found along the coastal areas of the Central Coast matched the Peats Ridge to Popran Creek basalt within the Mangrove Mountain area that is within the traditional lands of the Darkinjung people. Additionally, ground-edged artefacts found within the Mangrove Mountain area were found to match a cobble source along the banks of the Nepean-Hawkesbury River in the Castlereagh area of western Sydney. As noted by Attenbrow (2017:181), historical accounts documented by members of the First Fleet noted that Governor Phillip embarked on a trip along the Hawkesbury-Nepean River where he spoke with Aboriginal people collecting stones to make hatchets. Analysis of the reports by linguists in 2008 concluded that the people Governor Phillip conversed with on the banks of the Hawkesbury were Darkinjung speakers who lived in what is now the Central Coast region (Attenbrow 2017:181).



A review of numerous historical maps and documents published since the late 1800s by white settlers regarding the original Aboriginal inhabitants of the Central Coast area shows there are contradictory theories on the names of the peoples who lived here at the time of contact. Over the past eight years considerable discussion has centred on the use of name Guringai in connection to their traditional boundaries. According to Laurie Bimson (2022), a traditional owner and director of the Guringai Tribal Link Aboriginal Corporation, Guringai Country is proposed to extend from Lane Cove River in Sydney to Lake Macquarie. In 2015, the Aboriginal Heritage Office (AHO) that is based in Sydney and supports a number of local government councils issued a document 'Filling a Void'. This was in response to numerous inquiries they had received by local councils and the general public regarding the historical use of the word 'Guringai'. The AHO notes that regarding the Sydney area, original documents from those on the First Fleet recognised that there was a distinction in language or dialect between the Aboriginal people of the coast, inland and those further north of Broken Bay, but there was no record of the word Kuring-gai in the early accounts.

The AHO outlined that John Fraser's 1892 book was the first to state that the 'Kuringai' was a 'tribe' that stretched from the Macleay River (Northern Tablelands and Mid North Coast) to south of Sydney. It was suggested that it is possible that Fraser was influenced by the name of the Gringai tribe of the Hunter River district and 'kuri' for men. Variations of this name were then subsequently used by a number of researchers. In the 1960s, linguist Arthur Capel reanalysed the south-central coastline and identified that Kuringgai (Guringai) was spoken on the north side of Port Jackson and extended to Tuggerah Lakes. Helen Brayshaw, a consultant archaeologist who completed her PhD on the Aboriginal people of the Hunter River, district also noted that the 'Gringai' lived near the junction of the Paterson and Allyn Rivers in the Hunter region but refers to the 'Kuringgai', following Fraser and Capel, as living in both north and south of Broken Bay.

As noted by the AHO, other researchers did not support the existence of the Guringai's traditional boundaries to extend into the Sydney and Central Coast areas. For example, Scott and Bennett in 1873 referred to the 'Gringai tribe' as a sub-branch of numerous native people that once inhabited the lower portions of the Hunter and Karuah valleys. Additionally, entomologist, ethnologist and anthropologist Norman Tindale who produced the Australia-wide tribal boundaries map showing the distribution of the Aboriginal tribes of Australia removed Fraser's 'Kuringgai' geographic range entirely. More recently an article published in the Koori Mail (December 4, 2019) by Mr Bob Syron, a Registered Aboriginal Owner of Worimi Guringai Lands, stated that his language group, Guringay/Gringai has been extensively recorded from the Port Stephens, Barrington and Dungog areas.

Although there is conflicting historical documentation of the people who once inhabited the Tuggerah area, it is apparent that a thriving Aboriginal population inhabited the area prior to colonisation, and the arrival of European settlers



dramatically and negatively impacted the Aboriginal people of the Central Coast Region. Dyal (1980) noted that in 1828 a magistrate had estimated that there were 65 Aboriginal people within the Central Coast area, with specific mention of groups located on Tuggerah Beach and Wyong. In 1824 Gosford settler, John Mann, went with a party of local tribesman to attend the annual 'grand corroboree' of the Central Coast and Wollombi tribes, 'at the junction of Wyong Creek with Tuggerah Lake'.

In general, it is believed that Aboriginal society was constructed of a hierarchy of social levels and groups, with fluid boundaries (Peterson 1976). The smallest group comprising a family of a man and his wife/wives, children and some grandparents, referred to as a 'clan' (Attenbrow 2010). These clans formed bands, which were small groups of several families who worked together for hunting and gathering purposes (Attenbrow 2010). Regional networks were formed containing a number of bands that generally shared a common language dialect and/or had a belief in a common ancestor. Networks would come together for specific ceremonial purposes.

The traditional lifestyles of Aboriginal groups depended largely on the environment in which they lived. Whilst coastal groups utilised marine and estuarine resources, hinterland groups relied on freshwater and terrestrial animals and plants. Tuggerah is within a hinterland/coastal region which would have had an abundance of small animals such as wallabies, possums, birds and reptiles. Fish, shellfish and crustaceans would probably have also been sourced from the sea coast to the east. These animals, along with a variety of plant resources, were available year-round within the Central Coast region and would have formed part of the Aboriginal peoples' diet.



4.0 ABORIGINAL CULTURAL HERITAGE SIGNIFICANCE ASSESSMENT

4.1 INTRODUCTION

Cultural or social significance can be defined as relating to the spiritual, traditional, historical and/or contemporary associations and values attached to a place or objects by Aboriginal people. Further, the tangible and intangible evidence of their cultural heritage is valued by Aboriginal people as it forms an essential part of their cultural identity and their connection to Country (DECCW 2010a).

The *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW 2010a) acknowledge that:

- Aboriginal people have the right to maintain their culture, language, knowledge and identity
- Aboriginal people 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

Undertaking consultation with Aboriginal people ensures that potential harm to Aboriginal objects and places from proposed developments is identified and mitigation measures developed early in the planning process.

4.2 CRITERIA

The Burra Charter is considered an appropriate framework for the assessment of cultural heritage, which can be made based on the following assessment criteria:

- **Social value:** Also referred to as cultural value, this criterion considers the spiritual, traditional, historical or contemporary associations an area or place has for Aboriginal people
- **Historic value:** the relationship between a place and people, events, phases or activities of importance to the Aboriginal community
- **Scientific value:** assessment under this criterion considered the ability of a landscape, place, area or object to inform scientific research and/or analysis and to assist in answering research questions
- **Aesthetic value:** the ability of a place, area, landscape or object to demonstrate aesthetic characteristics, or possess creative or technical values

These should be graded so as to allow the significance to be described and compared as high, moderate or low.

4.3 SIGNIFICANCE ASSESSMENT

SOCIAL VALUE

The Aboriginal community are best placed to make a determination of the social or cultural value of the study areas. No specific comments regarding the social value



of the areas to Aboriginal people have been received from the RAPs to date, although it is noted that all areas with evidence of Aboriginal occupation hold significance to Aboriginal people.

HISTORIC VALUE

No previously recorded sites are located within the study area. The site is not known to have specific historic value to Aboriginal people.

SCIENTIFIC VALUE

No archaeological material was identified within the study area and it has been heavily disturbed by previous land use activities. It was not considered to hold value under this criterion.

AESTHETIC VALUE

Generally, aesthetic value is determined by the response evoked by a setting. The study area is not considered to have value under this criterion.

4.4 CULTURAL SIGNIFICANCE ASSESSMENT

Generally, all Aboriginal sites are of high significance and importance to the Aboriginal community, both locally and more broadly. The Aboriginal social or cultural value of the study area can only be determined by the Aboriginal community and to date, no comments have been received regarding the specific social significance of the study area.

4.5 STATEMENT OF ARCHAEOLOGICAL SIGNIFICANCE

The study area located at 84 Gavenlock Road, Mardi, NSW, is considered to have low Aboriginal cultural significance due to the lack of the cultural material present within the study area. It is acknowledged that the area was inhabited by Aboriginal people in the past and the evidence of this occupation existed within the wider area, even if it has subsequently been disturbed.



5.0 AVOIDING AND MINIMISING HARM

5.1 PROPOSED ACTIVITY

The proposed works, as shown in Figure 3, will involve the demolition of existing building structures; removal of existing on-site vegetation then the subsequent construction of the Eileen O'Connor Catholic School within the northwestern section of the study area. These activities, along with the implementation of services such as water, electricity and telecommunications are expected to result in subsurface excavations and modification to the natural landscape. There is also a probability that excavated soil will be removed from the study area or redeposited within it, and other fill may be introduced to the site.

5.2 JUSTIFICATION

The proposed works are for the construction of new Eileen O'Connor Catholic School. This is a special needs school that will provide an inclusive model of education for students with a disability of autism and/or moderate intellectual disability. The new Eileen O'Connor Catholic School will also help meet the demand for disability support which is growing state-wide at four times the rate of school enrolments (Catholic Schools Broken Bay 2023)

5.3 AVOIDANCE OF HARM

The study area does not contain Aboriginal archaeological evidence and thus no harm avoidance or mitigation is necessary.

5.4 ECOLOGICALLY SUSTAINABLE DEVELOPMENT

It is a requirement of Section 2A(2) of the NPW Act to apply the principles of Ecologically Sustainable Development (ESD) when considering any impact to Aboriginal objects and places. ESD integrates economic and environmental considerations, which includes cultural heritage, into decision-making processes. In general, ESD can be achieved through consideration and implementation of two key principles, being intergenerational equity and the precautionary principle.

Intergenerational equity refers to the present generation having consideration for the health, diversity and productivity of the environment for those generations to come. In terms of Aboriginal cultural heritage, this relates to cumulative impacts to Aboriginal objects and places within a region. Intergenerational equity therefore relies on the understanding that a reduction in the number of Aboriginal objects and places within a region results in fewer opportunities for Aboriginal people to access their cultural heritage in the future. Thus, it is essential to understand what comprises the Aboriginal heritage resource, both known and potential, when assessing intergenerational equity within a region.

The precautionary principle relates to threats of serious or irreversible environmental damage, and that lack of scientific certainty regarding the degree of potential damage should not be a reason to postpone adequate reasonable measures to



prevent harm to the environment. Regarding Aboriginal cultural heritage, the precautionary principle relates to where a proposed development may seriously or irreversibly impact Aboriginal objects or places, or their significance; and where there may be uncertainty relating to the integrity, rarity or representativeness of Aboriginal cultural values. The Code of Practice outlines that a precautionary approach should be taken to avoid or reduce damage to Aboriginal objects or places, with cost-effective measures implemented wherever possible. Additionally, a cumulative impact assessment should be completed to determine how the proposed development would impact the cultural resource in the wider region.

Consideration should be given to the significance of the sites present within an area, and whether they are able to transmit cultural information to future generations, or to act as teaching aids.

The study area is assessed as being of low cultural significance, based on the information available at this stage.

5.4.1 INTERGENERATIONAL EQUITY

As no Aboriginal cultural material was identified within the study area, it is considered that the impact of the development of this site would be negligible with regards to the ongoing transmission of cultural knowledge to future generations. The proposal is not considered to impact on intergenerational equity.

5.4.2 CUMULATIVE IMPACTS

The cumulative impact of the project on the Aboriginal cultural resource must be considered as part of an assessment, and managed appropriately and sensitively. Avoidance of impact is the best practice approach wherever possible, particularly for sites that are intact, contain high numbers of artefacts, or are considered significant to the community.

In terms of cumulative impact, the site does not contain evidence of Aboriginal occupation. Overall, it is considered that the proposal has negligible impact on the Aboriginal cultural heritage of the region.

5.5 ABORIGINAL COMMUNITY INPUT

The RAPs have been consulted as part of this project, and their input, where received, has been incorporated into the report and recommendations.



6.0 RECOMMENDATIONS

The following recommendations are made on the basis of:

- The statutory requirements of the NP&W Act 1974;
- The requirements of Heritage NSW;
- The results of the cultural and archaeological assessment;
- An assessment of the likely impacts of the proposed development; and
- The interests of the registered Aboriginal stakeholders and the cultural heritage record.

It was found that:

- There were no previously registered sites within the study area.
- No surface artefacts were identified during the survey.
- No areas considered to have potential for subsurface archaeological deposits were identified within the study area.
- The area was considered to be disturbed throughout due to historical clearance, land use practices and development.
- The site is not considered to contain potential for Aboriginal cultural material to be present.

The following recommendations have been made.

RECOMMENDATION 1: NO FURTHER ARCHAEOLOGICAL ASSESSMENT REQUIRED

This report details the archaeological potential of the site, which has been assessed as negligible. No further archaeological assessment is required for the site prior to the commencement of proposed development activities.

RECOMMENDATION 2: INSTALLATION OF ACKNOWLEDGEMENT

It is recommended that consideration is given to the installation of an acknowledgement to the traditional Aboriginal owners of the land. This could be addressed in the future through the Connecting to Country component of the project.

RECOMMENDATION 3: DEVELOPMENT BOUNDARIES

The proposed development works must be contained within the assessed boundaries for this project. If there is any alteration to the boundaries of the proposed development to include areas not assessed as part of this archaeological investigation, further investigation of those areas should be completed to assist in managing Aboriginal objects and places which may be present in an appropriate manner.

RECOMMENDATION 4: STOP WORK PROVISION

Should unanticipated Aboriginal archaeological material be encountered during site works, all work must cease in the vicinity of the find and an archaeologist contacted to make an assessment of the find and to advise on the course of action to be taken.



Further archaeological assessment and Aboriginal community consultation may be required prior to the recommencement of works. Any objects confirmed to be Aboriginal in origin must be reported to Heritage NSW.

In the unlikely event that suspected human remains are identified during construction works, all activity in the vicinity of the find must cease immediately and the find protected from harm or damage. The NSW Police and the Coroner's Office must be notified immediately. If the finds are confirmed to be human and of Aboriginal origin, further assessment by an archaeologist experienced in the assessment of human remains and consultation with both Heritage NSW and the RAPs for the project would be required.

RECOMMENDATION 5: REPORTING

One digital copy of this report should be forwarded to Heritage NSW for inclusion on the Aboriginal Heritage Information Management System (AHIMS).

One copy of this report should be forwarded to each of the 12 registered Aboriginal stakeholders for the project.



7.0 BIBLIOGRAPHY

Aboriginal Heritage Office, 2015. *Filling a Void: a review of the historical context for the use of the word 'Guringai'*. Aboriginal Heritage Office.

Advitech, 2013. Aboriginal Archaeological Salvage Excavation. Report to Wyong Shire Council.

Archaeological Management & Consulting Group. 2020. *Final Archaeological Report: ATO Development 38 Mann Street, Gosford NSW*. Report to BLOC Pty Ltd.

Archaeological Management & Consulting Group. 2020. *Aboriginal Cultural Heritage Assessment Report Lot 11 DP 1250131, Lots 2-7 DP 14761 and Lot 469 DP821073 Central Coast Quarter 26-32 Mann Street, Gosford*. Report to SH Gosford Residential Pty Ltd

Archaeological and Heritage Management Solutions. 2011. *Aboriginal and Historical Archaeological and Cultural Heritage Assessment: 5 Lands Coastal Walkway*. Report to Andrews Neil Urban Design Group.

Attenbrow, V. 2003. Habitation and land use patterns in the Upper Mangrove Creek catchment, New South Wales central coast, Australia. *Australian Archaeology*, Vol 57 (1):20-31.

Attenbrow, V. 2010. *Sydney's Aboriginal Past: Investigating the archaeological and historical records*. UNSW Press, Sydney (Second Edition).

Attenbrow, V., Corkill, T., Pogson, R., Sutherland, L., Grave, P. 2017. 'Non-destructive Provenancing of Ground-Edged Mafic Artifacts: A Holocene Case Study from the Sydney Basin, Australia'. *Journal of Field Archaeology* 42(3): 173-186.

Attenbrow, V. and Kononenko, N. 2017. *Microscopic Revelations: The Forms and Multi Uses of Ground-edged Artefacts of the New South Wales Central Coast*. Australia. Technical Reports of the Australian Museum

Attenbrow, V., Corkill, T., Pogson, R., Sutherland, L. and Grave, P. 2017. *Non-destructive Provenancing of Ground-Edged Mafic Artifacts: A Holocene Case Study from the Sydney Basin, Australia*. *Journal of Field Archaeology* 42 (3):173-186.

Boot, P. 2002. *Didthul, Bhundoo, Gulaga and Wadbilliga: An Archaeological Study of the Aboriginals of the New South Wales South Coast Hinterland*. Thesis submitted for the degree of Doctor of Philosophy of the Australian National University.

Bowdler, S. 1970. *Bass Point: The Excavation of a South East Australian Shell Midden Showing Cultural and Economic Change*. Unpublished BA (Hons) Thesis, University of Sydney, Sydney.



Bowdler, JM., Johnston, H., Olley JM., Prescott, JR., Roberts, RG., Shawcross, W and Spooner, N., 2003. 'New ages for human occupation and climactic change at Lake Mungo, Australia.' *Nature* Vol 421:30, pp.837-840.

Brimson, L., 2022. *My Story . Guringai Aboriginal Stories*. Accessed February 2023 at <https://www.guringaitours.com.au/about/>

Catholic Schools Broken Bay, 2023. *Eileen O'Connor Catholic School*. Online resource, accessed from https://issuu.com/catholicschoolsbb/docs/business_proposal_for_eileen_oconnor_a_4_oct_2023_f

Corkill, T., 2005. "Sourcing Stone from the Sydney Region: A Hatchet Job." *Australian Archaeology* 60: 41–50.

Clarkson, C., Smith, M., Marwick, B., Fullagar, R., Wallis, L., Faulkner, P., Manne, T., Hayes, E., Roberts, R., Jacobs, Z., Carah, X., Lowe, K., Matthews, J and Florin, S., 2015. The archaeology, chronology and stratigraphy of Madjedbebe (Malakunanja II): A site in northern Australia with early occupation. *Journal of Human Evolution*. 83:46-64

DECCW 2010a. *Aboriginal cultural heritage consultation requirements for proponents 2010*. DECCW, Sydney South.

DECCW 2010b. *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. DECCW, Sydney South.

DECCW 2010c. *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales*. DECCW, Sydney South.

Dyall, L., 1980. *Report on Aboriginal Relics at Proposed Site for Power Station at Chittaway Point, N.S.W.* Report to National Parks and Wildlife Services.

Eades, D.K., 1976. *The Dharawal and Dhurga Languages of the NSW South Coast*, Australian institute of Aboriginal Studies, ANU, Canberra.

Fitzhardinge, L. F., 1799. *Sydney's First Four Years, A Narrative of the Expedition to Botany Bay and a Complete Account of the settlement of Port Jackson 1788 – 1791 by Captain Watkin Tench of the Marines*. Library of Australian History: Sydney.

Grant, J., 1801. Extract from Ships journal in letter from Governor King to Duke of Portland. In *Historical Records of New South Wales*, Vol IV, Hunter and King 1800, 1801, 1802. Charles Potter, Government Printer, Facsimile Edition 1976.

Heritage Branch Department of Planning., 2009. *Assessing Significance for Historical Archaeological Sites and 'Relics'*. Heritage Council of NSW, Sydney.

Heritage Now., 2020. *Lot 512 and 513 DP727686 Woy Woy Road, Kariong Aboriginal Cultural Heritage Assessment*. Report to Darkinjung Local Aboriginal Land Council



Howitt, A.W., 1904, *The Native Tribes of South-East Australia*. Macentimetresillan & Co. London.

Hughes, P & R Lampert. 1982, Prehistorical population changes in southern coastal New South Wales. In S. Bowdler (ed) *Coastal Archaeology in Eastern Australia: Proceedings of the 1980 Valla Conference on Australian Prehistory*. Pp 16-28. Occasional Papers in Prehistory 11. Department of Prehistory Research School of Pacific Studies, Australian National University, Canberra.

Insite Heritage Pty Ltd. 2011, *Aboriginal Cultural Heritage and Historical Cultural Heritage Assessment: proposed Koolewong Marina Koolewong, Central Coast, NSW*. Report to ADW Johnson on behalf of Gemsted Pty Ltd.

JoMcDonald Cultural Heritage Management.,2001. *Survey for Aboriginal Sites Bulls Hill Quarry, Woy Woy NSW*

Kleinfelder. 2022, *Aboriginal Cultural Heritage Assessment: 437 Ward Hill Road Empire Bay NSW*. Report to Barnes Property Investments Pty Ltd.

JoMcDonald Cultural Heritage Management. 2005. *Archaeological salvage excavation of site RTA-G1 109-113 George Street Parramatta*. Unpublished report to Landcom Pty Ltd.

Kuskie, P. and Kamminga, J., 2000. *Salvage of Aboriginal archaeological sites in relation to the F3 Freeway near Lenaghans Drive, Black Hill, New South Wales*. Unpublished report by Southeast Archaeology to Northern Region, Roads and Traffic Authority.

Kuskie, P., 2009. *Mardi to Mangrove Link Project: Aboriginal Heritage Impact Assessment*. Unpublished report to GHD Pty Limited.

Kohen, J.L., Stockton, E.D., and Williams, A.J. 1984, 'Shaws Creek KII rockshelter: a prehistoric occupation site in the Blue Mountains piedmont, eastern New South Wales'. *Archaeology in Oceania* 19(2):57-73.

Lampert, RJ. 1971, Coastal Aborigines of Southeastern Australia. In D.J Mulvaney and J. Golson (Eds), *Aboriginal Man and Environment in Australia*. Pp 114-132. Australian National University Press, Canberra.

McDonald J., 2005. *Archaeological Salvage Excavation of Eight Archaeological Landscapes in the Second Ponds Creek Valley Rouse Hill Development Area, NSW*. Unpublished report to Rouse Hill Infrastructure Pty Ltd and Landcom.

McDonald, J., 2008. *Dreamtime superhighway: An analysis of Sydney Basin rock art and prehistoric information exchange*. *Terra Australis*. Australian National University E Press, Canberra.

Mulvaney, J & Kamminga, J., 1999. *Prehistory of Australia*. Allen & Unwin, Crows Nest.



Nicol, G & Sewell, J., 1793. *A Complete Account of the Settlement at Port Jackson in New South Wales, Including An Accurate Description of the Situation of the Colony; of the Natives; and Of Its Natural Productions*. London.

O'Connell, J.F and Allen, J., 2004, Dating the colonization of Sahul (Pleistocene Australia-New Guinea): a review of recent research. *Journal of Archaeological Science* 31:835-853.

OEH 2011. *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*. OEH, Sydney South.

RPS Harper Somers O'Sullivan Pty Ltd., 2011. *Aboriginal and European Heritage impact Assessment for Hanson Central Coast Sand Quarry at Somersby near Gosford, NSW*. Report to Hanson Construction Materials Pty Ltd.

SHP (Sue Hodges Productions), 2019. *Central Coast Council Gosford CBD Heritage Interpretation Strategy*. Report to Central Coast Council.

Smith, M.A., 2013, *The Archaeology of Australia's Deserts*. Cambridge University Press, New York.

Stockton, ED. 1973., 'Shaws Creek Shelter: Human Displacement of Artefacts and its significance.' *Mankind* 9: 112-117

Stockton, E.D. & Holland, W.N. 1974. 'Cultural sites and their environment in the Blue Mountains.' *Archaeology and Physical Anthropology in Oceania*. 9:36-65

SHP (Sue Hodges Productions). 2019. *Central Coast Council Gosford CBD Heritage Interpretation Strategy*. Report to Central Coast Council.

Therin Archaeological Consulting, 2000. *Archaeological Survey of Woodbury Park Estate, Mardi Stage 4*. Report to Andrews Neil.

Tindale, N.B. 1974, *Aboriginal Tribes of Australia – Their Terrain, Environmental Controls, Distribution, Limits and Proper Names*. Online resource, accessed from <http://archives.samuseum.sa.gov.au/tribalmmap/index.html>

Troedson, A.L., 2016. *Central Coast Area 1:100 000 and 1:25 000, Coastal Quaternary Geology Map Series*. Geological Survey of New South Wales, Maitland. Online resource, accessed from [Central Coast Area 1:100,000 Coastal Quaternary Geology Map \(nsw.gov.au\)](http://www.nsw.gov.au/central-coast-area-1:100,000-coastal-quaternary-geology-map)

Wildthing Environmental Consultants, 2002. *Archaeological Heritage Assessment for a proposed pipeline associated with the Integrated Tourist Facility Magenta Shores*. Report to Mirvac Projects Pty Ltd.



APPENDIX A: CORRESPONDENCE LOG

23173 Tuggerah School ACHA – Consultation Log

Date	Type of Consultation	Parties Contacted	Outcome
10/12/2023	Requesting details of Aboriginal individuals or organisations with cultural knowledge of the area and who may wish to participate in consultation (Section 4.1.1 of ACHCRs)	Heritage NSW	Email and stakeholder list letter received 11/12/2023
		Darkinjung LALC	No response
		(Greater Sydney) LLS	No response
		Central Coast City Council	11/12/2023 – email received advising to contact the Darkinjung Local Aboriginal Land Council and the Guringai Tribal Link Aboriginal Corporation.
		NTSCorp	No response
		ORALRA	11/12/2023 - Email received advising to contact DLALC and Joint Management Coordinator for the Worimi Conservation Lands Nadine Russell
		National Native Title Tribunal	The Native Title Vision Tribunal website was checked on the 11/12/2024. There are no Native Title Claimants or Native Title Registrations within, or in close proximity to the study area.
08/01/2024	Advertisement for registrations of interest for consultation from Aboriginal people or organisations with cultural knowledge relevant to the area	Advertisement placed online with the <i>Daily Telegraph</i>	Daily Telegraph also incorporates the online-only community paper the Central Coast Express Advocate
08/01/2024	Letters sent to identified individuals and organisations from Section 4.1.1 of ACHCRs Letter sent via email if address provided; and by post where email not available	A1 Indigenous Services	22/01/2024- email received requesting registration.
		Amanda Hickey Cultural Services	16/01/2024 – email received requesting registration.
		Awabakal & Guringai Pty Ltd	13/12/2023 – email received from Tracey Howie requesting registration.
		Awabakal Descendants Traditional Owners	12/01/2024 – email received from Kerrie Brauer requesting registration.
		Awabakal Traditional Owners Aboriginal Corporation	No response
		Corroboree Aboriginal Corporation	11/01/2024 – email received requesting registration.
		Darkinjung Local Aboriginal Land Council	15/01/2024 -Culture and Heritage Officer registered by phone.
		Didge Ngunawal Clan	No response

	Glen Morris	No response
	Gomery Cultural Consultants	08/01/2024 – email received requesting registration.
	Gunjeewong Cultural Heritage Aboriginal Corporation	09/01/2024 – email received requesting registration.
	Guringai Tribal Link Aboriginal Corporation	No response
	Kamilaroi Yankuntjatjara Working Group	No response
	Kawul Pty Ltd trading as Wonn1 Sites	No response
	Kevin Duncan	15/01/2024 – email received requesting registration
	Kyle Howie	
	Lower Hunter Aboriginal Incorporated	No response
	Metropolitan Local Aboriginal Land Council	No response
	Phillip Pullbrook	No response
	Renee Sales	No response
	Sharon Hodgetts	09/01/2024 – email received form Sharon thanking Apex Archaeology for the information but advising she will not be registering for this project
	Thomas Dahlstrom Offers ACH value by using 3D Laser and Drone technology	24/01/2024 – email received form Thomas Dahlstrom requesting late registration as he was away. Rebecca Bryant from Apex Archaeology replied to Thomas on the same day and advised that she appreciates it is a busy time of year and she has registered him for the project. Rebecca also attached a copy of the information and methodology document for Thomas to review and advised that he has until 20/02/2024 to provide any comments or suggestions.
	Tim Selwyn	No response
	Trent Hodgetts	No response
	Trudy Smith	11/01/2024 – email received requesting registration
	WATTAKA Pty Ltd	
	Widescope Indigenous Group	08/01/2024 – email received requesting registration
	Woka Aboriginal Corporation	No response

		Yinarr Cultural Services	No response
		Yurwang Gundana Consultancy Cultural Heritage Services.	No response
		Yvette and Jackson Walker	No response
		Girragirra Murun Aboriginal Corporation	No response
		Wingarra Wilay Aboriginal Corporation	No response
		Long Gully Cultural Services	No response
		Guthers Aboriginal Corporation	No response
		Pearl Depoma	No response
23/01/2024	Provision of project information and methodology	A1 Indigenous Services	04/02/2024- email received from Carolyn Hickey advising she has reviewed the Information and Methodology document and supports it. Carolyn also advised she has 25 years' experience in helping preserve Aboriginal cultural heritage on projects and would like to participate in field work. Rebecca Bryant from Apex Archaeology replied the following day thanking Carolyn for her reply and that she had noted the group is interested in participating in field work.
		Amanda Hickey	No response
		Awabakal and Guringai Pty Ltd	No response
		Awabakal Traditional Owners Aboriginal Corporation	No response
		Corroboree Aboriginal Corporation	06/02/2024 – email received from Marilyn Carroll-Johnson advised the groups agrees with the methods.
		Darkinjung Local Aboriginal Land Council	24/01/2024 – email of thank received from Jacob Cain.
		Gomeroy	No response
		Gunjeewong	No response
		Kevin Duncan	26/01/2024 – email received from Kevin Duncan thanking Apex Archaeology for the update and advising that he has read and agrees with the Methodology for the project, and would like to be a

			part of any future groundwork proposed. Rebeca Bryant from Apex Archaeology replied on Monday 29/01/2024 advising Kevin she has noted his interest in being involved in field work.
		Thomas Dahlstrom	No response
		Trudy Smith	No response
		Widescope Indigenous Group	No response
18/04/2024	Provision of draft report to all RAPs for comment	A1 Indigenous Services	No response
		Amanda Hickey	No response
		Awabakal and Guringai Pty Ltd	No response
		Awabakal Traditional Owners Aboriginal Corporation	No response
		Corroboree Aboriginal Corporation	No response
		Darkinjung Local Aboriginal Land Council	No response
		Gomeroy	No response
		Gunjeewong	No response
		Kevin Duncan	No response
		Thomas Dahlstrom	No response
		Trudy Smith	No response
		Widescope Indigenous Group	No response



APPENDIX B: STEP 1 LETTERS AND RESPONSES

Responses not included in public report



APPENDIX C: STEP 2 LETTERS AND RESPONSES

Not included in public report



APPENDIX D: ADVERTISEMENT

Version	Created	Status	Plan	Preview
1	08/01/2024 01:17 pm	Submitted	General Notices BSS V2	<div><div>buy search sell</div><div>ABORIGINAL CULTURAL HERITAGE ASSESSMENT: NEW SCHOOL DEVELOPMENT PROPOSAL, TUGGERAH, NSW NOTIFICATION AND REGISTRATION OF ABORIGINAL INTERESTS</div><div></div><div><p>The Trustee of the Roman Catholic Church for the Diocese of Broken Bay (the proponent) has engaged Apex Archaeology to assist in preparing an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed construction for a new K-12 special needs school at 84 Gavenlock Road, Tuggerah NSW. The land is legally defined as Lot 9 DP 3368. The project is located within the Central Coast LGA.</p><p>The project is being assessed as part of a State Significant Development Application (SSDA) and it is anticipated that an ACHA will be required to address the Secretary's Environmental Assessment Requirements (SEARs) for the project. This will include Aboriginal community consultation in accordance with the Heritage NSW, <i>Aboriginal cultural heritage consultation requirements for proponents 2010</i>.</p><p>The purpose of consultation with Aboriginal people is to assist the Department of Premier and Cabinet (DPC) in the DPC Secretary's consideration and determination of the application.</p><p>The proponent invites Aboriginal people who hold cultural knowledge relevant to determining the cultural significance of Aboriginal objects and places within the study area to register an interest in the process of Aboriginal community consultation.</p><p>Please note that details of the Aboriginal people or organisations who register an interest in consultation will be forwarded to both Heritage NSW and the Darkinjung Local Aboriginal Land Council (DLALC). Please advise at the time of registration if you do not wish for your details to be forwarded to either entity.</p><p>The proponent's project manager is Josie Vesco who can be contacted via email at josie.vesco@dbb.catholic.edu.au.</p><p>Aboriginal stakeholders can register their interest by post to PO Box 236, Nowra, NSW 2541; via phone on 0405 236 821; or via rebecca@apexarchaeology.com.au. Please include the name and contact details of your preferred contact person in your registration.</p><p>Registrations will be accepted until CoB Monday 22 January 2024.</p></div></div>

To view this email as a web page, click [here](#)

Hi Rebecca,

here's your tax invoice.

Customer Details

Booking reference: 2313810350

Name: Rebecca Bryant

Address: PO Box 291 Macarthur Square NSW 2560 Australia

Business: Apex Archaeology

ABN: 62385033058

Your Ad Preview

Here is a preview of your booking. Colour and size shown in preview is an indication only.

Pillar: PublicNotices

Classification: Public Notices

You have the option to finalise or make edits to your booking before the [publication deadline](#). If you require assistance with making changes, [refer to our self-service video guide](#).

View Booking

Your booking details

Date issued: 08 Jan 24

Product	Run date	Deadline*	Cost
Buy Search Sell Standard	08 Jan 24		



APPENDIX E: METHODOLOGY, COVER LETTERS AND RESPONSES

Letters and responses not included in public report



APPENDIX F: DRAFT REPORT EMAILS AND RESPONSES

Not included in public report



APPENDIX G: ARCHAEOLOGICAL REPORT