



ARCHAEOLOGY – HERITAGE – MEDIATION – ARBITRATION

Aboriginal Archaeological & Cultural Heritage Management Plan (AACHMP)

Griffith Hospital

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EXECUTIVE SUMMARY

Health Infrastructure NSW (HINSW) are undertaking a redevelopment of the Griffith Base Hospital. The project will provide expanded inpatient, surgical, ambulatory care and critical care services to Griffith Base Hospital. It will also enable the consolidation of several ageing and dislocated buildings into an integrated and contemporary healthcare facility.

The main works for the project were assessed as a State Significant Development (SSD) and the Planning Secretary's Environmental Assessment Requirements (SEARS) SSD-9838218 were issued. Early works were undertaken in accordance with a Review of Environmental Factors (REF). The REF was prepared for the Griffith Base Hospital Redevelopment by Health Infrastructure as the determining authority in accordance with Part 5 of the Environmental Planning and Assessment Act 1979.

Aboriginal consultation, an Aboriginal archaeological assessment, archaeological testing and salvage excavations were undertaken and over 3,000 artefacts uncovered in partnership with the Griffith Local Aboriginal Land Council.

This management plan, which has been prepared in consultation with the Griffith Local Aboriginal Land Council provides policies, strategies and protocols for the management of the Aboriginal archaeology and cultural heritage at Griffith Base Hospital, as detailed in section 6 of this report.



1 INTRODUCTION

1.1 Background

Health Infrastructure NSW (HINSW) are undertaking a redevelopment of the Griffith Base Hospital. The project will provide expanded inpatient, surgical, ambulatory care and critical care services to Griffith Base Hospital. It will also enable the consolidation of several ageing and dislocated buildings into an integrated and contemporary healthcare facility.

The main works of project were assessed as a State Significant Development (SSD) and the Planning Secretary's Environmental Assessment Requirements (SEARS) SSD-9838218 were issued. Early works were undertaken in accordance with a Review of Environmental Factors (REF). This was prepared for the Griffith Base Hospital Redevelopment by Health Infrastructure as the determining authority in accordance with Part 5 of the Environmental Planning and Assessment Act 1979.

To meet the requirements of the SEARS and the REF and to ensure that the Aboriginal archaeological significance of the study area was not adversely impacted upon by the proposal, Comber Consultants were commissioned to undertake Aboriginal consultation and undertake an Aboriginal Archaeological Assessment. Accordingly, Aboriginal consultation was undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Guidelines for Proponents 2010* and documented in an Aboriginal Cultural Heritage Assessment Report (Garbov 2021). In addition, an archaeological assessment (Comber & Garbov 2021) was undertaken in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (2010). That report assessed the study area to contain subsurface Aboriginal archaeological potential and recommended that archaeological test excavation be undertaken.

Accordingly, Aboriginal archaeological test excavations were undertaken from 5th May 2020 to 14th May 2020 in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW* and the Research Design (Comber 2020). The test excavation uncovered 271 artefacts across five Potential Archaeological Deposits (PADs) located across the Griffith Base Hospital. The site was then registered on the Aboriginal Heritage Information Management System (AHIMS) as site number AHIMS 49-2-0180.

The Aboriginal archaeological test excavation report (Comber & Norman 2021a) recommended that an Aboriginal Heritage Impact Permit (AHIP), with salvage, for Potential Archaeological Deposits (PADs) 1 and 2, should be submitted to Heritage NSW. Salvage was not recommended for PADs 3-5 as sufficient information had been gained from these PADs to characterise occupation within those areas.

Salvage excavations were undertaken in accordance with the approved Research Design and AHIP 4667 from 23rd November to 3rd December 2020 (Comber & Norman 2021b). Ten artefacts were retrieved from PAD 1, and up to 3,000 artefacts were retrieved from PAD 2. A Care Agreement was signed between the Department of Premier and Cabinet and the Griffith Local Aboriginal Land Council (GLALC) to enable the GLALC to safely store and manage the artefacts retrieved from the excavation.

Development Consent under s4.38 of the *Environmental Planning and Assessment Act 1979* were issued on 14th October 2021. Conditions B25 and Condition B26 which detail Aboriginal cultural heritage requirements are detailed below. This report has been written to respond to Conditions B25 and B26 and our response to these conditions is detailed below in italics.

1.2 Aboriginal Heritage

B25 Prior to the commencement of construction, the Applicant must consult with Registered Aboriginal Parties to determine specific requirements and management measures to be used on site during construction, including protection of any objects or items in perpetuity.

Consultation has been undertaken with the Griffith Local Aboriginal Land Council, who are the only Registered Aboriginal Party, and is documented in this report and in the ACHAR.

Heritage Management Plan – Aboriginal Heritage

B26. Prior to the commencement of construction, the Applicant is to prepare a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:

- a) Be prepared by a suitably qualified and experienced expert whose appointment has been endorsed by the Secretary;



This Heritage Management Plan has been prepared by Dr Jillian Comber of Comber Consultants who has directed the archaeological survey and assessment; the Aboriginal consultation and preparation of the Aboriginal Cultural Heritage Assessment Report; the archaeological testing and salvage and preparation of the testing and salvage reports.

- b) Be prepared in consultation with Heritage NSW and the Registered Aboriginal Parties;
On 12th November 2021, Dr Jillian Comber rang Lyndon Patterson of Heritage NSW to discuss the content and preparation of this report. He advised that the preferred consultation method would be to submit this report to the Department of Planning, Industry and Environment (DPIE) for comment by Heritage NSW.

Further communication was undertaken with Nicole Davis of Heritage NSW, in February 2022, by phone and email. The content of the AACHMP was discussed and then forwarded to Nicole for comment. Her email response is attached at Appendix A of this report. She is satisfied that sufficient consultation has been undertaken.

This report has been prepared in consultation with the Griffith Local Aboriginal Land Council, who are the only Registered Aboriginal Party for this project. The requirements for management for discussed in the field with Stephen Young, the CEO of the GLALC and the report was forwarded to him for comment. The email chain and the final email from Stephen Young advising he is satisfied with the AACHMP is attached at Appendix B.

- c) Describe how any unexpected finds would be managed.
An Unexpected Finds Protocol is contained in sections 6.4.1 and 6.4.2 of this report.
- d) Include a map showing the SSD boundary, AHIP 4667 boundary and the extent of site 49-2-0180. The purpose of the map will be to inform the approval pathway (SSD or AHIP) and management options, if Aboriginal objects are uncovered during works.
These maps are shown in section 5 of this report..
- e) Include a description of the measures that would be implemented for:
- i. a contingency plan and reporting procedure if previously unidentified heritage items are found or Aboriginal skeletal material is discovered;
This requirement is addressed in section 6.4.1 and 6.4.2 of this report.
 - ii. ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions;
This requirement is addressed in section 6.4.3 of this report.
 - iii. ongoing consultation with the Registered Aboriginal Parties during the implementation of the plan;
This requirement is addressed in section 6.4.4 of this report.
 - iv. Include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.
This requirement is addressed in section 6.4.5 of this report.

1.3 Location

The city of Griffith lies within the Murrumbidgee Irrigation Area, in the north western Riverina region of New South Wales, approximately 480km west of Sydney and is located within the Griffith City Council Local Government Area (LGA) (Figure 1).

The Griffith Base Hospital is located at 5-39 Animoo Avenue, Griffith NSW and is known as Lot 2 DP, 1043580 (Figure 2).



Figure 1: Location of Griffith within New South Wales



Figure 2: Location of study area within Griffith NSW



2 LEGISLATION

2.1 National Parks & Wildlife Act 1974

The *National Parks & Wildlife Act 1974* (NPW Act) provides statutory protection to all Aboriginal sites within New South Wales. Heritage NSW is the State Government agency responsible for the implementation and management of this Act.

Part 6 of the *National Parks & Wildlife Act* states that it is an offence to harm or desecrate an Aboriginal object or Aboriginal place, without an Aboriginal Heritage Impact Permit (AHIP). An Aboriginal object is defined as:

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.

An Aboriginal Place is defined as:

A place that, in the opinion of the Minister, is or was of special significance with respect to Aboriginal culture, to be an Aboriginal place for the purposes of this Act.

As this project is being assessed as a State Significant Development approval under Part 6 of the *National Parks & Wildlife Act 1974* will not be required. Please see below.

2.2 Environmental Planning & Assessment Act 1979

Part 4, Division 4.7

The main works for this project are being undertaken as a State Significant Development under Part 4, Division 4.7 of the Environmental Planning & Assessment Act 1979 (EPA Act). Section 4.41 of the EPA Act (see below) does not require that a State significant development seek approval under the NPW Act as follows:

4.41 Approvals etc legislation that does not apply
(cf previous s 89J)

- (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 1974,
 - (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 purpose of complying with any environmental assessment requirements under this Part in connection with a development application for any such development.



Part 5, Division 5.1

Early works were undertaken which involve demolition, alterations and additions, replacement of facilities and car park works within the boundaries of an existing health services facility. Such works are classified as 'development permitted without consent' under clauses 5(3), 41(1), 58(1)(a), (b), (c) and (e), 66A(2), 106(3B), 111(1) and 125(1) of *State Environmental Planning Policy (infrastructure) 2007* (ISEPP).

A Review of Environmental Factors (REF) (Urbis 2020) was prepared to assess the impact of the works and approved by Health Infrastructure NSW. The REF required that Aboriginal archaeological testing and salvage be undertaken and that an AHIP needed to be applied for to allow the salvage undertaken. Accordingly, AHIP 4667 was issued for the Aboriginal archaeological salvage.



3 ABORIGINAL PARTNERSHIP

The study area is within the Wiradjuri Nation and the boundaries of the Griffith Local Aboriginal Land Council.

Aboriginal culture is dynamic and continuous. It includes the tangible and intangible and links people over time to their community and land. It is important to recognise that Aboriginal people have the right to protect, preserve and promote their cultural heritage. In recognition of that right, the Griffith Local Aboriginal Land Council (GLALC) was invited to take part in the project and partnered with Comber Consultants and Health Infrastructure to deliver the project.

Initial consultation began in 2019 when the GLALC's Acting CEO, Mr Steve Collins, met with the consultant on 4th December 2019 and discussed the project. Steve viewed plans showing the redevelopment, discussed the impact on the cultural heritage of the hospital and the Aboriginal community. Whilst welcoming the new hospital proposal, he supported the need for appropriate archaeological and cultural heritage assessment and management of the site and Steve registered an interest in consultation on behalf of the GLALC for consultation.

Consultation was undertaken in accordance with the *Aboriginal Cultural Heritage Consultation Guidelines for Proponents 2010* and an Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared. The Griffith Local Aboriginal Land Council was the only organisation to register an interest.

Representatives of the Griffith Local Aboriginal Land Council took part in the assessment, testing and salvage and agreed with the recommendations contained in the assessment and excavation reports. Liaison has regularly occurred with Mr Stephen Young, the current CEO and Health Infrastructure and Comber Consultants. Such liaison is ongoing.

A Care Agreement has been signed between the Secretary of the Department of Premier and Cabinet and the Griffith Local Aboriginal Land Council for the transfer and safekeeping of the Aboriginal artefacts uncovered during the test and salvage excavations to the Land Council.

In addition, Wiradjuri Elder, Uncle James Williams Senior provided a smoking ceremony on 23rd November 2020 to celebrate the uncovering of the artefacts and to cleanse the site for a brighter and positive future.

This Management Plan including the policies, strategies and protocols have been developed in consultation with Mr Stephen Young, the CEO of the GLALC and a copy of this report has been forwarded to the GLALC. A letter from the GLALC confirming support for this management plan is attached at Appendix A.

4 ABORIGINAL HISTORY

Griffith is located within the western portion of Wiradjuri country. Wiradjuri country is located in central New South Wales and encompasses an area of over 80,000 square kilometres making it one of the largest Aboriginal language regions in Australia (Macdonald 2004:22). See Figure 3. The term Wiradjuri can refer to the people, their language or the geographical area designated as Wiradjuri Country (Macdonald 1986:3). Where once it may have clearly referred to a language group, today Wiradjuri people are defined by an extensive kin network (Macdonald 1986; Read 1983:xii) and by their cultural heritage.

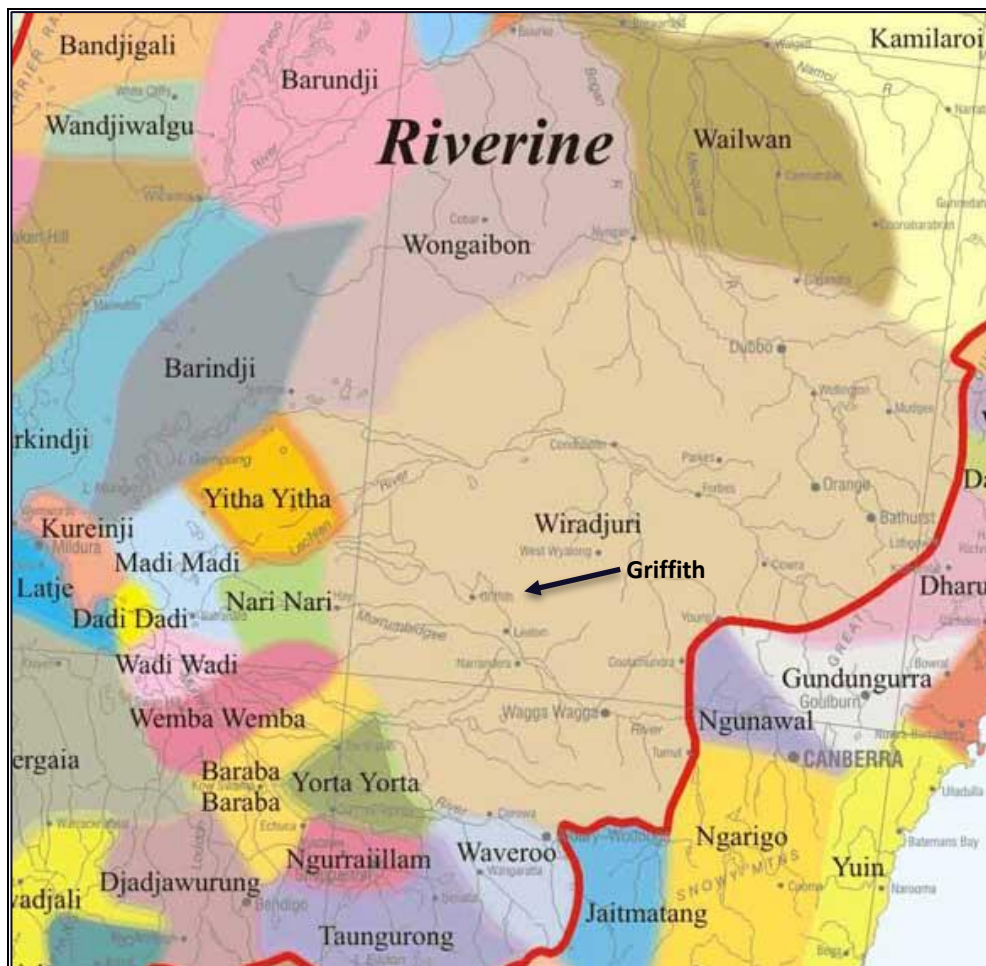


Figure 3: Showing the location of the Wiradjuri Nation within the Riverina (Horton 1996)

Wiradjuri country includes part of the Riverina region on the central west slopes and plains of New South Wales and extends from Nyngan to Albury, and Bathurst to Hay (Horton 1994(2):1189; Macdonald 2004:22) (Figure 5). Wiradjuri people refer to their land as “The Country of the Three Rivers”, with the watershed of the Macquarie, Lachlan and Murrumbidgee Rivers forming the boundaries. The Macquarie River in the north was known to the Wiradjuri as “Wambool”; the Lachlan River, which was known to the Wiradjuri as “Kalar”, is to the west and the Murrumbidgee, which retains its traditional Wiradjuri name, flows to the south. The Macquarie meets the Barwon and flows west into the Darling River and then flows south. The area around the Lachlan, Macquarie, Murrumbidgee and Darling Rivers is the area traditionally inhabited by Wiradjuri speakers prior to the invasion and continues to be regarded as Wiradjuri country today. This rich riverine environment contributed to a highly developed economy for the Wiradjuri and continues to nurture Wiradjuri lifeways (Macdonald 2004:22; Macdonald 1986:4).

The component of Wiradjuri country in which the study area is located is a flat modified terrain in the fully developed town centre of Griffith NSW, approximately 700m south of the McPhersons Range/Scenic Hill Reserve. The present-day town is situated within the Cocoparra geological group, the local topography being characterised by flat to gently undulating plains of red and brown clayey sand, loam and lateritic soils. The underlying lithology is part of the Ravendale Terrestrial Basin



and includes typical features such as the Rankin Formation, Mailman Gap Conglomerate Member, Womboyne Formation, Jimberoo Member, Melbergen Sandstone Member, Confreys Shale Member, Naradhan Sandstone, Barrat Conglomerate (Wynn 1977). Typical unmodified soil profiles within the study area would have comprised a 0-35 cm deep A horizon of red to yellowish clay sands to sandy clays overlying up to 1.6 m deep B horizons of medium clays (NSW Soil and Land 2020). Aboriginal objects within the study area would be concentrated within the A horizon soils.

The study area is approximately 30 km north of the Murrumbidgee River and approximately 8km west and north of Mirrool Creek, the largest permanent water source in the local area. Several ephemeral creek lines descending from the McPhersons Range/Scenic Hill Reserve are to be found approximately 700m north of the study area.

Original vegetation communities has been cleared but would have included Inland Riverine Forests characterised by *Eucalyptus camaldulensis* (river red gum), occasionally with *E. largiflorens* (black box), *E. meliodora* (yellow box) or *E. macrocarpa* (grey box). The understorey would have comprised various shrubs and herbs and ferns (Keith 2006:230-231). These vegetation communities provide habitat for a variety of animals such as kangaroos, wallabies, sugar gliders, possums, various lizards, snakes and birds – species hunted by past Aboriginal people as sources of food and raw materials for clothing, ornamentation, tools and implements (Attenbrow 2010).

The Wiradjuri language was essentially an oral tradition. However, combined with other forms of communication such as hand signals, subtle body language and signs/symbols engraved or painted on surfaces within the landscape, on possum skin cloaks and human bodies, a very rich and detailed method of communication was developed (Green 2002:63). The spoken language is rich in vocabulary, grammar and structure with its own sounds and words (Grant & Rudder 2001). As with law and spirituality, language carries the culture of the Wiradjuri. They merge into one to provide the basis for communication, group cohesion, identity and security. According to the ethnographer, R. H. Matthews (1896) the Bogan River Wiradjuri spoke a dialect of the Wiradjuri language called “Wonghibon”, whilst “the Castlereagh, the Mole and the Barwan” Wiradjuri spoke “Wailwan”.

Despite sharing a language, the Wiradjuri were not a single political unit ruled by a Chief. Rather, they were a confederacy of clans or family groups who shared a language, albeit with some local differences or dialects as detailed above, and a system of common beliefs. Politics operated at a local level and was informed by local senior men and women who had developed a broad and extensive range of skills and cultural knowledge. “Clever” Men or women who were particularly skilled in ritual knowledge and practices would have been respected over a wide area - but they were not Chiefs (Macdonald 2004). Leadership of a particular activity was undertaken by the person most qualified, such as the best speaker or warrior. As people’s expertise and reputations increased with age, they may have exerted influence over a broader area of networks cultivated throughout their life (Macdonald 2004:22). Descent passed through the female line with a “two moiety matrilineal social system” (Read 1983:8), that is, a person’s totem was different to their mother, but the same as their grandmother (Read 1983:8).

The Wiradjuri language speakers lived in family groups of husband and wife (or wives), their children and grandparents, adult sons and their wives and children. They were part of a larger autonomous clan group who had rights over a defined area or “home territory” within the broader Wiradjuri country. This was usually near permanent water (Matthews 1906:941; Read 1983:6; Pearson 1987:86). Each clan often identified themselves by the river around which they camped and which provided sustenance. Individuals would identify themselves as a “Boganer”, a “Lachlan woman” or from the Murrumbidgee (Macdonald 2001:2). Three major clans were recorded by Mathews (1906:941) as centring on Wellington, Mudgee-Rylstone and Bathurst. Howitt (1904:56) recorded three major clans at Narrandera, “Kutu-mundra” (now Cootamundra) and “Murring-balla” (now Murrumburrah). The Land Commissioner for the Lachlan region described three major clan groups on the south bank of the Lachlan, on the north bank of the Murrumbidgee and on the Booroowa River (Beckham 1853). Other clans included the Lachlan clan to the south-west of the Bathurst-Mudgee area, the Lower Macquarie clan to the north-west, the Castlereagh clan to the north, and the Bogan clan to the west (Pearson 1984:66). The clan territories were estimated to contain a radius of approximately 40-48km (Mathews 1906:941; Pearson 1987:86). Each of these clans divided into smaller family groups for everyday food procurement and living (Howitt 1996:208-2011).

Traditionally, these small self-contained family groups used the river flats and waterways as travelling routes to access resources on a seasonal basis. Their land provided all their economic and spiritual nourishment. It contained the water and food resources, shelter and the sacred sites necessary to their religious and ceremonial life. Small bough shelters were constructed for protection from the elements and used by family groups whilst travelling. They consisted of a frame of boughs or saplings placed upright in the ground in a semi-circular shape. The upper sections were tied together and covered with leaves, bark or grass (Kabaila 1999:120). Huts made of sheets of bark attached to timber supports were observed in



the Yass area. Wind breaks were erected for a small fire lit near the entry to these shelters for heating and cooking and (Green 2002:57-58). Evidence of Wiradjuri occupation can still be seen in the form of open artefact scatters, scarred and carved trees, hearths and bora grounds (AHIMS).

Availability of water and resources dictated movement, the location of occupation camps and population size within those camps. The large rivers were the prime camping locations, however, wetlands provided good food resources and fresh water, whilst springs at various locations were suitable for localised seasonal camps. Rock holes also provided water as did “puddled stumps”, where a tree stump was hollowed out by fire and lined with clay and layered with small stones, to hold water. Boughs, bark or hollowed tree logs were placed into both the rock holes and puddled stumps to direct water into them (Gilmore 1935:36; Green 2002:72).

Wiradjuri food economy was focused on rivers, swamps, forests and their hinterlands. As Wiradjuri occupation was centred on major rivers, the Wiradjuri became known as “the river people”. Their procurement strategy was based on adaptive stability, determined by a deep knowledge of nature and countryside, and a careful approach to hunting and collecting. There is abundant evidence for advanced economic practices such as harvest rotation to ensure continuous supply of food, which also guaranteed a varied diet. Wiradjuri country was recognised by natural features which defined the boundaries and by spiritual sites which were associated with their ancestors (Comber 2019:10-15)

The first encounters of Europeans on Wiradjuri country occurred during the expeditions of explorers George Evans in 1813 (Turpin 1913), John Oxley in 1817 (Oxley 1964), Hamilton Hume and William Hovell in 1824 (Bland 1965), Charles Sturt in 1828-9 (Sturt 1982) and Thomas Mitchell 1835-1845 (Mitchell 1893). In the 1830s full-scale non-Aboriginal expansion commenced into Wiradjuri lands.

The Wiradjuri and their lands were gradually taken over by farms, cattle stations and pastoral estates as they expanded along river corridors. The second half of the 19th century was a time of even greater expansion into Wiradjuri country. Almost every hectare was alienated (Comber 2019) - including the study area. This is in the northern portion of what was the Kooba pastoral holding - housing an out-station widely referred to as Jondaryan (Figure 4).

In 1909, the *Aborigines Protection Act* was introduced to provide government with the ability to contain and control Aboriginal people. This Act established several managed and unmanaged Reserves to which Aboriginal people were forcibly relocated and effectively confined. The nearest reserve to Griffith was at Darlington Point. Other reserves include Erambie Reserve near Cowra, Euabalong Reserve, Warangesda and Cumeragunja (Comber 2019:48-49). The Act was not rescinded until 1960. Table 1 below provides further details.

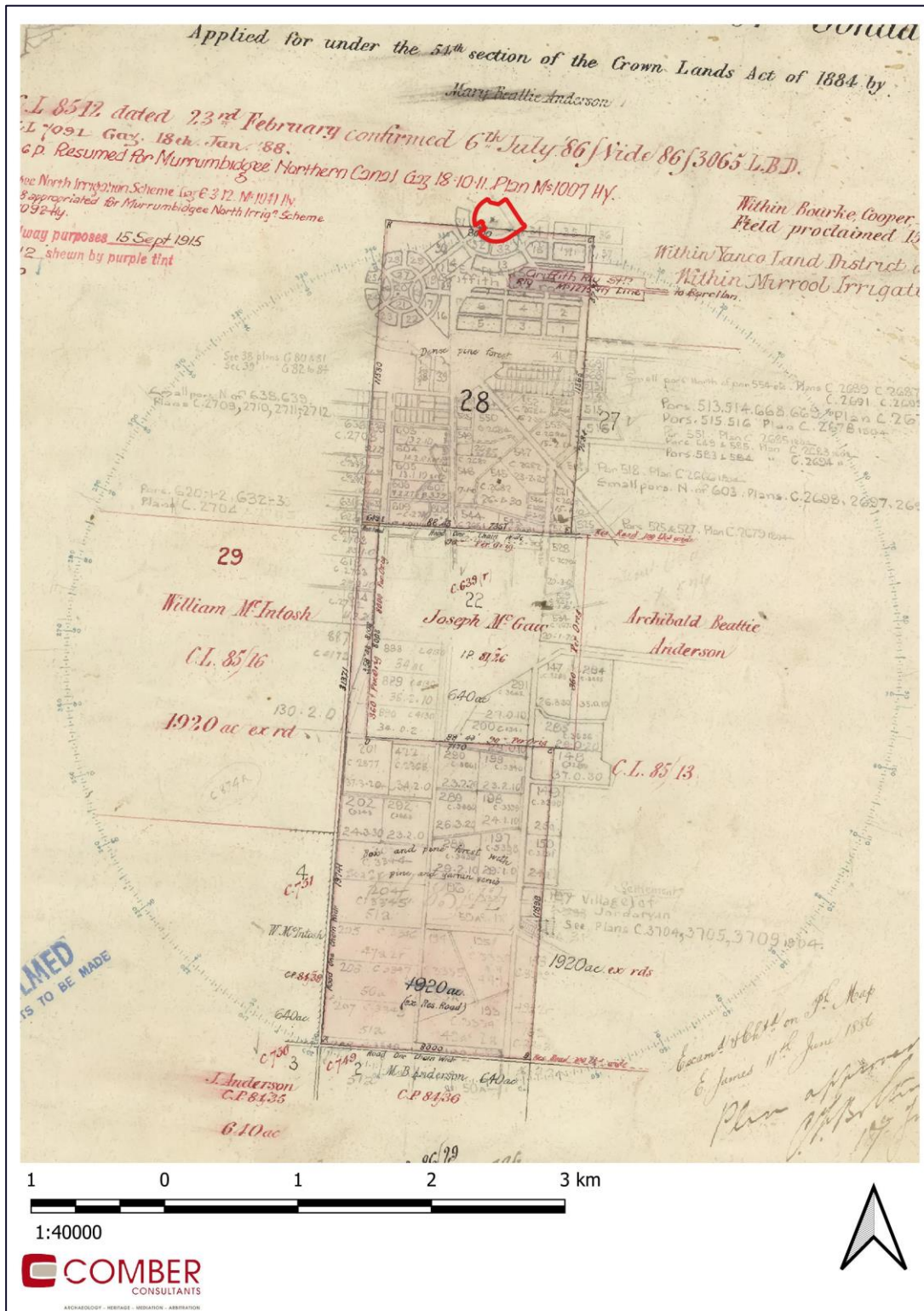


Figure 4: GIS overlay of the study area on the 1886 Crown Plan 875-1804 showing the Kooba pastoral estate with later addition of the Griffith Town plan, study area outlined in red.



Name	Location/s	Period of occupation	Characteristics
Warragesda	Darlington Point	1879-1924	Established as an 'Aboriginal Station' by John Gribble, later converted to a mission managed by the Aborigines Protection Board'. Appearance of a small village with a church.
Darlington Point Reserve	-	1924-1950s	After the dissolution of Waragesda people from the mission and people from other places camped together along the banks of the nearby Murrumbidgee river. Fibro shacks and corrugated iron houses with fibro floors and a small church were constructed.
Wattle Hill, Leeton	1.8 km west of Leeton Cannery	1940s-1960s	Former cannery workers' fringe camp. After the end of WWII it was occupied extensively by Wiradjuri people. Four streets of corrugated iron and bag huts. Bulldozed ahead of development in 1968.
Griffith Town camps	The Pines Old Tip Golf Course Scenic Hill Wakaden Street Tharbogang Condo lane The Willows	1940s-1970s	Series of shanty towns made up of humpies and bag huts of seasonal workers throughout Griffith.
Frogs Hollow Marsh	Western edge of Griffith	1940s-1990s	Camp made of bag huts and tin humpies established during the labour shortages of WWII. Although shacks were pulled down in 1959 the area was populated by people into the 1990s.
Three ways	Adjacent to Frogs Hollow Marsh	1954-1980s	Five acres of land set aside as Aboriginal reserve. After the demolition of Frogs Hollow Marsh people moved to Three ways. Housing scheme for Aboriginal people developed in the 1960s, comprising houses and tin huts; sewage since the 1970. Redeveloped as subdivision in the 1970.

Table 1: Detail of Aboriginal Reserves and settlements in the Griffith Area in the 20th century (Kabaila 2004:34)

The lives of people who had lived according to traditional ways in this area were catastrophically altered by European occupation and settlement over a century. Despite the imposed changes, (including loss of land, access to resources and prevention of the practice of cultural observances), Wiradjuri descendants have retained core values related to traditions, customs and beliefs. Through perseverance and great resilience these values are continuing to be passed on to present and future generations. In the 2016 Census, Griffith's population numbered 18,874. Aboriginal and/or Torres Strait Islander people made up 5.0% of the population. This compares to 2.9% across NSW (2006 Census Stats www.abs.gov.au).

Wiradjuri people are represented by the Wiradjuri Council of Elders and each community has established their own form of governance to represent local interests. The Griffith Local Aboriginal Land Council represents the people in and around Griffith.

5 SITE BOUNDARIES

5.1 SSDA Boundary

The State Significant Development Application Boundary is shown in Figure 5 below.



Figure 5: The SSDA boundaries are shown in red dashed line.

5.2 Early Works Boundary

The proposed early works which are shown in Figure 6 and were approved by Health Infrastructure NSW under a Review of Environmental Factors, included:

- Demolition of Buildings 7, 8 & 9
- Construction of Temporary Paediatrics Unit
- Construction of NCS Building including ambulance accessway
- Site wide infrastructure including new oxygen tank, services diversions and relocations
- Construction of Temporary Car Park, southside of campus
- Demolition of Buildings 10, 11, 11a, 12, 13, 14, 18, 21, 23, 24 and 30



Figure 6: Demolition and early works approved by HINSW under a Review of Environmental Factors

5.3 Boundary of Site 49-2-0180

The boundary of site 49-2-0180 which is registered on the Aboriginal Heritage Information System is the whole of the Griffith Hospital as shown edged in purple on Figure 8 below. PADs 1-5 are shown edged in blue.



Figure 7: Boundary of site 49-2-0180 edged in purple. Potential Archaeological Deposits edged in blue

5.4 AHIP Boundary

An Aboriginal Heritage Impact Permit No. 4667 was issued to allow the early works to be undertaken. Figure 8 shows the AHIP boundary.

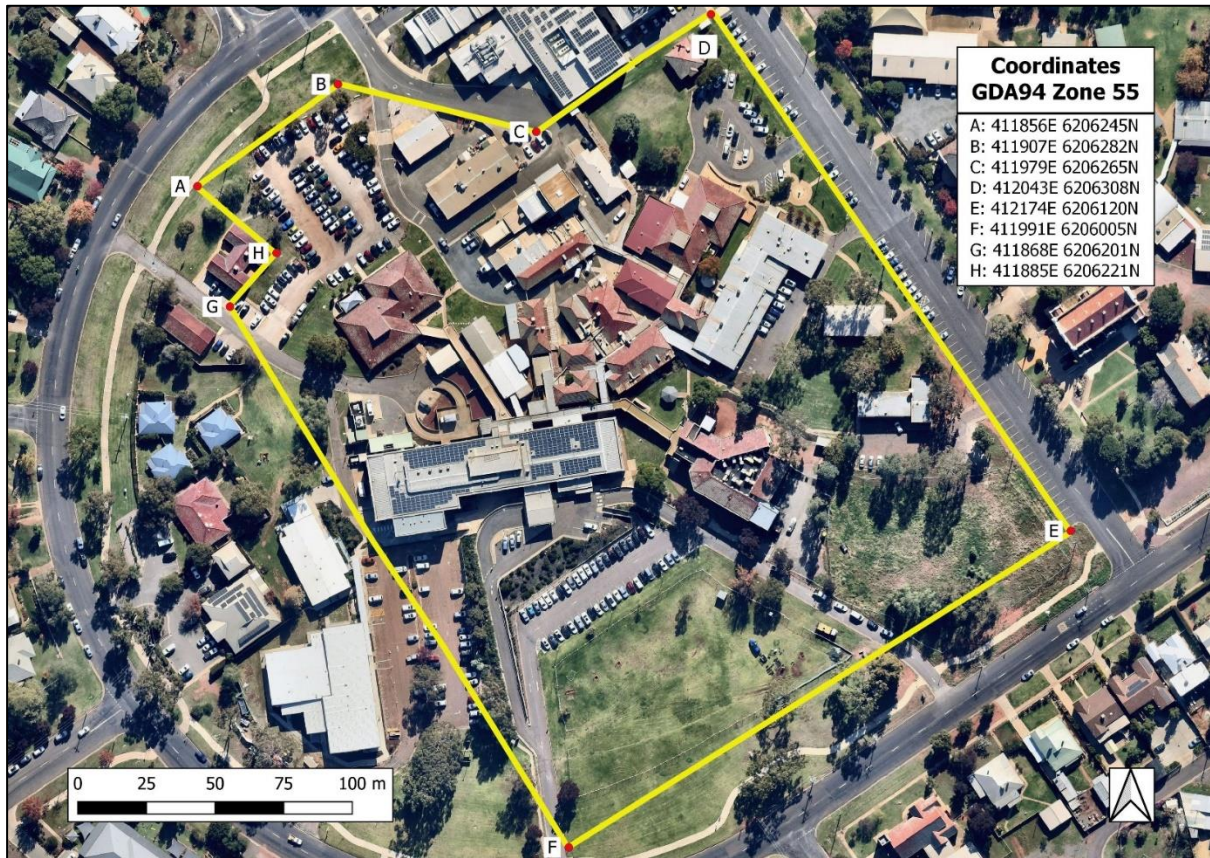


Figure 8: AHIP boundary edged in yellow.



6 MANAGEMENT PLAN

6.1 Introduction

All demolition, construction and temporary works within the site will comply with the requirements of the NSW *National Parks and Wildlife Act 1974*, the archaeological reports and all conditions attached to excavation permits.

The following policies, strategies and protocols have been developed to assist HINSW to manage the Aboriginal archaeology and cultural heritage of the Griffith Base Hospital. These are aimed at avoiding or minimising negative impacts or enhancing positive impacts.

6.2 Policies

The recommendations of the Management Plan have been developed in keeping with the following conservation policies:

- Respecting Aboriginal cultural heritage and acknowledging that Aboriginal people are the rightful owners of their heritage.
- Meeting the needs of the local Aboriginal community for broader awareness and understanding of their culture and heritage.
- Aboriginal people need to be actively involved in identification, assessment and management of their heritage which is integral to effective conservation of that heritage.
- The management of Griffith Base Hospital should include timely and appropriate provision for Aboriginal involvement.
- Ongoing evaluation and regular, scheduled reviews of the Management Plan.

6.3 Strategies

The strategies to implement those policies include:

- Interpretation of the Aboriginal history of Griffith and the hospital site through the archaeology, oral histories, stories and artworks.
- A Care Agreement signed between the Secretary of the Department of Premier and Cabinet and the Griffith Local Aboriginal Land Council for the transfer and safekeeping of the Aboriginal artefacts uncovered during the test and salvage excavations to the Land Council.
- A contingency plan for management of previously unidentified objects that may be uncovered during works.
- A contingency plan if Aboriginal skeletal remains are uncovered
- Heritage induction protocols for workers on site
- A procedure to ensure appropriate consultation with the Aboriginal community and regulatory authorities.
- A monitoring and review mechanism to ensure that the management strategies are working or require updating.

6.4 Protocols

6.4.1 *Previously unidentified Aboriginal objects*

If any Aboriginal objects are unexpectedly uncovered during the redevelopment of the site, all work must cease in the vicinity of the object and an area of at least one metre around the Aboriginal object secured and cordoned off using fencing and/or appropriate barriers. Dr Jillian Comber must be immediately contacted on 0418 788802 or (02) 9799 6000 for further advice. She will assess the object, provide further advice and will liaise with the Registered Aboriginal Parties, Heritage NSW and Health Infrastructure. No-one should enter the secured area and work can only recommence in that area when advised by the consultant. Please see Appendix C for further details.

6.4.2 *If Aboriginal skeletal remains are uncovered*

If any skeletal remains are uncovered during the redevelopment of the site, all work must cease in the vicinity of the human skeletal remains and an area of at least five metres around the skeletal remains secured and cordoned off using fencing and/or appropriate barriers. Dr Jillian Comber must be contacted immediately on 0418 788802 or (02) 9799 6000 and must attend immediately. The consultant will inspect the skeletal remains to confirm that they are human and if they are Aboriginal. If the remains are human, the consultant will contact and liaise with the Police, Heritage NSW and the Registered Aboriginal Parties, all of whom will most likely attend the site. Work will not be able to recommence within the secured area and no-one should enter the secured area until suitable management procedures are in place. Please see Appendix C for further details.



6.4.3 *Heritage inductions for workers*

Prior to redevelopment of the site, all personnel, workers, employees, contractors and sub-contractors should be inducted into their responsibilities under the NSW *National Parks & Wildlife Act 1974*. Managers of the infrastructure should be trained in procedures to recognise and avoid disturbance to Aboriginal objects. The content of the inductions should include, as a minimum:

- Aboriginal history of Griffith and the broader area.
- Importance of Aboriginal sites and places to the Aboriginal and broader community.
- Advice that it is an offence to harm Aboriginal objects.
- Relevant protocols and the workers responsibilities under the *National Parks & Wildlife Act 1974 and Regulations*.
- Archaeological work undertaken to date.
- Instructions on how to identify an Aboriginal object, including photographs and types of artefacts to be expected within the area, and
- Actions to be taken as detailed in 6.4.1 (previously unidentified Aboriginal objects) and 6.4.2 (if Aboriginal skeletal remains are uncovered).
- General obligations of contractors and visitors.

Records of those inductions are to be retained by the head contractor and sub-contractor and sent to HINSW by the archaeologist.

Dr Jillian Comber, will prepare and deliver the induction and provide training to relevant Managers.

Please see Appendix B for further details.

6.4.4 *Ongoing consultation with the Registered Aboriginal Parties during the implementation of the plan*

Aboriginal community consultation that has been undertaken to date should continue. Jillian Comber will continue to liaise regularly with Mr Stephen Young, CEO of the Griffith Local Aboriginal Land Council, by telephone and email. In addition, consultation meetings will be undertaken in association with the monitoring procedures as detailed below.

6.4.5 *Monitoring and review*

It is important to ensure that the policies, strategies and protocols detailed in this report are implemented. Jillian Comber, archaeologist, will liaise regularly by telephone and email with the main works contractor to monitor implementation of the above policies, strategies and protocols. She will also visit the site every nine months, in addition to visits in respect of unexpected finds, to undertake a comprehensive review of procedures and provide a report on the effectiveness of the above measures. She will undertake that review in consultation with the Griffith Local Aboriginal Land Council. She will also meet with and consult with the Griffith Local Aboriginal Land Council to discuss any issues of concern and the effectiveness of the policies, strategies and protocols detailed above. Any issues or concerns expressed by the Griffith Local Aboriginal Land Council will be addressed and any of the above strategies amended to the satisfaction of the Griffith Local Aboriginal Land Council. The proposed timing for the consultation and monitoring are detailed below. However, if required, she will visit the site at other times in addition to the following:

- Q1 2022
- Q4 2022
- Q3 2023
- Q2 2024
- Q1 2025
- Q4 2025



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APPENDIX A: EMAIL FROM HERITAGE NSW

From: Nicole Davis <Nicole.Davis@environment.nsw.gov.au>
Sent: Wednesday, 23 February 2022 9:18 AM
To: Jillian Comber <jillian.comber@comber.net.au>
Cc: Lyndon Patterson <Lyndon.Patterson@environment.nsw.gov.au>
Subject: Heritage NSW Reply - Re Griffith Base Hospital (SSD 9838218) 23.2.2022
Importance: High

Hi Jillian,

Thank you for your email.

I can advise that Heritage NSW has been adequately consulted in relation to Griffith Base Hospital - SSD 9838218, and that the *Aboriginal Archaeological & Cultural Heritage Management Plan*, developed for the project in December 2021, has been reviewed and approved accordingly. Heritage NSW has reviewed all relevant documentation associated with this project, and I note that Heritage NSW has no additional concerns or comments with respect to Aboriginal cultural heritage and the management recommendations provided.

Should DPE require any further information, they can contact me directly as the Manager Heritage Assessments - Heritage NSW.

Kind Regards
Nicole Davis

Nicole Davis | Manager Assessments

Heritage NSW, Community Engagement, Department of Premier and Cabinet
Level 6, 10 Valentine Ave, Parramatta | Locked Bag 5020 Parramatta 2124
T: 02 4927 3156 M: 0409 394 343 | nicole.davis@environment.nsw.gov.au



Premier
& Cabinet

I acknowledge and respect the traditional custodians and ancestors of the lands I work across.



APPENDIX B: CORRESPONDENCE WITH GLALC

From: Stephen Young <griffalac@bigpond.com>
Sent: Monday, 21 February 2022 3:58 PM
To: Jillian Comber <jillian.comber@comber.net.au>
Subject: RE: Management Plan

Hi Jillian,

We are happy to progress with the ACH Objects and Materials Management Plan as illustrated.

Regards

Stephen Young
CEO



Griffith Local Aboriginal Land Council
P.O Box 8043 East Griffith NSW
5 Wiradjuri Pl, Griffith NSW 2680
Ph: (02) 69626711
Fax: (02) 69641477
Email: griffalac@bigpond.com

From: Jillian Comber <jillian.comber@comber.net.au>
Sent: Monday, 21 February 2022 3:02 PM
To: Stephen Young (griffalac@bigpond.com) <griffalac@bigpond.com>
Subject: FW: Management Plan

Hi Stephen

Just following up on the Management Plan. Could you please let me know if you are happy with the Management Plan. Please feel free to ring me to discuss.

Cheers

Jillian

From: Jillian Comber
Sent: Wednesday, 16 February 2022 10:20 AM
To: Stephen Young (griffalac@bigpond.com) <griffalac@bigpond.com>
Subject: RE: Management Plan

Hi Steve

Sorry I missed your call. I just tried to ring you without success. I am available all day today, if you would like to try calling me again.

Cheers

Jillian



From: Jillian Comber
Sent: Friday, 11 February 2022 3:21 PM
To: Stephen Young (griffalac@bigpond.com) <griffalac@bigpond.com>
Subject: Management Plan

Hi Stephen

At the request of Health Infrastructure I have prepared a management plan for Aboriginal archaeology and cultural heritage at the hospital. Could you please review the attached and provide me with your comments. Would you like anything else included (or excluded)?

Please ring me to discuss when you receive this.

Kind regards

Jillian

DR JILLIAN COMBER

B.A., Litt.B., PhD., M.AACAI, M.ICOMOS

DIRECTOR
ARCHAEOLOGIST
HERITAGE CONSULTANT

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E jillian.comber@comber.net.au



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Comber Consultants acknowledges the traditional custodians of the land on which we work and pay our respects to Elders past and present.



APPENDIX C: INDUCTION AND UNEXPECTED FINDS PROCEDURE

ABORIGINAL ARCHAEOLOGY

INDUCTION

Aboriginal Significance

Griffith is located within the land of the Wiradjuri Nation. The landscape of Griffith and its surrounds is flat. The site of the hospital is located on a small rise with Scenic Hill located only about 1km to the north east of the hospital. These two small hills are notable features in an otherwise flat landscape. Scenic Hill was the site of ceremonies. Men, women and children camped at the hospital site and prepared themselves for ceremony including painting themselves with ochre. Those involved in the ceremony would then walk from the hospital site to Scenic Hill to perform the ceremonies. During archaeological excavations over 4,000 artefacts were uncovered. The majority of these were made using a technique called “bipolar flaking” whereby the river cobble to be made into an artefact is placed on a large flat stone (anvil) and then struck with a large heavy hammerstone. The compression from both ends cause the river cobble (core) to shatter into workable flakes. These technique, which varies from knapping techniques was used when suitable material was not available for knapping. Bipolar flaking was used when the available cobbles were very small. The use of bipolar flaking is a testament to the ingenuity of the Wiradjuri. The archaeological evidence from this site shows the ingenuity of Aboriginal people in adapting stone tool making techniques to suit the environment. It also demonstrates the ceremonial and traditional way of life of the Wiradjuri

Artefacts

A range of different artefacts could be found on the site. Photos of these are on the following pages. They include:

- Backed blades that were used as spear barbs for hunting
- Hammerstones
- Grinding stones
- Axes
- Small sharp flakes that were used for cutting vegetable matter or skinning animals.

Legislation

All Aboriginal artefacts are protected by the *National Parks & Wildlife Act 1977* (NPW Act). Under the Act it is an offence to harm or disturb an Aboriginal artefact (which are called “objects” under the NPW Act). The penalty for harming or disturbing an Aboriginal artefact without a permit is:

- Individual 2,500 penalty units which is \$275,000.00 or imprisonment for 1 year or both.
- Corporation – 10,000 penalty units which is \$1.1m.

A penalty unit is \$110.00

Procedure

Artefacts

If you uncover any object that appears similar to the photographs overleaf, please undertake the following:

- Stop work immediately in the vicinity of that object.
- Report the find to your supervisor immediately.
- Supervisor to report to Project Manager.
- Project Manager rings Dr Jillian Comber on 0418 788802 or (02) 9799 6000 immediately.
- If artefacts are found, cordon off or barricade the object with a 1m buffer zone. You can use star pickets and webbing to build a fence around the object.

- Do not allow anyone to enter the fenced off area.
- You cannot enter the area or remove the fence until given permission by Dr Jillian Comber.
- Site supervisor must facilitate entry for Dr Comber to the site, including providing a WHS induction, if necessary.
- Jillian Comber will advise the project manager of the nature of the finds and procedures for managing the finds.

Dr Jillian Comber or her representative will attend the site immediately and:

- Provide advice.
- Record as much information as possible about location and context of the find.
- Remove the artefact, in accordance with the Aboriginal Heritage Impact Permit.
- Notify the Project Manager and Health Infrastructure.
- Advise you when the fence can be removed and you can enter the area.

Skeletal remains

If you uncover any skeletal remains, please undertake the following:

- Stop work immediately in the vicinity of that object.
- Report the remains to your supervisor immediately.
- Supervisor to report to Project Manager.
- Project Manager rings Dr Jillian Comber on 0418 788802 immediately.
- Cordon off or barricade the remains with a 5m buffer zone. You can use star pickets and webbing to build a fence around the object.
- Do not allow anyone to enter the fenced off area.
- Supervisor must facilitate entry for Dr Comber to the site, including providing a WHS induction, if necessary.
- You cannot enter the area or remove the fence until given permission by Jillian Comber.

Dr Jillian Comber will attend the site immediately and:

- Assess the remains to determine if they are human or animal.
- If human she will assess whether they are Aboriginal or non-Aboriginal.
- If they are Aboriginal, she will ring the Police, the Registered Aboriginal Parties and Heritage NSW.
- If they are non-Aboriginal she will ring the Police.
- She will advise when the fence can be removed and you can re-enter the area. However, if skeletal remains are found it could take several months before the area would become accessible.
- Jillian Comber will advise the Project Manager and Health Infrastructure of the above.



Artefacts made from a stone called tuff



Artefacts made from a stone called quartz



Bipolar artefacts made from quartzite



These two photographs show the artefacts in the field. If you find an area containing what looks like red gravels, stop work and follow procedures. They will most likely be artefacts.

Hammerstones:



Hammerstone with pitting

Ground edge axes



Grinding stones





1.

- Unexpected Find Uncovered.

2

- Stop work immediately in the vicinity of the find.

3

- Advise Supervisor.

4

- Supervisor to advise Project Manager.

5

- Fence find:
- Allow 1m barrier for artefact.
- Allow 5m barrier for skeletal remains.

6

- Do not allow anyone to enter fenced off area.

7

- Provide access for Dr Jillian Comber to the site. Jillian will record and remove the object.

8

- Jillian will advise when the fence can be removed and you can re-enter the area. You cannot re-enter the site until advised by Jillian to do so.