APPENDIX 8-TRAFFIC STUDY PREPARED BY ANDREW MARSHMAN & ASSOCIATES





disturbance incurred by clearance, infilling and landscaping, it is considered probable that this result is a true reflection of the archaeological resource present within the study area. This is discussed further below.

8.2 Survey Coverage Variables

Survey Coverage Variables are a measure of ground surveyed during the study and the archaeological visibility present within that surveyed area. Survey coverage variables provide a measure with which to assess the effectiveness of the survey so as to provide an informed basis for the formulation of management strategies.

Two variables have been recorded during this study to measure ground surface visibility: The area of ground exposure encountered and the quality and type of ground visibility (archaeological visibility) within those exposures. The two variables of ground surface visibility which have been estimated during the survey are defined as follows:

Average Ground Exposure – an estimate of the total area of ground inspected which contained exposures of bare ground; and

Average Archaeology Visibility – an estimate of the average levels of potential archaeological surface visibility within those exposures of bare ground.

Based on the two visibility variables as defined above, a net estimate (Net Effective Exposure) of the archaeological potential of exposure area within a survey unit or set of units is calculated. The Effective Survey Coverage (ESC) is a percentage calculation of the archaeological visibility within the study area; it is defined and required by the DEC.

One survey unit was recorded during this study. This survey unit conforms to a single terrain unit (a combination of landform element, gradient and aspect). The survey unit encompassed both the proposal site and adjacent areas situated to the east.

The survey unit is summarised in Table 1; its location is shown of Figure 5.

A description of this survey unit is provided below.

Survey Unit 1

The survey unit is located on an area of land which extends northward to become the minor peninsula of Tathra Head. The study area encompasses a section of a spur side slope which extends across the entire proposal site and beyond, dropping downwards from west to east at a moderate gradient and terminating beyond the eastern boundary in a cliff which drops away to the ocean rock platform below.

The proposal area is predominantly covered by mown kikuyu grass, with some melaleuca, pittosporum, westringia and acacia distributed along the eastern and southern fringes, and one Norfolk pine tree contained within the grassed area. Towards the north-western section of the study area, below the existing hotel, there is a section of driveway surfaced with introduced pebble, below which a steep embankment covered with thick unmown kikuyu grass descends to a sewerage pump station.

Observable gross prior disturbance within the study area has taken the form of original clearance, the importation of landfill, and thereafter the levelling and landscaping of this imported material. The landfill has inclusions of rubble, concrete, bricks, broken terra cotta pipes and pebbles, and is applied to a maximum depth of ca. 1 metre towards the eastern boundary and a depth of ca. 30 cm at the upper south-western corner. The site area shows undulations across its length reflecting this disturbance and subsequent modification. In addition a sewerage line traverses the eastern section of the study area.

The natural ground surface underlying the introduced layer of fill is indicated to be rocky, as evidenced by a limited series of volcanic rock exposures (ca. 2 metres square in total) which breach the surface in the southeastern quadrant of the proposed area of impact.

The only ground exposures present in the survey unit are areas of bare earth observable within a pedestrian track and in thickets outside the eastern boundary of the zone of impact. This ground exposure area measures c. $25m^2$ in total. Archaeological visibility of these exposures is assessed to be 40%.

No stone artefacts or midden shells were recorded in this survey unit. However, despite the lack of ground exposure, recourse to predictive modelling indicates that the unit should be assessed to be of very low archaeological sensitivity and accordingly to have the potential to contain at most a very low density only of subsurface archaeological deposit. Further than this however, given the gross disturbance which has been enacted upon the proposal area, any subsurface archaeological deposit which might be potentially present will be not only very sparse but highly disturbed.

The survey coverage achieved during the survey is described in Table 2 below.

Survey Unit	Terrain Unit	Survey Unit Area	Area surveyed	Ave. ground exposure	Ave. arch visibility %	Net effective exposure	Effective survey coverage	Sites recorded	Potential for undetected artefacts to be present
SU 1	Side slope of spur crest; Aspect 90°; Gradient 7°.	6000 m²	90% 5400 m²	<1% 25 m²	60%	15 m²	0.25	Nil	Low

Table 2: Survey Coverage Data

8.3 Summary

The single survey unit which comprises the entire study area, being greater than and encompassing the zone of impact, was subject to a comprehensive archaeological survey. The total survey area measures ca. 6000 m².

Approximately 5400 m² of this total area was traversed and inspected during the survey. Ground exposure was extremely sparse as a result of the proposal area being thickly vegetated; ground surfaces are covered predominantly with mown kikuyu grass. Ground exposure was restricted to small areas around the fringes of the property, but such exposures were non-existent within the proposed area of impact. Because of the vegetated groundcover and the introduced fill which underlay this, effective survey coverage achieved during the study is calculated to have been 0.25% of the entire study area.

This effective survey coverage achieved during the survey is ineffectual. The low effective survey coverage is a factor not only of vegetation obscuring the ground surfaces across the study area, but also the presence of introduced fill which overlies the natural landform surface.

Given the general lack of ground visibility within the proposal area and in consequence the inadequate survey coverage achieved during the site inspection, an assessment of the archaeological potential of the study area is drawn through recourse to predictive modelling for the Tathra region as well as an assessment of the history of disturbance of the landform where this development is proposed. This analysis indicates that the proposal area is of very low archaeological sensitivity. It is therefore unlikely that the site contains subsurface stone artefacts or midden material and that if any such material is present it will be distributed at low density and in a grossly disturbed context.

9. STATUTORY INFORMATION

Two pieces of legislation provide the primary basis for Aboriginal heritage management in NSW, the National Parks and Wildlife Act 1974 (NPW Act) and the Environmental Planning and Assessment Act 1979 (EP&A Act) (NPWS 1997).

The Environmental Planning and Assessment Act 1979 (EP&A Act), its regulations, schedules and guidelines provides the context for the requirement for environmental impact assessments to be undertaken during land use planning (NPWS 1997).

The NPW Act provides statutory protection for all Aboriginal objects and Aboriginal Places.

An 'Aboriginal object' is defined as

'An Aboriginal object is any deposit, object or material evidence (not being a handicraft for sale) relating to Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains'.

Under s90 of the NPW Act a person must not knowingly destroy, damage or deface or knowingly cause or permit the destruction, damage or defacement of an Aboriginal object or Aboriginal Place without first obtaining the consent of the Director-General of the NSW DEC. Consents which enable a person to impact an Aboriginal object are issued by the DEC upon review of a s90 application.

Under s87 of the NPW Act a person must not excavate or disturb land for the purposes of discovering an Aboriginal object without first obtaining the consent of the Director-General of the NSW DEC. Permits which enable a person to excavate land for the purposes of determining whether or not an Aboriginal object is present are issued by the DEC upon review of a s87 application.

10. CONCLUSIONS AND RECOMMENDATIONS

No Aboriginal sites or areas of archaeological potential were recorded during the study. The proposal area is assessed to be of very low archaeological sensitivity. It is therefore unlikely that the site contains subsurface stone artefacts or midden material and that if any such material is present it will be distributed at low density and in a grossly disturbed context.

The following recommendations are made on the basis of:

- Legal requirements as set out under the National Parks and Wildlife Act 1974 (as amended) which states that that it is illegal to knowingly destroy, damage or deface or knowingly cause or permit the destruction, damage or defacement of an Aboriginal object or Aboriginal Place in NSW without first obtaining consent of the Director-General of the NSW Department of Environment and Conservation (see Section 9 Statutory Information).
- The results of the investigation as documented in this report.
- An analysis of the survey results.
- Consideration of the type of development proposed and the nature of the proposed impacts.

Given that no Aboriginal objects or archaeological deposits were recorded during the field survey and that the area is assessed to be of low archaeological potential the following recommendations are made:

- 1. There are no Aboriginal archaeological constraints to the development proposal.
- 2. No further archaeological investigations are necessary.
- 3. A single copy of this report should be forwarded to:

John Dixon Bega Traditional Aboriginal Elders Council PO Box 193 Bega NSW 2550

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