

Morgan Wilcox

From: Morgan Wilcox
Sent: Friday, 21 August 2020 12:38 PM
To: 'ahims@environment.nsw.gov.au'
Cc: 'Rose O'Sullivan'; 'April Hudson'; Zina Ainsworth; Nicole Armit
Subject: ASIRF Submission - AHIMS 52-2-4487 (Charlies Point Road OCS-1)
Attachments: ASIRF_52-2-4487_Charlies Point Road OCS-1.pdf

Dear AHIMS Registrar,


Please find attached Aboriginal Site Impact Recording Form following test excavation undertaken at the location of AHIMS 52-2-4487 (Charlies Point Road OCS-1).

Kind regards
Morgan

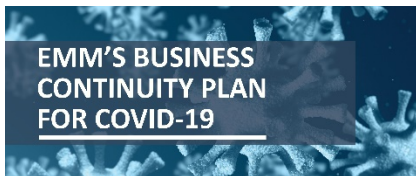
Morgan Wilcox

Senior Archaeologist
Bushfire, Ecology, Heritage and Spatial Solutions (BEHSS)
Division



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Morgan Wilcox

From: David Gordon <David.Gordon@environment.nsw.gov.au>
Sent: Monday, 24 August 2020 7:36 AM
To: Morgan Wilcox
Subject: RE: ASIRF Submission - AHIMS 52-2-4487 (Charlies Point Road OCS-1)

CAUTION: This email originated outside of the Organisation.

Hi Morgan,

ASIRF appended to the Electronic AHIMS record.

Thanks

David Gordon | Senior Heritage Information Officer (Aboriginal)
Heritage NSW, Community Engagement, Department of Premier and Cabinet
Level 6, 10 Valentine Avenue, Parramatta | Locked Bag 5020, Parramatta, 2124

T: 02 9585 6467 | david.gordon@environment.nsw.gov.au



I acknowledge the Traditional Custodians of the land on which
I work and live, pay my respects to Elders past and present
and recognise continued connection to country.



From: Morgan Wilcox <mwilcox@emmconsulting.com.au>
Sent: Friday, 21 August 2020 12:39 PM
To: CCHD Information Systems & Assessment Mailbox <ahims@environment.nsw.gov.au>
Cc: Rose O'Sullivan <Rose.OSullivan@environment.nsw.gov.au>; April Hudson <April.Hudson@simecgfg.com>; Zina Ainsworth <Zina.Ainsworth@simecgfg.com>; Nicole Armit <narmit@emmconsulting.com.au>
Subject: ASIRF Submission - AHIMS 52-2-4487 (Charlies Point Road OCS-1)

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Kind regards
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Senior Archaeologist
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D 02 4907 4821



Aboriginal Site Impact Recording Form

AHIMS Registrar

PO Box 1967, Hurstville 2220 NSW

April 2012 OEH 2012/0558

- 1 This form must be completed following impacts to AHIMS sites that are:
 - a) a result of test excavation carried out in accordance with the *Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW*
 - b) authorised by an Aboriginal Heritage Impact Permit (AHIP) issued by the Office of Environment and Heritage (OEH)
 - c) undertaken for the purpose of complying with Director General's Requirements issued by the Department of Planning and Infrastructure (DP&I) for:
 - State Significant Development (SSD - Part 4),
 - State Significant Infrastructure (SSI - Part 5.1), or
 - A Major Project (Part 3A - now repealed) under the *Environmental Planning and Assessment Act 1979* (EP&A Act), or
 - d) authorised by a SSD/SSI/Part 3A consent/approval under the EP&A Act.
- 2 Completed forms must be submitted to the AHIMS Registrar (www.environment.nsw.gov.au/contact/AHIMSRegistrar.htm).
- 3 This form is intended to complement (not replace) the AHIMS Site Recording Form. Where there is a need to provide detailed information about the nature of a site, use the AHIMS Site Recording Form.
- 4 This form does not replace the need to submit reports to OEH (as a condition of an AHIP or SSD/SSI/Part 3A consent/approval)
This form must be submitted in addition to any reports.

AHIMS site ID: 52-2-4487

Site impact authorisation (select one)	Reference numbers, dates
<input checked="" type="checkbox"/> Archaeological Code (The impacts to this site were the result of test excavation carried out in accordance with the <i>Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW</i> .)	Date OEH was notified (under requirement 15c of the Code): 13/09/2019 OEH Regional office notified: ROG Illawarra
<input type="checkbox"/> AHIP (The impacts to this site were authorised by an AHIP.)	AHIP number: Date issued/signed: AHIMS permit ID/number:
<input type="checkbox"/> SSD/SSI/Part 3A application (The impacts to this site were undertaken for the purposes of complying with Director General's Requirements issued by the DP&I)	Project number: Date Director General's Requirements issued:
<input type="checkbox"/> SSD/SSI/Part 3A approved project (The impacts to this site were authorised by a consent/approval under Parts 4/5.1/3A of the EP&A Act.)	or Date of project approval:

Site status following impacts:

- ☐ Not a site (The investigations concluded that this is not a site.)
- ☒ Valid site (The investigations confirmed that this is an Aboriginal site.)
- ☐ Partially destroyed (The site was partially destroyed following authorised impacts; a portion of the site remains in situ.)
- ☐ Destroyed (The site was completely destroyed following authorised impacts.)

Geographic location

Site name: Charles Point Road OCS-1

Easting: 278313 Northing: 6205768 Coordinates must be in GDA (MGA)

Map sheet:

Zone: 56 Location method: Hand Held/Non Differential GPS

Primary recorder

(The person responsible for the completion and submission of this form)

Title

Surname

First name

Miss

Wilcox

Morgan

Organisation:

EMM Consulting Pty Ltd

Address:

Level 3, 175 Scott Street Newcastle NSW 2300

Phone:

249074800

E-mail:

mwilcox@emmconsulting.com.au

Date recorded:

Fax:

Site information

Open/closed site:

Open

Features:

<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
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1. Aboriginal ceremony and dreaming
2. Aboriginal resource and gathering
3. Art
4. Artefact
5. Burial
6. Ceremonial ring
7. Conflict
8. Earth mound
9. Fish trap
10. Grinding groove

<input type="checkbox"/>
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11. Habitation structure
12. Hearth
13. Non-human bone and organic material
14. Ochre quarry
15. Potential archaeological deposit
16. Stone quarry
17. Shell
18. Stone arrangement
19. Modified tree
20. Water hole

Site condition

Written description of the condition of the AHIMS site (including relevant features) following the authorised impact of the site

In 2018, Niche Environment and Heritage Pty Ltd (Niche) prepared an ACHA for Tahmoor Coal as part of the Tahmoor South Project EIS. The assessment considered potential impacts associated with proposed extensions to underground coal mining at Tahmoor Mine, including the locations of proposed TSC1 (upcast shaft and ventilation fan) and TSC2 (downcast shaft). The ACHA identified one Aboriginal site, Charlies Point Road OCS-1, within the proposed impact footprint for TSC2 and recommended that test excavation be undertaken at this location (Niche 2018, p. 95).

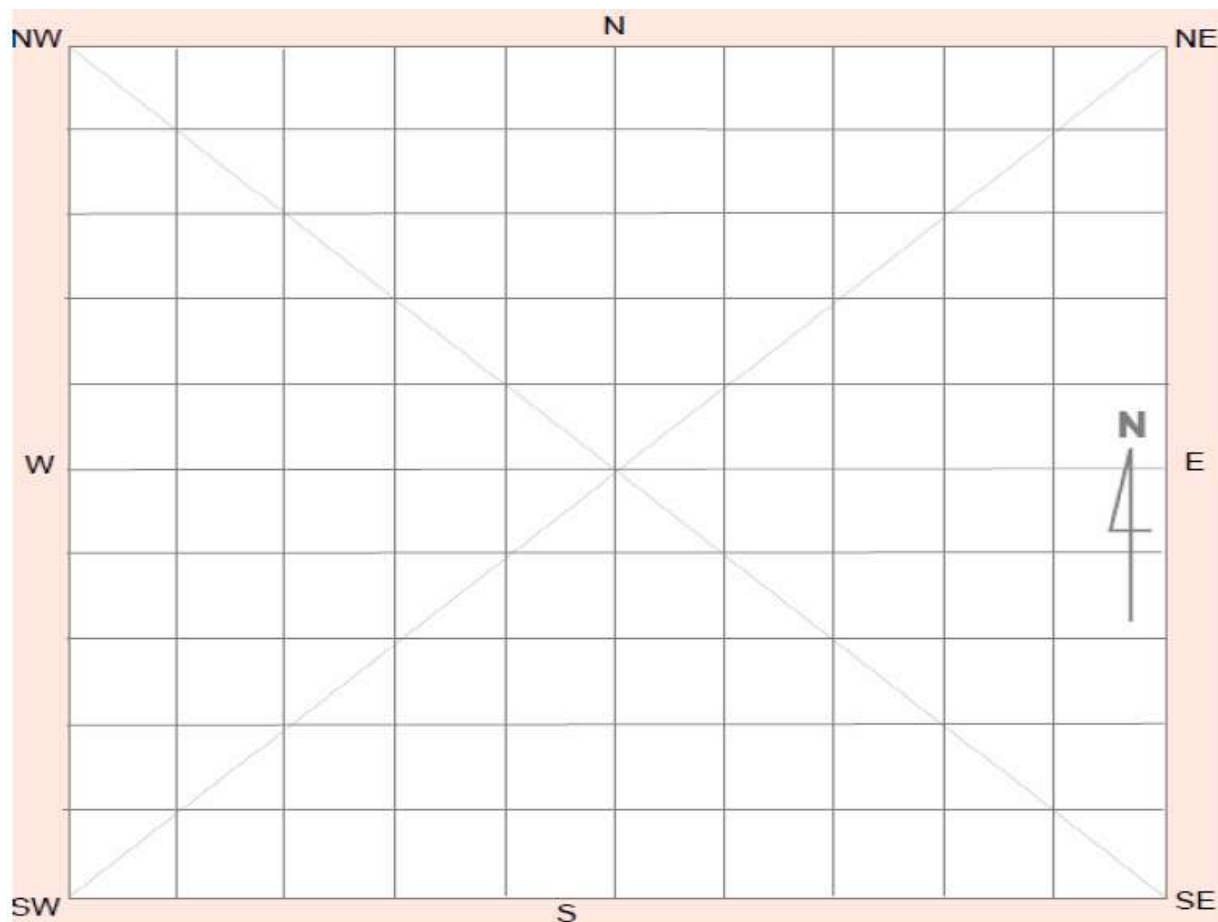
Charlies Point Road OCS-1 is an open camp site located on an unsealed vehicle track on the eastern side of Charlies Point Road. The site is located 534 m west of Dogtrap Creek and comprises two artefacts: one pink silcrete distal flake and a silcrete medial flake (Niche 2018, Appendix 5). No comment on the subsurface potential of the TSC 2 area or Charlies Point Road OCS-1 was provided in the Niche ACHA beyond the general statement provided above, nor was an area of potential archaeological deposit (PAD) defined for targeted investigation via test excavation.

EMM completed test excavation program between 1 October to 3 October 2019. The aim of the test excavation was to investigate the archaeological potential of subsurface deposits more broadly across the proposed disturbance footprint of TSC 2 including excavations targeted in proximity to the location of the Charlies Point Road OCS-1 surface artefacts. A total of 38 test pits (50 cm x 50 cm) were excavated. No artefacts were recovered from excavation. Only one of the two previously recorded Charlies Point Road OCS-1 surface artefacts was able to be relocated.

Surface artefacts identified at Charlies Point Road OCS-1 demonstrate that artefacts have the potential to occur, however the results of the test excavation in identifying no sub-surface archaeological material support the assessment that Aboriginal objects are likely to be in very low density at this location.

Site map

Clearly demarcate the original AHIMS site boundary, show the boundaries of impacted areas and the areas where the site remains in situ. Display map coordinates.



Methodology and results

Summary of the methodology and results of the activity or works undertaken through the authorised impacts, as relevant to the AHIMS site

The test excavation method followed the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010) as follows:

- A series of linear transects (TR) were set out across the TSC 2 ventilation shaft location.
- 50 cm x 50 cm test pits were spaced at 20 m intervals along each transect.
- The first test pit of each transect was dug in 5 cm spits to identify the nature of the soils and to identify if a stratigraphic sequence existed. The remaining pits were dug in 10 cm spits as no stratigraphic sequence was identified.
- Each pit was excavated until basal clay or impenetrable parent rock (ie ironstone and/or shale) was reached.
- All excavated soil was sieved on-site using a dry sieving technique. The soil was sieved through 5 mm aperture sieves.
- All test pits were backfilled by the excavation team after each pit was recorded.

Five linear transects were placed across the area and a total of 38 test pits (50 cm x 50 cm) were excavated.

Soils across the excavation programme consistently comprised of a shallow (<10–15 cm) moderate to highly compacted silty clay loam A soil horizon with frequent gravel inclusions and ironstone nodules, with an underlying dull yellow orange mottled basal clay. The majority of test pits were excavated to a depth of 20 cm, with a sample of test pits excavated to 30 cm.

No artefacts were recovered from excavation.

Only one of the two previously recorded Charlies Point Road OCS-1 surface artefacts was able to be relocated.

Management recommendations

Summary of any management recommendations for the AHIMS site

No sub-surface component of Charlies Point Road OCS-1 was identified as a result of the test excavation and as such no further archaeological excavation is considered to be warranted.

Charlies Point Road OCS-1 was determined to be of low scientific significance. The site should be avoided by the final footprint, however in the event that direct impact to this site cannot be avoided, further management should be undertaken in consultation with a suitably qualified archaeologist and in accordance with an AHMP.

Future management of Charlies Point Road OCS-1 would be limited to surface collection of artefacts if desired by the Aboriginal community during the development of the AHMP.

Post-investigation significance

Discuss if the scientific/archaeological or cultural significance of the site has changed in light of the results of the investigations or works conducted at the site.

Charlies Point Road OCS-1 was assessed by Niche (2018) as having low scientific significance:

"The site contains only a limited number of features and has no potential to meaningfully inform our understanding of the past beyond what it contributes through its current recording (i.e. no or low research potential). The site is representative but unexceptional example of one of the most common class of sites in the region. Many more similar examples can be confidently predicted to occur within the project area, and in the region" (Niche 2018, pp. 61-62).

The findings of the test excavation completed by EMM concur with the previous assessment of low scientific significance, with no further surface material or any sub-surface component to the site identified.

Additional comments

2 Test excavation

2.1 Overview

As part of the ACHA, Niche archaeologists and project RAP representatives conducted archaeological survey over a total of 20 days between 2013 and 2018. Each survey team comprised of two archaeologists and one to two RAP representatives. The survey focused on the proposed disturbance footprint and on sampling landforms above the proposed underground mining area, including rivers, creek lines and large sandstone rock platforms, that have the potential to be affected by subsidence. The survey coverage results indicated that the ground surface visibility conditions during the survey were generally effective to characterise the distribution of archaeological sites across the survey area.

One Aboriginal Dreaming Story and 40 Aboriginal sites were identified within the project area from desktop level, including artefact scatters, isolated finds, axe grinding grooves, modified trees, and sandstone shelters with art and/or deposit. Refer to Chapter 10 of the ACHA (Niche 2018) for further details of the survey results and their implications (Appendix L1 of the EIS).

A total of 13 open camp sites, including 6 artefact scatters and 7 isolated finds were identified by Niche within the project area. Niche (2018, p. 50) note:

the distribution of artefacts in areas of exposure indicated the likely presence of further artefacts in areas with low visibility. It has previously been generally theorized that relatively intact archaeological deposits may be present in the transitional zones between the flats and simple slopes (i.e. foot slopes), alluvial and transferal and/or erosional soils and in association with creeks and tributaries, such as those associated with Dogtrap Creek.

As a result, Niche recommended archaeological test excavation of the disturbance footprint of TSC 2 where Aboriginal site Charlies Point Road OCS-1 was located. Charlies Point Road OCS-1 is an open camp site located on an unsealed vehicle track on the eastern side of Charlies Point Road. The site is located 534 m west of Dogtrap Creek and comprises two artefacts: one pink silcrete distal flake and a silcrete medial flake (Niche 2018, Appendix 5). No comment on the subsurface potential of the TSC 2 area or Charlies Point Road OCS-1 was provided in the Niche ACHA beyond the general statement provided above, nor was an area of potential archaeological deposit (PAD) defined for targeted investigation via test excavation.

The location was selected for test excavation as it represented the only area of proposed ground surface disturbance where an Aboriginal site has been identified and has the potential to be directly impacted. As such, the aim of the test excavation completed by EMM was to investigate the archaeological potential of subsurface deposits more broadly across the proposed disturbance footprint of TSC 2 including excavations targeted in proximity to the location of the Charlies Point Road OCS-1 surface artefacts.

The test excavation program was undertaken over three days from 1 October to 3 October 2019 (inclusive). The program involved four EMM archaeologists and four RAP representatives on each day.

2.2 Method

The test excavation involved the following method:

- A series of linear transects (TR) were set out across the TSC 2 ventilation shaft location.
- 50 cm x 50 cm test pits were spaced at 20 m intervals along each transect.

- The first test pit at each site was dug manually with hand tools in 5 cm spits to identify the nature of the soils and to identify if a stratigraphic sequence existed. The remaining pits were dug in 10 cm spits as no stratigraphic sequence was identified.
- Each pit was excavated until basal clay or impenetrable parent rock (ie ironstone and/or shale) was reached.
- All excavated soil was sieved on-site using a dry sieving technique. The soil was sieved through 5 mm aperture mesh sieves.
- All test pits were backfilled by the excavation team after each pit was recorded.

The results of the test excavation activities at each location are presented below. General photos of the excavation are shown in Plate 2.1 to Plate 2.4.



Plate 2.1 Commencing excavation of TR1



Plate 2.2 Excavation of TR2



Plate 2.3 Excavation of TR4



Plate 2.4 Excavation of TR5

2.3 Location and context

The TSC 2 ventilation shaft site and Aboriginal site Charlies Point Road OCS-1 are located on a level to gently undulating plain landform within the Lucas Heights soil landscape and Mittagong formation geology. The Lucas Heights soil landscape is dominated by 10–20 cm of bleached, stony, hard-setting sandy clay loam topsoil overlying yellow pedal clay which extends to depths of up to 1 m (Hazelton and Tille 1990, p. 37). Ironstone inclusions are

often abundant, especially in elevated positions, and the boundary between the soil materials is clear. The geology of the Mittagong formation is dominated by shallow inter-bedded shale, laminite and fine- to medium-grained quartz sandstone (Hazelton and Tille 1990, p. 37).

Areas of exposure and visibility were primarily limited to an unsealed access track running along the southern boundary which revealed friable silty loam with large amounts of sandstone, ironstone and shale gravel. The area is vegetated by moderate to dense dry sclerophyll open-forest with ground surfaces obscured by grasses, fallen timber and dense leaf litter. Varying degrees of disturbance including earthworks, erosion, and miscellaneous dumping are evident across the area, but areas of significant disturbance are primarily contained within proximity to the unsealed access track and Charlies Point Road which runs along the western boundary. RAPs advised that the area has been utilised in the past as a septic release site, with signposting of such activities still present on neighbouring properties.

The location of Charlies Point Road OCS-1 was inspected, with only one of the two previously recorded artefacts able to be relocated (refer to Plate 2.5 to Plate 2.8).



Plate 2.5 Charlies Point Road OCS-1 pink silcrete artefact



Plate 2.6 Charlies Point Road OCS-1 pink silcrete artefact



Plate 2.7 Location of Charlies Point Road OCS-1 artefact (view north-east)



Plate 2.8 Location of Charlies Point Road OCS-1 artefact (view north)

2.4 Test pit layout

Five linear transects were placed across the area as per Table 2.1 and Figure 2.1. A total of 38 test pits (50 cm x 50 cm) were excavated amounting to 9.5 m² total excavation area. No artefacts were recovered from excavation.

Table 2.1 Test excavation results

Transect	Orientation	Test pits	Artefacts	Comment
1	East-west	10	0	Transect set out parallel to the existing access track where surface artefacts were identified however with sufficient setback to avoid obvious disturbances.
2	North-south	8	0	Transect set out extending perpendicular to location of surface artefacts.
3	North-south	8	0	Transect set out parallel to eastern boundary of TSC 2 disturbance footprint.
4	East-west	6	0	Transect set out parallel to northern boundary of TSC 2 disturbance footprint.
5	East-west	6	0	Transect set out running through the centre of TSC 2 disturbance footprint.

2.5 Soils and depth

Soils across the excavation programme consistently comprised of a shallow (<10–15 cm) moderate to highly compacted silty clay loam A soil horizon with frequent gravel inclusions and ironstone nodules, with an underlying dull yellow orange mottled basal clay. The majority of test pits were excavated to a depth of 20 cm, with a sample of test pits excavated to 30 cm. Transect locations and sample test pit profiles are shown in Plate 2.9 to Plate 2.18.



Plate 2.9 View along TR1 from SQ1 (view west)



Plate 2.10 TR1 SQ9 (north profile)



Plate 2.11 View along TR2 from SQ1 (view north)



Plate 2.12 TR2 SQ3 (north profile)



Plate 2.13 View along TR3 from SQ1 (view north)



Plate 2.14 TR3 SQ3 (north profile)



Plate 2.15 View along TR4 from SQ1 (view west)



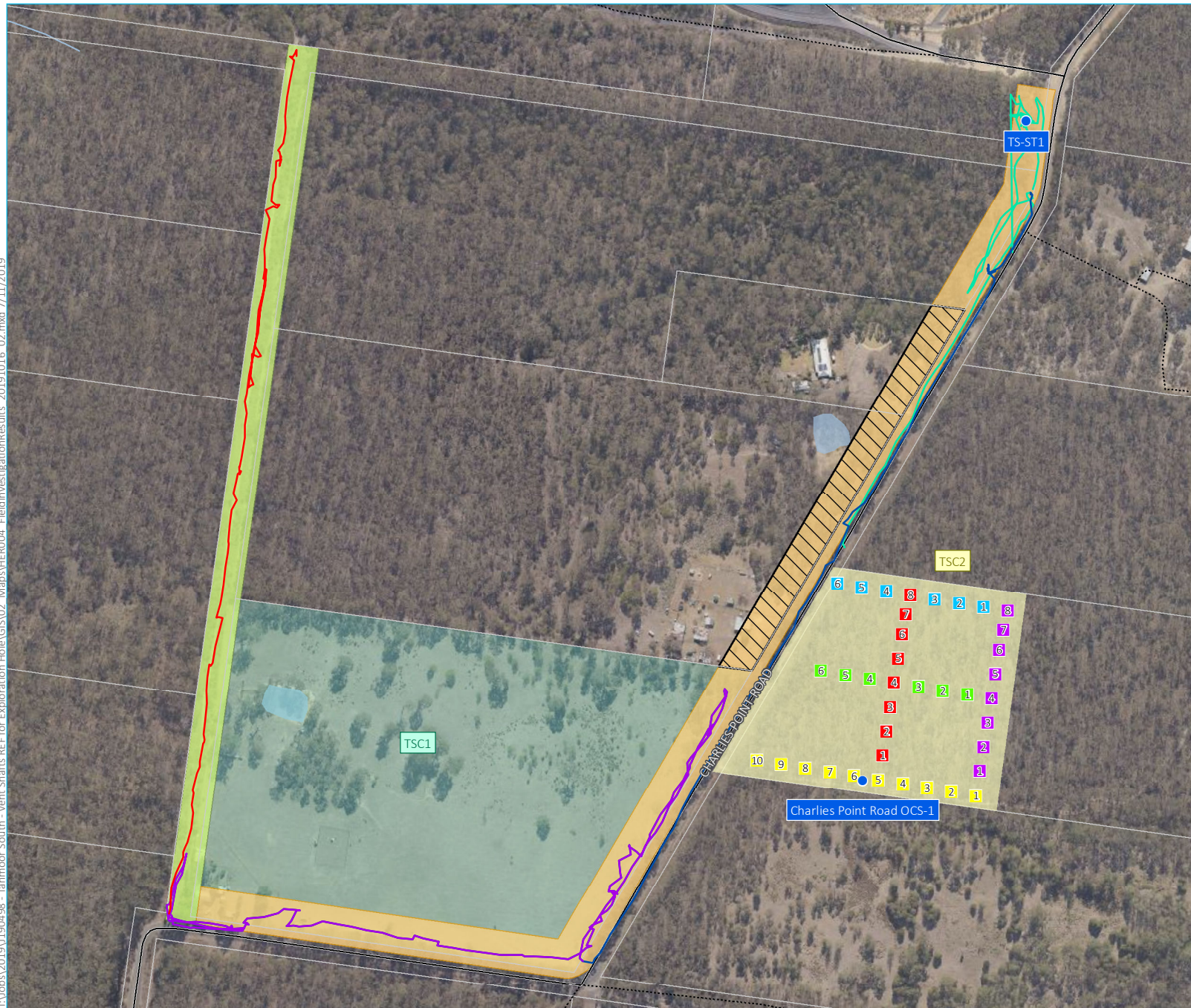
Plate 2.16 TR4 SQ2 (north profile)



Plate 2.17 View along TR5 from SQ1 (view west)



Plate 2.18 TR5 SQ5 (north profile)



- KEY**
- Local road
 - Vehicular track
 - Watercourse/drainage line
 - Waterbody
 - Cadastral boundary
 - TS2 area
 - TSC1 operational layout
 - Aboriginal heritage site
- Survey areas**
- Existing powerline easement
 - Proposed powerline easement
 - Omitted from survey - land access constraints
- Survey transect**
- Transect 1 (TS1)
 - Transect 2 (TS2)
 - Transect 3 (TS3)
 - Transect 4 (TS4)
- Test excavation transect**
- Transect 1 (TS1)
 - Transect 2 (TS2)
 - Transect 3 (TS3)
 - Transect 4 (TS4)
 - Transect 5 (TS5)

Field investigation results

Tahmoor Coal
Tahmoor South Project Addendum
Figure 2.1

2.6 Assessment of archaeological potential

Archaeological potential is expressed as being low, moderate, high or no potential. These terms refer to the likelihood of recovering subsurface Aboriginal objects and are defined as follows:

- **low potential:** it is against expectation for Aboriginal objects to occur;
- **moderate potential:** Aboriginal objects could occur but in an uneven or highly clustered manner;
- **high potential:** Aboriginal objects almost certainly occur throughout the identified area; and
- **no potential:** Aboriginal objects cannot occur unless artificially imported— typically because of the artificial landform.

Based on the predictive model and results as outlined in the ACHA, archaeological resources of the area are more likely to be concentrated in closer proximity to water sources (ie within 200 m) and in association with rock outcrops (ie shelter sites). The location of the disturbance footprint of TSC 2 and Aboriginal site Charlies Point Road OCS-1 is 500 m from the nearest water source (Dogtrap Creek) and is situated on a featureless, plain landform within which focal points for past activity cannot be readily defined.

The archaeological potential of the TSC 2 area has been assessed as low to moderate. Surface artefacts identified as Charlies Point Road OCS-1 demonstrate that artefacts have the potential to occur, however the results of the test excavation in identifying no archaeological material support the assessment that Aboriginal objects are likely to be in very low density.