

# **Aboriginal Cultural Heritage Management Plan**

## **Carlingford West Public School and Cumberland High School**

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Prepared for School Infrastructure NSW

February 2024

# Aboriginal Cultural Heritage Management Plan

## Carlingford West Public School and Cumberland High School

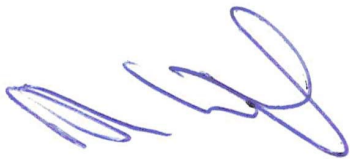
School Infrastructure NSW

E220118 RP#3

February 2024

Version	Date	Prepared by	Approved by	Comments
1	12 July 2023	Georgia Burnett	Alan Williams	Draft
2	15 November 2023	Georgia Burnett	Alan Williams	Incorporating project conditions
3	6 December 2023	Alan Williams	-	Minor updates
4	16 February 2024	Alan Williams	-	Minor updates

Approved by



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# This document at a glance

## ES1.1 Purpose of document

The Department of Education (DoE) intends to refurbish and upgrade Cumberland High School (CHS) and Carlingford West Public School (CWPS) - collectively referred to as the Cumberland Cluster - at 59-73 Felton Road and 183 Pennant Hills Road, Carlingford. As part of the approval for this project, an Aboriginal cultural heritage management plan (ACHMP) is required to provide a framework for managing Aboriginal heritage during the pre-construction and construction phases of the project.

This document has been developed to address these conditions. To conform with the conditions B18, B30, C27 and C28 of the approval, the proponent commits to implementing the requirements of the ACHMP prior to and during the proposed development activities.

## ES1.2 Summary of Aboriginal heritage

Previous investigation has identified one Aboriginal site within the project area (and labelled as 'CWPS IF1' [#45-6-4093]). This consisted of a singly silcrete stone artefact found on the current surface in the northwestern corner of the project area. The site was identified a part of broader activities across the Cumberland Plain; and as such was identified as of low significance.

The proposed development would have adverse impacts to CWPS IF1.

## ES1.3 Project specific Aboriginal heritage requirements

One project specific mitigation measure is required **prior to and during the construction phase**. This is:

- N/A - complete

## ES1.4 General Aboriginal heritage requirements

The ACHMP outlines a number of general requirements to be implemented **during construction** (Section 4):

- requirements for establishing and maintaining suitable cultural inductions and awareness for all contractors and visitors during the project (Section 4.3.1);
- protocols and procedures for unexpected finds, such as skeletal/human remains (Section 4.3.2); and
- protocols for undertaking activities in areas that have not been previously assessed (Section 4.5).

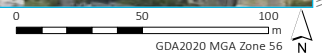
## ES1.5 Other useful information

The ACHMP also provides guidance on:

- processes to maintain ongoing consultation with the project's registered Aboriginal parties (RAPs) and Heritage NSW (Section 2); and
- other administrative requirements, including ongoing compliance, regular review and update of the ACHMP to ensure its functionality is maintained through the project (Section 5).



Source: EMM (2023); DFSI (2022); MetroMap (2023)



**KEY**

- Where ACHMP applies
- Project specific requirements (artefact collection)
- Project specific requirements (archaeological field survey and artefact collection); general management requirements (including cultural inductions, unexpected finds and additional assessment where necessary)

**Summary of Aboriginal heritage management requirements**

Cumberland High School  
Aboriginal Cultural Heritage Management Plan  
Figure ES1

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# 1 Introduction

## 1.1 Purpose of document

The Department of Education (DoE) intends to refurbish and upgrade Cumberland High School (CHS) and Carlingford West Public School (CWPS) - collectively referred to as the Cumberland Cluster - at 59-73 Felton Road and 183 Pennant Hills Road, Carlingford (hereafter 'project area') (Figure 1.1). As part of the assessment process needed to obtain the approval for these works to proceed, investigation of Aboriginal cultural heritage for the project area was undertaken by EMM Consulting Pty Limited (EMM).

These previous investigations consisted of an Aboriginal Cultural Heritage Assessment (ACHA) developed in consultation with the local Aboriginal community and included a range of on-site investigations to identify tangible and intangible cultural heritage (EMM 2023). Further details of the report and its findings are presented in Section 3.1. The report recommended that an Aboriginal cultural heritage management plan (ACHMP) be developed following the approval to provide a framework for managing Aboriginal heritage during the pre-construction and construction phases of the project. This recommendation has now been included as a condition in the State Significant Development Approval (SSDA) (Section 1.1.1), and the proponent must implement the ACHMP approved by the Planning Secretary.

This document has been developed to address approval conditions, and provides guidance on:

- processes to maintain ongoing consultation with the project's registered Aboriginal parties (RAPs) and Heritage NSW (Section 2)
- management procedures for Aboriginal cultural heritage values within, and adjacent to, the project area during pre-construction and construction phases (Section 4)
- protocols and procedures for unexpected finds, such as human remains (Section 4.3)
- protocols for undertaking activities in area areas that have not been previously assessed (Section 4.5)
- other administrative requirements, including post-project management of Aboriginal finds and recovered material, ongoing compliance, regular review and update of the ACHMP to ensure its functionality is maintained through the project (Section 5).

To conform with the conditions B18, B30, C27 and C28 of the approval, the proponent commits to implementing the requirements of the ACHMP prior to and during the proposed development activities.

### 1.1.1 Legislative context

The project has been assessed and approved under State Significant Development (SSD) as defined in the *Environmental Planning and Assessment Act 1979*. The Department of Planning and Environment (DPE) has provided the following identifier for the approval: **SSD #43065987**.

Aboriginal heritage is managed under the *National Parks and Wildlife Act 1974*. The SSD process 'switches off' a number of requirements under this Act, including the need to obtain Aboriginal heritage impact permits (AHIP) to harm Aboriginal objects. Rather, Aboriginal heritage is managed by the Conditions of Approval (CoA) provided in the SSDA (Table 1.1).

A range of other Commonwealth and State legislation also applies to Aboriginal heritage, although none have been identified as pertinent to this project. These are further outlined in the ACHA (EMM 2023).

**Table 1.1 The project conditions of the SSDA that this document applies to**

Requirement	Section addressed
<p>B18. The Aboriginal Cultural Heritage Management Sub-Plan must be prepared in accordance with the recommendations and consultation undertaken in the Aboriginal Cultural Heritage Management Plan, version 2.1 prepared by EMM and dated 7 September 2022</p>	<p>This report has been prepared using the direction and requirements outlined in the Aboriginal cultural heritage assessment (September 2022).</p>
<p>C28. Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Management Sub-Plan required by condition B18.</p>	<p>Entire report, and specifically Section 4.</p>
<p>C29. In the event that surface disturbance identifies a new Aboriginal object:</p> <ul style="list-style-type: none"> <li>(a) all works must halt in the immediate area to prevent any further impacts to the object(s);</li> <li>(b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects;</li> <li>(c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS;</li> <li>(d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and</li> <li>(e) works may only recommence with the written approval of the Planning Secretary.</li> </ul>	<p>Section 4.3.2 outlines unexpected finds protocols analogous with this condition.</p>



## 1.2 Key stakeholders

This section outlines the project team that will be involved in the project and Aboriginal stakeholder individuals and/or organisations relevant to the project (Table 1.2).

**Table 1.2 Key stakeholder contact details**

Personnel	Organisation	Role	Telephone contact	E-mail contact
<b>Project team</b>				
Jose Soares*	Schools Infrastructure NSW	Project Director	0460 016 990	Jose.Soares4@det.nsw.edu.au
Kate-Lee Carter	Savills Australia	Project manager	0455 663 176	klcarter@savills.com.au
David McDonnell*	Roberts Co	Principal Contractor	0452 072 580	david.mcdonnell@au.roberts.co
Alan Williams	EMM	Heritage consultant	0438 104 740	awilliams@emmconsulting.com.au
Corey O'Driscoll	Heritage NSW	Heritage regulator	02 6229-7079	Corey.ODriscoll@environment.nsw.gov.au
Jenny Chu	DPE	Planning regulator	02 8275 1327	jenny.chu@planning.nsw.gov.au
<b>Registered Aboriginal parties</b>				
Nathan Moran	Metropolitan Local Aboriginal Lands Council	Aboriginal representative	02 8394 9666	metrolalc@metrolalc.org.au
Richie Howitt	Dharug Stategic Management Group	Aboriginal representative		admin@dsmg.org.au
Lily Carroll	Didge Ngunawal Clan	Aboriginal representative	0426 823 944	didgengunawalclan@yahoo.com.au
Rodney Gunther	Waawaa Awaa Aboriginal Corporation	Aboriginal representative	0410 580 962	waawaa.awaa@gmail.com
Lee Field	BCS Group	Aboriginal representative	0421 314 892	barrabyculturalservices@gmail.com
Adam Gunya	Gunya Aboriginal Cultural Heritage Services PTY LTD	Aboriginal representative	0492 232 606	gunya.ach@gmail.com
Krystle Carroll-Elliott	Ginninderra Aboriginal Corporation	Aboriginal representative	0451 016 224	Ginninderra.corp@gmail.com
Shayne Dickson	Gunjeewong Aboriginal Corporation	Aboriginal representative	0421 636 474	Gunjeewongculturalheritage21@hotmail.com
Marilyn Carroll-Dickson	Corroboree Aboriginal Corporation	Aboriginal representative	0415 911 159	corroboreecorp@bigpond.com
Bo Field	Yurrandaali Cultural Services	Aboriginal representative	0403 048 263	yurrandaali_cs@hotmail.com

**Table 1.2 Key stakeholder contact details**

<b>Personnel</b>	<b>Organisation</b>	<b>Role</b>	<b>Telephone contact</b>	<b>E-mail contact</b>
Ryan Johnson	Murrabidgee Mullangari	Aboriginal representative	0475 565 517	murrabidgeemullangari@yahoo.com.au
Caroline Hickey	Indigenous Heritage Services	Aboriginal representative	0411 650 057	Cazadirect@live.com
Jesse Johnson	Muragadi	Aboriginal representative	0418 970 389	muragadi@yahoo.com.au
Jenny Beale	Butucarbin Cultural Heritage	Aboriginal representative	(02) 9832 7167	butuheritage@gmail.com
Justine Coplin	Darug Custodian Aboriginal Corporation	Aboriginal representative	02 4577 5181	justinecoplin@optusnet.com.au
Steven Randall	Deerubbin LALC	Aboriginal representative	(02) 4724 5600	reception@deerubbin.com.au

Note: \* It is the responsibility of these individuals to ensure the ACHMP is implemented, adopted and maintained through the project.



Source: EMM (2023); DFSI (2022); MetroMap (2023)

- KEY**
- Where ACHMP applies
  - Named watercourse
  - Cadastral boundary

0 100 200  
m  
GDA2020 MGA Zone 56  
N

Areas to which this ACHMP applies

Cumberland High School  
Aboriginal Cultural Heritage Management Plan  
Figure 1.1



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## 2 Aboriginal consultation

### 2.1 At a glance

- This project has an established list of registered Aboriginal parties (RAPs) that require ongoing consultation during the pre-construction and construction phases of the project. A list of the stakeholders and their contacts are presented in Table 1.2.
- The RAPs require consultation during the finalisation of, and any updates to, the ACHMP; as part of any cultural inductions; as part of project specific heritage mitigation activities, and in the event of any unexpected finds being encountered. Timing for notification of each of these activities is provided in Table 2.1.
- Table 2.2 provides a list of dates that are important to the Aboriginal community, and during which works requiring their participation should be delayed/cancelled to avoid any potential conflict.

### 2.2 Consultation up to the SSD approval

As a requirement of the assessment process, the ACHA undertook Aboriginal consultation in accordance with Heritage NSW's *Aboriginal Cultural Heritage Consultation Requirements for Proponents*. This process required the identification and notification of the local Aboriginal community to identify individuals and/or organisations that had an interest in the project, and which identified nine individuals and/or organisations (Table 1.2).

Identified as registered Aboriginal parties (RAPs), these 15 individuals and/or organisation were provided opportunities to review Aboriginal heritage documentation, including the ACHA, and participating in the on-site activities. As part of the ACHA process, a range of feedback around post-approval requirements was provided by the RAPs, and this has been integrated into this document.

### 2.3 Consultation for this ACHMP

A draft copy of this ACHMP was sent to identified RAPs listed in Table 1.2 on 15 November 2023 for a 21-day review period (Appendix A.2). All comments received supported the ACHMP and its contents, and are in Appendix A.

### 2.4 Consultation required following the SSDA

Table 2.1 provides the required Aboriginal consultation to be implemented prior to, and during construction activities. Any Aboriginal consultation undertaken as part of these activities must be documented in Appendix A during the lifetime of the project. Any updated information is to be included in future revisions of the ACHMP.

Table 2.2 provides a list of dates that are culturally sensitive, and when works requiring Aboriginal heritage input and/or participation should be avoided where possible.

**Table 2.1 Aboriginal consultation to be undertaken as part of the project**

Project stage	Activity	Type and preferred method of communication	Comment period to be provided
Pre-construction	Development of ACHMP	Distribution of this document to the RAPs for three weeks to provide review and comment. An offer of a face-to-face and/or online meeting with RAPs to discuss the ACHMP and its contents should be made during this comment period.	3 weeks
	Finalisation of ACHMP	Provision of final report via e-mail and/or post prior to its implementation.	1 week
Pre-construction/ construction	Updates to the ACHMP (as required)	Initial notification via phone/e-mail to advise of proposed update. Provision of updated ACHMP for review and inputs via e-mail and/or post. Where significant changes are proposed, a face-to-face meeting will be offered.	3 weeks
	Additional assessment outside of approved areas (as required)	Initial notification via phone/e-mail to advise of proposed areas outside of approved project area. Provision of a detailed description, including appropriate maps, of the new areas and proposed assessment methods and reporting. Where significant changes are proposed, a face-to-face meeting and/or on-site investigations will be offered.	3 weeks
	Archaeological surface collection	An opportunity for two RAPs to inspect the project area prior to any construction and collect any cultural material that is observed (Section 4). Initial notification via phone/e-mail to advice of the schedule of the proposed program, followed by further details, timing, personnel required, and relevant engagement and subcontract documentation, etc, via e-mail/post.	2 weeks
Construction	Cultural awareness inductions	Request for a representative to conduct inductions will be made at least 7 days prior to the required date via phone and/or e-mail.	Ongoing, with a minimum of one week's notice when required
	Unexpected finds	Contact all RAPs via phone and e-mail to advise of any unexpected finds and proposed management. This may include invitation to undertake on-site observations and/or face-to-face meetings where significant cultural materials, such as human remains are discovered.	Within 2 days of find
	Non-conformance (see Section 5.2.3)	Initial notification/discussion via phone and e-mail followed by provision of documentation for review as required. This would be followed by on-site observations and/or face-to-face meetings where determined to be significant	≤1 week
	Other activities as required	Initial notification/discussion via phone and e-mail followed by provision of documentation for review as required. Where significant or major changes, suitable face-to-face meetings and/or on-site observation will be provided.	≥2 weeks

Notes: \*Additional time may be required during particularly busy periods.

**Table 2.2** Culturally sensitive dates during which activities requiring Aboriginal heritage inputs/participation should be avoided

Dates	Activity	Description
26 January	Australia/Invasion Day	The public holiday and surrounding days are increasingly seen as a time of trauma for Aboriginal people, and any work activities should be re-scheduled to avoid this date.
27 May – 3 June	National Reconciliation Week, includes Sorry Day	A week during which Australians are encouraged to learn about shared histories, cultures, and achievements, and to explore how one can contribute to achieving reconciliation in Australia. Aboriginal people are often committed to activities during this week and will often be unavailable.
First Sunday – Second Sunday July	NAIDOC week	A week during which Australians are encouraged to celebrate Aboriginal history, cultural and achievements. Aboriginal people are often committed to activities during this week and will often be unavailable.
-	Sorry business	Sorry business is when a member of the Aboriginal community has passed away, and includes the funeral, mourning period and other related associated activities. The timing for these are unknown and can be variable, but when advised that there is Sorry business, the project activity should be postponed.

## 3 Aboriginal cultural heritage within the project area

### 3.1 At a glance

- The ACHA undertaken as part of the SSI assessment identified one Aboriginal site within the project area (and labelled as CWPS IF1 [AHIMS #45-6-4093]). This consisted of an isolated stone artefact in the northwestern corner of the project area. Additional investigation of the artefact did not identify any cultural materials surrounding the site.
- The proposed development would have adverse impacts to CWPS IF1.
- As part of the ACHA process, additional archaeological actions were discussed and have been integrated into the ACHMP, including collection of surface cultural material. While additional test excavations and/or monitoring was initially proposed, these were implemented as part of the ACHA, and no longer required.

### 3.2 Summary of Aboriginal heritage

As part of the SSD assessment, an ACHA was undertaken in broad accordance with Heritage NSW guidelines. This included consultation with the Aboriginal community, desktop review of the regional archaeological record, and on-site investigations (field survey and test excavations) to identify and assess the cultural heritage within the project area.

The desktop information from the broader region indicates that the cultural material where present, would be primarily in the form stone artefacts. These may be present on the surface or in the upper soil profile (<50 cm below current surface). These would generally be found associated with water resources, the closest being Hunts Creek, ~200 m north of the project area. However, the site was noted to have been heavily disturbed by the extensive school buildings and infrastructure established across the project area.

Archaeological survey resulted in the identification of one Aboriginal site within the project area. This site was an isolated stone artefact located in the north-western corner of CWPS, which was a lesser disturbed portion of the site. For management purposes, it has been registered on the AHIMS database as CWPS IF1. CWPS IF1 reflects an ephemeral or transient use of the local area in the past. For the most part, it is representative of the types of archaeological sites that are frequently identified across the Cumberland Plain, being evidence of a low density of background material.

An archaeological test excavation was undertaken in the vicinity of CWPS IF1 to determine whether additional cultural materials were present. These focussed on the relatively undeveloped portion of the northwestern corner of the project area. These investigations failed to identify any further cultural materials and demonstrated a heavily disturbed and shallow soil profile. Based on these works, it was considered that CWPS IF1 reflected a single disparate stone artefact, and was not part of a broader cultural deposit.

The ACHA concluded that the site was of low significance, with mitigation measures including its recovery prior to impact.

No site-specific intangible or cultural values were provided during the ACHA process, and the proposed works was therefore considered unlikely to impact these places based on current evidence.

### 3.3 Aboriginal sites and/or deposits

Table 3.1 presents a summary of the Aboriginal objects and places identified within the project area. These are presented in Plates 3.1-3.4 inclusive and Figure 3.1.

**Table 3.1** Aboriginal objects, sites and places documented within the project area.

AHIMS #	Site name	Site type	Archaeological significance	Description
45-6-4093	CWPS IF1	Isolated stone artefact	Low	Red silcrete flake found in exposure in northwest corner of the project area.



**Plate 3.1** The location of CWP IF 1 looking northeast



**Plate 3.2** The red silcrete flake identified as CWPS IF 1.



**Plate 3.3** Alternate view of CWP IF1



**Plate 3.4** Alternate view of CWP IF1



### 3.4 Potential impacts

The project design will adversely affect one isolated stone artefact (Table 3.2, Figure 3.2).

**Table 3.2 Summary of potential impacts to Aboriginal sites and objects.**

<b>AHIMS ID</b>	<b>Site name</b>	<b>Proposed activity causing harm</b>	<b>Degree of harm</b>
45-6-4093	CWPR IF1	Construction activities in the vicinity of the proposed CWPS buildings	Complete



Source: EMM (2023); DFSI (2022); MetroMap (2023)

**KEY**

- Where ACHMP applies
- Identified Aboriginal site
- Major road

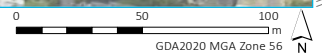
Existing archaeological resource  
for the project area

Cumberland High School  
Aboriginal Cultural Heritage Management Plan  
Figure 3.1

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Source: EMM (2023); DFSI (2022, 2021); MetroMap (2022)



- KEY**
- Project area
  - Identified Aboriginal site
  - Proposed precinct site plan
  - Major road

Project impacts to identified Aboriginal heritage

Cumberland High School  
Aboriginal cultural heritage management plan  
Figure 3.2

## 4 Mitigation and management

### 4.1 At a glance

- Project specific mitigation measures are required **prior to the construction phase**. These include:
  - additional archaeological field survey for artefact collection across the project area and associated activities approved under the SSD in accordance with methods outlined in Section 4.2.1.
- A number of ongoing general post-approval heritage requirements are required **during construction and initial operational phases**. These are outlined in detail in this section and include the need to implement suitable cultural heritage inductions for all on-site personnel, protocols in the event that unexpected cultural materials are found; and processes in the event that areas outside the approved project area require development activities.

### 4.2 Project specific requirements

The ACHA identified an Aboriginal site that would be adversely affected by the proposed activity. As such, a range of mitigation requirements are proposed to offset these impacts (Figure 4.1). This section outlines the specific activities and timing of these requirements.

#### 4.2.1 Artefact collection

N/A – artefact collection was completed in January 2024.

Analysis and reporting as per Appendix B.1.7. and curation of the cultural materials as per Section 4.4. are still required and ongoing.

#### 4.2.2 Archaeological excavations

N/A

#### 4.2.3 Cultural monitoring

N/A

#### 4.2.4 Timing

Typically, archaeological mitigations are best undertaken during pre-construction prior to any construction activities that may affect surface and/or shallowly buried cultural materials.

Specifically, the following timing must be adopted:

- Pre-construction
  - N/A
- Construction
  - N/A

## 4.3 General requirements

The following sections outline a range of general cultural heritage process and procedures that must be implemented during the construction phase of the project (Figure 4.1).

### 4.3.1 Cultural heritage inductions

All employees, contractors, sub-contractors involved in ground-disturbing activities will undergo an Aboriginal cultural heritage induction. For key project team members, this will be conducted by the lead contractor using documentary details sought from, and provided by, the RAPs. In this situation, periodic involvement of the RAPs to ensure the quality and relevance of cultural inductions is being maintained must be undertaken through the project construction phase.

The cultural heritage induction/relevant sub-component of the site induction will be planned in consultation with RAPs, and will seek input from RAPs regarding appropriate materials for input and key issues that RAPs would like raised to all inductees. The following points will be conveyed through site induction material:

- Aboriginal sites and places have been identified across the region
- Aboriginal sites and places are of significance to the Aboriginal community, are important to the wider community and must be treated with respect
- Aboriginal sites are protected by law and that project approval includes conditions allowing impacts to certain specified Aboriginal sites in accordance with this ACHMP (see Appendix B)
- Aboriginal sites have included isolated stone artefacts and stone artefact scatters
- Aboriginal sites can be hard to recognise, but a range of photographs giving examples will be provided to inductees to show the types of material that may be expected
- that there are unexpected finds procedures which involve stopping work if suspected cultural materials or skeletal material/human remains is identified on-site.

In addition, visitors to the project and general contractors not involved in ground-disturbing activities will be made aware of their obligation to avoid harm to cultural heritage through a cultural heritage component of the general site induction. Records of these inductions will be kept by the lead contractor.

### 4.3.2 Unexpected finds protocols

#### i Discovery of Aboriginal artefactual materials

Table 4.1 sets out the measures that will require implementation in the event that any previously unidentified cultural material is identified during the pre-construction, construction and/or operational phases of the project. Appendix C provides a description of the types of Aboriginal site that may be encountered during the project.

The recording of, and any proposed mitigation measures, will be completed by a heritage professional(s) with participation from the RAP representatives (see Table 1.2 and Section 2.3). Avoidance of newly identified Aboriginal objects is always the preferred heritage outcome where feasible. Mitigation measures will only be employed when it can be reasonably demonstrated that avoidance is not possible. Heritage NSW must be notified about any plans to move, collect or salvage newly identified sites (Table 4.1; Appendix B).

Where avoidance can be achieved, the following management of the cultural materials will be adopted:

- within 20 m of the development footprint, the find will be managed through active protection using suitable fencing (eg star pickets, stakes and wire, bollards, concrete blocks, etc.) and appropriate signage (eg 'no access' and/or 'heritage site'). These measures will be established by a heritage professional with the participation of the RAPs; and/or
- over 20 m from the development footprint, no fencing, signage or active land management measures are required for these sites. Suitable recording of the site must be undertaken by a heritage professional and representatives of the RAPs (Appendix B). The site/s must be integrated into the cultural inductions (Section 4.3.1) to ensure all personnel are aware of the location and to avoid inadvertent impacts during the construction.

#### ii [Discovery of skeletal/human remains](#)

In the event that known or suspected human skeletal remains are encountered during the project, the following procedure presented in Table 4.2 must be applied.



Source: EMM (2023); DFSI (2022, 2021); MetroMap (2022)



- KEY**
- Where ACHMP applies
  - Major road
  - Project specific requirements (artefact collection)
  - Project specific requirements (archaeological field survey and artefact collection); general management requirements (including cultural inductions, unexpected finds and additional assessment where necessary)

Summary of Aboriginal heritage management requirements

Cumberland High School  
Aboriginal cultural heritage management plan  
Figure 4.1



\\emmsvr1\EMM\2022\E220118 - Cumberland High School\GIS\02\_Maps\ACHMP\005\_ManagementRequirements\_20230707\_01.mxd 7/07/2023

**Table 4.1 Management of unexpected cultural materials (except skeletal/human remains)**

**Protocols to follow**

---

- All works within the location of the Aboriginal object/s must stop.
  - The person who identified the Aboriginal objects must immediately notify the person in charge of the activity eg Senior Project Manager, Foreman, Environmental Representative. The responsible person should contact School infrastructure NSW as soon as possible.
  - All construction that could potentially harm the Aboriginal objects or values must cease (including stopping all construction within at least 20 m). Only construction that is required to make the area safe is permissible.
  - The Aboriginal object/s is to be protected with the establishment of a no-go zone.
  - Contact the project heritage consultant (Section 1.2) and RAPs (see Section 2.3) to lead the subsequent management of the find.
  - Consideration of avoidance of the cultural materials should be undertaken. Where avoidance **can** be achieved, implement the following:
    - where the find is within 20 m of the development footprint, the find will be managed through active protection using suitable fencing (eg star pickets, stakes and wire, bollards, concrete blocks, etc) and appropriate signage (eg ‘no access’ and/or ‘heritage site’). These measures should be established by a heritage professional with the participation of the RAPs; and/or
    - where the find is over 20 m from the development footprint, no fencing, signage or active land management measures are required for these sites. Suitable recording of the site must be undertaken by a heritage professional and representatives of the RAPs (Appendix B). The site/s must be integrated into the cultural inductions (Section 4.3.1) to ensure all personnel are aware of the location and to avoid inadvertent impacts during the construction.
  - Where avoidance **cannot** be achieved, determine the most appropriate course of action based on below in consultation with the RAPs, project archaeologist and as necessary, Heritage NSW:
    - For isolated Aboriginal object (eg stone artefacts, shell fragments, etc) found in disturbed contexts, the site should be recorded as found (see Appendix B), and subsequently collected by a heritage professional with participation of the RAPs.
    - Where intact cultural deposits are identified with any Aboriginal objects by the heritage professional, additional archaeological excavations should be undertaken prior to any further work in the area. Excavations should include an initial investigative phase to characterise the site, followed by a more extensive salvage excavation where significant cultural material is identified. Excavation methods that can be used as a guide are presented in Appendix D.
  - Once the archaeological on-site activities are complete to the satisfaction of the heritage professional in consultation with the RAPs and Heritage NSW, written approval from the Planning Secretary, DPE must be obtained to allow works to resume.
  - All archaeological activities should ensure suitable analysis of any cultural materials, chronological, palaeoenvironmental and sedimentological samples collected are suitably analysed and documented in a report that is provided to Heritage NSW (see Appendix B). This should include submission of the identified cultural materials and findings to the Heritage NSW Aboriginal Heritage Information Management System.
-



**Table 4.2 Management of unexpected skeletal/human remains**

**Protocols to follow**

---

- All work must **STOP** in the vicinity of the remains. The remains must be left in place and protected from further harm or damage. All construction that could potentially harm the human remains must cease. Only construction that is required to make the area safe is permissible.
  - The person who identified the human remains must immediately notify the person in charge of the activity (eg Project Manager, Foreman, Environmental Representative).
  - The human remains are to be protected with the establishment of a no-go zone.
  - The person in charge shall take photographs with scale (without touching any remains) and provide them to the heritage consultant and seek initial advice. If uncertain or probable human identification, proceed with next steps.
  - The person in charge will notify NSW Police of the discovery as soon as possible. All subsequent steps will be dictated by the NSW Police.
    - Police contact: Eastwood police station – T: (02) 9858 9299.
  - Contact the project heritage consultant (Section 1.2) and RAPs (see Section 2.3) to brief them on the evolving situation.
  - If the NSW Police advise that the human remains are of ancestral Aboriginal origin, and indicate that they will not investigate, the person in charge will contact the project heritage consultant (Section 1.2) and RAPs (see Section 2.3) to lead the subsequent management of the find. Heritage NSW (T: 131 555) will also be notified.
  - All future management of the human remains is to be determined by the RAPs. As such, discussion between the RAPs, project heritage consultant, the proponent and contractor will be organised as soon as possible. Once an agreement on the subsequent management of the find is undertaken, Heritage NSW will be advised of the proposed course of action to be implemented.
  - Discussions will include consideration and resolution of the following:
    - If needed; further investigation to understand the extent, distribution and characteristics of the human remains. Where required, the heritage professional in close consultation with the RAPs, and participation of a physical anthropologist, will establish the investigation area and define protocols and excavation methods to be adhered to during such investigation.
    - Avoidance and/or project redesign to ensure the human remains can be left unaffected by the works.
    - Where avoidance cannot be achieved, the suitable recovery and relocation of the human remains. Where required, the heritage professional in close consultation with the RAPs, and participation of a physical anthropologist, will establish the investigation area and define protocols and excavation methods to recover and move the remains.
    - Whether scientific research is desired by the RAPs to provide further context of the remains (eg age of individual, how they died, gender, time of burial, etc).
    - If relocation is determined, identify a suitable re-burial location, and ensure the necessary discussions and agreements are in place for the re-burial to occur. Where the RAPs permit, a temporary storage location may be considered while the final location is resolved.
  - Once the on-site activities associated with the human remain are complete to the satisfaction of the heritage professional in consultation with the RAPs, construction activities may continue.
  - Once the agreed management activities are implemented and completed, ensure suitable analysis (as required) of the remains, and formal reporting is developed to be provided to Heritage NSW (Appendix B).
-

### 4.3.3 Changing heritage professional

Where the heritage consultant changes through the project, suitable hand over will be undertaken to minimise loss or mistranslation of the intent of the information, findings and future steps in relation to Aboriginal heritage.

Any handover would include the proponent's facilitation of:

- a face-to-face/online meeting between the heritage consultants to discuss the project requirements, key issues, community commitments, and expectations
- ensure data and mapping in useable formats are provided by the incumbent heritage consultant.

Once undertaken, the change of heritage consultant should be advised to the Aboriginal parties outlined in Table 1.2.

### 4.4 Management of recovered cultural materials

All recovered cultural material will be curated:

- At the heritage consultant's office for archaeological analysis. The assemblage will be stored in a locked cabinet
- Once analysis has been completed, the assemblage will be re-buried/re-located within the project area in a location determined by the RAPs. A default location in an area where limited works are proposed is recommended in the northwestern corner of the project area (Figure 4.2) unless an alternate location is identified in by the RAPs during the project.

The methods of re-burial/re-location will be agreed with RAPs prior to implementation. As a default, it will align with Heritage NSW guidelines that dictate all cultural material will be buried in a sealed container (eg plastic box) and in their collected sample bags with relevant information (eg location recovered, date collected, etc). Once re-buried, the location would be recorded on Heritage NSW's AHIMS database.

### 4.5 Any proposed activity outside approved project area

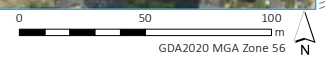
Any activity that may cause ground disturbance outside of the approved project area (Figure 1.1), or outside other existing approved areas under the development consent, will not occur without prior Aboriginal heritage assessment and other relevant legislative and internal approvals sought as required.

Depending on the scope, nature and approval pathway of the proposed ground disturbance, the following may apply:

- If the proposed activity requires additional environmental assessment, such as a modification to the existing development consent, an Aboriginal heritage assessment will be completed in accordance with relevant assessment requirements as specified by Heritage NSW/DPE
- If the proposed activity is permissible under the existing SSDA (ie an Aboriginal heritage impact permit (AHIP) not required), an Aboriginal heritage assessment must initially be completed to a level consistent with the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* (DECCW 2010b) guidelines. Any potential impacts to known or newly identified Aboriginal objects will be managed in accordance with the unexpected finds procedures set out in Section 4.4



Source: EMM (2023); DFSI (2022, 2021); MetroMap (2022)



**KEY**

- Area that this ACHMP applies
- Major road
- Proposed cultural material re-burial location

Proposed cultural assemblage re-burial location

Cumberland High School  
Aboriginal cultural heritage management plan  
Figure 4.2

## 5 Compliance, review and improvement

### 5.1 At a glance

- This section provides information to ensure the ACHMP is complied with during the project, and processes and procedures to manage complaints and non-conformances. A complaints register for use is provided in Appendix E.
- Criteria and timing for revisiting and updating the ACHMP is provided in this section. A document control and revision table are provided in Appendix F.

### 5.2 Compliance and auditing

#### 5.2.1 Measuring performance

Compliance with the ACHMP will be measured by standard environmental auditing procedures undertaken at regular intervals for the project. The audit will include an assessment of compliance with SSIA conditions and will include auditing the following measures:

- protection of all nominated sites
- inductions are taking place and include appropriate material
- reporting and managing any unexpected finds in accordance with this ACHMP.

The contractor may engage a heritage consultant to assist with reporting compliance as part of an Independent Environmental Audit.

Any incidents and non-compliance notifications will follow requirements set out in SSDA and as per the broader Environmental Management System (EMS).

#### 5.2.2 Complaints

Any complaints can be made to the key stakeholders identified in Table 1.2, and will be documented in a 'complaints register' included in Appendix E.

Any complaints will be used in improvements of the ACHMP as outlined in Section 5.3.

#### 5.2.3 Non-conformance

Any non-conformance will be subject to a detailed investigation by the proponent and heritage consultant in consultation with the RAPs. The investigation will include:

- a clear description of the non-conformance, and its actual/potential harm to cultural materials
- all personnel involved in the non-conformity, their organisation and contact details
- any corrective actions undertaken to address the non-conformity
- next steps, including the need for additional heritage activities and/or requirements to contact DPE/Heritage NSW to advise them of the non-conformity.

Any non-conformance will be used in improvement of the ACHMP as outlined in Section 5.2.

## 5.3 Review and improvement

### 5.3.1 Continual improvement

Continual improvement of this ACHMP will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement. The continual improvement process will be designed to:

- identify areas of opportunity for improvement of environmental management which leads to improved environmental performance
- determine the root cause or causes of non-conformances and deficiencies
- develop and implement a plan of corrective and preventative action to address non-conformances and deficiencies
- verify the effectiveness of the corrective and preventative actions
- document any changes in procedures resulting from process improvement.

### 5.3.2 ACHMP review and update

The ACHMP will be revisited and updated in accordance with condition A.32 of the project. Specifically, within three months of :

- a reportable incident
- a submission of an Independent Auditor
- approval of any modification to the project consent
- at direction from the Planning Secretary.

Any changes to the ACHMP will be included in the document control table provided in Appendix F. Aboriginal consultation for any updates and/or changes will be undertaken in accordance with Section 2.3.

## References

EMM, 2023, Carlingford West Public School and Cumberland High School – Aboriginal cultural heritage assessment. Unpublished report for School Infrastructure NSW.

# Abbreviations

Abbreviation	Full term
ACHA/ACHAR	Aboriginal cultural heritage assessment
AHIMS	Aboriginal Heritage Information Management System
AHIP	Aboriginal Heritage Impact Permit
ACHMP	Aboriginal cultural heritage management plan
CoA	Conditions of Approval
EA	Environmental Assessment
EMM	EMM Consulting Pty Limited
DEC/DECCW	A former NSW government body, now Heritage NSW
DPE	NSW Department of Planning and Environment
IPC	Independent Planning Commission
LALC	Local Aboriginal Land Council
LGA	Local government area
RAP	Registered Aboriginal Party (for the project)
RTS	Response to submissions
SSD	State Significant Development
SSI	State Significant Infrastructure
SSDA	State Significant Development approval, also called Project Approval
SSIA	State Significant Infrastructure approval, also called Project Approval





---

# Appendix A

## Aboriginal consultation

---

## A.1 Consultation log

A log of all consultation undertaken with the RAPs is provided in the next page.

**Table A.1 Consultation log**

<b>Date</b>	<b>Incoming/Outgoing</b>	<b>External Organisation</b>	<b>Contact made by (internal organisation)</b>	<b>Contact received from (external organisation)</b>	<b>Method</b>	<b>Details of communication</b>
15/11/23	Outgoing	All registered Aboriginal parties	EMM	-	Email	Distribution of ACHMP and request for review, input and comment within three weeks
15/11/23	Incoming	Didge Ngunawal Aboriginal Corporation	-	Paul Boyd/Lilly Carroll	Email	Acknowledged receipt and had no issues with the plan. Sought redaction of personal information on any public version of the document
19/11/23	Incoming	Yurrandaali CS	-	Bo Field	Email	Acknowledged receipt and supported the contents of the plan
20/11/23	Incoming	Gunjeewong Aboriginal Corporation	-	Shayne Dickson	Email	Acknowledged receipt and supported the contents of the plan
21/11/23	Incoming	GCS Group	-	Lee Field	Email	Acknowledged receipt and supported the contents of the plan
22/11/23	Incoming	Muragadi	-	Anthony Johnson	Email	Acknowledged receipt and supported the contents of the plan. Made specific reference to the need for field investigation and artefact collection and cultural inductions (both of which are proposed).
16/2024	Outgoing	All registered Aboriginal parties	EMM	-	Email	Distribution of ACHMP following revision and request for review, input and comment within three weeks









## A.2 Aboriginal feedback

The following section includes any feedback received during the finalisation and/or update of this ACHMP.



## Alan Williams

---

**From:** Alan Williams  
**Sent:** Wednesday, 15 November 2023 5:29 PM  
**To:** Alan Williams  
**Cc:** Georgia Burnett  
**Subject:** Cumberland Complex Schools - Aboriginal cultural heritage management plan - request for review and comment  
**Attachments:** E220118\_ACHMP\_v2.1.pdf

Dear All,

Thank you for your ongoing involvement in the proposed re-development of the Cumberland High School and Carlingford West Public School, Carlingford, NSW. As you may recall, an Aboriginal cultural heritage assessment (ACHA) was developed for the site in late 2022/early 2023. Since that time, the Environmental Impact Statement (EIS) has been submitted to the Department of Planning and Environment (DPE) for assessment. The project is expected to be approved shortly and we have received a version of the conditions that will be sought. In terms of Aboriginal heritage, these include the need to develop an Aboriginal cultural heritage management plan (ACHMP) to provide direction for Aboriginal heritage activities prior to and during the construction.

Please find attached a draft version of the ACHMP for your review and comment. As outlined in the ACHMP, we request that any comments are received by **6 December 2023**.

[REDACTED]

Happy to discuss,

Thanks  
Al

**Dr Alan Williams** FSA FRSA FRSN MAACAI MAIATSIS MEIANZ  
Technical Lead, Aboriginal Heritage | Associate Director



**T** 02 9493 9500  
**M** 0438 104 740  
**LI** [Connect on LinkedIn](#)  
[emmconsulting.com.au](http://emmconsulting.com.au)

**From:** [Shayne Dickson](#)  
**To:** [Alan Williams](#)  
**Subject:** RE: Cumberland Complex Schools - Aboriginal cultural heritage management plan - request for review and comment  
**Date:** Monday, 20 November 2023 4:04:22 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[NYW0117306843009\\_15661\\_9\\_61.docx](#)

**CAUTION: This email originated outside of the Organisation.**

Good afternoon Alan

Ginjewong is happy with the Aboriginal Cultural Heritage management plan for Cumberland Complex Schools and is happy to continue to support the cultural aspect of this project when needed.

Kind Regards  
Shayne Dickson

Sent from [Mail](#) for Windows

**From:** [Alan Williams](#)  
**Sent:** Wednesday, 15 November 2023 5:31 PM  
**To:** [Alan Williams](#)  
**Cc:** [Georgia Burnett](#)  
**Subject:** Cumberland Complex Schools - Aboriginal cultural heritage management plan - request for review and comment

Dear All

Thank you for your ongoing involvement in the proposed re-development of the Cumberland High School and Carlingford West Public School, Carlingford NSW. As you may recall, an Aboriginal cultural heritage assessment (ACHA) was developed for the site in late 2022/early 2023. Since that time, the Environmental Impact Statement (EIS) has been submitted to the Department of Planning and Environment (DPE) for assessment. The project is expected to be approved shortly and we have received a version of the conditions that will be sought. In terms of Aboriginal heritage, these include the need to develop an Aboriginal cultural heritage management plan (ACHMP) to provide direction for Aboriginal heritage activities prior to and during the construction.

Please find attached a draft version of the ACHMP for your review and comment. As outlined in the ACHMP, we request that any comments are received by **6 December 2023**.

Happy to discuss

Thanks  
Al

**Dr Alan Williams** FSA FRSA FRSN MAACAI MAIATSSS MEIANZ  
Technical Lead, Aboriginal Heritage | Associate Director

T 02 9493 9500  
M 0438 104 740  
E [alan@emmc.com.au](mailto:alan@emmc.com.au)  
[emmcconsulting.com.au](http://emmcconsulting.com.au)

SYDNEY | Kameraiyal Country | Ground floor, 20 Chandos Street, St Leonards NSW 2065



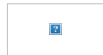
**Associate Investigator**  
ARC Centre of Excellence for Australian Biodiversity and Heritage (CABAH)  
University of New South Wales  
Sydney, NSW 2052



**Adjunct Senior Lecturer**  
School of Biological, Earth and Environmental Sciences  
University of New South Wales,  
Sydney, NSW 2052



**Industry Fellow**  
Institute of Sustainable Futures  
University Technology Sydney  
Ultimo, NSW 2007



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**From:** [jesse johnson](#)  
**To:** [Alan Williams](#)  
**Subject:** Re: Cumberland Complex Schools - Aboriginal cultural heritage management plan - request for review and comment  
**Date:** Wednesday, 22 November 2023 9:53:34 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.jpg](#)  
[image006.png](#)

**CAUTION: This email originated outside of the Organisation.**

Hi Alan,  
I have read the project information and ACHMP for the above project, and we agree that a survey should be organised to save any artifacts from damage that may be visible. We also agree that inductions should be carried out by all employees attending the site for the construction work. If you require further details please contact me via email or mobile.

Kind regards  
Anthony

On Wednesday, 15 November 2023 at 05:29:31 pm AEDT, Alan Williams <[awilliams@emmconsulting.com.au](mailto:awilliams@emmconsulting.com.au)> wrote:

Dear All

Thank you for your ongoing involvement in the proposed re-development of the Cumberland High School and Carlingford West Public School Carlingford NSW. As you may recall an Aboriginal cultural heritage assessment (ACHA) was developed for the site in late 2022/early 2023. Since that time the Environmental Impact Statement (EIS) has been submitted to the Department of Planning and Environment (DPE) for assessment. The project is expected to be approved shortly and we have received a version of the conditions that will be sought. In terms of Aboriginal heritage these include the need to develop an Aboriginal cultural heritage management plan (ACHMP) to provide direction for Aboriginal heritage activities prior to and during the construction.

Please find attached a draft version of the ACHMP for your review and comment. As outlined in the ACHMP we request that any comments are received by **6 December 2023**.

[Redacted]

Happy to discuss

Thanks  
Al

**Dr Alan Williams** FSA FRSA FRSN MAACAI MAIATSIS MEIANZ  
Technical Lead, Aboriginal Heritage | Associate Director

02 9493 9500  
M 0438 104 740  
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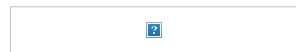
SYDNEY | Kamearagal Country | Ground floor, 20 Chandos Street, St Leonards NSW 2065



Associate Investigator  
ARC Centre of Excellence for Australian Biodiversity  
and Heritage (CABAH)  
University of New South Wales  
Sydney, NSW 2052

Adjunct Senior Lecturer  
School of Biological, Earth and Environmental Sciences  
University of New South Wales,  
Sydney, NSW 2052

Industry Fellow  
Institute of Sustainable Futures  
University Technology Sydney  
Ultimo, NSW 2007



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**From:** BCS GROUP  
**To:** Alan Williams  
**Subject:** Re: Cumberland Complex Schools - Aboriginal cultural heritage management plan - request for review and comment  
**Date:** Tuesday, 21 November 2023 5:40:35 PM  
**Attachments:** image003.png  
image004.png  
image005.png  
image006.png  
image007.png  
image008.png  
Invoice\_INV-0019.pdf

CAUTION: This email originated outside of the Organisation.

Dear Alan,

I hope this message finds you well. I would like to express my appreciation for the thorough work undertaken in developing the ACHMP. It is evident that considerable effort has gone into preserving and promoting our cultural heritage. On behalf of Yurrandaali we thank you and we support the ACHMP.

Please see attached invoice.

Thanks  
Lee Field

On Wednesday, November 15, 2023, Alan Williams <[awilliams@emmconsulting.com.au](mailto:awilliams@emmconsulting.com.au)> wrote:

Dear All,

Thank you for your ongoing involvement in the proposed re-development of the Cumberland High School and Carlingford West Public School, Carlingford, NSW. As you may recall, an Aboriginal cultural heritage assessment (ACHA) was developed for the site in late 2022/early 2023. Since that time, the Environmental Impact Statement (EIS) has been submitted to the Department of Planning and Environment (DPE) for assessment. The project is expected to be approved shortly and we have received a version of the conditions that will be sought. In terms of Aboriginal heritage, these include the need to develop an Aboriginal cultural heritage management plan (ACHMP) to provide direction for Aboriginal heritage activities prior to and during the construction.

Please find attached a draft version of the ACHMP for your review and comment. As outlined in the ACHMP, we request that any comments are received by **6 December 2023**.

[Redacted]

Happy to discuss,

Thanks

Al

**Dr Alan Williams** FSA FRSA FRSN MAACA MALATSIS MEIANZ

Technical Lead, Aboriginal Heritage | Associate Director

T 02 9493 9500



M 0438 104 740

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[emmconsulting.com.au](http://emmconsulting.com.au)

SYDNEY | Kameraigal Country | Ground floor, 20 Chandos Street, St Leonards NSW 2065



Associate Investigator

ARC Centre of Excellence for Australian Biodiversity and Heritage (CABAH)

University of New South Wales

Sydney, NSW 2052

Adjunct Senior Lecturer

School of Biological, Earth and Environmental Sciences

University of New South Wales,

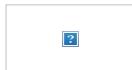
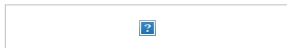
Sydney, NSW 2052

Industry Fellow

Institute of Sustainable Futures

University Technology Sydney

Ultimo, NSW 2007



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--  
Regards,  
Lee

**Lee Field (she/her)**  
Aboriginal Cultural Heritage Officer - Sydney region  
Manager and Director

**From:** [Bo Field](#)  
**To:** [Alan Williams](#)  
**Subject:** Re: Cumberland Complex Schools - Aboriginal cultural heritage management plan - request for review and comment  
**Date:** Sunday, 19 November 2023 8:12:39 PM  
**Attachments:** [image001.png](#)  
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[image003.png](#)  
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[image005.jpg](#)  
[image006.png](#)  
[10029\\_Yurrandaali.pdf](#)

CAUTION: This email originated outside of the Organisation.

Dear Alan,

I hope this message finds you well. I would like to express my appreciation for the thorough work undertaken in developing the ACHMP. It is evident that considerable effort has gone into preserving and promoting our cultural heritage. On behalf of Yurrandaali we thank you and we support the ACHMP.

Please see attached invoice.

Kind Regards,

Bo Field - Manager  
Yurrandaali CS  
[Redacted]

---

**From:** Alan Williams <[awilliams@emmconsulting.com.au](mailto:awilliams@emmconsulting.com.au)>  
**Sent:** Wednesday 15 November 2023 5:29 PM  
**To:** Alan Williams <[awilliams@emmconsulting.com.au](mailto:awilliams@emmconsulting.com.au)>  
**Cc:** Georgia Burnett <[gburnett@emmconsulting.com.au](mailto:gburnett@emmconsulting.com.au)>  
**Subject:** Cumberland Complex Schools - Aboriginal cultural heritage management plan - request for review and comment

Dear All

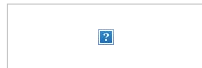
Thank you for your ongoing involvement in the proposed re-development of the Cumberland High School and Carlingford West Public School, Carlingford, NSW. As you may recall, an Aboriginal cultural heritage assessment (ACHA) was developed for the site in late 2022/early 2023. Since that time, the Environmental Impact Statement (EIS) has been submitted to the Department of Planning and Environment (DPE) for assessment. The project is expected to be approved shortly and we have received a version of the conditions that will be sought. In terms of Aboriginal heritage, these include the need to develop an Aboriginal cultural heritage management plan (ACHMP) to provide direction for Aboriginal heritage activities prior to and during the construction.

Please find attached a draft version of the ACHMP for your review and comment. As outlined in the ACHMP, we request that any comments are received by **6 December 2023**.

[Redacted]  
Happy to discuss

Thanks  
Al

**Dr Alan Williams** FSA FRSA FRSN MAACA MAIATSIS MEIANZ  
Technical Lead, Aboriginal Heritage | Associate Director



02 9493 9500  
M 0438 104 740  
LI [Connect on LinkedIn](#)  
[emmconsulting.com.au](http://emmconsulting.com.au)

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ARC Centre of Excellence for Australian Biodiversity  
and Heritage (CABAH)  
University of New South Wales  
Sydney, NSW 2052

Adjunct Senior Lecturer  
School of Biological, Earth and Environmental Sciences  
University of New South Wales,  
Sydney, NSW 2052

Industry Fellow  
Institute of Sustainable Futures  
University Technology Sydney  
Ultimo, NSW 2007



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# Appendix B

## Legislation and obligations

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## B.1 Obligation to protect Aboriginal cultural heritage

### B.1.1 National Parks and Wildlife Act 1974

The National Parks and Wildlife Act 1974 (NPW Act) provides protection for Aboriginal objects and places across NSW:

- 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: *any place declared to be an Aboriginal place under section 84.* This is a very specific piece of legislation that provides process and management of Aboriginal sites of cultural, but not necessarily scientific, values. They are commonly, but not always associated with intangible values.
- any place declared to be an Aboriginal place by the Minister for the Environment, under Section 84 of the Act.

### B.1.2 Obligation to avoid harm

All employees, contractors, sub-contractors and visitors to the project have an obligation to avoid harming Aboriginal heritage unless engaged in an Aboriginal heritage management activity described in this plan.

The National Parks and Wildlife Act 1974 defines “harm” to an object or place as any act or omission that:

- a) destroys, defaces or damages the object or place; or
- b) in relation to an object-moves the object from the land on which it had been situated; or
- c) is specified by the regulations; or
- d) causes or permits the object or place to be harmed in a manner referred to in paragraph (a), (b) or (c), but does not include any act or omission that:
- e) desecrates the object or place; or
- f) is trivial or negligible; or
- g) is excluded from this definition by the regulations.

### B.1.3 Obligation to protect and implement management measures

Site personnel, contractors and subcontractors responsible for land management or construction have an obligation to protect Aboriginal heritage within their area or work responsibility. This extends to both cultural materials identified as part of earlier phases of the project, and any additional cultural materials identified during the construction. Protection means active recognition of known Aboriginal heritage and active measure to avoid and/or suitably mitigate Aboriginal heritage.

This may include fencing, erosion control and modification of work plans to avoid impacts to Aboriginal heritage, as well as facilitating a process where work personnel are aware of the nearby heritage.

Site personnel, contractors and subcontractors also have the responsibility to ensure that appropriate management measures have been employed prior to, or in association with, their activities which impact Aboriginal sites.



#### B.1.4 Statutory reporting requirements

Notifications to Heritage NSW are required in relation to discovery, impact and care of Aboriginal objects under the NPW Act. This will be the responsibility of the project manager, environmental representative and/or equivalent.

#### B.1.5 Discovery of Aboriginal objects

Under Section 89A of the NPW Act, it is a requirement that Heritage NSW is notified of the existence of Aboriginal objects as soon as practicable after they are first identified. This is done through the completion of the Heritage NSW Aboriginal Site Card which is submitted to the Registrar of AHIMS for inclusion on the Aboriginal site database. Information regarding AHIMS and site recording forms can be downloaded from Heritage NSW's website:

<http://www.environment.nsw.gov.au/licences/DECCAHIMSSiteRecordingForm.htm>.

#### B.1.6 Care agreements

Under s85A of the NPW Act, Aboriginal objects remain the property, and under the protection of, the Crown until formal transfer to a person or persons of a class prescribed by the regulations occurs. A Care Agreement is not currently proposed under this plan; however, may be pursued in the future if Aboriginal objects are identified to a level of significance that the RAPs wish to retain such objects.

Care Agreement application forms can be downloaded at:

<https://www.environment.nsw.gov.au/topics/aboriginal-cultural-heritage/protect-and-manage/care-agreements>.

#### B.1.7 Reporting impact to Aboriginal sites

An Aboriginal Site Impact Recording Form must be completed following impacts to AHIMS sites that are:

- a result of test excavation carried out in accordance with the Code of Practice for the Archaeological Investigation of Aboriginal Objects in NSW;
- authorised by an Aboriginal Heritage Impact Permit (AHIP) issued by Heritage NSW;
- undertaken for the purpose of complying with Secretary's environmental assessment requirements issued by DPE for:
  - state significant development (SSD);
  - state significant infrastructure (SSI); or
  - a major project; or
  - authorised by an SSD/SSI approval under the EP&A Act.

Completed forms must be submitted to the AHIMS Registrar at [ahims@environment.nsw.gov.au](mailto:ahims@environment.nsw.gov.au).

Aboriginal Site Impact Recording Forms can be downloaded at:

<https://www.environment.nsw.gov.au/resources/cultureheritage/aboriginal-site-impact-recording-form-120558.pdf>



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# Appendix C

## Aboriginal site descriptions

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## C.1 Site definitions

A description of terms used to describe different site features known to occur in the vicinity of the project area is provided in Table C.1 and use definitions provided by Heritage NSW.

**Table C.1 Site definitions and recording**

Site feature	Definition and recording methods
Aboriginal ceremony and Dreaming	Previously referred to as mythological sites these are spiritual/story places where no physical evidence of previous use of the place may occur; eg natural unmodified landscape features, ceremonial or spiritual areas, men's/women's sites, dreaming (creation) tracks, marriage places etc.
Artefact site (open stone artefact site)	Objects such as stone tools, and associated flaked material, spears, manuports, grindstones, discarded stone flakes, modified glass or shell demonstrating evidence of use of the area by Aboriginal people.
Burials	A traditional or contemporary (post-contact) burial of an Aboriginal person, which may occur outside designated cemeteries and may not be marked; eg in caves, marked by stone cairns, in sand areas, along creek banks etc.
Fish trap	A modified area on watercourses where fish were trapped for short-term storage and gathering.
Grinding grooves	Grinding grooves are defined as an area of outcropping bedrock containing evidence of one or more grinding grooves where ground-stone hatchets or other grinding practices (ie seed grinding) were implemented.
Habitation structure	Structures constructed by Aboriginal people for short- or long-term shelter. More temporary structures are commonly preserved away from the NSW coastline, may include historic camps of contemporary significance. Smaller structures may make use of natural materials such as branches, logs and bark sheets or manufactured materials such as corrugated iron to form shelters. Archaeological remains of a former structure such as chimney/fireplace, raised earth building platform, excavated pits, rubble mounds etc.
Modified tree (carved or scarred)	Trees which show the marks of modification as a result of cutting of bark from the trunk for use in the production of shields, canoes, boomerangs, burials shrouds, for medicinal purposes, foot holds etc., or alternately intentional carving of the heartwood of the tree to form a permanent marker to indicate ceremonial use/significance of a nearby area, again these carvings may also act as territorial or burial markers.
Potential archaeological deposit (PAD)	An area where Aboriginal objects may occur below the ground surface. The term 'potential archaeological deposit' was first applied in Sydney regional archaeology in the 1980s and referred to rockshelters that were large enough and contained enough accumulated deposit to allow archaeologists to predict that subsurface cultural material was likely to be present. Since then, the term has come to include open sites where the same prediction can be made. Unless previously identified, it is considered unlikely that a PAD would be classified through an unexpected finds process.
Shell	An accumulation or deposit of shellfish from beach, estuarine, lacustrine or riverine species resulting from Aboriginal gathering or consumption. Usually found in deposits previously referred to as shell middens. Must be found in association with other objects like stone tools, fish bones, charcoal, fireplaces/hearths, and burials. Will vary greatly in size and composition.

**Table C.1**      **Site definitions and recording**

<b>Site feature</b>	<b>Definition and recording methods</b>
Stone quarry	<p>Usually, a source of good quality stone which is quarried and used for the production of stone tools.</p> <p>Stone quarries represent where Aboriginal people gathered raw stone materials for stone tools and/or manufactured stone tools from the adjacent source material. Quarry sites are found at rock outcrops where the material was of suitable quality to have been used to manufacture stone tools. Stone quarries were defined by the presence of outcropping stone material with nearby evidence of the same material type used in the stone tool manufacture process. This was most commonly indicated by large stone cores or stone flakes distributed amongst the same naturally outcropping material.</p>



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# Appendix D

## Archaeological excavation methods

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## D.1 Excavation methods

The following section outlines a standard excavation methodology that can be adopted in the case of unexpected finds procedures (Section 4.4). This approach will be used a default, with alternate methods considered by the heritage professional in consultation with the RAPs on a case-by-case basis.

The specific methods below propose a two stage approach, reflecting initially an investigative phase followed by subsequent conservation ex situ or archaeological salvage where certain thresholds are met.

### D.1.1 Generic research questions

- What is the spatial and stratigraphic patterns of cultural materials within the investigation area? Can inter and/or intra-site past Aboriginal activities be determined through excavation in these areas?
- What is the age, composition, technological attributes, and significance of cultural materials within the areas of the proposed activity?
- What are the environmental characteristics associated with the distribution of Aboriginal cultural heritage within the area? Can the formative processes of the stratigraphic profile provide information on the nature and/or survivability of the archaeological resources? Are there other key factors in the distribution and extent of the material culture within the area?
- What are the cultural, social and public values associated with the cultural materials in the area? Does the excavations support or require modification of the significance and values previously assigned to Aboriginal sites, places and/or locales within the project area?
- How will the cultural materials be conserved and managed in future?

### D.1.2 Investigative phase

The following methods will be adopted to investigate the cultural materials.

- Excavation
  - A grid of 1 m<sup>2</sup> test pits would be established at suitable spacing (<20 m) to inform the identified cultural materials using a hand-held Leica RTK CS10/GS08 survey grade Differential GPS device (or equivalent).
  - All test pits would be dug manually using shovels, mattocks, trowels and other hand tools as required. Excavation would be undertaken as 1 m<sup>2</sup> units. Each square would be given an alpha-numeric label for identification purposes.
  - All excavation would be undertaken in 10 cm spits to culturally sterile depths or 1.5 m below current surface (the deepest depth that can be reached without shoring systems and/or benching).
  - All sediment would be placed in buckets, labelled according to its assigned test pit number and spit, and recorded and documented. All sediment would then be wet-sieved through a 5 mm wire aperture mesh, and any historic and/or Aboriginal cultural material recovered, labelled and bagged for subsequent analysis and curation.

- Field Documentation
  - All test pits would be documented using photographic records, written descriptions and scaled drawings.
  - Soil profiles would be recorded in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010), including scaled drawings, photographs, and written descriptions.
  - Soil samples may be collected for description, sedimentological and chronological analysis where such analysis is considered likely to contribute significant information. Optically Stimulated Luminescence (OSL) samples would be taken in areas where Aboriginal objects are found, and generally try to bracket the deposit (to provide a maximum and minimum age). Material for radiocarbon analysis may also be undertaken opportunistically if archaeological features containing charcoal or other dateable material are evident.
  - Reduced levels of the top and bottom of the test pit would be documented using a dumpy level against a known elevation. Other levels may be taken as required.
- Excavation procedures and protocols may be modified at the discretion of the Excavation Director, in consultation with the RAPs and proponent as the conditions in the field and nature of the excavations develop. This includes the movement/discontinuance of test pits to avoid existing obstacles, buried services and disturbances.

At the completion of the Phase 1 test pits, consideration of the Phase 2 thresholds (Section D1.3) will be considered as to whether further excavations are required.

### D.1.3 Thresholds for further excavation

The initiation of Phase 2 – salvage excavation – would *only* be undertaken in areas where the thresholds outlined below are met. The location of salvage excavations would be determined at the completion of the Phase 1 and at those locations where the greatest potential for answering the research questions (Section D1.1) is identified.

The thresholds for expansion would include:

- Stone artefact densities greater than 20/m<sup>2</sup> and therefore indicative of past occupation based on our broader understanding of the region.
- Where evidence of multiple phases of past activity is identified through changing raw material types and/or distinct technological attributes at different depths within the soil profile.
- Where dense concentrations of cultural materials are discovered at significant depths that may indicate extreme age.
- Where rare or unique stone artefacts and/or other archaeological material is recovered.
- Where unique and/or rare archaeological features (eg hearths, cooking pits, etc) are identified.
- Other conditions that are considered by the Excavation Director to inform the research questions and/or broader aims of the project.

#### D.1.4 Salvage excavations

Where suitable thresholds (Section D1.3) are met, additional archaeological excavations would be undertaken in these identified locations. These excavations are proposed to consist of contiguous open area salvage excavation using higher resolution recovery techniques. The number and size of these open area excavations would be dictated by the size of the identified cultural material, with smaller values of 25 m<sup>2</sup> (5 x 5 m) and up to 100 m<sup>2</sup> (10 x 10 m) being common sizes for such work.

The following methods would be adopted for all salvage excavations:

- Excavation:
  - Establishment of open area excavation area/s using a using a hand-held Leica RTK CS10/GS08 survey grade Differential GPS device (or equivalent).
  - All test pits would be dug manually using shovels, mattocks, trowels and other hand tools as required. Excavation would be undertaken as 1 m<sup>2</sup>. Each square would be given an alpha-numeric label for identification purposes.
  - All excavation would be undertaken in 5 cm spits to the depth of 70 cm below surface, which has been shown as culturally sterile (EMM 2021). Depths of excavation would be adjusted as necessary based on the findings of the investigative phase.
  - All sediment would be placed in buckets, labelled according to its assigned test pit number and spit, and recorded and documented. All sediment would then be wet-sieved through a 5 mm wire aperture mesh, and any historic and/or Aboriginal cultural material recovered, labelled and bagged for subsequent analysis and curation.
- Field Documentation:
  - All excavations would be documented using photographic records, written descriptions and scaled drawings.
  - Soil profiles would be recorded in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010), including scaled drawings, photographs, and written descriptions.
  - Soil samples would be collected for description, sedimentological and chronological analysis where such analysis is considered likely to contribute significant information. Optically Stimulated Luminescence (OSL) samples would be taken in areas where Aboriginal objects are found, and generally try to bracket the deposit (to provide a maximum and minimum age). Material for radiocarbon analysis may also be undertaken opportunistically if archaeological features containing charcoal or other dateable material are evident.
  - Reduced levels of the top and bottom of the test pit, and at the top of each fourth spit would be documented using a dumpy level against a known elevation. Other levels may be taken as required.
- Excavation procedures and protocols may be modified at the discretion of the Excavation Director, in consultation with the RAPs and proponent as the conditions in the field and nature of the excavations develop. This includes the movement/discontinuance of test pits to avoid existing obstacles, buried services and disturbances.

### D.1.5 Post excavation analysis and reporting

The post-excavation analysis (incorporating data from the excavations) would be designed to address the research objectives and aims, along with other relevant questions that may arise based on the results of the excavation. These would include, but not be necessarily limited to:

- Stone artefact analysis, including descriptive and functional recording of the assemblage, as well as interpretation of past activities, post-depositional change and comparison with other nearby data. Conjoining may also be attempted where sufficient cultural materials have been recovered. Geochemical analysis of stone artefacts for provenance and other material source research questions using X-Ray Fluorescence, Inductively Coupled Plasma Mass Spectrometry and/or Thermal Ionisation Mass Spectrometry may also be undertaken. These samples would be processed either at Australia's Nuclear Science and Technology Organisation (ANTSO), University of Wollongong and/or University of New South Wales.
- Geochronology, including the processing and analysis of samples to inform the absolute age of the soil profile and/or cultural assemblage recovered. This would include Optically Stimulated Luminescence ages, as well as radiocarbon samples were recovered. While large number of these samples are likely to be collected, given the prohibitive cost of processing, it is probable that a small number of ages would be obtained in a small number of master-sequences to inform the broader archaeological program. The samples would be processed by either University of Gloucestershire and/or University of Wollongong.
- Geochemistry and soil analysis that would be used to further inform and interpret the formation history of the soil profile from which cultural materials are recovered. This would include the use of Itrax X-ray Fluorescence (XRF) core scanning methods at Australia's Nuclear Science and Technology Organisation (ANTSO), as well as particle size analysis to explore changes in the alluvial and colluvial history of the river corridor.
- Palaeo-environmental analysis, including palynology, phytolith analysis and/or charcoal analysis to explore the past vegetation and fire regimes that may have influenced and/or modified by past human activity. These would utilise the same samples collected for geochemistry and/or sampling and sent to a range of University specialists in these fields to process and interpret the results.
- Reporting that would provide information on the field investigations, compilation and synthesis of the post-excavation analyses, and interpretation of the results to inform the past activity and use of the region.



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# Appendix E

## Complaints register

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**Table E.1**      **Complaints register**

Date	Contact made by (internal)	Contact received from (external)	Method	Details of communication
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# Appendix F

## Document control

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**Table F.1 Document revisions**

Revision #	Date	Prepared by	Approved by	Consultation in accordance with Table 2.1? (Yes/No)	Description of changes	Page # of change

## **Australia**

### **SYDNEY**

Ground floor, 20 Chandos Street  
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### **NEWCASTLE**

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