



Aboriginal cultural heritage management plan

Kingscliff Public School

Prepared for Schools Infrastructure NSW
October 2023





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Aboriginal cultural heritage management plan

Kingscliff Public School

Report Number

H200188 RP5

Client

Schools Infrastructure NSW

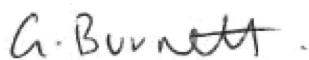
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22 September 2023

Approved by



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22 September 2023

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This document at a glance

ES1.1 Purpose of document

Schools Infrastructure NSW is undertaking the re-development of the Kingscliff Public School, 12 Orient Street, Kingscliff, NSW. 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.

ES1.2 Summary of Aboriginal heritage

Previous assessment identified three Aboriginal sites and/or deposits within the project area. One of these was a single stone artefact already considered to be destroyed prior to the completion of the ACHA. The others consist of a very low density of stone artefacts in the upper soil profile (primarily <80 cm) across the northern portion of the project area, and a narrow strip of reddish coloured soil east of the canteen identified as having cultural values. Recent investigations as a result of the ACHMP have suggested additional cultural materials may be encountered as deep as 130 cm below current surface.

The proposed development would have adverse impacts to all of the identified Aboriginal sites and deposits, although portions of them would be unaffected by the works. As such a range of additional archaeological actions were discussed and have been integrated into the ACHMP (see below).

ES1.3 Project specific Aboriginal heritage requirements

Three project specific mitigation measures are required **during the construction phase**. These include:

- additional archaeological excavations across the northern of the project area to be implemented following removal of demountables and extant buildings, as presented in Figure 4.2 and methods outlined in Section 4.2.1 and Appendix D
- additional archaeological excavation focussing on deposits between 80-150 cm below surface in test pits #33 and #35 as presented in Figure 4.3 and methods outlined in Section 4.2.1 and Appendix D where development impacts cannot be avoided
- cultural monitoring by RAPs of all construction activities deeper than 1.5 m below current surface, and in accordance with methods outlined in Section 4.2.2.

General Aboriginal heritage requirements

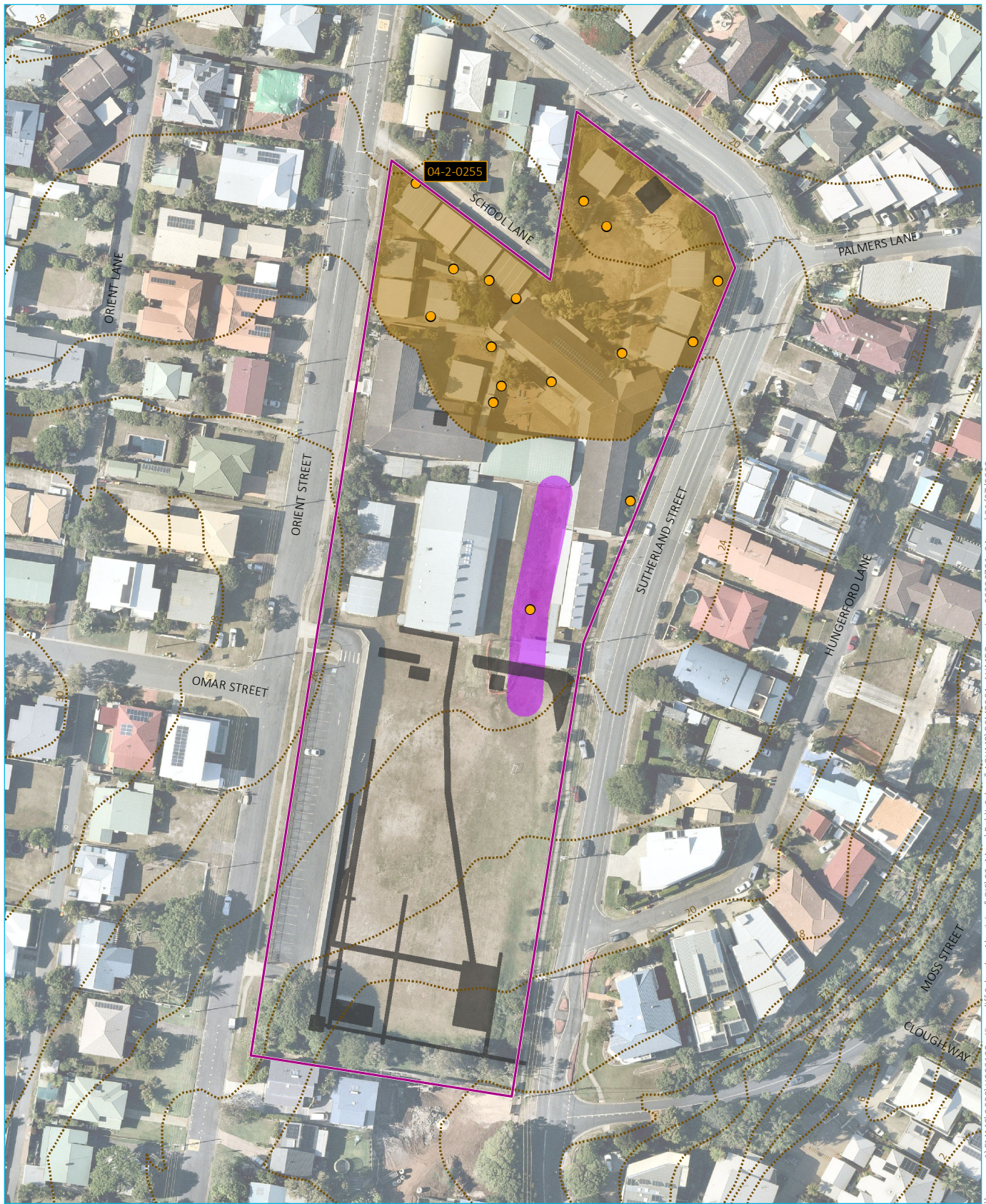
The ACHMP outlines a number of general requirements during the construction phase (Section 4):

- 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)
- protocols for undertaking activities in area areas that have not been previously assessed (Section 4.5).

ES1.4 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)
- 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); Nearmap (2020); DFSI (2017); Accor (2021)

- KEY**
- Where ACHMP applies, including cultural inductions, unexpected finds and additional assessment where necessary
 - Where impacts >1.5m are proposed, cultural monitoring required
 - Additional archaeological excavation required
 - Red Cudgen soils
 - Cultural material location
 - Topographic contour (2 m)

Summary of Aboriginal heritage management requirements

Indigeco
Aboriginal cultural heritage management plan
Figure ES1



\\emmsvr1\EMM\3\2020\1200188 - Kingscliff Schools - Aboriginal\GIS\02_Maps\PublicSchool\ACHMP\PSM\004_AHMP\Overview_2023\0731_04.mxd 31/07/2023

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1 Introduction

1.1 Purpose of document

Schools Infrastructure NSW is undertaking the re-development of the Kingscliff Public School, Orient Street, Kingscliff, NSW (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 Indigeo Pty Ltd, with specialist assistance from EMM Consulting Pty Ltd (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 2021). 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 in the State Significant Development Approval (SSDA) (Section 1.1.1).

This document has been developed to address these 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 4.3.2)
- 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.

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*. DPIE has provided the following identifier for the approval: **SSD 8378620**.

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 2021).

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

Requirement	Section addressed
Aboriginal Heritage Management Plan	
B24. Prior to the commencement of construction, the Applicant must prepare an Aboriginal Heritage Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:	
(a) be prepared by suitably qualified and experienced persons;	The plan was developed by Dr Alan Williams FSA, FRSA, FRSN, MAACAI, MEIANZ, Technical Lead, Aboriginal heritage
(b) be prepared in consultation with Registered Aboriginal Parties;	Section 2.3 and Appendix A
(c) include a methodology for an archaeological excavation program of the site with consideration to understanding site characteristics and local and regional prehistory;	Section 4.2 and Appendix D
(d) include a description of the measures that would be implemented for:	-
(i) protecting the Aboriginal heritage items identified within the project footprint or items located outside the approved development footprint, including fencing off the Aboriginal heritage items prior to commencing construction;	Sections 4.3 and 4.5
(ii) salvaging and relocating the Aboriginal heritage items located within the approved development footprint;	Section 4.2
(iii) salvaging, relocating or avoiding any Aboriginal heritage items located within the approved development footprint identified during test excavations of the site;	Section 4.2
(iv) include updated baseline mapping of the heritage items within and adjoining to the development disturbance area;	Figures 3.1 and 3.2
(v) include updated mapping of all areas that have been and will be subject to monitoring, test excavations, and salvage excavations;	Figure 4.1
(vi) include conservation options for the mitigation and avoidance to impacts on Aboriginal Heritage Information Management Systems registered sites situated within and outside the project footprint;	N/A – all identified sites are within the impact footprint. No other sites are within the curtilage of this plan
(vii) prepare a methodology outlining when Registered Aboriginal Parties must be notified of changes to the Aboriginal Heritage Management Plan;	Sections 2.3 and 5.3
(viii) include a procedure for assessing significance of Aboriginal Objects identified during the monitoring, test excavations, and salvage excavation and ensure that the management and mitigation measures are considered for all sites, and with special consideration for those of high significance; and	Section 4.4 and Appendix D
(ix) a strategy for the long term management of any Aboriginal heritage items or material collected during the test excavation or salvage works.	Section 4.4
Aboriginal heritage	
C25. All reasonable steps must be taken so as not to harm, modify or otherwise impact Aboriginal objects except as authorised by this approval.	Section 4.
C26. Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by EMM Consulting dated May 2021.	This plan forms part of the recommendations from the EMM 2021 report; and all other recommendations are incorporated into the requirements of this document

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

Requirement	Section addressed
Unexpected finds protocol – Aboriginal heritage	
<p>C27. In the event that surface disturbance identifies a new Aboriginal object:</p> <ul style="list-style-type: none"> (a) all works must halt in the immediate area to prevent any further impacts to the object(s); (b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the object(s); (c) the site must 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; (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 (e) works may only recommence with the written approval of the Planning Secretary. 	Section 4.3.2
<p>D25. The Applicant must prepare Aboriginal Cultural Heritage Excavation Report(s), of the salvage excavation undertaken in accordance with condition B24. The Registered Aboriginal Parties must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. A final report must be provided within 24 months of completion of the salvage work or within another timeframe agreed with the Planning Secretary. Copies of the report must also be provided to the relevant Local Aboriginal Land Council and the Registered Aboriginal Parties, Heritage NSW and Council. The Aboriginal Cultural Heritage Excavation Report(s), must:</p> <ul style="list-style-type: none"> (a) be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, OEH 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010; and (b) document the results of all archaeological excavations (with artefact analysis and identification of a final repository for finds). 	Section 4.4 and Appendix D

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
Project team				
Greg Hall*	SINSW	Project Director	0476 870 375	Greg.Hall13@det.nsw.edu.au
Ali Byrne	SINSW	Heritage specialist	0476 895 773	Alexandra.Byrne10@det.nsw.edu.au
Martyn Charlett	SINSW	Senior Project Director	0412 135 517	Martyn.Charlett@det.nsw.edu.au
Laura Goodall*	MBB Group	Project Manager	0433 088 038	Laura.Goodall@mbbgroup.com.au
Pat Wills*	Richard Crookes	Principal Contractor	0452 277 717	willsp@richardcrookes.com.au
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
Tuongvi Doan	DPE	Planning regulator	-	tuongvi.doan@planning.nsw.gov.au
Registered Aboriginal parties				
Maurice Gannon	Tweed Byron Local Aboriginal Land Council	Aboriginal representative	0407 643 349	sites@tblalc.com
Warren Phillips	Tweed Byron Local Aboriginal Land Council	Aboriginal representative	0411 940 000	culturalheritage@tblalc.com
Jackie McDonald	-	Aboriginal representative	0408 369 629	mctogo2@gmail.com
Jason McDonald	-	Aboriginal representative	0458 485 754	hesion@live.com.au
Ash Moran	-	Aboriginal representative	02 6627 0205	ashley.moran@environment.nsw.gov.au
Paul Buxton	-	Aboriginal representative	07 5536 1763	paul.j.buxton@gmail.com
Marcus Ferguson	-	Aboriginal representative	0428 114 212	mferguson310574@gmail.com

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



Source: EMM (2021); DFSI (2017); GA (2011); Nearmap (2020)

- KEY**
- Where ACHMP applies
- INSET KEY**
- Main road
 - Local Road
 - NPWS reserve

Areas to which this ACHMP applies

Indigeco
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 additional archaeological excavations needed during the construction; cultural monitoring of any activities >1.5 m; 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 SSDA

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 six individuals and/or organisations (Table 1.2).

Identified as registered Aboriginal parties (RAPs), these six individuals and/or organisation were provided opportunities to review Aboriginal heritage documentation, including the ACHA, and participating in the on-site activities.

Many of the RAPs have close relationships with SINSW outside of this project, including other school developments and more general Aboriginal engagement, acknowledgement and interpretation across the Far North Coast. This has included various discussions around this ACHMP and its contents.

2.3 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 and/or on-site attendance undertaken as part of these activities should be documented in Appendix A.

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.

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	Face-to-face meeting with RAPs to discuss the ACHMP and its contents. A provision of a draft copy of the document to be provided at the meeting (or via e-mail/post for those unable to attend) for more detailed review.	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	Initial notification via phone/e-mail to advice 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 should be offered.	3 weeks
	Additional assessment outside of approved areas	Initial notification via phone/e-mail to advice 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 should be offered.	3 weeks
Construction	Cultural awareness inductions	Request for a representative to conduct inductions should 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
	Archaeological excavations	An archaeological program is proposed in the northern portion of the project area, and for which five RAP representatives will be required (Section 4). Initial notification via phone/e-mail to advice of the schedule of the proposed program, followed by further excavation details, timing, personnel required, and relevant engagement and subcontract documentation, etc, via e-mail/post.	2-4 weeks*
	Cultural monitoring	Areas >1.5 m will require monitoring by two RAP representatives. Initial notification via phone/e-mail to advice of the schedule of the proposed program, followed by further monitoring details, timing, personnel required, and relevant engagement and subcontract documentation, etc, via e-mail/post.	2-4 weeks*
	Unexpected finds	Contact all RAPs via phone and e-mail to advice 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
	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 should be provided.	≥2 weeks

Notes: *Additional time may be required during particularly busy periods. The Aboriginal representatives have asked for as much time as possible, and ideally at least four weeks were feasible to relay this information.

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

Dates	Activity	Description
26 January	Invasion Day	Also known as Australia Day, the public holiday and surrounding days, are increasingly seen as a time of trauma for Aboriginal people, and any work activities will 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 SSD assessment identified three Aboriginal sites and/or deposits within the project area. One of these was a single stone artefact already considered to be destroyed prior to the completion of the ACHA. The others consist of a very low density of stone artefacts in the upper soil profile (<80 cm) across the northern portion of the project area, and a narrow strip of reddish coloured soil east of the canteen identified as having cultural values. Subsequent excavations have discovered smaller numbers of cultural materials between 80-150cm below surface, and this has prompted an ACHMP review (version 2)
- The proposed development would have adverse impacts to all of the identified Aboriginal sites and deposits, although portions of them would be unaffected by the works.
- As part of the ACHA process, a range of additional archaeological actions were discussed and have been integrated into the ACHMP, including additional test excavations in the northern portion of the site, and cultural monitoring of works >1.5 m below surface. These have been updated following further discoveries as part of the archaeological mitigation measures implemented as part of the ACHMP.

3.2 Summary of Aboriginal heritage

As part of the SSD assessment, an ACHA was undertaken in 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 of Aboriginal stone artefacts and/or shell midden material.

These analyses revealed that the project area was situated on a heavily truncated Pleistocene (10,000 - 120,000 years ago) sand dune system, known as the inner barrier. The northern portion of the school was situated on the frontal part of the dune and contained a very low density of cultural material (stone artefacts) (0.12/ m² or ~1/8 m²) within the upper 80 cm of a truncated soil profile (Figure 3.1). A single stone artefact from this background scatter had been observed during an earlier phase of investigation and registered as #04-2-0255 with Heritage NSW. Dating of the upper soil profile suggests that much of the topsoil where cultural material would likely be prevalent had been lost. These cultural materials reflect a transient or ephemeral use of the region in the past. The southern portion of the school recovered no cultural material and in places exhibited the remnants of a swamp, likely inter-swale, in-filled in the last few hundred years; and that while attractive to past visitation and exploitation would have been unsuitable for occupation or formation of cultural deposits.

Due to methodological constraints of Heritage NSW guidelines, manual excavations could only extend to depths of 1-1.5 m across the site, despite potential localised impacts probably extending below these depths. No cultural material was observed at >80 cm, and chronological samples from ~1 m indicate that these lower sediments date to ~34-38,000 years ago. While this age is within the period of Aboriginal peopling of Australia, to date there is no evidence that people were in the region by this time, and as such the potential for earlier deeply buried cultural material is considered unlikely.

From a cultural perspective, the occurrence of red Cudgen soils in part of the study area are linked to an established Dreaming story. Specifically, these red coloured soils, found across the Kingscliff region, are associated with a creation story - the Young Man and the Kangaroo.

Although no ochre deposits, common to identified Dreaming story locales, were identified within the study area, this deposit is considered to have intangible values to the local Aboriginal community as a connection to this broader story; and provides possible interpretative opportunities for the site.

During the assessment of the SSD process and ongoing consultation with the RAPs, a range of post-approval recommendations were developed to address the identified and potential cultural materials across the project area. These included the requirements to undertake additional test excavations in the northern portion of the project area that was hampered by existing structures in during the development of the ACHA; and to undertake cultural monitoring of deeper parts of the soil profile where they are subject to development activities. These additional activities were to be incorporated into an ACHMP for the project (this document). Further heritage interpretation, especially around the red Cudgen soils was also recommended, but does not form a component of the ACHMP.

3.2.1 Additional archaeological excavations

As part of an earlier ACHMP (version 1), additional archaeological excavations were proposed within the northern portion of the project area during the construction activities. This included the need to undertake a further eleven 1 m² test pits to fill gaps in the previous works undertaken as part of the ACHA (Figure 3.1).

In April 2023, all but two of these test pits were completed by archaeologists and Aboriginal participants (Table 1.2). These works adopted the same methods as undertaken for the ACHA, including manual excavation of test pits in 10 cm spits to depths of 150 cm below current surface. All material was dry-sieved through a 5 mm mesh and any cultural materials recovered.

These works identified a further 44 stone artefacts. With three exceptions, these align with previous findings, and are primarily found in the upper 40 cm – primarily reworked or fill units - and indicative of either an ephemeral use of the site in the late Holocene (<5,000 years ago) and/or the remnants of a more extensive visitation now lost through the establishment of the school. However, three artefacts were recovered from depths of 110-130 cm below surface within test pits #33 (n=2) and #35 (n=1), and represent the deepest cultural materials encountered on the site. OSL ages were recovered from a nearby test pit (containing no cultural materials), and suggest that these depths may be >13,000 years ago. These OSL dates require validation with samples recovered from soil units which are directly associated with cultural materials.

Based on these findings, an update to the ACHMP has been prompted to enable refinement of the archaeological excavations outlined in Section 4 to further explore these deeper cultural deposits and to suitable manage these deeper cultural deposits, which have not been encountered on the project to date.

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 Figure 3.1.

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

AHIMS #	Site name	Site type	Archaeological significance	Description
04-2-0255	Kingscliff Public School	Isolated artefact	Low	Isolated basalt flake beneath demountable building 2W. Could not be relocated during the ACHA.
04-2-0263	KPS area of archaeological sensitivity	Artefact Scatter	Low*	A low density background scatter of stone artefacts on the frontal dune (between elevations of ~21-24 m AHD), within buried but partly truncated natural topsoils and/or subsoils of the former dune.

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

AHIMS #	Site name	Site type	Archaeological significance	Description
04-2-0279	Red Cudgen Soils	Intangible cultural value area	Moderate	The physical manifestation of a mythological story of the Young Man and the Kangaroo, embedded in the landscape from Kingscliff to Theresa Mountain.

Notes: * Recent findings outlined in Section 3.2.1 for this site potentially indicate cultural deposits of deep antiquity, and which are proposed for further investigation in Section 4. The significance of the site remains unchanged here while these works are ongoing, however may warrant revision to moderate or high significance should additional works validate these initial findings.

3.4 Potential impacts

The project design will adversely affect one artefact scatter site and one area of cultural value (Table 3.2, Figure 3.2). This includes:

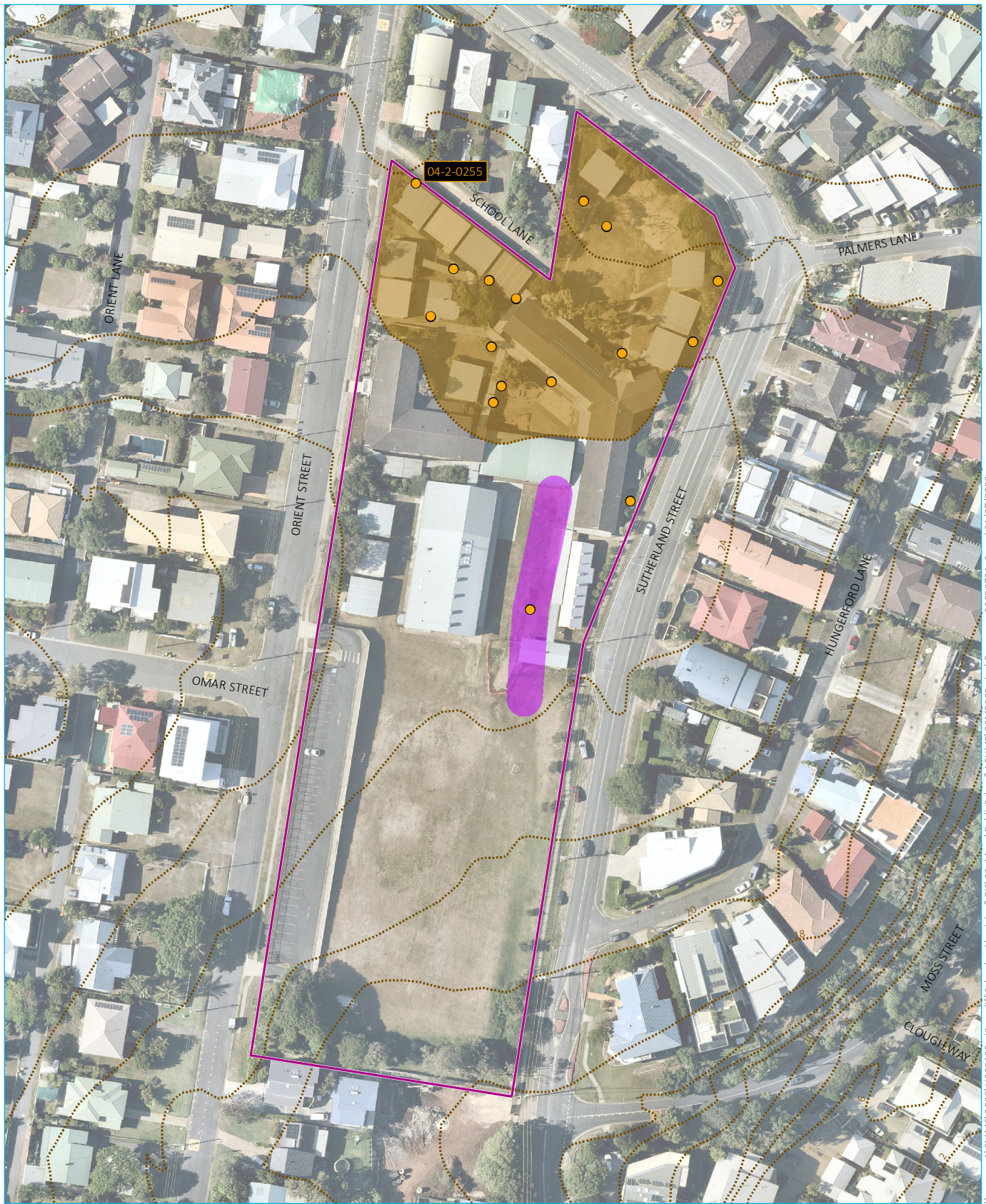
- the area of archaeological sensitivity on the frontal dune (between elevations of ~21-24 m AHD where very low densities of stone material are likely to be encountered at depths of 20-130 cm below ground surface); and
- a discrete area of red Cudgen soils that have cultural value to the local community as part of the ‘Young Man and the Kangaroo’ creation story. It must however be highlighted that the importance of these natural soil variations are primarily in their intangible values associated with the Dreaming connection, rather than the physical composition of the soil profile.

An isolated object (stone artefact) would also be affected by the works but is considered previously destroyed by natural and/or ongoing school activities prior to the SSDA.

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

AHIMS ID	Site name	Proposed activity causing harm	Degree of harm
04-2-0255	Kingscliff Public School	Demolition of existing buildings	Complete
04-2-0263	KPS Artefact Scatter	Demolition of existing buildings, new classroom, outdoor play space	Partial
04-2-0279	Red Cudgen Soils and the Wounded Kangaroo	Demolition of existing buildings, new entry pavilion, new classroom	Partial

Note: 04-2-0255 was not re-located following its initial discovery at the beginning of the project and is considered to have been previously destroyed by natural/current school activities prior to the implementation of the construction phase.



Source: EMM (2023); Nearmap (2020); DFSI (2017)

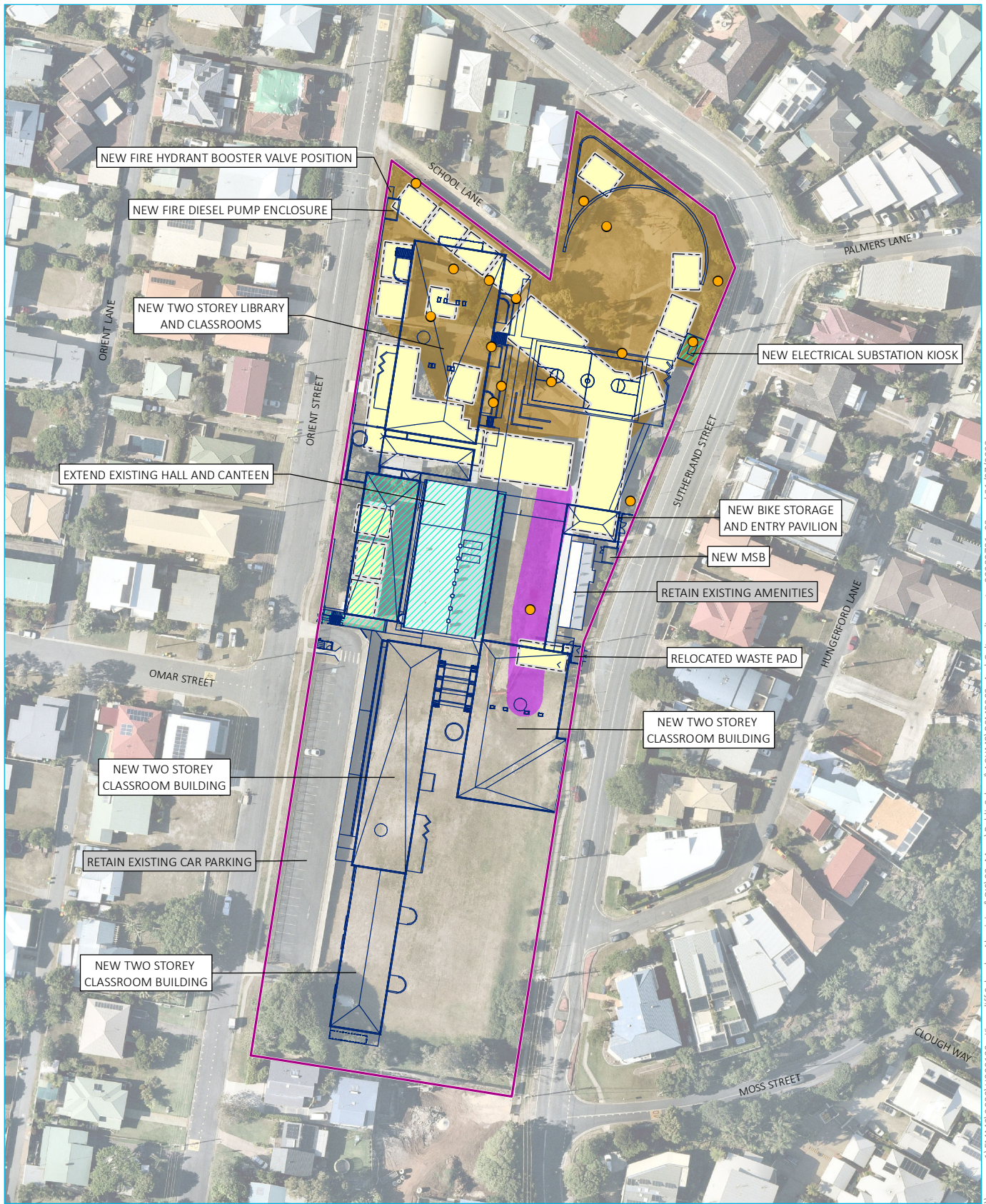
KEY

- Where ACHMP applies
- Topographic contour (2 m)
- Cultural material location
- Archaeologically sensitive area
- Red Cudgen sands

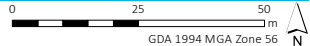
Existing archaeological resource
for the project area

Indigeco
Aboriginal cultural heritage management plan
Figure 3.1

\\emmsvr1\EMM\3\2020\1200188 - Kingscliff Schools - Aboriginal\GIS\02_Maps\PublicSchool\ACHMP\PSMP\002_ArchResource_2023\0731_3.mxd 31/07/2023



Source: EMM (2023); DFSI (2017); GA (2011); Nearmap (2020)



- KEY**
- Where ACHMP applies
 - Proposed design
 - Existing building to be demolished
 - Managed under another environmental approval
 - Cultural material location
 - Archaeologically sensitive area
 - Red Cudgen sands

Project impacts to identified Aboriginal heritage

Indigeco
Aboriginal cultural heritage management plan
Figure 3.2

\\lemmsv1\EMM\3\2020\1200188 - Kingscliff Schools - Aboriginal Schools - Original\GIS\02_Maps\PublicSchool\ACHMP\PSMIP003_ArchCulturalImpacts_20230731_03.mxd 31/07/2023

4 Mitigation and management

4.1 At a glance

- Three project specific mitigation measures are required **during the construction phase**. These include:
 - additional archaeological excavations across the northern of the project area to be implemented following removal of demountables and extant buildings, as presented in Figure 4.2 and methods outlined in Section 4.2.1 and Appendix D
 - additional archaeological excavation focussing on deposits between 80-150 cm below surface in test pits #33 and #35 as presented in Figure 4.3 and methods outlined in Section 4.2.1 and Appendix D where development impacts cannot be avoided
 - cultural monitoring by RAPs of all construction activities deeper than 1.5 m below current surface, and in accordance with methods outlined in Section 4.2.2.
- A number of ongoing general post-approval heritage requirements are required **during construction and 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 a number of Aboriginal sites and deposits 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 Additional archaeological excavation

i Investigative test pits

The northern portion of the project area has evidence of cultural deposits (Section 3.3; Figure 3.1). These deposits could not be comprehensively investigated as part of the pre-SSDA process due to the extant buildings and demountables currently present on the site. As such additional, archaeological excavations are required during the proposed development to further characterise, and if required salvage (preservation in record) any cultural materials across this zone. These were partially implemented in April 2023, but several remained incomplete, and still require implementation.

Figure 4.2 and Figure 4.3 presents the proposed locations of additional investigative archaeological excavations required during the project. The additional test pits have been designed to supplement the archaeological program undertaken during the ACHA, and where construction is newly proposed. Salvage excavations focussing on one or several of these initial test pit locations would be dependent on cultural thresholds being met. The required excavation methods and the thresholds for additional work are outlined in Appendix D.

In addition to these standard excavation techniques, the following requirements should be met:

- The removal of the demountables and concrete slab/s of any extant buildings proposed for removal in the northern portion of the project area (Figure 4.1) should be monitored by a heritage professional and/or RAPs. Guidance should be taken from these monitors to ensure the cultural deposits of interest are minimally affected through any removal, and that the proposed works are stopped to maximise the retention of any cultural deposits prior to the archaeological excavations.

- The archaeological team should consist of three archaeologists and five RAPs (including representatives of the Tweed Byron LALC and McDonald family) with ancillary support provided by the contractor. Ancillary support should consist of a surveyor to peg out the archaeological excavation locations, site hut/porta-loo, access to water, and an excavator for backfilling (as required).

Once the archaeological excavations have been completed to the satisfaction of the heritage consultant in discussion with the RAPs, the construction works in these areas may progress. A notification of the completion of these works should be provided to all key stakeholders (Table 1.2).

Post excavation analysis and reporting should be undertaken in accordance with Appendix D, and build upon the results of the ACHA. The reporting can be developed in parallel with the construction and is not required before development activities resume. Once developed, the report should be provided to the RAPs for comment in accordance with Section 2.3. Once finalised the report should be submitted to Heritage NSW's AHIMS database as outlined in Appendix B.

ii Investigative and salvage excavations at TPs #33 and #35

Following recent works undertaken as part of additional excavations required in ACHMP (version 1), two test pits were shown to contain deep cultural materials, and which may be of significant antiquity (Section 3.2.1.). Specifically, two cultural deposits each $\sim < 25 \text{ m}^2$ and centred upon test pits #33 and #35 (Figures 3.1 and 4.1). The cultural deposits were found at depths of 110-130 cm below surface, which equates to 23.39-23.69 m AHD in TP#33 and 23.54-23.84 m AHD in TP#35. This approach may also be applied to test pits #34 and #29, if cultural deposits below 80 cm are encountered.

Current project design options are being explored to determine whether impacts to these deposits would occur. This would result in three potential additional investigative and/or salvage archaeological requirements:

1. the deposits and a suitable buffer – above 23.98 m AHD in TP#33 and above 24.04 m AHD in TP#35 - can be entirely avoided by proposed development activities. In this situation, no further works would be required and the deposits can be avoided by the project. Suitable avoidance and protection protocols should be established prior to construction activities, and which are outlined further in Section 4.2.3.
2. localised development impacts would occur in close proximity ($< 5 \text{ m}$) of TP#33 and/or TP#35 to depths $> 90 \text{ cm}$ below current surface (or below 23.98 m AHD around TP#33 and below 24.04 m AHD around TP#35). In this situation, targeted additional test excavations would be required in areas where disturbance may occur to these deposits.
3. large-scale impacts in equivalent or exceeding 50 % of the 25 m^2 cultural deposits at each location to depths $> 90 \text{ cm}$ below current surface (or below 23.98 m AHD around TP#33 and below 24.04 m AHD around TP#35). In this situation, open area archaeological salvage would be required of the cultural deposit prior to ground disturbance activities to these depths occurring.

In the case of (2) and (3) additional archaeological excavations in the vicinity of TPs #33 and #35 would be required. The excavations would adopt the methods and requirements outlined in Appendix D, with the following modifications:

- Additional research questions to be considered:
 - Are there further cultural materials present at depths of $> 80 \text{ cm}$ below current surface ($\sim 23.4 \text{ m AHD}$)? If present, are they in situ or have they been subject to bioturbation?
 - What is the chronological age of the deposits in the immediate vicinity of the previously recovered and any newly discovered cultural materials?

- For localised impacts as per (2) above
 - 1 m² test pits – the minimum size that can access these depths – would be established at any proposed development activity within 25 m² centred on TPs #33 and/or TP #35 (Figure 4.3). Larger proposed impacts and/or linear infrastructure would be investigated/salvaged as contiguous adjoining 1 m² test pits encompassing the footprint of the proposed impacts.
 - Archaeological excavations would be dug in 20 cm spits or intervals between 0-80 cm below current surface, with all sediment sieved through a 5 mm mesh.
 - Archaeological excavations would be dug in 5 cm spits or intervals between 80-150 cm below current surface, with all sediment sieved through a 3 mm mesh.
 - No archaeological expansion or salvage excavation would be undertaken beyond the proposed impact footprint regardless of findings from the excavations. Any remaining portions of the cultural deposits should be managed in accordance with Section 4.2.3.
- For large-scale impacts as per (3) above
 - Archaeological excavation would consist of a 9 m² (3 x 3 m) centred on both TP#33 and TP#35 (Figure 4.3). Expansion beyond this size of excavation would only occur where substantive cultural materials are recovered in depths >80 cm below current surface. Where encountered, excavation would extend to 25 m² (5 x 5 m), or equivalent quantum of excavations where a square is unsuitable to address the research objectives and aims.
 - Archaeological excavations would be dug in 20 cm spits or intervals between 0-80 cm below current surface, with all sediment sieved through a 5 mm mesh.
 - Archaeological excavations would be dug in 5 cm spits or intervals between 80-150 cm below current surface, with all sediment sieved through a 3 mm mesh.

In addition to these standard excavation techniques, the following requirements should be met:

- The archaeological team should consist of three archaeologists and five RAPs (including representatives of the Tweed Byron LALC and McDonald family) with ancillary support provided by the contractor. Ancillary support should consist of a surveyor to peg out the archaeological excavation locations, site hut/porta-loo, access to water, and an excavator for backfilling (as required).

Once the archaeological excavations have been completed to the satisfaction of the heritage consultant in discussion with the RAPs, the construction works in these areas may progress. A notification of the completion of these works should be provided to all key stakeholders (Table 1.2).

Post excavation analysis and reporting should be undertaken in accordance with Appendix D, and build upon the results of the ACHA. The reporting can be developed in parallel with the construction and is not required before development activities resume. Once developed, the report should be provided to the RAPs for comment in accordance with Section 2.3. Once finalised the report should be submitted to Heritage NSW's AHIMS database as outlined in Appendix B.

4.2.2 Cultural monitoring

During the ACHA process, archaeological excavations were successfully undertaken to depths of 1.5 m. However, the presence of cultural materials could not be ascertained below 1.5 m, and as such these areas require additional

investigation during the project. Specifically, the following activities where they exceed 1.5 m would require cultural monitoring:

- sheet or bore piling (or equivalent) where sediment will be extruded from depths of >1.5m below surface as part of the process;
- underground services, such as sewer, water, gas, etc; and
- any other deep excavations required as part of the project.

Where these activities occur, the following cultural monitoring must be implemented:

- A member of the Tweed Byron Bay LALC and the McDonald family will undertake monitoring of the works and be provided an opportunity to investigate any extruded/excavated sediment for cultural materials. This would be constrained to visual observation and/or opportunistic hand sieving as the work progresses, and not as part of any more extensive archaeological recovery program. Access to the trenching/excavation areas would be dictated by the WHS procedures and protocols associated with the specific activity.
- Where the RAPs identify cultural materials of significance (using thresholds presented in Appendix D), unexpected finds protocols as per Section 4.3.2 should be implemented. Given the depth and significant age of such finds at these depths, both avoidance of additional works, as well as an archaeological excavation of the area should be expected. Given the deep depths, significant ancillary support in the form of shoring systems would be required for the latter.

4.2.3 Avoidance and surface protection

As outlined in Section 3.2.1, potentially significant cultural materials have been encountered at TP#33 and TP#35. These deposits are generally found below >80 cm below the current surface (below ~23.5 m AHD). Several development refinements and options are being explored to entirely or partially avoid these deposits. Where avoidance can be achieved, the following actions should be implemented to reduce inadvertent short and long-term impacts:

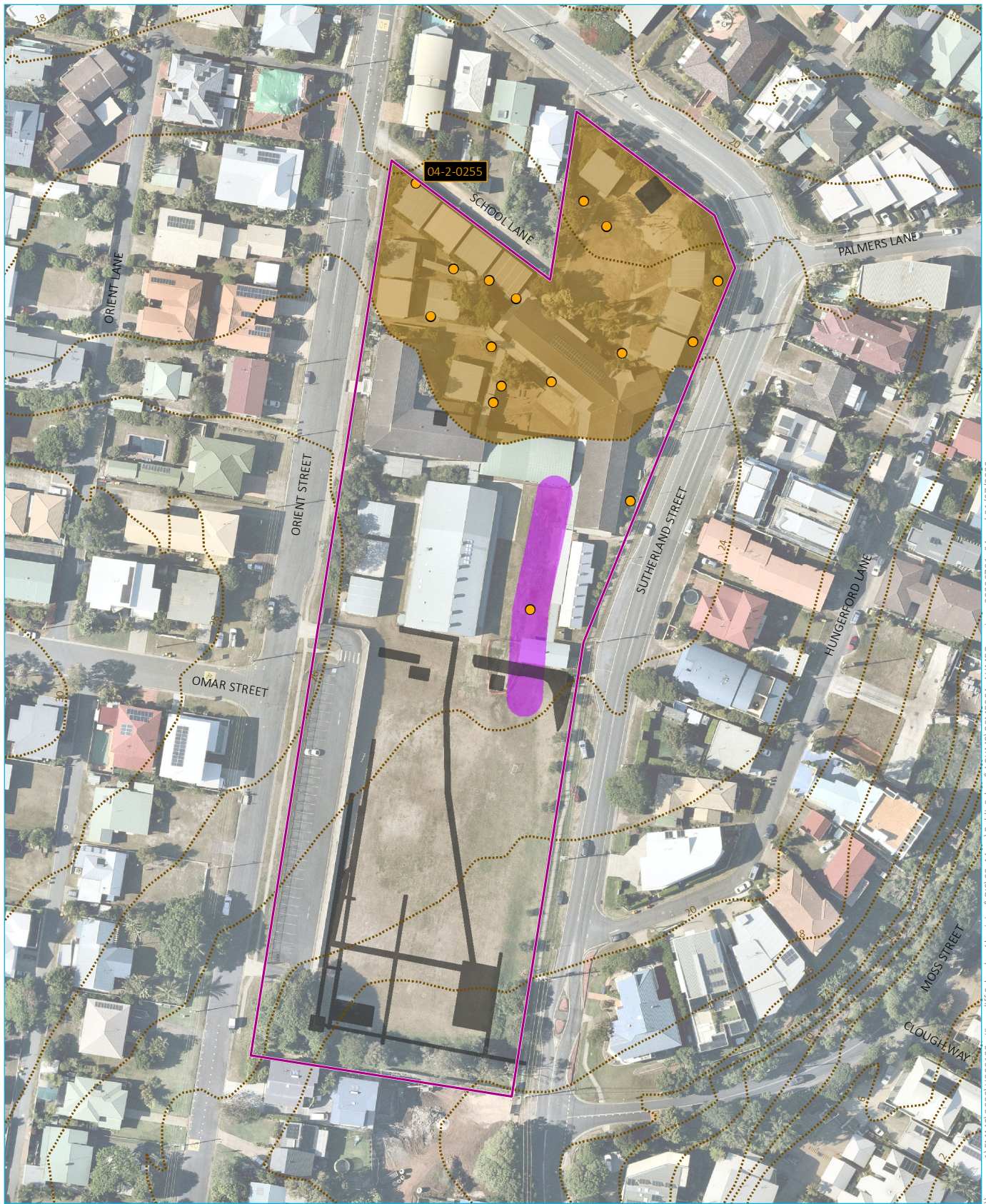
- During construction:
 - Incorporation of the sites, curtilages, and obligations for their protection into cultural inductions for site personnel as per Section 4.3.1.
 - Where available, incorporation of the sites and curtilage into 'no-go' and/or constraint layers within the development document packages; and their inclusion into ground disturbance permit/approval requirements for the project.
 - Establishment of fencing and/or signage encompassing the two cultural deposits during works in and around this location.
 - Where necessary, establishment of surface protection such as heavy duty ground protection mats, or equivalent.
 - The installation of underground/detectable tape at depths of 50 cm below current ground surface across the surface of the cultural deposits.
- Following construction and long term conservation:

- If not undertaken, the installation of underground/detectable tape at depths of 50 cm below current ground surface across the surface of the cultural deposits.
- Establishment of permanent (non-intrusive) signage to indicate cultural deposits at depth and to contact a heritage professional prior to excavation.
- Addition of Aboriginal heritage to any planning certificate issued by Council under Section 10.7 of the *Environmental Planning and Assessment Act 1979* to alert any purchaser or consent authority to the Aboriginal heritage values of the site, and place restrictions on future development that may affect these values.

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. However, for this project, many of the activities will have to be undertaken during construction, since exposure of the soil profile will not occur until certain parts of the site are demolished and/or removed. Specifically, the following timing must be adopted:

- Pre-construction
 - N/A
- Construction
 - Additional archaeological excavations as outlined in Section 4.2.1 should be undertaken following the removal of the demountable and/or other structures and before any further development activities, notably in the vicinity of TPs #29, #33, #34 and #35 where investigations remain incomplete. Following removal, no ground preparation or other surface disturbance should be undertaken within areas where archaeological excavations remain incomplete, and these areas require protection to avoid inadvertent impacts where activities may be occurring within 8 m of the test pit location; and
 - Cultural monitoring as outlined in Section 4.2.2 should be undertaken for any activities where disturbance >1.5 m below the current surface is proposed. This includes piling where sediment would be extruded and any excavation of services or other foundations that exceed this depth.



Source: EMM (2023); Nearmap (2020); DFSI (2017); Accor (2021)

0 25 50 m
GDA 1994 MGA Zone 56

KEY

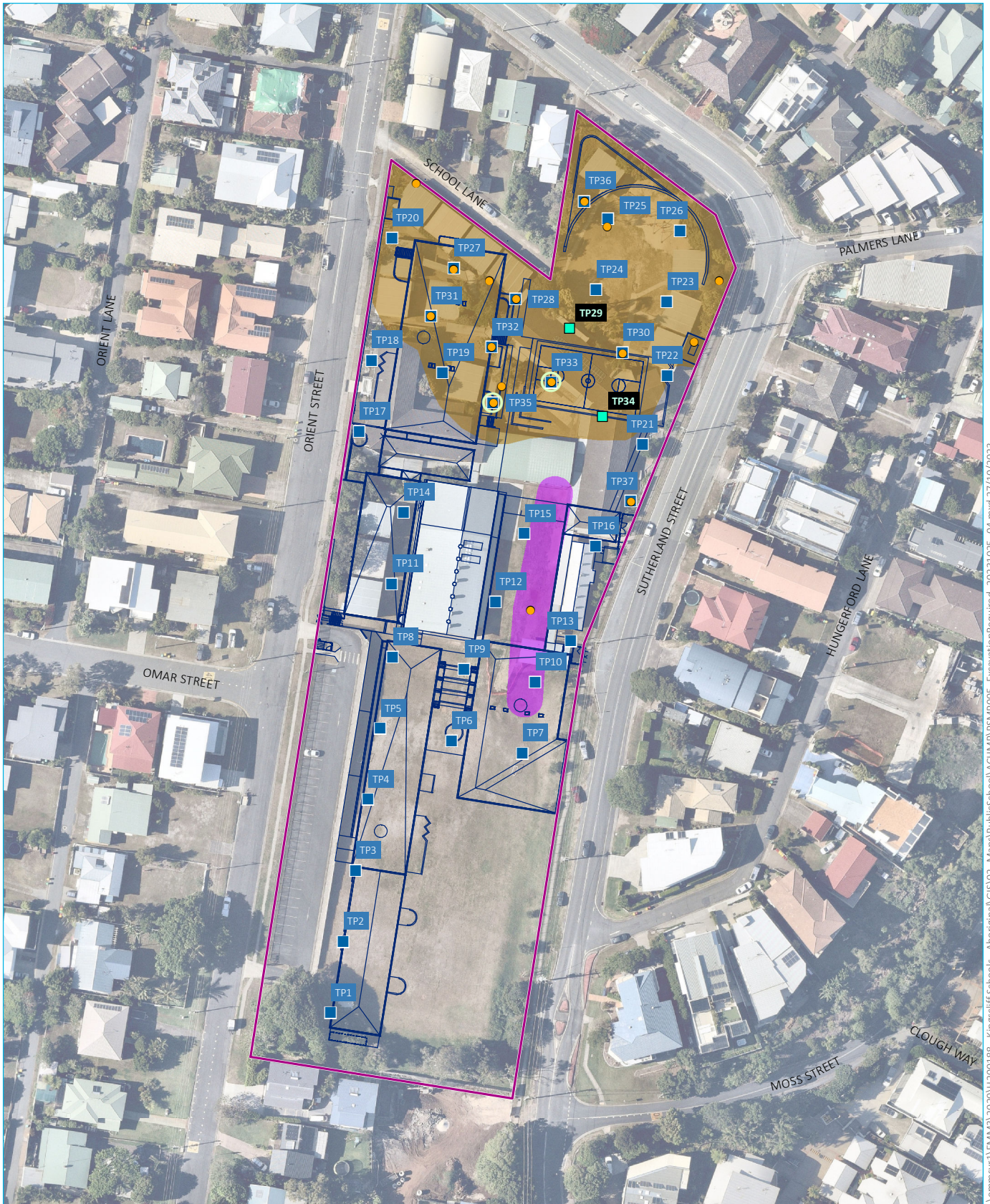
- Where ACHMP applies, including cultural inductions, unexpected finds and additional assessment where necessary
- Where impacts >1.5m are proposed, cultural monitoring required
- Additional archaeological excavation required
- Red Cudgen soils
- Cultural material location
- Topographic contour (2 m)

Summary of Aboriginal heritage management requirements

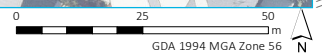
Indigeco
Aboriginal cultural heritage management plan
Figure 4.1



\\emmsvr1\EMM3\2020\1200188 - Kingscliff Schools - Aboriginal Heritage - Original\GIS\02_Maps\PublicSchool\ACHMP\PSMPO04_AHMPOverview_2023\0731_04.mxd 31/07/2023



Source: EMM (2023); Nearmap (2020); DFSI (2017)

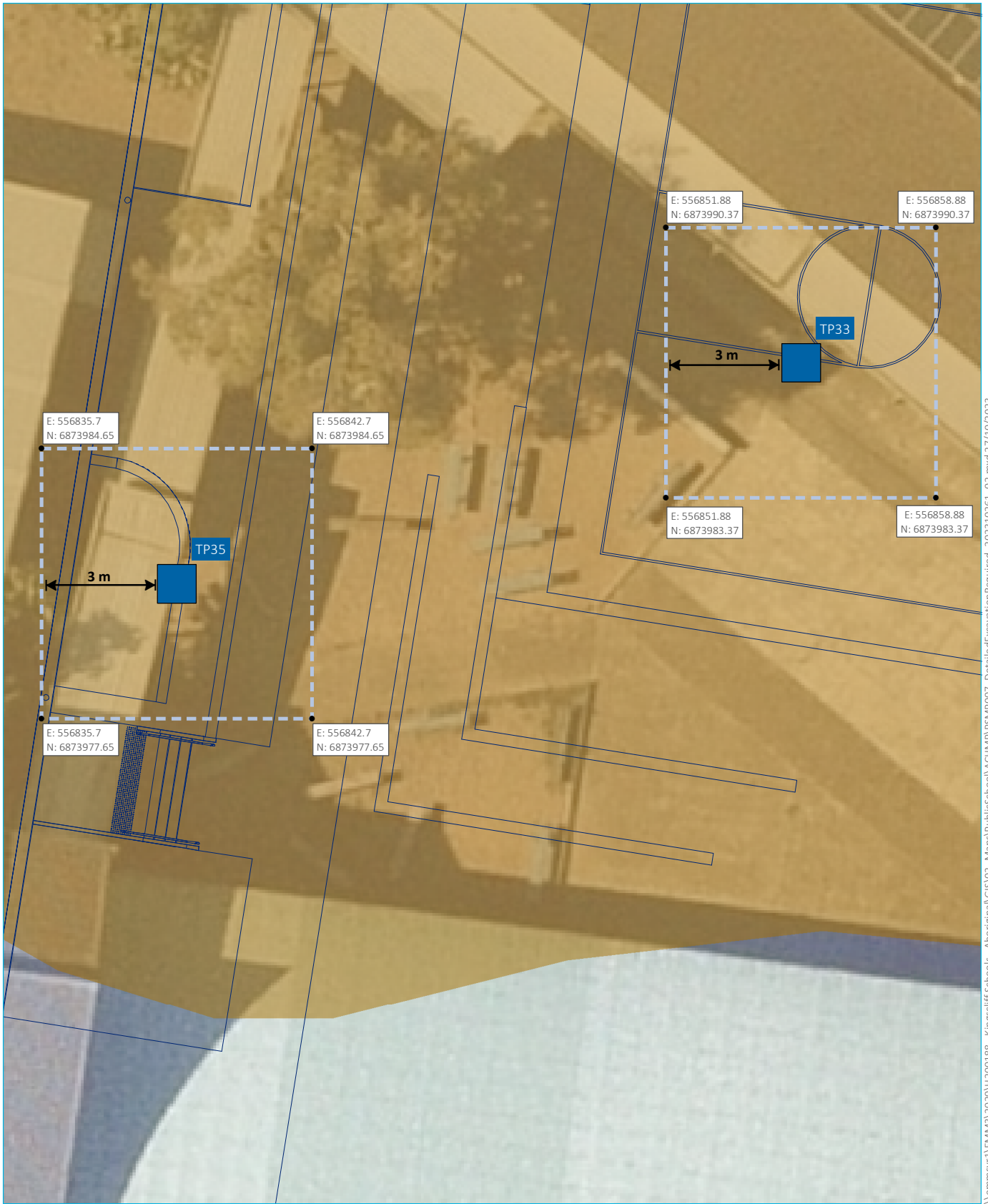


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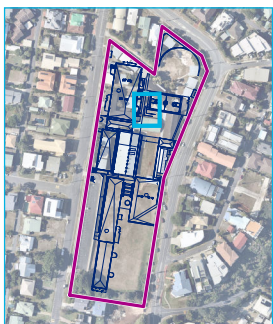
- Where ACHMP applies
- Archaeologically sensitive area
- Red Cudgen soils
- Proposed design
- Previously excavated test pit
- Proposed test pit
- Cultural material
- Additional salvage required

Aboriginal stakeholder consultation

Indigeco
Aboriginal cultural heritage management plan
Figure 4.2



Source: EMM (2023); Nearmap (2020); DFSI (2017)



- KEY**
- Previously excavated test pit
 - 3 m buffer
 - Archaeologically sensitive area
 - Proposed design
 - Coordinate point



Salvage excavation required

Indigeco
Aboriginal cultural heritage management plan
Figure 4.3



\\emmsvr1\EMM\3\2020\H\200188 - Kingscliff Schools - Aboriginal Schools - Original\GIS\02_Maps\PublicSchool\ACHMP\PS\IP007_DetailedExcavationRequired_202310261_02.mxd 27/10/2023

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 a representative of the RAPs prior to any ground-disturbance. Depending on the required frequency, subsequent inductions may be undertaken 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. The lead contractor 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 stone artefact scatters, shell middens, and certain types of soil profile;
- Aboriginal sites can be hard to recognise, but a range of photographs giving examples should be provided to inductees to show the types of material that may be expected; and
- 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.

i Fostering cultural heritage awareness

The lead contractor will provide opportunities for RAP representatives to participate in activities related to training and fostering cultural heritage awareness in the project area. This will involve the lead contractor exploring opportunities to involve RAPs in training the lead contractor and/or relevant subcontractors to give cultural heritage inductions, toolbox sessions during construction and operations (as may be relevant) and provide updates on Aboriginal heritage matters for the project. The lead contractor will also explore opportunities to work with suitable Aboriginal people to develop and implement Cultural Heritage Awareness Training for the life of the project.

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 and/or newly observed cultural materials 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 must be completed by a heritage professional(s) with participation the RAPs representative (see Section 2.3). Avoidance of newly identified Aboriginal objects is always the preferred heritage outcome where feasible. Mitigation measures should 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 (Appendix B).

Where avoidance can be achieved, the following management of the cultural materials should 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 should 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.

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 Schools infrastructure as soon as possible.
 - All construction that could potentially harm the Aboriginal objects or values must cease (including stopping all construction within at least 15 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. An initial step to contact the Tweed Byron Local Aboriginal Land Council (T: 0407 643 349) to provide timely on-site advice may be considered where necessary.
 - 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 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 should be sought 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 (including stopping all construction within at least 15 m). Only construction that is required to make the area safe is permissible.
 - 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 Schools infrastructure as soon as possible.
 - The human remains are to be protected with the establishment of a no-go zone.
 - The person in charge should notify NSW Police of the discovery as soon as possible. All subsequent steps will be dictated by the NSW Police.
 - Police contact: Chief Inspector Bobbie Cullen; Special Constable Jackie Lilly – T: 07 5506 9499
 - 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 should 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) should 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 should be organised as soon as possible. Once an agreement on the subsequent management of the find is undertaken, Heritage NSW should be advised of the proposed course of action to be implemented and seek approval.
 - Discussions should 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, should 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, should 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 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 should be sought to allow works to resume.
 - 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). This should include submission of the identified cultural materials and findings to the Heritage NSW Aboriginal Heritage Information Management System.
-

4.4 Management of recovered cultural materials

All recovered cultural material should:

- At the heritage consultant's office for archaeological analysis. The assemblage should be stored in a locked cabinet.
- Once analysis has been completed, the assemblage should be re-buried within the project area in a location determined by the RAPs. A default location will be in a previously excavated test pit in the north-eastern most corner of the project area (Figure 4.4) unless an alternate location is identified in by the RAPs during the project.

4.5 Any proposed activity outside approved project area

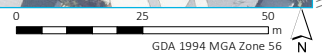
Any activity that may cause ground disturbance outside of the approved project area (Figure 1.1), or outside other existing approved areas under the development consent, will not occur without prior Aboriginal heritage assessment and other relevant legislative and internal approvals sought as required.

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.
- If the proposed activity requires a separate approval pathway not permissible as part of the existing SSDA, then 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. Depending on the outcomes of the due diligence assessment, further investigation may be required in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales* (DECCW 2010c) and/or other relevant guidelines. If Aboriginal objects are likely to be impacted, further approvals under the National Parks and Wildlife Act 1974 and/or Environmental Planning and Assessment Act 1979 as required may be required prior to work being permissible.



Source: EMM (2021); Nearmap (2020); DFSI (2017)



KEY

- Where ACHMP applies
- Cultural assemblage re-burial location

Proposed cultural assemblage
re-burial location

Indigeco
Aboriginal cultural heritage management plan
Figure 4.4

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 is 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 SSDA conditions and will include auditing the following measures:

- protection of all nominated sites;
- inductions are taking place and include appropriate material; and
- 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 5.2.

5.2.3 Non-conformance

Any non-conformance will be subject to a detailed investigation by SINSW 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; and
- next steps, including the need for additional heritage activities and/or requirements to contact DPIE/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; and
- document any changes in procedures resulting from process improvement.

5.3.2 ACHMP review and update

The ACHMP will be revisited and updated in the following circumstances:

- every six months from initial finalisation until the completion of ground disturbance activities;
- where proposed activities are required outside of approved areas as defined under the SSDA;
- where modification to the SSDA occurs that may affect impacts to Aboriginal heritage;
- where complaints and/or non-conformances have been identified that require changes to ensure suitable management of Aboriginal heritage in future stages of the project;
- where approved changes to the project change or remove previously planned impacts on Aboriginal heritage where mitigation was proposed in the ACHMP but is no longer required; and/or
- where other conditions or situations arise that require the updating of this plan.

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 should be undertaken in accordance with Section 2.3.

References

EMM, 2021, Kingscliff Public School Redevelopment - Aboriginal cultural heritage assessment. Unpublished report for Indigeco and Schools Infrastructure NSW.

Abbreviations

Abbreviation	Full term
ACHA	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
DPIE	NSW Department of Planning, Industry 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
SINSW	Schools Infrastructure NSW
SSD	State Significant Development
SSDA	State Significant Development 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

Date	Incoming/Outgoing	External Organisation	Contact made by (internal organisation)	Contact received from (external organisation)	Method	Details of communication
8.10.21	Outgoing	All registered Aboriginal parties	Alan Williams	Various	E-mail	Provided a draft version of the draft ACHMP and sought people's availability to meet and discuss the document
15.10.21	Outgoing	All registered Aboriginal parties	Alan Williams	Various	E-mail	A follow up to try and obtain people's availability for a meeting to discuss the draft ACHMP
17.10.21	Incoming	-	Alan Williams	Marcus Ferguson	E-mail	Advised the area was not his Country and was happy for the LALC and others to inform the process. Sought to be removed from the ACHMP.
5.11.21	-	Tweed Byron LALC, Jackie MacDonald, Paul Buxton	Alan Williams, Gareth James, Martyn Charlett, Laura Goodall	Warren Phillips, Maurice Gannon, Jackie MacDonald, Paul Buxton	Meeting	Undertook a face-to-face meeting to discuss the draft ACHMP and seek input/concerns prior to finalisation. The minutes from this meeting are presented in subsequent sections of the ACHMP.
6.11.21	Outgoing	Tweed Byron LALC, Jackie MacDonald, Paul Buxton	Alan Williams	-	Email	Distributed draft minutes of the meeting and sought comment
11.11.21	-	Tweed Byron LALC, Jackie MacDonald, Paul Buxton	Alan Williams	-	Email	Distributed final minutes of the meeting and sought comment before finalisation
24.1.22	-	Tweed Byron LALC, Jackie MacDonald, Paul Buxton	MBB	Jackie MacDonald	On-site activity	Attended site as part of concurrent AHIP approved works. This included recovery of identified stone artefacts.
7-9.3.22	-	Tweed Byron LALC, Jackie MacDonald, Paul Buxton	MBB	Warren Phillips, Maurice Gannon, Paul Buxton	On-site activity	Cultural monitoring of sewerage works as part of concurrent AHIP approved works.
17-20.4.23	-	Tweed Byron LALC, Jackie MacDonald, Paul Buxton, Jason MacDonald	Georgia Burnett	-	Fieldwork	Undertook additional excavations required as part of the ACHMP project specific mitigation measures.
3.8.2023	-	All RAPs	Georgia Burnett	-	Email	Distributed invitation to meet on site to discuss ACHMP updates on 14 August 2023.
10.8.2023	-	All RAPs	Georgia Burnett	-	Email	Distributed short letter for context for the discussions for the upcoming meeting.

Table A.1 **Consultation log**

Date	Incoming/Outgoing	External Organisation	Contact made by (internal organisation)	Contact received from (external organisation)	Method	Details of communication
14.8.23	Outgoing	Tweed Byron LALC, Jackie MacDonald, Paul Buxton (apology)	Georgia Burnett	Warren Phillips, Jackie MacDonald	Meeting	Undertook a face-to-face meeting to discuss additional excavations within the site following findings of the recently implemented test excavation and seek input/concerns prior to finalisation. The minutes from this meeting are presented in subsequent sections of the ACHMP.
20.8.2023 -		All RAPs	Georgia Burnett	-	Email	Distributed meeting minutes.
29.8.2023 -		Tweed Byron LALC, Jackie MacDonald, Paul Buxton	Georgia Burnett	Warren Phillips, Jackie MacDonald, Paul Buxton	Online meeting	Presented ACHMP changes to the document, based on feedback provided during previous meeting.
30.8.2023 -		All RAPs	Georgia Burnett	-	Email	Distributed draft ACHMP, highlighting key areas where changes had been made. Requested comments by 20 September 2023.
11.9.2023 -		All RAPs	Georgia Burnett	-	Email	Reminder of close of comments for ACHMP on 20 September 2023.

Table A.1 **Consultation log**

Date	Incoming/Outgoing	External Organisation	Contact made by (internal organisation)	Contact received from (external organisation)	Method	Details of communication
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A.2 Aboriginal feedback

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



Appendix B

Legislation and obligations



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 DPIE for:
 - state significant development (SSD);
 - state significant infrastructure (SSI); or
 - a major project; or
 - authorised by a SSD/SSI approval under the EP&A Act.

Completed forms must be submitted to the AHIMS Registrar at 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>.



Appendix C

Aboriginal site descriptions



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.
Stone quarry	Usually, a source of good quality stone which is quarried and used for the production of stone tools. 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.



Appendix D

Archaeological excavation methodology



D.1 Excavation methods

The following section outlines a standard excavation methodology that can be adopted in the case of additional required archaeological excavations (Section 4.2.1) and any unexpected finds procedures (Section 4.4). This approach should 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 should the cultural materials be conserved and managed in future?

D.1.2 Investigative phase

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

- Excavation
 - A grid of 1 m² 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 m² 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) should 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/m² 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 m² (5 x 5 m) and up to 100 m² (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 m². Each square would be given an alpha-numeric label for identification purposes.
 - All excavation would be undertaken in 5 cm spits to culturally sterile depths – typically between 80-130 cm below surface (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.
- 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.



Appendix E

Complaints register



Table E.1 Complaints register

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



Appendix F

Document control



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
1	14.3.22	Alan Williams	Laura Goodall	No	Updated Table 1.1 to align conditions of approval with the plan. Minor updates of the unexpected finds processes in Table 4.1 and 4.2 to address the conditions of approval.	2-5, 21, 22
2	22.8.23	Alan Williams	Laura Goodall	Yes	Updated archaeological understanding, project specific archaeological requirements for the project in Section 4.2 and Appendix D. Various other typos and editorial changes	ES.1, 1, 4, 9, 10, 11, 14-18 inclusive, A.2



