

# **Newcastle Education Campus**

## **Aboriginal Cultural Heritage Management Sub-Plan**

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Prepared for NSW Department of Education

March 2024

# Newcastle Education Campus

## Aboriginal Cultural Heritage Management Sub-Plan

NSW Department of Education

E220193 RP#1

March 2024

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# This document at a glance

## ES1.1 Purpose of document

The NSW Department of Education (the proponent) is proposing to upgrade the existing Newcastle High School, 25a National Park Street, Newcastle West, NSW, to create a new Newcastle Education Campus. As part of the approval for this project, an Aboriginal cultural heritage management sub-plan (ACHMP) is required to provide a framework for managing Aboriginal heritage during the pre-construction and construction phases of the project.

This document has been developed to address these conditions. To conform with the conditions of SSD-41814831, the proponent commits to implementing the requirements of the ACHMP prior to and during the proposed development activities.

## ES1.2 Summary of Aboriginal heritage

Previous investigation has identified two Aboriginal sites within the project area (and labelled as NEC AS 1 and NEC BS1). NEC BS1 consisted of a low-density stone artefact scatter (<5/m<sup>2</sup>) found in the upper soil profile and extending across the project area. NEC AS 1 was a moderately significant artefact scatter, with localised densities of >20/m<sup>2</sup> and found in the northeastern/eastern corner of the project area.

The proposed development would have adverse impacts to both sites, although portions of the site would be unaffected by the works.

## ES1.3 Project specific Aboriginal heritage requirements

- One project specific mitigation measure is required **prior to the construction phase**:
  - Archaeological excavations across NEC AS 1 in the north eastern/eastern corner of the project area to be implemented, as presented in Figure 4.1 and methods outlined in Section 4.2.1 and Appendix D.

## ES1.4 General Aboriginal heritage requirements

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

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

## ES1.5 Other useful information

The ACHMP also provides guidance on:

- processes to maintain ongoing consultation with the project's 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).

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# 1 Introduction

## 1.1 Purpose of document

NSW Department of Education (the proponent) is proposing to upgrade the existing Newcastle High School, 25a National Park Street, Newcastle West, NSW, to create a new Newcastle Education Campus (Figure 1.1). As part of the assessment process needed to obtain the approval for these works to proceed, investigation of Aboriginal cultural heritage for the project area was undertaken by EMM Consulting Pty 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 2023). Further details of the report and its findings are presented in Section 3.1. The report recommended that an Aboriginal cultural heritage management plan (ACHMP) be developed following the approval to provide a framework for managing Aboriginal heritage during the pre-construction and construction phases of the project. This recommendation has now been included in the State Significant Development Approval (SSDA), albeit named a 'sub-plan' to align with the broader environmental management system (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)
- protocols for undertaking activities in areas that have not been previously assessed (Section 4.5)
- other administrative requirements, including post-project management of Aboriginal finds and recovered material, ongoing compliance, regular review and update of the ACHMP to ensure its functionality is maintained through the project (Section 5).

### 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*. DPE has provided the following identifiers for the approvals: **SSD-41814831**.

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

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

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

Requirement	Section addressed
A8. Where conditions of this consent require consultation with an identified party, the Applicant must:	Consultation has been in accordance with this condition. See section 2, 4 and Appendix A.



<p>a) Consult with the relevant party prior to submitted the subject document for information or approval; and</p> <p>b) Provide details of the consultation undertaking including:</p> <ul style="list-style-type: none"> <li>i) the outcome of that consultation, matters resolved and unresolved; and</li> <li>ii) details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</li> </ul>	
<p>B14(c). an unexpected finds protocol for Aboriginal and non-Aboriginal heritage and associated communication</p>	<p>An unexpected finds protocol for Aboriginal heritage and associated communication has been provided in Section 4.3.2.</p>
<p>B19. The Aboriginal Cultural Heritage Management Sub-Plan (ACHMSP) must address, but not be limited to, the following:</p>	<p>This document</p>
<p>a) be prepared by a suitably qualified and experienced person/s;</p>	<p>This document was prepared by Mikhaila Chaplain, Joel Mason and Dr Alan Williams, archaeologists with EMM Consulting Pty Ltd. See Appendix G.</p>
<p>b) be prepared in consultation with Registered Aboriginal Parties;</p>	<p>Section 2 and Appendix A</p>
<p>c) the recommendations of the Aboriginal cultural heritage assessment report prepared by EMM dated April 2023;</p>	<p>The relevant recommendations in the ACHA have been incorporated in this plan, including the development of the ACHMP, consultation with Aboriginal participants (Section 2), archaeological salvage (Section 4.2) and recovery of cultural materials (Section 4.4), and various reporting requirements (Section 4). Recommendations in relation to heritage interpretation and inclusions of requirements in the Construction Environmental Management Plan are included in their respective documents, rather than this ACHMP.</p>
<p>d) historical archaeological excavations and must be undertaken by suitably qualified and experienced professional, in accordance with the requirements of the Heritage NSW within the Aboriginal sites identified within the Aboriginal Cultural Heritage Assessment prepared by EMM dated April 2023.</p>	<p>This is assumed to relate to the <i>Aboriginal</i> archaeological excavations outlined in EMM's (2023) ACHA focussing on the northeast corner of the Project area. These are presented in Section 4.2.</p>
<p>B26. Prior to the commencement of construction, the Applicant must consult with Registered Aboriginal Parties to determine specific requirements and management measures to be used during construction, including protection of any objects or items in perpetuity.</p>	<p>Sections 2, 4 and Appendix A.</p>
<p>C27. Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by EMM dated April 2023.</p>	<p>The relevant recommendations in the ACHA have been incorporated in this plan, including the development of the ACHMP, consultation with Aboriginal participants (Section 2), archaeological salvage (Section 4.2) and recovery of cultural materials (Section 4.4), and various reporting requirements (Section 4). Recommendations in relation to heritage interpretation and inclusions of requirements in the Construction Environmental Management Plan are included in their respective documents, rather than this ACHMP.</p>
<p>C28. In the even that surface disturbance identifies a new Aboriginal object:</p>	<p>Section 4.3.2</p>
<p>a) all works must halt in the immediate area to prevent any further impacts to the object(s);</p>	

- b) a suitably qualified archaeologist and the registered Aboriginal representative must be contacted to determine the significance of the objects;
- c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcomes for the site included in the information provided to AHIMS;
- d) the Applicant must consult with the Aboriginal community representatives, and the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and
- e) works may only recommence with written approval of the Planning Secretary.

## 1.2 Key stakeholders

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

**Table 1.2 Key stakeholder contact details**

Personnel	Organisation	Role	Telephone contact	E-mail contact
<b>Project team</b>				
Meaghan Bennett*	NSW Department of Education	Project Director	Redacted	Redacted
Anthony Harrigan	The APP Group	Project Manager	Redacted	Redacted
Alan Williams	EMM	Heritage consultant	Redacted	Redacted
Nicole Davis	Heritage NSW	Heritage regulator	Redacted	Redacted
Patrick Andrade	DPE	Planning regulator	Redacted	Redacted
Robert Petersen	Hansen Yuncken	Development contractor	Redacted	Redacted
<b>Registered Aboriginal parties</b>				
Redacted #1	Awabakal Local Aboriginal Lands Council	Aboriginal representative	Redacted	Redacted
Redacted #2	Awabakal Descendants Traditional Owner Aboriginal Corporation	Aboriginal representative	Redacted	Redacted
Redacted #3	Awabakal & Guringai Pty Ltd	Aboriginal representative	Redacted	Redacted
Redacted #4	Lower Hunter Aboriginal Incorporated	Aboriginal representative	Redacted	Redacted
Redacted #5	Didge Ngunawal Clan	Aboriginal representative	Redacted	Redacted





**Table 1.2**      **Key stakeholder contact details**

<b>Personnel</b>	<b>Organisation</b>	<b>Role</b>	<b>Telephone contact</b>	<b>E-mail contact</b>
Redacted #6	Corroboree Aboriginal Corporation	Aboriginal representative	Redacted	Redacted
Redacted #7	Woka Aboriginal Corporation	Aboriginal representative	Redacted	Redacted
Redacted #8	Kamilaroi Yankuntjatjara Working Group	Aboriginal representative	Redacted	Redacted
Redacted #9	A1 Indigenous Services	Aboriginal representative	Redacted	Redacted
Redacted #10	Murra Bidgee Mullangari Aboriginal Corporation	Aboriginal representative	Redacted	Redacted

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

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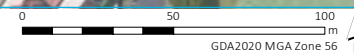


KEY  
 Newcastle High School  
 Where ACHMP applies

Areas to which this ACHMP applies

Newcastle Education Precinct  
Aboriginal Cultural Heritage Management Plan  
Figure 1.1

Source: EMM (2023); DFSI (2021); Metromap (2023)



## 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 artefact collection prior to construction; 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 consultation with RAPs which provided opportunities to review Aboriginal heritage documentation, including the ACHA, and participating in the on-site activities. As part of the ACHA process, a range of feedback around post-approval requirements was provided by the RAPs, and this has been integrated into this document.

### 2.3 Consultation required following the SSDA

Table 2.1 provides the required Aboriginal consultation to be implemented prior to, and during construction activities. Any Aboriginal consultation undertaken as part of these activities 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	A provision of a draft copy of the document to be provided for comment for detailed review, and any other consultation activities sought during initial discussions with the registered Aboriginal parties (eg in-person or online meetings, etc).	3 weeks
	Finalisation of ACHMP	Provision of final report via e-mail and/or post prior to its implementation.	1 week
Pre-construction/ construction	Updates to the ACHMP (as required)	Initial notification via phone/e-mail to 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 (as required)	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
	Archaeological excavations	An archaeological program is proposed in the northeastern/eastern portion of the project area, and for which four 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
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
	Unexpected finds, non-conformance	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

**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 should be re-scheduled to avoid this date.



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

Dates	Activity	Description
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 is 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 SSDA assessment identified two Aboriginal sites within the project area which would both be directly impacted by the proposed works. NEC BS1 includes low significance stone artefacts of low densities across the project area, and NEC AS 1, an artefact scatter of higher densities in the northeastern/eastern corner of the project area which is considered of moderate significance.
- The proposed development would have adverse impacts to NEC BS 1 and NEC AS 1, although portions of the site 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 archaeological excavations in areas of impact across NEC AS 1, and the consideration of an interpretation strategy to incorporate Aboriginal heritage values into the development.

### 3.2 Summary of Aboriginal heritage

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

The desktop information from the broader region indicates that the cultural material, where present, would be primarily in the form of stone artefacts and shell middens. These may be present on the surface or in the upper soil profile (<100 cm below current surface). These would generally be found associated with water resources. Archaeological evidence confirms the Hunter River estuary foreshore was highly utilised by Aboriginal people with reasonable prediction that Aboriginal camp sites would have extended along the original shoreline and into the nearby hinterland.

Targeted archaeological excavations across primarily the northeast and southwest of the project area were undertaken – where development activities are proposed – including 13 test pits on a 10m grid and found 32 stone artefacts in total. Excavations in the southwest was typically heavily disturbed to depths of >80cm, with the northeast corner including historical topsoil above podsol at extended depths of 1.5m below current surface into under-lying dune subsoils. The artefacts discovered were found at the depths of ~50-80cm below the current surface within the under-lying podsol and included primarily of Nobby's Tuff and silcrete raw materials that retained characteristics of use in the late Holocene (<5,000 years ago). Although OSL ages for the soil profile suggest ages of >13 for the assemblage. (Future resolution of this disparity would form part of the future stages). The stone artefacts were found in low densities (<5/m<sup>2</sup>) across the site, with three closely spaced test pits containing most of the assemblage.

### 3.3 Aboriginal sites and/or deposits

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



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

AHIMS #	Site name	Site type	Archaeological significance	Description
-	NEC AS1	Artefact scatter	Moderate	A higher density stone artefact scatter recovering up >20/m <sup>2</sup> found in the northeastern/eastern portion of the project area.
-	NEC BS1	Background scatter	Low	A low-density background scatter found of <5/m <sup>2</sup> found across the project area.



**Plate 3.1** The soil profile encountered within the project area. Artefacts were generally found ~40-80cm below surface.



**Plate 3.2** The soil profile encountered within the project area. Artefacts were generally found ~40-80cm below surface.



**Plate 3.3** An example of a core artefact recovered at NES AS 1. Scale = 1 cm



**Plate 3.4** An example of a conjoin artefact recovered from NES AS 1. Scale = 1 cm

### 3.4 Potential impacts

The project design will adversely affect one artefact scatter site and one background scatter site (Table 3.2, Figure 3.2).

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

<b>AHIMS ID</b>	<b>Site name</b>	<b>Proposed activity causing harm</b>	<b>Degree of harm</b>
-	NEC AS 1	Multi-purpose facility, new sports court, gymnasium	Partial loss of value
-	NEC BS 1	All proposed development activities	Partial loss of value



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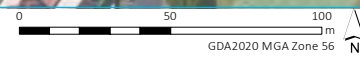


- KEY**
- Newcastle High School
  - Where ACHMP applies
  - Test pit
  - Archaeological resource
  - NEC BS1
  - NEC AS1

Existing archaeological resource for the project area

Newcastle Education Precinct  
Aboriginal Cultural Heritage Management Plan  
Figure 3.1

Source: EMM (2023); DFSI (2021); Metromap (2023)





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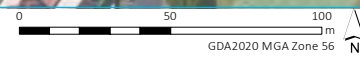


- KEY**
- Newcastle High School
  - Where ACHMP applies
  - Test pit
  - Site layout
  - Archaeological resource
  - NEC AS1
  - NEC BS1

Project impacts to identified Aboriginal heritage

Newcastle Education Precinct  
Aboriginal Cultural Heritage Management Plan  
Figure 3.2

Source: EMM (2023); DFSI (2021); Metromap (2023)



## 4 Mitigation and management

### 4.1 At a glance

- One project specific mitigation measure is required **prior to the construction phase**:
  - Archaeological excavations across NEC AS 1 in the north eastern/eastern corner of the project area to be implemented, as presented in Figure 4.1 and methods outlined in Section 4.2.1 and Appendix D.
- A number of ongoing general post-approval heritage requirements are required **during construction and initial operational phases**. These are outlined in detail in this section and include the need to implement suitable cultural heritage inductions for all on-site personnel, protocols in the event that unexpected cultural materials are found; and processes in the event that areas outside the approved project area require development activities.

### 4.2 Project specific requirements

The ACHA identified 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 Artefact collection

N/A

#### 4.2.2 Archaeological excavation

The NEC AS 1, located in the north eastern corner of the project area, has evidence of cultural deposits (Section 3; Figure 3.1). These deposits were found in test pits 5 and 6(offset) and suggested further cultural materials may be present elsewhere in this part of the site – much of which was inaccessible during the assessment phase due to ongoing school operations. Additional archaeological excavations are required to further characterise, and if required salvage (preservation in record), any cultural materials across this zone.

Figure 4.1 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 this initial test pit location would be dependent on cultural thresholds being met.

The excavations would adopt the methods and requirements outlined in Appendix D, with the following modifications:

- Additional research questions to be considered:
  - Currently the assemblage appears of Holocene (<5,000 years ago) age, while the soil profile appears to date to >13,000 years ago. Can further understanding of the chronology of the cultural assemblage and the soil profile be determined through additional investigations and/or sampling?
  - Can further relationships between the cultural assemblage at NES AS 1 and the broader Newcastle estuary be determined? Is the cultural assemblage being recovered from local sources or suggest a wider movement across the locale?
- In addition to the standard excavation techniques outlined in Appendix D, the following requirements should be met:
  - Geotechnical information indicates that there is significant modern fill and overburden deposits several metres in depth fringing the identified curtilage of NES AS 1, and especially along the



northeastern edge of the project area. Where such fill units are encountered and discerned during the investigative excavations, these and nearby test pits may be discontinued.

- The archaeological team should consist of four archaeologists and four RAPs (including representatives of the Awabakal LALC, Awabakal Descendants Traditional Owner Aboriginal Corporation, Awabakal and Guringai Pty Ltd and Lower Hunter Aboriginal Inc.) 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 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 this area 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 the 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.

EMM in February 2024 has completed the on-site works in accordance to the methodology above. Post excavation analysis and reporting is ongoing at the timing of writing this document.

#### 4.2.3 Cultural monitoring

N/A

#### 4.2.4 Timing

Typically, archaeological mitigations are best undertaken during pre-construction prior to any construction activities that may affect surface and/or shallowly buried cultural materials. 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 excavated and/or removed. Specifically, the following timing must be adopted:

- Pre-construction
  - Archaeological excavation as outlined in Section 4.2 should be undertaken before the main construction program begins and/or prior to any nearby ground disturbance activities during the construction phase.
- Construction
  - N/A



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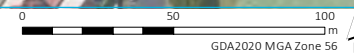


- KEY
- Newcastle High School
  - Proposed test pit
  - Test pit
  - NEC AS1
  - NEC BS1

Archaeological resource

Newcastle Education Precinct  
Aboriginal Cultural Heritage Assessment  
Figure 4.1

Source: EMM (2022); DFSI (2021); Metromap (2022)



## 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 proponent will seek input from RAPs regarding appropriate materials for input and key issues that RAPs would like raised to all inductees. The following points will be conveyed through site induction material:

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

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

### 4.3.2 Unexpected finds protocols

#### i Discovery of Aboriginal artefactual materials

Table 4.1 sets out the measures that will require implementation in the event that any previously unidentified 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 sites 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 e.g. Project Manager, Foreman, Environmental Representative.
  - All construction that could potentially harm the Aboriginal objects or values must cease. 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), Schools Infrastructure NSW Heritage team, and RAPs (see Section 2.3) to lead the subsequent management of the find. Advise Heritage NSW (Table 1.2), and determine their level of involvement in resolving the situation.
  - Consideration of avoidance of the cultural materials will 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 will 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 (Table 1.2). 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:
    - For isolated Aboriginal object (eg stone artefacts, shell fragments, etc) found in disturbed contexts, the site will 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 will be undertaken prior to any further work in the area. Excavations will include an initial investigative phase to characterise the site, followed by a more extensive salvage excavation where significant cultural material is identified. Excavation methods that can be used as a guide are presented in Appendix D.
  - Once the archaeological on-site activities are complete to the satisfaction of the heritage professional in consultation with the RAPs and Heritage NSW, written approval from the Planning Secretary, DPE must be obtained to allow works to resume.
  - All archaeological activities should ensure suitable analysis of any cultural materials, chronological, palaeoenvironmental and sedimentological samples collected are suitably analysed and documented in a report that is provided to Heritage NSW (see Appendix B). This should include submission of the identified cultural materials and findings to the Heritage NSW Aboriginal Heritage Information Management System.
-

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

**Protocols to follow**

---

- All work must **STOP** in the vicinity of the remains. The remains must be left in place and protected from further harm or damage. All construction that could potentially harm the human remains must cease (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 human remains must immediately notify the person in charge of the activity (e.g. Project Manager, Foreman, Environmental Representative).
  - The human remains are to be protected with the establishment of a no-go zone.
  - If the remains are clearly human, contact NSW Police. If the remains are unclear, initially contact the heritage consultant (Section 1.2) and Schools Infrastructure NSW Heritage team to seek initial advice before proceeding with subsequent steps.
  - 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: Newcastle police station – T: (02) 4929 0999.
  - Contact the project heritage consultant (Section 1.2), Schools Infrastructure NSW Heritage team, 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.
  - 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 (e.g. age of individual, how they died, gender, time of burial, etc).
    - If relocation is determined, identify a suitable re-burial location, and ensure the necessary discussions and agreements are in place for the re-burial to occur. Where the RAPs permit, a temporary storage location may be considered while the final location is resolved.
  - Once the on-site activities associated with the human remain are complete to the satisfaction of the heritage professional in consultation with the RAPs, construction activities may continue.
  - Once the agreed management activities are implemented and completed, ensure suitable analysis (as required) of the remains, and formal reporting is developed to be provided to Heritage NSW (Appendix B).
-

### 4.3.3 Changing heritage professional

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

Any handover would include the proponent's facilitation of:

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

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

## 4.4 Management of recovered cultural materials

All recovered cultural material should be curated:

- At the heritage consultant's office for archaeological analysis. The assemblage will be stored in a locked cabinet.
- Once analysis has been completed, the assemblage will be provided to the school for use in on-site interpretation and education opportunities.

## 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 SSIA (i.e. 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; and/or
- if the proposed activity requires a separate approval pathway not permissible as part of the existing SSIA, 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.



## 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 5.3.

#### 5.2.3 Non-conformance

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

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

Any non-conformance will be used in improvement of the ACHMP as outlined in Section 5.3.

## 5.3 Review and improvement

### 5.3.1 Continual improvement

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

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

### 5.3.2 ACHMP review and update

The ACHMP will be revisited and updated in 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 SSIA 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
- 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 will be undertaken in accordance with Section 2.3.

## References

EMM Consulting Pty Limited, 2023, Newcastle Education Precinct. Aboriginal Cultural Heritage Assessment. Unpublished report to Schools Infrastructure NSW

# Abbreviations

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

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# Appendix A

## Aboriginal consultation

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## 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
<hr/>						
<hr/>						

## A.2 Aboriginal feedback

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



## Alan Williams

---

**From:** Georgia Burnett  
**Sent:** Tuesday, 19 December 2023 10:37 AM  
**Cc:** Alan Williams  
**Subject:** Newcastle Education Precinct - Meeting minutes - Wednesday 9 August 2023

Hi all,

Apologies for the delay in distributing these minutes, there was some delay with the project team and we just realized these were never circulated more broadly. If you remember, we held a meeting to discuss the ACHMP for the Newcastle Education Precinct project back in August, please find below some of the key points that were raised and discussed.

Please let me know if we have omitted or forgotten anything, happy to correct where inaccurate.

---

Meeting to discuss proposed Aboriginal Cultural Heritage Management Plan (9 August, Newcastle High School, Hamilton South)

Attendees: Alan Williams and Georgia Burnett (EMM), Anthony Harrington (APP), Redacted #1 (Awabakal Local Aboriginal Land Council), Redacted #2 (Awabakal Descendants Traditional Owners Aboriginal Corporation), Redacted #3 (Awabakal & Guringai Pty Ltd), Redacted #4 (Lower Hunter Aboriginal Incorporated)

Key points and actions:

- AW provided a detailed summary of the works to-date for the proposed Newcastle Education Precinct and proposed Aboriginal Cultural Heritage Management Plan (ACHMP) recommendations, including:
  - Summary of the findings and recommendations of the Newcastle Education Precinct Aboriginal Cultural Heritage Assessment (ACHA), as distributed in the final report in March 2023.
  - Update regarding the OSL dating, as the results having been received after the distribution of the draft report. The dates suggest a very old landscape (11-17ka), re-jigged around or just after the LGM; however, given the characteristics of the assemblage, it is doubtful that the artefacts are of that age, and probably reflect bioturbation downwards through the soil profile. Further investigation of this matter is proposed as part of the ACHMP activities.
  - Provision of map and details of proposed further excavation within NEC AS1 as part of the ACHMP requirements.
  - Some discussion of timing, which remains uncertain while the project is under assessment by Department of Planning and Environment, but probably in very late 2023 or early 2024.

Discussions and outcomes included:

- Discussions around the proposed test excavations, with three key amendments sought and/or determined through the meeting and on-site investigation:

1. Ensuring suitable threshold triggers for the implementation of any required salvage excavations, and ensure these are in line with broader Heritage NSW requirements in locally issued Aboriginal Heritage Impact Permits. (We provide the proposed threshold triggers from the ACHMP below as currently proposed, but happy to explore amendments).
  2. All 1m<sup>2</sup> test pits are dug in quads (i.e. 4 x 0.25m<sup>2</sup> test pits) to provide further information to inform the direction of any salvage excavations if required, and which would be less clear where 1m<sup>2</sup> test pits were undertaken without division. This approach will be added to the ACHMP.
  3. It was noted that some parts of the northeast corner where NEC AS1 is proposed for further works may have substantial fill or overburden deposits from nearby canal works. As such, mechanisms to enable the removal of this fill via mechanical means and/or discontinuance of some of the proposed test pits are to be included in the ACHMP to provide flexibility of management in these areas.
- There was strong support for some form of interpretation and/or education opportunity to be included in the new school based on the archaeological works undertaken and proposed. This included the retention of any recovered artefacts in a display cabinets or equivalent with suitable signage. AH was supportive of this, and would take this idea back to the broader project team for discussion and integration where feasible.

Proposed thresholds for expansion:

*The thresholds for expansion would include:*

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

Happy to discuss.

**Georgia Burnett**

Senior Archaeologist



T Redacted  
M Redacted  
LI [Connect on LinkedIn](#)  
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**From:** [Alan Williams](#)  
**To:** [Alan Williams](#)  
**CC:** [George Barrett](#)  
**Subject:** Newcastle Education Campus - ACH - project update - December 2023  
**Date:** Tuesday, 19 December 2023 10:28:41 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

Hi All,

This is just a brief email to let you know that the project approval for the [Newcastle Education Campus](#), 25a National Park Street, Newcastle West, is expected in the coming days – potentially prior to Christmas. The conditions for this project are expected to align with the recommendations in EMM's Aboriginal cultural heritage assessment (can be found [here](#)), and which recommends the development of a management plan to provide direction on post-approval archaeological mitigation activities. The focus of these activities is further archaeological excavation in the northeastern/eastern corner of the site where cultural materials were previously encountered, as well as cultural inductions and unexpected find protocols, etc.

At this stage, we are aiming for the management plan to be distributed early in the new year for your review, inputs and comments, with any on-site works likely beginning in late January 2024 (probably the 29<sup>th</sup>). There are still a few steps for this to happen, but just wanted to keep you informed since I know many will be taking leave over the Christmas break and may not be back much before this date.

Happy to discuss

Thanks

A

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

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



**Associate Investigator**  
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Sydney, NSW 2052

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School of Biological, Earth and Environmental Sciences  
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**Industry Fellow**  
Institute of Sustainable Futures  
University Technology Sydney  
Ultimo, NSW 2007



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**From:** [Amber Morgan](#)  
**To:** [Amber Morgan](#)  
**Cc:** [Joel Mason](#); [Rohani Dutch](#); [Samuel Elias](#)  
**Subject:** Re: Newcastle Education Campus - ACHMP excavations Invitation  
**Date:** Friday, 9 February 2024 12:22:30 PM  
**Attachments:** [Outlook-A picture .png](#)  
[Outlook-https\\_\\_\\_do.png](#)  
[Outlook-A picture .png](#)

---

Hi all,

This is just a reminder for the upcoming excavations at Newcastle High School commencing next week (12th - 16th Feb).

The team will be meeting at the front office of Newcastle High School (160/200 Parkway Avenue, Hamilton South) at **8am** on Monday morning.

The field team will be lead by Joel Mason (04 0608 2179) with assistance from Rohani (0459 353 013) and Samuel (0431 029 429). If you have any issues please don't hesitate to call one of them.

Thank you and kind regards,

**Amber Morgan**

Graduate Archaeologist

**T** Redacted

**M** Redacted

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

---

**From:** Amber Morgan <amorgan@emmconsulting.com.au>

**Sent:** Friday, 2 February 2024 10:04 AM

**To:** Amber Morgan <amorgan@emmconsulting.com.au>

**Cc:** Georgia Burnett <gburnett@emmconsulting.com.au>; Joel Mason <jmason@emmconsulting.com.au>; Alan Williams <awilliams@emmconsulting.com.au>; Laressa Barry <lbarry@emmconsulting.com.au>

**Subject:** Re: Newcastle Education Campus - ACHMP excavations Invitation

Hi All,

Apologies again for having to postpone the fieldwork for this week but we can now confirm new dates.

Fieldwork will be commencing on **Monday 12th February**.

We are seeking one sites officer from your organisation for up to 5 days between 12th - 16th February 2024. Please let us know if you can still attend.

All the information you may need can be found in the invitation email, attached below, but if you have any questions please reach out.

We will be meeting at the front office of Newcastle High School (160/200 Parkway Avenue, Hamilton South) at **8am** on Monday morning.

Kind regards,

## Amber Morgan

Graduate Archaeologist

**T** Redacted

**M** Redacted

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

---

**From:** Amber Morgan <amorgan@emmconsulting.com.au>

**Sent:** Thursday, 25 January 2024 4:55 PM

**To:** Amber Morgan <amorgan@emmconsulting.com.au>

**Cc:** Georgia Burnett <gburnett@emmconsulting.com.au>; Joel Mason <jmason@emmconsulting.com.au>; Alan Williams <awilliams@emmconsulting.com.au>

**Subject:** Re: Newcastle Education Campus - ACHMP excavations Invitation

Hi All,

Sorry for the late notice but we have had to cancel the for fieldwork next week.

Apologies for any inconvenience this has caused but we will let you know as soon as possible when new dates have been organised.

Kind regards,

## Amber Morgan

Graduate Archaeologist | Ecology & Heritage

**T** Redacted

**LI** [Connect on LinkedIn](#)

**SYDNEY | Gamaraigal Country, Ground floor, 20 Chandos Street, St Leonards NSW 2065**  
[emmconsulting.com.au](http://emmconsulting.com.au)

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---

**From:** Amber Morgan

**Sent:** Monday, January 15, 2024 1:50:24 PM

**To:** reception@awabakallalc.com.au <reception@awabakallalc.com.au>; lowerhunterai@gmail.com <lowerhunterai@gmail.com>; tracey@guringai.com.au <tracey@guringai.com.au>; awabakal.to@gmail.com <awabakal.to@gmail.com>

**Cc:** Georgia Burnett <gburnett@emmconsulting.com.au>; Joel Mason <jmason@emmconsulting.com.au>; Alan Williams <awilliams@emmconsulting.com.au>

**Subject:** Newcastle Education Campus - ACHMP excavations Invitation

Dear all,

Thank you for your ongoing involvement to date in the Aboriginal heritage assessment for the proposed redevelopment of the Newcastle Education Campus. As you will know, the ACHMP for this project was distributed in Dec 23 for your review, and included some further investigation within the sandy deposits (NEC AS1) in the northeastern/eastern corner of the site; as noted in that communication, we are looking to implement the plan fairly shortly after the comment period closes and as such, we would like to invite your group to participate in the excavations scheduled for **Monday 29 January 2024**. This email details



the upcoming excavations and what we need from you.

Please find below some of the logistics for the fieldwork:

1. We are seeking one sites officer from your organisation for 5 days between **Monday 29 January and Friday 2 February 2024.**
2. Initial meeting place – front of Newcastle High School (160/200 Parkway Avenue, Hamilton South) as we will need to check in with the school office, time TBC but likely 7am or 8am.
3. These works are being undertaken by Joel Mason (0406 082 179) and assisted by Amber Morgan (0417876189).
4. Alan Williams will be your main contact for any broader project issues – 0438 104 740.

### **Insurances and contracts**

Appropriate insurance coverage (workers compensation, public liability insurance) must be provided by all applicants prior to fieldwork. Even if you have provided this previously to EMM for other projects, we will need new contracts and updated insurances for auditing purposes. If your organisation does not require these insurances, please provide a written statement from WorkCover or your insurance provider acknowledging your insurance status and the reasons why this occurs. If you do not have these documents and are unable to obtain them, please let us know and we can help arrange a solution via a third party provider.

Prior to the commencement of fieldwork, please ensure we have received your:

- Signed conditions of engagement form (attached);
- Your organisation's workers compensation, personal accident insurance (or equivalent);
- Public liability; and,
- Professional indemnity (not required but desirable).

If we do not receive them, I am afraid your involvement in that phase of fieldwork will be discontinued until resolved.

### **Requirements and details (work scope)**

We are seeking one sites officer from your organisation for up to 5 days between 29 January - 2 February 2024. Please note that there is potential for the program to run shorter due to the findings. The works will include the assistance in the archaeological excavation program, including manual digging, moving of buckets, sieving, manual labour, and work with EMM archaeologists to document them for our reporting requirements.

We are authorised to pay up to **\$130 ex GST per hour** for this representative for a period of up to 8 hours per day of attendance. Please provide an invoice to Alan Williams at EMM with the title 'Newcastle Education Campus ACHMP excavations' and we will submit it for processing. Typically, we pay within three weeks of receipt of invoice but payments can take up to 60 days to run through our system. Invoices require the following: your registered business name, address, and ABN; GST breakdown if relevant; details of the persons and dates involved; and, electronic banking details.

Please note:

- If you are unwell and/or unable to attend site, please let EMM know the night before or before 7am in the morning on the day to discuss.
- Please ensure your sites officer has all necessary safety gear (steel toecaps, hi-vis, long sleeves/pants, rain jacket, sun hat, safety glasses/sunglasses) for a day in the field. Please bring wet weather gear in case we do get some rain while on site.
- Please bring lots of food and water for yourself for the day.

## **Code of Conduct**

Professional code of conduct is expected at all times from all participants. Harassment or other inappropriate behaviour is not acceptable. Common courtesy towards all team members and in particular, to those providing site access, is expected.

Any person who behaves in a manner that is abusive, threatening or humiliating towards other members of the field team or other parties (eg school staff) will be asked to leave immediately. While your organisation may continue to be invited to participate, the individual in question would not be permitted to attend for the remainder of the field program. This will be further emphasised in our on site safety documentation.

Happy to discuss.

Thank you,

Amber

### **Amber Morgan**

Graduate Archaeologist | Ecology and Heritage



**T** Redacted  
**M** Redacted  
**LI** [Connect on LinkedIn](#)  
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**SYDNEY | Gamarraigal Country, Ground floor, 20 Chandos Street, St Leonards NSW 2065**



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# Appendix B

## Legislation and obligations

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## B.1 Obligation to protect Aboriginal cultural heritage

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

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

- An Aboriginal object is defined as: *Any deposit, object or material evidence (not being a handicraft made for sale) relating to the Aboriginal habitation of the area that comprises New South Wales, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction and includes Aboriginal remains.*
- An Aboriginal place is: *any place declared to be an Aboriginal place under section 84.* This is a very specific piece of legislation that provides process and management of Aboriginal sites of cultural, but not necessarily scientific, values. They are commonly, but not always associated with intangible values.
- any place declared to be an Aboriginal place by the Minister for the Environment, under Section 84 of the Act.

### B.1.2 Obligation to avoid harm

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

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

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

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

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

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

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

#### B.1.4 Statutory reporting requirements

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

#### B.1.5 Discovery of Aboriginal objects

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

#### B.1.6 Care agreements

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

Care Agreement application forms can be downloaded at:

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

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

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

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

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

Aboriginal Site Impact Recording Forms can be downloaded at:

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



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# Appendix C

## Aboriginal site descriptions

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## C.1 Site definitions

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

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

Site feature	Definition and recording methods
Aboriginal ceremony and Dreaming	Previously referred to as mythological sites these are spiritual/story places where no physical evidence of previous use of the place may occur; e.g. 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; e.g. 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 (i.e. seed grinding) were implemented.
Habitation structure	Structures constructed by Aboriginal people for short- or long-term shelter. More temporary structures are commonly preserved away from the NSW coastline, may include historic camps of contemporary significance. Smaller structures may make use of natural materials such as branches, logs and bark sheets or manufactured materials such as corrugated iron to form shelters. Archaeological remains of a former structure such as chimney/fireplace, raised earth building platform, excavated pits, rubble mounds etc.
Modified tree (carved or scarred)	Trees which show the marks of modification as a result of cutting of bark from the trunk for use in the production of shields, canoes, boomerangs, burials shrouds, for medicinal purposes, foot holds etc., or alternately intentional carving of the heartwood of the tree to form a permanent marker to indicate ceremonial use/significance of a nearby area, again these carvings may also act as territorial or burial markers.
Potential archaeological deposit (PAD)	An area where Aboriginal objects may occur below the ground surface. The term 'potential archaeological deposit' was first applied in Sydney regional archaeology in the 1980s and referred to rockshelters that were large enough and contained enough accumulated deposit to allow archaeologists to predict that subsurface cultural material was likely to be present. Since then, the term has come to include open sites where the same prediction can be made. Unless previously identified, it is considered unlikely that a PAD would be classified through an unexpected finds process.
Shell	An accumulation or deposit of shellfish from beach, estuarine, lacustrine or riverine species resulting from Aboriginal gathering or consumption. Usually found in deposits previously referred to as shell middens. Must be found in association with other objects like stone tools, fish bones, charcoal, fireplaces/hearths, and burials. Will vary greatly in size and composition.

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

<b>Site feature</b>	<b>Definition and recording methods</b>
Stone quarry	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.

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# Appendix D

## Archaeological excavation methods

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## D.1 Excavation methods

The following section outlines a standard excavation methodology that can be adopted in the case of additional required archaeological excavations (Section 4.2.2) and any unexpected finds procedures (Section 4.3.3). 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 will the cultural materials be conserved and managed in future?

### D.1.2 Investigative phase

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

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

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

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

### D.1.3 Thresholds for further excavation

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

The thresholds for expansion would include:

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



#### D.1.4 Salvage excavations

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

The following methods would be adopted for all salvage excavations:

- Excavation:
  - Establishment of open area excavation area/s using a using a hand-held Leica RTK CS10/GS08 survey grade Differential GPS device (or equivalent).
  - All test pits would be dug manually using shovels, mattocks, trowels and other hand tools as required. Excavation would be undertaken as 1 m<sup>2</sup>. Each square would be given an alpha-numeric label for identification purposes.
  - All excavation would be undertaken in 5 cm spits to the depth of 100 cm below surface, which has been shown as culturally sterile (EMM 2023). Depths of excavation would be adjusted as necessary based on the findings of the investigative phase.
  - All sediment would be placed in buckets, labelled according to its assigned test pit number and spit, and recorded and documented. All sediment would then be wet-sieved through a 5 mm wire aperture mesh, and any historic and/or Aboriginal cultural material recovered, labelled and bagged for subsequent analysis and curation.
- Field Documentation:
  - All excavations would be documented using photographic records, written descriptions and scaled drawings.
  - Soil profiles would be recorded in accordance with the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (DECCW 2010), including scaled drawings, photographs, and written descriptions.
  - Soil samples would be collected for description, sedimentological and chronological analysis where such analysis is considered likely to contribute significant information. Optically Stimulated Luminescence (OSL) samples would be taken in areas where Aboriginal objects are found, and generally try to bracket the deposit (to provide a maximum and minimum age). Material for radiocarbon analysis may also be undertaken opportunistically if archaeological features containing charcoal or other dateable material are evident.
  - Reduced levels of the top and bottom of the test pit, and at the top of each fourth spit would be documented using a dumpy level against a known elevation. Other levels may be taken as required.
- Excavation procedures and protocols may be modified at the discretion of the Excavation Director, in consultation with the RAPs and proponent as the conditions in the field and nature of the excavations develop. This includes the movement/discontinuance of test pits to avoid existing obstacles, buried services and disturbances.

### D.1.5 Post excavation analysis and reporting

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

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

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# Appendix E

## Complaints register

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# Appendix F

## Document control

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**Table F.1 Document revisions**

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

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# Appendix G

## Qualified Personal Curriculum Vitae

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## Dr Alan Williams FSA FRSA MAACAI MEIANZ

Associate Director | Technical Lead – Aboriginal Heritage  
EMM Consulting Pty Limited

### Professional Overview

Alan is one of the leading archaeological consultants in Australia, having undertaken work in every Australian State and Territory. Alan has 20 years' experience in cultural heritage management (CHM), specialising in Aboriginal heritage, has acted in a range of public and private sector roles, and worked for clients in the government, residential, mining, energy, transport and infrastructure sectors. He has mentored ~20 archaeologists, managed some \$25million of CHM projects encompassing ~450 projects, and has produced 200+ reports on archaeological sites (and associated developments). He routinely supervises large-scale archaeological excavations and is frequently sought out to troubleshoot complex and/or controversial projects.

He is also well established in academia, affiliated with multiple universities, and widely published on past Aboriginal demography, palaeoclimatology and other key archaeological debates.

### Qualifications and licences

Doctor of Philosophy, The Australian National University, Canberra ACT, 2015

Master of Science, Quaternary Science, Royal Holloway University of London, 2001

Bachelor of Science (Hons) Joint Geography and Archaeology, University of Leicester, 1999

### Professional memberships

Industry Fellow, Centre for Sustainable Futures, University Technology Sydney

Associate Investigator, ARC Centre of Excellence for Australian Biodiversity and Heritage, University of New South Wales

Adjunct Senior Lecturer – School of Biological, Earth and Environmental Sciences, University of New South Wales

Full member and Membership Committee Member, Association of Australian Consulting Archaeologists

Member, Environmental Institute of Australia and New Zealand

Editorial Advisory Committee Member, Australian Archaeology (- 2021)

Fellow, Society of Antiquaries of London

Fellow, Royal Society of Arts

### Specialisation

Cultural heritage management

Aboriginal heritage

### Representative experience

- Central West Orana REZ transmission project – Aboriginal Heritage Lead - Aboriginal heritage assessment, field investigations (including test excavations), Aboriginal stakeholder and consent authority liaison, cultural values mapping (WSP, EnergyCo).
- Oven Mountain Pumped Hydro Storage – Aboriginal Heritage Lead - Aboriginal heritage assessment, field investigations (including test excavations), Aboriginal stakeholder and consent authority liaison, cultural values mapping, (OMPS Pty Ltd/Alinta Energy).
- Muswellbrook Solar Farm – Aboriginal Heritage Lead - Aboriginal heritage assessment, field investigations (including test excavations), Aboriginal stakeholder and consent authority liaison (ESCO Pacific).
- Greater Penrith – Eastern Creek Place Strategy – Aboriginal Heritage Lead – Aboriginal heritage desktop and predictive modelling, cultural values mapping, policy and guidance on future development (Department of Planning, Industry and Environment).
- Dungowan Dam project – Aboriginal Heritage Lead - Aboriginal heritage assessment, field investigations (including test excavations), Aboriginal stakeholder and consent authority liaison, cultural values mapping, Aboriginal heritage approvals (Water NSW).
- Mole River Dam project – Aboriginal Heritage Lead - Aboriginal heritage assessment, field investigations (including test excavations), Aboriginal stakeholder and consent authority liaison, cultural values mapping, Aboriginal heritage approvals (Water NSW).
- Wyangala, Dungowan and Mole River Dam projects – Aboriginal Heritage Lead – Aboriginal heritage inputs into scoping report, engagement and communication strategy (Water NSW).
- Wollar preliminary regional investigation area – Aboriginal Heritage Lead – Aboriginal heritage review, predictive modelling, heritage risk identification (NSW DPIE).
- Burrawang to Avon Tunnel project – Aboriginal Heritage Lead – Route selection advice, Aboriginal heritage assessment, field investigations, Aboriginal stakeholder and consent authority liaison, Aboriginal heritage approvals (Water NSW).
- Moomba to Wilton gas pipeline (various activities) – Aboriginal Heritage Lead – Aboriginal stakeholder and consent authority liaison, Aboriginal heritage approvals (APA Group).
- Lake Cowal gold operations – Aboriginal Heritage Lead - Aboriginal heritage post-approval tasks, including test and salvage excavations, interpretation, Aboriginal stakeholder and consent authority liaison (Evolution Mining).
- Mamre Road Place Strategy – Aboriginal Heritage Lead – Aboriginal heritage assessment, field investigations, Aboriginal stakeholder and consent authority liaison, Aboriginal heritage approvals (Department of Planning, Industry and Environment).
- New Cobar complex mine – Aboriginal Heritage Lead – Aboriginal heritage assessment, field investigations, Aboriginal stakeholder and consent authority liaison, Aboriginal heritage approvals (Aurelia Metals).

- Limondale Solar Farm, Balranald – Aboriginal Heritage Technical Advisor – advice and management of human remains, Aboriginal consultation (Belectric).
- Far North Coast Schools – Aboriginal Heritage Lead – Aboriginal heritage assessment, field investigations, Aboriginal stakeholder and consent authority liaison, Aboriginal heritage approvals (Schools Infrastructure NSW).
- New England Solar Farm – Aboriginal Heritage Technical Advisor - Aboriginal heritage post-approval tasks, including on-site mitigation, strategy and QA review (UPC Renewables).
- Lake Cowal gold operations – Aboriginal Heritage Lead - Aboriginal heritage post-approval tasks, including test and salvage excavations, interpretation, Aboriginal stakeholder and consent authority liaison (Evolution Mining).
- HVO Continuation – Aboriginal Heritage Technical Advisor - Aboriginal heritage assessment, field investigations (including test excavations), Aboriginal stakeholder and consent authority liaison, Aboriginal heritage approvals. (Glencore).
- Narran-Warrambool Reserve – Aboriginal Heritage Lead – development of framework reference document to inform future development activities across LGA (Department of Resources).
- Charles Street and Ferry Wharf landscape upgrades – Aboriginal Heritage Lead – Aboriginal heritage field investigations, Aboriginal stakeholder and consent authority liaison, Aboriginal heritage approvals (City of Parramatta Council).
- Windsor Bridge Replacement Project (NSW) – Aboriginal Heritage Lead – Aboriginal heritage post-approval tasks, including test and salvage excavations, interpretation, Aboriginal stakeholder and consent authority liaison (Transport for NSW).
- Moorebank Intermodal Terminal, Moorebank – Aboriginal Heritage Lead – Aboriginal heritage assessment, field investigations (test excavation), Aboriginal stakeholder and consent authority liaison, and post-approval mitigation (management plan, salvage excavations). (SIMTA and CPB Contractors).
- Granville Multi-Purpose Centre – Aboriginal Heritage Lead – Aboriginal heritage assessment, field investigations, Aboriginal stakeholder and consent authority liaison, Aboriginal heritage approvals (Cumberland City Council).
- Robin Thomas Reserve, Parramatta – Aboriginal Heritage Lead – Aboriginal stakeholder and consent authority liaison, Aboriginal heritage approvals (Transport for NSW).
- Ammaroo Phosphate Project, Ammaroo (NT) – Aboriginal Heritage Lead – Aboriginal heritage assessment, field investigations, Aboriginal stakeholder and consent authority liaison (Verdant Minerals).
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# Mikhaila Chaplin

Archaeologist

EMM Consulting Pty Limited

## Professional Overview

Mikhaila is an Archaeologist with over four years of assessment and fieldwork experience in NSW, Tasmania and overseas. She has been responsible for Aboriginal community engagement and the preparation of built heritage, historical and Aboriginal archaeological assessments for a range of small-scale Development Applications and State Significant Development projects NSW.

## Qualifications and licences

Bachelor of Arts (Archaeology and Ancient History), University of Sydney, 2018

Work Health and Safety General Construction Induction Card

Rail Industry Worker Card

Working with children check

First Aid Training

## Specialisation

Identification, assessment and management of Aboriginal cultural heritage sites

Aboriginal community engagement

Archaeological excavation

## Representative experience

- Tabbita Channel feasibility study, due diligence assessment, Tabbita, NSW (Murrumbidgee Irrigation)
- Cumberland High School, Aboriginal community engagement, archaeological excavation, Carlingford, NSW (Schools Infrastructure NSW)
- Harbourside, historical archaeological excavation, Darling Harbour, NSW (Mirvac)
- Chief Mechanical Engineers Building, conservation management plan, Eveleigh, NSW (Transport for NSW)
- Large Erecting Shop SSDA, Aboriginal community engagement, Aboriginal cultural heritage assessment, historical archaeological assessment, Eveleigh, NSW (TAHE)
- The Sandstone Precinct, historical archaeological excavation and monitoring, Circular Quay, NSW (Essence Project Management on behalf of Pontiac Land Group)
- Longs Lane, heritage impact statements, archaeological excavation and monitoring, The Rocks, NSW (NashCap)
- Large Erecting Shop Planning Proposal, Aboriginal community engagement, Aboriginal cultural heritage study & statement of impact, non-Aboriginal heritage study, Eveleigh, NSW (TAHE)
- 388 Sussex Street, heritage impact assessment, historical archaeological assessment, Haymarket, NSW (Taurus Aurum Pty Ltd)
- 131 Henry Street, Aboriginal community engagement, due diligence assessment, Aboriginal cultural heritage assessment and methodology, historical archaeological assessment, Penrith, NSW (Penrith City Council)
- North Head fence, road and lookout upgrades, heritage impact statement, North Head, NSW (National Parks and Wildlife Services)
- 44-78 Rosehill St, Aboriginal community engagement, due diligence assessment, Aboriginal cultural heritage assessment, historical archaeological assessment, Redfern, NSW (Kippax Property)
- Redfern North Eveleigh Precinct Renewal, non-Aboriginal heritage study, Eveleigh, NSW (Transport for NSW)
- 38-42 Pirrama Rd, Aboriginal community engagement, due diligence assessment, Aboriginal cultural heritage assessment, AHIP application, archaeological excavation and post excavation archaeological assessment, Pyrmont, NSW (Google)
- 502-514 Elizabeth St and 272-276 Cleveland St, Aboriginal community engagement, Aboriginal archaeological technical reports, Surry Hills, NSW (Podia on behalf of AIDOP No 7 Pty Ltd)
- Ultimo Powerhouse Stage 1 SSDA, Aboriginal community engagement, due diligence assessment, historical archaeological assessment, Ultimo, NSW (Create NSW)
- Locomotive Workshops, archaeological excavation, moveable heritage, Eveleigh, NSW (Mirvac)
- Clarence Correctional Centre Transmission Line, lithic analysis, Clarence Valley, NSW (Infrastructure NSW)
- 20 Waterview St, archaeological excavation and lithic analysis, Putney, NSW (Lilac Pty Ltd/Divas Group)
- Devonshire Street Cemetery, historical archaeological excavation, Sydney Central Station, NSW (Transport for NSW)
- Parramatta Light Rail, archaeological excavation, Parramatta, NSW (Transport for NSW)





## Joel Mason

Historical Archaeologist  
EMM Consulting Pty Limited

### Professional Overview

Joel Mason is an accomplished Historical Heritage Archaeologist who holds a Master's degree in Archaeological Science from the ANU, where he specialised in geoarchaeology and GIS. For the past five years, Joel has been a consultant in both Aboriginal and historical archaeology across Australia. Joel has extensive experience including project planning, pre-fieldwork logistics, surveying, excavation, and post-fieldwork reporting. Joel also has overseas experience as a Field Director in excavations in Tarquina, Italy and Bribir, Croatia, where he managed projects and archived material.

Joel also specialises in GIS and digital applications in archaeology and has experience in complex datasets and visualisation.

### Qualifications and licences

Master of Archaeological Science (Advanced), Australian National University, 2020

Bachelor of Ancient History, Macquarie University, 2016  
Canberra Archaeology Society

Australian Society for Historical Archaeology

Australian Archaeological Association

Archaeology Bioanthropology Anthropology Cultural Heritage and Museum Studies

### Specialisation

Historical Heritage

Aboriginal Heritage

Geoarchaeology

GIS

Project planning and pre-fieldwork logistics

Surveying and excavation

### Representative experience

- Seaham Quarry Project, Statement of Heritage Impact, Seaham NSW (Boral Australia Pty Ltd)
- 924 Hunter Street Newcastle, Excavation Report, Newcastle (Thirdi Dairy Farmers Pty Ltd)
- Luddenham Road 132kV Feeder Installation, Excavation Report and
- Oven Mountain Pumped Hydro Energy Storage, Statement of Heritage Impact, Oven Mountain NSW (OMPS Pty Ltd)
- Sandy Creek Solar Farm, Statement of Heritage Impact, Dunedoo NSW (Lightsource BP Pty Ltd)
- General John Baker Complex Redevelopment, Aboriginal cultural heritage assessment and archaeological excavation, Bungendore NSW (Defence)
- Victoria Barracks Gate Installation, Historic Impact Assessment, Paddington NSW (Defence)
- Rose Valley Environmental Impact Statement, Statement of Heritage Impacts, Rose Valley NSW (Schottlanders Wagyu)
- HMAS Watson Chapel Rejuvenation Project, Heritage Impact Assessment, South Head NSW (Defence)
- Randwick Barracks Roof Installation Project, Heritage Impact Assessment, Randwick NSW (Defence)

### Publications

- Mason, J. Denham, T. Lin, E. Grono, E. (2022) QEMSCAN® analysis of clay-rich stratigraphy associated with early agricultural contexts at Kuk Swamp, Papua New Guinea. *Journal of Archaeological Science: Reports*.

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