

# Aboriginal Heritage Due Diligence Assessment

FROGS HOLLOW RECREATIONAL FLYING SCHOOL



APRIL 2018



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## ACRONYMS AND ABBREVIATIONS

AHIMS	Aboriginal heritage information management system
AHIP	Aboriginal Heritage Impact Permit
Km	kilometres
LALC	Local Aboriginal Land Council
M	Metres
NPW Act	<i>National Parks And Wildlife Act 1974 (NSW)</i>
NSW	New South Wales
OEH	(NSW) Office of Environment and Heritage, formerly Department of Environment, Climate Change and Water
PAD	Potential Archaeological Deposit

## EXECUTIVE SUMMARY

NGH Environmental was commissioned by Sports Aviation Flight College Australia Limited (SAFCA) to undertake a Due Diligence assessment for Aboriginal heritage sites for the proposed Recreational Flight School at Frogs Hollow.

The subject land is Lot 1 DP 109606 and Lot 1 DP245789, 1070 Princes Highway, Frogs Hollow, approximately 10 km south west of Bega in the Bega Valley LGA.

## BACKGROUND ASSESSMENT

No AHIMS sites have been currently recorded within the proposed project area. There were 96 Aboriginal sites recorded within this search area and no declared Aboriginal Places (Table 1).

## FIELD ASSESSMENT

The field inspection of the assessment area identified no Aboriginal cultural material, but encountered poor surface visibility. There are topographic elements present in the study area, and that would be disturbed by the proposed development that have moderate to high archaeological potential.

## IMPACT ASSESSMENT CONCLUSION

The field assessment of this site confirmed the desktop assessment observations that the area is a broad, ridge crest flanked by permanent water sources to the east and west. The same topography that makes the location useful for aircraft take-off and landing, namely a gentle plateau sited within more dissected country, would indicate a higher archaeological potential than the immediate surrounds. Poor surface visibility hampered the field assessment of the project area, and as such this study did not locate any Aboriginal objects but identified the potential of the development to disturb Aboriginal objects which are likely to be within the deposits. As a consequence, development proposed for the crest and upper slopes of the ridge crest would warrant further assessment in the form of test excavation. This would also be applicable to any works on the runway surface itself (not currently planned).

## RECOMMENDATIONS

1. The proponent should undertake an Aboriginal Cultural Heritage Assessment of the proposed flight training facility with a view to undertaking test excavation in the development footprint.
2. Test excavation could be undertaken under the NSW Code of Practice for Archaeological Investigation, following completion of Aboriginal community consultation procedures specific in the NSW OEH Guidelines for Aboriginal Community Consultation for Proponents.
3. Test excavation should sample a range of topography with close reference to proposed high impact development footprint (hangars, accommodation, boundary track).
4. A copy of this report should be supplied to the Bega LALC for their records.

SAFCA is reminded that it is an offence under the *National Parks and Wildlife Act (NSW) 1974* (as amended) to disturb, damage or destroy an Aboriginal object without a valid Aboriginal Heritage Impact Permit.

# 1 INTRODUCTION

NGH Environmental was commissioned by Sports Aviation Flight College Australia Limited (SAFCA) to undertake a Due Diligence assessment for Aboriginal heritage sites for the proposed Recreational Flight School at Frogs Hollow.

The subject land is Lot 1 DP 109606 and Lot 1 DP245789, 1070 Princes Highway, Frogs Hollow, approximately 10 km south west of Bega in the Bega Valley LGA.

The proposal involves the establishment of Sports Aviation Flight College Australia that specifically responds to the growing need for recreational flight training in China. The proposed development would provide packages to students that includes accommodation, meals, tuition and flight training. The development would therefore include the construction of a main building, two workshop buildings, ten hanger buildings, ten squadron compounds, one undercover carpark, internal access roads and upgrade of the intersection between the Princes Highway and the existing access road, bridge construction, several water storage tanks and fuel storage tanks.

This assessment follows on and is consistent with the comments made by OEH in regard to the Development application for the proposal and will form part of the Statement of Environmental Effects undertaken by NGH Environmental.

## 1.1 PROJECT PARTICIPANTS

The Due Diligence assessment was carried out by qualified archaeologists Emily Dillon of NGH Environmental and Doug Williams of Access Archaeology & Heritage Pty Ltd. This included background research, field inspection and the completion of this report.

The due diligence process does not formally require consultation with Aboriginal community groups. The proposal area is within the boundaries of the Bega Local Aboriginal Land Council.

The representative Ron Thomas from the Bega LALC participated in this survey. The report will be provided to the LALC for their records

## 1.2 FORMAT OF THIS REPORT

This report has been drafted in keeping with the sequence of steps identified in the NSW Office of Environment and Heritage's *Due Diligence Code of Practice for the Protection of Aboriginal Objects in NSW* (OEH 2010). The Code of Practice provides a five step approach to determine if an activity is likely to cause harm to an Aboriginal object, as defined by the *NSW National Parks and Wildlife Act (1974)*. The steps follow a logical sequence of questions, the answer to each question determines the need for the next step in the process.

The progress through the steps in the Code of Practice is aimed at providing an assessment of the potential for an activity to impact either a known Aboriginal object, or whether it is likely that unrecorded Aboriginal objects are present that may be impacted. The result of the process is aimed at providing the proponent with information about the likelihood that their activity will impact an Aboriginal object and whether an Aboriginal Heritage Impact Permit may be required.

Each section below follows the relevant step outlined in the Code of Practice.



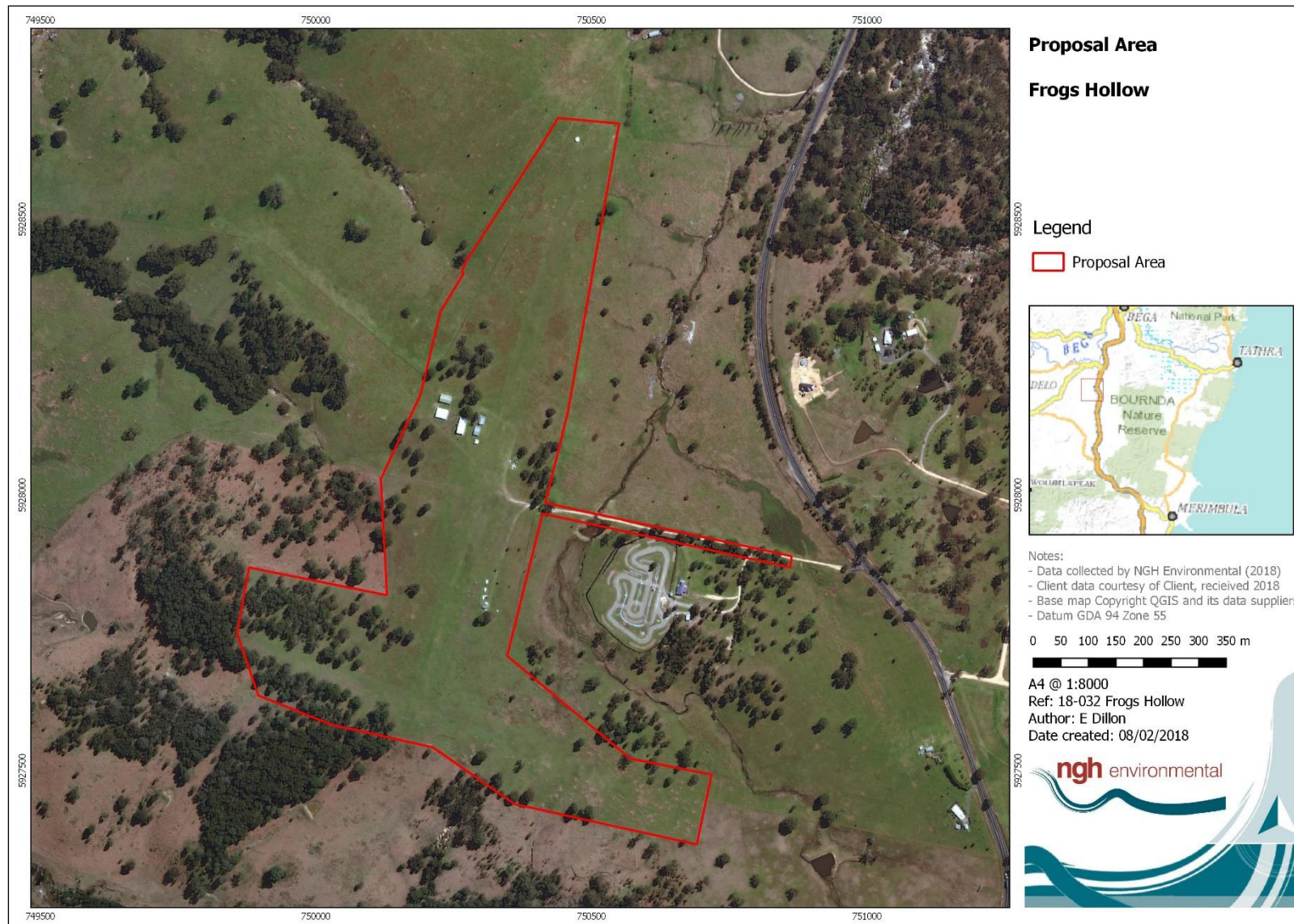


Figure 1 General project location and proposal area of the Frogs Hollow Recreational Flight School



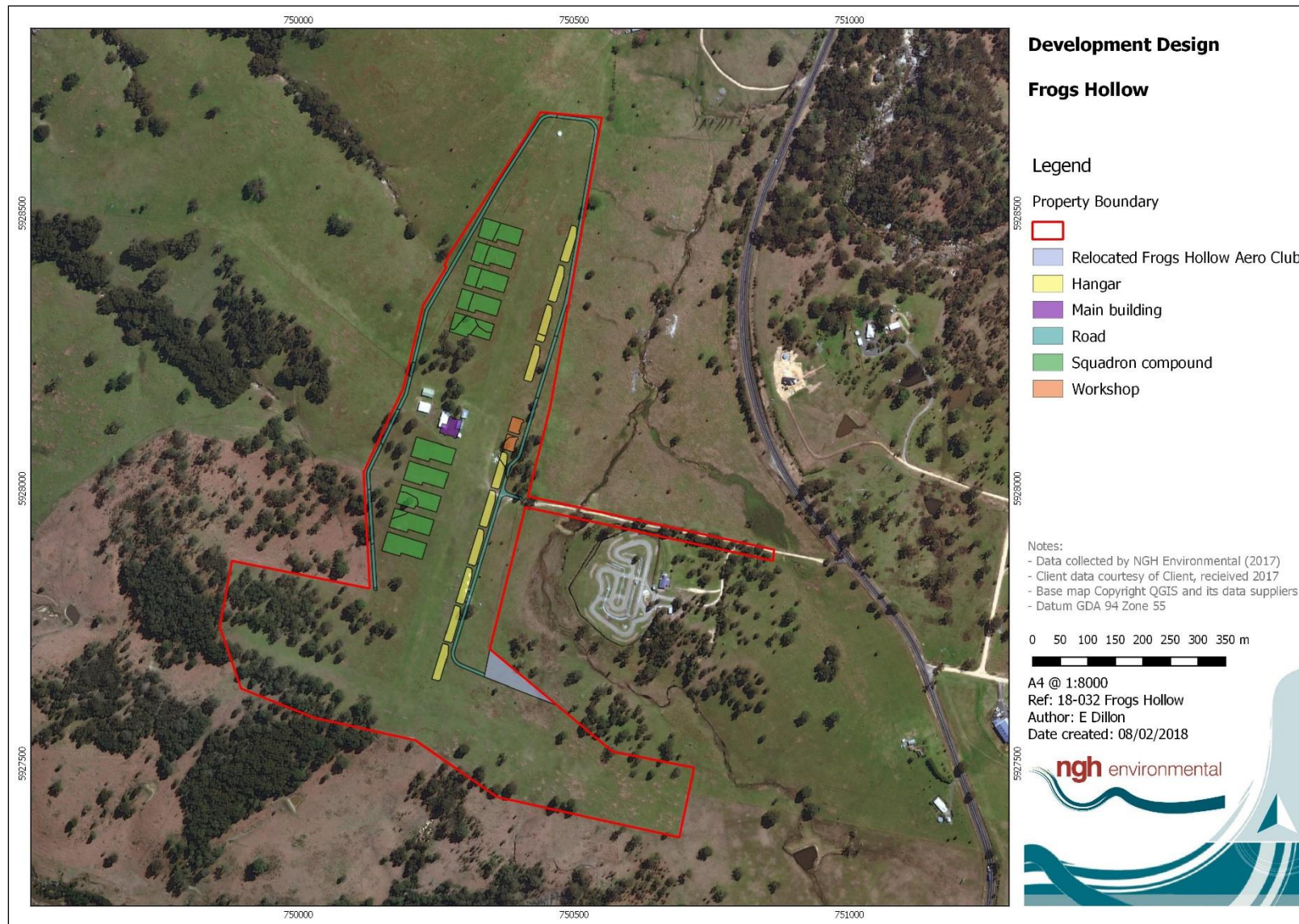


Figure 2 Proposed development design



## 2 GROUND DISTURBANCE

### ***Step 1. Will the activity disturb the ground surface or any culturally modified trees?***

The proposal area currently used as a recreational flight facility will involve the development of a new recreational flight school. The proposed development would include:

- The construction of 10 x separate squadron units, each with a footprint of approximately 2250 m<sup>2</sup> (30 m x 75 m). Each unit will be of single storey construction and provide accommodation for 12 people
- The construction of 10 x single storey hangers with an approximate footprint of 416 m<sup>2</sup> (52 m x 8 m)
- The construction of 1 x single storey showroom/ office
- The construction of 2 x small one storey buildings for the maintenance of planes.

Additional ancillary elements would include:

- Car parking spaces, water tanks and treatment plant, aviation fuel tanks
- No work is proposed to the existing airstrip
- Construction of a bridge over an existing gully and extension of an existing road. All roads will be sealed with bitumen to Council's Engineering standard
- Other components necessary for day to day operations.

These activities require significant ground disturbance, the use of heavy machinery and laydown areas. Any Aboriginal sites within the disturbance footprint would therefore be subject to harm.

The affirmation that ground disturbance will occur requires the next step in the due diligence process.

## 3 REGISTER SEARCH AND LANDSCAPE ASSESSMENT

### ***Step 2a. Search the AHIMS Database and other information sources***

A search of relevant heritage registers for Aboriginal sites and places provides an indication of the presence of previously recorded sites. It is to be noted that a register search is not conclusive, as it reflects only those areas that have been surveyed and that sites recorded are added to the register. As a starting point the search will indicate whether any sites are known within or adjacent to the investigation area. The Aboriginal Heritage Information Management System (AHIMS) is maintained by OEH and provides a database of Aboriginal heritage sites registered previously. The results of the search are able to be relied upon for 12 months for the purposes of a due diligence level assessment.

A search of the AHIMS database of an area approximately 20 km east-west by 20 km north-south, centred on the proposal area was undertaken on 5<sup>th</sup> of February 2018. The Coordinates for the search area were Lat, Long From: -36.8187, 149.7125 to Lat, Long -36.6962, 149.9067 with a buffer zone of 50 meters. The AHIMS Client Service Number was: 325991. There were 96 Aboriginal sites recorded within this search area with no declared Aboriginal Places. Table 1 shows the breakdown of site types and Figure 3 shows the location of the AHIMS sites in relation to the project area.

The 10 restricted sites from within the AHIMS search were assessed by David Gordon, Senior Heritage Information Officer with OEH on the 6<sup>th</sup> of February and it was established that these sites do not fall within the proposal area and will therefore not be impacted by the proposed works.

**Table 1 Breakdown of previously recorded Aboriginal sites in the region.**

Site Type	Registration	Number
Artefact	Aboriginal Site	49
Potential Archaeological Deposit (PAD)	Aboriginal Site	26
Restricted	Aboriginal Site	10
Artefact and Potential Archaeological Deposit (PAD)	Aboriginal Site	4
Modified Tree	Aboriginal Site	4
Ceremonial Ring (Stone or Earth)	Aboriginal Site	3
<b>TOTAL</b>		<b>96</b>

No currently recorded archaeological sites are present within or directly adjacent to the proposal area however, five sites occur within ~1 Km. These are summarised in Table 2:

**Table 2. Sites within ~1km of project area.**

Site Number	Site Name	Site Type	m to project boundary	Description
62-6-0091	Frogs Hollow 2; Canoe Tree Bega	Culturally Modified Tree	415	Scarred Tree
62-6-0086	Frogs Hollow 1	Open site	575	Artefact cluster
62-6-0663	Frogs Hollow-SU16/L2	Isolated artefact	687	1 artefact
62-6-0665	Frogs Hollow-SU5/L1	Open site	687	7 artefacts
62-6-0664	Frogs Hollow-SU16/L1	Open site	687	6 artefacts

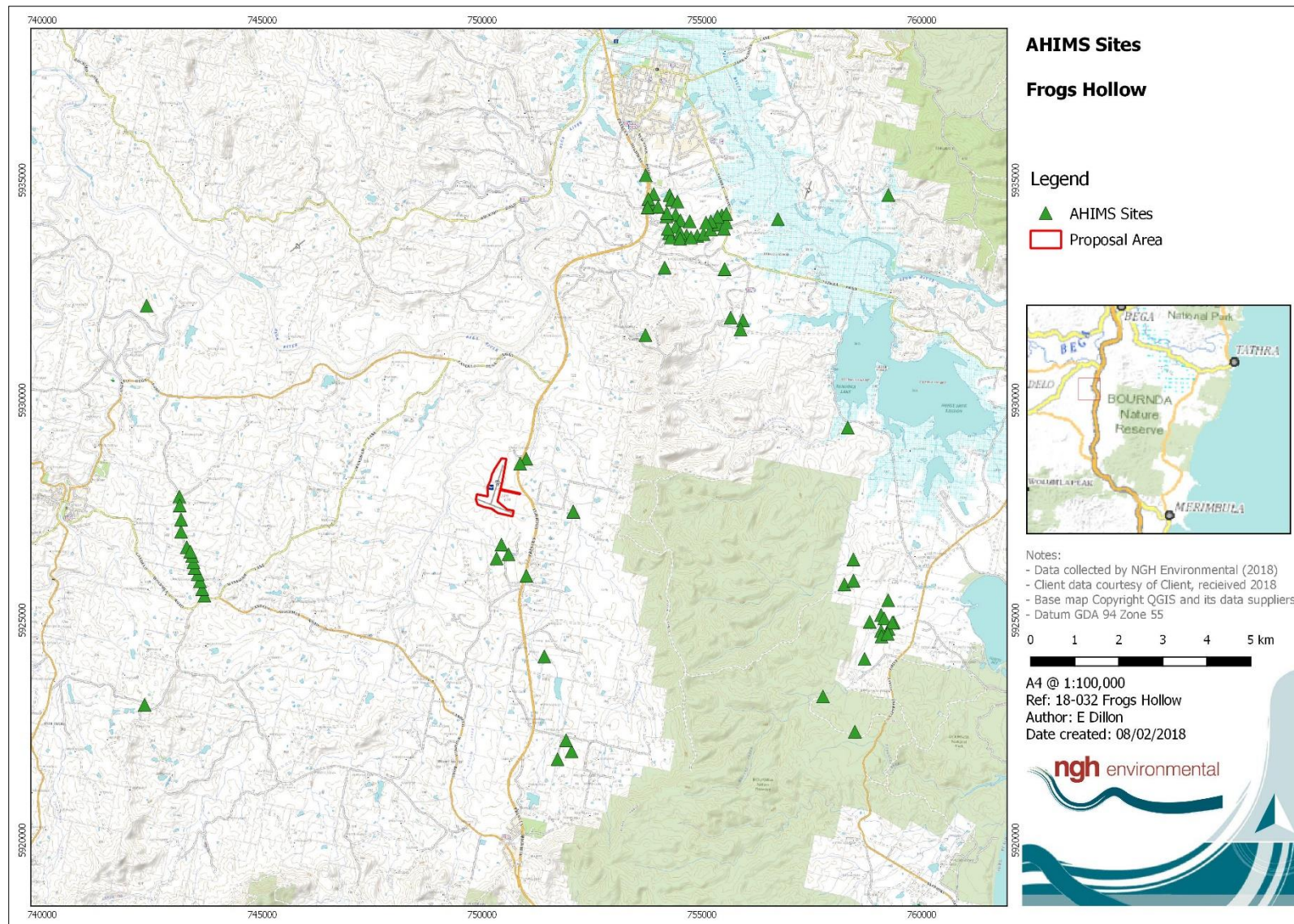


Figure 3 Results of AHIMS search over the proposed Frogs Hollow Recreational Flight School and surrounds



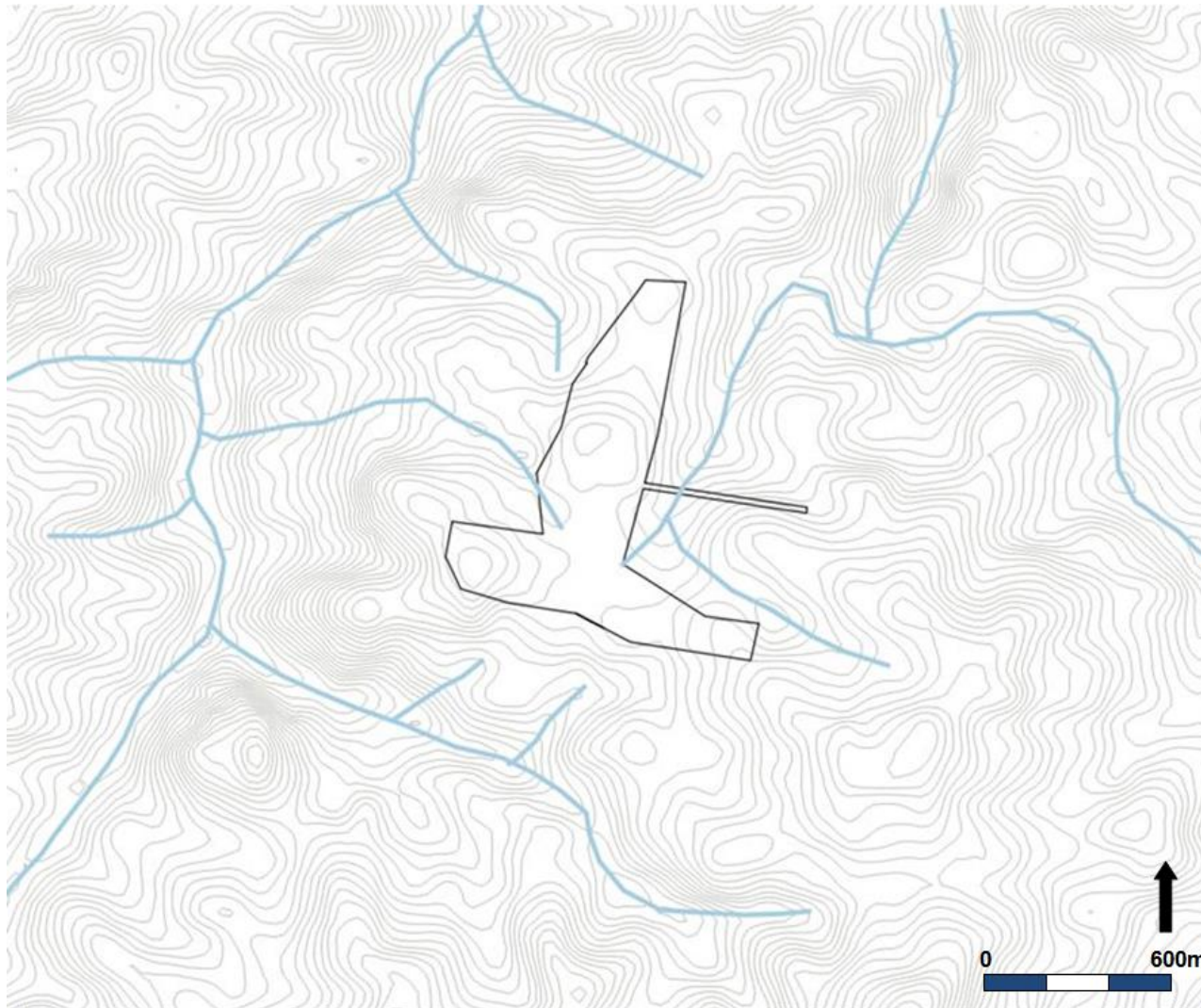


Figure 4. Topography of the Project Area – 2 m contours derived from 1 m Lidar (source <http://elevation.fsdf.org.au/>)



### **3.1 LOCAL ARCHAEOLOGICAL STUDIES**

The study area is located in the territory of the Yuin people, of which there were several clans. The Yuin territory extends south along the coast from the Shoalhaven in the north to around Eden in the south, and inland to the eastern edge of the tablelands (Howitt 1996, Egloff et al 2005). In addition to a rich ceremonial tradition, ethnohistorical sources indicate the diverse economy of the Yuin people. In terms of food sources or subsistence activities recorded, fish and fishing are commonly noted, in addition to the gathering of shellfish and also the exploitation of sea mammals where possible (Boot 1994, Sullivan 1982:25-27). In hinterland areas such as the present study area macropods and possums are the most frequently mentioned animal foods. Other animal food items mentioned include birds, honey, reptiles, dogs, grubs and bandicoots (Sullivan 1982:44). The most commonly mentioned plant foods are fruits, berries, cabbage palms and macrozamia (burrawangs), and there are references to roots and yams (Sullivan 1982:43).

The Aboriginal people of the area also had a diverse material culture, and ethnographically recorded items include; spears, both barbed and unbarbed and possibly made from two pieces of wood and pointed, clubs made of “heavy wood”, bark canoes which ranged from about 7’6” to 12’ in length, fishing lines and nets, stone axes, vine traps, ropes, weirs (as mentioned above for catching fish), bark huts, bark containers and shields, containers made from knots on trees, possum and kangaroo skin cloaks, possum fur string, items of personal adornment such as kangaroo tooth necklaces, body paint, belts and ‘kilts’ for ceremonial occasions, and ceremonial items such as bull roarers. (Sullivan 1982:25-77, Egloff 1979).

By the mid to late 1880’s traditional Yuin life had been severely disrupted. The initial ravages of disease combined with continued and accelerated loss of access to land, particularly after the passing of the 1861 Robertson Land Acts, meant the fully traditional Yuin way of life ceased (Sullivan 1982, AIATSIS Encyclopaedia of Aboriginal Australia). Nonetheless, Yuin people adapted to European life practices while retaining a great deal of their traditional knowledge and values.

Aboriginal people have utilised the resources of the South Coast hinterland for the past 20,000 years (Lampert 1971, Boot 1996a & b). Excavations in rock shelters confirm that the hinterland has been occupied for that period of time. Despite this evidence for the great antiquity of human occupation in the area, it is recognised that the majority of sites in the region date to within the last 5000 years (Boot 1996b:277).

#### **Selected Local Archaeological Studies**

Broad landscape archaeological surveys through the 1980s and 1990 set the broad context for our understanding of archaeological site patterning in the Bega Valley. Byrne (1983) found that 75% all sites were found on ridge lines, a proportion also observed by Byrne and Smith (1987) who recorded 50% of sites on saddles and 25% on ridge crests in a forest environment. Surveys in the NSW State Forests Eden Management area found that 81% of sites were on ridge lines in locations of low gradient (Heffernan and Boot 2000).

Dearling (2002) undertook a field survey as part of academic research at the ANU. In five sampled areas he recorded 119 open artefact scatters and 62 isolated artefacts. Ecotones were found to be the locations where the most complex sites were found. Dearling concluded that Aboriginal people

used the hinterland widely, though the intensity of use depended on local conditions, notably areas where a wider range of resources was available from a single location.

Saunders (2003, 2004) undertook survey and test excavation at a proposed subdivision on 'Glen Mia' to the south east of Bega. The survey phase recorded two scarred trees and four Potential Archaeological Deposits (PADs). Test excavation resulted in the recovery of a quartz dominated assemblage of 32 artefacts that also included volcanic and chert materials.

Saunders (2005) undertook a survey of parts of Kameruka Estate, recording three possible scarred trees, four PADs and an isolated artefact. The scarred trees and artefact were on spurlines and the PADs flanked Tantawangalo Creek.

At around the same time Dibden (2005, 2006a, 2006b) assessed three subdivision proposals between Wolumla and Bega. At South Bega (2005) ten Aboriginal sites were recorded, all being stone artefact scatters. At Wolumla (2006a) three sites were found in the 86 Ha study area, and the undulating country was assessed as being of generally low sensitivity. At Thornhill Road, South Bega (2006b) three artefact scatters were recorded in conditions of low surface visibility. The South Bega study was followed by test excavation (Dibden 2006c) that showed a widespread but variable scatter of stone artefacts with higher densities on level areas within 200m of water. The results included "numerous collections of...artefacts produced during single knapping events" (Dibden 2013:16), and: it was suggested that this pattern indicated archaeological material had undergone negligible post depositional disturbance.

Dibden (2006d) undertook a survey of 95 hectares at Wanatta Lane, Frogs Hollow in advance of a rural residential subdivision with the northern extent of that survey being ~500 m south of the present project area. Four Aboriginal archaeological sites were recorded, all of which were stone artefacts in clusters or isolation. Three of the sites were in spur crest locations and one, the largest site, was found in association with a drainage line.

AECOM (2009) undertook a study of a proposed central waste facility at Frogs Hollow, but recorded no Aboriginal heritage sites.

Dibden (2010) conducted test excavation at the proposed Bega Bypass, with stone artefacts found in all sample areas. The overall pattern of artefact location and density was considered to have a high correlation with the results achieved at South Bega (Dibden 2006c).

### ***Step 2b. Are there undisturbed landscape features likely to contain Aboriginal objects?***

The Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales outlines a range of landscape features that have higher potential to contain Aboriginal objects. It is also necessary to consider whether there are landscape features of undisturbed land that may contain Aboriginal objects. These include land that is:

- within 200 m of water,
- located within a sand dune system,
- located on a ridge top, ridge line or headland,
- located within 200 m below or above a cliff face, or
- within 20 m of a cave, rock shelter or cave mouth.

As outlined above, Aboriginal heritage sites have been recorded in the district, although not within the current assessment area.

Based upon the initial desktop assessment using satellite imagery and topographic data area it appears that there is moderate to high potential for Aboriginal Cultural Heritage to occur. The proposal area is situated on a broad, low ridge crest and upper slopes between Frogs Hollow Creek to the east and Wolumla Creek to the west.

The Due Diligence code of practice, archaeological studies in the region suggest that elevated low gradient areas directly adjacent to water, such as those seen within the proposal area, tend to have a high archaeological potential. Based upon the currently recorded AHIMS sites in the area there is potential for artefact scatters, isolated artefacts and culturally modified trees where old growth trees remain. Ceremonial and dreaming sites also have potential occur within the proposal area.

The desktop assessment therefore, indicates that there are landscapes present within the proposal area that have the potential to contain Aboriginal sites. The nature of the works being undertaken at this site will involve significant ground disturbance and it is therefore important that a visual inspection be undertaken.

## **4 IMPACT AVOIDANCE**

### ***Step 3. Can any AHIMS listed objects, or landscape features be avoided?***

The work being proposed for the Frogs Hollow Flight Training College involves construction of hangars and accommodation with attendant infrastructure. The construction of these features is moderately flexible, but the scale of the proposed development and requirement for reasonable access to the runway along the broad ridge crest means the ability to avoid potentially sensitive landscapes is limited.

The desktop assessment alone is not sufficient to conclusively appraise the archaeological potential of the landscape or the location of any sites and a visual inspection was conducted to properly appraise the existence and/or potential for Aboriginal sites to occur.

## **5 DESKTOP ASSESSMENT AND VISUAL INSPECTION**

### ***Step 4. Does the desktop assessment and visual inspection confirm that there are likely to be Aboriginal objects present or below the ground surface?***

The assessment process is primarily a desktop exercise, using available information such as the AHIMS search results and relevant archaeological reports that have been previously completed in the area. Visual inspection is also required where undisturbed landscape features are present that may contain sites.

A visual inspection of the project area was undertaken on Tuesday 22 February 2018 by qualified archaeologist Doug Williams with assistance from Ron Thomas of the Bega Local Aboriginal Land Council. The following provides a summary of the landscape and project areas in relation to the archaeological potential for Aboriginal objects to occur.

A total distance of ~5 Km was walked as part of the visual survey of the proposed development.

The current access point to the property is located in the eastern boundary of the project area and this will remain the primary access point for the facility. Native trees along the access track were inspected for any Aboriginal scarring or modification but none were seen.

The first transect section was walked in the south west corner of the proposed development, across the location of the southern group of squadron compounds. This topography is gently sloping ( $1^{\circ}$ - $2^{\circ}$ ) shoulder/upper slope of the broad crest which forms the runway. It is completely clear of native vegetation, comprising pasture cover varying in length from closely cut runway surface to grasses ~400mm high. The soil was a dark brown humic loam with prolific quartz angular gravel to 5 mm diameter. Visibility was ~1%. **No archaeological material was recorded, but the area was considered to have moderate to high potential to contain sub-surface archaeological material.**



Plate 1. View south along transect 1.

The second survey section encompasses the eastern boundary, corresponding to the row of proposed hangar buildings along that side of the property. The transect traversed ridge crest, upper slopes and included a broad saddle element at the northern end. Visibility was poor at ~1% overall, although there was one larger erosion scald where the access road enters the main property. The area is clear of older native vegetation with what native trees there are being more recent growth. There is a degree of disturbance along this corridor towards the centre of the length of the transect, with several concrete pads, fences and dilapidated structures occurring. **No archaeological material was recorded, but the area was considered to have moderate to high potential to contain sub-surface archaeological material.**



Plate 2. View north along eastern side of project area to saddle dipping in far ground.



The third survey section encompasses the north west corner of the proposed development, across the location of the northern group of proposed squadron compounds. This topography is moderately sloping ( $5^{\circ}$ - $7^{\circ}$ ), running from the shoulder/upper slope of the ridge crest west to the simple mid side slope. It is completely clear of native vegetation, comprising pasture cover mainly ~400 mm high at the time of inspection, with 1% visibility. **No archaeological material was recorded, and the area was considered to have low potential to contain sub-surface archaeological material due to higher gradient.**

Between the northern and southern squadron compounds is a raised, level knoll that is the location of existing infrastructure related to operation of the Frogs Hollow air strip facility as presently constituted.

The fourth survey section comprises a section of sloping land in the far south east of the proposed development area. It occupies side slopes and lower slopes, overlooking a drainage line (tributary to Frogs Hollow Creek) and the go-cart track to the east of the project area. The area had no surface visibility, being thicker pasture cover (Plate 3). **No archaeological material was recorded, and the area was considered to have low potential to contain sub-surface archaeological material due to higher gradient.**



Plate 3. View east to drainage gully and go-cart track.

The fifth survey section comprised the western and northern extents of the proposed track around the boundary of the facility (the eastern extent being inspected during the second survey transect). The southern part of this track crosses upper slope and spur crest topography, dipping to mid slope elements progressing north up the western boundary. The boundary track then returns to ridge crest and knoll topographic elements in the very north of the project area. Overall this survey transect had poor visibility (~1%). **No archaeological material was recorded, but elements of the track alignment that are less than  $3^{\circ}$  slope are considered to have moderate to high potential to contain sub-surface archaeological material.**

## 6 FURTHER ASSESSMENT

### ***Step 5. Is further investigation or impact assessment required?***

The Due Diligence Code of Practice states that if, after the desktop research and visual inspection is completed, it is evident that harm will occur to Aboriginal objects or heritage places then further and more detailed assessment is required.

The field assessment of this site confirmed the desktop assessment observations that the area is a broad, ridge crest flanked by permanent water sources to the east and west. The same topography that makes the location useful for aircraft take-off and landing, namely a gentle plateau sited within more dissected country, would indicate a higher archaeological potential than the immediate surrounds. Poor surface visibility hampered the field assessment of the project area, and as such this study did not locate any Aboriginal objects but identified the potential of the development to disturb Aboriginal objects which are likely to be within the deposits. As a consequence, development proposed for the crest and upper slopes of the ridge crest would warrant further assessment in the form of test excavation. This would also be applicable to any works on the runway surface itself (not currently planned).

## 7 RECOMMENDATIONS

1. The proponent should undertake an Aboriginal Cultural Heritage Assessment of the proposed flight training facility with a view to undertaking test excavation in the development footprint.
2. Test excavation could be undertaken under the NSW Code of Practice for Archaeological Investigation, following completion of Aboriginal community consultation procedures specific in the NSW OEH Guidelines for Aboriginal Community Consultation for Proponents.
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