



Our Ref: EV.317
Your Ref. 0667/16DA

21 June 2016

Ms Renah Givney
Senior Development Assessment Officer
Coffs Harbour City Council
2 Castle St
COFFS HARBOUR NSW 2450

Dear Renah,

**RE: ADDITIONAL INFORMATION REQUEST
 ARRAWARRA BEACH ROAD, ARRAWARRA**

I refer to your request for additional information in relation to our Cultural heritage assessment for Arrawarra Beach Road, Arrawarra dated 13 May 2016. Please find below further explanation of the issues raised by the Office of Environment and Heritage (OEH).

1. Known sites and relationship between those sites and Project Area.

The known Aboriginal sites (objects) are outlined within section 4.1. of the cultural heritage assessment. The Arrawarra 3 site (#22-1-0034) could not be confidently relocated without access to a site card- which we understand is not available from AHIMS. The Arrawarra Headland site (#22-1-0392) is recorded immediately west of the project area and the shell material identified at surface in the north-east portion of the project area has been identified as part of this site based on immediate proximity to it. The surface midden identified by the study can be registered as a new site on AHIMS should OEH wish to separate the site data and descriptions.

The archaeological site is located within the E2 environmental reserve zone. Proposed works in this general area include revegetation and the installation of the new seawall to the north of the current creek bank. Potential impacts to this site will be mitigated by undertaking revegetation works by hand and monitoring by a qualified person so as to ensure that the archaeological site is not unnecessarily damaged by machines. Impacts from the seawall and creek bank reclamation will primarily result from backfilling between the existing creek bank and the new wall. Impacts to the archaeological site from these works will be mitigated by temporary fencing, placement of temporary fabric over the site to ensure fill can be easily removed and monitoring machine movements.



Pedestrian activity is identified as the main long term potential impact, however this will not be significant greater than at present as this area is already utilised as an informal walkway.

2. The potential for subsurface objects.

The potential for subsurface objects is discussed in section 7.4., which includes a summary of 26 geotechnical investigations. Based on the geotechnical data, which include descriptions of soil type and inclusions such as shell fragments, it is reasonable to conclude that a subsurface 'lens' type midden does not occur within the project area.

An additional consideration is the amount of subsurface disturbance that has taken place within the Project Area since the establishment of the caravan park which has not resulted in the identification or recording of midden material. Such works include the installation of sub-surface sewerage and water infrastructure; excavation of post holes for bollards and signs around the caravan park; disturbance of soils of gardens at permanent caravan sites and the installation of stormwater drains. Everick's experience with coastal campgrounds on sand deposits is that middens, if present, typically have a surface expression around areas of disturbance.

3. The cultural significance of the Project Area.

The report has not assessed cultural significance on the basis that the recorded site is located within the proposed E2 reserve area and will not be subject to an AHIP application as part of the subdivision application. As the site is currently located on private land the midden is only accessible by residents and occupants of the caravan park. Under the proposed subdivision, the public will have increased access rights to access the midden area which we anticipate will increase the opportunities for Aboriginal community members to visit the site.

The assessment has demonstrated that an Aboriginal Place has not been declared over the Project Area. Whilst the potential impacts of the proposed sub-division on intangible cultural values are noted such valued and places would not be covered by the National Parks and Wildlife Act and as such we understand are not strictly required to be considered by the assessment.

4. Correlation between geo-tech investigations and Aboriginal cultural heritage assessment.

The use of hand-auger geotechnical investigations has been established as a methodology to understand sub-surface archaeological deposits in deep sand deposits such as Arrawarra Caravan Park. For example this technique has been applied by Everick Heritage Consultants on the Minjerribah Camping leases of North Stradbroke Island



to identify and map sub-surface archaeological deposits. In the context of the current study Everick was engaged to monitor part of the geotechnical investigations as a precautionary measure to assist in the identification of shell and stone should they be identified.

In this instance the excavation of archaeological test pits is not considered reasonable or practical given the requirement to 'bench' out the excavation walls when excavating deep sand deposits. The decision not to apply for an AHIP to undertake archaeological investigations outside the Code of Practice was based on the reasonable conclusion from the geotechnical sample that midden did not occur within the sand body.

Should you wish to discuss these matters further please contact Tim Hill, Senior Archaeologist on 0422309822.

Yours faithfully,

Tim Robins
Director/Archaeologist
Everick Heritage Consultants