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LEVEL 8, 123 PITT STREET  
SYDNEY NSW 2000**

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Urbis Pty Ltd  
ABN 50 105 256 228

8 April 2022

The General Manager  
Wagga Wagga City Council

To whom it may concern,

## ROWAN VILLAGE - INTERIM ARCHAEOLOGICAL LETTER - ABORIGINAL CULTURAL HERITAGE ASSESSMENT & CULTURAL VALUES ASSESSMENT

### 1. INTRODUCTION

Urbis has been engaged by DevCore Property Group ("the proponent") to conduct an Aboriginal Cultural Heritage Assessment (ACHA) to inform a Planning Proposal to Wagga Wagga City Council for the masterplan redevelopment of the site known as Rowan Village, within the Wagga Wagga South Growth Area, on Wiradjuri Country. Works will be undertaken under a future local Development Application. The lots which comprise the subject area include the following:

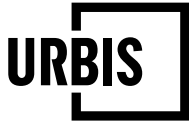
- f* Lot 18 DP 1054800.
- f* Lots 24, 26, 43, 65 and 66 DP 757246.
- f* Lot 23 DP 1063399.
- f* Lots 1 and 2 DP 1171894.

This ACHA is being undertaken in conjunction with a Cultural Values Assessment (CVA) prepared by Kate Waters. The ACHA and CVA aim to achieve the following:

- f* Investigate, identify and record any Aboriginal cultural heritage values across the site, be they tangible or intangible.
- f* Provide opportunities to empower Aboriginal community members and Cultural Knowledge Holders to be involved in conversations regarding the development of the subject area, the design development process, and development of harm mitigation strategies.
- f* Provide mitigation measures to avoid harm to areas of tangible or intangible cultural sensitivity, including through the provision of design advice to avoid areas of sensitivity.
- f* Provide a comprehensive understanding of the tangible and intangible cultural values of the site, to inform future interpretation to be guided through consultation.

The preparation of these assessments is still ongoing, and this letter serves as a progress update to accompany the Planning Proposal, to identify works completed to date and works to be completed across the duration of the project.

Urbis have provided initial input into the Indicative Layout Plan (ILP) from an Aboriginal cultural heritage perspective on the basis of preliminary background research & results. This has



recommended the retention of all native vegetation where possible, and the formation of green corridors around extant waterways. These recommendations have been incorporated into the ILP.

## 1.1. SUBJECT AREA LOCATION AND CONTEXT

The subject area is located in Western NSW, within the Wagga Wagga Local Government Area on the traditional lands of the Wiradjuri people and within the catchment of the Wagga Wagga Local Aboriginal Land Council (WWLALC). It is currently zoned as part RU1 Primary Production and part R5 Large Lot Residential.

The subject area encompasses approximately 225.02 hectares (2,250, 227m<sup>2</sup>) and has frontages to Holbrook Road to the west and Rowan Road to the south. To the north, there is R5 Large Lot Residential zoning and to east, south, and west it is RU1 Primary Production.

The majority of the subject area is in the Redbank Soil landscape. Soils are moderately deep (80-100 cm) and consist of Eutrophic Brown Chromosols on slopes. The soils along the drainage lines consist of Mottled Subnatric Brown Sodosols. There is a high erosion hazard with possible exposures present on site that will need to be checked for isolated Aboriginal objects, i.e Artefacts or Artefact Scatters.

The dominant soil materials consist of brown loam, dull sandy loam, reddish clay, mottled yellowish clay. Due to depths of soils, the subject area contains potential for PADS. Surface finds are also likely to be present.

The site contains approximately 6 ponds (varying sizes), and ephemeral drainage lines (1st, 2nd and 3rd order) associated with Stringybark Creek. The water sources are likely to have higher potential for Aboriginal objects and will need to be closely surveyed. In addition, the subject area is approximately 2 km south-east from Lake Albert catchment area, which is the closest and largest permanent water source in the surrounding landscape.

The native vegetation has been mostly cleared for agricultural purposes with the exception of trees along roads and drainage lines, and minor remnant stands of vegetation within the subject area. The most common tree species for the Redbank Soil landscape are white box, grey box, yellow box and red stringybark.

The subject area is located across the western foothills of the Great Dividing Range and consists of undulating hills. The landscape is very gently inclined adjacent to granite hills.

The land has been used for cropping wheat, barely, cereal, rye and pasture of dryland lucerne. Sheep and cattle have grazed on the steeper parts near the hill and along drainage lines.

A search of the Aboriginal Heritage Information Management System (AHIMS) has been undertaken to inform preliminary assessments, undertaken on 20<sup>th</sup> December 2021. The AHIMS search identified 0 Aboriginal objects and 0 Aboriginal places within the subject area. The search identified one site on the south-western boundary of the subject area is AHIMS ID #56-1-0585. It is a modified ring tree that appears to be in an alignment with a further 3 other modified trees, running to the south-west of the subject area. The site is recorded as being in good condition.



## 2. METHODOLOGY

Urbis submits this letter in anticipation of the completion of the ACHA (as per the program in Table 1).

### 2.1. ABORIGINAL CULTURAL HERITAGE ASSESSMENT

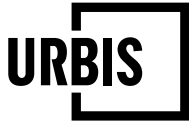
The ACHA process has been completed to Stage 1.3 of consultation. The ACHA is being undertaken in accordance with Part 6 of the *NSW National Parks and Wildlife Act 1974* ('NPW Act'), Part 5 of the *NSW National Parks and Wildlife Regulation 2019* ('NPW Reg') and will adhere to the following guidelines:

- f The Aboriginal Cultural Heritage Consultation Requirements for Proponents* (Department of Environment, Climate Change and Water NSW, 2010).
- f Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (Department of Environment, Climate Change and Water NSW, 2010).
- f Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales* (Office of Environment and Heritage, Department of Premier and Cabinet, 2011).
- f The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (Australia ICOMOS, 2013).

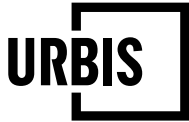
The below table (Table 1) provides a summary of works completed to date, and works to be completed across the duration of the project.

Table 1 – ACHA Methodology

Stage	Description	Date Commenced	Date Completed
<b>STAGE 1</b>			
1.1	A search of the Native Title register and Native Title Claims register was undertaken. No Native Title claims or determinations identified.	25 <sup>th</sup> February 2022	28 <sup>th</sup> February 2022
1.2	Agency Notices were provided to all required government agencies to request provision of a listed of Aboriginal groups or individuals who may wish to register for consultation on the project (potential stakeholders).  5 potential stakeholders identified.	1 <sup>st</sup> March 2022	4 <sup>th</sup> March 2022  <i>(considered completed upon receipt of response from HNSW)</i>
1.3	Identified potential stakeholders were contacted and invited to register for the project. Simultaneously, a public notice was published in The Daily Advertiser inviting people to register for the project.	9 <sup>th</sup> March 2022	23 <sup>rd</sup> March 2022



Stage	Description	Date Commenced	Date Completed
	4 people registered for the project on the basis of these invitations. A list of Aboriginal Groups is included below.		
<b>STAGE 2</b>			
2	Project information provided to all RAPs, including environmental and archaeological context, as well as project methodology and predicted timeline.  Concurrent with Stage 3 below.	8 <sup>th</sup> April 2022	6 <sup>th</sup> May 2022
<b>STAGE 3</b>			
3	RAPs were asked to provide any information on the cultural significance of the subject area.  Concurrent with Stage 2 above.	8 <sup>th</sup> April 2022	6 <sup>th</sup> May 2022
N/A	Meeting with RAPs to discuss Stage 2 and 3 Document and preliminary thoughts on Cultural Significance and Indicative Layout Plan (ILP).  Meeting held virtually.	18 <sup>th</sup> April 2022	21 <sup>st</sup> April 2022
N/A	Full coverage archaeological site survey of the subject site undertaken, to identify any surface archaeological deposits or marked trees, areas of likely subsurface deposits, ground truth understandings of environmental context and provide opportunities for conversations with RAPs.  Survey anticipated to run for three days.	9 <sup>th</sup> May 2022	13 <sup>th</sup> May 2022
<b>STAGE 4</b>			
N/A	Test excavation will be undertaken with RAPs present on site if identified as a requirement following the site survey, and if possible to be undertaken under the Code of Practice, either at this stage or following approval of the planning proposal pending project requirements. If an Aboriginal Heritage Impact Permit (AHIP) is required to undertake testing, this will occur	N/A	



Stage	Description	Date Commenced	Date Completed
	<p>after the receipt of an approved Development Application.</p> <p>If able to be undertaken at this stage, Urbis will prepare an Archaeological Technical Report (ATR) to accompany the ACHA and detail the results of excavation.</p>		
<b>4-A</b>	Provision of draft ACHA (and ATR, if required) to RAPs for review.	Within 1 week of site survey or 1 month of excavation.	4-6 weeks after the commencement date pending scale of report.
<b>4 -B</b>	<p>Progress draft ACHA to be submitted to RAPs at various points across project to correspond to major updates as required (for example DA Phase) to seek further comment.</p> <p>A final ACHAR will be provided for the final Planning Proposal submission.</p> <p>4-week comment period to be provided each time.</p>	N/A	
<b>STAGE 5</b>			
<b>N/A</b>	Consultation is to be kept active and ongoing for the duration of the project through to Development Application and Construction phase.	Duration of the project.	
<b>N/A</b>	If an AHIP is required, an application will be submitted following the receipt of Development Application approval.	DA phase.	
<b>5</b>	Final ACHA to be submitted to RAPs (along with AHIP, if required) prior to the commencement of construction and within 1 month of receipt of AHIP.	Construction phase.	

*\*asterisk indicates stage not yet completed, dates provided to be viewed as a guideline and contingent on progress of the overall project.*

### List of Registered Aboriginal Parties:

- f* Wagga Wagga Local Aboriginal Land Council.
- f* Bundyi Aboriginal Cultural Knowledge.
- f* Miyagan Culture & Heritage.
- f* Konanggo Aboriginal Cultural Heritage Services.

Urbis will continue to consult meaningfully with the above RAPs and provide updates to Council as and when required. Meetings will be held at various stages across the consultation process with RAPs and cultural knowledge holders to discuss design, test excavation, methodology, recommendations and approach.

## 2.2. CULTURAL VALUES ASSESSMENT

An Aboriginal Cultural Values Assessment (CVA) is being undertaken to ensure that the broader cultural landscape values and site-specific intangible cultural values are captured and considered within the ACHA process. The CVA methodology involves utilising oral history and cultural mapping techniques during on-Country engagement with cultural knowledge holders (as identified by the Registered Aboriginal Parties) supported by detailed historical and ethnographic archival research. Undertaking a CVA is in line with best practice as reflected in the following guidelines and practice notes:

- f* *The Aboriginal Cultural Heritage Consultation Requirements for Proponents* (Department of Environment, Climate Change and Water NSW, 2010).
- f* *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales* (Office of Environment and Heritage, Department of Premier and Cabinet, 2011).
- f* *The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance* (Australia ICOMOS, 2013).
- f* *Practice Note: The Burra Charter and Indigenous Cultural Heritage Management* (Australia ICOMOS).
- f* *Practice Note: The Burra Charter and Intangible Cultural Heritage & Place* (Australia ICOMOS).
- f* *Practice Note: The Burra Charter and Understanding Cultural Routes* (Australia ICOMOS).
- f* *Ask First: A guide to respecting Indigenous heritage places and values*, Australian Heritage Commission, 2002.
- f* *Draft Connecting with Country: A draft framework for understanding the value of Aboriginal knowledge in the design and planning of places* (Government Architect New South Wales, 2020).

The below table (Table 2) provides a summary of works completed to date, and works to be completed across the duration of the project.

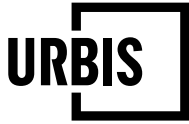
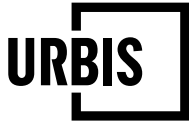


Table 2 –CVA process

Stage	Description	Date Commenced	Date Completed
<b>STAGE 1</b>			
1	Draft methodology for Cultural Values Assessment (CVA) provided to all RAPS.	8 <sup>th</sup> April 2022	21 <sup>st</sup> April 2022
1	Meeting with RAPS to discuss draft CVA methodology. Meeting held virtually.	18 <sup>th</sup> April 2022	22 <sup>nd</sup> April 2022
<b>STAGE 2</b>			
2	Final methodology for CVA issued and request made for nomination of cultural knowledge holders.	2 <sup>nd</sup> May 2022	6 <sup>th</sup> May 2022
2	Initial engagement with cultural knowledge holders to confirm project participation and establish information management protocols.	9 <sup>th</sup> May 2022	13 <sup>th</sup> May 2022
<b>STAGE 3</b>			
3	Field surveys, interviews, and cultural mapping with cultural knowledge holders.	17 <sup>th</sup> May 2022	31 <sup>st</sup> May 2022
3	Consultation with cultural knowledge holders to confirm findings.	1 <sup>st</sup> June 2022	3 <sup>rd</sup> June 2022
<b>STAGE 4</b>			
4	Draft CVA to be provided to RAPS and cultural knowledge holders for review. 4-week comment period.	Within 1 month of completion of field surveys and cultural mapping.	4 weeks from commencement date.
4	Updated draft CVA to be provided to RAPS and cultural knowledge holders for review if major updates occur. 4-week comment period to be provided each time.	N/A	
<b>STAGE 5</b>			



Stage	Description	Date Commenced	Date Completed
5	Design and facilitation of Designing with Country workshops with RAPs, cultural knowledge holders and Aboriginal community members.	N/A	

### 3. CONCLUSIONS & RECOMMENDATIONS

Urbis and Waters Consultancy are underway with the ACHA and CVA and will continue to progress these assessments across the duration of the project. As results from these assessments become available, this should be incorporated into the design to ensure areas of cultural sensitivity are avoided where possible and risk of impact is mitigated through design. On a preliminary basis, we conclude that the subject area has high potential to contain both tangible and intangible cultural heritage values which should be protected, conserved, and interpreted where possible, in consultation with the RAPs and cultural knowledge holders.

Urbis support the ILP on a cultural heritage basis, with the provision that this is subject to change pending the results of the ACHA and CVA process, with the preference being to avoid impacts in areas of higher sensitivity.

Urbis recommend that the ACHA and CVA be completed in accordance with the methodologies provided in Section 2.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "M Walker".

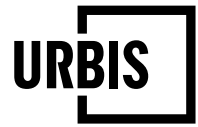
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## APPENDIX A

## CONSULTATION DOCUMENTS TO DATE



## APPENDIX B

## METHODOLOGY PROVIDED FOR CVA