

Our ref: HMS ID 11655

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Letter uploaded to the Major Projects Planning Portal

Updated Aboriginal Cultural Heritage Management Plan – State Significant Development

Proposal: UON City Campus Student Accommodation

Major Project reference: SSD-61618229-PA-13

Received: 29 August 2025

Dear Bailey,

Thank you for your referral seeking advice on the updated Aboriginal Cultural Heritage Management Plan (ACHMP) for the above State Significant Development.

It is noted that the ACHMP has been updated to include evidence of consultation with Registered Aboriginal Parties. Heritage NSW has no further comment on the ACHMP at this time.

Please note that the above comments relate only to Aboriginal cultural heritage regulation matters. If you have any questions about this correspondence, please contact James Cole, Senior Assessments Officer at Heritage NSW on (02) 9873 8500 or heritagemailbox@environment.nsw.gov.au

Yours sincerely,

Corey O'Driscoll

Corey O'Driscoll
Practice Lead – Major Projects
Heritage NSW
Department of Climate Change, Energy, the Environment and Water
As Delegate under *National Parks and Wildlife Act 1974*
11 September 2025

**UNIVERSITY OF NEWCASTLE CITY CAMPUS
STUDENT ACCOMMODATION: SSD-61618229**

Aboriginal Cultural Heritage Management Plan

FINAL

August 2025



UNIVERSITY OF NEWCASTLE CITY CAMPUS STUDENT ACCOMMODATION: SSD-61618229

Aboriginal Cultural Heritage Management Plan

FINAL

Prepared by
Umwelt (Australia) Pty Limited
on behalf of
The University of Newcastle

Project Director: Ryan Desic
Project Manager: Alison Fenwick
Report No. 23355/R01
Date: August 2025



This report was prepared using
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Acknowledgement of Country

The University of Newcastle acknowledges the traditional custodians of the lands which the University resides: the Awabakal, Darkinjung, Biripai, Worimi, Wonnarua and Eora Nations..

We also pay our respect to the wisdom of the Elders, past, present and emerging. The University would like to extend this acknowledgement to the Awabakal and Worimi who are the traditional custodians of the land upon where the City Campus Student Accommodation site is located.

The University recognise that First Nations sovereignty was never ceded. This continent always was and always will be Aboriginal Land.

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Document Status

Rev No.	Reviewer		Approved for Issue	
	Name	Date	Name	Date
V1 (DRAFT for RAP Rev)	Ryan Desic	11/04/2025	Ryan Desic	17/04/2025
V2 (FINAL)	Ryan Desic	28/05/2025	Ryan Desic	28/05/2025
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V4 (Revision FINAL)	Ryan Desic	25/08/2025	Ryan Desic	28/08/2025

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1.0 Introduction

1.1 Background

The University of Newcastle is progressing with Stage 1B of the University's City Campus, including a nine-storey building for the purpose of campus student accommodation and ground floor retail (herein referred to as 'the Project').

The Project is identified as a State Significant Development (SSD) site by virtue of Condition A5 of the Concept Plan SSD-9262 Consent and by virtue of Schedule 2 of State Environmental Planning Policy (Planning Systems) 2021. A Concept Plan (SSD-9262) granted approval by the Minister for Planning and Public Spaces on 21 May 2020, applies to the site. The Concept SSD established the maximum building envelope, gross floor area and preferred land use to facilitate the future redevelopment of the site. Additionally, the Concept Proposal provides a design excellence framework to guide future development within the building envelopes and achieve design excellence.

Secretary's Environmental Assessment Requirements (SEARs) were issued for the Project on 31 August 2023 under SSD-61618229. An environmental impact statement (EIS) was prepared to accompany the development application for the Project and address the requirements of State agencies under the *NSW Environmental Planning & Assessment Act 1979* (EP&A Act). An Aboriginal Cultural Heritage Assessment (ACHA) (Umwelt 2024) was prepared to inform the Project EIS.

Development consent (the consent) was granted by the Department of Planning, Housing and Infrastructure (DPHI) in May 2025. The consent requires the preparation and implementation of management plans, strategies, protocols and procedures detailing environmental commitments, controls and performance objectives throughout Project construction and operation. This Aboriginal Cultural Heritage Management Plan (ACHMP or 'the plan') is required in accordance with Condition of Approval (CoA) B56 and associated protocols, management and mitigations set out for Aboriginal heritage in the consent.

This plan incorporates the relevant management measures presented in the Project EIS (Umwelt 2024) prepared for the Project and submitted as part of the EIS.

1.2 Project Overview

1.2.1 Project Area

The University of Newcastle City Campus is located within the City of Newcastle Local Government Area (LGA) at 16 Honeysuckle Drive, Newcastle (**Figure 1.1** and **Figure 1.2**). It is on the lands of the Awabakal and Worimi peoples.

Specifically, Site B (Stage 1B in the approved concept masterplan) is located at the southwestern corner of the University's City Campus. Site B has an overall area of 3,341 m² and is legally described as Lot 2 in DP 1247375. Landscaping and public domain works will be undertaken in a portion of Wright Lane and is legally described as Lot 5 in DP 1247375. Together, these areas comprise the 'Project Area'. Both Lot 2 and Lot 5 in DP 1247375 are owned by the University of Newcastle.

FIGURE 1.1
Local Context



Legend

-  Project Area
-  Waterbody
-  Watercourse
-  Road
-  Track



0 25 50
Metres

Scale 1:2,500 at A4
GDA2020

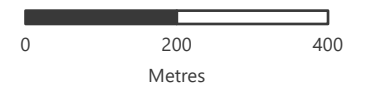
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FIGURE 1.2
Regional Context

Legend

-  Project Area
-  Suburb
-  Waterbody
-  Watercourse
-  Road



Scale 1:10,000 at A4
GDA2020 MGA Zone 56

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1.2.2 Project Overview

1.2.2.1 Overview

The Project will generally involve the following works, as illustrated in **Figure 1.3**:

- Construction of a nine (9) storey building (known as Building B), to be used for campus student accommodation and retail. Building B will have a maximum gross floor area (GFA) of 10,765 m², comprising of:
 - Approximately 130 m² of retail floor space at ground level
 - Approximately 683 m² of communal residential amenity facilities at ground level
 - Approximately 9,520 m² of student accommodation including a total of 445 beds.
- Maximum building height of Reduced Level 33.85 (nine storeys excluding plant and services).
- Maximum height of RL 37.53 (building including plant and services).
- End of trip facilities, including 90 bicycle spaces and back of house amenities.
- Landscaping and public domain works.
- The ground floor level will be built-up to RL 2.9 which is approximately 500 mm (on average) above the ground level across the Project Area.

Figure 1.3 The Project Design Concept

1.2.2.2 Ground Disturbing Activities

The Project will involve a range of construction activities incorporating various heavy machinery, plant and equipment that will operate in several locations across the Project Area. Only Project activities that will extend to certain depths below current ground level within the original shoreline of the Hunter River have potential to impact the Aboriginal cultural heritage values associated with the Project Area (present as the archaeological resource of AHIMS #38-4-2024).

Ground disturbing activities with the potential to intersect with the underlying archaeological deposit are limited because the ground floor level will be built-up to RL 2.9 which is approximately 500 mm (on average) above the ground level across the Project Area. This will generally result in an approximate 1 m buffer between the new building level to the archaeological deposit, except for the specific activities that are addressed in this section.

The Project includes construction activities that will require ground disturbance. As outlined in **Table 1.1** and in **Figure 1.4**, sub-structure and sub-surface services will require excavation and earthworks to varied depths. All ground disturbance activities will be contained within the Project Area. However, the final depths of excavation may vary based on required build. **Figure 1.4** illustrates an overview of the proposed ground disturbance activities within the Hunter River shoreline inclusive of a 10 m buffer.

As outlined in the ACHA (2024) and discussed in **Section 4.1**, Project works undertaken at depths exceeding ~400 mm from current ground surface and within the original Hunter River shoreline may intersect natural soils with archaeological deposits. This is dependent on the location and nature of the works but provides a conservative estimate so that all relevant Project activities are assessed for their potential impacts to the archaeological resource.

FIGURE 1.4
Overview of Ground
Disturbing Activities

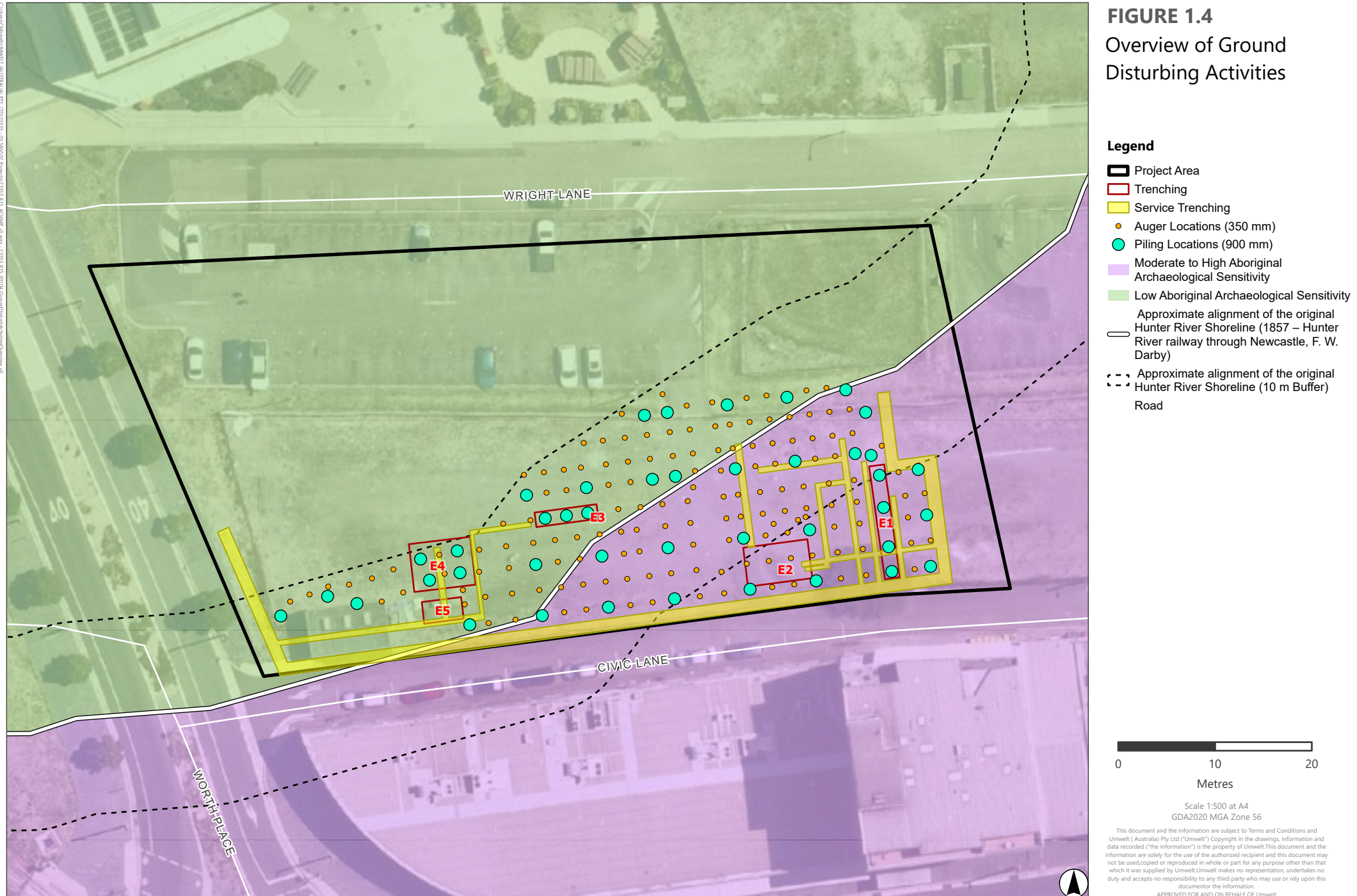


Table 1.1 Ground Disturbing Activities

Project Component	Activity Causing Impact/Potential Impact to Aboriginal Heritage
Installation of piles and pile caps	Localised earthworks that involve the disturbance of potentially artefact bearing sub-surface soils. Pile diameter: 900 mm. Estimated range of depth: <500 mm to 1,500 mm below ground surface. Quantity: 44 piles within Hunter River shoreline inclusive of 10 m buffer.
Stormwater services	Trenching and earthworks that involve the disturbance of potentially artefact bearing sub-surface soils. Estimated range of depth: 500 mm to 1,400 mm below ground surface. Lineal meters of trenching: 200 m within Hunter River shoreline inclusive of 10 m buffer.
Lint trap and sewer line	Trenching and earthworks that involve the disturbance of potentially artefact bearing sub-surface soils. Estimated range of depth: 600 mm to 800 mm (internal), 1,700 mm to 2,000 mm (external) below ground surface. Lineal meters of trenching: 50 m extra over the shared trench with other services within Hunter River shoreline inclusive of 10 m buffer.
Common service trench	Trenching and earthworks that involve the disturbance of potentially artefact bearing sub-surface soils. Estimated range of depth: 600 mm to 2,000 mm below ground surface. Lineal meters of trenching: incl in other trenching works within Hunter River shoreline inclusive of 10 m buffer.
Electrical cable trench	Trenching and earthworks that involve the disturbance of potentially artefact bearing sub-surface soils. Estimated range of depth: 1,000 mm to 1,200 mm below ground surface. Lineal meters of trenching: 80 m within Hunter River shoreline inclusive of 10 m buffer.
Ground improvement works	Review of geotechnical information during detailed design has identified the need for additional ground improvement work. The method involves the use of rigid inclusions to enhance ground stability. Rigid inclusions will be installed using a displacement auger (i.e. augured material will be retained underground rather than being brought to the surface). Estimated depth: 7,000 mm below ground surface. Auger diameter: 350 mm Quantity: 144 auger locations within mapped Hunter River Shoreline including buffer** Total footprint: 13.8 m ²

**Note that the ground floor level will be built-up to RL 2.9, approximately 500 mm (on average) above the ground level across the Project Area.*

*** Note that the number of auger locations within the actual shoreline would be dependent on the accuracy of historical mapping. The estimate of 144 is a conservative estimate based on the entire buffered area and is likely to be less than this estimate.*

1.3 Purpose and Objectives

This ACHMP describes how the University of Newcastle will manage impacts to Aboriginal cultural heritage values within the Project Area during Project construction and utilisation.

Specific objectives of the ACHMP are to address CoAs by providing requirements on:

- processes to maintain ongoing consultation with the Project's registered Aboriginal parties (RAPs) and Heritage NSW

- management procedures for Aboriginal cultural heritage values associated with the Project during pre-construction and construction phases
- protocols and procedures for new cultural finds, including Aboriginal objects and human remains
- other administrative requirements, including post-project management of Aboriginal heritage finds and recovered material, ongoing compliance, regular review and update of the ACHMP to ensure its functionality is maintained through the Project.

The ACHMP is prepared for a mixed audience of consent authorities, environmental regulators, Aboriginal stakeholders and site personnel; the latter of which are responsible for implementing this plan as part of day-to-day operations.

1.4 ACHMP Implementation

1.4.1 Implementation

Prior to commencing construction, the University of Newcastle will prepare and submit this ACHMP for the development to the satisfaction of DPHI.

1.4.2 Roles for Implementation

University of Newcastle will implement this ACHMP as approved by the CoAs. The individuals responsible for the implementation of the plan are provided in **Table 1.2**. The plan will be stored in University of Newcastle's document control system; the latest version will be available electronically at all times. As the document owner, University of Newcastle is the contact point for this plan and its requirements and will provide guidance and training to any person that requires additional training regarding this plan.

Table 1.2 Roles and Responsibilities for Aboriginal Heritage Management

Role	Responsibilities
Project Manager (University of Newcastle)	• Ensure that the ACHMP is implemented as approved by the Secretary. • Ensure adequate financial and personnel resources are made available for the implementation of this plan.
Environment and Stakeholder Advisor (University of Newcastle)	• Ensure the implementation of this plan is carried out appropriately during construction/operations. • Ensure the Aboriginal heritage management measures required to be undertaken prior to ground disturbance activities are conducted in accordance with the measures outlined in this plan. • Distribute copies of this plan as required. • Engage and coordinate relevant specialist personnel to undertake management measures or additional assessment as specified in this plan. • Arrange for a review of this plan in accordance with review cycles and conditions specified in this plan.
Project Archaeologist	• Implementing relevant management measures that require archaeologist supervision. • Primary contact with RAPs • Maintain records of Aboriginal consultation. • Ensure relevant reporting, data management and registration is conducted, maintained and updated.

Role	Responsibilities
	- Undertaking heritage assessments where required. - Assistance in implementing responsibilities of the Environment and Stakeholder Advisor, where engaged by University of Newcastle.
Construction Manager (or delegate) and HSE Support (Principal Contractor)	- Manage the implementation of this plan during construction and operation (Construction Manager). - Reporting new/unexpected finds, incidents or non-compliance (Construction Manager and HSE Support). - Authorizing stop work in the event of new/unexpected finds (Construction Manager or delegate). - Ensure inclusion of Aboriginal heritage in work inductions through delivery or input to induction documents (Construction Manager and HSE Support).

1.5 Document Structure

The structure of the ACHMP is outlined in **Table 1.3**.

Table 1.3 Structure of the ACHMP

Section	Content
Section 1.2.2 Section 1.3	Provides an overview of the Project and objectives of the plan.
Section 2.0	Outlines statutory requirements associated with the development consent, and regulator consultation undertaken by the specialist in developing the plan.
Section 3.0	Provides an overview of Aboriginal consultation completed for the Project, and processes to maintain ongoing consultation with the Project 's registered Aboriginal parties (RAPs).
Section 4.0	Provides an overview of the Aboriginal cultural heritage context of the Project Area and surrounds which has provided the basis for the Aboriginal heritage management measures presented in this ACHMP.
Section 5.0	Provides management procedures for Aboriginal cultural heritage for the Project during pre-construction and construction. Provides protocols and procedures for new cultural finds, including Aboriginal objects and human remains.
Section 5.2.3	Provides the archaeological excavation methodology for the relevant Aboriginal sites requiring this management measure.
Section 6.0	Provides requirements, procedures and protocols for compliance, training, review and improvement.
Section 7.0	References.
Appendix 1	Provides site definitions and descriptions for a range of Aboriginal site types.
Appendix 2	Provides details of Aboriginal consultation undertaken in preparing the ACHMP.
Appendix 3	Provides an overview of relevant legislation and reporting requirements under NSW law.

1.6 Authorship

The ACHMP was prepared by Umwelt Archaeologist Alison Fenwick and Principal Archaeologist, Aboriginal Heritage Team Leader Ryan Desic (BA Hons Historical and Prehistoric Archaeology) who are suitably qualified and experienced archaeologist and heritage consultants.

2.0 Statutory Requirements

2.1 Development Consent

This ACHMP has been prepared in accordance with the development consent. **Table 2.1** presents the consent conditions relevant to the ACHMP and identifies where each condition has been addressed in this plan.

Table 2.1 Management Plan Requirements Relevant to Aboriginal Cultural Heritage

Condition No.	Condition Requirement	Section Reference
B56	Prior to the commencement of works, the Applicant must prepare an ACHMP for the development. This plan must:	
	a. be prepared by a suitably qualified and experienced person	Section 1.6
	b. be prepared in consultation with the RAPS and reviewed by Heritage NSW	Section 3.3
	c. include a methodology for a test excavation and salvage excavation program with Aboriginal Stakeholder participation of sites to be impacted with consideration to understanding site characteristics, and local and regional archaeological context	Section 5.0
	d. include a description of the measures (and associated methodologies) that would be implemented for:	
	i) salvaging and relocating the Aboriginal heritage items located within the approved development footprint;	Section 5.2
	ii) include updated baseline mapping of the heritage items within and adjoining to the development disturbance area;	Section 4.2
	iii) include updated mapping of all areas that have been and will be subject to test excavations, and salvage excavations;	Section 5.2.3
	iv) include conservation options for the mitigation and avoidance to impacts AHIMS registered sites situated within and outside the project footprint;	Section 5.0
	v) include a procedure for assessing significance of Aboriginal Objects identified during the test excavations, and salvage excavation and ensure that the management and mitigation measures are considered for all sites, and with special consideration for those of high significance	Section 5.0
	vi) the long-term management of any Aboriginal heritage items or material collected during the test excavations or salvage works;	Section 5.5.2
	vii) ensuring workers on site receive suitable heritage inductions prior to carrying out any development on site, and that records are kept of these inductions;	Section 6.3
	viii) ongoing consultation with RAPs during the implementation of the ACHMP;	Section 3.3.2

Condition No. Condition Requirement		Section Reference
	ix) preparing Aboriginal Site Impact Recording Form/s (ASIRFs) for all Aboriginal heritage sites following construction activities with ASIRFs to be submitted to the Aboriginal Heritage Information Management System (AHIMS) registrar.	Section 5.6 Section Appendix 3
	e. include a contingency plan and reporting procedure including: i. an Unexpected Heritage Finds and Human Remains Procedure prepared in relation to Aboriginal Cultural heritage, with these measures to be prepared in accordance with the guidelines and standards specified by Heritage NSW, be implemented for the duration of the project and to include the requirement to register any newly identified Aboriginal objects or sites in the AHIMS database.	Section 5.4
	f. include a program to monitor and report on the effectiveness of these measures and any heritage impacts of the project.	Section 6.0
B57	Upon the completion of Aboriginal cultural heritage test and salvage excavations, an Aboriginal Cultural Heritage Excavation Report (s), prepared by a suitable qualified expert. The Aboriginal Cultural Heritage Excavation Report(s) must: a. be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, 2010; and b. document the results of the archaeological test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds) c. The RAPs must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, and the relevant Local Aboriginal Land Council, and the RAPs within 24 months of the completion of the Aboriginal archaeological collections and excavations (both test and salvage).	Section 5.6
C35	All reasonable steps must be taken so as not to harm, modify or other impact Aboriginal objects except as authorised by this approval.	Section 5.2
C36	The Registered Aboriginal Parties (RAPs) must be kept informed about the SSD. The RAPs must continue to be provided with the opportunity to be consulted about the Aboriginal Cultural heritage management requirements of the SSD.	Section 3.3.2

2.2 Statutory Context

Legislation and its relevance to the Project is summarised in **Table 2.2**. Further details of statutory obligations relating to Aboriginal cultural heritage is provided in **Appendix 3**.

Table 2.2 Commonwealth and State Legislation Relevant to the ACHMP

Legislation	Description	Relevant to the Project?	Details
Commonwealth			
<i>Environment Protection and Biodiversity Conservation Act 1999</i>	Recognises sites with universal value on the World Heritage List (WHL). Protects Indigenous heritage places with outstanding heritage value to the nation on the National Heritage List (NHL), and significant heritage value on the Commonwealth Heritage List (CHL).	No	There are no Indigenous heritage places within the project area that are listed on the WHL, NHL, or the CHL.
<i>Native Title Act 1993</i>	Administers rights and interests over lands and waters by Aboriginal people. Provides for negotiation and registration of Indigenous Land Use Agreements (ILUAs). Often used in NSW to identify relevant stakeholders for consultation.	No	No native title claim applications or determinations or Indigenous Land Use Agreements exist over the Project area.
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i>	Preserves and protects areas and objects of particular significance to Aboriginal people that are under threat from injury or desecration.	No	There are no areas or objects within the project area subject to a Declaration under the Act.
State			
<i>Environmental Planning and Assessment Act 1979</i>	Requires environmental impacts, including to Aboriginal heritage, to be considered in land use planning. Provides for the development of environmental planning instruments, including State Environmental Planning Policies and Local Environmental Plans.	Yes	The Project was assessed as a State Significant Development (SSD) and approval of this plan is required by DPHI.
<i>National Parks and Wildlife Act 1974 (NPW Act)</i>	Provides blanket protection for all Aboriginal objects and declared Aboriginal places. Includes processes and mechanisms for development where Aboriginal objects are present, or where Aboriginal Places are proposed for harm.	Yes	The NPW Act generally remains in force for the Project in relation to the discovery, impact notification and care of Aboriginal objects in NSW. However, as the Project is classed as SSD, an Aboriginal heritage impact permit (AHIP) is therefore not required to permit harm to Aboriginal objects associated with the Project. Instead, the SSD consent and an approved ACHMP serve as an approval to impact on and manage impacts to Aboriginal objects associated with the Project Area.

2.3 Regulator Consultation

CoA B56 (b) requires this plan to be prepared in consultation with Heritage NSW. The ACHMP will be provided to Heritage NSW for review through the DPHI Major Projects portal and their comments addressed. Correspondence with Heritage NSW will be attached to the ACHMP as **Appendix 2**.

3.0 Aboriginal Consultation

3.1 Registered Aboriginal Parties

There are 17 Aboriginal parties registered for the Project and are listed in **Table 3.1**. The RAPs were identified, registered and consulted as part of the ACHA (Umwelt 2024).

Table 3.1 List of Project RAPs

Organisation	Contact name	Phone	Email
ADTOAC	Peter Leven	0405 149 684	peterleven@y7mail.com
AT Gomilaroi Cultural Consultancy	Aaron Talbott	0457 165 736	ngurrugu74@outlook.com
Didge Ngunawal Clan	Lilly Carroll	0426 823 944 0450 616 404	didgengunawalclan@yahoo.com.au
Long Gully Cultural Services	Ethan Trewlynn	0401 424 853	Ethan3trewlynn@gmail.com
Gomery Cultural Consultants	Leanne Kirkman	0458 532 707	leannekirkman1964@gmail.com
Jarban & Mugrebea	Les Atkinson	0466 316 069	Les.atkinson@hotmail.com
Murra Bidgee Mullangari Aboriginal Corporation	Darleen Johnson	0490 051 102 0475 565 517 0497 983 332	murrabidgeemullangari@yahoo.com.au
Nukara Indigenous Cultural & Heritage	Olivia Connors	0493 550 687 0450 137 512	cmcdougall49@yahoo.com
Thomas Dahlstrom	Thomas Dahlstrom	0403 529 119	gamila_roi@yahoo.com.au
Widescope Indigenous Group	Donna Hickey/ Steve Hickey	0425 230 693 0425 232 056	Widescope.group@live.com
Worimi Traditional Owners Indigenous Corporation (Worimi TOC)	Candy Towers	0412 475 362	worimitoc@hotmail.com
A1 Indigenous Services	Carolyn Hickey	0411 650 057	Cazadirect@live.com
Awabakal LALC	Brent Ellis	(02) 4965 4532	reception@awabakallalc.com.au brent.ellis@alalc.com.au
Kevin Duncan	Kevin Duncan	0431 224 099	kevin.duncan@bigpond.com
Awabakal Traditional Owners Aboriginal Corporation	Kerrie Brauer	0412 866 357	Kerrie@awabakal.com.au
Lower Hunter Aboriginal Incorporated	David Ahoy	0421 329 520	lowerhunterai@gmail.com
Awabakal & Guringai	Tracey Howie	0412 866 357 0404 182 049	tracey@guringai.com.au; kerrie@awabakal.com.au

3.2 Previous Consultation for the Project ACHA

The *Aboriginal Cultural Heritage Consultation Requirements for Proponents* (DECCW 2010a) were followed for the ACHA. RAPs were invited to provide cultural information about the Project, were provided with draft assessment and fieldwork methods for review, were kept consulted about Project updates and management and were provided with assessment documentation for review and comment.

The consultation period for the preparation and finalisation of the ACHA took place between September 2023 and March 2024. Further details about this process is document in the ACHA (Umwelt 2024).

3.3 Consultation in Developing this Plan

3.3.1 Original Version April 2025

In accordance with CoA B56(b), Umwelt has consulted RAPs in developing this plan. Aboriginal consultation for this ACHMP was approached in a manner consistent with the requirements set out in the *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010* (DECCW 2010a). Consultation was undertaken with existing RAPs, who have been involved in the consultation process since the preparation of the ACHA (Umwelt 2024). Documentation of the consultation process, correspondence and its outcomes is included in **Appendix 2**.

Umwelt issued a draft of the ACHMP to RAPs on 17 April 2025 via email that offered a 28-day review period for RAPs to provide feedback. This was followed by a reminder about the review period on 7 May 2025. **Table 3.2** provides a summary of RAP feedback, responses to feedback, and where relevant, references to where the ACHMP has been updated to address the feedback. **Appendix 1** includes original copies correspondence.

Table 3.2 RAP Feedback on Draft ACHMP

Summary of RAP Feedback	University of Newcastle Response
Didge Ngunawal Clan	
Email response expressed that Didge Ngunawal supports the draft ACHMP.	No response required.
Long Gully Cultural Services	
Email response expressed that Long Gully Cultural Services supports the draft ACHMP.	No response required.
Jarban & Mugrebea	
Email response expressed that Jarban & Mugrebea supports the draft ACHMP.	No response required.

Summary of RAP Feedback	University of Newcastle Response
Kevin Duncan	
Email response which opposed the identification of the Worimi as Traditional Owners of the Newcastle district. He requested that the reference to Worimi be removed, in the context of being Traditional Owners. No further comments were provided.	The inclusion of the Worimi people as Traditional Owners in Newcastle is consistent with the position of the University of Newcastle. In order to align with the University's position, no changes will be made to the in-text reference in the cover pages of this document.
Awabakal Traditional Owners Aboriginal Corporation	
Email response which raised concerns regarding the wording of the Acknowledgement of Country. The current Acknowledgement of Country, states <i>"The University of Newcastle acknowledges the traditional custodians of the lands within our footprint areas: the Awabakal, Darkinjung, Biripai, Worimi, Wonnarua and Eora Nations"</i> . Kerrie has expressed that this is inappropriate, given that Newcastle, and subsequently the Project, is located within Awabakal Country.	The University of Newcastle has amended the wording of the Acknowledgement of Country in order to clarify that the wording is inclusive of additional University sites, outside of the current Project Area. Further correspondence with ATOAC sought to clarify this and ensure that the re-wording was suitable.
Awabakal Descendants Traditional Owners Aboriginal Corporation	
Email response outlining that ADTOAC support the draft ACHMP. Peter Leven further provided comment regarding Section 5.5 Management of Salvaged Aboriginal Objects, of the draft ACHMP: <i>Any recovered Cultural material is to be reburied in a Culturally appropriate manner onsite following any scientific analysis.</i> Additional correspondence via the phone further expanded upon the potential use of any identified artefactual material in the heritage interpretation of the Project Area. Peter Leven expressed that whilst it would be beneficial to the wider Newcastle community to engage with identified cultural artefacts, the risks associated with a public setting and public accessibility of the site would necessitate strict controls. Peter put forward a suggestion to create 3D printed models of any identified artefactual material, to be incorporated into any future interpretation plans. This approach would allow for the repatriation of all cultural material on site, as previously discussed.	Section 5.5.2 details a process to identify and implement appropriate long-term management of any recovered artefacts. This process allows for flexibility and requires further consultation to resolve final long term arrangements.

3.3.2 Revision 1 August 2025: Ground Improvement Works

The ACHMP has been updated in August 2025 in response to proposed additional ground improvement works within the Project Area involving the use of rigid inclusions to enhance ground stability. **Table 1.1** in **Section 1.2.2.2** provides further detail about the nature of this activity.

Umwelt issued a revised draft of the ACHMP to RAPs on 14 August 2025 via email that offered a 14-day review period for RAPs to provide feedback. This was followed by a reminder on 28 August 2025. Table 3.3 provides a summary of RAP feedback, responses to feedback, and where relevant, references to where the ACHMP has been updated to address the feedback. **Appendix 1** includes original copies correspondence.

Table 3.3 RAP Feedback on Revised ACHMP

Summary of RAP Feedback	University of Newcastle Response
Worimi TOC	
Email response expressed that Worimi supports the revised ACHMP.	No response required.
A1 Indigenous Services	
Email response expressed that A1 Services supports the revised ACHMP.	No response required.
Murra Bidgee Mullangari Aboriginal Corporation	
Email response expressed that Murra Bidgee Mullangari Aboriginal Corporation supports the revised ACHMP.	No response required.
Thomas Dahlstrom	
Email response which confirmed the revised ACHMP was received. No further comments were provided.	No response required.

The ground improvement works were not reflected in the original ACHMP and therefore additional consultation was undertaken to notify RAPs of the proposed changes; develop an updated version of the ACHMP that accounts for the ground improvement works; and allows for appropriate revised management measures.

On 7 August 2025, a preliminary meeting was held by University of Newcastle and the RAP representatives undertaking archaeological works (ADTOAC, Worimi TOC and Awabakal LALC) to discuss the ground improvement works.

Through consultation it was acknowledged that the ground improvement works would result in an increase to the Project's cumulative impact on the archaeological deposit of 'UoN PAD 1' (AHIMS #38-4-2024). Despite the proposed augering method involving displacement rather than removal of soils, the activity would still have the potential to harm Aboriginal objects. RAPs expressed their desire for the additional impact/harm to be mitigated but recognised that there was not a reasonable method available to respond to individual 35 cm diameter auger locations in a controlled archaeological way¹. Instead RAPs expressed their desire for the impact of the ground improvement works to be offset by allocating more scope to open area excavation without the requirement to excavate strictly where Project ground disturbing activities are proposed. Umwelt agrees that this method would be more valuable from an archaeological perspective as it could better address the archaeological research aims to best characterise the local deposit and explore the nature of the original Hunter River Shoreline via potentially a linear trench(es) of 1 m x 1 m pits that span from the foreshore and into the shoreline.

To account for the above discussion, Umwelt has updated the archaeological mitigation measures in **Section 5.2** with the following key changes:

¹ For example, monitoring of augered soil at each would result in a mixed/disturbed deposit with no vertical integrity to recovered archaeological material.

- Allowance for open area salvage excavation to increase from 40 m² to 54 m². This calculation has been made to directly offset the 144 x 35 cm auger locations within the mapped Hunter River Shoreline which equates to 13.8 m².
- Allowance for the above additional excavation to extend beyond the pile and trench locations to best characterise the local deposit and explore the nature of the original Hunter River Shoreline.

3.4 Ongoing Consultation Required for the Project

The RAPs will continue to be consulted on matters of Aboriginal heritage management for the Project. Primary communication will be via letter which may be emailed or posted depending on RAP preferred means of communication. Issues raised in conversations, whether by telephone or in person, should be documented in a letter by the person raising the issue within a reasonable time of the conversation.

Table 3.4 provides the required Aboriginal consultation to be implemented prior to, and during Project development activities. Any Aboriginal consultation undertaken as part of these activities should be documented in **Appendix 2**.

Table 3.4 provides a list of dates that are culturally sensitive, and when works requiring Aboriginal heritage input and/or participation should be avoided where possible.

Table 3.4 Aboriginal Consultation to be Undertaken as part of the Current Project

Project stage	Activity	Type and preferred method of communication	Comment or notification period to be provided
Pre-construction	Development of ACHMP	Provision of a draft copy ACHMP to RAPs for review and comment.	4 weeks (28 days)
	Finalisation of ACHMP	Provision of final report via e-mail and/ or post prior to its implementation.	Within 2 weeks (14 days) of ACHMP approval
Pre-construction and construction	Updates to the ACHMP	Initial notification via phone/e-mail to advise of proposed update. Provision of updated ACHMP for review and inputs via e-mail and/or post. Where significant changes are proposed, an on-site meeting with RAPs is recommended.	2 Weeks
Pre-construction and construction	Aboriginal site management measures	University of Newcastle will consider expressions of interest from suitably skilled, equipped and insured Aboriginal persons to provide Aboriginal cultural heritage management services. Successful applicants will be invited to provide a fieldwork representative(s) to participate in Aboriginal heritage management tasks described in Section 5.0 of the ACHMP. Depending on the scope of specific management tasks, RAP field representatives may be required to work to a roster. Fieldwork management tasks will include one project archaeologist (as required) and will work in accordance with this plan.	1 week

Project stage	Activity	Type and preferred method of communication	Comment or notification period to be provided
	Significant cultural unexpected finds	Contact all RAPs via phone and/or e-mail to advise of any significant cultural unexpected finds and proposed management. This will include invitation to undertake on-site observations and/or meetings where significant cultural materials, such as human remains are discovered. Refer to Section 5.4 for new finds procedures.	Within 2 days of find

Table 3.5 Culturally Sensitive Dates Applicable to the Project

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, culture and achievements. Aboriginal people are often committed to activities during this week and will often be unavailable.

4.0 Aboriginal Cultural Heritage Context and Sites

4.1 Summary of Aboriginal Cultural Heritage

Umwelt (2024) prepared an ACHA to inform the Project EIS. This included Aboriginal community consultation, desktop studies, a visual inspection and an evaluation of the potential Aboriginal cultural heritage values of the Project Area.

This assessment, in addition to prior archaeological investigations completed within, or in proximity to, the Project Area (see Curio 2018, Curio 2020 and Umwelt 2021), identified that the original shoreline of the Hunter River, and associated dune landforms, likely intersect with the south-eastern portion of the Project Area. An overview of the Aboriginal cultural heritage context for the Project Area is as follows:

- Curio Projects (2018) prepared an ACHA for Stage 1A (Q Building) Enabling Works. The key findings of the ACHA were that the original Hunter River shoreline would have extended approximately northeast to southwest through the City Campus Student Accommodation Development Area, which includes the south-eastern portion of the current Project Area. The ACHA predicted that in-situ deposits are likely to be present where intact original soil profiles remain. The ACHA predicted that there is moderate to high potential for intact Aboriginal archaeological deposits to be present where natural remnant soil profiles exist within the original Hunter River shoreline. The assessment recommended salvage excavations and Aboriginal community collection measures, which were submitted as part of an AHIP application to impact 'UoN PAD 1' (AHIMS #38-4-2024). Heritage NSW issued AHIP #C0005145 for the Stage 1A Enabling works and associated salvage excavation and Aboriginal community collection.
- Curio Projects (2020) completed an archaeological excavation and community collection program under AHIP #C0005145. Community collection of 'UoN1A-1' included the recovery of complete flakes (n=6), a broken flake (n=1), flaked pieces (n=2), angular fragments (n=2), one core and one core fragment. The purpose of the archaeological program was to determine the location of the original shoreline and the boundary of reclaimed land, and to characterise the nature and extent of subsurface deposits of 'UoN PAD 1' (AHIMS #38-4-2024). A total of 38 test pits were excavated as part of the archaeological works, none of which were conducted within the current Project Area. In total, 1,692 Aboriginal stone artefacts were recovered throughout 24.5 m² of excavations, the majority of which were identified within the deeper B horizon (coarse sand with gravel and shell inclusions, 1,500–2,100 mm depth), within approximately 150 m of the original shoreline. Natural soil profiles were encountered on average at depths of 400–500 mm and basal depth was reached at 1,600–1,700 mm. Excavations confirmed the location of the original Hunter River shoreline within the scope of the works, consistent with the location predicted through historical overlay mapping.

- Umwelt (2021) undertook archaeological monitoring of a geotechnical/contamination testing program under AHIP #C005145 within the City Campus Student Accommodation Development Area. The monitoring works indicated that the north-western portion of the current Project Area is situated upon primarily historical fill associated with the historical reclamation of the shoreline in the 1850s. Natural sands were identified at depths of 500–700 mm within or directly adjacent to the current Project Area, which was interpreted as having the potential to feature Aboriginal objects at that depth and below. Although the monitoring and testing program only recovered minimal archaeological results (i.e. only 14 artefacts were collected in total and outside of the current project area), the results of the program provide further clarification on the location of the original Hunter River shoreline. All recovered artefacts were clearly within the original shoreline area mapped on AHIP documentation.
- More recently from December 2024 to April 2025, Umwelt and RAP representatives for AHIP #C005145 have been undertaking archaeological salvage measures as part of Aboriginal Community Collection Works related to Stage 1 Enabling Works for the University of Newcastle Honeysuckle City Campus Development 1A². These works are being undertaken under Variation #3 issued for AHIP #C005145 on 10 September 2024. This has involved monitoring works within and adjacent to the current Project Area. Of note, excavation for enabling works directly abutting the south-eastern corner of the Project Area has revealed that the local archaeological deposit can occur from ~500 mm depth below current ground level and its relatively intact if not subjected to localised historical disturbance. Notably, the archaeological bearing layer only continued to ~1.2 m depth below current ground level, and beyond that depth, bleached culturally-sterile B horizon sands continue to an undetermined depth. Overall, Umwelt considers these findings are the most relevant to the Project due to their proximity and similar findings are most likely to apply to within the Project Area within the Hunter River shoreline.

Overall, the archaeological context of the Project Area indicates that the shoreline and associated foredune landforms are highly likely to contain significant archaeological deposits. The potential for archaeological material is directly linked to the former shoreline and the impacts of historical disturbance. The primary finding relevant to the Project Area is that excavation activities in areas where natural sands occur (i.e., in areas confirmed to be within the original shoreline) can impact Aboriginal archaeological deposits starting at between ~400–500 mm.

As illustrated in **Figure 4.1**, the western and north-western portion of the Project Area is likely to be almost exclusively beyond the original shoreline and on reclaimed land, and based on the results of prior archaeological investigations, is likely to contain upwards of 1.5 m of historical fill before encountering the original submerged river floor. The potential for undisturbed/in-situ archaeological deposits beyond the shoreline/seaward is entirely diminished because it is historical modified terrain. There is some residual potential for ex-situ archaeological material in reclaimed land, but its quantity and provenance would be indeterminable and therefore have low archaeological significance/value.

² Works are in progress and analysis and reporting is yet to be completed.

FIGURE 4.1
AHIMS Sites and Original
Shoreline/Landform
Sensitivity



4.2 Aboriginal Sites Subject to this ACHMP

Only one site, 'UoN PAD 1' (AHIMS #38-4-2024), is relevant to this ACHMP. It comprises a subsurface archaeological deposit of unquantified geographic extent that represents the original shoreline and dunes of the Honeysuckle locality. **Section 4.1** provides further detail about previous investigations of this site and its known characteristics. The Project ACHA concluded that the archaeological deposit within the Project Area may have moderate to high archaeological potential.

The extent of Project related impacts on 'UoN PAD 1' was not determined during the ACHA because the Project ground disturbance footprint had not been defined, and that archaeological test excavations did not occur. Overall, it was concluded that the Project would result in partial impact/destruction of the deposit because archaeological material associated with 'UoN PAD' 1 is known to extend beyond the Project Area boundary.

Overall, Project ground disturbance activities that extend deeper than historical fill (i.e. beyond 400 mm depth) within the original Hunter River shoreline have high potential to impact intact and/or disturbed portions of the 'UoN PAD 1' site. Whereas, Project ground disturbance activities beyond the shoreline have residual potential to impact disturbed/imported archaeological material but such areas are considered to be of low archaeological potential.

There are two registered Aboriginal sites 'UoN1A-1' (#38-4-1968) and 'Artifact scatter' (#38-4-2008) within 100 m of the Project Area (**Figure 4.1**), but these will not be impacted and are not considered sites requiring management under this plan.

5.0 Aboriginal Heritage Mitigation and Management

5.1 Overview

Aboriginal site management for 'UoN PAD 1' (AHIMS #38-4-2024) will take the form of mitigated impacts through archaeological excavation and Aboriginal Community Collection, but only within the original Hunter River shoreline inclusive of buffers as shown in **Figure 4.1**. Unmitigated impacts to 'UoN PAD 1' (AHIMS #38-4-2024) will apply for all areas outside of the original Hunter River shoreline and its buffers – this however excludes Unexpected Sites or suspected human remains (refer to **Section 5.4**).

This section also includes ongoing general post-approval heritage requirements are required during construction and operational phases. These are outlined in this section and include the management of all salvaged Aboriginal objects protocols in the event that unexpected cultural materials are found.

5.2 Archaeological Mitigation Measures

5.2.1 Rationale

The archaeological mitigation measures for 'UoN PAD 1' (AHIMS #38-4-2024) has been prepared with reference to the preliminary methodology presented in the Project ACHA (Umwelt 2024, Section 10.2), and revised to respond to detailed Project design. Project construction activities that trigger consideration for archaeological mitigation are:

- any works that require excavation below the current ground level to a depth greater than ~400 mm³, and
- is within (i.e. landward from) the mapped original Hunter River shoreline including its buffers as illustrated in **Figure 4.1** (i.e. in the area of moderate to high archaeological sensitivity).

The guiding principle behind the archaeological mitigation measures are that they should not result in additional impacts to Aboriginal objects beyond the total disturbance area of the Project. As such, Umwelt has reviewed Project construction plans to identify the types of proposed ground disturbing activities and then developed archaeological methods in response to the size and nature each activity. It is important to note that the ground disturbing activities with potential to intersect with the archaeological deposit represents only a minor proportion of the building layout and relates to ground improvement works, structural support (i.e. piling) and trenches for utilities.

As outlined in **Section 1.2.2.2**, the ground disturbing activities present a range of trenches, piles and augers distributed across the Project Area, including those within the original Hunter River shoreline and those that dissect the Hunter River shoreline into reclaimed land. The layout of these activities provide the opportunity to archaeologically investigate a range of landscape variables to address an overarching aim to better understand the boundary and archaeological characteristics of the original Hunter River shoreline/foreshore and how it transitions into reclamation fill (as noted in Section 10.2 of the Umwelt ACHA 2024).

³ This is based on minimum potential depth of the local archaeological deposit within natural sands.

The nature of the proposed ground disturbing activities presents limitations to how they can be approached archaeologically. For example, narrow and linear service trenching required for electrical conduits and stormwater present safety and practical constraints (i.e. inability to enter physically for manual excavation) and therefore are better suited to Aboriginal Community Collection methods such as monitoring and sieving identified deposits. The Aboriginal consultation process has identified that the local Aboriginal community place high importance on the archaeological materials in the local areas, regardless of its method of retrieval. Such methods are consistent with the methods employed for similar service trenching activities associated with the enabling works under AHIP #C005145 (refer to **Section 4.1** for context).

In balance to the above, other ground disturbing activities present opportunities for investigation in a systematic and archaeological manner using best practice methods. For example, the layout of proposed piling presents a grid spread across the Project Area within the mapped original Hunter River shoreline. Archaeological excavation of these locations can aim to map the distribution of archaeological material across the original Hunter River shoreline and better refine the buffers applied to the shoreline mapping. Furthermore, areas of wider excavation (such as pile caps/beams, lint traps, grease arrestor) present opportunities for archaeological testing, followed by salvage if certain archaeological triggers are met.

Overall, the proposed mitigation measures present an opportunity to gather a representative sample of the local archaeological record through best practice archaeological methods to address research questions, while also providing the Aboriginal community the opportunity to collect cultural materials through archaeological monitoring/sieving.

5.2.2 Aims and Research Questions

5.2.2.1 Aims

The mitigation program has the following aims:

- Confirm the alignment of the Hunter River shoreline and investigate the extent to which it was impacted during historical reclamation activities. The Project provides a unique opportunity to investigate Project Area that is centred on the transition from the original Hunter River shoreline into historical reclamation fill.
- To characterise the archaeological deposits relating to past Aboriginal occupation of the local area through excavation and environmental analyses (where applicable). This may include greater understanding of resource exploitation; identification of any change through time in spatial and chronological phases of activity; and site formation processes.
- To recover a representative sample of the assemblage from 'UoN PAD 1' which may inform further understanding of how Aboriginal people accessed resources and manufactured stone artefacts in the shoreline environment of Newcastle's main waterbody.
- To use a sample of the recovered artefacts for educational and interpretative purposes in a culturally appropriate way guided by the Aboriginal community.

Research Questions

- Does the Project Area contain subsurface Aboriginal cultural material/objects and what is the level of stratigraphic integrity?
 - What does the identified assemblage reveal about past Aboriginal land use?
 - Is the identified cultural material able to provide further information regarding the types of activities that Aboriginal people were undertaking within the area?
 - Is it possible to define discrete areas of activity and/or variability in the nature of occupation based on the artefact assemblage and distribution of artefact frequencies across the sampled areas?
- Is the assemblage able to provide information on how past Aboriginal land use changed through time and during variations in environmental conditions?
- What is the age of the subsurface archaeological deposit?
- How does the identified material and its distribution from a distinct shoreline deposit compare to the evidence recovered from larger archaeological excavations in the local area for which data is available, namely the Newcastle Bus Interchange (Umwelt 2021b), Newcastle Interchange and Light Rail excavations (Umwelt, 2020), Newcastle East End excavations (Umwelt 2017 and 2019), and enabling works under AHIP #C005145 (Umwelt 2021a). Do shoreline deposits have unique characteristics when compared to nearby sites set back (e.g. 100 m to 200 m) from the shoreline?
- How should the cultural materials be conserved and managed in future?

5.2.3 Archaeological Excavation Program (Applicable to Piling Works and Wider Disturbance Areas)

5.2.3.1 Definitions and Triggers

The archaeological excavation program primarily relates to the ground disturbing activities where archaeological controls can be implemented prior to construction activities. This is applicable to piling locations (900 mm diameter each) and Wider Disturbance Areas (i.e. pile caps/beams and lint traps) that are within the original Hunter River shoreline including its 10 m buffer. These areas are shown on **Figure 5.1**.

This method also includes provisions for additional open area excavation outside Wider Disturbance Areas to offset the 14 m² total area of additional ground disturbance from ground improvement augering within the original Hunter River Shoreline.

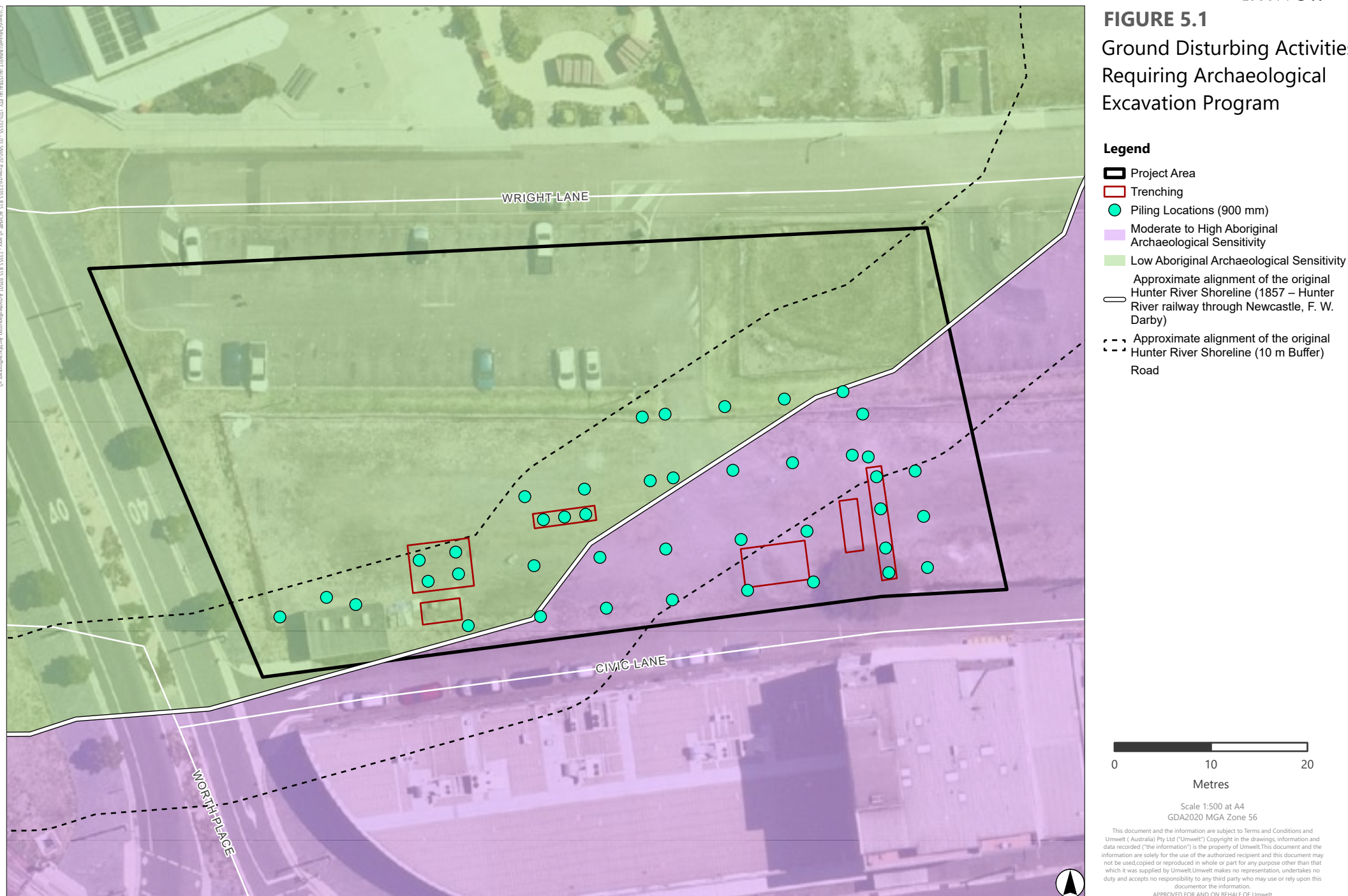
Methods to address the other ground disturbing activities of narrow and linear service trenching required for electrical conduits and stormwater are addressed under Aboriginal Community Collection methods in **Section 5.2.4**.

The archaeological excavation program will apply to:

- any works that require excavation below the current ground level to a depth greater than ~400 mm⁴, and
- is within (i.e. landward from) the mapped original Hunter River shoreline including its buffers as illustrated in **Figure 4.1**.

⁴ This is based on minimum potential depth of the local archaeological deposit within natural sands.

FIGURE 5.1
Ground Disturbing Activities
Requiring Archaeological
Excavation Program



5.2.3.2 Phase 1: Establishment of Hunter River shoreline and Archaeological Deposit

The purpose of Phase 1 is to establish the boundaries of the Hunter River shoreline and presence of archaeological deposit prior to implementing archaeological test pitting and/or salvage measures. This will require monitoring the machine removal hardstand features and historical fill above the ground disturbance locations until the presence of the archaeological deposit is verified, followed by archaeological excavation.

Phase 1 involves the following method:

- Monitoring will be completed by an archaeologist and may involve the assistance of RAPs as required.
- Monitoring will commence after the targeted removal of pavement and/or other hardstand.
- The monitoring will involve the inspection of trenching/excavation machinery to identify the transition from fill material into the natural sand deposit, if present (i.e., as per the descriptions of the Hamilton soil landscape in Matthei 1995). If the natural sand deposit is not encountered, machine excavation will continue until whichever comes first:
 - the water table is encountered⁵, or
 - where depth of Project impact has been reached, or
 - 2 m depth is reached.
- The archaeologist will guide the excavator operator to stop excavation prior to impacting the natural sand deposit. This will involve implementing approx. 100 mm controlled scrapes once ~400 mm of fill/overburden has been removed. The archaeologist will aim to retain a thin layer of interface between the historical fill and the sand deposit so that the potential archaeological deposit is not impacted by the machine.
- All excavated fill/overburden material above the natural soil does not require sieving and may represent an unacceptable health risk due to potential contamination.

At the completion of the Phase 1 machine excavation, the archaeologist will have a refined understanding of the Hunter River Shoreline and presence of archaeological deposit. It is likely that the some or all of the excavated locations within the seaward 10 m buffer of the Hunter River shoreline will not contain archaeological deposit and represent only reclamation fill. The outcome of Phase 1 will be a refined list of areas that will require Phase 2 investigations.

5.2.3.3 Phase 2: Test Excavation

Archaeological test excavation will be undertaken for each of the locations established to contain natural sand deposits through Phase 1. The approach to testing will respond to the nature of ground disturbing activities.

⁵ Observations from the enabling works under AHIP #C005145 show that the high tide mark of water table occurs at 1.5 m depth, which is below the archaeological bearing layer.

The excavation method is as follows:

- Pile locations (excluding pile cap/beam locations) which have a diameter of 900 mm will have a 1 m x 1 m excavation unit placed over them. The exact pile locations will be marked by a surveyor prior to excavation to ensure that the archaeological excavation responds only to the piling footprint. The 1 m x 1 m unit will cover the 900 mm diameter piling footprint in its entirety including a buffer margin to account for the square nature of archaeological pitting.
- Broader disturbance areas (pile cap/beams, lint traps and grease arrestor) will have 1 m x 1 m test pits laid out at 5 m intervals within the proposed disturbance area. Note that if the proposed disturbance area is less than 5 m in length, then only one test pit will occur at that location.
- Each test pit will be excavated in 10 cm spits or stratigraphically (if stratigraphic layers are visible).
- Excavations will be undertaken manually to a maximum safe depth of 1.2 m from ground level. If required, excavations will occur mechanically beyond this depth but within limits where the integrity of excavation results are not compromised (for example, excavation will be discontinued if there is potential for collapse of trench walls) or utilising suitable shoring mechanisms to allow for continued manual hand excavation. However, on observations from enabling works under AHIP #C005145, it is unlikely that excavation will be required beyond 1.2 m as culturally sterile layers are typically met by this level.
- Excavations will cease where one or more of the following criteria are established:
 - It is deemed unsafe to continue to excavate because of risk of collapse or water ingress
 - If the excavation has continued past the depth of deposits containing cultural material (sterility)
 - Where the depth of Project impacts has been reached
 - If unexpected obstructions are met that do not allow the excavation method to be implemented.
- Photographs and/or drawings should be captured from a consistent perspective throughout the project. The specific viewpoint, such as displaying the northern profile, should be determined at the discretion of the project archaeologist(s).
- Excavated soils will be dry-sieved using minimum 5-millimetre aperture wire-mesh sieves, with the exception of features such as hearths or heat treatment pits whereby smaller aperture sieves may be employed. Hand or mechanical sieving methods are appropriate.
- Soil samples may be collected for description, sedimentological and chronological analysis where such analysis is considered likely to contribute significant information. Optically Stimulated Luminescence (OSL) samples would be taken in areas where Aboriginal objects are found, and generally try to bracket the deposit (to provide a maximum and minimum age). Material for radiocarbon analysis may also be undertaken opportunistically if archaeological features containing charcoal or other dateable material are evident.
- Throughout the Phase 2 test excavations, a plan will be maintained showing excavation locations. Data will be collated on the findings of each excavation unit, such that the nature of the soil profile and any cultural material identified is documented. Preliminary artefact counts, information on raw material types and description of key artefact classes in the assemblage from each excavation unit will be documented. This information will be used to inform decision making on requirements for Phase 3 works, as discussed below.

- If features (including hearth or heat treatment pit or an accumulation of animal bone or shell likely to relate to Aboriginal cultural activities) are identified, the feature will be excavated in accordance with the methodology provided in **Section 5.2.3.6**.
- Should human/possible human skeletal material be identified (either in situ or in excavated spoil) within any excavated area, excavation activities in the immediate vicinity must cease immediately. The procedure provided in **Section 5.4.2** must then be followed.

5.2.3.4 Phase 3: Expansion Areas

Phase 3 excavations will apply as a priority to the Wider Disturbance Areas (pile cap/beams, lint traps and) where there are opportunities for expansion. Additionally, Phase 3 excavations can be applied to an upper limit excavation quota to address research aims while offsetting the cumulative impact from introducing augering for ground improvement works as discussed in **Section 3.3.2**.

A sample of up to 54 m² of manual excavation across the Project Area is proposed which is inclusive of the excavation completed during Phase 2 excavations. Additional excavation beyond 54 m² would only apply if archaeological features are identified (as per **Section 5.2.3.6**) during the Aboriginal Community Collection methods as set out in **Section 5.2.4** and the conditions meet safety requirements for manual excavation.

As a current estimate, once the Hunter River shoreline and archaeological deposit is refined during Phase 1 and the requirement for test pitting is excluded from a number of locations, it is likely that approximately half of the excavation effort will be allocated to Phase 2 excavations and half to Phase 3 excavations. However, note that the final ratios of test pitting to expansion areas will vary as guided by the results in the field.

Phase 3 works will focus on sampling areas where the Phase 2 works identified:

- comparatively high artefact densities to the test pit results, or
- uncharacteristic artefact types, namely:
 - grindstones
 - hammerstones
 - axes/hatchets
 - clusters of artefacts manufactured from raw materials other than Nobbys tuff (based on the assumption that Nobbys tuff is the most readily available raw material within the Newcastle region), or
 - where the assemblage contains an unusually high proportion of retouched artefacts or artefacts with obvious use-wear (based on comparisons with other excavation locations within the project area, unless otherwise agreed by the archaeologist and Aboriginal party representatives present on site).
- a cultural shell deposit/midden
- features such as hearths or heat treatment pits.

Phase 3 excavations will be undertaken in units of 1 m x 1 m. Phase 3 excavations would be conducted to allow for adequate excavation in the area surrounding Phase 2 units where the key requirements describe above are met. This means that Phase 3 units will be selected to provide the greatest likelihood of capturing the extent of the artefact distribution from Phase 2 that triggered the requirement for expansion.

Excavated materials (with the exception of sediments from features such as hearths or heat treatment pits) will be dry-sieved using 5-millimetre aperture wire-mesh sieves.

A plan will be maintained showing excavation locations and the outcomes of the Phase 3 excavations with reference to preliminary artefact counts, information on raw material types and description of key artefact classes in the assemblage from each excavation unit.

Continuation of the salvage excavations beyond the specified maximum of 54 m² would only be undertaken in consultation with the University of Newcastle and RAP field representatives. This would only apply in exceptional circumstances, such as if Unexpected Sites (as per definitions in **Table 5.1**) are identified and required additional excavation using archaeological methods, or if archaeological features are identified during Aboriginal community collection. Similar to Phase 2, identified features will be excavated in accordance with the methodology set out in **Section 5.2.3.6**.

5.2.3.5 Opportunities For Additional Collection

In the event that the 54 m² archaeological excavation quota is met and it is clear that the archaeological deposit continues within the proposed Wider Disturbance Areas, then the Aboriginal Community Collection methods as set out in **Section 5.2.4** may be implemented subject to the agreement between RAP representatives on site and the University of Newcastle.

5.2.3.6 Excavation of Features

Should a feature such as a possible hearth or heat treatment pit or an accumulation of animal bone or shell likely to relate to Aboriginal cultural activities be identified, the following methodology will apply:

- The surface of the feature will be cleaned by hand (using trowels, hand shovels and brushes as required) to allow the edges of the feature to be identified.
- The feature will then be excavated in cross-section (half-sectioned or part thereof depending on the location of the feature within the excavation unit and whether it extends outside the excavation unit) to investigate the dimensions and orientation of the feature to more accurately assess whether it is a cultural feature or the result of natural process (for example, a burnt tree root/stump or accumulation of bone within a former void). The excavation will proceed according to the stratigraphy (if any) of the in-filling materials.
- If it is identified as a feature, it will be photographed in cross-section and a stratigraphic profile of the cross-section will be recorded (where possible).
- If it is identified as a feature, it will then be excavated in its entirety within the excavation unit. All excavated cultural materials (including those from original cross-sectional excavation) will be retained for analysis and samples of relevant materials will be sent for additional analysis, including radio-carbon dating. If the feature extends outside the excavation unit, it will be further assessed whether excavation should continue into the adjoining area. This will be considered with reference to the need to maintain the integrity of the feature during excavation and/or backfilling if required.

- Excavation of any features will not be extended into areas that are outside of the Project ground disturbance limits unless it completed as part of additional open area excavation to offset ground improvement works and forms part of the 54 m² total excavation quota.
- Following the removal of all in-filling material, the remaining cut feature (where present) will be planned to scale and photographed.
- Following this excavation can resume in the remaining portion of the excavation unit.

5.2.4 Aboriginal Community Collection Method

5.2.4.1 Monitoring During Trenching

The narrow and linear service trenching required for electrical conduits and stormwater present safety and practical constraints (i.e. inability to enter physically for manual excavation) and therefore Aboriginal Community Collection via monitoring will apply to these ground disturbing activities under the following conditions:

- any works that require excavation below the current ground level to a depth greater than ~400 mm ⁶, and
- is within (i.e. landward from) the mapped original Hunter River shoreline including its buffers as illustrated in **Figure 4.1**.

These areas are shown on **Figure 5.2**.

The method will be consistent with the archaeological salvage measures employed for Aboriginal Community Collection Works related to Stage 1 Enabling Works for the University of Newcastle Honeysuckle City Campus Development 1A under AHIP #C005145 Variation #3.

The method will be as follows:

- Monitoring of earthworks will be completed by RAPs under the direction of an archaeologist as required. An archaeologist is not required to be present during all monitoring but must undertake regular inspections to ensure that the recording of monitoring results are accurately documented.
- Monitoring will commence after the removal of pavement and/or other hardstand.
- Monitoring will involve the inspection trenching/excavation machinery to identify the transition from fill material into the natural sand deposit.
- All excavated fill/overburden material above the natural soil does not require sieving and may represent an unacceptable health risk due to potential contamination, as the contractor has also noted asbestos in some of the overburden.

⁶ This is based on minimum potential depth of the local archaeological deposit within natural sands.

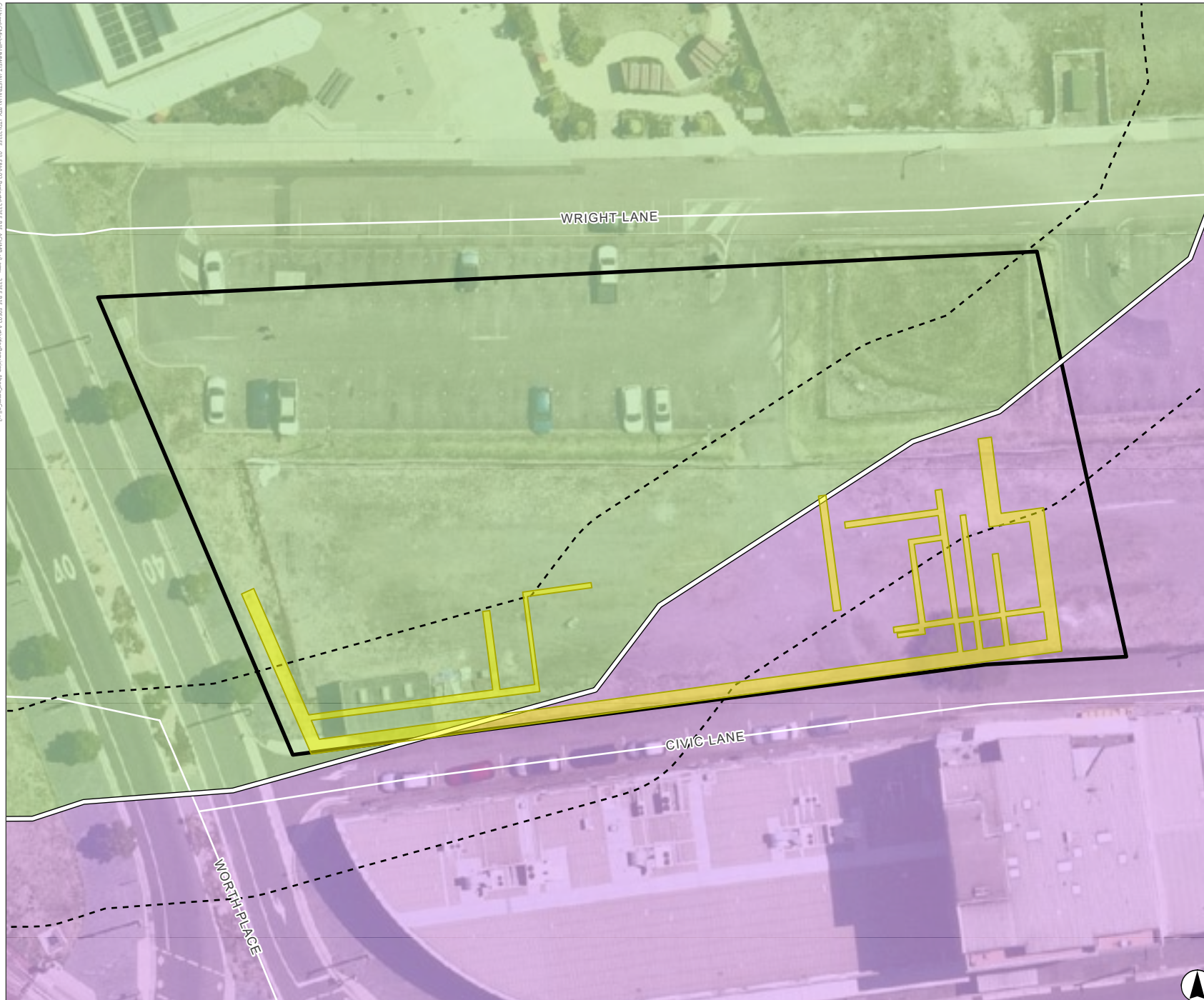
- When natural sand deposits are identified, mechanical excavation will proceed under supervision. Some level of archaeological control will be attempted, acknowledging the limitations of a mechanical bucket and excavator arm. Any sandy deposit will aim to be removed in 200–300 mm spits by 2 m length sections by the width of the subject trench. Any stratified deposits will attempt to be removed stratigraphically within the limitations posed by excavator arm and bucket. Material will be deposited next to the trench, or at another suitable location in consultation with the RAPs on site, and it will be placed in dedicated stockpiles according to their provenance for sieving.
- Excavated natural sand materials must be dry-sieved using 5-millimetre aperture wire-mesh sieves. Sieved spoil, once cleared by the archaeologist and with agreement by RAP representatives, can be returned to the excavated trenches during subsequent reinstatement activities.
- The Aboriginal community collection and archaeological monitoring would cease once excavation/s reach finished depth level, stabilised groundwater level, B-horizon clay subsoils and/or bedrock, and if the excavation has continued past the depth of deposits containing cultural material (sterility).
- Where accessible, representative drawings (plan and cross-sections) and/or photographs must be recorded for each soil profile identified.

If obvious and/or suspected/definitive archaeological features or deposits such as hearths, middens, earth ovens and/or heat treatment pits are identified, manual test excavation may be undertaken (in consultation with RAPs present on site) to characterise the identified materials/feature(s) and to determine the requirement for further archaeological excavation. Manual excavation of the feature will only be undertaken where excavation depths are less than 1.2 m below ground level to align with relevant New South Wales safety standards and will follow the method for excavating features as set out in **Section 5.2.3.6**. If manual excavation cannot be implemented due to inaccessibility of the trench, then machine excavation must apply under the direction of an archaeologist. Works can resume once the feature has been excavated.

FIGURE 5.2
Ground Disturbing Activities
Aboriginal Community
Collection

Legend

-  Project Area
-  Service Trenching
-  Moderate to High Aboriginal Archaeological Sensitivity
-  Low Aboriginal Archaeological Sensitivity
-  Approximate alignment of the original Hunter River Shoreline (1857 – Hunter River railway through Newcastle, F. W. Darby)
-  Approximate alignment of the original Hunter River Shoreline (10 m Buffer) Road



0 10 20
Metres

Scale 1:500 at A4
GDA2020 MGA Zone 56

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5.3 Contingency For Project Design Changes

If the layout or design of certain ground disturbing activities change from that provided in the figures in this report, then the relevant archaeological mitigation measures in this ACHMP still apply to those changes. Note that this does not allow for ACHMP measures to be applied outside of the Project Area.

5.4 New Finds Procedures

5.4.1 Management of New Finds and Unexpected Cultural Materials

This section sets out the measures in the event that any newly observed cultural material is identified during the pre-construction, construction and/or use of the Project Area. Importantly, the procedures set out in this section do not apply during the archaeological excavation activities set out in **Section 5.0** of this ACHMP, unless classed as an 'Unexpected Site'⁷ as specifically defined in the table below.

The recording of, and any proposed mitigation measures must be completed by a heritage professional(s) with participation of the RAPs representatives. 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. All sites that cannot be avoided must be assessed of their archaeological significance prior to impacts in accordance with best practice heritage guidelines.

Table 5.1 Management of New Finds and Unexpected Cultural Materials

Protocols to Follow
• All works within the location of the Aboriginal object/s must stop. • The person who identified the Aboriginal object/s must immediately notify the person in charge of the activity e.g., Construction Manager or delegate. • All construction that could potentially harm the Aboriginal objects or values must cease (including stopping all construction within at least 15 m). Only construction that is required to make the area safe is permissible. • The Aboriginal object/s is to be protected with the establishment of a no-go zone. • Contact the project archaeologist and RAPs to notify them of the find and then to lead the subsequent management of the find. • Consideration of avoiding the cultural materials should be undertaken. Where avoidance can be achieved, implement the following: ○ If in direct risk of impact apply active site management comprising fencing and signage, or if at indirect risk of impact apply passive management by demarcating the location by at least one high visibility peg, stake or other marker to alert persons to their location. All sites must be suitably recorded in accordance with AHIMS site card standards by a heritage professional and representatives of the RAPS. The site/s must be integrated into the cultural inductions to ensure all personnel are aware of the location and to avoid inadvertent impacts during the construction. • Heritage NSW will be notified of unexpected finds via writing.

⁷ **Unexpected Sites definition:** rarer site types and/or features not expected to occur in the Project Area (i.e., grinding grooves, engravings, stone arrangements, ceremonial sites and evidence of contact archaeology).

Protocols to Follow
Where Avoidance Cannot be Achieved:
Open Artefact Sites For sites of low to moderate archaeological significance, collection will be employed prior to Project impact. The collection will be undertaken by qualified archaeologist(s) and RAP representatives. The collection method will be as per: 1. Site coordinates for each site will be entered into mobile GPS devices to re-locate and confirm locations. 2. The general vicinity of each site location will be inspected by the field team. Stone artefacts will be flagged on the ground and a photo taken of the flagged site. Each flagged artefact will be marked as a waypoint in the GPS. 3. All artefacts will be collected into snap lock plastic bags or similar, marked with the project name, site name, collection date and waypoint number. If additional stone artefacts are identified during the artefact collection fieldwork, they will be managed in the same manner. 4. All artefacts will be sorted and recorded post-fieldwork with respect to technological type, implement type, raw material, maximum block length and weight. 5. The collected artefacts will be incorporated into a salvage report detailing the results of the fieldwork, the artefacts recovered at each site and GIS figures showing the artefact locations. 6. The Aboriginal Heritage Information Management System (AHIMS) records will be updated with a site impact recording form for each collected site. Any collection would require a report on the methods and outcomes collection and can be integrated into the salvage report required under this ACHMP.
Unexpected Site Types Unexpected Sites Definition: rarer site types and/or features not expected to occur in the Project Area: i.e. grinding grooves, engravings, stone arrangements, ceremonial sites, evidence of 'contact' archaeology - e.g., European materials such as glass or ceramic utilised to make traditional tools, and/or broken brick/earthenware used as hearth retainers. Heritage NSW will be consulted on the management of any Unexpected Site Type. As Unexpected Site Types have a very limited chance of being identified in the Project Area, no specific management methodology has been devised. If Unexpected Sites are identified and cannot reasonably be avoided: • A salvage method must be prepared by the Project archaeologist in consultation with RAPs and Heritage NSW. This may be established through an extraordinary meeting with RAPs or through letter correspondence with a reasonable timeframe for review. • For sites of high archaeological significance, or with potential to be of high archaeological significance through the identification of a significant PAD (as determined by the Project archaeologist in consultation with RAPs), archaeological excavation may be employed in general accordance with the Phase 2 and 3 excavation methods as set out in Section 5.2.3.3 and Section 5.2.3.4. Any salvage activity to such sites may require additional assessment and approvals as dictated by Heritage NSW and would require a report on the methods and results of the exercise.
Post Fieldwork Once the archaeological on-site activities are complete to the satisfaction of the heritage professional in consultation with the RAPs, construction activities may continue in the area in consultation with the RAPs. The Project archaeologist must provide written notification clearly specifying that construction activities may continue in the area of new finds. All archaeological activities should involve suitable analysis of cultural materials. Chronological, paleoenvironmental and sedimentological samples (if retrieved) should be suitably analysed and documented in a report that is provided to Heritage NSW. This may be integrated into the salvage report required under this ACHMP.

5.4.2 Discovery of Skeletal/Human Remains

If known or suspected human skeletal remains are encountered during the activity, the following procedure in **Section 5.2** must be adhered to:

Table 5.2 Procedure for the Discovery of Potential Aboriginal Ancestral Remains

Step		Actions
1.	Stop work and secure site	- All work must STOP in the vicinity of the remains. - The immediate vicinity will be secured to protect the find and the find will be immediately reported to the person in charge of the activity e.g., Construction Manager or Delegate who will immediately advise the site management. - A no-go zone will be established around the immediate area of the site. - Complete review of activities to enable compliance and continued operations.
2.	Notification to authorities and stakeholders	- The site manager should notify NSW Police of the discovery as soon as possible. All subsequent steps will be dictated by the NSW Police. - Contact the project archaeologist and RAPs to brief them on the developing situation. - If advised by Police, engage suitably qualified archaeologist or forensic anthropologist to assist Police in monitoring of skeletal material.
3.	Determination of the find and further notification	If it is determined that the skeletal material is of ancestral Aboriginal remains, RAPs must be contacted, and consultative arrangements will be made to discuss ongoing care of the remains. - Contact Heritage NSW (1300 361 967) and the NSW Environment Line (131 555) to notify them of the find, and Department of Planning and Environment. - Engage project archaeologist to assist and/or facilitate management of the Aboriginal ancestral remains with RAPs, APP and the UoN. Proceed to Step 4.
		If the skeletal material is not human, resume work. Ensure determination of non-human material is provided by relevant experts (e.g., Coroner or Police) before resuming work.
		If the remains are historic but non-Aboriginal human remains, the NSW Heritage Council (or delegate of the Heritage Council) will be consulted to determine requirements in accordance with the <i>NSW Heritage Act 1977</i> and relevant guidelines. Further actions are likely to require adherence with the following NSW Heritage Council guidelines: - Conservation Management Documents: Guidelines on Conservation Management Plans and other Management Documents - Skeletal Remains; Guidelines for Management of Human Skeletal Remains
		If the remains are non-Aboriginal and non-historic human remains, the University of Newcastle is to coordinate involvement of police. Works will not proceed until written approval is granted from relevant authorities.

Step	Actions
4. Initial planning and reporting if it is determined that the remains are Aboriginal ancestral remains.	- Aboriginal ancestral remains certificate to be submitted to the Police/Coroner to address the Coroners Act. - In consultation with RAPs, Heritage NSW and archaeologist, establish investigation area and any additional protocols to be adhered to during further investigation. The investigation will aim to establish whether any other burials are within or likely to occur nearby. Suitable methods could include controlled and monitored hand or machine excavation and/or non-invasive techniques such as geophysical techniques. - Engage an archaeologist to record the site and undertake significance and impact assessment of the burial site with RAPs and archaeologist. Site recordings must involve drawings and photography. Additional technical studies and samples may be taken with the consent of RAPs such as those for dating and biological information (e.g., age, sex and health of deceased). - Record burial site on AHIMs register, noting any restricted access requirements requested by RAPs.
5. Engagement with stakeholders to determine whether disturbance of the burial site(s) can be avoided.	- Explore and demonstrate options have been considered for site avoidance, if RAPs desire for the skeletal material to remain in-situ. - If the Aboriginal ancestral remains cannot be avoided: - Consult with RAPs, Heritage NSW and project archaeologist to facilitate recovery and reburial protocols and actions. Approval for recovery methods must be obtained by relevant authorities prior to any further movement of the remains - Recovery methods must include: - Exhumation in a controlled archaeological method and in consultation with RAPs and placed into a secure, temperate controlled storage location until a final reburial site can be identified - Access to the secure storage location containing any human remains will be managed and facilitated by Jemena in consultation with RAPs - RAPs will determine if further studies, media releases or other investigations are appropriate for the finds - Where required, APP and the UoN will help facilitate any culturally appropriate reburial or ceremonial methods. - Prepare report for Heritage NSW and RAPs on the outcome of relevant investigation, recovery and reburial outcomes. - Update ACHMP. - Works will not recommence until written approval is received from relevant authorities. If the Aboriginal ancestral remains can be avoided: - Develop appropriate management and mitigation measures in consultation with RAPs, Heritage NSW and project archaeologist. - Prepare report for DPHI, Heritage NSW and RAPs. - Update ACHMP. - Works will not recommence until written advice is provided from the Project archaeologist that the remains are suitably protected and away from Project impacts.

5.5 Management of Salvaged Aboriginal Objects

5.5.1 Temporary Storage of Salvaged Objects

Artefacts salvaged under the provisions of this ACHMP will be temporarily stored at the Umwelt Archaeology Office at 69 York Street, Teralba NSW.

Umwelt may temporarily release salvaged objects to qualified consultants for the purposes of analysis and reporting, providing that the consultant nominates the storage location, and that the location is safe and lockable.

5.5.2 Long-term Care of Salvaged Objects

The long-term management of salvaged Aboriginal objects is an aspect of cultural heritage management driven by the desires of local Aboriginal community. Salvaged Aboriginal objects are typically either stored in a long-term facility (known as a 'keeping place') or reburied on Country in an area that will receive long term protection from further development or other impacts.

Detailed provisions for the Aboriginal objects recovered as part of the Project mitigation measures are yet to be determined, primarily because no objects have been identified yet, and the number and characteristics of any salvaged assemblage is unknown. Instead, the management plan seeks to step out a process for how decisions will be made about long term management of the materials, including relevant consultation with RAPs and Heritage NSW. The provisions below are based on RAP consultation to date, whereby we have established that there is a desire for a portion of recovered material to be reburied within the Project Area, and possibly a portion of exemplary objects (or their replicas) to be placed on display within the proposed Student Accommodation Building (Site B) for educational and cultural purposes, while fostering cultural awareness about the rich Aboriginal history of the Honeysuckle area. The proposed process is as follows:

1. After completing the archaeological mitigation measures in **Section 5.2**, the assemblage will be reviewed and catalogued. The Project archaeologist will develop a shortlist of materials suitable for interpretation and display. The details of these will be shared with the University of Newcastle and RAPs and their suitability for display will be determined.
2. Details regarding display and interpretation of selected objects will be developed as part of the Project Interpretation Plan. Any matters relating to the interpretation and display of recovered Aboriginal objects will be made in consultation with RAPs. A draft of the relevant interpretation plan content/sections will be shared with RAPs for their review and comment within a **28-day** period.
3. If a selection of objects are to be placed on display, the University of Newcastle would prepare a Care Agreement application to be lodged with Heritage NSW for review and approval. The Care Agreement application would provide details of the proposed display and interpretation, a list of the Aboriginal objects nominated, and evidence of RAP consultation.
4. Upon receipt of approval of the Care Agreement, the University of Newcastle will implement the display and interpretation measures in accordance with the conditions of the Care Agreement.

5. The assemblage of objects that does not form a part of a Care Agreement (which may be all of the objects if none are determined for display) will be subject to reburial within a suitable location in the Project Area. The final location and protocols for reburial will be determined in consultation with RAPs, with a 28-day review period included.
6. The reburial activity will be undertaken in general accordance with Requirement 26 of the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, 2010*. However, the reburial vessel and materials used in this process may vary from this Code depending on the feedback from the Aboriginal community received in the step above. For example, the Aboriginal community may nominate natural or cultural materials to be used instead of plastics.

5.6 Post-fieldwork Analysis and Reporting

An Aboriginal Cultural Heritage Excavation Report will be prepared following the completion of the archaeological mitigation measures set out in this ACHMP.

The report will:

- Document the results of the archaeological mitigation measures set out in this ACHMP.
- Be provided to Registered Aboriginal Parties a minimum of 28 days to consider the report and provide comments before the report is finalised.
- 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 could 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. Artefact conjoining may also be attempted where sufficient cultural materials have been recovered.
 - Geochronology, including the processing and analysis of samples to inform the absolute age of the soil profile and/or cultural assemblage recovered. This would include Optically Stimulated Luminescence (OSL) ages, as well as radiocarbon samples, where 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.
 - Palaeo-environmental analysis, including palynology, phytolith analysis and/or charcoal analysis to explore the past vegetation and fire regimes that may have been 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.

- To comply with CoAs, the salvage report will:
 - a) Be prepared in accordance with the *Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, 2011* and the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, 2010*.
 - (b) Document the results of the archaeological test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds).
 - (c) The RAPs must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, and the relevant Local Aboriginal Land Council, and the RAPs within 24 months of the completion of the Aboriginal archaeological collections and excavations (both test and salvage).

An Aboriginal Site Impact Recording Form (ASIRF) will be lodged to document the impacts to the site on the AHIMS register. The ASIRF will make reference to the excavation report for further information.

6.0 Compliance, Training, Review and Improvement

6.1 Key Points

- This section provides information to ensure the ACHMP is complied with during the Project.
- Provides training requirements and processes and procedures to manage complaints and non-compliances.
- Criteria and timing for revisiting and updating the ACHMP is provided in this section.

6.2 Compliance and Auditing

6.2.1 ACHMP Implementation and Compliance Monitoring

Implementation and compliance with the plan will be monitored by standard environmental auditing procedures undertaken at regular intervals. The audit will include an assessment of compliance with development consent conditions and the objectives of the ACHMP.

Monitoring will be undertaken to measure/record the implementation of heritage management measures to address approval requirements. **Table 6.1** outlines how compliance will be monitored for the key management measures of this ACHMP.

Table 6.1 Compliance Monitoring

Item	Measure to Monitor Compliance
Archaeological mitigation measures implemented and appropriate management of salvaged materials (Section 5.0).	Include Project Archaeologist written sign-off to confirm that salvage measures are completed within an area before Project impacts can occur.
Reporting on test and salvage excavations (Section 5.6).	Documentation that the reporting for test excavation and salvage is provided to relevant parties and to RAPs for 28 days review according to reporting requirements set out in Section 5.6 .
Ongoing Aboriginal consultation requirements (Section 3.3.2).	An Aboriginal consultation log is prepared and maintained for the Project to document correspondence requirements.
Inductions are taking place and includes appropriate material.	The induction protocols set out in Section 6.3.1 will be managed by the Principal Contractor.
Reporting and managing any newly identified Aboriginal objects or skeletal remain in accordance with this plan (Section 5.4).	That new sites are registered on AHIMS That impacts to any newly identified sites are reported on AHIMS A communications log must be kept to document that all relevant parties are contacted throughout the processes listed in (Section 5.4.2 , e.g., RAPs, Heritage NSW, DPE, Coroner/Police, Project Archaeologist).
Long Term Management of Aboriginal object (Section 5.5).	To be determined based on outcomes of further consultation outlined in Section 5.5 of the ACHMP.

6.3 Aboriginal Heritage Induction Requirements

6.3.1 Site Inductions

All employees, contractors and sub-contractors involved in ground-disturbing activities will undergo an Aboriginal cultural heritage induction conducted either by a representative of the RAP, the Principal Contractor, or their subcontractor (once appropriately trained to present the induction). 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 Aboriginal heritage through an Aboriginal heritage component of the general site induction. Records of these inductions will be kept by APP/its contractors.

The following points will be conveyed through site induction material:

- Aboriginal sites have been identified in the Project Area and the wider Newcastle context.
- Aboriginal sites are of high 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 development consent includes conditions allowing impacts to certain specified Aboriginal sites in accordance with this plan.
- Recorded Aboriginal sites in relation to the project have includes a potential archaeological deposit (PAD) that is only visible beneath the ground surface.
- Aboriginal sites can be hard to recognise, therefore reference must be made to the Aboriginal heritage maps in this ACHMP in order to clearly identify demarcated site boundaries (in instances prior to the salvage measures being undertaken as part of this plan).
- A site must be investigated and/or salvaged by the project archaeologist(s) and RAPs prior to ground disturbance activities.
- That there are new finds procedures which involve stopping work if suspected new Aboriginal sites or skeletal material is identified on-site.

6.3.2 Complaints and Disputes

A complaints register will apply to the works associated with this ACHMP. Complaints will be recorded and considered in improvements and subsequent updates of the ACHMP. A Complaints register will be developed and updated monthly as per SSD-61618229 Condition B8.

6.3.3 Incident Reporting

The University of Newcastle will immediately notify DPHI and any other relevant agencies after it becomes aware of an incident resulting in unauthorised Aboriginal heritage impacts. Incident will need to comply with CoA SSD-61618229 Appendix 1.

6.3.4 Non-compliance Notification and Reporting

The development consent defines a 'non-compliance' as:

"An occurrence, set of circumstances or development that is a breach of this approval".

In accordance with CoA C6–C8 APA will, within seven days of becoming aware of an Aboriginal heritage non-compliance, notify DPHI of the non-compliance. Non-Compliance protocols must follow SSD-61618229 Condition A14 to A16.

6.4 Review and Improvement and Data Management

6.4.1 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-compliances and deficiencies
- develop and implement a plan of corrective and preventative action to address non-compliances and deficiencies
- verify the effectiveness of the corrective and preventative actions
- document any changes in procedures resulting from process improvement.

6.4.2 ACHMP Review and Updates

The ACHMP is to be reviewed and updated if necessary, in the following circumstances:

Within 3 months, unless the DPHI agrees otherwise, of:

- the submission of an incident report
- the submission of an audit report
- the approval of any modification to the conditions of this approval; or
- a direction of DPHI
- where modification to the project occurs that may affect impacts to Aboriginal heritage, i.e., where approved changes to the project change or remove previously planned impacts on Aboriginal heritage where mitigation was proposed in the ACHMP but is no longer required; and/or
- where complaints and/or non-compliances have been identified that require changes to ensure suitable management of Aboriginal heritage in future stages of the Project

- Aboriginal consultation for any updates and/or changes should be undertaken in accordance with **Section 3.3.2**
- where additional impacts are proposed to Aboriginal heritage and the plan is revised to include additional impacts, the plan must be provided to Heritage NSW and RAPs for review and comment for a minimum of 14 days.

7.0 References

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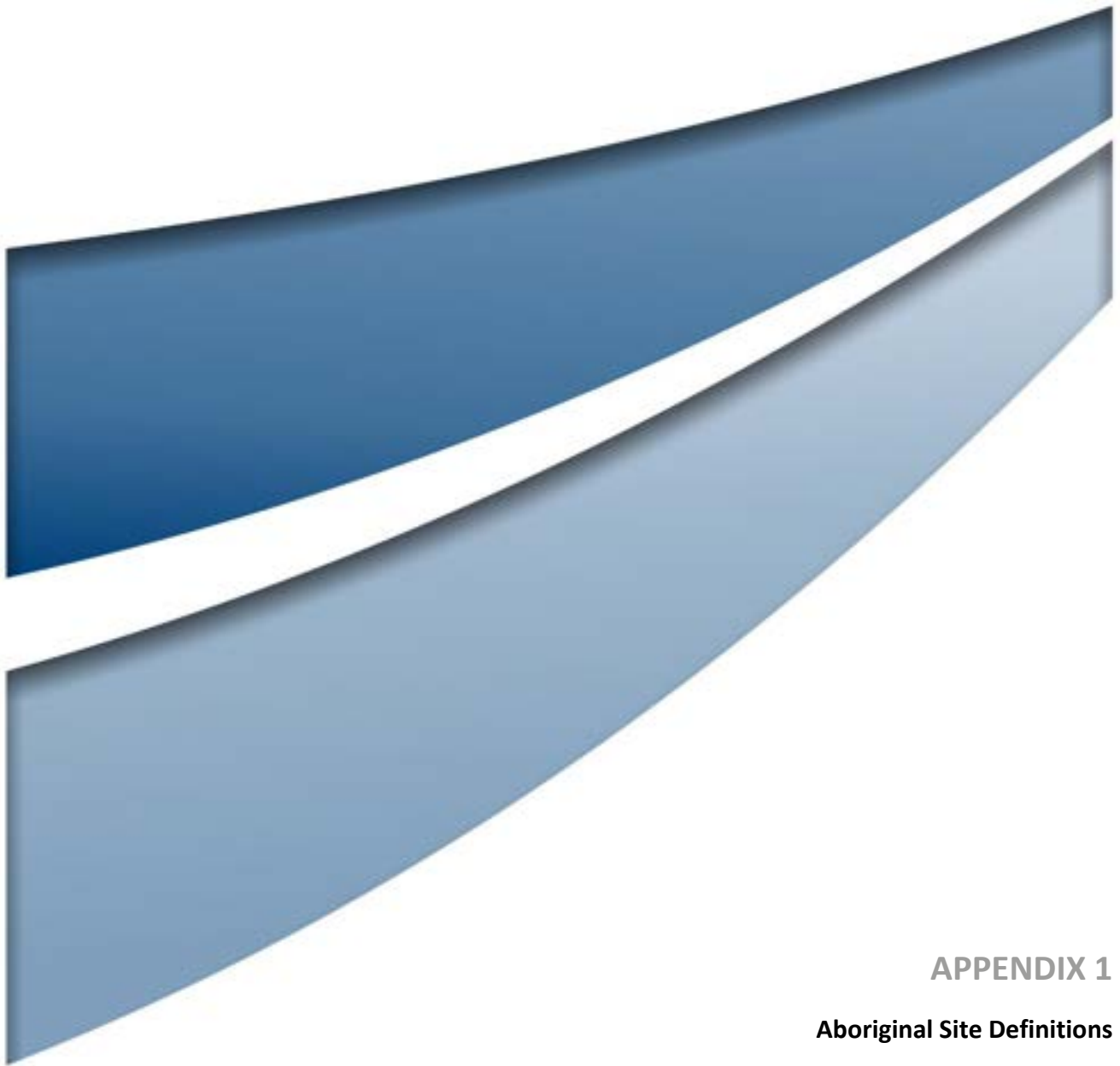
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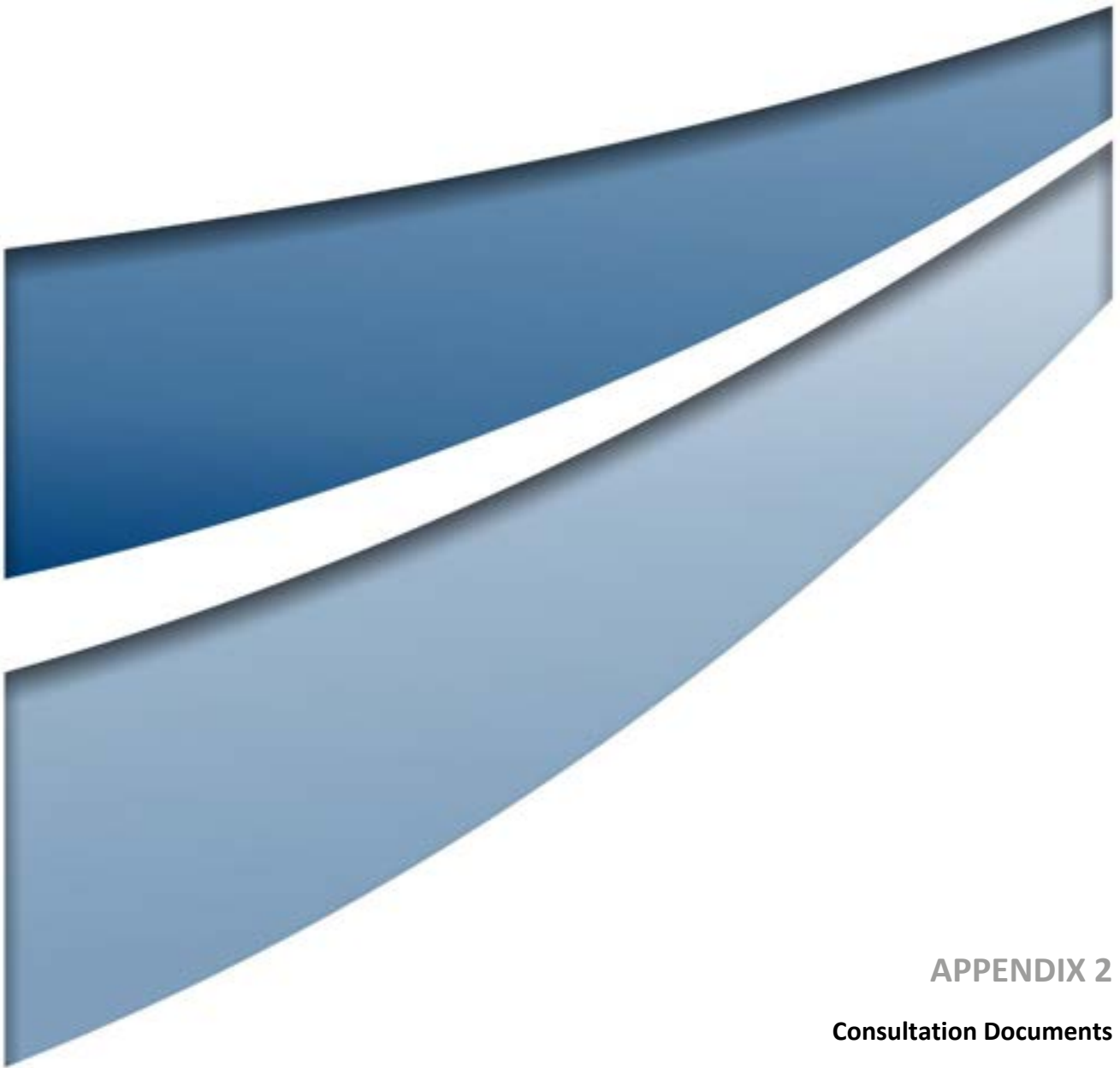
APPENDIX 1

Aboriginal Site Definitions

A description of terms used to describe different site features that should be used as a guide when identifying and interpreting Aboriginal site types.

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.
Contact site	Contact archaeology - e.g., European materials such as glass or ceramic utilised to make traditional Aboriginal tools, and/or broken brick/earthenware used as hearth retainers.
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/Midden	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.

Site Feature	Definition and Recording Methods
Stone quarry	Usually, a source of good quality stone which is quarried and used for the production of stone tools. Stone quarries represent where Aboriginal people gathered raw stone materials for stone tools and/or manufactured stone tools from the adjacent source material. Quarry sites are found at rock outcrops where the material was of suitable quality to have been used to manufacture stone tools. Stone quarries were defined by the presence of outcropping stone material with nearby evidence of the same material type used in the stone tool manufacture process. This was most commonly indicated by large stone cores or stone flakes distributed amongst the same naturally outcropping material.



APPENDIX 2

Consultation Documents

ABORIGINAL CONSULTATION RECORD				
Project Name: UNIVERSITY OF NEWCASTLE CITY CAMPUS STUDENT ACCOMMODATION: SSD-61618229 - ACHMP				Project #: 23355
ORGANISATION	CONTACTED BY	METHOD	DATE	COMMENTS
Review of draft Aboriginal Cultural Heritage Management Plan				
Didge Ngunawal Clan	Alison Fenwick	Email	17/04/2025	Response received 17/04/2025, supporting the draft ACHMP.
Gidawaa Walang & Barkuma Neighbourhood Centre Inc.	Alison Fenwick	Email	17/04/2025	No response received.
Gomery Cultural Consultants	Alison Fenwick	Email	17/04/2025	No response received.
Jarban & Mugrebea	Alison Fenwick	Email	17/04/2025	Response received 30/04/2025, supporting the draft ACHMP.
Kawul Pty Ltd trading as Wonn1 Sites	Alison Fenwick	Email	17/04/2025	No response received.
Kevin Duncan	Alison Fenwick	Email	17/04/2025	Response received 08/05/2025, requested that the reference to Worimi be removed, in the context of being Traditional Owners of the Newcastle area. Umwelt responded to this email and explained that the inclusion of the Worimi people is consistent with UoN projects.
Lower Hunter Aboriginal Incorporated	Alison Fenwick	Email	17/04/2025	No response received.
Murra Bidgee Mullangari Aboriginal Corporation	Alison Fenwick	Email	17/04/2025	No response received.
Nukara Indigenous Cultural & Heritage	Alison Fenwick	Email	17/04/2025	No response received.
Steve Talbott	Alison Fenwick	Email	17/04/2025	No response received.
Thomas Dahlstrom Offers ACH value by using 3D Laser and Drone technology	Alison Fenwick	Email	17/04/2025	No response received.
WATTAKA Pty Ltd	Alison Fenwick	Email	17/04/2025	No response received.
Widescope Indigenous Group	Alison Fenwick	Email	17/04/2025	No response received.
Worimi Traditional Owners Indigenous Corporation	Alison Fenwick	Email	17/04/2025	No response received.
Yinarr Cultural Services	Alison Fenwick	Email	17/04/2025	No response received.
Long Gully Cultural Services	Alison Fenwick	Email	17/04/2025	Response received 22/04/2025, supporting the draft ACHMP.
AT Gomilaroi Cultural Consultancy	Alison Fenwick	Email	17/04/2025	No response received.
Awabakal & Guringai Pty Ltd	Alison Fenwick	Email	17/04/2025	No response received.
Awabakal Descendants Traditional Owners Aboriginal Corporation (ADTOAC)	Alison Fenwick	Email	17/04/2025	Response received 14/05/2025, supporting the draft ACHMP and provided feedback concerning Section 5.5 of the ACHMP report and the long-term storage of any recovered artefacts.
Awabakal Local Aboriginal Land Council	Alison Fenwick	Email	17/04/2025	Response received 07/05/2025, no comments provided.
Awabakal Traditional Owners Aboriginal Corporation (ATOAC)	Alison Fenwick	Email	17/04/2025	Response received 15/05/2025, raised concerns regarding the wording of the Acknowledgement of Country. These comments were raised with the client and UoN, and necessary changes were made to the Acknowledgement of Country.
A1 Indigenous Services	Alison Fenwick	Email	17/04/2025	No response received.
Review of Revised Aboriginal Cultural Heritage Management Plan				
Didge Ngunawal Clan	Alison Fenwick	Email	14/08/2025	No response received.
Gidawaa Walang & Barkuma Neighbourhood Centre Inc.	Alison Fenwick	Email	14/08/2025	No response received.
Gomery Cultural Consultants	Alison Fenwick	Email	14/08/2025	No response received.
Jarban & Mugrebea	Alison Fenwick	Email	14/08/2025	No response received.
Kawul Pty Ltd trading as Wonn1 Sites	Alison Fenwick	Email	14/08/2025	No response received.
Kevin Duncan	Alison Fenwick	Email	14/08/2025	No response received.
Lower Hunter Aboriginal Incorporated	Alison Fenwick	Email	14/08/2025	No response received.
Murra Bidgee Mullangari Aboriginal Corporation	Alison Fenwick	Email	14/08/2025	Response received 14/08/2025, endorsing the revised ACHMP. No further comments.
Nukara Indigenous Cultural & Heritage	Alison Fenwick	Email	14/08/2025	No response received.
Steve Talbott	Alison Fenwick	Email	14/08/2025	No response received.
Thomas Dahlstrom Offers ACH value by using 3D Laser and Drone technology	Alison Fenwick	Email	14/08/2025	Response received 25/08/2025, confirming the revised ACHMP had been received. No further comments.
WATTAKA Pty Ltd	Alison Fenwick	Email	14/08/2025	No response received.
Widescope Indigenous Group	Alison Fenwick	Email	14/08/2025	No response received.
Worimi Traditional Owners Indigenous Corporation	Alison Fenwick	Email	14/08/2025	Response received 16/08/2025, endorsing the revised ACHMP. No further comments.
Yinarr Cultural Services	Alison Fenwick	Email	14/08/2025	No response received.
Long Gully Cultural Services	Alison Fenwick	Email	14/08/2025	No response received.
AT Gomilaroi Cultural Consultancy	Alison Fenwick	Email	14/08/2025	No response received.
Awabakal & Guringai Pty Ltd	Alison Fenwick	Email	14/08/2025	No response received.
Awabakal Descendants Traditional Owners Aboriginal Corporation (ADTOAC)	Alison Fenwick	Email	14/08/2025	No response received.
Awabakal Local Aboriginal Land Council	Alison Fenwick	Email	14/08/2025	No response received.
Awabakal Traditional Owners Aboriginal Corporation (ATOAC)	Alison Fenwick	Email	14/08/2025	No response received.
A1 Indigenous Services	Alison Fenwick	Email	14/08/2025	Response received 16/08/2025, endorsing the revised ACHMP. No further comments.

23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

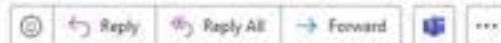


Alison Fenwick

To

Cc Ryan Desic; Trigg Bailey; Mathew Watson

Bcc peterleven@ymail.com; ngumugu74@outlook.com; lily carroll; Ethan Trevellyn; Leanne Kirkman; Leslie Atkinson; Darleen Johnson; C McDougall; Thomas Dahlstrom; WIDESCOPE; Worren TOC; Carolyn.H; reception@awabakallak.com.au; Brent Ellis; Kevin Duncier; Kerrie Brauer; Lower Hunter Aboriginal Incorporated; Tracey Howie



Thu 17/04/2025 4:41 PM

Dear Registered Party,

Thank you for your continued involvement in Aboriginal consultation for the proposed University of Newcastle City Campus Student Accommodation Project. The attached draft Aboriginal Cultural Heritage Management Plan (ACHMP) is required in accordance with development consent that was granted for the project in March 2025. This plan incorporates the relevant management measures presented in the project Aboriginal Cultural Heritage Assessment Report (ACHA) (Umwelt 2024) submitted as part of the EIS, and conditions of consent relating to Aboriginal cultural heritage.

In accordance with the draft ACHMP, Project Registered Aboriginal Parties are being offered **28 days** to review and provide any feedback about the draft ACHMP (attached). As such, please provide any comments **by 15 May 2025**. In particular, there are sections in the ACHMP highlighted in grey which require RAP feedback to determine the final management option, this specifically refers to the long-term management of any salvaged Aboriginal objects (either a Care Agreement or Reburial of cultural materials).

Thank you for your time, and we look forward to any feedback you wish to provide.

Alison Fenwick

Archaeologist

p. 1300 793 267

m. 0487 654 665

in. www.umwelt.com.au

Alison Fenwick

From: Alison Fenwick
Sent: Thursday, 17 April 2025 4:41 PM
Cc: Ryan Desic; Trigg, Bailey; Mathew Watson
Subject: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan
Attachments: 23355_R01_ACHMP_V1.pdf

Dear Registered Party,

Thank you for your continued involvement in Aboriginal consultation for the proposed University of Newcastle City Campus Student Accommodation Project. The attached draft Aboriginal Cultural Heritage Management Plan (ACHMP) is required in accordance with development consent that was granted for the project in March 2025. This plan incorporates the relevant management measures presented in the project Aboriginal Cultural Heritage Assessment Report (ACHA) (Umwelt 2024) submitted as part of the EIS, and conditions of consent relating to Aboriginal cultural heritage.

In accordance with the draft ACHMP, Project Registered Aboriginal Parties are being offered **28 days** to review and provide any feedback about the draft ACHMP (attached). As such, please provide any comments **by 15 May 2025**. In particular, there are sections in the ACHMP highlighted in grey which require RAP feedback to determine the final management option, this specifically refers to the long-term management of any salvaged Aboriginal objects (either a Care Agreement or Reburial of cultural materials).

Thank you for your time, and we look forward to any feedback you wish to provide.

Alison Fenwick

Archaeologist

p. **1300 793 267**

m. **0407 654 665**

w. **www.umwelt.com.au**

Alison Fenwick

From: Alison Fenwick
Sent: Wednesday, 7 May 2025 12:29 PM
Cc: Ryan Desic; Trigg, Bailey; Watson, Mathew; Tim Adams
Subject: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

Dear Representatives,

This is a courtesy reminder that any comments, concerns or general feedback concerning the draft Aboriginal Cultural Heritage Management Plan (ACHMP) for the University of Newcastle City Campus Student Accommodation Project is due **by 15 May 2025**. In particular, there are sections in the ACHMP highlighted in grey which require RAP feedback to determine the final management option, this specifically refers to the long-term management of any salvaged Aboriginal objects (either a Care Agreement or Reburial of cultural materials).

Please reference the email sent on 17th April 2025, which contains a copy of the draft report for your review. If you have any issues accessing this attachment, please reach out.

Thank you for your time, and we look forward to any feedback you wish to provide.

Alison Fenwick

Archaeologist

p. **1300 793 267**
m. **0407 654 665**
w. **www.umwelt.com.au**

Alison Fenwick

From: peterleven@y7mail.com
Sent: Wednesday, 14 May 2025 12:17 PM
To: Alison Fenwick
Cc: 'Tori Leven'
Subject: RE: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan
Attachments: ADTOAC response ACHMP UoN Student Accommodation Project.pdf

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ALLA, Alison

Please find attached ADTOAC's Response to the University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan.

If you require any additional information, please feel free to contact us at your convenience.

NGI NOA,

Tori Davis
Director
Awabakal Descendants Traditional Owners Aboriginal Corporation
Email: Tori.Leven1@gmail.com Mobile: 0423057820
PO Box 137 Budgewoi NSW 2262

Peter Leven
Managing Director
Awabakal Descendants Traditional Owners Aboriginal Corporation
Email: peterleven@y7mail.com Phone: 0243903740 Mobile: 0405149684
PO Box 137 Budgewoi NSW 2262



Confidentiality Notice: All of the content and any information within or attached to this email is private and confidential and only between Awabakal Descendants Traditional Owners Aboriginal Corporation (ADTOAC), and the addressee/s. Under no circumstance is this information to be copied, emailed, transmitted in any form, faxed, transferred to other departments or allowed to be used within or for reports or any other documents or applications or purposes. The information contained within this email and any attached documents is not to be supplied to or used by any other person/s other than the intended addressee/s subject to our explicit permission.

From: Alison Fenwick <afenwick@umwelt.com.au>
Sent: Thursday, 17 April 2025 4:41 PM
Cc: Ryan Desic <rdesic@umwelt.com.au>; Trigg, Bailey <Bailey.Trigg@app.com.au>; Mathew Watson <mathew.watson@app.com.au>
Subject: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

Dear Registered Party,

Thank you for your continued involvement in Aboriginal consultation for the proposed University of Newcastle City Campus Student Accommodation Project. The attached draft Aboriginal Cultural Heritage Management

Plan (ACHMP) is required in accordance with development consent that was granted for the project in March 2025. This plan incorporates the relevant management measures presented in the project Aboriginal Cultural Heritage Assessment Report (ACHA) (Umwelt 2024) submitted as part of the EIS, and conditions of consent relating to Aboriginal cultural heritage.

In accordance with the draft ACHMP, Project Registered Aboriginal Parties are being offered **28 days** to review and provide any feedback about the draft ACHMP (attached). As such, please provide any comments **by 15 May 2025**. In particular, there are sections in the ACHMP highlighted in grey which require RAP feedback to determine the final management option, this specifically refers to the long-term management of any salvaged Aboriginal objects (either a Care Agreement or Reburial of cultural materials).

Thank you for your time, and we look forward to any feedback you wish to provide.

Alison Fenwick

Archaeologist

p. **1300 793 267**

m. **0407 654 665**

w. **www.umwelt.com.au**

Alison Fenwick

From: Alison Fenwick
Sent: Thursday, 15 May 2025 3:17 PM
To: Kerrie Brauer
Cc: Ryan Desic; 'Trigg, Bailey'; 'Mathew Watson'
Subject: RE: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

Hi Kerrie,

Great to hear from you and thank you for sending through your concerns.

The Acknowledgement of Country, as found in the draft report, is in reference to the wider University of Newcastle network and is not exclusive to the Newcastle area, or the Project Area. I have addressed these concerns with an appropriate representative and will to my best to make sure there is more clarity in the revised draft.

Kind regards,
Alison

Alison Fenwick

Archaeologist

p. 1300 793 267
m. 0407 654 665
w. www.umwelt.com.au

From: Kerrie Brauer <kerrie@awabakal.com.au>
Sent: Tuesday, 13 May 2025 1:43 PM
To: Alison Fenwick <afenwick@umwelt.com.au>
Cc: Ryan Desic <rdesic@umwelt.com.au>; 'Trigg, Bailey' <Bailey.Trigg@app.com.au>; 'Mathew Watson' <mathew.watson@app.com.au>
Subject: RE: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

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Hi Alison,

Thank you for your email.

We have read through the Draft Aboriginal Cultural Heritage Management Plan for the University of Newcastle City Campus Student Accommodation Project and would like to mention a few concerns.

With regards to the Acknowledgement of Country Our Elders are certain that the University of Newcastle sits within the Awabakal Region and are wondering why the document is saying that; ... *"The University of Newcastle*

acknowledges the traditional custodians of the lands within our footprint areas: the Awabakal, Darkinjung, Biripai, Worimi, Wonnarua and Eora Nations”, as this Project is within the Newcastle area ONLY.

Our Elders are most upset with this obvious disregard to the original inhabitation of the wider Newcastle Region by including others from different areas that have no connection to the Newcastle Cultural Region, and we will not make anymore comments regarding the Draft Aboriginal Cultural Heritage Management Plan until the Acknowledgement of Country is rectified.

Regards,
Kerrie Brauer



Kerrie Brauer | Director | Administration | Awabakal Traditional Owners Aboriginal Corporation
M: 04 12 86 63 57 | E: kerrie@awabakal.com.au | www.awabakal.com.au
PO Box 122 Rutherford NSW 2320 Australia

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From: Alison Fenwick [<mailto:afenwick@umwelt.com.au>]
Sent: Thursday, 17 April 2025 4:41 PM
Cc: Ryan Desic; Trigg, Bailey; Mathew Watson
Subject: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

Dear Registered Party,

Thank you for your continued involvement in Aboriginal consultation for the proposed University of Newcastle City Campus Student Accommodation Project. The attached draft Aboriginal Cultural Heritage Management Plan (ACHMP) is required in accordance with development consent that was granted for the project in March 2025. This plan incorporates the relevant management measures presented in the project Aboriginal Cultural Heritage Assessment Report (ACHA) (Umwelt 2024) submitted as part of the EIS, and conditions of consent relating to Aboriginal cultural heritage.

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Thank you for your time, and we look forward to any feedback you wish to provide.

Alison Fenwick
Archaeologist

p. 1300 793 267
m. 0407 654 665
w. www.umwelt.com.au

Alison Fenwick

From: lilly carroll <didgengunawalclan@yahoo.com.au>
Sent: Thursday, 17 April 2025 4:47 PM
To: Alison Fenwick
Subject: Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

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Hi Alison

No dramas from our end, we have worked previously with iMac, Group and sides with their draft

Cheers Paul

[Sent from Yahoo Mail for iPhone](#)

On Thursday, April 17, 2025, 4:41 pm, Alison Fenwick <afenwick@umwelt.com.au> wrote:

Dear Registered Party,

Thank you for your continued involvement in Aboriginal consultation for the proposed University of Newcastle City Campus Student Accommodation Project. The attached draft Aboriginal Cultural Heritage Management Plan (ACHMP) is required in accordance with development consent that was granted for the project in March 2025. This plan incorporates the relevant management measures presented in the project Aboriginal Cultural Heritage Assessment Report (ACHA) (Umwelt 2024) submitted as part of the EIS, and conditions of consent relating to Aboriginal cultural heritage.

In accordance with the draft ACHMP, Project Registered Aboriginal Parties are being offered **28 days** to review and provide any feedback about the draft ACHMP (attached). As such, please provide any comments **by 15 May 2025**. In particular, there are sections in the ACHMP highlighted in grey which require RAP feedback to determine the final management option, this specifically refers to the long-term management of any salvaged Aboriginal objects (either a Care Agreement or Reburial of cultural materials).

Thank you for your time, and we look forward to any feedback you wish to provide.

Alison Fenwick
Archaeologist

p. **1300 793 267**

m. **0407 654 665**

w. **www.umwelt.com.au**

Alison Fenwick

From: Leslie Atkinson <les.atkinson@hotmail.com>
Sent: Wednesday, 30 April 2025 3:08 PM
To: Alison Fenwick
Subject: Re: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

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yuamma Alison

I agree to the draft ACHMP ,, Les

From: Alison Fenwick <afenwick@umwelt.com.au>
Sent: Thursday, April 17, 2025 4:40 PM
Cc: Ryan Desic <rdesic@umwelt.com.au>; Trigg, Bailey <Bailey.Trigg@app.com.au>; Mathew Watson <mathew.watson@app.com.au>
Subject: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

Dear Registered Party,

Thank you for your continued involvement in Aboriginal consultation for the proposed University of Newcastle City Campus Student Accommodation Project. The attached draft Aboriginal Cultural Heritage Management Plan (ACHMP) is required in accordance with development consent that was granted for the project in March 2025. This plan incorporates the relevant management measures presented in the project Aboriginal Cultural Heritage Assessment Report (ACHA) (Umwelt 2024) submitted as part of the EIS, and conditions of consent relating to Aboriginal cultural heritage.

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Thank you for your time, and we look forward to any feedback you wish to provide.

Alison Fenwick

Archaeologist

p. 1300 793 267
m. 0407 654 665
w. www.umwelt.com.au

Alison Fenwick

From: kevin.duncan@bigpond.com
Sent: Thursday, 8 May 2025 1:00 PM
To: Alison Fenwick
Subject: Re: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

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Anigunya, Alison , As a Traditional Awaba person I protest strongly about the draft identifying Worimi as traditional owners to which they are certainly not they do not cross the river, my family is Biraban who was my Blood Uncle and his younger brother Kuttirun William Bird my Grandfather born and bred on the Mission which Lancelot Threlkeld established on Lake Awaba in 1826 at present day Belmont then later at Toronto. My Grandfather Kuttirun and Uncle Biraban left an amazing cultural legacy of our land and of our people , for one explaining to the Colonial Secretary of British Government in 1830s of the Awaba peoples boundaries when Threlkeld had taken Uncle Biraban with him at Parramatta to give evidence of the local peoples and their boundaries where the Mission was established. The Worimi were never mentioned as owners of Awaba lands the Worimi should be removed as owners of our traditional Awaba lands in the document as this is a straight out Lie and goes against everything of Awaba Traditional Lore and customs beliefs , How can another tribe claim ownership of another Mobs lands when we as the Awaba people are well known and written about as one of the very first Aboriginal people to have interaction with the colonists. I again strongly propose that Worimi be removed as traditional owners please the truth must not only reflect the truth but must be told.

With Respect ,
Kevin Duncan Awaba Peoples.

On ,Thu Apr 17 2025 16:40:59 GMT+1000 (Australian Eastern Standard Time), Alison Fenwick <afenwick@umwelt.com.au> wrote:

----- Original Message -----

Dear Registered Party,

Thank you for your continued involvement in Aboriginal consultation for the proposed University of Newcastle City Campus Student Accommodation Project. The attached draft Aboriginal Cultural Heritage Management Plan (ACHMP) is required in accordance with development consent that was granted for the project in March 2025. This plan incorporates the relevant management measures presented in the project Aboriginal Cultural Heritage Assessment Report (ACHA) (Umwelt 2024) submitted as part of the EIS, and conditions of consent relating to Aboriginal cultural heritage.

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Alison Fenwick

Archaeologist

p. 1300 793 267

m. 0407 654 665

w. www.umwelt.com.au

Alison Fenwick

From: Ethan Trewlynn <ethan3trewlynn@gmail.com>
Sent: Tuesday, 22 April 2025 11:50 AM
To: Alison Fenwick
Cc: Ryan Desic; Trigg, Bailey; Mathew Watson
Subject: Re: 23355 - University of Newcastle City Campus Student Accommodation Project - DRAFT Aboriginal Cultural Heritage Management Plan

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Hi Alison,

I have the ACHMP and I'm happy with everything that I have read and for it to go ahead!

Kind regards,

Ethan

On Thu, 17 Apr 2025, 4:41 pm Alison Fenwick, <afenwick@umwelt.com.au> wrote:

Dear Registered Party,

Thank you for your continued involvement in Aboriginal consultation for the proposed University of Newcastle City Campus Student Accommodation Project. The attached draft Aboriginal Cultural Heritage Management Plan (ACHMP) is required in accordance with development consent that was granted for the project in March 2025. This plan incorporates the relevant management measures presented in the project Aboriginal Cultural Heritage Assessment Report (ACHA) (Umwelt 2024) submitted as part of the EIS, and conditions of consent relating to Aboriginal cultural heritage.

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Thank you for your time, and we look forward to any feedback you wish to provide.

Alison Fenwick
Archaeologist

p. 1300 793 267

m. 0407 654 665

w. www.umwelt.com.au



PO BOX 137
BUDGEWOI
NSW 2262

Date: 14th May 2025

Attention: Alison Fenwick
Umwelt (Australia) Pty Limited
75 York Street
Teralba, NSW 2284

RE: Draft Aboriginal Cultural Heritage Management Plan (ACHMP) University of Newcastle City Campus Student Accommodation Project

ALLA Alison,

We are writing to notify you that the Awabakal Descendants Traditional Owners Aboriginal Corporation (ADTOAC) have reviewed the Draft Aboriginal Cultural Heritage Management Plan (ACHMP) for the University of Newcastle City Campus Student Accommodation Project

ADTOAC believe the report provided for review is comprehensive and agree in principal with the Draft.

Below I have put forward on behalf of ADTOAC our comments and recommendations for your consideration.

ADTOAC recommendation

5.5 Long Term Management of Aboriginal object

Recommendation

Any recovered Cultural material is to be reburied in a Culturally appropriate manner onsite following any scientific analysis.

ADTOAC appreciate the opportunity to review the Draft Aboriginal Cultural Heritage Management Plan (ACHMP) for the University of Newcastle City Campus Student Accommodation Project

If you require any further information or clarification regarding our comments or suggested recommendations please contact us at your convenience.

NGI NOA

Tori Davis – Director - Awabakal Descendants Traditional Owners Aboriginal Corporation
Email: Tori.Leven1@gmail.com Mobile: 0423057820
PO Box 137 Budgewoi NSW 2262

Peter Leven-Managing Director: Awabakal Descendants Traditional Owners Aboriginal Corporation
Email: peterleven@y7mail.com Phone: 0243903740 Mobile: 0405149684

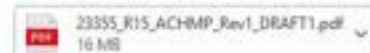
Cultural Heritage Sites - Physical reminders of our Ancestors; once they are gone, they are gone forever and impossible to bring back!! THINK first and make WISE decisions last!!



Alison Fenwick

To
Cc [Ryan Desic](#); [Mathew Watson](#); [Bailey Trigg](#)
Bcc: [peterleven@y7mail.com](#); [ngurugu74@outlook.com](#); [Leanne Kirkman](#); [Darleen Johnson](#); [C McDougall](#); [Thomas Dahlstrom](#); [WIDESCOPE](#); [Worimi TOC](#); [Carolyn JH](#); [Brent Ellis](#); [Kevin Duncan](#); [Kerrie Brauer](#); [Lower Hunter Aboriginal Incorporated](#); [Tracey Howie](#); [Michael Smith](#)

This is the most recent version, but you made changes to another copy. [Click here to see the other versions.](#)



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Thu 14/06/2023 10:10 AM

We are writing to inform you that the Aboriginal Cultural Heritage Management Plan (ACHMP) for the University of Newcastle Student Accommodation Project at Honeysuckle has undergone an update.

Background

Further geotechnical investigations identified a need for additional ground improvement works to structurally support the proposed development. The proposed method involves the use of rigid inclusions to enhance ground stability. These will be installed using a displacement auger, meaning the augered material will be retained underground rather than brought to the surface.

- Estimated depth: 7m below ground surface.
- Auger diameter: 350 mm
- Quantity: 144 auger locations within mapped Hunter River Shoreline (including buffer)
- Total potential impact footprint: 13.8 m2

Archaeological works under the project's ACHMP are currently underway. As these additional works are not covered under the current ACHMP, an update is required. The proposal is to offset the impact of the ground improvement works by expanding the scope for open-area excavation, without the strict requirement to excavate only where project ground-disturbing activities are proposed.

The updated report has been attached for your review, and to provide any feedback. All updated sections are provided as tracked changes, with corresponding comments where applicable, to help with the review process. Please provide any comments by **28th August 2025 (14 days)**.

If you have any further questions or concerns, please don't hesitate to get in contact.

Kind regards,
Alison

Alison Fenwick
Archaeologist

p. 1300 793 267
m. 0407 654 665
w. www.utmwell.com.au

Alison Fenwick

From: Alison Fenwick
Sent: Monday, 25 August 2025 1:18 PM
Cc: Ryan Desic; Mathew Watson; Bailey Trigg
Subject: Reminder: 23355 - University of Newcastle City Campus Student Accommodation Project - Updated Aboriginal Cultural Heritage Management Plan

Dear Representatives,

This is a courtesy reminder that any comments, concerns or general feedback concerning the updated Aboriginal Cultural Heritage Management Plan (ACHMP) for the University of Newcastle City Campus Student Accommodation Project is due by **28th August 2025 (3 days)**.

Please reference the email sent on Thursday 14th August 2025, which contains a copy of the updated report for your review. If you have any issues accessing this attachment, please reach out.

Thank you for your time, and we look forward to any feedback you wish to provide.

Kind regards,
Alison

Alison Fenwick

Archaeologist

p. 1300 793 267
m. 0407 654 665
w. www.umwelt.com.au

From: Alison Fenwick
Sent: Thursday, 14 August 2025 10:10 AM
Cc: Ryan Desic <rdesic@umwelt.com.au>; Mathew Watson <mathew.watson@app.com.au>; Bailey Trigg <bailey.trigg@app.com.au>
Subject: 23355 - University of Newcastle City Campus Student Accommodation Project - Updated Aboriginal Cultural Heritage Management Plan

Dear Representatives,

We are writing to inform you that the Aboriginal Cultural Heritage Management Plan (ACHMP) for the University of Newcastle Student Accommodation Project at Honeysuckle has undergone an update.

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If you have any further questions or concerns, please don't hesitate to get in contact.

Kind regards,
Alison

Alison Fenwick

Archaeologist

p. **1300 793 267**

m. **0407 654 665**

w. **www.umwelt.com.au**

Alison Fenwick

From: Alison Fenwick
Sent: Thursday, 14 August 2025 10:10 AM
Cc: Ryan Desic; Mathew Watson; Bailey Trigg
Subject: 23355 - University of Newcastle City Campus Student Accommodation Project - Updated Aboriginal Cultural Heritage Management Plan
Attachments: 23355_R15_ACHMP_Rev1_DRAFT1.pdf

Dear Representatives,

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Alison

Alison Fenwick

Archaeologist

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w. www.umwelt.com.au

Alison Fenwick

From: Carolyn .H <cazadirect@live.com>
Sent: Monday, 18 August 2025 4:53 PM
To: Alison Fenwick
Subject: Re: 23355 - University of Newcastle City Campus Student Accommodation Project - Updated Aboriginal Cultural Heritage Management Plan
Attachments: A1.PL.2026.pdf; A1.WC.2026.pdf

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*



Contact: Carolyn Hickey
Mobile: 0411650057
Email: Cazadirect@live.com
Address: 73 Russell St, Emu Plains, NSW 2750
ABN: 20 616 970 327

Good afternoon,

I have reviewed the document and fully support the Information and Methodology.

I would like to be included in all meetings, reports, sharing of cultural information, and fieldwork.

I have attached A1 Indigenous Services Insurances.

A1 INDIGENOUS SERVICES, Represents over 100 Indigenous Locals

I agree to my details being shared with OEH and the LALC. Please feel free to contact me using the details provided above.

Kind regards,
Carolyn & Julie Hickey

A1 Indigenous Services is a 100% Indigenous-owned Australian company offering a range of services to the construction industry. Our mission is to commit to an innovative approach for a better future for Indigenous employment and community, while improving ways to close the gap in Aboriginal participation in the construction industry.

We are dedicated to building strength in Aboriginal communities and our Indigenous labour force.



A1 Indigenous Services is a member of the NSW Indigenous Chamber of Commerce (NSWICC). A business or enterprise carrying the NSWICC Assured logo has met national policy requirements as upheld by FACCI, ensuring that it is identified as a First Nations business owner or entrepreneur and that it demonstrates compliance with government and industry regulators.



From: Alison Fenwick <afenwick@umwelt.com.au>

Sent: Thursday, 14 August 2025 10:09 AM

Cc: Ryan Desic <rdesic@umwelt.com.au>; Mathew Watson <mathew.watson@app.com.au>; Bailey Trigg <bailey.trigg@app.com.au>

Subject: 23355 - University of Newcastle City Campus Student Accommodation Project - Updated Aboriginal Cultural Heritage Management Plan

Dear Representatives,

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Kind regards,
Alison

Alison Fenwick

Archaeologist

p. **1300 793 267**

m. **0407 654 665**

w. **www.umwelt.com.au**

Alison Fenwick

From: Darleen Johnson <murrabidgeemullangari@yahoo.com.au>
Sent: Thursday, 14 August 2025 1:55 PM
To: Alison Fenwick
Subject: Re: 23355 - University of Newcastle City Campus Student Accommodation Project - Updated Aboriginal Cultural Heritage Management Plan

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Hi Alison
I have read the project information and ACHMP updated plan and endorse the recommendations.
Kind regards
Darleen
0490051102

On Thursday 14 August 2025 at 10:10:09 am AEST, Alison Fenwick <afenwick@umwelt.com.au> wrote:

Dear Representatives,

We are writing to inform you that the Aboriginal Cultural Heritage Management Plan (ACHMP) for the University of Newcastle Student Accommodation Project at Honeysuckle has undergone an update.

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Alison

Alison Fenwick

Archaeologist

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m. **0407 654 665**

w. **www.umwelt.com.au**

Alison Fenwick

From: Thomas Dahlstrom <gamila_roi@yahoo.com.au>
Sent: Monday, 25 August 2025 1:09 PM
To: Alison Fenwick
Subject: Re: 23355 - University of Newcastle City Campus Student Accommodation Project - Updated Aboriginal Cultural Heritage Management Plan

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*

Thanks Alison

Sent from my iPhone

On 14 Aug 2025, at 10:10 am, Alison Fenwick <afenwick@umwelt.com.au> wrote:

Dear Representatives,

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<23355_R15_ACHMP_Rev1_DRAFT1.pdf>

Alison Fenwick

From: Worimi Yorta Yorta <worimitoc@hotmail.com>
Sent: Saturday, 16 August 2025 12:06 PM
To: Alison Fenwick
Cc: Ryan Desic; Mathew Watson; Bailey Trigg
Subject: Re: 23355 - University of Newcastle City Campus Student Accommodation Project - Updated Aboriginal Cultural Heritage Management Plan

*This message originated from outside of Umwelt - **BE CAUTIOUS** opening any link or attachment.*
Guudji Alison,

I have shown the Worimi Elders the amendment to the project area and they agree and support the amendment.

Thanking you culturally,

Candy on behalf of

Worimi Sovereignty Committee

naarka ghurrungkee
mobile: 0412 475 362
mobile: 0413 832 385
email: worimitoc@hotmail.com
email: worimisovereignty@hotmail.com



Guudji Yiigu, We are the Worimi sovereigns, we acknowledge and pay our respects to the people of the Worimi who are the traditional owners of the land on which we live, to their continuing connection to land, water, culture and tribe and pay our respects to our Elders past, present and to our future generations.

From: Alison Fenwick <afenwick@umwelt.com.au>
Sent: Thursday, 14 August 2025 10:09 AM
Cc: Ryan Desic <rdesic@umwelt.com.au>; Mathew Watson <mathew.watson@app.com.au>; Bailey Trigg <bailey.trigg@app.com.au>
Subject: 23355 - University of Newcastle City Campus Student Accommodation Project - Updated Aboriginal Cultural Heritage Management Plan

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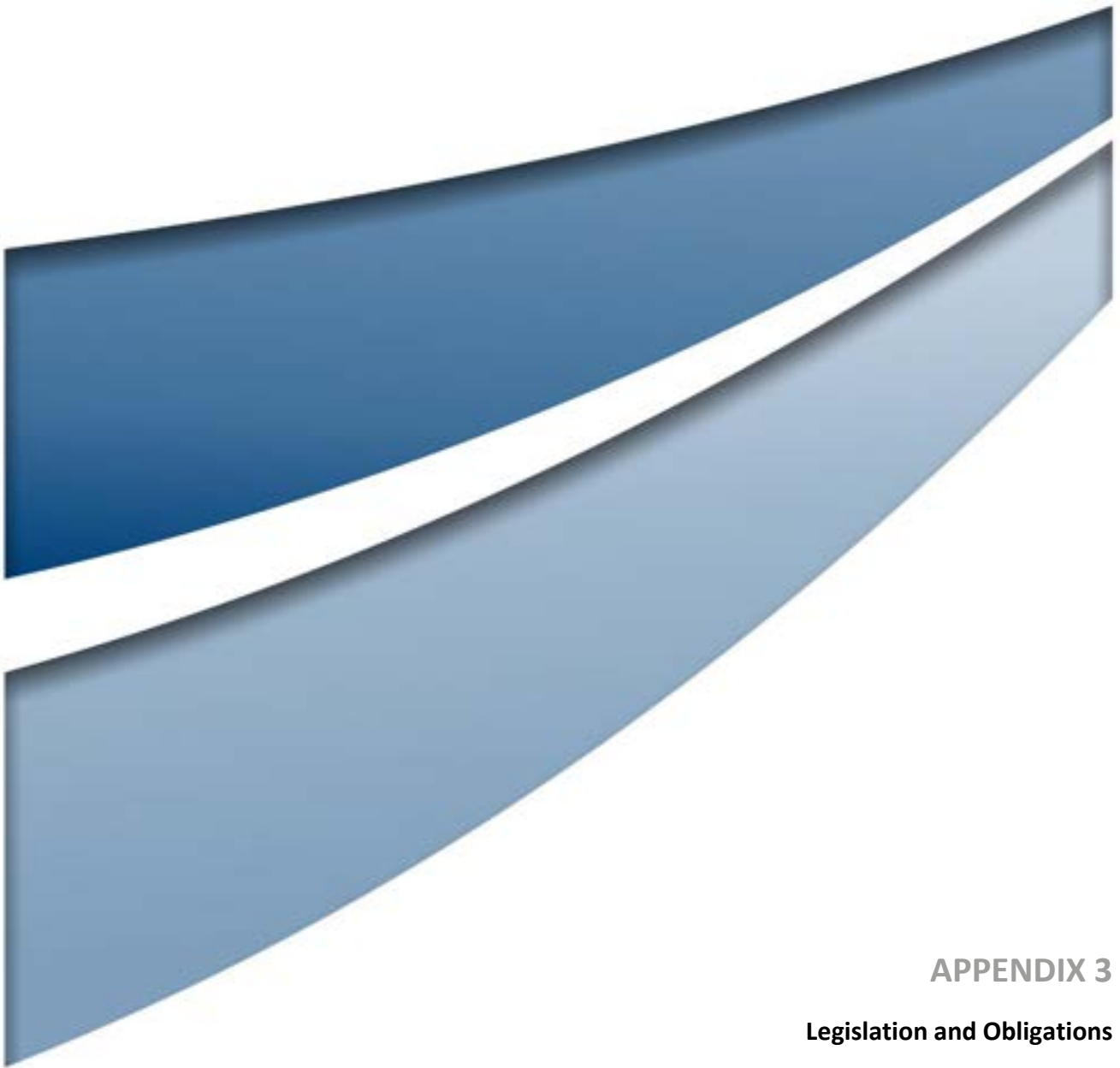
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Alison

Alison Fenwick
Archaeologist

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APPENDIX 3

Legislation and Obligations

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.

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 NPW Act defines “harm” to an object or place as any act or omission that:

- destroys, defaces or damages the object or place, or
- in relation to an object-moves the object from the land on which it had been situated, or
- is specified by the regulations, or
- 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:
- desecrates the object or place, or
- is trivial or negligible, or
- is excluded from this definition by the regulations.

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 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.

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 Site Manager.

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/DECCAHIIMSSiteRecordingForm.htm>.

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 determined 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 (this would require an update to the ACHMP). Care Agreement application forms can be downloaded at:

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

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 a SSD/SSI approval under the EP&A Act.

Completed forms must be submitted to the AHIMS Registrar at ahims@environment.nsw.gov.au.

Aboriginal Site Impact Recording Forms can be downloaded at:

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