

8 April 2022

The General Manager
Wagga Wagga City Council

To whom it may concern,

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

1. INTRODUCTION

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

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

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

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

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

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

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

1.1. SUBJECT AREA LOCATION AND CONTEXT

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

The subject area encompasses approximately 225.02 hectares (2,250, 227m²) and has frontages to Holbrook Road to the west and Rowan Road to the south. To the north, there is R5 Large Lot Residential zoning and to east, south, and west it is RU1 Primary Production.

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

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

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

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

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

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

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

2. METHODOLOGY

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

2.1. ABORIGINAL CULTURAL HERITAGE ASSESSMENT

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

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

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

Table 1 – ACHA Methodology

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

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

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

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

List of Registered Aboriginal Parties:

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

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

2.2. CULTURAL VALUES ASSESSMENT

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

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

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

Table 2 –CVA process

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

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

3. CONCLUSIONS & RECOMMENDATIONS

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

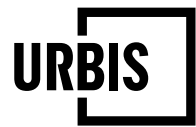
Urbis support the ILP on a cultural heritage basis, with the provision that this is subject to change pending the results of the ACHA and CVA process, with the preference being to avoid impacts in areas of higher sensitivity.

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

Yours sincerely,

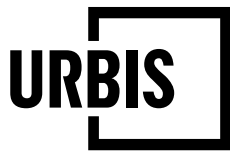


Meggan Walker
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APPENDIX A

CONSULTATION DOCUMENTS TO DATE



**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

URBIS.COM.AU
Urbis Pty Ltd
ABN 50 105 256 228

9 March 2022

To whom it may concern,

ROWAN VILLAGE - ABORIGINAL CULTURAL HERITAGE ASSESSMENT- ABORIGINAL COMMUNITY CONSULTATION STAGE 1.2

Urbis has been commissioned by DevCore Property Group ("The Proponent") to conduct an Aboriginal Cultural Heritage Assessment (ACHA) for Rowan Village (hereafter referred to as the subject area). The subject area is within the City of Wagga Wagga Local Government Area (LGA) and is on the traditional lands of the Wiradjuri People. The subject area is located at 7066 Holbrook Road, Rowan and comprises the following legally described parcels of land:

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

The ACHA is to inform a Planning Proposal to Wagga Wagga City Council for the masterplan redevelopment of the subject area, with work to be undertaken under a future local Development Application.

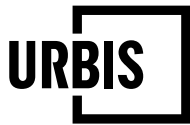
The ACHA is to be carried out in accordance with relevant guidelines under *the National Parks and Wildlife Act 1974* (NPW Act), including *the Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW* (OEH 2011). The assessment would detail any potential Aboriginal cultural heritage resources within the subject area and provide recommendations regarding management of those resources, and will inform an application for an Aboriginal Heritage Impact Permit (AHIP) should one be required. The ACHA is being prepared alongside a Cultural Values Assessment, which will identify and assist in the management of intangible cultural heritage at the site.

As part of the ACHA, Urbis will conduct a community consultation process with registered Aboriginal parties. The community consultation will be conducted in accordance with Section 4 of the Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010 (Department of Environment, Climate Change and Water).

The Proponent can be contacted via:

Cameron Beames
Development Manager
DevCore Property Group
E: cameron@devcore.com.au

In accordance with Section 4.1.2 of the Consultation Requirements, Urbis proposes to compile a list of Aboriginal people and organisations who may hold cultural knowledge relevant to determining the significance of Aboriginal objects and/or places that may exist within the subject area.



Should you be aware of any Aboriginal persons and/or organisations that may hold an interest in the project, please provide their details at your earliest convenience and preferably by 18 March 2022 in writing to:

Kirsten Downey
Consultant
Urbis Pty Ltd
Level 8 ,123 Pitt Street
Sydney NSW 2000
E: kdowney@urbis.com.au

Urbis, on behalf of the proponent will write to each Aboriginal person or group whose details are provided to notify them of the proposed project and invite them to register an interest in the community consultation process.

Please do not hesitate to contact us should you have any queries in relation to the provided information.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "M Walker", with a stylized flourish at the end.

Meggan Walker
Senior Consultant
+61 2 8233 7626
mwalker@urbis.com.au



Rowan Village, Wagga Wagga NSW
Aboriginal Cultural Heritage Assessment – Community Consultation Stage 1

Urbis has been commissioned by DevCore Property Group ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment (ACHA) of the Rowan Village site (hereafter referred to as the subject area). The subject area is within the City of Wagga Wagga Local Government Area and is on the traditional lands of the Wiradjuri People. The subject area is located at 7066 Holbrook Road, Rowan and comprises the following legally described parcels of land:

- DP 1054800 Lot 18.
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The Proponent can be contacted via:

Cameron Beames
Development Manager
DevCore Property Group
E: cameron@devcore.com.au

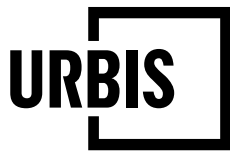
The ACHA will be conducted in accordance with the relevant guidelines under the *National Parks and Wildlife Act 1974*, including community consultation with registered Aboriginal parties. The assessment would detail any potential Aboriginal cultural heritage resources within the subject area and provide recommendations regarding management of those resources, and will inform an application for an Aboriginal Heritage Impact Permit (AHIP) should one be required. The ACHA is being prepared alongside a Cultural Values Assessment, which will identify and assist in the management of intangible cultural heritage at the site.

The Proponent is seeking the registration of Aboriginal persons or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) that may be present in the subject area.

Please register your interest in writing to the contact details provided below by 5.00pm 23rd March 2022.

Kirsten Downey
Consultant
Urbis Pty Ltd
Level 8 ,123 Pitt Street
Sydney NSW 2000
E: kdowney@urbis.com.au

Please be advised that the Proponent is required to forward the names of registered Aboriginal parties to Heritage NSW and Wagga Wagga Local Aboriginal Land Council unless the party specifies that they do not want their details released.



**ANGEL PLACE
LEVEL 8, 123 PITT STREET
SYDNEY NSW 2000**

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9 March 2022

To whom it may concern,

ROWAN VILLAGE– ABORIGINAL CULTURAL HERITAGE ASSESSMENT – ABORIGINAL COMMUNITY CONSULTATION STAGE 1.3 – INVITATION TO REGISTER

Please be advised that your contact details have been provided to us by Heritage NSW as an Aboriginal person or party who may have an interest in registering for the above project.

Urbis has been commissioned by DevCore Property Group ('the Proponent') to conduct an Aboriginal Cultural Heritage Assessment (ACHA) of Rowan Village site. The subject area is within the City of Wagga Wagga Local Government Area and is on the traditional lands of the Wiradjuri People. The subject area is located at 7066 Holbrook Road, Rowan and comprises the following legally described parcels of land:

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The ACHA is to inform a Planning Proposal to Wagga Wagga City Council for the redevelopment of the subject area, with work to be undertaken under a future local Development Application.

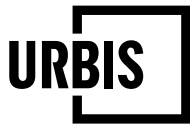
The Proponent can be contacted via:

Cameron Beames
Development Manager
DevCore Property Group
E: cameron@devcore.com.au

The ACHA will be conducted in accordance with the relevant guidelines under the *National Parks and Wildlife Act 1974*, including community consultation with registered Aboriginal parties. The assessment would detail any potential Aboriginal cultural heritage resources within the subject area and provide recommendations regarding management of those resources, and will inform an application for an Aboriginal Heritage Impact Permit (AHIP) should one be required. The ACHA is being prepared alongside a Cultural Values Assessment, which will identify and assist in the management of intangible cultural heritage at the site

The Proponent is seeking the registration of Aboriginal persons or groups who may hold cultural knowledge relevant to determining the significance of Aboriginal object(s) and/or place(s) that may be present in the subject area.

Please register your interest in writing to the contact details provided below by 5.00pm 23rd March 2022.



Kirsten Downey
Consultant
Urbis Pty Ltd
Level 8 ,123 Pitt Street
Sydney NSW 2000
E: kdowney@urbis.com.au

Following confirmation of your registration, Urbis will forward your name and contact details to Heritage NSW and Wagga Wagga Local Aboriginal Land Council, as required under the Consultation Requirements. If you do not want your details released, please advise us accordingly when registering your interest.

If you have any questions in relation to the foregoing, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "M Walker", with a stylized flourish at the end.

Meggan Walker
Senior Consultant
+61 2 8233 7626
mwalker@urbis.com.au

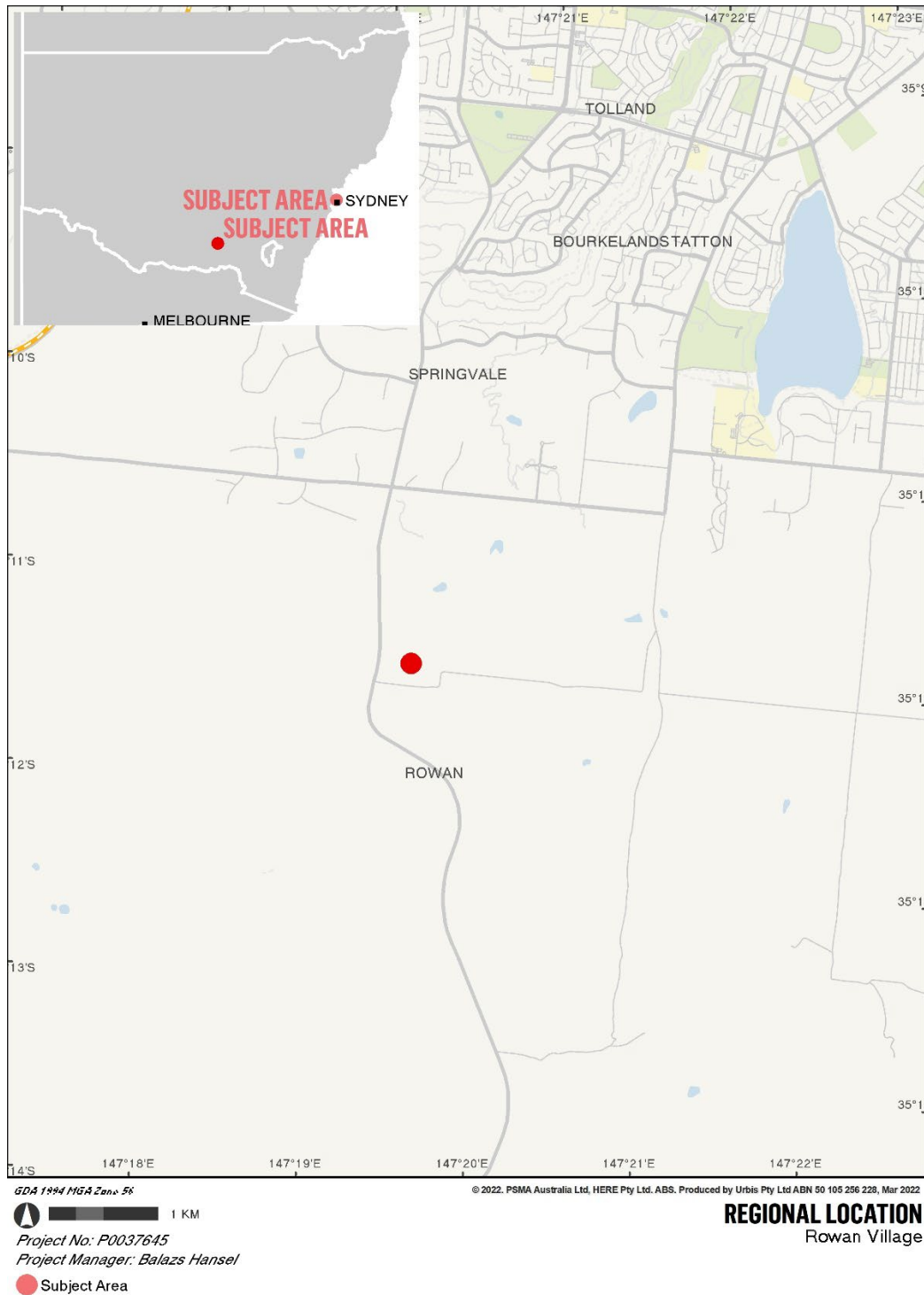
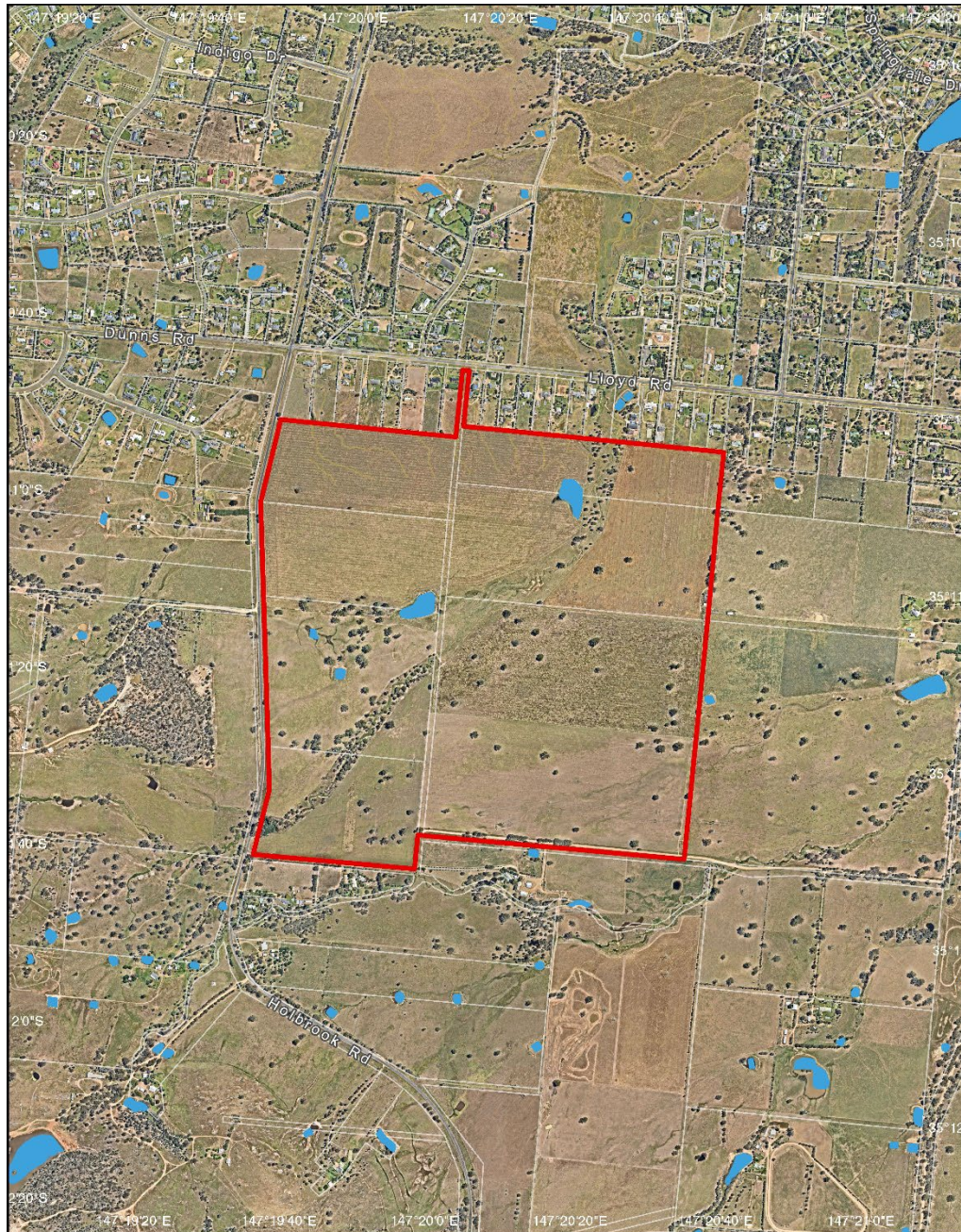


Figure 1 Regional location of the subject area



GD4 1994 MGA Zone 56

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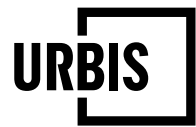
Project No: P0037645

Project Manager: Balazs Hansel

Subject Area Contours Hydrology

SUBJECT AREA
Rowan Village

Figure 2 Location of the subject area



APPENDIX B

METHODOLOGY PROVIDED FOR CVA



WATERS
CONSULTANCY

HISTORY • CULTURE • HERITAGE

Rowan Village Aboriginal Cultural Values Assessment Project: Draft

Methodology Date Issued: 8/4/22

The proposed approach for the Aboriginal intangible cultural heritage values assessment is to undertake consultation with the identified cultural knowledge holders within a context of historical and ethnographic research into the cultural values of the Project's potential impact areas (see Figure 1) and the wider area in which it is located. The methodology includes undertaking both:

- Consultation with the identified cultural knowledge holders regarding the cultural values of the study area and the specific potential impact zone.
- Historical research in documentary and audiovisual holdings of relevance to the cultural heritage of the study area and the specific potential impact zone.

Sources of historical and ethnographic information will include but are not limited to: archival land records; historical manuscripts; newspaper accounts; site records; and photographic evidence. The documentary and audiovisual holdings of the following institutions would be investigated:

- State Records of New South Wales.
- National Library of Australia.
- State Library and Mitchell Library of NSW.
- Australian Institute of Aboriginal and Torres Strait Islander Studies.
- Charles Sturt University Regional Archives.
- Heritage NSW (site and assessment records).

An ethnohistorical overview of the study area and the broader cultural landscape it sits within will be produced based on the available records. This overview will assist in the identification, contextualisation and assessment of cultural values within the study area.

Consultation with identified cultural knowledge holders is the central element in cultural values assessments. This recognises that consideration of intangible cultural heritage values and the assessment of significance can only occur through consultation with the relevant cultural communities and cultural knowledge holders.

Initial Consultation

Consultation will be initially undertaken with the Registered Aboriginal Parties (RAPs) to identify those individuals who are regarded as holding cultural knowledge for the Country within which the study area is located. Identified cultural knowledge holders may or may not be RAPs. The identified cultural knowledge holders will be contacted and their participation in the assessment process requested.

Informed Consent and Cultural Information Management

Cultural information management protocols, including formal consent agreements as required, will be developed in collaboration with the cultural knowledge holders to ensure sensitive information is treated appropriately and the moral rights of cultural knowledge holders are protected.

Interview Process

The identified cultural knowledge holders who are willing to participate will be interviewed to gather oral histories relevant to the cultural values and cultural landscapes of the study area. Interviews will be conducted with cultural knowledge holders as one-on-one Zoom and face-to-face meetings. Cultural mapping will occur both on-Country and using detailed aerial images and maps. It is recognised that information may be gender sensitive and a male and female consultant will be available to conduct interviews as appropriate.

The assessment of significance of the identified cultural places and landscapes will be undertaken through consultation with the cultural knowledge holders and consideration of the expressed traditional, historical, and contemporary cultural values. Consultation would be undertaken with the cultural knowledge holders in relation to appropriate management of any identified cultural values and cultural items within the potential Project impact zone. The development of mitigation measures for potential impacts on the identified cultural places within the study area will be undertaken collaboratively with the cultural knowledge holders and RAPs to reflect their knowledge and understanding of the cultural values.

Review of Draft CVAR

The draft Cultural Values Assessment Report (CVAR) will be provided to the cultural knowledge holders and the RAPs for a 28-day review period prior to finalisation. The proposed research and assessment process for this project has been developed with regard to the ICOMOS guidelines,¹ the United Nations FPIC guidelines,² the Aboriginal cultural heritage assessment guidelines of Heritage NSW,³ and the Indigenous engagement guidelines of the Department of Environment (Cmth).⁴

¹ See *The Burra Charter (The Australia ICOMOS Charter for Places of Cultural Significance, 2013)* and *Practice Note: The Burra Charter and Indigenous Cultural Heritage Management and Practice Note: Intangible Cultural Heritage & Place and Practice note: Understanding Cultural Routes*.

² See *Free Prior and Informed Consent: An indigenous peoples' right and a good practice for local communities*, Food and Agriculture Organization of the United Nations, 2016.

³ See *Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW*, Heritage NSW and *Aboriginal cultural heritage consultation requirements for proponents (2010)*, Heritage NSW.

⁴ See *Engage Early: Guidance for proponents on best practice Indigenous engagement for environmental assessments (2016)*, Department of the Environment, Commonwealth of Australia and *Ask First: A guide to respecting Indigenous heritage places and values (2002)*, Australian Heritage Commission.

[insert map of Project]

Figure 1: The yellow shading shows the potential project area

DRAFT