



## Aboriginal Heritage Office

Ku-ring-gai, Lane Cove, Manly, North Sydney, Pittwater,  
Warringah, Willoughby and City of Ryde Councils

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[www.aboriginalheritage.org](http://www.aboriginalheritage.org)

Thursday, 23 May 2013

Sue Guthrie  
A/Ranger (P/T)  
Ku-ring-gai Chase Area

### **Re: Proposed Mountain Bike Tracks in the Forestville and Bantry Bay Areas**

Reference is made to the proposed mountain bike tracks at the above area and Aboriginal heritage.

As you would know, across northern Sydney there are a number of unauthorised mountain bike tracks in bushland. There are also a number of documented Aboriginal rock engraving sites that have been impacted by these activities and there are no doubt other sites not yet documented that are being affected.

The Aboriginal Heritage Office (AHO) generally supports mountain bike tracks where there has been significant past disturbance to the area, where there are no recorded sites in or adjacent to the area, and new tracks would not pass through areas of high potential for unrecorded Aboriginal heritage.

The current proposal for Forestville and Bantry Bay includes Council reserve and National Park. There are many recorded Aboriginal sites in the proposed mountain bike track area and the area is considered to have extremely high potential for unrecorded sites.

The Aboriginal Heritage Office has been asked to review the Aboriginal heritage assessment reports for the proposal (including the recent report 'An Archaeological Survey of Bantry Bay Mountain Bike Track Realignment' by Michael Jackson, 22/05/13). The AHO is a partnership of eight local Councils, including Warringah Council, and can comment on proposals that are likely to affect Aboriginal heritage in those Council areas. Potential or existing impacts to Aboriginal sites within National Parks is a matter for the National Parks Areas and the Office of Environment and Heritage. However, in this case the proposed tracks link Council and National Parks reserves and some Aboriginal sites are at border areas. Changes to users of the National Parks could also affect impacts to Council reserves. For these reasons the AHO is providing a more regional view of the potential impacts.

Firstly, the report versions that the AHO has received do not have any Aboriginal community letter attached. The views of the Aboriginal custodians should be considered (it should be noted that there are no registered Traditional Owners for this area therefore the Metropolitan Local Aboriginal Land Council is the appropriate body to contact).

In terms of the archaeological assessment reports that the AHO has seen, there are over 20 Aboriginal sites recorded in the proposed biking track areas and an additional five sites were identified during the archaeological surveys. Some recorded sites understood to be on or adjacent proposed tracks were not found.

The assessments note that archaeological visibility (or effective survey coverage) was severely restricted in many areas due to vegetation cover. Despite the very poor visibility the 2 reports that the AHO has viewed both have identified previously unrecorded sites during survey work, illustrating the high site density of the area.

The most recent report does not mention survey conditions and whether the lighting was adequate or suitable with which to locate rock engravings (petroglyphs), and the original report only mentions such conditions once, when referring to direct sunlight hampering the 'effective shadow relief'. The earlier report includes a map that shows the location of sites according to AHIMS (Aboriginal Heritage Information Management System, the OEH's register), and the AHO is aware that 2 of those locations in Forestville are over 100m in error (the other sites have not been checked as they are not part of the AHO's review region).

Both reports note that visitation may increase to sites near the proposed bike tracks. The Jackson report provides a scientific assessment of significance for four of the newly discovered sites, however, this assessment is not explained clearly.

In terms of the Kangaroo rock engraving at the boundary of Forestville Reserve and Garigal National Park (which the AHO, Council, Garigal NP and the MLALC has been trying to protect for some time from mountain bike traffic), the AHO supports the closing of the track from mountain bikes and redirecting traffic to the north, along existing disturbed areas and through Forestville oval. The AHO would not normally recommend cutting new tracks in areas of undisturbed bushland, particularly in areas of such high Aboriginal heritage sensitivity.

The Aboriginal Heritage Office would support a proposal that seeks to remove unauthorised bike use from bushland and re-use and rehabilitate disturbed areas. The AHO also supports improving community education regarding the natural environment and Aboriginal heritage and would welcome any initiative as part of this process that helped mountain bikers understand how to avoid damaging and how to help protect Aboriginal sites.

If you have any queries, please contact me on (02) 9949 9882.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Watts', with a small mark below it.

David Watts  
Aboriginal Heritage Manager