

PROPOSED ADDITIONAL GRAIN STORAGE AND HANDLING
FACILITIES SHOALHAVEN STARCHES EXPANSION PROJECT
(MOD 26), BOMADERRY NSW

HERITAGE IMPACT STATEMENT

Report to Allen Price on behalf of the
Manildra Group of Companies

LGA: Shoalhaven

October 2025





EXECUTIVE SUMMARY

Apex Archaeology have been engaged to assist Allen Price on behalf of the Manildra Group of Companies to prepare a Heritage Impact Statement (HIS) for the proposed additional Grain Storage and Handling Facilities. This report has been prepared in support of a modification application (Mod 26) to the Department of Planning and Environment (DPE) to modify their Project Approval for the Shoalhaven Starches Expansion Project (SSEP). It is understood that the modification would enable the following:

- The additional grain storage capacity will provide a raw material storage buffer which will reduce the risk from disruptions to supply following transport difficulties, floods (as has occurred recently), droughts and maintenance.
- Shoalhaven Starches will be able to separate different grades of wheat. This will enable different grades of wheat to be stored separately allowing a more consistent raw material feed to the Shoalhaven Starches factory operations increasing plant efficiencies throughout.
- Wheat will be able to be delivered to the site safely and efficiently via either road or rail.
- Regular maintenance and cleaning of the wheat storage system will be able to be carried out without impeding production processes.
- Shoalhaven Starches will be able to undertake more efficient cleaning of the wheat storage reducing wastage.

This HIS has been prepared with reference to the *NSW Heritage Manual 1996* and the associated Heritage Branch guideline *Assessing Significance for Historical Archaeological Sites and 'Relics'*, 2009. It has also been prepared with reference to the Australia ICOMOS Charter for Places of Cultural Significance 2013, known as The Burra Charter.

The study area is located within Bomaderry, NSW (Figure 1). The study area is located approximately 125 km south west of Sydney. It is located within the Shoalhaven Local Government Area (LGA). The site is legally defined as Lot 1 DP 838753, Lot 241 DP 1130535, Lot 143 DP 1069758, Lot X DP 421658, Lot 1 DP 3885 and Lot 1 DP385145 and is bound by Bolong Road to the north and the Shoalhaven River to the south. Additionally, a rail maintenance building is proposed to be constructed within Lot 102 DP 1283484. The study area itself comprises the location of proposed additional Grain Storage and Handling Facilities within the existing main factory area.

A site visit was conducted on Wednesday 22 June 2022.

During the assessment, it was found:

- The study area is not listed as an item of historical heritage.



- One heritage item of local significance is located approximately 500m to the north west of the study area, comprising the Bomaderry Railway Station and yard group, along with the former Bomaderry Milk Factory, which is located approximately 500m west of the study area.
- Two additional heritage items are located approximately 900m to the east and north east of the rail maintenance building study area, comprising the Berry Estate vertical timber slab cottage and outbuildings, and “Beuna Vista” – dairy farm complex including Berry Estate vertical timber slab barn.
- No newly identified items of historical heritage were noted within the study area.
- It is proposed to build additional Grain Storage and Handling Facilities within the existing site.
- The proposed development would not impact on any of the listed heritage sites in the wider vicinity.
- The study areas are not considered to have archaeological potential.
- Overall, it is not considered that the proposed works would have any impact on the heritage significance of the listed sites in the wider vicinity of the study areas.

The following recommendations have been made for this project:

The proposed works are not considered likely to impact on the heritage values of any items within or adjacent to the study areas. No further archaeological or heritage assessment is required for the project.

Should unanticipated archaeological material be encountered during site works, all work must cease and an archaeologist contacted to make an assessment of the find. Further archaeological assessment may be required prior to the recommencement of works. Any historical objects must be reported to Heritage NSW.



Apex Archaeology would like to acknowledge the Aboriginal people who are the traditional custodians of the land in which this project is located. Apex Archaeology would also like to pay respect to Elders both past and present.

DOCUMENT CONTROL

The following register documents the development and issue of the document entitled 'Proposed additional Grain Storage and Handling Facilities, Shoalhaven Starches Expansion Project (Mod 26), Bomaderry – Heritage Impact Statement', prepared by Apex Archaeology in accordance with its quality management system.

Revision	Prepared by	Reviewed by	Comment	Issue Date
1 – Draft	Leigh Bate	Jenni Bate	Client Review	6 July 2022
2 – Final	Leigh Bate	Stephen Richardson	Final issued to client	11 July 2022
3 – Final	Jenni Bate	Leigh Bate	Minor updates	5 February 2024
4 – Final	Jenni Bate	Leigh Bate	Minor updates	23 October 2025



GLOSSARY OF TERMS

CHL	Commonwealth Heritage List
CHM	Cultural Heritage Management
CMP	Conservation Management Plan
DA	Development Application
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DCP	Development Control Plan
Disturbed Land	If land has been subject to previous human activity which has changed the land's surface and are clear and observable, then that land is considered to be disturbed
DPE	Department of Planning and Environment
EP&A Act	The NSW <i>Environmental Planning and Assessment Act 1979</i>
GIS	Geographical Information Systems
Heritage Act	The NSW <i>Heritage Act 1977</i>
Heritage NSW	Heritage NSW in the Department of Climate Change, Energy, the Environment and Water, responsible for all heritage matters in NSW.
HIS	Heritage Impact Statement
LEP	Local Environmental Plan
LGA	Local Government Agency
NHL	National Heritage List
NSW	New South Wales
OEH	The Office of Environment and Heritage– now Heritage NSW
POM	Plan of Management
SCC	Shoalhaven City Council
SEPP	State Environmental Planning Policy
SHI	State Heritage Inventory
SHR	State Heritage Register
SSEP	Shoalhaven Starches Expansion Project
WWTP	Waste Water Treatment Plant



CONTENTS

1.0	Introduction	1
1.1	Methodology	1
1.2	Study Area	1
1.3	Objectives	2
1.4	NSW Heritage Legislation	5
1.4.1	Heritage Act 1977	5
1.4.2	Shoalhaven Local Environmental Plan 2014	5
1.5	Authorship	8
1.6	Limitations	8
2.0	Historical Context	9
2.1	Indigenous Context	9
2.2	European Settlement	9
2.3	Documentary Evidence	11
2.4	Shoalhaven Starches Plant	14
2.5	Shoalhaven Paper Mill	14
3.0	Physical Evidence	15
3.1	Site Inspection	15
3.2	Site Description	17
4.0	Assessment of Significance	18
4.1	Understanding Heritage Significance	18
4.2	Heritage Significance	18
4.3	Assessment of Criteria	19
4.4	Statement of Significance	20
5.0	Statement of Heritage Impact	21
5.1	Proposed Development	21
5.2	Potential Impact	22
5.3	Impact Assessment	23
6.0	Conclusions and Recommendations	24
6.1	Conclusions	24
6.2	Recommendations	24
7.0	Bibliography	25



FIGURES

Figure 1: General location of the proposed development in its local context.....	3
Figure 2: Proposed development layout – Proposed additional Grain Storage and Handling Facilities (Source: Manildra Group 2025).....	4
Figure 3: Heritage Items in vicinity of study area	6
Figure 4: Detail of Map of the County of Camden, Eastern Division, N.S.W 1895. Approx study area circled in red.....	11
Figure 5: Parish of Bunberra County of Camden 1903	12

PLATES

Plate 1: 1969 aerial imagery. Study area shown in red (Source: HINSW)	12
Plate 2: 1979 aerial imagery. Study area shown in red (Source: HINSW)	13
Plate 3: 1993 aerial imagery of study area.	13
Plate 4: 1993 aerial imagery of eastern portion study area shown in red (Source: HINSW).	14
Plate 5: View west across existing facilities within site.	15
Plate 6: View along existing train line adjacent to the river bank.	15
Plate 7: View south west along existing train line on banks of river.....	16
Plate 8: View north east along the existing train line and associated infrastructure.	16
Plate 9: View north east over proposed waste water treatment plant water basin location.	17



1.0 INTRODUCTION

Apex Archaeology have been engaged to assist Allen Price on behalf of the Manildra Group of Companies to prepare a Heritage Impact Statement (HIS) for the proposed additional Grain Storage and Handling Facilities. This report has been prepared in support of a modification application (Mod 26) to the Department of Planning and Environment (DPE) to modify their Project Approval for the Shoalhaven Starches Expansion Project (SSEP).

1.1 METHODOLOGY

This HIS has been prepared with reference to the *NSW Heritage Manual 1996* and the associated Heritage Branch guideline *Assessing Significance for Historical Archaeological Sites and 'Relics'*, 2009. It has also been prepared with reference to the Australia ICOMOS Charter for Places of Cultural Significance 2013, known as The Burra Charter.

1.2 STUDY AREA

The study area is located within Bomaderry, NSW (Figure 1). The study area is located approximately 125 km south west of Sydney. It is located within the Shoalhaven Local Government Area (LGA). The site is legally defined as Lot 1 DP 838753, Lot 241 DP 1130535, Lot 143 DP 1069758, Lot X DP 421658, Lot 1 DP 3885, Lot 1 DP385145, part Lot 4 DP610696, and part Lots 1& 2 DP842231. Additionally, a rail maintenance building is proposed to be constructed within Lot 102 DP 1283484. The study area itself comprises the location of proposed additional Grain Storage and Handling Facilities within the existing main factory area.

The study area itself comprises the location of the proposed feed to existing grain storage, maintenance workshop, conveyor to plant, L.V. Substation, Workshop and Amenity, Train Unloader and Loading, Container Storage, Weighbridge, Grain Storage, Train un-loader, relocated existing car park and H.V. Substation within the existing main factory area on the southern side of Bolong Road (Figure 2), as well as upgrades to an existing wastewater treatment plant on the northern side of Bolong Road.

It is understood that the modification would enable the following:

- The additional grain storage capacity will provide a raw material storage buffer which will reduce the risk from disruptions to supply following transport difficulties, floods (as has occurred recently), droughts and maintenance.
- Shoalhaven Starches will be able to separate different grades of wheat. This will enable different grades of wheat to be stored separately allowing a more consistent raw material feed to the Shoalhaven Starches factory operations increasing plant efficiencies throughout.



- Wheat will be able to be delivered to the site safely and efficiently via either road or rail.
- Regular maintenance and cleaning of the wheat storage system will be able to be carried without impeding production processes.
- Shoalhaven Starches will be able to undertake more efficient cleaning of the wheat storage reducing wastage.

1.3 OBJECTIVES

The objectives of the HIS are to:

- Confirm the heritage status of the study area and understand the history of the study area within the broader cultural landscape;
- Describe the current physical state of the study area;
- Assess the potential heritage significance of the study area;
- Assess the potential impact of the proposed redevelopment on the heritage values of the adjacent heritage listed dwelling; and
- Outline an appropriate method to manage any potential impacts on heritage values.



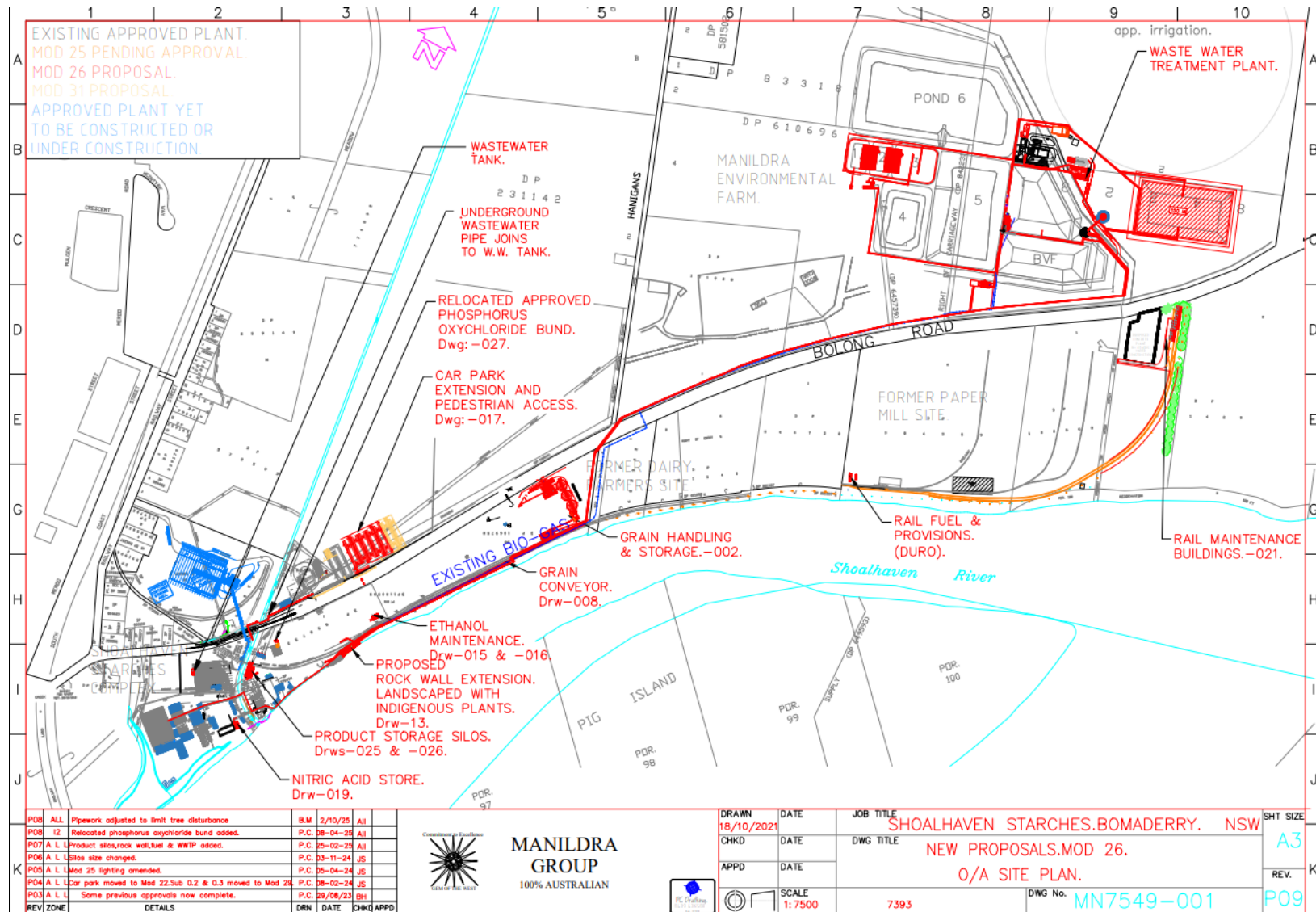


Figure 2: Proposed development layout – Proposed additional Grain Storage and Handling Facilities (Source: Manildra Group 2025)



1.4 NSW HERITAGE LEGISLATION

1.4.1 HERITAGE ACT 1977

The *Heritage Act 1977* (as amended) (the Heritage Act) provides protection for historical archaeological deposits, relics, structures, buildings, and features within NSW. These may be identified on the State Heritage Register (SHR) or an active Interim Heritage Order.

Under the Heritage Act, the Minister appoints the Heritage Council, which is responsible for heritage in NSW. The Council includes community, conservation and government experts. The Heritage Division provides operational support to the Council and helps communities to identify important heritage places and relics, as well as guidance on how to provide care for those items. It also provides funding and support for community heritage projects and maintains the NSW Heritage Database, which is a list of all heritage items included on statutory heritage lists within NSW.

Guidance for undertaking heritage assessments is provided by the NSW Heritage Division 1996 NSW Heritage Manual, and includes criteria to assist in assessing the significance of items.

There are no items listed under the Heritage Act within the study area. One item listed on the State Heritage Register, the Bomaderry Railway Station and yard group, is located approximately 500m north west of the study area.

1.4.2 SHOALHAVEN LOCAL ENVIRONMENTAL PLAN 2014

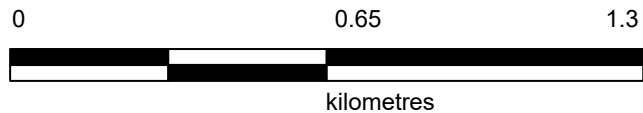
The Shoalhaven LEP 2014 guides heritage conservation and assessment within the Shoalhaven LGA, with a number of heritage clauses included. Clause 5.10(2)(e) identifies that no buildings may be erected on land within a heritage conservation area or which contains an Aboriginal object, without first obtaining development consent. Further, Clause 5.10(2)(c) states that archaeological sites may not be disturbed or excavated without development consent, and Clause 5.10(2)(f) states that development consent is required for the subdivision of land within a heritage conservation area, on which a heritage item is located, on which an Aboriginal object is located, or within an Aboriginal place of heritage significance. Exceptions to the requirement for development consent are detailed by Clause 5.10(3) and include low impact activities, or activities for the maintenance of a heritage item.

Clause 5.10(4) requires that the effect of any development on a heritage item or heritage conservation area must be considered, and 5.10(5) details that a heritage assessment is required for land which is within a heritage conservation zone.

The study area is not listed as an item of heritage significance on the Shoalhaven Local Environmental Plan 2014 (Figure 3). A number of listed sites are located within the township of Bomaderry to the north west of the western portion of the study area and to the north east of the eastern portion of the study area.



PO Box 236
NOWRA
NEW SOUTH WALES 2541



Projection:
MGA Zone 56 (GDA 94)
Base Map:
Near Maps 2025
Image Date: 05/07/2025
Final - Version 1

Figure 3: Heritage Items in proximity to the study area.





SHOALHAVEN DEVELOPMENT CONTROL PLAN 2014

The Shoalhaven Development Control Plan (DCP) 2014 guides development within the Shoalhaven region. It provides guidelines for the environmental assessment of proposed developments and ensures that the developments do not adversely impact the environment. Chapter 2 of the DCP outlines general and environmental considerations, including heritage concerns.

Section 3.2 outlines the requirements for consideration of European heritage as part of a development approval. The objectives of the DCP are to:

- i. Ensure the significance of heritage items is identified and retained;
- ii. Ensure the special streetscape, pastoral or natural character of the conservation areas is maintained;
- iii. Ensure alterations and extensions to existing buildings respect those buildings and do not compromise the significance and character of the individual items or of the conservation areas;
- iv. Ensure new development respects its context and is sympathetic in terms of form, scale, bulk, fabric, colours and textures and does not mimic or adversely affect the significance of heritage items and conservation areas and their settings;
- v. To encourage a high quality of design for any new development in achieving compatibility with the heritage significance of individual heritage items and conservation areas;
- vi. Provide guidelines for assessment of demolition applications.

Relevant to the study area is section 3.3.3 Development in the Vicinity of a Heritage Item, which states:

Where development is to occur within the vicinity of a heritage item Council must make an assessment of the effect the carrying out of that development would have on the significance of the heritage items, its site and its setting. Such developments will need to provide a heritage impact statement...addressing the effect of the development.

Section 3.3.5 Heritage Impact Statements is also of relevance, as it outlines the requirements of what should be included in a Heritage Impact Statement. This section states:

The Heritage Impact Statement should be prepared in accordance with NSW Heritage Manual 'Statements of Heritage Impact' and "Assessing Heritage Significance Guidelines" and the principles of The Burra Charter. It should include a Statement of Significance which is a concise summary of the cultural significance of a place and includes an assessment of aesthetic, historic, scenic and cultural values and comparative criteria. The Heritage Impact Statement should address:

- *The history and development of the place.*
- *The fabric of the place in terms of its original configuration and later alterations.*
- *The cultural significance of the place.*



- *A description of the proposed works.*
- *An assessment of the impact of the proposed works on the cultural significance of the item or place.*

Although Council is not the consent authority in this instance, the requirements of the DCP are useful for informing any assessment of historical heritage significance within a site.

1.5 AUTHORSHIP

This HIS has been prepared by Jenni Bate, Director and Archaeologist with Apex Archaeology, and Leigh Bate, Director and Archaeologist with Apex Archaeology. Both have over eighteen years of consulting experience within NSW.

Name	Role	Qualifications
Jenni Bate	Project Manager, Report Author	B.Archaeology; Grad. Dip. CHM
Leigh Bate	GIS, Field inspection, Review	B.Archaeology; Grad. Dip. Arch; Dip. GIS

1.6 LIMITATIONS

This HIS focuses on European cultural heritage values within the study area. Apex Archaeology acknowledges that Aboriginal people have occupied this land for over sixty thousand years, and their culture is living and ongoing.

Recommendations are based on the available documentary evidence, as well as an inspection of the existing fabric on site. Further detailed historical research was outside the scope of this project.



2.0 HISTORICAL CONTEXT

2.1 INDIGENOUS CONTEXT

Ethnohistorical evidence is based on the reports of colonisers and do not tend to include the Aboriginal perspective, leading to a Eurocentric view of Aboriginality. Additionally, historical records can be contradictory and incomplete regarding the exact tribal boundaries and locations of ceremonial or domiciliary activities of Aboriginal people pre-contact within the South Coast region. Boot (2002:58) notes:

The problem associated with ethnohistoric documents include their tendency to record unusual, rather than everyday events, and their focus on religious behaviour to the exclusion of woman and children (Attenbrow 1976:34; Sullivan 1983:12.4).

As a result, there are several versions of the Aboriginal history prior to colonisation, mostly due to differing records made in the historical period. Howitt (1904) defined the Yuin tribal area as extending from Cape Howe in the south to the Shoalhaven River in the north.

In contrast, other historical records made by early colonists indicate the study area is located within lands traditionally occupied by the Wodi Wodi people (Tindale 1974). The Shoalhaven River was considered to be a border between the Wodi Wodi and the Wandandian people. The Wodi Wodi spoke Dharawal, and the Wandandian spoke Dhurga. It is noted that the Wandandian people were considered to have occupied an area extending from the Shoalhaven River south to Ulladulla (Tindale 1974) while the Wodi Wodi lived in the area between the Shoalhaven River north to Wollongong, and as far inland as Moss Vale.

However, some members of the Aboriginal community dispute these associations and claim the area falls within the lands of the Jerrinja tribe, which extends from Crooked River in the north to the Clyde River in the south. The Jerrinja tribe have been referred to as the “Saltwater people of the Shoalhaven” (Penfold 2017).

As such, it is difficult to make definitive claims regarding the history of the people who once inhabited the area. However, it is acknowledged that a thriving Aboriginal population inhabited the area prior to colonisation, and the arrival of European settlers dramatically and negatively impacted the Aboriginal people of Australia.

2.2 EUROPEAN SETTLEMENT

Following the establishment of the first European settlement at Sydney Cove, the need for additional agricultural land was identified, as Sydney Cove was considered unsuitable for farming. By November 1788, food supplies were running low for the settlement, and an expedition led by Governor Philip set off up the Parramatta River in search of arable land. An area known as Rose Hill (now Parramatta) was settled by a small group of 11 soldiers and 10 convicts. The grain crops at Sydney Cove failed, and the settlement at Rose Hill was ordered to be used for agriculture. These



crops were luckily successful, and a further settlement comprising a convict farm was established at Toongabbie.

Exploration of the wider region continued, and in 1791, expeditions travelled the Hawkesbury and Nepean areas, identifying them as likely spots for agriculture. The Shoalhaven region had been sighted by Captain Cook in April of 1770, when he observed a protected bay which was later named Port Jervis, and he recorded evidence of smoke along the shoreline just before dark, which may have been related to Aboriginal campfires near the area now known as Bass Point.

Lieutenant James Grant recorded an account of an early meeting of Europeans and local Aboriginal people as being amicable (Grant 1801), with the Aboriginal people they encountered described as 'more robust than Sydney Blacks'.

James Meehan reached the Shoalhaven River in 1805 as part of his exploration of the region, and noted the extensive stands of red cedar along the lower reaches of the river (Antill 1982). The first official shipment of cedar left the Shoalhaven in 1811, and by the following year seven ships were transporting cedar out of the Shoalhaven.

The Cambewarra and Illawarra Ranges were first explored by Europeans in 1812, by surveyor George Evans. This included a survey of the Jervis Bay foreshores and Evans intended to return overland to Appin, but the difficulty of the terrain led to him abandoning this plan (Griffith 1978). In 1818, James Meehan and Charles Throsby were commissioned to find an overland route between Sydney and Jervis Bay, and a route through Kangaroo Valley was identified with the assistance of two Aboriginal people from the Lake Illawarra region.

Alexander Berry explored the Shoalhaven River environs over several days in 1822, and, together with his business partner Edward Wollonstonecraft, was later granted 10,000 acres on the northern side of the Shoalhaven River with the aim of establishing a permanent settlement. Berry's settlement was located on elevated land at the foot of a hill now known as Coolangatta. By 1840, the estate had increased to around 32,000 acres, and was more than 40,000 acres by 1863. Coolangatta Estate supplied much of the cedar sold in Sydney, as well as maize, tobacco, wheat, barley and potatoes, along with pigs and cattle (Perry 1966).

Following Wollonstonecraft's death in 1832, Berry began to lose interest in the estate, writing as much in 1846 (Perry 1966). The abolition of transportation of convicts and the discovery of gold in the 1850s further decreased Berry's interest in the area, and he began letting farms on clearing leases.

By 1850, the major industries of the Shoalhaven region included agriculture, dairying and milling (Cousins 1994), as well as timber felling. Subdivision of the Berry Estates in 1892 led to many tenant farmers purchasing their portions of land.

2.3 DOCUMENTARY EVIDENCE

A map of the County of Camden, Eastern Division, dating to 1895 (Figure 4), shows the study area as being within one portion owned by John Berry, with one lot of 1082 acres.

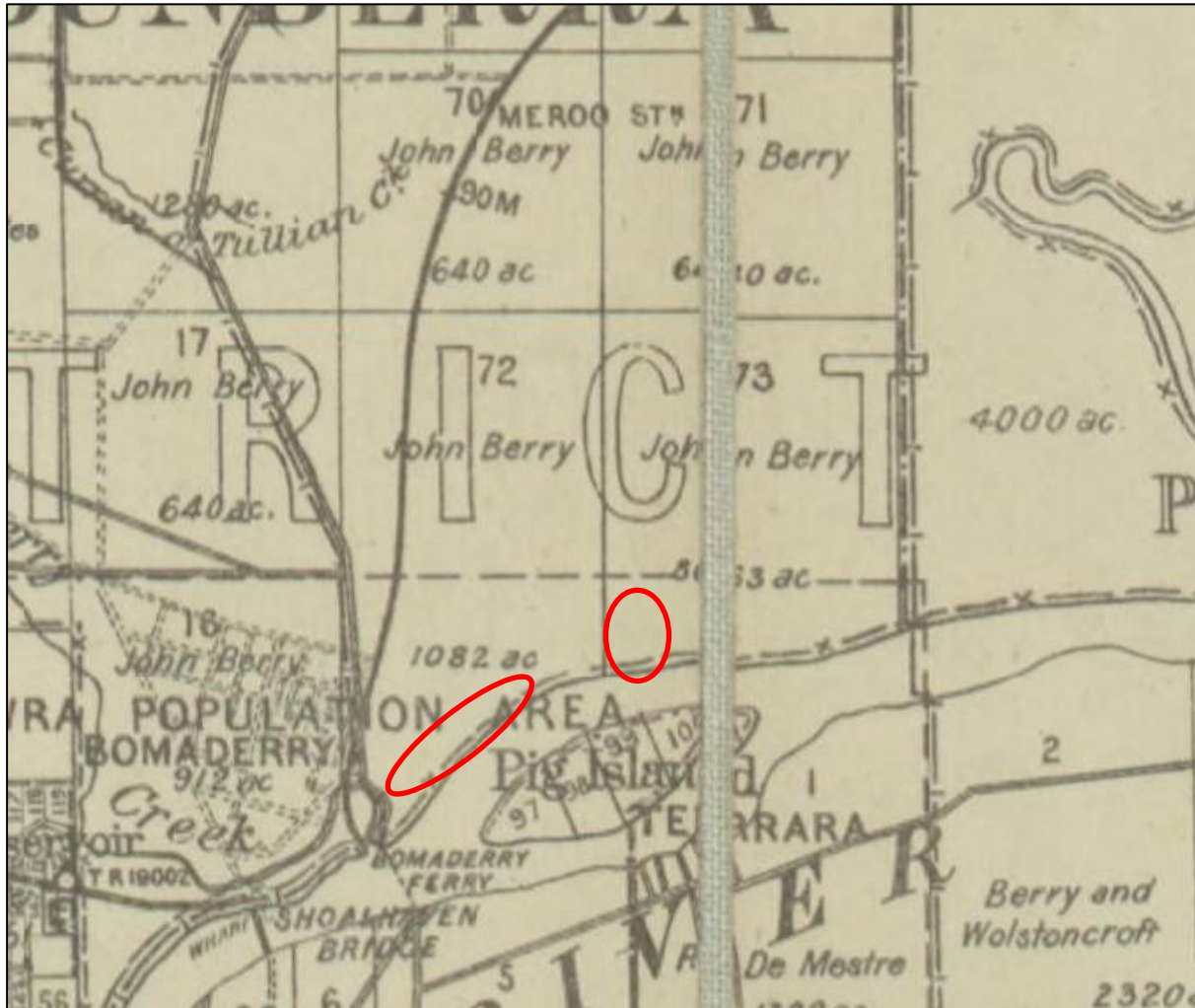


Figure 4: Detail of Map of the County of Camden, Eastern Division, N.S.W 1895. Approx study area circled in red

The earliest available parish map for the area, dating to 1903, shows subdivision within John Berry's lots (Figure 5) but the current lot layout is not visible until later.

Historical aerial imagery shows the study area containing some development from 1969, although some parts remain undeveloped. By 1993, the entirety of the study area for the proposed additional Grain Storage and Handling Facilities contained a range of buildings.

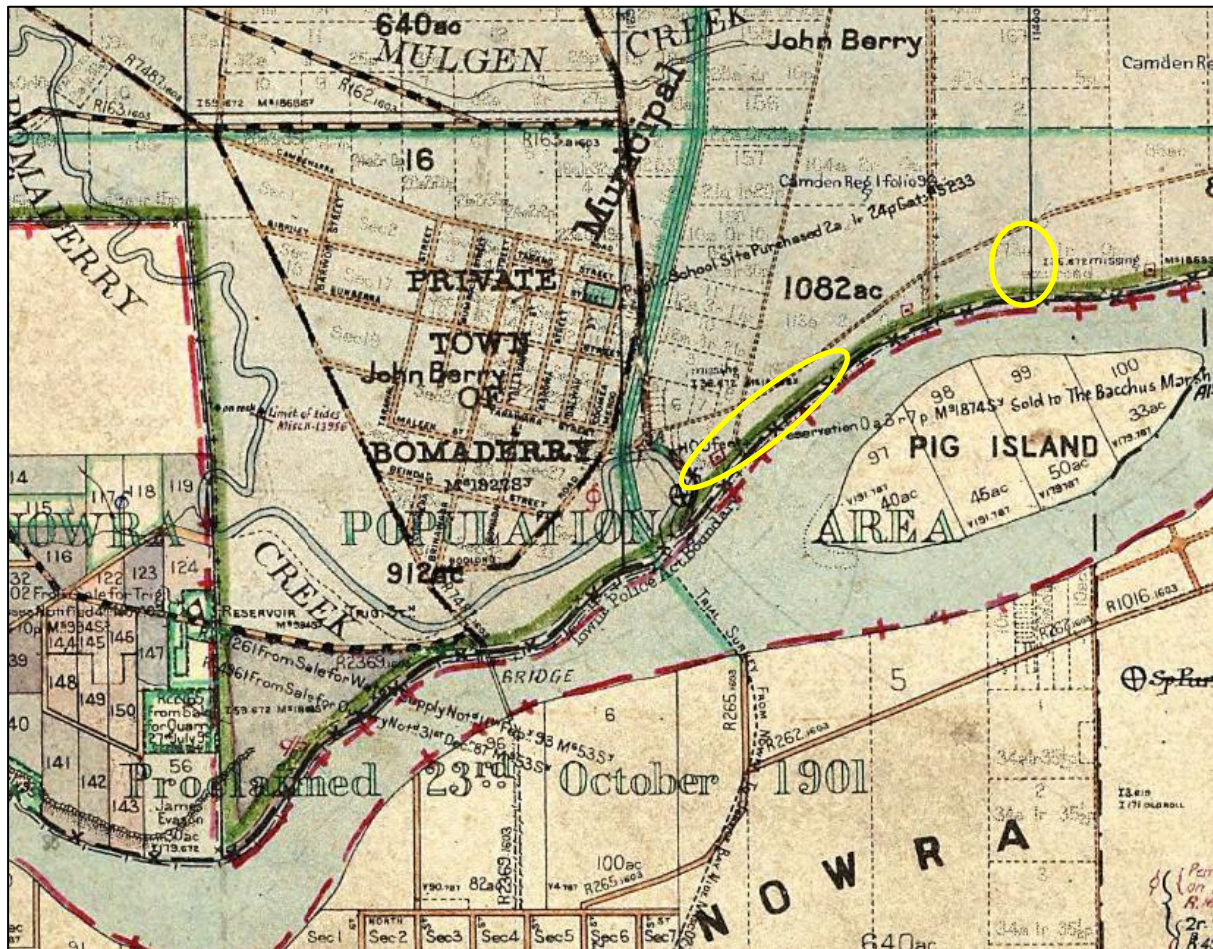


Figure 5: Parish of Bunberra County of Camden 1903

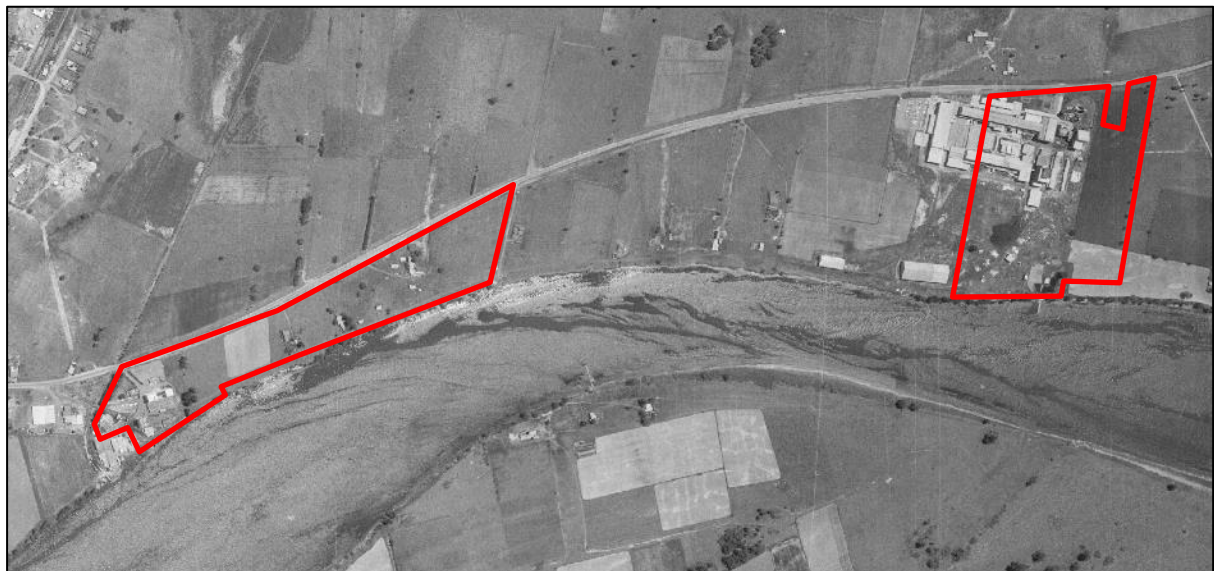


Plate 1: 1969 aerial imagery. Study area shown in red (Source: HINSW)



Plate 2: 1979 aerial imagery. Study area shown in red (Source: HINSW)



Plate 3: 1993 aerial imagery of study area.



Plate 4: 1993 aerial imagery of eastern portion study area shown in red (Source: HINSW)

2.4 SHOALHAVEN STARCHES PLANT

The Shoalhaven Starches plant was constructed in 1970, to produce wheat starch and gluten. The Manildra flour mills provide the flour for the Shoalhaven Starches factory. Aside from starch and gluten, the factory also produces syrups and ethanol, both industrial and fuel grades. Excess starch was used to produce ethanol, which commenced at the plant in 1992, and was approved for expansion in 1994 in order to increase production from 20 million litres per annum to 100 million litres per annum.

By 2009, approval had been received for construction of a flour mill within the factory site, along with other modifications to the existing approvals as part of the Shoalhaven Starches Expansion Project. This included an increase in ethanol production to 300 million litres per year. This ethanol is used for hand sanitizer grade alcohol, as well as beverage grade ethanol.

2.5 SHOALHAVEN PAPER MILL

The Shoalhaven Paper Mill was constructed in the 1950s to produce specialised security grade papers. The original cost of the building was £10m. The factory had a train line to bring in coal to provide power for the mills. The rail line appears to have been decommissioned and partially removed within Lot A DP384559, although the date of this is not clear. Following a decline in the demand for the specialised papers produced at the mill, the factory closed in 2015.

3.0 PHYSICAL EVIDENCE

3.1 SITE INSPECTION

The study area was inspected on 22 June 2022. A subsequent inspection of the proposed WWTP on the northern side of Bolong Road was completed on 12 September 2025. The following photographs were taken at these times.



Plate 5: View west across existing facilities within site.



Plate 6: View along existing train line adjacent to the river bank.



Plate 7: View south west along existing train line on banks of river.



Plate 8: View north east along the existing train line and associated infrastructure.



Plate 9: View north east over proposed waste water treatment plant water basin location.

3.2 SITE DESCRIPTION

In general, the study area comprises a relatively level, cleared site, located adjacent to the Shoalhaven River and along Bolong Road, Bomaderry within the main Shoalhaven Starches factory. The Shoalhaven Starches factory site has been heavily developed since its construction in the 1970s, and the area proposed for development has been impacted through previous construction work.

The study area for the proposed additional Grain Storage and Handling Facilities is not located within or adjacent to any listed heritage sites. The closest listed heritage item, comprising the Bomaderry Railway Station and yard group, is approximately 500m to the north west of the study area; and the former Bomaderry Milk Factory is located just to the south of the railway station, approximately 500 west of the study area. The proposed works are located within the existing infrastructure of the main complex.

The rail maintenance building is also not located within or adjacent to any previously listed heritage sites, although two sites are located to the east of the study area; namely the Berry Estate vertical timber slab cottage and outbuildings, and “Beuna [sic] Vista” dairy farm complex including Berry Estate vertical timber slab barn.

The Waste Water Treatment Plant (WWTP) is an existing facility which is proposed to be expanded, and is not located in immediate proximity to any listed heritage items. As above, the WWTP is in proximity to the Berry Estate vertical timber slab cottage and outbuildings, as well as the “Beuna Vista” dairy farm complex including Berry Estate vertical timber slab barn.



4.0 ASSESSMENT OF SIGNIFICANCE

4.1 UNDERSTANDING HERITAGE SIGNIFICANCE

All places have unique combinations of values, and as such it is important to understand these values prior to making decisions about the future of a heritage item. This way heritage values can be retained when making decisions relating to the future management of a place.

A statement of heritage significance is prepared to summarise an item's heritage values.

4.2 HERITAGE SIGNIFICANCE

The study area is not listed as items of heritage significance. There are no heritage items in the immediate vicinity of the study area. However, there are two listed sites located approximately 500m to the north west and west of the study area.

The heritage data sheet (HDS) for the Bomaderry Railway Station and yard group, which is listed on the SHR, contains the following statement of significance for the item:

The Bomaderry Railway Station and Yard group is of State historical significance as a significant collection of railway structures and machinery dating from 1893 to 1946 at an important terminus location with a significant history as a goods yard, and for its relationship with the development of Bomaderry and Nowra since 1893, including its role in the development of local industry.

The Bomaderry Railway Station 1946 platform building is of State aesthetic significance as one of the finest representative examples of an Inter-War Functionalist style Railway building in the state. It is particularly noteworthy for its use of curved elements, such as the projecting bay and awning. The Bomaderry turntable is rare (one of 3 turntables now extant on the Illawarra line - Bomaderry, Waterfall and Kiama).

The Bomaderry Station Master's residence (1893) is of State historical significance as evidence of late 19th century railway operational requirements to accommodate railway staff on site at railway stations, as one of the few remaining structures at the Bomaderry railway terminus dating from 1893, and as a now rare design of station master's residence, the design of which has historical association with the office of Henry Deane, Engineer-in-Chief of Railways Construction 1891-1901. Bomaderry station master's residence is of aesthetic significance as a simple vernacular weatherboard Victorian Georgian style house, purpose-built for the accommodation of railway staff.

The HDS for the former Bomaderry Milk Factory contains the following statement of significance for the item:

Industrial dairy processing complex illustrating the close relationship which developed between the dairy industry in Shoalhaven and the rail way line linking the Illawarra with Sydney. A graphic symbol of the dependence of Shoalhaven on



the dairying industry. Historic, aesthetic and social value. Local significance (Shoalhaven).

The HDS for the Berry Estate vertical timber slab cottage and outbuildings (item 116) contains the following statement of significance for the item:

The cottage is significant as an intact remaining Berry Estate tenants cottage dating from earliest settlement in the 1860s. It is representative of the increasingly rare examples in the area of slab construction used for residential building. Local significance (Shoalhaven).

The HDS for Beuna Vista - dairy farm complex including Berry Estate vertical timber slab barn (spelling taken directly from heritage listing) (item 117) contains the following statement of significance for the item:

Late nineteenth century or earlier timber farm building which remains in use. Possibly one of the many structures on the former Berry Estate of Coolangatta. Historic, social and research value. Local significance (Shoalhaven).

4.3 ASSESSMENT OF CRITERIA

The Heritage Council of NSW prepared a set of seven criteria for use in assessing heritage significance. Items are considered significant on two levels, these being State and local significance.

The following assessment of significance for the study area specifically has been prepared in accordance with the *Assessing Heritage Significance* 2001 guidelines issued by the NSW Heritage Division, specifically for the Grain Storage and Handling Facilities study area.

a) An item is important in the course, or pattern, of the local area's cultural or natural history

The development of the Shoalhaven Starches and the paper mill site have been relevant to the course of the Shoalhaven's history, due to providing significant employment opportunities to the region since the 1970s. However, the building in and of itself does not hold any specific value. Therefore, the subject site is considered to have limited significance under this criterion.

b) An item has strong or special associations with the life or works of a person, or a group of persons, of importance in the local area's cultural or natural history

Neither study area is considered to hold specific value under this criterion, although it is noted that both the Shoalhaven Paper Mill and the Shoalhaven Starches areas were well known and well regarded in the community since their construction in the 1950s and 1970s respectively.

c) An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the local area

The study area does not include items or areas important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in the



local area. Therefore, the study area is not considered to have significance under this criterion.

d) An item has strong or special association with a particular community or cultural group in the local area for social, cultural or spiritual reasons

The study area is not considered to hold strong or special associations with particular communities or cultural groups in the local area.

As such, the study area is considered to have limited significance under this criterion.

e) An item has potential to yield information that will contribute to an understanding of the local area's cultural or natural history

Review of relevant literary resources has not indicated that the study area may have potential to yield information that will contribute to an understanding of the local area's cultural or natural history. The site is not considered likely to have archaeological potential and therefore the study area is not considered to have significance under this criterion.

f) An item possesses uncommon, rare or endangered aspects of the local area's cultural or natural history

The study area is not considered to have significance under this criterion.

g) An item is important in demonstrating the principal characteristics of a class of the local area's

- Cultural or natural places; or
- Cultural or natural environments

The study area does not exhibit principal characteristics of a class of the local area's cultural or natural places or environments.

4.4 STATEMENT OF SIGNIFICANCE

The historical research undertaken for this assessment in conjunction with a site inspection did not identify any significant heritage elements within the study areas that should be conserved.

Overall, the proposed additional Grain Storage and Handling Facilities and the Rail Maintenance Building within the study areas are not considered to possess heritage significance.



5.0 STATEMENT OF HERITAGE IMPACT

The proposed works for development within the study area has the potential to impact on the heritage values within or adjacent to the lot. A Statement of Heritage Impact assists in the decision-making process when assessing the impact a development proposal may have on the heritage significance of heritage items.

5.1 PROPOSED DEVELOPMENT

A number of additions are proposed for the area to upgrade Grain Storage and Handling Facilities. Overall, it is understood that the modification would enable the following:

- The additional grain storage capacity will provide a raw material storage buffer which will reduce the risk from disruptions to supply following transport difficulties, floods (as has occurred recently), droughts and maintenance.
- Shoalhaven Starches will be able to separate different grades of wheat. This will enable different grades of wheat to be stored separately allowing a more consistent raw material feed to the Shoalhaven Starches factory operations increasing plant efficiencies throughout.
- Wheat will be able to be delivered to the site safely and efficiently via either road or rail.
- Regular maintenance and cleaning of the wheat storage system will be able to be carried without impeding production processes.
- Shoalhaven Starches will be able to undertake more efficient cleaning of the wheat storage reducing wastage.

The physical works will involve the following:

Additional grain storage and handling facilities:

- The installation of three (3) wheat silos to the west of the former Dairy Farmers factory building.
- Construction of a train unloading facility to the south of the former Dairy Farmers factory building.
- The installation of a container inverter to be sited to the west of the propped silos.
- The installation of a grain conveyor and services gantry that will connect the proposed grain storage and handling facilities along the Shoalhaven River frontage of the site to the Shoalhaven Starches factory site.
- The construction of the conveyor will in part require the extension of the rock revetment wall along the Shoalhaven River embankment.
- The installation of a weighbridge to the north of the former Dairy Farmers factory building.



- The construction of an electricity substation control room, workshop and office building to the north of the former Dairy Farmers factory building.
- The above works will necessitate the demolition of the eastern part of the former Dairy Farmers factory building (as required).
- The relocation of the existing car park located between the Bolong Road frontage and the former Dairy farmers factory building.

WTP Upgrade

- Construction of one in-ground treated effluent storage pond with a capacity of 150 ML.
- Convert the existing Wet Weather Storage Ponds No. 1, 2 and 3 into another Anaerobic Digester with a volume of 80 ML.
- It is proposed to install an above ground enclosed steel 400 KL Equalisation Tank to the east of the existing SO Basin.
- Construction of a building for biogas collection fans from the new Pond 3 digester immediately to the south of the converted Anaerobic Digester.
- Installation of Biogas scrubber units.
- Interconnecting pipework, pumps and blowers.
- A new wastewater collection tank (70 KI) at the factory and new pipe to the WWTP.
- Substation and maintenance shed.
- Additional MBR and RO plant and associated building.

Relocation of approved finished product silos:

- Relocate and construct up to 15 finished product silos (starch & gluten) on the main factory site instead of in conjunction with the Northern Packing Plant site.

Rail maintenance building

- Construct a rail maintenance building, with associated internal vehicle access, at the eastern terminus of the recently approved Mod 25 rail line extension to the east of the former Paper Mill factory site.
- It is also proposed to install provision for rail fuel storage adjacent to the existing rail line within the former Paper Mill site.

Ethanol maintenance building

- Construct an Ethanol Maintenance building within the south-eastern part of the main factory site.

Nitric acid storage

- Construction of a Nitric Acid storage adjacent to existing cooling towers to the west of Abernethys Creek.
- The works associated with the above proposal are likely to impact the ground surface and have been assessed as a part of this study.

5.2 POTENTIAL IMPACT

The proposed development works would not physically impact on any of the adjacent heritage items, as the closest item is approximately 500m north west of the



proposed additional Grain Storage and Handling Facilities and 500m east of the proposed upgrades to the WWTP.

The proposed development is considered unlikely to impact on the significance of any of these heritage items.

Further, the site is considered unlikely to contain archaeological potential, due to the lack of previous development in the area, and the location of the study area on a floodplain which has seen significant flood events occurring since settlement of the area.

5.3 IMPACT ASSESSMENT

Overall, the proposed works are considered unlikely to impact on the heritage significance of any items in the vicinity of the proposed works. No items of heritage significance are located within the study area and therefore no impact to heritage significance within the study area would occur.



6.0 CONCLUSIONS AND RECOMMENDATIONS

6.1 CONCLUSIONS

- The study area is not listed as an item of historical heritage.
- One heritage item of local significance is located approximately 500m to the north west of the study area, comprising the Bomaderry Railway Station and yard group, along with the former Bomaderry Milk Factory, which is located approximately 500m west of the study area.
- Two additional heritage items are located approximately 900m to the east and north east of the rail line extension study area and 500m east of the waste water treatment plant, comprising the Berry Estate vertical timber slab cottage and outbuildings, and “Beuna Vista” – dairy farm complex including Berry Estate vertical timber slab barn.
- No newly identified items of historical heritage were noted within the study area.
- It is proposed to build additional Grain Storage and Handling Facilities, a Rail Maintenance Building, and upgrade existing waste water treatment facilities within the existing site.
- The proposed development would not impact on any of the listed heritage sites in the wider vicinity.
- The study area is not considered to have archaeological potential.
- Overall, it is not considered that the proposed works would have any impact on the heritage significance of the listed sites in the wider vicinity of the study area.

6.2 RECOMMENDATIONS

The proposed works are not considered likely to impact on the heritage values of any items within or adjacent to the study areas. No further archaeological or heritage assessment is required for the project.

Should unanticipated archaeological material be encountered during site works, all work must cease and an archaeologist contacted to make an assessment of the find. Further archaeological assessment may be required prior to the recommencement of works. Any historical objects must be reported to Heritage NSW.



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