



# St John of God, Richmond State Significant Development - Mental Health Facility: Cultural Heritage Management Plan

Prepared for Johnstaff on behalf of St John of God Health Care Incorporated

19 July 2022

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- Johnstaff: Damian Gibson.

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- Jenny Beckius (mapping).
- Joshua Madden (technical advice).
- Registered Aboriginal Parties.

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## Glossary

<b>ACHA</b>	Aboriginal Cultural Heritage Assessment
<b>AHIMS</b>	Aboriginal Heritage Information Management System
<b>ASIRF</b>	Aboriginal Site Impact Recording Form
<b>CHMP</b>	Cultural Heritage Management Plan
<b>CMP</b>	Conservation Management Plan
<b>CoC</b>	Conditions of Consent
<b>DP</b>	Deposited Plan
<b>DPI</b>	Department of Primary Industries
<b>DPIE</b>	Department of Planning, Industry and Environment
<b>EP&amp;A Act</b>	<i>Environmental Planning and Assessment Act 1979</i>
<b>HAA</b>	Historic Archaeological Assessment
<b>Heritage NSW</b>	Heritage NSW, Department of Planning and Environment
<b>ICOMOS</b>	International Council on Monuments and Sites
<b>LEP</b>	Local Environmental Plan
<b>NPW Act</b>	<i>National Parks and Wildlife Act 1974</i>
<b>PPE</b>	Personal Protective Equipment
<b>RAP</b>	Registered Aboriginal Party
<b>SSD</b>	State Significant Development
<b>Study area</b>	Defined as 235 Grose Vale Road, North Richmond, New South Wales (Lot 11 DP 1134453)
<b>The Code</b>	<i>The Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i>
<b>WHS</b>	Work Health and Safety

# 1 Introduction

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This Cultural Heritage Management Plan (CHMP) manages the impacts to Aboriginal and non-Aboriginal heritage during works associated with the St John of God Richmond Mental Health Facility development located at 235 Grose Vale Road, North Richmond, New South Wales (NSW) (Lot 11 DP 1134453) (the study area). It should be noted this CHMP does not cover management of built heritage as assessed by Weir Phillips and Planning (2020). Information on the management of built heritage will be covered in the Conservation Management Plan (CMP).

On 24 March 2022, the Minister for Planning issued Development Consent (SSD-10394) under Section 4.38 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). This CHMP forms part of the Construction Environmental Management Plan (CEMP), as required under Condition C12 of the Conditions of Consent (CoC). The CHMP should be read in conjunction with the CEMP.

The CHMP has been prepared in accordance with the EP&A Act and the *National Parks and Wildlife Act 1974* (NPW Act).

## 1.1 Project background

Biosis was commissioned by Johnstaff on behalf of St John of God Health Care Incorporated (Inc), to undertake an Aboriginal Cultural Heritage Assessment (ACHA) for the proposed SSD at 235 Grose Vale Road, North Richmond NSW (Biosis, 2020a). The assessment supported an application to DPIE for an SSD approval (SSD 10394), and was included within the Specialist Consultant Studies Compendium that accompanied the EIS. Biosis also completed an Historical Archaeological Assessment (HAA) for the project (Biosis, 2021).

The proposed development consists of the redevelopment of St John of God Hospital, which will include earthworks and the construction of a new building complex.

This CHMP has been prepared for St John of God Health Care Inc. to address the management of Aboriginal and non-Aboriginal heritage located within the 235 Grose Vale Road, North Richmond development area. This CHMP also addresses the procedures to be followed in the event any Aboriginal or non-Aboriginal heritage items are uncovered during construction works, in addition to the location of all buffer areas and no-go zones.

The Aboriginal community has been consulted regarding the heritage management of the project throughout its lifespan, and will be consulted regarding the heritage management provisions set out in this CHMP. Consultation has been undertaken as per the process outlined in the *Aboriginal cultural heritage consultation requirements for proponents 2010* (DECCW, 2010a) (consultation requirements). Following the closure of consultation for the draft CHMP, the Aboriginal community and stakeholders endorsed the document. Full details of consultation can be found in Appendix D.

### 1.1.1 Biosis Aboriginal Cultural Heritage Assessment (2020)

Biosis completed an ACHA for the St John of God Richmond Mental Health Facility development area for Johnstaff, in order to identify any Aboriginal sites or areas of archaeological potential present within the study area. A search of the Aboriginal Heritage Information Management System (AHIMS) database did not identify any previously registered AHIMS sites within the study area. Consultation with Johnstaff and the Aboriginal community identified that the Richmond Hill Memorial Gardens is present within the study area. This memorial garden contained high historic, aesthetic and cultural values due to its strong association with the Battle of Richmond Hill and its ties to early colonisation efforts along the Hawkesbury River. In addition to this,

five areas of moderate archaeological potential and one area of high archaeological potential were identified throughout the high points and terraces of the landform, within close proximity to the Hawkesbury River. Johnstaff was able to amend the development footprint for the study area, to contain all proposed development works within existing areas of disturbance and construction, therefore not impacting any areas of Aboriginal archaeological potential. An exclusion zone was also established surrounding the memorial gardens.

### **1.1.2 Biosis Historical Archaeological Assessment (2021)**

Biosis completed a HAA for the St John of God Richmond Mental Health Facility development area for Johnstaff, in order to identify any historical values or areas of archaeological potential present within the study area. A search of the local, state and national heritage databases identified one heritage listed item of local significance within the study area, *"St John of God Hospital (former Belmont Park, mansion, garden, building, gatehouse and curtilage (Hawkesbury Local Environmental Plan (LEP) 2012, Item No. 1412)"*. The assessment also identified two areas of moderate archaeological potential pertaining to the location of the original Belmont homestead containing Bell House, an office, and outbuildings, dating to c.1810 and the stables and coach house, also dating to c.1810. The assessment suggested that the Bell homestead was located on the slope below the crest of Richmond Hill, below and north of the current Belmont House and gardens. This area also contained several items identified in 20th century photographs which were likely to be associated with the Bell homestead buildings and activities. The HAA recommended that the works could proceed with caution in areas of low and nil archaeological potential. Areas of moderate archaeological potential were recommended for avoidance and soft buffer zones must be established to ensure works do not impact on areas of historical significance.

## **1.2 Development Overview**

The St John of God Richmond Mental Health Facility, is a regional medical facility located at North Richmond within the Hawkesbury local government area (LGA) (see Figure 1).

St John of God Health Care Inc. identified as 'the Proponent', obtained Development Consent (SSD 10394) on 24 March 2022 from the Department of Planning, Industry and Environment (DPIE) for the *'St John of God Richmond Mental Health Facility'* comprising of the construction of six new buildings, the demolition of eight existing buildings, the removal of car spaces, the refurbishment of Belmont House, the administration building and the Xavier building, earthworks, tree removal and landscaping.

Specifically, SSD 10394 permits the following development:

- *The construction of four new two-storey Residential Pavilions, a new one to two storey Garden Pavilion and a single storey Wellness Centre.*
- *The demolition of eight existing buildings.*
- *The removal of 17 car spaces.*
- *The refurbishment of Belmont House, Administration Building and Xavier Building.*
- *Earthworks (inclusive of bulk earthworks, site levelling, import and compaction of fill material and excavation for installation of drainage and services).*
- *Tree removal and landscaping.*



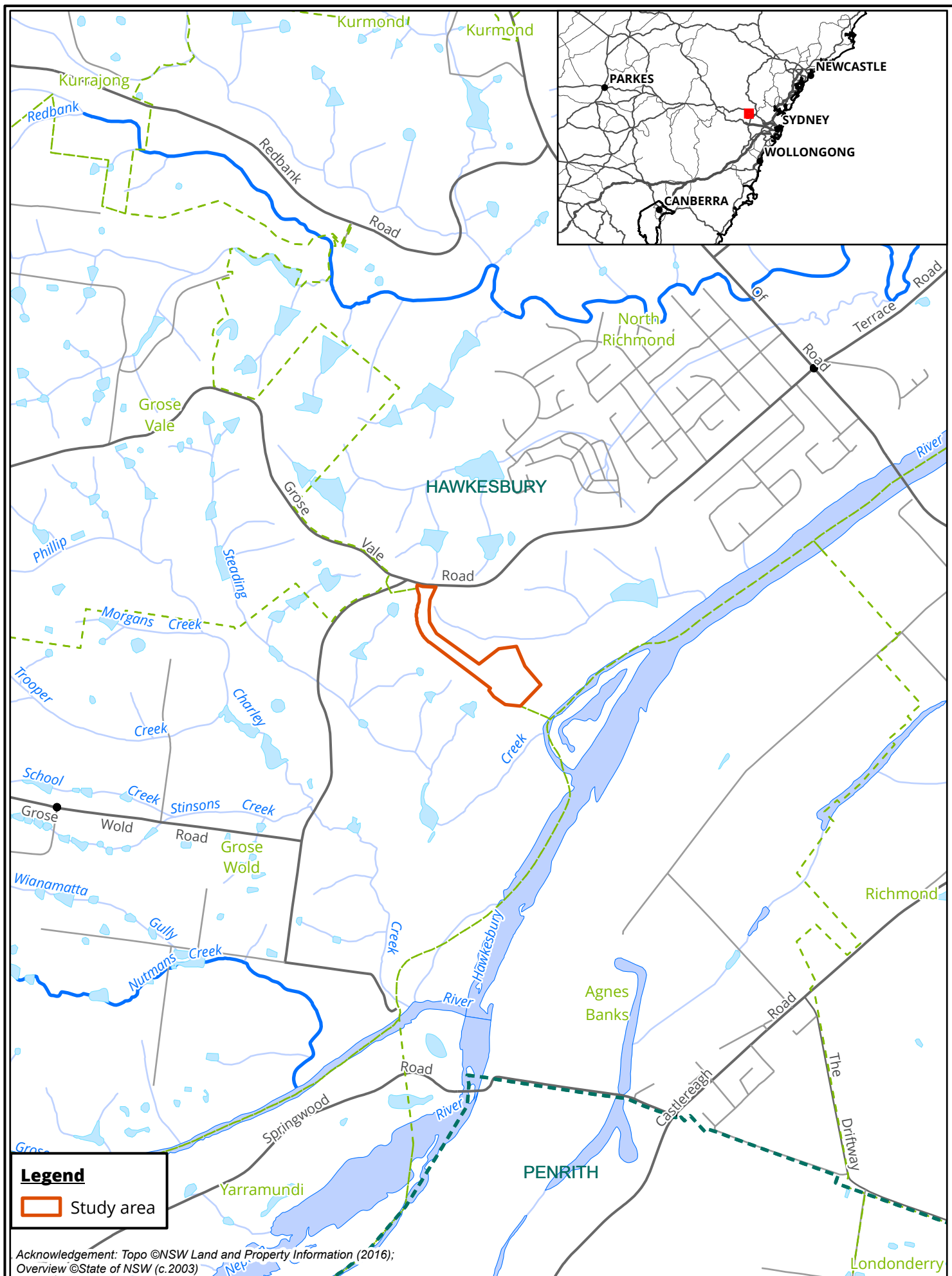
### 1.3 Location

The study area is located at 235 Grose Vale Road, North Richmond and is legally described as Lot 11 DP 1134453. It is located approximately 600 metres west of the suburb of North Richmond and approximately 17 kilometres north of the Penrith CBD. It encompasses 47 hectares of private land and is currently zoned RU1 Primary Production.

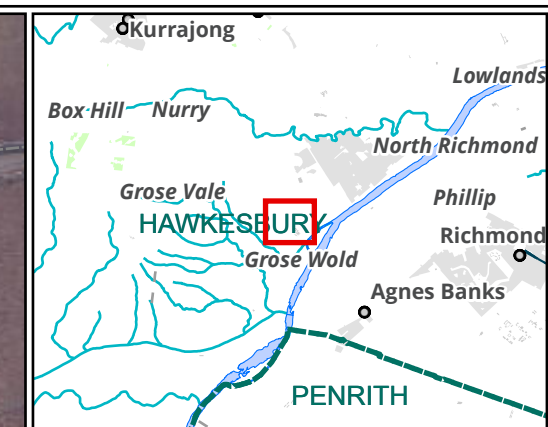
The site is bound by the following land uses:

- North – Grose Vale Road.
- South – Hawkesbury River.
- East – Lot 2 DP 880641.
- West – Lots 6 and 14 DP 703300.

The site has historically been used for low intensity farming and residential housing, with its primary use today being a mental health facility. The study area primarily contains built medical and residential structures, with grass and limited stands of vegetation located throughout areas containing minimal disturbances.



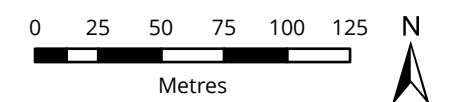




### Legend

- Study area
- Lot

**Figure 2 Study area detail**

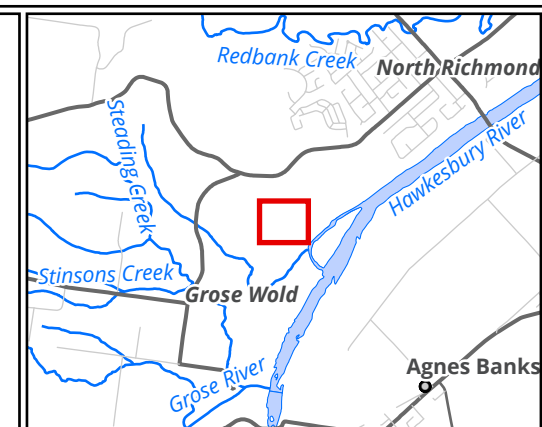
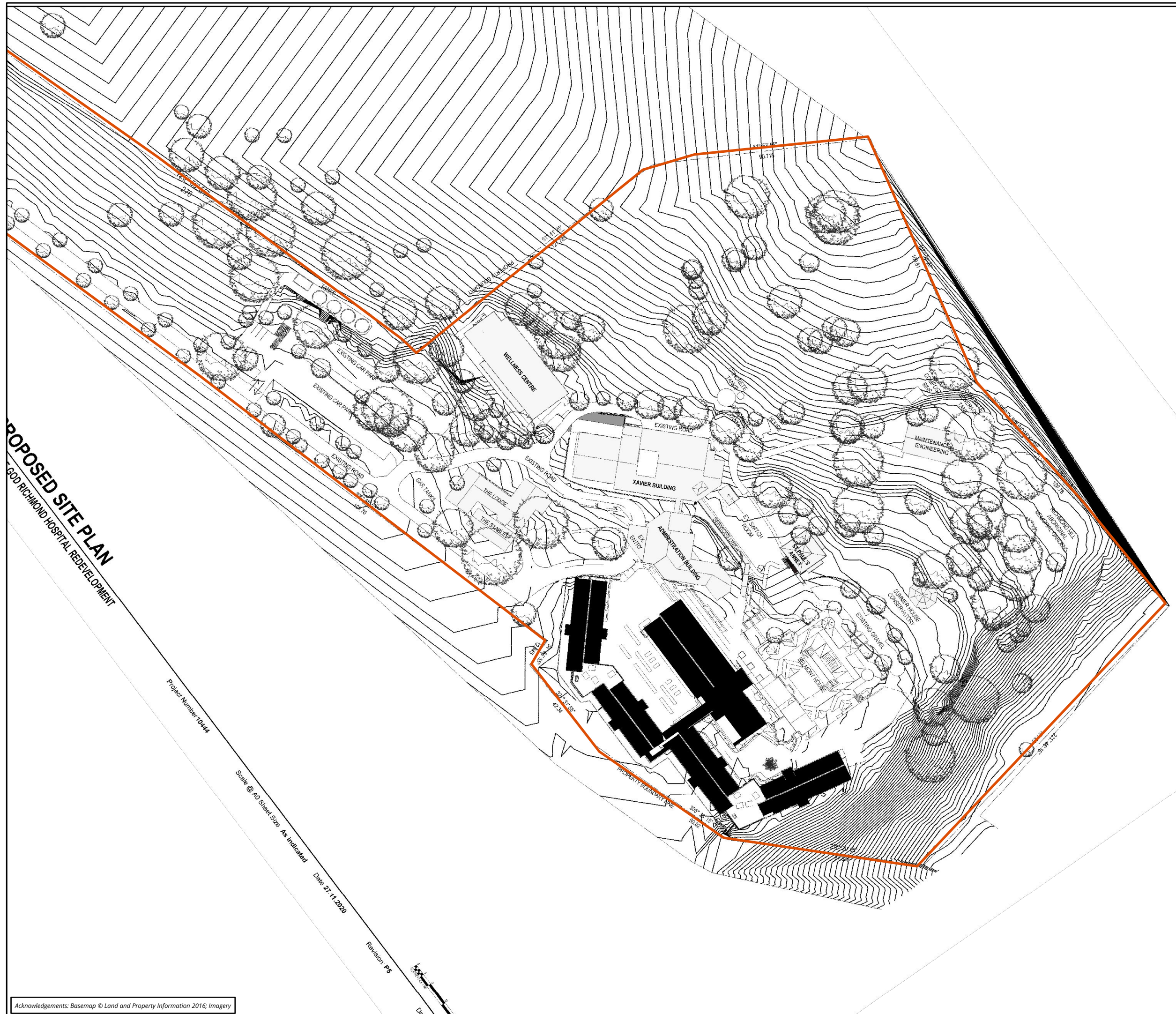


Metres  
Scale: 1:3,000@ A3  
Coordinate System:  
GDA 1994 MGA Zone 56



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# Legend

Study area

Figure 3 Proposed works



Metres  
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GDA 1994 MGA Zone 56



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## 1.4 Purpose and objectives

The purpose of this CHMP is to describe how Aboriginal and non-Aboriginal heritage will be protected and managed by St John of God Health Care Inc, during the operational life of the project. In accordance with C12 of the CoC, the CHMP forms part of the project's CEMP and should be read in conjunction with that document.

The key objective of the CHMP is to ensure that impacts to Aboriginal and non-Aboriginal heritage are minimised and within the scope permitted by the Development Approval. CoC applicable to the project and this CHMP can be found in Table 1. Specific objectives include:

- Updated baseline mapping of the Aboriginal and non-Aboriginal heritage items within and adjoining the operational study area.
- A description of the measures that would be implemented for:
  - Managing the discovery of human remains or previously unidentified heritage items.
  - Conducting further archaeological and heritage assessment in any disturbance areas where this assessment has not already been carried out.
  - Ensuring any workers on site receive suitable heritage inductions prior to carrying out any work on site.

The CHMP must include a description of the measures for the management of Aboriginal and non-Aboriginal heritage that would be implemented to:

- Protect the heritage items outside the project disturbance area.
- Minimise and manage the impacts of the project on heritage items within the disturbance area, including a strategy for the long-term management of any items or material that are collected during any of these archaeological works.
- Monitor and report on the effectiveness of any mitigation measures and any heritage impacts of the project.
- Maintain and manage reasonable access for registered Aboriginal parties (RAPs) to heritage items on site.
- Provide for ongoing consultation with RAPs in the conservation and management of Aboriginal cultural heritage on site.
- Monitor and report on the effectiveness of these measures and any heritage impacts of the project.
- Include a description of the measures that would be implemented for the management of unexpected Aboriginal and non-Aboriginal heritage finds.

This CHMP should be read in conjunction with the following documents:

- *St John of God Richmond Mental Health Facility Aboriginal Cultural Heritage Assessment* (Biosis, 2020a). *Report for Johnstaff on behalf of St John of God.*
- *St John of God Richmond Mental Health Facility Archaeological Report* (Biosis, 2020b). *Report for Johnstaff on behalf of St John of God.*

- *Heritage Impact Statement, St. John of God Hospital, 177 Grose Vale Road, Richmond, prepared by Weir Phillips Heritage & Planning. Report for Johnstaff (Weir Phillips Heritage and Planning, 2020).*
- *St John of God Historical Archaeological Assessment (Biosis, 2021). Report for Johnstaff.*

Please note that this CHMP does not cover management of built heritage as assessed by Weir Phillips and Planning (2020) and information on the management of built heritage will be covered in the CMP.

## 1.5 Heritage Management Conditions

The conditions relating to Aboriginal and non-Aboriginal heritage and where they have been addressed within this document are described below in Table 1.

**Table 1 Conditions of Consent – Aboriginal and non-Aboriginal Heritage**

Condition	Description	Location within CHMP
<b>C18</b>	Before the commencement of construction works, an Aboriginal Cultural Heritage Management Sub-Plan (ACHMSP) must address, but not be limited to, the following:	This document
<b>C18 (a)</b>	Be prepared by a suitably qualified and experienced expert in consultation with the Registered Aboriginal Parties.	Section 5.1.9, Appendix C and Appendix D
<b>C18 (b)</b>	Be submitted to the satisfaction of the Planning Secretary prior to construction of any part of the development.	-
<b>C18 (c)</b>	Describe the measures to protect the Richmond Hill Memorial Garden in perpetuity.	Section 5.1.5, Section 5.1.7 and Section 5.1.8
<b>C18 (d)</b>	Minimise and avoid potential harm to the Richmond Hill Memorial Garden and areas of Aboriginal archaeological sensitivity adjacent to the construction footprint.	Section 5.1.5, Section 5.1.7 and Section 5.1.8
<b>C18 (e)</b>	An Aboriginal cultural heritage awareness induction which must be completed by all contractors and staff involved.	Appendix A, Section 5.1.1, Section 5.1.3 and Section 7
<b>C23</b>	Prior to the commencement of construction, the Applicant must consult with Registered Aboriginal Parties to determine specific requirements and management measures to be used on site during construction, including protection of any objects or items in perpetuity.	Previous ACHA (Biosis 2020), this document, Section 5.1.7, Section 5.1.8 and Section 5.1.9.
<b>D26</b>	In the event that surface disturbance identifies a new Aboriginal object, all works must halt in the immediate area to prevent any further impacts to the object(s). A suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects. The site is to be registered in the AHIMS which is managed by EES Group and the management outcome for the site included in the information provided to AHIMS. The Applicant must consult with the Aboriginal community representatives, the archaeologists and EES Group to develop and implement management strategies for all objects/sites. Works must only recommence with the written approval of EES Group.	Section 5.1.5, Section 5.1.10 and Appendix E

Condition	Description	Location within CHMP
<b>D27</b>	If any unexpected archaeological relics (including related to the Belmont Homestead) are uncovered during the work, then all works must cease immediately in that area and Heritage NSW contacted. Depending on the possible significance of the relics, an archaeological assessment and management strategy may be required before further works can continue in that area. Works may only recommence with the written approval of Heritage NSW (or delegate).	Section 5.1.6, Section 5.1.11 and Appendix E
<b>D40</b>	Upon completion of the Stage 2 construction works and prior to commencement of Stage 3 construction works, an inspection of the redevelopment works must be undertaken by Council's nominated Heritage staff member.	-
<b>D41</b>	Construction must be undertaken in accordance with the recommendations within the Historic Archaeology Assessment prepared by Biosis dated 10 December 2021, which requires:	-
<b>D41 (a)</b>	Works are to avoid the two areas of archaeological potential identified within the Historic Archaeology Assessment report prepared by Biosis dated 10 December 2021. To ensure no impacts occur within these designated areas, any disturbance to the subsurface deposits (including but not limited to excavation, trenching and demolition of buildings which could remove footings or foundations etc) should be avoided. If impacts cannot be avoided in these areas, then the following must be undertaken prior to works: <ul style="list-style-type: none"> <li>• Recommencement of construction if any works are to be undertaken within adjacent areas designated as low potential the implementation of a 5-10 metres fenced (hard barrier) buffer around the boundary of the identified areas of moderate potential is required to ensure no impacts to these areas occur.</li> </ul>	Section 5.1.6
<b>D41 (b)</b>	Site workers must undertake a heritage induction to ensure that they are aware of the heritage significance of items and potential archaeological resources within the study area, their statutory obligations under the <i>Heritage Act 1977</i> (Heritage Act) and the penalties for breaching the provisions of the Heritage Act. The heritage induction will also provide information to site workers on potential archaeological items that they may encounter during works, and the steps to take should they be encountered.	Appendix A, Section 5.1.1, Section 5.1.3 and Section 7

## 1.6 Contributors

This CHMP was prepared by Ashley Bridge, Project Archaeologist at Biosis Pty Ltd (Biosis). This report has been reviewed by Taryn Gooley, Manager – Heritage (NSW), at Biosis.

## 2 Environmental requirements

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The following section outlines the environmental requirements of the project including relevant legislation and guidelines that have been used to assist in the formulation of this CHMP.

### 2.1 Relevant legislation and guidelines

Legislation relevant to heritage management includes:

- *Environmental Planning and Assessment Act 1979* (EP&A Act).
- *National Parks and Wildlife Act 1974* (NPW Act).
- *Heritage Act 1977* (Heritage Act).

The main guidelines, specifications and policy documents relevant to this CHMP include:

- Australia ICOMOS (2013). *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance*, Australia ICOMOS, Burwood, VIC.
- DECCW (2010a). *Aboriginal Cultural Heritage Consultation Requirements for Proponents*, Department of Environment and Climate Change, Sydney NSW (consultation requirements).
- DECCW (2010b). *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*, Department of Environment and Climate Change, Sydney NSW (the Code).
- Heritage Office & Department of Planning (2009). *Historical Archaeology Code of Practice*.
- OEH (2011). *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*, Office of Environment and Heritage.

### 2.2 Commitment to Aboriginal cultural heritage preservation

Aboriginal people have inhabited the Australian continent for the last 50,000 years and the NSW area for over 42,000 years (Allen and O'Connell, 2003; Bowler *et al.*, 2003). These dates are subject to continued revision as further evidence of Aboriginal cultural heritage is discovered and as more research of this evidence is conducted.

Without being part of the Aboriginal culture, and the productions of this culture, it is not possible for non-Aboriginal people to fully understand their meaning to Aboriginal people – only to move closer towards understanding this meaning with the help of the Aboriginal community. Similarly, definitions of Aboriginal culture and cultural heritage without this involvement constitute outsider interpretations.

With this preface, Aboriginal cultural heritage broadly refers to things that relate to Aboriginal culture and hold cultural meaning and significance to Aboriginal people (DECCW, 2010a). There is an understanding in Aboriginal culture that everything is interconnected. In essence, Aboriginal cultural heritage can be viewed as potentially encompassing any part of the physical and/or mental landscape, that is, 'Country' (DECCW, 2010a).



Aboriginal people's interpretation of cultural value is based on their 'traditions, observance, lore, customs, beliefs and history' (DECCW, 2010a). The things associated with Aboriginal cultural heritage are continually and actively being defined by Aboriginal people (DECCW, 2010a). These things can be associated with traditional, historical or contemporary Aboriginal culture (DECCW, 2010a).

### **2.2.1 Tangible Aboriginal cultural heritage**

Three categories of tangible Aboriginal cultural heritage may be defined as:

- Things that have been observably modified by Aboriginal people.
- Things that may have been modified by Aboriginal people but no discernible traces of that activity remain.
- Things never physically modified by Aboriginal people (but associated with Dreamtime Ancestors who shaped those things).

### **2.2.2 Intangible Aboriginal cultural heritage**

Examples of intangible Aboriginal cultural heritage would include memories of stories and 'ways of doing', which would include language and ceremonies (DECCW, 2010a).

### **2.2.3 Statutory**

Currently Aboriginal cultural heritage, as statutorily defined by the NPW Act, consists of objects and places.

Aboriginal objects are defined as:

*'any deposit, object or material evidence...relating to the Aboriginal habitation of the area that comprises NSW, being habitation before or concurrent with (or both) the occupation of that area by persons of non-Aboriginal extraction, and includes Aboriginal remains.'*

Aboriginal places are defined as a place that is or was of special Aboriginal cultural significance. Places are declared under Section 84 of the NPW Act.

### **2.2.4 Values**

Aboriginal cultural heritage is broadly valued by Aboriginal people as it is used to define their identity as both individuals and as part of a group (DECCW, 2010a). More specifically it is used:

- To provide a:
  - 'Connection and sense of belonging to Country' (DECCW, 2010a).
  - Link between the present and the past (DECCW, 2010a).
- As a learning tool to teach Aboriginal culture to younger Aboriginal generations and the general public (DECCW, 2010a).
- As further evidence of Aboriginal occupation prior to European settlement for people who do not understand the magnitude to which Aboriginal people occupied the continent (see also (DECCW, 2010a)).

The NSW government and all of its entities are committed to the protection and preservation of Aboriginal and non-Aboriginal cultural heritage in NSW and on the Mamre South Precinct development site.

## 3 Existing environment

The following sections summarise what is known about Aboriginal and non-Aboriginal heritage within and adjacent to the study area based on information provided in:

- *St John of God Richmond Mental Health Facility Aboriginal Cultural Heritage Assessment* (Biosis, 2020a). *Report for Johnstaff on behalf of St John of God.*
- *St John of God Richmond Mental Health Facility Archaeological Report* (Biosis, 2020b). *Report for Johnstaff on behalf of St John of God.*
- *Heritage Impact Statement, St. John of God Hospital, 177 Grose Vale Road, Richmond, prepared by Weir Phillips Heritage & Planning. Report for Johnstaff* (Weir Phillips Heritage and Planning, 2020).
- *St John of God Historical Archaeological Assessment* (Biosis, 2021). *Report for Johnstaff.*

### 3.1 Aboriginal cultural heritage

Aboriginal cultural heritage values were subject to assessment through the following processes:

- Literature and database review.
- Archaeological survey.
- Aboriginal community consultation.
- Assessment of significance and proposed impacts.

Based upon these tasks, one Aboriginal heritage site (the Richmond Hill Memorial Gardens) associated with the project has been identified, along with five areas of moderate archaeological potential and one area of high archaeological potential. The Richmond Hill Memorial Gardens is located in the north-eastern portion of the study area and has been identified as an exclusion/no go zone to ensure no direct impacts occur within the area of high cultural significance.

Aboriginal heritage sites are detailed in Table 2 and their locations are identified in Figure 4.

**Table 2 Aboriginal heritage sites associated with the project**

PAD No./Name	Distance from development area	Level of archaeological potential/significance
1	430 metres north-west	Moderate
2	87 metres north-west	Moderate
3	Directly adjacent to northern boundary	Moderate
4	67 metres east	Moderate
5	Directly adjacent to eastern boundary	Moderate
6	Directly adjacent to western boundary	High
<b>Richmond Hill Memorial Garden</b>	70 metres north-east	High

## 3.2 Non-Aboriginal heritage

The assessment of non-Aboriginal heritage values within the study area was undertaken through the completion of the following tasks:

- Literature and database review by a registered historian.
- Archaeological survey.
- Assessment of significance and proposed impacts.

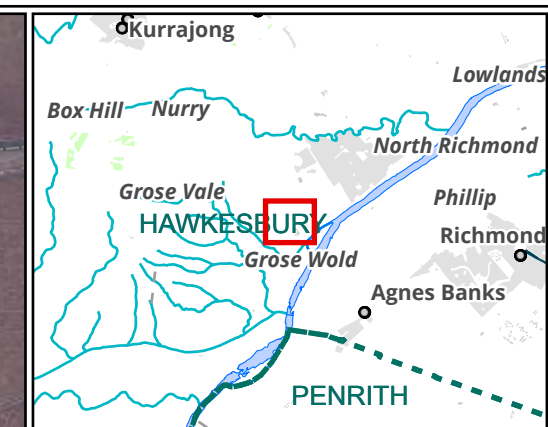
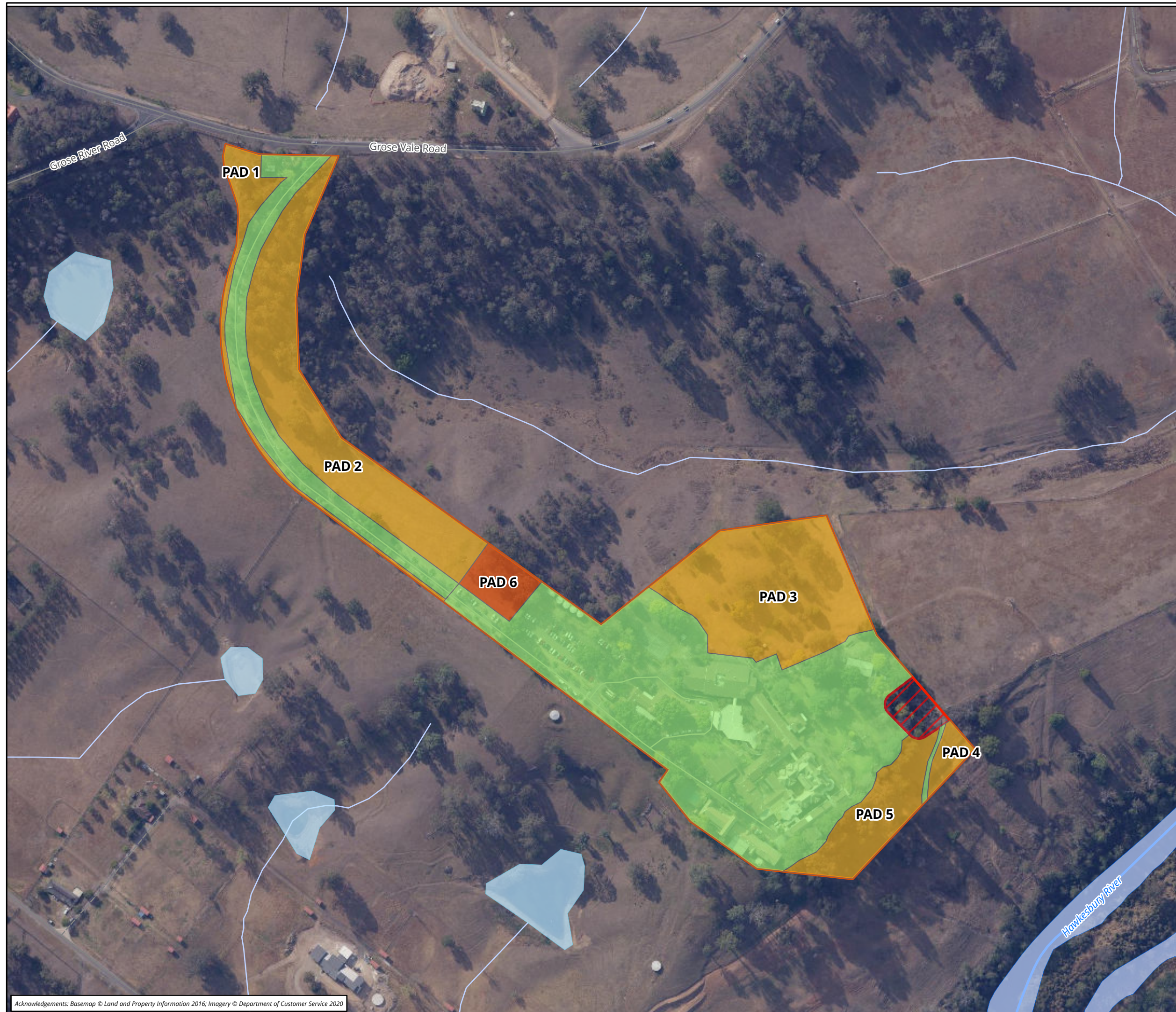
Based upon these tasks, one locally listed heritage item and two areas of moderate archaeological potential associated with the project have been identified. It should be noted that the locally listed item (*St John of God Hospital (former Belmont Park, mansion, garden, building, gatehouse and curtilage), Item no. 1412*), was assessed as part of the built heritage assessment and therefore will not be included in this document. Details on the management of this item can be found in the CMP.

Non-Aboriginal heritage sites are detailed in Table 3 and their locations are identified in Figure 5.

**Table 3 Non-Aboriginal heritage sites associated with the project**

Item No.	Site Name	Address/Property description	Listing	Significance	Impacts
N/A	Moderate archaeological potential for the original Belmont homestead containing Bell House, an office, and outbuildings.	235 Grose Vale Road, North Richmond. North of the current development area.	N/A	Local	No impacts allowed. Avoidance of site.
N/A	Moderate archaeological potential for the stables and coach house.	235 Grose Vale Road, North Richmond. West of the current development area.	N/A	Local	No impacts allowed. Avoidance of site.





**Legend**


 Study area

**Archaeological potential**

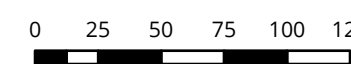
 High

 Moderate

 Low

 No-Go zone

**Figure 4 Location of  
Aboriginal heritage sites and  
no-go areas**



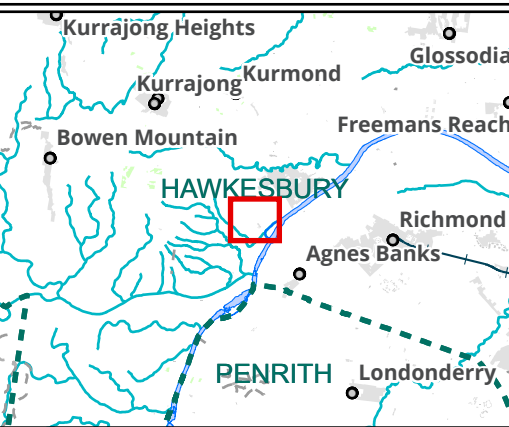
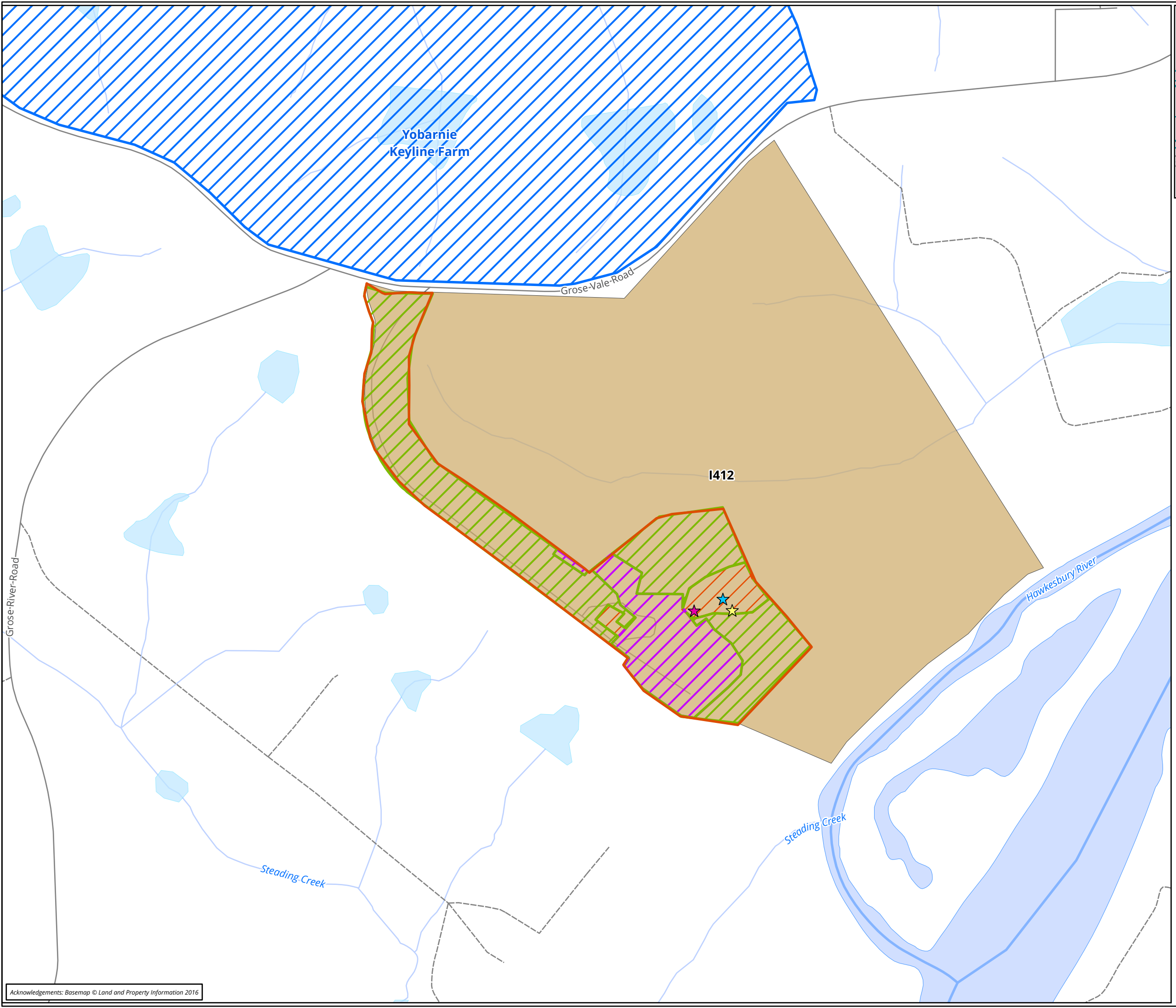
Metres

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Coordinate System:  
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Drawn by: JB, Checked by: AB, Last edited by: jbeckius  
Location: P:\37000s\37010\Mapping\  
37010\_StJohn\_ACHMP\_Updates, Layout: 37010\_F4\_Potential





- Legend**
- Study area
  - Approximate location of circular feature
  - Approximate location of sandstone wall
  - Approximate location of sandstone wall in terrace
  - State heritage item
  - Local heritage item**
    - Item - General
  - Archaeological potential**
    - Moderate
    - Low
    - Nil archaeological potential - substantial development

**Figure 5 Location of non-Aboriginal heritage sites**

0 50 100 150 200 250 N

Metres

Scale: 1:5,000@ A3  
Coordinate System:  
GDA 1994 MGA Zone 56

**biosis**

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## 4 Environmental aspects and impacts

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The key construction activities and the associated potential impacts to heritage values (both Aboriginal and non-Aboriginal) were identified through a risk management approach. The consequence and likelihood of each activity's impact on the environment was assessed to prioritise its significance.

### 4.1 Aboriginal heritage impacts

The potential impacts on Aboriginal heritage recordings include:

- Direct impacts and disturbance to the entire site or the majority of a site containing Aboriginal objects due to the construction of the project, this can be complete or partial.
- Indirect impacts to Aboriginal objects or cultural values, such as from development related changes to the landscape or scenic context of a site or item.

Impacts to Aboriginal heritage sites as outlined in:

- *St John of God Richmond Mental Health Facility Aboriginal Cultural Heritage Assessment* (Biosis, 2020a). *Report for Johnstaff on behalf of St John of God.*
- *St John of God Richmond Mental Health Facility Archaeological Report* (Biosis, 2020b). *Report for Johnstaff on behalf of St John of God.*

### 4.2 Non-Aboriginal heritage impacts

The potential impacts on non-Aboriginal heritage recordings include:

- Direct impacts and disturbance to the entire site or the majority of a site containing non-Aboriginal items due to the construction of the project, this can be complete or partial.
- Indirect impacts to non-Aboriginal items or historic values, such as from development related changes to the landscape or scenic context of a site or item.

Impacts to non-Aboriginal heritage sites as outlined in:

- *Heritage Impact Statement, St. John of God Hospital, 177 Grose Vale Road, Richmond, prepared by Weir Phillips Heritage & Planning. Report for Johnstaff* (Weir Phillips Heritage and Planning, 2020).
- *St John of God Historical Archaeological Assessment* (Biosis, 2021). *Report for Johnstaff.*

### 4.3 Impacts assessed and permitted under the Conditions of Consent

Based on the final schematic designs for the development area, no direct impacts are due to occur to Aboriginal and non-Aboriginal heritage sites. There is the potential for indirect visual impacts to occur to both Aboriginal and non-Aboriginal sites, however these are temporary. No direct impacts are permitted under the Conditions of Consent. Impacts to Aboriginal heritage sites are summarised in Table 4 and Table 5.

**Table 4 Impacts to Aboriginal heritage sites**

PAD No./Name	Significance	Type of harm	Degree of harm	Consequence of harm	Mitigation measures
<b>1</b>	Archaeological deposit - Moderate	No impact	None	No loss of value	Avoidance of site, heritage induction
<b>2</b>	Archaeological deposit - Moderate	No impact	None	No loss of value	Avoidance of site, heritage induction
<b>3</b>	Archaeological deposit - Moderate	Indirect visual - temporary	Partial - temporary	Temporary visual impacts, but no permanent loss of value	Avoidance of site, soft buffer delineation along boundary of site, hard buffer surrounding proposed development area, heritage induction
<b>4</b>	Archaeological deposit - Moderate	No impact	None	No loss of value	Avoidance of site, heritage induction
<b>5</b>	Archaeological deposit - Moderate	Indirect visual - temporary	Partial - temporary	Temporary visual impacts, but no permanent loss of value	Avoidance of site, soft buffer delineation along boundary of site, hard buffer surrounding proposed development area, heritage induction
<b>6</b>	Archaeological deposit - High	Indirect visual - temporary	Partial - temporary	Temporary visual impacts, but no permanent loss of value	Avoidance of site, soft buffer delineation along boundary of site, hard buffer surrounding proposed development area, heritage induction
<b>Richmond Hill Memorial Gardens</b>	Culturally significant memorial site - High	Indirect visual - temporary	Partial - temporary	Temporary visual impacts, but no permanent loss of value	Avoidance of site, no-go zone with hard buffer surrounding site (10 metres exclusion zone), heritage induction

**Table 5 Impacts to non-Aboriginal heritage sites**

Item No.	Site Name	Address/Property description	Listing	Significance	Degree of harm	Consequence of harm	Mitigation measures
N/A	Moderate archaeological potential for the original Belmont homestead containing Bell House, an office, and outbuildings.	235 Grose Vale Road, North Richmond. North of the current development area.	N/A	Local	None	No loss of value	Avoidance of site, soft buffer delineation along boundary of site, hard buffer surrounding proposed development area, heritage induction
N/A	Moderate archaeological potential for the stables and coach house.	235 Grose Vale Road, North Richmond. West of the current development area.	N/A	Local	None	No loss of value	Avoidance of site, soft buffer delineation along boundary of site, hard buffer surrounding proposed development area, heritage induction

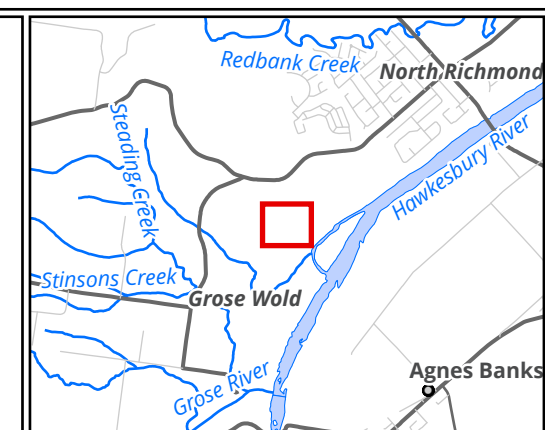
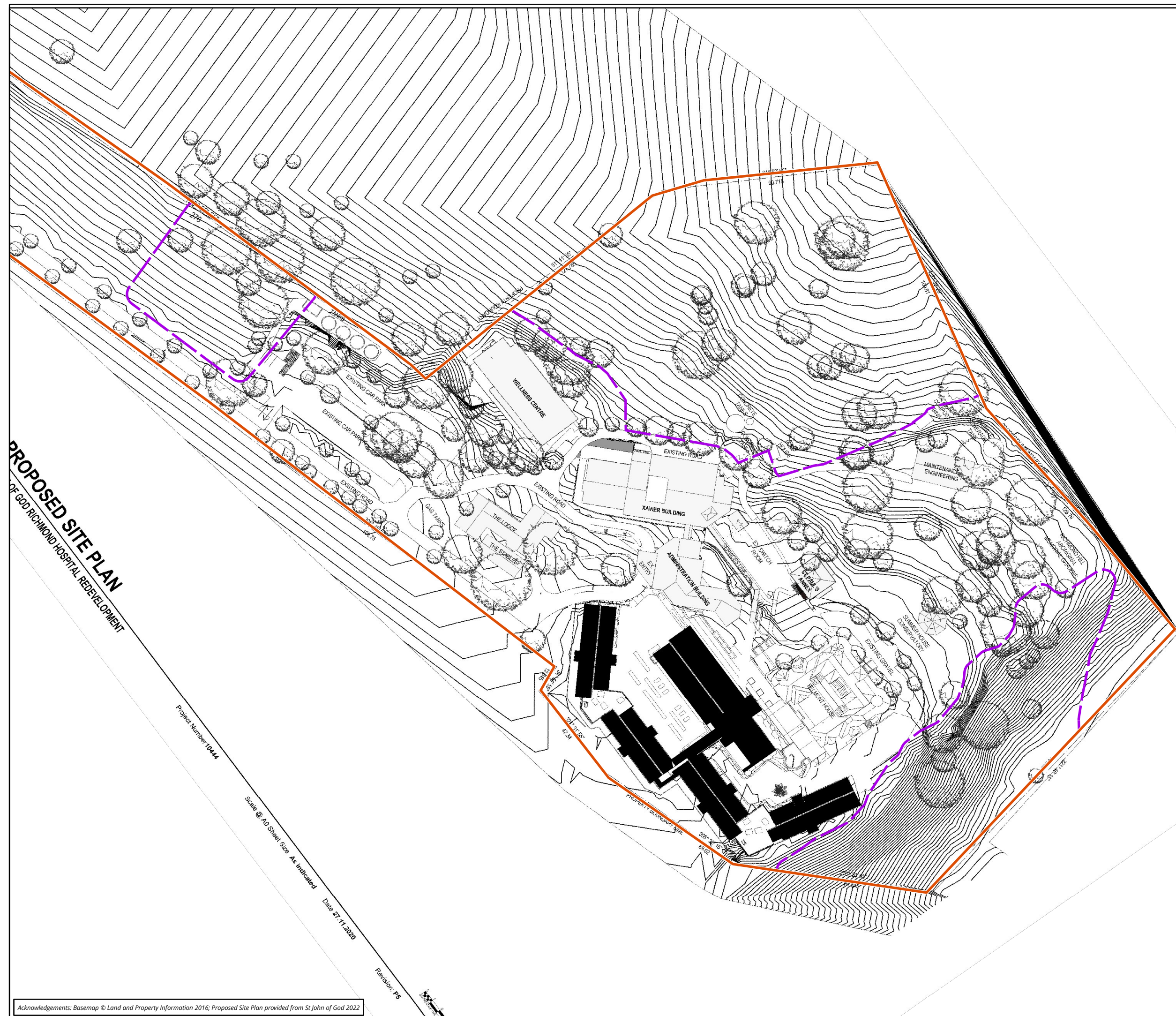
A 10 metre exclusion zone will be implemented surrounding the Richmond Hill Memorial Gardens to ensure that no impacts occur, with the memorial garden located outside of the proposed development area. Avoidance of impacts to archaeological and cultural heritage sites through the design of the development is the primary mitigation and management strategy, and should be implemented where practicable. The final schematic designs illustrate that all areas of ground disturbance and impacts will be contained to areas of low archaeological potential in order to adhere to the mitigation strategy detailed in the *St John of God Richmond Mental Health Facility Aboriginal Cultural Heritage Assessment* (Biosis, 2020a) and *St John of God Historical Archaeological Assessment* (Biosis, 2021). The proposed development will be contained within a hard buffer (fenced) boundary, with no works related to the proposed construction or demolition works to exist outside of this area. Where moderate or high areas of archaeological potential occur adjacent to the development boundaries, a soft buffer boundary delineation is required to indicate to construction workers where not to impact prior to construction works commencing (Table 4, Table 5 and Figure 6).

In the event that additional disturbance is anticipated to occur outside of the areas explicitly assessed in *St John of God Richmond Mental Health Facility Aboriginal Cultural Heritage Assessment* (Biosis, 2020a), *St John of God Richmond Mental Health Facility Archaeological Report* (Biosis, 2020b) and *St John of God Historical Archaeological Assessment* (Biosis, 2021), then these disturbances will need to undergo additional heritage assessment and impact mitigation processes prior to the commencement of any associated works. It is likely that any

additional impacts outside of the areas assessed in Biosis 2020 and 2021 would need to be assessed as a modification to the existing approval.

This CHMP does not cover management of built heritage as assessed by Weir Phillips and Planning (2020) and information on the management of built heritage will be covered in the CMP.

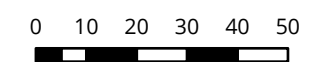




### Legend

- Study area
- Soft buffer boundary (5m buffer)

**Figure 6.1 Soft buffer boundaries of Aboriginal heritage sites**



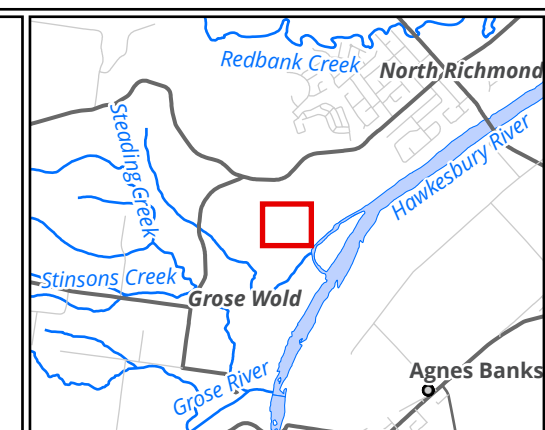
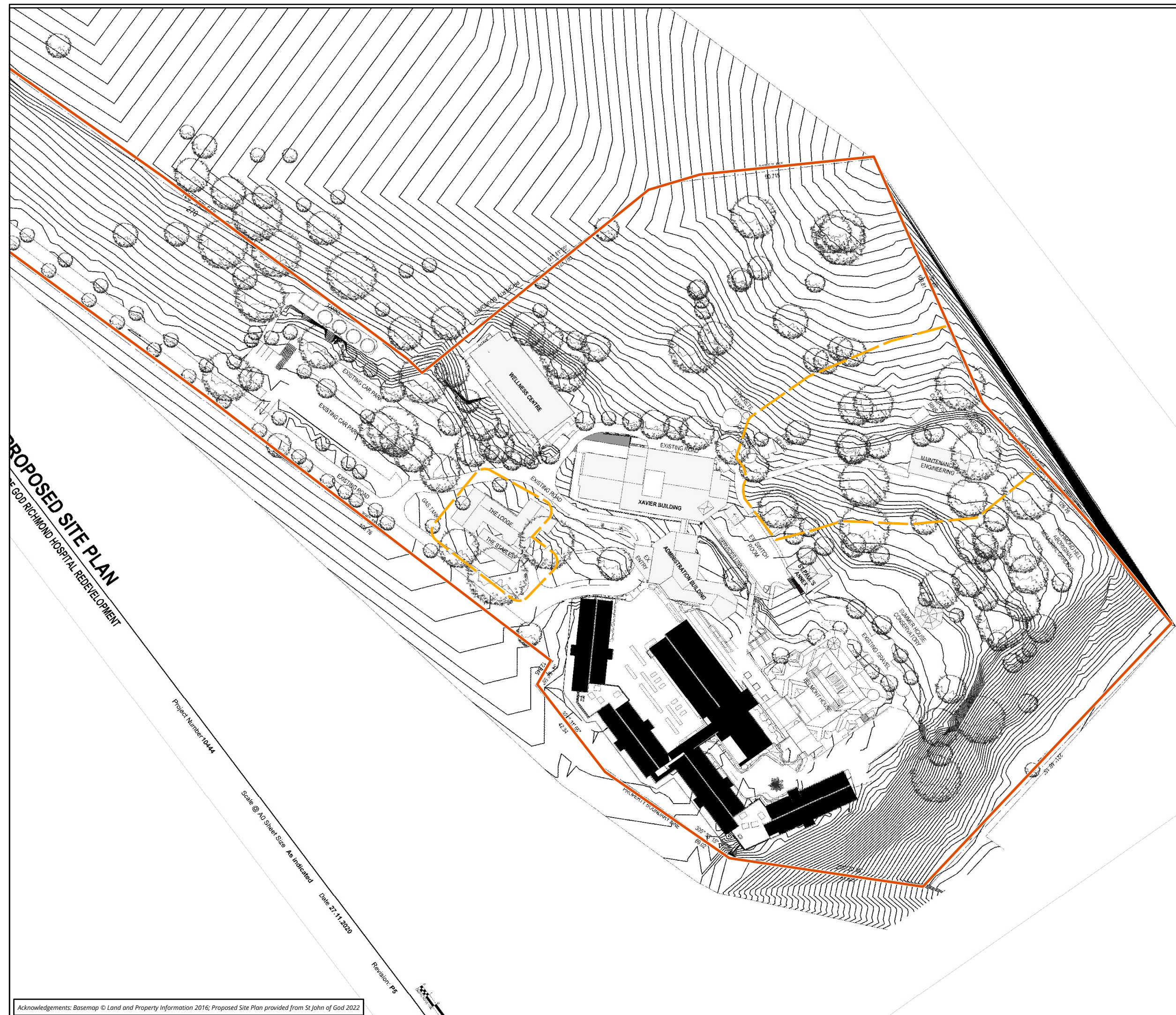
Metres

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Coordinate System:  
GDA 1994 MGA Zone 56



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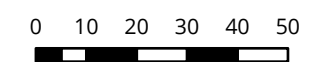




### Legend

- Study area
- Soft buffer boundary (5m buffer)

**Figure 6.2 Soft buffer boundaries of non-Aboriginal heritage sites**



Metres

Scale: 1:1,500@ A3  
Coordinate System:  
GDA 1994 MGA Zone 56



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## 5 Environmental mitigation measures

### 5.1 Operational related measures

Specific mitigation measures to address impacts on Aboriginal and non-Aboriginal heritage are outlined in Table 6. Where required, further details of the proposed mitigation measures are provided in Section 5.1.1 to 5.1.11.

**Table 6 Operational related measures**

Strategy	Requirement	Personnel
1	Contingency plan to follow in the event of the discovery of human remains.	Project Manager/ Construction contractor
2	Procedure to follow for conducting further archaeological and heritage assessments for any impacts not previously assessed and/or approved by the Conditions of Consent.	Project Manager/ Archaeologist/ Aboriginal Community
3	Heritage Induction for all employees, contractors and sub-contractors.	Project Manager/ Archaeologist
4	Contingency plan if Aboriginal or non-Aboriginal heritage items outside the approved disturbance area are damaged.	Project manager
5	Procedure to protect Aboriginal heritage sites within the study area not subject to harm.	Project Manager/ Archaeologist
6	Procedure to protect non-Aboriginal heritage items or locations within or adjacent to the study area not subject to harm.	Project Manager/ Archaeologist
7	Measures to protect the Richmond Hill Memorial Garden in perpetuity.	Project manager/ Aboriginal community
8	Maintaining and managing reasonable access for RAPs to visit the Richmond Hill Memorial Gardens or any identified Aboriginal heritage items located within the study area throughout the operational life of the project.	Project manager/ Aboriginal community
9	Ongoing consultation with RAPs regarding the management and conservation of Aboriginal cultural heritage throughout the operational life of the project	Project manager/ Archaeologist/ Aboriginal community
10	Contingency plan to follow in the event of unexpected Aboriginal finds.	Project Manager/ Construction contractor
11	Contingency plan to follow in the event of unexpected non-Aboriginal finds.	Project Manager/ Construction contractor

### 5.1.1 Strategy 1: Contingency plan to follow in the event of the discovery of human remains

This strategy has been formulated in accordance with Conditions C18 (e) and D41 (b).

If any suspected human remains are discovered within the study area, all activity must cease. The following contingency plan must be undertaken:

- Immediately cease all work at that location and not further move or disturb the remains.
- Notify NSW Police, and the NSW Environment Line on 131 555 as soon as practicable and provide details of the remains and their location.
- Establish an appropriate no-go area. This will need to be established in consultation with NSW Police, Heritage NSW and if necessary, a qualified archaeologist.
- Works will not be able to recommence within the location of the find until confirmation from NSW Police and Heritage NSW is obtained. If the remains are confirmed as not being human then works may recommence. In the event that remains are human then consultation with NSW Police, Heritage NSW and the RAPs to establish a plan of management must be undertaken.
- Works in the vicinity of the find will only be able to commence once the plan of management has been established and approval has been obtained from all relevant parties.
- Should any human remains be identified, this will trigger a review of this CHMP in accordance with Section 8.

### 5.1.2 Strategy 2: Procedure to follow for conducting further archaeological and heritage assessments for any impacts not previously assessed and/or approved by the Conditions of Consent.

For any new works or impacts outside those investigated in *St John of God Richmond Mental Health Facility Aboriginal Cultural Heritage Assessment* (Biosis, 2020a), *St John of God Richmond Mental Health Facility Archaeological Report* (Biosis, 2020b) and *St John of God Historical Archaeological Assessment* (Biosis, 2021) and approved under the Conditions of Consent, both an ACHA and HAA must be undertaken. This includes further archaeological assessment inclusive of testing for areas of moderate and high Aboriginal and non-Aboriginal archaeological potential identified in *St John of God Richmond Mental Health Facility Aboriginal Cultural Heritage Assessment* (Biosis, 2020a), *St John of God Richmond Mental Health Facility Archaeological Report* (Biosis, 2020b) and *St John of God Historical Archaeological Assessment* (Biosis, 2021), and shown in Figure 4 and Figure 5.

An ACHA must be prepared in accordance with the *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW* (OEH, 2011). This includes an Archaeological Report prepared in accordance with the Code and consultation with Aboriginal community in accordance with the consultation requirements.

A HAA must be prepared in accordance with current heritage guidelines including *Assessing Heritage Significance, Assessing Significance for Historical Archaeological Sites and 'Relics'* (NSW Heritage Branch, Department of Planning, 2009) and the *Burra Charter* (Australia ICOMOS, 2013).

### 5.1.3 Strategy 3: Heritage inductions for all employees, contractors and sub-contractors working in the study area

This strategy has been formulated in accordance with Conditions C18 (e) and D41 (b).

All employees, contractors, and sub-contractors must undertake a heritage induction as part of a site induction prior to commencement of any duties within the study area. Further details of a heritage induction package have been provided in Section 7 and Appendix A of this CHMP.

#### **5.1.4 Strategy 4: Contingency plan if Aboriginal or non-Aboriginal heritage items outside the approved disturbance area are damaged**

In the event that Aboriginal or non-Aboriginal heritage items outside of the approved disturbance area are damaged, St John of God Health Care Inc. must notify Heritage NSW immediately. Heritage NSW should be contacted through Environment Line on 131 555 as soon practical. An appropriate no-go zone should be established until the area can be inspected and advice sought from Heritage NSW on how to proceed.

#### **5.1.5 Strategy 5: Procedure to protect Aboriginal heritage sites within or adjacent to the study area not subject to harm**

This strategy has been formulated in accordance with Conditions C18 (c), C18 (d) and D26.

The boundaries of all Aboriginal heritage sites that are located within the study area not subject to harm will be:

- Clearly marked with a soft buffer (ie. bunting flags) to ensure that no impacts can occur to these sites.
- Included in site heritage inductions.
- Follow the unexpected finds procedure in Appendix E if items are recovered.
- Clearly marked on maps, with a description of the site and site coordinates available to all employees, contractors and sub-contractors as needed (Figure 4).
- Implementation of a soft buffer delineation around the boundary of the identified areas of moderate or high potential and a hard buffer exclusion zone around the Richmond Hill Memorial Gardens, to ensure no impacts to these areas occur (Figure 6).

#### **5.1.6 Strategy 6: Procedure to protect non-Aboriginal heritage items or locations within or adjacent to the study area not subject to harm**

This strategy has been formulated in accordance with Conditions D27 and D41 (a).

The boundaries of all non-Aboriginal heritage sites that are located within or adjacent to the study area not subject to harm will be:

- Clearly marked with a soft buffer (ie. bunting flags) to ensure that no impacts can occur to these sites.
- Included in site heritage inductions.
- Follow the unexpected finds procedure in Appendix E if items are recovered.
- Clearly marked on maps, with a description of the site and site coordinates available to all employees, contractors and sub-contractors as needed (Figure 5).
- Implementation of a soft buffer delineation around the boundary of the identified areas of moderate potential and a hard buffer exclusion zone around the Richmond Hill Memorial Gardens, to ensure no impacts to these areas occur (Figure 6).

#### **5.1.7 Strategy 7: Measures to protect the Richmond Hill Memorial Garden in perpetuity**

This strategy has been formulated in accordance with Conditions C18 (c), C18 (d) and C23.

In consultation with RAPs, St John of God Health Care Inc. shall develop mitigation measures to enable the protection of Richmond Hill Memorial Gardens during the life of the project and in perpetuity. This would involve the following mitigation measures during construction:

- The erection of a 10 metre exclusion zone (hard fenced buffer) throughout the construction period to protect the site during development.

- No impacts made to the memorial site during construction, inclusive of excavation and changes to the gardens, without consultation with the memorial gardens Aboriginal representative and the wider Aboriginal community.
- The memorial gardens will remain in its original location during the construction period.

This would involve the following mitigation measures after construction and in perpetuity:

- The hard fenced buffer used for the exclusion zone would be removed after construction has concluded, returning the memorial gardens to its original state prior to the hospital redevelopment.
- St John of God Inc. (inclusive of the hospital and staff) would be responsible for any maintenance of the site. Liaison with the Aboriginal community should be sought prior to any maintenance, to confirm what is acceptable to do.
- St John of God Inc. (inclusive of the hospital and staff) would be responsible for providing access to the memorial gardens to the public and the Aboriginal community in perpetuity. This will ensure the Aboriginal community can always access the culturally significant memorial site.
- Liaison with the memorial gardens Aboriginal representative and wider Aboriginal community is required should St John of God Inc. or any person/company wish to make any changes to the garden.
- Registration of the memorial gardens on the AHIMS register and the Hawkesbury LEP to ensure specific protocols and assessments are completed prior to any changes moving forward. This would protect the site in perpetuity should any future development occur within or in the vicinity of the item.
- Assurances that the memorial site would remain in its original location once development has concluded.

#### **5.1.8 Strategy 8: Maintaining and managing reasonable access for RAPs to visit the Richmond Hill Memorial Gardens or any identified Aboriginal heritage items located within the study area throughout the operational life of the project**

This strategy has been formulated in accordance with Conditions C18 (c), C18 (d) and C23.

In consultation with RAPs, St John of God Health Care Inc. shall develop a procedure to enable site visits to the Richmond Hill Memorial Gardens or any other identified Aboriginal heritage items by members of the Aboriginal community throughout the life of the project. This would involve the following mitigation measures during construction:

- The erection of a 10 metre exclusion zone (hard fenced buffer) throughout the construction period to protect the site during development.
- No impacts made to the memorial site during construction, inclusive of excavation and changes to the gardens, without consultation with the memorial gardens Aboriginal representative and the wider Aboriginal community.
- The memorial gardens will remain in its original location during the construction period.
- St John of God hospital would be responsible for providing the Aboriginal community with reasonable access to the memorial gardens throughout the duration of construction works. This will ensure the Aboriginal community can continue to access the culturally significant memorial site. This could be undertaken through:
  - Site inductions prior to attendance on site to ensure WHS protocols are being met.

- St John of God Inc. (inclusive of the hospital and staff) would provide the appropriate Personal Protective Equipment (PPE) to ensure the Aboriginal community can safely access the site.
- Access point along the exclusion zone so the Aboriginal community can safely access the site.

#### **5.1.9 Strategy 9: Ongoing consultation with RAPs regarding the management and conservation of Aboriginal cultural heritage throughout the operational life of the project**

This strategy has been formulated in accordance with Conditions C18 (a) and C23.

In consultation with RAPs, St John of God Health Care Inc. shall develop a strategy for consultation with the Aboriginal community in regard to the ongoing management and conservation of Aboriginal cultural heritage within the study area for the operational life of the project.

Consultation with RAPs will be continued throughout the life of this project as per the contingency consultation plan below:

- RAPs should be consulted:
  - Regarding the preparation of the CHMP.
  - In any subsequent revisions or amendments of the CHMP as set out in Section 8.2, with the exception of the minor amendments described in Section 8.2.1.
  - If unanticipated Aboriginal objects are encountered.
  - Within 24 hours of known Aboriginal ancestral remains being encountered.
  - If a strategy for the care, control and storage of Aboriginal objects needs to be developed.
- RAPs should be given a minimum of 14 days to provide comments on any draft reports before submission to Heritage NSW, should they be required (see Appendix D for full details of completed consultation).
- A final copy of these reports should be provided to RAPs within 14 days of report being submitted to Heritage NSW.

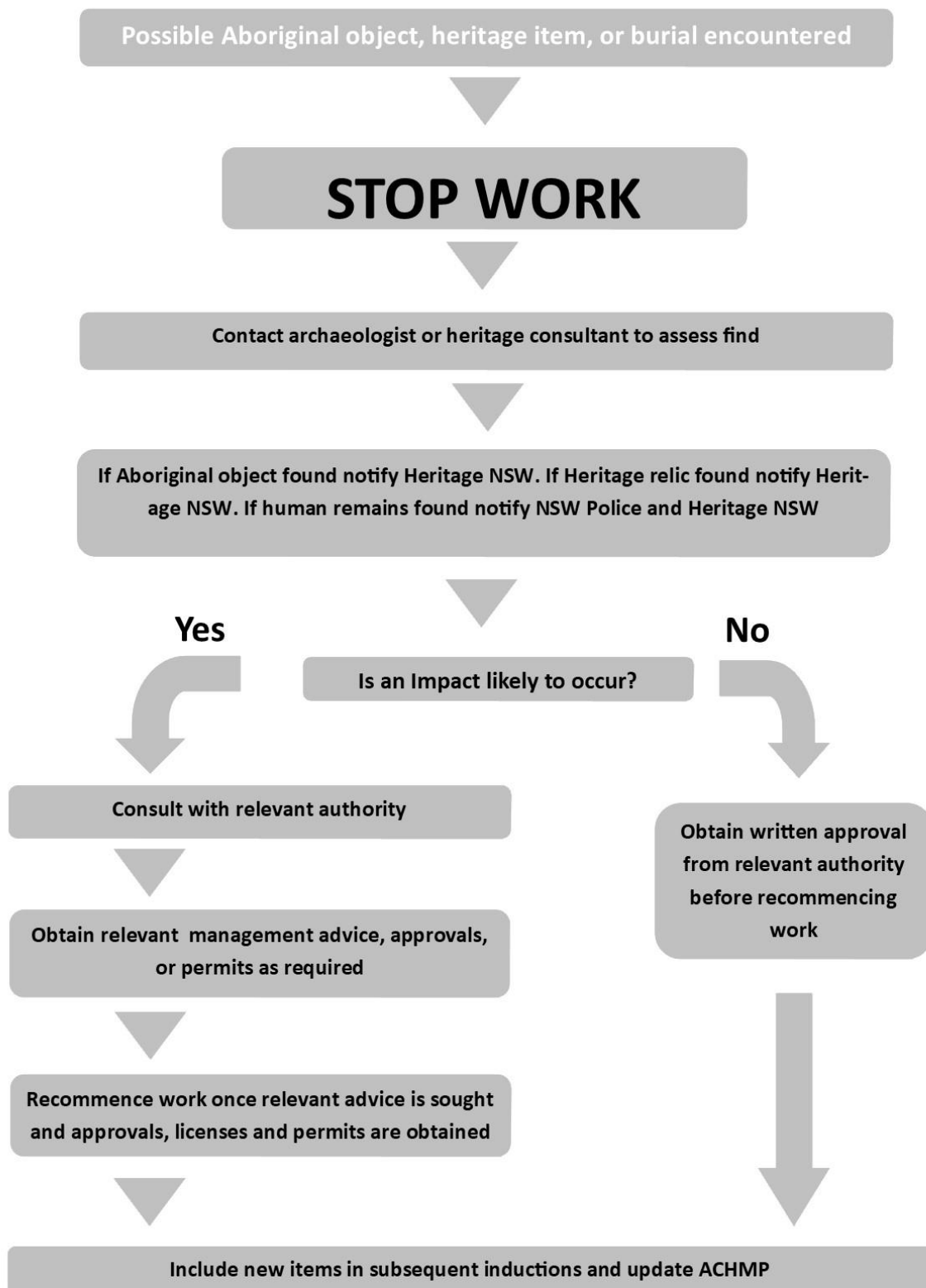
#### **5.1.10 Strategy 10: Contingency plan to follow in the event of chance/unexpected Aboriginal finds**

This strategy has been formulated in accordance with Condition D26.

Should any unexpected Aboriginal objects be identified during the course of the development works then the contingency plan in Appendix E should be followed. Figure 7 provides a flowchart outlining the contingency plan.

Please note that Appendix A contains guidelines around the identification of Aboriginal objects and site types.





**Figure 7 Unexpected finds flowchart**

#### 5.1.11 Strategy 11: Contingency plan to follow in the event of unexpected non-Aboriginal finds

This strategy has been formulated in accordance with Condition D27.

Where non-Aboriginal items are identified, an assessment will need to be made as to the significance of the item. Non-Aboriginal heritage items may include archaeological 'relics' or other non-Aboriginal items (i.e. works, structures, buildings or movable objects). The *Heritage Act 1977* defines a relic as '*...any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and is of State or local heritage significance...*'.

The following process should be followed with respect to unexpected items:

- Should any suspected non-Aboriginal items be encountered during works associated with this proposal, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.
- The archaeologist will investigate and assess the non-Aboriginal item to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the Project Manager within 24 hours stating:
  - Determination of whether the find is a relic.
  - Advice on how the project is to proceed and whether the establishment of any no-go areas is necessary.
  - A recommendation on further works that may be required and timeframe for completion of these works.
- NSW Heritage Division may need to be notified. This will include a statement concerning the find, management measures implemented and notification of any further works arising.
- Should any Aboriginal objects be identified, the procedure outlined in Appendix A shall be implemented.

## 6 Compliance management

### 6.1 Roles and responsibilities

The St John of God Health Care Inc. Project Manager is responsible for ensuring all activities in this CHMP are carried out during operation of the St John of God Richmond Mental Health Facility development, along with reporting any incidents to DPIE and Heritage NSW.

Construction site personnel and contractors must comply with the activities outlined in this CHMP and any deviation to activities outlined in this CHMP must be reported to the St John of God Health Care Inc. Project Manager. Roles and responsibilities are outlined in Table 7.

The CHMP forms part of the Construction Environmental Management Plan (CEMP), as required under Condition C12 of the CoC. The CHMP should be read in conjunction with the CEMP.

**Table 7 Roles and responsibilities and contact details**

Name	Role / responsibility	Contact details
St John of God Health Care Inc.	Project Manager	TBA
Sydney Planning Team	DPIE (Sydney region)	131 555
Heritage NSW	Heritage NSW	131 555 or (02) 9995 5000
Ashley Bridge	Biosis Project Archaeologist	0437 689 734

### 6.2 Compliance

Condition	Description	Location within CHMP
<b>A35</b>	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.	Section 6.4
<b>A36</b>	The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Section 6.4
<b>A37</b>	A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	-

### 6.3 Record keeping

Records of the identified heritage items on the AHIMS standard documentation records must be kept by the archaeologist, site personnel, contractors, and the St John of God Health Care Inc. Project Manager.



## 6.4 Incidents

If an incident occurs that results in actual or potential impacts on known heritage items and/or archaeological items that are discovered unexpectedly or a breach to this consent occurs, DPIE and Heritage NSW will be informed immediately and a report prepared and submitted via the major projects portal.

In line with Condition A35, this notification must be undertaken within seven (7) days of the offense.

The report to DPIE and Heritage NSW should also be sent to the St John of God Health Care Inc. Project Manager, project archaeologist and RAPs and should include:

- The development and the application number.
- Any contravention to the strategies outlined in the CHMP.
- The nature of the incident.
- The actual or likely impact of the incident on Aboriginal objects and/or Aboriginal places or items of historic heritage.
- The nature and location of the Aboriginal objects and/or places, referring to and providing maps and photos where appropriate.
- The measures which have been taken or will be taken to prevent a recurrence of the incident.

## 6.5 Reporting

Reporting requirements and responsibilities of heritage related issues including unexpected finds and breaches of this consent should be documented as outlined in Table 8 below:

**Table 8 Reporting roles and responsibilities**

Action	Responsibility
A short summary report.	Archaeologist
Describe any ongoing consultation with or involvement of RAPs.	Project Manager/Archaeologist
Provide details of the Aboriginal objects which were fully or partially harmed in the course of undertaking the construction or if conditions of this consent are breached.	Construction contractor/Project Manager/Archaeologist
Provide details of the non-Aboriginal items which were fully or partially harmed in the course of undertaking the construction or if conditions of this consent are breached.	Construction contractor/Project Manager/Archaeologist
Comment on the effectiveness of any mitigation measures that were implemented.	Construction contractor
Comment on the effectiveness of any mitigation plan which was in place.	Construction contractor
If any Aboriginal objects were moved to a temporary storage location as part of an unexpected find, a description of the nature and types of Aboriginal objects which are now at that location.	Archaeologist
Detail the results of any analysis of Aboriginal objects.	Archaeologist

Action	Responsibility
Detail the long term management arrangements for any Aboriginal objects.	Archaeologist
If any non-Aboriginal items were moved to a temporary storage location as part of an unexpected find, a description of the nature and types of Aboriginal objects which are now at that location.	Archaeologist
Detail the results of any analysis of non-Aboriginal objects.	Archaeologist
Detail the long term management arrangements for any non-Aboriginal objects.	Archaeologist

## 7 Training and awareness

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All site personnel must comply with all St John of God Health Care Inc. Work Health and Safety (WHS) manuals and procedures. As part of the operation of the St John of God Richmond Mental Health Facility development, site personnel must undertake a cultural heritage induction which will include:

- A description of Aboriginal cultural heritage in Australia.
- A description of Aboriginal cultural heritage in the Hawkesbury LGA.
- A description of the tangible and intangible aspects of Aboriginal heritage and why it is important.
- An overview of the NPW Act and the Heritage Act and the implications and fines applicable for breaching the Acts.
- A general overview of historic heritage in the Hawkesbury LGA.
- A description of all non-Aboriginal heritage site types within the study area.
- The process for reporting unknown cultural heritage sites.
- The process for reporting damage to cultural heritage sites.
- The process for reporting human remains.

In addition to the above, Biosis will provide an overview of the Richmond Hill Memorial Garden and two areas of moderate non-Aboriginal archaeological potential, which has been identified within the St John of God Richmond Mental Health Facility development. This will include:

- The site boundaries and how they have been marked.
- The content of the site/s.



## 8 Review and improvement

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### 8.1 Continuous improvement

Opportunities for the improvement of this CHMP will be found through the ongoing evaluation of environmental management performance against environmental policies, objectives and targets. The purpose of this is to:

- Identify opportunities for the improvement of environmental management and performance.
- Determine the cause or causes of non-conformances and deficiencies.
- Development and implementation of a plan of corrective and preventative actions to address any non-conformances and deficiencies in this CHMP.
- Corroborate the efficiency of the corrective and preventative actions.
- Document any changes in procedures resulting from process improvement.
- Revise the objectives and targets of this CHMP accordingly.

### 8.2 CHMP update and amendment

Updates and amendments will occur as needed. A draft copy of the CHMP have been sent to the relevant stakeholders who endorsed the recommendations of the draft CHMP (see Appendix D). A copy of the updated CHMP and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure within 14 days of finalisation.

Revisions to this CHMP, if required, must be undertaken by a suitably qualified archaeologist in consultation with St John of God Health Care Inc., DPIE and Heritage NSW. With the exception of the minor changes defined below, the amended CHMP must be forwarded to RAPs for review and comment if required and also forwarded to the Planning Secretary for approval.

A review and amendment to this CHMP must be conducted by a suitably qualified archaeologist in the following instances:

- If recommended by an independent audit.
- Within one month of changes to the Conditions of Consent, license conditions or relevant legislation relating to Aboriginal heritage.
- Within one month of any reportable Aboriginal heritage or non-Aboriginal heritage-related incidents within the Project's construction footprint.
- Within one month of the discovery of a previously unidentified heritage item.

Revised versions of the CHMP will be made available and distributed to RAPs through the processes described in Section 5.1.9. Changes will also be communicated through toolbox talks to existing onsite personnel and incorporated into environmental induction materials.

#### 8.2.1 Minor permissible amendments

Minor permissible changes to the CHMP which do not require comments from RAPs or the Planning Secretary are as follows:

- Changes that are administrative in nature (e.g. staff and agency/authority name changes).
- Changes in response to audit findings or periodic reviews, subject to the significance of any audit or review findings.
- Do not compromise the ability of the Project to meet legislative requirements and are consistent with terms of the approval, and does not include any modifications to the terms of Project approval.

## References

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Allen, J. and O'Connell, J. (2003) 'The long and the short of it: archaeological approaches to determining when humans first colonised Australia and New Guinea', *Australian Archaeology*, 57, pp. 5–19.

Australia ICOMOS (2013) *The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance*. Burwood, VIC: Australia ICOMOS.

Biosis (2020a) *St John of God Mental Health Facility Aboriginal Cultural Heritage Assessment*. Report for Johnstaff on behalf of St John of God. Authors: M. Lucas and A. Bridge, Biosis Pty Ltd, Sydney, NSW. Project no. 31057.

Biosis (2020b) *St John of God Mental Health Facility Archaeological Report*. Report for Johnstaff on behalf of St John of God. Authors: M. Lucas and A. Bridge, Biosis Pty Ltd, Sydney, NSW. Project no. 31057.

Biosis (2021) *St John of God Historical Archaeological Assessment*. Report prepared for Johnstaff. Lucas, M., Allen, C. Biosis Pty Ltd. Sydney, NSW. Project no 34858.

Bowler, J.M. *et al.* (2003) 'New ages for human occupation and climatic change at Lake Mungo, Australia', *Nature*, 421(6925), pp. 837–840. Available at: <https://doi.org/10.1038/nature01383>.

DECCW (2010a) *Aboriginal Cultural Heritage Consultation Requirements for Proponents*. Sydney NSW: New South Wales Government Department of Environment and Climate Change.

DECCW (2010b) *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*. Sydney NSW: Department of Environment and Climate Change.

NSW Heritage Branch, Department of Planning (2009) 'Assessing Significance for Historical Archaeological Sites and "Relics"'. Heritage Council of NSW. Available at: <https://www.environment.nsw.gov.au/resources/heritagebranch/heritage/ArchSignificance.pdf>.

OEH (2011) 'Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW'. Available at: Office of Environment and Heritage, Department of Premier and Cabinet, Sydney NSW.

Weir Phillips Heritage and Planning (2020) *Heritage Impact Statement. St. John of God Hospital, 177 Grose Vale Road, Richmond*.



## Appendix A: Identifying Aboriginal objects and site types

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*See the heritage induction document for full details on Aboriginal objects and site types.*

## Appendix B: Identifying non-Aboriginal heritage items

---

*See the heritage induction document for full details on non-Aboriginal heritage items.*

## Appendix C: Resume of report authors

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# Ashley Bridge

## Position

Project Archaeologist

## Qualifications

**Master of Archaeological Science (Adv)  
(Hons)**

**BA Archaeology (major) and Ancient  
History (minor)**



## Professional experience

Ashley joined Biosis at the Sydney Office as a Research Assistant – Heritage in 2018. She completed her Masters in Archaeological Science in 2016, having written a thesis on forensic stature in Australian mass casualty scenarios, developing equations that allow anthropologists to discern stature in a female Australian population.

Ashley has undertaken field work in Australia and Europe over the past seven years, spending 2017 in Transylvania, Romania, Menorca, and Spain, as a volunteer. In 2018, Ashley has undertaken fieldwork for Biosis throughout Sydney, Newcastle, Wollongong and Western New South Wales, with a focus in both Aboriginal and historical archaeology. In 2022, Ashley was promoted to Project Archaeologist. This has allowed her to further develop her skills in Aboriginal and historical excavations in Australia, while also honing her skills in reporting, administrative and client liaison tasks. She also has experience with desktop research and Aboriginal consultation practices in an Australian context.

## Key project experience

### Archaeologist

Historical archaeological excavations in Moorebank: Ashley was part of a team conducting excavations in Moorebank ahead of the State Significant Infrastructure (SSI) that will be implemented in the area. She assisted project managers by conducting excavations, setting up for photos and other data collection including recording and mapping features.

### Archaeologist

Aboriginal Cultural Heritage Assessment and historical test excavations in Rouse Hill; Ashley was the project manager for a Aboriginal assessment and testing excavations, where she was in charge of a team conducting excavations along Worcester Road ahead of a residential subdivision. She liaised with the Aboriginal community and conducted test excavations and data collection, including recording and mapping features. She also completed the lithic analysis and wrote the report.

**Archaeologist**

Historical Heritage Assessment and Statement of Heritage Impact in Woronora; Ashley assisted the project manager in site inspections, reporting and client liaison for the structural and safety amendments to the Woronora River bridge. She provided succinct impact assessments for varying proposed work packages and as a portion of the project fell within Commonwealth land, had to ensure advice and proposed works were undertaken in accordance with the *Environment Protection and Biodiversity Conservation Act 1999*.

**Archaeologist**

Aboriginal and historical constraints assessment in Macquarie Park; Ashley was project manager for a constraints assessment for bus interchange upgrades adjacent to Macquarie University. Ashley liaised with clients, the Aboriginal land council and conducting a desktop assessment of the study area. She also collated and synthesized the previous archaeological assessments undertaken within the study area.

**Archaeologist**

Historical archaeological excavations in Wollongong: Ashley was part of a team conducting excavations in Wollongong ahead of a six-storey office complex that will be implemented in the area. She assisted project managers by conducting excavations, setting up for photos, drawing scale maps and plans, in addition to other data collection methods including recording features.

**Other qualifications and training**

White Card Certification (2353982) – EOT Training

First Aid Certificate – St. Johns Ambulance Australia

Working with Children Check

**Professional affiliations and memberships**

Australian Archaeological Association (AAA) – Member 2019-2021

**Publications**

**Bridge, A.L.**, Oxenham, M.F. and Miskiewicz, J.J. 2018. *Estimating stature using human forearm and leg anthropometric data in an Australian female sample*. Australian Journal of Forensic Sciences, pp.1-13.

## Appendix D: RAP and Heritage NSW consultation

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## Review of draft CHMP

Following completion of the draft CHMP, it was provided to RAPs on 27 June 2022 for review and comment. RAPs were given 14 days to provide comments and responses were received as detailed below.

Organisation contacted	Date and type of contact	Date and type of response	Response details
<b>A1 Indigenous Services</b>	27/06/2022 – email	–	–
<b>Amanda Hickey Cultural Services</b>	27/06/2022 – email	–	–
<b>Barking Owl Aboriginal Corporation</b>	27/06/2022 – email	–	–
<b>Butucarbin Aboriginal Corporation</b>	27/06/2022 – email	–	–
<b>Butucarbin Cultural Heritage Assessment</b>	27/06/2022 – email	–	–
<b>Deerubbin Local Aboriginal Land Council</b>	27/06/2022 – email	–	–
<b>Didge Ngunawal Clan</b>	27/06/2022 – email	02/07/2022 – email	All good from our end, thanks.
<b>Goodradigbee Cultural &amp; Heritage Aboriginal Corporation</b>	27/06/2022 – email	–	–
<b>Kamilaroi Yankuntjatjara Working Group</b>	27/06/2022 – email	–	–
<b>Merrigarn</b>	27/06/2022 – email	–	–
<b>Muragadi</b>	27/06/2022 – email	–	–
<b>Murra Bidgee Mullangari Aboriginal Corporation</b>	27/06/2022 – email	03/07/2022 – email	I have read the project information and CHMP for the above project, I endorse the recommendations made.
<b>Murramarang</b>	27/06/2022 – email	–	–
<b>Paul Gale</b>	27/06/2022 – email	–	–
<b>Richmond Hill Memorial Site Representative</b>	11/07/2022 – email	18/07/2022 – email	I have read the document and find nothing of note that needs to be changed.
<b>Waawaar Awaa</b>	27/06/2022 – email	–	–
<b>Widescope Indigenous Group</b>	27/06/2022 – email	–	–



## Ashley Bridge

---

**From:** Ashley Bridge  
**Sent:** Monday, 27 June 2022 5:28 PM  
**Subject:** 37010 - St John of God Mental Health Facility - Cultural Heritage Management Plan - Aboriginal Stakeholder review

Good evening,

Thank you for your continued registration and patience regarding the St John of God Mental Health Facility Redevelopment project, originally commenced in 2019. The client received their determination for the SSD application on 24 March 2022, and as part of the Conditions of Consent for this project a Cultural Heritage Management Plan (CHMP) and heritage induction document has been created for the study area.

Please see below a link to the CHMP and heritage induction document for the project.

<https://spaces.hightail.com/receive/K7VTh5kxAw>

If you could please provide comment on this document at your earliest convenience, that would be greatly appreciated. Consultation closure is on **11 July 2022 at 5pm**.

Kind regards,  
Ashley

**Ashley Bridge**  
Project Archaeologist

☎ 0437 689 734  
☎ (02) 9101 8700  
✉ [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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## Ashley Bridge

---

**From:** Ashley Bridge  
**Sent:** Thursday, 14 July 2022 1:19 PM  
**To:** 'Coordinator'  
**Subject:** RE: 37010 - St John of God Mental Health Facility - Cultural Heritage Management Plan - Aboriginal Stakeholder review

**Importance:** High

Hi Melissa,

Please see a new link below:

<https://spaces.hightail.com/receive/ctzDRfbHl6>

Thanks!

Ashley

**Ashley Bridge**  
Project Archaeologist

☎ 0437 689 734  
☎ (02) 9101 8700  
✉ [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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---

**From:** Coordinator <[coordinator@merana.org.au](mailto:coordinator@merana.org.au)>  
**Sent:** Thursday, 14 July 2022 12:30 PM  
**To:** Ashley Bridge <[abridge@biosis.com.au](mailto:abridge@biosis.com.au)>  
**Subject:** RE: 37010 - St John of God Mental Health Facility - Cultural Heritage Management Plan - Aboriginal Stakeholder review

Hi Ashley

The link isn't working.

Cheers

Melissa

---

**From:** Ashley Bridge <[abridge@biosis.com.au](mailto:abridge@biosis.com.au)>  
**Sent:** Monday, 11 July 2022 11:31 AM  
**To:** Coordinator <[coordinator@merana.org.au](mailto:coordinator@merana.org.au)>

**Subject:** FW: 37010 - St John of God Mental Health Facility - Cultural Heritage Management Plan - Aboriginal Stakeholder review

**Importance:** High

Hi Melissa,

I've just left you a voicemail regarding the Cultural Heritage Management Plan for this project (see below). If you could give me a call to discuss as soon as possible, that would be amazing.

Please note that the CHMP is in regards to the St John of God Mental Health Facility Redevelopment project, however has specific strategies in relation to the Richmond Hill Memorial Gardens (as the representative for this site, I would appreciate your input prior to finalisation).

Kind regards,  
Ashley

**Ashley Bridge**  
Project Archaeologist

☎ 0437 689 734  
☎ (02) 9101 8700  
✉ [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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---

**From:** Ashley Bridge <[abridge@biosis.com.au](mailto:abridge@biosis.com.au)>

**Sent:** Monday, 27 June 2022 5:28 PM

**Subject:** 37010 - St John of God Mental Health Facility - Cultural Heritage Management Plan - Aboriginal Stakeholder review

Good evening,

Thank you for your continued registration and patience regarding the St John of God Mental Health Facility Redevelopment project, originally commenced in 2019. The client received their determination for the SSD application on 24 March 2022, and as part of the Conditions of Consent for this project a Cultural Heritage Management Plan (CHMP) and heritage induction document has been created for the study area.

Please see below a link to the CHMP and heritage induction document for the project.

<https://spaces.hightail.com/receive/K7VTh5kxAw>

If you could please provide comment on this document at your earliest convenience, that would be greatly appreciated. Consultation closure is on **11 July 2022 at 5pm**.

Kind regards,  
Ashley

**Ashley Bridge**  
Project Archaeologist

☎ 0437 689 734  
☎ (02) 9101 8700  
✉ [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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## Tanya Erofeev

---

**From:** Darleen Johnson <murrabidgeemullangari@yahoo.com.au>  
**Sent:** Sunday, 3 July 2022 12:29 PM  
**To:** Ashley Bridge  
**Subject:** Re: 37010 - St John of God Mental Health Facility - Cultural Heritage Management Plan - Aboriginal Stakeholder review

Hi Ashley  
I have read the project information and CHMP for the above project, I endorse the recommendations made.  
Kind regards  
Ryan Johnson  
0475565517

On Monday, 27 June 2022 at 05:27:59 pm AEST, Ashley Bridge <abridge@biosis.com.au> wrote:

Good evening,

Thank you for your continued registration and patience regarding the St John of God Mental Health Facility Redevelopment project, originally commenced in 2019. The client received their determination for the SSD application on 24 March 2022, and as part of the Conditions of Consent for this project a Cultural Heritage Management Plan (CHMP) and heritage induction document has been created for the study area.

Please see below a link to the CHMP and heritage induction document for the project.

<https://spaces.hightail.com/receive/K7VTh5kxAw>

If you could please provide comment on this document at your earliest convenience, that would be greatly appreciated. Consultation closure is on **11 July 2022 at 5pm**.

Kind regards,

Ashley

**Ashley Bridge**  
Project Archaeologist

📠 0437 689 734  
☎ (02) 9101 8700  
✉ [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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## Tanya Erofeev

---

**From:** lilly carroll <didgengunawalclan@yahoo.com.au>  
**Sent:** Saturday, 2 July 2022 7:20 AM  
**To:** Ashley Bridge  
**Subject:** Re: 37010 - St John of God Mental Health Facility - Cultural Heritage Management Plan - Aboriginal Stakeholder review

All good from our end thanks Ashley

[Sent from Yahoo Mail for iPhone](#)

On Monday, June 27, 2022, 5:27 pm, Ashley Bridge <abridge@biosis.com.au> wrote:

Good evening,

Thank you for your continued registration and patience regarding the St John of God Mental Health Facility Redevelopment project, originally commenced in 2019. The client received their determination for the SSD application on 24 March 2022, and as part of the Conditions of Consent for this project a Cultural Heritage Management Plan (CHMP) and heritage induction document has been created for the study area.

Please see below a link to the CHMP and heritage induction document for the project.

<https://spaces.hightail.com/receive/K7VTh5kxAw>

If you could please provide comment on this document at your earliest convenience, that would be greatly appreciated. Consultation closure is on **11 July 2022 at 5pm**.

Kind regards,

Ashley

**Ashley Bridge**  
Project Archaeologist

☎ 0437 689 734  
☎ (02) 9101 8700  
✉ [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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## Tanya Erofeev

---

**From:** Coordinator <coordinator@merana.org.au>  
**Sent:** Monday, 18 July 2022 6:15 PM  
**To:** Ashley Bridge  
**Subject:** RE: 37010 - St John of God Mental Health Facility - Cultural Heritage Management Plan - Aboriginal Stakeholder review

Hi Ashley

I have read the document and find nothing of note that needs to be changed.

Cheers

Melissa

---

**From:** Ashley Bridge <abridge@biosis.com.au>  
**Sent:** Thursday, 14 July 2022 1:19 PM  
**To:** Coordinator <coordinator@merana.org.au>  
**Subject:** RE: 37010 - St John of God Mental Health Facility - Cultural Heritage Management Plan - Aboriginal Stakeholder review  
**Importance:** High

Hi Melissa,

Please see a new link below:

<https://spaces.hightail.com/receive/ctzDRfbHl6>

Thanks!

Ashley

**Ashley Bridge**  
Project Archaeologist

☎ 0437 689 734  
☎ (02) 9101 8700  
✉ [abridge@biosis.com.au](mailto:abridge@biosis.com.au)



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## Appendix E: Chance/Unexpected finds contingency plan

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In the event that unexpected Aboriginal objects or sites are located, an assessment will need to be made as to the significance of the object. Appendix A contains guidelines around the identification of Aboriginal objects.

The following process should be followed with respect to unexpected finds:

- Should any Aboriginal objects be encountered during works associated with this proposal, works must cease in the vicinity and Heritage NSW must be notified immediately. The find should not be moved until assessed by a qualified archaeologist.
- A 10 metre no-go area should be established around the suspected Aboriginal object, and clearly demarcated with flagging tape or similar.
- The archaeologist will investigate and assess the Aboriginal object to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required. The archaeologist must supply written advice to the Project Manager within 24 hours stating:
  - A determination of whether the find is an Aboriginal object.
  - Advice on how the project is to proceed and whether the establishment of any no-go areas is necessary.
  - A recommendation on further works that may be required and timeframe for completion of these works.
- Heritage NSW and RAPs will be notified. This will include a report stating the background of the find, find characteristics, management measures implemented and notification of any further works or management measures arising. RAPs are to be involved in any further assessments or works as required.
- AHIMS site cards will be prepared for each new site identified and submitted to AHIMS in accordance with the Code.

Should any Aboriginal objects be identified, this will trigger a review of this CHMP in accordance with Section 8.

In the event that unexpected non-Aboriginal objects or sites are located, an assessment will need to be made as to the significance of the object. Non-Aboriginal heritage items may include archaeological 'relics' or other historical items (i.e. works, structures, buildings or movable objects). Appendix B contains guidelines around the identification of non-Aboriginal heritage items.

The *Heritage Act 1977* defines a relics as:

*any deposit, artefact, object or material evidence that relates to the settlement of the area that comprises NSW, not being Aboriginal settlement; and is of State or local heritage significance.*

This includes non-Aboriginal human remains with heritage value. Headstones, grave enclosures, grave goods and associated objects may also be considered relics under the *Heritage 1977 Act*.

The following process must be followed with respect to unexpected historical heritage items:



- Should any suspected historical heritage items be encountered during works associated with this development, works must cease in the vicinity and the find should not be moved until assessed by a qualified archaeologist.
- Secure the location by cordoning off a minimum 10 metre buffer zone around the object. This will need to be established in consultation with a qualified archaeologist who will need to assess the find.
- Photograph the find and send the photograph to the project archaeologist.
- The archaeologist will investigate and assess the item to determine the nature, extent and significance of the find. This will enable recommendations to be provided on how work can proceed and whether any further work is required.
- If the find is considered to be of heritage significance, Heritage NSW will need to be notified. This will include a statement concerning the find, its significance, and the established management measures to avoid further impact.

Before works can recommence, relevant approvals may need to be obtained under the Heritage Act.