

Heritage Management Plan

Eurobodalla Southern Water Supply Storage Project



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Appendix A: Unexpected Finds Procedure

Glossary/ Abbreviations

Term / Abbreviation	Definition / Expanded text
Aboriginal place	An Aboriginal Place is an area declared by the Minister administering the Act to be of special significance with respect to Aboriginal culture.
Aboriginal objects	Aboriginal objects include any deposit, object or material evidence (not being a handicraft made for sale), including Aboriginal remains, relating to the Aboriginal habitation of NSW, before or concurrent with occupation by non-Aboriginal people, as defined in section 5 of the NPW Act
CEMP	Construction Environmental Management Plan
Development	The development described in the Eurobodalla Southern Water Supply Storage Environmental Impact Statement
Development Consent	The Minister for Planning's approval SSD 7089 dated 17 October 2019
Development Consent Conditions	The Minister for Planning's Minister's Development Consent Conditions contained in approval SSD 7089 dated 17 October 2019
DPE	NSW Department of Planning and Environment
DPI	NSW Department of Primary Industries
EIS	Environmental Impact Statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EWMS	Environmental Work Method Statements
Heritage Act	<i>Heritage Act 1997</i>
HMP	Heritage Management Plan
PAD	Potential Archaeological Deposit
REMM	Revised Environmental Management Measures identified in Appendix 2 of the Development Consent

Document Control and Records

Documentation and document control for this Plan, including issue of any amendments will be done generally in accordance with the contract. This Plan is maintained by Haslin Constructions (Haslin) and maintained throughout construction through regular reviews carried out on an initial 3 month of the project starting then on a biannually basis, or as changes require.

At all times an up-to-date copy of this plan shall be kept on site and made available to all employees and contractors involved in the project. Amendments that are made to this document are recorded on the register of amendments below and shall be approved by management staff. Superseded versions of this document shall be maintained for a period of 7 years to demonstrate record of environmental management and compliance.

This document shall be created and approved by the client. A controlled copy shall be supplied to all relevant parties, and distribution of controlled copies shall be recorded on the distribution register below (controlled hardcopy only). When changes are made to this document, parties listed below shall be provided with updates.

Register of Amendments				
Date:	Version No.:	Description of Amendments:	Prepared by:	Approved by:
02/08/22	0	Draft	NF	AL
10/08/22	1	Responding to ESC comments	NF	AL
30/09/22	B	Minor updates	NF	AL

Company Management Plan Authorisation			
	Name/Position	Date:	Signature
Prepared by:	Nicholas Francesconi Environmental Consultant	30/09/2022	
Reviewed by:	Andrew Lynam Environmental Manager	30/09/2022	
Approved by:	Colin Woods Managing Director	30/09/2022	

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1 Introduction

1.1 Context

This Heritage Management Plan (HMP or Plan) forms part of the Construction Environmental Management Plan (CEMP) for Eurobodalla Southern Water Supply Storage (the Project).

This HMP has been prepared to address the requirements of the Minister's Development Consent (CoA), the environmental management measures listed in the Eurobodalla Southern Water Supply Storage Environmental Impact Statement (EIS) and all applicable legislation.

1.2 The approved project

The Eurobodalla Southern Water Supply Storage (the Project) was granted Development Consent from the Department of Planning and Environment (DPE) on 17 October 2019. Development Consent is provided in Appendix A of the CEMP.

The Project consists of an off-stream water storage facility and associated ancillary facilities. Water would be extracted from the Tuross River, using a new river intake pump station, and transferred to the storage via the Storage Inlet Pipeline. As necessary, the storage volume would be supplemented by water extracted from an existing borefield adjacent the storage.

Key features of the Project include:

- a 3,000 megalitre storage capacity,
- a 370 metre long embankment, 39 metres in height and a crest width of 20 metres located on an unnamed tributary of the Tuross River,
- a spillway,
- permanent erosion control structures located downstream of the spillway,
- inlet works to convey and dissipate raw water transferred from the river intake pump station through a pipeline constructed along the left abutment to the proposed water storage facility,
- outlet works to allow transfer of water from the storage to the existing southern water treatment plant (WTP),
- instrumentation to monitor seepage, reservoir levels and water quality,
- a consequence category of "High C" for both flood and sunny day scenarios in accordance with the Australian National Committee on Large Dams (ANCOLD) Guidelines on the consequence categories of dams (2012),
- a thermal stratification control system,
- a boat ramp at the storage for maintenance and water quality monitoring, and
- safety and perimeter fencing at the storage.

Key features of the ancillary facilities include:

- new river intake pump station with a total river extraction capacity made up of a combination of flows from the river intake (up to 26 megalitres) and the borefield (up to six megalitres)
- installation of the following new pipelines including:
 - a pipeline with a capacity of 26 megalitres per day to transfer raw water from the new river intake pump station to the storage inlet chute
 - a cross connection to the proposed water storage inlet pipeline with a capacity of six megalitres per day providing connection to supply water from the storage to the balance tank at the existing WTP
 - a pipeline connection from the existing borefield pipeline to the river intake pump station.
- a new storage access road that is about one kilometre in length and extends from

Eurobodalla Road opposite the existing WTP to the embankment crest basic right-turn and basic left-turn treatment at the intersection of the new storage access road and Eurobodalla Road would be provided,

- a new access road that would provide a route for vehicles to access the new river intake pump station, and
- power supply including the construction of new sub-stations located near the storage and the river intake pump station.

1.3 Scope of this Plan

With the approval of the Secretary of Planning, construction of the project is being staged as follows:

- Stage 1: Tuross River Intake Pump Station clearing.
- Stage 2: Tuross River Intake Pump Station construction.
- Stage 3: Vegetation clearing and topsoil stripping of the access road, construction of the access road to the forestry boundary and construction of the inlet pipeline to the forestry boundary.
- Stage 4: Partial clearing of the entire storage site.
- Stage 5: All other works.

Works in Stage 1, Stage 2 and Stage 4 are complete. Stage 3 works are partially complete and will continue to be delivered under the applicable CEMP. This Plan only applies to Stage 5 of the approved project, being the construction of all remaining works on site including the removal of the remaining vegetation within clearing boundary, construction of the embankment wall, spillway, permanent erosion control measures and all remaining works on site to enable the project to become operational. The scope of works and the construction site boundary is detailed in Figure 1-1.

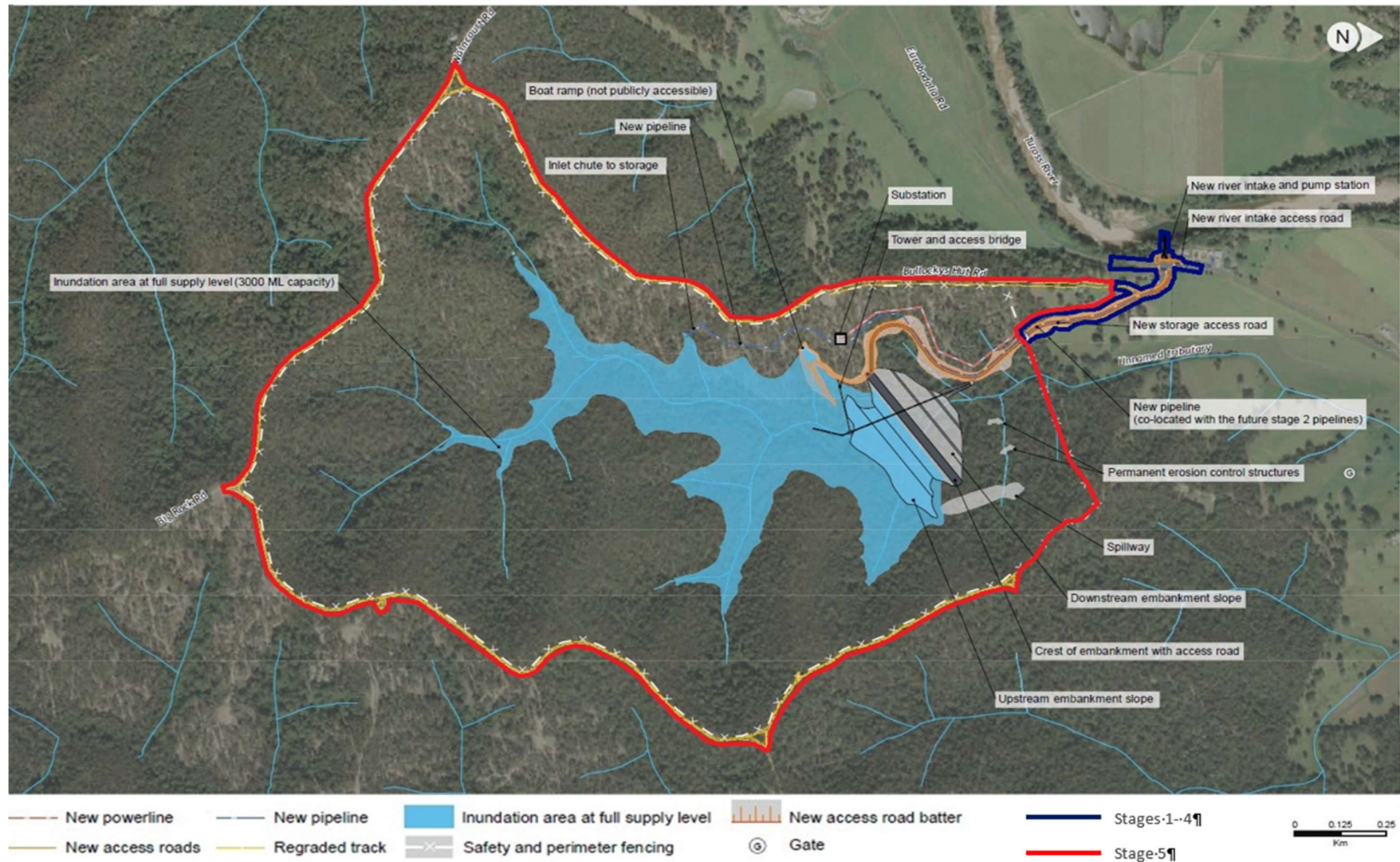


Figure 1-1 Project overview and scope of works covered by the plan (Stage 5)

2 Purpose and objectives

2.1 Purpose

The purpose of this Heritage Management Plan (HMP) is to describe how Haslin Constructions proposes to manage and protect Aboriginal heritage and historic heritage items during construction of the Project.

2.2 Objectives

The key objective of the HMP is to ensure all conditions of the Development Consent, environmental management measures and licence/permit requirements relevant to heritage are described, scheduled and assigned responsibility as outlined in:

- The Environmental Impact Assessment (EIA) prepared for Eurobodalla Southern Water Supply Storage (the Project)
- Submission Report for the Eurobodalla Southern Water Supply Storage Project
- Addendum Submissions Report for the Eurobodalla Southern Water Supply Storage Project
- Revised Secretary's Environmental Assessment Requirements (SEARs)
- Revised Management and Mitigation Measures
- Development Consent SSD 7089 (the Project) granted on 17 October 2019

2.3 Targets

The following targets have been established for the management of Aboriginal heritage or historic heritage impacts during the construction of the project:

- Achieve full compliance with relevant legislative requirements and the Conditions of Consent
- Minimise or avoid impacts on known Aboriginal and non-Aboriginal heritage sites.
- Follow correct procedure and ensure notification of any Aboriginal heritage objects/places uncovered during construction.

3 Environmental requirements

3.1 Relevant legislation and guidelines

3.1.1 Legislation and regulatory requirements

All legislation relevant to this HMP is included in Appendix A1 of the CEMP.

3.1.2 Additional approvals, licences, permits and requirements

Refer to Appendix A1 of the CEMP

3.1.3 Guidelines

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

- Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW 2010) (for reference only).
- Altering Heritage Assets (Heritage Office and DUAP 1996).
- Assessing Heritage Significance (NSW Heritage Office 2001).
- Archaeological Assessment Guidelines (NSW Heritage Office and NSW Department of Urban Affairs and Planning 1996).
- *NSW Government Policy on Aboriginal Participation in Construction* (released 1 May 2015, updated 1 August 2016)
- How to Prepare Archival Recording of Heritage Items (Heritage Branch 1998).

3.2 Ministers Development Consent Conditions

The CoA relevant to this Plan are listed Table 3- below. A cross reference is also included to indicate where the condition is addressed in this Plan or other project management documents.

Table 3-1 Minister's Conditions of Approval

Condition No.	Condition Requirements	Document Reference
B40	If any item or object of Aboriginal heritage significance is identified on site:	Appendix A Unexpected Finds Procedure
	(a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately	
	(b) a 10m wide buffer area around the suspected item or object must be cordoned off, and	
	(c) the EESG must be contact immediately	
B41	Work in the immediate vicinity of the Aboriginal item or object may only commence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974	Appendix A Unexpected Finds Procedure
B42	If any unexpected archaeological relics are uncovered:	Appendix A Unexpected Finds Procedure
	(a) all work in the immediate vicinity of the suspected Aboriginal item or object must cease immediately	
	(b) the Heritage Division DPC must be notified	
	(c) a suitably qualified and experienced archaeologist must record and assess the significance of the find with the results reported to the Planning Secretary and the Heritage Division DPC	
	(d) where required by Heritage Division DPC, a Management Strategy is to be developed and implemented in consultation with the Heritage Division DPC	

Condition No.	Condition Requirements	Document Reference
B43	Work in the immediate vicinity of the find may only recommence on the advice of the archaeologist	Appendix A Unexpected Finds Procedure

3.3 Environmental Management Measures

Relevant EMM are listed in Table 3-2 below. This includes reference to required outcomes, the timing of when the commitment applies, relevant documents or sections of the environmental assessment influencing the outcome and implementation.

Table 3-2: Environmental management measures relevant to this HMP

Ref #	Commitment	Timing	HMP Reference
REMM 5.1	A construction Aboriginal heritage management plan will be prepared for the project. The plan would provide details of management measures and procedures to be carried out during construction to minimise and manage impacts on Aboriginal heritage, and includes an unexpected finds procedure	Pre-construction	This Plan
REMM 5.2	Aboriginal cultural awareness training for all relevant staff and contractors would be carried out prior to commencing work onsite. All relevant staff, contractors and subcontractors will be made aware of their statutory obligations for heritage under the National Parks and Wildlife Act 1974 through an on-site induction	Pre-construction	Table 6-1

Ref #	Commitment	Timing	HMP Reference
REMM 6.1	The following protocol for unexpected finds would be undertaken in accordance with the requirements of the NSW Heritage Manual (OEH 1996): Should an item of historic heritage be identified, works in the vicinity of the find would cease. The Heritage Division (NSW Office of Environment and Heritage) would be contacted prior to further work being carried out in the vicinity of the find.	During construction	Table 6-1 H4 Appendix A Unexpected Finds Procedure

4 Existing Environment

The following sections summarise what is known about factors influencing heritage values of the project area. The key reference documents being Chapters 10,11 and Appendices I and J of the Environmental Impact Statement (EIS).

4.1 Aboriginal history

The traditional custodians of the land surrounding the Bodalla area are the Yuin. This area extends from the Shoalhaven River in the north to Cape Howe in the south. The majority of Aboriginal archaeological sites located in this region date to the last 6,000 years, when the sea levels stabilised to the present level (the Holocene still-stand).

Sites older than 6,000 are rare, as most of them would have been submerged by rising seas. Two coastal sites, Bass Point and Burrill Lake, provide evidence of Pleistocene Aboriginal occupation dating to 17,000BP and 20,000BP (years Before Present) respectively. Prior to the rise in sea levels these sites would have been located some 14 kilometres inland.

The Tuross River would have been a major focus for Aboriginal occupation and use, for its abundant natural resources. The river and its tributaries would have supported abundant plant and animal species during the mid to late Holocene, when climatic conditions were similar to the present day.

Fresh water drainage located in the study area has been the focus for non-marine resources such as macropods and tuber type plants. During the field assessments WLALC made a number of observations about the past resources of the study area:

- small edible shrubs were likely cultivated along past walking tracks (spur crests and ridges), for easily accessed sustenance during travel
- some edible plants that were in the steep gullies and suggested these species would have been more prolific in the past, due to Aboriginal cultivation practices.

4.2 Potential Aboriginal Deposits

A PAD is defined as any location where the potential for subsurface archaeological material is considered to be moderate or high, relative to the surrounding study area landscape. Initial investigations of the project area undertaken as part of the EIS Aboriginal heritage assessment identified the following three Potential Aboriginal Deposits (PADS).

Table 4-1 Potential Aboriginal Deposits

Recording name	GDA Reference	Lot/DP Number
Stony Creek PAD 1	230508.5997362 to 230579.5997363	Lot 3 DP 438839
Stony Creek PAD 2	230646.5997225 to 230693.5992623 to 230663.5997365 to 230581.599354 230511.5997437 to 230593.5997457 to 230538.5997567 to 23086.5997548	Lot 3 DP 438839
Stoney Creek PAD3	230511.5997437 to 230593.5997457 to 230538.5997567 to 23086.5997548	Lot 2 DP 1168581

The location of the three PADS is shown in **Figure 4-1**.

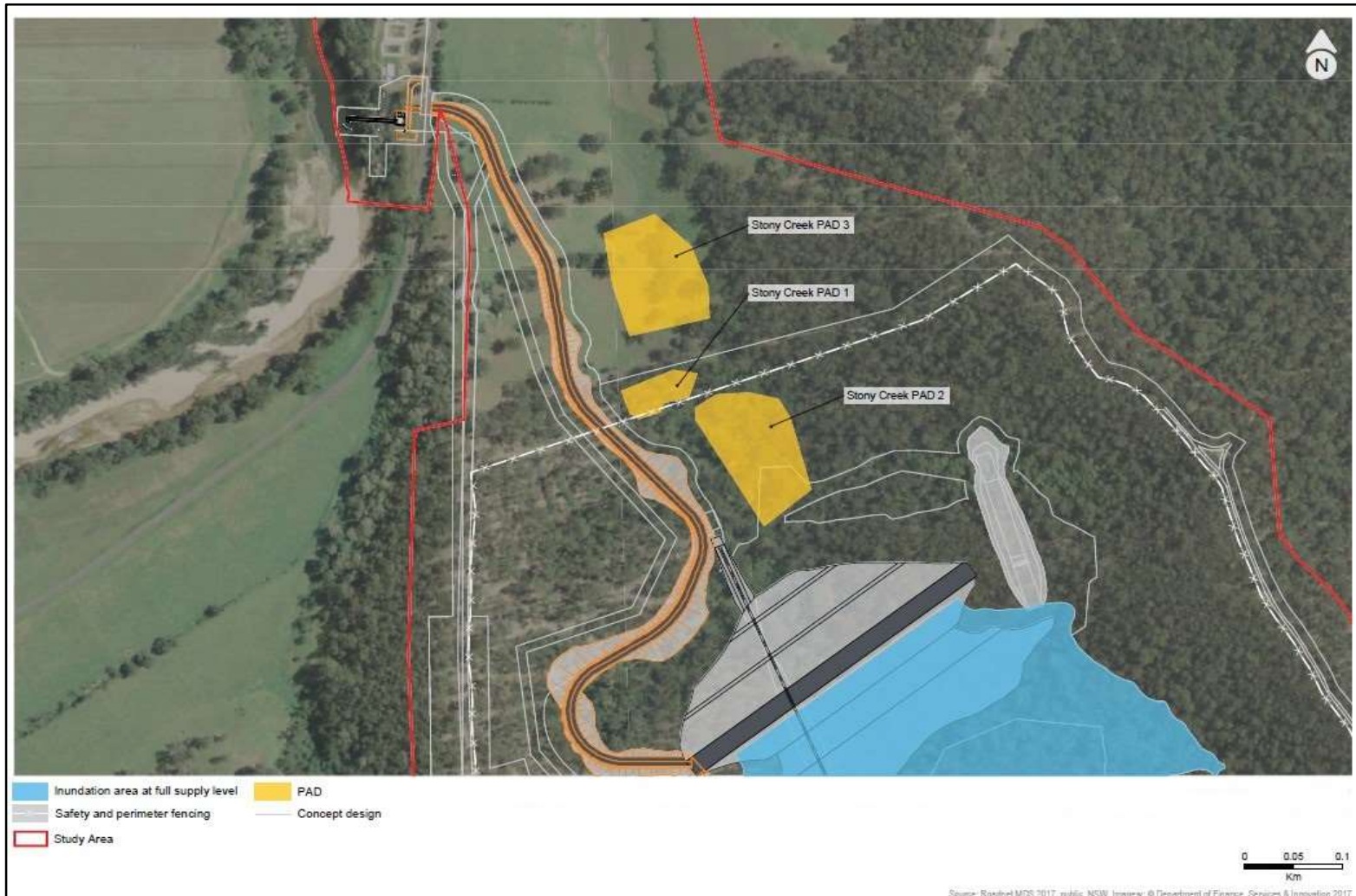


Figure 4-1 Potential Aboriginal Deposits

Further archaeological assessment and field surveys were undertaken due to the potential for direct and indirect impacts on Stony Creek PAD 1 and Stony Creek PAD 2. Given the location of Stony Creek PAD 3 outside of the project footprint it was not necessary to undertake further assessment.

Stony Creek PAD 2

During archaeological test excavations, it was determined that the permanent erosion control structures and operation of the spillway would not impact Stony Creek PAD 2 (refer to Figure 4-2).

Stony Creek PAD 1

Three artefacts were recovered from two of the seven excavated pits along the transect. Two artefacts were recovered from pit 4 and one from pit 2. The artefacts consisted of one unretouched flake, one retouched flake, and one core.

The results of the survey and archaeological test excavation indicate that the areas next to the unnamed tributary and the locally elevated areas were used by Aboriginal people in the past. The artefact density encountered during the test excavations indicates that the study area was used intermittently, possibly for short-term occupation.

Stony Creek PAD 1 includes a scatter of stone artefacts that are currently sitting on the ground surface and in shallow subsurface deposits immediately beneath the surface.

4.3 Historic Heritage

Historic heritage investigations undertaken as part of the EIS determined that there were no historic land grants within the study area and that the project area had been left as forest and fauna reserves before being formally incorporated into the State Forest system in 1966.

The terrain and the lack of arable land means that evidence of settlers is unlikely to be found within the proposed water storage facility area.

The study area has been subjected to surface sheet erosion, especially the moderate to steep slopes impacted by intermittent logging of the State Forest. The low sloping spurs, valley floors, and terraces in the north of the proposal area are relatively stable geomorphically, due to the topographic nature of these landform.

Although the EIS identified four historic heritage sites listed on Eurobodalla LEP, no heritage items or heritage conservation areas were found within or immediately adjacent to the project footprint.

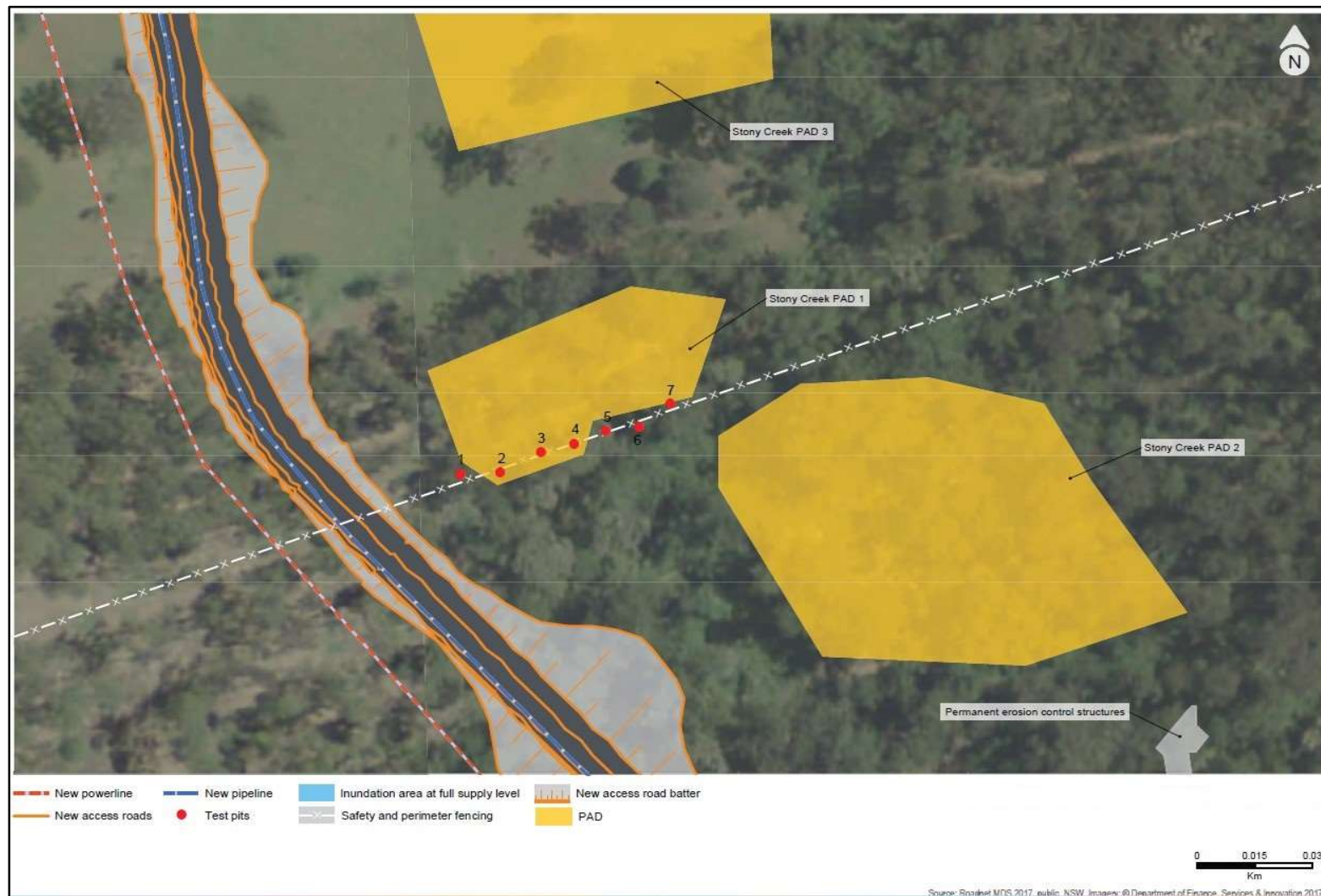


Figure 4-2 Test excavation locations

5 Environmental aspects and impacts

5.1 Impacts on Aboriginal heritage items

A summary of the impacts to Aboriginal heritage is provided in Table 5-1 and described below

Stony Creek PAD 1 would be directly impacted by installation of the fence line where surface and subsurface Aboriginal artefacts may be harmed if encountered. If any artefacts are encountered during construction these would be collected prior to the installation of the fence line by a qualified archaeologist.

The Stony Creek PAD 2 would not be directly or indirectly impacted by the project as it is outside of the project construction footprint.

Table 5-1 Impacts to Aboriginal heritage items

PAD number	Type of harm	Degree of harm	Consequence of harm
Stony Creek PAD1	Will be partially harmed Harm from fence line installation	Partial	Partial Loss of value
Stony Creek PAD2	Will not be harmed Inadvertent harm possible	Nil	No harm
Stony Creek PAD3	Will not be harmed Inadvertent harm possible	Nil	No harm

5.2 Impacts on historic heritage items

As determined in Chapter 11 of the EIS and Section 4.3 above, there are no historic heritage sites or items in or immediately adjacent to the construction footprint that would be impacted by construction of the project.

6 Environmental management measures

Environmental management measures relating to Aboriginal and Historic Heritage were identified in the EIS and the Development Consent (SSD 7089). Specific measures and requirements to manage heritage are described below.

6.1 Key Management Strategies

The following sections outline the key management strategies to avoid impacts to Aboriginal and historic heritage items during construction of the project and have been developed to align with the objectives identified in Section 2.2. The key management strategies include:

- Training and awareness.
- Delineation and identification of no-go zones.
- Implementation of an unexpected finds procedure.

6.2 Training and awareness

An environmental induction as part of the main induction must be carried out by everyone working on the project site prior to works commencing. Details of the induction is discussed in Section 3.4.1 of the CEMP.

To supplement the environmental induction, the following training and awareness mechanisms will be undertaken:

- Toolbox talks.
- Daily pre-start meetings.
- Heritage awareness tools.

Toolbox talks will be one method of raising awareness and educating personnel on issues related to all environmental issues. The toolbox talks are used to ensure environmental awareness continues throughout construction. Toolbox talks will also be tailored to specific environmental issues relevant to upcoming works. Prior to the installation of fencing in the vicinity of Ston

The pre-start meeting is a tool for informing the workforce of the day's activities, safe work practices, environmental protection practices, work area restrictions, activities that may affect the works, coordination issues with other trades, hazards and other information that may be relevant to the day's work.

Heritage awareness tools (posters and information kits) will be used to show the construction staff what heritage items could be found on site and what to do if items are spotted. They will include photos and diagrams to indicate where on site they are likely to be found. Posters will be displayed in site sheds and construction compounds.

6.3 Delineation and identification of no-go zones

'No-go zones' are any areas outside the designated clearing boundary and full supply level as indicated in Figure 6-1. The physical extent of the construction site boundary is to be marked with high visibility bunting and kept in place for the duration of the Project.

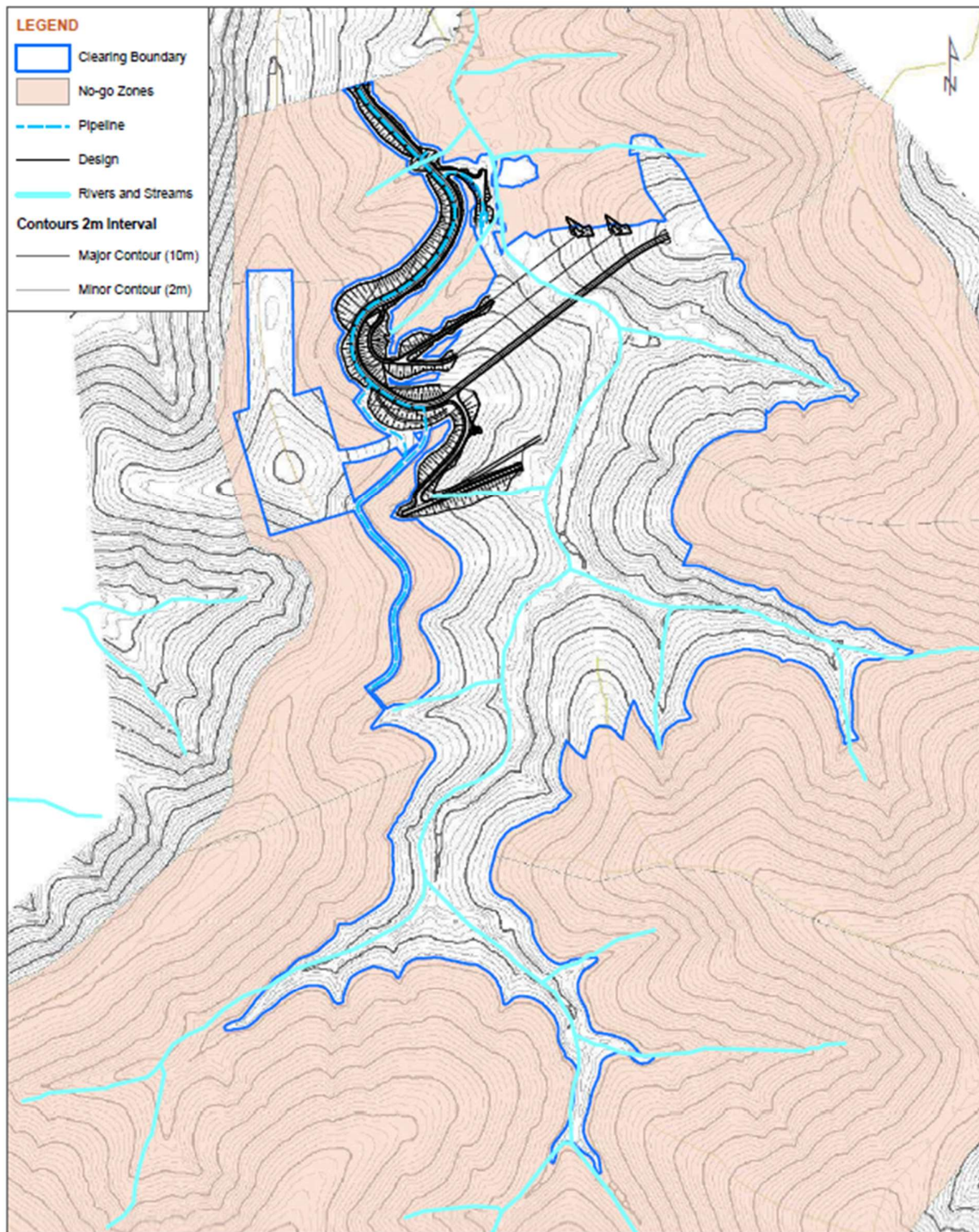


Figure 6-1 Project no-go zones

Table 6-1. Heritage management and mitigation measures

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference	Evidence
H1	'No-go zones' are any areas outside the designated clearing boundary and full supply level as indicated in Figure 6-1. The physical extent of the construction site boundary is to be marked with high visibility bunting and kept in place for the duration of the Project. PADs will be delineated with star pickets at 3m intervals and flag bunting.	Signage	Pre- and during Construction	General Superintendent	REMM 5.1	Signage in place
H2	Aboriginal cultural awareness training for all relevant staff and contractors would be carried out prior to commencing work through an onsite induction.	Induction	Pre- and during Construction	Site Environmental Representative	REMM 5.2	Training records
H3	All relevant staff, contractors and subcontractors will be made aware of their statutory obligations for heritage under the <i>National Parks and Wildlife Act 1974</i> .	Induction	Pre- and during Construction	Site Environmental Representative	REMM 5.2	Training records
H4	The unexpected finds procedure (Appendix A) prepared in accordance with the requirements of the NSW Heritage Manual (OEH 1996) will be implemented on site.	Procedure	Pre- and during Construction	Site Environmental Representative	Conditions of Consent B40, B41, B42, B43	Record of development

ID	Measure/Requirement	Resources needed	When to implement	Responsibility	Reference	Evidence
H5	Opportunities to adjust the alignment of the site boundary fencing to avoid Stony Creek PAD 1 will be investigated in consultation with Eurobodalla Shire Council during detailed design.	Detailed design planning	Detailed design	Senior Project Manager Site Environmental Representative	Conditions of Consent A1	Records of communication

7 Compliance management

7.1 Roles and responsibilities

The Haslin Project Team's organisational structure and overall roles and responsibilities are outlined in Section 3.3 of the CEMP. Specific responsibilities for the implementation of environmental controls are detailed in Section 6 of this Plan.

7.2 Training

All employees, contractors and utility staff working on site will undergo site induction training relating to heritage management issues.

Targeted training in the form of toolbox talks or specific training will also be provided to personnel with undertaking activities with potential to uncover heritage items (eg boundary fencing).

Further details regarding staff induction and training are outlined in Section 3.5 of the CEMP

7.3 Monitoring and inspections

Daily inspections of activities occurring on the worksite will be undertaken by the site supervisor and the environmental manager and site. Observations will be captured on a daily site diary.

Monitoring will focus on the compliance with the requirements of this Plan.

7.4 Auditing

Audits (both internal and external) will be undertaken to assess the effectiveness of environmental controls, compliance with this plan, CoA and other relevant approvals, licenses and guidelines.

Audit requirements are detailed in Section 3.9.4 of the CEMP.

7.5 Reporting

Reporting will be performed in accordance with section 3.9.3 of the CEMP.

8 Review and improvement

8.1 Continuous improvement

Continuous improvement of this plan will be achieved by the ongoing evaluation of environmental management performance against environmental policies, objectives and targets for the purpose of identifying opportunities for improvement.

The continuous improvement process will be designed to:

- Identify areas of opportunity for improvement of environmental management and performance
- Determine the cause or causes of non-conformances and deficiencies
- Develop and implement a plan of corrective and preventative action to address any non-conformances and deficiencies
- Verify the effectiveness of the corrective and preventative actions
- Document any changes in procedures resulting from process improvement
- Make comparisons with objectives and targets.

8.2 HMP update and amendment

The processes described in Section 3.9 to Section 3.13 of the CEMP may result in the need to update or revise this Plan. This will occur as needed.

Only the Environmental Site Representative or delegate, has the authority to change any of the environmental management documentation.

A copy of the updated plan and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure – refer to Section 3.11.2 of the CEMP.

Appendix A

Unexpected finds procedure

