

# Googong Township water cycle project

Modification assessment  
February 2013

*Manid's Roberts*

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# 1 Introduction

## 1.1 Overview

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Stage 1 of the Googong water cycle project comprises the following infrastructure:

- A water recycling plant.
- Two temporary reservoirs for recycled and potable water.
- Four pumping stations including two sewage pumping stations, one bulk water pumping station and one recycled water pumping station.
- Mains pipework (including rising and distribution mains) for sewage, recycled water and potable water to Neighbourhood 1A.
- Rising and distribution mains for sewage, recycled water and potable water.

A Concept Approval for the ultimate development (Stage 1 (infrastructure to service the initial residents of the Googong township in neighbourhood area 1A) and Stage 2 (infrastructure to service the entire Googong township) and Project Approval for Stage 1 of the Googong township water cycle project were granted (MP08\_0236) was approved on 24 November 2011 by the NSW Planning Assessment Commission, under delegation from the Minister for Planning and Infrastructure under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

## 1.2 Purpose of the this report

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Googong Township Pty Ltd (GTPL) seeks approval from the Department of Planning and Infrastructure (DP&I) to modify MP08\_0236 Project Approval for Stage 1 of the Googong water cycle project (the Approved Project). This modification assessment provides an assessment of the potential impacts resulting from the proposed modification and details mitigation measures to manage potential impacts. This report will accompany the application for a modification to the Approved Project, in accordance with Section 75W of the EP&A Act.

# 2 The Approved Project

## 2.1 Googong water cycle project

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Googong Township, to be located in the Canberra region, around seven kilometres south of Queanbeyan in NSW, will be home to about 16,000 people. The water cycle project is required to provide the essential water and wastewater services for the development of the township. The water cycle project aims to reduce potable water consumption by at least 60 per cent and recycle around 60 per cent of the township's wastewater for non-potable use.

Construction of the Approved Project will take place in the following sub-stages:

- Stage A – Network, including:
  - Bulk water pumping station.
  - Potable water reservoir including chemical dosing facilities.
  - Recycled water reservoir including chemical dosing facilities.
  - Sewer pump station (SPS1).
  - Sewer rising main.
  - Potable water rising main.
  - Recycled water rising main.
  - Recycled water gravity main.
  - Potable water gravity main.
  - Reservoir overflow water main.

*Note: that construction of Stage A – Network has been split into two packages of work, Stage A – Network (west) and Stage A – Network (east), to be delivered by separate contractors.*

- Stage A – WRP: construction of the water recycling plant.
- Stage B – Network and WRP: augmentation of the wastewater network and upgrade of the water recycling plant.

Construction of Stage A – Network has commenced. The detailed design phase of Stage A – WRP is underway, with construction scheduled to commence in mid-2013.

The detailed design and construction phases of Stage B – Network and WRP is likely to commence around 2014/2015, dependent on the growth of the township.

This modification assessment relates to Stage A – WRP.

## 2.2 Stage A – WRP

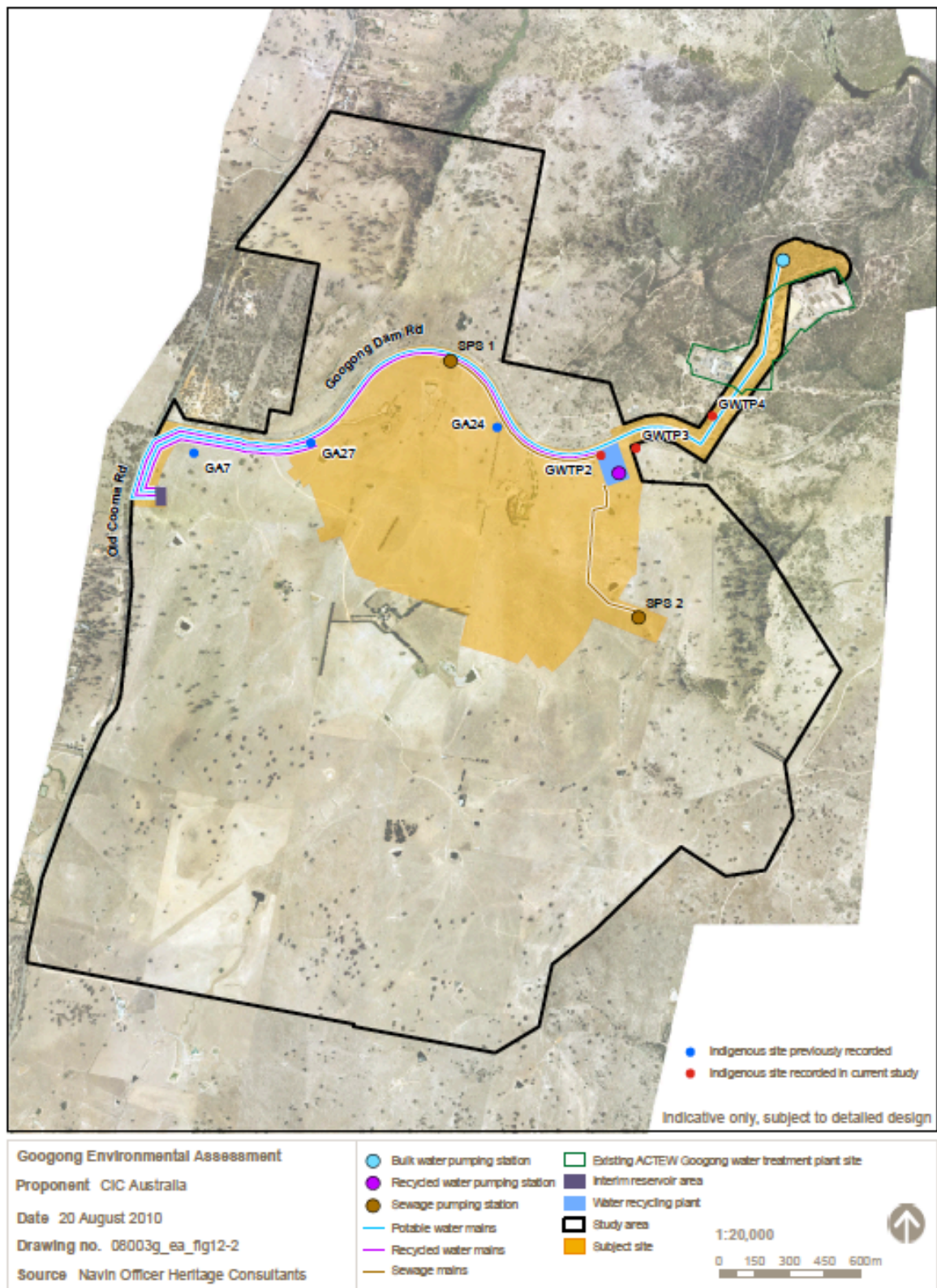
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The environmental assessment provided a concept design of the water recycling plant. The concept design responded to specific design criteria sourced from various design standards and codes, industry practice, modelling simulations and advice from Queanbeyan City Council.

The water recycling plant will treat sewage from the Googong township to a quality suitable for recycling. The plant consists of primary screens and grit removal, a membrane bioreactor (MBR) for nutrient and solids removal and a tertiary stage combining UV treatment and chlorination for disinfectant.

The water recycling plant is designed to provide recycled water for non-potable use including toilet flushing, washing machine use and irrigation.

An Aboriginal heritage site GWTP2 is located adjacent to the water recycling plant (refer Figure 1). The environmental assessment included a commitment to seek to avoid impacts on GWTP2 during detailed design.



**Figure 1** Aboriginal heritage constraints identified in the environmental assessment

# 3 Proposed modification

## 3.1 Description of the proposed modification and need

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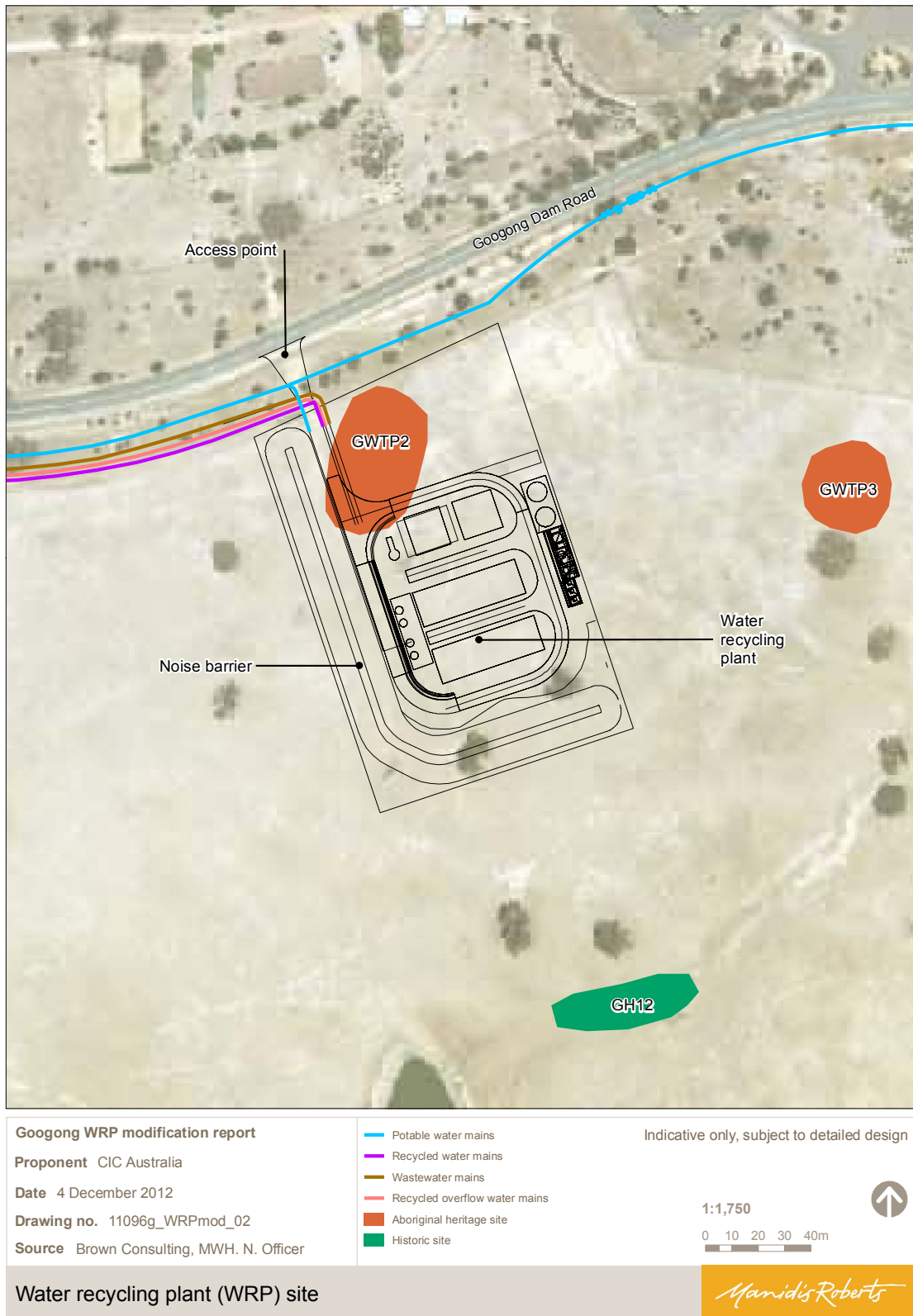
Since Project Approval, GTPL has commenced the water recycling plant detailed design phase.

The concept design, as detailed in the environmental assessment assumed that the four individual reactors would be joined to create two larger reactors. Since commencement of the detailed design phase GTPL has identified that this approach is not feasible due to the need for the future operator/maintainer access between all four reactors. Accordingly the original proposal to combine reactors is not possible.

The proposed change to the Approved Project includes a revised water recycling plant layout to create adequate access between the MBRs. This would ensure that the operation of the water recycling plant can be adequately and safely operated, maintained and accessed.

The revised water recycling plant layout of the plant would extend the footprint of the plant (building and access road) resulting in an encroachment upon site GWTP2. Figure 2 provides an overlay of the revised water recycling plant layout and site GWTP2. Note that the water recycling plant is still progressing through the detailed design phase. Impacts on site GWTP2 are likely to increase further during this phase.





**Figure 2** Revised water recycling plant layout and heritage constraints



## 3.2 Alternatives considered

GTPL has considered a number of options for the location of the water recycling plant. Consideration has been given to the options identified in Table 1. Note that GTPL are required to locate the water recycling plan within the area zoned as SP2 Infrastructure (Sewage Treatment Plant) in the Queanbeyan Local Environmental Plan 2012.

**Table 1** Water recycling plant options

Option	Comment	Preferred Option
Retain the water recycling plant in the location detailed in the environmental assessment	<p>Preferred.</p> <p>Construction of the water recycling plant in the location as detailed in the Approved Project would enable implementation of operational mitigation measures regarding noise and odour.</p> <p>This location reduces the visual impact of the plant for future residential developments to the west and south, as the plant is located within a small gully.</p> <p>While the detailed design sought to avoid impacts on site GWTP2 (located in the northern portion of the site), due to the larger footprint required for adequate operation and maintenance of the plant, the plant layout cannot remain as shown in the concept design in this location and avoid impacts on site GWTP2.</p> <p>While the impacts on site GWTP2 are not consistent with the Approved Project, this option best meets other project objectives.</p>	✓
Shift the water recycling plant site to the west or south of the location detailed in the environmental assessment	<p>Not preferred.</p> <p>This option would avoid impacts on Aboriginal heritage site GWTP2. However, the area to the south is constrained by the presence of non-Aboriginal heritage site GH12, and a local waterway feeding into Montgomery Creek.</p> <p>In addition, the area to the west and south of the water recycling plant forms part of an odour buffer zone, the area provided between the water recycling plant and the future residential development. A shift of the plant to the west or south may reduce the ability of the project to meet operational noise and odour criteria.</p> <p>This option would move the water recycling plant outside the area zoned SP2 (Infrastructure – sewage treatment plant) in the Queanbeyan Local Environment Plan 2012.</p> <p>This option would result in environmental impacts inconsistent with the Approved Project and has not been considered further.</p>	

Option	Comment	Preferred Option
Shift the water recycling plant site to the east of the location detailed in the environmental assessment	<p>Not preferred.</p> <p>This option would avoid impacts on Aboriginal heritage site GWTP2. However, the area to the east of the water recycling plant is constrained by the presence of Aboriginal heritage site GWTP3.</p> <p>This option would result in impacts on site GWTP3 that are not consistent with the Approved Project.</p> <p>This option would move the water recycling plant outside the area zoned SP2 (Infrastructure – sewage treatment plant) in the Queanbeyan Local Environment Plan 2012.</p>	

### 3.3 Consistency with Approved Project

A consistency assessment of the proposed water recycling plant layout with the Approved Project was carried out (refer to Appendix 1). The consistency assessment concluded that the location of the water recycling plant would result in impacts on Aboriginal heritage (site GWTP2) that are not consistent with the Approved Project. Specifically the proposed water recycling plant layout would result in inconsistencies with condition of approval (CoA) C4:

*The Proponent shall not impact items of Aboriginal or non-indigenous heritage significance identified in the EA.*

The consistency assessment concluded that all other impacts associated with the proposed modification would remain consistent with the Approved Project.

# 4 Planning and statutory framework

GTPL seeks to modify MP08\_0236, as described in Section 3.1, under Section 75W of the EP&A Act.

## 4.1 Environmental Planning and Assessment Act 1979

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Part 3A was repealed by the *Environmental Planning and Assessment Amendment (Part 3A Repeal) Act 2011* (Part 3A Repeal Act) which commenced on 1 October 2011. Under the Part 3A Repeal Act, projects deemed to be 'transitional Part 3A projects' will continue to be subject to Part 3A of the EP&A Act (as in force immediately before the repeal and as modified by the Part 3A Repeal Act).

Transitional Part 3A projects include certain projects that were the subject of an existing approval under Part 3A. As the Project has a Project Approval that was granted under Part 3A of the EP&A Act, it is understood to be a transitional Part 3A project. The provisions of Part 3A (as in force immediately prior to its repeal) continue to be applicable to the proposed modifications.

Section 75W of the EP&A Act enables the Minister to modify a project approval granted under Part 3A of the EP&A Act. In determining whether changes to a Part 3A project can be modified under Section 75W of the EP&A Act, consideration is given to the proposed modifications and any possible change in potential associated environmental impacts.

The proposed modification would result in an additional impact on Aboriginal heritage. Section 5 provides an assessment of likely environmental impacts. However with the implementation of the management measures identified in Section 5 the proposed modification is not predicted to result in significant environmental impact beyond the existing Approved Project.

## 4.2 Environment Protection and Biodiversity Conservation Act 1999

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The Googong Township water cycle project was referred to the Department of Sustainability Environment Water Populations and Communities (DSEWP&C) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) due to potential impacts on matters of national environmental significance, including migratory species, threatened species and communities. The Googong Township project (including water cycle infrastructure) was declared a controlled action under the EPBC Act, and subsequently approved on 19 May 2011, subject to conditions.

The proposed modification would not have any additional impacts on any matters of national environmental significance, and would not result in an inability to meet any EPBC Act conditions of approval. No additional impacts on ecology are expected as a result of the modification. Section 5 provides a detailed assessment of likely environmental impacts.

# 5 Environmental assessment

## 5.1 Overview

This section describes the change in potential impacts of the proposed modification (as detailed in Section 3.1). It recommends, where required, mitigation measures to manage potential impacts.

The potential environmental impacts were identified through an assessment of consistency against the Approved Project. The proposed modification would result in additional impacts on Aboriginal heritage. The proposed modification would not result in environmental impacts on any other aspect of the environment. Accordingly, this environmental assessment only considers changes in Aboriginal heritage impacts.

## 5.2 Aboriginal heritage

### Introduction

Aboriginal heritage sites identified in the environmental assessment are described in Table 2 and their locations indicated on Figure 1. Each site has been classified as low, moderate or high significance, at a local and regional level, based on significance criteria outlined in the environmental assessment.

**Table 2** Summary of Aboriginal heritage sites

Site ID	Description	Local significance	Regional significance
GA7	Artefact scatter	Low-moderate	Low
GA27	Isolated find	Low-moderate	Low
GWTP1	Artefact scatter	Low	Low
GWTP2	Artefact scatter	Low	Low
GWTP3	Artefact scatter	Low	Low
GWTP4	Isolated find	Low	Low

The environmental assessment identified that site GWTP2 may be affected by the construction of the water recycling plant but that the location of the site would be noted in relation to the design of the water recycling plant and that all measures would be taken to avoid the site during construction.

### Impact assessment

The detailed design has identified the encroachment of the water recycling plant footprint into the site GWTP2. Site GWTP2 comprises six artefacts. The artefacts are volcanic cobbles and a brown silcrete flake. The site was assessed by Navin Officer Heritage Consultants (NOHC) as having low archaeological significance both in local and regional contexts. The low archaeological significance rating was determined by the fact that the artefact type and materials are common in the areas and the location was generally disturbed.

### **Proposed mitigation**

GTPL propose to salvage all surface artefacts at site GWTP2 prior to impact. NOHC have prepared a salvage methodology (provided in Appendix A) which includes the following steps:

- A surface inspection would be undertaken at the location with the aim of re-finding each previously identified artefact and any other artefacts.
- Artefact locations would be logged using a GPS and a detailed map of the location of each artefact would be compiled.
- Each artefact would be collected and bagged, each bag to be labelled with permanent marker identifying the site and location.
- Artefacts recovered would be included in the 'Back to Country' protocol, developed for the Googong Township project.

Salvage of surface artefacts would be carried out with the representatives of the registered Aboriginal parties (RAPs).

# 6 Consultation

GTPL has consulted with registered Aboriginal parties and the Office of Environment and Heritage (OEH) during preparation of this modification assessment.

Registered Aboriginal parties and OEH were provided the opportunity to comment on the proposed impacts and salvage methodology. Registered Aboriginal parties were advised of the proposed change in impact via telephone (if available). All registered Aboriginal parties, including those not contactable by telephone, were provided a report detailing the proposed impacts and mitigation and were given the opportunity to provide comment.

Evidence of consultation undertaken as part of this modification assessment is provided in Appendix B (registered Aboriginal stakeholders) and OEH (Appendix C).

**Table 3**

Stakeholder	Summary of submission	Response and report reference
Registered Aboriginal parties	<ul style="list-style-type: none"> <li>King Brown Tribal Group – no objection to the proposed salvage methodology (verbal response).</li> </ul>	Noted. Refer to Appendix B.3.
	<ul style="list-style-type: none"> <li>Ngambri Local Aboriginal Land Council - no objection to the proposal (written response, attached –B.3).</li> </ul>	Noted. Refer to Appendix B.4.
	<ul style="list-style-type: none"> <li>Buru Ngunawal Aboriginal Corporation – responded with a request for more extensive salvage (written response, attached – B.4).</li> </ul>	<p>GTPL provided a written response provided to Buru Ngunawal Aboriginal Corporation indicating that GTPL believe that based on the archaeological properties of the site, more extensive salvage is not warranted. This approach was developed in consultation with NOHC and OEH.</p> <p>Refer to Appendix B.5 for a copy of GTPL’s response to Buru Ngunawal Aboriginal Corporation.</p>
OEH	<p>OEH is satisfied that the proposed salvage methodology and consultation with registered Aboriginal parties is appropriate to mitigate the impacts to Aboriginal heritage site GWTP2.</p> <p>OEH requested that the Aboriginal site recordings for sites GWTP1 – GETP4 are provided to OEH for registration on the AHIMS Registrar.</p>	<p>Noted. Please also note that NOHC have now provided site cards to OEH for registration on the AHIMS Registrar.</p> <p>AHIMS numbers are as follows:</p> <ul style="list-style-type: none"> <li>GWTP1 – AHIMS # 57-2-0782</li> <li>GWTP2 – AHIMS # 57-2-0783</li> <li>GWTP3 – AHIMS # 57-2-0784</li> <li>GWTP4 – AHIMS # 57-2-0785</li> </ul> <p>Refer to Appendix C for correspondence from OEH.</p>

# 7 Conclusion

The water recycling plant detailed design phase has indicated that impacts on Aboriginal heritage site GWTP2 cannot be avoided. While the proposed modification is generally consistent with the objectives and functions of the Approved Project, the impact on this Aboriginal site was not identified in the environmental assessment, and is inconsistent with the Project Approval conditions of approval. The impacts upon this Aboriginal site would be mitigated by their salvage in accordance with the methodology that has been developed in consultation with OEH and registered Aboriginal parties.

GTPL seeks approval from the Minister for Planning and Infrastructure to modify MP08\_0236 under Section 75W of the EP&A Act.

GTPL propose that condition of approval (CoA) C4 is modified as follows:

*The Proponent salvage, through surface collection, identified artefacts at site GWTP2 prior to the commencement of construction at that site. Salvage should be carried out in accordance with the salvage methodology developed in consultation with OEH and registered Aboriginal parties. The Proponent shall not impact any other item of Aboriginal or non-indigenous heritage significance identified in the EA.*



# Appendix A    Aboriginal heritage salvage methodology

# METHODOLOGY

## GOOGONG TOWNSHIP TRUNK WATER AND RECYCLED WATER SYSTEM

*Navin Officer Heritage Consultants Pty Ltd*

*October 2012*

### Purpose of this Document

The purpose of this document is to provide to Aboriginal parties, for review and comment, a proposed methodology for the surface salvage of an Aboriginal site GWTP2 within the Googong Township Integrated Water Cycle project.

Aboriginal parties are invited to provide comments and suggestions back to NOHC by Monday 19 November 2012.

NOHC contact information is as follows:

The Secretary  
Navin Officer Heritage  
Consultants Pty Ltd  
4/71 Leichhardt Street  
Kingston ACT 2604

*email:* [navinofficer@nohc.com.au](mailto:navinofficer@nohc.com.au)

*phone:* 02 62829415

*fax:* 02 62829416

### Background

The Googong Township Water Cycle project is required to provide the essential water and wastewater services for the Googong Township.

As part of the water cycle project, a new Water Recycling Plant will be constructed to treat sewage from the Googong township to a standard suitable for non-potable urban re-use and discharge to the environment. The plant will utilise physical removal, biological and chemical treatment and disinfection to meet these standards, and membrane bioreactor technology at the core of the treatment process.

Treated effluent from the plant would primarily be used for the recycled water system. When recycled water availability exceeds demand, excess water would be discharged into the stormwater management system.

### Legislative Approval and Requirements

The proposed Googong Township water cycle project has been assessed and approved under part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A ACT).

The part 3A approval for the project does not allow for any impact to Aboriginal sites, however since approval it was discovered that one Aboriginal site will be impacted by the project and a modification to the approval is being sought from the Department of Planning and Infrastructure.

### Cultural Heritage Assessment

The Googong Township Water Cycle project study area has been subject to several cultural heritage surveys and assessment (Navin Officer Heritage Consultants [NOHC] 2003, 2008 and 2009).

A program of surface salvage has been undertaken for the Googong Township project (NOHC 2012). The collection methodology outlined below is in keeping with all previous salvage works for the Googong Township project.

One site will be impacted by the Googong Township water cycle project. Site GWTP2 will be impacted by construction and operation of the water recycle plant.

This site was assessed as having low archaeological significance.

In 2009 it was recommended that if impacts are not avoidable, any visible Aboriginal artefacts at the site should be re-positioned away from areas of potential impact.

It is proposed to salvage all surface artefacts at this site instead of relocating them. This is in keeping with all previous salvage works for the Googong Township project.

### **Scope of the program**

The program comprises salvaging artefacts associated with site GWTP2 prior to any ground disturbance.

### **Artefact Salvage**

A surface inspection will be undertaken at the location with the aim of re-finding each previously identified artefact and any other artefacts.

Artefact locations will be logged using a GPS and a detailed map of the location of each artefact will be compiled. Each artefact will then be collected and bagged, each bag will be labelled with permanent marker identifying the site and location.

## References

- Navin Officer Heritage Consultants (NOHC) 2003 Googong Local Environmental Study. Cultural Heritage Component. Report to Willana Associates Pty Ltd.
- Navin Officer Heritage Consultants (NOHC) 2008 Googong New Town Development. An Cultural Heritage Review, Neighbourhood 1. Report to Canberra Investment Corporation.
- Navin Officer Heritage Consultants (NOHC) 2009 Googong New Town Trunk Water and Recycled Water System. Aboriginal and Historical Archaeological Assessment. Report to Canberra Investment Corporation.
- Navin Officer Heritage Consultants (NOHC) 2012 Googong Neighbourhood 1A. Surface Salvage Collection of Aboriginal Objects. Report to CIC Australia.

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## Appendix B Consultation with registered Aboriginal parties

## B.1 Summary of consultation with registered Aboriginal parties

A summary of consultation carried out with registered Aboriginal parties (RAPs) during preparation of the modification request is provided below.

Date	Summary of consultation undertaken
25/10/2012	Proposal letters sent by registered post to RAPs (Refer attached – Appendix B.2).
29/10/2012 – 2/11/2012	Follow up phone calls to advise RAPs of correspondence.
5/1/2012 – 16/11/2012	Deliver receipts received from: <ul style="list-style-type: none"> <li>• Buru Ngunawal Aboriginal Corporation.</li> <li>• King Brown Trinal Group.</li> <li>• Ngarigo Currawong Clan.</li> <li>• Ngambri Local Aboriginal Land Council.</li> <li>• Yurwang Gunada Consultancy Heritage Services.</li> </ul>
19/11/2012 – 23/11/2012	Proposal letters returned to sender from: <ul style="list-style-type: none"> <li>• Little Gudgenby River Tribal Council</li> <li>• (Yukembruk Merung) Ngarigo Consultancy Pty Ltd</li> </ul>
26/11/2012 - 30/11/2012	Follow up phone calls to chase comments on correspondence (due 22 November 2012). Letters resent upon request to: <ul style="list-style-type: none"> <li>• Buru Ngunawal Aboriginal Corporation.</li> <li>• Ngarigo Currawong Clan.</li> <li>• Little Gudgenby River Tribal Council.</li> <li>• Ngambri Local Aboriginal Land Council.</li> </ul>
30/11/2012 –	Cut off date for comments extended to 9 December 2012 out of concern that a number of groups either did not receive the proposal, or could not remember reviewing the proposal.
3/12/2012 - 7/12/2012	Response letters received from Buru Ngunawal Aboriginal Corporation and Ngambri Local Aboriginal Land Council.
Early Dec 2012	Comments received from: <ul style="list-style-type: none"> <li>• King Brown Tribal Group – no objection to the proposed salvage methodology (verbal response).</li> <li>• Ngambri Local Aboriginal Land Council - no objection to the proposal (written response, attached – Appendix B.3).</li> <li>• Buru Ngunawal Aboriginal Corporation - responded that they believe the proposed methodology to be inadequate and requested a more extensive salvage (written response, attached – Appendix B.4).</li> </ul>
21/12/2012	Response to submission letter sent to Buru Ngunawal Aboriginal Corporation to advise them that considering the archaeological potential of the site, no change would be made to the proposal but that their response would be included in the submission (letter attached – Appendix B.5).
8/1/2013	Phone follow up to Buru Ngunawal Aboriginal Corporation confirming receipt of response to submission and next steps in the assessment. Buru Ngunawal Aboriginal Corporation confirmed that they understood GTPL's position and raised no further comments.

## B.2 Correspondence sent from GTPL to RAPs seeking comments on proposed impacts to GWTP2

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manidis roberts Pty Ltd  
abn 42 003 550 972  
level 9, 17 York Street, Sydney NSW 2000  
gpo box 91, Sydney NSW 2001  
t 02 9248 9800 f 02 9248 9810  
www.manidisroberts.com.au

Mr Wally Bell  
Buru Ngunawal Aboriginal Corporation  
PO Box 6900  
Charnwood ACT 2615

25 October 2012

Our reference: 11096

Dear Wally,

### **Googong Township water cycle project GWTP2 Heritage salvage methodology**

The purpose of this letter is to invite Buru Ngunawal Aboriginal Corporation to review and make comment on a proposal to salvage surface artefacts from an Aboriginal site located within the footprint of the Googong Township water cycle project.

The Googong Township water cycle project is required to provide the essential water and wastewater services for the Googong Township development. Manidis Roberts have been engaged by Googong Township Pty Ltd (GTPL) to manage the environmental impacts throughout the project development phase. Manidis Roberts have been working with Navin Officer Heritage Consultants for impacts relating to heritage.

In 2010, the Googong Township water cycle project environmental assessment identified six Aboriginal heritage sites in close proximity to the project. At that stage, possible impacts on one site, GWTP2 (an artefact scatter) were identified due to its location adjacent to the proposed water recycling plant. The site was assessed as having low local significance.

Since completion of the environmental assessment, GTPL have carried out further detailed design of the water recycling plant. It has been identified that the plant design cannot avoid impacts on site GWTP2 due operational and access requirements. Refer to Attachment 1 for the location of site GWTP2 relative to the water recycling plant.

It is proposed to salvage all surface artefacts at this site.

The methodology for the proposed salvage of surface artefacts at site GWTP2 has been provided as an attachment to this letter for your review (Attachment 2). Buru Ngunawal Aboriginal Corporation is invited to provide comments on the proposed salvage by Thursday 22 November 2012.

Feedback can be provided either by phone or in writing to the following contacts:

11096L 2012-10-24 GWTP2SM\_BURU.DOCX

The logo for Manidis Roberts, featuring the company name in a stylized, handwritten-style script.



Mail: The Secretary  
Navin Officer Heritage Consultants Pty Ltd  
4/71 Leichhardt Street  
Kingston ACT 2604  
Email: [navinofficer@nohc.com.au](mailto:navinofficer@nohc.com.au)  
Phone: 02 6282 9415  
Fax: 02 6282 9416

If you have any queries regarding the salvage methodology, please contact Nicola Hayes of Navin Officer Heritage Consultants on 02 6282 9415, or via email at [navinofficer@nohc.com.au](mailto:navinofficer@nohc.com.au). If you have any queries regarding the Googong Township water cycle project, please contact Michael Lloyd of Manidis Roberts on 0423 462 690, or via email at [mlloyd@manidisroberts.com.au](mailto:mlloyd@manidisroberts.com.au).

Yours faithfully,  
**Manidis Roberts**



**Michael Lloyd**  
Senior consultant

## B.3 Ngambri Local Aboriginal Land Council response



Ngambri Local Aboriginal Land Council  
PO Box 150 Queanbeyan,  
NSW 2620

ABN 95902355609

P 02 6297 4152  
F 02 6299 3941  
E nlaic1@bigpond.net.au

6 December 2012

The Secretary  
Navin Officer Heritage  
Consultants Pty Ltd  
4/71 Leichhardt Street  
Kingston ACT 2604

**RE: GOOGONG TOWNSHIP Methodology  
TRUNK WATER AND RECYCLED WATER SYSTEM**

Dear, Michael

Ngambri Local Aboriginal Land Council concurs with the report and identifies the issues highlighted in the report below:

- AHIP applications be generated for the sites that may be impacted upon, identified in the current heritage assessment and methodology i.e. partial scatters, etc... undertake salvage for relocation into a more suitable location e.g. conservation area within the local area

Should you require any more information please contact me on 6297-4152.

Yours Sincerely

Colin Williams  
Chief Executive Officer  
Ngambri Local Aboriginal Land Council

## B.4 Buru Ngunawal Aboriginal Corporation response

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ABN : 24 059 704 833

9 December 2012

Navin Officer Heritage Consultants  
Number 4, Kingston Warehouse  
71 Leichhardt Street  
KINGSTON ACT 2604

### Googong Aboriginal Site GWTP2- Salvage Methodology

On behalf of the Buru Ngunawal Aboriginal Corporation (BNAC) we would like to express our appreciation for the consultation on the Site GWTP2 as an interested party for all Aboriginal Cultural Heritage concerns within our designated ancestral area.

As we continually state, any planned work to be undertaken in the area that lies within our tribal boundaries will impact on our cultural heritage and therefore, we would appreciate that the proper protocol of advising and consulting with us be provided.

The Traditional Custodians must be involved in the entire process otherwise it is nothing but a tokenistic, tick the box gesture to meet legislative requirements.

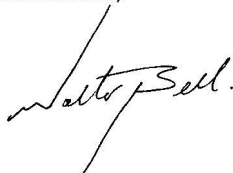
BNAC representatives have attended the Googong site on numerous occasions for the proposed Googong New Town project since approximately 2002.

The requirement to undertake this salvage is due to the area containing site GWTP2 now being impacted by a new Water Recycling Plant that will be constructed in the proposed development area of the Googong New Town residential development currently under construction. BNAC have read the proposed methodology and consider that the collection of surface artefacts only is inadequate. BNAC propose that the salvage be carried out in two phases, 1: Collection of surface artefacts 2: grader scrape to investigate the depth of the deposit and collect any further artefacts that may be uncovered. BNAC make this request as surface artefacts are on indication that there is a potential for other artefacts to be present subsurface which has been proven on numerous occasions in the past. The site may be rated from a scientific viewpoint to be of low archaeological significance, but to BNAC it still holds a spiritual and ancestral connection to country.

As the site now falls within the construction area of the project BNAC are willing to participate in the surface salvage at site GWTP2 as part of the development in the proposed manner indicated above and wish to confirm our support for the proposed Return to Country of the artefacts at completion of the works.

Thank you for our continued involvement in the preservation and conservation of our cultural heritage.

Yours faithfully



Wally Bell (Ngunawal TC)  
Director/Chair

## B.5 GTPL's response to Buru Ngunawal Aboriginal Corporation

manidis roberts Pty Ltd  
abn 42 003 550 972  
level 9, 17 York Street, Sydney NSW 2000  
gpo box 91, Sydney NSW 2001  
t 02 9248 9800 f 02 9248 9810  
www.manidisroberts.com.au

Mr Wally Bell  
Buru Ngunawal Aboriginal Corporation  
PO Box 6900  
Charnwood ACT 2615

21 December 2012

Our reference: 11096

Dear Wally,

**Googong Township water cycle project  
GWTP2 Heritage salvage methodology - response**

Thank you for your response to the proposed heritage salvage methodology for site GWTP2 associated with the Googong Township water cycle project.

Manidis Roberts have evaluated the suitability of your request for additional sub-surface salvage measures. This evaluation has been conducted in consultation with Navin Officer Heritage Consultants (NOHC) and the Office of Environment and Heritage (OEH). It is considered that the salvage methodology proposed in our correspondence of 25 October 2012 is adequate, in that it is consistent with the previous salvage methodologies for similar sites. As a result, Manidis Roberts and NOHC do not propose to amend the salvage methodology for site GWTP2.

While we acknowledge that in many cases the existence of surface artefacts can be an indication of the potential for the presence of other subsurface artefacts, at this particular site the archaeological subsurface potential has been assessed by NOHC as being low. This assessment has been made in light of both the original on-site assessment in which Buru Ngunawal Aboriginal Corporation was involved, and the results of subsurface testing and salvage programs at similar sites within the adjacent Googong Neighbourhood 1A development. The decision not to modify the proposed salvage methodology has therefore been made in recognition of the low potential for subsurface artefacts, and in the interest of ensuring a consistent approach to the management of heritage impacts across the Googong Township development and water cycle project.

Googong Township Pty Ltd will now submit a request to modify the Googong Township water cycle project to the Minister for Planning and Infrastructure. Specifically this modification will seek approval from the Minister for the impact to and surface salvage of artefacts at site GWTP2. Your response to the proposal will form part of GTPL's request to the Minister, in order that it may be given due consideration during the Department of Planning and Infrastructure's assessment of the modification request.

Thank you for your continued involvement and contributions to the management of heritage impacts on this project. We would welcome your involvement in the surface salvage and are grateful for your support of the 'Back to Country' protocol developed for the Googong Township project.

11096L 2012-12-21 BNRES.DOCX



We will advise you of the outcome of the Department of Planning and Infrastructure's assessment and be in contact prior to any salvage being undertaken at site GWTP2.

Yours faithfully,  
**Manidis Roberts**

A handwritten signature in blue ink, appearing to read 'ML', with a long horizontal flourish extending to the right.

**Michael Lloyd**  
*Senior Consultant*

## Appendix C Consultation with OEH

## Appendix C Consultation with OEH





Office of  
Environment  
& Heritage

Your reference  
Our reference  
Contact

11096  
DOC13/3885  
Jackie Taylor (02) 6229 7089

Chontelle Perucich  
Senior Consultant  
Manidis Roberts Pty Ltd  
GPO Box 91  
SYDNEY NSW 2001

Dear Ms Perucich,

**RE: Googong Water Cycle Project: Proposed impacts to Aboriginal heritage site GWTP2**

Thank you for your letter dated 23 January 2013 seeking comments from the Office of Environment and Heritage (OEH) in relation to impacts now proposed to Aboriginal heritage site GWTP2 as part of the Googong Water Cycle Project.

The OEH has reviewed the letter and consultation summary prepared by Manidis Roberts (dated 23 January 2013), the salvage methodology prepared by Navin Officer Heritage Consultants (dated October 2012), the responses from the Registered Aboriginal Parties (dated 6 December and 9 December 2012) and the consultation response prepared by Manidis Roberts (dated 21 December 2012).

On the basis of the documents provided OEH is satisfied that, given the nature of the site and the results of previous archaeological investigations undertaken in the surrounding area, the proposed salvage methodology and consultation undertaken to date is appropriate to mitigate impacts to Aboriginal heritage site GWTP2. OEH notes that the proposed salvage methodology and relocation of artefacts is consistent with the conditions of an Aboriginal Heritage Impact Permit (AHIP) previously issued by OEH for the adjacent Googong New Town Neighbourhood 1A development.

OEH supports the commitment of the proponent to continue to consult with the Registered Aboriginal Parties and to also provide opportunities for Registered Aboriginal Parties to be involved in the proposed salvage of Aboriginal heritage site GWTP2 through surface collection.


OEH is concerned however that, although the Aboriginal and Historical Archaeological Assessment for the Googong Water Cycle Project is dated October 2009, no Aboriginal Site recordings are listed on the Aboriginal Heritage Information Management System (AHIMS) for the corresponding sites GWTP1, GWTP2, GWTP3 or GWTP4. As such, OEH requests that Aboriginal Site Recording Forms for these sites be submitted to the AHIMS Registrar as a matter of urgency. Notification of Aboriginal site recordings, in the form of an OEH Aboriginal Site Recording Form, is a requirement under section 89A of the *National Parks and Wildlife Act 1974* which is not turned off by a Part 3A Major Project Approval under the *Environmental Planning and Assessment Act 1979*. Data from these site recordings also contributes to the body of knowledge about site distribution patterns associated with Aboriginal use of the Googong area.

If required, copies of the Aboriginal Site Recording Forms can be found on OEH website at:  
[http://www.environment.nsw.gov.au/resources/parks/SiteCardMainV1\\_1.pdf](http://www.environment.nsw.gov.au/resources/parks/SiteCardMainV1_1.pdf).

There is a new guide on the OEH website that may assist with completing the Aboriginal Site Recording Forms:  
<http://www.environment.nsw.gov.au/resources/parks/20121008SiteRecordGuide.pdf>

OEH is happy to discuss any of the comments above further with you, or the Department of Planning and Infrastructure, if required. If you have any questions on the above, please contact me on (02) 6229 7089.

Yours sincerely

 06/02/2013

**JACKIE TAYLOR**  
**Acting Manager Landscape & Aboriginal Heritage Protection (South)**  
**Regional Operations Group**