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# 1. General

## 1.1 Introduction

Northrop Consulting Engineers Pty Ltd (Northrop) have been engaged by Hansen Yuncken to prepare the Civil Engineering design and documentation in support of a Construction Certificate for the New Jindabyne Education campus in 207 Barry Way, Jindabyne.

This report covers the works shown as the Northrop Drawing Package required for the development of the site including:

- Erosion and Sediment control;

## 1.2 Related Reports and Documents

This report is to be read in conjunction with the following reports and documents:

1. Detailed Design Phase Civil Documentation prepared by Northrop:
  - CSK01: Erosion and Sediment Control Plan
  - CSK02: Erosion and Sediment Control Details
2. NSW Department of Housing Manual, "Managing Urban Stormwater Soil & Construction" 2004 (Blue Book)
3. Snowy Monaro Regional Council Engineering Design Guidelines

## 1.3 The Development

### 1.3.1 Precinct and Surrounds

The site is located at 207 Barry Way, Jindabyne, in the local government area of Snowy Monaro Regional Council. The site is formally described as Lot 101 DP1019527.

The site is located on an empty land with some commercial centres nearby. Refer to below screenshot.







The pumped water from the sediment basin can be reused for dust control during construction, refer Section 2.1.1 for Maintenance of the sediment basin.

Overflow weirs are to be provided to control overflows for rainfall events in excess of the design criteria which caters for a storm event up to and including the 1% AEP storm event.

The concept sediment basin sizing is summarised in the table below. Detailed sediment basin sizing, configuration and location shall form part of the Construction Certificate application.

Site	$C_v$	$R_{x\text{-day}, y\text{-}\%ile}$	Total catchment area (ha)	Settling zone volume (m <sup>3</sup> )	Sediment storage volume (m <sup>3</sup> )	Total basin volume (m <sup>3</sup> )
1	0.35	24.4	2.62	223.748	15	238.748
2	0.35	25.1	4	351.4	72	423.4
3	0.35	25.1	0.7	61.495	30	91.495
4	0.35	25.1	1.68	147.588	60	207.588

The sediment basin has been located for future conversion into the permanent water quality and detention devices.

### 2.1.1 Maintenance of Sediment Basin

Prior to any forecast weather event, likely to result in sediment laden runoff on the site, dewatering is to be undertaken to provide sufficient capacity to capture sediment laden water from the site. Any sediment laden water captured on site must be treated to ensure it will achieve Council's water quality objectives prior to its release from site. A sample of the released treated water must be kept on site in a clear container with the sample date recorded.

- No aluminum based products may be used to treat turbid water (flocculating/coagulants) on site without the prior written permission from an appropriate Council Officer. The applicant must have demonstrated ability to use such products correctly and without environmental harm prior to any approval.
- The chemical/ agents (Flocculating/coagulants) used in Type D and Type F Basins to treat turbid water captured in the basin must be applied in concentrations sufficient to achieve Council's water quality objectives (TSS <50mg/L Turbidity <60 NTU 6.5 <ph <8.5) within the 5 day rainfall depth used to calculation the capacity of the basin, after a rainfall event.
- All manufacturers instructions must be followed for the use of any chemicals/agents used on site except where approved by the responsible person or an appropriate Council Officer.
- Sufficient quantities of chemicals/agents to treat turbid water (Flocculating/coagulants) must be placed such that water entering the basin mixes with the chemical/agents and is carried into the basin/trap.
- The sediment basin to be dewatered as soon as practical once water captured in the basin achieves Council's water quality objectives
- Inspect the sediment basin after each rainfall events and/or weekly. Ensure that all the sediment is removed once the sediment storage zone is full. Ensure that outlet and emergency spillway works are maintained in a fully operational condition at all times.

## 2.2 Sediment and Erosion Control Measures

Prior to any earthworks commencing on site, sediment and erosion control measure shall be implemented generally in accordance with the Construction Certificate drawings and the "Blue Book". The measures shown on the drawings are intended to be a minimum treatment only as the contractor

will be required to modify and stage the erosion and sedimentation control measures to suit the construction program, sequencing and techniques. These measures will include:

- A temporary site security/safety fence is to be constructed around the site, the site office area and the proposed sediment basin;
- Sediment fencing provided downstream of disturbed areas, including any topsoil stockpiles;
- Dust control measures including covering stockpiles, installing fence hessian and watering exposed areas;
- Placement of hay bales or mesh and gravel inlet filters around and along proposed catch drains and around stormwater inlets pits within the site;
- The construction of a temporary sediment basin as noted above in Section 2.1;
- Stabilised site access at the construction vehicle entry/exits.

Any stockpiled material, including topsoil, shall be located as far away as possible from any associated natural watercourses or temporary overland flow paths. Sediment fences shall be installed to the downstream side of stockpiles and any embankment formation. All stockpiles and embankment formations shall be stabilised by hydroseeding or hydro mulching on formation.

### **2.3 Wet Weather Management**

In circumstances of heavy rain sufficient to affect site access and ground conditions the Site Manager and Site HSE Committee representative should complete a site inspection before work commences. The inspection needs to focus on;

- The suitability of pedestrian access to the amenities and into the construction work areas
- The suitability of access for plant and equipment
- The suitability of ground conditions for plant and equipment to operate
- Nominate the construction zones suitable for work to commence
- Actions to remediate those areas not suitable for work to commence (de-water; prepare ground conditions and access ways etc.)

### 3. Further Commentary

The Minister for Planning and Open Spaces has provided Conditions of Consent (Application Number: SSD - 15788005) for the New Jindabyne Education Campus. Conditions associated with the Construction Soil and Water Management Plan have been provided below with further commentary for consideration by School Infrastructure NSW and the Certifying Authority.

#### **B19. Construction Soil and Water Management Sub-Plan (CSWMSP)**

**The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMSP) and the plan must address, but not be limited to the following:**

- (a) be prepared by a suitably qualified expert, in consultation with Council;**
- (b) measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;**
- (c) describe all erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom 2004) commonly referred to as the 'Blue Book';**
- (d) provide a plan of how all construction works will be managed in a wet-weather events (i.e. storage of equipment, stabilization of the Site);**
- (e) detail all off-site flows from the site;**

#### **Northrop Commentary**

The following comments have been provided with respect to Condition B1 for consideration by School Infrastructure NSW and the Certifying Authority.

#### **Northrop Commentary**

- (a) The erosion and sediment control plans have been prepared by Stephen Fryer BE(Civil) MIEAust CPEng NER. Please refer to the CV of the designer provided in Appendix. The project design team have forwarded this report to Snowy Monaro Regional Council for their review and comment. Refer Consultation Record in the Appendix.
- (b) Please refer to Section 2 of this report and associated Civil Engineering drawings CSK01 and CSK02. A shaker with wheel wash has been specified at the site egress points to remove loose soils and mud from vehicle wheels prior to leaving site.
- (c) Please refer to Erosion and Sediment Control drawings CSK01 and CSK02.
- (d) Clean water from the Sediment Basins are discharge to the empty space on the lot. Refer Section 2.1.1 for methodology prior to site stormwater during construction.
- (e) Please refer to Section 2 of this report and associated Civil Engineering drawings CSK01 and CSK02. The erosion and sediment control plans have been designed in accordance with the requirements of NSW Department of Housing Manual, "Managing Urban Stormwater Soil & Construction" 2004 (Blue Book).

## Appendix



### Stephen Fryer

Principal | Senior Civil Engineer  
**BE (Civil) MIEAust CPEng NER**

Stephen has over 25 years of professional experience, leading teams to deliver robust civil engineering outcomes for land development and urban infrastructure. His success has stemmed from his proficiency in understanding and bringing together all aspects of urban infrastructure, and the strong relationships he has developed with councils and utility

providers.

Since joining Northrop in 2006, Stephen has played an integral role in building the civil team to pursue technical excellence and deliver practical, bespoke solutions for our clients. He was made an Associate in 2010 and then appointed Principal in 2012.

In his client-centred approach and commitment to adding value, Stephen knows the importance of understanding and managing risk – developing clear solutions that prepare for unforeseen challenges and deliver successful project outcomes for clients. Stephen is the Parramatta Office Leader and heads up the Service Excellence working group for the Sydney region.

### Project Experience

#### Industrial

- Bucher Municipal - Sydney Business Park
- Marsden Park Trade Centre
- Yennora Distribution Centre
- ASICS HQ, Marsden Park
- Lindsay Transport, Erskine Park
- Tigerpak – Sydney Business Park
- Axalta - Sydney Business Park
- DB Schenker, QLD
- Northline, QLD
- Toll Larapinta, QLD
- Gore Hill Business Park

#### Commercial

- Suttons Motors Vehicle Showrooms – Rosebery, Lidcombe, Homebush, Chullora, Mosman, Waitara,
- Holliday Inn Express – Newcastle
- Holliday Inn Express – Macquarie Park

#### Institutional & Educational

- Lismore Hospital
- Bathurst Correctional Centre
- Cessnock Correctional Centre
- The Ponds Public & High School
- Wagga Wagga High School
- Catherine Fields High School

#### Infrastructure

- IC3 West 17 Talavera Road, Macquarie Park

#### Public Domain & Open Spaces

- Wentworth Park Greyhound Track
- Bourke Street Cycleway
- Cooks River Cycleway
- Grand Pacific Walk
- Trench Reserve Boat Ramp – Penrith
- David Phillips Fields – Daceyville
- Charles Street Square – Parramatta
- Wattamolla Beach Reserve and Parking

#### Urban Development

- Le Windsor, Castle Hill
- Fern Creek Road and Orchard Street, Warriewood
- Rosewood Estate, Kellyville
- Sandstone Ridge, Marsden Park
- Seymour Residences – Roseville
- 10 Gilroy Ave Turramurra
- 5 – 15 Lamond Ave Turramurra
- Mirrabell Apartments, Turramurra
- Wagga Wagga Planning Study
- Campbelltown Overland Flow Path Rectification
- Liverpool Catholic Club
- Campsie RSL Expansion





Stephen Fryer  
To ☐ Volker Georgi

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7 MB

221264\_Erosion & Sediment Control Plan.pdf  
3 MB

221264\_Erosion & Sediment Control DETAILS.pdf  
1 MB

 Reply
  Reply All
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Fri 28/10/2022 2:24 PM

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Hi Volker,

Nice to meet with you last week.

I am sending this email regarding Condition B19 of SSD 15788005 which directs consultation with Council regarding the preparation of the erosion and sediment control plan. The condition is as follows:

**B19. The Applicant must prepare a Construction Soil and Water Management Sub-Plan (CSWMSP) and the plan must address, but not be limited to the following:**

- be prepared by a suitably qualified expert, in consultation with Council;
- measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the site;
- describe all erosion and sediment controls to be implemented during construction, including as a minimum, measures in accordance with the publication Managing Urban Stormwater: Soils & Construction (4<sup>th</sup> edition, Landcom 2004) commonly referred to as the Blue Book;
- provide a plan of how all construction works will be managed in a wet-weather event (i.e. storage of equipment, stabilisation of the Site);
- detail all off-site flows from the site; and

Attached is a copy of the proposed erosion and sediment control plan and supporting report.

Feel free to discuss any aspect with me.

Regards

**Stephen Fryer**

**Stephen Tyler**  
Principal | Civil Engineer | Parramatta Office Leader

Northrop Consulting Engineers Pty Ltd

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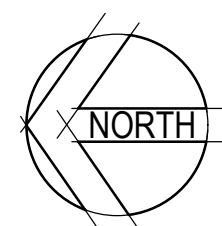
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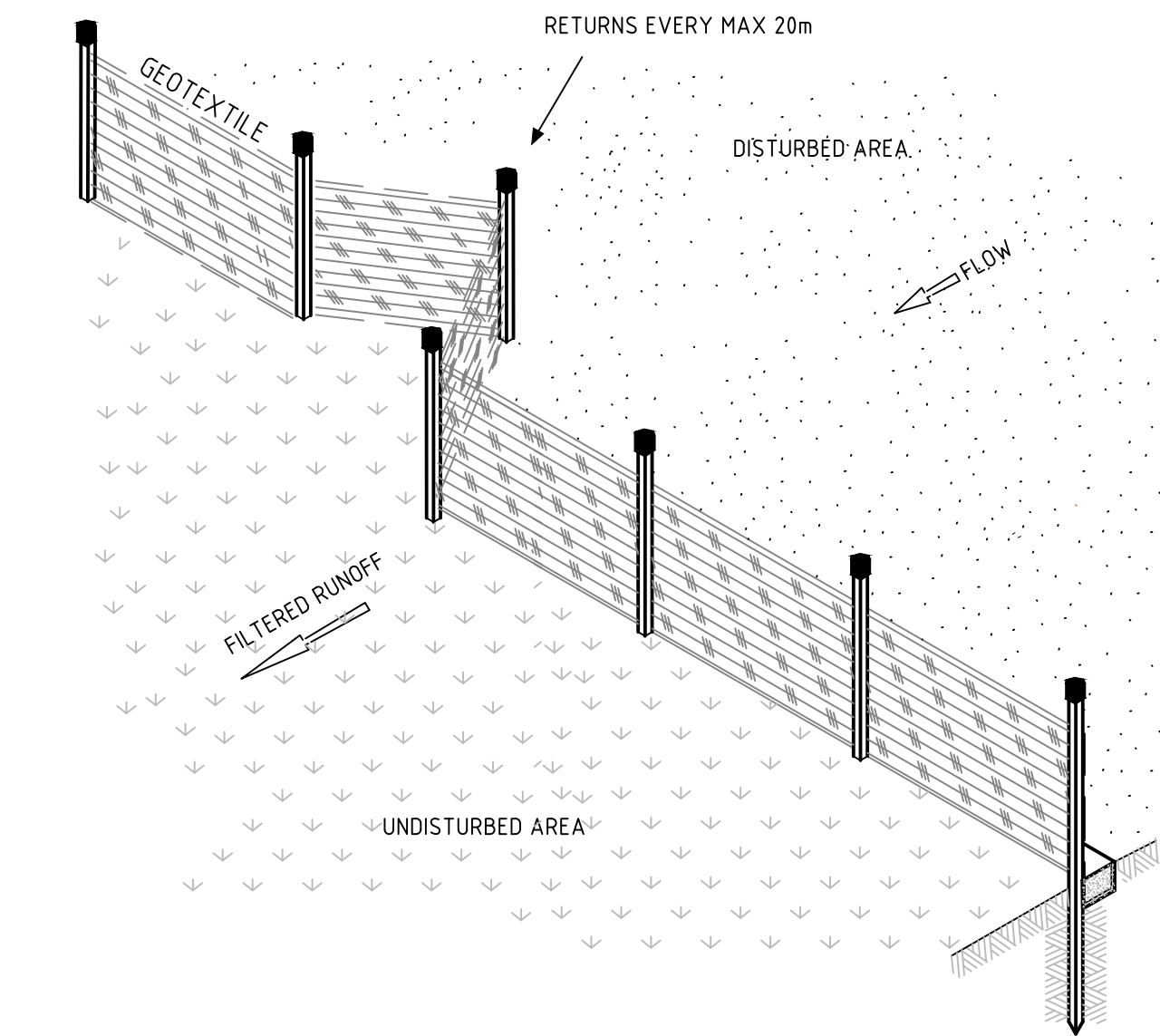




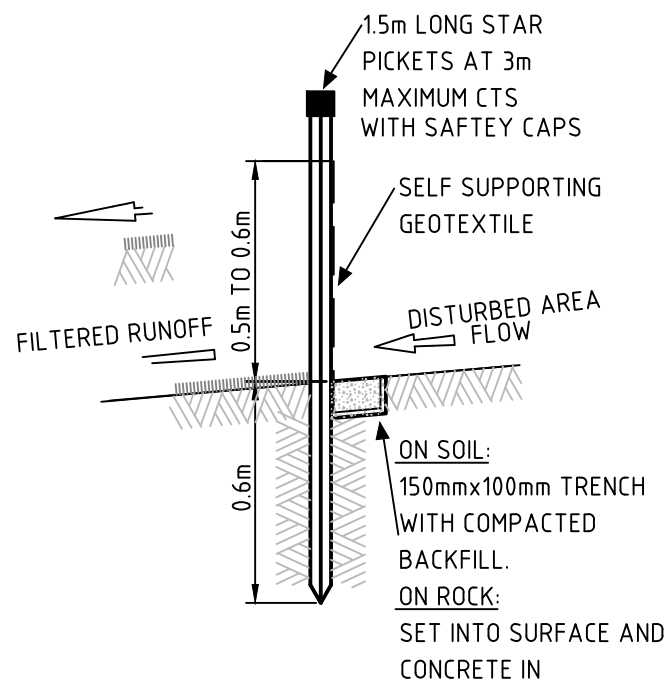
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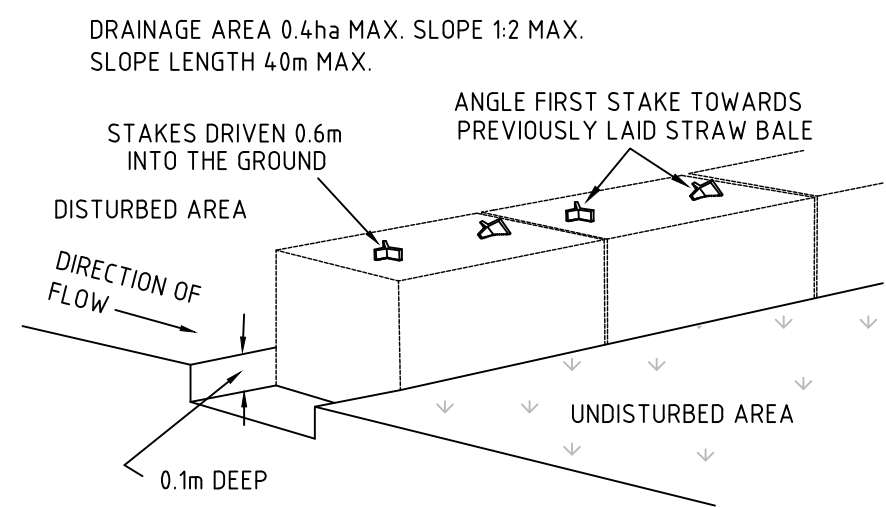
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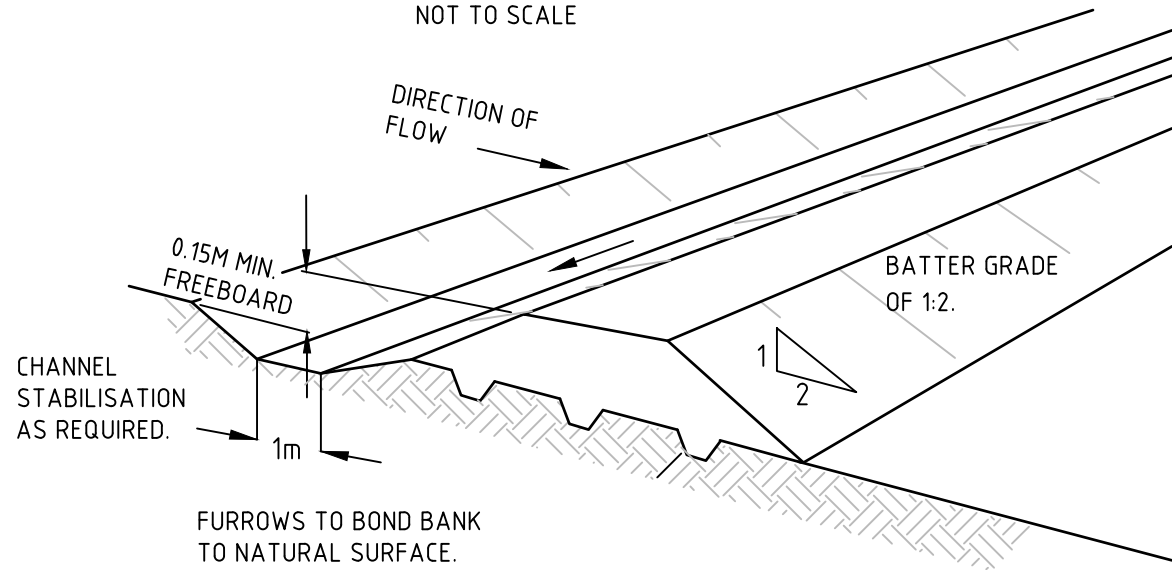
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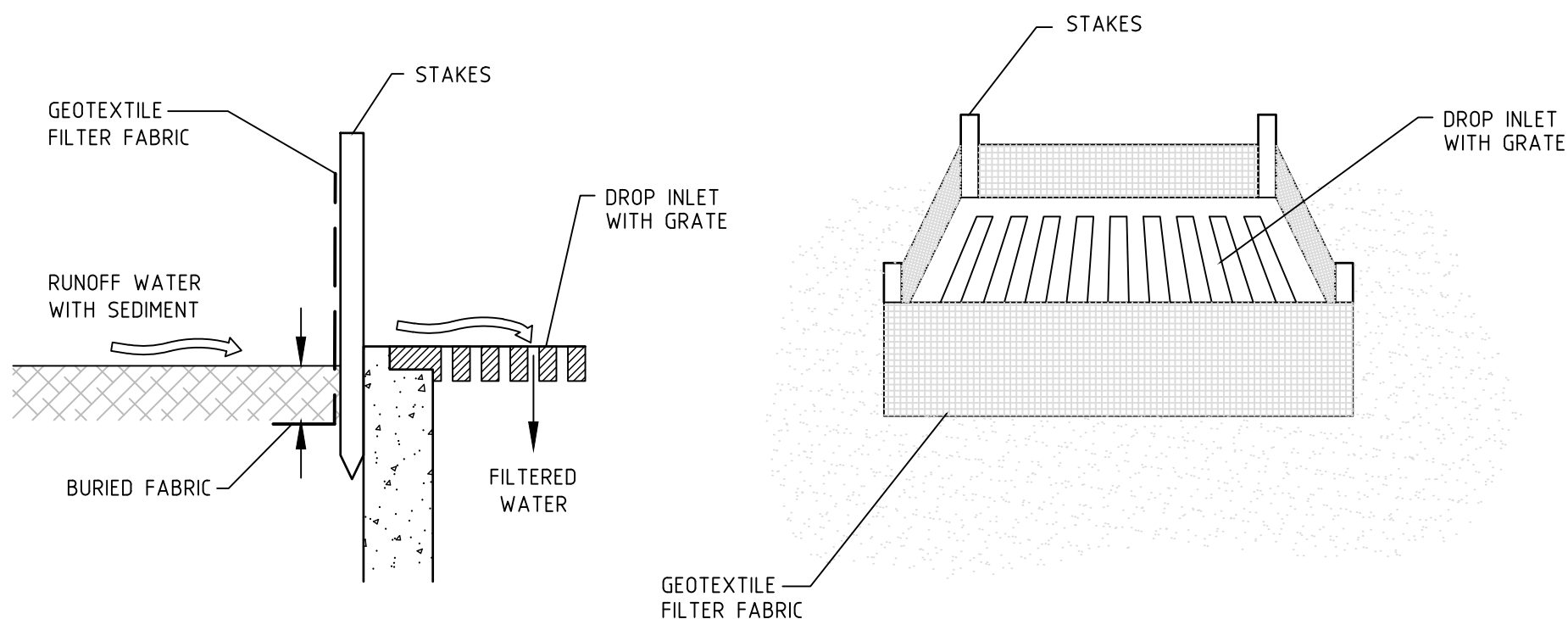
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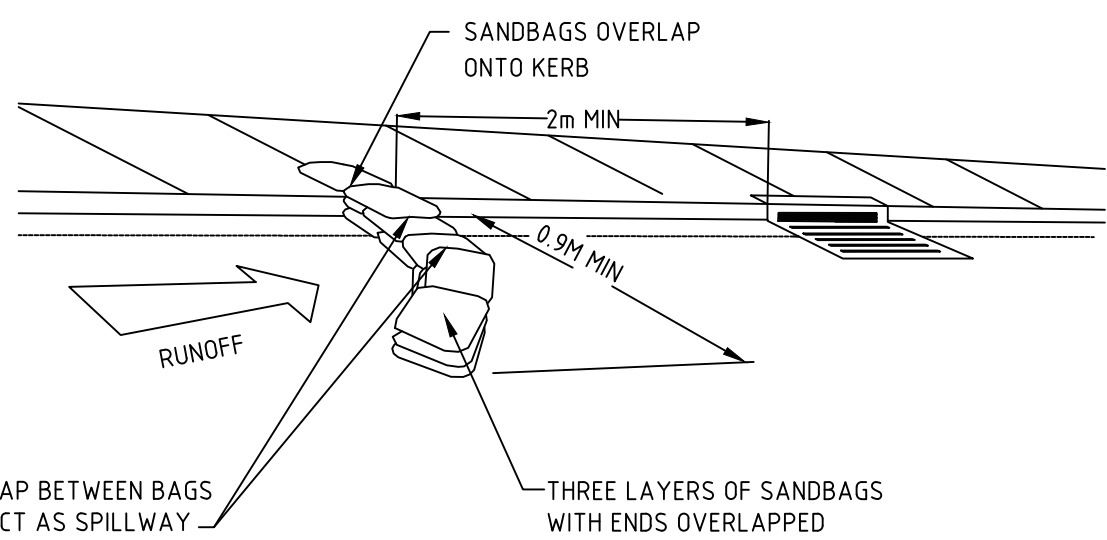
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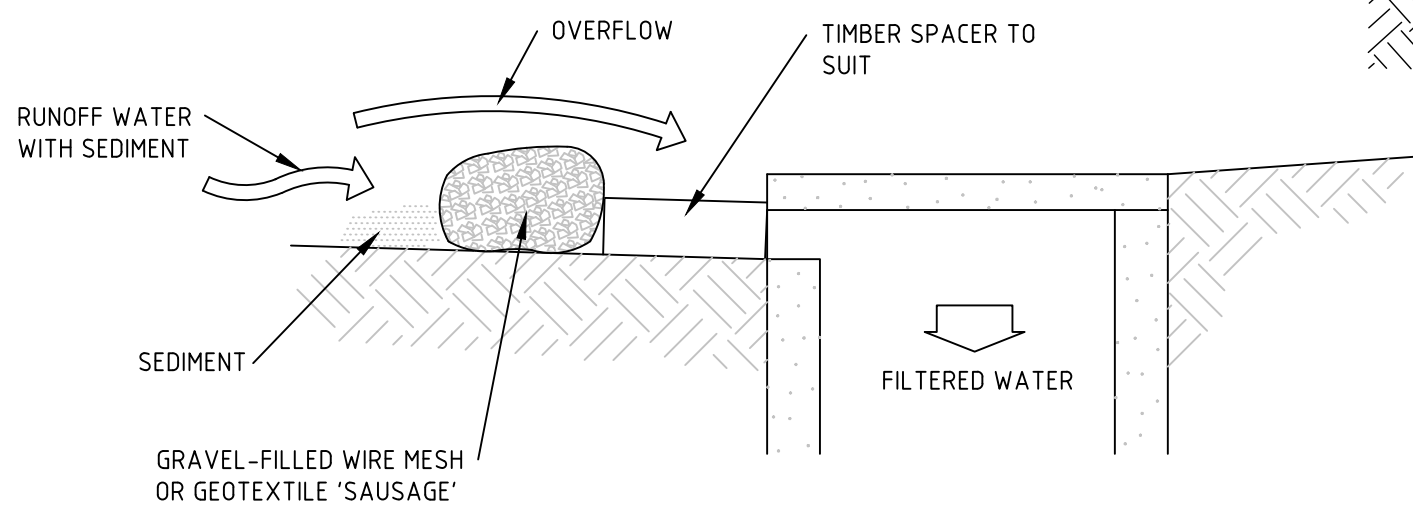
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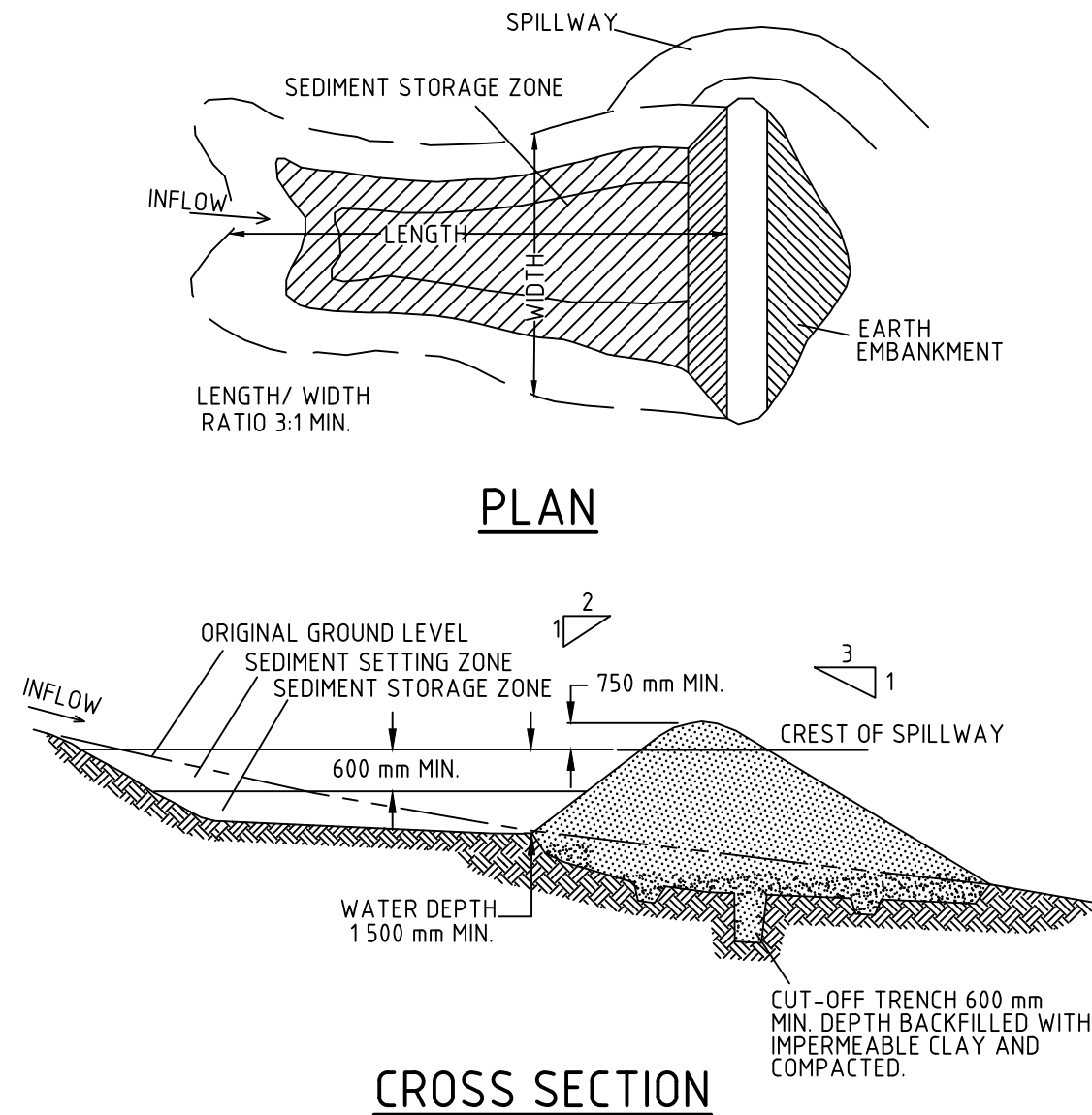
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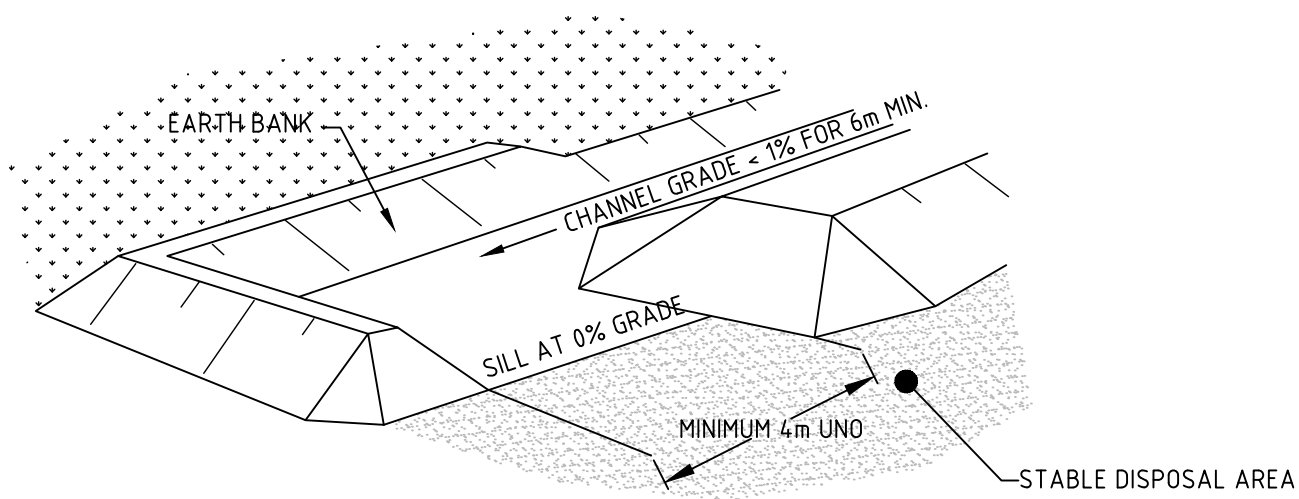


CROSS SECTION

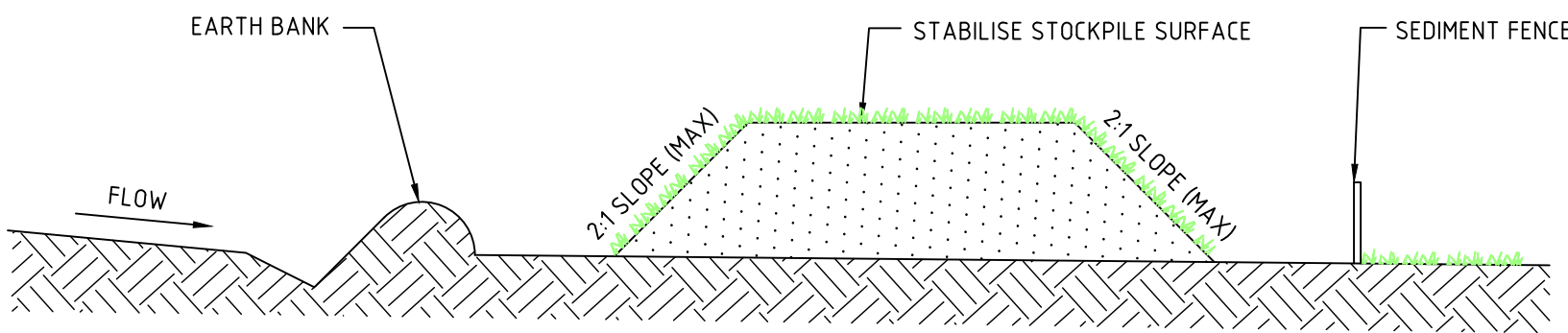
CONSTRUCTION NOTES

1. REMOVE ALL VEGETATION AND TOPSOIL FROM UNDER THE DAM WALL AND FROM WITHIN THE STORAGE AREA.
2. CONSTRUCT A CUT-OFF TRENCH 600 MM DEEP AND 1,200 MM WIDE ALONG THE CENTRELINE OF THE EMBANKMENT EXTENDING TO A POINT ON THE GULLY WALL LEVEL WITH THE RISER CREST.
3. MAINTAIN THE TRENCH FREE OF WATER AND RECOMPACT THE MATERIALS WITH EQUIPMENT AS SPECIFIED IN THE SWMP TO 95 PER CENT STANDARD PROCTOR DENSITY.
4. SELECT FILL FOLLOWING THE SWMP THAT IS FREE OF ROOTS, WOOD, ROCK, LARGE STONE OR FOREIGN MATERIAL.
5. PREPARE THE SITE UNDER THE EMBANKMENT BY RIPPING TO AT LEAST 100 MM TO HELP BOND COMPACTED FILL TO THE EXISTING SUBSTRATE.
6. SPREAD THE FILL IN 100 MM TO 150 MM LAYERS AND COMPACT IT AT OPTIMUM MOISTURE CONTENT FOLLOWING THE SWMP.
7. CONSTRUCT THE EMERGENCY SPILLWAY.
8. REHABILITATE THE STRUCTURE FOLLOWING THE SWMP. (APPLIES TO 'TYPE D' AND 'TYPE F' SOILS ONLY)

EARTH BASIN - WET SD 6-4  
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NTS



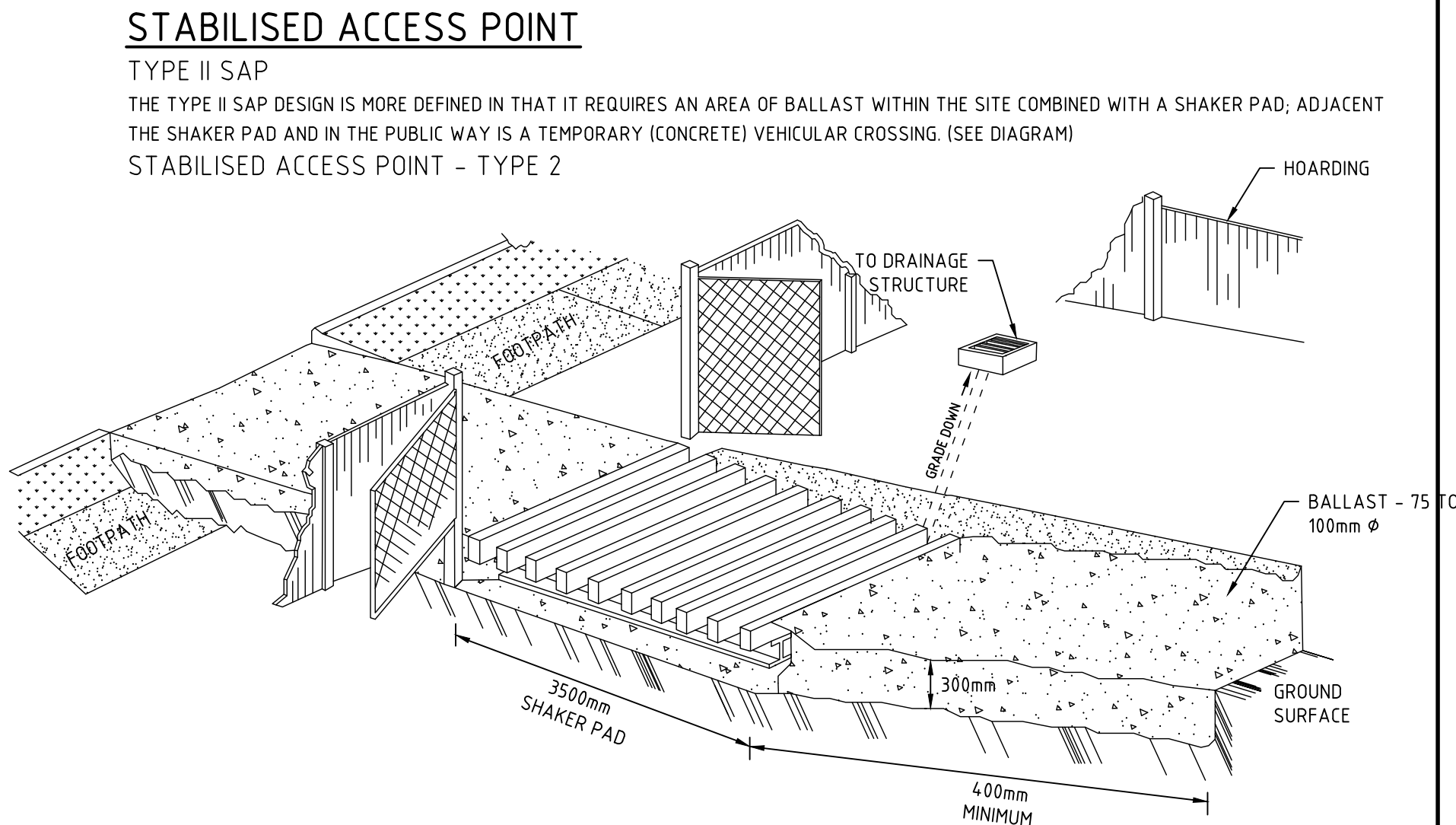
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CONSTRUCTION NOTES:

1. PLACE STOCKPILES MORE THAN 2 (PREFERABLY 5) METRES FROM EXISTING VEGETATION, CONCENTRATED WATER FLOW, ROADS AND HAZARD AREAS.
2. CONSTRUCT ON THE CONTOUR AS LOW, FLAT, ELONGATED MOUNDS
3. WHERE THERE IS SUFFICIENT AREA, TOPSOIL STOCKPILES SHALL BE LESS THAN 2m IN HEIGHT
4. WHERE THERE ARE TO BE IN PLACE FOR MORE THAN 10 DAYS, STABILISE FOLLOWING THE APPROVED ESCP OR SWMP TO REDUCE THE C-FACTOR TO LESS THAN 0.10
5. CONSTRUCT ON THE UPSLOPE SIDE TO DIVERT WATER AROUND STOCKPILES AND SEDIMENT FENCE 1m TO 2m DOWNSLOPE

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IN BOTH TYPE I AND TYPE II SAP'S, THE TEMPORARY VEHICULAR CROSSING MUST:

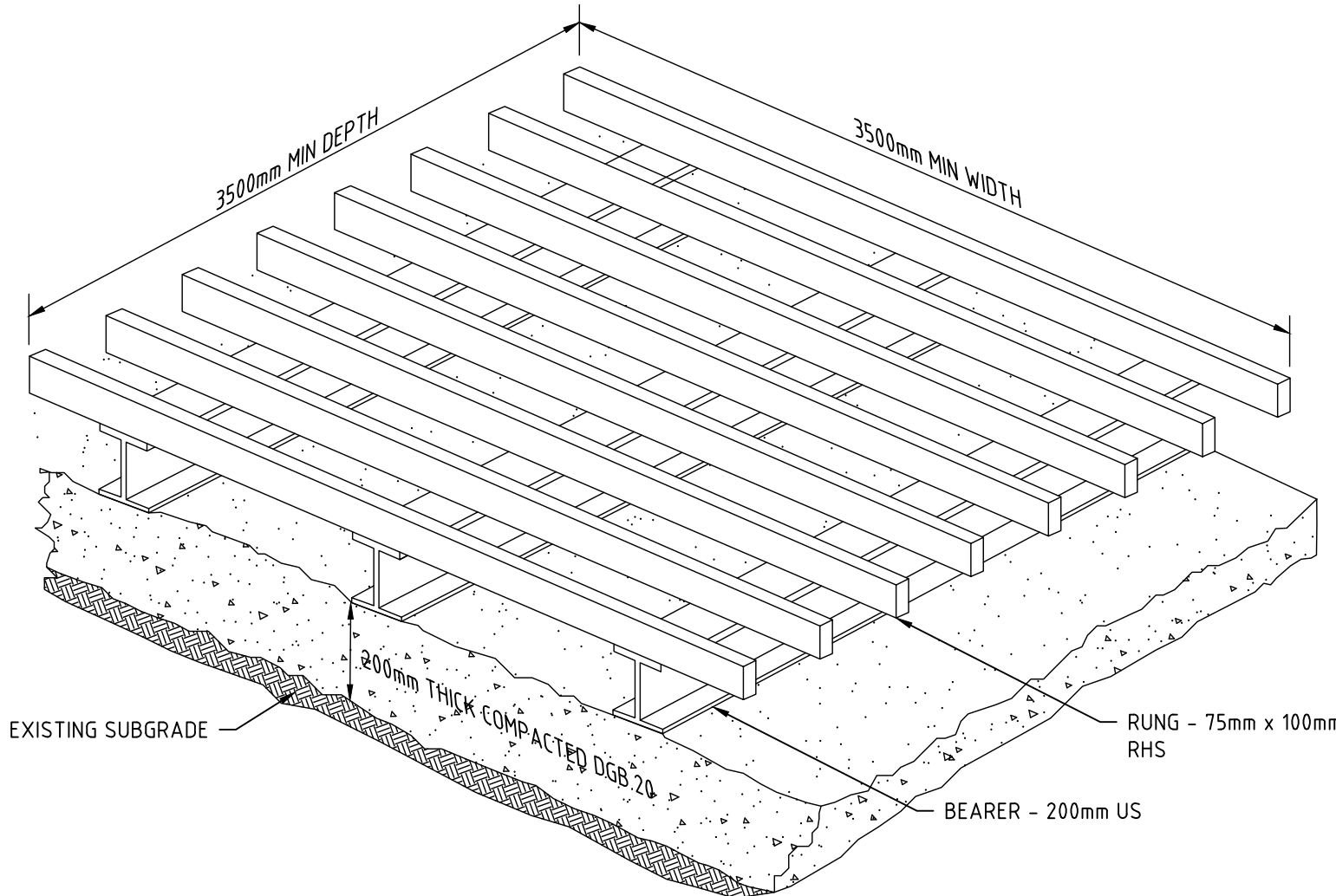
- CONNECT TO AN EXISTING GUTTER LAYBACK (WHERE THE KERB AND GUTTER EXIST). IF A GUTTER LAYBACK DOES NOT EXIST THEN THE CONNECTION MUST BE MADE TO THE GUTTER BY REMOVING THE ADJACENT KERB SECTION ONLY.
- CONNECT TO A DISH CROSSING (WHERE KERB AND GUTTER DOES NOT EXIST). IF A DISH CROSSING DOES NOT EXIST, THEN IT MUST BE CONSTRUCTED IN ACCORDANCE WITH DETAILS CONTAINED IN COUNCIL'S ISSUED FOOTPATH CROSSING LEVELS.

SHAKER PAD (CATTLE GRID)

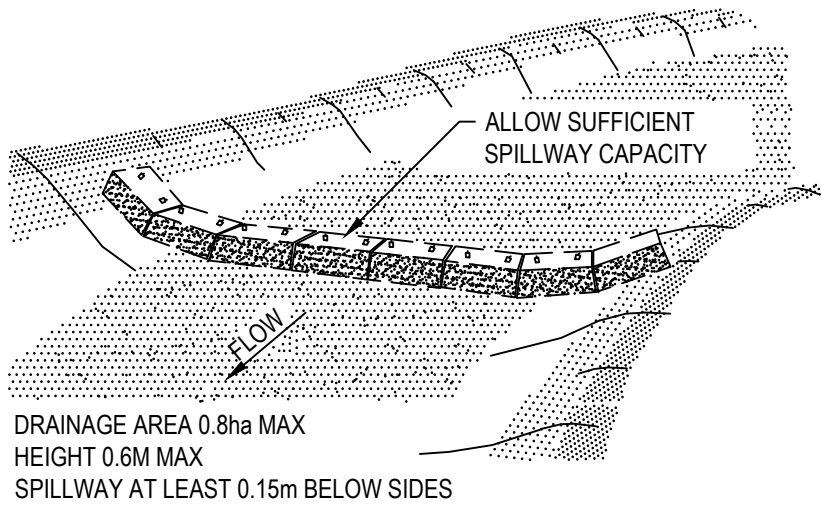
A CORRECTLY DESIGNED AND INSTALLED SHAKER PAD WILL ASSIST IN PREVENTING SEDIMENT TRANSFER FROM A SITE. ANY STABILISED ACCESS POINT (SAP) CAN BE DESIGNED WITH A SHAKER PAD (COMPULSOPRY IN TYPE II SAP'S). SHAKER PADS CAN BE DESIGNED AND CONSTRUCTED TO ENABLE RE-USE ON FUTURE PROJECTS.

THE SHAKER PAD:

- MUST BE DESIGNED AND CERTIFIED BY A PRACTICING STRUCTURAL ENGINEER. THE CERTIFIED DESIGN SHOULD BE SUBMITTED WITH THE RELEVANT APPLICATION.
- CAN BE CONSTRUCTED FROM ANY SUITABLE MATERIAL.
- MUST BE LOCATED ON A SUITABLY PREPARED AND COMPACTED SUB-GRADE/BASE MATERIAL.
- MUST BE SITUATED SUCH THAT THE RUNGS OF THE SHAKER PAD ARE LEVEL WITH THE ADJOINING NATURAL SURFACE.
- MUST BE A MINIMUM OF 3.5m IN LENGTH.
- MUST BE A MINIMUM OF 3.5m IN WIDTH.
- MUST HAVE CLEAR SPACING BETWEEN RUNGS OF 200 - 250mm.
- RUNGS MUST HAVE A MAXIMUM WIDTH (BEARING AREA) OF 75mm.
- MUST HAVE A MINIMUM CLEAR DEPTH OF 300mm IE FORM THE TOP OF THE RUNG TO THE FINISHED SUB-GRADE/BASE LEVEL.



STABILISED SITE ACCESS AND TRUCK WASH DOWN AREA  
NTS



CHECK DAM - STRAW BALE  
NOT TO SCALE

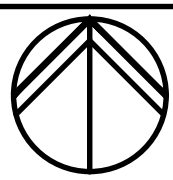
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## A.9 Aboriginal Cultural Heritage Management Sub-plan (ACHMSP)



**NGH**

# **Aboriginal Cultural Heritage Management Sub-Plan**

## **Jindabyne Education Campus**

November 2022

**Project Number: 22-437**





## Document verification

Project Title:	Heritage Management Plan Jindabyne Education Campus
Project Number:	22-437
Project File Name:	22-437 Jindabyne Education Campus ACHMSP Final v1.1

Revision	Date	Prepared by	Reviewed by	Approved by
Draft v1.0	21/10/2022	Tessa Bryant	Kirsten Bradley	Kirsten Bradley
Draft v1.1	25/10/2022	Tessa Bryant	Kirsten Bradley and minor comments by Hansen Yuncken	Kirsten Bradley
Final v1.0	2/11/2022	Tessa Bryant	Kirsten Bradley	Kirsten Bradley
Final v1.1	7/11/2022	Tessa Bryant	Kirsten Bradley	Kirsten Bradley

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## Acronyms, abbreviations and definitions

Aboriginal object	Has the same meaning as the definition of the term in section 5 of the <i>National Parks and Wildlife Act 1974</i>
ACHAR	Aboriginal Cultural Heritage Assessment Report
ACHCRP	Aboriginal Cultural Heritage Consultation Requirements for Proponents
ACHMSP	Aboriginal Cultural Heritage Management Sub-Plan
AHIMS	Aboriginal Heritage Information Management System
Archaeological Salvage	A program of salvage excavation/s (as required) to recover information and/or objects from identified archaeological sites
ASIRF	Aboriginal Site Impact Recording Form
ATR	Archaeological Technical Report
CEMP	Construction Environmental Management Plan
Certifier	Means a council or accredited certifier or in the case of Crown development, a person qualified to conduct a Certification of Crown Building work
Code of Practice	Code of Practice for Archaeological investigation of Aboriginal Objects in NSW (DECCW NSW 2010)
Construction	<p>All physical work to enable operation including (unless specifically excluded by a condition) but not limited to the demolition and removal of buildings, the carrying out of works for the purposes of the development, including bulk earthworks, and erection of buildings and other infrastructure permitted by this consent, but excluding the following:</p> <ul style="list-style-type: none"> <li>• building and road dilapidation surveys;</li> <li>• investigative drilling or investigative excavation;</li> <li>• archaeological salvage;</li> <li>• establishing temporary site offices (in locations identified by the conditions of this consent);</li> <li>• installation of environmental impact mitigation measures, fencing, enabling works; and</li> <li>• minor adjustments to services or utilities</li> </ul> <p>However, where heritage items, or threatened species or threatened ecological communities (within the meaning of the Biodiversity Conservation Act 2016 or Environment Protection and Biodiversity Conservation Act 1999) are affected or potentially affected by any physical work, that work is construction, unless otherwise determined by the Planning Secretary in consultation with EHG or DPE Fisheries (in the case of impact upon fish, aquatic invertebrates or marine vegetation)</p>
CCP	Community Consultation Plan
CEMP	Construction Environmental Management Plan
DECCW	(Former) Department of Environment, Climate Change and Water (NSW) (now DPE)

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DPE	Department of Planning and Environment (NSW)
EIS	Environmental Impact Statement for Jindabyne Education Campus dated December 2021 as amended by: <ul style="list-style-type: none"> <li>• New Education Campus at 207 Barry Way, Jindabyne Submissions Report dated 8 June 2022;</li> <li>• additional information provided by the Applicant to the Department dated 21 June 2022</li> </ul>
ha	hectares
Head contractor	Hansen Yuncken Pty Ltd
Heritage Act	<i>Heritage Act 1977</i> (NSW)
HSE	Health Safety and Environment
Incident	An occurrence or set of circumstances that causes, or threatens to cause, material harm and which may or may not be, or cause, a non-compliance Note: “material harm” is defined in this consent
km	kilometres
LALC	Local Aboriginal Land Council
LGA	Local Government Area
m	metres
Material harm	Is harm that: <ul style="list-style-type: none"> <li>a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or</li> <li>b) results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)</li> </ul>
Mitigation	Activities associated with reducing the impacts of the development prior to or during those impacts occurring
NGH	NGH Pty Ltd
Non-compliance	An occurrence, set of circumstances or development that is a breach of the Development Consent but is not an incident
NPW Act	<i>National Parks and Wildlife Act 1974</i> (NSW)
NSW	New South Wales
Operation	The carrying out of the approved purpose of the development upon completion of construction
PAD	Potential Archaeological Deposit
Principal	NSW Department of Education



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RAP	Registered Aboriginal Party. Means the Aboriginal persons identified in accordance with the document entitled “Aboriginal cultural heritage consultation requirements for proponents 2010” (DECCW)
RtS	Response to Submission Report
WHSE Officer	Work Health, Safety and Environment Officer
SSD	State Significant Development
The Project	Jindabyne Education Campus
WMS	Work Method Statements

## **1. Introduction**

Development Consent was granted on the 10<sup>th</sup> of August 2022 for the construction and operation of a new educational facility at 207 Barry Way, Jindabyne (part of Lot 101 DP 1019527) in the Snowy Monaro Local Government Area (LGA) by the delegate for the Minister for Planning.

The Jindabyne Education Campus ('the Project') is a State Significant Development (SSD) (SSD 15788005) for the construction of a new education campus at Jindabyne, New South Wales (NSW) comprising of a new primary school and a new high school. The purpose of this Aboriginal Cultural Heritage Management Sub-Plan (ACHMSP) is to describe how impacts on Aboriginal heritage will be minimised and managed during construction and operation of the Project. The ACHMSP is part of the Construction Environmental Management Plan (CEMP) for the Project.

A draft Aboriginal Cultural Heritage Assessment Report (ACHAR) was prepared for the Jindabyne Education Campus (NGH 2021), which was included as part of the Jindabyne Education Campus Environmental Impact Statement (EIS) (Mecone 2021). The EIS summarised the key findings of the ACHAR including impacts to Aboriginal heritage and any proposed mitigation measures to minimise impacts, noting sub-surface testing was in progress. A final ACHAR and Archaeological Technical Report (ATR) (NGH 2022) including the results of sub-surface testing was included in the Response to Submissions Report (RtS) (Mecone 2022) which detailed proposed mitigation measures including the archaeological salvage of Aboriginal sites proposed to be impacted by the development of the Jindabyne Education Campus.

Hansen Yuncken Pty Ltd has been engaged as the construction Head contractor for the Project by the Proponent and Principal, the NSW Department of Education.

### **1.1 Context**

The CEMP prepared for the Project complies with the consent, issued by the delegate for the NSW Minister for Planning and all applicable legislation, for the construction and operation of the Project.

This ACHMSP is part of the Principal and their Head contractor's environmental management framework for the Project, as described in the overall CEMP. This ACHMSP has been prepared to address the requirements of the mitigation and management measures listed in the Development Consent relevant for Aboriginal Heritage during the construction and operation of the Project.

This ACHMSP has been prepared by suitably qualified, independent, and experienced archaeologists Dr Tessa Bryant and Kirsten Bradley from NGH. This ACHMSP will be finalised in consultation with the Registered Aboriginal Parties (RAPs) for the Project.

### **1.2 Environmental Management Strategic Framework**

The ACHMSP is part of the Principal and their Head contractor's environmental management framework for the Project, as described in the CEMP. This ACHMSP forms part of the CEMP for the Project and is to be read in conjunction with the overarching CEMP. It is applicable to all staff, contractors and sub-contractors associated with the construction and operation of the Project.

Mitigation and management measures identified in this plan will be incorporated into the site induction and Work Method Statements (WMS), as outlined in the CEMP, where applicable.

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All Project personnel, contractors and sub-contractors will undertake a site induction prior to commencing work on the Project site and will sign to acknowledge they have understood the contents of the induction. Additionally, all personnel undertaking a task governed by a work method statement must have signed that they have participated in a toolbox training on the work method statement, and that they have read and understood their obligations prior to commencing work.

Used together, the CEMP, management measures, procedures, site induction and WMS form management guides that clearly identify required environmental management actions for reference by the personnel, contractors and sub-contractors for the Project.

As a subplan of the CEMP, the review and document control processes for this plan will be undertaken in line with standard document control policy and procedures.

Further information about the nature of works to be completed and details on the Project can be found in the overarching CEMP.

## **2. Purpose and Objectives**

### **2.1 Purpose and Objectives**

The purpose of this ACHMSP is to provide a consistent and transparent process for the management of Aboriginal cultural heritage and to describe how impacts on Aboriginal heritage will be minimised and managed during construction and operation of the Project in line with the following document.

- Aboriginal Cultural Heritage Assessment Jindabyne Education Campus (NGH 2022)

In addition, the ACHMSP provides guidance for the management of any unexpected Aboriginal heritage objects that may be encountered during works for the Project. This ACHMSP applies specifically to proposed activities carried out within Project designated area in the Site Boundary.

The key objective of the ACHMSP is to ensure that impacts to Aboriginal heritage items which are known to be present within the Project area are minimised and that any impacts are within the scope permitted by the planning approval. To achieve this objective, the following will be undertaken:

- Ensure appropriate controls and procedures are implemented during construction and operation activities to avoid (where necessary) or minimise potential adverse impacts to Aboriginal heritage in the Site Boundary.
- Ensure appropriate measures are implemented to address the mitigation measures as detailed in the Development Consent, RtS and Aboriginal Cultural Heritage Assessment Jindabyne Education Campus (NGH 2022).
- Ensure appropriate measures are implemented to comply with all relevant legislation and other requirements as described in Section 3 of this plan.

### **2.2 Targets**

The following targets have been established for the management of Aboriginal heritage impacts during the construction and operation of the Project:

- To promote the safeguarding and protection of all Aboriginal cultural heritage in the area.
- To ensure that Aboriginal cultural heritage management measures are fully implemented, and no incidents occur.
- Ensure full compliance with the relevant legislative requirements, the Development Consent, RtS and the Aboriginal Cultural Heritage Assessment Jindabyne Education Campus (NGH 2022).
- Ensure avoidance to the known artefact site Jindabyne Campus AFT 2 by works for this Project.
- Follow correct procedure and ensure notification of any previously unidentified Aboriginal objects/places uncovered during construction and operation of the Project.

## **3. Environmental Requirements**

### **3.1 Legislative and Other Environmental Management Requirements**

#### **Legislation**

Legislation relevant to heritage management includes:

- *Environmental Planning and Assessment Act 1979 (EP&A Act)*
- *National Parks and Wildlife Act 1974 (NPW Act)*
- *National Parks and Wildlife Regulations 2019*
- *Native Title Act 1994 (NSW)*
- *Native Title Act 1993 (Commonwealth)*
- *Environment Protection Biodiversity Conservation Act 1999 (EPBC Act) (Commonwealth)*
- *Aboriginal and Torres Strait Islander Heritage Protection Act 1984 (Commonwealth)*

Relevant provisions of the above legislation are explained in the register of legal and other requirements included in the CEMP

#### **Guidelines and Standards**

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

- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH 2011);*
- *Code of Practice for the Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW NSW 2010a);*
- *Aboriginal cultural heritage consultation requirements for proponents 2010 (ACHCRP) (DECCW NSW 2010b).*

### **3.2 Permits and licences**

There are no licences or permits directly relevant for the Project in respect to the management of Aboriginal heritage. Further details regarding permits and licences are provided in the CEMP.

### **3.3 Development Consent**

Development Consent was issued by delegate for the Minister of Planning on the 10<sup>th</sup> of August 2022. Details of the Development Consent in relation to Aboriginal heritage are summarised in Table 3-1 below.

A detailed list of heritage control measures to be implemented to ensure compliance with the Development Consent, RtS and Aboriginal Cultural Heritage Assessment Jindabyne Education Campus (NGH 2022) for the Project is detailed in Section 7 of this document. As noted in the Development Consent, in addition to meeting the specific performance measures and criteria of the Project consent, all reasonable and feasible measures must be implemented to prevent and/or minimise any material harm to the environment that may results from the construction and operation

of the development is noted, this includes harm to Aboriginal heritage objects. This document outlines how this is to be achieved.

Table 3-1 Project conditions of consent relevant to the ACHMSP.

Condition	Condition of Consent	Location of Relevant Information
A1 of Schedule 2	In additional to meeting the specific environmental performance criteria established under this consent, all reasonable and feasible measures to prevent, and, if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development.	This document and Section 7.
A2 of Schedule 2	The development may only be carried out: <ul style="list-style-type: none"> <li>a) in compliance with the conditions of this consent;</li> <li>b) in accordance with all written directions of the Planning Secretary;</li> <li>c) generally in accordance with the EIS and Response to Submissions and Supplementary Response to Submissions;</li> <li>d) in accordance with the approved plans</li> </ul>	This document
A8 of Schedule 2	<p><b>Evidence of Consultation</b></p> <p>Where conditions of this consent require consultation with an identified party, the Applicant must:</p> <ul style="list-style-type: none"> <li>a) Consult with the relevant party prior to submitting the subject document for information or approval; and</li> <li>b) Provide details of the consultation undertaken including: <ul style="list-style-type: none"> <li>i) The outcome of that consultation, matters resolved and unresolved; and</li> <li>ii) Details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</li> </ul> </li> </ul>	This document, Section 4 and Appendix B.
A28 of Schedule 2	<p><b>Compliance</b></p> <p>The Applicant must ensure that all of its employees, contractors (and their sub-contractor) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect to the developments.</p>	Section 8



Condition	Condition of Consent	Location of Relevant Information
A29 of Schedule 2	<b>Incident Notification, Report and Response</b> The Planning Secretary must be notified through the major projects portal immediately after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident.	Section 8.6
A30 of Schedule 2		
A31 of Schedule 2	<b>Non-Compliance Notification</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 certified must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.  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.  A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Section 8.6
A32 of Schedule 2		
A33 of Schedule 2		
A34 of Schedule 2	<b>Revision of Strategies, Plans and Programs</b> Within three months of: <ul style="list-style-type: none"> <li>a) the submission of a compliance report</li> <li>b) the submission of an incident report under condition A30;</li> <li>c) the submission of an Independent Audit under condition C41 or C42;</li> <li>d) the approval of any modification of the conditions of this consent; or</li> <li>e) The issue of a direction of the Planning Secretary under condition A2 which requires a review,</li> </ul> the strategies, plans and programs required under this consent, must be reviewed, and the Certifier must be	Section 8 and 9

Condition	Condition of Consent	Location of Relevant Information
A35 of Schedule 2	<p>notified in writing that a review is being carried out.</p> <p>If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans, programs or drawing required under this consent must be revised, to the satisfaction of the Certifier. Where revisions are required, the revised document must be submitted to the Certified for information within six weeks of the review.</p> <p><i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i></p>	
B15 of Schedule 2	<p>Prior to the commencement of construction, the Applicant must submit a Construction Environmental Management Plan (CEMP) to the Certifier and provide a copy to the Planning Secretary for information. The CEMP must include, but not be limited to:</p> <ul style="list-style-type: none"> <li>c) an unexpected finds protocol for Aboriginal heritage and associated communications procedure</li> <li>d) mitigation measures in accordance with: <ul style="list-style-type: none"> <li>v) Aboriginal Cultural Heritage Management Sub-Plan (see condition B20)</li> </ul> </li> </ul>	<p>CEMP and this document Appendix D</p> <p>This document</p>
B20 of Schedule 2	<p>The Aboriginal Cultural Heritage Management Sub-Plan (ACHMSP) must address, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitable qualified and experiences expert in consultation with the Registered Aboriginal Parties;</li> <li>b) describe the measures to protect the known artefact Jindabyne Campus AFT 2 in perpetuity</li> <li>c) implement recommendations made in the Aboriginal Cultural Heritage Assessment for Jindabyne Education Campus dated 23 May 2022 prepared by NGH Pty Ltd</li> </ul>	This document
C9 of Schedule 3	<p><b>Implementation of Management Plans</b></p> <p>The Applicant must carry out the construction of the development in accordance with the most recent version of the CEMP (including Sub-Plans).</p>	CEMP and this document, Section 9

Condition	Condition of Consent	Location of Relevant Information
C27 of Schedule 3	<p><b>Aboriginal Cultural Heritage</b></p> <p>Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by NGH Pty Ltd dated 23 May 2022.</p>	This document, Section 7 and Appendix D
C28 of Schedule 3	<p>A representative of the Local Aboriginal Land Council must be invited to observe works associated with condition B20 undertaken on the site. Any invitation must be provided at least 14 days prior to the works occurring and reasonable arrangements agrees for the observation of the works where an invitation is accepted. In the event that any unexpected finds are discovered, any direction from the Local Aboriginal Land Council representative and the procedures outlined in condition C29 must be followed.</p>	
C29 of Schedule 3	<p><b>Unexpected Finds Protocol – Aboriginal Heritage</b></p> <p>In the event that surface disturbance identifies a new Aboriginal object:</p> <ul style="list-style-type: none"> <li>a) all works must halt in the immediate area to prevent any further impacts to the object(s);</li> <li>b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects;</li> <li>c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW under Department of Premier and Cabinet and the management outcome for the site included in the information provided to AHIMS;</li> <li>d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and</li> <li>e) works may only recommence with the written approval of the Planning Secretary</li> </ul>	Section 8.5.1 and 8.5.2 Appendix D

Condition	Condition of Consent	Location of Relevant Information
C40 of Schedule 3	<p><b>Independent Environmental Audit</b></p> <p>Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit</p> <p>Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements</p> <p>The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those agree to above, upon giving at least 4 weeks' notice to the Applicant of the date or timing upon which the audit must be commenced.</p> <p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements, the Applicant must:</p> <ul style="list-style-type: none"> <li>a) review and respond to each Independent Audit Report prepared under Condition C40 of this consent, or condition C42 where notice is given;</li> <li>b) submit the response to the Planning Secretary; and</li> <li>c) make each Independent Audit Report and response to it publicly available within 60 days after submission to the Planning Secretary.</li> </ul> <p>Independent Audit Reports and the applicant/ proponent's response to audit findings must be submitted to the Planning Secretary within two months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements unless otherwise agreed by the Planning Secretary.</p> <p>Notwithstanding the requirements of the Independent Audit Post Approval Requirements, the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an audit has demonstrated operational compliance.</p>	Section 8.4
C41 of Schedule 3		
C42 of Schedule 3		
C43 of Schedule 3		
C44 of Schedule 3		
C45 of Schedule 3		
Appendix 2: Written Incident Notification and Reporting	<p><b>Written Incident Notification Requirements</b></p> <ul style="list-style-type: none"> <li>1. A written incident notification addressing the requirements set out below must be emailed to the Planning Secretary through the major projects</li> </ul>	Section 8.6

Condition	Condition of Consent	Location of Relevant Information
Requirements	<p>portal within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant fails to give the notification required under condition A9 or, having given such notification, subsequently forms the view that an incident has not occurred.</p> <p>2. Written notification of an incident must:</p> <ul style="list-style-type: none"> <li>(a) identify the development and application number;</li> <li>(b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);</li> <li>(c) identify how the incident was detected;</li> <li>(d) identify when the applicant became aware of the incident;</li> <li>(e) identify any actual or potential non-compliance with conditions of consent;</li> <li>(f) describe what immediate steps were taken in relation to the incident;</li> <li>(g) identify further action(s) that will be taken in relation to the incident; and</li> <li>(h) identify a project contact for further communication regarding the incident.</li> </ul> <p>3. Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Applicant must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.</p> <p>4. The Incident Report must include:</p> <ul style="list-style-type: none"> <li>(a) a summary of the incident;</li> <li>(b) outcomes of an incident investigation, including identification of the cause of the incident;</li> <li>(c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and</li> <li>(d) details of any communication with other stakeholders regarding the incident.</li> </ul>	

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The Aboriginal heritage items within the development area and the mitigation recommendations from the ACHAR for the Project are listed below for easy reference. AHIMS# 62-1-0392/ Jindabyne Campus AFT 2 (an isolated find) is listed in the Development Consent condition B20 must not be harmed (Table 3-2). This site is outside of the development footprint. The Development Consent condition B20 also requires the recommendations from the ACHAR which was completed by NGH Pty Ltd dated May 2022 be implemented.

Table 3-2 Aboriginal heritage item listed in the Development Consent and ACHAR to not be harmed by the development.

AHIMS	Name	Type	Mitigation
62-1-0392	Jindabyne Campus AFT 2	Isolated Find	No harm allowed, protect in perpetuity

Aboriginal heritage items where mitigation is required prior to impact if these sites are unable to be avoided by the development are listed in Table 3-3 as noted in the ACHAR (NGH 2022).

Table 3-3 Aboriginal heritage items listed in the ACHAR (NGH 2022) for salvage prior to impact.

AHIMS	Name	Type	Mitigation
62-1-0385	Jindabyne Campus AFT 1/ PAD 1	Artefact Scatter + Potential Archaeological Deposit	Community collection surface salvage and Subsurface (archaeological) salvage
62-1-0386	Jindabyne Campus AFT 3/ PAD 3	Artefact Scatter + Potential Archaeological Deposit	Community collection surface salvage
62-1-0387	Jindabyne Campus AFT 4	Isolated Find	Community collection surface salvage

No mitigation was recommended for Jindabyne Campus PAD 2.

## **4. Consultation for the ACHMSP**

Condition B20(a) of Schedule 2 of the Development Consent requires the ACHMSP be prepared in consultation with the Registered Aboriginal Parties (RAPs).

The consultation process for this Project began in 2021 for the ACHAR. The consultation with Aboriginal stakeholders was undertaken in accordance with clause 80C of the *National Parks and Wildlife Amendment (Aboriginal Objects and Aboriginal Places) Regulation 2010* following the consultation steps outlined in the ACHCRP guide.

The Project is located within the boundaries of the Bega Local Aboriginal Land Council (Bega LALC).

As a result of this process, there are twenty Registered Aboriginal Parties (RAPs) for this Project, as listed below and outlined in Appendix B.

- Bega LALC
- Ngarigo and Djiringanj people and elders (John Dixon)
- Wagonga Local Aboriginal Land Council (Wagonga LALC)
- Ngarigu Brajerak
- PD Ngunawal Consultancy
- Yurwang Gundana Cultural Heritage Services
- Gulgunya Ngunawal Heritage Aboriginal Consultancy (GNHAC)
- Didge Ngunawal Clan
- Clive Freeman
- Ngunawal Heritage Aboriginal Corporation
- Ngarigo Nation Indigenous Corporation
- Muragadi Heritage Indigenous Corporation
- Murri Bidgee Mullangari Aboriginal Corporation
- Merrigarn Indigenous Corporation
- Wolgalu Umbe Traditional Custodians Corporation
- Redacted Group #1
- Redacted Group #2
- Redacted Group #3
- Redacted Group #4
- Redacted Group #5

The five redacted groups who registered an interest in the project have requested that their details are not released.

As per Condition A8, B20(a) and C29 of the Development Consent, consultation with the Project RAPs is required and ongoing during the implementation of the Plan. A log of consultation will be kept by the Project's Environmental Representative. Consultation with the RAPs will generally be provided in writing via email by the Project's Environmental Representative as required.

For this ACHMSP, additional consultation during the development of this document was undertaken with the RAPs as required by the Development Consent. A copy of this draft sub plan was sent via



email to all RAPs for comment on the 25<sup>th</sup> of October 2022. Any comments on the draft ACHMSP were requested to be provided within 7 days of the sub plan being provided to the RAPs.

Comments on the draft ACHMSP, were received from four of the RAPs over the 31<sup>st</sup> of October 2022 and 1<sup>st</sup> of November 2022. A copy of these responses is held by NGH which can be provided on request to consenting authority and/or Certifier. As a number of the responses have come from RAPs whose details are redacted in public documents for this Project, as a courtesy all responses to the draft ACHMSP have been redacted in this plan.

No issues or concerns were raised about the draft ACHMSP from the RAPs who provided a response and this document which subsequently finalised.

On the 7<sup>th</sup> of November 2022 verbal comments were provided to NGH by John Dixon- Ngarigo and Djiringanj people and elders. It was specially noted that C28 of Schedule 3 of the Development Consent must be reworded to ensure the opportunity to be involved in mitigation works and events of unexpected finds for this project state Aboriginal custodian rather than specially identifying the LALCs involvement in works for this project. Subsequent, to the modification of this condition this plan should be updated accordingly however it was stressed that regardless of this condition an opportunity to participate in the mitigation works should be provided to the appropriate representatives for the Aboriginal custodians of the land on which the project is being built. These comments were requested to be included into this plan. Where possible these comments have been incorporated into version Final v1.1 however NGH note that this plan is currently bounded by the existing conditions of the Development Consent.

## **5. Existing Heritage**

As part of the EIS, NGH Pty Ltd (2021) prepared a draft ACHAR for the proposed Jindabyne Education Campus that detailed the findings of the survey of the Project area and recommended subsurface investigation of four areas which were determined to have potential archaeological deposits (PAD). The findings of the draft ACHAR (2021) which did not include the results of the subsurface investigations were summarised within the EIS (Mecone 2021). The subsurface testing results were presented in an Archaeological Technical Report (ATR) (NGH 2022b) which was submitted as part of the documents provided in the response to submission. The final ACHAR (NGH 2022a), which included a summary of the results of the subsurface test excavation, was also included in the response to submission for the Project. A brief summary of the results of the Aboriginal heritage assessments undertaken for the Project is included below.

The assessment included a review of relevant information relating to the landscapes within the Project area. It was noted that no Aboriginal sites had previously been recorded within the Project area. The Project area is situated to the west of a second order drainage channel of Lees Creek and an unnamed tributary of Lees Creek to the north. Lees Creek flows into Stinky Bay, Lake Jindabyne 1km to the east but would have joined with the Snowy River approximately 2km away prior to the construction of the dam. The Project area comprises rolling hills and dissected plateaus. Areas of elevated level terrain within the Project area were identified to have higher archaeological potential.

Based on previous archaeological investigations and Aboriginal site modelling for the region the Project area was noted as having the possibility of containing archaeological sites, especially given that Aboriginal people have lived in the region for tens of thousands of years. This would most likely be in the form of stone artefacts. A low potential for burials to occur was also noted as burial sites have been identified within the local Jindabyne area.

Despite the variable visibility encountered during the survey, four PAD areas, one low density artefact scatter and three isolated finds were recorded. Jindabyne Campus PAD 1 was in the southwest, PAD2 in the central west, PAD3 in the central north and PAD 4 in the eastern central portion of the Project area (NGH 2021). Jindabyne Campus AFT1 was a single quartz flake (isolated find) considered to be *in situ* which was located in a small exposure at the base of a mature tree on flat ground in the southwest of the Project area. Jindabyne Campus AFT2 was a quartz flaked piece (isolated find) in a small exposure at the base of a former golf tee built up from fill in the southwest of the Project area and was considered unlikely to be *in situ*. Jindabyne Campus AFT3 comprised three artefacts, two quartz flakes and one volcanic flake fragment that were eroding from a gravelly substrate below the steep bank of an elevated golf tee, in a disturbed area in the central west of the Project area. Jindabyne Campus AFT4 was a quartz flake fragment (isolated find) on the steeper base on a knoll in an eroded area, which was unlikely to be *in situ* in the northeast of the Project area.

Subsequent to the survey, a limited program of subsurface test excavation of the PADs was undertaken following the *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales* (NGH 2022a & 2022b). A total of 20 test pits were excavated across the four PADs within the Project area, with seven test pits excavated in PAD 1, seven test pits excavated in PAD 2, four test pits excavated in PAD 3 and two test pits excavated in PAD 4. A total of eight artefacts were recovered from the test excavation, with six stone artefacts recovered from PAD 1, one stone artefact recovered from PAD 2 and one stone artefact from PAD 3. As no cultural material was recovered from PAD 4 it was determined not to be a site.

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Within PAD 1 four artefacts came from TP 1, and one artefact each from TP 5 and TP6, this cultural material was determined to be associated with the site Jindabyne Campus AFT1 / PAD 1. One artefact came from TP 5 in PAD 2 which was recorded as the site Jindabyne Campus PAD2 and one from TP 1 in PAD 3 which was determined to be associated with the site Jindabyne Campus AFT3 / PAD 3. The artefacts recovered from the testing were mostly silcrete and quartz flakes and flake fragments with one volcanic asymmetric backed artefact and one volcanic flake also recovered. The test excavation results were indicative of a low density background scatter associated with the transient use of the surrounding landscape.

Table 5-1 below lists the identified risks to known Aboriginal sites within the Project area and the mitigation measures as recommended in the final ACHAR. It was also noted that it should also be considered that the campus acknowledges the presence of the Aboriginal sites in some way.

Table 5-1 Identified risks to known Aboriginal sites within the Project area as noted in the ACHAR (NGH 2022).

AHIMS #	Site name	Site Type	Type of harm	Degree of harm	Consequence of harm	Recommendation
62-1-0385	Jindabyne Campus AFT 1 / PAD 1	Artefact Scatter	Indirect	Total	Total loss of value	Limited subsurface salvage and salvage of surface objects prior to development. Salvage would occur in a minimum of one open area of 2m x 2m around the location of TP1. Additional options for a second open area or expansion of the first should also be included in the methodology.
62-1-0392	Jindabyne Campus AFT 2	Isolated Find	Indirect	Partial	Partial loss of value	As the site is outside of the Proposal Area and will not be impacted, a barricade will need to be erected to form a 5m buffer around the site to ensure it remains intact.
62-1-0386	Jindabyne Campus AFT 3 / PAD 3	Artefact Scatter	Direct	Total	Total	Salvage surface objects prior to development
62-1-0387	Jindabyne Campus AFT 4	Isolated Find	Direct	Total	Total	Salvage surface objects prior to development
62-1-0410	Jindabyne Campus PAD 2	Isolated Find	Direct	Total	Total	No further mitigation required
NA	Jindabyne Campus PAD 4	Not a site	NA	NA	NA	No further mitigation required

## 6. Heritage Mapping

Mapping of the heritage items and recommended mitigation for the Project are shown in Figure 6-1.

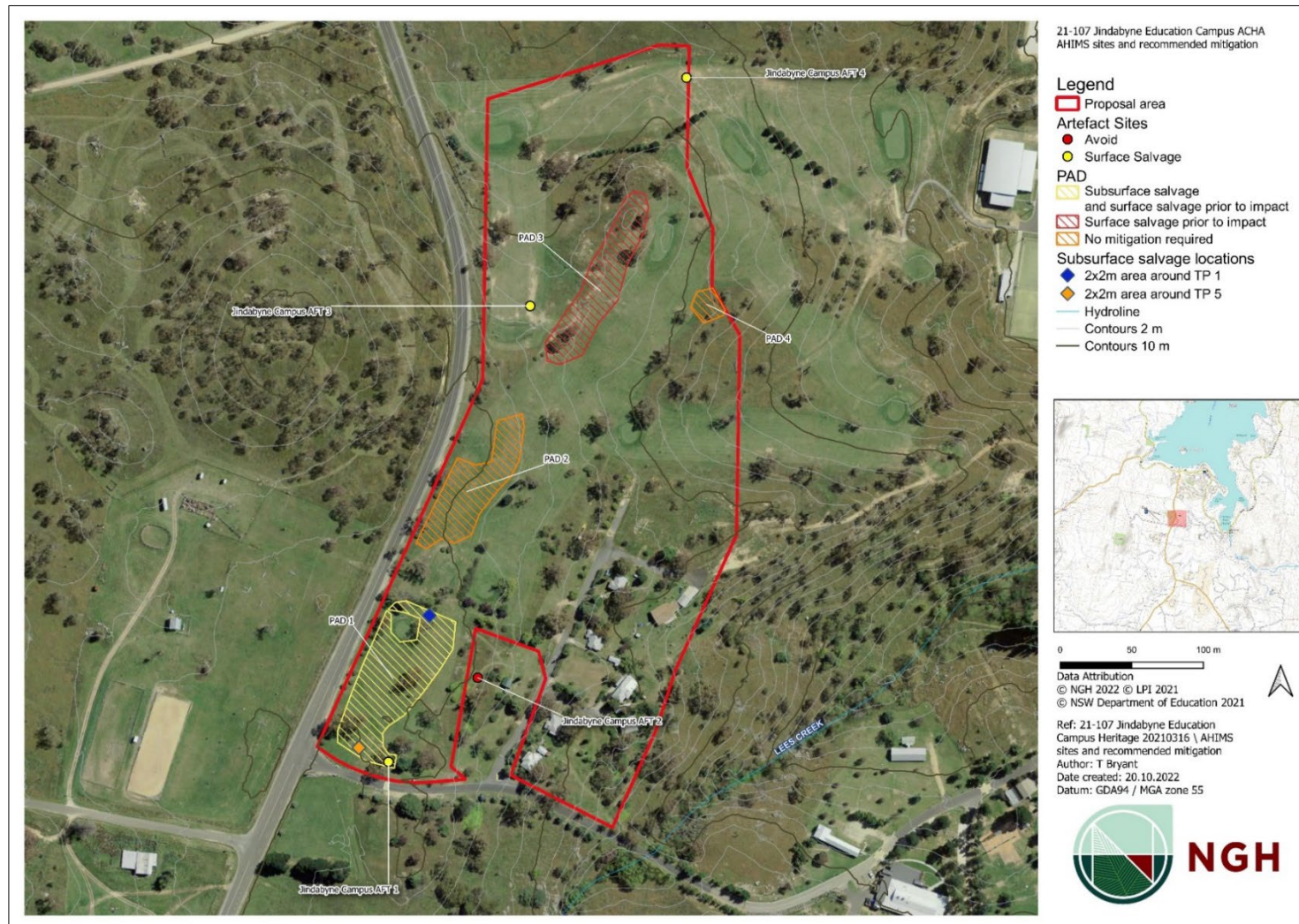


Figure 6-1 Location of known Aboriginal sites with the Project area and required mitigation measures.



## 7. Heritage Control Measures

A range of mitigation requirements and control measures are identified in the Development Consent, EIS, RtS and heritage assessments undertaken for the Project. Specific measures and requirements to address impacts to heritage values are outlined in Table 7-1. The measures have been listed to cover broad activities and as such there may be some repetition of mitigation measures. This table also specifically includes recommendations made in the Aboriginal Cultural Heritage Assessment for the Jindabyne Education Campus dated 23 May 2022 prepared by NGH Pty Ltd.

Table 7-1 Aboriginal Heritage control measure for the Project.

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<b>General</b>				
All reasonable and feasible measures must be implemented to prevent and/or minimise any material harm to the environment, including Aboriginal objects, that may result from the construction and operation of the development.	This document	Pre-construction Construction Operational	Head contractor Project Manager	This document
Ensure the development does not cause any direct or indirect impacts on the Aboriginal heritage items identified in the Development Consent (Jindabyne Campus AFT 2) as sites to avoid impacting or other sites located outside the approved development footprint.	This document Development Consent	Pre-construction Construction Operational	Principal Head contractor Project Manager	This document Development Consent ACHAR
Implementation of approved Aboriginal Cultural Heritage Management Sub-Plan prior to the commencement of construction as part of the submission of the CEMP to the Certifier and provided to the Planning Secretary for information.	This document CEMP Development Consent	Pre-construction	Head contractor Project Manager	This document
A copy of the ACHMSP should be kept on site during construction and operation of the Project and be readily available for reference if and as required.	This document	Pre-construction Construction Operational	Head contractor Environmental Officer	This document

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Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
Training will be provided to all personnel involved in construction and management phases of the Project, including relevant sub-contractors on Aboriginal heritage requirements from this sub plan through inductions, toolboxes, and targeted training.	Induction package Toolbox training material Targeted training material	Pre-Construction Construction Operational	Project Manager Environmental Officer Head contractor	This document Section 8.2 and
All employees, contractors and utility staff working on site will receive Aboriginal Cultural Heritage Awareness Training. It will be provided to all personnel in the form of an induction before they begin work on site. A record of this training will be kept.	Induction package	Pre-construction Construction Operational	Project Manager Head contractor Environmental Officer	This document Section 8.2
A strategy for the long-term management of any items or material that are salvaged would be developed in consultation with the registered Aboriginal parties. It is recommended that the artefacts recovered during salvage would be relocated and buried in a safe location within the Project area outside the approved development footprint such as at or near the location of Jindabyne Campus AFT 4, however long-term management may include options such as: <ul style="list-style-type: none"> <li>a. Buried in accordance with Requirement 26 of the <i>Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW</i> in a safe location away from development.</li> <li>b. Kept as a display in the school campus or for teaching purposes. This would require the completion of a Care Agreement under Section 85 of the NPW Act.</li> <li>c. Consultation with the RAPs regarding their preference for storage and management of any collected artefacts should continue.</li> </ul>	Development Consent ACHAR This Plan	Pre-construction Construction	Project Manager Head contractor Environmental Officer Project Archaeologist	This document Appendix C and Section 7.2
The location of all Aboriginal sites which are not approved for impacts (Jindabyne Campus AFT 2) and/or proposed to be avoided by impacts based on the final design should be clearly shown on all relevant construction maps and plans.	Construction mapping and plans	Pre-construction Construction Operational	Head contractor Project Manager	This document and construction mapping and plans

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Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
Further archaeological assessment would be required if the Project activity extends beyond the areas assessed to date. This would include consultation with the registered Aboriginal parties and may include further field survey and subsurface testing.	Heritage reports Development Consent	Design Pre-construction Construction Operational	Principal	Development Consent Heritage reports This document
A formal modification to the development consent would be required if any activity were proposed to extend beyond the area assessed and granted for development approval.	Development Consent	Design Pre-construction Construction Operational	Principal	Development Consent
Aboriginal heritage must be included within any major environmental audit for the Project	Development Consent This document	Pre-construction Construction Operational	Independent Auditor Project Manager	This document Section 8.4
The Principal must notify the owner of the land at the location of Jindabyne Campus AFT 2 of the presence of this Aboriginal site and that it is noted in the conditions of this project as a site which must be avoided in perpetuity.	Development Consent Heritage Assessments	Design Pre-construction Construction Operational	Principal	Development Consent Heritage reports This document
To ensure that there are no impacts to the location of Jindabyne Campus AFT 2 (in perpetuity) by activities associated with the education campus, the Principal should consider the erection of permanent fencing of the lands managed by the Principal for this Project in proximity of this location, ensuring the avoidance of Jindabyne Campus AFT 2.	Development Consent Heritage Assessments	Design Pre-construction Construction Operational	Principal	Development Consent Heritage reports This document
<b>PRE-CONSTRUCTION</b>				
Temporary fencing will be placed around the school site during construction to ensure all works are within the approved area and to ensure no impacts to the site Jindabyne Campus AFT 2 during construction works.	RtS	Pre-construction Construction	Head contractor Environmental Officer	This document



Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
Delineation and signage of Aboriginal sites that will not be impacted by the proposed development works within the Project area will be put in place prior to any construction works commencing with a minimum 5 metre no go area fenced to ensure no inadvertent impacts during construction can occur.	ACHAR ACHMSP Development Consent	Pre-construction Construction Operational	Head contractor Environmental Officer	This document Section 8.3 Table 5-1
Delineation and signage of the artefact relocation site/s will also occur (if construction works are still occurring) once the relocation has occurred if reburial of the material is the chosen long term management option selected by the RAPs for any salvaged material and the objects previously recovered from test excavation which are in the temporary care of NGH. A minimum 5 m buffer zone is required to be placed around the artefact relocation site/s (if construction works are still occurring) to ensure they will not be impacted into the future. No future works can occur which will impact the relocation site.	ACHAR This document	Pre-construction Construction	Head contractor Environmental Officer	This document
Temporary storage of any recovered salvaged material may be temporarily stored with NGH in a secure locked cabinet at the NGH Canberra office with the material previously recovered from testing, until a suitable reburial location and/or the long term management of material is agreed upon with the RAPs and Principal. This may occur post construction and will occur within 2 years of the completion of the construction works.	This document	Pre-construction Construction Operational	Principal	This document
A representative of the appropriate Local Aboriginal Land Council (the Bega LALC) must be invited to observe works associated with delineation of Aboriginal sites that will not be impacted, salvage and unexpected finds (or any works undertaken as part of Condition B20). Any invitation must be provided at least 14 days prior to the works occurring and reasonable arrangements agreed for the observation/participation of the works where an invitation is accepted. This opportunity should, where possible, also be expanded to a representative for the Aboriginal Custodian of the land.	Development Consent	Pre-construction Construction	Head contractor Environmental Officer Project archaeologist	Development Consent This document
A minimum 5 m buffer must be observed around all sites with stone artefacts until salvage of these heritage items/sites is undertaken as recommended by the ACHAR and approved by the Development Consent.	ACHAR ACHMSP	Pre-construction Construction	Head contractor Environmental Officer	This document Table 5-1

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
A new site card/s must be completed on the AHIMS database for the relocated/reburial location of the salvage sites. This must occur within 3 months of the actions being completed for the reburial of the salvaged sites.	Code of Practice	Pre-construction	Head contractor Project Manager Project archaeologist	Code of Practice Section 7.2
Any salvage works would be conducted by an archaeologist with representatives of the Registered Aboriginal Parties, including with at a minimum one representative of the Bega LALC invited to participate. The invitation the RAP/s selected by Principal and/or Head contractor to participate in salvage works must be provided at least 14 days' notice prior to the works occurring.	Code of Practice ACHAR ACHMSP Development Consent	Pre-construction Construction	Head contractor Project Manager Project archaeologist	This document Appendix C Development Consent
The salvage of Aboriginal objects approved for impacts must occur prior to construction works commencing at these locations if impacts to these sites cannot be avoided. Community collection of surface artefacts will be incorporated into the pre-construction phase. All reasonable attempts to relocate the surface artefacts facing potential harm in the Project area if they are unable to be avoided will be undertaken to the stratification of the RAPs and archaeologist who participate in this work. The Community Collection program would be undertaken by a qualified archaeologist and RAP representative/s (as selected by the Principal and/or Head contractor).	Heritage Assessments This Plan RtS	Pre-construction	Head contractor Project Manager Project archaeologist	This document Section 3.3 Appendix C
Salvage excavation is required prior to construction works commencing at the location of PAD 1 if the area cannot be avoided by impacts. Salvage excavation would be incorporated into the pre-construction phase. Salvage excavation would occur in a minimum of one open area of 2m x 2m around the location of TP1 (where the highest density of artefacts was recorded) if impacts to this location cannot be avoided. Options for additional expansion or opening of a second area are to be included in the salvage methodology and implement if determined to be warranted.	Code of Practice ACHAR ACHMSP Development Consent RtS	Pre-construction	Head contractor Project Manager Project archaeologist	This document Appendix C
An Aboriginal Site Impact Recording Form will be required to be completed and submitted to AHIMS for any site harmed or destroyed from salvage and/or construction works. Artefact disposition and storage must be done in accordance with Requirement 26 of the Code of Practice (DECCW 2010:35-6).	Code of Practice Aboriginal Site Impact Recording Form	Pre-construction	Head contractor Project Manager Project archaeologist	Code of Practice Section 7.2

Measure/Requirement	Resources Needed	When to Implement	Responsibility	References
<b>Construction</b>				
Construction must be undertaken in accordance with the recommendations of the Aboriginal Cultural Heritage Assessment Report prepared by NGH Pty Ltd dated 23 May 2022.	Development Consent	Construction	Head contractor	This document AHCAR
Where any additional, unrecorded Aboriginal or non-Aboriginal objects are encountered during works within the approved development footprint (Appendix A of this Plan) the Unexpected Finds Procedure will be followed.	Unexpected Finds Procedure Site Plan Development Consent	Construction Operational	Head contractor Project Manager Environmental Officer All personnel	This document Unexpected Finds Procedure Appendix D
If human remains are discovered on site, then all work surrounding the area must cease immediately, the area must be secured and NSW Police notified. The Unexpected Finds Procedure will be followed to notify Heritage NSW as soon as possible. Work must not recommence in the area until this is authorised by Heritage NSW and/or NSW Police.	Unexpected Finds Procedure	Construction Operational	Head contractor Project Manager Environmental Officer All personnel	This document Unexpected Finds Procedure Appendix D .1 Section 8.5.1
<b>Operational</b>				
The campus once constructed acknowledges the presence of the Aboriginal sites in some way. It may be possible for example to have site locations marked, the school entrance to acknowledge the Ngarigo community and use of the land, or even to display some artefacts. These measures would need to be considered and discussed with the RAPs to ensure their agreement and to obtain any suitable images, wording or other materials used is approved.	Heritage Assessments	Operational	Principal	Development Consent Heritage reports This document

## **7.1 Temporary/short term storage of artefacts**

As part of the ACHAR (NGH 2022a), a subsurface test excavation was undertaken. All artefacts recovered from the subsurface testing program for this Project are currently in temporary care in a locked cabinet at NGH Canberra office.

The Aboriginal artefacts recovered from the surface collection and archaeological excavation salvage program, which is required to be undertaken prior to any constructions works if these sites cannot be avoided by works, may be temporarily held in a secure locked cabinet at the NGH Canberra office with the material previously recovered from testing, until a suitable reburial location and/or the long term management of material is agreed upon with the RAPs and Principal. The temporary storage of these objects is intended to not exceed within 2 years of the completion of the construction works.

## **7.2 Long term management and relocation of salvaged artefacts**

The relocation site for the Aboriginal artefacts which will be salvaged via the surface collection salvage program, salvage excavation and those previously recovered from the subsurface testing program (which are currently in temporary care of NGH Canberra office) would need to be agreed to by the Principal and RAPs and be outside the any areas proposed future impacts. A strategy for the long-term management of any items or material that are salvaged would be developed in consultation with the registered Aboriginal parties but may include options such as:

- a. Buried in accordance with Requirement 26 of the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW in a safe location away from development.
- b. Kept as a display in the school campus or for teaching purposes. This would require the completion of a Care Agreement under Section 85 of the NPW Act.
- c. Consultation with the RAPs regarding their preference for storage and management of any collected artefacts should continue.

The site/s for the relocation of salvaged Aboriginal objects would be noted by submission of site card/s to the Aboriginal Heritage Information Management System (AHIMS) and/or undertaken in line with an approved Care Agreement under Section 85 of the NPW Act.

If the material is buried a new AHIMS sites card would be submitted as legally required within 3 months from the reburial/relocation of the salvaged Aboriginal objects.

An Aboriginal Site Impact Recording Form must be completed and submitted to AHIMS following harm for each site collected or destroyed from salvage and/or construction works. Representatives from the RAPs (as selected by the Principal and/or Head contractor) would be provided with the opportunity to assist the Project Archaeologist with the salvage program and the relocation of the salvaged objects. Generally, a minimum of two representatives from the RAPs would be invited to participate in the salvage program and the relocation of the Aboriginal salvaged objects. If Aboriginal representatives are available to participate in the relocation of the Aboriginal salvaged objects, they will be asked to conduct a ceremony (i.e. smoking) for the relocation site and artefacts if they wish to and if it is safe to do so. If representatives from the RAPs are not available to participate and all reasonable opportunities

have been afforded, the salvage and relocation of Aboriginal objects, would continue as scheduled by the Project Archaeologist.

Following the relocation of the Aboriginal objects, which have been salvaged as per the Development Consent, the site location/s will also be provided to the Principal and Head contractor to ensure the site/s are protected during the construction and operation of the Project. Following the relocation of salvaged Aboriginal objects, the mapping within the ACHMSP would be updated to show and/or include the relocation site/s. It is intended that this would occur within 3 months of the relocation of the sites. A minimum 5 m buffer zone is required to be placed and delineated around the artefact relocation site/s if burial occurs during the construction phase to ensure they won't be impacted into the future.

It may be possible post construction, during the landscaping phase of works for the Project, to determine with the RAPs and Principal a suitable location to install a small concrete box (with or without an open base) which can be sealed over with a concrete lid for the long term storage of cultural material within the Project Area. This location would be incorporated into a garden bed surrounding by plantings of native vegetation and may include a plaque or information board providing acknowledgement of Country. These measures would need to be considered and discussed with the RAPs to ensure their agreement. The images below show one possibility incorporation of such an option for reburial of cultural material within the Project area. This option would ensure that into the future there is a location within the school grounds which can be used for the long term storage of cultural material that won't be impacted by future works.



Plate 1. Image of the sequence of possible reburial option within the grounds of the Project which shows a concrete box and lid which can be incorporated into a garden area.

### **7.3 Ground disturbance protocol**

A ground disturbance permit process will be implemented during construction. The ground disturbance permit process is integral to communicate the distinction between Aboriginal heritage sites which must be avoided and the ground disturbance footprints in which Head contractor will be working.

The ground disturbance permit process will be managed by the Health, Safety and Environment (HSE) Manager and/or the Work Health, Safety and Environment Officer (WHSE Officer). The steps that will be implemented are detailed below:

- Contractors are informed in their contract and site induction that all ground disturbing activities require them to obtain a ground disturbance permit prior to starting the work.

- The ground disturbance permit must be submitted to the HSE Manager / WHSE Officer via email at least 48 hours before the work is commenced.
- The HSE Manager /WHSE Officer will compare the proposed ground disturbance area to the project footprint detailed in the current approved design and the heritage shape files.
- The HSE Manager/ WHSE Officer will visit the site to ensure the delineation of the Project Area and any *in situ* heritage sites in the vicinity of the proposed ground disturbance permit which are not proposed for impacts.
- The HSE Manager/ WHSE Officer will either issue the permit unamended or contact the contractor for further clarification.
- Once the permit has been issued, the Head contractor may commence ground works as per their contract.
- Once the work has been completed (date specified in the permit), the HSE Manager/ WHSE Officer may be required to inspect the site, request any additional clean up or remediation activities and sign-off that the conditions of the permit have been met.
- If no *in situ* Aboriginal sites are present within the vicinity (within 50 m) of the works area the permit may be approved without a site inspection.

An example of a ground disturbance permit form is provided in Appendix E.1.

## **7.4 Heritage site status database**

Prior to any works occurring onsite a database of all previously recorded Aboriginal heritage sites will be established. This database will include a GIS shape file showing the location and status of all recorded sites and as a minimum the following information:

- AHIMS number of the site;
- Site name;
- Development Consent for the site;
- Status of the site;
- Date status of site updated on AHIMS; and
- Comments.

This database will be updated by the WHSE Officer within 1 month following the salvage of a site and submission of impact site cards and/or if any new site cards within the Project area are submitted to AHIMS. An example of the Heritage site statue database for this Project is provided in Appendix E.2. The WHSE Officer and site survey team coordinate access, updating and status of the shape files.

## **7.5 Protection and delineation of Aboriginal heritage sites**

The boundaries of the Project area approved for disturbances will be clearly marked with temporary fencing installed around the school site during construction to ensure all works are within the approved area. This will ensure no impacts to the site Jindabyne Campus AFT 2 and any other Aboriginal cultural heritage sites that may be located outside of the areas of approved works.



Aboriginal cultural heritage sites within the Project area that are not be disturbed will be demarcated (by the Head contractor) using the appropriate coloured barricading or bunting for environmentally sensitive area in accordance with the CEMP and signed as no-go zones. These 'no go' exclusion zones will be in place for the duration of construction unless salvage works as noted in this plan and as approved under the Development Consent has been undertaken at the Aboriginal sites which will be impacted.

Temporary fencing will be installed within 24 hours around the immediate location of any unexpected find and stay in place until an appropriate outcome is determined in line with the unexpected find procedure as outline in Appendix D.

Specifically, Jindabyne Campus AFT 2 will not be impacted by the works and the Project boundary fencing near this site will be marked as a no-go zone. The fencing of the area and the Aboriginal sites which are not approved to be impacted will be undertaken a minimum of 7 days prior to any construction works occurring.

A ground disturbance permit process as noted in Section 7.3 will be implemented during construction. The ground disturbance permit process is integral to communicate the distinction between heritage sites which must be avoided and the ground disturbance footprints in which construction contractors will be working.

## **7.6 Salvage collection and salvage excavation**

Salvage collection of surface artefacts will be carried out prior to construction occurring at the following Aboriginal sites if they are unable to be avoided by works:

- AHIMS# 62-1-0385 Jindabyne Campus AFT 1/ PAD 1
- AHIMS# 62-1-0386 Jindabyne Campus AFT 3/ PAD 3
- AHIMS# 62-1-0387 Jindabyne Campus AFT 4

The salvage collection methodology is outlined in Appendix C.

Salvage excavation will be carried out prior to construction occurring at the following Aboriginal site if it is unable to be avoided by works:

- AHIMS# 62-1-0385 Jindabyne Campus AFT 1/ PAD 1

The salvage excavation methodology is outlined in Appendix C.

The findings of any salvage works will be reported on with a copy of the report provided to all RAPs and Heritage NSW.



## 8. Compliance Management

### 8.1 Structure and Responsibility

The organisational structure and overall roles and responsibilities, including those for contractors and sub-contractors, are outlined in the CEMP. Specific responsibilities for the implementation of Aboriginal Heritage controls in this document are summarised in Table 7-1 and the roles and responsibilities relevant to this sub plan are outlines in Table 8-1 below. Further details regarding specific responsibilities for the implementation of environmental and heritage controls are detailed in the CEMP.

Table 8-1 Roles and responsibilities

Role	Responsibility	Authority and accountability
Project Manager	<ul style="list-style-type: none"> <li>• Ensure resources are made available to enable works to comply with CEMP and other environmental management requirements.</li> <li>• Ensure that all procedures are followed adequately.</li> <li>• Ensure appropriate approvals and licences are held.</li> <li>• Ensure all staff and contractors are aware of environmental compliance requirements and environmental controls.</li> <li>• Responsible for reporting incidents and non-compliance with the conditions of consent.</li> <li>• Ensure all non-conformance events are investigated and corrected.</li> </ul>	<ul style="list-style-type: none"> <li>• Order Stop-work for an activity that may cause material or environmental harm.</li> <li>• Order Stop work or otherwise mitigate effects of an activity that is causing harm to Aboriginal objects and/or sites.</li> <li>• Release of environmental hold points, if required.</li> <li>• Recommend Stop-work for an activity that may cause harm to an Aboriginal object.</li> </ul>
Head contractor	<ul style="list-style-type: none"> <li>• Ensure contractors are working in accordance with the requirements of the CEMP, as required under the construction contract.</li> <li>• Undertake site visits during construction to monitor compliance with CEMP requirements.</li> <li>• Report and raise any issues that arise that may have an environmental impact.</li> <li>• Report and raise the discovery of any Aboriginal heritage objects or places and cease work until the matter has been addressed.</li> </ul>	<ul style="list-style-type: none"> <li>• Report any issues that may have the potential to cause material or environmental harm.</li> <li>• Report any incidents or near-misses that may impact on the environment or breach conditions set-out in this sub plan of the CEMP.</li> <li>• Recommend Stop-work for an activity that may cause harm to Aboriginal objects</li> </ul>

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Role	Responsibility	Authority and accountability
	<ul style="list-style-type: none"> <li>• Ensure that any changes to the schedule of works are communicated to the WHSE OFFICER /HSE in a timely manner, if environmental aspects are likely to become affected.</li> <li>• Ensure works proceed with all necessary approvals.</li> <li>• Ensure that all site personnel and subcontractors are aware of their responsibilities.</li> </ul>	
Health Safety and Environment (HSE) Advisor and Work Health, Safety and Environment Officer (WHSE Officer )	<ul style="list-style-type: none"> <li>• Maintaining all environmental management documents.</li> <li>• Identifying where environmental measures are not meeting the targets and where improvements can be achieved.</li> <li>• Monitoring and reporting environmental compliance.</li> <li>• Reviewing Project environmental documents.</li> <li>• Reporting of incidents.</li> <li>• Motivate compliance with this sub plan</li> <li>• Confirm that all necessary cultural heritage controls are implemented and maintained for the duration of the construction works</li> <li>• Assist with investigation of all non-conformance events and ensure any such events are investigated and corrected.</li> </ul>	<ul style="list-style-type: none"> <li>• Recommend Stop-work for an activity that may cause material or environmental harm.</li> <li>• Release of environmental hold points, if required.</li> <li>• Recommend Stop-work for an activity that may cause harm to Aboriginal objects</li> </ul>
Employees and Subcontractors	<ul style="list-style-type: none"> <li>• Stop work immediately when an unexpected heritage find is encountered. Cordon off area until SEA advises that work can recommence.</li> </ul>	<ul style="list-style-type: none"> <li>• Follow the unexpected find procedure</li> </ul>
Project archaeologist	<ul style="list-style-type: none"> <li>• Acting as an environmental subcontractor, specialist work as required.</li> <li>• Operate as instructed by the Project Manager/ Principal / Head contractor in compliance with all environmental requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• Undertake salvage works of sites as approved in the Development Consent and subsequent reporting, including impact site cards if applicable.</li> <li>• Inspection of unexpected finds as required.</li> </ul>

## **8.2 Training**

To ensure that this ACHMSP is effectively implemented, each level of management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this plan. The Health Safety and Environment (HSE) personnel will coordinate the environmental training in conjunction with other training and development activities (e.g., safety). A record of this training will be maintained by the HSE personnel.

All employees, contractors, sub-contractors and utility staff working on site will receive Aboriginal Cultural Heritage Awareness Training. It will be provided to all personnel in the form of an induction before they begin work on site. This training will address elements related to Aboriginal cultural heritage management including:

- Aboriginal Heritage obligations under the Project Development Consent and Relevant legislation
- Existence and requirements of this management plan
- Roles and responsibilities for Aboriginal cultural heritage management
- Location of any identified no-go areas and management measures
- Procedure to follow in the event of an unexpected Aboriginal cultural heritage item find or discovery of human remains during works

Where possible any training and/or cultural awareness will involve the Registered Aboriginal Parties and/or the local Aboriginal community. and provided to before commencing work on-site.

Targeted training in the form of toolbox talks or specific training will also be provided to personnel with a key role in Aboriginal heritage management. Examples of training topics include:

- Unexpected finds procedure
- No-go areas around heritage items.

A refresher induction and/or additional training will be implemented following any incident that involves Aboriginal heritage. If future revision of the ACHMSP occurs consideration must be given as to whether a refresher induction and/or additional training will be undertaken.

Further information regarding staff induction and training are outlined in the CEMP.

## **8.3 Inspections and Monitoring**

Periodic inspection of the Aboriginal heritage site/s located within the Project area which are not approved to be impacted, as per the Development Consent and noted in this subplan, will take place for the duration of construction of the Project. The Aboriginal site/s which are not approved to be impacted, will be identified by the Project Archaeologist and/or the WHSE Officer and marked by fencing to ensure there are no inadvertent impacts during the construction of the Project. The fencing of the Aboriginal site/s which are not approved to be impacted will be undertaken a minimum of 7 days prior to any construction works occurring. Inspection of these sites will occur fortnightly during construction by the WHSE Officer. Requirements and responsibilities in relation to monitoring and inspections are documented in the CEMP.

The objective of inspections and monitoring will be to validate the impacts predicted for the Project, to measure the effectiveness of the heritage controls and implementation of the CEMP, and to address specific obligations. The Principal and Head contractor will respond in a timely manner to any requests relating to monitoring or the effectiveness of heritage/environmental controls and their implementation raised by NSW Government Agencies.

The report provided by the Project Archaeologist following the completion of the salvage programme would also provide comment on the effectiveness of heritage controls relevant to the salvage programme.

Any stone artefacts collected and/ or recovered during the salvage program will be relocated and buried at a safe location outside the approved development footprint within the Project area, or other long term management option as agreed to by the registered Aboriginal parties. The relocation site/s of the salvaged stone artefacts and subsurface artefacts recovered during the subsurface testing program will also be subject to fencing, monitoring and inspection to ensure there are no inadvertent impacts during the construction of the Jindabyne Education Campus. Inspection of the relocation site/s will occur fortnight during construction by the WHSE Officer . All inspections of heritage sites will be undertaken following a reporting checklist.

## **8.4 Auditing**

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

Aboriginal heritage must be included within any major environmental audit of impacts undertaken during the construction and operation phases of works for the Project.

Audit requirements are detailed in the CEMP and must comply with the Development Consent Schedule 3 Conditions C40 to C45.

## **8.5 Contingency Plan and Reporting**

Contingency plan and reporting requirements and responsibilities are documented in the CEMP and would comply with the Development Consent.

### **8.5.1 Contingency Plan and Reporting Human Remains**

If any human remains or suspected human remains are discovered during any works, all activity in the area must cease immediately and the Unexpected Finds Protocol which is provided in Appendix D of this sub plan must be followed to report the find. The NSW Police must be notified immediately.

Details of the location and nature of the human remains must be provided to the relevant local police (Jindabyne Police Station). If there are reasonable grounds to believe that the remains are Aboriginal, Heritage NSW must also be contacted as soon as practicable, and you must provide any available details of the remains and their location. Heritage NSW Environment Line can be contacted on 131 555. If the find is determined to be Aboriginal Heritage NSW will provide advice on any additional reporting requirements. Works at the immediate location of the find may only recommence with the written approval of the Planning Secretary.

### **8.5.2 Contingency Plan and Reporting Unexpected Finds**

If any previously unidentified heritage items are found the Unexpected Finds Protocol which is provided in Appendix D of this sub plan must be followed to report the find. The Unexpected Finds Protocol as noted in the Development Consent Schedule 2 Conditions C29 as noted below must be followed.

In the event that surface disturbance identifies a new Aboriginal object:

- a) all works must halt in the immediate area to prevent any further impacts to the object(s);

- b) a suitably qualified archaeologist and the registered Aboriginal representatives must be contacted to determine the significance of the objects;
- c) the site is to be registered in the Aboriginal Heritage Information Management System (AHIMS) which is managed by Heritage NSW and the management outcome for the site included in the information provided to AHIMS;
- d) the Applicant must consult with the Aboriginal community representatives, the archaeologists and Heritage NSW to develop and implement management strategies for all objects/sites; and
- e) works may only recommence with the written approval of the Planning Secretary.

## **8.6 Incident and Non- Compliance Notification and Reporting**

Non-compliance is defined in the Development Consent as an occurrence, set of circumstances or development that is a breach of the consent but is not an incident.

An incident is defined in the Development Consent a set of circumstances that causes or threatens to cause material harm and which may or may not be, or cause, a non-compliance. Material Harm is harm that:

- involves actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial; or
- results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000 (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment)

Instances of non-compliance and/or incident notification will be recorded and raised with the relevant authorities as per the Development Consent conditions A28 to A33. These conditions note that the Planning Secretary must be notified by email through the major projects portal immediately after one becomes aware of an incident and within seven (7) days after a non- compliance issue.

The notification to the Planning Secretary via the major projects portal must identify the development (including the development application number) and set out the location and nature of the incident. A non-compliance that has been notified as an incident does not need to also be notified as a non-compliance.

Subsequent notification requirements must be given, and reports submitted in accordance with the requirements set out in Development Consent Appendix 2 which have the steps outlined below for Heritage non- compliance and incidents.

1. Written incident notification must be submitted to the Planning Secretary by email through the major projects portal within seven (7) days after the incident is known about. Written notification of an incident must identify the development and application number and the following items:
  - Provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident);
  - Identify how the incident was detected and when you became aware of the incident;
  - Identify any actual or potential non-compliance with the Development Consent;
  - Describe what immediate steps were taken in relation to the incident and identify further action(s) that will be taken in relation to the incident; and



- Identify a project contact for further communication regarding the incident.
2. Within 30 days of the date on which the incident occurred (or as otherwise agreed to by the Planning Secretary), an incident report will be provided to the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary). The Incident Report must include:
- A summary of the incident;
  - Outcomes of an incident investigation, including identification of the cause of the incident;
  - Details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and
  - Details of any communication with other stakeholders regarding the incident.

## **9. Review and Improvement**

### **9.1 Continuous Improvement**

Continuous improvement of this sub plan will be achieved when opportunities for improvement are identified. Any proposed improvement and/or changes to this sub plan are required to be approved by the Planning Secretary prior to implementation.

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.

### **9.2 ACHMSP Update and Amendment**

During the Project, a hard copy of the most recent version of this sub plan will be stored at the main site compound. It is the responsibility of the Environmental Officer to ensure this hard copy is the most recent version and to remove older versions of the plan once they are superseded at the main site compound.

The processes and plans described in the CEMP may result in the need to update or revise this Plan. Any revision of the ACHMSP is to ensure it incorporates any recommended measures to improve the environmental performance of the development. Any proposed changes to this sub plan are required to be approved by the Planning Secretary prior to implementation.

A copy of the updated ACHMSP with any changes, once approved by the Planning Secretary, will be distributed to all relevant stakeholders in accordance with the approved document control procedure (refer to the CEMP) and to the RAPs (as noted in Section 4 of this Plan).

In the instance of any modification to the Development Consent which changes any element of this sub plan the ACHMSP will be reviewed within three (3) months and if revisions of the sub plan is required this sub plan will be submitted to the Planning Secretary for approval and comply with the Development Consent Schedule 2 condition A13 (Staging, Combining and Updating Strategies, Plans or Programs) and Condition A34 and A35 (Revision of Strategies, Plans and Programs).

In the instance of an incident report (Development Consent Schedule 2 condition A30) or an audit report (Development Consent Schedule 2 condition C41 or C42) which notes non-compliance for Heritage the ACHMSP will be reviewed within three (3) months and if revisions of the plan is required the revised sub plan will be submitted to the Planning Secretary for approval and comply with the Development Consent Schedule 2 Condition A34 and A35 (Revision of Strategies, Plans and Programs) and Development Consent Schedule 2 Condition A13 (Staging, Combining and Updating Strategies, Plans or Programs).

## **10. General Project Communications**

The CEMP and associated Community Consultation Plan (CCP) details the processes that will be used to keep the local community and relevant agencies informed about the operation and environmental performance of this Project. The main point of contact with DPE for this Project will be via the major projects portal at the website listed below.

<https://pp.planningportal.nsw.gov.au/major-projects/projects/new-education-campus-jindabyne-new-primary-and-high-school>

While a number of steps will be implemented in order to engage with the community and other stakeholders throughout the various stages of the development as detailed in the CEMP and CCP, one of the main portals for community engagement will be via the NSW Department of Education- School Infrastructure website. The website will be used to provide general updates as relevant about the progress of the Jindabyne Education Campus development. The website can be accessed at:

<https://www.schoolinfrastructure.nsw.gov.au/projects/j/jindabyne-education-campus.html>

The NSW Department of Education- School Infrastructure website for this Project will be regularly updated throughout all stages of the proposed development and include information such as:

- Layout and general overview of the development.
- How complaints about the development can be made and a complaints handling procedure.
- Contact details of the Proponent or online contact form.

A link to the Major Projects website is also provided, which contains information relating to:

- Assessments undertaken for the Project
- Current statutory approvals for the development.

The procedures for dispute resolution will be undertaken in accordance with the Complaint's Procedure which is detailed in the CEMP. All complaints received via post, phone, email or the project website during construction will be recorded and responded to. It is the intention of the Principal and Head contractor to maintain an open and clear relationship with all stakeholders to prevent complaints from arising. Should the resolution of a complaint not be able to be reached by both parties, following presentation of investigation results to the complainant, either party may refer the dispute to an independent mediator and/or follow the steps outlined in the complaints procedure as detailed in the CEMP.

## **11. References**

DECCW NSW 2010a, *Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales*.

DECCW NSW 2010b, *Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010*.

NGH Pty Ltd, 2021, *Aboriginal Cultural Heritage Assessment Jindabyne Education Campus Draft*, Unpublished report for Mecone.

NGH Pty Ltd, 2022a, *Aboriginal Cultural Heritage Assessment Jindabyne Education Campus*, Unpublished report for Mecone.

NGH Pty Ltd, 2022b, *Archaeological Technical Report Jindabyne Education Campus - Subsurface Testing Assessment*. Unpublished report for Mecone.

Mecone, 2021. *Environmental Impact Statement Jindabyne Education Campus (SSD 15788005)*, Prepared on behalf of NSW Department of Education.

Mecone, 2022, *Submissions Report New Education Campus at 207 Barry Way, Jindabyne SSD-15788005*, Prepared on behalf of NSW Department of Education.

OEH 2011, *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW*.

## **Appendix A Approved Layout of Development**