



EASTERN CREEK WASTE PROJECT
REVISED 16 MARCH 2017

ENVIRONMENTAL MANAGEMENT STRATEGY (EMS)
ABORIGINAL HERITAGE MANAGEMENT PLAN

Former QUARRY SITE AT OLD WALLGROVE ROAD EASTERN CREEK
MATERIALS PROCESSING CENTRE (MPC)
WASTE TRANSFER FACILITY associated with an adjacent
SOLID WASTE LANDFILL
Document Control

For controlled copies of this EMS the copy number is shown below and initialled in Red by Dial A Dump Industries Project Manager.

Reference Documents

Aboriginal Heritage Conservation Plan Consultant Dr J MacDonald dated November 2009 (**MacDonald**) annexed in Appendix A.



REVISION HISTORY

| Version | Date | Reasons for Change | Prepared By | Authorised by |
|----------------|-------------|---------------------------|--------------------|-----------------------|
| 1 | June 2011 | Initial commission | Legal | Group General Counsel |
| 2 | June 2012 | Review | Legal | Group General Counsel |
| 3 | July 2013 | Review | Legal | Group General Counsel |
| 4 | June 2014 | Review | Legal | Group General Counsel |
| 5 | March 2015 | Review | Legal | Group General Counsel |
| 6 | April 2016 | Review | Legal | Genesis Site Manager |
| 7 | March 2017 | Review | Legal | Group General Counsel |



1 ABORIGINAL HERITAGE MANAGEMENT PLAN

1.1 PROJECT APPROVAL CONDITIONS

An Aboriginal Heritage Management Plan is required to be prepared and implemented in accordance with Condition 62 of Schedule 3 of the Project Approval. Condition 62 is as follows.

*The Proponent shall prepare and implement an **Aboriginal Heritage Management Plan**, in consultation with the DECCW, and to the satisfaction of the Director-General. The Plan must:*

- a) Be submitted to the Director-General for approval prior to the commencement of construction;*
- b) Be prepared by a suitably qualified archaeologist;*
- c) Be consistent with the management principles defined in McDonald 2005;*
- d) Include a strategy for the salvage and long term management of salvaged objects;*
- e) Include procedures for topsoil stripping and sub-surface excavation works in areas of moderate sensitivity and supervision by a qualified archaeologist;*
- f) Identify procedures to be followed should previously unidentified objects be uncovered or additional impacts to sites be identified;*
- g) Measures to protect Aboriginal heritage values of those areas marked high sensitivity in McDonald 2005; and*
- h) Include a procedure for continued consultation with Aboriginal stakeholders.*

1.2 PURPOSE OF THIS PLAN

This Plan:

- details the management procedures for Aboriginal heritage within the Project area;
- details reporting requirements;
- implements measures in place to protect Aboriginal heritage values of those areas marked high archaeological sensitivity;
- presents a procedure for ongoing Aboriginal Consultation;
- describes the roles and responsibilities of key personnel in managing Aboriginal heritage sites and training all personnel on site.



1.3 BACKGROUND

As part of the Environmental Assessment an Aboriginal heritage assessment for the project was completed in July 2005, findings presented in the Jo McDonald Heritage Report. The Project was approved in 2009 (Project Approval 06_0139 dated 22 November 2009) and the initial construction of the site was completed in 2011.

During the initial construction surface artefacts were found in three locations to the north of the property. Since construction no relics have been found. On 17 March 2016 the NSW Department of Planning approved a Section 75W application to modify Project Approval 06_0139 in order to construct an additional Pre-Sort shed adjoining the existing MPC to improve efficiency of on-site operations.

1.4 NEW ELEMENTS OF THIS REVISED PLAN

- Demonstrate the proponents continued review of the projects Cultural Heritage objectives based on recommendations from internal and external audits.
- Demonstrate the proponents continued consultation with the Local Aboriginal Community and continued commitment to the cultural integrity of the site.
- Relevance of the Policy, objectives and targets to current and future conditions; and information and concerns of stakeholders.
- Future development considerations.

1.5 ACHIEVEMENT OF REQUIREMENTS

Table 1.1 lists the consent conditions for the preparation of an Aboriginal Heritage Management Plan, provides a summary of the current compliance status and provides recommendations to achieve compliance and to improve the presentation of the Plan.



Table 1.1. Aboriginal Heritage Management Plan Compliance Review (Condition 62 of Schedule 3).

| CONSENT REQUIREMENTS | COMPLIANCE STATUS |
|---|--|
| <i>The Proponent shall prepare and implement an Aboriginal Heritage Management Plan, in consultation with the DECCW, and to the satisfaction of the Director-General. The Plan must:</i> <i>a) Be submitted to the Director-General for approval prior to the commencement of construction;</i> | Complies Prepared in consultation with DECCW Refer Consultation Letter |
| <i>b) Be prepared by a suitably qualified archaeologist;</i> | Complies Refer Section 2.2 of this Management Plan; and MacDonald |
| <i>c) Be consistent with the management principles defined in McDonald 2005;</i> | Complies Refer Section 1 of MacDonald |
| <i>d) Include a strategy for the salvage and long term management of salvaged objects;</i> | Complies Refer: Section 2.2 of this Management Plan; and Section 7 of MacDonald |
| <i>e) Include procedures for topsoil stripping and sub-surface excavation works in areas of moderate sensitivity and supervision by a qualified archaeologist;</i> | Complies Refer Section 2.2 of this Management Plan; and Section 7 of MacDonald |
| <i>f) Identify procedures to be followed should previously unidentified objects be uncovered or additional impacts to sites be identified;</i> | Complies Refer Section 2.2 of this Management Plan; and Section 7 of MacDonald |
| <i>g) Measures to protect Aboriginal heritage values of those areas marked high sensitivity in McDonald 2005; and</i> | Complies Refer Section 2.2 of this Management Plan; and Sections 7 of MacDonald |
| <i>h) Include a procedure for continued consultation with Aboriginal stakeholders.</i> | Complies Refer Sections 2.2 & 12 of this Management Plan; and Section 7 of MacDonald |



Table 1.2 reviews whether the preparation of the Aboriginal Heritage Management Plan has been consistent with the requirements of Condition 2 of Schedule 5 of the Project Approval. It provides a summary of the current compliance status and provides recommendations to achieve compliance and to improve the presentation of the Plan.

Table 1.2. Aboriginal Heritage Management Plan Compliance Review (Condition 2 of Schedule 5).

| CONSENT REQUIREMENTS | COMPLIANCE STATUS |
|--|---|
| <i>prepared in accordance with any relevant guidelines.</i> | Complies Refer Section 1 of MacDonald |
| <i>a) Detailed baseline data;</i> | Complies Refer Sections 3, 4 & 5 of MacDonald |
| <i>b) A description of;</i> <ul style="list-style-type: none"> <i>The relevant statutory requirements (including any relevant approval, licence or lease conditions);</i> <i>Any relevant limits or performance measures/criteria;</i> <i>The specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;</i> | Complies Refer Sections 1.2 & 3.1 of this Management Plant; and Sections 1, 3 & 6 of MacDonald |
| <i>c) A description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</i> | Complies Refer: Section 3.1 of this Management Plant; and Sections 1, 3, 6 & 7 of MacDonald |



| CONSENT REQUIREMENTS | COMPLIANCE STATUS |
|--|---|
| d) A program to monitor and report any; <ul style="list-style-type: none">• Incidents;• Complaints;• Non-compliances with statutory requirements; and• Exceedances of the impact assessment criteria and/or performance criteria; and | Complies Refer Sections 4, 5, 8, 11, 13, 14 & 15 of this Management Plan |
| e) A protocol for periodic review of the plan. | Complies Refer Sections 6, 7, 9, 10 of this Management Plan |

2 ABORIGINAL HERITAGE CONSERVATION

2.1 CRITERIA

The relevant criteria for Management and Conservation of Aboriginal Heritage is set out in conditions 60 and 61 of Consolidated Approval 06_0239 dated October 2013.

2.2 MANAGEMENT AND MITIGATION MEASURES

Jo McDonald Cultural Heritage Management Pty Ltd prepared an Aboriginal Heritage Management Plan in consultation with DECCW (refer Consultation Letter annexed in Appendix C).

The actions and strategies from McDonald have been adopted.

In the event that previously unrecorded relics (Indigenous heritage items) are encountered during any future construction on site, works will cease immediately at that location and the NSW Heritage Office will be notified and advice sought as to the appropriate course of action. The Proponent will be guided on the salvage and long term management of salvaged object.

The relevant areas of sensitivity are as follows (refer Figure 5 below):



- Zone 3 is the quarry pit and the MPC area – highly disturbed with no aboriginal heritage concerns.
- Zone 2 is the area where cut and fill operations took place – where no further archaeological investigation are warranted.
- Zone 1 is the Conservation Areas shown on the Plan and are deemed to be of 'high sensitivity'.

In respect to Zone 1, the following measures have been taken: :

- The area is clearly identified on maps and plans and also on site by boundary flags and perimeter fencing..
- Access is restricted.
- Induction of all contractors, workers and employees on site as to their legal responsibilities as to site damage and or destruction.
- Adequate briefing of employees on site as to the nature of aboriginal heritage material which may be uncovered.
- Briefing all contractors on legal requirements regarding uncovered skeletal material.

Any management decisions in relation to the areas of high sensitivity are carried out in consultation with the Local Aboriginal Community.

As part of the project induction process a specific work direction is issued by the Site Project Manager to all relevant Sub-Contractors (including relevant plans) prescribing that NO ACCESS be permitted at any time to the areas of high sensitivity, except for those activities specifically permitted and supervised by the SPM.

Figure 5: Assessed archaeological sensitivity zoning within the DAD Industries land (from JMcD CHM 2002, 2005). The non-hatched areas are Zone 3.





2.3 MONITORING AND COMPLIANCE REPORTING

The Site Project Manager monitors the site daily ensuring all areas of high sensitivity are secured and provides a weekly report to the Landowner.

2.4 CONTINGENCY MEASURES

In the event that the perimeter of the High Sensitivity Area is breached then the Site Project Manager will take immediate steps to reprimand the contractor.

- The Site Project Manager shall monitor the site daily and provide a weekly report to the Landowner on the following,
 - any breaches in work directions or relevant activities (and performance) conducted within the areas of high sensitivity;
 - any recommendations of ways to improve the environmental performance of the works over time.

Any contingency measures developed by the landowner would be done in consultation with the Local Aboriginal Community.

2.5 MANAGEMENT PROTOCOLS FOR ZONE 1

| Management Issue | Desired Outcome | Actions and Strategies |
|--|---|---|
| Cultural Heritage The subject land has identified areas of cultural and scientific values which are to be retained in the areas referred to as Zone 1. All Aboriginal sites, objects and places are protected under the National Parks and Wildlife Act 1974. | Cultural features are to be conserved and managed in accordance with their assessed significance. Interpretation and education will ensure that inadvertent damage to the place and/or collection of artefacts/objects does not occur. | Consult and involve Aboriginal custodians in all aspects of management of Aboriginal sites, places and values. No topsoil stripping or excavation can occur in this area without further assessment. |



| | | |
|---|--|---|
| This Plan provides for ongoing involvements of Aboriginal custodians in the management of the cultural heritage. | | |
| Developable Lands The Waste Processing Centre and associated infrastructure is within lands which have been previously highly disturbed (Zone 3). These lands are unimpeded by heritage concerns. | The conservation area must be fenced. | Access to the conservation areas should be limited and managed appropriately. There are no further management requirements relating to Aboriginal cultural heritage outside the conservation area. |
| Conservation Areas The primary management issues is to ensure that proposed future uses of the conservation area do not impact on its conservation value over time. | Disturbance to the conservation areas should be minimised and areas well maintained. Interpretation and education would ensure that inadvertent damage to the places and/or collection of artefacts/objects does not occur. | The conservation area should be fenced and access to these areas by all personnel should be limited. Trail bike usage in the area has been stopped. Recreational activities should be passive only. |
| Control of Exotic Fauna Identify and control feral animals likely to be in the conservation areas. | The impact of pest animals on the conservation area is minimised. | Domesticated and other exotic animals should be managed with appropriate control methods. Rabbit populations should be controlled because of the damage that their burrows cause to archaeological deposits. |
| Control of exotic and non-indigenous flora Under the Noxious Weeds Act 1993, declared noxious weeds must be controlled. The use of herbicide is permitted, but the removal of plants by the digging out of roots or any activity which would impact on the ground surface should be avoided. | The impact of exotic and non-indigenous plant species on native flora is minimised. | Use of machinery and excavation of topsoil are to be avoided. Appropriate control methods include checking the conservation area for weed invasion and regrowth and treatment of any outbreaks. Removal of blackberries should be done with a combination of herbicides and hand clearance. |
| Restoration of Vegetation Re-vegetation zones many impact on sensitive archaeological locations. | Restored areas should contain native vegetation with a structure and species diversity appropriate to the SEPP59 lands. | Natural regeneration is the preferred method of restoration. |



2.5 MANAGEMENT PROTOCOLS FOR ZONE 2

In the construction of the Materials Processing Centre in Zone 2 no archaeological relics were found. The impacts of the zone are no longer considered major enough to warrant further archaeological investigation, or the supervision of an archaeologist.

As construction is complete, zone 2 is mainly left to revegetate, until future development takes place. If more extensive development proposals are considered in the future, zone 2 areas will require further assessment.

For any future works occurring in zone 2, the Site Project Manager shall monitor these works and, in the event that previously unrecorded relics (Indigenous heritage items) are encountered, works will cease immediately and the NSW Heritage Office will be notified and advice sought as to the appropriate course of action.

3 CULTURAL AWARENESS, TRAINING AND COMPETENCY

3.1 STAFF TRAINING (Benchmark Table BM 39)

Training forms an integral part of ongoing Site management.

All personnel and contractors at the DADI Waste Facility Site will undergo Cultural Induction Training before being allowed to commence work on site.

Cultural Awareness training is conducted regularly and will be undertaken by all staff and permanent full-time contractors.

The training includes:

- the environment and community context within which the DADI Waste Facility operates;



- the Cultural policies and the importance of conformance;
- relevant legal and other requirements;
- the significant Cultural aspects and impacts associated with the operation and relevant operational controls;
- their roles and responsibilities in achieving conformance with the Cultural policies and requirements of the relevant EMS, including emergency preparedness and response requirements;
- the potential consequences of non-compliance with Cultural policy and Cultural requirements;
- community involvement/relations; and cultural awareness.

Employees and permanent full-time contractors undergo specific training undertaken as toolbox talks for relevant personnel.

This type of training is provided on an as-needed basis, for example, following the identification of a new risk or Cultural risk, relevant changes in legislation or a change in operations.

The Group Operations Manager will oversee the identification of Cultural awareness training needs of personnel.

The responsibility for co-ordination of Cultural training for the personnel is vested in the Group Operations Manager and Site Project Manager.

These responsibilities include development of training modules and toolbox talks for any operations outside of the perimeter of the Project area that may potentially result in significant Cultural impacts.

Cultural training is incorporated into the broader training program for the site including health, safety and operational training.



Training module documentation and records of all training provided shall be maintained in the DADI electronic filing system,

The effectiveness of training modules and sessions shall be periodically reviewed and the training modules updated as required.

The Site Operations Manager provides all new staff with suitable training and all existing staff undergo an annual refresher course, if required.

A record of training and safety meetings is maintained as an on-site register which if necessary will be open for examination by OEH.

4 CULTURAL AWARENESS MONITORING, CORRECTIVE ACTION AND AUDITS

4.1 CULTURAL MONITORING

Cultural monitoring to determine conformance of the DADI Operations with the Aboriginal Heritage Management Plan will be managed by the Site Operations Manager.

Monitoring of high archaeological sensitivity areas is undertaken by DADI personnel in accordance with the Cultural Monitoring Program and individual Management plans and programs prepared in accordance with the Development Consent Conditions.

Monthly photo audits are undertaken to ensure the integrity of areas of high archaeological sensitivity is maintained. A schedule of Cultural monitoring undertaken is also contained within the EMS along with a Cultural monitoring site location plan.

In the event of a non-conformance the Site Manager and the Group Operations Manager are to investigate the cause of the non-conformance and recommend corrective and/or preventative action.



The effectiveness of the corrective and/or preventative action is to be assessed by analysis of the next available monitoring results and during the next monthly site inspection.

5 INSPECTIONS

Regular inspections of the DADI Facility Site operations are conducted.

Site inspections are conducted by the Site Operations Manager or his/her delegate and the inspection results recorded on the inspection form.

Any non-conformances are to be recorded on the inspection form and the cause of the non-conformance investigated by the Site Operations Manager.

Corrective and/or preventative action is to be recommended by the person undertaking the inspection and the effectiveness of the corrective and/or preventative action assessed at the next monthly site inspection.

The Site Operations Manager will report any significant non-conformances arising from site inspections to the Group Operations Manager and General Manager.

All records will be held and maintained as part of the electronic version of the EMS.

6 INTERNAL AUDITS

Internal EMS audits are undertaken in the form of the Annual Environmental Review ('**AER**'). The AER is conducted in the interlocutory years between the required external audits as per Schedule 5, Condition 5 and 7 of the project consent. The AER assesses whether the EMS has been properly implemented and maintained and conforms to the Cultural policy, objectives and targets of DADI Executive Management Committee.



The results are communicated to senior management and employees in accordance with the EMS Communication Procedures.

7 EXTERNAL AUDITS

Independent audits of the operation were conducted within six months of commencement of Operations in accordance with Schedule 5, Condition 7 of the project consent.

Thereafter external audits are conducted every 2 years unless the Director General of Planning NSW directs otherwise.

External auditors are to be selected on the basis of their understanding of Cultural management principles waste processing and landfill operations.

The selection of external auditors will be the responsibility of the DADI Executive Management Committee Manager and the appointment duties and tasks of the auditors must satisfy the criteria and requirements set out in set out Condition 7 of the Schedule 5 of the Development Consent.

Actions and recommendations from external audits will be communicated to senior management and employees in accordance with relevant EMS communication procedures.

To date, the Eastern Creek Waste Project has been deemed compliant on all Aboriginal Cultural Heritage conditions by external auditing bodies.

8 NON CONFORMITY, CORRECTIVE ACTION AND PREVENTATIVE ACTION

On receipt of an incident/complaint reporting form, site inspection form, hazard report or monitoring result that indicates a potential or actual non-conformance of the DADI Waste Facility with the relevant EMSs, the Divisional General Manager or Site Operations Manager is to undertake an investigation and recommend corrective or preventative action.



Details of the required action(s) are to be communicated to the relevant supervisor of the specific operations area and a copy of the communications kept with the investigation report.

The effectiveness of the requested action is to be assessed within one month of the non-conformance.

Corrective and preventative actions relating to Cultural aspects specifically identified within the Development Consents are addressed within the dedicated Cultural Management Plans and Programs as required by the Consents.

9 EMS RECORDS AND INFORMATION MANAGEMENT

A master copy of the EMSs including the Strategy, plans, procedures and supporting information is held in the office of the Managing Director and/Group General Counsel.

All EMS records are to be maintained in the appropriate location, as detailed throughout this document, in a legible form for a minimum period of four years.

The EMS is to be reviewed at least every two years and updated, as required.

10 REVIEW AND IMPROVEMENT

10.1 MANAGEMENT REVIEW

The review and revision of the EMS are to be undertaken by senior management not less than every two years.

The EMS review will include:

- review of audit findings;



- results of monitoring programs;
- achievement of objectives and targets;
- relevance of the Policy, objectives and targets to current and future conditions; and information and concerns of stakeholders.

10.2 STRATEGIC REVIEW

This Strategy will be reviewed, and revised as necessary, within three months of the completion of each AER in accordance with Condition 7 of the Schedule 5 of the Development Consent.

If any significant changes are made to the Strategy as part of one of these reviews, the revised Strategy will be provided to the DoP for approval.

11 REPORTING

An annual report as required by the Environment Protection Licence will be submitted by the license holder to DECCW.

The annual report will be submitted within 60 days of license renewal date and comprise up to date data and information including a summary of reported incidents and license non-compliances, complaints, remedial measures, cultural monitoring data (graphed as required), including groundwater, leachate, landfill gas, air (dust), noise, surface water etc.

The report will summarise, interpret and comment on all cultural monitoring data.

The complaints register should include:

- The date and time of complaint;
- The method of lodging the complaint (including telephone record, or correspondence);
- Personal details of the complainant if given or available;
- The nature of the complaint and if it is a repeat complaint; and



- The follow up action, remedial measures and copies of correspondence.

The Complaint Records Form must be maintained for a minimum of 3 years after receipt.

12 EXTERNAL COMMUNICATION

12.1 EXTERNAL STAKEHOLDERS

All external reporting of matters of Aboriginal Cultural Significance associated with the DADI Waste Facility, including the Annual Environmental Review (AER), shall be undertaken by the DADI Site Operations Manager

Aboriginal Stakeholder Groups are as follows,

- Deerubbin Local Aboriginal Land Council
- Darug Tribal Aboriginal Corporation
- Darug Custodial Aboriginal Corporation
- Darug Land Observations
- Darug Aboriginal Cultural Heritage Assessments

Communication with these stakeholders on cultural matters is to be undertaken when required.

The DADI Waste Facility Website is regularly maintained to provide the wider community with access to the DADI Waste Facility monitoring results, details of current activities, policies, environmental management plans and monitoring programs and any other information in relation to the site operation that may be considered of interest to the community.

It is the responsibility of the DADI Site Operations Manager to maintain the Website



12.2 MEDIA COMMUNICATION

Communication with the media is prohibited at the DADI Waste Facility without approval from the DADI Group Operations Manager.

12.3 ABORIGINAL LIAISON

Consultation with the local Aboriginal community groups will be continued by the dissemination of information on DADIs website <http://www.dadi.com.au/genesis-xero-waste-facility.html> .

13 COMPLAINTS MANAGEMENT AND DISPUTE RESOLUTION

13.1 COMPLAINTS MANAGEMENT

DADI maintains a community response line.

The DADI Site Operations Manager is responsible for ensuring that the currency and effectiveness of the service is maintained.

The existence of the community response line is advertised on the DADI Waste Facility website and the number for the Complaints Hotline is displayed on a sign at the entrance of the site.

Details are also provided on the DADI Waste Facility website. The Site Operations Manager is responsible for ensuring the Hotline is advertised on the website.

As a minimum, notification of complaints received via the community response line is to be provided by immediate SMS relay to the DADI Site Operations Manager.

Complaints and enquiries do not have to be received on the Hotline and may be received in any other form.



Any complaint or enquiry relating to environmental management or performance is to be relayed to the DADI Site Operations Manager and as soon as practical.

All employees are responsible for ensuring the prompt relaying of complaints.

The DADI Site Manager is responsible for ensuring that all complaints are appropriately investigated, actioned and that information relating to the enquiry is recorded and publicly available on the website..

The DADI Site Operations Manager is to communicate all complaints to the Operations Manager, Divisional; General Manager and the relevant site functional manager as soon as practical, but as a maximum on the next working day.

A summary of complaints received is to be reported in the Monthly Operations Report for the Site.

A summary of complaints received and actions taken are included in the Annual Environmental Review and the Annual Returns to the OEH and EPA, respectively.

A Complaints Register is updated as required and is available to the public on the DADI Waste Facility website.

15 FUTURE DEVELOPMENT CONSIDERATIONS

On 17 March 2016 the NSW Department of Planning approved a Section 75W application to modify Project Approval 06_0139 in order to construct an additional Pre-Sort shed adjoining the existing MPC to improve efficiency of on-site operations.

The construction of a Pre-Sort enclosure will improve functionality and efficiency of the existing operation, increasing productivity of the MPC and improving the amounts of recycled and reused material through improved extraction from exiting waste streams; further reducing landfill on site.



The Pre-Sort enclosure will be located west of the quarry void, next to the existing MPC centre. The site of construction is within the area classified as Zone 3, an area of low archaeological sensitivity. Zone 3 has been classified as developable, and without archaeological constraint. There is no requirement for further investigation in these areas.

14 DISPUTE RESOLUTION

14.1 COMMUNITY

In the event of a disagreement between DADI and a member of an Aboriginal community, the DADI Site Operations Manager will undertake the necessary liaison and communication to reach a resolution, which will involve an offer for a one on one meeting with representatives of the Community Group to discuss the issue.

In the case of a Complaint which is unable to be resolved to the satisfaction of the Complainant by the Site Operations Manager, one or more of the Aboriginal representative Group will be invited to consult in relation to each such complaint received and in relation to the relevant investigation and attenuation measures which are implemented as a result of that complaint.

The purpose of this is to ensure the presence of and involvement by one or more impartial persons in the process so that verification is available, if required.

A six monthly review of work procedures shall be undertaken in response to complaints or to issues raised by a complainant.

15 RESPONSE/ DISPUTES AND MEDIATION

The Site Operations Manager (SOM) (or his delegate) will respond to the complainant in each case outlining the measures taken (if any).



The Complaints Register will contain all written records of the complaints logs together with all relevant work directions and correspondence and file notes.

In the event that the Complainant is dissatisfied with the actions taken by Site Management the SOM will convene a mediation meeting to which the Complainant, a Community Representative and an External Consultant with expertise in the area of the complaint will be invited for the purposes of exploring the issues and of mediation and reaching resolution with the Complainant.

The Complaint Records Form (and related correspondence) must be maintained for a minimum of 3 years after receipt.

Unresolved complaints may be referred to the NSW Department of Planning.

There have been no complaints in relation to cultural heritage during the life of the Project.

ACCESS TO WEB-SITE INFORMATION

The relevant criteria is set out in condition 9 of Schedule 5 of Development Consent MP 06_0239 dated 22 November 2009.

The Complaints Hotline Number is 9832 3333

The Number is accessible 24 Hours per day.

Information that will be publically available on the Landowner's website (www.dadi.com.au/landfills) includes:

- The complaints hotline number **9832 3333**.
- A copy of all current statutory approvals.



- A copy of the current environmental management strategy and associated plans and programs.
- A summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under the conditions of this approval.
- A complaints register, which is to be updated on a monthly basis.
- A copy of any Annual Reviews (over the last 5 years).
- A copy of any Independent Environmental Audit, and the Proponent's response to the recommendations in any audit.
- Any other matter required by the Director-General.

New developments, new (or refined) work practices, complaints or other issues raised by the Residents Committee will be notified to the broader Community by display on the Company website.



*Dial A Dump Industries, Eastern Creek
Environmental Management Strategy (EMS)
Aboriginal Heritage Management Plan*

APPENDIX A

'DIAL A DUMP' INDUSTRIES HOLDINGS,
EASTERN CREEK

The LIGHT HORSE BUSINESS PARK
ABORIGINAL HERITAGE MANAGEMENT PLAN

November 2009



Report prepared on behalf of 'Dial a Dump' Industries Pty Ltd

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EXECUTIVE SUMMARY

This Aboriginal Heritage Management Plan (AHMP) has been prepared by Jo McDonald Cultural Heritage Management for Dial a Dump ('DAD') Industries and fulfills the Director General's requirements (under Part 3a of the Environmental Planning & Assessment Act) for this proposed development in regard to Aboriginal heritage.

The subject land contains a number of archaeological sites. As well as surface archaeological sites, several areas have been identified where surface artefacts are not visible but could be buried in soils (Potential Archaeological Deposits – or PADs). These PADs are assessed as having high archaeological sensitivity because of low levels of previous land use impact. The recorded surface sites and PAD areas have been identified as having cultural significance to Aboriginal people.

This AHMP identifies two designated conservation areas within the subject land. The AHMP has been prepared to ensure the protection of Aboriginal sites and landscapes within these conservation areas. It also outlines the management requirements for the conservation areas which are to be adhered to by all parties associated with development works and the use and maintenance of the conservation areas into the future.

Of major import to this AHMP are the following protocols:

- ⊕ All DAD Industry workers, developers and other workers should be inducted so that they know their cultural heritage responsibilities and the nature of archaeological material which is present within the conservation areas. A briefing by a qualified archaeologist would provide an appropriate induction.
- ⊕ The boundaries of the conservation areas should be fenced, and the fact that buried archaeological material, not visible at the surface, is within the conservation areas must be stressed.
- ⊕ No construction activity or any other future works which will impact on the soil should take place within the conservation areas without prior assessment by a qualified archaeologist.
- ⊕ Any management decisions made in relation to Aboriginal heritage must involve consultation with representatives of the Aboriginal community.
- ⊕ The proposed Light Horse Business Centre is mostly located within areas which have no heritage value (Zone 3); this is unconstrained by Indigenous heritage considerations.
- ⊕ There are a small number of infrastructure items and development impacts proposed in the large area of land which has moderate archaeological potential (Zone 2). These are not considered major enough impacts to warrant further archaeological investigation. More extensive development proposals in the future in these Zone 2 areas would require further assessment.

I. INTRODUCTION

Jo McDonald CHM was commissioned by Dial a Dump Industries (DAD Industries) to produce this Aboriginal Heritage Management Plan (AHMP). The plan is based on the recommendations of the Archaeological Assessment of Aboriginal sites within the SEPP 59 lands (JMcD CHM 2002), and the Heritage Conservation Strategy for Aboriginal sites within the Valad and Sargent's lands (Jo McDonald CHM 2005).

This Aboriginal Heritage Management Plan fulfills the Director General's Requirements under Part 3A of the Environmental Planning and Assessment Act. The Director-General's requirements specified that;

1. The Proponent shall not disturb those areas identified as High Sensitivity in McDonald 2005.
2. The Proponent shall prepare and implement an Aboriginal Heritage Management Plan, in consultation with the DECCW, and to the satisfaction of the Director-General. The Plan must:
 - a) be submitted to the Director-General for approval prior to the commencement of construction;
 - b) be prepared by a suitably qualified archaeologist;
 - c) be consistent with the management principles defined in JMcD CHM 2005;
 - d) include a strategy for the salvage and long term management of salvaged objects;
 - e) include procedures for topsoil stripping and sub-surface excavation works in areas of moderate sensitivity and supervision by a qualified archaeologist;
 - f) identify procedures to be followed should previously unidentified objects be uncovered or additional impacts to sites be identified;
 - g) measures to protect Aboriginal heritage values of those areas marked high sensitivity in McDonald 2005;
 - h) and include a procedure for continued consultation with Aboriginal stakeholders

2. THE SUBJECT LAND

The subject land comprises c.142 ha immediately south of the M4 Motorway. It is bounded to the south west by several sets of transmission lines and in the west by Archbold Rd. The land includes the former Pioneer Quarry.

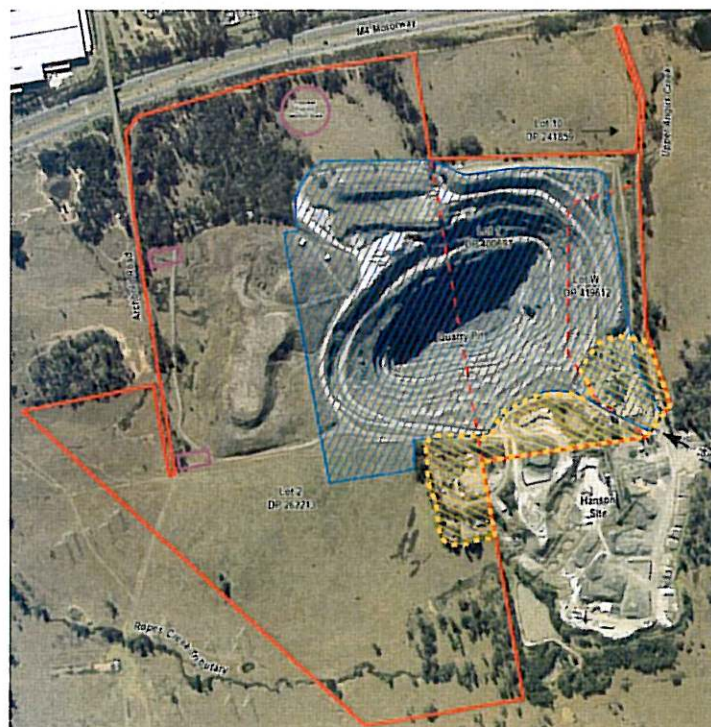
This Aboriginal Heritage Management Plan applies to the lands currently owned by DAD Industries. This includes the land formerly owned by Ray Fitzpatrick and purchased by the Valad group, the former Pioneer Quarry land and the former Tesrol land (JMcD CHM 2005).

Figure 1: Current DAD Industries holdings outlined in yellow showing the SEPP59 lands (red boundary: from JMcD CHM 2002, 2005).



3. BACKGROUND

The subject land has been purchased by DAD Industries for the development of the Light Horse Business Centre. This will involve the construction of a waste management facility and associated infrastructure. This will be focused on the former Pioneer Quarry. Access roads will be built to the south and west of the open cut quarry and through the northwestern corner of the subject land. A number of detention basins are also planned outside the Business Centre proper (Figure 2).

[illegible]

The subject land is covered by the State Environmental Planning Policy No. 59 (SEPP59). The SEPP59 Eastern Creek lands, including the current study area, were investigated by Blacktown Council, and a Strategic Land Use Study and Archaeological Assessment was prepared (JMcD CHM 2002). In 2005 a Heritage Conservation Strategy was prepared for the Valad group for lands which included the current study area (JMcD CHM 2005). The recommendations of the Archaeological Assessment (2002) and the Heritage Conservation Strategy (2005) apply to the DADI lands and are outlined here.

Since 2005 part of the area designated as archaeologically sensitive (Zone 1) by the Heritage Conservation Strategy has been subject to unauthorized works. A trench cut and subsequent infill by DAD Industries has destroyed a portion (c. 1ha in size) of the Zone 1 area in the south of the subject land (Figure 3). Outside the subject land to the east of this area another area of zone 1 land was also impacted by Hanson. These unauthorized works have impacted on any buried archaeological material which might have been contained within them. This work contravenes the previous recommendations and the *National Parks and Wildlife Act* (1974) which states that Aboriginal objects and places cannot be impacted without appropriate prior consents from the Director-General Department of Conservation, Climate Change and Water NSW (DECCW). This Management Plan will take into account these unauthorized works and reassess zoning of archaeological sensitivity accordingly.

Figure 4: Current Google Earth image showing disturbance in the southern part of the study area, which has altered the sensitivity zoning.



4. PREVIOUS FINDINGS AND RECOMMENDATIONS

An archaeological assessment of Aboriginal sites within the SEPP59 lands (Jo McDonald CHM 2002) identified one previously recorded site and two new sites within, or adjacent to, the current study area. Several areas of high archaeological sensitivity (Zone 1) were also defined.

As a result of the 2002 survey and a previous survey (Brayshaw & Haglund 1998), surface artefacts were recorded in three locations on, or adjacent to, the subject land. These locations were all fairly close together on dirt tracks to the north of the property (Table 1).

Site M4U4, recorded by Brayshaw & Haglund, comprised of three artefacts located over a distance of 270m on a fire trail just outside the property boundary. These artefacts were recorded on areas of exposure adjacent to intact vegetation. The associated area of intact vegetation within the study area was designated as an area of associated PAD (potential archaeological deposit), as buried archaeological material is likely to extend from observed surface artefacts into the subject land. Two parts of site M4U4, located just outside the study area within the boundaries of the M4 Motorway were fenced off (by the RTA) to protect them from impacts. One of the fences has since been damaged and a vehicle track now runs through the site.

Two new surface sites were recorded during the 2002 survey. These were:

RF/ISF1 Isolated find

This isolated find was located on a track which had been graded to c.20cm below natural ground level. One quartz bipolar fragment (good quality) measuring 1-1.5cm, was recorded. Blue metal, pottery and glass were located in the vicinity of the artefact.

RF/ISF2 Isolated find

This isolated find was located approximately 80m northeast of ISF1 on the graded track. One red lustrous silcrete longitudinally split broken flake (good quality) measuring 2.5-3cm was recorded.

Table 1: Recorded archaeological sites within (or adjacent to) the DADI lands.

| Site name | Site type | Easting | Northing | Topography | Surface Artefacts | Raw Material | Sensitivity Zone |
|-----------|-----------|--------------------|---------------------|------------|-------------------|--------------|------------------|
| M4U4 | OS | ² 98425 | ⁶² 58647 | Hill Slope | 3 | S | 3 |
| RF ISF1 | ISF | ² 98430 | ⁶² 58590 | Hill Slope | 1 | Q | 1 |
| RF ISF2 | ISF | ² 96474 | ⁶² 58610 | Hill Slope | 1 | S | 1 |

5. SIGNIFICANCE ASSESSMENT

Based on the presence of surface Aboriginal sites, levels of existing disturbance, and potential for buried archaeological material, the study area was divided into three zones of archaeological sensitivity (Table 2, Figure 5):

- ☉ Zone 1 has high archaeological sensitivity;
- ☉ Zone 2 has moderate archaeological sensitivity;
- ☉ Zone 3 has low archaeological sensitivity.

Two of the recorded archaeological sites were recorded within Zone 1 areas, and one just outside the study area in a disturbed Zone 3 context (Table 1). The extent of Zone 1 in the south of the DADI land (Figure 5) has been revised downwards because of the works along the southern creek line (after 2005) which have disturbed soil deposits and any archaeological material within them (compare with Jo McDonald CHM 2002 and 2005). Based on this more recent impact – the sensitivity Zones were recalculated (Table 2).

Figure 5: Assessed archaeological sensitivity zoning within the DAD Industries land (from JMcD CHM 2002, 2005). The non-hatched areas are Zone 3.

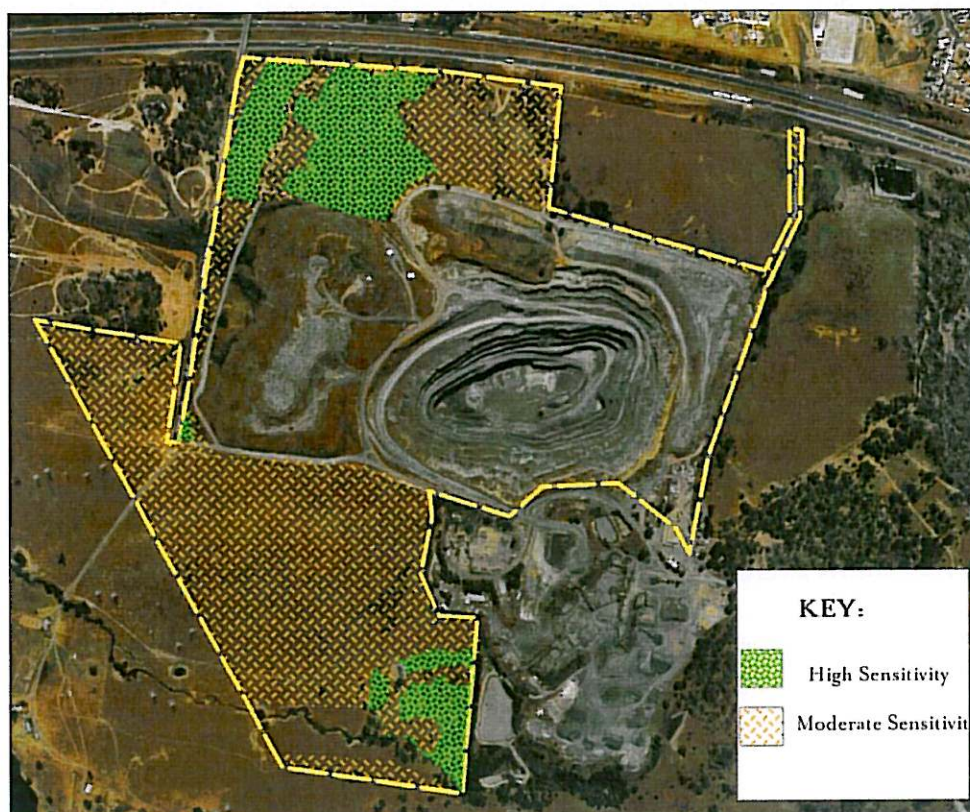


Table 2: Archaeological sensitivity zoning within the study area (i.e. excluding the Hanson leasehold).

| Sensitivity zone | Assessed potential | Existing land use disturbance | Area within subject land |
|------------------|-------------------------------------|-------------------------------|--------------------------|
| Zone 1 | High archaeological sensitivity | Low disturbance | 10.7 ha |
| Zone 2 | Moderate archaeological sensitivity | Moderate disturbance | 42.4ha |
| Zone 3 | Low archaeological sensitivity | High disturbance | 82.8ha |
| Total land | | | 114.5 ha |

The findings of the 2002 and previous surveys, and the assessment of archaeological sensitivity resulted in the following recommendations for heritage conservation (Jo McDonald CHM 2005). The relevant recommendations are summarised here:

- ☉ The Conservation Areas identified for the current study area are a good conservation outcome for Indigenous heritage considering the representative landscapes across the SEPP59 lands;
- ☉ A Plan of Management will be required to ensure the ongoing survival of high Aboriginal and archaeological (and flora and fauna) values in the designated conservation areas;
- ☉ Land which falls outside the defined Conservation Areas should be considered to be developable and unconstrained by Indigenous heritage issues. The developable lands should be managed on the basis of the sensitivity mapping and the defined management principles;
- ☉ There will be a range of impacts within developable land on landscapes which have High Archaeological Sensitivity (Zone 1) and Moderate Archaeological Sensitivity (Zone 2). Where Zone 1 and Zone 2 lands are likely to be impacted a sample of these should be selected for sub-surface investigation (salvage) as mitigation against their destruction;
- ☉ Areas and/or landscapes within Zone 3 have low archaeological potential. These should be considered as developable, and without archaeological constraint. There is no requirement for further investigation in these areas, although the Aboriginal community may wish to be involved at the time of land clearance;
- ☉ Identified archaeological surface features which fall within the developable lands will require section 90 Consent from the Director of NPWS NSW prior to construction commencing. Impacts will need to be defined before this can be granted. The Conservation Management Strategy directs that these would be managed on the basis of a 'whole of development' clearance across the developable lands;
- ☉ At the Precinct Plan stage, once the range of impacts has been defined and (if necessary) representative locations chosen for salvage, the proponent should

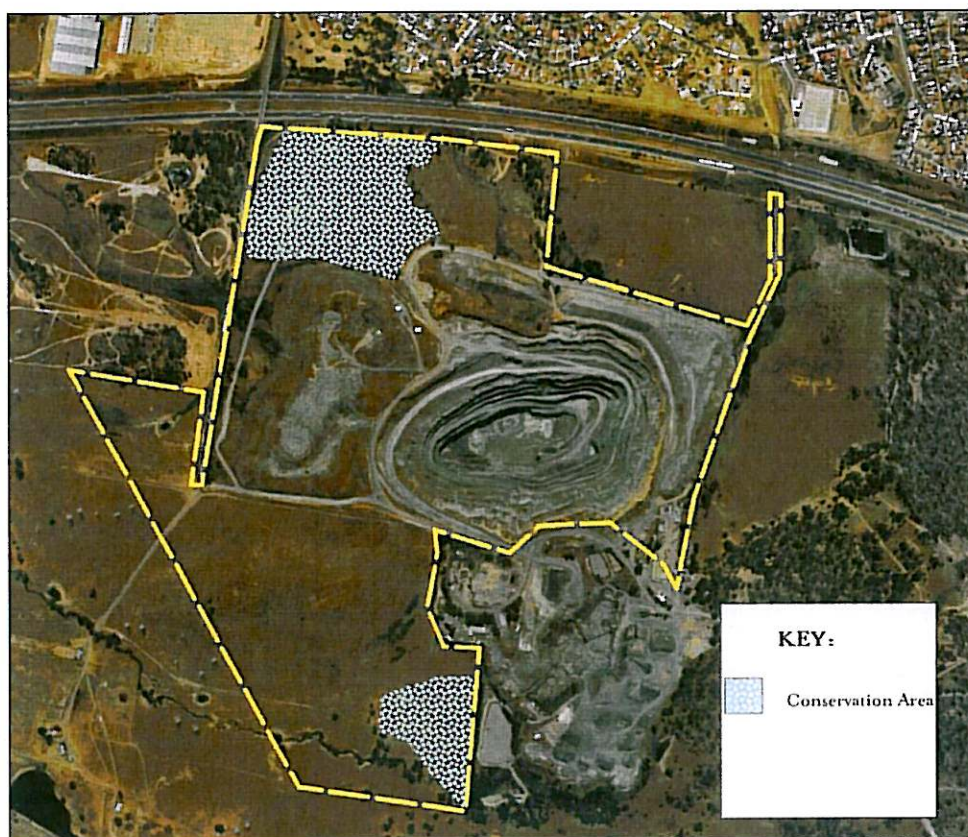
apply for a 'whole of development' Section 90 consent from the Director-General DECCW NSW.

6. CONSERVATION OUTCOMES

Two areas of high heritage sensitivity will form conservation areas within the DAD Industries Land. These will be protected from development impact. This is in accordance with the SEPP59 Eastern Creek Heritage Conservation Strategy (JMcD CHM 2002, 2005), and in accordance with the Director-General's Requirements as defined under Part 3A of the NSW Environmental Planning Act. The conservation areas will be conserved and managed in consultation with the Aboriginal community to ensure that they retain their heritage values (Figure 6). They are based on the recommended zonings (JMcD CHM 2005), modified to take into account more recent land use impacts in the southern part of the subject land.

The conservation areas comprise c. 13 ha of land. These are located in the northwestern corner of the subject land, in the south-east corner of the land. These conservation areas are representative of landscapes in the broader SEPP 59 Eastern Creek area, and comprise all of the Zone 1 land in the subject land. An appropriate conservation outcome has been achieved and a meaningful management outcome is thus anticipated.

Figure 6: Designated conservation areas within the DAD Industries land.



To achieve a meaningful management outcome, the identified conservation areas need to be managed appropriately to ensure that the area's identified heritage values are maintained. No development – or archaeological investigation – will take place within the defined conservation areas and that these will be managed into the future on the basis of their Aboriginal (and other) heritage values.

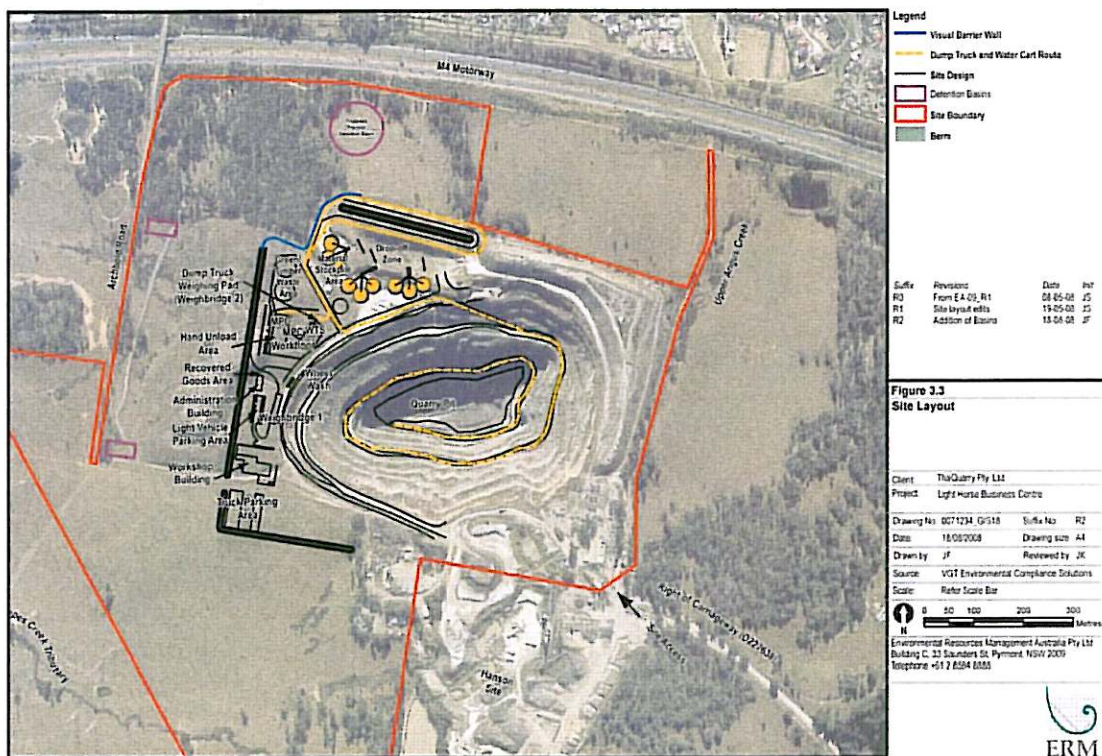
The Heritage Conservation Strategy (2005) recommended salvage excavation of a sample of developable lands with high/moderate sensitivity (and see the Director's General's requirements (page 1) should be considered across the SEPP59 lands.

Development Impacts

The proposed Light Horse Business Centre will be focused on the Quarry pit and surrounds (Figure 7). As such the majority of the proposed works will be located in areas which are already highly disturbed (Zone 3). Aboriginal heritage management is not a concern in these areas, and the development for the main can proceed without further consideration of these issues.

A number of development components are proposed for lands which have been only moderately disturbed (Zone 2). These include the construction of three detention basins (one to the north and two to the west of the quarry pit, adjacent to Archbold Road) and the leveling/contouring of land to the north of the site (immediately east of the conservation area).

Figure 7: Proposed development impacts associated with the Light Horse Business Park.



A Section 90 *Aboriginal Heritage Impact Permit* will be required for all works within the developable land as it is probable that buried archaeological material exists within areas outside the conservation areas and will be destroyed by development impacts. This AHIP should be obtained from the Director-General of DECCW NSW.

These proposed development impacts in Zone 2 lands are not considered major enough impacts to warrant further archaeological investigation. Should more extensive development proposals in the future be located in these Zone 2 areas then these would require further assessment at the time to determine whether subsurface investigation was warranted.

A possible future impact has been identified in the northern Conservation Zone (see Figure 3). This is a future proposed road. Relocation of this road to outside the conservation zone should be considered. If relocation is not an option then archaeological subsurface investigation (a salvage excavation) will be required to mitigate this impact.

7. CONSERVATION PROTOCOLS

To ensure that there is no inadvertent damage or impact occurs in the heritage conservation areas during maintenance or any other development activities planned within the Light Horse Business Centre, certain protocols need to be adopted by the proponent. The adoption of these protocols should be a requirement for any works done - including that done under contract or by other parties - within the Light Horse Business Park. These protocols include the following:

- ⊗ The relevant legislation and the legal responsibilities of the proponent and their contractors must be clearly outlined prior to works commencing and the penalties involved in regard to site damage and/or destruction clearly identified.
- ⊗ All maintenance and other workers should be inducted in relation to their cultural heritage responsibilities and in regard to the nature of likely archaeological material which may be encountered. A briefing by a qualified archaeologist or suitably experienced Aboriginal person would provide an appropriate induction. The boundaries of the heritage conservation areas should be clearly identified on all site plans generated for the development phase.
- ⊗ The fact that buried archaeological material, not visible at surface, is within the conservation zones must be stressed.
- ⊗ No construction activity or any other works which will impact on the soil should take place within the conservation zones without prior assessment by a qualified archaeologist.
- ⊗ All workers in the Light Horse Business Precinct should be briefed on the legal requirements regarding skeletal material. A Section 90 *Aboriginal Heritage Impact Permit* does not cover the discovery of human skeletal remains. If skeletal material is found, all works must cease immediately and the NSW Police Department and DECCW must be informed. Works cannot recommence until the Police Department is satisfied that the bones do not relate to a recent crime. Then, DECCW will have to grant a separate Section 90 for removal of the Aboriginal bones. This must be done in consultation with the relevant Aboriginal community.
- ⊗ Any management decisions made in relation to Aboriginal heritage within the conservation zones must involve consultation with representatives of the Aboriginal community. Cultural heritage as well as scientific values should be considered when making decisions about possible impacts within the conservation zones.
- ⊗ A copy of this draft AHMP is to be circulated to the relevant Aboriginal groups for their involvement in further discussions before this AHMP is finalised.

The current precinct plan indicates that the conservation areas will not be impacted by major infrastructure works during or as a result of this development. These areas should be fenced and access to these areas denied.

- ⊗ Vehicle access on currently existing tracks – There are several existing tracks within the northern conservation area. These access routes should not be widened or expanded. Vehicles should not drive off the existing tracks into undisturbed sections of the conservation area. Heavy machinery should not traverse the conservation area. Erosion and other impacts associated with use of the tracks should be appropriately managed.
- ⊗ General landscaping works – Stripping of topsoil is not permitted within the conservation areas as archaeological material exists on the ground surface and in the topsoil.

Any future impacts (e.g. a possible proposed precinct road) will need to be assessed on a case by case basis. All future management strategies should be devised in consultation with a qualified archaeologist, representatives of the Aboriginal community, and DECCW NSW.

- ⊗ Precinct Road Construction – The future precinct road is currently proposed for northwest of the proposed Light Horse Business Park, this located just inside the conservation area. To prevent impact on the conservation zone by road construction and vehicle access, the road should ideally be moved south of its current location, away from the conservation area. If this is not possible then this development impact will require salvage excavation prior to development.

There are several small scale impacts (i.e. three detention basins and an area of fill) proposed outside the conservation areas, and beyond the main industrial area. Management of these should be based on the assessed sensitivity of the lands in question, and on an assessment of representative landscapes within the Business Park. These impacts are generally located in Zone 2 areas. Given that these are relatively minor impacts; mitigation (via salvage excavation) is not considered warranted. Any further development impacts proposed for Zone 2 lands will need to be assessed at the time of their proposal.

Table 3: Management protocols for the DAD Industries conservation areas.

| Management Issue | Desired Outcomes | Actions and strategies |
|--|---|--|
| <p>Cultural heritage</p> <p>The subject land has identified areas of cultural and scientific values which are to be retained in the conservation zones.</p> <p>All Aboriginal sites, objects and places are protected under the <i>National Parks and Wildlife Act, 1974</i>.</p> <p>This AHMP provides for on-going involvement of Aboriginal custodians in the management of the cultural heritage.</p> | <p>Cultural features are to be conserved and managed in accordance with their assessed significance.</p> <p>Interpretation and education will ensure that inadvertent damage to the place and/or collection of artefacts/objects does not occur</p> | <p>Consult and involve Aboriginal custodians in all aspects of management of Aboriginal sites, places and values.</p> <p>Appropriate long term management strategies need to be determined in consultation with the Aboriginal community and DECCW.</p> |
| <p>Developable Lands</p> <p>The proponent proposes to construct a waste management facility and associated infrastructure within the developable lands.</p> <p>This facility is almost entirely within lands which have been previously highly disturbed (Zone 3). These lands are unimpeded by heritage constraints.</p> <p>There are several other small items and proposed land uses which will impact on the developable lands which are designated Zone 2.</p> | <p>The conservation areas must not be disturbed or impacted upon during the development phase in the adjacent developable lands.</p> <p>The conservation area must be fenced prior to works occurring in the developable lands.</p> <p>To the north of the site and east of the northern conservation area will have the most significant impact from the construction of a detention basin and the filling of this area. This area should be considered as a potential salvage area prior to development. Any further impacts in zone 2 lands should be assessed in relation to possible subs-surface investigation.</p> | <p>Access to the conservation areas should be limited and managed appropriately.</p> <p>No heavy machinery should be allowed into the conservation area.</p> <p>A Section 90 <i>Aboriginal Impact Permit</i> should be obtained from DECCW NSW for the developable land as it is likely that buried archaeological material will be disturbed during development (particularly in Zone 2 areas). This permit will be conditional on the designation and maintenance of the conservation areas. There are no further management requirements relating to Aboriginal cultural heritage outside the conservation areas.</p> |

| Management Issue | Desired Outcomes | Strategies |
|---|--|---|
| Conservation Areas The primary management issue is to ensure that proposed future uses of the conservation areas do not impact on its conservation values over time. The future precinct road to the northwest of the development site is currently indicated on the Master Plan as partly within the conservation area. | Disturbance to the conservation areas should be minimised and areas well maintained. The future precinct road should be moved to the south of the conservation area boundary. If this is not possible then the proposed impact of this road will need to be mitigated by salvage excavation. Interpretation and education would ensure that inadvertent damage to the place(s) and/or collection of artefacts/objects does not occur | The conservation areas should be fenced and access to these areas by all personnel should be limited. Trail bike usage of the area must be stopped. Recreational activities should be passive only: the use of the current dirt roads as walking trails would be an appropriate usage |
| Control of Exotic Fauna Identify and control of feral animals likely to be in the conservation area. | The impact of pest animals on the conservation area is minimised. | Domesticated and other exotic animals should be managed with appropriate control methods (e.g. checking conservation area for evidence and treating any outbreaks) Rabbit populations should be controlled because of the damage that their burrows cause to archaeological deposit. |
| Control of exotic and non-indigenous flora Weeds are species which are not native to the area. Under the Noxious Weeds Act 1993, declared noxious weeds must be controlled. The use of herbicide is permitted, but the removal of plants by the digging out of roots or any activity which would impact on the ground surface - would not be permitted. | The impact of exotic and non-indigenous plant species on native flora is minimised. | Use of machinery and excavation of topsoil are to be avoided. No machinery is to be used in culturally sensitive areas Appropriate control methods would include checking the conservation areas for weed invasion and regrowth and treatment of any outbreaks. Removal of blackberries should be done with a combination of herbicides and hand clearance |

| Management Issue | Desired Outcomes | Strategies |
|--|---|--|
| <p>Restoration of Vegetation</p> <p>Previous land use has resulted in the loss of native vegetation in pockets within the conservation areas.</p> <p>Re-vegetation zones (if proposed) may impact on sensitive archaeological locations</p> | <p>Restored areas should contain native vegetation with a structure and species diversity appropriate to the SEPP59 lands</p> | <p><u>Natural regeneration</u> is the preferred method of restoration.</p> <p>Local indigenous flora is sometimes re-established by large scale planting exercises. This process is not desirable in culturally sensitive areas because of the impact that this would have on the archaeological values.</p> |

8. REFERENCES

- Helen Brayshaw Heritage Consultants 1996 M4 Upgrade Archaeological survey for Aboriginal sites for proposal to upgrade the M4 Motorway from Church Street Parramatta to Coleman St may Hill and Prospect to Emu Plains. Report to SWR Constructors Pty Ltd thought Environment Planning Pty Ltd.
- Jo McDonald CHM Pty Ltd 2002 Archaeological assessment of Aboriginal Sites: Eastern Creek Strategic Landuse Study, SEPP 59 Lands in Blacktown Council. Report to Blacktown City Council.
- Jo McDonald CHM Pty Ltd 2005 Heritage Conservation Strategy for Aboriginal sites in the lands owned by Valad Funds Management Ltd and Sargents P/L, in the Eastern Creek Business Park (Stage 3) Precinct Plan Blacktown, NSW. Report to Valad Funds Management Ltd and Sargents Pty. Ltd.

APPENDIX

ABORIGINAL REPRESENTATIVE GROUP RESPONSES

(DLALC, DACHA, & DCAC to be added when received)

Darug Aboriginal Cultural Heritage Assessments

ABN 51734106483

Gordon Morton & Associates

Mob: 0422 865 831

Fax: 45 677 421

Celestine Everingham

90 Hermitage Rd., Kurrajong Hills, 2758

Ph/Fax: 45677 421

Mob: 0432 528 896

5.10.09.

Attention

Christopher Biggs
Light Horse
Business Centre

re Survey at Light Horse Business Centre.

Gordon Morton from DACHA undertook the
field inspection on the above site with
Jo McDonald Cultural Management P/L. DACHA
supports the proposed activities and development
- the area in question was very disturbed
and no Darug artifacts were located.

Yours Sincerely,
Gordon Morton

DARUG CUSTODIAN ABORIGINAL
CORPORATION

PO BOX 81 WINDSOR 2756

ABN: 81935722930

PH: 45775181 FAX: 45775098 MOB: 0415770163

mulgokiwi@aol.com

18 January 2010

Attention: Christopher Biggs.

SUBJECT: Aboriginal Heritage assessment – Light Horse Business
Centre, Eastern Creek.

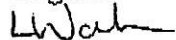
Dear Christopher,

The Darug Custodian Aboriginal Corporation have received the management plan inclusive of the findings and recommendations reported by JoMcDonald Cultural Heritage management consulting for the Light Horse Business Centre, Eastern Creek.

Our group supports the recommendations and findings discussed during our site visit, included in the plan of management for this area.

We look forward to working with you on this project please do not hesitate to contact us with all enquiries on the above numbers.

Regards



Leanne Watson



DARUG TRIBAL ABORIGINAL CORPORATION

PO Box 441
Blacktown, NSW, 2148
PH/Fax: (02) 9622 4081
Mobile 041 543 926
Email: darug_tribal@live.com.au
ABN: 77 184 151 969 ICN: 2734

27/11/09

Dear Sandra

Re: The LIGHT HORSE BUSINESS PARK ABORIGINAL HERITAGE MANAGEMENT PLAN

Having read the report we support all the recommendations including the application for the s90.

Hugs & Smiles

Sandra Lee

Secretary

Darug Tribal Aboriginal Corporation

DARUG
THE TRADITIONAL CUSTODIANS OF DARUG LAND
www.darug.org.au

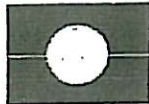
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Gordon Workman

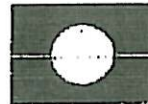
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DARUG - LAND - OBSERVATIONS



ABN: 87239202455
E-mail: gordon@dadindustries.com.au
Po Box: 571 Plumpton, NSW 2761
Phone: 029831 8868 or 0415 663 763



30-10-2009

MS Jo McDonald
Cultural Heritage Management Pty Ltd

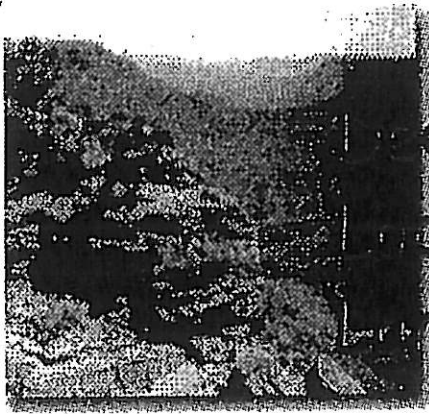
RE: The Light Horse Business Centre Eastern Creek
Aboriginal Heritage Management Plan

After reading through your Draft of the, The Light Horse Business
Centre Eastern Creek Aboriginal Heritage Management Plan

We at D.L.O find that the draft is very good and cover's all of our
concerns and we are happy with the Recommendations in this
report and would like to be kept informed of any and all works to
be carried out on this site

Yours faithfully

Uncle
Gordon Workman
Darug Elder



Deerubbin Local Aboriginal Land Council

5/271 Beames Avenue
PO Box 3184
Mt Druitt Village
NSW 2770 Australia

Ph: (02) 9832 2457
Fax: (02) 9832 2496
Email: Staff@Deerubbin.org.au
Web: <http://www.deerubbin.org.au>

Chris Biggs
DAD Industries
32 Burrows Road
ALEXANDRIA NSW 2015

Our Reference: 2081

29 September 2009

**Subject: Protection of Aboriginal Cultural Heritage
Dial a Dump Industries Facility
Old Wallgrove Road, Eastern Creek**

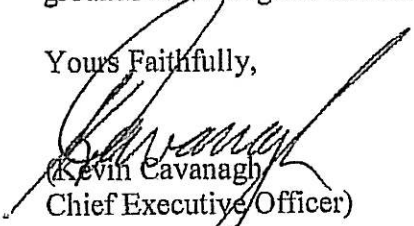
Dear Mr Biggs,

A representative of the Deerubbin Local Aboriginal Land Council (Steve Randall) inspected Dial a Dump Industries Facility, Old Wallgrove Road, Eastern Creek on 30 August 2009. An Aboriginal cultural heritage assessment was undertaken to evaluate the likely impact the proposed development has on the cultural heritage of the land.

Our representative reports, that, because of extensive ground disturbance within the study area, no Aboriginal cultural materials (in the form of stone artefacts, for example) were found.

Deerubbin LALC therefore, has no objections to the proposed development on the grounds of Aboriginal cultural heritage.

Yours Faithfully,


(Kevin Cavanagh
Chief Executive Officer)

c.c. Miranda Firman - Aboriginal Heritage & Planning Officer, Department of
Environment, Climate Change & Water.
c.c. General Manager - Blacktown City Council
c.c. Sandra Wallace - Jo McDonald Cultural Heritage Management Pty Ltd

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