Review of Environmental Factors Addendum Natural Area Program: Restoration Works and Bushcare Works



Hewitts Creek Bushcare Addendum EP REF-2024/8

This document provides the outcome of the Review of Environmental Factors (REF) Addendum undertaken in November 2024 for the additional natural area restoration works within the Hewitts Creek Bushcare area under the Natural Area Program at Sandon Point Aboriginal Place. This is an addendum to REF EP REF-2023/8 (ECM Ref: 24553407) which was signed off on 24 October 2023, to allow for extended natural area management activities at the Hewitts Creek Bushcare site.

The proposed activities listed in the scope of works have been assessed against the *State Environmental Planning Policy (Transport and Infrastructure) 2021*, and do not require consent under Division 12 Parks and other reserves and Division 25 Waterway or foreshore management activities, which permit environmental management works in parks and reserves and waterways and foreshores without consent.

As the proposed activity does not require development consent, the environmental impacts have been considered in accordance with the environmental assessment requirements of Part 5, Division 5.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). In accordance with the requirements of Part 5 of the EP&A Act, the factors listed in Clauses 170 and 171 of the *Environmental Planning and Assessment Regulation 2021* have been taken into account in the consideration of the likely impacts of the proposed activity on the environment.

The assessment has been undertaken through impact identification and a risk management assessment. This report documents the outcomes of the assessment and identifies the environmental safeguards that must be implemented in conjunction with the proposal.

The proposed activity has been discussed with the Community Land Management Officer and does not require any further assessment, approvals or consents under any other relevant legislation.

The results of the REF indicate that the proposed additional activities will have no significant environmental impacts, provided the safeguards identified in this report are strictly implemented. If the scope of works or work methods described in this report change significantly, additional environmental assessment must be undertaken by an Environmental Assessment/Strategy Officer.

Works are to commence, and be substantially completed, within 3 years of the original REF (ECM Ref: 24553407) sign off date. Any substantial works to be undertaken outside this period will require a review of the REF.

All safeguards relating Aboriginal Heritage from the original Sandon Point Aboriginal Place REF must be strictly implemented, noting this site is within Management Zone 2 of the Aboriginal Heritage Impact Permit (AHIP) for Sandon Point and McCauleys Beach Plan of Management (AHIP C0004686) – ECM Doc Set ID 19160012.

Note – only works from the Sandon Point and McCauleys Beach VMP can be undertaken for this project, in accordance with the Aboriginal Heritage Impact Permit for Sandon Point and McCauleys Beach Plan of Management. This may impact on the standard scope of works listed in section 2 of the original REF, for example the removal of weed trees will likely require a site monitor under the AHIP, this requirement may make the activity not feasible, depending on the project's parameters. Seek advice of the Council's Community Land Management Officer in relation to AHIP requirements.

See over page for sign off.

Publication Requirements:

The EP&A Regulation (<u>clause 171(4</u>)) requires the REF to be published prior to works commencing (if possible, otherwise within a month) if the activity involves:

- a capital investment value of more than \$5 million or,
- an approval or permit for activity that requires approval under:
 - Fisheries Management Act 1994 sections 144, 201, 205 or 219, or
 - o Heritage Act 1977 section 57, or
 - National Parks and Wildlife Act 1974 section 90 or
 - Protection of the Environment operations Act 1997 sections 47-49 or 122, or
- if the determining authority considers it to be in the public interest.

The application did require publication in accordance with EP&A Regulation (clause 171(4)).

REF Preparation Sign Off

Date of Assessment:	December 2024	Review of the REF EP REF-2023/8 (ECM	Sept
		Ref: 24553407) and this addendum due:	2026

I, the undersigned, certify that I have reviewed and endorsed the contents of this REF document and, to the best of my knowledge, it is in accordance with the EP&A Act, the EP&A Regulation and the Guidelines approved under clause 170 of the EP&A Regulation, and the information it contains is neither false nor misleading.

	Name	Sign	Date
REF Preparation Sign Off:	Julia Palmer	palmer	12/12/2024
REF Review Sign Off:	Amanda Schipp	AKSchip	12/12/2024

Natural Area Management Team and Contractors accepts that this REF is for the environmental assessment component only and is responsible for all other project risks associated with the project management components. The information in this document is not considered sufficient to address any other project management requirements and safety/risk approvals, such as services investigations; consultation; cost estimate; traffic and site management; project risk assessment (etc).

Natural Area Management Team certifies that all relevant contractors and Bushcare volunteers have been provided a copy of this REF and have been explicitly instructed on the safeguards within Section 6 of this REF.

	Name	Sign	Date
Natural Areas Coordinator Sign off:	Greg Fikkers	R -	19/12/24
Natural Areas Officer Sign Off:	Johnny Alevras	TA	19/12/24
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1. Project Details

Project Name	Sandon Point Aboriginal Place Natural Area Restoration and Hewitts Creek			
	Bushcare, Bulli			
Original Project Location/s	The Sandon Point Aboriginal Place in Bulli and Bushcare group along Hewitts Creek – see maps in Appendix A. Both sites are within the Aboriginal Heritage Impact Permit (AHIP) for Sandon Point and McCauleys Beach Plan of Management (AHIP C0004686).			
Lot and DP/s	Sandon Point Aboriginal Place site - Lot 4 DP 588060, Lot 3 DP 588060, Lot 238 DP 1048602, Lot 102 DP 268549, Lot 103 DP 7813 Hewitts Creek Bushcare site - Lot 102 DP 268549			
Amended/additional Original Project Location/s	Extension of area at Hewitts Creek Bushcare site - Lot 102 DP 268549 – see maps in Appendix A.			
Original Project Background and Description	The project seeks to restore and enhance the Sandon Point Aboriginal Place, which also contributes to corridor connectivity and biodiversity in Bulli. This is a new site into the program, and it requires significant primary and secondary weed control. The site will be contracted to the Illawarra Local Aboriginal Lands Council who are able to undertake minimal ground disturbance which will include hand removal of weeds as well as revegetation with low growing species or replacement of vandalised trees. The long-term goal is to improve the amenity of the site, build bridges with the local Aboriginal community and the local residents and ultimately remove the temporary fencing at the site. Most of the work will not require ground disturbance and will be cut and painting and spot spraying of weeds as well as brush cutting of overgrown grass and other vegetation. Bushcare Works listed accordance with the Hewitts Creek Site Plan. Activities must be compliant with the Sandon Point and McCauleys Beach Vegetation Management Plan (VMP).			
Description of Amended or Additional Works	No additional scope of works proposed. The Bushcare works is an extension of the existing Bushcare area and must be compliant with the Sandon Point and McCauleys Beach Vegetation Management Plan (VMP).			
Document Record References	Contractor Specifications 23-24 – ECM Doc Set ID 24604656 Aboriginal Heritage Impact Permit (AHIP) for Sandon Point and McCauleys Beach Plan of Management (AHIP C0004686) – Z19/88762 Sandon Point and McCauleys Beach Vegetation Management Plan (VMP) – Doc Set ID 1579539 Sandon Point and McCauley's Beach Plan of Management – Doc Set ID 24468070			
Project Timing	The original REF covered works from October 2023 to September 2026. This addendum is provided to cover works at this extended site as described above from December 2024 to September 2026.			
Other details	All other project details remain the same as the original EP REF-2023/8 (ECM Ref: 24553407).			
Is the project scope of additional/amended works within the list shown in Section 2 of the original REF?	 ✓ Yes ○ No Note – only works from the Sandon Point and McCauleys Beach VMP can be undertaken for this project, in accordance with the Aboriginal Heritage Impact Permit for Sandon Point and McCauleys Beach Plan of Management. This may impact on the list of activities, for example the removal of weed trees will likely require a site monitor under the AHIP, this requirement may make the activity not feasible, depending on the project's parameters. Seek advice of the Council's Community Land Management Officer in relation to AHIP requirements. 			

2. <u>Site Checklist of Environmental Factors for the additional/amended works</u>

This section identifies site specific constraints for the extended Hewitts Creek Bushcare site that may trigger further assessments and/or the inclusion of specific safeguards or controls.

Site Deta	ils	Notes
Site Name	Hewitts Creek	
	Bushcare	
Lot/DP	Lot 102 DP 268549	
Council Land Type	Community Land	
Community Land Category	Cultural Significance –	
	Woodlands Avenue	
	Reserve	
Crown Reserve No.	N/A	
LEP Zone	RE1 – Public	
	Recreation	
NA Asset Unit No.	83	Does not extend down into area that this REF is adding.

Risk area	Y/N	Comment
Biodiversity		
Is the work area within a Vegetation	□ No	
Community identified in NP PCT	⊠ Yes	• MU56d – cleared – primarily mapped as this.
Vegetation Layer?		 MU54 – Floodplain Wetland (BC Act Freshwater Wetlands on
		Coastal Floodplain)
		Ensure safeguards relating to Flora, Fauna & Ecosystems are strictly
		applied.
Are the works located on mapped as	🖾 No	
Natural Resource Sensitivity –	🗆 Yes	
Biodiversity land?		
Are the works located on the	🗆 No	
Biodiversity Values Map?	🛛 Yes	Small portion mapped towards the south end of the extension area.
		Associated with Wetlands mapped under the Coastal Management
		Act 2016. However, works aim to improve the condition of the
		landscape and will enhance the vegetation quality and increase
		habitat value.
		The proposed activities listed in the scope of works have been
		assessed in the Coastal Management Areas Assessment in Appendix
		C of the original Sandon Point Aboriginal Place REF EP REF-2023/8
		(ECM Doc Set ID: 24553407) and are compliant with the matters of
		considerations in the SEPP (Resilience and Hazards) 2021 and can
		proceed if the safeguards in original Sandon Point Aboriginal Place REF EP REF-2023/8 are strictly applied.
		Ensure safeguards relating to Water Quality, Use of Herbicides,
		Erosion and Sediment Controls, and Flora, Fauna & Ecosystems are
		strictly applied.
Is any vegetation required to be	□ No	
removed?	🛛 Yes	Only weeds will be removed and potentially pruning of native
		vegetation as per the Scope of Works included in EP REF-2023/8.
		Ensure safeguards relating to Water Quality, Use of Herbicides,
		Erosion and Sediment Controls, and Flora, Fauna & Ecosystems are
		strictly applied.
Are any Koala Use or Koala Feed Tree	🖾 No	
Species as identified in Schedule 3 and	🗆 Yes	
Schedule 4 of the SEPP (Biodiversity		
and Conservation) 2021 proposed for		
removal?		
Is the work area within a Habitat	□ No	
Model?	🛛 Yes	Large-footed Myotis

		 Green and Golden Bell Frog Ensure safeguards relating to Flora, Fauna & Ecosystems are strictly applied.
Is the work area within Key Fish Habitat?	⊠ No	
Are there any Endangered Ecological	□ Yes	
Communities or threatened, migratory	□ No	
and/or marine species mapped on or adjacent to the work area?	⊠ Yes	 EECs On-site: MU54 – Floodplain Wetland (BC Act Freshwater Wetlands on Coastal Floodplains). In close proximity: MU35 – Alluvial Swamp Mahogany (BC Act Swamp Sclerophyll Forest); MU53 – Estuarine Alluvial Wetland (BC Act Sydney Freshwater Wetlands); MU36 – Coastal Swamp Oak Forest (BC Act Swamp Oak Floodplain Forest & Potential Coastal Swamp Oak (<i>Casuarina glauca</i>) Forest). Threatened Species No threatened species are mapped on site. In close proximity: Latham's Snipe; Hawksbill Turtle; Australasian Bittern; Green and Golden Bell Frog; Grey-headed Flying Fox; Powerful Owl. Migratory/Marine Species that have been identified at or in proximity to the subject site that are listed as Migratory and/or Marine (with no threatened status) under the EPBC Act 1999 are unlikely to be present due to their range/habitat requirements. Due to the nature of the works, which are to improve the vegetation
		 and habitat of the area, an adverse impact is not expected on any migratory or marine species. Are the EECs/threatened species included in the Generic Biodiversity Assessment for Natural Area Management Activities (Z20/167450)? Xes
		The proposed activities in the scope of works have been assessed for any significant impact on all EECs mapped as occurring on natural area work sites within the LGA. Provided the environmental safeguards identified are strictly implemented, the proposed works are not likely to significantly affect any threatened species, populations or ecological communities listed under the <i>Biodiversity</i> <i>Conservation Act 2016</i> , or their habitats, and the preparation of a Species Impact Statement or Biodiversity Development Assessment Report is not warranted.
		Similarly, the proposed works are not likely to significantly affect any threatened species, populations or ecological communities listed under the <i>Environment Protection and Biodiversity</i> <i>Conservation Act 1999</i> , or their habitats, and a Referral to the Commonwealth Minister for the Environment for a decision on a 'controlled Action' is not warranted.
Is the work area on land identified as	🖾 No	
the Escarpment Management Plan Area?	□ Yes	
Is the work area on land that is subject	🛛 No	
to a Biodiversity Stewardship Agreement in accordance with Part 5, Division 2 of the <i>Biodiversity</i>	□ Yes	
Conservation Act 2016?		
Coastal Zone		

	т	
Is the work area within any	🛛 Yes	The site is mapped in the following coastal zones:
management areas defined by SEPP		Coastal Use Area
(Resilience and Hazards) 2021?		Coastal Environment Area
 coastal vulnerability area coastal environment area 		Coastal Wetlands Buffer
- coastal use area		The proposed activities listed in the scope of works have been
- coastal wetlands and littoral		assessed in the Coastal Management Areas Assessment in Appendix
rainforest buffer		C of the original Sandon Point Aboriginal Place REF EP REF-2023/8
		(ECM Doc Set ID: 24553407) and are compliant with the matters of
		considerations in the SEPP (Resilience and Hazards) 2021 and can
		proceed if the safeguards in original Sandon Point Aboriginal Place
		REF EP REF-2023/8 are strictly applied.
		Ensure safeguards relating to Eleve Fours and Footurtame Water
		Ensure safeguards relating to Flora, Fauna and Ecosystems, Water Quality, Erosion and Sediment Controls and Use of Herbicides are
		strictly applied.
Is the work area within the coastal	□ No	· · · · · ·
wetland or littoral rainforest	⊠ Yes	Coastal Wetlands mapped towards bottom of extension area. Also
management areas defined by SEPP		adjacent in several spots.
(Resilience and Hazards) 2021?		
		Are the proposed activities on this site identified in a certified
		Coastal Management Program or Plan of Management prepared
		and adopted under the LG Act or CLM Act?
		Yes Included in the Sandon Point and McCauley's Beach Plan of
		Management February 2015. The proposed activities listed in the
		scope of works have been assessed in the Coastal Management
		Areas Assessment in Appendix C of the original Sandon Point
		Aboriginal Place REF EP REF-2023/8 (ECM Doc Set ID: 24553407)
		and are compliant with the matters of considerations in the SEPP
		(Resilience and Hazards) 2021 and can proceed if the safeguards in
		original Sandon Point Aboriginal Place REF EP REF-2023/8 are
		strictly applied.
Heritage		
Is there any Aboriginal Heritage within	□ No	
or close proximity to the work area?	⊠ Yes	The area is covered by the AHIP for Sandon Point and McCauleys
		Beach Plan of Management (AHIP C0004686).
		Ensure all safeguards relating to Aboriginal Heritage from the
		original Sandon Point Aboriginal Place REF EP REF-2023/8, and this
		addendum, are strictly implemented, noting this site is within Management Zone 2 of the AHIP C0004686. See Appendix G in the
		original Sandon Point Aboriginal Place REF for Induction Materials.
Is there any Heritage listed on the	🛛 No	
current LEP within or in close proximity	□ Yes	
to the work area?		
Is the work area within a Crown	⊠ No	
Reserve?	□ Yes	
Water Quality		
	🗆 No	
Are the works to be conducted within	🛛 Yes	The Hewitts Creek Bushcare area extension is approximately 40m
40m of watercourses or any other type		from Hewitts Creek.
of natural water body?		Ensure safeguards relating to Water Quality Lies of Harkinidas
		Ensure safeguards relating to Water Quality, Use of Herbicides, Erosion and Sediment Control and Flora, Fauna & Ecosystems are
		strictly applied.
Are the works to be conducted within a	□ No	
riparian zone?	⊠ Yes	Within 50m riparian buffer required either side of a Category 1
		watercourse. However, works aim to improve the condition of the
		landscape and will enhance the vegetation quality and increase

		habitat value, so are consistent with the protection objectives of
		this riparian area.
		Ensure safeguards relating to Water Quality, Use of Herbicides, Erosion and Sediment Control and Flora, Fauna & Ecosystems are strictly applied.
Do the works involve the use or	🗆 No	
storage within the work areas of fuels or other chemicals (other than fuels contained within the work vehicles)?	🛛 Yes	Herbicides may potentially be used. Ensure safeguards relating to Water Quality and Use of Herbicides are strictly applied.
Are the works within the Sydney	🛛 No	
Drinking Water Catchment?	□ Yes	
Soils/Landform		
Are there acid sulfate soils mapped in	□ No	
the LEP as occurring on this site/s?	🛛 Yes	Class 3 and Class 4 are mapped at the site.
		Ensure safeguards relating to Acid Sulfate Soils are strictly applied.
Will the works create areas of	🗆 No	
unprotected soil or loose surface for more than 24 hours?	🖾 Yes	Ensure safeguards relating to Water Quality and Erosion and Sediment Controls are strictly applied.
Could the works result in disturbance	🗆 No	
of contaminated land or contaminated	⊠ Yes	Contaminated Land mapped directly adjacent to south of extended
material?		area. Ensure works are undertaken in accordance with Aboriginal Heritage controls to limit ground disturbance.
		Ensure safeguards relating to Asbestos , Contamination and In-situ Waste Classification are strictly applied. Refer to the Unexpected Finds Procedure in Appendix F of original Sandon Point Aboriginal Place REF EP REF-2023/8 (ECM Doc Set ID: 24553407).
Will the waste generated by the works	🖾 No	
include hazardous substances (such as lead, asbestos or other substances designated as hazardous by the National Occupational Health and Safety Commission)?	□ Yes	
Miscellaneous		
Are the works located within an area or	🗆 No	
adjacent to land uses that may be highly sensitive to dust, odours, work machinery emissions or traffic?	🛛 Yes	Ensure safeguards relating to Air Quality and Energy and Traffic and Access are strictly applied.
Will the works result in a reduction of the aesthetic and/or recreational qualities of the area or restrict the	🖾 No	The works are to improve the ecological, aesthetic, recreational and cultural values of the area by removing invasive species and protecting and planting local native species.
beneficial uses of the area in the future?	□ Yes	
Will the works cause excess noise?	□ No	
	⊠ Yes	Possible temporary noise if large equipment/plant in use. Ensure safeguards relating to Noise & Vibration, Air Quality and Energy and Traffic and Access are strictly applied.

3. <u>Relevant Legislation and Approvals for the additional/amended works</u>

All legislation relevant to the broader Sandon Point Aboriginal Place Natural Area Restoration and Hewitts Creek Bushcare, Bulli REF can be found under EP REF-2023/8 (ECM Ref: 24553407). The proposed extension area to the Hewitts Creek Bushcare has been assessed against the following relevant planning and environmental legislation:

- State Environmental Planning Policy (Resilience and Hazards) 2021 this site is within the coastal wetlands buffer area mapping in the SEPP. This site has been assessed against the matters of consideration in the SEPP (Resilience and Hazards) 2021 in the original REF (ECM Doc Set ID 24553407). This assessment found that works in coastal wetlands buffer can proceed if the safeguards in the original REF EP REF-2023/8 (ECM Doc Set ID 24553407) are strictly applied.
- National Parks and Wildlife Act 1974 An AHIP has been issued for Sandon Point and McCauleys Beach Plan of Management (AHIP C0004686). In accordance with the AHIP, activities must be compliant with the Sandon Point and McCauleys Beach Vegetation Management Plan (VMP) and subject to the safeguards in Section 6. See Induction materials in Appendix G of the original REF EP REF-2023/8 (ECM Doc Set ID 24553407).

4. Environmental Safeguards (in addition to original REF Safeguards)

The following **additional/amended** safeguards must be incorporated as conditions of any contract or work specification for the project. Note, for completeness, the safeguards relating to Aboriginal heritage from the original REF have been repeated here, along with some additional safeguards shown in bold.

The safeguards must also be incorporated into any project-specific risk assessment. The completed risk assessment must be reviewed by a WCC Natural Areas Officer before commencement of the works. All other safeguards included in the Sandon Point Aboriginal Place Natural Area Restoration and Hewitts Creek Bushcare, Bulli REF EP REF-2023/8 (ECM Ref: 24553407) apply also.

The REF must be revised immediately if any changes to the scope of works or work methods occur after initial endorsement. All changes to the REF must be reviewed and endorsed by a WCC Environmental Assessment/Strategy Officer.

Note – only works from the Sandon Point and McCauleys Beach VMP can be undertaken for this project, in accordance with the Aboriginal Heritage Impact Permit for Sandon Point and McCauleys Beach Plan of Management. This may impact on the standard scope of works listed in section 2 of the original REF, for example the removal of weed trees will likely require a site monitor under the AHIP, this requirement may make the activity not feasible, depending on the project's parameters. Seek advice of the Council's Community Land Management Officer in relation to AHIP requirements.

All safeguards relating Aboriginal Heritage from the original Sandon Point Aboriginal Place REF, and this addendum, must be strictly implemented.

Aboriginal Heritage

An Aboriginal Heritage Impact Permit (AHIP) has been issued for Sandon Point and McCauleys Beach Plan of Management (AHIP C0004686). In accordance with the AHIP, activities must be compliant with the Sandon Point and McCauleys Beach Vegetation Management Plan (VMP) and subject to the following safeguards:

Note this addendum applies to works in Management Area 2 of the AHIP C0004686.

- Heritage Site Induction for Council Staff, Contractors and Volunteers every time a person carries out the activity in Management Areas 2 and 4 and at the beginning of project activities in Management Areas 3 and 1.
- Natural Areas Coordinator to notify the Register Aboriginal Parties by letter or email or phone call or in person that the activity will happen or has happened if it is a routine activity.

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- Sandon Point Aboriginal Place Joint Management Agreement Partners have agreed that the Illawarra Local Aboriginal Land Council can undertake works from the VMP within the Aboriginal Place. This satisfies AHIP requirements for MA2 activities. The Land Council is a Registered Aboriginal Party under the AHIP.
- Planting of low growing species listed in the VMP with minimal ground disturbance is permitted. Larger plants and shrubs that require ground disturbance will require a site monitor to be engaged during works.
- Bushcare volunteer VMP works can occur outside of the Aboriginal Place, in Management Area 2 as the Sandon Point Aboriginal Place Joint Management Agreement Partners have agreed.
- Other contractors are able to undertake VMP work outside of the Aboriginal Place in Management Area 3.
- Do not use equipment larger than hand tools or drive a vehicle to carry out an activity during times of wet or rain. Access to work site with equipment or vehicles larger than hand tools -use only existing cycleway, concrete footpaths or disturbed areas excluding the McCauleys Beach dunes. See Disturbance Map and Sanctioned Beach Access Map. For emergency access to McCauleys' Beach use Access Point 2 if access via Corbett Avenue is not possible. Access 12 is suitable for that type of access for the patrolled Sandon Point Beach.
- Use rubber types/track on heavy equipment accessing a work site.
- Avoid Aboriginal Heritage Item Management System (AHIMS) site when undertaking the activity.
- Human remains If any human remains (other than any human remains described in Schedule B4) are discovered and/or harmed in, on or under the land, the AHIP holder must:
 (a) not further harm these remains
 - (b) immediately cease all work at the particular location
 - (c) secure the area so as to avoid further harm to the remains
 - (d) notify the local police and OEH's Environment Line on 131 555 as soon as practicable and provide any available details of the remains and their location, and
 - (e) not recommence any work at the particular location unless authorised in writing by OEH.

If any previously undetected archaeological site, object or artefact is uncovered or unearthed during the course of any works or activities associated with the proposal, works should cease in the vicinity of that site, object or artefact. Council's Community Land Management Officer (4227 7549 or 0408 273 520) or Heritage Advisor should be contacted immediately. A copy of the AHIP Heritage Induction materials should be kept on site by the coordinator of the works, there are provisions in checklist 2 in the induction materials to follow if an Aboriginal object or artefact is uncovered.

Appendix A: Project Maps



Figure 1 - Original and Extension Areas for the Hewitts Creek Bushcare site.



Figure 3 - Hewitts Creek Bushcare Original Area (in green)



Figure 2 - Hewitts Creek Bushcare Extension Area (in orange)