

10 February 2023

Michael Taurasi
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Via email: Michael.Taurasi@colliers.com

Re: St Peters College, Broulee DD – Heritage Advice Letter (Niche ref: #7479)

Niche Environment and Heritage (Niche) has been commissioned by Colliers International Project Management (the Proponent) to provide further heritage advice in response to a Request for Information (RFI) provided by Eurobodalla Shire Council (USC).

The RFI dated 16 November 2022 has requested further advice with respect to heritage identified in the St. Peters College Broulee Aboriginal Objects Due Diligence Assessment (DD) report produced by Niche in July 2022.

Specifically, the RFI has requested:

1. A revised DD report that provides additional details regarding the clearance of vegetation required for asset protection zones (APZ). The revisions must provide further detail as to the mitigation methods to avoid potential impacts to identified heritage.
2. The provision of a site constraints plan identifying Aboriginal cultural heritage sites (both existing and newly recorded).
3. Further information as regards the meaning of 'assessed' area is in Figure 6 of the DD. *(Please note, Figure 6 has been revised to Figure 9 in the updated DD).*
4. Clarity on the methodology for the 'hatched area' illustrated on the architectural plans (i.e. Figure 8 of the DD). *(Please note, Figure 8 has been updated to Figure 11 in the updated DD).*
5. Information as to the offset dimensions for protected areas and the type of fencing required.
6. Clarity as to whether shape files have been taken directly from the DD.

All six requirements have been addressed through revisions of the DD, as detailed in Table 1.

Table 1: Responses to USC's RFI dated 16 November 2022

Issue	Detail	Niche response	DD report reference
APZ zone vegetation clearance	Potential conflicts with identified heritage	A plan for the vegetation clearance works has been formulated in consultation with Niche and the required avoidance methods to avoid impacts to identified heritage. Niche is satisfied that if the avoidance and mitigation measures outlined in Table 12 and Section 1.3 of the revised DD report (submitted	Restrictions to vegetation clearance works as detailed in Section 1.3 The proposed activity

Issue	Detail	Niche response	DD report reference
		February 2023) are adhered to, then the proposed vegetation clearance within the APZ zones will not harm any identified heritage. The proposed vegetation clearance works are detailed in Section 1.3. The proposed activity and discussed in relation to the identified archaeological potential and heritage concerns raised in Table 5.	Table 5- Summary of potential impacts and recommended actions in relation to planned construction or demolition works Table 12- Summary of measures to avoid potential impacts to identified heritage sites
Site constraints plan	Overview mapping of heritage constraints	<p>A site constraints plan is provided in Figure 9 of the DD. The yellow hashed polygons depicted define the extent of the potential archaeological deposits (PAD). The red icon identifies the specific location of identified shells, the green icon are scarred trees and the cyan icon identified the identified location of the artefacts.</p> <p>Additional mapping and descriptions of these sites are provided in Appendix D (Site Cards).</p> <p>Only one previously recorded site was identified, (AHIMS ID 58-4-0921), however, the site could not be relocated during the site inspection (as detailed in Step 4 of the DD). As a cautionary approach, the area has been demarcated as a no-go area during all proposed works (Figure 11).</p> <p>Table 12 of the revised DD outlines the constraints to the proposed activity that must be observed in relation to identified heritage. Figure 11 consolidates this information visually for reference.</p> <p>Figure 9 and Figure 11 of the DD have been revised in 2023 to highlight these areas and the significance of the polygon boundaries.</p>	<p>Figure 9 and Figure 11</p> <p>Table 12- Summary of measures to avoid potential impacts to identified heritage sites</p> <p>Table 13: Recommendations</p>

Issue	Detail	Niche response	DD report reference
Figure 6 (Figure 9) hatched areas	Confusion as to the meaning of the hashed areas	The yellow hashed areas identify the spatial extent of the PADs or cautionary boundaries placed around sites. Figure 9 has been revised in 2023 to better identify the meaning of these polygons.	Figure 9
Figure 8 (Figure 11) hatched areas	Confusion as to the meaning of the hashed areas	The purple lines identify the locations that require temporary fencing to be erected if works are to be completed in proximity (prior to the commencement of all works). These areas will provide visual markers and all workers should be inducted as to their meaning and the special requirements which apply (i.e. no ground disturbance, and generally they are no-go areas).	Figure 11
Offset fencing	Further detail is required on the type of fencing and buffers required	Permitted temporary fencing may comprise the use of star pickets and hazard tape (or likewise) at the edges of the hashed areas identified in Figure 11. Where possible, star pickets should be erected within disturbed soils.	Figure 11
Shapefiles	Further detail as to the polygons identified in the shape files	All mapping in the DD has integrated either (a) client-supplied polygons provided as shapefiles and visually identified in the concept plan (provided in Appendix A of the DD) or (b) areas defined by the Niche consultant during the site inspection and subsequent revisions in ArcGIS Enterprise. Niche has supplied this data as shapefiles to other consultants associated with the project for integration in their mapping.	DD figures and Appendix A

I hope that this detail has addressed the issues raised in the RFI. Please do not hesitate to contact me (0458 001 164) should you have any questions or would like to clarify any further details of the assessment.

Yours sincerely,



Carly Todhunter
Heritage Consultant
Niche Environment and Heritage