

PART C : MANAGEMENT + IMPLEMENTATION TOOLS

Part C details management and implementation tools for the HMP in accordance with Water Corporation's Action Proposal Process.

- Chapter 10: Action Proposal Process and Implementation

Image 55: Sir John Forrest at Coolgardie, 'Turning on the Tap', 1903.

Source: State Library of Western Australia, Sir John Forrest at Coolgardie 24/Jan/1903; "Turning on the Tap" 1903. 001000D: Sir John Forrest opens Goldfields Water Supply Scheme, Coolgardie, 1903. Accessed 16.07.2024.

CHAPTER 10: ACTION PROPOSALS AND IMPLEMENTATION

10.1 STANDARD WORK

The Water Corporation's 'Action Proposal Process' for the main conduit of the GWSS comprises the following elements:

1. Permitted actions and standard work instructions.
2. Actions requiring 'self-assessment' and documentation.
3. Actions requiring a Heritage Impact Assessment (HIA) and potential referral under EPBC Act.
4. Interpretation and conservation.

10.1.1 PERMITTED ACTIONS AND STANDARD WORK INSTRUCTIONS

Work that the Water Corporation Operations Team delivers can be divided into: Planned (operational and non-operational), Maintenance and Emergency works. With emergency work, time is always the priority.

Planned and maintenance activities include the following:

- Banding/welding repairs: welding patches and/or 'bands' over the pipe. No pipe section would be removed, only welded over existing pipe and painted in a like for like colour.
- Minor valve replacements: air valves, service valves and similar.
- Inspections and mark-ups.
- Fire-break maintenance.
- Access track maintenance.
- Vegetation removal.
- Paint and coating replacement (like for like).
- Tank and reservoir cleaning and inspections.
- Building maintenance i.e. gutter cleaning, painting etc.
- Pump maintenance (Mechanical).
- Motor maintenance (Electrical).
- Cathodic protection testing and inspection.
- Asset condition assessment inspections: require pipe piece removal for testing.
- New service installs.
- Service removals/disconnections.
- Water sampling.
- Valve maintenance (Mechanical).
- Valve maintenance (Electrical).
- Chemical dosing.
- Driveway crossings to serve a single dwelling, but not including new public road crossings.

Planned works and maintenance are routine in nature and are not considered to have a significant impact on the heritage values of the GWSS. Provided the works fit within the above examples, they do not require a formal self-assessment, documentation or reporting under this HMP.



Image 56: GWSS, new air valve at Bakers Hill

Source: Water Corporation, Stuart Burnett, 2023.

10.1.2 EMERGENCY WORKS

Emergency works relate to service continuity and safety, including water quality and public safety. In such instances, works to remedy the failure take precedence over all other requirements.

Emergency work includes:

- Service continuity: ensuring customers have safe and clean drinking water flowing from their taps.
- General safety and water quality.
- Public safety.
- Damage by others: this includes vandalism, terrorism or unintended damage through vehicular impacts or other accidents.
- Failure of asset: for example pipe burst.
- Natural causes: for example bushfire or flood.

Emergency works will typically be classed as an incident.

Emergency works may proceed without prior formal assessment under the HMP due to their time-sensitive nature.

Any emergency works involving removal of greater than a single length (10 – 12m) of main conduit pipe are to be documented (photographically) and the Water Corporation Property team is to be informed. Otherwise, there are no formal requirements for documentation or reporting of emergency works under this HMP.

Where emergency works are required to be reported to the Water Corporation's Property team, the Property team must assess whether the works need to be reported or referred under The EPBC Act, and must document this decision on the Nexus File Located.

<https://nexus.watercorporation.com.au/otcs/cs.exe/app/nodes/81778748>

The Water Corporations' standard work instruction for works to the main conduit is included at [Appendix M](#). This will be updated to include additional training requirements (Refer HMP Policy 04) and list of permitted activities upon approval of this HMP.

10.2 ACTIONS REQUIRING 'SELF-ASSESSMENT' AND DOCUMENTATION

More substantial works, generally regarded to be 'development', must be assessed under this HMP.

Examples include:

- Upgrades and replacements to the main conduit.
- Demolition of the main conduit.
- Adjacent works such as new tanks or pumping stations.

Prior to commencing works within this category, a 'self-assessment' form (Refer [Appendix N](#)) must be completed by the Project Manager and be submitted to the Water Corporation's Property Team.

The purpose of this process is to determine:

1. Are the works consistent with the policies of this HMP?
2. Are any special requirements applicable for the works, such as the completion of an archaeological survey?
3. Do the works need to be referred to the Heritage Council of WA?
4. Is there a requirement for archival recording of the works?
5. Are there any special reporting or documentation requirements?
6. Do the works trigger the requirement to implement part of the Interpretation Strategy?

The completed 'self-assessment' form is to be retained as a record of the Water Corporation's decision on whether to refer an Action in accordance with The EPBC Act. This record is to be retained for the life of the EPBC Act approval 2019/8547 on the following file within the Nexus File System.

<https://nexus.watercorporation.com.au/otcs/cs.exe/app/nodes/81778748>

This will ensure Water Corporation's ability to comply with Conditions 9 and 10 (Compliance Records), 13 (Annual Reporting), and 16 – 18 (Audits) of EPBC Act approval 2019/8547.

The following are examples of Actions that would require completion of a self-assessment form, and provides a preliminary position on whether these Actions require independent heritage advice or referral under the EPBC Act.

Scenario 1:	Removal of portions of the main conduit greater than a single length (10-12m) designated for future conservation in Interpretation Strategy (still operational).
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A key pillar of the Interpretation Strategy is to conserve representative sections of the main conduit to communicate the values of the GWSS. These sections were identified through the methodology described in Chapter 7. There is a strong presumption against removing greater than a single length of main conduit pipeline within the areas and this will require independent heritage advice and potential referral under the EPBC Act. The advice and potential EPBC Act referral should consider including an alternative section of main conduit pipe for conservation or additional interpretation.

Scenario 2:	Removal of portions of non-operational main conduit (any length) that have been stabilised and conserved for heritage purposes in accordance with Interpretation Strategy (decommissioned heritage pipe).
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In the unlikely event a section of pipeline that has been conserved for heritage purposes needs to be modified or removed, the project manager shall liaise with the Water Corporation Property Team. The need to remove the pipe, options for reinstatement or replacement, and the potential need for independent heritage advice or referral under The EPBC Act are to be considered.

Scenario 3:	Removal of portions of the main conduit not exceeding a single length (10 - 12 metres) designated for conservation in the Interpretation Strategy (still operational).
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Cut ins to the pipeline may be required to install new valves, off takes and for other operational purposes including emergency works. In most cases, these minor works will be acceptable.

Scenario 4:	Removal of portions of the main conduit not designated for conservation in Interpretation Strategy.
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As EPBC Act approval 2019/8547 provides for removal of extant elements of the main conduit, removal of pipeline under Scenario 4 is generally acceptable, subject to compliance with conditions of the EPBC Act approval, this HMP and the Interpretation Strategy. The Water Corporation Property Team will provide advice to the Project Manager on interpretation, archival recording and any other requirements of the HMP, as part of completion of the self-assessment form.

Scenario 5:	Installation of new below ground pipe.
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The installation of new below ground pipe is not likely to impact the National Heritage values of the GWSS and is generally acceptable. Even though approval under the EPBC Act is unlikely to be required under scenario 5, referral of a 'Self-assessment' form is required to address potential requirements under the Heritage Act 2018 or if special requirements of this HMP apply.

Scenario 6:	Development of new structures within 50 metres of the main conduit.
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Any development within proximity of the GWSS, such as new tanks or pumping stations, has potential to impact its setting and the National and State Heritage values. In this scenario a 'self- assessment' form should be prepared for discussion with the Water Corporation Property Team. While development of new operational infrastructure is generally compatible with the heritage values of the GWSS, approval may be required in some instances under State or Commonwealth legislation, and it may be appropriate to seek external advice for more significant proposals.

10.3 ACTIONS REQUIRING HERITAGE IMPACT ASSESSMENT (HIA) AND POTENTIAL REFERRAL UNDER EPBC ACT.

The purpose of the 'self-assessment' process is for Water Corporation to determine whether an action is likely to have a significant impact on the National Heritage values of the GWSS and should be referred for assessment in accordance with the EPBC Act. Works that are inconsistent with the policies of this HMP, as determined through the self-assessment process, require a Heritage Impact Assessment to be prepared by a suitably qualified heritage consultant that is external to and independent from the Water Corporation.

In addition to preparing an HIA, the consultant may provide advice on ways to mitigate the impacts of the works on the heritage values of the GWSS. The HIA is to provide advice on whether the works have potential to impact National Heritage values of the GWSS and require referral in accordance with the EPBC Act.

The Water Corporation Property team is to assist in management of this process. The outcome of the HIA process, including the decision whether to refer an Action under The EPBC Act, are to be documented on the following file Nexus File Location.

<https://nexus.watercorporation.com.au/otcs/cs.exe/app/nodes/81778748>

See Figure 36 and 37 EPBC Act Referral and Assessment flow chart below for further details.

10.4 INTERPRETATION AND CONSERVATION

As this HMP will implement an Action to remove the extant main conduit, it has a heavy focus on interpretation, but also identifies several strategic locations where it is proposed to conserve main conduit pipe in perpetuity.

The mapping included in Chapter 7, Part 7.4, identifies a total of 27 sites along the main conduit between Mundaring and Kalgoorlie. Of these sites:

- 13 sites have been identified where it is proposed to conserve main conduit pipe in perpetuity, for the reasons outlined in Chapter 7. While it may not be necessary to replace main conduit pipe in these locations for many years, where asset condition or capacity factors determine a need to upgrade the pipe, the extant pipe will be conserved in situ and stabilised as per the Technical Note at Appendix I. The new upgraded pipe will be located adjacent to the stabilised pipe, typically below ground. Subject to consultation with the Department responsible for administering The EPBC Act, new aboveground pipe may be constructed on the same alignment, in lieu of conserving the extant pipe. Additional interpretation may be required when the pipe fabric is considered to be of particular importance. Refer Policies 04 – 06 of this HMP.
- 14 'presented sites' have been selected where it is proposed to 'present' sections of 'heritage pipe' in an educational manner, typically with signage detailing stories of the GWSS and / or linking with interpretation projects from the Interpretation Strategy. The 'presented sites' will be located close the current alignment of the main conduit. 'Interpretation Policy Areas' have been captured on each of the maps. Where pipe upgrade projects that entail demolition of the extant main conduit to fall within these policy areas, the relevant project will fund and implement the 'presented site'.

As per Policy 18 of this HMP, Interpretation Policy Areas will be captured within the Water Corporation's Corporate GIS to ensure that conservation and interpretation policy requirements are visible for the life of EPBC Act approval 2019/8547. The time-frame for implementation of other elements of the interpretation is detailed in the Interpretation Strategy and will be typically be undertaken in association with major upgrades to the main conduit.



Image 57: Image of GWSS pipe valve interpretation

Source: 'Image of GWSS pipe valve interpretation', photograph taken near Mundaring, Courtesy of: Stephen Carrick Architects, 2024.

10.5 EPBC ACT ASSESSMENT PROCESSES- REFERRAL

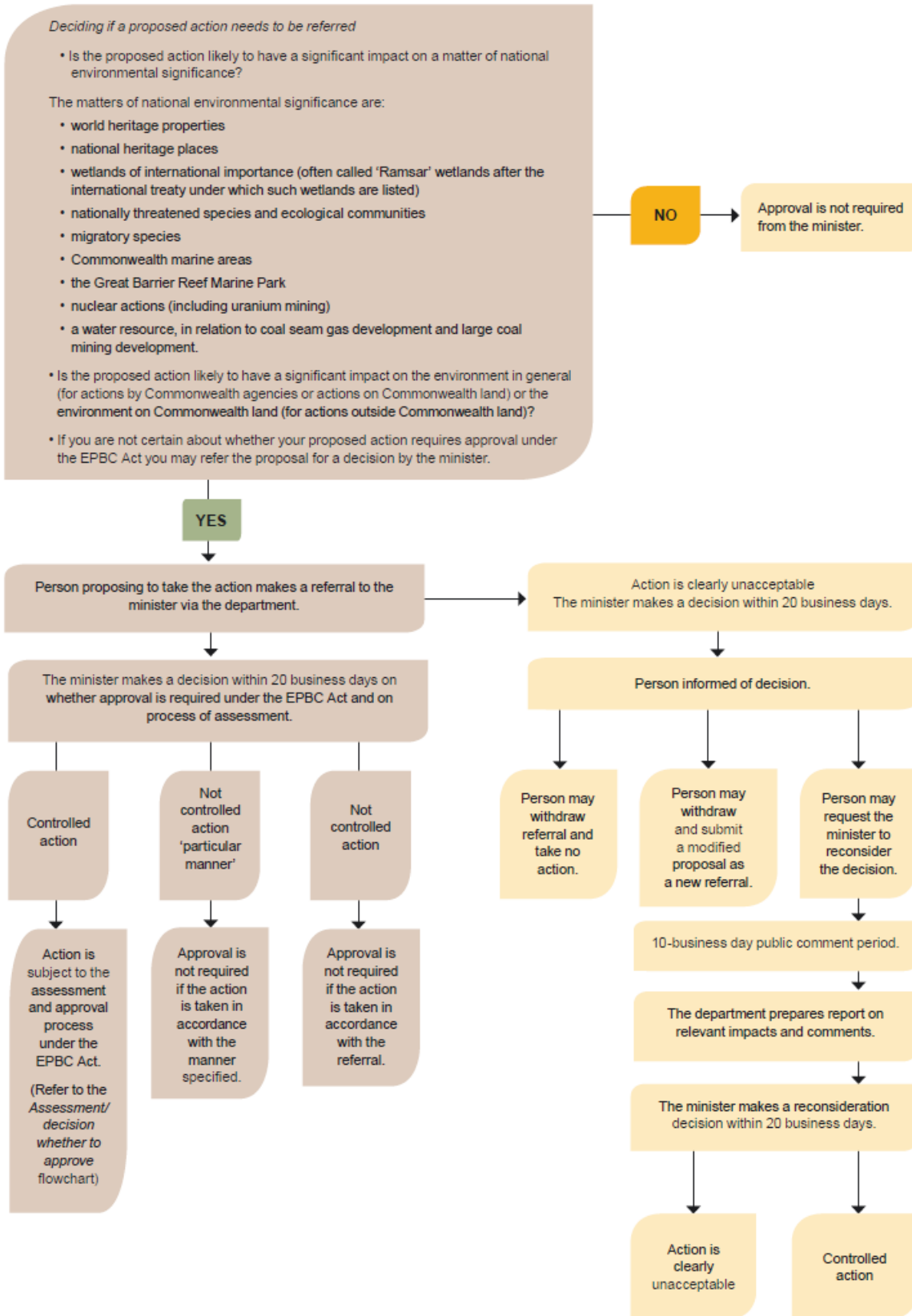


Figure 36: EPBC Action Environment Assessment Process

EPBC Action Environment Assessment Process- Assessment Decision Whether to Approve (Source: DCCEEW website)

10.6 EPBC ACT ASSESSMENT PROCESSES- DECISION WHETHER TO APPROVE

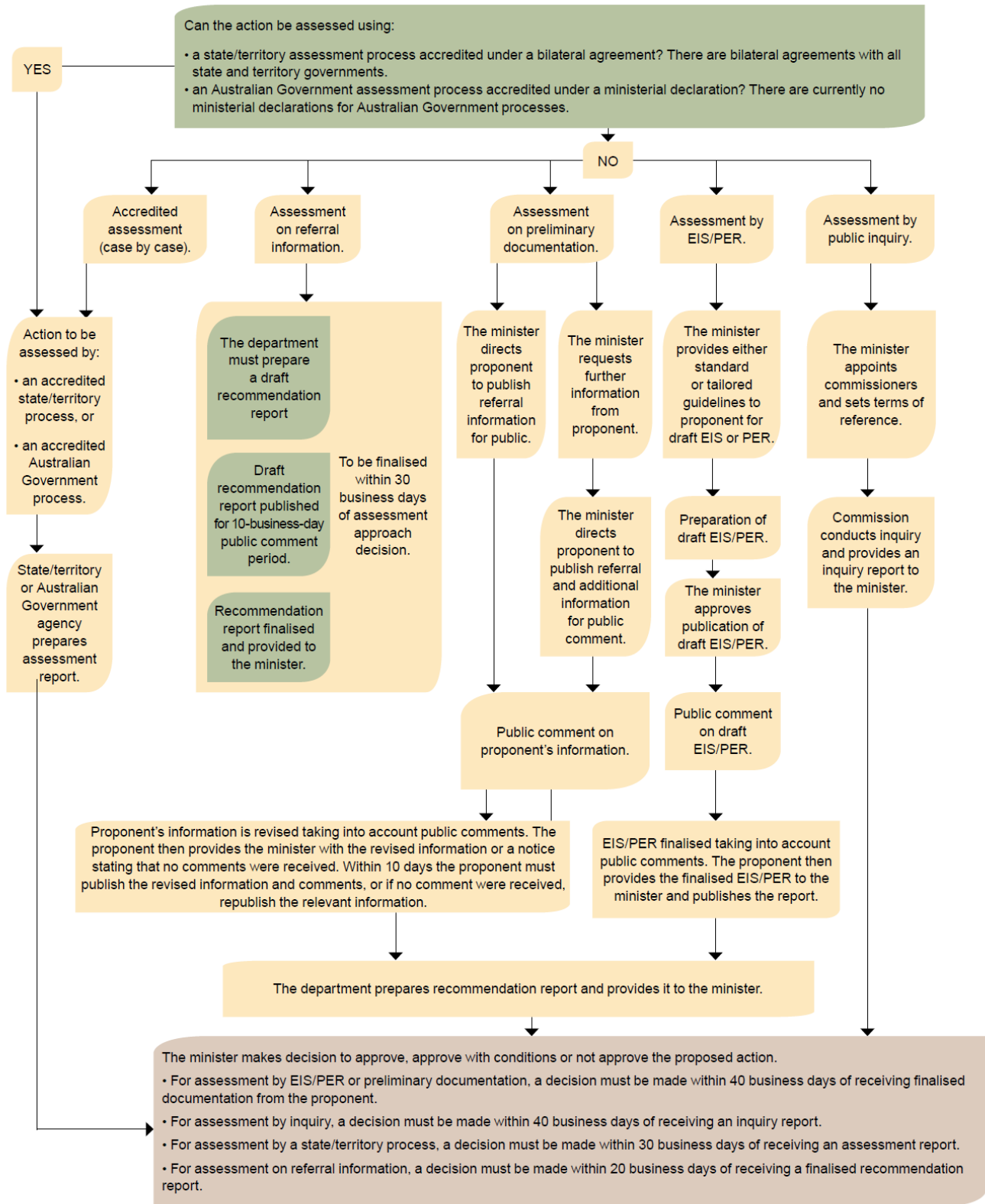


Figure 37: EPBC Action Environment Assessment Process

EPBC Action Environment Assessment Process- Assessment Decision Whether to Approve (Source: DCCEEW website)