1 **Introduction**

My firm, Andrew Long + Associates Pty Ltd, prepared the impact assessment report titled *Mordialloc Bypass Project: Historical Cultural Heritage Impact Assessment (Report)* which is included as Appendix I to the Environment Effects Statement (EES) for the Mordialloc Bypass Project (Project).

The role that I had in preparing the Report was **author**. One other significant contributor to the Report was Paul Pepdjonovic and their expertise is set out as follows:

Paul Pepdjonovic is a senior project manager at Andrew Long + Associates and has extensive experience in preparing historical cultural heritage assessments.

I adopt the Report, in combination with this document, as my written expert evidence for the purposes of the Mordialloc Bypass Project Inquiry and Advisory Committee’s consideration and reporting in respect of the Project.

2 **Qualifications and experience**

Appendix A contains a statement setting out my qualifications and experience, and the other matters in accordance with Planning Panels Victoria’s ‘Guide to Expert Evidence’.

A copy of my curriculum vitae is provided in Appendix B.

3 **Further work since preparation of the Report**

Since the Report was finalised, I have reviewed the alternative design arrangements at Woodlands Drive and can confirm that this alternative design does not entail an increased impact or risk to historical cultural heritage.

ALA was not involved in the preparation of the PSA documents. We have viewed the proposed amendment to the curtilage and are satisfied that the proposed reduced curtilage effectively encompasses the significant elements of the place without unduly retaining surrounding land which has been substantially altered and modified since the original construction and operation of the Braeside Sewage Treatment Plant terminated.

4 **Written Submissions**

4.1 **Submissions Received**

I have read the public submissions in respect of the EES and draft Planning Scheme Amendment for the Project and identified those that are relevant to the Report and my area of expertise. These include the following submissions:

- Submission 40
- Submission 71

4.2 **Summary of Issues Raised**

The submissions have raised the following issues relevant to my area of expertise:
Submission 40.

- Notes the heritage values of Braeside Park and notes among other matters, Parks Victoria’s interests in the ‘viability of Parks Victoria continuing operations from the existing park office (brick building under heritage overlay)’.
- Notes the requirements for consultation and engagement under EPR H3 to ensure park operations and user safety are considered when and if work to the park office are needed.
- Supports MRPA intent to work with Kingston City Council to amend HO104 curtilage extent.

Submission 71.

- Notes original alignment which would have impacted the park office (HO104)
- Notes appropriateness of change of alignment which leaves park office unimpacted.

4.3 Response to Issues Raised

The submissions noted above make comments about the historical heritage matters insofar as they note outcomes which have occurred within the process to date and or make statements of fact. In doing this, they do not raise matters which change my views, or which require specific direct response. On this basis, it is my opinion that the EPRs and the report as a whole remains valid.

Declaration

I have made all the inquiries that I believe are desirable and appropriate and no matters of significance which I regard as relevant have to my knowledge been withheld from the Inquiry and Advisory Committee.

Signed

Date: 12th February 2019
Appendix A  Matters Raised by PPV's Guide to Expert Evidence

(a) The name and address of the expert

Jonathan Howell-Meurs (1/320 Drummond Street, Carlton, 3053)

(b) The expert's qualifications and experience

Ba. Hons 1994 University of Melbourne
MA 1997 University of Melbourne

(c) A statement identifying the expert's area of expertise to make the report

Jonathan Howell-Meurs has over 20 years’ experience working in cultural heritage management and has undertaken numerous assessments in relation to proposed developments.

(d) A statement identifying any other significant contributors to the report and where necessary outlining their expertise

Paul Pepdjonovic, senior project manager at Andrew Long + Associates Pty Ltd was principal author of the report and has had extensive experience in historical heritage assessments.

(e) All instructions that define the scope of the report (original and supplementary and whether in writing or oral)

(insert)

(f) The identity of the person who carried out any tests or experiments upon which the expert has relied on and the qualifications of that person

NA

(g) A statement setting out any questions falling outside the expert's expertise

NA

(h) A statement setting out any key assumptions made in preparing the report

The report was prepared on the basis of spatial information provided by MRPA through WSP and no allowance is made for errors in that data. The assessment has not undertaken detailed historical research for the project area insofar as detailed ownership research and similar has not been undertaken.

(i) A statement indicating whether the report is incomplete or inaccurate in any respect

NA
Consultant Resumé

Jonathan Howell-Meurs, BA (hons.), MA
Executive Director
Andrew Long & Associates Pty Ltd,
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BH 03-9470-9222, Mobile 0412-450-015
Email: jon@alassoc.com.au

Higher Qualifications:
(1997) Master of Arts, Department of Classics and Archaeology, University of Melbourne
(1994) Bachelor of Arts (Honours), Major in Archaeology, University of Melbourne

Jonathan Howell-Meurs has over 15 years professional experience in archaeological and heritage consulting in Victoria providing expert advice regarding both Aboriginal and European heritage.

Since joining Andrew Long & Associates in 2001 Jonathan has managed a wide variety of cultural heritage assessments. With a professional focus in primary historical research, predictive modeling and urban archaeology he provides innovative and solid leadership in the company’s ongoing development of survey and site mitigation strategies.

Areas of Specialisation:
- Detailed Historical and Aboriginal Heritage Management Documents
- Planning and Aboriginal cultural heritage
- Urban Archaeological Planning and Excavation
- Primary historical research
- Production of cultural heritage management plans
- Predictive modeling

Professional Experience:

2013-2019       Executive Director, Andrew Long & Associates

2008-2013       Associate, Andrew Long & Associates
Manager of Planning Team. Responsible for high level client and stakeholder consultation. Planning investigations, expert witness services, high level assessments.

Responsible for managing and carrying out cultural heritage assessments and management plans for government agencies (e.g. City of Melbourne, Parks Victoria, VicRoads, Hobart City Council, Department of Primary Industries, Water & Environment - Tasmania,) and private sector clients (e.g. Santos; Gasnet P/L; TRUenergy P/L; Earth Tech P/L, Sinclair Knight Merz P/L). This position required project management, co-ordination of sub-consultants, liaising with clients, consultation with government agencies and construction personnel, developing survey strategies based on client requirements and local conditions, undertaking background research, desktop assessments, predictive modelling, surveys, site recording, test excavation and excavation and fulfilling reporting requirements to a high standard.

Tasks involved the development and implementation of site mitigation strategies including the excavation and monitoring of disturbances to sites where ongoing works were taking place or where alternatives to site destruction were not available. Background research and reporting formed substantial components of this work.