

Waterloo Integrated Station Development

Heritage Management Plan

SMCSWSWL-JHG-SWL-EM-PLN-000004

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Table of Contents

Glossary	4
1 Introduction	5
1.1 Purpose	5
1.2 Background.....	5
1.3 Overview of the Waterloo ISD	5
1.4 Objectives	6
1.5 Consultation.....	6
1.6 Interactions with other Management Plans.....	7
1.7 Approval of this Plan.....	8
2 Legal and Other Requirements	9
2.1 Legal Requirements.....	9
2.2 Guidelines.....	9
3 Existing Environment	11
4 Key Personnel	14
5 Heritage Context	16
5.1 Non-Aboriginal Heritage assessment	16
5.2 Aboriginal Heritage Assessment.....	17
6 Construction Impacts and Management	18
6.1 Specific Management Requirements.....	18
6.2 Salvage.....	19
6.3 General Measures	19
7 Unexpected Heritage Finds	21
7.1 Unexpected Finds Procedure	21
8 Heritage Interpretation and Reporting	22
8.1 Photographic and Archival Recording	22
8.2 Archaeological Method Statements	22
8.3 Reporting	23
8.4 Heritage Interpretation Plan.....	23
9 Auditing and Inspections	25
9.1 Auditing.....	25
9.2 Inspections.....	25
10 Review and Improvement	26
11 Enquires, Complaints and Incident Management	27

Appendix A– Compliance Matrix 28
Appendix B Stakeholder consultation 34
Appendix C Sydney Metro Unexpected Heritage Finds Procedure 35

Glossary

Term	Explanation
AHD	Australian Heritage Database
AHIMS	Aboriginal Heritage Information Management System
AMS	Archaeological Method Statement
ARMP	Archaeological Relic Management Plan
CEMF	Construction Environmental Management Framework
CEMP	Construction Environmental Management Plan
CoA	Conditions of Approval
CSSI	Critical State Significance Infrastructure
DPIE	Department of Planning, Industry & Environment
ECM	Environmental Control Map
EIS	Environmental Impact Statement
ER	Environmental Representative
HIA	Heritage Impact Assessment
HMP	Heritage Management Plan
ISD	Integrated Station Development
Minister, the	NSW Minister for Planning
OEH	Office of Environment and Heritage
RAPs	Registered Aboriginal Parties
REMMs	Revised Environmental Mitigation Measures
SDPP	Station Design and Precinct Plans
SMCSW	Sydney Metro City and Southwest
SWTC	Scope of Work and Technical Criteria
TSE	Sydney Metro Tunnel and Station Excavation Contractor

1 Introduction

1.1 Purpose

John Holland has prepared this Heritage Management Plan (HMP) to describe how heritage will be managed during the construction of the Waterloo Integrated Station Development (ISD).

This HMP forms part of the Construction Environmental Management Plan (CEMP) for Waterloo ISD. It has been prepared to address the relevant requirements of Sydney Metro's Construction Environmental Management Framework (CEMF), the Revised Environmental Mitigation Measures (REMMs), the Project Planning Approval, applicable legislation, and contractual requirements, including the Project Deed and Scope of Work and Technical Criteria (SWTC).

This Plan will be submitted for approval to the Secretary of the Department of Planning, Industry and Environment (DPIE) no later than one (1) month before commencement of Construction of the Waterloo ISD. Construction will not commence until the CEMP and sub-plans (including this Plan) have been approved.

1.2 Background

The Waterloo ISD is located within South Sydney local area in the suburb of Waterloo. The site is situated approximately 3 kilometres from the CBD on one city block bounded by Botany Road to the west, Raglan Street to the north, Cope Street to the east, and Wellington Street to the south.

This Plan builds on the Aboriginal and non-Aboriginal heritage assessments undertaken in the Environmental Impact Statement (EIS) and Submissions, Preferred Infrastructure Report and Archaeological Method Statements and Preliminary Archaeological Investigation Reports produced by the Sydney Metro Tunnel and Station Excavation (TSE) Contractor.

1.3 Overview of the Waterloo ISD

The Waterloo ISD works under the Project Planning Approval include the design and construction of the Waterloo Metro Station and associated infrastructure. Section 2 of the CEMP provides a detailed description of the works to be completed. In addition to the station works the following will be completed:

- Local area works involving resurfacing or reconstruction of affected roads, footpaths, cycle ways etc
- Utility service works, including the undergrounding of low voltage powerlines, installation of new services to connect to the new facilities
- Property works to existing buildings that are affected by the project
- Retail works to the spaces in the Waterloo Station and precinct
- Enabling works for the over-station development.

The Waterloo ISD will include future over-station development, however the over-station development component is not subject to this Project Planning Approval and therefore does not form part of the scope for the Waterloo ISD as outlined in the CEMP or the Sydney Metro Staging Report.

1.3.1 Temporary works

The proposed temporary works include:

- Site compound, amenities and services establishment, use and demobilisation
- Hoarding, security fencing, handrails and gantry
- Vehicular accesses and diversions
- Piling and crane platforms
- Construction signage
- Traffic and pedestrian management devices
- Lighting
- Existing services protection
- Lay-down and storage areas
- Stockpile areas
- Scaffolding and access platforms
- Formwork and falsework systems and
- All other temporary works and measures required for the construction of the Works.

1.4 Objectives

The following heritage management objectives will be applied to the Waterloo ISD works:

- Implement measures to appropriately manage all known Aboriginal and historic heritage items that may be impacted by the works
- Implement Sydney Metro's Unexpected Heritage Finds Procedure (SM-18-00105232) to avoid accidental impacts on heritage items, places or value.
- Carry out training to maximise awareness of Aboriginal and historic heritage relevant to the works (including unexpected finds)
- Identify, investigate, record and assess the significance of any discovered Aboriginal and historic heritage items including any cultural features
- Avoid harm, destruction and defacement of human remains, including Aboriginal burials in accordance with the Sydney Metro Exhumation Management Plan (CoA E27).

1.5 Consultation

The Project Planning Approval requires the HMP be prepared in consultation with the Heritage Council (or its delegate) and relevant Council(s) which is City of Sydney for Waterloo ISD.

The key stakeholders related to heritage who have been consulted with during the development of this HMP include:

- Heritage Council
- City of Sydney Council

The likelihood of encountering Aboriginal artefacts has been assessed and determined to be 'low' for the Waterloo ISD. This is based on the previous investigations undertaken during the TSE works. As such consultation with the Registered Aboriginal Parties (RAPs) has not been included as part of this plan. Note, consultation with the RAPs will occur during the preparation of the site specific heritage interpretation plan.

Comments received from the stakeholders (along with John Holland's response) are detailed in Table 1 and Appendix B. Where appropriate, this Plan has been updated to address these comments.

Table 1: Consultation Summary

Condition	Agency Consultation	Requirements and date submitted	Key Issues Raised	HMP Section Reference
C3	City of Sydney	Response received 09/06/2020	Refer Appendix B	Section 6.1
C3	Heritage Council (or delegate)	Consultation on plan requested 18/05/2020; Follow-up emails on 01/06/2020; 15/06/2020	No response	n/a
C3	OEH (Aboriginal)	Response received 18/06/2020	No comments	n/a

Consultation records will be maintained for the project to detail any correspondence or ongoing consultation undertaken as part of the requirements of this HMP. These logs will be kept separately to this HMP and provided to DPIE for information.

1.6 Interactions with other Management Plans

This Plan has the following interrelationships with other management plans and documents:

- Construction Environmental Management Plan: overarching environmental management plan.
- Construction Noise and Vibration Management Plan and associated Construction Noise & Vibration Impact Statement: details predicted vibration impacts and site specific mitigation measures the Waterloo ISD including monitoring requirements for the Congregational Church and other locally sensitive buildings.
- Waterloo ISD Community Communication Strategy
- Environmental Control Maps (ECMs) will be prepared progressively for the site and include relevant heritage management measures.

1.7 Approval of this Plan

This plan will be reviewed by Sydney Metro, endorsed by the Environmental Representative (ER) and submitted to the Secretary of DPIE for approval in accordance with Project Planning Approval Condition C8.

2 Legal and Other Requirements

2.1 Legal Requirements

As the Project is Critical State Significant Infrastructure (CSSI), the requirements of the *Heritage Act 1977* and the *National Parks and Wildlife Act 1974* are being assessed under Part 5.1 of the *Environmental Planning and Assessment Act 1979*. This is addressed in the Project Planning Approval and no separate permits will be required.

The key planning requirements from the Project Planning Approval (Chatswood to Sydenham) and Revised Environmental Management Measures (REMMs) and the Construction Environmental Management Framework (CEMF) are summarised in the Compliance Matrix (Appendix A).

The Plan addresses applicable requirements within the following documents:

- The Sydney Metro City and Southwest – Project Approval – Determination, dated 9th January 2017 and associated modifications
 - CSSI 7400 MOD 1 – Victoria Cross and Artarmon Substation (determined 18 October 2017)
 - CSSI 7400 MOD 4 – Sydenham Station and Metro Facility South (determined 13 December 2017)
 - CSSI 7400 MOD 2 – Central Walk (determined 21 December 2017)
 - CSSI 7400 MOD 3 – Martin Place Metro Station (determined 22 March 2018)
 - CSSI 7400 MOD 5 – Blues Point Acoustic Shed (determined 2 November 2018)
 - CSSI 7400 MOD6 – Administrative Changes (determined 21 February 2019)
- The Sydney Metro City and Southwest - Environmental Impact Statement, dated 3rd May 2016;
- Sydney Metro City & Southwest - Chatswood to Sydenham Staging Report, Rev 6, dated 2nd July 2019;
- Sydney Metro City & Southwest Sustainability Strategy
- John Holland Waterloo ISD Sustainability Management Plan
- Construction Environmental Framework, Chatswood to Sydenham, Feb 2017

2.2 Guidelines

Additional relevant guidelines and standards relating to the management of Aboriginal and historic heritage include:

- Code of Practice for the archaeological investigation of Aboriginal objects in NSW (OEH, 2010)
- Aboriginal cultural heritage consultation requirements for proponents 2010 (OEH, 2010)
- Guide to investigating, assessing and reporting on Aboriginal cultural heritage in NSW (OEH, 2011)

- Assessing Significance for Historical Archaeological Sites and Relics (NSW Heritage Branch, Department of Planning, 2009)
- NSW Heritage Manual 1996 (Heritage Office and Department of Urban Affairs and Planning, 1996)
- Assessing Heritage Significance (NSW Heritage Office, 2001)
- Levels of Heritage Significance (NSW Heritage Office, 2008)
- Statements of Heritage Impact (Heritage Office, 2002)
- NSW Government's Aboriginal Participation in Construction Guidelines (2007)
- How to Prepare Archival Recording of Heritage Items (Heritage Branch 1998)
- The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance (Australia ICOMOS, 2013)
- Heritage Platforms Conservation Management Strategy, (Sydney Trains, 2015)
- Canopies and Shelters, Design Guide for Heritage Stations, Sydney Trains (December 2016)
- Design in Context Guidelines for Infill Development in the Historic Environment (NSW Heritage Office, 2006)
- NSW Heritage Council's Criteria for Assessment of Excavation Directors (2011)
- NSW Heritage Council's Assessing Significance for Historical Archaeological Sites and Relics (2009)
- NSW Heritage Office Archaeological Assessments (1996)
- Office of Environment and Heritage's Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (2011)
- Office of Environment and Heritage's Aboriginal cultural heritage consultation requirements for proponents 2010 (DECCW 2010)
- NSW Heritage Council's Photographic Recording of Heritage Items Using Film or Digital Capture (2006) guidelines
- NSW Heritage Office Guidelines for Management of Human Skeletal Remains (1998)

3 Existing Environment

The impacts on heritage items within the vicinity of the Waterloo ISD were assessed as part of the EIS and later during the construction activities completed by the Sydney Metro TSE Contractor. The EIS identified a number of heritage items located within the study area, refer to Table 2 for an overview of the heritage items and Figure 1 for details of the study area.

The EIS (2016) describes the Waterloo ISD site as being located across the north western portion of a large quaternary sand sheet. The majority of the Eastern Suburbs from Waterloo east to the ocean coastline and south to Botany Bay was originally an undulating series of sand dunes. A review of the Aboriginal Heritage Information Management System (AHIMS) was completed during the preparation of the EIS (2016) which confirmed there are no recorded Aboriginal sites located within 100 metres of the Waterloo ISD. The closest recorded site is AHIMS site 45-6-2597, an artefact and shell midden site located approximately 275 metres to the north.

Table 2: Heritage listed items identified in the Heritage Impact Assessment (EIS 2016)

Ref No.	Heritage Item	Registered listings	Significance	Relationship to the study area
12069	Congregational church including interior	Sydney LEP 2012	Local	Within construction area
15	Former CBC Bank including interior	Sydney LEP 2012	Local	Partially within buffer zone
12070	Cauliflower Hotel including interior	Sydney LEP 2012	Local	Partially within buffer zone
	Alignment Pin, Waterloo (SE corner Wellington Street and Botany Road)	RMS s170	Local	Within buffer zone

Based on the archaeology identified during the station box excavation, Table 3 identifies the heritage potential that could be uncovered during excavation of the area to the west of the station box, located in the yellow shaded section of Figure 2. Excavation of this section of the site is not expected to be required for the Waterloo ISD as it is not currently included in the scope of the project.

Table 3: Potential heritage find (AMBS)

Site	AMBS Archaeological Potential & Strategy	AARD Archaeological Potential & Strategy
Waterloo ISD	1893 Sydney Water plan indicates possible early cottages Monitor, test, assess, salvage	Evidence of c.1880s residential, commercial and light industrial development Monitor, test, salvage if significant

Figure 1: Location of heritage listed buildings



The existing environment and heritage context of the Waterloo ISD has been broadly assessed in the following Technical Reports included in the EIS

- Chatswood to Sydenham Environmental Impact Statement (May 2016) Technical Paper 4: Non-Aboriginal Heritage Impact Assessment, prepared by Artefact Heritage
- Chatswood to Sydenham Environmental Impact Statement (May 2016) Technical Paper 5: Aboriginal Heritage - Archaeological Assessment, prepared by Artefact Heritage

Additional reports prepared are listed in Table 4.

Table 4: Heritage Reports for Waterloo

Source	Date	Title	File name
Artefact	1/10/2016	Historical Archaeological Assessment & Research Design	09a Sydney Metro C2S SPIR Appendix H Historical Archaeological Assessment
Artefact	2/10/2016	Historical Archaeological Assessment & Research Design	09b Sydney Metro C2S SPIR Appendix H Historical Archaeological Assessment
Artefact	1/10/2016	Aboriginal Cultural Heritage Assessment	10 Sydney Metro C2S SPIR Appendix I Aboriginal Cultural Heritage
AMBS Ecology and Heritage	1/11/2017	Sydney Metro, City & Southwest Archaeological Method Statement for Waterloo Station	SMCSWTSE-JCG-SWL-EM-REP-002072.00.REV.00.01
AMBS Ecology and Heritage	11/07/2018	Summary report on the historical archaeological investigations at the Waterloo Station Site	Waterloo Preliminary Archaeological Assessment Report
Urbis (Urban Growth)	22/10/2018	Heritage Impact Statement	Waterloo Metro Quarter State Significant Precinct Study Attachment 10 heritage study
SDD Schedule C2		Heritage Strategy for Waterloo	NWRLSRT-MET-SWS-HE-REP-000001
SDD Schedule C4		MQD Indigenous Cultural Heritage	MQD Indigenous Cultural Heritage

4 Key Personnel

John Holland will engage a Heritage Consultant to carry out key heritage works for the Waterloo ISD. The roles and responsibilities for key personnel, including this consultant are outlined in Table 5.

Table 5: Roles and responsibilities of key personnel

Role	Responsibility for heritage management
Project Director	<ul style="list-style-type: none"> ▪ Managing the delivery of the Waterloo ISD including overseeing implementation of heritage management measures ▪ Act as Contractor's Representative
Environment & Sustainability Manager	<ul style="list-style-type: none"> ▪ Oversee the implementation of all heritage management initiatives ▪ Responsible for managing ongoing compliance with the CoA and environmental document requirements
Engineering Manager	<ul style="list-style-type: none"> ▪ Ensure heritage requirements are considered throughout the design phase
Construction Managers Site Superintendent	<ul style="list-style-type: none"> ▪ Manage the delivery of the construction process, in relation to heritage management across the site in conjunction with the Environment & Sustainability Manager
Sustainability Manager	<ul style="list-style-type: none"> ▪ Track and report heritage elements against sustainability targets
Environment & Sustainability Coordinator	<ul style="list-style-type: none"> ▪ Manage the on-ground application of heritage management measures during construction
Project Engineer	<ul style="list-style-type: none"> ▪ Implement heritage management requirements during construction works
Environmental Representative	<ul style="list-style-type: none"> ▪ Receive and respond to communications from the Secretary in relation to the environmental performance of the Critical State Significant Infrastructure (CSSI); ▪ Consider and inform the Secretary on matters specified in the terms of the planning approval; ▪ Consider and recommend any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community; ▪ Review all documents required to be prepared under the terms of the planning approval, ensure they address any requirements in or under the planning approval and if so, endorse them before submission to the Secretary (if required to be submitted to the Secretary) or before implementation (if not required to be submitted to the Secretary); ▪ Regularly monitor the implementation of all documents required by the terms of the planning approval for implementation in accordance with what is stated in the document and the terms of the planning approval; ▪ Review the Proponent's notification of incidents in accordance with Condition A41 of this approval; ▪ As may be requested by the Secretary, help plan, attend or undertake Department audits of the CSSI, briefings, and site visits; ▪ Consider any minor amendments to be made to the CEMP, CEMP sub-plans and monitoring programs that comprise updating or are of an administrative nature, and are consistent with the terms of the planning approval and the CEMP, CEMP sub-plans and monitoring programs approved by the Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of the planning approval; ▪ Perform the roles under CoA A24

Role	Responsibility for heritage management
<p>Archaeological Excavation Director (will be engaged if excavation required that may result in impacts to heritage)</p>	<ul style="list-style-type: none"> ▪ Must complete project induction covering John Holland environmental management system <hr/> <ul style="list-style-type: none"> ▪ The Excavation Director must be suitably qualified and who complies with the Heritage Council of NSW's Criteria for Assessment of Excavation Directors (July 2011) to oversee and advise on matters associated with historic archaeology and advise the Heritage Council of NSW (or its delegate). ▪ Advise Sydney Metro of any relic of state significance if identified to allow Sydney Metro to inform the Secretary as required by E20. ▪ The Excavation Director must be present to oversee excavation and advise on archaeological issues. ▪ The Excavation Director has the authority to advise on the duration and extent of oversight required as informed by the provisions of the approved AARD and Excavation Methodology. ▪ Implement the Aboriginal Cultural Heritage assessment in the event excavation is required that is likely to impact on Aboriginal heritage.
<p>Heritage specialist</p>	<ul style="list-style-type: none"> ▪ Responsible for providing advice to minimise potential impacts to any built heritage values during the construction activities
<p>All project personnel</p>	<ul style="list-style-type: none"> ▪ All project personnel to undertake toolbox talks in relation to the reporting process for unexpected finds. ▪ Undertake relevant training to implement the requirements of this HMP

5 Heritage Context

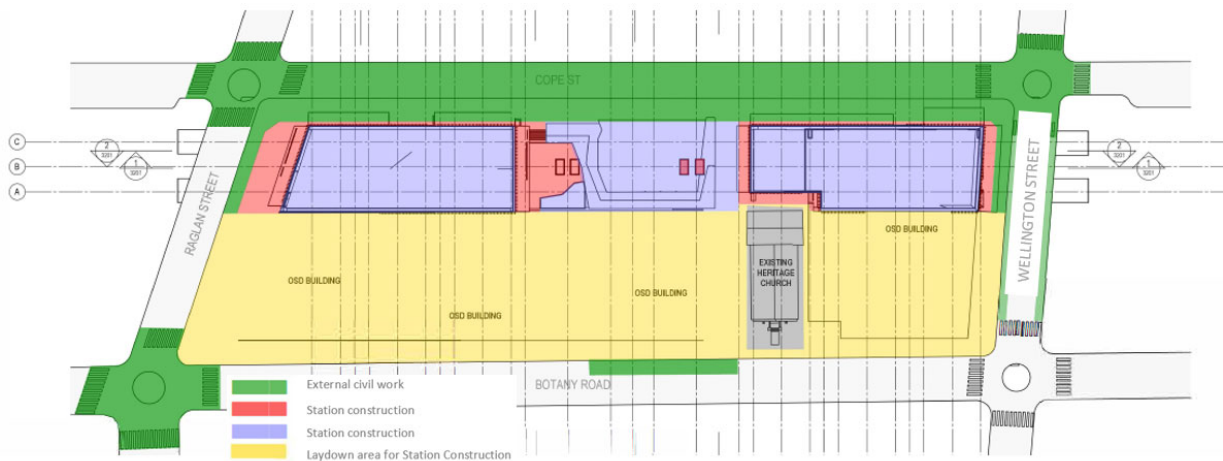
5.1 Non-Aboriginal Heritage assessment

The scope of the Waterloo ISD is unlikely to have a direct impact on non-aboriginal heritage items. The TSE Contractor has previously managed heritage aspects in accordance with the TSE Construction Heritage Management Plan.

Archaeological investigations have been previously carried out within the station box footprint, represented as red and purple in Figure 2.

Excavation of the extended site footprint (refer Figure 2 yellow shading) has potential to expose evidence of early occupation and settlement. The excavation of this area will be completed at a later stage, by others, and is not part of the scope of this Plan.

Figure 2: Waterloo ISD location and extent of work



The EIS (2016) included a detailed heritage impact assessment (HIA) for the known heritage items in the Waterloo study area as described in Figure 1. The findings are summarised in Table 6.

Table 6: Heritage Impact assessment outcome

Item	Significance	Relationship to the study area	HIA
Congregational Church (including interior)	Local	Within construction area	As the bulk of the new station would be located to the rear of the heritage item, and the heritage item is oriented to the west and away from the station site, demolition of existing buildings and construction of new station entrances would have a minor impact on the setting of the heritage item. Indirect impact: Minor
CBC Bank (including interior)	Local	Partially within buffer zone	Proposed station buildings to the east of the heritage item would result in minor visual impacts through the

Item	Significance	Relationship to the study area	HIA
			demolition of existing buildings and the introduction of new station entrances. Indirect impact: Minor
Cauliflower Hotel (including interior)	Local	Partially within buffer zone	Demolition of existing structures to the north-east of the heritage item would result in minor visual impacts through alteration of the existing streetscape. The existing buildings do not contribute to the heritage significance of the hotel. Indirect impact: Minor
Alignment pin	Local	Within buffer zone	No impacts

All archaeology associated with station box has been completed by the TSE Contractor, however, minor excavation work within the study area will be required for Waterloo ISD during utility work. The impact associated with the utility work is expected to be low with potential impacts managed in accordance with the Sydney Metro Unexpected Heritage Finds Procedure.

5.2 Aboriginal Heritage Assessment

The EIS (2016) assessed the potential for Aboriginal Heritage at the Waterloo Metro Site. The outcome of the assessment determined no identified Aboriginal sites would be impacted by the proposed Waterloo Station works. There is potential for Aboriginal objects to occur in the sub-surface archaeological deposits where there are surviving portions of A horizon sands.

The TSE Contractor has previously completed the excavation and ground disturbance required for construction of the Station. This was managed in accordance with the TSE Construction Heritage Management Plan.

Excavation of the extended site footprint (refer Figure 2 yellow shading) has potential to expose evidence of Aboriginal Heritage. The excavation of this area will be completed at a later stage and is not part of the scope of this Plan. Refer to Figure 2 for details of the area of impact.

6 Construction Impacts and Management

As identified in Section 5, direct impacts to Aboriginal or non-Aboriginal heritage is unlikely as a result of construction. However, where the risk of construction is determined to have an impact through further assessment of the construction method (e.g. location and depth of excavation), advice from the Waterloo ISD heritage specialist would be obtained and may include the following:

1. Archival recording and salvage of any heritage items to be demolished or modified
2. Delineating (fencing off) to protect any heritage items and installation of protection measures required to mitigate potential impacts on directly adjacent heritage items
3. Monitoring as required by the Noise and Vibration Management Plan to minimise impacts on heritage items that are to be retained.

6.1 Specific Management Requirements

As the Congregational Church at 103–105 Botany Road, Waterloo, is located within the site boundary, specific management measures will be in place to prevent direct impacts. The characteristics of the church structure include the following:

- *The church is constructed of rendered brick set in a lime mortar on sandstone block foundations. The foundations are sitting on dense sand and lime mortar, which is quite flexible, but there is a relatively high water table.*
- *To the rear of the church is a two-storey painted brick building, the Church Hall, built in 1886 to accommodate 400 students and to replace the earlier school associated with the 1863 chapel. To each side of the church is a path approximately 1.5m wide leading to the church hall, which extends to the northern and southern property boundaries.*

John Holland's management approach to avoid impact to this heritage building is to limit settlement through adopting appropriate design and construction methodologies as required by CoA E58. The Construction Groundwater Management Plan (Section 6 and Section 8) includes details on how settlement will be managed to prevent impacts during construction. The ECM includes the construction management requirements that relate to settlement.

Monitoring of impacts includes completing a building condition survey prior to the commencement of Construction as required by CoA E59. A condition survey will be completed following construction as required by CoA E60. A comparison of the two records will determine if any impact has occurred and if rectification works are required.

During construction, John Holland will monitor the Church for potential effects as a result of generating vibration, refer to the Construction Noise and Vibration Management Plan. Where required mitigation measures within the worksite maybe be installed in the event that impacts are observed. These measures will be installed from the worksite and not require any direct impact on the curtilage of the Church which is in keeping with the requirements of CoA E58.

The boundary of the construction worksite will be fenced to prevent construction personnel entering the Congregational Church grounds, unless authorised to do so.

The Environmental Control Map (ECM) will document the location of heritage buildings and monitoring equipment.

6.2 Salvage

In accordance with Conditions E15 and E16, salvage of architectural and decorative elements and furnishings from buildings to be demolished provides an opportunity for making available elements for re-use in buildings of the same era and architectural style or relevant interpretive displays. The scope of the Waterloo ISD works does not currently include demolition of heritage-listed buildings and as such, salvage of architectural elements or items is not included in the current scope of works.

In the event of an unexpected find, salvage of items will be undertaken in accordance with advice from the Heritage specialist.

6.3 General Measures

This Section describes the overall approach and principles associated with managing and mitigating risks across Aboriginal and non-Aboriginal heritage during Construction. It is noted that John Holland must not destroy, modify or otherwise physically affect any Heritage item not identified in documents referred to in Project Planning Approval Condition A1.

6.3.1 Competence, Training and Awareness

Prior to the start of work on-site staff will be given a site specific induction including the heritage requirements for the site. Regular toolbox talks will be presented when site conditions change and/or new staff join the team. Each induction/toolbox will include:

- Understanding the Unexpected Finds Protocol and the requirements of this plan
- Repercussions of any breaches to the procedures detailed in this plan
- Maps showing location of any known archaeological potential and anticipated archaeological features
- Photographs of the types of anticipated archaeological features

6.3.2 Site Establishment

Prior to the commencement of Construction the following will be installed or reviewed, if included as part of the handover from the TSE Contractor, to ensure appropriate for the Waterloo ISD work.

- Appropriate hoarding, protection, barriers, exclusion zones
- Signs on all protection works should be marked. The protection works should be inspected on a bi-monthly basis during the environmental and sustainability inspection process.

6.3.3 Structural Monitoring/Vibration Monitoring

To ensure heritage buildings are sufficiently protected during the Waterloo ISD work structural and vibration monitoring maybe required in accordance with the Construction Noise and

Vibration Management Plan (CNVMP) as vibration from construction work has the potential to impact on the fabric of heritage items. Specific details of the management requirements for the Congregational Church are provided in CNVMP Section 6.1. Where activities may result in impacts to the other known heritage buildings outside the construction footprint, a review of the construction activities will be undertaken by the environmental team to determine the appropriate monitoring. Input from the heritage specialist and vibration consultant may be required. The location of monitoring equipment will be documented on the ECM.

7 Unexpected Heritage Finds

Sydney Metro have prepared an Unexpected Heritage Finds Procedure (refer Appendix C) to provide a method for managing unexpected heritage items (both Aboriginal and non-Aboriginal) that are discovered during preconstruction (pre-Construction Heritage Manage Plan approval) and construction phases (post Construction Heritage Manage Plan approval). The Procedure meets the requirements of the Project Planning Approval Condition E19 and E25 and is provided in Appendix C.

As required by Project Planning Approval Condition E20, in the event that a potential relic/s is/are discovered, relevant construction will cease in the affected area and an Excavation Director notified to assess the significance level of the find/s. The Excavation Director will provide mitigation advice according to the significance level and the impact proposed. Based on the find and advice from the Excavation Director, an Archaeological Relics Management Plan (ARMP) will be produced in the event unexpected relics of State significance are discovered during construction. The ARMP will be prepared in consultation with the Heritage Council of NSW (or its delegate) to outline measures to be implemented to avoid and/or minimise harm to and/or salvage the relic of State significance. Construction in the vicinity of the discovery will not recommence until the requirements of the ARMP have been implemented, in consultation with the Excavation Director.

Sydney Metro will notify the Secretary in accordance with Condition E20 in the event of any relic of State significance being identified and also detail the outcome of consultation on the ARMP with the Heritage Council of NSW. John Holland will notify the Heritage Council of NSW (or its delegate) of any relic of State significance.

7.1 Unexpected Finds Procedure

The Project Planning Approval defines an 'Unexpected heritage find' as:

A potential heritage item discovered unexpectedly (usually during construction) but not identified in the EIS or PIR, or Archaeological Method Statements prepared under Condition E17 or E24 where assessment is required to determine if the item is a relic, or is an Aboriginal object. Unexpected heritage finds does not include human remains.

If unexpected finds (Aboriginal or non-Aboriginal), archaeological features or unidentified Aboriginal objects are exposed, work will stop in the affected area and the Sydney Metro Unexpected Heritage Finds Procedure (SM-18-00105232) implemented.

Human remains are not expected to be unearthed in delivering the Waterloo ISD Works. As such, in accordance with the note for Project Planning Approval Condition E27, it is highly likely that any human remains uncovered as part of the work would be under the jurisdiction of the NSW State Coroner and must be reported to NSW Police immediately. If any human remains are located NSW Police will be immediately notified. If required, Sydney Metro's Exhumation Management Plan, which incorporates the Exhumation Policy and Guideline referred to in REMM NAH3, will be implemented.

8 Heritage Interpretation and Reporting

8.1 Photographic and Archival Recording

In accordance with Project Planning Approval Condition E13, Sydney Metro will produce a Heritage Archival Recording Report, within two years of the completion of archival recordings.

Archival recording will be undertaken by a suitably qualified heritage specialist and prepared in accordance with NSW Heritage Office's "How to Prepare Archival Records of Heritage items (1998) and Photographic Recording of Heritage items Using Film or Digital Capture (2006) and will include directly impacted parts of the Congregational Church at Waterloo.

Where Aboriginal or non-Aboriginal heritage is identified during the Waterloo ISD works, details will be provided to Sydney Metro for reporting purposes.

In addition to the archival recording as required by Project Planning Approval Condition E13, Sydney Metro has completed external photography of all buildings and structures prior to demolition by others as required by Project Planning Approval Condition E14.

8.2 Archaeological Method Statements

In accordance with Project Planning Approval Condition E17, an Archaeological Method Statement (AMS) will be produced in consultation with the Heritage Council (or its delegate) where excavation works are likely to have an impact on the potential heritage items. Currently all planned excavations are within previously cleared areas or within the existing road/utility network which will not require an AMS.

Should excavation be required to the west of the station box, refer Figure 2 (yellow shading) an AMS would be required prior to excavation commencing.

If required, the AMS would be prepared prior to archaeological investigations for each site in consultation with the Heritage Council (or its delegate).

The Statements would include:

- An appropriate site specific strategy for managing the archaeological resources and artefacts at each site, in accordance with the likely significance, integrity and research potential.
- Additional historical research to remove risk associated with inadequate historical research to date and assist with understanding the nature of the archaeology to be found on the site.
- Research questions to guide the archaeological methodology
- An appropriate methodology that provides for a detailed analysis of any heritage items discovered during the investigations, including a sieving strategy (if applicable).

Detailed management strategy for potential archaeological remains and relics based on significance and integrity of exposed archaeological resources to ensure that all potential archaeological features, structures, deposits and relics that are exposed during archaeological investigations will be managed appropriately. This may include:

- Archaeological testing and monitoring strategy
- Open-area salvage excavation methodology in accordance with Heritage Council guidelines

Historical archaeological test and salvage excavations will be undertaken where significant physical remains of early occupation have been identified in the Archaeological Method Statement.

8.3 Reporting

8.3.1 Historical Archaeological Excavation Report

Where an Excavation permit has been issued by the Heritage Council (or where archaeological excavations have been carried out under another approval) a Historical Archaeological Excavation Report will be prepared. This report will include the following:

- Site historical research
- Detailed information on the excavation, including the aim, the context for the excavation, procedures, treatment of artefacts (cleaning, conserving, sorting, cataloguing, labelling, scale photographs and/or drawings, location of repository) and analysis of the information retrieved;
- Nominated repository for the items;
- A reassessment of the site's heritage significance

Each report will be submitted to Sydney Metro, and the Heritage Council within two years following completion of all archaeological investigations for the Project, in its entirety.

8.3.2 Artefact storage

A repository for artefacts recovered during archaeological investigations will be provided by Sydney Metro. If artefacts are encountered during Waterloo ISD construction activities, the artefacts will be cleaned, bagged, tagged and boxed ready for analysis by the Waterloo Heritage consultant. Artefacts will be labelled in accordance with the archaeological context. Should any significant heritage items be encountered during the works, a suitable long term repository will be agreed with Sydney Metro.

8.4 Heritage Interpretation Plan

A Heritage Interpretation Plan has been prepared by Sydney Metro to identify the key Aboriginal and Non-Aboriginal heritage values and stories of heritage items and heritage conservation areas affected by the CSSI. The Heritage Interpretation Plan must inform the Station Design and Precinct Plan referred to in Condition E101. The Heritage Interpretation Plan has been prepared in accordance with the NSW Heritage Manual, the NSW Heritage Office's Interpreting Heritage Places and Items: Guidelines (August 2005), and the NSW Heritage Council's Heritage Interpretation Policy and includes, but is not limited to:

- (a) a discussion of key interpretive themes, stories and messages proposed to interpret the history and significance of the affected heritage items and sections of heritage conservation

areas including, but not limited to the Sydney Terminal and Central Railway Station Group, and Martin Place Station, Sydenham Station and Sydenham Pit and Drainage Pumping Station Precincts;

(b) Identification and confirmation of interpretive initiatives implemented to mitigate impacts to archaeological Relics, heritage items and conservation areas affected by the CSSI including;

i. use of interpretative hoardings during construction

ii. community open days

iii. community updates

iv. station and precinct design; and

(c) Aboriginal cultural and heritage values of the project area including the results of any archaeological investigations undertaken.

The Heritage Interpretation Plan has been prepared in consultation with the Heritage Council of NSW (or its delegate), Relevant Councils and Registered Aboriginal Parties, and must be submitted to the Secretary before commencement of Construction.

The Sydney Metro Heritage Interpretation Plan Section 4.3 outlines the process for the preparation of a site specific Heritage Interpretation Plan. Section 5 outlines the site specific scope. The requirements for the Waterloo ISD are outlined in Section 5.11 and include the following :

- *Impact*
 - Minor/temporary effect on local heritage items. Depending on the degree of disturbance (which is presently unknown) there is moderate to high potential for Aboriginal objects that could inform interpretation.
- *Interpretation response*
 - Themes that could be explored:
 - Development of the City
 - Industry.

The Heritage Interpretation Plan for the Waterloo ISD will be developed throughout the design process. The plan will identify and address an audience for the interpretation and will include research, identification of historic themes and heritage values, identification of potential options for interpretation, preliminary consideration for the location and type of interpretive media and consultation with stakeholders who would need to agree to the strategy to facilitate development of the Heritage Interpretation Plan. It is therefore proposed that interpretation be developed in a staged manner. This approach is complementary to the design process, which is ongoing, and allows for heritage interpretation to be incorporated in the design in accordance with the Heritage Division and Heritage Council guidelines referred to above.

9 Auditing and Inspections

9.1 Auditing

Auditing will be completed in accordance with Section 7 of the CEMP.

9.2 Inspections

The Environment and Sustainability Team will undertake weekly inspections and monitoring of construction activities to ensure compliance with the requirements of the Project Planning Approval Conditions and this plan. Items that require action will be documented on the site environmental inspection form. The Site Construction Manager will be responsible for providing appropriate resources in terms of labour, plant and equipment to enable the items to be rectified in the nominated timeframes.

Daily inspections of controls will be made by Supervisors and maintenance will be undertaken during active site works.

Compliance records would be maintained on the project database and include:

- Inspections undertaken in relation to heritage management measures;
- Archival recordings undertaken of any heritage item;
- Unexpected heritage finds
- Records of any impacts avoided or minimised through design or construction method
- Vibration monitoring data
- All plans, strategies and reports required under the project planning approval.

The above records will be made available to Sydney Metro.

10 Review and Improvement

The aspects and impacts will be reviewed in accordance with Section 6.2 of the CEMP. This includes reviewing risks based on the construction activity and implementing appropriate management measures as outlined in Section 6 of this plan.

This Plan will be reviewed at least annually. John Holland will undertake the ongoing development, amendment and updating of this Plan to ensure it remains consistent with Project priorities, risk management, client requirements and Project objectives, taking into account:

- The status and progress of Waterloo ISD activities
- Changes in the design, delivery and operations processes and conditions
- Lessons learnt during delivery and operations
- Changes in other related Project plans
- Requirements and matters not covered by the existing Project Plans
- Changes to Project Plans as directed by TfNSW's Representative under the Deed.
- Where deemed appropriate in relation to items raised within inspections or audits.

A copy of the updated plan and changes will be distributed to all relevant stakeholders in accordance with the approved document control procedure.

11 Enquires, Complaints and Incident Management

Environmental incidents and complaints are to be investigated, documented, actioned and closed out as per the details provided in the Community Consultation Strategy and the CEMP, including those related to Aboriginal and non-Aboriginal cultural heritage.

Appendix A– Compliance Matrix

Clause	Detail	Reference
Construction Environmental Management Framework		
10.1 a	<p>The following heritage management objectives will apply to construction:</p> <ul style="list-style-type: none"> a) Embed significant heritage values through any architectural design, education or physical interpretation; b) Minimise impacts on items or places of heritage value; c) Avoid accidental impacts on heritage items; and d) Maximise worker’s awareness of Aboriginal and non-Aboriginal (historic) heritage. 	<p>Section 8 Section 6</p>
10.2 a	<p>Principal Contractors will develop and implement a Heritage Management Plan which will include as a minimum:</p> <ul style="list-style-type: none"> i) Evidence of consultation with Registered Aboriginal Parties and the NSW Heritage Council; ii) Identify initiatives that will be implemented for the enhancement of heritage values and minimisation of heritage impacts, including procedures and processes that will be used to implement and document heritage management initiatives; iii) The heritage mitigation measures as detailed in the environmental approval documentation; iv) The responsibilities of key project personnel with respect to the implementation of the plan; v) Procedures for interpretation of heritage values uncovered through salvage or excavation during detailed design; vi) Procedures for undertaking salvage or excavation of heritage relics or sites (where relevant), consistent with and any recordings of heritage relics prior to works commencing that would affect them; vii) Details for the short and/or long term management of artefacts or movable heritage; viii) Details of management measures to be implemented to prevent and minimise impacts on heritage items (including further heritage investigations, archival recordings and/or measures to protect unaffected sites during construction works in the vicinity); ix) Procedures for unexpected heritage finds, including procedures for dealing with human remains x) Heritage monitoring requirements ; and xi) Compliance record generation and management 	<p>Section 1.5 Section 6 Section 8 Section 6 Section 4 Section 8 Section 6.2 Section 8.3 Section 6 Section 7 Appendix C Section 6 Section 9</p>
10.2 b	<p>The Contractor’s regular inspections will include checking of heritage mitigation measures.</p>	<p>Section 9</p>

Clause	Detail	Reference	
10.2 c	Compliance records will be retained by the Contractor. These will include:	Section 9.2	
	i) Inspections undertaken in relation to heritage management measures;		
	ii) Archival recordings undertaken of any heritage item		
	iii) Unexpected heritage finds and stop work orders; and		
	iv) Records of any impacts avoided or minimised through design or construction methods		
10.3	Examples of heritage mitigation measures include:	Section 6.3	
	i. Any heritage item not affected by the works will be retained and protected throughout construction;		
	ii. During construction undertake professional archaeological investigation, excavation, and reporting of any historical Indigenous heritage sites of state significance which will be affected. Reporting may be completed as construction progresses;	Section 8	
	iii. Undertake archival recordings of all non-Indigenous heritage items affected by the works prior to commencement of works; and	Section 8.1	
	iv. Implement unexpected heritage find procedures for Indigenous and non-Indigenous heritage items.	Section 7.1	
Project Planning Approval Conditions			
C3	The following CEMP sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP sub-plan and be consistent with the CEMF and CEMP referred to in Condition C1.		Section 1.5
	Required CEMP sub-plan	Relevant government agencies to be consulted for each CEMP sub-plan	
	(a) Noise and vibration	Relevant Council(s)	
	(b) Biodiversity	OEH and Relevant Council(s)	
	(c) Air quality	N/A	
	(d) Soil and Water	DPI Water, Relevant Council(s), OEH, SES, NSW Fire and Rescue	
	(e) Groundwater	DPI Water	
	(f) Blasting	N/A	
	(g) Heritage	Heritage Council (or its delegate) and Relevant Council(s)	
(h) Construction Traffic	Relevant Road Authorities, RMS, Sydney Coordination Office		
C4	The CEMP sub-plans must state how: (a) the environmental performance outcomes identified in the EIS as amended by the documents listed in A1 will be achieved; (b) the mitigation measures identified in the EIS as amended by documents listed in A1 will be implemented;		The Plan

Clause	Detail	Reference
	(c) the relevant terms of this approval will be complied with; and (d) issues requiring management during construction, as identified through ongoing environmental risk analysis, will be managed.	
C5	The CEMP sub-plans must be developed in consultation with relevant government agencies. Where an agency(ies) request(s) is not included, the Proponent must provide the Secretary justification as to why. Details of all information requested by an agency to be included in a CEMP sub-plan as a result of consultation and copies of all correspondence from those agencies, must be provided with the relevant CEMP sub-plan.	Section 1.5 Appendix B
C8	Construction must not commence until the CEMP and all CEMP sub-plans have been approved by the Secretary. The CEMP and CEMP sub-plans, as approved by the Secretary, including any minor amendments approved by the ER (or AA in regards to the Noise and Vibration sub-plan), must be implemented for the duration of construction. Where the CSSI is being staged, construction of that stage is not to commence until the relevant CEMP and sub-plans have been approved by the Secretary.	Section 1.7
E10	The Proponent must not destroy, modify or otherwise physically affect any Heritage item not identified in documents referred to in Condition A1.	Section 6.3
E13	The Proponent must prepare a Heritage Archival Recording Report, including photographic recording of the heritage items identified in documents referred to in Condition A1	Section 8.1
E17	The Archaeological Assessment Research Design Report (AARD) in the PIR must be implemented. Final Archaeological Method Statements must be prepared in consultation with the Heritage Council of NSW (or its delegate) before commencement of archaeological excavation works.	Section 8.0
E18	Before excavation of archaeological management sites, the Proponent must nominate a suitable qualified Excavation Director who complies with the Heritage Council of NSW's Criteria for Assessment of Excavation Directors (July 2011) to oversee and advise on matters associated with historic archaeology and advise the Department and OEH. Where archaeological excavation is required, the Excavation Director must be present to oversee excavation and advise on archaeological issues. The Excavation Director must be given the authority to advise on the duration and extent of oversight required as informed by the provisions of the approved AARD and Excavation Methodology. A final archaeological report must be submitted to the Heritage Council of NSW within two (2) years of the completion of archaeological excavation on the project. The report must include information on the entire historical archaeological program relating to the CSSI.	Section 4
E19	An Unexpected Heritage Finds Procedure must be prepared: (a) To manage unexpected heritage finds in accordance with any guidelines and standards prepared by the Heritage Council of NSW or OEH; and	Section 7.1 and Appendix B

Clause	Detail	Reference
	<p>(b) By a suitably qualified and experienced heritage specialist</p> <p>The procedure must be included in the AARD and must be implemented for the life of the project.</p>	
E20	<p>In the event that a potential relic/s is/are discovered, relevant construction must cease in the affected area and the Excavation Director must be notified and assess the significance level of the find/s and provide mitigation advice according to the significance level and the impact proposed. The Excavation Director must attend the site in accordance with E18 to oversee the excavation where relics of State significance are found.</p> <p>The Secretary must be notified at the same time as the Heritage Council of NSW (or its delegate) of any relic of State significance found.</p> <p>An Archaeological Relic Management Plan specific to the relic of State Significance must be prepared in consultation with the Heritage Council of NSW (or its delegate) to outline measures to be implemented to avoid and/or minimise harm to and/or salvage the relic of State significance.</p> <p>Construction in the vicinity of the discovery must not recommence until the requirements of the ARMP have been implemented, in consultation with the Excavation Director. The Proponent must notify the Secretary in writing of the outcome of consultation on the Archaeological Relic Management Plan with the Heritage Council of NSW.</p>	Section 4 and Section 7
E21	<p>The Proponent must prepare a Heritage Interpretation Plan which identifies and interprets the key Aboriginal and Non-Aboriginal heritage values and stories of heritage items and heritage conservation areas impacted by the CSSI. The Heritage Interpretation Plan must inform the Station Design and Precinct Plan referred to in Condition E101. The Heritage Interpretation Plan must be prepared in accordance with the NSW Heritage Manual, the NSW Heritage Office's Interpreting Heritage Places and Items: Guidelines (August 2005), and the NSW Heritage Council's Heritage Interpretation Policy and include, but not be limited to:</p> <ul style="list-style-type: none"> a. a discussion of key interpretive themes, stories and messages proposed to interpret the history and significance of the affected heritage items and sections of heritage conservation areas including, but not limited to the Central Station and Martin Place Station Precincts; b. identification and confirmation of interpretive initiatives implemented to mitigate impacts to archaeological Relics, heritage items and conservation areas affected by the CSSI including; <ul style="list-style-type: none"> i. use of interpretive hoardings during construction i. community open days i. community updates v. station and precinct design; and c. Aboriginal cultural and heritage values of the project area including the results of any archaeological investigations undertaken. 	Section 8.4

Clause	Detail	Reference
	The Heritage Interpretation Plan must be prepared in consultation with the Heritage Council of NSW (or its delegate), Relevant Councils and Registered Aboriginal Parties, and must be submitted to the Secretary before commencement of construction.	
E23	The Proponent must take all reasonable steps so as not to harm, modify or otherwise impact any Aboriginal object associated with the CSSI except as authorised by this approval.	Section 6.0
E24	Before excavation, the Proponent must implement the Aboriginal Cultural Heritage Assessment prepared for the CSSI and included in the PIR. Excavation and/or salvage must be undertaken by a qualified archaeologist in consultation with the Registered Aboriginal Parties for the CSSI.	Section 5.2
E25	Where previously unidentified Aboriginal objects are discovered during construction of the CSSI, construction must stop in the vicinity of the affected area and a suitable qualified and experienced Aboriginal heritage expert must be contacted to provide specialist heritage advice, before works recommence. The measures to consider and manage this process must be specified in the Heritage Management sub-plan required by Condition C3 and, where relevant, include registration in the OEH's Aboriginal Heritage Information Management System (AHIMS)	Section 7.1
E26	This approval does not allow the Proponent to harm, modify, or otherwise impact human remains uncovered during the construction and operation of the CSSI, except in accordance with the Exhumation Management Plan	Section 7.1
Revised Environmental Management Measures		
NAH1	Archival recording and reporting of the following heritage items would be carried out in accordance with the NSW Heritage Office's How to Prepare Archival Records of Heritage Items, and Photographic Recording of Heritage Items Using Film or Digital Capture	Section 8.1
NAH2	The archaeological research design would be implemented. Significant archaeological findings would be considered for inclusion in heritage interpretation (as per NAH8) for the project and be developed in consultation with the relevant local council.	Section 8.2
NAH3	An Exhumation Policy and Guideline would be prepared and implemented. It would be developed in accordance with the Guidelines for Management of Human Skeletal Remains (NSW Heritage Office, 1998b) and NSW Health Policy Directive - Exhumation of human remains (December, 2013). It would be prepared in consultation with NSW Heritage Office and NSW Health.	Section 7
NAH4	The method for demolition of existing buildings and or structures at CDS, VC, MPS, PSS, CS and Waterloo Station would be developed to minimise direct and indirect impacts to adjacent and/or adjoining heritage items.	Section 6
NAH7	The project design would be sympathetic to heritage items and, where reasonable and feasible minimise impacts to the setting of heritage items. The detailed design for MPS and CS would be developed with the input from a heritage architect	Section 8.4

Clause	Detail	Reference
NAH8	Appropriate heritage interpretation would be incorporated into the design for the project in accordance with the NSW Heritage Manual, the NSW Heritage Office's Interpreting Heritage Places and Items: Guidelines, and the NSW Heritage Council's Heritage Interpretation Policy.	Section 8.4
NAH19	Subject to outcomes of consultation with the church, temporary and permanent works at the Congregational Church would: <ul style="list-style-type: none"> • Minimise impacts to heritage fabric Be sympathetic to the heritage values and architectural form of the building.	Section 6.1
AH1	Aboriginal stakeholder consultation would be carried out in accordance with the NSW Office of Environment and Heritage's Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010.	Section 52
AH2	The cultural heritage assessment report would be implemented.	Section 5.2
AH3	Archaeological test excavation (and salvage when required) would be carried out where intact natural soil profiles with the potential to contain significant archaeological deposits are encountered at the Blues Point temporary site, Barangaroo Station, Martin Place Station, Pitt Street Station, Central Station, Waterloo Station and Marrickville dive site. Excavations would be conducted in accordance with the methodology outlined in the Aboriginal cultural heritage assessment report.	Section 5.2
AH4	Appropriate Aboriginal heritage interpretation would be incorporated into the design for the project in consultation with Aboriginal stakeholders.	Section 8.4

Appendix B Stakeholder consultation

The Project Planning Approval requires the CHMP be prepared in consultation with government agencies. Table B1 outlines the requirement and the outcome of the consultation.

Table B1 Consultation requirements

Condition	Document	Agency	Comment	Response
C3	CHMP	City of Sydney	<p>The City agrees with the Plan that the most impact, physical and visual, is likely to be on the Church building due to its proximity to the construction zone whereas the impacts on the other two heritage items are more likely to be visual. The City concurs that the visual impacts will be minor due to the distance between the site and the items.</p> <p>Due to the proximity of the church, it is proposed to undertake a 'before and after' building condition survey for the Church to later compare and determine if any impact has occurred and whether any rectification is required. This is considered essential given the scale and duration of the proposed building works.</p> <p>The City requests that a copy of the 'before and after' Church building condition survey be provided to us for our records. We also recommend that the heritage interpretation plan be devised in collaboration with the developers of the buildings/sites to the west of the station which we understand are all in their own design stages.</p> <p>It is essential that the heritage interpretation of the site takes a holistic rather than a piecemeal approach due to the various stages of development and the different designers and architects involved.</p> <p>Overall, the City is satisfied that the submitted heritage management plan includes all the necessary measures to avoid, mitigate and/or remedy the construction impacts on the heritage items.</p>	<p>A building condition survey required by CoA E59 will be offered to the owner of the Church, if the offer is accepted, the survey will be completed prior to the commencement of construction. If agreed by the owner a copy of the report will be provided to the City of Sydney.</p> <p>A follow up survey will be completed in accordance with CoA E60.</p>
C3	CHMP	Heritage Council (or delegate)	No response received	
C3	CHMP	OEH (Aboriginal)	Please be advised that EES will not be providing comments.	no action required

Appendix C

Sydney Metro Unexpected Heritage Finds Procedure