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Ms Naomi Moss
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Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Via Email to: naomi.moss@planning.nsw.gov.au

Dear Ms Moss

WestConnex M4-M5 Link (SSI 7485) – Comments on Environmental Impact Assessment

Thank you for inviting the Heritage Council of NSW (Heritage Council) to provide comment and recommended conditions of approval for the WestConnex M4-M5 Link project. I am responding as the delegate of the Heritage Council.

It is understood that the project comprises a new multi-lane tunnel road link between the M4 East Motorway at Haberfield and the New M5 Motorway at St Peters. It includes an interchange at Lilyfield and Rozelle (the Rozelle interchange), and a tunnel connection between Anzac Bridge and Victoria Road, east of Iron Cove Bridge (the Iron Cove Link).

A review of the documentation associated with the project has been undertaken, in particular:

- Environmental Impact Statement, Volume 1A-1C;
- Appendix U 'Technical Working paper: Non-Aboriginal Heritage'.

Based upon this review, the following comments are provided.

It is noted that there are six main works areas along the project corridor. Impacts vary within each area however they include the complete or partial demolition of four local heritage items. In addition, there are nine potential local heritage items which will be demolished – primarily adjacent to Iron Cove Bridge on Victoria Road, and the partial demolition of one landscape feature assessed as being of potential heritage significance. A number of local heritage items will also be impacted by the project including through visual, vibration or settlement impacts.

Area 1 - Haberfield/ Ashfield

Two additional construction ancillary facilities have been identified as part of the works, Parramatta Road East civil and tunnel site (between Alt Street and Bland Street), and Parramatta Road West civil and tunnel site (between Alt Street and Bland Street). Both sites are proposed to be used for tunnelling support during construction and would require the demolition of several commercial properties for construction.

It is unclear why these additional construction areas are required considering there are already existing cleared construction sites available. It is considered that the cumulative impact of expansion of the construction footprint will have a negative effect on the Haberfield

Conservation Area and the area more generally. The construction area must be limited to the existing Northcote Street civil site only.

Area 2 – Leichhardt

Works within this area are proposed to occur adjacent to Section 170 item Charles Street Underbridge. Whilst it is considered there would be no physical impacts as proposed works are located away from the bridge, there may be some indirect setting and vibration impacts as a result of the adjacent site being demolished and used for tunnelling.

There may also be visual impacts to Charles Street Underbridge with the construction of the Motorway Operations Complex (MOC). The MOC should be positioned on the site to ensure views and vistas to the Charles Street Underbridge are not obscured. Further, monitoring must be undertaken during demolition and tunnelling to ensure the bridge is not structurally impacted.

Area 3 - Rozelle, Lilyfield and Annandale interchange

Part of the Rail Yards are to be developed into a recreational area and wetlands. The Rozelle Rail Yards have a strong association with White Bay Power Station, as it was built to supply power to the rail network in the region. The rail corridor is recognised as a key component of the historic industrial, transport and maritime landscape of the area.

It is understood the removal of the Darling Harbour Goods line tracks within Rozelle Rail Yards has already taken place. These tracks were the last sections of the line in situ. It is unclear where these tracks have been stored. Consideration must be given to returning these tracks to the site for reinstatement or reuse. This was principally an industrial type landscape and this needs to be considered and addressed in terms of any proposed new landscape/beautification scheme. The former use of the railyards and their contribution to NSW industry needs to be delivered as part of any interpretation scheme for the wider area.

The construction of a temporary bridge across Victoria Rd will encroach into the south western curtilage of the SHR listed White Bay Power Station. Whilst this work will be located some distance from the power station building, it will occur close to the southern penstock in the north-eastern part of the site. This element, which fed water to the Power Station, is outside the SHR curtilage, however it is considered highly significant. Proposed works are noted as being restricted to three metres of this item. However it is considered this exclusion zone must be expanded to ten metres to avoid potential adverse heritage impacts.

The works also involve the demolition of three items listed as being of local significance on the SREP 26 Heritage Register along Lilyfield Rd. Two of these items, late nineteenth century Cadden Le Messurier, and 1878 Former Hotel are on the edge of the of the project footprint. The need to demolish these buildings is unclear as they are some distance from the construction zone. It is therefore recommended that the project footprint is realigned to exclude these properties from the works area.

Works also include the permanent construction of two Motorway Operations Complexes (MOC) including the construction of 3 x 35m high ventilation stacks. It is understood the final design of these elements has not yet commenced. However, due to their proposed height and scale, they will potentially be visually intrusive. The design of these ventilation facilities must be sympathetic to the surrounding character and setting, including the Hornsey Street, Easton Park and Brenan Estate Conservation Areas. The design must also ensure views to the SHR listed White Bay Power Station are not impacted.

Area 4 - Iron Cove Link

As part of works within this area, six buildings identified as being of potential local heritage significance are proposed to be demolished. Their demolition is not supported, as it would

diminish the character of the area. However, if demolition is approved, historic fabric and features must be salvaged for distribution back to the former landowners and the local community.

Works also include the construction of the Iron Cove Motorway Operations Complex, and a 20m high ventilation stack. Whilst the design of this element has not been finalised, its proposed placement will be visually intrusive. The design and placement of this element must give consideration to the surrounding character and setting including the adjacent Iron Cove Conservation area.

Area 5 - Annandale (Pymont bridge road and Parramatta road)

11 properties are proposed to be demolished as part temporary works within this area, including an item identified as being of potential local heritage significance, the former Bank of NSW. This Inter-War commercial building was purpose built and is rare in the context of Parramatta Road. It is recommended that the layout of the construction area be revised to exclude this building from the construction site. Further, consideration must be given to retaining the storage warehouse along Pymont Bridge Road to ensure impact to the character of the streetscape is minimised.

General Comments

It is noted that detail of the design and construction approach presented in the EIS is indicative only and will be subject to further detailed design and construction planning. The Heritage Council advises of the need for further consideration of heritage impacts during the detailed design of this project, including ongoing input from heritage specialists and the Heritage Division.

In addition, associated motorway infrastructure, such as electronic toll gantries, traffic lights, signage etc are still to be developed. These have the potential to have visual impacts on the setting of heritage items and the character of the Heritage Conservation areas within the project corridor. Input from heritage specialists and the Heritage Division should be sought during any further design development so that any potential impacts can be minimised.

Recommended Conditions

If approved, the following conditions are recommended.

- A suitably qualified heritage architect and heritage landscape architect must be integrally involved in the detailed design development for all the proposed project's components.
- The construction ancillary facilities sites proposed within the Haberfield interchange area should be limited to the existing Northcote Street civil site only. The expansion of the construction footprint to include the Parramatta Road East and West civil and tunnel sites will adversely impact on the setting of the area, as any further demolition will add to the already significant degradation of this area.
- MOC1 must be positioned on the Darley Street site with consideration of views and vistas to the Charles Street Underbridge with the express aim to creating a visual separation between the new structures and the heritage item.
- Monitoring of the impacts of vibration to the Charles Street Underbridge and Iron Cove Bridge must be implemented during construction to ensure they are not structurally impacted by the works.
- The design of the ventilation facilities at MOC3 must give consideration to the surrounding character and setting, and ensure views to the SHR listed White Bay

Power Station are not impacted. Opportunities to reduce bulk and scale must be explored by the proponent.

- The urban landscape transformation of the former Rozelle Rail Yards must acknowledge its former industrial character and setting, and appropriate interpretation strategies must be put in place to present its former historic industrial, transport and maritime use.
- The proposed works exclusion zone around the southern penstock adjacent to the White Bay Power Station, must be increased to ten metres to avoid any potential adverse heritage impacts to the southern penstock
- The demolition of Cadden Le Messurier and Former Hotel at Lilyfield is not supported. The construction footprint must be modified to exclude the properties Cadden Le Messurier, 84 Lilyfield Road and Former Hotel, 78 Lilyfield Road from the construction zone.
- Photographic archival recording must be carried out for listed heritage items and sites of potential heritage significance affected by the proposed works prior to the commencement of any works. Historic fabric and features must also be salvaged for distribution back to the former landowners and the local community.
- Properties adjacent to, or in the vicinity of items proposed to be demolished along Victoria Road, must be protected during the demolition works.
- The design and placement of the proposed ventilation element in the widened Victoria Road carriageway must give consideration to the surrounding character and setting of the area, including to the adjacent Iron Cove Conservation area. Opportunities to reduce bulk and scale must be explored by the proponent.
- The demolition of the Former Bank of NSW is not supported. The proponent must explore alternative design solutions to retain the Former Bank of NSW building along Parramatta Road, Annandale. This building is rare in the context of Parramatta Road and should be excluded from the construction site.
- The proponent must explore alternative design solutions to retain 79 Pyrmont Bridge Road, Annandale to ensure the character of the streetscape is not further impacted.
- The proponent must give consideration to reducing the bulk and visual impact of the ventilation towers at St Peters interchange to ensure it does not adversely impact the surrounding area.

Archaeology

- Further archaeological investigation should be undertaken to better inform significance and rarity of the archaeology on at HAMUs 3, 5, 6, 9, 10 and 11. Based on these investigations archaeological testing should be undertaken prior to works to confirm where the archaeology may survive within the site and the degree to which it survives.
- All affected historical archaeological 'relics' and/or deposits of Local significance are to be subject to professional archaeological excavation and/or recording before construction works commence which will impact those 'relics'. A Research Design including an Archaeological Excavation Methodology must be prepared in accordance with Heritage Council guidelines. Those documents should be prepared for the

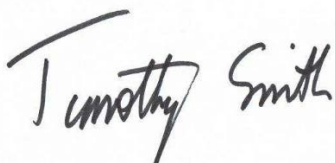
approval of the Director-General, Department of Planning & Infrastructure upon receipt of advice from the Heritage Division of the Office of Environment & Heritage.

- After any archaeological works have been undertaken, a copy of the final excavation report(s) shall be prepared and lodged with the Heritage Council of NSW, the City of Sydney and the Department of Planning & Infrastructure. The proponent shall also be required to nominate a repository for the relics salvaged from any historical archaeological excavations.
- The information within the final excavation report shall be required to include the following:
 - a/. An executive summary of the archaeological programme;
 - b/. Due credit to the client paying for the excavation, on the title page;
 - c/. An accurate site location and site plan (with scale and north arrow);
 - d/. Historical research, references, and bibliography;
 - e/. 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;
 - f/. Nominated repository for the items;
 - g/. Detailed response to research questions (at minimum those stated in the Department of Planning & Infrastructure approved Research Design);
 - h/. Conclusions from the archaeological programme. This information must include a reassessment of the site's heritage significance, statement(s) on how archaeological investigations at this site have contributed to the community's understanding of the Site and other Comparative Site Types and recommendations for the future management of the site;
 - i/. Details of how information about the excavations has been publicly disseminated (for example, include copies of press releases, public brochures and information signs produced to explain the archaeological significance of the sites).
- Given the significance of the archaeology at White Bay Power Station (HAMU 7), the Heritage Council recommends that the proposed mitigation strategies outlined below are appropriate to guide the management of this State significant archaeology into the detailed design phase.
 1. Archaeological testing should be undertaken to confirm where the water channels associated with the southern penstock may survive within the site and the degree to which it survives.
 2. Areas of State significant archaeology and substantially intact archaeological evidence shall be avoided where feasible as part of the delivery of the project.
 3. Where State significant archaeology and substantially intact archaeological resources would be affected by the project the impacts should be mitigated through the following measures:
 - An Archaeological Research Design and Methodology to guide the approach to any archaeological excavation should be prepared by a suitably qualified and experienced excavation director who fulfils the Heritage Council's Excavation Director Criteria for the excavation of state significant archaeological sites must be prepared in accordance with Heritage Council guidelines. This document should be prepared for the approval of the Director-General of Planning & Infrastructure upon receipt of advice from the Heritage Division of the Office of Environment & Heritage.

- After any archaeological works have been undertaken, a copy of the final excavation report(s) shall be prepared and lodged with the Heritage Council of NSW and the Department of Planning & Infrastructure. The proponent shall also be required to nominate a repository for the relics salvaged from any historical archaeological excavations
- Preparation of final reporting shall be required to include the following:
 - a/. An executive summary of the archaeological programme;
 - b/. Due credit to the client paying for the excavation, on the title page;
 - c/. An accurate site location and site plan (with scale and north arrow);
 - d/. Historical research, references, and bibliography;
 - e/. 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;
 - f/. Nominated repository for the items;
 - g/. Detailed response to research questions (at minimum those stated in the Department of Planning & Infrastructure approved Research Design);
 - h/. Conclusions from the archaeological programme. This information must include a reassessment of the site's heritage significance, statement(s) on how archaeological investigations at this site have contributed to the community's understanding of the Site and other Comparative Site Types and recommendations for the future management of the site;
 - i/. Details of how this information about the excavations have been publicly disseminated (for example, include copies of press releases, public brochures and information signs produced to explain the archaeological significance of the sites).
- The Applicant must ensure that if unexpected archaeological deposits or relics not identified and considered in the supporting documents are discovered, work must cease in the affected area(s) and the Heritage Council of NSW must be notified. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery.
- Should any Aboriginal 'objects' be uncovered by the work, excavation or disturbance of the area is to stop immediately and the Office of Environment & Heritage is to be informed in accordance with Section 89A of the National Parks and Wildlife Act, 1974 (as amended). Works affecting Aboriginal 'objects' on the site must not continue until the Office of Environment and Heritage has been informed. Aboriginal 'objects' must be managed in accordance with the *National Parks and Wildlife Act 1974*.

Should you have any queries, please contact David Nix, Heritage Assets Officer at the Heritage Division on (02) 9895 6523 or at david.nix@environment.nsw.gov.au.

Yours sincerely



Tim Smith OAM

Director Heritage Operations

Heritage Division

Office of Environment and Heritage

As Delegate of the Heritage Council of NSW

16 October 2017